

BEFORE THE KHYBER PAKHTUNKHWA SERVICE

TRIBUNAL PESHAWAR

1747/23

Shabnam Naz D/O Younas Khan G.Gms Jhangra
(SST)

Service Appeal No: 1747/23

VERSUS

SECRETARY ELEMENTARY & SECONDARY EDUCATION KPK & OTHERS

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Dated: 16-11-2023

Appellant

Through counsels,

Imran Younas Khan Tanoli

Advocates, Peshawar High
court Abbottabad.

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

CHECK LIST S.A. NO 1747/23

Case Title: Shabnam Naz D/o Younas Khan.

S#	CONTENTS	Yes	No
1.	This Appeal has been presented by		
2.	Whether counsel / appellant / respondent / deponent have signed the requisite document?		
3.	Whether appeal is within time?		
4.	Whether appeal enactment under which the appeal is filed is mentioned?		
5.	Whether enactment under which the appeal is filed is correct?		
6.	Whether affidavit is appended?		
7.	Whether affidavit is duly attested by competent oath commissioner?		
8.	Whether appeal / annexure are properly paged?		
9.	Whether certificate regarding filling any earlier appeal in the subject, furnished?		
10.	Whether annexures are legible?		
11.	Whether annexures are attested?		
12.	Whether copies of annexures are readable/ clear?		
13.	Whether copies of appeal is delivered to AG/ DAG?		
14.	Whether Power of Attorney of the counsel engaged is attested and signed by Petitioner/ Appellant/ Respondents?		
15.	Whether number of referred cases given are correct?		
16.	Whether appeal contains cutting / overwriting?		
17.	Whether list of books has been provided at the end of the appeal?		
18.	Whether case relate to this Court?		
19.	Whether requisite number of spare copies are attached?		
20.	Whether complete spare copy is filed in separate file cover?		
21.	Whether addresses of parties given are completed?		
22.	Whether index filed?		
23.	Whether index is correct?		
24.	Whether security and process fee deposited? On _____		
25.	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rule 1974 rule 11, Notice along with copy of appeal and annexure has been sent to respondents? On _____		
26.	Whether copies of comments / replay/ rejoinder submitted? On _____		
27.	Whether copies of comments / replay/ rejoinder provided to opposite party? On _____		

It is certified that formalities /documentations as required in the above table, have been fulfilled.

Name:- *Imran Younas Tanzeel Admate,*
Counsel for Appellant
Signature:- *[Handwritten Signature]*
Dated:- *16-11-2022*

2

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR

S.A. NO 1747/23

Shabnam Naz D/o Younas Khan Abbottabad
.....Appellant

Versus

Secretary Elementary and Secondary Education KPK Peshawar & others

SERVICE APPEAL

Diary 9259
Dated 20-11-23

APPLICATION FOR PERMISSION TO FURTHER DOCUMENTS/PLACE ON RECORD NECESSARY DOCUMENTS PERTINING TO THE INSTANT APPEAL.

Respectfully Sheweth;

1. That instant appeal titled above has been filed before the Hon'ble Tribunal.
2. That the appellant seeks permission to place on record of the instant case following documents.
 - a. Recommendation of the KPK PCS regarding appointment of Appellant as SET/SST as first batch and others.
 - b. Order of the regularization (Act 2009), of the service of respondents (female).
 - c. First page of the service appeal before the prayer be corrected of the clerical mistake as Act 2009 promulgated on 24-10-2009 instead of 24-08-2009 and annexure "C" instead of "A".
 - d. Application for Provision of necessary record from the department according to RTI.
3. That the documents mentioned above are necessary documents for the just fair decision of the case.

It is therefore prayed the appellant may graciously be allowed to further documents/place on record necessary documents for pertaining to instant appeal.

Dated:16-11-2023

Through

Appellant


Imran Younas Khan Tanoli
Advocate, Peshawar High Court
Abbottabad



No. NWFP/PSC/SR-II 39215

Date 12 / 8 / 2009

To

The Secretary to Govt of NWFP
Secondary & Elementary Education
Department Peshawar.Subject: RECRUITMENT OF FEMALE SETs (B-16) (EARTH QUAKE QUOTA) ADVT: NO. 01/2009
Sir.

