


# FORM OF ORDER SHEET

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

**Appeal No.** \_\_\_\_\_

**1947/2024**

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	15/10/2024	<p>The appeal of Mst. Natasha Habib presented today by Mr. Khaled Rehman Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 21.10.2024. Parcha Peshi given to the counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 19/17/2024

Natasha Habib..... Appellant

Versus

The Govt. of KPK and others..... Respondents

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Through

Appellant

  
Khaled Rahman

Advocate,

Supreme Court of Pakistan

3-D, Haroon Mansion

Khyber Bazar, Peshawar

Off: Tel: 091-2592458

Dated: 12/10/2024

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1947/2024

**Natasha Habib**

Ex-Head Mistress, wife of Liaqat Ali,

R/o Darmangi, Warsak Road, House No.11,

Mohallah Northern Villas, District Peshawar.....**Appellant**

Versus

1. **The Govt. of Khyber Pakhtunkhwa**  
through Chief Secretary,  
Civil Secretariat, Peshawar.
2. **The Secretary**  
to Govt. of Khyber Pakhtunkhwa  
Elementary and Secondary Education, Department  
Civil Secretariat, Peshawar.
3. **The Secretary**  
to Govt. of Khyber Pakhtunkhwa  
Establishment and Administrative Department,  
Civil Secretariat, Peshawar ..... **Respondents**

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SERVICE APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNALS ACT, 1974 AGAINST THE IMPUGNED NOTIFICATION DATED 19.02.2024 WHEREBY APPELLANT WAS NOT PROMOTED TO THE NEXT HIGHER GRADE I.E. BPS-18 AGAINST WHICH SHE FILED DEPARTMENTAL APPEAL BEFORE THE COMPETENT AUTHORITY ON 07.03.2024 BUT THE SAME WAS UNLAWFULLY REGRETTEED VIDE LETTER DATED 23.09.2024.

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**PRAYER:**

On acceptance of the instant appeal, the impugned Notification dated 19.02.2024 & impugned appellate order vide letter dated 23.09.2024 may kindly be set aside/modified by directing the Respondents to allow notional promotion to

the appellant to the next higher grade i.e. BPS-18 with effect from 19.02.2024 the date when other colleagues of appellant including juniors to her were promoted to BPS-18 with all back benefits including fixation of pensionary benefits in the promoted post.

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Respectfully Sheweth,

Facts giving rise to the present appeal are as under:-

1. That appellant was initially appointed in the Elementary and Secondary Education Department way back in the year 1995. Since inception she performed her duties to the entire satisfaction of her high-ups with full zeal and zest and was lastly promoted to the post of Head Mistress BPS-17 on 10.03.2011. Appellant had more than 30 years impeccable service at her credit and stood retired on 18.02.2024.
2. That as per the Seniority List (*Annex:-A*) as stood on 05.01.2024 of Female Officers (BPS-17) (Teaching Cadre) of the Elementary & Secondary Education Department the appellant is at Serial No.83 above the name of Munazzah Rafiq and below the name of Mst. Abida Ameen. As numerous vacancies in the Promotion quota were available for which not only the appellant was eligible/qualified but she also fell within the promotion zone and thus was hopeful of her promotion to the next higher grade.
3. That the promotion cases of the appellant and other officers were forwarded to the Provincial Selection Board for promotion to the next higher grade and a meeting of the Selection Board was held in the month of September, 2023 whereby the female officers (BPS-17) of the E&SE Department were recommended for promotion. In view of her eligibility and seniority, the appellant was hopeful that she had also been recommended by the PSB for promotion to the next higher grade and was thus waiting for her promotion Notification.
4. That the date of retirement of the appellant was 18.02.2024 but until her retirement, Notification of promotion was not issued unfortunately on the

- following day of the retirement of the appellant, the impugned Notification dated 19.02.2024 (*Annex:-B*) was issued whereby as many as 206 female officers (BPS-17) including junior to the appellant of Elementary & Secondary Education Department were promoted to the next higher grade i.e. BPS-18 while the appellant being eligible, senior was unlawfully ignored without any reasons communicated to her.
5. **That** appellant initially submitted an application to the Director E&SE on 20.02.2024 (*Annex:-C*) which was followed by a Departmental Appeal on 07.03.2024 (*Annex:-D*) to Respondent No.2 which was forwarded to Respondent No.4 for necessary action vide letter dated 08.03.2024 (*Annex:-E*). Finally, the issue was referred to Respondent No.3 for necessary guidance.
  6. **That** Respondent No.3 i.e. Establishment Department vide letter dated 23.09.2024 (*Annex:-F*) informed the E&SE Department that the appeal of the appellant was not covered under the KP promotion Policy, 2009. Thus the E&SE communicated the letter *ibid* to the appellant that her appeal had been regretted.
  7. **That** now appellant being aggrieved of both the impugned Notification and impugned appellate order, files this appeal *inter-alia* on the following grounds:-

**Grounds:**

- A. **That** Respondents have not treated appellant in accordance with law, rules and policy on subject and acted in violation of Article 4 of the Constitution of Islamic Republic of Pakistan, 1973 and unlawfully issued the impugned Notification and regretting the Departmental Appeal of the appellant, which is unjust, unfair and hence not sustainable in the eye of law
- B. **That** well before the retirement of the appellant, vacancies did exist and the appellant was eligible and fit for promotion but she was unlawfully not considered for promotion due to reasons known to the Respondents. It is well settled law that no one should suffer due to the inaction on the part of

the public functionaries.

- C. That under Section-9(1) of the Khyber Pakhtunkhwa Civil Servants Act, 1973: "*A civil servant possessing such minimum qualification as may be prescribed shall be eligible for promotion to a higher post for the time being reserved under the rule for departmental promotion in the service or cadre to which he belongs.*" Similarly, Rule-7(3) of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989 provides: "*Persons possessing such qualifications and fulfilling such conditions as laid down for the purpose of promotion are transferred to a post shall be considered by the Departmental Promotion Committee or Provincial Selection Board for promotion or transfer as the case may be.*" Keeping in view the above provisions, the appellant was entitled for promotion but was unlawfully deprived of it in violation of the law.
- D. That appellant has served the Department dedicatedly for a period of more than 29 years and by dint of her long spotless service, she was entitled for promotion to the next higher grade but was unlawfully deprived of it in violation of the law which has resulted in serious miscarriage of justice.
- E. That the appellant was considered for promotion by the Provincial Selection Board at the time when she was very much in the service but the promotion Notification was unduly delayed and in the meanwhile the appellant stood retired on attaining the age of superannuation. By now it has become a settled legal principle enunciated by the superior fora that mere retirement cannot deprive a civil servant of right of promotion if he or she was deprived of it during the currency of service.
- F. That appellant would like to offer some other grounds during the course of arguments.

It is, therefore, humbly prayed that the instant appeal may graciously be accepted as prayed for above.

Any other relief as deemed appropriate in the circumstances of case not specifically asked for, may also be granted to appellant.

*[Handwritten signature]*

Through

Appellant

*[Handwritten signature]*  
Khaled Rahman,  
ASC

&

*[Handwritten signature]*  
Muhammad Ghazanfar Ali  
Advocate, High Court

Dated: 12/10/2024

Affidavit

I, Natasha Habib R/o Darmangi, Warsak Road, House No.11, Mohallah Northern Villas, District Peshawar, do hereby solemnly affirm and declare on oath that the contents of this Service Appeal are true and correct to the best of my knowledge, and nothing has been concealed from this Hon'ble Tribunal.

