# BEFORE THE SERVICE TRIBUNALKHYBERPAKHTUNKHWA PESHAWAR SERVICE APPEAL No.7941/2021

Mr.: MEHAR UN NISA vs. EDUCATION DEPARTMENT INDEX

	₩.		1 (),,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	·
S# .		DOCUMENTS	ANNEXURE	PAGE
1		REPLY		1 AND 2
2		Ingwij Report	17/1"	3-4
3	-	Ope releting	'B"	5
4)		Crader	100	6-7
				-
	:			
<del></del>	<u> </u>	<u> </u>		
·····				
<del> </del>				
	<u>-</u>			
	<u></u> :	<u> </u>		
		<u> </u>		
<u> </u>	4 1			
	<u> </u>			
		<u> </u>		,
	ı			

District Education Officer (Female) Peshawar

### BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA **PESHAWAR**

Service appeal No. 7941/2021

Mst. MEHAR UN NISA .....Appellant

### SECTARY (E&SE) KHYBER PKHTUNKHWA PESHAWRA &OTHERS .....Respondents

# PARAWISE COMMENTS ON BEHALF OF RESPONDENT No.1, to 4.

#### Respectively Sheweth:

The Respondents submit below:

### PRELIMINARY OBJECTIONS:

- 1. That the Appellant has got no cause of action /locus standi to file the present
- 2. That the Appellant has concealed material facts from this Hon'ble Tribunal.
- 3. That the Appellant is estopped by her own conduct to file the instant appeal before this Hon'ble Tribunal.
- 4. That the instant Appeal is badly time barred.
- 5. That the instant Appeal is not maintainable in its present form.
- 6. That the instant Appeal is bad for mis- joinder and non- joinder of the necessary and proper parties.
- 7. That the Appellant has not come with clean hands to this Hon'ble Tribunal.
- 8. That the instant Appeal is barred by law.

### Reply on Facts:

- 1. That reply to Para No 1 it is submitted that the appellant was appointed on 21/03/2013 as CT teacher in BPS-09 on contract and non-pensionable basis w.e.f the date of taking over charge. .
- 2. That reply to Para No 2 is also pertains to record.
- 3. That reply to Para No 3. It is submitted that the appellant was wrongly promoted to S.CT on dated 07-12-2020 because she was junior from the other teachers, therefore her order withdrawn on dated 17-03-2021 which Annexed as Annexure "D" on page No-14 of the main appeal. Furthermore the respondents department conducted inquiry on a complaint against the said Promotion order on the recommendation of inquiry committee the DPC meeting held and the appellant promotion order withdrawn because the appellant was junior from other teacher (inquiry, DPC Minutes and withdrawn order are Annexed as Annexures A,B,&C)
- 4. That reply of Para No-04 has already been given in Para No-03
- 5. That Para No-05 is incorrect and misleading. There is no record of the appellantappeal in the respondent Department.
- 6. That reply to Para No-06.It is submitted that respondent No-05 was senior from the appellant. Therefore she promoted from CT to S.CT under the
- 7. That reply to Para No-07 pertains to record.
- 8. That the appellant has no cause of action to file the instant service appeal in this Hon'ble service Tribunal.

### REPLY TO GROUND

- A. That ground A is incorrect, misleading and against the facts the order dated 17-03-2021 is according to law and rules.
- B. That ground b is incorrect and misleading.
- C. That respondent also seeks permission from this Hon'ble service tribunal to advance other proof & grounds at the time of arguments.

It is therefore, very humbly prayed that on acceptance of this reply, the instant appeal may very kindly be dismissed with cost.

Aman 10/2

District Education Officer (Female) Peshawar

Elementary & Secondary, Education,
Pakhtunkhwa, Peshawar.

(SECRETARY)
Elementary & Secondary Education Khyber
Khyber Pakhtunkhwa, Peshawar.

