08.08.2018

Appellant Behreen Bibi in person present. Mr. Shah Saud, Assistant alongwith Mr. Muhammad Jan, DDA for respondents present. Appellant made a request for adjournment as her counsel is not available today. Granted. To come up for arguments on 04.10.2018 before D.B.

Member

Chairman

04.10.2018

Learned counsel for the appellant and Mr. Muhammad

Jan learned Deputy District Attorney present.

Learned counsel for the appellant stated that in view of the promotion of the appellant vide order dated 06.10.2017, the grievance of the appellant has been partially redressed and that since the order of promotion was issued with immediate effect, the appellant intends to file fresh appeal against the promotion order.

In view of the above, the present service appeal is dismissed having become infructuous. The appellant is at liberty to file fresh appeal under the law and rules on the subject. No order as to costs. File be consigned to the record room.

(Hussain Shah)

Member

(Muhammad Hamid Mughal)

Member

ANNOUNCED. 04.10.2018

07.02.2018

Learned counsel for the appellant and Mr. Muhammad Jan, Learned Deputy District Attorney for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 12.04.2018 before D.B.

(Gul Zeb **MEMBER**

(Muhammad Hamid Mughal) **MEMBER**

12.04.2018

Appellant in person present. Addl. AG respondents present. Counsel for the appellant is not in attendance. Appellant seeks adjournment. Granted. To come up for arguments on 28.06.2018 before the D.B.

Member

28.06.2018

Appellant in person and Mr. Muhammad Jan, Deputy District Attorney for the respondents present. Appellant seeks adjournment as her counsel is not in attendance. Adjourned. To come up for arguments on 08.08.2018 before D.B.

(Muhammad Amin Kundi) Member

(Muhammad Hamid Mughal) Member

04.04.2017

Counsel for the appellant and Mr. Kabir Ullah Khattak, Assistant AG for the respondents present. Argument could not be heard due to incomplete bench. To come up for final hearing on 19.06.2017 before D.B.

Chairman

19.06.2017

Appellant present in person. Mr. Ziaullah, Deputy District Attorney for the respondents present. Arguments could not be heard due to learned member executive is on leave. To come up for argument on 12.09.2017 before D.B.

(Muhammad Amin Khan Kundi) Member

12.09.2017

Counsel for the appellant and Mr. Ziaullah, DDA for the respondents present. Respondent-department is directed to furnish the relevant seniority lists on or before the next date of hearing. Adjourned. To come up for such record and arguments on 29.11.2017 before D.B.

Member (Executive)

Member (Judicial)

29.11.2017

Appellant in person and Addl: AG alongwith Mr. Nasrullah, ADO for the respondents present. Appellant submitted an application for additional documents which are placed on file and seeks adjournment. Granted. To come up for arguments on 07.02.2018 before the D.B.

Member

Chairman

13.04.2016

Counsel for the appellant and Mr. Naeem Gul, AD alongwith Mr. Ziaullah, GP for respondents present. Learned counsel for the appellant submitted rejoinder, copy whereof handed over to learned GP. To come up for arguments on 16.8.16.

Member

16.08.2016

Mr. Ibrar, Agent to counsel for the appellant and Mr. Naeem Gul, AD(Lit) alongwith Mr. Ziaullah, GP for respondents present. Clerk to counsel for the appellant requested for adjournment as counsel for the appellant has gone to Islamabad. Case is adjourned. To come up for arguments on 02.12.2016.

èmber

02.12.2016

Counsel for the appellant and Mr. Naeem Gul, AD alongwith Additional AG for respondents present. Learned counsel for the appellant seeks adjournment. Adjournment granted. To come up for arguments on 04.04.2017 before D,B.

(MUHAMMAD AŽIM KHAN AFRIDI)

CHAIRMAN

(MUHAMMAD ALAMIR NAZIR)

07.05.2015

Appellant with counsel and Addl: A.G for respondents present. Written reply not submitted. Requested for further time to submit written reply. To come up for written reply on 24.6.2015 before S.B.

MEMBER

24.06.2015

Appellant with counsel and Addl: A.G for respondents present. Written reply not submitted. Requested for further adjournment. To come up for written reply/comments on 2.9.2015 before S.B.

02.09.2015

Appellant in person and Mr. Naeem Gul, AD alongwith Addl: A.G for respondents present. Written reply not submitted. Requested for further adjournment. Last opportunity granted. To come up for written reply/comments on 24.11.2015 before S.B.

24.11.2015

Appellant in person and Mr. Naeem Gul, AD alongwith Assistant AG for respondents present. Written reply by respondents No. 2 and 3 submitted. The learned Assistant AG informed the Tribunal that the concerned Secretary i.e respondent No. 1 has been substituted by Secretary Higher Education and that reliance is placed on his behalf on the para-wise comments submitted by respondents No. 2 and 3 today. The appeal is assigned to D.B for rejoinder and final hearing for 13.4.2016.

Counsel for the appellant present and heard. Contends that the appellant was initially appointed as Senice dated 17.5.1987 Clerk vide order in the Govt. Polytechnic Institute for Women, Peshawar. That during those days the said Polytechnic Institute was run by Directorate of Technical Education which was later on took over by the Provincial Government on 1.7.1992. That vide Notification dated 8.3.1994 it was held that the seniority of the staff of Govt. Polytechnic Institute for Women Peshawar will be considered as a separate cadre. That despite the said directions no separate seniority list of the Govt. Polytechnic Institute for Women is prepared till date and that the appellant is placed in the joint seniority list including male staff members of the Provincial Government serving in the Technical Institution run by the Government which hạş hampered the right of the appellant consideration for promotion.

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That the appellant made representation against the said seniority list and her consideration for promotion on the strength of notification 8.3.1994 referred to above on 7.7.2014 which was not responded and hence the present appeal on 5.11.2014 after lapse of statutory period for decision of the departmental appeal.

Points urged need consideration. Admit. Subject to deposit of security and process fee, notice be issued to respondents, for 7.5.2015.

