


01.08.2016

None for the appellant present. Mr. Nasrullah, ADO alongwith Mr. Muhammad Zubair, Sr.GP for the respondents present. Due to non-submission of rejoinder and non-availability of D.B arguments could not be heard. Notice be issued to appellant and her counsel. To come up for rejoinder and final hearing on 08.11.2016 before D.B at camp court, Swat.


Chairman
Camp court, Swat.

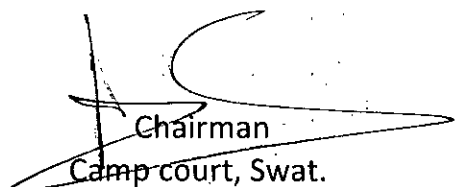
08.11.2016

Alamzaib Khan, husband of the appellant alongwith counsel for the appellant and Mr. Muhammad Shoaib, ADO with Mr. Muhammad Zubair, Sr.GP for the respondents present. Learned counsel for the appellant submitted application for withdrawal of the appeal as grievances of the appellant have been redressed by the department.

In the light of the above, the appeal is dismissed as withdrawn. File be consigned to the record room.


Member


ANNOUNCED
08.11.2016


Chairman
Camp court, Swat.

08.11.16.


5.10.2015

Mr. Alamzeb, husband of the appellant and Mr. Nasrullah, ADEO alongwith Mr. Muhammad Zubair, Sr. GP for respondents present. Requested for adjournment. To come up for written reply/comments on 7.12.2015 before S.B at Camp Court Swat.


Chairman
Camp Court Swat

7.12.2015

Mr. Alamzeb husband of the appellant and Mr. Nasrullah ADEO alongwith Assistant A.G for respondents present. Application for rejection/dismissal of appeal submitted according to which the grievances of the appellant have been redressed as she has been promoted vide order dated 31.7.2015 on regular basis. To come up for reply and arguments on application on 3.2.2016 before S.B at Camp Court Swat.


Chairman
Camp Court Swat

3.2.2016

Mr. Omer Dher, Advocate on behalf of counsel for the appellant and Mr. Nasrullah, ADO alongwith Mr. Ameer Qadir, GP for respondents present. Para-wise comments submitted by the respondents while request was for adjournment was made for reply to the application of respondents. The appeal is assigned to DB for rejoinder and reply by appellant and final hearing for 1.8.2016 at Camp Court Swat.


Chairman
Camp Court Swat

3

29.04.2015

Appellant Deposited
Security & Process Fee



Counsel for the appellant present. Learned counsel for the appellant argued that the appellant is serving as Senior Qaria and on the basis of 3% quota reserved for such officials entitled to promotion to BPS-16 but was deprived of the same due to mis-calculation of the quota and allocating posts more than the proportion meant for initial appointment. That against the impugned order dated 13.12.2014 the appellant preferred departmental appeal on 22.12.2014 which was not responded and hence the instant service appeal on 22.4.2015.

That the appellant is entitled to be promoted to BPS-16 on the recalculating of quota in accordance with the prescribed manners.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for 27.7.2015 before S.B.


Chairman

4

27.07.2015



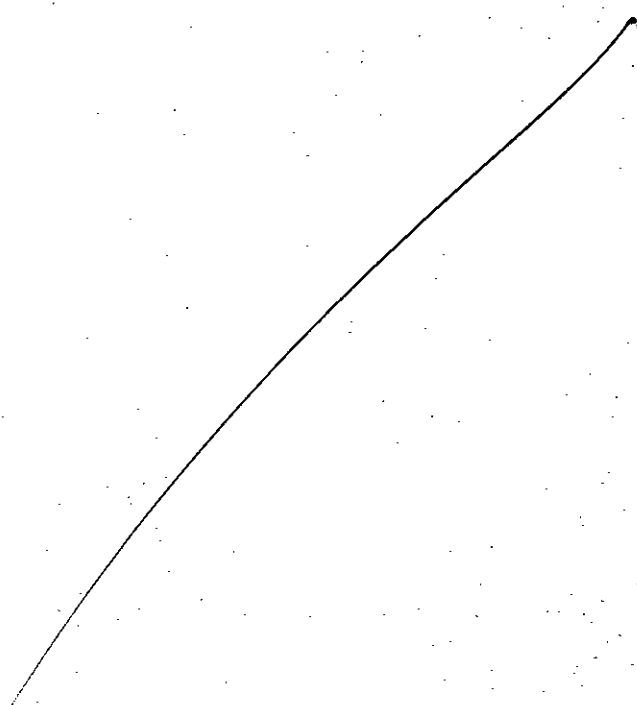
Counsel for the appellant, M/S Javed Ahmed, Supdt. and Noor Muhammad ADO alongwith Addl: A.G for respondents present. Requested for adjournment. The appeal pertains to the territorial limits of Malakand Division as such to be heard at Swat. To come up for written reply/comments on 5.10.2015 before S.B at Camp Court Swat.


Chairman

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 356/2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	22.04.2015	<p>The appeal of Mst. Nasreen Iqbal presented today by Mr. Saifullah Mohmand Advocate, may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p>
2	27-4-15	<p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>29-4-15</u></p> <p style="text-align: right;"> CHAIRMAN</p> 

**BEFORE THE CHAIRMAN SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA,
PESHAWAR**

Service Appeal No. 356 /2015

Mst. Nasreen Iqbal

Versus

Government of K.P.K though Elementary & Secondary
Education Department & others

INDEX

Serial No.	Description of documents	Annexure	Page No.
1.	Memo Of appeal		1-7
2.	Affidavit		8
3.	Copy of Notification dated 24 th July, 2014	"A"	9-15
4.	Copy of Notification No.3696-3702 dated 01.11.2014	"B"	16-19
5.	Copy of NTS appointment order No.2108-15	"C"	20-23
6.	Copy of Office Order No. 60-64 dated 29-07.2013	"D"	24
7.	Copy of the impugned Office order No.45-15-80 dated 13.12.2014	"E"	25-26
8.	Copy of representation/departmental appeal	"F"	27
9.	Wakalat Nama		28


Appellant

Through

(SAIFULLAH MOHMAND)
Advocate, Peshawar.

Office: -

107-B, Town Tower, Jahangir Abad,
University Road, Peshawar.

Cell No.

0321-9117280

Dated: - 03.04.2015

(1)

**BEFORE THE CHAIRMAN SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA,
PESHAWAR**

Service Appeal No. 356 /2015

**P.W.F. Provincial
Service Tribunal**
Diary No. 375
Dated 22-4-2015

Mst. Nasreen Iqbal Senior Qaria, Government Girls Higher
Secondary School, (GGHSS), Ziyarat, Talash, District Dir
Lower.....Appellant

Versus

- 1). Government of Khyber Pakhtunkhwa, Elementary and
Secondary Education Department, through its Secretary.
- 2). Director Elementary and Secondary Education Department,
Khyber Pakhtunkhwa, Peshawar.
- 3). District Education Officer (F), District Dir Lower.
- 4). Secretary to Government of Khyber Pakhtunkhwa,
Establishment Department, Civil Secretariat, Peshawar.

.....Respondents

**APPEAL UNDER SECTION 4 OF THE SERVICE
TRIBUNAL ACT, 1974 AGAINST THE ORDER
NO. 45-15-80 DATED 13.12.2014, WHEREBY THE
APPELLANT WAS NOT CONSIDERED FOR
PROMOTION, IN ACCORDANCE WITH POLICY
/LAW.**

**Filed to
Registrar**
22/4/15

PRAYER IN APPEAL:-

**ON ACCEPTANCE OF THE INSTANT
APPEAL, THE ORDER DATED 13.12.2014,
MAY KINDLY BE SET ASIDE AND THE
REONDENTS MAY KINDLY BE
DIRECTED TO PROCESS FRESH
PROMOTION /RECRUITMENT**

**PROCESS, PURELY IN ACCORDANCE
WITH LAW/POLICY AND THEREBY
CONSIDER THE APPELLANT,
ALONGWITH OTHER SIMILARLY
PLACED EMPLOYEES AND TO
PROMOTE THEM, ACCORDINGLY,
WITH ALL BACK BENEFITS.**

RESPECTFULLY SHEWETH:

1. That the appellant is a Master Degree Holder in the subject of Islamiyat and has also passed B.Ed examination and is performing her duties as Qaria, in the Government Girls Higher Secondary School, Ziyarat, Talash, District Dir Lower, with zeal and devotion and to the entire satisfaction of her superior officers.
2. That the Government of Khyber Pakhtunkhwa vide Notification dated 24th July, 2014, introduced a policy for departmental Promotion, for different Cadre of Teachers. (Copy of Notification dated 24th July, 2014 is attached herewith as *Annexure "A"*).
3. That in the said Notification/Policy, female teachers, having at least Bachelor Degrees and B.Ed/M.Ed or Master qualification, were ordered to be promoted to the post of Secondary School Teachers BPS-16, on the basis of formula that 25% posts were to be filled by way of initial recruitment and 75% posts were to be filled by way of promotion from amongst seniors female teachers of different cadre.
4. That in the light of said policy/Notification, respondent No.3 issued a Notification No.3696-3702 on dated 01.11.2014, whereby 55 posts were filled by way of promotion from amongst different cadres of female teachers and vide Appointment Order No.2108-15 dated 30.04.2014, 17 posts were filled by way of initial recruitment through NTS. (Copy of Notification No.3696-3702 dated

01.11.2014 and NTS appointment order No.2108-15 are attached herewith as *Annexure "B" & "C"* respectively)

5. That amongst 13 Senior Female Qari teachers, only 3 teachers including the appellant, were qualified and eligible for promotion as they were having B.Ed qualification as required by the above-mentioned policy, hence the 2 senior most were promoted while appellant being joiner to them, was not promoted. (Copy of Office Order No. 60-64 dated 29-07.2013 is attached herewith as *Annexure "D"*).
6. That on dated 13.12.2014, respondent No.3 issued another office Order No.45-15-80/dated 13.12.2014, whereby 13 female teachers of different cadres were ordered to be promoted to the post of Secondary School Teachers BPS-16 (SST), while 16 posts are going to be filled by way of initial recruitment through NTS. (Copy of the Office order No.45-15-80 dated 13.12.2014 is attached herewith as *Annexure "E"*).
7. That the appellant being on the top of qualified and eligible female teachers, was not considered for promotion, while other blue eyed female teachers, were promoted to the post of Secondary School Teacher BPS-16, in utter disregard of the policy mentioned above.
8. That against the said illegal acts and actions of the respondents, the appellant moved his Representation/departmental appeal to the concerned authorities on dated 22.12.2014, wherein she explained her grievances but the same was neither decided nor forwarded to the competent authorities by him, within the statutory period of 90 days.
(Copy of representation/departmental appeal is attached herewith as *Annexure "F"*).

9. That aggrieved from the acts and actions of the respondents, the appellant having no other remedy but to approach this Honorable Tribunal for the redressal of her grievances, within the statutory period of one month on the following grounds inter-alia.

GROUND:-

A). That the impugned Orders dated 13.12.2014, is illegal, unlawful, against the newly inducted policy and against the principles of nature justice, hence untenable.

B). That according to the Serial No "1B" sub-serial No. 1 (f) of the above-mentioned policy, 20 % posts, were to be promoted from the Primary School Heat Teachers (PSHT), hence if mathematical calculation is made in the following manner

Total Teachers Promoted= 13
Share of PSHT in Policy= 20%
Percentage by Promotion= 75%

$$\frac{13 \times 20}{75} = 3.466$$

Hence only 3 female teachers were required to have been promoted but instead of 3 teachers 4 female teachers were promoted, in utter disregard of the policy and thereby committed serious discrimination.

C). That according to serial No. "1B" sub-serial No. 1 (e) of the above-mentioned policy/Notification, 3 percent posts, are to be promoted from amongst the Senior Qaris (Female) Teachers,, hence if the the meethimetical is made in the following manner,

Total Teachers Promoted = 13
Share of Senior Qari (Female) in Policy = 03%
Percentage by Promotion = 75%

$$\frac{13 \times 03}{75} = 0.52$$

Hence the respondent department was required to have promoted one Teachers from amongst the Senior Qari (Female), and the appellant being on the top of qualified and eligible teachers, was entitled for promotion but the respondent department, deliberately ignored her, in utter discrimination and in violation of the policy mentioned above.

D). That in order to promote the blue eyed and favorite child, the respondent Department is not following the above-mentioned policy as according to the Serial No. "1B" Sub-serial No. i as incorporated in column No.5, which reads as under

"i. Seventy five per cent by promotion, on the basis of seniority-cum-fitness, from the district concerned in the following manner"

While Serial No. "1B" sub-serial No. ii as incorporated in column No.5 of the said policy, which read as under

"ii. Twenty five per cent by way of initial recruitment"

Hence, if the respondents were going to promote 13 female teachers of different cadres then by using 25% policy, only 4 female teachers should have been promoted by way of initial recruitment, but the respondent department has promoted 16 teachers by way of initial recruitment through NTS, whose result are still awaited.

E). That on the other hand if the respondent was bent upon to promote 16 female teachers by way of initial recruitment through NTS, then he was required under the policy to have promoted 48 female teachers from amongst the different cadres of female teachers by applying 75% formula, but the respondent failed to do so.

F) That if the respondent No. 3 is allowed to make promotion in violation of the above-mentioned policy/Notification, the appellant would never be able to get promotion throughout her life.

- G). That respondent No.3, in order to accommodate and adjust his blue eyed employees of the department violated policy percentage even in the first Notification (Annex-"B"), issued by him.
- H) That the appellant has been serving on the above said post since 19/20 years on the said post and since long she has been waiting for her turn to be promoted to some higher scale, however after having a tenure of such a long legitimate expectations the appellant has been treated unlawfully without any cogent/solid grounds.
- I). That the said act of the respondent department is not merely illegal as well as unlawful, but is also against the very clear Article of Constitution of Islamic Republic of Pakistan as engraved in the basic rights of said constitution.
- J). That the appellant has got every right to be treated equally with his other colleagues and closing all the ways of up-gradation/promotion for the appellant is against all the norms of justice as it has been done in the above mentioned Office Order dated 13-12-2014.
- K). That the appellant craves the permission of this Hon'ble Tribunal to raise any other ground or proof at the time of arguments/hearing of the instant case.

For the afore mentioned reasons, It is, therefore, humbly prayed that on acceptance of instant Appeal, this Honourable Court, may graciously be pleased to set aside the impugned order /Notifications dated 13.12.2014 and the respondents may graciously be directed to process fresh promotion/ recruitment process, strictly in accordance with law/policy mentioned above and thereby consider the appellant, along-with other similarly placed employees and promote them to the post of Secondary

School Teacher (SST) BPS-16, accordingly, with all back benefits of the services.

Any other relief deemed fit by this Hon'ble Tribunal under the circumstances, may also graciously be granted in favor of the appellant.



Appellant

Through

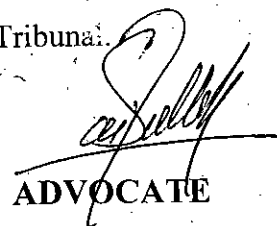


(SAIFULLAH MOHMAND)
Advocate, Peshawar.

Dated: -03.04.2015

CERTIFICATE:

Certified that as per information furnished by my client no such like service appeal on the subject has earlier been filed in this Hon'ble Tribunal.


ADVOCATE

8

**BEFORE THE CHAIRMAN SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA,
PESHAWAR**

Service Appeal No. _____/2015

Mst. Nasreen Iqbal

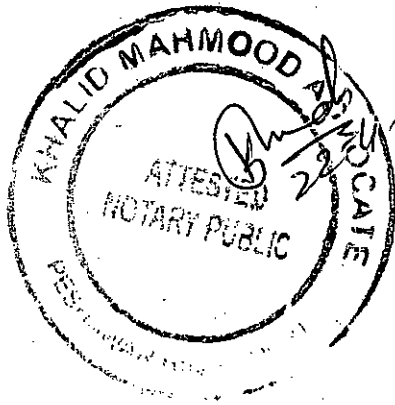
Versus

Government of K.P.K though Elementary & Secondary
Education Department & others

AFFIDAVIT

I, **Saif ullah Mohmand**, Advocate, Peshawar High Court, Peshawar,
as per instructions of my client, do hereby solemnly affirm and declare
on oath that the contents of accompanying appeal are true and correct, to
the best of my knowledge and believe and nothing has been concealed
from this Honorable Tribunal.


DEPONENT



(9)

Annex A1



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Peshawar, dated the 24th July, 2014.