### Affidavit

Stated on Oath the content of the reply is correct to the best of my knowledge and nothing has been concealed from this honorable service tribunal.

/District Education Officer (Female) Peshawar Annet A) P-3

# OFFICE OF THE PRINCIPAL GHS JANAKOR HSD PESHAWAR

No: 1832

Date: 11-01-2021

To

The District Education Officer

HSD Peshawar

Subject: SUBMISSION OF INQUIRY REPORT

# Introduction:

With reference to your letter No. 3644-45 dated 22/12/2020,

We, 1. Mr. Multan Khan Principal GHS Janakor HSD Peshawar

2. Mr. Usman Shah Principal GHS Sara Dargai HSD Peshawar

Have been appointed inquiry officers to investigate the complaints levelled by Ms. Saadia CT GGMS Mir Haider Killi HSD Peshawar and others against the Female CT Merit List.

# NATURE OF CHARGES:

Ms. Saadia CT GGMS Mir Halder Killi HSD Peshawar and others has filed an application Complaining/levelling charges against the CT Merit List and has appealed for reconsideration and Justification in it on merit basis.

# Procedure:

All the Requisite records including Service Books, appointment notification and other relevant Documents of all the CT Candidates included in the merit list were considered and checked well in all respect.

# FINDINGS:

We thoroughly probe into the matter and found the following observations:-\_

- 1. Appointment notification (Attached) of all the candidates was the same included in the merit list i.e from S.NO.1 to 9.
- 2. In application filed by Ms. Mehrunisa appealing for correction in the merit of appointment notification of 2013.
- 3. Minutes of the committee nominated for the correction /amendment in the appointment notification 2013 is attached herewith the report.
- 4. Keeping in view the merit formula (Criteria) on prescribed form filled by Saadia CT is attached here with the report.

# Conclusion:-

New merit list of CT Female for promotion from CT to Sr. CT has been rearranged, prepared and are submitted alongwith 1" appointment notifications in the honor of worthy District Education officer HSD Peshawar for further necessary action please.

Printipal

GHS Janakor HSD Peshawar

Principal

GHS Sara Dargal HSD Peshawar

WürkingsPäper

MOTION OF CT. (UPS-15) FEMALE TO THE POST OF SCHOOLS ICON RECUEAR BASIS

Fifthe case of Promotion of GIF(BPS 15) to SCI. (BPS 16) was considerated the DPC decided as under

• [									
	Cratal's	No. of Sa	netlund's	Mot CT 1959	行列的"数型"	TARREST COLUMNATOR	的现在分词	的共和的特别的	- 2 SE   3
ij	1177 61	is of SC	THE REST OF	在下部。但如	2100225222	Property Comments	North Liver Co.	(1) 10 10 10 10 10 10 10 10 10 10 10 10 10	11. M. B.
	10000	ar erenio	3005E5.E	A CONTRACTOR	31052223573	CENTRAL DE	2.534 65 (12)	FOR THE PARTY AND	ş.L
	Panare	1.000000		LINE ALES	1638365633	OF SUCH DESCRIPTION	The Residence	黑热性的时间	和沙人
,	Airen	IV. III OIII	Zanom iza	ING I WINNE	Property Commence	14761-12.4516	SIDA SERIO	明和政党等等的	E#85/18
ı	Avan	Dickent	101 1 05 01	doillo SC 152	LATE STAN	Handar F. Land S. C.	AND THE PARTY	REAL PROPERTY.	KS BUSS
ż	(liropp	sed to Lit	or granio	DSCTATE A	1488 5751	TELEVISION OF THE PROPERTY OF THE PARTY OF T	77 12 Y 12 Y 14 Y 15	-11.5% 1/25 A.A.A.	\$ 12.56.00 Sep
π,	1.115/67	Add of the	aman linus	DISCHALL AND	17133-59	The second second second second	14. 15. 15. 15. 15.		

