


FORM OF ORDER SHEET

Court of _____

Appeal No. 653/2024

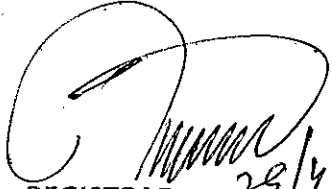
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	13/05/2024	<p>The appeal of Mst. Rani Gul resubmitted today by Mr. Mujeeb Ullah Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 15.05.2024. Parcha Peshi given to the counsel for the appellant .</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal of Mst. Rani Gul received today i.e on 26.04.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal be signed by the appellant.
- 2- Affidavit is not attested by the Oath Commissioner. *Poran-4*
- 3- Copies of impugned orders dated 11.04.2023 and 13.10.2023 mentioned in the heading of appeal are not attached with the appeal be placed on it.
- 4- Copy of departmental appeal is not attached with the appeal be placed on it.
- 5- Documents/annexures referred to in the memo of appeal are not attached with the appeal be placed on it.
- 6- In the memo of appeal many places have been left blank be filled up.
- 7- The documents that are to be provided must be readable/legible.
- 8- Five more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 989 /S.T,

Dt. 29/4 /2024.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Mujeebullah Adv.
High Court Peshawar.

Dear Sir,

All observations completed,

affidavit been signed

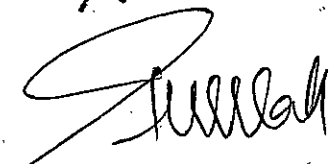
There is no order dated

11/4/2023 That is
mistakenly mentioned



13/5/24

Advocate



13/5/2024

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

Mst Rani Gul

VERSUS

Director Elementary & Secondary Education KP & Others.

Appeal No 683/2024

INDEX OF DOCUMENTS

S.No	Description of Documents	Annexure	Page No
1	Memorandum of Appeal along with Affidavit		1-12
2	Address of Parties		06
3	Copy of Appointment order	A	12-12/A
4	Copies of transfer and promotion orders	B	13-16/A
5	Copies of Application submitted to DEO Female	C	17-18/A
6	Copy of impugned office order	D	19-19/A
7	Copy of departmental Appeal	E	20-20/A
8			

Rani Gul
Appellant

Through:

Mujeeb Ullah
Mujeeb Ullah
Advocate, High Court.
Khalid & Law Associates
46 C, Cantonment Plaza
2nd Floor, Peshawar, Sadar.
Cell No. 03018521721

(1)

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. 653/2024

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 12424

Dated 26/4/24

Mst Rani Gul SST (BPS-16) General
Presently serving at GGMS Sikandra District Mansehra.

..... APPELLANT

VERSUS

1. Director Elementary & Secondary Education
Khyber Pakhtunkhwa Female at Peshawar.
2. District Education Officer Female District Mansehra
3. Mst Izba Nawaz SST General GGMS Mansehra

..... RESPONDENTS

APPEAL UNDER SECTION 04 OF THE KHYBER
PAKHTUNKHWA, SERVICE TRIBUNAL ACT 1974,
AGAINST THE NOTIFICATION/ OFFICE ORDER
DATED 13.10.2023 WHEREBY RESPONDENT NO. 3
WAS TRANSFERRED/ ADJUSTED AT GGMS
MANSEHRA WHILE APPELLANT APPLICATION
FOR TRANSFER BEING IGNORED. AND AGAINST
THE IN ACTION AND COMMISSION OF
RESPONDENTS BY NOT CONSIDERING THE
DEPARTMENTAL APPEAL OF THE APPELLANT
WITHIN STATUTORY PERIOD.

Filed to-day

at Mansehra

PRAYER:

BY ACCEPTING THE INSTANT APPEAL, THE
IMPUGNED ORDER DATED 13.10.2023 MAY BE
DECLARED ILLEGAL AND MAY BE STRUCK
DOWN. IT IS FURTHER REQUESTED THAT THE

2)

APPELLANT MAY KINDLY BE ADJUSTED/
TRANSFERRED TO GGMS MANSEHRA IN THE
BEST INTEREST OF PUBLIC INTEREST.

ANY OTHER RELIEF, WHICH THIS HONORABLE
COURT DEEMS FIT AND APPROPRIATE, MAY
ALSO BE GRANTED TO THE APPELLANT FOR
THE ENDS OF JUSTICE.

RESPECTFULLY SHEWETH:

Brief facts of the matter which lead to the present Appeal are as under!

FACTS

1. That Appellant belongs to respectable family of the locality and was initially appointed as Drawing Master in the year 2007 and was posted at GGMS Matta District Battgram {COPY OF APPOINTMENT ORDER IS ANNEXED AS A}.
2. That Later on Appellant was transferred to GGHS Shamlai Battgram in the year 2010. After that period Appellant was promoted to SDM in the year 2016 and she was transferred to GGHS Battgram. It is important to note once again she was transferred to GGCMS Gujar KhanBatagram on 02/02/2017 and finally she was promoted and was transferred to GGMS Sikandra as SST (Gen) on on 02/02/2018 and till date is serving on the same post at District Mansehra. {COPIES OF TRANSFER AND PROMOTION ORDERS ARE ANNEXED AS B}.
3. That Appellant had come to know that one Mst Hameeda Khatoon SST (Gen) is going to be retired from services on 31/12/2023 and the post will remain vacant after her retirement, Hence the appellant filed an application to Respondent No.2 for transfer to the said School

3

(GGMS Mansehra). {COPIES OF APPLICATION SUBMITTED TO DEO FEMALE (RESPONDENT No. 2 IS ANNEXED AS C).