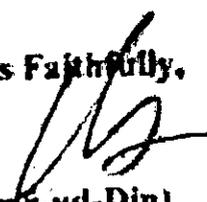
I am directed to refer to our letter No. SO(S)3-2/2007/Req dated 23.10.2008 on the subject noted above and to state that the Commission recommends the following candidates to the Government for appointment:-

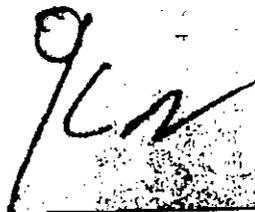
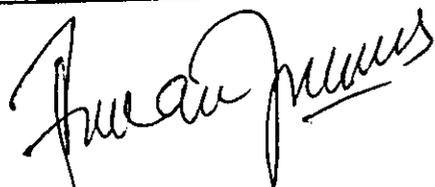
S.No.	Merit Order	Name with Father's Name	Priority District
✓ 1.	23	✓ Ayesha Siddiqua D/O Pir Zaman Shah	Battagram
✓ 2.	02	✓ Asiya Bibi D/O Syed Gulzar Shah	Manshra
✓ 3.	01	✓ Fozia Khushal D/O Khushal Khan	Abbottabad
✓ 4.	36	✓ Bibi Huiquis Begum D/O Sher Bahadar	Battagram
✓ 5.	03	✓ Miss Nabila Nawaz D/O Muhammad Nawaz	Manshra
✓ 6.	04	✓ Farhat Jubeen D/O Abdul Khaliq Awan	Abbottabad
✓ 7.	05	✓ Nighat Bibi D/O Muhammad Khan	Manshra
✓ 8.	06	✓ Zaineb Bukhari D/O Syed Inayatullah Shah	Manshra
✓ 9.	07	✓ Asma Ghaffar D/O Abdul Ghaffar Khan	Abbottabad
✓ 10.	09	✓ Saima Noreen D/O Chan Muhammad	Abbottabad

2. Recommendation in favour of the recommendees are provisional subject to passing the prescribed medical test.

3. Original applications (with enclosures) of the above recommendees are enclosed for your record. Please acknowledge receipt.

Yours Faithfully,


(Israr-ul-Din)
Deputy Secretary-I

OFFICE OF THE DIRECTOR ELEMENTARY & SECONDARY EDUCATION NWFP PESHAWAR
APPOINTMENT ORDER

Consequent upon the recommendation/Selection by the NWFP, Public Service Commission, the competent authority has been pleased to appoint the following candidates (Earth-quake) against the post of SST SO/II B-14 plus usual allowances as admissible under the rules on regular basis but without pension & gratuity with immediate effect under the provision of Establishment, & Administration Department circular bearing No.SOR-6 (E&AD)-13/2005 dated 10-8-2005 and they are further adjusted as under:-

S.NO	NAME	ZONE	DISTRICT	PLACE OF POSTING
1	Mst: Aysha Siddiq D/O Pir Zaman Shah (Lato) Now, Kaghon Flour Mill, Mohallah upper Channal, Manshora	V	Battagram	GGHS, Kaghon, Manshora SST (Sc.)
2	Mst: Asiya Bib D/O Syed Gulzar Shah C/O Shah Baba General Store Naar GPO Manshora	V	Manshora	GGHS, Oghl Manshora SST (Sc.)
3	Mst: Fozia Khushal D/O Khushal Khan Teh: & District A-Abad PO Sherwan, Village Pathnot.	V	A-Abad	GGHS, Sherwan A-Abad SST (Sc.)
4	Bibi Bilquis Begum D/O Sher Banadir Village & P.O Kuzabanda Teh: & District Battagram C/O Fida Muhammad Mob: No.03018129012	V	Battagram	GGHS, Banian Battagram SST (Sc.)
5	Miss Nabila Nawaz D/O Muhammad Nawaz Village & PO Tarangl Bala, Manshora	V	Manshora	GGHS, Shinkiri Manshora SST (Sc.)
6	Mst: Farhat Jabeen D/O Abdul Khaliq Awan H.No.G-1, P/Colony S.No.1 KTS Haripur	V	A-Abad	GGHS, Tolkan Haripur SST (Sc.)
7	Mst: Nighat Bibi D/O Muhammad Khan C/O Indus Modcos Al Mumtaz Plaza near Qurashi Petrol Pump Supply, Abbottabad	V	Manshora	GGHS, Hajl Gali A-Abad SST (Sc.)
8	Mst: Zainab Bukhari D/O Syed Inayatullah Shah Mohallah Naggazi near Zlarat Manshora	V	Manshora	GGHS, Shamdarha Manshora SST (Sc.)
9	Mst: Asma Ghaffar D/O Abdul Ghafar Khan Vill: Juhna P/O Chamhathl Via Manshora A-Abad	V	A-Abad	GGHS, Phulgran A-Abad SST (Sc.)
10	Mst: Saima Noreen D/O Chan Muhammad Vill: & PO Sherwan Khurd, Abbottabad	V	A-Abad	GGHS, Pind Kargu Khan A-Abad SST (Sc.)

