

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. 1558/2019

Date of Institution ... 18.11.2019

Date of Decision ... 02.02.2022

Mst. Yahya Begum, Senior Instructor of Physical Education (BPS-18) GGCHSS,  
Peshawar under transfer to GGHSS Pir Pai, District Nowshera.

... (Appellant)

**VERSUS**

The Chief Secretary, Khyber Pakhtunkhwa, Peshawar and others.

... (Respondents)

Noor Muhammad Khattak,  
Advocate

... For Appellant

Muhammad Adeel Butt,  
Additional Advocate General

... For official respondents

**AHMAD SULTAN TAREEN**  
**ATIQ-UR-REHMAN WAZIR**

...  
...

**CHAIRMAN**  
**MEMBER (EXECUTIVE)**

**JUDGMENT**

**ATIQ-UR-REHMAN WAZIR MEMBER (E):-** Brief facts of the case are

that the appellant while serving as Senior Instructor of Physical Education BPS-18 was proceeded against on the charges of misconduct but the inquiry officer did not prove the allegations leveled against her, despite the respondents transferred her vide order dated 26-07-2019 as a penalty on administrative grounds. Feeling aggrieved, the appellant filed departmental appeal, which was not responded within the statutory period, hence the instant service appeal with prayers that the impugned order dated 26-07-2019 may be set aside and the appellant may not be transferred from government girl's comprehensive higher secondary school, Peshawar.


02. Learned counsel for the appellant has contended that the impugned order is against law, facts and norms of natural justice, therefore not tenable and liable to be set aside; that the appellant has not been treated in accordance with law and rules on the subject, as such, the respondents violated Article 4 and 25 of the Constitution; that the impugned order is against clauses-I and VII of the transfer/posting policy, therefore not tenable and liable to be set aside; that the respondents acted in arbitrary manner by issuing the impugned order against the appellant; that the appellant has been discriminated, as such the respondents violated the principle of natural justice; that neither the impugned order has been passed in public interest nor in exigency of service, rather was passed with malafide and as a punishment; that transfer is nowhere mentioned as punishment in Khyber Pakhtunkhwa Government Servant (Efficiency & Discipline) Rules, 2011, hence the punishment so awarded is not in conformity with rules.

WM  
03. Learned Additional Advocate General for the respondents has contended that the appellant is liable to serve anywhere in the province as per law and rule; that proper inquiry was conducted against the appellant and it was upon recommendation of the inquiry officer that the appellant was transferred from the school concerned; that under section 10 of Civil Servant Act, 1973, the competent authority is empowered to transfer a civil servant from one place to another in exigency of service and in the public interest; that the civil servant has no vested right to claim posting/transfer of her choice; that the appellant being cancer patient has an option of retirement on medical grounds as she is unable to perform her duty; that departmental appeal of the appellant was filed being devoid of merit; that the instant service appeal of the appellant also being devoid of merit may be dismissed.

04. We have heard learned counsel for the parties and have perused the record.

05. Record reveals that an inquiry was conducted against principal of the school, where the appellant was also posted as vice principal. The allegations against the appellant were that she had invited and allowed media persons inside the school. As per findings of the inquiry report, the appellant was exonerated of the rest of the charges, but it was suggested that she might be transferred from that school. As per recommendations of the inquiry officer, the appellant was transferred vide impugned order dated 26-07-2019 .We have observed that the appellant was transferred on administrative grounds. Learned counsel for official respondents, when confronted with the situation as to whether transfer can be taken as a punishment ,was unable to show any plausible reply, which shows malafide on part of the respondents and on this score alone, the impugned transfer order is liable to be set aside. The respondents also violated transfer/posting policy notified by the provincial government read with letter of the establishment department dated 27-02-2013 pertaining to posting/transfer.

Attention is drawn to para-2 of the said letter, which is reproduced as under;



*"Tenure, posting and transfer; when the ordinary tenure for a posting has been specified in the law or rules made thereunder, such tenure must be respected and cannot be varied, except for compelling reasons, which should be recorded in writing and are judicially reviewable."*

Moreover transfer on administrative ground is not permissible under the law, this issue has already been thrashed out and settled in various judgments relied upon by the learned counsel for the appellant that transfer of a civil servant could not be made on the basis of complaint because transfer had not been mentioned as punishment in the penalty list in the rules and regulations regarding the conduct of civil servants. Reliance is placed on 2015 PLC (CS) 1035 and 2012 PLC (CS) 187. We are of the considered view that the impugned transfer order was made on malafide on part of the respondents, administrative expediencies

and without taking into consideration the illness of the appellant, hence is illegal, unlawful and not tenable in the eye of law and is liable to be struck down.

06. As a sequel to above discussion, the instant appeal is accepted. The impugned transfer order dated 26-07-2019 is set aside and the appellant is allowed to complete her tenure in GGCHSS Peshawar. Parties are left to bear their own costs. File be consigned to record room.

ANNOUNCED

02.02.2022



(AHMAD SULTAN TAREEN)  
CHAIRMAN



(ATIQ-UR-REHMAN WAZIR)  
MEMBER (E)

ORDER  
02.02.2022

Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General for official respondent present. Arguments heard and record perused.

Vide our detailed judgment of today, separately placed on file, the instant appeal is accepted. The impugned transfer order dated 26-07-2019 is set aside and the appellant is allowed to complete her tenure in GGCHSS Peshawar. Parties are left to bear their own costs. File be consigned to record room.

ANNOUNCED  
02.02.2022



(AHMAD SULTAN TAREEN)  
CHAIRMAN

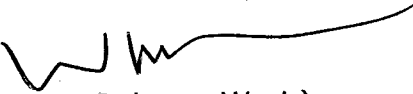


(ATIQ-UR-REHMAN WAZIR)  
MEMBER (E)

31.01.2022

Mr. Noor Muhammad Khattak, Advocate for appellant present. Mr. Muhammad Adeel Butt, Addl. AG for respondents present.

Arguments heard. Learned AAG seeks short adjournment in order to solve the issue amicably. To come up for order on 01.02.2022 before the D.B.


  
(Atiq-Ur-Rehman Wazir)  
Member (E)

  
Chairman

01.02.2022

Counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl. AG for respondents present.

On the request of learned AAG another opportunity is granted. To come up for order on 02.02.2022 before the D.B.


  
(Atiq-Ur-Rehman Wazir)  
Member (E)

  
Chairman

24.03.2021

Junior to counsel for the appellant and Asstt. AG alongwith Syed Nasirud Din, Asstt. for the respondents present.

Former requests for adjournment due to illness of senior counsel. Adjourned to 30.04.2021 for hearing before the D.B.

  
(Atiq-ur-Rehman Wazir)  
Member(E)

Chairman

30.04.2021

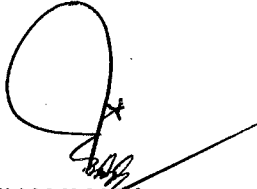
Due to demise of the Worthy Chairman, the Tribunal is non-functional, therefore, case is adjourned to 26.08.2021 for the same as before.

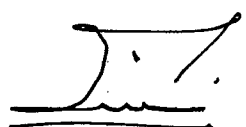
  
Reader

26.08 .2021

Mr. Noor Muhammad Khattak, Advocate, learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General for respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not made preparation for arguments. Adjourned. To come up for arguments before the D.B on 27.09.2021.

  
(MIAN MUHAMMAD)  
MEMBER (EXECUTIVE)

  
(SALAH-UD-DIN)  
MEMBER (JUDICIAL)

27.9.21

DB is on Tour case to come up  
For the same on Dated - 31-1-22

  
Reader



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Dated Peshawar, April 24<sup>th</sup>, 2013

NOTIFICATION

**NO.SO(S/F)E&SE/4-16/2013/Yahya Begum:** In pursuance of the Hon'able Khyber Pakhtunkhwa Supreme Court of Pakistan Peshawar Judgment dated 10-01-2013 in Civil Petition No.639-P of 2011, Mst. Yahya Begum DPE (BS-17) GGCHSS Chankani, Peshawar is hereby transferred and posted as DPE (BS-17) at GGCHSS District Peshawar against the vacant post in the interest of public service with immediate effect.

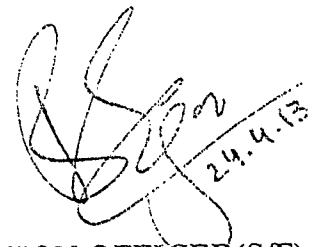
2. No TA/DA is allowed.

**SECRETARY**

Endst: of even No. & date

Copy forwarded to the:-

1. Deputy Registrar Supreme Court of Pakistan Peshawar Judgment dated 10-01-2013 in Civil Petition No.639-P of 2011.
2. Additional Registrar Peshawar High Court Peshawar Judgment dated 12-10-2011 in COC No. 211/2011 in WP No. 1341/2011.
3. Accountant General Khyber Pakhtunkhwa Peshawar.
4. Directorate, E&SE, Khyber Pakhtunkhwa Peshawar.
5. District Education Officer E&SE Peshawar.
6. District Account Officer Peshawar.
7. Incharge EMIS, E&SE Department.
8. PS to Secretary E&SE Department.
9. Officer concerned.
10. Office order file.

