BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Amended Service Appeal No. 597/2019	9	
Shamim Ara	Арр	eliant
VERSUS		
Director Education newly emerged Tribal	Districts,	FATA
Secretariat Warsak Poad & others	Pasnan	dante

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Through

Dated 13.03.2019

Akhunzaga Ahmad Sceed

Advocate High Court 15-B, Haroon Mansion, Khyber Bazar, Peshawar Cell No.0333-2902529

Appellant

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Amended Service Appeal No. 597/2019

VERSUS

- Director Education newly emerged Tribal Districts, FATA Secretariat, Warsak Road, Peshawar
- 2. District Education Officer, District Bajour
- 3. Departmental promotion Committee (DPC), through its Convener, Directorate of Education, FATA Secretariat, Warsak Road, PeshawarRespondents

AMENDED SERVICE APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL ACT, 1974, AGAINST THE NON CONSIDERATION OF THE APPELLANT'S CASE FOR THE PROMOTION FROM DM (F) BPS-15 TO Sr.DM (F) BPS-16 IN ITS MEETING HELD ON 10.05.2018 WHEREBY THE NAME OF THE APPELLANT WAS DROPPED TO BE PROMOTED TO Sr. DM (F) BPS-16 AND THE IMPUGNED ORDER OF RESPONDENT NO.1 DATED NIL WHEREBY HE DID

THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN A STIPULATED PERIOD OF NINETY DAYS.

Prayer

By accepting this appeal,

- a) The impugned non-consideration of the appellant case for her promotion from DM (F) BPS-15 to Sr. DM (F) BPS-16 in its meeting held on 10.05.2018 whereby the name of the appellant was dropped for promotion to Sr. DM (F) BPS-16 and
- b) The impugned order of the respondent No.1 dated nil whereby he did not decide the departmental Appeal of the appellant may please be set aside and
- c) Consumently the appellant may be promoted from DM (F) BPS-15 to Sr. DM (F) BPS-16 with all back benefits.

Respectfully Sheweth:

That respondent No.2 advertized various posts including Drawing Master posts and the appellant being eligible applied for the same.

- 2. That after fulfilling all codal formalities the appellant was issued appointment order vide dated 30.08.2003 as untrained teacher because the appellant had passed Metric with Arts subjects. (Copies of Education Testimonials and Appointment Order are attached as "A" & "B").
- 3. That the appellant was medically found fit and as such assumed the charge of her duty on 23.04.2003.
- 4. That the appellant has performed her duty with full commitment, devotion and punctuality at various stations of Bajour Agency.
- 5. That the appellant, despite performing her duty as a teacher kept continue her education privately side by side and acquired diploma of Drawing Master, degree of B.A, certificate of B.Ed and degree of Master in Islamiat. (Copies of Education testimonials are attached as annexure "C").
- 6. That the appellant was entered as trained teacher on 24.07.2009 and on 25.11.2013 she was promoted from BPS-9 to BPS-15. (Copy of the Service Book is attached as annexure "D").

- That in April 2018, according to the direction of 7. Directorate of education of newly emerged Tribal Districts, the seniority list of the Female Drawing Masters (DMs) for promotion was prepared from District Bajour and was sent to Directorate of education of newly emerged Districts. necessary to mention here that three posts of Sr. DM (F) BPS-16 were vacant for promotion, therefore, the appellant alongwith two other being top of the seniority list of female Drawing Master, so, the necessary documents of appellant alongwith two other were asked from the appellant as well as from the concerned school and the same were submitted accordingly. (Copy of the seniority list is attached as annexure "E").
- 8. That the meeting of Departmental promotion Committee (DPC) was held on 10.05.2018 to recommend the appellant alongwith two other for promotion to Sr. DM (F) BPS-16 but unfortunately the appellant was not considered for promotion on the reason that the appellant had obtained diploma in Drawing Master from Skill Development Council.

- 9. That for the redressal of her grievances the appellant submitted appeal/representation on 11.05.2018 but the same has not been decided within a stipulated period of 90 days. (Copy of appeal/presentation is attached as annexure "F").
- 10. That later on, notification regarding promotion of one female Drawing master among them from DM (F) BPS-15 to the post of Sr. DM (F) BPS-16 was issued vide notification dated 29.06.2018. (Copy of the Notification is attached as annexure "G").
- 11. That the appellant filed a service appeal before this Hon'ble Tribunal wherein the appellant was accorded permission during the pendency of appeal to amend the same. (Copy of the order dated 21.02.2019 is attached as annexure "H").
- 12. That the appellant now prefers this amended service appeal for the following amongst other grounds:

GROUNDS:-

A. That non-consideration of the appellant's case for promotion from DM (F) BPS-15 to Sr. DM (F) BPS-16 is prima facie illegal, unlawful and thus ineffective upon the rights of the appellant.

- B. That as per promotion rules, the appellant was eligible to be promoted to Sr. DM (F) BPS-16 but she was deprived from the same with malafide intention to make space for their blue eyed persons. (Copy of the promotion rules is attached as annexure "I").
- C. That others teaching cadres such as AT & TT etc, where who did not possess professional diploma were given the benefit of Master Degree and were promoted on the basis of master degree but the appellant was discriminated as the appellant had also a Master Degree as well. (Copy of the Notification is attached as annexure "J").
- D. That respondent department should have been promoted the appellant from DM (F)/BPS-15 to the post of Sr.DM (F)/BPS-16 because if the appellant possessed professional Diploma from skill Development Council, however, on the other side the appellant also possessed Master Degree but the respondent Department deprived the appellant from this benefits malafidely.
- E. That the appellant was given the benefit of additional subjects at the time of appointment because the appellant had passed metric with additional subjects.

- F. That during the process of promotion the date of birth of the appellant was tempered in the service book with the intention to deprive the appellant from the promotion.
- G. That in view of the above facts and circumstance the appellant was illegally dropped from the recommendation of DPC for promotion and was discriminated as well.
- H. That any other ground not specifically mentioned, may be raised at the time of arguments, with the prior permission of this Hon'ble Tribunal.

It is, therefore most humbly prayed that by accepting this amended appeal,

- a) The impugned non-consideration of the appellant case for her promotion from DM (F) BPS-15 to Sr. DM (F) BPS-16 in its meeting held on 10.05.2018 whereby the name of the appellant was dropped for promotion to Sr. DM (F) BPS-16 and
- No.1 dated nil whereby he did not decide the departmental Appeal of the appellant may please be set aside and

- c) Consumently the appellant may be promoted from DM (F) BPS-15 to Sr. DM (F) BPS-16 with all back benefits.
- d) Any other relief deems fit and appropriate in the circumstances of the instant case may please be passed.

Appellant

Through

Akhunzada Ahmad Saeed

Advocate High Court

Dated 13.03.2019

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Amended Service Appeal No/2019
Shamim AraAppellant
VERSUS
Director Education newly emerged Tribal Districts, FATA Secretariat, Warsak Road & others
AFFIDAVIT
I, Shamim Ara D/o Khaista Rahman, R/o Targhau Painda Khel, Tehsil Barang, District Bajour, do hereby solemnly affirm and declare on oath that the contents of the accompanying Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court. Limit Assault Ass
Akhunzada Ahrrad Saeed Advocate High Court ATTESTES NC: ARY PUBLIC THE COURT TO SEE THE CO

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Amended Service Appeal No/2019	
Shamim Ara	nt
VERSUS Director Education newly emerged Tribal Districts, FAT Secretariat, Warsak Road & others	
ADDRESSES OF PARTIES APPELLANT:	
Shamim Ara D/o Khaista Rahman, R/o Targhau Painda Khel, Tehsil Barang, District Bajour	
RESPONDENTS	
 Director Education newly emerged Tribal District FATA Secretariat, Warsak Road, Peshawar 	ts,
2. District Education Officer, District Bajour	
3. Departmental promotion Committee (DPC), through its Convener, Directorate of Education, FAT Secretariat, Warsak Road, Peshawar	
Appellant Through	
Dated 13.03.2019 Advocate high Court	1

sw No.s(A) 13415

Roll No.

4887

Saidu Sharif Swat N.W.F.P. Pakistan
Secondary School Certificate Examination
SESSION ANNUAL 199
8
SHAMIM ARA

Son/Daughter of	KHAT	29T 2 Part 188 - 31	·-
and a student of		STA RAHMAN	
	MALA	KAND AGENCY.	
has passed the Secondar	y School Certi	ficate Examina	tion
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199 Sas a Regular/Private car	ndidate. He/She obtains	d 453 Marks o	out of 850 and has
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The Candidate passed in the following			
	· · · •	5. MATHS 7.	GEN:SCIENCE
2. Urdu 4. Pak	kistan Studies		
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SAIDU SARIF SWAT

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Secondary School artificate Examination



(GENER/LGROUP)

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Checked by The Checked by

Intermediate & Secondary Education

SAIDU SHARIF SWAT

Abbottabad N.W.F.P. - Pakistan
HIGHER SECONDARY SCHOOL Roll No. 27681

SESSION ANNUAL 2002

Humanities Group

This is to certify that

SHAMIM ARA

Son/Daughter of

KHAISTA RAHMAN

A candidate from ABBOTTABAD DISTRICT

has passed the Higher Secondary School Certificate Examination of the Board of Intermediate and Secondary Education, Abbottabad held in May 2002 as a Regular/Private Candidate. He/She obtained 473 marks out of 1100 and has been placed in Grade D Representing FAIR.

