

S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
	10.02.2016	<p align="center"><u>KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,</u> <u>PESHAWAR.</u></p> <p align="center">Service Appeal No. 409/2014</p> <p>Mst. Farah Shabir Versus Secretary, Education (E&SE) Government of Khyber Pakhtunkhwa Peshawar and others.</p> <p align="center"><u>JUDGMENT</u></p> <p><u>PIR BAKHSH SHAH, MEMBER:</u> - Counsel for the appellant (Mr. Muhammad Asif Yousafzai, Advocate) and Government Pleader (Mr. Muhammad Jan) with Mr. Khurshid Khan, SO and Mr. Inayat Ullah, ADO for officials and counsel for private respondent No. 4 (Mr. Gohar Ali, Advovate) present.</p> <p>2. Vide impugned order dated 19.11.2013 the appellant was transferred from GGMS Zakhi Qabristan to GGMS Nawan Killi District Nowshera and private respondent No. 4 was transferred and posted in her place. Feeling aggrieved the appellant filed departmental appeal which was not responded, hence the present appeal under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974.</p> <p>3. Arguments of the learned counsel for the appellant, learned Government Pleader for the official respondents and counsel for private respondent No. 4 have been heard and record perused.</p>

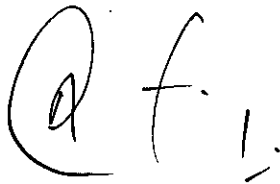
4. It is the contention of the learned for the appellant that husband of private respondent No. 4 is not a civil servant, therefore, the spouse policy was not applicable in case of private respondent No. 4 which policy has been misapplied. It was further submitted that husband of the appellant is a civil servant and by way of the impugned order she has been transferred to a school which is at sufficient distance from her home which aspect of the case was not taken into account at the time of the impugned order. It was further submitted that appellant has been discriminated for the reason that civil servants with long tenure were not transferred in order to accommodate private respondent No. 4 and thus the appellant was made a scapegoat and thus treated discriminatory. Lastly, it was submitted that the impugned order was politically motivated.

5. Learned counsel for private respondent No. 4 argued that after the impugned order the appellant was re-adjusted at GGMS Babe Qadeem vide order dated 06.11.2014 (copy of which has been produced before the court to-day) which order has not been challenged by the appellant before the appellate authority or before this Tribunal and the impugned order has been superseded by subsequent order dated 06.11.2014 hence the appeal has become infructuous and not maintainable.


6. The learned Government Pleader also resisted the appeal by stating that the appellant had completed her tenure and that the impugned order was passed in public interest.

7. Since departmental appeal of the appellant has not been decided and the appellant yet feels dissatisfied, therefore, the Tribunal deems it proper to remit the case to the departmental appellate authority to decide departmental appeal of the appellant strictly in accordance with law and posting/transfer policy of the government within a period of two months from the receipt of this order. Order accordingly. The appeal is disposed of in the above terms. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
10.02.2016



(ABDUL LATIF)
MEMBER



(PIR BAKHSH SHAH)
MEMBER

02.10.2015

Clerk to counsel for the appellant and Addl: AG for respondents present. Arguments could not be heard due to general strike of the Bar. To come up for arguments on

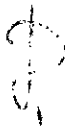
10-2-16



Member



Member



409/2014

3.4.2015

Counsel for the appellant (Mr. Muhammad Asif Yousafzai, Advocate), Mr. Muhammad Jan, GP for the official respondents and counsel for private respondent No. 4 (Mr. Gohar Ali, Advocate) present. Arguments partly heard.

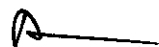
During the course of arguments, it was pointed out that the appellant has been subsequently transferred to GGMS Bab-e-Qadeem. It is the contention of the learned counsel for private respondent No. 4 and the learned Government Pleader that the instant appeal has become infructuous. Since that order is not available on the record, therefore, the official respondents are directed to produce the same on the next date. To come up for further arguments on 30.6.2015.



MEMBER


MEMBER

30.06.2015

Counsel for the appellant, Muhammad Jan, GP for official respondents and counsel for private respondent No.4 present. Copy of transfer order dated 01.11.2014 was submitted by learned counsel for private respondent No.4 which is placed on file, however learned counsel for the appellant submitted that though appellant has been transferred from GGMS Nawan Killi to GGMS Bab-e-Qadeem but department may be directed to produce the record as to whether the said transfer was made on request of appellant or by the department itself, hence the said record if any be also requisitioned. To come up for full arguments on 02.10.2015.


Member


Member

NWFP. Routine 5

No. _____ From _____

Date _____ To _____

Encl: _____

SUBJECT:

AT : 9-4-2010 (S. 23) ^{وزیر اعلیٰ}
(BPS-15) ^{وزیر تعلیم}

- Annex C - Dist: Nowshera :

- 1-0 = 19.11.2013 → Nowshera Ki. Qli.

- P-14
- P-16

① Same length of service.

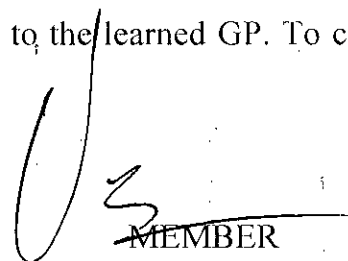
② Tenure.

③ Med. prob.

P-16

01.09.2014

Clerk to counsel for the appellant and Mr. Muhammad Jan, GP with Inayatullah Rahman, ADO for the respondents present. Rejoinder received. Copy handed over to the learned GP. To come up for arguments on 07.1.2014.


MEMBER

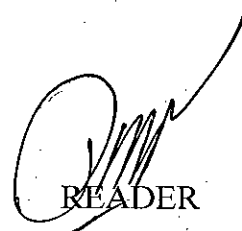
07.11.2014

Appellant with counsel and Mr. Muhammad Adeel Butt, AAG with Khursheed Khan, SO for the official respondents and private respondent No. 4 with counsel present. Due to incomplete Bench, case is adjourned to 5.1.2015 for arguments.



05.1.2015

Clerk to counsel for the appellant and Mr. Muhammad Adeel Butt, AAG with Muhammad Irfan, ADO for the official respondents and clerk to counsel for private respondent No.4 present. The Tribunal is incomplete. To come up for the same on 3.4.2015.


MEMBER
READER

3.4.2015

Counsel for the appellant (Mr. Muhammad Asif Yousafzai, Advocate), Mr. Muhammad Jan, GP for the official respondents and counsel for private respondent No. 4 (Mr. Gohar Ali, Advocate) present. Arguments partly heard.

During the course of arguments, it was pointed out that the appellant has been subsequently transferred to GGMS Bab-e-Qadeem. It is the contention of the learned counsel for private respondent No. 4 and the learned Government Pleader that the instant appeal has become infructuous. Since that order is not available on the record, therefore, the official respondents are directed to produce the same on the next date. To come up for further arguments on 30.6.2015.

MEMBER

MEMBER

19.5.2014

Appellant in person, and AAG with Khursheed Khan, SO and Amir Badshah, ADO for official respondents and Mr. Gohar Ali, Advocate/counsel for private respondent No. 4 present and Wakalatnama placed on file. Respondents need time. To come up for written reply on main appeal as well as reply/arguments on stay application on 16.6.2014.

MEMBER

MEMBER

13.6.2014

Counsel for the appellant and Mr. Muhammad Jan, GP with Javed Ahmad, Supdt. and Inayatullah, ADO for official respondents present and requested for time. Private respondent No. 4 with counsel present and Wakalatnama placed on file. He also submitted written reply on main appeal as well as stay application. Copies handed over to counsel for the appellant. To come up for written reply of official respondents on main appeal as well as reply/arguments on stay application on 15.07.2014

MEMBER

15.07.2014

Counsel for the appellant, Mr. Muhammad Jan, GP with Khursheed Khan, SO and Inayatullah, ADO for official respondents and counsel for private respondent No. 4 present. Written reply of the official respondents received and copy handed over to counsel for the appellant. To come up for arguments on 01.9.2014. Rejoinder, if any, in the meantime.

MEMBER

MEMBER

Appeal No. 409/2014
Mst. Farah Shafiq

14.04.2014

Counsel for the appellant present and requested for adjournment. To come up for preliminary hearing on 28.04.2014.

Member

28.04.2014

Clerk of counsel for the appellant present and requested for adjournment. Request accepted. To come up for preliminary hearing on 08.05.2014.

Member

08.05.2014

Counsel for the appellant present. Preliminary arguments heard and case file perused. Counsel for the appellant contended that the appellant has not been treated in accordance with law/rules. Against the impugned order dated 19.11.2013, she filed departmental appeal on 11.12.2013, which has not been responded within the statutory period of 90 days, hence the present appeal on 14.03.2014. Points raised at the Bar need consideration. The appeal is admitted to regular hearing subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, Notices be issued to the respondents. Appellant has also filed an application for suspending the operation of order dated 19.11.2013. Notice of application should also be issued to the respondents for reply/arguments. To come up for written reply/comments on main appeal on 13.06.2014 as well as reply/arguments on application on 19.05.2014.

Member

08.05.2014

This case be put before the Final Bench for further proceedings.

Chairman

3.

4.

5.



6.

Appellant deposited
process fee & security
Rs. 200/- Bank Receipt
attached with file

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 409/2014


S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	24/03/2014	<p>The appeal of Mst. Farah Shabir resubmitted today by Mr. M. Asif Yousafzai Advocate may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p>
2	24-3-2014	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>14-4-2014</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mst. Farah Shabir AT GGMS Nawan Killi Nowshera received today i.e. on 14.03.2014 is incomplete on the following scores which is returned to the counsel for the appellants for completion and resubmission within 15 day.

- 1- Annexure-A of the appeal is illegible which may be replaced by legible/better one.
- 2- Annexures of the appeal may be attested.

No. 451 /S.T,

Dt. 17/03 /2014.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. M. Asif Yousafzai Adv. Pesh.

Resubmitted after compliance
M. Asif

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR.

APPEAL NO. 409 /2014

Mst: Frarah Shabeer AT

Vs

Education Deptt:

INDEX.

S.NO	DOCUMENTS	ANNEXURE	PAGE
1-	Memo of appeal.	---	1 - 3
2-	Stay application.	---	4 - 5
3-	Order dt.9.4.2010	A	6 - 7
4-	Arrival report.	B	8
5-	Husband's service certificate	C	9
6-	CM directives.	D	10
7-	Transfer order.	E	11
8-	Appeal.	F	12-13
9-	Hospital record.	G	14-15
10-	Spouse policy.	H	16
11-	List of other teachers.	I	17 - 21
12-	Transfer policy.	J	22 - 28
13-	Circular dt. 27.2.2013.	K	29
14-	Vakalat nama	---	30.

APPELLANT

THROUGH:


M.ASIF YOUSAFZAI
ADVOCATE.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

APPEAL NO. 409 /2014

Mst: Farah Shabir AT (BPS-15)

GGMS Nawan Killi Nowshera.

(Appellant)

VERSUS

1. The Secretary, Education, (E&SE)Government of Khyber Pakhtunkhwa Peshawar.
2. The Director Education (E&SE)Khyber Pakhtunkhwa Peshawar.
3. District Education Officer (Female) Nowshera.
4. Mst. Dur Sadaf AT , GGMS Zakhi Qabaristan Nowshera.

(Respondents)

APPEAL UNDER SEC- 4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE TRANSFER ORDER DATED 19.11.2013 AND NOT TAKING ANY ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN 90 DAYS.

PRAYER:

THAT THE ACCEPTANCE OF THIS APPEAL, THE IMPUGNED ORDER DATED 19.11.2013 MAY BE SET ASIDE BEING PASSED IN THE VIOLATION OF SPOUSE POLICY, POSTING/TRANSFER INSTRUCTION, POLITICALLY MOTIVATED AND PREMATURE. THE RESPONDENT DEPTT: MAY FURTHER PLEASE BE DIRECTED NOT TO TRANSFER THE APPELLANT PREMATURELY AND IN VIOLATION OF RULES AND LAW. ANY OTHER REMEDY, WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND PROPER MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.