TERMS & CONDITIONS OF THEIR APPOINTMENTS

- 1- Their services will be considered as regular but without pension/gratuity in term of Section 19 of the NWFP, Civil Servant Act 1973 as amended vide NWFP, Civil Servants (Amendment) Act 2005. They will however be entitled to Contributory Provident Fund (C.P.Fund) in such a manner and at such rate as may be prescribed by the Govt.
- 2- Their services will be liable for termination on one month's prior notice from either side. In case of resignation without prior notice their one month pay/allowances will be forfeited to Govt.
- 3- The appointees should join their posts within one month after the issue of this Notification.
- 4- The Executive Distt: Officer.(Elementary & Secondary Education) concerned would furnish a certificate to the effect that the candidate has joined the post or otherwise after one month of the issue of this Notification, failing which their candidature will expire automatically and no subsequent appeal etc shall be entertained.
- 5- They would be on probation for a period of two years, extendable for another one year.
- 6- They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 7- Their services can be terminated at any time, in case their performance are found unsatisfactory during probationary period. In case of misconduct, they will be proceeded against under the NWFP, Removal from service (Special Powers) Ordinance 2000 and the Rules framed from time to time.
- 8- Charge report should be submitted to all concerned.
- 9- They will be required to furnish copies of all their certificates/degrees along with the original receipts and photocopies thereof pertaining to the verification fee to the concerned Examining body (Board/University), to the Executive District Officer Elementary & Secondary Education concerned
- 10- Their pay should not be released before verification of documents/degrees.
- 11- No TA/DA will be allowed to the appointees for joining their duty.

DIRECTOR
ELEMENTARY & SECONDARY EDUCATION
N.W.F.P. PESHAWAR

Endst: No. 1970-2001 / F.No.A-17/SET(F)PSC-2009 Dated Peshawar the 2/12/2009.

- 1- PS to Secretary to Govt: of NWFP Elementary & Secondary Education Department Peshawar.
- 2- Secretary to NWFP, Public Service Commission.
- 3-5. Executive District Officer Elementary & Secondary Education, Abbottabad, Manshora, Battagram
- 6-8. District Account Officer, Abbottabad, Manshora, Battagram
- 9-19 Principal/Headmistress concerned
- 20-30. Candidate concerned/Mistress concerned
31. PA to Director of Elementary & Secondary Education NWFP, Local Office

Full ac

2/12/2009

**Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar**

PH No. 001-9210389, 9210938.
9210437, 9210957, 9210468
Fax 091-9210936
E-mail decepkp@yahoo.com



J. Khan

Notification.

Consequent upon the recommendation of the Khyber Pakhtunkhwa Service Commission, appointment of the following candidates is hereby ordered against the post of Secondary School Teacher Female (SST General) in DPS-16 (Rs.10000-000) plus usual allowances as admissible under the rules on regular basis under the existing provision of the Provincial Government, in Teaching Cadre on the terms and conditions given below with immediate effect and their Services are placed at the disposal of EDO(L&ST) concerned for further posting against vacant SST General posts:-

S.#	Name	Father's Name	Domicile	Zone	Permanent Address	Place of posting
1	Ambreen Jilani	Saifur Rehman	Mardan	2	VPO Takkar Moh: Gujran Tehsil Takht Bhai, Mardan	Services placed at the disposal of EDO (E&SE) Mardan for further posting against vacant SST General post.
2	Nighat	Said Karim	Mardan	2	Irum Colony, Nowshera road Mardan	Do.
3	Saima Anwar	Anwar Shah	Nowshera	2	Vill: Azakhel Bala Tehsil & Distt: Nowshera	Services placed at the disposal of EDO (E&SE) Nowshera for further posting against vacant SST General post.
4	Irum Butt	Aftab Ahmad Butt	Peshawar	2	H.# 90, Street, 7, Sector K-2, Phase 3, Hayatabad Peshawar	Do.
5	Saima	Mudaser Shah	Swabi	2	Moh: Gul Bahar Tehsil & Distt: Swabi	Services placed at the disposal of EDO (E&SE) Swabi for further posting against vacant SST General post.
6	Ayesha Hashim	Muhammad Hashim Khan	Battagram	3	VPO Bantan Tehsil & Distt: Battagram	Services placed at the disposal of EDO (E&SE) Battagram for further posting against vacant SST General post.
7	Rashida Rahim Baig	Rahim Baig	Chitral	3	PO Chitral Tehsil & Distt: Chitral Vill: Seenlasht	Services placed at the disposal of EDO (E&SE) Dir Upper for further posting against vacant SST General post.
8	Najma Noureen	Syed Saeed Jan	Dir Lower	3	Vill: Mian Banda Timergara PO & Tehsil Timergara Dir Lower	Services placed at the disposal of EDO (E&SE) Dir Lower for further posting against vacant SST General post.
9	Afssar ul Bejum	Amir Gul	Malakand Agency	3	Vill: Muqam Kali PO Ghawar Kali	Do.

