

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. 7042/2021

Date of Institution ... 13.07.2021

Date of Decision ... 31.01.2022

Mst. Noor Afshan D/o Abdul Hameed Subject Specialist (English) Govt. Girls Centennial Model Higher Secondary School No. 1 Haripur.

... (Appellant)

**VERSUS**

Chief Secretary Government of Khyber Pakhtunkhwa Peshawar and others

... (Respondents)

Roeeda Khan,  
Advocate

... For Appellant

Noor Zaman Khattak,  
District Attorney

... For respondents

**AHMAD SULTAN TAREEN**  
**ATIQU-UR-REHMAN WAZIR**

...  
...

**CHAIRMAN**  
**MEMBER (EXECUTIVE)**

**JUDGMENT**

**ATIQU-UR-REHMAN WAZIR MEMBER (E):-** Brief facts of the case are

that the appellant was initially appointed as SST BPS-16 on 30-05-2012. During the course of her service, the appellant was promoted to BPS-17 vide order dated 13-04-2018 and was posted at GGHS Gulshan abad Swabi and subsequently transferred to GGHSS Hathar Haripur vide order dated 15-04-219. After completing normal tenure and due to her personal issues, the appellant requested for transfer to a nearest station, which was accepted and the appellant was transferred against the newly up-graded and vacant post in Government Girls Centennial Model Higher Secondary School (GGCMHSS) No. 1 Haripur vide order dated 08-06-2021. The appellant reported arrival at her place of transfer and

assumed the charge. In the meanwhile, respondent No. 2 issued another order of even number dated 09-06-2021, whereby respondent No. 5 was also transferred at the same station, where the appellant was transferred. Yet another order dated 10-06-2021 was issued, which was again corrected as 09-06-2021, whereby the posting order of the appellant dated 08-06-2021 was withdrawn, against which the appellant filed departmental appeal dated 11-06-2021, which was rejected vide order dated 23-06-2021. In the drawl order dated 09-06-2021 and 10-06-2021 one of colleague of the appellant namely Naheed Mubarak was again transferred to the same station i.e. from GGHSS Beer Haripur to GGCMHS Haripur No. 1 on 08-07-2021, but the appellant was ignored, hence the appellant filed the instant service appeal with prayers that the impugned cancellation order of transfer dated 10-06-2021 and 09-06-2021 may be set aside and the order dated 08-06-2021 of the appellant may be restored alongwith all consequential benefits.

02. Learned counsel for the appellant has contended that the appellant has not been treated in accordance with law, hence her rights secured and guaranteed under the Constitution has badly been violated; that the impugned orders are wrong, illegal, unlawful and is liable to be struck down and set aside; that it is the cherished principle of law that where a law requires a thing to be done in a particular manner, then the same is to be done in that manner and not otherwise; that the respondents has violated posting/transfer policy of the provincial government.

03. Learned District Attorney for the respondents has contended that the appellant was transferred vide order dated 08-06-2021 but in the said notification an alternate teacher/substitute was not provided to the school, from where the appellant was transferred, due to which students at her previous station badly suffered, hence the said notification was withdrawn; that the said transfer notification dated 08-06-2021 was withdrawn from the date of issue, hence relinquish of charge and arrival report of the appellant carry no meanings; that

the transfer order dated 08-06-2021 was withdrawn vide order dated 09-06-2021, hence regular attendance of the appellant in that school is astonishing; that departmental appeal of the appellant was rejected being devoid of merit; that another teacher was posted in place of the appellant in exigency of service in order to save the precious time of the students.

04. We have heard learned counsel for the appellant and have perused the record.

05. Record reveals that the appellant was posted at GGHSS Hathar Haripur vide order dated 15-04-2019, where she completed her normal tenure and was transferred on her request to GGCMHSS No 1 Haripur vide order dated 08-06-2021 and in compliance, the appellant reported arrival on 09-06-2021, but the respondents issued another parallel transfer order dated 09-06-2021, whereby respondent No 5 was also transferred against the post, which was already filled by the appellant and on the same day two parallel orders dated 09-06-2021 and 10-06-2021 were issued and transfer order dated 08-06-2021 was withdrawn.

06. We have observed that the appellant was discriminated to the effect that she was transferred to a nearest station on her own request after long time and just after her transfer order, the said order was withdrawn and respondent No 5 was posted against such post, which however was not warranted as the appellant reported arrival and started performing her duty, thus developed a vested right over the post. The appellant was also discriminated to the effect that transfer of another teacher namely Naheed Mubarak was also withdrawn in the said withdrawal order but her transfer was again restored vide order dated 08-07-2021 but case of the appellant was ignored despite her departmental appeal. Malafide of the respondents is evident from the fact that respondent No 5 was transferred vide order dated 24-01-2020 to Khanpur Haripur and again from Khanpur to Kangra Haripur vide order dated 08-09-2020 and again from Kangra to the present school vide order dated 09-06-2021, which shows favoritism on


part of the respondents and undue favor extended to respondents No 5. Moreover, the transfer order of the appellant was pre-maturely cancelled, so the respondents violated Clause-I and iv of the posting/transfer policy notified by the provincial government read with letter of the establishment department dated 27-02-2013 pertaining to posting/transfer.


07. We are of the considered view that the impugned withdrawal order was made on malafide on part of the respondents, administrative expediencies and without taking into consideration the tenure of the officer at the place of her posting, hence is illegal, unlawful and not tenable in the eye of law and is liable to be struck down.

08. As a sequel to the above discussion, the impugned order dated 09.06.2021 bearing No. SO(S/F) E&SED/4-16/2020/TC/BS-17 to the extent of transfer of respondent No. 5 and the other order of even date bearing No. SO(S/F) E&SED/4-16/2020/TC/BS-18,17 and of the same number dated 10.06.2021 regarding withdrawal of notification dated 08.06.2021 to the extent of appellant are set aside. Consequently, the transfer order dated 08.06.2021 bearing No. SO(S/F) E&SED/4-16/2020/TC/BS-18,17 is restored to the extent of appellant. In consequence of the cancellation of transfer order dated 09.06.2021 to the extent of respondent No. 5 and restoration of the order dated 08.06.2021 to the extent of transfer of appellant, the former shall remain posted as it is in GGHSS Kangra Colony Haripur and the later shall remain posted as it is in GGCMHSS No. 1 Haripur. The appeal stands disposed of accordingly. Parties are left to bear their own costs. File be consigned to record room.

ANNOUNCED

31.01.2022

  
(AHMAD SULTAN TAREEN)  
CHAIRMAN


  
(ATIQU-UR-REHMAN WAZIR)  
MEMBER (E)

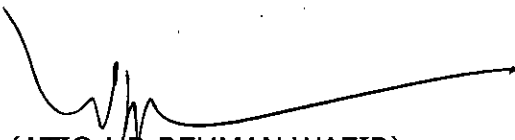
ORDER  
31.01.2022

Learned counsel for the appellant present. Mr. Noor Zaman Khattak, District Attorney for respondents present. Arguments heard and record perused.

Vide our detailed judgment of today, separately placed on file, the impugned order dated 09.06.2021 bearing No. SO(S/F) E&SED/4-16/2020/TC/BS-17 to the extent of transfer of respondent No. 5 and the other order of even date bearing No. SO(S/F) E&SED/4-16/2020/TC/BS-18,17 and of the same number dated 10.06.2021 regarding withdrawal of notification dated 08.06.2021 to the extent of appellant are set aside. Consequently, the transfer order dated 08.06.2021 bearing No. SO(S/F) E&SED/4-16/2020/TC/BS-18,17 is restored to the extent of appellant. In consequence of the cancellation of transfer order dated 09.06.2021 to the extent of respondent No. 5 and restoration of the order dated 08.06.2021 to the extent of transfer of appellant, the former shall remain posted as it is in GGHSS Kangra Colony Haripur and the later shall remain posted as it is in GGCMHSS No. 1 Haripur. The appeal stands disposed of accordingly. Parties are left to bear their own costs. File be consigned to record room.

