


FORM OF ORDER SHEET

Court of _____

Appeal No.

2207/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	30/10/2024	<p>The appeal of Mst.Hajira Bibi resubmitted today by Junior of Counsel for the appellant. It is fixed for preliminary hearing before touring Single Bench at Swat on 02.12.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

The appeal of Mst. Hajira Bibi received today i.e on 22.10.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1) Annexures-C & D of the appeal are illegible be replaced by legible/better one,
- 2- Address of appellant is incomplete be completed according to rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 3- According to sub-rule-4 of rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974 respondent nos. 2 and 4 are unnecessary/improper parties, in light of the rules ibid and on the written direction of the Worthy Chairman the above mentioned respondent number be deleted/struck out from the list of respondents.

No. 934 /Inst./2024/KPST,

Dt. 22/10 /2024.

Amatullah
ADDITIONAL REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Saifullah Mangol Adv.
High Court at Swat.

- 1) Better copies of annexure-C & D are attached.
- 2-) Address of the applicant is completed now.
- 3) ~~Note~~. Respondent No.4 is removed.

Note. ~~Re~~ The name of Respondent No.2 added as necessary party in the penal of Respondents because her order dated 23⁹/₂₄ have been made impugned. Hence The instant service appeal filed against the impugned order dated 23⁹/₂₄ passed by the Respondent No.2. So Respondent #2 is necessary party in the instant service appeal.

[Signature]
30/10/2024

(B)

saifmongol@gmail.com

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR
Service Appeal No: - 2207 /2024

Hajira Bibi

.....Appellant

Versus

Director Elementary & Secondary Edu KP & othersRespondents

INDEX

S#	Description of the Documents	Annex	Pages
1.	Grounds of Service Appeal with affidavit	*	1-6
2.	Addresses of parties	*	7
3.	copy of appointment letter and medical certificate	"A & B"	8-11
4.	Copy of application dated 10-07-2023 and seniority list	"C & D"	12-15
5.	Copy of Departmental appeal/representation, fact finding inquiry report and office order dated 23-09-2024	"E to G"	16-29
8.	Copy of monitoring and evaluation report	"H"	30-32
11.	Other relevant documents	"I"	33-39
12.	Notice to respondents with receipt		40
13.	Special Power of Attorney		41
14.	Wakalat Nama		42

سید سائیف منگول

Dated: 22-10-2024

Appellant

Through: -

سید سائیف منگول

SAIF ULLAH MONGOL (CHITRALI)
ADVOCATE HIGH COURT
CHITRAL LAW CHAMBER AT SWAT,
OFFICE NO.A-32, FIRST FLOOR SULTAN
TOWER, MAKANBAGH MINGORA, SWAT
CONTACT # +92344-1040226 / +92333-8340226
saifmongol@gmail.com

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR

Service Appeal No: - 2207 /2024

Hajira Bibi D/o Gul Khan R/O Akhgram, Tehsil Wari District Dir Upper
Senior Drawing Master (BPS-10) Government High School Pashta
Elementary and Secondary Education Department District Dir Upper.
.....Appellant

Versus

1. Director Elementary & Secondary Education (E&SE) Khyber Pakhtunkhwa Peshawar.
2. Deputy Director (Female) Elementary & Secondary Education (E&SE) Khyber Pakhtunkhwa Peshawar.
3. District Education Officer (Female) District Dir Upper.

..... Respondents

SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED OFFICE ORDER NO.3610/. FNO A-17/F/APPEAL/DIR LOWER DATED 23-09-2024 ISSUED BY THE RESPONDENT NO.2 WHEREBY THE APPELLANT CHALLENGED THE PROMOTION / SENIORITY LIST OF SENIOR DRAWING MASTER BPS (16) BUT THE RESPONDENT AFTER INQUIRY STRUCT DOWN THE DEPARTMENTAL APPEAL OF THE APPELLANT AND RESULTANTLY DEPARTMENTAL APPEAL AGAINST THE WRONG AND INCORRECT SENIORITY LIST AND PROMOTION DATED 22-05-2020 HAS BEEN DISMISSED.

PRAYER IN APPEAL:

On acceptance of the instant service appeal

A. OFFICE ORDER NO.3610/. FNO A-17/F/APPEAL/DIR LOWER DATED 23-09-2024 ISSUED BY THE RESPONDENT NO,1 MAY KINDLY BE DECLARED ILLEGAL, VOID AB INITIO UPON THE RIGHTS OF THE APPELLANT.

- B. THE RESPONDENT NO.1 to 3 MAY KINDLY BE DIRECTED TO ISSUE PROMOTION ORDER OF THE APPELLANT AS SENIOR DRAWING MASTER BPS (16) FROM 22-05-2020 INSTEAD OF 30-12-2021 WITH ALL BACK BENEFITS AND SENIORITY.
- C. THE RESPONDENTS MAY KINDLY BE STRICTLY DIRECTED TO IMPLEMENT THE RECOMMENDATIONS SPECIAL DIRECTIVES MADE BY THE PLANNING AND DEVELOPMENT DEPARTMENT GOVERNMENT OF KHYBER PAKHTUNKHWA (AVAILABLE AT PAGE 30 OF THE INSTANT SERVICE APPEAL)
- D. ANY OTHER REMEDY, WHICH IS JUST, EQUITABLE AND EFFICACIOUS, IN PECULIAR CIRCUMSTANCES OF THE CASE, MAY ALSO BE GRACIOUSLY AWARDED IN FAVOR OF THE APPELLANT AND AGAINST THE RESPONDENTS.

Respectfully Sheweth:-

The facts pertaining to this appeal are as under: -

1. That the names and addresses of the parties have correctly been having in the head note of the instant service Appeal, which are sufficient for the purpose of effecting their proper services and citation etc.
2. That the Appellant appointed as Drawing Master (BPS-15) by the respondents in the year 2014 and promoted to the post of Senior Drawing Master (BPS-16) on 30-12-2021 and performing her duties with honesty and punctuality till date.

(copy of appointment letter and medical certificate are attached as Annexure A & B)

3. That the other colleagues have been promoted from Drawing Master (BPS-15) to the post of Senior Drawing Master (BPS-16) on 22-05-2020, in this regard the appellant filed an application to the respondent No.3 for providence of attested copy of seniority list of Drawing Master (BPS-15) for promotion of SDM (BPS-16), but till date no copy has been provided to the appellant.

(Copy of application dated 10-07-2023 and seniority list are attached as C & D)

It is very important to mention here that the ibid promotion was held in violation of principles of merit and fitness.

4. That the Appellant filed Departmental representation/Appeal on 02-10-2023 to the respondent No.1 by addressing her grievances upon non-promotion of the appellant as SDM from 22-05-2020, in response the respondent No.1 constituted an inquiry by heading of Mst: Shamim Akhtar B-19 DEO (Female) District swat, who submitted her facts finding inquiry report on 20-08-2024 with the below recommendations: -

"Appeal of the appellant being devoid of merit and against the appeal rules, may be struck down".

The respondent No.2 issued impugned office order dated 23-09-2024 by dismissing the departmental representation filed by the appellant, on the *ibid* inquiry basis.

Hence the instant service appeal.

(Copy of Departmental appeal/representation, fact finding inquiry report and office order dated 23-09-2024 are attached as Annexure E TO G).

GROUNDS: -

- A. That the Appellant is natural born bona fide citizen of Islamic Republic of Pakistan and fully and equally entitled to all basic and fundamental rights as supported and guaranteed by constitution of Islamic republic of Pakistan, 1973 and specially entitled all benefits under article 27 of the constitution which safeguard against discrimination in services, interpreted and discrimination along with unfettered exercise of discriminative powers by an authority/ department / office is always been deplored and deprecated by the superior court
- B. That the appellant submitted an application / complaint to the Director planning and development department (monitoring & evaluation system) Government of Khyber PAKHTUNKHUWA for taking strict action against the discrimination in preparing of the *ibid* seniority list and finally the appellant have been deprived for her legal and accrued rights, thereafter monitoring & evaluation report has been submitted with the recommendations.
 2. It is recommended that the education department of Dir upper should prepare seniority list based on position in merit list of the appointment order
 3. It is recommended that the complainant should be adjusted against her designated position. i.e SDM senior drawing master and not on the wrong post of SS-IT.

It is again important to mention here that the ibid recommendations till date have not been honored and implemented.

(Copy of monitoring and evaluation report dated 22-08-2024 is attached as Annexure H)

4. That the impugned seniority lists issued by the respondents is illegal, has no effect upon the Appellant rights and issued in violation of Service rules as well against the principle of natural justice.
5. That the seniority list of DM teachers (Female) for promotion of SDM issued by the respondent No.3 on 31-10-2019, whereby most junior employees become eligible other than the Appellant who are most seniors than the candidates as per age/date of birth and appointment order (the appellants name fall at serial No.4 of the first appointment order), on this score alone the final seniority list is liable to be set aside, most importantly the conduct of the respondents are violation of mandatory provisions of Article 25 and 27 of the Constitution of Islamic Republic of Pakistan, 1973.
6. That the respondents are making pick and choice in respect of promotion policy which is discrimination among the candidates of the department. For ready reference one Mst: Nergis (Serial No.18 of the first appointment order) has been promoted as SDM on 22-05-2022, who is age and merit wise junior from the appellant.
7. That the impugned seniority list and office order dated 23-09-2024 is liable to be set aside/review, because the great injustice has been occurred with the Appellant and her fundamental rights has been violated, due to that the Appellant will suffer irreparable loss in future.
8. That the respondent No.3 deliberately, intentionally, purposefully and illegally placed the name of the most juniors before the name of the Appellant in the impugned seniority list, thus the name of the

Appellant is liable to be placed before the name of all junior candidates.

9. That the Appellant craves leave of this Hon'ble Tribunal to submit additional documents and to raise further points at the time of arguments.

In the light of above and so many other grounds to be advanced at the time of arguments, it is, therefore, humbly prayed that on acceptance of the instant service appeal:

- A. THE OFFICE ORDER NO.3610/. FNO A-17/F/APPEAL/DIR LOWER DATED 23-09-2024 ISSUED BY THE RESPONDENT NO,1 MAY KINDLY BE DECLARED ILLEGAL, VOID AB INITIO UPON THE RIGHTS OF THE APPELLANT.
- B. THE RESPONDENT NO.1 to 3 MAY KINDLY BE DIRECTED TO ISSUE PROMOTION OREDR OF THE APPELALANT AS SENIOR DRAWING MASTER BPS (16) FROM 22-05-2020 INSTEAD OF 30-12-2021 WITH ALL BACK BENEFITS AND SENIORITY.
- C. THE RESPONDENTS MAY KINDLY BE STRICTLY DIRECTED TO IMPLEMENT THE RECOMMENDATIONS SPECIAL DIRECTIVES MADE BY THE PLANNING AND DEVELOPMENT DEPARTMENT GOVERNMENT OF KHYBER PAKHTUNKHUWA (AVAILABLE AT PAGE 30 OF THE INSTANT SERVICE APPEAL)
- D. ANY OTHER REMEDY, WHICH IS JUST, EQUITABLE AND EFFICACIOUS, IN PECULIAR CIRCUMSTANCES OF THE CASE, MAY ALSO BE GRACIOUSLY AWARDED IN FAVOR OF THE APPELLANT AND AGAINST THE RESPONDENTS.