Re-submitted to the
and filed,

24/3/14

R.SHEWETH:

1. That appellant was appointed on AT (BPS-15) Post by order dated 9.4.2010 upon the recommendation of Departmental Selection Committee and posted in GGMS Zakhi Qabristan where the appellant took over charge on dated 12.4.2013. (Copy of order and charge report is attached as Annexure – A & B).
2. The husband of the appellant is also Govt: Servant and is teaching in GPS Zakhi Qabristan. Copy of service certificate is attached as Annexure – C.
3. The appellant was working in GGMS Zakhi Qabristan with the entire satisfaction of his superior and no complaint has been filed against the appellant.
4. The C.M Secretariat KPK Peshawar, directed the DEO (Female) E&S Education Deptt: District Nowshera that respondents No.4 may be transferred and posted to any of the school nearest to he home as per spouse policy. The DEO (Female) Nowshera, on that direction of the C.M secretariat, transferred the appellant from GGMS Zakhi Qabristan to GGMS Nawan Killi. And posted the private respondent in her place vide order dated. 19.11.2013. Copies of directives and order are attached as Annexure – D&E.
4. The appellant filed departmental appeal on dated 11.12.2013 but no reply has been given to the appellant on this departmental appeal within 90 days.(copy of the departmental appeal is attached as Annexure – F)
5. The appellant having no other remedy is constrained to come to this august Tribunal on the following grounds.

GROUND:

- A – That the impugned order dated 9.10.2013 is against the law, rules and norms of justice, premature, politically motivated, violation of Govt: circulars, therefore not tenable.
- B – That the appellant have 5 kids including a milk suckling baby (born on 17.8.2013) and it is difficult for the appellant to manage them . Because the appellant has to change five buss/ datsun stops for

arriving at GGMS nawan killi Nowshera. Copy of last baby birth certificate is attached as Annexure – G.

- C – That the impugned order has been passed in violation of spouse policy, which is not tenable in law. Because the husband of the private respondent is not a Govt: servant to avail the facility of spouse policy. Copy of policy is attached as Annexure - H
- D – That the impugned order is not based on public interest but on political whims as evident from the Annexure – D with the appeal. Thus the order is totally politically motivated.
- E – The transfer of the appellant is in total violation of Govt: posting transfer policy and circular based on the Anita Turab case dated. 27.2.2013, Thus the order impugned is liable to be set-aside on this score alone. Copies of policy and circular is attached as Annexure – I & J.
- F – That the impugned transfer order is also premature as the appellant has not completed her tenure at GGMs Zakhi Qabaristan Nowshera.
- G- That the appellant has been discriminated because many other AT teachers with longer tenure have been left while the appellant has been made escape goat. Copy of list is attached as Annexure – K.
- G – That the appellant seeks permission to advance other ground and proofs at the time of hearing.

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

APPELLANT

Farah
FARAH SHABIR

THOUGH:

M. Asif Yousafzai
(M.ASIF YOUSAFZAI)

ADVOCATE PESHAWAR

&
Taimur Ali Khan
(TAIMUR ALI KHAN)

ADVOCATE PESHAWAR

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

APPEAL NO. _____/2014

Mst: Frarah Shabeer AT

Vs

Education Deptt:

**APPLICATION FOR SUSPENDING THE OPERATION
OF ORDER DATED. 19.11.2013 TILL THE DISPOSAL
OF MAIN APPEAL.**

R.SHEWETH.

1. That the appellant has filed an appeal along with this application in which no date is fixed so far.
2. That the impugned transfer order is passed due to political interference and in violation of posting transfer policy, spouse policy.
3. That the appellant has a milk suckling baby and has also been discriminated.
4. That the grounds of main appeal may also be considered as integral part of this application.
5. That the appellant has a good prima facie case and all the three ingredients are in favour of appellant.

It is therefore most humbly prayed that the operation of the order dated. 19.11.2013 may be suspended till the decision of main appeal.

Jarah

APPELLANT

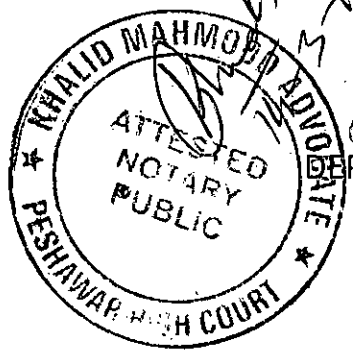
THROUGH:

M. Asif Yousafzai

M.ASIF YOUSAFZAI
ADVOCATE.

AFFIDAVIT.

It is affirm that the contents of this application are true and correct.



Jarah

DEPONENT.



EXECUTIVE DISTRICT OFFICER
ELEMENTARY & SECONDARY EDUCATION
NOWSHERA

Dated Nowshera the Friday, April 09, 2010

Belle copy A

NOTIFICATION

Consequent upon the approval of the competent authority and recommendations of Departmental Selection Committee (DSC), the undersigned is pleased to appoint the following candidates as AT (Male and Female) and TT (Male and Female) in the BPS-15 and BPS-14 respectively plus usual allowances as admissible under the rules on regular basis (but without pension and gratuity) in the schools noted against each in the interest of public service with immediate effect.

A.T (Male)

S.No	Name / Qualification / Address	Father's Name	Score	Name of School
1	Sajjad Ali MA/Alamia, Zuani Khel NSR Kalan	Abdul Khaliq	68.69	GHS Mohib Banda
2	Abdul Mujeeb MA/Alamia, Kheshqi Balan	Muhammad Siraj	64.30	GMS Palosi Payan
3	Bahadur Hayat MA/Alamia, Misri Banda Nowshera	Fazal Hayat	62.87	GHS Khaisari
4	Gul Naras Khan MA (Arabic & Islamiat), Zara Miana Nowshera	Hukam Din	58.91	GHSS Nizam Pur
5	Hazrat Shah MA/Alamia Kheshqi Bala	Ahmad Khan	58.01	GMS Khush Muqam
6	Hanif Ali MA (Arabic & Islamiat), Aza Khel Bala	Shemsher Khan	57.40	GHSS Jabba Khashk
7	Zaid Ullah Shah MA/Alamia, Marhati Banda Nowshera	Nadir Shah	57.20	GHS Mali Khel Bala

A.T (Female)

S.No	Name / Qualification / Address	Father's Name	Score	Name of School
1	Nasrin MA/Alamia, Kaji Khel Ziarat Kaka Sahib	Bahar Ud Din	63.75	GGMS Gul Dehri
2	Naaila Naz MA/Alamia, Akbar Pura	Malik Taj Muhammad	62.68	GGHS Kolji Kalan
3	Tasnim ul Kabir MA/Alamia, Aza Khel Bala	Abdul Kabir	58.04	GGMS Kana Khel
4	Saira Ibrar BA/Alamia, Akbar Pura	Sayed Ibrar Shah	56.39	GGMS Aman Kot
5	Robcena Bi Bi BA/Alamia, Akbar Pura	Abdur Raheem	53.59	GGMS Habib Ullah Koroonia Jehangera
6	Saima Bukhari MA/Alamia, Akbar Pura	Mian Bukhari Shah	53.33	GGMS Chowki Mamraiz
7	Madeeha Younas MA Arabic, Dagi Qadeem NSR	Muhammad Younas	52.62	GGMS Dagi Qadeem
8	Hilisa Begum MA Arabic, Dag Ismail Khel	Mian Iftikhar Hussain	51.29	GGHS Pabbi
9	Secma Kifayat BA/Alamia, Akbar Pura	Kifayat Ullah	49.44	GGMS Gul Din Koroonia
10	Zaib Un Nisa BA/Alamia, ASC Colony NSR Cantt.	Ghulam Rahim	49.40	GGHS Dehri Kaji Khel
11	Nusrat Sher FA/Alamia, Zando Banda Nowshera	Muhammad Sher	48.84	GGMS Pir Sabar
12	Rozeena FA/Alamia, Pir Piai Nowshera	Iraq Shah	45.10	GGMS Pir Piai
13	Bi Bi Shazia MA Arabic, Aza Khel Bala	Azeem Khan	44.64	GGMS Shiekhi
14	Salma Noreen FA/Alamia, Akbar Pura	Rokhan Shah	43.85	GGHS Dag Behrud
15	Mah Gul BA/Alamia, Adam Gee Aman Garh	Anar Ud Din	43.53	GGHS Nowshera Cantt
16	Dil Naz Bibi FA/Alamia, Shereen Koti Rashaki	Tilla Muhammad	43.25	GGHSS Rashakai
17	Dil Naz Begum FA/Alamia, Aza Khel Payan	Shamsul Wahab	42.75	GGHS Aza Khel Payan
18	Sayeda Noreen Ihsan FA/Alamia, Baba Khel Ziarat Kaka Sahib	Sayed Ihsanul Wahab	42.57	GGHS Badrashi
19	Aneela Gul FA/Alamia, Ali Shah Tarkha Nowshera	Sayed Sulaid Shah	42.46	GGMS Jabba Tar
20	Ishrat Fatima FA/Alamia, Tarkha Nowshera	Habib Ur Rehman	41.28	GGMS Misri Banda
21	Shehnaz Sabir BA/Alamia, Akbar Pura	Muhammad Sabir Shah	40.45	GGHS Mohib Banda
22	Zeena Wara FA/Alamia, Akbar Pura	Raidi Gul	40.09	GGHSS Shaidu
23	Farah Shabeer FA/Alamia, Zakhi Qabristan Akbar Pura	Muhammad Shabeer	36.22	GGMS Zakhi Qabristan
24	Talat Yasmin SSC/Alamia, Kahi Nowshera	Ahmad Shah	34.98	GGMS Kahi
25	Faihat SSC/Alamia, Paper Mills Aman Garh	Noor Ul Hassan	33.99	GGMS Ashoor Abad
26	Saeeda Bano SSC/Alamia, Akbar Pura	Fojoon Khan	33.43	GGHS Spin Khak
27	Gul Dusta SSC/Alamia, Aza Khel Payan	Muhammad Ghulam	33.36	GGMS Cheshmai
28	Meena Hassan SSC/Alamia, Aza Khel Bala	Noor Ul Hassan	33.03	GGMS Pashtoon Garhi
29	Shaista Kiran SSC/Alamia, Shaidu Nowshera	Tilawat Khan	32.69	GGHS Inzari
30	Salma Gul SSC/Alamia, Ziarat Kaka Sahib	Usman Ullah	32.65	GGMS Spin Kani Khurd
31	Rozina SSC/Alamia, Aza Khel Bala	Gul Azim Khan	31.33	GGMS Islam Abad
32	Dur e Sadaf SSC/Alamia, Zakhi Qabristan Akbar Pura	Irfan Ud Din	31.01	GGMS Nawar Killi
33	Naeema Gul SSC/Alamia, Aza Khel Payan	Ameen Shah	30.89	GGMS Zara Miana
34	Shabana Farid Gul SSC/Alamia, Akbar Pura	Farid Gul	29.70	GGMS Adam Zai
35	Tahira SSC/Alamia, Akbar Pura	Raidi Gul	29.57	GGMS Risalpur
36	Nagina SSC/Alamia, Ali Garh Akora Khallak	Mumtaz Hussain	29.23	GGMS Baghban Pura
37	Fatima Begum SSC/Alamia, Kahi Nowshera	Riaz Afzal Khan	29.06	GGHS Nizam Pur

Friday, April 09, 2010

1 of 3

EDO E&SE Nowshera

38	Alia Naema SSC/Alamia, Baloo Taru Jabba	Imad Ud Din	28.87	GGMS Palosai
39	Ghanna Sadiq SSC/Alamia, Akbar Pura	Shabir Ahmad Siddiqi	28.63	GGMS Shah Kot
40	Sayra Begum SSC/Alamia, Aza Khel Bala	Noor Hussain	28.57	GGMS Meta Khel
41	Naveeda SSC/Alamia, Aza Khel Bala	Gul Azim Khan	27.97	GGMS Makeen Abad
42	Rena SSC/Alamia, Aza Khel Baia	Gul Azam Khan	26.46	GGMS Khawrai

TT (Male)

