

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. 1478/2018

Date of Institution ... 12.12.2018

Date of Decision ... 20.12.2019

Mst. Naseem Begum, PSHT (BPS-15), Malakand GGPS Gulo Shah, Tehsil Dargai,
District Malakand. ... (Appellant)

VERSUS

The Secretary E&SE Department, Khyber Pakhtunkhwa Peshawar and three others.
... (Respondents)

MR. NOOR MUHAMMAD KHATTAK,
Advocate

--- For appellant.

MR. MUHAMMAD JAN,
Deputy District Attorney

--- For respondents

MR. AJMAL KHAN,
Advocate

--- For private respondent no.4

MR. AHMAD HASSAN
MR. MUHAMMAD HAMID MUGHAL

--- MEMBER(Executive)
--- MEMBER(Judicial)

JUDGMENT:

AHMAD HASSAN, MEMBER:- Arguments of the learned counsel for the
parties heard and record perused.

ARGUMENTS:

02. Learned counsel for the appellant argued that she was appointed as PST (BPS-12) in the respondent-department and finally reached the rank of PSHT (BPS-15). That she was transferred to GGPS Gulo Shah, Union Council Sakhakot Bandajat vide order dated 21.02.2013. As the appellant hailed from union council Sakhakot Khaas, so had to cover long distance for reaching the place of her duty and also had completed normal tenure at the previous station. Due to retirement of

Mst. Taj-ul-Wara a post of PSHT became vacant at GGPS no.2 Sakhakot Khaas. The appellant under Section-3 of Khyber Pakhtunkhwa Transfer/Posting Regulatory Act, 2011 submitted an application to respondent no.3 for transfer. However, vide impugned order dated 04.09.2018 private respondent no.4 a bonafide resident of Union Council, Ghari Usmani Khel was transferred to GGPS Sakhakot no.2. Feeling aggrieved, she filed departmental appeal but to no avail. During the pendency of departmental appeal, the appellant filed writ petition no. 1053/2018 before Peshawar the Daar-ul-Qaza, Swat, which was not entertained for want of jurisdiction vide order dated 13.11.2018.

03. ... Learned counsel for the appellant further argued that impugned transfer order was issued after getting approval of the Nazim which was illegal and unlawful. Nazim had not role to play in the posting/transfer of the staff of the Education Department. It amounts to political interference. Moreover, posting order against future vacancy was also void being bereft of laid down procedure. The appellant being a widow also deserved to be treated sympathetically.

04. ... Learned counsel for private respondent no.4 argued that she belongs to the same union Council and had spent 29 years in GGPS Anargai. That the private respondent also become a victim of political interference. As the appellant had not been affected by the impugned transfer order, so she had no cause of action to contest the present service appeal. Reliance was placed on case law reported as 2000 SCMR 141, 2011 PLC (C.S) 312 and 2012 PLC (C.S) 1446.

05. Learned District Attorney relied on the arguments advanced by the learned counsel for private respondent.

CONCLUSION:

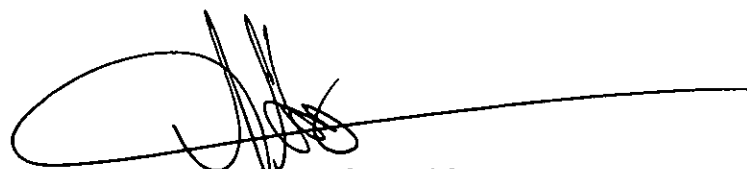
06. The present service appeal relates to posting against a post of PSHT vacated due to retirement of Mst. Taj ul Wara at GGPS no.2 Sakhakot. Through, the impugned order dated 04.09.2018, private respondent no.4 was transferred from GGPS Anar Tangi to GGPS no.2 w.e.f. 01.10.2018. It is not disputed that these posts are required to be filled from amongst the residents of the same Union Council or in case of non-availability employee be adjusted ^{from} the adjacent Union Council. Though, the learned counsel for the private respondent no.4 contended that she hailed from Union Council, Sakhakot Khas but record appended by the learned counsel for the appellant clearly indicated that she was resident of Union Council, Ghari Usmani Khel. On the other hand the appellant was a permanent resident of Sakhakot Khaas. Therefore, strictly going by the rules, she should not have been adjusted in the said school. We noticed serious illegalities in the impugned order dated 04.09.2018. It was issued after getting approval from the Nazim District Government Malakand. In the rules no such provision is available and posting/transfer is the prerogative of DEO (F) Malakand. Indulgence of District Nazim in such matters amounts to political interference, which has been held to be illegal and unlawful in numerous judgments of the superior courts followed by this Tribunal. Thus, the impugned transfer order is bereft of law/rules and cannot be sustained. It deserves to be struck down.

07. We are also cognizant of the fact that the appellant was not directly affected by the impugned order referred to above coupled with the fact, she enjoyed a stint at Sakhatok Khas in the past. However, being resident of Sakhatok Khas, she moved an application for transfer to GGPS, Sakhatok no.2 upon retirement of Mr. Taj ul Wara, PSHT. In addition to this the appellant being a widow deserve sympathetic treatment. No civil servant can claim a post of his or her choice and at a particular station. On the other hand private respondent no.4 remained posted at GGPS, Anargai for the last 29 years. Equity, fairness and justice demand that respondents should have given due consideration to this fact while issuing the impugned transfer order. We have also not been able to understand that instead of adjusting the private respondent at Sakhatok Khaas, she should have been accommodated in her Union Council. Justice/fair play demands to remit the case back to the respondents to pass fresh order strictly in accordance with law and rules and also giving due consideration ^{to} our observations.

08. Foregoing in view, the appeal is accepted, impugned order dated 04.09.2018 is set aside. The respondents are directed to pass fresh order on the said post strictly in accordance with law and rules. Parties are left to bear their own costs. File be consigned to the record room.



(MUHAMMAD HAMID MUGHAL)
Member



(AHMAD HASSAN)
Member

ANNOUNCED
20.12.2019

18.12.2019

Junior to counsel for the appellant and Mr. Riaz Paindakheil learned Assistant Advocate General alongwith Sher Azam ADEO present. Junior to counsel for the appellant seeks adjournment as senior counsel for the appellant is not in attendance. Adjourn. To come up for arguments on 20.12.2019 before D.B.


Member


Member

ORDER

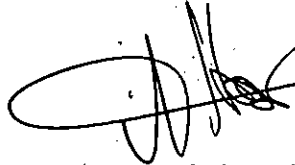
20.12.2019

Counsel for the appellant present. Mr. Muhammad Jan, DDA alongwith Mr. Sher Azam, ADEO for respondents present. Arguments heard and record perused.

Vide our detailed judgment of today of, this Tribunal placed on file, the appeal is accepted, impugned order dated 04.09.2018 is set aside. The respondents are directed to pass fresh order on the said *Post* strictly in accordance with law and rules. Parties are left to bear their own cost. File be consigned to the record room.

Announced:
20.12.2019


(Muhammad Hamid Mughal)
Member


(Ahmad Hassan)
Member

15.07.2019

Junior counsel for the appellant present. Mr. Riaz Ahmad Paindakheil, Assistant AG for official respondents No. 1 to 3 and counsel for private respondent No. 4 present. Junior counsel for the appellant requested for adjournment on the ground that learned senior counsel for the appellant is not available today. Adjourned to 25.09.2019 for arguments before D.B.



(HUSSAIN SHAH)
MEMBER


(M. AMIN KHAN KUNDI)
MEMBER

25.09.2019

Learned counsel for the appellant present. Mr. Zia Ullah learned Deputy District Attorney for the official respondents and junior to counsel for the private respondent No. 4 present. Junior to counsel for the private respondents seeks adjournment as senior counsel for the private respondents No.4 is not in attendance. Adjourned. To come up for arguments on 09.12.2019 before D.B


(Hussain Shah)
Member


(M. Amin Khan Kundi)
Member

09.12.2019

Lawyers are on strike on the call of Khyber Pakhtunkhwa Bar Council. Adjourn. To come up for further proceedings/arguments on 18.12.2019 before D.B. Sher Azam Khan Superintendent representative of the respondent department present.


Member


Member

11.04.2019

Clerk to counsel for the appellant and Mr. Muhammad Jan learned Deputy District Attorney present. Due to general strike of the bar, the case is adjourned. To come up for arguments on 26.04.2019 before D.B.


Member


Member

26.04.2019

~~Due to general strike of the bar, the case is adjourned. To come up for further proceedings on 09.05.2019 before D.B.~~

~~Member~~

~~Member~~

26.04.2019

Due to general strike of the bar, the case is adjourned. To come up for arguments on 09.05.2019 before D.B.

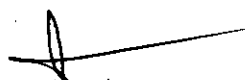

Member


Member

09.05.2019

Counsel for the appellant, Mr. Muhammad Jan, DDA alongwith Sher Azam, Asstt. for official respondents and husband of private respondent no. 4 present.

Learned counsel for the appellant has submitted rejoinder to the reply of respondents which is placed on record. To come up for arguments on 15.07.2019 before the D.B.


Member


Chairman

26-04-2019

Clerk to counsel for the appellant and Mr. Muhammad Jan learned Deputy District Attorney alongwith Haq Nawaz H.C present. Due to general strike of the bar, the case is adjourned. To come up for arguments on 26.04.2019 before D.B.

Member

Member

26.02.2019

Appellant in person and Mr. Kabirullah Khattak Addl; AG alongwith Mr. Shair Azam Superintendent for the respondents present. Representative of the respondents seek time to file written reply/comments. Granted. To come up for written reply/comments on 11.03.2019 before S.B


(Ahmed Hassan)
Member

11.03.2019

Learned counsel for the appellant present. Sher Azam Assistant representative of the official respondents present. Ajmal Khan Advocate submitted wakalat nama in favor of private respondent No.4. Written reply not submitted. Adjournment requested. Adjourn. To come up for written reply/comments on 25.03.2019 before S.B


Member

25.03.2019

Junior to counsel for the appellant present. Mr. Kabir Ullah Khattak learned Additional Advocate General alongwith Sher Azam Assistant for official respondents present. Learned counsel for private respondent No.4 also present. Sher Azam Assistant submitted reply on behalf of official respondents and learned counsel for private respondent No.4 also submitted reply. Adjourn. To come up for rejoinder/arguments on 11.04.2019 before D.B


Member

29.01.2019

Counsel for the appellant Naseem Begum present. Preliminary arguments heard. It was contended by learned counsel for the appellant that the appellant was promoted from the post of Senior Primary School Teacher to the post of Primary School Head Teacher vide order dated 21.02.2013 and on the basis of said promotion order she was transferred from Government Girls Primary School Sakhakot No. 2 to Government Girls Primary School Gulo Shah vide same order dated 21.02.2013. It was further contended that the appellant performing her duty in the said Government Girls Primary School Sakhakot so far. It was further contended that under sub-section 4 of section 3 of Khyber Pakhtunkhwa (Appointment, Deputation, Posting and Transfer of Teachers, Lecturers, Instructors and Doctors) Regulatory Act, 2011 Government shall, within a period not exceeding one year of the commencement of this Act, make arrangement for posting of all the primary school teachers appointed prior to coming into force of this Act, to the school of their respective Union Councils or adjacent Union Councils, as the case may be. It was further contended that on 1st October 2018 post of Primary School Head Teacher was to be vacated in Government Girls Primary School Sakhakot due to the retirement of the said Primary School Head Teacher therefore, the appellant submitted application to the District Education Officer Malakand Batkhela for transfer/adjustment to the said post because the appellant being senior was performing her duty in far flung area and the said school Sakhakot also fall within her Union Council. It was further contended that the competent authority instead of considering of aforesaid application has transferred private respondent No. 4 Mst. Hyadara, to the said Government Girls Primary School Sakhakot vide order dated 04.09.2018. It was further contended that the appellant was serving in Government Girls Primary School Gulo Shah since 2013 therefore, she was entitled for adjustment in the said school instead of private respondent No. 4 and the impugned order dated 04.09.2018 is liable to be rectified. It was further contended that the appellant also filed departmental appeal but the same was not responded hence, the present service appeal.

The contention raised by the learned counsel for the appellant needs consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days thereafter, notice be issued to the respondents for written reply/comments for 26.02.2019 before S.B. Learned counsel for the appellant also submitted application for suspension of impugned order. Notice of the same be also issued to the respondents for the date fixed.


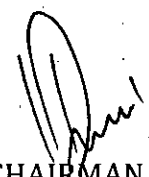
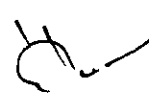
Appellant Deposited
Security & Process Fee


(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 1478/2018

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	12/12/2018	<p>The appeal of Mst. Naseem Begum presented today by Mr. Noor Muhammad Khattak Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 12/12/18</p>
2-	13/12/2018	<p>This case is entrusted to touring S. Bench for preliminary hearing to be put up there on <u>21/12/2018</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
24.12.2018		<p>Appellant absent. Learned counsel for the appellant absent. Adjourn. To come up for preliminary hearing on 29.01.2019 before S.B</p> <p style="text-align: right;"> Member</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 1478 /2018

NASEEM BEGUM

VS

EDUCATION DEPTT:

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APPELLANT

THROUGH:

**NOOR MOHAMMAD KHATTAK,
ADVOCATE**

Flat No. 3, Upper Floor,
Islamia Club Building,
Khyber Bazar, Peshawar
0345-9383141

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

APPEAL NO. 1478 /2018

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1748

Mst: Naseem Begum, PSHT (BPS-15),
GGPS Gulo Shah, Tehsil Dargai, District Malakand **Appellant**

Dated 12-12-2018

VERSUS

- 1- The Secretary E&SE Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The District Education Officer (F), District Malakand.
- 4- Mst: Hayadara, PSHT (BPS-15), GGPS Anar Tangi under transfer to GGPS Sakhakot No.2, Tehsil Dargai, District Malakand..... **Respondents**

**APPEAL UNDER SECTION-4 F THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974
AGAINST THE IMPUGNED ORDER DATED 4.9.2018
WHEREBY THE PRIVATE RESPONDENT WAS
TRANSFERRED TO GGPS NO.2 SAKHAKOT IN UTTER
VIOLATION OF SECTION-3 OF THE TRANSFER/POSTING
REGULATORY ACT, 2011 AND AGAINST NOT TAKING
ACTION ON THE DEPARTMENTAL APPEAL OF THE
APPELLANT WITHIN THE STATUTORY PERIOD OF
NINETY DAYS**

Filed to-day

[Signature]
Registrar
12/12/18

PRAYER: That on acceptance of this appeal the impugned order dated 4.9.2018 may kindly be set aside and the respondents may kindly be directed to transfer the appellant to GGPS No.2 Sakhakot in light of section-3 of the transfer/posting Regulatory Act, 2011. Any other remedy which this august Tribunal deems fit that may also be awarded in favour of the appellant.

R/SHEWETH:

ON FACTS:

- 1- That appellant was initially appointed as PST (BPS-12) in the respondent Department and during service she was promoted to the post of SPST (BPS-14) and then to the post of PSHT (BPS-15). That during her entire service career the appellant has served the respondent Department quite efficiently and up to the entire satisfaction of her superiors.

- 2- That lastly the appellant was transferred to GGPS Gulo Shah, Union Council Sakhakot Banda jaat vide order dated 21.2.2013. That in response to the said order dated 21.2.2013 the appellant submitted her charge report and started her duty. That it is pertinent to mention that GGPS Gulo Shah is situated/ falling in union Council of Sakhakot Bandajat while the appellant is the bonafide resident of Sakhakot Khaas but inspite of that the appellant is serving the respondent department at the said station for more than five years. Copies of the order and voter list of Sakhakot Khaas are attached as annexure **A and B.**
- 3- That due to retirement of one PSHT Mst: Taj Ul wara one post of PSHT had become vacant at GGPS No.2 Sakhakot Khaas. That appellant being the bonafide resident of Union Council Sakhakot Khaas submitted an application to the respondent No.3 for her transfer to the said station in light of section-3 of the transfer/posting Regulatory Act, 2011 of the Provincial Government of Khyber Pakhtunkhwa. Copies of the application and Act are attached as annexure **C and D.**
- 4- That vide impugned office order dated 4.9.2018 the respondent No.4 who is the bonafide resident of Union Council Gharhi Usmani Kheil has been transferred to GGPS Sakhakot No.2 inspite of the fact that appellant has already submitted application for her transfer to the said school in light of section -3 of the Act ibid. Copies of the impugned order and voter list of UC Gharhi Usmani Kheil are attached as annexure **E and F.**
- 5- That appellant feeling aggrieved from the impugned order dated 4.9.2018 submitted Departmental appeal before the respondent No.3 but of no avail. That during the pendency of Departmental appeal the appellant filed writ petition No. 1053/2018 before the Peshawar High Court Circuit Bench Dar-ul-Qaza at Swat which was decided on the directions to approach the proper forum vide judgment dated 19.11.2018. Copies of the Departmental appeal and judgment are attached as annexure **G & H.**
- 6- That the statutory period of ninety days of the Departmental appeal has been completed and no reply has been received so far. Hence the present appeal on the following grounds amongst the others.

GROUND:

- A- That the impugned order dated 4.9.2018 issued by the respondents is against the law, facts, norms of natural

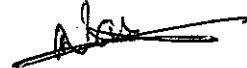
justice and materials on the record hence not tenable and liable to be set aside.

- B-** That, the inaction of the respondents by not transferring the appellant to her home Union Council i.e. Sakhakot Khaas is against the Law, policy, facts and norms of natural justice.
- C-** That the appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the constitution of Islamic Republic of Pakistan 1973.
- D-** That the impugned order is against the transfer/posting Regulatory Act, 2011, therefore not tenable and liable to be set aside.
- E-** That the impugned order dated 4.9.2018 is violative of clause ix of the transfer/posting policy, hence not tenable and liable to be set aside. Copy of the policy is attached as annexure **I.**
- F-** That, the treatment meted out to the appellant is a clear violation of the Fundamental Rights of the appellant.
- G-** That, the respondent Department acted in arbitrary and malafide manner by not transferring the appellant to her home station/union council.
- H-** That, the appellants has been discriminated by the respondent Department on the subject noted above and as such the respondents violated the Principle of Natural Justice.
- I-** That the appellant seeks permission to advance other grounds 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.