J. Khan

Appointment Order No 12 SST (G) Advt No 1/2009

10	Sreema Nabi	Huzrat Nabi	Malakand Arjangan	1	Saklu Kot, Dargal Malakand Vill, Kharkul PO Dargal Tehsil Dargal Distt. Malakand	
11	Ruhaf Naz	Inayat Ullah	Shangla	3	VPO Chawga Moh Ali Dist Tehsil Purren Shangla	Services placed at the disposal of EDO (L&SE) Shangla for further posting against vacant SST General post
12	Rizwana Saad	Sad Ullah Khan	Lakki Marwat	4	Vill; Daraki Alam Shah Khal PO Ghorat Naurang Lakki Marwat	Services placed at the disposal of EDO (L&SE) Lakki Marwat for further posting against vacant SST General post
13	Shahnaz Naz	Muhammad Younas Khan	Abbottabad	5	VPO Jhangra Tehsil & Distt: Abbottabad	Services placed at the disposal of EDO (L&SE) Abbottabad for further posting against vacant SST General post
	Ume Laila Afsar Khan	Muhammad Afsar Khan	Abbottabad	5	Mirpur Musa Zal Colony Abbottabad	- Do -
15	Sahira Mughal	Muhammad Mughal Khan	Mansehra	5	VPO Shahal Najaf Khan Moh: Maldan Tehsil Balakot Distt: Mansehra	Services placed at the disposal of EDO (L&SE) Mansehra for further posting against vacant SST General post

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District Education Officer
(Female) Abbottabad

Terms and conditions:-

- Her services will be considered regular but without Pension & Gratuity in terms of Section-19 of the NWFP Civil Servant Act, 1973 as amended vide NWFP Civil Servants (Amendment) Act, 2005. She will however be entitled to Contributory Provident Fund in such a manner and at such rates as prescribed by the Govt.
- In case, she is already in Government: service and working against pensionable post on regular basis before 1st day of July 2001, without any service break, on application to Khyber Pakhtunkhwa Public Service Commission through proper channel and selected by the Commission, is appointed and allows choice of option either to retain benefit of pension & gratuity as allowed to her under her previous term of appointment or to avail the benefit of Contributory Provident Fund allowed to her under new appointment.
- Her service is liable to termination on one month's notice from either side. In case of resignation without notice her one-month pay/allowances shall be forfeited to the Government.
- She should join her post within 30 days of the issuance of this notification. In case of failure to join her post within one month of the issuance of this notification, her appointment will expire automatically and no subsequent appeal etc shall be entertained.
- She should be on probation for a period of one year extendable for another one year.
- She shall be governed by such rules and regulations as may be issued from time to time by the Govt.
- Her service can be terminated at any time, in case her performance is found unsatisfactory during probationary period. In case of misconduct, she shall be proceeded under the rules framed from time to time.

Her report should be submitted to all concerned.

All concerned would furnish a certificate to the effect that the candidate has joined the post within one month of the issue of her posting order.

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The priority shall be maintained as determined by the Commission.

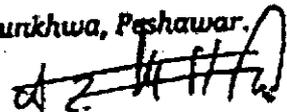
LE No TA/DA will be allowed to the appointee for joining her duty.

(Muhammad Rafiq Khattak)
Director -
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

Endst: No. 315-22 / File No. 2/A-17/SST(F) Genral /PSC/ Apptt: Dated Peshawar the 24/11/2022

Copy forwarded for information and necessary action to the: -

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


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

16/11/2022
4/11/2022



OFFICE OF THE DIRECTOR ELEMENTARY & SECONDARY EDUCATION NWFP PESHAWAR

NOTIFICATION

The competent authority has been pleased to regularize the services of the following adhoc/contract employees against the post of SST (Female) (BPS-16) with effect from 01-01-2009, under the NWFP, Employees (Regularization of Services) Act, 2009 on the terms and conditions give at the end of this Notification.