S.No	Name	Father's Name	Score	Name of School
1	Sher Zada MA/TT Sanad, Khashgi Payan	Gul Zada	66.16	GMS Khashgi Payan
2	Maqbool Alam BA/TT Sanad, Kahi Nizampur	Ahmad Shah	60.57	GHSS Nizampur
3	Sheran Ali Shah MA/TT Sanad, Misri Banda	Mehran Shah	60.12	GHS Mali Khel Bala
4	Irfan Ali BA/TT Sanad, New Khato Khel Nowshera Kalan	Farzand Ali	58.33	GHS Aman Garhi
5	Abdul Hameed MA/TT Sanad, Feroz Sons AIL Colony Aman Garh	Abdul Haleem	57.78	GMS Spin Kani Kalan
6	Muhammad Hidayat Ullah MA/TT Sanad, Isori Payan Akora	Muhammad Saeed Jan	57.31	GMS Cheshmai
7	Muhammad Khan MA/TT Sanad, Gandetiri Risalpur	Mustaman Khan	57.13	GHS Gandehri Payan
8	Fazal Mahmood BA/TT Sanad, Mian Essa Jahangira	Fazal Mabood	57.04	GMS Zando Banda
9	Muhammad Shahzad Ullah MA/TT Sanad, Adamzai Akora Khattak	Wilayat Hussain	56.99	GMS Garu
10	Arshad Khan BA/TT Sanad, Issori Bala Akora Khattak	Sanobar Khan	55.13	GHS No.2 Pir Piai
11	Muhammad Zahir BA/TT Sanad, Khashgi Payan Nowshera	Noshad Khan	54.86	GMS Harza Rashakai
12	Faiz Ul Islam MA/TT Sanad, Dagi Jadeed Pabbi	Saif Ul Islam	54.75	GHS Wazir Garhi
13	Muhammad Asif FA/TT Sanad, Ali Baig Taru Jabba	Muhammad Israil	53.46	GHS Banda Sheikh Ismail
14	Hidayat Ullah BA/TT Sanad, Khura Abad Rashaki	Malang Jan	53.42	GMS Bakhti
15	Asif Kamal BA/TT Sanad, Risalpur Cantt.	Abduli Rasheed	52.90	GMS Palosi Payan
16	Abd Ullah Shah BA/TT Sanad, Shaidu Nowshera	Ghulam Zakria	52.76	GHS Maroba
17	Naseer Ahmad FA/TT Sanad, Misri Banda NSR	Noor Muhammad	52.55	GHS Samandar Garhi
18	Faheem Hussain BA/TT Sanad, Ayub Abad Akora Khattak	Sardar Hussain	52.25	GMS Sadiq Abad
19	Waqar Ahmad BA/TT Sanad, Luqman Abad Jehangira	Raham Shed	52.15	GMS Hisar Tang
20	Ihtisham Ul Hag BA/TT Sanad, Eid Gah Akora Khattak	Abdul Shakoor	51.36	GMS Sadu Khel
21	Sayed Muqbil Ali Shah BA/TT Sanad, Akora Khattak	Sayed Oaim Ali Shah	51.26	GHSS Manki Sharif
22	Pervaiz Ahmad MA/TT Sanad, Marhali Banda Nowshera	Raees Khan	50.80	GMS Aziz Abad
23	Shah Islam FA/TT Sanad, Tarkha Nowshera	Muhammad Islam	50.62	GHSS Akbar Pura

TT (Female)

S.No	Name	Father's Name	Score	Name of School
1	Nazia Munair MA/TT Sanad, Dagi Qadeem	Muhammad Raziq	62.40	GGMS Dagi Qadeem
2	Zill I Humay Begum BA/TT Sanad, Pashtoon Garhi NSR	Sharif Hussain Khan	55.17	GGMS Chowki Mamraiz
3	Gumaira Sheah BA/TT Sanad, Badrashi NSR	Muhammad Shoab	51.80	GGMS Adamzai
4	Nidal Ara FA/TT Sanad, Kahi Nowshera	Sayed Wali Shah	50.26	GGMS Kahi
5	Shabeena Amin BA/TT Sanad, Nowshera	Muhammad Amin	50.10	GGHS Nowshera Cantt
6	Faryal Shah FA/TT Sanad, Kakizai Akora Khattak	Iaiq Shah	44.26	GGMS Cheshmai
7	Sunaira Ibad FA/TT Sanad, Ali Garh Akora Khattak	Ibad Gul	41.69	GGMS Khawrai
8	Salma FA/TT Sanad, Aza Khel Bala	Muhammad Ali Shah	41.54	GGHS Dehri Kati Khel
9	Bushra SSC/TT Sanad, Dag Behsud Nowshera	Gulab Khan	41.02	GGHS Dag Behsud
10	Asia Islam FA/TT Sanad, Khashgi Bala	Muhammad Islam	40.96	GGMS Meta Khel
11	Shabina Akhtar SSC/TT Sanad, Dag Behsud	Azcom Khan	36.36	GGMS Shah Kot
12	Humaira Naz SSC/TT Sanad, Taru Jabba	Fatih Khan	35.55	GGMS Balu
13	Neelam SSC/TT Sanad, Khashgi Payan	Taj Muhammad	35.35	GGMS Kutar Pan
14	Faiza SSC/TT Sanad, Aza Khel Payan	Muhammad Ghulam	34.53	GGMS Shiekh
15	Nazia SSC/TT Sanad, Badrashi Nowshera	Sharif Gul	34.44	GGMS Kana Khel
16	Humira Bi Bi SSC/TT Sanad, Kakizai Akora Khattak	Faizul Haq	30.68	GGMS Islam Abad
17	Nadia Begum SSC/TT Sanad, Aza Khel Bala	Mumtaz Ali	26.06	GGMS Aman Kot

TERMS & CONDITIONS

- The appointee will get initial scale including usual allowances as admissible under the rules. They are entitled for annual increment after completion of one year service; however they are not eligible for pension and gratuity as per current policy of the Govt. of NWFP.
- The District Officer E&S Education (M/F) concerned must obtain surety bond as well as agreement bond executed by each candidate to obey policy of the Govt. of NWFP Act-2005 and will have no right to challenge the policy in any court of law.
- Their Services will be considered as per current rules and regulation of the NWFP.
- Their services are liable to be terminated on one month's prior notice from either side. In case of resignation without prior notice one month pay and allowances, if any shall be forfeited in favors of Govt. through treasury challan.

5. Their Services will be on probation for two years and they will not be transferred to other station before completion of probation period.
6. Contribution of CP Fund will be made as per rules and regulations of Govt. of NWFP
7. The appointees should re-verify their names from the undersigned and join their posts within 15 days of the issuance of this order positively otherwise the appointment shall stand as cancelled.
8. Their services can be terminated at any time, in case their performance is found unsatisfactory and they will be removed from service under the rules framed from time to time.
9. They are directed to furnished copies of all sort of certificates/degrees/deen assnad etc. along with their original receipts and photo copies of all testimonial pertaining to the verification fee of concerned examination bodies (Board/University/wifaq/tanzeem etc.) to the District Officer E&SE (M/F) Nowshera. If any certificate/degree etc. of any candidate found fake in verification process, he/she will be removed from service under the existing rules.
10. The appointing authority shall arrange verification of all the certificates and degrees (academic and professional) etc. of the appointee and will issue clearance certificate of each appointee to the DAO for the release of his/her pay.
11. The Pay Source-1 should not be submitted to DAO Nowshera prior verification of the certificates/degrees from the concerned institutions.
12. The Principals/Head Masters/Head Mistress concerned should personally check their original certificates, degrees, domiciles and CNIC before handing over charge.
13. Overage candidates should not be handed over charge, appointed in Open Merit, Deceased children, Disabled and Earthquake quotas unless the age relaxation awarded to them. The age limit in respect of AT/TT is 18-33.
14. The disable candidates should produce fresh certificate from the Standing Medical Board (SMB) to the effect that their disability will not obstruct in their job.
15. Health and age certificate should be provided from the Medical Superintendent before taking over charge.
16. Charge report should be submitted to all concerned.
17. No TA/DA etc. shall be allowed to the appointees for joining their duties.

(Haji Hasanat Gul Khattak)
Executive District Officer
Elementary & Secondary Education
Nowshera

Endst. No.661-764/EDOE&SE NSR/AT/TT(M&F) /Etabt. branch Dated 09/04/2010.

Copy forwarded for information and necessary action to the:-

1. PS to Minister for E&S Education NWFP Peshawar.
2. PS to Secretary E&S Education NWFP Peshawar.,
3. Director, E&S Education NWFP Peshawar.
4. Section Officer (PE) Govt. of NWFP E&S Education Peshawar.
5. District Coordination Officer Nowshera.
6. Senior District Accounts Officer Nowshera.
7. Human Resource Development Officer DCO Office Nowshera.
8. Principals/Head Masters/Head Mistress concerned.
9. District Officer (M/F) E&S Education Nowshera.
10. Candidates Concerned.

Executive District Officer
Elementary & Secondary Education
Nowshera



ELEMENTARY EDUCATION
NOWSHERA

(A) (6)

Date: Nowshera the Friday, April 09, 2010

NOTICE

Consequent upon the approval of the competent authority and recommendations of Departmental Selection Committee (DSC), the undersigned is pleased to appoint the following candidates as AT (Male and Female) and TT (Male and Female) in the BPS-15 and BPS-14 respectively plus usual allowances as admissible under the rules on regular basis (but without pension and gratuity) in the schools noted against each in the interest of public service with immediate effect.

A.T (Male)

S.No	Name / Qualification / Address	Father's Name	Score	Name of School
1	Sajid Ali MA/Alama, Zaki Khel NSR Kalan	Sahar Khalq	68.69	GHS Muhib Banda
2	Abdul Khabib MA/Alama, Kheshgi Balan	Muhammad Siraj	64.30	GMS Palosi Payan
3	Behadar Hayat MA/Alama, Jilani Banda Nowshera	Behar Hayat	62.87	GHS Khairan
4	Gul Nuras Khan MA (Arabic & Islamiyat), Zaira Khel Nowshera	Muham Din	58.91	GHSS, Nizam Pur
5	Huzrat Saib MA/Alama Kheshgi Balan	Amran Khan	58.01	GMS Khush Muqam
6	Hani Ali MA (Arabic & Islamiyat), Aza Khel Balan	Khemulor Khan	57.40	GHSS Jabba Khush
7	Zaid Ullah Saib MA/Alama, Marhat Banda Nowshera	Madr Khan	57.20	GHS Mali Khel Balan

AT (Female)

S.No	Name / Qualification / Address	Father's Name	Score	Name of School
1	Nasrin MA/Alama, Zaki Khel Zaira, Kaka Sahib	Sahar Ud Din	63.75	GGMS Gul Dand
2	Amal Naz MA/Alama, Akbar Pur	Muhammad Muhammad	62.36	GGHS Kuli Kalan
3	Husnain Khatun MA/Alama, Aza Khel Balan	Amran Khan	58.04	GGMS Kano Khel
4	Saima Begum MA/Alama, Akbar Pur	Sajid Saib Khan	56.39	GGMS Anjan Kot
5	Rehema Bano MA/Alama, Akbar Pur	Muhammad Khan	54.59	GGMS Habib Ullah Korooni Changan
6	Saima Sultan MA/Alama, Akbar Pur	Muhammad Khan Shair	52.43	GGMS Nawaiz
7	Madeena Yasmin MA/Alama, Dagi Godeen NSR	Muhammad Younas	52.02	GGMS Dagi Godeen
8	Mitsa Begum MA/Alama, Dagi Ismail Khel	Muhammad Hussain	51.29	GGMS P...
9	Saeeda Khatun MA/Alama, Akbar Pur	Muhammad Ullah	49.44	GGMS Gul F. Korooni
10	Zahid Un Nisa MA/Alama, SSC Odony NSR Gant	Muhammad Khan	49.40	GGHS Dahi Kuli Khel
11	Nusrat Sher MA/Alama, Zahir Saib Nowshera	Muhammad Sher	48.84	GGMS Pir Saib
12	Rozeena MA/Alama, Pir Saib Nowshera	Muhammad Khan	48.00	GGMS Pir Saib
13	B. Bi Shazia MA/Alama, Aza Khel Balan	Muhammad Khan	44.34	GGMS Shakhri
14	Saima Noor MA/Alama, Akbar Pur	Rakham Khan	43.05	GGHS Dagi Godeen
15	Mah Gul MA/Alama, Adam Goo Aman Garh	Amar Ud Din	43.53	GGHS Nowshera Gant
16	Dil Naz Begum MA/Alama, Sironon Koh Rashahi	Muhammad Khan	42.75	GGHSS Rashahi
17	Dil Naz Begum MA/Alama, Aza Khel Payan	Muhammad Wahid	42.75	GGHS Aza Khel Payan
18	Sayeda Noor Bano MA/Alama, Bahi Khel Zaira Kaka Sahib	Muhammad Khan	42.57	GGHS Saorashi
19	Ancen Gul MA/Alama, Shah Tarbia Nowshera	Sayeda Gul Khan	40.47	GGHS Jabba Tar
20	Huzrat Fatima MA/Alama, Tarbia Nowshera	Muhammad Khan	41.71	GGMS Muhib Banda
21	Shehraz Saib MA/Alama, Akbar Pur	Muhammad Saib Khan	40.46	GGHS Muhib Banda
22	Zehra Vira MA/Alama, Akbar Pur	Muhammad Gul	40.00	GGHSS Sharda
23	Zahra Shabeer MA/Alama, Zaki Christian Akon	Muhammad Shabeer	36.72	GGMS Zaki Christian
24	Tahira Yasmin SSC/Alama, Kuli Nowshera	Muhammad Saib	34.76	GGMS Kuli
25	Fahima SSC/Alama, Papan Was Aman Garh	Muhammad Saib	33.81	GGMS Ashoori Abad
26	Merveen Begum SSC/Alama, Aza Khel	Muhammad Khan	33.43	GGHS Spin Khak
27	Co. Durr SSC/Alama, Aman Garh	Muhammad Ghulam	33.36	GGMS Oreshma
28	Migana Haroon SSC/Alama, Aza Khel Balan	Muhammad Khan	33.01	GGMS Pasmoon Gant
29	Shahida Khatun SSC/Alama, Sharda Christian	Muhammad Khan	32.00	GGHS Inzan
30	Saima Gul SSC/Alama, Zaira Kaka Sahib	Muhammad Saib	32.56	GGMS Spin Kuli Khel
31	Migana SSC/Alama, Aza Khel Balan	Muhammad Khan	31.33	GGMS Islam Abad
32	Dil-e-Saib SSC/Alama, Zaki Oshri Gant	Muhammad Khan	31.01	GGMS Nawan Kuli
33	Muhammad Gul SSC/Alama, Aza Khel Payan	Muhammad Saib	30.39	GGMS Zaira Mohn
34	Shabana Gul SSC/Alama, Akbar Pur	Muhammad Gul	29.70	GGMS Adam Zai
35	Fahima SSC/Alama, Akbar Pur	Muhammad Gul	29.57	GGMS Rishoor
36	Hajira SSC/Alama, Aman Garh, Aza Khel	Muhammad Hussain	29.23	GGMS Bagban Pur
37	Fahima Begum SSC/Alama, Aman Garh	Muhammad Khan	29.05	GGHS Nizami Pur