The Examination was taken as a whole/in parts and the candidate passed in the following subjects.

ENGLISH

2. URDU

3.ISL.EDUCATION-PAK STUDIES

.ISLAMIC HISTORY 5.CIVICS

6. ISLAMIC STUDIES



SNo: Z-03763

BOARD OF INTERMEDIATE & SECONDARY EDUCATION ABBOTTABAD

DETAILED MARKS CERTIFICATE Higher Secondary School Certificate Examination

Part-II

Namo : SHAMIM ARA Secolon: 2002 (Annual)
Father's Name : KHAISTA RAHMAN
Group : HUMANITIES Roll No: 27681

			, s.F.,		Ma	arks O	btained	
0.42	Marks	(S Part-I		· . 3 Part-II		Total	Marks In Words	
Subjects		Theory	Pract	Theory	Pract			
English	200	41.	1	39	1.4	80 .	Eighty Only	
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islamic Education & Pak Studi	es 100	-		42		42	Forty-Two	
tslamic History	200	-	-	<i>7</i> .0		70	Seventy Only	
Civics	200	1.4-2.3	:	- 77		77	Seventy-Seven	
Islamic Studies	· 200	177	ere A	\ <u>1</u> 184	7	1.18	One Hundred Eighteen	
, , ,		· Viveria	1 7 20	A 180	\$ 75 "		Four Hundred Seventy-Three Only."	

Total: 🕽 1100

Remarks

73-D. Four Hundred Seventy-Three Only.

Checked By:

Date: 31-August, 2002

Controller of Examinations

Boatti of Intermediate & Secondary Education

Abbottabed

Note: Errors / Omissions excepted

Khakear and BRAINS Software Enterprise (KSSoft)

PAIL DIELS

OFFICE OF THE AGENCY EDUCATION OFFICER BAJAUR AGENCY AT KHAR

APPOINTMERTS/ADJUSTMENTS

Consequent upon the result of Interview held on 23/4/2003 and approved by Political Agent Bajaur Agency, the following DM (Fmale Trained/un trained) candidates of Bajaur Agency are hereby appointed against the vacant/newly created DM posts in the schools noted below in BPS No 9 @ Rs 2410-145-6760 and BPS 14 Rs 3100-240-10300 (for those who are B.A/B.Sc (2nd Division) P.M with usual Allowances as admissible under the rules (ON CONTRACT BASIS) from the date of their taking over charge in the interest of public service.

<u>S.No</u>	Name of Candidate with parentage	Name of School where appointed	Remarks
1	Fozia D/O Amir Muhammad Shah	GGMS Malkana Nawagai	Against Newly Created DM Post (Trained candidate)
2	Farida Bibi D/O . Muhammad Sultan	GGMS Çivil Colony Nawagai	Against Vacant Post (Untrained)
73	Shamim Ara D/O Khaista Rehman	GGMS Ghakhai Mamund	Against Newly Created DM Post (Untrained)

TERMS/CONDITIONS

The period of contract will be One Year

The appointments of the candidates are being made purely on temporary 2 and is liable to termination at any time without assigning any reason. In case they wish to resign from their service they will give one month prior notice OR forfeit one month pay in lieu there of.

Their pay will not be submitted to the Accounts officer concerned before verification of all certificates from the concerned Institution/Domicile

The fresh candidates should produce their health and age certificate from 5 the Agency surgeon concerned.

They should produce their original Certificates before taking over charge.

They should not be handed over charge of the post if they below 18 years OR above 40 years of age.

If they do not take over charge within 15 days their order will be treated as cancelled.

No TA DA is allowed to the candidates.

(Mr RAZI HUSSAIN BANGUISH) Agency Education Officer Bajaur Agency

4222-29 /Transfer/ Dated 30

_ Copy to the:

Director of Education FATA N.W.F.P Peshawar

Political Agent Bajaur Agency

Agency Accounts Officer Bajaur Agency.

AAEO (Female) Concerned

Principal/Head Master Concerned/Official Concerned.

Accountant of the local Office

psy Education Officer Bajaur Agency.

Reg. No: SDCL/AIMMS/MARDAN-33733 / Roll No: 033428 Serial No 005803 Competency Based

(Amended Ordinance National Training Ordinance No. Nebsite: www.pakistan.gov.pk/divisions/law-division/media/II-2002.pdf

(I) Of 2002 THIS IS TO ACKNOWLEDGE THAT SHAMIM ARA D/O KHAISATA RAHMAN has successfully completed the prescribed course of study in DIPLOMA IN DRAWING MASTER (D.M) Passed in Grade 'B' / Percentage: 610/1000 = 61%Conducted at: ABBASEEN INSTITUTE OF MEDICAL & MODERN SCIENCES, MARDAN Duration: One Year (Passed in Two Semesters consisting of Six Months each) Session: 2008 - 2009

ALSO STATES



SKILL **DEVELOPMENT** COUNCIL LAHORE.







(A JOINT PROJECT OF GOVERNMENT OF PAKISTAN, I.L.O. & E.F.P.)

DETAILED MARKS CERTIFICATE DIPLOMA IN DRAWING MASTER (D.M) FINA RESULT

Name

SHAMIM ARA D/O KHAISATA RAHMAN

Roll No.

Reg No

SDCL/AIMMS/MARDAN-33733

Session

2008 - 2009

Conducted at

ABBASEEN INSTITUTE OF MEDICAL & MODERN SCIENCES, MARDAN

SEMESTER-1	C. bi-ata	Marks Obtained
Semester	Subjects	
. 01	Tear & Stick, Mixing colors, Sankes, Paper Flowers, Rainbow colors, Shape Pictures, finger Puppets, Sewing Card, Paper Box, Bits & Pieces, Coin Patterns, Jigsaw, Smudge Picture,	310 / 500
	Plate Mask, Spatter Picture, Eight-Pointed Star, Fruit &	
	Magic Picture, Jumping Frog, Butterfly Mobile, Dot Patterns, Print & Press, shadows, Abstract Art, Eggshell people, Compass patterns, Name plaque, Heart Basket, Glove	
	Puppets, Party Chains, Italic writing, Peppier, Mache Bowl, Elephant Garland, Salt & Pepper, Drawing Instruments, Egg shell flowers, Happy faces, Stencil Patterns, Paper Doilies,	
	Odds & Ends, Plaques, Seed Necklace, Egg shell mosaic, Comb & Brush, Wax Crayons, Woven Hanging, Adding	
	Shadows, Italic Letters	

SEMESIEK-1		Manufac Obtained
Semester	Subjects	Marks Obtained
02	Chalk Drawings, Paper Folding, Stencil Fun, Shadow Portrait, Decorated letters, Cardboard loom, Roly-Poly people, Crayon Windows, Balancing Windows, Cartoon Animals, Seeing double, Woolly chick, Marbling, Peppier Mache Rox, Dancing Bear, Cloth picture, Puppet Theatre, Chalk and Crayon, Night	300 / 500
	lights, stained glass, Near & Far, Water colors, Jalking Words, Vanishing Point, silhouettes, Hands and Feet, drawing an oval, Running Duck, Drawing Sections Wist Outs,	
	Blossom, Calligraphy, Stencil fun, Pircushion, Glove Puppets, 3-D College, Writing Well, Wind Chime Clay Lantern	

61% Percentage Grade B Pass Remarks 50% Passing Marks

July 24, 2009 Date of Issue

Fotal Marks 1000 Marks Obtained 610



SKILL DEVELOPMENT COUNCIL LAHORE.







(A JOINT PROJECT OF THE NATIONAL TRAINING BUREAU GOVERNMENT OF PAKISTAN, WORLD BANK, I.L.O. AND E.F.P.)

No: SDCL-2(54)-2011

11Feb, 2011

SUBJECT: - Verification of Diploma/Certificate

The Certificate /Diploma for Drawing Master (D.M) Course issued to Miss Shamim Ara D/O Khaisata Rahman bearing registration# SDCL-Aimms/Mardan-33733/Roll No:033428 conducted at Abbaseen Institute of Medical & Modern Sciences, Mardan is genuine and hereby verified.

Yours truly,

Najeeb Aslam Arain Manager Student Affairs Manager (Student Affairs) Skill Development Council Punjab 397-A-I, Gulberg-III, Near Ghalib Market Lahore.

Walstell Stills

Schama Agbal Open Aniversity Aslamabad



Serial No 197442

Certified that Ma / Ma SHAMIM ARA

San / Daughter of

KHAISTA RAHMAN

Registration Ha 10ABR00367 Roll Ha

Gemester Spring 2012 having met all the requirements under

the semester system is this day awarded the degree of

Bachelor of Artz Group - General

He / She has secured

and has been placed in

Result declared on:

January 23, 2013

Date of issue:

May 28, 2014

NOTE: THIS DEGREE IS TO BE READ IN CONJUNCTION WITH THE TRANSCRIPT/PROVISIONAL CERTIFICATE ISSUED SEPARATELY

- Roll No.

