

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

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 11473

Dated 29/2/2024

Service Appeal No: 2294/2023

Mst. Raham Bibi, Ex-SST (BPS-16), District Shangla .....Appellant

**VERSUS**

Director E&SE Khyber Pakhtunkhwa Peshawar & other.....Respondents

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*01-04-2024*  
*swat*

*(Signature)*  
(SAMINA ALTAH)  
DIRECTOR

E&SE Department Khyber  
Pakhtunkhwa, Peshawar.

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

**Service Appeal No: 2294/2023**

**Mst. Raham Bibi, Ex-SST (BPS-16), District Shangla .....Appellant**

**VERSUS**

**Director E&SE Khyber Pakhtunkhwa Peshawar & other.....Respondents**

**JOINT PARAWISE COMMENTS ON & FOR BEHALF OF THE RESPONDENTS NO. 1, 2, 4.**

**Respectfully Sheweth :-**

The Respondents submit as under: -

**PRELIMINARY OBJECTIONS.**

- 1 That** the appellant has got no cause of action/locus standi.
- 2 That** the appellant is not an aggrieved person within the meaning of Section-4 of Khyber Pakhtunkhwa Service Tribunal Act-1974 read with Article 212 of the constitution of Islamic Republic of Pakistan, 1973
- 3 That** the instant Service Appeal is badly barred by law & limitation.
- 4 That** the appellant has concealed material facts from this Honorable Tribunal, hence liable to be dismissed on this score.
- 5 That** the appellant has filed the instant appeal on mala-fide motive.
- 6 That** the appellant has not come to this Honorable Tribunal with clean hands.
- 7 That** the appellant is not entitled for her restoration as SST (B/C) on the grounds of her low seniority against the PST post from the private Respondent No. 3.
- 8 That** the instant Service Appeal is against the prevailing law, policy & rules in vogue.
- 9 That** the instant appeal is based on mala-fide intentions just to put extra pressure on the Respondents for gaining illegal service benefits.
- 10 That** this Honorable Tribunal has got no jurisdiction to adjudicate upon the present Service appeal.

**11 That** the appeal is not maintainable in its present form & circumstances of the case as the Departmental Appeal of the appellant has been regretted vide Notification dated 31-10-2022 in view of the recommendation of the inquiry committee.

**12 That** the impugned orders/Notifications dated 26-07-2023 & 27-07-2023 is legally competent & liable to be maintained in favor of the Department.

### **ON FACTS**

- 1. That** Para-1 relates to the service record of the appellant in the Respondent Department against the PST (BPS-12) post along with his adjustment at GGPS Khadang District Tor Ghar, however, it is further submitted that as per record & inquiry report dated 01-04-2023, that Mst. Neelam of District Shangla was appointed as PST on dated 19-03-2015, whereas, the appellant Mst. Raham Bibi of District Tor Ghar was appointed on dated 19-01-2013 in the said District (Torghar), however, she has submitted an application for her inter District Transfer from District Tor Ghar to Shangla which was allowed vide order No. 8665-69 dated 26-08-2016 by the Respondent No. 2, hence, she was liable to be placed in the bottom of the seniority list of PSTs in District Shangla under the Law & Rules in vogue as evident from the Notification dated 31-10-2023 & inquiry report dated 01-04-2023 **attached as Annex A & B.**
- 2. That** Para-2 pertains to the transfer & posting of the appellant vide order dated 26-08-2016 GGPS Khadang to GGPS Gumbat Shangla upon her own application for her inter District transfer from District Tor Ghar to Shangla which was allowed on dated 26-08-2016 by the Respondent No. 2, hence, she was liable to be placed in the bottom of the seniority list of PSTs in District Shangla under the Law & Rules in vogue as evident from the said Notification & inquiry report dated 01-04-2023, hence, the plea of the appellant is mis-leading & liable to be rejected. **(Copy of the order dated 26-08-2016 Annex-C)**
- 3. That** Para-3 correct to the extent of regularization of services of the private Respondent No. 3 with reference to S.No. 16 vide Notification dated 10-03-2018 in view of the provision of Section-3 of Regularization of Services of Employees Act of 2018 notified on dated 01-01-2018 by the Govt; of Khyber Pakhtunkhwa against the PST (F) post on the grounds of being a permanent resident of District Shangla as against the appellant who was a stranger in view of her inter District Transfer as PST vide order 26-08-2016 from District Tor Ghar to Shangla, therefore, the private Respondent No. 3 is automatically stood senior from the appellant in the seniority list of 2019 of PSTs, hence, an inquiry was conducted vide Notification dated 21-03-2023 through the District Education Officer (M) Shangla in response to the appeal for promotion to the post of SST ahead of the appellant which was allowed in view of the inquiry report submitted vide letter dated 01-04-2023 with the recommendations.

