


ORDER
12.01.2023


SCANNED
BT
Pawar

Nemo for the appellant. Mr. Muhammad Jan, District Attorney
for the respondents present.

The appeal in hand was called on for hearing after various
intervals; however none appeared on behalf of the appellant till the
closing time, therefore, the appeal in hand stands dismissed in default.
Parties are left to bear their own costs. File be consigned to the record
room.

ANNOUNCED
12.01.2023


(Mian Muhammad)
Member (E)

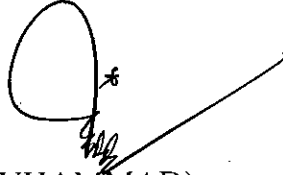

(Salah-Ud-Din)
Member (J)

05.07.2022

Nemo for the appellant.

Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Previous date was changed on Reader Note, therefore, notice for prosecution of the appeal be issued to the appellant as well as her counsel through registered post and to come up for arguments before the D.B on 13.10.2022.



(MIAN MUHAMMAD)
MEMBER (EXECUTIVE)

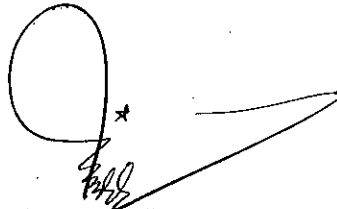


(SALAH-UD-DIN)
MEMBER (JUDICIAL)

13.10.2022

Nemo for the appellant. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Notice for prosecution of the appeal be issued to the appellant as well as his counsel through registered post and to come up for arguments on 18.11.2022 before the D.B.



(Mian Muhammad)
Member (E)



(Salah-Ud-Din)
Member (J)


18th Nov. 2022

Lawyers are on strike today.

Case is adjourned to 12.01.2023 for arguments before the DB. Office is directed to notify the next date on the notice board as well as website of the Tribunal.



(Fareeha Paul)
Member(E)



(Rozina Rehman)
Member(J)


Counsel was informed telephonically for the date fixed 13/10/2022

Counsel was informed telephonically for the date fixed on 10/10/22

23.11.2021 Proper D.B is not available, therefore, case is adjourned
to 11 / 2 / 2022 for the same as before.



Reader

Due to retirement of the
Hon'ble Chairman to come up for the
same as before on 28-03-2022


Reader

28-3-2022

Proper DB not available the
case is adjourned to come up for
the same as before on 5-7-2022


Reader

23.09.2021

Clerk of counsel for the appellant and Mr. Asif Masood Ali Shah, DDA for the respondents present.

Learned counsel for the appellant is not in attendance and request for adjournment is made on his behalf. Therefore, case to come up on 05/11/21 for arguments before the D.B.



(Rozina Rehman)
Member(Judicial)



Chairman

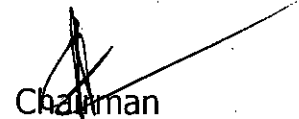
05.11.2021 Appellant present through counsel.

Javid Ullah, learned Assistant Advocate General for respondents present.

Former made a request for adjournment in order to prepare the brief. Request is accorded. To come up for arguments on 23.11.2021 before D.B.



(Rozina Rehman)
Member (J)



Chairman

29.12.2020

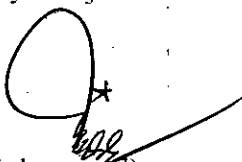
Due to summer vacation, case is adjourned to 16.3.2021 for the same as before.


Reader

16.03.2021


Mr. Shakeel Khan Advocate on behalf of learned counsel for the appellant and Mr. Noor Zaman Khattak, District Attorney for the respondents present.

Former requests for adjournment as learned counsel for the appellant is busy before the Hon'ble High Court in various cases today. Adjourned to 27.04.2021 for hearing before the D.B.


(Mian Muhammad)
Member (E)


Chairman

27.4.2021

Due to COVID-19, the case is adjourned to 17-8-2021 for the same. 

17.08.2021

Since 17.08.2021 has been declared as Public holiday on account of Moharram, therefore, case is adjourned to 23.09.2021 for the same as before.


Reader

17.08.2020

Due to summer vacations, the case is adjourned to
28.10.2020 for the same.


Reader

28.10.2020

Proper D.B is on Tour, therefore, the case is
adjourned for the same on 29.12.2020 before D.B.


Reader

30.06.2020

Junior to counsel for the appellant present.

Mr. Kabir Ullah Khattak learned Additional Advocate General for the respondents present.

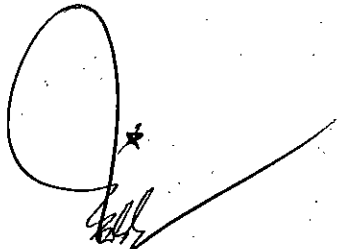
Written reply was not submitted. Learned AAG requested for adjournment for submission of written reply/comments. Last chance is given. To come up for submission of written reply/comments on 16.07.2020 before S.B.

16.07.2020

Appellant in person and Addl: AG for respondents present.

Written reply not submitted despite Member(U) Member(U) Member(U). Requested for further adjournment. Adjournment granted subject to payment of cost of Rs. 2000/- which shall be borne by respondents from their own pockets.

Adjourned to 29.07.2020 before S.B.


(Mian Muhammad)
Member(E)

29.07.2020

Counsel for the appellant and Addl. AG for the respondents present.

Respondents have not furnished the requisite reply/comments despite last chance. The matter is, therefore, posted to D.B for arguments on 17.08.2020.


Chairman

05.03.2020

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

Learned AAG seeks time to contact the respondents and submit written reply/comments. Adjourned to 20.03.2020 on which date the requisite reply/comments shall positively be submitted.


Member

20.03.2020

Clerk of counsel for the appellant and Mr. Kabirullah Khattak, Additional AG for the respondents present. Written reply on behalf of respondents not submitted. Learned Additional AG seeks further time to obtain written reply/comments from respondents. Adjourned to 07.04.2020 for written reply/comments before S.B.


(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

07.04.2020

Due to public holiday on account of COVID-19, the case is adjourned to 30.06.2020 for the same. To come up for the same as before S.B.


Reader

03.02.2020

None present on behalf of the appellant. Notices be issued to appellant and her counsel for attendance and preliminary hearing for 20.02.2020 before S.B.

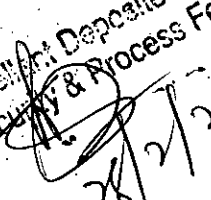

(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

20.02.2020

Counsel for the appellant Mst. Asia Sarder present. Preliminary arguments heard. It was contended by learned counsel for the appellant that the appellant was promoted alongwith others from BPS-18 to BPS-19 on the recommendation of Provincial Selection Board and on promotion, the appellant was adjusted from Government Girls Higher Secondary University Town Peshawar as a Principal BPS-19 to Government Girls Higher Secondary Shaidu Nowshera against the vacant post vide order dated 18.12.2019. It was further contended that in compliance with the said order, the appellant went to the Government Girls Higher Secondary Shaidu Nowshera for assuming the charge but the Ex-Vise Principal Bushra Begum of Government Girls Higher Secondary Shaidu Nowshera and one Clerk Bilal of the said school did not allow her to assumed the charge therefore, she submitted application on 24.12.2019 to the Secretary Education followed by another application (undated) available at page 18 of the service appeal but with no fruitful result, therefore, ultimately the appellant filed departmental appeal but the same was also not responded, therefore, on 23rd December 2019 she submitted arrival report in the office of District Education Officer Female, therefore, the respondent-department are bound to allow the appellant for assumption of charge.