S.No	Name of candidate	Father's Name	Present Station	Date of Last Appointment Order
PESHAWAR				
1.	Amnid Anjum	Asif Khan	GGHS Budhni	5139-5197 25-11-2008
2.	Nusheen Akhtar	Akhtar Ali	GCMS Charpariza	5139-5197 25-11-2008
NOWSHERA				
3.	Khawaga	Shamsher	GGHS Mohib Banda	5139-5197 25-11-2008
4.	Shandana	Faqir Mohammad	GGMS Zara Maina	5139-5197 16-9-2008
5.	Asma Haneef	Mohammad Haneef	GGCMS Mandori	5139-5197 16-09-2008
6.	Kiran Shahzadi	Mian Baheer Shah	GGHS Spin Khak	5139-5197 25-11-2008
7.	Irum Niaz	Pir Mohammad	GGHS Nowshera Cantt	5139-5197 25-11-2008
8.	Shakeela Naz	Mir Rahman	GGHS Bara Banda	5139-5197 25-11-2008
9.	Nusrat Shaheen	Ghulam Qadir	GGHS Iwari	5139-5197 16-09-2008
10.	Nazia Habib	Habibullah	GGHS Pabbi	5139-5197 25-11-2008
CHARSADPA				
11.	Fahmeeda	Sheh Mohammad	GGHS Palangani	5139-5197 16-09-2008
12.	Robina Yousaf	Yousaf Khan	GGMS Ganderi	5139-5197 16-09-2008
13.	Bibi Halcema	Shahzad	GGHS Boobak	5139-5197 16-09-2008
14.	Roohi Bano	Fazle Rabbani	GGHS Nisatta	5139-5197 16-09-2008
15.	Toushiba Naz	Gul Faraz	GGHSS Harichand	5139-5197 16-09-2008
16.	Fouzia Naz	Farmanullah	GGHSS Harichand	5139-5197 25-11-2008
17.	Shaista Zeb	Mohammad Saib	GGHS Shodag	5139-5197 25-11-2008
18.	Seema Gul	Jan Nisar	GGHS Jamroz Khan Kalay	5139-5197 25-11-2008
19.	Rani Gul	Jan Mohammad	GGHS Doschra	5139-5197 25-11-2008
20.	Menhas Yousaf	Yousaf Khan	GGHS Mandani	5139-5197 16-09-2008
21.	Saima Gul	Anwar Khan	GGHS Shah Akzal Abad	5139-5197 25-11-2008
22.	Naheed Akhtar	Saif Ur Rahman	GGHS Shah Akzal Abad	5139-5197 25-11-2008
23.	Fatima Bibi	M. Hashmat Ali	GGHS Doulat Pura	5139-5197 25-11-2008
24.	Najma Haq	Z. Haq Haq	GGHS Kot Baba Tangay	5139-5197 16-09-2008
25.	Shahnaz Kousar	Rahmat Ullah	GGHS Doulat Pura	5139-5197 25-11-2008
26.	Ambareen Majeed	Abdul Majeed	GGMS Ghari Abulullah	5139-5197 25-11-2008
27.	Nargis Saba	Riaz Khan	GGCMS Teshanith	5139-5197 16-09-2008

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66
1/10/09
3 (SST)
E

201.	Nighat Zaman	Muhammad Zaman	GGCMS No. 1	5139-5197 16.9.08
202.	Noshaba Gul	Rehmat Din	GGHS Noordi	5139-5197 25.11.08
203.	Nighat Bibi	Malik Rustam	GGMS Mallah Soha	5139-5197 25.11.08
204.	Roohi Bano	Gulzar Shah	GGHS Pind Kamal Khan	5139-5197 25.11.08

205.	Rubina Almas	Dil Pazeer	GGMS Pind Muneem	5139-5197 16.9.08
206.	Javeria Irshad	Muhammad Arshad	GGHS Serai Niaqat Khan	5139-5197 25.11.08
207.	Atika Gul	Malik Mazhar	GGMS Sherwal	5139-5197 16.11.09
208.	Gul Rehana	Aurangzeb	GGMS Sirikot	5139-5197 16.9.08
209.	Sadia Masroor	Masroor Hussain	GIMPS Vijjian	5139-5197 16.9.09
210.	Ayesha Noreen	Muhammad Yousaf	GGHS Kahal	5139-5197 16.9.08
211.	Noreen Bibi	Ali Gohar	GGHS Dingi	5139-5197 16.9.08