Dated: 08.12.2018

APPELLANT



NASEEM BEGUM

THROUGH:



NOOR MOHAMMAD KHATTAK



MUHAMMAD MAAZ MADNI
ADVOCATES

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. _____/2018

NASEEM BEGUM

V/S

EDUCATION DEPTT:

APPLICATION FOR SUSPENSION OF
OPERATION OF THE IMPUGNED ORDER DATED
04.09.2018 TILL THE DISPOSAL OF THE ABOVE
MENTIONED APPEAL

R/SHEWETH:

- 1- That the above mentioned appeal along with this application has been filed the appellant before this august service Tribunal in which no date has been fixed so far.
- 2- That appellant filed the above mentioned appeal against the impugned order dated 04.09.2018 whereby the private respondent No. 4 was transferred to GGPS No.2 Sakhakot in Utter violation of Section-3 of the Transfer/Posting Regulatory Act, 2011.
- 3- That all the three ingredients necessary for the stay is in favor of the appellant.
- 4- That the impugned order dated 04.09.2018 had been issued by the respondents in utter disregard of law and prevailing Rules.

It is therefore, most humbly prayed that on acceptance of this application the impugned order dated 04.09.2018 may very kindly be suspended till the disposal of the above mentioned appeal.

Dated: 11.12.2018

APPLICANT



NASEEM BEGUM


THROUGH:



NOOR MOHAMMAD KHATTAK



MUHAMMAD MAAZ MADNI
ADVOCATES

Better copy of page  A-5

OFFICE OF THE DISTRICT EDUCATION OFFICER (F), MALAKAND
AT BATKHELA

OFFICE ORDER:

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No. SO(B&A)/1-18/E&SE/2012 dated 12.7.2012 the following Senior Primary School Teacher PST-14 are hereby promoted to the post of Primary School Head Teacher PSHT-15 (8500-700-29500) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government in Teaching Cadre on the terms and condition given below with immediate effect and further posted in the schools noted against each:-

S. No.	Sr. No	Name	Father Name	Present Place of Posting	School where as primary School H/Teacher	Remarks
1	2	Hamida Begum	Faqir Khan	GGPS Batkhela No.1	GGPS Batkhela 1	Already occupied post
22.	57A	Naseem Begum	Raza Khan	GGPS S/Kot No.2	GGPS Gulo Shah	Vice Nizakat

ATTESTED



ATTESTED



OFFICE OF THE DISTRICT EDUCATION OFFICER (F), MALAKAND AT BATHHELA.

183-57A-5

OFFICE ORDER

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No. SO(B&A)/1-18/E&SE/2012 dated 11-7-2012 the following Senior Primary School Teachers PST-B-14 are hereby promoted to the post of Primary School Headteachers PSHT-B-15 (BS00-700-19500) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with immediate effect and further posted in the schools noted against each:

S.No.	Sr.No	Name	Father's Name	Present Place of Posting	School Where posted as P.S. School H/Teacher	Remarks
1	2	HAMIDA BEGUM	FAQIR KHAN	GGPS BATHHELA NO 1	GGPS BATHHELA-1	Already occupied post
2	7	RAZIA BEGUM	MUKHTIAR MOHAMMAD	GGPS MAIZARA BATHHELA	GGPS MAIZARA BATHHELA	Already occupied post
3	14	Zuhra Zareen	Muhammad Zameen	GGPS Amir Kalli	GGPS DARAKAT SHAH KORONA	Vice Nisar Begum
4	15A	Janila Jehanzeb	Johan Zeb	GGPS Zangal Pata	GGPS ZANGAL PATA	Already occupied post
5	18	TASLEEM BIBI	IHSANUR RAHEEM	GGPS DHERI	GGPS DHERI	Already occupied post
6	20	Zubsida Bibi	Abdulwahid	GGPS Yousaf Abadi	GGPS Yousaf Abad	Already occupied post
7	21	TASLEEM BEGUM	DERA WADAN	GGPS MAIZARA THANA	GGPS MAIZARA THANA	Already occupied post
8	24	SHAHI SULTAN	FEROZ SAID	GGPS AMIRABAD	GGPS Kallio Bk	Non Teaching
9	25	KULSOOM BEGUM	DERA WADAN	GGPS NALL NO 1	GGPS NALL NO. 1	Already occupied post
10	30	Zarshoo Begum	Sakhi Sawar	GGPS Rabar Shah	GGPS Rabar Shah	Already occupied post
11	31	ZAKIA BEGUM	ISSA KHAN	MAIZARA BATHHELA	GGPS Gulings	Vice Nasira
12	33	Masoom Zahra	Fazal Wahid	GGPS Mohra	GGPS Mohra	Already occupied post
13	33	SAEEDA BEGUM	MOHAMMAD KHAN	GGPS SUNYAR	GGPS Ganero, Sharif	Already occupied post
14	34	Janila Begum	Mehror Khan	GGPS Paj Dgoand	GGPS Paj Dgoand	Already occupied post
15	35	SARYAT ARA	ABDUL SATTAR	GGPS JALALA	GGPS JALALA	Already occupied post
16	36	NASIM AKHTAR	BAKHTIAR KHAN	GGPS Sidi Khap	GGPS Bugh Gara	Vice Nasim Akhtar
17	43	Naheed Begum	Haq Nawaz	GGPS DARGAI	GGPS DARGAI	Already occupied post
18	44	Zehal Begum	Juma Khan	GGPS Prangal	GGPS KHAOU	VICE SHAGUFTA NISAR
19	53	Rasheeda Bibi	Khan Gul	GGPS Badrajo	GGPS Badrajo	Already occupied post
20	54	Yasmeen Begum	Nozar Hussain	GGPS Sakhal Kot No1	GGPS Sakhal Kot No1	Already occupied post
21	55	Asmat Ara	Muhabat Khan	GGPS HISHAH NO1	GGPS HISHAH NO1	Already occupied post
22	57A	Nasoom Begum	Raz Akhbar	GGPS Sakhal No2	GGPS GULO SHAH	VICE MIZKAT
23	58A	Jouhari Begum	Aqal marid	GGPS dafni	GGPS MUSTAHAD KORONA	VICE FARRUKH
24	59A	Sherin Baha	Noor Reh	GGPS wafir Abad	GGPS wafir Abad	Already occupied post
25	62A	Avisha Bibi	Said Mohammed	GGPS Gulinkot No1	GGPS MALAK ABAD SHINGRAI	VICE SHAHIDA RAHIM
26	62	Nizakat	Khan Badshah	GGPS H. Mohd. Korona	GGPS H. Mohd. Korona	Already occupied post
27	64	Shaguha Khan	MIAN KARIM ULLAH	GGPS ARBAIT ABAD	GGPS ARBAIT ABAD	Already occupied post
28	65	TAWHEED BEGUM	SARDAR ACH	GGPS JALALA	GGPS PIR MUHAMMAD BANDA	A.V.P
29	67	ROBINA SHAHEEN	AMANATULLAH	GGPS THANA NO 1	GGPS THANA NO	Already occupied post
30	69	Musan Bano	Abdul Wahid	GGPS Dargai	GGPS Dargai P.HOUSE	VICE ZAHIDA
31	71	JARILA BEGUM	GHUAM AMBAR	GGPS KHAR KOTKAI	GGPS KHAR KOTKAI	Already occupied post
32	73	Hurnat Bibi	Azeem Khan	GGPS SHINGRAI	GGPS Ashkal	Already occupied post
33	74	Shah Raz	Umar Khan	GGPS SHINGRAI	GGPS BAJA BANDA	VICE SURAYA
34	75	KISHWAR SULTAN	MOHAMMAD YAKUB	GGPS MALAK ABAD	GGPS Tolakan No.2	Vice Aza Naz
35	76	Nihayat Begum	Ruslan Khan	GGPS NALL NO.1	GGPS NALL NO.1	Already occupied post
36	77	Nasreen begum	Abdul Wahid	GGPS Sakhal Dheri	GGPS Khani Dheri	Already occupied post
37	78	RASHIDA BEGUM	SHER KHAN	GGPS MALAKAND	GGPS MALAKAND	Already occupied post
38	82	NAHEED BEGUM	FAZL KHAN	GGPS CO THANA	GGPS CO THANA	Already occupied post

upon her promotion to PSHT

ATTESTED

Y/c Salehullah Bandajal
21-2-2013

ATT

شماراتی بلاک کوڈ

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B - (6)

حتمی انتخابی فہرست

انتخابی علاقے کا نام سخاکوٹ خاص

موضع / دیہہ / شہر سخاکوٹ خاص

پٹوار حلقہ / تپے دار سرکل کا نام سخاکوٹ خاص یوسی

تحصیل / تعلقہ سہ رائیڑی

ضلع مالاکنڈ پرووینس ایریا

یونین کونسل

ووٹروں کی تفصیل	
290	مرد
254	خواتین
544	کل ووٹر



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ATTESTED

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دستخط رجسٹریشن آفیسر

پرستش کی تاریخ: 20 مئی 2018

کتاب نمبر: 8/430



7

عمر	قومی شناختی کارڈ نمبر	والد اور شہر کا نام	نمبر	عنوان نمبر
54	15401-7029281-6	زوجہ محمد یعقوب	15	ارشاد بیگم
28	15401-5879669-8	زوجہ محمد یعقوب خان	15	آصفین
45	15401-0685987-6	زوجہ طارق کلیم	16	ملی بیگم
32	15401-8514709-8	زوجہ محمد طاہر	17	بینہ گل
79	15401-6543816-4	زوجہ ایشہ الدین	18	نازک
42	15401-4648711-0	زوجہ ابرارین	18	منار بیگم
55	15401-8740738-2	زوجہ صاحب شاہ	19	نجم بیگم
51	15402-1362037-8	زوجہ باقی شاہ	19	مہر انبی بی
43	15401-7513342-2	زوجہ باقی شاہ	19	کاب زوی
26	15401-6306185-2	زوجہ آصف شاہ	19	روشنا
42	15401-0684011-8	زوجہ سید نور شاہ	20	علیہ نور
44	15401-0676080-0	زوجہ سید قیاس حسین	21	مریم بی بی
63	15401-3090252-6	زوجہ محمد امین	22	زہرا بی
34	15401-6905016-2	زوجہ محمد امین	22	ساجدہ
30	15401-5100818-0	زوجہ نور اللہ امین	22	شہان بیگم
27	15401-9080022-4	زوجہ اما علی شاہ	22	نہال بی بی
72	15401-0681499-6	زوجہ حسن گل	23	سہیل
45	15401-0681498-8	زوجہ حسن گل	23	توحید
43	15401-6263707-6	زوجہ گل بی	24	فوزیہ
66	15401-2585832-4	زوجہ نازان	25	سرور بی بی
53	61101-0768232-6	زوجہ ونی رحمان	25	فہمیدہ
34	15401-7071421-6	زوجہ قیصر علی	25	شامین بی بی
33	15401-2291684-0	زوجہ فرمان علی	25	سینہ بی بی
24	17102-3710651-4	زوجہ اسحاق	25	خدیجہ ناز
60	15401-0684627-4	زوجہ محمد عمر	26	رحمہ بی بی
34	15401-0241744-0	زوجہ یحییٰ روان	26	پروین بی بی
33	15401-7798977-8	زوجہ نوشیر وان	26	بہس بی بی
27	15401-6520562-6	زوجہ لیاقت علی	26	بی بی زینب

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بہ بیگم یا
پروین بیگم یا
بہ بیگم یا

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کتاب نمبر: 8/430، مالا کنڈیہ و بیگلا-1، 013010108 صفحہ نمبر: 15/22

پر شٹنگ کی تاریخ: 20 مئی 2018ء

درجہ پیش آف

ATTESTED

بخدمت جناب ڈائریکٹر ایجوکیشن آفیسر (زنانہ) ملائڈ ایٹ ٹیچر
عنوان: درخواست برائے تبادلہ GGPS گلو شاہ سے GGPS سٹاکوٹ بچے

جناب عالیہ!
موردیہ گزارش کی جاتی ہے کہ سائلہ بحیثیت PSHT گورنمنٹ گریڈ
پرائمری سکول گلو شاہ میں 21-02-2013 سے تعینات ہیں۔ اب سائلہ
کی گھر کے قریب GGPS سٹاکوٹ بچے میں تاج پوری میں PSHT کی
ریٹائرمنٹ کی صورت میں یکم اکتوبر 2018 سے ویکنی (vacancy) پیدا
ہونے والی ہے۔ چونکہ سائلہ بیوہ ہے اس کو دور دراز اسٹیشن پر ڈیوٹی انجام
دینے میں بے تحاشہ مشکلات کا سامنا کرنا پڑتا ہے لہذا جناب عالیہ سے
بہمدردانہ اپیل ہے کہ سائلہ ڈائریکٹر ایجوکیشن آفیسر گلو شاہ سے GGPS سٹاکوٹ بچے
کرنے کی احکامات صادر فرمائیں تو حد درجے احسان مندی ہوگی۔

درخواست گزار
نسیم بیگم
PSHT

GOVERNMENT
DARGAI

GGPS No 1262 Dated: 18/8/2018
Forwarded to DEO(E) Dargai for favourable
Comment please.

SDEO (F)
DARGAI

ATTESTED

[Signature]

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THE KHYBER PAKHTUNKHWA (APPOINTMENT, DEPUTATION,
POSTING AND TRANSFER OF TEACHERS, LECTURERS,
INSTRUCTORS AND DOCTORS) REGULATORY ACT, 2011.

D-9

(KHYBER PAKHTUNKHWA ACT NO. XII OF 2011)

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PREAMBLE

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2. Definitions.
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4. Appointment of doctors, lecturers, instructors, subject specialists and teachers on adhoc basis.
5. Initial posting.
6. Deputation of Doctors.
7. Postgraduate Medical Education
8. Provisions relating to doctors apply to lecturers and instructors.
9. Act to over-ride other laws.
10. Jurisdiction barred.
11. Removal of difficulties.
12. Power to make rules.

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THE KHYBER PAKHTUNKHWA (APPOINTMENT, DEPUTATION,
POSTING AND TRANSFER OF TEACHERS, LECTURERS,
INSTRUCTORS AND DOCTORS) REGULATORY ACT, 2011.

(10)

(KHYBER PAKHTUNKHWA ACT NO. XII OF 2011)

[first published after having received the assent of the Governor of
the Khyber Pakhtunkhwa in the Gazette of Khyber Pakhtunkhwa
(Extraordinary), dated the 12th May, 2011].

AN
ACT

*to regulate by law appointments, postings and transfers of teachers serving in
primary, middle, secondary and higher secondary schools, lecturers in colleges and
instructors in technical institutions and doctors in health facilities.*

Preamble.---WHEREAS it is expedient to regulate by law appointments,
postings and transfers at local level, of teachers serving in primary, middle,
secondary and higher secondary schools, lecturers in colleges and instructors in
technical institutions and doctors in health facilities and to ensure the availability of
teachers in schools, lecturers in colleges and instructors in technical institutions and
the doctors in health facilities, and to regulate deputation of doctors abroad, and to
provide for matters connected therewith or ancillary thereto;

It is hereby enacted as follows:

1. **Short title, application and commencement.**---(1) This Act may be called
the Khyber Pakhtunkhwa (Appointment, Deputation, Posting and Transfer of
Teachers, Lecturers, Instructors and Doctors) Regulatory Act, 2011.

(2) It shall apply to teachers serving in primary, middle, secondary and
higher secondary schools, lecturers in colleges as well as commerce colleges and
instructors serving in technical institutions and doctors serving in the health facilities
in the Province of the Khyber Pakhtunkhwa.

(3) It shall come into force at once.

2. **Definitions.**---(1) In this Act, unless the context otherwise requires, the
following expressions shall have the meanings hereby respectively assigned to them
that is to say,-

(a) "Commission" means the Khyber Pakhtunkhwa Public
Service Commission;

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- (11)
- (b) "doctor" means a doctor serving in the health facility;
 - (c) "Government" means the Government of the Khyber Pakhtunkhwa;
 - (d) "health facilities" mean all health facilities established and managed by the Government to provide medical facilities to general public;
 - (e) "lecturer" and "instructor" respectively means a lecturer or an instructor serving in a Technical Institution as the case may be;
 - (f) "prescribed" means prescribed by rules made under this Act;
 - (g) "rules" mean the rules made under this Act;
 - (h) "school" means school in the public sector including primary, middle, secondary school, higher secondary school or an institution of equivalent level imparting education through any system or medium of instruction in the public sector;
 - (i) "teacher" means a teacher of primary, middle, secondary or higher secondary school; and
 - (j) "technical institution" means and includes a Commerce College or Government College of Management Sciences or Technical Institute or Technical and Vocational Training Center or Skill Development Center in the public sector imparting technical education to students leading to the award of a degree or a diploma or a certificate.

(2) Words and phrases used in this Act, but not defined, shall have the same meanings as respectively assigned to them under the relevant federal law or provincial law or any other statutory order or rules for the time being in force.

3. **Appointment, posting and transfer of primary school teachers.**---(1) The vacancy of primary school teacher shall be filled in from the candidates belonging to the Union Council of their permanent residence mentioned in their Computerized National Identity Card and domicile, on merit and if no eligible candidate in that Union Council is available where the school is situate, such appointment shall be made on merit from amongst eligible candidates belonging to the adjacent Union Councils:

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(10) (12)

Provided that on availability of a vacancy, a primary school teacher, appointed from adjacent Union Council, as referred to in this sub-section, shall be transferred against a vacant post in a school of the Union Council of his residence within a period of fifteen days.

(2) Upon marriage, the primary school teacher on request may be transferred to the school in the Union Council, where his spouse, ordinarily resides, subject to the availability of vacancy.

(3) The primary school teacher shall be transferred to other school within the Union Council on completion of tenure as may be prescribed subject to the policy of rationalization for maintaining certain student teachers ratio, if any.

✓ (4) Government shall, within a period not exceeding one year of the commencement of this Act, make arrangement for posting of all the primary school teachers appointed prior to coming into force of this Act, to the schools of their respective Union Councils or adjacent Union Councils, as the case may be.

4. Appointment of doctors, lecturers, instructors, subject specialists and teachers on adhoc basis.---(1) Government may, through the competent authorities make adhoc appointment on merit against the vacant posts of doctors, lecturers, instructors, subject specialists and teachers, falling within the purview of Commission, in a district concerned from the domicile holders of that district for a period of one year or till the arrival of recommendees of Commission, whichever is earlier after fulfilling the pre-requisites of giving wide publicity in the press. On assumption of charge of post by recommendee of the Commission, the services of such ad hoc appointee shall stand automatically terminated:

Provided that if no suitable and eligible candidate is available in the district concerned for appointment, then the candidates belonging to the neighbouring districts shall be considered for appointment in the order of their merit.

(2) Save as the appointment made under proviso of this section, "ad hoc appointee" shall serve in the district of his domicile.

(3) The post of a doctor, lecturer, instructor, subject specialist or secondary school teacher who proceeds on training or long leave may be treated as vacant post for the purpose of contract or contingent appointment till the return of such employee from training or long leave and assumption of charge of the post:

Provided that the period of such training or long leave shall not be less than one year and no appointment on contract or contingent shall be made on the post which may fall vacant for a period less than one year.

