
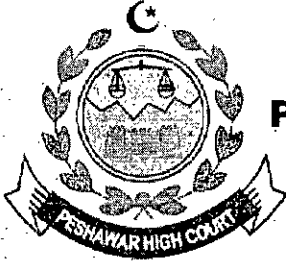


## FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No. 2206/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	24/10/2023	<p>The present appellant initially went in Writ Petition before the Hon'ble Peshawar High Court Abbottabad Bench and the Hon'ble High Court vide its order dated 26.09.2023 while treating the Writ Petition into an appeal and has sent the same to this Tribunal for decision in accordance with law. This case is entrusted to touring Single Bench at A.Abad for preliminary hearing to be put up there on</p> <p>By the Order of Chairman</p> <p> REGISTRAR</p>



THE  
**PESHAWAR HIGH COURT**  
**ABBOTTABAD BENCH.**

PH: 0992-921058  
FAX: 0992-921055  
www.peshawarhcatd.gov.pk

Service Tribunal

Diary No. 8591

No: 1068

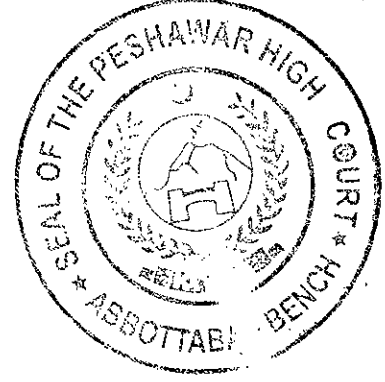
Dated Abbottabad 09/10/2023 24-1023

From

The Additional Registrar,  
Peshawar High Court,  
Abbottabad Bench.

To

The Chairman,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.



Subject

WP NO. 762-A/2023.

**Khalida Bibi.**

.....Petitioner

**VERSUS**

**Govt. of Khyber Pakhtunkhwa etc.**

.....Respondents

**MEMO,**

I am directed to forward herewith a copy of Judgment dated 26.09.2023 passed by the Honorable Court D.B in the above noted case alongwith subject WP in original for **Information & Compliance.**

  
Additional Registrar

Encl: Copy of Judgment dated 26.09.2023 alongwith WP No. 762-A/2023(In Original) is attached.

PESHAWAR HIGH COURT,  
ABBOTTABAD BENCH  
FORM 'A'  
FORM OF ORDER SHEET

Date of Order or Proceedings	ORDER OR PROCEEDINGS WITH SIGNATURE OF JUDGE/JUDGES
1	2
26.09.2023	<p><b>WP No. 762-A/2023</b></p> <p><b>Present:-</b> Sardar Sajjad Mehmood Manal, Advocate for the petitioner.</p> <p style="text-align: center;">***</p> <p><b><u>KAMRAN HAYAT MIANKHEL, J.-</u></b> Through this writ petition filed under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973, the petitioner seeks the following relief:-</p> <p style="text-align: center;"><i>“On acceptance of instant writ petition, the impugned promotion order No. 1445-55 dated 04.03.2023 passed by respondent NO. 1 and the impugned letter No. 3468 dated 29.04.2023 may graciously be declared as null and void and set-aside and respondent may kindly be directed to promote the petitioner as per law, in- service promotion rule, policy, seniority, seniority list as per required qualification and experience. Any other relief this honourable Court deemed fit and proper in the circumstances of the case. ”</i></p> <p>2. After arguing the case at great length, learned counsel for petitioner, when confronted that petitioner being civil servant would be barred from</p>

Tufail/\*

Hon'ble Justice, Kamran Hayat Miankhel  
Hon'ble Justice Muhammad Ijaz Khan

invoking constitutional jurisdiction of this Court under Article 212 of the Constitution of Islamic Republic of Pakistan, 1973, learned counsel for the petitioner requested that this petition be treated as appeal and sent to the Khyber Pakhtunkhwa, Service Tribunal for disposal in accordance with law. Learned Additional Advocate General agreed to the submissions of learned counsel for the petitioner.

3. In view of the above, this writ petition is converted into appeal and sent to the Khyber Pakhtunkhwa, Service Tribunal for disposal in accordance with law. Office shall send original petition along with Annexures to the Khyber Pakhtunkhwa Service Tribunal by retaining its copy.

4. Instant writ petition stands disposed of in above terms.

Announced.  
26.09.2023

  
JUDGE

  
JUDGE

**BEFORE THE HONOURABLE PESHAWAR HIGH COURT,**  
**ABBOTTABAD BENCH**

CM No. 458 of 2023

In

W.P. No. 762-A/2023

Khalida Bibi

...PETITIONER

**V E R S U S**

District Education Officer Female and others

...RESPONDENTS

**WRIT PETITION NO.762-A/2023**

**APPLICATION FOR ANNEXING DOCUMENTS**

**INDEX**

S.No.	Description of Document	Annexure	Page No.
1.	Application for annexing documents alongwith affidavit	--	1-2
2.	Copy of Service Promotion Policy	"A"	3-9
3.	Vakalat Nama already placed on file	--	

FILED TODAY

ADD. REGISTRAR  
P.H.C. ABBOTTABAD BENCH

*[Signature]*

...PETITIONER

Through Attorney

Through:

*[Signature]*

Dated: 21/06/2023

(SARDAR SAJJAD MEHMOOD MANAL)  
&

SCANNED  
26 JUN 2023

Office of the Additional Advocate General  
Abbottabad  
Writ Petition Branch

(SARDAR SHERAZ KHAN)<sup>gn</sup>

Advocates High Court, Abbottabad.

File Received By: *[Signature]*

Signature of Officer: *[Signature]*

Date of Receiving: 22/6/23

22/6/23

1

**BEFORE THE HONOURABLE PESHAWAR HIGH COURT,**  
**ABBOTTABAD BENCH**

CM No. 458 of 2023

In

W.P. No. 762-A/2023

Khalida Bibi

...PETITIONER

**V E R S U S**

District Education Officer Female and others

...RESPONDENTS

**WRIT PETITION NO.762-A/2023**

**APPLICATION FOR PERMISSION TO**  
**ANNEX PROMOTION POLICY AS WITH**  
**MAIN WRIT PETITION.**

*Respectfully Sheweth,*

***Facts leading to instant application are as under:-***

1. That, the titled Writ Petition is pending for adjudication before this Hon'ble Court and this petition may kindly be read and consider as integral part of main Writ Petition.
2. That, at the time of institution of Writ Petition service promotion Policy could not be annexed with the above titled Writ Petition and an irrelevant latter was annex A and mark as Annexure "A" in Writ Petition. (Copy of Service Promotion Policy is annexed as Annexure "A")

No: 1371  
11-08-2023

FILED TODAY

ADD: REGISTRAR  
PHC, ABBOTTABAD BENCH

2

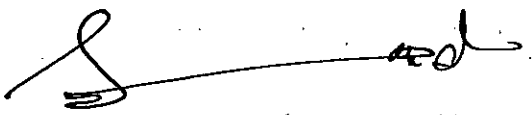
- 3. That, valuable rights of the petitioner are involved.
- 4. That other point shall be urged at the time of arguments.

It is, therefore, humbly prayed that on acceptance of instant application, the document be allowed to be filed and be deemed to be integral part of Writ Petition.

...PETITIONER

Through Attorney

Through Counsel:



(SARDAR SAJJAD MEHMOOD MANAL)

&



(SARDAR SHERAZ KHAN)


Advocates High Court, Abbottabad.

Dated: 21/6/2023

**AFFIDAVIT**

I, Jahangir Khan Advocate S/o Astam Khan R/o Mohallah Chakar Havelian, Tehsil Havelian District Abbottabad, Attorney of the Petitioner, do hereby solemnly affirm and declare on Oath that the contents of instant **Application** are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Court.

DEPONENT



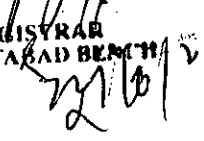
Dated: - 21/06/2023

S.#: 409/1504 **AFFIDAVIT**

Receipt # 304

Certified that the above was verified before me on this 21 day June 2023 solemn affirmation of Jahangir Khan S/o Astam Khan Mohallah Chakar Havelian by D. H. H. H. H. who was identified to me by \_\_\_\_\_ who is personally known to me.

**FILED TODAY**

ADD. REGISTRAR  
PHC ABBOTTABAD BENCH  


ADDITIONAL REGISTRAR  
Peshawar High Court, Abbottabad Bench

21/6/23

3

Annexure A



**GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**

**Peshawar, dated the 24<sup>th</sup> 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.  <b>Note:</b> If no suitable candidate is available in the relevant subject the post falling in their promotion quota shall be filled by initial



4

				recruitment; and <b>(b) fifty percent by initial recruitment.</b>
<b>1A</b>	<b>Director Physical Education (BPS-17)</b>	<b>At least second class Master's Degree in Physical Education from a recognized University.</b>	<b>22-35 years</b>	<b>(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:</b>  <b>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;</b>  <b>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>  <b>(b) fifty percent by initial recruitment; and</b>

(2)

(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>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>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>

				<p><i>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;</i></p> <p><i>(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;</i></p> <p><i>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;</i></p> <p><i>(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</i></p>
--	--	--	--	--

Handwritten notes and scribbles at the bottom right corner of the page, including the number '1634' and other illegible markings.



		<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><i>(ii) twenty Five percent by initial recruitment.</i></p> <p><b>Note:</b></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>
--	--	---

9

**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)**

# PESHAWAR HIGH COURT, ABBOTTABAD BENCH

## Advocate Detail

Full Name: SARDAR SAJJAD MEHMOOD MANAL

Father's Name: SARDAR MUHAMMAD YAQOOB

Date of Birth: 14.03.1989 CNIC # 13101-9839858-9

Permanent Address: VILLAGE MANAL P/O NARA TEHSIL HAVELIAN

DISTRICT ABBOTTABAD

Present Address: DISTRICT COURTS ABBOTTABAD

Email: \_\_\_\_\_ District: ABBOTTABAD

Mobile # 0307-8145194

License No. DC: BC-12-3634 Issue Date: 21-02-2014

License No. HC: BC-12-3634 Issue Date: 08-10-2018

License No. SC: \_\_\_\_\_ Issue Date: \_\_\_\_\_

### MENTION YOUR PENDING CASES:

Case No.	Petitioner	Respondent
Cr. Appeal No.68-A/23	Tahir Rafique	Muhammad Irshad
Cr. Appeal	Rab Nawaz	State
Cr. Appeal	Rab Nawaz	State
Cr. Appeal	Malika Bibi	Muhammad Arshad
C. R No. 162-A	Secretary KPK	Hakam Dad
Family Writ Petition	Abdul Wahid	Saima
Writ Petition	Nagina Bibi	Anayat ur Rehman

RB-444/2018  
ADDITIONAL REGISTRAR  
PESHAWAR HIGH COURT  
ABBOTTABAD BENCH  
21/6/18

**IN THE PESHAWAR HIGH COURT,**  
**ABBOTTABAD BENCH**  
**OPENING SHEET FOR WRIT BRANCH**

Case No. \_\_\_\_\_  
Date of Filing: \_\_\_\_\_  
District: Abbottabad

Case Type: WRIT PETITION

Nature of Original Proceedings: SERVICE MATTER

Category Code:

(Categories & Sub Categories are given at the back of the opening sheet)

Review/ Contempt of Court in respect of

Writ of;

Habeas Corpus  Prohibition  Mandamus  Quo Warranto  Certiorari

If Certiorari;

Forum	Date	Interlocutory /Final Order	Caste Pertains to
			<input type="checkbox"/> SB
			<input type="checkbox"/> DB

<b>Petitioner Name</b>	Khalida Bibi W/o Jahangir Khan (Advocate)
<b>Mobile No.</b>	0346-5330638
<b>Address</b>	Muhallah Railway Chakar, Havelian Tehsil Havelian District Abbottabad
<b>CNIC No.</b>	13101-3712629-7 (Attorney)
<b>Email Address</b>	Jahangirkhanjadoon@gmail.com

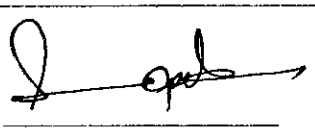
<b>Counsel for Petitioner</b>	<u>SARDAR SAJJAD MEHMOOD MANAL Advocate</u>
<b>Mobile No.</b>	0307-8145194
<b>Address</b>	District Courts Abbottabad.
<b>CNIC No.</b>	13101-9839858-9
<b>Email Address</b>	Nil

<b>Respondent(s)</b>	District Education Officer (DEO) Female Abbottabad and others
<b>Address</b>	Mentioned in the heading of instant Writ Petition

**Original Order/ Action/ Inaction Complained of;**  
Writ Petition under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973.