Chairman.

Appellant Deposited
Se Process Fee
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Form- A FORM OF ORDER SHEET

Court of	
Case No	1300/2014

	Case No	1300/2014						
S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate						
1 ·	. 2	. 3						
1	05.11.2014	The appeal of Mst. Behreen Bibi presented today by Mr. Muhammad Zafar Tahirkheli Advocate may be entered in the						
,		Institution register and put up to the Worthy Chairman for proper order.						
		REGISTRAR						
2		This case is entrusted to Bench \underline{J} for preliminary hearing to be put up there on $\underline{Jb} - \underline{I} - \underline{\lambda} + \underline{\lambda} $						
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BEFORE THE SERVICE TRIBUNAL, KHYBER PUKHTUNKHWA

Service Appeal No. | 300 / 2014

Behreen Bibi

VERSUS

Govt of Khyber Pakhtunkhwa etc.

INDEX

S.No	Particulars	Annexure	Pages
1	Memo of Petition	· •	1-3
2	Appointment order	"A"	4
3	Notification dated 08-03-1994	"B"	5
4	Notification dated 17-05-2003	"C"	6
5	Departmental appeal	"D"	7-9
6	Vakalatnama	<u> </u>	10

Date:- 31st Oct. 2014

(Muhammad Zafar Tahirkheli)
Advocate,
High Cour Peshawar

BEFORE THE SERVICE TRIBUNAL, KHYBER PUKHTUNKHWA PESHAWAR

Service Appeal No. 1360 /2014

Behreen Bibi, Senior Clerk, Government Polytechnic Institute (Women) Arbab Road, Jamrud Road Peshawar.

.....Appellant

VERSUS

- 1. Government of Khyber Pukhtoonkhwa through Secretary Industry, Commerce, Labour, Technical Education and Manpower Training Department, Government of Khyber Pukhtoonkhwa.
- 2. Secretary Finance Department Government of Khyber Pukhtoonkhwa, Peshawar.
- 3. Director General, Technical Education and Manpower Training Department, Khyber Pukhtoonkhwa Benevolent Fund Building, Peshawar Cantt.

.....Respondents

SERVICE APPEAL U/S 4 OF NWFP SERVICE TRIBUNAL ACT, 1974, FOR THE GRANT OF SENIORITY FROM THE DATE OF JOINING OF SERVICE AND DIRECTING THE RESPONDENTS TO MAINTAIN SEPARATE SENIORITY LIST FOR FEMALE STAFF.

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PRAYER:

Allowing the appeal by granting;

- (a) The seniority to the appellant w.e.f the date of joining her service on 17-05-1987 with all the benefits of service due, and
- (b) Directing the respondent department to maintain separate seniority list for the female staff of Women Polytechnic Institutes, as separate cadre.

RESPECTFULLY SHEWETH

1. Being qualified and eligible, the appellant was selected and appointed as Junior Clerk (BPS-07) in Polytechnic Institute for Women, Peshawar on 17-05-1987. At the relevant time Federal Ministry (W) Division funded the institute along with 5 other women vocational institutes under the administrative control of Directorate of Technical Education of the then, NWFP Province. (Copy annexed hereto marked "A")

___**__**

- 2. That on 1st July 1992, the above mentioned institutes were taken over by the provincial government. That the appellant's name was arbitrarily included in the joint seniority list of Junior Clerks (Male), by the Directorate in violation of the terms of provincialization of services of Women Division institutions.
- 3. That all the members of teaching staff were granted their seniority due and their services prior to 1992 was counted towards their seniority. The appellant was however omitted and was not given the benefit.

- 4. That a notification No. SO(TE)/20-10/84 dated 08-03-1994 was issued whereby it was categorically mentioned that, "for the purpose of integration of seniority of the former employees of Government Vocational Institutes Women Divisions shall be fixed viz-a-viz the provincial government employees from the date of continuous appointment, substantive or otherwise, while maintaining separate seniority list for female cadre staff". (Copy annexed hereto marked "B")
- 5. The appellant is now serving as Senior Clerk and has been serving the department honestly and diligently, with no prospect of any chance to be promoted to the post of Assistant.
- 6. That it is also necessary to mention that instead of considering the Female as a separate cadre from male cadre, the Directorate has been making promotions from the Male cadre on the vacant posts created in the in Women Polytechnic Institutes.
- 7. That the service of the appellant w.e.f 17-05-1987, have already been counted towards her pension benefits vide notification dated 17-05-2003, whereby entitling her to the seniority w.e.f date of her initial appointment. (Copy annexed hereto **marked "C"**)
- The appellant submitted a representation / appeal to this effect dated 07-07-2014, which was not decided till the expiry of the statutory period of limitation. (Copy annexed hereto **marked "D"**)

Feeling aggrieved and finding no other remedy, the appellant has been constrained to approach the Hon'ble Service Tribunal for the redress of her grievance, inter-alia, for the following,

Grounds

- (a) The respondent No. 03 has acted in most arbitrary manner, while consistently ignoring the genuine case and demand of the appellant in accordance with the rules regulating her service.
- (b) That the respondents has also ignored the guidelines provided by the Government vide notification dated 08-03-1994 (Annex "B"), whereby it was mentioned that, "for the purpose of integration of seniority of the former employees of Government Vocational Institutes Women Divisions shall be fixed viz-a-viz the provincial government employees from the date of continuous appointment, substantive or otherwise to a particular post / grade, as per rules and precedents. However, the seniority of the staff of Government Polytechnic Institute for Women will be considered as separate cadre"
- (c) That it is well established principle of law and the superior courts are of consistent opinion that the seniority would reckoned from the date of initial regular appointment to a post in a particular grade, which in the case of the appellant is 17-05-1987. She is lawfully entitled for the benefit due in accordance with the law and rules regulating the service.
- (d) That at time of provincialization of the Women Polytechnic Institutes, a clear guideline was provided that a the female staff would be treated as separate cadre but it was not enforced in its true letter and spirit and has thus denied the appellant of her valuable right to be further promoted on the next higher posts created in the women institutes from time to time.
- (e) That the service of the appellant w.e.f 17-05-1987, have already been counted towards her pension benefits vide notification dated 17-05-2003 (Annex "C), whereby entitling her to the seniority w.e.f date of her initial appointment.

