

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
PESHAWAR.

Service Appeal No. 857/2016

Date of Institution... 24.08.2016

Date of decision... 07.07.2017

Mst. Nasira Batool W/O Isa Muhammad  
R/o Mohallah Mughalanda Tehsil & District, Chitral.

... (Appellant)

Versus

1. Govt. of KPK through Secretary Elementary & Secondary Education, Peshawar.
2. Alia Faizi D/o Inayatullah Faizi, Village Balilm, Tehsil Masty District Chitral C/o Headmistress GGHS Danen Chitral.
3. District Education Officer.(Female) District Chitral.
4. Director Elementary & Secondary Education KPK, Peshawar.

.... (Respondents)

MR. KAMRAN QAISAR,  
Advocate

... For appellant.

MR. MUHAMMAD JAN,  
Deputy District Attorney

... For official respondents No. 1,3&4.

MR. SYED GHUFRAN ULLAH SHAH,  
Advocate

... For private respondent No. 2.

MR. GUL ZEB KHAN,

... MEMBER (EXECUTIVE)

MR. MUHAMMAD HAMID MUGHAL,

... MEMBER (JUDICIAL)

JUDGMENT

GUL ZEB KHAN, MEMBER:- The appellant Nasira Batool W/o Isa Muhammad, through the instant appeal under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 has impugned the Notification dated 17.03.2016 vide which the appellant was transferred from GGHS Danen Chitral to GGHS Awi Chitral against the post of Headmistress. Against the impugned Notification dated

17.03.2016, appellant filed a departmental appeal on 17.05.2016 but the same was not responded within the statutory period of 90 days.

2. Facts of the present appeal are that the appellant was initially inducted in Education Department as SET (BPS-16) at GGMS Kuju Chitral. She was promoted as Headmistress (BPS-17) on regular basis and transferred/posted as Headmistress at GGHS Danen against the vacant post vide Notification dated 17.03.2016. The appellant assumed the charge of the post of Headmistress at GGHS Danen on the same date i.e 17.03.2016. Later the Respondent No. 1 issued a corrigendum after two months on 16.05.2016 wherein the appellant was transferred from GGHS Danen Chitral to GGHS Awi Chitral against the vacant post. That feeling aggrieved from the impugned Notification dated 17.03.2016 the appellant filed a departmental appeal on 17.05.2016 which was not responded within statutory period of 90 days, hence, the instant service appeal.

3. The learned counsel for the appellant argued that the impugned Notification dated 17.03.2016 was against the law and liable to be set-aside because transfer of the appellant was premature as the appellant has worked only for two months as Headmistress at GGHS Danen Chitral. He further argued that transfer of the appellant was also made on political pressure and on this score too the impugned transfer notification dated 17.03.2016 need to be struck down. He further argued that in light of directives and policy of the Government the appellant could not be transferred firstly due to the reason of completion of her normal tenure and secondly due to spouse policy. By issuing the impugned order, the Respondent Department has violated the policy regarding posting of husband & wife at one station or at the nearest possible station. Learned counsel for the appellant further argued that private respondent No. 2, has been favoured with a posting of her choice against the rules and instructions at the cost of the appellant. He further argued that private respondent No. 2 namely Attia Faizi was Subject Specialist and according to Instructions/Job Manual

of Subject Specialist, the Subject Specialist cannot be posted as Head Mistress. He prayed that on acceptance of this appeal the impugned Notification dated 17.03.2016 may be set-aside and the appellant may be allowed to perform her duty as Headmistress at GGMS Danen Chitral.

4. On the other hand, learned Deputy District Attorney for official respondents No. 1, 3 & 4 argued that vide Notification dated 17.03.2016 the appellant was promoted as Headmistress (BPS-17) and was wrongly posted at GGHS Danen as there was no vacant post hence, vide corrigendum dated 16.05.2016 the appellant was rightly posted at GGHS Awi Booni District Chitral i.e against the vacant post. He further argued that the appellant was transferred vide corrigendum dated 16.05.2016 and the appellant has not challenged the said corrigendum therefore, the present service appeal of the appellant is also not maintainable. He further argued that the no departmental appeal has been filed by the appellant which was mandatory requirement for filing of service appeal before the Khyber Pakhtunkhwa Service Tribunal under Section-4 of the Act 1974. He also stated at the bar that the departmental appeal annexed by the appellant with appeal was fake/bogus and fabricated hence, the present appeal of the appellant is not maintainable. He further argued that the post of Headmistress is a Provincial Teaching Cadre post and the appellant is liable to serve anywhere in the province in view of Section-10 of the Government Khyber Pakhtunkhwa Civil Servants Act, 1973 and prayed for dismissal of appeal.

5. Counsel for private respondent no. 2 also relied on the arguments advanced by the learned Deputy District Attorney.

6. We have heard the arguments of learned counsel for the appellant and learned Deputy District Attorney for official respondents no. 1, 3 & 4 as well as learned counsel for private respondent no. 2 and have gone through the record available on file.

7. Perusal of the record reveals that the appellant was initially inducted in Education Department as SET (BPS-16) at GGMS Kuju Chitral and vide Notification dated 17.03.2016 the appellant was promoted as Headmistress (BPS-17) on regular basis and was posted as Headmistress at GGHS Danen. That respondent No. 1 issued a corrigendum on 16.05.2016 wherein the Notification dated 17.03.2016 was modified and the appellant was transferred from GGHS Danen Chitral to GGHS Awi Chitral against the vacant post.

8. There is no one denying the facts that post of Headmistress at GGHS Danen was already occupied by respondent No. 2 when the transfer/posting order dated 17.03.2016 mentioned above was issued hence, corrigendum is logical one.

9. As regards plea of the appellant regarding spouse policy, it is observed that the post of Headmistress (BPS-17) is neither a Union Council Cadre post nor a District Cadre post. The post of Headmistress is a Provincial Teaching Cadre post and it is the prerogative of the Government to transfer a civil servant to a place where his/her services are mostly required and no civil servant is permitted to work at his/her own choice of station. The appellant is liable to serve anywhere in the province as already mentioned in Section-10 of the Khyber Pakhtunkhwa Civil Servants Act, 1973.

10. In view of the foregoing, this Tribunal holds that the appellant has failed to make out any cogent reasons justifying the Tribunal interference in the matter. The appeal in hand is accordingly dismissed with no order as to costs. File be consigned to the record room.

ANNOUNCED  
07.07.2017

  
(MUHAMMAD HAMID MUGHAL)  
MEMBER

  
(GUL ZEB KHAN)  
MEMBER

10.05.2017

Clerk to counsel for the appellant and Mr. Hameed ur Rehman, AD (Litigation) alongwith Mr. Usman Ghani, Sr. GP for respondents present. Due to transfer of one of the undersigned as reported in daily "Aaj" dated 10.05.2017, arguments could not be heard. To come up for final hearing on 06.07.2017 before the D.B. Status quo be maintained.

Member

Chairman

08. 06.07.2017 Counsel for the appellant present and Mr. Muhammad Jan, Deputy District Attorney for the respondent present. Arguments heard. To come up for final order on 07.07.2017 before D.B.

(Gul Zeb Khan)  
Member

(Muhammad Hamid Mughal)  
Member

07.07.2017

Counsel the appellant present. Mr. Muhammad Jan, Deputy District Attorney for the respondents present. Arguments heard and record perused.

Vide our separate judgment of today of this Tribunal placed on file. The appeal in hand is dismissed with no order as to costs. File be consigned to the record room.

ANNOUNCED  
07.07.2017

(MUHAMMAD HAMID MUGHAL)  
MEMBER.

(GUL ZEB KHAN)  
MEMBER.

857/2016

10.02.2017

Counsel for appellant and Mr. Hameed-ur-Rehman AD (Litigation) alongwith Mr. Muhammad Adeel Butt, Additional AG for official respondents No. 1, 3 and 4 present. Rejoinder not submitted. Learned counsel for appellant seeks adjournment. Adjourned. To come up for rejoinder and arguments on 03.03.2017 before D.B. Status-quo be maintained.

  
(ASHFAQUE TAJ)  
MEMBER

  
(MUHAMMAD AAMIR NAZIR)  
MEMBER

03.03.2017

Clerk to counsel for the appellant and Mr. Ziaullah, GP for respondents present. Rejoinder submitted which is placed on file. To come up for arguments on 10.04.2017 before D.B. Status-quo be maintained.

  
(AHMAD HASSAN)  
MEMBER

  
(MUHAMMAD AAMIR NAZIR)  
MEMBER

10.04.2017

Counsel for the appellant present. Mr. Ziaullah, Government Pleader for official respondents No. 1, 3 & 4 and private respondent No. 2 with his counsel also present. Both the counsel for appellant and private respondent requested for adjournment. Adjourned. To come up for arguments on 10.05.2017 before D.B. Status-quo be maintained till date.

  
(Ahmad Hassan)  
Member

  
(Muhammad Amin Khan Kundi)  
Member

857/16

14.12.2016

Clerk of counsel for the appellant, Mr. Hameedur Rahman, AD alongwith Addl. AG for the official respondents and counsel for private respondent No. 2 present. Written replies by official respondents as well as private respondent submitted. The appeal is assigned to D.B for rejoinder and final hearing as well as arguments on stay application for 12.01.2017. Status quo be maintained.

  
Chairman

12.01.2017

Counsel for the appellant and Mr. Hameed ur Rehman, AD (Litigation) alongwith Mr. Ziaullah, GP for respondents present. Learned counsel for the appellant seeks adjournment. Status-quo order should be implemented in letter & spirit no violation should be made till date fixed. Learned counsel for the appellant is directed to submit rejoinder positively on the next date to argue the case. To come up for rejoinder and arguments on 10.02.2017. Status-quo be maintained.

  
(AHMAD HASSAN)  
MEMBER

  
(MUHAMMAD AAMIR NAZIR)  
MEMBER

Appeal No. 857/2016  
Ms. Nasira Batool vs Govt.

17.10.2016

Learned counsel for the appellant argued that the appellant was promoted from the post of SST to the post of Head Mistress (BPS-17) and posted as Head Mistress GGCMHS Danen Chitral vide notification dated 17.03.2016 where her name was reflecting at serial No. 85. The appellant assumed the charge of the post on the same date but after two months through a corrigendum order dated 16.05.2016 she was posted out from the said school and transferred to GGHS Awi Sub Division Mastooj Chitral. He further argued that no replacement against the said post was provided in the said order adding further that the transfer order was illegal, void ab-initio as appellant was not allowed the prescribed tenure at the said station. He further argued that the said transfer order was against the spouse policy as husband of the appellant was head Master and still working at GHS Danen and the instant appeal may be admitting for regular hearing.

The record reveals that impugned order does not reflect the name of private respondent Alia Faizi correct name is (Atia Faizi) and according to the counsel for the appellant the post of head Mistress at GGHS Danen was still vacant. Record also reveal that private respondent was Subject Specialist as that was no sectional post of Subject Specialist in the said school and orders of displacement of the appellant was aimed at retaining the private respondent on the post of Head Mistress at GGHS Danen therefore, the order was based on mala-fide.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 14.12.2016 before S.B. Meanwhile status-quo be maintained.

Appellant Deposited  
Security & Process Fee

Member

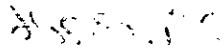


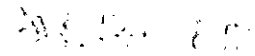
26.09.2016

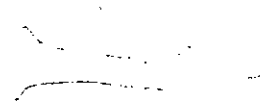
Counsel for the appellant present. Preliminary arguments partly heard. Since the matter required further elucidation, therefore, pre-admission notice be issued to the learned AAG. To come up for further preliminary hearing on 17.10.2016.

  
Member





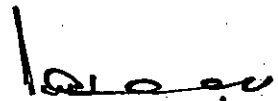






Form- A  
FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No. 857/2016

S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	24/08/2016	<p style="text-align: center;">The appeal of Mst. Nasira Batool resubmitted today by Mr. Kamran Qaiser Advocate may be entered in the Institution Register and put up to Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2	25-08-2016	<p style="text-align: center;">This case is entrusted to S. Bench for preliminary hearing to be put up there on. <u>29.08.2016</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
	29.08.2016	<p style="text-align: center;">Clerk of counsel for the appellant present. Seeks adjournment as counsel for the appellant is not in attendance. Adjourned for preliminary hearing to 26.09.2016 before S.B.</p> <p style="text-align: right;"> CHAIRMAN</p>


This is an appeal filed by Mst. Nasira Batool today on 02/08/2016 against the order dated 16.05.2016 against which she preferred/made departmental appeal/ representation on 17.05.2016 the period of ninety days is not yet lapsed as per section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974, which is premature as laid down in an authority reported as 2005-SCMR-890.

As such the instant appeal is returned in original to the appellant/counsel. The appellant would be at liberty to resubmit fresh appeal after maturity of cause of action and also removing the following deficiencies.

- 1- Memorandum of appeal may be got signed by the appellant
- 2- Address of respondent No.2 is incomplete which may be completed according to Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 3- Page- 14, 15, 19, 27, 28 and 36 of the appeal are illegible which may be replaced by legible/better one.
- 4- Annexures of the appeal may be attested.

No. 1245 /ST,

DI. 4/8/2016

  
REGISTRAR -  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Kamran Qaisar Adv. Pesh.

Sir,  
All the objections have  
been rectified & corrected  
Please put before Court  
18/8/16  
Bar. Kamran Qaisar

**BEFORE THE CHAIRMAN SERVICE TRIBUNAL PESHAWAR**

Appeal no. 857/16

Mst. Nasira Batool.....Petitioner

**VERSUS**


Govt of KPK through its Secretary Elementary and Secondary Education Peshawar and others.....Respondents

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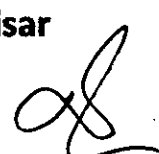
S.No	Description of Documents	Annex	Pages
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Petitioner

Through

  
Barrister Kamran Qaisar  
Advocate, High Court  
Peshawar

Date: 01/08/2016

  
Amir Ali Khan  
Advocate, Peshawar

**BEFORE THE CHAIRMAN SERVICE TRIBUNAL, PESHAWAR**

*Appeal No. 857/16*

Mst. Nasira Batool W/o Isa Muhammad

R/o Mohallah Mughalanda Tehsil & District, Chitral

Khyber Pakhtukhwa  
Service Tribunal

Diary No. 790

Dated 2/8/2016

.....Petitioner

Versus

1. Govt. of KPK through its Secretary Elementary and Secondary Education, Peshawar.
2. Alia Faizi D/o Inayatullah Faizi Village Balilm Tehsil Masty District Chitral C/o Head Mistress GGHS Danen Chitral.
3. District Education Officer (Female) District Chitral.
4. Director Elementary and Secondary Education KPK, Peshawar.

..... Respondents

**SERVICE APPEAL U/S 4 OF THE SERVICE TRIBUNAL ACT, 1974 AGAINST THE ORDER OF RESPONDENT NO.1 DATED 17.03.2016 WHEREBY HE/SHE HAS TRANSFERRED THE APPELLANT TO GGHS AWI BOONI CHITRAL FROM DANEN CHITRAL OF GGHS CHITRAL VERBAL ORDER DATED 17.03.2016 WHEREBY THE DEPARTMENTAL APPEAL FILED BY THE APPELLANT WAS REJECTED.**

*Filed to-day*

*Waseem*  
Registrar  
*2/8/16*

Prayer:

*By accepting this appeal the impugned order of respondent No.1, may please be set aside and the appellant may be allowed to perform her duty as head mistress GGMS Danen Chitral.*

Re-submitted to -day  
and filed.

*Waseem*  
Registrar

*24/8/16*

**Respectfully Sheweth**

1. That the appellant was initially inducted in the Education Department was performing her duty at GGMS Kujra Chitral as SET (BPS-16) with zeal and Zeist.
2. That vide notification No. SO (PE) 2-4/DPC dated 17.03.2016 the appellant was promoted as head Mistress BPS-17 (Regular) and was posted as head mistress at GGCMS danin Chitral.

**(Copy of promotion orders dated 17.03.2016 is Annexure "A")**

It may be mentioned here that after promotion the post of headmistress GGCMS Danin Chitral was lying vacant as is evidence from vacancy certificate issued by DEO (F) Chitral.

**(Copy of the certificate is attached as Annexure "B").**

It may further be mentioned here that in the promotion order of the appellant dated 17.03.2016 as well as the certificate issued by DEO (F) Chitral the post of headmistress in GGCMS Danin Chitral was shown as vacant but in really respondent No.2 was occupied it wrongly being a subject specialist. (Chemistry) as is evident from her posting order dated 24.01.2014.

**(Copy of notification No.SO (S) (F) (E&S) /4-16/2014/Atia Faizi SS dated 24.01.2014 is annexure "C").**

3. That the Appellant after promotion assumed the charge of head mistress Danin Chitral in the afternoon on the same

Respectfully yours,

1. That the appellant was initially inducted in the Education Department was performing her duty at GMS Kufra : Critical as SET (BP2-18) with zeal and zest.

2. That vide notification No. 20 (F) 2-4/DPC dated 17.03.2018 the appellant was promoted as head mistress BP2-17 (Regular) and was posted as head mistress at GCMs Daini Chital. (Copy of promotion orders dated 17.03.2018 is Annexure "A")

It may be mentioned here that after promotion the post of headmistress GCMs Daini Chital was lying vacant as is evidence from vacancy certificate issued by DEO (F) Chital. (Copy of the certificate is attached as Annexure "B").

It may further be mentioned here that in the promotion order of the appellant dated 17.03.2018 as well as the certificate issued by DEO (F) Chital the post of headmistress in GCMs Daini Chital was shown as vacant but in reply respondent No.2 was occupied wrongly being a subject specialist (Chemistry) as is evident from her posting order dated 24.01.2014. (Copy of notification No.20 (F) (ES2) 14-18/2014 dated 24.01.2014 is annexure "C").

3. That the Appellant after promotion assumed the charge of head mistress Daini Chital in the afternoon on the same

date i.e.17.03.2016 and started discharging her duties efficiency.

**(Copy of Charge assumption is Annexure "D").**

It may be noted with advantage that the appellant was also drawing/receiving the monthly salary being the Headmistress of GGCMS Danin Chitral as is evident from her any slip.

**(Copy of pay slip attached herewith as Annexure "E").**

4. That the appellant was performing her duties when astonishing and all of sudden just after two months on 16.05.2016 respondent No 1 issued a corrigendum where in the appellant was shown at S.No.4 and was transferred to GGHS AWI Chitral

**(Copy of the impugned corrigendum is Annex "F").**

It is may be noted here that although respondent No.2 was not shown by the corrigendum but was posted as Head Mistress GGCMS Danin although being an unlawful transfer the Respondent No 2 as Head Mistress GGCMS Danin Chitral which is against all norms as being just a subject specialist and according to the policy she can not be posted as such.

5. That the appellant approached the respondents for the reason of her premature transfer and the illegal posting of Respondent No.2 being a subject specialist but she was informed that high ups wanted and desired that respondent No. 2 be posted as Head mistress at GGCMS Danin Chitral.



date i.e. 17.03.2018 and stated discharging her duties efficiently.

(Copy of Charge assumption is Annexure "D").

It may be noted with advantage that the appellant was also drawing/receiving the monthly salary being the Headmistress of GCM2 Daini Chital as is evident from her pay slip.

(Copy of pay slip attached herewith as Annexure "E").

4. That the appellant was performing her duties when astonishing and all of sudden just after two months on 16.02.2018 respondent No 1 issued a corrigendum where in the appellant was shown as 2.No.4 and was transferred to

GCM2 Awi Chital

(Copy of the impugned corrigendum is Annex "F").

It is may be noted here that although respondent No.2 was not shown by the corrigendum but was posted as Headmistress GCM2 Daini although being an unlawful transfer the Respondent No 2 as Headmistress GCM2 Daini Chital which is against all norms as being just a subject specialist and according to the policy she can not be posted as such.

2. That the appellant approached the respondents for the reason of her premature transfer and the illegal posting of Respondent No.2 being a subject specialist but she was informed that right was wanted and desired that respondent No. 2 be posted as Headmistress of GCM2

Daini Chital.

6. That thereafter the appellant filed departmental appeal to Respondent No.4 on 17.05.2016, the same was entertained but was rejected verbally with out assigning any reason or justification.

**(Copy of Departmental appeal along with postal receipt is Annexure "G").**

7. That the appellant now prefers this service appeal for the following amongst other grounds. —

**GROUND:-**

A. That the appellant was posted as GGCMS Danin as Head Mistress where she assumed the charge on the same date i.e 17.03.2016 but just after two months she was transferred to GGHS AWI in Booni Chitral on 16.05.2016 through a corrigendum and the impugned transfer of the appellant is more than premature and on this sole ground the same is liable to be set aside.

B. That it has been reliably/learnt by the appellant as well as she was informed by the respondents that the impugned transfer order was passed due to political pressure and thus on this score too, the same needs to be struck down.

C. That the respondents have violated the statutory law as well as their own transfer posting policy as generally a civil servant has to perform her duty at a particular station at least for a period of three years, but the respondents transferred the appellant just after 2 months which is a clear violation of the law/rules which needs to be declared accordingly.

D. That the appellant performed her duties to the entire satisfaction of her superior as she remained exemplary regular and punctual and no complaint what so ever has ever been made against her from any quarter and therefore no justification exists for passing the impugned transfer orders.

E. That now a days it has become the order of the day that high ups in Education Department have ignored their sacred duty and are indulging in making undesirable, dishonest, corrupt transfer orders just to get favours from political figures and immoral favours from their subordinates to accommodate them in their desirous places/posts and the case of the appellant is the classical example of such practice prevailing in our system which needs exemplary discouragement by Courts/Tribunal of law.

F. That as is evident from the posting/transfer order of respondent No. 2 (Attia Faizi) she is a subject specialist (Chemistry) and thus she cannot be posted as Headmistress of GGCMS Danin Chitral as is evident from the instruction job manual of subject specialist (SS) officer letter No. 19-14-94 dated 24.10.2008 issued on 02.04.2010

**(Copy of relevant page is Annexure "H").**

Where in it is clearly mentioned that the powers of drawing and disbursing officer (DDO) should not be assigned/delegating to subject specialists.

G. That the transfer of the appellant is also against the spouse policy as the husband of the appellant also stationed in the same district/UC where the appellant has been posted i.e.

D. That the appellant performed her duties to the entire satisfaction of her superior as she remained exemplary regular and punctual and no complaint what so ever has ever been made against her from any quarter and therefore no justification exists for passing the impugned transfer orders.

E. That now a days it has become the order of the day that right ups in Education Department have ignored their sacred duty and are indulging in making undesirable, dishonest, corrupt transfer orders just to get favours from political figures and immoral favours from their subordinates to accommodate them in their desired places/posts and the case of the appellant is the classical example of such practice prevailing in our system which needs exemplary discouragement by Courts/Tribunal of law.

F. That as is evident from the posting/transfer order of respondent No. 2 (Atia Fozil) she is a subject specialist (Chemistry) and thus she cannot be posted as Headmistress of GCMs Daini Chitral as is evident from the instruction manual of subject specialist (22) officer letter No. 19-14-94

dated 24.10.2008 issued on 02.04.2010

(Copy of relevant page is Annexure "H").

where in it is clearly mentioned that the powers of drawing and disbursing officer (DDO) should not be assigned/delegating to subject specialists.

G. That the transfer of the appellant is also against the spouse policy as the husband of the appellant also stationed in the same district/UC where the appellant has been posted i.e.

GGCMS Danin Chitral and thus the impugned transfer order of the appellant may please be declared null and void on this score too.

**(Copy of the spouse policy is attached as Annexure "I").**

H. That the appellant was posted/transferred to GGHS AWI Chitral which is at a distance of almost 70/75 away from the House of the appellant and being a mother its is almost impossible for the appellant to travel to for on daily basis travel to on daily basis for attending her duties and thus the impugned transfer order is not only against the natural justice but also with mala-fide on the part of respondents.

I. That the provincial Govt on one hand giving statements and ordering the Govt employees to vacate the wrong positions/posts they have occupied and give directions to different departments to adjust relevant officers in their actual posts as is evident from news cuttings of daily Mashriq attached here with as Annex "J" but on the other hand playing the game of repotism & Favoritism which has to be discourage by the clear orders of the courts/tribunal of law in order to bring the rule of law in the Govt Departments and to people like the appellants from harassment and degradations.

J. That the appellant has been treated against the law and she have been deprived of equal protection.

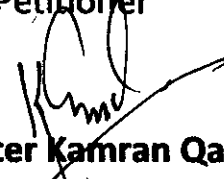
⑦

It is therefore, prayed that the impugned transfer orders of the appellant made vide corrigendum dated 16.03.2016 to GGHS AWI Booni, Chitral and that of the orders of posting/transfer of respondent No.2 posted as head mistress GGCMS Danin Being a subject specialist may please be set aside and the appellant may please be allowed to work as head mistress GGMS Danin Chitral instead of GGHS AWI BooniChitral.


Dated:-

  
Petitioner

Through

  
Barrister Kamran Qaisar  
Advocate, High Court  
Peshawar

Date: 01/08/2016

  
Es Amir Ali Shah  
Advocate Peshawar

It is therefore, prayed that the impugned transfer orders of the appellant made vide compendium dated 18.03.2016 to GHS AWI Bani Chital and that of the orders of posting/transfer of respondent No.3 posted as head mistress GCM2 Dania being a subject specialist may please be set aside and the appellant may please be allowed to work as head mistress GCM2 Dania Chital instead of GHS AWI Bani Chital.

Bani Chital.

Date:-

~~Petitioner~~

Through

Barister Naman Gaisan  
Advocate, High Court  
Peshawar

Date: 01/08/2016

**BEFORE THE CHAIRMAN SERVICE TRIBUNAL PESHAWAR**

Mst. Nasira Batool .....Petitioner

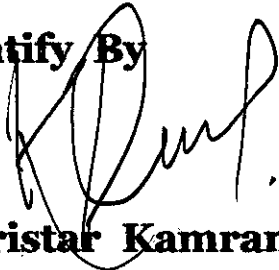
**VERSUS**

Govt of KPK through its Secretary Elementary and Secondary Education Peshawar and others.....Respondents

**AFFIDAVIT**

I, Zahid Ullah S/o Syed Abu Ali Shah R/o Ghari Chiragh Shah Tehsil and District Peshawar, (Power of attorney) do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

**Identify By**



**Barristar Kamran Qaisar  
Advocate, High Court  
Peshawar**

  
**DEPONENT**

**CNIC#17301-1549364-5**







**BEFORE THE CHAIRMAN SERVICE TRIBUNAL PESHAWAR**

Mst. Nasira Batool .....Petitioner

**VERSUS**

Govt of KPK through its Secretary Elementary and Secondary Education Peshawar and others.....Respondents

**ADDRESSES OF PARTIES**

**PETITIONER**

Mst. Nasira Batool

W/o Isa Muhammad


R/o Mohallah Mughlanda Tehsil and District Chitral

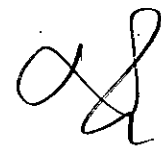
**RESPONDENTS**

1. Govt of KPK through its Secretary Elementary and Secondary Education Peshawar
2. Alia Faizi D/o Inayatullah Faizi Village Balilm Tehsil Masty District Chitral.
3. District Education officer (Female) District Chitral.
4. Director Elementary and Secondary Education KPK Peshawar

  
Petitioner

Through

  
Barrister Kamran Qaisar  
Advocate, High Court  
Peshawar

  
Amir Ali  
Khan  
Advocate

Date: 01/08/2016

BEFORE THE CHAIRMAN SERVICE TRIBUNAL PESHAWAR

Mat. Nazim Batool ..... Petitioner

VERSUS

Govt of KPK through its Secretary Elementary and Secondary Education Peshawar and others ..... Respondents

ADDRESSES OF PARTIES

PETITIONER

Mat. Nazim Batool

W/O Ja Muhammad

F/O Mohd. Mughlana Jena and District Chief

RESPONDENTS

1. Govt of KPK through its Secretary Elementary and Secondary Education Peshawar
2. Allia Fozil D/o Inayatullah Fozil Village Balam Tehsil Masty District Chief.
3. District Education officer (Female) District Chief.
4. Director Elementary and Secondary Education KPK Peshawar

Petitioner

Through

Barkat Karim Qasbi

Advocate, High Court

Peshawar

Date: 01/08/2016

Annex (A)

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

Dated Peshawar the 17-03-2016

**NOTIFICATION**

No. SO/PE/2-6/DPC Meeting (13/10/2015). On the recommendations of the Departmental Promotion Committee, the Competent Authority is pleased to promote the following Two Hundred and Thirty One (231) Female SSTs (BS-16) to the post of Head Mistresses (BS-17) on regular basis with immediate effect :-

S#	Senty: List No.	Name of Officer and School Address	Proposed place of Posting	Remarks
1	3	Musarrat Shehnaz BA SET BEd D/O Menoob Lahi GGMS Adeza, Peshawar	H/M B-17 GGHS Daman Afghani Peshawar	Against vacant post
2	66	Badri, Haram, SET, MA, SET BEd, D/O Painsda Mihanabad GGMS Gogdara Swat	H/M B-17 GGHS Gogdara Swat	Against vacant post
3	72	Sajida Ferveen MA SET BEd D/O Abdur Rehman GGMS Dhak Qutba Haripur	H/M B-17 GGHS Nala Soha Haripur	Against vacant post
4	75	San-e-na Bibi MSc BEd D/O Mumtaz Khan SET GGHS Hayatabad Peshawar	H/M B-17 GGHS Shah Kot Nowshera	Against vacant post
5	78	Naheed Akhter BA BEd D/O Fazal Rahim GGMS Noutia Jaded Peshawar	H/M B-17 GGHS Mera Kachori Peshawar	Against vacant post
6	92	Abida Jabeen SET D/O Q. Fazale Qadus BA BEd GGHS Hayatabad Peshawar	H/M B-17 GGHS Khattak Nowshera	Against vacant post
7	94	Shaheen Tabasum SET D/O Shaheer Ahmad BA BEd GGHS No.1 Kohat	H/M B-17 GGHS Merozai Kchat	Against vacant post
8	98	Bushra Bibi SET D/O Karam ul ah BA BEd SET GGHS Gandan Manshera	H/M B-17 GGHS Parhinna Manshera	Against vacant post
9	99	Nasim Akhtar SET D/O Muhammad Ayub Khan BA BEd SET GGMS Tamab Charsadda	H/M B-17 GGHS Pattagram Charadda	Against vacant post
10	101	Shaheen Akhtar SET D/O Aziz Khan BA BEd SET GGHS Badr shi NSR	H/M B-17 GGHS Nazim Pur Nowshera	Against vacant post
11	107	Yasmeen Bibi SET D/O Ajab Khan FA BEd GGMS Murad Abad Haripur	H/M B-17 GGHS Kalinjar Haripur	Against vacant post
12	109	Secma Naz SET D/O Ahmad Yar Khan BA BEd SET GGHS No.3 D.I.Khan.	H/M B-17 GGHS Nar Azad Kando Khel Lakki	Against vacant post
13	114	Rizwana Shaheen SET D/O Abdul Aziz BA BEd SET GGHS Kahal Haripur	H/M B-17 GGHS Afoli Haripur	Against vacant post
14	115	Chaman Ara SET D/O Shah Zaman BA BEd SET GGHS Paharpur D.I.Khan	H/M B-17 GGHS Tajori Lakki Marwat	Against vacant post
15	116	Aamina Durrani SET D/O Ibrar Ahmad BA BEd SET (Science) GGHS Yaka Toot Peshawar	H/M B-17 GGHS Sheikh Sardheri Charadda	Against vacant post
16	117	Bibi Tasleem SET D/O Abeer Razvi BA BEd SET GGHS University Town Peshawar	H/M B-17 GGHS Aza Khel Peshawar	Against vacant post
17	118	Shaheen Begum SET D/O Muhammad Israt BA BEd SET GGHS Dheri Malakand	H/M B-17 GGHS Tawda China Dir Lower	Against vacant post
18	119	Sadia Wali SET D/O Saif ur Rehman BA BEd SET GGHS No.2 Peshawar Cantt.	H/M B-17 GGHS Saagi Bala, Peshawar.	Against vacant post
19	123	Nasreen SET D/O Sher Malik BA BEd SET GGMS Thana Malakand	H/M B-17 GGHS Hasban Dir Lower	Against vacant post
20	124	Zubaidh Khanum SET D/O Noor Nayaz BA BEd SET GGMS Mor Chitral	H/M B-17 GGHS Shughore Chitral	Against vacant post