Dated: - 22-10-2024

ملوستان زيبين
Appellant

Through: -

S. P. *
Saifullah

SAIF ULLAH MONGOL (CHITRALI)
 ADVOCATE HIGH COURT
CHITRAL LAW CHAMBER AT SWAT,
 OFFICE NO A-32, FIRST FLOOR SULTAN
 TOWER, MAKANBAGH MINGORA, SWAT
 CONTACT # +92344-1040226 / +92333-8340226
saifmongol@gmail.com

Certificate: -

It is certified that no such like Service Appeal has earlier been filed by the Appellant in this Honorable Tribunal.

ADVOCATE

S. P. *
Saifullah

(7)

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR

Service Appeal No: - /2024

Hajira BibiAppellant

Versus

Director Elementary & Secondary Edu KP & others Respondents

ADDRESSES OF PARTIES

Appellant:

Hajira Bibi D/o Gul Khan R/O Akhgram, Tehsil Wari District Dir Upper
Senior Drawing Master (BPS-10) Government High school Pashta
Elementary and Secondary Education Department District Dir Upper.

RESPONDENTS: -

1. Director Elementary & Secondary Education (E&SE) Khyber Pakhtunkwa Peshawar.
2. Deputy Director (Female) Elementary & Secondary Education (E&SE) Khyber Pakhtunkwa Peshawar.
3. District Education Officer (Female) District Dir Upper.

شکریہ

Dated: - 22-10-2024

Appellant

Through: -

★
Saifullah

SAIF ULLAH MONGOL (CHITRALI)

ADVOCATE HIGH COURT

CHITRAL LAW CHAMBER AT SWAT,

OFFICE NO A-32, FIRST FLOOR SULTAN

TOWER, MAKANBAGH MINGORA, SWAT

CONTACT # +92344-1040226 / +92333-8340226

saifmongol@gmail.com



PII No. 0944-881900,

E-mail: demisdireupper@gmail.com

APPOINTMENT.

Consequent upon recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the post of Drawing Master Female Teachers (DM) School based in BPS-15 (Rs. 8500-700-29500) @ Rs. 8500/- fixed plus usual allowances as admissible under the rules on adhoc basis under the existing policy of the Provincial Government, in Teaching Cadre on the terms and conditions given below with effect from the date of their taking over charge :-

S.#	Name	Father's Name	Merit	Place of Posting	Remarks
01	BAKHT SHAD BEGUM	INAYATULLAH	110.04	GGHSS PANAKOT	A.V.P
02	ROMAN BAHISHT	GUL BAHISHT	91.33	GGHS KOTKAY	A.V.P
03	FARZANA	JEHAN ZAIB	83.63	GGHS KATAN (P)	A.V.P
04	HAIIRA BIBI	GUL KHAN	82.88	GGMS PASHTA	A.V.P
05	SADIA BIBI	SULTAN RAHMAN	82.34	GGHS JABBER	A.V.P
06	BASMIN BANO	SARDAR AAM	82.21	GGHS SHERINGAL	A.V.P
07	NAZIA UMAR	HAJI UMAR MUHAMMAD	81.77	GGMS DARORA	A.V.P
08	BIBI RAHIMA	ABDUL HAQ	80.59	GGMS SHAHIKOT	A.V.P
09	HASHMAT BIBI	AZIZUR RAHMAN	80.59	GGMS JELAR	A.V.P
10	SAJIDA PARVEEN	SHAHZADA KHAN	80.42	GGHS SUNDAL	Dischd quota
11	RAZIA BIBI	SHER BAHADAR	79.31	GGMS GANDIGAR	A.V.P
12	SHAZIA BEGUM	MUHAMMAD DIN	76.93	GGMS AMLOOKNAR	A.V.P
13	MIRHAS BIBI	MUHAMMAD ZAHIR SHAH	74.97	GGMS DOAG (P)	A.V.P
14	RAWASIA	GUL MULA	72.11	GGHSS BARAWAL(B)	A.V.P
15	ALI MAT	MUZAFAR KHAN	71.68	GGMS SUNDRAWAL	A.V.P
16	SHUJAAT BEGUM	MUHAMMAD SHREEN	71.58	GGHS SAMKOOT	A.V.P
17	FARHAT BEGUM	ABDULLAH	71.52	GGMS CHUKYATIN	A.V.P
18	MERGIS	REHMANULLAH	70.77	GGMS DOBANDO	A.V.P
19	TAWHEED BIBI	SHAFAT KHAN	66.23	GGMS PATRAK	A.V.P
20	JURHAT BIBI	MOMIN KHAN	63.03	GGMS DURO	A.V.P

DESD
MD

9

Better Copy.

Appointment Order DM (F) Contract

District Education officer female District Dir Upper



PH No. 0944-881900,
E-mail demisdirupper@gmail.com

APPOINTMENT.

Consequent upon recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the post of Drawing Master Female Teachers (DM) School based in BPS-15 (Rs.8500-700-29500) @ Rs. 8500/- fixed plus usual allowances as admissible under the rules on adhoc basis under the existing policy of the Provincial Government, in Teaching Cadre on the terms and conditions given below with effect from the date of their taking over charge :-

S.#	Name	Father's Name	Merit	Place of Posting	Remarks
01	BAKHT SHAD BEGUM	INAYATULLAH	110.04	GGHSS PANAKOT	A.V.P
02	ROMAN BAHISHT	GUL BAHISHT	91.33	GGHS KOTKAY	A.V.P
03	FARZANA	JELIAN ZAIB	83.63	GGHS KATAN (P)	A.V.P
04	HAJIRA BIBI	GUL KHAN	82.88	GGMS PASHTA	A.V.P
05	SADIA BIBI	SULTAN RAHMAN	82.34	GGHS JABBER	A.V.P
06	BASMIN BANO	SARDAR ALAM	82.21	GGHS SHERINGAL	A.V.P
07	NAZIA UMAR	HAJI UMAR MUHAMMAD	81.77	GGMS DARORA	A.V.P
08	BIBI RAHIMA	ABDUL HAQ	80.59	GGMS SHAHIKOT	A.V.P
09	HASHMAT BIBI	AZIZUR RAHMAN	80.59	GGMS JELAR	A.V.P
10	SAIDA PARVEEN	SHAHZADA KHAN	80.42	GGHS SUNDAL	Disable quota
11	RAZIA BIBI	SHER BAHADAR	79.41	GGMS GANDIGAR	A.V.P
12	SHAZIA BEGUM	MUHAMMAD DIN	76.93	GGMS AMLOOKNAR	A.V.P
13	MINHAS BIBI	MUHAMMAD ZAHIR SHAH	74.97	GGMS DOAG (P)	A.V.P
14	RAWASIA	GUL MULA	72.11	GGHSS BARAWAL(B)	A.V.P
15	ALI MAT	MUZAFAR KHAN	71.68	GGMS SUNDRAWAL	A.V.P
16	SHUJAAT BEGUM	MUHAMMAD SHREEN	71.58	GGHS SAMKOOT	A.V.P
17	FARHAT BEGUM	ABDULLAH	71.52	GGMS CHUKYATIN	A.V.P
18	NERGIS	REHMANULLAH	70.77	GGMS DOBANDO	A.V.P
19	TAWHEED BIBI	SHAFAT KHAN	66.23	GGMS PATRAK	A.V.P
20	JURHAT BIBI	MOMIN KHAN	63.03	GGMS DURO	A.V.P

Appointment Order DM (F) Contract

TERMS & CONDATION

1. NO TA/DA etc is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. Appointment is purely on temporary basis initially for one year.
4. They should not be handed over charge if they exceed 35 years or below 18 years of age.
5. Appointment is subject to the condition that their certificates/degrees must be verified from the concerned authorities if any one found producing bogus Certificate will be reported to the law enforcing agencies for further action.
6. Her services are liable to termination on one month's notice from either side. In case of resignation without notice his one-month pay/allowances shall be forfeited to the Government.
7. Pay will not be made until and unless a certificate from the concerned authority is issued her certificates are verified.
8. They should join their post within 15 days of the issuance of this notification. In case of failure to join their post within 15 days of the issuance of this notification, her appointment will expire automatically and no subsequent appeal etc shall be entertained.
9. Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
10. She will be governed by such rules and regulations as may be issued from time to time by the Gout.
11. Their services shall be terminated at any time, in case of her performance is found unsatisfactory during her contract period. In case of misconduct, she will be proceeded under the rules framed from time to time.
12. Her appointment is made on School based, He/she will have to serve at the place of posting, and His/her service is not transferable to any other station.
13. Before handing over charge once again their document may be checked if they have no required qualifications they may not be handed over charge.
14. No payment will be made so then before making verification from concerned institutions.

(Jehan Muhammad)
 District Education Officer,
 Female dir Upper

Endst: No.1997-2004 / File No.01-A-/DM/Apptt:/DEO(F)/SEB Dated Dir (U) the 30/04/2014.

Copy forwarded for information and necessary action to the: -

1. Director of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Accounts Officer Dir Upper
3. Dy: District Education Officer Female Dir Upper.
4. A.P EMIS Local Office.
5. Head Mistress Concerned.
6. Accountant Concerned.
7. Official Concerned.
8. M/File

[Handwritten Signature]
 District Education Officer,
 Female dir Upper

1564
13/7/03

12/7/03

ATTACHED

The above mentioned
the Rules

15702-8378084-8

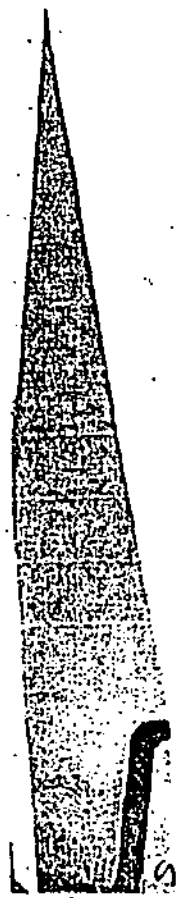
SDM
107/02/03

Assured

Amr/B/SM

107-02/03

Handwritten notes in Urdu script, including a large circular diagram and various lines of text.