That ironically the appellant was not only denied her due right of seniority w.e.f her initial appointment and then further promotion to next higher scale, but she was illegally and unlawfully placed in the joint seniority list of the cadre of male staff whereby denying her legitimate rights.

- (f) The appellant has been subjected to arbitrary treatment and has been left in larch without affording her appropriate remedy. The impugned omission is thus illegal, unlawful, collusive, against the principles of equity, law, justice and propriety, subject to correction by this Hon'ble tribunal.
- Any design harmful to the Appellant's service interest cannot be imposed arbitrarily, in violation of the Appellant's vested rights of service. The Appellant did deserve to be treated equitably fairly and in a just manner without losing the benefits of her about 27 years sincere service.
- (h) Appellant seeks permission to take several other grounds at the time of arguments.

In view of the above, it is requested that by accepting this appeal, the appellant may kindly be granted seniority w.e.f the date of her initial appointment i.e 17-05-1987, and the respondent department may be directed to maintain separate seniority list for the Female treating it a separate Cadre of the Women Institutes, with all the benefits of service due.

Any other relief deemed appropriate may also be granted.

BahreenBibi

Appellant

Through,

Peshawar, dated 31st Oct, 2014

(Muhammad Zafar Tahirkheli) Advocate High Court, Peshawar

(Ansar Ullah Khan)

Advocate High Court, Peshawar

DIRECTORATE OF TECHNICAL EDUCATION,

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DATED PESH: THE, 8-3-1994.

No.S.O(TE)/20-10/84. On the provincialization of services of the staff of Women Division Institutions, the Provincial Covernment are pleased to lay down the following terms & conditions of service for all the employees appointed by Federal Covernment on or before 1.7.1992 in various institutions of Technical Education under Women Division in the province and whose services have been transferred to Govt. of NWFP with effect from 1.7.1992:-

- 1) For purpose of integration, the seniority of the former employees of the Covt. Vocational Institutes Women Division shall be fixed vis-a-vis the Provincial Government's Employees with reference to the date of continuous appointment, substantive or otherwise, to a particular post/gradu, as per rules and precedents. However, the seniority of the staff of Government Polytechnic Institute for Women, Peshawar will be considered as a separate cadre.
- 2) They shall be eligible for pension with effect from the date of their absorption in the Provincial Government Cadre/Service.
- 3) All other terms and conditions of service which are applicable to Provincial Government caployees shall be applicable to the former employees of the Women Division Institutions who are absorbed in the Provincial Government Cadre/Service from the date of their obsorption i.e. 1-7-1992
- Provincial Covernment cadre/service shall be fixed in the prescribed pay scale at the stage equal, or if there be no such stage, at the next above stage.
- This issue with the concurrence of Services and General Admn: Department and the Finance Department.

SECRETARY TO GOVT. OF NWFP, EDUCATION DEPARTMENT, PESH:

Endst. Even No. & Date.

Copy forwarded for information and n/action to:-

- 1. The Accountant General, NWFP, Peshawar.
- 2. The Director Technical Education, NWFP, Peshewar.
- 3. The Section Officer(Regulation-I) Govt. of NWFP, SEGAD, w/r to his letter No.SORI(S&GAD)1-160/93, dated 12.7.1998.

Afforded Minage

Sd/-MUHAMMAD TLYAS TORU) SECTION OFFICER(TE)

OFFICE OF THE ACCOUNTANT GENERAL, PAKISTAN RVENUES, G-8/4,

No.PN-11/0C/2002-03//7(-/)

Dated 17/5/2003.

The Accountant General. North West Frontier Province, Peshawar.

ISLAMABAD.

Subject:-

PROPORTIONATE SHARE OF PENSIONERY CHARGES IN RESPECT OF MRS.BEHREEN BIBL

Reference letter No. F-I/NW/(ii)/3-89/P-11 dated 28th April, 2003 and of even No. dated 13th May, 2003 issued by the Ministry of Women Development Social Welfare and Special Education, State Life Building No V. Blue Area, Islamabad on the subject matter.

The debit on account of proportionate share of Pensionery charges for the period from 19-05-1987 to 30-06-1992 during which the above named official remained in Government of Pakistan. Ministry of Women Development. Islamahad at Government Polytechnic Institute for Women, Peshawar will be accepted as and when against this office.

Endst:No.PN-11/DC/2002-03/

Copy forwarded for information to:-

1. The Director General(P), Government of Pakistan, Ministry of Women Development. Social Welfare and Special Education, State Life Building No. V. Islamabad with reference to his letters quoted above.

2. The Director of Technical Education & Manpower Training, NWFP, Peshawar.

ACCOUNTS OFFICE MPENSION-II).

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OFFICE OF THE PRINCIPAL GOVERNMENT POLYTECHNIC INSTITUTE FOR WOMEN PESHAWAR

No. GPI (W)/Pesh//5441

To

The Director General, Technical Education & Manpower Trg., Khyber Pakhtun Khwa, Peshawar.

Subject: APEAL FOR JUSTICE.

Sir,

Enclosed please find herewith * self explanatory/appeal of Mrs.Behreen Bibi Senior Clerk of this Institute for further necessary action.

> (MRS.NIZAKAT BEGUM) PRINCIPAL

Diney. Ho. Dre. 4198 W. D-XO- 4198 DH- 7-7-14

Behreen



The Director General,

Technical Education & Manpower Trg;

Khyber Pukhtoonkhwa Peshawar.

Through:

PROPER CHANNEL.