**ATTESTED**

*[Signature]*

75	206	Nighat Sultan, SET, MA, B, Ed D/O Zarfarosh GGMS Sarki Jala' Charsadda	H/M B-17 GGHS Ichhola Charsadda	Against vacant post
76	209	Nasim Afsa, SET, BA, B, Ed GCMHS No. 1 M. auschra.	H/M B-17 GGHS Lalo Bandi Manshera	Against vacant post
77	210	Robina Shaheen, SET, BA, B, Ed d/o Feroz Din GGMS Haripur	H/M B-17 GGHS S Gul Muhammad Abad Battagram	Against vacant post
78	211	Atia Sultan, SET, BA, B, Ed GGHS Mang Haripur.	H/M B-17 GGHS Shamlai Battagram	Against vacant post
79	215	Samra Rauf SET, BA, B, Ed GGHS KTS No. 2 Haripur.	H/M B-17 GGHS Tikri Kharari Battagram	Against vacant post
80	218	Akhter Perveen, SET, MA, B, Ed D/O Habib Rehman GGMS Naray Tangai Swat	H/M B-17 GGHS Guj gram Swat	Against vacant post
81	219	Bibi Zairab, SET, BA, B, Ed D/O M. Yousaf GGHS Ayun Chitral	H/M B-17 GGHS Shahgram Chitral	Against vacant post
82	220	Saeeda Akhtar, SET, BA, B, Ed GGMS Wari Fayz Dir Upper	H/M B-17 GGHS Wari Dir Upper	Against vacant post
83	221	Asmat Ara Begum SET BSc, BEd GGHS No. 1 Mardan.	H/M B-17 GGHS Garhi Ismirzai Mardan	Against vacant post
84	225	Fatima Gul, SET, BA, B, Ed D/O Aqal Mand GGHS Dargai Malakand	H/M B-17 GGHS Haryankot Malakand	Against vacant post
85	227	Nasira Batool, SET, MA, B, Ed GGMS Kaju Chitral Chitral	H/M B-17 GGHS Dand Chitral	Against vacant post
86	229	Shaheen, SET, MA, B, Ed D/O Shaheen Malik GGHS No. 1 Mingora Swat	H/M B-17 GGHS Sambat Swat	Against vacant post
87	231	Rukhsana Shaheen, SET, BSc, BEd d/o Sirajud Din GGHS Shabaz Garhi Mardan	H/M B-17 GGHS Bakhshali Mardan	Against vacant post
88	232	Sadaqat Nasreen, SET, MA, B, Ed D/O Saifullah GGHS Badam Bagh, Chahana Milk.	H/M B-17 GGHS Kithyari Dir Lower	Against vacant post
89	233	Jamila Begum, SET, MA, B, Ed D/O Sahib Rehmat GGHS Dabgari Peshawar.	H/M B-17 GGHS Jeewur Mardan	Against vacant post
90	234	Ahida Noreen, SET, MA, B, Ed GCMHS Qala Tarangzai Charsadda	H/M B-17 GGHS Nalagui Abad Charsadda	Against vacant post
91	235	Fakhrun Nisa, SET, BA, B, Ed D/O Abrar Nabi GGMS Mori Bala Chitral	H/M B-17 GGHS Warijon Chitral	Against vacant post
92	236	Irfad Bibi, SET, BA, B, Ed D/O Abdul Karim GGMS Jughore Chitral	H/M B-17 GGHS Warkip Chitral	Against vacant post
93	237	Shauka Ara SET, BA, B, Ed D/O Faik Muhammad GGHS Malakand	H/M B-17 GGHS Timergara Dir Lower	Against vacant post
94	238	Bibi Labun Nisa, SET, BA, B, Ed GGHS Garam Cheshma Chitral	H/M B-17 GGHS Garam Cheshma Chitral	Against vacant post
95	239	Zabida Khatoon, SET, BA, B, Ed D/O M. Ishaq GGMS Tibana Maqbool Abad Charsadda	H/M B-17 GGHS Sarki Mulyan Charsadda	Against vacant post
96	241	Hussan Ara SET, BSc, BEd GGHS Turlandi Swabi	H/M B-17 GGHS Teno Swabi	Against vacant post
97	242	Wasim Bibi, SET, MA, B, Ed GGHS Ziara: Kaka Sahib NSR	H/M B-17 GGHS Marhafi Eanda Nowshera	Against vacant post
98	243	Habibun Nisa, SET, MA, B, Ed D/O Muhabat Khan GGHS Gandigar Dir Upper	H/M B-17 GGHS Bibywar Dir Upper	Against vacant post
99	244	Qudrat Bibi, SET, GGMS Shahnighar Chitral BA, B, Ed D/O Bostan Khan	H/M B-17 GGHS Kosht Chitral	Against vacant post
100	245	Robina, SET, BSc, BEd GGHS Jandar Par Gujar Garhi Mardan	H/M B-17 GGHS Dheri Katlang Mardan	Against vacant post
101	246	Asma Shaheen SET, MA, M, Ed GCMHS Haripur.	H/M B-17 GGHS Amira Battagram	Against vacant post
102	249	Fasim Raziq, SET, GGHS Samandar Kata BSc; BEd A/Abad	H/M B-17 GGHS Siyal Kot A/Abad	Against vacant post
103	250	Fakhrua Nisa, SET, BSc, BEd D/O Abdullaha GGHS Kotka Juma Khan Bannu	H/M B-17 GGHS Pinda Khel Bannu	Against vacant post
104	251	Saeeda Begum, SET, BA, B, Ed D/O M. Saeed GGHS, Matta Swat	H/M B-17 GGHS Kari Swat	Against vacant post

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**ATTESTED**

225	428	Na jia Khatoon, SET, BSc: BEd GGHS Hassa D.I.Khan.	H/M B-17 GGHS Gandhi Kha. Khel Lakki	Against vacant post
226	430	Naz Perwar, SET, M.A. BEd GGM: Sura Shah Prang ghar Mohamand Agency	H/M B-17 Service placed at the disposal of Director Edu: FATA	Against vacant post
227	431	Rozina Imtiaz, SET, BSc: BEd GGHS Naiwala D.I.Khan.	H/M B-17 GGHS Deli Mela Karak	Against vacant post
228	433	Mussarat Jehan, SET, M.A. BEd GGHS Bugdada No.2 Mardan	H/M B-17 GGHS Aman Khan Mardan	Against vacant post
229	435	Yasmin Begum, SET, BA BEd d/o Shazaram Khan GGMS Manyal Dir	H/M B-17 GGHS Manyal Dir Lower	Against vacant post
230	436	Fazilat SET, BA BEd GGMS Jambal Swat	H/M B-17 GGHS Koza Bandai Swat	Against vacant post
231	439	Gul Nasreen, SET, MSc BEd GGHS Bagra Hari, ur.	H/M B-17 GGHS Batta' Manshra	Against vacant post

### Consequential Posting/Transfer

232	Bushra Begum HM B-17 GGHS Dag Besud Nowshera	H/M B-17 GGHS Aza Khel Bala Nowshera	Against vacant post
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2. On their promotion, the Head Mistresses concerned will be on probation for a period of one year in terms of Section 6(2) of NWFP Civil Servant Act, 1973 read with Rule 15(1) of the NWFP Civil Servant (Appointment, Promotion & Transfer) Rules, 1989.

3. No TA/DA allowed.

Endst. No. & date as above.

SECRETARY

Copy to:

1. The Additional Chief Secretary (FATA) FATA Secretariat Warsak Road Peshawar.
2. The Secretary to Govt. of Khyber Pakhtunkhwa Finance Department.
3. The Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department.
4. The Accountant General Khyber Pakhtunkhwa, Peshawar.
5. PSO to Chief Secretary to Govt. of Khyber Pakhtunkhwa.
6. The Director (E&SE) Khyber Pakhtunkhwa, Peshawar.
7. The Director Education FATA, Warsak Road, Peshawar.
8. The Director Curriculum & Teachers Education, Abbottabad.
9. The Director ESRU, Khyber Pakhtunkhwa.
10. The Deputy Director (EMIS), E&SE Department, with the request to upload the notification of E&SE Department website.
11. The District Education Officers, Elementary & Secondary Education concerned.
12. The District Accounts Officers concerned.
13. PS to Secretary E&SE Department.
14. Headmistress/SS concerned.
15. Office File.

*Rasul M. A.*  
SECTION OFFICER PRIMARY

*Rasul M. A.*  
ATTESTED

*Rasul M. A.*

Annex (C)

14

GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Dated Peshawar the 08<sup>th</sup> October 2010

NOTIFICATION

No. S. 2513-2/2004/(Female) - Consequent upon the recommendations of Khyber Pakhtunkhwa Public Service Commission Peshawar, the Competent Authority is pleased to appoint the following Subject Specialists (Female) in the relevant subjects in BS-17 (Rs. 9850-740-24650) plus GSO, on a temporary basis under the rules on regular basis under the existing policy of the Provincial Government:-

- | S.No | Name/Father's Name & Address   |
|------|--|
| 1.   | Ms. Javria Zakir D/O Zakir Hussain Shah Villager, Sultanpur P.O. Havelian, Gant. Teh. Havelian Distt. Abbottabad.                        |
| 2.   | Ms. Salma Gul D/O Sa'id Muhammad House No. 47/B Mohallah Rabnawaz Railway Road Bannu   |
| 3.   | Ms. Tazeem Akhtar D/O Mustafa Khan C/O Shahidullah House No. 11 Officer Colony Miranshah Road Bannu                                      |
| 4.   | Ms. Mehrun Nisa D/O Siraj-ur-Rehman Village Kaniweri F.O. & Teh. Tangi Distt. Charsadda  |
| 5.   | Ms. Uzma Khattak D/O Abdul Qayyum Khattak House No. 89 Armour Colony No. 1 Manki Road Nowshera   |
| 6.   | Ms. Saima Shaheen D/O Ghulam Farid Model Town P.O. Muryat, D.I. Khan   |
| 7.   | Ms. Haleema D/O Amir Muhammad Village & P.O. Jamal Ghari, Mohallah Khan Distt. & Tehsil Mardan   |
| 8.   | Ms. Safina Hayat D/O Khizar Hayat C/O Shah Niaz Khan near Union Council Vill. & P.O. Bazar Ahmad Khan Bannu                              |
| 9.   | Ms. Zoonera Hayat D/O Hayatullah Village & P.O. Prang Yasin Zai Tehsil & Distt. Charsadda  |
| 10.  | Ms. Nusrat Mehreen D/O Muhammad Nawaz Khan House No. 352/B Inside Hinjal Gate Bannu City   |
| 11.  | Ms. Anjreen Gul D/O Inayatullah Khan at Shaqat Printing near Saleem Theatre Janchi Bazar Bannu City                                      |
| 12.  | Ms. Bushra D/O Muhammad Azeem Afridi H.No. 25, No. 23 Rahatabad Opposite Forest College Peshawar   |
| 13.  | Ms. Munaza Hassan D/O Muhammad Hassan Headmaster, Mohallah Upper Jabri Near GPO Masjid-e-Aqsa Mansehra                                   |
| 14.  | Ms. Tehmina Hanan Lodhi D/O Abdul Hanan Lodhi H. No. AC/1792 Mohallah Lohar Banda Mansehra   |
| 15.  | Ms. Pariwashi D/O Pir Ahmad Shah Pariwashi C/O Riaz S/O Gul Fardin Leather Merchant Main Bazar Takht Bhai Marda                          |
| 16.  | Ms. Humaira Saeed D/O Muhammad Saeed House No. 304 Mohallah Garhi Dhoh-e-Wal Kohat City  |
| 17.  | Ms. Sabiha D/O Fazal Mahmood House No. 174/A Gharib Abad No. 2 Supply Depot near City Railway Station Peshawar                           |
| 18.  | Ms. Zobia Afshern D/O Ghulam Farid, Flat Inal Karim Market, Rashheed Town Ishrat Cinema Road Gulbahar No. 3 Peshawar                     |
| 19.  | Ms. Najma Shaheen D/O Eid Muhammad Mohallah Shoozi Khel near old DGO Hospital Karak Teh. & Distt Karak.                                  |
| 20.  | Ms. Mehmoona Kanwal D/O Iltaf Muhammad (Rtd.) H/Lt C/O Imtiaz General Store Paracha Town near Grid Station Pindi Road Kohat              |
| 21.  | Ms. Shaheena Anjum D/O Murad Ali Khan Village & P.O. Sudher Teh. Chota Lahori Distt. Swabi   |
| 22.  | Ms. Iram Saidal D/O Saidal Khan House No. 5/77, Garden Colony Buzhadi Chickerkot Kohat   |
| 23.  | Ms. Kausar D/O Muhammad Hilal Quarter No. C-74 College Colony Saidu Sharif Swat  |
| 24.  | Ms. Nasreen Yousaf D/O Yousaf Khan Mujeeb Rasool Karyana Marchent Main Bazar Lalki Marwa   |
| 25.  | Ms. Fatima Gul D/O Faza Amir Village & P.O. Dargah Mohallah Kohi Chum/Swati Chum Malakand Ager   |
| 26.  | Ms. Qamar Sultana D/O Saeed Khan C/O Prof. Nadeem Khan Buzhadi Govt. College Peshawar  |
| 27.  | Ms. Nabila Nawaz D/O Muhammad Nawaz Village & P.O. Tarangan Bala Teh. & Distt. Mansehra  |
| 28.  | Ms. Fareeha Hayat D/O Muhammad Hayat Khan House No. 110/D Inside Phoori Gate Bannu City  |
| 29.  | Ms. Farid Fatima D/O Sanat Shah C/O Naeem Khan House No. 118 B Street No. 3 (Post office) Sector No. 4 Kohat Development Authority Kohat |
| 30.  | Ms. Nusrat-un-Nisa Khan D/O Dr. Amir Ghulam Khan C/O Siraj Medical Complex North West Circular Road D.I. Khan                            |
| 31.  | Ms. Salma Rehman D/O M. Saeed-ur-Rehman, House No. 019 Mohallah Momin Town Muhanna Street 1-A Dalazak Road Pesh.                         |
| 32.  | Ms. Huma Tabbassum D/O Muhammad Humayun, Mohallah Singillian, Vill. & P.O. Dhuntoor Teh. & Distt. Abbottabad                             |
| 33.  | Ms. Sabiha Naz D/O Shamir-ur-Rehman, Mohallah Bazed Khel Village & P.O. Saleem Khan Tehsil & Distt. Swabi                                |
| 34.  | Ms. Samina Arshid D/O Arshid Mehmood, C/O Arshid Mehmood Agency Karosine Oil Haripur Road Haripur Distt. Abbottabad.                     |
| 35.  | Ms. Samaira Mahmood D/O Shah Mahmood, House No. 102 Sector No. 2 Sector N/2 Phase 4 Hayatabad Peshawar                                   |
| 36.  | Ms. Aisha Zeb D/O Jehan Zeb, Village & P.O. Agra Pevan Distt. & Teh. Charsadda   |
| 37.  | Ms. Tahira Jabeen D/O Muhammad Yaqoob Khan, Village & P.O. Kailog Teh. & Distt. Haripur  |

ATTESTED

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

Dated Peshawar the, October 8, 2010

**NOTIFICATION:**

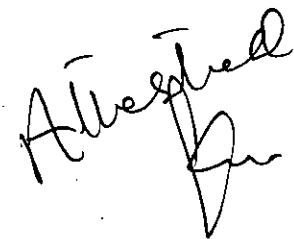
No.SO(S)3-2/2004/(Female). Consequent upon the recommendations of Khyber Pakhtunkhwa Public Service Commission, Peshawar the competent Authority is pleased to appoint the following subject specialists (Female) in the relevant subjects in BS-17 (Rs.9850-740-24650) (sic) permissible under the rules on regular basis under the existing policy of the Provincial Government.

S#	Name/Father's Name & Address
1.	Ms. Javeria D/o Zakir Hussain Shah Village Sultanpur P.O Havelian Cantt. Tehh Havelian Distt. Abbottabad
2.	Ms. Salam Gul D/o Said Muhammad House No.47/B Mohallah Rabnawaz, Railway Road, Bannu.
3.	Ms. Tazeem Akhtar D/o Mustafa Khan C/o Shahid Ullah House No.11 Officer Colony Miranshah Road, Bannu
4.	Ms. Mehrun Nisa D/o Sira-ur-Rehman Village Kaniwer P.O & Teh. Tangi Distt. Charsadda
5.	Ms. Uzma Khattak D/o Abdul Qayyum Khattak House No.89 Armour Colony No.2 Manki Road, Peshawar
6.	Mr. Saima Shaheen D/o Ghulam Farid Model Town, P.O Muryali D.I. Khan
7.	Ms. Haleema D/o Amir Muhammad Village & P.O Jamal Ghari, Mohallah Khan Distt & Tehsil Mardan
8.	Mst. Safina Hayat D/o Khizar Hayat C/o Shah Niaz Khan near Union Council Vill & P.O Bazar Ahmad Khan Bannu
9.	Ms. Zoneera Hayat D/o Hayatullah Village & P.O Prang Yasin Zai Tehsil & Distt: Charsadda
10.	Ms. Nusrat Mehreen D/o Muhammad Nawaz Khan House No.352/B Inside Hinjal Gate Bannu City
11.	Ms. Ambreen Gul D/o Inayatullah Khan Al-Shafaqat Panter, near Saleem Threater Tanchi Bazar Bannu City.
12.	Ms. Bushra D/o Muhammad Azeem Afirid House No.25 No.13 Rahatabad Opp: Forest College Peshawar.
13.	Ms. Munaza Hassan D/o Muhammad Hassan Headmaster, Mohallah Upper Jabri near GPO Masjid-e-Aqsa Mansehra.
14.	Ms. Tehmina Hanan Lodhi D/o Abdul Hanan Lodhi House No.AC/1792 Mohallah Lohar Banda Manseh
15.	Ms. Pariwash D/o Pir Ahmad Shah Parwash C/o Riaz s/o Gul Fadin Leather Merchant Mian Bazar Takht Bhai Mardan
16.	Ms. Humaira Saeed D/o Muhammad Saeed House No.1304 Mohallah Garhi Dhoh-e-wal Kohat City.
17.	Ms. Sabiha D/o Fazal Mahmood house No.174/A Gharib Abad No.2, Supply depot near City Railway Station Peshawar.

*Attest*



18.	Ms. Zobia Afsheen D/o Ghulam Farid, Flat Sabal Karim Market, Rasheed Town, Ishrat Cinema Road, Gulbahar No.3 Peshawar
19.	Ms. Najma Shaheen D/o Eid Muhammad Mohallah Shoozi Khel near old DGQ Hospital Karak Tehsil & District Karak.
20.	Ms. Mehmoona Kanwal D/o Iltaf Muhammad (Rtd). H/Lt C/O Imtiaz General Store Paracha Town, near Grid Station Pindi Road, Kohat.
21.	Ms. Shaheena Anjum D/o Murad Ali Khan Village & P.O Sudher The. Chota Lahore District, Swabi
22.	Ms. Iram Saidal D/o Saidal Khan House No.T/577, Garden Colony Behzadi Chikerkot Kohat
23.	Ms. Kausar D/o Muhammad Hilal Quarter No.C-74 College Colony Saidu Sharif Swat.
24.	Ms. Nasreen Yousaf D/o Yousaf Khan Mujeeb Rasool Karyana Marchent Main Bazar Lakki Marwat
25.	Ms. Fatima Gul D/o Fazal Amir Village & P.O Dargai Muhallah Kohi Chum/Swati Chum Malakand Agency
26.	Ms. Qamar Sultana D/o Saeed Khan C/o Prof. Nadir Khan Bettani Govt. College Peshawar
27.	Ms. Nabila Nawaz D/o Muhammad Nawaz Village & P.O Tarangri Bala Teh & Distt: Mansehra
28.	MS. Fareeha Hayat D/o Muhammad Hayat Khan House No.10/D Inside Phoori Gate, Bannu City.
29.	Ms. Farid Fatima D/o Sanat Shah C/o Naeem Khan house No.118-B, Street No.3 (post office, sector No.4, Kohat Development Authority Kohat)
30.	Mst. Nusrat-un-Nisa Khan D/o Dr. Mir Ghulam Khan C/o Siraj Medical Complex North West Circular Road D.I. Khan
31.	Ms. Salma Rehman D/o M. Saeed-ur-Reman, house No.019 Mohallah Momin Town, Muhammad Street 1-A, Dalazak Road, Peshawar.
32.	Ms. Huma Tabbasum D/o Muhammad Hamayun, Mohallah Singillina, Vill & P.O Dhumtoor Teh & Distt Abbotabad
33.	Ms. Sabiha Naz D/o Shams-ur-Rehman, Mohallah Bazed Khel Village & P.C. Saleem Khan Tehsil & District Swabi
34.	Ms. Samina Arshid D/o Arshid Mehmood C/o Arshid Mehmood Agency Karosine Oil Haripur Road, Havilian District Abbottabad
35.	Ms. Sumaria Mahmood, D/o Shah Mahmood, House No.102, Street No.2, Sector N/2, Phase-4, Hayatabad Peshawar
36.	Ms. Aisha Zeb D/o Jehan Zeb, Village & P.O Agra Payan Distt: & Teh Charsadda
37.	Ms. Tahira Jabeen D/o Muhammad Yaqoob Khan, Village & P.O Kaileg Teh & Dis: Haripur

*Attested*  


15

The Competent Authority is further pleased to appoint & post the following candidates recommended by Khyber Pakhtunkhwa Public Service Commission, who were already appointed contract and subsequently regularized as under:-

S.No.	Name/Father's Name & Address	Proposed place of posting	Remarks
1.	Ms. Abida D/O Kachkol Khan Village & P.O Thana Malakand	Subject Specialist History-cum-Civics (BS-17) GGHSS Ouch Dir Lower	Post already occupied by her c regularization fro contract.
2.	Ms. Seema D/O Farmanullah Mohallah Zafar Park Batkhela Malakand	Subject Specialist English (BS-17) GGHSS Manglore Swat	-do-
3.	Ms. Atiya D/O Ghulam Rehmani C/O Abdul Amin Rice Dealer Main Bazar Batkhela Malakand	Subject Specialist Economics (BS-17) GGCMHSS Timergara Dir Lower	-do-
4.	Ms. Aneela Kausar D/O Hafiz Fazal Roof, Afzal mam Colony Pat Baba Road Takht Bhai Mardan	Subject Specialist Statistics (BS-17) GGHSS Shakardara Kohat	-do-
5.	Ms. Shaista Zeb D/O Abdul Hakam Mohallah Dheriser Vill. & P.O Marghuz Teh. & Distt. Swabi	Subject Specialist Biology (BS-17) GGHSS Kota Swabi.	-do-
6.	Ms. Jehan Ara Gul D/O Muhammad Bahadar Khan Vill. & P.O Kalabat Tehs. & Distt. Swabi	Subject Specialist Biology (BS-17) GGHSS Lahor Swabi	-do-
7.	<del>Ms. Attiya Faizi D/O Inayatullah Faizi Village Balim Tehsil Mastuj Distt. Chitral</del>	<del>Subject Specialist Chemistry (BS-17) GGHSS Barwal Bandi Dir Upper</del>	<del>-do-</del>
8.	Ms. Bibi Zuhra D/C Toti Rahman Mohallah Sherzada Khan Taj Chowk Mingora Swat	Subject Specialist Chemistry (BS-17) GGHSS Manglore Swat	-do-
9.	Ms. Zaib-un-Nisa D/o Payo Dar Khan C/O Payo Dar Khan SET, GHSS Tough Bala Kohat	Subject Specialist Chemistry (BS-17) GGHSS Teri Karak	-do-
10.	Ms. Shahida D/O Amanullah Kulachi House South Circular Road D.I. Khan	Subject Specialist Chemistry (BS-17) GGHSS Kulachi D.I. Khan	-do-

**TERMS & CONDITIONS**

- Their services will be considered regular but without Pension & Gratuity in terms of Section-19 of the NWFP Civil Servant Act, 1973 as amended vide NWFP Civil Servants (Amendment) Act, 2005. They will however be entitled to Contributory Provident Fund in such a manner and at such rates as prescribed by the Government.
- The Subject Specialists who are already in Government Service and working against pensionable posts on regular basis before 1<sup>st</sup> day of July 2001, without any service break, on application to Khyber Pakhtunkhwa Public Service Commission through proper channel and selection by the Commission, are appointed and allowed choice of option either to retain benefit of pension & gratuity as allowed to them under their previous terms of appointment or to avail the benefit of Contributory Provident Fund allowed to them under new appointment.
- Their services are liable to termination on one month's notice from either side. In case of resignation without notice their one month pay/allowances, shall be forfeited to the Government.
- The appointees should join their posts within 30 days of the issuance of this notification. The Director, ESSE Peshawar would furnish a certificate to the effect that the candidates have joined the posts otherwise after one month of the issuance of this Notification, failing which their candidature will expire automatically and no subsequent appeal etc shall be entertained.
- They would be on probation for a period of one year extendable for another one year.

**ATTESTED**

3. The competent Authority is further pleased to appoint and post the following candidates recommended by Khyber Pakhtunkhwa Public Service Commission, who were already appointed contract and subsequently regularized as under:-

S#	Name/Father's Name & address	Proposed place of posting	Remarks
1.	Ms. Abida D/o Kachkol Khan Village & P.O Thana Malakand	Subject Specialist History-cum-Civics (BS-17) GGHSS Ouch Dir Lower	Post already occupied by her (sic) regularization from contract.
2.	Ms. Seema D/o Farmanullah Mohallah Zafar Park, Batkhela, Malakand	Subject Specialist English (BS-17) GGHSS Manglore Swat	-do-
3.	Ms. Atiya d/o Ghulam Rehmani C/o Abdul Amin & Sons Rice Dealer Main Bazar, Batkhela Malakand	Subject Specialist Economics (BS-17) GGCMHSS Timergara Dir Lower	-do-
4.	Ms. Aneela Kausar D/o Hafiz Fazal Rouf, Afzal Imam Colony Pat Baba Road, Takht Bhai Mardan	Subject Specialist Statistics (BS-17) GGHSS Shakardar Kohat	-do-
5.	Ms. Shaista Zeb D/o Abdul Hakam Mohallah Dheriser Vill & P.O Marghuz Teh & Distt. Swabi	Subject Specialist Biology (BS-17) GGHSS Kota Swabi	-do-
6.	Mst. Jehan Ara Gul d/o Muhammad Bahadar Khan Vill. & P.O Kalabat Tehs & District Swabi	Subject Specialist Biology (BS-17) GGHSS Lahore Swabi	-do-
7.	Mst. Attiya Faizi D/o Inayaullah Fazia Village _____ Tehsil Mastaj Distt: Chitral	Subject Specialist Chemistry (BS-17) GGHSS Barwal Bandi Dir Upper	-do-
8.	Mst. Bibi Zuhra D/o Toti Rahman Mohallah Sherzada Khan Taj Chowk, Mingora Swat	Subject Specialist Chemistry (BS-	-do-

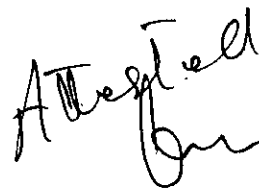
*Atiqul*  
*Ali*

USA

		17) GGHSS Manglore	
9.	Ms. Zaib-un-Nisa D/o Payo Dar Khan C/o Payo Dar Khan SET, GHSS, Tough Bala Kohat	Subject Specialist Chemistry (BS-17) GGHSS Teri Karak	-do-
10.	Ms. Shahida d/o Amanullah Kulachi House South Circular Road, D.I.Khan	Subject Specialist Chemistry (BS-17) GGHSS Kulachi D.I.Khan	-do-

## TERMS &amp; CONDITIONS:

1. Their services will be considered regular but without Pension & Gratuity in terms of Section-19 of the NWFP Civil Servant Act, 1973 as amended vide NWFP Civil Servants (Amendment) Act, 205. They will however be entitled to Contributory Provident Fund in such a manner and at such dates as prescribed by the Government.
2. The subject specialist who are already in Government Service and working against pensionable posts on regular basis before 1<sup>st</sup> day of July 2001, without any service break, on application to Khyber Pakhtunkhwa Public Service Commission through proper channel and selection by the Commission are appointed and allowed choice of option either to retain benefit of pension & gratuity as allowed to them under their previous terms of appointment or to avail the benefit of Contributory Provident Fund allowed to them under new appointment.
3. Their services are liable to termination on one month's notice from either side. In case of resignation without notice their one month pay/allowances, shall be forfeited to the Government.
4. The appointees should joint their posts within 30 days of the issuance of his notification. The Director, E&SE Peshawar would furnish a certificate to the effect that the candidate have joined the posts otherwise after one month of the issuance of this notification, failing which their candidate will expire automatically will expire automatically and no subsequent appeal etc shall be entertained.
5. They would be on probation for a period of one year extendable for another one year.

Attested  


7. Their services can be terminated at any time, in case their performance is found unsatisfactory during probation period.
8. Charge report should be submitted to all concerned.
9. No TA/DA will be allowed to the appointees for joining their duty.

SECRETARY TO GOVT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

ENDST. OF EVEN NO. & DATE

Copy forwarded for information & necessary action to:

- 1- Accountant General, Khyber Pakhtunkhwa Peshawar.
- 2- Director, E&SE, Peshawar.
- 3- Director, Curriculum & Teacher Education Abbottabad.
- 4- Director of Education (ATA) Peshawar.
- 5- EDOs, E&SE Concerned.
- 6- District Accounts Officers Concerned.
- 7- Director Recruitment, Khyber Pakhtunkhwa Public Service Commission, Peshawar.
- 8- Principal Concerned.
- 9- PS to Minister for Education, E&SE, Khyber Pakhtunkhwa.
- 10- PS to Chief Secretary, Khyber Pakhtunkhwa.
- 11- PS to Secretary, E&SE Department.
- 12- Officers Concerned.
- 13- Office order file.