**Prayer;**  
It is, therefore, humbly prayed that on acceptance of instant Writ Petition, the impugned promotion Order No. 1445-55 dated 04.03.2023 passed by Respondent No.1 and the impugned Letter No. 3468 dated 29.04.2023 may graciously be declared as Null and void and set-aside and respondent may kindly be directed to promote the petitioner as per law, in-service promotion rule, policy, seniority, seniority list as per required qualification and experience. Any other relief this Honourable Court deemed fit and proper in the circumstances of the case.

**Law/Rules/Governing the original proceedings/action/Inaction**  
1. The Constitution of Islamic Republic of Pakistan, 1973.  
2. Other case law related books will be cited at the Bar.

**RE-FILED TODAY**  
**ADDITIONAL REGISTRAR**  
**PESHAWAR HIGH COURT**  
**ABBOTTABAD BENCH**  
Signature: 



**BEFORE THE HONOURABLE PESHAWAR HIGH COURT,**  
**ABBOTTABAD BENCH.**

W.P. No. 762A /2023

Khalida Bibi

*Appeal no. 2206/2023*

...PETITIONER

**VERSUS**

District Education Officer Female and others

...RESPONDENTS

**WRIT PETITION**

**INDEX**

S.No.	Description of Document	Annexures	Page No.
1.	Writ Petition alongwith Verification, Affidavit and Certificate	--	1-15
2.	Addresses of the Parties	--	16
3.	List of Books	--	17
4.	Copy of Service Book	"A"	18-19
5.	Copy of promotion Criteria	"B"	20
6.	Copies of the Seniority List and impugned promotion	"C" & "D"	21-23
7.	Copy of Departmental Appeal	"E"	24
8.	Copy of impugned Appeal letter / order	"F"	25
9.	Copy of HRIS Form	"G"	26-30
12.	Copy of notice alongwith postal receipt	"H"	31-32
13.	Court fee stamp paper worth Rs.500/-	--	33-34
14.	Power of attorney / Vakalat Nama,	--	35-38

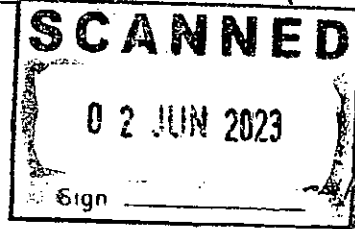
RE-FILED  
ADDITIONAL REGISTRAR  
PESHAWAR HIGH COURT  
ABBOTTABAD BENCH  
21/6/23

Through:

...PETITIONER  
Through Attorney

Dated:- 29/5 /2023

(SARDAR SAJJAD MEHMOOD MANAL)



&

(SARDAR SHERAZ KHAN)  
Advocates High Court, Abbottabad

*She*

**BEFORE THE HONOURABLE PESHAWAR HIGH COURT,**  
**ABBOTTABAD BENCH.**

Service Appeal No. 2206/2023

W.P. No. 762-A/2023

Khalida Bibi W/o Jahangir Khan (Advocate), R/o Muhallah Railway Chakar, Havelian Tehsil Havelian District Abbottabad, presently posted as Primary School Teacher PST (BPS-12), at Government Girls Primary School female Havelian Village, Tehsil Havelian District Abbottabad.

...PETITIONER

**V E R S U S**

1. District Education Officer (DEO) Female Abbottabad.
2. Sub Divisional Education Officer (SDEO) Female Havelian Circle.
3. Assistant Sub Divisional Education Officer (ASDEO), Female Havelian Circle.
4. Director Elementary and Secondary Education, Peshawar Khyber Pakhtunkhwa.
5. Secretary Education Peshawar Khyber Pakhtunkhwa.
6. Rashida Bibi, presently posted as Secondary School Teacher (SST) (BPS-16) (after promotion) in Government Girls High School Female Balolia, Kakul Abbottabad.

...RESPONDENTS

-----  
**WRIT PETITION UNDER ARTICLE 199 OF THE**  
**CONSTITUTION OF ISLAMIC REPUBLIC OF**  
**PAKISTAN, 1973, AS AMENDED UPTO DATE**  
**SOLICITING DECLARATION TO THE EFFECT**  
**THAT THE PETITIONER, IS ENTITLED AND**  
**ELIGIBLE FOR PROMOTION AS SECONDARY**  
**SCHOOL TEACHER (SST) BPS-16 IN (BIOLOGY,**

2023-4845  
30-05-23  
FILED TODAY  
ADDL REGISTRAR  
PESHAWAR HIGH COURT  
ABBOTTABAD BENCH  
RE-FILED TODAY  
ADDL REGISTRAR  
PESHAWAR HIGH COURT  
ABBOTTABAD BENCH  
21/6/23

CHEMISTRY) ON THE BASIS OF SENIORITY, SENIORITY LIST AND PROMOTION CRITERIA PRESCRIBED BY THE LAW, SERVICE RULES ISSUED BY RESPONDENTS, THE ACT OF THE RESPONDENT NO.1, 2 AND 3 TO BYPASS THE PETITIONER FOR PROMOTION AND IMPUGNED PROMOTION ORDER ENDORSEMENT NO.1445-55 DATED 04.03.2023 PASSED BY RESPONDENT NO. 01 AND REJECTION APPEAL LETTER OF PETITIONER DATED 29.04.2023 LETTER NO. 3468 ARE AGAINST THE LAW, CONSTITUTION, RULE POLICY, WITHOUT JURISDICTION, UNLAWFUL, MALAFIDE, WITHOUT LAWFUL AUTHORITY, ARBITRARY, PERVERSE, CAPRICIOUS AND FANCIFUL, AGAINST THE FACT AND CONSTITUTION AND AGAINST THE FUNDAMENTAL RIGHT, GRANTED BY THE CONSTITUTION HAS NO LEGAL EFFECT ON RIGHT ON PETITIONER & IS LIABLE TO SET-ASIDE

---

---

PRAYER:

ON ACCEPTANCE OF INSTANT WRIT PETITION, THE IMPUGNED PROMOTION ORDER NO. 1445-55 DATED 04.03.2023 PASSED BY RESPONDENT NO.1 AND THE IMPUGNED

RE-FILED TODAY  
16  
ADDITIONAL REGISTRAR  
PESHAWAR HIGH COURT  
ABBOTTABAD BENCH  
21/6/23

LETTER NO. 3468 DATED 29.04.2023 MAY GRACIOUSLY BE DECLARED AS NULL AND VOID AND SET-ASIDE AND RESPONDENT MAY KINDLY BE DIRECTED TO PROMOTE THE PETITIONER AS PER LAW, IN-SERVICE PROMOTION RULE, POLICY, SENIORITY, SENIORITY LIST AS PER REQUIRED QUALIFICATION AND EXPERIENCE. ANY OTHER RELIEF THIS HONOURABLE COURT DEEMED FIT AND PROPER IN THE CIRCUMSTANCES OF THE CASE.

---

*Respectfully Sheweth,*

**FACTS**

1. That the petitioner is educated upto BSC in Bio, Chemistry and holds MA education and B.ED Degree and serving in education department as Primary School Teacher Female since 09.05.2015. (Copy of Service Book is annexed as Annexure "A")
2. That on completion of seven year required experience as per prescribed qualification, criteria in-service for promotion, petitioner is eligible to be promoted as Secondary School Teacher (SST) BPS-16 in (BIO, Chemistry).

RE-FILED TODAY  
ADDITIONAL REGISTRAR  
PESHAWAR HIGH COURT  
ABOTTAABAD BENCH  
21/6/23

promotion Criteria is annexed as Annexure "B")

3. That on October 2022, respondent No.3 issued a circular notice through teachers Whatsapp group to all the teachers of Havelian Circle to collect their service books from the office of Respondent No.2 and complete the file for promotion, the petitioner collected her service book from the office of respondent No.2 and after that submitted the complete file in the office of respondent No.2 for in-service promotion.
4. That in order to deprive the petitioner from his legal and fundamental right on 04.03.2023 vide order No. 1445-55 respondent No. 1 against the law, fact and constitution promoted respondent No. 6 whose is junior than the petitioner and her service tenure did not become mature, as her service was less than seven years and she was appointed on 04.03.2016 and she was placed at serial No. 362 of seniority list while the petitioner was appointed on 05.05.2015 and petitioner is placed at serial No.358 of Seniority list. (Copies of the Seniority List and impugned promotion are annexed as Annexures "C" & "D" respectively)

RE-FILED TODAY  
ADDITIONAL REGISTRAR  
PESHAWAR HIGH COURT  
ABBOTTABAD BENCH  
17/07/23

5. That while feeling aggrieved from the above mentioned situation the petitioner preferred an appeal before Respondent No.1 dated 13.03.2023, vide diary No. 740. **(Copy of Departmental Appeal is annexed as Annexure "E")**
6. That vide impugned order No.3468 dated 29.04.2023 passed by respondent No. 1 against the law, seniority, seniority list, in-service promotion policy, fact, constitution, service rule and Departmental Policy, rejected the departmental appeal of petitioner through impugned letter. **(Copy of impugned letter / order is annexed as Annexure "F")**
7. That feeling highly aggrieved and dissatisfied from the above referred situation and impugned orders, the petitioner approach this Honourable Court to declare the acts of respondents contrary to law, fact, constitution, service rule and policy on the following legal grounds inter-alia:-

**GROUND:-**

- a. That the impugned acts of respondents to promote a junior teacher whose service tenure did not become mature and by

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ABBOTTABAD BENCH  
9/10/22

dropping the petitioner who is eligible for promotion as per law in-service rule, prescribed service tenure is illegal, unlawful, without lawful authority, arbitrary, perverse, against the natural justice, hence, ineffective upon the right of the petitioner and is liable to be set-aside.

- b. That the impugned acts and orders of the respondents are sheer example of highhandedness and political motivation. Hence, liable to be set-aside.
- c. That the impugned acts and orders of respondents is a worst example of discrimination and misuse of powers / authority.
- d. That the respondents are under pressure and surely made a promotion of the person at the direction of influential person on approach notwithstanding the policy, merit and principle of equity and natural justice.
- e. That the respondents have not treated the petitioner in accordance with law, rules and policy on the subject and acted in violation of

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ABBOTTABAD BENCH  
21/6/13

article 4, 25 and 27 of the constitution of Islamic Republic of Pakistan 1973 and made promotion without considering seniority, seniority list as well as the required service experience, which is unjust, unfair illegal and hence not sustainable in the eye of law.

f. That under section 24-A of general clauses Act, 1897, where any authority is vested with the power to make any order, such power shall be exercised reasonably, fairly, justly and for the advancement of the purposes of enactment under which the power is conferred but in the case in hand the power was not exercised as such rather the same was misused arbitrarily to the discriminate the petitioner without any rhyme of reason, therefore, the act of the respondent is not legally maintainable.

g. That in view of educational qualification and prescribed and required Seven Years' experience, under the in-service promotion law, rules and policy the petitioner should have been promoted as such but the petitioner were bypassed and dropped without

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ABBOTTABAD BENCH  
2/6/13



assigning any plausible and justified reason,  
Hence, the impugned act is a nullity in the eye  
of law which is liable to be set aside.

- h. That the petitioner as stated above, is qualified and deserves to be promoted as Secondary School Teacher (SST), on merit and seniority the respondents are legally and constitutionally bound to promote the petitioner but with their collusion they promoted respondent No.6 who is junior than petitioner and whose service tenure also not become mature.
- i. That after applying for the said promotion and fulfilling all other codal formalities, petitioner is entitled to be promoted but non promotion of the petitioner by the respondents is without any lawful justification which has resulted in serious miscarriage of justice and is amount to sheer discrimination on the part of respondents.
- j. That it is inalienable right of every citizen to be dealt and treated in accordance with law and especially when placed in better position with

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ABBOTTABAD BENCH  
21/5/13

the other persons, thus, the impugned act being nullity in the eye of law is liable to be struck down.

