

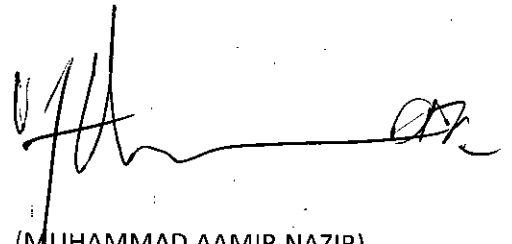
27.01.2017

None present for the appellant. Mr. Ziaullah, GP for respondents present. The court time is about to over but non-appeared on behalf of the appellant nor the appellant was present in person despite issuance of the notice to appellant and his counsel, therefore, the instant appeal is hereby dismissed in default. File be consigned to the record room.

ANNOUNCED:
27.01.2017



(AHMAD HASSAN)
MEMBER



(MUHAMMAD AAMIR NAZIR)
MEMBER

26.1.2016

Appellant in person, M/S Khurshid Khan, SO and Hameed-ur-Rehman, AD (lit.) alongwith Addl: A.G for respondents present. Parawise comments submitted. The appeal is assigned to D.B for rejoinder and final hearing for 9.5.2016.


Chairman

09.05.2016

None for the appellant present. Asstt: AG for respondents present. Notices be issued to the appellant/counsel for the appellant. To come up for rejoinder and arguments on 22.09.2016.


Member

22.09.2016

No one is present on behalf of the appellant. Mr. Muhammad Jan, GP for respondents present. Notices be issued to the appellant and his counsel. To come up for rejoinder and arguments on 27-1-17.


Member


Member

02.07.2015

Appellant Deposited
Security & Process Fee



Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was appointed as SET in BPS-16 on 23.10.1995 and was entitled to up-gradation with effect from 1.10.2007 but vide impugned order dated 23.7.2014 he was granted up-gradation with immediate effect regarding which he preferred departmental appeal on 21.8.2014 which was not responded and hence the instant service appeal on 19.12.2014.

That the appellant is entitled to the benefits of up-gradation with effect 1.10.2007.

Point urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply for 15.10.2015 before S.B.


Chairman

57

15.10.2015

Since 15.10.2015 has been declared as public holiday on account of 1st Muharram-ul-Haram, therefore, case is adjourned to

26-1-15 for the same.


Reader

Reader Note:

21.01.2015

Since 20th January has been declared as public holiday by the provincial government, therefore, case is adjourned to 27.02.2015 for the same.


Reader

27.02.2015

None present for appellant. Notice be issued to counsel for the appellant for preliminary hearing for 09.04.2015 before S.B.


Chairman

9.04.2015

Appellant in person present. Requested for adjournment. Adjourned to 11.6.2015 for preliminary hearing.


MEMBER

11.06.2015



Appellant in person present. Counsel for the appellant is not in attendance. Adjourned for preliminary hearing to 2.7.2015 before S.B.


Chairman

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 1417/2014

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	19.12.2014	<p>The appeal of Mr. Quresh Khan presented today by Mr. Yaqub Khan Advocate may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p> <p style="text-align: center;">This case is entrusted to Bench for preliminary hearing to be put up there on.</p> <p style="text-align: right;"> CHAIRMAN</p>

Before the K.P.K service tribunal Peshawar

Service Appeal NO 1417 /2014

Quresh Khanappellant

VERSUS

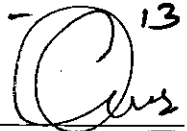
Chief Secretary etcRespondents

APPEAL

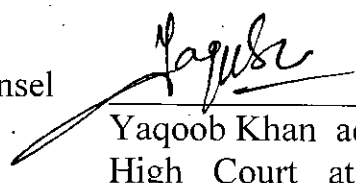
INDEX

S.No	Descriptions	Annex:	Pages	
			From	to
1	Grounds of appeal		1	3
2	Order of appointment	"A"	-	4
3	Copy of notification	"B"	5	-
4	Copy of impugned order dated 23/07/2014	"C"	6	10
5	Copy of departmental appeal	"D"	11	12

6. Wakalat Nama

Appellant, 
Quresh Khan

Trough counsel


Yaqoob Khan advocate
High Court at Distt:
courts Mardan.

Yaqui Khan
Advocate,
Distt: Courts Mardan.

Dated 17/12/2014

1

Before The K.P.K Service Tribunal Peshawar

①

Service Appeal No 1417 /2014

1458
19-12-2014

Quresh Khan S/o Dilawar Khan SET Teacher GHS Asota Swabi R/o---
Village Sheikh Jana Tehsil & Dist: SwabiAppellant

VERSUS

1. Chief Secretary KPK Peshawar
2. Secretary of (E & SE) (KPK) Peshawar
3. Director of (E & SE) KPK Peshawar..... Respondents

Appeal U/S-4 of Service Tribunal Act 1974 against the order of respondent No.1 dated 23/07/2014 against which appellant filed departmental appeal dated 21/08/2014, whereby appellant is promoted/upgraded from BPS-16 to BPS-17 with immediate effect i.e 23/07/2014 instead of 01/10/2007 as per notification of Govt dated 26/01/2008, which is illegal, against law and facts.

Sir,

Appellant humbly submits as under

1. That appellant is posted as SET teacher in GHS Asota Tehsil & District Swabi with the respondents department.
2. That appellant was appointed as a SET teacher with respondents department vide order dated 23/10/1995 on regular basis . (Copy of appointment order is attached as Annex: "A").
3. That appellant has completed his service in BPS-16 as a SET teacher on 23/10/2005 and also granted relaxation of pay on the basis of FR-22 (b) vide order dated 26/03/1996.
4. That respondents department has issued a notification dated 26/01/2008, whereby up gradation for the incumbents of the post as per detail given in the said notification appellant is entitled/allowed for up gradation of BPS-17 on completion of his 10 x years service in BPS-16 as a SET teacher vide

19/12/14

(2)


notification dated 26/01/2008. *(Copy of notification is attached as Annex: "B")*.


5. That appellant is entitled for up gradation of BPS-17 w.e.f 01/07/2007 instead of 23/07/2014 as per notification dated 26/01/2008.
6. That respondent No.2 that respondent No.2 issued notification fro up gradation/promotion of appellant from BPS-16 to BPS-17 w.e.f 23/07/2014 instead of 01/10/2007 on the basis of notification dated 26/01/2008 vide order dated 23/07/2014, which is illegal, against law , facts and order dated 26/01/2008. *(Copy of impugned order dated 23/07/2014 is attached as Annex: "C")*.
7. That appellant preferred an appeal dated 21/08/2014 but in vain. (Copy of departmental appeal is attached as Annex: "D").
8. That appellant is entitled for modification of notification of respondent NO.2 dated 23/07/2014 to the extent of date of up gradation w.e.f 01/01/2007 instead of with immediate effect ie 23/07/2014 on the following grounds:-

GROUND

- A. The order of respondent No.2 dated 23/07/2014 is illegal, against law and facts.
- B. That as per notification of respondent No.2 dated 26/01/2008 that who has completed 10 X years service in the post of SET (BPS-16) they are entitled for up gradation/promotion to the post of BPS-17.
- C. That appellant was appointed as a SET teacher (BPS-16) on 23/10/1995 and he has completed 10 X years service in the post of SET teacher (BPS-16) on 22/10/2005, so, appellant is entitled for promotion w.e.f 01/10/2007 instead of 23/07/2014.
- D. That appellant has filed various applications for up gradation/promotion of appellant w.e.f 01/10/2007.
- E. That appellant has recurring cause of action because appellant is recerving on every 1st of each month, hence appeal of appellant is within time.

It is therefore, humbly prayed that on acceptance of this appeal, order of respondent No.2 dated 23/07/2014 may please be modified to the extent of appellant to the date of 01/10/2007 instead of 23/07/2014 with all back benefit. Any other relief deemed fit may also be graciously awarded.


Appellant, 
Quresh Khan

Trough counsel 
Yaqub Khan advocate
High Court at Distt:
courts Mardan.
Yaqub Khan
Advocate,
Distt: Courts Mardaa

Dated 17/12/2014


AFFIDAVITE

I, do hereby solemnly and affirm that the contents of appeal are true and correct to the best of my knowledge and nothing has been concealed from this Hon'able court.