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5. Initial posting.---(1) The doctors, the teachers and the lecturers and instructors upon their appointment shall be first posted in the periphery of the zone against whose quota they have been recruited, and they shall not be transferred for a period of at least three years.

(2) Upon expiry of the tenure as referred to in sub-section (1), transfer shall be made only upon the availability of substitute.

6. Deputation of Doctors.---(1) Government may allow deputation abroad for all categories of doctors only once in their entire service, for a period not exceeding three years.

(2) Deputation to "Foreign Service" within Pakistan shall be permissible only in respect of medical officers for a period not exceeding three years:

Provided that no further extension, on expiry of agreed tenure shall be given to the doctors who are already on deputation abroad or within Pakistan.

7. Postgraduate Medical Education.---(1) The Health Department, on the basis of objective need assessment and analysis, shall determine the intake number of Trainee Medical Officers (TMOs) in Postgraduate Medical Institute (PGMI) and Junior Registrars in Tertiary Care Hospitals every year. This stipulated number shall not exceed in any case.

(2) Any doctor selected or permitted for postgraduate medical training shall be treated on leave without pay and may be entitled only for stipend fixed by Government from time to time for such training.

(3) A doctor selected or permitted for postgraduate medical training shall provide surety bond prescribed by Government ensuring that upon completion of his studies for which he was initially selected, shall compulsorily serve for three years in the district of his domicile and in case of non-availability of a post in the district of domicile, he shall serve for three years in the rural area.

(4) For the purpose of sub-section (3), the doctor shall also provide guarantee of two government officers.

(5) In case of violation of sub-section (3), Government shall serve one month notice upon the doctor for resumption of duty, failing which the amount shall be recovered from him or from the guarantor, as the case may be.

8. Provisions relating to doctors apply to lecturers and instructors.---The provisions relating to doctors in section 7 of this Act shall *mutatis mutandis* apply to lecturers and instructors.

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9. Act to over-ride other laws.---The provisions of this Act shall have effect notwithstanding anything contained in any other law for the time being in force.

10. Jurisdiction barred.---Save as provided under the Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973), the Khyber Pakhtunkhwa Civil Servants (Appeal) Rules, 1986 and the Khyber Pakhtunkhwa Service Tribunal Act, 1974 (Khyber Pakhtunkhwa Act No. I of 1974), no order made or proceedings undertaken under this Act, or the rules made there under or any officer authorized by it shall be called into question in any Court, and no injunction shall be granted by any Court in respect of any decision made, or proceedings taken in pursuance or by any power conferred by or under this Act or the rules.

11. Removal of difficulties.---Government may, by order, provide for the removal of any difficulty which may arise in giving effect to the provisions of this Act.

12. Power to make rules.---Government may make rules for carrying out the purposes of this Act.

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E-15

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MALAKAND AT BATHKHELA

OFFICE ORDER/

Consequent upon recommendation of the placement Committee and approval of the Nazim District Government Malakand for Transfers of the following Primary School Teacher (PSHT/SPSTs/PSTs) against the vacant posts are hereby ordered to the schools noted against each their names on their own pay and scale in the interest of public service from the date of their taking over charge:

S.No	Name and Designation	From	To	Remarks
1	Lubna Kiramat PST	GGPS No.2, Khanaori	GGPS Dhad Dheri	A.V. Post
2	Salma Khurshed-SPST	GGPS CC Thana	GGPS No.1, Thana	A.V. Post
3	Dilshad Begum PST	GGPS Halbat Gram	GGPS CC Thana	A.V. Post
4	Sadaf Bibi PST	GGPS Aspuri (Total)	GGPS Bagh Kalli (Total)	Vice S.No.6
5	Shahen Begum PST	GGPS Bagh Kalli (Total)	GGPS Serai (Total)	Vice S.No.8
6	Saima Ashraf PST	GGPS Naranji (Total)	GGPS Aspuri	Vice S.No.5
7	Asla B'li PST	GGPS Serai (Total)	GGPS Naranji (Total)	Vice S.No.7
8	Saima Bibi PST	GGPS Sargara (Agra)	GGCMS Qalijara	A.V. Post
9	Sadia Wahid PST	GGPS Buzdara Bala	GGPS No.1, Palai	A.V.P.
10	Sarwat Ara PST	GGPS Maizara Thana	GGPS No.1, Thana	A.V.P.
11	Uzma PST	GGPS Gul Muqam	GGPS Dargai	A.V.P.
12	Hayadara PSHT	GGPS Anar Tangal	GGPS No.2, Sakhat	W.e. from 1.10.2018

was the retirement 30/9/2018 dt.

Retrospective date.

Note:- No TA/DA is allowed. Charge report should be submitted to all concerned.

UC Ghani Usmani
Chief

(SADIA ILYAS)
DISTRICT EDUCATION OFFICER (FEMALE)
MALAKAND AT BATHKHELA.

Endst: No. 3707-16 / F.No.02/Transfer PST(F)/2018/Dated the 04/09/2018

Copy forwarded for information and necessary action to viz:-

1. The Director E&SE Department Khyber Pakhtunkhwa, Peshawar.
2. The Nazim District Government Malakand.
3. The Deputy Commissioner Malakand.
4. The District Monitoring Officer Malakand.
5. The Sub Divisional Education Officer (Female) Swat Ranizai at Bathkela.
6. The Sub Divisional Education Officer (Female) Sama Ranizai at Dargai.
7. The District Accounts Officer Malakand.

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شماراتی بلاک کوڈ

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حتمی انتخابی فہرست

علاقے کا نام گورنمنٹی خیل

پٹوار حلقہ / تپے دار سرکل کا نام گھڑی عثمانی خیل یونین کونسل

دیہہ / شہر گورنمنٹی خیل

ضلع مالاکنڈ پرووینس ایبٹ آباد یونین کونسل

تعلقہ سمہ رائی

ووٹروں کی تفصیل	
507	مرد
433	خواتین
940	کل ووٹر



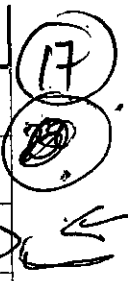
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ATTESIED

دستخط رجسٹریشن آفیسر

پر ٹائٹ کی تاریخ: 20 مئی 2018

نمبر: 117/430

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ردیف	توضیحات	شماره سند	تاریخ سند	نام و نام خانوادگی	شماره سند	تاریخ سند
29	محلہ کوڑھہ کراچی خانہ خلیل تقسیم درگئی سند 15401-1364365-6	15401-1364365-6	2006-08-15	زوجہ احمد بیگم	عظمی بی بی	89
30	محلہ خلیل پور ڈاک خانہ کراچی خانہ خلیل تقسیم درگئی سند 15401-8998984-8	15401-8998984-8	2006-08-15	زوجہ سید شیرین	نور تاج	90
30	محلہ خلیل پور ڈاک خانہ کراچی خانہ خلیل تقسیم درگئی سند 15401-0810161-6	15401-0810161-6	2006-08-15	زوجہ بارون رشید	بی بی حیا وارہ	90
31	ڈاک خانہ کراچی خانہ خلیل تقسیم درگئی سند 15401-4770793-4	15401-4770793-4	2006-08-15	زوجہ جمشید احمد	روبی جانی	90
32	محلہ کھانہ خلیل پور کراچی خانہ خلیل تقسیم درگئی سند 15401-3942434-4	15401-3942434-4	2006-08-15	زوجہ فخر الامام	لوشین بی بی	90
33	محلہ خلیل پور ڈاک خانہ کراچی خانہ خلیل تقسیم درگئی سند 15401-7032491-3	15401-7032491-3	2006-08-15	زوجہ یار محمد	مدد بقیہ بارون	90
33	محلہ کوڑھہ کراچی خانہ خلیل تقسیم درگئی سند 15401-7187165-4	15401-7187165-4	2006-08-15	زوجہ افضل کریم	ساجد زری	91
34	ڈاک خانہ کراچی خانہ خلیل تقسیم درگئی سند 15401-6499763-2	15401-6499763-2	2006-08-15	زوجہ اسمان رحیمہ	ارمنہ	91
35	محلہ کوڑھہ کراچی خانہ خلیل تقسیم درگئی سند 15401-4855468-2	15401-4855468-2	2006-08-15	زوجہ افضل کریم	سہرت بی بی	91
36	کراچی خانہ خلیل تقسیم درگئی سند 15402-1360861-4	15402-1360861-4	2006-08-15	زوجہ بنتی روان	اکرم بیان	92
37	کراچی خانہ خلیل تقسیم درگئی سند 15401-5890064-2	15401-5890064-2	2006-08-15	زوجہ بنتی روان	بالہوا	92
38	سائیکل کراچی خانہ خلیل تقسیم درگئی سند 16102-3885368-8	16102-3885368-8	2006-08-15	زوجہ محمد نسیم	سہما بیگم	92
39	بریل کراچی خانہ خلیل تقسیم درگئی سند 15401-6155893-8	15401-6155893-8	2006-08-15	زوجہ محمد قریش	شازیہ	93
40	محلہ کوڑھہ کراچی خانہ خلیل تقسیم درگئی سند 15401-3822383-6	15401-3822383-6	2006-08-15	زوجہ میر اکبر خان	سلطان زری	95
41	محلہ کوڑھہ ڈاک خانہ کراچی خانہ خلیل تقسیم درگئی سند 17101-6108237-4	17101-6108237-4	2006-08-15	زوجہ بیگم خان	گفتہ بیگم	95
42	گدا خانہ خلیل تقسیم درگئی سند 15402-1362754-4	15402-1362754-4	2006-08-15	زوجہ عبد الوہاب	بی بی رمضان	96
43	افزون ڈاک خانہ کراچی خانہ خلیل تقسیم درگئی سند 15401-0685218-4	15401-0685218-4	2006-08-15	زوجہ فضل عبادی	شمس الدینی	96
44	افزون ڈاک خانہ کراچی خانہ خلیل تقسیم درگئی سند 15401-0676699-6	15401-0676699-6	2006-08-15	زوجہ شمس الوہاب	نسرین بیگم	96
45	افزون ڈاک خانہ کراچی خانہ خلیل تقسیم درگئی سند 15401-0676702-6	15401-0676702-6	2006-08-15	زوجہ حضرت وہاب	شاہدہ ناز	96
46	افزون ڈاک خانہ کراچی خانہ خلیل تقسیم درگئی سند 15401-3102193-2	15401-3102193-2	2006-08-15	زوجہ عزیز الوہاب	محمودہ تبسم	96
47	افزون ڈاک خانہ کراچی خانہ خلیل تقسیم درگئی سند 15401-8797547-8	15401-8797547-8	2006-08-15	زوجہ سنجیدہ	روزینہ تبسم	96
48	محلہ افزون ڈاک خانہ کراچی خانہ خلیل تقسیم درگئی سند 15401-7887288-6	15401-7887288-6	2006-08-15	زوجہ لاشف احمد	بیلا تبسم	96
49	افزون ڈاک خانہ کراچی خانہ خلیل تقسیم درگئی سند 15401-5052354-8	15401-5052354-8	2006-08-15	زوجہ امرا اللہ	سارہ وہاب	96
50	کراچی خانہ خلیل تقسیم درگئی سند 15401-9308165-6	15401-9308165-6	2006-08-15	زوجہ امیر امیر شاہ	نور شہیدہ	97
51	ڈاک خانہ کراچی خانہ خلیل تقسیم درگئی سند 15401-6963464-2	15401-6963464-2	2006-08-15	زوجہ رب اواز	تاج الحرم	98
52	محلہ کوڑھہ ڈاک خانہ کراچی خانہ خلیل تقسیم درگئی سند 15401-6351734-6	15401-6351734-6	2006-08-15	زوجہ محمد اقبال	جنت حرم	98
53	کوڑھہ کراچی خانہ خلیل تقسیم درگئی سند 15401-7175941-6	15401-7175941-6	2006-08-15	زوجہ نسیم اقبال	امیرہ	98
54	محلہ کوڑھہ کراچی خانہ خلیل تقسیم درگئی سند 15401-0742752-2	15401-0742752-2	2006-08-15	زوجہ فقور خان	حسن بی بی	99

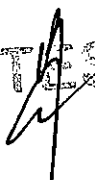
ATTESTED



کتاب نمبر: 117/430 مالا کٹریو سیکٹار 013070105 صفحہ نمبر: 30/36

پر ملک کی تاریخ 20 اگست 2008ء

ATTESTED



خدمت جناب ڈی۔ ای۔ او (اور زمانہ ملائندہ ڈیپٹ منجملہ)
ایپل برخلاف PST ٹرانسفر

جناب عالیہ! خودیانا گزارش کی جاتی ہے کہ حالیہ PST
ٹرانسفر آرڈر میں انصاف کے تقاضوں کو یکسر نظر انداز
کیا گیا ہے اور منظور نظر افراد کو نوازا گیا ہے

(۱) یہ کہ حیدرآباد PSHT کو انارنگے GGS میں ۷۵
پھیڑ سٹول سے تبدیل کروا کر GGS سٹاکوٹے

لایا گیا ہے (۲) یہ کہ سیم سٹیم PSHT جو کہ GGS گلوشاہ میں

۲۱-۰۲-۲۰۱۳ سے خدمات انجام دی رہی ہیں، اسکو نظر
انداز کیا گیا ہے یاد چود اسکے کہ مذکورہ سٹول کے

قریب ہیں۔ درخواست دہندہ بیوہ ہے اور ریٹائرمنٹ کے قریب
(۳)

ہیں۔ لہذا مندر بالا وجوہات کی بناء پر درخواست

دہندہ کو GGS سٹاکوٹے ٹرانسفر کروائیں
تو حد درجہ احسان مندی ہوگی۔

الحاضرہ نسیم بیگم PSHT

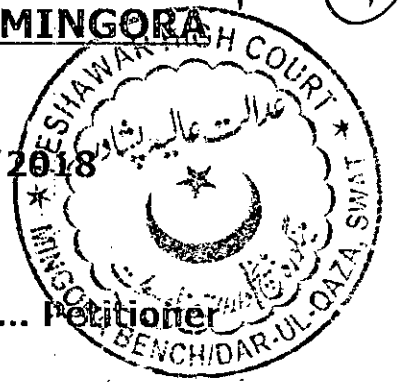
GGS گلوشاہ سٹاکوٹے

HEAD MISTRESS
G.G.S GULO SHAH
DISTRICT HEAD OFFICE
7/9/2018

ATTESTED
ATTESTED

BEFORE THE PESHAWAR HIGH COURT, MINGORA
BENCH DAR UL QAZA SWAT

WRIT PETITION NO. 1053-M/2018



Mst: Naseem Begum, PSHT (BPS-15),
GGPS Gulo Shah, Tehsil Dargai, District Malakand **Petitioner**

VERSUS

- 1- The Government of Khyber Pakhtunkhwa through Secretary E&SE Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The District Education Officer (F), District Malakand.
- 4- Mst: Hayadara, PSHT (BPS-15), GGPS Anar Tangi under transfer to GGPS Sakhakot No.2, Tehsil Dargai, District Malakand..... **Respondents**

WRIT PETITION UNDER ARTICLE 199 OF THE
CONSTITUTION OF ISLAMIC REPUBLIC OF
PAKISTAN 1973 AS AMENDED UP TO DATE

R/SHEWETH:
ON FACTS:

- 1- That petitioner is a bonafide, peaceful & Law abiding citizen of Pakistan and is the employee of (E&SE) Department. Copy of CNIC is attached as annexure **A.**
- 2- That petitioner was initially appointed as PST (BPS-12) in the respondent Department and during service she was promoted to the post of SPST 9BPS-14) and then to the post of PSHT (BPS-15). That during her entire service career the petitioner has served the respondent Department quite efficiently and up to the entire satisfaction of her superiors.
- 3- That lastly the petitioner was transferred to GGPS Gulo Shah, Union Council Sakhakot Banda jaat vide order dated 21.2.2013. That in response to the said order dated 21.2.2013 the appellant submitted her charge report and started her duty. That it is pertinent to mention that GGPS Gulo Shah is situated/ falling in union Council of Sakhakot Bandajat while the petitioner is the bonafide resident of Sakhakot Khaas but inspite of that the petitioner is serving the respondent department at the said station for more than five years. Copies of the

FILED TODAY
23 OCT 2018

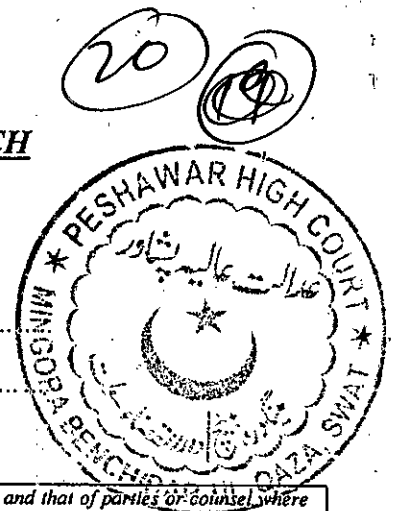
Administrative Registrar

PESHAWAR HIGH COURT, MINGORA BENCH
(DAR-UL-QAZA), SWAT

FORM OF ORDER SHEET

Court of

Case No..... of.....



Serial No. of order or proceeding	Date of Order or Proceedings	Order or other Proceedings with Signature of Judge or Magistrate and that of parties or counsel where necessary.
1	2	3
	19.11.2018	<p><u>W.P. No. 1053-M/2018</u></p> <p>Present: Mr. Noor Mohammad Khattak, Advocate, for the petitioner.</p> <p align="center">***</p> <p><u>SYED ARSHAD ALI, J:-</u> Through the instant writ petition, the petitioner seeks constitutional jurisdiction of this Court with the following prayer:-</p> <p align="center"><i>“ It is therefore, most humbly prayed that on acceptance of this writ petition the action of the respondent No. 3 by issuing the impugned order dated 04.9.2018 to the extent of private respondent No. 4 may be declared as illegal, unconstitutional and ineffective upon the rights of the petitioner. That the respondent No. 3 may please be directed in light of section-3 of the transfer/posting Regulatory Act, 2011 to transfer the petitioner to GGPS Sakhakot No. 2, Union Council Sakhkot Khaas instead of private respondent No. 4. Any other remedy which this august Court deems fit that may also be awarded in favour of the petitioner.”</i></p>

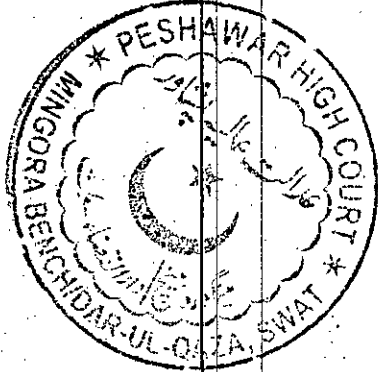
Nawab (D.B.) Hon'ble Mr. Justice Muhammad Ghazanfar Khan
 Hon'ble Mr. Justice Syed Arshad Ali



2. The learned counsel appearing on behalf of the petitioner has argued that the petitioner had filed an application to the District Education Officer (F), District Malakand for her transfer to GGPS Sakhakot No. 2 on the eve of retirement of the then incumbent teacher Mst. Taj-ul-Wara w.e.f. 01.10.2018 in view of section-3 of the Khyber Pakhtunkhwa (Appointment, Deputation, Posting and Transfer of Teachers, Lecturers, Instructors and Doctors) Regulatory Act, 2011. However, instead of honoring request of the petitioner, the respondent No. 3 has transferred the respondent No. 4 against the said post, which is illegal.