MANSEHRA

212.	Kalsoom Shakir	Irshad Shakir	GGHS Darban	No.1876-88 24-10-08
213.	Amina Begum	Muhammad Parvez	-do-	5139-5197 16-09-08
214.	Faiza Tabassam	Muhammad Younis	-do-	5139-5197 16-09-08
215.	Nadia Nisar	Nisar Ahmad	GGHS Trangri Bala	5139-5197 16-09-08
216.	Saima Noreen	Muhammad Anwar	GGHS Mangloor	5139-5197 25-11-08
217.	Tanzeela Lohdi	Siddique Lodhi	GGHS Dhodial	5139-5197 16-09-08
218.	Adila Chand	Muhammad Aslim	GGHS Shamdhra	5139-5197 25-11-08
219.	Runi Javeria	Muhammad Zahoor	GGHS Shinkiri	5139-5197 16-09-08
220.	Shazia Ghaffar	Abdul Ghafar	GGHS Talhata	5139-5197 16-09-08
221.	Shamshad Bano	Noor Aslam	-do-	5139-5197 16.9.08
222.	Shabana Azeem	Muhammad Azeem	GGHS GGHS	5139-5197 25-11-08
223.	Phool Bibi	Sardar Shah	GGHS Behali	5139-5197 25.11.08
224.	Bibi Sajida Parveen	Muhammad Aslam	GGHS Afzal Abad.	5139-5197 16-09-08
225.	Chaman Ara	Maqbool ur Rehman	GGHS Kaghan	5139-5197 16.9.08
226.	Bibi Abida	Muhammad Manzoor	-do-	5139-5197 16.9.08
227.	Haleema Shahzadi	Abdur Razaq	GGHS Parhina	5139-5197 16-09-08
228.	Bibi Kalsoom	Mehboor ur Rehman	-do-	5139-5197 16-09-08
229.	Nazia Manzoor	Muhamma Manzoor	-do-	5139-5197 16-09-08
230.	Rahela Anwar	Anwar Khan	-do-	1876-88 24-10-08
231.	Melnaz Shah	Salamat Shah	GGHS Hassa	5139-5197 16-09-08
232.	Fehmina Hina Lodhi	Abdul Hannan Lodhi	GGHS Tassa Nawab.	5139-5197 25-11-08
233.	Amber Jabeen	Muhammad Ajeem Khan	GGHS Atarshisha	5139-5197 25.11.08
234.	Safina Zaman	Ali Zaman	JICA Model Phutra	5139-5197 16-09-08

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11/12/08

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235.	Samina Naz	Muhammad Irfan	GGCMS Paqir Abad.	5139-5197 25-11-08
236.	Dur-E-Saim	Muhammad Hussain	GGCMS Khulhaary	5139-5197 16-09-08
237.	Abida Zeb SST	Chian Zeb	GGCMS Charah	5139-5197 25-11-08
238.	Barseela Zeb	Aurangzeb	GGMS Thalhi Khurd	5139-5197 16-09-08
239.	Gul Bibi	Haji Akbar	GGMS Chinarkot	5139-5197 25-11-08

240.	Shaista Malik	Muhammad Miskaan	GGMS Mang	5139-5197 25-11-08
241.	Naila Gul	Sarfraz	GGMS Madserian	5139-5197 25-11-08
242.	Nadia Jadoon	Muhammad Younis	GGMS Paras	5139-5197 25-11-08
243.	Bibi Saima	S.Nazir Ahmed Shah	GGMS Morat Mera	5139-5197 25-11-08
244.	Saeeda Bibi	Q.Zaidul Haq	GGMS Ahl	5139-5197 16-9-08
245.	Faiza Tabassum	Muhammad Hamyum	GGMS Agla Gran.	5139-5197 25-11-08
246.	Shazia Nasreen	Abdul Jafil	GGMS Bandgesuch	5139-5197 16-09-08
247.	Naima Sultana	Aminul Haq	GGMS Bajmang.	5139-5197 16-09-08
248.	Sultana Bibi	S.Mehmood Shah	GGMS Hassarai	5139-5197 16-09-08
249.	Zuhra Bibi	Abdul Aziz	GGMS Mahandri	5139-5197 16-09-08
250.	Shaista Bibi	Isa Khan	GGMS Manda Buch	5139-5197 5139-5197 16-09-08
251.	Sadaq Qurat-ul Ain	Atta Muhammad	GGMS Sandasar	5139-5197 16-09-08
252.	Shahida Parveen	Abdul Ghani	GGMS Sangar	5139-5197 16-09-08
253.	Bibi Rabia	Muhammad Fareed	GGMS Maazullah	5139-5197 16-09-08
254.	Humera Gul	Muhammad Daud	GGMS Parian	5139-5197 16-09-08
255.	Aisha Hujna	Ghulam Muhammad	GGMS Bandi Saddiq	5139-5197 16-09-08
256.	Sumera Iqbal	Muhammad Iqbal	GGMS Bai Bkajna	5139-5197 16-09-08
257.	Sumera Bibi	Muhammad Parvaiz	GGMS Bhutto Band	5139-5197 16-09-08
258.	Amreena	Muhammad Saleem	GGMS M.B.Kalan	5139-5197 16-09-08
259.	Takia	Muhammad Muskeen	GGMS Nara Doga	5139-5197 16-09-08
260.	Afshan Faiz	Muhammad Faiz	GGMS Sawan Mera	5139-5197 25-11-08
261.	Samina Gul	Mahizer Khan	GGMS Tarwara	5139-5197 16-9-08
262.	Kalsoom Bibi	Muhammad Ishafaq	GGMS Jisgran	5139-5197 16-09-08
263.	Mehmooona Malik	Muhammad Zubair	GGMS Jehangian	5139-5197 25-11-08
264.	Samina Shahzadi	Taus Khan	GGMS Gali Badral	5139-5197 16-09-08
265.	Aisha Banaras	Muhammad Baparas	GGMS Kawai	5139-5197 25-11-08
266.	Javeria	Ghulam Jalani	-do-	5139-5197 25-11-08
267.	Bibi Mehtab	Naimatullah	-do-	5139-5197 16-09-08
268.	Nighat Rabani	Ghulam Rehman	GGMS L/Nawab	5139-5197 25-11-08

