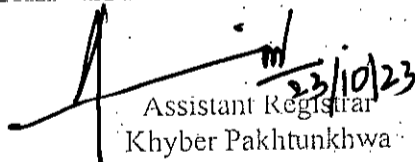


Cost of Rs. 20,000/- received in Service Appeal No: 772/23

Titled Shaheen Akhtar VS Education

in the office of Assistant Registrar, Vide Order 04/09/23, Submitted Dated: 23/10/2023


Assistant Registrar
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal # 772/2023

Mst, Shaheen Akthar EX- HM (BPS-17).....APPELLANT.

VERSUS

GOVT: OF KHYBER PAKHTUNKHWA & OTHERS.....RESPONDENTS.

I N D E X

S#	Description of Documents	Annex	Pages
1	Affidavit	A	1
2	Authority Letter	B	2
3	Para-wise comments/reply	C	3-4
4	Annexures	D	5-13



Despondent

C

BEFORE THE HON'BLE SERVICE TRIBUNAL PESHAWAR

Service Appeal # 772/2023

Mst, Shaheen Akhtar EX-HM (BPS-17).....Appellant

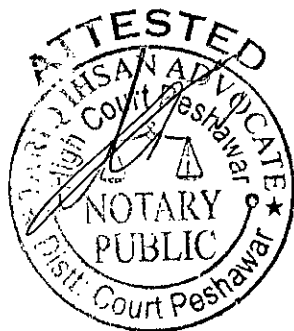
VERSUS

Govt. of Khyber Pakhtunkhwa & others..... Respondents

AFFIDAVIT

I, Mr. Amjad Ali, Section Officer (Litigation-II) Elementary & Secondary Education, Department do hereby solemnly affirm and declare that the contents of the accompanying para-wise comments, submitted by the respondents, are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

It is further, stated on oath that in this appeal the answering Respondents have neither been placed ex-parte nor has their defense been struck off. /cost.



DEPONENT

A handwritten signature in black ink, appearing to be "Amjad Ali".

Mr. Amjad Ali
Section Officer (Lit-II)
E&SE Department Peshawar



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Block "A" Civil Secretariat, Peshawar

Phone No. 091-9211128

AUTHORITY LETTER

It is certified that **Mr. Fahim Ullah, Legal Representative (Litigation-II)** Elementary & Secondary Education Department, Govt: of Khyber Pakhtunkhwa, Peshawar is hereby authorized to submit parawise comments on behalf of Secretary Elementary & Secondary Education Department Peshawar in Service Appeal No. 772/2023 Case Titled Mst. Shaheen Akthar Ex-Head Mistress (HM-BS-17) vs Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar.

Mr. Amjad Ali
Section Officer (Lit-II)
E&SE Department Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

In Service Appeal No. 772/2023

Mst. Shaheen Akhtar, Ex-HM.....Appellant.

VERSUS

Chief Secretary to Govt of KPK Peshawar..... Respondents.

PARAWISE COMMENTS ON BEHALF OF THE RESPONDENTS NOS. 1 TO 4

Respectfully Sheweth,

Preliminary Objections:

1. The appellant has not come to this Honorable Tribunal with clean hands.
2. The appellant is not an aggrieved person nor has any locus standi to file the present appeal.
3. That the appellant has concealed material facts from this Honorable Tribunal.
4. That the appellant is estopped by her own conduct to file the present appeal.
5. That the present appeal is against the prevailing law and rules.
6. That the appellant is not entitled for any relief, she has sought from this Honorable Tribunal.
7. That the present appeal is liable to be dismissed being devoid of any merits.
8. That the present appeal is barred by law and limitation.
9. That the appellant has not challenged of the order dated 14-11-2022 in the heading of appeal as well as in prayers of appeal, therefore the appeal is liable to be dismissed.