The contention raised by learned counsel for the appellant need consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days, thereafter, notices be issued to the respondents for written reply/comments for 05.03.2020 before S.B. Learned counsel for the appellant also submitted application for adjustment in the school mentioned in the application. Notice of the same be issued to the respondents for the date fixed.


(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

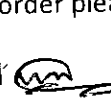


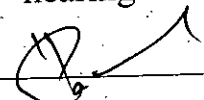
Appellant: Deposited
Security & Process Fee

28/2/2020

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. - 270/2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	08/01/2020	<p>The appeal of Mst. Asia Sardar resubmitted today by Mr. Habibullah Mohmand Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR 08/01/2020</p>
2-	10/01/20	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>16/01/20</u></p> <p> CHAIRMAN</p>
	16.01.2020	<p>Nemo for appellant.</p> <p>Notices be issued to appellant/counsel for preliminary hearing on 27.01.2020 before S.B.</p> <p> Chairman</p>
	27.01.2020	<p>Appellant absent. Learned counsel for the appellant absent. Due to general strike of the bar, on call of Khyber Pakhtunkhwa Bar Council, the case is adjourned. To come up for preliminary hearing on 03.02.2020 before S.B.</p> <p> Member</p>

P-30?
in p order?

Member

The appeal of Mst. Asia Sardar received today i.e 1/1/2020 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.


1. No specific order has been impugned under Section-4 of Khyber Pakhtunkhwa Service Tribunal Act 1974.
2. Annexures of the appeal may be flagged.


REGISTRAR -
KPK SERVICE TRIBUNAL
PESHAWAR

No 11 /ST

DATED 6-1- /2020

Habibullah, Advocate

All objections have been removed and
on fact there are different impugned
orders but at the time of
arguments the learned Council
shall assist the august
tribunal Dated
 6/1/2020

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR**

Service Appeal No. 270 /2019

Mst. Asia Saïdar.....(Appellant)

V E R S U S

Govt of KP through Secretary Elementary and Secondary
Education and another.....(Respondents)


N D E X

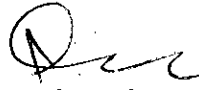
S.No.	Description of Documents	Annex	Pages
1.	Service Appeal		1-6
2.	Affidavit		7
3.	Addresses of the Parties		8
4.	Application with affidavit		9-11
5.	Copies of all relevant documents	A	12-29
6.	Copy of departmental appeal/ representation	B/e	30-31
7.	Wakalat Nama		32

Appellant

Through

Dated: 30/12/2019


Habib Ullah Mohmand
Advocate High Court,
Peshawar.

& 
Muhammad Asim
Advocate Peshawar.
Cell: 0321-9087842

1

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Khyber Pakhtunkhwa Service Tribunal

Service Appeal No. 270/2020

Diary No. 02

Dated 01-01-2020

Mst. Asia Saifdar, SS (Home Economics) BPS-19, Government Girls Higher Secondary School, University Town, Peshawar.....(Appellant)

V E R S U S

1. Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education, Civil Secretariat, Peshawar.
2. Director Elementary and Secondary Education, Hashtnagri, G.T. Road, Peshawar.
3. District Education Officer (F), Hashtnagri, G.T. Road Peshawar.....(Respondents)

Filed to-day
Registrar
01-01-2020

APPEAL UNDER SECTION 4 OF KHYBER PUKHTUNKHWA SERVICE TRIBUNAL ACT 1974, THAT APPELLANT SUBMITTED THE DEPARTMENTAL APPEAL BEFORE THE RESPONDENTS DEPARTMENT AGAINST THE IMPUGNED TRANSFER ORDER, BUT AFTER PASSING OF STATUTORY PERIOD THERE IS NO RESPONSE FROM THE RESPONDENTS DEPARTMENT AND THE RESPONDENTS DEPARTMENT DID NOT ADJUSTED THE APPELLANT IN THE PARENT DEPARTMENT i.e. DISTRICT PESHAWAR.

Re-submitted to -day and filed.
Registrar
08/11/2020

Respectfully Sheweth:

2

1. That the appellant is law abiding citizen of Pakistan having fundamental rights which is guaranteed by the Constitution of Islamic Republic of Pakistan, 1973.
2. That the respondents department constitute a committee for promotion as PSB (Provincial Selection Board) on dated 23/09/2019 in which the present appellant was promoted BPS-18 to BPS-19 as Principal BPS-19 and the appellant also wants to take the charge on the basis of domicile, but the respondents department refusing/ denying for not taking charge, which is against the law and also against the norms of justice.
3. That appellant was initially recommended for promotion from BPS-18 to BPS-19 by the respondents department on 22/10/2019 on domicile based policy in which respondents department scrutinized/ verified the appellant domicile of newly promoted employees of respondents department.

3

4. That the appellant also submitted twice appeals before the respondents department to adjust the appellant at District Peshawar on the basis of domicile and due to school going children at District Peshawar, apart from that other colleagues/ batch mates of the appellant which were newly promoted from BPS-18 to BPS-19 in which they were adjusted/transferred at District Peshawar even their domiciles belongs to other districts, while the appellant is discriminated which is against the law.
5. That in fact the appellant also submit an application before the authority to adjust/ transfer the appellant on newly lying vacant post at District Khyber i.e. Government Girls High School, Jamrod while other colleges/ batch mates of the appellant were adjusted on the basis of political approach/ political influence, while the appellant is denying, which is against the law and also against the norms of justice.
6. That the respondents department is duty bound to follow the domicile based policy, but the

respondents department himself violated that policy because of appointing the other employees of different domiciles holders of different districts, which is against the law and also against the norms of justice.

7. That the appellant children are school going and also admitted at District Peshawar in different schools of Hayatabad, Peshawar and if the appellant did not adjusted/ transferred to district Peshawar the appellant shall faces irreparable loss in the near future. (Copies of all relevant documents are attached as annexure "A").

8. That according to authentic and reliable sources that so many posts of BPS-19 are lying vacant at District Peshawar, but despite of that the appellant departmental appeal has not been consider for redressal her grievances.

9. That the respondents department cannot transfer the appellant without the consent of the appellant being a government employee nor transfer to another district on the basis of domicile as well as

on school going children as well as other domestic problems etc.

10. That it is pertinent to mention here that birth certificates and domiciles of the children of the appellant belonged to District Peshawar, therefore the appellant is entitled for adjustment in District Peshawar on any other lying vacant post i.e. BPS-19 at Government Girls High School, Jamrod, District Peshawar.
11. That at last the appellant submit a departmental appeal/representation before the authority on dated 25/09/2019 after passing of statutory period but there is no response. (Copy of departmental appeal/representation is attached as annexure "B").
12. That appellant will take other grounds at the time of arguments with the prior permission of this Hon'ble Tribunal.

It is, therefore, most humbly prayed that by accepting of this Service Appeal, that the impugned transfer order of respondents department may

kindly be declared as null and void, void-ab-initio and may also be cancel/set aside to the extent of the appellant and the appellant may kindly be adjusted/ transferred at District Peshawar on any other lying post i.e. BPS-19 including Government Girls High School, Jamrod, Khyber, for which the appellant is entitled/ eligible for the sake of justice.

