

13th June, 2022

Clerk of counsel for the appellant present. Mr. Kabeer Ulalh Khattak, AAG for respondent present.

Respondents have not submitted reply/comments. Last opportunity is granted to the respondents to submit reply/comments. To come up for written reply/comments on 21.06.2022 before S.B. *Secretary, Government of Punjab, Lahore*

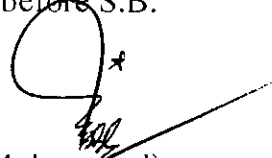


(Kalim Arshad Khan)
Chairman

21.06.2022

Learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Reply/comments on behalf of respondents are still awaited. Learned Additional Advocate General requested for time to submit reply/comments. Last opportunity is extended till the next date, In case, the respondents failed to submit reply/comments on the next date. their right for submission of reply/comments shall be deemed as struck off. Adjourned. To come up for reply/comments on 25.07.2022 before S.B.



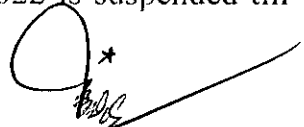
(Mian Muhammad)
Member (E)

24.05.2022

Learned counsel for the appellant present. Preliminary arguments heard.

Learned counsel for the appellant while arguing the case at preliminary hearing stage, contended that the appellant belongs to Management Cadre and she is aggrieved of the impugned Notification dated 11.05.2022 whereby she was transferred and directed to report to Directorate of Elementary and Secondary Education Peshawar. Feeling aggrieved with the said Notification, she preferred departmental appeal to respondent No.1 which was regretted on 19.05.2022 whereafter the instant service appeal was filed in the Service Tribunal on 23.05.2022. It was further argued that the appellant has been victimized through frequent transfer orders within a short span of one year vide earlier order dated 07.10.2021 when she was transferred as SDEO (Female) Mardan to SDEO (Female) Adezai Dir Lower followed by another Notification dated 30.11.2011, when she was transferred as SDEO(Female) Nowshera. The appellant could hardly served for 5 months as SDEO (Female) Nowshera when again transfer^{red And} directed to report to Directorate of Elementary & Secondary Education Peshawar vide impugned order dated 11.05.2022. It was further argued that the impugned order has been issued in total disregard to the Posting Transfer Policy particularly Clause I and IV thereof. Moreover, husband of the appellant is an employee of Pakistan Military Accounts (Nowshera) and the impugned order is even issued in violation of Wed-lock Policy of the Provincial Government dated 07.10.2012. The school going children of the appellant are being badly affected due to the impugned order of appellant, he concluded.

Points raised need consideration. The appeal is admitted to regular hearing, subject to all just and legal objections. 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. To come up for reply/comments before the S.B on 13.06.2022. Alongwith the appeal there is an application for suspending the operation of impugned notification dated 11.05.2022 till the decision of main service appeal. Operation of the impugned notification dated 11.05.2022 is suspended till the next date.


(Mian Muhammad)
Member(E)

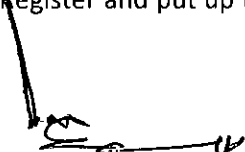

Rs-500/-
Appellate Deposited
Security & Process Fee
A. J. 25/5/22

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 819/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	23/05/2022	<p>The appeal of Mst. Malak Taja presented today by Mr. Taimur Ali 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-	23/5/22	<p>This case is entrusted to Single Bench at Peshawar for preliminary hearing to be put there on <u>24-05-22</u>. Notices be issued to appellants and his counsel for the date fixed.</p> <p style="text-align: right;"> CHAIRMAN</p>

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

Case Title: Mudrik Teja vs Chief Secretary Sothars

S.#	Contents	Yes	No
1.	This appeal has been presented by: _____	/	
2.	Whether Counsel / Appellant / Respondent / Deponent have signed the requisite documents?	/	
3.	Whether Appeal is within time?	/	
4.	Whether the enactment under which the appeal is filed mentioned?	/	
5.	Whether the enactment under which the appeal is filed is correct?	/	
6.	Whether affidavit is appended?	/	
7.	Whether affidavit is duly attested by competent oath commissioner?	/	
8.	Whether appeal/annexures are properly paged?	/	
9.	Whether certificate regarding filing any earlier appeal on the subject, furnished?	/	
10.	Whether annexures are legible?	/	
11.	Whether annexures are attested?	/	
12.	Whether copies of annexures are readable/clear?	/	
13.	Whether copy of appeal is delivered to A.G/D.A.G?	/	
14.	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	/	
15.	Whether numbers of referred cases given are correct?	/	
16.	Whether appeal contains cuttings/overwriting?	/	
17.	Whether list of books has been provided at the end of the appeal?	/	
18.	Whether case relate to this Court?	/	
19.	Whether requisite number of spare copies attached?	/	
20.	Whether complete spare copy is filed in separate file cover?	/	
21.	Whether addresses of parties given are complete?	/	
22.	Whether index filed?	/	
23.	Whether index is correct?		/
24.	Whether Security and Process Fee deposited? on _____		/
25.	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? on _____		/
26.	Whether copies of comments/reply/rejoinder submitted? on _____		/
27.	Whether copies of comments/reply/rejoinder provided to opposite party? on _____		/

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name: Taimur Khan
 Signature: [Signature]
 Dated: _____

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

SERVICE APPEAL NO. 819 /2022

Malak Taje

V/S

Chief Secretary & Others

INDEX

S. No.	Documents	Annexure	P. No.
01	Memo of appeal	-----	01-04
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03	suspension application	-----	06-07
04	Copy of notification dated 07.10.2021	A	08-10
05	Copy of notification dated 30.11.2021	B	11
06	Copies of notification dated 11.05.2022 and service certificate	C&D	12-13
07	Copies departmental appeal and rejection order dated 19.05.2022	E&F	14-17
08	Copies of posting transfer policy and circular dated 27.02.2013	G&H	18-26
09	Copy of circular dated 07.08.2012	I	27-28
10	Vakalat Nama	-----	29

APPELLANT

THROUGH:


(TAIMUR ALI KHAN)
ADVOCATE HIGH COURT

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

SERVICE APPEAL NO. _____/2022

Mst. Malak Taja, (MC- BPS-17)
SDEO (Female), Nowshera.

(APPELLANT)

VERSUS

1. The chief Secretary, Khyber Pakhtunkhwa, Peshawar.
2. The Secretary, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. The Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.

