

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. 7710/2021

Date of Institution ... 01.11.2021

Date of Decision ... 17.01.2022

Mst. Shamim Akhter Wazir, Principal (BPS-18) GGHSS Dheri Sydan Mamash Khel  
Bannu. ... (Appellant)

**VERSUS**

The Chief Secretary, Khyber Pakhtunkhwa, Peshawar and four others.  
... (Respondents)

Taimur Ali Khan,  
Advocate ... For appellant

Muhammad Riaz Khan Paindkaheil,  
Assistant Advocate General ... For official respondents No. 1 to 4

Asif Ali Shah,  
Advocate ... For private respondent No. 5

**AHMAD SULTAN TAREEN** ... **CHAIRMAN**  
**ATIQ-UR-REHMAN WAZIR** ... **MEMBER (EXECUTIVE)**

**JUDGMENT**

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

Brief facts of the case are that the appellant was transferred and posted as principal at Government Girls Higher Secondary School Dheri Sydan vide order dated 29-01-2019. The appellant was transferred from the said school to GGHSS Kaki on administrative grounds vide order dated 06-10-2021. Feeling aggrieved, the appellant filed departmental appeal dated 09-10-2021, which was not responded, hence the instant service appeal with prayers that the impugned transfer order dated 06-10-2021 may be set aside and the respondents may be directed not to transfer the appellant on administrative grounds pre-maturely and in violation of posting/transfer policy and circular dated 27-12-2013.

02. Learned counsel for the appellant has contended that the transfer order dated 06-10-2021 is against law, fact and norms of natural justice; that the transfer order is pre-mature and in violation of reported judgment of this honorable Tribunal, Posting/Transfer Policy and circular dated 27-12-2013, therefore not tenable and liable to be set aside; that the appellant was transferred on administrative grounds without specifying the reasons of administrative grounds which is violation of reported judgment 2012 PLC (CS) 187 of this honorable Tribunal, which clearly spells that transfer of a civil servant could not be made on the basis of complaint/administrative ground, as transfer has not been mentioned as punishment in the penalty list in the rules and regulations regarding the conduct of civil servant, therefore, the impugned order is liable to be set aside on this score alone; that the impugned transfer order was passed in violation of transfer/posting policy and circular based on Anita Turab case dated 27-02-2013, therefore the impugned order is liable to be set at naught; that the impugned transfer order is pre-mature as the appellant has not completed her tenure in GGHSS Dheri Sydan; that according to posting/transfer policy, the posting/transfer orders of all the officers up to BSP-19 except the heads of attached departments irrespective of the grade will be notified by the concerned administrative heads with prior approval of the competent authority obtained on a summery, but in case of the appellant, no prior approval of the competent authority was obtained, which is violation of transfer/posting policy.

03. Learned Assistant Advocate General for official respondents No. 1 to 4 has contended that the appellant is a BPS-18 officer from teaching cadre and is not eligible to be appointed/posted against post of BPS-18 of the management cadre/administrative cadre posts; that there are so many complaints against the appellant and the department has a prerogative to take action against the appellant, but taking a lenient view, the appellant transferred from that school to another school against the post of subject specialist; that the appellant is an ill tempered lady, neither parents of the students nor staff of the school is happy

from the unprofessional conduct of the appellant; that the transfer order of the appellant has been passed in accordance with law and no malafide of the respondents is involved in the said transfer; that the transfer order was issued in the best public interest, hence plea of the appellant is devoid of merit and may be dismissed.

04. Learned counsel for private respondent No. 5 mainly relied on the arguments put forth by official respondents with an addition that the appellant belong to teaching cadre, whereas respondent No. 5 belong to management cadre, hence respondent No. 5 was rightly transferred against a management post; that the transfer order has been issued by the competent authority after fulfilling all the codal formalities.

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

06. We have observed that the appellant was transferred on administrative grounds. Learned counsel for official respondents, when confronted with the situation as to what were the administrative grounds, upon which the appellant was transferred, was unable to show any plausible reason or any disciplinary proceedings conducted against her, which shows malafide on part of the respondents and on this score alone, the impugned transfer order is liable to be set aside. The appellant was pre-maturely from one school to another, so the respondents violated Clause-I and IV of the Posting/Transfer 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 tenure of the officer at the place of her posting, hence is illegal, unlawful and not tenable in the eye of law and is liable to be struck down.

07. As a sequel to above discussion, the instant appeal is accepted. The impugned transfer order dated 06-10-2021 is set aside. Parties are left to bear their own costs. File be consigned to record room.

ANNOUNCED

17.01.2022



(AHMAD SULTAN TAREEN)  
CHAIRMAN



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

ORDER

17.01.2022

Learned counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakheil, Assistant Advocate General alongwith Mr. Faizan Section Officer for official respondents No. 1 to 4 present. Learned counsel for private respondent No. 5 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 06-10-2021 is set aside. Parties are left to bear their own costs. File be consigned to record room.

ANNOUNCED

17.01.2022



(AHMAD SULTAN TAREEN)  
CHAIRMAN




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

04.01.2022

Counsel for the appellant and Mr. Kabirullah Khattak, Addl. AG alongwith Faheemullah, SO (Lit) for the respondents present.

Former seeks adjournment in order to further prepare the brief. Request accorded. To come up for arguments on 13.01.2022 before the D.B.


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

  
Chairman

13.01.2022

Appellant in person present. Mr. Muhammad Adeel Butt, Addl. AG alongwith Mr. Faheem Ullah Section Officer for official respondents and private respondent alongwith her counsel present.

Requested for adjournment was made on behalf of both the parties. Adjourned. To come up for arguments before the D.B on 17.01.2022.

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

  
Chairman

within the stipulated time, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 29.11.2021 before the D.B.

Alongwith the memorandum of appeal an application has also been submitted for suspension of the operation of the impugned Notification dated 06.10.2021. Notice of the application be also given to the respondents. The operation of impugned order is suspended till date fixed.



Chairman

29.11.2021 Due to unavailability of DB, the case is adjourned to 10-12-2021.

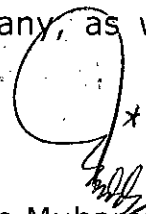


Reader

10.12.2021

Learned counsel for the appellant present. Mr. Noor Zaman Khattak, District Attorney alongwith Syed Nasir-ud-Din Assistant for official respondents No. 1 to 4 and learned counsel for private respondent No. 5 present.

Written replies on behalf of official respondents as well as private respondent submitted, which are placed on file and copies of the same are handed over to learned counsel for the appellant. To come up for rejoinder, if any, as well as arguments on 04.01.2022 before D.B.



(Mian Muhammad)  
Member (E)

**S.A No. 7710/2021**

01.11.2021

Counsel for the appellant present. Preliminary arguments have been heard. The Memorandum of Appeal and copies of the record annexed therewith have been perused.

The appellant is aggrieved from her transfer made vide Notification dated 06.10.2021 on administrative ground. Learned counsel contends that the administrative ground taken in a vague manner does not justify the transfer of a government servant unless he/she is provided the substance of any proceedings/complaint constituting such ground for transfer, and is heard in defence. According to counsel for the appellant, she has not been afforded with opportunity of hearing as to what was the reason constituting the administrative ground for her transfer. Obviously the transfer on administrative ground is a stigma and the order regarding transfer on such ground should reveal certain cogent reasons. The impugned order having been made on administrative ground would need justification which for the time being is not emanating from the impugned order. Unless it is ascertained after hearing the respondents as to the causes existence of such ground, the appellant has got an arguable case for full hearing. The appeal is admitted for regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted

Appellant Deposited  
Security & Process Fee

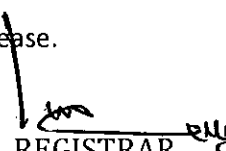

10/11/21



Form- A  
FORM OF ORDER SHEET

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

Case No.- \_\_\_\_\_ 7710 /2021 \_\_\_\_\_

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	01/11/2021	<p>The appeal of Mst. Shamim Akhter Wazir presented today by Mr. Taimur Ali Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-		<p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put up there on <u>01/11/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

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

Case Title: Shamim Akhter Wazir Education Deptt.

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

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

Name:

Taimur Ali Khan

Signature:



Dated:

1/11/2021

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

SERVICE APPEAL NO. 7710 /2021

Shamim Akhtar Wazir

V/S

Education Deptt:

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**INDEX**

S. No.	Documents	Annexure	P. No.
01.	Memo of appeal	-----	01-04
02.	Affidavit		05
03.	Suspension application	-----	06-07
04.	Copies of notification dated 29.01.2019 and appreciation letters	A&B	08-10
05.	Copies of notification dated 06.10.2021 and medical prescription	C&D	11-13
06.	Copy of departmental appeal	E	14
07.	Copies of posting transfer policy and circular dated 27.02.2013	F&G	15-23
08.	Vakalat Nama	-----	24

APPELLANT

THROUGH:

  
(TAIMUR ALI KHAN)  
ADVOCATE HIGH COURT

Bilour plaza, Peshawar cantt:  
Cell # 0333-9390916

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

SERVICE APPEAL NO. 7710 /2021

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 7842

Dated 01-11-2021

Mst. Shamim Akhter Wazir, Principal (BPS-18)  
GGHSS Dheri Sydan Mamash Khel Bannu.

(APPELLANT)

**VERSUS**

1. The Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
2. The Secretary, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. The Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
4. The District Education Officer (Female), Bannu.
5. Mst. Shahida Nasreen, Principal (BPS-18), GGHSS No.2 Bannu City.

(RESPONDENTS)

\*\*\*\*\*

APPEAL UNDER SECTION 4 OF THE SERVICE TRIBUNAL ACT, 1974 AGAINST THE NOTIFICATION DATED 06.10.2021, WHEREBY THE APPELLANT WAS PREMATURELY TRANSFERRED FROM THE POST OF PRINCIPAL GGHSS DHERI SYEDAN MAMASH KHEL BANNU TO GGHSS KAKI BANNU AGAINST THE VACANT POST OF SUBJECT SPECIALIST ON ADMINISTRATIVE GROUNDS AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE PERIOD OF 15 DAYS AS PER POSTING TRANSFER POLICY.

**PRAYER:**

THAT ON THE ACCEPTANCE OF THIS APPEAL, THE IMPUGNED TRANSFER NOTIFICATION DATED 06.10.2021

Filed to-day

Registrar

01/11/2021

MAY KINDLY BE SET ASIDE AND THE RESPONDENT DEPTT: MAY FURTHER PLEASE BE DIRECTED NOT TO TRANSFER THE APPELLANT ON ADMINISTRATIVE GROUNDS PREMATURELY AND IN VIOLATION OF POSTING/TRANSFER POLICY AND CIRCULAR DATED 27.12.2013. ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.