Therefore, the promotion order dated 04-01-2021 may be re-called & the Respondent No. 3 be promoted to the post of SST, therefore, in compliance of the afore said letter dated 08-09-2023 **Annex-C**, the private Respondent was promoted to the post of SST by re-calling the order dated 04-01-2021 vide order dated 26-07-2023 & resultantly, the private Respondent No. 3 was promoted to the post of SST vide order dated 27-07-2023 in view of the working papers submitted by the Respondent No. 1 before the DPC **Annex-D**.

4. **That** Para-4 is correct to the extent of the Notifying of the joint seniority list of 2019 of PSTs issued by the Respondent No. 1 under the Rules, however it is further submitted that as per letter dated 30-05-2023 of the Respondent No. 1 that the promotion of the appellant is in violation of the seniority of Mst. Neelam Bibi who has filed an appeal for promotion to the post of SST (B/C) in place of the appellant on the grounds of being the permanent resident of District Shangla & senior most from the appellant also endorsed by the inquiry committee report dated 01-04-2023 in view of the Notification dated 21-03-2023 of the Respondent No. 2, hence, the claim of the appellant regarding her better seniority ahead of the Respondent No, 3 in the PST Cadre in District Shangla is illegal.
5. **That** Para-5 is correct to the extent of the promotion of the appellant to the post of SST (B/C) in BPS-16 vide Notification dated 04-01-2021 which was withdrawn vide order dated 26-07-2023 upon the Departmental Appeal of the Private Respondent No.3 resulted in the nomination of the afore cited inquiry committee who submitted inquiry report on 01-04-2023 with the recommendations **that the appellant now Respondent No. 3 in the titled appeal deserves to be mentioned in the working papers for promotion as she had 05 years plus service than Mst. Raham Bibi whose services had to be calculated minus out of District tenure which stood as 4 years at the time of DPC.** (Copies of the Notifications dated 26-07-2023 & 27-07-2023 are **Annex-E & F**).
6. **That** Para-6 is correct to the extent of filing of Departmental appeal by the Respondent No. 3 against the promotion order of the appellant as SST dated 04-01-2021 which was allowed in view of the recommendation of the inquiry report & resultantly the order dated 04-01-2021 was re-called by promoting the private Respondent No. 5 against the SST post on dated 27-07-2023 under the Rules & Policy by the Department.
7. **That** Para-7 is incorrect, the Departmental appeal of the appellant dated 31-07-2023 was considered at proper forum & has been seen & filed of being merit less in view of the fore made submissions of the Respondent Department.

8. That Pra-8 is also incorrect as the appellant is not an aggrieved person within the meaning of Section-4 of Khyber Pakhtunkhwa Service Tribunal Act-1974 read with Article 212 of the constitution of Islamic Republic of Pakistan, 1973, hence, the appeal in hand is liable to be dismissed on the following grounds inter alia: -

**ON GROUNDS**

- A. **Incorrect & not admitted**, the appellant has been treated as per Law & Rules by the Department vide Notifications dated 26-07-2023 & 27-07-2023, Therefore, the stand of the appellant is baseless & Liable to be rejected.
- B. **Incorrect & not admitted**, the appellant has been treated as per law & rules by the competent authority.
- C. **Incorrect & not admitted**, the appellant is junior to the Respondent No. 3 in view of the available record as referred above, hence, reverted to her original post of PST vide order dated 26-07-2023 by competent authority.
- D. **Incorrect & not admitted**, the act of the Department with regard to the cited Notifications is legal & liable to be maintained.
- E. **Incorrect & not admitted**, The appellant is junior to the Respondent No. 3 in view of the available record as referred above, hence, reverted to her original post of PST vide order dated 26-07-2023 by competent authority.
- F. **Incorrect & not admitted**, the appellant has got no cause of action to approach this Honorable Tribunal in the titled appeal as the act of the Department with regard to the cited Notifications is legal & liable to be maintained.
- G. **Incorrect & not admitted**, the appellant has been treated as per law & rules by the competent authority. Therefore, the stand of the appellant is baseless & liable to be rejected, however, the Respondents also seek leave of this Honorable Tribunal to submit additional grounds, case law & record at the time of arguments on the date fixed before this Honorable Bench.