3. However, when the learned counsel appearing on behalf of the petitioner was confronted with the legal proposition that the matter relates to the transfer of the petitioner and in view of the express bar contained under Article 212 of the Constitution of Islamic Republic of Pakistan, 1973, whether this Court can entertain this petition. His reply was that since the rights of the petitioner are covered under section-3 of the Act *ibid*, therefore, this Court has the jurisdiction to intervene in the matter. However, we cannot agree with the said submission of the learned counsel for the petitioner because the matter essentially relates to the transfer of

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the petitioner which is one of the terms and conditions of the services of the petitioner, in which the constitutional Court under Article 199 has no jurisdiction to interfere. Even otherwise, by now the seat has been filled, therefore, if the petitioner feels aggrieved of the said order, she may approach the appropriate forum against the same. With these observations, this petition being not maintainable is dismissed in limine.

Announced
Dt. 19.11.2018

~~JUDGE~~

Certified to be true copy

M. Rafiq
EXAMINER

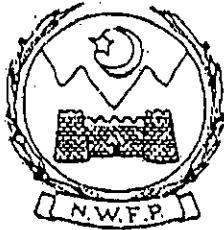
JUDGE

Peshawar High Court, Mingora/Dar-ul-Qaza Swat
Authorized under Article 97 of the Constitution of Pakistan, 1973

S.No. 94
Name of Applicant MIR ZAMIR
Date of Presentation of Applicant 4.12.18
Date of Completion of Copies —
No of Copies 4P
Urgent Fee —
Fee Charged 8/-
Date of Delivery of Copies 04.12.18

Office
01/12/2018

Nawab (D.B.) Hon'ble Mr. Justice Muhammad Ghazanfar Khan
Hon'ble Mr. Justice Syed Arshad Ali



GOVERNMENT OF NWFP
ESTABLISHMENT & ADMINISTRATION
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) The normal tenure of posting shall be three years subject to the condition that for the officers/officials posted in unattractive areas the tenure shall be two years and for the hard areas the tenure shall be one year. The unattractive and hard areas will be notified by the Government.
- v) { }
- vi) While making postings/transfer from settled areas to FATA and vice-versa, specific approval of Governor, NWFP needs to be obtained
- ²While making postings/transfers of officers/officials up to BS-17, from settled areas to FATA and vice-versa approval of the Chief Secretary NWFP needs to be obtained. Whereas, in case of posting/transfer of officers in BS-18 and above, from settled areas to FATA and vice versa, specific approval of the Governor NWFP shall be obtained.
- vi(a) All Officers/officials selected against Zone-I/FATA quota in the Provincial Services should compulsorily serve in FATA for atleast eighteen months in each grade. This should start from senior most scales/grades downwards in each scale/grade of each cadre.
- vii) Officers may be posted on executive/administrative posts in the Districts of their domicile except District Coordination Officers (D.C.Os) and 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.
- 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.
- 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.
or widow

ATTESTED
[Signature]

ATTESTED

ATTESTED
[Signature]

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

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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 NWFP Government Rules of Business 1985, transfer of officers shown in column 1 of the following table shall be made by the authorities shown against each officer in column 2 thereof:

Outside the Secretariat		
1.	Officers of the all Pakistan Unified Group i.e. DMG, PSP including Provincial Police Officers in BPS-18 and above.	Chief Secretary in consultation with Establishment Department and Department concerned with the approval of the Chief Minister.
2.	Other officers in BPS-17 and above to be posted against scheduled posts, or posts normally held by the APUG, PCS(EG) and PCS(SG).	-do-
3.	Heads of Attached Departments and other Officers in B-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 b) To and from an Attached Department c) Within the Secretariat from one Department to another	Secretary of the Department concerned. Secretary of the Dept in consultation with Head of Attached Department concerned. 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.

ATTESTED

ATTESTED

ATTESTED

Handwritten marks: circled initials, circled number 25, and a circled number 3.

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.

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}.

ATTESTED

ATTESTED

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:

ATTESTED

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.

VAKALATNAMA

In The KP Service Tribunal, Peshawar.

_____ OF 2018

Naseem Begum.

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Education Dept.

(RESPONDENT)
(DEFENDANT)

I/We Naseem Begum.

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. ____/____/2018



CLIENT


ACCEPTED

NOOR MOHAMMAD KHATTAK

&


MUHAMMAD MAAZ MADNI
ADVOCATES

OFFICE:

Flat No.3, Upper Floor,
Islamia Club Building, Khyber Bazar,
Peshawar City.
Phone: 091-2211391
Mobile No. **0345-9383141**

قیمت
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ایڈوکیٹ: اعلیٰ خان ایڈووکیٹ

بار کونسل / ایسوسی ایشن نمبر: bc-1a-0840

رابطہ نمبر: 0342-9169913, 0312-97667



پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: ضبر پختونخواہ سروس ٹریبونل لٹامہ

مخاطب: <u>Mst. Hayadara.</u> <u>Resp # 4</u>	دعویٰ: <u>Service Appeal</u>
	علت نمبر: <u>/</u>
	مورخہ: <u>11-03-2019</u>
	جرم: <u>/</u>
	تھانہ: <u>/</u>

باعث تحریر آنگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ سروس
مقام لٹامہ کیلئے اعلیٰ خان کو وکیل مقرر
کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو
راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق
زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری کی طرف سے اپیل کی برآمدگی اور منسوخی، نیز
دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب
مقرر شدہ کو وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا
دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے
باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے
المرقوم

11-03-2019

Hayadara

مقام سروس ٹریبونل لٹامہ کے لیے منظور ہے۔

Attested
and
accepted by
[Signature]

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

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Before the Khyber Pakhtunkhwa Service Tribunal, Peshawar.

In Re

Appeal No. _____ 2018.

Naseem Begum

Vs

Education Deptt:


INDEX

No.	Descriptions	Annexure	Pages
1.	Written Reply to memo of appeal		1-4
2.	Written Reply to application for suspension of operation of the impugned order		5-6
3.	Application to DEO (F) for transfer	"A"	7
4.	Transfer Order dated 04-09-18	"B"	8
5.	Charge Report	"C"	9
6.	Monthly Staff Statement for the month of may 2018	"D"	10
7.	Domicile Certificate	"E"	11
8.	Electricity & Gas Bills	"F"	12-13
9.	Sale Deed dated 03-07-2010	"G"	14
10.	Respondent's husband service certificate	"H"	15
11.	Copy of Spouse policy/rules	"I"	16

Dated: 25-03-19

Through

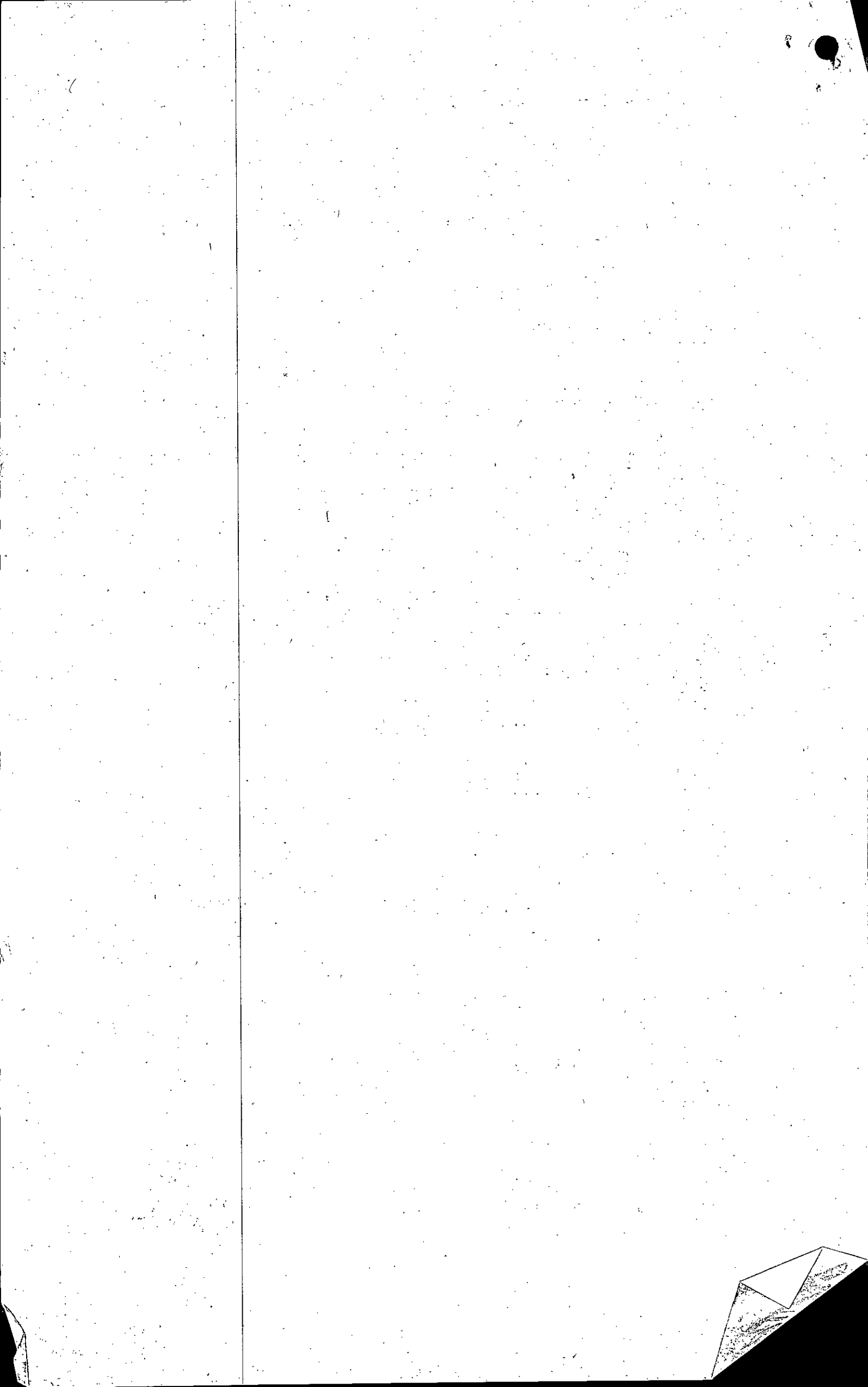
Respondent No.4


Ajmal Khan Khattak

Advocate, Peshawar.

Cell # 0345-9169913

OFF: Office No.1, Zafar Plaza, Opposite Dargai Thana,
Dargai Pattock, Dargai Malakand.



Before the Khyber Pakhtunkhwa Service Tribunal, Peshawar.

In Re

Appeal No: _____ of 2018.

Mst.Naseem Begum **versus** The Secretary (E&SE) Deptt: etc

Written Reply for & on behalf of Respondent No.4

Preliminary Objection:

1. That the appellant has got no cause of action to prefer the instant appeal.
2. That the instant appeal has not been filed in accordance with the rules laid down in the Service Tribunals Rules, 1974, therefore, the instant appeal is incompetent in its present form.
3. That the appellant has not come to this honorable tribunal with clean hands.
4. That the instant appeal is hopelessly time barred.
5. That the Honorable Tribunal has got no jurisdiction to adjudicate upon the matter.
6. That the transfer is necessary feature of service and can be best judged by the authority under which a person is serving, moreover the impugned order is not contrary to the law, rules and established norms, hence the instant appeal is liable to be rejected on this score alone.
7. That the appellant is bound under the law and rules to serve wherever she is posted or transferred by the competent authority.
8. That the appellant failed to prefer a departmental appeal or representation before the competent authority, hence without recourse to the departmental appeal, the instant appeal is not maintainable.
9. That the appellant failed to point out any political victimization, mala fides or ulterior motive in the impugned order, hence the instant appeal is liable to be rejected on this score alone.
10. That the impugned order has been passed in pursuance of greater length of service of the replying respondent in one station i.e she served for more than 29 years in GGPS Anar Tangai, therefore, the impugned order has been passed

strictly in accordance with law, rules and norms of justice.

11. That the replying respondent belongs to the same union council by birth and after her marriage, her husband has also shifted to sakhakot in the year 2010, moreover her husband is also serving as SST in GHS # 2 Sakhakot MKD, therefore, the impugned order is also consonant with spouse policy duly notified by the provincial government in the year 2012.

12. That replying respondent has taken charge of her post in compliance of the impugned order immediately; therefore, appeal as well as interim relief application of the appellant has become infructuous.

ON FACTS:

1. Para No.1 needs proof, hence denied as laid.

2,3,4. In reply to these paras it is submitted that the replying respondent having greater length of service than the appellant. She has been served the department quite efficiently for the last 29 years in GGPS Anar Tangai and her transfer order has been made in pursuance of greater length of service in one station. It is pertinent to mention here that although union council policy is not applicable here to the post of BPS-15 but in spite thereof, the replying respondent belongs to Sakhakot union council by birth and after her marriage, her husband has also been shifted to sakhakot permanently in the year 2010, moreover her husband is also serving as SST in GHS # 2 Sakhakot MKD, therefore, the impugned order is also consonant with spouse policy duly notified by the provincial government in the year 2012 and to section 2 of the Transfer/Posting Regulatory Act, 2011 as well. (Copy of Transfer application, transfer order, charge report, monthly staff statement for the month of may-2018, Domicile, Electricity & gas Bills and sale deeds of home at sakhakot, Service Certificate of husband and rules are attached as Annexure "A", "B", "C", "D", "E", "F", "G", "H" and "I" are attached for perusal respectively.)

5. Para No.5 of the appeal is incorrect, illegal, against the law and facts, hence vehemently denied as laid. In reply to this para it is submitted that the appellant has badly failed to prefer a departmental appeal or representation before the

competent authority, hence without recourse to the departmental appeal, the instant appeal is not maintainable.

6. Para No.6 of the appeal is incorrect, illegal, based on conjecture and surmises, hence denied as laid.

Grounds:

- A. Para under reply is incorrect, unlawful, against the actual facts and circumstances of the case, hence vehemently denied as laid. That the impugned order has been passed strictly in accordance with law, rules and norms of justice.
- B. Para under reply is incorrect, unlawful, against the actual facts and circumstances of the case, hence vehemently denied as laid. In reply to this para it is submitted that the appellant is not entitled under the law and prevailing rules for the relief as prayed for.
- C. Para under reply is incorrect, illegal, against the law and facts, hence vehemently denied as laid. In reply to this para it is submitted that the appellant has been treated strictly in accordance with law and rules. That the competent authority keeping in view, the greater length of service of the replying respondent in a far flung and hard area for the last 29 years, spouse policy because the replying respondent husband i.e Mr.Haroon ur Rasheed is also serving in GHS # 2 Sakhakot as SST (SC) BPS-16 which is situated in the same union council, therefore, the respondent has not violated article 4 and 25 of the constitution of Islamic Republic of Pakistan.
- D. Para under reply is incorrect, illegal, against the actual facts, hence denied as laid. In reply to this para it is submitted that the impugned order has been passed strictly in accordance with the prevailing rules and policy in vogue.
- E. Para under reply is incorrect, unlawful, against the actual facts, hence vehemently denied as laid. In reply to this para it is submitted that the impugned order dated 4-09-18 is not contrary with clause iv of the transfer/posting policy rather it is tantamount to clause ii of the policy ibid.
- F. Incorrect, illegal, against the facts and circumstance of the case, hence vehemently denied as laid.
- G. Incorrect, illegal, against the actual facts, based on surmises and conjecture, hence denied as laid. In reply to

(4)

this para it is submitted that there is no even iota of evidence on the case file to prove that the respondent has been acted in an arbitrary and mala fide manner while transferring the replying respondent.

H. Incorrect, detailed reply has already been given in the preceding paras.

I. Incorrect and against the law, hence denied.

It is therefore, most humbly prayed that on acceptance of the instant written reply, the appeal of the appellant being devoid of merits may kindly be dismissed with cost throughout.

Hayedara
Respondent No. 4

Dated: 25-03-19

Through



Ajmal Khan Khattak
Advocate, High Court,
Peshawar.

5

Before the Khyber Pakhtunkhwa Service Tribunal, Peshawar.

In Re

Appeal No. _____ 2018.

Naseem Begum

Vs

Education Deptt:

Written reply for & on behalf of respondent No.4
to the application for suspension of operation of
the impugned order dated 04-09-18.

Preliminary Objections:

1. That the applicant has got no cause of action to file the instant application.
2. That the application is liable to be dismissed in a cursory manner.
3. That the applicant has got no prima facie case, therefore, not entitled for the relief as prayed for.
4. That the application is incompetent in its present form.
5. That the impugned order dated 04-09-18 has been passed strictly in accordance with law, rules and norms of justice, therefore, operation of the impugned order cannot be suspended on mere presumption and assumption.

On Paras:

1. Para No.1 of the application pertaining to record, hence needs no reply.
2. Para No.2 of the application is against the law, rules and actual facts, hence vehemently denied as laid. In reply to this para it is submitted that the impugned order has been passed strictly in accordance with law and rules and no violation of the provision of Transfer/Posting Regulatory Act, 2011 has been made by the competent authority.
3. Para No.3 of the application is incorrect, unlawful and against the actual facts, hence vehemently denied as laid. In reply to this para it is submitted that neither a prima facie case exist in favor of the applicant nor

(6)

balance of convenience tilt in favor of the applicant, moreover there is no irreparable loss caused to the applicant, in case if the stay was not granted in favor of the applicant.

4. Para No.4 is incorrect, illegal, against the law and actual facts, hence vehemently denied as laid.

It is, therefore, most humbly prayed that on acceptance of the instant written reply, the application in hands being devoid of merits may be dismissed with cost throughout.