**RESPECTFULLY SHEWETH:**

**FACTS:**

1. That the appellant is working in the respondent department and performing his duty with great devotion and honesty, whatsoever assign to her and no complaint has been filed against her regarding her performance by her superiors.
2. That the appellant was transferred and posted as Principal at GGHSS Dheri Sydan Mamash Khel Bannu vide notification dated 29.01.2019 and since his posting at GGHSS Dheri Sydan Mamash Khel Bannu she is performing her duty with full devotion and trying her outmost for the betterment of the School and in this respect, appreciation letters have also been granted to the appellant for his best performance by his high ups. **(Copies of notification dated 29.01.2019 and appreciation letters are attached as Annexure-A&B)**
3. That the appellant was transferred from GGHSS Dheri Syedan Mamash Khel Bannu to GGHSS Kaki, Bannu against the vacant post of Subject Specialist on administrative ground vide notification dated 06.10.2021 without specifying the reasons on which the appellant was transferred on administrative grounds despite the fact that transfer of a civil servant could not be made on the basis of complaint/ administrative ground because transfer had not been as a punishment in the penalty list in the rules and regulations regarding the conduct of civil servant as per reported judgment **(2012-PLC (CS)-187)** of this Honourable Tribunal. It is pertinent to mention here that the appellant has severe Spinal Cord disorder (Cervical Spondylosis) and under treatment and unbearable for her to travel such long distance. **(Copies of notification dated 06.10.2021 and medical prescription are attached as Annexure-C&D)**
4. That the appellant being aggrieved from the notification dated 06.10.2021 filed departmental appeal with in 7 days as per posting transfer policy on 09.10.2021, but no decision has been taken on his departmental appeal within the stipulated period of time frame of 15

days as per posting transfer policy of the Provincial Government.  
(Copy of departmental appeal is attached as Annexure-E)

5. That the appellant has no other remedy except to file the instant appeal in this august Tribunal for redressal of her grievances on the following grounds amongst the others.

**GROUND:**

- A) That the notifications dated 06.10.2021 is against the law, facts, norms of justice, premature and violation of reported judgment of this Honourable Tribunal, posting transfer policy and circular dated 27.02.2013, therefore, not tenable and liable to be set aside.
- B) That the appellant was transferred from GGHSS Dheri Syedan Mamash Khel Bannu to GGHSS Kaki, Bannu on administrative grounds without specifying the reasons of administrative grounds which is violation of reported judgment (2012-PLC (CS)-187) of this Honourable Tribunal in which the Honourable Tribunal clearly mentioned that transfer of a civil servant could not be made on the basis of complaint/ administrative ground because transfer had not been as a punishment in the penalty list in the rules and regulations regarding the conduct of civil servant as per reported judgment (2012-PLC (CS)-187) of this Honourable Tribunal, therefore the impugned transfer notification dated 06.10.2021 is liable to be set aside on this ground alone.
- C) That the impugned notifications dated 06.10.2021 was passed in violation of posting transfer/policy and circular based on Anita Turab case dated 27.02.2013, therefore, the impugned notification is liable to be set aside. (Copies of posting transfer policy and circular dated 27.02.2013 are attached as Annexure-F&G)
- D) The impugned transfer orders is premature as the appellant has not completed her tenure in GGHSS Dheri Syedan Mamash Khel Bannu, therefore, the impugned transfer order is liable to be set aside.
- E) That the appellant has transferred GGHSS Kaki, Bannu through impugned transfer notification dated 06.10.2021 which is about 40 KM away from the residence of the appellant and she has severe Spinal Cord disorder and under treatment and unbearable for her to travel such long distance, therefore, the impugned transfer notification dated 06.10.2021 is liable to be set aside on medical ground also.

- 5
- F) That in passing of impugned transfer notification, no exigencies or public interest was shown by the respondent, but just to adjust blue eyed person on the post of appellant.
- G) That according to posting/transfer policy, that posting/transfer orders of all the officers up to BS-19 except the Heads of the Attached Departments irrespective of the grade will be notified by the concerned Administrative Departments with the prior approval of the Competent Authority obtained on the Summary, but in the case of the appellant, no prior approval of Summary for transfer was obtained, which is violation of posting/transfer policy.
- H) That the appellant seeks permission to advance others grounds and proofs at the time of hearing.

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

*Shamim*

APPELLANT  
Shamim Akhtar Wazir

THROUGH:

*Shamim Akhtar Wazir*

*(Taimur Ali Khan)*  
ADVOCATE HIGH COURT

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

SERVICE APPEAL NO. \_\_\_\_\_/2021

Shamim Akhtar Wazir

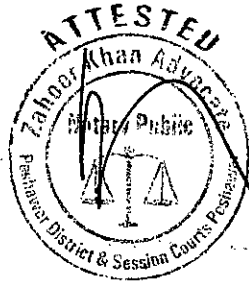
V/S

Education Deptt:

.....

**AFFIDAVIT**

I, Shamim Akhtar Wazir, Principal (BPS-18), GGHSS Dheri Sydan Mamash Khel Bannu, (Appellant) do hereby affirm and declare that the contents of this service appeal are true and correct and nothing has been concealed from this Honourable Tribunal.



*Shamim*  
**DEPONENT**

Shamim Akhtar Wazir  
(APPELLANT)



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR

SERVICE APPEAL NO. \_\_\_\_\_/2021

Shamim Akhtar Wazir

V/S

Education Deptt:

APPLICATION FOR SUSPENDING THE  
OPERATION OF IMPUGNED NOTIFICATION  
DATED 06.10.2021 TILL THE DECISION OF MAIN  
SERVICE APPEAL.

RESPECTFULLY SHEWETH:

- 1) That the appellant has filed an appeal against the notifications dated 06.10.2021, whereby the appellant was transferred from GGHSS Dheri Syedan Mamash Khel Bannu to GGHSS Kaki, Bannu on administrative grounds, along with this application in this august Service Tribunal in which no date is fixed so far.
- 2) That the appellant was transferred from GGHSS Dheri Syedan Mamash Khel Bannu to GGHSS Kaki, Bannu on administrative grounds without specifying the reasons of administrative grounds which is violation of reported judgment (2012-PLC (CS)-187) of this Honourable Tribunal in which the Honourable Tribunal clearly mentioned that transfer of a civil servant could not be made on the basis of complaint/ administrative ground because transfer had not been as a punishment in the penalty list in the rules and regulations regarding the conduct of civil servant as per reported judgment (2012-PLC (CS)-187) of this Honourable Tribunal, therefore, the impugned transfer notification dated 06.10.2021 is liable to be suspended on this ground alone.
- 3) The impugned transfer orders is premature as the appellant has not completed her tenure in GGHSS Dheri Syedan Mamash Khel

Bannu, therefore, the impugned transfer order is liable to be suspended.

- 4) That the appellant has transferred GGHSS Kaki, Bannu through impugned transfer notification dated 06.10.2021 which is about 40 KM away from the residence of the appellant and she has severe Spinal Cord disorder and under treatment and unbearable for her to travel such long distance, therefore, the impugned transfer notification dated 06.10.2021 is liable to be suspended on medical ground also.
- 5) That the appellant has a good prima facie case and all the three ingredients are in favour of the appellant.
- 6) That the grounds of main appeal may also be considered as integral part of this application.

It is therefore most humbly prayed that the operation of the notifications dated 06.10.2021 may kindly be suspended till the decision of main appeal.

*Shamim*

**APPELLANT**  
Shamim Akhtar Wazir

THROUGH:

*(Signature)*  
**(TAIMUR ALI KHAN)**  
**ADVOCATE HIGH COURT**

**AFFIDAVIT**

It is solemnly affirmed that the contents of the application is true and correct to best of my knowledge and belief and nothing has been concealed from this Honourable Service Tribunal.



*Shamim*

**DEPONENT**



**GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT**

Dated Peshawar the January 29, 2019

**NOTIFICATION**

**NO.SO(SF)E&SED/4-16/2018/Posting/Transfer/General:** The Competent Authority is pleased to order posting/transfer of the following officers of E&SE Department on the posts/stations as mentioned against each, in the interest of public service, with immediate effect:

S#	Name, designation & present place	Posted as	Remarks
1	Mst. Shanim Akhtar Wazir, Instructor (BS-18) RITE (Female) Bannu Township	Principal (BS-18) GGHSS Dheri Saidan Bannu	V.S#2
2	Mst. Shahida Nasrin, Principal (BS- 18) GGHSS Dheri Saidan Bannu	SS (BS-18) GGHSS No.2 Ghalla Mandi Bannu	A.V.P

2. No TA/DA is allowed.

Enclt. of even No. & Date.

**SECRETARY**

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar
3. District Education Officers (F), Concerned.
4. District Accounts Officers, Concerned.
5. PS to Advisor to CM for E&SE Department, Khyber Pakhtunkhwa.
6. PS to Secretary E&SE Department, Khyber Pakhtunkhwa.
7. PS to Special Secretary E&SE Department, Khyber Pakhtunkhwa.
8. Incharge EMIS E&SE Department.
9. Officers concerned.
10. Master file.

  
(SHABIR KHAN)  
SECTION OFFICER (SCHOOLS FEMALE)

**ATTACHED**

B (9)

I visited the office of the principal of this school and discussed different issues and achievements. I believe the principal is a hardworking and brave lady who is facing all the challenges with a great courage. I hope she would contribute more to our society and will be an asset to any institutions that she would join.

~~Wahid~~  
Shamrat Ali  
AC-1 BNU  
05/Mar/2020.

ATTESTED

Today 14-07-2020, I visited the school. The principal of the school seems to be very professional and hard working. She has great attachment towards the official duty. However, she should perform her duty while keeping herself in official limit like arrangement of fund.

The maintenance of official record and file is up to the mark. As a head, she is facing many challenges. DPO (Female) should resolve her problems/issues at once.

At DPO

*[Signature]*

HDC (FED)

*[Signature]*



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

Dated Peshawar the October 06<sup>th</sup>, 2021

**NOTIFICATION**

**NO. SO(SF)E&SED/4-16/Posting/Transfer/2021 (TC):** The Competent Authority is pleased to order the posting / transfer of the following officers of Elementary & Secondary Education Department Khyber Pakhtunkhwa (on administrative grounds), in the best public interest with immediate effect: -

Sr. No	Name & designation	From	To
1.	Mst. Shamim Akhtar Wazir Subject Specialist Islamyat (BS-18)	Principal GGHSS Dheri Syedan Mamash Khel Bannu.	GGHSS Kaki Bannu, against the vacant post of Subject Specialist Islamyat (BS-18).
2.	Mst. Shahida Nasreen Principal (BS-18)	GGHSS No-2 Bannu City.	Principal GGHSS Dheri Syedan Mamash Khel Bannu (vice No-1).

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT

**Endst: of even No & date**

Cc to the: -

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

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

To

The Secretary,  
Elementary & Secondary Education,  
Govt: Khyber Pakhtunkhwa, Peshawar.

E-14

**SUBJECT: APPEAL REGARDING TRANSFER.**

Respected Sir,

With utmost reverence it is stated that I have joined GGHS Dheri Saidan Mamash Khel Bannu with very worst condition with other serious matters like bogus mutation, thefts of auction material of school etc. After joining I struggle day and night to make this institution a bright place for learning education, and Alhamdulillah the Deputy Commissioner Bannu awarded excellent Principal award as well as Clean & Green School award to this institution, also received best performance award by the District Monitoring Officer EMA Bannu.

Couple of months ago my one son name Mr. Usman was drowned in Ping Dam Bannu and died during this incident that make me so hurt, my one son and one daughter is studding in Peshawar. Keeping in view my family condition. I wrote two appeals vide Letter No: 988-90, dated 22/09/2021 & Letter No: 999-1001, Dated. 07/10/2021 to DEO (F) Bannu for the transfer to Peshawar and request her to give me a Covering Letter so that I approach to worthy Secretary for transfer myself to Peshawar (Copies attached) and if it is not possible then remains me in this school till when I transfer myself to Peshawar.

But sir, I shocked last day to see my transfer on administration ground to a school as SS. That was shocking for me. Sir I was applied for the transfer to anywhere in Peshawar because I am suffering savior conditions of spinal cord disorders and in this situation a 40 KM traveling is unbearable to me. Sir from the date of joining (w.e.f 01/02/2019) I acknowledge this institution as my home and did all my best efforts for this institution, there is no complaint enquiry recommendation against me so that my transfer made on administration ground.

Therefore, it is a very kind request to you that keeping in view my family condition kindly cancel this order on humanitarian ground till my adjustment in Peshawar. Because my husband is too a Government servant and we will both suffer problems due to this transfer. The applicant will be highly thankful for this act of humanitarian decision and act of kindness.