**PRAYER:**

In view of the above made submissions, it is humbly prayed that this Honorable Tribunal may very graciously be pleased to dismiss the instant appeal with cost in favor of the Respondent Department by maintaining the Notifications dated 26-07-2023 & 27-07-2023 in the interest of justice.

Dated \_\_\_/ \_\_\_/2024

  
(SAMINA ALTAF)  
DIRECTOR

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

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

**Service Appeal No: 2294/2023**

**Mst. Raham Bibi, Ex-SST (BPS-16), District Shangla .....Appellant**

**VERSUS**

**Director E&SE Khyber Pakhtunkhwa Peshawar & other.....Respondents**

**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*  
(SAMINA ALTAF)  
DIRECTOR

E&SE Department Khyber  
Pakhtunkhwa, Peshawar.





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(7)

**DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION**  
**KHYBER PAKHTUNKHWA PESHAWAR.**

**NOTIFICATION**

1;- WHEREAS, vide Notification Endst;NO;8924-25 dated 26-2-2023 the promotion order PST to SST B/C in respect of ,Mst;Raham Bibi SST B/C is withdrawn under the provision of section 26 of General clauses Act;1987 amended in 1956 on account of submission of appeal by Neelam Bibi PST

2. AND WHEREAS, Mst;Raham Bibi was transferred from District Tor Ghar to District Shangla On 28-8-2016

1. AND WHEREAS, Mst;Neelam Bibi PST GGPS Jabbar District Shangl has filed an appeal regarding her seniority for promotion as SST B/C in B-16 ahead of Mst;Raham Bibi on dated 23-12-2022

2: AND WHEREAS, This office initiated an inquiry vide notification NOI;288-90 dated 21-3-2023 through the DEO(M) Shangla,the Inquiry office submitted the inquiry report vide his NC:3901 dated 1-4-2023 with the remarks that the applicant was negelected and not mentioned in the working papers and the appellatn deserves to be mentioned in the working papers for promotion as she had five years plus service than Mst;Raham Bibi whose service had to be calculated minus out of district tenure which stood as four years plus at the time of DPC

3. AND WHEREAS the name of the teacher transferred from one district cadre post to other district cadre post on her own request will be place at the bottem of the seniority list i.e according to the date of taking over charge after the date of issue of her inter district transfer order

4. AND WHEREAS in view of the avbove facts and circumstances of the case alongwith perusal of inquiry report of DEO (M) Shangla, request of the DEO(F) Shangla and departmental appeal of Mst;Neelam Bibi PST was probed and considered as per rules/policy

5. AND WHEREAS, this Directorate constitute the committee to discussed/decied the appeal of Mst;Raham Bibi vide Notification NO:1845-47 dated 22-9-2023 ,and called DEO(F), Shangla and both the teachers on 3-10-2023 at 10 AM for personal hearing

NOW THEREFORE,After threadbare discussion on the matter the committee decided that the appeal of Mst;Raham Bibi is null and void and hence,regretted

DIRECTOR

Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar.

Endst;No: 3628-30 /F.No.379/appeal Tor Ghar Dated Pesh: the 31/10/23

Copy forwarded for information to the:-

1. District Education Officer (Female) Shangla is directed to probe into the matter through inquiry & submit clear cut recommendation with in 15 days against the officer/officials who submitted wrong working papers regarding the promotion case of Raham Bibi PST
- 2.
3. PA, to Director Elementary & Secondary Education, Local Directorate, Peshawar.

Assistant Director (Estab-1)  
Directorate of Elementary & Secondary Education

31/10/23.

Attested  
[Signature]



97/ (8)

**INQUIRY REGARDING PROMOTION TO SST (BIO/CHEM) IN R/O  
MST. NEELAM PST GPS JABBAR DISTRICT SHANGLA**

**I. Introduction:**

Reference to the subject cited above, the undersigned was assigned to conduct inquiry vide Directorate E&SE KP Notification Endst; No.288-90/F.No.7 / Vol-1/F/Appeal/Promotion dated Pesh. The 21-03-2023 in light of the letter of DEO (F) Shangla No.651/Appeal/SSTs/Promotion/DEO/F/SH dated 09-03-2023, to probe into the matter and submit detail inquiry report along with clearcut findings and recommendations for further necessary action.

