

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR CAMP COURT D.I.KHAN.**

**SCANNED
KPST
Peshawar**

**BEFORE: KALIM ARSHAD KHAN --- CHAIRMAN
SALAH UD DIN --- MEMBER(J)**

Service Appeal No.137/2022

**Mst. Shamshad Bibi, SDEO (Female) Paharpur, Education
Department, D.I.Khan.**

.....(**Appellant**)

Versus

1. **Government of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education Department, Khyber Pakhtunkhwa Peshawar.**
2. **Chief Secretary, to government of Khyber Pakhtunkhwa Elementary & Secondary Education Department, Peshawar.**
3. **Secretary, Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.**
4. **Director Education, Department (E&SE) Khyber Pakhtunkhwa Peshawar.**
5. **District Education Officer (Female), Dera Ismail Khan.**
6. **District Education Officer (Female), Tank.**
7. **District Account Officer, D.I.Khan.**
8. **Mst. Sonia Nawaz, SDEO, (Female), Tank.**

.....(**Respondents**)

Present:

Mr. Ahmad Ali,
Advocate.....For appellant.

Mr. Muhammad Adeel Butt,
Additional Advocate General.....For official respondents.

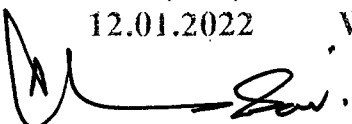
Mr. Noman Ali Bukhari,
Advocate.....For private respondent No.8

Date of Institution.....31.01.2022

Date of Hearing.....30.09.2022

Date of Decision.....30.09.2022

**APPEAL UNDER SECTION 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AIMED
AGAINST THE IMPUGNED NOTIFICATION BEARING NO.
SO (MC)/E&SED/4-16/2021/POSTING/TRANSFER/MC DATED
12.01.2022 WHEREBY THE APPELLANT WAS**



TRANSFERRED TO DISTRICT TANK, WHEREAS RESPONDENT NO.8 ON THE BASIS OF FAVOURITISM, WAS BROUGHT TO PAHARPUR, D.I.KHAN IN VIOLATION OF LAW, RULES AND POLICY IN VOGUE BY THE PROVINCIAL GOVERNMENT.

JUDGMENT

KALIM ARSHAD KHAN CHAIRMAN: Facts, to the extent necessary, are that the appellant is serving as Sub-Divisional Education Officer (SDEO) (Female) in the Education Department, Khyber Pakhtunkhwa and previously, she was posted as such at Munda, District Dir Lower vide notification dated 21.02.2019; that vide notification dated 09.08.2019, the petitioner was transferred from the post of SDEO(F) Munda Dir Lower to the post of SDEO(F) Tank; that thereafter on 07.10.2021, the appellant was transferred from the post of SDEO(F) Tank to the post of SDEO(F) Paharpur, District D.I.Khan; that, just after three months of transfer of the appellant to Paharpur, D.I.Khan, the respondents issued another impugned transfer notification dated 12.01.2022, vide which the appellant was transferred back to District Tank whereas private respondent No.8 was transferred in her place at Paharpur District D.I.Khan; that the appellant felt herself aggrieved from the order dated 12.01.2022 and filed departmental appeal, which was not responded and the appellant then filed this appeal in this Tribunal.

02. On receipt of the appeal and its admission to full hearing, the respondents were summoned, who, on putting appearance, contested the appeal by filing reply/comments mainly on the grounds that under section 10 of the Khyber Pakhtunkhwa Civil Servants Act, 1973, every civil servant was liable to serve anywhere within or outside the province; that the

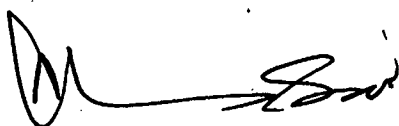


impugned order was acted upon, therefore, the appeal had rendered infructuous; that the private respondent No.8 was posted back to Paharpur on acceptance of her representation and totally on humanitarian grounds. The defence setup was a total denial of the claim of the appellant.

03. We have heard learned counsel for the appellant, learned Additional Advocate General for official the respondents and counsel for private respondent No.8.

04. Learned counsel for the appellant argued that the appellant was transferred back to the District Tank and consequent thereof respondent No.8, on the basis of favoritism, was brought back to the Paharpur D.I.Khan is against the law, rules and regulations framed there-under, thus is not maintainable and is liable to be declared void ab-initio. Learned counsel further argued that the impugned transfer order is pre-mature and against the posting/transfer policy of the Provincial Government. He contended that the impugned order is based on malafide and is due to the political victimization. At the end he requested that the impugned order is set aside the appellant might be allowed to complete her normal tenure as per policy.

05. Learned Additional Advocate General contradicted the arguments of learned counsel for the appellant and raised preliminary objection on the maintainability of the service appeal under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974. He further argued that as per Section-10 of the Khyber Pakhtunkhwa Civil Servants Act, 1973, every civil servant shall be liable to serve anywhere within or outside the province. He requested that the appeal might be dismissed with cost.



06. Learned counsel for private respondent No.8 submits that the instant appeal is not maintainable under Section-4 of the Service Tribunal Act 1974 on the ground that the statutory period of ninety days was not lapsed, hence premature which should be rejected. He further contended that the appellant has been treated in accordance with law and rules, therefore, the instant appeal is being devoid of merit might be dismissed.

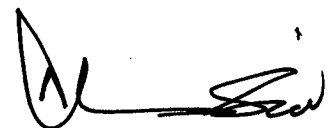
07. In order to streamline and regulate the postings and transfers of the Civil Servants, the Government of Khyber Pakhtunkhwa introduced a posting/transfer policy. Main conditions of the same relevant to the instant appeal are as under:-

i. All the postings /transfers shall be strictly in public interest and shall not be abused/misused to victimize the Government servants.

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 hard areas the tenure shall be one year. The unattractive and hard areas will be notified by the Government.

08. It is observed at the very outset that the reply of the official respondents has urged that the private respondent No.8 was transferred back on humanitarian grounds on acceptance of her departmental representation but neither such humanitarian ground was explained nor any public interest or exigency was stated in the reply of the respondents in transferring back the private respondent No.8.

09. The posting and transfer policy specifically fixes a normal tenure for the civil servants. In the case in hand it is two years but just in three months of the transfer of the appellant she was re-transferred to the previous place of posting without allowing her to complete normal tenure as per the Government's own decision found in the above policy.

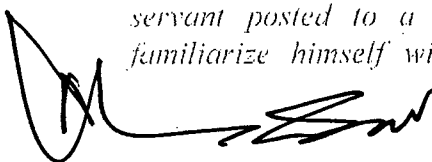


10. Tenure was originally created to give teachers academic freedom. Civil Servants do not have stability of tenure, particularly and especially in the Education Department where transfers and postings are made frequently at the whims and fancies of the executive head for political and other considerations, and not in the public interest; a fixed minimum tenure would not only enable Civil Servants to achieve their professional targets, but also help them function as effective instruments of public policy; repeated shuffling/transfer of officers is deleterious to good governance; minimum assured service tenure ensures efficient service delivery, and increased efficiency; and Civil Servants can also prioritize various social and economic measures intended to implement for the poor and marginalized sections of society.

11. In 2018 S C M R 1411 titled "Khan Muhammad Versus Chief Secretary, Government of Balochistan Quetta and others", the august Supreme Court of Pakistan was pleased to have found as under:---

"18. Under section 10 of the Act a civil servant cannot insist to be posted or transferred to a particular post but this does not mean that a civil servant can be made to serve under a subordinate. Moreover, while section 10 does not prescribe a minimum period during which a civil servant must serve at his post it does not mean that the Government without assigning any reason can move a civil servant from the place he was posted to after a month or subject the civil servant to repeated postings in a short period of time because this would amount to punishing him. Such postings also adversely affect the public interest and result in the wastage of scarce resources and constitute bad governance.

19. The Rules designate certain posts as 'tenure posts' (rule 22 read with Schedule IV of the Rules) and prescribe a period of three years for an incumbent to serve on such posts. Such prescribed tenure may therefore be categorized as the ideal duration for which a civil servant should serve at a particular post. The post of Divisional Director however is not a tenure post but the principle of serving for a particular duration at this post should be followed. In the present case the petitioner was posted for a little over a month when he was again posted. Any civil servant posted to a particular post requires some time to familiarize himself with the workings of the office and the



requirements of the post whereafter he will be best placed to acquit himself of the responsibilities of the post. However, a one month posting, as in the case of the petitioner, would not serve the interest of the people."

12. The upshot of the above discussion is that impugned order dated 07.10.2021 was not issued in public interest or exigencies of service and as such is not tenable in the eyes of law. Pre-mature transfer is clear violation of Clause I and IV of Posting and Transfer Policy notified by the provincial government. It is also violative of instructions circulated vide letter dated 27.02.2013 pertaining to tenure in posting/transfer. Ordinary tenure for posting has been specified in the law or rules made there-under, such tenure must be respected and cannot be varied, except for compelling reasons. It should be recorded in writing and are judicially reviewable.

13. As a sequel to the above, the service appeal is allowed with the directions to the respondent-department to allow the appellant to continue on her present station of posting till completion of her normal tenure. The appeal is accepted in the above term. Costs shall follow the event. Consign.

14. *Pronounced in open Court at Camp Court D.I.Khan and given under our hands and the seal of the Tribunal on this 30th day of September, 2022.*



KALIM ARSHAD KHAN

Chairman

Camp Court D.I.Khan



SALAH UD DIN

Member Judicial

Camp Court D.I.Khan.

ORDER

30th Sept, 2022

1. Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl: AG for official respondents and counsel for private respondents No. 8 present.

2. Vide our detailed judgement of today placed on file (containing 06 pages), the service appeal is allowed with the directions to the respondent-department to allow the appellant to continue on her present station of posting till completion of her normal tenure. The appeal is accepted in the above term. Costs shall follow the event. Consign.

3. *Pronounced in open court at D.I.Khan and given under our hands and seal of the Tribunal on this 30th day of September, 2022.*



(Kalim Arshad Khan)
Chairman
Camp Court D.I.Khan



(Salah Ud Din)
Member(Judicial)
Camp Court D.I.Khan

26th September, 2022

Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General alongwith Mr. Faheem Ullah, Assistant and Dr. Khalid Saeed Akbar, Litigation Officer for official respondents present. Private respondent No. 8 in person also present.

Mr. Sheikh Iftikhar-ul-Haq, learned counsel for the petitioner (Noreen Saba) submits that against the order dated 27.06.2022, whereby the petitioner Noreen Saba, was transferred to the post of SDEO (Female) Hangu, has filed a separate appeal and has requested for withdrawal of his application with further request for requisitioning of that file. Learned counsel for the appellant also sought short adjournment. The application of Noreen Saba is dismissed accordingly. The office is directed to requisition that file for the above date. To come up for arguments on 30.09.2022 before the D.B at Camp Court D.I.Khan.



(Salah Ud Din)
Member (Judicial)
Camp Court D.I.Khan

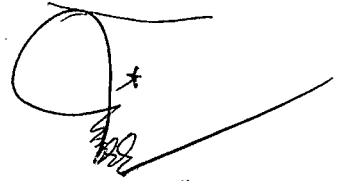


(Kalim Arshad Khan)
Chairman
Camp Court D.I.Khan

27.06.2022

Mr. Ahmad Ali Khan, Advocate for the appellant present. Mr. Muhammad Adeel Butt, Addl. AG alongwith Mr. Faheem Ullah, Assistant and Dr. Khalid Saeed Akbar, Litigation Officer for official respondents present. Mr. Nadeem Abbas Khan, Advocate present and submitted fresh Wakalantnama on behalf of private respondent No. 8 which is placed on file.

Learned counsel for the appellant submitted an application to the effect that in the wake of Notification dated 09.06.2022, fresh cause of action has accrued. Moreover, request is made for deletion of respondent No. 8 from the list of respondents. It was stated at the Bar that the case may be fixed for full-fledged arguments before the D.B. Learned counsel for private respondent No. 8 did not object. To come up for full-fledged arguments before the D.B on 01.07.2022. The operation of impugned Notification dated 12.01.2022 shall remain suspended till date fixed.



(Mian Muhammad)
Member (E)
Camp Court, D.I.Khan

1st July 2022

Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl: AG alongwith Mr. Faheem Ullah, Assistant and Dr. Khalid Saeed Akbar, Litigation Officer for official respondents and present.

Mr. Sheikh Iftikhar Ul Haq, Advocate present and submitted an application for impleadment of Noreen Saba, SDEO (F) Tank as private respondent, whereas an application for adjournment moved by private respondent No.8 which is placed on file. Learned AAG wants to submit written reply/comments on impleadment application. He may file reply within 7 days. To come up for reply on impleadment application on 25.07.2022 before S.B at Camp Court, D.I. Khan.

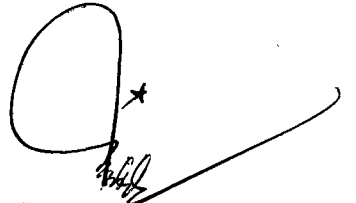


(Kalim Arshad Khan)
Chairman
Camp Court D.I.Khan

26.05.2022

Learned counsel for the appellant present. Mr. Kabirullah Khattak, Addl. AG alongwith Dr. Khalid Saeed Akbar Litigation Officer for official respondents No. 1 to 6 present. Mr. Noman Ali Bukhari, Advocate for private respondent No. 8 present.


Written reply/comments of respondent No. 1 to 6 submitted which is placed on file and copy thereof provided to learned counsel for the appellant. Learned counsel for the appellant submitted an application for transfer of the instant service ^{appeal} to Camp Court D.I Khan on the ground that all necessary parties are belonging to that area of jurisdiction. It is also evident from the order sheet dated 31.01.2022 that interim relief has been granted and the impugned Notification dated 12.01.2022 has been suspended. Being an administrative issue, it is submitted for perusal of the Honourable Chairman to decide and pass an appropriate order on the application.



(Mian Muhammad)
Member (E)

Chairman Service Tribunal

26-5-22 Be sent to D.I Khan
Bench fixed in 16
next done 27-6-22



31.01.2022

Counsel for the appellant is present. Preliminary arguments have been heard.

Learned counsel for the appellant contends that after completion of two years tenure as SDEO (F) Tank, vide notification dated 07.10.2021, she was transferred to SDEO (F) Paharpur D.I.Khan. Just after three months, she was again transferred to the post of SDEO(F) Tank and private respondent No. 8 was transferred against the post of appellant, vide impugned notification dated 12.01.2022. Learned counsel further contends that the impugned Notification is premature and against the posting/transfer policy of the Provincial Government. He further contends that the husband of appellant is serving in Elementary & Secondary Education Department as CT Teacher at District D.I.Khan, hence the impugned order is also against the Spouse Policy of the Government. Points raised need consideration. The appeal is admitted for regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments on 24.02.2022 at Camp Court D.I.Khan.

Alongwith the appeal, the appellant has also submitted an application for suspension of the operation of impugned Notification dated 12.01.2022. Notice of application be given to the respondents for the date fixed. The operation of impugned Notification dated 12.01.2022 is suspended till date fixed.

Appellant Deposited
Security & Process Fee
31/01/22




Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 137/2022

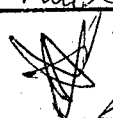
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	31/01/2022	<p>The appeal of Mst. Shamshad Bibi presented today by Mr. Khaled Mehmood Sagar Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-		<p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put there on _____.</p> <p style="text-align: right;"> CHAIRMAN</p>

**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
CHECK LIST**

Case Title: Shawad bnd vs Said ay UKK rollu

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

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

Name: Abmael Ali
 Signature: 
 Dated: 29/01/22

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

Service Appeal No. 137 of 2022

Mst. Shamshad Bibi Appellant

Versus

Government of K.P.K through
Secretary Education Department
and others Respondents

INDEX

S. No.	Description of documents	Annexures	Page #
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2	Copy of different transfer/posting Notifications of appellant	'A, B & C'	12 to 27
3	Copy of Notification dated 12.01.2022	D	28
4	Copy of Departmental Appeal dated 13.01.2022	E	29 to 31
5	Vakalatnama		32-33

Dt. 30/1/2022

Yours humble Appellant
Through Counsel



Ahmad Ali
Advocate Supreme Court

(1)

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

Service Appeal No. 137 of 2022

Mst. Shamshad Bibi, SDEO (Female) Paharpur, Education
Department, D.I.Khan.

Member (of) District Forum
(Peshawar)

Appellant Date No. 122

Versus

Dated 31-01-2022

- 3/3
1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary education Department, Khyber Pakhtunkhwa, Peshawar.
 2. Chief Secretary, to Government of Khyber Pakhtunkhwa Elementary & Secondary education Department, Peshawar
 3. Secretary, Elementary & Secondary education Department, Khyber Pakhtunkhwa, Peshawar.
 4. Director, Elementary & Secondary education Department, Khyber Pakhtunkhwa, Peshawar.
 5. District Education Officer (Female), D.I.Khan.
 6. District Education Officer (Female) Tank.
 7. District Account Officer, D.I.Khan.
 8. Mst. Sonia Nawaz, SDEO, (Female), Tank

Respondents

31/01/2022

31/01/2022

SERVICE APPEAL UNDER SECTION 4 OF THE
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
ACT, 1974 AIMED AGAINST THE IMPUGNED
NOTIFICATION BEARING NO. SO (MC)/E&SED/4-
16/2021/POSTING/TRANSFER/MC DATED 12.01.2022
WHEREBY THE APPELLANT WAS TRANSFERRED
TO DISTRICT TANK, WHEREAS RESPONDENT NO.

8, ON THE BASIS OF FAVOURTISM, WAS BROUGHT TO PAHARPUR, D.I.KHAN IN VIOLATION OF LAW, RULES AND POLICY IN VOGUE BY THE PROVINCIAL GOVERNMENT

PRAYER IN APPEAL

TO SET ASIDE/CANCEL THE IMPUGNED NOTIFICATION BEARING NO. SO (MC)/E&SED/4-16/2021/POSTING/TRANSFER/MC DATED 12.01.2022 WHEREBY THE APPELLANT WAS TRANSFERRED TO DISTRICT TANK BEING ILLEGAL, NOT SUSTAINABLE IN THE EYES OF LAW, ARBITRARY, PERVERSE, TAINTED WITH MALAFIDE AND OF NO LEGAL EFFECTS AND THE APPELLANT ALLOWED TO RESUME HER DUTY AT PAHARPUR, D.I.KHAN, TOGETHER WITH GRANT OF ANY OTHER APPROPRIATE REMEDY THAT THIS HONOURABLE TRIBUNAL MAY DETERMINE IN THE LIGHT OF RELEVANT CIRCUMSTANCES

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Note:- Addresses given above shall suffice the object of service

Respectfully Sheweth,

The appellant prefers the instant appeal on the grounds hereinafter submitted apropos the following facts.

Concise Facts

1. **That** the appellant is serving as Sub-Divisional Education Officer (Female) in the Education Department, Khyber Pakhtunkhwa and previously, she was posted as such at Munda Dir Lower vide Notification dated 21.02.2019. However, vide Notification dated 09.8.2019, the petitioner stood transferred from the post of SDEO

Munda Dir Lower to SDEO (F), Tank. Thereafter the in October 07, 2021, the appellant was transferred from the post of SDEO (F) Tank to SDEO (F) Tehsil Pahapur, District D.I.Khan. Copies of all transfers/posting Notifications of appellant are enclosed as Annexure A, B and C

2. That respondent No. 3, just within three months of the transfer of appellant to D.I.Khan, issued another impugned Notification bearing No. SO (MC)/E&SED/4-16/2021/posting/transfer/MC dated 12.01.2022 vide which the appellant was transferred back to District Tank whereas, respondent No. 8, on the basis of favoritism was transferred to the D.I.Khan. Copy of the impugned Notification bearing No. SO (MC)/E&SED/4-16/2021/posting/transfer/MC dated 12.01.2022 is enclosed as Annexure-D

9/3/

3. The under the law and policy of the provisional government, an ordinary tenure of service is minimum two years at a station and transfer of a civil servant before completion of ordinary tenure, without any legal exigency has been condemned by superior Courts of Pakistan. Thus, aggrieved of her transfer, the appellant filed a representation with the Respondents against her transfer order issued premature and in defiance of the Rules/ Instructions/ Policy of the government made and promulgated on the point. The representation remains unanswered till filing of the instant appeal due to inaction on the part of respondents. Copy of Departmental appeal/Revision dated 13.01.2022 is enclosed as (Annexure-E)

4. That disgruntled of the impugned Notification bearing No. SO (MC)/E&SED/4-16/2021/posting/transfer/MC dated 12.01.2022 whereby the appellant has been transferred back to District Tank and consequent thereof respondent No. 8, on the basis of favoritism, was brought back to the Pahapur, D.I.Khan whereby the representation preferred to respondents remains undecided, the

appellant approaches this Honourable Tribunal for redressal of her grievance on inter-alia the following grounds.

G R O U N D S

a. That the impugned Notification bearing No. SO (MC)/E&SED/4-16/2021/posting/transfer/MC dated 12.01.2022 whereby the appellant has been transferred back to district Tank and consequent thereof respondent No. 8, on the basis of favoritism, was brought back to the Paharpur, D.I.Khan is against the law, rules & regulations framed thereunder, thus is not maintainable and is liable to be declared void ab-initio. Besides, the impugned actions taken against the appellant are against the settled principles of law and the appellant has been made an escape goat, thus the impugned actions are liable to be set aside by this Honorable Tribunal.

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b. That the appellant is within her right to remain posted at Paharpur D.I.Khan in light of the policy of the Government of Khyber Pakhtunkhwa regulating transfer/posting of government servants. It is worthwhile to mention that under the law and policy of the Provincial Government, an ordinary tenure of the service is minimum two years at a station and transfer of a civil servant before completion of ordinary tenure, without any legal exigency, has been condemned by the Superior Courts of Pakistan.

c. That appellant has been made a rolling stone by official respondents just because of the fact she is not having any political backing. Besides, respondents are pressurizing the appellant to relinquish the charge of the post and handover the same to the respondent No. 8, thus, the appellant has been discriminated and victimized due to extraneous and political interference without any lawful Justification

- d. That malafide and nepotism on the part of respondents is apparent through the fact that initially they, vide notification dated 07.10.2021 transferred appellant from Tank to Paharpur, D.I.Khan whereas soon after within three months, on 12.01.2022, the said transfer has been reversed only for the benefit of respondent No. 8 despite the fact that she has already completed her tenure at Tank.
- e. That the impugned transfer order/Notification has been issued to oblige political figures of the area and therefore the same is having no legal sanctity and no worth to be maintained.
- f. That public officers and public functionaries are bound to obey the law rules procedure and being a public servant they are required to serve the public and it is not in their duties to bow before the politicians. Impugned Notification is therefore nullity in the eye of law and rights of appellant are required to be protected from the influence of political figures.
- g. That transfer of respondent No. 8 to the Paharpur, D.I.Khan is the outcome of political influence and the same was only to oblige the political figures of the area. Respondent No. 8 is having political backing while the petitioner does not and that's why petitioner is suffering a lot. The Peshawar High Court in the case reported as 2016 PLR 1468 was pleased to take serious notice of the transfer on political basis.
- h. That the petitioner has not yet completed her ordinary tenure of the service and her transfer through impugned office order is based on malafide and is due to the political victimization, and also there are no compelling circumstances for the impugned transfer of petitioner before completion of her ordinary tenure.
- i. That it has been held by the superior courts that when the ordinary tenure for a posting has been specified in the law or rules made thereunder, such tenure must be respected and cannot be varied, except for compelling reasons, which should be recorded in writing


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and are judicially reviewable. On this score too, the impugned transfer notification to the extent of appellant is liable to be held as illegal, void and tainted with malice on political basis.


- j. Counsel of the appellant may please be allowed to raise additional grounds at the time of arguments.

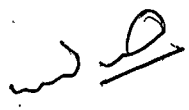
Dated: 30/1/2022

It is therefore, most humbly prayed that Service Appeal may please be allowed as prayed in the prayer clause of the instant Appeal.


