

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR
AT CAMP COURT ABBOTTABAD

Service Appeal No. 10536/2020

Date of institution 04.08.2020

Mst. Nazia Sultana, PHST, GGPS Shewaral Tehsil Ghazi District Haripur.

VERSUS

Government of Khyber Pakhtunkhwa, through Secretary Elementary and Secondary Education, Peshawar and three others.

ORDER
23.12.2021

Mr. Nasrullah Khan Jadoon, Advocate, for the appellant present. Mr. Riaz Ahmad Paindakhel, Assistant Advocate General for the respondents present and produced adjustment order of the appellant bearing Endst: No. 9142-48 dated 21.12.2021, which is placed on record.

Learned counsel for the appellant stated at the bar that the respondents has issued adjustment order of the appellant bearing Endst: No. 9142-48 dated 21.12.2021, whereby the appellant performing her duty at GGPS Darra Ghazi has been adjusted at GGPS Sherawal Ghazi, therefore, her grievance has been redressed and requested for withdrawal of the instant appeal. In this respect, written endorsement of learned counsel for the appellant obtained at the margin of order sheet.

In light of the above, the appeal in hand stands dismissed as withdrawn. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
23.12.2021

(MIAN MUHAMMAD)
MEMBER (EXECUTIVE)
CAMP COURT ABBOTTABAD

(SALAH-UD-DIN)
MEMBER (JUDICIAL)
CAMP COURT ABBOTTABAD

Respondant redress the petitioner and transfer her to GGPS Sherawal Ghazi. Wide transfer order No. 9142-48 dated 21/12/2021 to with draw the instant petition. Nasrullah Khan Jadoon here for petitioner no need to continue this petition & requested



OFFICE OF THE
DISTRICT EDUCATION OFFICER (FEMALE)
HARIPUR

(Office Phone No. 09995-920154-155)

NO. _____

Date _____ / _____ / 2021.

Adjustment Order.

On the Order of Honorable Khyber Pakhtunkhwa Services tribunal Peshawar Abbottabad Bench appeal No 9410-2020 dated 20-12-2021 competent authority is pleased to issue the following adjustment order in the best interest of public service.

S.No	Name & Designation	Present place of posting	Adjusted at	Remarks
1	Mst; Nazia Sultan PSHT	GGPS Darra Ghazi	GGPS Sherawal Ghazi	Vice S.No. 2
2	Mst: Wasia Begum PSHT	GGPS Sherawal Ghazi	GGPS Darra Ghazi	Vice S.No. 1

- Note:-1. No T.A /D.A is allowed
2.. Charge report is submitted to all concerned

sd-
District Education Officer (F)
Haripur

Endst: No. 9/42-48
Copy to the :-

Dated 21 / 12 / 2021

1. Director Elementary & Secondary Education KPK Peshawar
2. Chairman Khyber Pakhtunkhwa Service tribunal Peshawar Atd Bench.
3. Deputy Commissioner Haripur.
4. District Account Officer Haripur.
5. District Monitoring Officer Haripur.
6. Sub Divisional Education Officer (F) Ghazi.
7. ASDEO Circle concerned .
8. Office File.

[Signature]
District Education Officer (F)
Haripur



OFFICE OF THE
DISTRICT EDUCATION OFFICER (FEMALE)
HARIPUR

(Office Phone No. 09995-920154-155)

NO. 9149

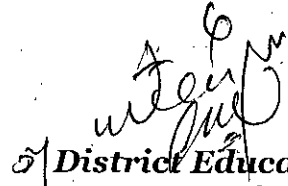
Date 21/12 2021.

To

The Honorable Chairman,
Khyber Pakhtunkhwa Services tribunal Peshawar Abbottabad.

Subject: ORDER IN EXECUTION PETITION NO.10536/2020 Mst:NAZIA SULTANA
Up on proposal by SDEO (F) Ghazi Mst Wasia Begum PSHT was adjusted from GGPS Ghari amaira to GGPS Sherawal and Mst: Nazia Sultana PSHT was adjusted from GGPS Sherawal to GGPS Darra Ghazi vide Endstt: 13655-60 dated 02-05-2020.

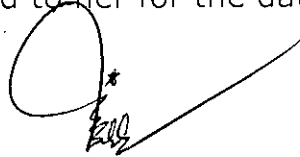
Later on Mst Nazia Sultana filed on appeal before the chairman of Khyber Pakhtunkhwa Services tribunal Peshawar Abbottabad bench vide appeal No 9410/2020 and adjustment order are hereby made by the undersign favor of Mst: Nazia Sultana by the undersigned and adjusted her at GGPS Sherwal vide No 91142-448 Dated 21-12-2021


District Education Officer (F)
Haripur

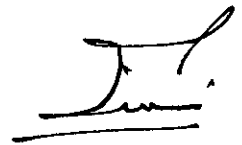
20.12.2021

Husband of the appellant alongwith clerk of learned counsel for the appellant present. Mr. Jehangir Akhtar, Litigation Assistant alongwith Mr. Riaz Ahmad Pindakhel, Assistant Advocate General for the respondents present.

Representative of the department requested that due to Election duty, District Education officer (Female) is unable to appear before the Tribunal today, therefore, an adjournment may be granted for personal appearance of District Education Officer (Female) before the Tribunal. In light of observations given in order dated 18.11.2021, to come up for personal appearance of District Education Officer (Female) before the D.B at Camp Court Abbottabad on 23.12.2021. Notice has not been issued to private impleaded respondent No. 4, therefore, notice also be issued to her for the date fixed.



(Mian Muhammad)
Member (E)
Camp Court A/Abad



(Salah-ud-Din)
Member (J)
Camp Court A/Abad

18.11.2021

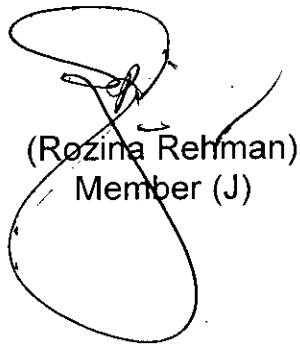
Counsel for appellant present.

Muhammad Riaz Khan Paindakheil, learned Assistant Advocate General alongwith Saeed ur Rehman Additional Litigation Officer for official respondents present.


An application for impleadment of Teacher namely Wasia Begum was submitted on previous date being a necessary party because if the appeal is accepted, she will have to vacate the post to appellant. The learned A.A.G has also got no objection on her impleadment. She is impleaded as respondent. Entry of her name be made in the panel of respondents with red ink and notice of appeal be given to her for next date. We have noticed the presence of a letter dated 08.04.2020 sent to the Secretary Higher Education Department Government of Khyber Pakhtunkhwa with attention of the District Education Officer (Female) Haripur written under the approval of AAG Lt. Col. Muhammad Farooq Ahmad. According to note on the said letter, the same is a computer generated document requiring no signature. According to the said letter, request of the newly impleaded respondent has been conveyed to the Civil Authorities in the Education Department and according to the reason mentioned in the impugned transfer order, the District Education Officer (Female) religiously implemented the said letter by issuing the impugned transfer order. Let the District education officer (Female) be given notice for her personal attendance on the next date to justify the transfer on touchstone of the policy of the Government. To come up on 20.12.2021 before D.B at Camp Court, Abbottabad

We have also been informed that the salary of the appellant is stopped despite the fact that she took over the charge in compliance with the impugned order in GGPS Dara Ghazi on 18.08.2020. On query from the representative of respondent No.3, he stated that he attended this Tribunal in connection with another matter and though is in attendance but he is not in a position to apprise us as to why the salary of the appellant has been stopped. The respondent No.3 while attending this Tribunal as hereinbefore directed, shall have to explain the position as to

stoppage of salary of the appellant when she as per stance of her counsel is performing her duties in GGPS Dara Ghazi. Copy of this order be handed over to the representative for its placing before the respondent No.3 notice about the directions given today.



(Rozina Rehman)
Member (J)

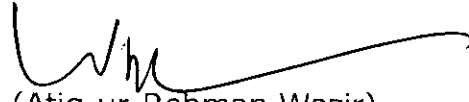


Chairman
Camp Court, A/Abad

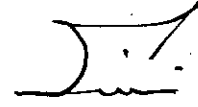
23:09.2021

Mr. Zahid Iqbal, Husband of the appellant present. Mr. Riaz Khan Paindakheil, Assistant Advocate General for the respondent present.

An application for impleadment of Wasia Begum (PSHT GGPS Sherawal Tehsil Ghazi District Haripur) as respondent submitted by husband of the appellant, which is placed on file. To come up for reply/arguments on impleadment application before the D.B on 18.11.2021 at Camp Court Abbottabad.



(Atiq-ur-Rehman Wazir)
Member (Executive)
Camp Court, Abbottabad



(Salah-ud-din)
Member (Judicial)
Camp Court, Abbottabad

16.03.2021

Appellant present through counsel.

Asif Masood Ali Shah learned Deputy District Attorney alongwith Muhammad Salih Mushtaq ADO for respondents present.

Former requests for adjournment in order to seek amendment. All relevant documents were submitted by the representative of the Department which show that the appellant has assumed the charge, therefore, legally entitled to her salary and which would be released accordingly. Representative is directed to produce entire record in respect of payment of salary to the appellant as well as opening of her salary account before date. To come up for further proceedings on 22/4/2021 before D.B at Camp Court Abbottabad.



(Atiq ur Rehman Wazir)
Member (E)
Camp Court, A/Abad



(Rozina Rehman)
Member (J)
Camp Court, A/Abad

22.4.21

*due to COVID 19, case is adjourned
to 23.9.2021 for the same.*



Heads

19.01.2021

Due to COVID-19, the case is adjourned for the same on 13.02.2021 before D.B.