Muhammad Saib
15/1
MAGISTRATE
NOWSHERA

Friday, April 09, 2010

1 of 3

EDD P/NSP Nowshera

ATTESTED

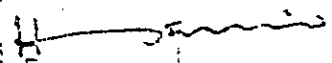
D

7

- 1. That candidates should be selected for two years and they will not be eligible for re-employment in CP Form 1 will be made as per rules and regulations of Government of Peshawar.
- 2. The names of candidates should be forwarded to the undersigned and they will be posted within 15 days of the issuance of this order positively otherwise the appointments will stand cancelled.
- 3. Their services can be terminated at any time in case their performance is not satisfactory and they will be removed from service under the rules in force.
- 4. They are directed to furnish copies of all sort of certificates (degrees, diplomas, etc.) along with their original receipts and photo copies of all institutions (Board, University, etc.) to the District Officer E&S (M/F) Nowshera. If any certificate (degree, diploma, etc.) is found fake in verification process, he/she will be removed from service under the existing rules.
- 5. The appointing authority shall arrange verification of all the certificates (degrees, diplomas, etc.) of the appointee and will issue clearance certificate of each appointee to the DAO for the release of his/her pay.
- 6. The Pay Source-1 should not be submitted to DAO Nowshera prior to the submission of certificates/degrees from the concerned institutions.
- 7. The Principals/Head Masters/Head Mistress concerned should personally check their original certificates, degrees, domiciles and CNIC before handing over charge.
- 8. Overage candidates should not be handed over charge, appointed in Open Merit Decisions under Disabled and Earthquake quota unless the age relaxation awarded to them. The age limit in respect of AT/TT is 18-33.
- 9. The disable candidates should produce fresh certificate from the Standards Medical Board (SMB) to the effect that their disability will not obstruct in their job.
- 10. Health and age certificate should be provided from the Medical Superintendent before taking over charge.
- 11. Charge reports should be submitted to all concerned.
- 12. No F.F.A etc. shall be allowed to the appointees for their previous duties.

(Haji Hasanat Gul Hattak)
 Executive District Officer
 Elementary & Secondary Education
 Nowshera

- Encls. No. 88/166/EDDO/ESSE & SR/AT/TT (M&F) (Resistant to Change Date: 10/04/2010)
- 1. Copy forwarded for information and necessary action to the:
 - 1. PS to Minister for E&S Education NWFP Peshawar
 - 2. PS to Secretary E&S Education NWFP Peshawar
 - 3. Director, E&S Education NWFP Peshawar
 - 4. Section Officer (M/F) Govt. of NWFP E&S Education Peshawar
 - 5. District Coordination Officer Nowshera
 - 6. Senior District Accounts Officer Nowshera
 - 7. Human Resource Development Officer DCO Office Nowshera
 - 8. Principals/Head Masters/Head Mistress concerned
 - 9. District Officer (M/F) E&S Education Nowshera
 - 10. Candidates Concerned.


 Executive District Officer
 Elementary & Secondary Education
 Nowshera

Friday, April 09, 2010

ATTESTED


(B) (8)

چارچ رپورٹ

رپورٹ ری جاتی ہے کہ مسماة فرح شہیر ولد محمد شہیر
کی تعزیری و تعیناتی بطور عربی ٹیچر [B.P.S: 15] جگہ ای ٹی او
صاحب [نوشہرہ]، جگہ نامہ نمبر 661-764، بتاریخ 04/04/2010
گو مدرسه ہذا [G.G.M.S ZAKHI QABRISTAN] میں ہو چکی ہے۔
مسماة فرح شہیر ولد محمد شہیر کو آج مورخہ 12/04/2016 کو
قبل از روئے مدرسه ہذا میں چارج حوالے کر دیا جاتا ہے۔

چارچ گریڈ

[Signature]

چارچ دہندہ

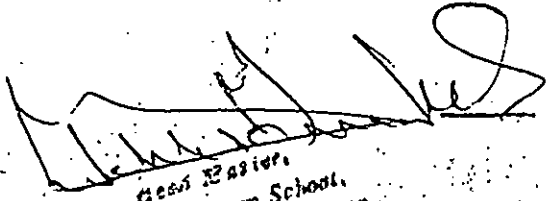
[Signature]
Head Mistress
Govt. Girls' Middle School
Zakhi Qabristan
District Nowshera.

ATTESTED
[Signature]

(C) (9)

SERVICE CERTIFICATE

It is certificate that Mr. Mukaram Khan S/O Umar Gul Village Zakhi Qabristan P/O Akkar pura Teh& Distt Nowshera has been Serving in Education department Nowshera. Since 28.5.1995.



Head Master,
Govt. Primary School,
Zakhi Qabristan, Nowshera

Attested
alahi

A.D.O. (Male)
Nowshera

ATTESTED



CHIEF MINISTER'S SECRETARIAT
KHYBER PAKHTUNKHWA
PESHAWAR

(D) / 10

No. SO-II/DMIS/KI-K/3-15/2013.
Dated: 09-10-2013.

/ 7022

The District Education Officer (Female),
Elementary & Secondary Education Department,
District Nowshera.

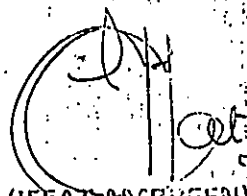
Subject: POSTING/TRANSFER

Memo:

I am directed to refer to the subject noted above and to enclose
herewith a copy of self-explanatory application of Ms. Far Sadiq GGMS, Nawan
Kallay, District Nowshera with the request that she may be transferred and
posted to any of the school nearest to her home as per spouse policy under
intimation to this Secretariat as desired by the competent authority please.

Yours Faithfully,

Encls: As Above


(IFFAT AMBREEN)
Section Officer-I

Encls: No and Date Even

Copy forwarded to the:-

PSO to the Chief Minister, Khyber Pakhtunkhwa.

*husband no?
Govt. Servant.*

Section Officer-I

ATTESTED





OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) NOWSHERA

E

11

TRANSFER/ADJUSTMENT ORDER.

In response of the Directives of Chief Minister Secretariat letter No.SO-1/CMS/KFK/S-15/2013/7022, Dated: 09/10/2013, the following transfer of AT are hereby ordered on their own pay and scale to the school noted against each in the best interest of Public with immediate effect.

S#.	Name with Desig	From	To
1.	Mst. Dur Sadaf AT B-15	GGMS Nawan Killi	GGMS Zakhi Qabraistan
2.	Mst. Farhat Shabir AT BPS-15	GGMS Zakhi Qabraistan	GGMS Nawan Killi

→ 40 KM away.

Note: - 1. No TA/DA is allowed.

2.. Charge should be submitted to all concerned.

(FARZANA JAVED)
DISTRICT EDUCATION OFFICER
(FEMALE) NOWSHERA.

Endst No. 7099-800/4 Endst: DO (F)/NSR Dated 10/11/2013

Copy forwarded for information and n/a to:-

1. Honourable Qurban Khan MPA-PK-16/(DDAC) Chairman Nowshera.
2. Section Officer -I Chief Minister Secretariat Khyber Pakhtun Khwa.
3. The Senior District Accounts Officer, Nowshera..
4. The Headmistress GGMS Nawan Killi /Zakhi Qabraistan.
5. The teachers concerned.
6. Office copy.

DISTRICT EDUCATION OFFICER
(FEMALE) NOWSHERA

5 km
(اکبر پورہ) قبرستان ← اکبر پورہ ← ناروہ ← خوشی 33 ←
نوشہرہ مکمل ← نواہ

ATTESTED

(F)

(12)

The Director Education (KPK)
Peshawar

Subject: Appeal against Transfer Order AT-BPS-15

Dear Sir,

I Mrs. Farah Shabir AT-BPS-15 working at G.G M School Zakhi Qabristan Nowshera under your kind supervision. I join the service on 12-04-2010 in this Dept. Now your good office has issued my transfer order from G G M School Zakhi Qabristan to G G M School Nowan Kali under Endst: 7099-8004 DO(F) NSR dated 19.11.2013 G G M School Nowan Kali is very far away from my residence and it is much difficult for me to perform my duties those my little childer (aged from 02 months to 08 years) will be effect by this order. My husband Mr. Mukaram Khan is alos working as Primary School teacher at the same station. According to the Govt Policy the couple shall be posted in the same station. But your good office is contrary to this policy.

Considering the above facts it is requested that the above mentioned order may please be cancelled and nail and void in the best public interest.

899
M/12

Jarah
Yours Obedient.

Dated: 20 November 2013

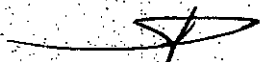
Mrs. Farah Shabir A.T
BPS-15
G G M School Zakhi Qabristan

11-12-13
8-3-14 (90 days)
5-4-14 (last dt)

ATTESTED

A

ATTESTED



سید محمد علی (15-805-804) درین باره

بھیجی

11/12

807

Jadh

19-11-2013 مور 7099-804-804
میں اس بارے میں اطلاع دینا چاہتا ہوں کہ

19-11-2013 مور 7099-804-804
میں اس بارے میں اطلاع دینا چاہتا ہوں کہ

میں اس بارے میں اطلاع دینا چاہتا ہوں کہ

19-11-2013 مور

7099-804-804

میں اس بارے میں اطلاع دینا چاہتا ہوں کہ

6

14

GOVT. MATERNITY HOSPITAL
BIRTH CERTIFICATE
Hastnagri, Peshawar.

Mother's Name: Farah W. Makhram Khan

D.A. 17 - 08 - 2013

Date of Birth 17 - 08 - 2013

Date of Discharge 17 - 08 - 2013

Mother's A/C Number 4417/222

Baby's A/D Number 2942/244

Sex Female

neuvic

Signature
Medical Officer

ATTESTED

A

Medicine for [unclear]

(15)

- Das Paristan Fante
U2 S 10/10/1
- Das Prataen
ob [unclear] in [unclear]
- 2 Rhogon stat [unclear]
at 8.35 am
17-08-2013

AS

17/08/13
Govt Maternity Hospital, Peshawar

DISCHARGE SLIP

Govt Maternity Hospital, Hashtnagar, Peshawar

GYNAECOLOGIST

Dr. Nayab Bilal
Dr. Ghazala Shams

M.O.S

Dr. Tahira
Dr. S. Saima
Dr. Roheen
Dr. Tanzeela
Dr. Shahnaz

Patient's Name Farah

w/o: Muskan Khan

Admission No 4617/282

Date of Delivery (Operation) 17-08-2013

Date of Discharge 17-08-2013

Diagnosis 8 P RFP
54

ATTES [unclear]

Condition on Admission

9 P FFP & 4 Pan
5 4

Operation / Delivery Notes

NND

B. 110

4388/244

Investigation

B. 4 1/2 B-ue

HBS/Hen - 1109

B. B. 4 1/2 O+ue

9. Khrugun stat min at
B. 35 Am
17-05-92

Baby Notes

Ad# 2942/244

Sex Female

Wt. 3.5 kg

A/s 9/10

Anomaly

Tetracal Cap.

Glyzifol Cap/syp



**GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT**

(REGULATION WING)

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

(H)
16
(S)

Diary No 745
Dated 13.8.12

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

S. O. Admi

RA
13/8

ATTESTED
A

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,

Majumdar
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.