 Yours humble appellant
 Through Counsel

Dated 30/1/2022


Ahmad Ali Khan
 Advocate, Supreme Court


Khalid Mehmood Sagar
 Advocate, D.I.Khan

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

Service Appeal No. _____ of 2022

Mst. Shamshad Bibi Appellant

Versus

Government of K.P.K through
Secretary Education Department
and others Respondents

SERVICE APPEAL

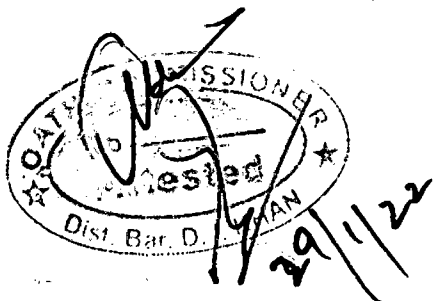
AFFIDAVIT

I, Mst. Shamshad Bibi, Sub-Divisional Education Officer (Female) the appellant,
do hereby solemnly affirm and declare on oath:-

1. That accompanying service appeal has been drafted by my Counsel following my instructions
2. That all para wise contents of the service appeal are true and correct to the best of my knowledge, belief and information;
3. That nothing has been deliberately concealed from this August Tribunal nor anything contained therein is based on exaggeration or distortion of facts.

Dated:- 30/1/2022


Deponent



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

Service Appeal No. _____ of 2022

Mst. Shamshad Bibi

Appellant

Versus


Government of K.P.K through
Secretary Education Department
and others


Respondents


SERVICE APPEAL

CERTIFICATE

Certified that this is first appeal involving the instant subject matter and that the appellant has not filed any other appeal earlier in this Honorable Tribunal regarding the above stated controversy.


Appellant
Through Counsel


Ahmad Ali Khan
Advocate Supreme Court


Khalid Mehmood Sigar
Advocate, D.I.Khan

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

Service Appeal No. _____ of 2022

Mst. Shamshad Bibi Appellant

Versus

Government of K.P.K through
Secretary Education Department
and others Respondents

MEMO OF ADDRESSES OF THE PARTIES


APPELLANT

Mst. Shamshad Bibi, Sub Divisional Education Officer (Female),
Paharpur, Education Department, D.I.Khan.

RESPONDENTS

1. **Government of Khyber Pakhtunkhwa** through Secretary Elementary & Secondary education Department, Khyber Pakhtunkhwa, Peshawar.
2. **Chief Secretary**, to Government of Khyber Pakhtunkhwa Elementary & Secondary education Department, Peshawar
3. **Secretary**, Elementary & Secondary education Department, Khyber Pakhtunkhwa, Peshawar.
4. **Director**, Elementary & Secondary education Department, Khyber Pakhtunkhwa, Peshawar.
5. **District Education Officer (Female)**, D.I.Khan.
6. **District Education Officer (Female)** Tank.
7. **District Account Officer**, D.I.Khan.
8. Mst. Sonia Nawaz, SDEO, (Female), Tank

Dated:-___/___/2022


Counsel for appellant

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

Application for interim relief in
Appeal No. _____ D of 2022

Mst. Shamshad Bibi

Vs

Govt. of Khyber Pakhtunkhwa through
Secretary Education, Peshawar and others

APPLICATION FOR SUSPENSION OF THE IMPUGNED
NOTIFICATION BEARING NO. SO (MC)/E&SED/4-
16/2021/POSTING/TRANSFER/MC DATED 12.01.2022, TO
THE EXTENT OF APPLICANT/APPELLANT, TILL FINAL
DECISION OF THE APPEAL AND IN THE MEANWHILE
RESPONDENTS MAY ALSO BE ABSTAINED FROM
TAKING ANY ACTION DETRIMENTAL TO SERVICE
CAREER OF APPELLANT.

Respectfully Sheweth,

1. That an Appeal is being filed before this Tribunal and the grounds of same may please be considered as an integral part of this application/Petition.
2. That the applicant/appellant has got a good prima facie case on law as well as on facts and there is every likelihood of the success of present appeal, hence, balance of convenience tilts in favor of the applicant/appellant.
3. That the impugned transfer Notification is the outcome of nepotism and for the favour of respondent No. 8 and on the basis of said Notification the respondents are pressurizing petitioner to relinquish the charge. Under the law and policy of the Provincial Government, an ordinary tenure of the service is minimum two years at a station and transfer of a civil servant before completion of ordinary tenure,

without any legal exigency, has been condemned by the Superior Courts of Pakistan, therefore, in case of non-grant of interim relief, the applicant/appellant will suffer an irreparable loss and the appeal would also become fruitless.

It is, therefore, humbly prayed that on acceptance of the present application/Petition as prayed for, the operation of impugned Notification bearing No. SO (MC)/E&SED/4-16/2021/Posting/Transfer/MC dated 12.01.2022 may very graciously be suspended till decision of the appeal in the interest of justice.

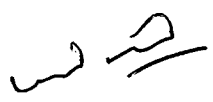
Yours Humble petitioner/appellant

Mst. Shamshad Bibi
Through Counsel



Ahmad Ali Khan
Advocate Supreme Court

Dt. 30/1/2022



Khalid Mehmood Sigar
Advocate, D.I.Khan

AFFIDAVIT

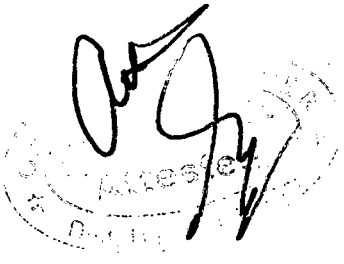
I, **Mst. Shamshad Bibi**, Sub Divisional Education Officer (Female), Education Department, D.I.Khan, the appellant, do hereby solemnly affirm and declare on oath that all the para-wise contents of above application/Petition are true and correct to the best of my knowledge, information and belief and that nothing has been deliberately concealed from this Hon'ble Court.



Identified by Counsel
Ahmad Ali Khan
Advocate Supreme Court



Deponent





GOVERNMENT OF KHYBER PAKHTUNKHWA

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

Dated Peshawar the February 21, 2019

NOTIFICATION

NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17): Consequent upon the recommendation of Departmental Promotion Committee, the Competent Authority/Chief Secretary Khyber Pakhtunkhwa is pleased to promote the following Seventy Eight (78) Assistant Sub-Divisional Education Officers/ Assistant District Education Officers (BS-16) to the post of Sub-Divisional Education Officers/ Assistant Directors (BS-17) (Management Cadre) in the Elementary & Secondary Education Department on regular basis.

2. On their promotion they are posted against the post as mentioned against each, with immediate effect:

S#	Name of Officer	Father Name	Posted as	Remarks
FEMALE				
1)	Mst. Nizakat Tabassum	Attaullah	Services placed at the disposal of Directorate of E&SE for further posting as AD.	---
2)	Mst. Meher Sani	Sikandar Khan	SDEO (F) BS-17 Khanpur Haripur	V.S#77
3)	Mst. Faheem Afshan	Mir Dad Khan	SDEO (F) BS-17 Judba Torghar	A.V.P
4)	Mst. Farhat Yasmeen	Ghulam Yaseen	SDEO (F) BS-17 Tank	A.V.P
5)	Mst. Kalsoom Begum	Shahnawaz Khan	SDEO (F) BS-17 Barikot Swat	A.V.P
6)	Mst. Samina Iftikhar	Iftikhar Ahmad	SDEO (F) BS-17 Puran Shangla	V.S#88
7)	Mst. Zahida Khanum	Haqnawaz Chauhan	SDEO (F) BS-17 Lakki Marwat	V.S#76
8)	Mst. Naila Naz	Ali Gohar	SDEO (F) BS-17 Topi Swabi	A.V.P
9)	Mst. Bibi Haleema Sadia	Muhammad Nasim	SDEO (F) BS-17 Domel Bannu	A.V.P
10)	Mst. Safia Bano	Shamshad Ali	SDEO (F) BS-17 Lahore Swabi	A.V.P
11)	Mst. Gul Farzana	Nawaz Khan	SDEO (F) BS-17 Torkhow Molkhow Chitral	A.V.P
12)	Mst. Shagufia Jabeen	Mufti Dad Khan	SDEO (F) BS-17 Ghazi Haripur	V.S#78
13)	Mst. Samia Ahmad	Bashir Ahmad Paracha	Services placed at the disposal of Directorate of E&SE for further posting as AD.	---
14)	Mst. Tahira Jabeen	Master Ghulam Rasool	SDEO (F) BS-17 Ogi Mansehra	A.V.P
15)	Mst. Nadia Begum	Inayatullah	SDEO (F) BS-17 Bakka Khel Bannu	A.V.P

ATB-121
3/3

21-02-19



GOVERNMENT OF KHYBER PAKHTUNKHWA

ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
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16)	Mst. Saima Bashir	Muhammad Bashir	SDEO (F) Hassanzai Torghar	V.S#100
17)	Mst. Nasira Jabèen	Syed Israr Hussain	SDEO (F) BS-17 Lower Tannawal Abbottabad	A.V.P
18)	Mst. Fozia Parveen	Shaukatullah	SDEO (F) Khwazakhela Swat	A.V.P
19)	Mst. Bibi Ayesha Naz	Qazi Muhammad Nawaz	SDEO (F) BS-17 Alai Battagram	V.S#86
20)	Mst. Sabira Ambreen	Ghulam Zikriya	SDEO (F) BS-17 Lal Qila Dir Lower	V.S#89
21)	Mst. Syeda Nasra Azam	Syef Ghulam Habib Shah	SDEO (F) BS-17 Jehangira Nowshera	A.V.P
22)	Mst. Noor Rahat Yaseen	Adam Khan	SDEO (F) BS-17 Lachi Kohat	V.S#101
23)	Mst. Asfia Ameen	Amin ul Haq	SDEO (Female) BS-17 Kohat	V.S#98
24)	Mst. Nancy Begum	Sher Bahadar	SDEO (F) BS-17 Swabi	A.V.P
25)	Mst. Nasim Bukhari	Maqbool Shah Bukhari	SDEO (F) BS-17 Nowshera	Already occupied
26)	Mst. Gul Raj	Feroz Khan	SDEO (F) BS-17 Town-II Peshawar	V.S#73
27)	Mst. Shahida Parveen	Mir Azam Khan	SDEO (F) BS-17 Town-IV Peshawar	V.S#1
28)	Mst. Iffat Jabeen	Wali Aman Khan	SDEO (F) BS-17 Baffa Mansehra	V.S#79
29)	Mst. Nageena Bibi	Fazal Ahmad	SDEO (F) BS-17 Havelian Abbottabad	V.S#82
30)	Mst. Surriya Taj	Muhammad Taj Khan	SDEO (F) BS-17 Battagram	V.S#81
31)	Mst. Sajida Sakhi	Sakhi Muhammad	SDEO (F) BS-17 Daraband Mansehra	A.V.P
32)	Mst. Saeeda Bano	Kala Khan	SDEO (F) BS-17 Daggar Buner	A.V.P
33)	Mst. Shabana Bibi	Saifullah Khan	SDEO (F) BS-17 Tall Hangu	A.V.P
34)	Mst. Shamshad Bibi	Gul Dar Ali Khan	SDEO (F) BS-17 Munda Dir Lower	V.S#90
35)	Mst. Musarat Jamal	Sultan Nadir Khan	SDEO (F) BS-17 Booni Chitral	A.V.P
36)	Mst. Farhat Yasmeen	Gul Abbas Khan	SDEO (F) BS-17 Karak	A.V.P
37)	Mst. Malak Taja	Muhammad Usman	SDEO (F) BS-17 Mardan	V.S#74
38)	Mst. Arifa Bibi	Afsar Ali	SDEO (F) BS-17 Sheringal Dir Upper	A.V.P
39)	Mst. Mehrun Nisa	Payo Dar Khan	SDEO (F) BS-17 Hangu	A.V.P
40)	Mst. Adeela Rani	Muhammad Nawaz Khan	SDEO (F) BS-17 Balakot Mansehra	A.V.P

Attested
W/O



GOVERNMENT OF KHYBER PAKHTUNKHWA

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

41)	Mst. Sonia Nawaz Baloch	Shah Nawaz Baloch	Services placed at the disposal of Directorate of E&SE for further posting as AD.	A.V.P
42)	Mst. Shamim Akhtar	Malik Jan	SDEO (F) BS-17 Khall Dir Lower	V.S#91
43)	Mst. Hanfia Falook	Syed Falook	SDEO (F) BS-17 Banda Daud Shah Karak	A.V.P
44)	Mst. Maryam Rasheed	Rasheed Ahmad	SDEO (F) BS-17 Pabbi Nowshera	A.V.P
45)	Mst. Naheed Fazal	Fazau Rehman	SDEO (F) BS-17 Abbottabad	V.S#84
46)	Mst. Fozia Azam	Azam Khan	Services placed at the disposal of Directorate of E&SE for further posting as AD.	---
47)	Mst. Nazia Anjum	Abdul Rahim	SDEO (F) BS-17 Palas Kohistan	V.S#83
48)	Mst. Anisa Jamsheed	Jamshed Abbassi	SDEO (F) BS-17 Lora Abbottabad	A.V.P
49)	Mst. Maryam Aman	Aman Ullah Khan	SDEO (F) BS-17 Babuzai Swat	V.S#102
50)	Mst. Nazima Shaheen	Khani Zaman	SDEO (F) BS-17 Gagra Buner	V.S#93
51)	Mst. Shazia Bibi	Muhammad Ishraf	SDEO (F) BS-17 Mandnr Buner	A.V.P
52)	Mst. Shaheen Bibi	Muhammad Aslam	SDEO (F) BS-17 Besham Shangla	V.S#95
53)	Mst. Najma Niaz	Azad Khan	Services placed at the disposal of Directorate of E&SE for further posting as AD.	---
54)	Mst. Bibi Arifa	Syed Muhammad Younas Shah	SDEO (F) BS-17 Kandare Torghar	A.V.P
55)	Mst. Shabnum Bibi	Amir Nawaz Khan	SDEO (F) BS-17 Adenzai Dir Lower	V.S#92
56)	Mst. Shahnaz Begum	Qamar Zaman	SDEO (F) BS-17 Takht-e-Nusrati Karak	Already occupied
57)	Mst. Bibi Sanam	Raja Mehboob	SDEO (F) BS-17 Khadukhel Buner	V.S#94
58)	Mst. Zeenat Begum	Sahibullah	SDEO (F) BS-17 Shabqadar Charsadda	V.S#96
59)	Mst. Nusrat Parveen	Abdul Qadar	SDEO (Female) BS-17 Torghar	A.V.P
60)	Mst. Nayyar Sultana	Muhammad Rafiq	SDEO (F) Charbagh Swat	V.S#103
61)	Mst. Shehla Naz	Sahibzada Saradar Ali	SDEO (F) BS-17 Wari Dir Upper	A.V.P
62)	Mst. Rizwana Pari	Shahdaraz Khan	Services placed at the disposal of Directorate of E&SE for further posting as AD.	---

Attested
1

14



GOVERNMENT OF KHYBER PAKHTUNKHWA

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

15

MALE

63)	Mr. Qaiser Khan	Muhammad Nawaz Khan	Services placed at the disposal of Directorate of E&SE for further posting as AD.	---
64)	Mr. Sharafuddin	Gul Nadar Khan	Services placed at the disposal of Directorate of E&SE for further posting as AD.	---
65)	Mr. Imtiaz Khan	Gul Zaman Khan	SDEO (Male) Dir Upper	A.V.P
66)	Muhammad Khitab	Gulab	SDEO (Male) Wari Dir Upper	A.V.P
67)	Mr. Bakhtzada	Mahan Gul	SDEO (Male) Larjam Dir Upper	A.V.P
68)	Mr. Zia ur Rehman	Said Rehman	Services placed at the disposal of Directorate of E&SE for further posting as AD.	---
69)	Mr. Ihtisham ul Haq	Fazal Haq	SDEO (Male) Kalkot Dir Upper	A.V.P
70)	Muhammad Saleem	Ghulam Sarwar	SDEO (Male) BS-17 Kohistan	A.V.P
71)	Mr. Sikandar Irfan	Faiz Ullah Khan	Services placed at the disposal of Directorate of E&SE for further posting as AD.	---
72)	Mr. Abdul Hafiz	Abdur Rashid	SDEO (Male) Chakisar Shangla	A.V.P

CONSEQUENTIAL TRANSFER

S#	Name of officer	Present place	Adjusted as	Remarks
73)	Mst. Firasat Mumtaz HM (BS-17)	working as SDEO (F) Town-II Peshawar	HM BS-17 GGHS Sinezo Shah Charsadda	A.V.P
74)	Mst. Rana Attaullah HM (BS-17)	working as SDEO (F) Mardan	HM BS-17 GGHS Katta Khat Mardan	A.V.P
75)	Mst. Shaheen Alam SS English (BS-17)	working as SDEO (F) Swabi	SS English BS-17 GGHS Pabini Swabi	A.V.P
76)	Mst. Tujza Abasi SS Pak Study (BS-17)	working as SDEO (F) Lakki Marwat	SS Pak Study (BS-17) S.K Bala Bannu	A.V.P
77)	Mst. Iffat Younis SS H/Civics (BS-17)	working as SDEO (F) Khanpur Haripur	SS H/Civics BS-17 GGHS Kalabat Township Haripur	A.V.P
78)	Noreen Ayaz SS Biology BS-17	working as SDEO (F) Ghazi Haripur	SS Biology BS-17 GGHS Ogi Mansehra	A.V.P
79)	Mst. Shazia Bibi SS Biology (BS-17)	working as SDEO (F) Baffa Mansehra	SS Biology BS-17 GGHS Tarangri Bala Mansehra	A.V.P
80)	Mst. Tahira Gohar SST BS-16	working as SDEO (F) Oghi Mansehra	Services placed at the disposal of DEO (F) Mansehra for further posting	---
81)	Mst. Asma Shaheen HM (BS-17)	working as SDEO (F) Battagram	HM BS-17 GGHS Batto Bandi Mansehra	A.V.P

Attesd
W.D

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GOVERNMENT OF KHYBER PAKHTUNKHWA

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

82)	Mst. Yasmin Aziz HM (BS-17)	working as SDEO (F) Havelian Abbottabad	HM BS-17 GGHS Khanaspur Ayubia Abbottabad	A.V.P
83)	Mr. Shamsul Hadi SST (BS-16)	working as SDEO (F) Palas Kohistan	Services placed at the disposal of DEO (M) Kohistan for further adjustment	---
84)	Mst. Ayesha Saeed SDEO (F) Abbottabad	SDEO (F) Abbottabad	DDEO (F) Abbottabad OPS	A.V.P
85)	Mst. Jannat Khatoon SS Islamiat (BS-17)	working as SDEO (F) Lachi Kohat	SS Islamiat (BS-17) GGHS Shakardara Kohat	A.V.P
86)	Mr. Masood Khan, HM (BS-17)	Working as SDEO (F) Alai Battagram	HM (BS-17) GHS Banna Battagram	A.V.P
87)	Mst. Noreen Saba, ASDEO (BS-16)	working as SDEO (F) Tank	Service place at the disposal of Directorate of E&SE for further posting	---
88)	Mst. Shahi Gulfam, SST (BS-16)	working as SDEO (F) Puran Shangla	Service place at the disposal of DEO (F) Shangla for further posting	---
89)	Mr. Gul Bacha, SS Islamiat (BS-17)	working as SDEO (F) Lal Qila Dir Lower	SS Islamiat (BS-17) GHSS Rehanpur Dir Lower	A.V.P
90)	Mr. Anwar Khan, ASDEO (BS-16)	working as SDEO (F) Munda Dir Lower	Service placed at the disposal of Directorate of E&SE for further posting	---
91)	Mst. Yasmin Akhtar SST (BS-16)	working as SDEO (F) Khali Dir Lower	Service placed at the disposal of DEO (F) Dir Lower	---
92)	Mst. Shakila Bano HM (BS-17)	working as SDEO (F) Adenzai Dir Lower	HM (BS-17) GGHS Inzarò Dir Lower	A.V.P
93)	Mr. Muhammad Zaib, SS Islamiat (BS-17)	working as SDEO (F) Gagra Buner	SS Islamiat (BS-17) GHSS Gagra Buner	A.V.P
94)	Mr. Khush Khawas, SS Maths (BS-17)	working as SDEO (F) Khadukhel Buner	SS Maths (BS-17) GHSS Ghurgoshto Buner	A.V.P
95)	Mst. Ghazala, Parveen, SST (BS- 16)	Working as SDEO (F) Besham Shangla	Service placed at the disposal of DEO (F) Shangla for further posting	---
96)	Mst. Shaista ASDEO (BS-16)	working as SDEO (F) Shabqadar Charsadda	Service placed at the disposal of Directorate of E&SE for further posting	---
97)	Mr. Fazli Haq ASDEO (BS-16)	working as SDEO (F) Dassu Kohistan	Service placed at the disposal of Directorate of E&SE for further posting	---
98)	Mst. Hasrat Zuhra, SDEO (BS-17)	SDEO (F) BS-17 Kohat	SDEO (Female) BS-17 Dassu Kohistan	V.S#97

Attested






GOVERNMENT OF KHYBER PAKHTUNKHWA

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

99)	Mr. Raees Khan, SDEO (BS-17)	Awaiting posting	SDEO (BS-17) Male Dagar Buner A.V.P	A.V.P
100)	Mr. Faiz-ur-Rehman, HM (BS-17)	Working as SDEO (F) Hassanzai Torghar	HM (BS-17) GHS Chansair Mansehra	A.V.P
101)	Mst. Jannat Khatoon SS Islamiat BS-17	working as SDEO (F) Lachi Kohat	SS Islamiat (BS-17) GGHSS Shakardara Kohat	A.V.P
102)	Mst. Perveen Akhtar H/M BS-17	working as SDEO (F) Babozai Swat	Principal (BS-18) GGHSS Fateh Pur Swat	A.V.P
103)	Mst. Zakia ASDEO (F) BS-16	working as SDEO (F) Charbagh Swat	Services placed at the disposal of Directorate of E&SE for further posting	---
104)	Mr. Muhammad Azam, DDEO (BS-18)	DDEO (Male) BS-18) Battagram	Services placed at the disposal of Directorate of E&SE	---
105)	Mr. Raja Babu Jehangir, SDEO (BS-17)	Working as DDEO (Male) Upper Kohistan	DDEO (Male) Battagram in OPS	V.S#104
106)	Mr. Raees-ur-Rehman, SDEO (BS-17)	Under transfer as SDEO (Male) (BS-17) Kohistan	Retained as SDEO (Male) Judba Torghar to avoid litigation in the HPHC Abbottabad, caused by the w/p against the previous order of Mr. Raees-ur-Rehman.	---
107)	Mr. Raja Sheraz Ahmad, HM (BS-17)	Working as SDEO (BS-17) Judba Torghar	DDEO (Male) Upper Kohistan in OPS	V.S#105

Attested
W/O

3. In terms of Section 6(2) of Khyber Pakhtunkhwa Civil Servant Act, 1973 read with rule-15(1) of the Khyber Pakhtunkhwa Civil Servant (Appointment, Promotion & Transfer) rules, 1989 the above named officers, on their promotion, shall be on probation for a period of one year extendable for further one year as per rules.

4. No TA/DA is allowed.

SECRETARY
E&SE Department
Khyber Pakhtunkhwa

Endst: of even No. & Date :-

Copy forwarded to the:

1. Accountant General Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, and hereby directed to furnish the proposal of posting/adjustment in r/o the Teaching Cadre officers working against the post of Management Cadre vide S#1, 13, 41, 46, 53, 62, 63, 64, 68 & 71 for further posting in pursuance of the above adjustment.



GOVERNMENT OF KHYBER PAKHTUNKHWA

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

4. District Accounts Officers Concerned.
5. PS to Chief Secretary Khyber Pakhtunkhwa, Peshawar.
6. PS to Minister E&SE Khyber Pakhtunkhwa Peshawar.
7. In-charge EMIS, E&SE Department for uploading at official website.
8. PS to Secretary E&SE Department, Khyber Pakhtunkhwa.
9. Officers concerned.
10. Office order file.

A handwritten signature in black ink, appearing to be 'M. A. S.', written over the typed name.