(RESPONDENTS)

APPEAL UNDER SECTION 4 OF THE SERVICE TRIBUNAL ACT, 1974 AGAINST THE ORDER DATED 11.05.2022, WHEREBY THE APPELLANT WAS PREMATURELY TRANSFERRED FROM THE POST OF SDEO (FEMALE) NOWSHERA AND DIRECTED TO REPORT TO THE DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA PESHAWAR AND THE AGAINST THE ORDER DATED 19.05.2022, WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT WAS REJECTED FOR NO GOOD GROUNDS.

PRAYER:

THAT ON THE ACCEPTANCE OF THIS APPEAL, THE IMPUGNED TRANSFER NOTIFICATION DATED 11.05.2022 AND REJECTION ORDER DATED 19.11.2022 MAY KINDLY BE SET ASIDE AND THE RESPONDENT DEPTT: MAY FURTHER PLEASE BE DIRECTED NOT TO TRANSFER THE

APPELLANT PREMATURELY AND IN VIOLATION OF POSTING/TRANSFER POLICY, CIRCULAR DATED 27.12.2013 AND CIRCULAR DATED 07.08.2012. ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.

RESPECTFULLY SHEWETH:

FACTS:

1. That the appellant was appointment as ASDEO (BPS-16) in the year 2011 and promoted from ASDEO (BPS-16) to SDEO (BPS-17) in the year 2019 and since her appointment the appellant is performing her duty with the entire satisfaction of her superiors and no complaint has been filed against her during her performance.
2. That the appellant while serving in the said capacity was transferred from the post of SDEO (Female) Mardan and posted as SDEO (Female) Adezai Dir Lower vide notification dated 07.10.2021. **(Copy of notification dated 07.10.2021 is attached as Annexure-A)**
3. That the appellant was then transferred from the post of SDEO (Female) Mardan and posted as SDEO (Female) Nowshera vide notification dated 30.11.2021. **(Copy of notification dated 30.11.2021 is attached as Annexure-B)**
4. That without completing her normal tenure as SDEO (Female) Nowshera, the appellant was again transferred from the post of SDEO (Female) Nowshera and directed to report to Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar just after 5 months vide notification dated 11.05.2022 . it is pertinent to mention here that the husband of the appellant is also Government Servant working in Military Accounts Department and presently serving in FPO AC (R) Nowshera, which is evident from the service certificate of the husband of the appellant.**(Copies of notification dated 11.05.2022 and service certificate are attached as Annexure-C&D)**
5. That the appellant being aggrieved from the notification dated 11.05.2022 filed departmental appeal on 16.05.2022, which was rejected on 19.05.2022 for no ground. **(Copies of departmental appeal and rejection order dated 19.05.2022 are attached as Annexure-E&F)**
6. That the appellant has no other remedy except to file the instant appeal in this Honourable Tribunal for redressal of her grievance on the following grounds amongst the others.

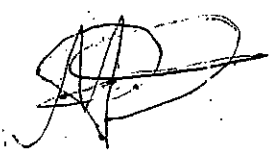
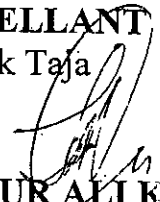
GROUND:

- A) That the impugned transfer notifications dated 11.05.2022 and rejection order dated 19.05.2022 are against the law, facts, norms of justice, premature and violation of posting transfer policy, circular dated 27.02.2013 and circular dated 07.08.2012, therefore, the impugned transfer notification dated 11.05.2022 is not tenable and liable to be set aside.
- B) That the impugned notifications dated 11.05.2022 was passed in violation of posting transfer/policy and circular based on Anita Turab case dated 27.02.2013, therefore, the impugned notifications are liable to be set aside on this ground alone. **(Copies of posting transfer policy and circular dated 27.02.2013 are attached as Annexure-G&H)**
- C) That the husband of the appellant is also Government Servant working in Military Accounts Department and presently serving in FPO AC (R) Nowshera and due to socio-economic problems and hardship faced by husbands and wives in government service due to posting at different stations of duty, the government issued a circular dated 07.08.2012 to facilitate posting of husbands and wives at same station and through impugned transfer notification dated 11.05.2022, the family of the appellant will be badly effected and as such the impugned transfer notification dated 11.05.2022 is liable to be set aside. **(Copy of circular dated 07.08.2012 is attached as Annexure-I)**
- D) The impugned transfer orders is premature as the appellant has not completed her tenure as SDEO (F) Nowshera, therefore, the impugned transfer order is liable to be set aside.
- E) That the post of the appellant is still vacant as no substitute was provided on the post of the appellant by the department and it will not effect any one if the impugned transfer notification dated 11.05.2022 is set aside.
- F) That the appellant has transferred thrice in short spin of time due to which she is unable to perform her duty efficiently and such acts is discouraged by the superior courts in plethora of judgments.
- G) That in passing of impugned transfer notification dated 11.05.2022, no exigencies or public interest was shown by the respondent department, but just wants to adjust blue eyed person on the post of appellant.

- H) That the appellant have school giving children and due to the impugned transfer notification dated 11.05.2022, children of the appellant will be also suffering badly.
- I) That according to posting/transfer policy, that posting/transfer orders of all the officers up to BS-19 except the heads of the attached departments irrespective of the grade will be notified by the concerned Administrative Departments with the prior approval of the competent authority obtained on the summary, but in the case of the appellant, no prior approval of summary for transfer was obtained, which is violation of posting/transfer policy.
- J) That the appellant seeks permission of this Honourable Tribunal to advance others grounds and proofs at the time of hearing.

It is, therefore most humbly prayed that the appeal of the appellant may kindly be accepted as prayed for.

THROUGH:


APPELLANT
Malak Taja

(TAIMUR ALI KHAN)
ADVOCATE HIGH COURT

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

SERVICE APPEAL NO. _____/2022

Malak Taja

V/S

Chief Secretary & Others

.....

AFFIDAVIT

I, Malak Taja, (MC- BPS-17) SDEO (Female), Nowshera (Appellant) do hereby affirm and declare that the contents of this service appeal are true and correct and nothing has been concealed from this august Court.