On Facts

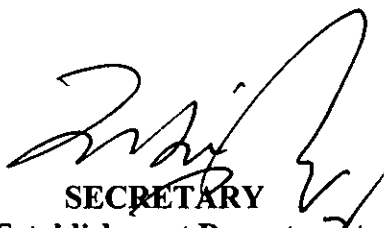
1. Pertains to the legal draft of Constitution of Islamic Republic of Pakistan 1973.
2. Pertains to the legal draft of Constitution of Islamic Republic of Pakistan 1973.
3. Pertains to record, hence no comments.
4. Pertains to record, hence no comments.
5. Pertains to record, hence no comments.
6. Incorrect. The promotion of every civil servant is discretion of Provincial Selection Board and in the case of the present appellant no PSB meeting has been held yet. In fact the appellant got retired just before PSB meeting on 18-02-2023 on completion of 60 years i.e on superannuation period through notification dated 14-11-2022.
7. Incorrect. The appellant is not an aggrieved person, therefore, the present appeal alongwith grounds of appeal is liable to be dismissed.

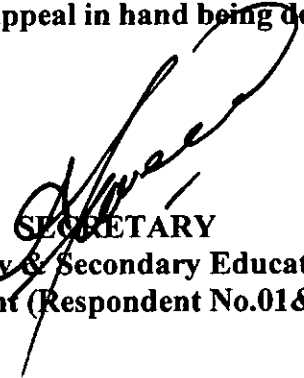
3


On Grounds:

- A. Incorrect hence denied. The appellant has not come to this Honorable Tribunal with clean hands.
- B. Incorrect and baseless, hence denied.
- C. Incorrect hence denied. The appellant stood retired on 18-02-2023 just before PSB meeting hence is not entitled to any relief allegedly sought from this Honorable Tribunal.
- D. Incorrect and not applicable in the present appeal, hence denied.
- E. Incorrect, the respondents have acted in accordance with law. The appellant has no right for promotion after retirement.
- F. Para-F to the extent of this appeal is inapplicable and irrelevant hence denied.
- G. Incorrect the respondents have acted in accordance with law and rules hence nothing unlawful in it.
- H. Respondents seeks further grounds at the time of arguments.

It is therefore, most humbly requested that the appeal in hand being devoid of merit may kindly be dismissed with cost.


SECRETARY
Establishment Department
(Respondent No.03)


SECRETARY
Elementary & Secondary Education,
Department (Respondent No.01&02)


DIRECTOR
Elementary & Secondary Education
Peshawar (Respondent No.04)

Annexure E (5)
21

GOVERNMENT OF N.W.F.P.
SCHOOLS & LITERACY DEPARTMENT

Dated Peshawar the 01-03-2008.

NOTIFICATION.

No. SO(S) 1-4/2008/ Promotion BS-16 to BS-17 H.M. on Regular Basis. On recommendation of the Departmental Promotion Committee, the Competent Authority has been pleased to promote the following SETs (BPS-16) to the rank of Headmistress (BS-17) on regular basis with immediate effect:

Sl. No.	Name	Sl. No.	Name	Sl. No.	Name	Sl. No.	Name	Sl. No.	Name
1-	Mst:Tassadaq Ara	2-	Mst: Akhtar-Un-Nisa	3-	Tahira Begum	4-	Razia Begum	5-	Pukraj Gul
6-	Shoukhat Rahim Shah Hikmat Bibi	7-	Razia Begum	8-	Zuhil Begum	9-	Nizakat Begum	10-	Saeeda Parveen
11-		12-	Saeeda Anjum	13-	Hazrat Jan Jadoon	14-	Shamim Akhtar	15-	Nasira Parveen
16-	Munawar Sultana	17-	Farhat Sultana Shahnaz	18-	Javed Iqbal	19-	Ume Khalida	20-	Fakrun Nisa
21-	Bibi Attiya	22-	Hamida Bibi	23-	Tahira Jabeen	24-	Zeenat Sama	25-	Ismat Ara
26-	Noor Jehan Begum	27-	Bashir-Un-Nisa	28-	Shamim Akhtar	29-	Shamim Akhtar	30-	Rahat Jabeen
31-	Tahira Naz	32-	Kausar Parveen	33-	Gul Shahida	34-	Shakeela Begum	35-	Dure Javedain
36-	Khurshid Begum	37-	Gohar Sani	38-	Hurmat Shaheen	39-	Noor Jehan	40-	Duri Shahwal
41-	Gul Naz	42-	Nighat Saba	43-	Sadiq Jan	44-	Rehana Samar	45-	Jehan Tab
46-	Sultanat Nasreen	47-	Nusrat Nazir	48-	Khalida Parveen	49-	Waheeda Kausar	50-	Shahida Nasreen
51-	Shahnaz Hameed	52-	Farhat Nasreen	53-	'Naheed' Begum	54-	Muhammadia	55-	Bibi Arifa
56-	Roshan Nisa	57-	Mukhtiar Begum	58-	Hamida Bano	59-	Rajoon Mahommd	60-	Shahnaz Sarwar
61-	Rifat Ysamin	62-	Nasreen Azra	63-	Zaitoon Bibi	63-	Iqbal Begum	65-	Mumtaz Begum
66-	Kiram Begum	67-	Akhtar Batool	68-	Nuzhat Akhtar	69-	Abida Nasreen	70-	Taj Bibi
71-	Azra Shaheen	72-	Saeeda Akhtar	73-	Rasheeda Begum	74-	Suriya Begum	75-	Chand Bibi
76-	Samina Rohi	77-	Shoukat Gul	78-	Nasreen Begum	79-	Shamim Akhtar	80-	Mubarak Zeba
81-	Nusrat Tehseen	82-	Aisha Ghafoor	83-	Nelofar Qazi	84-	Gulshan Afroz	85-	Shafakat Bibi
86-	Samina Jehan	87-	Maryam Begum	88-	Yasmin Begum	89-	Shaheen Akhtar	90-	Bibi Zainab
91-	Shaista	92-	Rehana Shaheen	93-	Bakht Sargan	94-	Rozina Bibi	95-	Nighat Shammim
96-	Nighat Akhtar	97-	Khurshid Begum	98-	Farzana Shaheen	99-	Musarat Jabeen	100-	Memoona Kausar
101	Bilquis Bibi	102	Farhat Iqbal	103	Robina Afza	104	Saeeda Begum	105	Ishrat Nigha
106	Afsar Jan	107	Nighat Yasmin	108	Shakila Begum	109	Sajida Nasreen	110	Dilawar Jan
111	Hamida Bano								