4. That Respondent No. 2 while favoring their blue eyed, and bulldozing the policy ignored the application of the appellant and while adjusting Respondent No. 3 being junior to the appellant on the said vacant post at GGMS Mansehra. {COPY OF IMPUGNED OFFICE ORDER DATED 13/10/2023 IS ANNEXED AS D}.
5. That being aggrieved from the Impugned order 13/10/2023 appellant preferred departmental appeal within time to Respondent No.1 which was not been responded within statutory period. {COPY OF DEPARTMENTAL APPEAL IS ANNEXED AS E}.
6. That feeling aggrieved from the inaction and omission of Respondent No. 1 & 2 by not considering the Departmental appeal of the appellant within statutory period. Appellant have no other adequate remedy available except to approach this Hon'ble Tribunal by filing appeal on the following grounds.

G R O U N D S

- A. That the Impugned Notifications/Office Orders dated 13/10/2023 of Respondents No.2, is wrong, illegal, unfounded, unconstitutional, based on nepotism and favoritism, hence, are liable to be set aside.
- B. That the appellant is mother of 4 children and is the only bread winner for his family and all are school going children who is admitted at main City. Furthermore appellant has served on the same post at hard area for more than 5 years, apart from this appellant had served out district at Batagram which is evident from transfer orders. In this

4)

state of matter Appellant was entitled to be adjusted at GGMS Mansehra against the vacant post of SST (Gen). But Respondent No. 2 ignored this aspect while ignoring article 4 of the constitution of Islamic Republic of Pakistan. Hence, the very impugned order dated: 13/10/2023 is untenable in the eye of law.

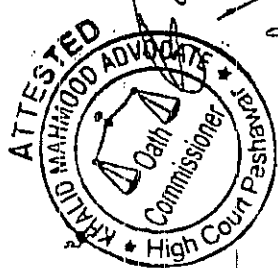
- C. That the impugned Notifications/ office orders issued by Respondents are in sheer violation of the Fundamental Rights guaranteed to the Appellant as envisaged under the Constitution of Islamic Republic of Pakistan 1973.
- D. That the whole proceedings took place on malafide, ill will intentions and just to harass the appellant, which is violation of fundamental rights guaranteed by Constitution of Islamic Republic of Pakistan 1973.
- E. That any other ground will be taken at the time of arguments with the kind permission of this Honorable Court.

In wake of above submissions, it is therefore, most humbly prayed that the instant appeal may kindly be accepted as prayed for.

[Handwritten signature]
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[Handwritten signature]

[Handwritten signature]
Appellant

Through



[Handwritten signature]
MUJEEB ULLAH
Advocate High Court.
Khalid & Law Associates
46 C, Cantonment Plaza
2nd Floor, Peshawar, Sadar.
Cell No. 03018521721

Dated: 26.04.2024

5)

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. _____/2024

Mst Rani Gul

VERSUS

Director Elementary & Secondary Education KP & Others.

AFFIDAVIT

I, Mst Rani Gul SST (BPS-16) General presently serving at GGMS Sikandra District Mansehra do hereby solemnly affirm and declare that the contents stated in my accompanying appeal are true and correct to the best of my knowledge and belief, and nothing has been concealed from this Honorable Court.

IDENTIFIED BY:

Rani Gul
DEPONENT

MUJEEB ULLAH
Advocate High Court



06

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

Appeal No-----/2024

Mst Rani Gul

VERSUS

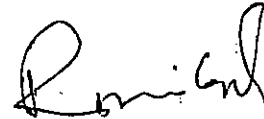
Director Elementary & Secondary Education KP & Others.

Appellant:

Mst Rani Gul SST (BPS-16) General presently serving at GGMS Sikandra District Mansehra.

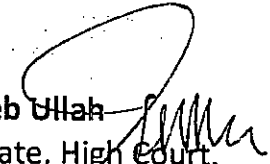
Respondents:

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Female at Peshawar
2. District Education Officer Female District Mansehra
3. Mst Izba Nawaz SST General GGMS Mansehra



Appellant

Through:



Mujeeb Ullah
Advocate, High Court.
Khalid & Law Associates
46 C, Cantonment Plaza
2nd Floor, Peshawar, Sadar.
Cell No. 03018521721

7

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

Mst Rani Gul

VERSUS

Director Elementary & Secondary Education KP & Others.

**APPLICATION FOR FIXATION OF THE INSTANT APPEAL FOR
PRELIMINARY HEARING AT PRINCIPAL SEAT.**

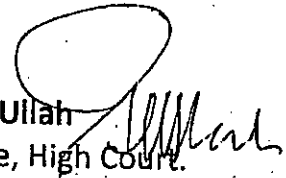
Respectfully Sheweth,

1. That the above titled appeal is filed before this Hon'ble Tribunal wherein no date of hearing is yet fixed.
2. That the Applicant/ counsel is requesting for fixation of the instant appeal before principal seat as no bench is currently available at camp court Swat
3. That most of the contesting Respondents also belong to Peshawar.
4. That there is no legal impediment on acceptance of this application.

In wake of above submissions, the instant appeal may kindly be fixed before principal seat for ends of justice.


Applicant

Through:


Mujeeb Ullah
Advocate, High Court.
Khalid & Law Associates
46 C, Cantonment Plaza
2nd Floor, Peshawar, Sadar.
Cell No. 03018521721

8

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

Mst Rani Gul

VERSUS

Director Elementary & Secondary Education KP & Others.

APPLICATION FOR CONDONATION OF DELAY

Respectfully Submitted as under,

1. That the Applicant/Appellant has filed the above titled Appeal before this Hon'ble Court in which no date of hearing has yet been fixed.
2. That the instant application may kindly be read as integral part of the main appeal.
3. That the Applicant/Appellant seeks condonation of delay (if any) inter alia on the following grounds.