DEPONENT



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

SERVICE APPEAL NO. _____/2022

Malak Taja

V/S

Chief Secretary & Others

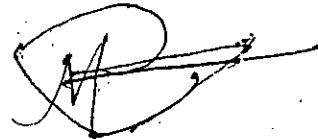
APPLICATION FOR SUSPENDING THE
OPERATION OF IMPUGNED
NOTIFICATIONS DATED 11.05.2022 TILL
THE DECISION OF MAIN SERVICE
APPEAL.

RESPECTFULLY SHEWETH:

- 1) That the appellant has filed an appeal against the impugned notifications dated 11.05.2022, whereby the appellant was premature transferred along with this application in this Honourable service Tribunal in which no date is fixed so for.
- 2) That impugned transfer notifications dated 11.05.2022 is premature and was passed in violation of posting transfer policy, circular dated 27.02.2013 and circular dated 07.08.2012, therefore liable to be suspended.
- 3) That the husband of the appellant is also Government Servant working in Military Accounts Department and presently serving in FPO AC (R) Nowshera, and due to scio-economic problems and hardship faced by husbands and wives in government service due to posting at different stations of duty, the government issued circular dated dated 07.08.2012 to facilitate posting of husbands and wives at same station and the appellant has also school going children and through impugned transfer notification dated 11.05.2022, the family of the appellant will be badly effected and as such the impugned transfer notification dated 11.05.2022 is liable to be suspended.

- 4) That the post of the appellant is still vacant as no substitute was provided on the post of the appellant by the department and it will not effect any one if the impugned transfer is suspended.
- 5) That the appellant has a good prima facie case and all the three ingredients are in favour of the appellant.
- 6) That the grounds of main appeal may also be considered as integral part of this application.

It is therefore most humbly prayed that the operation of the impugned notifications dated 11.05.2022 may kindly be suspended till the decision of main appeal.



APPELLANT
Malak Taja

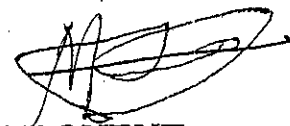
THROUGH:



(TAIMUR ALI KHAN)
ADVOCATE HIGH COURT

AFFIDAVIT

it is solemnly affirmed that the contents of the application is true and correct to best of my knowledge and belief and nothing has been concealed from this Honourable Service Tribunal.



DEPONENT





S.No 20

A 18

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-921488

Dated Peshawar (to, October 07th, 2021

NOTIFICATION

No.SO(S/E) E&SED/A-16/2021/POSTING/TRANSFERS/MC: The Competent authority, in compliance with the decision of the Provincial Cabinet, is pleased to order the posting / transfers of the following Sub Divisional Education Officers (SDEOs BS-17) of the Elementary & Education Department, Khyber Pakhtunkhwa, in the public interest, with immediate effect: -

Sr. No	Name & designation	From	To
1.	Mst. Shahida Parveen SDEO (Female BS-17)	Sub Divisional Education Officer (Female) Peshawar Town-IV vice No-15	Sub Divisional Education Officer (Female) Tangi Charsadda
2.	Mst. Zeenat Begum SDEO (Female BS-17)	Sub Divisional Education Officer (Female) Tangi Charsadda	Sub Divisional Education Officer (Female) Town-I Peshawar.
3.	Mst. Maryam Rashid SDEO (Female BS-17)	Sub Divisional Education Officer (Female) Town-I Peshawar.	Sub Divisional Education Officer (Female) Jehangira Nowshera.
4.	Mst. Syeda Nasra Azam SDEO (Female BS-17)	Sub Divisional Education Officer (Female) Jehangira Nowshera.	Sub Divisional Education Officer (Female) Lower Tanawal Abbottabad.
5.	Mst. Naila Naz SDEO (Female BS-17)	Sub Divisional Education Officer (Female) Swabi.	Sub Divisional Education Officer (Female) Chitral Lower.
6.	Mst. Munsarat Jamal SDEO (Female BS-17)	Sub Divisional Education Officer (Female) Chitral Lower.	Sub Divisional Education Officer (Female) Torkhow Mulkhow Chitral Upper
7.	Mst. Arifa Bibi SDEO (Female BS-17)	Sub Divisional Education Officer (Female) Torkhow Mulkhow Chitral Upper	Sub Divisional Education Officer (Female) Seo Kohistan Upper AVP.
8.	Mst. Nancy Begum SDEO (Female BS-17)	Sub Divisional Education Officer (Female) Topi Swabi	Sub Divisional Education Officer (Female) Haripur
9.	Mst. Surriya Taj SDEO (Female BS-17)	Sub Divisional Education Officer (Female) Haripur	Sub Divisional Education Officer (Female) Pabbi Nowshera
10.	Mst. Nazia Anjum SDEO (Female BS-17)	Sub Divisional Education Officer (Female) Pabbi Nowshera	Sub Divisional Education Officer (Female) Balakot Mansehra.
11.	Mst. Adeela Rani SDEO (Female BS-17)	Sub Divisional Education Officer (Female) Balakot Mansehra.	Sub Divisional Education Officer (Female) Ghazi Haripur.
12.	Mst. Saeeda Bano SDEO (Female BS-17)	Sub Divisional Education Officer (Female) Ghazi Haripur.	Sub Divisional Education Officer (Female) Darband Mansehra.
13.	Mst. Sajida Sakhi SDEO (Female BS-17)	Sub Divisional Education Officer (Female) Darband Mansehra.	Sub Divisional Education Officer (Female) Paltan Kohistan Lower AVP.
14.	Mst. Fozia Parveen SDEO (Female BS-17)	Sub Divisional Education Officer (Female) Serai Naurang Lakki Marwat.	Sub Divisional Education Officer (Female) Takht Nusrati Karak