Date: 09/10/2021.

Yours Obediently,

*Shamim*  
Mst. Shamim Akhter Wazir  
Principal GGHS Dheri Saidan  
Bannu.

SHAMIM AKHTER WAZIR  
Principal GGHS Dheri Saidan  
Bannu

3043  
11/12

Today 14-07-2020, I visited the school. The principal of the school seems to be very professional and hard working. She has great attachment towards the official duty. However, she should perform her duty while keeping herself in official limit like arrangement of fund.

The maintenance of official record and file is up to the mark.

As a head, she is facing many challenges. DDO (Female) should

resolve her problems/issues at once.

At DDO

*[Signature]*

HDC (FED)

20/07/20





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

Dated Peshawar the October 06<sup>th</sup>, 2021

**NOTIFICATION**

**NO. SO(SF)E&SED/4-16/Posting/Transfer/2021 (TC):** The Competent Authority is pleased to order the posting / transfer of the following officers of Elementary & Secondary Education Department Khyber Pakhtunkhwa (on administrative grounds), in the best public interest with immediate effect: -

Sr. No	Name & designation	From	To
1.	Mst. Shamim Akhtar Wazir Subject Specialist Islamyat (BS-18)	Principal GGHS Dheri Syedan Mamash Khel Bannu.	GGHS Kaki Bannu, against the vacant post of Subject Specialist Islamyat (BS-18).
2.	Mst. Shahida Nasreen Principal (BS-18)	GGHS No-2 Bannu City.	Principal GGHS Dheri Syedan Mamash Khel Bannu (vice No-1).

SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT

**Endst: of even No & date**

Cc to the: -

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

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

D (12)




**PRIME TEACHING HOSPITAL**  
Warsak Road Peshawar

Tel: 091-5200663-4

**Prof. Mumtaz Ali**  
MBBS, FCPS (Neuro), ESDC (France)  
Professor of Neuro Surgery  
Prime Teaching Hospital  
Peshawar Medical College

Name: Shamim Bibi Age: 45Yrs Sex: F Address: Peshawar Weight: kg Date: 22-09-21

MRN: 2021-09-49014 

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Prof. Mumtaz Ali  
MBBS, FCPS (Neuro)  
ESDC (France), Neuro Surgeon  
Prime Teaching Hospital  
Peshawar Medical College

VIC





# PRIME TEACHING HOSPITAL

Warsak Road Peshawar

Tel: 091-5200663-4

## DIAGNOSTIC SERVICES

MRN 2021-09-49014 Specimen Serum  
Name Shamim Bilal Lab No 201778  
Gender F Age 45yrs  
Ref. By Prof. Dr. Muntaz Ali Shah Date 22/09/2021 12:41:18

TEST RESULT UNITS NORMAL RANGE

### Special Chemistry

T3	2.24	nmol/l	1.30 - 3.10
T4	9.35	ug/dl	5.13 - 14.05
TSH	1.24	uIU/ml	0.270 - 4.20

Test is performed on state of the Art Roche Cobas e111 by Chemiluminescence Technology (CLT)

APPROVED

To

The Secretary,  
Elementary & Secondary Education,  
Govt. Khyber Pakhtunkhwa, Peshawar.

E 14

**SUBJECT: APPEAL REGARDING TRANSFER.**

Respected Sir,

With utmost reverence it is stated that I have joined GGHSS Dheri Saidan Mamash Khel Bannu with very worst condition with other serious matters like bogus mutation, thefts of auction material of school etc. After joining I struggle day and night to make this institution a bright place for learning education, and Alhamdulillah the Deputy Commissioner Bannu awarded excellent Principal award as well as Clean & Green School award to this institution, also received best performance award by the District Monitoring Officer EMA Bannu.

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Therefore, it is a very kind request to you that keeping in view my family condition kindly cancel this order on humanitarian ground till my adjustment in Peshawar. Because my husband is too a Government servant and we will both suffer problems due to this transfer. The applicant will be highly thankful for this act of humanitarian decision and act of kindness.

Date: 09/10/2021.

*(Handwritten signature)*

Yours Obediently,

*Shamim*  
Mst. Shamim Akhter Wazir  
Principal GGHSS Dheri Saidan  
Bannu.

SHAMIM AKHTER WAZIR  
Principal GGHSS Dheri Saidan  
Bannu

3043  
11/10



Posting - Transfer Policy - updated till 10 Jan, 2005

- viii) No posting/transfers of the officer's/officials on detailment basis shall be made.
- ix) Regarding the posting of husband/wife, both in Provincial services, efforts where possible would be made to post such persons at one station subject to the public interest.
- x) All the posting/transferring authorities may facilitate the posting/transfer of the unmarried female government Servants at the station of the residence of their parents.
- xi) Officers/officials except DCOs and DPOs/SPs who are due to retire within one year may be posted on their option on posts in the Districts of their domicile and be allowed to serve there till the retirement  
 DCOs and DPOs who are due to retire in the near future may also be posted in the District of their domicile subject to the condition that such posting would be against non-administrative posts of equivalent scales;
- xii) In terms of Rule-17(1) and (2) read with Schedule-III of the NWFP Government Rules of Business 1985, transfer of officers shown in column 1 of the following table shall be made by the authorities shown against each officer in column 2 thereof:

Outside the Secretariat		
1.	Officers of the all Pakistan Unified Group i.e. DMG, PSP including Provincial Police Officers in BPS-18 and above.	Chief Secretary in consultation with Establishment Department and Department concerned with the approval of the Chief Minister.
2.	Other officers in BPS-17 and above to be posted against scheduled posts, or posts normally held by the APUG, PCS(EG) and PCS(SG).	-do-
3.	Heads of Attached Departments and other Officers in B-19 & above in all the Departments.	-do-
In the Secretariat		
1.	Secretaries	Chief Secretary with the approval of the Chief Minister.
2.	Other Officers of and above the rank of Section Officers: a) Within the Same Department b) Within the Secretariat from one Department to another.	Secretary of the Department concerned. Chief secretary/Secretary Establishment.
3.	Officials up to the rank of Superintendent:	

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

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ATTESTED

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Posting - Transfer Policy - updated till 10 Jan, 2009

a) Within the same Department	Secretary of the Department concerned.
b) To and from an Attached Department	Secretary of the Dept in consultation with Head of Attached Department concerned.
c) Within the Secretariat from one Department to another	Secretary (Establishment)

xiii) While considering posting/transfer proposals all the concerned authorities shall keep in mind the following:

- a) To ensure the posting of proper persons on proper posts, the Performance Evaluation Report/annual confidential reports, past and present record of service, performance on post held presently and in the past and general reputation with focus on the integrity of the concerned officers/officials be considered.
- b) Tenure on present post shall also be taken into consideration and the posting/transfers shall be in the best public interest.

xiv) Government servants including District Govt. employees feeling aggrieved due to the orders of posting/transfer authorities may seek remedy from the next higher authority/ the appointing authority as the case may be through an appeal to be submitted within seven days of the receipt of such orders. Such appeal shall be disposed of within fifteen days. The option of appeal against posting/ transfer orders could be exercised only in the following cases.

- i) Pre-mature posing/transfer or posting transfer in violation of the provisions of this policy.
- ii) Serious and grave personal (humanitarian) grounds.

2. To streamline the postings/transfers in the District Government and to remove any irritant/confusions in this regard the provision of Rule 25 of the North West Frontier Province District Government Rules of Business 2001 read with schedule - IV thereof is referred. As per schedule-IV the posting/transferring authorities for the officers/officials shown against each are as under:-

S. No.	Officers	Authority
1.	Posting of District Coordination Officer and Executive District Officer in a District.	Provincial Government.
2.	Posting of District Police Officer.	Provincial Government
3.	Other Officers in BPS-17 and above posted in the District.	Provincial Government
4.	Official in BPS-16 and below	Executive District Officer in consultation with District Coordination Officer.

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[Signature]

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.

SPECIMEN NOTIFICATION.

GOVERNMENT OF NWFP  
NAME OF ADMINISTRATIVE  
DEPARTMENT

Dated Peshawar, \_\_\_\_\_

NOTIFICATION

NO. \_\_\_\_\_ The Competent Authority is pleased to order the transfer of Mr. \_\_\_\_\_ Department and to post him as \_\_\_\_\_ in the interest of public service, with immediate effect.

CHIEF SECRETARY  
GOVERNMENT OF NWFP

Encl. No. and date even.  
Copy forwarded

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

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5.

(NAME)  
SECTION OFFICER  
Administrative Department

(Authority: Letter No. SO (E-I) E&AD/3-12/2006 dated 22-12-2006).

The competent authority has been pleased to direct that Para 1(v) of the Posting/Transfer Policy contained in this Department letter No:SOR-I (E&AD) 1-1/85 Vol-II, dated 15-2-2003 shall stand deleted, with immediate effect, consequently allowing the authorities, competent under the NWFP Government Rules of Business, 1985 and the District Government Rules of Business, 2001 or any other rules for the time being in force, to make posting/transfers of Government servants, any time during the year, in genuinely deserving and necessary cases, in public interest, subject to strict observance of all other provisions of posting/transfer policy contained and notified vide circular letter under reference. Hence there will be no ban on posting/transfer of Government Servants in any part of the year while carrying out postings/transfers of Government Servants.

The authorities concerned will ensure that no injustice whatsoever is caused to any civil servant, public work is not suffered and service delivery is improved.

I am therefore directed to request that the provisions of posting/transfer policy, as amended to the extent above, may kindly be followed in letter and spirit in future so as to keep good governance standard in this regard.  
(Authority: Letter No: SOR-VI (E&AD) 1-1/2008/Vol-VI, dated 3-6-2008).

.....  
According to the policy of the provincial Government, maximum tenure on a post is three years. Contrary to the Policy, Store Keepers, Cashiers, Accountants and other ministerial staff remains posted in their particular field for long time, which may result in misuse of this position, due to which not only public exchequer may sustain loss but general public also suffers. The Provincial Government has taken serious notice of this situation & decided that all Administrative Secretaries and DCOs may submit a certificate within one month to the effect that above mentioned officials, having completed three years on their posts, have been adjusted on posts other than those they held previously.  
(Authority: Urdu circular No: SOR-VI (E&AD)/05 dated 28<sup>th</sup> Oct, 2005.)  
.....

The Chief Minister NWFP has directed that:-

- i) Submission of summary would not be required in case of mutual transfer.
- ii) Posting/transfer shall be made according to the policy;
- iii) Government Servants shall avoid direct submission of applications to the Chief Minister;
- iv) In genuinely deserving case, they should approach the Administrative Secretaries who could process the case according to policy;

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- v) In case of direct submission of application to the Chief Minister Secretariat for Posting/ Transfer, the concerned govt servants shall be proceeded against under the prevalent rules and regulations.

{Authority: Urdu circular No: SOR-VI/E&AD/1-4/2003, dated 86-2004.  
Urdu Letter No: SOR-VI/E&AD/Misc: /2005, dated 3-1-2005.}

It has been decided with the approval of the competent authority that:-

- i) Mutual transfer would be allowed if both the concerned employees agree; except the Government Servants holding Administrative posts;
- ii) NWFP Government Rules of Business 1985 shall be observed while issuing posting/transfer orders.

{Authority: - Urdu circular letter No: SOR (E&AD)/1-4/2005, dated 9-9-2005}

.....