(Sayed Ahmad Khan)  
SECTION OFFICER (SCHOOLS)

TESTED

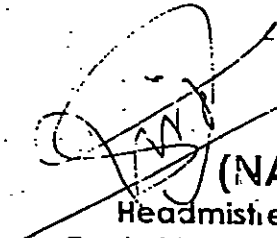


Annex (D) (17)

**GOVERNMENT OF KHYBER PAKHTUNKHWA**

**CHARGE ASSUMPTION REPORT**

In compliance with the Order of Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department Notification No. SO (PE)/2-6/DPC Meeting (13/10/2015) Promote from SST (BS-16) To the Post of Headmistress (BS-17) on regular basis Dated Peshawar the 17-03-2016, at serial No. 85. I assumed the charge of the Post of Headmistress, in BPS-17, Office of the Govt. Girls Centennial Model High School Denin Chitral today on 17-03-2016 (F/noon).

  
(NASIRA BATOOL)  
Headmistress BPS-17 (Regular)  
Govt. Girls Centennial Model High  
School Denin Chitral

**OFFICE OF THE HEADMISTRESS GOVT. GIRLS CENTENNIAL MODEL  
HIGH SCHOOL DENIN DISTRICT CHITRAL**

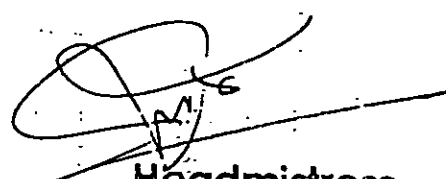
No. 756-61 /

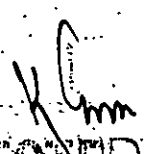
Dated 17<sup>th</sup> March 2016.

Copy Forwarded to the:-

1. Director E&SE Khyber Pakhtunkhwa, Peshawar.
2. PS to Secretary E&SE Department, Khyber Pakhtunkhwa.
3. District Education Officer (Female) Chitral.
4. District Accounts Officer Chitral.
5. District "EMIS" DEO Female Office Chitral.
6. Office file.

For information And necessary action please.

  
Headmistress  
Govt. Girls Centennial Model High  
School Denin Chitral

  
ATTESTED

THE UNIVERSITY OF CHICAGO

PHYSICS DEPARTMENT

PHYSICS 309

PROBLEM SET 10  
DUE DATE: 11/15/11  
TOTAL POINTS: 100

QUESTION 1 (20 points)

A particle of mass  $m$  moves in a potential  $V(x) = \frac{1}{2}kx^2$ . The energy of the particle is  $E$ . Find the probability of finding the particle between  $x_1$  and  $x_2$ .

ANSWER:

QUESTION 2 (20 points)

18

Annex (E)  
QAD (P)

70

A.T.M.-9.  
(See Para 59, Audit Manual)

PAY SLIP

OFFICE OF THE ADAO chitral.

No ..... the ..... 19

Mst, Nasira Baitool H.K.B-17  
QCMHS Denim chitral.  
(20680-1555-57780) he is entitled to draw pay and allowances at the monthly rates shown below from the dates specified less already drawn :-

Detail of calculation

	From	From	From	From
Substantive Pay	17-3-76			
Pay=	48670			
Officiating pay				
HRA=	2955			
Overseas pay				
CHA=	100			
Special pay				
CA=	5000			
Indexed Pay				
UAA=	4500			
MA=	3373			
AR50%	8995			
AR-13	5100			
AR-14	3400			
Total	AR-15	4867		

All deduct in the specified rates.

Add: District Accounts Office  
QAD Central

Rs 86960/-

ATTESTED



Amex (F)

19



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Dated Peshawar the 16-05-2016

CORRIGENDUM

No. SO(PE)/2-GDPC/Meeting (13/10/2016) : In partial modification of this Department Notification of even number dated 17/03/2016, the following officers are hereby posted and adjusted as mentioned against each:

S.N o	SL#	Name of Officer	Already Adjusted at	Proposed As	Remarks
1.	92	Mst. Abida Jabeen	H/M B-17 GGHS Khatak Nowshera	H/M B-17 GGHS Jamroz Khan Killay Charsadda	Against vacant post
2.	129	Mst. Zahida Parveen	H/M B-17 GGHS Malach A/Abad	H/M B-17 GGHS Namli Mera A/Abad	Against vacant post
3.	402	Mst. Shagufta Yasmin	H/M BS-17 GGHS Sari Haripur	H/M B-17 GGHS Jarced Marschra	Against vacant post
4.	227	Mst. Nasira Batool	H/M B-17, at GGHS Daman Chitral	H/M B-17 GGHS Awi Chitral	Against vacant post
5.	135	Mst. Najma Begum	H/M GGHS Kohn Barmal Mardan	H/M B-17 GGHS Fatima Mardan	Against vacant post
6.	65	Mst. Dilshad	H/M B-17 GGHS Saragou Ahmad Mardan	H/M B-17 GGHS Muhammad Wali Killay Mardan	Against vacant post
7.	172	Mst. Perveen Wais	H/M B-17 GGHS Parsana Kohat	H/M B-17 GGHS Khadar Ehel Kohat	Against vacant post
8.	129	Mst. Sahira Bano	H/M B-17 GGHS Terri Malakai J	H/M B-17 GGHS Qaidara Malakand	Against vacant post
9.	227	Mst. Rozina Inmaz	H/M B-17 GGHS Deli Niela Karak	H/M B-17 GGHS Jehangiri Karak	Against vacant post
10.	13	Mst. Talasunn Mehtawood	H/M B-17 GGHS Sawa Dir Lower	H/M B-17 GGHS Talaiseya Dir Lower	Against vacant post
11.	350	Rashida Begum	H/M B-17 GGHS Ziam Dera Dir Lower	H/M B-17 GGHS Lodi gram Dir Lower	Against vacant post
12.	17	Mst. Mushida	H/M B-17 GGHS Pajman Swabi	H/M B-17 GGHS Kalu Dera Swabi	Against vacant post
13.	151	Mst. Iqbal Eswab	H/M B-17 GGHS Ahmad Abad Karak	H/M B-17 GGHS Sur Jag Karak	Against vacant post
14.	151	Mst. Tehida Begum	H/M B-17 GGHS Machan Mardan	H/M B-17 GGHS Chamdheri Mardan	Against vacant post
15.	96	Mst. Hussan Ara	H/M B-17 GGHS Tera Swabi	H/M B-17 GGHS Sarwar Shah Kotai Swabi	Against vacant post
16.	106	Mst. Taskeen Begum	H/M B-17 GGHS Chenglai Bunir	H/M B-17 GGHS Degai Bunir	Against vacant post
17.	106	Mst. Baswar Jan	H/M B-17 GGHS Kotka Dautar Khan Bannu	H/M B-17 Dheri Ghandi Esaki Bannu	Against vacant post
18.	123	Mst. Bibi Aisla	H/M B-17 GGHS Senazo Shah Charsadda	H/M B-17 GGHS Ucha Wala Charsadda	Against vacant post
19.	21	Mst. Shaheen Badar Shaheen	H/M B-17 GGHS Manji Banda Karak	H/M B-17 GGHS Gul Imam Tank	Against vacant post
20.	21	Mst. Sultana Sadhar	H/M BS-17 GGHS Gwalera Swat	H/M B-17 GGHS Ningolai Swat	Against vacant post
21.	77	Mst. Rubina Shaheen	H/M BS-17 at GGHS Gul Muhammad Bahagram	H/M B-17 GGHS Gandian Haripur	Against vacant post
22.	78.	Mst. Attiya Sultana	H/M BS-17 GGHS Shantai Bahagram	H/M B-17 GGHS Kohala Bala Haripur	Against vacant post

ATTESTED

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

Dated Peshawar the 16.05.2016

**CORRIGENDUM:**

NO.SO(PE)/2-6/DPCMeeting (03.10.20\_\_). In partial modification of this Department Notification of even number dated 17.03.2016 the following officers are hereby posted and adjusted as mentioned against each:

S.No.	Sr#	Name of officer	Already adjusted at	Proposed as	Remarks
1.	92	Mst. Abida Jabeen	H/M B-17 GGHS Khattak Nowshera	H/M B-17 GGHS Jamroaz Khan Killay Charsadda	Against vacant post
2.	129	Mst. Zahida Parveen	H/M B-17 GGHS Malach A/Abad	H/M B-17 GGHS namli Mera A/Abad	Against vacant post
3.	402	Mst. Shagufta Yasmin	H/M B-17 GGHS Sari Haripur	H/M B-17 GGHS GGHS Jareed Mansehra	Against vacant post
4.	227	Mst. Nasira Batool	H/M B-17 GGHS Danen Chitral	H/M B-17 GGHS Awi Chitral	Against vacant post
5.	135	Mst. NAjma Begum	H/M B-17 GGHS Kohi Batmol Mardan	H/M B-17 GGHS Fatima Mardan	Against vacant post
6.	63	Mst. Dilshd	H/M B-17 GGHS Sanga Gul Ahmad Mardan	H/M B-17 GGHS Muhammad Wali Killay Mardan	Against vacant post
7.	172	Mst. Parveen Waris	H/M B-17 GGHS Parsant Kohat	H/M B-17 GGHS Khadar Khel Kohat	Against vacant post
8.	139	Mst. Sahira Bano	H/M B-17 GGHS (sic) Malakand	H/M B-17 GGHS Qaldara Malakand	Against vacant post
9.	227	Mst. Rozina Imtiaaz	H/M B-17 GGHS Deli Mela Karak	H/M B-17 GGHS Jehangiri Karak	Against vacant post
10.	23	Mst. Talas Mehmood	H/M B-17 GGHS Swawa Dir Lower	H/M B-17 GGHS Talasieya Dir Lower	Against vacant post

*A. Ullah*  
*Ru*

11.	350	Rashida Begum	H/M B-17 GGHS Dera Dir Lower	H/M B-17 GGHS GGHS Kodigram Dir Lower	Against vacant post
12.	37	Mst. Murshida	H/M B-17 GGHS Pajman Swabi	H/M B-17 GGHS Kalu Dher Swabi	Against vacant post
13.	131	Mst. Iqbal Lawab	H/M B-17 GGHS Ahmad Abad Karak	H/M B-17 GGHS Surlag Karak	Against vacant post
14.	151	Mst. Tohida Begum	H/M B-17 GGHS Machan Mardan	H/M B-17 GGHS Chamdheri Marda	Against vacant post
15.	96	Mst. Hussan Ara	H/M B-17 GGHS (sic) Swabi	H/M B-17 GGHS Sarwar Shah Kotai Swabi	Against vacant post
16.	106	Mst. Taskeen Begum	H/M B-17 GGHS Chenglai Bunir	H/M B-17 GGHS Dagai Bunir	Against vacant post
17.	106	Mst. Baswar Jan	H/M B-17 GGHS Daulat Khan Bannu	H/M B-17 GGHS Dheri Ghandi Esaki Bannu	Against vacant post
18.	123	Mst. Bibi Aisha	H/M B-17 GGHS Senazo Shah Charsadda	H/M B-17 GGHS Ucha Wala Charsadda	Against vacant post
19.	21	Mst. Badar Shaheen	H/M B-17 GGHS Manki Banda Karak	H/M B-17 GGHS Gul Imam Tank	Against vacant post
20.	21	Mst. Sultana Sadbar	H/M BS-17 GGHS Gwalera Swat	H/M B-17 GGHS Ningolai Swat	Against vacant post
21.	77	Mst. Robina Shaheen	H/M BS-17 at GGHS Gul Muhammad Abad Batagaram	H/M B-17 GGHS Gandian Haripur	Against vacant post
22.	78	Mst. Attiya Sultana	H/M BS-17 GGHS Sharalai Battargarm	H/M B-17 GGHS Kohala Bala Haripur	Against vacant post

Attest  
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23	246	Mst. Asma Shateen	HM BS-17 GGHS Ajmra Battagram	HM B-17 GGHS Hamlet Swabi	Against vacant post
24	215	Mst. Samina Raif	HM B-17 GGF 5 Tikri Khrafi Battagram	HM B-17 GGHS Bandi Jceran Haripur	Against vacant post
25	225	Mst. Fatima Gu'	HM BS-17 GGHS Layankoi Malakand	HM BS-17 GGHS Dohandi Malakand	Against vacant post
26	345	Mst. Yasmin Afhtan	HM BS-17 GGHS Spal Bandi Swat	HM B-17 GGHS Jarabad Swat	Against vacant post
27	362	Mst. Faqia Naseem	HM BS-17 GGHS Katakai Marjan	HM B-17 GGHS Fozana Khei Nowshera	Against vacant post
28	272	Mst. Naseem Begum	HM BS-17 GGHS Kala Killy Swat	HM BS-17 GGHS Chakesar, Shantal	Against vacant post
29	150	Mst. Bibi Orana	HM BS-17 GGHS Sholing Charsadda	HM BS-17 GGHS Hoozak, Charsadda	Against vacant post
30	269	Mst. Safia Rauf	HM BS-17 GGHS Killy Nowshera	HM BS-17 GGHS Khat Killy, Nowshera	Against vacant post
31	427	Mst. Roshan Ara	HM BS-17 GGHS Nara Banda, Karak	HM BS-17 GGHS Wana Lai, D.I. Khan	Against vacant post
32	435	Mussarat chaw, SET, MA Bed	HM B-17 GGHS Mian Khan Mardan	HM B-17 GGHS Mian Khan Mardan	Against vacant post. She has retired from service on superannuation basis on 14.12.2015, while the DPC was held on 13.10.2015 thus she is promoted w.e.f. date of DPC, in light of Establishment Department Instructions SO(R-VJE&ADI-16/2005 dated 22.03.2006
33	119	Saeeda Wali SET (D) Saifur Rehman BA Bed SET GGHS No 2 Peshawar Cantt.	HM B-17 GGHS Shagi Bala, Peshawar.	May be read as Saeeda Wali HM BS-17, GGHS Shagi Bala, Peshawar instead of Sadia Wali	As amended

2. No. TA/DA allowed

SECRETARY

Enclsr. No. & date as above.  
Cops in

- 1 The Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department.
- 2 The Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department.
- 3 The Accountant General Khyber Pakhtunkhwa, Peshawar.
- 4 (PS) to Chief Secretary to Govt. of Khyber Pakhtunkhwa.
- 5 The Director (E&SE) Khyber Pakhtunkhwa Peshawar.
- 6 The Director Education F&TA, Warsak Road, Peshawar.
- 7 The Director Curriculum & Teachers Education, Pabulabad.
- 8 The Director ESRO, Khyber Pakhtunkhwa.
- 9 The Deputy Director (ENHS), E&SE Department, with the request to upload the corrigendum on E&SE Department website.
- 10 The District Education Officers, Elementary & Secondary Education concerned.
- 11 The District Accounts Officers concerned.
- 12 PS to Secretary E&SE Department.
- 13 Headmaster concerned
- 14 Office file.

*(Signature)*  
 (MUHAMMAD NASIR KHAN)  
 SECTION OFFICER PRIMARY

*(Signature)*  
 ATTESTED

To,

The Director,  
Elementary & Secondary Education KPK  
Peshawar

Annex (G)

(21)

(10)

Through:- Proper channel

Subject: Appeal against retaining SS on wrong position as Head Mistress at GGCMS Danin Chitral

Respected Sir,

With due respect it is stated that consequent upon your office Order No SO- (PE) 2-G/DPC dated 17-03-2016. I was promoted as Headmistress BPS-17 (Regular) at GGCMS Danin Chitral against the vacant Post in commensurate with the vacancy certificate issued by DEO (F) Chitral (Copy Attached). This vacant position was wrongly occupied by Miss Atia Fiazi, SS Chemistry working as instructor in RITE Drosh (Copy Attached). After taking charge of my new position, I was issued last pay certificate with new position code (copy attached). I was rendering my duties till 16-05-2016 when I received another order posting me at GGHS Awi, in Booni Chitral which is located seventy km away from my home station. (this is in utter this regards for the fulfillment of service tenure). This abrupt and untimely transfer has been made in to retain Mrs. Atia Faizi SS Chemistry in the said position of Headmistress at GGCMS Danin who had occupied it wrongly since Feb 2014 (copy attached).

I being regular Headmistress BPS-17 make my plea in your kind honour on the following legal grounds.

1. According to government notification No. SOG/S&LD/1-28/2003/VOL.III subject specialist shall be transferable only to a post relevant to his subject (copy attached).
2. Another notification No. 503-31 dated 02-04-2010 referring to the instruction / job manual of subject SS vide office letter No-1994-94 dated 24-10-2008 categorically stated that henceforth the powers of drawing and disbursing officer (DDO) should not be delegated / assigned to subject specialist (SS) working in their respective district (copy attached).
3. In policy statement published in daily Mashrig in 15 April 2016 the secretary has asked the education department to submit the list of employees occupying wrong post (copy attached).
4. Chief secretary KPK has ordered the Government employees to vacate the wrong position they have occupied and directed the departments to adjust relevant officers in their actual posts (Daily Aaj 03 April 2016 (copy attached).
5. My husband is also a Head master posted in a local station and as per spouse policy husband & wife shall be posted in One station (copy attached).

In view of the above mentioned legal grounds in your honour is requested to retain me in my previous station GGCMS Danin Chitral and Atia Faizi SS may kindly be adjusted in GGHS/ Comprehensive schools as being SS she is legally entitled to be posted in that position.

Yours Truly

Nasira Batool

Principal GGCMS Danin Chitral

Enclosures-1-11

Cc:

- Secretary Education KPK
- DEO (F) Chitral
- DMO Chitral

ATTESTED

Dated: 17-05-2016



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Dated Peshawar the 17-03-2016.

**NOTIFICATION**

No. SO/PE/2-6/DPC Meeting (13/10/2015). On the recommendations of the Departmental Promotion Committee, the Competent Authority is pleased to promote the following Two Hundred and Thirty One (231) Female SSTs (BS-16) to the post of Head Mistresses (BS-17) on regular basis with immediate effect :-

S#	Senty: List No.	Name of Officer and School Address	Proposed place of Posting	Remarks
1	3	Musarrat Shehnaz BA SET Bed D/O Meeroob Lahi GGMS Adeza, Peshawar	H/M B-17 GGHS Daman Afghani Peshawar	Against vacant post
2	66	Badr, Haram, SET, MA, SET BED, D/O Painda Mi han mad GGMS Gogdara Swat	H/M B-17 GGHS Gogdara Swat	Against vacant post
3	72	Sajida Farveen MA SET BE6 D/O Abdur Rehman GGMS Dhak Qutba Haripur	H/M B-17 GGHS Nala Soha Haripur	Against vacant post
4	75	San eena Bibi MSc BED D/O Mumtaz Khan SET GGHS Hayatabad Peshawar	H/M B-17 GGHS Shah Kot Nowshera	Against vacant post
5	78	Naheed Akhter BA BED D/O Fazal Rahim GGMS Noutia Jadedd Peshawar	H/M B-17 GGHS Mera Kachori Peshawar	Against vacant post
6	92	Azida Jabeen SET D/O Q. Fazzle Qadus BA Bed GGHS Hayatabad Peshawar	H/M B-17 GGHS Khattak Nowshera	Against vacant post
7	54	Shaheen Tabasum SET D/O Sha oor Ahmad 3A Bed GGHS No.1 Kohat	H/M B-17 GGHS Merozai Kchat	Against vacant post
8	98	Bushra Bibi SET D/O Karam ill th BA Bed SET GGHS Gand an Manscha	H/M B-17 GGHS Parhinna Manscha	Against vacant post
9	99	Nasim Akhtar SET D/O Muhammad Ayub Khan BA Bed SET GGMS Tarnab Charsadda	H/M B-17 GGHS Battagram Char: wida	Against vacant post
10	101	Shaheen Akhtar SET D/O Aziz Khan BA Bed SET GGHS Badr shi NSR	H/M B-17 GGHS Nazim Pur Nowshera	Against vacant post
11	107	Yasmeen Bibi SET D/O Ajab Khan BA Bed GGMS Murad Abad Haripur	H/M B-17 GGHS Kalinjar Haripur	Against vacant post
12	109	Secma Naz SET D/O Ahmad Yar Khan BA Bed SET GGHS No.3 D.I.Khan.	H/M B-17 GGHS Nar Azad Kando Khel Lakki	Against vacant post
13	114	Rizwana Shaheen SET D/O Abdul Aziz BA Bed SET GGHS Kahal Haripur	H/M B-17 GGHS Aoli Haripur	Against vacant post
14	115	Chaman Ara SET D/O Shah Zaman BA Bed SET GGHS Paharpur D.I.Khan	H/M B-17 GGHS Tajori Lakki Marwat	Against vacant post
15	116	Amna Durrani SET D/O Ibrar Ahmad BA Bed SET (Science) GGHS Yaka Toot Peshawar	H/M B-17 GGHS Sheikho Sardheti Char adda	Against vacant post
16	117	Bibi Tasleem SET D/O Abeer Razvi BA Bed SET GGHS University Town Peshawar	H/M B-17 GGHS Aza Khel Peshawar	Against vacant post
17	118	Shaheen Begum SET D/O Muhammad Israr BA Bed SET GGHS Dheri Malakand	H/M B-17 GGHS Taw da China Dir Lower	Against vacant post
18	119	Sadia Wali SET D/O Saif ur Rehman BA Bed SET GGHS No.2 Peshawar Cantt.	H/M B-17 GGHS Saagi Bala, Peshawar.	Against vacant post
19	123	Nasreen SET D/O Sher Malik BA Bed SET GGMS Thana Malakand	H/M B-17 GGHS Hasban Dir Lower	Against vacant post
20	124	Zuhaidra Khanum SET D/O Noor Nawaz BA Bed SET GGMS Mori Cairat	H/M B-17 GGHS Shughore Chitral	Against vacant post

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BTS/STED

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75	206	Nighat Sultan, SET, MA, B, Ed D/O Zarfarosh GGMS Sarki Jala' Charsadda	H/M B-17 GGHS Fehlola Charsadda	Against vacant post
76	209	Nasim Afsa, SET, BA, B, Ed GC CMHS No. 1 Manshra.	H/M B-17 GGHS Lalo Bandi Manshra	Against vacant post
77	210	Robina Shaheen, SET, BA, B, Ed d/o Peroz Din GGMS Haripur	H/M B-17 GGHS Gul Muhammad Abad Battagram	Against vacant post
78	211	Atia Sultan, SET, BA, B, Ed GGHS Mang Haripur.	H/M B-17 GGHS Shamlai Battagram	Against vacant post
79	215	Samira Rauf SET, BA, B, Ed GGHS KTS No.2 Haripur.	H/M B-17 GGHS Tikri Kharari Battagram	Against vacant post
80	218	Akhtar Pervcen, SET, MA, B, Ed D/O Habib Rehman GGMS Naray Tangai Swat	H/M B-17 GGHS Gu. gram Swat	Against vacant post
81	219	Bibi Zairab, SET, BA, B, Ed L/O M. Yousof GGHS Ayun Chitral	H/M B-17 GGHS Shahgram Chitral	Against vacant post
82	220	Saeeda Akhtar, SET, BA, B, Ed GGMS Wari Payen Dir Upper	H/M B-17 GGHS Wari Dir Upper	Against vacant post
83	221	Asmat Ara Begum SET BSc, BEd GGHS No.1 Mardan.	H/M B-17 GGHS Garhi Ismielzai Mardan	Against vacant post
84	225	Fatima Gul, SET, BA, B, Ed D/O Aqal Mand GGHS Dargai Malakand	H/M B-17 GGHS Haryankot Malakand	Against vacant post
85	227	Nasira Batool, SET, MA, B, Ed GGMS Kujju Chitral Chitral	H/M B-17 GGHS Dandan Chitral	Against vacant post
86	229	Shaheen, SET, MA, B, Ed D/O Shaheen Malik GGHS No.1 Mingora Swat	H/M B-17 GGHS Sambat Swat	Against vacant post
87	231	Rukhsar Shaheen, SET, BSc, BEd d/o Sirajud Din GGHS Shabaz Garhi Mardan	H/M B-17 GGHS Bakhshali Mardan	Against vacant post
88	232	Sadaqat Masroon, SET, MA, B, Ed D/O Saifullah GGHS Badam Baghcha Thana Mld.	H/M B-17 GGHS Kithyari Dir Lower	Against vacant post
89	233	Jamila begum, SET, MA, B, Ed D/O Sahib Rehmat GGHS Dahgari Peshawar.	H/M B-17 GGHS Jcw ur Mardan	Against vacant post
90	234	Ahida Noreen, SET, MA, B, Ed GC CMHS Qala Tarangzai Charsadda	H/M B-17 GGHS Nalaq Gul Abad Charsadda	Against vacant post
91	235	Fakhrun Nisa, SET, BA, B, Ed D/O Abrar Nabi GGMS Mori Bala Chitral	H/M B-17 GGHS Warijon Chitral	Against vacant post
92	236	Irfad Bibi, SET, BA, B, Ed D/O Abdul Karim GGMS Jughore Chitral	H/M B-17 GGHS Warkip Chitral	Against vacant post
93	237	Shauka Ara SET, BA, B, Ed D/O Faik Muhammad GGHS Malakand	H/M B-17 GGHS Timergara Dir Lower	Against vacant post
94	238	Bibi Labun Nisa, SET, BA, B, Ed GGHS Garam Cheshma Chitral	H/M B-17 GGHS Garamcheshma Chitral	Against vacant post
95	239	Zabida Khatoon, SET, BA, B, Ed D/O M. Ishaq GGMS Tiban, Maqbool Abad Charsadda	H/M B-17 GGHS Sarki Mulyan Charsadda	Against vacant post
96	241	Hassan Ara SET, BSc, BEd GGHS Turlandi Swabi	H/M B-17 GGHS Tzno Swabi	Against vacant post
97	242	Wasim Bibi, SET, MA, B, Ed GGHS Ziara Kaka Sahib NSR	H/M B-17 GGHS Marhati Eanda Nowshera	Against vacant post
98	243	Habibun Nisa, SET, MA, B, Ed D/O Muhabat Khan GGHS Gandigar Dir Upper	H/M B-17 GGHS Bibyawar Dir Upper	Against vacant post
99	244	Qudrat bibi, SET, GGMS Shahnighar Chitral BA, B, Ed D/O Bostan Khan	H/M B-17 GGHS Kosht Chitral	Against vacant post
100	245	Robina, SET, BSc, BEd GGHS Jandar Par Gujar Garhi Mardan	H/M B-17 GGHS Dheri Katlang Mardan	Against vacant post
101	246	Asma Shaheen SET, MA, M, Ed GC CMHS Haripur.	H/M B-17 GGHS Ajmira Battagram	Against vacant post
102	249	Fasim Raziq, SET, GGHS Samandar Kata BSc, BEd A/Abad	H/M B-17 GGHS Siyal Kot A/Abad	Against vacant post
103	250	Fakhrun Nisa, SET, BSc, BEd D/O A'dullah Jan GGHS Kotka Juma Khan Bannu	H/M B-17 GGHS Pinda Khel Bannu	Against vacant post
104	251	Saeeda Begum, SET, BA, B, Ed D/O M. Saeed GGHS, Matta Swat	H/M B-17 GGHS Kari Swat	Against vacant post

ATTESTED

225	428	Nazja Khatoon, SET, BSc; BEd GGHS Hassa D.I.Khan.	H/M B-17 GGHS Gandhi Kha., Khel Larki	Against vacant post
226	430	Naz Perwar, SET, MA, BEd, GGM, Sura Sah Prang ghar Mo. and Agenc.	H/M B-17 Service placed at the disposal of Director Edu: FATA	Against vacant post
227	431	Fozina Imtiaz, SET, Esc, BEd GGHS Maiwala D.I.Khan.	H/M B-17 GGHS Deli Mela Karak	Against vacant post
228	433	Mussarat Jehan, SET, MA, BEd GGHS Bugdada No.2 Maroon	H/M B-17 GGHS Aman Khan Mardan	Against vacant post
229	435	Yasmin, Begum, SET, BA BEd d/o Shazaran Khan GGMS Manyal Dir	H/M B-17 GGHS Manyal Dir Lower	Against vacant post
230	436	Fazilat SET, BA BEd GGMS Jambal Swat	H/M B-17 GGHS Koza Bandai Swat	Against vacant post
231	439	Gul Nasreen, SET, MSc BEd GGHS Bagra Hariapur.	H/M B-17 GGHS Batta' Mansehra	Against vacant post

### Consequential Posting/Transfer

232	Bushra Begum H/M B-17 GGHS Dag Besud Nowshera	H/M B-17 GGHS Aza Khel Bala Nowshera	Against vacant post
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2. On their promotion, the Head Mistresses concerned will be on probation for a period of one year in terms of Section 6(2) of NWFP Civil Servant Act, 1973 read with Rule 15(1) of the NWFP Civil Servant (Appointment, Promotion & Transfer) Rules, 1989.

3. No TA / DA allowed.

SECRETARY

Endst. No. & date as above.

Copy to:

1. The Additional Chief Secretary (FATA) FATA Secretariat Warsak Road Peshawar.
2. The Secretary to Govt. of Khyber Pakhtunkhwa Finance Department.
3. The Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department.
4. The Accountant General Khyber Pakhtunkhwa, Peshawar.
5. PSO to Chief Secretary to Govt. of Khyber Pakhtunkhwa.
6. The Director (E&SE) Khyber Pakhtunkhwa Peshawar.
7. The Director Education FATA, Warsak Road Peshawar.
8. The Director Curriculum & Teachers Education, Abbottabad.
9. The Director ESRU, Khyber Pakhtunkhwa.
10. The Deputy Director (EMIS), E&SE Department, with the request to upload the notification of E&SE Department website.
11. The District Education Officers, Elementary & Secondary Education concerned.
12. The District Accounts Officers concerned.
13. PS to Secretary E&SE Department.
14. Headmistress/SS concerned.
15. Office File.