Registration No. 10ABR00367

Final Semester SPR-2012

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD

Serial No. - 317700

PROVISIONAL RESULT CARD

SHAMIM ARA

Father's Name KHAISTARAHMAN

Address SHERGHAZAN SHOPKEEPER SHANGUS MARKET

KHAR P/O KHAR BARANG

BAJOR AGENCY

District

BAJOR AGENCY

has successfully completed

BACHELOR OF ARTS

GROUP-GENERAL

	The detail of pas		is as under:		1.
	Semester	Course Code	Title of Course	Maximum	Obtained
	AUT- 10	1423	COMPULSORY ENGLISH-I	100	55
	AUT- 10	0417	PAKISTAN STUDIES(C)	100	61 .
l	AUT- 10	0416	ISLAMIAT (C)	100	66
	AUT- 10	0413	SOCIOLOGY-II	100	70
	SPR- 11	0419	EDUCATION	100	60
	SPR- 11	0407	MODERN MUSLIM WORLD	100	68
	AUT- 11	0436	SEERAT-E-TAYYABA	100	67
	AUT- 11	1424	COMPULSORY ENGLISH-II	1.00.	61
	AUT- 11	0487	CHILD DEVELOPMENT	100	59
	SPR- 12	0406	ECONOMICS OF PAKISTAN	100	71
	SPR- 12	0437	ISLAMIC STUDIES(E)	100	55
		•			
		- [
	· ,				-

CREDITS:

Total Marks / Obtained

1100/ 693

Result Declared on

JANUARY 23, 2013

Percentage / Grade

63 B

Date of issue

FEBRUARY 01, 2013

entroller of Examinations

Disclaimer:

This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.

Alamalah Islamaka



Serial No. _233098

Certified that Mr. / Ms. SHAMIM ARA

Son / Daughter of KHAISTA RAHMAN

Registration No: 10ABR00367 Roll No: AU671640

having successfully completed the prescribed requirements

in semester SPRING 2014

is awarded the degree of

Bachelor of Education (B.Ed)

He/She has secured 68

% marks and has been placed in B grade.

VICE-CHANCELLOR

Result declared on: January 16, 2015

Date of Issue: January 06, 2016

NOTE: THIS DEGREE IS TO BE READ IN CONJUNCTION WITH THE TRANSCRIPT/PROVISIONAL CERTIFICATE ISSUED SEPARATELY

Roll No.

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD

Serial No. 626159

PROVISIONAL RESULT CARD



AU671640

Name

District

SHAMIM ARA

KHAISTARAHMAN

Father's Name Address SHERSHAZAN SHOPKEEPER SHANGUS MARKET

Registration No. 10ABR00357 Final Semester SPR-2014

HAR FIU KHAR BARANG

KHAR

BAJOR ADENCY :

has successfully completed

BACHELOR OF EDUCATION(B. ED)

The detail of passed courses is

Semester	Course		T M:	ırks
	Code	Title of Course	Maximum	Obtained
AUT- 13	GEAG	SCHOOL ORGANIZATION	100	. 54
5UT 13	1800	ENGLISH (COMPULSORY)	100	71
ALTT- 13	osia	EDUCATIONAL PSYCHOLOGY & GURRICULUM	100	_67
MUT- 13	05.12	PERSPECTIVES OF EDUCATION	100	áé
*U1- 113	0652	ISLAM, PAKISTAN AND MODERN WORLD	100	44.
WT- 13	25:4	EVALUATION, GUIDANCE & RESEARCH	100	70
FR- 14	9655	WORKSHOP & TRACHING PRACTICE	100	- 64
FR- 14	06:34	TEACHING OF ISLANDAT	100	56
	0527	TEACHING F PARTY STUDIES	100	6 <u>5</u>
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CREDITS:

Total Marks / Obtained

412

Result Declared on

JANUARY 16:2015

Percentage / Grade

Date of issue

JANUARY 20, 2015

Controller of Examinations

Disclaimer:

This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued originaf tecord of the university student. under the rules/regulations on the basis of the

PAKISTAN





Session 2013-2015

SHAMIM ARA Baughter of KHAISTA RAHMAN Registration No. 2002760187 Private Candidate of Bajaur Agency having passed the prescribed examination held in Aug, 2016 under Roll No. 2067 is admitted by the University of Malakand to the degree of

Master of Arts

in Islamiyat in Second Division

The examination was taken in parts.

Controller of Examinations

Result Beclared on

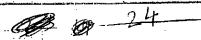
04-Jan-2017

Issuance Bate

13-Mar-2018

Countersianed

Dice Chancellor





University of Malakand Pakistan

DETAILED MARKS CERTIFICATE Serial No. 054921

Duplicate

Name:

SHAMIM ARA

Father's Name:

KHAISTA RAHMAN

Registration No.

2002760187

College/District:

Private Candidate Malakand Agency

Address:

Vill: & P/O Hisar Baba Totakan Teh: Batkhela Mkd Agency

Master of Arts in Islamiyat

Roll Num	iber: 10290	Annual Examination 2		Maximum Marks	Obtained Marks	Remarks
	Subject Name	·	Previous Containing OF TARSEER	100	48	PASSED
Paper-I	AL-OURAN TRAN	ISLATION 1st HALF & COM	MMENTARY & PRINCIPLES OF TAFSEER	100	44	PASSED
aper-II	HADITH & PRINC	TPLES OF HADITH	٠,	100	71	PASSED
		RUDENCE "TEXT"		100	63 ·	PASSED
aper-IV	SEERAT UN NAB	& HISTORY OF ISLAM		100	. 77	PASSED
Paper- V	ARABIC GRAMM	AR & LITERATURE	22.11 2014	500	303	
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Roll Num	iber: 2067	Annual Examination 2	_	Maximum Marks	Obtained Marks	Remarks
	Subject Name		Final CRAMMAR	100	50	PASSED
Paper-VI		NOT ATTOM 2nd HALF AND	COMMENTARY ALONG WITH GRAMMAR	100	45	PASSED
Paper-X	ISLAM & MODE	KN ECONOMICS THOUGH	T & ISLAMIC LAW OF THE LAW	100	40	PASSED
aper-VII	PRINCIPLES OF	ISLAMIC JURISPRUDENCE	1 N C 1	100	49	PASSED
Paper-VIII	ISLAM AND OTH	ER WORLD RELIGIONS	Asto h	100	43	PASSED
aper-IX	KALAM AND PH	IILOSOPHY OF ISLAM	My V2	100	40	PASSED
	VIVA VOCE	7016	Research Jan-2017	600	267	
Examina	ation held from A	ug 02 To Aug 31, 2016	Recuit of table Passed	1100	570	2nd Division

The examination was taken in Parts

Errors and Ommissions are subject to subsequent rectification.

Issuance Date: 17-Jan-2018

Prepared by:

Amjad Shahzad

Checked by:

Controller of Examinations University of Malakand

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MIESTED

General Seniority List of Fe-male Drawing Masters (DMs) of Bajaur Agency for Promotion

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	S.No	Seniority A	Name of Teacher	Acadmic	Professional	Date of declaration of prof: Qualification	Father Name	Designation	BPS	Date of Birth	Domicile	Date 1st Entry into Govt; Service	Date of Appointment on the present	Place of posting	Remarks
}	1		Zareen Taia	ВА	DM		Habib Rasool	SDM	16	01 lp= 36	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \		post		<u> </u>
1	2	_ 2	Fouzia	ВА	рм			-	10	01-Jan-76	wardan	23-Nov-00	23-Nov-00	GGMS Pashat	Promoted to SST
	3	3	Samina Bibi	<u> </u>	DM		Taj Muhammad	SDM	16	01-Jan-80	Malakand	26-Sep-02	26-5ep-02	GGRS Khar	Promoted to SST
	4	4	Samia Syed		 		Taj Muhammad	SDM	16	15-Mar-78	Malakand	24-Dec-99	05-May-03	GG:MS Civil Colony Khar	
	5	5	Nigahat sima	 	DM	05-May-03	Lal Said	SDM	16	02-May-79	Bajaur	22-Mar-00		GG MS Bandagai	
	6		Zainab Begum	<u> </u>	DM+ B.Ed	20-Jun-05	Shah Jehan Badshah	SDM	16			25-Nov-04			
Ì	-	<u>`</u>		8A	DM+B.Ed	31-Mar-01	Shad Muhammad	SDM	16		T	25-Nov-04		GGMS Sadiq Abad	
}			Asia	BA	OM+B.Ed+M.Ed	22-jun-05	Janat Gul	COL		-			25-Nov-04	GGMS Bar Khalozo	
ŀ	8	8	Rukhsana	BA	DM		Noorul Haq	SDM	<u> </u>		Malakamd	25-Nov-04	25-Nov-04	GG:MS Khona	
	9	9	Neelam Umar	МА	DM+M.Ed			SDM	16	14-Mar-79	Malakand	12-Apr-07	12-Apr-07	GG:AS Nari Tangi	
L	(10)	10 .	Shamim Ara	· ·	DM		Muhammad Umar	DM	15	07-Apr-85	Malakand	12-Apr-07	13-Apr-07	GGMS Inayat Killi	Died .
1	11	11	Kalsoom Begum				Khaista Rahman	DM	1,5	03-May-82	Bajaur	01-Sep-03		GGIAS Raghgan	I
ļ	2		Faiza Gul		DM	31-Dec-09	Muhib Ullah	DM	15	07-Mar-81	Bajaur	01-Sep-03		1	<u></u>
1	12)	13		ВА	DM	09-Aug-10	Zarmola	DM	15		Bajaur			GGMS Shah Nari	<u> </u>
+	13		Fazilat Bihi		DM	10-Oct-16	Rahman Ghani	DM	15			05-Jun-09		GG:AS Ghazi Baba	
L		14	Farzana Habib	MA	DM		Habibur Rahman	DM		06-Sep-85		02-Mar-06	13-Apr-16	GEMS Zarif Abad Gardai	
								DIM	15	03-01-89	Bajaur	27/1/2014	27/1/2015	GGMS CC Khar	



E

بخدمت جناب دائر يكشرصاحب ايجيشن فا ٹاسكرٹريٹ _ پيثاور _ بواسطت ايجنسي ايجويشن آفيسرصاحب باجوڑ ايجنبي -

درخواست برائے اپیل۔

عنوان-

جناب عالى!