The competent authority has decided that in order to maintain discipline, enhance performance of the departments and ensure optimum service delivery to the masses, the approved /prevalent policy of the posting/transfer shall be strictly followed. Government Servants violating the policy and the NWFP Govt Servants (Conduct) Rules 1987 shall be proceeded against under the NWFP Removal from Service (Special Powers) Ordinance 2000. As required under the NWFP Govt Rules of Business 1985, the Administrative Secretaries shall ensure compliance with the policy and defaulting offices/officials be taken to task & entries to this effect shall be made in their PERs/ACRs. In case subordinate officers are working on sites or proceeding for the purpose of inspection, they shall submit inspection Report to their Administrative Secretaries. Administrative Secretaries shall ensure submission of such reports.

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

.....

#### PLACEMENT POLICY.

In order to utilize the expertise of the officers who have received foreign training in various fields, the provincial Government has decided to adopt the Placement Policy, approved by the Prime Minister of Pakistan, and make it a part of its Posting/Transfer Policy. Placement Policy as follows:-

- i) All placements would be made on the basis of merit and keeping in view the needs of the organization.
- ii) The first priority in placement must go the parent organization of the participant from where the individual had applied. This will be in consonance with the concept of establishing the "Need" for the department and fulfilling the need through "capacity building for the organization.
- iii) In order to follow the "bottom up approach" for Devolution, the priority within departments must go to the Districts, the Provinces and than the Federal Government.
- iv) The second priority in placement should go to up-grading the existing training Institution within the country. The knowledge gained by the

Placement Policy has been made part of the posting/transfer policy vide Urdu circular No SOR-VI(E&AD)1-4/06, dt 9-2-2007

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(2)

officers, will be of immense value to bring about a qualitative change in the training institutions. The following proposals are made in this regard:

- a) Permanent posting of an officer to the training institutions for 2-3 years;
- b) Temporary attachment with the training intuitions for 3 to 6 months for some research project on helping in developing case studies;
- c) Earmarked as a visiting faculty member for specific subject.
- v) Individuals posted to their parent organizations will also organize training for their subordinates within the department, in order to transfer the knowledge and bring about a qualitative change internally;
- vi) The Normal tenure of posting as already provided in the policy would be ensured;
- vii) No participant should be allowed to be posted on deputation to multinational donor agencies for at least 5 years;
- viii) No participant will decline/represent against his/her posting.

\*\*\*\*\*

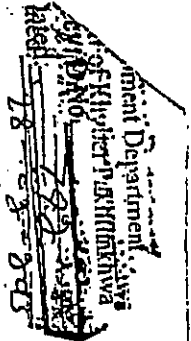
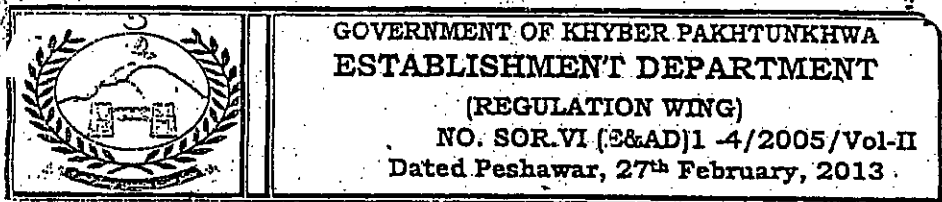
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To  
2/2/13

1. The Additional Chief Secretary (P&D) Khyber Pakhtunkhwa.
2. The Additional Chief Secretary (FATA) Khyber Pakhtunkhwa.
3. All Administrative Secretaries to Govt. of Khyber Pakhtunkhwa.
4. All Commissioners in Khyber Pakhtunkhwa.

Subject: CONSTITUTION PETITION NO.23 OF 2012 OUT OF SUO MOTO CASE NO. 3/2012 (PETITION BY MS. ANITA TURAB FOR PROTECTION OF CIVIL SERVANTS REGISTERED UNDER ARTICLE 184 (3) OF THE CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN 1973.)

Sir,

I am directed to refer to the subject noted above and to state that the Supreme Court of Pakistan vide the subject cited judgment has pronounced the following principles of Law with regard to protection and conduct of civil servants.

(i) **Appointments, Removals and Promotions:** Appointments, removals and promotions must be made in accordance with the law and the rules made thereunder, where no such law or rule exists and the matter has been left to discretion, such discretion must be exercised in a structured, transparent and reasonable manner and in the public interest.

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(ii) **Tenure, Posting and Transfer:** When the ordinary tenure for a posting has been specified in the law or rules made thereunder, such tenure must be respected and cannot be varied, except for compelling reasons, which should be recorded in writing and are judicially reviewable.

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(iii) **Illegal Orders:** Civil Servants owe their first and foremost allegiance to the law and the constitution. They are not bound to obey orders from superiors which are illegal or are not in accordance with accepted practices and rule based norms; instead, in such situations, they must record their opinion and, if necessary, dissent.

(iv) **OSD:** Officers should not be posted as OSD except for compelling reasons, which must be recorded in writing. If at all an officer is to be posted as OSD, such posting should not exceed 03 months. If there is a disciplinary inquiry going against him/her such inquiry must be completed at the earliest. The officer on special duty may be posted against a post of his/her equivalent pay scale/grade within 03 months of his/her order as OSD.

2. I am, therefore, directed to request you to note the above principles of law for strict compliance.

Yours faithfully,

*NAJAM*

(NAJ-MJS-SAHAR)  
SECTION OFFICER (REG-VI)

Encl: as above.

A copy is forwarded to:-

1. The Principal Secretary to Governor, Khyber Pakhtunkhwa.
2. The Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
3. The Secretary Provincial Assembly, Khyber Pakhtunkhwa.
4. The Accountant General, Khyber Pakhtunkhwa.
5. The Registrar, Peshawar High Court, Peshwar.
6. The Secretary Khyber Pakhtunkhwa, Public Service Commission.
7. All Addl: Secretaries Establishment & Administration Department.
8. All Deputy Secretaries in Establishment & Administration Department.

*NAJAM*

SECTION OFFICER (REG-VI)

*[Handwritten signature]*

بعد الت

سول سٹریٹجی کونسل ایسٹوار

تسليم افتخوری / 2 پنجاب  
شکیم افتخوری / 1  
مقررہ نام

مورخہ  
مقدمہ  
دعوی  
جم

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ  
آن مقام لیسٹوار کیلئے  
مقرر کر کے اقرار کیا جاتا ہے کہ صاحب مہسوف کو مقدمہ کی نکل کاروائی کا کمال اختیار ہوگا۔ نیز  
وکیل صاحب کو راشی نامہ کرنے و اقرار ثالث و فیصلہ پر حلف دینے جو اب دہی اور اقبال دعویٰ اور  
بصورت ڈگری کرنے اجراء اور وصولی چیک دروپیہ اور عرصی دعویٰ اور درخواست ہر قسم کی تصدیق  
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی بڑائی  
اور مفوضی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت  
مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے  
تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے  
اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانبہ التوائے مقدمہ کے  
سب سے وہوگا کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں  
گے کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھنیا کہ بند رہے۔

Accepted  
&  
Attested  
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المرقوم

کے لئے منظور ہے۔

Shawin

مقام

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

**Service Appeal No. 7710/2021**

Mst, Shamim Akhtar Wazir Principal BS-18.....**Appellant**

**VERSUS**

1. Chief Secretary Khyber Pakhtunkhwa Peshawar,

2. Secretary E&SE Department.....**Respondents.**

**JOINT PARAWISE COMMENTS FOR & ON BEHALF OF THE RESPONDENTS NO. 1 TO 04.**

**Respectfully Sheweth,**

**Preliminary Objections**

1. That the appellant has got no cause of action to file the instant appeal.
2. That Appellant is estopped by his own conduct to approach this Hon'able Tribunal.
3. 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.
4. That the instant appeal is based on mala-fide intention just to put pressure on the Respondents for the grant of illegal and even unauthorized service benefits.
5. The present appeal has been filed to entangle the Department unnecessarily in litigation and to waste the precious time of the respondents as well as of this Hon'able Tribunal.
6. That the present appeal is against the relevant provision of law and rules.
7. That in the instant Service Appeal the Appellant has suppressed material facts from this Honorable Tribunal which are sin-qua-non for the just and fair disposal of the case.
8. The appeal of the appellant is time barred.

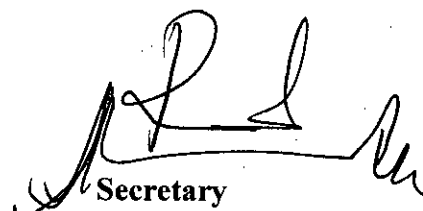
**REPLY ON FACTS.**

1. Pertains to record.
2. That each and every civil servant falling under the ambit section-10 of KPK, Civil Servant Act 1973, the rest of Para pertains to record.
3. Incorrect, transfer order of the appellant according to law & rules.
4. That the department appeal having no weightage, hence filed on the ground. The notification dated 06.10.2021 is in accordance with the provision of Section 10 of Civil Servant Act, 1973. There is no law to reply on departmental appellant to appellant in 07 days.
5. That the appellant is not an aggrieved person, hence the instant Service appeal may be dismissed inter alia on the following ground.

**REPLY ON GROUNDS**

- A. Incorrect and denied, the impugned Notification dated 06-10-2021 of the Respondents within legal sphere and is liable to be maintained in favour of the Respondent Department in the interest of justice and under the mandatory provisions of Section 10 of KPK, Civil Servant Act, 1973.
- B. Incorrect and not admitted. The stance of the appellant is illegal as the post of the principal BS-18 is purely a Provincial Cadre post in the Respondent Department and the appellant has been treated as per law & rules vide Notification and Order dated 06-10-2021 by the Respondent Department due to Administrative / Public Interest order annex for kind perusal, please.
- C. Incorrect and not admitted. The stance of the appellant is illegal as the post of the principal BS-18 is purely a Provincial Cadre post in the Respondent Department and the appellant has been adjusted in District Bannu and also discuss in Para A of reply.
- D. Incorrect & not admitted. The appellant transfer under section-10 of Civil Servant Act, 1973 in public interest.
- E. Incorrect & not admitted. The plea of the appellant is illegal on the grounds that the Notification dated 6-10-2021 of the Respondent is in accordance with the provision of Section 10 of Civil Servant Act, 1973. As the post of the appellant is a Provincial Cadre in the Respondent Department having no question or tenure completion and U/C based posting, hence the stance of the appellant is illegal. That the appellant has right/option to retire on medical grounds if she cannot perform her duties up to the entire satisfactions of the high-ups.
- F. That the Competent Authority by exercise his power vested him under law, transfer the appellant in the best interest of public..
- G. In correct in light of elementary and secondary education department issued on dated 26-07-2013 that posting and transfer of the officer BPS 18 may be made at the level of the department concerned and consultation with the minster in charge.
- H. However, the Respondents also seek leave of this Honorable Tribunal to submit additional grounds, case law and record at time of argument 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 instant service appeal with cost in favour of the Respondents in the interest of justice.**

  
Secretary  
E&SE Department.  
Respondent No. 1 to 04

①

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

Appeal No. 7710/2021

**Shamim Akhtar Wazir**.....Appellant

VERSUS

**Chief Secretary of Khyber Pakhtunkhwa & others**  
.....Respondents

WRITTEN REPLY ON BEHALF OF  
RESPONDENT NO. 5

**Respectfully Sheweth:**

**Preliminary Objections:**

1. That the appellant has got no cause of action to file the instant appeal.
2. That the appellant has not come to this Hon'ble Tribunal with clean hands.
3. That with due respects this Hon'ble Tribunal lacks jurisdiction to entertain the instant appeal.
4. That the petition is bad in law and facts.
5. That the appellant concealed the material facts from this Hon'ble Tribunal.
6. That the Respondent No.5 has already assumed charge of her duties but the appellant forcibly not allowing the innocent applicant for performing her lawful duty, hence, this is based on wrong facts and liable to be dismissed.
7. That there are so many complaints from the locality against the appellant because she



has no experience of administration as a principal of high school and any other institution, she is an ill-tempered lady neither the parents of the students nor the staff is happy from the unprofessional conduct / attitude of appellant.