х				20.00		5 5 5 Cale at a	しょくしょうご さきかい とんりょく	1. Table 18 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	TO THE PARTY OF TH	
275	4.5 727	1	/27 · • • · · · · ·	5 3 A Sept. 3 35 A	52 52 75 July 1	2		Tale of the farmen and came		
. T.			K. 14	34-54-34-73-4-6	Half of the control of the San			Constitution to the Constitution of the Consti	WITH A TAX TO THE PARTY OF THE	
							Charles in the Call	Hill restarting to the	in acceptable and officer	4 4
	TAX THE STATE OF	la since ne	(1-x3-X	nme of Seac	militilinte oft	A STRUME UNDER	PROVEHING TO THE			
1113	Line History	h'some ore			A Comment	PERSONAL PROPERTY.	5.10 mg (1444) [13]	HEROCOPHIC CONTRACT	**************************************	~7
						Appill as Reculary	JIMPENTALKIII III IX			
. 1	* D. H. N. 1.7.1	IKO (tiela) 🖾	22.3	The second second	101:311311111111111	4 Kat A Dahrer was	111111111111111111111111111111111111111		A 1 ( C. 1977)	
1127		1,000	76-41 LLF	- Park and the State of the	Part of the second	fige to a substitution of the	Olf and the second	1202 Tel 10		e 18
*17.*	*****   [******			A	The state of the s	"" I hik tert i i in Ful 6	6310UUUIIIIGH32467	14.5.0 43.11.13.11.13	0.5************************************	
. 1 1 1 1 1	• 342 * 10 10 10 10 10 10	14077191518	مجموع إلا إطلا	AL MARKS IN				I de la contrata la la compania la contrata la contrat	COLUMN TO THE PARTY OF THE PART	W.
1111	********	The Bellet of Their	********		and the last of th	4747. 1 January 712 Ave. (*)	A LEADING TO A STATE OF	PACT AND MANAGEMENT	* 4 - 100 - 11 - 11 - 11 - 11 - 11 - 11 -	- 1
ш	Production of the Party of the		100 00 1 1 1 1	\$44 WAY \$100 CO	3.45 BAR - 4		<b>《大学》第二</b> 章	A STATE OF THE PARTY OF THE PAR	A STATE OF THE PARTY OF	1-6
	Bringhell (19,418)	+					The second second	Little for a read bil	00/2021 to E. W. 235-235-1	
H					J.Y.aimeri IVIO	70.1 (1) (3) 7(1)(	THE ATA MEDICAL			
-1:1	17~*************	l i lamuuta'i	man III.	MINIO ARMI	11/10/11/17	10 Lulia Hean.	Charles Com COD AT	TUDY YOUR TRANSPORT	4.3 - C. T.	
	11.500	1	- 11/-	M. Wand At Full	the first territory	VPD-1127	**	Labera water a year.	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
				37.1	7	**************************************	The state of the s		THE PERSON NAMED IN COLUMN TWO IS NOT THE OWNER, THE PERSON NAMED IN COLUMN TWO IS NOT THE OWNER, THE PERSON NAMED IN COLUMN TWO IS NOT THE OWNER, THE PERSON NAMED IN COLUMN TWO IS NOT THE OWNER, THE PERSON NAMED IN COLUMN TWO IS NOT THE OWNER, THE PERSON NAMED IN COLUMN TWO IS NOT THE OWNER, THE PERSON NAMED IN COLUMN TWO IS NOT THE OWNER, THE PERSON NAMED IN COLUMN TWO IS NOT THE OWNER, THE PERSON NAMED IN COLUMN TWO IS NOT THE OWNER, THE PERSON NAMED IN COLUMN TWO IS NOT THE OWNER, THE O	٠.
. III	( ) - ( ) - ( ) - ( ) - ( )	1.76.		ADDRESS PROPERTY AND ADDRESS			- 1 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1	Phylogenical Control	SAME THE STATE OF	