NOTIFICATION

No.SO(PE)4-5/SSRC/Meeting/2013/Teaching Cadre:- In pursuance of the provisions contained in sub rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department hereby directs that in this Department's Notifications No.SO(G)S&LD/1-28/2003/Vol-II dated, 09-04-2004, Notification No.SO(G)S&L/1-69/06/Vol-1/DPE/LIB dated, 13-11-2007, and Notification No.SO(PE) 4-5/SSRC/Meeting/2012/Teaching Cadre, dated, 13.11.2012, the following further amendments shall be made, namely:

AMENDMENTS

In the Appendix,-


- (i) Serial No. 1 shall be renumbered as 1B and before Serial No. 1B, as so renumbered, the following new entries shall be inserted in respective columns, namely:

1	2	3	4	5
"1.	Subject Specialist (BPS-17)	i. At least second class Master's Degree or four years BS Degree in the relevant subject; and ii. Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A Education or equivalent qualification from a recognized University.	23 to 35 years	(a) Fifty per cent by promotion, on the basis of seniority-cum-fitness, for the relevant subject from amongst the Secondary School Teachers (BPS-16), with at least five years service as such and having qualification mentioned in column No. 3. Note: If no suitable candidate is available in the relevant subject the post falling in their promotion quota shall be filled by initial

(1)

[Signature]
ATTESTED

				recruitment; and (b) fifty percent by initial recruitment.
1A	Director Physical Education (BPS-17)	At least second class Master's Degree in Physical Education from a recognized University.	22-35 years	(a) Fifty percent by promotion, on the basis of seniority-cum-fitness, from amongst Senior Physical Education Teachers (BPS-16), with at least five years service as Senior Physical Education Teacher and Physical Education Teacher and having qualification mentioned in column No. 3: Provided that if no suitable person is available from amongst Senior Physical Education Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst the Physical Education Teachers, with at least five years service as such and having qualification mentioned in column No. 3; Note:- If no suitable candidate is available in the relevant cadres of the above teachers, the post falling in their promotion quota shall be filled by initial recruitment; and (b) fifty percent by initial recruitment"; and


ATTESTED

(ii) against Serial No. 1B, as so renumbered, for the existing entries, the following Shall be substituted, in respective columns, namely:

1	2	3	4	5
"1B.	Secondary School Teacher (BPS-16)	<p>I. At least second class Bachelor Degree's from a recognized University on need basis from the following groups with two subject</p> <p>(a) (Chemistry, Botany or Zoology), Or (b) (Physics, Maths "A" or "B" or Statistics) Or (c) (Humanities and other equivalent groups at degree level with English as compulsory subject;</p> <p style="text-align: center;">and</p> <p>II. Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A Education or equivalent qualifications from a recognized University.</p>	21 to 35 years.	<p>1. Seventy Five per cent by promotion, on the basis of seniority-cum-fitness, from the district concerned in the following manner:</p> <p>(a) forty per cent from amongst the Senior Certified Teachers (BPS-16), with at least five years service as Senior Certified Teacher and Certified Teacher and having qualification mentioned in column No.3:</p> <p style="text-align: center;">Provided that if no suitable candidate is available from amongst Senior Certified Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers, with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(b) four per cent from amongst the Senior Drawing Masters(BPS-16), with at least five years service as Senior Drawing Masters and Drawing Masters and having qualification mentioned in column No.3:</p>


ATTESTED

				<p>Provided that if no suitable candidate is available from amongst Senior Drawing Masters for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Drawing Masters with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(c) four per cent from amongst the Senior Arabic Teachers(BPS-16), with at least five years service as Senior Arabic Teachers and Arabic Teachers, and having qualification mentioned in column No.3:</p> <p>Provided that if no suitable candidate is available from amongst Senior Arabic Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from Arabic Teachers with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(d) four per cent from amongst the Senior Theology Teachers(BPS-16), with at least five years service as Senior Theology Teachers and Theology Teachers and having qualification mentioned in column No.3:</p>
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(13)

				<p>Provided that if no suitable candidate is available from amongst Senior Theology Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Theology Teachers with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(e) three per cent from amongst the Senior Qaris (BPS-16), with at least five years service as Senior Qari and Qari and having qualification mentioned in column No.3:</p> <p>Provided that if no suitable candidate is available from amongst the Senior Qaris then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from Qaris with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(f) twenty per cent from amongst the Primary School Head Teachers (BPS-16), with at least seven years service as Primary School Head Teachers and Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No. 3:</p> <p>Provided that if no suitable candidate is available from amongst</p>
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ATTACHED

				<p><i>Primary School Head Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least seven years service as Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No.3;</i></p> <p><i>Provided further that if no suitable candidate is available from amongst Senior Primary School Teachers for promotion then the post shall be filled from amongst Primary School Teachers with at least seven years service as such and having qualification mentioned in column No. 3; and</i></p> <p>(ii) <i>twenty Five percent by initial recruitment.</i></p> <p>Note:</p> <p><i>I. If no suitable candidate is available in the relevant cadre of the above teachers, the post falling in their promotion quota shall be filled by initial recruitment.</i></p> <p><i>II. Posts of General SST and SSTs-1 Science and SST-2 Science shall be filled by promotion or initial recruitment, each on need basis separately."</i></p>
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**SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**

Endst : of even No & date:

1. The Secretary to Government of Khyber Pakhtunkhwa, Establishment and Administration Department Peshawar.
2. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department Peshawar.
3. The Secretary to Government of Khyber Pakhtunkhwa, Law Department Peshawar
4. The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.
5. The Accountant General Khyber Pakhtunkhwa Peshawar.
6. The Director, Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
7. The Director of Education (FATA) Peshawar.
8. The Director, Curriculum and Teacher Education Khyber Pakhtunkhwa Abbottabad.
9. The Director, (PITE) Khyber Pakhtunkhwa Peshawar.
10. The Director, ESRU Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
11. Manager Government Printing Press Khyber Pakhtunkhwa Peshawar.
12. The Deputy Director, EMIS (S&SE) Department Khyber Pakhtunkhwa Peshawar.
13. All District Education Officer (M&F) in Khyber Pakhtunkhwa.
14. All District Account Officer in Khyber Pakhtunkhwa.
15. All Agency Education Officer in FATA
16. All Agency Account Officer in FATA.
17. PS to Governor Khyber Pakhtunkhwa. Peshawar.
18. PS to Chief Minister Khyber Pakhtunkhwa. Peshawar.
19. PS to Chief Secretary Khyber Pakhtunkhwa. Peshawar.
20. PS to Minister E&SE Khyber Pakhtunkhwa. Peshawar.
21. PS to Secretary E&SE Khyber Pakhtunkhwa. Peshawar.
22. Master file

(ZAMIN KHAN MOMAND)
SECTION OFFICER (PRIMARY)



(7)

ATTESTED

16

Departmental order

Annexure (B)

OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE DIR LOWER AT TIMERGARA.

NOTIFICATION.

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary & Secondary Education Notification No. SO (PE) 4-5/SSRC/Meeting/2013/Teaching Cadre dated 24 July 2014, and vide Director Notification No. 3528-34/File No.2/Promotion SST B-16 Dated 28-10-2014, the following SCTs/CTs, SDMs/DMs, SATs/ATs, STTs/TTs, Senior Qarias / Qarias, PSHTs / SPSTs/PSTs are hereby adjusted to the post of SST(Bio-Chem) and SST(General) noted against each in BPS-16 (Rs.10000-800-31000) plus usual allowance as admissible to them under the rules on regular basis under the existing policy of the Provincial Govt: on the Terms and conditions given below with immediate effect on "school based".

1. SST (Bio-Chem)

1. PROMOTION OF SCT/CT TO THE POST OF SST (BIO-Chem) BPS-16

Total No. of SST Bio-Chem(F) Post s	27
25% Share initial recruitment	7
75% share for Promotion	20
40% share of promotion of SCT/CT	11
Posts available for promotion	11
Promoted through this order	04

S.No	S.L.No	Name of Official	Present Place of posting	Name of School where adjusted	Remarks
1	69	Zakia	GGHS Kandaro	GGHS Khazana	A.V.P
2	74	Kalsoom Khurshid	GGHSS Ouch	GGHS Osakai	A.V.P
3	132	Rahila Rahman	GGMS Warsak	GGHS Nagrai (P)	A.V.P
4	194	Saeeda	GGHS Koto	GGHS Koto	A.V.P

2. SST (General)

1. PROMOTION OF SCT/CT TO THE POST OF SST (General) BPS-16

Total No. of SST General (F) Posts vacant posts	73
25% Share initial recruitment	18
75% share for Promotion	55
40% share of promotion of SCT/CT	29
Posts available for promotion	29
Promoted through this order	29