  
24.4.13

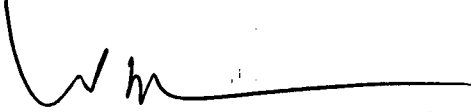
**SECTION OFFICER(S/F)**

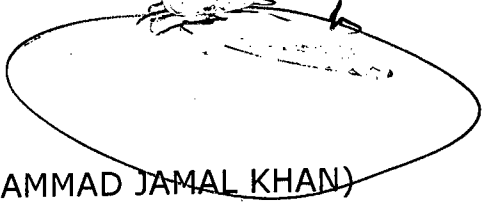


03.02.2021

Mr. Muhammad Naeem, husband of the appellant, on behalf of the appellant is present. Mr. Muhammad Rasheed, Deputy District Attorney and Mr. Muhammad Saleem, Section Officer, for the respondents are also present.

The contents of order sheet dated 20.11.2020 followed by order sheet dated 11.12.2020 reveals that notice to newly impleaded respondent i.e Mst. Samina Akhtar, has not been dispatched by the office, therefore, proceeding in the instant lis cannot be conducted unless and until the service of the aforesaid respondent is procured. Accordingly, the office is strictly directed to ensure that notice to the aforesaid respondent is issued for next date of hearing. Respondent-department is also directed to submit their reply on the next date. Appeal to come up on 24.02.2021 before D.B.


  
(ATIQ-UR-REHMAN WAZIR)  
MEMBER (EXECUTIVE)

  
(MUHAMMAD JAMAL KHAN)  
MEMBER (JUDICIAL)

24.02.2021

Counsel for the appellant and Mr. Asif Masood, DDA for the official respondents present. Nemo on behalf of private respondent No. 4.

On 03.02.2021 notice was required to be sent to the added respondent No. 4. On the record, copy of the notice as well as postal receipts are available. Despite, respondent No. 4 is unrepresented today, she is, therefore, placed ex-parte. To come up for arguments on 24.03.2021 before the D.B.

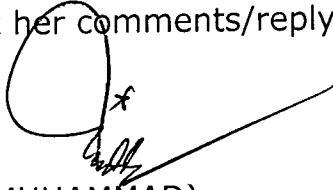
  
(Mian Muhammad)  
Member(E)


  
Chairman

11.12.2020

Mr. Mir Zaman Safi, Advocate, for appellant is present. Mr. Muhammad Jan, Deputy District Attorney, for the respondents are also present.

Notice to newly impleaded respondent in the panel of respondents has not been issued. Office is directed to issue notice to newly impleaded respondent for 14.01.2021 directing him to submit her comments/reply before D.B.

  
(MIAN MUHAMMAD)  
MEMBER (EXECUTIVE)

  
(MUHAMMAD JAMAL KHAN)  
MEMBER (JUDICIAL)

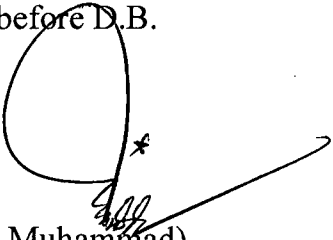
14.01.2021

Junior to counsel for the appellant present. Addl: AG

alongwith Mr. M. Saleem, SO for respondents present.

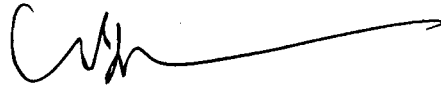
Arguments could not be heard due to learned Member(Judicial) is on leave.

Adjourned to 03.02.2021 for arguments before D.B.

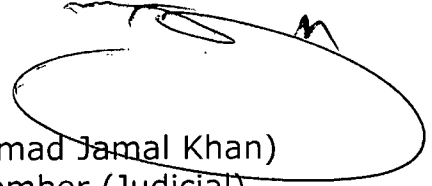
  
(Mian Muhammad)  
Member(E)

15.10.2020

Mir Zaman Safi, Advocate for appellant is present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents is also present. Appellant submitted application for impleadment of one Mst. Sameena Akhtar, SIPE (BS-18) as private respondent in the present Service Appeal. Copy of the application be handed over to learned Additional Advocate General for reply and arguments. File to come up for reply and arguments on impleadment application on 20.11.2020 before D.B.



(Atiq-ur-Rehman Wazir)  
Member (Executive)



(Muhammad Jamal Khan)  
Member (Judicial)

20.11.2020

Appellant present through counsel.

Muhammad Jan learned Deputy District Attorney for official respondents present.

An application had been submitted for impleadment of one Mst. Samina Akhter which application was not objected to by learned D.D.A and in this regard, his signature was obtained on the said application. Hence, application is allowed and Mst. Samina Akhter stands impleaded in the panel of respondents. Notice be issued to newly impleaded respondent.

Adjourned to 11.12.2020 for attendance of newly impleaded respondent and comments, before D.B



(Atiq ur Rehman Wazir)  
Member (E)



(Rozina Rehman)  
Member (J)

04.08.2020

Junior counsel for the appellant and Mr. Kabirullah Khattak, Additional AG alongwith Mr. Fazle Subhan, Section Officer on behalf of respondent No. 2 present.

Representative of respondent No. 2 submitted para-wise comments on behalf of respondent No. 2 which are placed on file. Neither written reply/comments on behalf of respondent No. 3 submitted nor any representative on his behalf is present, therefore, notice be issued to him with the direction to submit written reply/comments on the next date positively. File to come up for written reply/comments on behalf of respondent No. 3 on 28.09.2020 before S.B.

  
(MIAN MUHAMMAD )  
MEMBER (E)

28.09.2020

Junior to counsel for the appellant and Addl. AG respondents present.

Respondent No. 3 has not furnished requisite reply/comments despite repeated adjournments. The appeal is assigned to D.B for arguments on 15.10.2020. The appellant may furnish rejoinder to the joint parawise comments of respondents No. 1 & 2, within a fortnight, if so advised.

  
Chairman

12.03.2020

Counsel for the appellant and Mr. Kabirullah Khattak, Additional AG for the respondents present. Neither written reply on behalf of respondents submitted nor representative of the department is present, therefore, notices be issued to the respondents with the direction to direct the representative to attend the court and submit written reply on the next date positively. Last opportunity is given to respondents to furnish written reply/comments. Adjourned to 27.03.2020 for written reply/comments before S.B.

  
(MUHAMMAD AMIN KHAN KUNDI)  
MEMBER

27.03.2020

Due to public holidays on account of Covid-19, the case is adjourned. To come up for the same on 18.06.2020 before S.B.

  
Reader

18.06.2020

Junior to counsel for the appellant and Addl: AG alongwith Mr. Fazal Subhan, SO for respondents present. Written reply not submitted. Requested for adjournment. Adjourned but as a last chance. To come up for written reply/comments on 04.08.2020 before S.B.

  
MEMBER

1558/2019

10.12.2019

Appellant present in person.

States that the process fee and security have not been deposited within the prescribed time due to unavoidable circumstances and submitted an application for extension of time to deposit the same. (Placed on record).

Application is accepted. The appellant is allowed ~~to~~ deposit the requisite fee within three working days from today. After such deposit notices be issued to the respondents. To come up for written reply/comments on 21.01.2020 before S.B.

Appellant Deposited  
Security & Process Fee

10/12/19

Chairman

21.01.2020

Junior to counsel for the appellant and Addl. AG for the respondents present.

Learned AAG seeks time to contact the respondents and furnish the requisite reply/comments. Adjourned to 26.02.2020 on which date reply/comments shall positively be furnished.

Chairman

26.02.2020

Counsel for the appellant present. Nemo for the respondents. Fresh notices be issued to the respondents. To come up for reply/comments on 12.03.2020 before S.B.

(Hussain Shah)  
Member

26.11.2019

Counsel for the appellant present.

Contends that a departmental enquiry was initiated against the appellant and one other wherein the former was alleged to have allowed media persons inside the female student compartment without any authorization. Upon the conclusion of the enquiry proceedings, it was found that the appellant had committed misconduct, therefore, she was recommended for censure and transfer from the school. Resultantly, the impugned notification dated 26.07.2019 was issued by respondent No.2 whereby the appellant was transferred from GGHSS, Peshawar to GGHSS, Pir Pai, District Nowshera. Learned counsel referred to the Khyber Pakhtunkhwa Efficiency and Discipline Rules, 2011 and stated that nowhere the punishment of transfer of a civil servant was included in the category of minor or major punishment. In the said manner, the impugned transfer of the appellant was not made in the public interest. Learned counsel also referred to para-IX of the Posting/Transfer Policy of the Provincial Government and stated that the husband of the appellant was performing duty as Security Supervisor at Pakistan Institute of Community Ophthalmology, Hayatabad Medical Complex, Peshawar, therefore, the appellant was not to be transferred to a post in District, Nowshera.