6

Appellant

Through



Dated: 30/12/2019

Habib Ullah Mohmand
Advocate High Court,
Peshawar.

&



Muhammad Asim
Advocate Peshawar.

7

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _____/2019

Mst. Asia Saïdar.....(Appellant)

V E R S U S

Govt of KP through Secretary Elementary and Secondary Education and another.....(Respondents)

AFFIDAVIT

I, Mst. Asia Saïdar, SS (Home Economics) BPS-18, Government Girls Higher Secondary School, University Town, Peshawar, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.



DEPONENT

CNIC: 17201-2108111-2

(7)

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR**

Service Appeal No. _____/2019

Mst. Asia Saifdar.....(Appellant)

V E R S U S

Govt of KP through Secretary Elementary and Secondary
Education and another.....(Respondents)

ADDRESSES OF THE PARTIES

APPELLANT:

Mst. Asia Saifdar, SS (Home Economics) BPS-18, Government
Girls Higher Secondary School, University Town, Peshawar.


RESPONDENTS:

1. Government of Khyber Pakhtunkhwa through Secretary
Elementary and Secondary Education, Civil Secretariat,
Peshawar.
2. Director Elementary and Secondary Education, Hashtnagri,
G.T. Road, Peshawar
3. District Education Officer (F), Hashtnagri, G.T. Road,
Peshawar.

Appellant

Through

Dated: 30/12/2019


Habib Ullah Mohmand
Advocate High Court,
Peshawar.

&

Muhammad Asim
Advocate Peshawar.

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

C.M. No. _____/2019

In

Service Appeal No. _____/2019

Mst. Asia Saifdar.....(Appellant)

V E R S U S

Govt of KP through Secretary Elementary and Secondary Education and another.....(Respondents)

APPLICATION FOR SUSPENSION OF THE OPERATION OF ALL THE IMPUGNED TRANSFER ORDERS TO THE EXTENT OF APPELLANT, TILL THE FINAL DECISION OF THE MAIN SERVICE APPEAL.

Respectfully Sheweth:

1. That the above titled Service Appeal is being filed before this Hon'ble Tribunal, in which no date of hearing has yet been fixed.
2. That on the face of it, the appellant has got a strong arguable case and is sanguine about its success.

3. That the balance of convenience also lies in favour of appellant.

10

4. That if the operation of the impugned transfer order is not suspended then the appellant would sustain irreparable loss.

It is, therefore prayed that on acceptance of this application, the operation of the impugned transfer order may kindly be suspended, and any other vacant post of BPS-19 which are lying vacant in District Peshawar may not be filled specially Government Girls High School Jamrod, District Khyber, till the final disposal of the main Service Appeal.

Appellant

Through



Habib Ullah Mohmand
Advocate High Court,
Peshawar.

&



Muhammad Asim
Advocate Peshawar.

Dated: 30/12/2019

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR**

C.M. No. _____/2019

11

In

Service Appeal No. _____/2019

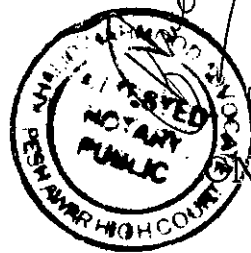
Mst. Asia Saifdar.....(Appellant)

V E R S U S

Govt of KP through Secretary Elementary and Secondary
Education and another.....(Respondents)

AFFIDAVIT

I, Mst. Asia Saifdar, SS (Home Economics) BPS-18,
Government Girls Higher Secondary School, University Town,
Peshawar, do hereby solemnly affirm and declare on oath that
the contents of the accompanying **Application** are true and
correct to the best of my knowledge and belief and nothing has
been concealed from this Hon'ble Tribunal



DEPONENT

NIC: 17201-2108111-2

12

To,
The secretary,
Elementary and Secondary Education,
Peshawar KPK.



SUBJECT: POSTING AS PRINCIPAL AGAINST VACANT POST AT GGHS JAMRUD.

Respected Sir,

It is stated that I am the resident of Hayatabad Peshawar. My children are studying in Peshawar.

I have been promoted from BS-18 to BS-19 principal. According to notification I have ^{been} given vacant post of principal in GGHSS Shaidu Nowshera which is very difficult for me.

The principal, MST Nafees Kausar, of GGHS Jamrud has been retired and post of principal became vacant.

Kindly allow me the said vacant post in order to perform my duty efficiently and actively without any tension.

I will be very thankful.

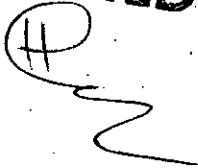


Yours sincerely

Asia Sardar

(As per order) Principal GGHSS Shaidu Nowshera.

ATTESTED



13

To,
The Secretary,
Elementary & Secondary Education, Department
Peshawar KPK

SUBJECT: Submission of Arrival Report

Respected Sir,

It is stated that according to the notification no. So (S/F) SED/3-2/2019/promotion / BS-18 to BS-19/TC, I, MST Asia Sardar SS(Home Economics) BS-18 GGHSS university Town Peshawar promoted to principal (BS-19) GGHSS Shaidu Nowshera against vacants post. On 21-12-2019 (Saturday) I went GGHSS Shaidu NSR to give my arrival and take charge over here but there was the EX-Vice principal MST. Bushra Begum of GGHSS Shaidu Nowshera and the clerk Bilal of the same school did not give me the charge because both of them were in collusion. They wasted my time that's why I cannot report you on time.

I am the resident of Hayatabad (Peshawar). When I received the order of principal BS-19 GGHSS Shaidu NSR Vacant Post, I obey it at once and went to the school but the behavior of Ex-Principal was strange.

Now on Monday, 23rd Dec 2019, I went to the DEO office Nowshera and submit my arrival report in the office of DEO (F).

Thanks

Asia Sardar
Your's sincerely
Asia Sardar

(As per order) BS-19 GGHSS Shaidu NSR

HP
ATTESTED

4328
24/12/19



(14)

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

No. SENS(F)E&SED/4-16/2019/Promotion/Female
Dated Peshawar the October 23rd, 2019

To

1. Director (E&S),
Khyber Pakhtunkhwa, Peshawar
2. All District Education Officers (Female),
E&S E Khyber Pakhtunkhwa.

SUBJECT: VERIFICATION OF POSITIONS

I am directed to refer to the subject cited above and to ask you to verify the Domicile districts alongwith existing positions of the undermentioned candidates:

S. No.	Name of Officer	Domicile	Present Posting	Remarks
1	Mst Bibi Haroon	Swabi	SS (His-cum-civics) BS-18 GCHSS Kotha Swabi	
2	Mst Yasmin Akhtar	Kohat	SS Gen: BS-18 GGCHSS Peshawar	
3	Mst Fozla Barlas	D.I.Khan	Principal BS-18 GGCHSS Chapra Haripur	
4	Mst Shabnamzeb .Bibi	Munshera	SS (Bio) BS-18 GGCHSS A/Abad	
5	Mst Naheed Begum	Mardan	SS (Bio) BS-18 GGCHSS University Town Peshawar	
6	Mst Azhar Jan	Charsadda	Inst: BS-18 RITE (F) Rajjar Charsadda	
7	Mst Farzana Jabeen	Abbottabad	SS (Eng) BS-18 GGCHSS Dhamlor A/Abad	
8	Mst Nighat Qazi	Haripur	SS (B-18) GGCHSS KTS No. 2 Haripur	
9	Mst Asia Sardar	Nowshera	SS Home: Eco: BS-18 GGCHSS University Town Peshawar	

