

**BEFORE THE HONOURABLE KHYBERPAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. 1000/2023

Shahida Wali, SPET(BPS-16), District Mansehra.....Appellant

VERSUS

**Govt; of Khyber Pakhtunkhwa through Chief Secretary &
others.....Respondents.**

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*06-03-2024
Peshawar*

(Samina Altaf)
**(SAMINA ALTAF)
DIRECTOR**

E&SE Department Khyber
Pakhtunkhwa, Peshawar.

**BEFORE THE HONOURABLE KHYBERPAKHTUNKHWA
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others.....Respondents.**

JOINT PARAWISE COMMENTS ON BEHALF OF RESPONDENTS No: 1-4.

Respectfully Sheweth :-

The Respondents No. 1-4 submit as under: -

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 11018

Dated 06-02-2024

PRELIMINARY OBJECTIONS

- 1 **That** the Appellant has got no cause of action/locus standi to file instant appeal against the Respondent Department.
- 2 **That** the appellant is not an aggrieved person within the meaning of Section-4 Khyber Pakhtunkhwa Service Tribunal Act 1974 read with Article-212 of the constitution of Islamic Republic of Pakistan 1973.
- 3 **That** the appellant has concealed material facts from the ambit of this Honorable Tribunal in the titled appeal.
- 4 **That** the appellant has not come to this Honorable Tribunal with clean hands.
- 5 **That** the appeal in hand is based on mala fide intentions for gaining illegal service benefits from the Department in violation of the Rules & Policy.
- 6 **That** the appeal in hand is barred by law and limitation Act, 1908.
- 7 **That** the appeal in hand is bad for mis-joinder and non-joinder of the necessary parties.
- 8 **That** the appeal is not maintainable and even incompetent in the eyes of Law, Rules & Policy in vogue.
- 9 **That** the Notification dated 31-05-2019 is legally competent & liable to be maintained in favor of the Department.
- 10 **That** the appellant is not entitled for promotion against the BPS-17, 18 & 19 posts with retrospective effect under the Rules, Criteria & Policy in vogue
- 11 **That** as per seniority list dated 30-11-2018 SPETs in BPS-16, the appellant has been placed at seniority list No: 149, whereas, the Department has promoted SPETs in BPS-16 to the post of DPEs in 17 up to the Seniority list No. 108 under the Rules & Policy.

ON FACTS

- 1) That Para-1 pertains to the service record of the appellant against the PET in BPS-9 post inducted vide Notification dated 08-08-1995 with her subsequent up gradation in BPS-14 in the year 1999 by the Department under the Rules.
- 2) That Para-2 pertains to the academic record of the appellant during her service in the Department which is also subject to the production of NOC/Departmental permission of the competent authority.
- 3) That Para-3 is incorrect, hence, denied as against the factual position that the correct date of appointment as PET is 08-08-1995 with her date of regularization as PET is 24-04-2000 & her subsequent promotion to the post of SPET is 26-02-2013 as per available record mentioned in the final seniority list at S.No. 149 dated 30-11-2018 of the SPET (F) in BPS-16 maintained by the Department with further submission that the Department has allowed promotion to the DPEs in BPS-17 till the seniority list No. 108 namely Asifa Shahdab under the Rules *attached as Annex-A* for ready reference.
- 4) That Para-4 is correct that vide Notification dated 24-07-2014 formal Service Rules were notified by the Department with reference to Serial No. I/A, whereby, the way out of promotion from SPETs BPS-16 to DPEs BS-17 was made by the Department. (*attached as Annex-B*).
- 5) That Para-5 is correct to the extent of Notification dated 23-02-2017 *Annex-C*, whereby, the appellant was adjusted as DPE BS-17 in her own pay & scale which does not accrued any legal & vested rights of promotion to the appellant for her regular promotion as DPE against existing Rules, Criteria & Policy in vogue.
- 6) That Para-6 is incorrect & denied on the grounds that submission of ACRs etc by the appellant in response to the Department letters dated 14-10-2017 & 31-10-2017 do not confer any legal right of promotion to the appellant as replied by the Department vide letter dated 20-10-2023 *attached as Annex-D*.
- 7) That Para-7 is incorrect on the grounds that the stand of the appellant is illegal, the following table will negate the plea of the appellant which is as under:

S.No	Name	D/O 1 st appointment as PET	D/O regular appointment as PET
1	Mst. Dilshad Akhtar	15-09-1988	22-10-1991
2	Mst. Shehnaz Parveen	15-04-1992	30-08-1996
3	Mst. Naseem Akbar	01-03-1993	13-05-1997

4	Mst. Khalida	17-07-1993	13-05-1997
5	Mst. Kausar Parveen	07-01-1984	11-05-1999
6	Mst. Farzana Begum	17-11-1992	11-05-1999
7	Mst. Shadab	06-10-1994	11-05-1999
8	Mst. Shahida Wali	08-08-1995	25-04-2000

The appellant has concealed facts regarding her regular appointment in the Department as PET & is junior most to the female SPETs promoted on the basis of their regular appointments as mentioned in the table, whereas, the regular appointment of the appellant is 25-04-2000, hence, claim of the appellant is illegal & liable to be rejected.

- 8) That Para-8 is also incorrect as the plea of the appellant is mis-leading in view of the fore made facts submitted by the Department in the instant reply before this Honorable Tribunal,
- 9) That Para-9 is correct to the extent of filing of Departmental Appeal to the Department which was disposed of vide letter dated 20-10-2023 under the Rules & Policy.
- 10) That Para-10 is incorrect as the appellant is not an aggrieved person within the meaning of Section-4 of Khyber Pakhtunkhwa Service Tribunal Act, 1974, hence, the appeal in hand is liable to be dismissed on the following grounds inter alia: -

ON GROUNDS

- A. ***Incorrect & not admitted.*** the Notification dated 31-05-2019 is within legal parameter wherein, the appellant could not made out her case for promotion in upper scales under the Rules & Policy. ***Attached as Annex-E.***
- B. ***Incorrect & not admitted.*** the act of the Department with regard to the service record of the appellant & Notification dated 31-05-2019 is legal & in accordance with the provision of Articles 04 & 25 of the constitution of 1973.
- C. ***Incorrect & not admitted.*** the plea of the appellant is illegal & even against the rules & Policy.
- D. ***Incorrect & not admitted.*** the appellant is junior most against the Private Respondents in the afore cited seniority, hence, did not promoted in the Notification dated 31-05-2019.
- E. ***Incorrect & not admitted.*** the act of the Department with regard to the Notification dated 31-05-2019 is in accordance with the provision of Article 38(c) of the constitution *ibid.*

F. Incorrect & not admitted. the stance of the appellant is illegal as the Department has acted legally in the titled matter.

G. Incorrect & not admitted. the appellant is not an aggrieved person in the titled matter in view of the fore made submission by the Department, hence, also seek leave of this Honorable Tribunal to submit additional grounds, case law & record at the time of arguments.

PRAYER.

In view of the above made submissions, it is requested that this Tribunal may very graciously be pleased to dismiss the instant service appeal with cost in favor of the Respondent Department.

Dated ___/ ___/2024.


(SAMINA ALTAF)
DIRECTOR

E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondents No: 3 & 4).


(MASOOD AHMAD)
SECRETARY

E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondents No: 1 & 2).

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AFFIDAVIT

I, Samina Altaf, Director E&SE Khyber Pakhtunkhwa, do hereby solemnly affirm & declare on oath that the contents of the instant para wise Comments are true & correct to the best of my knowledge & belief. It is further stated on oath that in this appeal the answering Respondents have neither been placed Ex-Parte nor their defense has been struck off/cost.


(SAMINA ALTAF)
DIRECTOR

E&SE Department Khyber
Pakhtunkhwa, Peshawar.