Majumdar
7/8/12
SECTION OFFICER (REG: VI)

PPMS
(7)

(R)

I
Date:
Period:

(V7)

Teacher Name:

Name of School:

① Siraj Begum

G G H S Taru Jabba

15 years above

② Hafsa Begum

G G H S Pabbi

12⁰⁴/₂₀₁₀ To 05⁰³/₂₀₁₄

③ Saira Ibrar

G G M S Amankot

12⁰⁴/₂₀₁₀ To 05⁰³/₂₀₁₄

ATTESTED
f

OFFICE OF THE DISTRICT EDUCATION OFFICE (FEMALE), NOWSHERA
FINAL SENIORITY OF ARABIC TEACHER (FEMALE)

18

S#	School Name	Teacher Name	Father Name	Domicle	BPS	Academic Qualification	Sub V.A/T/Trd/	Date of Passing Professional Examination	BA Divn	Date of Birth	Date of 1 st Appoint	Date of Registrar Appoint (Trained)	Date Taking Over Charge Present Post	Date Taking over Charge in This Dist	Remarks
1	GCHS Jalozai	Parveen Akhtar	Chuliam Habib	Pesh	15	M.A	Nil	Nil	3rd	08/06/1954	15/04/1988	15/04/1988	15/04/1988	15/04/1988	
2	GCHS Nodah	Noureen Saifiq	Muhammad Saifiq	NSR	15	Middle	Nil	23/11/1993	Nil	13/05/1975	19/12/1994	19/12/1994	19/12/1994	19/12/1994	
3	GCHS Khair Ahsad	Saigra Bitt	Abdul Gul	NSR	15	B.A	Nil	22/02/1995	2nd	10/04/1971	29/11/1990	23/02/1995	23/02/1995	23/02/1995	
4	GCHS Khairk Bujling	Nasirfar	Durand Din	NSR	15	B.A	Nil	13/06/1993	Nil	31/03/1976	05/03/1996	06/03/1996	06/03/1996	06/03/1996	
5	GCHS Azadul Bala	Nighat Begum	Sulhmann Din	NSR	15	SQC	Nil	15/09/1993	Nil	01/03/1977	01/12/1995	01/12/1996	01/12/1996	01/12/1996	
6	GCHS NO. 2 NSR Kalan	Khifan Parveen	FAZAL-E-RAZIQ	NSR	15	S.S.C	Nil	Nil	-	14/8/1964	01/07/1987	01/07/1997	01/07/1997	01/07/1997	
7	GCHS ASC Centre	Asmat Rahman	Fazal Rahman	Swabi	15	BA	Nil	14/06/1992	2nd	26/12/1971	01/09/1992	24/07/1995	24/07/1995	05/04/2001	
8	GCHS Tare Jhilly	Faraj Begum	Qudus Sarwar	CHD	15	M.A	M.A	21/08/1995	2nd	15/04/1959	01/09/1996	01/09/1997	01/09/1997	01/09/2001	
9	GCHS NSR Khar	Sakoma	Sarfraz	CHD	15	SSC	Nil	11/01/1994	Nil	02/11/1975	01/09/1995	01/09/1995	01/09/1997	09/01/2004	
10	GCHS Akora Khair	Farah Jai	Bahar Gul	NSR	15	S.M.C	Nil	25/04/2001	-	13/04/1984	26/08/2005	26/08/2005	26/08/2005	26/08/2005	
11	GCHS Choa Ni Yr. Jhilly	Rasool Bibi	Sarwar Rahman	NSR	15	M.A(M)	Alamia	02/11/2002	2nd	01/04/1977	09/09/2005	09/09/2005	09/09/2005	09/09/2005	
12	GCHS Wazir Garhi	Shabina Gul	Mian Gul Rahim	NSR	15	M.A(Ed)	Alamia	27/06/1995	3rd	14/05/1981	05/05/2007	05/05/2007	05/05/2007	05/05/2007	
13	GCHS Gurdanemia	Roziya Begum	Abdul Jalil	NSR	15	FA	Alamia	19/10/2005	2nd	03/04/1983	21/04/2007	21/04/2007	21/04/2007	21/04/2007	
14	GCHS Tarkha	Zahida Begum	Jalir Shah	NSR	15	FA	Alamia	15/10/2005	Nil	07/03/1981	23/04/2007	23/04/2007	23/04/2007	23/04/2007	
15	GCHS D.L.Khad	Nadia Khan	Khalid Khan	NSR	15	B.A	Nil	03/11/2002	2nd	26/07/1981	23/04/2007	23/04/2007	23/04/2007	23/04/2007	
16	GCHS Khoshki Payan	Rasool Parveen	Sardar Khan	NSR	15	M.A	Alamia	25/10/2003	2nd	01/03/1979	24/04/2007	24/04/2007	24/04/2007	24/04/2007	
17	GCHS Baha	Farooq S. Khan	Muhammad Khan	NSR	15	FA	Alamia	18/10/2005	Nil	26/08/1981	25/04/2007	28/04/2007	28/04/2007	28/04/2007	
18	GCHS M.B. Bujling NSR	Muhammad Tariq	Haji Tariq Muhammad	NSR	15	M.A	Alamia/SEL	02/03/2004	2nd	02/04/1981	04/09/2005	17/09/2005	17/09/2005	01/05/2007	
19	GCHS No.2 Panni	Farah Nuz	Muhammad Khan	NSR	15	M.A	Alamia	22/09/2006	Nil	16/03/1972	02/07/2007	02/07/2007	02/07/2007	02/07/2007	

ATTESTED

FINAL SENIORITY OF ARABIC TEACHER (FEMALE)

19

S#	School Name	Teacher Name	Father Name	Domicile	BPS	Academic Qualification	Sub MA/Prof:	Date of Passing Professional Examination	BA Divn	Date of Birth	Date of 1 st Appnt:	Date of Regular Appnt: (Trained)	Date Taking Over Charge Present Post	Date Taking over Charge in This Dist	Remarks
20	GGMS Pir Pai	Rozeena Begum	Iraq Shah	NSR	15	F.A	Alamia	Nil		15-01-1974	10/04/2010	10/04/2010	10/04/2010	10/04/2010	
21	GGMS Ashoor Abad	Farhat Nawaz	Haji Noor ul Hassan	NSR	15	F.A	Alamia	10.05/2002	Nil	15/12/1973	12/04/2010	12/04/2010	12/04/2010	12/04/2010	2nd
22	GGMS Kandi Taza Din	Zeenat Warz	Redi Gul	NSR	15	BA	Alamia	22-09/2006	1st	11/08/1977	12/04/2010	12/04/2010	12/04/2010	12/04/2010	
23	GGHS NSR Cantt	Bibi Shazia	Azeem Khan	NSR	15	M.A	Arabic	01/02/2008	second	15/01/1978	12/04/2010	12/04/2010	12/04/2010	12/04/2010	3rd
24	GGHS NSR Cantt	Mah Gul	Aenar Uddin	NSR	15	B.A	Alamia	05.10/2002	Third	05-03-1978	12/04/2010	12/04/2010	12/04/2010	12/04/2010	
25	GGHS Mohib Banda	Shahnaz Sabir	Muhammad Sabir	NSR	15	BA	Alamia	13/09/2007	3rd	12/12/1979	12/04/2010	12/04/2010	12/04/2010	12/04/2010	
26	GGMS Habibullah Kor	Robina Bibi	Abdur Rahim	NSR	15	MA	Alamia	13-05-2007	2nd	05/01/1980	12/04/2010	12/04/2010	12/04/2010	12/04/2010	
27	GGHS ZKNS	Nasreen	Bahar ud- Din	NSR	15	M.A	Alamia	09/01/2008	2 nd	01/04/1980	12/04/2010	12/04/2010	12/04/2010	12/04/2010	
28	GGHS Pabbi	HAFSA BEGUM	MIAN IFTIKHAR HUSSAN	NSR	15	MA	Arabic+ Islamiyat	14/02/2006	2nd	29/05/1980	12/04/2010	12/04/2010	12/04/2010	12/04/2010	
29	ZAKHI QABRISTAN	Frah Shabir	Muhammad Shabir	NSR	15	B.A	Alamia	23/09/2006	2nd	25/02/1982	12/04/2010	12/04/2010	12/04/2010	12/04/2010	
30	GGHS AZA SHEL	DIL NAZ	SHAMSUL WAHAB	NSR	15	FSc:	Alamia	01/08/2006		12/03/1982	12/04/2010	12/04/2010	12/04/2010	12/04/2010	
31	GGMS Risalpur	Tahira	Reedi Gul	NSR	15	F.A	Alamia	09/01/2008		10/01/1983	12/04/2010	12/04/2010	12/04/2010	12/04/2010	
32	GGHS Dag Behsud	Salma Noreen	Rokhan Shah	NSR	15	F.A	Alamia	22/09/2006		05/02/1983	12/04/2010	12/04/2010	12/04/2010	12/04/2010	
33	GGHS Badraahi	Syeda Naureen	Syed Ihsanul Wahab	NSR	15	FA	Alamia	15/09/2007	2nd	28/5/1984	12/04/2010	12/04/2010	12/04/2010	12/04/2010	
34	GGMS Baghbanpura	Nageena	Mumtaz Hussain	NSR	15	BA	Alamia	Nil	1st	01/11/1984	12/04/2010	12/04/2010	12/04/2010	12/04/2010	
35	GGHS Pabbi	ISHRAT FATIMA	HABIB -UR - REHMAN	NSR	15	FA	Alamia	14/03/2005		14/04/1985	12/04/2010	12/04/2010	12/04/2010	12/04/2010	
36	GGHS Kotli Kafan	Naila	Taj Muhammad	NSR	15	MA	Alamia	01/09/2008	2nd	05-06-1985	12/04/2010	12/04/2010	12/04/2010	12/04/2010	
37	GGMS Pushtoon Garhi	Meena Hassan	Noorul Hassan	NSR	15	SSC	Alamia	27/09/2006	Nil	13/10/1986	12/04/2010	12/04/2010	12/04/2010	12/04/2010	

20

FINAL SENIORITY OF ARABIC TEACHER (FEMALE)

S#	School Name	Teacher Name	Father Name	Domicile	BPS	Academic Qualification	Sub MA/Proff:	Date of Passing Professional Examination	BA Diva	Date of Birth	Date of 1 st Appnt:	Date of Regular Appnt: (Trained)	Date Taking Over Charge Present Post	Date Taking over Charge in This Dist	Remarks
38	GGMS Makeen abad	Naveeda	Gul Azeem Khan	NSR	15	Matric	Alamia	A.T. Shahadat Alamia 13-03-2007	NIL	11-4-1985 04/11/1986	12/04/2010	12/04/2010	12/04/2010	12/04/2010	Misc Div
39	GGHSS Rashakai	Dilnaz Bibi	Tila Muhammad	NSR	15	FA	Alamia	03/07/2006	2nd	02/02/1989	12/04/2010	12/04/2010	12/04/2010	12/04/2010	3-10
40	GGMS Amankot	Saira Ibrar	Syed Ibrar Shah	NSR	15	B.A	Alamia	01/09/2008	1st	02/02/1989	12/04/2010	12/04/2010	12/04/2010	12/04/2010	
41	GGHS Nizampur	Fatima Begum	Raiz Afzal Khan	NSR	15	SSC	Shadatul Alamia	13/09/2007	Nil	02/12/1989	12/04/2010	12/04/2010	12/04/2010	12/04/2010	
42	GGHS Dheri Kati Khel	Zaibun Nisa	Ghulam Raheem	NSR	15	BA	Nil	25.10.2005	2nd	04/04/1979	13/04/2010	13/04/2010	13/04/2010	13/04/2010	
43	GGMS METHA KHEL	SIYARA	NOOR HUSSAIN	NSR	15	SSC	NIL	16/04/1905	NIL	25/01/1981	13/04/2010	13/04/2010	13/04/2010	13/04/2010	
44	GGMS Cheshmai	Guldasta	Muhammad Ghulam	NSR	15	SSC	NIL	22/09/2006	Nil	21/10/1982	13/04/2010	13/04/2010	13/04/2010	13/04/2010	
45	GGHSS Shaidu	Shaista Kiran	Tilawat Khan	NSR	15	SSC	Alamia	13/09/2007	---	16/02/1983	13/04/2010	13/04/2010	13/04/2010	13/04/2010	
46	GGMS Banda sheikh ismail	Bibi nazma	Imaddud din	NSR	15	SSC	Alamia	22/09/2006	Nil	17/03/1983	13/04/2010	13/04/2010	13/04/2010	13/04/2010	
47	GGHS Pir Pai	Saeeda Bano	Fujoon Khan	NSR	15	FA	Alamia	18/10/2005		17/03/1983	13/04/2010	13/04/2010	13/04/2010	13/04/2010	
48	GGMS Khawari	Raina	Gul Azeem Khan	NSR	15	Matric	Alamia	Shahadat-ul-aalimiyah	NIL	15/08/1984	13/04/2010	13/04/2010	13/04/2010	13/04/2010	
49	GGHS Kahi	Tallat Yasmin	Ahmad Shah	NSR	15	BA	Alamia	Shahad Alamia 2005	Nil	01/01/1985	13/04/2010	13/04/2010	13/04/2010	13/04/2010	
50	GGMS Spin kani Khurd	Salma Gul	Usman Ullah	NSR	15	SSc	Alamia	Nil	Nil	05/02/1987	13/04/2010	13/04/2010	13/04/2010	13/04/2010	
51	GGMS Nawab Kili NSR	Dur-i-Sadaf	Irfan Uddin	NSR	15	Matric	Alamia	26/06/1905	Nil	26/11/1987	13/04/2010	13/04/2010	13/04/2010	13/04/2010	
52	GGHS Jaaba Tar	Aneela Gul	Safed Shah	NSR	15	FA	Alamia	13/09/2007	Nil	23/3/1989	13/04/2010	13/04/2010	13/04/2010	13/04/2010	
53	GGMS Watar	Naeema Gul	Amin Shah	NSR	15	SSC	Alamia	13/09/2007	Nil	01/04/1984	14/04/2010	14/04/2010	14/04/2010	14/04/2010	
54	GGMS Dagi Qadoem	Madiha Sunis	Muhammad Younis	NSR	15	MA	Arabie	14.02.2006	1st	14.08/1982	16/04/2010	16/04/2010	16/04/2010	16/04/2010	
55	GGMS Pir Sabaq	Nusrat Sher	Muhammad Sher	NSR	15	FA	Alamia	01/09/2008	Nil	05/05/1984	19/04/2010	19/04/2010	19/04/2010	19/04/2010	