**II. Procedure Adopted:**

1. The undersigned intimated the DEO (F) Shangla vide a letter bearing Endst. No.3552/Inquiry/ File/ PA Dated 27-03-2023 for provision of requisite documents mentioned in the letter from S.No.1 to 17 along with presence of all the stake holders on 01-04-2023 to facilitate in the subject inquiry. (Copy is attached as Annexure "A").
2. The DEO (F) was further intimated vide letter No.3806/Inquiry/File/PA Dated 31-03-2023 for two other necessary documents to be presented on 01-04-2023 during the conduct of inquiry. (Copy is attached as Annexure "B").
3. The undersigned visited the office of DEO(F) on the appointed date i.e 01-04-2023 (11:00 AM) to conduct the subject inquiry.

**III. Findings:**

1. That the available data and information already mentioned in the letter of DEO(F) Shangla No.651 dated 09-03-2023 shows that the appellant Mst. Neelam PST GPS Jabar was appointed on 19-03-2015 (Appointment Letter is attached as Annexure "C") and Mst. Raham Bibi was appointed on 19-01-2013 at District Tor Ghar (Appointment Letter is attached Annexure "D") and was transferred from District Tor Ghar to District Shangla vide office order No.8665-69 dated 26-08-2016 by Directorate of E&SE KP. (Copy of transfer order is annexed as Annexure "E").

Attested,  
*[Signature]*

- 92/
- 91
2. That at the time of DPC held in 2020 and promotion notification No.8899-8905 dated 04-01-2021 Mst. Raham Bibi was promoted to SST (Bio/Chem) but the appellant was neglected and not mentioned in the working papers. (Copy of working Paper and Minutes of the DPC are Annexed as Annexures "F-1 & F-2")
  3. That as per APT Rules 1989 part-II Rule 8 sub-Rule (2) clearly shows as "*A person so transferred shall be placed at the bottom of the cadre strength which he joins for the purpose of determining his seniority vis-à-vis other members born on the cadre*". (Copy attached as Annexure "G"). Therefore, the appellant deserves to be mentioned in the working papers for promotion as she had five years plus service than Mst. Raham Bibi whose service had to be calculated minus out of district tenure which stood as four years plus at the time of DPC.
  4. That a guidance letter No.2296 dated 31-08-2012 being addressed to Executive District Officer (Education) Peshawar copy endorsed to all the EDOs KP by the Deputy Director (Establishment) , E&SE KP Peshawar vide Point No.2 Which clearly states as "*the name of the teacher transferred from one district cadre post to other district cadre post on his own request will be place at the bottom of the seniority list i.e according to the date of taking over charge after the date of issue of his inter-district transfer order.*" (copy of the guidance letter is attached as Annexure "H")
  5. That during the course of official visit of the under signed to the office of DEO (F) Shangla on 01-04-2023 already intimated vide letter No.3552 dated 27-03-2023 which was received by the DEO(F) Office vide diary No.858 dated 27-03-2023 and marked to ADEO (Primary/ Secondary) on the same date was neglected to be honored. (Copy is attached as Annexure "A"). The intimation letter being served on 27-03-2023 and received and marked to the stake holders on the same date was not responded with solid record. The concerned dealing assistants were unable to provide the requisite documents/ record for facilitation in proper manner. The DA concerned contended that the same was already sent on their Whatsapp No. of Ex. ADEO (Estb; Secy) Mr. Said Ali and the current ADEO (Estb; Pry) Mr. Muhammad Alam but both did not bother to ensure their presence without any intimation.

Attested.  
[Signature]

9/11

**Conclusion:**

In the light of the above facts and findings the lapses on part of DEO(F) office cannot be ruled out. Under the APT Rules 1989 Part II Rule 8 & Sub Rule (2), and guidance from Directorate E&SE KP, as well as clearly mentioned in transfer order referred above Neelam is senior to Mst. Rahan Bibi. Therefore, the right of the appellant seems to be abrogated if she was reflected in the working paper for the consideration for promotion to the Directorate E&SE under APT Rules 1989 Part- II Rule (9) sub-Rule (1) on Acting Charge Basis then this episode might not have occurred.