- k. That in view of policy for promotion of Secondary School Teacher (SST) the petitioner should have been promoted as such but the act of respondents, surely, is malafide, and not justifiable by any stretch of imagination. Hence, the impugned act is a nullity in the eye of law which is liable to be set aside.
- l. That the respondents No.1, 2 and 3 failed to consider the fact that due to this illegal and unlawful promotion order of respondent No.6 unqualified, ineligible teacher promotion will badly effect the petitioner rights, petitioner will suffer irreparable financial and service loss and will become junior from the respondent No.6, promotion of petitioner will become late for 01 year, against the law, in-service promotion laws, promotion criteria, rule constitution, promoted the respondent No.6 and rejected the appeal of petitioner which is illegal, unlawful and liable to be set-aside.

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ABBOTABAD BENCH  
21/6/19

m. That the learned respondent No. 1 failed to consider the fact that petitioner submitted complete file for her promotion in the office of Respondent No.2 after fulfilling codal formalities, Educational, experience and complete service data is already updated & available on HRIS website and service book of petitioner is already in the custody of respondent No.2, illegally and unlawfully promoted respondent No.6 against the promotion criteria law, seniority, seniority list, constitution in order to accommodate and facilitate respondent No. 6 and to deprive the petitioner from her legal and fundamental rights, made unlawful / illegal promotion, the acts of the respondents are against law, constitution and policy and are liable to set-aside. (Copy of HRIS Form is annexed as Annexure "G")

n. That respondent No. 1, 2 and 3 also didn't took into consideration that as per law, rule and policy, no one can be promoted until and unless possess a required qualification and fulfilling the required criteria i.e. (1) Service

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ABBOTTABAD BENCH  
21/6/23

tenure of seven years and second class (2) B.Sc degree in relevant subject against the law, service rules, seniority list made unlawful/ illegal promotion, the acts of the respondents are against law, constitution and policy and are liable to set-aside.

o. That the reason assigned in impugned letter / order is contrary and alien to law, because all required data of petitioner is updated and available on HRIS website and original service book of petitioner is also in the custody of respondent No. 2 and 3 and the petitioner is senior and eligible to be promoted as per seniority list and the respondents were duty bound to inquire and ensure the merit, so no one may discriminate, against law, promotion criteria, fact and constitution. Promote respondent No. 6.

p. That respondent No. 1 in slip shot manner, rejected the departmental appeal of petitioner in order to protect their unlawful, unjust act, the impugned promotion order on the score alone the impugned promotion order and

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ABBOTTABAD BENCH  
24/8/23

orders of respondents are liable to be struck down and set-aside.

- q. That no other efficacious, speedy or adequate remedy is available to the petitioner except the instant constitutional petition.
- r. That notice/ intimation of filling the instant Writ Petition has duly been served upon the respondents through registered post. **(Copies of notice & receipt are attached as annexure "H")**
- s. That the other points shall be agitated at the time of arguments with the leave of this Honourable Court.
- t. That, Court fees stamp paper worth Rs.500/- is attached herewith.

**PRAYER:-**

It is, therefore, humbly prayed that on acceptance of instant Writ Petition, the impugned promotion Order No. 1445-55 dated 04.03.2023 passed by Respondent No.1 and the impugned Letter No. 3468 dated 29.04.2023 may graciously be declared as

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ABBOTTABAD BENCH  
21/07/23

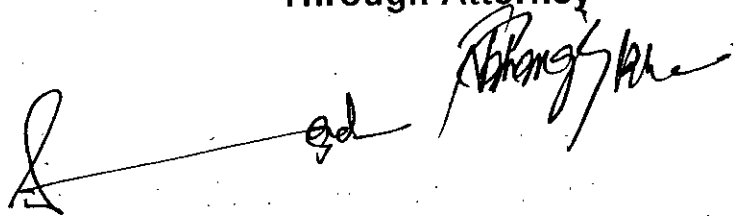
Null and void and set-aside and respondent may kindly be directed to promote the petitioner as per law, in-service promotion rule, policy, seniority, seniority list as per required qualification and experience. Any other relief this Honourable Court deemed fit and proper in the circumstances of the case.

**INTERIM RELIEF:**

It is, therefore, humbly prayed that the order of the respondents No.6 may kindly be suspended and respondent may kindly be restrained not to confirm the promotion of respondent No.6 till the final disposal of the instant Writ Petition.

...PETITIONER  
Through Attorney

Through:



(SARDAR SAJJAD MEHMOOD MANAL)

Dated: - 29/5 /2023

&

(SARDAR SHERAZ KHAN)  
Advocates High Court, Abbottabad



**VERIFICATION:-**

Verified that the contents of the instant **Writ Petition** are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Court.

Dated: 29/5 /2023

...PETITIONER  
Through Attorney



RE-FILED TODAY  
ADDITIONAL REGISTRAR  
PESHAWAR HIGH COURT  
ABBOTTABAD BENCH  
27/07/23

**BEFORE THE HONOURABLE PESHAWAR HIGH COURT,**  
**ABBOTTABAD BENCH.**

W.P. No. \_\_\_\_\_ /2023

Khalida Bibi

...PETITIONER

**V E R S U S**

District Education Officer Female and others

...RESPONDENTS

**WRIT PETITION**

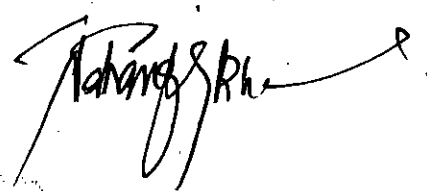
**AFFIDAVIT**

I, Jahangir Khan Advocate S/o Astam Khan R/o Mohallah Chakar Havelian, Tehsil Havelian District Abbottabad, Attorney of the Petitioner, do hereby solemnly affirm and declare on Oath that the contents of instant *Writ Petition* are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Court.

Dated: 29/05/2023

...DEPONENT

13101 - 3712629 - 7



S.No: 3560/705 Folio No: 705

Sworn that the above was verified on Solemn affidavit on 29/05 before me on this 30 day of May 2023

Jahangir Khan identified me personally known to me

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ADDITIONAL REGISTRAR  
PESHAWAR HIGH COURT  
ABBOTTABAD BENCH  
29/05/23

29/5/23

**BEFORE THE HONOURABLE PESHAWAR HIGH COURT,**  
**ABBOTTABAD BENCH.**

W.P. No. \_\_\_\_\_ /2023

Khalida Bibi

...PETITIONER

**V E R S U S**

District Education Officer Female and others

...RESPONDENTS

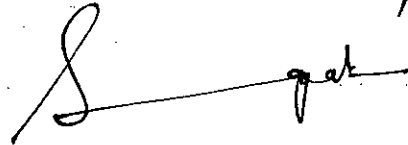
**WRIT PETITION**

**CERTIFICATE**

***Certified that no such like Writ Petition has earlier  
been filed before this Hon'ble Court.***

...PETITIONER  
Through Attorney

Through:

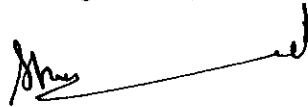


Dated: - 29/5 /2023

(SARDAR SAJJAD MEHMOOD MANAL)

&

(SARDAR SHERAZ KHAN)  
Advocates High Court, Abbottabad



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ADDITIONAL REGISTRAR  
PESHAWAR HIGH COURT  
ABBOTTABAD BENCH  
21/6/23



**BEFORE THE HONOURABLE PESHAWAR HIGH COURT,**  
**ABBOTTABAD BENCH.**

W.P. No. \_\_\_\_\_ /2023

Khalida Bibi

...PETITIONER

**V E R S U S**

District Education Officer Female and others

...RESPONDENTS

**WRIT PETITION**

**ADDRESSES OF THE PARTIES**

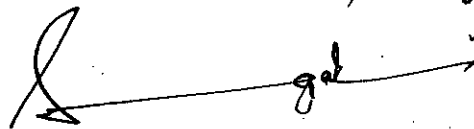
***Respectfully Sheweth;***

The addresses of the parties are as under;

**The Addresses of the parties is correctly mentioned in the heading of the Writ Petition.**

...PETITIONER

Through:

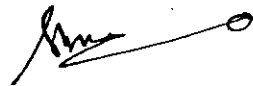


Dated: - 29/5 /2023

(SARDAR SAJJAD MEHMOOD MANAL)

&

(SARDAR SHERAZ KHAN)  
Advocates High Court, Abbottabad



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ADDITIONAL REGISTRAR  
PESHAWAR HIGH COURT  
ABBOTTABAD BENCH  
29/5/23

**BEFORE THE HONOURABLE PESHAWAR HIGH COURT,**  
**ABBOTTABAD BENCH.**

W.P. No. \_\_\_\_\_ /2023

Khalida Bibi

...PETITIONER

**V E R S U S**

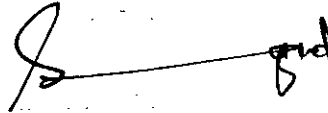
District Education Officer Female and others

...RESPONDENTS

**WRIT PETITION**

**LIST OF BOOKS**

1. The Constitution of Islamic Republic of Pakistan, 1973.
2. \_\_\_\_\_
3. \_\_\_\_\_
4. Other case law related books will be cited at the Bar.



Dated: - 29/5 /2023

(SARDAR SAJJAD MEHMOOD MANAL)

&

(SARDAR SHERAZ KHAN)  
Advocates High Court, Abbottabad



RECEIVED TODAY  
ADDITIONAL REGISTRAR  
PESHAWAR HIGH COURT  
ABBOTTABAD BENCH  
11/5/23

CIRCLE

:HAJIA GALI

(Khalida Bibi)

- ✓ Name \_\_\_\_\_ : Khalida Bibi
- ✓ Father Name : Muhammad Gulistan
- ✓ Husband Name : Jahnagir Khan jadoon
- ✓ Personal No : 00745493
- ✓ CNIC No : 13102-0567198-8
- ✓ Mob No : 03460979662
- ✓ Post : PST(BPS-12)
- ✓ Date of Birth : 04/03/1985
- ✓ 1<sup>st</sup> Appointment : 0/5/05/2015
- ✓ Qualification : B.Sc, Bed, PTC,MA(Edu)
- ✓ 1<sup>st</sup> School Name : G.G.P.S Jandalla
- ✓ Present School Name : G.G.P.S Jandalla
- ✓ ADDRESS : Moh,Railway Chakkar  
Station Havelian  
Tehsil Havelian  
District Abbottabad

## NAME OF LAST THREE SCHOOL

S #	Name of School	From	To
1	G.G.P.S Jandalla	05/05/2015	Till Now
2	G.G.P.S		
3	G.G.P.S		

(Khalida)  
Signature of Servant

(For use in Police Department only)

Held:


1. Passed BSc Examination from P.I.S.E.  
University of the Punjab, Lahore. R. No. 28122/01 marks obtained 667/850 & verified by the concerned board vide no 8547 dated 10-06-2015.

2. Passed BSc Examination from P.I.S.E.  
University of the Punjab, Lahore. R. No. 32365/01 marks obtained 632/1000 & verified by the concerned board vide no. 3784 dt 11-6-15

3. Passed BSc Examination from Hazara University Mansehra Pakistan  
University of the Punjab, Lahore. R. No. 11272 (A) 2007 marks obtained 312/550 & verified by the concerned University vide no. 5565 dt 2-7-2015

4. Passed BEd Examination from Hazara University Mansehra Pakistan (A) 2011  
University of the Punjab, Lahore. R. No. 55088 marks obtained 607/1000 & verified by the concerned vide no. 5565 dt 2-7-15

5. Passed P.T.C Examination from A.I.C.U.I  
University of the Punjab, Lahore. R. No. AD618393 session Autumn 2012 marks obtained 617/900 & verified by the concerned vide no. 56478 dt 29/5

Urdu  Asst. Dir. Officer (F) P. Y. Abbottabad	Pleadership examination Sub Divisional Educational Officer (P) Abbottabad
Drawing 	Training School Final examination
Finger Print 	Other qualification:—
Will Instructing 	
Court Duties 	

**BETTER COPY**

19.B

**(For Use in Police Department only)**

**Heirs:**

1. Passed SSC Examination from BISE Abbottabad under R.No. 281 Marks obtained 667/850 (A) 2002 and verified by the concerned Board vide No. 8542 dated 10.06.2015.
2. Passed FSC Examination from BISE Abbottabad under R. No. 32365 Marks obtained 632/1100 (A) 2004 and verified by the concerned Board vide No. 3784 dated 11.06.2015.
3. Passed BSC Examination from Hazara University Mansehra under R. No. 11272 (A) 2007 Marks obtained 312/550 and verified by the concerned University vide No. 5565 dated 02.07.2015.
4. Passed B.Ed. Examination from Hazara University Mansehra Pakistan (A) 2011 under R. No. 55088 Marks obtained 607/1000 (A) and verified by the concerned vide No. 5565 dated 02.07.2015.
5. Passed P.T.C Examination from AIOU Islamabad Under R. No. AO618393 session Autumn 2012 Marks obtained 617/900 and verified by the concerned vide No. 56498 dated 29.07.2015.