*[Handwritten signature]*

Deponent

*[Handwritten signature]*  
12/10/24

**TENTATIVE SENIORITY LIST OF FEMALE OFFICERS B-17 TEACHING CADRE OF ELEMENTARY & SECONDARY EDUCATION DEPARTMENT STOOD ON 05-01-2024**


S#	Name of Officer with academic qualification	Qualification	Date of Birth	Domicile	Date of 1st Appointment in Edu; Deptt	Regular appointment/ Promotion to the present post.			REMARKS
						Regular Date	Grade	Method of Recruitment	
1	Mst Aisha Jabeen D/o Muhammad Yahya SS (Economics) GGHSS Umarzai Charsadda	MSc B.Ed	14-03-75	Peshawar	12-01-2008	12-01-2008	17	Direct Selectee	No. SO (S)/3-2/2007/SS F
2	Mst Sultana Jehan D/O Fazl e Mabood SS GGHSS Harichand Charsadda	MA B.Ed	03-12-76	Peshawar	12-01-2008	12-01-2008	17	Direct Selectee	No. SO (S)/3-2/2007/SS F
3	Farah Deeba HM GGHS Hakim Bharat Bannu	MSC M.Ed	01-12-66	Bannu	30-01-1990	14-11-2017	17	By promotion	SO (PE)/2-6/DPC meeting (03.10.2017)
4	Sabiha Naz D/O Shamsur Rehman Instructor RITE Swabi	mSc med	05-01-73	Swabi	11-11-1999	08-10-2010	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2009/10/11/ Recruitment SS F
5	Mst. Sumaira Mehdi D/O Aksay Mehdi SS GGHSS Phy: GGHSS Kalu Khan Swabi	MA Med	05-11-77	D.I.Khan	09-12-2009	09-12-2009	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2009/10/11/ Recruitment SS F
6	Farzana nayyer D/O M sabir HM GGHS Mir pur haripur	MA MED	10-02-68	Haripur	07-07-2001	10-03-2011	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2011/Headmistress
7	Ambreen Anjum D/O Sajid Ali shah HM GGHS Qasab khana peshawar	MAMED	18-6-1971	Peshawar	18-12-1999	10-03-2011	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2011/Headmistress
8	Zeenat Yasmeen D/O Muslim Khan HM GGHS Bashir Abad Peshawar	MA MED	18-04-74	Peshawar	28-03-1995	10-03-2011	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2011/Headmistress
9	Shagufta Anjum D/O Mohammad Masood HM GGHS city Railway station Peshawar	MA MED	04-03-68	Mansehra	21/9/1999	10-03-2011	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2011/Headmistress
10	Mst. Bushra D/O Hakim Khan SS Stat GGHSS Barawal Banda Dir Upper	MSc MED	04-11-78	Mansehra	09-12-2009	09-12-2009	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2009/10/11/ Recruitment SS F
11	Saeeda Begum D/O Hazrat Ali SS (Pak Study) GGHSS Ghallanai Mohmand	MA MED	1.4.1983	Mohmand Agency	25.7.2006	15-09-2010	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2009/10/11/ Recruitment SS F

**ATTACHED**



S#	Name of Officer with academic qualification	Qualification	Date of Birth	Domicile	Date of 1st Appointment In Edu; Deptt	Regular appointment/ Promotion to the present post.			REMARKS
						Regular Date	Grade	Method of Recruitment	
78	Nusrat Mehreen D/O Muhammad Nawaz Khan SS (H/Chvics) GGHSS S-K-Bala Bannu	MA MEd	28-09-81	Bannu	03-10-2005	08-10-2010	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2009/10/11/ Recruitment SS F
79	Mst. Misbah Afzal D/O Afzal Baig SS Econ GGHSS Topi Swabi	Msc B.Ed	09-12-81	Haripur	09-12-2009	09-12-2009	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2009/10/11/ Recruitment SS F
80	Mst. Saima Begum D/O Mohibullah SS Pak Study GGHSS Nishtarabad Peshawar	MSc M.phill Edu	07-05-82	Peshawar	09-12-2009	09-12-2009	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2009/10/11/ Recruitment SS F
81	Tahmina Afshah D/O Abdur rauf SS State GGHSS Fazli Raheem DIK	MSc Med	15-4-1983	DIKhan	12-09-2009	12-09-2009	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2009/10/11/ Recruitment SS F
82	Munaza Rafiq D/O M Rafiq SS maths GGHSS Thatli khurd Mansehra	MSc M.Ed	02-02-84	Mansehra	09-12-2009	09-12-2009	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2009/10/11/ Recruitment SS F
83	Natasha Habib HM GGHS shalawan M Agency	Mphil MEd	19-02-64	Mohmand	04-11-1995	10-03-2011	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2011/Headmistress
84	Mst. Abida Amin D/O Muhammad Amin SS Econ GGHSS Panian Haripur	MSc M.Ed	04-01-78	Haripur	09-12-2009	09-12-2009	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2009/10/11/ Recruitment SS F
85	Mst. Nuzhat Bibi D/O Taj Muhammad SS (English) GGHSS No.9 Din Pur DIKhan	MA Mphil	01-03-78	FR Bannu	04-10-2010	04-10-2010	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2009/10/11/ Recruitment SS F
86	Najma Nigar D/O Azizullah Jan, HM GGHS Touda China South Waziristan	MA M.Ed	04-04-80	SWA	01-09-2003	17-03-2011	17	Direct Selectee	No.FS/E/100-83/3052-60. dated 17.3.2011
87	Mst. Rakhshanda D/O Haider Rehman SS (Pak Study) GGHSS No.2 Peshawar Cantt	MA MEd	10-04-80	Peshawar	09-12-2009	09-12-2009	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2009/10/11/ Recruitment SS F
88	Mst. Jamila Begum D/O Amanullah Khan SS Phy. GGHSS Ouch Dir Lower	MSc. MEd	14-03-72	Karak	02-10-1995	09-12-2009	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2009/10/11/ Recruitment SS F
89	Mst. Rukhsana Bibi D/O Prof. Mahmood Ali SS (Maths) GGHSS Paharpur DIKhan	MSc M.Ed	14-08-75	D.I.Khan	22-04-1999	09-12-2009	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2009/10/11/ Recruitment SS F
90	Mst. Saima Ghaffar D/O Abdul Ghafar SS Eng. GGHSS Pacha Kallay Bunir	MSc MEd	14/10/1978	Abbottabad	09-12-2009	09-12-2009	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2009/10/11/ Recruitment SS F
91	Mst. Shaista Gul D/O Akbar Ali SS Maths GGHSS Matta Swat	MSc MPhil	17/08/1980	Swat	09-12-2009	09-12-2009	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2009/10/11/ Recruitment SS F
92	Mst. Kalsoom Bibi D/O Adam Khan SS State GGHSS Shaidu Nowshera	MSc B.Ed	05-10-81	mardan	09-12-2009	09-12-2009	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2009/10/11/ Recruitment SS F

	Name of Officer with academic qualification	Qualification	Date of Birth	Domicile	Date of 1st Appointment in Edu; Deptt	Regular appointment/ Promotion to the present post			REMARKS
						Regular Date	Grade	Method of Recruitment	
1590	Shazia Hina HM BS 17 GGHS Gandyaly Bala Kohat	BA/Bed	15-01-71	Hangu	12-07-1999	25-10-2018	17	By promotion	NO SO (PE)/2-6/DPC Meeting/SST-HM(M/F)/2018
1591	Nusrat Shaheen HM BS 17 GGHS Parmoli Swabi	BA/Bed	02-08-87	haripur	21-09-1999	25-10-2018	17	By promotion	NO SO (PE)/2-6/DPC Meeting/SST-HM(M/F)/2018

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



**GOVT. OF KHYBER PAKHTUNKHWA**  
**ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**  
Email: [educationofficeerat@gmail.com](mailto:educationofficeerat@gmail.com)  
001-0223500

Dated Peshawar the February 10<sup>th</sup>, 2024

Ame B

**NOTIFICATION**

**NO.SO(S/F)E&SED/4-16/2023/Posting/Transfer/**: Consequent upon their promotion from (BS-17) to (BS-18), the following Principals/Vice Principals/Senior Subject Specialists (BS-18) are hereby posted/adjusted on the posts mentioned against each, with immediate effect in the best public interest.