Deponent.

M. AKBAR NOTI ADVOCATE
High Court
Oath Commissioner
No _____ Dated 18-12-2014
Distt, Courts Mardan

OFFICE OF THE DIRECTOR SECONDARY EDUCATION, N.W.F.P., PESHAWAR.

Aux A

 4

NOTIFICATION

Consequent upon their selection by the Departmental Selection Committee the Director Secondary Education, NWFP, Peshawar has been pleased to appoint the following trained graduate candidates against SET posts at the school noted against each in BIS-14 (Rn: 559-197-5450) plus usual allowances as admissible under the rules with immediate effect subject to the existing terms and conditions.

S.NO:	Name & Address	School where posted	Remarks
1-	Quresh Khan, PTC, GPS, NO:2, Sheikh Jana.	G.S., Peshar Market (Swabi)	Against vacant post.

TERMS AND CONDITIONS

- 1- They will be governed by such rules and regulation as may be prescribed by the Govt; from time to time for the category of Govt; Servant to which they belong.
- 2- Their service will be liable to termination on one month notice from either side. In case of resignation with out notice one month pay will be forfeited in lieu thereof.
- 3- They should join the posts within one month of the issue of this Notification.
- 4- Their inter-se-seniority will be determined in accordance with the merit of Departmental Selection Committee.
- 5- Charge report should be submitted to all concerned.
- 6- They shall be on probation for a period of two years.
- 7- Their original certificates/Degrees should be checked and verified from the concerned University.
- 8- The declaration of assets should be obtained from them and placed on record.
- 9- Fresh candidates should not be handed over charge if their age is less than 18 or more than 30 (±2 years Govt; Relaxation).
- 10- No TA/DA is allowed.
- 11- They are required to produce Health and age certificate from Medical authorities concerned before taking over charge.


(SYED ABU SAEED BACHA)
 DIRECTOR

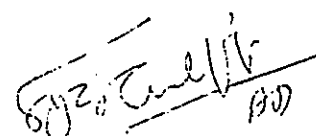
Endst: NO: 6587-91 A-14/SEP/Asstt:

Dated Pesh; the 23/10 1995.

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

- 1- Accountant General, NWFP, -Peshawar
- 2- Divl: Director of Education (P) Peshawar
- 3- District Education Officer (P) Peshawar/ Swabi, Mardan & Swabi
- 4- District Accounts Officer concerned.
- 5- Principal/Headmaster, GIS, Peshar Market (Swabi)
- 6- Officer concerned.


 HEAD MASTER
 Govt High School Asota Sharif
 (Swabi)


 DEPUTY DIRECTOR SECONDARY
 EDUCATION, NWFP, PESHAWAR.

NOOR BAD SHAH/*



GOVERNMENT OF NWFP
FINANCE DEPARTMENT

(REGULATION WING)

Dated Peshawar, the 26th January, 2008.

Annex 8
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NOTIFICATION

NO.FD/SO(FR)10-22/2007. In supercession of this Department's letter No.SO(FR)10-22(B)/2005 dated 01-10-2007 and in pursuance of the decisions of the meeting held under the Chairmanship of Secretary Establishment on 2-1-2008, the Competent Authority is pleased to allow upgradation for the incumbents of the posts as per details given below w.e.f. 1-10-2007:-

S.NO	Existing Designation and Pay Scale	Qualification	Upgraded Scale
1	Primary School Teacher (PST) (BPS-07).	FA/FSc and are trained teachers	BPS-09 (one time only)
2	Primary School Teacher (PST) with requisite experience renamed as Head Teacher/Head Mistress of Primary Schools (BPS-07).	Having 10 years service	BPS-12 (one time only)
3	CT (BPS-09).	BA/BSc and are trained teachers	BPS-15 (one time only)
4	SETs (BPS-16)	With at least ten years service. Upgradation to the post shall be made through DPC as per laid down procedure.	BPS-17
5	Qari/Qaria (BPS-07)	Hafiz Qur'an with SSC	BPS-12

SECRETARY TO GOVT. OF NWFP
FINANCE DEPARTMENT

Endst No. & Date even.

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

- 1) All the Secretaries in NWFP, Peshawar.
- 2) All the DCOs/EDOs Schools & Literacy Department, NWFP.
- 3) Accountant General, NWFP, Peshawar.
- 4) Director Schools & Literacy NWFP, Peshawar.
- 5) Director of Education FATA NWFP, Peshawar.
- 6) PSO to Chief Minister, NWFP.
- 7) PSO to Chief Secretary, NWFP.
- 8) PS to Secretary Finance Department, NWFP.
- 9) All District/Agency Accounts Officers in NWFP.

Naib Khan
(NAIB KHAN)
SECTION OFFICER (FR)

Attested
Signature



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Dated Peshawar the 23-07-2014

Auxiliary
6

ADDE

NOTIFICATION

No. SO(PE)E&SED/2-6/DPC/Meeting(29-05-2014). On the recommendations of the Departmental Promotion Committee meeting held on 29-05-2014, the Competent Authority is pleased to upgrade the following Male/Female SETs from BPS-16 to BPS-17 as Personal with immediate effect :-

UPGRADATION OF SETs (MALE) BS-16 TO BS-17 (PERSONAL)

S.N	S.L.#	Name of Officer & Present Place of Posting
1	1358 FSL-14	Sultan Hussain SET GHSS No.4 Peshawar.
2	1359 FSL-14	Shah Jehan A,A.E.O FR D.I.Khan.
3	1360 FSL-14	Amjad Ali SET GMS ASC Colony Nowshera.
4	1366 FSL-14	Quraish Khan SET GHS Asota Sharif Swabi.
5	1786 FSL-14	Muhammad Ali SET GMS Leganai Buner.
6	1787 FSL-14	Javed Ahmad SET GHSS Charbagh Swat.
7	1788 FSL-14	Mustaqim Shah SET GHS Kalu Khan Swabi.
8	1789 FSL-14	Ihsan Ullah SET GHS Zohrab Gul Kili Charsadda.
9	1790 FSL-14	S. Noor Ali Shah SET GMS Garhi Muhammad Gul Maira Sorizai Payan Peshawar.
10	1810 FSL-14	Altaf Hussain SET GHSS No.4 Peshawar.
11	1944 FSL-14	Muhammad Hussain SET GHS Hajizai Charsadda.
12	1951 FSL-14	Akhtar Hussain SET GMS Sattar Shah Colony Peshawar.
13	2144 FSL-14	Hamid Ullah Khan SET GHS No.1 Bannu.
14	2966 FSL-14	Muhammad Sadiq Jan SET GHSS No.4 Peshawar.
15	2970 FSL-14	Ghayas ud Din SET GHSS No.4 Peshawar.
16	3322 FSL-14	Alamgir SET GHSS Tarnab Charsadda.
17	3331 FSL-14	Abdul Majeed SET Dar Samand Hangu.
18	3379 FSL-14	Faiz ur Rehman SET GHS Wanda Madat D.I Khan.
19	3389 FSL-14	Khair Muhammad MA/B.Ed GHS. Malogo Peshawar.
20	3401 FSL-14	Inam Ullah Khan SET GHS No.2 Kulachi DI Khan.
21	3443 FSL-14	Ihsan Ullah SET GHS Topi Swabi.
22	3467 FSL-14	Israr ul Haq SET GHS Dagai Swabi.
23	3485 FSL-14	Siraj Muhammad SET GHS No.1 Salim Khan Swabi.
24	3508 FSL-14	Saeed Bakht Shah SET GHS Kotha Swabi.
25	3512 FSL-14	Ijaz Muhammad SET GHSS Tand Koi Swabi.
26	3513 FSL-14	Nazar Muhammad SET GHS Dagai Buner.
27	3515 FSL-14	Ihsan Qadir SET GHS Baja Swabi.
28	3516 FSL-13	Wazir Muhammad SET GHS Bada Gadoon Swabi.
29	3519 FSL-14	Akbar Khan SET GHS Uthla Swabi.
30	3522 FSL-14	Muhammad Zahid SET GHS Topi Swabi.
31	3528 FSL-14	Wali Ullah SET GHS Mianai Swabi.
32	3533 FSL-14	Ihsan Ullah SET GMS Gandaf Swabi.
33	3541 FSL-14	Fazal Muhammad SET GHS Dagai Swabi.
34	3545 FSL-14	Afireen Khan SET GHSS Bam Khel Swabi.
35	3549 FSL-14	Abdul Haleem SET GMS Amrai Bala Swabi.
36	3560 FSL-14	Liaqat Ali SET GMS Qazi Serai Charsadda.