		<del></del>	4		THE PART OF THE	ቀረ፣፤ የነነበብ ንርብ	DITTELAND.COMPINE	the Little or the parties	T. T. S.	
УГ.	erwell er a'	I-Nabila Cit	1134110	วีได้การ 113มเล	LT114   VQ. U 1717	233 / 111 / 03-405	11 - 12 - 12 - 12 - 12 - 12 - 12 - 12 -	サルメチオ ヤー・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・	(	ıέξ
/al:					and the state of t	1 17-1	ひしつ ひきというじょりょう	TOTAL STREET	A 4 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	11-
	19. TW. 1									
	47.	1-11-7/42	→ • • • • • • • • • • • • • • • • • • •	\$13713 A.M 13 TI	11. 24 22 22 2			PRESIDENT	ないい ロッチアスドルス ごこうごうだい	
: L-1	110000						1 THALAYAL 64 TOP	I Lit tot hilosopi	*************************	12
ш.	4 7 4 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	4:111	2.11 2.11 1	さいしんりく とりしょり	: M3:1:11113_111_13	1775 FUL 6'A301.				113
- 1 i -	11.47	1.   \$4441144 19		4 4 4 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		Contractor of the Contract of	E STATE OF S	THE RESIDENCE OF THE PARTY OF T	Carlo Marie and American and Person and American	16
T. I i		17.			N 17 11 12 12 12 12 12 12 12 12 12 12 12 12	STATE OF THE AREA OF THE	C. Martin Mark Martin Co. Co.	4 004 202		11.
עוני	A A	lifteriumb.	237751.73	Indiaci carata	40.00	A4 - 12 - Christian		Pile not submi	the drawn for the Bally A.	111
511. 3	77 4. 44					201 20 21201	TO THE LABORATION OF THE PARTY	5[ik/l¢ Ձ¢i/չորյու	THE PARTY OF THE P	1.7
и.				T / 1 & 4 C . & 1	יויות תויוסי	350 F 'XAIF2UT	J. 1. C. P. TZZCZ - 202. J.	<b>新文学人</b> (14)		10
ΧĽ	***********	1 Namura 1		OONIS Name	7111	The second secon		21.17.17.17.17	The state of the s	42
		1.	2.757.15	2.3	ひきじょう くさ かしんし	20	2 1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	Charles Anna San Princip		а:
	ロム・リ ししきごうし	1	* J .   1		(4) 对抗性性 电	A				. 1 3
		Yasmeet	4	KILLIA CA			and the supplication of	illi for promo	HUDIAL AND SELECTIONS	110
A					\$24.21 16:10.1°	067   71   81 701	111101010101010			11
	CANCEL CALL CO.	:DBoshraX		GGH5 Khan	400 Z 11 10:10.1	, , , , , , , , , , , , , , , , , , , ,	TO 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	There was and and		-11
111	311 1511 11.10		100		See Park auto anne	-011	- Y	FIRST TALL BY SALES	Jefal for the party and the	-1:
1.11	T-121-11-11-11-11-11-11-11-11-11-11-11-11	4 1	4V4		10. (27)			PX Prints	The state of the s	÷ij.
<i>/</i> 113	A STATE OF THE STA	il illegum_		Canada Menderal	200 100 - 100 -			a little constitution or result	noted to SCI, as pera-	31
( ) [ [						075   21,01,201	TARALA ARCUANT	-54517 COPEU (125)		л.
73 f	0.4454	11:00	*î * 1*	A CHEO DEBA	ו.מוו.וטוויויייי	012 [ 71]01:201	**	417	marked sections to 1. Hills 747	31
	んべつけいしゃ	tivalennu a	1773-3 111	WO1.0'22112	01.06.1	and the second of the second	والمراجع والمساورة المراجع	o treecord and th	quiry report of this H	41