S.N O	Name /F.Name	Current School	Posted at	Remarks
1.	Farah Deeba D/o Aman Ullah Khan	GGHS Baharat Bannu	GGHS Ismail Khel Bannu	AVP of Principal (BS-18)
2.	Sabiha Naz D/o Shamsur Rehman	RPDC (F) Swabi	RPDC (F) Swabi	AVP of Instructor (BS-18)
3.	Farzana Nayyer D/o Muhammad Sabir	GGHSS Mirpur Haripur	GGHSS Baghpur Dheri Haripur	AVP of Principal (BS-18)
4.	Zeenat Yasmin D/o Muslim Khan	GGHS Bashir Abad Peshawar	GGHSS Passani Peshawar	AVP of Principal (BS-18)
5.	Shagufta Anjum D/O Muhammad Masood	GGHS City Railway Station Peshawar	GGHS Cantt. No. 1 Peshawar.	AVP of Principal (BS-18)
6.	Saeeda Begum D/O Hazrat Ali	GGHSS Pacha Kalay Bunner	GGHSS Pacha Kalai Bunner	AVP of Principal (BS-18)
7.	Asma Begum D/O Muhammad Kamal	GGHSS Mathra Peshawar	GGHSS Shaqadar Charsadda	AVP of SS English (BS-18)
8.	Qamar,un Nisa D/O Muhammad Hashim	GGHSS Tikri Karak	GGHSS Kakki Bannu	AVP of Principal (BS-18)
9.	Shagufta Chaman D/O Muhammad Younus	GGHS Raghgan Bajaur	GGHSS Khar. Bajaour	AVP of Principal (BS-18)
10.	Azra Naheed D/O Parvez Khari	GGHSS KTS No.2 Haripur	GGHSS KTS No.2 Haripur.	AVP of SS Mathematics (BS-18)
11.	Shahnaz Syed D/O Syed Mir Ahmad Shah	GGHSS Kombh Peshawar	GGHSS Comboh Peshawar	AVP of Vice Principal (BS-18)
12.	Sabira Sultana D/O Gohar Rehman	GGHSS Khan Rur Haripur	GGHSS Kot Najib Ullah Haripur	AVP of SS Pak Study (BS-18)
13.	Nasreen Sadiq D/O Muhammad Sadiq Khan	GGHSS Mumbathi Barakzai Bannu	GGHSS Ghoriwala Bannu	AVP of Principal (BS-18)
14.	Sahar Naseer D/O Muhammad Nasir Khan	GGHSS Jangle Khel Kohat	GGHSS Jungle Khel Kohat	AVP of SS Statistics (BS-18)
15.	Tajrian D/O Gul Ahmad	GGHSS Turlandi swabi	GGHSS Lahor Swabi	AVP of SS H/Civics (BS-18)
16.	Rehana Naem D/O Fazal Naem	GGCMHS Bicket Ganj Canal Road Mardan	GGHSS Shah Dand Baba Mardan	AVP of SS Pak Study (BS-18)

Secretary & Secondary Education  
Govt. of Khyber Pakhtunkhwa

TESTED



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**GOVT. OF KHYBER PAKHTUNKHWA**  
**ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**

*Email: sectionofficers@gmail.com*

**091-9223588**

17.	Gul Rukh D/O Muhammad Raziq	GGHSS Palonow Malakand	GGHSS Kot Malakand	AVP of Principal (BS-18)
18.	Kausar Roheen D/O Zard Ali Khan	GGHSS Chokara Karak	GGHSS Karak	AVP of (BS-18)
19.	Mehrun Nisa D/O Siraj Ur Rehman	GGHSS Utmanzai Charsadda	GGHSS Sherpao Charsadda	AVP of SS Pak Study (BS-18)
20.	Javaria Ashraf D/O Muhammad Ashraf	GGHSS Comprehansive Abbottabad	GGHSS Comprehansive Abbottabad	AVP of Principal (BS-18)
21.	Tehmina D/O Liaqat Ali	GGHSS Khan Pur Haripur	GGHSS Kot Najib Ullah Haripur	AVP of SS Statistics
22.	Sumaira Rani D/O Abdul Hanan	GGHSS Murad Pur Mansehra	GGHSS Garhi Habibullah Mansehra	AVP of SS Home Economics (BS- 18)
23.	Irum Saba D/O Bakhsh Elahi	GGHSS Baffa Mansehra	GGHSS Havelian Abbottabad	Vice Sr No. 207
24.	Rehana Begum D/O Sadiq Ali	GGHSS Topi Swabi	GGHSS KTS No.2 Haripur	AVP of SS Statistics (BS- 18)
25.	Seema D/O Farman Ullah	GGCMHSS Mingora No.2 for girls Swat	GGHSS Manglowar Swat	AVP of SS English (BS-18)
26.	Shazia Jehangir D/O Jehangir Khan	GGHSS Keri Raiki Abbottabad	GGHSS Kuthwal Abbottabad	AVP of Principal (BS-18)
27.	Soniya Shahnaz D/O Muhammad Hayat	GGHSS Hayat Abad Peshawar	GGHSS Sahibzada Umar Khan Shaheed	AVP of SS Pak Study (BS-18)
28.	Riffat Shafique D/O Muhammad Shafiq	GGHSS Chapra Haripur	GGHSS Kot Najibullah Haripur	AVP of Principal (BS-18)
29.	Tahira Jabeen D/O Muhammad Younus	GGHSS Murad Pur Mansehra	GGHSS No.2 Mansehra	AVP of SS Pak Study (BS-18)
30.	Husna Bibi D/O Ghulam Muhammad	GGHSS No.3 Lakki Marwat	GGHS Nari Panoos Karak	AVP of Principal (BS-18)
31.	Saima Shaheen D/O Ghulam Fareed	GGHSS Behari Colony D.I Khan	GGHSS Mitha Pur D.I. Khan	AVP of Principal (BS-18)
32.	Tahira Naz D/O Ghufra Khan	GGHSS K.T.S No.2 Haripur	GGHSS KTS No.2 Haripur	AVP of SS Statistics (BS- 18)
33.	Samina Naz D/O Abdur Rashid	GGHSS Bilitang Kohat	GGHSS Babri Banda Kohat	AVP of SS Maths (BS-18)
34.	Rana Gul D/O Muhammad Ayub	GGHSS Gujrat Mardan	GGHSS Bakhshali Mardan	AVP of Principal (BS-18)
35.	Uzma Khattak D/O Abdul Qayum Khattak	GGHSS Nowshera Cannt Nowshera	GGHSS Pir Pai Nowshera	AVP of SS History/Civics (BS-18)
36.	Rashida Begum D/O Sarfaraz Khan	GGHSS Haryan Kor Malakand	GGHSS Agra Malakand	AVP of Principal (BS-18)

Section Officer  
Elementary & Secondary Education  
Govt. of Khyber Pakhtunkhwa

ADMITTED



**GOVT. OF KHYBER PAKHTUNKHWA**  
**ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**

Email: [nactionoffice@gmail.com](mailto:nactionoffice@gmail.com)