In view of arguments of learned counsel and record appended with the memo of appeal, instant appeal is admitted to regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission written reply/comments on 10.12.2019 before S.B.



  
Chairman

Form- A

# FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No.- 1558/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	18/11/2019	<p>The appeal of Mst. Yahya Begum presented today by Mr. Noor Muhammad Khattak Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-	19/11/19.	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>26/11/19.</u></p> <p> CHAIRMAN</p>

8



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

SERVICE APPEAL No. 1558 /2019

**YAHYA BEGUM**

**VS**

**EDUCATION DEPTT:**

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<b>6.</b>	CNIC's	<b>C</b>	9- 10.
<b>7.</b>	Nikah Nama	<b>D</b>	11.
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**APPELLANT**

**THROUGH:**

**NOOR MOHAMMAD KHATTAK**  
**ADVOCATE**

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

Khyber Pakhtunkhwa  
Service Tribunal

Duty No. 1649

Date 18/11/2019

**APPEAL NO. 1558 /2019**

Mst: Yahya Begum, Senior Instructor of Physical Education (BPS-18),  
GGCHSS, Peshawar under transfer to GGHSS Pir Pai, District Nowshera.

.....**APPELLANT**

**VERSUS**

- 1- The Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
- 2- The Secretary (E&SE) Department Khyber Pakhtunkhwa, Peshawar.
- 3- The Director (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.

4. *Sameer Akhtar S.I.P.E (BPS-18) GGCHSS, Peshawar* .....**RESPONDENTS**

**APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED NOTIFICATION DATED 26.07.2019 WHEREBY THE APPELLANT WAS TRANSFERRED FROM GOVERNMENT GIRLS COMPREHENSIVE HIGHER SECONDARY SCHOOL, PESHAWAR TO GOVERNMENT HIGHER SECONDARY SCHOOL PIR PAI, DISTRICT NOWSHERA AND AGAINST NO ACTION TAKEN ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS**

**PRAYER:**

That on acceptance of this appeal the impugned order dated 26.07.2019 may very kindly be set aside and the appellant may not be transferred from Government Girls Comprehensive Higher Secondary School, Peshawar. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

**R/SHEWETH:**

**ON FACTS:**

- 1- That appellant is the employee of respondent Department and is serving as Senior Instructor of Physical Education (BPS-18) quite efficiently and up to the entire satisfaction of her superiors.
- 2- That during performing duty at Government Girls Comprehensive Higher Secondary School, Peshawar some baseless allegations were leveled against the appellant by the respondents. That the competent authority had conducted Departmental inquiry in the matter and after conclusion it was

*3 copies of  
as per P.T. order  
made at P.T. office  
dated 20-11-2019*

*Filed to day  
Sonic  
18/11/19  
Registrar*

found that the allegations which have been leveled against the appellant have not been proved. Copy of the inquiry is attached as annexure ..... **A.**

**3-** That astonishingly the respondent No.2 issued the impugned order dated 26.07.2019 whereby the appellant has been transferred from Government Girls Comprehensive Higher Secondary School, Peshawar to Government Girls Higher Secondary School, Pir Pai, District Nowshera on administrative ground. Copy of the impugned order is attached ..... **B.**

**4-** That the allegations mentioned above was also leveled against the vice Principal Mst: Rukhsana Parveen who was also inquired by the inquiry committee but only the appellant has been made escape goat by transferring her from GGCHSS Peshawar.

**5-** That it is pertinent to mention that husband of the appellant namely Mr. Muhammad Naeem is also a Civil Servant and is serving as Security Supervisor at Pakistan Institute of Community Ophthalmology, Hayat Abad Medical Complex, Peshawar and under the spouse policy the appellant is entitle to serve the respondent department at Government Girls Comprehensive Higher Secondary School, Peshawar. Copies of the CNIC's, Nikah Nama and service certificate are attached as annexure.....**C, D & E.**

**6-** That it is also pertinent to mention that the appellant is the patient of cancer and due to the said disease the appellant has not been able to perform her duty at far stations other than Peshawar. Copies of the medical prescriptions are attached as annexure.....**F.**

**7-** That appellant feeling aggrieved from the impugned Notification dated 26.7.2019 submitted Departmental appeal before the appellate authority but no reply has been received from the authority concerned. Hence the appellant having no other remedy filed the instant service appeal on the following grounds amongst the others. Copy of the Departmental appeal is attached as annexure.....**G.**

**GROUND:**

**A-** That the impugned Notification dated 26.7.2019 is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.

**B-** That the appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted

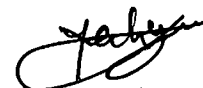
above and as such the respondents violated Article 4 and 25 of the constitution of Islamic Republic of Pakistan 1973.

- C-** That the impugned Notification dated 26.7.2019 is against the clauses-I & VII of the transfer/posting policy of the provincial Government of Khyber Pakhtunkhwa.
- D-** That the impugned Notification dated 26.07.2019 is also violative of Clause- IX of the transfer/posting policy, therefore not tenable and liable to be set aside. Copy of the transfer/posting policy is attached as annexure.....**H.**
- E-** That the respondents acted in arbitrary and malafide manner by issuing the impugned Notification dated 26.7.2019 against the appellant.
- F-** That, the appellant has been discriminated by the respondents on the subject noted above and as such the respondents violated the Principle of Natural Justice.
- G-** That neither the impugned Notification dated 26.7.2018 has been issued in the public interest nor the same has been issued in exigencies of public service.
- H-** That the appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

Dated: 28.10.2019

APPELLANT



**YAHYA BEGUM**

THROUGH:

**NOOR MOHAMMAD KHATTAK**

&

**MIR ZAMAN SAFI,**  
ADVOCATES

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

**SERVICE APPEAL No. \_\_\_\_\_/2019**

**YAHYA BEGUM**

**VS**

**EDUCATION DEPTT:**

**APPLICATION FOR SUSPENSION OF OPERATION OF  
THE IMPUGNED NOTIFICATION DATED 26.07.2019  
TILL THE DISPOSAL OF THE ABOVE MENTIONED  
APPEAL**

**R/SHEWETH:**

- 1- That the above mentioned appeal along with this application has been filed the appellant before this august service Tribunal in which no date has been fixed so far.
- 2- That appellant filed the above mentioned appeal against the impugned notification dated 26.07.2019 whereby the appellant has been transferred from GGCHSS Peshawar to GGHSS Pir Pai, District Nowshera in violation of clauses-VII & IX of the transfer/posting policy.
- 3- That all the three ingredients necessary for the stay is in favor of the appellant.
- 4- That the impugned order dated 26.07.2019 had been issued by the respondents in utter disregard of law and prevailing Rules.

It is therefore, most humbly prayed that on acceptance of this application the operation of the impugned Notification dated 26.07.2019 to the extent of appellant may very kindly be suspended till the disposal of the above mentioned service appeal.

Dated: 18.11.2019

**APPLICANT**

  
**YAHYA BEGUM**

**THROUGH:**

  
**NOOR MOHAMMAD KHATTAK**

**&**

  
**MIR ZAMAN SAFI  
ADVOCATES**

A - (5) (B)

**INQUIRY REPORT**

Subject: - **INQUIRY AGAINST MST.RUKHSANA PARVEEN VICE PRINCIPAL & MST. YAHYA BEGUM SIPE**

**BACKGROUND**

The undersigned was appointed as Inquiry Officer by Secretary Elementary & Secondary Education Khyber Pakhtunkhwa vide Section Officer (School Female) office order No. SO(S/F) & SED/4-17/2018/Corporal Punishment/Peshawar dated 05<sup>th</sup> December 2018 (Annex-A) to probe into matter and investigate the allegations mentioned in charge sheet (Annex-B & C) against the teachers / officers of Govt: Sahibzada Umer Shaheed, Girls Higher Secondary School Peshawar which are reproduced as below:

- i. *Awarded corporal punishment to 22 students on 13-11-2018, thus committing gross violation of the Government of Khyber Pakhtunkhwa Child Protection and Welfare Act 2010. (against Mst: Rukhsana Parveen, vice Principal)*
- ii. *Invited and allowed media persons inside the female students compartments without any authorization, thereby violated the policy of Government. (against Mst. Yahya Begum, SIPE)*

**BRIEF HISTORY:**

The accused teacher / officers of Govt: Sahibzada Umer Shaheed, Girls Higher Secondary School Peshawar namely Mst: Rukhsana Parveen vice Principal violated Rules of the Government of Khyber Pakhtunkhwa Child Protection and Welfare Act 2010. (Annex-D) and committed the irregularities of corporal punishment to 22 students on 13-11-2018, Mst: Yahya Begum SIPE invited and allowed media persons inside the female students compound without any authorization and by this means she violated policy of the Government.