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9223588

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15.	Mst. Shahnaz Begum SDEO (Female BS-17)	Sub Divisional Education Officer (Female) Takhti Nusrati Karak	Sub Divisional Education Officer (Female) Serai Naurang Lakki Marwat.
16.	Mst. Bibi Arifa SDEO (Female BS-17)	Sub Divisional Education Officer (Female) Mansehra	Sub Divisional Education Officer (Female) Serai Naurang Lakki Marwat.
17.	Mst. Mehar Sani SDEO (Female BS-17)	Sub Divisional Education Officer (Female) Gaggra Buner.	Sub Divisional Education Officer (Female) Havellian Abbottabad.
18.	Mst. Farhat Yasmeen SDEO (Female BS-17)	Sub Divisional Education Officer (Female) Karak	Sub Divisional Education Officer (Female) Takhti Nusrati Karak.
19.	Mst. Bibi Ayesha Naz SDEO (Female BS-17)	Sub Divisional Education Officer (Female) Lower Tanawal Abbottabad.	Sub Divisional Education Officer (Female) Karak
20.	Mst. Malak Taja SDEO (Female BS-17)	Sub Divisional Education Officer (Female) Mardan.	Sub Divisional Education Officer (Female) Adezai Dir Lower.
21.	Mst. Shabnam Bibi SDEO (Female BS-17)	Sub Divisional Education Officer (Female) Adezai Dir Lower.	Sub Divisional Education Officer (Female) Timergara Dir Lower.
22.	Mst. Shaheen Bibi SDEO (Female BS-17)	Sub Divisional Education Officer (Female) Battagram	Sub Divisional Education Officer (Female) Kalkot Dir Upper AVP.
23.	Mst. Shamshad Bibi SDEO (Female BS-17)	Sub Divisional Education Officer (Female) Tank	Sub Divisional Education Officer (Female) Pharpur DI Khan
24.	Mst. Sonia Nawaz SDEO (Female BS-17)	Sub Divisional Education Officer (Female) Pharpur DI Khan	Sub Divisional Education Officer (Female) Tank
25.	Mst. Naheed Fazal SDEO (Female BS-17)	Sub Divisional Education Officer (Female) Abbottabad.	Sub Divisional Education Officer (Female) Sheringle Dir Upper AVP.
26.	Mst. Anisa Jamshed SDEO (Female BS-17)	Sub Divisional Education Officer (Female) Lora Abbottabad.	Sub Divisional Education Officer (Female) Kumbar Dir Lower.
27.	Mst. Nageena Bibi SDEO (Female BS-17)	Sub Divisional Education Officer (Female) Havellian Abbottabad.	Sub Divisional Education Officer (Female) Kundai Kohistan Upper AVP.
28.	Mst. Zahida Khanum SDEO (Female BS-17)	Sub Divisional Education Officer (Female) Lakki Marwat.	Sub Divisional Education Officer (Female) Alai, Battagram AVP.
29.	Mst. Nazma Shaheen SDEO (Female BS-17)	Sub Divisional Education Officer (Female) Khanpur Haripur	Sub Divisional Education Officer (Female) Barawal Dir Upper AVP.
30.	Mst. Sobia Tabassum (MC BS-17)	Sub Divisional Education Officer (Female) DI Khan	Sub Divisional Education Officer (Female) Domel Bannu.
31.	Mst. Farhat Yasmeen (MC BS-17)	Sub Divisional Education Officer (Female) Domel Bannu.	Sub Divisional Education Officer (Female) DI Khan
32.	Mst. Rizwana Pari (MC BS-17)	Sub Divisional Education Officer (Female) Khadu Khel Buner	Sub Divisional Education Officer (Female) Karak

Handwritten signature/initials



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9221588

33.	Mst. Shagufta Noreen (MC BS-17)	Assistant Director, Directorate of E&SE KP	Sub Divisional Education Officer (Female) Garhi Kapoora, Mardan AVP.
34.	Mst. Naseem Bukhari (MC BS-17)	Waiting for posting in Directorate of E&SE KP	Sub Divisional Education Officer (Female) Khyber AVP.
35.	Mst. Azra Afridi, ASDO (BS16)	Assistant Sub-Divisional Education Officer (Female) Daggar Buner	Sub Divisional Education Officer (Female) Dagga Buner in OPS.
36.	Mst. Salma ASDEO (BS-16)	Assistant Sub- Divisional Education Officer (Female) Batkheila.	Sub Divisional Education Officer (Female) Thana Baizai Malakand in OPS.

SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Endst: of Even No & date

Copy forwarded for information to the: -

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officers (Female) concerned.
4. District Accounts Officers concerned.
5. Director EMIS, E&SE Department with the request to upload the posting/
transfer notification on the official website of the department.
6. PS to Chief Secretary, Khyber Pakhtunkhwa.
7. PS to Minister for E&SE Department, Khyber Pakhtunkhwa.
8. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
9. Officers concerned.
10. Master file.


(HAFEEZ UR REHMAN SHAH)
SECTION OFFICER (SCHOOLS FEMALE)

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
 Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
 Phone No. 091-0221586

B
11

Dated Peshawar the, November 30th, 2021

5/10/4

NOTIFICATION
 SO(S/F) E&SED/4-16/2021/POSTING/TRANSFERS/MC: The Competent Authority is
 used to order the posting / transfer of the following SDEOs Female (BS-17) of
 Elementary & Secondary Education, Khyber Pakhtunkhwa, with immediate effect, in
 public interest: -

Sr. No.	Name	From	To
1	Mst Adeela Rani (MC BS-17)	SDEO (Female) Topi Swabi	SDEO (Female) Lora Abbottabad against the vacant post
2	Mst. Anisa Jamshed (MC BS-17)	SDEO (Female) Kumbar, Dir Lower.	SDEO (Female) Topi Swabi (vice Sr. No-1)
3	Mst. Naheed Fazal (MC BS-17)	SDEO (Female) Sheringale, Dir Upper.	SDEO (Female) Mansehra against the vacant post.
4	Mst. Malak Taj (MC BS-17)	SDEO (Female) Adezai, Dir Lower	SDEO (Female) Nowshera against the vacant post.

SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Subject: of Even No & date

is forwarded for information to the:-

- Accountant General, Khyber Pakhtunkhwa, Peshawar.
- Director E&SE Khyber Pakhtunkhwa, Peshawar.
- District Education Officers (Female) concerned.
- District Accounts Officers concerned.
- Director EMIS, E&SE Department with the request to upload the posting /
transfer notification on the official website of the department.
- PS to Minister for E&SE Khyber Pakhtunkhwa.
- PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
- Officers concerned.
- Master File.

(Signature)
 (HAFFEEZ UR REHMAN SHAH)
 SECTION OFFICER (SCHOOLS FEMALE)



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. (011) 9223344

Dated Peshawar the May 11th, 2022

NOTIFICATION

NO. SO(MC)E&SED/4-16/2021/POSTING/TRANSFER/MC] Mst. Malak Taja (MC BS-17) SDEO (Female) Nowshera is hereby transferred and directed to report to Directorate of Elementary & Secondary Education, Khyber Pakhtunkhwa, with immediate effect.