Dated: 25-03-19

Through

Hayadara
Respondent No.4

Ajmal Khan Khattak
Ajmal Khan Khattak
Advocate, Peshawar.

Affidavit

I, Mst.Hayadara do hereby solemnly affirm and declare on oath that contents of the above written reply are true and correct to the best of my knowledge and belief and nothing has been kept back from this honorable Tribunal.

Hayadara
DEPONENT

[Signature]
ATTESTED
KHALIDA RAHMAN
ADVOCATE
OATH COMMISSIONER
PESHAWAR
25/3/19

گورنمنٹ ڈسٹرکٹ ایجوکیشن آفیسر (F) ہیڈ فیلڈ ملازمتی ایجنسی

جناب عالیہ -

خدمت اقدس میں میں گزارش ہے کہ میں 1990ء سے گورنمنٹ ٹریننگ پرائمری سکول رتارتی میں ہیڈ ٹیچر ہوں۔

یہاں اکتوبر 2018ء سے تاج الموری میں ہیڈ ٹیچر گورنمنٹ ٹریننگ پرائمری سکول غلام مسخا کوٹ ریٹائر ہو رہی ہیں۔

میری بانی کر کے اس پوسٹ پر جیادارہ ہیڈ ٹیچر گورنمنٹ ٹریننگ پرائمری سکول رتارتی کا تبادلہ کیجئے مگر ہر دعا کو قبول فرمائیے۔ شکریہ

حرفہ 7-8-2018

Recommended to

SDEO (F) Dargai

آپ کا تابع فرمان

جیادارہ

ASDEO (F)
Circle Zoormandi

گورنمنٹ ٹریننگ پرائمری سکول
رتارتی

Hayadaya

Head Mistress
G.G.P.S Anar Tangai
Malakand

7-8-2018

Attested to be True
AJMAL KHAN
Advocate
High Court Peshawar
Bar-Council No. 0840

(8)

Annex "B"

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MALAKAND AT BATKHELA.

OFFICE ORDER/

Consequent upon recommendation of the placement Committee and approval of the Nazim District Government Malakand for Transfers of the following Primary School Teacher (PSHT/SPSTs/PSTs) against the vacant posts are hereby ordered to the schools noted against each their names on their own pay and scale in the interest of public service from the date of their taking over charge.

S.No	Name and Designation	From	To	Remarks
1	Lubna Kiramat PST	GGPS No.2, Khanoor	GGPS Dhad Dheri	A.V.Post
2	Salma Khurshed SPST	GGPS CC Thana	GGPS No.1 Thana	A.V.Post
3	Dilshad Begum PST	GGPS Halbat Gram	GGPS CC Thana	A.V.Post
4	Sadaf Bibi PST	GGPS Aspur (Total)	GGPS Bagh Kalli (Total)	Vice S.No.6
5	Shaheen Begum PST	GGPS Bagh Kalli (Total)	GGPS Serai (Total)	Vice S.No.8
6	Saima Ashraf PST	GGPS Naranji (Total)	GGPS Aspur	Vice S.No.5
7	Asla Bibi PST	GGPS Serai (Total)	GGPS Naranji (Total)	Vice S.No.7
8	Saima Bibi PST	GGPS Sargara (Agra)	GGCMS Qaidara	A.V.Post
9	Sadia Wahid PST	GGPS Bazdara Bala	GGPS No.1, Palal	A.V.P
10	Sarwat Ara PST	GGPS Maizara Thana	GGPS No.1, Thana	A.V.P
11	Uzma PST	GGPS Gul Muqam	GGPS Darga	A.V.P
12	Hayadara PSHT	GGPS Anar Tangal	GGPS No.2, Sakhkot	w.e. from 1.10.2018

Note:- No TA/DA is allowed.
Charge report should be submitted to all concerned.

(SADIA ILYAS)
DISTRICT EDUCATION OFFICER (FEMALE)
MALAKAND AT BATKHELA.

Endst.No. 3707-16 / FNo.02/Transfer PST(F)/2018/Dated the 04/10/2018.

- Copy forwarded for information and necessary action to the:
1. The Director E&SE Department Khyber Pakhtunkhwa, Peshawar.
 2. The Nazim District Government Malakand.
 3. The Deputy Commissioner Malakand.
 4. The District Monitoring Officer Malakand.
 5. The Sub Divisional Education Officer (Female) Swat Ranizai at Batkhela.
 6. The Sub Divisional Education Officer (Female) Sama Ranizai at Dargai.
 7. The District Accounts Officer Malakand.

AJMAL KHAN
Advocate
High Court Peshawar
Bar Council No. BC-10830
Attested to be true
[Signature]

Amor B


Amor B

9

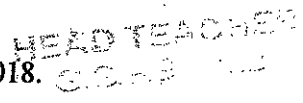
Annex 'c'

CHARGE REPORT

In compliance with transferred order issued by District Education Officer (F) Malakand at Batkhela Endst; No 3707-16 dated 04-09-2018. Mrs Hayadara PSHT BPS 15 GGPS Anar Tangai has been transferred to GGPS No 2, Sakhakot PSHT post BPS 15 & took over charge as PSHT BPS 15 post at GGPS No 2, Sakhakot, District Malakand today on 01-10-2018 (F.N).

Signature of Relieved 
Government servant VACANT
Station GGPS No 2, Sakhakot
Designation PSHT BPS 15

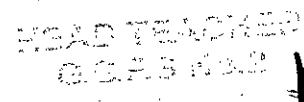
Signature of Relieving Hayadara 1-10-2018
Government servant. HAYADARA
Dated 01/10/2018 (F.N)
Designation PSHT BPS 15

Endst: _____ /Charge report dated GGPS No 2, Sakhakot _____ 2018. 

Copy forwarded for information to :

1. The District Education Officer (M) Malakand at Batkhela.
- ~~2. The District Accounts Officer Malakand.~~
3. The Sub; Divl; Edu; Officer (F) Dargai, District Malakand.

Hayadara
HEAD MISTRESS
GGPS NO 2, SAKHAKOT
DISTRICT MALAKAND


Muhammad Iqbal Khan
Advocate
High Court Peshawar
Bar-Council No. 10-0840

ANKA C



10

OFFICE OF THE HEAD-TEACHER, GGPS/GGC
MONTHLY STAFF STATEMENT FOR THE MO

S.NO	NAME	FATHER NAME	DESIG:	Personal No.	NIC
1	Hayadara	S. Mahboob Shah	PstT	00239873	1540109
2	Fezia Bibi	Abdul-Hassan	SPST	00243820	1540109
3	Haider Khan	Mohd Yaseen	Phon	00251100	1540109
4					
5					
6					
7					
8					
9					
10					
12					
13					
14					
15					
16					
17					

Attended to be true
Advocate KHAN
High Court Peshawar
Bar-Council No. 10-01

Answer D.

(10)

10

11

Annex "E"

DOMICILE CERTIFICATE.

No. 557 /

Dated. 22-7 /1984

Certified that Mr/Miss HEBI son/daughter of VEDA belong to a recognised tribe of SECTION SECTION and his/her father is a permanent bonafide resident of the tribal areas of Agency of Malakand, VILLAGE and he/she is an eligible candidate to avail himself/herself of the seats reserved for the Special Areas of Division of Malakand Backward Areas.



[Handwritten signature]

Dated Malakand.
22-7 /1984

(Signature)
POLITICAL AGENT, MALAKAND.

Attested to Beera
Attorney
High Court Peshawar.
Bar-Council No. SC-10-0840
[Handwritten signature]

ANKER 67



PESHAWAR ELECTRIC SUPPLY COMPANY - ELECTRICITY BILL

www.pesco.gov.pk

G.S.T # 21-00-2716-001-46

SUB-DIVISION	سب ڈویژن	BILL MONTH	بیل ماہ	READING DATE	تاریخ ریڈنگ	ISSUE DATE	تاریخ اجراء	DUE DATE	مقررہ تاریخ
SAKHAKOT		15	Apr 18	06 APR 18		17 APR 18		27 APR 18	

REFERENCE No.	حوالہ نمبر	TARIFF	نرخ	LOAD	لوڈ	OLD A/C No.	پراانا کھاتہ نمبر	In case of non attendance or non satisfaction from given complaint numbers, please contact the Electric Inspector at Benevolent Fund Building, Third Floor, near Jans Bakers, Peshawar Cantt. Tel: 091-9211343 Fax: 091-9213557	
07 26516 0323730 26050194285		A-1A(01)		1.00		04265110323730			
NAME & ADDRESS		نام و پتہ	CONN. DATE	تاریخ کنکشن	29 DEC 12				

HAROON RAHSHEED
H KMAT SHAH
PURANA SAKHAKOT
DARGAI MKD

**SAY NO TO
CORRUPTION**

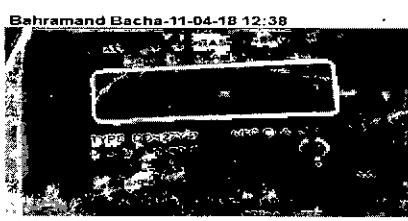
METER No.	میزٹر نمبر	PREVIOUS	سابقہ ریڈنگ	PRESENT	موجودہ ریڈنگ	MF	مز فرائی	UNITS	یونٹ	STATUS	حالت میٹر
S P 207788		13532		13843		1		311			
TOTAL UNITS CONSUMED	کل صرف شدہ یونٹ	TOTAL COST OF ELECTRICITY	مجموعہ قیمت بجلی	METER RENT	کرایہ میٹر	SRVC. RENT	کرایہ سروس	INCOME TAX WITH HELD	آئینگیس		
311		3236.00		N.J.Sur = 31.10							

ELECTRICITY DUTY	D.S Sur	مصونگی بجلی	INSTALMENT	قسط	BILL ADJ.	تصحیح	CURRENT BILL	موجودہ بیل	3449
48.54			133.73				ARREARS/AGE	بقایا اجات	
PTV FEE	ٹیلی ویژن فیس	G.S.T.	جزل پیکس	UNPAID DEBT	بہا یا واجب الادا	DEFERRED AMOUNT	TARIFF SUBSIDY + GST	رعایت	

FEEDER	DARGAI NEW	BILL CALCULATION	بیل حساب	PAYABLE WITHIN DUE DATE	مقررہ تاریخ تک واجب الادا	3449
DIVISION	DARGAI	NEPRA SubSidy	GoP. Units	L.P. SURCHARGE	مقررہ تاریخ تک بل نہ دیا کر کے کی صورت میں سرجارج	340
		tariff rate	tariff	GST ON LPS	ایل پی ایس پر جزل پیکس	0
		16.9550 - 09.7550 = 10.2000 x 300		PAYABLE AFTER DUE DATE	مقررہ تاریخ کے بعد واجب الادا	3789
		18.3300 - 02.3300 = 16.0000 x 11				

For Other Complaints
SDO : 9324425 / 5000-0000000
XEN : 9323327 / 7000-0000000
S.E : 9240364

بجلی چوری کی اطلاع مندرجہ ذیل نمبر پر دیں۔
Toll Free No. 0800-84338



Attended by
ADAM KHAN
Advocate
High Court Peshawar
Bar-Council No. 111/0-0840

آئیں! بدعنوانی کے خلاف ملوث کرپشن
National Accountability Bureau KP
PDA Complex, Block III Phase - V Hayatabad Peshawar
Tel: 991-9217568, Fax: 091-9217220
Email: nab.gov.pk

Kaka Khailani Communication
22 APR 2018
11715

Khatak Plaza Peshawar
SAKHAKOT

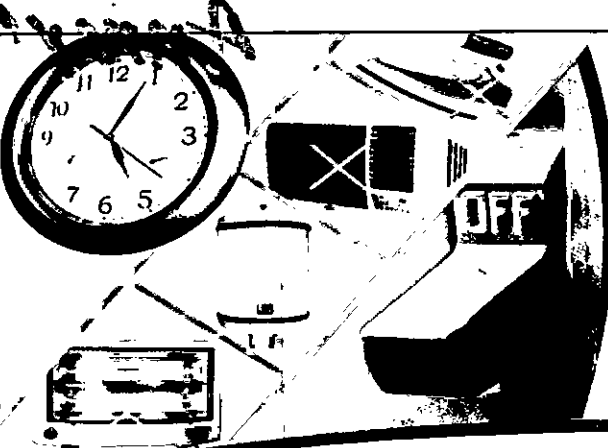
شام 5 قارات 11

استعمال میں ترتیب - بچت یقینی

بجلی بجلی کے اوقات

- 1- جن - اگست 7 بجے تا 11 بجے
- 2- ستمبر - نومبر 6 بجے تا 10 بجے
- 3- دسمبر - فروری 5 بجے تا 9 بجے
- 4- مارچ - مئی 6 بجے تا 10 بجے

آلات	5 بجے - 11 بجے	100 واٹ سے زائد	بلب میں بچت
100-100	150/-	830/-	680/-



شام 5 تا 11 بجے بجلی کا استعمال کم سے کم کریں اور بجلی کے بل میں

50% فیصد تک بچت پائیں

اس سلسلے میں 5 کلو واٹ یا اس سے زائد واٹ کے گھریلو، کمرشل اور صنعتی صارفین کیلئے **TOU** میٹر لگائے جا رہے ہیں

خواتین سے التماس ہے کہ

بجلی کم استعمال کر کے

ملک اور پیسکو کی ترقی میں ساتھ دیں

بجلی کا با کفایت استعمال بچت پر مثال

ENERGY

Use less - save more

بہتر کل کے لیے آج بجلی بچائیں۔۔

آرائشی بتیاں کم سے کم استعمال کریں۔

SAVE

کم جلائیں
بھت بچائیں

آگ میں ہم سب مل کر گائے طالب علموں کو

روشن مستقبل کی خوش خبری سنائیں۔۔

بجلی کے بلوں پر اشتہارات کے لئے پیسکو تعلقات عامہ سے فون نمبر 091-5255345 پر رابطہ کریں۔

بجلی بچانے کے چند سنہرے اصول:

گھریلو صارفین

- فالتو بتیاں مت جلائیں۔ عام بلب کی بجائے انرجی سیور استعمال کریں۔
- بجلی کی استری انتہائی گھٹ کے اوقات یعنی شام 6 بجے سے 10 بجے تک استعمال مت کریں۔
- بجلی کے میٹر اور گیزر کا استعمال صرف انتہائی ضرورت کے وقت کریں۔
- ایئر کنڈیشنر کا استعمال کم سے کم کریں۔ ایئر کنڈیشنر کا تھر موڈ کم (26) پر رکھیں۔
- چھت کی انسولیشن کرانیں۔
- ٹی وی اور بی سی ہمیشہ سوچے سے آف کریں۔ سٹیٹنڈ بائی پر نہ رکھیں۔

برقی آلہ	تعداد واٹ	استعمال شدہ یونٹ	بچت
بلب	4	400	42
ٹیوب لائٹ	4	160	18
انرجی سیور	4	80	9

زرعی صارفین

- زرعی ٹیوب ویلیوں پر TOD میٹر نصب کر دیئے گئے ہیں جن کے استعمال سے کاشتکار بھائی اپنے ٹیوب ویل 10 بجے رات سے 6 بجے تک چلا کر 75 پیسے کی یونٹ رعایت کا فائدہ اٹھائیں۔
- یاد رکھیے اون کے وقت فصلوں کو پانی نہ گانے سے بہت سا پانی بخارات کی صورت میں اڑ جاتا ہے۔ اگر رات کے وقت فصلوں کو پانی دیا جائے تو اون کے وقت ضائع ہونے والا پانی بچایا جا سکتا ہے۔
- ٹیوب ویل کی جمل جاننے والی سوز کو گھسی کو اپنی کے تار کے ساتھ ریو اسٹنڈ کروائیں۔ اس سے نہ صرف سوز زیادہ دور تک چلے گی بلکہ آپ کا بل بھی کم آئے گا۔

کاروباری صارفین

- دکانوں میں آرائش کے لئے بلب کی جگہ انرجی سیور استعمال کریں۔
- شام 6 بجے سے رات 10 بجے تک ایئر کنڈیشنر کے استعمال میں احتیاط کریں۔
- چھت کی انسولیشن بجلی کے اخراجات میں کمی کا باعث ہے جس کا مطلب ہے منافع میں اضافہ۔

In case of any complaint, the consumers are advised to approach PESCO in the first instance. If the complaint is not resolved, the consumers may file complaint with NEPRA at following address:

NEPRA Regional Office, Peshawar,
6th, Sadder Road, 2nd Floor,
Tasneem Plaza, Peshawar Cantt.,
OR

Consumer Affairs Department,
National Electric Power Regulatory Authority (NEPRA),
Attaturk Avenue (East), Sector G-5/1, Islamabad.

"Any person having complaint against PESCO regarding (i) metering (ii) billing and (iii) collection of tariff may be referred to the concerned PESCO office. Alternately in case of non attendance or non satisfaction such complaints can also be filed with the respective Provincial Office of Inspection (POI) also known as Electric Inspector on the following address"

Electric Inspector / POI

3rd Floor Benevolent Fund Building
Near Jan Bakers Peshawar Cantt.

Phone No. 091-9211343, Fax No. 091-9213557



SUI NORTHERN GAS PIPELINES LIMITED

سوی ناردرن گیس پائپ لائنز لمیٹڈ

BAGH DADA ROAD MARDAN

18-4
6230268

گسٹرنومبر
کاپی نمبر
15,359

Name: **HAROON RASHID S/O HIKMAT SHAH**
 Address: **KHWAZA KHELA OLD SAKHAKOT MKD**
Account ID 38260368857 Bill ID 382603405746
 Consumer GST/NTN /
 Zone/Postal Code(Service Cycle)/Book/Page No: (8531)/ 053 / 79
 Security Deposit (Cash/Bank).