NTS = 17

17

S.No	S.L.No	Name of Official	Present Place of posting	Name of School where adjusted	Remarks
1	1	Shaheen Bibi	GGHSS Rabat	GGHSS Rabat	A.V.P
2	2	Hidayat Begum	GGHSS Rabat	GGHSS Rabat	A.V.P
3	3	Maniza Begum	GGHS Sado	GGHS Ranai	A.V.P
4	4	Nasim Akhtar	GGHS Sado	GGHS Koherai	A.V.P
5	6	Jehan Zeba	GGHS Bagh (D)	GGHS Bagh (D)	A.V.P
6	8	Wajida Begum	GGHS Haji Abad	GGHS Haji Abad	A.V.P
7	9	Rehana Yasmin	GGHSS Ziarat Talash	GGMS Toormang	A.V.P
8	10	Husan Bano	GGHS Gusam	GGHS Gusam	A.V.P
9	11	Shehnaz Begum	GGHS Badwan	GGMS Bochakay	A.V.P
10	12	Khudija	GGHS Osakai	GGMS Baroon	A.V.P
11	13	Samina Jabin	GGHS Haji Abad	GGMS Malakand (P)	A.V.P
12	15	Saeeda Begum	GGHSS Chakdara	GGHS Khall	A.V.P

ATTESSED

8

S.No.	S.L.No	Name of Official	Present Place of posting	Name of School where adjusted	Remarks
13	16	Zakia Minhaj	GGHSS Chakdara	GGMS Khall Kalonay	A.V.P
14	17	Zahida Parveen	GGHS Timergara	GGHS Odigram	A.V.P
15	18	Nasira Nawab	GGHSS Chakdara	GGMS Rehanpur	A.V.P
16	19	Musarat Shaheen	GGHSS Ziarat Talash	GGMS Moranai	A.V.P
17	23	Rashida Khanum	GGHS Badwan	GGHS Biyarai	A.V.P
18	24	Seema Bibi	GGHS Shawa	GGMS Mator	A.V.P
19	26	Samia Rahman	GGHSS Chakdara	GGHS Jango	A.V.P
20	27	Razia Kawsar	GGCMSS Timergara	GGMS Danwa	A.V.P
21	28	Farhat Jabeen	GGHSS Samar Bagh	GGMS Likor Kambat	A.V.P
22	31	Samina Jamil	GGHSS Mayar	GGMS Biro	A.V.P
23	32	Zeenat Bibi	GGHS Shawa	GGHS Kadh	A.V.P
24	33	Lubna Muneer	GGHSS Ouch	GGHS Tawda China	A.V.P
25	34	Gulshan Ara	GGHSS Ziarat Talash	GGMS Soghalay	A.V.P
26	35	Naseem Begum	GGHSS Ziarat Talash	GGCMS Tangi Shamshi Khan	A.V.P
27	36	Muharam Bibi	GGHSS Ziarat Talash	GGHS Nagrai (P)	A.V.P
28	38	Nasira Qasim	GGHSS Ouch	GGMS Laram	A.V.P
29	39	Shakila Khatoon	GGHS Kandaro	GGMS Kotkay (Phy)	A.V.P

2. PROMOTION OF PSHT/SPST/PST TO THE POST OF SST (General) BPS-16

Total No. of SST General (F) Posts vacant posts	73
25% Share initial recruitment	18
75% share for Promotion	55
20% share of promotion of PSHT/SPST/PST	15
Posts available for promotion	15
Promoted through this order	15

55 x 20 = 110
75 = 35
15

S.No.	S.L.No	Name of Official	Present Place of posting	Name of School where adjusted	Remarks
1	29	Nusrat Parveen	GGPS Kandaro	GGHS Munda	A.V.P
2	50	Shahi Sultan	GGPS Ramyal	GGMS Kotkay (M)	A.V.P
3	57	Taskeen Begum	GGPS Soghalay	GGMS Banrgai (T)	A.V.P
4	78	Musrrat Nazir	GGPS Chakdara	GGMS Atto	A.V.P
5	88	Dilshad Begum	GGPS Qila Shamshi Khan	GGHS Shamshi Khan	A.V.P
6	93	Norul Haram	GGPS Thrari Badwan	GGHS Inzaro (D)	A.V.P
7	124	Mehar Sultan	GGPS Chat Pat	GGHS Sherkhani	A.V.P
8	149	Riasat Begum	GCMS Sehsada	GGHS Sherkhani	A.V.P
9	153	Qudsla	GGPS Diaroon	GGCMS Garah	A.V.P
10	176	Shamim Ara	GGPS Gur Gia	GGMS Tangi Dara	A.V.P
11	187	Shagufta Bibi	GGPS Khuni Dand No.1	GGMS Asigi	A.V.P
12	193	Raida Begum	GGPS Sabar Shah	GGMS Salegram	A.V.P
13	195	Majida Begum	GGPS Nasafa	GGMS Makhai	A.V.P
14	196	Nargas Begum	GGPS Soghalay	GGCMS Dehrai Talash	A.V.P
15	210	Parveen Begum	GGPS Sehsada #2	GGMS Shalfam	A.V.P

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Signature

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27.2 = 27
13.6 = 14
2.7 = 3
2.7 = 3
2.7 = 3
2.04

3. PROMOTION OF SDM/DM TO THE POST OF SST (General) BPS-16

Total No. of SST General (F) Posts vacant posts	73
25% Share Initial recruitment	18
75% share for Promotion	55
4% share of promotion of SDM/DM	03
Posts available for promotion	03
Promoted through this order	03

S.No	S.L.No	Name of Official	Present Place of posting	Name of School where adjusted	Remarks
1	4	Sabiha Naz	GGHS Thrai	GGMS Siyar Qalagai	A.V.P
2	5	Bibi Khatoon	GGHS Khanpur	GGMS Hanafia	A.V.P
3	7	Zakia Minhas	GGHS Sado	GGMS khungi	A.V.P

4. PROMOTION OF SAT/AT TO THE POST OF SST (General) BPS-16

Total No. of SST General (F) Posts vacant posts	73
25% Share Initial recruitment	18
75% share for Promotion	55
4% share of promotion of SAT/AT	03
Posts available for promotion	03
Promoted through this order	03

S.No	S.L.No	Name of Official	Present Place of posting	Name of School where adjusted	Remarks
1	1	Gulista Bibi	GGHS Khazana	GGHS Mian Kalay	A.V.P
2	2	Rashida Begum	GGHS Osakai	GGHS Nagrai (P)	A.V.P
3	4	Zeenat Begum	GGHS Nagrai (P)	GGHS Shalkandai	A.V.P

5. PROMOTION OF STT/TT TO THE POST OF SST (General) BPS-16

Total No. of SST General (F) Posts vacant posts	73
25% Share Initial recruitment	18
75% share for Promotion	55
4% share of promotion of STT/TT	03
Posts available for promotion	03
Promoted through this order	03

S.No	S.L.No	Name of Official	Present Place of posting	Name of School where adjusted	Remarks
1	2	Nishat Begum	GGHS Sado	GGMS Malakand (B)	A.V.P
2	5	Bibi Akhlaq	GGHS Munjai	GGHS Munjai	A.V.P
3	18	Farah Deeba	GGHS Kandaro	GGHS Dag Gosam	A.V.P

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PROMOTION OF S.Qari / Qari TO THE POST OF SST (General) BPS-16

Total No. of SST General (F) Posts -vacant posts					73
25% Share initial recruitment					18
75% share for Promotion					55
3% share of promotion of S.Qari/Qari					02
Rosts available for promotion					02
Promoted through this order					02
S.No	S.L.No	Name of Official	Present Place of posting	Name of School where adjusted	Remarks
1	1	Tanveer Akhtar	GGHSS Chakdara	GGMS Namaz Kot	A.V.P
2	7	Nigar Sultan	GGCMSS Timergara	GGMS Mandish	A.V.P

Terms and Conditions:

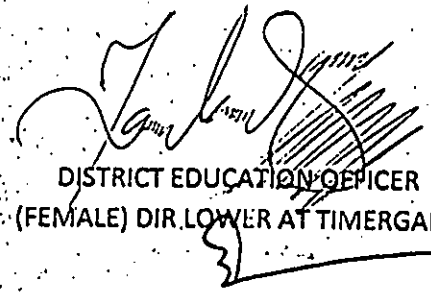
1. They would be on probation for a period of one year extendable for another one year.
2. they will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. Their service can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be preceded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their inter-Se-seniority on lower post will remain intact.
6. No TA/DA are allowed for joining his duty.
7. They will give an under taking to be recorded in their service book to the effect that if any over payment is made to him in light this order will be recovered and if she is wrongly promoted she will be reversed.
8. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
9. Their posting will be made on School based, they will have to serve at the place of posting, and their service is not transferable to any other station.
10. Before handing over charge once again their document may be checked if they have not the required relevant qualifications as per rules, they may not be handed over charge of the post.