GROUND

- A. That appellant daughter was suffering from chest and throat infection since 15 days and suddenly she came to know that statutory is going be lapsed soon, she suddenly called her counsel for filling appeal.
- B. That the delay on the part of the appellant is not intentional or deliberate, but due to the above stated reason. Even as an exceptional case, this Hon'ble Tribunal has ample powers to condone the delay.
- C. That in plethora of judgment the Superior courts have held that in such like matters, cases are to be decided on merit rather than technicalities.

9

D. That if the condonation is not granted the Applicant will suffer irreparable loss.

E. That in Plethora of Judgments, superior Courts, held that no limitation runs against void order.

It is, therefore, humbly prayed that in the light of above stated grounds the instant application may be graciously accepted and the delay (if any) may kindly be condoned in the interest of justice.


Applicant/Appellant

Through:


Mujeeb Ullah

Advocate, High Court.
Khalid & Law Associates
46-C, Cantonment Plaza
2nd Floor, Peshawar, Sadar.
Cell No. 03018521721

10

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

Mst Rani Gul

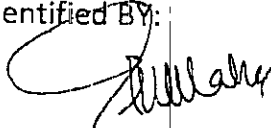
VERSUS

Director Elementary & Secondary Education KP & Others.

AFFIDAVIT

I Mst Rani Gul SST (BPS-16) General presently serving at GGMS Sikandra District Mansehra do hereby solemnly affirm and declare that the contents stated in my accompanying appeal are true and correct to the best of my knowledge and belief, and nothing has been concealed from this Honorable Court.

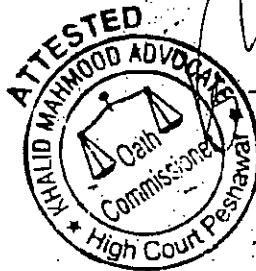
Identified BY:



MUJEEB ULLAH
Advocate High Court



DEPONENT



Mst Rani Gul
9-5-24

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (SCHOOLS & LITERACY) BATAGRAM.

APPOINTMENT

Consistent upon the approval of the District Selection Committee, Batagram the following D/O (male) have been appointed against the vacant post in BPS NO. 9, plus usual allowances in the schools against each subject to the terms and condition as given below.

S.N.	Name of Candidate	Father's Name	Domilio	Status	Place of Posting	Remarks
1	Ravi Singh	Jehan Zill	Manshera	GCMS	Malta Maldan	Against vacant Post
2	Gul Neria	Saim Muhammad	Manshera	GCMS	Amitra	Against vacant Post
3	Hajira Abbas	Ashir Rehman	Abotabad	GCMS	Milshang	Against vacant Post
4	Zahid Akhtar	M. Ramezan	Manshera	GCMS	Balagam	Against vacant Post
5	Imam Fiaz	Muhammad Fiaz	Abotabad	GCMS	Gul Muhammad Abad	Against vacant Post
6	Azra Naz	Manzoor Hussain	Manshera	GCMS	Choochan	Against vacant Post
7	Fariha Chand	Shaukat Hayat	Manshera	GCMS	Arghashori	Against vacant Post

Terms & Conditions.

1. Charge reports should be submitted to all concerned.
2. They are entitled to get all benefits as admissible under the rules in civil servant Act except pension gratuity. They should however be entitled to receive such amount contributed by them toward the contributory Provident fund along with contribution made by the provisional government for their accounts in the said fund in the prescribed manner. Provided further that in the event of death of civil servant whether before or after retirement their families should be entitled to receive the said amount if it has already not been received by the concerned.
3. Their services will be liable to termination on one month notice from either side in case of resignation without notice. For one month pay shall be forfeited to the Govt.
4. The candidates are required to produce Age and Medical certificate from the Medical Superintendent Hospital Batagram.
5. The candidates should join their posts within fifteen days of the issue of the order. The District Officer (S&L) should furnish a certificate to the effect that the candidates have joined the post or otherwise calling which for appointment will be considered as cancelled.
6. Age below 10 and above 35 years not acceptable.
7. The District Officer (S&L) is directed to verify and confirm the Donatio Certificates from the concerned Authority.
8. The District Officer (S&L) should check their original certificate/degrees before handling over charge and also get verified the documents from the concerned Board/Universities.
9. The applicants will get salaries against the sanctioned posts in the Budget.
10. The pay of the teacher may not be drawn till the verification of documents.

(Mukhtar Ahmad Swail)
 Executive District Officer
 Schools & Literacy Batagram

Dated Batagram the 30/03/2007

Copy To: The
 1. P.S. to Secondary Schools & Literacy Deptt. (W.P. Position)
 2. Director Schools & Literacy (W.P. Position)
 3. P.O. District Nazim Batagram
 4. P.O. District Co-Ordination Officer Batagram
 5. District Accounts Officer Batagram
 6. A.D.O. P.S. V.I. Local Office with the remarks to not draw the salaries till the completion of their documents verification.
 7. D.O. Office

19/A

Better Copy

**OFFICE OF THE EXECUTIVE DISTRICT OFFICER (SCHOOLS & LITERACY),
BATTAGRAM**

APPOINTMENT

Consequent upon the approval of the District Selection Committee, Battagram the following & female trained candidates are hereby appointed against the Vacant post in BPS No-9 plus usual allowances in the schools against each subject to the terms and condition as given below;

S. No.	Name of Candidate	Father Name	Domicile	S/Status	Place of Posting	Remarks
1.	Rani Gul	Jehanzeb	Mansehra	GGMS	Matta Maidan	Against Vacant Pos
2.	Gul Nasrin	Sain Muhammad	Mansehra	GGMS	Ajmira	Against Vacant Pos
3.	Nagina Abbasi	Abdul Rehman	Abbottabad	GGMS	Nillishang	Against Vacant Pos
4.	Zahida Naheed	M. Ramazan	Mansehra	GGHS	Battagram	Against Vacant Pos
5.	Irrum Faiz	M. Faiz	Abbottabad	GGMS	Gul M. Abad	Against Vacant Pos
6.	Asma Naz	Manzoor Hussain	Mansehra	GGMS	Choolan	Against Vacant Pos
7.	Farhana Chand	Shaukat Hayat	Mansehra	GGMS	Arghashori	Against Vacant Pos

