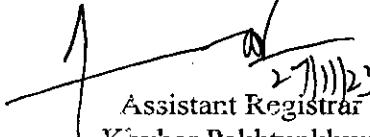


Cost of Rs. 10,000/- received in Service Appeal No. 918/2022,

Titled Saima Naz vs. Education

in the office of Assistant Registrar, Vide Order 21/07/23, Submitted Dated: 27/11/2023.


Assistant Registrar
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Before the Honorable Khyber Pakhtunkhwa Service Tribunal Peshawar Camp
Tribunal Abbottabad

SA No. 918/2022

Saima Naz.....Appellant

VERSUS

Govt: Of KPK & Others.....Respondents

PARA WISE COMMENTS ON BEHALF OF RESPONDENTS NO. 01 TO 04

INDEX

S #	Description	Page Nos	Annexures
1.	Comments along with Affidavit	01 to 05	
2.	Relevant pages of Seniority List	06 to 07	"A"
3.	Copy of working papers dated 28-08-2023	08-12	"B"
4.	Copy of letter of DPC dated 28-09-2022	13-15	"C"

DATED: ____-11-2023


 (Dr. Iqbal Khan)
 DIRECTOR

E&SE Khyber Pakhtunkhwa
 Peshawar

Before the Honorable Khyber Pakhtunkhwa Service Tribunal Peshawar Camp
Tribunal Abbottabad

SA No. 918/2022

Saima Naz.....Appellant

**Khyber Pakhtunkhwa
Service Tribunal**

VERSUS

Diary No. 9519

Govt: Of KPK & Others.....Respondents 27-11-23

PARA WISE COMMENTS ON BEHALF OF RESPONDENTS NO. 01 TO 04

Respectfully Sheweth:

Para wise comments on behalf of respondents are submitted as under:

Preliminary Objections:

1. **That this Honorable Tribunal has got nothing to do with the fitness for promotion case. In this respect a judgment reported as 2013-SCMR-99 is very much clear.**
2. That the appellant did not come to this Honorable Tribunal with clean hands. Hence, not entitled for any relief.
3. **As per Final Seniority List of SSTs (Female), the name of appellant falls at serial No. 961 and she will be considered for promotion to the post of Subject Specialist (SS) Biology BS-17 according to seniority-cum-fitness.**
4. That the appellant is estopped to sue through her own conduct.
5. That the present service appeal is not maintainable due to non-joinder and mis-joinder of necessary parties.
6. That the appellant has no cause of action to file the instant appeal.
7. That the appellant has no locus standi to file the present appeal.
8. That the present appeal has been filed to pressurize the respondents.
9. That the instant appeal is not maintainable in its present form hence, liable to be dismissed.

10. That the impugned Notification was issued on dated 14-11-2017 whereas, Departmental Appeal was preferred on 09-02-2022 and appellant did not file application regarding condonation of delay hence, departmental appeal as well as service appeal are hopelessly time barred and not maintainable and liable to be dismissed without any further proceedings.

11. That the appellant has suppressed the material facts from this Honorable Tribunal, hence, not entitled for any relief and appeal is liable to be dismissed without any further proceedings.

Factual Objections:

1. That the Para No. 01, of the Service Appeal pertains to Academic record hence, need no further comment.
2. That the Para No. 02 of the service appeal pertains to service record.
3. That the Para No. 03, of the service appeal as composed is incorrect hence, denied and not admitted. As per Final Seniority List of SSTs (Female), the name of appellant falls at serial No. 961 and she will be considered for promotion to the post of Subject Specialist (SS) Biology BS-17 according to *seniority-cum-fitness*. (Relevant pages of Seniority List are annexed as **Annexure "A"**)
4. That the Para No. 04, of the instant service appeal relates to the recruitment rules/ policy.
5. That the Para No. 05, of the instant Service Appeal pertains to the record.
6. That the Para No. 06 of the service appeal as composed is incorrect hence, denied. As per Final Seniority List of SSTs (Female), the name of appellant falls at serial No. 961 however, as per working papers vide No. 3362 dated 28-08-2023, of SST for promotion against the post of SS (Bio), 46 SSTs (Female) will be promoted as SS whereas, the name of appellant is mentioned at serial No. 02 of the said working papers and Departmental Promotion Committee is in pipeline and appellant will be promoted according to seniority cum fitness.