*Rasim Khan*

SECTION OFFICER PRIMARY

*Rasim Khan*  
 ATTESTED





GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Dated Peshawar the 16-05-2016

25

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**CORRIGENDUM**

No. SO(PF)/2-6/DPC Meeting (13/10/2015): In partial modification of this Department Notification of even number dated 17.03.2016, the following officers are hereby posted and adjusted as mentioned against each:

S.Nr	SL#	Name of Officer	Already Adjusted at	Proposed As	Remarks
1.	92	Mst. Abida Iabeen	H/M B-17 GGHS Khattak Nowshera	H/M B-17 GGHS Jan-roz Khan Killay Charsadda	Against vacant post
2.	29	Mst. Zahida Parveen	H/M B-17 GGHS Malach A/Abad	H/M B-17 GGHS Namli Mera A/Abad	Against vacant post
3.	402	Mst. Shagufta Yasmin	H/M BS-17 GGHS Sari Haripu	H/M B-17 GGHS Jarced Manshra	Against vacant post
4.	227	Mst. Nazira Hatoon	H/M B-17 at GGHS Daman Chitral	H/M B-17 GGHS Awi Chitral	Against vacant post
5.	135	Mst. Najma Begum	H/A GGHS Kohi Barmal Mardan	H/M B-17 GGHS Fatima Mardan	Against vacant post
6.	65	Mst. Dilshad	H/M B-17 GGHS Sanga Gul Ahmad Mardan	H/M B-17 GGHS Muhammad Wali Killay Mardan	Against vacant post
7.	172	Mst. Parveen Wars	H/M B-17 GGHS Parsha Kohat	H/M B-17 GGHS Khadar Khet Kohat	Against vacant post
8.	139	Mst. Sahira Hanu	H/M B-17 GGHS Tetai Malakand	H/M B-17 GGHS Qaldara Malakand	Against vacant post
9.	227	Mst. Zayna Humaz	H/M B-17 GGHS Doli Mela Karak	H/M B-17 GGHS Jhangiri Karak	Against vacant post
10.	23	Mst. Tabassum Mahmood	H/M B-17 GGHS Sawa Dir Lower	H/M B-17 GGHS Talaiseya Dir Lower	Against vacant post
11.	390	Pashida Begum	H/M B-17 GGHS Ziam Jara Dir Lower	H/M B-17 GGHS Kodigara Dir Lower	Against vacant post
12.	57	Mst. Marhoda	H/M B-17 GGHS Pajman Swat	H/M B-17 GGHS Kafu Dheri Swabi	Against vacant post
13.	131	Mst. Iqbal Farah	H/M B-17 GGHS Ahmad Abad Karak	H/M B-17 GGHS Sundag Karak	Against vacant post
14.	151	Mst. Tahida Begum	H/M B-17 GGHS Machas Mardan	H/M B-17 GGHS Chamdheri Mardan	Against vacant post
15.	96	Mst. Hussain Ara	H/M B-17 GGHS Tano Swabi	H/M B-17 GGHS Sarwar Shah Kotai Swabi	Against vacant post
16.	106	Mst. Tasleem Begum	H/M B-17 GGHS Chenglai Bannu	H/M B-17 GGHS Daga Bannu	Against vacant post
17.	106	Mst. Haqwar Jan	H/M B-17 GGHS Kotla Daudat Khan Bannu	H/M B-17 Dheri Ghanji Esaki Bannu	Against vacant post
18.	123	Mst. Hiba Aisha	H/M B-17 GGHS Senazo Shah Charsadda	H/M B-17 GGHS Ucha Wala Charsadda	Against vacant post
19.	41	Mst. Sadia Shabeen	H/M B-17 GGHS Mainki Hada Karak	H/M B-17 GGHS Gul Imam Tank	Against vacant post
20.	21	Mst. Sultana Sadhar	H/M BS-17 GGHS Gw. Terai Swat	H/M B-17 GGHS Ningolai Swat	Against vacant post
21.	77	Mst. Robina Shaheen	H/M BS-17 GGHS Gul Muhammad Abad Battagram	H/M B-17 GGHS Gandian Haripur	Against vacant post
22.	78	Mst. Atiya Sultana	H/M BS-17 GGHS Shamlai Battagram	H/M B-17 GGHS Kohala Bala Haripur	Against vacant post

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23	236	Mst. Asma Shaiqee	HM BS-17 GGHS Ajmera Battagram	HM B-17 GGHS Hamlet Swabi	Against vacant post
24	217	Mst. Saibina Rauf	HM B-17 GGHS Tikri Kharari Battagram	HM B-17 GGHS Bandi Scean Haripur	Against vacant post
25	225	Mst. Fatima Gul	HM BS-17 GGHS Haryankot Malakand	HM BS-17 GGHS Dohandi Malakand	Against vacant post
26	345	Mst. Yasmin Akhtar	HM BS-17 GGHS Sp. i Bandi Swat	HM B-17 GGHS Arabail Swat	Against vacant post
27	36	Mst. Faqir Naseem	HM BS-17 GGHS Kaitar Mandan	HM B-17 GGHS Khana Khel Nowshera	Against vacant post
28	272	Mst. Nazeem Begum	HM BS-17 GGHS Kala Killy Swat	HM BS-17 GGHS Chakesar, Shangla	Against vacant post
29	150	Mst. Bibi Goriya	HM BS-17 GGHS Shodag Charadara	HM BS-17 GGHS Hoobak, Charadara	Against vacant post
30	269	Mst. Saiba Rauf	HM BS-17 GGHS Mulla Killy Nowshera	HM BS-17 GGHS Kait Killy, Nowshera	Against vacant post
31	427	Mst. Roshan Ara	HM BS-17 GGHS Nara Banda, Karak	HM BS-17 GGHS Wanda Lali, D.I. Khan	Against vacant post
32	433	Musserat Jehan, SET, MA Bld	HM B-17 GGHS Mian Khan Mandan	HM B-17 GGHS Mian Khan Mandan	Against vacant post. She has retired from service on superannuation basis on 14.12.2015, while the DPC was held on 15.10.2015 thus she is promoted w.e.f. date of DPC, in light of Establishment Department Instructions SO(R-VI)E&AD-16/2005 dated 22.07.2006
33	119	Saeeda Wali SET D.O.S of yr Rehman BA Bed SET GGHS No.2 Peshawar Cantt	HM B-17 GGHS Shagi Bala, Peshawar.	May be read as Saeeda Wali HM BS-17, GGHS Shagi Bala, Peshawar instead of Sadia Wali	As amended

2. No. TA /DA allowed.

Encls. No. & date as above.

Copies to

1. The Secretary Govt. of Khyber Pakhtunkhwa, Finance Department.
2. The Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department.
3. The Accountant General Khyber Pakhtunkhwa, Peshawar.
4. PSO to Chief Secretary to Govt. of Khyber Pakhtunkhwa.
5. The Director (E&SE) Khyber Pakhtunkhwa, Peshawar.
6. The Director Education FATA, Warsak Road, Peshawar.
7. The Director Curriculum & Teachers Education, Abbottabad.
8. The Director ESRI, Khyber Pakhtunkhwa.
9. The Deputy Director (ENHS), E&SE Department, with the request to upload the corrigendum on E&SE Department website.
10. The District Education Officers, Elementary & Secondary Education concerned.
11. The District Accounts Officers concerned.
12. PSO to Secretary E&SE Department.
13. Headmistress concerned.
14. Office File.

SECRETARY

(MUHAMMAD NASIR KHAN)  
SECTION OFFICER PRIMARY

ATTEST

GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Dated Peshawar, the, October 8, 2010

NOTIFICATION

Consequent upon the recommendations of Khyber Pakhtunkhwa Public Service Commission Peshawar, the Competent Authority is pleased to appoint the following Subject Specialists (Female) in the relevant subjects to BS-17 (Rs. 9850-740-24650) plus G.S.P. wherever admissible under the rules on regular basis under the existing policy of the Provincial Government:-

- | Sr# | Name/Father's Name & Address  |
|-----|---|
| 1.  | Ms. Javria Zakir D/O Zakir Hussain Shah Village: Sultanpur P.O. Havelian Cant. Teh: Havelian Distt. Abbottabad.                                 |
| 2.  | Ms. Salma Gul D/O Said Muhammad House No. 47/B Mohallah Rabnawaz Railway Road Bannu   |
| 3.  | Ms. Tazeem Akhtar D/O Mustafa Khan C/O Shahidullah House No. 11 Officer Colony Miranshah Road Bannu   |
| 4.  | Ms. Mehrun Nisa D/O Siraj U. Rehman Village: Kaniwer P.O. & Teh. Tangi Distt. Charsadda   |
| 5.  | Ms. Uzma Khattak D/O Abdul Qayyum Khattak House No. 89 Officer Colony No. 1 Manki Road Nowshera   |
| 6.  | Ms. Sajma Shaheen D/O Ghulam Farid Model Town P.O. Murza D. Khan  |
| 7.  | Ms. Haleema D/O Amir Muhammad Village & P.O. Jamal Khan Mohallah Khan Distt. & Tehsil Mardan  |
| 8.  | Ms. Safina Hayat D/O Khizar Hayat C/O Shah Niaz Khan near Union Council Vill. & P.O. Zabar Ahmad Khan Bannu                                     |
| 9.  | Ms. Zaneera Hayat D/O Hayatullah Village & P.O. Prang Yasin Zai Tehsil & Distt. Charsadda   |
| 10. | Ms. Nusrat Mehreen D/O Muhammad Nawaz Khan House No. 352/B inside Hinjal Gate Bannu City  |
| 11. | Ms. Ambreen Gul D/O Inayatullah Khan At Shafiq Printing near Saleem Theater Tanchi Bazar Bannu City   |
| 12. | Ms. Bushra D/O Muhammad Azeem Afridi H.No. 2 St. No. 13 Rahatabad Opposite Forest College Peshawar  |
| 13. | Ms. Munaza Hassan D/O Muhammad Hassan Headmaster Mohallah Upper Jabri Near GPO Masjid-e-Aqsa Mansehra   |
| 14. | Ms. Tehmina Hanan Lodhi D/O Abdul Hanan Lodhi H. No. AC/1792 Mohallah Lohan Banda Mansehra  |
| 15. | Ms. Pariwash D/O Pir Ahmad Shan Pariwash C/O Rizal S/O Gul Fardin Leather Merchant Main Bazar Takht Bhai Marda                                  |
| 16. | Ms. Humaira Saeed D/O Muhammad Saeed House T-304 Mohallah Garhi Dhoh-e-Wal Kohat City   |
| 17. | Ms. Samina D/O Fazal Mahmood House No. 174/A Gharib Abad No. 7 Supply Deppt near City Railway Station Peshawar                                  |
| 18. | Ms. Zobia Afshen D/O Ghulam Farid Flat Inabal Karim Market, Bashed Town Ishrat Cinema Road Gulbahar No. 3 Peshawar                              |
| 19. | Ms. Najma Shaheen D/O Fird Muhammad Mohallah Shoozi Khel near old DGQ Hospital Karak Teh. & Distt Karak.  |
| 20. | Ms. Mehmooda Kanwal D/O Iltaf Muhammad (Rtd.) H/Lt C/O Imtiaz General Store Paracha Town near Grid Station Pindi Road Kohat                     |
| 21. | Ms. Shaheena Anjum D/O Murad Ali Khan Village & P.O. Sudher Teh. Chota Lahor Distt. Swabi   |
| 22. | Ms. Iram Saidu D/O Saidu Khan House No. T/577, Garden Colony Behzadi Chickerkot Kohat   |
| 23. | Ms. Kausar D/O Muhammad Hilal Quarter No. C-74 College Colony Saidu Sharif Swat.  |
| 24. | Ms. Nasreen Yousaf D/O Yousaf Khan Mujeeb Rasool Karyana Marchent Main Bazar Lakki Marwa  |
| 25. | Ms. Fatima Gul D/O Fazal Amir Village & P.O. Dargah Mohallah Kohi Chum/Swati Chum Malakand Agency   |
| 26. | Ms. Qamar Sultana D/O Saeed Khan C/O Prof. Nadeem Khan Baitani Govt. College Peshawar   |
| 27. | Ms. Nabila Niswazi D/O Muhammad Nawaz Village & P.O. Tangri Bala Teh. & Distt. Mansehra   |
| 28. | Ms. Farheen Hayat D/O Muhammad Hayat Khan House No. 10/D inside Phoori Gate Bannu City  |
| 29. | Ms. Farid Fatima D/O Sanat Shah C/O Naeem Khan House No. 118 B-Street No. 3 (Post office street) Sector No. 4 Kohat Development Authority Kohat |
| 30. | Ms. Nusrat-un-Nisa Khan D/O Dr. Mir Ghulam Khan C/O Siraj Medical Complex North West Circular Road D.I. Khan.                                   |
| 31. | Ms. Salma Rehman D/O M. Saeed ur Rehman House No. 019 Mohallah Momin Town Muhammad Street 1-A Dalazak Road Pesh.                                |
| 32. | Ms. Huma Tabassum D/O Muhammad Hunayun Mohallah Singhlian Vill. & P.O. Dhuntoor Teh. & Distt. Abbottabad  |
| 33. | Ms. Sabil-a Naz D/O Shams-ur-Rehman Mohallah Bazed Khel Village & P.O. Saleem Khan Tehsil & Distt. Swabi  |
| 34. | Ms. Samina Arshid D/O Arshid Mehmood C/O Arshid Mehmood Agency Karosine Oil Haripur Road Havelian Distt. Abbottabad.                            |
| 35. | Ms. Samaira Mehmood D/O Shah Mahmood House No. 102 Sector No. 2 Sector N/2 Phase 4 Hayatabad Peshawar   |
| 36. | Ms. Aisha Zeb D/O Jehan Zeb Village & P.O. Agra Payan Distt. & Teh. Charsadda.  |
| 37. | Ms. Tahira Jubeen C/O Muhammad Yaqoob Khan Village & P.O. Kalog Teh. & Distt. Haripur   |

APPROVED

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

Dated Peshawar the, October 8, 2010


**NOTIFICATION:**

No.SO(S)3-2/2004/(Female). Consequent upon the recommendations of Khyber Pakhtunkhwa Public Service Commission, Peshawar the competent Authority is pleased to appoint the following subject specialists (Female) in the relevant subjects in BS-17 (Rs.9850-740-24650) (sic) permissible under the rules on regular basis under the existing policy of the Provincial Government.

S#	Name/Father's Name & Address
1.	Ms. Javeria D/o Zakir Hussain Shah Village Sultanpur P.O Havelian Cantt. Tehh Havelian Distt. Abbottabad
2.	Ms. Salam Gul D/o Said Muhammad House No.47/B Mohallah Rabnawaz, Railway Road, Bannu.
3.	Ms. Tazeem Akhtar D/o Mustafa Khan C/o Shahid Ullah House No.11 Officer Colony Miranshah Road, Bannu
4.	Ms. Mehrun Nisa D/o Sira-ur-Rehman Village Kaniwer P.O & Teh. Tangi Distt. Charsadda
5.	Ms. Uzma Khattak D/o Abdul Qayyum Khattak House No.89 Armour Colony No.2 Manki Road, Peshawar
6.	Mr. Saima Shaheen D/o Ghulam Farid Model Town, P.O Muryali D.I. Khan
7.	Ms. Haleema D/o Amir Muhammad Village & P.O Jamal Ghari, Mohallah Khan Distt & Tehsil Mardan
8.	Mst. Safina Hayat D/o Khizar Hayat C/o Shah Niaz Khan near Union Council Vill & P.O Bazar Ahmad Khan Bannu
9.	Ms. Zoneera Hayat D/o Hayatullah Village & P.O Prang Yasin Zai Tehsil & Distt: Charsadda
10.	Ms. Nusrat Mehreen D/o Muhammad Nawaz Khan House No.352/B Inside Hinjal Gate Bannu City
11.	Ms. Ambreen Gul D/o Inayatullah Khan Al-Shafaqat Panter, near Saleem Threater Tanchi Bazar Bannu City.
12.	Ms. Bushra D/o Muhammad Azeem Afirid House No.25 No.13 Rahatabad Opp: Forest College Peshawar.
13.	Ms. Munaza Hassan D/o Muhammad Hassan Headmaster, Mohallah Upper Jabri near GPO Masjid-e-Aqsa Mansehra.
14.	Ms. Tehmina Hanan Lodhi D/o Abdul Hanan Lodhi House No.AC/1792 Mohallah Lohar Banda Manseh
15.	Ms. Pariwash D/o Pir Ahmad Shah Parwash C/o Riaz s/o Gul Fadin Leather Merchant Mian Bazar Takht Bhai Mardan
16.	Ms. Humaira Saeed D/o Muhammad Saeed House No.1304 Mohallah Garhi Dhoh-e-wal Kohat City.
17.	Ms. Sabiha D/o Fazal Mahmood house No.174/A Gharib Abad No.2, Supply depot near City Railway Station Peshawar.
18.	Ms. Zobia Afsheen D/o Ghulam Farid, Flat Sabal Karim Market, Rasheed Town, Ishrat Cinema Road, Gulbahar No.3 Peshawar
19.	Ms. Najma Shaheen D/o Eid Muhammad Mohallah Shoozi Khel near old DGQ Hospital Karak Tehsil & District Karak.
20.	Ms. Mehmoona Kanwal D/o Iltaf Muhammad (Rtd). H/Lt C/O Imtiaz General Store Paracha Town, near Grid Station Pindi Road, Kohat.

*Attest*  
*Ku*

21.	Ms. Shaheena Anjum D/o Murad Ali Khan Village & P.O Sudher The. Chota Lahore District, Swabi
22.	Ms. Iram Saidal D/o Saidal Khan House No.T/577, Garden Colony Behzadi Chikerkot Kohat
23.	Ms. Kausar D/o Muhammad Hilal Quarter No.C-74 College Colony Saidu Sharif Swat.
24.	Ms. Nasreen Yousaf D/o Yousaf Khan Mujeeb Rasool Karyana Marchent Main Bazar Lakki Marwat
25.	Ms. Fatima Gul D/o Fazal Amir Village & P.O Dargai Muhallah Kohi Chum/Swati Chum Malakand Agency
26.	Ms. Qamar Sultana D/o Saeed Khan C/o Prof. Nadir Khan Bettani Govt. College Peshawar
27.	Ms. Nabila Nawaz D/o Muhammad Nawaz Village & P.O Tarangri Bala Teh & Distt: Mansehra
28.	MS. Fareeha Hayat D/o Muhammad Hayat Khan House No.10/D Inside Phoori Gate, Bannu City.
29.	Ms. Farid Fatima D/o Sanat Shah C/o Naeem Khan house No.118-B, Street No.3 (post office, sector No.4, Kohat Development Authority Kohat)
30.	Mst. Nusrat-un-Nisa Khan D/o Dr. Mir Ghulam Khan C/o Siraj Medical Complex North West Circular Road D.I. Khan
31.	Ms. Salma Rehman D/o M. Saeed-ur-Reman, house No.019 Mohallah Momin Town, Muhammad Street 1-A, Dalazak Road, Peshawar.
32.	Ms. Huma Tabbasum D/o Muhammad Hamayun, Mohallah Singillina, Vill & P.O Dhumtoor Teh & Distt Abbottabad
33.	Ms. Sabiha Naz D/o Shams-ur-Rehman, Mohallah Bazed Khel Village & P.C. Saleem Khan Tehsil & District Swabi
34.	Ms. Samina Arshid D/o Arshid Mehmood C/o Arshid Mehmood Agency Karosine Oil Haripur Road, Havilian District Abbottabad
35.	Ms. Sumaria Mahmood, D/o Shah Mahmood, House No.102, Street No.2, Sector N/2, Phase-4, Hayatabad Peshawar
36.	Ms. Aisha Zeb D/o Jehan Zeb, Village & P.O Agra Payan Distt: & Teh Charsadda
37.	Ms. Tahira Jabeen D/o Muhammad Yaqoob Khan, Village & P.O Kaileg Teh & Dis: Haripur

Attest  


The Competent Authority is further pleased to appoint & post the following candidates recommended by Khyber Pakhtunkhwa Public Service Commission, who were already appointed contract and subsequently regularized as under:-

S.No.	Name/Father's Name & Address	Proposed place of posting	Remarks
1.	Ms. Abida D/O Kachkol Khan Village & P.O. Thana Malakand	Subject Specialist History-cum-Civics (BS-17) GGHSS Ouch Dir Lower	Post already occupied by her on regularization from contract.
2.	Ms. Seema D/O Farmanullah Mohallah Zafar Park Batkhela Malakand	Subject Specialist English (BS-17) GGHSS Manglore Swat	-do-
3.	Ms. Atiya D/O Ghulam Rehmani C/O Abdul Amin & Sons Rice Dealer Main Bazar Batkhela Malakand	Subject Specialist Economics (BS-17) GGCMHSS Timergara Dir Lower	-do-
4.	Ms. Anjeela Kausar D/O Hafiz Fazal Rouf, Afzal Imam Colony Pat Baba Road Takht Bhai Mardan	Subject Specialist Statistics (BS-17) GGHSS Shakardara Kohat	-do-
5.	Ms. Shaista Zeb D/O Abdul Hakam Mohallah Dheriser Vill. & P.O Murgluz Teh. & Distt. Swabi	Subject Specialist Biology (BS-17) GGHSS Kota Swabi.	-do-
6.	Ms. Jehan Ara Gui D/O Muhammad Bahadar Khan Vill. & P.O Kalabat Tehs. & Distt. Swabi	Subject Specialist Biology (BS-17) GGHSS Lahor Swabi	-do-
7.	Ms. Atliya Faizi D/O Inayatullah Faizi Village Salim Tehsil Mastuj Distt. Chitral	Subject Specialist Chemistry (BS-17) GGHSS Barwal Bandi Dir Upper	-do-
8.	Ms. Bibi Zuhra D/O Toti Rahmat Mohallah Sherzada Khan Tal Chowk Mingora Swat	Subject Specialist Chemistry (BS-17) GGHSS Manglore Swat	-do-
9.	Ms. Zaib-un-Nisa D/O Payo Dar Khan C/O Payo Dar Khan SET, GHSS Togh Bala Kohat	Subject Specialist Chemistry (BS-17) GGHSS Teri Karak	-do-
10.	Ms. Shahida D/O Amanullah Kulachi House South Circular Road D.I. Khan	Subject Specialist Chemistry (BS-17) GGHSS Kulachi D.I. Khan	-do-

TERMS & CONDITIONS

1. Their services will be considered regular but without Pension & Gratuity in terms of Section-19 of the NWFP Civil Servant Act, 1972 as amended vide NWFP Civil Servants (Amendment) Act, 2005. They will however be entitled to Contributory Provident Fund in such a manner and at such rates as prescribed by the Government.
2. The Subject Specialists who are already in Government Service and working against pensionable posts on regular basis before 31st day of July 2001, without any service break, on application to Khyber Pakhtunkhwa Public Service Commission through proper channel and selection by the Commission are appointed and allowed choice of option either to retain benefit of pension & gratuity as allowed to them under their previous terms of appointment or to avail the benefit of Contributory Provident Fund allowed to them under new appointment.
3. Their services are liable to termination on one month's notice from either side. In case of resignation without notice their one month pay/allowances, shall be forfeited to the Government.
4. The appointees should join their posts within 30 days of the issuance of this notification. The Director, EPSE Peshawar would furnish a certificate to the effect that the candidates have joined the posts otherwise after one month of the issuance of this Notification, failing which their candidature will expire automatically and no subsequent appeal etc shall be entertained.
5. They would be on probation for a period of one year extendable to another one year.

ATTESTED

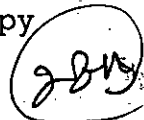
3. The competent Authority is further pleased to appoint and post the following candidates recommended by Khyber Pakhtunkhwa Public Service Commission, who were already appointed contract and subsequently regularized as under;-

S#	Name/Father's Name & address	Proposed place of posting	Remarks
1.	Ms. Abida D/o Kachkol Khan Village & P.O Thana Malakand	Subject Specialist History-cum-Civics (BS-17) GGHSS Ouch Dir Lower	Post already occupied by her (sic) regularization from contract.
2.	Ms. Seema D/o Farmanullah Mohallah Zafar Park, Batkhela, Malakand	Subject Specialist English (BS-17) GGHSS Manglore Swat	-do-
3.	Ms. Atiya d/o Ghulam Rehmani C/o Abdul Amin & Sons Rice Dealer Main Bazar, Batkhela Malakand	Subject Specialist Economics (BS-17) GGCMHSS Timergara Dir Lower	-do-
4.	Ms. Aneela Kausar D/o Hafiz Fazal Rouf, Afzal Imam Colony Pat Baba Road, Takht Bhai Mardan	Subject Specialist Statistics (BS-17) GGHSS Shakardar Kohat	-do-
5.	Ms. Shaista Zeb D/o Abdul Hakam Mohallah Dheriser Vill & P.O Marghuz Teh & Distt. Swabi	Subject Specialist Biology (BS-17) GGHSS Kota Swabi	-do-
6.	Mst. Jehan Ara Gul d/o Muhammad Bahadar Khan Vill. & P.O Kalabat Tehs & District Swabi	Subject Specialist Biology (BS-17) GGHSS Lahore Swabi	-do-
7.	Mst. Attiya Faizi D/o Inayaullah Fazia Village _____ Tehsil Mastaj Distt: Chitral	Subject Specialist Chemistry (BS-17) GGHSS Barwal Bandi Dir Upper	-do-
8.	Mst. Bibi Zuhra D/o Toti Rahman Mohallah Sherzada Khan Taj Chowk, Mingora Swat	Subject Specialist Chemistry (BS-17) GGHSS Manglore	-do-
9.	Ms. Zaib-un-Nisa D/o Payo Dar Khan C/o Payo Dar Khan SET, GHSS, Tough Bala Kohat	Subject Specialist Chemistry (BS-17) GGHSS Teri Karak	-do-
10.	Ms. Shahida d/o Amanullah Kulachi House South Circular Road, D.I.Khan	Subject Specialist Chemistry (BS-17) GGHSS Kulachi D.I.Khan	-do-

#### TERMS & CONDITIONS:

1. Their services will be considered regular but without Pension & Gratuity in terms of Section-19 of the NWFP Civil Servant Act, 1973 as amended vide NWFP Civil Servants (Amendment) Act, 205. They will

*Attayed*  
*K*



however be entitled to Contributory Provident Fund in such a manner and at such dates as prescribed by the Government.

2. The subject specialist who are already in Government Service and working against pensionable posts on regular basis before 1<sup>st</sup> day of July 2001, without any service break, on application to Khyber Pakhtunkhwa Public Service Commission through proper channel and selection by the Commission are appointed and allowed choice of option either to retain benefit of pension & gratuity as allowed to them under their previous terms of appointment or to avail the benefit of Contributory Provident Fund allowed to them under new appointment.
3. Their services are liable to termination on one month's notice from either side. In case of resignation without notice their one month pay/allowances, shall be forfeited to the Government.
4. The appointees should joint their posts within 30 days of the issuance of his notification. The Director, E&SE Peshawar would furnish a certificate to the effect that the candidate have joined the posts otherwise after one month of the issuance of this notification, failing which their candidate will expire automatically. will expire automatically and no subsequent appeal etc shall be entertained.
5. They would be on probation for a period of one year extendable for another one year.

Albert  
Bun



7. Their services can be terminated at any time, in case their performance is found unsatisfactory during probation period.
8. Charge report should be submitted to all concerned.
9. No TA/DA will be allowed to the appointees for joining their duty.

SECRETARY TO GOVT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

ENDST. OF EVEN NO. & DATE

Copy forwarded for information & necessary action to:

- 1- Accountant General, Khyber Pakhtunkhwa Peshawar.
- 2- Director, E&SE, Peshawar.
- 3- Director, Curriculum & Teacher Education Abbottabad.
- 4- Director of Education PATA Peshawar.
- 5- EDOS, E&SE Concerned.
- 6- District Accounts Officers Concerned.
- 7- Director Recruitment, Khyber Pakhtunkhwa Public Service Commission, Peshawar.
- 8- Principal Concerned.
- 9- PS to Minister for Education E&SE, Khyber Pakhtunkhwa.
- 10- PS to Chief Secretary, Khyber Pakhtunkhwa.
- 11- PS to Secretary, E&SE Department.
- 12- Officers Concerned.
- 13- Office order file.

(Synd Ahmad Khan)  
SECTION OFFICER (SCHOOLS).

KC  
ATTESTED

3



District Education Officer Female Chitral.

STATEMENT SHOWING THE DISTRICT WISE DETAIL OF VACANT POSTS OF MALE/FEMALE AS STOOD ON 25.01.2016

S.N No.	Name of School	H-20		Princip at H-19		Princip at H-18		Headmast er H-17		SS H-18		SS H-17		DPH H-17		Librar ian H- 17		IT H- 17		SSI H/o Chem H- 16		SST Maths Phy H.		SST Gener al H-16		IT H-16		Total		Total
		M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	
1	GGHS Beye				1																								1	2053
2	GGHS Anni				1																								1	2053
3	GGHS Pesh				1																								1	2053
4	GGHS Bokul					1																							1	2053
5	GGHS Mustaf					1																							1	2053
6	GGCMS Damin							1																					1	2053
7	GGHS Singhore							1																					1	2053
8	GGHS Garani Chashma							1																					1	2053
9	GGHS Anai Bokul							1																					1	2053
10	GGHS Koshi							1																					1	2053
11	GGHS Warijan							1																					1	2053
12	GGHS S. gram							1																					1	2053
13	GGHS Warkup							1																					1	2053
14	GGHS Khat							1																					1	2053
15	GGHS Deep							1																					1	2053
Total Vacancies		0	0	0	3	0	2	0	10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	15	2053

District Education Officer  
Female Chitral

Latest e. mail on 25-1-16  
Sent by DEO Chitral.  
(F)

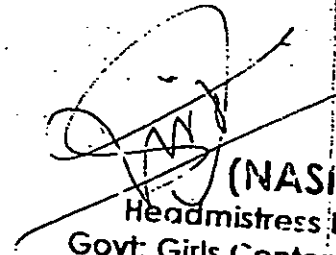
*[Handwritten Signature]*  
ATTN: DEO



GOVERNMENT OF KHYBER PAKHTUNKHWA

CHARGE ASSUMPTION REPORT

in compliance with the Order of Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department Notification No. SO (F/E)/2-6/DPC Meeting (13/12/2015) Promote from SST (BS-16) To the Post of Headmistress (BS-17) on regular basis Dated Peshawar the 17-03-2016, at serial No. 85. I assumed the charge of the Post of Headmistress, in BPS-17, Office of the Govt. Girls Centennial Model High School, Denin Chitral today on 17-03-2016 (F/noon).

  
(NASIRA BATOOL)  
Headmistress BPS-17 (Regular)  
Govt. Girls Centennial Model High  
School Denin Chitral

OFFICE OF THE HEADMISTRESS GOVT. GIRLS CENTENNIAL MODEL  
HIGH SCHOOL DENIN DISTRICT CHITRAL

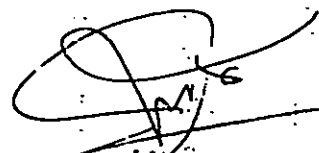
No. 756-51

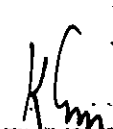
Dated 17<sup>th</sup> March 2016.

Copy Forwarded to the:-

1. Director E&SE Khyber Pakhtunkhwa, Peshawar.
2. PS to Secretary E&SE Department Khyber Pakhtunkhwa.
3. District Education Officer (Female) Chitral.
4. District Accounts Officer Chitral.
5. District "EMIS" DEO Female Office Chitral.
6. Office file.

For Information And necessary action please.

  
Headmistress  
Govt. Girls Centennial Model High  
School Denin Chitral

  
ATTESTED

GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Dated Peshawar January 24, 2011

NOTIFICATION

NO.SC(S/P)E&S/14-16/2011/Attia Faizi SS: Ms. Attia Faizi Subject Specialist Chemistry  
(BS-17) working as Instructor RTE (N) Distt. Chitral is hereby transferred and adjusted as  
Headmistress (BS-17) (wrong posting) a. GGHS Danian, Chitral against Ms. Samira Jehan, due  
for promotion (BS-17 to BS-18) as and when the post get vacant, in the interest of public service  
with immediate effect.

2. No TA / DA allowed.

SECRETARY

End of even No & date

Copy forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE, Peshawar.
3. Director DCIE Khyber Pakhtunkhwa, Abbottabad.
4. District Education Officer (F) Chitral.
5. District Accounts Officer Chitral.
6. Incharge EMIS, E&SE Department.
7. Officer concerned.
8. Other order file.

(FOZIA NAZ)  
SECTION OFFICER (S/P)

ATTESTED

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Q-AD-CP

70

A.T.M. 9  
(See Para 59, Audit Manual)

PAY SLIP

OFFICE OF THE ADAO *chitral*.

No. .... the ..... 19 .....