Signature

15702-8378084-8

سازمان اسناد و کتابخانه ملی جمهوری اسلامی ایران - مرکز اسناد و کتابخانه ملی
SDM

10/07/023

خطوط هوایی

اسناد و کتابخانه ملی جمهوری اسلامی ایران

اسناد و کتابخانه ملی جمهوری اسلامی ایران - مرکز اسناد و کتابخانه ملی

خطوط هوایی

اسناد و کتابخانه ملی جمهوری اسلامی ایران

خطوط هوایی

اسناد و کتابخانه ملی جمهوری اسلامی ایران

اسناد و کتابخانه ملی جمهوری اسلامی ایران

اسناد و کتابخانه ملی جمهوری اسلامی ایران

اسناد و کتابخانه ملی جمهوری اسلامی ایران

Behter Copy

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) DISTRICT DIR UPPER.
SENIORITY LIST OF DM TEACHERS (FEMALE) FOR PROMOTION OF SDM POST CORRECTED UPTO 31/10/2019

S.N	Name of Teacher	Father's Name	Name of School	Domicile	BPS	Academic qualification	BA Div:	Profe. Qualif	D/O Birth	D/o 1st Appoint. (Edu.Dept)	D/O regular Aptt against the post	D/O Taking over Charge against the post	Remarks
1	Azia Bibi	Sher Zada	GGMS DASKOR	DIR U	15	BA	3RD	DM	19/3/1987	1/12/2013	1/12/2013	1/12/2013	Refusal
2	Jawahira	Arab Said	GGMS SHINKARI	DIR U	15	FA		DM	20/2/1985	1/12/2013	12/1/2013	1/12/2013	Not eligible
3	Shagufta Bibi	Shan Nas Khan	GGMS DASKOR	DIR U	15	BA	3RD	DM	5/6/1986	1/12/2013	12/1/2013	1/12/2013	Refusal
4	Parveen Zeb	Muhammad Dost	GGMS BADALAI	DIR U	15	FA		DM	1/3/1988	1/2/2014	2/1/2014	2/1/2014	Not eligible
5	Roman Bahisht	Gul Bahisht	GGHS WARI P	DIR U	15	MA	1ST	DM	30/12/1989	30/4/2014	30/4/2014	30/4/2014	elegible
6	Sadia Bibi	Sultan Rehman	GGMS BIBYWAR	DIR U	15	MA	2ND	DM	1/9/1988	30/4/2014	30/4/2014	30/4/2014	
7	Sajida Parveen	Shahzada Khan	GGHS SUNDAL	DIR U	15	MA	2ND	DM, Bed	15/12/1980	30/4/2014	30/4/2014	30/4/2014	elegible
8	Shazia Begum	Muhammad Din	GGMS AMLOKNAR	DIR U	15	MA	2ND	DM	14/09/1984	30/4/2014	30/4/2014	30/4/2014	elegible
9	Alimat	Muzafar Khan	GGMS JUGHABANJ	DIR U	15	MA	2ND	DM	1/2/1989	30/4/2014	30/4/2014	30/4/2014	elegible
10	Shujaat Begum	Muhammad Sherin	GGHS CHUKLATAN	DIR U	15	BA	2ND	DM, Bed	1/1/1986	30/4/2014	30/4/2014	30/4/2014	elegible
11	Nargas	Rahmanullah	GGMS DOBANDO	DIR U	15	BA	2ND	DM	22/2/1993	30/4/2014	30/4/2014	30/4/2014	elegible
12	Razia Bibi	Sher Bahadar	GGHSS GANDIGAR	DIR U	15	BA	2ND	DM	15/2/1988	30/4/2014	30/4/2014	2/5/2014	elegible
13	Farzana	Jehan Zeb	GGMS KATTAN	DIR U	15	BA	2ND	DM	4/2/1987	30/4/2014	30/4/2014	2/5/2014	elegible
14	Basmin Bano	Sardar Alam	GGHS SHERINGAL	DIR U	15	MA	2ND	DM	16/9/1987	30/4/2014	30/4/2014	2/5/2014	elegible
15	Bibi Rahima	Abdul-Haq	GGMS KAIRDARA	DIR U	15	BA	2ND	DM	7/10/1979	30/4/2014	30/4/2014	7/5/2014	Refusal
16	Hashmat Bibi	Aziz ur Rahman	GGMS GELAR	DIR U	15	MA	2ND	DM	1/2/1993	30/4/2014	30/4/2014	2/5/2014	Refusal
17	Rawasia	Gul Mulla	GGMS KAKAD	DIR U	15	MA	2ND	DM	3/4/1980	30/4/2014	30/4/2014	2/5/2014	
18	Hajira Bibi	Gul Khan	GGHS AKHAGRAM	DIR U	15	BA	1ST	DM	1/3/1992	30/4/2014	30/4/2014	5/5/2014	
19	Nazia Umar	Muhammad Umar	GGHS DARORA	DIR U	15	MA	2ND	Bed, Med	4/4/1985	30/4/2014	30/4/2014	5/5/2014	elegible
20	Tauheed Bibi	Shafat Khan	GGMS PATRAK	DIR U	15	BA	2ND	DM	8/5/1991	30/4/2014	30/4/2014	5/5/2014	

*Self
copy*

Better Copy

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) DISTRICT DIR UPPER
 SENIORITY LIST OF DM TEACHERS (FEMALE) FOR PROMOTION OF SDM POST CONNECTED UPTO 31/10/2019.

S.N	Name of Teacher	Father's Name	Name of School	Domicle	SPS	Academic Qualify	BA Dnc	Profes Qualif	Q/D BIRTH	Q/D 1st Appoin (Educ/2012)	Q/D regular Appoi (against the post)	Q/D Lacking over charge	Remarks
1	AJIA BIBI	SHER ZADA	GGMS DAZON	Dir U	13	BA	3RD Dnc	DM	19/02/1997	17/12/2013	17/12/2013	17/12/2013	Refusal
2	JAWAHIRA	ARAB SADO	GGMS SHIKARI	Dir U	13	BA	3RD Dnc	DM	20/02/1985	17/12/2013	17/12/2013	17/12/2013	Refusal
3	SHAGUFTA BIBI	SHAI HAS KHAN	GGMS DALAN	Dir U	16	BA	3RD Dnc	DM	26/11/1988	17/12/2013	17/12/2013	17/12/2013	Refusal
4	PARVEEN ZEB	MUHAMMAD DOST	GGMS BADALAI	Dir U	15	BA	3RD Dnc	DM	17/11/1988	17/12/2013	17/12/2013	17/12/2013	Refusal
5	NOYAN BANISHI	EV BANISHI	GGMS WAF P	Dir U	15	BA	3RD Dnc	DM	10/12/1999	10/04/2014	10/04/2014	10/04/2014	Refusal
6	SADIA BIBI	SULTAN RAHMAN	GGMS BIRYAWAR	Dir U	13	BA	3RD Dnc	DM	17/03/1984	10/04/2014	10/04/2014	10/04/2014	Refusal
7	SANDIA PARVEEN	SHAHJADA KHAN	GGMS BUNDAL	Dir U	13	BA	3RD Dnc	DM, BCO	15/12/1980	10/04/2014	10/04/2014	10/04/2014	Refusal
8	SHAZIDA BEGUM	MUHAMMAD QUN	GGMS ANLORAN	Dir U	11	BA	3RD Dnc	DM	14/09/1984	10/04/2014	10/04/2014	10/04/2014	Refusal
9	ALUSAT	KUZAFAR KHAN	GGMS RUGHABATI	Dir U	15	BA	3RD Dnc	DM	17/11/1989	10/04/2014	10/04/2014	10/04/2014	Refusal
10	SHUQAT BEGUM	MUHAMMAD SHIRAN	GGMS CHUKATAN	Dir U	15	BA	3RD Dnc	DM, BFO	17/11/1986	10/04/2014	10/04/2014	10/04/2014	Refusal
11	NARGAZ	RAHMANULLAH	GGMS DOBAIMO	Dir U	16	BA	3RD Dnc	DM	12/02/1993	10/04/2014	10/04/2014	10/04/2014	Refusal
12	RAZIA BIBI	SHER AHMAD	GGMS GANDGAR	Dir U	15	BA	3RD Dnc	DM	15/01/1988	10/04/2014	10/04/2014	10/04/2014	Refusal
13	FARZANA	JEHAN ZEB	GGMS KATTAN	Dir U	13	BA	3RD Dnc	DM	12/11/1987	10/04/2014	10/04/2014	10/04/2014	Refusal
14	BASANTI BANO	SARDAR ALAM	GGMS SHORWAL	Dir U	15	BA	3RD Dnc	DM	16/01/1987	10/04/2014	10/04/2014	10/04/2014	Refusal
15	BIBI RAHMATA	ABDUL HAD	GGMS KATRAHA	Dir U	15	BA	3RD Dnc	DM	22/10/1979	10/04/2014	10/04/2014	10/04/2014	Refusal
16	HASNAT BIBI	ABDUR RAHMAN	GGMS SELAR	Dir U	15	BA	3RD Dnc	DM	17/11/1979	10/04/2014	10/04/2014	10/04/2014	Refusal
17	RAHMATA	SUL KHULA	GGMS KAKO	Dir U	15	BA	3RD Dnc	DM	24/11/1982	10/04/2014	10/04/2014	10/04/2014	Refusal
18	NOYAN BANISHI	EV BANISHI	GGMS ALANAN	Dir U	16	BA	3RD Dnc	DM	15/11/1991	10/04/2014	10/04/2014	10/04/2014	Refusal
19	KHANA KHAN	MUHAMMAD USMAN	GGMS DAZON	Dir U	15	BA	3RD Dnc	DM, Med	17/11/1985	10/04/2014	10/04/2014	10/04/2014	Refusal
20	LAFFICED BIBI	SHAFAT KHAN	GGMS PATRAX	Dir U	13	BA	3RD Dnc	DM	05/11/1991	10/04/2014	10/04/2014	10/04/2014	Refusal

Deferred due to shop
 Deferred due to shop
 Deferred due to shop
 Attested
 District Education Officer
 Female District Dir Upper

① SNo. 03, 06 has been deferred due to non providing of shop paper
 ② SNo. 02 to 10 checked with Service books & Seniority list. According to available Seniority list, SNo. 05, 07, 08, 09 are eligible for promotion.

Attested
 District Education Officer
 Female District Dir Upper

DISTRICT EDUCATION OFFICER (FEMALE)

Dir. Upper (Phone # 0924-889100) E-mail: deo@dirupper@khyber.gov.pk

14

OFFICE ORDER

Consequent upon their promotion from CTs, D.Ms, ATs, PETs BPS-15 to the post (CT), Senior (DM), Senior PET, Senior AT, BPS-16 (Rs. 18910-1520-64510) plus usual on admissible under the rules on regular basis under the existing policy of the Provincial Government terms and conditions given below with immediate effect vide Director, Elementary & Education Khyber Pakhtunkhwa Peshawar Notification Endst No.2293-98/F.No.1/A-17/DFI Dated Peshawar the 21-05-2020 they are hereby further adjusted in the schools noted against immediate effect.