001-9223500

Check details

37.	Fallma Nawaz D/O Lal Nawaz	GGHSS Mathra Peshawar	GGHS Dogram Karok	AVP of Principal (BS-18)
38.	Tazeem Akhtar D/O Mustafa Khan	GGHSS Dudabor Peshawar	GGHSS Kukki Bannu	AVP of SS History/Civics (BS-18)
39.	Memoona Manzoor D/O Arif Manzoor	GGHSS No.6 Qasaban D.I Khan	GGHSS Kukki Bannu	AVP of SS Physics (BS-18)
40.	Shaheena Anjum D/O Murad Ali Khan	GGHSS Fazal Rahim Colony D.I Khan	GGHS Gul Imam Tank	AVP of Principal (BS-18)
41.	Saima Khalil D/O Muhammadullah Khalil	GGHSS Wadpaga Peshawar	GGHSS Shabqadar Charsadda	AVP of SS Pak Study (BS-18)
42.	Haleema D/O Amir Muhammad	GGHSS Rustam Khel Mardan	GGHSS Sherdil Khan Mardan	AVP of Principal (BS-18)
43.	Shaista Iram D/O Mansif Shah	GGHSS Panian Haripur	GGHSS Kotha Swabi	AVP of SS Pak Study (BS-18)
44.	Fouzia Rehman D/O Maqsoo ur Rheman	GGHSS Havelian Abbottabad	GGHSS Havelian	AVP of SS Maths (BS-18)
45.	Sadia Nazir D/O Muhammad Nazir	GGHSS Mathra Peshawar	GGHSS Akora Khattak Nowshera	AVP of SS Maths (BS-18)
46.	Sadaf Naz D/O Imdad Hussain	GGHSS Mathra Peshawar	GGHSS Shabqadar Charsada	Vice Sr.No 213
47.	Saba Mehboob D/O Mehboob Hassan	GGHSS Panian Haripur	GGHSS Tordher Swabi	AVP of Principal (BS-18)
48.	Nasreen Wazir D/O Din Sarwar Wazir	GGHSS Khan Pur Haripur	GGHSS Kotha Swabi	AVP of SS English (BS-18)
49.	Farah Naz D/O Abdul Jalil Khan	GGHSS Ouch.Dir Lower	GGCMHSS Timargira Dir Lower	AVP of SS Statistics (BS-18)
50.	Nadia Kamal D/O Abdul Kamal	GGHSS Hayat Abad Peshawar	GGHSS Shabqadar Charsadda	AVP of SS English (BS-18)
51.	Roshan Ara D/O Khuna Gul	GGHSS Kabal Swat	GGHSS Charbagh Swat	AVP of Principal (BS-18)
52.	Farida Bano D/O Tehseen Ullah	GGHSS Manglowar Swat	GGHSS Manglowar Swat	AVP of SS (BS-18)
53.	Maimoona Gul D/O Sher Badshah	GGHSS Larama Peshawar	GGHSS Jogiwara Peshawar	AVP of SS Pak Study (BS-18)
54.	Nazia Abbasi D/O Muhammad Ismail	GGCMHSS No.1 Haripur	GGHSS Garhi Habibullah Mansehra	AVP of (BS-18)
55.	Farzana Yasmin D/O Malik Allah Ditta	GGHSS No.5 Qasaban D.I Khan	GGHSS Paharpur D.I Khan	AVP of SS (BS-18)
56.	Nourina Mahsood D/O Jahangir Khan	GGHSS Gara Shahbaz Tank	GGHS Shamsi Khel Bannu	AVP of Principal (BS-18)
57.	Iffat Nosheen D/O Muhammad Jan Khan	GGHSS No.9 Dinpur D.I Khan	GGHSS Ghoriwala Bannu	AVP of SS Physics (BS-18)

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Jogiana  
Bagram Shabq

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Elementary & Secondary Education  
Govt. of Khyber Pakhtunkhwa



**GOVT. OF KHYBER PAKHTUNKHWA**  
**ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**

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58.	Nusrat Mehreen D/O Muhammad Nawaz	GGHSS Skindar Khol Bala Bannu	GGHSS Ghorwalin Bannu	AVP of H/Civics (BS-18)
59.	Misbah Afzal D/O Afzal Balg	GGHSS Topi Swabi	GGHSS Kohu Swabi	AVP SS Economics (BS- 18)
60.	Saima Begum D/O Muhib Ullah	GGHSS Nishtar Abad Peshawar	GGHSS Chamkani Peshawar.	AVP of SS Pak Study (BS-18)
61.	Tahmina Afshan D/O Abdur Rauf	GGHSS Fazal Rahim Colony D.I Khan	GGHSS Dhakki D.I Khan	AVP of Principal (BS-18)
62.	Munaza Rafiq D/O Muhammad Rafiq	GGHSS Thathi Khurd Mansehra	GGHSS Danda Khollan Mansehra	AVP of Vice Principal (BS-18)
63.	Abida Amin D/O Muhammad Amin	GGHSS Panian Haripur	GGHSS Kot Najib Ullah	AVP SS Economics (BS- 18)
64.	Nuzhat Bibi D/O Taj Muhammad	GGHSS No.2 Keri Alizai D.I Khan	GGHSS Nar Jafar Bannu	AVP of Principal (BS-18)
65.	Najma Nigar D/O Aziz Ullah Jan	GGHSS Towda China South Waziristan	GGHSS Nodeh Payan Nowshera.	AVP of Principal (BS-18)
66.	Rakhshanda D/O - Haider Rahman	GGHSS No.2 Cantt Peshawar	RPDC (F) Charsadda	AVP of Instructor (BS-18)
67.	Jamila Begum D/O Amanullah Khan	GGHSS Behzadi Kohat	GGHSS Jungle Khei Kohat	AVP of SS Physics (BS-18)
68.	Rukhsana Bibi D/O Mahmood Ali	GGHSS Paharpur D.I Khan	GGHSS Paharpur D.I Khan	AVP of S.Librarian (BS- 18)
69.	Saima Ghaffar D/O Abdul Ghaffar	GGHSS Kuthiala Abbottabad	GGHSS Bakot Abbottabad	AVP of Principal (BS-18)
70.	Shaista Gul D/O Akbar Ali	GGHSS Matta Swat	GGHSS Manglowar Swat	AVP of SS Pak Study (BS-18)
71.	Kaloom Bibi D/O Adam Khan	GGCMHSS Bicket Ganj Canal Road Mardan	GGHS Bara Banda Nowshera	AVP of Principal (BS-18)
72.	Shahida Hameed D/O Hameed Khan	GGHSS Chapra Haripur	GGHSS Munjal Dir Lower	AVP of SS Maths (BS-18)
73.	Sadia Parveen D/O Ahmad Bakhsh	GGHSS Bilot Sharif D.I Khan	GGHSS Gul E Imam Tank	AVP of V- Principal (BS-18)
74.	Nadia Khan D/O Misal Khan	GGHSS Akbar Pura Nowshera	GGHSS Shabqadar Charsadda	AVP of H/Civics (BS-18)
75.	Fatima Taj D/O Taj Muhammad	GGHSS Paniala D.I Khan	GGHSS Kakki Bannu	AVP of Economics (BS- 18)
76.	Tayyeba Rani D/O Mahboob Ahmad	GGHSS Mansehra No.2 Mansehra	GGHSS Takhli Nasrati Karak	AVP of Principal (BS-18)
77.	Fozia Tabassum D/O Muhammad Miseen	GGHSS Behall Mansehra	GGHSS No.2 Mansehra	Vice Sr.No 208
78.	Qamar Sultana D/O Saeed Khan	GGHSS Landi Kotal Khyber	GGHSS Kalanga Khyber	AVP of SS (BS- 18)

Junior  
to  
Appellant

Recd. Director (SSE)  
Elementary & Secondary Education  
Deptt. Govt. of Khyber Pakhtunkhwa

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**GOVT. OF KHYBER PAKHTUNKHWA**  
**ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**