Subject:

APPEAL FOR JUSTICE

Sir,

Kindly refer to my appeals vide letter No.GPI(W)Pesh/ /PF/859, dated: 17/7/2004, No.GPI(W)Pesh/PF/JC/263, dated: 10/10/2006, No.GPI(W)Pesh/Pf/763, dt: 03-11-2007, No.GPI(W)Pesh/PF/1169, dated: 12/6/2008, No, GPI(W)Pesh/PF/2563, dt: 31/7/2009, No. GPI(W)Pesh/PF/ 3364, dt: 30/5/2011 and No.GPI(W)Pesh/PF/8387, dt: 15/9/2012, on the subject noted above.

I once again submit the followings for your kind consideration.

- I was appointed as Jr. Clerk in Govt. Polytechnic Institute for women, Peshawar in 1987. At that time Federal Ministry (W) Division funded the Institute along with five other women vocational Institutés under the administrative control of Directorate Technical Education, NWFP.
- On 1st July 1992, the above mentioned institutes were taken over by the Provincial Govt. but before July 1992, the services of three Teachers of Vocational Institute in BPS-III were considered towards Promotion and they were promoted in BPS-17 as Principals of three different women vocational (Appointments and promotion copies attached).
- Likewise the services of teaching staff of women Polytechnic 3-Institute were also considered towards promotion and different teaching staff soon after 1992 promoted in higher grades considering, their services before 1992 for promotion (Copies of appointment and promotion of Mrs. Earida Nasreen, Junior. Instructor attached).



I was Jr. Clerk having no proper reach to the Directorate for presenting my case to the high ups was listed in the joint seniority list of Jr. Clerk male side in 1992 when the institute was taken over by the Provincial Government and was made Junior to all those who joined the service even after five years later than me and now even after twenty seven years service. I am Senior Clerk only which in not but discrimination and cruelty to the women folk.

Further more, the Govt. has already considered and contributed the services of all these staff before 1992 towards pension including me. And if the services before 1992 are considered towards pension then it should also be considered towards seniority as well and promotion in my case as well.

It is also to point out that in the Notification No.SO(TE)/20-10/84, dated 08-3-1994, (copy attached) it was clearly pointed out that the seniority of the staff of Govt.Polytechnic Institute for women, would be considered as a separate cadre from the male cadre and Should have also be promoted on the vacant post of senior clerk, Assistant with the passage of time sanctioned for Govt. Polytechnic Institute rather to promote clerks of male cadre on these posts.

In the light of the above mentioned facts. I once again appeal your honor for justice to me and consider my service towards seniority not from the date of taking over the institute by the Provincial Govt. but by the date of joining the service as had been done in case of Vocational Teachers and teachers of women, Polytechnic Institute (w) Peshawar.

THE STATE

Yours Sincerely

(MRS. BEHREEN BIBI)

Senior Clerk GPI(W)Peshawar.

of 2016/ Petitioner Plaintiff Applicant Appellant Complainant Decree-Holder ERSUS Respondent Defendant Opponent Accused Judgment-Debtor 1/W/e the above noted do hereby appointed and constitute, Muhammad Zafaf Tahirkheli & Ansar Ullah Khan, Advocates High Court, to appear, plead, act, compromise, withdraw or refer to arbitration for me / us as my / our counsels / advocates in the above noted matter, without any liability for his default and with the authority to engage any other Advocate / Counsel at my./ our cost. * The Client / Litigant will ensure his presence before the Court on each and every date of hearing and the counsel would not be responsible if the case is proceeded ex-parte or is dismissed in default of appearance. All cost awarded in favour shall be the right of Counsel or his nominee, and if awarded against shall be payable by me/us. I / We authorize the said Advocates to withdraw and receive on my / our behalf all sums and amounts payable or deposited on my / our account in the above noted matter. BahreenBibi 31-10-14 Dated Attested & Accepted (Advocates) Office ATIQ LAW ASSOCIATES, 87, Al-Falah Street, Besides State Life Building, Peshawar Cantt. Phone: 091-5279529 E-mail: zafartk.advocate@gmail.com

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Appeal No. 1300/2014

Behreen Bibi, Senior Clerk, Government Polytechnic Institute (Women), Peshawar.

.....Appellant.

<u>V E R S U S</u>

- 1. The Secretary Industries, Technical Education, Government of Khyber Pakhtunkhwa, Peshawar.
- The Secretary Finance Department, Government of Khyber Pakhtunkhwa, Peshawar.
- 3. The Director General Commerce Education & Management Sciences, Khyber Pakhtunkhwa, Peshawar.

.....Respondents

Parawise comments on behalf of Respondent No 2 and 3.

PRELIMINARY OBJECTIONS:

- A- That the appellant has no cause of action
- B- That the appeal is badly time barred.
- C- That the appellant has got no locus standi.
- D- That the appeal is incompetent in its present form.
- E- The appellant has not come to the Honourable Tribunal with clean hands.
- F- That the appeal is bad in its present form for non-joinder and mis-joinder of the necessary parties.

Respectfully Sheweth:

- 1. It is incorrect. The appellant was appointed as Junior Clerk BPS-05 not BPS-07 on stop gap arrangement on temporary basis in Government Polytechnic Institute (W) Peshawar funded by the Federal Ministry of Women Division Islamabad on 17-05-1987.
- 2. It is correct with further clarification that on 1.7.1992 the subject institute was taken over by the Provincial Government and the service of the appellant was transferred to provincial government on 1-7-1992. Prior to this she was serving on stop gap arrangement basis in the project, funded by the Federal Ministry of Women Division, Islamabad. It is further added that her name was rightly included in the seniority list of Junior Clerks as there is joint seniority for both male and female staff of management cadre in the department. Separate seniority is only for teaching cadre staff and the appellant belongs to management cadre.