1. CT to Senior Certified Teacher (BPS-16)

S.#	Serial	Name of Teacher	Present School	School where Adjusted	Remarks
1	02	SAEEDA BEGUM	GGHS WARI PAYEEN	GGHS WARI (P)	Promoted to SET BPS-16
2	03	KAWSAR NAZ	GGHS WARI	GGHS WARI	Promoted to SET BPS-16
3	04	HAJUMA SADIYA	GGMS DOOG PAYEEN	GGHS SHEHNAZ	Promoted to SET BPS-16

2. DM to Senior DM (BPS-16)

S.#	Serial	Name of Teacher	Present School	School where Adjusted	Remarks
1	05	ROMAN BAHISHT	GGHS WARI	GGHS WARI	Promoted to SDM BPS-16
2	06	SADIA BIBI	GGMS BIBIYAWAR	GGHS GANDIGAR	Adjusted against SDM BPS-16
3	07	SAJIDA PARVEEN	GGHS SUNDAL	GGMS SUNDAL	Promoted to SDM BPS-16
4	08	SHAZIA BEGUM	GGMS AMLOKHAR	GGHS JAFERKATTI	Promoted to SDM BPS-16
5	09	ALIMAT	GGMS RUGHABANI	GGHS CHAPPER	Promoted to SDM BPS-16
6	10	SHUJAT BEGUM	GGHS CHUKYATIN	GGHS CHUKYATIN	Promoted to SDM BPS-16
7	11	NERGAS	GGMS DOBANDO	GGHS QULANSAI	Promoted to SDM BPS-16

3. PET to Senior PET (BPS-16)

S.#	Serial	Name of Teacher	Present School	School where Adjusted	Remarks
1	01	NAHEED	GGMS DASKORE	GGHS DGGTAI	Promoted to SPET vacant

4. AT to Senior Artific Teacher (BPS-16)

S.#	Serial	Name of Teacher	Present School	School where Adjusted	Remarks
1	01	MIZANAT	GGMS BIBIYAWAR	GGHS CV	Promoted to SAT I vacant

BPS-15 Adjustment

S.#	Serial	Name of Teacher	Present School	School where Adjusted	Remarks
01	0	Razia Bibi DM BPS-15	GGMS Gandigar	GGMS BIBIYAWAR	Adjusted against DM S.A
02	0	Shabnam Bibi DM BPS-15	GGHS Chapper	GGMS RUGHABANI	Adjusted against DM S.P
03	0	Shabnam Begum DM BPS-15	GGHS Qulan Sai	GGMS DOBANDO	Adjusted against DM S.N

TERMS AND CONDITIONS:

- 01- They would be on probation for a period one year extendable for another one year.
- 02- They will be governed by such rules and regulations as may be issued by the government from time to time.
- 03- Their services can be terminated at any time, in case their performance is found unsatisfactory during the case of miss-conduct they will be proceeded under the rules framed from time to time.
- 04- Charge reports should be submitted to all concerned.
- 05- Their seniority on lower post will remain intact.
- 06- No JTA/DA is allowed for joining their new post.
- 07- They will give an undertaking to be recorded in their service books to the effect that if any overpayment in respect of this order will be recovered and if they are wrongly promoted, they will be reversed to the previous post.
- 08- Before handing over charge, their documents may be checked if they don't have the required/relevant records they may not be handed over charge of the post.

(Hussan Ara)

DISTRICT EDUCATION OFFICER
DIR UPPER

Endst No. 135-75 / F.No. 52 / DEO(F)/Estb (S) Dated 21/05/2020

Copy forwarded for information to the

- 01- Director of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
- 02- District Accounts Officer Dir Upper
- 03- Principals/Head Mistresses & In-charge concerned
- 04- Teachers concerned.

[Signature]

Handwritten signature and initials

Sr. No.	Name of Official	Name of School	Date of Birth	Date of Appnt. as	Academic & Professional Qualification	Remarks
1	Nisha	GGHS Bijaypur	07/10/1979	09/06/2004	MA Arabic	Selected based on the deposit of DEO (F) concerned for regular basis with immediate effect.
2	JAMEELA DEQUMI	GGHS Panakot	18/04/1958	19/11/2008	BSC ALANMA	Selected based on the deposit of DEO (F) concerned for regular basis with immediate effect.
3	REHANA	GGHS Pakore	10/11/1993	30/07/2014	MA ISLAMAT	Selected based on the deposit of DEO (F) concerned for regular basis with immediate effect.

61	13 Share of SAT
21	Share of S.A.T
63	Already promoted
94	Available Vacant Post of S.A.Ts
94	Proposed AT for promotion to SAT

TREATY NO.3 PROMOTION OF AT B-15 TO SAT B-16 ON REGULAR BASIS

Sr. No.	Name of Official	Name of School	Date of Birth	Date of Appnt. as	Academic & Professional Qualification	Remarks
1	AZIA	GGHS DASKORE	19/01/1957	04/07/2009	MA/MAI	Selected based on the deposit of DEO (F) concerned for regular basis with immediate effect.
2	FARAZNA	GGHS JUGHANAKI	19/01/1957	03-03-2011	BA/MAI	Selected based on the deposit of DEO (F) concerned for regular basis with immediate effect.
3	HANIRA IMBI	GGHS SHINKARI	19/01/1957	03/07/2009	BA/MAI	Selected based on the deposit of DEO (F) concerned for regular basis with immediate effect.

61	Total No. of Sanction post of DAI
20	1/3rd share of promotion SDM posts
20	Share of SDM
17	Already promoted
63	Available Vacant Post of SDM
93	Proposed DAI for promotion to SDM

Handwritten signature and date: 31/12/21

TREATY NO.2 PROMOTION OF DAI B-15 TO SDM B-16 ON REGULAR BASIS

in pursuance of the Government of Khyber Pakhtunkhwa Elementary & Secondary Education Notification No. SO (B&A/P-18/MS/SS/2012) dated: 14.07.2012 and Finance Department Endorsement No. SO (F&R/P/10-22(G)) 2010 dated: 16.07.2012, the following (7) DAI, AT (Female) are promoted to the post of Senior CF, Senior DAI, Senior AT, Senior BA, Senior AT (Female) respectively, plus usual allowance 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 assisted by the District Education Officer (Female) concerned.

Handwritten signature and date: 31/12/21

In consequence upon the recommendation of the Departmental Promotion Committee and in
 Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
 31/12/2021



3- یہ کہ مورخہ 22/05/2020 کو سائیکل سے جوئیز اور میرٹ پر کم استانیوں کی ترقی SDM پر کروا کر جبکہ سائیکل کی ترقی

متذکرہ SDM پر نہ کروائی گئی / نقل آفس آرڈر محررہ 22/05/2020 لف ہے۔)

4- یہ کہ بعدہ مورخہ 30/12/2021 کو سائیکل کی پروموشن SDM پر ہو کر سابقہ آرڈر مورخہ 22/05/2020 کی رو سے سائیکل کو ترقی نہ ملنے کی بناء سائیکل کافی فوائد حاصل کرنے سے محروم ہوگی۔

5- یہ کہ سائیکل بوجہات ذیل آرڈر محررہ 22/05/2020 سے پروموشن دینے اور اسی تاریخ سے مراعات حاصل کرنے کی خواستگارہ ہے۔

1- یہ کہ آفس آرڈر محررہ 20/05/2020 خلاف قانون و ضابطہ اور خلاف حقائق و خلاف پالیسی محکمہ تعلیم ہے۔

(ii) یہ کہ اسی ہی وقت یعنی مورخہ 22/05/2020 کو سائیکل پروموشن کے لیے اہل تھی لیکن DEO (فی میل) صاحبہ نے سائیکل کی اہلیت کو نظر انداز کر کے میرٹ کی دھجیاں اڑائی ہے۔


(iii) یہ کہ ڈسٹرک ایجوکیشن انسر (فی میل) نے حقائق اور میرٹ کو نظر انداز کر کے 20/05/2020 کو سائیکل کی ترقی نہیں کروائی گئی۔

(iv) یہ کہ ڈسٹرک ایجوکیشن آفسر اور سٹاف نے ہمیں اندھیرے میں رکھی گئی۔ اور محکمہ تعلیم کے رولز اور ریگولیشن کے تحت پروموشن من سائیکل کی قانوناً حق بنتی تھی لیکن DEO نے ایسا نہیں کیا۔

v- یہ کہ دوسری منظور نظر استانی کو راستہ ہموار کرنے کے لیے میری پروموشن لیٹ کر دی گئی جو کہ میں آٹو گرام کی رہنے والی ہوں اسی وجہ سے میری ٹرانسفر دور دراز علاقے میں کر دی اور میں روزانہ تقریباً 22 کلومیٹر آنے جانے کا سفر طے کرتی ہوں۔ جس کی وجہ سے میں کافی مشکلات سے دوچار ہوں

(vi) یہ کہ من سائیکل کی پروموشن SDM.16 پر آرڈر محررہ 22-05-2020 سے منظور کر کے اسی تاریخ سے جملہ مراعات دینا ضروری اور قرین انصاف ہے۔

(vii) یہ کہ مورخہ 18-9-2023 پر DEO نے صاف انکاری جواب دینے پر اپیل ہذا دائر کرنے کی ضرورت لاحق ہوئی۔



18

بجالات بالا استدعا ہے کہ بہ منظوری اپیل ہذا من سائیکل کی پر دوشن 16 SDM از مورخہ 22/05/2020 سے کرنے اور اسی تاریخ سے جملہ مراعات دینے کے احکامات صادر فرمائیں۔

المرقوم: 2/10/2023

العارض

حاجرہ بی بی دختر گل خان زوجہ فرمان علی سکند آنگرام تحصیل واڑی ضلع دیر بالا

بیان حلفی

حلفاً بیان کرتی ہوں کہ جملہ مراتبات بالا تاحد میری علم و یقین کے مطابق درست ہے۔
اور میں نے کوئی راز مخفی یا پوشیدہ نہیں رکھی ہے۔

العبد



حاجرہ بی بی

0319-7440825

کاپی برائے ضروری کارروائی:

1- سیکرٹری ایجوکیشن KPK بمقام پشاور

2- صوبائی وزیر تعلیم KPK بمقام پشاور

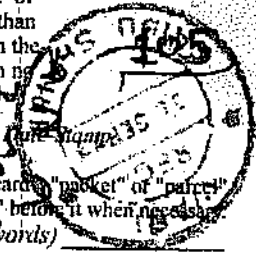
3- گورنر KPK بمقام پشاور

4- ڈپٹی کمشنر ضلع دیر بالا

Handwritten signature and stamp.

813 For insurance RGL 117410300 se. Rs. Ps.
Stamps affixed except in case of
uninsured letters of not more than
the initial weight prescribed in the
Post Office Guide or on which no
acknowledgement is due.

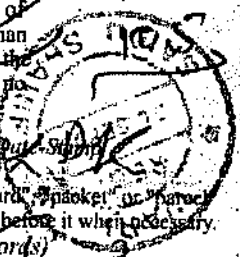
Received a registered letter addressed to _____
Date Stamp _____
*Write here "letter", "postcard", "packet" or "parcel"
with the word "insured" before it when necessary.
Insured for Rs. (in figures) _____ (in words) _____



Insurance fee Rs. _____ Ps. _____ (in words) } Weight } Kilo
Name and address of sender } Grams

0. 814 For insurance Notices see reverse. Rs. Ps.
Stamps affixed except in case of
uninsured letters of not more than
the initial weight prescribed in the
Post Office Guide or on which no
acknowledgement is due.