ATTESTED



06-02-2024

Serial No	Name of Teacher	Name of School	Design	Domicile	Date of Birth	Date of 1st Appointment	Date of Appointment as PET (Regular)	Date of Promotion as Senior Physical Education Teacher	Academic Qualification	Professional Qualification
1	2	4	5	6	7	8	9	10	11	12
1	NAHEED BEGUM	GGHS WAZEER BAGH	SPET	PESHAWAR	01/06/1960	25/03/1982	25/03/1982	01/03/2013	BA	JDPE
2	HUSSAN ARA	GGHS DIHERI	SPET	MKD	05/03/1962	11/11/1981	21/05/1985	21/02/2013	BA	JDPE
3	BUSHRA BEGUM	GGCMHS THANA	SPET	MKD	01/12/1961	01/06/1982	21/05/1985	21/02/2013	BA	JDPE
4	MIRAJ BIBI	GGHS PARMOLI	SPET	SWABI	08/01/1963	23/10/1982	21/05/1985	21/02/2013	BA	JDPE
5	NOOR JEHAN	GGHS DAGAI	SPET	SWABI	30/08/1965	02/03/1985	21/05/1985	21/02/2013	BA	JDPE
6	BAKIJT IMAL	GGHS SHAHDARA	SPET	SWAT	15/04/1960	19/11/1979	05/03/1986	21/02/2013	BA	JDPE
7	SAFIA BIBI	GGCMHS DANIN	SPET	CHITRAL	04/02/1964	20/06/1982	25/03/1986	21/02/2013	MA	JDPE
8	MUSARRAT YASMIN	GGHS SURATI KILLA	SPET	KARAK	05/07/1965	28/11/1983	25/03/1986	07/03/2013	BA	JDPE
9	GUL NARGIS	GGHS JEHANGERA	SPET	SWABI	24/02/1964	02/07/1984	25/03/1986	21/02/2013	BA	JDPE
10	RUKHSANA SHAHEEN	GGSH HATTAR HR	SPET	HARIPUR	06/08/1962	08/07/1986	08/07/1986	21/02/2013	MSC HPE	JDPE/B.Ed/M.Ed
11	RASHIDA BEGUM	GGHSS CHOKARA	SPET	KARAK	01/03/1963	22/02/1982	07/08/1986	07/03/2013	BA	JDPE
12	SABIHA	GGHSS GANDIGAR	SPET	DIR UPPER	10/08/1962	23/10/1983	07/08/1986	28/02/2013	BA	SDPE
13	SHAIANA TABASUM	GGCMHS NO 3 KOHAT	SPET	KOHAH	1/09/1961	24/09/1986	24/09/1986	21/02/2013	BA	JDPE
14	RUKHSANA KOUSAR	GGCMHS NAUTHIA	SPET	PESHAWAR	14/10/1959	12/09/1978	02/12/1986	21/02/2013	BA	JDPE
15	SHEJNAZ FARZANA	GGMS MADNE TAWON	SPET	DIKHAN	16/10/1962	19/12/1989	19/12/1989	22/02/2013	BA	SDPE
16	RUBINA GUL	GGHS JOLIAN HARIPUR	SPET	HARIPUR	22/07/1969	11/04/1990	11/04/1990	21/02/2013	MA	JDPE/BED
17	FARZANA BIBI	GGCMS KOT NAJIBULLAH HARIPUR	SPET	HARIPUR	20/06/1965	07/02/1985	16/05/1990	21/02/2013	BA	SDPE
18	FOUZIA ANJUM	GGHS SINGOOR	SPET	CHITRAL	12/12/1971	10/02/1990	21/10/1991	21/02/2013	B.A	JDPE/B.Ed
19	SAFIA BEGUM	GGHSS RABAT	SPET	DIR LOWER	10/01/1967	18/03/1985	22/10/1991	21/02/2013	BA	JDPE
20	FAIZA NOUREEN	GGMS PAF BASE KOHAT	SPET	KOHAH	02/02/1965	16/09/1987	22/10/1991	21/02/2013	B.A	JDPE/B.Ed
21	DILSHAD AKHTAR	GGHS MIRPUR	SPET	Abbottabad	03/01/1965	15/09/1988	22/10/1991	21/02/2013	M.Sc HPE	JDPE
22	NASREEN SULEMAN	GGHS MIRPUR HARIPUR	SPET	HARIPUR	03/04/1964	17/10/1989	22/10/1991	02/03/2013	MSC HPE	BED
23	FARHAT BIBI	GGHS MANGLOOR	SPET	MANSEHRA	10/04/1969	24/05/1990	22/10/1991	26/02/2013	BA	JDPE
24	GUL SARA	GGHS MULDEH	SPET	CHITRAL	01/04/1964	06/06/1990	22/10/1991	21/02/2013	B.A	JDPE/B.Ed
25	SAFINA ANJUM	GGHS K.S.K	SPET	SWABI	15/06/1968	21/02/1991	22/10/1991	21/02/2013	MSc HPE	JDPE/BED
26	FARHAT JAHAN	GGHSS TARU JABBA	SPET	NOWSHERA	18/04/1967	21/01/1990	22/03/1992	01/03/2013	BA	JDPE
27	SHAMIM AKHTAR	GGHS NO.5 DIKHAN	SPET	DIKHAN	02/02/1966	18/05/1992	18/05/1992	28/05/2013	MSC (HPE) 3rd DIV	SDPE
28	MUALLAH BIBI	GGHS ALLAHDAND	SPFT	MKD	04/07/1962	26/07/1982	09/01/1995	21/02/2013	BA	JDPE
29	AZRA BIBI	GGHSS NO.2 KTS HARIPUR	SPET	HARIPUR	04/05/1970	31/10/1995	31/10/1995	02/03/2013	MA	B.Ed/MED/SPDE
30	ZAHIDA	GGHSS KORYA	SPET	BUNER	14/01/1977	23/11/1995	23/11/1995	06/12/2014	MA	JDPE/B.ED
31	YASMEEN AKHTAR	GGHS KOGHUZI	SPET	CHITRAL	13/03/1967	03/06/1991	25/05/1996	21/02/2013	M.A	JDPE/B.Ed
32	SHAHIDA JADOON	GGHS NO.2 A/ABAD	SPET	Abbottabad	25/12/1972	25/05/1992	25/05/1996	21/02/2013	M.Sc HPE	JDPE/B.Ed/M.Ed
33	TILAJ BEGUM	GGHS ISMAILA	SPET	SWABI	01/04/1969	17/02/1991	27/05/1996	21/02/2013	MSc HPE	JDPE/BED
34	SHAHEEN ARA	GGCMHSS KATLANG	SPET	MARDAN	22/10/1965	22/04/1990	30/08/1996	21/02/2013	MA	JDPE
35	NAHEED BEGUM	GGHS YAR HUSSAIN	SPET	SWABI	03/04/1972	02/03/1992	30/08/1996	24/03/2017	MSc HPE	JDPE
36	FARHAT AFROZ	GGHS,PIR PIA	SPET	NOWSHERA	01/01/1970	17/03/1992	30/08/1996	28/02/2013	M.Sc HPE	JDPE/B.Ed
37	FARIDA BEGUM	GGHS SHALA KHEL	SPET	NOWSHERA	14/02/1968	21/03/1992	30/08/1996	18/08/2016	M.A	JDPE
38	SHAJINAZ PARVEN	GGHSS QASMI	SPET	MARDAN	13/04/1973	15/04/1992	30/08/1996	21/02/2013	MA MPEd	JDPE
39	AALIJA RUBAB	GGHS, MALANA	SPET	DIKHAN	01/02/1970	06/05/1992	30/08/1996	21/08/2017	M.Sc HPE	JDPE/SDPE/B.Ed