·ι		41: /	× 11	እ እ ል የ ፍርሲ ነገ እን <sup>ሚ</sup>	3.55 P. 43		イントアル とうたれん ガ	Q 12. 15 3. 5 1. 5 1. 5	Land Committee of the C	اند
911		4.5	FA 63	A	ሳማር በተፈጠጀት እንዲ	12	will 1535 A 297 Ct 75 A	and the first of t	"Hanted" LLUI V. Vi.	31
7	あつぶんちい かだら	4450 A	4. 44.13	3.0	・2 もい サンカルご	·想到中国人的基础的	べいしぶ とごうせん おば	ATHURITY MEIN AND	Dated [11.01.2020]	T.1
	(C) (C) (C) (C) (C)	u i al-			* P * 10.350313	The Branch (1974)	CAL CAST 15-12	C. M. 2017 = 7 € 14-71	univilun is berein and	1'1
. I.	Acces all to the second	21 - 234.9	2.0		こせい しんぱつじ	★2 1. (5V th 1)	307 (2009) 1.94 LO	Military lief. Df	othermum necessions with	ات
6. II.	1.5 11 6 11 12 1	PERSONAL PROPERTY.	3 1 64 P		G. B		TO LETTER MANAGEMENT		10 12 12 13 13 15 15 15 15 15 15 15 15 15 15 15 15 15	32
W.1	Sens 1371	31 : 91 M. ek	20 miles (1)		3474 L 1 1 2 2 1		V +1402Frv +71 3x 3	والمراكبة والمراجع المراجع المراجع	dear and	5,7
t I	pararar di a d'	11.00	47. 7 1416		والمراجع المراجع	A 5	15 - 1605 a 2014 (CC 1741)	271177) (EE 116277-197	110 10 10 10 10 10 10 10 10 10 10 10 10	
	2445 7 144 1	2.196 2.67	- Curic il.		Constitution is		Water Party and and area		moted to SCI as per	*
Cit:	3, 11, 2, 4, 5	11-24-11-23	ara Gali	. 41 14 61 7	11 pm 2 11 5-2 - B 4			urial Versionis nro	mated to SC 1.05 Pc 12.	1.
o ii		4 1-1 -1-1				ACA 1.33 01170	tarbina Hedszer	2012/04/04/04/04/05	ar an all the bear of the second	
35				GGMS Rebi	man=_1103.12.1	A0A 1.51.01.40	**************************************		inquiry repairs of this ?	40
	7 (62 111 11)	a laYasnice	13.55	CANADA WELL	*****	「シー・ロン・ケカイン・	医福耳基氏 医皮肤性神经神经	is treened unu i	HOURS 3/1 4 July 2 GG 300 3/4	11.0
. T (:	: - 636.18 23				water Library	・ 大切・ ド・・・ きょうけん	TO A LOCK OF THE ALL AND A SHAPE OF THE ALL A			42.2
3.	3/21/21/12 3 93	the LL and proved	2011/11	Shall de a san	4.2CV. 15.545.2	P 2 2 1 1 1 1 9 7 7 7 1 1	Karl Land Carlot Talling	office held o	~ 1)5(pd)  1.0  20/02/	146
	YOUR TRANSPORT	l la Beguniji	">t:u:11		The Carl Marie Carl	A CONTRACTOR OF THE PARTY OF TH	TENED TO THE SECOND	Paris Office ucin o	The second secon	u٩
- 1	1554	1 1 1 1 1 1 1 1 1 1 1 1 1	105.01	コマナリス・イブン・カイン・ス	ላዊ፣ ዓመተነት ነነም ነ	- 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1	THE PROPERTY OF THE	Maria 12	***************************************	
51 1	44719	1 2 1 1 2 1 1 2 1	74. 2711	ALT 7 WOOL OL	的现在分词的人	dated by the	しょし ありがり はまったん	belikteree her it	romution is hereby	
1	かいいしてい	61.5	1.25		<b>研究 2011 155 以</b> 的	OTATALA, SERIAN			ren - con at co and black the	. 14
1.	2014	V. 1. 1. 2. C. 1. A. 7.		THE STATE OF THE S	237.241.33.27	·安徽、中华、西京、大学、	4 753 A. C. WY 4377 C. P.	<b>第21字 5013 第25日本</b>	please, sur Edianas	w
		901233664	<i>314</i> 4301		J-47, TV-1, 157, OVA	ごうこく ノード・サイン・サイン・ダー	44.714-77-53-020-1-1-2	COLUMN OF THE RESERVE	III. Hatta	_
. 1	11		77722	LOCK MATERIA		79/1 / 1 1 1 2 4 5 4 <del>4 4 4</del> 7 4	ALM I LAW WOOD A CO.		The second second section is a first second section in	Jr.