21-02-19

for SECTION OFFICER (SCHOOLS MALE)

Attested
[Signature]

Better Copy

B

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Government of Khyber Pakhtunkhwa
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block- "A" Opposite MPS's Hostel, Civil Secretarial Peshawar
Phone: 091-9210480, Fax # 091-9211419

NOTIFICATIONDated Peshawar August 9th, 2019

No. SO(S/F)E&SED/4-16/2019/Adjustment/MC: Consequent upon approval of the competent authority, the following Management Cadre, Assistant Sub Division Education Officers Sub Divisional Education Officers (Female) of E&SED are hereby adjusted against the mentioned posts, with immediate effect.

S#	Name of Officers	Adjustment Station	Remarks
1.	Mst. Maryam Rashid, SDEO (F) Nowhera	SDEO (F) Town-I Peshawar	AVP
2.	Mst Arifa Bibi, SDEHO (F) Sheringal Dir Upper	SDEO (F) Drosh Chitral	Vice Sr. No. 4
3.	Mst. Zubaida Kharum, SDEO (F) Chitral	SDEO (F) Drosh Chitral	Vice Sr. No. 39 town pay & scale
4.	Mst. Musarrat Jamal, SDEO (F) Turkho Mulchow Chitral	SDEO (F) Chitral	AVP
5.	Mst. Khudija Bibi, SDEO (F) Mardan	SDEO (F) Takht Bhai Mardan	Vice Sr. No. 39 town pay & scale
6.	Mst. Samina Iftikhar, SDEO (F) Shangla	SDEO (F) Katalang Mardan	AVP
7.	Mst. Shahnza Ihsan, SDEO (F) Mardan	SDEO (F) Rustam Mardan	AVP own pay & scale
8.	Mst. Dil Raj, ASDEO (F) Swabi	SDEO (F) Razzar Swabi	AVP own pay & scale
9.	Mst. Shangufta Jabeen, SDEO (F) Daggar Bunir	SDEO (F) Chota Lahore Swabi	Vice Sr. No. 36
10.	Mst. Zakia Raza, SDEO (F) Swat	SDEO (F) Babozai Swat	Vice Sr. No. 39 town pay & scale
11.	Mst. Fazilat, SDEO (F) Swat	SDEO (F) Barikot Swat	Vice Sr. No. 39 town pay & scale
12.	Mst. Saima Bibi, SDEO Babozia (F) Swat	SDEO (F) Behran Swat	Vice Sr. No. 39 town pay & scale
13.	Mst. Naheed Akhtar, SDEO (F) Swat	SDEO (F) Kabat Swat	Vice Sr. No. 39 town pay & scale
14.	Mst. Rukhsana Naz, SDEO (F) Swat	SDEO (F) Matta Swat	Vice Sr. No. 39 town pay & scale
15.	Mst. Safia, SDEO (F) Bakhtela Matakand	SDEO (F) Batkhela Malakand	Vice Sr. No. 39 town pay & scale
16.	Mst. Arifa, SDEO (F) Torghar	SDEO (F) Mansehra	AVP
17.	Mst. Sabrina Ambreen, SDEO (F) Charbagh Swat	SDEO (F) Domail Bannu	Vice Sr. No. 20
18.	Mst. Nayyar Sultana, SDEO (F) Charbagh Swat	SDEO (F) Daraban Khan D.I.Khan	AVP

Attested

19.	Mst. Sonia Nawaz Baloch, SDEO (F) Mandar Bunir	SDEO (F) Paharpura D.I.Khan	AVP
20.	Mst. Saima Bashir, SDEO (F) Domail Bannu	SDEO (F) Kulachi D.I.Khan	AVP
21.	Mst. Farhat Yasmin, SDEO (F) Charbagh Tank	SDEO (F) D.I.Khan	AVP
22.	Mst. Shamshad Bibi, SDEO (F) Munda Dir Lower	SDEO (F) Tank	AVP
23.	Mst. Nasim Begum, ASDEO (F) Balambat Dir Lower	SDEO (F) Balambat Dir Lower	AVP (own pay & scale)
24.	Mst. Yasmin Akhtar, ASDEO (F) Khaill Dir Lower	SDEO (F) Khall Dir Lower	AVP (own pay & scale)
25.	Mst. Ayesha, ASDEO Alpuri (F) Shangla	SDEO (F) Alpuri Shangla	AVP (own pay & scale)
26.	Mst. Shaista, A SDEO (F) Shabqadar Charsadda	SDEO (F) Shabqadar Charsadda	Vice Sr. No. 27 (own pay & scale)
27.	Mst. Zeenat Bibi, ASDEO (F) Shabqadar Charsadda	SDEO (F) Charsadda	AVP
28.	Mst. Shela Naz, ASDEO (F) Wari Dir Upper	SDEO (F) Tangi Charsadda	AVP
29.	Mst. Nazia Anjum (MC-BS-17) services at the disposal of Directorate of E&SE	SDEO (F) Pabbi Nowshera	AVP
30.	Mst. Nasira Naseem, ASDEO (F) Palas Kohistan	SDEO (F) Kolai Pallas Kohistan	Vice Sr. No. 34 (own pay & scale)
31.	Mst. Maryum aMAN, SDEO (F) Shabqadar Malakand	Assistant Director, Directorate of E&SE	Vice Sr. NO. 38
32.	Mst. Asfia Amin, SDEO (F) Kohat	SDEO (F) Tall Hangu	Vice Sr. NO. 33
33.	Mst. Shaista, SDEO (F) Shabqadar Charsadda	SDEO (F) Kohat	Vice Sr. NO. 32
CONSEQUENTIAL TRANSFERS			
34.	Mst. Shams-ul-Hadi, HM (BS-17) working as SDEO (F) Kolai Pallas Kohistan	Services placed at the disposal of Directorate of E&SE	-
35.	Mst. Zahida Begum, SST working as SDEO (F) Matta Swat	Services placed at the disposal of Directorate of E&SE	-
36.	Mst. Shaheen Begum, SS (BS-17) working as SDEO (F) Chota Lahore Swabi	Services placed at the disposal of Directorate of E&SE	-
37.	Mst. Shah Nazar, SDEO (F) Patten Kohistan	Services placed at the disposal of Directorate of E&SE	-
38.	Mst. Shahnaz, HM (BS-17) working as Assitant Director, Directorate of E&SE	Services placed at the disposal of Directorate of E&SE	-
39.	Mst. Rana Atta Ullah, Headmistress (BS-17) SDEO (F) Takht Bhai Mardan	Services placed at the disposal of Directorate of E&SE	-

Allesia

2. The above order will be effective subject to the condition that the officer posted in their own pay & scale will give an undertaking/ Affidavit/ on legal/ stamp paper to Secretary E&SE/ Directorate E&SE, Peshawar to the effect that they will not claim benefits of graded pay and seniority of the higher pay scale.

3. No TA/DA is allowed.

**SECRETARY
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT**

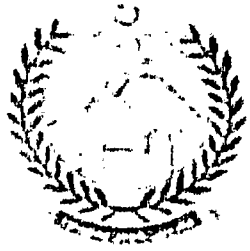
Endst: of even No. & date:

Copy forwarded to the:

1. Accountant General Khyber Pakhtunkhwa, Peshawar.
2. Director E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officers (Female) concerned.
4. District Accounts Officers concerned.
5. PS to Secretary E&SE Department.
6. In-charge EMISE, E&SE Department for uploading at official website at the earliest.
7. Officers concerned.
8. Office order file.

ALREADY
33 /

**(GUL RUKH)
Section Office (School Female)**



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

Dated Peshawar the August 9th, 2019

NOTIFICATION

No. SO(S)E&SED/4-16/2019/Adjustment/MC; Consequent upon approval of the Competent Authority, the following Management Cadre, Assistant Sub-Division Education Officers-Sub-Division of Education Officers (Female) of E&SED are hereby adjusted against the mentioned posts, with immediate effect:

Accepted

S#	Name of Officers	Adjustment Station	Remarks
1	Mst. Maryam Rashid, SDEO (F) Nowshera	SDEO (F) Town-I Peshawar	AVP
2	Mst. Aida Bibi, SDEO (F) Shergodha Upper	SDEO (F) Turko Mulkhow Chitral	Vice Sr. No. 4
3	Mst. Zubaida Khatun, ASDEO (F) Chitral	SDEO (F) Drosh Chitral	AVP (own pay & scale)
4	Mst. Musarat Jamil, SDEO (F) Turko Mulkhow Chitral	SDEO (F) Chitral	AVP
5	Mst. Khadija Bibi, ASDEO (F) Mardan	SDEO (F) Takht Bhai Mardan	Vice Sr. No. 39 (own pay & scale)
6	Mst. Samina Iftikhar, SDEO (F) Shangla	SDEO (F) Kataling Mardan	AVP
7	Mst. Shabnaz Ihsan, ASDEO (F) Mardan	SDEO (F) Rustam Mardan	AVP (own pay & scale)
8	Mst. Dil Raj, ASDEO Razzar (F) Swabi	SDEO (F) Razzar Swabi	AVP (own pay & scale)
9	Mst. Shagufta Jubeen, SDEO (F) Daggur Hunir	SDEO (F) Chota Lahore Swabi	Vice Sr. No. 36
10	Mst. Zakia Raza, ASDEO (F) Swat	SDEO (F) Babozai Swat	AVP (own pay & scale)
11	Mst. Fazilat, ASDEO (F) Swat	SDEO (F) Bariket Swat	AVP (own pay & scale)
12	Mst. Saima Bibi, ASDEO Babozai (F) Swat	SDEO (F) Behrain Swat	AVP (own pay & scale)
13	Mst. Naheed Akhtar, ASDEO (F) Swat	SDEO (F) Kabal Swat	AVP (own pay & scale)
14	Mst. Rukhsana Naz, ASDEO (F) Swat	SDEO (F) Matin Swat	Vice Sr. No. 35 (own pay & scale)
15	Mst. Safia, ASDEO (F) Barkhela Malakand	SDEO (F) Barkhela Malakand	AVP (own pay & scale)
16	Mst. Arifa, SDEO (F) Torghar	SDEO (F) Mansehra	AVP
17	Mst. Sabrina Ambreen, SDEO (F) Lal Qilla Dir Lower	SDEO (F) Domail Harnu	Vice Sr. No. 20
18	Mst. Nayyar Sultana, SDEO (F) Charbagh Swat	SDEO (F) Durbani Kadan D.I.Khan	AVP

34	Mr. Shams-ul-Hadi, HM (BS-17) working as SDEO (F) Kohat Pallas Kohistan	Services placed at the disposal of Directorate of E&SE
35	Mrs. Zahida Begum, SST working as SDEO (F) Miana Swat	Services placed at the disposal of Directorate of E&SE
36	Mrs. Shabheen Begum, SS (BS-17) working as SDEO (F) Chola Lahore Swabi	Services placed at the disposal of Directorate of E&SE
37	Mr. Shah Nazim, SDEO (F) Patten Kohistan	Services placed at the disposal of Directorate of E&SE
38	Mrs. Shahnaz Akhtar, HM (BS-17) working as Assistant Director, Directorate of E&SE	Services placed at the disposal of Directorate of E&SE
39	Mrs. Rana Aina Ullah, Headmistress (BS-17) SDEO (F) Takri Bhai Mandan	Services placed at the disposal of Directorate of E&SE

CONSEQUENTIAL TRANSFERS

30	Mrs. Nasim Naseem, ASDFO (F) Pallas Kohistan	SDEO (F) Kohat Pallas Kohistan	Vice Sr. No. 34 (own pay & scale)
31	Mrs. Maryam Aman, SDEO (F) Malakand	Assistant Director, Directorate of E&SE	Vice Sr. No. 38
32	Mrs. Asfia Amin, SDEO (F) Kohat	SDEO (F) Tall Hangu	Vice Sr. No. 33
33	Mrs. Meher-un-Nisa, SDEO (F) Tall Hangu	SDEO (F) Kohat	Vice Sr. No. 32
34	Mrs. Sheela Noz, SDEO (F) Wari Dir Upper	SDEO (F) Tangi Charsadda	AVP
35	Mrs. Nazim Anjum (AIC-BS-17) Directorate of E&SE	SDEO (F) Pabbi Nowshera	AVP
36	Mrs. Zeenat Bibi, SDEO (F) Shabqadar Charsadda	SDEO (F) Charsadda	AVP
37	Mrs. Shamina, ASDFO (F) Shabqadar Charsadda	SDEO (F) Shabqadar Charsadda	Vice Sr. No. 27 (own pay & scale)
38	Mrs. Yasmin Akhtar, ASDFO (F) Khail Dir Lower	SDEO (F) Alpur Shangla	AVP (own pay & scale)
39	Mrs. Nasim Begum, ASDFO (F) Balambar Dir Lower	SDEO (F) Balambar Dir Lower	AVP (own pay & scale)
40	Mrs. Shamsud Bibi, SDEO (F) Mandi Dir Lower	SDEO (F) Tank	AVP
41	Mrs. Farhat Yasmin, SDEO (F) Tank	SDEO (F) D.I.Khan	AVP
42	Mrs. Samra Hashir, SDEO (F) Daman Banni	SDEO (F) Kotachi D.I.Khan	AVP
43	Mrs. Samra Hashir, SDEO (F) SDEO (F) Mandar Buntir	SDEO (F) Paharpura D.I.Khan	AVP

Alloted

2. The above order will be effective subject to the condition that the officers posted in their own pay & scale will give an undertaking/ Affidavit on legal/ stamp paper to Secretary E&SE/ Directorate F&SE, Peshawar to the effect that they will not claim benefits of graded pay and seniority of the higher pay scale

3. No TADA is allowed.

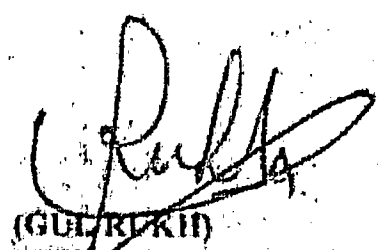
**SECRETARY
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT**

Enlist: of even No. & date:

Copy forwarded to the:

- 1 Accountant General Khyber Pakhtunkhwa, Peshawar.
- 2 Director E&SE Khyber Pakhtunkhwa, Peshawar.
- 3 District Education Officers (Female) concerned.
- 1 District Accounts Officers concerned.
- 5 PS to Secretary F&SE Department.
- 6 In-charge EMISE, E&SE Department for uploading at official website at the earliest.
- 7 Officers concerned.
- 8 Office order file.

Alleged



**(GUL RUKH)
SECTION OFFICER (SCHOOLS FEMALE)**



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

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Dated Peshawar the, October 07th, 2021

NOTIFICATION

No.SO(S/F) E&SED/4-16/2021/POSTING/TRANSFERS/MC: The Competent authority, in compliance with the decision of the Provincial Cabinet, is pleased to order the posting / transfers of the following Sub Divisional Education Officers (SDEOs BS-17) of the Elementary & Education Department, Khyber Pakhtunkhwa, in the public interest, with immediate effect: -

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

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

26

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

ANWAR
3/1
Shahzad



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

27

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

SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Endst: of Even No & date

Copy forwarded for information to the: -

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


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

Attended
20



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

28
17

Dated Peshawar the January 12th, 2022

NOTIFICATION

IO. SO(MC)E&SED/4-16/2021/POSTING/TRANSFER/MC: The Competent Authority is pleased to order the posting/transfer of the following Management Cadre officers of Elementary & Secondary Education, Khyber Pakhtunkhwa with immediate effect, in the public interest: -

Sr. No	Name & designation	From	To
1.	Mst. Shamshad Bibi (MC BS-17)	SDEO (Female) Pharpur DI Khan	SDEO (Female) Tank (Vice No-2)
2.	Mst. Sonia Nawaz (MC BS-17)	SDEO (Female) Tank	SDEO (Female) Pharpur DI Khan (Vice No-1)

SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Indst: of even No.& date:

Copy forwarded for information to the: -

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

(HAFEEZ UR-REHMAN SHAH)
SECTION OFFICER (Management Cadre)

To

The Chief Secretary,
Government of Khyber Pakhtunkhwa Peshawar.

Subject: APPEAL AGAINST THE TRANSFER ORDER DATED 12.01.2022

Respected Sir,

With profound regards and best wishes it is submitted;

1. That under signed is permanent resident of Tehsil & District Dera Ismail Khan and I am working as SDEO Management Cadre BS-17 in the E&SE Department Khyber Pakhtunkhwa Peshawar.
2. That in October 07, 2021, I was transferred from the post of SDEO (F) Tehsil & District Tank to SDEO (F) Tehsil Paharpur District DIKhan. (Annexure A)
3. That I had work as SDEO (F) Paharpur DIKhan about three months. In this tenure no complaint was logged against me before your good self. It is further added that no inquiry was logged against me in this tenure.
4. That just after three months vide Notification, the verses transfer of under signed with SDEO (F) Tehsil & District Tank was made on 12.01.2022, without any reason and the District Tank is nearly 75Km away from District DIKhan. (Annexure B)
5. This transfer Order / Notification were issued just after 03 months which is illegal, unlawful and against the law and tenure / merit policy. It is further added that as per Government Policy the tenure must be honour as I have about 03 months tenure as SDEO (F) Paharpur DIKhan.

In view of above submission it is, therefore, requested to your kind honour that kindly set aside the E&SE Department transfer Notification dated 12.01.2022 and the appellant may kindly be retained as SDEO (F) Paharpur DIKhan in the best interest of justice.

For this oblige I shall remain thankful to your good self.

Dated: 13.01.2022

Shamshad Bibi SDEO
Tehsil & District DIKhan
Cell No. 03449300316

(31)

To

Secretary to the Government of Khyber Pakhtunkhwa,
Elementary & Secondary Education Department Peshawar.

Subject: APPEAL AGAINST THE TRANSFER ORDER DATED 12.01.2022

Respected Sir,

With profound regards and best wishes it is submitted;

2. That under signed is permanent resident of Tehsil & District Dera Ismail Khan and I am working as SDEO Management Cadre BS-17 in the E&SE Department Khyber Pakhtunkhwa Peshawar.
3. That in October 07, 2021, I was transferred from the post of SDEO (F) Tehsil & District Tank to SDEO (F) Tehsil Paharpur District DIKhan. (Annexure A)
4. That I had work as SDEO (F) Paharpur DIKhan about three months. In this tenure no complaint was logged against me before your good self. It is further added that no inquiry was logged against me in this tenure.
5. That just after three months vide Notification, the verses transfer of under signed with SDEO (F) Tehsil & District Tank was made on 12.01.2022, without any reason and the District Tank is nearly 75Km away from District DIKhan. (Annexure B)
6. This transfer Order / Notification were issued just after 03 months which is illegal, unlawful and against the law and tenure / merit policy. It is further added that as per Government Policy the tenure must be honour as I have about 03 months tenure as SDEO (F) Paharpur DIKhan.

Accepted

In view of above submission it is, therefore, requested to your kind honour that appellatant may kindly be retained as SDEO (F) Paharpur DIKhan in the best interest of justice.

For this oblige I shall remain thankful to your good self.

Dated: 13.01.2022

Shamshad Bibi SDEO
Tehsil & District DIKhan
Cell No. 03449300316



SUPREME COURT
BAR ASSOCIATION
PAKISTAN

Ahmad Ali
Advocate



President

M. Aslam
Secretary

وکالت نامہ

32

کورٹ
فیس

حاجب کپک سرویس ٹریڈنگ کمپنی

مختار علی ایجوکیشنل سروسز
نام گورنمنٹ کپک

دعوی یا جرم

سرویس ایس

تفصیل دعوی یا جرم

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف واسطے بیرونی وجوہات سے کسی یا تصفیہ مقدمہ بنام
مختار علی ایجوکیشنل سروسز

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں پیشی پر خود یا ذمہ دار یا بروعدالت حاضر ہونا ضروری ہے اور ہر وقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا اگر پیشی پر مظہر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف مدد مقام پکھری کے علاوہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل بیرونی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ مدد پکھری کے علاوہ اور جگہ سماعت ہونے یا بروز تعطیل یا پکھری کے اوقات کے آگے یا پیچھے پیش ہونے پر مظہر کوئی نقصان پہنچے تو اس کے ذمہ دار یا اسکے واسطے کسی معاوضہ کے ادا کرنے یا سماعت نہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے مجھ کو نکل ساخت پر واختہ صاحب موصوف مثل کردہ ذات خود منظور قبول ہو گا اور صاحب موصوف کو عرض دعوی یا جواب دعوی یا درخواست اجراء اسمائے ذمیری نظر ثانی اپیل گرانٹی و ہر قسم درخواست ہر قسم کے بیان دینے اور پر غائی یا راضی نامہ و فیصلہ برطرف کرنے اقبال دعوی کا بھی اختیار ہو گا اور بصورت مقرر ہونے تاریخ پیشی مقدمہ مقرر ہونے از پکھری صدر بیرونی مقدمہ مقرر نظر ثانی اپیل و گرانٹی و برآمدگی مقدمہ یا منسوفی ذمیری یک طرفہ یا درخواست حکم امتناعی یا قرتی یا گرانٹی کی قبل از فیصلہ اجراء ذمیری بھی صاحب موصوف کو بشرط ادا ہونگی نتیجہ مختامیر ہی کا اختیار ہو گا اور تمام ساختہ پرواختہ صاحب موصوف مثل کردہ از خود منظور قبول ہو گا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہو گا کہ مقدمہ مقررہ یا اس کے کسی جزو کی کاروائی یا بصورت درخواست نظر ثانی اپیل گرانٹی یا دیگر معاملہ و قدمہ مذکورہ کسی دوسرے وکیل یا بیرطہ کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانون کو بھی ہر امر میں دہی اور ویسے امتیازات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر جائز التزام بنائے گا وہ صاحب موصوف کا حق ہو گا مگر صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہو گا کہ مقدمہ کی پروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا

لہذا وکالت نامہ لکھ دیا ہے تاکہ مسترد ہے
29 مورخہ 2022

مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے

Accepted by

مختار علی ایجوکیشنل سروسز

MEHMOOD MEHMOOD

Advocate
No. 15 5419

Date of issue: October 2020
Valid upto: October 2023



Secretary
KP Bar Council

وکالت نامہ

کورٹ فیس
ایک روپیہ قیمت

بعدالت جناب 1PK حضور معزز سید سجاد

منجانب اساتذہ

سید سجاد بی بی نام کو رقم 1PK

دعوی یا جرم

حضور معزز

تفصیل دعوی یا جرم

باعث غمخیز آئندہ

مقدمہ میں درج بالا معترضین اپنی طرف سے درخواست کی ہے کہ ان کو اپنی برائے پیشکش یا تصفیہ مقدمہ سے برطرف کیا جائے