Attested
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Seniority	Name of Teacher	Name of School	Design	Domicile	Date of Birth	Date of 1st Appointment	Date of Appointment as P.T. (Regular)	Date of Appointment as Senior Physical Education Teacher	Academic Qualifications	Professional Qualifications
1	2	4	5	6	7	8	9	10	11	12
40	NAGEENA SHAIHEEN	GGHS DHEENDA HARIPUR	SPET	HARIPUR	18/02/1970	12/05/1992	30/08/1996	21/02/2013	MSC/HPE	JDPE/B.Ed
41	ZAKRIA BIBI	GGHS NO.2 HARIPUR	SPET	HARIPUR	01/01/1969	21/05/1992	30/08/1996	21/02/2013	MA	JDPE/MED B.Ed
42	SHAISTA BIBI	GGHS CHAPRA	SPET	HARIPUR	13/03/1971	24/05/1992	30/08/1996	02/03/2013	MA	JDPE/BED MED
43	ILADIA BEGUM	GGHSS NO.1 MARDAN	SPET	MARDAN	16/08/1970	27/05/1992	30/08/1996	21/02/2013	MA	JDPE/B.Ed/M.Ed
44	MUSARRAT BIBI	GGHS YAQUBI	SPET	SWABI	26/04/1970	06/06/1992	30/08/1996	21/02/2013	BA	JDPE BED
45	SEEMA ANDALEEB	GGHS SIHERKOT	SPET	KOHAT	26/01/1974	30/03/1992	04/09/1996	21/02/2013	M.Sc HPE	SDPE/B.Ed
46	ZAINAB BIBI	GGHS MANKI	SPET	SWABI	17/03/1978	16/02/1997	16/02/1997	19/08/2017	BA	JDPE BED
47	SAIMA HUMA	GGHSS NO.2 KTS HARIPUR	SPET	HARIPUR	11/05/1970	16/12/1989	13/05/1997	21/02/2013	BA	SDPE
48	SAEEDA KHATOON	GGHS BOONI	SPET	CHITRAL	22/11/1971	16/05/1990	13/05/1997	21/02/2013	B.A	JDPE.B.Ed
49	NIHAR YASMIN	GGHS ZAIDA	SPET	SWABI	01/01/1972	11/01/1992	13/05/1997	21/02/2013	MA	JDPE BED
50	SHABANA	GGHS JOGIWARA	SPET	PESHAWAR	01/01/1971	01/04/1992	13/05/1997	21/02/2013	BA	JDPE
51	AMINA PERVEEN	GGHSS ATD	SPET	Abbottabad	11/04/1968	19/05/1992	13/05/1997	21/02/2013	MA	JDPE/B.Ed
52	RIZWANA	GGMS UMER KHANA	SPET	HARIPUR	20/09/1972	23/05/1992	13/05/1997	21/02/2013	BA	JDPE/BED
53	ZOUFISHAN	GGHS SIRRIKOT HARIPUR	SPET	HARIPUR	23/03/1963	24/05/1992	13/05/1997	21/02/2013	MSC/HPE	JDPE BED MED
54	MAH JABEEN	GGHS NO. 1 KOHAT	SPET	KOHAT	6/05/1970	1/01/1993	13/05/1997	21/02/2013	BA	JDPE
55	NASIM AKBAR	GGHSS CHAKDARA	SPET	DIR LOWER	08/06/1971	01/03/1993	13/05/1997	21/02/2013	M.A/M.Sc HPE	JDPE
56	MOBEEN AKHTAR	GGHS BALDHER HARIPUR	SPET	HARIPUR	22/09/1972	21/04/1993	13/05/1997	21/02/2013	MSC/HPE	JDPE/B.Ed/MED
57	NARGIS	GGHS MANERI BALA	SPET	SWABI	04/01/1974	23/05/1993	13/05/1997	21/02/2013	M.Sc HPE	JDPE/B.Ed MED
58	NASREEN AKHTAR	GGHS NOORDI HARIPUR	SPET	HARIPUR	10/03/1962	13/06/1993	13/05/1997	21/02/2013	B.A	JDPE
59	KHALIDA	GGHS GANORI	SPET	DIR UPPER	02/03/1973	17/07/1993	13/05/1997	28/02/2013	M.Sc HPE	JDPE/BED
60	SAFINA YASMEEN	GGCMHS, NO 1 DIKHAN	SPET	DIKHAN	10/04/1974	24/06/1997	24/06/1997	22/02/2013	MSC (HPE:)	BED JDPE
61	BIBI HAFIZA	GGHS BARENIS	SPET	CHITRAL	15/03/1976	25/06/1997	25/06/1997	22/08/2016	M.A	JDPE/B.Ed
62	SHEREEN SALMA	GGMS, GANDI UMAR KHAN	SPET	DIKHAN	12/11/1966	01/11/1990	01/07/1997	22/02/2013	BA	JDPE
63	NADIA SHAIHEEN	GGMS, MALANG ABAD	SPET	DIKHAN	06/12/1975	03/09/1995	01/07/1997	22/02/2013	FA	JDPE
64	ROBEENA NOOR	GGHS BASHIR KHAN QILLA	SPET	CHARSADDA	12/09/1976	01/07/1997	01/07/1997	21/02/2013	BA	JDPE
65	SHAMIM AKHTAR	GGMS Zarif Kore	SPET	Mohmand	03/10/1971	16/01/1995	01/01/1998	20/02/2013	BA	JDPE
66	SHEHNAZ BEGUM	GGCMHS TEHKAL BALA	SPET	PESHAWAR	01/05/1959	09/01/1998	09/01/1998	26/03/2013	M.Sc HPE	JDPE
67	YASMEEN BEGUM	RITE COLLEGE CHARSADDA	SPET	CHARSADDA	01/01/1961	01/02/1986	17/01/1998	18/02/2003	BA	SDPE
68	SAMAR BIBI	GGHS KOTKA ZABAT KHAN BANNU	SPET	BANNU	01/01/1972	19/01/1998	19/01/1998	25/03/2013	M.Sc HPE	JDPE/B.Ed
69	YASMEEN NAZ	GGHS NO.2 NSR KALAN	SPET	NOWSHERA	10/10/1967	10/03/1993	27/02/1998	01/03/2013	MA	JDPE
70	GUL FEROZA	GGHS BALAKOT	SPET	MANSEHRA	02/02/1967	23/05/1992	28/02/1998	26/02/2013	M.Sc HPE	JDPE/B.Ed
71	ANEELA	GGHS JOGIWARA	SPET	PESHAWAR	06/01/1975	02/12/1998	02/12/1998	26/02/2013	BA	JDPE
72	ROBINA NAZ	GGHS HOTI NO2	SPET	MARDAN	10/09/1977	06/04/1999	04/02/1999	21/02/2013	BA	JDPE
73	ZAKIA BIBI	GGHS BHERA	SPET	HARIPUR	15/12/1974	09/04/1999	09/04/1999	18/08/2017	BA	JDPE
74	CHAMAN ARA	GGHS SAJKOTE Q/ABAD	SPET	Abbottabad	21/12/1976	20/04/1999	20/04/1999	21/02/2013	BA	JDPE
75	ZEENAT PERVEEN	GGHS MAHRA	SPET	DIKHAN	01/09/1974	23/04/1999	23/04/1999	22/02/2013	MA	JDPE/JDPE
76	RIZWANA KANWAL	GGHS D/KALAN	SPET	DIKHAN	15/10/1975	23/04/1999	23/04/1999	22/02/2013	M.Sc HPE	JDPE/SDPE B Ed
77	GUL-E-NARGIS	GGHS MITHA PUR	SPET	DIKHAN	01/06/1976	23/04/1999	23/04/1999	22/02/2013	BA	JDPE
78	HUSSAN BANO	GGHS YARIK	SPET	DIKHAN	12/09/1976	23/04/1999	23/04/1999	22/02/2013	BA	JDPE
79	UZMA REHMAN	GGHS KAICH	SPET	DIKHAN	05/05/1977	23/04/1999	23/04/1999	22/02/2013	BA	JDPE