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Endst. of even No. & date:

Copy forwarded for information to the: -

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Female) Nowshera.
4. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
5. District Accounts Officer Nowshera.
6. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
7. Officer concerned.
8. Master file.


(JONAD SHAH)

SECTION OFFICER (Management Cadre)

SERVICE CERTIFICATE

Certified that Mr. Nisar Ul Mulk JA/32749 is a bona-fide (Defence Paid) Employee of Pakistan Military Accounts Department and presently serving in FPO AC (R) Nowshera .

Dated:- 15, Oct 2021


ACCOUNTS OFFICER
FPO AC (R) NOWSHERA

To

The Honourable Chief Secretary,
Govt. of Khyber Pakhtunkhwa, Peshawar

Subject: **REPRESENTATION / APPEAL AGAINST THE IMPUGNED
ORDER DATED 11.05.2022 PASSED BY THE
SECRETARY (E&SE) WHEREBY THE APPLICANT WAS
TRANSFERRED AND DIRECTED TO REPORT TO
DIRECTORATE (E&SE), KHYBER PAKHTUNKHWA**

Respected Sir

Most respectfully it is stated that:

1. The applicant while performing her duty as SDEO (F) Mardan was transferred from Mardan to SDEO (F) Adezai Dir Lower vide order dated 07.10.2021. **(Copy of Order dated 07.10.2021 is attached).**
2. After performing duty for about 50 days the applicant transferred as SDEO (Female) from Adezai Dir Lower to SDEO (Female) Nowshera against the vacant post vide order dated 30.11.2021. **(Copy of Order dated 30.11.2021 is attached).**

Diary No - 1763

691-9210124

205

16-5-22

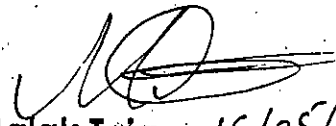
F 14

3. While serving for about 06 months in District Nowshera the applicant was prematurely been transferred and is directed to report to Directorate (E&SE) Khyber Pakhtunkhwa vide impugned order dated 11.05.2022 and made the applicant as an OSD Officer. **(Copy of impugned Order dated 11.05.2022 is attached).**
4. The impugned order dated 11.05.2022 is passed by the Secretary (E&SE) prematurely as the transfer has been made just after a period of 06 months.
5. The impugned order dated 11.05.2022 is passed against the posting /transfer policy of the Provincial government.
6. The impugned transfer order dated 11.05.2022 is passed against the wedlock policy as the husband of the applicant is also serving at District Nowshera. **(Copy of husband service certificate is attached)**
7. The impugned transfer order dated 11.05.2022 falls within the ambit of repeated transfer, that makes the order as void.

It is, therefore, most kindly requested that the transfer order dated 11.05.2022 may be set aside and the applicant be retained in District Nowshera.

I shall be very thankful to you.

Applicant



Mst. Malak Taja 16/05/22
Sub Divisional Education
Officer (Female) Nowshera



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9223588

F 17

No. SO(MC) E&SED/4-16/2022/PT/D-Appeal
Dated Peshawar the May 19th, 2022

To

Mst. Malak Taja,
Ex-SDEO (Female) Nowshera
Now at the disposal of Directorate of E&SE,
Khyber Pakhtunkhwa.

→ EOM
20-5-2022

Subject: - **DEPARTMENTAL APPEAL AGAINST POSTING/TRANSFER.**

I am directed to refer to your Departmental Appeal dated 16-05-2022 on the subject noted above and to state that your request for cancellation of posting/transfer notification was examined / processed; however, regretted.

Junaid Shah
19/5/22

(JUNAID SHAH)
SECTION OFFICER (Management Cadre)

Cc to the: -

1. Director E&SE Khyber Pakhtunkhwa.
2. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.

Junaid Shah
19/5/22

SECTION OFFICER (Management Cadre)



GOVERNMENT OF NWFP
ESTABLISHMENT & ADMINISTRATION
DEPARTMENT
(Regulation Wing)

POSTING / TRANSFER POLICY OF THE PROVINCIAL GOVERNMENT

- i) All the postings/transfers shall be strictly in public interest and shall not be abused/misused to victimize the Government servants
- ii) All Government servants are prohibited to exert political, Administrative or any other pressures upon the posting/transfer authorities for seeking posting/transfers of their choice and against the public interest.
- iii) All contract Government employees appointed against specific posts, can not be posted against any other post.
- iv) The normal tenure of posting shall be three years subject to the condition that for the officers/officials posted in unattractive areas the tenure shall be two years and for the hard areas the tenure shall be one year. The unattractive and hard areas will be notified by the Government.
- v) While making postings/transfer from settled areas to FATA and vice-versa, specific approval of Governor, NWFP needs to be obtained.
- vi) While making postings/transfers of officers/officials up to BS-17, from settled areas to FATA and vice-versa approval of the Chief Secretary NWFP needs to be obtained. Whereas, in case of posting/transfer of officers in BS-18 and above, from settled areas to FATA and vice versa, specific approval of the Governor NWFP shall be obtained.
- vi (a) All Officers/officials selected against Zone-I/FATA quota in the Provincial Services should compulsorily serve in FATA for atleast eighteen months in each grade. This should start from senior most scales/grades downwards in each scale/grade of each cadre.
- vii) Officers may be posted on executive/administrative posts in the Districts of their domicile except District Coordination Officers (D.C.Os) and DFOs/Superintendent of Police (SP). Similarly Deputy Superintendent of Police (DSP) shall not be posted at a place where the Police Station (Thaana) of his area/residence is situated.