ذات خود منظوریت

کو حسب ذیل شرائط پر وکیل مقرر کیا گیا۔ کہ میں ہر قسم کی خود بخود منظوریت یا برائے پیشکش یا تصفیہ مقدمہ سے برطرف کیا جائے۔ اور ہر وقت، بیکار سے جانے قدر وکیل صاحب موصوف کو اطلاع دیکر حاضر عدالت کروں گا۔ اور اگر پیشکش پر مقرر حاضر نہ ہوں اور مقدمہ میری یا غیر حاضر کی وجہ سے کسی طور پر میرے برخلاف ہو گیا۔ تو صاحب موصوف ایسے کسی طرح سے ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف، موصوف صاحب موصوف یا کبھی کے علاوہ کسی جگہ یا کبھی کے اوقات سے پہلے یا پیچھے یا بروز تعطیل بیروی کرنے کے ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف، موصوف صاحب موصوف یا کبھی کے علاوہ کسی جگہ یا کبھی کے اوقات سے پہلے یا پیچھے یا بروز تعطیل بیروی کرنے کے ذمہ دار نہ ہوں گے۔ اور مقدمہ صدر کبھی کے علاوہ اور جگہ ماحضہ ہونے یا بروز تعطیل یا کبھی کے اوقات سے پہلے یا پیچھے پیش ہونے پر مقرر کو کوئی نقصان پہنچے تو اس کے لئے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا عائد نہ واپس کرنے کے کسی موصوف، ذمہ دار نہ ہوں گے۔ بلکہ کوکل ساختہ پر داخل صاحب موصوف میں کردہ ذات خود منظوریت قبول ہوگا۔ اور صاحب موصوف کو مرضی دعویٰ یا جواب دعویٰ یا درخواست اجراء سے ڈگری و نظر ثانی اپیل گرائی و جرم درخواست پر دستخط و تصدیق کرنے یا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کرنے اور جرم کا روپیہ وصول کرنے اور سید دینے اور داخل کرنے اور جرم کے بیان دینے اور اس پر غائب یا راضی نامہ دینے اور جرم کے خلاف کرنے یا اقبال دعویٰ کا بھی اختیار ہوگا۔ اور بصورت مقرر ہونے تاریخ پیشکش مقدمہ مذکورہ ہیر دان ان کبھی صدر بیروی مقدمہ مذکورہ نظر ثانی واپس و گرائی و برآمدگی مقدمہ یا تسوی و ڈگری کی طرف یا درخواست حکم اضافی یا قریبی یا گرفتاری یا جیل اور بھلا اجراء سے ڈگری بھی صاحب موصوف کو بشرط ادا کیلیں علیحدہ علیحدہ بیروی کا اختیار ہوگا اور تمام ساختہ پر داخل صاحب موصوف میں کردہ ذات خود منظوریت قبول ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکورہ یا اسکے کسی جزو کی کاروائی یا بصورت درخواست نظر ثانی اپیل یا گرفتاری یا دیگر معاملہ مقدمہ مذکورہ کی دوسرے وکیل یا بیرٹر کو اپنے بجائے یا اپنے ہمراہ مقرر کریں۔ اور ایسے شیرتالوں کو بھی برآمدگی واپس اور ویسے اختیارات حاصل ہوں گے۔ جیسے صاحب موصوف کو حاصل ہیں، اور دوران مقدمہ میں جو کچھ ہر جائیداد بطور پرچکا، وہ صاحب موصوف کا حق ہوگا۔ مگر صاحب موصوف کو پوری نہیں تاریخ پیشکش سے پہلے ادا نہ کر دیا گا۔ تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی بیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی حکم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

ہذا وکالت نامہ کھمد یا ہے۔ تاکہ مندر ہے
مورخہ 29 مارچ 2022ء

مضمون وکالت نامہ من لیا ہے۔ اور اچھی طرح سمجھ لیا ہے۔ اور منظور ہے۔

العبد العبد العبد

مستند دلیلی - اساتذہ
Acceptance

BEFORE THE HONOURABLE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. 137/2022

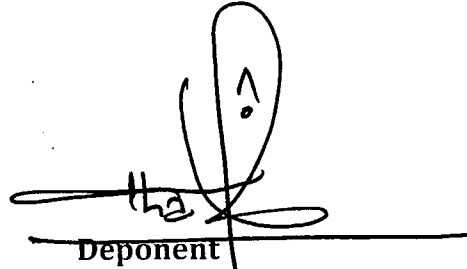
Shamshad Bibi

VS

Government of KPK

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Deponent

Dr. Khalid Saeed Akbar
Divisional Litigation Officer
Secretariat & Directorate of E&SE KP Peshawar
0343-903-3399

01

BEFORE THE HONOURABLE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. 137/22

Shamshad Bibi

VS

Government of KPK

PARA WISE COMMENTS ON BEHALF OF RESPONDENTS

Preliminary objections

- 1) That the appeal is not maintainable and incompetent in the eyes of Law in the present form.
- 2) That the appellant is estopped due to his own conduct to file this appeal.
- 3) That the appellant has got no cause of action and locus standi to file instant appeal.
- 4) That the appellant has not come to the Tribunal with clean hands and has suppressed all relevant facts.
- 5) That the appeal is bad for mis-joinder and non-joinder of necessary parties.
- 6) That the appeal filed by the Appellant is pre mature and the appellant has concealed the material facts from Honourable Tribunal.
- 7) That the Honourable Service Tribunal has no jurisdiction to entertain the instant appeal in its present form.
- 8) That the appeal has been mis-oriented, mis-constructed and mistakenly drawn and is incompetent in its present form and context, and is liable for Rejection.
- 9) That the appeal is weak having no force, fabricated, fictitious, based on ill will, malafide and having no footings in the eyes of law.
- 10) That as per Section 10 of Civil Servants Act, 1973, every Civil Servant shall be liable to serve anywhere within or outside the province.
- 11) That the Order Impugned has been acted upon and compliance has been made, therefore, the instant appeal is infructuous.
- 12) The Private Respondent has already assumed charge at the new place of duty within the stipulated time and his pay has been active from the new station of duty.
- 13) That proceeding with the instant appeal would be a futile exercise and just wastage of the precious time of this Honourable Tribunal.
- 14) That as stated in the objections supra, the appeal is bereft of cause of action and is liable for dismissal.

Respectfully Sheweth

- 1) This para pertains to the address of parties and services of appellant as SDEO BS-17 Management Cadre in the respondent department; the appellant had work as SDEO Munda Dir Lower for period of **06 months** and SDEO Tank for period of 25 months. It is further added that the appellant had worked as SDEO Paharpur DIKhan for a period more than 3 months.
- 2) Para pertains to the impugned Notification dated 12.01.2022, the appellant was transferred to the post of SDEO Tank after 3 months tenure. As appellant was transferred from Dir Lower to the Tank after her 06 months tenure and she had no objection, and now she filed present service appeal. Hence present service appeal is liable to be dismissed with cost.
 - a. Incorrect / not admitted. The Appellant is a Civil Servant and as per Section 10 of Civil Servants Act, 1973, "Any Civil Servant shall be liable to serve anywhere within or outside the province in any post under the Federal Government or any Provincial Government". It is further added that any officer can be transferred to the any post within the province or outside the province. It is not compulsory that officer may complete his tenure in a specific station; all officers of the government may be ready for posting / transfer at any time. Hence the claim of the petitioner is against the law and rule.
- 3) The private respondent No. 08 filed appeal before the respondent No. 3 against his office Notification dated 07.10.2021 and appellant was called for personal hearing. The appellant appeared before the respondent No. 3, appellant was heard personally and the respondent No. 3 was pleased to accept the appeal of respondent No. 8 on humanitarian grounds and transferred her as SDEO Paharpur District DIKhan vide Notification dated 12.01.2022 as her husband is in abroad, therefore she is responsible for look after of her family. The appellant is working as SDEO BS-17 and will be transfer to the any Sub Division being provincial cadre post. Hence appellant is not an aggrieved person and service appeal of appellant is liable to be dismissed with heavy cost. The respondent department is working under the law, supremacy of Allah Almighty; there is no political interference in the respondent department. The service appeal of the appellant is an exercise in futility. Further proceeding in this regard would bear no fruit. It is, therefore, requested to this Honourable Tribunal to dismiss the Service Appeal of the appellant with cost. **(Annexure A)**

Objections on Grounds

- b. Incorrect / not admitted. The act of the respondents was according to law, based upon the natural principle of justice. No discrimination had been made

with the present appellant. The Notification dated 12.01.2022 was according to law and policies of the government. The appellant was adjusted against the post of SDEO BS-17 (MC). It is further added that the appeal of the private respondent No. 08 was accepted by the worthy Secretary E&SE Department KP Peshawar and she was transferred to the District DIKhan as her husband is in abroad and she is responsible for look after of her kids and parents. LPC of the private respondent is annexed as **annexure B**.

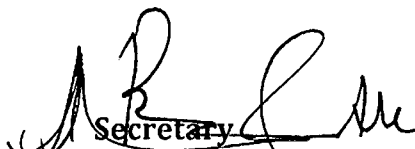
- c. Incorrect and not admitted. Strongly denied. The appellant did not have any right of posting at DIKhan or her choice station. The appellant is guzzetted officer of Class-I and may be posted / transferred anywhere in the Khyber Pakhtunkhwa hence the claim of the appellant to post him as SDEO DIKhan is against the law. The private respondent No. 08 assumed the charge of post as per order / Notification dated 12.01.2022 of the Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department. Charge assumption certificate of the private respondent No. 08 is annexed as **Annexure C**.
- d. Incorrect / not admitted. Strongly denied. The respondents department issued transfer Notification dated 12.01.2022 is in the public interest, the respondent No. 8 and appellant both were adjusted and the claim of appellant that she become a rolling stone is totally against the law, thus it is requested to this Honourable Tribunal to dismiss the present service appeal of appellant with cost.
- e. Incorrect / not admitted. The appellant was transferred to the post of SDEO (MC), the transfer of an officer is not discrimination with him. Therefore, no discrimination had been made with the present appellant. Transfer is the part of job, therefore, appellant should not have any objection on his transfer such like she was transferred from Sub-Division Munda Dir Lower to Sub-Division Tank after her **06 months** tenure only and she did not have any objection. Hence the claim of the appellant is against the law and did not sustainable in the eye of law.
- f. Incorrect, hence denied. The stance of the appellant is having no truth and is totally false and fictitious. This act of the respondents cannot be declared against the law on any ground whatsoever but the straight away rejection of present Service Appeal.
- g. Incorrect, stringy denied. The impugned order was issued in best public interest and no one was compensated rather, the appellant is interested to prolong his tenure at his choice station in-spite of past and closed transaction after assumption of charge by private respondent No. 08. The source form of appellant salary has been sent to the office of the respondent No. 07 and

respondent No. 07 had received source form in respect of appellant. (**Annexure D**)

- h. Incorrect, and denied. The Appellant was transferred in the public interest by the Competent Authority after fulfilling all legal and codal formalities; therefore, the appellant has got no cause of action or locus standi to file the present service appeal for her grievances before this Honourable Tribunal.
- i. Incorrect / not admitted. The appellant is Management Cadre Officer of the respondent department and she may be transfer to any post of Management Cadre within the Province. It is not compulsory that officer may complete his tenure in a specific station; all officers of the government may be ready for posting / transfer at any time. Hence the claim of the appellant is against the law, rule and policies of the government.
- j. Incorrect / not admitted. The Appellant is a Civil Servant and as per Section 10 of Civil Servants Act, 1973, "Any Civil Servant shall be liable to serve anywhere within or outside the province in any post under the Federal Government or any Provincial Government".
- k. The counsel for respondents may kindly be allowed to raise additional grounds at the time of arguments.

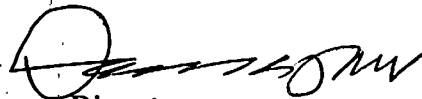
Pray

It is further requested to this Honourable Tribunal to dismiss the Service Appeal of the appellant because the Service Appeal of the appellants is only an exercise in futility as the appellant was transfer to the post of SDEO (MC) in the best public interest.



Secretary

**Elementary & Secondary Education Department
Khyber Pakhtunkhwa Peshawar
(Respondent No. 2&3)**



Director

**Elementary & Secondary Education Department
Khyber Pakhtunkhwa Peshawar**



**District Education Officer
(Female) DIKhan**



**District Education Officer
(Female) Tank**

BEFORE THE HONOURABLE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. 137/22

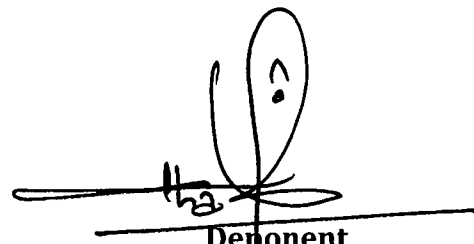
Shamshad Bibi

VS

Government of KPK

Affidavit

I, Dr. Khalid Saeed Akbar Divisional Litigation Officer for Secretariat and Directorate of Elementary & Secondary Education Department KPK Peshawar do hereby solemnly affirm and declared on oath that the contents of above mentioned service appeal are correct to the best of my knowledge and nothing has been concealed from this Honourable Tribunal.



Deponent
Dr. Khalid Saeed Akbar
12101-0899674-5
0343-903-3399



06

BEFORE THE HONOURABLE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. 137/2022.

Shamshad Bibi

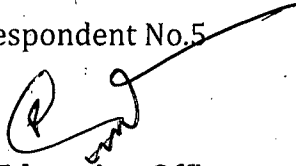
VS

Government of KPK

Authority

I, District Education Officer (F) Dera Ismail Khan Respondent No. 5 do hereby authorized Dr. Khalid Saeed Akbar Divisional Litigation Officer for Directorate and Secretrate of E & S E KPK Peshawar to attend this Honourable Service Tribunal KPK Peshawar on behalf of respondents in connection with submission of para wise comments and till the decision of the service appeal.

Respondent No.5



**District Education Officer
(Male) Dera Ismail Khan**

(7)
A

Secretary
District Tank

Subject: Appeal for the transfer to the nearest sub division in D.I. Khan district

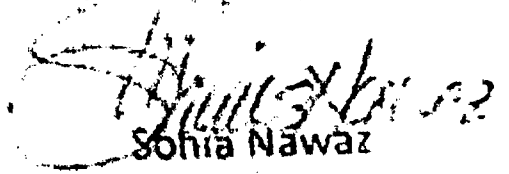
Respected Sir,

It is respectfully prayed that I may please be transferred to the nearest sub division of my home station (Sub-division Pharpur or Sub-division D.I. Khan) on the following sympathetic grounds for your kind consideration.

1. That I am facing great hardship to carry out my duties in remote areas of district Tank where I have been threatened for taking actions against absent employees in various school of the vicinity.
2. The liabilities of my children and my parents also compel me to carry out my duties in the nearest possible station as mentioned above because my elderly parents are entirely dependent on me for their daily care and diet. In case of any serious emergency my presence is of utmost importance as my husband is abroad and I have only brother who is also abroad and there is no male member to attend to any untoward situation (God forbid).
The remote station duty in Tank and daily journey has not only deteriorated my overall health but also my parents and children suffered adversely.
The language barrier is also one of the major hurdles in communication in the Pashto speaking environment.
The orders may please issued in the larger interest of my family and I may be placed in the nearest sub division of my home district D.I. Khan to look after my elderly parents and attend my kids without any hardships.

I shall be extremely grateful for accepting my appeal as I have to carry out my duties as well as my husband works in KSA and he is not around to look after all the domestic matters and my kids and parents.

Your's truly,



Sohia Nawaz

SDEO Tank

08
B
P.No:188666

OFFICE OF THE DISTRICT ACCOUNTS OFFICER TANK

No. DAO/LPC/ 1808

Dated 24.01.2022

To,

District Accounts Officer,
D.I.Khan

Subject: LAST PAY CERTIFICATE IN RESPECT OF MRS.SONIA NAWAZ SDEO F Tank

Memo:

The above name officer has been transfer to your audit jurisdiction.

She has been paid upto 12.01.2022 at the following rates:

S. No	Wage Type	Pay & Allowances	Rate	Deduction		
				Wage Type	Description	Rate
s		Basic Pay	41870 ✓		GP Fund	4270
		Conveyance Allow	6650 ✓		RB&DC	900
		Medical Allowance	1500 ✓		B. Fund	1500
		Special Allowance	6074 ✓		Income Tax	1514
		Adhoc Relief All 2013	700 ✓		EEF	250
		Adhoc Relief All 2015	478 ✓			
		Adhoc Relief All 2016	2484 ✓			
		Adhoc Relief All 2017	4187 ✓			
		Adhoc Relief All 2018	4187 ✓			
		Adhoc Relief All 2019	2093 ✓			
		Adhoc Relief All 2021	4187 ✓			
		Phd Allowance	2500 ✓			
Total			76910 ✓			8434 ✓
Net Pay						68476

She relinquishes the charge of the post on 12.01.2022.

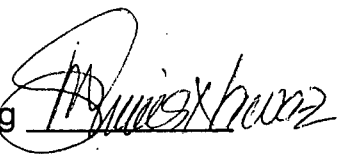
Pay Stop
with 13-01-2022
✓

[Signature]
24/01/22
District Accounts Officer
Tank

CERTIFICATE OF TRANSFER OF CHARGE.

09
C.

Certified that we have on the fore Noon on this day Dated 13/01/2022 (A.N) respectively made over charge as SDEO-F Paharpur Distt: DIKhan at sub Divisional Education Officer (F) Paharpur/ DIKhan vide Secretary to Govt: of Khyber Pakhtunkhwa E& SE Department Peshawar Notification No. SO(MC) E&ES 4-16/2021 Posting Transfer/ MC dated 12-01-2022 .

Signature of Relieving 

Govt: Servant;

SONIA NAWAZ

Designation;

SDEO (F)

Station SDEO(F) Paharpur

Dated 13-01-2022. (A. Noon)

Signature of Relieved _____

Govt: Servant;

SHAMSHAD BIBI

Designation;


SDEO (F)


Endst: No 21-26

dt: 13/1/22

Copy of above is forwarded to:-

1. The Secretary E& SE Khyber Pakhunkhwa Peshawar
2. The Director E & SE Khyber Pakhunkhwa Peshawar
3. The District Education Officer (Female) DIKhan
4. The District Monitoring Officer (DMO-IMU) DIKhan
5. The District Accounts officer DIKhan


13-1-2022
District Education Officer
(Female) Dera Ismail Khan


Sub-Div: Education Officer
(Female) Paharpur / DIKhan

Page 5

FORMPAY - 02

Date
Page No.

10/11
1 | 2 | 22

PAY ROLL SYSTEM
AMENDMENT FORM
SINGLE EMPLOYEE ENTRY

OFFICE OF THE
FOR THE MONTH OF 02/2022 1 2017

DDO Code **026216** Description

Personnel Number **070188666** Employee Name SANDIA NAJAD

National ID Card Number

(ID = 5000692)

Grade (Pay Scale Group) **17** SDEO (F)

Salary Status Start Stop

INFO Type	GENERAL DATE CHANGE	CHANGE IN PAYMENTS / DEDUCTIONS				Effective Date	Remarks
		Wage Type	Amount	Rate	Adj		
	17/7 Active					01.02.2022	Transfer for Home School
							Transfer to S.D.E.O (F) District
							Al Khaymah wide Sec. Govt
							K.P. K. No. School Sep. 2017
							At: 12/10/2022 Copy Marked
							L.P.C Coac Take Joint.
							Charge Report to me
							al Saadhaheed

[Signature]
S.D.E.O

[Signature]

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

Service Appeal No. 137/2022

Mst. Shamshad Bibi

VS

Govt of KP etc

REPLY ON BEHALF OF RESPONDENT NO.8

RESPECTFULLY SHEWETH:

Preliminary Objections:

1. The appellant has no locus standi and cause of action.
2. The appellant has not come with clean hands.
3. The appeal is time barred.
4. The appeal is not maintainable.
5. The appeal is bad for non-joinder and misjoinder of parties.
6. That according to Section-10 of the Civil Servant Act 1973 the appellant is bound to do his duty anywhere in the Province.
7. That the appellant was transferred for the reason smooth running of the deptt: it is pertinent to mentioned here but only the appellant agitate the transfer order for her ulterior motives.
8. That the appellant not facing any hardship on that transferred because both were nearby district, so the appellant failed to make out any hardship case which is necessary in case of transferred.
9. That the appellant not filed appeal under section 4 of the Service Tribunal Act 1974, the statutory period of 90 days was not lapsed, hence premature which should be rejected.

FACTS:


1. Correct all the transfer was according to law and under section-10 of the Civil Servant Act 1973.
2. Incorrect, hence denied, the appellant and replying respondent were transferred under sec10 of Civil Servant Act 1973. the appellant is bound to do his duty anywhere in the Province. The appellant was transferred for the reason smooth running of the deptt:.
3. That the Appellant was transferred under section-10 of the Civil Servant Act, 1973, wherein every civil servant is bound to serve anywhere. So, the Act shall prevail over the policy. Therefore, the impugned order of the appellant was according to law. Further the appeal of the appellant is premature under section-4 , so the same may be rejected.
4. Incorrect. As mentioned in para-3 of the reply.

GROUNDS:

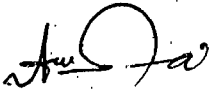

- A. Incorrect. The impugned order is according to law, facts, norms of justice and material on the record, hence not liable to be set aside.
- B. Incorrect. The order has been issued in public interest. Moreover according Section-10 of the Civil Servant Act 1973 the appellant is bound to serve anywhere in Province. So, the Act shall prevail over the policy. Therefore, the impugned order of the appellant was according to law.
- C. Incorrect and misconceived. The appellant has been treated according to law and rules by the respondent Department on the subject and as such the respondent did not violated Article-4 and-25 of the Constitution of Pakistan as according Section-10 of the Civil Servant Act 1973 the appellant is bound to serve anywhere in Province in public interest.
- D. Incorrect and misconceived, hence denied. Moreover as explained in above paras.
- E. Incorrect and misconceived, hence denied. Moreover as explained in above paras.

- F. Incorrect and misconceived, hence denied. Moreover as explained in above paras.
- G. Incorrect and misconceived, hence denied. Moreover as explained in above paras.
- H. Incorrect. The order has been issued in public interest. Moreover according Section-10 of the Civil Servant Act 1973 the appellatant is bound to serve anywhere in Province.
- I. Incorrect and misconceived, hence denied. Moreover as explained in above paras. Moreover the superior court judgment not applicable in this case., the superior court judgment also said that the transfer is internal management (administrative function) which cannot be challenged.
- J. The respondent also requested to furnished any other ground at the time of arguments.

It is, therefore, most humbly prayed that the appeal in hand may be dismissed with cost through out merit less and devoid of any legal footing.


Respondent No. 8

Through:


M. ASIF YOUSAFZAI
ADVOCATE SUPREME COURT

(SYED NOMAN ALI BUKHARI)
ADVOCATE, PESHAWAR.

AFFIDAVIT

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


DEPONENT

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

Service Appeal No. 137/2022

Mst. Shamshad Bibi

VS

Govt of KP etc

**APPLICATION FOR VACATION OF
SUSPENSION ORDER.**


RESPECTFULLY SHEWETH:

1. That the respondent no.8 has filed an reply along-with application.
2. That the respondent no.8 has good prime facie case and all the ingredients is in favour of respondent.
3. That the grounds of reply may also be considered as integral part of this application.
4. That the transfer of the respondent no.8 was made according to law. And suspension order was issued without any notice.
5. That the charge of the post was already relieve by the appellant.

It is, therefore, most humbly prayed that the suspension order may be vacated. Any other remedy, which this august tribunal deems fit that may also be awarded in favour of respondent.

Respondent No.8

Through:

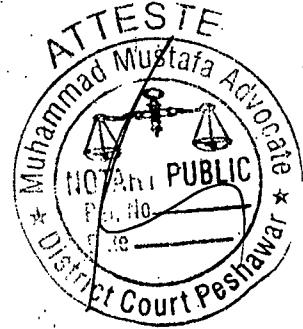

(M. ASIF YOUSAFZAI
ADVOCATE SUPREME COURT


(SYED NOMAN ALI BUKHARI)
ADVOCATE, PESHAWAR.

AFFIDAVIT:

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

DEPONENT



VAKALATNAMA

NO. _____ /20

IN THE COURT OF WP Service Tribunal, Kshara

Mst. Shamsud Bibi

Appellant
Petitioner
Plaintiff

VERSUS


Govt of K.Pet

Respondent (s)
Defendants (s)

I/WE Respondent


do hereby appoint and constitute the **SYED NOMAN ALI BUKHARI Advocate High Court** for the aforesaid Appellant(s), Petitioner(S), Plaintiff(s) / Respondent(s), Defendant(s), Opposite Party to commence and prosecute / to appear and defend this action / appeal / petition / reference on my / our behalf and all proceedings that may be taken in respect of any application connected with the same including proceeding in taxation and application for review, to draw and deposit money, to file and take documents, to accept the process of the court, to appoint and instruct council, to represent the aforesaid Appellant, Petitioner(S), Plaintiff(s) / Respondent(s), Defendant(s), Opposite Party agree(s) ratify all the acts done by the aforesaid.