Attested

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Seniority	Name of Teacher	Name of School	Desig.	Domicile	Date of Birth	Date of 1st Appointment	Date of Appointment as P.T. (Regular)	Date of Appointment as Senior Physical Education Teacher	Qualification	Present Post
1	2	4	5	6	7	8	9	10	11	12
80	SHAZIA NAZNEEN	GGMS WANDAMOCIIHWAL	SPET	DIKHAN	08/06/1977	23/04/1999	23/04/1999	22/02/2013	BA	JDPE
81	KAUSAR PERVEEN	GGHS SHAHPUR	SPET	SHANGLA	02/01/1964	07/01/1984	11/05/1999	03/01/2013	M.Sc HPE	JDPE
82	NAJMA SHAHEEN	GGHS KHOJAKI KILLA	SPET	KARAK	23/03/1969	13/12/1986	11/05/1999	07/03/2013	BA	JDPE
83	FOZIA SEEMA GUL	GGHS DABB	SPET	KARAK	05/12/1968	30/11/1988	11/05/1999	07/03/2013	BA	JDPE
84	SHABANA BIBI	GGHS NO.1 CANTT	SPET	PESHAWAR	08/10/1970	14/11/1990	11/05/1999	07/03/2013	MA	JDPE/B.Ed/MED
85	FARAH NAZ BEGUM	GGHS T/NASRATI	SPET	KARAK	01/03/1967	18/11/1990	11/05/1999	07/03/2013	BA	CT/JDPE/B.Ed.
86	SHAMIM ARA	GGHS GHUNDI KILLA	SPET	KARAK	16/04/1969	29/03/1992	11/05/1999	07/03/2013	BA	JDPE/SDPE
87	NAHEED	GGHS PANR	SPET	SWAT	15/09/1968	05/05/1992	11/05/1999	07/03/2013	BA	JDPE
88	KHADIJA BIBI	GGHS SHOGHORE	SPET	CHITRAL	10/03/1971	06/05/1992	11/05/1999	21/02/2013	M.A	JDPE
89	AFTAB JALAN	GGHS DROSH	SPET	CHITRAL	04/03/1964	10/05/1992	11/05/1999	21/02/2013	B.A	JDPE
90	SHAZIA RAFIQUE	GGHS CHATA BATA	SPET	MANSEHRA	01/01/1970	12/10/1992	11/05/1999	26/02/2013	BA	JDPE/B.Ed/M.ED
91	FAKZANA BEGUM	GGHS ZIARAT TALASHI	SPET	DIR LOWER	12/02/1974	07/11/1992	11/05/1999	21/02/2013	M.Sc HPE	JDPE
92	SHABNAM GOHAR	GGHS NAHAQI	SPET	PESHAWAR	25/08/1972	11/03/1993	11/05/1999	07/03/2013	BA	JDPE/B.Ed
93	GUL LALA	GGHS KOSHT	SPET	CHITRAL	01/04/1974	08/05/1993	11/05/1999	21/02/2013	M.A	JDPE/B.Ed
94	JALILA BIBI	GGHS QASIM TORU	SPET	MARDAN	01/05/1968	18/05/1993	11/05/1999	26/04/2017	BA	JDPE
95	ZUBAIDA KHATOON	GGHS Pir wal Khel	SPET	FR Kohat	13/02/1969	20/05/1993	11/05/1999	20/02/2013	MSc HPE	JDPE B.Ed/M.Ed
96	HASEENA BIBI	GGHS NO.2 BTKHELA	SPET	MKD	10/01/1973	10/07/1993	11/05/1999	21/02/2013	MA	JDPE/B.Ed
97	BIBI FATIMA	GGHS AYUN	SPET	CHITRAL	06/02/1971	17/07/1993	11/05/1999	21/02/2013	M.A	JDPE
98	BIBI HORAJRA	GGHS AWI BOONI	SPET	CHITRAL	03/05/1968	01/08/1993	11/05/1999	21/02/2013	B.A	JDPE
99	NAGINA GUL	GGHS KHAR	SPET	MKD	01/01/1971	09/08/1993	11/05/1999	21/02/2013	MA	JDPE
100	WAJIDA SHAISTA	GGHS NAHAQI GUL ABAD	SPET	CHARSADDA	03/10/1967	21/10/1993	11/05/1999	21/02/2013	MSC (HPE)	JDPE/B.Ed
101	KOUSAR PARVEEN	GGHS WARANA MOSAKAN	SPET	KARAK	01/01/1974	23/10/1993	11/05/1999	07/03/2013	M.A	JDPE/B.Ed. M.Ed. JDPE
102	BILQEES AKHTER	GGHS BORI SAGHRI	SPET	KOHAT	20/05/1966	24/10/1993	11/05/1999	21/02/2013	MA	JDPE/B.Ed.
103	SARWAT JEHAN	GGHS KHAIRABAD	SPET	NOWSHERA	20/01/1974	26/10/1993	11/05/1999	01/03/2013	MPED	JDPE/B.Ed
104	NARGUS BEGUM	GGMS Inayat Killi	SPET	Bajaur	08-May-74	01/11/1993	11/05/1999	20/02/2013	BA	JDPE
105	ABIDA PARVEEN	GGHS KANDARO	SPET	MKD:AGENCY	22/12/1970	11/05/1994	11/05/1999	21/02/2013	MA/M.Sc HPE	JDPE/B.Ed/M.Ed
106	PARVEEN BEGUM	GGHS DARGAI	SPET	MALAKAND	20/04/1971	18/09/1994	11/05/1999	21/02/2013	BA	JDPE/B.ED
107	HUMAIRA	GGHS Turki Ismail Khel	SPET	FR Kohat	03/05/1970	20/09/1994	11/05/1999	20/02/2013	BA	JDPE
108	ASIFA SHADAB	GGHS BEHZADI CHAKAR KOT	SPET	KOHAT	1/01/1973	5/10/1994	11/05/1999	21/02/2013	M.Sc HPE	JDPE
109	BIBI SHAHIDA	GGHS BROZE	SPET	CHITRAL	01/03/1968	30/10/1994	11/05/1999	21/02/2013	M.A	JDPE/B.Ed
110	ROZINA	GGHS BATHKHELA	SPET	MKD	01/01/1973	31/10/1994	11/05/1999	21/02/2013	BA	JDPE
111	ZAINAB BIBI	GGHS BARA BANDA	SPET	MARDAN	05/04/1974	01/11/1994	11/05/1999	01/03/2013	M.Sc HPE	JDPE/B.Ed
112	BIBI HASHIMA	GGHS MASTUJ	SPET	CHITRAL	06/10/1975	01/11/1994	11/05/1999	21/02/2013	M.A	JDPE/B.Ed
113	NUSRAT BEGUM	GGHS MALAKAND	SPET	DIR	27/02/1975	07/11/1994	11/05/1999	21/02/2013	MA	JDPE
114	NARIGIS BIBI	GGHS SIAL KOTE	SPET	Abbottabad	13/01/1972	08/11/1994	11/05/1999	21/02/2013	BA	JDPE
115	NAZIA BIBI	GGHS No. 2 Abbottabad	SPET	Abbottabad	26/01/1968	12/11/1994	11/05/1999	21/02/2013	M.Sc HPE	JDPE/B.Ed/M.Ed
116	RIFAT WAHAB	GGHS PALAI	SPET	MKD	01/01/1971	12/11/1994	11/05/1999	21/02/2013	BA	JDPE
117	NASEEM BEGUM	GGHS KORAGH	SPET	MARDAN	27/12/1973	12/11/1994	11/05/1999	21/02/2013	MPED	JDPE/B.Ed/M.Ed
118	ASMAT BIBI	GGHS KOKARAI	SPET	SWAT	06/01/1974	15/11/1994	11/05/1999	02/03/2013	M.Sc HPE	JDPE
119	PARVEEN BEGUM	GGHS KHANPUR	SPET	MKD:AGENCY	23/01/1968	16/11/1994	11/05/1999	21/02/2013	MA/M.Sc HPE	JDPE/B.Ed