DD (M.F.B)

25/7/14

20/7/14

26/7/14

Attested
Yaqub Khan
Advocate,
Courts Mardan

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37	3563 FSL-14	Fazli Rahim SET GHS Zaida Swabi.
38	3564 FSL-14	Abdul Haq SET GHS Malogo Peshawar.
39	3565 FSL-14	Fazal Ghani SET GHS Panjpir Swabi.
40	3566 FSL-14	Syed Zahir Shah SET GMS Lyran Gadoon Swabi.
41	3569 FSL-14	Muhammad Ashraf SET GHS Galham Haripur.
42	3579 FSL-14	Muhammad Amir Khan SET GHS Topai Buner.
43	3581 FSL-14	Abdul Malik SET GHS Jhanda Swabi.
44	3582 FSL-14	Biladar Khan SET GHS No.2 Maneri Payan Swabi.
45	3583 FSL-14	Adil Sher SET GMS Mathra Dagai Swabi.
46	3594 FSL-14	Noor ul Amin SET GHS Shah Mansoor Swabi.
47	3611 FSL-14	Zain ul Abideen SET GHS Maneri Payan Swabi.
48	3613 FSL-14	Mukhtiar Sarwar SET GHS Baja Swabi.
49	3617 FSL-14	Rooh ul Amin SET GHS No.1 Yar Hussain Swabi.
50	3618 FSL-14	Kaptan Ullah SET GHS Sudher Swabi.
51	3626 FSL-14	Atta ur Rehman SET GMS Musa Banda Swabi.
52	3630 FSL-14	Sher Azam Khan SET GHS Miani Swabi.
53	3632 FSL-14	Inayat Ali SET GMS Batai Swabi.
54	3633 FSL-14	Farman Ali SET GHS Karnal Sher Khan Killi Swabi.
55	3636 FSL-14	Llaq Zaman SET GMS Ghulam Swabi.
56	3639 FSL-14	Mushtaq Ali SET GHS Ismaila Swabi.
57	3654 FSL-14	Muhammad Tariq SET GMS Zaida Swabi.
58	3680 FSL-14	Muhammad Naeem SET GMS No.2 Topi Swabi.
59	3685 FSL-14	Mir Jafar SET GMS Mian Killi Swabi.
60	3698 FSL-14	Jan Bahadar SET GHS Shewa Swabi.
61	3699 FSL-14	Ashraf Khan SET GHS Maneri Payan Swabi.
62	3706 FSL-14	Rawaiz Khan SET GHS Kunda Swabi.
63	3716 FSL-14	Abdul Ahad SET GHS Gajai Gadoon Swabi.
64	3732 FSL-14	Abdullah Khan SET GHS No.2 Haripur.
65	3788 FSL-14	Hamdullah SET GHS Aslam Roshnai FR Bannu.
66	3806 FSL-14	Muhammad Adil SET GHS Dagai Swabi.
67	1360 FSL-14	Ziaul Islam GMS, Pabbi Nowshera.
68	3813 FSL-14	Muhammad Nabi SET GHS Batakara Swabi.
69	3831 FSL-14	Muhammad Arif SET GHS Adina Swabi.
70	3842 FSL-14	Zahid Jan SET GHS Ghazgi Charsadda.
71	3845 FSL-14	Sajid SET GHS Adina Swabi.
72	3846 FSL-14	Fazli Khaliq SET MA M.Ed GHS Gagai Swabi.
73	3848 FSL-14	Muhammad Bahadar SET GHS Shah Mansoor Swabi.
74	3852 FSL-14	Syed Abdul Mumin SET GHS Kala Swabi.
75	3857 FSL-14	Umar Ali SET GHS No.1 Yar Hussain Swabi.
76	3875 FSL-14	Muhammad Shuaib SET GHS Mohib Banda Nowshera.
77	3879 FSL-14	Fazli Khaliq SET GHSS Bam Khel Swabi.
78	3885 FSL-14	Khalid Khan SET GHSS Ayub Khan Killi Swabi.
79	3891 FSL-14	Siraj Ali SET GHS Palosi Orakzai Agy.
80	3902 FSL-14	Muhammad Ibrahim SET GHS No.1 Tordher Swabi.
81	3908 FSL-14	Zarin Khan SET GHS Naro Banda Swabi.
82	3912 FSL-14	Riaz Shah SET GHS Kharghali Khyber Agency.
83	3916 FSL-14	Munawar Gul SET GHS Sargara Muhammad Khan FR Lakki.
84	3937 FSL-14	Muhammad Ibrahim SET GHS Warkup Chitral.
85	3939 FSL-14	Mirwas Khan SET GHS Said Azam Killi FR Peshawar.
86	3945 FSL-14	Muhammad Jan SET GMS Torabaz Korona FR DI Khan.
87	3950 FSL-14	Ali Gohar Khan SET GHS Ganichitra Swabi.
88	3984 FSL-14	Noor Alam SET GHS Shamazan Kot NWA.

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4016 FSL-14	Nazir ur Rehman SET GHS Dab Kor Moh.Agy.
4021 FSL-14	Jamshid Khan SET GHS Muhammad Nari Charsadda.
4025 FSL-14	Muhammad Anwar SET GHS Sobati Kach FR Tank.
4041 FSL-14	Umar Khan SET GHS Muhammad Nari Charsadda.
4046 FSL-14	Muhammad Amin SET GHS Adina Swabi.
4064 FSL-14	Imtiaz Ali Khan SET GHS Sudher Swabi.
4073 FSL-14	Muhammad Siddique SET GHS No.2 Haripur.
4109 FSL-14	Rehman Janan SET GMS Nayan Banda Hangu.
4113 FSL-14	Ali Shah SET GHS Fatima Mardan.
4135 FSL-14	Javed Khan SET GHS Ghundi Jamrud Khyber Agy.
4136 FSL-14	Sher Akbar SET GHS Gulozai Peshawar.
4139 FSL-14	Shah Sikandar SET GHS Swabi.
4140 FSL-14	Abdul Majid SET GHS M.M Pole Mansehra.
4141 FSL-14	Shad Ali Khan SET GMS Rafiq Abad Swabi.
4169 FSL-14	Nasib Khan SET GHS Khoi Bahara FR DI Khan.
4182 FSL-14	Raees Iqbal SET GMS Thandkoi Swabi.
4190 FSL-14	Fida Hussain SET GHS Ramora Dir (L).
4208 FSL-14	Abid Ali Shah SET GHS Sheikh Jana Swabi.
4213 FSL-14	Obaid ur Rehman SET GHSS Nagri Bala Abbottabad.
4216 FSL-14	Faheem Ullah Jan SET GHS Ambardher Charsadda.
4233 FSL-14	Qasim Jan SET GHS Spin Kani Swabi.
4235 FSL-14	Muhammad Zafar Iqbal SET GHS No.2 Pirpai Nowshera.
4245 FSL-14	Samandar Khan SET GHS Nano SWA.
4261 FSL-14	Muhammad Haleem SET GHS Azim Qilla Bannu.
4263 FSL-14	Zaheen Ullah SET GHSS Khal Dir (L).
4286 FSL-14	Wali Khan SET GHS Malakand.
4288 FSL-14	Shabir Ahmad SET GMS Gali Banian Abbottabad.
4289 FSL-14	Bad Shah Gul SET GMS Gumbatai Dir (L).
4290 FSL-14	Mubarak Shah SET GHS Kandi Kalo Khel Nasirpur Peshawar.
	Muhammad Jamil SET GHS Shamshi Khel Bannu.

TECHNICAL

S.#	S.L.#	Name of Officer & Present Place of Posting
1	121	Muzaffar Khan SET GHS Topi Swabi.
2	131	Naseeb Zada SET GMS Ghari Shah Muhammad Haripur.