Para-1(v) regarding months of March and July for posting/transfer and authorities for relaxation of ban deleted vide letter No: SOR-VI (E&AD) 1-4/2008/Vol-VI, dated 3-6-2008. Consequently authorities competent under the NWFP Government Rules of Business, 1985, District Government Rules of Business 2001, Posting/Transfer Policy and other rules for the time being in force, allowed to make posting/transfer subject to observance of the policy and rules. Added vide Urdu circular letter No. SOR-VI(E&AD)1-4/2003, dated 21-09-2004

ATTESTED

- viii) No posting/transfers of the officer's/officials on detailment basis shall be made.
- ix) Regarding the posting of husband/wife, both in Provincial services, efforts where possible would be made to post such persons at one station subject to the public interest.
- x) All the posting/transferring authorities may facilitate the posting/transfer of the unmarried female government Servants at the station of the residence of their parents.
- xi) Officers/officials except DCOs and DPOs/SPs who are due to retire within one year may be posted on their option on posts in the District of their domicile and be allowed to serve there till the retirement. DCOs and DPOs who are due to retire in the near future may also be posted in the District of their domicile subject to the condition that such posting would be against non-administrative posts of equivalent scales.
- xii) In terms of Rule-17(1) and (2) read with Schedule-III of the NWFP Government Rules of Business 1985, transfer of officers shown in column 1 of the following table shall be made by the authorities shown against each officer in column 2 thereof:

Outside the Secretariat		
1.	Officers of the all Pakistan Unified Group i.e. DMG, PSP including Provincial Police Officers in BPS-18 and above.	Chief Secretary in consultation with Establishment Department and Department concerned with the approval of the Chief Minister.
2.	Other officers in BPS-17 and above to be posted against scheduled posts, or posts normally held by the APUG, PCS(EG) and PCS(SG).	-do-
3.	Heads of Attached Departments and other Officers in B-18 & above in all the Departments.	-do-
In the Secretariat		
1.	Secretaries	Chief Secretary with the approval of the Chief Minister.
2.	Other Officers of and above the rank of Section Officers: a) Within the Same Department b) Within the Secretariat from one Department to another.	Secretary of the Department concerned. Chief secretary/Secretary Establishment.
3.	Officials up to the rank of Superintendent.	

¹ Added vide Urdu circular letter No: SCR-VI (E&ADYI-42)05, dated 9-9-2005.

ATTESTED

a) Within the same Department.	Secretary of the Department concerned.
b) To and from an Attached Department	Secretary of the Dept in consultation with Head of Attached Department concerned.
c) Within the Secretariat from one Department to another	Secretary (Establishment)

xiii) While considering posting/transfer proposals all the concerned authorities shall keep in mind the following:

- a) To ensure the posting of proper persons on proper posts, the Performance Evaluation Report/annual confidential reports, past and present record of service, performance on post held presently and in the past and general reputation with focus on the integrity of the concerned officers/officials be considered.
- b) Tenure on present post shall also be taken into consideration and the posting/transfers shall be in the best public interest.

xiv) Government servants including District Govt. employees feeling aggrieved due to the orders of posting/transfer authorities may seek remedy from the next higher authority / the appointing authority as the case may be through an appeal to be submitted within seven days of the receipt of such orders. Such appeal shall be disposed of within fifteen days. The option of appeal against posting/transfer orders could be exercised only in the following cases.

- i) Pre-mature posting/transfer or posting transfer in violation of the provisions of this policy.
- ii) Serious and grave personal (humanitarian) grounds.

2) To streamline the postings/transfers in the District Government and to remove any irritant/confusions in this regard the provision of Rule 25 of the North West Frontier Province District Government Rules of Business 2001 read with schedule - IV thereof is referred. As per schedule-IV the posting/transferring authorities for the officers/officials shown against each are as under:-

S. No.	Officers	Authority
1.	Posting of District Coordination Officer and Executive District Officer in a District.	Provincial Government.
2.	Posting of District Police Officer.	Provincial Government
3.	Other Officers in BPS-17 and above posted in the District.	Provincial Government
4.	Official in BPS-16 and below	Executive District Officer in consultation with District Coordination Officer.

ATTESTED

3. As per Rule 25(2) of the Rules mentioned above the District Coordination Department shall consult the Government if it is proposed to:

- a) Transfer the holder of a tenure post before the completion of his tenure or extend the period of his tenure.
- b) Require an officer to hold charge of more than one post for a period exceeding two months.

4. I am further directed to request that the above noted policy may be strictly observed /implemented.

All concerned are requested to ensure that tenures of the concerned officers/officials are invariably mentioned in summaries submitted to the Competent Authorities for Posting/Transfer.
(Authority: Letter No: SOR-VI/E&AD/1-4/2003 dated 24-6-2003).

It has been decided by the Provincial Government that posting/transfer orders of all the officers up to BS-19 except Heads of Attached Departments irrespective of grades will be notified by the concerned Administrative Departments with prior approval of the Competent Authority obtained on the Summary. The Notifications/orders should be issued as per specimen given below for guidance.

All posting/transfer orders of BS-20 and above and Heads of Attached Departments (HAD) shall be issued by the Establishment Department and the Administrative Departments shall send approved Summaries to E&A Department for issuance of Notifications.

SPECIMEN NOTIFICATION.

GOVERNMENT OF NWFP
NAME OF ADMINISTRATIVE
DEPARTMENT

Dated Peshawar, _____

NOTIFICATION

NO. _____ The Competent Authority is pleased to order the transfer of Mr. _____ Department and to post him as _____ in the interest of public service, with immediate effect.

CHIEF SECRETARY
GOVERNMENT OF NWFP

Encl. No. and date even.
Copy forwarded

- 1.
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ATTESTED

(NAME)
SECTION OFFICER
Administrative Department

(Authority: Letter No. SO (E-D) E&AD/9-12/2006 dated 22-12-2006)

The competent authority has been pleased to direct that Para 1(v) of the Posting/Transfer Policy contained in this Department letter No:SOR-I (E&AD) 1-1/85 Vol-II, dated 15-2-2003 shall stand deleted, with immediate effect, consequently allowing the authorities, competent under the NWF Government Rules of Business, 1985 and the District Government Rules of Business, 2001 or any other rules for the time being in force, to make posting/transfers of Government servants, any time during the year, in genuinely deserving and necessary cases, in public interest, subject to strict observance of all other provisions of posting/transfer policy contained and notified vide circular letter under reference. Hence there will be no ban on posting/transfer of Government Servants in any part of the year while carrying out postings/transfers of Government Servants.

The authorities concerned will ensure that no injustice whatsoever is caused to any civil servant, public work is not suffered and service delivery is improved.

I am therefore directed to request that the provisions of posting/transfer policy, as amended to the extent above, may kindly be followed in letter and spirit in future so as to keep good governance standard in this regard.
(Authority: Letter No: SOR-VI (E&AD) 1-1/2008/Vol-VI, dated 3-6-2008).