مودباندگزارش ہے۔ کہ ماکلہ بحثیت D.M پوسٹ پر بمورخہ 01/09/2003 ہے۔ اس کا کہ کے اس کا کہ کہ کہ اسکالہ کو میں کیا ہے۔

اس کا کہ نے D.M ڈیلومہ سکیل ڈویلپ منٹ کونسل لا ہور سے بمورخہ 24/07/2009 میں کیا ہے۔

آپ حا حبان نے اس ڈیلومہ پر ساکلہ کو ساکتہ کو سے مارکیا۔ چونکہ اب سائل کی BPS-16 کو پروموثن ہے مگر جناب

ڈائز کیٹر صاحب آفس سے ساکلہ کو پروموثن لیسٹ سے خارج کیا گیا ہے۔

لہذا آپ صاحبان کے حضور میں ہدر دانہ عرض کی جاتی ہے۔ کہ آپ صاحبان مہربانی کر کے سائلہ کومیرٹ لیسٹ میں دوبارہ شامل کرکے سائلہ کو BPS-16 میں ترقی دینے کے احکامات صادر فرمائے۔تاحیات دعا گورمیگی۔

العارض_ مساة شيم آرآ D.M گورنمنٹ گراز بائی سکول خار با جوڑ ایجنسی-

. Than tois well

C/Member

DD CS Cupdil Ord

Provide Constant of the Constant o



Agency Education Officer Bajaur at Khar



No	Dated	//2018
Email <u>acchajaur@gamil.com</u>	Voice & Fax +	92942220395

NOTIFICATION:

Consequent upon Notification issued by the Director Education FATA Peshawar vide No. 2161-90/File No. 1/Promotion Senior dated 31/35/2018, the recommendation of Departmental Promotion Committee and in pursuance of the government of Pakistan Finance Division (Regularization Wing) Notification No.1(32) R-1/2015 -582-2016 dated 25/07/2016 Islamabad, So (Edu) Notification No. FS/SO/(Edu) SSD/Up gradation /2882-94 dated 22/06/2016 and duly endorsed by Director Education FATA No. 8121-30 dated 08/08/2016. The following DM (F) BPS-15 are hereby promoted to the post of Sr.DM (F) BPS-16 (Rs.18910-1520-64510) plus usual allowance under regular basis on terms & condition given below with effect from 31/05/2018 and the recommendation of Placement Committee, they are here by posted against newly upgraded Sr.DM BPS-16 posts in the Govt: High Schools in the interest of public service.

	S.No	Name of Teacher	Name of School / Place	Posted / Adjusted	Remarks
L	<u> </u>	Kalsoom Begum	GGMS Chinagai	GGHS Pahsat	AVP

Terms & Condition.

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

(Amrullah Wazir) Agency Education Officer Bajaur

Endst No: <u>9973-77</u> Dated Copy of the above is forwarded to the:

- 1: Director of Education FATA w/reference of his notification as quoted above.
- 2. Principal / Headmistress concerned.
- 3. Agency Accounts Officer Bajaur.
 - 4. AAEOs Concerned.
- 5. Teacher Concerned.

Agency Education Officer Balaur

Ames L

Lys

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No._____/2018

Khyber Pakhtikhwi Service Tribunal

Shamim Ara D/o Khaista Rahman R/o Targhau Painda Khel, Tehsil Barang, District Bajour..... 08/9/2018

Appellant

VERSUS

- Director Education newly emerged Tribal Districts, FATA Secretariat, Warsak Road, Peshawar
- 2. District Education Officer, District Bajour
- 3., Kalsoom Begum D/o Muhib Ullah......Respondents R/O, Tehsil Salaszai, District Bajour. SERVICE APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL ACT, 1974, AGAINST THE IMPUGNED ORDER OF RESPONDENT NO.2 **DATED** 29.06.2018 WHEREBY RESPONDENT NO.3 WHO WAS JUNIOR FROM THE APPELLANT IN SENIORITY LIST WAS PROMOTED BUT THE APPELLANT WAS **DEPRIVED** FROM SAME AND THE IMPUGNED ORDER OF RESPONDENT NO.1 DATED NIL WHEREBY HE DID NOT DECIDE THE SERVICE APPEAL OF THE APPELLANT WITHIN A STIPULATED PERIOD OF NINETY DAYS.

Certification in the copy

k Cathana

10.1.2019

Learned counsel for the appellant requests for further time to prepare the brief.

Adjourned to 21.02.2019 for preliminary hearing before

S.B.



21.02.2019

Counsel for the appellant requests for permission to submit an amended appeal wherein the recommendations of DPC would be challenged and the private respondents will also be added.

The appellant may submit an amended appeal within a fortnight subject to all just and legal exceptions. Adjourned to 07.03.2019 for the needful.

SD Chairman

Directorate of Elementary Education Khyber Pakhtunkhwa, Peshawar No. 3021/F.No.2/SST(M)Appeals/Deptt: Pron Dated Peshawar the

То

The Director of Education (FATA) FATA Secretariat, Warsak Road, Peshawar.

Subject: - DEPARTMENTAL PROMOTION FROM SCT/CT/SDM/DM/SAT/AT/ STT/TT/S.QARIES/QARIES/SPST/PSHT TO THE POST OF SSTS (BS-16) REGULAR.

Memo:

Lam directed to refer to your letter No. 5517 dated 07-05-2015 on the subject cited above and to submit here with the parawise reply as noted

- The Seniority of a teacher will be considered in respective cadre from the date of his regular appointment, not from the date of declaration of B.Ed result.
- This office made the promotion of in service teachers to the post of SST on the basis of District Seniority (District level).
- The rules are already available in your office. However a copy of the Rules is enclosed for your perusal. iv.
- The Departmental Promotion Committee (DPC) is the competent forum for the subject promotion.
- The Rules are quite clear, hence follow the rules. The share of initial recruitment/Departmental promotion category of in-service teachers as given below: of various

I, 25 % by initial recruitment & 75% by Promotion amongst the. in-service teachers' i.e. from CT, 40%, DM, 4%, AT,4%, TT, 4%, Qaries, 3% & PST, 20%

No, it's a continous process.

Elementary & Secondary Education Khyber Pakhtunkhwa

Endst: No.

Copy of the above is forwarded to the:-

1. PA to birector L/Directorate.

Deputy Director (Estab)

Elementary & Secondary Education Khyber Pakhtunkhwa

Addl 2 E



COVERNMENT OF KHYBER PAKITIDNKHWA ELEMENTARY & SECONDARY FOUCATION DEPARTMENT

• Peshaivar, dated the 24th July, 2014.