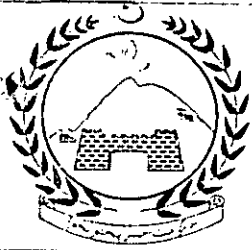
FINAL SENIORITY OF ARABIC TEACHER (FEMALE)

S#	School Name	Teacher Name	Father Name	Domicile	BPS	Academic Qualification	Sub MA/Prof:	Date of Passing Professional Examination	BA Divn	Date of Birth	Date of 1 st Appnt:	Date of Regular Appnt: (Trained)	Date Taking Over Charge Present Post	Date Taking over Charge in This Distt	Remarks
56	GGMS Nandrak	Shehla	Mumtaz Ali Khan	NSR	15	B.A	Alamia		2 nd	03/05/1980	01/06/2010	01/06/2010	01/06/2010	01/06/2010	
57	GGHS Inzari	Parveen	Khand Badshah	NSR	15	FA	Alamia	15/08/2008	2nd	01/02/1978	01/07/2010	01/07/2010	01/07/2010	01/07/2010	
58	GGMS Adarazai	Shahana	Fareed Gul	NSR	15	SSC	Alamia	13/09/2007	Nil	02/01/1984	04/12/2010	04/12/2010	04/12/2010	04/12/2010	
59	GGMS Islamabad	Rozina	Gul Azeem Khan	NSR	15	Matric	Alamia	AT-2007	Nil	10/10/1987	04/12/2010	04/12/2010	04/12/2010	04/12/2010	
60	GGMS Saddar Abad	Sameen	Akbar Ali	NSR	15	F.A	Alamia	18/10/2005	AT	12/09/1983	25/05/2012	25/05/2012	25/05/2012	25/05/2012	
61	GGMS Gul Dheri	Khadija	Syed MA Shah	NSR	15	MA (Isl)	Alamia	31/01/2007	2nd	15/06/1981	25/05/2012	25/05/2012	25/05/2012	25/05/2012	
62	GGMS Zara Miara	Ghazala Rasheed	Abdur Rasheed	NSR	15	BA	Alamia	00/01/1900	2nd	08/12/1986	25/05/2012	25/05/2012	25/05/2012	25/05/2012	
63	GGMS Marhata Banda	Kosar perveen	Misal Khan	NSR	15	F.A	Alamia	Shahadat ul Alia	Nil	16/05/1983	26/05/2012	26/05/2012	26/05/2012	26/05/2012	
64	GGMS Mughalkaj	Aqal Meena	Khadi Gul	NSR	15	FA	Alamia	01/09/2008	2nd	01/01/1985	26/05/2012	26/05/2012	26/05/2012	26/05/2012	
65	GGMS Kotarpan	Hifsa Bibi	Fazli Nisajla	NSR	15	MA (Isl)	Alamia	08/12/2010	2nd	04/10/1989	26/05/2012	26/05/2012	26/05/2012	26/05/2012	
66	GGHS Mandoori	Summaya	Saeed Ullah	NSR	15	FA	Alamia	17/09/2007	Nil	07/05/1991	26/05/2012	26/05/2012	26/05/2012	26/05/2012	
67	GGHS Hassan Khel	Basirat	Zir Dil	NSR	15	FA	Alamia	22/09/2006	Nil	01/01/1993	26/05/2012	26/05/2012	26/05/2012	26/05/2012	
68	GGMS Turlandi	Munaza Nisar	Nisar Muhammad	NSR	15	M.A	Alamia	A.T 2010	2nd	30/12/1977	28/05/2012	28/05/2012	28/05/2012	28/05/2012	
69	GGHS Berabarza	Shaista	Noor Jamal	NSR	15	M.A (Isl)	Alamia	26/08/2010	2nd	01/03/1980	25/05/2012	25/05/2012	28/05/2012	28/05/2012	
70	GGMS Gul Din Korona	Salma Baig	Firdos Khan	NSR	15	MA	Arabic	02/04/2011	2nd	04/03/1980	28/05/2012	28/05/2012	28/05/2012	28/05/2012	
71	GGMS Shiekhi	Tayyiba Rafique	Muhammad Rafique	NSR	15	MA	Arabic	07/03/2011	2nd	04/05/1982	25/05/2012	28/05/2012	28/05/2012	28/05/2012	
72	GGMS Hsartang	Shahwar Bibi	Shad Muhammad	NSR	15	MA	Alamia	12/08/2010		30/08/1983	28/05/2012	28/05/2012	28/05/2012	28/05/2012	
73	GMS Shah Kot Peran	Shahida Gul	Umar Gul	NSR	15	MA (Isl)	Alamia	AT-2010		05/03/1987	28/05/2012	28/05/2012	28/05/2012	28/05/2012	
74	GGMS PALOSI PAYAN	SamiaZar	Zar Ali Shah	NSR	15	MA	Arabic + Islamiat	18/02/2009	2 nd	20/04/1985	30/05/2012	30/05/2012	30/05/2012	30/05/2012	
75	GGHS Akbar Pura	Zuhaida	Muhammad Younis	Pesh	15	MA	Arabic	01/10/1996	2nd	12/01/1978	30/06/1997	30/06/1997	30/06/1997	30/06/2012	
76	GGMS Garoo	Beena Nawaz	Amir Nawaz	NSR	15	B.A	Alamia	21/02/2008	2 nd	27/08/1982	25/05/2012	25/05/2012	28/05/2012	28/05/2012	

75. Nadia Begum Mumtaz Ali NSR 15 F.A Alamia 1-9-2008 - 8-8-1982 2010 2010 2010 2010 2010 3rd

*Liaqat Ali
Supalli
Mardan*

*J
(2)*



**GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
(REGULATION WING)**

POSTING/TRANSFER POLICY OF THE PROVINCIAL GOVERNMENT

- i) All the posting/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 posing/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) ¹Existing tenure of posting/transfer of three (03) years for settled areas and two (02) years for unattractive/hard areas shall be reduced to two (02) years for settled areas, 01½ years for unattractive areas and one year for hard areas.

(See P-06 as retained)

v) ² { }

2 years tenure retained vide P-06 for un-attractive/hard area

(vi) ³While making posting/transfers of officers/officials up to BS-17 from settled areas to FATA and vice versa approval of the Chief Secretary, Khyber Pakhtunkhwa needs to be obtained. Save Tehsildars/Naib Tehsildars within a division in respect of whom the concerned Commissioner will exercise the same power. 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, Khyber Pakhtunkhwa shall be obtained."

Provided that the power to transfer Political Tehsildars and Political Naib Tehsildars within FATA between different divisions shall rest in Additional Chief Secretary FATA.

vi (a)¹ 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 DPOs/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.

¹ Circular letter No. SOR-VI/E&AD/1-4/2008/Vol-VII dated, the 11th September, 2009
² 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 3-5-2008. Consequently authorities competent under the Khyber Pakhtunkhwa 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.
³ Para-VI added vide circular letter No. SOR-VI E&AD/1-4/2010/Vol-VIII dated 20th March, 2010.
⁴ Sub para-VI (a) added vide circular letter No. SOR-VI/E&AD/1-4/2008 dated 22nd October, 2008.

ATTACHED
[Signature]

- 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 Districts 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 Khyber PakhtunKhwa 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 column2 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-19 & 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: a) Within the same Department	Secretary of the Department concerned.

¹ Added vide Urdu circular letter No: SOR-VI (E&AD)/1-4/2005, dated 9-9-2005.

ATTESTED

b) To and from an Attached Department	Secretary of the Department 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 posing/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.

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.

ATTESTED

→

Updated up to April, 2010.

25

✓ 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 KHYBER PAKHTUNKHWA
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 KHYBER PAKHTUNKHWA

Endst. No. and date even.

Copy forwarded

- 1.
- 2.
- 3.
- 4.

ATTESTED



(NAME)
SECTION OFFICER
Administrative Department

{Authority: Letter No. SO (E-I) 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 Khyber PakhtunKhwa 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,

to this effect

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) 1-4/2008: 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)/05 dated 28th Oct. 2005.

The Chief Minister Khyber PakhtunKhwa 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;
- 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 8-6-2004 & Urdu Letter No: SOR-VI/E&AD/Misc: /2005, dated 3-1-2006.}

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) Khyber PakhtunKhwa 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 decide 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 Khyber PakhtunKhwa Govt Servants (Conduct) Rules 1987 shall be proceeded against under the Khyber PakhtunKhwa Removal from Service (Special Powers) Ordinance 2000. As required under the Khyber PakhtunKhwa 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

Updated up to April, 2010.

6 (27)

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 Secretaries. Administrative Secretaries shall ensure submission of such reports.

{Authority: - Urdu circular No: SOR-VI (E&AD)/1-4/06, dated. 29-6-2007}.

"In continuation of this Department circular letter No.SOR-VI/E&AD/1-4/2008/Vol-VII dated 11th September, 2009, I am directed to refer to the subject and to say that the Provincial Cabinet in its meeting held on 30th March, 2010 inter-alia approved the following for the purpose of Posting/Transfer Policy:-

Unattractive/Hard Areas

1. ✓ The distinction between unattractive/hard areas should be done away with and both should be labeled as Unattractive areas. ✓
2. Existing list of FATA areas be retained.
3. The following areas were recommended/approved to constitute unattractive areas in NWFP:-

- a. Kohistan District.
- b. Tank District.
- c. Chitral District.
- d. Batgram District.
- e. Shangla District. ✓
- f. Hangu District.
- g. PATA areas of Mansehra (Kala Dhaka)

b) Tenure for settled area 03 years
2, unattractive area is 02 ✓
(P-I)

Tenure of posting.

- i. ✓ The erstwhile normal tenure of 2 years be retained. ✓
- ii. Existing tenure for unattractive areas be retained. However, in case of married civil servants, transfer should be made just at the beginning of school session and tenure should be one year instead of 1.5 year, so that academic disruptions are avoided.
- iii. At the time of entry in service, all civil servants be asked to give 4 options from unattractive areas.
- iv. After a stint of service in unattractive area, employees may be offered option to serve in district of choice.

ATTESTED

7 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 is 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

No. SOR-VI/E&AD/1-4/2010/Vol-VIII Dated Peshawar, the 10th April, 2010
Placement Policy has been made part of the posting/transfer policy vide Urdu circular No.SOR-VI(E&AD)1-4/06, dt 9-2-2007

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 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 intuitions 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 participants will decline/represent against his/her posting.



GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT

(REGULATION WING)

NO. SOR.VI (E&AD)1 -4/2005/Vol-II

Dated Peshawar, 27th February, 2013

K
29

To
[Handwritten signature]

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.

Department
Khyber Pakhtunkhwa
27/2/2013

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.
- (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.