ANNOUNCED  
31.01.2022

  
(AHMAD SULTAN TAREEN)  
CHAIRMAN

  
(ATIQ-UR-REHMAN WAZIR)  
MEMBER (E)

22.11.2021


Proper D.B. is not available, therefore, case is adjourned to ~~22.12.2021~~ for the same.

  
READER

22.12.2021

Counsel for the appellant and Mr. Muhammad Adeel Butt, Addl. AG alongwith Faheemullah, S.O (Litigation) for official respondents present. None present on behalf of private respondent No. 5.

Learned AAG seeks adjournment for want of preparation of the case. Even otherwise, effective service of notice on respondent No. 5 is required for attending the proceedings, before passing any appropriate order, if she does not turn up. Therefore, the appellant is directed to furnish the registered envelop alongwith AD card for sending notice to respondent No. 5. To come up for arguments on 10.01.2022 before the D.B.

  
(Atiqur Rehman Wazir)  
Member(E)

  
Chairman

10.01.2022

Learned counsel for the appellant present. Mr. Noor Zaman Khattak, District Attorney for respondents present.

Due to non-availability of Hon'able Member (J), the case could not be heard. Adjourned. To come up for arguments on ~~31.01.2022~~ 01.2022 before D.B.

  
(MIAN MUHAMMAD)  
MEMBER (E)

20.10.2021

Counsel for the appellant present.

Mr. Kabirullah Khattak, Additional Advocate General alongwith Syed Naseer-ud-Din Assistant for respondents present. Nemo for private respondent No.5.

Reply/comments on behalf of respondents No. 1 & 2 submitted which is placed on file. Learned counsel for the appellant requested for adjournment; granted. To come up for arguments on 11.11.2021 before D.B.



(ATIQ UR REHMAN WAZIR)  
MEMBER (E)

(ROZINA REHMAN)  
MEMBER (J)


11.11.2021

Appellant alongwith her counsel Ms. Roeda Khan, Advocate; present. Mr. Noor Zaman Khattak, District Attorney for official respondents present.

Due to paucity of court time, arguments could not be heard. Adjourned. To come up for arguments on 22.11.2021 before the D.B.



(Atiq-Ur-Rehman Wazir)  
Member (E)



(Salah-Ud-Din)  
Member (J)

Stipulated period passed reply not submitted.

15.09.2021


Learned Addl, A.G be reminded about the omission and for submission of reply/comments within extended time of 10 days.

  
Chairman

21.09.2021

Counsel for the appellant and Mr. Muhammad Adeel Butt, Addl. AG alongwith Saleem Khan, SO and for the respondents No. 1, 2, 3 and 4 present. Nemo for respondent No. 5.

Reply/comments have not been submitted by the respondents despite extension of time vide order dated 15.09.2021. Let them file the reply/comments on or before the next date, failing which their right for submission of reply/comments shall be deemed as struck off. Fresh notice be issued to respondent No. 5. Case to come up on 20.10.2021 before the available D.B.

  
(Rozina Rehman)  
Member (J)

  
Chairman



09.08.2021

Counsel for the appellant present. Pre-admission notices have not been issued by the office. Preliminary arguments heard.

Points raised need consideration. The appeal is admitted for full hearing, subject to all just and legal objections including that of limitation for determination during full hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 21.09.2021 before the D.B.

Appellant Deposited  
Security & Process Fee

9/8/21



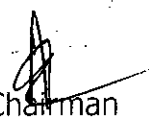
  
Chairman

Form- A

FORM OF ORDER SHEET

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

Case No.- 7042 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	13/07/2021	<p>The appeal of Mst. Noor Afshan presented today by Roeeda Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR,</p>
2-		<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>30/07/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
	30.07.2021	<p>Counsel for the appellant present. Pre-admission notice be issued to respondents as well as learned AAG. To come up for preliminary hearing on 09.08.2021 before S.B.</p> <p style="text-align: right;"> Chairman</p>

**BEFORE THE HON'BLE SERVICE TRIBUNAL**  
**PESHAWAR**

In Re S.A No. \_\_\_\_\_/2021

Mst. Noor Afshan

***VERSUS***

Chief Secretary Govt. of KPK Peshawar & others

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5.	Copy of the notification dated 08.06.2021	"B"	12
6.	Copies of arrival reports; charge relinquish report & charge assumption report	"C", "D" & "E"	13 To 15
7.	Copy of attendance register	"F"	16
8.	Copy of notification dated 09.06.2021	"G"	17
9.	Copies of the office order dated 10.06.2021 and 09.06.2021	"H & I"	18 To 19
10.	Copies of departmental and rejection order	"J&K"	20 To 22
11.	Copy of transfer order	"L"	23
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13.	Wakalatnama		

(Noor Afshan)  
APPELLANT

Through

(Roeeda Khan)  
Roeeda Khan

Advocate, High Court  
Peshawar.

Dated: 12/07/2020

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**BEFORE THE HON'BLE SERVICE TRIBUNAL**

**PESHAWAR**

**Khyber Pakhtunkhwa  
Service Tribunal**

In Re S.A No. 7042/2021

Diary No. 7243

Dated 13-7-2021

Mst. Noor Afshan D/o Abdul Hameed subject specialist  
(English) Govt. Girls Centennial Model Higher  
Secondary School No.1, Haripur.

**Appellant**

**VERSUS**

1. Chief Secretary Govt. of KPK Peshawar.
2. Government of Khyber Pakhtunkhwa through  
Secretary Elementary & Secondary Education,  
Khyber Pakhtunkhwa Peshawar.
3. Director Elementary & Secondary Education, Khyber  
Pakhtunkhwa Peshawar.
4. District Education Officer (Female), Haripur.
5. Mst. Fasiha Malik Subject specialist (English), Govt.  
Girls Centennial Model Higher Secondary School  
Kangra Colony, Haripur.

**Respondents**

**Filed to-day**

**Registrar**

13/7/2021

**SERVICE APPEAL U/S-4 OF THE KHYBER  
PAKHTUNKHWA SERVICES TRIBUNAL ACT 1974  
AGAINST THE ORDER DATED 10/06/2021 &  
09.06.2021 WHEREBY THE TRANSFERRED  
ORDER DATED 08.06.2020 OF THE APPELLANT  
HAS BEEN CANCELLED WITHOUT ANY REASON  
BEING VIOLATED THE POSTING TRANSFER  
POLICY AGAINST WHICH THE APPELLANT  
FILED DEPARTMENTAL APPEAL ON 11.06.2021  
WHICH HAS BEEN REJECTED ON 23.06.2021 ON  
NO GOOD GROUNDS.**

Prayer:-

ON ACCEPTANCE OF THIS SERVICE APPEAL THE IMPUGNED CANCELATION ORDER OF TRANSFER DATED 10/06/2021 & 09/06/2021 MAY VERY KINDLY BE SET ASIDE AND THE ORDER DATED 08.06.2021 OF THE APPELLANT MAY KINDLY BE RESTORED ALONG WITH ALL BACK BENEFITS.

Respectfully Sheweth,

1. That the appellant has been initially appointed SST BPS-16 on 30.05.2012 through Public Service Commission and had been performing her duty as SST English.
2. That after appointment the appellant performed her duty with full devotion and hard work and no complaint whatsoever has been made against the appellant.
3. That the appellant has been promoted from SST BPS-16 to SS English PBS-17 on 13.04.2018 and was posted as GGHS Gulshan Abad Manaeri District Swabi and thereafter, vide office order bearing No. SO(S&F)E&SE/4-16/2019/Revised/Adjustment dated 15.04.2019 was transferred & posted in Govt, Girls Higher

Secondary School Hattar District Haripur.  
(Copy of office order dated 15.04.2019 is attached as annexure "A").

4. That after completing normal tenure and due to some health & domestic problems, the petitioner requested to respondents for her transfer to a nearest Station, where upon respondent No.2 was gracious enough to issue notification bearing No. SO(S/F)E&SED/4-16/2020/TC/BC-18, 17 dated 08.06.2021 whereby the petitioner was transferred and posted against vacant post in newly upgraded school i.e. GGCMHSS No.1 Haripur.(Copy of the notification dated 08.06.2021 is attached as annexure "B").
5. That in consequence of the notification, the petitioner relinquish the charge from Govt. Girls Higher Secondary School Hattar and assumed the charge in GGCMHSS, No.1 Haripur and also submitted her arrival report, (Copies of arrival reports, charge relinquish report & charge assumption report are attached as annexure "C", "D" & "E").
6. That petitioner is regularly attending her duties in the said school and her attendance is duly marked in the attendance register. (Copy

W

of attendance register is attached as Annexure "F").