TERMS & CONDITIONS

1. Charge reports should be submitted to all concerned
2. They are entitled to get all benefits under the rules in civil servant Act except pension/gratuity. They are entitled to get all benefits as admissible under the rules in civil servant Act except pension/gratuity. They should however be entitled to receive such amount contributed by them toward the contributory Provident fund along with contribution made by the provisional government to their accounts in the said fund in the prescribed manner. Provided further that in the event of death of civil servant whether before or after retirement their families should be entitled to receive the sold amount if it has already not been received by the concerned.
3. Their services will be liable to termination on one month notice from either side, In case of resignation without notice, her one month pay shall be forfeited to the Govt:
4. The candidates are required to produced Age and Health certificate from the Medical Supdt: DHQ Hospital Battagram.
5. The candidates should join their posts within fifteen days of the issue of this order, The District Officer (F)(S&L) should furnish a certificate to the effect that the candidates have joined the post or otherwise, failing which her appointment will be considered as cancelled.
6. Age below 18 and above then 35 years not acceptable.
7. The District Officer(F) S&L is directed to verify and confirm the Domicile Certificates from the concerned Authority.
8. The District Officer(F) should check their original certificates/Degrees before handing overcharge and also got verified the documents from the concerned Boards/Universities.
9. The Appointees will get salaries against the sanctioned posts in the Budget.
10. The Pay of the teacher may not be drawn till the verification of documents.

MUKHTAR AHMAD SWATI
Executive District Officer
School & Literacy Battagram

Endst No. 961-66

/F No. DO (F)/apptt:Secy: Female dated: 30.03.2007

Copy to the:

1. P/S to Secretary Schools & Literacy Deptt: NWFP Peshawar
2. Director Schools & Literacy NWFP Peshawar
3. Pa to District Nazim Battagram
4. P/A to District Co-Ordination Officer Battagram
5. District Accounts officer


DISTRICT OFFICER FEMALE
(SCHOOLS & LITERACY), BATTAGRAM

DISTRICT EDUCATION OFFICER FEMALE BATTAGRAM

TRANSFER ORDER

The following Drawing Masters are hereby adjusted as noted against their names on their own papers and 30's in the interest of public service with immediate effect.

Sr.	Name of teacher	From	To	Remarks
1	Mst. Ram Gul, S.M.I	GGHS Shinnai	GGHS Battagram	Vice S No 2
2	Mst. Ram Rani, D.M	GGHS Battagram	GGHS Nurta Madan	As per Post

- Note: 1. Change reports should be sent to all concerned.
 2. No Pr/OA is allowed.

sh
 DISTRICT EDUCATION OFFICER FEMALE
 BATTAGRAM

Endst. No. 979-37 / F.No.2 / Vol-I Posting transfer

Date: 24/3 2016

Copy forwarded for information to:

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Feshwar
2. District Nazim Battagram
3. District Accounts Officer Battagram
4. Headmistress GGHS Battagram & Shinnai
5. S&AO Local Office
6. Teacher concerned.

[Signature]
 DISTRICT EDUCATION OFFICER FEMALE
 BATTAGRAM

[Signature]

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) BATTAGRAM**TRANSFER ORDER**

The following Drawing Mistress are hereby adjusted as noted against their names on their own pay and BPS in the interest of public service with immediate effect.

S#	Name of Teacher	From	To	Remarks
1.	Mst. Rani Gul, SDM.	GGHS Shamlai	GGHS Battagram	Vice S No.2
2.	Mst. Iram Rani, DM	GGHS Battagram	GGMS Matta Mardan	Vice SW.DM

Note.

1. Charge reports should be sent to all concerned.
2. No TDA is allowed.

**DISTRICT EDUCATION OFFICER (FEMALE)
BATTAGRAM**

Endst. No 372/77

Dated 01/3/2016

Copy forwarded for information to:

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Nazim Battagram
3. District Accounts Officer Battagram
4. Headmistress GGHS Battagram & Shamali
5. B&AO Local Office
6. Teacher concerned.

**DISTRICT EDUCATION OFFICER (FEMALE)
BATTAGRAM**

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14/A

**DIRECTOR ELEMENTARY & SECONDARY
EDUCATION KHYBER PAKHTUNKHWA PESHAWAR**

TRANSFER ORDER

Mst. Rani Gul SST (G) BPS-16 GGMS Kas Hajar Kham Director Battagram, is hereby transferred in her own pay and BPS to GGMS, Sikandar District Mansehra, in the interest of public service against the vacant SST (General Post).

Note:-

1. Charge report should be submitted to all concerned.
2. No LA DA is allowed.
3. The District Education Officer(F) concerned is directed to check their original service documents before making payment of salary.

**Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar**

Endst No. 577/A-17/SST/F Transfer case Hazara Division/2018

Dated Peshawar the 2/2/2018

Copy of the above is forwarded to the:-

1. District Education Officer(Female) Battagram and Mansehra
2. District Accounts Officer, Battagram and Mansehra
3. Principals/Headmistress concerned
4. Teacher concerned
5. PA to Director (E&SE) Local Office,
6. Master file

**Deputy Director Establishment(F)
(E&SE) Khyber Pakhtunkhwa**



18/Nov/18

Deputy Director Establishment (B&ST) (Kyber Pakhtunkhwa)

[Handwritten signature]
20/11/18

5- P.A. to Director (B&ST) Local Office
4- Enclosed concerned

- 3- Principals/Headmasters concerned
- 2- District Accounts Officer, Battagram and Munschra
- 1- District Education Officer (Female) Battagram and Munschra

Copy of the above is forwarded to the:-

Dated Peshawar the 2/11/2018

A-17/SS/F/Transfer cases/Hazara Division/2018

Encls. No. 577-5

Director
Elementary & Secondary Education
Kyber Pakhtunkhwa Peshawar

payment of salary.