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Serial No.	Name of Teacher	Name of School	Design	Domicile	Date of Birth	Date of Appointment	Date of Appointment as P.T. (Regular)	Date of Appointment as S. or Physical Education Teacher	Academic Qualification	Professional Qualification
1	2	4	5	6	7	8	9	10	11	12
120	ZAITOON FATMA	GGHS FAZAL ABAD KANJU	SPET	SWAT	09/08/1959	20/11/1994	11/05/1999	21/02/2013	MA	JDPE/B-Ed
121	HUMERA WARDAK	GGHS AMBADHER	SPET	CHARSADDA	01/01/1969	21/11/1994	11/05/1999	21/02/2013	MSc Political Science	JDPE/B.Ed/M.Ed
122	SAFIA MAJEED	GGHS GHALEGAY	SPET	SWAT	20/06/1973	21/11/1994	11/05/1999	02/03/2013	MSc HPE	JDPE/B.Ed
123	FATIMA BIBI	GGHS RESHUN	SPET	CHITRAL	30/01/1973	26/11/1994	11/05/1999	21/02/2013	MA	JDPE/B.Ed
124	AZRA GUL	GGHS BADWAN	SPET	DIR LOWER	13/3/1973	26/11/1994	11/05/1999	21/02/2013	M.Sc HPE	JDPE/B.Ed
125	SHAZIA SYED	GGHS MARGHUZ	SPET	SWABI	16/03/1976	15/12/1994	11/05/1999	21/02/2013	MSc HPE	JDPE
126	IQBAL SHAHEEN	GGCMHS KARAK	SPET	KARAK	21/10/1973	11/01/1995	11/05/1999	07/03/2013	BA	JDPE/B.Ed
127	FATIMA BIBI	GGHS ZARA MAINA	SPET	NOWSHERA	20/04/1967	14/01/1995	11/05/1999	01/03/2013	BA/MPED	JDPE
128	NAILA	GGHS AZAKHEL BALA	SPET	NOWSHERA	10/11/1969	15/02/1995	11/05/1999	01/03/2013	MA/MPed	JDPE/B.Ed
129	RAEES SHAGUFTA	GGHS TURANGZAI	SPET	CHARSADDA	05/04/1971	25/04/1995	11/05/1999	21/02/2013	MA/Islamiyat	JDPE/BED
130	DIL ARA	GGHS ALIZAI	SPET	PESHAWAR	06/08/1970	29/05/1995	11/05/1999	21/02/2013	BA	JDPE
131	FOZIA TAJ	GGHS MANKARAI HARIPUR	SPET	HARIPUR	10/04/1975	19/06/1995	11/05/1999	21/02/2013	M.Sc HPE	JDPE/BED
132	NASEEM BAGUM	GGHS Parachinar	SPET	Kurram	10/06/1968	11/05/1999	11/05/1999	20/02/2013	BA	JDPE
133	ANEELA SARDAR	GGHS Muhammad Hussain meli	SPET	FR Kohat	15/05/1968	08/09/1999	08/09/1999	20/02/2013	MA	JDPE/Bed
134	MEENA GUL	GGHSS DHAKKI	SPET	CHARSADDA	04/04/1969	01/11/1999	01/11/1999	17/05/2017	BA	JDPE
135	FARKHANDA NAZNEEN	GGHS RATTA KULACHI	SPET	DIKHAN	02/03/1978	13/11/1999	13/11/1999	28/05/2013	M.Sc HPE	JDPE
136	BIBI JAN	GGHS DHODA	SPET	KOHAT	06/01/1976	01/03/2000	01/03/2000	21/02/2013	M.A	JDPE
137	GHAZALA SHABNAM	GGHS HASSA	SPET	MANSEHRA	01/04/1969	23/04/1992	25/04/2000	26/02/2013	MA	JDPE/B.Ed/M.Ed
138	SALMA SHAHEEN	GGHS SADO	SPET	DIR LOWER	22/6/1972	07/05/1992	25/04/2000	21/02/2013	BA	JDPE/B.Ed
139	BIBI HAWA	GGHS WARIJUN	SPET	CHITRAL	04/05/1974	30/10/1994	25/04/2000	06/07/2015	MA	JDPE/B.Ed
140	KISHWAR NAZLI	GGHS ZARAKHELA	SPET	SWAT	10/04/1971	14/11/1994	25/04/2000	02/03/2013	M.Sc HPE	JDPE/BED
141	PARVEEN	GGHS KITYARI	SPET	MKD-AGENCY	02/04/1972	21/12/1994	25/04/2000	21/02/2013	MA	JDPE/B.Ed/M.Ed
142	RUKSANA SHAHEEN	GGHS THARAI	SPET	DIR LOWER	28/04/1974	21/12/1994	25/04/2000	21/02/2013	B.A	JDPE/BED
143	NARGAS NAZ	GGHS RAMORA	SPET	DIR LOWER	01/04/1976	10/01/1995	25/04/2000	21/02/2013	M.Sc HPE	JDPE/B.Ed/M.Ed
144	MUSARAT BIBI	GGHS KHADAGZAI	SPET	DIR LOWER	23/04/1974	24/01/1995	25/04/2000	21/02/2013	M.A/M.Sc HPE	JDPE/B.Ed/M.Ed
145	SAIQA BANO	GGHS SHEIKHUL BANDI	SPET	Abbottabad	01/06/1972	31/01/1995	25/04/2000	21/02/2013	BA	JDPE
146	SHABNAM RAHIM	GGHS KHARKI	SPET	MKD	10/03/1974	17/04/1995	25/04/2000	21/02/2013	MA	JDPE/B.Ed
147	TAJ BEGUM	GGHS NAGRAI (P)	SPET	DIR LOWER	01/05/1964	01/08/1995	25/04/2000	21/02/2013	MA/M.Sc HPE	JDPE/B.Ed
148	AMEENA BANO	GGHS BAGH DUSHKHEL	SPET	DIR LOWER	11/10/1971	01/08/1995	25/04/2000	21/02/2013	M.Sc HPE	JDPE/B.Ed/M.Ed
149	SHAHIDA WALI	RITE MANSEHRA	SPET	MANSEHRA	05/06/1972	08/08/1995	25/04/2000	26/02/2013	M.Sc HPE	JDPE/B.Ed/M.Ed
150	SHAMIM BIBI	GGHS PALONAW	SPET	MKD	13/07/1974	14/08/1995	25/04/2000	21/02/2013	BA	JDPE/B.Ed
151	ROSHAN ARA	GGHS SHAWA	SPET	MKD-AGENCY	04/04/1975	28/08/1995	25/04/2000	21/02/2013	MA	JDPE/B.Ed
152	RAZIA	GGHSS THATHI KHURD	SPET	MANSEHRA	01/08/1975	01/09/1995	25/04/2000	26/02/2013	M.Sc HPE	JDPE/B.Ed
153	ZAINAB BIBI	GGHSS GUMBAT	SPET	MARDAN	31/03/1969	09/09/1995	25/04/2000	21/02/2013	MPED	JDPE/B.Ed/M.Ed
154	FAHMIDA BEGUM	GGHS S SAKHAKOT	SPET	MKD	01/03/1973	09/09/1995	25/04/2000	21/02/2013	BA	JDPE
155	TILAWAT	GGHS JAMAL GARHI	SPET	MARDAN	22/05/1976	30/09/1995	25/04/2000	21/02/2013	BA	JDPE
156	DIL KHURSHID	GGHS SHEWAKI	SPET	KOHAT	10/11/1968	14/10/1995	25/04/2000	21/02/2013	MA	JDPE/B.Ed
157	NAGINA BIBI	GGHS RUSTAM KHEL	SPET	MARDAN	01/12/1971	22/10/1995	25/04/2000	21/02/2013	BA	B.ED/SDPE
158	ASMA AFTAB	GGHS HAZAR KHAWANI	SPET	PESHAWAR	06/04/1967	07/12/1995	25/04/2000	21/02/2013	M.Sc HPE	JDPE
159	NABEELA BEGUM	GGCMHS SWABI	SPET	SWABI	10/10/1974	12/12/1995	25/04/2000	21/02/2013	MSc HPE	JDPE/BED