*Mst. Nasir Baitool H.K. B-17*

*Q.C.M.H.S. Dera chitral.*  
(20630-155-57780) he is entitled to draw pay and allowances at the monthly rates shown below from the dates specified less already drawn :-

Detail of calculation

	From	From	From	From
Substantive Pay	17-3-76			
Pay =	48670			
Officiating pay				
HRA =	7055			
Overseas pay				
CHA =	100			
Special pay				
CA =	5000			
Indexed Pay				
LIAR =	4500			
MA =	2373			
AR 50%	8995			
AR 13	5101			
AR 14	3400			
Total	AR 15	4867		

*All deduct in the financial year.*

*Attd: District Accounts Officer*

*Rs. 86960/-*

*Attested*

30

30

Chitral

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION NWFP PESHAWAR

NOTIFICATION

In pursuance of instructions/ Job Manual of Subject Specialists (SS) in NWFP issued vide this office letter No. 19-14-94 dated 24.10.2008.

It is hereby notified for the information and strict compliance by all the EDOs (E&SE) in NWFP that henceforth the powers of Drawing & Disbursing Officers (DDO) should not be delegated/assigned to the Subject Specialist (SS) working in their respective District. The Subject Specialist is supposed just to adhere to his/her own job description already notified by this office referred to above.

Likewise, SETs/ADOs (M&F) are not authorized to act as Drawing & Disbursing Officers. Only Headmaster/Headmistress/Principals in BPS-17 (Regular) should be assigned the powers of DDOs in future. In case of non availability of Headmaster/Headmistress/Principals in the concerned school due to any reason, the Headmaster/Headmistress/Principals having B-17 (Regular) & above of the neighboring/adjacent schools should be assigned the powers of DDO.

All EDOs (E&SE) in NWFP are directed to withdraw/cancel the powers of Drawing & Disbursing Officers (DDOs) if already assigned to the SS/SET/ADO (M&F) in their respective District.

The above instructions should be followed in the letter & Spirit.

(Directress)

Dated Pesh: the 2-4 /10.

File No. 100-31

Copy of the above is forwarded for information & necessary action to the:-

- 1. All Executive District Officers (E&SE) in NWFP.
- 2. PS to Minister for (E&SE) NWFP Peshawar.
- 3. PA to Director (E&SE) NWFP Peshawar.
- 4. PA to Addl: Director (Estt:) Local Directorate.
- 5. PA to Addl: Director (P&D) Local Directorate.

*[Signature]*  
 Deputy Director (P&D)  
 (E&SE) NWFP Peshawar.

*[Signature]*  
 ATTENDED

(35) 33 (10)

GOVERNMENT OF THE NORTH-WEST FRONTIER PROVINCE  
SCHOOL AND LITERACY DEPARTMENT.

NOTIFICATION

Peshawar, dated the April, 09, 2004.

No. SOG/S&LD/1-28/2003/Vol.II. The appendix attached with this Department Notification No. SOG/S&LD/1-28/2003/VOL.II dated 30-03-2004 is hereby substituted with the final/revised appendix dated 8-04-2004 and shall always be deemed to have been so substituted.

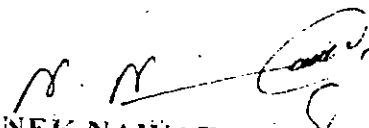
Secretary to Govt: of NWFP  
Schools & Literacy Department

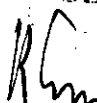
Encls: No. SOG/S&LD/1-28/2003/Vol.II.

Dated April 09, 2004.

A copy is forwarded to:

1. All Administrative Secretaries to Govt: of NWFP.
2. Secretary to Governor, NWFP.
3. Secretary to Chief Minister, NWFP.
4. Chairman, Public Service Commission, NWFP, Peshawar.
5. All Directors in Schools & Literacy, in NWFP.
6. All District Coordination Officers, in NWFP.
7. All Executive District Officer, (S&L) in NWFP.
8. Director Information, NWFP, with the request to give wide publicity.
9. The Manager, Govt. Printing Press Peshawar for publication in the next issue of Govt: Gazzette.
10. PS to Minister for Education NWFP.
11. PS to Secretary to Govt: of NWFP, Schools & Literacy Department.
12. PA to Additional Secretary/Deputy Secretary, S&L Deptt: GoNWFP.
13. All Section Officers/Planning Officer, S&L Deptt: GoNWFP.

  
(NEK NAWAZ KHAN)  
SECTION OFFICER (GENERAL)

  
**ATTESTED**

36

<p>Headmaster Government High School and other equivalent posts in the Teaching Cadre.</p>	<p>Master's Degree with B.Ed/M Ed/M.A (Education) or equivalent qualification from a recognized University and five years teaching experience in High Middle Schools owned or recognized by the Government.</p>	<p>(a) Eighty per cent by promotion on the basis of seniority-cum-fitness from amongst the Senior English Teachers with five years service as such and (b) Twenty per cent by initial recruitment.</p>
<p>15. Subject Specialist Government Higher Secondary Schools Government Comprehensive High Schools and other equivalent posts in the Teaching Cadre.</p>	<p>(i) Master's Degree in the relevant subject with Bachelor of Education or M Ed. or Master of Education (Industrial Arts or Business Education) or M.A. Education or equivalent qualification from a recognized University; or  (ii) If no suitable candidate possessing the above qualification is available, a candidate possessing Master's Degree in the relevant subject may be appointed as Subject Specialist subject to the condition that he shall acquire the requisite qualification as specified above within three years from the date of his appointment, failing which his service will be terminated without notice irrespective of any provision of the rules for the time being in force. <u>Note:</u> The person appointed as Subject Specialist shall be transferable only to a post relevant to his subject.</p>	<p>By initial recruitment.</p>

K...  
 ATTESTED

Final 8<sup>th</sup> April, 2004



<p>Headmaster Government High School and other equivalent posts in the Teaching Cadre</p>	<p>Master's Degree with B.Ed, M.Ed M.A (Educator) or equivalent qualification from a recognized University and five years teaching experience in High Middle Schools owned or recognized by the Government.</p>	<p>25-40</p>	<p>(a) Fifty percent by promotion on the basis of seniority-cum-fitness from amongst the Senior English Teachers with five years service as such and  (b) Twenty Percent by initial recruitment.</p>
<p>Subject specialist Government Higher Secondary Schools Government Comprehensive High Schools and other equivalent posts in the Teaching Cadre</p>	<p>i) Master's Degree in the relevant subject with Bachelor of Education or M.Ed or Master of Education (Industrial Arts or Business Education) or M.A Education or equivalent qualification from a recognized University or  ii) If no suitable candidate possessing the above qualification is available a candidate possessing Master's Degree in the relevant subject may be appointed as Subject Specialist subject to the condition that he shall acquire the requisite qualification as specified above within three years from the date of his appointment, failing which his service will be terminated without notice irrespective of any provision of the rules for the time being in force.  NOTE: The person appointed as subject specialist shall be transferable only to a post relevant to his subject.</p>	<p>25-40</p>	<p>By initial recruitment</p> <p style="text-align: right;"><i>Allywood</i> <i>Ali</i></p>

ATTESTED

*[Handwritten signature]*



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227

49

226

15-1437

2016

22-2016

12-22

ABC CERTIFIED

**DAILY MASHRIQ PESHAWAR**

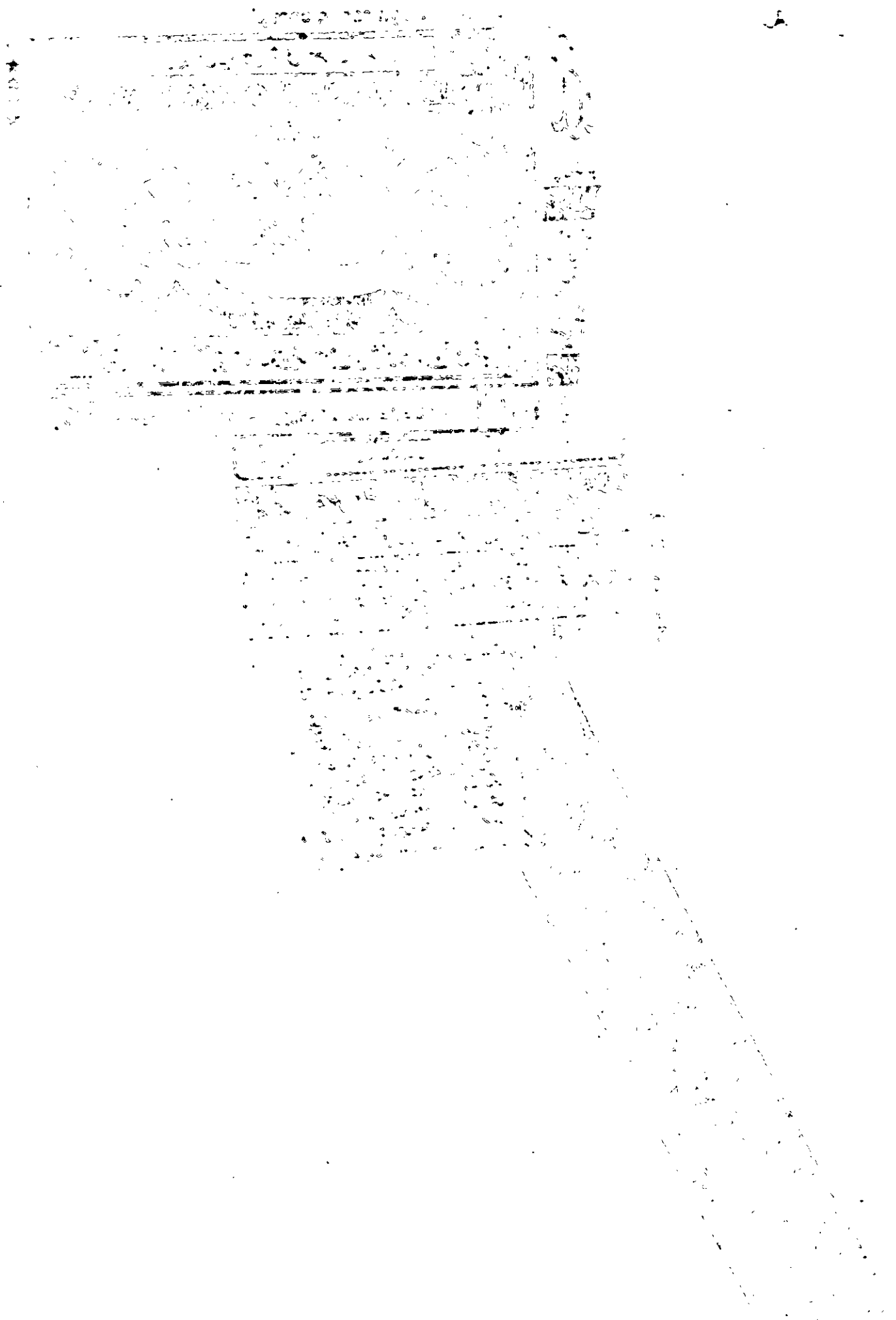
www.daily Mashriq.com.pk

http://www.daily Mashriq.com.pk



37







پشاور ایٹ آف اسلام آباد اور کراچی سے: ایک وقت شائع ہو جو بالاکثیر الاشاعت: قومی روزنامہ

روزنامہ

پشاور  
پاکستان

عبدالواحد پوری

صفحہ 14

جلد 27 ہفتہ 30 اپریل 2016-22 جب الحجب 1437۔ جرت 12 بجے۔ بولے ہی اڈہا شماره 112



**عمر حلق، سرکاری اداروں، پانچ روز کے اندر کارٹریاں، اپس لینے کا حکم**

سولائی حکموں میں تمام انکوائریاں تین ہفتے کے اندر مکمل کرنے کی سرکار نے ہائرمین کی ان کی اصل آسانی پر تعیناتی کے احکامات

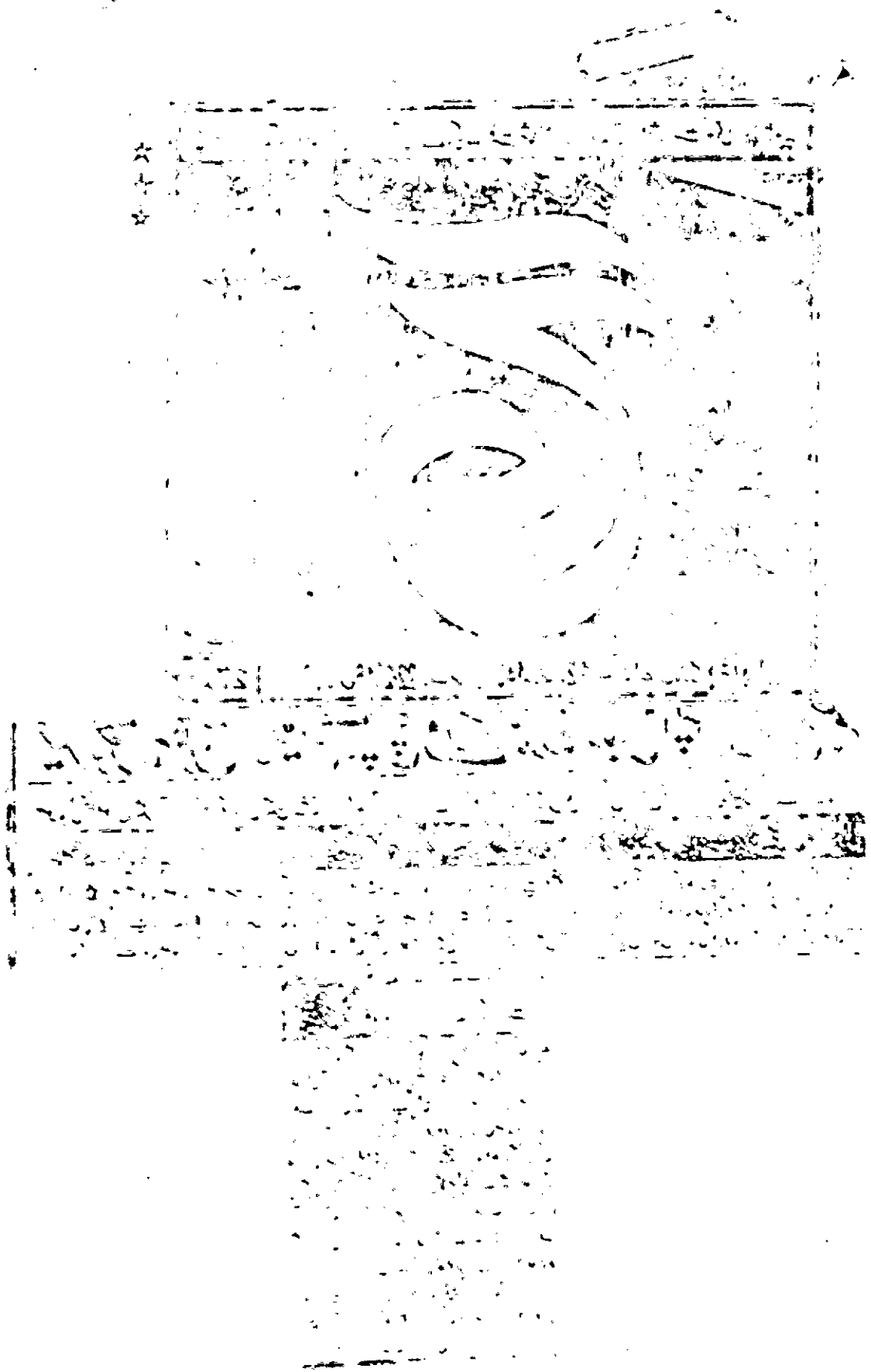
پشاور (خبر نگار خصوصی) سولائی حکومت نے نئے سرکاری ہائرمین سے سرکار نے ہائرمین کی ان کی اصل آسانی پر تعیناتی کے احکامات... اس میں 10 بجے 85

**حکومت احکامات**

85


پس اپس میں لینے کے لیے سرکار نے ہائرمین کی ان کی اصل آسانی پر تعیناتی کے احکامات... اس میں 10 بجے 85

ATTESTED



**SERVICE CERTIFICATE**

It is to certify that Mr. Essa Muhammad S/O Muhammad Kabir has been serving in Elementary & Secondary Education Department since 08-12-1983. He is still in service and presently working as Head Master BPS-17 at Govt High School Kuju Tehsil & District Chitral.

  
District Education Officer (Male)  
Chitral

  
ATTESTED

Anna (H)

(40) (1)

Chitral

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION NWFP PESHAWAR

NOTIFICATION

In pursuance of instructions/ Job Manual of Subject Specialists (SS) in NWFP issued vide this office letter No. 1944-94 dated 24.10.2008.

It is hereby notified for the information and strict compliance by all the EDOs (E&SE) in NWFP that henceforth the powers of Drawing & Disbursing Officer (DDO) should not be delegated/assigned to the Subject Specialist (SS) working in their respective District. The Subject Specialist is supposed just to adhere to his/her own job description already notified by this office referred to above.

Likewise, SETs/ADOs (M&F) are not authorized to act as Drawing & Disbursing Officers. Only Headmaster/Headmistress/Principals in BPS-17 (Regular) should be assigned the powers of DDOs in future. In case of non availability of Headmaster/Headmistress/Principals in the concerned school due to any reason, the Headmaster/Headmistress/Principals having B-17 (Regular) & above of the neighboring/adjacent schools should be assigned the powers of DDO.

All EDOs (E&SE) in NWFP are directed to with draw/cancel the powers of Drawing & Disbursing Officers (DDOs) if already assigned to the SS/SET/ADO (M&F) in their respective District.

The above instructions should be followed in the letter & Spirit.

(Directress)

Dated Pesh: the 24 / 10.

Encl: No. 203-31

Copy of the above is forwarded for information & necessary action to the:-

1. All Executive District Officers (E&SE) in NWFP.
2. PS to Minister for (E&SE) NWFP Peshawar.
3. PA to Director (E&SE) NWFP Peshawar.
4. PA to Addl: Director (Estt:) Local Directorate.
5. PA to Addl: Director (P&D) Local Directorate.

ATTESTED

Deputy Director (E&SE) NWFP Peshawar

Telephone No. 3612

Amra (U) (1) (2)

DIRECTORATE OF EDUCATION, EXTENSION, DEVELOPMENT AND EXERCISES, NWFP, (P.O. HANJALAH, SEHRANA ROAD, ABBOTABAD)

No. 9066-90 /Estt:Branch/II-AE Dated 1. Abad. the 30. 8. 1975

To

- 1- Chief Instructor, Education Extension Centre NWFP, Abbotabad.
- 2-24- All the Principals, Govt. College of Education for Elementary Teachers (NWFP) In-Ser./Pro-Ser. in N.W.F.P.
- 25- Principal, Govt. Agro-Technical Teachers Centre Peshawar.
- 26- Principal, College of Physical Education Dera (Kohat)

Subject: - POSTING OF HUSBAND AND WIFE AT ONE STATION.

Reference Govt. of NWFP Services and General Adm. Deptt. No. SORI(S&GAD)5-27/95 dated 9th July, 1975 and instructions from former West Pakistan S&GAD department vide Circular No. SORI(S&GAD)2-127/61 dated 5.2.62 and No. SORI(S&GAD)2-127/61 dated 16.7.68.

The NWFP Assembly in its session dated 28.12.1973 had also unanimously adopted a resolution to the effect that the wives and husband who are employed in different schemes should be posted in the same District so that their homes are not divided and there is no adverse effect on Edu. and training of their children. In view of the above it is requested to please intimate the particulars of such husbands and wives who both are serving either in Govt. Departments or in the Autonomous/semi-Autonomous bodies and are presently posted at one and the same station or within the same District. Also the details of such husband and wives who are not posted at one place or within the same District may be indicated.

It is requested that above information may kindly be supplied to this Office immediately on the same in required intimation with or Assembly Question.

Subject Specialist-IV  
For/- Director.

Endst: No. 9091 /Estt: Branch/II-AE. Dated 30. 8. 1975

Copy to the Section Officer (General) Govt. of NWFP Education Department Peshawar No. SO(G)/ED/6-47/95 dated the 27th July, 1975 or No. SO(G)/ED/6-47/4.11/95 dated 16.8.95 for information please.

Subject Specialist-IV  
For/- Director.

ATTESTED



Annex (J)

12-399

http://www.daily-mashriq.com.pk

اللہ تعالیٰ کیلئے ہیں مشرق، مشرب، انفرآن

**DAILY MASHRIQ PESHAWAR**

پشاور

سید تاج میر شاہ

**مشرق**

مستقل اشاعت کے 49 سال

پشاور اسلام آباد سیکرٹریٹ کے شائع ہونے والے کثیر الاشاعت ذمی اخبار

ABC CERTIFIED

شمارہ 227

جلد 49

شکستہ 26 جمادی الثانی 1437ھ 15 اپریل 2016ء 22 چھت قیمت 12 روپے

پوچھا جاوے

پہلے سادہ

لاڈکانہ این

تعمیری

انہوں کو

سائنس

درجہ

اسلام آباد

آپریٹ

اور یہ وہی ہے جن کے دروازوں کی حالت میں کال

(بقیہ 37 صفحہ 10)

**سیکرٹری تعلیم کا پوسٹل راکٹ پوسٹوں کی فہرستیں طلب**

مختلف آسامیوں پر پوزیشن مختلف انگریزی سالوں سے امتحان میں فہرستیں مرتب کرنے کی عہدیت

پشاور (سابقہ پوزیشن) سیکرٹری تعلیم خیریت پور میں رہتے ہیں۔ ان کی پوسٹوں پر پوزیشن اور پوزیشنوں

پوسٹوں پر انہیں اور پوزیشنوں کی فہرستیں کی تصدیقی سے متعلق انکشاف ہوا تھا جس میں کہا گیا تھا

طلبہ کو کال کر کے اطلاع دیا گیا تھا۔

(بقیہ 37 صفحہ 10)

37

سیکرٹری تعلیم کا پوسٹل راکٹ

ان کے پوزیشنوں پر پوزیشنوں کی فہرستیں مرتب کرنے کی عہدیت

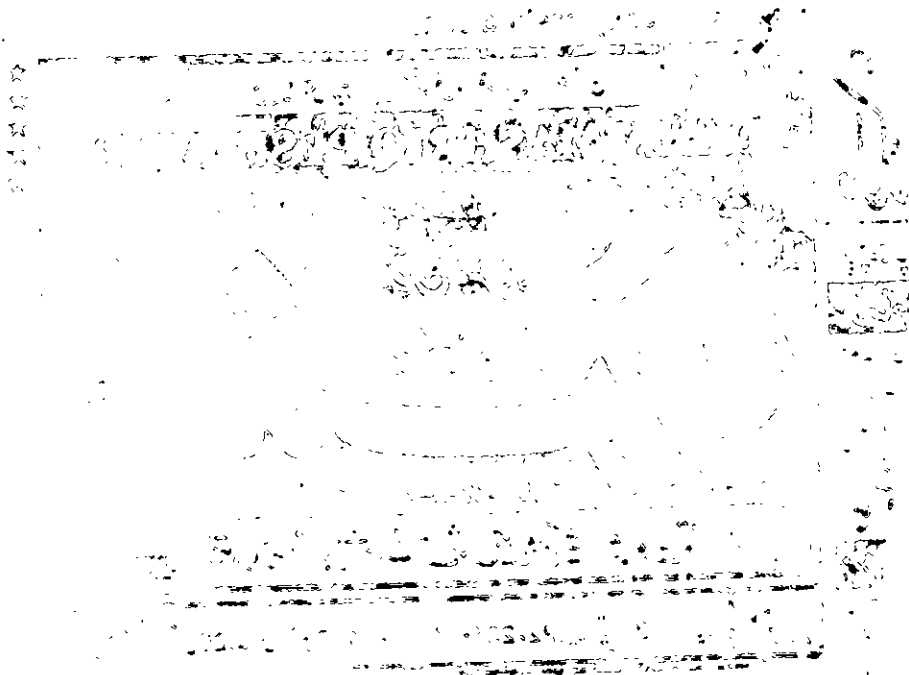
پشاور (سابقہ پوزیشن) سیکرٹری تعلیم خیریت پور میں رہتے ہیں۔ ان کی پوسٹوں پر پوزیشن اور پوزیشنوں

پوسٹوں پر انہیں اور پوزیشنوں کی فہرستیں کی تصدیقی سے متعلق انکشاف ہوا تھا جس میں کہا گیا تھا

طلبہ کو کال کر کے اطلاع دیا گیا تھا۔

KC

ALISTED



پشاور ایسٹ آباد اسلام آباد اور کراچی سے بیک وقت شائع ہونے والا کثیر الاشاعت قومی روزنامہ

روزنامہ **ا ج ا**

ایڈیٹر  
عبدالواحد یوسفی

پشاور  
پاکستان

سنوات 14

جلد 27 ہفتہ 30 اپریل 22-2016 جب الراجب 1437۔ ہرت 12 بجے۔ پے ای ای اڈرکا شمارہ 112



### عیمیر بحق سہرا کی ملازمین پانچ روز کے اندر کارٹریاں واپس لینے کا حکم

صوبائی محکموں میں تمام انکوائریاں تین ہفتے کے اندر مکمل کرنے، سرکاری ملازمین کی ان کی اصل آسامی پر تعیناتی کے احکامات

نے استعمل ہونے سے پہلے سرکاری ملازمین کو اپنی اصل آسامی پر تعیناتی کے احکامات پر عمل پیرا ہونے کی تلقین کی ہے۔

پشاور (خبرنگار خصوصی) صوبائی حکومت نے دیگر سرکاری ملازمین سے سرکاری گاڑیاں واپس لینے کا حکم دیا۔ انتظامی سیکرٹری نے جو ہدایت کی تھی ہے کہ وہ اپنے روز کے آسامی پر تعیناتی دینے والے سرکاری ملازمین کو اپنی اصل آسامی پر تعیناتی کے احکامات پر عمل پیرا ہونے کی تلقین کی ہے۔ اس بات کا فیصلہ چیف سیکرٹری کی زیر صدارت اندر ایک سرپبلک جادی کریٹک فیئر سکن افراد سے اصل آسامی اور محکمے میں تعینات کرنے اور غیر سکن ایک اہلی سکنی اجلاس میں کیا گیا۔ اجلاس میں تمام کارٹریاں واپس لے لی گئی (ہائی سٹو 10 ہفتہ نمبر 85)

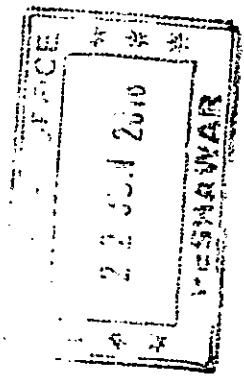
#### 85 ہفتہ نمبر حکومت احکامات

پہلے اجلاس میں فیصلہ کیا گیا کہ سیکرٹریٹ سٹول کے مطابق تمام سربراہی صوبائی حکومت کی منظوری کے لئے چیف سیکرٹری کے ذریعے بھیجا جائے گا۔ سرکاری افسروں کی زیر اہتمام سالانہ کارڈنگ کی رپورٹس فوری طور پر تعیناتی جائیں۔ تمام انکوائریاں تین ہفتے کے اندر مکمل کی جائیں اور محکمہ سلیوشن کو اس کا سرپبلک بھیجا جائے۔ تمام محکمے کو رپورٹس کیسز عدالتوں کی طرف سے جادی حکم امتناعی کی رپورٹ ہارورڈ کے اندر سیکرٹری ٹیکہ قانون کو پیش کریں۔ سیکرٹری قانون ان کیسز کا جائزہ لے کر چیف سیکرٹری اور پورٹ پیش کرے گا۔ سیکرٹری صحت نے اجلاس واپس لے لی گئی کہ سرکاری گاڑیوں میں ٹریکسنگ کرنے سے ہیں۔

ATTESTED

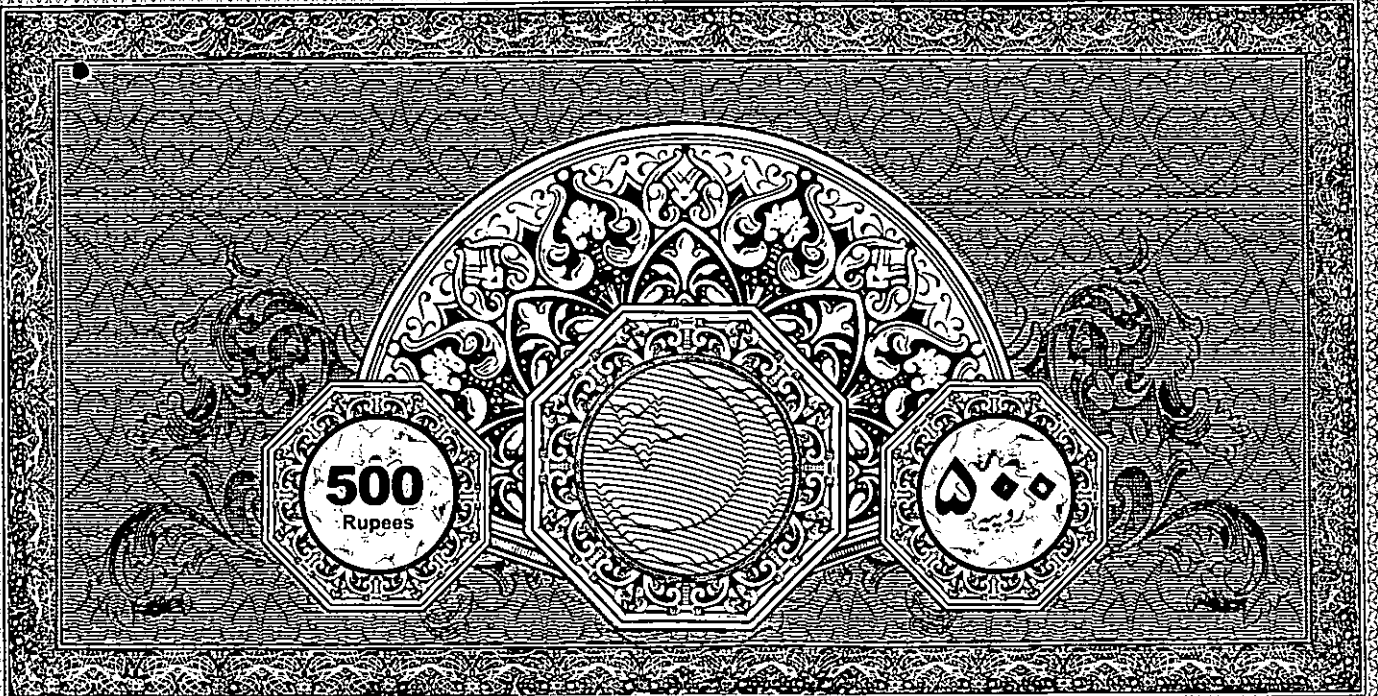


29/6/06



مقامی حکومت پاکستان  
پتہ ذمہ داران  
پتہ ذمہ داران  
پتہ ذمہ داران

POSTAGE  
STAMP VENDOR  
Date of issue  
Postmaster's Signature



PAKISTAN COURT FEE

Before The Chairman Services Tribunal  
Peshawar

Nasira Batool Vs State  
Service Appeal

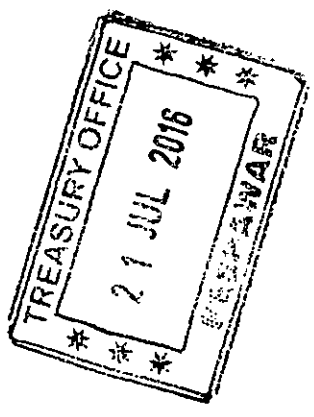
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MS

KPK - 2113

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Jong Seng  
Jong Seng

26/7/16



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S. No. 153 Date 21/7/16  
Account Accountant B-16  
Treasury Office, Keshawar

پشاور بار ایسوسی ایشن، خیبر پختونخواہ

پشاور بار ایسوسی ایشن

61629

ایڈووکیٹ اور محکمہ عدالت

بارنول ابار ایسوسی ایشن

1487

رابطہ نمبر: 0333 45555 02

پشاور

بعدالت جناب: حسرت حسین صاحب - سرگند شری بیٹل پشاور

<p>منجانب: <u>مدد طلبہ</u></p> <p>نام: <u>تصدیقہ بیٹول</u></p> <p>گورنمنٹ لائبریری کالج پشاور</p>	<p>دعویٰ:</p> <p>علت:</p> <p>موضوع:</p> <p>جرم:</p> <p>تھانہ:</p>
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بابت تحریر آنکہ

ماہرہ بیٹول بیٹول پشاور لائبریری کالج پشاور

کلیئر کی طرف سے ماہرہ بیٹول

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ عامہ سرکاری خانہ

آن مقام پشاور کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کمال اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقریر جالت و فیصلہ برطنت دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں مدد منتقل کرنے کا اختیار ہوگا، نیز صورت عدم پیروی یا تاخیر کی صورت میں یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر جانی و پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہو گا اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا مانتہ برداشتہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جہانہ التوائے مقدمہ کے سبب سے ہوگا وہ وکیل موصوف و متول کے کارہنڈار ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ مندر ہے۔

المرقوم: 01/08/16

الع ہد واہ شد

مقام پشاور کے لئے منظور ہے۔



Before the Chairman Service Tribunal, Peshawar  
Service Appeal NO 857/2016  
Mst. Nasira Batool

Khyber Pakhtukhwa  
Service Tribunal

Diary No. 990

Dated 29-9-16

vs

Govt of KPK & others

---

Application for the suspension of impugned  
Corrigendum dt 16/5/2016 to the extent  
of petitioner.