- 1
- 3. It is incorrect. The para needs clarification on the part of the appellant.
- 4. It is incorrect. The appellant was initially appointed on stop gap arrangement in Government Polytechnic Institute (W) Peshawar while the notification No. SO (TE)/20-10/84 dated 08-03-1994 are for those employees who were appointed by initial recruitment on regular basis. Furthermore Separate seniority is only for teaching cadre staff while the appellant belongs to management cadre.
- 5. It is correct with further clarification that the appellant was promoted from post of Junior Clerk BPS-11 to Senior Clerk BPS-14. The appellant is at serial No.21 of the seniority list of Senior Clerks and will be promoted at her own turn of promotion after promotion of her senior colleagues. It is pertinent to mention that she has never objected/challenged seniority list issued in past from time to time.
- 6. It is incorrect in view of reply given in para2 above.
- 7. It is correct with further clarification that the seniority is always determined and takes effect from the date of regular appointment while the appellant was initially appointed on stop-gap arrangement.
- 8. Needs no comments.

GROUNDS.

- a- Incorrect. Respondent No.3 has treated the appellant in accordance with Law, Rules and Policy of the Government.
- b) Incorrect in view of the aforementioned comprehensive reply.
- (incorrect. The appellant was initially appointed on stop gap arrangement in Government Polytechnic Institute (W) Peshawar funded by the Federal Ministry of Women Division Islamabad on 17-05-1987 and the service of the appellant was transferred provincial government on 1-7-1992.
- d- Incorrect. Separate seniority is only for teaching cadre staff and the appellant belongs to management cadre. Furthermore the appellant was promoted from the post of Junior Clerk BPS-11 to Senior Clerk BPS-14. The appellant is at serial No.21 of the seniority list

of Senior Clerks and will be promoted at her own turn of promotion after promotion of her senior colleagues.

- e- It is correct with further clarification that the seniority is always determined and takes effect from the date of regular appointment while the appellant was initially appointed on stop-gap arrangement on temporary basis. It is further added that she was promoted as Senior Clerk on the basis of joint seniority list and she have never objected on her seniority issued time to time from 1992 till today.
- f- Incorrect in view of the aforementioned comprehensive reply given in pare-2, 4 and 5.
- g- Incorrect. The appellant has been treated as per law and rules on the subject.
- h- That the respondents also seek permission to raise additional grounds at the time of arguments.

In view of the above explained position, it is requested that the instant appeal for having no force of law and facts may be dismissed with cost.

RESPONDENT NO. 2

The Secretary Finance Department, Government of Khyber Pakhtunkhwa, Peshawar.

RESPONDENT NO. 3) _

The Director General Commerce Education and Management Sciences, Khyber Pakhtunkhwa, Peshawar.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Appeal No. 1300/2014
Behreen Bibi, Senior Clerk, Government Polytechnic Institute (Women),
Peshawar.
Appellant

VERSUS

- 1- The Secretary Industries, Technical Education, Government of Khyber Pakhtunkhwa, Peshawar.
- 2- The Secretary Finance Department, Government of Khyber Pakhtunkhwa, Peshawar.
- 3- The Director General Commerce Education & Management Sciences, Khyber Pakhtunkhwa, Peshawar.

.....Respondents

AFFIDAVIT

We, the respondents in the above titled appeal do hereby solemnly affirm and confirm that the contents of the connected reply is true and correct to the best of our knowledge and belief and nothing has been concealed from this august court.

RESPONDENT NO. 2)

The Secretary Finance Department,
Government of Khyber Pakhtunkhwa,
Peshawar.

RESPONDENT NO. 3)

The Director General Commerce Education and Management Sciences, Khyber Pakhtunkhwa, Peshawar. SO (Litigation) Finance Debtt

BEFORE THE SERVICE TRIBUNAL, KHYBER PUKHTUNKHWA PESHAWAR

Service Appeal No. <u>1300</u> / 2014

Behreen Bibi

Versus

Govt. of KP etc

APPELLANT'S REJOINDER,

========

RESPECTFULLY SHEWETH:

REPLY TO PRELIMINARY OBJECTIONS:

1. All the preliminary objections detailed in para a to f of Respondents No. 2 & 3 are a gross misstatement and irrelevant assertion designed to mislead. These are factually incorrect and legally untenable and as such are to be ignored.

REJOINDER ON FACTS:

- Para 1 of the appeal is correct and that of reply is incorrect. The appellant was appointed as Junior Clerk vide order dated 17-05-1987 on a vacant post. That after the Provincialization of services vide order dated 08-03-1994, it was held that seniority of staff of Government Polytechnic Institute for Women Peshawar will be considered as a separate cadre (Annex B, p-5), which was not done by the department arbitrarily.
- 2. Para 2 has been admitted correct by the respondents.
- 3. Para 3 of the appeal is correct and that of reply is incorrect. The allegation mentioned in para 3 of the appeal has not been addressed and replied properly.
- 4. Para 4 of the appeal is correct and that of reply is incorrect.
- 5. Para 5 of the appeal is correct and that of reply is incorrect.
- 6. Para 6 of the appeal is correct and that of reply is incorrect, the Directorate has been making illegal promotions from the Male cadre on the vacant posts created in the in Women Polytechnic Institutes.
- 7. Admitted correct by the respondents.
- 8. Needs no reply.

REPLY TO THE GROUNDS:

All the grounds taken in para "a" to "h" of the appeal are correct and that of the reply are incorrect being mere assertions.

In view of the above, the appellant's appeal may kindly be accepted as prayed for.

Bibi Bahreeu Appellant,

Through,

Peshawar, dated 8th April, 2016

(Muhammad Zafar Tahirkheli) Advocate High Court, Peshawar

<u>Affidavit</u>

I, the appellant, do hereby state on Oath that the contents of the above rejoinder are true and correct to the best of my knowledge and belief, and nothing has been kept concealed from this Hon'ble Tribunal.

ATTESTED BO

BOUXEE BOUXEE DEPONENT

BEFORE THE SERVICE TRIBUNAL, KHYBER PUKHTUNKHWA PESHAWAR

Service Appeal No. 1300/ 2014

Behreen Bibi

VERSUS

Govt of Khyber Pakhtunkhwa etc.