- 3- The District Education Officer(s) concerned is directed to check their original service documents before making
- 2- No I.A.D.s allowed
- 1- Charge report should be submitted to all concerned.

Note:-

Mst Rani Gul SST (G) BPS-16 Local M.S. Kam Elnu Kam Battagram, is hereby transferred on her own pay and HPS to (G) BPS, Munschra District Munschra, in the interest of public service against the vacant SST (General) post.

DIRECTOR GENERAL OF TEACHERS AND EDUCATION OFFICERS & ASSISTANTS
OFFICE OF THE DIRECTOR GENERAL OF TEACHERS AND EDUCATION OFFICERS & ASSISTANTS
PESHAWAR





Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

PT No: 091-9210389, 9210938,
 9210437, 9210967, 9210168
 Fax: 091-9210936, 0300-33857
 E-mail: rafiq_kk851@yahoo.com

Notification

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification NoSO(D&A)/1-10/E&SE/2012 dated 11.07.2012 and Finance Department Endorsement No SO(PR)/FD/10-12(E)/2010 dated 16.07.2012 the following DMS B-15 are hereby promoted to the post of Senior DM BPS 16 (Rs. 10000-800-3,1000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and conditions given below with immediate effect and further they will be posted in the Government Higher Secondary /High Schools by the District Education Officers concerned against the newly upgraded Senior DM BPS-16 posts:-

Total No. of DM (B) Posts duly verified by the DAO	24
1/3 share of Senior DM Posts	8
Share of promotion 100%	8
Promoted to the post of Senior DM B-16.	8

S. No	S/L No	Name of Teacher	Place of Posting	Date of Birth	Remarks
1	2	Farhana Chand	GGMS Matta Medan	03/12/1985	Services placed at the disposal of DEO (F) Battagram for further posting.
2	3	Gul Nazreen	GGHS Ajmera	15/03/1975	---Do---
3	4	Asma Naz	GGMS Chohan	12/04/1980	---Do---
4	5	Rani Gul	GGHS Shingli Pageen	01/03/1981	---Do---
5	7	Shahida Parveen	GGMS Battamori	01/04/1975	---Do---
6	8	Sahira Sullana	GGMS Raza Banda	02/04/1976	---Do---
7	9	Fozia Nuheed	GGMS Tikri Khawari	06/07/1981	---Do---
8	10	Iram Rani	GGMS Arghashori	01/01/1984	---Do---

Terms and conditions:-

- They would be on probation for a period of one year extendable for another one year.
- They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- Their services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be proceeded under the rules framed from time to time.
- Charge report should be submitted to all concerned.
- Their Inter-Se seniority on lower post will remain intact.
- No TA/DA is allowed for joining his duty.
- They will give an undertaking to be recorded in their service book to the effect that if any extra payment is made to him in light this order will be recovered and if he is wrong, promoted he will be reversed.

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Directorate of Elementary and Secondary Education

Khyber Pakhtunkhwa Peshawar

PH No. 091-9210389, 9210938,

910437,9210957, 9210.468

Fax 091-9210936,0800-33857

E-mail rafiq_kk851@yahoo.com

Notification

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education-Notification No SO(B&A)/1-18/E&S8/2012 doled 11.07-2012 and Finance Department Endorsement No SO(FR)/FD/10-a2(B)/2010 dated 16.07.2012, the following DAMS B-15 are hereby promoted to the post of Senior DM BPS 16 (10000-800-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and further they will be posted in the Government Higher Secondary/High Schools by the District Education Officers concerned against the newly upgraded Senior DM BPS-16 posts:-

Total No. of DM (F) Posts duly verified by the DAG	24
1/3 share of Senior DM Posts	8
Share of promotion 100%	8
Promoted to the post of senior DM B-16.	8

S. No	S.L No	Name of Teacher	Place of Posting	Date of Birth	Remarks
1.	2	Farhana Chand	GGMS Matla Medan	03/03/1985	Services placed at the disposal of DEO (F) Battagram for further posting Do
2.	3	Gul Nasreen	GGMS Ajmera	15/03/1975	Do
3.	4	Asma No	GGMS Chahan	12/04/1980	Do
4.	5	Rani Gul	GGMS Shingil Payeen	01/03/1981	Do
5.	7	Shahida Parveen	GGMS Battamari	01/01/1975	Do
6.	8	Sabira	GGMS Kuza Banda	02/04/1976	Do
7.	9	Fozia Naheed	GGHS Tikri Kharari	06/07/1981	Do
8.	10	Iram Rni	GGMS Arghashori	01/01/1984	Do

Terms and conditions:-

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





Directorate of Elementary and Secondary Education
बिहार **प्राथमिक-मध्यम शिक्षा**

PO Box 191, Patna, Bihar, India
 Phone: 055-2331000, 2331001, 2331002
 Fax: 055-2331003, 2331004, 2331005
 E-mail: depe@nic.gov.in

Notification

For promotion of the vacancies of the Department of Elementary and Secondary Education, Bihar, under the control of Bihar Education Department and Secondary Education, Bihar, vide G.O. No. 144/SSD/2005 dated 10.07.2005, the following of 15 C.P., SDMs/DNs, 15 V.C.A.s, 15 P.T. Senior Officers, Quots, P.S.Ts/SSTs/DNS and Junior promoted to the post of P.T. (General), S.T. (Ply-Maths), S.T. (General) noted against each officers (P.T. posts are 4.00) plus usual allowances as admissible under the rules on similar basis under the existing rules of the Provincial Government, on the terms and conditions given below, with immediate effect and further they will be posted by the District Education Officers concerned.