Account ID	مدف نمبر	38260368857
Billing Month:	بھ کاپی نمبر	Jun 2018
Payable within due date (Rs.)	داجب الاداء نم	460
Due Date	آخری تاریخ ادائیگی	02-08-2018
Amount after due date (Rs.)	گسٹرنومبر کے بعد ادائیگی کی رقم	510
CNIC No:	قومی شناختی کارڈ نمبر	

Tariff	DOM - G	Meter Reading
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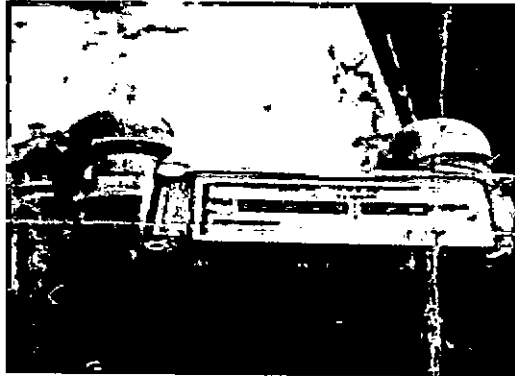
Meter No.	Current	Previous	Difference
ZA1510856242	02529100	02444100	00085000

Period	Pres. factor	Temp. factor	Super Compressibility	Gas Consumed HM3	GCV
From 1.00	1.0683	1	0.0000	0.908	1,060
To 11-06-18					
To 12-07-18					
Issue Date: 19-07-2018	* MMBTU = (HM3 * GCV / 281.7385)				

CURRENT CHARGES

Gas Charges	گسٹ کی قیمت	375.76
Prov. Bill Adjustment	بل میں غور کی چیز	
Meter Rent	میٹر کا کرایہ	20.67
GST	جزل ٹیکس	67.39
Rebate / Adjustment	پھرت / ایڈجسٹمنٹ	0.00
Other Charges	دیگر داجبات	0.00
Arrears / Aging	پتایا جات	0.89 / 0
Current Bill	سجوزور بل	463.82
Late Payment Surcharge (Rs.)	تاخیر سے ادائیگی پر جرمانہ	
Total Amount Due	داجب الاداء نم	460

Notification
 Wobbe Index: 1355



For energy Conservation please visit our web site www.sngpl.com.pk

توجہ! قومی شناختی کارڈ نمبر 31 دسمبر 2018 تک ہماری ویب سائٹ پر اپنی شناختی کارڈ نمبر 1199 پر قومی گیس کمپنی میں رجسٹریشن کرنا ضروری ہے۔ بصورت دیگر آپ کو گیس کی فراہمی میں دشواری پیش آسکتی ہے۔

For Emergencies and Complaints Please Call 1199

DOM Gas Rates w.e.f. 01-09-2015		
Slab	Usage of Gas	All off-takes at flat rate of Rs. Per MMBTU
1.00	Up to 1.00	110.00
2.00	Over 1 to 3	220.00
3.00	Above 3	600.00
Usage of Gas based on 30 Days		

PAYMENT HISTORY

Month	HM3	Current Bill	Amount Due	Payment
May 2018	0.780	400.23	400	400
Apr 2018	1.122	1,101.64	1,100	1,100
Mar 2018	0.845	427.88	430	430
Feb 2018	1.731	1,691.60	1,690	1,690
Jan 2018	1.998	1,957.00	5,180	5,180
Dec 2017	3.034	2,931.77	2,930	
Nov 2017	1.474	1,448.37	1,450	1,450
Oct 2017	1.068	1,059.70	1,060	1,060
Sep 2017	0.821	423.01	420	420
Aug 2017	1.100	560.37	1,100	1,100
Jul 2017	0.940	483.14	490	
Jun 2017	0.716	371.78	370	370

www.sngpl.com.pk سے بھی حاصل کیا جاسکتا ہے۔ اس کے علاوہ گیس بل کی گزشتہ ادا کی گئیاں جاننے کے لیے بھی ہماری ویب سائٹ وزٹ کیجیے۔

SNGPL GST/NTN 03-91-9999-967-19/0801137-7

HOD/121/18

قومی شناختی کارڈ نمبر کی شناخت پر بلا حذر فراہم کیا گیا۔

گیس سے متعلق کسی بھی قسم کی ایمر جنسی صورت حال، گیس فراہمی کے مسائل یا گیس اخراج کی اطلاع فوری طور پر ہمارے ہیلپ لائن نمبر 1199 پر دیجیے۔

ہدایات برائے صارفین:

عمومی ہدایات:
۹۔ سوئی ناردرن گیس کی خدمات سے متعلق کسی بھی قسم کی معلومات کے حصول کے لیے ہیلپ لائن نمبر 1199 پر رجوع فرمائیں۔

۱۰۔ اسٹیٹ بینک کی ہدایات کے تحت تمام بینکنگ معزز صارفین کو سایہ دار جگہ، پینے کے لیے ٹھنڈے پانی اور پیٹھے کے لیے مناسب انتظام کی فراہمی کے پابند ہیں۔ ان میں کسی بھی سہولت کی عدم فراہمی کی شکایت فوری طور پر ہیلپ لائن نمبر 1199 یا ہماری ویب سائٹ www.sngpl.com.pk پر درج کرائیں۔

۱۱۔ اگر کسی صارف کو سوئی گیس کمپنی کے (1) میٹرنگ (2) بلنگ (3) میٹرف کی بابت کوئی شکایت ہے تو اپنے متعلقہ سوئی گیس آفس سے رابطہ کرے۔ بصورت دیگر شنوائی نہ ہونے کی صورت میں وہ اوگرا میں تحریری یا آن لائن مای میل پر شکایت درج کروا سکتا ہے۔ تحریری شکایت کی صورت میں اوگرا کا ایڈریس یہ ہے:

رجسٹرار اوگرا، پلاٹ نمبر B-54، فضل حق روڈ، بلیوار یا، اسلام آباد
ای میل: registrar@ogra.org.pk

احتیاطی تدابیر:

۱۲۔ گیس آلات کا استعمال کرتے ہوئے احتیاطی تدابیر پر سختی سے عمل کریں۔

۱۳۔ رات سونے سے قبل گیس کے تمام آلات اور ان کے لیے نصب والوز بھی بند کر دیں۔

۱۴۔ گیس آلات کے استعمال سے قبل باورچی خانے کی کھڑکیاں اور دروازے کھول دیں۔ کچھ دیر انتظار کے بعد آلات کا احتیاط سے استعمال کریں۔

۱۵۔ ان احتیاطی تدابیر پر عمل کرنے سے نہ صرف ممکنہ حادثات کی روک تھام ہو سکے گی بلکہ زائد بلنگ سے بھی بچا جاسکے گا۔

۱۔ گیس بل کی بروقت ادائیگی صارفین کی ذمہ داری ہے۔ بل موصول نہ ہونے کی صورت میں اپنے رجمن میں واقع سوئی ناردرن گیس کے بلنگ ڈیپارٹمنٹ یا قریبی کسٹمر سروس سینٹر سے رجوع کریں۔ بل کی نقل ہماری ویب سائٹ www.sngpl.com.pk سے بھی حاصل کی جاسکتی ہے۔ بل نہ ملنے کی شکایت ہیلپ لائن نمبر 1199 پر ضرور درج کرائیں۔

۲۔ گیس بل میں کسی قسم کی غلطی کا اندیشہ ہو تو ہمارے بلنگ ڈیپارٹمنٹ سے رجوع کریں تاہم جرمانے سے بچنے کے لیے بل کی بروقت ادائیگی لازمی ہے۔

۳۔ بل کی ادائیگی کی آخری تاریخ کو عام تعطیل ہونے کی صورت میں آخری تاریخ اگلے روز تصور کی جائے گی۔

۴۔ گیس بل کی ادائیگی تمام بینکنگ، باور کویوسک، ڈاک خانوں، ای ٹی ایمز اور انٹرنیٹ بینکنگ کے ذریعے کی جاسکتی ہے۔

۵۔ بل کی ادائیگی بذریعہ آے آر ڈی یا چیک سے بھی کی جاسکتی ہے۔ سوئی ناردرن گیس پائپ لائنز لمیٹڈ کے نام اور Payee's Account Only ہو نا چاہیے اور مقررہ تاریخ سے تین روز قبل کمپنی یا بینک میں پہنچانا چاہیے، اور اس کی رسید (acknowledgement) بطور ثبوت بھی صارف کے پاس ہونی چاہیے۔

۶۔ عدم ادائیگی کی صورت میں منقطع کی گئی گیس، واجب الادا رقم بمعد بحالی فیس بینک میں نقد یا بذریعہ آے آر ڈی ادائیگی پر ہی بحال کی جائے گی۔

۷۔ اگر بل پر ڈس کنکٹ (Disconnect) تحریر ہو تو اس کا مطلب ہوگا کہ تاریخ ادائیگی موجودہ بل کے لیے ہے اور گیس کی فراہمی بٹایا جات کی وجہ سے بغیر کسی مزید اطلاع منقطع کی جاسکتی ہے۔

۸۔ کسی بھی قسم کی گیس ایمر جنسی، گیس فراہمی سے متعلق مسائل یا گیس اخراج کی اطلاع فوری طور پر ہیلپ لائن نمبر 1199 پر دیں۔



SAY NO TO CORRUPTION

بدعنوانی سے انکار

ماحول کی حفاظت
ہم سب کی ذمہ داری

SAY NO TO DRUGS

منشیات سے انکار



قدرتی گیس ایک قومی دولت۔ گیس چور ہم سب کا مجرم

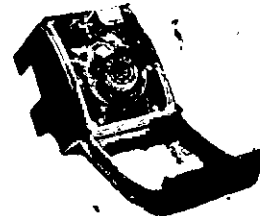
گیس چوری کے خلاف قومی ہم حصہ لیجئے اپنے ارد گرد موجود گیس چوروں کی اطلاع ہماری ہیلپ لائن 1199 پر دیں۔

گیس چوری کی سزا کے لیے کارروائی قوانین پاکستان اور فوجداری قوانین کے تحت کی جائے گی

گیس چوری، گیس پائپ لائنز اور گیس میٹرز کے ساتھ روہیل اور متعلقہ آلات کو نقصان پہنچانا یا اجاگر یا اب تالو ناچرم ہے۔ سوئی ناردرن گیس پائپ لائنز لمیٹڈ نے گھریلا، کرشن اور سنٹی میٹرز میں گیس چوری کے سدباب کے لیے ایک نئی شکل ناک ڈس تشکیل دی ہے۔ گیس چوری کے جرم میں ملوث پائے جانے والے افراد کے خلاف فوجداری قوانین کے تحت سخت قانونی کارروائی عمل میں لائی جائے گی۔

سزا	جرم	قانونی تعلق
5 سال تک قید یا ایک لاکھ روپے تک جرمانہ یا دونوں	گھریلا یا سنٹی میٹر میں گیس چوری	462D

گیس بچائیے، کیش بچائیے



کیزر ٹائمرز ڈیوائس

معلومات اور حصول کے لیے:

فون: 042-99204581

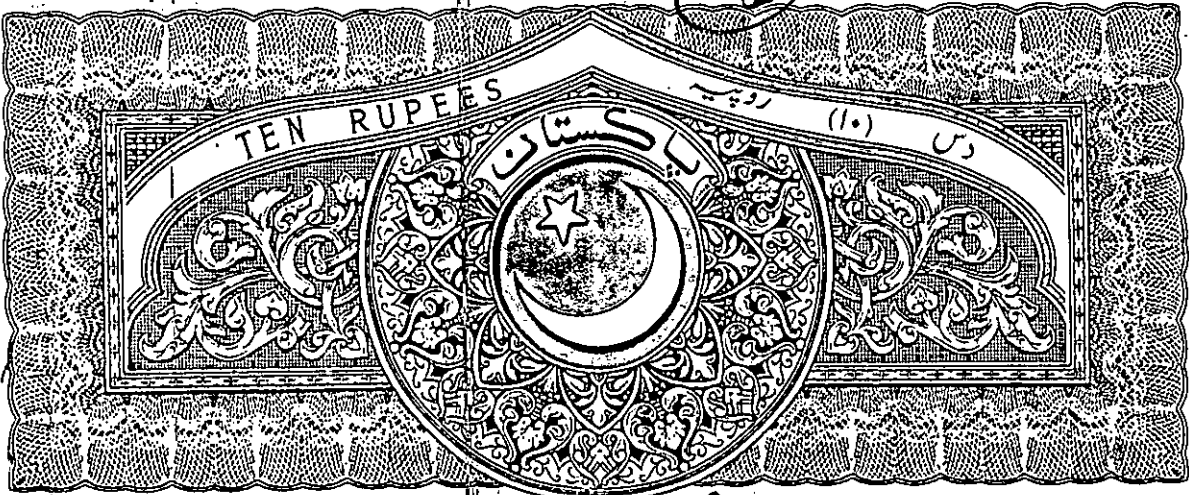
اپیس ایم ایس: 0332-4317776

ای میل: gtd.hse@sngpl.com.pk



سولر واٹر ہیٹرز

14



سینا آزاد خان نے حضرت امام
 محمد تقی صدیق اعظم علیہ السلام سے فرمایا کہ میں نے تمہارا مکتبہ کتب خانہ اور کتب
 خانوں کو دیکھا ہے اور تمہاری کتابوں کو پڑھا ہے۔ ان میں سے بہت سے کتابیں
 یاد ہیں۔ ان میں سے کچھ دیکھنے کی خاطر آئے ہو۔ اس لئے تمہاری خدمت میں
 آج آ رہا ہوں۔ میری تمہاری خدمت میں آج آج ہی آ رہا ہوں۔ میری تمہاری
 خدمت میں آج آج ہی آ رہا ہوں۔ میری تمہاری خدمت میں آج آج ہی آ رہا ہوں۔
 میری تمہاری خدمت میں آج آج ہی آ رہا ہوں۔ میری تمہاری خدمت میں آج آج ہی
 آ رہا ہوں۔ میری تمہاری خدمت میں آج آج ہی آ رہا ہوں۔ میری تمہاری
 خدمت میں آج آج ہی آ رہا ہوں۔ میری تمہاری خدمت میں آج آج ہی آ رہا ہوں۔
 میری تمہاری خدمت میں آج آج ہی آ رہا ہوں۔ میری تمہاری خدمت میں آج آج ہی
 آ رہا ہوں۔ میری تمہاری خدمت میں آج آج ہی آ رہا ہوں۔ میری تمہاری
 خدمت میں آج آج ہی آ رہا ہوں۔ میری تمہاری خدمت میں آج آج ہی آ رہا ہوں۔
 میری تمہاری خدمت میں آج آج ہی آ رہا ہوں۔ میری تمہاری خدمت میں آج آج ہی
 آ رہا ہوں۔ میری تمہاری خدمت میں آج آج ہی آ رہا ہوں۔ میری تمہاری
 خدمت میں آج آج ہی آ رہا ہوں۔ میری تمہاری خدمت میں آج آج ہی آ رہا ہوں۔
 میری تمہاری خدمت میں آج آج ہی آ رہا ہوں۔ میری تمہاری خدمت میں آج آج ہی
 آ رہا ہوں۔ میری تمہاری خدمت میں آج آج ہی آ رہا ہوں۔ میری تمہاری
 خدمت میں آج آج ہی آ رہا ہوں۔ میری تمہاری خدمت میں آج آج ہی آ رہا ہوں۔
 میری تمہاری خدمت میں آج آج ہی آ رہا ہوں۔ میری تمہاری خدمت میں آج آج ہی
 آ رہا ہوں۔ میری تمہاری خدمت میں آج آج ہی آ رہا ہوں۔ میری تمہاری
 خدمت میں آج آج ہی آ رہا ہوں۔ میری تمہاری خدمت میں آج آج ہی آ رہا ہوں۔
 میری تمہاری خدمت میں آج آج ہی آ رہا ہوں۔ میری تمہاری خدمت میں آج آج ہی
 آ رہا ہوں۔ میری تمہاری خدمت میں آج آج ہی آ رہا ہوں۔ میری تمہاری
 خدمت میں آج آج ہی آ رہا ہوں۔ میری تمہاری خدمت میں آج آج ہی آ رہا ہوں۔

Classan Gul
 Station Writer
 Marg: A. J. Anwar
 S. No. 190/2
 33 A (A)
 Date: 10/3/1987

8/3/77
 11763040670
 ne 11763040670
 Hawadarabi
 ne 15401-823377-9
 ne 15401-0699612
 15401-620858

Alles ist wahr
 AJMAL KHAN
 High Court
 East-Camp

مفتی محمد رفیع صاحب مدظلہ العالی، مدرسہ اسلامیہ، لاہور۔
موضوع: درخواستِ رجوع بہ سابقہ منصب اور ترمیمِ رتبہ۔
تاریخ: 21-07-1951ء

۱۹۵۱ء

Passion Club
Petition Writer
Registered No. 1000/1946
NS-117-1946
33 X X 1946
Date 07/03/1987

سید محمد رفیع صاحب مدظلہ العالی

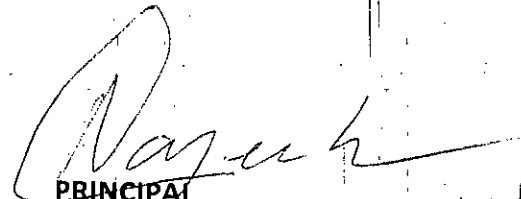
۱۹۵۱

15

Annex "H"

SERVICE CERTIFICATE

It is to certify that Mr Haroon Rashid SST (Sc;) Resident of Purana Sakhakot is teaching in GHS No 2, Sakhakot, Distt; Malakand.



PRINCIPAL
GHS NO.2, SAKHAKOT
DISTRICT MALAKAND
Principal
GHS No.2 Sakhakot
Malakand Agency

29/9/18

HAROON RASHID
SST (Sc) BPS-16
GHS # 2 Sakhakot MKD

Filed to be filed
AJMAL KHAN
High School
Bar-Council No. 12-10-0840

Auer H²



LIBRARY OF THE
U.S. DEPARTMENT OF
COMMERCE



GOVERNMENT OF PAKISTAN
ACCOUNTANT GENERAL KHYBER PAKHTUNKHWA
DISTRICT Malakand

15-A
PAYMENT ADVICE

P Sec 002 Month: July 2018
ND6056 - H. M. A. H. S. SAKHAKOT N

Pers #: 00243766 Buckle:
Name: HAROON RASHID
 SENIOR ENGLISH TEACHER
CNIC No. 11790139864

NTN:
GPH # EDUMD004195
Old #

BPS 16 Interest Applied
 16 Active Temporary

DEPT CODE ND6056

PAYS AND ALLOWANCES:

0001-Basic Pay	50,830.00
1000-House Rent Allowance	2,727.00
1560-Science Teaching Allowan	200.00
1912-Compen Allow 20% (16-N1)	1,500.00
1947-Medical Allow 15% (16-22)	2,150.00
2148-15% Adhoc Relief All-2013	1,090.00
2199-Adhoc Relief Allow @10%	814.00
2211-Adhoc Relief All 2016 10%	4,148.00
2224-Adhoc Relief All 2017 10%	5,093.00
Gross Pay and Allowances	73,635.00

DEDUCTIONS:			
IT Payable	1,100.00	Deducted	100.00
GPF Balance	43,993.00		
3501-Benevolent Fund			
3990-Emp. Edu. Fund KPK			
4004-R. Benefits & Death Comp			
TAX: (3609)			100.00
Subtr:			3,340.00
			800.00
			150.00
			1,089.00

Total Deductions

NET AMOUNT PAYABLE

5,479.00
68,156.00

QUALIFYING SERVICE
YRS MON
26 Years 02 Months

D.O.B
03.02.1967
021 Days

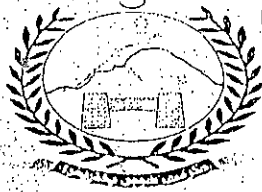
LFP Quota
NATIONAL BANK OF PAKHWP DARDA IMA AKA
PLS00000004764-3

HAROON RASHID
SST (Sc) BPS-16
GHS # 2 Sakhakot MKD

Akhtar Ali Khan
Advocate
High Court Peshawar
Bar Council No. B/10-08-10

10-27-11 1:48 PM

DEPARTMENT OF
STATE
WASHINGTON, D.C.