FEMALE

S.#	S.L.#	Name of Officer & Present Place of Posting
1	302 FSL-14	Iqbal Tawab, SET, GGMS Mandawa Distt Karak.
2	329 FSL-14	Shaukat Nasreen SET GGMS Zando Dheri Mardan.
3	851 FSL-14	Noor Zia SET GGCMs Maira Achini Peshawar.
4	880 FSL-14	Farida Bibi GGHS Mastuj Chitral.
5	1178 FSL-14	Zainab Begum SET GGHS Khal Dir (L).
6	1189 FSL-14	Nasim Begum SET GGHS Charbagh Swat.
7	1227 FSL-14	Sardar Jehan SET GGHS Panr Swat.
8	1246 FSL-14	Shehnela Arjumand SET GGHS Taimargara Dir (L).
9	1247 FSL-14	Seema Afridi SET GGHS Sufaid Sang Peshawar.
10	1248 FSL-14	Moghees Begum SET GGHS Landi Kotal Khy.Agy.
11	1248-A FSL-14	Shazia Afridi GGMS Torki Ismail Khel FR Kohat.
12	1253 FSL-14	Nishat Saeed SET GGMS Kass Dir (U).
13	1380 FSL-14	Syeda Qurat ul Ain SET GGHS Jhangi Abbottabad.
14	1381 FSL-14	Saeeda Bano SET GGHS Kuthiala Abbottabad.

15	1382 FSL-14	Shaukat Begum SET GGMS Sazo Din Killi Mardan.
16	1383 FSL-14	Shahnaz Umar SET GGHS Halmaira Abbottabad.
17	1384 FSL-14	Naseem Akhtar SET GCGHSS Peshawar.
18	1385 FSL-14	Farhat Jamal Ullah SET GGHS Islamia Collegiate Peshawar.
19	1386 FSL-14	Ishrat Begum SET GGHS Civil Colony Peshawar.
20	1387 FSL-14	Surriya Begum SET GGMS Jalala Mardan.
21	1388 FSL-14	Humera Bibi SET GGHS Dheri Alladand Malakand.
22	1389 FSL-14	Shazadi Nadia Safdar SET GGHS Chapra Haripur.
23	1390 FSL-14	Surriya Khatoon SET GGHS Kag Haripur.
24	1391 FSL-14	Asma Naz SET GGMS Muhammad Anwar FR Bannu.
25	1392 FSL-14	Naseem Ara SET GGHS Pirsabaq Nowshera.
26	1393 FSL-14	Farda Begum SET GGMS Pind Hashim Khan Haripur.
27	1394 FSL-14	Nasreen Kausar SET GGHS Civil Quarter Peshawar.
28	1395 FSL-14	Sajida Yasmin SET GGHS PK Khan Abbottabad.
29	1396 FSL-14	Riaz Akhtar SET GGMS Sar Bilandpura Peshawar.
30	1397 FSL-14	Ruqiya Khatoon SET GGMS Sangian Haripur.
31	1398 FSL-14	Naz Perveen SET GGMS Sattar Shah Dabgari Peshawar.
32	1399 FSL-14	Bibi Surriya SET GGHS Havelian Abbottabad.
33	1400 FSL-14	Rakhshanda Qamar SET GGMS Habibullah Korona Jehangira Nowshera.
34	1401 FSL-14	Bibi Nusrat SET GGMS Koza Bandai Swat.
35	1402 FSL-14	Najmu Saba SET GGHS Lady Grifith Peshawar.
36	1403 FSL-14	Farida Begum SET GGMS Risalpur Cantt Nowshera.
37	1404 FSL-14	Maqbool Jan SET GGMS Banda Said Khan Abbottabad.
38	1405 FSL-14	Rehana Zaman SET GGMS Guli Jan Korona FR Tank.
39	1406 FSL-14	Waheeda Shereen SET GGMS (Girls) Mansehra.
40	1407 FSL-14	Khalida Kausar SET GGHS KDA Kohat.
41	1408 FSL-14	Farzana Rasool SET GGMS Garyala Mardan.
42	1409 FSL-14	Hussan Naz SET GGMS Rahim Abad Swat.
43	1410 FSL-14	Nasim Qamar SET GGHS Maho Dheri Mardan.
44	1411 FSL-14	Shahida Burki SET GGMS Gula Din FR Tank.
45	1412 FSL-14	Nargis Bibi SET GGMS Abdul Ghaffar Banda Mardan.
46	1413 FSL-14	Bakht Jehan SET GGHS Badwan Dir (L).
47	1414 FSL-14	Tahira Sultana SET GGMS Dheri Maira Abbottabad.
48	1415 FSL-14	Ramim Taj SET GGMS Shamshad Abad Mardan.
49	1416 FSL-14	Neelofar Taj SET GGMS Bala Garhi Mardan.
50	1417 FSL-14	Zeenat Khattak SET GGHS Manki Sharif Nowshera.
51	1418 FSL-14	Sayeda Qamar SET GGHS Kaghan Mansehra.
52	1419 FSL-14	Tajwar Sultana SET GGMS Khwaja Mad Mandan Bannu.
53	1420 FSL-14	Mussarat Naheed SET GGMS Sararogha SWA.
54	1421 FSL-14	Rozina Hayat SET GGHS Achini Payan Peshawar.
55	1422 FSL-14	Shahida SET GGCHSS Dabgari Peshawar.
56	1423 FSL-14	Rizwana Akhtar SET GGHS Miran Shah NWA.
57	1424 FSL-14	Rubina Farid SET, GGCMS No.1 Abbottabad.
58	1424-A FSL-14	Nazra Yaqub CMS (Girls) Chabrian Abbottabad.
59	1424-B FSL-14	Azra Jabeen GGHS Marghuz Sawabi.
60	1424-C FSL-14	Rukhsana Jabeen GGHS Gandaf Swabi.
61	1424-D FSL-14	Salma Saadat GGHS Marghuz Sawabi.
62	1424-E FSL-14	Jameela Amir GGMS Garhi Atta Mohammad Peshawar.
63	1424-F FSL-14	Rosin Begum GGMS Heroshah Malakand.
64	1424-G FSL-14	Mehar Angaiz Irum GGHS (BSD) Peshawar.
65	1424-H FSL-14	Khalida Nasirullah GGHS Torlandi Swabi.
66	1424-I FSL-14	Naheed Anwar GGMS Feroz Mella Dara Adam Khel FR-Kohat.
67	1424-J FSL-14	Umme Kalsoom GGHS Shawa Dir Lower.
68	1424-K FSL-14	Razia Arifa GGMS Khwaja Mir Killy Peshawar.
69	1424-L FSL-14	Nayyara Aziz GGHS Baldher Harinur

(10)

70	1424-M FSL-14	
71	1424-N FSL-14	Ruqia Naz GGMS, Bigakot Abbottabad.
72	1448 FSL-14	Mubashra Gul GGPCMS Pirpai Nowshera.
73	1449 FSL-14	Muhsina Zahir Ali SET GGHS Kityari Dir (L).
74	1450 FSL-14	Farhat Rana SET GGHS No.2 Peshawar Cantt.
75	1451 FSL-14	Yasmin Bilal SET GGHS No.1 Saidu Sharif Swat.
76	1452 FSL-14	Sabiha Khanum SET GGHS Kaga Wala Peshawar.
77	1453 FSL-14	Fazeelat Begum SET GGHS Pirpai Nowshera.
78	1454 FSL-14	Shahnaz Begum SET GGHS Nowshera Kalan.
79	1455 FSL-14	Rubina Ismail SET GGHS No.8 Sherazi DI Khan.
80	1455-A FSL-14	Munazza Shabnam SET GGHS Dhodial Mansehra.
81	1455-B FSL-14	Rafia Iqbal GGHS Wanda Hissam D.I.Khan.
82	1455-C FSL-14	Bushra Qasim GGMS Manja Swat.
83	1455-D FSL-14	Alia GGHS Sakhakot MKD.
84	1455-E FSL-14	Bibi Fakhraun Nisa GGHS Kota Swabi.
85	1455-F FSL-14	Shaista Taskeem GGHS Salim Khan Swabi.
		Tahira Aziz GGHS Topi Swabi.

Endst. No. & date as above.

SECRETARY

Copy forwarded to:

1. The Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department.
2. The Secretary to Govt. of Khyber Pakhtunkhwa, Finance 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, Abbotabad.
8. The Director ESRU, Khyber Pakhtunkhwa.
9. The District Education Officers, Elementary & Secondary Education concerned.
10. The District Accounts Officers concerned.
11. PS to Secretary E&SE Department.
12. SETs concerned.
13. Office File.