NOTIFICATION

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

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:

AMENDMENTS

·	uisertea in respec	ctive columns, namely:	•	
1	2	3	. 1	
:1.	Subject Specialist (BPS-17)	i. At least second class Master's Degree four years BS Degree in the relesubject; and. ii. Bachelor of Education or Master Education (Industrial Art or Busin Education) or MA. Education equivalent qualification from recognized University.	vant years r.of ness or a	(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 Teast five years service as such and having qualification mentioned in column No. 3: Note: If no suitable candidate is available in the relevant subject the post falling in their promotion quota shall be filled by initial

A BESTED

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

ATTESTED

. (2) (ii) against Serial No. 1B, as so renumbered, for the existing outries, the following Small he substituted, in respective columns, namely:

· .			· · · · · · · · · · · · · · · · · · ·	
7	2	3	14	್ಕೆ ನೈ
"IB.	Secondary School	I At least second class Bachelor	21 (0.35	1. Seventy Five per cent by promotion, on the
	Teacher (BPS-16)	Degree's from a recognized	years.	basis of seniority-cum-fitness, from the
		University on need basis from the		district concerned in the following manner:
		following groups with two subject		
		(s) (Chemistry, Botany or Zoology),		(a) forty per cent from amongst the Senior
		Or	, .	Certified Teachers (BPS-16), with at least
		(b) (Physics, Maths "A" or "B" or Statistics)	•	five years service as Senior Certified
1.	"	Or		Teacher and Certified Teacher and
			:	
j		(c) (Humanities and other equivalent		having qualification mentioned in
		groups at degree level with English		column No.3:
		as compulsory subject;		Provided that if no suitable
* .		as compulsory subject,		candidate is available from amongst
				Senior Certified Teachers for promotion
		and II. Bachelor of Education or Master of		then the post shall be filled by promotion,
		Education (Industrial Art or		on the basis of seniority-cum-fitness,
		Business Education) or M.A		from amongst Certified Teachers, with
		Education or equivalent		
		qualifications from a recognized		at least five years service as such and
		University.	ĺ	having qualification mentioned in
.]			· }	column No. 3;
				(b) four per cent from amongst the Senior
				Drawing Masters (BPS-16), with at least
			·	five years service as Senior Drawing
			1.00	Masters and Drawing Masters and
			-	
				having qualification mentioned in column No.3:
				Column 180.3:
	<u> </u>			

40% CT

04% DM

Mh (3)
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Provided that the satisfie candidate is available from amongst Senior Drowing 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;

(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:

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;

(d) four per cent from amongst the Senior Theology Teachers (BPS-16), with at least five years service as Senior Theology Teachers and having qualification mentioned in column No.3:

04 1.AT

04.1.71

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perioded that if no second cancilate is available from amongs: Senior Theology Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Theology Teachers with at least five years service as such and having qualification mentioned in column No. 3;

(e) three per cent from amongst the Senior Qaris (BPS-16), with at least five years service as Senior Qari and Qari and having qualification mentioned in column No.3:

Provided that if no suitable candidate is available from amongst the Senior Qaris then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from Qaris with at least five years service as such and having qualification mentioned in column No. 3;

(f) twenty per cent from amongst the Primary School Head Teachers (BPS-16); with at least seven years service as Primary School Head Teachers and Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No. 3:

Provided that if no suitable candidate is available from amongst

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TESTED (5)

promotion then the post shall be filled by promotion, on the basis of seniority-cumfiness, from amongs: 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:

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

(ii) twenty Five percent by initial recruitment.

Note:

- 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.
- T. 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.".

MESTED

SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA ELEMENTARY & SECONDARY FUUCATION 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)



OFFFICE OF THE AGENCY EDUCATION OFFICER Bajaur agency at Khar

NOTIFICATION:

Consequent upon Notification issued by the Director Education FATA Peshawar vide No.2291-2330/ File No.1/Promotion dated 10/02/2017, the recommendation of Departmental Promotion Committee and in pursuance of the Government of Pakistan Linance Division (Regularization Wing) Notification No.1(32) R-1/2015 -582-2016 dated 25/07/2016 IslamAbad ,SO (Edu) Notification No. FS/SO/ (Edu) SSD/Up gradation /2882-94 dated 22/06 /2016 and duly endorsed by Directorate Education FATA No.8235-60 dated 08/08/2016. The following TT (F) BPS-15 are here by promoted to the Post of Sr. /TT (F) BPS-16 (Rs.15880-1280-54280) Plus usual Allowance under the rules on regular basis on terms & condition given below with effect from 20/02/2013 and the recommendation of Placement Committee, they are here by posted against newly upgraded Sr.TT-BPS -16 Posts in the Govt High Schools in the interest of public service.

S.No	Name of Teacher	Name of School/place	Adjustment /placement	Remarks.
1	Noorul Huda	GGPS Dag Qilla	GGHS Khar GGHS Inayat Killi	Against newly created Post Against newly created Post
2	Bibi Zainab	GGPS Agra		Against newly created Post
3	Fatima Bibi	GGPS Sadiq Abad	GGHS Raghagan	The state of the s
4	Jamila Bibi .	GGPS Sadiq Atoda GGPS Takht GGPS Loi Baba	GGHS Sharbatai	Against newly created Pos
5	Fatima Bibi	GOFS LOT Data	<u> </u>	

Terms & Condition.

1. They would be on probation for a period of one year, extendible for another one year.

2. The will be governed by such rules and regulations as may be issued from time to time by

3. Their service can be terminated at any time in case their performance is found unsatisfactory during probationary period. In case of misconduct, he shall be proceeded under the rules framed from time to time.

4. Charge report should be submitted to all concerned.

5. Their inter -Se-Seniority on lower post will remain intact.

6. No T.A /DA is allowed for joining him/her duty.

7. They will give an undertaking to be recorded in their Service Book to the effect that any overpayment is made to him in the light of this order will be recovered and if she is wrongly promoted, she will be reversed.

(Fazat Muhammad) The representation of the Bajaur Agency.

Endst: No: 8074-83/Promotion (Female/TT Copy of the above is forwarded to the:

1- Director of Education FATA wheference to his Notification as quoted above.

fated 2/2

 $\sqrt{2017}$.

2. Principals/ Head Masters Concerned

3- Agency Accounts Officer Bajau

4- AAEOs concerned.

Teacher concerned.

Education Officer

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No	/2018	·
Shamim Ara		Appellant
V	ERSUS	
Director Education newly Secretariat, Warsak Road	ū	

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6.	Copy of the Service Book	. D	24-35
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Through

Dated 07.09.2018

Appellant

Akhunzada Shmad Saeed

Advocate High Court 15-B, Haroon Mansion, Khyber Bazar, Peshawar Cell No.0333-2902529

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

Service Appeal No/201	8 Khyber Pakhtukhwa Service Tribunal
	Diary No. 1413
Shamim Ara D/o Khaista Rahmai	n, Dared 08/9/2018
R/o Targhau Painda Khel,	f V
Tabeil Barana District Bajour	Annollant

VERSUS

- 1. Director Education newly emerged Tribal Districts, FATA Secretariat, Warsak Road, Peshawar
- 2. District Education Officer, District Bajour
- 'З. Kalsoom Begum D/o Muhib Ullah......Respondents R/O, Tehsil Salaszai, District Bajour. SERVICE APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL ACT. 1974, AGAINST THE IMPUGNED ORDER OF iledto-day RESPONDENT NO.2 DATED **29.06.2018** WHEREBY RESPONDENT NO.3 WHO WAS JUNIOR FROM THE APPELLANT IN THE SENIORITY LIST WAS PROMOTED BUT THE APPELLANT WAS DEPRIVED FROM SAME AND THE IMPUGNED ORDER OF **RESPONDENT NO.1 DATED NIL WHEREBY HE** DID NOT DECIDE THE SERVICE APPEAL OF THE APPELLANT WITHIN A

PERIOD OF NINETY DAYS.

STIPULATED

Prayer

By accepting this appeal,

- a) The impugned order of respondent No.2 dated 29.06.2018 whereby respondent No.3 candidate who was junior to the appellant in the seniority list was promoted but the appellant was deprived from the same and
- b) The impugned order of respondent No.1 dated nil whereby he did not decide the Service Appeal of the appellant may please be set aside.
- c) And consequently the appellant may be promoted from DM(F) BPS-15 to the post of Sr. DM(F) BPS-16 with all back benefits.

Respectfully Sheweth:

- 1. That respondent No.2 advertized various posts including Drawing Master posts and the appellant being eligible applied for the same.
- 2. That after adopting all codal formalities the appellant was issued appointment order vide dated 30.08.2003 as untrained teacher because the appellant had passed Metric with Arts

- subjects. (Copies of Education Testimonials and Appointment Order are attached as "A" & "B").
- 3. That the appellant was medically found fit and as such assumed the charge of her duty on 23.04.2003.
- 4. That the appellant has performed her duty with full commitment, devotion and punctuality at various stations of Bajour Agency.
- 5. That the appellant, despite performing her duty as a teacher kept continue her education privately side by side and acquired diploma of Drawing Master, degree of B.A, certificate of B.Ed and degree of Master in Islamiat. (Copies of Education testimonials are attached as annexure "C").
- 6. That the appellant was entered as trained teacher on 24.07.2009 and on 25.11.2013 she was promoted from BPS-9 to BPS-15. (Copy of the Service Book is attached as annexure "D").
- 7. That in April 2018, according to the direction of Directorate of education of newly emerged Tribal Districts, the seniority list of the Female Drawing Masters (DMs) for promotion was prepared from

District Bajour and was sent to Directorate of education of newly emerged Districts. It is necessary to mention have that the appellant was on the top of the seniority list of female Drawing Master for promotion, therefore, the necessary documents of appellant were asked from the appellant and from the concerned school and the same were submitted accordingly. (Copy of the seniority list is attached as annexure "E").

- 8. That on 28.04.2018, the appellant got information from Directorate of Education of newly emerged Tribal Districts, and the clerk of respondent No.2/EDO also orally informed the appellant that the appellant could not be promoted from DM (F) BPS-15 to Sr. D.M (F) BPS-16 because the appellant has obtained diploma in Drawing Master from skill Development Council. It is pertinent to mention here that the appellant was not issued any thing in writing that she was refused to be promoted from DM (F) BPS-15 to Sr. DM (F) BPS-16.
- 9. That for the redressal of her grievances the appellant submitted appeal/representation on 11.05.2018 but the same has not been decided within a stipulated period of 90 days. (Copy of appeal/presentation is attached as annexure "F").