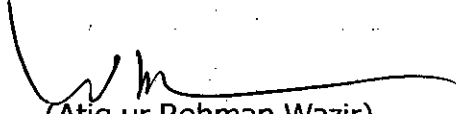

READER

18.02.2021

Husband of the appellant present.

Noor Zaman Khattak learned District Attorney alongwith Ahsan ADO for respondents present.

Representative of respondents submitted reply/comments which is placed on file. To come up for rejoinder if any, and arguments on 19.03.2021 before D.B at Camp Court, Abbottabad.



(Atiq ur Rehman Wazir)
Member (E)
Camp Court, A/Abad


15.03.2021

Appellant present through counsel.

Asif Masood Ali Shah learned Deputy District Attorney alongwith Muhammad Nazeer S.C for respondents present.

As per contention of learned counsel for appellant salary of appellant has been stopped by the respondents despite the fact that she has assumed charge against the post, therefore, representative of the respondents is directed to produce record and to explain as to why the salary of the appellant has been stopped. To come up on 16.03.2021 for further proceedings before D.B at Camp Court Abbottabad.


(Atiq ur Rehman Wazir)
Member (E)
Camp Court, A/Abad


(Rozina Rehman)
Member (J)
Camp Court, A/Abad

17.11.2020

Counsel for appellant is present. Mr. Usman Ghani, District Attorney for the respondents is also present.

Neither written reply on behalf of respondents submitted nor representative of the department is present, therefore, learned District Attorney is directed to contact the respondents and furnish written reply/comments on the next date positively. File to come up for submission of written reply/comments for 19.01.2021 before S.B at Camp Court, Abbottabad.

(MUHAMMAD JAMAL KHAN)
MEMBER
CAMP COURT ABBOTTABAD

16.09.2020

Counsel for the appellant present.

Contends that after having appointed as PST, the appellant remained under transfer frequently. On 22.09.2018 she was transferred to GGPS Shewaral and after about twenty months was again transferred to Dara Ghazi on 02.05.2020. The impugned act of the respondents is not only violative of transfer/posting policy of Provincial Government wherein a larger tenure is provided for the purpose but also the appellant has been transferred out of the respective Union Council.

Subject to all just exceptions, instant appeal is admitted to regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 14.10.2020 before S.B at Camp Court Abbottabad.

Alongwith the appeal there is an application for suspension of order dated 02.05.2020. Notice of the application be also given to the respondents for the date fixed.


Chairman


14.10.2020

Brother of the appellant on behalf of the appellant is present.

Mr. Kabirullah, Khattak, Additional Advocate General alongwith Mst. Saima Raza, ADEO for respondents present.

Written reply on behalf of respondents not submitted. According to the learned Addl: AG the case pertains to territorial limits of Hazara Division, but inadvertently fixed on principle seat, therefore, office is directed to fix the instant appeal at camp court Abbottabad for further proceedings.

Adjourned to 17.11.2020 for written reply of respondents before S.B at camp court Abbotabad.


(Attiq Ur Rehman Wazir)
Member (E)

Appellant Deposited
Security & Process Fee

This is an appeal filed by Mst. Nazia Sultana today on 04/08/2020 against the order dated 02.05.2020 against which she preferred/made departmental appeal/ representation on 18.06.2020 the period of ninety days is not yet lapsed as per section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, which is premature as laid down in an authority reported as 2005-SCMR-890.

As such the instant appeal is returned in original to the appellant/Counsel. The appellant would be at liberty to resubmit fresh appeal after maturity of cause of action and also removing the following deficiencies.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Annexures of the appeal may be attested.
- 3- Annexures of the appeal may be flagged.
- 4- Affidavit may be got attested by the Oath Commissioner.
- 5- Annexures of the appeal are not in sequence which may be annexed serial wise as mentioned in the memo of appeal.
- 6- Two more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1959/ST,

Dt. 04/8 /2020.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Nasrullah Khan Adv.
High Court A. Abad

I removed all the objection mentioned above and resubmit the appeal and on page no (13) Assistant Director (female) E&SE KPK reply the appeal of appellant and directed to DEO female Haripur to further necessary action as per policy rules. but DEO refused to do in accordance with law. department replied the appeal of appellant that this appeal is not pre-mature. kindly leaving it in accordance with law

Sir,

The objection of this office and reply of counsel for the appellant is submitted for order please.

Nasrullah Khan
advocate for
appellant
11/8/2020

Honble Chairman.

11/8/2020
Defied before SB after objections on 17/8/2020.

11/08

BEFORE THE CHAIRMAN KHYBER PAKHTUNKHWA,
SERVICE TRIBUNAL PESHAWAR

Mst. Nazia Sultana, PHST, GGPS Shewaral Tehsil Ghazi District Haripur.

....APPELLANT

VERSUS

Govt. of KPK, through Secretary Elementary and Secondary Education,
Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

INDEX

S.#	Description	Page No.	Annexure
1.	Memo of Appeal	1 to 8	
2.	Copy of order Endst. No. 13655-60 dated 02/05/2020	9 to 24	"A"
3.	Wakalatnama	25	

Nazia Sultana
...APPELLANT

Through

Dated: _____/2020

Nasrullah Khan Jadoon
(Nasrullah Khan Jadoon)
Advocate High Court, Abbottabad

BEFORE THE CHAIRMAN KHYBER PAKHTUNKHWA,
SERVICE TRIBUNAL PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

10536/20

Diary No. 8238

Dated 04/8/2020

Mst. Nazia Sultana, PHST, GGPS Shewaral Tehsil Ghazi District Haripur.

....APPELLANT

VERSUS

1. Govt. of KPK, through Secretary Elementary and Secondary Education, Peshawar.
2. Director Elementary & Secondary Education, KPK, Peshawar.
3. District Education Officer, Female, Haripur.

impleaded
vide order
sheet dated
18/11/21

4. Wasia Begum (PHST GGPS Shewaral Tehsil Ghazi District Haripur).

....RESPONDENTS

SERVICE APPEAL UNDER SECTION 4 OF KPK

SERVICE TRIBUNAL ACT, 1974 FOR

DECLARATION TO THE EFFECT THAT THE

APPELLANT IS PERMANENT RESIDENT OF

SHEWARAL AND SHE WAS INDUCTED AS PHST

IN THE RESPONDENT'S DEPARTMENT VIDE

ORDER DATED 29/03/2000. THE APPELLANT

TRANSFER VARIOUS TIME DURING HER

SERVICE, LASTLY SHE WAS TRANSFER DATED

22/09/2018 IN GGPS SHERWAL AND RESPONDENT

NO. 3 WITHOUT LEGAL JUSTIFICATION

MALAFIDE AGAIN TRANSFER APPELLANT FROM

Filed to-day

Registrar

4/8/2020

SHERWAL TO DARA GHAZI VIDE ORDER DATED
02/05/2020 WHICH IS PERVERSE,
DISCRIMINATORY, AGAINST THE LAW AS WELL
AS THE TENURE/ TRANSFER POLICY.

PRAYER:- ON ACCEPTANCE OF THE INSTANT
SERVICE APPEAL, IT IS PRAYED THAT THE
TRANSFER ORDER OF APPELLANT DATED
02/05/2020 MAY GRACIOUSLY BE SET ASIDE AND
APPELLANT TRANSFER TO SHERWAL IN HER
NATIVE UNION COUNCIL. ANY OTHER RELIEF
WHICH THIS HONOURABLE TRIBUNAL DEEMS
APPROPRIATE IN THE CIRCUMSTANCES OF THE
CASE MAY ALSO BE GRANTED TO THE
APPELLANT.

Respectfully Sheweth:-

1. That the appellant is serving as PHST in GGPS Shewaral and has been transferred from GGPS Shewaral to GGPS Darra vide impugned transfer order Endst. No. 13655-60 dated 02/05/2020. Copy of order Endst. No. 13655-60 dated 02/05/2020 is attached as Annexure "A".

2. That the appellant is permanent resident of Shewaral whereas the place of present posting is hundred miles away from the place of abode of the appellant. It would hardly be possible for the appellant to approach GGPS Dara from her residence.
3. That there are vacant posts in union council. The competent authority without adhering to the rule in vogue illegally transfer appellant from GGS Shewaral to GGPS Dara.
4. That it is, further submitted that the impugned transfer order dated 02/05/2020 which has been received by the appellant on 06/05/2020 is premature, against the rule on the subject and competent authority i.e. DEO Female Haripur has issued the same with malafide intention and to accommodate blue eyed having political backing. Law favours decision on merits without fear and favour. Therefore, impugned transfer order to the extent of appellant is liable to be set-aside.
5. That it is worth mentioning that appellant being female employee is serving in the education

department since 2000 to till date and in this period of service, the appellant was posted once in a school which was near to the place of her residence only for a period w.e.f 22/09/2018 to 02/05/2020, hence, the appellant belongs to a helpless family having no political backing and influence to get her due right of service.

6. That the instant service appeal is within the period of limitation.
7. That matter relates to the terms and condition of services, therefore, this Honourable Tribunal has jurisdiction to entertain the instant service appeal.

GROUND S;-

- a. That order of respondent No. 3 is against law, rule and policy hence is liable to be set aside.
- b. That this fact may not led to fade in the oblivion that no law policy debar the appellant to have posting in her native union council.

c. That the order of respondent No. 3 is against on the rule on the subject and with malafide intention and alter-motive to accommodate the blue eyed having political backing her liable to be set aside.

d. That there is no other prompt, efficacious remedy, available to the appellant except the instant appeal.

e. That other points shall be raised before the Honourable Tribunal at the time of arguments.