7. That to the utter surprise of petitioner, respondents No.2 issued another application of even number dated 09.06.2021, whereby respondent No.5 have been transferred/posting at the same station. It is worth to mention here that, there is no mentioned about the petitioner as to whether she will remain in the same school or respondent No.4 has been posted and transferred in addition to the petitioner. (Copy of notification dated 09.06.2021 is attached as Annexure "G").

8. That as the respondent No.2 under political pressure and in order to please some blue eyed person of his choice has issued the illegal and unlawful order leaving legal as well as factual lacuna, therefore, another office order of even number dated 10.06.2021 and later on same order was issued by changing the date as 09.06.2021 to cure their mistake whereby, the posting order of petitioner dated 08.06.2021 has been withdrawn. (Copies of the office order dated 10.06.2021 and 09.06.2021 are attached as Annexure "H&I").

9. That the appellant submitted departmental appeal on 11.06.2021 against the impugned

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order which has been rejected on 23.06.2021.  
(Copies of departmental and rejection order are attached as annexure "J & K").

10. That in the withdrawn order dated 09.06.2021 and 10.06.2021 one of the colleagues of the appellant namely Naheed Mubarak again has been transferred in the same station i.e from GGHSS Beer Hari Pur to GGCMHS Hari Pur No.1 Hari Pur on 08.07.2021 so discrimination has been committed by the respondent department. (Copy of transfer order is attached as annexure "L").

11. That the political pressure and approach of the respondent No.5 has been clarified from the transfer order dated 24.01.2020, 08.09.2020 and 09.06.2021 whereby the respondent No.5 has been transferred to her most nearest stations. (Copies of transfer orders are attached as annexure "M" "N" & "O").

12. That feeling aggrieved the Appellant prefers the instant service appeal before this Hon'ble Tribunal on the following grounds inter alia:-

**GROUND:-**

A. That the appellant has not been treated in accordance with law and hence his rights



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secured and guaranteed under the Constitution of 1973 were badly violated.

B. That the impugned office order is wrong, illegal, unlawful and is liable to be struck down and set aside.

C. That it is cherished principle of law, that where a law require a thing to be done in a particular manner, then the same is be done in that manner and not otherwise.

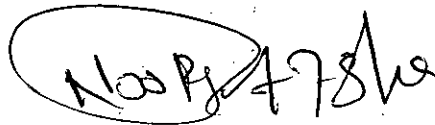
D. That the respondent department has been violated transfer/posting policy of the Provincial Government.

E. That the appellant seeks the permission of this Hon'ble Court to rely on additional grounds at the hearing of this appeal.

*It is therefore, most humbly prayed that on acceptance of this Service Appeal the impugned cancelation order of transfer dated 10/06/2021 & 09/06/2021 may very kindly be set aside and the order dated 08.06.2021 of the appellant may kindly be restored along with all back benefits.*

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*Any other relief not specifically asked for  
may also graciously be extended in favour of  
the Appellant in the circumstances of the case.*



APPELLANT

Through



**Roeda Khan**

Advocate, High Court

Peshawar.

Dated: 12/07/2021

**NOTE:-**

As per information furnished by my client, no such like appeal for the same petitioner, upon the same subject matter has earlier been filed, prior to the instant one, before this Hon'ble Tribunal.



**Advocate.**

(8)

**BEFORE THE HON'BLE SERVICE TRIBUNAL**  
**PESHAWAR**

In Re S.A No. \_\_\_\_\_/2021


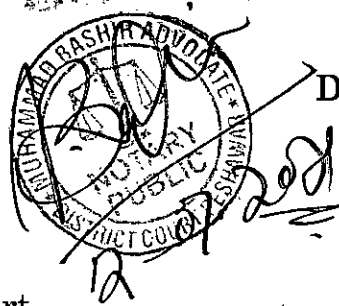
Mst. Noor Afshan

***VERSUS***

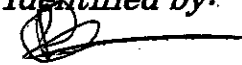
Chief Secretary Govt. of KPK Peshawar & others

**AFFIDAVIT**

I, Mst. Noor Afshan D/o Abdul Hameed subject specialist (English) Govt. Girls Centennial Model Higher Secondary School No.1, Haripur, do hereby solemnly affirm and declare that all the contents of the instant appeal are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Court.

ATTESTED  
  
DEPONENT  


Identified by:

  
**Roeda Khan**  
Advocate High Court  
Peshawar.

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**BEFORE THE HON'BLE SERVICE TRIBUNAL**  
**PESHAWAR**

In Re S.A No. \_\_\_\_\_/2021

Mst. Noor Afshan

***VERSUS***

Chief Secretary Govt. of KPK Peshawar & others

**ADDRESSES OF PARTIES**

***PETITIONER.***


Mst. Noor Afshan D/o Abdul Hameed subject specialist (English) Govt. Girls Centennial Model Higher Secondary School No.1, Haripur.

**ADDRESSES OF RESPONDENTS**

1. Chief Secretary Govt. of KPK Peshawar.
2. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar.
3. Director Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar.
4. District Education Officer (Female), Haripur.
5. Mst. Fasiha Malik Subject specialist (English), Govt. Girls Centennial Model Higher Secondary School Kangra Colony, Haripur.

  
APPELLANT

Through

  
**Roeda Khan**  
Advocate, High Court  
Peshawar.

Dated: 12/07/2020



**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
**ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT**  
 Block-"A", Opposite MPA's Hostel, Civil Secretariat Peshawar  
 Phone: 091-9210480, Fax # 091-9211419

Dated Peshawar the April 15<sup>th</sup>, 2019

**NOTIFICATION**

No. SO(S/F)E&SED/4-16/2019/Revised/Adjustments: Consequent upon the approval of Competent Authority; the following revised adjustments are hereby ordered against the mentioned posts in the public interest with immediate effect:

S#	Name, Designation & Previous Station	Under Transfer As	Re-Adjustment As	Remarks
1	Nuzhat Jabeen D/O Muhammad Saeed Ur Rehman	Principal (BS-18) GGHSS Darband Mansehra	Principal (BS-18) GGHSS Berote Abbottabad	Vice Sr. No. 9
2	Romana Masood D/O Mohammad Masoud	Principal (BS-18) GGHSS Ghari Phulgran Abbottabad	Principal (BS-18) GGHSS Kalabat Swabi	A.V.P
3	Dilnashin Bibi D/O Manzoor Ur Rehman	Vice Principal (BS-18) GGHSS Jungle Khel Kohat	Vice Principal (BS-18) GGHSS Babri Banda Kohat	A.V.P
4	Mst. Sajida Parveen, HM (BS-17)/ Ex-Principal (BS-18) GGHSS Beer Haripur		SS (Urdu) BS-17 GGHSS Beer Haripur	A.V.P
5	Shakila D/O Muhammad Rashid	Principal (BS-18) GGHSS Totano Banda Swat	Principal (BS-18) GGHSS Khadig Zai Dir Lower	A.V.P
6	Shaukat Ara D/O Muhammad Zamin Khan	Principal (BS-18) GGHSS Gwalera Swat	Principal (BS-18) GGHSS Totano Banda Swat	Vice Sr. No. 5
7	Mrs. Noor Afshan, SS (English) BS-17 GGHSS Gulshan Abad Maneri Payan Swabi		SS (English) BS-17 GGHSS Hattar Haripur	A.V.P (Vice Mst. Irum Jabeen who has been selected as Principal/ Vice Principal)
8	Mst. Maryam Fatima, SS (English) BS-17 GGHSS Baja Swabi		SS (English) BS-17 GGHSS Gulshan Abad Maneri Payan Swabi	Vice Sr. No. 7
9	Rafia Naz D/O Ghulam Mujtaba Khan	Principal (BS-18) GGHSS Berote Abbottabad	AV Aid Officer (BS-18) at DCTE Abbottabad	A.V.P
10	Tauheed Bibi D/O Sarfaraz	Principal (BS-18) GGHSS Agra Malakand	Vice Principal (BS-18) GGHSS Sakhakot Malakand	A.V.P
11	Farida Jabeen D/O Said Qamraish	Principal (BS-18) GGHSS Bakhshali Mardan	Principal (BS-18) GGHSS Manga Mardan	A.V.P
12	Rozina Jamil D/O Abdul Malik Safi	Principal (BS-18) GGHSS Jamal Garhi Mardan	Principal (BS-18) GGHSS Madey Baba Mardan	A.V.P