On their promotion as Headmistress on regular basis the following posting/transfer are here by issued in the public interest.

S.No	Name & Address of the Officers.	As Proposed.	Remarks.
1-	Mst: Tassadaq Ara, SET, (BS-16) Incharge Instructor, (BS-17) RITE (F) Abbottabad.	Instructor (BS-17) RITE (Female) Abbottabad.	Against the post already occupied by her, in higher scale BS-17.
2-	Mst: Akhtar-Un-Nisa, SET, (BS-16) Incharge H/M (BS-17) GGHS Sirya, Haripur.	H/Mistress (BS-17) GGHS Sirya, Haripur.	--do--
3-	Mst: Tahira Begum, SET (BS-16) Incharge H/M (BS-17) GGHS Aza Khel Payan Nowshera.	H/Mistress (BS-17) GGHS Aza Khel Payan Nowshera	--do--

ATTESTED

Section Officer
Dep't: Schools & Literacy
Peshawar

	Mst: Nasreen, SET (BS-16) GGHS Koti Bannu.	Headmistress (BS-17) GGHS Abdul Ghaffar Muhammad Khel Bannu.	Against Vacant Post.
	Mst: Taj Bibi SET (BS-16) GGHS No.2 Abbottabad.	Headmistress (BS-17) GGHS Beringali Abbottabad. She stand retired from service w.e.f 13-12-2007 her promotion will be considered from the date DPC meeting dated 6-12-2007.	Against Vacant Post. (Notional Promotion from the date of DPC).
71-	Mst: Azra Shaheen, SET (BS-16) Incharge H/M (BS-17) GGHS Bandi Attia Khan Abbottabad.	Headmistress (BS-17) GGHS Bandi Attia Khan Abbottabad.	Against the post already occupied by her in higher BS-17
72-	Mst: Saceda Akhtar, SET (BS-16) GGMS Pharala Haripur.	Headmistress (BS-17) GGHS Dobandi Haripur.	Against Vacant Post
73-	Mst: Rashida Begum, SET (BS-16) GGMS Khawari Manshra.	Headmistress (BS-17) GGHS Darband Manshra.	Against Vacant Post
74-	Mst: Surriya Begum SET (BS-16) GGMS Rayela Abbottabad.	Headmistress (BS-17) GGHS Behali Manshra.	Against Vacant Post
75-	Mst: Chand Bibi, SET (BS-16) GGHS Dhamtor Abbottabad.	Headmistress (BS-17) GGHS Kohthiala Abbottabad.	Against Vacant Post
76-	Mst: Samina Rohi, SET (BS-16) GGMS Garhi Kaka Khel Charsadda.	DDO (BS-17) (F) S&L Tangi Charsadda.	Against Vacant Post
77-	Mst: Shoukat Gul, SET (BS-16) GGCMHS Charsadda.	Headmistress (BS-17) GGHS Sheikh Kali Charsadda.	Against Vacant Post
78-	Mst: Nasreen Begum, SET (BS-16) GGHS Chooi Haripur.	Headmistress (BS-17) GGHS Chooi Haripur.	Against Vacant Post
79-	Mst: Shamim Akhtar, SET (BS-16) GGHS Pabbi Nowshera.	Headmistress (BS-17) GGHS Jolazai Nowshera.	Against Vacant Post
80-	Mst: Mubarak Zeba, SET (BS-16) GGMS Koda Khel Charsadda.	Headmistress (BS-17) GGHS Tordher Swabi.	Against Vacant Post