Qualification	Qualification
English	First Arts
Pushto	B.I Or FV.A
Urdu	Pleadership examination
Plan Drawing	Training School Final Examination
Finger Print	Other Qualification
Print Instructing	
Court Duties	

Sd/-  
Sub Divisional Education  
Officer (F) Abbottabad.



**DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA PESHAWAR.**

20 A

No. 2817 - 51 / R. 156.02 / Appst for DSC/DPC/Estab(M-1)  
Dated Peshawar the 18 / 07 / 2022.

All the District Education Officers (Male)  
in Khyber Pakhtunkhwa.

**Subject: DEPARTMENTAL PROMOTION OF VARIOUS DISTRICT CADRE TEACHING  
STAFF TO THE POST OF SST (UPS-10)**

Memo:

I am directed to refer to the subject cited above and to ask you to submit Working Papers for the Promotion of various Districts Teaching Cadre Staff to SST Posts as per schedule given below.

S.No.	Zone	Category with Promotion Quota	Date for DPC
1.	Winter	SST (G), SST (H/C), SST (M/P) 75%	27-07-2022
2.	Winter	(SST-IT) 50%	28-07-2022
3.	Summer	SST (G), SST (H/C), SST (M/P) 75%	01-08-2022
4.	Summer	(SST-IT) 50%	02-08-2022

Note: Please do not exclude 25% and 50% share of initial recruitment quota of SST (G), SST (H/C), SST (M/P) and SST (IT) respectively.

Assistant Director (Estab-1) 18/07/22  
Directorate of Elementary & Secondary Edu:  
Khyber Pakhtunkhwa Peshawar.

Encls: No. \_\_\_\_\_ /

Copy forwarded to the:-

1. PS to Secretary Elementary and Secondary.
2. P.A to Director Elementary and Secondary Education local office.

Assistant Director (Estab-1)  
Directorate of Elementary & Secondary Edu:  
Khyber Pakhtunkhwa Peshawar.

**DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION**  
**KHYBER PAKHTUNKHWA PESHAWAR.**

20. B

No.8117-51 /F. No.02/Appeal for DSC/DPS/Estab[M-1]  
Dated Peshawar the 18/07/2022.

To,  
All the District Education Officers {Male}  
In Khyber Pakhtunkhwa

Subject: **DEPARTMENTAL PROMOTION OF VARIOUS DISTRICT CADER  
TEACHING STAF TO THE POST OF SST [BPS-16]**

Memo:-

I am directed to refer to the subject cited above and to ask you to submit Working Papers for the Promotion of various Districts Teaching Cader Staff SST Posts as per schedule given below.

S.No.	Zone	Category with Promotion Quota	Date for DPC
1.	Winter	SST[G].SST[B/C].SST[M/P] 75%	27-07-2022
2.	Winter	[SST-IT] 50%	28-07-2022
3.	Summer	SST[G].SST[B/C].SST[M/P] 75%	01-08-2022
4.	Summer	[SST-IT] 50%	02-08-2022

**Note:** Please do exclude 25% and 50% share of initial recruitment quota of SST [G], SST [B/C], SST [M/P] and SST [IT] respectively.

**Assistance Director (Estab-1)**  
Directorate of Elementary and Secondary Edu:  
Khyber Pakhtunkhwa Peshawar.

Endst: No \_\_\_\_\_/

Copy forwarded to the:-

1. PS to Secretary Elementary and Secondary
2. PA to Director Elementary and Secondary Education local office.

**Assistance Director (Estab-1)**  
Directorate of Elementary and Secondary Edu:  
Khyber Pakhtunkhwa Peshawar.

سید اے گیسٹ ایبٹ آباد (Female) پی ایس ٹی پیپر

Tentative Seniority List Abbessabad (Female) PS-13

Slr	Roll No	Name	F/Name	Dom/Title	Crete	NPS	School	Academic	PTC	CT	B.Ed	M.Ed	D/O Birth	D/Appoint	D/Reg/Approv	Marks Obtained	PS MA
264	321	Salma Bibi	Atlas Khan	A.Abad	Hajla Gali	12	GGPS DARWAZA LANGIRAL	9.Sc	PTC				20/03/1985	28/03/2015	30/03/2015	121.74	
265	322	Zaheda Naz	Ajajib Mohammad	A.Abad	Havallan	12	GGPS Sultan Pur	M.A	PTC				13/01/1992	29/03/2015	29/03/2015	121.11	
266	323	Zahida Bibi	Sakhi Zaman	A.Abad	Nathia Gali	12	GGPS JASWARA	M.A	PTC	CT	B.Ed	M.Ed	02/03/1982	28/03/2015	31/03/2015	120.12	
267	324	Hafiztawar Bibi	Mussarat Iqbal	A.Abad	Q.ABAD	12	GGPS Ranjan	M.Sc	PTC	CT	B.Ed		12/12/1991	28/03/2015	28/03/2015	119.88	
268	325	Ayesho Bibi	Muhammad Ishtiaq Khan	A.Abad	P.K.Khan	12	GGPS Takia hall	M.Sc	PTC				01/02/1993	28/03/2015	29/03/2015	116.73	
269	326	Warda Sana	Abdul Sattar Abbas	A.Abad	Birote	12	GGPS Lihour Kass	M.Sc	PTC				07/05/1993	28/03/2015	30/03/2015	116.19	
270	327	USAMA HIRORI	SHAMS UL ARIFEN	A.Abad	A.Abad	12	GGPS MAIRA TAL	M.A	PTC				16/11/1986	28/03/2015	28/03/2015	115.22	
271	328	Bunqia Bibi	Rhuzaman	A.Abad	Nathia Gali	12	GGPS Tunda	M.A	PTC				09/09/1986	30/03/2015	30/03/2015	115.06	
272	329	Asma	Abdul Latif	A.Abad	Bol	12	GGPS Dheri Sari	M.A	PTC				05/09/1991	28/03/2015	28/03/2015	114.19	
273	330	SUNDAS NAWAZ	M NAWAZ ABASSI	A.Abad	LORA	12	GGPS DHERI BARWAL	B.A	PTC				16/06/1988	28/03/2015	28/03/2015	113.55	
274	331	Farhat Bibi	All Khan	A.Abad	Bol	12	GGPS SAHELL	M.A	PTC				10/05/1982	31/03/2015	31/03/2015	113.07	
275	332	Saeeda	Abdul Aziz	A.Abad	ROI	12	GGPS CHANIYAL	M.A	PTC				09/04/1985	30/03/2015	30/03/2015	112.09	
276	333	Rashida Noreen	Shahzaman	A.Abad	Q.ABAD	12	GGPS Chitla Maira	B.A	PTC	CT	B.Ed	M.Ed	01/01/1990	28/03/2015	28/03/2015	111.89	
277	334	KOKAB RASHEED	HAROON UR REASHEED	A.Abad	CHAMHAD	12	GGPS Turkabad	M.A	PTC				28/01/1989	28/03/2015	28/03/2015	110.97	
278	335	Saima Bibi	M.Gohar Rehman	A.Abad	Birote	12	GGPS BANDIAN	M.A	PTC				23/08/1983	28/03/2015	30/03/2015	108.57	
279	336	Bilhat Bibi	Gul Zaman	A.Abad	Nathia Gali	12	GGPS Dhaki Khatar	B.A	PTC				29/04/1990	30/03/2015	30/03/2015	108.48	
280	337	NIGHAT HUSS	SI HLYAS	A.Abad	LOILA	12	GGPS GOREENI	B.A	PTC				01/06/1992	30/03/2015	30/03/2015	108.48	
281	338	Farhat Fatima Jadoon	adlat Khan	A.Abad	Dhamtour	12	GGPS Gaidoak	M.A	PTC	CT	B.Ed	M.Ed	02/04/1992	28/03/2015	28/03/2015	106.90	
282	339	Salma Niaz	M.Niaz Abbasi	A.Abad	Birote	12	GGPS Naminol	B.A	PTC				10/08/1986	30/03/2015	28/03/2015	106.80	
283	340	Aamina Abbasi	Alcam Abbasi	A.Abad	ROI	12	GGPS PATTAN KHURD	M.A	PTC	CT	B.Ed	M.Ed	25/04/1987	28/03/2015	28/03/2015	106.23	
284	341	Shazla Abbasi	Ghulam Nahi Abbasi	A.Abad	Q.ABAD	12	GGPS Banda Ali Khan	M.A	PTC	CT	B.Ed	M.Ed	11/05/1992	28/03/2015	28/03/2015	106.20	
285	342	Saira Shamroz	Shamroz Khan	A.Abad	Birote	12	GGPS Jandala	M.A	PTC	CT	B.Ed	M.Ed	25/04/1980	28/03/2015	28/03/2015	106.10	
286	343	RAHIA NAZIR	NAZIR HUSSAIN	A.Abad	CHAMHAD	12	GGPS CHAMAK MARA I	M.A	PTC	CT	B.Ed		04/01/1986	25/03/2015	28/03/2015	105.76	
287	344	Asima Rasheed	Abdul Rasheed	A.Abad	Nathia Gali	12	GGPS JALSE TAJWAL	M.A	PTC				11/12/1990	28/03/2015	28/03/2015	104.34	
288	345	Melonnaz Bibi	Taj Muhammad	A.Abad	Birote	12	GGPS Pagar Khan Kalan	M.A	PTC				02/02/1993	28/03/2015	28/03/2015	103.89	
289	346	Rubab Abbasi	DURIAMAN	A.Abad	Bol	12	GGPS Hadora Band	B.A	PTC	CT	B.Ed	M.Ed	16/04/1988	28/03/2015	28/03/2015	103.50	
290	347	NOREEN AKHTAR	Abdul Aziz Khan	A.Abad	Birote	12	GGPS MAJHAN	M.A	PTC				12/07/1992	28/03/2015	30/03/2015	101.20	
291	348	MARIA SAFER	M SAFER	A.Abad	LORA	12	GGPS DANNAH	B.A	PTC				17/06/1988	28/03/2015	30/03/2015	101.20	
292	349	SHABANA BIBI	MUSHTAQ ABASSI	A.Abad	LORA	12	GGPS CHABGRAN	B.A	PTC				03/01/1992	30/03/2015	30/03/2015	100.63	
293	350	Hina Ishaq	Muhsd Ishaq	A.Abad	Bol	12	GGPS Banota	M.A				B.Ed	24/09/1983	28/03/2015	28/03/2015	99.01	
294	351	Aminia Zubair	Muhammad Zubair	A.Abad	Birote	12	GGPS Pakhu Nakkar	M.A	PTC				15/01/1988	30/03/2015	30/03/2015	98.03	
295	352	Asfa Bibi	Rasheed Mehmood	A.Abad	Birote	12	GGPS Pakhu Nakkar	M.A	PTC	CT	B.Ed	M.Ed	10/06/1993	28/03/2015	28/03/2015	93.61	
296	353	Shazia Begum	Gulfaraz	A.Abad	Birote	12	GGPS Dhuong Mallach	M.A	PTC	CT	B.Ed	M.Ed	04/03/1985	05/05/2015	06/05/2015	93.33	
297	354	Starla Khanum	Affab Hussain	A.Abad	Hajla Gali	12	GGPS MOMINABAD	B.A	PTC				30/04/1983	11/05/2015	12/05/2015	85.05	
298	355	Khalida Bibi	M.Gulistan	A.Abad	Bol	12	GGPS Jandala	B.A	PTC				07/04/1985	04/03/2016	04/03/2016		
299	356	Zahida Bibi	M.Ashraf	A.Abad	Birote	12	GGPS NARDKA	M.Sc	PTC	CT	B.Ed	M.Ed	07/04/1985	04/03/2016	07/03/2016		
300	357	Sanam Naveer Abbasi	Naseer Anwer Abbasi	A.Abad	Birote	12	GGPS Kahla Kuthi	M.Sc	PTC				01/04/1985	10/03/2016	10/03/2016	129.22	
301	358	FOUZIA BIBI	Abdul Hamid	A.Abad	A.Abad	12	GGPS Comp Aid	M.Sc	PTC								
302	359	Rashida Bibi															