A
ATTEN

15

10	Mst Faris Tabassum	Peshawar	SS B-18 GGHS USD Peshawar
11	Mst Rashid An Lauja	DI Khan	SS (B-18) GGHS No 6 DI Khan
12	Mst Noushaba	Peshawar	SS BS-18 GGHS Comp Peshawar
13	Mst Sumaira Tariq	Chusadda	Ina PITE BS-18 Peshawar
14	Mst Robina Hayat	IDS W	V Principal BS-18 GGHS No 2 Bannu
15	Mst Farzana Safdar	Haripur	SS (B-18) GGHS KTS No 2 Haripur
16	Mst Naheeda	Manshra	SS GGHS Garhi Habibullah Manshra
17	Mst Saeeda Mufeed	Peshawar	SS Econ BS-18 GGHS University Town Peshawar
18	Mst Shakila Parveen	Peshawar	Instructor B-18 RTE (F) Peshawar
19	Mst Fauzia Jamil	Kohat	SS (B-18) GGHS Jungle Khel Kohat
20	Mst Rahila Rehmat	Bannu	SS (Stat) B-18 GGHS University Town Peshawar
21	Mst Farzana Bibi	Lakki Marwat	Vice Principal BS-18 GGCMHS Lakki Marwat
22	Mst Shabana Sadiq	Haripur	SS (Physics) BS-18 GGHS KTS Sector No. 2 Haripur
23	Mst Bushra Begum	Dir	SS (Bio) BS-18 GGHS Ziarat Talash Dir Lower
24	Mst Hamida Bano	Swat	Principal BS-18 GGHS Akbar Pura Nowshera
25	Mst Sabiha	Swabi	Principal GGHS Paripar Swabi

11

Pr

34	Mst. Sakhir Bhatti	Peshawar	SS (Physical) BS-18 GGHSS Jopur Peshawar
35	Mst. Mansoor Akbar	Mansoor	SS BS-18 GGHSS Harwan A/Abad
36	Mst. Sakhir Begum	Peshawar	VP BS-18 GGHSS Sharda Peshawar
37	Mst. Sakhir Begum	Peshawar	Principal BS-18 GGHSS Nissa Charasadda
38	Mst. Sakhir Begum	Mansoor	BS-18 Dy. DEO (F) A/Abad
39	Mst. Sakhir Begum	Mansoor	Asst. Principal BS-18 GGHSS Umerza Charasadda
40	Mst. Sakhir Begum	Mansoor	Principal BS-18 GGHSS Dheri Talagum Mkd
41	Mst. Sakhir Begum	Mansoor	Principal BS-18 GGHSS Kharaka Mkd
42	Mst. Sakhir Begum	Charasadda	SS Chem BS-18 GGHSS Comp. Peshawar
43	Mst. Sakhir Begum	Abbottabad	SS (Chem) BS-18 GGHSS A/Abad
44	Mst. Sakhir Begum	Abbottabad	SS BS-18 GGHSS A/Abad
45	Mst. Musarrat Fida	Karak	SS (Eng) BS-18 GGHSS Babri Banda Kohat
46	Mst. Fizza Hina	Mansoor	V Principal BS-18 GGHSS Comp. A/Abad
47	Mst. Tabasum Ara	Haripur	SS BS-18 GOCMS Kot Najeebullah Haripur
48	Mst. Nousheen Syeda	Peshawar	SS BS-18 GOCMS Kot Najeebullah Haripur
49	Mst. Bibi Sajida	Abbottabad	V Principal BS-18 GGHSS Kuthyala A/Abad

Handwritten signature and initials at the bottom of the page.

17

41	Mrs Andleeb	Abbottabad	Principal BS-18 GGHS Lara Abbottabad
44	Mrs Rubina Bibi	Dt Lahore	SS (In-charge) BS-18 GGHS Old Peshawar
45	Mrs Saeda Begum	FDSA	Principal BS-18 GGHS Jinnah Charadda
46	Mrs Musarrat Arman	Sweet	SS BS-18 GGHS Manghwar Sweet
47	Mrs Shaira Parveen	Kodial	SS BS-18 GGHS Jangh Kodial Kohat
48	Dr Safia Noor	TD Mehranad	Principal BS-18 GGHS Inst. PITE Peshawar
49	Mrs Farah Naz	Harpur	SS BS-18 GGHS A/Abad
50	Mrs Riffat Begum	Charadda	SS (PS) BS-18 GGHS Sherpan Charadda
51	Mrs Sajida Bibi	Abbottabad	Vice Principal BS-18 GGHS Kakul A/Abad
52	Mrs Najia Ambreen	D.I Khan	Pr: BS-18 GGHS Haza DIKhan
53	Mrs Foza Amin	D.I Khan	SS BS-18 GGHS No. 2 DIKhan
54	Mrs Naz Begum	Peshawar	Principal BS-18 GGHS Wadpaga Peshawar

I am further directed to request that the same may be submitted by tomorrow before closing hours.

AK *[Signature]* 22/10
LAKHNAWATI
SECTION OFFICER (B7)

Ends: of even No. & Date:

Copy forwarded to the PS to Secretary, E&SE Department.

[Handwritten Signature]
SECRETARY

SECRET

17

The Secretary to Govt. of Khyber Pakhtunkhwa,
Elementary & Secondary Education, Department.

Subject: Request for posting on promotion to bps-19

Dear Sir,

With due respect it is stated that I have been perform my duties as Subject Specialist (Home Economics) BPS-18 at GGHSS, University Town, Peshawar and now recommended for promotion to BPS-19 by the Provincial Selection Board in its recently held meeting. In this connection it is further stated that my family is residing at Hayatabad which includes my school going children and old aged in-laws whose care and responsibility is on my shoulders.

In view of above, it is requested that I may kindly be posted as Principal at any one of the following schools where the posts of Principals are lying vacant.

- i. GGHSS Bara Lanes, Peshawar
- ii. GGHSS Civil Quarters, Peshawar
- iii. GGHSS, Yakutoot, Peshawar
- iv. GGHSS, Jogiwara, Peshawar.

I shall be thankful to you for this kindness forever.

Yours faithfully,



Mst. Asia Sardar
Subject Specialist (Home Economics)
GGHSS, University Town
Peshawar


ATTESTED



19

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

Dated Peshawar the December 18th, 2019

NOTIFICATION

No. SO(S/F)E&SED/3-2/2019/Promotion/BS-18 to BS-19/TC:

Consequent upon

recommendation(s) of the Provincial Selection Board (PSB) in its meeting held on 23-09-2019, the Competent Authority is pleased to promote the following 54 Female Teaching Cadre Officers of Elementary & Secondary Education Department from BS-18 to BS-19 on regular basis.