**ATTESTED**

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(11)

13	Mst. Sanjila Rubi, HM (BS-17) working as Principal (BS-18) GGHS Togh Bala Kohat (in OPS)	HM (BS-17) GGHS Hassan Khel Kohat	HM (BS-17) GGHS Kharmato Kohat	A.V.P
14	Mst. Khadija, HM (BS-17) working as Principal (BS-18) GGHS Rajoya Abbottabad (in OPS)	HM (BS-17) GGHS Rabi Abbottabad	HM (BS-17) GGHS Bodla Abbottabad	A.V.P
15	Mst. Zahida, SS (Maths) BS-17 working against BS-18 post at GGHS Havelian Abbottabad	SS (Maths) BS-17 GGHS Trawra Mansehra	SS (Maths) BS-17 GGHS Sirikot Haripur	A.V.P
16	Mst. Sughra Bibi, SS (Physics) BS-17 working against BS-18 post at GGHS Kot Najibullah Haripur		SS (Physics) BS-17 GGHS Noordi Haripur	A.V.P

2. No TA/DA allowed.

SECRETARY

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. In charge EMIS E&SE Department for uploading at official website.
- 6. PS to Secretary E&SE Department.
- 7. Principal/ Vice Principal/ Headmistress & Subject Specialists concerned.
- 8. Office order file.



(GUL RUKH)

SECTION OFFICER (SCHOOLS FEMALE)

ATTESTED



# GOVERNMENT OF KHYBER PAKHTUNKHWA

ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT

Block- "A" Opposite MPA's Hostel, Civil Secretariat Peshawar

Phone: 091-9210480, Fax # 091-9211419

Dated Peshawar the June 8<sup>th</sup>, 2021

## NOTIFICATION

**NO.SO(S/F) E&SED/4-16/2020/TC/BS-18,17:** The Competent Authority is pleased to issue the following posting/transfers orders, in the best public interest, with immediate effect.

S. No	NAME	FROM	TO	REMARKS
1.	Mst. Noor Afhsan SS English (BS-17)	SS English (BS-17) GGHSS, Hattar, Haripur	SS English (BS-17) GGCMHSS No1, Haripur	A.V.P Newly upgraded School
2.	Mst. Shakeela Naz SS Biology (BS-17)	SS Biology (BS-17) GGHSS Kinlinger, Haripur	SS Biology (BS-17) GGHSS Noudeh, Nowshera	A.V.P Newly upgraded School.
3.	Mst. Naheed Mubarak SS Islamiyat (BS-17)	SS Islamiyat (BS-17) GGHSS Beer, Haripur	SS Islamiyat (BS-17) GGCMHS No 1, Haripur	A.V.P Newly upgraded School.
4.	Mst. Nargis Inam Din Headmistress (BS-17)	Headmistress (BS-17) GGHS Kalupid, Haripur	Headmistress (BS-17) GGHS Derwaish, Haripur	A.V.P Newly upgraded School.
5.	Mst. Robina Shah Principal (BS-18)	Principal (BS-18) GGHSS Pir Abad, Mardan	Principal (BS-18) GGHSS Seri Behlol, Mardan	A.V.P Newly upgraded School.

2. No TA/DA is allowed.

**SPECIAL SECRETARY**  
ELEMENTARY & SECONDARY  
EDUCATION 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 Officer (Female), Concern.
4. District Account Officer, Concern.
5. Director EMIS, E&SE Department for uploading at official website at the earliest.
6. PS to Secretary, E&SE Department.
7. Officers concerned.
8. Office order file.

**ATTESTED**

(FAWAD KHATTAK)  
SECTION OFFICER (S/F)

8/6/21

To

The Principal,  
GGCMHS Haripur.

Subject: - ARRIVAL REPORT

Incompliance with the order of Government of Khyber Pakhtunkwa  
E&SED Peshawar vide Notification No. SO(S/F) E&SED/4-16/2020/TC/BS-18, 17 dated,  
Peshawar the 08-06-2021.

I beg to submit my arrival report for duty today on 09-06-2021 (A.N).



Ms. NOOR AFSHAN  
(SS English BPS-17)

GGCMHSS No.1 Haripur

  
**ATTESTED**



- 23 -      (10)      (14)

**REPORT OF TRANSFER OF CHARGE**

1. Certified that we have on the forenoon of this day 10-06-2021 respectively made over and received charge of this office of the post of SS (English) BS-17 at Govt. Girls Higher Secondary School Hattar, Haripur vide Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department Notification No. SO(S/F)E&SED/1-16/2020/TC/ BS-18, 17 dated Peshawar the June 8<sup>th</sup>, 2021.
2. Particulars of cash and important secret and confidential documents handed over and noted on the reverse: -

Signature of Relieved: \_\_\_\_\_

Government Servant \_\_\_\_\_

Designation: \_\_\_\_\_



NOOR AFSHAN

SS (English) BS-17

Station:- GGHSS Hattar, Haripur

Signature of Relieving: \_\_\_\_\_

Government Servant: \_\_\_\_\_

Designation: \_\_\_\_\_

-----xxxxx-----

Vacant Post

SS (English) BS-17

Dated: 10-06-2021 (F.N)


**OFFICE OF THE PRINCIPAL**  
**GOVT. GIRLS HIGHER SECONDARY SCHOOL HATTAR HARIPUR**

Endst. No. 446-491

Dated: 10-06 /2021

Copy of the above is submitted for information to:

1. The District Education Officer (Female) Haripur.
2. The District Accounts Officer, Haripur.
3. Office Record File.



PRINCIPAL  
GGHSS HATTAR, HARIPUR

~~ATTESTED~~

REPORT OF TRANSFER OF CHARGE

1. Certified that we have on the afternoon of this day 10-06-2021 respectively made over and received charge of this office of the post of SS (English) BS-17 at Govt. Girls Centennial Model Higher Secondary School No.1 Haripur vide Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department Notification No. SO(S/F)E&SED/4-16/2020/TC/BS-18, 17 dated Peshawar the June 8<sup>th</sup>, 2021.
2. Particulars of cash and important secret and confidential documents handed over and noted on the reverse: -

Signature of Relieved: -----xxxxx-----

Government Servant: Vacant Post

Designation: SS (English) BS-17

Station:- GCCMHSS No.1, Haripur

Signature of Relieving: Noor Afshan

Government Servant: NOOR AFSHAN

Designation: SS (English) BS-17

Dated: 10-06-2021 (A.N)



OFFICE OF THE PRINCIPAL  
GOVT. GIRLS CENTENNIAL MODEL HIGHER SECONDARY SCHOOL NO.1  
HARIPUR

Endst. No. 1458-59,

Dated: 10/06 /2021

Copy of the above is submitted for information to:

1. The District Education Officer (Female) Haripur.
2. The District Accounts Officer, Haripur.
3. Office Record File.

Noor Afshan  
PRINCIPAL  
GCCMHSS NO.1, HARIPUR  
PRINCIPAL  
GCCMHSS NO.1  
HARIPUR

**ATTESTED**





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# GOVERNMENT OF KHYBER PAKHTUNKHWA

ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT

Block- "A" Opposite MPA's Hostel, Civil Secretariat Peshawar

Phone: 091-9210480, Fax # 091-9211419

Dated Peshawar the June 9<sup>th</sup>, 2021

## NOTIFICATION

NO.SO(S/F) E&SED/4-16/2020/TC/BS-17: The Competent Authority is pleased to issue the following posting/transfers orders, in the best public interest, with immediate effect.