In view of the above it is prayed that impugned transfer order dated 02/05/2020 to the extent of the appellant may graciously be set-aside, so as to enable her to serve the department with a peace of mind.

Nazim Sultana
...APPELLANT

Through

Dated: 4-8- /2020

Nasrullah Khan Jadoon
(Nasrullah Khan Jadoon)
Advocate High Court, Abbottabad

VERIFICATION:-

Verified on oath that the contents of forgoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.

ATTESTED

Nazim Sultana
APPELLANT

4-8-2020

BEFORE THE CHAIRMAN KHYBER PAKHTUNKHWA,
SERVICE TRIBUNAL PESHAWAR

Mst. Nazia Sultana, PHST, GGPS Shewaral Tehsil Ghazi District Haripur.

....APPELLANT

VERSUS

Govt. of KPK, through Secretary Elementary and Secondary Education,
Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, Mst. Nazia Sultana, PHST, GGPS Shewaral Tehsil Ghazi District Haripur,
do hereby solemnly affirm and declare that the contents of foregoing appeal
are true and correct to the best of my knowledge and belief and nothing has
been concealed from this Honourable Court.

Nazia Sultana
....DEPONENT

ATTESTED



BEFORE THE CHAIRMAN KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.

Appeal No. 10536 /2020

Mst. Nazia Sultana, PHST, GGPS Shewaral Tehsil Ghazi District Haripur.

...APPELLANT

V E R S U S

Govt. of KPK, through Secretary Elementary & Secondary Education,
Peshawar and others

...RESPONDENTS

SERVICE APPEAL

APPLICATION FOR SUSPENSION OF THE IMPUGNED ORDER
DATED 02.05.2020 VIDE WHICH THE APPLICANT/APPELLANT
HAS BEEN TRANSFERRED FROM G.G.P.S SHEWARAL TO
GGPS DARRA, TILL FINAL DECISION OF THE INSTANT
APPEAL.

Respectfully Sheweth,

1. That the above titled Appeal is filed before this Honourable Tribunal, the contents of the same may be treated as an integral part of this application.
2. That the applicant/appellant has a good Prima-Facie case and balance of convenience also lies in her favour.
3. That if the impugned order of respondent authority is not suspended then applicant/appellant would suffer irreparable loss and the purpose of filing instant Service Appeal would become infructuous.

It is, therefore, humbly prayed that on acceptance of the foregoing Application, the order dated 02.05.2020 passed by the respondent authority may kindly be suspended till final disposal of the titled Service Appeal.

Nazim Sultana
...APPELLANT

Through:

Dated: _____/2020

Nasrullah Khan
(NASRULLAH KHAN JADOON)
Advocate High Court, Abbottabad.

AFFIDAVIT:-

I, Mst.Nazia Sultana, PHST, GGPS Shewaral Tehsil Ghazi District Haripur, **Appellant**, do hereby solemnly affirm and declare on Oath that the contents of instant **Application** are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Court.

Nazia Sultana
DÉPONENT

Dated:- 4-8 /2020

...APPELLANT

ATTESTED





Office of the District Education Officer Female (Haripur)

PHONE NO 0995-980184

Order

Attested
Nasrullah Khan

As proposed by the SDEO Ghazi the following Teachers are hereby adjusted in different schools on the reasons mentioned against their names on their own pay and grade/scale in the best interest of public service with immediate effect

S NO	Name of Teachers/Designation	From	To	Remarks
1	Wasea Begum PSIII	GGPS Garhi Mura	GGPS Sherawal	Being widow of Shaloo soldier
2	Nazia Sultana PSIII	GGPS Sherawal	GGPS Datta	On Vacant Post/Need bases
3	Rabeha Naz PSII	GGPS Lohana	GGPS Datta	On Vacant Post/Need bases

1. No T.A. D.A is allowed
2. Charge report should be submitted to all concerned

Samina Altaf
 (Samina Altaf)
 District Education Officer
 Haripur

Endst. No. Dated

20-05-2011

Copy to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
2. District Account Officer Haripur
3. District Monitoring Officer E&SE Haripur
4. Sub Divisional Education Officer (F) Haripur, Khanpur, Ghazi
5. ASDEO Circle concerned.
6. Official Concerned.
7. Office File.

Samina Altaf
 (Samina Altaf)
 District Education Officer
 Haripur

To

The Director,
Elementary and Secondary Education,
KPK, Peshawar

Attested
a. Cassullan

Departmental Appeal against impugned transfer order dated 02/05/2020

Sir,

1. With due respect it is submitted that the appellant is serving as PHST in GGPS Shewaral and has been transferred from GGPS Shewaral to GGPS Darra vide impugned transfer order Endst. No. 13655-60 dated 02/05/2020. Copy of order is attached.
2. That the appellant is permanent resident of Shewaral whereas the place of present posting is hundred miles away from the place of abode of the appellant. It would hardly be possible for the appellant to approach GGPS Dara from her residence.
3. That there are vacant posts in union council. The competent authority without adhering to the rule in vogue illegally transfer appellant form GGS Shewaral to GGPS Dara.
4. That it is, further submitted that the impugned transfer order dated 02/05/2020 which has been received by the

Attested
Nazia Sultana  

appellant on 06/05/2020 is premature, against the rule on the subject and competent authority i.e. DEO Female Haripur has issued the same with malafide intention and to accommodate blue eyed having political backing. Law favours decision on merits without fear and favour. Therefore, impugned transfer order to the extent of appellant is liable to be set-aside.

5. That it is worth mentioning that appellant being female employee is serving in the education department since 2000 to till date and in this period of service, the appellant was posted once in a school which was near to the place of her residence only for a period w.e.f 22/09/2018 to 02/05/2020, hence, the appellant belongs to a helpless family having no political backing and influence to get her due right of service.

In view of the above it is prayed that impugned transfer order dated 02/05/2020 to the extent of the appellant may graciously be set-aside, so as to enable her to serve the department with a peace of mind.

Yours obediently

Dated _____/2020

Nazia Sultana
Nazia Sultana
PHST GGPS Shewaral

To

Attested
Nasrullah

District Education Officer (Female)
Haripur

Subject; APPLICATION.

It is stated that the applicant is working as PHST in GGPS Shewaral and has been transferred from GGPS Shewaral to GGPS Darra vide impugned transfer order Endst. No. 13655-60 dated 02/05/2020.

That the applicant has filed departmental appeal against the said order before the worthy Director Elementary & Secondary Education, KPK Peshawar which is still pending.

It is therefore, very humbly requested that the applicant may not be enforced to relieve the charge of her post from GGPS Sherwal to GGPS Darra.

Dated _____/2020

Nazia Sultana
Nazia Sultana
PHST GGPS Shewaral



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR

Asst. Dir. E&SE
Khyber Pakhtunkhwa
Peshawar
(13)

No. 5509 / A No 342 / Appeal Haripur
Dated Peshawar the 18/6/2020

To

The District Education Officer,
(Female) Haripur

Subject:- APPLICATION

I am directed to refer to the subject cited above and to enclose herewith a copy of an application in respect of Mst. Nazia Sultana PST GGPS Sherower District Haripur for further necessary action as per rules/policy.

Endst No. _____

Copy of the above is forwarded to the:

1. PA to Director E&SE KPK Peshawar.

o/c
Assistant Director (Female)
E&SE Khyber Pakhtunkhwa.
16/6/20

o/c
Assistant Director (Female)
E&SE Khyber Pakhtunkhwa.
16/6/20



OFFICE OF THE DISTRICT EDUCATION OFFICER (F) PRIMARY HARIPUR.

14

Attested
Nasrullah Chaudhary

APPOINTMENT.

As conveyed by the S.O. Primary Government of NWFP, Education department Peshawar. Vide No. SO (PE) 1-34/2000 dated 01.3.2000, the Governor NWFP, has been pleased to order the appointment of Mst. Nazia Sultana widow of Naik Muhammad Nawaz Shaheed (KARACHI SECTOR) as PTC teacher against any available vacancy on compassionate grounds in relaxation of the recruitment procedure/rules.

Therefore Mst; Nazia Sultana daughter of Hassan Bahader Village Sherawal P.O. Kundi Tehsil and District Haripur PTC trained is hereby appointed as PTC teacher at Government Girls Primary School Darra Sirrikote against vacant PTC post in BPS-7 (1480-87-2695) plus usual allowances as admissible under the rules in the interest of public service with effect from the date of her taking over charge.

TERMS AND CONDITIONS.

1. The appointment is made purely on temporary basis and can be terminated without assigning notice or reason.
2. She will produce her Health & Age Certificate from the Medical Superintendent concerned within 15 days, otherwise this order will be cancelled.
3. She will give fifteen days prior notice or forfeited pro. month pay in lieu of desired to leave the post.
4. Charge report should be sent to all concerned in duplicate.

Nasrullah Chaudhary
DISTRICT EDUCATION OFFICER,
(FEMALE) PRIMARY HARIPUR.

Encl: No. 143-12

Dated 29/3/2000.

1. The Director Primary Education NWFP Peshawar.
2. S.O. Primary Govt of NWFP, Education Department Peshawar vide his No. SO (PE) 1-34/2000 dated 1.3.2000.
3. The District Accounts Officer, Haripur.
4. The Sub Div:1: Education Officer, (Female) Haripur.
5. The Head Teacher GGPS Darra.
6. The Candidate concerned.
7. Office order file.