2. Consequent upon above, they are hereby posted against the mentioned posts, with immediate effect:

S. No	Name of Officer	Present Posting	Domicile	Posted As
1	Mst. Bibi Haroon	SS (His-cum-Civics) BS-18, GGHSS Kotha Swabi	Swabi	Principal (BS-19) GGHSS Baja, Swabi Against Vacant Post
2	Mst. Yasmin Akhtar	SS (English) BS-18, GGCHSS Peshawar	Kohat	Principal (BS-19) GGHSS Lachi Kohat Against Vacant Post
3	Mst. Fozia Barlas	SS (BS-18) GGHSS Havelian Abbottabad	D.I.Khan	Principal (BS-19) GGHSS Barawal Dir Upper Against Vacant Post
4	Mst. Bibi Shabnamzeb	SS (Biology) BS-18, GGCHSS Abbottabad	Mansehra	Principal (BS-19) GGHSS No. 2 Mansehra Vice Sr. No. 55
5	Mst. Naheed Begum	SS (Biology) BS-18, GGHSS University Town Peshawar	Mardan	Principal (BS-19) GGCMHS Canal Road Mardan Against Vacant Post
6	Mst. Azhar Jan	Instructor (BS-18) RITE (F) Rajjar Charsadda	Charsadda	Principal (BS-19) GGHS No. 1 Sarai Naurang Lakki Marwat Against Vacant Post
7	Mst. Farzana Jabeen	SS (English) BS-18, GGHSS Dhamtor Abbottabad	Abbottabad	Senior Instructor (BS-19) RITE (F) Abbottabad Against Vacant Post
8	Mst. Nighat Qazi	SS (English) BS-18, GGHSS KTS No. 2 Haripur	Haripur	Principal (BS-19) GGHSS Seri Kot, Haripur Against Vacant Post
9	Mst. Asia Sardar	SS (Home Economics) BS-18, GGHSS University Town Peshawar	Nowshera	Principal (BS-19) GGHSS Shaidu Nowshera Against Vacant Post

ATTESTED

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10	Mst. Laila Tabassum	SS (BS-18) GCHSS Begum Shahabud Din Peshawar	Peshawar	Principal (BS-19) GCHSS Usterzal Kohat Against Vacant Post
11	Mst. Roohul Ain Lalqa	Principal (BS-19) GCHSS Paharpur D.I.Khan (own pay & scale)	D.I.Khan	Principal (BS-19) GCHSS Paharpur D.I.Khan Already occupied by her
12	Mst. Noushaba	SS (General) BS-18 GCHSS Peshawar	Peshawar	Principal (BS-19) GCHSS Kernal Sheer Killay Swabi Against Vacant Post
13	Mst. Sumaira Taj	Instructor (BS-18) PITE (F) Peshawar	Charsadda	Principal (BS-19) GCHSS Dhakki Charsadda Vice Sr. No. 56
14	Mst. Robina Hayat	Vice Principal (BS-18) GCHS No. 2 Bannu	T.D.S.W	Principal (BS-19) GCHSS Sikandar Khel Bala, Bannu Against Vacant Post
15	Mst. Farzana Safdar	SS (BS-18) GCHSS KTS No. 2 Haripur	Haripur	Principal (BS-19) GGHS Joulain, Haripur Against Vacant Post
16	Mst. Naheeda	SS (BS-18) GCHSS Garhi Habibullah Mansehra	Mansehra	Principal (BS-19) GCHSS Thathi Khurd Mansehra Against Vacant Post
17	Mst. Saeeda Mufeed	SS (Economics) BS-18, GCHSS University Town Peshawar	Peshawar	Principal (BS-19) GCHSS Rustam Mardan Against Vacant Post
18	Mst. Shakila Parveen	Instructor (BS-18) RITE (F) Peshawar	Peshawar	Principal (BS-19) GCHSS Kunda Swabi Against Vacant Post
19	Mst. Fauzia Jamil	SS (BS-18) GCHSS Jungle Khel Kohat	Kohat	Principal (BS-19) GCHSS Billitang Kohat Against Vacant Post
20	Mst. Rahila Rehmat	SS (Statistics) BS-18, GCHSS University Town Peshawar	Bannu	Principal (BS-19) GGHS Civil Quarter Peshawar Vice Mst. Naghmana Niamat, being promoted to BS-20
21	Mst. Bibi Farzana	Vice Principal (BS-18) GGCMHS Lakki Marwat	Lakki Marwat	Principal (BS-19) GGHS No. 2 Lakki Marwat Vice Mst. Bibi Zubaida, being promoted to BS-20
22	Mst. Sadiq Shabana	SS (Physics) BS-18, GCHSS KTS Sector No. 2 Haripur	Haripur	Principal (BS-19) GCHSS Kot Najibullah Haripur Against Vacant Post
23	Mst. Bushra Begum	SS (Biology) BS-18, GCHSS Ziarat Talash Dir Lower	Dir	Principal (BS-19) GGCMHSS Timergara Dir Lower Against Vacant Post

ATTESTED

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24	Mst. Hamida Bano	Principal (BS-18) GGHSS Akbar Pura Nowshera	Swat	Principal (BS-19) GGHS Yakatoot Peshawar Against Vacant Post
25	Mst. Sabiha	Instructor (BS-18) RITE (F) Swabi	Swabi	Principal (BS-19) GGHS Marghuz Swabi Against Vacant Post
26	Mst. Nagina Sayal	SS (Physics) BS-18, GGHSS University Town Peshawar	Peshawar	Principal (BS-19) GGHSS Ghallanai TD Mohmand Against Vacant Post
27	Mst. Bakht Bibi	SS (Physics) BS-18, GGHSS Jogiwara Peshawar	Peshawar	She is retained as SS (Physics) BS-18, GGHS Jogiwara Peshawar, as she has forgone her promotion
28	Mst. Nasreen Aslam	SS (BS-18) GGHS Havelian Abbottabad	Mansehra	Principal (BS-19) GGHS Lissan Nawab Mansehra Against Vacant Post
29	Mst. Bushra Begum	Vice Principal (BS-18) GGHS Shaidu Nowshera	FR Bannu	Principal (BS-19) Shahbaz Azmat Khel Bannu Against Vacant Post
30	Mst. Pukraj Gul	Principal (BS-18) GGHS Nisata Charsadda	Peshawar	Principal (BS-19) GGHS Samarbagh Dir Lower Against Vacant Post
31	Mst. Tahira Jabeen	SS (BS-18) DCTE Abbottabad	Haripur	Principal (BS-19) GGHS Dir Upper Against Vacant Post
32	Mst. Ismat Ara	Vice Principal (BS-18) GGHS Umerzai Charsadda	Peshawar	Principal (BS-19) GGHS Panjpir Swabi Against Vacant Post
33	Mst. Gul Shaida	Principal (BS-18) GGHS Dheri Julagram Malakand	Malakand	Principal (BS-19) GGHS Julagram Malakand Vice Sr. No. 62
34	Mst. Gohar Sani	Principal (BS-18) GGHS Kharakai Malakand	Malakand	Principal (BS-19) GGHS Palai Malakand Against Vacant Post
35	Mst. Noorul Basar	SS (Chemistry) BS-18, GGCHSS Peshawar	Charsadda	Principal (BS-19) GGHS Kubar Dir Lower Against Vacant Post
36	Mst. Kausar Tanveer	SS (Chemistry) BS-18, GGCHSS Abbottabad	Abbottabad	Principal (BS-19) GGHS Khwazakhela Swat Vice Sr. No. 57
37	Mst. Samina Gul	SS (BS-18) GGCHSS Abbottabad	Abbottabad	Principal (BS-19) GGHS Kakul Abbottabad Against Vacant Post
38	Mst. Musarrat Fida	SS (English) BS-18, GGHSS Babri Banda Kohat	Karak	Principal (BS-19) GGHS Karak Against Vacant Post