SR.#	NAME	FROM	TO	REMARKS
01	Mst. Fasiha Malik SS English (BS-17)	SS English (BS-17) GGHSS Kangra Colony, Haripur	SS English (BS-17) GGCMHSS No 1 Haripur	A.V. P
02	Mst. Saira Bibi SS English (BS-17)	SS English (BS-17) GGHSS Rich Bhen, Abbottabad.	SS English (BS-17) GGHSS Kangra Colony, Haripur	Vice S. No 1
03	Mst. Asia Bibi SS Biology (BS-17)	SS Biology (BS-17) GGHSS Bandi Munim	SS Biology (BS-17) GGCMHSS No 1 Haripur	A.V. P
04.	Mst. Tayyaba SS Physics (BS-17)	SS Physics (BS-17) GGHSS Dingi, Haripur	SS Physics (BS-17) GGCMHSS No 1 Haripur	A.V. P

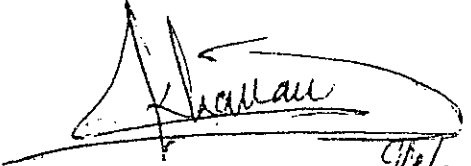
2. No TA/DA is allowed.

**SPECIAL SECRETARY**  
ELEMENTARY & SECONDARY  
EDUCATION 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 Officer (Female), Concerned.
4. District Account Officer, Concerned.
5. Director EMIS, E&SE Department for uploading at official website at the earliest.
6. PS to Secretary, E&SE Department.
7. Officers concerned.
8. Office order file.

  
(FAWAD KHATTAK)  
SECTION OFFICER (S/F) 9/6/21

**ATTESTED**

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# GOVERNMENT OF KHYBER PAKHTUNKHWA

ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT

Block- "A" Opposite MPA's Hostel, Civil Secretariat Peshawar

Phone: 091-9210480, Fax # 091-9211419

Dated Peshawar the June 9<sup>th</sup>, 2021

## NOTIFICATION

NO.SO(S/F) E&SED/4-16/2020/TC/BS-18,17: The Competent Authority is pleased to withdraw this Department's notification of even number dated 08-06-2021 of all the officers i.e. Mst. Noor Afshan SS English (BS-17), Mst. Shakeela Naz SS Biology (BS-17), Mst. Naheed Mubarak SS Islamiyat (BS-17), Mst. Nargis Imam Din Headmistress (BS-17) and Mst. Robina Shah Principal (BS-18) ab initio.

**SPECIAL SECRETARY**  
ELEMENTARY & SECONDARY  
EDUCATION 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 Officer (Female), Haripur, Mardan, Nowshera
4. District Accout Officer, Haripur, Mardan, Nowshera.
5. Director EMIS, E&SE Department for uploading at official website at the earliest.
6. PS to Secretary, E&SE Department.
7. Officers concerned.
8. Office order file.

(FAWAD KHATTAK)  
SECTION OFFICER (S/F)

9/6/21

**ATTESTED**



**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
Block- "A" Opposite MPA's Hostel, Civil Secretariat Peshawar  
Phone: 091-9210480, Fax #: 091-9211419  
Dated Peshawar the June 10<sup>th</sup>, 2021

**NOTIFICATION**

NO.SO(S/F) E&SED/4-16/2020/TC/BS-18,17: The Competent Authority is pleased to withdraw this Department's notification of even number dated 08-06-2021 of all the officers i.e. Mst. Noor Afshan SS English (BS-17), Mst. Shakeela Naz SS Biology (BS-17), Mst. Naheed Mubarak SS Islamiyat (BS-17), Mst. Nargis Inam Din Headmistress (BS-17) and Mst. Robina Shah Principa (BS-18) ab initio.

**SPECIAL SECRETARY**  
ELEMENTARY & SECONDARY  
EDUCATION 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 Officer (Female), Haripur, Mardan, Nowshera
4. District Account Officer, Haripur, Mardan, Nowshera.
5. Director EMIS, E&SE Department for uploading at official website at the earliest.
6. PS to Secretary, E&SE Department.
7. Officers concerned.
8. Office order file.

10/6/21

(FAWAD KHATTAK)  
SECTION OFFICER (S/F)

**ATTESTED**

“J”

(20)

To

The Worthy Chief Secretary,  
Government of Khyber Pakhtunkhwa, Peshawar.

Through: Proper Channel

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

Subject: DEPARTMENTAL APPEAL AGAISNT THE IMPUGNED ORDER DATED 10.06.2021 AND ORDER DATED 09.06.2021 WHEREBY THE TRANSFER ORDER DATED 08.06.2021 HAVE BE ILLEGALLY WITHDRAWN.

Prayers: On acceptance of this departmental appeal, the impugned order dated 10.6.2021 may very graciously be recalled and order dated 08.06.2021 may be restored.

Respected Sir,

1. It is submitted that the appellant was transferred from GGHSS, Hattar, Haripur to GGCMHSS No.1 Haripur vide Notification No. SO(S)F/E&SE/2020/TC/BS-18,17 dated 08.6.2021 as Subject Specialist (English) and the appellant assumed the charge accordingly. Cop of order is attached at Annex-A.
2. That on 09.06.2021, the department illegally issued order and posted Mst. Fasiha Malik to GGCMHSS No.1 Haripur, whereby the appellant was already posted in the said school SS (English) and also assumed the charge accordingly (copy of the order dated 09.06.2021 is at Annex-B).
3. That thereafter, the department issued another illegal Notification dated 10.06.2021, whereby the order/Notification dated 08.06.2021 was withdrawn. Moreover, it is submitted that the impugned order dated 10.06.2021 was against the Education Department posting/transfer policy and issued to illegally facilitate the blue eyed persons. (copy of order dated 10.6.2021 is at Annex-C).

~~ATTACHED~~

(21)

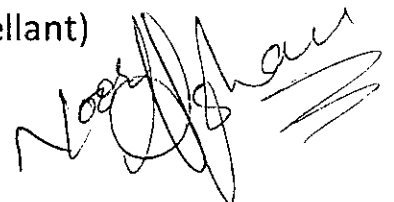
-2-

4. That the impugned orders/notifications dated 09.6.2021 and dated 10.6.2021 are illegal, against law/rules and transfer policies and norms of natural justice and also against the decisions of Apex Courts, hence liable to be set-aside.
5. If your goodself disagree with the aforesaid humble submissions, then the appellant may please be heard in person.

It is therefore, humbly requested that on acceptance of this departmental appeal, the impugned Notifications/Orders dated 9<sup>th</sup>, 10<sup>th</sup> June, 2021 may please be set-aside and the Notification dated 08.06.2021 may graciously be restored in the interest of Law, justice and equity.

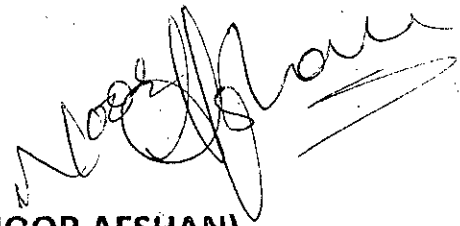
(Appellant)

Dated 11.6.2021

  
(NOOR AFSHAN)  
SS ENGLISH BS-17  
GGHSS NO.1 HARIPUR

Copy forwarded for information and further n/action to:

1. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
2. Minister for E&SE Department, Khyber Pakhtunkhwa.

  
(NOOR AFSHAN)  
SS ENGLISH BS-17  
GGHSS NO.1 HARIPUR

~~ATTESTED~~





(K) (2)  
GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT

No. SO(S/F)E&SED/4-162021/Mst.Noor Afshan.  
Dated Peshawar the June 23<sup>rd</sup>, 2021

Mst Noor Afshan Subject Specialist (English),  
GGHSS Hattar Haripur

**SUBJECT: DEPARTMENTAL APPEAL AGAINST THE IMPUGNED ORDER DATED 10.06.2021 AND ORDER DATED 09.06.2021 WHER BY THE TRANSFER ORDER DATED 08.06.2021 HAVE BE ILLEGALLY WITHDRAWN.**

I am directed to refer to your request dated 11.06.2021 on the subject noted above and to state that the instant request submitted by you for the withdrawn of this department notification dated 29.04.2021 has been regretted by the Competent Authority in this Department.