(Copy of working papers dated 28-08-2023 and letter of DPC dated 28-09-2022 are annexed as Annexure "B" & "C" respectively)

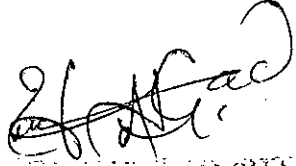
7. That the Para No. 07, of the service appeal pertains to record hence, need no further comment.
8. That the Para No. 08 of the service appeal as composed is incorrect hence, denied. As the impugned Notification was issued on dated 14-11-2017 whereas, Departmental Appeal was preferred on 09-02-2022 and appellant did not file application regarding condonation of delay hence, departmental appeal as well as service appeal are hopelessly time barred and not maintainable and liable to be dismissed without any further proceedings.
9. That the Para No. 09 of the service appeal as composed is incorrect hence, denied as departmental appeal was preferred beyond the period of limitation.
10. That the Para No. 10 of the service appeal as composed is incorrect hence, denied.
11. That the Para No. 11 of the service appeal as composed is incorrect hence, denied. As this Honorable Tribunal has got nothing to do with the fitness for promotion case. In this respect a judgment reported as 2013-SCMR-99 is very much clear.

GROUND:

1. That ground 1, of the service appeal pertains to academic as well as service record of the appellant.
2. That ground 2, of the service appeal as composed is incorrect hence, denied. Comprehensive reply has already been given in Para No. 06 of the factual objections.
3. That ground 3, denied and not admitted.
4. In reply to ground 4, of the Service Appeal is denied and not admitted. Comprehensive reply has already been given in preceding paras.
5. That ground 5, of the Service Appeal as composed is incorrect hence, denied.

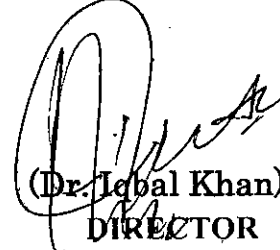
That the respondents seek leave of this Honorable Tribunal to raise additional grounds/points during the course of arguments.

It is, therefore, in the light of above stated facts and circumstances very humbly prayed that the Service Appeal in hand may please be dismissed with cost.



MOTASIM BILLAH SHAH
SECRETARY

E&SED Khyber Pakhtunkhwa
Peshawar
(Respondents No. 01 & 02)



(Dr. Iqbal Khan)
DIRECTOR

E&SE Khyber Pakhtunkhwa
Peshawar
(Respondents No. 03 & 04)

Before the Honorable Khyber Pakhtunkhwa Service Tribunal Peshawar Camp
Tribunal Abbottabad

SA No. 918/2022

Saima Naz.....Appellant

VERSUS

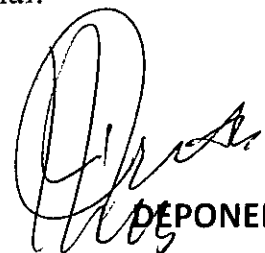
Govt: Of KPK & Others.....Respondents

PARA WISE COMMENTS ON BEHALF OF RESPONDENTS NO. 01 TO 04

AFFIDAVIT

I, Dr. Iqbal Khan Director E&SE Khyber Pakhtunkhwa, do hereby affirm and declare on oath that the contents of foregoing Comments are correct and true according to the best of my knowledge and belief and nothing has been suppressed from this Honorable Tribunal.




 DEPONENT
 Dr. Iqbal Khan
 Respon No- 3

**FINAL SENIORITY LIST OF SST (FEMALE) (GENERAL & SCEINCE) OF ELEMENTARY AND SECONDARY EDUCATION KHYBER
PAKHTUNKHWA (AS STOOD ON 31-05-2023)**