APPLICATION FOR SUBMISSION OF ADDITIONAL DOCUMENTS

Respectfully Sheweth,

- 1. The above mentioned service appeal is pending before the Hon'ble Tribunal is fixed for today i.e 29-11-2017.
- 2. That the Hon'ble Tribunal had directed the appellant to submit the relevant documents regarding her service. The certified copy of the **Service Book** is thus required to be placed on record for the just conclusion of the case on merits.

In view of the above, it is requested that by accepting this application the service book of the appellant may be placed on record for the disposal of the case on merit.

Appellant

Peshawar Dated: 29-11-2017

through

Affidavit

I the appellant/ applicant do hereby state on oath that the contents of the above application are true and correct and nothing has been kept concealed from this Hon'ble Tribunal.

Deponent

original

SERVICE BOOK

Positian No 2026809

Bahreen Belei

Junior clerk.

92-32-6354

GS&PD, NWFP, 1595 P-B, 50,000 B.

Price Rs. 4.50

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Attested/

PRINCIPAL GOVERNOUS ENSTITUTE

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FOR HOMES PESHAWAR.

Allested

Govt. College of Commerce (Women) Arbab Road (Women) Arbab Road SIGNATURE. Bh

HAME: Rabreen BIR.

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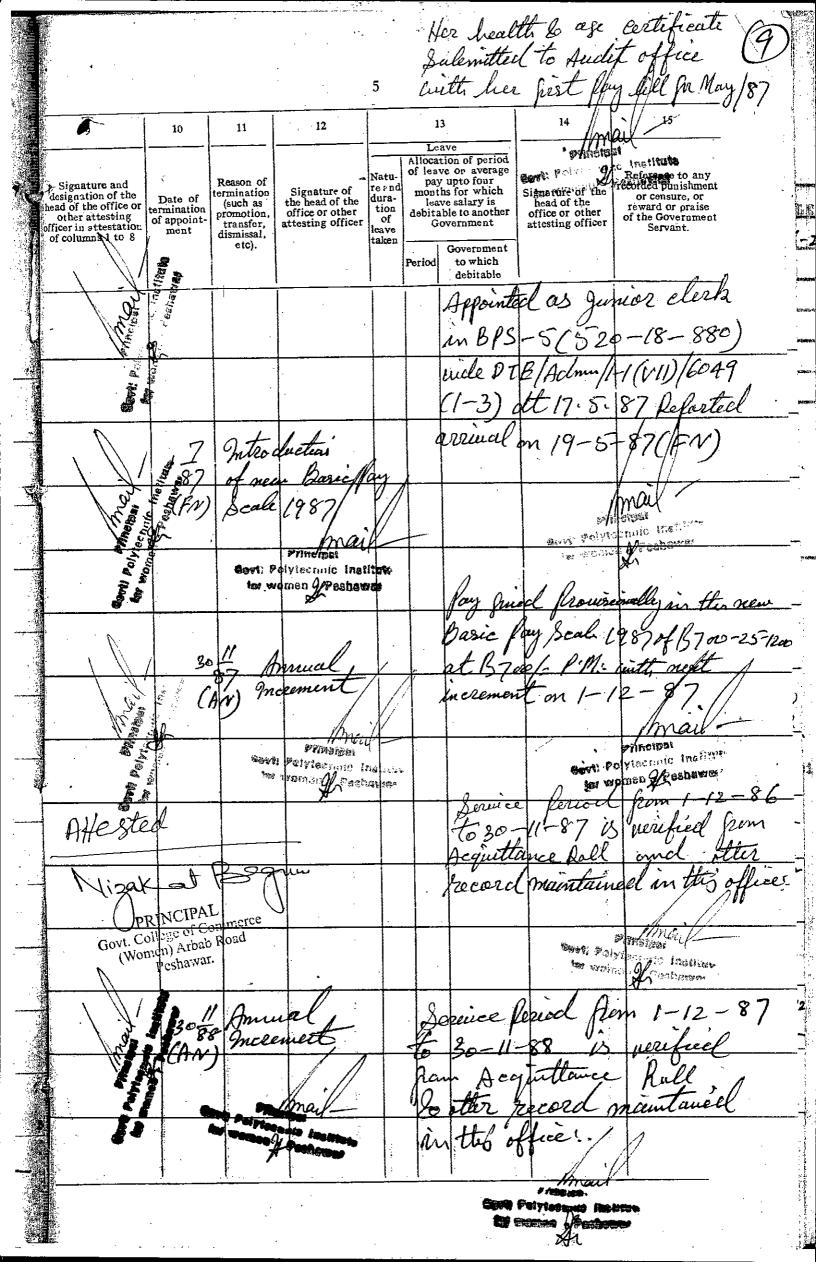
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Govt. College of Commerce (Women) Arbab Road Peshawar.