**V. Recommendations**

The contention of the teacher concerned is worth considerable and can be substantiated with materials facts. All the stake holders were absent on the day of visit in spite of intimation. They maybe called to Directorate E&SE KP Peshawar in person along with relevant record to justify the negligence and inefficiency to their duty.

*Muzafar Ali Khan*  
87/29/23

Muzafar Ali Khan  
District Education Officer (M)  
District Shangla

Dated 01 / 04 2023

*Attested.*  
*[Signature]*

11

Tor Ghar Transfer order

Annexure  
"A",  
11

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

**OFFICE ORDER.**

Mst. Raham Bibi PST GGPS Khadang Akazai Torghar is hereby transferred/adjusted against the vacant post of PST at GGPS Gumbat Shangla on her own pay & BPS in the interest of public service with immediate effect

- Note:-
1. The teacher concerned has conditionally transferred <sup>and</sup> ~~but~~ the DEO(F) Torghar will relieved her when the new recruitment process completed.
  2. Charge report should be submitted to all concerned.
  3. No TA/DA etc are allowed.
  4. The DEOs (F) concerned are directed to check her original service documents before making payment of her salary.
  5. Her seniority will be determined at the bottom of the seniority list of PST(B-12) as per rules

Director

Elementary & Secondary  
Education Khyber Pakhtunkhwa

Endst: No. 0665-69 /F.No.82/(F)/G. Transfer dated Peshawar the 26/8/16 2016

Copy for information to the:-

1. District Education Officer (Female) Torghar & Shangla
2. District Account Office Torghar & Shangla
3. Headmistress concerned.
4. Teacher concerned.
5. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa.
6. M/File.

Attested  
Ejaz

[Signature]  
26/8/16  
Deputy Director (Female)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa,

M.Zahir

**ATTESTED TO BE  
TRUE COPY**

[Signature]



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



12

Phone: 0996-850686

Email deofshangla@gmail.com

No 3128 /Appeal/ Promotion/Raham Bibi  
To

Dated 8 / 9 2023.

The Director,  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar.

*Handwritten initials*

Subject: **DEPARTMENTAL APPEAL REGARDING RE-INSTATEMENT AS SST-2**  
Memo:

Kindly refer to your letter No.3474/F. No/Vol-I/F/appeal/Promotion dated Peshawar 29/08/2023.

In this regard, it is submitted for your kind information that the Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar has promoted Mst: Raham Bibi PST GGPS <sup>Gumbat</sup> ~~Jabar~~ to the post of SST (Bio/Chem).vide Notification No.8899-8905 dated 04/01/2021 and further adjusted at GGHS Sanila Puran vide this office Order Endst No. 2380-89 dated 08/02/2021, (copies attached) Annex "AB".

Later on in light of the appeal, submitted by Mst: Neelam Bibi PST GGPS Jabar to the Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar for promotion and honored, which was accepted and the said teacher was promoted as SST (Bio/Chem) while Mst: Rahama Bibi Ex-SST (Bio/Chem) GGHS Sanila has been demoted vide Directorate Notification Endst No. 8924-26/F. No.332 dated 26/07/2023. Copy attached) Annex "C".

As per your kind directives in the aforementioned letter, Seniority list, regularization Order and other relevant documents (Annex "D") attached, as desired please

*D.A. Sach*  
*Handwritten signature*  
*12/8/2023*

*Handwritten signature*  
**DISTRICT EDUCATION OFFICER (F)**  
**DISTRICT SHANGLA**

*Attested*  
*Handwritten signature*

Neelam Appeal

Annexus  
"E"  
29



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA PESHAWAR

NOTIFICATION

WHEREAS, vide Notification Endst: No. 8899-8905/A-17/DPC-2019/KPK dated 1-1-2021, the Departmental Promotion Committee (DPC) decided to promote PST, SPST, and PSHT to the post of SSTs in BPS-16 on the basis of their respective seniority-cum-fitness in its meetings held on 30-9-2020 under the reserved quota of 20 % including one Mst:Raham Bibi PST at GGPS Guibat Makhozai District Shangla as SST B/C in B-16 after due process of law and policy. Vide order dated 04-01-2021.

1. AND WHEREAS, aggrieved from the notification of even and dated 1.1.2021 to the extent of promotion of Mst:Raham Bibi. One Mst:Neelam Bibi PST GGPS Jabar of District Shangla has filed an appeal regarding her seniority for promotion as SST B/C in BPS-16 ahead of Mst: Raham Bibi to this Directorate on dated 23.12.2022.