---

2/5

- ① That the above titled case is fixed for hearing before this Hon'ble Court.
- ② That the petitioner was transferred as Head mistress GGHs Damin to GGHs AWI just after 2 months of her posting.
- ③ That a subject specialist was posted on the post of head mistress which is against all norms.
- ④ It is therefore in the interest of justice that the Corrigendum dt 16/5/2016 to the extent of petitioner may please be suspended.

It is therefore prayed that on acceptance of this application the Corrigendum dt 16/5/2016 may please be suspended to the extent of petitioner, & the salaries of petitioner may also be released.

Through petitioner  
Per. Kamran Qarshan 26/9/16

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

Service Appeal No: 857/2016

**Nasira Batool, Headmistress GGHS Awi Booni, District Chitral.** .....Appellant.

**VERSUS**

**Secretary (E&SE)Department, Khyber Pakhtunkhwa & others.** .....Respondents

**JOINT PARAWISE COMMENTS FOR & ON BEHALF OF RESPONDENTS No:1,3&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 instant Service Appeal is badly time barred.
- 3 That the appellant has concealed material facts from this Honorable Tribunal in the instant service appeal.
- 4 That the instant service appeal is based on mala fide intentions.
- 5 That the appellant has not come to this Honorable Tribunal with clean hands.
- 6 That the appellant is not entitled for the relief she has sought from this Honorable Tribunal.
- 7 That the instant Service Appeal is against the prevailing law & rules.
- 8 That the instant Service Appeal is not maintainable in its present form.
- 9 That the instant Service Appeal is bad for mis-joinder & non joinder of the necessary parties.
- 10 That the instant Service Appeal is barred by law.
- 11 That the appellant is not competent to file the instant appeal against the Respondents.
- 12 That the competent authority is entitled to transfer & post a Civil Servant U/S-10 of Civil Servants Act 1973. Wherever, her services are required by the Respondent Department.
- 13 That the impugned transfer order dated 16/5/2016, is legally competent & is liable to be maintained in favour of the Respondents.

**ON FACTS**

- 1 That Para-I needs no comments, being pertains to the Service Record of the Appellant.

- 55
- 2 That Para-2 is correct to the extent vide Notification dated 17/3/2016, the appellant has been promoted against the Headmistress post in BPS-17(Regular) & was wrongly post at GGMS Danin District Chitral as there was no vacant post in the said school. Hence the appellant was adjusted at GGHS Awi Booni District Chitral vide Notification dated 16/5/2016, in view of the Section-10 of Civil Servants Act-1973 Read with Appointment, Promotion & Transfer, rules 1989. Therefore, the plea of the appellant is illegal & is liable to be dismissed. Copy of the said Notifications are annexed as (Annexures-A & B).
  - 3 That Para-3 is also incorrect & denied. Taking overcharge against a post in a school, where, there is no vacant post does not accrue any vested right to the appellant for her adjustment against the Headmistress post at GGMS Danin District Chitral. Hence, the appellant has correctly been adjusted at GGHS Awi Booni District Chitral vide the Notification dated 16/5/2016 in view of the above cited provisions of law by the Respondents Department in the public interest.
  - 4 That Para-4 is incorrect & denied. The act of the Respondent Department with regard to the Notification dated 16/5/2016 is within legal sphere & liable to be maintained.
  - 5 That Para-5 is also incorrect & denied. The statement of the appellant is without any cogent reason & justification in view of the foregoing Paras.
  - 6 That Para-6 is incorrect & denied. No Departmental Appeal against the Notification dated 16/5/2016 of the Respondent No: 1 has been filed by the appellant. Hence, the plea of the appellant is liable to be rejected.
  - 7 That Para-7 needs no comments. However, the Respondent Department further submit on the following grounds inter alia :-

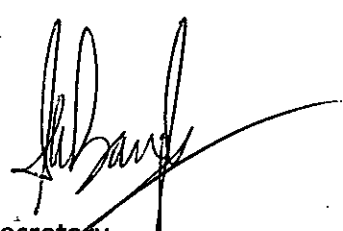
### GROUNDS

- A Incorrect & denied. The appellant has rightly been posted at GGHS Awi Booni against the Headmistress (Regular) in BPS-17, vide the impugned Notification dated 16/5/2016 issued by the Respondent No: 1. Therefore, the plea of the appellant is baseless & liable to be rejected.
- B Incorrect & denied. Detailed reply has been given above. Hence, needs no further comments.
- C Incorrect & misleading. The act of the Respondent No: 1 with regard to the impugned Notification dated 16/5/2016 is within legal parameter. Hence, liable to be maintained.
- D Incorrect & misleading. Every Civil Servants is liable to perform her duty to the utmost satisfaction of the competent authority for which she is being paid.
- E Incorrect & misleading . The statement of the appellant is baseless & without any cogent reason. Hence, liable to be struck-down.
- F Incorrect & denied. The Respondent No: 1 has got jurisdiction to transfer & post the appellant wherever her services are required by the Respondent Department.
- G Incorrect & denied. Spouse policy is not applicable upon the case of the appellant in the given circumstances of the case. Hence is liable to be rejected.

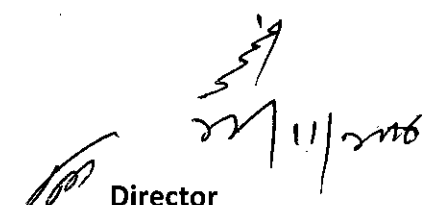
- H Incorrect & denied. The appellant is working against the Headmistress (Regular) in BPS-17, Post which is a Provincial Teaching Cadre post. Hence, the appellant is liable to serve anywhere in the Province.
- I Incorrect & denied. The stand of the appellant is without any cogent proof. Hence, is liable to be struck down.
- J Incorrect & misleading. The appellant has been treated as per law, rules & Policy vide Notification dated 16/5/2016 by the Respondent No: 1 . However, the Respondents further seek leave of this Honorable Tribunal to submit additional grounds & case law / record at the time of arguments.

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

Dated 15/11/2016.



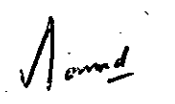
**Secretary**  
E&SE Department Khyber  
Pakhtunkhwa, Peshawar.  
(Respondent No: 1



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

**AFFIDAVIT**

I, Hameedur Rehman Asstt: Director (Litigation-II) E&SE Department do hereby solemnly affirm and declare that the contents of the instant Parawise Comments are true & correct to the best of my knowledge & belief.

  
Deponent

Annex (A)

①

⑩

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GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Dated Peshawar the 17-03-2016

**NOTIFICATION**

No. SO/PE/2-6/DPC Meeting (13/10/2015). On the recommendations of the Departmental Promotion Committee, the Competent Authority is pleased to promote the following Two Hundred and Thirty One (231) Female SSTs (BS-16) to the post of Head Mistresses (BS-17) on regular basis with immediate effect :-

S#	Seny: Est No.	Name of Officer and School Address	Proposed place of Posting	Remarks
1	3	Musarrat Shehnaz BA SET Bec D/O Meenob Lahi GGMS Adeza, Peshawar	H/M B-17 GGHS Daman Afghani Peshawar	Against vacant post
2	66	Badr. Haram, SET, MA, SET BEd, D/O Paimda Mchan mad GGMS Gogdara Swat	H/M B-17 GGHS Gogdara Swat	Against vacant post
3	72	Sajida Ferveen MA SET BEEd D/O Abdul Rehman GGMS Dlak Qutba Haripur	H/M B-17 GGHS Nala Soha Haripur	Against vacant post
4	75	Sanjana Bibi MSc BEEd D/O Mumtaz Zhan SET GGHS Hayatabad Peshawar	H/M B-17 GGHS Shah Kot Nowshera	Against vacant post
5	78	Nabeed Akhter BA BEEd D/O Fazal Rahim GGMS Noutia Jaheed Peshawar	H/M B-17 GGHS Mera Kachori Peshawar	Against vacant post
6	92	Zabida Jabeen SET D/O Q. Fazle Qadus BA Bed GGHS Hayatabad Peshawar	H/M B-17 GGHS Khattak Nowshera	Against vacant post
7	94	Shaheen Tabasum SET D/O Shaheer Ahmad 3A Bed GGHS No.1 Kohat	H/M B-17 GGHS Merozai Kohat	Against vacant post
8	98	Bushra Bibi SET D/O Karam ulah BA Bed SET GGHS Gandan Manshera	H/M B-17 GGHS Parhinna Manshera	Against vacant post
9	99	Nasim Akhtar SET D/O Muhammad Ayub Khan BA Bed SET GGMS Tarnab Charsadda	H/M B-17 GGHS Pattagram Charsadda	Against vacant post
10	101	Shaheen Akhtar SET D/O Tiaz Khan BA Bed SET GGHS Badeshi NSR	H/M B-17 GGHS Nazim Pur Nowshera	Against vacant post
11	107	Yasmeen Bibi SET D/O Ajab Khan FA Bed GGMS Murad Abad Haripur	H/M B-17 GGHS Kalinjar Haripur	Against vacant post
12	109	Seena Naz SET D/O Ahmad Yar Khan BA Bed SET GGHS No.3 D.I.Khan.	H/M B-17 GGHS Nar Azad Kanda Khel Lakki	Against vacant post
13	114	Rizwana Shaheen SET D/O Abdul Aziz BA Bed SET GGHS Kahal Haripur	H/M B-17 GGHS Jolbi Haripur	Against vacant post
14	115	Chaman Ara SET D/O Shah Zaman BA Bed SET GGHS Paharpur D.I.Khan	H/M B-17 GGHS Tajori Lakki Marwat	Against vacant post
15	116	Amna Durani SET D/O Ibrar Ahmad BA Bed SET (Science) GGHS Yaka Toot Peshawar	H/M B-17 GGHS Sheikhso Sardheri Charsadda	Against vacant post
16	117	Bibi Tasleem SET D/O Zabeer Razaq BA Bed SET GGHS University Town Peshawar	H/M B-17 GGHS Aza Khel Peshawar	Against vacant post
17	118	Shaheen Begum SET D/O Muhammadi Israa BA Bed SET GGHS Dheri Malakand	H/M B-17 GGHS Tawda China Dir Lower	Against vacant post
18	119	Sadia Wali SET D/O Saifur Rehman BA Bed SET GGHS No.2 Peshawar Cantt.	H/M B-17 GGHS Saagi Bala, Peshawar.	Against vacant post
19	123	Nasreen SET D/O Sher Malik BA Bed SET GGMS Thana Malakand	H/M B-17 GGHS Hasban Dir Lower	Against vacant post
20	124	Zubaidi Khannum, SET D/O Noor Nawaz BA Bed SET GGMS Mor, Chitral	H/M B-17 GGHS Shughore Chitral	Against vacant post

Rasul

75	206	Nighat Sultan, SET, MA, B.Ed D/O Zafarosh GGMS Sarki Jala Charsadda	H/M B-17 GGHS Dablolala Charsadda	Against vacant post
76	209	Nasim A'za, SET, BA, B.Ed GC CMHS No.1 Mausehra	H/M B-17 GGHS Lalo Bandi Mausehra	Against vacant post
77	210	Robina Shaheen, SET, BA, B.Ed d/o Feroz Din GGMS Lupur	H/M B-17 GGHS S'ool Muhammad Abad Battagram	Against vacant post
78	211	Atia Sultan, SET, BA, B. Ed GGHS Mang Haripur.	H/M B-17 GGHS Shamlai Battagram	Against vacant post
79	215	Samira Rauf SET, BA, B.Ed GGHS KTS No.2 Haripur.	H/M B-17 GGHS Tikri Kharari Battagram	Against vacant post
80	218	Akhter Perveen, SET, M.A. BEd D/O Habib Rehman GGMS Naray Tangai Swat	H/M B-17 GGHS Gu gram Swat	Against vacant post
81	219	Bibi Zairab, SET, BA, BEd D/O M.Yousaf GGHS Ayun Chitral	H/M B-17 GGHS Shahgram Chitral	Against vacant post
82	220	Saeeda Akhtar, SET, BA, BEd GGMS Wari Fayen Dir Upper	H/M B-17 GGHS Wari Dir Upper	Against vacant post
83	221	Asmat Ara Begum SET BSc, BEd GGHS No.1 Mardan.	H/M B-17 GGHS Garhi Ismirzai Mardan	Against vacant post
84	225	Fatima Gul, SET, BA, BEd D/O Aqal Mand GGHS Dargai Malakand	H/M B-17 GGHS Haryankot Malakand	Against vacant post
85	227	Nasira Batool, SET, MA, BEd GGMS Kujji Chitral Chitral	H/M B-17 GGHS Danan Chitral	Against vacant post
86	229	Shaheen, SET, MA, BEd D/O Shaheen Malik GGHS No.1 Mingora Swat	H/M B-17 GGHS Sambat Swat	Against vacant post
87	231	Rukhsana Shaheen, SET, BSc, BEd d/o Sirajud Din GGHS Shabaz Garhi Mardan	H/M B-17 GGHS Bakhshali Mardan	Against vacant post
88	232	Sadaqat Nasreen, SET, MA, B. Ed D/O Saifullah GGHS Badam Bagh cha Thana Mkd.	H/M B-17 GGHS Kithyari Dir Lower	Against vacant post
89	233	Jamila begum, SET MA, BEd D/O Sahib Rehmat GGHS Dabgari Peshawar.	H/M B-17 GGHS S Jeewar Mardan	Against vacant post
90	234	Azida Noreen, SET MA BEd GC CMHS Qala Tarangzai Charsadda	H/M B-17 GGHS Nalag Gul Abad Charsadda	Against vacant post
91	235	Fakhrun Nisa, SET, BA, BEd D/O Abrar Nahi GGMS Mori Bala Chitral	H/M B-17 GGHS Warijon Chitral	Against vacant post
92	236	Ishad Bibi, SET, BA, BEd D/O Abdul Faris GGMS Jughore Chitral	H/M B-17 GGHS Warkip Chitral	Against vacant post
93	237	Shaukat Ali SET, BA, BEd D/O Faik Muhammad GCJ S Malakand	H/M B-17 GGHS Timergara Dir Lower	Against vacant post
94	238	Bibi Labun Nisa, SET BA BEd GGHS Garani Cheshma Chitral	H/M B-17 GGHS Jaranicheshma Chitral	Against vacant post
95	239	Zabida Khatun, SET BA BEd D/O M.Ishaq GGMS Tibana Maqbool Abad Charsadda	H/M B-17 GGHS Sarki Mulyan Charsadda	Against vacant post
96	241	Hassan Ara SET, BSc, BEd GGHS Turlandi Swabi	H/M B-17 GGHS Tano Swabi	Against vacant post
97	242	Wasim Bibi, SET, MA, BEJ GGHS Ziarat Kaka Sahib MSR	H/M B-17 GGHS Marhatti Eanda Nowshera	Against vacant post
98	243	Habibun Nisa, SET, MA, BEd D/O Muhabat khan GGHS Gandigar Dir Upper	H/M B-17 GGHS Bibywar Dir Upper	Against vacant post
99	244	Qudrat bibi, SET, GGMS Shahnighar Chitral BA, BEd D/O Bostan Khan	H/M B-17 GGHS Kosht Chitral	Against vacant post
100	245	Robina, SET, BSc, BEd GGHS Jandar Par Gujar Garhi Mardan	H/M B-17 GGHS Dheri Katlang Mardan	Against vacant post
101	246	Asma Shaheen SET MA M. Ed GCMS Haripur.	H/M B-17 GGHS Amira Battagram	Against vacant post
102	249	Fasim Raziq, SET, GGMS Samandar Kata BSc, BEd A/Abad	H/M B-17 GGHS Siyal Kot A/Abad	Against vacant post
103	250	Fakhrun Nisa, SET, BSc, BEJ D/O A'dullah Jala GGHS Kotka Juma Khan Bannu	H/M B-17 GGHS Pinda Khel Bannu	Against vacant post
104	251	Saeeda Begum, SET, BA BEd D/O M.Saeed GGHS, Malta Swat	H/M B-17 GGHS Kari Swat	Against vacant post

*Rasul Khan*

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225	428	Najia Khatoon, SET, BSc, BEd GGHS Hase D.I. Khan.	H/M B-17 GGHS Gandi Kha. Khel Lakki	Against vacant post
226	430	Naz Perwar, SET, MA, BEd GOM. Sura Saah Prang ghar Mow. and Agne.	H/M B-17 Service placed at the disposal of Director Edu: FATA	Against vacant post
227	431	Rozina Imtiaz, SET, BSc BEd GGHS Nairala D.I. Khan.	H/M B-17 GGHS Deli Mela Karak	Against vacant post
228	433	Mussarat Jehan, SET, M., BEd GGHS Bugudada No.2 Mardan	H/M B-17 GGHS Man Khan Mardan	Against vacant post
229	435	Yasmin Begum, SET, BA BEd d/o Shazaram Khan GGMS Manyal Dir	H/M B-17 GGHS Manyal Dir Lower	Against vacant post
230	436	Fazilat SET, BA BEd GGMS Jambul Swat	H/M B-17 GGHS Koza Bandal Swat	Against vacant post
231	439	Gul Nasreen, SET, MSc BEd GGHS Bagra Hari pur.	H/M B-17 GGHS Batta Manshra	Against vacant post

**Consequential Posting/Transfer**

232	Boshra Begum H/M B-17 GGHS Dag Besud Nowshera	H/M B-17 GGHS Aza Khel Bala Nowshera	Against vacant post
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2. On their promotion, the Head Mistresses concerned will be on probation for a period of one year in terms of Section 6(2) of NWFP Civil Servant Act, 1973 read with Rule 15(1) of the NWFP Civil Servant (Appointment, Promotion & Transfer) Rules, 1989

3. No TA / DA allowed.


**SECRETARY**

Endst. No. & date as above.

Copy to:

1. The Additional Chief Secretary (FATA) FATA Secretariat Warsak Road Peshawar.
2. The Secretary to Govt. of Khyber Pakhtunkhwa Finance Department.
3. The Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department.
4. The Accountant General Khyber Pakhtunkhwa, Peshawar.
5. PSO to Chief Secretary to Govt. of Khyber Pakhtunkhwa.
6. The Director (E&SE) Khyber Pakhtunkhwa Peshawar.
7. The Director Education FATA Warsak Road Peshawar.
8. The Director Curriculum & Teachers Education, Abbottabad.
9. The Director ESRU, Khyber Pakhtunkhwa.
10. The Deputy Director (EMIS), E&SE Department, with the request to upload the notification of E&SE Department website.
11. The District Education Officers, Elementary & Secondary Education concerned.
12. The District Accounts Officers concerned.
13. PS to Secretary E&SE Department.
14. Headmistress/SS concerned.
15. Office File.

  
SECTION OFFICER PRIMARY



Annex (B)

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GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Dated: Peshawar the 16-05-2016

CORRIGENDUM

No. SO (PE) / G.D.P.C. Meet. on 11/10/07: in partial modification of this Department Notification of even number dated 17/03/2016 the following officers are hereby posted and adjusted as mentioned against each:

S.No	Sl.#	Name of Officer	Already Adjusted at	Proposed As	Remarks
1	92	Mrs. Abida Jabeen	H/M B-17 GGHS Khatuk Nowshera	H/M B-17 GGHS Jamroz Khan Killay Charsadda	Against vacant post
2	129	Mrs. Parveen Zahida / Abad	H/M B-17 GGHS Malach / Abad	H/M B-17 GGHS Namli Mera A/Abad	Against vacant post
3	402	Mrs. Shagufta Yasmin	H/M BS-17 GGHS Sar Haripur	H/M B-17 GGHS Jarced Manselra	Against vacant post
4	227	Mrs. Nazira Hatoon	H/M B-17 at GGHS Daman Chitral	H/M B-17 GGHS Awi Chitral	Against vacant post
5	135	Mrs. Najma Begum	H/M GGHS Kohi Barmal Mardan	H/M B-17 GGHS Fatima Mardan	Against vacant post
6	65	Mrs. Dilshad	H/M B-17 GGHS Sangi Gu Ahmad Mardan	H/M B-17 GGHS Muhammad Wali Killay Mardan	Against vacant post
7	172	Mrs. Perveen Wani	H/M B-17 GGHS Parsnar Kohat	H/M B-17 GGHS Khadar Ebel Kohat	Against vacant post
8	139	Mrs. Zahara Ham	H/M B-17 GGHS Terai Malakand	H/M B-17 GGHS Qaldara Malakand	Against vacant post
9	227	Mrs. Rozina Humaz	H/M B-17 GGHS Dohi Nela Karak	H/M B-17 GGHS Jehangiri Karak	Against vacant post
10	7	Mrs. Talayam Mehsood	H/M B-17 GGHS Sawa Dir Lower	H/M B-17 GGHS Talaveya Dir Lower	Against vacant post
11	350	Rashida Begum	H/M B-17 GGHS Ziam Dera Dir Lower	H/M B-17 GGHS Jodigram Dir Lower	Against vacant post
12	75	Mrs. Mushafa	H/M B-17 GGHS Pajana Swabi	H/M B-17 GGHS Kaku Dera Swabi	Against vacant post
13	131	Mrs. Iqbal Lwabi	H/M B-17 GGHS Ahmad Abad Karak	H/M B-17 GGHS Sur Jag Karak	Against vacant post
14	151	Mrs. Tehida Begum	H/M B-17 GGHS Marlat Mardan	H/M B-17 GGHS Chandheji Mardan	Against vacant post
15	96	Mrs. Hussain Ara	H/M B-17 GGHS Tel Swabi	H/M B-17 GGHS Sarwar Shah Kotai Swabi	Against vacant post
16	106	Mrs. Tasleem Begum	H/M B-17 GGHS Chenghi Bannu	H/M B-17 GGHS Degai Bannu	Against vacant post
17	106	Mrs. Baswar Jan	H/M B-17 GGHS Kotka Daulat Khan Bannu	H/M B-17 Dheri Ghandi Esaki Bannu	Against vacant post
18	123	Mrs. Bani Aisha	H/M B-17 GGHS Senazo Shah Charsadda	H/M B-17 GGHS Ucha Wala Charsadda	Against vacant post
19	71	Mrs. Shaheen Badar	H/M B-17 GGHS Maraki Baada Karak	H/M B-17 GGHS Gul Imam Tank	Against vacant post
20	21	Mrs. Sultana Sabbar	H/M BS-17 GGHS Gwalera Swat	H/M B-17 GGHS Ningolai Swat	Against vacant post
21	77	Mrs. Shaheen Rohma	H/M BS-17 at GGHS Gul Muhammad Bahagram	H/M B-17 GGHS Gandian Haripur	Against vacant post
22	78	Mrs. Atiya Sultana	H/M BS-17 GGHS Shawalai Bahagram	H/M B-17 GGHS Kohala Bala Haripur	Against vacant post



23	246	Mst. Asim Shabeen	HM BS-17 GGHS Ajmera Battagram	HM B-17 GGHS Hamlet Swabi	Against vacant post
24	217	Mst. Samina Raul	HM B-17 GGHS Tiken Khairi Battagram	HM B-17 GGHS Bandi Jeeeran H. opur	Against vacant post
25	223	Mst. Fatima Gu	HM BS-17 GGHS Torjankot Malakand	HM BS-17 GGHS Dolbandi Malakand	Against vacant post
26	335	Mst. Yasmin Akhla	HM BS-17 GGHS Spal Bam (S. west)	HM B-17 GGHS Tatabal Swat	Against vacant post
27	362	Mst. Faqir Naseem	HM BS-17 GGHS Katakai Marjan	HM B-17 GGHS F. ana Khet Nowshera	Against vacant post
28	272	Mst. Naseem Begum	HM BS-17 GGHS Kala Killy Swat	HM BS-17 GGHS Zhakesar, Shanaifa	Against vacant post
29	250	Mst. Bibi Gulia	HM BS-17 GGHS Sh. 29, Charsadda	HM BS-17 GGHS Hoobak, Charsadda	Against vacant post
30	269	Mst. Safia Raul	HM BS-17 GGHS Killy Killy Nowshera	HM BS-17 GGHS Khet Killy, Nowshera	Against vacant post
31	427	Mst. Roshan Ara	HM BS-17 GGHS Nara Banda, Karakoram	HM BS-17 GGHS Wana La, D. J. Khan	Against vacant post
32	433	Musarat Khan, S.T. MA BEd	HM B-17 GGHS Mian Khan Marjan	HM B-17 GGHS Mian Khan Mardan	Against vacant post. She has retired from service on superannuation on 14.12.2015, while the DPC was held on 15.10.2015 thus she is promoted w.e.f. date of DPC, in light of Establishment Department Instructions SOCR-VIJE&AD1-16/2005 dated 22.01.2006
33	119	Saeeda Wali SGT D.D. Sarfar Rehman B.A. BEd SGT GGHS No 2 Peshawar Cantt.	HM B-17 GGHS Shagi Bala, Peshawar.	May be read as Saeeda Wali HM BS-17, GGHS Shagi Bala, Peshawar instead of Sadia Wali	As amended

2. No. TA /DA allowed

SECRETARY

Encls. No. & date as above.

Copy to

1. The Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department.
2. The Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department.
3. The Accountant General Khyber Pakhtunkhwa, Peshawar.
4. PSO to Chief Secretary to Govt. of Khyber Pakhtunkhwa.
5. The Director (E&SE) Khyber Pakhtunkhwa Peshawar.
6. The Director Education F.T.A. Warsak Road, Peshawar.
7. The Director Curriculum & Teachers Education, Peshawar.
8. The Director ESRG, Khyber Pakhtunkhwa.
9. The Deputy Director (EMMS) E&SE E. Peshawar, with the request to upload the corrigendum on ECSE Department website.
10. The District Education Officers, Elementary & Secondary Education concerned.
11. The District Accounts Officers concerned.
12. PS to Secretary E&SE Department.
13. Heads of offices concerned.
14. Office file.

(MUSAMMAD NASIR KHAN)  
SECTION OFFICER PRIMARY

**BEFORE THE KHYBER PAKHTUNKHUWA**  
**SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. 857/2016

Mst. Nasira Batool

**V E R S U S**


Government of Khyber Pakhtunkhwa (KPK) through Chief Secretary at  
Civil Secretariat Peshawar and others

**INDEX OF DOCUMENTS SUBMITTED WITH WRITTEN COMMENTS**

S.No.	Description of Documents	Annexure	Pages
1.	Written comments		1-4
2.	Affidavit		5
3	Copy of notification dated 24-01-2014	"A"	6
4	Copy of the Notification dated 17-03-2016	"B"	7-9
5	Copy of Statistics of Vacancy Location	"C"	10
6	Copy of Charged assumption report	"D"	11
7	Copy of Pay Slip	"E"	12
8	Copy of Vacancy Certificate	"F"	13
9	Copy of Corrigendum Proposal	"G"	14
10	Copy of Corrigendum Order	"H"	15-16
11	Copy of Notification dated 26-10-2010	"I"	17
12	Wakalatnama		18

Respondent No. 2

Through

.....  
  
Syed Ghuffran ullah Shah  
(Advocate Peshawar)  
Office; 22-A Nasir Mansion  
Railway Road, Peshawar  
Cell No.0336-9146221

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**BEFORE THE KHYBER PAKHTUNKHUWA**  
**SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. 857/2016

**Mst. Nasira Batool**

**V E R S U S**

Government of Khyber Pakhtunkhwa (KPK) through Chief Secretary at  
Civil Secretariat Peshawar and others

**Written Comments for and on behalf of Respondent No. 2**

Respectfully Sheweth;

Written comments in the subject Service Appeal are submitted as  
under;

**PRELIMINARY OBJECTIONS;**

1. That the appellant has got no cause of action as well as locus standi.
2. That the appeal is badly time bard.
3. That the appeal is not maintainable in its present form and also present circumstances.
4. That the appellant has not come to this Honourabel Tribunal with clean hands.
5. That the appellant estopped by her own conduct to file the instant appeal before this honourable tribunal.
6. That the appellant has concealed the material facts from this honourable tribunal, hence; liable to be dismissed.
7. That the present appeal is bad for miss-joinder and non-joinder of necessary parties.
8. The appellant has filed the instant appeal on malafide motives.