(ZAMIN KHAN MOMAND)
SECTION OFFICER (PRIMARY)

Attested
Yaqub Khan
Yaqub Khan
Advocate
Distt: Courts Mardan

Before the ~~the~~ chief Secretary ^{(II) Aux D} KPK Peshawar

Quarish SST teacher GHS Asota

Teh: & Distt: Swabi - - - - - Appellant.

VS

1. Secretary (E & SE) KPK Peshawar
 2. Director of (E & SE) KPK Peshawar
- Respondents

Appeal against order of Resolt: no 1 dated 23/7/2014, whereby appellant is upgraded from BPs-16 to BPs-17 w.e.f 23/7/2014 instead of 01-10-2007 as per notification of Govt of KPK dated 26/1/2008

Respectfully sheweth:-

1. That appellant is posted as SST teacher in GHS Asota Teh: & Distt: Swabi with the respondent department.
2. That appellant was appointed as a SET teacher with respondent department vide order.

3. That appellant has completed his service in BPs-16 as a SET teacher on 23/10/2005 and also granted relaxation of pay on the basis of FR-22 CBS vide order dated 26/3/1996.
4. That respondent department has issued a notification dated 26/1/2008, whereby, upgradation for the incumbents of the post as per detail given in the said notification is ^{entitled} allowed for upgradation of BPs-1 on completion of his 10x years service in BPs-16 as a SET teacher vide notification dated 26/1/2008.
(copy of notification is attached as Aux B).
5. That appellant is entitled for upgradation of BPs-17 w.e.f 01-10-2007 instead of 23/07/2014 as per notification dated 26/1/2008.

It is therefore, humbly requested that appellant may please be upgraded in BPs-17 from BPs-16 w.e.f 01/10/2007 instead of 23/7/2014 with all back benefit.

Dated 21/08/2014 Through Counsel: Appellant. Guraish...

بعد الت سروسز ٹریبونل کے لئے

کورٹ فیس

مورخہ: 18 دسمبر 2014ء منجانب والا نے و
مقدمہ: فرسٹ ٹران SET بنام: صف سکرٹری KSK وغیرہ

دعویٰ: اپیل

جرم:

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی ذیل کارروائی متعلقہ آن مقام کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی نقل کارروائی کا مکمل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ و تقرر ثالث و فیصلہ پر حلف دینے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرانے اجراء اور وصولی چیک روپیہ اور عرضی دعویٰ اور درخواست ہر قسم کی تصدیق زرا اس پر دستخط کرنے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری یک طرفہ یا اپیل کی برآمد ہوگی اور منسوخی دائر کرنے کی اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مذکور کے عمل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنی ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی جملہ مذکورہ بالا اختیارات حاصل ہونگے اور اس کا ساختہ برداختہ منظور و قبول ہوگا اور دوران مقدمہ میں جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب سے ہوگا اسکے مستحق وکیل صاحب ہونگے۔ نیز بقایا خرچہ کی وصولی کرتے وقت کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہونگے کی پیروی مقدمہ مذکور لہذا وکالت نامہ لکھ دیا تاکہ سند ہے۔

18 ماہ دسمبر 2014ء

بد گواہ شد

کے لئے منظور ہے۔

بمقام:

Attested & Accepted

Yous
Yaqub Khan
Advocate,
11st, Courts Mardan

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BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No: 1417 /2014

Quresh Khan SETGHS Asota District Swabi

.....Appellant.

VERSUS

Secretary E&SE Department, Khyber Pakhtunkhwa & others.

.....Respondents

PARAWISE COMMENTS FOR & ON BEHALF OF RESPONDENTS No: 1-3.

Respectfully Sheweth :-

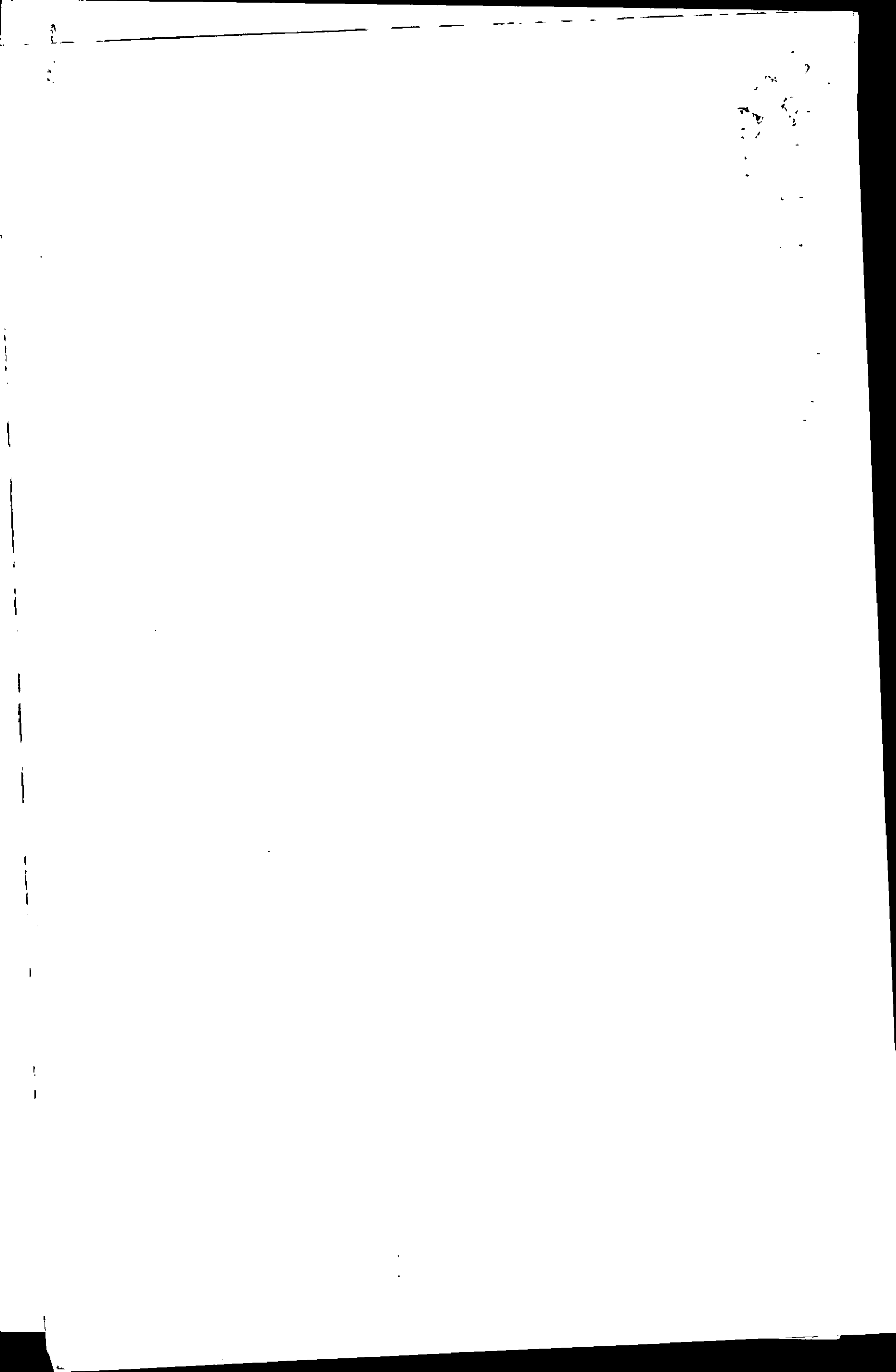
The Respondents submit as under:-

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 malafide 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 he has sought from this Honorable Tribunal.
- 7 That the instant Service Appeal is against the prevailing law & rules.
- 8 That the Appellant is not an aggrieved person.
- 9 That the Appellant has been treated as per law, rules & up-gradation policy.
- 10 That the Appeal is not maintainable in its present form.
- 11 That the instant appeal is bad for mis-joinder & non-joinder of the necessary parties.
- 12 That the instant Service Appeal is barred by law.
- 13 That the Appellant is not competent to file the instant appeal against the Respondents.
- 14 That the Notifications dated 23-7-2014 & 21-8-2014 are legally competent & in accordance with the upgradation policy.