(ZAIB UN NISA)
 DISTRICT EDUCATION OFFICER
 (FEMALE) DIR LOWER AT TIMERGARA

Endst: No. 3696-3702 / Dated Timergara the 01 / 11 / 20014.

Copy of the above is forwarded to:

1. PS to the Secretary to Govt. Khyber Pakhtunkhwa E&SE Department Peshawar.
2. PA to the Director E&SE Khyber Pakhtunkhwa Peshawar.
3. The District Accounts Officer Dir Lower at Timergara.
4. The Principals / Head Mistresses concerned.
5. The SDEO (F) Concerned.
6. The Officials Concerned.
7. M/File.


 DISTRICT EDUCATION OFFICER
 (FEMALE) DIR LOWER AT TIMERGARA



Directorate of Elementary and Secondary Education
 Khyber Pakhtunkhwa Peshawar
 PH No. 091-9210389, 9210938,
 9210437, 9210957, 9210468
 Fax 091-9210936
 E-mail rafiq_k851@yahoo.com



NTS Order

APPOINTMENT.

Consequent upon recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the post of Secondary School Teacher (SST General) School based in BPS-16 (Rs.10000-800-34000) @ Rs. 10000/- fixed plus usual allowances as admissible under the rules on adhoc basis on Contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with effect from the date of their taking over charge :-

Abbottabad					
SN	Name	Father Name	Address	Score	Name of School
1	Schrish Maqbool	Maqbool Ur Rehman	Village Sajikot Post Office Qalandarabad CNIC No 13101-0739809-0	150.2	GGMS Gali Meeran
2	Rabia Bibi	Muhamm ad Afsar	House Number 582 Lower Malik Pura Chittapul Abbottabad CNIC No 13101-8286599-6	139.7	GGMS Rahi
3	Rubina Yarnus	Abdul Qayyum	Muhammad Ashraf Cigarette Faorsh Kacheri Road Abbottabad CNIC No 13101-4354198-0	138.7	GGMS Kangar Bala
4	Sidra Bibi	Mujadda d Hussein Shaha	House No 310, Khola Khola CNIC No 13101-2801431-6	138.35	GGMS Kundi Battal
5	Iqra Bibi	Anwar Sutlan	Mohallah Barrian Bari Sheikh Ul Eandi Abbottabad District Abbottabad CNIC No 13101-2820074-6	133.95	GGMS Falak
Bannu					
S. No	Name	Father Name	Address	Score	Name of School
1	Necm Inam	Inam Khan	Riaz Electric Store Androon Mardan Gate CNIC No 11101-5996798-6	130.43	GGHS Fazal Sadiq Mandaw
2	Buchra Hanif	Muhamm ad Hanif	Mohallah Jhang House 462/C Bannu City CNIC No 11101-7808564-4	124.42	GGMS Kotka Daulat Khan
3	Fozia	Muhamm ad Ashraf	Jaman Road Jadia Abadi No 2 House No 161/L Bannu CNIC No 11101-9150032-4	129.89	GGMS Attaullah Mirian
4	Tanzeel Us Sana	Rais Ud Din	Mohallah Munshim House No 50/E Bannu City CNIC No 11101-8904963-6	129.6	GGHS Ayub Nurar
5	Asma Saif Ullah	Saadat Ullah Khan	Village Sokari Zabta Khan Tehsil And Distt Bannu CNIC No 11101-1402645-6	128.12	GGHS Jhangi Daul Shah
6	Naila Suman	Said Muhamm ad	House No 47/B Mohallah Rale Nawaz Railway Road CNIC No 11101-5448307-6	125.5	GGHS Mumtaz Barakzai
7	Sajida Bibi	Gul Zar Khan	Sikana Musa Khel Post Office Sikaner Khel Surani Bannu CNIC No 11101-9723241-4	128.05	GGMS Nur Shukurullah
8	Naveeda Ashraf	Muhamm ad Ibrahim	Kotka Ghurib Abad Mandan Post Office Khwaja Mad Mandan Bannu CNIC No 11101-6647323-0	127.8	GGMS Asparka Wazir

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Appointment Order SST (General) F Adhoc

(20/20)

5	Madaha Ghaffar Khan	Mohammed Irshad	House Number 7 Street Number 7 Abdullah Town Bara Kaku Islamabad CNIC No 61101-6552258-0	110.86	GGHS Matwani
6	Shazia Zaid	Zaid Ullah Khan	Govt Degree College Daggar Buner CNIC No 15101-3141231-2	110.04	GGHS s Kalpani
7	Raffat Anjum	Muhamm ad Shah Khan	Village Raga Muhallah Qayum Abad Near Buner Model School Raga CNIC No 15101-9818807-4	109.33	GGHS Topai
8	Saida Bibi	Noor Nabi Shah	Mazar Sharif Vill And P/O Pir Abab, Teh Gadezi Distt Buner, Mazar Sharif Pir Baba CNIC No 15101-1970114-2	107.75	GGHS Batanai
9	Bibi Parveen	Sangeen Khan	Village Makhrani Post Office Nawagai CNIC No 15101-9447009-0	105.4	GGHS Korya
10	Shaista Hassan	Syed Hassan	Village Dagai Moh Musa Khanil P/O Tota Lai Tehsuil Totalai Distt Buner Via Swabai CNIC No 35202-5147001-4	104.81	GGHS Dagai
12	Usra	Abdul Baqi	Village And Post Office Dirbaba Pacha Kalar Tehsil Gadezi Banner CNIC No 15101-3374102-6	101.87	GGHS Kowga
11	Shaheen	Nawat Khan	Village Kalpani Mohallah Bano Tehsil Gagna District Buner CNIC No 15101-3858892-4	101.86	GGHS Shadam
12	Nazish Ambreen	Musaddiq Ahmad Jan	C/O Manzoor Ul Hassan Banking Court-1 Qasla Road Tehsil Peshawar CNIC No 15101-9026013-2	99.14	GGHS Sura

Charsadda

S. No	Name	Father Name	Address	Score	Name of School
1	Sumaira Ehsan	Ehsan Ullah	Village Mamano Tehsil Tangi Post Office Sherpao CNIC No 17102-3547086-8	136.71	GGHS Doschra
2	Hajira	Anwar Shah	House No E/4 Street No 5 Canal Town Nasir Bagh Road CNIC No 17301-2600326-8	134.62	GGMS Sheikh Abad Nisatta
3	Zainab Bibi	Istikhar Ali	Village Tardher Post Office Shakh No 6 Tehsil Tangi District Charsadda CNIC No 13503-1967412-4	134.62	GGMS Station Killi Tangi
4	Shama Jannisar	Jannisar	District And Tehsil Charsadda Post Office Umerzai Village Purdil Abad CNIC No 17101-2738118-8	133.53	GGHS Shah Pasand Killi
5	Shehla Gul Shehzadi	Banaras Khan	Mohalla Khat Korrona Village And P.O Turangzai CNIC No 17101-7082299-2	133.22	GGMS Ajoon Killi
6	Aisha Sareer	Sareer Ullah	Khot Korrona Turangzai Tehsil And District Charsadda CNIC No 17101-6309804-2	128.69	GGHS Daulat Pura

Dir Lower

SN	Name	Father Name	Address	Score	Name of School
1	Sanya Begum	Shakir Ullah	Post Office And Village University Of Malakand Ramora Darbar District Lower Dir Tehsil Adenzai Chakdara CNIC No 15307-7762994-4	135.64	GGHS Kohatri
2	Yasmin Begum	Muhamm ad Shakoor	Aims And College Sakhatot Bazar Tehsil Dargai Sakhatot CNIC No 15401-0323624-4	128.22	GGHS Dantat
3	Faiza Rasheed	Abdur Rasheed	Nari Shah Ziarat Talush Der Lower Talush CNIC No 15302-2012842-2	125.68	GGHS Bagh (D)

Assistant Dist Officer
(E. & S.) Tangara
Distt Dir (L)

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Appointment Order SST (General) F Adhoc