- 10. That the notification regarding promotion from DM (F)BPS-15 to the post of Sr. DM (F) BPS-16 was issued vide notification dated 29.06.2018 wherein the appellants name was not mentioned and respondent No.3, who was junior to the appellant was promoted to Sr. DM (F) BPS-16. (Copy of the notification is attached as annexure "G").
- 11. That the appellant now prefers this service appeal for the following amongst other grounds:

GROUNDS:-

- A. That the refusal/denial of respondent No.2 to promote the appellant from DM(F) BPS-15 to the post of Sr. DM (F) BPS-16 is prima facie illegal, unlawful and against the seniority list as respondent No.3 who was junior to the appellant was promoted and the appellant was ignored.
- B. That other teaching cadres such as AT & TT etc, where who did not possess professional diploma were given the benefit of Master Degree and were promoted on the basis of master degree but the appellant was discriminated as the appellant was also possess the Master Degree.

- C. That respondent department should have been promoted the appellant from DM(F)/BPS-15 to the post of Sr.DM (F)/BPS-16 because if the appellant possessed professional Diploma from skill Development Council, however, on the other side the appellant also possessed Master Degree but the respondent Department deprived the appellant from this benefits malafidely.
- D. That the appellant was given the benefit of additional subjects at the time of appointment because the appellant had passed metric with additional subjects.
- E. That during the process of promotion the date of birth of the appellant was tempered in the service book with the intention to deprive the appellant from the promotion.
- F. That in view of the above facts and circumstance the appellant was illegally deprived from the promotion and was discriminated as well.
- G. That any other ground not specifically mentioned, may be raised at the time of arguments, with the prior permission of this Hon'ble Tribunal.

It is, therefore most humbly prayed that by accepting this appeal,

- a) The impugned order of respondent No.2 dated 29.06.2018 whereby the respondent no.3 who was junior to the appellant in the seniority list was promoted but the appellant was deprived from the same and
- b) the impugned order of respondent No.1 dated nil whereby he did not decide the Service Appeal of the appellant may please be set aside.
- c) And consequently the appellant may please be promoted from DM/F/ BPS-15 to the post of Sr. DM/F/ BPS-16 with all back benefits.
- d) Any other relief deems fit and appropriate in the circumstances of the instant case may please be passed.

Appellant

Through

Akhunzada Ahmad Saeed

Advocate High Court

Dated 07.09.2018

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No)/2018	
Shamim Ara		Appellant
	VERSUS	
	,	Tribal Districts, FATARespondents

AFFIDAVIT

I, Shamim Ara D/o Khaista Rahman, R/o Targhau Painda Khel, Tehsil Barang, District Bajour, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

Identified by

Akhunzada Ahmad Saeed Advocate High Court Shain Ara

DEPONENT

CNIC#: 15402-3887717-2

MC FART PUBLIC

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Serv	rice Appeal No/2018
Sha	mim Ara
٠	VERSUS
	ctor Education newly emerged Tribal Districts, FATA retariat, Warsak Road & others
	ADDRESSES OF PARTIES
<u>A P</u>	PELLANT:
Tehs	Targhau Painda Khel, sil Barang, District Bajour S P O N D E N T S
1.	Director Education newly emerged Tribal Districts FATA Secretariat, Warsak Road, Peshawar
2.	District Education Officer, District Bajour
3.	Kalsoom Begum D/o Muhib Ullah
	Appellant Through
	Akhunzada Ahmad Saood

Dated 07.09.2018

Akhunzada Ahmad Saeed
Advocate High Court

Board of Intermediat& Secondary Education

SAIDU SKIRF SWAT

DETAILED MAKS CERTIFICATE

Secondary School ertificate Examination



(GENERAL GROUP)

Session 1998

(Annual/Supplementary)

1NO: 49673	4.	,,	
Name Shamin Arm			
Father's Name Khaista Raman Roll I	No.	4887	

SUBJECTS	Total M	IARKS OBTAINED
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Note: Errors/omissions/excepted.

Prepared by

Checked by_____

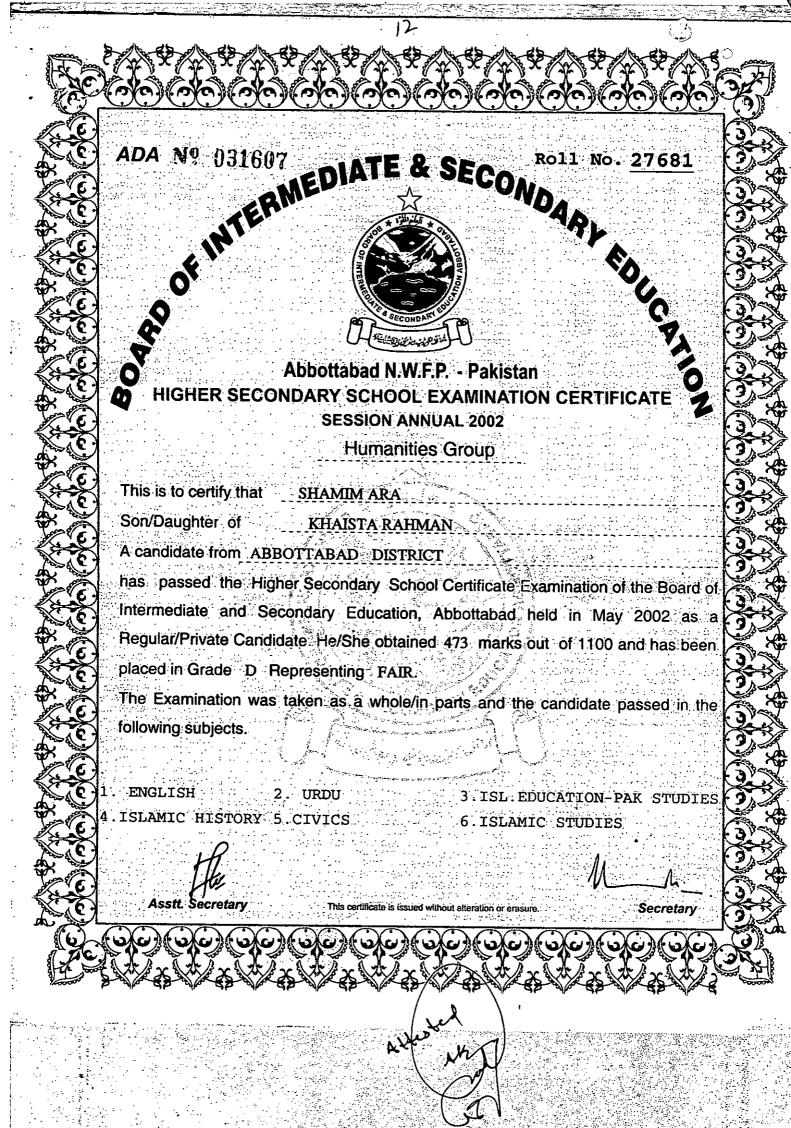
Date______19

Controller of Examinations

Board of Intermediate & Secondary Education

SAIDU SHARIF SWAT

Allesta



SN4: Z-03763

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BOARD OF INTERMEDIATE & SECONDARY

DETAILED MARKS CERTIFICATE

Higher Secondary School Certificate Examination 1985

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Name: SHAMIM ARA BUCAT DUABBOTTOBAD BOARD OF INTERMERCENT

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Father's Name KHAISTA RAHMAN

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OFFICE OF THE AGENCY EDUCATION OFFICER BAJAUR AGENCY AT KHAR

APPOINTMENTS/ADJUSTMENTS

Consequent upon the result of Interview held on 23/4/2003 and approved by Political Agent Bajaur Agency, the following DM (Fmale Trained/untrained) candidates of Bajaur Agency are hereby appointed against the vacant/newly created DM posts in the schools noted below in BPS No 9 @ Rs 2410-145-6760 and BPS 14 Rs 3100-240-10300 (for those who are B.A/B.Sc (2nd Division) P.M with usual Allowances as admissible under the rules (ON CONTRACT BASIS) from the date of their taking over charge in the interest of public service.

Name of Candidat	e with Name of School where	Remarks
S.No parentage	<u>appointed</u>	
I Fozia D/O Amir Muhammad Shah	GGMS Malkana Nawagai	Against Newly Created DM Post (Trained candidate)
2 Farida Bibi D/O Muhammad Sultan	GGMS Civil Coluny Nawagai	Against Vacant Post (Untrained)
3 Shamim Ara D/O Khaista Rehman	GGMS Ghakhai Mamund	Against Newly Created DM Post (Untrained)

TERMS/CONDITIONS

The period of contract will be One Year

The appointments of the candidates are being made purely on temporary and is liable to termination at any time without assigning any reason. In case they wish to resign from their service they will give one month prior notice OR forfeit one month pay in lieu there of.

Their pay will not be submitted to the Accounts officer concerned before verification of all certificates from the concerned Institution/Domicile

Charge report should be submitted in duplicate to this office.

The fresh candidates should produce their health and age certificate from the Agency surgeon concerned.