(FAWAD KHATTAK)  
SECTION OFFICER (S/F) 23/6/21

Copy forwarded to:

1. PS to Secretary, E&SE Department.

SECTION OFFICER (S/F) 23/6/21

**ATTESTED**



# GOVERNMENT OF KHYBER PAKHTUNKHWA

ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT

Opposite MPA's Hostel, Civil Secretariat, Peshawar

Fax # 091-9211419

Dated Peshawar the July 8<sup>th</sup>, 2021

33	Mst. Robina Khan	SS English (BS-17) GGHSS Manki Sharif, Nowshera	SS English (BS-17) GGHSS Badrashi, Nowshera	A.V.P
34	Mst. Humaira Nasim	SS English (BS-17) GGHSS Piti Pai, Nowshera	SS English (BS-17) GGHSS Wadpaga, Peshawar	A.V.P
35	Mst. Rakshanda Irum	SS H/Civics (BS-17) GGHSS Rustom Khel, Mardan	SS H/Civics (BS-17) GGHSS Jamal Ghari, Mardan	A.V.P
36	Mst. Tajanul Fatima	SS Islamiyat (BS-17) GGHSS Ikram Pur, Mardan	SS Islamiyat (BS-17) GGCMHSS Bicket Ganj Canal Road, Mardan	A.V.P
37	Mst. Nahced Mubarak	SS Islamiyat (BS-17) GGHSS Beer, Haripur	SS Islamiyat (BS-17) GGCMHSS Haripur No. 1, Haripur	A.V.P
38	Mst. Ghazala Shabnam	SS Islamiyat (BS-17) GGHSS Kati Ghari, Mardan	SS Islamiyat (BS-17) GGHSS Bakri Band, Mardan	A.V.P
39	Mst. Shumaila	SS Maths (BS-17) GGHSS Gandhian, Mansehra	SS Maths (BS-17) GGCMHS Haripur No.1 Haripur	A.V.P
40	Mst. Rakshanda Yousaf	SS Maths (BS-17) GGHSS Goriwala, Bannu	SS Maths (BS-17) GGHSS Dheri Saidan, Bannu	A.V.P
41	Mst. Qurat ul Ain Younis	SS Maths (BS-17) GGHSS Shergarh, Mansehra	SS Maths (BS-17) GGHSS Nokot, Mansehra	A.V.P
42	Mst. Wajecha Jawved	SS Pak- Study (BS-17) GGHSS Oghi, Mansehra	SS Pak-Study (BS-17) GGHSS Nokot, Mansehra	A.V.P
43	Mst. Gul Naz Bibi	SS Pak- Study (BS-17) GGHSS Beer, Haripur	SS Pak- Study (BS-17) GGHSS Bandi Muneem, Haripur	A.V.P
44	Mst. Sabina	SS Pak- Study (BS-17) GGHSS Gulshan Abad, Swabi	SS Pak- Study (BS-17) GGHSS Jehangira, Swabi	A.V.P

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**ATTESTED**



**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
 ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
 Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar  
 Phone: 091-9210480, Fax # 091-9211419

Dated Peshawar the January 24<sup>th</sup>, 2020

**CORRIGENDUM**

No. SO(S/P)E&SED/1-3/2019/Promotion/BS-17 to BS-18/EC: In partial modification of this department notification of even No. dated 27-11-2019 and in continuation of this department notification of even No. dated 09-12-2019, the following corrigendum is hereby issued:

S#	Name, Designation & Current Station	Domicile	Posted As	Remarks
1	Mst. Bushra Salim, SS (Biology) BS-17 under transfer to GGHSS Kakul Abbottabad		SS (Biology) BS-17 GGHSS Dingi Haripur	Vacated due to promotion of incumbent Zahida Noor
2	Mst. Ambreen Gul, SS (Eng) BS-18 under transfer to GGHSS Timergara Dir Lower	Bannu	SS (Eng) BS-18 GGHSS No. 2 Bannu	AVP
3	Mst. Waheeda Ali, Principal (BS-18) under transfer to GGHSS Bakhshali Mardan	Mardan	Principal (BS-18) GGHSS Tambulak Mardan	AVP Her previous place of posting in promotion order may be read as "GGHS Tambulak Mardan" instead of "GGHS Rustam Khel Mardan"
4	Mst. Bibi Zahida, SS (Eng) BS-17 unadjusted	Mansehra	SS (Eng) BS-17 GGHSS Phulra Mansehra	AVP
5	Mst. Nazia Bibi, SS (Stats) BS-17 under transfer as HM (BS-17) GGHSS Zakhi Khel Nowshera		SS (Stats) BS-17 GGHSS Lady Griffith Peshawar	Vacated due to promotion of Shabana
6	Mst. Mehmooda Shaheen, Principal (BS-18) GGHSS Koto Dir Lower	Peshawar	SS (Maths) BS-18 GGHSS Akora Khattak Nowshera	AVP
7	Mst. Khizran, SS (English) BS-18 under transfer as Principal (BS-18) GGHSS Bunir	Charsadda	Instructor (BS-18) RITE (F) Charsadda	Vice Sr. No. 38
8	Mst. Fatima Gul, Principal (BS-18) under transfer to GGHSS Agra Malakand	Malakand	Principal (BS-18) GGHSS Wartiar Malakand	AVP

**ATTESTED**

126	Mst. Fasiha Malik, SS (Eng) BS-17 GGHSS Hajia Gali Abbottabad	---	SS (Eng) BS-17 GGHSS Khanpur Haripur	AVP
127	Mst. Rizwana Manzoor, SS (IT) BS-17 GGHSS Panian Haripur	---	SS (IT) BS-17 GGHSS Kalinger Haripur	AVP
128	Mst. Maryam Fatima, SS (Eng) BS-17 GGHSS Gulshan Abad Swabi	---	SS (Eng) BS-17 GGHSS Dingi Haripur	AVP
129	Mst. Noor Afshan, SS (Eng) BS-17 GGHS Hattar Haripur	---	SS (Eng) BS-17 GGHSS Kalinger Haripur	AVP
130	Mst. Uzma, SS (Urdu) BS-17 GGHSS Chakdara Dir Lower	---	SS (Urdu) BS-17 GGHSS Dheri Alladand Malakand	AVP
131	Mst. Shehzadi Nadia, SS (Biology) BS-17 GGHSS Hajia Gali Abbottabad	---	SS (Biology) BS-17 GGHSS Dingi Haripur	AVP
132	Mst. Nosheen Bibi, IPE (BS-17) GGHSS Noerdi Haripur	---	IPE (BS-17) GGHSS Kalinger Haripur	AVP
133	Mst. Farzana Bibi, HM (BS-17) GGHS Malik Abad Swabi	---	HM (BS-17) GGHS Behra Haripur	AVP
134	Mst. Shamim Ara, Librarian (BS- 17) GGHSS Balakot Mansehra	---	SS (English) BS-17 GGHSS Tikri Kharari Battagram	AVP
135	Mst. Sadia Riaz, SS (Maths) BS-17 GGHSS Dingi Haripur	---	SS (Maths) BS-17 GGHSS Kalinger Haripur	AVP
136	Mst. Sadia Masroor, SS (Eng) BS- 17 GGCMHSS Garhi Phulgran Abbottabad	---	SS (Eng) BS-17 GGHSS Hattar Haripur	AVP
137	Mst. Riffat Sarwar, HM (BS-17) GGHS Passani Peshawar	---	HM (BS-17) GGHS Palosi Maghdarzai Peshawar	Vice Sr. No. 138
138	Mst. Safia, HM (BS-17) GGHS Palosi Maghdarzai Peshawar	---	At the disposal of Directorate of E&SE	---

2. No TA/DA will be allowed for joining their duties.

3. The above orders will be effective subject to the condition that the officers at Sr. No. 09, 64, 96, 110 & 116; will give an undertaking/ Affidavit on legal/ stamp paper to Secretary E&SE/ Directorate E&SE, Peshawar to the effect that they will not claim benefits of graded pay and seniority of the higher pay scale.