S.No	CNIC	Personal No.	Name	Father Name	Domicile	Date of Birth	Qualification	Prof Qualification	Master in Subject with Div	Year of B.Ed	Date of Ist: Apptt: in Edu:Deptt:	D/o Apptt/ Promotion to SST Post	S ETEA Merit Score	Method of recruit:	School
1	17301-7221589-8		Rehana Yasmeen	Muhammad Hussain	Peshawar	4/24/1970	MA	B.Ed	Islamiyat		3/26/1992	12/8/1994		DPC	GCGHSS Peshawar
2	15602-9891670-0		Nadia Shahzad	Shahi Rom Zat	Swat	3/3/1971	BSC	M.Ed	BSC	1994	23.5.1995	23.5.1995	17 P	DPC	GGHS Aboha
3	15302-0885694-8		Pukhraj	Mohibullah	Dir	2/3/1969	MA	B.Ed	Urdu	1992	24.5.1995	24.5.1995	17 P		GGMS Ramora Dir Lower
4			Najma Begum	Khalid Mehmood	Mardan	03.01.1965	MA	B.Ed	Urdu	1993	24.5.1995	24.5.1995	17 P	DSC	GGHSS NO.1 Mardan
5	16101-108373-4		Shazia Begum	Meher Zada	Mardan	1.1.1971	MA	B.Ed	English		24.5.1995	24.5.1995			GGHS Rashakai
6	16101-1129841-6		Asmat Ara	Abdul Qayoom	Mardan	9/1/1971	MA	B.Ed	Islamiyat	1994	24.5.1995	24.5.1995	17 P	DSC	GGHSS No.1 Mardan
7	38303-0939389-2		Tasneem Akhtar	Habib Ullah Khan	Dir Lower	11.10.1969	MA	B.Ed	Urdu (3rd Division)	1994	27.06.1990	23.03.1996	17 P	DPC	GGCMS Seh sada No. 1 Dir Lower
8	15401-0680224-2		Tabassum	Rawit Khan	Malakand	1.2.1966	MA	B.Ed	Islamiyat	1994	7.11.1991	25.3.1996			GGHS Kharkai Malakand
9	12101-7050753-4		Rubina Shaheen	Habib Ullah	D.I.Khan	4/15/1964	MA	M.Ed	Islamiyat / Urdu		4/3/1993	9/1/2003		DPC	GGCMS RUKHNOW
10	37405-1111505-0		wajida Siddiq	Atiqe-ur- Rehman Siddiqui	Haripur	4/18/1967	MA	B.Ed	Islamiyat	1990	1/10/1991	4/1/1996		DPC	GGHS Chhoi Haripur
11	17301-1201522-4		Nusrat Begum	Abdul Sattar	Peshawar	4/15/1971	MA	M.Ed	Islamiyat	1995	17.3.1992	18.2.1999			GGCMHS Nothia Peshawar
12			Rahila Azam		Tank	13.10.1972	BA	B.Ed	-		18.2.1999	18.2.1999			GGMS, Daraki Tank
13			Shahina Tabassum		Mardan	25.10.1969	BA	B.Ed	-		24.8.1994	18.2.1999			GGHS, Rashakai Nowshera
14	12103-1451165-8		Farhat Shaheen	Syed Ahmad Shah	D.I.Khan	4/3/1967	MA	M.ED	Islamiyat (3rd Div.)	1990	9/27/1986	7/12/1999			GGMS Paharpur DI Khan
15	16101-1488579-2		Rahat Bibi	Muhammad Hayat	Mardan	3/20/1967	MA	M.Ed	Urdu	1991	7/12/1999	7/12/1999		DPC	GGMS Sheikh Maltoon Mardan
16	14301-1944308-2	159509	Romana Naureen	Muhammd Ashraf	kohat	4/12/1964	M.A	M.Ed	Urdu	1993	10.01.1989	12.7.1999	17 P		GGHS Mashogagar Peshawar
17	12103-7371456-8		Musharaf Jehan	Abdul Rasul Khan	D.I.Khan	16.04.1968	MA	B.Ed	Islamiyat	1990	12.7.1999	12.7.1999	17 P		GGMS Saidallan D.I.Khan