6. They should produce their original Certificates before taking over charge.

7 They should not be handed over charge of the post if they below 18 years
OR above 40 years of age.

8 If they do not take over charge within 15 days their order will be treated as

9 No TA DA is allowed to the candidates.

(Mr RAZI HUSSAIN BANGUISH)

Agency Education Officer
Bajaur Agency

Endst: No 4222-27 /Transfer/ Dated 30 /8/2003

Copy to the:

Director of Education FATA N.W.F.P. Peshawar

2 Political Agent Bajaur Agency

Agency Accounts Officer Bajaur Agency.

AAEO (Female) Concerned

5 Principal/Head Master Concerned/Official Concerned

6 Accountant of the local Office

Agency Education Officer
Bajaur Agency

Inamul Haq

PRUPLIPITE (Amended Ordinance Aut 1980 (Amended Ordinance Aut 1980) (Amend 005803 Established under National Training Ordinance/Act 1980 (Amended Ordinance No. Website: www.pakistan.gov.pk/divisions/law-division/media/II-2002. THIS IS TO ACKNOWLEDGE THAT SKILL DEVELOPMENT COUNCIL LAHOR SHAMIM ARA D/O KHAISATA RAHMAN has successfully completed the prescribed course of study in LOMA IN DRAWING MASTER (D.M) Passed in Grade 'B' / Percentage: 610/1000 = 61% Conducted at: ABBASEEN INSTITUTE OF MEDICAL & MODERN SCIENCES, MARDAN Duration: One Year (Passed in Two Semesters consisting of Six Months each) Session: 2008 - 2009



SKILL **DEVELOPMENT** COUNCIL LAHORE.







(A JOINT PROJECT OF GOVERNMENT OF PAKISTAN, I.L.O. & E.F.P.)

DETAILED MARKS CERTIFICATE DIPLOMA IN DRAWING MASTER (D.M) FINA RESULT

Name

SHAMIM ARA D/O KHAISATA RAHMAN

Roll No.

033428

Reg No

SDCL/AIMMS/MARDAN-33733

Session

2008 - 2009

Conducted at

ABBASEEN INSTITUTE OF MEDICAL & MODERN SCIENCES, MARDAN

SEMESTER-I	Cubicato	Marks Obtained
Semester	Subjects Painbow	
01	Tear & Stick, Mixing colors, Sankes, Paper Flowers, Rainbow colors, Shape Pictures, finger Puppets, Sewing Card, Paper Box, Bits & Pieces, Coin Patterns, Jigsaw, Smudge Picture, Plate Mask, Spatter Picture, Eight-Pointed Star, Fruit & vegetables, Splatter Painting, Shape Mobiles, Capital Letters, Magic Picture, Jumping Frog, Butterfly Mobile, Dot Patterns, Print & Press, shadows, Abstract Art, Eggshell people, Compass patterns, Name plaque, Heart Basket, Glove Puppets, Party Chains, Italic writing, Peppier, Mache Bowl, Elephant Garland, Salt & Pepper, Drawing Instruments, Egg shell flowers, Happy faces, Stencil Patterns, Paper Doilies, Odds & Ends, Plaques, Seed Necklace, Egg shell mosaic, Comb & Brush, Wax Crayons, Woven Hanging, Adding Shadows, Italic Letters	310 / 500

SEMESTER-II	Cubicate	Marks Obtained
Semester	Subjects	
	Chalk Drawings, Paper Folding, Stencil Fun, Shadow Portrait, Decorated letters, Cardboard loom, Roly-Poly people, Crayon Windows, Balancing Windows, Cartoon Animals, Seeing double, Woolly chick, Marbling, Peppier Mache Box, Dancing Bear, Cloth picture, Puppet Theatre, Chalk and Crayon, Night lights, stained glass, Near & Far, Water colors, Talking Words, Vanishing Point, silhouettes, Hands and Feet, drawing an oval, Running Duck, Drawing Sections Twist Outs, Blossom, Calligraphy, Stencil fun, Pingushion, Glove Puppets, 3-D College, Writing Well, Wind Chimel Glay Lantern	300 / 500

61% Percentage В Grade Pass Remarks 50% Passing Marks

Date of Issue

July 24, 2009

1000 otal Marks larks Obtained 610

E.O / DIRECTOR



SKILL DEVELOPMENT COUNCIL LAHORE.







(A JOINT PROJECT OF THE NATIONAL TRAINING BUREAU GOVERNMENT OF PAKISTAN, WORLD BANK, I.L.O. AND E.F.P.)

No: SDCL-2(54)-2011

11Feb, 2011

SUBJECT: - Verification of Diploma/Certificate

The Certificate /Diploma for Drawing Master (D.M) Course issued to Miss Shamim Ara D/O Khaisata Rahman bearing registration# SDCL-Aimms/Mardan-33733/Roll No:033428 conducted at Abbaseen Institute of Medical & Modern Sciences, Mardan is genuine and hereby verified.

Yours truly,

Najeeb Aslam Arain Manager Student Affairs Manager (Student Affairs) Skill Development Council Punjab 397-A-I, Gulberg-III, Near Ghalib Market Lahore.

All of the state o

ten Aninersily Clama Agbal E

Sslamabad



197442 Serial No

Certified that Ma / Mr. SHAMIM ARA

San / Daughter of

KHAISTA RAHMAN

Registration Na 10ABR00367 Roll Na A1452179

Gemester Sining 2012 having met all the requirements under

the semester system is this day awarded the degree of

Bachelor of Arts **Group - General**

He / She has secured

and has been placed in

Controller of examinations

Result declared on:

January 23, 2013

Date of issue:

May 28, 2014



VICE-CHANCELLOR

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD

Serial No.

317700

PROVISIONAL RESULT CARD

Roll No. ...

AI452179

Final Semester

Registration No. 10ABR00367 SPR-2012

Name

SHAMIM ARA

Father's Name KHA1STARAHMAN

Address SHERGHAZAN SHOPKEEPER SHANGUS MARKET KHAR P/O KHAR BARANG

Tehsil

BAJOR AGENCY

District

BAJOR AGENCY

has successfully completed

BACHELOR OF ARTS GROUP-GENERAL

The detail of pass	ed courses	is as under:		
Semester Course		Title of Course	Marks	
	Code	Title of Course	Maximum	Obtained
AUT- 10	1423	COMPULSORY ENGLISH-I	100	55
AUT- 10	0417	PAKISTAN STUDIES(C)	100	61
AUT- 10	0416	ISLAMIAT (C)	100	66
AUT- 10	0413	SOCIOLOGY-II	100	70
SPR- 11	0419	EDUCATION	100	60
SPR- 11	0407	MODERN MUSLIM WORLD	100	68
AUT- 11	0436	SEERAT-E-TAYYABA	100	67
AUT- 11	1424	COMPULSORY ENGLISH-II	1.00	61
AUT- 11	0487	CHILD DEVELOPMENT	100	59
SPR- 12	0406	ECONÔMICS OF PAKISTAN	100	71
SPR- 12	0437	ISLAMIC STUDTES (É)	100	55
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CREDITS:

Total Marks / Obtained

1100/ 673

Result Declared on

JANUARY 23, 2013

Percentage / Grade

63

Date of issue

FEBRUARY 01, 2013

Disclaimer:

ontroller of Examinations

This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.

Allama Ighal Open University



233098

Certified that Mr. / Ms. SHAMIM ARA

Son / Daughter of KHAISTA RAHMAN

Registration No:

10ABR00367

Roll No: AU671640

having successfully completed the prescribed requirements

in semester

SPRING 2014

is awarded the degree of

Bachelor of Education (B.Ed)

He/She has secured 68

% marks and has been placed in

grade.

CONTROLLER OF EXAMINATIONS

Result declared on: January 16, 2015

Date of Issue: January 06, 2016

ICE-CHANCELLOR

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD

626189 Serial No.

PROVISIONAL RESULT CARD

BACHELOR OF EDUCATION(B.ED)



Name

SHAMIM ARA

Father's Name KHAISTARAHMAN

Address SHERGHAZAN SHOPKEEPER BHANGUS MARKET

KHAR F/G KHAR BARANG

Tehsil

14.44

District

BALIGR AGENCY

has successfully completed

Registration No. 10ABR00367

AU671640

Final Semester

SPR-2014

AUT- 13 0513 SCHOOL DREANIZATION 100 AUT- 13 0518 ENGLISH (COMPULSORY) 100 AUT- 13 0518 EDUCATIONAL PSYCHOLOGY & CURRICULUM 100 AUT- 13 0512 FERSPECTIVES OF EDUCATION 100 AUT- 13 0552 ISLAM, PAKISTAN AND MODERN WORLD 100 AUT- 13 0514 EVALUATION, GUIDANCE & RESEARCH 100 SPR- 14 0555 WORKSHOP & TRACHING PRACTICE 100 SPR- 14 0557 TEACHING FRANTAL STORKES 100	Marks			
AUT- 13 0651 ENGLISH (COMPULSORY) AUT- 13 0618 EDUCATIONAL PSYCHOLOGY & CURRICULUM 100 AUT- 12 0512 PERSPECTIVES OF EDUCATION 100 AUT- 13 0652 ISLAM, PAKISTAN AND MODERN WORLD 100 AUT- 13 0514 EVALUATION, GUIDANCE & RESEARCH 100 SPR- 14 0655 WORKSHOP & TRACKING PRACTICE 100 SPR- 14 0664 TEACHING ISLAMAT 100 TEACHING F PARTAM STEELES 100	Obtaine			
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CREDITS:

JANUARY 16, 2015

Percentage / Grade

Total Marks / Obtained

900

Date of issue

Result Declared on

JAMUARY 20, 2015

Controller of Examinations

This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the

UNIVERSITY OF MALAKAND 22

PAKISTAN







Session 2013-2015

SHAMIM ARA Paughter of KHAISTA RAHMAN Registration No. 2002760187 Private Candidate of Bajaur Agency having passed the prescribed examination held in Aug. 2016 under Roll No. 2067 is admitted by the University of Malakand to the degree of

Master of Arts

in Islamiyat in Second Division

The examination was taken in parts.

