

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.

Appeal no...6381/ of 2017.

Samina Bibi

VERSUS

Director Education and others

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SCANNED  
KPST  
PESHAWAR

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Your humble Appellant

Samina Bibi

Dated; 27-05-2017.

Anwar Adv

Mohammad Anwar Awan  
Advocate Supreme Court.

**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.**

Appeal no..... of 2017.

Samina Bibi Wife of Muhammad Rafique GGHS No.1 Tank.

**VERSUS**

1. Director Elementary and Secondary Education Deptt: Peshawar.
2. District Education officer (Female) Elementary and Secondary Education Deptt: Tank.
3. Sub-District Education Officer (Female) Tank.
4. Account Officer Kechary Road Tank.
5. Government of KPK through secretary Elementary and Secondary Education Deptt: Peshawar.
6. Ghazala Gulfam SST GGHS Aslam Khan Korona District Tank.

**APPEAL UNDER SECTION 4 OF KPK SERVICE TRIBUNAL  
ACT AGAINST ILLEGAL AND MALAFIDE NOTIFICATION  
DAATED; 02-02-2017 REGARDING REVERSION ON THE  
BACK OF APPELLANT.**

That the brief facts of the case are as under:

1. The Appellant was serving as Senior Qaria in Government Girls High School, GaraShahbaz of District Tank.
2. That in 2016 one post of SST (B-16) become vacant. The basic qualification for promotion as SST is Second Class Bachelor Degree with Master in Education or Bachelor in Education. Copy of Rules is Annexure A.
3. That for the purpose of filling the one vacant post, working paper for the meeting of departmental promotion committee was prepared by the respondent No.03 and Appellant was shown a single senior and eligible candidate for the said post. Copy of working paper is Annexure B.

4. That it is matter of record that Mrs. Ghazal Ghulfam, Senior Qaria GGHS No.1 Tank was shown ineligible for promotion to the post of SST (BPS-16) in the working paper due to incompleteness of B.Ed. Copy of Academic Qualifications of respondent No.6 is Annexure C.
5. That finally, consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification Dated: 24-07-2014, the Appellant was promoted from the post of Senior Qaria to SST (BPS-16) through promotion notification 6398-6404/File No.2/Promotion SST-16 Peshawar Dated 27-05-2016. Later on, the Appellant was adjusted by respondent no.03 through her adjustment order passed in June 2016 at GGHS Gul Imam against vacant post and Appellant also assumes the charge on 17-06-2016. She was further transferred to GGHS GaraShahbaz SST(G) and also assume the charge on 21-07-2016. Copies of the Promotion Notification Dated: 27-05-2016, Adjustment Order June 2016, Charge Assumption Report Dated: 17-06-2016, transfer order and Charge Report are Annexure D, E, F, G & H.
6. That Appellant was performing her duties as Secondary School Teacher (BPS-16) at GGHS Gara Shabaz quite up to the satisfaction of her superior when suddenly, the Appellant was informed by the respondent No.03 that Appellant has been reverted to her earlier post and her promotion Order has been withdrawn by Notification dated: 02-02-2017 and one an ineligible and junior candidate Mrs. Ghazalm Ghulfam Senior Qaria GGHS No.01 Tank has been promoted in place of Appellant as SST (BPS-16). The respondent no.03 issued her adjustment Order No.791-97 Dated: 13-02-2017. Copies

of reversion notification dated: 02-02-2017 and adjustment Order dated: 13-02-2017 are Annexure I & J.

7. That heaving left with no other efficacious or alternative remedy the Appellant humbly approaches Hon'ble Court for redressal of her grievance on the following amongst other grounds.

GROUND:

- Answer*
- i. That the impugn seniority list through which the Appellant illegally and malafidely been shown junior to Respondent No. 05 is patently illegal, void ab initio, unwarranted and legally not sustainable in the eyes of law and that too has been prepared at the back of Appellant, infringing her valuable vested rights, thus liable to be set aside on this score alone.
  - ii. That the impugn seniority list is non EST and ineffective and ineffective upon the accrued rights of the Appellant because Respondent No. 05 was an ineligible and junior candidate as reflected in the working paper of the Department, thus the impugn seniority list is liable to be set at naught.
  - iii. That Respondent No. 05 has illegally and malafidely been shown as senior to the Appellant because she completed Bachelor of Education (B.Ed) on 07-10-2016 while the Appellant completed Bachelor on 26-12-2013, so legally the candidate who fulfilled the requisite criteria

for the post of SST (BPS-16) earlier in time will automatically rank senior from her partner while in the instant case Respondent No. 05 has been given undue favor being blue-eyed child the department, thus bulldozing the valuable and fundamental rights of the Appellant, thus entire controversy needs to be graciously considered.

- iv. That case of Appellant is clear cut discrimination case on part of Departmental Authorities, because the impugn seniority list has been passed by keeping herein dark and that too in a very arbitrary manner.
- v. That while passing the impugn seniority list, the legal and factual aspects of the controversy have not been appreciated in its true perceptive by the Departmental Authority, nor they provided any opportunity of hearing the Appellant while all the impugn notification was issued without conducting any inquiry. It is also astonishing that the order dated: 27.05.2016 regarding promotion of Appellant was not challenged by the respondent no; 05 through any application or Appeal.
- vi. That the impugn seniority list is against law, Facts of the case and material available on record thus liable to be set aside.

In view of the above, It is, therefore, most respectfully prayed that on acceptance this appeal this honorable court may pleased to declare that the notification No.878-80 dated; 02-02-2017 and adjustment order dated; 13-02-2017 being void, illegal, without lawful authority and of no legal effect

and appellants may pleased be reinstated at the post of SST (B-16) with all back benefits.

YOUR HUMBLE APPELLANT

*Samina Bibi*  
Samina Bibi  
Through Counsel

Dated; 27-05-2017.

*Anwar Adv*  
Mohammad Anwar Awan  
Advocate Supreme Court

AFFIDAVIT

**Samina Bibi** do hereby solemnly affirm and declare on OATH that the contents of the same are true and correct to the best of my knowledge and belief and that nothing has been concealed from this honorable court.

**Deponent.**

*Samina Bibi*

سندھ میگزین کے علاوہ بچوں اور خواندین کا میگزین 10 روپے میں حاصل کریں

سر سید نیوز اسٹال نزد سول ہسپتال

GOVERNMENT OF THE KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.



NOTIFICATION

Peshawar, dated the November 13, 2012.

No. SORPEN/SSAC/Meeting/2012/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 and in supersession of all Notifications issued in this behalf, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department hereby lays down the method of recruitment, qualification and other conditions specified in the Appendix to this Notification which shall be applicable to all the posts specified in Column No. 2 of the said Appendix and the schedule therewith.

SECRETARY TO GOVERNMENT OF THE KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

Encls. No. & Title as above.

Copy to be sent to:-

1. The Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department.
2. The Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department.
3. The Secretary to Govt. of Khyber Pakhtunkhwa, Law Department.
4. The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.
5. The Accountant General, Khyber Pakhtunkhwa Peshawar.
6. The Director (E&SE) Khyber Pakhtunkhwa Peshawar.
7. The Director Education (FATA), Peshawar.
8. The Director (E&SE) KPK.

ہر مالیت کے پرائز بانڈ کی بڑی سائز کی لسٹ ہمارے پاس دستیاب ہوتی ہے  
نیز ہر مالیت کے پرائز بانڈ کا مکمل 6 سالوں کا رزلٹ نقد اور کرائے پر دستیاب ہے  
سعید نیوز اسٹال نزد سول ہسپتال ڈیرہ اسماعیل خان 0333-996-8040

8. The Director Curriculum & Teachers Education Abbottabad
9. The Director (PITE) Khyber Pakhtunkhwa Peshawar.
10. The Director ESRU, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar
11. The Deputy Director Database (EMIS) E&SE Department
12. All District Coordination Officers in Khyber Pakhtunkhwa.
13. All Executive District Officers Elementary & Secondary Education in Khyber Pakhtunkhwa.
14. All District Accounts Officers in Khyber Pakhtunkhwa / Agency Accounts Officers FATA.
15. All Agency Education Officers FATA.
16. P.S to Governor, Khyber Pakhtunkhwa.
17. P.S to Chief Minister, Khyber Pakhtunkhwa.
18. P.S to Chief Secretary, Khyber Pakhtunkhwa.
19. PS to Minister E&SE Khyber Pakhtunkhwa Peshawar
20. PS to Secretary E&SE Department.
21. Master File.

KPK

درا

Section Officer (Primary)

ہرمالیت کے پرائز بانڈ کی بڑی سائز کی لسٹ ہمارے پاس دستیاب ہوتی ہے  
 نیز ہرمالیت کے پرائز بانڈ کا مکمل 6 سالوں کا رزلٹ نقد اور کرائے پر دستیاب ہے  
 سعید نیوز اسٹال نزد سول ہسپتال ڈیرہ اسماعیل خان 0333.996.8040



7-

3  
2

APPENDIX

S.No.	Nomenclature of the post	Minimum qualification and experience for initial appointment or by transfer.	Age limit.	Method of recruitment.
1.	2.	3.	4.	5.
1.	Secondary School Teacher (BPS-16).	(i) Second class Bachelor's Degree with two subjects as Chemistry, Botany, Zoology, Physics, Mathematics, Statistics Humanities and other equivalent groups from a recognized University; or  (ii) M.A in Education or Bachelor's Degree in Education, from a recognized University.	18 to 35 years.	(a) Fifty percent by promotion on the basis of seniority-cum-fitness, in the following manner:  (i) forty per cent from amongst the Certified Teachers (General), Certified Teachers (Agriculture), Certified Teachers (Industrial Arts) and Certified Teachers (Home Economics) with at least five years service as such and having qualification mentioned in column No. 3;  (ii) four per cent from amongst the Drawing Masters with at least five years service as such and having qualification mentioned in column No.3;  (iii) four per cent from amongst the Physical Education Teachers with at least five years service as such and having qualification mentioned in column No. 3.

KPK. *Handwritten signature*  
 رقم الترتیب با درجہ  
 مہلکی صدر  
 آغا  
 0305988957

(iv) one per cent from amongst the Instructional Material Specialists, with at least five years service as such and having qualification mentioned in column No. 3; and

(v) one per cent from amongst the Arabic Teachers with at least five years service as such and having qualification mentioned in Column No. 3; and

(b) fifty per cent by initial recruitment.

By promotion, on the basis of seniority-cum-fitness, from amongst Arabic Teachers, with at least five years service as such and having qualification as prescribed for initial recruitment of Arabic Teacher.

By promotion, on the basis of seniority-cum-fitness, from amongst Theology Teachers, with at least five years service as such and having qualification as prescribed for initial recruitment of Theology Teacher.

By promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers (General), with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (General).

Senior Arabic Teacher (SAT) (UPS-16)

Senior Theology Teacher (STT) (B-16)

Senior Certified Teacher (SCT) (General) (UPS-16)

*Handwritten notes:*  
Dens  
KPK  
27/7/2014  
22/8/2014

*Handwritten initials:* AR

B-8-

WORKING PAPERS FOR DEPARTMENTAL PROMOTION COMMITTEE FOR THE  
PROMOTION OF S.Qaria / Qaria TO SST (General) B-16

Total No of Vacant SST (General) Posts = 25

Method of Recruitment.	Total Posts	Already promoted	Next to be promoted
25% Initial Recruitment.	06	05	01
75% by Promotion	40% by promotion from SCT/CT	10	09
	20% by promotion from PSHT/SPST/PST	05	05
	4% by promotion from SDM/DM	01	01
	4% by promotion from SAT/AT	01	01
	4% by promotion from STT/TT	01	Nil
	3% by promotion from S.Qaria/Qaria	01	0
<b>Total</b>	<b>25</b>	<b>21</b>	<b>04</b>

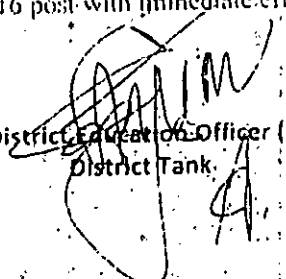
LIST OF S.Qaria / Qaria (F) FOR THE PROMOTION TO SST.