DISTRICT EDUCATION OFFICER,
(FEMALE) PRIMARY HARIPUR.

Attested
Kasruddin Khan

OFFICE OF THE EXECUTIVE DISTRICT OFFICER SCHOOLS AND LITERACY HARIPUR

(15)

ADJUSTMENT As approved by the competent authority,
Ms. Nazia Sultana PTC Govt: Girls Primary Darra (Ghaz) is here
subjected against payment PTC at Govt: Girls Primary School, Sherwal (Ghaz)
on her own pay and EPS in the interest of public service with immediate
effect.

NOTE:

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

(SYED BASHIR HOSSAIN SHAH)
EXECUTIVE DISTRICT OFFICER
SCHOOLS AND LITERACY HARIPUR.

Endst: No. 27352-57 / App: trf: PTC (F) dated. 06-12-2003

1. Copy to the : District Coordination Officer Haripur.
2. District Officer (Female) Schools and Literacy Haripur.
3. Dy: District Officer (Female) Schools and Literacy Haripur.
4. PS to Zila Nazim Haripur.
5. PS to Hon: Minister for Education NWFP Peshawar.
6. Head Teacher GCPS Darra & Sherwal.

[Handwritten Signature]

FOR/EXECUTIVE DISTRICT OFFICER
SCHOOLS AND LITERACY HARIPUR.



3

Office of the Executive District Officer

Elementary & Secondary Education Haripur

PE No. 0995-610178, 610179

Attested
Nasrullah Khan



Order

The following PST Female teachers are hereby deployed to the Schools mentioned against the name of each due to the non availability of posts in their own Schools and directed to leave the charge at once and report to the new stations without any delay, in the interest of public service.

S.No.	Name of Teacher with School	Deployed to	Remarks
1	Mehr-un-Nisa PST GGPS Sirikote	GGPS Rundi	Against Vacant Post
2	Shagufta Naz PST GGPS Sherawal	GGPS Koichra	Against Vacant Post
3	Nazia Sultana PST GGPS Sherawal	GG S Kalingar	Against Vacant Post

Executive District Officer
Elementary & Secondary Education
Haripur

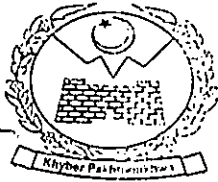
Dated 14/09/2010

Endst No: - 9615-22/

Copy of the above is forwarded for information and necessary action to the:-

1. Senior District Accounts Officer, Haripur.
2. DDO (Female) Elementary Education Haripur w/r to his No. 970 dated 09.09.2010.
3. DDO/ Cluster incharge concerned.
4. Officials concerned.

Executive District Officer
Elementary & Secondary Education
Haripur



Office of the Executive District Officer
Elementary & Secondary Education Haripur
PH No. 0995-610178, 610268

17

Order

Attested
Nasrullah Khan

Consequent upon the approval of the competent authority, The following adjustment / Mutual order of PST staff of E&SE Department Haripur is hereby ordered on their own pay & grade in the Schools mentioned against the name of each on administrative grounds, in the interest of public service with immediate effect.

S.No.	Name/ Designation/ Address	To	Remarks
1.	Mst. Saniya Khatoon PST, GGPS Panian No.1	GGPS Dendah	Vice S.No.2
2.	Mst. Durr-e-Shauar PST, GGPS Dendah	GGPS Panian No.1	Vice S.No.1
3.	Mst. Fatima Jabeen PST, GGPS Panian No.1	GGPS Dendah	Vice S.No.4
4.	Mst. Zainab Khatoon PST, GGPS Dendah	GGPS Panian No.1	Vice S.No.3
5.	Mst. Azhra Parveen PST, GGPS Chamiari	GGPS Kothera	Against Vacant Post
6.	Mst. Nazia Sultana PST, GGPS Kalinjar	GGPS Kundi	Against Vacant Post

Note:-

1. No TA/DA & TG is allowed to any one.
2. Charge reports should be submitted to all concerned.

-----sd/-----
Executive District Officer
Elementary & Secondary Education
Haripur

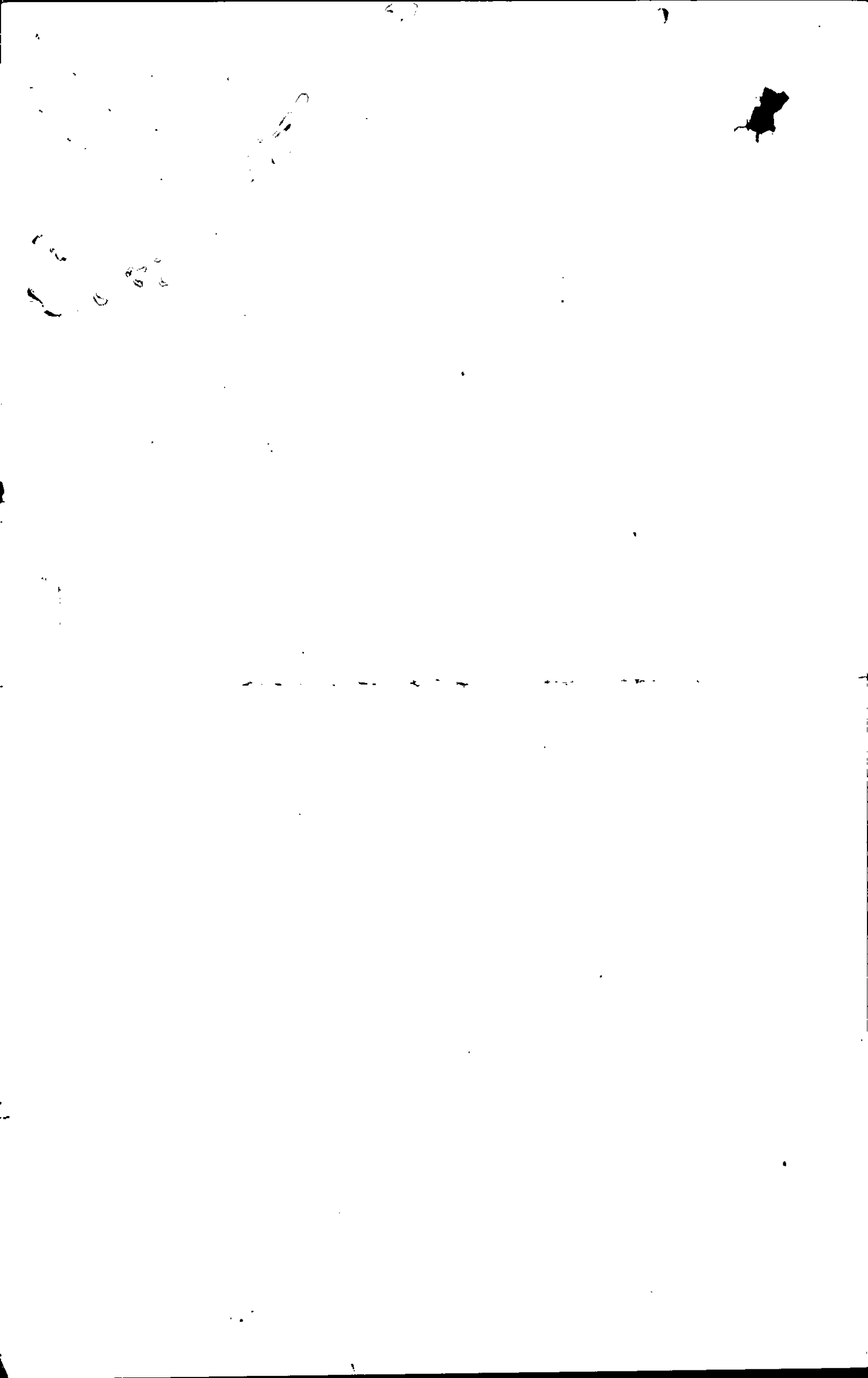
Endst: No. 17589-97

Dated: 11/12/2010.

Cc:

1. The Senior District Accounts Officer Haripur.
2. The Deputy District Officer Female Elementary Education Haripur.
3. The DDO's/ Cluster Incharge concerned.
4. Office Copy.

District Officer (Male)
Elementary & Secondary Education
Haripur





Office of the Deputy District Officer (F)
Elementary & Secondary Education Haripur

Attached
Nasrullah Chaudhary

MUTUAL

As approved by the Competent Authority, the following PST (Female) E & SE departments are hereby ordered on their own pay and grade in the interest of public service with immediate effect.

S.No	NAME & ADDRESS	FROM	TO	REMARKS
1	Nazia Sultana PST	GGPS Kundi	GGPS Sherawal	On Mutual ground vice S.NO. 02
2	Bib Akhtar PST	GGPS Sherawal	GGPS Kundi	Vice S. No 1

Note, - Charge report should be submitted to all concerned.

Sd/-

Executive District Officer
Elementary & Secondary Education
Haripur

Ends : No. 389-91

Dated Haripur the 28/2/2011.

Cop: for information and necessary action to the: -

1. District Accounts Officer Haripur.
2. Head Teachers concerned.
3. Office record.

Deputy District Officer (F)
Elementary & Secondary Education
Haripur



6

OFFICE OF THE SUB-DIVISIONAL EDUCATION OFFICER (FEMALE)
Haripur

(A)
Attested
Asrarullah

OFFICE ORDER

In pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.SO(B&A)/1-18/E&SE/2012 dated 11-07-2012 & this office Notification No. 5729-34 dated 13-11-2014, the following Primary School Head Teacher (Female) PSHT-B-15 are hereby adjusted to the newly upgraded posts of Primary School Head Teachers (Female) SPHT B-15 (8500-700-29500) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below as mentioned against their names with immediate effect.