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001-0223600

79.	Abida Murtaza Khan D/O Murtaza Khan	GGHSS Kulu Khan Swabi	GGHSS Lohar Swabi	AVP of SS English (BS-18)
80.	Shazlin Bibi D/O Muhammad Ajab Khan	GGHSS Nokoi Mansehra	GGHSS Garhi Habibullah Mansehra	Vice Sr.No 211
81.	Tehmina Hannan Lodhi D/O Abdul Hannan Lodhi	GGHSS Daffa Mansehra	GGHSS No 2 Mansehra	AVP Of (BS-18)
82.	Shanaz Begum D/O Hussain Ullah	GGHSS Khyber Colony Peshawar	GGHSS Chankani Peshawar	AVP of SS History/Civics (BS-18)
83.	Rakhshanda Falak D/O Falak Sher	GGHSS Landi Arbab Peshawar	GGHSS Azu Khol Dalu Nowshera	AVP of SS Statistics (BS- 18)
84.	Rashida Gul D/O Abdur Rehman	GGHSS No. 1 Haripur	GGHSS Kot Najib Ullah Haripur	AVP of SS Maths (BS-18)
85.	Rubina Shaheen D/O Rustam Khan	GGHSS Kuthiala Abbottabad	GGHSS Kolha Swabi	AVP of SS History/Civics (BS-18)
86.	Balqis Zareen D/O Muhammad Zarin	GGCMHSS Mingora No.2 for girls Swat	GGHSS Sakhra Swat	AVP of Principal (BS-18)
87.	Rubina Safri D/O Safri	GGHSS Shinkiani Mansehra	GGHSS Lilownai Shangla	AVP of SS Islamiyat (BS-18)
88.	Bibi Sadiqa D/O Saiful Muik	GGHSS Hathlan Mardan	GGHSS Hathian Mardan	AVP of H/Civics (BS-18)
89.	Dur e Shahwar D/O Muhammad Ismail	GGCMHSS Mingora No.2 for girls Swat	GGHSS Kokarai Swat	AVP of Principal (BS-18)
90.	Abida D/O Kachkol	GGHSS Ouch Dir Lower	GGHSS Zara Khela Swat	AVP of Principal (BS-18)
91.	Sobia Bibi D/O Muhammad Nazir	GGHSS Mansehra No.2 Mansehra	GGHSS Mansehra No.2	AVP of SS Physics (BS-18)
92.	Lubna Shahzadi D/O Muhammad Rafiq	GGHSS Trangri Bala Mansehra	GGHSS Garhi Habibullah Mansehra	AVP of SS Maths (BS-18)
93.	Alya D/O Ghulam Rehman	GGHSS Bakhela Malakand	GGHSS Talash Dir Lower	AVP of Principal (BS-18)
94.	Saira Bano D/O Muhammad Ajab	GGHSS Ghari Phulgran Abbottabad	GGHSS KTS No.2 Haripur	AVP of SS History/Civics (BS-18)
95.	Rina Almas D/O Afsar Khan	GGHSS Koli Sadat Bannu	GGHSS Bannu	AVP of SS Statistics (BS- 18)
96.	Ambreen Awan D/O Muhammad Saleem	GGHSS Dhamtor Abbottabad	GGHSS Dhamtor Abbottabad	AVP of SS Statistics (BS- 18)
97.	Maria D/O Habib Khan	GGHSS Koper Malakand	GGHSS Ningolai Swat	AVP of Principal (BS-18)
98.	Shaheema Rehman D/O Fazal Rehman	GGHSS Landi Arbab Peshawar	GGHSS Mian Kalay Dir Lower	AVP of Principal (BS-18)
99.	Shamim D/O Sher Zameen Gul	GGHSS Shawa Dir Lower	GGHSS Shawa Dir Lower	AVP of Principal (BS-18)

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**GOVT. OF KHYBER PAKHTUNKHWA**  
**ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**

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100.	Nazia Shaheen D/O Lahrasab Khan	GGHSS Malik Pura Abbottabad	GGCHSS Abbottabad	AVP of SS Physics (BS-18)
101.	Ambrina Andaleeb D/O Waris Khan	GGHSS Lachi Kohat	GGHSS Ghoriwala Bannu	AVP of SS Physics (BS-18)
102.	Tasfeen Sanan D/O Mahfooz Ur Rehman	GGHSS Nishtar Abad Peshawar	GGHSS Jogiwara Peshawar	AVP of SS Physics (BS-18)
103.	Salma Nigar D/O Irshad Ahmad	GGHSS Lady Griffith Peshawar	GGHSS Chamkani Peshawar	AVP of SS Physics (BS-18)
104.	Humaira Yasmin D/O Muhammad Amin	GGHSS Sawal Dher Mardan	GGHSS Babeni Mardan	AVP of Principal (BS-18)
105.	Ishrat D/O Habib Raziq	GGHSS Kalpanai Bunner	GGHSS Kalpanai Buner	AVP of Principal (BS-18)
106.	Nadia Sikandar D/O Sikandar Khan	GGHSS Malik Pura Abbottabad	GGHSS Kotha Swabi	AVP of SS Statistics (BS- 18)
107.	Bakht Biland Sadia D/O Faqir Said	GGHSS Kalpanai Bunner	GGHSS Cheena Buner	AVP of Principal (BS-18)
108.	Aneela Kausar D/O Hafiz Fazle Rauf	GGHSS Takht Bhai Mardan	GGHSS Mad Baba Mardan	AVP of Principal (BS-18)
109.	Naheed Raina D/O Haji Faiz Muhammad	GGHSS Fazal Rahim Colony D.I Khan	GGHSS Fazal Rahim Colony D.I Khan	AVP of Principal (BS-18)
110.	Sajida Khan D/O Khan Badshaha	GGHSS Shawa Dir Lower	GGHSS Koto Dir Lower	AVP of Principal (BS-18)
111.	Yasmin Sony D/O Sarzameen Khan	GGHSS Kalabat Swabi	GGHSS Lahor Swabi	AVP of SS Maths (BS-18)
112.	Atia Aziz D/O Aziz ur Rehman	GGHSS No.9 Dinpur D.I Khan	GGHSS No.2 Bannu	AVP of SS Pak Study (BS-18)
113.	Nafeesa Ashraf D/O Muhammad Ashraf	GGHSS Mirpur Abbottabad	GGHSS Dhamtour Abbottabad	AVP of SS Maths (BS-18)
114.	Lubna D/O Muhammad Sher Khan	GGCMHSS Timargara Dir Lower	GGCMHSS Timargira Dir Lower	AVP of SS History/Civics (BS-18)
115.	Sadia Aziz D/O Aziz Gul	GGCMHSS Canal Road Mardan	GGCMHSS Mardan	AVP of SS Physics (BS-18)
116.	Nusrat Shaheen D/O Noor Muhmmad	GGHSS Munda Dir Lower	GGHSS Saddo Dir Lower	AVP of SS Pak Study (BS-18)
117.	Sheher Bano D/O Ishaq Hussain	GGHSS Luqman Khel Kurram	GGHSS Qubadshah Khel Kurram	AVP of Principal (BS-18)
118.	Nareen Ahmad D/O Ahmad Jan	GGHSS Paniala D.I Khan	GGHSS Kakki Baanu	AVP of SS Pak Study (BS-18)
119.	Noshin Alia D/O Mukhtarul Islma	GGHSS Kakul Abbottabad	GGHSS Havelian Abbottabad	AVP of SS Physics (BS-18)