S#	S.L. NO	Name of official & present place of posting	Date of Birth	Date of appointment as regular S.Qaria / Qaria	Qualif:	Whether eligible for promotion	Remarks
1-	2	Mrs. Ghazal Gulfam S.Qaria GGHS No.1, Tank	01/02/1969	03/02/1987	MA	No	Due to B.Ed incomplete
2-	4	Mrs. Samina Bibi S.Qaria GGHS Gara Shahbaz.	01/08/1978	19/09/2007	MA/BEd.	yes	

CERTIFICATES

1- It is certified that all the S.Qaria/Qaria (Female) included in the panel for the promotion to SST General Post.

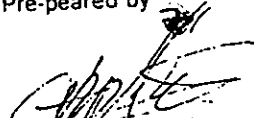
- Hold the posts on regular basis and none of them is holding the post on adhoc /etin charge basis/contract.
- Have completed the required minimum length of qualifying service and qualifications as required for promotion to the post of SST under the rules.
- None of them is on deputation to any organization under the Federal / Provincial / Autonomous / Local Autonomous / International organization.
- Neither any disciplinary/departmental proceedings/anti-corruption/judicial enquiry is pending against them nor has any penalty been imposed upon any one of them during the last five years.
- No one is on long leave/Ex-Pakistan leave.
- Their ACRs, Synopsis are free from adverse remarks.
- They are all alive and serving
- Their appointment orders against S.Qaria / Qaria posts are attached herewith.
- The Seniority list of official / officers is final, undisputed and not subjudice.
- The Departmental Promotion Committee is requested to determine the suitability of the above S.Qaria / Qaria for Promotion to SST(G) B-16 post with immediate effect.

  
District Education Officer (F)  
District Tank.


FINAL GENERAL SENIORITY LIST IN R/O QARIA TEACHER (F) DISTRICT TANK UPTO 23/03/2016.

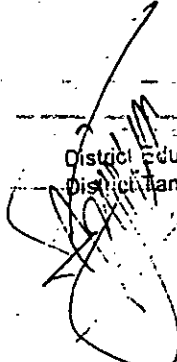
S#	Name of Teacher	Father's Name	Acad/Prof: Qualification	BPS	Date of Birth	Domicile	D/O 1st Entry into Govt: Service	D/O Apptt in the Present Post	Place of Posting	Remarks
1	Shehnaz Akhtar	Aman Ullah	F.A/ Sanad Yafta	15	01/01/1966	Tank	26/10/1986	26/10/1986	GGHS Mullazai	
2	Ghazala Gulfam	Ghulam Sarwar	F.A/ Sanad Yafta	15	01/02/1969	Tank	03/02/1987	03/02/1987	GGHS No. 1 Tank	
3	Shagufta Andaleeb	Aman Ullah	BA,S.Y.	12	05/02/1980	Tank	08/12/2006	08/12/2006	GGHS Ama Khel	
4	Samina Bibi	Dost Muhammad	MA(arb)BEEd,S.Y	15	01/08/1978	Tank	19/09/2007	19/09/2007	GGHS Gara Shahbaz	
5	Samina Bibi	Elahi Bakhsh	MA(arb)BEEd,S.Y	12	16/03/1996	Tank	27/02/2008	27/02/2008	GGHS No.2 Tank	
6	Nussrat Shaheen	Sarwar Jan		12	05/02/1985	Tank	01/01/2013	01/01/2013	GGHS Pai	
7	Zartasha	Muhd: Sultan		12	09/10/1991	Tank	01/01/2013	01/01/2013	GGHS Aslam Khan	
8	Kalsoom Begum	Obaidullah	BA,S.Y.	12	07/04/1986	Tank	01/01/2013	01/01/2013	GGHS Gul Imam	
9	Vacant								GGHS Dabbara	
10	Qamar un Nisa	Naimatullah	MA/S.Y	12	10/01/1985	Tank	02/03/2016	02/03/2016	GGHS M/Akbar	

Pre-peared by

  
Amanullah SiClerk  
O/ODEO(F)Tank.

Cheked by

  
Mst. Nureen Saba ADEO(Estb)  
O/ODEO(F) Tank.

  
District Education Officer (F).  
District Tank

# ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD

## PROVISIONAL RESULT CARD



10

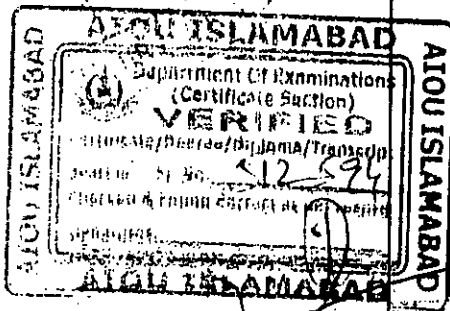
Name: SAJJID PIRI  
 Father's Name: BOSTI MUHAMMAD  
 Address: SHAN HOOK SEELAR HANSOOD MARKET WANA ROAD  
 Tehsil: TANK  
 District: TANK

Roll No. AQ627770  
 Registration No. 04NTK0259  
 Final Semester SPR-2013

has successfully completed BACHELOR OF EDUCATION (B. ED)

The detail of passed courses is as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
AUT-2	0551	ENGLISH (COMPULSORY)	100	54
AUT-2	0518	EDUCATIONAL PSYCHOLOGY & CURRICULUM	100	60
AUT-2	0514	EVALUATION, GUIDANCE & RESEARCH	100	63
AUT-2	0513	SCHOOL ORGANIZATION	100	54
SPR-3	0655	WORKSHOP & TEACHING PRACTICE	100	84
SPR-3	0654	TEACHING OF ISLAMIAT	100	53
SPR-3	0517	TEACHING OF PAKISTAN STUDIES	100	54
SPR-3	0652	ISLAM, PAKISTAN AND MODERN WORLD	100	59
SPR-13	0510	PERSPECTIVES OF EDUCATION	100	67



Assistant Controller of Examinations  
 Verification Section  
 Allama Iqbal Open University

Total Marks / Obtained

900 / 548  
 61.0%

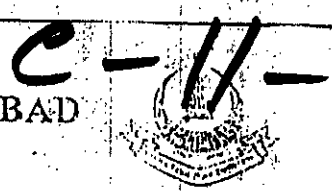
Result Declared on DECEMBER 26, 2013

Date of issue JANUARY 07, 2014

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.

*Signature*  
**Controller of Examinations**

17



ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD

PROVISIONAL RESULT CARD

Serial No. A-21865

Name: HAJI GHULAM SARWAR KHAN  
Father's Name: HAJI GHULAM SARWAR KHAN  
Address: HAJI GHULAM SARWAR KHAN

Roll No. AZ675738  
Registration No. 05NFK0107  
Final Semester SPRING 2015

Tehsil TANK  
District TANK  
has successfully completed

BACHELOR OF EDUCATION (B.ED)

The detail of passed courses is as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
AUTUMN 2014	512	PERSPECTIVES OF EDUCATION	100	63
AUTUMN 2014	514	EVALUATION, GUIDANCE AND RESEARCH	100	65
AUTUMN 2014	518	EDUCATIONAL PSYCHOLOGY	100	70
AUTUMN 2014	651	ENGLISH	100	54
AUTUMN 2014	652	ISLAM, PAKISTAN AND MODERN WORLD	100	64
SPRING 2015	517	TEACHING OF PAKISTAN STUDIES	100	54
SPRING 2015	654	TEACHING OF ISLAMIAT	100	74
SPRING 2015	655	WORKSHOP AND TEACHING PRACTICE	100	94
AUTUMN 2014	513	SCHOOL ORGANIZATION	100	63

Credits: 6

Total Marks / Obtained

900 / 601

Result Declared on January 14, 2016

Percentage / Grade

67 / B

Date of issue: October 07, 2016

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.

Signature  
Controller of Examinations

Result Intimation Card  
Degree Level: B.ED (ARTS)

- 12 -

Name: GHAZALA GULFAM  
 Father Name: HAJI GHULAM SARWAR  
 Address: C/O ABDUL AZIZ OIL MERCHANT SABIR BAZAR  
 Tehsil: TANK District: TANK

Roll No:	AZ675738
Reg No:	05NTK0107

Code	Total Assignment Marks	Examination Marks	Conflated Marks	Grade	Result
Autumn: 2014					
0512	165	54	63	B	PASS
0513		50			FAIL
0514	160	58	65	B	PASS
0518	191	59	70	A	PASS
0651	175	40	54	C	PASS
0652	185	52	64	B	PASS
Spring: 2015					
0517	268	48	54	C	PASS
0654	377	65	74	A	PASS
0655			94	A+	PASS

\* AREAP=Again Re-appear, \* REAP=Re-appear, \* ABST=Absent



(PrintResultHistory.asp?rno=AZ675738&  
LevelName=PHD)



(<https://www.facebook.com/aiou.main?ref=hl>)



(<https://twitter.com/OfficialAIUO>)



Helpline: 051-111-112-468

(For use in Police Department only).

الزوج من النسبة العربية الإسلامية (تعليم) (اسم) (تاريخ)  
 Heirs,  
 Signature

1. Passed B.S.c Exam in 1986 (A) from B.I.S.E Peshawar
2. Roll No. 34085 Marks obtained 430/850 Result Declared
3. on 17-8-1986.

Verification Roll No. dated received back

- 2) Passed F.A Examination in 1995 (A) from B.I.S.E  
 Rawalpindi Roll No. 69223 Marks obtained 539/1100  
 Result Declared on 15 Oct. 1995

Left thumb impression. *Sajida Begum*

- 3) Passed B.A Examination session (2008) (A) from  
 Excise Criminal University Dikhan Roll No. 9163

Qualification	Marks obtained	Result	Qualifications	Date
English	314/550	Result	First Arts	10/9/2008
Pashtu			B. I. or B. A.	

- 3) Urdu Passed M.A Examination Session 2013 (A)  
 Excise Criminal University Dikhan Roll No. 3127

Qualification	Marks obtained	Result	Other qualifications
PLH-drawing	660/1100	Result	Training School Final Examination

Finger print Other qualifications

Drill instructing

- 9) Passed B.Ed Examination Session 2015 (A) from  
 AIOU Islamabad Roll No. AZ 675738  
 Reserve Judge Mark obtained 160/900 grade B Result Declaration

Court duties

5) شهادة الفراعين في اللغة العربية  
 ان اللغتين مع الجوز دار العلم  
 H. D. - Line to be drawn under the qualification possessed.  
 1924 = 100  
 100 = 100





Directorate of Elementary and Secondary Education  
Khyber Pakhtunkhwa

PH No. 091-9210389, 9210938,  
9210437, 9210957, 9210468.  
Fax 091-9210936, 9860-33857  
E-mail rafiq\_kk851@yahoo.com

**Notification**

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No SO(PE)/45/SSRC/Meeting/2013/Teaching Cadre dated 24 July 2014, the following SGTs/CTs, SDMs/DMs, SATs/ATs, SSTs/TTs, Senior Qarids/Qarids, PSHTs/SPSTs/PSTs are hereby promoted to the post of SST (Bio/Chem), SST (Phy/Maths), SST (General) noted against each BPS-16 (Rs. 12910-10357-13960) plus usual allowances as admissible under the rules and regulations in force under the existing policy of the Provincial Government on the terms and conditions of service with immediate effect and further they will be posted by the District Education Officer concerned.