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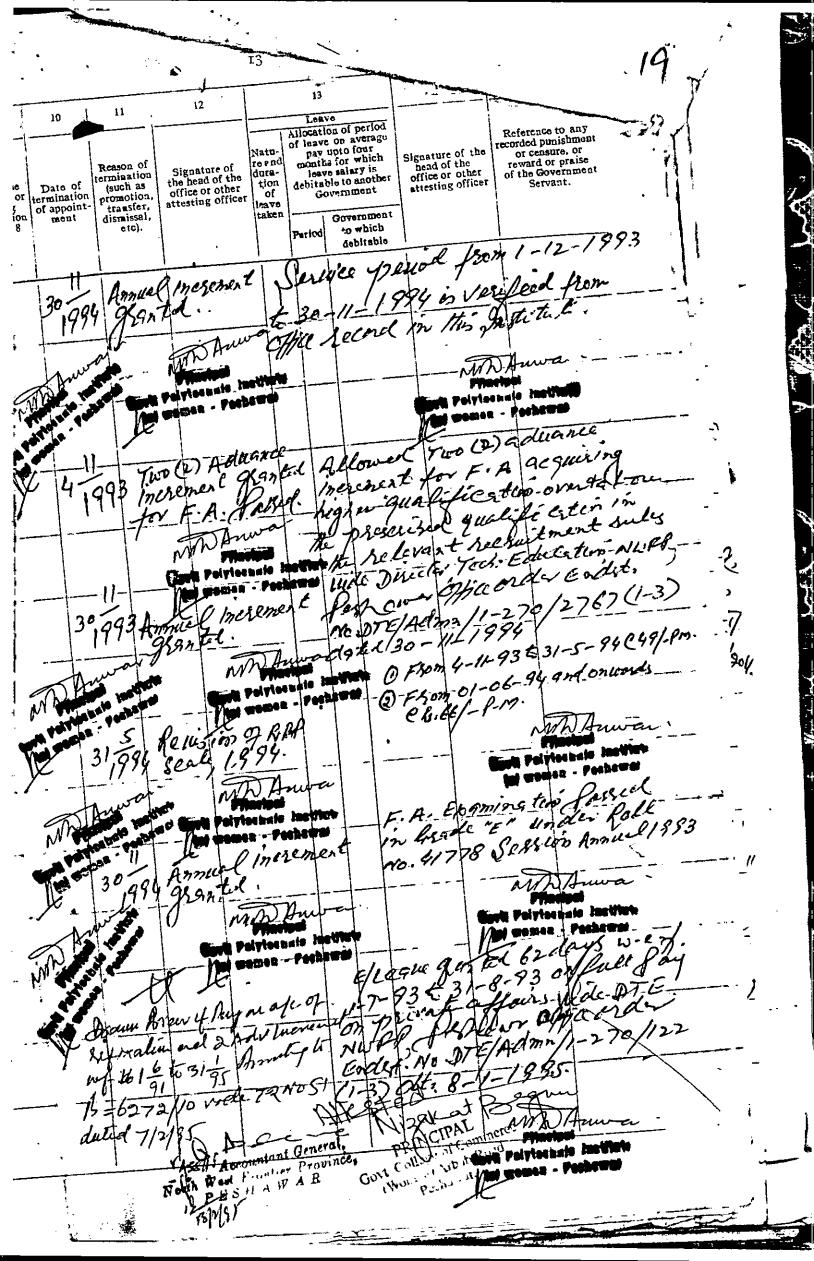
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GOVERNMENT OF KHYBER PAKHTUNKHWA FINANCE DEPARTMENT (REGULATION WING)

Dated Peshawar, the 20-05-2014

NOTIFICATION

NO.FD/SO(FR)10-22/2014 The competent authority has been pleased to accord sanction to the upgradation of pay scales of the following poets, wherever exist, in all the Departments / Offices (except Civil Secretariat) of the Government of Khyber Pakhtunkhwa with immediate effect:

S. No.	Nomenclature of the post	Misting Scale	Upgraded Scale
	Superintendent	BS-16	BS-17
2	Assistant	BS-14	BS-16
;	Senior Clerk	BS-09	BS-14
.4	Junior Clerk	BS-07	BS-11

The pay of the existing incumbents of the posts shall be fixed in higher pay scales at a stage next above the pay in the lower pry scale.

All the concerned Departments will amend their respective service rules to the same effect in the prescribed manner.

SECRETARY TO GOVE OF KHYBER PAKHTUNKHWA FINANCE DEPARTMENT

Endst No. & Date even.

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

- PS to Additional Chief Secretary, FATA.
- All Administrative Secretaries Government of Khyber Pakhtunkhwa.
- Senior Member, Board of Revenue, Khyber Fikhunkhwa Peshawar.
- Accountant General, Khyber Pakhtunkhwa, Peshawar
- Secretary to Governor, Khyber Pakhtunkhwa, Feshawai
- Principal Secretary to Chief Minister, Khyoer Pakhtunkhwa.
- Secretary Provincial Assembly, Khyber Pakhtunkhwa
- All Heads of Attached Departments in Khybe Pakhtunkhwa.
- Registrar, Peshawar High Court, Peshawar,
- 10. All Deputy Commissioners, Political Agente. District & Sessions Judges / Executive District Officers in Khyber Pakhtunkhwa.
- 11. Chairman, Khyber Pakhrunkhwa, Public Service Commission, Peshawar.
- 12. Registrar, Service Tribunal Khyber Pakhtunkhwa.
- 13. All the Autonomous and Semi Autonomous Bodies in Khyber Pakhtunkhwa.
- 14. Secretary to Govt; of Punjab, Sindh and Baluchistan, Finance Department, Lahore, Karachi and Quetta.
- 15. The District Comptroller of Accounts, Peshawar, Mardan, Kohat, Bannu, Abbottabad, Swat and D.I. Khan. 16. The Senior District Accounts Officer Nowshera, Swabi; Charsadda, Haripur, Mansehra and Dir Lower.
- 17. The Treasury Officer, Peshawar,
- 18. All District/Agency Accounts Officers in Khyber Pakhtunkhwa / FATA.
- 19. PSO to Senior Minister for Finance, Khyber Pakhtankhwa,
- 20. PSO to Chief Secretary, Khyber Pakhtunkhwa.
- 21. Director Local Fund Audit, Khyber Pakhturkhwa Peshawar.
- 22. PS to Finance Secretary.
- 23. PAs to All Additional Secretaries, Deputy Secretaries in Finance Department,
- All Section Officers/Budget Officers in Finance Department.
 Abbas Khan President of Khyher Pekhunkhwa Civil Secretariat Superintendent, Assistant, Clerks Association with reference to his application 40. PR/KPS/SACA/2-1/2013 dated 8-01-2014 ...

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(SHAUKAT ULLAH) SECTION OFFICER (FR)

Govt. College of Commerce (Women) Arbab Road Peshawar.

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OFFICE OF THE ACCOUNTANT GENERAL, PAKISTAN RVENUES, G-8/4, ISLAMABAD.

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	1. The Direct	or General(P). Government of	Pakistar	n, Ministry of Wome	en Development
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	reference to	his letters quoted above.			
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Govt. College of Commerce

(Women) Arbab Road

Peshawar.