ON FACTS

- 1 That Para-1 needs no comments being pertains to the service record of the appellant.
- 2 That Paa-2 is also needs no comments being pertains to the service record of the appellant.



- 3 That Para-3 is incorrect & misleading. The appellant has not annexed the referred Notification dated 26-3-1996 in support of his plea regarding grant of relaxation of pay under the FR-22, hence is not sustainable.
- 4 That Para-4 is correct to the extent that the Respondent department has issued a Notification No: FD /SO(FR) 10-22/07 dated 26-01-2008 through the Finance Department Govt: of Khyber Pakhtunkhwa, vide which the post of SET has been upgraded from BPS-16 to 17(Personal) in the light of the upgradation policy, whereby upgradation has been allowed wef 01-10-2007.

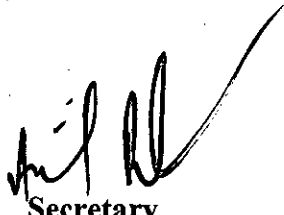
Therefore, the Respondent Department vide Notification No: SO(PE)/E&SED/2-6/DPC Meeting dated 23-07-2014 has been pleased to allow upgradation of posts from BPS-16 to 17 (Personal) to the appellant with immediate effect issued by the Respondent No: 2 after processing the case complete in all respect before the Departmental Promotion Committee. (Copy of the said Notification as Annexure-A).

- 5 That Para-5 is incorrect & denied. The appellant has been treated as per law, rules & upgradation policy vide Notification 23-7-2014 by the Respondent No: 2, hence the stand of the appellant regarding the grant of upgradation wef 01-10-2007 is without any legal force, because due to non submission of the required documents including ACRs etc: by the appellant in time has caused delay in the issuance of he impugned Notification as mentioned above by the Respondent No: 2.
- 6 That Para-6 is incorrect & denied. The appellant has been up-graded against the SET in BPS-17 (personal) in the light of the upgradation policy of the Provincial Gov: vide impugned Notification date 23-7-2014 with immediate effect and in the interest of public service by the Respondent No: 2.
- 7 That Para-7 is incorrect & denied. No departmental appeal has been filed by the appellant. Nor any such record is available in the office of the Respondents till date.
- 8 That Para-8 is incorrect & denied. The statement of the appellant is against the law, rules & upgradation policy, hence not sustainable in the eyes of law, hence the impugned Notification dated 23-4-2014 is in accordance with the relevant policy & is liable to be maintained in the interest of justice. However, the Respondents further submit on the following grounds inter alia :-

GROUNDS

- A Incorrect & denied. The impugned Notification dated 23-7-2014 is in accordance with law, rules & policy, hence is liable to be maintained in favour of the Respondents.
- B Incorrect & denied. The statement of the appellant is against the facts & circumstances of the instant case as mentioned in the foregoing paras by the Respondents.
- C Incorrect & denied. The appellant has been made entitled for the grant of promotion vide Notification dated 23-7-2014 by the Respondents in the light of the above mentioned Notification in accordance with law, rules & policy.
- D Incorrect & denied. Hence needs no further comments.
- E Incorrect & denied. The statement of the appellant is against the facts & circumstances of the case as mentioned above. Because the instant appeal is badly time barred & is liable to be dismissed in favour of the Respondents. However the Respondents seek leave of this Honorable Tribunal to advance additional grounds, record & case law at the time of arguments on the date fixed.

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 favour of the Respondent Department.




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



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

AFFIDAVIT

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


Deponent



GOVERNMENT OF KHYBER PAKHTUNKHWA
 PRIMARY & SECONDARY EDUCATION DEPARTMENT

Dated Peshawar the 23-07-2014

Auxiliary
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Annex
 "A"

ESDE

NOTIFICATION

No. 50(PE)/ESDE/2-G/DPC/Meeting(29-05-2014). On the recommendations of the Departmental Promotion Committee meeting held on 29-05-2014, the Competent Authority is pleased to upgrade the following Male/Female SETs from BPS-16 to BPS-17 as Personal with immediate effect:

GRADUATION OF SETs (MALE) BS-16 TO BS-17 (PERSONAL):

S.N.	S.L.N.	Name of Officer & Present Place of Posting
1	1358 FSL-14	Sultan Hussain SET GHSS No.4 Peshawar.
2	1359 FSL-14	Shah Jehan A,A.E.O FR D.I.Khan.
3	1360 FSL-14	Amjad Ali SET GMS ASC Colony Nowshera.
4	1366 FSL-14	Quraish Khan SET GHS Asota Sharif Swabi.
5	1786 FSL-14	Muhammad Ali SET GMS Leranai Buner.
6	1787 FSL-14	Javed Ahmad SET GHSS Charbagh Swat.
7	1788 FSL-14	Mustaqim Shah SET GHS Kair Khan Swabi.
8	1789 FSL-14	Ihsan Ullah SET GHS Zohrab Gul Kili Charsadda.
9	1790 FSL-14	S. Noor Ali Shah SET GMS Garhi Muhammad Gul Maira Sorzai Payan Peshawar.
10	1810 FSL-14	Altaf Hussain SET GHSS No.4 Peshawar.
11	1844 FSL-14	Muhammad Hussain SET GHS Hafizai Charsadda.
12	1951 FSL-14	Akhtar Hussain SET GMS Sattar Shah Colony Peshawar.
13	2144 FSL-14	Hamid Ullah Khan SET GHS No.1 Bannu.
14	2066 FSL-14	Muhammad Sadiq Jan SET GHSS No.4 Peshawar.
15	2070 FSL-14	Ghayas ud Din SET GHSS No.4 Peshawar.
16	3322 FSL-14	Alamgir SET GHSS Tarnab Charsadda.
17	3331 FSL-14	Abdul Majeed SET Dar Samand Hangu.
18	3370 FSL-14	Faiz ur Rehman SET GHS Wanda Madat D.I Khan.
19	3389 FSL-14	Khair Muhammad MA/B.Ed GHS. Malogo Peshawar.
20	3401 FSL-14	Inam Ullah Khan SET GHS No.2 Kulachi DI Khan.
21	3443 FSL-14	Ihsan Ullah SET GHS Topi Swabi.
22	3467 FSL-14	Israr ul Haq SET GHS Dagai Swabi.
23	3485 FSL-14	Siraj Muhammad SET GHS No.1 Salim Khan Swabi.
24	3508 FSL-14	Saeed Bakht Shah SET GHS Kotla Swabi.
25	3512 FSL-14	Ijaz Muhammad SET GHSS Tard Koi Swabi.
26	3513 FSL-14	Nazar Muhammad SET GHS Dagai Buner.
27	3515 FSL-14	Ihsan Qadir SET GHS Baja Swabi.
28	3516 FSL-13	Wazir Muhammad SET GHS Bada Gadoon Swabi.
29	3519 FSL-14	Akbar Khan SET GHS Uthla Swabi.
30	3522 FSL-14	Muhammad Zahid SET GHS Topi Swabi.
31	3528 FSL-14	Wali Ullah SET GHS Mianai Swabi.
32	3533 FSL-14	Ihsan Ullah SET GMS Gandaf Swabi.
33	3541 FSL-14	Fazal Muhammad SET GHS Dagai Swabi.
34	3545 FSL-14	Afireen Khari SET GHSS Dam Khel Swabi.
35	3549 FSL-14	Abdul Haleem SET GMS Amrai Bala Swabi.
36	3560 FSL-14	Liaqat Ali SET GMS Qazi Serai Charsadda.