S.No	S.List No.	NAME OF TEACHER	F/Name	Name of School	D/O Birth	Place of Posting	Remark
1	601	ROBINA GUL	ROSHAN DIN	GGPS MANG	01/01/1975	GGPS RAJ DHANI	Against Vacant Post
2	603	MUSSARAT BEGUM	ABDUL MANAN	GGPS CHANAR KOT	01/02/1975	GGPS CHANAR KOT	Against Vacant Post
3	604	FEROZA JABEEN	R.FEROZ ZAMAN	GGPS JAB	16/02/1975	GGPS JAB	Against Vacant Post
4	605	SHAZIA JABEEN	M.ASHRIF	GGPS JAM	31/03/1975	GGPS KARIPLIAN	Against Vacant Post
5	606	GULNAZ	HASSAN GUL	GGPS MAGRI	10/04/1975	GGPS HIL BEER	Against Vacant Post
6	610	FOZIA NOREEN	M.IBRAR	GGPS LABAN BANDI 2	05/05/1976	GGPS CHITRI	Against Vacant Post
7	614	NOSHABA KAUSAR	M.DORAN	GGPS GHULAMABAD	19/07/1977	GGPS DHALRI	Against Vacant Post
8	616	BUSHRA PARVEEN	HADER ZAMAN	GGPS P.KAMAL KHAN	05/10/1977	GGPS RAMRI	Against Vacant Post
9	629	HAMEELA BIBI	HUKAMDAD	GGPS Kohala Bala	01/05/1974	GGPS DARKOT	Against Vacant Post
10	630	SHAMA SHAHEEN	YAQOOB ELAHI	GGPS SURAJ GALLI	10/08/1976	GGPS KHANPUR NO. 1	Against Vacant Post
11	637	ZAKIA BIBI	M.ASHRAF	GGPS SWAR MAIRA	30/11/1969	GGPS SWABI MAIRA	Against Vacant Post
12	642	SHAMSHAD	KHAWAJ MOHAMMAD	GGPS PHARALLAH	25/03/1974	GGPS MOHALLA DANDHA	Against Vacant Post
13	647	SHAZIA SAEED	SAEED ALJTAR	GGPS BHERRAY	23/09/1974	GGPS MAARI (KHANPUR)	Against Vacant Post
14	648	SHAMSHAD BEGUM	DOUD AKBAR	GGPS PIPLALA	28/10/1974	GGPS GHARI MAIRA	Against Vacant Post
15	651	UZMA AMBER	ABDUL QUAIM	GGPS RAILWAY STATION	04/12/1973	GGPS SATHANA	Against Vacant Post
16	652	SHAISTA QAISER	BASHIR MOHD	GGPS GHAZI HAMLET	15/03/1973	GGPS SOKRA	Against Vacant Post
17	653	NAZIMA SHAHEEN	BANARIS KHAN	GGPS PANIAN NO.2	01/11/1977	GGPS NARA AMAZAI	Against Vacant Post
18	654	SAMINA BIBI	M.AYUB	GGPS BANDI MIAN PIR DAD	06/03/1976	GGPS NALKI	Against Vacant Post
19	659	KHALIDA BIBI	HAZRAT SHAH	KTS NO.2 SCHOOL.2	15/04/1971	GGPS SHINGRI AMAZAI	Against Vacant Post
20	660	SHAHEEN BIBI	GHULAM SARWAR	GGPS PANDAK	02/09/1972	GGPS SANGRA	Against Vacant Post
21	662	SHAKIRA BIBI	GHULAM SARWAR	GGPS DOYLAN KHUSHKI	25/05/1974	GGPS DOYLAN KHUSHKI	Against Vacant Post
22	663	TAHIRA JABEEN	NOOR ELAHI	GGPS MOHRI MALYA	04/01/1976	GGPS KANEER	Against Vacant Post
23	664	Anjum Ara	Sultan Muhammad	GGPS Bhera	25/07/1976	GGPS PANI ROW LAQAB	Against Vacant Post
24	665	Shazia Bibi	AHMED DIN	GGPS Islampur.	11/11/1976	GGPS DEGRA AMAZAI	Against Vacant Post
25	666	SHAZIA DAUD	M.DAUD	GGPS Ain Pur	07/03/1978	GGPS AINPUR	Against Vacant Post
26	667	KHALIDA BIBI	HAZRAT SHAH	GGPS DEHDAN	14/04/1978	GGPS ZAIRAT BELA	Against Vacant Post
27	670	NARGIS BIBI	M.ASLAM	GGPS DARA GHARBI	08/03/1974	GGPS HALLI	Against Vacant Post
28	672	ZAINAB	FAZAL-UR-REHMAN	GGPS LOWER GALAI	04/02/1977	GGPS CHAMAIRI	Against Vacant Post
29	673	SHAZIA NOREEN	BASHIR AHMED	GGPS TEER	20/10/1977	GGPS KHARI	Against Vacant Post
30	674	ZUBAIDA KHATOON	ALI MUHAMMAD	GGPS SARAI SALEH NO.2	08/04/1974	GGPS GHUWANAN No. 1	Against Vacant Post
31	676	SHAKILA NOREEN	LAL AFSAR	GGPS AWAN MOHRA	08/05/1979	GGPS LATIFABAD	Against Vacant Post
32	687	WHEEDA BEGUM	ROOH KHAN	GGPS CHINAR KOT	02/04/1976	GGPS DARA GHAZI	Against Vacant Post
33	693	NAZMA SHAHEEN	ABDUL MAJID	GGPS KANI KOT	29/07/1978	GGPS THARCHITY	Against Vacant Post
34	694-A	SAMIA GUL	SHAMSUL ISLAM	GGPS AKHOON BANDI	04/04/1973	GGPS GALI AMAZAI	Against Vacant Post
35	694	PARVEEN GUL	GHULAM SARWAR	GGPS D.D.SHAHEED	01/03/1974	GGPS BAGLA	Against Vacant Post