2. AND WHEREAS, this office initiated an inquiry vide Notification No.288-90 dated 21-03-2023 through the DEO (M) Shangla. The inquiry officer submitted the inquiry report vide his office No. 3901 dated: 01-04-2023 and recommended the appellant namely Mst:Neelam Bibi PST with the recommendation of being senior to Mst:Raham Bibi PST.

3. AND WHEREAS, in view of the said inquiry report dated: 01-04-2023, the DEO (F) Shangla has submitted the reply on dated 30.5.2023, along with final seniority list, revised working papers with the request that Mst:Raham Bibi SST (B/C) GGHS Sanila may please be demoted to her previous post of PST, according to the Seniority list and the appellant, Mst:Neelam Bibi may please be promoted to the post of SST B/C for smooth resolution of the said issue and consideration of her right in the best interest of public service.

Now therefore, in view of the above made facts and circumstances of the case alongwith perusal of the inquiry report of DEO(Male)Shangla, request of the DEO(F) Shangla and powers, conferred upon the undersigned being Competent Authority, the promotion order under Endst;No. 8899-8905 dated: 04-1-2021 occurring at Sr.No:1 in item NO:1 in respect of Mst:Raham Bibi is hereby withdrawn under the provision of section-20 of General clauses Act:1897 amended in 1956, with immediate effect & Mst:Neelam Bibi PST GGPS Jabbar is promoted to SST (B/C) in B-16 (Rs.28070-2260-95870) respectively usual allowance as admissible under the rules on regular basis under the existing policy of the provincial Government on the terms & conditions mentioned below, further the services of Mst: Neelam Bibi are hereby placed at the disposal of DEO(F) Shangla for further adjustment in the interest of public service with immediate effect with the following Terms and Conditions.

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 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. She 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 of this order will be recovered and if he/she is wrongly promoted she will be reversed/demoted.
8. Before handing over charge once again their document may be checked if they have not the required relevant qualifications as per rules, she may not be handed over charge of the post.
9. Any errors/omission is accepted.

Director  
Elementary & Secondary  
Education Khyber Pakhtunkhwa.

Endst:No .8924-25 F.No.332/ Dated -26-07-2023.  
Copy forwarded for information to the:-

1. District Education Officer (Female) Shangla
2. District Account officer Shangla
3. P/A to Secretary to Govt:Khyber Pakhtunkhwa E&SED Department.
4. Section Officer (F/P) Govt:Khyber Pakhtunkhwa E&SED Department.
5. Official Concerned.

Deputy Director (Female)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

ATTESTED TO BE  
TRUE COPY

Attested  
D. Jomay

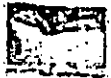
14

Neelum promotion order

30



OFFICE OF THE  
DISTRICT EDUCATION OFFICER (F)  
SHANGLA



Phone: 0996-850686

Email: deofshangla@gmail.com

**OFFICE ORDER ADJUSTMENT**

In pursuance of the Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar Notification Endst: No. 8924-25/P.No.332 dated 26/07/2023, Mst. Neelum Bibi (PST) BPS-12 GGPS Jibar is hereby promoted to the post of SST (Bio/Chem) In BPS-16 (Rs. 28070-2260-95870) plus usual allowances as admissible under the rules and service placed at the disposal DZO (F) Office Shingla for adjustment is hereby adjusted against the vacant posts of SST (Bio/Chem) at GGHS Sunila Puran District Shingla in the best interest of public service with effect from date of taking over charge with the following term and condition:

**TERMS AND CONDITION**

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 government.
3. Her services can be terminated at any time, in case her performance is found unsatisfactory during probationary period. In case of misconduct, she will be proceeded under the rules framed from time to time.
4. Charge reports should be submitted to all concerned.
5. Her inter-se-seniority on lower post will be remain intact.
6. No TA/DA is allowed for joining her duties.
7. She will be given an under taking to be recorded in her service books to the effect that if any over payment is made to her in the light of this order will be recovered and if any one of them is wrongly promoted, she will be reversed/demoted.
8. Before handing over charge once again her documents may be checked if they have not the required relevant qualification as per rules, she may be not be handed over charge of the post.
9. Any Error and omission will be accepted.