[Handwritten initials]
4/3

[Handwritten signature]

[Handwritten signature]
Secy

[Handwritten signature]
Secy Est

ATTESTED

[Handwritten signature]

- (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 on 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)

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

Appeal No 409/2014

Mst. Farah Shabir.....Appellant

VERSUS

1- Secretary (E & S) Education Khyber Pakhtunkhwa, Peshawar & others.
..... Respondents

Respectively Sheweth

Written comments/reply on behalf of respondent No 1,2,3.

Preliminary Objections

1. That the Appellant has no cause of action/locus standi to file the instant appeal.
2. That this Honorable Service Tribunal has got no jurisdiction to entertain the present appeal.
3. That the present Appeal is bad for non-joinder and mis joinder of necessary parties.
4. That the instant appeal is badly time barred.
5. That the appellant has concealed material facts from this Honorable Service Tribunal.
6. That the appellant is estopped by his own conduct, by deed and by law to file the instant appeal.
7. That the instant appeal is barred by law.

On Facts

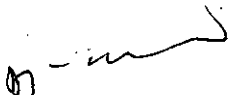
1. Correct to the extent of appointment order dated 9/4/2010, however the appellant took over charge on 12/4/2010 and not on 12/4/2013 and since then the appellant perform her duties in GGMS ZakhiQabristan and already completed her tenure in the said school.
2. Pertains to the petitioner record.
3. Subject to proof.
4. (a) Incorrect. The transfer order was made in the best public interest. According to section 10 of civil servant Act a civil servant is liable to serve anywhere.
- 4 (b) Incorrect pertains to the record.
- 5 No Comments

Grounds:

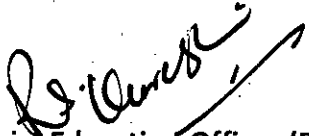
- A. In Correct. The order dated 9/10/2013 is according to law, rules and policies.
- B. Pertains to record however the appellatant is posted in the same district.
- C. Incorrect.
- D. Incorrect. The impugned order issued in the best public interest and the appellatant completed her tenure.
- E. Incorrect. The transfer of the appellatant is according to law, rules and policy.
- F. Incorrect. The appellatant completed her tenure at GGMS ZakhiQabristan
- G. Incorrect. The appellatant is completed her tenure and none has a right in a specific place or post.
- H. The Respondents also seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore, requested before your honor that the present appeal is illegal, against facts and without force, may kindly be dismissed with cost.

Respondent No.1


Secretary (E&S) Educ; Department,
Govt: of KPK.

Respondent No.2&3


District Education Officer (F)
Nowshera

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

Appeal No 409/2014

Farah Shabir.....Appellant

VERSUS

1- Secretary (E & S) Education Khyber Pakhtunkhwa, Peshawar & others.
..... Respondents

AFFIDAVITE

I Robina Qureshi District Education Officer (F) Nowshera do solemnly affirmed and declare on oath that the contents of Par wise comments/ reply on behalf of respondent are true and correct to the best of my knowledge and nothing has been concealed from this Honourable Tribunal.

R. Qureshi
26.6.14.
Deponent

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

Appeal No 409/2014

Mst. Farah Shabir.....Appellant

VERSUS

1- Secretary (E & S) Education Khyber Pakhtunkhwa, Peshawar & others.
..... Respondents

REPLY TO THE APPLICATION FOR INTERIM RELIEF

Respectfully Sheweth:-

1. That the subject appeal is pending before this Honorable Tribunal in which the next date of hearing is 15/7/2014.
2. That the transfer order was passed in the best public interest and according to the rules and policy.
3. That the appellant has not been discriminated.
4. That the ground of the para wise comments may also be considered as in integral part of this application.
5. That the respondent has a good prima facie case and all the three ingredients are in favor of respondent.

It is, therefore, requested before your honor that the present writ petition is being without force against facts may kindly be dismissed.

Respondent No.3



District Education Officer (F)
Nowshera

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

Service Appeal No. 409/2014

Farah Shabir

VS

Education Deptt:

.....

REJOINDER ON BEHALF OF APPELLANT

.....

RESPECTFULLY SHEWETH:

Preliminary Objections:

(1-7) All objections raised by the respondents are incorrect and baseless. Rather the respondents are estopped to raise any objection due to their own conduct.

FACTS:

- 1 No comments.
- 2 Incorrect. the service certificate of the husband of the respondents No.4, which is attached with the reply of private respondent No.4 is a private company servant and the notification dated 15.2.2003 is for Govt: servant and is not for private company servant, in which it is clearly mentioned that efforts would be made to post husband and wife at one station, if both are in provincial services.
- 3 It has been relieved from the service record of the appellants that no complaint has been filed against the appellants.
- 4 Incorrect. The transfer order dated 9.11.2013 was made not in public interest, but on the basis of

implied political whim. Moreover the spouse policy is *not* ~~comply~~ on the respondent No.4 as the husband of the respondent No.4 is not a Govt: servant, but he is serving in a private company and the spouse policy in the notification dated 15.2.2003 is for Govt: servants and not for private company servants.

- 5 The record revealed that the appellant has filed departmental appeal on 11.12.2013, but the respondent department did not respond to the departmental appeal in the statutory period of ninety days.
- 6 Incorrect. The appellant has right to come this august Tribunal on the following grounds.

GROUND:


- A) Incorrect. The order dated 9.11.2013 is against the law, rules and norms of justice being premature, politically motivated, violation of Govt: circulars, therefore not tenable in law.
- B) Incorrect. Hence denied.
- C) Incorrect, the husband of the respondent No.4 is not a Govt: servant, but he is serving in a private company and the spouse policy in the notification dated 15.2.2003 is for Govt: servants and not for private company servants, therefore the husband of private respondent do not avail the facility of spouse policy.
- D) Incorrect. While para D of the appeal is correct.
- E) Incorrect. The transfer of the appellant is not according to law, rules and policy, but it is against of Govt: posting transfer policy and circular based on the Anita Turab case dated 27.2.2013.


- F) Incorrect. While para F of the appeal is correct.
- G) Incorrect. While para G of the appeal is correct.
- H) Incorrect. The appellant has right to advance any ground and proof at the time of hearing.

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

APPELLANT
Farah Shabir

Through:


(M. ASIF YOUSAFZAI)
ADVOCATE, PESHAWAR.

& 
(TAIMUR ALI KHAN)
ADVOCATE, PESHAWAR.

AFFIDAVIT

It is affirmed and declared that the contents of rejoinder are true and correct to the best of my knowledge and belief.


DEPONENT

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

Service Appeal No. 409/2014

Farah Shabir

VS

Education Deptt:


R.SHEWETH:

1. No comments.
2. Incorrect. The impugned transfer order was not passed in public interest, but due to political interference and in violation of transfer posting policy, spouse policy.
3. Incorrect. The appellant has been discriminated as many other AT teachers with longer tenure have been left, while appellant has been made escape goat.
4. Incorrect. This para of the application is not useless and worthless and liable to entertain able.
5. Incorrect. The appellant has good prima facie case and all the three ingredients are in favour of the appellant.

It is therefore most humbly prayed that the operation of the order dated 19.11.2013 may be suspended till the decision of main appeal.

APPELLANT
Farah Shabir

Through:


(M. ASIF YOUSAFZAI)
Advocate

&



(TAIMUR ALI KHAN)
ADVOCATE, PESHAWAR.

AFFIDAVIT

It is affirmed and declared that the contents of this reply are true and correct to the best of my knowledge and belief.



DEPONENT

ATTESTED



BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR.

Farah Shabir

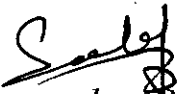
Versus


DEO Nowshera & others

INDEX

<i>S.No.</i>	<i>Description of documents</i>	<i>Annexure</i>	<i>Pages</i>
<i>1.</i>	<i>Reply of the appeal</i>		<i>1-4</i>
<i>2.</i>	<i>Reply of the application</i>		<i>5-6</i>
<i>3.</i>	<i>Copy of the charge report of the respondent No.4</i>	<i>"A"</i>	<i>7</i>
<i>4.</i>	<i>Copy of the service certificate of the husband of respondent No.4</i>	<i>"B"</i>	<i>8</i>
<i>5.</i>	<i>Copy of the birth Certificate of the children and maternity certificate of the respondent No.4</i>	<i>"C"</i>	<i>9-11</i>
	<i>Wakalat Nama</i>		<i>In original</i>

Dated 13/06/2014


Respondent No.4
Through


Gohar Ali
Advocate High Court,
Peshawar.

1

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR.

Farah Shabir

Versus

DEO Nowshera & others

REPLY ON BEHALF OF THE RESPONDENT
NO.4

Respectfully Sheweth:

Preliminary objections:

- 1) *The appellant has got no cause of action.*
- 2) *The appellant being a civil servant can be transferred any wherein the province as per S-10 of Civil Servant Act.*
- 3) *The appellant has no locus standi to file such appeal.*
- 4) *The appeal is not maintainable in its present form.*
- 5) *The appellant is estopped due to her own conducts.*
- 6) *The grounds forwarded by the appellant is the same as having respondents No.4.*
- 7) *That both of appellant & Respondent No.4 are residents of the same stations/village.*

On facts:

- 1) That Para No.1 of the appeal is incorrect and denied as reveals that appellant has completed the service tenure at Zakhi Qabristan, 3 ½ years. Needs to be transferred and the respondent should be given a chance as Respondent No.4 has completed her tenure at Nawakali Nowshera and husband of Respondent No.4 is also serving near Zakhai Qabristan at Northern Bypass Peshawar as Annexure "A" (Certificate and charge report of Respondent No.4).
- 2) That Para No.2 of the appeal is correct upto the extent of appellant husband but since 1995 for 19 years he should also be transferred along with the appellant as Respondent No.4 husband is also serving at nearest station Northern Bypass so denied as Annexure "B". (Service Certificate of the husband of the respondent No.4).
- 3) That Para No.3 of the appeal is not commenced as pertaining to the department.
- 4) That Para No.4 of the appeal is incorrect and denied that respondent No.4 having spouse policy as her husband is also serving nearest the Village, School Zakhi Qabristan so the transfer is made according to rules and law as certificate allotted as Annexure "B".

5) *No comments.*

6) *That Para No.6 of the appeal is incorrect and denied as appellant is not entitled to further argue due to misstatement and illegally getting the benefit of policy.*

Grounds:

A) *That Ground A of the appeal of the appellant denied as the order dated 19/11/2013 is according to the law and posting transfer policy and matured not political motivated so denied.*

B) *That Ground B of the appeal of the appellant is not based on fact as such problems have been faced by respondent No.4 also but completed tenure and now transferred to home station so denied as copy attached as Annexure "C". (Birth Certificate of Children and Pre-maternity certificate of the Respondent No.4).*

C) *That Ground C of the appeal of the appellant is incorrect and denied as the transfer order has been passed according to law and rules as husband respondent No.4 not private but Semi Government/ autonomous body servant. Copy attached as Annexure "B".*

D) *That Ground D of the appeal is denied as incorrect.*

4
E) That Ground E of the appeal is incorrect so denied as according to posting transfer policy as copy attached as Annexure "B".

F) That Ground F of the appeal is incorrect as concealment of fact that appellant was appointed at Zakhi Qabristan dated 09/04/2010 and still now has completed 3 ½ years, tenure of service is liable to be transferred, so denied.

G) That for Ground G no comments as pertaining to the department.

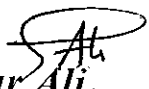
H) That appellant has no right to advance any ground already not aken.

It is, therefore, humbly prayed that on acceptance of the reply of the appeal, the appeal of the appellant may please be dismissed with costs.

Dated 13/06/2014


Respondent No. 4.

Through


Gohar Ali
Advocate High Court,
Peshawar.

5

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR.

Fara Shabir

Versus

DEO Nowshera & others

REPLY TO APPLICATION FOR
SUSPENSION OF ORDER DATED
19/11/2013

Respectfully Sheweth:

- 1) *That Para under reply is with respect to the following:*
- 2) *That Para under reply is incorrect and denied as the transfer order is neither political nor against the spouse policy but according to the posting and transfer policy as completing tenure.*
- 3) *That this para of application is not a special case, the respondent No.4 was also having the same problem. The respondent No.4 is at the stage of maternity unable to cover long distance while after two months leave appellant sucking child would be ^{one year}~~two years~~ and mature at P-15 of appeal and the Annexure "C" of the reply. So this ground of the application is incorrect and denied.*

- 4) That para of application is useless and wroth less so denied.
- 5) That Para under reply is incorrect and denied as S Court had held that there is no irresponsible loss in transfer cases, after accepting of this reply he can be transfer and it is also held by the superior court that stay should not be given in transfer case.