ATTESTED

39	Mst. Fozia Hina	Instructor (BS-18) RITE (F) Abbottabad	Mansehra	Principal (BS-19) GGHSS Phulra Mansehra Vice Sr. No. 63
40	Mst. Tabassum Ara	SS (BS-18) GGCMHS Kot Najeebullah Haripur	Haripur	Principal (BS-19) GGHSS Pannian Haripur Against Vacant Post
41	Mst. Syeda Nousheen	SS (BS-18) GGCMHS Kot Najeebullah Haripur	Peshawar	Principal (BS-19) GGHSS Bagra Haripur Vice Mst. Samina Mushtaq, being promoted to BS-20
42	Mst. Bibi Sajida	Instructor (BS-18) RITE (F) Mansehra	Abbottabad	Principal (BS-19) GGHSS Shergarh Mansehra Vice Sr. No. 58
43	Mst. Andaleeb	Principal (BS-19) GGHSS Lora Abbottabad (own pay & scale)	Abbottabad	Principal (BS-19) GGHSS Lora Abbottabad Already occupied by her
44	Mst. Rukhsana Bibi	SS (His-cum-Civics) BS-18, GGHSS Begum Shahabud Din Peshawar	Dir Lower	Principal (BS-19) GGHSS Mayar Dir Lower Against Vacant Post
45	Mst. Saeeda Begum	Principal (BS-19) GGHSS Tordher Swabi (own pay & scale)	TDSW	Principal (BS-19) GGHSS Tordher Swabi Already occupied by her
46	Mst. Musarrat Aman	SS (BS-18) GGHSS Manglower Swat	Swat	Principal (BS-19) GGHSS Matta, Swat Vice Sr. No. 59
47	Mst. Shaista Parveen	SS (BS-18) GGHSS Jungle Khel Kohat	Kohat	Principal (BS-19) GGHSS Babri Banda Kohat Against Vacant Post
48	Dr. Safia Noor	Instructor (BS-18) PITE (F) Peshawar	TD Mohmand	Principal (BS-19) GGHSS Prang Charsadda Against Vacant Post
49	Mst. Farah Naz	SS (BS-18) GGCHSS Abbottabad	Haripur	Principal (BS-19) GGHSS Havelian Abbottabad Vice Mst. Rizwana Saeed, being promoted to BS-20
50	Mst. Riffat Begum	SS (Pak Study) BS- 18, GGHSS Sherpao Charsadda	Charsadda	Principal (BS-19) GGHSS Rabat Dir Lower Against Vacant Post
51	Mst. Sajida Bibi	Vice Principal (BS- 18) GGHSS Kakul Abbottabad	Abbottabad	Principal (BS-19) GGHSS Oghi Mansehra Against Vacant Post

ATTESTED

23

52	Mst. Najia Ambreen	Principal GGHS D.I.Khan	(BS-18) Hassa	D.I.Khan	Principal (BS-19) GGHS No. 1 Lakki Marwat Against Vacant Post
53	Mst. Fozia Amin	SS (BS-18) GGHS No. 2 D.I.Khan		D.I.Khan	Principal (BS-19) GGHS No. 2 Tank Against Vacant Post
54	Mst. Naz Begum	Principal GGHS Peshawar	(BS-18) Wadpaga	Peshawar	Principal (BS-19) GGHS Chowkara Karak Against Vacant Post
CONSEQUENTIAL TRANSFERS					
55	Mst. Fehmida Malik, Principal (BS-18)	Principal GGHS Mansehra	(BS-19) No. 2	-	At the disposal of Directorate of E&SE
56	Mst. Taskeen, Principal (BS-18)	Principal GGHS Charsadda	(BS-19) Dhakki	-	Principal (BS-18) GGHS Dosehra Charsadda Vice Sr. No. 60
57	Mst. Yasmin Bibi, SS (Bio) BS-17	Principal GGHS Swat	(BS-19) Khwazakhela	-	SS (Bio) BS-17 GGHS Kala Killay Swat Against Vacant Post
58	Mst. Sadaf Bashir, Principal (BS-18)	Principal GGHS Mansehra	(BS-19) Shergarh	-	At the disposal of Directorate of E&SE
59	Mst. Zuhra Bano, HM (BS-17)	Principal GGHS Matta, Swat	(BS-19)	-	HM (BS-17) GGHS Qandil Swat Against Vacant Post
60	Mst. Rozina, IPE (BS-17)	Principal GGHS Charsadda	(BS-18) Dosehra	-	IPE (BS-17) GGHS Misri Banda Nowshera Against Vacant Post
61	Mst. Mumlikat, Principal (BS-18)	Principal GGHS Malakand	(BS-19) Julagram	-	At the disposal of Directorate of E&SE
62	Mst. Nida, Principal (BS-18)	Principal GGHS Mansehra	(BS-19) Phulra	-	At the disposal of Directorate of E&SE

3. In terms of Section-6 (2) of Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rule-15 (i) of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989, the above female officers of the Teaching Cadre on their promotion shall be on probation for a period of one year.

ATTESTED

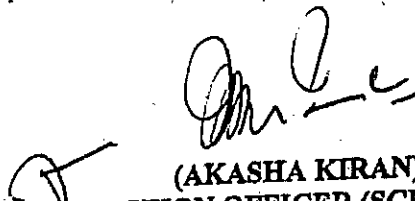
4. No TA/DA will be allowed for joining their duties.

24

**SECRETARY
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT**

Endst: of even No. & date:

- Copy forwarded to the:
- Accountant General Khyber Pakhtunkhwa, Peshawar.
- Director E&SE Khyber Pakhtunkhwa, Peshawar
- Director DCTE, Khyber Pakhtunkhwa, Abbottabad.
- Director PITE Khyber Pakhtunkhwa, Peshawar.
- Principals RITE (Female) Khyber Pakhtunkhwa.
- District Education Officers (Female) concerned.
- District Accounts Officers concerned.
- PS to Principal Secretary to Chief Minister, Khyber Pakhtunkhwa, Peshawar.
- PS to Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
- PS to Advisor for E&SE Khyber Pakhtunkhwa Peshawar.
- PS to Secretary E&SE Department.
- In-charge EMISE, E&SE Department for uploading at official website at the earliest.
- Officers concerned.
- Office order file.