SECRETARY  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Endst: of even No. & date:

Copy forwarded to the:

- Accountant General Khyber Pakhtunkhwa, Peshawar.
- Director E&SE Khyber Pakhtunkhwa, Peshawar
- District Education Officers (Female) concerned.
- District Accounts Officers concerned.

**ATTESTED**

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- PS to Minister for E&SE Khyber Pakhtunkhwa Peshawar.
- PS to Secretary E&SE Department.
- In-charge EMISE, E&SE Department for uploading at official website at the earliest.
- Officers concerned.
- Office order file.

*AK* *K* *er* 24/1/2020

(AKASHA KIRAN)  
SECTION OFFICER (SCHOOLS FEMALE)

~~ATTESTED~~



**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
**ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT**

Dated Peshawar the September 18<sup>th</sup>, 2020

**NOTIFICATION**

**No. SO(S/EE&SED)/4-16/2020/Posting/Transfer/TC**      Consequent upon the approval of the Competent Authority, the posting/transfer of following female teachers is hereby ordered, on the posts/stations, as mentioned against each, in the best public interest, with immediate effect:

Sr. #	Name/ Designation	From	To	Remarks
1.	Mst. Gulzaman, SS Statistics (BS-18)	CGCMS Kotajibullah, Haripur	SS Statistics (BS-18) GGHSS Ghoriwala, Hanna	Vice St. No. 2
2.	Mst. Aneela Ashraf SS Statistics (BS-17)	GGHSS Choriwala, Hanna in OPS	SS Statistics (BS-17) GGHSS Bangash, Khel, Ramn	against vacant post
3.	Syeda Adila Zafar, IPE (BS-17)	GGHSS Dingi, Haripur	IPE (BS-17) GGHSS Kangra Colony, Haripur	against vacant post
4.	Mst. Anisa Qazi, SS Physics (BS-17)	GGHSS Shahqadar, Charasadda	SS Physics (BS-17) GGHSS Lamanzai, Charasadda	against vacant post
5.	Mst. Reshan Ara Headmistress (BS-17)	GGHS Wanda Lali, D.I.Khan	SS Home Economics (BS-17) GGHSS Panzaha, D.I.Khan	As stop gap arrangement
6.	Mst. Manaza Hamman, SS English (BS-18)	Working as SS Physics (BS-18) GGHSS Gotal Habibullah, Mansehra	Principal (BS-18) GGHS Traura, Oghi, Mansehra	As stop gap arrangement after retirement of the incumbent Principal on 18.09.2020
7.	Mst. Zahida Parveen SS Maths (BS-17)	GGHSS Sikiot, Haripur	SS Maths (BS-17) GGHSS Noordi, Haripur	against vacant post
8.	Mst. Fasiha Malik SS English (BS-17)	GGHSS Khanpur, Haripur	SS English (BS-17) GGHSS Kangra, Haripur	against vacant post
9.	Mst. Zahida Bibi SS Islamiyat (BS-17)	Working as HM GGHS Khai Bahara, D.I.Khan	SS Islamiyat (BS-17) GGHSS Pahrpur, D.I.Khan	against vacant post
10.	Mst. Sobha Afsar SS English (BS-17)	GGHSS Lora, Abbottabad	SS English (BS-17) GGHSS Behali, Mansehra	against vacant post
11.	Mst. Sabia Bano, Principal (BS-18)	Working as Principal (BS-19) GGHSS Balakot, Mansehra	V. Principal (BS-18) GGHSS Balakot, Mansehra	Against her original vacant post
12.	Mst. Nagina Shulteen, IPE (BS-17)	GGHS Zarabi, Swabi	IPE (BS-17) GGHSS Dingi, Haripur	Vice St. No. 3
13.	Mst. Sonia Noreen, SS English (BS-17)	GGHSS Esak, Chaurra	SS English (BS-17) GGHSS Bilitang, Kohat	Against vacant post

**ATTESTED**

o.s/a/ps/20  
 Alam

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15	Mrs. M. Sultana, SS English (BS-17)	GGHSS Chapra, Haripur	SS English (BS-17) GGHSS Khanjor, Haripur	Vice Sr. No. 11
16	Mrs. M. Jabeen, SS English (BS-17)	Working as SS Statistics (BS-17) GGHSS Chapra, Haripur	SS English (BS-17) GGHSS Haripur	Vice Sr. No. 14 Against original vacant post
16	Mrs. Narsat Jabeen, SS English (BS-17)	Instructor (RITE) Male; Drosh, Chitral	SS Chemistry (BS-17) GGHSS Shiqatek, Lower Chitral	Against vacant post as stop gap arrangement
17	Mrs. Nazli Isayat, Headmistress (BS-17)	GGHSS Chalagail, Molmand	Headmistress (BS-17) GGHS Mohammad Zai, Peshawar	Against vacant post
18	Mrs. Rizwana Ishaq, Headmistress (BS-17)	GGHS Alooli, Haripur	SS Chemistry GGHSS Kangra Colony, Haripur	As stop gap arrangement
19	Mrs. Kousar Sultana, Headmistress (BS-17)	GGHS Kallag, Haripur	Headmistress (BS-17) Alooli, Haripur	Vice Sr. No. 18
20	Mrs. Shikela Naz, SS Biology (BS-17)	GGHS Dingi, Haripur	SS Biology GGHSS Kalingar, Haripur	Against vacant post
21	Mrs. Rashida Gul, SS Maths (BS-17)	GGHSS KTS No 2, Haripur	SS Maths (BS-17) GGHS Kalingar, Haripur	Against vacant post

2. No TADA is allowed.

SECRETARY  
ELEMENTARY & SECONDARY  
EDUCATION DEPARTMENT

Ends of even No. & date:

- Copy forwarded to the:
- Accountant General, Khyber Pakhtunkhwa, Peshawar.
- Director E&SE, Khyber Pakhtunkhwa, Peshawar.
- District Education Officers (Female) concerned.
- District Accounts Officers concerned.
- PS to Minister for E&SE, Khyber Pakhtunkhwa.
- PS to Secretary E&SE Department.
- Director E.M.S. E&SE Department for uploading in official website.
- Office order file.

*(Signature)*  
 04/9/2010  
 (ABDUS SALAM)  
 SECTION OFFICER (SO)

**ATTESTED**





# GOVERNMENT OF KHYBER PAKHTUNKHWA

ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
Block- "A" Opposite MPA's Hostel, Civil Secretariat Peshawar

Phone: 091-9210480, Fax # 091-9211419

Dated Peshawar the June 8<sup>th</sup>, 2021

## NOTIFICATION

NO.SO(S/F) E&SED/4-16/2020/TC/BS-18,17: The Competent Authority is pleased to issue the following posting/transfers orders, in the best public interest, with immediate effect.

S. No	NAME	FROM	TO	REMARKS
1	Mst. Noor Afhsan SS English (BS-17)	SS English (BS-17) GGHSS, Hattar, Haripur	SS English (BS-17) GGCMHSS No1, Haripur	A.V.P Newly upgraded School
2	Mst. Shakeela Naz SS Biology (BS-17)	SS Biology (BS-17) GGHSS Kinlinger, Haripur	SS Biology (BS-17) GGHSS Noudeh, Nowshera	A.V.P Newly upgraded School.
3	Mst. Naheed Mubarak SS Islamiyat (BS-17)	SS Islamiyat (BS-17) GGHSS Beer, Haripur	SS Islamiyat (BS-17) GGCMHS No 1, Haripur	A.V.P Newly upgraded School.
4	Mst. Nargis Inam Din Headmistress (BS-17)	Headmistress (BS-17) GGHS Kalupid, Haripur	Headmistress (BS-17) GGHS Derwaish, Haripur	A.V.P Newly upgraded School.
5	Mst. Robina Shah Principal (BS-18)	Principal (BS-18) GGHSS Pir Abad, Mardan	Principal (BS-18) GGHSS Seri Behlol, Mardan	A.V.P Newly upgraded School.