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120.	Humaira Saeed D/O Muhammad Saeed	GGHSS Khan Pur Haripur	GGHSS Lahor Swabi	AVP of SS Statistics (BS- 18)
121.	Aisha Kokab D/O Muhammad Ayaz	GGHSS Baffa Mansehra	GGHSS Garhi Habibullah Mansehra	AVP of SS Physics (BS-18)
122.	Riffat Naz D/O Zulan Khan	GGHSS Kolkay Payan Dir Lower	GGHSS Kolkay Payokhol Dir Lower	AVP of Principal (BS-18)
123.	Shazia Gul D/O Zumarab Khan	GGHSS Bandi Muneem Haripur	GGHSS Ulla Swabi	AVP of SS Chemistry (BS- 18)
124.	Riffat Nazli D/O Mir Nawab Khan	RPDC (F) Jamrud	GGHSS Kall Garhi Mardan	AVP of Principal (BS-18)
125.	Sajida Kanwal D/O Khaliq Dad	GGHSS No.9 Dinpur D.I Khan	GGHSS Paharpur D.I Khan	AVP of Principal (BS-18)
126.	Naheed Anwar D/O Muhammad Hussain	GGHSS Turlandi swabi	GGHSS Turlandi swabi	AVP of Principal (BS-18)
127.	Aliya Bibi D/O Abdul Wadood	GGHSS Gumbat Kohat	GGHSS Jungle Khel Kohat	AVP of SS History/Civics (BS-18)
128.	Adeela Iqbal D/O Muhammad Iqbal Khan	GGHSS Kot Sadat Bannu	GGHSS KTS No.2 Haripur	AVP of SS Physics (BS-18)
129.	Sitara Zaidi D/O Muhammad Sarwar	GGHSS Baffa Mansehra	GGHSS Baffa Mansehra	AVP of V Principal (BS-18)
130.	Gul Meena D/O Nowsherwan	GGHSS Matta Swat	GGHSS Fatehpur Swat	AVP of Principal (BS-18)
131.	Saiqa Iqbal D/O Muhammad Iqbal	GGHSS Qamar Zaman Mandew Bannu	GGHSS Bahader Mughal Khel Bannu	AVP of Pak Study (BS-18)
132.	Sania Aman D/O Aman Ullah Khan Bangash	GGHSS Jungle Khel Kohat	GGHSS Jungle Khel Kohat	AVP of SS Pak Study (BS-18)
133.	Asia Bibi D/O Gohar Rehman	GGHSS No.1 Haripur	GGHSS Kotha Swabi	AVP of SS Biology (BS-18)
134.	Nilofer Kausar D/O Rahmat Ullah	GGHSS Rashakai Nowshera	GGHSS Nowshera Kalan Nowshera	AVP of SS Biology (BS-18)
135.	Riffat Jabeen D/O Khan Officer	GGHSS Panian Haripur	GGHSS Lahor Swabi	AVP SS (BS-18)
136.	Sadia Mehmood D/O Mehmood-Ur Rehman	GGHSS Lachi Kohat	GGHSS Babri Banda Kohat	AVP of SS History/Civics (BS-18)
137.	Safia Naz Qazi D/O Qazi Tajul Arifeen	GGHSS Rashakai Nowshera	GGHSS Akora Khattak Nowshera	AVP of SS History/Civics (BS-18)
138.	Shabana Naz D/O Abdul Malik	GGHSS Ziam Charsada	GGHSS Sherpao Charsadda	AVP of SS Physics (BS-18)
139.	Shazia Jabeen D/O Salah Uddin	GGHSS Hayat Abad Peshawar	DPD Peshawar	AVP of Instructor (BS-18)

Handwritten notes in the right margin, including "GGHSS Sp...", "Kas... Jamrud as Principal", and "Class 1".

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**GOVT. OF KHYBER PAKHTUNKHWA**  
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140.	Qanita Haq D/O Siraj ul Haq	GGHSS Khyber Colony Peshawar	GGHSS Shabqadar Charoadda	AVP of SS Islamiyat (BS-18)
141.	Ambareen Saleem D/O Saleem Afzal	GGHSS Shinklari Mansehra	GGHSS Kolha Swabi	AVP of Urdu (BS-18)
142.	Salma	GGHSS Mathra Peshawar	GGCMHSS Mardan	AVP of SS Biology (BS-18)
143.	Bushra Ashraf D/O Muhammad Ashraf	GGHSS Kakul Abbottabad	GGHSS Sherwan Abbottabad	AVP of SS Statistics (BS- 18)
144.	Naimat Bibi D/O Muhammad Kareem	GGHSS Bilitang Kohat	GGHSS Babri Banda Kohat	AVP of SS Chemistry (BS- 18)
145.	Maryam Bibi D/O Altaf Hussain	GGHSS Karak	GGHSS No.1 Karak	AVP of SS Physics (BS-18)
146.	Madiha Gul D/O Muhammad Muzaffar	GGHSS Shinklari Mansehra	GGHSS Garhi Habibullah Mansehra	AVP of SS Economics (BS- 18)
147.	Farhana Begum D/O Habib ur Rehman	GGHSS No.1 Kohat	GGHSS Babribanda Kohat	AVP of SS Pashto (BS-18)
148.	Sobia Tabassum D/O Abdul Malik Khan	GGHSS Malik Pura Abbottabad	GGHSS Aloch Shangla	AVP of Principal (BS-18)
149.	Nabila Shamas D/O Shams Ur Rehman	GGHSS Chakdara Dir Lower	GGHSS Ziarat Talash Dir Lower	AVP of SS Urdu (BS-18)
150.	Bibi Asia D/O Abd Ul Wahab	GGHSS Karak	GGHSS No.1 Karak	AVP of SS Islamiyat (BS-18)
151.	Nishat Bibi D/O Waris Khan	GGHSS Togh Bala Kohat	GGHSS Babri Banda Kohat	AVP of SS Chemistry (BS- 18)
152.	Asma Shahzadi D/O Shah Mad	GGHSS Gulshan Abad Swat	GGHSS Manglowar Swat	AVP of SS (BS- 18)
153.	Adeela Batool D/O Syed Riaz Hussain	GGHSS No.5 Qasaban D.I Khan	GGHSS Kotka Bilawar Bannu	AVP of Principal (BS-18)
154.	Sana Dilnasheen Fatima D/O Hanif Tariq	GGHSS Behari Colony D.I Khan	GGHSS Ama Khel Tank	AVP of Principal (BS-18)
155.	Rukhsana Begum D/O Rais Khan	GGHSS Behzadi Kohat	GGHSS Behzadi Kohat	AVP of (BS-18)
156.	Nazia Shaheen D/O Sadiq Hussain	GGHSS Malik Pura Abbottabad	GGHSS Lilownai Shangla	AVP of SS Pashto (BS-18)
157.	Lubna Shaukat D/O Aurang Zeb	GGHSS Shinklari Mansehra	GGHSS Garhi Habibullah Mansehra	AVP of SS Chemistry (BS- 18)
158.	Nazia Nawaz D/O Haq Nawaz	GGHSS Ghazani Khel Lakki Marwat	GGHSS Masha Mansoor Lakki Marwat	AVP of Principal (BS-18)
159.	Asiya Bibi D/O Syed Gulzar Shah	GGHSS Gandhian- Mansehra	GGHSS Oghi Mansehra	AVP of SS Chemistry (BS- 18)
160.	Asmat Bibi D/O Ghulam Sarwar	GGHSS Kunda Swabi	GGHSS Jalbai Swabi	AVP of Principal (BS-18)