promoted to SST





**BETTER COPY**

**SENIORITY LIST ABBOTTABAD (FEMALE) PST TEACHERS**

S #	SN #	Name	F/Name	Domicile	Circle	BPS	School	Academic	PTC	CT	B.Ed	M.Ed	D/O/Birth	D/Appott	D/Reg:Appott	Marks obtained	Remarks
264	321	Salma Bibi	Atlas Khan	A.Ab ad	Hajia Gali	12	GGPS Darwaza Langrial	B.Sc	PTC				20/04/1985	28/03/2015	30/03/2015	121.71	
265	322	Nabeela Naz	Ajaib Muhammad	A.Ab ad	Havelian	12	GGPS Sultan Pur	M.A	PTC				13/01/1992	29/03/2015	29/03/2015	121.11	
266	323	Zakia Bibi	Sakhi Zaman	A.Ab ad	Nathiya Gali	12	GGPS Jaswara	M.A	PTC	CT	B.Ed	M.Ed	02/03/1982	28/03/2015	31/03/2015	120.12	
267	324	Bakhtawar bibi	Mussarat Iqbal	A.Ab ad	Q-Abad	12	GGPS Ranjan	M.A	PTC	CT	B.Ed		12/12/1991	28/03/2015	28/03/2015	119.40	
268	325	Aysha bibi	Muhammad Ishtiaq Khan	A.Ab ad	P.K. Khan	12	GGPS Takia Hall	M.Sc	PTC	CT	B.Ed		01/02/1993	28/03/2015	30/03/2015	117.27	
269	326	Warda Sana	Abdul Sattar Abbassi	A.Ab ad	Birote	12	GGPS Lahoor Kass	M.Sc	PTC		B.Ed		07/05/1993	28/03/2015	29/03/2015	116.73	
270	327	Usama Urooj	Shams Ul Arifeen	A.Ab ad	A.Abad	12	GGPS Maira Tal	M.A	PTC		B.Ed	M.Ed	16/11/1986	28/03/2015	30/03/2015	116.19	
271	328	Rauqia bibi	Khani Zaman	A.Ab ad	Nathiya Gali	12	GGPS Tunda	M.A	PTC				03/02/1980	28/03/2015	28/03/2015	115.22	
272	329	Asma	Abdul Latif	A.Ab ad	Boi	12	GGPS Dheri Sari	M.A	PTC				09/09/1986	30/03/2015	30/03/2015	115.06	
273	330	Sundas Nawaz	M.Nawaz Abbassi	A.Ab ad	Lora	12	GGPS Dheri Bharwala	B.A	PTC				05/09/1991	28/03/2015	30/03/2015	114.19	
274	331	Farhat bibi	Ali Khan	A.Ab ad	Boi	12	GGPS Saheli	M.A	PTC				16/06/1988	28/03/2015	28/03/2015	113.55	
275	332	Saeeda	Abdul Aziz	A.Ab ad	Boi	12	GGPS Chamyali	M.A	PTC				10/05/1982	31/03/2015	31/03/2015	113.07	
276	333	Rashida Noreen	Shahzaman	A.Ab ad	Q-Abad	12	GGPS Chitta Maira	B.A	PTC				09/04/1985	30/03/2015	30/03/2015	112.09	
277	334	Kokab Rasheed	Haroon ur Rasheed	A.Ab ad	Chamhad	12	GGPS Turkabad	M.A	PTC	CT	B.Ed	M.Ed	01/01/1990	28/03/2015	28/03/2015	111.89	
278	335	Samina bibi	M. Gohar rehman	A.Ab ad	Birote	12	GGPS Bandian	M.A	PTC		B.Ed		28/01/1989	28/03/2015	28/03/2015	110.97	
279	336	Rifat Bibi	Gul zaman	A.Ab ad	Nathigali	12	GGPS Dhaki khatar	M.A	PTC		B.Ed		23/08/1983	28/03/2015	30/03/2015	108.57	
280	337	Nighat Ilyas	M. Ilyas	A.Ab ad	Lora	12	GGPS Goreeni	B.A	PTC				29/04/1990	30/03/2015	30/03/2015	108.48	
281	338	Farhat Fatima Jadoon	Adlat Khan	A.Ab ad	Dhamtour	12	GGPS Galdoak	M.A	PTC				01/06/1992	30/03/2015	30/03/2015	108.48	
282	339	Salma Niaz	M. Niaz Abbassi	A.Ab ad	Birote	12	GGPS Nammal	M.A	PTC	CT	B.Ed	M.Ed	12/04/1992	28/03/2015	28/03/2015	106.90	
	340	Amina Abbassi	Akram abbassi	A.Ab ad	Boi	12	GGPS Pattan Khurd	B.A	PTC				10/08/1986	30/03/2015	28/03/2015	106.80	

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284	341	Shazia Abbassi	Gulam Nabi Abbassi	A.Ab ad	Q-Abad	12	GGPS Banda Ali khan	M.A	PTC	CT	B.Ed	M.Ed	25/04/1987	28/03/2015	28/03/2015	106.23
285	342	Saira Shamroz	Shamroz khan	A.Ab ad	Birote	12	GGPS Jandala	M.A	PTC	CT	B.Ed	M.Ed	11/05/1992	28/03/2015	28/03/2015	106.20
286	343	Rabia Nazeer	Nazir Hussain	A.Ab ad	Chamhad	12	GGPS Chamak Maral	M.A	PTC	CT	B.Ed	M.Ed	25/04/1980	28/03/2015	28/03/2015	106.10
287	344	Asima Rasheed	Abdul Rasheed	A.Ab ad	Nathiagali	12	GGPS Jalse Tajwal	M.A	PTC	CT	B.Ed		04/10/1986	25/03/2015	28/03/2015	105.76
288	345	Mehnaz bibi	M. Taj	A.Ab ad	Birote	12	GGPS Pagar khan kalan	M.A	PTC				11/12/1990	28/03/2015	28/03/2015	104.34
289	346	Rubab Abbassi	Duriaman	A.Ab ad	Boi	12	GGPS Hadora Bandi	B.A	PTC				02/02/1993	28/03/2015	28/03/2015	103.89
290	347	Noreen Akhtar	Abdul Aziz khan	A.Ab ad	Birote	12	GGPS Majuhan	M.A	PTC	CT	B.Ed	M.Ed	16/04/1988	28/03/2015	28/03/2015	103.50
291	348	Maria Safeer	M. Safeer	A.Ab ad	Lora	12	GGPS Danna	B.A	PTC				12/07/1992	28/03/2015	30/03/2015	101.20
292	349	Shabana bibi	Mushtaq Abbassi	A.Ab ad	Lora	12	GGPS Chabgran	B.A	PTC				17/06/1988	28/03/2015	30/03/2015	101.63
293	350	Hina Irshad	Muhd. Irshad	A.Ab ad	Boi	12	GGPS Banota	B.A	PTC				03/01/1992	30/03/2015	30/03/2015	99.01
296	353	Amina Zubair	M. Zubair	A.Ab ad	Birote	12	GGPS Pakhu nakkhar	M.A			B.Ed		04/07/1986	28/03/2015	28/03/2015	98.03
297	354	Asia bibi	Rasheed Mehmood	A.Ab ad	Birote	12	GGPS Pakhu nakkhar	M.A	PTC		B.Ed		24/09/1983	28/03/2015	28/03/2015	93.61
298	355	Shazia begum	Gul Faraz	A.Ab ad	Birote	12	GGPS Dhoong Mallach	M.A	PTC	CT	B.Ed	M.Ed	15/01/1988	30/03/2015	30/03/2015	
299	356	Maria Khanum	Aftab Hussain	A.Ab ad	Birote	12	GGPS Mominabad	M.A	PTC	CT	B.Ed	M.Ed	10/06/1993	28/03/2015	28/03/2015	85.05
301	358	Khalda Bibi	M. Gulistan	A.Ab ad	Hajia Gali	12	GGPS Jandala	M.A	PTC		B.Ed		04/03/1985	05/05/2015	06/05/2015	
302	359	Zobia bibi	M. Ashraf	A.Ab ad	Boi	12	GGPS Naroka	B.A	PTC				30/04/1983	11/05/2015	12/05/2015	85.05
303	360	Sanam Naseer Abbassi	Naseer anwer Abbassi	A.Ab ad	Birote	12	GGPS Kablta Kotli	M.Sc	PTC	CT	B.Ed	M.Ed	07/04/1985	04/03/2016	04/03/2016	
304	361	Fouzia bibi						M.Sc	PTC		B.Ed			04/03/2016	07/03/2016	
305	362	Rashida bibi	Abdul Hamid	A.Ab ad	A.Abad	12	GGPS Comp Atd	M.Sc	PTC		B.Ed	M.Ed	01/03/1985	10/03/2016	10/03/2016	129.22

## OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD.



0992-342533 0992-342314  
Drofemale.abbottabad@gmail.com

**NOTIFICATION**

Consequent upon the recommendations of Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No SO(FR)/ED-10-22(E)/2010 dated 16-07-2012 and Finance Department Endorsement No SO(FR)/ED-10-22(E)/2010 dated 16-07-2012 the following Senior (I/II) Senior DM Senior Qariya/Qaria Senior AT Senior TT/PSI, SPST/PSHT & CT II are hereby promoted to the post of SST (Bio-Chem) SST (Maths/Phy) SST (General) & SST IT noted against each BPS 16 (Rs 28070-2260-95870) respectively 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

**ITEM NO.1 PROMOTION OF PSHT B-15 TO SST (BIO./CHEM.) BPS-16 ON REGULAR BASIS**

Sl#	S/L No	Name of Teacher	Name of Present School	Academic Qualification	Professional Qualification	D.O Birth	Date of Appointment as PST	Promoted as SST and Place of Posting	Remarks
1	362	Rashida Bhatti	GGPS Crimp Abbottabad	M.Sc.	M.Ed.	01-03-1985	10-03-2016	GGHS Raiolia	A.V.P. of SST (H/C)

**ITEM NO.2 PROMOTION OF PSHT B-15 TO SST (GENERAL) BPS-16 ON REGULAR BASIS**

Sl#	S/L No	Name of Teacher	Name of Present School	Academic Qualification	Professional Qualification	D.O Birth	Date of Appointment as PST	Promoted as SST and Place of Posting	Remarks
1	R3	Rubina Shaheen	GGPS Nawan Shehr No 2	MA	B.Ed	17-05-1971	10-06-1997	GGHS Bagan	A.V.P. of SST (G)
2	R4	Shazia Afsar	GGPS Gari Phulgran	MA	B.Ed	14-01-1974	05-07-1997	GGMS Nalotha	A.V.P. of SST (G)
3	B5	Shaheen Akhtar	GGPS Sangal	MA	M.Ed / CT	15-05-1978	05-07-1997	GGMS Abbottabad	A.V.P. of SST (G)

(22) b

**BETTER COPY**

**OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD.**

0992-342533 0992-342314  
[Deofemalabbottabad@gmail.com](mailto:Deofemalabbottabad@gmail.com)

**NOTIFICATION**

Consequent upon the recommendations of Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.SO(B&A)/1 1B/F&SE/2012 and Finance Department Endorsement No. SO(FR) (FP-10) 22(F)2010 dated 16.07.2012 the following Senior CT/CT, Senior DM, Senior Qaries/Qaria Senior AT, Senior TT/PST, SPST/PSHt & CT-IT are hereby promoted to the post of SST (Bio / Chem:), SST (Maths/Phy), SST (General) & SST-IT noted against each BPS-16 (Rs.28070-2260-95870) respectively 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.