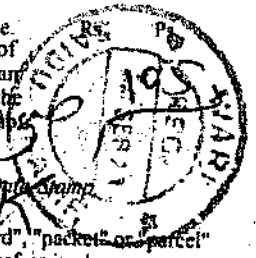
Received a registered letter addressed to _____
Date Stamp _____
*Write here "letter", "postcard", "packet" or "parcel"
with the word "insured" before it when necessary.
Insured for Rs. (in figures) _____ (in words) _____



Insurance fee Rs. _____ Ps. _____ (in words) } Weight } Kilo
Name and address of sender } Grams

No. 815 For insurance Notices see reverse. Rs. Ps.
Stamps affixed except in case of
uninsured letters of not more than
the initial weight prescribed in the
Post Office Guide or on which no
acknowledgement is due.

Received a registered letter addressed to _____
Date Stamp _____
*Write here "letter", "postcard", "packet" or "parcel"
with the word "insured" before it when necessary.
Insured for Rs. (in figures) _____ (in words) _____



Insurance fee Rs. _____ Ps. _____ (in words) } Weight } Kilo
Name and address of sender } Grams

me

ATTSTED

20

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION,
KHYBER PAKHTUNKHWA, PESHAWAR

No. 7790 / P.No. A-17/appeal/Dir Upper

Dated Peshawar the 23/10 /2023

To

The District Education Officer,
(Female) Dir Upper

Subject:- APPEAL

Memo:

I am directed to refer to the subject cited above and to enclose herewith a copy of appeal no Ms. Hajra Bibi, SDM GGPS Panshal Dir Upper and to ask you to submit detail report views/comments to this Directorate to proceed further into the matter.

Assistant Director (Female)
E&SE Khyber Pakhtunkhwa.

Handwritten signature and date: 20/10/23

Assistant Director (Female)
E&SE Khyber Pakhtunkhwa.

Enclst No.

Copy of the above is forwarded to the:

- 1. PA to Director E&SE KPK Peshawar.

Handwritten signature
ATTN

(21)



OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE DIR UPPER

EMAIL: deofdirupper@gmail.com

Phone 0924-881900



3

No. 2566 /F. No. /ADO(5)/DEO(F) Dir Upper

Dated: 20/02/2023

To

The Assistant Director (Female),
Directorate of E&SE Khyber Pakhtunkhwa,
Peshawar

Subject REPORT REGARDING HAJIRA BIBI, SDM, GGHS PASHTA DIR UPPER.

Reference your office letter No 2391/F; No: A-17/F/Appeal dated 05/01/2024 regarding the promotion appeal of Hajira Bibi, SDM GGHS Pashta. Brief History of the case is as under -

1. It is stated that Hajira Bibi was initially appointed as a DM at GGMS Pashta through NTS school-based policy, vide the office No 1997-2004 dated 30/04/2014
2. Subsequently, the services of all school-based employees were regularized by the Provincial Government
3. This office submitted the promotion file from DM to SDM to the worthy Director E&SE Peshawar. The seniority list was prepared on the basis from date of taking over charge and medical certificate as well from MS concerned. While Hajira Bibi was not considered for promotion at that time, as per approval of the competent authority vide approval No 2293-98 dated 21/5/2020. (copy attached).
4. However, Hajira Bibi was promoted later on to the SDM post by the Directorate vide No 7286-90 dated 31/12/2021. (Copy attached).
5. Currently, the applicant has filed an appeal seeking promotion from 2020. It is crucial to highlight that it is impractical to revert the promotion of another teacher and promote Hajira Bibi on the basis of a promotion that occurred in 2020. Additionally, her seniority has been prepared on a score basis in accordance with the directions issued on 05/01/2024

Given the circumstances mentioned above, it's important to acknowledge that this office is not authorized to promote or reverse any teacher, particularly those in the BPS-16 category, while some un-necessary litigation can also be expected, if the order of 2020 is reversed and the depriving teacher shall also challenge the same at any stage. Therefore, kindly request your esteemed office to resolve this matter on Directorate level.

[Handwritten signature]

ATTSTED

[Handwritten signature]

DISTRICT EDUCATION OFFICER
(FEMALE) DISTRICT DIR UPPER

mt

Assistant Director (Female)
E&SE Khyber Pakhtunkhwa

Chairman, the

Assistant Director (Female)
E&SE Khyber Pakhtunkhwa

... be maintained on score base & according to appointment
... the issued order of priority and after commencement
... 177/2021 on the 20/11/2021

~~REPLY REGARDING JAJRA BHI, SDI GUS PASITA DIR~~

The ... Education Officer
... Upper

Dated Peshawar the ... /2021

No. ... /177/Appeal/Dt Upper

DIRECTORATE OF PRIMARY & SECONDARY EDUCATION
PESHAWAR

22

2

**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR**

NOTIFICATION

Consequent upon approval of the Competent Authority, Mr. Shamin Ahmad B-19 DEO (Female) District Swat is hereby nominated as equity officer to probe into the matter as per attached letter DEO (Female) Dir Upper wide No. 2566 dated 20.07.2021.

The inquiry officer should submit detail inquiry report alongwith clear findings recommendations within 15 days positively to this Directorate for further necessary action please.

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

345-54

At No. 117/A Upper District Peshawar the 20/07/2021

Mst. Shamin Ahmad B-19 DEO (Female) District Swat (R.G.S) (C.O.)
District Education Officer (I) Upper District Peshawar to assist and provide the relevant records in the inquiry officer concerned.
District Director, Khyber Pakhtunkhwa Peshawar

24



OFFICE OF THE
DISTRICT EDUCATION OFFICER(F)
SAWABI



No. DEO/Inquiry DEO(F) Dir Upper 31/8/24
Dated : 2-123/ /2024


To,

DIRECTOR
Elementary & Secondary Education,
KP Peshawar.


Subject; INQUIRY REPORT IN CONNECTION WITH NOTIFICATION UNDER
ENDSTT: NO. 3245-47 DATED 30.5.2024 IN THE CASE OF MST. HAJIRA BIBI SDM
GGHS PASHAT DIR UPPER

Memo;

Enclosed please find herewith inquiry report in the case of Mst. Hajira Bibi SDM GGHS Pashat Dir Upper, comprising of 03 pages along with 41 relevant annexures (1-41 pages) and submitted for further course of action, please.


(DR. SHAMIM AKHTAR)
INQUIRY OFFICER
DISTRICT EDUCATION OFFICER(F) SWAT
NOW DEO(SAWABI)

19/10


ATTSTED

1339
3-8-2024

(25)

Amear
N F Y

FACTS FINDING INQUIRY REPORT

Dr. Shanim Akhtar
District Education Officer(F) Swat
Now DEO(F) Sawabi
Inquiry Officer

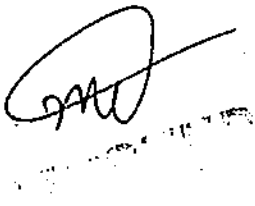
Venue/Date
DEO(F) Dir Upper Office
20.7.2024

Submitted On.
20.8.2024

Complainant/Appellant
Hajira Bibi SDM GGHS Pashua

INDEX

SH	Description of documents	Annexures	Pages
1	Appointment order	A	1-2
2	Charge report	B	3
3	Medical Certificate	C	4
4	Inquiry report/reply of DEO(F) Dir Upper dated 14.11.2023	D	5
5	Notification working Paper Promotion dated 21.5.2020	E	6-8
6	Office order of Roman Bahist & others dated 22.5.2020	F	9
7	Working paper for promotion of Complainant dated 30.9.2024	G	10-15
8	Notification of adjustment of complainant as SDM dated 31.12.2021	H	16-19
9	Office Order of Complainant as SDM dated 31.12.2021	I	20-21
10	Appeal of Complainant to Director dated 2.10.2023	J	22-23
11	Appeal of Complainant to Deputy commissioner dated 2.10.2023	K	24-26
12	Reply of DEO(F) Dir Upper to Assistant Director E&SE	L	27
13	Reply of DEO(F) Dir Upper to DC Dir Upper	M	28
14	Reply of DEO(F) Dir Upper to Assistant Director E&SE	N	29
15	Notification of Inquiry	O	30
16	Letter to DEO(F) Dir Upper for Provision of record dated 11.6.2024	P	31
17	Reminder dated 1.7.2024	Q	32
18	Inquiry schedule dated 10.7.2024	R	33
19	Seniority list DM upto 31.10.2019	S	34
20	Statement of Sahib zada Ihtishamullah Senior Clerk	T	35
21	Statement of Muhd Ibrahim Senior Clerk.	U	36
22	Statement of Complainant, Hajira Bibi SDM	V	37-40
23	Statement of DEO(F) Dir Upper Hussan Ara	W	41



DR. SHANIM AKHTAR
Inquiry Officer

(26)

FACTS FINDING INQUIRY REPORT

Dr. Shamim Akhtar
District Education Officer(F) Swat
Now DEO(F) Sawabi
Inquiry Officer

Venue/Date
DEO(F) Dir Upper Office
20.7.2024

Submitted On.
20.8.2024

Complainant/Appellant
Hajira Bibi SDM GGHS Pashla

Brief of the Case.

1. Ms. Hajira Bibi D/O Gul Khan W/O Farman Ali R/O Akhagram Tehsil Warai District Dir Upper, appointed on 30.4.2014 as DM and posted at GOMS Pashla. (Annexure-A) She took Over Charge on 5.5.2014 (Annexure-B) and medically examined on 8.5.2014 (Annexure-C). As Per report of DEO(F) Dir Upper vide No.1143 dated 14.11.2023, addressed to Assistant Director M&E (Annexure-D) that in the year 2019 seniority list was prepared on the basis of date of Taking Over Charge and merit, the appellant was on S.No.18. In the year 2020, DPC was held on 21.5.2020 (Annexure-E) for Promotion to SCT, SDM, SPET & SAT in which the following teachers were included according to their seniority:
 1. Roman Balisht (Sty.No.5) GGHS Wari.
 2. Sadia Bibi (Sty.No.6) GGHS Ghandighar
 3. Sajida Parveen (Sty.No.7). GGHS Sundal.
 4. Shalizia Begum (Sty.No.8) GGHS Jahanbatai.
 5. Alimat (Sty.No.9) GGHS Chapper.
 6. Shujaat Begum (Sty.No.10) GGHS Chukyatanr.
 7. Narges (Sty.No.11) GGHS Qulandi.
2. Office order of SDM, issued on 22.5.2020 (Annexure-F) but the complainant neither challenged the office order nor seniority within the stipulated time according to Rule-3 of the Khyber Pakhtunkhwa Civil servants (Appeal) Rules, 1986 read with Section-22 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 .
3. Another DPC for Promotion to the Post of SCT, SDM, STT and SAT was held on 30.9.2020 and minutes issued on 31.12.2021, complainant was included according to her seniority and was considered for promotion by DPC and service of the appellant/complainant was placed on the disposal of DEO (F) for further order (Annexure-G) and notification issued on 31.12.2021 (Annexure-H). Subsequently the appellant/complainant adjustment order issued on 31.12.2021 and took over charge without any objection and accepted the TOR's of the order (Annexure-I).
4. The appellant easily accepted the promotion order according to her own wishes but after laps of 03 Year & 05 Months submitted appeal to Director Education dated 2.10.2023 (Annexure-J) & Deputy Commissioner (Annexure-K) and the same replied by DEO(F) Dir Upper to Director E&SE Vide No.2566 dated 20.2.2023 (Annexure-L) , replied to Deputy Commissioner vide No.2012 dated 8.01.2024 (Annexure-M) ,replied to Assistant Director E &SE KP Peshawar vide No.1727 dated 22.2.2023 (Annexure-N)
5. The District Education Officer (F) Dir Upper replied to all forum where the complainant approached and filed appeal that "she was not eligible for Promotion on 22.5.2020 as per seniority list during that time". Further the DEO(F) Dir Upper stated that she has never filed any appeal in this office during that time and she has been promoted on her own turn and seniority".
6. That keeping in view report of DEO(F) Dir Upper vide No.2566 dated 20.2.2023 (Already appended as annexure-L), nominated the undersigned as inquiry officer vide Notification under Endstt; No.3245-47 /F.No. A-17/Appeal/Dir Upper Pesh the 30.5.2024 (Annexure-O)

(27)

Recital Steps

To know about the factual controversy in the light of Prevailing laws and Rules pertaining to the Seniority & Appeal Rules, the following steps followed for fair, transparent and impartial inquiry.