8. That the appellant is BPS-18 officer from Teaching Cadre and is not eligible to be appointed / posted against a post of BPS-18 of the Management Cadre / Administrative Cadre posts. There are so many complaints from the parents as well as from the staff against the appellant and the department has a prerogative to take action against the appellant but the transfer Order is the subject matter of the appeal is lawful and issued in the best Public interest.
9. That the appellant is estopped by her own conduct.
10. The transfer order has been issued by worthy secretary education department and against that order no appeal has been made to the high ups, the appeal of the appellant is premature and liable to be dismissed on this score only.

**ON FACTS:-**

1. In reply to para 1 of the appeal it is submitted that the appellant is working in respondents department as subject specialist and posted against wrong post. There are so many complaints from the locality against the appellant because she has no experience of administration as a principal of high school and any other

3

institution, she is an ill tempered lady neither the parents of the students nor the staff is happy from the unprofessional conduct / attitude of appellant.

2. Para No.2 of the appeal is correct to this extent that appellant was transferred to GGHSS Dheri Sydan Mamash Khel Bannu and rest of the para is misleading. No appreciation letter has been issued from the education department i.e DEO, Director Education or Secretary Education. The letters attached with appeal are self made.
3. Para No.3 of the appeal is framed with the intention to misguide and mislead this Hon'ble Tribunal because that initially the appellant was appointed as Subject Specialist (Islamiat) BPS-17 and promoted in the same cadre while on the other hand the replying respondent No.5 is appointed as Headmistress in BPS-17 and promoted as Principal BS-18 in the same cadre. After promotion the Respondent No.5 was posted as Principal in GGHSS Dheri Sydan and served for only 02 & 02 months and then transferred to GGHSS No.2 Ghalla Mandi Bannu vide Order dated:29.01.2019 against wrong post of Subject Specialist and the Appellant (subject specialist) was adjusted against the post of Respondent No.5 wrongly, illegally with the help of political figures. The matter was agitated by the innocent Respondent on departmental forum but no positive response. That the appellant BPS-18

(4)

officer from Teaching Cadre and is not eligible to be appointed / posted against a post of BPS-18 of the Management Cadre / Administrative Cadre posts. There are so many complaints from the parents as well as from the staff against the appellant and the department has a prerogative to take action against the appellant but the transfer Order is the subject matter of the appeal is lawful and issued in the best Public interest. (copies of appeal, application & complaints against appellant are attached)

Further it is submitted that prescription attached with the appeal is fake, forged and factious because the appellant has not been examined in any Government Hospital nor the ailment referred in the prescription is not a serious illness and now a days everyone is suffering from such like diseases.

4. Para No.4 of the appeal is wrong and incorrect. The transfer order has been issued by worthy secretary education department and against that order no appeal has been made to the high ups, the appeal of the appellant is premature and liable to be dismissed on this score only.
5. Para No.5 is wrong and incorrect that the appellant has no cause of action to file the instant appeal.

**GROUNDS:-**

5

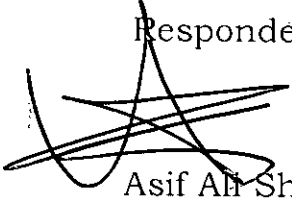
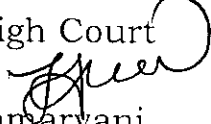
- A. Ground A is denied. The transfer order dated:06.10.2021 of the answering respondent has been passed under the law and the rules and the allegations leveled in this para are false and baseless.
- B. Ground B is denied. The appellant is subject specialist and due to her wrong post in the year 2019 till date the precious time of the students are destroyed and now the others are at stake because appellant is basically is a teacher and holding a wrong post of Principal of GGHSS at Dheri Sydan. The transfer order has been issued by the competent authority as per law in best public interest. The public interest is sole purpose of the transfer order so there is no illegality or irregularity in the transfer Notification dated:06.10,2021.
- C. Grounds C & D are denied. The appellant is obliged under the civil servants Act, 1973 to serve anywhere as and when required. More so the appellant is not eligible on any score for the post of Principal.
- D. Ground E is denied. The stance taken in this para is self denying for the reason that in the alleged test and prescription nowhere it is mentioned that the appellant is serious and she cannot travel and such like minor disease are common in female after 45 years of age.

(6)

- E. Ground F is incorrect, hence denied. The appellant is not eligible for the post as submitted earlier and the answering respondent has been transferred and posted in accordance with the law being eligible for the said post.
- F. Ground G is denied as well. The Transfer notification has been issued after adopting all the codal formalities and ground is framed with mala fide intention to mislead this Hon'ble Tribunal. The appellant has brought no malafide on record except bald allegations.
- G. In reply to ground H, it is submitted that the answering respondent too seeks leave of this Hon'ble Tribunal to adduce additional arguments / documents at the time of hearing of the instant appeal .

**IT IS. THEREFORE, MOST HUMBLY  
PRAYED THAT THE APPEAL BEING  
WITHOUT ANY SUBSTANCE MAY KINDLY  
BE DISMISSED WITH COSTS.**

Dated:29.11.2021

Respondent No. 5  
Through  
  
Asif Ali Shah  
Advocate High Court  
&   
Haseen Ullah Gamaryani  
Advocate High Court

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

Appeal No. 7710/2021

**Shamim Akhtar Wazir**.....Appellant

VERSUS

**Chief Secretary of Khyber Pakhtunkhwa & others**  
.....Respondents

**Application for Vacation of the order of  
suspension dated 01.11.2021**

Respectfully Sheweth.

1. That this Hon'ble Tribunal while hearing the above titled appeal on 01.11.2021 was pleased to order status quo / suspension of Transfer Notification dated:06.10.2021 in the case.
2. That the appellant while concealing material facts regarding relieving the charge and assumption of duties by the applicant/ answering respondent No.5 filed an application for suspension of the impugned transfer order and this Hon'ble Tribunal was pleased to pass a status quo / suspension order dated:01.11.2021.
3. That the respondent No. 2 to 4 issued so many letters due to non compliance of official order and the respondent No.5 was hanged because the appellant wrongly occupied the post of Principal at GGHSS at Dheri Syedan and not allowing the Respondent No.5 for performing the duties and after the Order of this Hon'ble Court the Principal from where the respondent No.5 has been transferred is also no allowing her. The salary has been stopped of the respondent No.5 and

8

inconvenienced due to the Order dated: 01.11.2021 of this Hon'ble Tribunal if the Order is vacated there is no inconvenience to the appellant.

4. That the Respondent No.5 has already assumed charge of her duties but the appellant forcibly not allowing the innocent applicant for performing her lawful duty, hence, this application.
5. That balance of convenience lies in favour of the applicant.
6. That the applicant has got a good prima facie case in her favour and hopeful of its success.
7. That irreparable loss is being caused to the applicant due to the interim order passed by this Hon'ble Tribunal.

It is therefore most humbly prayed that the order dated:01.11.2021 may kindly be withdrawn and the applicant may kindly allowed to perform her duties till final disposal of the above titled appeal.

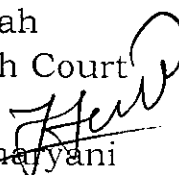
Dated:29.11.2021

Respondent No. 5

Through  


Asif Ali Shah  
Advocate High Court

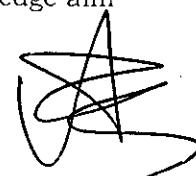
&

  
Haseen Ullah Gamaryani  
Advocate High Court

### AFFIDAVIT

I. Shahida Nasreen, Principal BPS-18 (Respondent No.5 do hereby solemnly affirm and declare on Oath that contents of this applicaiton are true and correct to the best of my knowledge ami nothing has been concealed from this Hon'ble Tribunal.

DEPONENT

  
As per instruction of my  
Client .)

9

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

Appeal No. 7710/2021

**Shamim Akhtar Wazir**.....Appellant

VERSUS

**Chief Secretary of Khyber Pakhtunkhwa & others**  
.....Respondents

REPLY ON BEHALF OF RESPONDENT NO.5  
to APPLICATION FOR THE GRANT OF  
SUSPENSION ORDER.

Respectfully Sheweth.

- A. Para 1 needs no reply.
- B. Para 2 is denied. The appellant has got no prima facie case and in view of the law on the subject and the judgments of superior courts of the country including this Hon'ble Tribunal there is no chance of the success of the above titled appeal.
- C. Para 3 & 4 as laid are incorrect. The answering respondent has already received the charge of the office and illegally & forcibly has been abstained from performing her duties under the law and thus any order as prayed for shall be hampering public interest and shall be inconvenient both to the answering respondent and against the law.



(10)

D. Paras No. 5 & 6 are wrong and incorrect. The respondent No.5 has a prima facie defense in her favour and she is sanguine that the appeal is meritless and liable to be dismissed, hence, the grounds of the reply of respondent No.5 may be considered as integral part of this reply.

It is, therefore, most humbly prayed that in the light of above submission the application of the appellant may kindly be dismissed.

Respondent No. 5

Through



Asif Ali Shah  
Advocate High Court

&

Haseen Ullah Gamaryani  
Advocate High Court

11



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

Dated Peshawar the October 06<sup>th</sup>, 2021

**NOTIFICATION**

**NO. SO(SF)E&SED/4-16/Posting/Transfer/2021 (TC):** The Competent Authority is pleased to order the posting / transfer of the following officers of Elementary & Secondary Education Department Khyber Pakhtunkhwa (on administrative grounds), in the best public interest with immediate effect: -

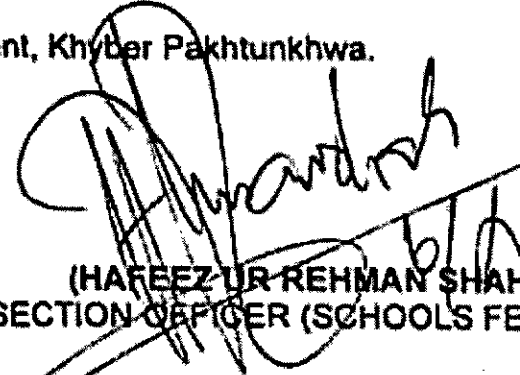
Sr. No	Name & designation	From	To
1	Mst. Shamim Akhtar Wazir Subject Specialist Islamyat (BS-18)	Principal GGHSS Dheri Syedan Mamash Khel Bannu.	GGHSS Kaki Bannu, against the vacant post of Subject Specialist Islamyat (BS-18).
2.	Mst. Shahida Nasreen Principal (BS-18)	GGHSS No-2 Bannu City.	Principal GGHSS Dheri Syedan Mamash Khel Bannu (vice No-1).

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

**Endst: of even No & date**

**Cc to the: -**

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

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

**ATTESTED**

12

**ARRIVAL REPORT**

in Compliance with The order of Government of Khyber Pakhtunkhwa E& SED department  
Notification NO.SO(SF)E&SED/4-16/POSTING/Transfers/2021(TC) dated 06/10/2021  
I Mrs.SHAHIDA NASREEN Principal (BPS\_18) submit my arrival report at GGSS DHERI  
SYEDAN BANNU Afternoon on 11/10/2021.