.....
According to the policy of the provincial Government, maximum tenure on a post is three years. Contrary to the Policy, Store Keepers, Cashiers, Accountants and other ministerial staff remains posted in their particular field for long time, which may result in misuse of this position, due to which not only public exchequer may sustain loss but general public also suffers. The Provincial Government has taken serious notice of this situation & decided that all Administrative Secretaries and DCOs may submit a certificate within one month to the effect that above mentioned officials, having completed three years on their posts, have been adjusted on posts other than those they held previously.
(Authority: Urdu circular No: SOR-VI (E&AD) 105 dated 28th Oct, 2005.)
.....

The Chief Minister NWFP has directed that:-

- i) Submission of summary would not be required in case of mutual transfer.
- ii) Posting/transfer shall be made according to the policy;
- iii) Government Servants shall avoid direct submission of applications to the Chief Minister;
- iv) In genuinely deserving case, they should approach the Administrative Secretaries who could process the case according to policy;

ATTESTED

v) In case of direct submission of application to the Chief Minister Secretariat for Posting/ Transfer, the concerned govt servants shall be proceeded against under the prevalent rules and regulations.

(Authority: Urdu circular No: SOR-VI/E&AD/1-4/2003, dated 86-2004. Urdu Letter No: SOR-VI/E&AD/Misc: /2005, dated 3-1-2005.)

It has been decided with the approval of the competent authority that:-

- i) Mutual transfer would be allowed if both the concerned employees agree; except the Government Servants holding Administrative posts;
- ii) NWFP Government Rules of Business 1985 shall be observed while issuing posting/transfer orders.

(Authority: - Urdu circular letter No: SOR (E&AD)/1-4/2005, dated 9-9-2005)

The competent authority has decided that in order to maintain discipline, enhance performance of the departments and ensure optimum service delivery to the masses, the approved /prevalent policy of the posting/transfer shall be strictly followed. Government Servants violating the policy and the NWFP Govt Servants (Conduct) Rules 1987 shall be proceeded against under the NWFP Removal from Service (Special Powers) Ordinance 2000. As required under the NWFP Govt Rules of Business 1985, the Administrative Secretaries shall ensure compliance with the policy and defaulting offices/officials be taken to task & entries to this effect shall be made in their PERs/ACRs. In case subordinate officers are working on sites or proceeding for the purpose of inspection, they shall submit inspection Report to their Administrative Secretariat. Administrative Secretaries shall ensure submission of such reports.

(Authority: - Urdu circular No: SOR-VI (E&AD)/1-1/06, dated: 29-6-2007)

PLACEMENT POLICY.

In order to utilize the expertise of the officers who have received foreign training in various fields, the provincial Government has decided to adopt the Placement Policy, approved by the Prime Minister of Pakistan, and make it a part of its Posting/Transfer Policy. Placement Policy as follows:-

- i) All placements would be made on the basis of merit and keeping in view the needs of the organization.
- ii) The first priority in placement must go the parent organization of the participant from where the individual had applied. This will be in consonance with the concept of establishing the "Need" for the department and fulfilling the need through "capacity building for the organization.
- iii) In order to follow the "bottom up approach" for Devolution, the priority within departments must go to the Districts, the Provinces and than the Federal Government.
- iv) The second priority in placement should go to up-grading the existing training Institution within the country. The knowledge gained by the

1 Placement Policy has been made part of the posting/transfer policy vide Urdu circular No SOR-VI/E&AD/1-4/06, dt 9-9-2007

APPROVED

mushkalawati

officers, will be of immense value to bring about a qualitative change in the training institutions. The following proposals are made in this regard:

- a) Permanent posting of an officer to the training institutions for 2-3 years;
 - b) Temporary attachment with the training institutions for 3 to 6 months for some research project on helping in developing case studies;
 - c) Earmarked as a visiting faculty member for specific subject.
- v) Individuals posted to their parent organizations will also organize training for their subordinates within the department, in order to transfer the knowledge and bring about a qualitative change internally;
 - vi) The Normal tenure of posting as already provided in the policy would be ensured;
 - vii) No participant should be allowed to be posted on deputation to multinational donor agencies for at least 5 years;
 - viii) No participant will decline/represent against his/her posting.

ATTESTED

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GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
(REGULATION WING)
NO. SOR.VI (E&AD) 1-4/2005/Vol-II
Dated Peshawar, 27th February, 2013

Government of Khyber Pakhtunkhwa
Establishment Department
Peshawar

To
Handwritten recipient information.

- 1. The Additional Chief Secretary (P&D), Khyber Pakhtunkhwa.
- 2. The Additional Chief Secretary (FATA), Khyber Pakhtunkhwa.
- 3. All Administrative Secretaries to Govt. of Khyber Pakhtunkhwa.
- 4. All Commissioners in Khyber Pakhtunkhwa.

Subject: CONSTITUTION PETITION NO.23 OF 2012 OUT OF SUO MOTO CASE NO. 3/2012 (PETITION BY MS. ANITA TURAB FOR PROTECTION OF CIVIL SERVANTS REGISTERED UNDER ARTICLE 184 (3) OF THE CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN 1973.)

Sir,

I am directed to refer to the subject noted above and to state that the Supreme Court of Pakistan vide the subject cited judgment, has enunciated the following principles of Law with regard to protection and conduct of civil servants.

(i) **Appointments, Removals and Promotions:** Appointments, removals and promotions must be made in accordance with the law and the rules made thereunder, where no such law or rule exists and the matter has been left to discretion, such discretion must be exercised in a structured, transparent and reasonable manner and in the public interest.

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(ii) **Tenure, Posting and Transfer:** When the ordinary tenure for a posting has been specified in the law or rules made thereunder, such tenure must be respected and cannot be varied, except for compelling reasons, which should be recorded in writing and are judicially reviewable.

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(iii) Illegal Orders: Civil Servants owe their first and foremost allegiance to the law and the constitution. They are not bound to obey orders from superiors which are illegal or are not in accordance with accepted practices and rule-based norms. Instead, in such situations, they must record their opinion and, if necessary, dissent.

(iv) OSD: Officers should not be posted as OSD except for compelling reasons, which must be recorded in writing. If at all an officer is to be posted as OSD, such posting should not exceed 03 months. If there is a disciplinary inquiry going against him/her such inquiry must be completed at the earliest. The officer on special duty may be posted against a post of his/her equivalent pay scale/grade within 03 months of his/her order as OSD.