- Under Rule-12 of E&D Rules, 2011 DEO(F) Dir Upper was informed and requested vide No.5129 dated 11.6.2024 (Annexure-P) for production of record and further reminder vide No.5614 dated 1.7.2024 (Annexure-Q)
- b) Inquiry was scheduled and sent to DEO(F) Dir Upper vide No.5846 dated 10.7.2024 (Annexure-R) and requested for attendance of the relevant officials as respondents for their Examination and statements in written for investigation including the complainant under the ibid rules.
- c) Reasonable opportunity to complainant as well as respondents were provided to record their statement.

Investigative Resources.

For effective and independent investigation to inquire the matter, the following resources were followed:

- Review of documents/record.
- Discussion/hearing of respondent & complainant.
- Statement of respondent & Complainant.
- Relevant Rules /Instructions of the high-ups regarding Seniority & Appeal Rules.
- Personal Experiences and case studies regarding such like matter.

Review of documents/Record.

According to the rules as enshrined in E&D Rules-2011, the following documents, Provided by DEO(F) Dir Upper as well as the complainant, were reviewed.

S#	Description of documents	Attachment
1	Appointment order	Received, already appended as Annexure-A
2	Charge report	Received, already appended as Annexure-B
3	Medical Certificate	Received, already appended as Annexure-C
4	Inquiry report/reply of DEO(F) Dir Upper dated 14.11.2023	Received, already appended as Annexure-D
5	Notification working Paper Promotion dated 21.5.2020	Received, already appended as Annexure-E
6	Office order of Roman Dahist & others dated 22.5.2020	Received, already appended as Annexure-F
7	Working paper for promotion of Complainant dated 30.9.2024	Received, already appended as Annexure-G
8	Notification of adjustment of complainant as SDM dated 31.12.2021	Received, already appended as Annexure-H
9	Office Order of Complainant as SDM dated 31.12.2021	Received, already appended as Annexure-I
10	Appeal of Complainant to Director dated 2.10.2023	Received, already appended as Annexure-J
11	Appeal of Complainant to Director dated 2.10.2023	Received, already appended as Annexure-K
12	Reply of DEO(F) Dir Upper to Assistant Director E&SE	Received, already appended as Annexure-L
13	Reply of DEO(F) Dir Upper to DC Dir Upper	Received, already appended as Annexure-M
14	Reply of DEO(F) Dir Upper to Assistant Director E&SE	Received, already appended as Annexure-N
15	Seniority list DM upto 31.10.2019	Received, already appended as Annexure-S

Statement & Hearing of respondent.

S#	Name of Respondent	Reply	Remarks
1	Sahib zada Husainmullah Senior	Complainant filed appeal on 2.10.2023 and the same is badly barred by time. (Annexure-T)	Appeal of the appellant/complainant is badly barred by time and not maintainable in the eyes of law.

2	Muhal Ibrahim Senior Clerk.	Complainant filed appeal on 2.10.2023 and the same is badly barred by time. (Annexure-U)	Appeal is barred by time and not maintainable according to appeal rules.
3	Hajira Bibi SDM	I was unaware from my Promotion for Two Years. Juniors have been promoted in the year 2020 and I am deserving for Promotion from 2020. (Annex-V)	Replies of DEO(F) Dir Upper are very much clear that the complainant is not deserving for Promotion of 2020 and she has been promoted on her own turn and seniority.
4	Hussan Ara DEO(F) Dir Upper	The complainant was promoted on 31.12.2021 according to her seniority and her own turn. Moreover, she did not submit appeal within the stipulated period (Annexure-W).	Appeal of the complainant is badly barred by time and not maintainable in the eye of law.

Key Findings.

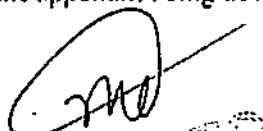
- The complainant failed to file appeal regarding the promotion of teachers, promoted in the year 2020 and remained silent.
- Appeal is badly barred by time and could not meet the appeal rules. Hence not maintainable in the eye of law.
- Complainant filed appeal after laps of 03 Year & 05 Months which is against the service rules and verdicts of the superior courts regarding seniority.
- The Procedures adopted by the complainant for her promotion wef 2020, is not fair and against the prevailing laws and service rules. It is also settled principle of law that "when law required a thing to be done in a specific manner then doing of that thin in any other manner was illegal (2020 PLC(CS) 413. hence appeal in the present circumstances after laps of 03 years & 05 Months are infructuous.

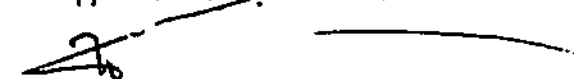
Conclusion.

- Appeal is against the appeal rules and not maintainable in the eye of law being devoid of merit.
- Appellant/Complainant has been promoted according to her seniority and on her own turn.
- Complainant is not deserving for promotion to SDM from 2020 due to the reason that she was junior than the others who promoted in the year 2020 which has been confirmed and verified by the DEO(F) Dir Upper.
- Complainant failed to prove her case for promotion from the year 2020.
- Complainant accepted Tors of her promotion dated 31.12.2021, therefore, at this juncture for her Promotion from 2020, her claim became infructuous and against the prevailing rules.

Recommendations.

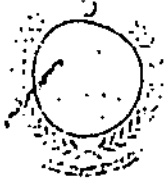
Appeal of the appellant being devoid of merit and against the appeal rules, may be struck down.


DATED


DR. SIAMIM AKHTAR
Inquiry Officer

29

Amexure
"G"



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR

No. 3610 /F/No.A-17/F/Appeal/Dir Lower

Dated Peshawar the 23/09/2024

To

The District Education Officer,
(Female) Dir Upper

Subject: INQUIRY REPORT

Memorandum

I am directed to refer to the subject cited above and to enclose herewith a copy of inquiry report in respect of DR. Shamim Akhtar B-19 DFO Female Swat (Inquiry Officer) and to ask you that appeal for promotion from DM to SDM of Mst. Hajira bibi SDM GGHS Pashat Dir Upper is struck down according to the recommendation of Inquiry report.

Deputy Director (Female)
E&SE Khyber Pakhtunkhwa

Encl No.

Copy of the above is forwarded to the:

1. The Section officer (Primary/F) E&SE Department, Govt of Khyber Pakhtunkhwa w/r to his letter No. SO (P/F) E&SED/DPC/Promotion DM to SDM/2024 dated 19.8.2024.
2. PA to Director E&SE KPK Peshawar.

Deputy Director (Female)
E&SE Khyber Pakhtunkhwa

Asst Secy
14/09/2024

ATTACHED

6/22/24, 4:44 PM

M&E Report

30

Amexime
H y



MONITORING & EVALUATION SYSTEM

PLANNING AND DEVELOPMENT DEPARTMENT

GOVERNMENT OF KHYBER PAKHTUNKHWA

MONITORING & EVALUATION REPORT

Report Type: Special Directives

Title: Inquiry regarding "To probe irregularities in the promotion Of female drawing masters to senior drawing maslers (DM to §DM) in the seniority list in the education department of dir upper.

Reference: In reference to the letter No. P&D/M&E/complaint#146/2023-24/3261-63 dated 11th October, 2023 received to Divisional Monitoring Office Malakand Division which highlights "Appeal Against Promotion and Seniority List of Education Department District Dir Upper". In response, the Deputy Director M&E System Malakand Division, Swat has directed to this office to investigate the matter in light of the received complaint.
In pursuance to the above directives, the District Monitoring and Evaluation (M&E) Team held a meeting with the District Education Officer (Female) Dir Upper, reference a letter No. P&D/M&E/ADM/DIR(L) 2023-24/9 dated 3rd November 2023 regarding the Inquiry to probe irregularities in promotion/seniority of DM to SDM.
The report is based on relevant data/documents shared by the concerned staff of the Education Department.

	Sector	Sub Sector	District
	Elementary & Secondary Education		Dir (Upper)
Report	New		
Reporting Officer Name / Designation		Fawad Ali / AMO Social	
Sponsoring Department	Elementary & Secondary Education		
Executing Department	Elementary & Secondary Education		
Date of Visit	25-07-2024		
Financial Progress (%)	0		

Fawad Ali

Physical progress as observed at site (%)	0								
Technical Sanction	<table border="1"> <thead> <tr> <th>Technical Sanctions</th> <th>TS Amount</th> <th>TS Approval date</th> <th>TS Sanctioning Authority</th> </tr> </thead> <tbody> <tr> <td></td> <td>0.000</td> <td></td> <td></td> </tr> </tbody> </table>	Technical Sanctions	TS Amount	TS Approval date	TS Sanctioning Authority		0.000		
Technical Sanctions	TS Amount	TS Approval date	TS Sanctioning Authority						
	0.000								
Observation Type	YTD								


Any Other Finding/Issues

Methodology:

A detailed review was done on existing promotion policies and guidelines to understand the criteria and procedures. Analysis of promotion-related data such as applications, seniority lists, and departmental promotion committee working papers was conducted to identify discrepancies. Interviews were conducted with applicants and department officials for further insights.

Key Findings/Analysis:

1. All the candidates were appointed on the same date according to the appointment order for DM (Female) on dated 30/04/2014 (as shown in the annexure 1 below).
2. The merit order of the promoted candidates, which was prepared on the basis of "date taking overcharge", was issued by the departmental selection committee of District Education Office Dir Upper (As shown in the annexure 2 below).
3. Merit order of the complainant (Hajra Bibi) is no-04 as per appointment order and in seniority list the candidate was on s.no 18. However the aforementioned complainant was not included in the promotion list (dated 21-5-2020) duly prepared by departmental promotion committee. (As shown in the annexure 3 below).
4. As per the official of the education department, the departmental promotion list is prepared on the basis of seniority which is prepared on date of taking over charge. However it is pertinent to mention here that the department could not provide any rules/document to validate their promotion list based on date of taking overcharge.
5. Later on, the complainant was promoted from DM to SDM on the 30th of December, 2021, and was posted at GGHS Pashla. According to the statement of the District Education Officer (DEO) and the letter shared by the department, the complainant informed the higher authorities that the location of her posting was far from her home. As a result, she was reassigned to GGHS Akhagram on the wrong post of SS-IT (as depicted in annexure 4 below).