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Seniority	Name of Teacher	Name of School	Desig.	District	Date of Birth	Date of P.T.S. Appointment	Date of Appointment as P.T. (Regular)	Date of Appointment as P.T. (Temporary)	Qualification	Remarks
1	2	4	5	6	7	8	9	10	11	12
597	TOSHEBA SHAI	GGHSS LASSAN NAWAB	SPET	MANSEHRA	22/08/1985	09/05/2009	09/05/2009	17/08/2017	BSc	JDPE
598	ASIA ZEB	GGHS AFZAL ABAD	SPET	MANSEHRA	24/04/1986	11/05/2009	11/05/2009	17/08/2017	MA	JDPE
599	BIBI SOMIA	GGHS SHELIA	SPET	MANSEHRA	01/01/1984	12/05/2009	12/05/2009	17/08/2017	MA M.Sc. HPE	JDPE B.Ed
600	TAMHEED RAHIM	GGPS Ghakhai	SPET	Bajaur	15/01/1983	01/09/2003	05/06/2009	30/05/2018	MA	JDPE
601	BAHERA NAZ	GGMS Pashat	SPET	Bajaur	01/01/1985	05/06/2009	05/06/2009	30/05/2018	MA	JDPE
602	SEWA BIBI	GGHS KARAPA	SPET	BUNER	22/05/1984	30/06/2009	30/06/2009	05/12/2014	BA	JDPE
603	KAUSAR	GGHSS CHEENA	SPET	BUNER	10/01/1986	30/06/2009	30/06/2009	05/12/2014	BA	B.ED/JDPE
604	FAZEELAT	GGHS KUZA NAWAGAI	SPET	BUNER	01/04/1987	30/06/2009	30/06/2009	05/12/2014	MA	JDPE
605	KULSOOM BIBI	GGHSS SHALBANDAI	SPET	BUNER	02/05/1983	01/07/2009	01/07/2009	05/12/2014	MA	JDPE
606	SAEEDA GUL	GGHSS NAWAGAI	SPET	BUNER	02/03/1982	01/08/2009	01/08/2009		BA	JDPE
607	NEELAM SHAAHEEN	GGHSS TOTALAI	SPET	BUNER	15/07/1982	01/09/2009	01/09/2009	05/12/2014	MA	JDPE/B.ED
608	MUSTAMINA	GGHSS PANJAR	SPET	BUNER	10/01/1983	01/09/2009	01/09/2009		BA	JDPE
609	HALEEMA NAWAB	GGHSS HARYAN KOT	SPET	MALAKAND	01/01/1982	04/02/2010	01/01/2010		MA	JDPE
610	RADIFA	GGHS Malkana Nawagai	SPET	Bajaur	01/01/1982	26/04/2007	12/04/2010	30/05/2018	M.Sc HPE	JDPE
611	NEHAYAT SAID	GGMS Nawagai	SPET	Bajaur	01/06/1982	12/04/2010	12/04/2010	30/05/2018	MA	JDPE/B.Ed
612	NIDA NAZ	GGHSS. NO 09 DIN PUR	SPET	DIKHAN	03/05/1984	30/06/2010	30/06/2010	21/08/2017	BA	JDPE
613	NASEEM BEGUM	GGHS AKHAGRAM	SPET	DIR UPPER	09/02/1983	01/04/2005	01/06/2011	15/03/2017	BA	JDPE
614	SHAMIA BIBI	GGMS AGRAM	SPET	DIR UPPER	06/03/1983	01/06/2011	01/06/2011		BA	JDPE
615	NAGINA BIBI	GGMS BABYAWAR	SPET	DIR UPPER	20/04/1987	01/06/2011	01/06/2011		BA	JDPE
616	NAIZA ALAM	GGHS.QAMBER	SPET	SWAT	16/04/1979	18/06/2011	18/06/2011		BA	JDPE
617	SHAHIDA BIBI	GGHS.B.D.KHELA	SPET	SWAT	01/03/1981	18/06/2011	18/06/2011		BA	JDPE
618	KALSOOM SYED	GGHS.BARIKOT	SPET	SWAT	04/03/1984	18/06/2011	18/06/2011		BA	JDPE
619	ZAITOON BANO	GGHS..K.D.KHELA	SPET	SWAT	06/02/1986	18/06/2011	18/06/2011		BA	JDPE
620	ANEELA	GGHS.UIDGRAM	SPET	SWAT	20/02/1986	18/06/2011	18/06/2011		BA	JDPE
621	GHAZALA	GGHS.AHNGORO DHERAI	SPET	SWAT	01/01/1987	18/06/2011	18/06/2011		BA	JDPE
622	SANIA	GGHSS.PANJGRAM	SPET	SWAT	14/01/1988	18/06/2011	18/06/2011		BA	JDPE
623	SALIMA	GGHSS.KABAL	SPET	SWAT	01/02/1984	19/06/2011	19/06/2011		BA	JDPE
624	GULSHAN ARA	GFGHS.KUZ BANDAI	SPET	SWAT	01/04/1980	20/06/2011	20/06/2011		BA	JDPE
625	ZAHIDA	GGHS.CHAM.TALAI	SPET	SWAT	30/04/1984	20/06/2011	20/06/2011		BA	JDPE
626	NOUSHIN AHMAD	GGHS.CHAIL SHAGAI	SPET	SWAT	07/04/1985	20/06/2011	20/06/2011		BA	JDPE
627	SHAHISTA	GGHS.GULIGRAM	SPET	SWAT	12/08/1986	18/06/2011	18/06/2011		M.Sc HPE	JDPE/B.Ed/M.Ed
628	MARYAM	GGHS.JAMBIL	SPET	SWAT	16/05/1977	01/07/2011	14/04/2012		BA	JDPE

Certificates:

- 1 That the Seniority list is widely circulated.
- 2 That Seniority list is undisputed/uncontroversial.
- 3 That there is no litigation pending/involved.

[Signature]
Assistant Director

Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

Attested
[Signature]



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Peshawar, dated the 24th July, 2014.

Annexure C

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NOTIFICATION

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

AMENDMENTS

In the Appendix,-

(i) Serial No. 1 shall be renumbered as 1B and before Serial No. 1B, as so renumbered, the following new entries shall be inserted in respective columns, namely:

1	2	3	4	5
1	Subject Specialist (BPS-17)	i. At least second class Master's Degree or four years BS Degree in the relevant subject; and ii. Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A Education or equivalent qualification from a recognized University.	23 to 35 years	(a) Fifty per cent by promotion, on the basis of seniority-cum-fitness, for the relevant subject from amongst the Secondary School Teachers (BPS-16), with at least five years service as such and having qualification mentioned in column No. 3. Note: If no suitable candidate is available in the relevant subject the post falling in their promotion quota shall be filled by initial

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				recruitment; and (b) fifty percent by initial recruitment.
1A	Director Physical Education (BPS-17)	At least second class Master's Degree in Physical Education from a recognized University.	22-35 years	(a) Fifty percent by promotion, on the basis of seniority-cum-fitness, from amongst Senior Physical Education Teachers (BPS-16), with at least five years service as Senior Physical Education Teacher and Physical Education Teacher and having qualification mentioned in column No. 3: 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

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		<p style="text-align: center;">Attested R</p>		<p>Provided that if no suitable candidate is available from amongst Senior Drawing Masters for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Drawing Masters with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(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:</p> <p>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;</p> <p>(d) four per cent from amongst the Senior Theology Teachers(BPS-16), with at least five years service as Senior Theology Teachers and Theology Teachers and having qualification mentioned in column No.3:</p>
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Provided that if no suitable candidate is available from amongst 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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Primary School Head Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least seven years service as Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No.3:

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:

- I. If no suitable candidate is available in the relevant cadre of the above teachers, the post falling in their promotion quota shall be filled by initial recruitment.
- II. Posts of General SST and SSTs-1 Science and SST-2 Science shall be filled by promotion or initial recruitment, each on need basis separately."