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DIRECTORATE GENERAL COMMERCE EDUCATION & MANAGEMENT SCIENCES, KHYBER PAKHTUNKHWA, RANO GARHI,CHAMKANIMOR, G.T. ROAD; PESHAWAR.

OFFICE ORDER:-

NO.DGCE&MS/Admn/1-1(xvi)/ Consequent upon the commendation of the Departmental Promotion Committee, the following Senior Clerks(BPS-14) of this Department are hereby promoted to the Posts of Assistant/ Head Clerks (BPS-16) on

regular basis with immediate effect:-

S.#	Name of Incumbents.		S.#	S.# Name of Incumbents.	
01.	Mr. Muhammad Usman.	28	08.	Mr. Muhammad Naeem,	
02	Mr. Maula Dad.	` "	09.	Mr. Alta fur Rehman,	
03.	Mr. Gohar Shah,		10.	Mr. Muhammad Aslam.	
04.	Mr. Nisar Ahmad,		11.	Mr. Saleh Jan,	
05.	Mr. Yaqoob Khan,		12	Mr. Muhammad Nisar Khan,	
06.	Mrs.Behreen Bbi,		13.	Mr. Fazli Rahim,	
07.	Mr Fazli Subhan,				

On their promotion, they are posted against the post and stations as noted against each in the public interest:-

-	s.#	Name of Incumbent	Posted as
	Ø1.,	Mr. Muhammad Usman,	Assistant B-16, Government College of
M	المهمر ا	Senior Clerk, B-14,	Management Sciences, Bannu against
	t _C	GCMS, Bannu.	the vacant post.
ļ	02.	Mr. Maula Dad.	Assistant B-16, Government College of
ا محمد ا	~	Senior Clerk B-14,	Management Sciences, Kohat against
500		GCMS, Haripur.	the vacant post.
Sevies Sevies	03-	Mr. Gohar Shah,	Assistant B-16, Government College of
Vollo 3	ν,	Senior Clerk B-14,	Commerce No2, Nowshera against the
Ser		GCMS, Jalozai, Nowshera	vacant post.
	04	Mr. Nisar Ahmad,	Assistant B-16, Government College of
No		Senior Clerk B-14,	Commerce No.2, Peshawar against the
50		DGCE&MS	vacant post.
	05	Mr Yaqoob Khan,	Assistant B-16; Government College of
Si		Senior Clerk B-14,	Management Sciences, Charsadda
/	 	DGCE&MS	against the vacant post.
	06	Mrs Behreen Bibi,	Assistant B-16, Government College of
	W.	Senior Clerk B-14,	Commerce for Women, Rani (Dir Lower)
	ļ. ₋	GCC(W), Arbab Road, Peshawar	against the vacant posts
	07	Mr. Fazli Subhan,	Assistant B-16, Government College of
		Senior Clerk B-14,	Commerce for Women, Mardan against
		GCC No.2, Mardan	the vacant post.
	80	Mr. Muhammad Naeem,	Assistant B-16. Government College of
		Senior Clerk B-14,	Commerce No.2, DI Khan against the
		GCMS, DI Khan	vacant post.
	09	Mr. Alta fur Rehman,	Assistant B-16, Government College of
		Senior Clerk B-14;	Management Sciences, Haripur, against
		GCC(W), Abbottabad.	the vacant post.
	10	Mr. Muhammad Aslam,	Assistant B-16, Government College of
	1	Senior Clerk B-14	Management Sciences, Mansehra
	1	GCMS, Mansehra.	against the vacant post



-2-

11	Mr. Saleh Jan Senior Clerk B-14 DGCE&MS	Assistant B-16, DGCE&MS against the vacant post.
	Mr. Muhammad Nisar Khan, Senior Clerk B-14, GCMS, Bannu.	Assistant B-16, Government College of Management Sciences, Bannu against
13	Mr. Fazli Rahim, Senior Clerk B-14, GCMS, Timergara(Dir Lower)	the vacant post: Assistant B-16, Government College of Management, Sciences, Timergara (Dir Lower) against the vacant post.
	**	

Promotion of the officials is also subject of the following terms and conditions:-

- They will be on probation for a period of one year in terms of Section-6 (2) of the Khyber Pakhtunkhwa, Civil Servants Act, 1973 read with Rule -15(I) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989.
- The inter-se seniority position of the promoted officials shall remain intact as they were holding in the lower cadre of the seniority list.

(PROF; MUHAMMAD NADEEM) DIRECTOR GENERAL,

Endst No.DGCE&MS/Admn/1-1(xvi)/35/5 (1-26) Dated: 06. / 97

Copy forwarded for information and necessary action to:-

- The Accountant General, Khyber Pakhtunkhwa, Peshawar.
- The Section Officer(Commerce) Higher Education Department, Kkhyber Pakhtunkhwa, Peshawar,
- The District Accounts Officers, Abbottabad, Bannu, D.I. Khan, Hanpur, Dir Lower, Kohat, Mansehra, Mardan, Nowshera and Charsadda.
- The Principals, Government College of Management Sciences, Abbottabad, Bannu, Haripur, Timergara, Kohat, Mansehra, Nowshera & Charsadda
- The Pincipals, Government Colleges of Commerce No.2, Reshawar, Mardan,
- The Principals, Government Colleges of Commerce for Women, Arbab Road, Peshawar, Mardan, Abbottabad & Rani(Dir Lower).
- The Officials concerned.
- 8. PA to DGCE&MS

Before the KPK, Service Tribunal Pesh: Service Appeal No. 1300/2014
13ehreen Bibi
Versus Education Application for Early Hearing in the

About Mentioned Appeal. Duat the above mentioned appeal mas fixed for arguments on 13.4.2016 That my cousel was Present but he shortinge of Time my case was adjourned to. und I bolong to Poor Family of Disti fish: and Suffering Financially due to removal from Gernice. it is therefore most humbly prayed that on acceptance of this application my Service A. No. 1300/16 may very graciously be fixed as early as Passible. B) about owners: Henrs obediently Baho Centribi Rodr. Pagi mis. Behreen Bitsi