*Shahida Nasreen*  
Mrs.SHAHIDA NASREEN

PRINCIPAL(BPS-18)

GGSS Dheri Syedan Mamash Khel Bannu

NO: \_\_\_\_\_ GGSS Dheri Syedan Mamash Khel Bannu. Dated: 11/10/2021

Copy to:

1. Accountant General, Kyber Pakhtunkhwa, Peshawar
2. Director E& SED, Kyber Pakhtunkhwa, Peshawar
3. District Education Officer (F) Bannu.
4. District Accounts Officer Bannu.
5. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
6. Deputy commissioner Bannu.
7. District Accounts Officer Bannu.
8. District Monitoring Officer Bannu.
9. School Record.
10. Manager NBP Main Branch 0309 code bannu
11. Manager NBP Jaman Road Branch Bannu.

DA  
Accepted  
Process  
*[Signature]*  
12/10/21

**ATTESTED**



(13)

OFFICE OF THE  
**DISTRICT EDUCATION OFFICER (F) BANNU**  
**OUTSIDE MIRYAN GATE NEAR GHS NO.4 BANNU**  
PH No. 0928-660019

No. 786

Dated 14/10/2021

The Director,  
E&SED, KP, Peshawar.

Subject: - **COMPLIANCE OF TRANSFER ORDER & NON COOPERATIVE ATTITUDE OF CONCERNED OFFICER**

TO,

Enclosed please find herewith an original application in r/o Shahida Nasreen Principal GGHSS Dheri Saeedan Mamsh Khel Bannu on the subject cited above, is forwarded for further process, Please.

Encls: Original application

**DISTRICT EDUCATION OFFICER FEMALE  
BANNU**

Dated 1 / 10 / 2021

No \_\_\_\_\_

Copy for information to the,

1. P.s to Secretary (E&SED) Kp, Peshawar
2. Shahida Nareen Principal GGHSS Dheri Saeedan Mamash Khel Bannu.

**ATTESTED**

**DISTRICT EDUCATION OFFICER FEMALE  
BANNU**

**RELIVING CHIT**

In Compliance with The orders of Government of Khyber Pakhtunkhwa E& SED department  
 Notification NO.SO(SF)E&SED/4-16/POSTING/Transfers/2021(TC) dated 06/10/2021

Mrs.SHAHIDA NASREEN working as SSS(ISLAMYAT) (BPS\_18) is here by relieved from her  
 duties at GGHSS NO,2 Bannu city, today on dated 11/10/2021 Fore noon. She is directed to join  
 her duty at GGHSS DHERI SYEDAN BANNU

*[Signature]*  
 PRINCIPAL

GGHSS NO,2 Bannu city.

NO: 200-9 GGHSS No,2 Bannu city. Dated: 11/10/2021

Copy to:

1. Accountant General, Kyber Pakhtunkhwa, Peshawar
2. Director E& SED, Kyber Pakhtunkhwa, Peshawar
3. District Education Officer (F) Bannu.
4. District Accounts Officer Bannu.
5. PS to Secretary, E&SE Department, Khyber Pakhtun khwa.
6. Deputy commissioner Bannu.
7. District Accounts Officer Bannu.
8. District Monitoring Officer Bannu.
9. School Record

*[Signature]*  
 Principal  
 GGHSS No 2  
 Bannu

**ATTESTED**

OFFICE OF THE PRINCIPAL GGHSS DHERI SYEDAN BANNU.

No.1-9 /charge report Dated;20/10/2021

CHARGE ASSUMPTION REPORT

In compliance to the Govt: of Khyber Pakhtunkhwa Elem: & Secy: Education Department Notification issued under Endst: No. SO(SF)E&SED/16/POSTINGLTRANSFER/2021(TC) Dated 06-10-2021, I the undersigned assumed the charge of the Principal GGHSS Dheri Syedan Bannu today on 20-10-2021 accordingly please.

All concerned are informed to make Official correspondence with the undersigned in future please.

(MST: SHAHIDA NASREEN)  
PRINCIPAL (B-18)  
GGHSS DHERI SYEDAN BANNU

*Shahida Nasreen*  
Principal  
20/10/2021  
GGHSS Dheri Syedan  
Mamsh Knel Bannu

*D. No. 1818*  
*dt. 20/10/2021*

*DA*  
*Process the case*  
*immediately*  
*21/10/21*

Copy for information & N/A to the :-

- 1- Accountant General Khyber Pakhtunkhwa.
- 2- Secretary Elem: & Secy: Education Khyber Pakhtunkhwa.
- 3- Section Officer (Schools/Female) E&SED KPK.
- 4- Director Elem: & Secy: Education KPK
- 5- District Education Officer (Female) Bannu.
- 6- District Account Officer Bannu.
- 7- Manager National Bank of Pakistan Railway Road Bannu.
- 8- School clerk concerned for office record.
- 9- All concerned.

PRINCIPAL (B-18)  
GGHSS DHERI SYEDAN BANNU

*Shahida Nasreen*  
Principal  
20/10/2021  
GGHSS Dheri Syedan  
Mamsh Knel Bannu

**ATTESTED**

16

*Handwritten notes:*  
CJad  
D  
To look in  
matter & further  
26/10/21  
U62E

OFFICE OF THE PRINCIPAL GGHSS DHERI SYEDAN MAMASH KHEL BANNU

NO: 10-13/Non compliance Report

Dated: 22/10/2021

TO

The DEO(F) E&S.ED Bannu.

Subject: Non compliance of Transfer orders at GGHSS Dheri syedan Bannu.

R/Madam,

*Handwritten note:*  
D. No. 1801  
Dt. 26/10/2021

I approach to your kind self with the following facts:

- In compliance with orders Issued under Endst No:SO(SF)E&SED/4-16/ POSTING / TRANSFERS / 2021(TC), I reported my arrival at GGHSS DHERI SYEDAN Bannu at 11/10/2021 AN .But not accepted by principal Shamim Akhtar.(accepted by your kind self dated 12/10/2021.(report submitted)
- From 11<sup>th</sup> to 20<sup>th</sup> October I attended the said school but charge was not handed over.
- On 15<sup>th</sup> day of transfer orders, I Assumed the charge of Principal GGHSS Dheri Syedan Mamsh khel Bannu at
- 20/10/ 2020.( charge report submitted).
- Now the situation is that Mrs. Shamim is still in chair and is not handing over the charge of school due to her issues.

The matter is very serious and reported to you for further directives and record please.

Your early response is awaited.

Thanks in anticipation.

SHAHIDA NASREEN

PRINCIPAL

GGHSS Dheri syedan Mamash khel Bannu

Endst of even NO & date

Copy to:

1. Honourable Secretary E.SED Khyber Pakhtun Kwa.
2. Director E.SED KPK.
3. District education officer (F) Bannu.
4. Personal file

*Handwritten signature:*  
22/10/2021  
Shahida Nasreen  
Gold Medalist  
Principal (E&S-18)  
GGHSS Dheri Syedan  
Mamash Khel Bannu

SHAHIDA NASREEN

PRINCIPAL

GGHSS DHERI SYEDAN

**ATTESTED**



17

**OFFICE OF THE  
DISTRICT EDUCATION OFFICER (F) BANNU  
OUTSIDE MIRYAN GATE NEAR GHS NO.4 BANNU  
PH No. 0928.660019**

No. 991

Dated 25/10/2021

To,

The Director,  
E&SED, KP, Peshawar.

Subject: - **NON COMPLIANCE OF TRANSFER ORDER AT GGHSS DHERI  
SYEDEN BANNU**

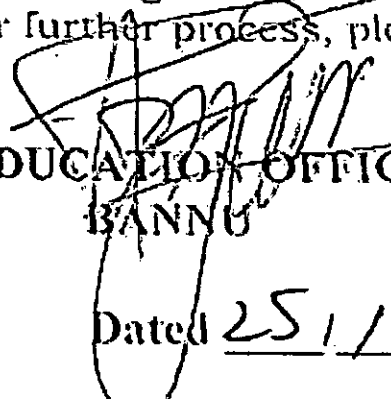
MEMO,

Reference this office Letter NO. 787-88 dated 14-10-2021 and letter No. 10-13/Non compliance report dated 22-10-2021 of Principal GGHSS Dheri Syeden Bannu on the subject cited above.

It is stated for your kind information that worthy Secretary E&SED, KP, Peshawar issued transfer/adjustments order of teaching cadre posts vide No. SO (SF) E&SED/4-16/POSTING /Transfer/2021 (TC) dated 06-10-2021, But one Mst:Shamim Wazir Ex-Principal willingly ignore the high-up's instructions and not ready to handed over the school charge to original incumbent namely Shahida Nasreen as Principal GGHSS Dheri Saidan Mamash Khel Bannu. The said Shamim Wazir transferred from GGHSS Dheri Saidan Mamsh Khel to GGHSS Kakki Bannu to her original post as (Senior subject Specialist) and Shahida Nasreen adjusted on her original cadre and post at the aforementioned place.

Now the said case is forwarded along with enclosed letter / application of Principal Shahida Nasreen for further process, please

Incls: Original application

  
DISTRICT EDUCATION OFFICER FEMALE  
BANNU

ven No 992-94

Dated 25/10/2021

Copy for information to the,

1. P.s to Secretary (E&SED) Kp, Peshawar
2. Shahida Nareen Principal GGHSS Dheri Saecdan Mamash Khel Bannu.

  
DISTRICT EDUCATION OFFICER FEMALE  
BANNU

**ATTESTED**



18

کامران

**OFFICE OF PRINCIPAL GGHSS DHERI SYEDAN MAMASH KHEL**

Endst No: 19-22/GGHSS Dheri Syedan bannu

Dated: 29/10/2021

To

The District Education Officer(F),

E & S.ED Bannu.

D-no: 1883  
dt. 02/11/2021

Subject: Non compliance of Transfer orders/Non Cooperative attitude /Refusal from handing over Charge

R/Madam,

With due respect , It is to bring to your notice that my previous letters :-

- Endst NO:1-9/GGHSS Dheri SYedan dated 20/10/2021
- Endst No:10-13/GGHSS Dheri Syedan dated 22/10/2021
- Endst No:14-17/GGHSS Dheri syedan dated 23/10/2021

The under Transfer Principal Mst.SHAMIM AKHTAR WAZEER is not handing over charge with the arguments that Transfer orders On Administrative grounds/wrong posting are not acceptable to her. It makes me Cringe.

Inspite of my assumption of charge(already endorsed to respected office.), She is Still in chair.

Now from 25<sup>th</sup> of october 2021 she is on leave/on duty at Peshawar. In her absence the concerned Incharge Mrs.Nizakat shaheen SST(G) stands on her Madam's decision and refused from handing over charge.

The respected office is well aware of her complaining attitude and my 12 years administrative capabilities.(Alhamdulillah ..Me GOLD MEDALIST in Administration).

Please give directives& Kindly Resolve the Issue for the best interest of School & public.

Thanks in anticipation

Shahida Nasreen (Gold Medalist) Principal  
 PRINCIPAL  
 GGHSS Dheri Syedan Mamash khel Bannu.

29/10/2021

No. & Date Even

Copy for information & N/A to :

- 1- The Secretary Elem: & Secy: Education Khyber Pakhtunkhwa.
- 2- The Section Officer (Schools/Female) E&SED KPK.
- 3- The Director Elem: & Secy: Education KPK
- ✓ 4- The District Education Officer (Female) Bannu.

Principal 29/10/2021  
 PRINCIPAL GGHSS Dheri Syedan  
 Mamash khel Bannu.