DD (MFB)

25/7/14

26/7/14

26/7/14

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Accepted
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 23/07/2014
 23/07/2014
 23/07/2014

3563 FSL-14	Fazli Rahim SET GHS Zaida Swabi.
3564 FSL-14	Abdul Haq SET GHS Malog, Peshawar.
3565 FSL-14	Fazal Ghani SET GHS Panjpir Swabi.
3566 FSL-14	Syed Zahir Shah SET GMS Lyran Gadoon Swabi.
3569 FSL-14	Muhammad Ashraf SET GHS Galham Haripur.
3579 FSL-14	Muhammad Amir Khan SET GHS Topai Buner.
3581 FSL-14	Abdul Malik SET GHS Jhanda Swabi.
3582 FSL-14	Diladar Khan SET GHS No.2 Maneri Payan Swabi.
3583 FSL-14	Atil Sher SET GMS Mathra Dagai Swabi.
3594 FSL-14	Noor ul Amin SET GHS Shah Mansoor Swabi.
3611 FSL-14	Zain ul Abideen SET GHS Maneri Payan Swabi.
3613 FSL-14	Mukhtiar Sarwar SET GHS Baja Swabi.
3617 FSL-14	Rooh ul Amin SET GHS No.1 Yar Hussain Swabi.
3618 FSL-14	Kaptan Ullah SET GHS Sudher Swabi.
3626 FSL-14	Atta ur Rehman SET GMS Musa Banda Swabi.
3630 FSL-14	Sher Azam Khan SET GHS Miani Swabi.
3632 FSL-14	Inayat Ali SET GMS Batai Swabi.
3633 FSL-14	Farman Ali SET GHS Karnal Sher Khan Killi Swabi.
3636 FSL-14	Liaq Zaman SET GMS Ghulaman Swabi.
3639 FSL-14	Mushtaq Ali SET GHS Ismaila Swabi.
3654 FSL-14	Muhammad Tariq SET GMS Zaida Swabi.
3680 FSL-14	Muhammad Naeem SET GMS No.2 Topi Swabi.
3685 FSL-14	Mir Jafar SET GMS Mian Killi Swabi.
3698 FSL-14	Jan Bahadar SET GHS Shewa Swabi.
3699 FSL-14	Ashraf Khan SET GHS Maneri Payan Swabi.
3706 FSL-14	Rawaiz Khan SET GHS Kunda Swabi.
3716 FSL-14	Abdul Ahad SET GHS Gagai Gadoon Swabi.
3732 FSL-14	Abdullah Khan SET GHS No.2 Haripur.
3788 FSL-14	Hamdullah SET GHS Aslam Roshnai FR Bannu.
3806 FSL-14	Muhammad Adil SET GHS Dagai Swabi.
1360 FSL-14	Ziaul Islam GMS, Pabbi Nowshera.
3813 FSL-14	Muhammad Nabi SET GHS Batakara Swabi.
3831 FSL-14	Muhammad Arif SET GHS Adina Swabi.
3842 FSL-14	Zahid Jan SET GHS Ghazgi Charsadda.
3845 FSL-14	Sajid SET GHS Adina Swabi.
3846 FSL-14	Fazli Khaliq SET MA M.Ed GHS Gagai Swabi.
3848 FSL-14	Muhammad Bahadar SET GHS Shah Mansoor Swabi.
3852 FSL-14	Syed Abdul Mumin SET GHS Kala Swabi.
3857 FSL-14	Umar Ali SET GHS No.1 Yar Hussain Swabi.
3875 FSL-14	Muhammad Shuaib SET GHS Mohib Banda Nowshera.
3879 FSL-14	Fazli Khaliq SET GHSS Bum Khet Swabi.
3885 FSL-14	Khalid Khan SET GHSS Ayub Khan Killi Swabi.
3891 FSL-14	Siraj Ali SET GHS Palosi Orakzai Agy.
3902 FSL-14	Muhammad Ibrahim SET GHS No.1 Tordher Swabi.
3908 FSL-14	Zarin Khan SET GHS Naro Banda Swabi.
3912 FSL-14	Riaz Shah SET GHS Kharghali Khyber Agency.
3916 FSL-14	Munawar Gul SET GHS Sargara Muhammad Khan FR Lakki.
3937 FSL-14	Muhammad Ibrahim SET GHS Warkup Chitral.
3939 FSL-14	Mirwas Khan SET GHS Said Azam Killi FR Peshawar.
3945 FSL-14	Muhammad Jan SET GMS Torabaz Korona FR DI Khan.
3950 FSL-14	Ali Gohar Khan SET GHS Ganichitra Swabi.
3984 FSL-14	Noor Alam SET GHS Shamazan Kot NWA.

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95	4016 FSL-14	Nazir ur Rehman SET GHS Dab Kor Moh. Agy.
96	4021 FSL-14	Jamshid Khan SET GHS Muhammad Nari Charsadda.
97	4025 FSL-14	Muhammad Anwar SET GHS Sobati Kach FR Tank.
98	4041 FSL-14	Umar Khan SET GHS Muhammad Nari Charsadda.
99	4046 FSL-14	Muhammad Amin SET GHS Adina Swabi.
100	4047 FSL-14	Imtiaz Ali Khan SET GHS Sudher Swabi.
101	4064 FSL-14	Muhammad Siddique SET GHS No.2 Haripur.
102	4073 FSL-14	Rehman Janan SET GMS Nayan Banda Hangu.
103	4109 FSL-14	Ali Shah SET GHS Fatima Mardan.
104	4113 FSL-14	Javed Khan SET GHS Ghundi Jamrud Khyber Agy.
105	4135 FSL-14	Sher Akbar SET GHS Gulozai Peshawar.
106	4136 FSL-14	Shah Sikandar SET GHS Swabi.
107	4139 FSL-14	Abdul Majid SET GHS M.M Pole Manshira.
108	4140 FSL-14	Shad Ali Khan SET GMS Rafiq Abad Swabi.
109	4141 FSL-14	Nasib Khan SET GHS Khoi Bahara FR DI Khan.
110	4169 FSL-14	Races Iqbal SET GMS Thandkoi Swabi.
111	4182 FSL-14	Fida Hussain SET GHS Ramora Dir (L).
112	4190 FSL-14	Abid Ali Shah SET GHS Sheikh Jana Swabi.
113	4208 FSL-14	Obaid ur Rehman SET GHSS Nagri Bala Abbottabad.
114	4213 FSL-14	Faheem Ullah Jan SET GHS Ambaridher Charsadda.
115	4216 FSL-14	Qasim Jan SET GHS Spin Kani Swabi.
116	4233 FSL-14	Muhammad Zafar Iqbal SET GHS No.2 Pirpai Nowshera.
117	4235 FSL-14	Samandar Khan SET GHS Nano SWA.
118	4245 FSL-14	Muhammad Haleem SET GHS Azim Qilla Bannu.
119	4261 FSL-14	Zaheen Ullah SET GHSS Khai Dir (L).
120	4263 FSL-14	Wali Khan SET GHS Malakand.
121	4286 FSL-14	Shabir Ahmad SET GMS Gali Banian Abbottabad.
122	4288 FSL-14	Bad Shah Gul SET GMS Gumbatai Dir (L).
123	4289 FSL-14	Mubarak Shah SET GHS Kandi Kale Khoi Nesirpur Peshawar.
124	4290 FSL-14	Muhammad Jamil SET GHS Shamshi Khel Bannu.

TECHNICAL

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S.#	S.L.#	Name of Officer & Present Place of Posting
1	121	Muzaffar Khan SET GHS Topi Swabi.
2	131	Naseeb Zada SET GMS Ghari Shah Muhammad Haripur.

FEMALE

S.#	S.L.#	Name of Officer & Present Place of Posting
1	302 FSL-14	Iqbal Tawab, SET, GGMS Manda wa Distt Karak.
2	329 FSL-14	Shaukat Nasreen SET GGMS Zando Dheri Mardan.
3	851 FSL-14	Noor Zia SET GGMS Maira Achini Peshawar.
4	880 FSL-14	Farida Bilal GGHS Mastuj Chitral.
5	1178 FSL-14	Zahab Begum SET GGHS Khai Dir (L).
6	1189 FSL-14	Nasim Begum SET GGHS Charbagh Swat.
7	1227 FSL-14	Sardar Jehan SET GGHS Panr Swat.
8	1246 FSL-14	Shehnela Arjumand SET GGHS Taimargara Dir (L).
9	1247 FSL-14	Seema Afridi SET GGHS Sufaid Sang Peshawar.
10	1248 FSL-14	Moghees Begum SET GGHS Landi Kotal Khy. Agy.
11	1248-A FSL-14	Shazia Afridi GGMS Torki Ismail Khel FR Kohat.
12	1253 FSL-14	Nishat Saeed SET GGMS Kass Dir (U).
13	1380 FSL-14	Syeda Qurat ul Ain SET GGHS Jhangi Abbottabad.
14	1381 FSL-14	Saeeda Bano SET GGHS Kuthiala Abbottabad.