DATE _____ /20



(CLIENT)

ACCEPTED


SYED NOMAN ALI BUKHARI
ADVOCATE HIGH COURT


Mo. Asif Yousafzai
Advocate Supreme Court

CELL NO: 0306-5109438


Shaukat Khan
Advocate Peshawar



NADEEM ABBAS KHAN

Advocate

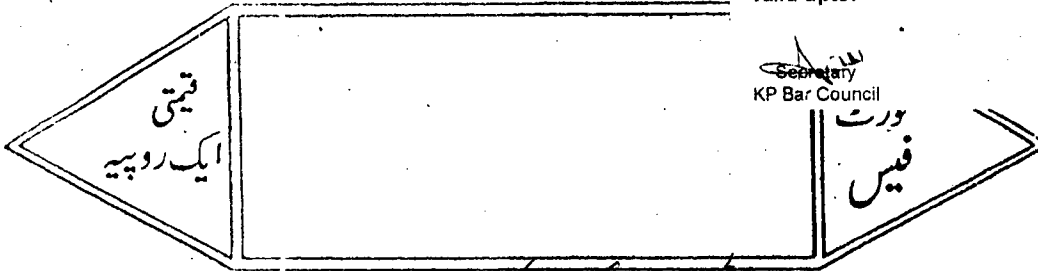
bc-11-2837

Date of issue: March 2021

Valid upto: March 2024



وکالت نامہ



حساب نمبر برائے سروس کے نام پر -

مقام: راولپنڈی
مشیر: محمد سعید سلیم
دعوی یا جرم: سروس کی وصولی
تفصیل دعوی یا جرم: سروس کی وصولی

باعث تحریر آنگہ
مقدمہ مندرجہ بالا متواں ہیں ایک طرف اور دوسری طرف برائے قلمی یا قلمی مقدمہ نمبر 106/2022

کو سب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں قلمی پر خود یا پورا بڑی رو برو عدالت حاضر ہوتا رہوں گا اور برائے ہمارے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا اگر قلمی پر مقرر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور ہرگز خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام بھکری کے علاوہ یا بھکری کے عدالت سے پہلے یا بیچے یا بروز تحلیل عدوی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ صدر مقام بھکری کے علاوہ اور جگہ ساعت ہونے یا بروز تحلیل یا بھکری کے عدالت کے آگے یا بیچے ہونے پر مقرر کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا سخت نہ دہاں کرنے کے کو صاحب موصوف ذمہ دار نہ ہو گا۔ کوئی ساختہ پر داخاتہ صاحب موصوف میں کردہ ذات خود حضور قبول ہوگا اور صاحب موصوف کو عرض دعوی یا جواب دعوی یا درخواست اجراء اس کے ذریعہ نظر رکھی اہل گمانی دہرہم درخواست برہم کے بیان دینے اور پر قلمی یا قلمی نامہ اذیت پر مقرر کرنے اقبال دعوی کا بھی اختیار ہوگا اور بصورت مقرر ہونے تاریخ قلمی مقدمہ محرور ہونے از بھکری صدر عدوی مقدمہ محرور نظر رکھی اہل گمانی دہرہم مقدمہ یا مشورتی ذریعہ ایک طرف یا درخواست عمر انتقال یا قلمی یا کرالی میں از فیض اجراء کے ذریعہ بھی صاحب موصوف کو بشرط امانتی طبعہ عاظمہ دعوی کا اختیار ہوگا اور تمام ساختہ پر داخاتہ صاحب موصوف میں کردہ از خود حضور قبول ہوگا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ محرور یا اس کے کسی جزو کی کارروائی یا بصورت عدالت نظر رکھی اہل گمانی یا دیگر معاملہ و مقدمہ مذکورہ کسی دوسرے وکیل یا دہرہم کو اپنے بجائے یا اپنے امراء مقرر کریں اور ایسے مشورتی ذریعہ کو مقرر کرنے میں اور ایسے اختیارات حاصل ہوں گے جسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو جگہ ہر زمانہ التزام پڑے گا وہ صاحب موصوف کو اپنی فیس تاریخ قلمی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو ہر اختیار ہوگا کہ مقدمہ کی عدوی نہ کریں اور اس صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

ہذا وکالت نامہ لکھ دیا ہے تاکہ سند ہے
مورخہ 27 مارچ 2022

مضمون وکالت نامہ سنایا ہے اور اجمعی طرح سمجھ لیا ہے اور منظور ہے

Accepted

محمد سعید سلیم

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

Service Appeal No. 137 of 2022

Mst. Shamshad Bibi

Vs

**Government of Khyber Pakhtunkhwa
Through Secretary Education and others**

APPLICATION FOR TRANSFER OF SERVICE APPEAL TITLED CAPTIONED ABOVE
FROM SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR
TO SERVICE TRIBUNAL, CAMP AT DERA ISMAIL KHAN

Respectfully sheweth,

1. Above noted service appeal is pending adjudication before this Hon'ble Tribunal and is fixed for tomorrow i.e. 26.5.2022 at Service tribunal Khyber Pakhtunkhwa Peshawar.
2. That the parties belong to district Dera Ismail Khan and it is rather impossible for the appellant to pursue her case at Peshawar and as service career of appellant is at stake, therefore, the same cannot be left in vacuum but at the same time the case cannot be pursued by the appellant freely.
3. That in the interest of justice this Honourable Tribunal has got vast powers under the law to meet the ends of justice, as there are so many reported judgments, wherein the case have been transferred from one District to another because of the peculiar circumstances.
4. That the law requires a peaceful opportunity to every litigant to pursue his case, even otherwise the appellant of the service appeal pending before this Honourable Tribunal and the private respondent are also permanent resident of the

area which do fall within the territorial jurisdiction of Dera Ismail Khan.

5. That in the interest of justice and for the purpose of ease of the parties, the service appeal captioned above needs to be decided by service tribunal camp at Dera Ismail Khan than that of this Hon'ble Tribunal at Peshawar.

It is, therefore, humbly prayed that keeping in view the above facts and circumstances, this Honourable Tribunal may very graciously be pleased to order the transfer the ibid Service Appeal from this Honourable Tribunal, Peshawar to camp at Dera Ismail Khan in the interest of justice.

Your Humble appellant

Dated: 25/5/2022

(Shamshad Bibi)
SDEO (Female),
Education Department, D.I.Khan

AFFIDAVIT

I, Mst. Shamshad Bibi, SDEO (Female) Paharpur, Education Department, D.I.Khan the appellant, do hereby solemnly on oath that the contents of this petition are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.



(Shamshad Bibi)
SDEO (Female),
Education Department, D.I.Khan

BEFORE THE SERVICE TRIBUNAL
CAMP COURT DERA ISMAIL KHAN

Appeal: 137/2022

SHAMSHAD BIBI

VS

GOVT OF KPK

INDEX

No	Particulars	Annexure	Pages
1	Application for impalement on behalf of Noreen Saba & affidavit		1-3
2	Copy of the notification dt: 30.05.22	I	4
3	Copy of the notification dt: 10.06.22	II	5
4	Copy of the Joining Report	II/1	6
5	Copy of the notification dt: 27.06.22	III	7
6	Copy of the letter dt: 09.06.22 I/R unethical attitude along with 09.06.22 letter	IV	8-9
7	Application for suspension		10-11
8	Wakalatnama		12

Deponent / Applicant

F. C.
in witness
Sh. Af. Khan ulha

(1)

1

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR CAMP COURT D.I.KHAN

CM Petition No. _____/2022

In Service Appeal No. 137 of 2022

Shamshad Bibi

Vs.

Govt. of Khyber Pakhtunkhwaw & others

Service Appeal

APPLICATION FOR IMPLEADMENT OF NOREEN SABA SDEO (F) TANK IN THE ARRAY OF RESPONDENT IN THE ABOVE TITLED SERVICE APPEAL.

Respectfully Sheweth;

Petitioner humbly submits as under,

1. That the above titled service appeal is pending adjudication before this honourable Tribunal and is fixed for 01/07/2022.
2. That the petitioner was promoted to SDEO (F) post and adjusted at SD Harban Bashah Kohistan Upper vide notification No. SO (MC)E&SED/4-16/2022/MC 17/Promotion dated 30/05/2022. Copy of notification is marked as **I**.
3. That pro corrigendum notification vide SO-MC&SED/4-16/2022/Posting/Transfer/MC dated 10/06/2022 the service of the petitioner was placed at SDEO (F) Tank against the vacant post by the respondents/authority. Copy of notification is annexed as **Annexure-II**.
4. Thereafter the petitioner after posting at Tank joined the service/taken the charge at fresh posting place on 11/06/2022. *The same is enclosed as Annexure III*
5. That thereafter the petitioner was once again transferred from Tank to SDEO (F) Hangu on 27/06/2022 vide SO(MC)E&SED/4-16/2022/Posting/Transfer/ MC dated

in list

27/06/2022. Copy of notification is annexed as **Annexure-III**.

6. That it is pertinent to mention here that due to unethical attitude of SDEO Tank (Sonia Nawaz private respondent#8) was directed to report to Directorate of Elementary & Secondary Education KPK, Peshawar at serious complaints were made against them by the District Education Office (F) Tank due to which the said post had been become vacant and the petitioner was posted at the said station i.e. SDEO (F) Tank. But later on again on 27/06/2022 the petitioner was transferred to Hangu. Copies of the record in this respect are annexed as **Annexure-IV**.
7. That that the petitioner is aggrieved by the aforesaid order, therefore, being a necessary party be impleaded in the array of private respondents.
8. That the petitioner has not completed the tenure on the fresh station as after some time has been transferred.
9. That on 27/06/2022 counsel for the private respondent#8 (Sonia Nawaz) misguided the Tribunal by concealing the facts.
10. That in such like situation this honourable Tribunal has got the vast powers to entertains the application in hand.
11. That counsel for the petitioner may please be allowed to raise additional grounds at the time of arguments.

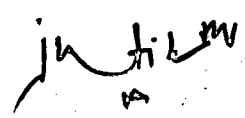
It is, therefore, humbly prayed that the instant application may please be accepted as prayed per subject and contents.

June 30, 2022

Humble Applicant


Noreen Saba

Through Counsel
Sheikh Iftikhar ul Haq
Advocate High Court

→ 

3

**BEFORE THE SERVICE TRIBUNAL
CAMP COURT DERA ISMAIL KHAN**

Service Appeal: 137/2022

SHAMSHAD BIBI

VS

GOVT OF KPK

AFFIDAVIT

I, **Noreen Saba** daughter of Abdul Sattar R/O of TAnk , do hereby solemnly affirm & declare on oath that all the contents of Petition are true and correct to the best of my knowledge & belief. Nothing has been kept concealed from this Honorable Court.

N Saba
Deponent -
12201-1832085-0



*Identified by
in file
Sh. Officer all
35/06
022*

4

Ann- '1'



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091 922 1585

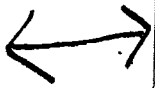
Dated Peshawar the May 30th, 2022

NOTIFICATION

NO.SO(MC)E&SED/4-16/2022/PT/MC-17/PROMOTION: Consequent upon their promotion to the post of SDEOs / Assistant Directors (Male & Female MC BS-17) notified vide Notification No.SO(PE)/E&SED/2-6/DPC-Meeting/ADEOs(M&F) dated 18-05-2022, the following posting/transfers/adjustment are hereby notified with immediate effect, in the best public interest: -

S#	Name of officers & designation	Place of posting
MALE		
1.	Muhammad Hussain (MC BS-17)	SDEO (Male) Gumbat, Kohat (AVP)
2.	Muhammad Asif Khan (MC BS-17)	SDEO (Male) Pattan, Kohistan Lower (AVP)
3.	Mr. Attaullah Shah (MC BS-17)	SDEO (Male) Ghazi Haripur (Vice Sr. No-4)
4.	Mr. Wali Muhammad Khan (MC BS-17)	SDEO (Male) Gagra, District Buner (AVP)
5.	Mr. Said Zamin Shah (MC BS-17)	SDEO (Male) Nawagai, District Bajaur (AVP)
6.	Mr. Umar Farooq (MC BS-17)	SDEO (Male) Daggar, District Buner (AVP)
7.	Syed Ihsanullah Shah (MC BS-17)	SDEO (Male) Town-I Peshawar (Vice Sr. No-8)
8.	Mr. Ziaullah (MC BS-17) SDEO (Male) Town-I Peshawar.	SDEO (Male) Dara Adam Khel Kohat (AVP)
9.	Mr. Imtiaz Ali (MC BS-17)	SDEO (Male) Lower Mohmand (AVP)
10.	Mr. Iftikhar Ali Khan (MC BS-17)	SDEO (Male) Upper Mohmand (AVP)
11.	Mr. Pir Muhammad (MC BS-17)	SDEO (Male) Wari, Dir Upper (AVP)
12.	Mr. Sakin Shah (MC BS-17)	Assistant Director, Directorate of E&SE (AVP)
13.	Mr. Iran Gul (MC BS-17)	SDEC (Male) Wana, South Waziristan (AVP)
14.	Mr. Tahir Ahmad (MC BS-17)	SDEO (Male) Mirali, North Waziristan (AVP)
15.	Mr. Zahir Qamar (MC BS-17)	SDEO (Male) Lower Orakzai (AVP)
16.	Mr. Ajeeb Ullah (MC BS-17)	SDEO (Male) Sheringale, Dir Upper (AVP)
17.	Mr. Wali ur Rehman (MC BS-17)	SDEO (Male) Alai Battagram (AVP)
18.	Sardar Irshad Ali (MC BS-17)	SDEO (Male) Bankad, Kohistan Lower (AVP)
FEMALE		
19.	Mst. Tasleem Kausar (MC BS-17)	SDEO (Female) Havellian, Abbottabad (AVP)
20.	Mst. Shaila Kalsoom (MC BS-17)	SDEO (Female) Sub Division Jandola Tank (AVP)
21.	Mst. Roheela Naz (MC BS-17)	SDEO (Female), Dargai Malakand (AVP)
22.	Mst. Razia Khatoon (MC BS-17)	SDEO (Female) Charbagh, Swat (AVP)
23.	Mst. Aisha Gohar (MC BS-17)	Assistant Director, Directorate of E&SE (AVP)
24.	Mst. Tahir un Nisa (MC BS-17)	SDEO (Female) Hangu (AVP)
25.	Mst. Noreen Saba (MC BS-17)	SDEO (Female) Harban Basha Kohistan Upper (AVP)
26.	Mst. Naseera Begum (MC BS-17)	Assistant Director, Directorate of E&SE (AVP)
27.	Mst. Abida Nasreen (MC BS-17)	SDEO (Female) Razmak, North Waziristan (AVP)
28.	Mst. Irum Noreen (MC BS-17)	SDEO (Female) Domail Bannu (AVP)
29.	Mst. Bibi Zahida (MC BS-17)	SDEO (Female) Bara, District Khyber (AVP)
30.	Mst. Naseem Begum (MC BS-17)	SDEO (Female) Balambat, Dir Lower (AVP)
31.	Mst. Azra Afridi (MC BS-17)	SDEO (Female) Daggar, Buner (AVP)
32.	Mst. Shaista Khan (MC BS-17)	SDEO (Female) Pattan Kohistan Lower (AVP)
33.	Mst. Sabreena Fayaz (MC BS-17)	SDEO (Female) Tangi, Charsadda (AVP)
34.	Mst. Shagufta Abbasi (MC BS-17)	SDEO (Female) Ghazi Haripur (AVP)
35.	Mst. Sadiqa Bibi (MC BS-17)	SDEO (Female) Mirali, North Waziristan (AVP)
36.	Mst. Muneera Bibi (MC BS-17)	SDEO (Female) Torkhow Mulkhaw Chitral Upper (AVP)
37.	Mst. Maryam Aman (MC BS-17) <i>under transfer as SDEO (Female) Tangi Charsadda</i>	Retained as Assistant Director, Directorate of E&SE.

30.5.22



SECRETARY TO THE GOVT: OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

5

Ann - II



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. (091) 9221188

Dated Peshawar the June 10th, 2022

CORRIGENDUM

NO.80(MC)E&SE/D/4-10/2022/PT/POSTING/TRANSFER/MC: In partial modification of this Department's Notification of even number dated 30-05-2022, the following posting / transfers are hereby ordered, in the best public interest: -

Sr. No	Name and designation	Under transfer as	New place of posting
1	Mr. Wali ur Rehman (MC BS-17)	SDEO (Male) Alai Battagram	SDEO (Male) Barawal Bandi, Dir Upper (AVP)
2	Mr. Saib Zamin Shah (MC BS-17)	SDEO (Male) Nawagal, District Bajaur	SDEO (Male) Khwazakhela, District Swat (AVP)
3	Mst. Noreen Saba (MC BS-17)	SDEO (Female) Harban Basha, Kohistan Upper	SDEO (Female) Tank (AVP)

SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Endst: of even No. & date:

Copy forwarded for information to the: -

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

Naseer
10.6.22

(NASEER ABBAS KHALIL)
SECTION OFFICER (Management Cadre)

(6)

Ann- II/1

CERTIFICATE OF TRANSFER OF CHARGE


- (1) Certified that we have on the 11/06/2022 (Forenoon) of this day respectively made over and received Charge of the post of SDEO-F at Office of the SDEO-F Tank vide worthy Secretary to Govt: of Khyber Pakhtunkhwa E&SED Notification No. SO (MC) E&SED / 4-16/ 2022/ dated 10/06/2022.
- (2) Particular cash and important secret and confidential documents handed over are noted on the reverse

Signature of relieved
Government Servant:
Designation:

VACANT

Station: - DEO-F Tank

Signature of relieving
Government Servant:
Designation:


MS. NOREEN SABA
SDEO-F



Telephone & Fax: 0963-510380
Email: deftank@gmail.com
Facebook: [deftank](https://www.facebook.com/deftank)
Twitter: [deftank](https://twitter.com/deftank)

**OFFICE OF THE
DISTRICT EDUCATION OFFICER (F) TANK**

Endsl: No. 5001-50021 dated Tank the 11/06 /2022

Copy Forwarded to the:

1. PS to Secretary Govt: of Khyber Pakhtunkhwa E&SED Peshawar.
2. PA to Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. Section Officer (MC) Govt: of Khyber Pakhtunkhwa E&SED Peshawar.
4. District Accounts Officer Tank.
5. Manager commercial bank (s) concerned.
6. Officer concerned.
7. Office File.


District Education Officer (F)
District Tank



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9221388

7

Dated Peshawar the June 27th, 2022

Ann - III

[REDACTED]

NO. SO(MC)E&SED/4-16/POSTING/TRANSFER/MC: In compliance with the Order Sheet of Khyber Pakhtunkhwa Service Tribunal (Camp Court DI Khan) dated 31-01-2022 in Service Appeal No. 137/2022, titled "Shamshad Bibi, SDEO (Female) VS Govt. of Khyber Pakhtunkhwa & Others", this Department's Notification of even number dated 09-06-2022 regarding posting/transfer of Mst Sonia Nawaz (MC BS-17) from the post of SDEO (Female) Tank, is hereby withdrawn *ab-initio*

2- Consequent upon the above, Mst. Noreen Saba (MC BS-17) SDEO (Female) Tank is hereby transferred and posted as SDEO (Female) Hangu against the vacant post, in the best public interest.

SECRETARY TO THE GOVT: OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Endst: of even No. & date:

Copy forwarded for information to the: -

- 1 Registrar Khyber Pakhtunkhwa Service Tribunal, Peshawar
- 2 Accountant General, Khyber Pakhtunkhwa, Peshawar
- 3 Director, E&SE Khyber Pakhtunkhwa, Peshawar.
- 4 District Education Officers (Female) DI Khan, Tank and Hangu.
- 5 Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
- 6 District Accounts Officers DI Khan, Tank and Hangu.
- 7 Section Officer (Litigation-II) E&SE Department with the direction to pursue the case in KP Service Tribunal Peshawar till final decision
- 8 PS to Secretary, E&SE Department, Khyber Pakhtunkhwa
- 9 Officers concerned.
- 10 Master file.

Naseer
27.6.22

(NASEER ABBAS KHALIL)
SECTION OFFICER (Management Cadre)



Telephone & Fax: 0963-510380

Email: deoftank@gmail.com

Facebook: deoftank

Twitter: deofemaletank

(8)

**OFFICE OF THE
DISTRICT EDUCATION OFFICER (F) TANK**

No. 407/1AP/

Dated Tank the 09/06/2022

To

The worthy Secretary to Govt: of Khyber Pakhtunkhwa
E&SED Peshawar.

Ann - IV

SUBJECT: UNETHICAL ATTITUDE OF SDEO-F TANK.

Memo:

Your worthy-self considerations are required on the following points.

1. That since the day, when one Ms. Sonia Nawaz walked in to this District as SDEO-F, this office become nightmare for District authorities as well as for lower formation staff.
2. That she did only one job quite effectively during her stay that is conspiracies and dramas.
3. That she never left bottle neck to defame this office's esteem.
4. That she had never keep regard of the undersigned which deserved officially to be done.
5. That she always used abusive language with the undersigned and evidences of the same can be provided for your consideration at any time.
6. That her presence always lead this office in dreadful state and primary schools under her jurisdiction are devastating for her negligence & "Back on wrong Horse" decisions.

Your worthy-self is therefore, requested that the aforementioned soul may be disposed-off from this District as a chain is no stronger than its weakest link please.

(AZRA BIBI)

District Education Officer (F)

District Tank

Phone.# 0963-510380

9



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

Dated Peshawar the June 09th, 2022

NOTIFICATION

NO. SO(MC)E&SED/4-16/2021/POSTING/TRANSFER/MC: Mst. Sonia Nawaz (MC BS-17) SDEO (Female) Tank is hereby transferred and directed to immediately report to Directorate of Elementary & Secondary Education, Khyber Pakhtunkhwa.

**SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT**

Endst: of even No.& date:

Copy forwarded for information to the: -

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

Naseer
9.6.22.
(NASEER ABBAS KHALIL)
SECTION OFFICER (Management Cadre)



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

Dated Peshawar the June 27th, 2022

NOTIFICATION

NO. SO(MC)E&SED/4-16/POSTING/TRANSFER/MC: In compliance with the Order Sheet of Khyber Pakhtunkhwa Service Tribunal (Camp Court DI Khan) dated 31-01-2022 in Service Appeal No. 137/2022, titled "Shamshad Bibi, SDEO (Female) VS Govt. of Khyber Pakhtunkhwa & Others", this Department's Notification of even number dated 09-06-2022 regarding posting/transfer of Mst. Sonia Nawaz (MC BS-17) from the post of SDEO (Female) Tank, is hereby withdrawn *ab-initio*.

- 2- Consequent upon the above, Mst. Noreen Saba (MC BS-17) SDEO (Female) Tank is hereby transferred and posted as SDEO (Female) Hangu against the vacant post, in the best public interest.

SECRETARY TO THE GOVT: OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Endst: of even No. & date:

Copy forwarded for information to the: -

1. Registrar Khyber Pakhtunkhwa Service Tribunal, Peshawar.
2. Accountant General, Khyber Pakhtunkhwa, Peshawar.
3. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
4. District Education Officers (Female) DI Khan, Tank and Hangu.
5. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
6. District Accounts Officers DI Khan, Tank and Hangu.
7. Section Officer (Litigation-II) E&SE Department with the direction to pursue the case in KP Service Tribunal Peshawar till final decision.
8. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
9. Officers concerned.
10. Master file.

EC M.
25/6/2022

Naseer
27.6.22

(NASEER ABBAS KHALIL)
SECTION OFFICER (Management Cadre)

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

Service Appeal No. 137/2022

Mst. Shamshad Bibi

VS

Govt of KP etc

**APPLICATION FOR VACATION OF
SUSPENSION ORDER.**

RESPECTFULLY SHEWETH:

1. That the respondent no.8 has filed an reply along-with application.
2. That the respondent no.8 has good prime facie case and all the ingredients is in favour of respondent.
3. That the grounds of reply may also be considered as integral part of this application.
4. That the transfer of the respondent no.8 was made according to law. And suspension order was issued without any notice.
5. That the charge of the post was already relieve by the appellatant.

It is, therefore, most humbly prayed that the suspension order may be vacated. Any other remedy, which this august tribunal deems fit that may also be awarded in favour of respondent.

Respondent No.8

Through:

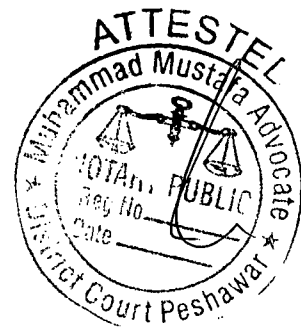

(M. ASIF YOUSAFZAI
ADVOCATE SUPREME COURT


(SYED NOMAN ALI BUKHARI)
ADVOCATE, PESHAWAR.