81-	Mst: Nasrat Tehseen, SET (BS-16) GGMS Kacha Mali Khel D.I. Khan.	Headmistress (BS-17) GGHS Akhundana Mama Khel Bannu.	Against Vacant Post
82-	Mst: Aisha Ghafoor, SET (BS-16) GGHS Gul Bandi Swat.	Headmistress (BS-17) GGHS Chail Shahgai, Swat.	Against Vacant Post
83-	Mst: Neelofar Qazi, SET (BS-16) GGHS No.1 Haripur.	Headmistress (BS-17) GGHS Kalabat Town Ship No.1 Haripur.	Against Vacant Post
84-	Mst: Gulshan Afroz, SET (BS-16) GGHS Behari Colony D.I. Khan.	Headmistress (BS-17) GGHS Ismail Khel Bannu.	Against Vacant Post
85-	Mst: Shafiqat Bibi, SET (BS-16) JICA Modal School Fatima Mardan.	Headmistress (BS-17) GGHS Bago Banda Mardan.	Against Vacant Post
86-	Mst: Samina Jehan, SET (BS-16) Incharge H/M (BS-17) GGHS Chitral.	Headmistress (BS-17) GGHS Chitral.	Against the post already occupied by her in higher BS-17
87-	Mst: Maryam Begum, (BS-16) GGHS Raabat, Dir Lower.	Headmistress (BS-17) GGHS Sado Dir Lower.	Against Vacant Post.
88-	Mst: Yasmin Begum, SET (BS-16) GGHS (BSD) Peshawar.	Headmistress (BS-17) GGHS Mohib Banda Nowshera.	Against Vacant Post
89-	Mst: Shaheen Akhtar, SET (BS-16) GGHS No.1 Peshawar Cantt.	Headmistress (BS-17) GGHS Pir Saddi Mardan.	Against Vacant Post.
90-	Mst: Bibi Zainab, SET (BS-16) GGMS Zormandi Malakand.	Instructor (BS-17) RITE (F) Dargai Malakand.	Against Vacant Post.
91-	Mst: Shaista, SET (BS-16) GGHS No.1 Mardan.	Headmistress (BS-17) GGHS Koper Mardan.	Against Vacant Post.
92-	Mst: Rehana Shaheen, SET, AAEO (BS-16) Mohmand Agency.	Headmistress (BS-17) on Promotion her Services placed at the disposal of Director of Education (FATA).	Already serving in FATA.
93-	Mst: Bakht Sargand, SET (BS-16) GGHS Thana Malakand.	Headmistress (BS-17) GGHS Malakand.	Against Vacant Post.
94-	Mst: Rozina Bibi, SET GGHS Khar, Bajour Agency.	Headmistress (BS-17) on Promotion her Services placed at the disposal of Director of Education (FATA).	Already serving in FATA.
95-	Mst: Nighat Shamim, SET (BS-16) GGMS Kachori Peshawar.	Headmistress (BS-17) GGHS Gandiri Khattak Karak.	Against Vacant Post.
96-	Mst: Nighat Akhtar, SET (BS-16) ADO (F) S&L Peshawar.	Headmistress (BS-17) GGHS Kamari Palosa, Karak.	Against Vacant Post.
97-	Mst: Khurshid Begum, SET (BS-16) GGMS Fiaz Talib Abbas Bannu.	Headmistress (BS-17) GGHS Nar Shaker Ullah Bannu.	Against Vacant Post.
98-	Mst: Farzana Shaheen, SET (BS-16) SET ADO (F) S&L, D.I. Khan.	Headmistress (BS-17) GGHS Pezu Lakki Marwat.	Against Vacant Post.