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161.	Umber Rubail D/O Khizar Hayat	GGHSS Behzadi Kohat	GGHSS Keri Sheikhan Kohat	AVP of Principal (BS-18)
162.	Zahida Bibi D/O Sher Ahmad	GGHSS Malik Pura Abbottabad	GGHSS Dhamtor Abbottabad	Vice Sr. No 210
163.	Musarrat Shaheen D/O Muhammad Ali	GGHSS Karak	GGHSS Karak	AVP of SS Maths (BS-18)
164.	Najma Nazir D/O Nazir Gul	GGHSS Utmanzal Charsada	GGHSS Umarzai Charsadda	AVP of Principal (BS-18)
165.	Fouzia Wahid D/O Muhammad Wahid	GGHSS Havelian Abbottabad	GGHSS Lilownai Shangla	AVP of SS Chemistry (BS- 18)
166.	Tayyaba Taj D/O Taj Bar Khan	GGHSS Dagai Swabi	GGHSS Dagai Swabi	AVP of Principal (BS-18)
167.	Shaista Sikandar D/O Sikandar Khan	GGHSS Kakul Abbottabad	GGHSS Havelian Abbottabad	AVP of SS Economics (BS- 18)
168.	Saima Noreen D/O Khalil ur Rehman	GGHSS Panian Haripur	GGHSS kotha Swabi	AVP of SS Maths (BS-18)
169.	Mehnaz Shah D/O Muhammad Shah	GGHSS Khar Malakand	GGHSS Gowalirai Swat	AVP of Principal (BS-18)
170.	Toheed Murad D/O Syed Murad Ali Shah	GGHSS No.1 Mardan	GGHSS Tambok Mardan	AVP of Principal (BS-18)
171.	Nighat Khan D/O Misal Khan	GGHSS Akbar Pura Nowshera	GGHSS Nowshera Kalan	AVP of SS English (BS-18)
172.	Maryam Saddiqa D/O Roohul Amin	GGCMHS Bicket Ganj Canal Road Mardan	GGHSS Khwaja Rashakai Mardan	AVP of Principal (BS-18)
173.	Rubina Naz D/O Yar Qand	GGHSS Shah Mansoor Swabi	RPDC (F) Swabi	AVP of Instructor (BS-18)
174.	Sidratul Muntaha D/O Muhammad Mumtaz	GGHSS Murad Pur Mansehra	GGHSS Sherghar Mansehra	AVP of SS English (BS-18)
175.	Samina Bibi D/O Muhammad Younas	GGHSS Ghari Phulgran Abbottabad	RPDC (F) Abbottabad	AVP of Instructor (BS-18)
176.	Saiqa Gul D/O Gulzar Khan	GGHSS Sherwan Abbottabad	GGHSS Lilownai Shangla	AVP of SS Maths (BS-18)
177.	Nighat Bibi D/O Sultan Said	GGHSS Rustam Khel Mardan	GGHSS Ikram Pur Mardan	AVP of Principal (BS-18)
178.	Nabila D/O Muhammad Rashid	GGHSS Shakakot Malakand	GGHSS Sakhakot Malakan	AVP of S.Librarian (BS- 8)
179.	Saeeda Akhtar D/O Akbar Ali Khan	GGHSS Togh Bala Kohat	GGHSS Togh Bala Kohat	AVP of Pak Study (BS-18)
180.	Nadia Rauf D/O Abdur Rauf	GGHSS Bicket Ganj Canal Road Mardan	GGCMHSS Mardan	AVP of SS History/Civics (BS-18)
181.	Safia D/O Fazal Wahid	GGHSS Takht Bhai Mardan	GGHSS Munjai Dir Lower	AVP of SS Chemistry (BS- 18)

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182.	Musarat D/O Hidalullah	GGHSS Pabbi Nowshera	GGHSS Akora Khtak Nowshera	AVP of SS Hlstory/Civics (BS-18)
183.	Salma Waheed D/O Waheed Khan	GGHSS Takht Bhal Mardan	GGHSS Shahdand Baba Mardan	AVP of Principal (BS-18) AVP
184.	Farzana Shaheen D/O Muhammad Aslam	GGHSS Hattar Haripur	GGHSS Pabaini Swabi	AVP of Principal (BS-18)
185.	Haleema Shakir D/O Irshad Ahmad Shakir	GGHSS Baffa Mansehra	GGHSS Lilownal Shangla	AVP of Principal (BS-18)
186.	Khadija Bibi D/O Farid Ul Haq	GGHSS Taru Jabba Nowshera	GGHSS Ghalanal Mohmand	AVP of SS Statistics (BS- 18)
187.	Shazia Rehman D/O Abdur Rehman	GGHSS Dinga Haripur	GGHSS Kalinjer Haripur	AVP of Principal (BS-18)
188.	Nazish Akhtar D/O Syed Jafar Shah	GGHSS Kalabat Swabi	GGHSS Lahor Swabi	AVP of SS Islamiyat (BS-18)
189.	Naila Begum D/O Sardar Ali	GGHSS Lady Griffith Peshawar	GGHSS Jungle Khel Kohat	AVP of Principal (BS-18)
190.	Jamila Naz D/O Khandali	GGHSS No.1 Mardan	GGHSS Shah Dand Baba Mardan	AVP of Principal (BS-18)
191.	Najmul Sahar D/O Muzammil Hussain	GGCMHS Bicket Ganj Canal Road Mardan	GGCMHSS Mardan	AVP of Principal (BS-18)
192.	Sadia Riaz D/O Muhammad Riaz	GGHSS Dingi Haripur	GGHSS Nulla Soha Swabi	AVP of Principal (BS-18)
193.	Farzana D/O Ihsan Ullah	GGHSS Nishtar Abad Peshawar	GGHSS University Town Peshawar	AVP of SS Statistics (BS- 18)
194.	Ishrat D/O Mian Gul Darwish	GGHSS Madyan swat	GGHSS Madyan swat	AVP of Principal (BS-18)
195.	Aneela Ashraf D/O Muhammad Ashraf	GGHSS Shahbaz Azam D.I Khan	GGHSS No.2 Bannu	AVP of SS Statistics (BS- 18)
196.	Gul-e-Yasmin D/O Muhammad Salim	GGHSS Sheyaqotak Lower Chitral	GGHSS Sheyaqotek Lower Chitral	AVP of (BS-18)
197.	Tasleem Fatima D/O Ghulam Sadiq	GGHSS No.8 Sherizai D.I Khan	GGHSS Dheri Saidan Bannu	AVP of Principal (BS-18)
198.	Shabnum Naz D/O Mosam Khan	GGHSS Titter Khel Lakki Marwat	GGHS Dallo Khel Lakki Marwat	AVP of Principal (BS-18)
199.	Saima Kamal D/O Mustafa Kamal	GGHSS Saro Shah Mardan	GGHSS Sarosha Mardan	AVP of Principal (BS-18)
200.	Bibi Zainab D/O Nimat Ullah	GGHSS Fazal Rahim Colony D.I Khan	GGHSS Pezu Lakki Marwat	AVP of Principal (BS-18)
201.	Shazia Faiz Baloch D/O Faiz Ullah Khan Baloch	GGHSS Fazal Rahim Colony D.I Khan	GGHSS No.2 Bannu	AVP of SS Islamiyat (BS-18)
202.	Rashida Begum D/O Khan Zada	GGHSS Lachi Kohat	GGHSS Jungle Khel Kohat	Vise Sr.No 212

District Officer (S/P)  
Elementary & Secondary Education  
Deptt. Govt. of Khyber Pakhtunkhwa

ATTESTED



**GOVT. OF KHYBER PAKHTUNKHWA**  
**ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**

Email: [sectionofficersf@gmnl.com](mailto:sectionofficersf@gmnl.com)

091-9223588

203.	Farida D/O Muhim Khan	GGHSS No. Saidu Sharif Swat	GGHSS Manglowar Swat	AVP of SS Economics (BS-18)
204.	Sabina Begum D/O Sadi Muhammad	GGHSS Shaidu Nowshera	GGHSS Jahangira Swabi	AVP of SS Maths (BS-18)
205.	Syed Sahira Batool D/O Syed Lahi Hussain Shah	GGHSS Baffa Mansehra	GGHSS Kotha Swabi	AVP of SS History/ Civics (BS-18)
206.	Shahida Shabnum D/O Sardar Wali ur Rahman	RPDC (F) Abbottabad	RPDC (F) Abbottabad	Vice Sr. No. 214
<b>Consequential Postings/Transfers</b>				
207.	Dure Shahwar SS Economics (BS-17)	GGHSS Havelian Abbottabad	GGHSS Baffa Mansehra	Vice Sr.No.23
208.	Sadia Zahoor SS Urdu (BS-17)	GGHSS No.2 Mansehra	GGHSS Behali Mansehra	Vice Sr. No. 77
209.	Farhat Kousar SS Chemistry (BS-17)	GGHSS Garhi Habibullah Mansehra	GGHSS Shinkiani Mansehra	Vice Sr. No. 157
210.	Abida Parveen SS Chemistry (BS-17)	GGHSS Dhamtor Abbottabad	GGHSS Malikpura Abbottabad	Vice Sr. No. 162
211.	Raisa Sultan SS Biology (BS-7)	GGHSS Garhi Habibullah Mansehra	GGHSS Nokol Mansehra	V. Sr. No. 80
212.	Riffat Shaheen SS Urdu (BS-17)	GGHSS Jungle Khel Kohat	GGHSS Lachi Kohat	Vice. Sr No. 202
213.	Sumayya Hassan SS Economics (BS-17)	GGHSS Shabqadar Charsadda	GGHSS Shabqadar Charsadda	AVP of SS English (BS-17)
214.	Muska Nazir SS Economics (BS-17)	RPDC (F) Abbottabad	RPDC (F) Abbottabad	Vice Sr. No. 206

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT.