S.No	CNIC	Personal No.	Name	Father Name	Domicile	Date of Birth	Qualification	Prof Qualification	Master in Subject with Div	Year of B.Ed	Date of Ist: Apptt: In Edu:Deptt:	D/o Apptt/ Promotion to SST Post	S ETEA Merit	Method of recruit:	School
948	15402-1386072-0		Hurmat	Dilawar Khan	Malakand	4/4/1979	MA	B.Ed	Islamiyat	2008	25/11/2008	01/01/2009			GGMS Band (Ouch) D.Lower
949	42201-0321508-0		Javaria	Ghulam Jilani	Mansehra	18/3/1979	MA	M.Ed	Pol. Science/ History	2003	25/11/2008	01/01/2009		Online	GGCMS No1 Mansehra
950	12101-8747652-0		Javaria Mehak	Abdul Rehman	D.I.Khan	12/5/1985	MA	M.Ed	Urdu	2006	25/11/2008	01/01/2009		Online	GGHS No.08 DIKhan
951	12101-9573576-0		Javaria Rehman	Sheikh Abdul Rehman	D.I.Khan	17/09/1982	M.Sc	M.Ed	Comp. Sci / Urdu	2007	25/11/2008	01/01/2009	17 P	Online	GGHS No.4 D.I.Khan
952	15402-1388542-6		Khairaza Begum	Khan Zada	Malakand	6/12/1981	MA	M.Ed	Islamiyat		25/11/2008	01/01/2009		Online	GGHS Khar Malakand
953	15201-1854550-4		Khunza Nisa	Afzal Aman	Chitral	30/12/1979	MA	M.Ed	Islamiyat	2007	25/11/2008	01/01/2009	17 P	Online	GGHS Muldeh Chitral
954	11201-0344440-4		Laila Mursaleen	Ghulam Mursaleen	Lakki Marwat	20/10/1980	MA	M.Ed	Islamiyat/ Urdu	2007	25/11/2008	01/01/2009	17 P	Online	GGHS NO.3 Lakki Marwat
955	15201-0958844-8		Maryam Bibi	Sardar Wali Khan	Chitral	5/3/1985	MA	B.Ed	Islamiyat	2009	25/11/2008	01/01/2009	17 P	Online	GGHS SINGOOR CHITRAL
956	15202-3077107-2		Mirza Kay	Sher Afas Khan	Chitral	5/3/1978	MA	M.Ed	Urdu		25/11/2008	01/01/2009	17 P	Online	ASDEO Upper Chitral
957	12201-9314460-2		Ulfat Zile-Huma	Ghulam Sarwar	Tank	28/08/1980	MA	B.Ed	Islamiyat	2005	25/11/2008	01/01/2009	17 P	Online	GGHS No.1 Tank
958	12101-011832-4		Musarat Iqbal	Muhammad Iqbal	D.I.Khan	24/11/1983	M.Sc	M.Ed	Pak: Study		25/11/2008	01/01/2009			GGMS Chah Mughal Wala DIKhan
959	15202-5202306-2		Muslima Musarrat	Ghulam Ahmad	Chitral	10/10/1986	MA	M.Ed	Islamiyat	2009	25/11/2008	01/01/2009	17 P		GGHS KOSHT CHITRAL
960	15307-6769784-2		Nargis Begum	Saeedur Rahman	Dir Lower	27/03/1982	MA	M.Ed	Islamiyat/ Pak: Study	2009	25/11/2008	01/01/2009	17 P		GGMS KHAIR ABAD Dir Lower
961	13503-7801926-0		Seima Naz	Muhammad Irfan	Mansehra	2/2/1984	M.Sc	M.Ed	Botany	2007	27/11/2008	02/01/2009	17 P		GGCMS Far Abad Mansehra
962	13302-0495969-8		Nighat Bibi	Malik Rustam Khan	Haripur	2/2/1982	MA	M.Ed	Islamiyat	2006	25/11/2008	01/01/2009			GGHSS KTS NO. 2 HARIPUR
963	15031022184-8		Nighat Rehmani	Ghulam Rehmani	Mansehra	3/10/1982	MA	M.Ed	Pol. Science/ History	2006	25/11/2008	01/01/2009		Online	GGHSS Gandhin
964	15202-6439317-4		Noor Jehan	Muhammad Yousaf	Chitral	25/04/1978	MA	M.Ed	Islamiyat		25/11/2008	01/01/2009	17 P		GGMS PARWAK CHITRAL
965	15401-0680790-8		Palwasha	Muhammad Raziq	Malakand	12/3/1980	BA	B.Ed			25/11/2008	01/01/2009		Online	GGCMS SIDRA JOWER MKD
966	12101-5711615-4		Rashda Aziz	Azizur Rehman	D.I.Khan	3/5/1976	MA	M.Ed	Pak: Study	1999	25/11/2008	01/01/2009	17 P	Online	GGHS No.4 D.I.Khan



Directorate of Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

274
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No 3362 /A-17/Seniority Appeals 2021

Dated Peshawar the 28/08/2023

To:

The Secretary,
Elementary & Secondary Education Department
Khyber Pakhtunkhwa Peshawar.

Subject: WORKING PAPER FOR PROMOTION OF SST (FEMALE) TO SUBJECT SPECIALIST(BPS-17)

Memo:

I am directed to refer to subject cited above and to enclose herewith working paper for promotion of SST. (Female) to Subject Specialist BPS-17 along with attached documents as per detail below:

S.NO.	Subject	Net to be promoted
1.	English	58
2.	Economics	60
3.	H/ Civics	56
4.	Statistics	67
5.	Pak: Study	49
6.	Islamiyat	53
7.	Maths	81
8.	Physics	97
9.	Chemistry	61
10.	Biology	46
11.	Urdu	49
12.	Pashto	26
Total		703

Therefore, it is requested that the case may be placed before Departmental Promotion Committee for consideration please.

Encl: As above.

Deputy Director Establishment (F)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.