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SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Endst : of even No & date:

1. The Secretary to Government of Khyber Pakhtunkhwa, Establishment and Administration Department Peshawar.
2. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department Peshawar.
3. The Secretary to Government of Khyber Pakhtunkhwa, Law Department Peshawar.
4. The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.
5. The Accountant General Khyber Pakhtunkhwa Peshawar.
6. The Director, Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
7. The Director of Education (FATA) Peshawar.
8. The Director, Curriculum and Teacher Education Khyber Pakhtunkhwa Abbottabad.
9. The Director, (PFTE) 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

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(ZAMIN KHAN MOMAND)
SECTION OFFICER (PRIMARY)



"E" - 20 - 18

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

Dated Peshawar the February 23rd, 2017

NOTIFICATION

NO. SO(S/F)E&SE/4-16/2016/Mst. Shahida Wali/Mansehra: Mst. Shahida Wali, SPET (BS-16) Govt. Girls High School Baidara District Mansehra is hereby transferred and posted as DPE (BS-17) at RITE (Female) Mansehra in her own pay & scale against the vacant post with immediate effect.

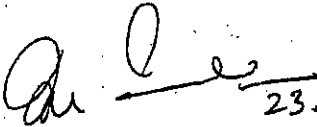
2. No TA/ DA allowed.
3. The above orders will be effective subject to the condition that Mst. Shahida Wali (BS-16) will give an undertaking/ Affidavit on legal/ stamp paper to Secretary E&SE/ Directorate E&SE Peshawar to the effect that she will not claim benefits of graded pay and seniority of the higher pay scale.

SECRETARY

Endst: of even No. & date:

Copy forwarded to the: -

1. Accountant General Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. Director DCTE Abbottabad.
4. District Education Officer (Female) Mansehra.
5. District Accounts Officer Mansehra.
6. In charge EMIS, E&SE Department for uploading at official website.
7. PS to Secretary E&SE Department.
8. Official Concerned.
9. Office order file.


23.02.2017
(LAL SAEED KHATTAK)
SECTION OFFICER (SCHOOLS FEMALE)

Attested
R



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(19)

**DIRECTORATE OF ELEMENTARY & SECONDARY
EDUCATION KHYBER PAKHTUNKHWA,
PESHAWAR**

No. 15/0 /A-25/Appeals SPETs/IPEs.
Dated Peshawar the: 20/10 /2023.

To

The Section Officer (Primary/Female),
Govt of Khyber Pakhtunkhwa, E&SE Department.

Subject: - **APPEAL FOR PROMOTION TO DPE BS-17**

I am directed to refer to your Esteemed Office letter No. SO (P/F)E&SED/2-6/DPC/Shehla Najum/2023 dated 06-10-2023 on the subject cited above and to submit detail report regarding the appeal of Mst. Shahida Wali SPET BPS-16 working against wrong post of (CIPE BPS-19) at RPDC (Female) Mansehra and to state that: -

- i. As per application of the Mst. Concerned requesting for promotion w.e.f 31-05-2019 and stated that she submitted requisite documents etc for promotion but junior have been promoted in 31-05-2019 i.e Serial No of the Promotion Notification who were not B.Ed Degree holders i.e 2, 9, 14, 17, 23, 24 & 29 as well as mentioned that Sr. No. 17, 18, 19, 24 & 29 were also junior, whereas she has not been informed nor promoted as stated by the appellant in her application.
- ii. In this regard it is stated that the Mst concerned has concealed the facts as the reality is much different, the complainant concerned as per her regular appointment is junior as the last female SPET promoted was regular appointment as 11-05-1999 whereas the appellant concerned has regular appointment on 25-04-2000, detail mentioned below: -

Sr#	Name	D/O 1 st Apptl	D/O Regular Apptl as PET
1.	Mst. Dilshad Akhtar	15/09/1988	22/10/1991
2.	Mst. Shahnaz Parveen	15/04/1992	30/08/1996
3.	Mst. Nasim Akbar	01/03/1993	13/05/1997
4.	Mst. Khalida	17/07/1993	13/05/1997
5.	Mst. Kausar Parveen	07/01/1984	11/05/1999
6.	Mst. Farzana Begum	07/11/1992	11/05/1999
7.	Mst. Shadab	06/10/1994	11/05/1999
8.	Mst. Shahida Wali	08/08/1995	25/04/2000
- iii. As far as the appeal regarding promotion of Female IPEs who were not B.Ed Degree holder is concerned, it is stated that the concerned were considered for promotion as IPE BS-17 by the Departmental Promotion Committee (DPC) Chaired by the Honourable Secretary E&SE Department, minutes in this regard available at Office of Section Officer (PE) E&SE Department.
- iv. It is also relevant to mention here with that whenever an office prepares a promotion case, we ask files/documents and ACRs of the teachers on seniority-cum-fitness basis, but it does not mean that the teachers who have been asked by the DEO or Directorate for submission of documents/ACRs will surely be promoted, but the fact is that, promotion always takes place on the basis of seniority-cum-fitness basis and subject to the availability of posts in relevant quota of the cadre.
- v. I am further directed and to state that recently this office has asked all the DEOs Female Khyber Pakhtunkhwa for submission of the documents/ACRs files of Female SPETs BS-16 who have been appointed as PET REGULAR upto 2000, as some posts of IPEs BS-17 are going to be vacated due to the promotion of Female IPEs BS-17 to SIPE BS-18 PSB held on 18-09-2023, in this regard minutes are in process at Establishment Department.
- vi. Hence the appeal of the Mst concerned is not based on facts. Report is submitted please.

Attested
R

or

Assistant Director (Sports)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

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

Legible Copy

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Dated Peshawar the 31.05.2019

NOTIFICATION

No.SO(PE)2-6/DPC Meeting/Promotion from SPET-DPE/17(31/01/17): on the recommendation of the Departmental Promotion Committee (DPC) in its meeting held on 17.04.2019, the competent authority is pleased to promote the following Twenty Nine (29) Female Senior Physical Education Teachers (SPETS) (BS-16) to the post of Instructor Physical Education (IPE) BS-17 on regular basis with immediate effect. Their adjustment posting are mentioned against their names:-