**ITEM NO.1 PROMOTION OF PSHT B-15 TO SST (BIO / CHEM) BSP-16 ON REGULAR BASIS**

S#	S/L No.	Name of Teacher	Name of Present School	Academic Qualification	Professional Qualification	D/O Birth	Date of Appointment as PST	Promoted as SST and Place of Posting	Remarks
1	362	Rashida Bibi	GGPS Comp: Abbottabad	MSC	M.Ed	01.03.1985	10.03.2016	GGHS Balolia	A.V.P of SST SST (B/C)

**ITEM NO.2 PROMOTION OF PSHT B-15 TO SST (GENERAL) BSP-16 ON REGULAR BASIS**

S#	S/L No.	Name of Teacher	Name of Present School	Academic Qualification	Professional Qualification	D/O Birth	Date of Appointment as PST	Promoted as SST and Place of Posting	Remarks
1	83	Rubina Shaheen	GGPS Nawanshehr. No.2	MA	B.Ed	12.05.1971	30.06.1997	GGHS Bagan	A.V.P of SST SST (G)
2	84	Shazia Afsar	GGPS Gari Phulgrah	MA	B.Ed	14.01.1974	05.07.1997	GGMS Nalotha	A.V.P of SST SST (G)
3	85	Shaheen Akhtar	GGPS Sangal	MA	M.Ed / CT	15.05.1978	05.07.1997	GGMS Aliabad	A.V.P of SST SST (G)

TERMS & CONDITIONS

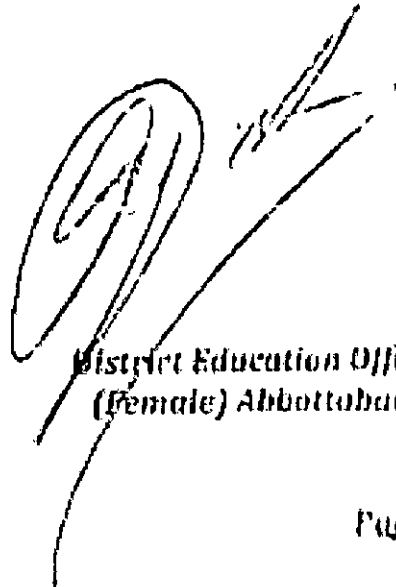
01. They would be on probation for a period of one year extendable for another one year.
02. They will be governed by such rules and regulations as may be issued from time to time by the Government.
03. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules from time to time.
04. Charge report should be submitted to all concerned.
05. Their Inter-Se-Seniority on lower post will remain intact.
06. No TA/DA is allowed for joining their duty.
07. They will give an undertaking to be recorded in their Service Book to the effect that if any payment is made to them, in light of this order will be recovered and if he/she is wrongly pronounced he/she will be reversed.
08. Before handing over charge once again their document may be checked and if they have not the required relevant qualifications as per rules, they may not be handed over charge of the post.

(Mst. Dilshad Begum)  
District Education Officer  
(Female) Abbottabad.

Endst: No. 1465-55 /EB-I/Vol-IV/Pront S-CT/S-DM/S-AT/S-TT/S-Q/PSHT to SST 2022 dated 4/3 /2021

Copy for information to the:

01. PS to Secretary to Govt. Khyber Pakhtunkhwa E&SE Department Peshawar.
02. PA to Director E&SE Khyber Pakhtunkhwa Peshawar w/r Endst No. 4451-55 / P.No. 00/2022-23 /Abbottabad, Dated 01-12-2022.
03. Deputy Director (Establishment) Directorate of E&SE Peshawar.
04. District Account office Abbottabad.
05. District Monitoring Officer Abbottabad.
06. B & A O Local office.
07. Principal / Head Mistress concerned schools.
08. SDEO (Female) concerned.
09. EMIS Branch.
10. Official concerned.
11. Office file.

  
District Education Officer  
(Female) Abbottabad.

## TERMS AND CONDITIONS

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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 Government.
3. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct they shall be proceeded under the rule framed from time to time.
4. Charged report should be submitted to all concerned.
5. Their inter-Se- Seniority on lower posts will remain intact.
6. No TA/DA is allowed for joining their 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 them. In light of this order will be recovered and if he/she is wrongly promoted he/she will be reversed.
8. 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.

**{Mst: Dilshad Begum}**  
**District Education Officer**  
**{Female} Abbottabad.**

Endst: No.1445-55/EB-I/Vol-IV/Prom S-CT/S-DM/S-AT/S-TT/S-Q/PSHT to SST 2022 Dated 4 / 3/ 2021

### Copy of information to the:-

01. P.S to secretary to Govt: Khyber PakhtunKhwa E&SE department Peshawar.
02. P.A to Director E&SE Khyber PakhtunKhwa Peshawar w/r and Endst No. 4451-55/F. NO. DPC- 2022-23 / Abbottabad, Dated 01-12-2022
03. Deputy Director {Establishment} Directorate of E&SE Peshawar.
04. District Account office Abbottabad.
05. District Monitoring office Abbottabad.
06. B & A O local office.
07. Principal / Head Mistress concerned school.
08. SDEO {Female} concerned.
09. EMIS Branch.
10. Official concerned.
11. Office file.

**District Education Officer**  
**{Female} Abbottabad**

بخدمت جناب ڈسٹرکٹ ایجوکیشن آفیسر (زنانہ) صاحبہ ایبٹ آباد۔

درخواست / اپیل

جناب مان!

تذکرہ ہے کہ میں نے اکتوبر 2022ء میں SST پر پروموشن کیلئے فائل ASDO آفس  
زنانہ ایبٹ آباد جویلیاں میں جمع کروائی میرا آرڈر بطور PST ٹیچر 05-05-2015 کو ہوا تھا۔ (نقل آرڈر  
فائل درخواست ہے) پروموشن کیلئے مانگے گئے Criteria کے مطابق میری تمام ریکوائزمنٹ پوری تھیں  
میری سروس کب و HRIS فارم جو میں نے متعلقہ ایجوکیشن آفیسر جویلیاں زنانہ میں جمع کرایا تھا میری تعلیم  
B.Sc (Chemistry, Botany, Zoology) مینشن ہے اور اکتوبر 2022 میں میری سروس بھی  
07 سال پورن تھی مورخہ 07 مارچ 2023ء کو جو ان سروس پروموشن آرڈر PST سے ترقی پا کر SST پر  
کئے گئے ہیں۔ (نقل آرڈر لف ہے) ان میں میرا آرڈر نہیں ہوا جبکہ مجھ سے جو ٹیچر جو بمطابق  
Tentative Seniority List میریل نمبر 362 پر ہے، اس کا آرڈر بطور PST مورخہ  
04-03-2016 کو ہوا تھا اسکی پروموشن کر دی گئی ہے جو کہ میریل نمبر 01 پر ہے جبکہ میں  
Seniority List میں میریل نمبر 358 پر ہوں میرا پروموشن آرڈر بطور SST نہیں کیا گیا۔ یہ کہ میں نے  
بٹور ٹیچر اپنی ذمہ داریاں ہمیشہ احسن طریقے سے انجام دی ہیں جس کا علم محکمہ کے سینئر افسران کو ہے۔

لہذا میری افسران بالا سے استدعا ہے کہ مجھے انصاف دیا جاوے اور میری پروموشن  
آرڈر بطور SST ٹیچر کیا جاوے۔

**العارضہ**

خالده بی بی PST، GGPS، جویلیاں گاؤں۔۔۔ ساکنہ

رابطہ نمبر: 0346-5330638

Khaleh





(25) Page A)

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD

No. 3468 /Promotion/SST

Dated: 29/04/2023



To

Mst. Khalida Bibi, PST  
GGPS Havellian Village

Subject: PROMOTION OF PST TO SST (BIO/CHEM).

Memo:

It is to inform you that your appeal for promotion from PST to SST (Bio/Chem) received in this office vide Diary No. 740 dated 13-03-2023 is not entertainable at this stage and rejected on the following grounds:-

1. That the Tentative Seniority List of PSTs maintained by this office was circulated amongst all the SDEO/ASDEO Offices for further information of all working teachers in the concerned Sub-Division/Circles. All the ASDEOs also shared the Tentative Seniority List through Whatsapp amongst all the working teachers of their circles for information and corrections, if any.
2. That you failed to get corrected the exact Bio-Data/particulars in the Tentative Seniority List.
3. That the corrections in the Tentative Seniority List neither recommended by any lower formation nor your case for promotion received in this office.

DISTRICT EDUCATION OFFICER  
(FEMALE) ABBOTTABAD

Endst No. 3469-71

Copy for information to:-

1. The Director, Elementary & Secondary Education: K.P.K, Peshawar
2. The Sub Divisional Education Officer, (Female) Abbottabad.
3. The Sub Divisional Education Officer, (Female) Abbottabad

DISTRICT EDUCATION OFFICER  
(FEMALE) ABBOTTABAD

**BETTER COPY**

(25) b

**OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD.**

No. 3468/ Promotion / SST  
Dated 29-04-2023

To

Mst. Khalida Bibi, PST  
GGPS Havelian Village

Subject: **PROMOTION OF PST TO SST (BIO / CHEM)**

Memo:

It is to inform you that your appeal for promotion from PST to SST (Bio/Chem) received on this office vide Diary No.740 dated 13.03.2023 is not entertainable at this stage and rejected on the following grounds:-

1. That the tentative Seniority List of PSTs maintained by this office was circulated amongst all the SDEO/ASDEO Officers for further information of all working teachers in the concerned Sub-Division/Circles. All the ASDEOs also shared the Tentative Seniority List through Whatsapp amongst all the working teachers of their circles for information and corrections, if any.
2. That you failed to get corrected the exact Bio-Data/particulars in the Tentative Seniority List.
3. That the corrections in the Tentative Seniority List neither recommended by any lower formation nor yourcase for promotion received in this Office.

Sd/-

**DISTRICT EDUCATION OFFICER  
(FEMALE) ABBOTTABAD**

Endst No. **3469-71**

**Copy for information to:-**

1. The Director, Elementary & Secondary Education K.P.K Peshawar.
2. The Sub Divisional Education Officer, (Female) Abbottabad.
3. The Sub Divisional Education Officer, (Female) Abbottabad.

Sd/-

**DISTRICT EDUCATION OFFICER  
(FEMALE) ABBOTTABAD**



## Human Resource Information System (HRIS)

### Elementary & Secondary Education Department Khyber Pakhtunkhwa Personal Data Collection Questionnaire



#### PREAMBLE

The Elementary and Secondary Education department Khyber Pakhtunkhwa has developed Human Resource Information System (HRIS) through which the department will be able to create digital profiles of the employees across the province from any location. In future the HRIS will be used for all posting/transfer, promotion and all type of HR planning and decision making which will benefit both education system and employees. In the first step all employees (management, teaching, non-teaching e.t.c) shall provide data on the questionnaire and later they will be provided on-line access to their personal data for editing and updating. Keeping in view its importance, you are required to fill up the questionnaire carefully. For any assistance you may contact your respective office please.