**PROCEEDINGS:**

ATTESTED  
The undersigned served Charge sheets and statement of allegation through Director Elementary & Secondary Education Khyber Pakhtunkhwa vide this office letter vide (Annex-E) on the accused officers (Mst: Yahya Begum & Mst: Rukhsana Parveen) as well as directly handed over to them when they appeared before the undersigned on 14.12.2018 and 17.12.2018 respectively along with

(6) (7)

if any to the charge sheet and statement of allegation within seven working days. They submitted their written reply / defense (**Annex-F&G**). Later on Mst. Dilshad Begum Deputy Director (Establishment) representative of Directorate of E&SE was also joined inquiry proceedings on 21-12-2018 on behalf of department. The undersigned and representative examined both written replies / defense of the accused. The undersigned authorized the representative to visit the said school and record the statements of teachers, ministerial staffs as well as the effective students.

As per instruction representative visited the school on 07-01-2019 to find out the actual position. She gave a questionnaire containing 12 essential questions to Mst: Rukhsana Parveen Vice Principal wherein she admitted that she slapped the students due to their absentee from school for more than two to three weeks and not for her personal interest. The little slap was just advisory gesture like mother to her children and it was not to the extent of corporal punishment. The Deputy Director (Establishment) also obtained joint statement from school teachers namely; Mst: Najma Khalique SSS (BPS-18), Mst: Mubeen SSS (BPS-18) and Mst: Amat Ara SSS Pak-Study (BPS-18) of the concerned school who were the eye witnesses of that incident wherein they stated that due to non-serious attitude of the students Mst: Rukhsana Parveen Vice Principal got annoyed resulted the little slap to the students (**Annex-H**). The Deputy Director (Establishment) stated that the students apologized the principal for their fault in her presence and promised that they would be punctual in future and such like incident would not be repeated.

Mst: Yahya Begum SIPE also submitted her statement wherein she denied the allegation and stated that she had never called any media or illaqa Nazim to school in connection with that incident which took place on 13-11-2018.

After visit to the concerned school Deputy Director (Establishment) submitted her report to the undersigned (**Annex-I**).

For further analysis undersigned also called the father of the effected students as well as Muhammad Ishaq Assistant and Mr. Misal Khan Clerk of the concerned school the father of the concerned students did not come while some seven persons from ministerial staff including school chowkidar (watchman) attended this office on 25-01-2019 and recorded their joint statement (**Annex-J**). In their statement they denied such like incident of corporal punishment, rather than they praised the labor and good efforts on the part of vice principal for the welfare and betterment of school as well as for students. According to them she is punctual and abides by discipline.

FINDINGS:-

(7)

I gone through the available record which reveals that the allegation against Mst. Rukhsana Parveen Principal has not been proved to the extent of corporal punishment and the Deputy Director (Establishment) has suggested warning to her. So far as the allegation against Mst. Yahya Begum SIPE is concerned which has also not been proved. The Nazim might have come with the fathers of the students who were invited by the vice Principal. The vice principal invited the fathers in good faith, for the good governance of the school, to aware the father about the non-serious attitude of their daughters and she attempted to make the future of the students bright but the intriguers exploited and exaggerated the situation and tried to defame the vice principal Mst. Yahya Begum SIPE has committed misconduct by narrating story to irrelevant person and exposing the internal situation of school to persons who were not authorized in this regard. The Deputy Director (Establishment) has suggested censure to her and her transfer from that school. In her (Yahya Begum) statement that she found the students unconscious depicts her personal grudges with the vice principal

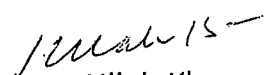
In my opinion to run a school especially of female students, Administration like to control the huge strength of students, to ensure their attendance, to show good results in the examination is the gigantic task and a lady / vice principal in absence of principal was trying at her level best to do so.

Recommendation:

According to Establishment & Administration Department (Regulation Wing) letter bearing No. SOR-V(E&AD)/Instruction/2014 dated 28<sup>th</sup> March 2014, the inquiry officer / inquiry committee is not required to recommend exoneration or any other recommendation of punishment unless otherwise specifically asked for.

ATTESTED



  
Ikram Ullah Khan  
Member-1, Board of Revenue  
Revenue & Estate Department  
Khyber Pakhtunkhwa





B-8

**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 July 26<sup>th</sup>, 2019

**NOTIFICATION**

**No. SO(S/F)E&SED/4-16/2019/Re-adjustments:** Consequent upon the approval of Competent Authority; the following Senior Instructor Physical Education (BS-18) are hereby adjusted against the mentioned posts in public interest with immediate effect:

S#	Name & Designation	Adjusted As	Remarks
1.	Mst. Sameena Akhtar, SIPE (BS-18) GGCHSS Pir Pai Nowshera	SIPE (BS-18) GGCHSS Peshawar	Vice Sr. No. 2
2.	Mst. Yahya Begum, SIPE (BS-18) GGCHSS Peshawar	SIPE (BS-18) GGCHSS Pir Pai Nowshera	Vice Sr. No. 1

No TA/ DA 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) Peshawar & Nowshera.
4. District Accounts Officers Peshawar & Nowshera.
5. In charge EMIS, E&SE Department for uploading at official website.
6. PS to Secretary E&SE Department.
7. SIPEs concerned.
8. Office order file.

(GULRUKH)

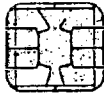
SECTION OFFICER (SCHOOLS FEMALE)

C-9



PAKISTAN National Identity Card  
ISLAMIC REPUBLIC OF PAKISTAN

Name  
Muhammad Naeem



Father Name  
Khan Wali



Gender | Country of Stay  
M | Pakistan

Identity Number  
42501-1495503-9

Date of Birth  
10.02.1972

Date of Issue  
27.12.2016

Date of Expiry  
27.12.2026

Holder's Signature

4

Attested  
g

42501-1495503-9

سیدنا حسین خلیل، ذات تازہ نیو کارہ، نیو کارہ، تحصیل تحت  
مہرن، ضلع کوٹ



101801129219

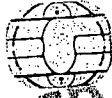
Usman H. Memon  
Registrar General of Pakistan

گشده کارڈ ملنے پر قریبی لیو بکس میں ڈال دیں



PAKISTAN National Identity Card

ISLAMIC REPUBLIC OF PAKISTAN  
Name  
Yahya Begum



Husband Name:  
Muhammad Naeem

Gender: F Country of Stay: Pakistan

Identity Number:  
14203-1986861-6

Date of Birth:  
08.06.1973

Date of Issue:  
11.06.2019

Date of Expiry:  
11.06.2029

Holder's Signature

ATTESTED

Attested

14203-1986861-6



سید محمد امین عثمان، ڈاک خان، چوکا، چوکا رو، تحصیل تحت  
ضلع، ضلع کوٹ

505521220774

Muhammad M. Memon  
Registrar General of Pakistan

گمشدہ کارڈ ملنے پر قریبی لیو بکس میں ڈال دیں



17: خاص شرائط اگر کوئی ہوں کوئی نسیر

نسیر دیا ہے

18: آیا شوہر نے طلاق کا حق بیوی کو تفویض کر دیا ہے اگر کر دیا ہے تو کون سی شرائط کے تحت

نسیر لگائی گئی ہے

19: آیا شوہر کے طلاق کے حق پر کسی قسم کی پابندی لگائی گئی ہے

نسیر تیار کی گئی ہے

20: آیا شادی کے موقع پر مہر و نان و نفقہ وغیرہ سے متعلق کوئی دستاویز تیار کی گئی ہے اگر کی گئی ہے تو اس کے مختصر مندرجات

نسیر ہے

21: آیا دولہا کے یہاں پہلے سے کوئی بیوی موجود ہے اگر ہے تو آیا اس نے دوسری شادی کرنے کیلئے مسلم خاندانی قوانین کے آرڈیننس 1971ء کے تحت ثالثی کونسل سے اجازت نامہ حاصل کر لیا ہے۔

X

22: نمبر تاریخ مراسلہ جس کے ذریعے ثالثی کونسل نے دولہا کو دوسری شادی کرنے کی اجازت دی ہے۔

قاری خالد عباس خان ولد خان خان  
ماحول آمین محل محل تحت نصیری ضلع کرنی  
چوکاٹ

23: نکاح خواں کا نام اور ولدیت مع پتہ

30-7-2001

24: شادی درج رجسٹر کرانے کی تاریخ

25: فیس رجسٹریشن جوادا کی گئی

دولہا کے وکیل کے تقرر کے گواہان کے دستخط  
1

2 خالد امیر ولد زوی

دہن کے وکیل کے تقرر کے گواہان کے دستخط  
1

1

2 اورداد زب و لوفان بون

نکاح خواں کے دستخط

A. H. S. S.

نکاح خواں کے دستخط مع مہر

31/7/2001

دولہا یا اس کے وکیل کے دستخط  
31-5-2001

دہن کے دستخط  
Jahya Kwattah

دہن کے وکیل کے دستخط  
مسلم سوز خان

شادی کے گواہان کے دستخط  
محمد علی

محمد علی  
نور محمد  
145-85-2003



E-12

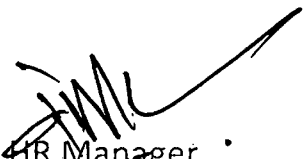
**Pakistan Institute Of Community Ophthalmology**  
Hayatabad Medical Complex, Peshawar, Pakistan

Ref: 311/HR/PICO/2018

Date: 12/09/2018

**TO WHOM IT MAY CONCERN**

It is certified that Mr. Muhammad Naeem S/O Khan Wali working as a Security Supervisor at Pakistan Institute of Community Ophthalmology Hayatabad Medical Complex, Peshawar since August 10<sup>th</sup>, 2017 till date.