4	Samina Samar	Bahadar Khan	C/O Bahadar Khan Set Se Ghiss Lal Qilla Po Kumber Distt Lower Dir CNIC No 15305-7704907-4	122.94	GGHS Manyal
5	Ziafat Bibi	Fazli Wahab	Vill And Po Mian Braugola Teh Adenzai CNIC No 15307-5989356-8	122.94	GGHS s Kumber
6	Decda Huma	Aman Ullah	Po Chakdara Mandai Dir Lower CNIC No 15307-0509625-6	122.61	GGHS Mian Kali
7	Sidra Begum	Muhib Ullah	Morad Cloth House Zaib City Centre Timergara Shop No 196-97 CNIC No 15306-4763626-6	122.6	GGHS Kadh
8	Maryam Bibi	Muhamm ad Rahman	Vill Soghalai Talash P/O Ziarat Talash Teh Temar Gara CNIC No 15302-6973501-4	121.59	GGMS Maskini
9	Walayat Bibi	Abdur Rashid	Village Sehsadda P/O Chakdara Tehsil Adenzai CNIC No 15307-6306459-2	121.59	GGHS Inzaro
10	Asma Nayab	Bakht Biland	Village Tharai Tehsil Timergara CNIC No 15302-7020250-6	120.18	GGMS Sadbar Kali
11	Rehana	Sabir Shah	Mohallah Bangla Saidan Vill And Post Office Tarnab Farm CNIC No 17301-7028812-8	118.78	GGHS Badin
12	Sarwat Begum	Ifrikhar Uddin	Village And Post Office Chakdara Gulmaqam Jafarabad Tehsil Adenzai CNIC No 15307-4527428-4	118.75	GGHS Zaimdara
13	Farhana Begum	Farhad Ullah	Farhana Begum D/O Farhad Ullah Village Rani Tehsil Balambat Dir Lower Post Office Rabat Timergara CNIC No 15302-5048195-8	117.17	GGHS Beyaria
14	Hijra	Fazal Qahar	Village Safaray Post Office And Tehsil Khall Dir Lower CNIC No 15401-7997554-4	116.1	GGHS Haya Serai
15	Aysha Begum	Taj Ul Nialook	Vill P/O Shountala Tehsi Samar Bagh Distt Dir Lower Kpk CNIC No 15303-4308550-6	115.78	GGHS Dantat
16	Ayishu Naqi	Nadcem Ullah Khan	Muslim Model School And College Shainshi Khan Talash Tehsil Timergara CNIC No 42101-8114487-2	114.77	GGHS Khall
17	Beenish	Dost Muhamun ad Khan	Post Office And Village Ouch Sharqi Tehsil Adenzai District Lower Dir CNIC No 15307-2123733-8	114.51	GGHS Beshgram

Dir Upper

S. No	Name	Father Name	Address	Score	Name of School
1	Azmeena Hafeez	Hafeez Muhamm ad Ishfaq	Haji Fareedon Main Bazar Dir District Upper Dir CNIC No 15701-3715703-0	125.83	GGHS Jan Bhatti
2	Safia Nilum	Sardaraz Khan	Shara Medical Centre Opposite To Dho Hospital Dir Upper CNIC No 15701-6064948-4	121.7	GGHS Sam Kot
3	Hafiza Abida Khanum	Nazir Ahmed	Village Cheragalli Post Office Bibiyawar District Upper Dir CNIC No 36501-6257617-6	119.27	GGHS Sundal
4	Laila Zaman	Gul Zaman Khan	Malik Medical Store Dir Upper CNIC No 15000-5221057-2	99.24	GGHS s Brawal

Hangu

S. No	Name	Father Name	Address	Score	Name of School
1	Afshan Bangash	Hameed Hussain	Po Box No 27 House No D-5 Cpc Colony Paec Dg Khan CNIC No 17301-9703258-2	137.03	GGMS Kahi
2	Hussan Bano	Hanif Glulam	Mohallah Malik Abad Hangu Eld Gah Road Hangu CNIC No 14101-8007193-2	124.6	GGMS Ali Abad

17x3=51

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Appointment Order SST (General) F Adhoc

7. Pay will not be drawn until and unless a certificate to the effect by DEO(concerned) is issued that his/her certificates are verified
8. He/She should join his post within 10 days of the issuance of this notification. In case of failure to join the post within 10 days of the issuance of this notification, his/her appointment will expire automatically and no subsequent appeal etc shall be entertained.
9. Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
10. He/she will be governed by such rules and regulations as may be issued from time to time by the Govt.
11. His/her services shall be terminated at any time, in case his performance is found unsatisfactory during his/her contract period. In case of misconduct, he/she shall be proceeded under the rules framed from time to time.
12. His/her appointment is made on School based, He/she will have to serve at the place of posting, and His/her service is not transferable to any other station.
13. Before handing over charge once again their document may be checked if they have not the required relevant qualifications as per rules they may not be handed over charge.

(Muhammad Rafiq Khattak)

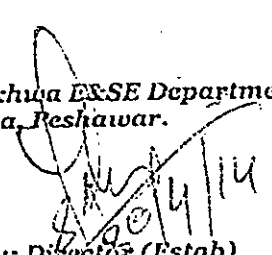
Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

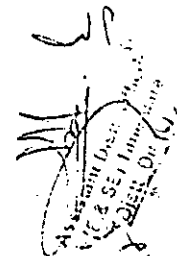
2608-15


Endst: No. / File No.2/A-14/SST/Adhoc/Apptt: Dated Peshawar the 30/04/2014.

Copy forwarded for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Secretary Khyber Pakhtunkhwa Public Service Commission Peshawar.
3. District Education Officers Concerned
4. District Accounts Officer Concerned
5. Official Concerned.
6. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
7. PA to the Director E&SE Khyber Pakhtunkhwa Peshawar.
8. M/File


Dy: Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar




ATTESTED

(24) (24)

Ahntwae D



OFFICE OF THE
DISTRICT EDUCATION OFFICER
(F) DISTRICT DIR LOWER

Tel: 0945-9250081
0945-9250083

Office Order

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Govt: of Khyber Pakhtunkhwa E&SE Department Notification No. SO (B&A)/ 1-18/ E&SE/ 2012 Dated 11/07/2012 and Finance Department Endorsement No. SO (FR)/ FD/ 10-22 (F)/ 2010 Dated 16-07-2012, the following Qari (Female Teachers) B-12 are hereby promoted to the post of Senior Qari (Female Teachers) B-15 (8500-700-29500) 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 in mediate effect.

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②

③

S.No	S.L.No	Name of Teacher	Name of School
1	1	Tanweer Akhter	GGHSS Chakdara B.ed. ✓
2	2	Jamila Bibi	GGHSS Ouch x
3	3	Nazash Bibi	GGHSS Rabat x
4	4	Shah Parveen	GGHS Sado x
5	5	Sehat Sultan	GGHSS Mayar x
6	7	Nigar Sultan	GGCMS Timergara B.ed ✓
7	8	Nasreen Iqbal	GGHSS Ziarat Talash ✓ B.ed
8	9	Shazia Begum	GGHS Tharai
9	10	Bushra Begum	GGHS Kandaro
10	11	Samina Begum	GGHS Badwan
11	12	Samina Rasool	GGHS Osakai
12	13	Shaista Begum	GGHSS Kumbar
13	16	Seemi Naz	GGHS Kityari

Is-1

Is-1

Terms and Conditions:-

1. They would be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. Their services can be terminated at any time, in case his/her performance is found unsatisfactory during probationary period. In case of misconduct, he/she shall be preceded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their Inter-Se-seniority on lower post will remain intact.
6. They will give an under taking to be recorded in their service book to the effect that if any over payment is made to him/her in light of this order will be recovered and if he/she is wrongly promoted he/she will be reversed.
7. No TA/DA is allowed for joining his/her duty.

(Sabira Parveen)
District Education Officer
(F) District Dir Lower.

Encls: No. 60-64

Date: Timergara the 29/7/2013

Copy forwarded for information and necessary action to the:-

1. District Account Officer District Dir Lower.
2. Principals/ Headmistresses Concerned.
3. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
4. Officials Concerned.
5. M/File.

District Education Officer
(F) District Dir Lower.

AT-60000

25 25
order copy - II.

District Education Officer (F) Dir Lower at Timergara.

Ahmed E

PH No. 0945-9250083,

E-mail emideofdirlower@yahoo.com

OFFICE ORDER:

Consequent upon the Notification issued by the Director (E&SE) Khyber Pakhtun Khwa Peshawar Endst. No. 867/File No.2/Promtion SST B-16 dated Peshawar the 02/12/2014. The following SCTs/CTs, SDMS/DMS, SATs/ATs, STTs/TTs, S.Qaris/Qaris and PSHTs/SPSTs/PSTs are hereby adjusted against the vacant posts of SST (Bio-Chem), SST (Maths-Phy), SST (Gen) school based at the schools noted against each in the intrest of public service with immediate effect. Terms and conditions will remain the same as mentioned in the notification refered above.