Endst: No. _____/A-17/Seniority Appeals 2021

Dated Peshawar the 1 / 2023

Copy forwarded for information to the :-

1. PA to Director Elementary Education Khyber Pakhtunkhwa.
2. Master file.

Deputy Director Establishment (F)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT PESHAWAR.

WORKING PAPER FOR DEPARTMENTAL PROMOTION COMMITTEE.

Subject: - PROMOTION OF FEMALE SST BPS-16 TO SS BPS-17 OF VARIOUS SUBJECT AS PER
DETAIL BELOW IN ELEMENTARY & SECONDARY EDUCATION DEPARTMENT.

- 703 posts of Subject Specialist (BS-17) of following Subjects falling under the promotion quota has become vacant in the Elementary and secondary Education Department Khyber Pakhtunkhwa due to creation by Finance Department vide Notification (copies attached) as per detail given below:-

2.

DETAIL OF SUBJECT WISE DETAIL OF SANCTIONED POSTS AND OF 50% PROMOTION

S.NO.	Subject	Sanctioned Posts	Promotion @50%	Already Promoted	Net to be promoted
1.	English	302	151	93	58
2.	Economics	223	112	52	60
3.	H/ Civics	246	123	67	56
4.	Statistics	189	95	28	67
5.	Pak: Study	258	129	80	49
6.	Islamiyat	260	130	77	53
7.	Mathematics	245	123	42	81
8.	Physics	257	129	32	97
9.	Chemistry	254	127	66	61
10.	Biology	255	128	82	46
11.	Urdu	284	142	93	49
12.	Pashto	175	88	62	26
Total:-		2948	1474	771	703

(a) 50% by promotion on the basis of seniority -cum-fitness from amongst the SST teacher (BS-16) with five year service as such in column No.3

(b) 50% by initial recruitment

- According to the seniority list (Flag-) the following SST Teachers BS-16 of the Elementary & Secondary Education Department are due for promotion to the post of SS BS-17 on regular basis: There are (703) SS of the above mentioned Subject BS-17 posts are lying vacant working in Elementary & Secondary Education Department.

ISLAMIYAT

S#	SL#	Name and Qualification	Domicile	Date of Birth	D/o of Ist: Appt: as SST	Whether she has completed 05 years experience	Whether Eligible Or Not	Remarks
140	1.	Asmat Ara MA/B.Ed	Mardan	01/09/1971	24.5.1995	Yes		PER,s not provided
149	2.	Tabassum MA /B.Ed	Malakand	1.2.1966	25.3.1996	Yes		PER,s completed up to 2022
150	3.	Rubina Shaheen	D.I.Khan	15/04/1964	01/09/2003	Yes		PER,s completed up to 2022