S#	Name of Officer/Present Place of posting	Proposed place of posting	Remarks
1.	Rukhsana Shareen (M. SCHPE /BED) D/o Muhammad Nawaz GGHS Hattar Haripur	GGHS Beer Haripur	Against vacant post
2.	Dilshad Akthar (M. SC HPE) D/o Muhammad Ayub Khan GGHS Mirpur Abbottabad	IPE BS-17, GGHS Kumbhar Dir Lower	She will actualize her promotion in BS-17 and join the post of SIPL BS-18 at GGHS Hajla Gali Abbottabad in her own pay & Scale
3.	Nasreen Suleman (M. SC HPE/B.ED) D/o Muhammad Suleman GHS Mirpur Haripur	GGHSS Darband Mansehra	Against vacant post
4.	Sahna Anjum (M. SS HEP/B.ED) D/o Bahadar Sher GGHS Kernal Sher Khan Swabi	GGHSS Dagal Swabi	Against vacant post
5.	Shahida Jadood (M. SC HPE/B.ED) D/o M. Ilyas Khan Jadoon, GGHS No.2, Abbottabad	IPE BS-17, GGHS Rabat Dir Lower	She will actualize her promotion in BS-17 and join the post of CIPE BS-19 at GGHS Havallan Abbottabad in her own pay & Scale
6.	Ilaj Begum (M. SC HEP/B.ED) D/o Ghulam Ahmad, GGHS JSMALA Swabi	GGHSS Laddi Swabi	Against vacant post
7.	Naheed Begum (M.SC HEP/B.ED) D/o Mansab Khan, GGHS Yar Hussain Swabi	GGHSS Jalsai Swabi	Against vacant post
8.	Tarhat Afroz (M.SC HEP/B.ED) D/o Muhammd Khurshid Ali GGHS Pir PIA Nowshera	GGHSS Manki Sharif Nowshera	Against vacant post
9.	Shahnaz Parveen MPED/D/o Abdul Qadar GHSS Qasmi Mardan	GGHSS Kohl Barmol Mardan	Against vacant post
10.	Alla Rubaba (M.SC HEP/B.ED) D/o Syed Tajdak, Hussain GGHS, MALANA D.I.Khan	IPE BS-17, GGHS Mayar Dir Lower	She will actualize her promotion in BS-17 and join the post of SIPE BS-18 at GGHS Kakki Bannu in her own pay & Scale
11.	Nageena Shaheen (M.SC HEP/B.ED) D/o Muhammad Yaqoob Malik GGHS Dheenda Haripur	GGHSS Zarobi Swabi	Against vacant post
12.	Seema Andaleeb (M.SC HEP/B.ED) D/o Syed Shrafat Husain GGHS Sherkot Khat	IPE BS-17, GGHS Badwan Dir Lower	She will actualize her promotion in BS-17 and join the post of SIPE BS-18 at GGHS Babri Banda Kohat in her own pay & Scale
13.	Zoufshan (M.SC HEP/B.ED) D/o Muzafar Khan, GGHS SIRIKOT Haripur	GHSS Maki Swabi	Against vacant post
14.	Nasim Akbar (M.SC HEP/B.ED) D/o Mian Akbar GGHS Chakdara Dir Lower	GGHSS Shawa Dir Lower	Against vacant post
15.	Mobeen Akhtar (M.SC HEP/B.ED) D/o Taj Muhamamd GGHS Baldher Haripur	GGHSS Tatti Khurd Mansehra	Against vacant post
16.	Nargis (M.SC HEP/B.ED) D/o Sultan Muhammad, GGHS Makeri Bala Swabi	GGHSS Pabani Swabi	Against vacant post
17.	Khalida (M.SC HEP/B.ED) D/o Ajbhar Khan, GGHS GANORI DIR Upper	GGHSS Barawal Dir Upper	Against vacant post
18.	Safina Yasmeen (M.SC HEP/B.ED) D/o Muhammad Sattar, GGCMHS No.1 Dikhan	GGHSS Mandoori Nowshera	Against vacant post
19.	Shehnaz Begum (M.SC HEP/B.ED) D/o Ameer Ullah GGCMHS Tehkal Bala Peshawar	Notional promotion	Her promotion will be effective form the date of DPC meeting held on 17.04.2019 on notional basis in

Attested

20	AMAR BIBI (M. SC HPE/B.ED) D/O SHER ABDAS KHAN, GGHS KOTKA ZABAT KHAN BANNU	IPE BS-17, GGHS Rani Dir Lower	She will actualize her promotion in BS-17 and join the post of SIPE BS-18 at GGHS No. 2 Bannu City in her own pay & scale
21	GUL FERAZA (M. SC HPE/B.ED) D/O MUHAMMAD FAZAL, GGHS BALAKOT MANSEHRA 67	GGHSS Balakot Mansehra 98	Against vacant post
22	RIZWANA KANWAL (M. SC HPE/B.ED) D/O UMAR DARAZ, GGHS DRABAND KALAN D. I KHAN 75	GGHSS Misri Banda Hassan Khel Nowshera	Against vacant post
23	KAUSAR PARVEEN (M. SC HPE) D/O FAZAL ILLAHI, GGHS SHAHPUR SHANGLA 65	GGHSS Lilowani Shangla 99	Against vacant post
24	FARZANA BEGUM (M. SC HPE) D/O BAKHTI RAWAN KHAN GGHS ZIARAT TALASH DIR LOWER 74	IPE BS-17, GGHS Sado Dir Lower 99	She will actualize her promotion in BS-17 and join the post of SIPE BS-18 at GGHS Ziarat Talash Dir Lower in her own pay & scale
25	ZU'BADA KHATOON (M. SC HPE/B.ED) D/O ISRAR KHAN, GGHS PIR WAL, KHEL F.R. KOHAT 69	GGHSS Badar Banda Mardan 99	Against vacant post
26	WAJIDA SHAISTA (M. SC HPE/B.ED) D/O HIDAYAT ULLAH KHAN, GGHS NAHAQI GUL ABAD CHARSADDA 67	GGHSS Koper Mardan 99	She will actualize her promotion in BS-17 and join the post of SIPE BS-18 at GGHS Harichand, Charsadda in her own pay and scale.
27	SARWAT JEHAN (MPE/B.ED) D/O MUHAMMAD NAEEM GGHS KHAIRABAD NOWSHERA 74	GGHSS Nizampur Nowshera 99	Against vacant post
28	ABIDA PARVEEN (M. SC HPE/B.ED) D/O ABDUL WAHID, GGHS KANDARO MALAKAND 76	GGHSS Dheri Adina Malakand 99	Against vacant post
29	ASIFA SHADAB (M. SC HPE) D/O AHMAD ALI SHAH, GGHS BEHZADI CHAKAR KOT KOHAT 73	GGHSS Shakardara Kohat 99	Against vacant post

2. On their promotion, the Instructor Physical Education (IPE) concerned will be on probation for a period of one year extendable for another one year as specified in Rule-15 of Khyber Pakhtunkhwa Civil Servant (Appointment, Promotion and transfer) Rules, 1989, except at S.No.19. However, Serial No. 2, 9, 14, 23, 24 & 29 will acquire the qualification of Bachelor of Education (B.Ed) degree from a recognized university within 3 years from the date of her promotion, failing which their promotion shall be terminated without notice irrespective of any provision of the rules for the time being enforce.

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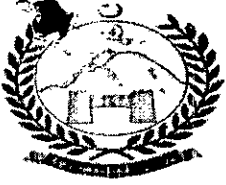
SECRETARY

Endst. No. & date as above.

Copy forwarded to:

1. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. The Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department.
3. The Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department.
4. PSO to Chief Secretary to Govt. of Khyber Pakhtunkhwa.
5. PSO to Additional Chief Secretary FAIA.
6. The Director (E&SE) Khyber Pakhtunkhwa Peshawar.
7. The Director ESRU, Khyber Pakhtunkhwa.
8. The Director Education (Newly Merged Districts), Warsak Road Peshawar.

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**DIRECTORATE ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA, PESHAWAR.**

AUTHORITY LETTER

I, Dr. Samina Altaf, Director (E&SE) Khyber Pakhtunkhwa Peshawar do hereby authorized Mr. Muhammad Rizwan, Assistant Director Litigation-II of this Directorate for submission of Joint Parawise Comments in **Service Appeal No. 1000/2023 case titled Shahida Wali, SPET Mansehra Vs Government of Khyber Pakhtunkhwa & others** fixed for hearing on 24-01-2024, hence, an authority letter is hereby issued in favor of the above-named officer.


(SAMINA ALTAF)
DIRECTOR

E&SE Department Khyber
Pakhtunkhwa, Peshawar.