B. SST (General)

1. Promotion of SCTs/CTs to the post of SST (General) BPS-16

NIL
BPS-15

S#	S.L.No	Name of Official	Present place of posting	School where adjusted	Remarks
1	14	Sultanat Begum	GGMS Sarai Bala	GGMS Baroon	A.V.P
2	26	Zakia	GGHS Munda	GGHS Munda	A.V.P
3	41	Naheed Begum	GGHS Nagrai (P)	GGHS Shalkandai	A.V.P
4	42	Zakia	GGHSS Ziarat Talash	GGCMS Bazarak	A.V.P
5	44	Samia Begum	GGHS Nagrai (P)	GGMS Darmal (P)	A.V.P
6	46	Hurmat Bibi	GGHS khadagzai	GGHS Beyarai	A.V.P

2. Promotion of PSHTs/SPSTs/PSTs to the post of SST (General) BPS-16

S#	S.L.No	Name of Official	Present place of posting	School where adjusted	Remarks
1	212	Mahliya	GGPS Gabagai Timergara	GGMS Siyar Qilagai	A.V.P
2	245	Niaz Mand	GGPS Anderay	GGHS Koherai	A.V.P
3	246	Dil Sehat Begum	GGPS Goro Talash	GGMS Shalfalam	A.V.P
4	251	Farah Naz	GGPS Safrona	GGMS Nari tangai	A.V.P

3. Promotion of SDMS/DMS to the post of SST (General) BPS-16

S#	S.L.No	Name of Official	Present place of posting	School where adjusted	Remarks
1	9	Nasreen Begum	GGHS Sado	GGHS Ranai	A.V.P

4. Promotion of SATs/ATs to the post of SST (General) BPS-16

S#	S.L.No	Name of Official	Present place of posting	School where adjusted	Remarks
1	9	Hidai Begum	GGMS Bandagai (T)	GGMS Darmal Bala	A.V.P

Intikhab Photo State
Near National Bank Colony,
Moulat Chowk, Timergara.
Tel: 822994, Mob: 0300-9398707

[Signature]

ITL/ED

3. Promotion of STTs/TTs to the post of SST (General) BPS-16

S#	S.L.No	Name of Official	Present place of posting	School where adjusted	Remarks
1	2	Nishat Begum	GGHS Osakai	GGHS Sherkhani	A.V.P

(Zaib Un Nisa)
District Education Officer (F)
District Dir Lower

Endst. No. 45-15-60 /

Dated Timergara the 13 /12/2014

Copy of the above is forwarded to:

1. The Director (E&SE) Khuber Pakhtoon Khwa Peshawar.
2. The District Accounts Officer Dir Lower.
3. The Principals / Head Mistresses of the institute concernd.
4. The Deputy District Education Officer (F) Dir Lower.
5. The Offcails concernd.
6. M/File.


District Education Officer (F)
District Dir Lower

Alstikhab Photo State
National Bank Colony,
Chowk, Timergara.
Tel: 822994, Mob: 0300-9398707


ATTESTED

گورنمنٹ سروس ڈی ای او (زبان) ڈیپارٹمنٹ

دفعہ 14 برائے ایس ایس ٹی (SST) کے لیے DPC

صاف عالی

موجودہ گزٹ میں 13 روزوں کی مدت پر مشتمل ہے۔
 اور حکم نامہ کے تحت آرڈر میں 2 الفاظی کیے گئے۔ اور کچھ سیریوں سے شروع کر دی گئی
 اور باقی کے خلاف تعینات کیا گیا۔ یہی آرڈر کی تفصیل درج ذیل ہے۔

سر سٹیج 55 میں سے لی گئی - حالتہ الیک (29)	C.T 40% = 29.3
	= 27
مطابق اس سٹیج پر روزوں کی ضرورت ہے۔	PST 20% = 14.6 = 15
اور جاری اساتذہ زیادہ ضرورت ہے۔	= 13
(NTS میں 17 کی appointments ہو چکی ہے۔ اور	DM, AT, TT 4% = 2.9 = 3
آرڈر میں 18 لکھی ہے۔	Qari 3% = 2.2 = 2

دوسری آرڈر نمبر 867 (13.12.2014) میں 13 روزوں کی ضرورت ہے۔
 حالتہ NTS کو (SS=46) مشتمل کیا ہے۔ جو 48 سٹیج پر روزوں کی ضرورت ہے
 اس میں 13 روزوں کی تفصیل اور منطقیان درج ذیل ہے

(بیان پر 7 روزوں کی ضرورت تھی) (6)	C.T 40% = 6.93
(بیان پر 3 روزوں کی ضرورت تھی) (4)	PST 20% = 3.46
(1)	DM 4% = 0.69
(1)	AT 4% = 0.69
(1)	TT 4% = 0.69
(7) (قائم کو نظر انداز کیا گیا -)	Qari 3% = 0.52 X

(ظاہر ہے کہ سے بوائے زیادہ ہیں)
 دونوں آرڈر ساتھ لکھی ہیں۔
 لہذا عرض ہے کہ ان تمام سیریوں کی ضرورت پر غور کر کے کچھ سیرا حق دیا جائے۔

الحارم
 ڈی ای او (زبان) ڈیپارٹمنٹ
 ڈی ای او (زبان) ڈیپارٹمنٹ

(Signature)
 11/11/2014

WAKALAT NAMA

BEFORE THE COURT OF Chairman Service Tribunal K.P.K.

No. _____ of 2015

MST. Nasreen Iqbal Senio & Qaria, (Petitioner)
Government Girls Higher Secondary (Appellant)
School,

VERSUS

Government of K.P.K through (Respondent)

We MST. Nasreen Iqbal

In the above noted Service do hereby appoint

and constitute **Mr. Saifullah Mohmand** Advocate as my/ our Counsel in the subject proceedings and authorize him to appear, plead etc compromise, withdraw or refer the matter for arbitration for me/ us without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel at our/my expense and receive all sums and amounts payable to us/ me and to all such acts which he may deem necessary for protecting my/ our interest in the matter. He is also authorized to file Appeal, Revision, Application for restoration or application for setting asiding exparte decree proceedings on my/ our behalf.

Dated: - 03/04/2015


(SAIFULLAH MOHMAND)
Advocate, High Court, Peshawar.


(Client)

نسرین اقبال سنو

Office Address: - B-107, Town Tower
Jahangir Abad, University Road,
Peshawar.

Cell No: - 0321-9117280



OFFICE OF THE
DISTRICT EDUCATION OFFICER (Female)
DISTRICT DIR, LOWER,

Tel: 0945-9250083

Email: emisdeofdirower@yahoo.com

No 6971/1

Dated: 05/12/2015

To

The Honorable Service Tribunal
Khyber Pakhtunkhwa Peshawar (Swat).
Service Appeal No.356/2015. Mst. Nasreen Iqbal S/Qaria

Subject:- **APPLICATION FOR REJECTION/DISMISSAL.**

Memo:-

Respectfully Sheweth:-

1. That the above title appeal is pending before already tribunal with is fixed for date 07-12-2015.
2. That the grievances of the appellant have been re-addressed by the department through order dated 31-07-2015 where by revised she was promoted and adjusted on regular basis.
3. That no useful purpose would be served if the appeal is kept pending.
4. It is requested that the appeal may be dismissed/rejected.


District Education Officer (F)
Dir Lower at Timergara.



BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO. 356/2014.

37

Ms. Nasreen Iqbal Sr.Qaria B-16 GGSS Ziarat Talash District Dir Lower.

.....Appellant

VERSUS

1. Govt of Khyber Pakhtunkhwa through Secretary, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
2. Director, Elementary and Secretary Education Khyber Pakhtunkhwa Peshawar.
3. District Education Officer (Female) Dir lower.

.....Respondents

PARA WISE COMMENTS/REPLY FOR AND ON BEHALF OF THE RESPONDENTS NO 1, 2 & 3.

Respectfully Sheweth:-

Preliminary Objections:-

1. The appellant has got no locus standi or cause of action to file the instant appeal.
2. The instant appeal is badly time barred.
3. The instant service appeal is based on malafide intention for gaining illegal and unauthorized service benefits from the Respondents.
4. The appellant has concealed the material fact, from this Hon! Able Tribunal, hence liable to be dismissed.
5. The appellant has not approached this Honorable Tribunal with clean hands.
6. The present appeal is liable to be dismissed for mis-joinder of unnecessary and non-joinder of necessary parties.
7. The instant appeal is against the prevailing laws & rules.
8. The appellant has rightly been treated by respondent No.3

ON FACTS.

Respectfully Sheweth.