#### SECTION-A EMPLOYEE BASIC INFORMATION

1. Employee Name (Capital): KHALIDA BIBI
2. Father's Name (Capital): MUHAMMAD GULISTAN.
3. Gender:
 

Male	Female
	✓
4. Marital Status:
 

Single	Married	Widowed	other
	✓		
5. Blood group:
 

A+	A-	B+	B-	AB+	AB-	O+	O-
✓							
6. Husband Name (capital letters) JAHANGIR KHAN JADOON.
7. Is spouse a Govt. Servant:
 

Yes	No
	✓
8. Is spouse working in E&SED
 

Yes	No
	✓
9. Date of birth: 04-March-1985. e.g. (25-jan-2020)
10. CNIC: 

1	3	1	0	2	-	0	5	6	7	1	9	8	-	8
---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
11. Date of first entry into Govt. Service. 6<sup>th</sup>-May-2015 e.g. (25-jan-2020)
12. Date of entry in E&SED: 6<sup>th</sup>. May. 2015 e.g. (25-jan-2020)
13. Religion: Islam.
14. Personnel No. 00745493
15. GP Fund, Account No: 745493
16. Employee NTN No (if any): NIL

(27)

17. Passport No (if any): NiE
18. Province: Khyber Pakhtunkhwa K.P.K
19. Division: Hazara.
20. District: Abbottabad
21. Tehsil: Havelian
22. Union Council: Dewal Menal.
23. District Domicile: Abbottabad.
24. Disability:

S.No.	Disability Type	Severity
1	Difficulty in Seeing (Visual Disorder) Even after wearing glasses	Some difficulty
		Cannot do at all
2	Difficulty in Hearing (Hearing Disorder) Even after using hearing aid	Some difficulty
		Cannot do at all
3	Difficulty in Walking (Physical Disorder) or Climbing Steps (Leg / Foot)	Some difficulty
		Cannot do at all
4	Difficulty in remembering or concentrating (Psychological Issues)	Some difficulty
		Cannot do at all
5	Difficulty with ADL (self-care) such as washing all over or dressing (Hand / Arm)	Some difficulty
		Cannot do at all
6	Difficulty in Communicating using usual (customary) language (Speech Disorder)	Some difficulty
		Cannot do at all

25. Mother Tongue: Hinako
26. Mobile No: 0346-0979662 (e.g. 0000-0000000)
27. Contact No. (emergency contact No.): 0346-5330638
28. E-Mail Address: khalidabibihvn@gmail.com
29. Current Address: Muhallah Railway chakkar near railway station.
30. Permanent Address: Post office chando maxa, village Karachh, Tehsil Havelian District Abbottabad.
31. Initial recruitment in ESED:
- | Departmental | PSC | ETEA | NTS                                 | FTS | Other (write the Name) |
|--------------|-----|------|-------------------------------------|-----|------------------------|
|              |     |      | <input checked="" type="checkbox"/> |     |                        |
32. Initial recruitment in ESED (1<sup>st</sup> Order Date) 6<sup>th</sup> May 2015 e.g. (01-Jan-2020)

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33. Initial recruitment in ESED Appointment Quota:

Open Merit	Minority	Disable	Deceased	Other
✓				

34. Dual Nationality:

Yes (If Yes please Mentioned Country Name)	No
	✓

35. Residence Coordinates (up to 5 decimal places):\*

X	Y
34.04748 (X)	73.15856

\*Install GPS Coordinates Application on your Android Mobile and search your location at your residence.

**SECTION-B EMPLOYEE DETAIL INFORMATION**

36. Posting/Transfer Information (Starting from Current Post)

S.No.	Posting Type Internal/ External*	School/Office	From Date	To Date	Deputation Yes/No	Notification No. and Date
1	Internal	G.G.P.S.	6-May-2015	up till now	-	-
2		Jandalla				
3						

- \* i. Internal (Elementary & Secondary Education Department)
- ii. External (Other than E&SE Department)

37. BPS Record (Starting from Current BPS)

BPS	Start Date	To date	Notification No/Date	Remarks (if any)
12	6-May-2015	up till now		

38. Job Type (Starting from Current BPS)

Job Type*	Start Date	To date	Notification No/Date	Remarks (if any)
Regular	6th-May-2015	up till now	Endst: No 3620-27	
	6th-May-2015	5th-May-2015	Endst-8020-25	

- \*i. Regular ii. Adhoc iii. Contract iv. Project

(29)

39. Cadre Group

Group	Designation	Starting Date	End Date	Seniority list# (if Available)
Teaching	P.S.T	6th May 2015	up till now	NIL

(i. Teaching ii. Non-teaching iii. Ministerial iv. Management)

40. Academic Qualification (start from highest)

Qualification/ Degree title	Board/University	Major Subject(s)	Total Marks/ CGPA	Obtained Marks/ CGPA	%age	Session Year	Regular/ Private
1. B.Sc	Hazara University	Chemistry Botany	550	312	57%	2007	Regular
2. F.Sc	BISE - Atd	Zoology Pre-Medical	1100	632	57%	2004	Regular
3. Matric	BISE - Atd	Science Group	850	667	78%	2002	Regular

41. Professional Qualification (start from highest)

Certificate/ Diploma	Institution/Board/University	Total Marks/ CGPA	Obtained Marks/ CGPA	%age	Session Year	Regular/ Private
M.Ed sci	Sarkhad university of science and information technology Peshawar	2200	1648	74%	2018	Regular
B.Ed sci	Hazara University	1000	607	60.70%	2012	Regular
P.T.C	Allama Iqbal open university	900	617	69%	2013	Regular

42. Skill / Expertise (if any)

Skill/Expertise	Area	Detail
NIL	-	-

43. Training Record (Training having 3 or more than 3 days)

Name/Title of Training	From date	To Date	Venue	Training conducted by	Trainer/ Trainee	Local/ foreign
Class 4th English	24-March	to 4 April 2017	Hun station	British Council	Trainer	Local
Class 2nd English	10-Dec	22-Dec 2017	"	"	"	"
Class 5th	3-March	7 March 2017	"	PTTF	"	"

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44. Dependent Details\*

Relationship	Gender	Name	DOB	If Govt. employee then please mention		
				Department	Designation/BPS	Personnel No.
Husband	Male	Jahangir Khan	15-April-1982	Nid	-	-

\*(i. Parents ii. Husband/Wife(s) iii. Son/daughter iv. Sisters v. Minor Brothers)

45. Bank Detail

Bank Name	Account Title	Branch Name	Branch Code	Account Number	IBAN
ABL	Current	Havelian, Teh Distt - Abbottabad	0140104	0010033547860015	PK91ABPA0010033547860015

46. Leaves Detail (if any) (Please Select Leave Code from the Chart\*)

Leave Code	From Date	To Date	Leave Reason	Leave with or without pay
120			Tubes leproscopy for kids	With pay

\*Leave Chart

Leave Name	Leave Code	Leave Name	Leave Code
Medical Leave	120	Special Leave--Vocational	430
Special Leave	230	Recreational Leave--Vocational	420
Recreational Leave	220	Disability Leave--Vocational 50%	415
Disability Leave 50%	215	Disability Leave--Vocational	410
Leave with Full Pay	110	leave not due--vocational	400
Causal Leave	100	Ex. Pakistan Leave--Vocational	390
Study Leave-Vocational	370	Quarantine Leave--Vocational	380
Maternity Leave-Vocational	360	Study Leave--Vocational 75%	375
Leave Preparation to Retirement	330	Leave without Pay--Vocational	350
Disability Leave	210	Leave Half Average Pay--Vocational	340
Leave not due	200	Medical Leave--Vocational	320
Ex. Pakistan Leave	190	Leave with Full Pay--Vocational	310
Quarantine Leave	180	Casual Leave--Vocational	300
Study Leave 75%	175	Leave Half Average Pay	140
Study Leave	170	Leave Prep: to Retirement	130
Maternity Leave	160	Casual Leave	100
Leave Without Pay	150	Earned Leave	000

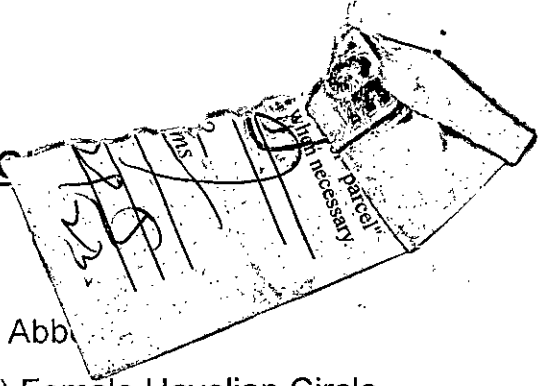
Please attach extra sheets for information where required.

Employee Signature Khalida  
 HEAD TEACHER  
 G.G.P.S Jandalla  
 Abbottabad

Officer Incharge HEAD TEACHER  
**G.G.P.S Jandalla**  
 Abbottabad

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**NOTICE THROUGH REG**



To,

1. District Education Officer (DEO) Female Abb.
2. Sub Divisional Education Officer (SDEO) Female Havelian Circle.
3. Assistant Sub Divisional Education Officer (ASDEO), Female Havelian Circle.
4. Director Elementary and Secondary Education, Peshawar Khyber Pakhtunkhwa.
5. Secretary Education Peshawar Khyber Pakhtunkhwa.
6. Rashida Bibi, presently posted as Senior Science Teacher (BPS-16) (after promotion) in Government Girls High School Female Balolia, Kakul Abbottabad.

**SUBJECT: INTIMATION NOTICE REGARDING THE WRIT PETITION TITLED "KHALIDA BIBI VS DEO FEMALE ETC"**

**Undersigned** has filed a Writ Petition titled "**Khalida Bibi VS DEO etc**"; before the Honourable Peshawar High Court, Abbottabad Bench Writ Petition under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973, and you are hereby served with the instant notice under the requirement of law for information please.

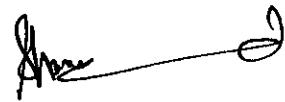
***Copy of the Writ Petition is also annexed herewith for ready reference.***

Dated: 29/5 /2023

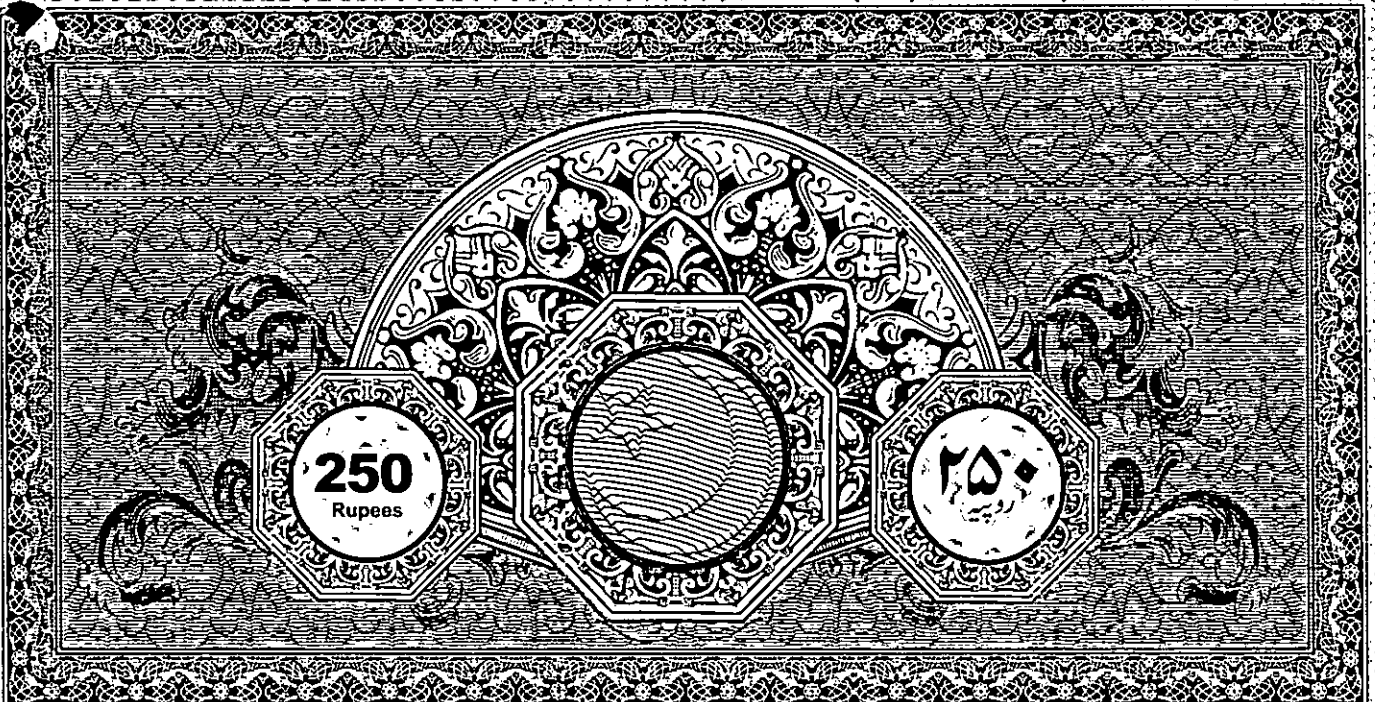
  
(SARDAR SAJJAD MEHMOOD MANAL)