A. SST (General)

1. PROMOTION OF SDMs/DNs to SST (General) BPS-16

Total No. of SST (General) (F) Posts vacant Posts	01
25% share initial recruitment	02.50
75% share for Promotion	00.50
20% Share of promotion of SDMs/DNs	00.50
Posts available for promotion	00
Promoted through this order	01

S.No.	S.T. No.	Name of Officer & Present Place of Posting	Date of Birth	Name of Appointing Authority	Qualification	Remarks
1	01	Barhama Chand SDM G.M.S Balsarane	01.12.1965	09.03.2004	BA/B.Ed	For promotion of 1 post with name
2	02	Barhama Chand SDM G.M.S Balsarane	01.01.1968	24.01.2004	MA/B.Ed	For promotion of 1 post with name

Number of of SDMs/DNs used for promotion = 01

Terms and conditions:-

- The said promotion for a period of one year extendable for another one year.
- They will be governed by all rules and regulations in force from time to time by the Govt.
- Their services may be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they will be governed under the rules framed from time to time.
- Change report should be submitted as all concerned.

16/A

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DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION

Khyber Pakhtunkhwa, Peshawar

Ph No. 091021038, 9810938

NOTIFICATION

Consequent upon the accommodations of the Department Promotion Committee and the pursuance of the Government Khyber Pakhtunkhwa, Elementary & Secondary Education notification No. RSO(PE)/4/5 /SSRC / Afectma 2013/cadre dated July. 2014 the following SCTs/CTs, SDMs/ DMs, SAS/ATs, STTs/IT senior Qarias/Qaras, PSHTs/SPSTs/ PSTs are hereby promoted to the post of SST General noted against each BPS-16 allowances as admissible under the rules on enquiry that's under the existing policy of the Provisional Government on the terms and condition given below with immediate effect and further they with be posted by the District Education Officer concerned.

A. SST (GENERAL)

Promotion of SDM/DM PO SST General BPS-16

Total No. of SST General (F) Posts Vacant Posts	01
25% Share initial recruitment	0.25
75% share for promotion	0.33
20% share of promotion of SDM/DM	0.13
Posts available for promotion	01
Promoted through this order	01

S. No.	SI No.	Namely Official & present place of posting	Date of Birth	Date of Appoints as Regular	Qualification	Remarks
1.	01	Farhana Chand SDM GGHS Battagram	03.12.1085	09.03.2013	BA/B.Ed	Her promotion hereby withdrawn
2.	03	Rani Gul SPM GGHS Battagram	01.03.1981	04.12.2013	MA/B.Ed	Services placed the disposal of DF (F) Battagram f further postir against SST post

Number of SDM/DM cleared for promotion=01

1. They would be an probation for a period of one year extendable for another one year
2. They will be governed by such rules and regulation as may be issued from there to hereby the Govt.
3. Their services can be terminated of any time. In case their performance is found unsatisfactory during probationary period. In case of misconduct they shall be prescribe under the rules framed from time to time.
4. Charge report should be submitted to all concerned.



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Cont. Page 2

Encl: No. 1574/Date: 28/03/2013

Muhammad Saeed Khan
District Education Officer
(Female) Baharain

- Note:
1. Charge Reports should be submitted to all concerned.
 2. All Drawing & Disbursing Officer are directed to make necessary entries in their service books.
 3. The Heads of Schools should check/verify their documents.

Sr. No	Name of Teacher/School	Name of School	Remarks
1	Fahim Ghani GMS, Malka Madan	GMS Baharain	(B-16) Regular vacant Post
2	Asma Piaz GMS Choochan	GMS Baharain	(B-16) V.7
3	Toni Gul GMS Shilgh Payero	GMS Shantal	(B-16) V.6
4	Shahida Farveen GMS Baharain	GMS Gul Maulid Abad	(B-16) V.8
5	Sahib Sultan GMS Kaza Banda	GMS Nishang	(B-16) V.9
6	Sajjan Zaman GMS Shantal	GMS Malka Madan	(B-15) V.1
7	Fozia Saad GMS Baharain	GMS Choochan	(B-15) V.2
8	Nabeer Nawab GMS Gul Maulid Abad	GMS Baharain	(B-15) V.4
9	Muhammad Aslam GMS Nishang	GMS Baharain	(B-15) V.10
10	Muhammad Aslam GMS Gul Maulid	Kaza Banda	(B-15) V.5
11	Floorn S. Adhine GMS Baharain	GMS Baharain	(B-15) Vacant Post

ADJUSTMENT ORDER

In pursuance of Government of Jharkhand, Department of Higher, Secondary and Secondary Education, Resolution bearing No. 3386-2/11 (Promotion) dt. 27/02/2013, the following slabs 11-5, 16 and 15 are hereby replaced with each other and posted in the schools shown against their names with immediate effect. The teachers upgraded in higher/high schools will remain in their respective schools.

OFFICER OF THE DISTRICT
MIDDLE SCHOOL OFFICER (FEMALE)
BAHARAIN

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(17/A)

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**OFFICE OF THE DISTRICT
EDUCATION OFFICER (FEMALE)
BATTAGRAM**

ADJUSTMENT ORDER

In pursuance of Government of Khyber Pakhtunkhwa, Elementary and Secondary Education Department, notification bearing No. 33807/Item/Promotion (F) senior DM B-16, dated Peshawar the 21.02.2013 the following SDMs BPS-16 and DMS BPS-15 are hereby replaced with each other and posted in the schools shown against their names with immediate effect. The teachers upgrated in Higher/High Schools will remain in their respective schools.