22
16

ATTESTED

	Mst: Musarat Jabeen, SET (BS-16) GGMS Sheikhan Kohat.	Headmistress (BS-17) GGHS Terki Khel Karak.	Against Vacant Post.
100-	Mst: Memoona Kausar, SET (BS-16) GGHS No.1 Kohat.	Headmistress (BS-17) GGHS Dabb Karak.	Against Vacant Post
91-	Mst: Bilquis Bibi, SET (BS-16) GGHS Mankarai, Haripur.	Headmistress (BS-17) GGHS Mankarai, Haripur.	Against Vacant Post
102-	Mst: Farhat Iqbal, SET (BS-16) GGHS No.2 D.I.Khan.	Headmistress (BS-17) GGHS Gandhi Khan Khel Lakki Marwat.	Against Vacant Post
103-	Mst: Robina Afza, SET (BS-16) GGHS Kotka Juma Khan Bannu.	Headmistress (BS-17) GGHS Bangash Khel Bannu.	Against Vacant Post
104-	Mst: Saceda Begum, SET (BS-16) GGHS Mir Pur Abbottabad.	Headmistress (BS-17) GGHS Bakot Abbottabad.	Against Vacant Post
105-	Mst: Ishrat Nigha, SET (BS-16) GGMS Gulī Bagh Manshra.	Headmistress (BS-17) GGHS Kaghan, Manshra.	Against Vacant Post
106-	Mst: Afsar Jan, SET (BS-16) GGCHSS Peshawar.	Headmistress (BS-17) GGHS Shawa Dir Lower.	Against Vacant Post
107-	Mst: Nighat Yasmeen, SET (BS-16) GGHS Chimba Pind Haripur.	Headmistress (BS-17) GGHS Chimba Pind Haripur.	Against Vacant Post
108-	Mst: Shakila Begum, SET (BS-16) GGHS Kangra Colony Haripur.	Headmistress (BS-17) GGHS Kangra Colony Haripur.	Against Vacant Post
109-	Mst: Sajida Nasreen, SET (BS-16) GGHS KT Ship Haripur.	Headmistress (BS-17) GGHS Mang Haripur.	Against Vacant Post
110-	Mst: Dlowar Jan, SET (BS-16) Incharge H/M GGHS Baja Swabi.	Headmistress (BS-17) GGHS Baja Swabi.	Against the post already occupied by her.
111-	Mst: Hainida Bano, SET (BS-16) GGMS Fidgah Mardan.	Headmistress (BS-17) GGHS Saro Shah, Mardahn.	Against Vacant Post
112-	Mst: Navceda Habib, SET (BS-16) Waiting for Posting.	SET (BS-16) GGHS Nishtar Abad Peshawar.	Vice-S.No.15.

23

SECRETARY

Endst: No. SO(S) 1-4/2008/ Promotion BS-16 to BS-17 H.M. on Regular Basis.

Copy forwarded for information and necessary action to the:

- 1- Accountant General N.W.F.P. Peshawar.
- 2- Special Secretary (Regulation), Establishment Deptt. NWFP.
- 3- Director School & Literacy NEFP Peshawar.
- 4- Director Curriculum & Teachers Education NWFP Abbottabad.
- 5- Director of Education (FATA) NWFP Peshawar.
- 6- Executive District Officer's (S&L) Concerned.
- 7- District/Agency Account's Officers Concerned.
- 8- Officers concerned.
- 9- PS to Minister for (S&L) NWFP.
- 10- Deputy Database Administrator (EMIS), S&L Department.
- 11- PS to Secretary to Govt. of NWFP Schools & Literacy Peshawar.
- 12- PA to Special Secretary, Schools & Literacy Deptt: NWFP.
- 13- PA to Additional Secretary, Schools & Literacy Deptt. NWFP.
- 14- PA to Deputy Secretary (Admn) Schools & Literacy Deptt. NWFP.
- 15- Office order file.

Masrullah Khan
MASRULLAH KHAN
SECTION OFFICER (SCHOOLS).