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269.	Gulnaz		GGMS Ranikot	5139-5197 25-11-08
270.	Tasleem Yasceen		GGHS Hassan	5139-5197 25-11-08

BATTAGRAM				
271.	Qamarun Nisa	Muhammad Hasham	GGHS Bania	5139-5197 16/09/08
272.	Bibi Alyia	Muhammad Hasham(K)	GGHS Bania	5139-5197 16/09/08
273.	Bibi Fatima	Muhammad Fayaz	GGHS Battagram	5139-5197 16/09/08
274.	Sumaira	Noor-ul-Huda	GGHS T.Kharari	5139-5197 16/09/08
275.	Zakia Khan	Muhammad Khan	GGMS Kuza Banda	5139-5197 16/09/08
276.	Nighat Shahna		GGMS Thakote	5139-5197 16/09/08
277.	Shahzia Bibi	Hafiz-ur-Rehman	GGMS Arghashori	5139-5197 16/09/08
278.	Javaria Sakhi	Sakhi Muhamma Tanoli	GGHS Bania	5139-5197 25/11/08
279.	Sajida Sakhi	Sakhi Muhamma Tanoli	GGHS T.Kharari	5139-5197 25/11/08

KOHISTAN				
280.	Asifa Bibi	Muhammad Manzoor	GGMS Chackai	1876-88 24/10/08
281.	Farzana Sunum		GGMS Goli Bagh	1876-88 24/10/08
282.	Sughra Bibi	Muhammad Maskeen	GGHS Dassu Kaloni	1876-88 24/10/08

KARAK				
283.	Shagufta Naz	Abdur Rais	GHSS T/Nasrali	5139-5197 25/11/08
284.	Mehnaz Pari	Hamid Ullah	GGMS Tanga Zanai	5139-5197 16/9/08
285.	Zahida Parveen	Mu Qabiz Khan	GGHS Rahmat Abad	5139-5197 16/9/08
286.	Farida Khanum	W/O Ashraf	GGHS Ghundi Kiila	5139-5197 16/9/08
287.	Hussan Bano	Fateh Jang	GGHS Bogara	5139-5197 16/9/08
288.	Binafshad Shaheen	Gul Shahin Shah	GGHS Bogara	5139-5197 16/9/08
289.	Afsar Parveen	Umar Hassan	GGHS Tarki Khel	5139-5197 16/9/08
290.	Musarrat Pari	Rahim Badshah	GGHS Bazid Khel	5139-5197 16/9/08
291.	Fazilat Pari	Anwar Ghani	GGHS Bazid Khel	5139-5197 16/9/08
292.	Robina Shahnaz	Sheer Dad Khan	GGHS Mitha Khel	5139-5197 16/9/08
293.	Tilat Noureen	Allah Yar Gul	GGHS Nari Panos	5139-5197 16/9/08
294.	Samin Khattak	Muhammad Akbar	GGHS Nari panos	5139-5197 16/9/08
295.	Aisha Gul	Maula Jan	GGHS Esak Chountra	5139-5197 16/9/08
296.	Baseerat Begum	W/O Shohab Ullah	GGHS Bahader Khel	5139-5197 16/9/08
297.	Shazia Begum	M. Aslam Khattak	GGCMS Tater Khel	5139-5197 16/9/08
298.	Ulfat Ayub	Ayub Khan	GGMS Khawaja Khel	5139-5197 16/9/08
299.	Rukhsana Yasmin	Sar Gul Khan	GGMS Zara Gandhi	5139-5197 16/9/08
300.	Shazia Rahim	Abdur Rahim	GGMS Totaki	5139-5197 16/9/08
301.	Musarrat Shaheen	Ilam Dad	GGHSS Chokara	5139-5197 16/9/08