**A. SST (Maths/Physics)**

**1. PROMOTION OF Sr. CT/CTO TO SST (Maths/Physics) BPS-16**

Total No. of vacant post of SSTs (Maths/Physics)	07
25% share initial recruitment	02
75% share for Promotion	05
40% Share of promotion of Sr. CT/CT	01
Posts available for promotion	01
Promoted through this order	01

S.No	S.L No	Name of Official & Present Place of Posting	Date of Birth	Date of Appoint as Regular CT	Qualification	Remarks
1	10	Naseem Naz, GOHS, Gul Imam	01-07-1977	12-12-2002	BSc/B.Ed	Services placed at the disposal of DEO (F) Tank for further posting against SST (Maths/Physics) post.

**B. SST (General)**

**2. PROMOTION OF Sr. CT/CT TO SST (General) BPS-16**

Total No. of vacant post of SSTs (General)	01
25% share initial recruitment	0
75% share for Promotion	01
40% Share of promotion of Sr. CT/CT	01
Posts available for promotion	01
Promoted through this order	01

S.No	S.L No	Name of Official & Present Place of Posting	Date of Birth	Date of Appoint as Regular CT	Qualification	Remarks
1	01	Kalsoom Akhbar, GOHS No. 1 Tank	28-12-1957	17-09-1984	MA/B.Ed	Services placed at the disposal of DEO (F) Tank for further posting against SST (General) post.

**3. PROMOTION OF Sr. TT/TT TO SST (General) BPS-16**

Total No. of vacant Posts SST (General)	03
25% share initial recruitment	0
75% share for Promotion	03
04 % Share of promotion of Sr. TT/TT	01
Posts available for promotion	01
Promoted through this order	01

S.No	S.L	Name of Official &	Date of	Date of	Qualificati	Remarks
------	-----	--------------------	---------	---------	-------------	---------

Revised

3

SSTs (F) Tank 12

No	Present Place of Posting	Birth	Appoint: as Regular TT	on	
11	Sumera GGHS No.1 Tank	29-09-1976	20-12-2008	MA/B.Ed	Services placed at the disposal of DEO (F) Tank for further posting against SST (General) post.

4. PROMOTION OF S.Qari/Qari TO SST (General) BPS-16	
Total No. of vacant Posts SST (General)	
25% share initial recruitment	03
75% share for Promotion.	0
03 % Share of promotion of S.Qari/Qari	03
Posts available for promotion	01
Proposed for Promotion	01
Recommended for promotion	01

S.No	S.L No	Name of Official & Present Place of Posting	Date of Birth.	Date of Appoint: as Regular Qari	Qualificati on	Remarks
1	1	Samina Bibi GGHS Gura Shahbaz	01-08-1978	19-09-2007	MA/B.Ed	Services placed at the disposal of DEO (F) Tank for further posting against SST (General) post.

**Terms and conditions:-**

- 1 They would be on probation for a period of one year extendable for another one year.
- 2 They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 3 Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be preceded 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 his duty.
- 7 They will give an under taking to be recorded in their service book to the effect that if any over payment is made to him in light this order will be recovered and if he/she is wrongly promoted he/she will be reversed.
- 8 They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 9 Before handing over charge once again their document may be checked if they have not the required relevant qualifications as per rules, they may not be handed over charge of the post.

6398-6404

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

Endst: No. / File No.2/Promotion SST B-16: Dated Peshawar the 27/05/2016.

Copy forwarded for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. District Education Officer concerned
3. District Accounts Officer concerned
4. Official Concerned.
5. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
6. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
7. M/File

Dy Director (Estab)  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

(4)

E-15

OFFICE OF THE  
DISTRICT EDUCATION OFFICER (E) TANK

ADJUSTMENT ORDER:

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar Notification Enclst: No. 6398-556-404/E.No. 2/Promotion SST B-16 dated Peshawar the 27/05/2016, following SST (General) / SST ( Physics/Math. ) are hereby adjusted against the school noted against each in BPS-16 (12910-1035-43910) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the Terms & Conditions given below with immediate effect.

SST (General)

S.No	Name of Official	Father's Name	Previous place of posting	Present Place of Posting	Remarks
1-	Mrs, Samina Bibi	Dost Muhammad	GGHS Gara Shahbaz	GGHS Gul Imam	Against Vacant post

Terms and Conditions:

- 1- They would be on probation for a period of 01 year extendable for another 01 year
- 2- They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 3- Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the 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 her duty.
- 7- They will give an undertaking to be recorded in their Service Books to the effect that if any over payment is made to her in light of this order will be recovered and if she is wrongly promoted, she will reversed.
- 8- They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 9- Before handing over charge, once again their documents may be checked if they have not the required relevant qualification as per rules, they may not be handed over charge of the post.
- 10- Pay will not be released until they submit the verified B.Ed Degree.

(SHEERA ANJUM)  
District Education Officer (E)  
District Tank

June 2016

(5)

Endst: No. 4112-18 /SSF/Promotion Dated Tank the 17/06/2016.

Copy to the:

- 1- Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar w/r to his No. & dated cited above.
- 2- Deputy Director (Estab) Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- 3- District Accounts Officer, Tank
- 4- ADEO (Estab) Local Office.
- 5- Principal / Headmistress concerned.
- 6- Officer concerned.
- 7- Office File.

  
District Education Officer (I)  
District Tank

Page 2 of 2

⑦

F-16

# چارچ رپورٹ

میں سہمی کھینچ لی لی نے سہمی بدر شاہین AM  
Enlist No: 4112-18/SST/Promotion  
سے جو کہ آج مورخہ 17-06-2016 قبل بعد از دوپہر بموجب حکم نمبری  
نمبر 17-06-2016 آمدہ از دفتر گورنمنٹ ایلی اہائی سکول ہٹو ٹانک  
تبدیل ہونے کا BPS-16 (S.S.T) پوسٹ کا چارج سنبھال لیا ہے۔  
مقام گورنمنٹ ایلی اہائی سکول ہٹو ٹانک  
مورخہ 17-06-2016

Sarmina Bibi  
چارچ گیر ہندہ  
(59766)

Principal  
GGHS Gul Imam  
District Tank

(8)


## تفصیل اشیاء بقایا (بذمہ چارج دہندہ)

نمبر شمار	نام اشیاء	تعداد اشیاء	کل قیمت	بوسیدہ	گمشدہ	کیفیت

موزخ  
چارج گیر ہندہ  
موزخ

مقام گورنمنٹ ہائی اسکول  
چارج دہندہ  
موزخ

جناب عالی: چارج رپورٹ 3/4/5 پرت بخدمت عالیہ برائے ضروری کارروائی ارسال ہیں

  
Principal  
GGHS Gul Inam  
District Tank  
ہیڈ ماسٹر گورنمنٹ ہائی اسکول

ہر قسم کے نام و حساب میں شان کھلڑ مسعود مارکیٹ ٹانک



6

H-17-

OFFICE OF THE  
DISTRICT EDUCATION OFFICER (F) TANK

ADJUSTMENT / TRANSFER:

Following Officers/Officials are hereby adjusted / Transferred on Administrative ground in the best interest of public service with immediate effect.

S.#	Name & Designation	From	To	Remarks
1-	Mrs. Raheela Nureen SST(G)	GGHS G/Shabaz	GGHS No.1. Tank	Against vacant newly created post
2-	Mrs, Samina Bibi SST(G)	GGHS Gul Imam	GGHS Gara Shabaz	Against V/No.1.
3-	Mrs, Naseem Naz SST(M)	GGHS Gara Shabaz	GGHS Gul Imam	Against Vacant Post
4-	Mrs, Rifat Nagin SST(Sc:Bio)	GGHS No.2. Tank	GGHS Gara Shahbaz	Against Vacant post
5-	Mrs, Nazila Bibi SST(Sc:Bio)	GGHS Gul Imam	GGHS No.2. Tank	A.V.No.4
6-	Mrs, Sawera Sanam CT	GGMS Ali Khel	GGMS Qutab Collony...	A.V Newly Created Post
7-	Mrs, Guishan Bibi CT	GGMS Gomal Bazar	GGMS Gara Baloch	A.V. Newly created post

Note:-

- 1- Charge report should be sent to all concerned.
- 2- No TA/DA is allowed.

Endst No. 4500-4506 dated Tank the 20 / 07 / 2016

District Education officer.  
(Female) Tank.

Copy to the :-

- 1- District Accounts Officer Tank.
- 2- ADEO(Estab) Local office.
- 3- Accountant local office.
- 4- Principal Head Mistress Concerned.
- 5- DMO IMU Tank.
- 6- Official Concerned.
- 7- Office file.
- 8- Director BLSB Peshawar.

District Education Officer,  
(Female) Tank

# چارچر پورٹ

میں مہسی کلینہ جی جی S.S.T نے مہسی چارچر کونٹر

سے جو کہ آج مورخہ  $21 \frac{7}{2076}$  قبل بعد از دوپہر بموجب حکم نمبری 2076 کے سرکاری نوٹوں کے لئے

(رٹ نامے) ضمیمہ نمبر 2076 آئندہ از دفتر Endot: No. 4500-4506

تبدیل ہوا ہے۔ S.S.T (کے) پوسٹ کا چارج منجالی لیا ہے۔

مقام۔ گڑھ شہار گورنمنٹ ڈل اہائی سکول گڑھ شہار

مورخہ۔ 21-7-2076

Sumina Bibi

چارچر گیر ہندہ

Head Mistress  
G.S.S. School  
District Taluk

چارچر گیر ہندہ



تفصیل اشیاء بقایا (بذمہ چارج و ہندہ)

نمبر شمار	نام اشیاء	تعداد اشیاء	کل قیمت	بوسیدہ	گمشدہ	کیفیت

مقام گورنمنٹ ڈسٹرکٹ اسکول گرا شہباز

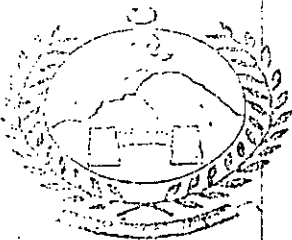
مورخہ  
چارج گیر ہندہ  
مورخہ

چارج دہندہ  
نمبر

جناب عالی: چارج رپورٹ 3/4/5 پرت بخدمت عالیہ برائے ضروری کارروائی ارسال ہیں

Head Mistress  
GGHS Gara Shuhbaz  
ہیڈ ماسٹرس گورنمنٹ ڈسٹرکٹ اسکول

ہر قسم کے نارم دستیاب میں شان بکسیر اسسوز مارکیٹ ٹانک



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

PH No. 091-9210389, 9210938,  
9210437, 9210957, 9210468  
Fax 091-9210936, 0800-33857  
E-mail rafiq\_kk851@yahoo.com

**Notification**

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification NoSO(PE)/4-5/SSRC/Meeting/2013/Teaching Cadre dated 24<sup>th</sup> July, 2014, the following SCTs/CTs, SDMs/DMs, SATs/ATs, STTs/TTs, Senior Qarias/Qarias, PSHTs/SPSTs/PSTs are hereby promoted to the post of SST (Bio-Chem), SST (Phy-Maths), SST (General) noted against each BPS-16 (Rs. 15880-1280-54280) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and further they will be posted by the District Education Officer concerned.