9. That the instant appeal is against the prevailing law and rules.

**OBJECTION ON FACTS;**

1. Para No. 1 of the appeal is correct, hence needs no comments.
2. That the first part of Para No.2 is correct to the extent that appellant/petitioner was promoted from BPS-16 to BPS-17 vide Notification No. SO(PE)2-4/DPC on dated 17-03-2016 and was posted at GGCMS Danin Chitral against the already occupied post. The remaining part of the Para No.2 is incorrect; that HM GGCMS Danin was not laying vacant, it was filled and occupied by respondent No.2 vide notification No. SO(S)(F)(ENS)4-16/2014 on 24-01-2014. The vacancy certificate issued by DEO(F) is bogus and self-made hence; denied. **(Copy of notifications and statistics of vacancy location are annexed as annexure "A" "B" &" C")**
3. Para No. 3 of the appeal is incorrect hence; denied. The appellant/petitioner had not been assumed charge since its promotion; the charge assumption report annexed with the appeal is fake/fabricated not containing the signature and assent of the presently working HM. The next of the Para is also incorrect; the pay slip attached with the appeal is not genuine.  
**(Copy of the charge assumption report and pay slip are annexed as annexure "D" & "E")**
4. Para No. 4 of the appeal is denied because the petitioner has never performed her duty since its promotion; she has not taken any charge. It is, correct that on 19-03-2016 the DEO Female has issued vacancy certificate in which the DEO(F) has mentioned that the GGCMS Danin Chitral is not laying vacant. It is correct that on 21-03-2016 the Directorate of E&SE KPK Peshawar submitted proposal before secretary for corrigendum order of the appellant/petitioner as HM BPS-17 GGHS Awi Chitral. It is, admitted that on 16-05-2016 respondent No.1 issued corrigendum order wherein the appellant was shown at S.No.4 and was transferred/adjusted as HM to GGHS Awi Chitral. The next part of the Para is denied. **(Copy of the vacancy certificate, corrigendum proposal and corrigendum order are annexed as annexure "F" "G" & "H")**
5. Para No. 5 of the appeal is incorrect, hence; denied because the GGCMS Danin Chitral HM post was not vacant the

appellant/petitioner was transferred/adjusted to GGHS Awi Chitral as HM. The transfer of the appellant/petitioner through corrigendum was legal and according to the policy. The subsequent corrigendum order not comes under the ambit of premature transfer.

6. Para No. 6 of the appeal is incorrect, hence denied because the appellant has not made any departmental appeal.
7. Para No. 7 of the appeal needs no comments.

**OBJECTION ON GROUNDS;**

- a. Ground "A" of the appeal is correct to this extent that the appellant/petitioner was posted as HM at GGCMS Danin Chitral against already filled/occupied post. It is, incorrect, miss-leading and denied that the appellant/petitioner has never assumed charge since her promotion. It is, correct and admitted that appellant/petitioner was again posted/transferred to GGHS Awi Chitral through corrigendum order because the previous posting/transfer was wrong and against the filled post and then the subsequent corrigendum order was legal and according to rule and policy.
- b. Ground "B" of the appeal is incorrect, denied.
- c. Ground "C" of the appeal is completely denied because the appellant/petitioner first posting at GGCMS Danin Chitral was a wrong posting by respondent No. 1 and 4 and also against the rule and policy.
- d. Ground "D" of the appeal is needs no comments related to the appellant/petitioner official track record. The subsequent corrigendum order was legal and under the rule of Civil Servant Act 1973.
- e. Ground "E" of the appeal is incorrect, denied and not admitted.
- f. Ground "F" of the appeal is correct to this extent that respondent No. 2 is Subject Specialist "Chemistry". She was transferred/posted as HM by Government of KPK Elementary & Secondary Education DEPT vide notification No. SO(S/F)E&SE4-6/2014 Atia Faizi (SS). It is not first time or against the rules and policies that (SS) be posted as HM in High Schools. It is evident from the Notification No. SO(S/E)&SE/4 to 16/2009 under the said notification to (SS) war posted/transferred as HM at GGHS Koghuzi Chitral and HM GGHS

Booni Chitral against the vacant post on 26-02-2010. Hundreds such like precedents are available. **(Copy of the Notification is annexed as annexure "I")**

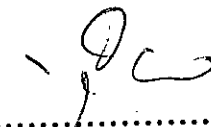
- g. Ground "G" of the appeal is miss-leading, incorrect and denied. The petitioner does not come under the spouse policy in the same District and a very short distance.
- h. Ground "H" of the appeal is denied, incorrect and not admitted.
- i. Ground "I" of the appeal needs no comments.
- j. Ground "J" of the appeal is incorrect, denied and miss-leading.

**PRAYERS:**

It is, therefore, in the view of the above made submission; it is, humbly requested that this honourable tribunal may very graciously be pleased to dismiss the appeal with cost throughout in favour of the respondent No. 2.

**Respondent No.2**

**Through**

  
.....  
**Syed Ghufan ullah Shah**  
**(Advocates Peshawar)**

**BEFORE THE KHYBER PAKHTUNKHUWA**  
**SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. 857/2016

Mst. Nasira Batool

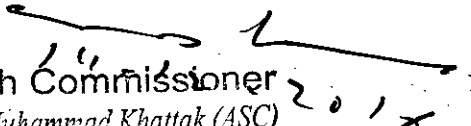
**V E R S U S**

Government of Khyber Pakhtunkhwa (KPK) through Chief Secretary at  
Civil Secretariat Peshawar and others

**AFFIDAVIT;**

I, **Syed Ghufuran ullah Shah** Advocate, Counsel of respondent No.2, do hereby solemnly affirm and verify that all the contents of the written Comments; as conveyed by my client (Mst. Atia Faizi/Respondent No.2); are true and correct to the best of my knowledge and belief.

  
Counsel

  
Oath Commissioner  
Eid Muhammad Khattak (ASC)  
License No.961/14-4-2014  
Peshawar High Court Peshawar  
CNIC: 17301-7401834-5

(Annexure) (A)

LP 1 (6)

32

5

0

GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Dated Peshawar January 24, 2014 / 24-1-2014 /

NOTIFICATION

NO. SC(S/P)E&SE/14-16/2014/Alia Faizi SS: Ms. Alia Faizi Subject Specialist Chemistry  
(BS-17) working as Instructor RTE (M) Dist. Chitral is hereby transferred and adjusted as  
Headmistress (BS-17) (wrong posting) at GHS Danian, Chitral against Ms. Samina Jehan, due  
for promotion (BS-17 to BS-18) as and when the post get vacant, in the interest of public service  
with immediate effect.

No TA/DA allowed.

SECRETARY

End of even No & date

Copy forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE, Peshawar.
3. Director DCTE, Khyber Pakhtunkhwa, Abbottabad.
4. District Education Officer (F) Chitral.
5. District Accounts Officer Chitral.
6. Incharge EMIS, E&SE Department.
7. Officer concerned.
8. Office order file.

*[Handwritten Signature]*

(FOZIA NAZI)  
SECTION OFFICER (S/P)

*[Handwritten Signature]*  
**ATTESTED**





Dated Peshawar the 17-03-2016

## NOTIFICATION

No. SO(PE)/2-6/DPC Meeting (13/10/2015). On the recommendations of the Departmental Promotion Committee, the Competent Authority is pleased to promote the following Two Hundred and Thirty One (231) Female SSTs (BS-16) to the post of Head Mistresses (BS-17) on regular basis with immediate effect :-

Sr. No.	Ser. No.	Name of Officer and School Address	Proposed place of Posting	Remarks
1	53	Musarrat Shehroz BA SET Bed D/O Meboob Jilali GGMS Adezai Peshawar	H/M B-17 GGHS Daman Afghani Peshawar	Against vacant post
2	66	Hadi Harem, SET, MA, SET BED, D/O Faima Muhammad GGMS Gogdara Swat	H/M B-17 GGHS Gogdara Swat	Against vacant post
3	72	Sajida Perveen MA SET BED D/O Abdur Rehman GGMS Dlak Qutha Haripur	H/M B-17 GGHS Nala Sola Haripur	Against vacant post
4	75	Sameena Bibi MSc BED D/O Mumtaz Khan SET GGHS Hayatabad Peshawar	H/M B-17 GGHS Shah Kot Nowshera	Against vacant post
5	78	Naheed Akhter BA BED D/O Fazal Rahimi GGMS Noulia Jadeed Peshawar	H/M B-17 GGHS Mera Kachori Peshawar	Against vacant post
6	92	Abida Jabeen SET D/O Q. Fazale Qadus BA Bed GGHS Hayatabad Peshawar	H/M B-17 GGHS Khattak Nowshera	Against vacant post
7	94	Shaheen Tabasum SET D/O Shakoor Ahmad BA Bed GGHS No.1 Kohat	H/M B-17 GGHS Merozai Kohat	Against vacant post
8	98	Bushra Bibi SET D/O Karam Hali BA Bed SET GGHS Gandian Manshera	H/M B-17 GGHS Pathana Manshera	Against vacant post
9	99	Nasim Akhtar SET D/O Muhammad Ayub Khan BA Bed SET GGMS Tamab Charsadda	H/M B-17 GGHS Battagram Charsadda	Against vacant post
10	101	Shaheen Akhtar SET D/O Fiaz Khan BA Bed SET GGHS Badrashi NSR	H/M B-17 GGHS Nizam Pur Nowshera	Against vacant post
11	107	Yasmeen Bibi SET D/O Ajab Khan BA Bed GGMS Murad Abad Haripur	H/M B-17 GGHS Kalinjar Haripur	Against vacant post
12	109	Seema Naz SET D/O Ahmad Yar Khan BA Bed SET GGHS No.3 D.I.Khan	H/M B-17 GGHS Nar Azad Kando Khel Lakki	Against vacant post
13	114	Rizwana Shaheen SET D/O Abdul Aziz BA Bed SET GGHS Kahal Haripur	H/M B-17 GGHS Aloha Haripur	Against vacant post
14	115	Chaman Am SET D/O Shah Zaman BA Bed SET GGHS Pahrpur D.I.Khan	H/M B-17 GGHS Tajori Lakki Marwat	Against vacant post
15	116	Amina Durrani SET D/O Ibrar Ahmad BA Bed SET (Science) GGHS Yaka Toot Peshawar	H/M B-17 GGHS Sheikh Sardheri Charsadda	Against vacant post
16	117	Bibi Tasleem SET D/O Abdur Razzaq BA Bed SET GGHS University Town Peshawar	H/M B-17 GGHS Agha Khel Peshawar	Against vacant post
17	118	Shaheen Begum SET D/O Mohammed Israr BA Bed SET GGHS Dheri Malakand	H/M B-17 GGHS Tawda Chitna Dir Lower	Against vacant post
18	119	Sajida Wali SET D/O Saifur Rahman BA Bed SET GGHS No.2 Peshawar Cantt.	H/M B-17 GGHS Shagi Hala, Peshawar	Against vacant post
19	123	Nasreen SET D/O Sher Malik BA Bed SET GGMS Thana Malakand	H/M B-17 GGHS Hasbaur Dir Lower	Against vacant post
20	124	Zubaida Khanum SET D/O Noor Nawaz BA Bed SET GGMS Meri Chitral	H/M B-17 GGHS Shughore Chitral	Against vacant post

ATTESTED

75	206	Nighat Sultan, SET, MA, B.Ed D/O Zarfarooh GGMS Sarki Jalai Charsadda	H/M B-17 GGHS Behlola Charsadda	Against vacant post
76	209	Nasim Afza, SET, BA, B.Ed GGCMHS No.1 Manshira.	H/M B-17 GGHS Lalo Handi Manshira	Against vacant post
77	210	Rubina Shaheen, SET, BA, B.Ed d/o Feroz Din GGCMHS Haripur	H/M B-17 GGHS Gul Muhammad Abad Battagram	Against vacant post
78	211	Atifa Sultan, SET, BA, B.Ed GGHS Mang Haripur.	H/M B-17 GGHS Shamali Battagram	Against vacant post
79	215	Samina Rauf SET, BA, B.Ed GGHS KTS No.2 Haripur.	H/M B-17 GGHS Tikri Kharari Battagram	Against vacant post
80	218	Akhtar Perveen, SET, MA, B.Ed D/O Habib Rehman GGMS Naray Tangai Swat	H/M B-17 GGHS Guligram Swat	Against vacant post
81	219	Bibi Zainab, SET, BA, B.Ed D/O M.Yousaf GGHS Ayun Chitral	H/M B-17 GGHS Shakgram Chitral	Against vacant post
82	220	Saceda Akhtar, SET, BA, B.Ed GGMS Wari Payan Dir Upper	H/M B-17 GGHS Wari Dir Upper	Against vacant post
83	221	Asmat Ara Begum, SET BSc, BEd GGHS No.1 Mardan.	H/M B-17 GGHS Garhi Ismailzai Mardan	Against vacant post
84	225	Fatima Gul, SET, BA, B.Ed D/O Aqal Mand GGHS Dargai Malakand	H/M B-17 GGHS Haryankot Malakand	Against vacant post
85	227	Nasira Batool, SET, MA, B.Ed GGMS Kuju Chitral Chitral	H/M B-17 GGHS Dahan Chitral	Against vacant post
86	229	Shaheen, SET, MA, B.Ed D/O Shaheen mulk GGHS No.1 Mingora Swat	H/M B-17 GGHS Sambat Swat	Against vacant post
87	231	Rukhsana Shaheen, SET, BSc, BEd d/o Sirajud Din GGHS Shabaz Garhi Mardan	H/M B-17 GGHS Bakhshali Mardan	Against vacant post
88	232	Sadaqat Nasreen, SET, MA, B.Ed D/O Saifullah GGHS Hadam Baghicha Thana Mkd.	H/M B-17 GGHS Kithyari Dir Lower	Against vacant post
89	233	Jamila begum, SET MA, B.Ed D/O Sahib Rehmat GGCHSS Dabgari Peshawar.	H/M B-17 GGHS Jeewar Mardan	Against vacant post
90	234	Abida Noreen, SET, MA BEd GGCMHS Qala Turangai Charsadda	H/M B-17 GGHS Nalaqi Gul Abad Charsadda	Against vacant post
91	235	Fakhrun Nisa, SET, BA, B.Ed D/O Abrar Nabi GGCMHS Mori Bala Chitral	H/M B-17 GGHS Wariyon Chitral	Against vacant post
92	236	Irshad Bibi, SET, BA, B.Ed D/O Abdul karim GGMS Jughore Chitral	H/M B-17 GGHS Warkip Chitral	Against vacant post
93	237	Shaukar Ara SET, BA, B.Ed D/O Naik Muhammad GGHS Malakand	H/M B-17 GGHS Timergara Dir Lower	Against vacant post
94	238	Bibi Zaibun Nisa, SET BA BEd GGHS Garam Cheshma Chitral.	H/M B-17 GGHS Garamcheshma Chitral	Against vacant post
95	239	Zubaida Khatoon, SET, BA BEd D/O M.Ishfaq GGMS Tibana Marqbool Abad Charsadda	H/M B-17 GGHS Sarki Mulyan Charsadda	Against vacant post
96	241	Hussan Ara SET, USc, BEd GGHS Turlandi Swabi	H/M B-17 GGHS Tano Swabi	Against vacant post
97	242	Wasim Dibi, SET, MA, BEd GGHS Ziarat Kaka Sahib NSR	H/M B-17 GGHS Marfazi Banda Nowshera	Against vacant post
98	243	Habibun Nisa, SET, MA, BEd D/O Mahabat Khan GGHS Gandigar Dir Upper	H/M B-17 GGHS Dilyawar Dir Upper	Against vacant post
99	244	Qudrat bibi, SET, GGMS Shahinagar Chitral BA, BEd D/O Bostan Khan	H/M B-17 GGHS Kooli Chitral	Against vacant post
100	245	Robina, SET, BSc, BEd GGHS Jendar Par Gujar Garhi Mardan	H/M B-17 GGHS Dhari Kotlang Mardan	Against vacant post
101	246	Asma Shaheen SET MA M.Ed GGMS Haripur.	H/M B-17 GGHS Ajmira Battagram	Against vacant post
102	249	Tasnim Raziq, SET, GGHS Samandar Kata BSc, BEd A/Abad	H/M B-17 GGHS Siyal Kot A/Abad	Against vacant post
103	250	Fakhrun Nisa, SET, BSc, BEd D/O Abdullah Jan GGHS Koika Juma Khan Bannu	H/M B-17 GGHS Panda Khel Bannu	Against vacant post
104	251	Saceda Begum, SET, BA BEd D/O	H/M B-17 GGHS Kari Swat	Against vacant post

ATTESTED

225	428	Narjas Khatoun, SET, BSc: BEd GGHS Hassa D.I.Khan.	H/M B-17 GGHS Gaudi Khan Khel Lakki	Against vacant post
226	430	Naz Perwar, SET, MA BEd GGMS Sara Shah Prang ghar Mohamand Agency.	H/M B-17 Service placed at the disposal of Director Educ. FATA	Against vacant post
227	431	Rozina Imtiaz, SET, Bsc BEd GGHS Naivela D.I.Khan.	H/M B-17 GGHS Beli Mela Karak	Against vacant post
228	433	Mussarat Jehan, SET, MA BEd GGHS Bughulada No.2 Mardan	H/M B-17 GGHS Mam Khan Mardan	Against vacant post
229	435	Yasmin Begum, SET, BA BEd do Shazitan Khan GGMS Manyal Dir	H/M B-17 GGHS Marwal Di Lower	Against vacant post
230	436	Fazilat SET, BA BEd GGMS Jambil Swat	H/M B-17 GGHS Roza Bandai Swat	Against vacant post
231	439	Gul Nasteen, SET, MSc BEd GGHS Bagra Haripur.	H/M B-17 GGHS Bawal Manohra	Against vacant post

**Consequential Posting/Transfer**

232	Bushra Begum H/M B-17 GGHS Dag Besud Nowshera	H/M B-17 GGHS Azi Khat Bala Nowshera	Against vacant post
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2. On their promotion, the Head Mistresses concerned will be on probation for a period of one year in terms of Section 6(2) of NWFP Civil Servant Act, 1973 read with Rule 15(1) of the NWFP Civil Servant (Appointment, Promotion & Transfer) Rules, 1989.

3. No TA / DA allowed.

SECRETARY

Encl. No. & date as above.  
Copy to:

1. The Additional Chief Secretary (FATA), FATA Secretariat Warsak Road Peshawar.
2. The Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department.
3. The Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department
4. The Accountant General Khyber Pakhtunkhwa, Peshawar.
5. PSO to Chief Secretary to Govt. of Khyber Pakhtunkhwa.
6. The Director (E&SE) Khyber Pakhtunkhwa Peshawar.
7. The Director Education FATA, Warsak Road, Peshawar.
8. The Director Curriculum & Teachers Education, Abbottabad.
9. The Director ESRU, Khyber Pakhtunkhwa.
10. The Deputy Director (EMIS), E&SE Department, with the request to upload the notification of E&SE Department website.
11. The District Education Officers, Elementary & Secondary Education concerned.
12. The District Accounts Officers concerned.
13. PS to Secretary E&SE Department.
14. Headmistress/SS concerned.
15. Office File.

*[Signature]*  
SECTION OFFICER PRIMARY

*[Signature]*  
**ATTESTED**

Annexure (C) P-10

(13) (14)

Annex (B)



District Education Officer Female Chitral.

STATEMENT SHOWING THE DISTRICT WISE DETAIL OF VACANT POSTS OF MALE/FEMALE AS STOOD ON 25.01.2016

S.N	Name of School	" 20		Princip al B-19		Princip al B-18		Headmast er B-17		SS B-18		SS B-17		DPE B-17		Librar ian B- 17		IT B- 17		SST B10 Chem B- 16		SST Matha Phy B-		SST Gener al B-16		IT B-16		Total		
		M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	Total
1	GGHS Bave				1																								1	1057
2	GGHS Ap...				1																								1	1057
3	GGHS Droc...				1																								1	1057
4	GGHS Bcomi						1																						1	1057
5	GGHS Mastaj						1																						1	1057
6	GGHS Degan								1																				1	1057
7	GGHS Spothure																												1	1057
8	GGHS Garam Chash...																												1	1057
9	GGHS Awi Bcomi																												1	1057
10	GGHS Kosh																												1	1057
11	GGHS Warijun																												1	1057
12	GGHS Sheer...																												1	1057
13	GGHS Warkup																												1	1057
14	GGHS Khot																												1	1057
15	GGHS Brep																												1	1057
Total Vacancies		0	0	0	3	0	2	0	10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	15	157

ATTESTED

Latest e-mail on 25-1-16  
Sent by DEO Chitral.  
(f)

District Education Officer  
Female Chitral

Annexure

(D)

P-11

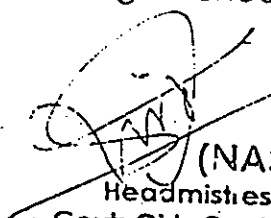
Annex (D)

(17)

GOVERNMENT OF KHYBER PAKHTUNKHWA

CHARGE ASSUMPTION REPORT

In compliance with the Order of Government of Khyber Pakhtunkhwa  
Elementary & Secondary Education Department Notification No. SO  
(PE)/2-6/DPC Meeting (13/10/2015) Promote from SST (BS-16) To the Post of  
Headmistress (BS-17) on regular basis Dated Peshawar the 17-03-2016, at  
serial No. 85. I assumed the charge of the Post of Headmistress, in BPS-17,  
Office of the Govt. Girls Centennial Model High School Denin Chitral  
today on 17-03-2016 (F/noon).

  
(NASIRA BATOOL)  
Headmistress BPS-17 (Regular)  
Govt. Girls Centennial Model High  
School Denin Chitral

OFFICE OF THE HEADMISTRESS GOVT: GIRLS CENTENNIAL MODEL  
HIGH SCHOOL DENIN DISTRICT CHITRAL

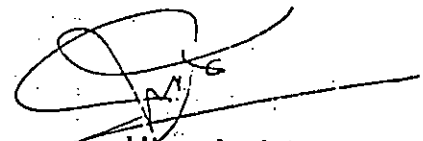
No. 756-61

Dated 17<sup>th</sup> March 2016.

Copy Forwarded to the:-

1. Director E&SE Khyber Pakhtunkhwa, Peshawar.
2. PS to Secretary E&SE Department Khyber Pakhtunkhwa.
3. District Education Officer (Female) Chitral.
4. District Accounts Officer Chitral.
5. District "EMIS" DEO Female Office Chitral.
6. Office file.

For information And necessary action please.

  
Headmistress  
Govt. Girls Centennial Model High  
School Denin Chitral

  
ATTESTED

Annexure - (E)

Annex (E)  
Q-AD-CP

18

19

70

A.T.M.-9.  
(See Para 59, Audit Manual)

PAY SLIP

OFFICE OF THE ADAO *chitral*.

No. .... the. .... 19

*Mst. Nasir Baitool H.I.A.B-17*

*DOCMHS D en chitral*  
(20680-155-5980) he is entitled to draw pay and allowances at the monthly rates shown below from the dates specified less already drawn :-

Detail of calculation

	From	From	From	From
Substantive Pay .. Pay=	17-3-76			
Officiating pay HRA=	48670			
Overseas pay CHA=	2955			
Special pay CA=	100			
Indexed Pay UAA=	5000			
	MA=			
	3373			
	ARS0%			
	8995			
	AR-13			
	5100			
	AR-14			
	3400			
Total AR-15	4867			

All deduct  
the financial  
part.

1  
Addl. District Accounts Officer  
Chitral

T= 86960/-

ATTESTED

Annexure (B)

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) CHITRAL

NO 7075 DEOF/C

DATED 19-3-2016

VACANCY CERTIFICATE

It is certified that the post of Headmistress of GGHS Danin Chitral is not vacant and has already been occupied by Atia Faizi (senior S.S BPS-17) under spouse policy, as her husband is posted here at Chitral as Assistant Commissioner Chitral. However posts of Headmistresses of GGHS Mastuj Chitral, GGHS Awi Chitral and etc.. are still laying vacant.

District Education Officer (Female)  
Chitral.

C.C

- 1) Secretary E&SE to the Govt: of KPK at Peshawar.
- 2) Director E&SE KPK at Peshawar.
- 3) Headmistress GGHS Danin Chitral.
- 4) Office Copy.

District Education Officer (Female)  
Chitral.

DEO (F)  
Chitral

ATTESTED

Annexure (9)

P-119

DIRECTORATE OF ELEMENTARY &  
SECONDARY EDUCATION KHYBER  
PAKHTUNKHWA PESHAWAR

NO. 4088 /A-12/Posting Transfer/ Vol-32

DATED PESHAWAR THE 27/11/2016

To

The Secretary to Government of Khyber Pakhtunkhwa  
Elementary & Secondary Education Department

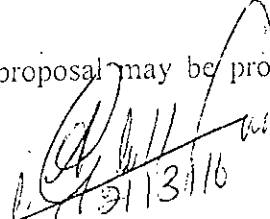
Subject: - **CORRIGENDUM** Proposal

Dear Sir,

I am directed to enclose herewith a certificate received from DEO (F) Chitral vide No.7075 dated 19/3-2016 in r/o Mst. Nasira Batool SST GGMS Kujju Chitral who has recently promoted as H/M B-17 vide Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department Notification No. SO (PE)/2-6/DPC Meeting (13-10-2015) dated 17/03/2016 at S.No.85 and adjusted at GGHS Danen Chitral, but the said post has already been filled. Therefore the following proposal is submitted for necessary corrigendum in respect of Nasira Batool H/M please.

S.No.	Name & Designation	As Proposed	Remarks
1	Mst. Nasira Batool SST GGMS Kujju Chitral under adjustment as H/M B-17 at GGHS Danen Chitral	H/M B-17 GGHS Awi Chitral	A.V.P.

Therefore, it is requested that the above mentioned proposal may be processed please.


  
27/11/16  
Deputy Director (Female)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

  
**ATTESTED**



CP-15

Annexure (H)

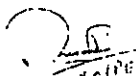
	<b>GOVERNMENT OF KHYBER PAKHTUNKHWA ELEMENTARY &amp; SECONDARY EDUCATION DEPARTMENT</b>
	<b>Dated Peshawar the 16-05-2016</b>

**CORRIGENDUM**

**No.SO(PE)/2-6/DPCMeeting (13/10/2015):** In partial modification of this Department Notification of even number dated 17/03/2016, the following officers are hereby posted and adjusted as mentioned against each:

S.No	SL#	Name of Officer	Already Adjusted at	Proposed As	Remarks
1.	92	Mst. Abida Jabeen	H/M B-17 GGHS Khattak Nowshera	H/M B-17 GGHS Jamroz Khan Killay Charsadda	Against vacant post
2.	129	Mst. Zahida Parveen	H/M B-17 GGHS Malach A/Abad	H/M B-17 GGHS Namli Mera A/Abad	Against vacant post
3.	402	Mst. Shagufta Yasmin	H/M BS-17 GGHS Sari Haripur	H/M B-17 GGHS Jareed Manshra	Against vacant post
4.	227	Mst. Nasira Bano	H/M B-17 at GGHS Danen Chitral	H/M B-17 GGHS Awi Chitral	Against vacant post
5.	135	Mst. Najma Begum	H/M GGHS Kohi Barmal Mardan	H/M B-17 GGHS Fatima Mardan	Against vacant post
6.	65	Mst. Dilshad	H/M B-17 GGHS Sanga Gul Ahmad Mardan	H/M B-17 GGHS Muhammad Wali Killay Mardan	Against vacant post
7.	172	Mst. Perveen Waris	H/M B-17 GGHS Parshai Kohat	H/M B-17 GGHS Khadar Khel Kohat	Against vacant post
8.	159	Mst. Sahira Bano	H/M B-17 GGHS Totai Malakand	H/M B-17 GGHS Qaldara Malakand	Against vacant post
9.	227	Mst. Rozina Itmiaz	H/M B-17 GGHS Deli Mela Karak	H/M B-17 GGHS Jehangiri Karak	Against vacant post
10.	23	Mst. Tabassum Mehmood	H/M B-17 GGHS Shawa Dir Lower	H/M B-17 GGHS Talaiscya Dir Lower	Against vacant post
11.	350	Rashida Begum,	H/M B-17 GGHS Ziam Dara Dir Lower	H/M B-17 GGHS Kodigram Dir Lower	Against vacant post
12.	57	Mst. Murshida	H/M B-17 GGHS Pajman Swabi	H/M B-17 GGHS Kalu Dher Swabi	Against vacant post
13.	131	Mst. Iqbal Tawab	H/M B-17 GGHS Ahmad Abad Karak	H/M B-17 GGHS Surdag Karak	Against vacant post
14.	151	Mst. Tohida Begum	H/M B-17 GGHS Machai Mardan	H/M B-17 GGHS Chamdheri Mardan	Against vacant post
15.	96	Mst. Hussan Ara	H/M B-17 GGHS Tano Swabi	H/M B-17 GGHS Sarwar Shah Kotai Swabi	Against vacant post
16.	106	Mst. Tasleem Begum	H/M B-17 GGHS Chenglai Bunir	H/M B-17 GGHS Dagai Bunir	Against vacant post
17.	106	Mst. Baswar Jan	H/M B-17 GGHS Kotka Daulat Khan Bannu	H/M B-17 Dheri Ghandi Esnki Bannu	Against vacant post
18.	123	Mst. Bibi Aisha	H/M B-17 GGHS Senazo Shah Charsadda	H/M B-17 GGHS Uchn Wala Charsadda	Against vacant post
19.	41	Mst. Badar Shaheen	H/M B-17 GGHS Mainki Banda Karak	H/M B-17 GGHS Gul Imam Tank	Against vacant post
20.	21	Mst. Sultana Sadbar	H/M BS-17 GGHS Gwalera Swat	H/M B-17 GGHS Ningolai Swat	Against vacant post
21.	77	Mst. Robina Shaheen	H/M BS-17 at GGHS Gul Muhammad Abad Battagram	H/M B-17 GGHS Gandian Haripur	Against vacant post
22.	78	Mst. Attiya Sultana	H/M BS-17 GGHS Shamlai Battagram	H/M B-17 GGHS Kohala Bala Haripur	Against vacant post

  
**ATTES**

  
 2016

23.	246	Mst. Asma Shaheen	HM BS-17 GGHS Ajmira Battagram	H/M B-17 GGHS Hamlet Swabi.	Against vacant post
24.	215	Mst. Samina Rauf	H/M B-17 GGHS Tikri Kharari Battagram	HM B-17 GGHS Bandi Sceran Haripur	Against vacant post
25.	225	Mst. Fatima Gul	H/M BS-17 GGHS Haryankot Malakand	H/M BS-17 GGHS Dobandi Malakand	Against vacant post
26.	345	Mst. Yasmin Akhtar	H/M BS-17 GGHS Spal Bandi Swat	H/M B-17 GGHS Jambail Swat	Against vacant post
27.	362	Mst. Faiqa Naseem	H/M BS-17 GGHS Katakot Mardan	H/M B-17 GGHS Khana Khel Nowshera	Against vacant post
28.	272	Mst. Naseem Begum	H/M BS-17 GGHS Kala Killy Swat	H/M BS-17 GGHS Chakesar, Shangla	Against vacant post
29.	150	Mst. Bibi Grana	H/M BS-17 GGHS Shodag Charsadda	H/M BS-17 GGHS Boobak, Charsadda	Against vacant post
30.	269	Mst. Safia Rauf	H/M BS-17 GGHS Mula Killy Nowshera	H/M BS-17 GGHS Khat Killy, Nowshera	Against vacant post
31.	427	Mst. Roshan Ara	H/M BS-17 GGHS Nara Banda, Karak	H/M BS-17 GGHS Wanda Lali, D.I.Khan	Against vacant post
32.	433	Mussarat Jehan, SET, MA BEd	H/M B-17 GGHS Mian Khan Mardan	H/M B-17 GGHS Mian Khan Mardan	Against vacant post. She has retired from service on superannuation basis on 14.12.2015, while the DPC was held on 13.10.2015 thus she is promoted w.e.f. date of DPC, in light of Establishment Department Instructions SO(R-VI)E&AD1-16/2005 dated 22.03.2006
33.	119	Saeeda Wali SET D/O Saif ur Rehman BA Bed SET GGHS No.2 Peshawar Cantt.	H/M B-17 GGHS Shagi Bala, Peshawar.	May be read as Saeeda Wali HM BS-17, GGHS Shagi Bala, Peshawar instead of Sadia Wali	As amended

2. No. TA /DA allowed.

SECRETARY

Endst. No. & date as above.