It is, therefore, humbly prayed that on acceptance of this reply to the application the application of the appellat / applicant may please be dismissed with cost.

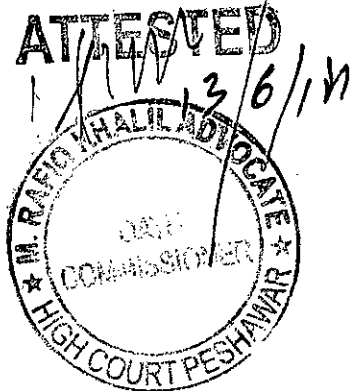
Dated /3/06/2014

Sealed
Respondent No.4
Through

At
Gohar Ali
Advocate High Court,
Peshawar.

Affidavit

It is stated on oath that the contents of this reply are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.



Sealed
DEPONENT

N.K.A. 17201-2431864-8



BP-8

NASRULLAH JAN INAMULLAH KHAN & COMPANY (Pvt.) Ltd

112 NIC House, Islamia College Colony, Canal Town, Peshawar
Tel : 091-2604754, Fax: 091-2604791, Email : msnic01 @ yahoo. com



To Whom It May Concern

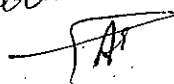
This is certified that

Mr. Wisal Khan S/O Mr. Khalifa is working with this organization as Mason Since 2011 to Till date on our Road Project Peshawar Northern By Pass Project Package-I.

During this period, we found him honest, efficient, obedient and dutiful and professionally good. The under signed feel no hesitation to recommend him as Mason to any organization in Pakistan or abroad.

We wish him success in his future life.



AUTHORIZED REPRESENTATIVE
M/S NIC (PVT) LTD

Attested


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

Service Appeal No. 409/2014

Farah Shabir

VS

Education Deptt:

.....
REJOINDER ON BEHALF OF APPELLANT
.....

RESPECTFULLY SHEWETH:

Preliminary Objections:

(1-7) All objections raised by the respondents are incorrect and baseless. Rather the respondents are estopped to raise any objection due to their own conduct.

FACTS:

- 1 No comments.
- 2 Incorrect. the service certificate of the husband of the respondents No.4, which is attached with the reply of private respondent No.4 is a private company servant and the notification dated 15.2.2003 is for Govt: servant and is not for private company servant, in which it is clearly mentioned that efforts would be made to post husband and wife at one station, if both are in provincial services.
- 3 It has been relieved from the service record of the appellant that no compliant has been filed against the appellant.
- 4 Incorrect. The transfer order dated 9.11.2013 was made not in public interest, but on the basis of -

implied political whim. Moreover the spouse policy is *not* ~~comply~~ on the respondent No.4 as the husband of the respondent No.4 is not a Govt: servant, but he is serving in a private company and the spouse policy in the notification dated 15.2.2003 is for Govt: servants and not for private company servants.

- 5 The record revealed that the appellant has filed departmental appeal on 11.12.2013, but the respondent department did not respond to the departmental appeal in the statutory period of ninety days.
- 6 Incorrect. The appellant has right to come this august Tribunal on the following grounds.

GROUNDS:

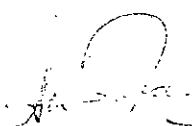
- A) Incorrect. The order dated 9.11.2013 is against the law, rules and norms of justice being premature, politically motivated, violation of Govt: circulars, therefore not tenable in law.
- B) Incorrect. Hence denied.
- C) Incorrect, the husband of the respondent No.4 is not a Govt: servant, but he is serving in a private company and the spouse policy in the notification dated 15.2.2003 is for Govt: servants and not for private company servants, therefore the husband of private respondent do not avail the facility of spouse policy.
- D) Incorrect. While para D of the appeal is correct.
- E) Incorrect. The transfer of the appellant is not according to law, rules and policy, but it is against of Govt: posting transfer policy and circular based on the Anita Turab case dated 27.2.2013.

- F) Incorrect. While para F of the appeal is correct.
- G) Incorrect. While para G of the appeal is correct.
- H) Incorrect. The appellant has right to advance any ground and proof at the time of hearing.

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

APPELLANT


Part to Shauir


(M. ASIF YOUSAFZAI)
ADVOCATE, PESHAWAR.

& 
(TAIMUR ALI KHAN)
ADVOCATE, PESHAWAR.

AFFIDAVIT

It is affirmed and declared that the contents of rejoinder are true and correct to the best of my knowledge and belief.


DEPONENT

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

Service Appeal No. 409/2014

Farah Shabir

VS

Education Deptt:

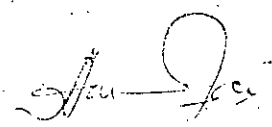
R.SHEWETH:

1. No comments.
2. Incorrect. The impugned transfer order was not passed in public interest, but due to political interference and in violation of transfer posting policy, spouse policy.
3. Incorrect. The appellant has been discriminated as many other AT teachers with longer tenure have been left, while appellant has been made escape goat.
4. Incorrect. This para of the application is not useless and worthless and liable to entertain able.
5. Incorrect. The appellant has good prima facie case and all the three ingredients are in favour of the appellant.

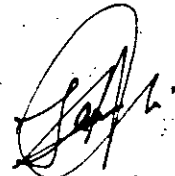
It is therefore most humbly prayed that the operation of the order dated 19.11.2013 may be suspended till the decision of main appeal.

APPELLANT
Farah Shabir

Through:


(M. ASIF YOUSAFZAI)
Advocate

&



(TAIMUR ALI KHAN)
ADVOCATE, PESHAWAR.

AFFIDAVIT

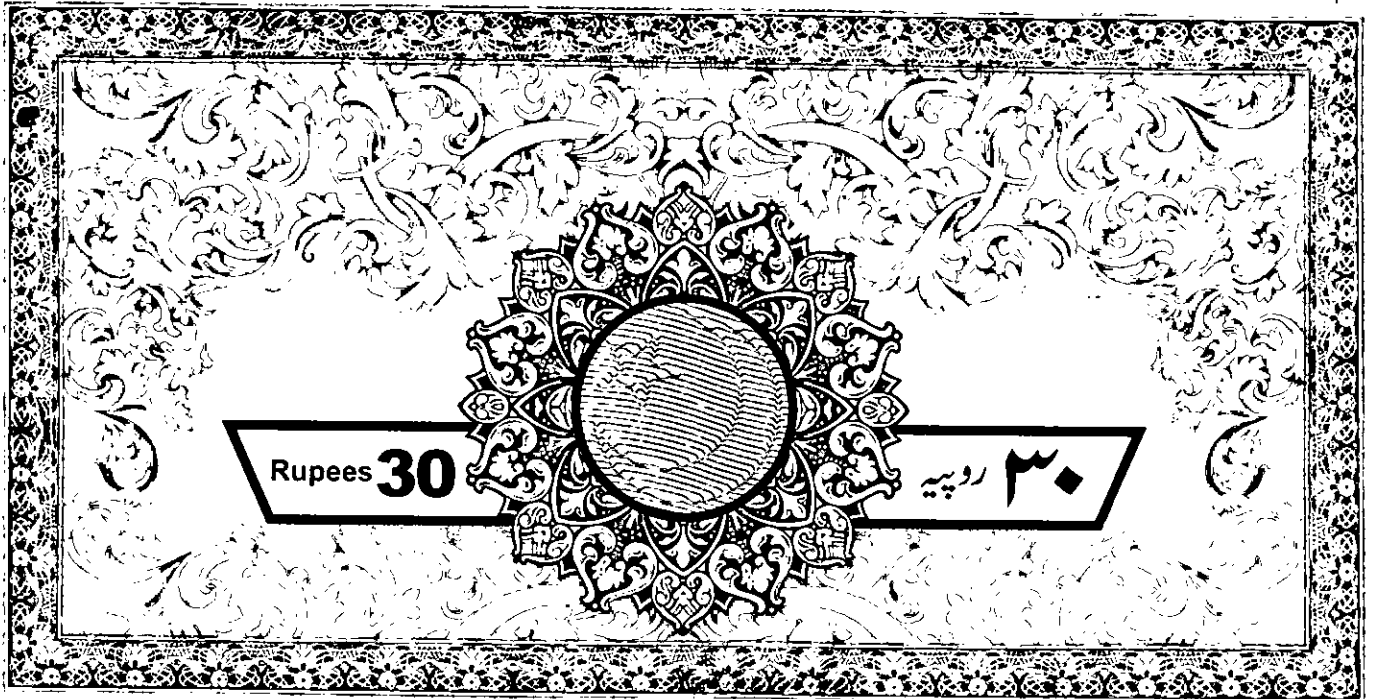
It is affirmed and declared that the contents of this reply are true and correct to the best of my knowledge and belief..



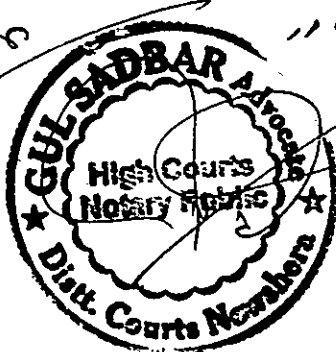
DEPONENT

ATTESTED





Handwritten text at the top: کبریا صاحبہ جو سرو شہینزادہ اور
ممتازہ بیگم درصوف



Handwritten text in the middle section:
عزت و نام و اولاد کے لئے مندرجہ ذیل پر مشتمل
بیانہ مندرجہ ذیل کے لئے مندرجہ ذیل پر مشتمل
میں خود غرضی پر مشتمل ہے۔ گندہ سیدی کے لئے مندرجہ ذیل پر مشتمل
در ضلعیت کے لئے مندرجہ ذیل پر مشتمل ہے۔
آج کے عدالت حضور میں مندرجہ ذیل پر مشتمل ہے۔
مندرجہ ذیل پر مشتمل ہے۔
مندرجہ ذیل پر مشتمل ہے۔

Handwritten text on the right side:
۱۷۲۰۱-۲۴۳۱-۸۶۴-۵
کبریا صاحبہ جو سرو شہینزادہ اور
ممتازہ بیگم درصوف

ATTESTED
۱۷۲۰۱-۲۴۳۱-۸۶۴-۵
Handwritten signatures and text at the bottom.

١١
2 13

مستوفى
١٠٤٣ هـ
مستوفى
١٠٤٣ هـ
مستوفى
١٠٤٣ هـ

مستوفى
١٠٤٣ هـ

STAMP
22
2013



OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) NOWSHERA

[Handwritten mark]

OFFICE ORDER

The competent authority has been pleased to transfer the following Teacher to the School noted against her name on their own pay and scale in the interest of Public Service with immediate effect.

S.#	Name of Teacher	Designation	From	To	Remarks
1	Farah Shabeer	AT BPS 15	GGMS Nawan Killi (NSR)	GGMS Babi Qadeem (NSR)	A.V.P. Newly upgraded

- Note:-
1. No TA/DA is Allowed
 2. Charge Reports should be submitted to the all concerned.

(ROBINA QURESHI)
DISTRICT EDUCATION OFFICER
(FEMALE)NOWSHERA.

Order No. 2279-81

Dated Nowshera the 01/11/2014.

Copy for information to the:-

1. Senior District Accounts Officer Nowshera.
2. Head Mistress GGMS Nawan Killi (NSR).
3. Official concerned.

[Handwritten signature]
DISTRICT EDUCATION OFFICER
(FEMALE)NOWSHERA

[Handwritten mark]



OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) NOWSHERA

OFFICE ORDER

The competent authority has been pleased to transfer the following Teacher to the School noted against her name on their own pay and scale in the interest of Public Service with immediate effect.

S.No	Name of Teacher	Designation	From	To	Remarks
1	Farah Shabeer	AT BPS 15	GGMS Nawan Killi (NSR)	GGMS Babi Qadeem (NSR)	A.V.P. Newly upgraded

Note:- 1. No TA/DA is Allowed

2. Charge Reports should be submitted to the all concerned.

(ROBINA QURESHI)
DISTRICT EDUCATION OFFICER
(FEMALE)NOWSHERA.

Endst: No. 2279-81

Dated Nowshera the 01/11/2014.

Copy for information to the:-

1. Senior District Accounts Officer Nowshera.
2. Head Mistress GGMS Nawan Killi (NSR).
3. Official concerned.

R. Qureshi
DISTRICT EDUCATION OFFICER
(FEMALE)NOWSHERA

[Signature]

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

No. 292 /ST

Dated. 22 /2 /2016


To

The Director E&SE,
Peshawar.

Subject: - Judgement.

I am directed to forward herewith certified copy of Judgement dated 10.2.2016 passed by this Tribunal on subject for strict compliance.

Encl: As above


REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.