&

(SARDAR SHERAZ KHAN)  
Advocates High Court, Abbottabad





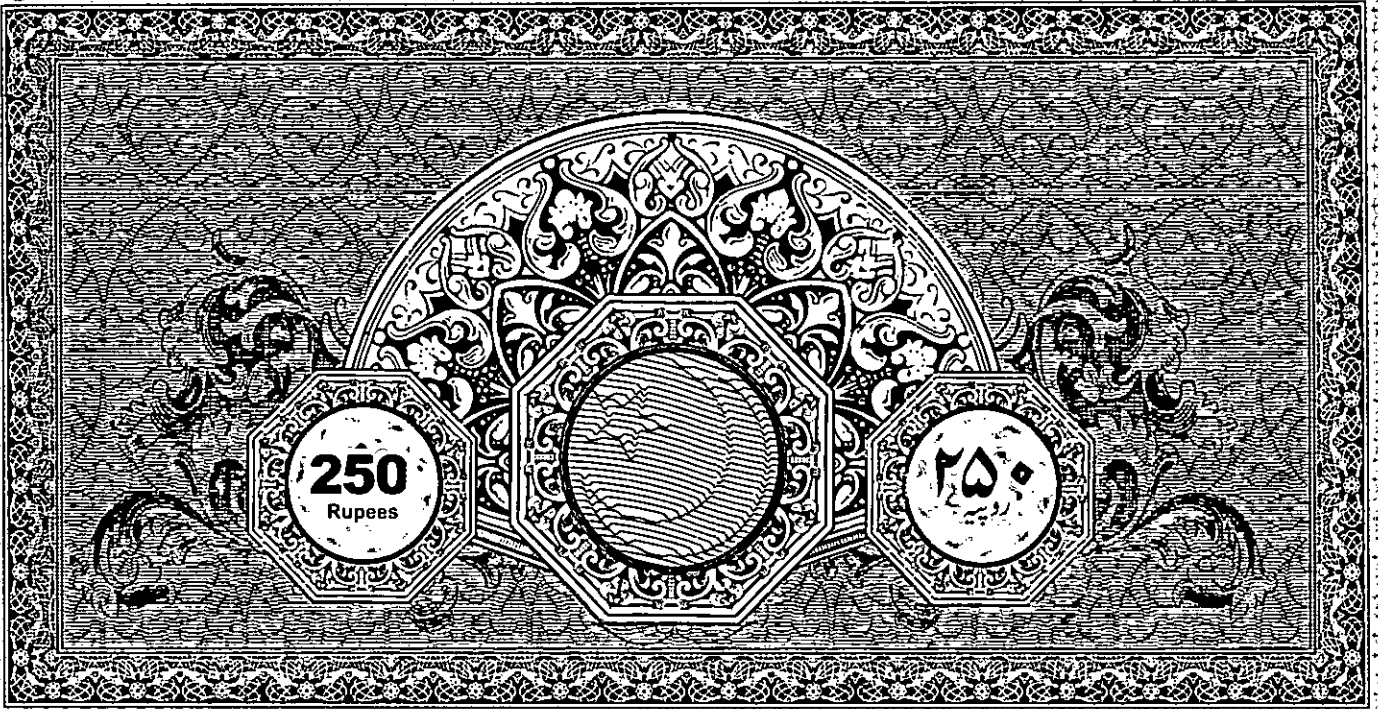


PAKISTAN COURT FEE

CANCELLED

CANCELLED

RE-FILED TODAY  
ADDITIONAL REGISTRAR  
PESHAWAR HIGH COURT  
ABBOTTABAD BENCH  
21/04



PAKISTAN COURT FEE

**CANCELLED**

**CANCELLED**

رجسٹریٹر  
پشاور ہائی کورٹ  
آبٹوٹا بڈ بینچ

**RE-FILED TODAY**  
ADDITIONAL REGISTRAR  
PESHAWAR HIGH COURT  
ABBOTTABAD BENCH  
11/07/11



PAKISTAN National Identity Card  
ISLAMIC REPUBLIC OF PAKISTAN



Name  
Khalida Bibi



Husband Name  
Jahangir Khan

خالدہ بی بی

جہانگیر خان

Gender: F Country of Stay: Pakistan

Identity Number: 13102-0567190-8

Date of Birth: 04.03.1985

Date of Issue: 22.03.2021

Date of Expiry: 22.03.2031



Holder's Signature

100 Rupees

مقامی ادارہ سے رقم = 300/- روپے

مختار صاحب

مذکورہ خاتون خالدہ بی بی زوجہ جہانگیر خان لہور سے تعلق رکھتی ہیں۔  
مختار صاحب نے ان سے رقم 300/- روپے وصول کی ہے۔  
مختار صاحب نے ان سے رقم 300/- روپے وصول کی ہے۔  
مختار صاحب نے ان سے رقم 300/- روپے وصول کی ہے۔

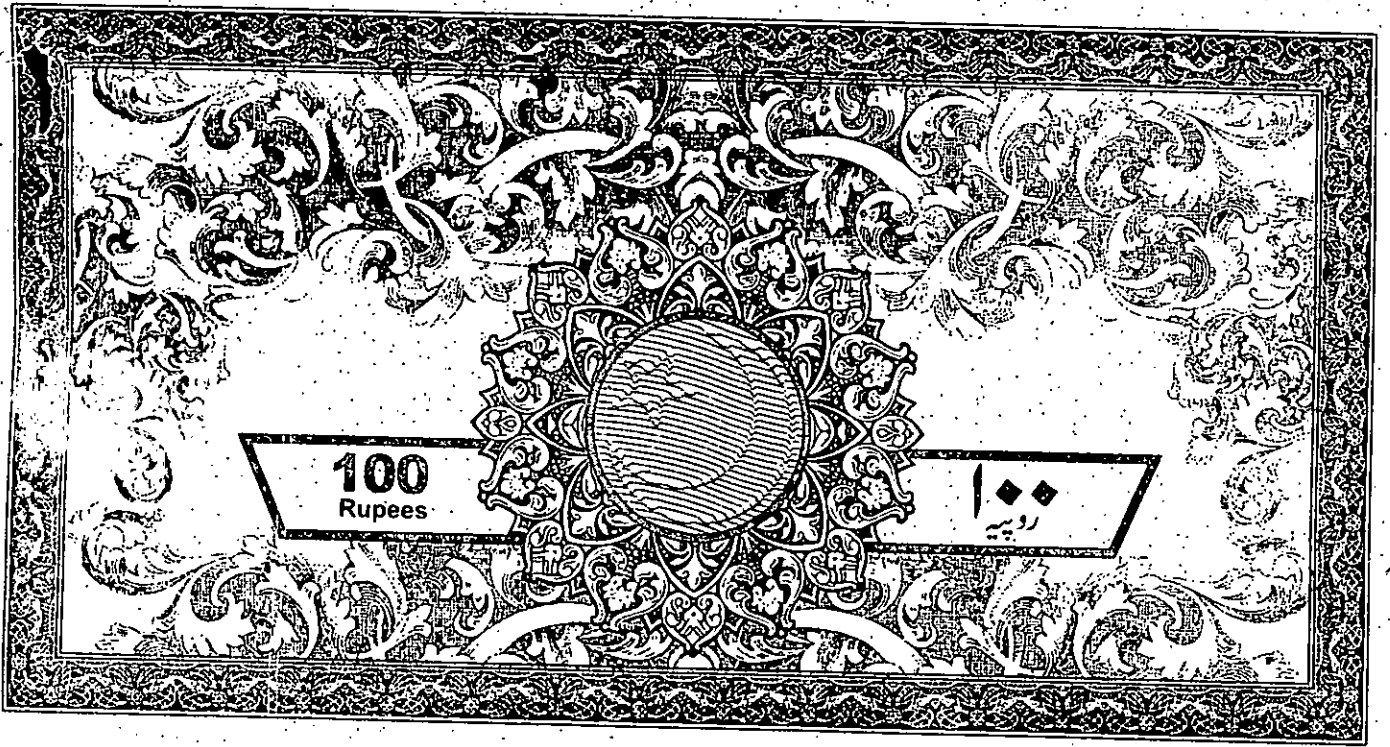
مختار صاحب نے ان سے رقم 300/- روپے وصول کی ہے۔  
مختار صاحب نے ان سے رقم 300/- روپے وصول کی ہے۔  
مختار صاحب نے ان سے رقم 300/- روپے وصول کی ہے۔



انہی کے پاس رقم 300/- روپے موجود ہے۔  
مختار صاحب نے ان سے رقم 300/- روپے وصول کی ہے۔  
مختار صاحب نے ان سے رقم 300/- روپے وصول کی ہے۔  
مختار صاحب نے ان سے رقم 300/- روپے وصول کی ہے۔

29/07/2021

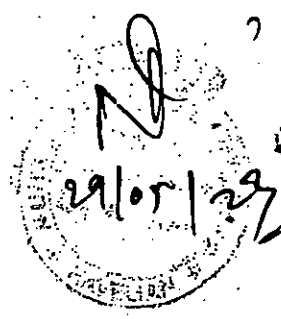
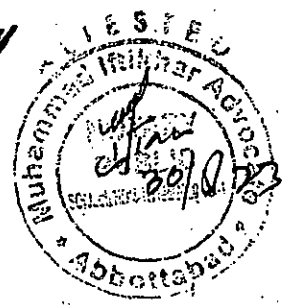




30

13102-0392622-1  
 عابد رضا بن اعجاز  
 عابد رضا بن اعجاز

13102-0410144-9  
 محمد اعجاز بن اعجاز  
 محمد اعجاز بن اعجاز



MUHAMMAD MEHMOOD  
 HAVELIA  
 29/05/23

Other Bar ADV's I.D No. \_\_\_\_\_

BC No. \_\_\_\_\_

Place of Practice AbbottabadName of Advocate Sardar Sajjad Mehmood Manal

Out Station

SARDAR AMBER MAQSOOD  
Finance Secretary  
High Court Bar Association  
Abbottabad  
00720

S. No. \_\_\_\_\_



## وکالت نامہ

ضابطہ کیس نمائندگی کی کورٹ ایسٹ ایبٹ آباد بینچ

نام \_\_\_\_\_

خالدہ بی بی

نوٹیت مقدمہ: Writ petition

ایسٹریٹ

باعث تحریر آئیکہ:

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواہد ہی برائے پیشی یا تصفیہ مقدمہ بمقام ایسٹ ایبٹ آباد کے لیے

سردار سجاد محمود ضابطہ سر راز خان ضابطہ ایڈووکیٹس مائل کورٹ ایبٹ آباد

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص تر و بروعدالت حاضر ہوتا ہوں گا اور بروقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا۔ اگر پیشی پر مظہر حاضر نہ ہوا اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طور پر ذمہ دار نہ ہونگے نیز وکیل صاحب موصوف صدر مقام پچھری کے علاوہ کسی جگہ یا پچھری کے اوقات سے پہلے اپنا پیچھے یا بروز تعطیل پیروی کرنے کے ذمہ دار نہ ہونگے اور مقدمہ پچھری کے علاوہ کسی اور جگہ ساعت ہونے یا بروز تعطیل یا پچھری کے اوقات کے آگے پیچھے پیش ہونے پر مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا جمانہ کے واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہونگے۔ مجھ کو کل ساختہ پرداخت صاحب موصوف مثل کردہ ذات منظور و مقبول ہوگا اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی اپیل انگریزی و ہر قسم درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کرائے اور ہر قسم کاروبار وصول کرنے اور داخل کرنے اور ہر قسم کے بیان دینے اور اس پر ثالثی دراضی نامہ و فیصلہ برحلف کرنے اقبال دعویٰ دینے کا بھی اختیار ہوگا اور بصورت جانے بیرونجات از پچھری صدر اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم امتناعی یا قرقی یا گرفتاری قبل از گرفتاری و اجراءے ڈگری بھی صاحب موصوف کو بشرط ادا کی علیحدہ جمانہ پیروی کا اختیار ہوگا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار حاصل ہوگا کہ مقدمہ مذکور یا اس کے کسی جزو کی کاروائی کے یا بصورت اپیل کسی دوسرے وکیل کو اپنے بجائے یا اپنے ہمراہ مقرر کر دوں اور ایسے وکیل کو بھی ہر امر میں وہی اور ویسے اختیارات حاصل ہونگے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ جو کچھ ہر جانہ التوا پڑے گا وہ صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی پیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

مورخہ: 29 / 05 / 23

دن مہینہ سال

نوٹ: اس وکالت نامہ کی ذمہ داری نا قابل قبول ہوگی۔

Accepted

لہذا وکالت نامہ لکھ دیا ہے کہ سند ہے۔  
مکمل وکالت نامہ من لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

She - 9 -

خالدہ بی بی صاحبہ صاحبہ ضابطہ ایبٹ آباد