  
HR Manager,  
PICO, HMC.

ATTESTED



# Dr. Safoora Shahid

M.B.B.S, M.C.P.S Oncology (pak)  
Consultant Oncologist & Gynecologist  
Specialist in Breast Diseases  
Fellowship Radiotherapy (London)  
Memography (Paris)  
Member Estro.



*Handwritten signature*

F-13  
ڈاکٹر صفورہ شاہد

ایم بی بی ایس (پاک) ایم سی پی ایس (پاک)

ناہر امراض نسواں و سرطان  
سپیشلسٹ ان بریسٹ ڈیزیز

فیوشپ ریڈیو تھراپی (لندن) میوگرافی (پیرس)

کلینک: تیسری منزل رجیم میڈیکل سنٹر جی ٹی روڈ پشاور

تعطیل بروز ہفتہ اتوار

Not Valid For Court

Name

*Yahya Beg*

Date

*11-11-19*

History  
Clinical Record

*Rachid Habibi*

*Known as  
Ca @ S  
MR - Need*

*Calcare - D  
as -*

*Calicoid ap (oh)*

*Chalchur*

*Handwritten notes in Urdu/Arabic script*

*ref to*

*Nise tub*

*Org*

*Handwritten notes in Urdu/Arabic script*

*f Chalchur*

*Handwritten notes in Urdu/Arabic script*

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ATTESTED

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\* Esce us

→ Rt St us -

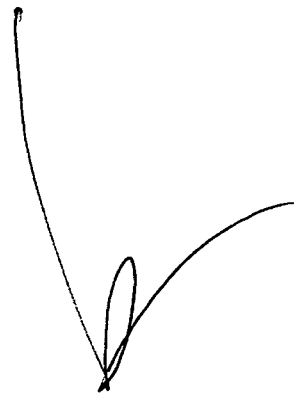
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Am us - Chalchis

First Store (1.7m) <sup>marked</sup>

in gull block

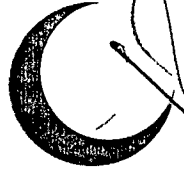
→ Chalchis





# Dr. Safoora Shahid

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Consultant Oncologist & Gynecologist  
Specialist in Breast Diseases  
Fellowship Radiotherapy (London)  
Memography (Paris)  
Member Estro.



ڈاکٹر صفورا شاہد  
14

ایم بی بی ایس (پاک) ایم سی پی ایس (پاک)  
ماہر امراض نسوان و سرطان  
سپیشلسٹ ان بریسٹ ڈیزیز  
فیلوشپ ریڈیو تھراپی (لندن) میموگرافی (پیرس)  
کلینک: تیسری منزل رحیم میڈیکل سنٹر جی ٹی روڈ پشاور

تعطیل بروز ہفتہ اتوار

Not Valid For Court

Name Yubayy Bg Date 2/7/10

History  
Clinical Record

Rx

Ca BR  
Barbal

New follow up

Has hb  
low wbc.  
of 5 yrs  
1/6w stop

Co 087292075  
Hab  
Hab  
① ED-3 tabs ②  
Hab  
⑤ Sumba 2  
Hab  
② Bsnfer plus  
② 200 1 10

ATTESTED

4

Professor

**Dr. Naeema Utman**

Gynaecologist

Incharge Gynae "B" Unit

Hayatabad Medical Complex Peshawar

Clinic: Ring Road, Achini Chowk, Near Shell Petrol Pump

Sugar Plum Bakery Peshawar.

Cell: 0331-9078168 / 0315-9847796 / Ph:091-5811646

15

پروفیسر  
ڈاکٹر نعیمہ اُتمان

گائنا کالوجسٹ

انچارج گائنی "بی" یونٹ حیات آباد میڈیکل کمپلیکس پشاور  
کلینک: ریگ روڈ، اچینی چوک، نزد شل پٹرول پمپ، شوگر پلم بیکری پشاور

P. Name Yahya w/o M. Naeem Age                      Date 9/7/18

Clinical Record

Rx

Meniscal - 16 yrs

+1  
BB  $\left\{ \begin{array}{l} 10 \\ 10 \end{array} \right\} > c/sa$

BB - 12 yrs

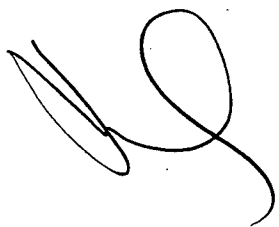
mp 218 / June / 18

gde - Irregular

28i - 2 1/2

ad

Dec.



ATTESTED



27/18

ہفتہ، اتوار چھٹی

# Dr. Safoora Shahid

M.B.B.S, M.C.P.S Oncology (pak)  
Consultant Oncologist & Gynecologist  
Specialist in Breast Diseases  
Fellowship Radiotherapy (London)  
Memography (Paris)  
Member Estro.

Free  
ڈاکٹر صفورا شاہد (16)

ایم بی بی ایس (پاک) ایم سی پی ایس (پاک)  
ماہر امراض نسوان و سرطان  
سپیشلسٹ ان بریسٹ ڈیزیز  
فیوشپ ریڈیو تھراپی (لندن) میموگرافی (پیرس)  
کلینک: تیسری منزل رحیم میڈیکل سنٹر جی ٹی روڈ پشاور

تعطیل بروز ہفتہ اتوار

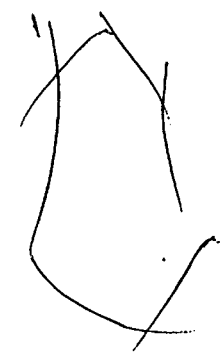
Not Valid For Court

Name Yahya Begum

Date 8/7/19

### History Clinical Record

ca - breast  
the at of  
has stopped (2011)  
c/o not a dx  
2 yr ago  
P/v bleeding



ATTESTED

Handwritten signature/initials

Pro qo Dr Habis

o Haurise tb  
063

post menopausal  
bleedy P10  
up to gynaeologist  
f Diag etc

Handwritten signature/initials

W

admission

Bully camp e thick

1/25

cut-d-rar

No free fund per a

Both services man of

thick admission

There Mr bulley e

chemistry blades full

Police etc  
James Q

**NUCLEAR MEDICAL CENTRE**  
**ARMED FORCES INSTITUTE OF PATHOLOGY, RAWALPINDI**  
**PAKISTAN**

(17)

Patient ID 37411	Registration ID 37424
Yearly No. 1506/16	Payment No.16398386 Date: 10-Oct-16
No. NIL	Rank CNE FFH Name: YAHYA BEGUM
Unit. NIL	Age: 43 YRS Hospital OPD

**BONE SCAN**


**Indication:** 43 yrs old lady a diagnosed case of Lt Ca-breast came for follow-up scan.

**Procedure:** The whole body bone scan was done on 4-10-2016 with 20.0 mCi of Tc-99m MDP administered intravenously. Static images acquired in anterior and posterior projections at 3.0 hrs post injection.

**Description:** The anterior and posterior whole body bone images show bilaterally symmetrical and normal radiotracer uptake except for mild increased tracer uptake in dorsum of Rt foot. No osseous abnormality is seen.

**Opinion:** Negative for skeletal metastasis.



Report By:  Col  
**FIDA HUSSAIN**  
 MBBS, M.Sc. & FCPS (Nucl Med)  
 Classified Specialist Nuclear Medicine  
 AFIP Rawalpindi

**Major General**  
**Commandant**  
 (Parvez Ahmed)

**NUCLEAR MEDICAL CENTRE**  
**ARMED FORCES INSTITUTE OF PATHOLOGY, RAWALPINDI**  
**PAKISTAN**

(18)

<b>Patient ID</b> 24514	<b>Registration ID</b> 24533
<b>Yearly No.</b> 806/14	<b>Payment No.</b> NIL
<b>No.</b> PAK 482616	<b>Date:</b> 04/03/14
<b>Unit.</b> PAF	<b>Rank</b> W/OFFR
	<b>Name:</b> W/O MUHAMMAD NAEEM
	<b>Age:</b> 40 YRS
	<b>Hospital</b> OPD

**BONE SCAN**

**Indication:** Ca-Breast (Lt) - for skeletal evaluation.

**Procedure:** The whole body bone scan was done on 01-04-2014 with 20.0 mCi of Tc-99m MDP administered intravenously. Static images were acquired in anterior and posterior projections at 2.0 hrs post-injection.