Sr. No.	Name of Teacher/School	Name of School where adjusted	Remarks
1.	Farhan Chand GGMS Matta Maidan	GGHS Battagram	(B-16) Against Vacant Post
2.	Asma Naz GGMS Chohan	GGHS Banjar	(B-16) V.7
3.	Rani Gul GMMS Shingli Payeeen	GGHS Shamlai	(B-16) V.6
4.	Shahida Parveen GGMS Battamori	GGHS Gul Muhd Abad	(B-16) V.8
5.	Sabira Sultan GGMS Kuza Banda	GGHS Nelishang	(B-16) V.9
6.	Sanam Zaman GGHS Kuza Shamlai	GGMS Mattan Maidan	(B-15) V.1
7.	Fozia Saeed GGHS Banjar	GGMS Chohan	(B-15) V.2
8.	Nasreen Nawab GGHS Gul Mujahid Abad	GGMS Battamori	(B-15) V.4
9.	Nazash Hameed GGHS Nelishang	GGMS Bai Kheal	(B-15) V.10
10.	Nighat Yasmeen GGMS Bhai Kheal	Kuza Banda	(B-15) V.5
11.	Noorjin Siddiqui GGMS Bandi Roopirani	GGMS Dagrar Mer	(B-15) Vacant Post

Note:

1. Charge Reports should be submitted to all concerned
2. All Drawing & Disbursing Officer are directed to make necessary entries in their service books.
3. The Heads of Schools should Check/verify their documents.

**Muhammad Saeed Khan
District Education Officer
(Female) Battagram**

Endst: No. 3139-4/ dated: 08.03.2013



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE)
BATAGRAM

JUSTMENT ORDER

In pursuance to the Notification of the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar issued Deputy Director Establishment vide Encl. No. 5107/Ed. No. 2 Promotion, SST, B-16 Dated 18.01.2017, wherein the promotion of Farhana Chand, GGCMS Kass Gujar Khan from the post of SDM to SST (G) has been drawn and Mst. Rani Gul, SDM GGIS Battagram has been ordered against the post of SST and referred in the schools mentioned against their names with immediate effect in the larger interest.

SN #	Name of Teacher/ Designation/School	Place of posting etc	Remarks
01	Farhana Chand, SDM GGCMS Kass Gujar Khan	GGIS Battagram	Vice S.No.2
02	Rani Gul, SST (G), GGIS Battagram	GGCMS Kass Gujar Khan	Vice S.No.1

Conditions:

will be on probation for a period of one year.
will be governed by such rules and regulations as issued from time to time by the Govt.
services can be terminated at any time, in case her performance is found unsatisfactory during
probationary period. In case of misconduct she will be proceeded under the rules.
inter-Se-Seniority on lower post will remain intact.
will give an undertaking to be recorded in her service book to the effect that if any over payment
made to her in the light of this order will be recovered and if she is wrongly promoted she will be
resigned.
On handing over charge once again her documents may be checked and if she has not the required
qualifications as per rules, she may not be handed over charge of the post.
Necessary entry shall be recorded in their original service books.
Final report shall be submitted immediately to all concerned.
TADA is allowed.

ZUBAIDA KHATTAK
DISTRICT EDUCATION OFFICER (F)
BATAGRAM

No. 340-64 /PF Rani Gul

Dated 27/01/2017

Copy forwarded to:

- Director E&SED, Khyber Pakhtunkhwa Peshawar
- District Accounts Officer, Battagram
- Sub-Divisional Education Officer (F), Battagram
- Headmistress, GGIS Battagram
- Teachers concerned

DISTRICT EDUCATION OFFICER (F)
BATAGRAM

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18/A

**OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE)
BATTAGRAM**

ADJUSTMENT ORDER

In pursuance to the Notification of the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar issued Deputy Director Established vide Endit No. 3706-10/File No: 2/ Promotion SST B-16 Dated 18.01.2017 wherein the Promotion of Mst: Farhaba Chand, GGCMS Kass Gujar Khan from the post of SDM to SST (G) has been withdrawn and Mst. Rani Gul, SDM GGHS Battagram has been ordered against the post of 551 (G) and adjusted in the schools mentioned against their names with immediate effect in the larger public interest.

S.#	SN#	Name of Teacher/ Designation/school	Place of Posting as	Remarks
3.	01	Farhana Chandm SDM	GGHS Battagram	Vice S No.2
4.	03	Rani Gul, SST (G) GGHS Battagram	GGCMS Kass Gujar Khan	Vice S No.1

TERMS & CONDITIONS:

1. She will be on probation for a period of one year.
2. She will be governed by such rules and regulations as issued from time to time by the Govt.
3. Her services can be terminated at any time, in case her performance is found unsatisfactory during probationary period. In case of misconduct, she will be proceeded under the rules.
4. Their inter Se Seniority on lower post will remain intact.
5. She will give an undertaking to be recorded in her service book to the effect that if any over payment is made to her in the light of this order will be recovered and if she is wrongly promoted the will be reversed.
6. Before handing over charge once again her documents may be checked and if she has not the required, relevant qualifications as per rules, she may not be handed over charge of the post.
7. Necessary entry shall be recorded in their original service books.
8. Charge report shall be submitted immediately to all concerned.
9. No: TA/DA is allowed.

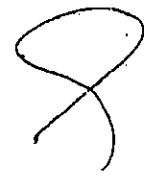
**ZUBAIDA KHATTAK
DISTRICT EDUCATION OFFICER.(F)
BATTAGRAM**

Endst: No. 340-44 PF Rani Gul

Dated 27/04/2017

Copy forwarded to:

1. Director E&SED Khyber Pakhtunkhwa Peshawar
2. District Accounts Officer, Battagram.
3. Sub Divisional Education Officer (F) Battagram
4. Headmistress GGIS Battagram
5. Teacher concerned.



**DISTRICT EDUCATION OFFICER
BATTAGRAM**

18/B

Dated: September 28, 2023

The Secretary to Govt. of Khyber Pakhtunkhwa,
Elementary and Secondary Education.