2. No TA/DA is allowed.

**SPECIAL SECRETARY**  
ELEMENTARY & SECONDARY  
EDUCATION/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 Officer (Female), Concern.
4. District Accout Officer, Concern.
5. Director EMIS, E&SE Department for uploading at official website at the earliest.
6. PS to Secretary, E&SE Department.
7. Officers concerned.
8. Office order file.

  
(FAWAD KHATTAK)  
SECTION OFFICER (S/F)

**ATTESTED**

قیمت  
50 روپے

87721



ایڈوکیٹ: \_\_\_\_\_  
بار کونسل / ایسوسی ایشن نمبر: \_\_\_\_\_  
رابطہ نمبر: 0333 02 65900

پشاور بار ایسوسی ایشن، خیبر پختونخواہ

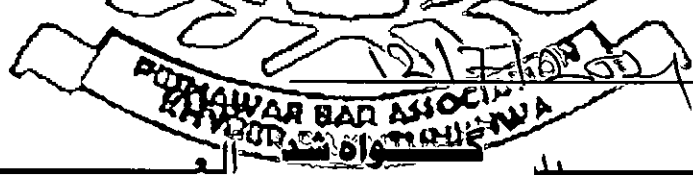
بعدالت جناب: \_\_\_\_\_

 <p>مجاہد اسلامیت</p>	دعویٰ:
	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:

**باعث تحریر آنکہ**

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ

آن مقام \_\_\_\_\_ کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرانے اور تقریر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل اگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہر اہل اختیار سے نجات دے لیا جائے اور صاحب مقرر شدہ کو وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور ان کا استعمال پر داخستہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جائزہ اتوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سندر ہے



المقوم:

مقام \_\_\_\_\_ کے لیے منظور ہے۔

المقوم افشاں

نوٹ: اس وکالت نامہ کی فونو کاپی ناقابل قبول ہوگی۔

Accepted By \_\_\_\_\_

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR**

**Service Appeal No. 7042/2020**

**Mst, Noor Afsha SS (BS-17) GCMHSS No. 1 Haripur.....Appellant**

**VERSUS**

**Govt: of Khyber Pakhtunkhwa through Chief Secretary KP & others.....Respondents.**

**JOINT PARAWISE COMMENTS FOR & ON BEHALF OF THE RESPONDENTS NO. 1 & 2.**

**Respectfully Sheweth,**

**Preliminary Objections**

- i. That the appellant has got no cause of action to file the instant appeal.
- ii. That the Appellant is not aggrieved person within the meaning of Article 199 of the Constitution of Islamic Republic of Pakistan 1973.
- iii. That Appellant is estopped by his own conduct to approach this Hon'able Tribunal.
- iv. That no vested right of the appellant has been infringed nor any provisions of the Constitution have been violated, therefore, the instant Service Appeal is not maintainable in the circumstances.
- v. That the instant appeal is based on mala-fide intention just to put pressure on the Respondents for the grant of illegal and even unauthorized service benefits.
- vi. The present appeal has been filed to entangle the Department unnecessarily in litigation and to waste the precious time of the respondents as well as of this Hon'able Tribunal.
- vii. That the present appeal is against the relevant provision of law and rules.
- viii. That in the instant Service Appeal the Appellant has suppressed material facts from this Honorable Tribunal which are sin-qua-non for the just and fair disposal of the case.
- ix. That the appellant has been working against the provincial cadre post as per Civil Servant Act, 1973 Section-1-, that every civil servant shall be liable to serve anywhere within or outside the district.

**FACTS.**

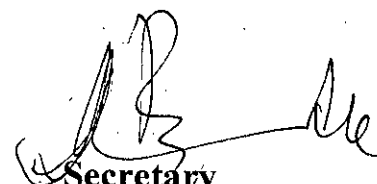
1. Pertains to service record of the appellant.
2. Pertains to record of the appellant, however the appellant has not annexed any record / evidence related to her performance.
3. Pertains to record of the appellant, but the appellant was transferred after lapse of one year only and the appellant did not oppose the said order / notification.
4. Correct to the extent of notification dated 08.06.2021, but in the said notification an alternate teacher / substitute was not provided to the school from where the appellant was transferred, due to which student at her previous station / school was badly suffered. Hence the said notification was withdrawn including other teachers along with the appellant (**Annex-A**).

5. As already explained in forgoing Para that the said notification was withdrawn from the issue date, hence relinquish of charge and arrival report of the appellant were not necessary.
6. That the notification was issued on 08.06.2021 while withdrawn on 09.06.2021 as admitted by the appellant, hence regular attendance of the appellant is astonishing.
7. That order dated 08.06.2021 has been withdrawn on 09.06.2021 due to exigency of the school and study of the student will have suffered at the school earlier posted namely hatter Dist Haripur.
8. In correct and denied, the statement of the appellant against the facts and circumstance the appellant has not provided any proof of political approach / political influence.
9. Correct to the extent that appeal of appellant has no legal ground that is why her appeal was reject by the department.
10. Incorrect due to exigency, another teacher was posted so that precious time of students should not waste.
11. Incorrect, as already explained in para 8.
12. That the notification was issued on 08.06.2021 while withdrawn on 09.06.2021 as admitted by the appellant, hence regular attendance of the appellant is astonishing, hence the instant service appeal may be dismissed inter alia in the following grounds: -

#### GROUNDS

- A. **Incorrect and not admitted**, The appellant has been treated in accordance with Law and rules on the subject and no right of the appellant has been violated.
- B. **Incorrect and not admitted**. The stance of the appellant is false against the facts and materials on record and against the law rules on subject hence denied.
- C. **In correct**. Hence explained above.
- D. **Incorrect**. according to law and rules the appellant has been treated.
- E. That respondents also seek permission of this Honorable Tribunal to add more ground and proofs at the hearing of this appeal.

**In view of the above made submissions, it is, therefore, most humbly prayed that this Honorable Court may very graciously be pleased to dismiss the instant service appeal with cost in favor of the Respondents in the interest of justice.**

  
**Secretary**  
E&SE Department.



# GOVERNMENT OF KHYBER PAKHTUNKHWA

ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT

Block- "A" Opposite MPA's Hostel, Civil Secretariat Peshawar

Phone: 091-9210480, Fax # 091-9211419

Dated Peshawar the June 9<sup>th</sup>, 2021

## NOTIFICATION

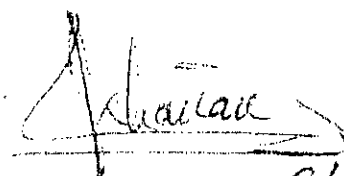
**NO.SO(S/F) E&SED/4-16/2020/TC/BS-18,17:** The Competent Authority is pleased to withdraw this Department's notification of even number dated 08-06-2021 of all the officers i.e. Mst. Noor Afshan SS English (BS-17), Mst. Shakeela Naz SS Biology (BS-17), Mst. Naheed Mubarak SS Islamiyat (BS-17), Mst. Nargis Imam Din Headmistress (BS-17) and Mst. Robina Shah Principal (BS-18) ab initio.

**SPECIAL SECRETARY**  
ELEMENTARY & SECONDARY  
EDUCATION DEPARTMENT

### Endst: of even No.& date:

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE, Khyber Pakhtunkhwa, Peshawar.
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5. Director EMIS, E&SE Department for uploading at official website at the earliest.
6. PS to Secretary, E&SE Department.
7. Officers concerned.
8. Office order file.

  
(FAWAD KHATTAK)  
SECTION OFFICER (S/F) 9/6/21



**KHYBER PAKHTUNKHWA**  
**SERVICE TRIBUNAL, PESHAWAR**

No. 722 /ST

Dated: 21-3- /2022

All communications should be addressed to the Registrar KPK Service Tribunal and not any official by name.

Ph:- 091-9212281  
Fax:- 091-9213262

To

The Secretary E&SE Department,  
Government of Khyber Pakhtunkhwa,  
Peshawar.

Subject: JUDGMENT IN APPEAL NO. 7042/2021 MST. NOOR AFSHAN.

I am directed to forward herewith a certified copy of Judgement dated 31.01.2022 passed by this Tribunal on the above subject for strict compliance.

Encl: As above

  
REGISTRAR

KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL  
PESHAWAR