1. Its relates the appellant hence needs no comments.
2. As pertain to record.
3. Pertains to record, as the promotion of the Secondary school teachers BPS-16 (S.Qaria) was made through seniority cum-fitness basis and as per selection/Promotion through government policy.
4. Correct up to the extent of promotion and appointment through NTS but it is incorrect that she was eligible at the time of promotion.
5. Incorrect. As explained by the appellant that two senior most teachers were promoted, but the appellant was junior to then was not promoted as per government selection/promotion policy. The promotion was made through seniority cum fitness basis.
6. As explained in para-5 that 13 female teachers were promoted as per policy of selection/promotion i.e. 75% by promotion and 25% by initial recruitment. Out of which 04 post of female teachers are going to be filled in by way of initial recruitment through NTS.
7. Incorrect the appellant was not eligible for promotion at that time, as she was most junior to other senior most teachers now she has been promoted, vide office order issued under No. 3967-72 Dated, 31/07/2015, copy of the relevant office order is attached (Annex-A) so at this stage, the request of the

appellant has been succeeded. Hence instant appeal become infraction and is liable to be dismissed.

8. Incorrect: The Departmental appeal of the appellant has been dismissed as no plausible proofs produced by her to the committee.
9. Incorrect. The respondent has followed the prescribed policy in the true spirit.

ON GROUNDS:-

- (A) Incorrect. The orders are legal lawful and according to the policy.
- (B) Incorrect: per government selection/promotion policy and in light of the notification issued by the provincial government 25% posts by initial recruitment and 75% posts of teachers are to be filled by promotion. Under the said policy Total 13 female teachers were promoted and 04 (SST) posts are going to be filled in by way of initial recruitment through NTS .
- (C) Incorrect: as explained is para B above and as per seniority list of teachers, the appellant was not on the top of Qualified and eligible so at this stage the appeal of the appellant is not justified.
- (D) Incorrect: the details brief has been explained in para B above.
- (E) Incorrect and denied. As explained above.
- (F) Incorrect: As replied above.
- (G) Incorrect: As replied above.
- (H) Incorrect: She has been given her right on merit as been promoted, vide office order issued under No. 3967-72 dated 31/07/2015.
- (I) Incorrect: As she was not eligible for promotion at that time, as she explained by here vide para-5 that she was most junior to the two senior most female teacher who were promoted.
- (J) It is just in repetition of above paras. As explained in para I above.
- (K) The respondents also seek permission to raise additional grounds at the time of argument. As explained above, the appellant has been promoted and at that time the appellant was not eligible for promotion as she was junior to others senior female promoted teachers.

In view of the above made submission, it is humbly requested that this Honorable Tribunal may very graciously be pleased to dismiss the instant appeal with cost in favor of the respondents Department.



Director,

ELEMENTARY AND SECONDARY EDUCATION
KHYBER PAKHTUNKHWA, PESHAWAR
(Respondent No.2)


SECRETARY,

ELEMENTARY AND SECONDARY EDUCATION
KHYBER PAKHTUNKHWA, PESHAWAR
(Respondent No.1)


DISTRICT EDUCATION OFFICER (F)
DIR/LOWER AT TIMERGARA
(Respondent No.3)


Secretary
Estab: Department

سرکار پاکستان

مقامی حکومتیں اور دیگر اداروں کو
مختص کردہ فنڈز کی تفصیلات کے بارے میں
معلومات فراہم کرنے کے لیے درخواست

یہ ہے۔

(3) یہاں مذکورہ بالا تمام تفصیلات
مختص کردہ فنڈز کی تفصیلات کے بارے میں
معلومات فراہم کرنے کے لیے درخواست

مختص کردہ فنڈز کی تفصیلات کے بارے میں

معلومات فراہم کرنے کے لیے درخواست

(4) یہاں مذکورہ بالا تمام تفصیلات
مختص کردہ فنڈز کی تفصیلات کے بارے میں
معلومات فراہم کرنے کے لیے درخواست

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مختص کردہ فنڈز کی تفصیلات کے بارے میں



Annex A

District Education Officer (F) Dir Lower at Timergara.

PH No. 0945-9250083,

E-mail emisdeofdirlower@yahoo.com

OFFICE ORDER:

Consequent upon the Notification issued by the Director (E&SE) Khyber Pakhtun Khwa Peshawar Endst. No. 4558-64/File No.2/Promtion SST B-16 dated Peshawar the 22/07/2015. The following SCTs/CTs, SDMs/DMs, SATs/ATs, STTs/TTs, S.Qaris/Qaris and PSHTs/SPSTs/PSTs are hereby adjusted against the vacant posts of SST (Bio-Chem), SST (Maths-Phy), SST (Gen) school based at the schools noted against each BPS-16 (10000-800-34000) plus usual allowncese under the rules on regular basis, in the intrest of public service with immediate effect. Terms and conditions will remain the same as mentioned in the notification refered above.

B. SST (General)

1. Promotion of SCTs/CTs to the post of SST (General) BPS-16

S#	S.L.No	Name of Offical	Present place of posting	School where adjusted	Remarks
1	14	Shazia Bibi	GGHS Khall	GGHS Khall	A.V.P
2	15	Samia Begum	GGHS Nagri (P)	GGCMS Bazarak	A.V.P
3	17	Jamila Nargas	GGHS Badin	GGMS Dheri Kambat	A.V.P
4	18	Ulfat Naz	GGHS Hayaserai	GGHS Hayaserai	A.V.P
5	19	Samina Naz	GGHSS Ouch	GGHS Kadh	A.V.P
6	21	Shafqat Bibi	GGHSS Chakdara	Darmal (P)	A.V.P
7	23	Pukraj Begum	GGCMHSS Timergara	GGMS Daro (M)	A.V.P
8	25	Zeenat Maqbool	GGHS Odigram	GGMS Rehanpur	A.V.P
9	26	Nusrat Begum	GGHS Hayaserai	GGHS Sherkhanai	A.V.P
10	27	Shahnila Bibi	GGHS Khazana	GGHS Kotkai (P)	A.V.P

2. Promotion of PSHTs/SPSTs/PSTs to the post of SST (General) BPS-16

S#	S.L.No	Name of Offical	Present place of posting	School where adjusted	Remarks
1	2	Shamim Akhtar	GGPS Badin	GGHSS Samar Bagh	A.V.P
2	255	Safia Begum	GGPS Dherai Chakdara	GGMS Safary (M)	A.V.P
3	266	Zakia Bibi	GGPS Musa Abad	GGHSS Mian Kalay	A.V.P
4	274	Nishat Begum	GGPS Shaitai No.2	GGHS Malakand	A.V.P
5	275	Nagina Bibi	GGPS Timergara No.1	GGMS Mandish	A.V.P

3. Promotion of SDMs/DMS to the post of SST (General) BPS-16

S#	S.L.No	Name of Official	Present place of posting	School where adjusted	Remarks
1	1	Hussan Ara	GGHS Ramora	GGMS Barkhanai	A.V.P

4. Promotion of SATs/ATs to the post of SST (General) BPS-16

S#	S.L.No	Name of Official	Present place of posting	School where adjusted	Remarks
1	5	Hadia Bibi	GGMS Bandagai (T)	GGCMS Moranai	A.V.P

5. Promotion of STTs/TTs to the post of SST (General) BPS-16

S#	S.L.No	Name of Official	Present place of posting	School where adjusted	Remarks
1	2	Nishat Begum	GGHS Saddo	GGMS Markhanai (M)	A.V.P

6. Promtion of S.Qaris/Qaris to the post of SST (G) B-16

S#	S.L.No	Name of Official	Present place of posting	School where adjusted	Remarks
1	6	Nasreen Iqbal	GGHSS Ziarat Talash	GGMS Hanfia	A.V.P

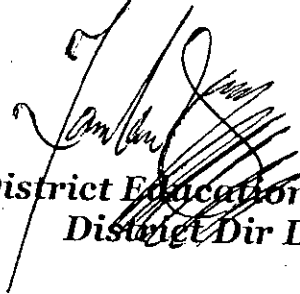
(Zaib Un Nisa)
District Education Officer (F)
District Dir Lower

Endst. No. 3967-72 /

Dated Timergara the 31 /07/2015

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District Education Officer (F)
District Dir Lower



OFFICE OF THE
DISTRICT EDUCATION OFFICER (Female)
DISTRICT DIR LOWER

Tel: 0945-9250083
Email: emisdeofdirower@yahoo.com

No 6971/1

Dated: 05/12/2015

To

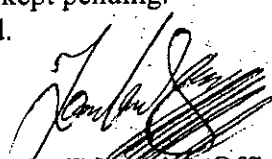
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