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15	1382 FSL-14	Shaukat Begum SET GGMS Sazo Din Killi Mardan.
16	1383 FSL-14	Shahnaz Umar SET GGHS Halmaira Abbottabad.
17	1384 FSL-14	Naseem Akhtar SET GCGHSS Peshawar.
18	1385 FSL-14	Farhat Jamal Ullah SET GGHS Islamia Collegiate Peshawar.
19	1386 FSL-14	Ishrat Begum SET GGHS Civil Colony Peshawar.
20	1387 FSL-14	Surriya Begum SET GGMS Jalala Mardan.
21	1388 FSL-14	Humera Bibi SET GGHS Dheri Alladand Malakand.
22	1389 FSL-14	Shazadi Nadia Saifdar SET GGHS Chapra Haripur.
23	1390 FSL-14	Surriya Khatoon SET GGHS Kap Haripur.
24	1391 FSL-14	Asma Naz SET GGMS Muhammad Anwar FR Bannu.
25	1392 FSL-14	Naseem Ara SET GGHS Pirsabaq Nowshera.
26	1393 FSL-14	Farda Begum SET GGMS Pind Hashim Khan Haripur.
27	1394 FSL-14	Nasreen Kausar SET GGHS Civil Quarter Peshawar.
28	1395 FSL-14	Sajida Yasmin SET GGHS PK Khan Abbottabad.
29	1396 FSL-14	Riaz Akhtar SET GGMS Sar Bilandpura Peshawar.
30	1397 FSL-14	Ruqiya Khatoon SET GGMS Sangian Haripur.
31	1398 FSL-14	Naz Perveen SET GGMS Sattar Shah Dabgari Peshawar.
32	1399 FSL-14	Bibi Surriya SET GGHS Havelian Abbottabad.
33	1400 FSL-14	Rakhshanda Qamar SET GGMS Habibullah Korona Jehangira Nowshera.
34	1401 FSL-14	Bibi Nusrat SET GGMS Koza Bandai Swat.
35	1402 FSL-14	Najmu Saba SET GGHS Lady Griffith Peshawar.
36	1403 FSL-14	Farida Begum SET GGMS Risalpur Cantt Nowshera.
37	1404 FSL-14	Maqbool Jan SET GGMS Banda Saif Khan Abbottabad.
38	1405 FSL-14	Rehana Zaman SET GGMS Guli Jan Korona FR Tank.
39	1406 FSL-14	Waheeda Shereen SET GGMS (Girls) Mansehra.
40	1407 FSL-14	Khalida Kausar SET GGHS KDA Kohat.
41	1408 FSL-14	Farzana Rasool SET GGMS Garyala Mardan.
42	1409 FSL-14	Hussan Naz SET GGMS Rahim Abad Swat.
43	1410 FSL-14	Nasim Qamar SET GGHS Maho Dheri Mardan.
44	1411 FSL-14	Shahida Burki SET GGMS Gula Din FR Tank.
45	1412 FSL-14	Nargis Bibi SET GGMS Abdul Ghaffar Banda Mardan.
46	1413 FSL-14	Bakht Jehan SET GGHS Badwan Dir (L).
47	1414 FSL-14	Tahira Sultana SET GGMS Dheri Maira Abbottabad.
48	1415 FSL-14	Ramim Taj SET GGMS Shamsad Abad Mardan.
49	1416 FSL-14	Neeofar Taj SET GGMS Bala Garhi Mardan.
50	1417 FSL-14	Zeenat Khattak SET GGHS Manki Sharif Nowshera.
51	1418 FSL-14	Sayeda Qamar SET GGHS Kaghan Mansehra.
52	1419 FSL-14	Tajwar Sultana SET GGMS Khwaja Mad Mandan Bannu.
53	1420 FSL-14	Mussarat Naheed SET GGMS Sararogha SWA.
54	1421 FSL-14	Rozina Hayat SET GGHS Achini Payan Peshawar.
55	1422 FSL-14	Shahida SET GGCHSS Dabgari Peshawar.
56	1423 FSL-14	Rizwana Akhtar SET GGHS Miran Shali NWA.
57	1424 FSL-14	Rubina Farid SET, GGMS No.1 Abbottabad.
58	1424-A FSL-14	Nazra Yaqub CMS (Girls) Chabrian Abbottabad.
59	1424-B FSL-14	Azra Jabeen GGHS Marghuz Sawabi.
60	1424-C FSL-14	Rukhsana Jabeen GGHS Gandaf Swabi.
61	1424-D FSL-14	Salma Saadat GGHS Marghuz Sawabi.
62	1424-E FSL-14	Jameela Amir GGMS Garhi Atta Mohammad Peshawar.
63	1424-F FSL-14	Rosin Begum GGMS Heroshah Malakand.
64	1424-G FSL-14	Mehar Angaiz Irum GGHS (BSD) Peshawar.
65	1424-H FSL-14	Khalida Nasirullah GGHS Torlandi Swabi.
66	1424-I FSL-14	Naheed Anwar GGMS Feroz Mella Dara Adam Khel FR-Kohat.
67	1424-J FSL-14	Umme Kalsoom GGHS Shawa Dir Lower.
68	1424-K FSL-14	Razia Arifa GGMS Khwaja Mir Killy Peshawar.
69	1424-L FSL-14	Nayyara Aziz GGHS Baldher Haripur.

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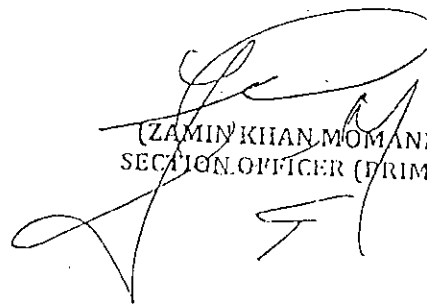
70	1424-M FSL-14	Ruqia Naz GGMS, Bigakot Abbottabad.
71	1424-N FSL-14	Mubashra Gul GGPCMS Pirpai Nowshera.
72	1448 FSL-14	Muhsina Zahir Ali SET GGHS Kityari Dir (L).
73	1449 FSL-14	Farhat Rana SET GGHS No.2 Peshawar Cantt.
74	1450 FSL-14	Yasmin Bilal SET GGHS No.1 Saidu Sharif Swat.
75	1451 FSL-14	Sabiha Khanum SET GGHS Kaga Wala Peshawar.
76	1452 FSL-14	Fazeelat Begum SET GGHS Pirpai Nowshera.
77	1453 FSL-14	Shahnaz Begum SET GGHS Nowshera Kalan.
78	1454 FSL-14	Rubina Ismail SET GGHS No.8 Sherazi Di Khan.
79	1455 FSL-14	Munazza Shabnam SET GGHS Dhodial Mansehra.
80	1455-A FSL-14	Rafia Iqbal GGHS Wanda Hissam D.I.Khan.
81	1455-B FSL-14	Bushra Qasim GGMS Manja Swat.
82	1455-C FSL-14	Alia GGHS Sakhakot MKD.
83	1455-D FSL-14	Bibi Fakhraun Nisa GGHS Kota Swabi.
84	1455-E FSL-14	Shaista Taskeem GGHS Salim Khan Swabi.
85	1455-F FSL-14	Tahira Aziz GGHS Topi Swabi.

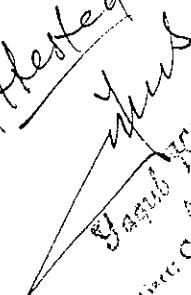
SECRETARY

Endst. No. & date as above.

Copy forwarded to:

1. The Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department.
2. The Secretary to Govt. of Khyber Pakhtunkhwa, Finance 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, Abbotabad.
8. The Director ESRU, Khyber Pakhtunkhwa.
9. The District Education Officers, Elementary & Secondary Education concerned.
10. The District Accounts Officers concerned.
11. PS to Secretary E&SE Department.
12. SETs concerned.
13. Office File.


 (ZAMIN KHAN MOMAND)
 SECTION OFFICER (PRIMARY)

Attested
yus

 Shagufta Khan
 Accounts Officer
 www.comptroller.gov.pk