18

List No.	NAME OF TEACHER	F/Name	Name of School	D/O Birth	Place of Posting	Remark
36	695-A SHAKILA BIBI	M. SHAFI	GGPS SARAI SALEH NO.2	11/06/1975	GGPS KHARIAN	Against Vacant Post
37	695 IRSHAD BIBI	MEHBOOB UR REHMAN	GGPS ALLOOLI	01/11/1980	GGPS CHAPRI MAIRA	Against Vacant Post
38	698 MUDASAR BIBI	S. SHAH MOHAMMAD	GGPS QUTBA DHAK	06/01/1973	GGPS JALEES	Against Vacant Post
39	700 Sajida Bibi	Bashir Ahmed	GGPS Islampur	25/11/1973	GGPS BAIT GALI	Against Vacant Post
40	701 BIBI SALMA	M. WARIS	GGPS GANDAF	23/04/1974	GGPS SWAR MAIRA	Against Vacant Post
41	707 SAJIDA BIBI	HAYAT GUL	GGPS GORAKI	08/05/1976	GGPS BAHKI	Against Vacant Post
42	712 MEHJABEEN	M. ILYAS	GGPS RAILWAY STATION	01/07/1979	GGPS GORAKI	Against Vacant Post
43	716 SAKINA PARVEEN	KHAN MOHAMMAD	GGPS BAGHPUR DHERI	12/10/1971	GGPS BAGHPUR DHARI	Against Vacant Post
44	717 AZWANA SHAHEEN	HAJI AHMED DIN	GGPS JEMRA	21/02/1973	GGPS CHECHIAN RACKAR	Against Vacant Post
45	718 RUBINA SHAHEEN	MAHROOF BULTAN	GGPS TALOKER	04/01/1974	GGPS ZAHIDA AMAZAI	Against Vacant Post
46	720 NAZIA BIBI	Faqar Zaman	GGPS CHOI	23/02/1975	GGPS JANDI	Against Vacant Post
47	721 NASREEN AKHTAR	ALLAH DETA	GGPS NEELAN	03/05/1975	GGPS NEELAN	Against Vacant Post
48	725 SHAHIDA BIBI	M. MATI-UR-REHMAN	GGPS GALHAM	20/04/1977	GGPS BATANGI	Against Vacant Post
49	726 GUL FARAZ BIBI	FUQAR ZAMAN	GGPS CHOOI	31/01/1978	GGPS KOMAL BALA	Against Vacant Post
50	728 RUKHTAJ BEGUM	ABDUL KHALIL	GGPS KOTEHRA	20/04/1979	GGPS KOTEHRA	Against Vacant Post
51	729 NAZIA PARVEEN	RAFUZ ZAMAN	GGPS BARKOT	12/12/1972	GGPS BARKOT	Against Vacant Post
52	730 PAHRAJ	MUSTAKEEM	GGPS DHUNIAN	25/12/1973	GGPS MALHAT	Against Vacant Post
53	731 FARZANA BIBI	ABDUL MAJID	GGPS JAM	19/03/1977	GGPS SAJJPUR	Against Vacant Post
54	733 SHENAZ BEGUM	GUL MAST	GGPS KUNDI	01/03/1978	GGPS KUNDI	Against Vacant Post
55	736 YASMEEN	MOHAMMAD DIN	GGPS KOHALA PAYEEN	04/12/1972	GGPS SANJIALA	Against Vacant Post
56	737 SAJIDA PARVEEN	Fazal Rehman	BHERRY	05/09/1973	GGPS PAK SHAHI	Against Vacant Post
57	739 BIBI SAEEDA	LAL HUSSAIN SHAH	GGPS BANDI MUNEEEN	15/02/1975	GGPS BANTH	Against Vacant Post
58	740 Rehana Yasmin	MOHAMMAD SULAIMAN	GGPS BODHAR	01/03/1977	GGPS BODHAR	Against Vacant Post
59	745 RABIA BIBI	M. KALEEM	GGPS JABRI	23/04/1979	GGPS NULLAH	Against Vacant Post
60	746 SHAHEEN AKHTAR	AYUB SHAH	GGPS Gudwalian 1	09/10/1979	GGPS BALANDA	Against Vacant Post
61	747 ZUBAIDA KHATOON	MUHAMMAD HAMAYOUN	GGPS NAJUFPUR	24/11/1979	GGPS BABOOTRI	Against Vacant Post
62	749 GUL BIBI	KALOO KHAN	GGPS DOYLAN KHUSHKI	01/01/1971	GGPS BANDI LABYAL	Against Vacant Post
63	750 NASIM AKHTAR	JAHANDAD	GGPS JATTI PIND	04/04/1971	GGPS KALINJAR No. 1	Against Vacant Post
64	756 GUL REHANA	SHAHZADA KHAN	GGPS KOT N.B NO.2	02/02/1976	GGPS ROMAIL	Against Vacant Post
65	758 HUMAIRA KOUSAR	KHAN AFSAR	GGPS MIRPUR	05/09/1977	GGPS GHARI SHAH MUHAMMAD	Against Vacant Post
66	759 NAZIA TABASUM	MALIK RUSTAM	GGPS PIND JAMAL KHAN	01/05/1978	GGPS HASSAN BAI	Against Vacant Post
67	762 Rooh Afza	Abdur Razaq	GGPS TALHAD	15/04/1978	GGPS HAL JUDAL	Against Vacant Post
68	765 SHAZIA NAWAZ	MUHAMMAD NAWAZ	GGPS PIND GHAKRA	05/03/1974	GGPS PIND GHAKRA	Against Vacant Post
69	769 Naheed Tabasum	M Ishaq	GGPS Gudwalian.1	01/04/1975	GGPS BELA AMAZAI	Against Vacant Post
70	770 SHAGUFTA NAZ	MALIK ALI	GGPS KOTEHRA	29/04/1976	GGPS MOHAT SECTER NO. 2	Against Vacant Post
71	778 RIFAT BIBI	UMER ZAMAN	GGPS KHOLIAN BALA	01/04/1976	GGPS CHAINTRI	Against Vacant Post
72	795 NAZIA SULTANA	HASSAN BAHADAR	GGPS SHERAWAL	12/10/1977	GGPS GAWARI	Against Vacant Post
73	798 TASLEEM AKHTER	M. YOUNIS	GGPS SALAM KHUND	10/10/1972	GGPS AL-DARA GHAZI	Against Vacant Post
74	800 IFFAT NAWAZ	MUHAMMAD NAWAZ	GGPS DARA GHARBI	09/09/1977	GGPS DANA FEROPUR	Against Vacant Post
75	801 SAEEDA BANO	FAZAL HAQ	KANGRA COLONY.1	10/10/1977	GGPS KEE KOT	Against Vacant Post
76	802 TAHIRA BIBI	ALTAF UL LAHD	GGPS TEER	02/01/1978	GGPS KANGER AMAGH	Against Vacant Post
77	804 SAIRA BANO	WAZIR MOHAMMAD	GGPS BESAG	10/01/1978	GGPS BESAG	Against Vacant Post
78	805 NAZLI BANO	ABDUL ISLAM	DOYIAN ABI	25/03/1972	GGPS NAJABPUR GALI	Against Vacant Post

ATTN: *(Handwritten signature)*

S. List No.	NAME OF TEACHER	F/Name	Name of School	D/O Birth	Place of Posting	Remark
817	AYSHA SADIQUE	M.SADEEQ	SOKA BRANCH	12/03/1972	GGPS PIT BANDI	Against Vacant Post
80 830	TEHMINA BIBI	M.YOUSAF	GGPS BAYLAN AHMAD ALI KHAN	20/07/1977	GGPS MAARI	Against Vacant Post
81 831	SHAZIA BIBI	TAJ MUHAMMAD	GGPS DHODA	15/09/1977	GGPS DHODA	Against Vacant Post
82 833	FAROOQ BIBI	M.IQBAL	GGPS GORAKI MAIRA	12/06/1978	GGPS BADHORA	Against Vacant Post
83 839	SURYIA JABEEN	S.AHMED SHAH	KTS SECT.4	19/09/1965	GGPS FAROSSA	Against Vacant Post
84 844-A	NADEEMA NOREEN	R.ABDUR RAHEEM	GGPS JOULIAN	14/04/1974	GGPS HARYALA	Against Vacant Post
85 846	SHAZIA BIBI	SHER BAHADER	PIND JAMAL KHAN	08/03/1982	GGPS PHUMBA	Against Vacant Post
86 850	FATIMA BIBI	ABDUL LATIF	GGPS DAVI	15/07/1976	GGPS DAVI	Against Vacant Post
87 851	ZAINAB BIBI	SYED KARIM	GGPS CHARWAI	01/01/1979	GGPS CHARWAI	Against Vacant Post

Terms and conditions:-

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

.....Sd/.....

District Education Officer (Female)
Haripur

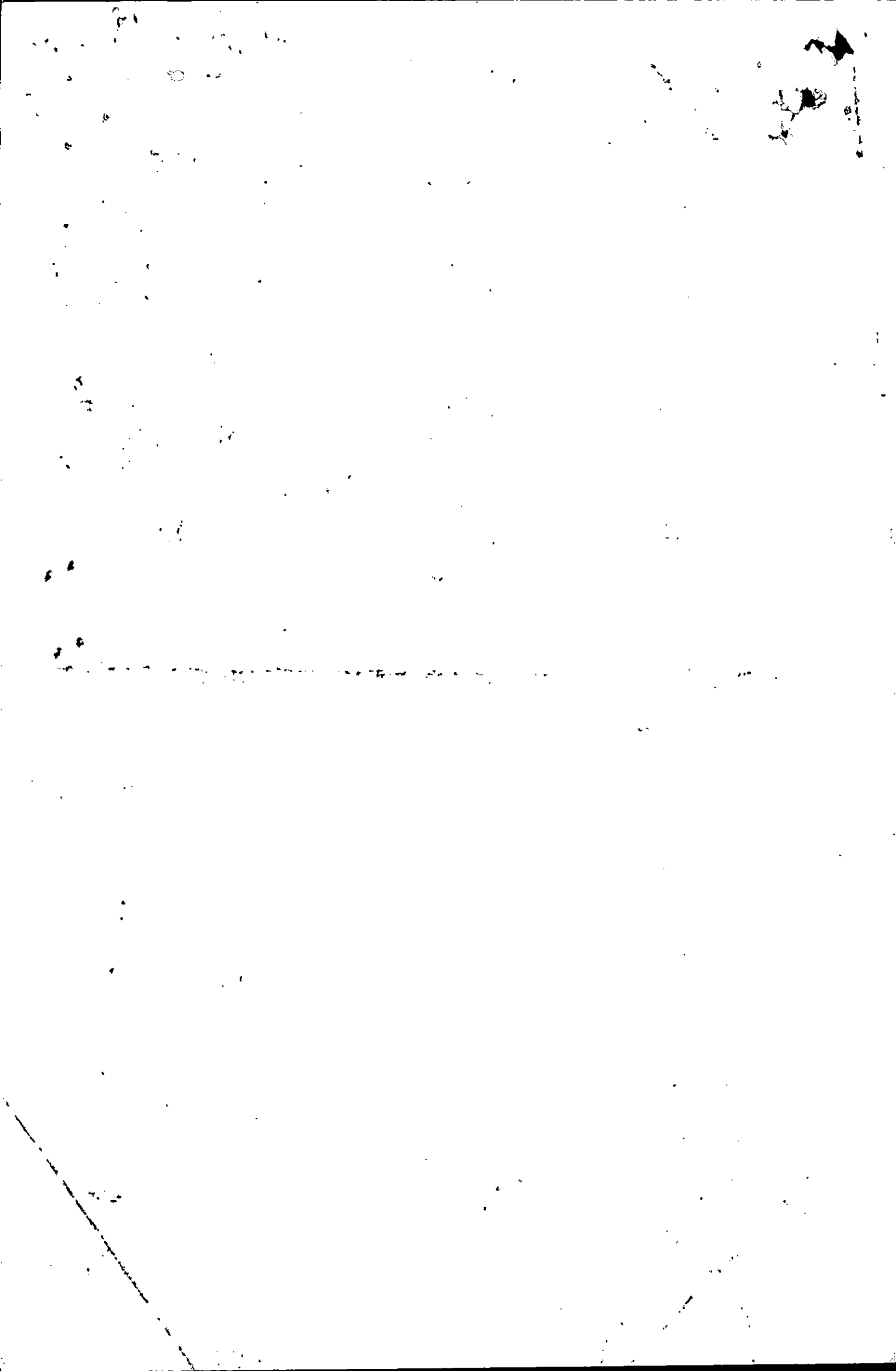
Endst: No. 781-90

Dated: 04/12 /2011

Copy of above is forwarded to:

1. The District Education Officer (F) Haripur
2. The Senior District Accounts Officer Haripur
3. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
4. All the ASDEO's Circle Concerned.
5. All the Teachers concerned.
6. Office Record File.