**A. SST (General)**

**1- PROMOTION OF Qari/SQaria To SST (General) BPS-16.**

Total No. of SST General (F) vacant posts	03
25 % share initial recruitment	00
75 % share for promotion	03
40 % share of promotion of Qaria/SQaria	01
Posts available for promotion	01
Recommended for promotion	01

S.No	S.L. No	Name of Official & Present Place of Posting	Date of Birth	Date of Appoint: as Regular SQarora	Qualificatio	Remarks
01	02	Ghazala Guljam GGHS No.1 Tank	01-02-1969	03-02-1987	B.A./B.Ed	Services placed at the disposal of DEO(F) Tank for further posting against SST (General) post.
02	04	Samina Bibi GGHS Gara Shahbaz	01-08-1978	19-09-2007	B.A./B.Ed	The promotion order is withdrawn being junior and further her services are placed at the disposal of DEO(F) Tank for further posting against a vacant post of Qaria.

**Terms and conditions:-**

1. She would be on probation for a period of one year extendable for another one year.
2. She will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. Her services can be terminated at any time, in case her performance is found unsatisfactory during probationary period. In case of misconduct, she shall be proceeded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Her Inter-Ser seniority on lower post will remain intact.
6. No TADA is allowed for joining her duty.
7. She will give an under taking to be recorded in her service book to the effect that if any over payment is made to her in light this order will be recovered and if he/she is wrongly promoted he/She will be reversed.
8. Before handing over charge once again her document may be checked if she has not the required educational qualifications as per rules, she may not be handed over charge of the post.

(Muhammad Rafiq Khattak)

Director  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar.

Order No. 878-80 / File No.2/A-17/Promotion SST B-16:/Tank  
Dated Peshawar the 2/1/2017

Copy forwarded for information and necessary action to the:-

1. District Education Officer (F) Tank
2. District Accounts Officer Tank
3. Official Concerned.
4. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
5. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
6. M/File

Dy. Director Estab: (F) (e)  
Elementary and Secondary Education

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OFFICE OF THE  
DISTRICT EDUCATION OFFICER (F) TANK

ADJUSTMENT ORDER:

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar Notification Endst: No. 3598-3604/F.No. 2/Promotion SST B-16 dated 28/10/201 & in pursuance to Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar Notification Endst: No. 878-80 F. No. 2/A-17/Promotion SST B-16/Tank dated 22/02/2017, following SST (G) are hereby adjusted against the school noted against each in BPS-16 (15880-1280-54280) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the Terms & Conditions given below while Mrs. Samina Bibi SST GGHS Gara Shahbaz is hereby reverted to the post of Qaria as she is low in seniority list in the light of said notification and adjusted to the school noted against with immediate effect.

S.#	Name of Official	Previous place of posting	Place of Posting	Remarks
1	Mrs. Ghazala Gullam SST	GGHS No. 1 Tank	GGHS Aslam Khan Koroon.	A V Post
2	Mrs. Samina Bibi	GGHS Gara Shahbaz	GGHS No. 1 Tank	She is reverted to the post of Qaria as she is low in seniority list

Terms and Conditions:

1. She would be on probation for a period of 01 year extendable for another 01 year.
2. She will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. Her services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
4. Charge Report should be submitted to all concerned.
5. Her Inter-Se-seniority on lower post will remain intact.
6. No TA / DA is allowed for joining her duty.
7. She will give an undertaking to be recorded in their Service Books to the effect that if any over payment is made to her in light of this order will be recovered and if she is wrongly promoted, she will reversed.
8. She will give an undertaking to be recorded in her service book to the effect that that if any over payment is made to her in light of this order will be recovered and if she is wrongly promoted, she will be reversed.

District Education Officer (F)  
District Tank

Endst: No. 791-97/Promotion Dated Tank the 12/02/2017  
Copy to the:

D:\Irfan Ullah\SST Adjustment Order.Docx

06/03/2017 (Appeal for revert BPS-18-BPS-15)  
To Secretary, Edu: Ashwari

No. 1301

For Insurance Notices see reverse.  
Stamps affixed except for those of  
uninsured letters of not more than  
the initial weight prescribed in the  
Post Office Guide or on which no  
acknowledgment is due.

Rs. 60 Ps.  
AD

P/O Samina BPS  
GHS  
T.M.

Received a registered  
addressed to

Date Stamp

Initials of Receiver

Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before

Insured for Rs. (in figures)

(in words)

If insured.

Insurance fee Rs.

Name and  
address  
of send

Weight  
(in words)

Kilo  
Grams



To

2-2-

The Worthy  
Secretary to Govt of KPK  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar.

Subject:-

DEPARTMENTAL APPEAL AGAINST THE  
SENIORITY LIST THROUGH WHICH THE  
APPELLANT HAS BEEN SHOWN JUNIOR TO  
MRS GHAZALA GULFAM

THROUGH REGISTERED A.D

Respected Sir,

The Appellant humbly submits as under:-

1. **That** Appellant was serving as Senior Qaria in Government Girls High School, Gara Shahbaz of District Tank under the kind control of District Education (F) District Tank when in the month of April 2016, a post of Secondary School Teacher (SST) (BPS-16) fallen vacant.
2. **That** for the purpose of filling the above mentioned post, working paper for the meeting of departmental promotion committee was prepared by the District Education (F) Tank and Appellant was shown a single eligible and senior candidate for the said post. Copy of the working paper is annexed.
3. **That** it is a matter of record that Mrs. Ghazal Gulfam, Senior Qaria GGHS No.1 Tank was shown ineligible for promotion to the post of SST (BPS-16) in the working paper due to incompleteness of B.Ed.

4. **That** finally, consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification Dated 24.07.2014, the Appellant was promoted from the post of Senior Qaria to SST (BPS-16) through promotion Notification 6398-6404/File No.2/Promotion SST-16 Peshawar Dated 27.05.2016. Later on, the Appellant was adjusted by District Education Officer (F) Tank through her adjustment Order passed in June 2016 at GGHS Gul Imam against vacant post and Appellant also assumes the charge on 17.06.2016. She was further transferred to GGHS Gara Shahbaz SST(G) and also assume the charge on 21.07.2016. Copies of the promotion Notification Dated 27.05.2016, Adjustment Order June 2016, Charge Assumption Reports Dated 17.06.2016 and 21.07.2016 are annexed herewith.
  
5. **That** Appellant was performing her duties as Secondary School Teacher (BPS-16) GGHS Gara Shahbaz quite up to the satisfaction of her superiors when suddenly, a week ago, the Appellant was informed by District Education (F) Tank that Appellant has been reverted to her earlier post and her promotion Order has been withdrawn by your honor through Notification Dated 02.02.2017 and one an ineligible and junior candidate Mrs. Ghazal Gulfam Senior Qaria GGHS No.1 Tank has been promoted in place of Appellant as SST (BPS-16). District Education Officer (F) Tank issued her adjustment Order No 791-97 Dated 13.02.2017. Copies of the reversion Notification dated 02.02.2017 and adjustment Order dated 13.02.2017 are annexed herewith.
  
6. **That** having left with no other efficacious or alternative remedy the Appellant humbly approaches your Honor for redressal of her grievances on the following amongst other grounds.

- 24 -

— G R O U N D S

- a. **That** the impugned Seniority list through which the Appellant has illegally and malafidely been shown junior to Mrs Ghazala Gulfam is patently illegal, void abinitio, unwarranted and legally not sustainable in the eyes of law and that too has been prepared at the back of the Appellant, infringing her valuable vested rights, thus liable to be set aside on this score alone.
- b. **That** the impugned Seniority list is *non est* and ineffective upon the accrued rights of the Appellant because Mrs. Ghazala Gulfam was an ineligible and junior candidate as reflected in the working paper of the Department, thus the impugned Seniority list is liable to be set at naught.
- c. **That** Mrs. Ghazala Gulfam has illegally and malafidely been shown as Senior to the Appellant because she completed Bachelor of Education (B.Ed) on 07.10.2016 while the Appellant completed Bachelor of Education on 26.12.2013, so legally, the candidate who fulfilled the requisite criteria for the post of SST (BPS-16) earlier in time will automatically rank senior from her partner while in the instant case Mrs. Ghazala Gulfam has been given undue favour being blue-eyed child of the department, thus bulldozing the valuable and fundamental rights of the Appellant, thus entire controversy needs to be graciously considered by your honor.
- d. **That** case of the Appellant is clear cut discrimination case on the part of the Departmental Authorities, because the impugned Seniority list has been passed by keeping herein dark and that too in a very arbitrary manner.
- e. **That** while passing the impugned Seniority list, the legal and factual aspects of the controversy have not been appreciated in its true perspective by the Departmental Authority, thus the matter calling for interference by your honor.

- f. **That** the impugned Seniority list is against law, facts of the case and material available on record, thus liable to be set aside.

It is therefore, most humbly prayed that on acceptance of instant departmental appeal the impugned Seniority list may please be set aside and rectified by placing the Appellant as Senior to Mrs. Ghazal Gulfam on the ground that Appellant fulfilled the requisite criteria of the prevalent rules earlier in time

Your humble Appellant

*Samina Bibi*  
**Samina Bibi**

**Dated:-06.03.2017**

wife of Muhammad Rafiq

SST General (BPS-16)

GGHS Gara Shahbaz

District Tank





Immediate / Registered

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**DIRECTORATE OF ELEMENARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA PESHAWAR**

NO. \_\_\_\_\_ /A-17/SST/F/Appeal/DIKhan/Vol.III

Dated Peshawar the 6/4 /2017

To

The District Education Officer  
(Female) Tank

**SUBJECT:- DEPARTMENTAL APPEAL AGAINST THE SENIORITY LIST THROUGH WHICH  
THE APPELLANT HAS BEEN SHOWN JUNIOR TO MRS.GHAZALA GULFAM**

Memo:-

I am directed to refer to the subject cited above and to ask you to attend this office on 19-04-2017 at 8.00 AM alongwith Mst.Ghazala Gulfam Senior Qaria GGHS No.1 Tank and Samina Bibi SST(G) GGHS Gara Shahbaz District Tank, alongwith documents specially Departmental Promotion Committee minutes/working paper and other record related to their promotion case to further proceed into the matter.

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

Endst.No. 804-6

Copy of the above is forwarded to the:-

- 1-2 Mst.Ghazala Gulfam Senior Qaria GGHS No.1 Tank and Samina Bibi SST(G) GGHS Gara Shahbaz District Tank ( to attend this office on due date alongwith your all academic/ professional certificates & Degrees / sanad in original alongwith service book)
- 3-PA to Director E&SE Local Office.

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

\*/Noor/17\*



Telephone & Fax: 0963-510380  
Email: [deoftank@gmail.com](mailto:deoftank@gmail.com)  
Facebook: deoftank

26  
OFFICE OF THE  
DISTRICT EDUCATION OFFICER (F) TANK

No. 2412-13 /  
Dated Tank the 18/04/2017

To

1. Mst. Samina Bibi Qaria under transfer to GGHS No. 1 Tank
2. Mst. Ghazala Gulfam SST GGHS Aslam Khan

SUBJECT: HEARING REGARDING DEPARTMENTAL APPEAL

Memo:

Reference to telephonic message received from Deputy Director (Female) Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.

It is to notify that date for personal hearing in subject case has been rescheduled and now fixed on 24/04/2017.

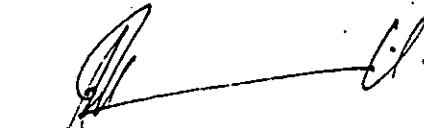
You are therefore, directed to attend the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar on above mentioned date alongwith all relevant record.

District Education Officer (F)  
District Tank

Endst: No. 2413-16 /

Copy to the:

1. PA to Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Deputy Director (Female) Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar w/r to above.
3. ADEO (Establishment) Local Office.

  
District Education Officer (F)  
District Tank

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OFFICE OF THE  
DISTRICT EDUCATION OFFICER (F) TANK

No. 3240

Dated Tank

the 9/05/2016.