(PARVEEN RAHMAN)  
DISTRICT EDUCATION OFFICER (F)  
SHANGLA

Endst: No. 267187 /P/Neelum Bibi PST /Appeal/2022-23 Dated 27 /07/2023.

Copy of the above is forwarded to:-

1. The Director, Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar.
2. The Deputy Commissioner Shingla.
3. The District Accounts Officer Shingla.
4. The District Monitoring Officer, EMA Shingla.
5. The B&AO/ Local Accounts Branch.
6. The SDEO (F) Alpurai for information.
7. The Head Mistresses/Incharge of the concerned Schools for necessary action at her end.
8. The Teacher Concerned.
9. Office File.

Attended  
S. Jinnah

ATTESTED TO BE  
TRUE COPY

DISTRICT EDUCATION OFFICER (F)  
SHANGLA

*Domotion order*

31



OFFICE OF THE  
DISTRICT EDUCATION OFFICER (F)  
SHANGLA

Phone: 0996-850686

Email: [deofshangla@pkschools.gov.pk](mailto:deofshangla@pkschools.gov.pk)

**OFFICE ORDER**

In pursuance and compliance of the order of the Director Elementary and Secondary Education Khyber Pakhtunkhwa No. 8924-25/F No 332 dated 20/07/2021, Ms. *[Name]* promoted to the post of SS I - B (Chem. Vids) No. *[No.]* dated 04/01/2021 is hereby demoted to her previous grade (SS I - B) Transfer from Torghar to District Shangla Dated 26/07/2024, with effect from the bottom as per rules) in the best interest of public service with immediate effect.

- Notes:-
1. Necessary Entry in this effect should be made in her service book
  2. Her pay shall be fixed in PST post BPS-12.

(PARVEEN FAHIM)  
DISTRICT EDUCATION OFFICER  
SHANGLA

Dated 27.07.2024

Encl: No. 2568-78,  
Copy of the above is forwarded to:-

1. The Director, Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar & Dated cited above.
2. The Deputy, Commissioner Shangla.
3. The District, Accounts Officer Shangla.
4. The District Monitoring Officer, EMA Shangla.
5. The B&AO/ Local Accounts Branch
6. The SDEO (F) Purna for further necessary action at her end.
7. The Head Mistresses of the concerned Schools
8. The Teacher Concerned
9. Office File.

*[Signature]*  
DISTRICT EDUCATION OFFICER (F)  
SHANGLA

ATTESTED TO BE  
TRUE COPY

*[Signature]*



Better Copy of page No. 31  
OFFICE OF THE  
DISTRICT EDUCATION OFFICER (F)  
SHANGLA

**OFFICER ORDER**

In pursuance and compliances of the enquiry report and the ..... the Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar ..... No. 8924-25/ F.No.332 dated 26-07-2023. Mst. Rahim Bibi PST GGPS Gumbat Chagum ..... promoted to the post of SST (Bio/Chem) vide Notification Endst. No. .... dated 04-01-2021 is hereby demoted to her pervious original post i.e. IST BPS-12 due to her ..... Transfer from Torghar to District Shangla dated 26.08.2016 which her seniority was ..... the bottom as per rules) in the best interest of public service with immediate effect.

- Note: 1. Necessary Entry to this effect should be made in her service book  
2. Her pay shall be fixed in PST post BPS-12.

(Parveen Reman)  
District Education officer (F)  
Shangla

Dated 27-07-2023

Endst NO. 2668-78

Copy of the above is forwarded to

1. The Director Elementary and secondary education Khyber Pakhtunkhwa Peshawar & dated cited above
2. The Deputy Commissioner Shangla
3. The District accounts officer Shangla
4. The District Monitoring officer, EMA Shangla
5. The B\*AO/local accounts branch
6. The SDEO (F) Puran for further necessary action at her end
7. The Head mistresses of the concerned schools
8. The Teacher Concerned.
9. Office file

Sd/  
DISTRICT EDUCATION OFFICER (F)  
SHANGLA

*Attested*  
*Purman*



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

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**AUTHORITY LETTER**

I, 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. 2294/2023 case titled Mst. Raham Bibi, SST District Shangla Vs Government of Khyber Pakhtunkhwa & others** fixed for hearing on \_\_\_/\_\_\_/2024, hence, an authority letter is hereby issued in favor of the above-named officer.

  
(SAMINA ALTAF)  
DIRECTOR

E&SE Department Khyber  
Pakhtunkhwa, Peshawar.