(Handwritten signature)
Sub Divisional Education Officer (Female)
Haripur



(21)
Affected
Mushtaq Hussain

20	Mustabshra Rani PSHT	GGPS Padni	GGPS Pind Gujan	Against Vacant Post
21	Shamata Hashmi PSHT	GGPS Uper Dholni	GGPS Shah Maqsood	Against Vacant Post
22	Nazima Shaheen PST	GGCMS Gherian	GGPS Padhana	Against Vacant Post
23	Zahida Bibi PST	GGPS Dobandi	GGPS Central Jail	Against Vacant Post
24	Rubina Yaqoob, PST	GGPS Akhon Bandi	GGPS Makhan Colony	Against Vacant Post
25	Sobia Bibi PST	GGPS Kheri	GGPS Jam	On Mutual Ground Versus No. 26
26	Saira Bano PST	GGPS Jam	GGPS Kheri	On Mutual Ground Versus No. 25
27	Gul Parveen SPST	GGPS Koklian	GGPS Sarai Gadhai	Against Vacant Post
28	Riffat Mumtaz PST	GGPS Padhana	GGPS Qarian	Against Vacant Post
29	Shamim Akhtar PST	GGPS Mohra Muhamdo	GGPS Makhan Colony	On Mutual Ground s Versus S.No. 30
30	Saira Ilyas PST	GGPS Makhan Colony	GGPS Mohra Muhamdo	On Mutual Ground s Versus S.No. 29
31	Zaheeda Bibi SPST	GGPS Degra	GGPS Telhala	Against Vacant Post
32	Shazia Khatoon PSHT	GGPS Noor Pur	GGPS Paswal	Against Vacant Post
33	Nazia Suhana PSHT	GGPS Mohra Khalifa	GGPS Sherwal	Against Vacant Post

Note:-

1. No T.A / D.A is allowed
2. Charge report should be submitted to all concerned.

(Jaffar Mansoor Abbasi)
 District Education Officer (F)
 Haripur

Dated: 22-09-2018

Endst No. 12303-40 /

Copy to the :-

1. Deputy Commissioner Haripur
2. District Account Officer Haripur.
3. District Monitoring Officer E&SE Haripur.
4. Sub Divisional Education Officers (Female), Tehsil Haripur, Tehsil Ghazi and Tehsil Khanpur.
5. ASDEOs Circle concerned.
6. Officials Concerned.
Office File.

(Jaffar Mansoor Abbasi)
 District Education Officer (F)
 Haripur



7

(22)

Office of the District Education Officer (Female)
HARIPUR

Signature of Nazirullah

Adjustment Order

Mst. Nazia Sultana PSHT (B-15) GGPS Gawari (Surplus) Haripur is hereby adjusted against vacant post at newly established School GGPS Mohra Khalifa Tehsil Ghazi District Haripur for functionalizing of the school, on her own pay & grade with immediate effect in the best interest of public service.

Note:

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

-----Sd/-----
District Education Officer (Female)
Haripur

Dated: 4 / 4 / 2015

Endst: No. 2466-69-1
Cc:

1. The District Accounts Officer Haripur.
2. The SDEO (F) Haripur.
3. The ASDEO (F) Circle Haripur.
4. The PSHT School concerned.
5. Office record file.

Signature of District Education Officer (Female)
District Education Officer (Female)
Haripur

الف اعلان | Alif Ailaan



Acknowledgement Certificate

Awarded to

Mr/Miss/Mrs NAZIA SULTANA HPST of GGPS MOHR AKHALI

**For his outstanding contribution in Enrollment
Campaign (گھرا یا استاد) 2015 by E & S.E Department Haripur & Alif Ailaan**

Mr. Zafar Arbab Abbasi
DEO Male Haripur

Naheed Anjam
DEO Female Haripur

Zahid Kazmi
NC Alif Ailaan

24
Attested
Nasrullah Khan

Miss Nazia Sultana Bibi PHST GGPS Sherawal Tehsil & District Haripur
(Appellant)

Versus

Govt: of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education
Peshawar & Others.....
(Respondents)

SERVICE APPEAL

JOINT PARAWISE COMMENTS ON BEHALF OF RESPONDENTS

Respectfully Sheweth:

Para wise reply/comments for and on behalf of respondent No.1-3 are as under.

Preliminary Objections:

1. That the appellant has got no cause of action to file the instant appeal.
2. That the appellant has not come to this Honorable Court with clean hands.
3. That the appellant has got no locus standi to file the instant appeal.
4. That the appellant has concealed the material facts from this Honorable Court, hence the appeal in hand is liable to be dismissed.
5. That the appellant has filed the instant appeal on malafide motives.
6. The appellant has filed the instant appeal just to pressurize the respondents.
7. That the appellant is estopped by his own conduct to file the present appeal.

Reply/Comments on facts are as under:

1. That Para No. 1 is correct to the extent of her transfer to GGPS Darra from GGPS Sherawa.
2. That Para No. 2 is incorrect. Miss Wasia Begum PSHT (widow) submitted application that being widow she may be adjusted in home union council :Her application was accepted and she is adjusted vide transfer order no 13655-60 dated 02-05-2020. Appellant was also adjusted in her own union council and near her home station within 4 KM.(copy of application is attached as annexure A)
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5. Para 6 is incorrect she is also adjusted her home station and home UC within 4 km. The department also facilitated the Wasia Begum PSHT being widow lady.
6. Para 6 is subject to rules and time duration.
7. That the appellant is not entitled for the relief seeking through instant appeal inter alia on the following and some other grounds.

GROUNDS:

3

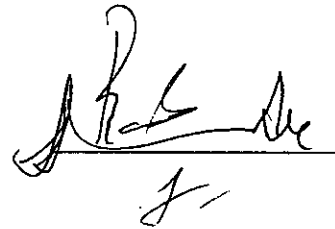
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- d. Incorrect Petitioners did not come with clean hands. Hence her appeal is liable to be dismissed.
- e. That the answering respondent also seeks the kind permission of this Honorable court to agitate further facts and grounds at the time of arguments in the instant appeal.

PRAYER

In view of the above made humble submissions, it is most respectfully prayed that on acceptance of foregoing factual position/ Comments, the instant appeal may very graciously be dismissed being meritless, please.

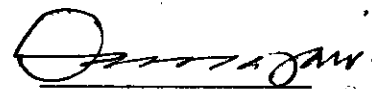
Respondent No 1

Secretary E&SE Departmen
Khyber Pakhtunkhwa Peshawar



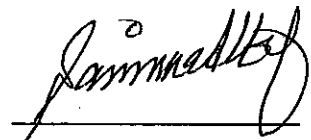
Respondent No 2

Director E&SE Department
Khyber Pakhtunkhwa Peshawar

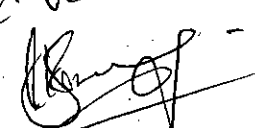


Respondent No 3

District Education Officer (F)
(Haripur)

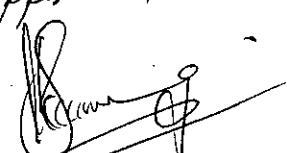


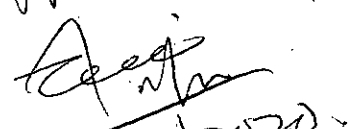
DDA II
PC. vet


11/11/20

Vetted, subject w
conviction, a meares
affidavit and
approval by D.A.

Approved.


11/11/20


11/11/2020
D.A.

08 April 2020 (4)

Secretary Higher Education Department
Govt of Khyber Pakhtunkhwa

Information: District Education Officer (Female), Haripur

Mst Wasia Begum W/O Sepoy Abdul Zakan (Shaheed)
Village: Shera Wal, Post Office: Kundi,
Tehsil & District: Haripur
Contact: 0302-5869970

Subject: Application by Mst Wasia Begum widow of No 3087781 Sepoy Abdul Zakan (Shaheed)

No 3087781 Sepoy Abdul Zakan ex 87 Medium Regiment embraced Shahadat on 04 August 2004 due to road accident at Ramzan Gun Position Kashmir BDA. Mst Wasia Begum, widow of above named Shaheed soldier is presently serving as teacher in Govt Girls Primary School Garhi Mera, Teh. Ghazi. The applicant has requested through attached application for posting to one of the following places:-

- Govt Girls Primary School Shera Wal.
- Govt Girls Primary School Kundi.
- Govt Girls Primary School Umar Khan.

Photocopy of application and relevant documents are also attached with this letter. The applicant is resident of District Haripur (Contact no: 0302-5869970).

Foregoing in view, you are requested that the above named applicant may please be entertained according to her request and be adjusted as a welfare measure for Shaheed's family.

Docu ID: P3HIJA APPROVED BY AAG Lt Col Muhammad Farooq Ahmed on 08 Apr 2020

Note: Computer Generated Documents Do Not Require Signature.

RESTD

258
27/4

12/5

27/4

28/04

BEFORE THE HONABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal no 9410-2020

Miss Nazia Sultana Bibi PHST GGPS Sherawal Tehsil & District Haripur (Appellant)

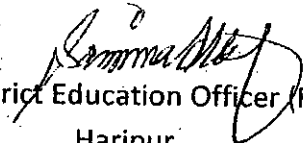
Versus

Govt: of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Peshawar
& Others..... (Respondents)

INDEX

Sr.No	Description	Page Nos	Annexure
1	Accompanying Comments & Affidavit.		
	Copy of application		A

(Respondent)


District Education Officer (F)
Haripur

BEFORE THE HONABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal no 9410-2020

Miss Nazia Sultana Bibi PHST GGPS Sherawal Tehsil & District Haripur
(Appellant)

Versus

Govt: of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education
Peshawar & Others.....
(Respondents)

SERVICE APPEAL

JOINT PARAWISE COMMENTS ON BEHALF OF RESPONDENTS

Respectfully Sheweth:

Para wise reply/comments for and on behalf of respondent No.1-3are as under.