To.


The Principal,  
GGHS No, I. Tank.

Subject:- SUBMISSION OF ORIGINAL / PROVISIONAL / DMC OF BED In R/O  
Mst, Ghazala Gulfam (S,Qaria).

Memo:-


I am directed that one file of Documents in R/O Mst, Ghazala Gulfam S,Qaria  
Of your school have submit in this office for promotion process, but the BEd Original/Provislonal/DMC  
Are not submit along with other Documents who is most urgent.

There for you are directed that provide the original/Provisional/DMC of BEd  
Under Roll Number AZ 675738 From AIOU Islamabad of the above mentioned teacher with in three dyas  
Otherwise her case will be pending.

  
District Education Officer,  
(Female) Tank.

Endst :-  
Copy to the :-

- 1- Mst, Ghazala Gulfam S,Qaria GGHS No,I. Tank.

  
District Education Officer,  
(Female) Tank.

28-

# VAKALATNAMA

IN THE COURT OF KPK Service Tribunal D.I.KHAN.

Samina bibi **VERSUS** Govt of KPK

TITLE Appeal

I/WE Appellant

The Above Named Samina bibi hereby appoint

**MUHAMMAD ANWAR AWAN ADVOCATE SUPREME COURT,**

in the above Captioned Cases to all or any of the following Acts Deeds & Things.

- ✓ To Appear, Act & Plead for Me/Us in the above mentioned cases in this Court/Tribunal in which the same may be tried or heard or any other proceedings out of our connected therewith.
- ✓ To Sign, Verify, File OR Withdraw all proceedings, Petitions, Appeals, Affidavits, Applications for Compromise OR Withdrawals OR for the Submission of Arbitration of the said case OR any other Documents may be Deemed Necessary OR Advisable by them by the Conduct, Prosecution OR Defense of the above case at all its stages.
- ✓ To Receive Payments, Issue receipts for all moneys that may be OR become Due & Payable to us during the course on Conclusion of the Proceedings.
- ✓ To do all other Acts & Things, Which may be Deemed Necessary OR Advisable during the course of Proceedings.

AND HEREBY AGREE;

- To Ratify Whatever Advocates may do the Proceedings.
- Not to Hold the Advantages Responsibilities if the said case be proceed Ex-parte OR Dismissed in Default in Consequence of their Absence from the Court when it is called for Hearing. .
- That the Advocates shall be entitled to withdraw from the Prosecution of the said case if the Whole or any part of the Agreed Fee Remain Un-Paid.
- That Advocates may be Permitted to argue any other point at the time of Arguments.

In Witness Whereof I/We have signed this Vakalatnama here under the Contents of which have been Read/Explained to Me/Us which is fully understood by Me/Us.

Dated: 29/5/17

Accepted By:

*Anwar Adv.*

*Samina Bibi*

SIGNATURE OF EXECUTANT (S)

0311-579 2525.

**MUHAMMAD ANWAR AWAN  
ADVOCATE SUPREME COURT  
03339962231**

(1)

Before The KPK Service Tribunal  
Peshawar.

Appeal No. — of 2017.

Samina Bibi V-s Director etc.

Appeal u/s 4 of KPK  
Service Tribunal Act.

Written Reply on behalf  
of Respondent No. 6.

Preliminary objections:-

- i. That the appellant has got no cause of Action.
- ii. That the appellant has got no locus standi.
- iii. That the appeal of the appellant is false and frivolous and is based on malafide only to give mental torture and agony to the respondent.
- iv. That the appellant does not approach to this court with clean hands.

- v. That the appellant has committed concealment of fact and deliberately concealed the material facts from this august court.
- vi. That the appeal of the appellant is not maintainable in its present form and is liable to be dismissed.

### BRIEF FACTS:-

1. That the para no. 1 of the brief facts of the instant appeal is incorrect and not admitted because the present respondent is the Senior Clerk. The total service of the appellant in education department is near about ten years but the present respondent was performing her duty in education department from the last 30/31 years.

2. That the para No. 2 is correct.
3. That the para No. 3 of the brief facts of the instant appeal is incorrect. Hence not admitted. The present respondent was senior Clavice and was also eligible / entitled for promotion. The present respondent is promoted purely on merit basis.

4. That the para No. 4 is incorrect.

The present respondent was legally entitled for promotion and promotion of the present respondent is made purely on merit basis. Unfortunately due to clerical mistake in working

paper, I was deprived. The present respondent filed an appeal to the respondent.

Resultantly the present respondent was promoted after

- fulfilling all the coodal formalities. The appellant was ineligible to the said post.
5. That the para no. 5 of the brief facts of the instant appeal is not related to the present respondent, hence need not to reply.
  6. That the para no. 6 is incorrect because the present respondent was not eligible and senior condidate which is also crystal clear from the academic and service record of the present respondent.  
(Attested copies are attached herewith).
  7. That the para 7 is incorrect and not admitted because the appellant has got no cause of action and locus standi.



## GROUNDS:-

- i. That the para no. 1 of the grounds is incorrect. The appellant has committed concealment of fact and deliberately concealed the material facts. The appellant is junior to the present respondent. The promotion of the respondent is purely made on merit basis. No illegality has been committed in behalf of the remaining respondent.
- ii. That the para no. 2 is incorrect. The seniority list is true and correct and purely based on bonafide intentions.
- iii. That the para no. 3 is incorrect. The seniority of the present respondent is evident from the academic and service record of the present respondent which is already attached with the instant written reply.

(6)

- iv. That the para no. 4 is incorrect.
- v. That the para no. 5 is incorrect. All the coelal formalities were fulfilled by the department. The seniority list is purely on merit basis.
- vi. That the para no. 6 is incorrect. The seniority list is according to law and purely on merit basis.

It is, therefore, humbly prayed that the appeal of the appellant may very graciously be dismissed.

Your humble Respet. nob.  
Ghezala Gulbani  
Through Counsel.

dt. 26/11/2018

Hayat Ullah  
Barki

Advocate H.C.

نہرو صاحب ڈائریکٹ ایجوکیشن ڈیپارٹمنٹ  
حکومت پنجاب ایجوکیشن ڈیپارٹمنٹ  
لاہور

انٹرنیٹ پر لکھی گئی درخواست پر  
ڈیپارٹمنٹ میں فائلنگ کے لیے  
مہربانی کی ہے۔

یہ درخواست 2016 میں ہی آئی تھی  
میں نے اس وقت تک اسے  
ڈیپارٹمنٹ میں رکھا ہے۔  
جس کی وجہ سے اسے  
ڈیپارٹمنٹ میں رکھا گیا ہے۔  
اس کی وجہ سے اسے  
ڈیپارٹمنٹ میں رکھا گیا ہے۔  
اس کی وجہ سے اسے  
ڈیپارٹمنٹ میں رکھا گیا ہے۔

محرم گزشتہ

- 1۔ ڈائریکٹر تعلیمات اعلیٰ سندھ
- 2۔ سیکرٹری ایجوکیشن خیر سیر انٹرا

Attested  
[Signature]  
110

(For use in Police Department only).

2-5-89

Handwritten signature

Principal  
Girls High School, Tank

- 1. Passed B.S.C. Examination in 1986 (A) from B.O.S.E Peshawar
- 2. Under Roll No. 34085 Marks obtained 430/850 result declared
- 3. on 7-8-1986.

Verification Roll No. dated received back

- 2. Passed F.A. Examination in 1995 (A) from B.O.S.E Peshawar. Under Roll No. 69225 Marks obtained 539/1100 result declared on 15 Oct. 1995

Left thumb impression.

Signature of Principal

- 3. Passed B.A Examination session (2008) (A) from Gomal University Dikhan Roll No. 9163

Qualification - Marks obtain 314/550 Result declared 10/9/2008

English

First Arts

Pashtu

B. L. or B. A.

- 3. Urdu passed M.A Examination Session 2013 (A) from Gomal University Dikhan Roll No. 3127

Plan-drawing

Pleadership examination Training School Final Examination

Finger print

Other qualifications

Drill instructing

Court duties

Reserve duties

- 4. Passed B.Ed Examination Session 2015 (Spring) from AIOU Islamabad Roll No. AZ675738
- Marks obtained 601/900 grade B Result Declaration 4/1/16

5

Handwritten signature and notes in Urdu

N. B.—Line to be drawn under the qualification possessed.

1944

Principal G.H.S No.1



OFFICE OF THE  
DISTRICT EDUCATION OFFICER (F) TANK


ADJUSTMENT ORDER:

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar Notification Endst: No. 3598-3604/F.No. 2/Promotion SST B-16 dated 28/10/201 & in pursuance to Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar Notification Endst: No. 878-80 F. No. 2/A-17/Promotion SST B-16/Tank dated 02/02/2017, following SST (G) are hereby adjusted against the school noted against each in BPS-16 (15880-1280-54280) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the Terms & Conditions given below while Mrs. Samina Bibi SST GGHS Gara Shahbaz is hereby reverted to the post of Qaria as she is low in seniority list in the light of said notification and adjusted to the school noted against with immediate effect.

S.#	Name of Official	Previous place of posting	Place of Posting	Remarks
1	Mrs. Ghazala Gulfam SST	GGHS No. 1 Tank	GGHS Aslam Khan Koroona.	A.V Post
2	Mrs. Samina Bibi	GGHS Gara Shahbaz	GGHS No. 1 Tank	She is reverted to the post of Qaria as she is low in seniority list

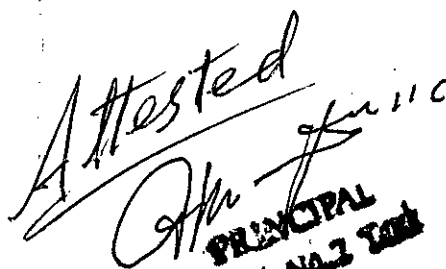
Terms and Conditions:

1. She would be on probation for a period of 01 year extendable for another 01 year.
2. She will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. Her services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be preceded under the rules framed from time to time.
4. Charge Report should be submitted to all concerned.
5. Her inter-Se-seniority on lower post will remain intact.
6. No TA / DA is allowed for joining her duty.
7. She will give an undertaking to be recorded in their Service Books to the effect that if any over payment is made to her in light of this order will be recovered and if she is wrongly promoted, she will reversed.
8. She will give an undertaking to be recorded in her service book to the effect that that if any over payment is made to her in light of this order will be recovered and if she is wrongly promoted, she will be reversed.

  
District Education Officer (F)  
District Tank

Endst: No. 791-92 /Promotion Dated Tank the 13 /02/2017  
Copy to the:

D:\Irfan Ullah\SST Adjustment Order.Docx

  
PRINCIPAL  
G.H.S No. 2 Tank

1. Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Deputy Director Establishment (Female) Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. District Accounts Officer, Tank
4. ADEO (Estab) Local Office.
5. Principal / Headmistress concerned.
6. Officer concerned.
7. Office File.

District Education Officer (F)  
District Tank

Attested  
Principal  
G.P.S. No. 2 Tank



Telephone & Fax: 0963-510380.  
Email: [deoftank@gmail.com](mailto:deoftank@gmail.com)  
Facebook: deoftank

**OFFICE OF THE  
DISTRICT EDUCATION OFFICER (F) TANK**

**ADJUSTMENT / TRANSFER:**

In the light of Notification of worthy Secretary Govt: of Khyber Pakhtunkhwa E&SED No. SO (PE) 4-5/Meeting/2016/Transfer/Posting dated 17/07/2017 & upon the proposal of S.D.E.O (F) Tank / ADEO (Establishment), following Teachers are hereby transferred in the best interest of public service with immediate effect.