 15/05/2022

Recommendations

1. The department could not provide any rules/document to validate their promotion list based on date of taking overcharge. It is therefore recommended that the education department should justify their position regarding validity of seniority list duly prepared on the basis of taking over charge.
2. It is recommended that the education department of district Dir Upper should prepared seniority list based on position in merit list of the appointment order.
3. It is recommended that the complainant should be adjusted against her designated position i.e SDM senior drawing master and not on the wrong post of SS-IT.
4. For the antedated promotion and back benefits for the said period of the complainant it is recommended that for further clarification, guidance may please be sought from the concerned department (finance & Education).

Conclusion:

The findings of this report highlight significant ambiguities in the promotion of DM to SDM female teachers within the education department. It is imperative for the department to address these issues promptly and implement the recommended measures to restore fairness, transparency, and integrity in the promotion process.

Joint Order DIT (F) Conference

District Education officer female District Dir Upper

PII No. 0933-MH/9999
E-mail: dte@dirupper.gov.pk



APPOINTMENT

Consequent upon recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the post of Drawing Master Female Teachers (DM) School based in DIT-10 (10,8000-704-0000) @ No. 8 post. Fixed plus usual allowances as admissible under the rules on entire basis under the existing policy of the Provincial Government, in Teaching Cadre on the terms and conditions given below with effect from the date of their taking over charge:-

Sr	Name	Matric Name	Grade	Place of Posting	Remarks
01	SAKHT SHAH BROUM	INAYAT ULLAH	11.01	GCMS PANAKOT	A.V.P
02	NOMAN GAHIGHT	GET. HAFITHI	11.03	GCMS KUTRAY	A.V.P
03	PAREANA	JISHAN ZAH	11.05	GCMS KATAN III	A.V.P
04	NAIRAN BIBI	QULNAN	11.06	GCMS PAKTA	A.V.P
05	SADIA NIDI	KULIAS KALIAN	11.07	GCMS JADEN	A.V.P
06	BASMIN ILANO	KALIBAL KHAN	11.08	GCMS SHERINCAL	A.V.P
07	NAZIA UMAR	HAFIZAH SHEHNAZ	11.09	GCMS DARGHA	A.V.P
08	BIBI HANIMA	AUDUN HAN	11.10	GCMS SHARIQAT	A.V.P
09	HASHMAT BIBI	ZIYAN HUSSAN	11.11	GCMS JELAN	A.V.P
10	SABQA HARVEEN	HISTAZA KHAN	11.12	GCMS SUNDAL	Discontinue
11	GAZIA BIBI	KHUR KHAN	11.13	GCMS GANDIGAN	A.V.P
12	SHAZIA BEGUM	STOKAN LAD DIN	11.14	GCMS AMLOGANAH	A.V.P
13	MINTAS BIBI	STOKAN LAD GOL MUSA	11.15	GCMS BOAG III	A.V.P
14	ILWASTA	GOL MUSA	11.16	GCMS BARAWALIDI	A.V.P
15	ALI FATY	STOKAN LAD KHAN	11.17	GCMS SUNDRAWAL	A.V.P
16	UMMAYYAH BEGUM	STOKAN LAD KHALID KHAN	11.18	GCMS SAMROOT	A.V.P
17	FARHAT BEGUM	STOKAN LAD KHALID KHAN	11.19	GCMS CHUKRYATIN	A.V.P
18	MENID	STOKAN LAD KHALID KHAN	11.20	GCMS DOBARAND	A.V.P
19	YASNEED BIBI	STOKAN LAD KHALID KHAN	11.21	GCMS PAKTA	A.V.P
20	FURHAY BIBI	KHUNIS KHAN	11.22	GCMS DUKO	A.V.P

Annexure 1

[Handwritten signature]
Date: _____

Dr. Farooq Khan
15 Advisor to Chief
For Elementary
Director of Education

Handwritten signature and text at the top right.

Director of Education
Handwritten text in Urdu script, including the acronym 'SDM'.

Handwritten text at the bottom of the main body.

Handwritten signature and text in the bottom right corner.

Handwritten text at the very bottom of the page.

34

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) DISTRICT DIR UPPER.
 SENIORITY LIST OF SDM TEACHERS (FEMALE) FOR PROMOTION OF SST POST CORRECTED UPTO 31/07/2021.

Sr	Name of Teacher	Father's Name	Name of School	Domicle	Age	Academic Qualification	BA Divi	Profes Qualif	D/O Birth	D/O 1st Appoin Educ Deptt	D/O regular Appoin against the post	D/O taking over charge against the post	Remarks
1	Nasima Bibi	Muhammad Ali Khan	GGHSS Dir	Dir U	16	MA	2nd Division	B.Ed	10-03-64	01-08-86	28-02-13	28-02-13	
2	Nasreen Bibi	Abdullah	GGHS Kotkai	Dir U	16	MA	2nd Division	B.Ed	01-03-83	03-02-09	17-12-14	17-12-14	
3	Arfeen	Fateh Muhammad	GGHS Panakot	Dir U	16	MA	2nd Division	DM	01-01-24	03-02-09	17-12-14	02-12-14	
4	Satma Bibi	Shah Faisal	GGHSS Warl	Dir U	16	MA	2nd Division	B.Ed	06-02-67	03-02-07	17-12-14	17-12-14	
5	Shagufta	Muhammad Rafiq	GGHS Barawal	Dir U	16	MA	3rd Division	DM	21-03-89	03-02-09	17-12-14	17-12-14	
6	Jameeth	Tawokal Khan	GGHS Bibywar	Dir U	16	MA	1st Division	B.Ed	05-01-82	01-01-03	22-07-25	22-07-25	
7	Romza bakhsh	Gul Bahsh	GGHS Warl p	Dir U	16	MA	1st Divi	DM	10/12/1989	10/04/2014	22-05-20	22-05-20	
8	SADIA BIBI	SULTAN RAHMAN	GGHSS Gandigar	Dir U	16	MA	2nd Divi	DM	02-01-85	10/04/2014	22-05-20	22-05-20	
9	SAJIDA PARVEEN	SHAHZADA KHAN	GGHS SUHDAL	Dir U	16	MA	2nd Divi	DM, BEd	15/12/1980	10/04/2014	22-05-20	22-05-20	
10	SHAZIA BEGUM	MUHAMMAD QUR	GGHS Janbhatti	Dir U	16	MA	2nd Divi	DM	14/09/1984	10/04/2014	22-05-20	22-05-20	
11	ALIMAT	MUZAFAR KHAN	GGHS Chopper	Dir U	16	MA	2nd Divi	DM, BEd, MEd	01-01-89	10/04/2014	22-05-20	22-05-20	
12	SHUJAT BEGUM	MUHAMMAD SHERIF	GGHS CHUKATARI	Dir U	16	BA	2nd Divi	DM, BEd	01-01-80	10/04/2014	22-05-20	22-05-20	
13	MARGAS	RAHMANULLAH	GGHS Gulandi	Dir U	16	MA	2nd Divi	DM, BEd	27/07/1981	10/04/2014	22-05-20	22-05-20	
14	JAWAHIRA	ARAB SAID	GGHS Akhagam	Dir U	16	BA	2nd Divi	DM, BA	20/02/1985	01-12-13	06-12-13	01-12-13	

Scanned with CamScanner

District Education Officer
 Female Dir Upper
 9/08/2021

23

hw



35

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

Dir Upper (Phone # 0944-221900) E-mail: deofdirupper@gov.punjab.com

OFFICE ORDER.

Consequent upon their promotion from ATs, TTs and DMs to the post of Senior (AT), (TT) and (DM) BPS- 16 (Rs. 18910-1520-64510) 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 vide Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar Notification Endst No. 8739-44/ F.No.1/A-17/DPC-2021/KPK Dated: Peshawar the 24-01-2021 they are hereby further adjusted in the schools noted against their each names with immediate effect.

ATs to SATs BPS- 16

4-1-2021

S.#	S.#	Name of Teacher	Present School	School where Adjusted	Remarks
1	03	Aisha Bibi	GGMS Kattan	GGHS Darora	A.V. Post
2	04	Asla	GGMS Jughabanj	GGHS Gogyal	A.V. Post
3	05	Shagufta Begum	GGHS Chukiatan	GGHS Chukiatan	Already occupied the SAT Post
4	06	Ulfat Bahar	GGHS Chapper	GGHS Chapper	Already occupied the SAT Post
5	07	Shakeela	GGHS Qulandi	GGHS Qulandi	Already occupied the SAT Post
6	6	Iram	GGMS Mashango	GGHS Shahikot	A.V. Post
7	11	Farhat	GGMS Daskore	GGHS Warl	Subject to the condition creation of new post
8	12	Rashida	GGMS Tarpatar	GGHS Sundal	A.V. Post

TTs to STTs BPS- 16

S.#	S.#	Name of Teacher	Present School	School where Adjusted	Remarks
01	05	Aisha,	GGMS Dobando	GGHS Qulandi	A.V. Post
02	07	Sema Kausar	GGMS Mian Banda	GGHS Darora	A.V. Post
03	08	Sabln Begum	GGMS Mashango Kass	GGHS Barawal	A.V. Post

DM to SDM BPS- 16

S.#	S.#	Name of Teacher	Present School	School where Adjusted	Remarks
01	01	Jawahira	GGMS Shinkari	GGHS Akhagram	A.V. Post

Consequential Adjustment:

Note: The following adjustment is being made as the teachers concerned occupying wrong post of BPS-16

01	Fozja Bibi, AT BPS 15	GGHS Darora	GGMS Payeen Kattan	Vice No,1 in AT Promotion Order
02	Shehnaz Bibi AT BPS 15	GGHS Shahikot	GGMS Mashango Kass	Vice No:06 In At Promotion Order
03	Khurshid Talat, TT BPS 15	GGHS Qulandi	GGMS Dobando	Vice No, 1 in TT Promotion Order
04	Samina Alam, TT BPS 15	GGHS Darora	GGMS Mian Banda	Vice No 02 in TT Promotion Order
05	Hajira Bibi DM BPS 15	GGHS Akhagram	GGMS Shinkari	Vice No 01 in DM Promotion Order

04/1/2021 - 05/1/2021

[Signature]

(36)

بخدمت جناب ڈائریکٹر مائیکرو اینڈ سول سیکرٹریٹ خیبر پختونخواہ بمقام پشاور

(Petitioner)

حاجہ بی بی دختر گل کان زوجہ فرمان علی سکندہ انگرام تحصیل واڑی دیر بالا۔

بنام

(Respondents)