Muhammad Tahir
Taj Muhammad

ATTESTED

GOVERNMENT OF N.W.F.P.
SCHOOLS & LITERACY DEPARTMENT

24

Dated Peshawar the 24-04-2008.

CORRIGENDUM.

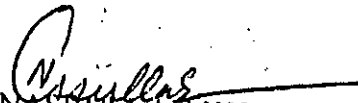
No. SO(S) 1-4/2008 Promotion BS-16 to BS-17 H.M. on Regular Basis. In continuation of this department notification of even Number dated 01-03-2008. at S.No.89 the place of adjustment of Mst: Shaheen Akhtar, SET (BS-16) GGHS No.1 Peshawar Cantt promoted as Headmistress may be read as Headmistress (BS-17) GGHS Civil Colony Peshawar instead of Headmistress GGHS Pir Saddi Mardan.

SECRETARY.

Endst. No. SO(S) 1-4/2008 Promotion BS-16 to BS-17 H.M. on Regular Basis.

Copy forwarded for information and necessary action to the:

- 1- Accountant General N.W.F.P. Peshawar.
- 2- Special Secretary (Regulation), Establishment Deptt. NWFP.
- 3- Director School & Literacy NEFP Peshawar.
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- 11- PS to Secretary to Govt. of NWFP Schools & Literacy Peshawar.
- 12- PA to Special Secretary, Schools & Literacy Deptt: NWFP.
- 13- PA to Additional Secretary, Schools & Literacy Deptt. NWFP.
- 14- PA to Deputy Secretary (Admn) Schools & Literacy Deptt. NWFP.
- 15- Office order file.


(NASIRULLAH KHAN)
SECTION OFFICER (SCHOOLS).


ATTESTED



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Annexure 9^u
26

Peshawar the November 14, 2022

NOTIFICATION

NO. AO/E&SE/6-29/LPR/Peshawar: In pursuance of Section-13 (1) of Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973), Mst. Shaheen Akhtar HM BS-17 GGHS Budhai Peshawar shall stand retire from Government service w.e.f. 18-02-2023 (A.N) on attaining sixtieth (60th) year of age, as her date of birth is 19-02-1963.

2. The Competent Authority is further pleased to allow her 365 days encashment of leave in lieu of LPR as admissible to her under the Revised Leave Rules, 1981.

SECRETARY
Govt. of Khyber Pakhtunkhwa
Elementary & Secondary Edu: Department

Endst: of even No. & date:

Copy forwarded to:

1. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. The Director, Elementary & Secondary Education, Peshawar.
3. The District Education Officer (Female), Peshawar.
4. The Director, EMIS Cell, E&SE Department for uploading at official website.
5. The Section Officer (Schools/Female), Elementary & Secondary Education Department.
6. Mst. Shaheen Akhtar HM BS-17 GGHS Budhai Peshawar.
7. Master File.


(ABDUL GHAFFAR)

SECTION OFFICER (ACCOUNTS)

ATTESTED

SECTION OFFICER (ACCOUNTS)
GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
PESHAWAR



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
BLOCK A OPPOSITE MPA, S HOSTEL, CIVIL SECRETARIAT PESHAWAR
PHONE NO 091-9223588

Dated Peshawar, December 05, 2022

NOTIFICATION

NO.SO(S/F)E&SED/4-24/2022/Seniority List/TC/BS-17: In exercise of powers conferred under Sub-Section (1) of Section-8 of the Khyber Pakhtunkhwa Civil Servant Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973) and in light of instructions bearing No.SO(P)E&AD/1-16/2011 dated 07-12-2017, the Final Seniority List of (Female) Officers (BS-17) Teaching Cadre, Elementary & Secondary Education, Khyber Pakhtunkhwa as stood on 04.11.2022 is hereby notified for information of all concerned.

**SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT**


Endst: of even No.& date:

Copy forwarded to the:

1. Director, E&SE, Khyber Pakhtunkhwa, Peshawar.
2. Director, Curriculum & Teachers Education, Khyber Pakhtunkhwa Peshawar.
3. Director, Directorate of Professional Development (DPD), Khyber Pakhtunkhwa Peshawar.
4. Director EMIS, E&SE Department.
5. All District Education Officer (Female) in Khyber Pakhtunkhwa.
6. PS to Secretary, E&SE Department.
7. Master File.