S.#	Name of Teacher	From	To	Remarks
1	Mst. Hayyat Bibi SST	GGHS Toran Nau	GGMS Darraki	Against Vacant Post
2	Mst. Ghazala Gulfam SST	GGHS Aslam Khan	GGHS Toran Nau	Vice S. # 01

**Note.**

1. Charge report should be sent to all concerned.
2. No TA/DA is allowed.

  
District Education Officer (F)  
District Tank

Endst: No. 4661-65 /


Dated

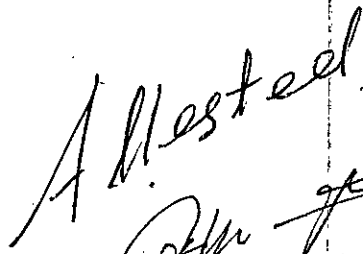
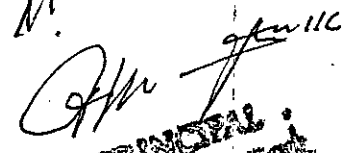
Tank

the 22 /08/2017

Copy to the:

1. Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. ADEO (Establishment) Local Office.
3. DMO, IMU Tank.
4. Headmistress schools concerned.
5. Officials concerned.

  
District Education Officer (F)  
District Tank

  
  
PRINCIPAL  
GGHS TORAN NAU

## CERTIFICATE OF TRANSFER OF CHARGE

Certificate that we have on the forenoon of this day dated 14/2/2017 respectively made over and received charges of the post of SST (G) vide District Education Officer (F) Tank Endst NO.791-97 dated 13/2/2017.

Particulars cash and important secret and confidential document handed are noted on the river: -

Signature of Relieved  
Govt: Servant. \_\_\_ Vacant

Designation

Station: GGHS Aslam khan

Dated-: 14/2/2017 (F/N)

Signature: of Relieving *Ghazala Gulfam*  
Govt: Servant- Ghazala Gulfam  
Name:  
Designation. SST(G)

Endst: NO. 351-54 /

Dated 14/2/2017 GGHS Aslam khan koroona Tank

Copy forwarded for information and for further n/a to the: -

1. Director Elementary and Secondary Education Khyber Pakhtunkhwa.
2. DAO. Tank
3. District Education Officer (F) Tank
4. Official concerned

*[Signature]*  
Head Mistress  
GGHS Aslam Khan kor: Tank  
G.G.H.S Aslam Khan  
Koroona Tank Add: 1

Attested

*[Signature]*  
G.O.B NO. 2 14/2



# علامہ اقبال اوپن یونیورسٹی، اسلام آباد



## فارم برائے امتحانی مشق

حل شدہ امتحانی مشق کے ساتھ مقررہ تاریخ سے پہلے اس فارم کے 3 پرت اپنے ٹیوٹر کو ارسال کریں

یہ حصہ طالب علم پُر کریں

نام ٹیوٹر 20 تھوار ڈال S.S.T

نام طالب علم عبدالملک

کامل پتہ (ٹیوٹر)

رول نمبر A2-675738

گھاٹوں، بابلی

کامل پتہ (طالب علم)

کوسٹل عظیم آباد

عبدالغفور انور

صائب پور

20 15

سمسٹر بہار  
خزاں

کورس کا نام B-Ed

20

کوڈ نمبر 513 مشق نمبر

(نیچے دونوں تاریخیں طالب علم ضرور پُر کریں)

مقررہ تاریخ 15-4-27 روایتی کی تاریخ 15-4-27 طالب علم کے دستخط *Abdullah*

یہ حصہ ٹیوٹر پُر کریں گے

نام مطالعاتی مرکز

گورنمنٹ کالج سکول علامہ اقبال

امتحانی مشق وصول کرنے کی تاریخ

سوال نمبر	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
مائل	17	18	18	18	18										
کل نمبر															

ٹیوٹر کی رائے

تاریخ واپسی

دستخط *Abdullah*

نوٹ: اس فارم کی فوٹو کاپی بھی استعمال ہو سکتی ہے۔

*Attested*

*Principal*  
PRINCIPAL  
G. J. A. N. I. S. S.

# علامہ اقبال اوپن یونیورسٹی، اسلام آباد



## فارم برائے امتحانی مشق

حل شدہ امتحانی مشق کے ساتھ مقررہ تاریخ سے پہلے اس فارم کے 3 پرت اپنے ٹیوٹر کو ارسال کریں

یہ حصہ طالب علم پُر کریں

نام طالب علم	عزالہ حلقام
رول نمبر	AZ 675738
مکمل پتہ (ٹیوٹر)	محمد علی
مکمل پتہ (طالب علم)	محمد علی
کوریس کا نام	B.Sc
کوڈ نمبر	513
مشق نمبر	2
مقررہ تاریخ	15/16/15
رواگی کی تاریخ	15/6/15
طالب علم کے دستخط	Chazada Hussain

یہ حصہ ٹیوٹر پُر کریں گے

نام مطالعاتی مرکز	اسکول جلال آباد
ضلع	جلال آباد
امتحانی مشق وصول کرنے کی تاریخ	
ٹیوٹر کی رائے	
تاریخ واپسی	
دستخط	

نوٹ: اس فارم کی فوٹو کاپی بھی استعمال ہو سکتی ہے۔

Attested  
Principal  
G.P.S. H.C. 111



Allama Iqbal Open University  
Web-Based Result Intimation Card

Degree Level: B.ED (ARTS)

*Handwritten signature and date: 2/11/16*

Name: GHAZALA GULFAM

Roll No: AZ675738

Father Name: HAJI GHULAM SARWAR

Reg No: 05NTK0107

Address: C/O ABDUL AZIZ OIL MERCHANT SABIR BAZAR

Tehsil: TANK

District: TANK

Code	Total Assignment Marks	Examination Marks	Conflated Marks	Grade	Result
Autumn: 2014					
0512	165	54	63	B	PASS
0513		50			FAIL
0514	160	58	65	B	PASS
0518	191	59	70	A	PASS
0651	175	40	54	C	PASS
0652	185	52	64	B	PASS

\* AREAP=Again Re-appear, \* REAP=Re-appear, \* ABST=Absent

Printed on: Monday, November 23, 2015 11:45:05 PM

Note: This is electronic version of result card. Errors and omissions excepted.

Controller of Examination

*Attested*  
*Handwritten signature*  
23/11/16

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD  
(Examinations Department)



REVISED/DUPLICATE RESULT INTIMATION CARD

Semester:  Spring /  Autumn 2014 Region D.I. Khan.

Roll No. A2-675738 Registration No. 05-NTK-0107

This is to inform that Mr./Ms. Ghazala Gulshan  
Has declared **PASS** in the following Course(s) of **B.Ed** Programme:

S.NO.	COURSE CODE	MARKS	GRADE	POSITION
	<u>513</u>	<u>63</u>	<u>B</u>	<u>Pass</u>

Result Declaration Date: 18/8/15

Signature of Dealing Official: [Signature]

[Signature]  
**CONTROLLER OF EXAMINATIONS**

**Note:** This result card is issued, errors and omissions accepted, as a notice only. Any entry appearing in it does not itself confer any right or privilege independently to the grant of a proper certificate/degree, which will be issued under the regulations in due course of time.

Attested  
[Signature]  
**PRINCIPAL**  
**G.I.B. N.I.T. 1401**

# Allama Iqbal Open University Islamabad



246298

Serial No. \_\_\_\_\_

Certified that Mr. / Ms. **GHAZALA GULFAM**

Son / Daughter of **HAJI GHULAM SARWAR KHAN**

Registration No: **05NTK0107**

Roll No: **AZ675738**

having successfully completed the prescribed requirements

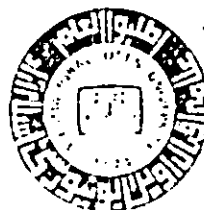
in semester **SPRING 2015** is awarded the degree of

## Bachelor of Education (B.Ed)

He/She has secured **67** % marks and has been placed in **B** grade.

*Muham*

CONTROLLER OF EXAMINATIONS



VICE-CHANCELLOR

Result declared on: January 14, 2016

Date of Issue: October 26, 2016

Attested

Muhammad Zaman  
Supdt D E O (F)  
E&S Education Tank

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

Attested  
*[Signature]*  
116

# ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD

## PROVISIONAL RESULT CARD



10-

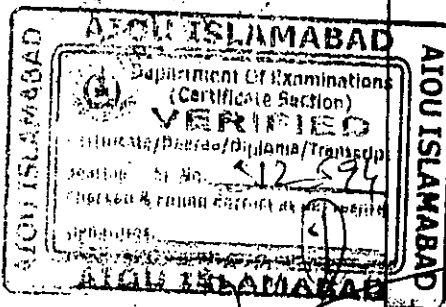
Name: SAJJINA YOUSAF  
 Father's Name: MUSTAFA HANIF  
 Address: SHAN ROOK WELAR HANSOOD BAZAR DANA ROAD  
 Tehsil: TANK  
 District: TANK

Roll No. AG627770  
 Registration No. 04NTK0259  
 Final Semester SPR-2013

has successfully completed BACHELOR OF EDUCATION (B. ED)

The detail of passed courses is as under:-

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
AUT-2	0651	ENGLISH (COMPULSORY)	100	54
AUT-2	0518	EDUCATIONAL PSYCHOLOGY & CURRICULUM	100	60
AUT-2	0514	EVALUATION, GUIDANCE & RESEARCH	100	63
AUT-2	0513	SCHOOL ORGANIZATION	100	54
SPR-3	0655	WORKSHOP & TEACHING PRACTICE	100	84
SPR-3	0654	TEACHING OF ISLAMIAT	100	53
SPR-3	0517	TEACHING OF PAKISTAN STUDIES	100	54
SPR-3	0652	ISLAM, PAKISTAN AND MODERN WORLD	100	59
SPR-3	0657	PERSPECTIVES OF EDUCATION	100	67



Assistant Controller of Examinations  
 Verification Section  
 Allama Iqbal Open University

Total Marks / Obtained: 900 / 548  
 Percentage / Grade: 61.0 B

Result Declared on: DECEMBER 26, 2013  
 Date of issue: JANUARY 07, 2014

*Signature*  
 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 under the rules/regulations on the basis of the original record of the university student.

Attested  
*Signature*  
 PRINCIPAL  
 28-1-2014

Serial No. GU 000557

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

**GOMAL UNIVERSITY**  
**DERA ISMAIL KHAN**  
**KHYBER PAKHTUNKHWA, PAKISTAN**



Registration No. 6660-GOMAL-07

Roll No. 9163

( Session 2008 ANNUAL )

GHAZALA GULFAM

DAUGHTER

of

HAJI GHULAM SARWER

a student of TANK DISTRICT

has passed the prescribed Examination in JUNE/JULY 2008

is hereby awarded the Degree of

**BACHELOR OF ARTS**

in SECOND Division by GOMAL UNIVERSITY.



The Examination was taken as a whole ~~in parts~~

Result declared on SEPTEMBER 11, 2008

Countersigned.