**Description:** Anterior and posterior spot views of the skeleton demonstrate overall normal and bilaterally symmetrical radiotracer uptake and distribution, in the axial and appendicular skeleton. No significant osseous abnormality is noted.

**Opinion:** Negative for skeletal metastasis.

NOTE: No significant change is noted, on comparison with the previous whole body bone scan dated 2-7-2012.

**ATTESTED**

A

*Mehdi Raza*

Report By: Lt Col Mehdi Raza

**Lt Col AMC**  
**MEHDI RAZA T.Bt**  
 Classified Nuclear Med Spec  
 NMC, AFIP Rawalpindi

**Major General**  
**Commandant**  
 (Muhammad Ayyub)



19

# DEPARTMENT OF ONCOLOGY

## COMBINED MILITARY HOSPITAL RAWALPINDI.

W/O

Indoor/Outdoor OPD Official No. \_\_\_\_\_ Serial No. \_\_\_\_\_  
 No. 482616 Rank A.W.O Name Naeem Age 39 y.  
 Unit PAF Permanent Address \_\_\_\_\_ Phone \_\_\_\_\_

### RADIATION THERAPY PRESCRIPTION

Date	Field	Tech	Energy	Calc point	Bolus/wedge	Dose/day	Fx/wk	Total Dose	Previous Dose	Sign
6 <sup>2</sup> / <sub>20</sub> 12	LMT	SAD	6MV	9cm	30°/1cm	150	5	1950		
"	LLT	SAD	6MV	9cm	30°/1cm	150	5	1950		Q
"	AP Supraclav.	SSD	6MV		—	300	5	3900		

Diagnosis △ CA Breast (Lx)(Lt)

Histopath

Stage T2 N1

ECOG PS

Surgery MRM

Chemo AC 4 / Pacl 4

CT/MRI/USG findings

**ATTESTED**

Intent of Treatment

Curative/Palliative

Dose Planned 39 Gy

Fractions 13 fx

Re-Planning Dose 750 cGy

Fractions 3 fx

Followup

GPE

Field Number		LMT	LLT	LSCF
DESCRIPTION		LMT	LLT	LSCF
PHOTON/ELECTRON		6	6	6
F.SIZE/ELECTRON CONE		170x124	170x124	100x115
COLLM. ANGLE				09
GANTRY ANGLE		305	125	245
TRT. TABLE ANGLE				
BLOCKS				/
WEDGE		30	30	
BOLUS				
HEAD REST				
SSD/SAD		91	91	100
COMPUTER PLAN				
DAILY T D CGY		150	150	200
TREATMENT				

LOCAL EXAM

SYSTEMIC EXAM

U/S. C.T. SCAN, X RAY

HISTOPATHOLOGY

LABORATORY INVESTIGATIONS

Date	No	Elaps Days	M.U.	Cum Dose	M.U.	Cum Dose	M.U.	Cum Dose	M.U.	Cum Dose	M.U.	Cum Dose
06.02.12	1		365	750	365	150	347	300				
07.02.12	2			300		300		600				
08.02.12	3			450		450		900				
09.02.12	4			600		600		1200				
10.02.12	5			750		750		1500				
13.02.12	6			900		900		1800				
14.02.12	7			1050		1050		2100				
15.02.12	8			1200		1200		2400				
16.02.12	9			1350		1350		2700				
17.02.12	10			1500		1500		3000				
20.02.12	11			1650		1650		3300				
21.02.12	12			1800		1800		3600				
22.02.12	13			1950		1950		3900				
23.02.12	14										2500	
24.02.12	15										500	
27.02.12	16										750	

Date

Date Follow Up



**SPECIALIST'S REPORT**  
**CMH RAWALPINDI**

In lieu of  
PAFM-1276

28 NOV 2012

Reported by spec in\* w/o Date \_\_\_\_\_

No. 482616 Rank Awo Name Naseem

Age 39y Unit PA7

Diagnosis \_\_\_\_\_

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**1. Complaints**

patient keirmed.

- ct x 04 w/e.

**2. Hist of Onset**

26 DEC 2012

Mohammad Nadeem  
Lt Col  
Classified Medical Specialist  
CMH Rawalpindi

- ct x 01 months m m  
31-10-12.

ECG:

**ATTESTED**

**3. Clinical Exam**

06/05/2013

CA - Poor

Mohammad Nadeem  
Lt Col  
Classified Medical Specialist  
CMH Rawalpindi

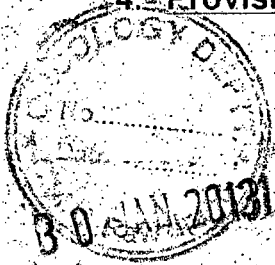
Geni Estrodiol level

CT = one m

Dr. Iftikhar Hussain  
MBBS, FCPS (Med), FCPS (ONCO) FRCR (UK) FRCR (USA)  
Classified Medical Specialist & Oncologist  
CMH Rawalpindi

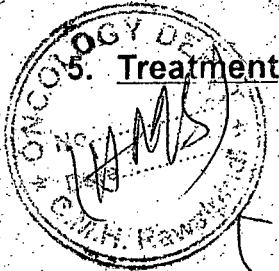
(8)  
(20)

4. Provisional Diagnosis Investigations:



HMS

CT x DT mouth



5. Treatment

Maj. Mansoor

Lt Col MOHAMMAD NADEEM  
Classified Medical Oncologist  
Asst. Prof. M.D.  
Military Medical College

27 FEB 2013

CT x DT mouth

6. Disposal

22/05/2013

↑ Estimated  
2627

me /

Maj (AMC)  
Mansoor Zeeshan  
Classified Medical Specialist  
Registrar in Medical Oncology

Tab Nalvoche 10P  
17071

13 Uremia 11.75 828

Aug 03/13

me Brig. DR. FETIKHAR HUSSAIN  
MBBS (Specialized), FCPS (ONC), FPMG, DVC, DSA  
Classified Medical Specialist & Oncologist  
CMH Rawalpindi

Polymyxin 2 to 08

3/7/13

me - 77 Nalvoche 10P

- 54 Polymyxin 2 to 08  
Lecasa 3-75  
me a a a a a

Dr. Manzoor Zakaria  
M.B.B.S. (U.S.A.)  
Medical Specialist & Oncologist  
CMH Rawalpindi

**NUCLEAR MEDICAL CENTRE**  
**ARMED FORCES INSTITUTE OF PATHOLOGY, RAWALPINDI**  
**PAKISTAN**

21

Patient ID 15563  
 Yearly No. 1733/12  
 No. NIL  
 Unit. NIL

Payment No.-  
 Rank AWO  
 Age: 39 YRS

Registration ID 15585  
 Date: 04/07/2012  
 Name: W/O NAEEM  
 Hospital OPD

**BONE SCAN**

**Indication:** Ca Breast - Lt.

**Procedure:** The whole body bone scan was done on 02-7-2012 with 20.0 mCi of Tc-99m MDP administered intravenously. Static images acquired in anterior and posterior projections at 2.0 hrs post injection.

**Description:** The anterior and posterior whole body bone images show homogenous and bilaterally symmetrical radiotracer distribution. No focal defect is noted.

**Opinion:** Negative for skeletal metastasis. ✓

**ATTESTED**





Report By: Col Tariq Mahmood Mirza  
**TARIQ MAHMOOD MIRZA**  
 Classified Specialist  
 Nuclear Medical Centre  
 A.F.I.P Rawalpindi

Maj Gen  
 Commandant  
 (Farooq Ahmad Khan)

**NUCLEAR MEDICAL CENTRE**  
**ARMED FORCES INSTITUTE OF PATHOLOGY, RAWALPINDI**  
**PAKISTAN**

22

<b>Patient ID</b> 11438	<b>Registration ID</b> 11461
<b>Yearly No.</b> 2591/11	<b>Payment No.</b>
<b>No.</b> 482616	<b>Date:</b> 22/09/2011
<b>Unit.</b> AHQ PSC	<b>Rank</b> AWO
	<b>Name:</b> W/O NAEEM
	<b>Age:</b> 39 YRS
	<b>Hospital</b> OPD

**BONE SCAN**

**Indication:** Ca. Breast.

**Procedure:** The whole body bone scan was done on 20-9-2011 with 16.0 mCi of Tc-99m MDP administered intravenously. Static images acquired in anterior and posterior projections at 2.0 hrs post injection.