FOO m
5-12-22


(SHAWANA HALEEM)
SECTION OFFICER (S/F)


Section Officer (S/F)
Elementary & Secondary Education
Deptt: Govt: of Khyber Pakhtunkhwa

FINAL SENIORITY LIST OF FEMALE OFFICERS B-17 TEACHING CADRE OF ELEMENTARY & SECONDARY EDUCATION DEPARTMENT STOOD ON 04-11-2022

S#	Name of Officer with academic qualification	Qualification	Date of Birth	Domicile	Date of 1st Appointment in Edu; Deptt	Regular appointment/ Promotion to the present post.			REMARKS
						Regular Date	Grade	Method of Recruitment	
1	Shaheen Akhtar D/O wasal Khan GGHS Budai Peshawar	MA B.Ed	19-02-63	Mardan	14-11-1983	01-03-2008	17	By promotion	NO SO(S)1-4/2008/Promotion16 to BS17HM
2	Mst Aisha Jabeen D/o Muhammad Yahya SS (Economics) GGHS Umarzai Charsadda	MSc B.Ed	14-03-75	Peshawar	12-01-2008	12-01-2008	17	Direct Selectee	No.SO (S)/3-2/2007/SS F
3	Mst Saltanat Jehan D/O Fazl e Mabood SS GGHS Harichand Charsadda	MA B.Ed	03-12-76	Peshawar	12-01-2008	12-01-2008	17	Direct Selectee	No.SO (S)/3-2/2007/SS F
4	Naheed Fida D/O Fida muhammad HM GGHS Pind kamal khan Haripur.	MA Med	19-02-63	Haripur	30-05-1988	19-09-2009	17	By promotion	NO.SO (PE)/2-6/2007/SS F
5	Shabnam Ara D/O Malak Abdul Sami HM GGHS Bakot ATD.	MA B.Ed	18-11-62	Abbottabad	29-09-1989	19-09-2009	17	By promotion	NO.SO (PE)/2-6/2007/SS F
6	Farah Deebea HM GGHS Hakim Bharat Bannu	MSC M.Ed	01-12-66	Bannu	30-01-1990	14-11-2017	17	By promotion	SO (PE)/2-6/DPC meeting (03.10.2017)
7	Sabiha Naz D/O Shamsur Rehman Instructor RITE Swabi	msc med	05-01-73	Swabi	11-11-1999	08-10-2010	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2009/10/11/ Recruitment SS F
8	Mst. Sumaira Mehdi D/O Aksay Mehdi SS GGHS Phy: GGHS Kalu Khan Swabi	MA Med	05-11-77	D.I.Khan	09-12-2009	09-12-2009	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2009/10/11/ Recruitment SS F
9	Farzana nayyer D/O M sabir HM GGHS Mirpur haripur	MA MEd	10-02-69	Haripur	07-07-2001	10-03-2011	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2011/Headmistress
10	Ambreen Anjum D/O Sajid Ali shah HM GGHS Qasab khana peshawar	MAMEd	18-6-1971	Peshawar	16-12-1999	10-03-2011	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2011/Headmistress
11	Zeenat Yasmeen D/O Muslim Khan HM GGHS Bashir Abad Peshawar	MA MEd	18-04-74	Peshawar	28-03-1995	10-03-2011	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2011/Headmistress
12	Shagufta Anjum D/O Mohammad Masood HM GGHS city Railway station Peshawar	MA MEd	04-03-68	Mansehra	21/9/1999	10-03-2011	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2011/Headmistress
13	Mst. Bushra D/O Hakam Khan SS Stat GGHS Barawal Banda Dir Upper	MSc MEd	04-11-78	Mansehra	09-12-2009	09-12-2009	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2009/10/11/ Recruitment SS F
14	Saeeda Begum D/O Hazrat Ali SS (Pak Study) GGHS Ghallanai Mohmand	MA MEd	1.4.1983	Mohmand Agency	25.7.2006	15-09-2010	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2009/10/11/ Recruitment SS F
15	Mst. Sadaf Naz D/O Hidayat Ullah SS Econ: GGHS Sawal Dher Mardan	Msc Med	11-11-80	Peshawar	09-12-2009	09-12-2009	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2009/10/11/ Recruitment SS F
16	Sumaira Mehmood D/O Shah Mehmood SS (BIO) GGHS Azakhei Payan Nowshera	MSc MEd	19/8/1982	Peshawar	08-10-2010	08-10-2010	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2009/10/11/ Recruitment SS F
17	Saeeda Islam D/O Haji Islam-ud-Din HM GGHS Babozai Mardan	MA MEd	18-05-71	Mardan	18-05-1995	10-03-2011	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2011/Headmistress
18	Shakila D/O Syed Roidad Shah HM GGHS Kaskoroona Mardan	MA MEd	14-03-73	Mardan	08-10-1995	10-03-2011	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2011/Headmistress
19	Asma Begum D/O M Kamal SS Eng GGHS Mathra Peshawar	MA MED	08-10-74	Swabi	09-12-2009	09-12-2009	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2009/10/11/ Recruitment SS F
20	Aisha Zeb D/O Jehan Zeb SS (BIO) GGHS Harichand Charsadda	MSc M-Phil B-Ed	28-03-83	Charsadda	08-10-2010	08-10-2010	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2009/10/11/ Recruitment SS F