  
Controller of Examinations

  
Vice Chancellor

  
PRINCIPAL  




**DETAILED MARKS CERTIFICATE**  
**BACHELOR OF ARTS PART II**

Held in June-July 2008  
Session 2008/Annual

Roll No: 9163

Name: Ghazala Gulfam

The Candidate secured the following marks & has been placed in 2nd Division

SUBJECT	Total No of Marks Allotted	MARKS OBTAINED	
		In Figure	In Words
Political Science	75	-	-
History	75	-	-
Geography	75	-	-
Statistics	75	-	-
Economics	75	-	-
Persian	75	-	-
Arabic	75	-	-
English Elective	75	-	-
Pashto	75	-	-
English	75	32	Thirty Two
Islamic Studies	75	48	Forty Eight
Law	75	-	-
Urdu	75	53	Fifty Three
Sociology	75	-	-
Math Additional	75	-	-
Aggregate Part-I	285	157	One Hundred and Fifty Seven
Math B	75	-	-
Pak Studies	40	24	Twenty Four
Electronics	75	-	-
Home Economics	75	-	-
Psychology	75	-	-
Math A	75	-	-
HPE	75	-	-
<b>Total Marks</b>	<b>550</b>	<b>314</b>	<b>Three Hundred Fourteen</b>

The Examination was taken as an Whole/In Parts

Result Declaration Date 10/09/2008

Additional Controller of Examinations  
City Campus, Gomal University,  
Dera Ismail Khan.

Attested  
  
PRINCIPAL  
G.H.S No. 2 Tost



# GOMAL UNIVERSITY

## DERA ISMAIL KHAN

### KHYBER PAKHTUNKHWA, PAKISTAN



(Session 2013/A )

GHAZALA GULFAM Son/Daughter of HAJI GHULAM SARWER and  
a student of DISTT: TANK

having passed the prescribed examination in APRIL/MAY 20 14,

is this day admitted by the GOMAL UNIVERSITY to the DEGREE of

## MASTER OF ARTS

in the FIRST Division.

The subject of examination being ISLAMIYAT

The Examination was taken as a whole/in parts.

Registered No. 6660-GOMAL-07


Roll No. 3127

Result declared on DECEMBER 22, 20 14

Countersigned

  
Controller of Examinations

  
Vice-Chancellor

Attested  
  
PRINCIPAL  
GOMAL UNIVERSITY

GOMAL UNIVERSITY  
N: 248557



DERA ISMAIL KHAN  
(K. P. K PAKISTAN)

**DETAILED MARKS CERTIFICATE**  
**MASTER OF ARTS ISLAMIYAT FINAL (NEW COURSE)**

Held in April-May 2014

Session 2013/Annual

Roll No: 3127


Name: GHAZALA GULFAM

The Candidate secured the following marks & has been placed in 1st Division.

SUBJECTS	Total No of Marks Allotted	MARKS OBTAINED	
		In Figure	In Words
Al-Fiqah O-Usool-e-Fiqah	100	63	Sixty Three
Ilmul Kalam	100	74	Seventy Four
Hadis O Uloom Ul Hadis	100	60	Sixty
Islam And Jadeed Muashi Nazriat	100	46	Forty Six
Tarikh-e-Islam	100	61	Sixty One
Viva Voce	100	67	Sixty Seven
Aggregate Previous	500	284	Two Hundred and Eighty Four
<b>Total Marks</b>	<b>1100</b>	<b>655+5=660</b>	<b>Six Hundred and Sixty</b>

Result Declaration Date 22/12/2014

Errors & Omissions Accepted

  
Controller of Examinations  
Gomal University, D.I.Khan

*Attested*  
  
PRINCIPAL  
GOMAL UNIVERSITY  
D.I.KHAN

**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.**

Appeal No. 638 of 2017

Samina Bibi Versus Govt. of Khyber Pakhtunkhwa

**PARA WISE COMMENTS ON BEHALF OF RESPONDENT NO. 1, 2, 3 & 5**

**RESPECTFULLY SHEWETH:**

**PRELIMINARY OBJECTIONS**

1. That the appellant has got no cause of action or locus standi to file the instant appeal.
2. That the appellant deliberately concealed the material facts from this Honorable Court.
3. That the appeal in hand is a weak case and has no legal force.
4. That the appellant does not come to this Honorable Court with clean hands.

**Brief Facts**

1. Para No.1 is correct to the extent of posting/serving as senior Qaria in GGHS Gara Shahbaz Tank but she has been transferred to GGHS No. 1 Tank (Copy enclosed as annex "A")


2. Para No.2 is correct.
3. Para No.3 is incorrect because some errors/omissions were made un-intentionally, resultantly the appellant was shown a single senior and eligible candidate for the said post.
4. Para No.4 is correct to the extent of that Mrs Ghazala Gulfam senior Qaria GGHS No.1 Tank was shown Ineligible for promotion to the post of SST. It is pertinent to mention here that Mrs Ghazala Gulfam senior Qaria GGHS-No.1 Tank was eligible for promotion but unfortunately due to clerical mistake in working papers she was deprived.
5. Para No.5 is related with official record.
6. Para No.6 is incorrect that the appellant was reverted to her previous post but Mrs.Ghazala Gulfam (Respondent No. 6) was promoted after fully satisfaction/recommendation of the Departmental Recommendation Committee. It is pertinent to mention here that respondent no. 6 filed an appeal to the undersigned office, after fulfilling all the codal formalities, the appellant was reverted according to law. (Relevant documents are attached as annex: "B,C & D" )
7. Para No.7 is incorrect.


**GROUND**S

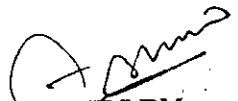
- i. That para no.(i) is incorrect.
- ii. That para no.(ii) is incorrect.


- iii. That para no.(iii) is incorrect because the appellant was junior to Respondent no.6.( Seniority list is annex: as "E")
- iv. That para no.(iv) is incorrect, based on ulterior motives, malafide intension because no discriminations exist on behalf of the official respondents.
- v. That para no.(v) is incorrect, all codal formalities were fulfilled. The appellant was provided opportunity of personal hearing by Respondent No. 1.(Annex: as "F")

In view of the above, it is respectfully requested that the present/instant appeal may kindly be dismissed in favour of respondents.

  
**DIRECTOR**  
E & SE KPK Peshawar  
(Respondent No.1)

  
**DISTRICT EDUCATION OFFICER**  
(Female) Tank  
(Respondent No.2)

  
**SECRETARY**  
E & SE Department  
KPK Peshawar  
(Respondent No.5)

  
**Sub-DISTRICT EDUCATION**  
OFFICER (Female) Tank  
(Respondent No.3)

Order

Tank SST (Female)



# Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

74

PH No. 091-9210389, 9210938,  
9210437, 9210957, 9210468  
Fax 091-9210936, 0300-33857  
E-mail rafiq\_kk851@yahoo.com

## Notification

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No SO(PE)/J-5/SSRC/Meeting/2013/Teaching Cadre dated 27<sup>th</sup> July, 2014, the following SCFs/CFs, SDMs/DMs, SATs/ATs, SSTs/TTs, Senior Qarias/Qarias, PSHTs/SPSTs/PSTs are hereby promoted to the post of SST (Bio-Chem), SST (Phy-Maths), SST (General) noted against each BPS-16 (Rs. 15880-1280-54280) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and further they will be posted by the District Education Officer concerned.

### A. SST (General)

PROMOTION OF Qari/SQaria To SST (General) BPS-16.

Total No. of SST General (F) vacant posts.	03
25 % share initial recruitment	00
75 % share for promotion	03
10 % share of promotion of Qaria/SQaria	01
Posts available for promotion	01

### Recommended for promotion

S.No	S.L. No	Name of Official & Present Place of Posting	Date of Birth	Date of Appoint as Regular SQaria	Qualification	Remarks
01	02	Ghazala Gulsum GGHS No.1 Tank	01-02-1969	03-02-1987	MA/B.Ed	Services placed at the disposal of DEO(F) Tank for further posting against SST(General) post.
02	03	Samina Bibi GGHS Gara Shahbaz	01-08-1978	19-09-2007	MA/B.Ed	Her promotion order is withdrawn being junior and further her services are placed at the disposal of DEO(F) Tank for further posting against a vacant post of the job.

### Terms and conditions:-

1. She should be on probation for a period of one year extendable for another one year.
2. She will be governed by such rules and regulations as may be laid down in this regard.
3. Her services can be terminated at any time, in case her performance is not satisfactory during probationary period. In case of misconduct, she shall be proceeded under the relevant provisions of the service rules.
4. Charge report should be submitted to all concerned.
5. Her Inter-Se- seniority on lower post will remain intact.
6. No T.A/DA is allowed for joining her duty.
7. She will give an undertaking to be recorded in her service file that if any change of appointment is made to him in light this order will be recovered and if he/she is not recovered, the Government will not be responsible for the same.
8. Before handing over charge once again her document may be checked if she does not the required relevant qualifications as per rules, she may not be handed over charge of the post.

(Muhammad Rafiq Khattak)

Director  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar.

Indst: No. 878-80

/ File No.2/A-17/Promotion SST B-16/Tank  
Dated Peshawar the 27/7/2014

Copy forwarded for information and necessary action to the:-

1. District Education Officer (F) Tank
2. District Accounts Officer Tank
3. Official Concerned.
4. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
5. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
6. M/File

*(Signature)*  
Director (for Peshawar)

ADJUSTMENT ORDER

Consequent upon the recommendations of the Department Promotion Committee and in pursuance of the Directorate Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar Notification Endst: No. 3598-3604/F.No. 2/Promotion SST B-16 dtd 28/10/201 & in pursuance to Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar Notification Endst: No. 878-80 F. No. 2/A-17/Promotion SST B-16/Tank dtd 02/02/2017, following SST (G) are hereby adjusted against the school noted against each in BP (15880-1280-54280) plus usual allowances as admissible under the rules on regular basis on the existing policy of the Provincial Government, on the Terms & Conditions given below while Samina Bibi SST GGHS Gara Shahbaz is hereby reverted to the post of Qaria as she is in seniority list in the light of said notification and adjusted to the school noted against immediate effect.

S.#	Name of Official	Previous place of posting	Place of Posting	Remarks
1	Mrs. Ghazala Guliam SST	GGHS No. 7 Tank	GGHS Aslam Khan Koroma.	AV Post
2	Mrs. Samina Bibi	GGHS Gara Shahbaz	GGHS No. 1 Tank	She is reverted to the post of Qaria as she is in seniority list

Terms and Conditions:

1. She would be on probation for a period of 01 year extendable for another 01 year.
2. She will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. Her services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
4. Charge Report should be submitted to all concerned.
5. Her later-Sr-seniority on lower post will remain intact.
6. HRA / DA is allowed for joining her duty.
7. She will give an undertaking to be recorded in their Service Books to the effect that over payment is made to her in light of this order will be recovered and if she is ever promoted, she will reversed.
8. She will give an undertaking to be recorded in her service book to the effect that that over payment is made to her in light of this order will be recovered and if she is ever promoted, she will be reversed.

District Education Officer (F)  
District Tank

Endst: No. 791-92/Pre. notion Dated \_\_\_\_\_ Tank \_\_\_\_\_  
Copy to the:

the 02/03/2017

D:\Afrin Ullah\SST Adjustment Order.Docx

Elementary and Secondary Education



72 P-3  
DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA PESHAWAR

NO. \_\_\_\_\_/A-17/SST/F/Appeal/DIKhan/Vol.III

Dated Peshawar the 11/4/2017

To

The District Education Officer  
(Female) Tank

SUBJECT:- DEPARTMENTAL APPEAL AGAINST THE SENIORITY LIST THROUGH WHICH THE APPELLANT HAS BEEN SHOWN JUNIOR TO MRS.GHAZALA GULFAM;

Memo:-

I am directed to refer to the subject cited above and to ask you to attend this office on 19-04-2017 at 8.00 AM alongwith Mst.Ghazala Gulfan Senior Qaria GGHS No.1 Tank and Samina Bibi SST(G) GGHS Gara Shahbaz District Tank, alongwith documents specially Departmental Promotion Committee minutes/working paper and other record related to their promotion case to further proceed into the matter.