DA  
 Put up DPA  
 for groups.  
 01/11/21

**ATTESTED**

19

7

**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
Block "A" Opposite MPA's Hostel, Civil Secretariat Peshawar

Dated Peshawar the October 25, 2021

**REGULAR**

**SO(SM) E&SED/7-1/2021/PT:** It has been noticed with great concerned by the competent Authority that Teachers/officers (BS-17 to BS-20) have not relinquished/turned charge of their posts on posting/transfer Notifications issued by this Department. Hence, all concerned teachers/officers are directed to comply with this Department Notifications and charge relinquishment/ assumption report be submitted to Department by 27<sup>th</sup> October 2021

In case of failure, disciplinary proceeding will be initiated against the delinquent officers/officials under the Govt. Rules/policy

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

**List of even No & Date**

is forwarded to the:

1. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
2. Director, DPD Khyber Pakhtunkhwa Peshawar.
3. Director, DCTE, Abbottabad
4. Director, EMIS for uploading on Website.
5. All District Education Officers (Male/Female), Khyber Pakhtunkhwa for strict compliance and immediate report in the matter.
6. PS to Minister for E&SE Department
7. PS to Secretary E&SE Department
8. PS to Special Secretary E&SE Department
9. PA to Additional Secretary (Estb) E&SE Department.

**ATTESTED**

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

25/10

Dated Peshawar the October 25, 2021

REGULAR

SO(SM) E&SED/7-1/2021/PT: It has been noticed with great concerned by the competent Authority that Teachers/officers (BS-17 to BS-20) have not relinquished/assumed charge of their posts on posting/transfer Notifications issued by this Department. Hence, all concerned teachers/officers are directed to comply with this Department Notifications and charge relinquishment/ assumption report be submitted to Department by 27<sup>th</sup> October 2021.

In case of failure, disciplinary proceeding will be initiated against the delinquent officers/officials under the Govt. Rules/policy.

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

List: of even No. & Date

Copy forwarded to the:

1. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
2. Director, DPD Khyber Pakhtunkhwa, Peshawar.
3. Director, DCTE, Abbottabad.
4. Director, EMIS for uploading on Website
5. All District Education Officers (Male/Female), Khyber Pakhtunkhwa for strict compliance and immediate report in the matter.
6. PS to Minister for E&SE Department.
7. PS to Secretary E&SE Department.
8. PS to Special Secretary E&SE Department.
9. PA to Additional Secretary (Estb) E&SE Department.

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

ATTESTED

20

**OFFICE OF THE  
DISTRICT EDUCATION OFFICER (F) BANNU  
OUTSIDE MIRYAN GATE NEAR GHS NO.4 BANNU  
PH No. 0928-660019**

No. 2149

Dated 05/11/2021

To,

The Shamim Wazir (SSS)  
Ex-Principal GGHSS Mamash Khel,  
Bannu

Subject: - NON-COMPLIANCE OF HIGH-UP'S INSTRUCTIONS

MEMO,

Enclosed please find herewith a directive notification issued by the Worthy Secretary E&SED, KP, Peshawar on the subject cited is forwarded for further process and implementation.

Encls: NOTIFICATION COPY

  
DISTRICT EDUCATION OFFICER FEMALE  
BANNU

Dated 05/11/2021

Even No \_\_\_\_\_

Copy for information to the,

1. P.s to Secretary (E&SED) Kp, Peshawar
2. P.A to Director (E&SED) Kp, Peshawar
3. Deputy Commissioner Bannu
4. Shahida Nasreen Principal GGHSS Dheri Saidan Mamash Khel Bannu.

DISTRICT EDUCATION OFFICER FEMALE  
BANNU

ATTESTED



21

GOVERNMENT OF NWFP  
SCHOOLS & LITERACY DEPTT

DATED PESHAWAR THE 03-03-2007.

## NOTIFICATION.

NO.SQ(S)13-1/2006/HM(Female). Consequent upon the recommendations of the NWFP Public Service Commission, the Competent Authority has been pleased to appoint the following Headmistress in BPS-17 (Rs.7140-535-17840) plus usual allowances as admissible under the rules on Regular basis but without pension and gratuity in terms of Section-19 of the Civil Servant Act 1973 as amended vide NWFP Civil Servants (Amendment) Act, 2005 with immediate effect under the provision of Establishment & Administration Department Circular bearing No.SQR.6(E&AD) 13-1/2005 dated 10-8-2005.

S.No	Name with Father's Names and address.
1-	Shaukat Ara D/O Haji Aman Ullah Jan, (Bait-ul-Aman) Street-3, Canal Town, Nasir Bagh Road, Peshawar.
2-	Miss Rakhm Akhtar D/O Sultan Khan, Village & P.O. Dagai, Tehsil and District, Swabi Mohallah Juna Khail.
3-	Rukhsana Tabassum D/O Muhammad Sualiheen, Village, P.O. & Tehsil Barikot Mohallah Fazal Abad, District Swat.
4-	Naheed Anjum D/O Shah Jehan, Shah Jehan Flat -3 Block-E Cantonment Board Gulbarg-I, Peshawar Cantt.
5-	Shahnaz Faiz D/O Faiz Ullah Khan, C/O Faizullah Khan (Late) Shaheen Street Rahim Bazar Distt. D.I.Khan.
6-	Aneela Mansoor D/O Sarwar Khan, H.No.1640 Mohallah Khalji Zia, Nawan Shahr Abbottabad.
7-	Majida Ehsan Saddozai D/O Sardar Ehsan Ullah Khan, Mohallah Gurhi, Saddozai, Dera Ismail Khan.
8-	Shafiqat Rehman D/O Fazal-ur-Rehman, Swabi House Near Shama Ghee Mills Karimi Town Aman Garh Tehsil & District Nowshera.
9-	Hussan Ara D/O Walidullah, Atta Brothers Hamilton Road Near Old Bus Stand Pakistan Chowk Mardan.
10-	Miss Yasmin Akhtar D/O Sahib Zaman, H.No.126/C Mohalla Nawab Bannu City.
11-	Sheraz Begum D/O Muhammad Ilyas, Alam Colony Bughdada, Mardan.
12-	Fozia Kanwal D/O Abdur Rahim, House No.812/C Sham Gunj Mardan.
13-	Maisra Gul D/O Muhammad Daud, Ex-Agriculture Officer Ghazi Village, P.O. & Tehsil Ghazi District Haripur.
14-	Robina Kaukab D/O Mahmood, Village & P.O. Thana Moh. Near Girls College Thana Malakand.
15-	Qaiser Shaheen D/O Fazal Hussain Shah, C/O S.Wasim Abbas Advocate S/O Syd Ghulam Abbas Shah Moh Dr. Jalal Hussain Shah D.I.Khan.
16-	Zia Begum D/O Mukarrab Khan, Village Sanga P.O Shakh No.6 Via Umarzai, District Charsadda.
17-	Miss Yasmin Khalida D/O Allah Bakhsh, H.No.213 St. 11 Sector L-2 Phase-III, Hayatabad, Peshawar.
18-	Afia Shah D/O S.Shah-Iqbal, House No.3117 Link Road Abbottabad.
19-	Fatima Batool D/O Faham Dil, Mohallah Khan Khel Village & P.O. Marghuz Tehsil & District Swabi.
20-	Naheed Akhtar D/O Fazal-e-Qadir, House 1/1 New Block Sadar Bazar Risalpur Cantt. Post Code 24080 Nowshera District.
21-	Parveen Rehman D/O Waheed-ur-Rehman, Village & P.O. Ghar Shin Tehsil & District Swat.
22- ✓	Shahida Nasreen D/O Ghulam Hussain, House No.574/C College Street Near Islamia High School No.2 Bannu.
23-	Shakeela Naz D/O Bahramand Khan, C/O Sardar Ali Javaid Sports Center Karnal Sher Kili (Nawan Kili) Tehsil & District Swabi.

ATTESTED

Scanned with  
MOBILE SCANNER

24	Iffat Nasir D/O Nasir Ahmad, Bungalow No.2 Adjacent to GHS No.1 Saidu Sharif College Colony, Swat.
25-	Riaz Begum D/O Farid Khan, District & Tehsil Charardda P.O. Shabqadar Village Shabqadar, Moh. Fulma-Khel.
26-	Miss Bibi Rizwana D/O Sikandar Khan, Awan Medicoe Main Bazar Saidu Kurram Agency.
27-	Bushra Salahud Din D/O Malik Salahud Din, C/O Malik Salahud Din Ex-MPA Basti Kanchkian Wall Dera Ismail Khan.
28-	Bascerat Naz D/O Shah Wali Khan, P.O. & Tehsil Ekka Ghund Tehsil & District Shabqadar Mohmand Agency.

2- On their appointment they are posted in Government High Schools as noted against each subject to the conditions given below:

S.No	Name.	To be posted as.	Remarks
1-	Shaukat Ara D/O Haji Aman Ullah Jan	HM (BS-17), GGHS, Ismail Khel, Bannu.	Against Vacant Post
2-	Miss Rakham Akhtar D/O Sultan Khan.	HM (BS-17), GGHS, Adeena, Swabi.	-do-
3-	Rukhsana Tabassum D/O Muhammad Sualihien.	HM (BS-17), GGHS, Barikot, Swat.	-do-
4-	Naheed Anjum D/O Shah Jehan.	HM (BS-17), GGHS, Pabbi, Nowshera.	-do-
5-	Shahnaz Faiz D/O Faiz Ullah Khan.	HM (BS-17), GGHS, Abdul Khel, D.I.K.	-do-
6-	Aneela Mansoor D/O Sarwar Khan	HM (BS-17), GGHS, Khutawal, Abbottabad.	-do-
7-	Majida Ehsan Saddozai D/O Sardar Ehsan Ullah Khan.	HM (BS-17), GGHS, Chudwan, D.I.K.	-do-
8-	Shafqat Rehman D/O Fazal-ur-Rehman	HM (BS-17), GGHS, Zaida, Swabi.	-do-
9-	Hussan Ara D/O Wahidullah.	HM (BS-17), GGHS, Jalala, Mardan.	-do-
10-	Miss Yasmin Akhtar D/O Sahib Zaman.	HM (BS-17), GGHS, Adami Sultan Ali, Bannu.	-do-
11-	Sheraz Begum D/O Muhammad Ilyas.	HM (BS-17), GGHS, Sher Garh, Mardan	-do-
12-	Fozia Kanwal D/O Abdur Rahim.	HM (BS-17), GGHS, Sawal Dher, Mardan.	-do-
13-	Maisra Gul D/O Muhammad Daud	HM (BS-17), GGHS, Hilmat, Ghazi, Haripur.	-do-
14-	Robina Kaukab D/O Mahmood.	HM (BS-17), GGHS, Totai, Malakand	-do-
15-	Qaiser Shaheen D/O Fazal Hussain Shah	HM (BS-17), GGHS, Darband Kalan, D.I.Khan.	-do-
16-	Zia Begum D/O Mukarrab Khan	HM (BS-17), GGHS. Services Placed at the Disposal of Director of Education (FATA) for further posting.	-do-
17-	Miss Yasmin Khalida D/O Allah Bakhsh.	HM (BS-17), GGHS, Wadpaga, Peshawar.	-do-
18-	Afia Shah D/O S.Shah Iqbal	HM (BS-17), GGHS, Baldher, Haripur.	-do-
19-	Fatima Batool D/O Faham Dil	HM (BS-17), GGHS, Bam Khel, Swabi.	-do-
20-	Naheed Akhtar D/O Fazal-e-Qadir.	HM (BS-17), GGHS, Nowshera Cantt.	-do-
21-	Parveen Rehman D/O Waheed-ur-Relunan	HM (BS-17), GGHS No.2, Saidu Sharif, Swat.	-do-
22-	Shahida Nasreen D/O Ghulam Hussain	HM (BS-17), GGHS, Mewa Khel, Surani, Bannu.	-do-
23-	Shakeela Naz D/O Bahramond Khan	HM (BS-17), GGHS, Tarakai, Swabi.	-do-
24-	Iffat Nasir D/O Nasir Ahmad.	HM (BS-17), GGHS, Abuha, Swat.	-do-
25-	Riaz Begum D/O Farid Khan.	HM (BS-17), GGHS, Services Placed at the Disposal of Director of Education (FATA) for further posting.	-do-
26-	Miss Bibi Rizwana D/O Sikandar Khan	HM (BS-17), GGHS, Services Placed at	-do-

TESTED  
MOBILE SCANNER

Bushra Salahud Din D/O Malik Salahud Din.	HM (BS-17), GGHS, Band Kurai, D.I.Khan.	-do-
Bascerat Naz D/O Shah Wali Khan	HM (BS 17), GGHS, Services Placed at the Disposal of Director of Education (FATA) for further posting.	do

23

TERMS & CONDITIONS.