(AKASHA KIRAN)
SECTION OFFICER (SCHOOLS
FEMALE)


ATTESTED

25

Class 4 Green Name Muhammad Musa Shah

Month	Annual Charges	Van	Total Due	Total Paid	Receipt No. and Date	Signature
April	6760		10,260	10,260	14830	[Signature]
May	6760		6760		15679	[Signature]
June	4			4	19864	[Signature]
July						
August						
September	6760		6760		18372	[Signature]
October	4			4	19864	[Signature]
November						
December						
January						
February						
March						

ATTESTED

[Signature]

Fee Rules

- 1) Fees should be paid on the 1st. day of each calendar month and in any case not later than the 10th of each month.
- 2) Reminders will be sent to parents after 10th and in case of non-payment after three reminders student will be suspended.
- 3) ~~Those who wish to pay in advance VOLUNTARILY can follow this schedule of payments for every session.~~
 - a) ~~Fees for February and March to be paid in February.~~
 - b) ~~Fees for May and June to be paid in April.~~
 - c) ~~Fees for July and August to be paid in May.~~
- 4) If the fees are not paid for two consecutive months, the name of the student will automatically be struck off the rolls. Re-admission will be subject to payment of all the admission charges and clearance of outstanding dues.
- 5) Parents or guardians who for some reason or other are unable to settle the account within the specified date should notify the Principal, stating the date when settlement will be made, which should in any case be, before the end of each month.

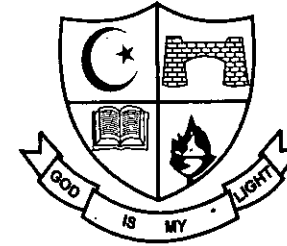
NOTE: Under no circumstances will Boys/Girls be admitted to the Terminal or Final Examination unless all dues have been paid.

- 6) Any parent or guardian who pays school fees for more than 3 months in advance should obtain signature of the Principal on fee receipt as well as on the fee card otherwise in case of any misappropriation, fraud or mishap, the Principal or the school shall have no responsibility what so ever.
- 7) Any parent or guardian who cannot wait for the fee receipt and fee card when paying the fee should obtain a temporary receipt from the accountant for the amount deposited and MUST get proper receipt from the accountant within a week.
- 8) Any parent or guardian making any kind of deal with any school employee without the consent of the Principal shall be at his own risk and cost and the Principal or the school shall have no responsibility directly or indirectly of such deal.
- 9) ~~Parents must understand that tuition fees may be raised when the~~
~~increase in fee cannot be challenged in any court of law.~~

Withdrawal

- 1) The intended withdrawal of a pupil should be notified in writing one month in advance or in lieu thereof, fees will be charged till such time the application for school leaving certificate is received by the Principal.
- 2) School leaving certificate will be issued TWO working days after a formal, written application is submitted to the office.
- 3) No Leaving Certificate will be granted until the fees and other dues have been paid.

St. Francis' High School Hayatabad, Peshawar.



FEE CARD

Full

Roll No: 2866..... Class: 4 Lyreen

Name: Muhammad Musa Shah

Address:

Phone Res: Phone Off:


RECEIVED

26

ISLAMIA COLLEGE FOR GIRLS
Islamia College Peshawar

IDENTITY CARD

Name ROMAISA ZAFAR
D/O ZAFAR ALI SHAH
Date of Birth 29-12-2003
Class F.Sc I C.No. 1670
No. 323 **PRINCIPAL**
Islamia College for
Islamia College Pes



Identification Mark MOLE ON LEFT
HAND

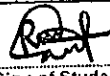
Permanent Address H.No. 477, F/7, St-13
Phase VI Hayatabad, Peshawar.

Blood Group B +ve Tel No: 091-9216456

N.I.C No:

1	7	3	0	1	-	6	0	6	8	8	9	3	-	2
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Date of Issue.....
Valid up to.....


Sig : of Student

ATTESTED

27



FRONTIER'S SCIENCE ACADEMY

HAYATABAD, PESHAWAR

DEGREE COLLEGE FOR GIRLS

Tel: 5813563-5823263

Receipt No: 5174 Date: 24/1/19

Name of Pupil: AFINA PAKH

Father's Name: _____

Class: 8A Admission No: 1662

Period	Rs	Rs
1. Previous Debit		
2. Tuition Fee: June 19/19 - 6950		6950
3. Annual Charges: 2019/19 - 4950		4950
4. Admission Fee		
5. Miscellaneous		
Total		9900

Rupees: _____

Signature: _____

ATTESTED

28

KONTIER'S SCIENCE ACADEMY HAYATABAD PESHAWAR

DEGREE COLLEGE FOR GIRLS

Tel: 5813563-5823263

Receipt No. 3716

Date: 7/3/19

Name of Pupil: ALEENA PUNJ

Father's Name:

Class: 8th

Admission No: 1063875

Period: 1/9 - 31/7/19

	Rs	P
1. Previous Debit		
2. Tuition Fee: April May S.V. 50%	900	
3. Annual Charges: June July 19	490	
4. Admission Fee	1000	
5. Miscellaneous		
Total	2785	

Rupees

Signature


ATTESTED

2-4-19

20-3-19

031785B278

20/3/19

29

NEW ADMISSION

UBL A/C 231098405(Regular Students)

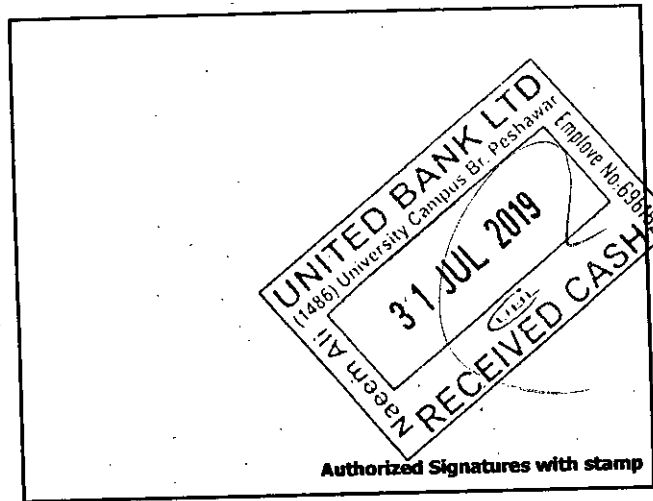
**ISLAMIA COLLEGE UNIVERSITY, PESHAWAR
Pre Medical self**

Student: ROMAISA ZAFAR

Father: MIAN ZAFAR ALI SHAH

Due Date: 31-Jul-19

Fee Due : **Rs.81,000.00**



1001121μ,π, '01

Student Copy

4
ATTESTED

To,
The Secretary
Elementary and Secondary Education,
Government of Khyber Pakhtunkhwa,
Peshawar.

30

Subject: DEPARTMENTAL APPEAL/ REPRESENTATION BEFORE THE APPELLATE AUTHORITY TO ADJUST/ TRANSFER THE APPELLANT ON ANY OTHER LYING VACANT POST BPS-19 OF DISTRICT PESHAWAR OR DISTRICT KHYBER i.e. GOVERNMENT GIRLS HIGH SCHOOL, JAMROD DISTRICT KHYBER.

Respected Sir,

It is stated that I am living at Hayatabad, District Peshawar along with my family, my children are school going and also studying in District Peshawar of different schools of Hayatabad, therefore I am unable to perform my duty in any other out district except District Peshawar or District Khyber i.e. Government Girls High School, Jamrod, District Khyber which is recently lying vacant due to the retirement of Ex-Principal (BPS-19) namely Nafeesa Kousar.

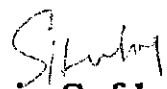
It is, therefore, most humbly requested that on acceptance of this Departmental Appeal/ Representation may kindly be consider for the grievances of the appellant and the appellant may kindly be adjusted/ transferred to


ATTESTED

any other lying vacant post at District Peshawar or Government Girls High School, Jamrod, District Khyber which is recently vacant due to the retirement of Ex-Principal (BPS-19) namely Nafeesa Kousar, for the sake of justice.