AFFIDAVIT:

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


DEPONENT



BEFORE THE KHYBER PAKHTUNKHWA,
SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. 137/2022

Mst. Shamshad Bibi

VS

Govt of KP etc

=====

**APPLICATION FOR REJECTION OF APPEAL ON BEHALF OF
RESPONDENT NO.8.**

RESPECTFULLY SHWETH:

1. That the appellant has no locus-standai to file the above mentioned appeal.
2. That the appeal is not maintainable and entertain-able.
3. That the court has no jurisdiction to entertained the above mentioned appeal.
4. That the appellant has no cause of action to file the instant appeal,
5. That the appeal filed by the appellants is premature and in violation of Sec-4 of the service Tribunal Act 1974.
6. That the appeal in hand is liable to be dismissed with cost.
7. That according to Section-10 of the Civil Servant Act 1973 the appellant is bound to do his duty anywhere in the Province.
8. That the appellant not filed appeal under section 4 of the Service Tribunal Act 1974 as the statutory period of 90 days was not lapsed, hence premature which should be rejected.
9. That the Appellant was transferred under section-10 of the Civil Servant Act, 1973, wherein every civil servant is bound to serve anywhere. So, the Act shall prevail over the policy. Therefore, the impugned order of the appellant was according to law. Further the appeal of the appellant is premature under section-4 , so the same may be rejected.

In view of above it is humbly submitted that the appeal of the appellant may be rejected.

Respondent No.8

Through:

M. Asif
M. ASIF YOUSAFZAI
ADVOCATE SUPREME COURT

Noman
(SYED NOMAN ALI BUKHARI)
ADVOCATE, PESHAWAR.

AFFIDAVIT:

I, respondent no.8 state on oath that the contents of the above application is true and correct to the best of knowledge and belief, and nothing has been withheld or concealed from the Honorable Court.

H
Deponent



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

Service Appeal No. 137/2022

Mst. Shamshad Bibi

VS

Govt of KP etc

**APPLICATION FOR REJECTION OF APPEAL ON BEHALF OF
RESPONDENT NO.8.**


RESPECTFULLY SHWETH:

1. That the appellant has no locus-standai to file the above mentioned appeal.
2. That the appeal is not maintainable and entertain-able.
3. That the court has no jurisdiction to entertained the above mentioned appeal.
4. That the appellant has no cause of action to file the instant appeal.
5. That the appeal filed by the appellants is premature and in violation of Sec-4 of the service Tribunal Act 1974.
6. That the appeal in hand is liable to be dismissed with cost.
7. That according to Section-10 of the Civil Servant Act 1973 the appellant is bound to do his duty anywhere in the Province.
8. That the appellant not filed appeal under section 4 of the Service Tribunal Act 1974 as the statutory period of 90 days was not lapsed, hence premature which should be rejected.
9. That the Appellant was transferred under section-10 of the Civil Servant Act, 1973, wherein every civil servant is bound to serve anywhere. So, the Act shall prevail over the policy. Therefore, the impugned order of the appellant was according to law. Further the appeal of the appellant is premature under section-4 , so the same may be rejected.

In view of above it is humbly submitted that the appeal of the appellant may be rejected.

Respondent No.8

Through:


M. ASIF YOUSAFZAI
ADVOCATE SUPREME COURT


(SYED NOMAN ALI BUKHARI)
ADVOCATE, PESHAWAR.

AFFIDAVIT:

I, respondent no.8 state on oath that the contents of the above application is true and correct to the best of knowledge and belief, and nothing has been withheld or concealed from the Honorable Court.


Deponent

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

Service Appeal No. 137/2022

Mst. Shamshad Bibi

VS

Govt of KP etc

**APPLICATION FOR REJECTION OF APPEAL ON BEHALF OF
RESPONDENT NO.8.**


RESPECTFULLY SHWETH:


1. That the appellant has no locus-standai to file the above mentioned appeal.
2. That the appeal is not maintainable and entertain-able.
3. That the court has no jurisdiction to entertained the above mentioned appeal.
4. That the appellant has no cause of action to file the instant appeal.
5. That the appeal filed by the appellants is premature and in violation of Sec-4 of the service Tribunal Act 1974.
6. That the appeal in hand is liable to be dismissed with cost.
7. That according to Section-10 of the Civil Servant Act 1973 the appellant is bound to do his duty anywhere in the Province.
8. That the appellant not filed appeal under section 4 of the Service Tribunal Act 1974 as the statutory period of 90 days was not lapsed, hence premature which should be rejected.
9. That the Appellant was transferred under section-10 of the Civil Servant Act, 1973, wherein every civil servant is bound to serve anywhere. So, the Act shall prevail over the policy. Therefore, the impugned order of the appellant was according to law. Further the appeal of the appellant is premature under section-4 , so the same may be rejected.

In view of above it is humbly submitted that the appeal of the appellant may be rejected.

Respondent No.8

Through:


M. ASIF YOUSAFZAI
ADVOCATE SUPREME COURT


(SYED NOMAN ALI BUKHARI)
ADVOCATE, PESHAWAR.

AFFIDAVIT:

I, respondent no.8 state on oath that the contents of the above application is true and correct to the best of knowledge and belief, and nothing has been withheld or concealed from the Honorable Court.


Deponent



OFFICE OF THE DISTRICT EDUCATION OFFICER
(MALE) DERA ISMAIL KHAN
Tell: 09669280128- 09669280131

No. 8278-19

Dated DIKhan the 23/4/22

To

The Worthy Secretary,
Elementary & Secondary Education Department KP Peshawar.

Subject: **POSTING OF PRINCIPAL (BS-18)**

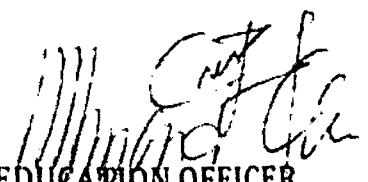
Reference to your good office Notification dated 03.01.2022 the Dy: DEO(M) DIKhan Mr. Mehmood Iqbal was transferred to the post of Dy: DFO(M) Orakzai and Mr. Assim Saeed was posted as Dy: DEO(M) DIKhan against the vacant post vide E&SE Department Notification Dated 10.01.2022.

Mr. Mehmood Iqbal approached to the Honourable Service Tribunal KP and the Honourable Service Tribunal was pleased to grant status quo vide order dated 31.01.2022 and further the Honourable Peshawar High Court DIKhan Bench was pleased to extend the stay quo order. (copy attached)

In the meanwhile Mr. Muhammad Ejaz Khan (BS-18) was transferred from the post of Principal GHS Tejori Tank to the post of Principal GHS Himat DIKhan vide order dated 11.02.2022 and on 11.02.2022 the same post was occupied by Mr. Asim Saeed.

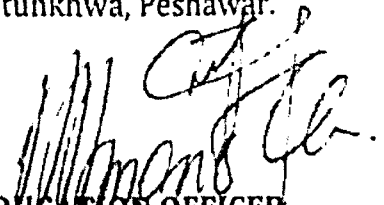
That on 14.03.2022 Mr. Muhammad Ejaz Khan had joined the post of principal GHS Himat. The matter was discussed telephonically with worthy Additional Secretary (General) and direction was issued to Mr. Muhammad Ejaz Khan to join the previous post as the matter of post GHS Himat is pending before the court of law. (copy attached)

It is, therefore, requested to your kind honour that kindly withdraw the transfer Notification dated 11.02.2022 to the extent of Mr. Muhammad Ejaz Khan as the matter is sub,udice before the court of law.


DISTRICT EDUCATION OFFICER
(MALE) DIKHAN

Copy for information to the:-

1. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.


DISTRICT EDUCATION OFFICER
(MALE) DIKHAN

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

Service Appeal No. 137/2022

Mst. Shamshad Bibi

VS

Govt of KP etc

.....

**APPLICATION FOR TRANSFERRING THE INSTANT APPEAL FROM
D.I KHAN CAMP COURT TO PRINCIPAL SEAT PESHAWAR OF THE
HONOURABLE TRIBUNAL.**

.....

RESPECTFULLY SHEWETH:



1. That the appellant has filed the instant appeal against transfer order.
2. That the appeal is in reply stage and is fixed for 24/2/2022 at D.I Khan Camp Court of this Honourable KPK Service Tribunal.
3. That the offices of main respondents are located at Peshawar. Therefore it will be convenient for Tribunal to call up any record about the appellant from the respondents.
4. That the private respondent also engaged the counsel of Peshawar.
5. That it will be in the interest of justice to transfer the instant appeal from D.I Khan Camp Court of this Honourable Tribunal to principal seat Peshawar.

It is, therefore, most humbly prayed that on acceptance of this application, the instant appeal may be transfer from D.I Khan Camp Court to principal seat Peshawar of this Honourable Tribunal for early disposal. Any other remedy which this august

Tribunal deems fit and appropriate that may also be awarded in favour of the respondent.

Respondent No.8

Through:


(M. ASIF YOUSAFZAI
ADVOCATE SUPREME COURT

(SYED NOMAN ALI BUKHARI)
ADVOCATE, PESHAWAR

AFFIDAVIT:

It is affirmed and declared that the contents of the above Application are true and correct to the best of my knowledge and belief and nothing has been concealed from Hon'able Tribunal,


Deponent



10

1

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR CAMP COURT D.I.KHAN

CM Petition No. _____/2022

In Service Appeal No. 137 of 2022

Shamshad Bibi

Vs.

Govt. of Khyber Pakhtunkhwaw & others

Service Appeal

APPLICATION FOR SUSPENSION OF THE NOTIFICATION#SO(MC)E&SED/4-16/2022/POSTING/TRANSFER/MC DATED 27/06/2022 ISSUED BY THE SECRETARY EDUCATION DEPARTMENT KPK PESHAWAR TILL FINAL DECISION OF THE ABOVE TITLED SERVICE APPEAL.

Respectfully Sheweth;

Petitioner humbly submits as under;

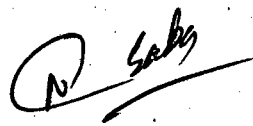
1. That the above titled service appeal is pending adjudication before this honourable Tribunal and is fixed for 01/07/2022.
2. That the petitioner has got prima facie case and balance of convenience also tilts in favour of petitioner and there is every possibility of acceptance of the instant service appeal in favour of petitioner.
3. That the respondents illegal transferred the petitioner vide impugned notification No. SO(MC)E&SED/4-16/2022/Posting/Transfer/ MC dated 27/06/2022 which is not sustainable in the eye of law and if the operation of same notification is not suspended as the counsel for the private respondent#8 (Sonia Nawaz) have misguided the court by concealing the facts as transfer/OSD of Sonia Nawaz (Respondent#8) was on fresh grounds/circumstances.
4. That if the operation of impugned notification is not suspended then the petitioner will suffer irreparable loss.

11

- 5. That in such like situation this honourable Tribunal has got the vast powers to entertain the application in hand.
- 6. That counsel for the petitioner may please be allowed to raise additional grounds at the time of arguments.

It is, therefore, humbly prayed that on acceptance of the instant application the operation of impugned notification may kindly be suspended in the interest of justice.

June 30, 2022



Humble Applicant

Noreen Saba

Through Counsel



Sheikh Iftikhar ul Haq
Advocate High Court

AFFIDAVIT:

I, **Noreen Saba**, the petitioner do hereby solemnly affirm and declare on Oath that contents of the accompanying CM petition are true and correct to the best of my knowledge and belief; and nothing has been deliberately concealed from this Hon'ble Court.

June 30, 2022



Deponent

Identified by:
12201-1632085-0



A. J. Jinnah
30/06/22



Sheikh Iftikhar ul Haq
Advocate High Court



SUPREME COURT BAR ASSOCIATION
OF PAKISTAN

Khar-UI-H
Advocate Supreme Court
12201-0316740-9



President

Secretary

وکالت نامہ

کورٹ
فیس

Before the J. P. K. Sex. Trib. Camp court P. T. K
Applicant Noreen Saba
Shamshah Bibi vs Govt of K. P. K at
Unpleaded petition Service Appeal
No 137 / 2022
دعوی یا جرم
تفصیل دعوی یا جرم

باعث تحریر آنگہ
D. I. Khan
مقدمہ مندرجہ بالا عنوان میں اپنی طرف واسطے بیرونی وجوہ دی برائے پیش یا تصدق مقدمہ تمام
شکیلہ Adv. S.

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں پیشی پر خود یا ہذا بیڈریو برو عدالت حاضر ہوتا رہوں گا اور ہر وقت پکارے جانے مقدمہ وکیل صاحب
موصوف کو اطلاع دے کر حاضر عدالت کروں گا اگر پیشی پر منظر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے خلاف ہو گیا تو صاحب
موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل
بیرونی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ صدر پکھری کے علاوہ اور جگہ سماعت ہونے یا بروز تعطیل یا پکھری کے اوقات کے آگے یا پیچھے پیش ہونے
پر منظر کوئی نقصان پہنچے تو اس کے ذمہ دار یا اسکے واسطے کسی معاوضہ کے ادا کرنے یا محنت نہ واجب کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھ
کو کل ساختہ پر داخست صاحب موصوف مثل کردہ ذات خود منظور قبول ہو گا اور صاحب موصوف کو عرض دعوی یا جواب دعوی یا درخواست اجراء اسمائے ذگری
نظر ثانی اپیل گمرانی و ہر قسم درخواست ہر قسم کے بیان دینے اور پر تائلی یا راضی نامہ و فیصلہ برحلاف کرنے اقبال دعوی کا بھی اختیار ہو گا اور بصورت مقرر ہونے
تاریخ پیشی مقدمہ مقرر بیرون از پکھری صدر بیرونی مقدمہ مقرر نظر ثانی اپیل و گمرانی و برآمدگی مقدمہ یا منسوفی ذگری یک طرفہ یا درخواست حکم اتناہی یا قرتی
یا گرفتاری قبل از فیصلہ اجراء ذگری بھی صاحب موصوف کو بشرط ادائیگی علیحدہ مختا بیرونی کا اختیار ہو گا اور تمام ساختہ پرواخذت صاحب موصوف مثل کردہ
انہ خود منظور و قبول ہو گا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہو کہ مقدمہ مقررہ یا اس کے کسی جزوی کاروائی یا بصورت درخواست نظر ثانی
اپیل گمرانی یا دیگر معاملہ و قدمہ مذکورہ کسی دوسرے وکیل یا بیر سز کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے شیر قانون کو بھی ہر امر میں وہی اور دیے
اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر جانہ التواء پڑے گا وہ صاحب موصوف کا حق ہو گا مگر
صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہو گا کہ مقدمہ کی پروی نہ کریں اور ایسی صورت
میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا

لہذا وکالت نامہ لکھ دیا ہے تاکہ سند رہے
2022
30
ماہ جنوری
مورخہ
مضمون وکالت نامہ سن لیا ہے اور اچھی طرح کچھ لیا ہے اور منظور ہے

Accepted
A. S. C
12201-183
A. S. C

[BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRBUNAL PESHAWAR.]

Civil Misc No. /2022 in
Service Appeal No. 137/2022

Mst Shamshad Bibi

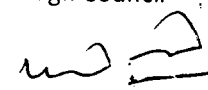
vs

Govt of KP etc

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Yours Humble Appellant
Through Council


Mr Khalid Mahmood
Advocate DIKhan

[BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.]

Civil Misc No. /2022 in
Service Appeal No. 137/2022

(1)

Mst. Shamshad Bibi

vs

Govt of KP etc

REJOINDER TO THE COMMENTS OF RESPONDENTS NO. 01, 03, 04 05 AND 06

Respectfully Sheweth;

Appellant humbly submits the following reply to the comments of respondents.

1. Preliminary objections

1-14 Incorrect misconceived and thus denied. The denial of rights malafied, discrimination and malfeasance on the part of respondents provided a valid cause of action and locus standi and depriving from due rights has provided a cause of action to appellant to file present service appeal. Appellant has been receiving the salary from the post of SDEO (F) Paharpure. (Annexure A). Moreover all objection vehemently denied.

Para-wise Reply on Facts:

Para No.1. Incorrect / Not Admitted. The appellant was posted as SDEO (F), tank D.I.Khan, vide order dated 09 August 2019 (Annexure B). After completing more than **02 Years** tenure as SDEO (F) tank, transferred as SDEO (F) to Paharpure, by competent authority vide Notification Dated: 07-10-2021, (Annexure C) and respondents No. 8, Mst Sonia Nawaz SDEO (F), completing the more than **02 Years** tenure as SDEO (F) Paharpure vide order dated 09 August 2019 (Annexure D), transferred to as SDEO (F) Tank, vide order dated 07.10.2021 (Annexure E).

Para No.2. Incorrect /Not Admitted. Strongly denied. That the respondents No.3, just within 3 months of the transfer of the appellant to D.I.khan, issued impugned notification dated 12.01.2022 vide which the appellant was transferred back to District Tank, whereas respondents No.08, (Sonia Nawaz), on the basis of favoritism was transferred back to D.I.Khan after three months (Annexure F).

a. Incorrect /Not Admitted. Strongly denied. The transfer of appellant after 03 months, not completing the tenure as SDEO (F) Paharpure is against the government policy and section 17, Sl.No.7(1) of ESTA Court. (Annexure G and H).

Para No.3. Incorrect / Not Admitted. Strongly denied. That the alleged appeal, which was filed by respondents No.08 was manured and faked, because the alleged appeal bearing no date and diary dispatch No. etc. furthermore the impugned order dated 12.01.2022, is fresh one transfer order and not on the basis of alleged appeal. (copy of alleged appeal is annexed as I). Furthermore Sonia Nawaz was transferred and directed to immediately report to Directorate of Elementary, and Secondary Education Khyber pakhtunkhwa, vide notification dated 09.06.2022 (Annexure J) on complaint of DEO (F) Tank, letter dated. 09.06.2022. (Annexure K) and another SDEO (F) namely Mst Noreen Saba was posted as SDEO (F) Tank vide notification dated 10.06.2022 (Annexure L). It is pertinent to mention that when counsel for appellant submitted CM for deletion of name of respondents No.08 (Sonia Nawaz), because she was transferred to Peshawar. The respondents No. 03, has withdraw the order dated

09.06.2022, vide notification dated 27.06.2022, wrongly referred to court, which shows clearly malafide on the part of respondents (Annexure M). (2)

OBJECTION ON GROUND:

Para.No.b. Incorrect /Not Admitted. Strongly denied. The mala-fide, discrimination and favoritism on the part of respondent is apparent from the facts as disclosed in the above Paras which needs not to be repeated.

Para. No.c. Incorrect /Not Admitted. Strongly denied. Reply as in the above Paras.

Para.No.d. Incorrect/Not Admitted. Strongly denied. The mala-fide, discrimination and favoritism on the part of respondent is apparent from the facts as disclosed in the Paras.

Para No. e. Incorrect /Not Admitted. Strongly denied. The mala-fide, discrimination and favoritism on the part of respondent is apparent from the facts as disclosed in the Paras.

ParaNo.f. Incorrect /Not Admitted. Strongly denied.

Para No.g. Incorrect /Not Admitted. Strongly denied. The mala-fide, discrimination and favoritism on the part of respondent is apparent from the facts as disclosed in the above Paras.

Para No.h. Incorrect /Not Admitted. Strongly denied. The mala-fide, discrimination and favoritism on the part of respondent is apparent from the facts as disclosed in the Paras.

Para No.i. Incorrect /Not Admitted. Strongly denied. The mala-fide, discrimination and favoritism on the part of respondent is apparent from the facts as disclosed in the Paras.

Para No.j. Incorrect /Not Admitted. Strongly denied. The mala-fide, discrimination and favoritism on the part of respondent is apparent from the facts as disclosed in the above Paras. The case of appellant come in the domain of premature transfer/violation of judgment of superior courts and government policy, hence the transfer of appellant was not according to law rules and policies of government.

Para No.K. That there is no ground available to respondents to argue.

It is therefore humbly prayed that in light of above submissions, the service appeal may kindly be allowed as prayed for.

Dated: 30/6/2022

Your Humble Appellant
Through Council

Ahmad Ali Khan
Advocate Supreme Court

Mr Khalid Mahmood
Advocate D.I.Khan

[BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.]

Civil Misc No. _____/2022 in
Service Appeal No. 137/2022

3

Mst Shamshad Bibi

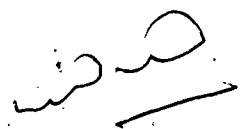
vs

Govt of KP etc


AFFIDAVIT

I Khalid Mahmood, Counsel for the Appellant do hereby solemnly affirm and declare on oath that all the para-wise contents of above rejoinder are true and correct to the best of my knowledge, information and belief and that nothing has been deliberately concealed from this honorable tribunal.