15

Annex 'I'

**GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT**

(REGULATION WING)

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

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

HAROON RASHID
SST (Sc) BPS-16
GHS # 2 Sakhakot MKD

HEAD MISTRESS
G.G.P.S # 2 Sakhakot
Malakand

Attest to be
AJMAL KHAN
Advocate
High Court Peshawar
Bar-Council No. 10-0840
[Signature]

AMAR

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)

RECEIVED
7/8/12

RECEIVED
7/8/12

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

SERVICE APPEAL NO. 1478/2018/

Mst Naseem Begum PSHT Govt Girl Primary School Gulo Shah

Malakand Appellant

VERSUS

1. Government of KP through The District Education Officer (Female) Elementary and Secondary Education Malakand at Batkhela
2. The Director, (Elementary and Secondary Education) Department Khyber Pakhtunkhwa Peshawar
3. District Education Officer (F) Malakand
4. Mst Hayadara, PSHT (BPS-16) GGPS Aanartangai under transfer to GGPS Sakhakot No. 2 District Malakand Respondents.

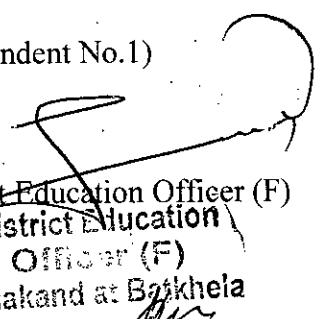
INDEX

S.No.	Description of documents	Annexure	Pages
1	Para Wise Comments	-	1-3
2	Husband Service Certificate	(A)	4
3	Domicile Certificate	(B)	5
4	Staff Statement GGPS Anartangai	(C)	6
5	Stamp Paper of House	(D)	7
6	Electricity Bill	(E)	8
7	Gas Bill	(F)	9

Deponent

CNIC No. 15402-3603873-1

(Respondent No.1)


District Education Officer (F)
District Education
Officer (F)
Malakand at Batkhela

①

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTOONKHWA
PESHAWAR**

Service Appeal No:1478/2018

Mst: Naseem Begum ,PSHT (BPS-15) GGPS Gulo Shah ,Tehsil Dargai, Distt
Malakand.

(Appellant)

VERSUS

1. The Government of Khyber Pakhtunkhwa through secretary of (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
2. The Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar
3. The District Education Officer (F) District Lower Dir.
4. Mst: Hayadara , PSHT (BPS-15) GGPS Amar Tangi under transfer to GGPS Sakhakot No.2 Tehsil Dargai, District Malakand.

(Respondents)

Para wise comments on behalf of respondents no 1,2&3:

Respectfully Sheweth
Preliminary Objections.

1. That the appeal is badly barred by time and under the rules is not maintainable.
2. That the appellant had concealed material facts from the Honorable service Tribunal.
3. That the appellant had got no cause of action to file the instant appeal.
4. That the appellant has got no locus standi to ask for claim.
5. That the appellant is estopped by his own conduct to file the present appeal.
6. That the appeal is not maintainable in its present form and is not competent.
7. That the Honorable Tribunal has no jurisdiction to entertain the appeal.
8. That the instant appeal is bad for mis-joinder/ non joinder of necessary parties.

FACTS.

1. Pertain, to record.
2. Incorrect, the appellant was not transferred to GGPS Gulo Shah but promoted To PSHT (BPS-15) dated 21.02.2013 and adjusted in adjacent Union Council (Sakhakot Badajat) She served there only five years but respondent no 4 served more than 29 years in GGPS Amar Tangi which situated in very far flung and hard area.

- 3. Correct, the post of Mst: Taj -Ul-Wara PSHT GGPS Sakhkot No.2 has been vacated on October 2018 and respondent no 4 has also been submitted her application for transfer to GPs: Sakhkot No 2 who was also the bonafide resident of sakhkot and has 29 years long stay thus her application was considered on merit.
- 4. Incorrect, respondent No. 4 is also the bonafide resident of Sakhkot (Khas) and her husband Mr.Haroon Rashid is serving in GHS No.2 Sakhkot as SST (Sc;) teacher .While respondent No.4 has 29 years long stay at GGPS Anar Tangi which situated in very far flung and hard area.
(Husband Service Certificate , Domicile Certificate, Staff Statement of GGPS Anar Tangi ,Stamp Paper of House , electricity and Gas bills of the respondent No.4 are annexed as(Annexure A,B,C,D,E,F))
- 5. Pertain to record .
- 6. The appellant had got no cause of action to file the instant appeal.

GROUND:

- a. Incorrect, the impugned orders dated 04.09.2018 issued by the respondents is according to law, facts and norms of natural justice and materials on the record showed that no violation has been made.
- b. Not admitted, Due to long stay, Spouse Policy and bonafide resident of Sakhkot Khas the impugned order dated 04.09.2018 of respondent No 4 issued which is according to law, policy, facts and norms of natural justice.
- c. Incorrect, the appellant has been treated in accordance with law by the Respondent Department and no violation have been made of the constitution of Islamic Republic of Pakistan 1973.
- d. Not admitted, the impugned order dated 4.9.2018 is according to the Transfer/Posting Regulatory Act 2011.
- e. Incorrect, No violation has been made of clause ix of the transfer/posting policy in the impugned order 4.9.2018
- f. Not admitted, after more than 29 years service away from her home station , husband and child has the fundamental right of transfer.
- g. Incorrect, the impugned order dated 04.9.2018 has been issued according to the rules and law and there is no malifide and arbitrary on the part of, respondent Department.
- h. Incorrect, No discrimination has been made by the respondent department on the subject noted above they issued impugned order dated 4.9.2018 is according to the rules, law and transfer policy.
- i. The Respondents ask seek permission to raise additional grounds at the time of arguments.

In light of the above facts it is submitted to kindly dismiss the appeal in hand with cost.

RESPONDENT NO.1

*SECRETARY (E&SE) DEPARTMENT
KHYBER PAKHTUNKHWA PESHAWAR.*

RESPONDENT NO.2

Signed on behalf of

*Director (E&SE)
KHYBER PAKHTUNKHWA PESHAWAR*

RESPONDENT NO.3

*DISTRICT EDUCATION OFFICER
(F) MALAKAND AT BATKHELA.*

(4)

718/MAS
8/3/18

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTOONKHWA
PESHAWAR

Service Appeal No:1478/2018

Mst: Naseem Begum, PSHT (BPS-15) GGPS Gulo Shah, Tehsil Dargai, Distt
Malakand.

(Appellant)

VERSUS

1. The Government of Khyber Pakhtunkhwa through secretary of (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
2. The Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar
3. The District Education Officer (F) District Lower Dir.
4. Mst: Hayadara, PSHT (BPS-15) GGPS Anar Tangi under transfer to GGPS Sakhakot No.2 Tehsil Dargai, District Malakand.

(Respondents)

Para wise comments on behalf of respondents no 1,2&3.

Respectfully Sheweth
Preliminary Objections.

1. That the appeal is badly barred by time and under the rules is not maintainable.
2. That the appellant had concealed material facts from the Honorable service Tribunal.
3. That the appellant had got no cause of action to file the instant appeal.
4. That the appellant has got no locus standi to ask for claim.
5. That the appellant is estopped by his own conduct to file the present appeal.
6. That the appeal is not maintainable in its present form and is not competent.
7. That the Honorable Tribunal has no jurisdiction to entertain the appeal.
8. That the instant appeal is bad for mis-joinder/ non joinder of necessary parties.

FACTS.

1. Pertain, to record.
2. Incorrect, the appellant was not transferred to GGPS Gulo Shah but promoted To PSHT (BPS-15) dated 21.02.2013 and adjusted in adjacent Union Council (Sakhakot Badajat) She served there only five years but respondent no 4 served more than 29 years in GGPS Anar Tangi which situated in very far flung and hard area.

- a. Incorrect, the impugned orders dated 04.09.2018 issued by the respondents is according to law, facts and norms of natural justice and materials on the record showed that no violation has been made.
- b. Not admitted, Due to long stay, Spouse Policy and bonafide resident of Sakhakot Khass the impugned order dated 04.09.2018 of respondent No.4 issued which is according to law policy, facts and norms of natural justice.
- c. Incorrect, the appellant has been treated in accordance with law by the Respondent Department and no violation have been made of the constitution of Islamic Republic of Pakistan 1973.
- d. Not admitted, the impugned order dated 4.9.2018 is according to the Transfer/Posting Regulatory Act 2011.
- e. Incorrect, No violation has been made of clause ix of the transfer/posting policy in the impugned order 4.9.2018.
- f. Not admitted, after more than 29 years service away from her home station, husband and child has the fundamental right of transfer.
- g. Incorrect, the impugned order dated 04.9.2018 has been issued according to the rules and law and there is no malafide and arbitrary on the part of respondent Department.
- h. Incorrect, no discrimination has been made by the respondent department on the subject noted above the impugned order dated 4.9.2018 is according to the rules, law and transfer policy.
- i. The Respondents ask seek permission to raise additional grounds at the time of arguments.

GROUND.

6. The appellant had got no cause of action to file the instant appeal.
5. ~~No Comments.~~ / *points to be record*
4. Incorrect, respondent No. 4 is also the bonafide resident of Sakhakot (Khass) and her husband Mr. Haroon Rashid is serving in GHS No.2 Sakhakot as SST (Sc.) teacher. While respondent No.4 has 29 years long stay at GGPS Anar Tangi which situated in very far flung and hard area. (Husband Service Certificate, Domicile Certificate, Staff Statement of GGPS Anar Tangi, Stamp Paper of House, electricity and Gas bills of the respondent No.4 are annexed as (Annexure A,B,C,D,E,F))
3. Correct, the post of Mstr. Taj-Ul-Wara PSIT GGPS Sakhakot No.2 has been vacated on October 2018 and respondent no.4 has also been submitted her application for transfer to GPs Sakhakot No 2 who was also the bonafide resident of sakhakot and has 29 years long stay thus her application was considered on merit.

In light of the above facts it is submitted to kindly dismiss the appeal in hand with cost.

RESPONDENT NO.1

SECRETARY (E&SE) DEPARTMENT
KHYBER PAKHTUNKHWA PESHAWAR.

RESPONDENT NO.2

Signed on behalf of

Director (E&SE)
KHYBER PAKHTUNKHWA PESHAWAR

RESPONDENT NO.3

DISTRICT EDUCATION OFFICER
(F) MALAKAND AT BATHHELA.

Submitted for vetting

8/3/2019

vetted subject to
corrective attachment of
all Annexures, and
affidavit

Additional Advocate General
Khyber Pakhtunkhwa
Service Tribunal Peshawar

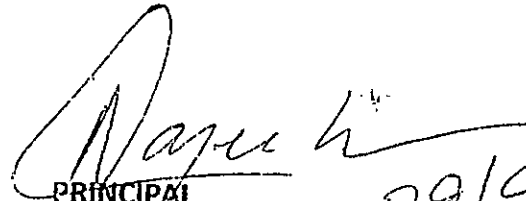
14
15
16
17

SERVICE CERTIFICATE

(4)

(A)

It is to certify that Mr Haroon Rashid SST (Sc;) Resident of
Purana Sakhakot is teaching in GHS No 2, Sakhakot, Distt; Malakand.


29/9/18

PRINCIPAL
GHS NO 2, SAKHAKOT
DISTRICT MALAKAND
Principal
GHS No. 2 - Sakhakot
Malakand

HAROON RASHID
SST (Sc) BPS-16
GHS # 2 Sakhakot MKD

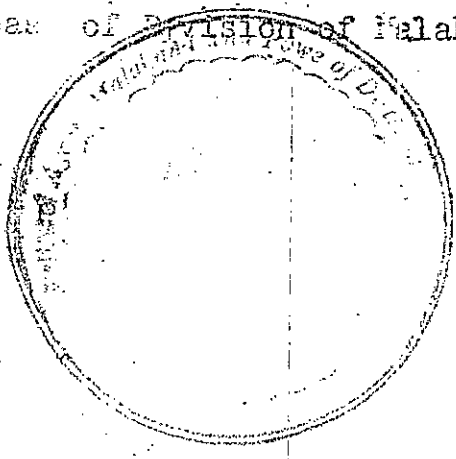
5

BENEFICIAL CERTIFICATE.

No. 557 /

Dated. 22-7 /1984

Certified that M/ Miss HEE HEE HEE son/daughter of HEE HEE HEE belong to a recognized tribe of ANJAN section ANJAN and ~~his~~/her father is a permanent bonafide resident of the tribal area of Agency of Malakand, village. HEE HEE HEE and he/she is an eligible candidate to avail ~~himself~~/herself of the seats reserved for the Special Areas of Division of Malakand Backward Areas.



Dated Malakand. 22-7 /1984

[Signature]
POLITICAL AGENT, MALAKAND

OFFICE OF THE HEAD TEACHER, GGPS/GGCMS Amanatgarhi Malakand Agency
 MONTHLY STAFF STATEMENT FOR THE MONTH OF May-2018 /2016.

S.NO	NAME	FATHER NAME	DESIG:	Personal No.	NIC No.	Qualification	BPS No	D/O Blrth	D/O 1st Applt;	D/O T/O In P/School	D/O Prom; In P/Post	Complete Home	Cell No:
						Prof/Acad						Address.	
1	Hayadara	S. Mahboob Shah	PSHT	00239873	15401-0810161-6	B.A/B.Ed	15	11-2-1965	7-12-1985	11-4-1989	21-2-2013	Purana Sankhral	0332-9460712
2	Fozia Bibi	Abdul Hassan	SPST	00243800	15401-0623353	B.A/PTK	14	1-1-1972	1-8-1992	15-2-2002	1-8-2014	Dubashah	0346-8026086
3	Haider Khan	Mehd Yaseem Khan	SPST	00251100	15401-6479019-7	B.Sc	9	20-3-1985	5-10-2016	5-10-2016		Amaylangai	0333-2872765
4												Mtd	
5													
6												Hayadara	
7													15-5-2018
8													
9													
10													
12													
13													
14													
15													
16													
17													

Signature Hayadara
 Head Mistress with Seal 15-5-2018

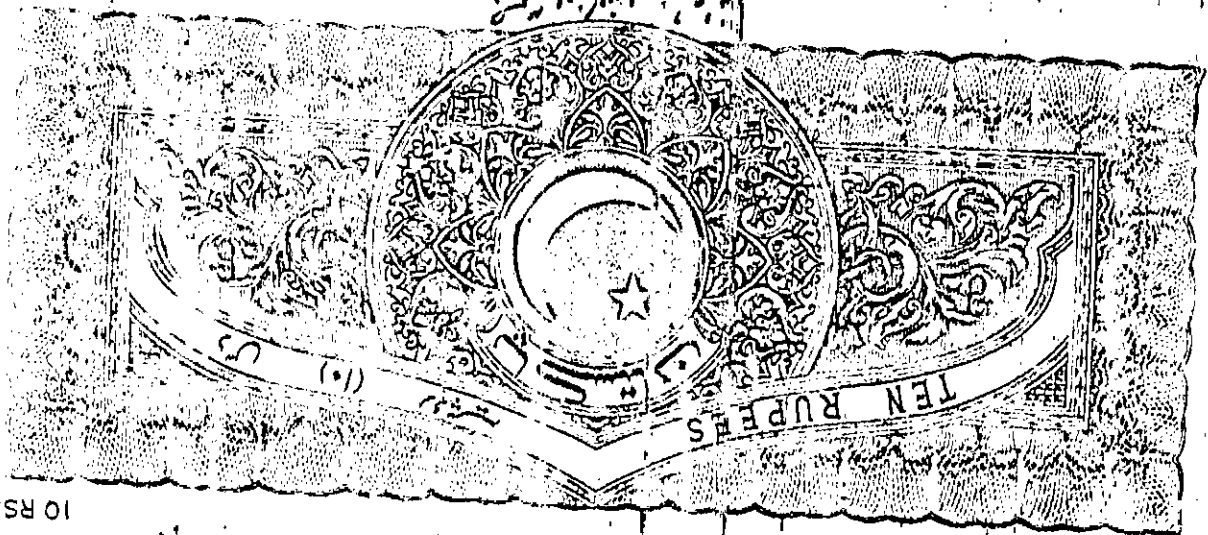
Head mistress

9

hard area.

Handwritten text in Urdu script, appearing to be a list or ledger with multiple entries. Some legible numbers include 1541620888, 1763040, and 1763040. The text is densely packed and spans most of the page's width.

Handwritten notes on the left side of the page, including the number 0311987 and other illegible characters.