Section Officer (S/F)
Secondary Education
Deptt; Govt; of Khyber Pakhtunkhwa


(2)

Sl. No.	Name of Officer with academic qualification	Qualification	Date of Birth	Domicile	Date of 1st Appointment in Edu; Deptt	Regular appointment/ Promotion to the present post.			REMARKS
						Regular Date	Grade	Method of Recruitment	
1591	Mst. Parveen Balg, SS Biology, GGHSS Garam Cheshma Chitral	M/VB.Ed	13-09-1984	Chitral	17-10-2006	13-04-2018	17	By promotion	NO SO (S/F)E&SED/426/2018/ DPC/ Promotion/BS-16 to BS-17
1592	Mst. Officer Bibi, SS Biology, GGHSS Warjun Chitral	MAM.Ed	20-3-1984	Chitral	31-12-2011	13-4-2018	17	By promotion	NO SO (S/F)E&SED/426/2018/ DPC/ Promotion/BS-16 to BS-17

Certificate

- i) That the Tentative seniority list is widely circulated.
- ii) That seniority list is undisputed/ uncontroversial .
- iii) That there is no litigation pending/involved as per report of Lit Branch of this Directorate .


 Deputy Director (Female)
 Elementary & Secondary Education
 Khyber Pakhtunkhwa Peshawar


 Section Officer (S/F)
 Elementary & Secondary Education
 Deptt: Govt: of Keyber Pakhtunkhwa



GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT

Hnnexul I^a

No. SO (PSB) ED/1-4/2022/P-221
Dated Peshawar, the March 16, 2023

28 (B)

To The Secretary to the Govt. of Khyber Pakhtunkhwa,
Elementary & Secondary Education Department.

[Handwritten signature]

SUBJECT: PROMOTION OF HEADMISTRESS BS-17 TO THE POST OF
PRINCIPAL/VICE PRINCIPAL BS-18 TEACHING CADRE
(FEMALE) IN E&SE DEPARTMENT.

Dear Sir,

I am directed to refer to Elementary & Secondary Education Department letter No. SO(S/F)E&SED/3-3/2021/ Promotion, dated 13.02.2023 on the subject and to say the promotion case of Mst. Shaheen Akhtar at S.No. 1 of the panel was processed by circulation, however, Election Commission of Pakistan vide its notification dated 22.01.2023 issued directions to the Care-taker Government of Khyber Pakhtunkhwa for compliance of Section-230 of Election Act, 2017 and under Section-230(2)(e) of Election Act, 2017 Care-taker Government shall not make promotion or major appointments of Public officials.

2. The working paper and other documents received with the letter quoted above are returned herewith in original with the request to remove the name of Mst. Shaheen Akhtar from the panel and submit revised working paper by including PER for the year 2022 and final seniority list for the year 2023 as the same have now become due.

Yours faithfully, e.

[Handwritten mark]

[Handwritten signature]
SECTION OFFICER (PSB)

16/3/23

ENDST. EVEN NO. & DATE.

A copy is forwarded to the Section Officer (R-I) Establishment Department.

[Handwritten mark]

[Handwritten signature]
SECTION OFFICER (PSB)

ATTESTED

Section Officer (R-I)
Establishment
Department
Government of Khyber Pakhtunkhwa