July 21/10/23
Ayaz Bala
After promotion
adjust her

1: Request for Transfer from GGMS Sakindra Mansehra to GGMS Mansehra City.

Sir, *Assalam-o-rahikum*

It is stated with profound respect that the undersigned is working as SST(G) at GGMS Sakindra, Mansehra since 2017 and have completed more than 06 years of rigorous place on this distant hard station. The undersigned living in Mansehra City and the children is studying in schools here. The undersigned is facing a lot of problems due to distant job place. The children under eighteen and their education are also suffering to a great extent. Your kind self well know that due inflation expenses have been increased to a higher level and it is very difficult to manage the daily expenses of travelling, food etc. These problems create hinder the professional performances and cause of mental tension and anxiety. As children eighteen need great care and special attention which is impossible without having a nearest duty station. The undersigned husband job is also in Islamabad and there is no other adult in the family to take care of the children.

It is, therefore, requested that keeping in view the above critical situation the undersigned please be adjusted in GGMS Mansehra City and enable to perform duty with ease and comfort.

I will be very grateful for this act of kindness.

Best Regards,

Rani Gul
(Rani Gul)
SST(G), GGMS, Sakindara,
District, Mansehra.

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DISTRICT EDUCATION OFFICER
(FEMALE) MANSHERA

- 1. The District Accounts Officer Manshera
- 2. The District Monitoring Officer Manshera
- 3. The Headmistress GMS Manshera
- 4. Office record

Copy of the above is forwarded to:-

Enclst: No 1777 Dated 13/11/2023

(REHANA YASMIN)
DISTRICT EDUCATION OFFICER
(FEMALE) MANSHERA

Note: Charge report should be submitted to all concerned.
 No TA/DA is allowed.
 Post of the school officer pay and scale in the interest of public
 service.
 Manshera is hereby adjusted to GMS Manshera against vacant
 post of 17023. Mr. Iqbal Nawaz SSI (Gen) (Secy) DEO (I)
 Manshera Khairpur SSI (Gen) GMS Manshera, Manshera on
 17023. Mr. Iqbal Nawaz SSI (Gen) (Secy) DEO (I)

19/A

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DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

ADJUSTMENT ORDER

Consequent upon the retirement of Mst, Hameeda Khatoon SST (Gen) GGMS Mansehra, is retired on 31/12/2023. Mst: Izba Nawaz SST (Gen) ADEO (Secondary) DEO (F) Mansehra is hereby adjusted to GGMS Mansehra against vacant post) of the school on her own pay and scale in the interest of public service.

Note:

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

(REHANA YASMIN)
DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA

Endorsit: No 17778 881 Dated: 13/10/2023

Copy of the above is forwarded to;

1. The District Accounts Officer Mansehra
2. The District Monitoring officer Mansehra
3. The Headmistress GGMS Mansehra.
4. Office record

DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA

700

1/12/23

The Director Elementary & Secondary Education,
Elementary & Secondary Education Department
Govt. of Khyber Pakhtunkhwa, Peshawar.

Subject: Appeal against the adjust order of Miss Izbah SST(G) on the Position of GGMS Mansehra/IV
Midia SST(G) is going to retire on 31/12/23.

Respected Madam,

It is stated with profound respect that I am working as SST(G) at GGMS Sakindara Mansehra since we are facing a lot of problem due to distant separate job places. Our children under eighteen are in school and also suffering to a great extent. As your kind self well know that due inflation expenses have been increased to a higher level and it is very difficult to manage the expenses of separate residences. These problems also hinder our professional performances and cause of mental tension. Firstly, I have submitted application to DEO(F) Mansehra many times that my adjustment order be made against the post to be vacant on 31/12/23 as mentioned in the subject line, but the adjustment for Miss Izbah, keeping in view any criteria or merit. Secondly, I am senior to her and I have served in this hard station for more than 05 years. Miss Izbah is working as an A grade DEO office for less than two years. She is already working in city. Thirdly, she is single and has no kids and can serve easily in remote station.

It is therefore requested that this adjustment order may please be cancelled and a committee may be constituted to make adjustment on merit basis and that no one feel that her right is used and discrimination has been done on personal likes and dislikes.

I am very grateful for this act of kindness.

Yours faithfully,

31/12/23

D/C



GGMS Sakindara Mansehra

Khyber Pakhtunkhwa

20/A

To,

The Director Elementary & Secondary Education,
Elementary & Secondary Education Department
Govt. of Khyber Pakhtunkhwa, Peshawar.

Subject: Appeal against the adjust order of Miss Izbah SST(G) on the
Position of GGMS Mansehra/Hamida SST(G) is going to retire
on 31/12/23.

Respected Madam,

It is stated with profound respect that I am working as SST(G) at GGMS Sakindara Mansehra since 2 year are facing a lot of problem due to distant separate job places. Our children under eighteen and education and also suffering to a great extent. As your kind self well know that due inflation expletive been increased to a higher level and it is very difficult to manage the expenses of separate residences. These problems also hinder our professional performances and cause of mental tension anxiety. I have submitted application to DEO(F) Mansehra many times that my adjustment orders please made against the post to be vacant on 31/12/23 as mentioned in the subject line, but the issued adjustment for Miss Izbah, keeping in view any criteria or merit. Secondly, I am senior to respect that I have served in this hard station for more than 05 years. Miss Izbah is working as an ASI as female EDO office for less than two years. She is already working in city. Thirdly, she is single having no kids and can serve easily in remote station.

It is therefore requested that this adjustment order may please be cancelled and a committee may lease be constituted to make adjustment on merit basis and that no one feel that her right is usurping and any discrimination has been done on personal likes and dislikes.

It will be very grateful for this act of kindness.

Best Regards.

RANI GUL

GGMS Sakindara Mansehra
Govt. of Khyber Pakhtunkhwa,