BIOLOGY

13

S#	SL#	Name and Qualification	Domicile	Date of Birth	D/o of Ist: Appt: as SST	Whether she has completed 05 years experience	Whether Eligible Or Not	Remarks
1.	859	Munazza Ikram M.Sc/M.Ed	D.I.Khan	03/11/1983	01/01/2009	* Yes		PER,s completed up to 2022
2.	961	Saima Naz M.Sc/M.Ed	Mansehra	02/02/1984	02/01/2009	Yes		PER,s completed up to 2022
3.	973	Mussarat Jabeen MA/M.Ed	Karak	15.04.1983	01/01/2009	Yes		PER,s completed up to 2022
4.	1016	Musarat Jabeen M.Sc/M.Ed	Karak	15/04/1983	01/01/2009	Yes		PER,s not provided
5.	1076	Romana Khan M.Sc/M.Ed	Bannu	01/01/1983	01/01/2009	Yes		PER,s completed up to 2022
6.	1090	Zainab Bukhari M.Sc/M.Ed	Mansehra	25/01/1985	01/01/2009	Yes		PER,s completed up to 2022
7.	1109	Malghalarah M.Sc/M.Ed	Karak	17.11.1985	05/01/2012	Yes		PER,s completed up to 2022
8.	1111	Rafia Tareen M.Sc/B.Ed	D.I.Khan	25.02.1983	12.01.2012	Yes		PER,s completed up to 2022
9.	1112	Afshan Ali M.Phil/M.Ed	Karak	12.04.1983	02/01/2010	Yes		PER,s completed up to 2022
10.	1114	Zakia Mehboob M.Sc/M.Ed	Nowshera	30.03.1980	02.01.2012	Yes		PER,s completed up to 2022
11.	1120	Nabeela M.Sc/B.Ed	Swabi	14.03.1984	28.12.2011	Yes		PER,s completed up to 2022
12.	1121	Nabeela Gul M.Sc/M.Ed	Kohat	08.09.1985	28/12/2011	Yes		PER,s completed up to 2022
13.	1128	Shafia Zaman M.Sc/M.Ed	D.I.Khan	20.02.1980	02.01.2012	Yes		PER,s completed up to 2022
14.	1131	Nadia Begum M.Sc/M.Ed	Kohat	19.05.1984	28/12/2011	Yes		PER,s completed up to 2022
15.	1132	Nasrah Rubab M.Sc/M.Ed	D.I.Khan	27.04.1985	31.12.2011	Yes		PER,s not provided
16.	1133	Riaz Bibi M.Sc/M.Ed	D.I.Khan	10.08.1985	31.12.2011	Yes		PER,s completed up to 2022
17.	1135	Shahnaz Gul M.Sc/M.Ed	Peshawar	01.04.1984	31.12.2011	Yes		PER,s completed up to 2022
18.	1156	Sanobar Khan M.Sc/B.Ed	Kohat	23.11.1981	01.01.2012	Yes		PER,s completed up to 2022
19.	1165	Irum Khan M.Sc/M.Phil/M.Ed	Swabi	11.04.1983	31.12.2011	Yes		PER,s completed up to 2022
20.	1206	Sadia Anwar M.Sc/M.Ed	Charsadda	12.10.1981	31.12.2011	Yes		PER,s completed up to 2022
21.	1210	Nadia Noreen M.Phil/M.Ed	Charsadda	03.04.1983	31.12.2011	Yes		PER,s completed up to 2022
22.	1214	Maria Khatoon M.Sc/B.Ed	Abbottabad	01.05.1983	26.01.2012	Yes		PER,s completed up to 2022
23.	1245	Salma M.Phil/M.Ed	Mohmand Agency	27.03.1985	29/12/2011	Yes		PER,s not provided
24.	1301	Aisha Bano M.Phil/M.Ed	Mansehra	22.06.1983	05.01.2012	Yes		PER,s completed up to 2022
25.	1311	Farzana Bibi M.Phil/M.Ed	Tank	11.04.1982	28.12.2011	Yes		PER,s completed up to 2022
26.	1314	Kalsoom Azam M.Sc/M.Ed	Peshawar	05.03.1985	30.12.2011	Yes		PER,s completed up to 2022

		Name and Qualification	Domicile	Date of Birth	D/o of Ist: Appt: as SST	Whether she has completed 05 years experience	Whether Eligible Or Not	Remarks
27.	1316	Mamoona Imtiaz M.Sc/M.Ed	Charsadda	04.08.1984	28.12.2011	Yes		PER,s completed up to 2022
28.	1318	Farhat Naz M.Sc/M.Ed	Mansehra	21.11.1983	16/01/2012	Yes		PER,s completed up to 2022
29.	1382	Mehwish Zahoor M.Phil/M.Ed	Mardan	04.09.1985	31.12.2011	Yes		PER,s completed up to 2022
30.	1385	Amira Jadoon M.Sc/M.Ed	Abbottabad	22.09.1986	27.1.2012	Yes		PER,s completed up to 2022
31.	1390	Suriya M.Sc/M.Ed	Bunir	14/03/1984	30/01/2013	Yes		PER,s completed up to 2022
32.	1400	Nasira Begum M.Sc/M.Ed	Dir Lower	01.06.1984	21.1.2012	Yes		PER,s completed up to 2022
33.	1402	Gul Rukh M.Sc/M.Ed	Peshawar	01.09.1984	31.12.2011	Yes		PER,s completed up to 2022
34.	1415	Saima Ayaz M.Sc/M.Ed	Bannu FR	11.04.1984	20/03/2012	Yes		PER,s completed up to 2022
35.	1456	Shazia Ayub M.Sc/M.Ed	Khyber Agency	05.02.1985	10.01.2012	Yes		Micro Biology PER,s completed up to 2022
36.	1478	Saba Gul M.Sc/M.Ed	Haripur	02.12.1983	11.01.2012	Yes		PER,s completed up to 2022
37.	1484	Nazish Iftikhar M.Sc/M.Ed	Haripur	17.01.1985	25.1.2012	Yes		PER,s completed up to 2022
38.	1485	Sadaf Ambreen M.Sc/B.Ed	D.I.Khan	28.02.1985	2.1.2012	Yes		PER,s completed up to 2022
39.	1541	Gul Andam M.Sc/M.Ed	Chitral	01/01/1985	11/04/2013	Yes		PER,s completed up to 2022
40.	1559	Adeela Hakeem M.Sc/M.Ed	Dir Lower	19.08.1984	31.12.2011	Yes		PER,s not provided
41.	1561	Tahira Jabeen M.Sc/M.Ed	Chitral	15.03.1986	28.12.2011	Yes		PER,s completed up to 2022
42.	1588	Sohaila Rani M.Sc/M.Ed	Chitral	09.04.1983	10.01.2012	Yes		PER,s completed up to 2022
43.	1770	Zeb Faryal Mir M.Sc/M.Ed	Chitral	11.01.1986	28/12/2011	Yes		PER,s completed up to 2022
44.	1799	Shagufta Rehman M.Sc/M.Ed	Bajour Agency	04.02.1985	31.12.2011	Yes		PER,s completed up to 2022
45.	1918	Sanobar Khan M.Sc/M.Ed	Kohat	23/11/1981	01/01/2013	Yes		PER,s not provided
46.	2146	Nazneen Begum M.Sc/M.Ed	Mardan	20/12/1971	28/10/2014	Yes		PER,s not provided