Copy to:

1. The Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department.
2. The Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department.
3. The Accountant General Khyber Pakhtunkhwa, Peshawar.
4. PSO to Chief Secretary to Govt. of Khyber Pakhtunkhwa.
5. The Director (E&SE) Khyber Pakhtunkhwa Peshawar.
6. The Director Education FATA, Warsak Road, Peshawar.
7. The Director Curriculum & Teachers Education, Abbottabad.
8. The Director ESRU, Khyber Pakhtunkhwa.
9. The Deputy Director (EMIS), E&SE Department, with the request to upload the corrigendum on E&SE Department website.
10. The District Education Officers, Elementary & Secondary Education concerned.
11. The District Accounts Officers concerned.
12. PS to Secretary E&SE Department.
13. Headmistress concerned.
14. Office File.

(MUHAMMAD NASIR KHAN)  
SECTION OFFICER PRIMARY

**ATTESTED**

**GOVERNMENT OF NWFP  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT**

Dated Peshawar the 26.2.2010.

**NOTIFICATION**

No.SO(S)E&SE/4-16/2009/Bibi Haleema. The competent authority is pleased to order the posting/transfer of the following Subject Specialists of Elementary & Secondary Education Department in the interest of public service, in relaxation of ban with immediate effect *as a stop gap arrangement:-*

S.No.	Name of officer	From	To
1	Bibi Haleema, SS(Islamiyat) BS-17	GGHSS Rabat Lower Dir	H/M GGHS Kaghazi Chitral against vacant post.
2	Habiba, SS(urdu) BS-17	GGHSS Rabat Lower Dir	H/M GGHS Boni Chitral against vacant post.

2- No TA/DA is allowed.

**SECRETARY**

**ENDST: NO. & DATE EVEN.**

Copy to :-

- 1- The Accountant General NWFP Peshawar.
- 2- The Director E&SE NWFP, Peshawar.
- 3- Executive District Officer (E&SE) concerned.
- 4- District Accounts Officer concerned.
- 5- DDBA E&SE Deptt.
- 6- PS to Minister for E&SE NWFP.
- 7- PS to Secretary E&SE Dept.
- 8- PA to Addl. Secretary (E&SE) Dept.
- 9- Officers concerned.
- 10- Office order.

**ATTESTED**

*[Signature]*  
Section Officer (Schools)

**BEFORE THE KHYBER PAKHTUNKHUWA SERVICE**  
**TRIBUNAL PESHAWAR**

In

Service Appeal No. 857/2016

Mst.Nasira Batool

**VERSUS**

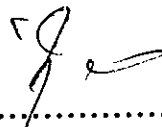
Government of KPK through Chief Secretary and others

**INDEX**

S.No.	Description of Documents	Annexure	Pages
1	Grounds of Petition for vacation of stay		1-2
2	Affidavit		3
3	Copy of Impugned Office orders	"A"	4-7
4	Wakalat Nama		8

Respondent No. 2

Through

  
.....  
Syed Ghufuran ullah Shah  
(Advocate Peshawar)  
Office; 22-A Nasir Mansion  
Railway Road, Peshawar  
Cell No.0334-9185580

**BEFORE THE KHYBER PAKHTUNKHUWA SERVICE**  
**TRIBUNAL PESHAWAR**

Re In;  
Service Appeal No. 857/2016

**Mst. Nasira Batool**

**V E R S U S**

Government of Khyber Pakhtunkhwa (KPK) through Chief Secretary at  
Civil Secretariat Peshawar and others

**APPLICATION FOR AND ON BEHAF OF RESPONDENT**  
**NO.2 WITH EFFECT TO SET ASIDE THE IMPUGNED**  
**OFFICE ODRERS DATED 8/11/2016 & 9/11/2016**  
**FOLLOWED BY ORDER FOR RELEASE OF SALARIES**  
**OF THE APPELLANT/PETITIONER AND TO STAY/STOP**  
**SALARY OF THE PRESENT PETITIONER/RESPONDENT**  
**NO.2.**

Respectfully Sheweth;

Brief facts and grounds giving rise to the instant Petition are as under;

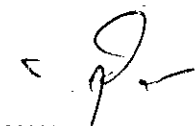
1. That the subject Service Appeal is pending for adjudication before this Honorable Tribunal and fixed for today i.e 14-12-2016.
2. That the appellant Mst. Nasira Batool has challenged the corrigendum order dated 16-05-2016 issued by respondent No. 1/secretary Education with effect to transfer of the appellant from GGCMS Danin Chitral to GGHS Awi Chitral due to occupation of the post by the present petitioner/respondent No.2.
3. That on 17-10-2016 vide order/judgment of this honourabel Tribunal meanwhile status quo was maintained.
4. That as per law and procedure both the parties were to remained in their respective posts as they were on 17-10-2016.

5. That respondent No. 3/DEO (Female) Chitral has deliberately disobeyed the afore mentioned status quo order and for the reason best known to her ~~past~~<sup>passed</sup> impugned orders on 08-11-2016 & 09-11-2016.  
**(Copy of the impugned orders dated 08-11-2016 & 09-11-2016 are annexed as Annexure "A")**
6. That the afore mentioned office orders are void and illegal and have been passed with malafide intentions.
7. That legally speaking respondent No.3 has deliberately and intentionally contempt this honourable Tribunal hence; entitled to show cause and punishments as per relevant laws.
8. That besides being illegal and haphazard the impugned orders are in effective upon the substantial rights of the present petitioner/respondent No.2.

It is, therefore, most humbly prayed that on acceptance of the instant petition the impugned office orders issued by respondent No.3 be set aside and salaries of the present petitioner/respondent No.2 be released and any other relief deems just and proper which has not been prayed specifically may also be granted.

**Respondent No.2**

**Through**

  
.....  
**Syed Ghufan ullah Shah**  
**(Advocate Peshawar)**

**BEFORE THE KHYBER PAKHTUNKHUWA SERVICE  
TRIBUNAL PESHAWAR**

In

Service Appeal No. 857/2016

Mts.Nasira Batool

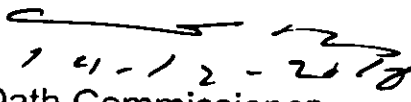
**VERSUS**

Government of KPK through Chief Secretary and others

**AFFIDAVIT;**

I, Syed Ghufraan ullah Shah Advocate, Counsel of respondent No.2, do hereby solemnly affirm and verify that all the contents of the application; as conveyed by my client (Mst. Atia Faizi/Respondent No.2); are true and correct to the best of my knowledge and belief.

  
Counsel

  
Oath Commissioner  
Eid Muhammad Khattak (ASC)  
License No.961/14-4-2014  
Peshawar High Court Peshawar  
CNIC: 17301-7401834-5

مست. ناسیرہ باتوول  
کے لیے حکم  
14271-72

OFFICE OF THE  
DISTRICT EDUCATION OFFICER,  
(FEMALE) CHITRAL.

No. / F.No. A-1/ES (F)  
Dated Chitral the 8/7/2016

To,

Mst. Nasira Batool, Headmistress,  
Under transfer to GGCMHS Danin Chitral.

Subject: STATUSQUO.  
Memo:

As per decision of Service Tribunal Khyber Pathnukhwa Peshawar, appeal No. 857/2016 Mst. Nasira Batool V/S Govt.:

Your previous order No. SO(PE)/2-6/DPC Meeting dated 13/10/2015 and notification issued on 16/05/2016 has been statusquo, therefore you are directed to take over charge in Govt: Girls Centennial Model High School Danin Chitral in the light of Court decision dated 17/10/2016.

Endst No. 14271-72

*[Signature]*  
District Education Officer,  
(Female) Chitral.

Copy forwarded to the:-

1. District Accounts Officer, Chitral for information, please.
2. Mst. Attia Faizi, HM, GGCMHS Danin Chitral for information.

*[Signature]*  
District Education Officer,  
(Female) Chitral.

*[Signature]*  
**ATTESTED**



No \_\_\_\_\_ /P&D (F) Dated Chitral, the \_\_\_\_\_ /2016.  
From:-

To:- The District Education Officer,  
(Female) Chitral.

The District Accounts Officer,  
Chitral.

Subject:- Release of Pay in respect of Nasira Batool, Headmistress, GGCMHS, Danin Chitral.

Memo:-

On the subject cited above it is stated that the honorable Court of Service Tribunal Peshawar has granted status quo on her previous order as Headmistress, GGCMHS, Danin Chitral and allowed her to perform her duties as H/Mistress, GGCMHS, Danin Chitral (Copy attached for ready reference).

Therefore, you are requested to kindly release her pay as H/Mistress, GGCMHS, Danin, Chitral.

*sd*  
District Education Officer,  
(Female) Chitral.

Endst: No 14345-46 /P&D (F)

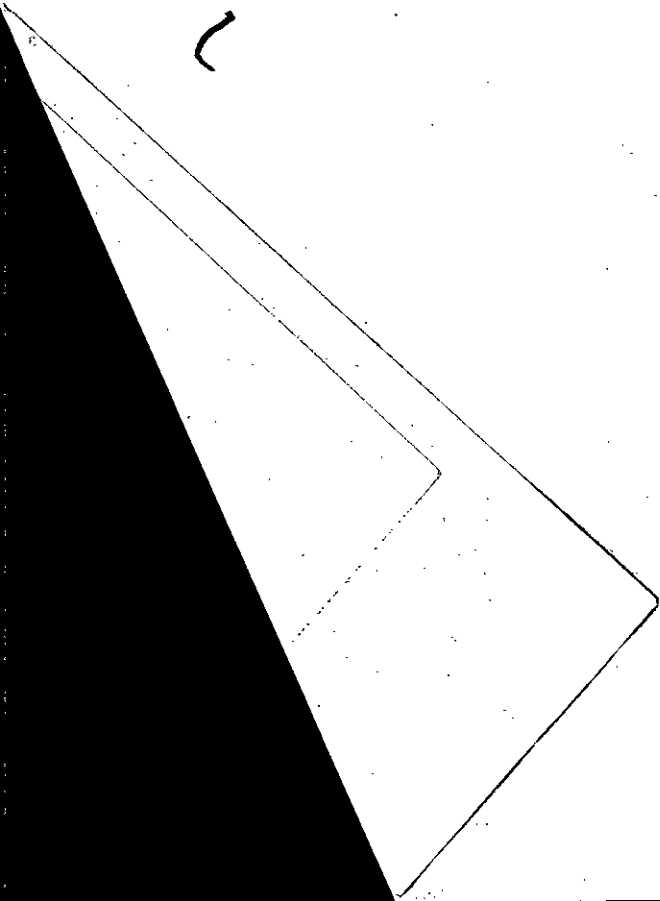
Dated Chitral, the 9/11/2016

Copy forwarded to the:-

1.  Nasria Batool, Headmistress, GGCMHS, Danin with the direction to submit her arrival report to this office for further N/A, please.
2.  Atia Faizi Ex-Headmistress, GGCMHS, Danin with the direction to report to the Provincial Directorate of Education (E & S) Khyber Pakhtunkhwa, Peshawar for her adjustment, please.

*[Signature]*  
District Education Officer  
(Female) Chitral

*[Signature]*  
**ATTESTED**



2

01111111

P-6

FORM: PAS 02

Date

Page No.

PAYROLL SYSTEM  
AMENDMENT FORM  
SINGLE EMPLOYEE ENTRY

Principal G.G.C.MHS Danim Chitra

OFFICE OF THE \_\_\_\_\_  
FOR THE MONTH OF \_\_\_\_\_ 200

DDO Code (Cost Center) 6. L 6 0 9 4

Description Principal G.G.C.MHS Danim

Personnel Number 0 0 3 3 0 1 0 4

Employee Name Nasir Bator

National ID Card Number 15201-0541602-8

Salary Status  Start  Stop

Grade (Pay Scale Group) "N7" H/M

GENERAL DATA CHANGE			CHANGE IN PAYMENTS / DEDUCTIONS							Effective Date	Remarks
Info Type	Field ID	How Contents	Wage Type	Amount			Paise	Adj			
		Position code									
		H/M (80108063)									

Principal  
G.G.C.MHS Danim  
Chitra

ATTESTED

Entered / Verified By

P-7

PAYROLL SYSTEM  
AMENDMENT FORM  
SINGLE EMPLOYEE ENTRY

FORM: P-702

Date

Page No.

OFFICE OF THE

Principal G. CHMS Damin

FOR THE MONTH OF

11 2006

DDO Code  
(Cost Center)

PL6094

Description

Prin. G. CHMS Damin

Personnel  
Number

00523925

Employee  
Name

Atta Faiza

National ID  
Card Number

Grade (Pay  
Scale Group)

17 BPS 17

Salary  
Scale

Start

Stop

GENERAL DATA CHANGE			CHANGE IN PAY/FINIS / DEDUCTIONS							Effective Date	Remarks
Info Type	Field ID	How Contents	Wage Type	Amount			Paise	Adj			
				Rupoo							
											Pay stop

*[Signature]*  
Principal  
G. CHMS Damin  
Principal

*[Signature]*  
ATTESTED

Entered / Verified By

**BEFORE THE CHAIRMAN SERVICE TRIBUNAL,**  
**PESHAWAR.**

Service Appeal No.857 /2016

Mst. Nasira Batool.....**Appellant**

**V/S**

Govt. of KPK through Secretary E&D Peshawar and  
others.....**Respondents**

**Service Appeal**

---

**REJOINDER TO PARA-WISE COMMENTS/REPLY.**

**Respectfully Sheweth**

**PRELIMINARY OBJECTIONS:**

Preliminary objections NO.1 to 9 of the comments are incorrect hence denied.

- 1) Para No.1 needs no comments.
- 2) In reply to Para No.2 which is denied to the extent of post occupancy, it is to state that as is evident from Annex B of appeal issued by Do (Female) that the post in question was vacant and thus the appellants was rightly posted on the said post. The said certificate was issued by first class officer and it can not be imagined to be fake and bogus. Respondent No.2 cannot take such plea without any evidence further more, the posting of respondent No.2 was "wrong Posting" being

a subject specialist and thus she cannot be posted as principal which is against the law on the subject.

- 3) Para No.3 of the comments is incorrect. The appellant assumed the charge as principal in accordance with law as respondent No.2 was not posted as principal being a Subject Specialist. The assertion of Respondent No.2 regarding the charge assumption and pay slip is complete lie and based on imaginations as no relevant documents were attached by Respondent No.2 in order to substantiate her plea of fabrication etc.
- 4) Para No.4 of the comments is incorrect the certificate attached with the comments as Annex-F is fake and fabricated on as the it has been signed by A.D.E.O (female) a grade (16) employee namely (shakeela Anjum) who is not authorized to signed any order/certificate on behalf of D.E.O. Further more the same certificate has been issued due to the political pressure as respondent No.2 is the wife of Assistant Commissioner Chitral as is Evident from the same certificate. Copy of Certificate is attached as Annex-A. A.D.E.O being a grade 16 employee cannot issue any certificate regarding grade 17 post).
- 5) Para No.5 is incorrect detailed reply given in the preceding Para.
- 6) Para No.6 of the comments is denied the appellant filed departmental appeal. Further more the same was sent by D.E.O (Female) Chitral to Director (E&SE) Peshawar

vide letter dated 22.06.2016 which is attached here with as Annex-B.

7) Para No.7 of comments needs no reply.

**ON GROUNDS:**

- A. Ground (A) of the comments denied, detailed rely given in the above mentioned Paras.
- B. Ground (B) of comments denied.
- C. Ground (C) denied. The posting of appellant is/ was according to law, rather the posting of respondent No.2 was against law and rule on the subject.
- D. Ground (D) denied. The corrigendum was against the rules and regulation and thus needs to be struck down.
- E. Ground (E) denied.
- F. Ground (F) denied. The posting of respondent No.2 is against law. Respondent No.2 cannot take the plea that one illegality can cure further illegality or one wrong can make other wrong as legal. The documents attached with the main appeal are also supporting the case of the appellant.
- G. Ground (G) of the comments denied as husband of the appellant is also working as Head Master in G.H.S KuJu in u/c Dannin and thus it is in accordance with law that the posting of appellant should also be made in the same district which was done by the official respondents in accordance with law.

H. Ground (H) denied and incorrect.

I. Ground (I) denied.

J. Ground (J) is incorrect hence denied.

It is, therefore, pray that the appeal of appellant may please be accepted as prayed in the main appeal.

Petitioner

Through



**Barrister Kamran Qaiser**  
Advocate  
High Court, Peshawar

AFFIDAVIT:

I, do hereby affirm and declare as per information furnished by my clients that the contents of the accompanying Rejoinder are true and correct to the best of my knowledge and nothing has been concealed from this Hon'ble Court.

Deponent





Annexure (A)

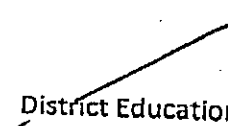
OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) CHITRAL

NO 7075 DEOF/C

DATED 19-3-2016.

VACANCY CERTIFICATE


It is certified that the post of Headmistress of GGHS Danin Chitral is not vacant and has already been occupied by Atia Faizi (senior S.S BPS-17) under spouse policy as her husband is posted here Chitral as Assistant Commissioner Chitral. However posts of Headmistresses of GGHS Mastuj Chitral and etc.. are still lying vacant.

  
District Education Officer (Female)  
Chitral.

C.C

- 1) Secretary E&SE to the Govt: of KPK at Peshawar.
- 2) Director E&SE KPK at Peshawar.
- 3) Headmistress GGHS Danin Chitral.
- 4) Office Copy.

  
ATTESTED

  
District Education Officer (Female)  
Chitral.

**DEO (F)**  
**Chitral**

Annex (B)

Office of the District Education Officer,  
(Female) Chitral.

No. \_\_\_\_\_ / F.No. A-1/SSTs/EB (F).  
Dated Chitral the 12 / 6 / 2016

To,

The Director,  
Elementary & Secondary Education  
Khyber Pakthunkhwa Peshawar.

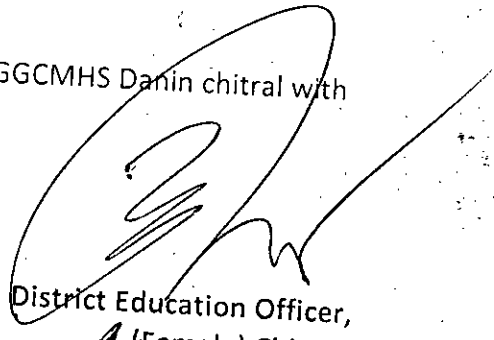
Subject:- APPEAL.  
Memo:-

Enclosed, herewith please find an appeal in respect of Mst. Nasira Batool,  
Principal, GGCMHS Danin Chitral under transfer to GGHS Awi Booni through corrigendum  
addressed to your good self through this office for further necessary action, please.

District Education Officer,  
(Female) Chitral.

Endst No. 10810

Copy forwarded to the Mst. Nasira Batool, Principal, GGCMHS Danin Chitral with  
reference to her No. 807 dated 13/06/2016.

  
District Education Officer,  
(Female) Chitral.



Office of the District Education Officer Female Chitral.

No. 16124 /F:No.EB(F) Chitral.

Dated Chitral, the 31 / 12 / 2016.

To,

The Honourable Secretary Education,  
E&S Education Department,  
Govt: of Khyber Pakhtunkhwa.

Subject: - Release of Pay Mst. Atia Faizi Subject Specialist Chemistry.

Memo: - Reference your Office letter No. SO (S/F) E&SED/4-17/2016Mst. Atia Faizi/HM/ Chitral dated Peshawar December 20<sup>th</sup>, 2016. I have the honour to brief report as under.

That one Mst. Nasira Batool was promoted to the post of Headmistress B-17 (Regular) and posted against vacant post of Headmistress at Govt: Girls Centennial Model High School Denin Chitral vide your Office **Notification No.SO(PE)/2-6/DPC meeting (13/10/2015) dated Peshawar 17/03/2016**. She assumed the charge of the HM Post. At time of DPC Female SSTs (B-16) to the Post of Headmistress (B-17) this Office the Schools wise vacancy statement submitted as stood on 15/08/2015, the post of HM at GGCMHS Denin was shown vacant. Because one Atia Faizi Subject Specialist Chemistry was adjusted here as Headmistress against wrong Post vide your Office **Notification No. SO(S/F)E&SE/4-16/2014/Atia Faizi SS Dated January 24<sup>th</sup>, 2016** of Transferred/adjustment. (Notification Copy attached).

That after two month through a corrigendum vide your Office Notification No. SO(PE/2-6/DPC meeting dated 13/10/ 2016 Nasira Batool HM was proposed as HM against vacant Post at GGHS Awi Booni at Tehsil Mastuj District Chitral. (**copy attached**) Being aggrieved by the Corrigendum Nasira Batool **appealed** in Service Tribunal Peshawar against the **corrigendum** dated **16/05/2016 vide appeal No.857/16 dated 01/08/2016**. The Service Tribunal Govt: of Khyber Pakhtunkhwa vide its **Order dated 17/10/2016** observed that the retaining of Atia Faizi SS at GGCMHS Denin Chitral as **mala-fide** and status-quo was granted in the favour of Nasira Batool. (Copy of service tribunal order is attached)

That in the light of Service Tribunal Order of Service Tribunal Peshawar the Pay of Nasira Batool was released, as salary of two individual against one Post was not possible. In this regard a letter to Director of Education for guidance to undersigned vide this Office **No.14186/F:No.A-1/EB(F) dated Chitral 03 /11/2016**, and the reply is still awaited. (Copy attached)

Sir! It is for your kind information that, I have been transferred from Dir Upper to Chitral District as DEO (Female) vide your Office Notification No. **No.SO(S/F)E&SE/4-16/2016/Placement Committee**, dated Peshawar **24<sup>th</sup> November 2016**, and I assumed the charge of the Post dated on 27<sup>th</sup> November 2016. The incident is very before of my charge acceptance as DEO (F) position.

It is further added that direct correspondence of Atia Faizi to honourable Secretary is tantamount to misconduct in light of memo of Director of E&SE Department Vide No. **4374-4424** dated 22/03/2016.

Therefore, it is requested that Mst. Atia Faizi SS Chemistry may kindly be posted in her original post of Subject Specialist Chemistry, please.

District Education Officer  
(Female) Chitral  
District Education Officer  
(Female) Chitral



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

Dated Peshawar the January 11<sup>th</sup>, 2017

**NOTIFICATION**

**NO. SO(S/E&S)/4-16/2016/General Posting Transfer:** The following posting/transfer of Principals/ Headmistresses/ Subject Specialists of Elementary & Secondary Education Department are hereby ordered against the posts noted against each in the interest of public service with immediate effect: -

S#	Name & Designation	As Proposed	Remarks
1	Mst. Rashida Begum SS (Chem) BS-17 GGHSS Harichand Charsadda	SS (Chem) BS-17 GGHSS Haryankot Malaknd	Against vacant post
2	Mst. Robina SS (Pak Study) BS-17 GGHSS Baghicha Dheri Mardan	SS (Pak Study) BS-17 GGHSS Rustam Khel Mardan	-do-
3	Mst. Syeda Inam Javid SS (PS) BS-17 working against BS-18 post (wrong posting) GGHSS Havelian A/Abad	SS (Pak Study) BS-17 GGHSS Kiri Raiki A/Abad	-do-
4	Mst. Sabahat Yousaf SS (Econ) BS-17 working against BS-18 post GGHSS Shabqadar Fort Charsadda	SS (Econ) BS-17 GGHSS Larana Peshawar	-do-
5	Mst. Shakila Bibi, SS (History-cum-Civics) BS-17 GGHSS Dingi Haripur (due for promotion to BS-18)	Principal (BS-18) GGHSS Ghari Phulgram A/Abad	Against vacant post in her own pay & scale
6	Mst. Afshan Shah SS (Econ) BS-17 GGHSS Odigram Swat	SS (Econ) BS-17 GGHSS No.1 Saidu Sharif Swat	Against vacant post
7	Mst. Mansooria Norin H/M BS-17 GGHSS Yagooobi Swabi	H/M BS-17 GGHSS Khoida Khel Badaber Peshawar	-do-
8	Mst. Saiqa Iqbal SS (His-cum-civics) BS-17 GGHSS Ismail Maima Khel Bannu	SS (His-cum-civics) BS-17 GGHSS Dheri Saidan Bannu	-do-
9	Mst. Rana Gul SS (Maths) BS-17 GGHSS Rustam Mardan	SS (Maths) BS-17 GGHSS Gujrat Mardan	-do-
10	Mst. Sadaqat Nasreen H/M BS-17 GGHSS Kityari Dir Lower	H/M BS-17 GGHSS Bajawro Dir Lower	-do-
11	Mst. Sehrish Razzoq SS (Stat) BS-17 working against SS (His-cum-civics) post) wrong posting GGHSS Kulachi Dikhan	SS (Stat) BS-17 GGHSS Kulachi Dikhan	-do-
12	Mst. Asara Bibi SS (Pashto) BS-17 GGHSS Pabbi Nowshera	SS (Pashto) BS-17 GGHSS Chamkani Peshawar	-do-
13	Mst. Anis Faris SS (His-cum-civics) BS-17 working as H/M (BS-17) GGHSS Datta Chitral	SS (His-cum-civics) BS-17 GGHSS Hayatabad Peshawar	Against vacant post stop grp arrangement basis
14	Mst. Tahira Shahreen H/M BS-17 GGHSS Bashir Khan Qilla	H/M BS-17 GGHSS Athat Korona Mashogagar	Vice Sr. No. 14

S#	Name & Designation	As Proposed	Remarks
16	Mst. Farzana Bano H/M BS-17 Arhat Koroonna Mashogagar Peshawar	HM (BS-17) GGHS Qasab Khana Peshawar	Against vacant post
17	Mst. Parveen Sultana SS (Chem) BS-17 GGHS Koti Sadat Bannu	SS (Chem) BS-17 GGHS Lachi Kohat	Vice S.No. 19
18	Mst. Nishat Bibi, SS (Chem) BS-17 GGHS Lachi Kohat	SS (Chem) BS-17 GGHS Togh Bala Kohat	Against newly sanctioned post
19	Mst. Ambra Durrani H/M BS-17 GGHS Sheikhho Sardheri Charsadda	H/M BS-17 GGHS Nelavi Peshawar	Against vacant post
20	Mst. Sabahat Bashir SS (Home Econ) BS-17 GGHS Toru Mardan	SS (Home Econ) BS-17 GGHS Dheri Kati Khel Nowshera	Against newly sanctioned post
21	Mst. Shahida Begum H/M BS-17 GGHS Tordher Swabi	H/M BS-17 GGHS Tano Swabi	Against vacant post
22	Mst. Nasreen Begum SS (Islamiyat) BS-17 GGHS Teri Karak	SS (Islamiyat) BS-17 GGHS Togh Bala Kohat	Against newly sanctioned post
23	Mst. Anjum Naz H/M (MA Islamiyat) BS-17 GGHS Ayub Nurar Bannu	SS (Islamiyat) BS-17 GGHS No.9 Dinpur DIKhan	Against vacant post on stop gap arrangement basis
24	Mst. Mehvish Munsif SS (Stat) BS- 17 GGHS Panian Haripur	SS (Stat) BS-17 GGHS Kiri Raiki A/Abad	Against vacant post
25	Mst. Mubassira Qazi SST BS-16 GGHS Zaida Swabi (due for promotion to B-17)	IC H/M BS-17 GGHS Manki Swabi	A.V.P in her own pay & scale
26	Mst. Zahida Parveen H/M BS-17 GGHS Mulazai Tank	Sr. IT (BS-17) RITE (F) D.I.Khan	Against vacant post on stop gap arrangement basis
27	Mst. Musarrat Nazir H/M BS-17 GGHS Hassa Mansehra	Vice Principal BS-17 GGHS Balakot Mansehra	Against vacant post
28	Mst. Khair-un-Nisa H/M BS-17 (MA Islamiyat) GGHS Teri Bezin Khel Bannu	SS (Islamiyat) BS-17 GGHS Daraban Kalan DIKhan	Against vacant post on stop gap arrangement
29	Mst. Anila Ashraf SS (Stat) BS-17 GGHS Dheri Saidan Mamashkhal Bannu (due for promotion to BS-18)	SS (Stat) BS-18 GGHS Ghoriwala Bannu	Against vacant post in h own pay & scale
30	Mst. Mazhar Danish SS BS-18 (due for promotion to BS-19) DCTE Abad	Principal BS-19 GGHS Mirpur A/Abad	Against vacant post
31	Mst. Najia Ambreen Inst: BS-18 RITE (F) DIKhan	Principal BS-18 GGHS Bilot Sharif DIKhan	Against Vacant Post
32	Mst. Zahida SS (Maths) BS-18 GGHS Chamkani Peshawar	Principal BS-18 GGHS Tarnab Form Peshawar	Vice Mst. Dur-e-Shay Principal GGHS Tarnab Form Peshawar who going to retire from service on 14/01/20
33	Mst. Shehreen Begum Principal BS-18 (MSc Econ) GGHS Hassan Zai Charsadda	SS (Gen) BS-18 GGHS Peshawar	Against vacant post on to transfer of Mst. Na Nadia, on stop gap arrangement

3. The orders of SS/ SST appearing at Sr. No. 5, 26 & 30 will be effective subject to the condition that they will give an undertaking/ Affidavit on legal/ stamp paper to Secretary E&SE/ Directorate E&SE Peshawar to the effect that they will not claim benefits of grade pay and seniority of the higher pay scale.

**SECRETARY**

Endst: of even No. & date:

Copy forwarded to the:-

1. Accountant General Khyber Pakhtunkhwa, Peshawar.
2. Principal Secretary to Chief Minister Khyber Pakhtunkhwa Peshawar.
3. Director E&SE Khyber Pakhtunkhwa, Peshawar.
4. Director DCTE Abbottabad.
5. District Education Officers (I) Charsadda, Malakand, Mardan, Abbottabad, Haripur, Swat, Swabi, Bannu, Dir Lower, D.I.Khan, Nowshera, Chitral, Kohat, Karak, Tank, Manshara, Peshawar.
6. District Accounts Officers Charsadda, Malakand, Mardan, Abbottabad, Haripur, Swat, Swabi, Bannu, Dir Lower, D.I.Khan, Nowshera, Chitral, Kohat, Karak, Tank, Manshara, Peshawar.
7. In charge FMIS, E&SE Department for uploading at official website.
8. PS to Minister for E&SE, Khyber Pakhtunkhwa.
9. PS to Secretary E&SE Department.
10. Principals/ Headmistresses/ Subject Specialists concerned.
11. Office order file.

(LAL SAEED KHATTAK)

SECTION OFFICER (SCHOOLS FEMALE)

2/1/17

KHYBER PAKHTUNKWA SERVICE TRIBUNAL, PESHAWAR

No. 1726 /ST

Dated 21 / 7 / 2017

To


The Secretary E&SE Department,  
Government of Khyber Pakhtunkhwa,  
Peshawar.

Subject: -

JUDGMENT IN APPEAL NO. 857/2016, MST. NASIRA BATOOL.

I am directed to forward herewith a certified copy of Judgement dated 7.07.2017 passed by this Tribunal on the above subject for strict compliance.

Encl: As above

  
REGISTRAR  
KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL  
PESHAWAR.