Dated: 25/09/2019

Yours Obediently


Mst. Asia Safdar
SS (Home Economics)
BPS-19, Government Girls
Higher Secondary School,
University Town, Peshawar.

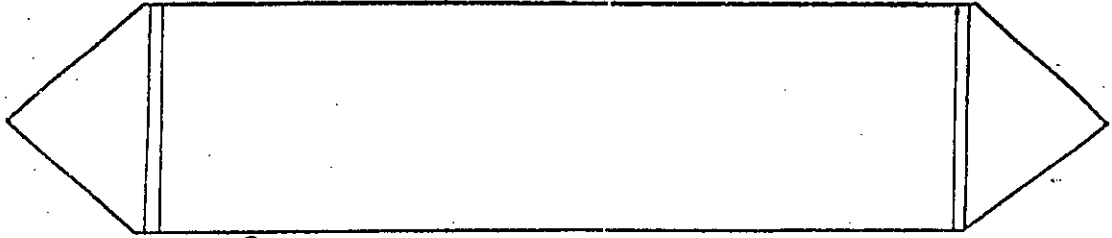
Copy to:

1. P.S to Chief Secretary, Government of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
2. Director Elementary and Secondary Education, Hashtnagri, G.T. Road, Peshawar.
3. District Education Officer (F), Hashtnagri, G.T. Road Peshawar.


ATTESTED

(32)

بعدالت جیسٹیشن سروس ٹریبونل CPK



2019ء منجانب

بنام

موزخہ

مقدمہ

دعویٰ

جرم

باعث تحریر آئیکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ

آن مقام جیسٹیشن سروس ٹریبونل کیلئے

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز

وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور

بسورت ڈگری کرنے اجراء اور صولی چیک و روپیہ عرضی دعویٰ اور درخواست بر قسم کی تصدیق

زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی

نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور

کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ نیا اپنے بجائے تقرر کا اختیار

ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ

پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔

کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی

مذکورہ کریں۔ لہذا وکالت نامہ لکھ دیا کہ مندر ہے۔

المرقوم _____ ماہ _____ سن 2019ء

بمقام ایسٹاڈر کے لئے منظور ہے۔

APPellate / سید (19) S.P.B.S. سیکٹر
صیاح آباد ایسٹاڈر

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

S.A.# 270/2020.

Mst. Asia Sardar, SS (Home Economics), GGHS, University Town Peshawar.....**Appellant.**

VERSUS

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

Written reply on behalf of respondents.

Respectfully Sheweth,

The Respondents submit as under:-

Preliminary Objections

1. The appellant has got no cause of action/locus standi.
2. The instant appeal is pre-mature.
3. The applicant has concealed the material facts from this Hon'able Tribune, hence is liable to be dismissed on this score.
4. The applicant has not come to this Hon'able Tribunal with clean hands.
5. The applicant has filed the instant application with malafide intension just to pressurize the Respondent for gaining illegal service benefits.
6. The present application is liable to be dismissed for mis-joinder & non joinder of necessary parties.
7. The instant application is against the prevailing law & rules.
8. The applicant is stopped by his own conduct to file the instant application.
9. The instant application is not maintainable in its present form and also in the present circumstances of the issue.
11. That this Hon'able Tribunal has got no jurisdiction to entertain the instant service appeal, as the Departmental Appeal has not been filed much before the impugned order.
12. That the applicant is not an aggrieved person under the relevant Article-212 of 1973 Constitution of Pakistan because the appellant filed the instant service appeal against transfer order without maligning the date of transfer order while annex the promotion order dated 18/12/2019.
13. That under Section-10 of Civil Servant Act, the Competent Authority is empowered to transfer a civil servant from one place to another place to meet the exigency of service on administration provided the terms and conditions of services were not adversely affected and the civil servant has no vested right to claim posting or transfer to any particular post at his choice nor he has any right to continue to hold at particular post at a particular place.

FACTS.

1. Para-1 relates to record of the appellant.
2. Para-2 incorrect and denied that BS-17 and above are the provincial cadre post on one hand the appellant want promotion while on the other hand appellant claim posting/ adjustment against her own choice.
3. As stated in forgoing para-2 that BS-19 are provincial cadre and the appellant is liable to serve the department in the said capacity and every civil servant falling under the ambit

Section 2(b) of KP Civil Servant Act, 1973 is legally bound to serve the respondent department to the entire satisfaction of the competent authority.

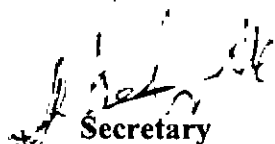
4. That the impugned promotion order issued on 18/12/2019 (Promotion order attached with service appeal at Page- N0. 19) while the appellant filed the departmental appeal on 25/09/2019 (Departmental appeal attached with service appeal at page No. 31). The departmental appeal filed by the appellant much before the impugned promotion order, hence the instant service appeal is not maintainable and liable to be dismissed on this score only.
5. Incorrect and denied. The statement of the appellant against the facts and circumstances, the appellant has not provide any proof of political approach/ political influence.
6. Incorrect. The domicile base policy applicable to the district cadre post i.e. C-IV and PST BS-07 Teacher, there is no such policy for provincial cadre employee, specially BS-19 to be adjusted on domicile base policy.
7. That under Section-10 of Civil Servant Act, the Competent Authority is empowered to transfer a civil servant from one place to another place to meet the exigency of service on administration provided the terms and conditions of services were not adversely affected and the civil servant has no vested right to claim posting or transfer to any particular post at his choice nor he has any right to continue to hold at particular post at a particular place.
8. As already explained in forgoing para-4, that the appellant filed the departmental appeal much before her promotion order under Service Tribunal Act, the instant service appeal is not maintainable.
9. Incorrect and not admitted. The appellant herself confused. The impugned order is not a transfer order, in fact, it is a promotion order and the appellant has been adjust against vacant post at District Nowshera being holding of domicile of District Nowshera.
10. As already explained in forgoing para-6 that for provincial cadre BS-19, no such policy exist to be adjust on domicile base.
11. That the appellant herself admitted that departmental appeal filed on 25/9/2019, while the impugned provincial order passed on 31/12/2019, hence the appeal is liable not to be maintained.
12. That the respondents also seek permission of this Honourable Court to add more grounds and proofs at the hearing of this appeal

GROUND.

- A. Incorrect and not admitted. The appellant has been treated in accordance with law and rules on the subject and no rights of the appellant has been violated.
- B. Incorrect as already explain para above.
- C. Incorrect. According to law and rules as mentioned in this para, accordance to civil servant posting & transfer policy.
- D. The statement of the appellant in this para is false baseless, against the facts and record.

- E. Incorrect and not admitted. The statement of the appellant in this para is false, against the facts and materials on record and against the law, rules on subject, hence denied.
- F. Incorrect as already explained in forgoing para.
- G. Incorrect as already explained in forgoing para.
- H. That the respondents also seek permission of this Honourable Court to add more grounds and proofs at the hearing of this appeal.

In view of the above made submissions, it is, therefore, most humbly prayed that this Honourable Tribunal may very graciously be pleased to dismiss the application.


Secretary
Elementary & Secondary Education Department.