1. ڈسٹرکٹ ایجوکیشن افسر (فی میل) محکمہ ایجوکیشن دیر بالا بمقام دیر خاص۔

2. صادیہ بی بی دختر سلطان رحمان

3. ساجدہ پروین دختر شہزاد خان

4. شازیہ بیگم دختر محمد دین

5. علت دختر مظفر خان

6. شوکت بیگم دختر محمد شیرین

7. زگش دختر رحمان اللہ۔

محکمہ ایمل

ایمل برخلاف / پروموشن آرڈر محرمہ 22/05/2020 جس کی رو سے سائلہ کی ترقی غیر قانونی طور پر روکو
اگر جو تیر استانی کو ترقی دے دی گئی تھی۔

استدعائے ایمل

یہ کہ بمستوری ایمل ہذا سائلہ کی ترقی / پروموشن آرڈر محرمہ 20/05/2020 سے منظور / تصور کیا جا کر
سائلہ کو اسی تاریخ سے جملہ مراعات دینے کے احکامات صادر فرمائی جاویں۔

جناب عالی! سائلہ ذیل عرض پر دانا ہے۔

1. یہ کہ سائلہ ڈرائنگ ماسٹر BPS-15 کی آسامی پر سکول Based پالیسی کے تحت بروئے Appointment

order مورخہ 30/04/2014 کو گورنمنٹ گرنزہائی سکول پاشتا میں بھرتی ہو کر سکول متذکرہ میں اپنی

فرائض کی سرانجام دہی کی خاطر چارج سنبھال لی۔

(Appointment order مورخہ 30/04/2014 لف ہے۔)

Dir (Social)
M/E System
11/10/23

DD (social)
11/10/23

TESTED
ME

(37)

2. یہ کہ سالکہ Appointment order مورخہ 30/04/2014 میں میرٹ لیسٹ پر میرٹ کے بناید پر بہ

سرٹل نمبر 4 درج ہے۔ اور ریسائٹیشن نمبر 7 تا 2 سرٹل نمبر 5,6,12,15,16,18 پر سے اور ریسائٹیشن نمبر 2 تا

7 کو SDM پوسٹ پر پروموشن دی گئی ہے۔

3. یہ کہ مورخہ 22/05/2020 کو سالکہ سے جو نیز اور میرٹ پر کم استانیوں کی ترقی SDM پر کروا کر جبکہ سالکہ

کی ترقی متذکرہ SDM پر نہ کروائی گئی / نقل آفس آرڈر محررہ 22/05/2020 لف ہے۔

4. یہ کہ بعد مورخہ 30/12/2021 کو سالکہ کی پروموشن SDM پر ہو کر سابقہ آرڈر مورخہ 22/05/2020

کی رو سے سالکہ کو ترقی نہ ملنے کی بناء سالکہ کافی فوائد حاصل کرنے سے محروم ہو گئی۔

5. یہ کہ سالکہ بوجوہات ذیل آرڈر محررہ 22/05/2020 سے پروموشن دینے اور اسی تاریخ سے مراعات حاصل

کرنے کی خواستگار ہے۔

(1) یہ کہ آفس آرڈر محررہ 20/05/2020 خلاف قانون و ضابطہ اور خلاف حقائق و خلاف پالیسی محکمہ
تعلیم ہے۔

(2) یہ کہ اسی ہی وقت یعنی مورخہ 22/05/2020 کو سالکہ پروموشن کے لیے اہل تھی لیکن DEO (نی)

میل) صاحبہ نے سالکہ کی اہلیت کو نظر انداز کر کے میرٹ کی دھجیاں ارائی ہے۔

(3) یہ کہ ڈسٹرکٹ ایجوکیشن افسر (نی) نے حقائق اور میرٹ کو نظر انداز کر کے 20/05/2020 کو

سالکہ کی ترقی نہیں کروائی گئی۔

(4) یہ کہ ڈسٹرکٹ ایجوکیشن افسر اور سٹاف نے ہمیں اندھیرے میں رکھی گئی۔ اور محکمہ تعلیم کے رولز و

ریگولیشن کے تحت پروموشن من سالکہ کی قانوناً حق بنتی تھی لیکن DEO نے ایسا نہیں کی۔

(5) یہ کہ دوسری منظور نظر استانی کو راستہ ہموار کرنے کے لیے میری پروموشن لیٹ کر دی گئی جو کہ میں

آٹھ رام کی رہنے والی ہوں اسی وجہ سے میری ترانسفر دور دراز علاقے میں کر دی اور میں روزانہ تقریباً 22

کلومیٹر آنے جانے کا سفر طے کرتی ہوں جس کی وجہ سے میں کافی مشکلات سے دوچار ہوں۔

ATTEN
AMU

(6) یہ کہ من ساکنہ کی پروموشن SDM.16 پر آرڈر محررہ 22/05/2020 سے منظور کر کے اسی تاریخ سے جملہ مراحت دینا ضروری اور قرین انصاف ہے۔

(7) یہ کہ مورخہ 18-09-2023 پر DEO نے صاف انکاری جواب دینے پر اپیل ہذا دائر کرنے کی ضرورت لاحق ہوئی۔

(8) یہ کہ ساکنہ نے مورخہ 10-07-2023 کو ڈسٹرکٹ ایجوکیشن آفس دیر بالا میں DEO صاحبہ کو سنارٹی لیسٹ حاصل کرنے کیلئے درخواست دے رکھی ہے مگر آج تک نہ تو سنارٹی لیسٹ دیا اور نہ کہ درخواست واپس کیا جو کہ سراسر زیادتی ظلم اور بدعتی کو ظاہر کرتا ہے۔
(درخواست برائے سنارٹی لیسٹ کی کاپی لف ہے)۔

بحالات بالا استدعا ہے کہ منظور کی اپیل ہذا من ساکنہ کی پروموشن SDM.16 مورخہ 22/05/2020 سے کرنے اور اسی تاریخ سے جملہ مراعات دینے کے احکامات صادر فرمائیں۔
المرقوم: 11/10/2023

العارض

حاجرہ بی بی دختر گل خان زوجہ فرمان علی سکنہ آگلرام تحصیل واڑی ضلع دیر بالا

بیان حلفی!

حلفاً بیان کرتی ہوں کہ جملہ مراتب بالا
تاحد میری علم و یقین کے مطابق درست
ہے۔ اور میں نے کوئی راز مخفی یا پوشیدہ نہیں
رکھی ہے۔

العبد

حاجرہ بی بی بادشاہ حسین دیر بالا

03197440825

ATTESTED
MAA

39



GOVERNMENT OF KHYBER PAKHTUNKHWA
PLANNING AND DEVELOPMENT DEPARTMENT
MONITORING AND EVALUATION SYSTEM

No. P&D M&E (S&C)/P&D/01/01/16/17/17-26
Dated Peshawar 22/02/2017

To,

The Secretary to Government of Khyber Pakhtunkhwa
Elementary and Secondary Education Department, Peshawar.

Subject: INQUIRY REPORT REGARDING "INQUIRY TO PROBE
IRREGULARITIES IN THE PROMOTION OF FEMALE DRAWING
MASTERS TO SENIOR DRAWING MASTERS (DM TO SDM) IN THE
SENIORITY LIST EDUCATION DEPARTMENT DIR UPPER.

Dear Sir,

I am directed to refer to the subject cited above and call your attention to the inquiry report based on a complaint. The report can be viewed on <https://dms.khyberpakhtunkhwa.gov.pk>.

The recommendation in the report may be viewed and an internal inquiry may be initiated. In light of such inquiry, measures/actions taken may be conveyed to the DGI M&E office for record, please.

Moreover, para-wise replies to the recommendations of the M&E report may be submitted within 15 days.

Assistant Monitoring Officer (Social-I)

Copy to the:

1. Chief (Edn), P&D for information.
2. District Education Officer Female Upper Dir for information.
3. Director (Social), P&D Department for information.
4. Deputy Director, Divisional M&E Office Malakand for information.
5. Deputy Director (IT), M&E, P&D Department for information.
6. P.S to the Additional Chief Secretary, Khyber Pakhtunkhwa.
7. P.A to Director General (M&E), P&D Department, Peshawar.

Assistant Monitoring Officer (Social-I)

(40)

NOTICE UNDER RULE 11 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL RULES 1974 FOR FILLING OF SERVICE APPEAL.

To

1. Director Elementary & Secondary Education (E&SE) Khyber Pakhtunkwa Peshawar.
2. Deputy Director (Female) Elementary & Secondary Education (E&SE) Khyber Pakhtunkwa Peshawar.
3. District Education Officer (Female) District Dir Upper.
4. Director Planning and development department Government of Khyber Pakhtunkwa at Peshawar (Monitoring & evaluation system)

Respected Sir

Please take notice that I am going to file a Service Appeal before the Honorable Khyber Pakhtunkwa Services Tribunal, Peshawar against the impugned OFFICE ORDER NO.3610/. FNO A-17/F/APPEAL/DIR LOWER DATED 23-09-2024 ISSUED BY THE RESPONDENT NO,1 as well against the final seniority list of SDM by which the Appellant has been deprived of her promotion as SDM from 22-05-2022.

Dated: - 22-10-2024

بیتاہ مسنون
Appellant

Through: -

SAIF ULLAH MONGOL

SAIF ULLAH MONGOL (CHITRALI)

ADVOCATE HIGH COURT

CHITRAL LAW CHAMBER AT SWAT,

OFFICE NO A-32, FIRST FLOOR SULTAN

TOWER, MAKANBAGH MINGORA, SWAT

CONTACT # +92344-1040226 / +92333-8340226

saifmongol@gmail.com

بعدالت

جناب حیدر نختو خواجہ سروس ٹریڈنگ پرائیویٹ لمیٹڈ

2024ء منجانب

حاجہ بی بی بنام حکومت

bc-15-6081

CNIC: 15202-3777187-5

موزونہ
مقدمہ
دعوی
جیم

باعث تحریر آئندہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کمال کارروائی متعلقہ
آن مقام ۱۴۲۱ھ سروس ٹریڈنگ پرائیویٹ لمیٹڈ سے سید اللہ منگل ATTC
مقرر کرنے کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کمال کارروائی کا کمال اختیار دیا گیا۔ نیز
دیکل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دیے جواب دہی اور اقبال دعویٰ اور
بمسورت ڈگری کرنے اجراء اور وصولی چیک دروپیہ از عرضی دعویٰ اور درخواست ہر قسم کی تقدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برآمدگی اور منسوخ
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کمال یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو ہمیشی وہی جملہ مذکورہ بااختیارات حاصل ہوں گے اور اس کا ساتھ
پرداختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ درجہ التوائے مقدمہ کے سبب سے ہوگا۔
کوئی تاوان پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکورہ کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

الرقوم ۲۱
ماہ اکتوبر 2024

Attested
and accepted by

Sayyid
Mansoor
ATTC

Sayyid
Mansoor
ATTC

بادشاہ حسین
2024
بادشاہ حسین ولد قدیر خان (قونیا خان)
CNIC = 15702-4638594-1
Contact # 0319-7440825