Endst: of even No. & date:

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officers (Female), concerned.
4. District Accounts Officers, concerned.
5. Director EMIS, E&SE Department for uploading at official website at the earliest.
6. PS to Secretary, E&SE Department.
7. Officer concerned.
8. Office order file.

(SHAWANA HALEEM)  
SECTION OFFICER (S/F)

To

- 15 Annex C<sup>2</sup>

The Director of Elementary & Secondary  
Education Khyber Pakhtunkhwa  
Peshawar.

Subject: Promotion of teachers from BPS 17-18

Respected Madam,

Your kind attention is invited to the subject  
notification dated 19/02/24 in which 214 teachers have been  
promoted from BPS 17-18 but unfortunately my name at  
Sr# 83 of the seniority list has been left out from the  
promotion for unknown reason. Copy of the seniority list &  
promotion notification is attached.

In view of the above it is requested that  
I may also be promoted to BPS-18 & oblige.

ADMBL 71

*[Handwritten signature]*

*[Handwritten signature]*

Natasha Habib  
Head Mistress

GGHS Shehram Sad

HEAD MISTRESS  
GGHS Shah Alam Se.  
District Mohmand

20/02/2024

0351-9669594

ATTESTED

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C

Before the Honorable Secretary Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

Appellant: Mst. Natasha Habib Head Mistress GGHS Shah Alam Sali, Distt: Mohmand

16  
Amica D  
Departmental appeal against the notification dated 19-02-2024 issued by the office of Worthy  
Director Elementary & Secondary Education Khyber Pakhtunkhwa i.e. the promotion list of teachers  
from B.P.S 17 to 18.

Respectfully Sir;

The appellant submits as under;

1- That the appellant is serving as Head Mistress in the above said GGHS Shah Alam Sali, Distt: Mohmand.

2- That as per seniority list, the appellant is entitled for promotion but unfortunately her name has not included in the list of promoted teachers issued vide notification dated 19-02-2024.

(Copies of notification dt: 19-02-2024 and Seniority List are attached herewith)

3- That the appellant submitted an application and invited the kind attention of Worthy Director Elementary & Secondary Education Khyber Pakhtunkhwa to the issued notification while he advised proper departmental appeal before competent authority. (Copy of the application is attached herewith)

4- That the appellant being aggrieved of the said notification prefers the instant appeal before this Hon'ble Appellate Forum on the following grounds amongst others;

Grounds:

a- That the name of appellant is on Serial No: 83 wherein 214 teachers promoted vide said notification dated 19-02-2024 but the appellant has left out of the promotion list.

b- That the appellant submitted all ACRs in time.

c- That the appellant has not submitted the ACR for 2022 because of no information/intimation by the department.

d- That the appellant is ready to submit the ACR of 2022.

e- That the promotion of the appellant is not barred by any law i.e. Civil Services Rules and Civil Servants Act.

It is, therefore, most humbly prayed that on acceptance of instant appeal the appellant may kindly be promoted to BPS-18 as done in the case of teachers vide notification no No.SO(S/F)E&SED/4-18/2023/posting/transfer.

Note. My retirement date is 18/02/2024 and I have submitted application for retirement to the DEO Female Mohmand and my retirement order may please be issued in BPS-18.

40

Fazal Hussain Sb  
Letter  
to Director

Natasha Habib  
Natasha Habib

Head Mistress GGHS Shah Alam Sali

Date: 07/02/2024

RECEIVED



**GOVT. OF KHYBER PAKHTUNKHWA**  
**ELEMENTARY & SECONDARY EDUCATIOND DEPARTMENT**

Email: [soctionofficersf@gmail.com](mailto:soctionofficersf@gmail.com)

091-9223588

No. SO(S/F) E&SE/4-24/20224/TS

Dated Peshawar the March 8<sup>th</sup> 2024

To

Director,  
Elementary & Secondary Education Department  
Khyber Pakhtunkhwa, Peshawar

Subject: APPEAL REGARDING PROMOTION

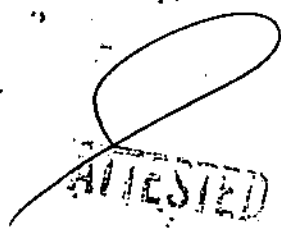
I am directed to the subject noted above and to enclose herewith a copy of self-explanatory appeal submitted by Mst. Natasha Habib Headmistress GGHS Shah Alam Sali District Mohmand, for further necessary action, as per rule/policy please.

  
(SHAWANA HALEEM)  
SECTION OFFICER (S/F)

Endst: Even No. & Date:

Copy of the above is forwarded to PS to Secretary, E&SE Department

  
SECTION OFFICER (S/F)

  
ATTESTED





GOVERNMENT OF KHYBER PAKHTUNKHWA  
ESTABLISHMENT & ADMN: DEPARTMENT  
(Regulation Wing)

No. SOR-I(E&AD)2-3/2018  
Dated Peshawar the 23<sup>rd</sup> September, 2024

To,  
The Secretary to Govt. of Khyber Pakhtunkhwa,  
Elementary & Secondary Education Department.

Subject: - APPEAL REGARDING PROMOTION

Dear Sir,

I am directed to refer to your letter No.SO (S/F)E&SED/4-9/2024 dated 28.08.2024 on the subject noted above and to state that appeal of the Ex-Head Mistress concerned for promotion is not covered under the Khyber Pakhtunkhwa Promotion Policy, 2009.

Yours faithfully,

(MUHAMMAD KALEEM JAI)  
SECTION OFFICER (R-I)  
Phone # 091-9210860

S/C

TESTED

WAKALAT NAMA

IN THE COURT OF K.P Service Tribunal Peshawar

Natasha Habib

Appellant(s)/Petitioner(s)

VERSUS

Govt of KPK etc

Respondent(s)

I/We Appellants do hereby appoint  
**Mr. Khaled Rehman**, Advocate, Supreme Court & **Mr. Muhammad Ghazanfar Ali**, Advocates in the above mentioned case, to do all or any of the following acts, deeds and things.

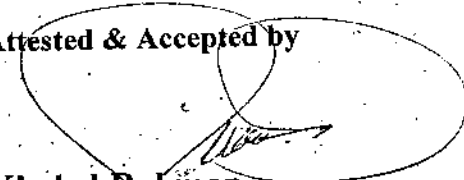
1. To appear, act and plead for me/us in the above mentioned case in this Court/Tribunal in which the same may be tried or heard and any other proceedings arising out of or connected therewith.
2. To sign, verify and file or withdraw all proceedings, petitions, appeals, affidavits and applications for compromise or withdrawal or for submission to arbitration of the said case, or any other documents, as may be deemed necessary or advisable by them for the conduct, prosecution or defence of the said case at all its stages.
3. To receive payment of, and issue receipts for, all moneys that may be or become due and payable to us during the course of proceedings.

AND hereby agree:-


- a. That the Advocate(s) shall be entitled to withdraw from the prosecution of the said case if the whole or any part of the agreed fee remains unpaid.

In witness whereof I/We have signed this Wakalat Nama hereunder, the contents of which have been read/explained to me/us and fully understood by me/us this \_\_\_\_\_

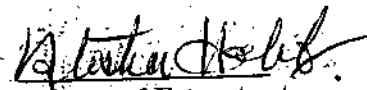
Attested & Accepted by

  
**Khaled Rehman,**  
Advocate,  
Supreme Court of Pakistan

&

  
**Muhammad Ghazanfar Ali**  
Advocate, High Court

4-B, Haroon Mansion  
Khyber Bazar, Peshawar  
Off: Tel: 091-2592458

  
Signature of Executants