Dated: 30/6/2022


Deponent

Dist. Govt. KP-Provincial
District Accounts Office D.I.Khan
Monthly Salary Statement (December-2021)

ANRf (A)  (4)

Personal Information of Mrs SHAMSHAD BIBI d/w/s of

Personnel Number: 00188304 CNIC: 1210143892628 NTN:
 Date of Birth: 01.01.1978 Entry into Govt. Service: 22.11.2002 Length of Service: 19 Years 01 Months 01 Days

Employment Category: Active Permanent

Designation: DEPUTY DISTRICT OFFICER 80001692-DISTRICT GOVERNMENT KHYBE

DDO Code: DI6216-DDO (F) ADMN PAHARPUR DISTT DIKHAN

Payroll Section: 001 GPF Section: 001 Cash Center:

GPF A/C No: Interest Applied: Yes **GPF Balance: 5,882,277.00**

Vendor Number: 30395367 - SHAMSHAD BIBI SDEO(F) Munda

Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 17 Pay Stage: 5

Wage type		Amount	Wage type		Amount
0001	Basic Pay	41,870.00	1001	House Rent Allowance 45%	6,650.00
1947	Medical Allow 15% (16-22)	1,847.00	2148	15% Adhoc Relief All-2013	-660.00
2199	Adhoc Relief Allow @10%	452.00	2211	Adhoc Relief All 2016 10%	2,356.00
2224	Adhoc Relief All 2017 10%	4,187.00	2247	Adhoc Relief All 2018 10%	4,187.00
2265	Adhoc Relief All 2019 05%	2,093.00	2309	Adhoc Relief All 2021 10%	4,187.00
2315	Special Allowance 2021	6,074.00			0.00

Deductions - General

Wage type		Amount	Wage type		Amount
3017	GPF Subscription	-4,270.00	3501	Benevolent Fund	-1,500.00
3609	Income Tax	-1,566.00	3990	Emp.Edu. Fund KPK	-250.00
4004	R. Benefits & Death Comp:	-900.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	160,000.00	+2,500.00	0.00

Deductions - Income Tax

Payable: 16,566.05 Recovered till DEC-2021: 7,170.00 Exempted; 0.05 Recoverable: 9,396.00

Gross Pay (Rs.): 74,563.00 Deductions: (Rs.): -10,986.00 Net Pay: (Rs.): 63,577.00

Payee Name: SHAMSHAD BIBI

Account Number: PLS 1300-2

Bank Details: NATIONAL BANK OF PAKISTAN, 231450 N.B.P.TIGARAT GANJ D.I.KHAN N.B.P.TIGARAT GANJ, D.I.KHAN,

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address: DIKHAN

City: D.I.KHAN

Temp. Address:

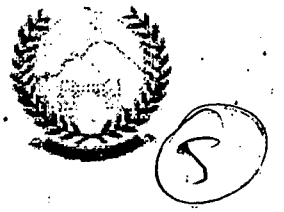
City:

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Email: asifinaths43@gmail.com

Dist. Govt. KP-Provincial
District Accounts Office D.I.Khan
Monthly Salary Statement (January-2022)



Personal Information of Mrs SHAMSHAD BIBI d/w/s of
 Personnel Number: 00188304 CNIC: 1210143892628
 Date of Birth: 01.01.1978 Entry into Govt. Service: 22.11 2002

NTN:
 Length of Service: 19 Years 02 Months 011 Days

Employment Category: Active Permanent

Designation: DEPUTY DISTRICT OFFICER 80001692-DISTRICT GOVERNMENT KHYBE

DDO Code: DI6216-DDO (F) ADMN PAHARPUR DISTT DIKHAN

Payroll Section: 001 GPF Section: 001 Cash Center:

GPF A/C No: Interest Applied: Yes **GPF Balance: 5,882,277.00**

Vendor Number: 30395367 - SHAMSHAD BIBI SDEO(F) Munda
 Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 17 Pay Stage: 5

Wage type		Amount	Wage type		Amount
0001	Basic Pay	16,208.00	1001	House Rent Allowance 45%	2,574.00
1947	Medical Allow 15% (16-22)	715.00	2148	15% Adhoc Relief All-2013	255.00
2199	Adhoc Relief Allow @10%	175.00	2211	Adhoc Relief All 2016 10%	912.00
2224	Adhoc Relief All 2017 10%	1,621.00	2247	Adhoc Relief All 2018 10%	1,621.00
2265	Adhoc Relief All 2019 05%	810.00	2309	Adhoc Relief All 2021 10%	1,621.00
2315	Special Allowance 2021	2,351.00			0.00

Deductions - General

Wage type		Amount	Wage type		Amount
3609	Income Tax	-811.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 12,035.60 Recovered till JAN-2022: 7,981.00 Exempted: 0.10- Recoverable: 4,054.70

Gross Pay (Rs.): 28,863.00 Deductions: (Rs.): -811.00 Net Pay: (Rs.): 28,052.00

Payee Name: SHAMSHAD BIBI

Account Number: PLS 1300-2

Bank Details: NATIONAL BANK OF PAKISTAN, 231450 N.B.P. TIGARAT GANJ D.I.KHAN N.B.P. TIGARAT GANJ D.I.KHAN,

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address: DIKHAN

City: D.I.KHAN

Temp. Address:

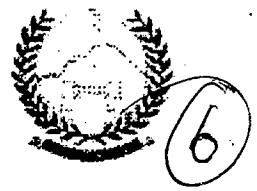
City:

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Email: asifmaths43@gmail.com

Dist. Govt. KP-Provincial
District Accounts Office D.I.Khan
Monthly Salary Statement (February-2022)



Personal Information of Mrs SHAMSHAD BIBI d/w/s of

Personnel Number: 00188304 CNIC: 1210143892628 NTN:
 Date of Birth: 01.01.1978 Entry into Govt. Service: 22.11.2002 Length of Service: 19 Years 03 Months 008 Days

Employment Category: Active Permanent

Designation: DEPUTY DISTRICT OFFICER 80001692-DISTRICT GOVERNMENT KHYBE
 DDO Code: DI6216-DDO (F) ADMN PAHARPUR DISTT DIKHAN
 Payroll Section: 001 GPF Section: 001 Cash Center:
 GPF A/C No: GPF Interest applied **GPF Balance:** 5,886,547.00 (provisional)
 Vendor Number: 30395367 - SHAMSHAD BIBI SDEO(F) Munda
Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 17 Pay Stage: 5

Wage type		Amount	Wage type		Amount
0001	Basic Pay	41,870.00	1001	House Rent Allowance 45%	6,650.00
1947	Medical Allow 15% (16-22)	1,847.00	2148	15% Adhoc Relief All-2013	660.00
2199	Adhoc Relief Allow @10%	452.00	2211	Adhoc Relief All 2016 10%	2,356.00
2224	Adhoc Relief All 2017 10%	4,187.00	2247	Adhoc Relief All 2018 10%	4,187.00
2265	Adhoc Relief All 2019 05%	2,093.00	2309	Adhoc Relief All 2021 10%	4,187.00
2315	Special Allowance 2021	6,074.00	5801	Adj Basic Pay	45,700.00

Deductions - General

Wage type		Amount	Wage type		Amount
3017	GPF Subscription	-4,270.00	3501	Benevolent Fund	-1,500.00
3609	Income Tax	-1,717.00	3990	Emp. Edu. Fund KPK	-250.00
4004	R. Benefits & Death Comp:	-900.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 16,566.00 Recovered till FEB-2022: 9,698.00 Exempted: 0.00 Recoverable: 6,868.00

Gross Pay (Rs.): 120,263.00 Deductions: (Rs.): -8,637.00 Net Pay: (Rs.): 111,626.00

Payee Name: SHAMSHAD BIBI
 Account Number: PLS 1300-2
 Bank Details: NATIONAL BANK OF PAKISTAN, 231450 N.B.P. TIGARAT GANJ D.I.KHAN N.B.P. TIGARAT GANJ D.I.KHAN,

Leaves: Opening Balance: Availed: Earned: Balance:

Permanent Address: DIKHAN
 City: D.I.KHAN Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official
 Temp. Address:
 City: Email: asifmaths43@gmail.com

System generated document in accordance with APPM 4.6.12.9(50305586/21.02.2022/v3.0)
** All amounts are in Pak Rupees*
** Errors & omissions excepted (SERVICES/28.02.2022/18:08:53)*

Dist. Govt. KP-Provincial
District Accounts Office D.I.Khan
Monthly Salary Statement (March-2022)



Personal Information of Mrs SHAMSHAD BIBI d/w/s of

Personnel Number: 00188304 CNIC: 1210143892628
 Date of Birth: 01.01.1978 Entry into Govt. Service: 22.11.2002

NTN:
 Length of Service: 19 Years 04 Months 011 Days

Employment Category: Active Permanent

Designation: DEPUTY DISTRICT OFFICER 80001692-DISTRICT GOVERNMENT KHYBE
 DDO Code: DI6216-DDO (F) ADMN PAHARPUR DISTT DIKHAN
 Payroll Section: 001 GPF Section: 001 Cash Center:
 GPF A/C No: GPF Interest applied **GPF Balance:** 5,890,817.00 (provisional)
 Vendor Number: 30395367 - SHAMSHAD BIBI SDEO(F) Munda
Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 17 Pay Stage: 5

Wage type		Amount	Wage type		Amount
0001	Basic Pay	41,870.00	1001	House Rent Allowance 45%	6,650.00
1947	Medical Allow 15% (16-22)	1,847.00	2148	15% Adhoc Relief All-2013	660.00
2199	Adhoc Relief Allow @10%	452.00	2211	Adhoc Relief All 2016 10%	2,356.00
2224	Adhoc Relief All 2017 10%	4,187.00	2247	Adhoc Relief All 2018 10%	4,187.00
2265	Adhoc Relief All 2019 05%	2,093.00	2309	Adhoc Relief All 2021 10%	4,187.00
2315	Special Allowance 2021	6,074.00			0.00

Deductions - General

Wage type		Amount	Wage type		Amount
3017	GPF Subscription	-4,270.00	3501	Benevolent Fund	-1,500.00
3609	Income Tax	-1,717.00	3990	Emp.Edu. Fund KPK	-250.00
4004	R. Benefits & Death Comp:	-900.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 16,565.98 Recovered till MAR-2022: 11,415.00 Exempted: 0.02- Recoverable: 5,151.00

Gross Pay (Rs.): 74,563.00 Deductions: (Rs.): -8,637.00 Net Pay: (Rs.): 65,926.00

Payee Name: SHAMSHAD BIBI
 Account Number: PLS 1300-2
 Bank Details: NATIONAL BANK OF PAKISTAN, 231450 N.B.P.TIGARAT GANJ D.I.KHAN N.B.P.TIGARAT GANJ D.I.KHAN,

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address: DIKHAN City: D.I.KHAN Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official
 Temp. Address: City: Email: asifmaths43@gmail.com

Better Copy

Amir (B)

(14)



Government of Khyber Pakhtunkhwa
 ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
 Block- "A" Opposite MPS's Hostel, Civil Secretarial Peshawar
 Phone: 091-9210480, Fax # 091-9211419

(8)

NOTIFICATIONDated Peshawar August 9th, 2019 ✓

No. SO(S/F)E&SED/4-16/2019/Adjustment/MC: Consequent upon approval of the competent authority, the following Management Cadre, Assistant Sub Division Education Officers Sub Divisional Education Officers (Female) of E&SED are hereby adjusted against the mentioned posts, with immediate effect.

S#	Name of Officers	Adjustment Station	Remarks
1.	Mst. Maryam Rashid, SDEO (F) Nowhsara	SDEO (F) Town-I Peshawar	AVP
2.	Mst. Arifa Bibi, SDEHO (F) Sheringal Dir Upper.	SDEO (F) Drosh Chitral	Vice Sr. No. 4
3.	Mst. Zubaida Kharum, SDEO (F) Chitral	SDEO (F) Drosh Chitral	Vice Sr. No. 39 town pay & scale
4.	Mst. Musarrat Jamal, SDEO (F) Turekho Mulkhow Chitral	SDEO (F) Chitral	AVP
5.	Mst. Khudija Bibi, SDEO (F) Mardan	SDEO (F) Takht Bhai Mardan	Vice Sr. No. 39 town pay & scale
6.	Mst. Samina Iftikhar, SDEO (F) Shangin	SDEO (F) Katalang Mardan	AVP
7.	Mst. Shahza Ihsan, SDEO (F) Mardan	SDEO (F) Rustam Mardan	AVP own pay & scale
8.	Mst. Dil Raj, ASDEO (F) Swabi	SDEO (F) Razzar Swabi	AVP own pay & scale
9.	Mst. Shangufta Jabeen, SDEO (F) Daggar Bunir	SDEO (F) Chota Lahore Swabi	Vice Sr. No. 36
10.	Mst. Zakia Raza, SDEO (F) Swat	SDEO (F) Babozai Swat	Vice Sr. No. 39 town pay & scale
11.	Mst. Fazilat, SDEO (F) Swat	SDEO (F) Barikot Swat	Vice Sr. No. 39 town pay & scale
12.	Mst. Saima Bibi, SDEO Babozia (F) Swat	SDEO (F) Behran Swat	Vice Sr. No. 39 town pay & scale
13.	Mst. Nabeed Akhtar, SDEO (F) Swat	SDEO (F) Kabat Swat	Vice Sr. No. 39 town pay & scale
14.	Mst. Rukhsana Naz, SDEO (F) Swat	SDEO (F) Matta Swat	Vice Sr. No. 39 town pay & scale
15.	Mst. Safia, SDEO (F) Bakhtela Matakand	SDEO (F) Batkhela Malakand	Vice Sr. No. 39 town pay & scale
16.	Mst. Arifa, SDEO (F) Torghar	SDEO (F) Manshra	AVP
17.	Mst. Sabrina Ambreen, SDEO (F) Charbagh Swat	SDEO (F) Domail Bannu	Vice Sr. No. 20
18.	Mst. Nayyar Sultana, SDEO (F) Charbagh Swat	SDEO (F) Daraban Khan D.I.Khar	AVP

Attested

19	Mst. Sonia Nawaz Baloch, SDEO (F) Mandar Bunir	SDEO (F) Paharpura D.I.Khan	AVP
20.	Mst. Saima Bashir, SDEO (F) Dqmail Bannu	SDEO (F) Kulachi D.I,Khan	AVP
21.	Mst. Farhat Yasmin, SDEO (F) Charbagh Tank	SDEO (F) D.I.Khan	AVP
22.	Mst. Shamshad Bibi, SDEO (F) Munda Dir Lower	SDEO (F) Tank	AVP
23.	Mst. Nasim Begum, ASDEO (F) Balambat Dir Lower	SDEO (F) Balambat Dir Lower	AVP (own pay & scale)
24.	Mst. Yasmin, Akhtar, ASDEO (F) Khaill Dir Lower	SDEO (F) Khall Dir Lower	AVP (own pay & scale)
25.	Mst. Ayesha, ASDEO Alpuri (F) Shangla	SDEO (F) Alpuri Shangla	AVP (own pay & scale)
26.	Mst. Shaista, A SDEO (F) Shabqadar Charsadda	SDEO (F) Shabqadar Charsadda	Vice Sr. No. 27 (own pay & scale)
27.	Mst. Zeebat Bibi, ASDEO (F) Shabqadar Charsadda	SDEO (F) Charsadda	AVP
28.	Mst. Shela Naz, ASDEO (F) Wari Dir Upper	SDEO (F) Tangi Charsadda	AVP
29.	Mst. Nazia Anjum (MC-BS-17) services at the disposal of Directorate of E&SE	SDEO (F) Pabbi Nowshera	AVP
30.	Mst. Nasira Naseem, ASDEO (F) Palas Kohistan	SDEO (F) Kolai Pallas Kohistan	Vice Sr. No. 34 (own pay & scale)
31.	Mst. Maryum aMAN, SDEO (F) Shabqadar Malakand	Assistant Director, Directorate of E&SE	Vice Sr. NO. 38
32.	Mst. Asfia Amin, SDEO (F) Kohat	SDEO (F) Tall Hangu	Vice Sr. NO. 33
33.	Mst. Shaista, SDEO (F) Shabqadar Charsadda	SDEO (F) Kohat	Vice Sr. NO. 32

CONSEQUENTIAL TRANSFERS

34.	Mst. Shams-ul-Hadi, HM (BS-17) working as SDEO (F) Kolai Pallas Kohistan	Services placed at the disposal of Directorate of E&SE	
35.	Mst. Zahida Begum, SST working as SDEO (F) Matta Swat	Services placed at the disposal of Directorate of E&SE	
36.	Mst. Shaheen Begum, SS (BS-17) working as SDEO (F) Chota Lahore Swabi	Services placed at the disposal of Directorate of E&SE	
37.	Mst. Shah Nazar, SDEO (F) Patten Kohistan	Services placed at the disposal of Directorate of E&SE	
38.	Mst. Shahnaz, HM (BS-17) working as Assistant Director, Directorate of E&SE	Services placed at the disposal of Directorate of E&SE	
39.	Mst. Rana Atta Ullah, Headmistress (BS-17) SDEO (F) Takht Bhai Maridan	Services placed at the disposal of Directorate of E&SE	

Alleged

2. The above order will be effective subject to the condition that the officer posted in their own pay & scale will give an undertaking/ Affidavit/ on legal/ stamp paper to Secretary E&SE/ Directorate E&SE, Peshawar to the effect that they will not claim benefits of graded pay and seniority of the higher pay scale.

3. No TA/DA is allowed.

SECRETARY
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Endst: of even No. & date:

Copy forwarded to the: /

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officers (Female) concerned.
4. District Accounts Officers concerned.
5. PS to Secretary E&SE Department.
6. In-charge EMISE, E&SE Department for uploading at official website at the earliest.
7. Officers concerned.
8. Office order file.

(GUL RUKH)
Section Office (School Female)



GOVERNMENT OF KHYBER PAKHTUNKHWA
 ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
 Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
 Phone: 091-9210480, Fax: 091-9211410

Dated Peshawar the August 9th 2019

NOTIFICATION

No. SOCS/EE&SED/3-16/2019/Adjustment/MIC; Consequent upon approval of the Competent Authority, the following Management Cadre, Assistant Sub-Division Education Officers, Sub-Divisional Education Officers (Female) of E&SED are hereby adjusted against the mentioned posts, with immediate effect:

APR 3/

Sr	Name of Officers	Adjustment Station	Remarks
1	Mrs. Maryam Rashid, SDEO (F) Peshawar	SDEO (F) Town-I Peshawar	AVP
2	Mrs. Arooj Bibi, SDEO (F) Sherpora Dir Upper	SDEO (F) Turkho-Mulkhow Chitral	Vice Sr. No. 4
3	Mrs. Zebaida Khattun, ASDEO (F) Chitral	SDEO (F) Drosh Chitral	AVP (own pay & scale)
4	Mrs. Noor-ul-Jamal, SDEO (F) Turkho-Mulkhow Chitral	SDEO (F) Chitral	AVP
5	Mrs. Khudija Bibi, ASDEO (F) Mardan	SDEO (F) Takht Bhai Mardan	Vice Sr. No. 39 (own pay & scale)
6	Mrs. Samina (Rukhar), SDEO (F) Shangla	SDEO (F) Katalang Mardan	AVP
7	Mrs. Shahbaz, Hisan, ASDEO (F) Mardan	SDEO (F) Rustam Mardan	AVP (own pay & scale)
8	Mrs. Gul Raj, ASDEO (F) Swabi	SDEO (F) Razzar Swabi	AVP (own pay & scale)
9	Mrs. Shagufta Iqbal, SDEO (F) Dargah Dur	SDEO (F) Chota Lahore Swabi	Vice Sr. No. 36
10	Mrs. Zakia Raza, ASDEO (F) Swat	SDEO (F) Babozai Swat	AVP (own pay & scale)
11	Mrs. Fazilat, ASDEO (F) Swat	SDEO (F) Barikot Swat	AVP (own pay & scale)
12	Mrs. Saima Bibi, ASDEO (F) Swat	SDEO (F) Behram Swat	AVP (own pay & scale)
13	Mrs. Nabeed Akhtar, ASDEO (F) Swat	SDEO (F) Kabal Swat	AVP (own pay & scale)
14	Mrs. Rubiana Niaz, ASDEO (F) Swat	SDEO (F) Maita Swat	Vice Sr. No. 35 (own pay & scale)
15	Mrs. Sultana, ASDEO (F) Bakhela Malakand	SDEO (F) Bakhela Malakand	AVP (own pay & scale)
16	Mrs. Aysha, SDEO (F) Torghar	SDEO (F) Manshara	AVP
17	Mrs. Sabeena Ambreen, SDEO (F) Lal Ditta Dir Lower	SDEO (F) Domail Bannu	Vice Sr. No. 20
18	Mrs. Maryam Sultana, SDEO (F) Charbagh Swat	SDEO (F) Daraban Kohat	AVP

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18	Mst. Samra Nawaz Gulachi, SDEO (F) Mandar Dumar	SDEO (F) Paharpura D.I Khan	AVP
19	Mst. Samra Begum, SDEO (F) Dera Ghisshar	SDEO (F) Kulachi D.I Khan	AVP
20	Mst. Farhat Yasmin, SDEO (F) Tangi	SDEO (F) D.I Khan	AVP
21	Mst. Shamsud Bibi, SDEO (F) Mandar Dir Lower	SDEO (F) Tangi	AVP
22	Mst. Nasim Begum, ASDEO (F) Balambat Dir Lower	SDEO (F) Balambat Dir Lower	AVP (own pay & scale)
23	Mst. Yasmin Akhtar, ASDEO (F) Khall Dir Lower	SDEO (F) Khall Dir Lower	AVP (own pay & scale)
24	Mst. Ayesha, ASDEO (F) Shangha	SDEO (F) Alpuri Shangha	AVP (own pay & scale)
25	Mst. Shaima, ASDEO (F) Shubqadar Charsadda	SDEO (F) Shubqadar Charsadda	Vice Sr. No. 27 (own pay & scale)
26	Mst. Zeemat Bibi, SDEO (F) Shubqadar Charsadda	SDEO (F) Charsadda	AVP
27	Mst. Shehla Nbz, SDEO (F) War Dir Upper	SDEO (F) Tangi Charsadda	AVP
28	Mst. Nazia Anjum (MC-BS-17) services at the disposal of Directorate of E&SE	SDEO (F) Pabbi Nowshera	AVP
29	Mst. Nasim Naseem, ASDEO (F) Palas Kohistan	SDEO (F) Kolai Pallas Kohistan	Vice Sr. No. 34 (own pay & scale)
30	Mst. Maryum Amin, SDEO (F) Mulkand	Assistant Director, Directorate of E&SE	Vice Sr. No. 38
31	Mst. Asfay Amin, SDEO (F) Kohat	SDEO (F) Tall Hangu	Vice Sr. No. 33
32	Mst. Meher-un-Nisa, SDEO (F) Tall Hangu	SDEO (F) Kohat	Vice Sr. No. 32

CONSEQUENTIAL TRANSFERS

33	Mr. Shams-ud-Dadi, IIM (BS-17) working as SDEO (F) Kolai Pallas Kohistan	Services placed at the disposal of Directorate of E&SE	
34	Mst. Zahida Begum, SST working as SDEO (F) Mana Swat	Services placed at the disposal of Directorate of E&SE	
35	Mst. Shubeen Begum, SS (BS-17) working as SDEO (F) Chola Lahore Swat	Services placed at the disposal of Directorate of E&SE	
36	Mr. Shah Nazar, SDEO (F) Patten Kohistan	Services placed at the disposal of Directorate of E&SE	
37	Mst. Shahnaz Akhtar, IIM (BS-17) working as Assistant Director, Directorate of E&SE	Services placed at the disposal of Directorate of E&SE	
38	Mst. Rana Aida Ullah, Headmistress (BS-17) SDEO (F) Takhi Bhai Mardan	Services placed at the disposal of Directorate of E&SE	

Attached

The above order will be effective subject to the condition that the officers posted in their own pay & scale will give an undertaking/ Affidavit on legal stamp paper to Secretary, E&S, Directorate E&SE, Peshawar to the effect that they will not claim benefits of graded pay and seniority of the higher pay scale.

No TADA is allowed.

SECRETARY
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Enclst: of even No. & date:

Copy forwarded to the:

- 1. Accountant General Khyber Pakhtunkhwa, Peshawar.
- 2. Director E&SE, Khyber Pakhtunkhwa, Peshawar.
- 3. District Education Officers (Female) concerned.
- 4. District Accounts Officers concerned.
- 5. PS to Secretary E&SE Department.
- 6. In-charge EMISE, E&SE Department for uploading at official website at the earliest.
- 7. Officers concerned.
- 8. Office order file.

(GULREZ KHATUN)
SECTION OFFICER (SCHOOLS FEMALE)

AM/17/10/2021
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Dated Peshawar the, October 07th, 2021

NOTIFICATION

No. SO(S/F) E&SED/4-16/2021/POSTING/TRANSFERS/MC: The Competent authority, in compliance with the decision of the Provincial Cabinet, is pleased to order the posting // transfers of the following Sub Divisional Education Officers (SDEOs BS-17) of the Elementary & Education Department, Khyber Pakhtunkhwa, in the public interest, with immediate effect: -

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



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

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

Handwritten signatures and initials, including "M. Arif" and "M. Arif" with a large flourish.



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

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

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Endst: of Even No & date

Copy forwarded for information to the:-

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

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

Attended
3



Better Copy

(S)
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Government of Khyber Pakhtunkhwa
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block- "A" Opposite MPS's Hostel, Civil Secretarial Peshawar
Phone: 091-9210480, Fax # 091-9211419

NOTIFICATION

Dated Peshawar August 9th, 2019

No. SO(S/F)E&SED/4-16/2019/Adjustment/MC: Consequent upon approval of the competent authority, the following Management Cadre, Assistant Sub Division Education Officers Sub Divisional Education Officers (Female) of E&SED are hereby adjusted against the mentioned posts, with immediate effect.