**Description:** The anterior and posterior whole body bone images demonstrate patchy radiotracer uptake in both shoulder joints. Rest of the skeleton shows normal and bilaterally symmetrical tracer distribution.


**Opinion:**

1. Negative for skeletal metastasis.
2. Degenerative / Osteoarthritic changes - shoulder joints.

**ATTESTED**

4

Report By: Col Tariq Mahmood Mirza

  
**Colonel**  
**TARIQ MAHMOOD MIRZA**  
**Classified Specialist**  
**Nuclear Medical Centre**  
**A.F.I.P Rawalpindi**

Rpt. No. 46918

**Maj Gen**  
**Commandant**  
**(Farooq Ahmad Khan)**

# DEPARTMENT OF PATHOLOGY



Tel: (201) 36120  
(201) 36165  
(201) 36124  
(201) 36186

23

## COMBINED MILITARY HOSPITAL, PESHAWAR

PAK 482616 W/O AWO Naeem

30Y

HISTOPATHOLOGY

Sex Female Date of Result 25/07/2011

Paid No PAF

Histo No 1708/11

### GROSS EXAMINATION

Specimen : Right breast.

Total mastectomy including skin, nipple, breast tissue, axillary tissue and fat.

Measurement of specimen: 19x13x3.5cm.

Tumor location and size: Tumor is located in lower outer quadrant extending to the central region 1.5cm beneath the skin. It is firm in consistency and gray white in color having brownish streaks in surrounding tissue. Tumor measures 3x2cm.

Lymph nodes : 07 lymph nodes recovered. Largest lymph node measuring 1.5x1.5cm.

### Diagnosis:

**Tumor type** : **Invasive Ductal Carcinoma.**  
**Histological grade** : High grade. ✓  
**Tumor necrosis** : Comedo necrosis present.  
**Tumor calcification** : Not seen.  
**Vascular invasion** : Not seen.  
**Perineurial invasion** : Not seen.  
**Nipple** : Not involved by tumor.  
**Skin** : Not involved by tumor.  
**Surgical skin margins** : Free from tumor.  
**Axillary tail** : Not involved.  
**Quadrants** : Upper outer, upper inner and lower inner quadrants along with deeper margins are involved.  
**Lymph nodes** : 2/7 lymph nodes are involved by the tumor.

**ATTESTED**

~~RECEIVED~~

*[Handwritten signature]*

*[Handwritten signature]*  
25-7-11

Authorized By: Brig Iqbal Muhammad Khan

This is a computer generated report and may not require signature.

**BRIG RIZWAN HASHIM**  
MBBS, MCPS, M. Phil, FCPS  
Classified Pathologist

**Brig Iqbal M. Khan**  
MBBS, MCPS, FCPS  
Classified Pathologist

**Lt Col**  
NASIR-UD-DIN  
Classified Pathologist

**Maj Umar Khurshid**  
MBBS, FCPS  
Pathologist

1599

# DEPARTMENT OF PATHOLOGY



Tel: (201) 36120  
 (201) 36165  
 (201) 36124  
 (201) 36186

(24)

## COMBINED MILITARY HOSPITAL, PESHAWAR

W/O AWO Naeem

49Y

HISTOPATHOLOGY

Sex Female Date of Result 08/07/2011

Paid No PAF

Histo No 1599/11

### GROSS EXAMINATION

SRCO single nodular fragment of fatty tissue measuring 2.5x2x1cm. On cutting cut surface is firm, grayish white with fatty areas. RST 2.

**Site of biopsy: Breast lump**

### MICROSCOPIC DESCRIPTION

Section revealed fragment of fibro fatty tissue having a tumor forming ducts lined by atypical cells. The cells exhibit mild to moderate nuclear atypia and hyperchromasia. Stroma is fibrotic. A small focus shows neoplastic cells in the form of sheets and nests infiltrating the surrounding tissue. The tumor shows predominantly intra ductal component having a cribriform pattern. Areas of necrosis in comedo pattern are also seen.

### OPINION

Invasive Ductal Carcinoma.

APR 15 2011

Authorized By: Brig Iqbal Muhammad Khan

This is a computer generated report and may not require signature.

**BRIG RIZWAN HASHIM**  
 MBBS, MCPS, M. Phil, FCPS  
 Classified Pathologist

**Brig Iqbal M. Khan**  
 MBBS, MCPS, FCPS  
 Classified Pathologist

**Lt Col**  
 NASIR-UD-DIN  
 Classified Pathologist

**Maj Umar Khurshid**  
 MBBS, FCPS  
 Pathologist

To,

G-25

The Worthy Chief Secretary,  
Khyber Pakhtunkhwa, Peshawar

Subject: **DEPARTMENTAL APPEAL AGAINST THE IMPUGNED  
TRANSFER NOTIFICATION DATED 26.07.2019 WHEREBY  
THE APPELLANT WAS TRANSFERRED FROM GOVT:  
SAHIBZADA UMER SHAHEED GIRLS HIGHER  
SECONDARY SCHOOL, PESHAWAR TO GHSS ON  
ADMINISTRATIVE GROUND**

Respected Sir,

With due respect it is stated that I am the employee of E&SE Department and serving as Senior Instructor of Physical Education at GGHS Nowshera quite efficiently and upto the entire satisfaction of my superiors. That I was performing my duty as SIPE at Govt: Sahibzada Umer Shaheed Girls Higher Secondary School, Peshawar whereas some baseless allegations were leveled against me and Vice Principal Mst. Rukhsana Parveen.

Respected Sir,

The competent authority conducted Departmental inquiry in the matter against me and the above mentioned vice principal i.e. Mst. Rukhsana Parveen. That in the above mentioned Departmental inquiry the allegations leveled against me was not proved. That astonishingly vide impugned Notification dated 26.07.2019 whereby I was transferred from Govt: Sahibzada Umer Shaheed Girls Higher Secondary School, Peshawar to Nowshera on administrative ground while no action taken against the other teacher i.e. vice Principal (Mst. Rukhsana Parveen). That appellant is affected by the serious disease of cancer and the said illness I am not able to perform my duty at far flung area. It is pertinent to mention that my husband is also a Government employee and serving as Security Supervisor at Hayat Abad Medical Complex, Peshawar. That the aforementioned transfer order is violative of Clause-VII & IX of the transfer/posting policy of the Government of Khyber Pakhtunkhwa, therefore the transfer order dated 26.07.2019 is not tenable in the eye of law. Dear Sir, I am feeling aggrieved from the impugned order dated 26.07.2019 preferred this Departmental appeal before your good self.

It is therefore, most humbly prayed that on acceptance of this Departmental appeal the impugned order dated 26.07.2019 may very kindly be set aside and I may not be transferred from the Govt: Sahibzada Umer Shaheed Girls Higher Secondary School, Peshawar.

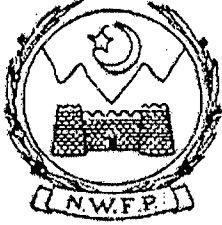
Dated: 02.08.2019

*Attested*  
*[Signature]*

*[Signature]*  
Your's Sincerely

Yahya Begum, SIPE (BPS-18)  
GGCHSS, Peshawar

H-26



**GOVERNMENT OF NWFP  
ESTABLISHMENT & ADMINISTRATION  
DEPARTMENT  
(Regulation Wing)**

*(Handwritten mark)*

**POSTING / TRANSFER POLICY OF THE PROVINCIAL GOVERNMENT.**

- i) All the posting/transfers shall be strictly in public interest and shall not be abused/misused to victimize the Government servants
- ii) All Government servants are prohibited to exert political, Administrative or any other pressures upon the posting/transfer authorities for seeking posing/transfers of their choice and against the public interest.
- iii) All contract Government employees appointed against specific posts, can not be posted against any other post.
- iv) The normal tenure of posting shall be three years subject to the condition that for the officers/officials posted in unattractive areas the tenure shall be two years and for the hard areas the tenure shall be one year. The unattractive and hard areas will be notified by the Government.
- v) <sup>1</sup>{ }
- vi) While making postings/transfer from settled areas to FATA and vice-versa, specific approval of Governor, NWFP needs to be obtained  
  
<sup>2</sup>While making postings/transfers of officers/officials up to BS-17, from settled areas to FATA and vice-versa approval of the Chief Secretary NWFP needs to be obtained. Whereas, in case of posting/transfer of officers in BS-18 and above, from settled areas to FATA and vice versa, specific approval of the Governor NWFP shall be obtained.
- vi (a) All Officers/officials selected against Zone-I/FATA quota in the Provincial Services should compulsorily serve in FATA for atleast eighteen months in each grade. This should start from senior most scales/grades downwards in each scale/grade of each cadre.
- vii) Officers may be posted on executive/administrative posts in the Districts of their domicile except District Coordination Officers (D.C.Os) and DPOs/Superintendent of Police (SP). Similarly Deputy Superintendent of Police (DSP) shall not be posted at a place where the Police Station (Thaana) of his area/residence is situated.
- viii) No posting/transfers of the officer's/officials on detailment basis shall be made.
- ix) Regarding the posting of husband/wife, both in Provincial services, efforts where possible would be made to post such persons at one station subject to the public interest.
- 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.