MATHS

S#	SL#	Name and Qualification	Domicile	Date of Birth	D/o of Ist: Appt: as SST	Whether she has completed 05 years experience	Whether Eligible Or Not	Remarks
1.	324	Nasreen Akhtar M.Sc/M.Ed	D.I.Khan	25.02.1966	02.10.2003	Yes		PER,s completed up to 2022
2.	703	Mamoona Nazir M.Phil/M.Ed	Kohat	06/12/1984	01/01/2009	Yes		PER,s completed up to 2022
3.	1045	Naila Hassan MSc/M.Ed	Abbottabad	10/07/1980	01/01/2009	Yes		PER,s completed up to 2022
4.	1151	Saima Abbas M.Sc/M.Ed	Mardan	1.2.1980	30.05.2012	Yes		PER,s completed up to 2022
5.	1159	Mehreen Abbasi M.Sc/B.Ed	Abbottabad	23.12.1984	09/10/2012	Yes		PER,s completed up to 2022

certified that all the officers included in the panel for promotion:-

- (a) Hold the lower posts on regular basis and none of them is holding the post on adhoc / acting charge basis.
- (b) Have the prescribed minimum length of qualifying service as required under the Rules.
- (c) None of them is on deputation to any organization under the Federal/Provincial/autonomous/Semi-autonomous/International organizations etc:
- (d) Neither any disciplinary/departmental proceedings/Anti-corruption/Judicial enquiry is pending against them nor has any penalty been imposed upon any one of them during the last five years.
- (e) No senior officer of their batch has been promoted on acting charge basis.
- (f) The Seniority list of (F) SST B-16 officers is final, undisputed and not subjudice.
- (g) Synopsis of ACRs are enclosed.
- (h) No project employees are reflected in para-4 of the working paper for consideration of SS BS-17. A officers mentioned in para-4 of the working paper are regular civil servants within the meaning of Civil Servant Act, 1973.

The Departmental Promotion committee is requested to determine the suitability of the (female) SST BS 16 from the list at Para-4 above for promotion as SS BPS-17 (Regular) in Elementary & Secondary Education Department.

[Handwritten Signature]

Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.

[Handwritten Signature]
08
23

Deputy Secretary
Govt: of Khyber Pakhtunkhwa
Elementary & Secondary Education
Department

IMMEDIATE

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block- "A" Opposite M PA's Hostel, Civil Secretariat
Peshawar
Phone No. 091-9223587

13

No. SO (P/F) E&SED2-6/Promotion/SST-SS/2023
Dated Peshawar the, 28th September, 2022

To

1. The Secretary to Govt. of Khyber Pakhtunkhwa,
Establishment Department.
2. The Secretary to Govt. of Khyber Pakhtunkhwa,
Finance Department.

Subject: - **WORKING PAPER FOR PROMOTION FROM SST (BS-16)
(FEMALE) TO SS/HM (BS-17) (FEMALE).**

Dear Sir,

I am directed to refer to the subject noted above and to state that a meeting of the Departmental Promotion Committee (DPC) is scheduled to be held on **5th October, 2023 at 11.00 AM** under the Chairmanship of Secretary E&SE Department in his office to discuss the subject matter, (working papers are enclosed).

2. You are, therefore, requested to kindly depute their representatives to attend the said meeting on the date, time and venue as mentioned above, please.

Encl: as above.