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TERMS & CONDITIONS OF HER APPOINTMENT

- 1- Their services will be considered as regular but without pension & gratuity in terms of Section-19 of the NWFP, Civil Servants Act, 1973 as amended vide NWFP, Civil Servants (Amendment) Act, 2005. They will, however, be entitled to contributory Provident Fund in such a manner and at such rates as prescribed by the Government.
- 2- Their seniority will be determined according to Section-4 of the NWFP, Employees (Regularization of Services) Act, 2009.
- 3- They will be required to furnish copies of all their certificates / degrees along with original receipts and photo stat copies thereof, pertaining to the verification fee of the concerned Examining body (Board & University) to the EDOs (E&SE) concerned
- 4- The EDOs (E&SE) concerned are directed not to release their pay until the verification of their documents.

DIRECTOR

Endst: No. 2472-3056 /F.No.A-17/SET(F) Contract- Appoint:2009 Dated Peshawar the 11/12/2009.

- 1- PS to Minister for Elementary & Secondary Education NWFP, Peshawar
- 2- PS to Secretary to Govt: of NWFP, E&SE, Department Peshawar.
- 3- Executive District Officers Elementary & Secondary Education concerned are
- 4- District Account Officer concerned.
- 5- Candidate concerned/Mistress concerned
- 6- PA to Director of Elementary & Secondary Education NWFP, Local Office.

[Signature]
 Deputy Director (Establishment)
 Elementary & Secondary Education NWFP, Peshawar
 11/12/2009

[Signature]

ASMAT
2009/12/12

(4) (2)

malafide, illegal against section 4 of KPK (regularization of service) Act 2009 and against the Judgment of Supreme Court of Pakistan Dated 02-06- 2022; Hence in effective upon the rights of the appellant. That the first batch of the SST consisting of 10 candidates were recommended by the KPK (Public Service Commission) on 24-08-2009 (annexed as annexure "C") which is prior to the commencement of KPK (regularization of service) Act 2009 promulgated on 24-10-2009, Hence the appellant ranks senior in service over the employees initially appointed on Adhoc Basis & later on regularized in service (respondent No 4 to respondent No 626).

PRAYER: On acceptance of instant service appeal, the Honorable court may graciously be pleased to pass the order as under:

- a. Declaration to the effect the impugned seniority list of SST updated with on 31-12-2022 issued by respondent No 2 whereby SST initially appointed on Adhoc basis in the year 2006, 2007, 2008 and were later on regularized on 24-10-2009 (respondent No 4 to respondent No 626) under KPK (regularization of service) Act 2009 have been given seniority over the appellant who was appointed on the recommendation of KPK Public Service Commission is wrong, incorrect, against law and facts, discriminatory, void ab-intio, misuse of authority, malafide, Illegal, against

To

Directorate of Elementary & Secondary Edu
K.P.K. Peshawar.

Subject: Request for provision of ^{order} Seniority
List SST Female 31-12-2022 according
to R.T.I.

Respected Sir,

With great respect it is stated that
seniority of SST on line has been filed
before the Service Tribunal K.P.K. Peshawar
Institution branch has raised objections
to provide seniority list of SST Female
stood on 31-12-2022 and orders

True

It is therefore requested before the
competent authority to provide the
seniority list according to R.T.I well
in time please.

Thanks

884
21-8-23

Dated: 21-08-2023

Rbi Call No 0331 9099923
ID No 18701-0351516-8

Yours sincerely
Shehbaz Ali SST
G.M.S Tarora
Abbottabad.

To

Chairman,
Public Service Commission
K.P.K. Peshawar.

(15)
D. No. 10992

Dated: 16-08-23

Subject: provision of Recommendation
Pcs order

Respected Sir,

with great respect, it is stated
that I had passed the pcs Exam
vide advertisement No 25-01-2009
for Sst (A) vide S.No 5. Dated 24-08-2009.
I have filed the Service Appeal against the
Regularized Candidates also Sst, before
the Service Tribunal Kp Peshawar, for
the Seniority of Sst.

It is therefore requested that attested/
original above mentioned order have to
Present before the Tribunal with in time,
I shall be obliged for your kindness
as provision of to record concern please
Thank

Asma Ghaffar Sst
C & C Com School AFB
Dated: 12-08-2023

Furqan