2. I am, therefore, directed to request you to note the above principles of law for strict compliance.

Yours faithfully,

NAJAM
(NAJ-MUS-SAHAR)
SECTION OFFICER (REG-VI)

Encl: as above.

A copy is forwarded to:-

1. The Principal Secretary to Governor, Khyber Pakhtunkhwa.
2. The Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
3. The Secretary Provincial Assembly, Khyber Pakhtunkhwa.
4. The Accountant General, Khyber Pakhtunkhwa.
5. The Registrar, Peshawar High Court, Peshwar.
6. The Secretary Khyber Pakhtunkhwa, Public Service Commission.
7. All Addl. Secretaries Establishment & Administration Department.
8. All Deputy Secretaries in Establishment & Administration Department.

NAJAM
SECTION OFFICER (REG-VI)



GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT

(REGULATION WING)

No. SOR-VI/EA/1-4/2010/Vol-VIII
Dated Peshawar, the 07th August, 2012

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To

3. The Additional Chief Secretary, Planning & Development Department, Government of Khyber - Pakhtunkhwa, Peshawar.
2. The Additional Chief Secretary (FATA), FATA Secretariat, Peshawar.
3. The Senior Member, Board of Revenue, Khyber Pakhtunkhwa.
4. All the Administrative Secretaries to Government of Khyber Pakhtunkhwa.
5. All the Divisional Commissioners in Khyber Pakhtunkhwa.
6. All Heads of the Attached Departments in Khyber Pakhtunkhwa.
7. All the District Coordination Officers in Khyber Pakhtunkhwa and Political Agents in FATA.

Subject: POSTING OF SERVING HUSBAND/WIFE AT THE SAME STATION OF THE PROVINCIAL GOVERNMENT.

Dear Sir,

I am directed to refer to the subject noted above and to state that keeping in view the Socio economic Problems and hardships faced by husbands and wives in Government Service due to posting at different station of duty, the competent authority has been pleased to prescribe the following guideline to facilitate posting of husband and wife at the same station:-

- i) Where a request is made for posting at a different station in the same department/service/cadre in which an employee is already serving, the request may be accepted subject to availability of a post in the same BPS.
- ii) If request involves temporary deputation to another department, it may be processed in consultation with the concerned department and may be accepted on the prescribed terms of deputation subject to availability of a post in the same BPS.

iii) If there is a tie between two or more Government servants for posting at the same station in the same department/unit of an

Commissioner Peshawar
D No 916-2 Dated 16/8/12

AC(R)

16/8/12
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organization, the Government servant with greater length of service may be preferred.

(iv) Request for posting by a spouse facing serious medical problems may be accorded highest priority.

v) Spouses already posted at one station, including those posted on deputation may normally not be disturbed without compelling reasons of public interest. Requests for extension of deputation period beyond the permissible limit may be considered with compassion if interests of public service would permit.

2. Kindly acknowledge receipt.

Yours faithfully,

NAJ MUS SAHAR
7/8/12

(NAJ-MUS-SAHAR)
SECTION OFFICER (REG:VI)

Endst No. & date even.

Copy forwarded to:

1. The Secretary to Governor, Khyber Pakhtunkhwa.
2. The Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
3. The Registrar, Peshawar High Court, Peshawar.
4. The Registrar, Khyber Pakhtunkhwa Service Tribunal, Peshawar.
5. The Director General, Provincial Disaster Management Authority.
6. All Additional Secretaries, Deputy Secretaries and Section Officers in Establishment & Administration Department.
7. Private Secretaries to all Provincial Ministers in Khyber Pakhtunkhwa.
8. PSO to Chief Secretary Khyber Pakhtunkhwa, Peshawar.
9. Private Secretary to Secretary Establishment Department.
10. Private Secretary to Secretary Administration Department.
11. The Incharge Resource Centre, Estt. & Admn. Department.

NAJ MUS SAHAR
7/8/12
SECTION OFFICER (REG: VI)

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Amud

VAKALAT NAMA

NO. _____/2021

IN THE COURT OF KP Service Tribunal Peshawar

Malak Taja

(Appellant)
(Petitioner)
(Plaintiff)

VERSUS

Chief Secretary & others

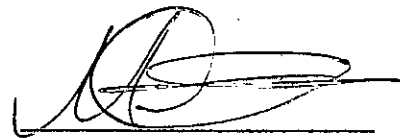
(Respondent)
(Defendant)

I/We, Malak Taja


Do hereby appoint and constitute **Taimur Ali Khan, Advocate High Court Peshawar**, to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.

I/We authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

Dated _____/2021


(CLIENT)

ACCEPTED


TAIMUR ALI KHAN
Advocate High Court
BC-10-4240

CNIC: 17101-7395544-5
Cell No. 0333-9390916

OFFICE:

Room # FR-8, 4th Floor,
Bilour Plaza, Peshawar,
Cantt: Peshawar

"B"

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.**

No.

Appeal No..... of 20 .

.....⁸¹⁹ Appellant/Petitioner
Mst. Malak Verfuja

..... Respondent
The Chief Secy: KPK Respondent No.....
1

Notice to: — The Chief Secretary KPK Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this.....

Day of.....20 . 1st

June 22

for Reply

[Signature]
03-6-22

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

“B”

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD, PESHAWAR.

S.B

No.

Appeal No. 819 of 20 22

Mst. Malan Toja Appellant/Petitioner

Versus

The Chief Secy: KPK Respondent

Respondent No. 2

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3/6

Notice to: - The Secretary F&SE KPK Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 13/6/22 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No. dated~~

Given under my hand and the seal of this Court, at Peshawar this 1st June 20 22

Day of June 20 22

for Reply

[Handwritten signature]

Registrar,
 Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
 2. Always quote Case No. While making any correspondence.

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR. S.B

No. -

Appeal No. 819 of 2022

Mst. Malak Taja Appellant/Petitioner

Versus

The Chief Secy KPN Respondent

Respondent No. 3

Notice to: The Director ERSE KPN Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal ~~*on.....13/6/22.....at 8.00 A.M.~~ If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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Given under my hand and the seal of this Court, at Peshawar this 1st 15

Day of June 20 22

for Reply  

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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