Yours Sincerely,

[Signature]
SECTION OFFICER (PRIMARY/F)

SST Promotion
N. M. 3/10/23
D. No. 1044
Date 02-10-23
Khyber Pakhtunkhwa
Elementary & Secondary Education Department

DD-I Copy forwarded to: -

1. PS to Secretary, E&SE Department Khyber Pakhtunkhwa.
2. PA to Additional Secretary (Establishment) E&SE Department.
3. Director E&SE Khyber Pakhtunkhwa with the advice to attend the meeting along with complete record/working paper.

[Signature]
2.10.23

ADDE(F)
[Signature]
3025
2/10/23
SECTION OFFICER (PRIMARY/F)



GOVERNMENT OF KHYBER PAKHTUNKHWA
 ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
 Block- "A" Opposite M PA's Hostel, Civil Secretariat
 Peshawar
 Phone No. 091-9223587

14

No. SO(P/F)E&SED/2-6/DPC/SST to SS/HM/2023
 Dated Peshawar the 18th September, 2023

To

The Director,
 Elementary & Secondary Education,
 Khyber Pakhtunkhwa, Peshawar.

Subject: - WORKING PAPER FOR PROMOTION OF SST (FEMALE) BPS-16 TO SS/HEADMISTRESS BPS-17.

I am directed to refer to this Department letter of even No. dated 14.09.2023 on the subjects noted above and to state that Pre-DPC meeting has been scheduled to be held on 20.09.2023 (Wednesday) at 11:00 AM in the office of Additional Secretary (Establishment), E&SE Department, please.

2. You are, therefore, requested to attend the said meeting on date, time and venue alongwith complete record/working paper, please.

[Handwritten Signature]
 SECTION OFFICER (P/F)

Copy forwarded to:-

1. PS to Secretary, E&SE Department.
2. PA to Additional Secretary (Estab) E&SE Department.

[Handwritten Signature]
 SECTION OFFICER (P/F)

2957
 19/9/23

607
 19-9-23

DDI
 19-9-23

ADDE(P)
[Handwritten Signature]
 19/9
 1651

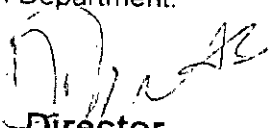
Supd
[Handwritten Signature]
 19/9/23

certified that all the officers included in the panel for promotion:-

18

- (a) Hold the lower posts on regular basis and none of them is holding the post on adhoc / acting charge basis.
- (b) Have the prescribed minimum length of qualifying service as required under the Rules.
- (c) None of them is on deputation to any organization under the Federal/Provincial/autonomous/Semi-autonomous/International organizations etc:
- (d) Neither any disciplinary/departmental proceedings/Anti-corruption/Judicial enquiry is pending against them nor has any penalty been imposed upon any one of them during the last five years.
- (e) No senior officer of their batch has been promoted on acting charge basis.
- (f) The Seniority list of (F) SST B-16 officers is final, undisputed and not subjudice.
- (g) Synopsis of ACRs are enclosed.
- (h) No project employees are reflected in para-4 of the working paper for consideration of SS BS-17. All officers mentioned in para-4 of the working paper are regular civil servants within the meaning of Civil Servant Act, 1973.

3. The Departmental Promotion committee is requested to determine the suitability of the (female) SST BS-16 from the list at Para-4 above for promotion as SS BPS-17 (Regular) in Elementary & Secondary Education Department.



Director

Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.

08
25/9/23

Deputy Secretary

Govt. of Khyber Pakhtunkhwa
Elementary & Secondary Education
Department

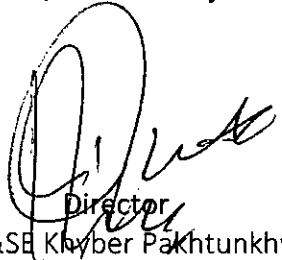


DIRECTORATE ELEMENTARY & SECONDARY EDUCATION
Khyber Pakhtunkhwa, Peshawar.

AUTHORITY LETTER

I, Dr. Iqbal Khan, Director (E&SE) Khyber Pakhtunkhwa Peshawar do hereby authorized Mr. Behramand Khan, Assistant Director Litigation-II of this Directorate for submission of Joint Parawise Comments in **Service Appeal No. 918/2022** case titled **Saima Naz, SST District Abbottabad Vs Government of Khyber Pakhtunkhwa & others** fixed for hearing on 28-11-2023, hence, an authority letter is hereby issued in favor of the above-named officer.

Dated: 27-11-2023


Director
E&SE Khyber Pakhtunkhwa,
Peshawa