1  
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.  
2  
Added vide Urdu circular letter No. SOR-VI(E&AD)1-4/2003, dated 21-09-2004



- xi) Officers/officials except DCOs and DPOs/SPs who are due to retire within one year may be posted on their option on posts in the Districts of their domicile and be allowed to serve there till the retirement  
<sup>1</sup>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. <b>DMG, PSP</b> 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.

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

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 BS-19 except Heads of Attached Departments irrespective of grades will be notified by the concerned Administrative Departments with prior approval of the Competent Authority obtained on the Summary. The Notifications/orders should be issued as per specimen given below for guidance.

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

**VAKALATNAMA**

Before the KP Service Tribunal Peshawar

OF 2019

Yahya Begum

(APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

**VERSUS**

Education Department

(RESPONDENT)  
(DEFENDANT)

I/We Yahya Begum

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

Dated. 18 / 11 / 2019

Yahya Begum

CLIENT

ACCEPTED

NOOR MOHAMMAD KHATTAK

SHAHZULLAH YOUSAFZAI

KAMRAN KHAN

&

MIR ZAMAN SAFI  
ADVOCATES

OFFICE:

Flat No.3, Upper Floor,  
Islamia Club Building, Khyber Bazar,  
Peshawar City.

Mobile No.0345-9383141

Before the KP Service Tribunal, Peshawar

Appeal No. 1558/2019

Abst: Yahya Begum vs Police Deptt.

Applications for extension of  
time for submission of security  
and process fee in the above  
mentioned service appeal

Respectfully Sheweth:

- 1- That the above mentioned service appeal is pending adjudication before this august Tribunal which is fixed for hearing today on 10/12/2019.
- 2- That the above mentioned appeal was admitted for regular hearing on 26/11/2019, but due to some un-avoidable circumstances security and process could not be submitted by the appellant.

It is therefore most humbly prayed that on acceptance of this application the period/time for submitting security and process fee may very kindly be extended.

Dated: 10/12/2019.

Yahya  
Appellant  
Through:  
Mir Zaman Gafi  
Advocate

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

**Service Appeal No. 1558/2019**

Mst. Yahya Begum, Senior Instructor of Physical Education (BS-18), GGCHSS, Peshawar.....Appellant

**VERSUS**

Secretary E&SE, Govt: of Khyber Pakhtunkhwa & others..... **Respondents.**

**JOINT PARAWISE COMMENTS FOR & ON BEHALF OF THE RESPONDENTS NO 01-02.**

**Respectfully Sheweth,**

**The Respondents submit as under:-**

**Preliminary Objections**

- I. That the appellant is not aggrieved person within the meaning of Article 199 of the Constitution of Islamic Republic of Pakistan 1973
- II. That appellant is estopped by his own conduct, to approach this Hon'ble Tribunal.
- III. That no vested right of the appellant has been infringed nor any provisions of the Constitution have been violated, therefore, the instant service appeal is not maintainable in the circumstances.
- IV. That the instant appeal is based on malafide intentions just to put pressure on the Respondents for the grant of illegal and even unauthorized service benefits.
- V. The present appeal has been filed to entangle the Department unnecessarily litigation and to waste the precious time of the respondents as well as of this Hon'ble Tribunal.
- VI. That the present appeal is against the relevant provision of law and rules.
- VII. That in the instant service appeal the appellant has suppressed material facts from this Honourable Tribunal which are sin-qua-non for the just and fair disposal of the case.

**FACTS.**

1. Para-1 pertain to record, however the appellant is liable to serve the Respondent Department in the said capacity for which she has been recruited and each and every civil servant falling under the ambit of section-2 (b) of KPK, Civil Servant Act 1973 is legally bound to Serve the Respondent Department to the entire satisfaction of the Competent Authority against the post for which she being paid by the Respondent Department from the National exchequer.
2. Incorrect and not admitted. That the inquiry officer in finding of his inquiry report stated that the appellant (Mst. Yahya Begum) SIPE has committed misconduct by narrating story to irrelevant persons and exposing the internal situation of school to person who were not authorized in this regard.
3. As explained in forgoing para. The inquiry officer stated that the appellant has committed misconduct and the Deputy Director (Establishment) has suggested censure to her and her transfer from that school.
4. Correct that the Deputy Director (Establishment) has suggested censure to her and her transfer from that school, hence as recommended by the Deputy Director, the appellant has been transferred.

5. That under Section 10 of Civil Servant Act, the Competent Authority is empowered to transfer a civil servant from one place to another to meet the exigency of service as administration provided the terms and conditions of service were not adversely affected and the civil servant has no vested right to claim posting or transfer to any particular post at her choice nor she has any right to continue to hold at particular post at a particular place.
6. As the appellant admitted, that she is the patient of cancer. She has the option to retire on medical ground. This Honourable Tribunal may recommend to forward her case to medical board as she is not able to perform her duty.
7. That no Departmental appeal has been filed by the appellant against the impugned transfer order dated 26-07-2019, hence the instant appeal needs to be dismissed inter alia the following grounds.

### **Grounds**

- A. Incorrect and denied, the impugned Notification dated 26-07-2019 of the Respondent No. 1 is within legal sphere and is liable to be maintained in favor of the Respondent Department in the interest of justice and is liable to be posted against the said post anywhere in the Province under the mandatory provisions of Section 10 of KPK, Civil Servant Act, 1973.
- B. Incorrect and denied. The statement of the appellant is against the facts and circumstances of the case as stated in the above mentioned paras of the instant reply. The appellant has been treated as per Law, Rules and Transfer and Posting policy of the Provincial Government.
- C. Incorrect and denied, the impugned Notification dated 26-07-2019 of the Respondent s within legal parameter and is liable to be maintained in the interest of equity of justice.
- D. As already explain in forgoing para.
- E. As already explained in forgoing para.
- F. That the prayer of the Appellant is directly relates to the terms and conditions of a civil servant falling under the ambit of Section 2(b) of KPK, Civil Servant Act 1973.
- G. Incorrect and denied, the impugned transfer Notification dated 26-07-2019 of the Respondent No. 1 is within legal sphere and is liable to be maintained.
- H. That the Respondents may kindly be allowed to submit any other ground /record at time of arguments on the date fixed.

**In view of the above made submissions, it is, therefore, most humbly prayed that this Honourable Court may very graciously be pleased to dismiss the writ appeal with cost in favour of the Respondents in the interest of justice.**

  
**Secretary**  
**E&SE Department.**

**"B"**

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

No.

Appeal No. 1558 of 20 19

Mst. Yahya Begum Appellant/Petitioner

Versus

The Chief Secy ICP Peshawar Respondent

Respondent No. 3

Notice to: —

The Director (E & SE) Deptt.  
ICP Peshawar.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on 23/9/2020 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this 15/11.....

Day of..... Sep 20 20

*(for Reply)*  
[Signature]  
16 Sep 2020

[Signature]  
Registrar

) Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

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



**KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL, PESHAWAR**

No. 1086 /ST

Dated: 18/05 2022

All communications should be addressed to the Registrar KPK Service Tribunal and not any official by name.

Ph:- 091-9212281  
Fax:- 091-9213262

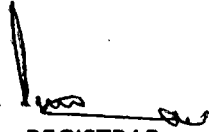
To

The Secretary E&SE,  
Government of Khyber Pakhtunkhwa,  
Peshawar.

Subject: JUDGMENT IN APPEAL NO. 1558/2019 MST. YAHYA BEGUM.

I am directed to forward herewith a certified copy of Judgement dated 02.02.2021 passed by this Tribunal on the above subject for compliance please.

Encl: As above

  
REGISTRAR  
KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL  
PESHAWAR





**KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL, PESHAWAR**

No: 2116-17 /ST Dated: 29 / 6 /2022

All communications should  
addressed to the Registrar  
KPK Service Tribunal and  
any official by name.

Ph:- 091-9212281  
Fax:- 091-9213262


To,

- 1 SECRETARY ELEMENTARY AND SECONDARY EDUCATION  
DEPARTMENT, KHYBER PAKHTUNKHWA PESHAWAR.
- 2 DIRECTOR (E&SE) DEPARTMENT, KHYBER PAKHTUNKHWA  
PESHAWAR.

Subject: PERSONAL APPEARANCE IN EXECUTION PETITION NO.  
237/21 IN CASE TITLE Mst. YAHYA BEGUM VS EDUCATION

I am directed to forward herewith a certified copy of Order dated  
16.06.2022 passed by this Tribunal on the above subject for strict compliance.

Encl: As Above.

  
(WASEEM AKHTAR)

REGISTRAR  
KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL  
PESHAWAR