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

Endst.No. 874-6

Copy of the above is forwarded to the:-

1-2 - Mst.Ghazala Gulfan Senior Qaria GGHS No.1 Tank and Samina Bibi SST(G) GGHS Gara Shahbaz District Tank (to attend the office on the date cited alongwith your all academic/ professional certificates & Degrees /sanad in original alongwith service book)

3-PA to Director E&SE Local Office.

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

\*/1007/7\*



وزارت تعلیم کے زیر نگرانی اور نگرانی میں ہونے والے امتحانوں میں  
مقامی سطح پر ہونے والے امتحانوں میں ہونے والے امتحانوں میں ہونے والے امتحانوں میں  
مقامی سطح پر ہونے والے امتحانوں میں ہونے والے امتحانوں میں ہونے والے امتحانوں میں

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مقامی سطح پر ہونے والے امتحانوں میں ہونے والے امتحانوں میں ہونے والے امتحانوں میں

میں نے اگست 1971ء میں ہونے والے امتحانوں میں ہونے والے امتحانوں میں ہونے والے امتحانوں میں  
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میں نے اگست 1971ء میں ہونے والے امتحانوں میں ہونے والے امتحانوں میں ہونے والے امتحانوں میں  
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مقامی سطح پر ہونے والے امتحانوں میں ہونے والے امتحانوں میں ہونے والے امتحانوں میں

- ① ایف اے کے امتحانوں میں ہونے والے امتحانوں میں ہونے والے امتحانوں میں
- ② ایف اے کے امتحانوں میں ہونے والے امتحانوں میں ہونے والے امتحانوں میں

**WORKING PAPERS FOR DEPARTMENTAL PROMOTION COMMITTEE FOR THE  
PROMOTION OF S.Qaria / Qaria TO SST (General) B-16**

Total No of Vacant SST (General) Posts = 25

Method of Recruitment.	Total Posts	Already promoted	Next to be promoted
25% Initial Recruitment.	06	05	01
75% by Promotion	40% by promotion from SCT/CT	10	09
	20% by promotion from PSHT/SPST/PST	05	05
	4% by promotion from SDM/DM	01	01
	4% by promotion from SAT/AT	01	01
	4% by promotion from STT/TT	01	Nil
	3% by promotion from S.Qaria/Qaria	01	0
	<b>Total</b>	<b>25</b>	<b>21</b>

**LIST OF S.Qaria / Qaria (F) FOR THE PROMOTION TO SST.**

S#	S.L. NO	Name of official & present place of posting	Date of Birth	Date of appointment as regular S.Qaria / Qaria	Qualif:	Whether eligible for promotion	Remarks
1-	2	Mrs, Ghazal Gulfam S.Qaria GGHS No, I. Tank	01/02/1969	03/02/1987	MA	No	Due to BED income
2-	4	Mrs, Samina Bibi S.Qaria GGHS Gara Shahbaz.	01/08/1978	19/03/2007	MA	Yes	

**CERTIFICATES**

1- It is certified that all the S.Qaria/Qaria (Female) included in the panel for the promotion to SST (General) Post.

- a- Hold the posts on regular basis and none of them is holding the post on adhoc/leave charge basis/contract.
  - b- Have completed the required minimum length of qualifying service and qualifications as required for promotion to the post of SST under the rules.
  - c- None of them is on deputation to any organization under the Federal / Provincial / Autonomous / Semi-Autonomous / International organization.
  - d- Neither any disciplinary/departmental proceedings/anti-corruption/judicial enquiry is pending against them nor has any penalty been imposed upon any one of them during the last five years.
  - e- No one is on long leave/Ex-Pakistan leave.
  - f- Their ACRs, Synopsis are free from adverse remarks.
  - g- They are all alive and serving.
  - h- Their appointment orders against S.Qaria / Qaria posts are attached herewith.
  - i- The Seniority list of official / officers is final, undisputed and not subject to challenge.
- 2- The Departmental Promotion Committee is requested to determine the eligibility and suitability of the above S.Qaria / Qaria for Promotion to SST (General) Post.

District Education Officer (F)  
District Tank.



Telephone & Fax: 0963-510380  
Email: deoftank@gmail.com  
Facebook: deoftank

OFFICE OF THE  
DISTRICT EDUCATION OFFICER (F) TANK

Dated

Tank

No. 2412-13  
the 12/04/2017

To

1. Mst. Samina Bibi Qaria under transfer to GGHS No. 1 Tank
2. Mst. Ghazala Guliam SST GGHS Aslam Khan

SUBJECT: HEARING REGARDING DEPARTMENTAL APPEAL

Memo:

Reference to telephonic message received from Deputy Director (Female) Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.

It is to notify that date for personal hearing in subject case has been rescheduled and now fixed on 24/04/2017.

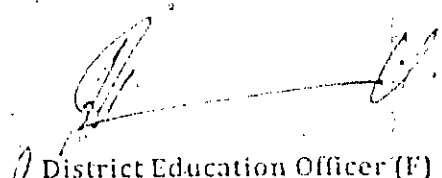
You are therefore, directed to attend the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar on above mentioned date along with all relevant record.

District Education Officer (F)  
District Tank

Endst: No. 2413-16 /

Copy to the:

1. PA to Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Deputy Director (Female) Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar w/r to above..
3. ADEO (Establishment) Local Office.

  
District Education Officer (F)  
District Tank

No. 001-94 30,0800-3.  
mailto:office@kse.org.pk

NOTIFICATION

Consequent upon the decision of the Committee and in pursuance of the Government of Punjab Recruitment Notification No SO(PE)/1-5/SSRC/Meeting/2013/Teaching Cadre dated 18/05/2013 for SCIs/CTs, SLMs/DVs, SATs/ATs, STTs/TTs, Senior Quaries/Quaries and SSI (Bio-Chem), SSI (Phy-Maths), SSI

given to the Officer concerned  
SSRC  
recruit.

for the purpose of recruitment

- No. 1-1-2013-122
- No. 1-1-2013-122
- No. 1-1-2013-122
- No. 1-1-2013-122
- No. 1-1-2013-122
- No. 1-1-2013-122

for information to be submitted to the Accounts Officer (A.O.) of the concerned offices.  
Secretary to Government  
Director H&SE Khyber Pakhtunkhwa

ADJUSTMENT ORDER:

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar Notification Endst: No. 3598-3604/E.No. 2/Promotion SST B-16 dated 28/10/201 & in pursuance to Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar Notification Endst: No. 678-80 E. No. 2/A-17/Promotion SST B-16/Tank dated 02/02/2017, following SST (G) are hereby adjusted against the school noted against each in BPS-10 (1530-1280-54280), plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the Terms & Conditions given below while Mrs. Samina Bibi SST GHS Gara Shalibaz is hereby reverted to the post of Qana as she is low in seniority list in the light of said notification and adjusted to the school noted against with immediate effect.

S.#	Name of Official	Previous place of posting	Place of Posting	Remarks
1	Mrs. Ghazala Gulferm SST	GHS No. 1 Tank	GHS Askari Khan T.V Post Rawana	
2	Mrs. Samina Bibi	GHS Gara Shalibaz	GHS No. 1 Tank	She is reverted to the post of Qana as she is low in seniority list

Terms and Conditions:

1. She would be on probation for a period of 01 year extendable for another 01 year.
2. She will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. Her services can be terminated at any time, in case they are considered to be unsatisfactory during probationary period. In case of misconduct, appropriate proceedings under the rules framed from time to time.
4. Charge Report should be submitted to a I concerned.
5. Her inter-Se-seniority on lower posts will remain intact.
6. No TA / DA is allowed for joining her duty.
7. She will give an undertaking to be recorded in their Service Books to the effect that if any over payment is made to her in light of this order will be recovered and if she is promoted, she will be reversed.
8. She will give an undertaking to be recorded in her service book to the effect that if any over payment is made to her in light of this order will be recovered and if she is promoted, she will be reversed.

District Education Officer (F)  
 District Tank

Endst: No. 291-32/Promotion Dated \_\_\_\_\_ Taak \_\_\_\_\_

Copy to the:

DA/Inan Ullah/SST Adjustment Order.Docx

Dy. Director (Tatari) (Female)  
 Elementary & Secondary Education

1. Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
2. Deputy Director Establishment (Female) Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. District Accounts Officer, Tank
4. ADEO (Estab) Local Office.
5. Principal / Headmistress concerned.
6. Officer concerned.
7. Office File.

*[Signature]*  
District Education Officer (F)  
District Tank

D:\Iran Ullah\SSC Adjustment Order Docs

*[Signature]*  
Dy. Director (Female)  
Elementary and Secondary Education

P-10

**OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE), TANK.**

Working papers for Departmental Promotion Committee for the Promotion of :  
Qaria BPS-12 to Senior Qaria BPS-15.

Total No. of Qaria Posts (Duly verified from DAO) = 09

1/3 Share of Senior Qaria Posts = 03

Share of Promotion 100% =

Net to be promoted =

Proposed for promotion = 03

**LIST OF QARIA FOR THE PROMOTION QARIA -BPS-12 TO SENIOR QARIA BPS-15.**

S.No	S.L.No	Name of the official & Present Post of Posting	Date of Birth	Date of Appointment As regular Qaria	Whether Eligible for Up gradation	Remarks
1	1	Fahmida Shaheen GGHS Gul Imam	06/05/1955	22/09/1986		
2	2	Shahnaz Akhtar GGHS Mullazi	01/01/1966	26/10/1986		
3	3	Ghazala Gulfam GGHS No 1 Tank	01/02/1969	03/02/1987		
4	4	Saagufa Andaleeb GGHS Ama Khel	05/02/1980	08/12/2006		
5	5	Samina Bibi GGHS G/Shabaz	01/08/1978	19/09/2007		
6	6	Samina Bibi GGHS No 2 Tank	16/03/1996	26/02/2008		

**Certificates**

1. It is certified that all the Qaria (Female) included in the panel for the promotion of Qaria B-12 to Senior Qaria B-15
  - a) Hold the posts on regular basis and none of them is holding the post on adhoc/ctin charge basis/contract
  - b) Have completed the required minimum length of qualifying service and qualifications as required for promotion of Qaria Female B-12 to Senior Qaria B-15 under the rules.
  - c) None of them is on deputation to any organization under the Federal/Provincial/Autonomous/Semi Autonomous/ International organization.
  - d) Neither any disciplinary/departmental proceedings anti-corruption/judicial enquiry is pending against them nor has any penalty been imposed upon any one of them during the last five years.
  - e) No one is on long leave/Ex-Pakistan leave.
  - f) Their ACRs, Synopsis are free from adverse remarks.
  - g) They are all alive and serving
  - h) Their appointment orders against Qaria posts are attached herewith
  - i) The Seniority list of B-15 officers is final, undisputed and not subject to change.
2. The Departmental Promotion Committee is requested to determine the suitability of the above Qaria Promotion of Qaria B-12 to Senior Qaria B-15 with immediate effect

District Education Officer,  
(Female) Tank.



حکومت پاکستان

کمیٹی شناسی اردو

12201-1821715-8



نام:   
 پتہ:   
 قید از:   
 (Faded handwritten text)

کمیٹی شناسی اردو حکومت پاکستان  
مکمل ارشد حکیم  
02/02/1969

دستخط و مہر  
(Faded text)

دستخط و مہر

دستخط و مہر

Attested  
AM  
110





T1J9G9

قائدان نمبر:

12201-1821715-8

شناختی نمبر

موجودہ پتہ:

گج قتل والی، محلہ شیطانوہ، ٹانک

15091115560  
شناختی نمبر

مستعمل پتہ: قتل والی، شیطانوہ، ٹانک

31/03/2019

تعمیر شدہ

26/04/2010

تعمیر اجراء

گمشدہ کارڈ نمبر پر فریبی کیش میں ڈال دیا