Preliminary Objections:

1. That the appellant has got no cause of action to file the instant appeal.
2. That the appellant has not come to this Honorable Court with clean hands.
3. That the appellant has got no locus standi to file the instant appeal.
4. That the appellant has concealed the material facts from this Honorable Court, hence the appeal in hand is liable to be dismissed.
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GROUNDS:

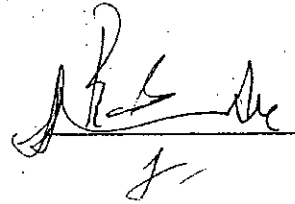
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PRAYER

In view of the above made humble submissions, it is most respectfully prayed that on acceptance of foregoing factual position/ Comments, the instant appeal may very graciously be dismissed being meritless, please.

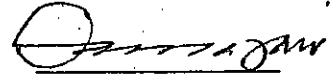
Respondent No 1

Secretary E&SE Departmen
Khyber Pakhtunkhwa Peshawar



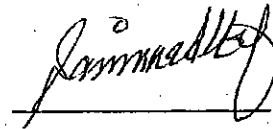
Respondent No 2

Director E&SE Department
Khyber Pakhtunkhwa Peshawar

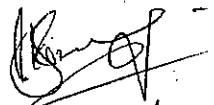


Respondent No 3

District Education Officer (F)
(Haripur)

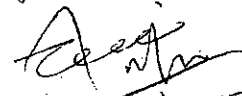


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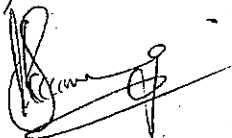
Vetted, subject to
connection, annexes
affidavit and
approval by D.A.



11/11/2020

D.A.

Approved.



11/11/20

08 April 2020

Secretary Higher Education Department
Govt of Khyber Pakhtunkhwa

Information: District Education Officer (Female), Haripur
Mst Wasia Begum W/O Sepoy Abdul Zakan (Shaheed)
Village: Shera Wal, Post Office: Kundi,
Tehsil & District: Haripur
Contact: 0302-5869970

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Photocopy of application and relevant documents are also attached with this letter. The applicant is resident of District Haripur (Contact no: 0302-5869970).

Foregoing in view, you are requested that the above named applicant may also be entertained according to her request and be adjusted as a welfare measure for Shaheed's family.

Docu ID: P3HIJA APPROVED BY AAG Lt Col Muhammad Farooq Ahmed on 08 Apr 2020
Note: Computer Generated Documents Do Not Require Signature.

RESTD

258
27/4

12/3

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20/04



Office of the District Education Officer Female (Haripur)

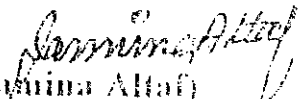
PHONE NO 0995-920154

Order

As proposed by the SDEO Ghazi the following Teachers are hereby adjusted in different schools on the reasons mentioned against their names on their own pay and grade/scale in the best interest of public service with immediate effect.

S NO	Name of Teachers/Designation	From	To	Remarks
1	Wasia Begum PSHT	GGPS Garhi Maira	GGPS Sherawal	Being widow of Shaheed soldier.
2	Nazia Sultana PSHT	GGPS Sherawal	GGPS Darra Ghazi	On Vacant Post/Need bases
3	Raheela Naz SPST	GGPS Kotehra	GGPS Garhi Maira	On Vacant Post/Need bases

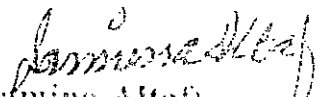
1. No T.A /D.A is allowed
2. Charge report should be submitted to all concerned.


(Samina Altaf)
District Education Officer (F)
Haripur

13655-60
Endst: No. _____ Dated 02 10 2020

Copy to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Account Officer Haripur.
3. District Monitoring Officer E&SE Haripur.
4. Sub Divisional Education Officer (F) Haripur, Khanpur, Ghazi
5. ASDEO Circle concerned.
6. Official Concerned.
7. Office File.


(Samina Altaf)
District Education Officer (F)
Haripur

Office of the Sub Division

GHAZI, H. H.

No. 769 Dated 12.05.2020

To

Nazia Sultana PSHT
GGPS Dara Ghazi

Subject:- RELIEVING FROM GGPS SHERAWAL
Memo:-

You are hereby reliev^ed from GGPS Sharawal against Fud No PWS/500 Dated
02.05.2020.

You are directed to take over charge and submit your charge report to the
undersigned within 03 days positively. If you are fail to submit your charge report disciplinary
action will be taken against you under E&SE Rule-2011.

Sub Divisional Education
Officer (D) Ghazi

[Handwritten signature]



Office of the Sub Division

GHAZI, HARIPUR

No. 781

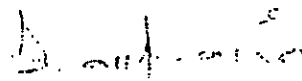
Dated 01/06/2020

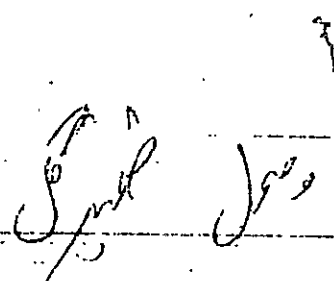
To

Nazia Sultana PSHT
GGPS Dara Ghazi.

Subject:- **WARNING**
Memo:-

Reference to the transfer order vide DEO (I) Haripur issued under Endst:No.13655-60 dated 02-05-2020, you are transfer from GGPS Sherawal to GGPS Dara Ghazi. You are not taking over charge after received of transfer order. The undersigned has directed you ~~to~~ take over charge within 3 days otherwise disciplinary action will be taken against you & pay will be stopped.


Sub-Divisional Education
Officer (I) Ghazi





OFFICE OF THE SUB-DIVISIONAL OFFICER

H A Z I R A

No. R.71 Dated 1/11/2020


To

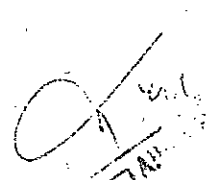
The Manager,
Allied Bank Limited Ghazi

Subject:- STOPPAGE OF PAY UNDER ACCOUNT NO. PLS 3973-6

R/Sir,

It is stated that the pay of Mst. Nazia Sultana PMII
under Account No. 3973-6 of GGPS Sherawal Ghazi
be stopped till further order please.


Sub-Divisional Education
Officer (Female) Ghazi


15/11/2020
17/11/2020

E

Registered

Office of the Sub Divisional Education Officer
GHAZI HARIPUR

No. 805 Dated 30/06/2020


To

Nazia Sultana PSHT
GGPS Dara Ghazi.

Subject:- EXPLANATION
Memo:-

Reference the letter No.769 dated 12-05-2020 and warning letter No.781 dated 01-06-2020.

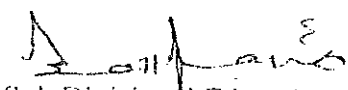
You have neither received registered office letter nor taking over charge in GGPS Dara Ghazi according to the transfer order vide DEO (F) Haripur issued under Endst:No.13655-60 dated 02-05-2020,. Therefore you are hereby directed to explain your position that why not disciplinary action initiate against you under E&D rule 2011. Your written reply should be reached to the office of undersigned within 3 days positively.


Sub Divisional Education
Officer (F) Ghazi

Endst.No. 806 /

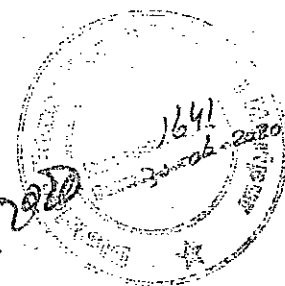
Dated 30/6/2020

Copy to the District Education officer (Female) for information please.


Sub Divisional Education
Officer (F) Ghazi

Abol (P)

9
4/7/2020



Office of the
GHAZI, HARIPUR

No. 826

Dated: 08/08/2020

To
The District Education Officer
(Female) Haripur

SUBJECT:- REPORT OF PERSONAL HEARING IN R/O MST, NAZIA SULTANA PSHI
Memo:-

Reference the letter No.1753 dated 27-07-2020

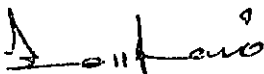
The undersigned directed to Mst. Nazia Sultana PSHI to attend the office of DIO
(Female) Haripur for personal hearing.

She attended the office of the District Education Office (F) Haripur on 12:00am dated
08-08-2020 alongwith her brother.

During the proceeding of personal hearing with the District Education Officer
(Female) teacher concerned used abusive language / misbehaves and did not receive questionnaire
Under the prevailing Rules of civil servant she involved in misconduct.

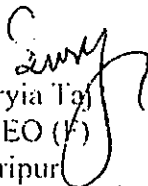
You are therefore, requested that necessary action may kindly be taken against the
teacher concerned under E&SE Rule KPK-2011.

Witness



Saeeda Bano
SDEO (F)
Ghazi

Witness



Suryia Taj
SDEO (F)
Haripur

Witness



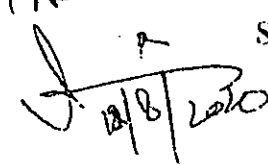
Shaguffa Abbasi
ADO (Estab: Sec:)
Haripur


Witness



Asma Ghafar
Superintendent
Haripur



Ado(P)

12/8/2020


Sub Divisional Education Officer (F)
Ghazi
SDEO(F)
Ghazi