#### CERTIFICA

All the CTs (Male Fernale) have been included in the panel for promotion to SCT to assess that the CTs (Male Fernale) hold the post on regular basis and none of them is on behavior change change (canade has a required of the CTs (Male Fernale) have completed the required innimum length of multiving service and quadrictanisms as required to a factor of the CTs (Male Fernale) have completed the required innimum length of multiving service and quadrictanisms as required to a factor of the CTs (Male Fernale) have completed the required innimum length of multiving service and quadrictanisms as required to a position of the CTs (Male Fernale) have completed the required innimum length of multiving service and quadrictanisms as required to a position of the control of the CTs (Male Fernale) have completed the CTs (Male Fernale) have completed in the CTs (Male Fernale) have completed the CTs (Male Fernale) have completed in the CTs (Male Fernale) have completed the CTs (Male

Their appointed order regime CT poor is mached below that the country of the control of the regime of the control of the contr

respect.





# Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar,

iwa Peshawar

### **Notification**

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyher Pakhtunkhwa Elementary and Secondary Education Notification NoSO(B&A)/1-18/E&SE/2012 dated 11.07.2012 and Finance Department Endorsement No SO(FR)/FD/10-22(E)/2010 dated 16.07.2012, the following Female CTs/DMs/Ats/& TTs (BPS-15) are hereby promoted to the post of Senior CT/Senior DM/Senior AT/ &Senior TT (BPS-16) (16s. 18910-1520-64510)) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and further they will be posted in the Government Higher Secondary /High Schools by the District Education Officers concerned against vacant post of Senior CT/Senior DM/Senior AT/Senior TT & Senior PET (BPS-16) posts.

i.CT to SCT(BPS-i6)

	1.CT to SCT(IPS-16)							
 S. No.	S.L. No.	Name of Official	Present Place of Posting	Date of Birth	Date of Appti; as Regular CY	Remarks		
· <del></del> - ` ·-	10	Sanuna Yasmeen	GGAS Numa-	30/3/1980	28/1/2013	Services placed, at the disposal of DEO Sub Division Hassan Knel for further posting		
2	14	Mehrunnisa	ASDEO Sidi Direction Hassan Kinel	1/6/1975	21/1/2013	Her promotion order issued Vide Endst No 6293-99 dated 7/12/2020 is hereby withdrawn with immediate effect being Junior at S No 1		
 3	15	Yasmeen Begum	GGUS Rerman Shah	3/12/1959	21/1/2013	Her promotion order issued: Vide Endst No.6293-99 dated 7-12-2020 is hereby withdrawn with immediate effect being Junior and further her services may placed at the disposal of D.F.O. Hassan Khel for further posting adjustment against vacant C.I. post		

_				111110	
2.	11.31	10.5	DM	BPS	-107

S.	S.L.	Name of Official	Present Place of Posting	Date of	Date of Apptt; as Regular DM	Remarks
i i	€	Yasmeen Gul	GGM5 Ruman	12/9/1952		Considered statable for a promotion to the post of a Senior 19M (BPN-16) on regular basis with immediate effect instead of 7/12/2020

Scanned with CamScanner

respect.

1 2 FT 1-