PAKISTAN

10 RS

سورۃ فصطاحہ یوسف یوسف

بسم اللہ الرحمن الرحیم

الحمد لله رب العالمین والصلوٰة والسلام علی سید المرسلین

وآلہٖ الطیبین الطاهرین

اللہم صل علی محمد وعلیٰ آل محمد

صلواتک ورحمتک وبرکاتک

وسمتنا من اللہ رب العالمین

اللہم صل علی محمد وعلیٰ آل محمد

صلواتک ورحمتک وبرکاتک

وسمتنا من اللہ رب العالمین

پتھان ویلڈر

Grouped by: [unclear]

[unclear]

سیدہ ازرا تھاکر

33 X 21 cm

Date: 07/03/1997

۲۱

PESHAWAR ELECTRIC SUPPLY COMPANY - ELECTRICITY CONSUMER BILL

www.pesco.gov.pk

G.S.T # 21-00-2716-001-46

SUB-DIVISION	سب ڈویژن	BILL MONTH	بیل ماہ	READING DATE	پڑھائی تاریخ	ISSUE DATE	تاریخ اجراء	DUE DATE	تاریخ
DARGAI-I		8U	Sep '5	04 SEP 15		11 SEP 15		22 SEP 15	

REL REFERENCE No.	حوالہ نمبر	TARIFF	نرخ	LOAD	لوڈ	OLD A/C No.	پرانے اکاؤنٹ نمبر
04 26511 0323730 R		A-1A(01)		1.00			

NAME & ADDRESS	نام و پتہ	CONN. DATE	تاریخ کنکشن
HAROON RAHSHEED HIKMAT SIAH PURANA SAKHAKOT DARGAI MKD		29 DEC 12	

Incase of non attendance or non satisfaction from given complaint numbers, please contact the Electric Inspector at Benevolent Fund Building, Third Floor, near Jans Bakers, Peshawar Cantt. Tel: 091-9211343 Fax: 091-9213557

MONTH	UNITS	BILL	PAYMENT
SEP 14	226	2113	211
OCT	343	4367	436
NOV	237	309	30
DEC	142	1763	176
JAN 15	105	907	90
FEB	103	710	71
MAR	94	181	18
APR	73	279	27
MAY	89	151	15
JUN	210	1961	196
JUL	250	2317	231
AUG	291	2717	271

SAY NO TO CORRUPTION

METER No.	میٹر نمبر	PREVIOUS	مازے پڑھی	PRESENT	موجود پڑھی	MF	مف	UNITS	یونٹ	STATUS	حالت
S-P 207783		5268		5458		1		190			

TOTAL UNIT CONSUMED	کل یونٹ	TOTAL COST OF ELECTRICITY	تلاقی قیمت	METER RENT	کریم میٹر	SRVC. RENT	کرایہ سروس	INCOME TAX WITH HELD	انگوش
190		1308.90							

ELECTRICITY DUTY	7.46	INSTALMENT	قرط	BILL ADJ.	تصحیح بیل
	81.70				

PTVFT	G.S.T.	UNPAID DEBT	DEFERRED AMOUNT

CURRENT BILL	141
ARREARS/AGE	
TARIFF SUBSIDY + GST	
PAYABLE WITHIN DUE DATE	141
L.P. SURCHARGE	14
GST ON LPS	
PAYABLE AFTER DUE DATE	1558

DIVISION	DARGAI
----------	--------

Special Subsidy

Gov. P. tariff rate = 05.7900 x 100 = 557.900

Gov. P. tariff rate = 03.1100 x 90 = 279.900

For Other Complaints

بجلی پوری کی اطلاع مندرجہ ذیل نمبر پر دیں۔
Toll Free No. 0800-84338

KAKA KHAIL Communication

Ph: 311

02-09-15 08:36 Test Reader

150Hz 201

ACCLAS

آئیے! بدعنوانی کے خلاف مل کر جہاد کریں

National Accountability Bureau KP
PDA Complex, Block- III Phase - V Hayatabad Peshawar
Tel: 091-9217568, Fax: 091-9217220
E-mail: kpk@nab.gov.pk

3.00

... years out respondent no 4 served ... years in GGPS Anar Tangi which situated in very far flung and hard area.

Printed by: Art & Graphics Lahore. Fax: 042-37247166 e-mail: mr. art_graphics@netcom.com



SUI NORTHERN GAS PIPELINES LIMITED

سوی ناردرن گیس لائنز لمیٹڈ

RAJAHMUNDRAM, AP, INDIA

9

(F)

9230268

Name: KHARON RASHID S/O HIKMAT SHAH
Address: KHWAZA KHELA OLD SAKHAKOT MKD

Account ID	3826
Billing Month	Ma
Payable within due date (Rs.)	270
Due Date	05-7-20
Amount after due date (Rs.)	300
CNIC No.	

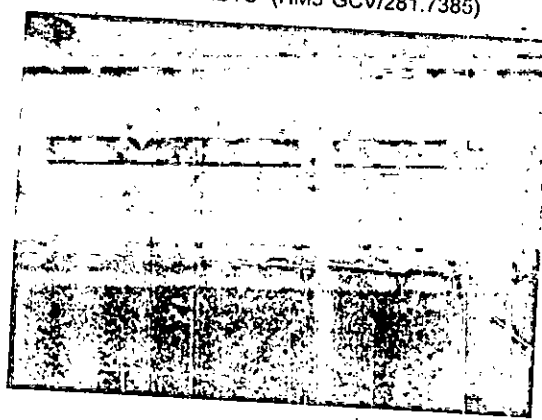
Bill ID: 382603648590
Consumer GST/NTN: /
Zone/Postal Code (Service Cycle)/Book/Page No: (8531)/ 053 / 73
Security Deposit (Cash/Bank):

DOM-G	Water Reading
Meter No. ZA1510856242	Current 00981100
	Previous 00933100
	Difference 00048000

CURRENT CHARGES

Period From To	13-05-17 to 13-06-17
Issue Date	21-06-2017
Pres./factor	1.00/1.0683
Temp./factor	1
Super Compressibility	0.0000
Gas Consumed HM3	0.513
* MMBTU	1.920
GCV	1.055
* MMBTU = (HM3 * GCV / 281.7385)	

Gas Charges	2
Prov. Bill Adjustment	
Meter Rent	
GST	
Rebate / Adjustment	
Other Charges	
Arrears / Aging	
Current Bill	1.83
Late Payment Surcharge (Rs.)	27
Total Amount Due	



PAYMENT HISTORY

Month	HM3	Current Bill	Amount Due
Apr 2017	0.705	367.53	370
Mar 2017	1.036	1,037.05	1,030
Feb 2017	1.378	1,368.02	1,370
Jan 2017	1.590	1,581.47	1,580
Dec 2016	2.090	2,074.89	2,080
Nov 2016	2.729	2,602.89	2,680
Oct 2016		79.98	80
Aug 2016		6,000.00	6,000

For energy Conservation please visit our web site www.sngpl.com.pk

قومی شناختی کارڈ کا اندراج 31 دسمبر 2017 تک ہماری ویب سائٹ پر کیا جائے۔
1199 یا قریبی گیس سروسر سنٹر پر کرنا ضروری ہے۔
دیگر آپ کو گیس کی فراہمی میں دشواری پیش آسکتی ہے۔

For Emergencies and Complaints Please Call **1199**

DOM		
Gas Rates w.e.f. 01-09-2015		
Slab	Usage of Gas in Hm3	All off-takes at flat rate of Rs. Per MMBTU
1.00	Up to 1.00	110.00
2.00	Over 1 to 3	220.00
3.00	Above 3	600.00

www.sngpl.com.pk سے بھی حاصل کیا جاسکتا ہے۔

hard area.

more than 29 years in GPS Anar Tangi which situated in very far flung and hard area.

Head Postress
GPRS Anar Tangi
Mazoon

7-8-2018

Hayadara

ASDEO (P)
Circle Zoormandi

SDEO B Daxar

Recommended to

7-8-2018

Handwritten notes in Urdu script, including dates like 1990 and 2018, and various administrative details.

Handwritten notes at the bottom of the page, including a date 1990.

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MALAKAND AT BATKHELA

OFFICE ORDER/

Consequent upon recommendation of the placement Committee and approval of the Nazim District Government Malakand for Transfers of the following Primary School Teacher (PSHT/SPSTs/PSTs) against the vacant posts are hereby ordered to the schools, noted against each their names on their own pay and scale in the interest of public service from the date of their taking over charge.

S.No	Name and Designation	From	To	Remarks
1	Lubna Kiramat PST	GGPS No.2, Khanoor	GGPS Dhad Dheri	A.V.Post
2	Salma Khurshed SPST	GGPS CC Thana	GGPS No.1 Thana	A.V.Post
3	Dilshad Begum PST	GGPS Halbat Gram	GGPS CC Thana	A.V.Post
4	Sadaf Bibi PST	GGPS Aspur (Total)	GGPS Bagh Kalli (Total)	Vice S.No.6
5	Shaheen Begum PST	GGPS Bagh Kalli (Total)	GGPS Serai (Total)	Vice S.No.8
6	Saima Ashraf PST	GGPS Naranji (Total)	GGPS Aspur	Vice S.No.5
7	Asla Bibi PST	GGPS Serai (Total)	GGPS Naranji (Total)	Vice S.No.7
8	Saima Bibi PST	GGPS Sargaro (Agra)	GGCMS Qaidara	A.V.Post
9	Sadia Wahid PST	GGPS Bardara Bala	GGPS No.1, Jalal	A.V.P.
10	Sarwat Ara PST	GGPS Maizara Thana	GGPS No.1, Thana	A.V.P.
11	Uzma PST	GGPS Gul Muqam	GGPS Darga	A.V.P.
12	Hidayara PSHT	GGPS Anar Tangal	GGPS No.2, Sakharbt	w.e. from 1.10.2018

Note:- No TADA is allowed.
Charge report should be submitted to all concerned.

(SADIA ILYAS)
DISTRICT EDUCATION OFFICER (FEMALE)
MALAKAND AT BATKHELA

Endst.No. 3707-16 / FNo.02/Transfer PST(F)/2018/Dated the 24/10/2018.


- Copy forwarded for information and necessary action to the:-
1. The Director E&SE Department Khyber Pakhtunkhwa, Peshawar.
 2. The Nazim District Government Malakand.
 3. The Deputy Commissioner Malakand.
 4. The District Monitoring Officer Malakand.
 5. The Sub Divisional Education Officer (Female) Swat Ranizai at Batkhela.
 6. The Sub Divisional Education Officer (Female) Sama Ranizai at Darga.
 7. The District Accounts Officer Malakand.

more than 29 years in GGPS Anar Tangi which situated in very far flung and hard area.

CHARGE REPORT

In compliance with transferred order issued by District Education Officer (M) Malakand at Batkhela Endst; No 3707-16 dated 04-09-2018. Mrs Hayadara PSHT BPS 15 GGPS Anar Tangai has been transferred to GGPS No 2, Sakhakot PSHT post BPS 15 & took over charge as PSHT BPS 15 post at GGPS No 2, Sakhakot, District Malakand today on 01-10-2018 (F.N).

Station GGPS No 2, Sakhakot

Signature of Relieved 
Government servant VACANT
Designation PSHT BPS 15

Dated 01/10/2018 (F.N)

Signature of Relieving Hayadara 1-10-2018
Government servant. HAYADARA
Designation PSHT BPS 15

Endst: _____ /Charge report dated GGPS No 2, Sakhakot _____ 2018.

Copy forwarded for information to :

1. The District Education Officer (M) Malakand at Batkhela.
- ~~2. The District Accounts Officer Malakand.~~
3. The Sub; Divl; Edu; Officer (F) Dargai, District Malakand.

Hayadara
HEAD MISTRESS
GGPS NO 2, SAKHAKOT
DISTRICT MALAKAND

HEAD MISTRESS
GGPS # 2 Sakhakot
Malakand

GOVERNMENT OF PAKISTAN
ACCOUNTANT GENERAL KHYBER PAKHTUNKHWA
DISTRICT Malakand
195 PAYROLL SYSTEM

PAYMENT ADVICE
P Ser: 1002 Month: July 2018
MD2052 - H. M. Q. H. S. SAKHAKOT
HEAD MASTER GHS SAKHAKOT

Pers #: 00243766 Buckle:
Name: HAROON RASHID
Senior English Teacher
CNIC No. 11790139204

NTN:
GPF #: EDUM0004195
Old #:

BPS

DEPT CODE

MD6056

PAYS AND ALLOWANCES:

- 0001-Basic Pay
- 1000-House Rent Allowance
- 1560-Science Teaching Allowan
- 1912-Compen Allow 20% (16-M1)
- 1947-Medical Allow 15% (16-22)
- 2148-15% Adhoc Relief All-2013
- 2199-Adhoc Relief Allow @10%
- 2211-Adhoc Relief All 2016 10%
- 2224-Adhoc Relief All 2017 10%

50,850.00
2,727.00
200.00
1,500.00
2,160.00
1,090.00
814.00
4,148.00
5,083.00
73,635.00

Gross Pay and Allowances
DEDUCTIONS:

- IT Payable 1,100.00 Deducted
- GPF Balance 43,993.00
- 3501-Benevolent Fund
- 3990-Emp. Edu. Fund KPK
- 4004-R. Benefits & Death Comp:

100.00

TAX: (3409)
Subtr:

100.00
3,340.00
800.00
150.00
1,089.00

Total Deductions

NET AMOUNT PAYABLE

5,479.00

68,156.00

QUALIFYING SERVICE
YRS MON
26 Years 02 Months

D.O.B
03.02.1967
021 Days

LFP Quota:
NATIONAL BANK OF PAKISTAN DARGA INA AL
PL500000004764-3

HAROON RASHID
SST/Sci BPS-16
GHS # 2 Sakhakot MKD

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Appeal No. 1478/2018

NASEEM BEGUM

VS

EDUCATION DEPTT:

REJOINDER ON BEHALF OF APPELLANT IN
RESPONSE TO THE REPLY SUBMITTED BY THE
OFFICIAL RESPONDENTS

R/SHEWETH:

(1 to 8):

All the objections raised by the respondents are in correct, baseless and not in accordance with law and rules, rather the respondents are estopped due to their own conduct to raise any objection at this stage of the appeal.

ON FACTS:

- 1- Needs no comments.
- 2- Admitted correct to the extent that the appellant was promoted to the post of PSHT (BPS-15) and posted in GGPS Gulo Shah, Union Council Sakhakot Banda Jaat vide order dated 21.02.2013. That in response to the said order the appellant submitted her charge report and started performing her duty. Furthermore, that GGPS Gulo Shah is situated/falling in union Council of Sakhakot Banda Jaat and under section-3 of the transfer/posting regulatory Act-2011 the appellant was required to serve in her own/home union council i.e. Sakhakot Khaas but inspite of that the appellant has served the above mentioned station which is situated in Union Council Sakhakot banda Jaat for more than five years.
- 3- Admitted correct to the extent of retirement of one PSHT Mst: Taj-UI-Wara has become vacant at GGPS No.2 Sakhakot Khaas while the remaining Para is incorrect. That appellant being the bonafide resident of Union Council Sakhakot Khass submitted an application before the respondent No.3 for her transfer to the said station in light of Section-3 of the Transfer/Posting Regulatory Act, 2011 of the Provincial Government of Khyber Pakhtunkhwa.
- 4- Incorrect and not replied accordingly. That the private respondent No.4 is the bonafide resident of Ghari Usmani Khel, Distrcit Malakand but inspite of knowing the fact that the respondents has transferred her to GGPS Sakhakot No.2

and ignored the application submitted by the appellant for her transfer to GGPS Sakhakot No.2 in light of Section-3 of the Transfer/posting Regulatory Act, 2011 as well as clause-IX of the transfer/posting policy.

- 5- Needs no comments.
- 6- Incorrect and misconceived hence denied.

GROUND:

- A-** All the grounds of main appeal are correct and in accordance with law and prevailing rules and that of the respondent are incorrect and baseless hence denied. That the inaction of the respondents by not transferring the appellant to her home Union Council i.e. Sakhakot Khaas is against the law, Policy, facts and norms of natural justice. That the impugned order is against the transfer/posting Regulatory Act, 2011, therefore not tenable and liable to be set aside. That the impugned order dated 04.09.2018 is violative of Clause-ix of the transfer/posting policy, hence not tenable and liable to be set aside. He the treatment meted out to the appellant is a clear violation of the Fundamental Rights of the appellant.

It is therefore, most humbly prayed that on acceptance of this rejoinder the appeal of the appellant may kindly be accepted in favor of the appellant with all back benefits.

APPELLANT


NASEEM BEGUM

THROUGH:


**NOOR MOHAMMAD KHATTAK
ADVOCATE**

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Appeal No. 1478/2018

NASEEM BEGUM

VS

EDUCATION DEPTT:

REJOINDER ON BEHALF OF APPELLANT IN
RESPONSE TO THE REPLY SUBMITTED BY THE
OFFICIAL RESPONDENTS

R/SHEWETH:

(1 to 8):

All the objections raised by the respondents are in correct, baseless and not in accordance with law and rules, rather the respondents are estopped due to their own conduct to raise any objection at this stage of the appeal.

ON FACTS:

1- Needs no comments.

2- Admitted correct to the extent that the appellant was promoted to the post of PSHT (BPS-15) and posted in GGPS Gulo Shah, Union Council Sakhakot Banda Jaat vide order dated 21.02.2013. That in response to the said order the appellant submitted her charge report and started performing her duty. Furthermore, that GGPS Gulo Shah is situated/falling in union Council of Sakhakot Banda Jaat and under section-3 of the transfer/posting regulatory Act-2011 the appellant was required to serve in her own/home union council i.e. Sakhakot Khaas but inspite of that the appellant has served the above mentioned station which is situated in Union Council Sakhakot banda Jaat for more than five years.

3- Admitted correct to the extent of retirement of one PSHT Mst: Taj-Ul-Wara has become vacant at GGPS No.2 Sakhakot Khaas while the remaining Para is incorrect. That appellant being the bonafide resident of Union Council Sakhakot Khass submitted an application before the respondent No.3 for her transfer to the said station in light of Section-3 of the Transfer/Posting Regulatory Act, 2011 of the Provincial Government of Khyber Pakhtunkhwa.

4- Incorrect and not replied accordingly. That the private respondent No.4 is the bonafide resident of Ghari Usmani Khel, Distrcit Malakand but inspite of knowing the fact that the respondents has transferred her to GGPS Sakhakot No.2

and ignored the application submitted by the appellant for her transfer to GGPS Sakhakot No.2 in light of Section-3 of the Transfer/posting Regulatory Act, 2011 as well as clause-IX of the transfer/posting policy.

5- Needs no comments.

6- Incorrect and misconceived hence denied.

GROUND:

A- All the grounds of main appeal are correct and in accordance with law and prevailing rules and that of the respondent are incorrect and baseless hence denied. That the inaction of the respondents by not transferring the appellant to her home Union Council i.e. Sakhakot Khaas is against the law, Policy, facts and norms of natural justice. That the impugned order is against the transfer/posting Regulatory Act, 2011, therefore not tenable and liable to be set aside. That the impugned order dated 04.09.2018 is violative of Clause-ix of the transfer/posting policy, hence not tenable and liable to be set aside. He the treatment meted out to the appellant is a clear violation of the Fundamental Rights of the appellant.

It is therefore, most humbly prayed that on acceptance of this rejoinder the appeal of the appellant may kindly be accepted in favor of the appellant with all back benefits.

APPELLANT


NASEEM BEGUM

THROUGH:


**NOOR MOHAMMAD KHATTAK
ADVOCATE**

KHYBER PAKHTUNKWA SERVICE TRIBUNAL, PESHAWAR

No. 112 /ST

Dated 15-01-2020


To

The District Education Officer Female,
Government of Khyber Pakhtunkhwa,
Malakand.

Subject: - JUDGMENT IN APPEAL NO. 1478/2018, MST. NASEEM BEGUM.

I am directed to forward herewith a certified copy of Judgement dated 20.12.2019 passed by this Tribunal on the above subject for strict compliance.

Encl: As above


REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.