S#	Name of Officers	Adjustment Station	Remarks
1.	Mst. Maryam Rashid, SDEO (F) Nowhsera	SDEO (F) Town-I Peshawar	AVP ²
2.	Mst. Ariba Bibi, SDEHO (F) Sheringal Dir Upper	SDEO (F) Drosh Chitral	Vice Sr. No. 4
3.	Mst. Zubaida Kharum, SDEO (F) Chitral	SDEO (F) Drosh Chitral	Vice Sr. No. 39 town pay & scale
4.	Mst. Musarrat Jamal, SDEO (F) Turkhot Mulkhow Chitral	SDEO (F) Chitral	AVP
5.	Mst. Khudija Bibi, SDEO (F) Mardan	SDEO (F) Takht Bhai Mardan	Vice Sr. No. 39 town pay & scale
6.	Mst. Samina Iftikhar, SDEO (F) Shangla	SDEO (F) Katalang Mardan	AVP
7.	Mst. Shahnza Ihsan, SDEO (F) Mardan	SDEO (F) Rustam Mardan	AVP own pay & scale
8.	Mst. Dil Raj, ASDEO (F) Swabi	SDEO (F) Razzar Swabi	AVP own pay & scale
9.	Mst. Shangufta Jabeen, SDEO (F) Daggar Bunir	SDEO (F) Chota Lahore Swabi	Vice Sr. No. 36
10.	Mst. Zakia Raza, SDEO (F) Swat	SDEO (F) Babozai Swat	Vice Sr. No. 39 town pay & scale
11.	Mst. Fazilat, SDEO (F) Swat	SDEO (F) Barikot Swat	Vice Sr. No. 39 town pay & scale
12.	Mst. Saima Bibi, SDEO Babozia (F) Swat	SDEO (F) Behran Swat	Vice Sr. No. 39 town pay & scale
13.	Mst. Nahced Akhtar, SDEO (F) Swat	SDEO (F) Kabat Swat	Vice Sr. No. 39 town pay & scale
14.	Mst. Rukhsana Naz, SDEO (F) Swat	SDEO (F) Matta Swat	Vice Sr. No. 39 town pay & scale
15.	Mst. Safia, SDEO (F) Bakhtela Matakand	SDEO (F) Batkhela Malakand	Vice Sr. No. 39 town pay & scale
16.	Mst. Arifa, SDEO (F) Torghar	SDEO (F) Manshra	AVP
17.	Mst. Sabrina Ambreen, SDEO (F) Charbagh Swat	SDEO (F) Domail Bannu	Vice Sr. No. 20
18.	Mst. Nayyar Sultana, SDEO (F) Charbagh Swat	SDEO (F) Daraban Khan D.I.Khan	AVP

19	Mst. Sonia Nawaz Baloch, SDEO (F) Mandar Bunir	SDEO (F) Paharpura. D.I.Khan	AVP
20	Mst. Saima Bashir, SDEO (F) Domail Bannu	SDEO (F) Kulachi D.I.Khan	AVP
21	Mst. Farhat Yasmin, SDEO (F) Charbagh Tank	SDEO (F) D.I.Khan	AVP
22	Mst. Shamsah Bibi, SDEO (F) Munda Dir Lower	SDEO (F) Tank	AVP
23	Mst. Nasim Begum, ASDEO (F) Balambat Dir Lower	SDEO (F) Balambat Dir Lower	AVP (own pay & scale)
24	Mst. Yasmin Akhtar, ASDEO (F) Khaill Dir Lower	SDEO (F) Khaill Dir Lower	AVP (own pay & scale)
25	Mst. Ayesha, ASDEO Alpuri (F) Shangla	SDEO (F) Alpuri Shangla	AVP (own pay & scale)
26	Mst. Shaista, A SDEO (F) Shabqadar Charsadda	SDEO (F) Shabqadar Charsadda	Vice Sr. No. 27 (own pay & scale)
27	Mst. Zeenat Bibi, ASDEO (F) Shabqadar Charsadda	SDEO (F) Charsadda	AVP
28	Mst. Shela Naz, ASDEO (F) Wari Dir Upper	SDEO (F) Tangi Charsadda	AVP
29	Mst. Nazia Anjum (MC-BS-17) services at the disposal of Directorate of E&SE	SDEO (F) Pabbi Nowshera	AVP
30	Mst. Nasira Naseem, ASDEO (F) Palas Kohistani	SDEO (F) Kolai Pallas Kohistan	Vice Sr. No. 34 (own pay & scale)
31	Mst. Maryum aMAN, SDEO (F) Shabqadar Malakand	Assistant Director, Directorate of E&SE	Vice Sr. NO. 38
32	Mst. Asfia Amin, SDEO (F) Kohat	SDEO (F) Tall Hangu	Vice Sr. NO. 33
33	Mst. Shaista, SDEO (F) Shabqadar Charsadda	SDEO (F) Kohat	Vice Sr. NO. 32
CONSEQUENTIAL TRANSFERS			
34	Mst. Shams-ul-Hadi, HM (BS-17) working as SDEO (F) Kolai Pallas Kohistan	Services placed at the disposal of Directorate of E&SE	
35	Mst. Zahida Begum, SST working as SDEO (F) Mattu Swat	Services placed at the disposal of Directorate of E&SE	
36	Mst. Shaheen Begum, SS (BS-17) working as SDEO (F) Chota Lahore Swabi	Services placed at the disposal of Directorate of E&SE	
37	Mst. Shah Nazir, SDEO (F) Patten Kohistan	Services placed at the disposal of Directorate of E&SE	
38	Mst. Shahnaz, HM (BS-17) working as Assistant Director, Directorate of E&SE	Services placed at the disposal of Directorate of E&SE	
39	Mst. Rana Atta Ullah, Headmistress (BS-17) SDEO (F) Takhi Bhai Mardan	Services placed at the disposal of Directorate of E&SE	

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(2)

Amir

2. The above order will be effective subject to the condition that the officer posted in their own pay & scale will give an undertaking/ Affidavit/ on legal/ stamp paper to Secretary E&SE/ Directorate E&SE, Peshawar to the effect that they will not claim benefits of graded pay and seniority of the higher pay scale.

3. No TA/DA is allowed.

SECRETARY
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Endst: of even No. & date:

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officers (Female) concerned.
4. District Accounts Officers concerned.
5. PS to Secretary E&SE Department.
6. In-charge EMISE, E&SE Department for uploading at official website at the earliest.
7. Officers concerned.
8. Office order file.

(GUL RUKH)
Section Office (School Female)

GOVERNMENT OF KHYBER PAKHTUNKHWA
 ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
 Block-A, Opposite MVA's Hospital, Civil Secretariat Peshawar
 Phone: 091-9210480, Fax: 091-9211419



NOTIFICATION
 Dated Peshawar the 21st day of 2019
 No. SOS/DF&SE/16/2019/ADJUSTMENT/1/13
 In consequence of the approval of the
 Competent Authority, the following Management Cadre Assistant Sub-Division Education Officers
 Sub-Division Education Officers (Female) of (B&S) are hereby adjusted against the mentioned
 posts with immediate effect:

No.	Name of Officers	Adjustment Station	Remarks
1	Mrs. Maryam Rashid, SDEO (F)	Town-Teshwar	
2	Mrs. Muneer Bibi, SDEO (F)	Town-Teshwar	
3	Mrs. Muneer Bibi, SDEO (F)	Town-Teshwar	
4	Mrs. Zohra Khatun, ASDEO (F)	Chitral	
5	Mrs. Zohra Khatun, ASDEO (F)	Chitral	
6	Mrs. Muneer Bibi, SDEO (F)	Chitral	
7	Mrs. Muneer Bibi, SDEO (F)	Chitral	
8	Mrs. Muneer Bibi, SDEO (F)	Chitral	
9	Mrs. Muneer Bibi, SDEO (F)	Chitral	
10	Mrs. Muneer Bibi, SDEO (F)	Chitral	
11	Mrs. Muneer Bibi, SDEO (F)	Chitral	
12	Mrs. Muneer Bibi, SDEO (F)	Chitral	
13	Mrs. Muneer Bibi, SDEO (F)	Chitral	
14	Mrs. Muneer Bibi, SDEO (F)	Chitral	
15	Mrs. Muneer Bibi, SDEO (F)	Chitral	
16	Mrs. Muneer Bibi, SDEO (F)	Chitral	
17	Mrs. Muneer Bibi, SDEO (F)	Chitral	
18	Mrs. Muneer Bibi, SDEO (F)	Chitral	

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20	Mst. Samra Siddiq, (F) Munda Dir Lower	SDEO (F) Paltarpura D.I.Khan	AVP
21	Mst. Samra Bieghar, SDEO (F) Damaul Haamul	SDEO (F) Kotalchi D.I.Khan	AVP
22	Mst. Parhat Yasmin, SDEO (F) Fawc	SDEO (F) D.I.Khan	AVP
23	Mst. Shamsahad Bibi, SDEO (F) Munda Dir Lower	SDEO (F) Tank	AVP
24	Mst. Nasim Begum, ASDEO (F) Balambat Dir Lower	SDEO (F) Balambat Dir Lower	AVP (own pay & scale)
25	Mst. Yasmin Akhtar, ASDEO (F) Khall Dir Lower	SDEO (F) Khall Dir Lower	AVP (own pay & scale)
26	Mst. Ayesha, ASDEO (F) Alpuri Shangla	SDEO (F) Alpuri Shangla	AVP (own pay & scale)
27	Mst. Shauzia, ASDEO (F) Shabqadar Charsadda	SDEO (F) Shabqadar Charsadda	Vice Sr. No. 27 (own pay & scale)
28	Mst. Zeenat Bibi, SDEO (F) Shabqadar Charsadda	SDEO (F) Charsadda	AVP
29	Mst. Shaila Niz, SDEO (F) War Dir Upper	SDEO (F) Tangi Charsadda	AVP
30	Mst. Nazia Arjum (MC-BS-17) services at the disposal of Directorate of E&SE	SDEO (F) Paltip Nowshera	AVP
31	Mst. Nasim Naseem, ASDEO (F) Pallas Kohistan	SDEO (F) Kotal Pallas Kohistan	Vice Sr. No. 31 (own pay & scale)
32	Mst. Maryam Anon, SDEO (F) Mithakand	Assistant Director, Directorate of E&SE	Vice Sr. No. 32
33	Mst. Aslia Amla, SDEO (F) Kohat	SDEO (F) Tall Hangu	Vice Sr. No. 33
34	Mst. Meher-un-Nisa, SDEO (F) Tall Hangu	SDEO (F) Kohat	Vice Sr. No. 34
CONSEQUENTIAL TRANSFERS			
35	Mst. Sharza ul-Hadi, IM (BS-17) working as SDEO (F) Kotal Pallas Kohistan	Services placed at the disposal of Directorate of E&SE	
36	Mst. Zahida Begum, SST working as SDEO (F) Mulla Swat	Services placed at the disposal of Directorate of E&SE	
37	Mst. Shabeen Begum, SST (BS-17) working as SDEO (F) Chola Lahore Swabi	Services placed at the disposal of Directorate of E&SE	
38	Mst. Shah Nazir, SDEO (F) Paltip Kohistan	Services placed at the disposal of Directorate of E&SE	
39	Mst. Shahnaz Akhtar, IM (BS-17) working as Assistant Director, Directorate of E&SE	Services placed at the disposal of Directorate of E&SE	
40	Mst. Rana Aftab Ullah, Headmistress, (BS-17) SDEO (F) TARRI BHAI Mardah	Services placed at the disposal of Directorate of E&SE	

7/10/20

2. The above order will be effective subject to the condition that the officers posted in their own pay & scale will give an undertaking/ Affidavit on legal stamp paper to Secretary E&SE Directorate E&SE, Peshawar to the effect that they will not claim benefits of graded pay and seniority of the higher pay scale.

No TADA is allowed.

SECRETARY
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Enclst: of even No. & date:

- Copy forwarded to the:
- 1. Accountant General Khyber Pakhtunkhwa, Peshawar.
- 2. Director E&SE, Khyber Pakhtunkhwa, Peshawar.
- 3. District Education Officers (Female) concerned.
- 1. District Accounts Officers concerned.
- 5. PS to Secretary E&SE Department.
- 6. In-charge EMISE, E&SE Department for uploading at official website at the earliest.
- 7. Officers concerned.
- 8. Office order file.

Attch

(GUR KH)
SECTION OFFICER (SCHOOLS FEMALE)



Dated Peshawar the, October 07th, 2021

NOTIFICATION

No.SO(S/F) E&SED/4-16/2021/POSTING/TRANSFERS/MC: The Competent authority, in compliance with the decision of the Provincial Cabinet, is pleased to order the posting / transfers of the following Sub Divisional Education Officers (SDEOs BS-17) of the Elementary & Education Department, Khyber Pakhtunkhwa, in the public interest, with immediate effect:-

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



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9221388

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

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

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

SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Endst: of Even No & date

Copy forwarded for information to the: -

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

Attended
33

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

714819

GOVERNMENT OF KHYBER
ELEMENTARY AND SECONDARY ED
Block-"A" Opposite MPA's Hostel, C... .. Peshawar
Phone No. 091-9223588

(26) (F)
NKHWA
PARTMENT
Peshawar

Dated Peshawar the January 12th 2022

NOTIFICATION

IO SO(MC)E&SED/4-16/2021/POSTING/TRANSFER/MC: The Competent Authority is pleased to order the posting/transfer of the following Management Cadre officers of Elementary & Secondary Education, Khyber Pakhtunkhwa with immediate effect, in the public interest:-

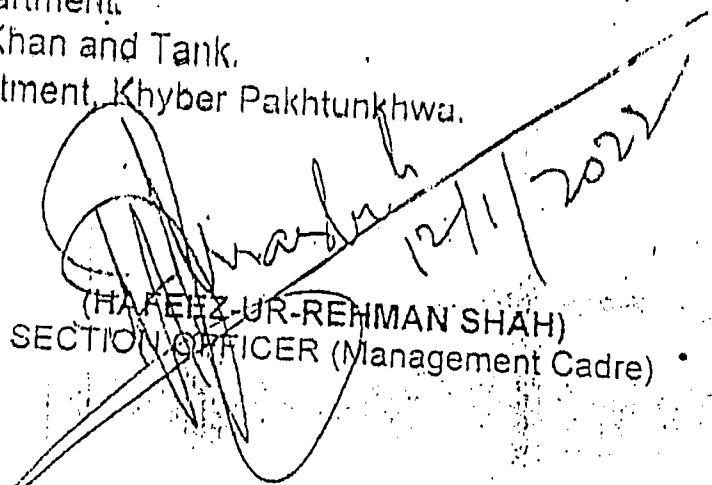
Sr. No	Name & designation	From	To
1	Mst. Shamshad Bibi (MC BS-17)	SDEO (Female) Pharpur DI Khan	SDEO (Female) Tank (Vice No-2)
2	Mst. Sonia Nawaz (MC BS-17)	SDEO (Female) Tank	SDEO (Female) Pharpur DI Khan (Vice No-1)

SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Indst: of even No. & date:

Copy forwarded for information to the:-

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


(HAFEEZ-UR-REHMAN SHAH)
SECTION OFFICER (Management Cadre)



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 posting/transfers of their choice and against the public interest.
- iii) All contract Government employees appointed against specific posts, can not be posted against any other post.
- iv) The normal tenure of posting shall be three years subject to the condition that for the officers/officials posted in unattractive areas the tenure shall be two years and for the hard areas the tenure shall be one year. The unattractive and hard areas will be notified by the Government.
- v) While making postings/transfer from settled areas to FATA and vice-versa, specific approval of Governor, NWFP needs to be obtained
- vi) While making postings/transfers of officers/officials up to BS-17, from settled areas to FATA and vice-versa approval of the Chief Secretary NWFP needs to be obtained. Whereas, in case of posting/transfer of officers in BS-13 and above, from settled areas to FATA and vice versa, specific approval of the Governor NWFP shall be obtained.
- vi (n) 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 (Thana) 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.
- x) All the posting/transferring authorities may facilitate the posting/transfer of the unmarried female government servants at the station of the residence of their parents.

ATTESTED

to be true for
Advocate

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

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- (xi) Officers/officers, except DCOs and DPOs/SPs who are due to retire within one year may be posted from their position 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

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

to be true copy
Advocate

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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)

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

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

ATTESTED

Transfer/Postings from settled to FATA including F.Rs to Districts.

SI.No.5

Instances have come to the notice of Governor's Secretariat NWFP, where policy on posting/transfer to and from FATA is not being followed in letter and spirit. The Governor, NWFP has taken serious notice of the violation of the said policy and directed that all Departments must obtain his prior approval before issuing all such posting/transfer orders.

(Authority: SOR.I(S&GAD)1-188/96, dated 2nd Oct.,1997)

Inter Provincial Transfer

SI.No.6

Attention is invited to Rule-8 of the NWFP, Civil Servants(Appointment, Promotion and Transfer) Rules, 1989 where under Inter-Provincial Transfers of employees in BPS 1 to 15 and 16 and above are permissible subject to the fulfilment of conditions laid down in the aforesaid rule. However, in most of the cases, the requests for Inter-Provincial Transfers are not strictly scrutinized in the light of the aforesaid rules which creates not only embarrassment for the S&GAD but also causes delays in finalizing of such cases.

2. While examining cases, it has been noticed that inter-provincial transfer results in an over all increase of officials in the NWFP, which is against the downsizing policy of the Government. The unemployment situation in NWFP is more acute than in any other province. Large scale transfers of officials from other provinces would also deprive the people of NWFP from employment in other Provinces. It may, therefore, be necessary to restrict the inter-provincial transfers to very exceptional cases where a strong humanitarian ground exists or where technical expertise, which is not available in the province, is required.

3. It is requested that the provisions of Rule-8 of the NWFP Civil Servants(Appointment, Promotion and Transfer) Rules, 1989 may be observed strictly while recommending cases of inter-provincial transfers, with full justification for consideration of the competent authority.

(Authority: S&GAD's letter No.SORI(S&GAD)2-27/86, dated 1.11.1997)

Posting/Transfer in Government Departments

SI.No.7

In supersession of all policy instructions issued in this behalf, the Provincial Cabinet meeting held on 25.10.98 has inter-alia approved the following posting/transfer policy:-

(i) The normal tenure of posting shall be three years subject to the conditions that for the officers/officials posted in unattractive areas, the tenure shall be two years and for the hard areas i.e (District Kohistan), it shall be 1-1/2 years at least.

(ii) Months of March and August are fixed for posting/transfer of the officers/officials excluding the officers in BP-19 and above in the Province. There should be a ban on posting/transfers throughout the year excluding the aforesaid two months. However, there shall be no restriction in cases where:-

(a) Postings/transfers of Government employees become inevitable in other months due to promotion/retirement/ creation of new posts/return from long leave/involvement in disciplinary proceedings and adjustment of surplus staff.

(b) Postings of existing officers of the APUG, PCS(FG) and PCS (SG) and Heads of Attached Departments and other B-19 and above officers in all the departments as indicated in Schedule-III of the NWFP Government Rules of Business, 1985 as well as Field posts and ex-cadre posts by the Chief Secretary and Chief Minister NWFP.

(iii) While making postings/transfers from settled areas to FATA and vice-versa, the approval of Governor, NWFP needs to be obtained.

(iv) No officer shall be allowed to be posted in his own District of domicile.

(v) No postings/transfers of the officers/officials on detailment basis shall be made.

(vi) About the posting of husband/wife, both in Provincial Services, at one station, the overriding consideration will be the administrative position. It may be desirable to post such persons at one station and this will be subject to the public interest.

2. It is requested that the above policy may please be implemented in letter and spirit.

(Authority: S&GAD's letter No.SOR.I(S&GAD)1-1/85, dt: 20.5.1998)

Posting/Transfer in Govt. Departments.

SI.No.8

I am directed to refer to the subject cited above and to say that in supersession of all policy instructions issued in this behalf, the competent authority has inter-alia approved the following posting/transfer policy:-

(i) 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

A

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Secretary
Primary and Secondary Education
D.I. Khan

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2
A

Subject: Appeal for the transfer to the nearest sub-division in D.I. Khan district

Respected Sir,

It is respectfully prayed that I may be transferred to the nearest sub-division of my home station (Sub-division Pharpur or Sub-division D.I. Khan) on the following sympathetic grounds for kind consideration.

That I am facing great hardship to carry out my duties in remote areas of district Tank where I have been threatened for taking actions against absent employees in various schools of the vicinity.

The liabilities of my children and my parents also compel me to carry out my duties in the nearest possible station as mentioned above because my elderly parents are entirely dependent on me for their daily care and diet. In case of any serious emergency my presence is of utmost importance as my husband is abroad and I have only brother who is also abroad and there is no male member to attend to any untoward situation (God forbid).

The remote station duty in Tank and daily journey has not only deteriorated my overall health but also my parents and children suffered adversely.

The language barrier is also one of the major hurdles in communication in the Pashto speaking environment.

The orders may please issued in the larger interest of my family and I may be placed in the nearest sub-division of my home district D.I. Khan to look after my elderly parents and attend my kids without any hardships.

I shall be extremely grateful for accepting my appeal as I have to carry out my duties as I have my husband works in KSA and he is not around to look after all the domestic matters and my kids and parents.

Your's truly,



Sohria Nawaz
SDEO Tank

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

Dated Peshawar the June 09th, 2022

NOTIFICATION

NO. SO(MC)E&SED/4-16/2021/POSTING/TRANSFER/MC: Mst. Sonia Nawaz (MC BS-17) SDEO (Female) Tank is hereby transferred and directed to immediately report to Directorate of Elementary & Secondary Education, Khyber Pakhtunkhwa.

SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Endat: of even No. & date:

Copy forwarded for information to the:-

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

Naseer
9.6.22

(NASEER ABBAS KHALIL)
SECTION OFFICER (Management Cadre)

3/6/22



Telephone & Fax: 0963-510380

Email: dcoftank@gmail.com

Facebook: [dcoftank](https://www.facebook.com/dcoftank)

Twitter: [dcofemaletank](https://twitter.com/dcofemaletank)

OFFICE OF THE
DISTRICT EDUCATION OFFICER (F) TANK

No. 4071 /AP/

Dated Tank the 09/06/2022

To

The worthy Secretary to Govt: of Khyber Pakhtunkhwa
E&SED Peshawar.

SUBJECT: UNETHICAL ATTITUDE OF SDEO-F TANK.

Memo:

Your worthy-self considerations are required on the following points.

1. That since the day, when one Ms. Sonia Nawaz walked in to this District as SDEO-F, this office become nightmare for District authorities as well as for lower formation staff.
2. That she did only one job quite effectively during her stay that is conspiracies and dramas.
3. That she never left bottle neck to defame this office's esteem.
4. That she had never keep regard of the undersigned which deserved officially to be done.
5. That she always used abusive language with the undersigned and evidences of the same can be provided for your consideration at any time.
6. That her presence always lead this office in dreadful state and primary schools under her jurisdiction are devastating for her negligence & "Back on wrong Horse" decisions.

Your worthy-self is therefore, requested that the aforementioned soul may be disposed-off from this District as a chain is no stronger than its weakest link please.

(AZRA BIBI)

District Education Officer (F)

District Tank

Phone.# 0963-510380



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9221488

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Dated Peshawar the June 10th, 2022

CORRIGENDUM:

NO.SO(MC)E&SED/4-16/2022/PT/POSTING/TRANSFER/MC: In partial modification of this Department's Notification of even number dated 30-05-2022, the following posting / transfers are hereby ordered, in the best public interest: -

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Sr. No	Name and designation	Under transfer as	New place of posting
1	Mr. Wali ur Rehman (MC BS-17)	SDEO (Male) Alai Battagram	SDEO (Male) Barawal Bandi, Dir Upper (AVP)
2	Mr. Said Zamin Shah (MC BS-17)	SDEO (Male) Nawagai, District Bajaur	SDEO (Male) Khwazakhela, District. Swat (AVP)
3	Mst. Noreen Saba (MC BS-17)	SDEO (Female) Harban Basha, Kohistan Upper	SDEO (Female) Tank (AVP)

SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Endst: of even No.& date:

Copy forwarded for information to the: -

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

Naseer
10.6.22

(NASEER ABBAS KHALIL)
SECTION OFFICER (Management Cadre)

Attached
[Signature]



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

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Dated Peshawar the June 27th, 2022

NOTIFICATION

NO. SO(MC)E&SED/4-16/POSTING/TRANSFER/MC: In compliance with the Order Sheet of Khyber Pakhtunkhwa Service Tribunal (Camp Court DI Khan) dated 31-01-2022 in Service Appeal No 137/2022, titled "Shamshad Bihi, SDEO (Female) VS Govt of Khyber Pakhtunkhwa & Others", this Department's Notification of even number dated 09-06-2022 regarding posting/transfer of Mst. Sonia Nawaz (MC BS-17) from the post of SDEO (Female) Tank, is hereby withdrawn *ab-initio*.

2- Consequent upon the above, Mst. Noreen Saba (MC BS-17) SDEO (Female) Tank is hereby transferred and posted as SDEO (Female) Hangu against the vacant post, in the best public interest.

SECRETARY TO THE GOVT. OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Index of copy No. & date:

Copy forwarded for information to the: -

1. Registrar Khyber Pakhtunkhwa Service Tribunal, Peshawar.
2. Accountant General, Khyber Pakhtunkhwa, Peshawar.
3. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
4. District Education Officers (Female) DI Khan, Tank and Hangu.
5. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
6. District Accounts Officers DI Khan, Tank and Hangu.
7. Section Officer (Litigation-II) E&SE Department with the direction to pursue the case in KP Service Tribunal Peshawar till final decision.
8. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
9. Officers concerned.
10. Master file.

Naseer
27.6.22

(NASEER ABBAS KHALIL)
SECTION OFFICER (Management Cadre)