Controller of Kxaminations

Result Beclared on

04-Jan-2017

Issuance Bate

13-Mar-2018

And the state of t

Countersigned

Dice Chancellor





University of Malakand Pakistan

DETAILED MARKS CERTIFICATE

Serial No.

Name:

SHAMIM ARA

Duplicate

Father's Name:

KHAISTA RAHMAN

Registration No.

2002760187

College/District:

Private Candidate Malakand Agency

Address:

Vill: & P/O Hisar Baba Totakan Teh: Batkhela Mkd Agency

Master of Arts in Islamiyat

Descrions	Marks	Marks	Remarks
	100	48	PASSED
	100	- 44	PASSED
	100	71	PASSED
	100	63	PASSED
	100	77	PASSED
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Paper-X	ISLAN	4 & MODE	RN ECONOMICS THOUGH	T & ISLAMIC LAW OF INHERITANCE	100	40	PASSED
Paper-VII			ISLAMIC JURISPRUDENC	E Me	100	49	PASSED
Paper-VIII			HER WORLD RELIGIONS	1 Kle	- 100	43	PASSED
Paper-IX			HILOSOPHY OF ISLAM	100	100	40	PASSED
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Examin	ation h	eld from /	Aug 02 To Aug 31, 2016	Result Speak. Passed	1100	570	2nd Division

The examination was taken in Parts

Errors and Ommissions are subject to subsequent rectification.

Issuance Date:

17-Jan-2018

Prepared by:

Amjad Shahzad

Checked by:

Controller of Examinations University of Malakand

(For use in Police Department only)

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Note:	The entries in this page should be renewed or re-estessed at least every five years and the Signature to Mans 3 am 10 should be deted.
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#### General Seniority List of Fe-male Drawing Masters (DMs) of Bajaur Agency for Promotion

S.No	Seniority No	Name of Teacher	Acadmic	Professional	Date of declaration of prof: Qualification	Father Name	, Designation	BPS	Date of Birth	Domicile	Date 1st Entry into Govt: Service	Date of Appointment on the present post	I Place of posting	Remarks
1	1	Zareen Taja	ВА	DM	11-May-99	Habib Rasool	SDM	16	01-Jan-76	Mardan	23-Nov-00	23-Nov-00	GGMS Pashat	Promoted to SST
2	2	Fouzia	ВА	DM	31-May-01	Taj Muhammad	SDM	16	01-Jan-80	Malakand	26-Sep-02	26-5ep-02	GGHS Khar	Promoted to SST
3	3	Samina Bibi	ВА	DM	05-May-03	Taj Muhammad	SDM	16	15-Mar-78	Malakand	24-Dec-99	05-May-03	GGMS Civil Colony Khar	
4	4	Samia Syed	FA	DM	05-May-03	Lal Said	SDM	16	02-May-79	Bajáur	22-Mar-00	05-May-03	GGMS Bandagai	
5	5	Nigahat sima	ВА	DM+ B.Ed	20-Jun-05	Shah Jehan Badshah	SDM	16	10-May-77	Bajaur	25-Nov-04	25-Nov-04	GGMS Sadiq Abad	
6	6	Zainab Begum	ВА	DM+B.Ed	31-Mar-01	Shad Muhammad	SDM	16	01-Mar-80	Malakand	25-Nov-04	25-Nov-04	GGMS Bar Khalozo	
7	7	Asia	ВА	DM+B.Ed+M.Ed	22-Jun-05	Janat Gul	SDM	16	10-Apr-81	Malakamd	25-Nov-04	25-Nov-04	GGMS Khona	
8	8	Rukhsana	ВА	DM	31-Mar-02	Noorul Haq	SDM	16	14-Mar-79	Malakand	12-Apr-07	12-Apr-07	GGMS Nari Tangi	
9	9	Neelam Umar	MA	DM+M.Ed	24-Jun-05	Muhammad Umar	DM	15	07-Apr-85	Malakand	12-Apr-07	13-Apr-07	GGMS Inayat Killi	Died
10	10	Shamim Ara	ВА	DM	24-Jul-09	Khaista Rahman	DM	15	03-May-82	Bajaur	01-Sep-03	24-Jul-09	GGMS Raghgan	
11	11	Kalsoom Begum	ВА	DM	31-Dec-09	Muhib Ullah	DM	15	07-Mar-81	Bajaur	01-Sep-03		GGMS Shah Nari	
12	12	Faiza Gul	ВА	DM	09-Aug-10	Zarmola	ВΜ	15	09-Jan-86	Bajaur	05-Jun-09	09-Aug-10	GGMS Ghazi Baba	
13	13	Fazilat Bibi	FA	DM	10-Oct-16	Rahman Ghani	DM	15	06-Sep-85	Bajaur	02-Mar-06	13-Apr-16	GGMS Zarif Abad Gardai	
14	14	Farzana Habib	MA	DM		Habibur Rahman	DM	15	03-01-89	8ajaur	27/1/2014	27/1/2015	GGMS CC Khar	

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بخدمت جناب ڈائر یکٹرصاحب ایجویشن فاٹاسکرٹریٹ بیاور ۔ بواسطت ایجنی ایجویشن آفیسرصاحب باجوڑا یجنی کور

درخواست برائے اپیل۔

عنوان۔

جناب عالى!

مود باندگزارش ہے۔ کہ ماکلہ بحثیت D.M پوسٹ پر بمورخہ 01/09/2003 وی رہی ہے۔
ساکلہ نے D.M ڈیلومرسکیل ڈویلیپنٹ کونسل لا بھورے بمورخہ 24/07/2009 میں کیا ہے۔
آپ حاجبان نے اس ڈیلومہ پر ساکلہ کو Train تصور کیا۔ چونکہ اب سائل کی BPS-16 کو پر وموثن ہے مگر جناب ڈائر کیٹر صاحب آفس سے ساکلہ کو پر وموثن لیسٹ سے فارج کیا گیا ہے۔

لہذاآپ صاحبان کے حضور میں ہدردانہ وض کی جاتی ہے۔ کہ آپ ماحبان مہر بانی کر کے سائلہ کومیر ٹ لیسٹ میں دوبارہ شامل کرکے سائلہ کو BPS-16 میں ترتی دینے کے احکامات صادر فرمائے۔ تاحیات دعا گورمیکی۔

العارض_ مساة شيم آر D.M گورنمنث كراز باكى سكول خار باجوز ايجنسى-

. Than Aois well

Attested

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# Bajaur at Khar

Ńо	Dated	//2018
Email <u>aeobajaur@gamil.com</u>	Voice & F	ax +92942220395

#### **NOTIFICATION:**

Consequent upon Notification issued by the Director Education FATA Peshawar vide No. 2161-90/File No. 1/Promotion Senior dated 31/05/2018, the recommendation of Departmental Promotion Committee and in pursuance of the government of Pakistan Finance Division (Regularization Wing) Notification No.1(32) R-1/2015 -582-2016 dated 25/07/2016 Islamabad, So (Edu) Notification No. FS/SO/(Edu) SSD/Up gradation /2882-94 dated 22/06/2016 and duly endorsed by Director Education FATA No. 8121-30 dated 08/08/2016. The following **DM (F) BPS-15** are hereby promoted to the post of **Sr.DM (F) BPS-16** (Rs.18910-1520-64510) plus usual allowance under regular basis on terms & condition given below with effect from 31/05/2018 and the recommendation of Placement Committee, they are here by posted against newly upgraded **Sr.DM BPS-16** posts in the Govt: High Schools in the interest of public service.

S.No	Name of Teacher	Name of School / Place	Posted / Adjusted	Remarks
1	Kalsoom Begum	GGMS Chinagai	GGHS Pahsat	AVP

#### Terms & Condition.

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

29 106 / 2018

(Amrullah Wazir) Agency Education Officer Bajaur

Endst No: <u>9973-77</u> Dated

Copy of the above is forwarded to the:

- 1. Director of Education FATA w/reference of his notification as quoted above.
- 2. Principal / Headmistress concerned.
- 3. Agency Accounts Officer Bajaur.
- 4. AAEOs Concerned.
- 5. Teacher Concerned.

Agency Education Officer
Baiaur

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