- 1- Their services will be considered regular but without pension or Gratuity in term of Section-19 of the NWFP Civil Servant Act, 1973 as amended vide NWFP Civil Servants (Amendment) Act, 2005. They will however be entitled to Contributory Provident Fund in such a manner and at such rates as may be prescribed by the Government.
- 2- Their services will be liable to termination on one month's notice from either side. In case of resignation without notice, their two month's pay/allowances, shall be forfeited to Government.
- 3- The appointee should join her post within 30-days of the issue of this notification. The Director, Schools & Literacy, NWFP, Peshawar would furnish a certificate to the effect that the candidates have joined the post or otherwise, after one month of the issue of this Notification, failing which her candidature will expire automatically and no subsequent appeal etc shall be entertained.
- 4- They would be on probation for a period of two years extendable for another one year.
- 5- They will be governed by such rules and regulations as may be issued from time to time by the Government.
- 6- Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they will be proceeded against under the NWFP Removal from Service (Special Power) Ordinance, 2000 and the Rules framed from time to time.
- 7- Charge report should be submitted to all concerned.
- 8- No TA/DA will be allowed to the appointees for joining their duty.

SECRETARY.

ENDST. NO. & DATE EVEN.

Copy forwarded for information & necessary action to:

- 1- Accountant General, NWFP, Peshawar.
- 2- Director, Schools & Literacy, NWFP, Peshawar.
- 3- Director of Education (FATA), NWFP, Peshawar.
- 4- District/Agency Accounts Officers Concerned.
- 5- EDOs, S&L Concerned.
- 6- PS to Minister for Education, NWFP, Peshawar.
- 7- PS to Chief Secretary, NWFP, Peshawar.
- 8- PS to Secretary, Schools & Literacy Deptt. NWFP, Peshawar.
- 9- Candidates Concerned.
- 10- Principal concerned.
- 11- Director Recruitment, NWFP Public Service Commission, Peshawar.
- 12- Deputy Data Base Administrator, S&L Deptt. NWFP, Peshawar.
- 13- PA to Additional Secretary, S&L Deptt. NWFP.
- 14- PA to Deputy Secretary (Admn) S&L Deptt. Peshawar.
- 15- Office order file.

  
 INEK NAWAZ KHAN  
 SECTION OFFICER (SCHOOLS)

TESTED



KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
24 DEPARTMENT

2

Dated Peshawar the October 7<sup>th</sup>, 2016

**NOTIFICATION**

**NO. SO(S/FE&SED/L-3/2016/PSB/Promotion/BS-17 to BS-18:** On the recommendations of the Provincial Selection Board, the Competent Authority (Chief Minister Khyber Pakhtunkhwa) is pleased to promote the following female officers (Teaching Cadre) of Elementary & Secondary Education Department from BS-17 to BS-18 on regular basis with immediate effect:-

S#	Name of Officer and School Address
1	Mst Dilafroz H.M GGHS Baghpur Dheri Haripur
2	Nusrat Bibi d/o Abdul Manan DDEO (F) Dir Lower
3	Mst Nudrat Nadia SS (Eng) GGHSS Hayatabad Peshawar.
4	Mst Sima Gul d/o Siffat Khan H.M GGHS Miran Shah NWA.
5	Mst Bilquis Sethi SS (Econ) d/o Abdul Wadud Sethi GGHSS Akbarpura Nowshera
6	Mst Abida Akber SS GGHSS Sherpao CHD.
7	Mst Naheed Begum SS GGHSS No.2 Saidu Sharif Swat.
8	Mst Saeeda Begum SS d/o Qasim Jan GGHSS Khazana Dheri Mardan.
9	Mst Naima Ambreen Anjum SS d/o Ahmad Din GGHSS No.5 DIK.
10	Mst Ambreen Raza SS d/o Raza Khan GGHSS Sikandar Khel Bala Bannu
11	Mst Nasim Shahi SS d/o M.Pervaiz GGHSS Kabal Swat.
12	Mst Nighat Akhtar SS d/o Said Muhammad GGHSS Odigram Swat.
13	Mst Riffat Aziz SS d/o Azizur Rehman GGHSS Gharl Habibullah Mansehra.
14	Mst Tabassum Jabeen SS d/o Usman ud Din GGHSS Nowshera Kalan.
15	Mst Yasmin Akhtar SS d/o Abdur Rehman GGHSS Pir Pal Nowshera.
16	Mst Fozia Barfas SS d/o Masaod Bakht Mirza GGHSS No.1 Karak
17	Mst Bibi Shabnamzeb SS (Bio) d/o M.Auranzeb GGHSS Malak Pura ATD.
18	Mst Naheed Begum SS d/o Sher Afzal GGHSS Hayatabad Peshawar

**ATTESTED**



Sl No	Name of Officer and School Address	Proposed place of Posting	Remarks
202	Mst Fatima Batool HM d/o Faham Dil GGHS Bam Khel Swabi.	Principal BS-18 GGHS Gar Munara Swabi	Vice S.No.333
203	Mst Nahed Akhtar HM d/o Fazle Qadar GGHS ASC Centre Nowshera	Principal BS-18 GGHS ASC Centre Nowshera	Already Occupied by her
204	Mst Shaukat Ara HM D/O H.Aman Ullah Jan Asst: Director (F) Directorate of E&SE Peshawar	Dy. Director (F) BS-18 Directorate of E&SE Khyber Pakhtunkhwa Peshawar	Vice S.No.334
205	Mst Shahida Nasreen HM d/o Ghulam Hussain GGHS Mewa Khel Surani Bannu.	Principal BS-18 GGHS Dheri Saldan Bannu	A.V.P
206	Mst Shakila Naz HM d/o Bahramand Khan GGHS Tarlandi Swabi.	Principal BS-18 GGHS Tarakot Swabi	A.V.P
207	Mst Iffat Nasir HM d/o Nasir Ahmad GGHS Aman kot Swat	Inst: BS-18 RITE (F) Barikot Swat	A.V.P
208	Mst Riaz Begum HM d/o Farid Khan GGHS Mian Mandi Mohmand Agency	Service placed at the disposal of Director FATA	A.V.P
209	Mst Zia Begum I/C Principal d/o Mukarab Khan GGHS Ghalanai Moh: Agency	Service placed at the disposal of Director FATA	A.V.P
210	Mst. Farzana Bibi D/O Fazal Qadar SS (Islamiyat) GGHS Tilar Khel Lekki	Principal BS-18 GGHS Pezo Lekki Marwal	Vice S.No.335
211	Mst. Nadia Akhtar D/O Muhammad Akhtar SS (English) GGHS Comp: A/Abad	SS (Eng) BS-18 GGCHSS A/Abad	Already Occupied by her
212	Mst. Salma Ambreen D/O Shahid Lalif SS (English) GGHS Qamar Zaman Mandew Bannu	SS (Eng) BS-18 GGHS No.2 Bannu City	A.V.P
213	Mst. Sherin Jamshid SS (Biology) D/O Jamshid Nisar GGHS Sakhakot Mkd	Vice Principal GGHS Sakhakot Malakand	Vice S.No.
214	Mst Alla D/o Gul Zar Shah SS (Chemistry) GGHS Rashakai Nowshera	SS (Chemistry) BS-18 GGHS Nowshera Kalan	A.V.P
215	Mst. Tauheeda Anjum D/O Abdul Wahid SS (English) GGHS Rustam Khel Mardan	Inst: BS-18 RITE (F) Swabi	A.V.P
216	Mst. Shehreen Begum D/O Pal Janan SS (Economics) GGHS Badhaber Peshawar	Principal BS-18 GGHS Hassan Zai Charsadda	A.V.P
217	Mst. Nargis Nasreen D/O Muhammad Ramzan SS (Economics) GGHS Chamkani Peshawar	SS (Econ) BS-18 GGHS Chamkani Peshawar	Already Occupied by her
218	Mst. Musarrat Shah D/O Muhammad Shah Khisro SS (English) GGHS Chakdara Dir Lower	SS (Eng) BS-18 GGHS Ziarat Talash Dir Lower	A.V.P
219	Mst. Fozia Noreen D/O Abdul Jalil SS (Islamiyat) GGHS Bafa Mansehra	SS (Islamiyat) BS-18 GGHS No.2 Mansehra	A.V.P
220	Mst. Bibi Iffat Nazneen D/O Muhammad Younis SS (Chemistry) GGCMS Kot Najeibullah Haripur	SS (Chemistry) BS-18 GGCMS Kot Najeibullah Haripur	Already Occupied by her
221	Mst. Shaista Bano D/O Manzoor Elahi SS (Physics) GGHS Panian Haripur	Vice Principal GGCMS No.1 Haripur	Vice S.No.
222	Mst. Sadia Rafiq SS (Biology) D/O Muhammad Rafiq GGHS Nowshera Cantt	Vice Principal BS-18 GGHS Akora Khattak Nowshera	A.V.P
223	Mst. Rizwana Arshad SS (History-cum civics) D/O Zardad Khan GGHS Damtor A/Abad	SS (His-cum-Civics) BS-18 GGHS Dhamtor A/Abad	Already Occupied by her

25

ATTESTED

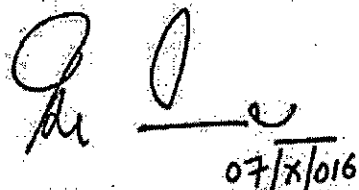
4. No TA/DA will be allowed for joining their duties.

**SECRETARY**

**Endst: of even No. & date:**

Copy forwarded to the: -

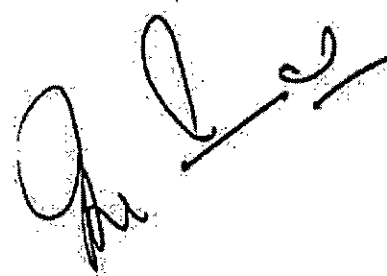
1. Accountant General Khyber Pakhtunkhwa, Peshawar.
2. Director E&SE Khyber Pakhtunkhwa, Peshawar.
3. Director Education (FATA) FATA Secretariat Warsak Road Peshawar.
4. Director DCTE Abbottabad.
5. Director PITE Khyber Pakhtunkhwa.
6. Director RITE (F) Khyber Pakhtunkhwa.
7. District Education Officers (Female) concerned.
8. District Accounts Officers concerned.
9. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa, Peshawar.
10. PS to Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
11. PS to Minister E&SE Khyber Pakhtunkhwa Peshawar.
12. PS to Secretary E&SE Department.
13. Incharge EMISE, E&SE Department for uploading at official website at the earliest.
14. Officers concerned.
15. Office order file.



07/x/16

(LAL SAEED KHATTAK)

SECTION OFFICER (SCHOOLS/FEMALE)



**ATTESTED**

1. SHAHIDA NASREEN D/O CHUKAN HUSSAIN

I hereby declare that I was born of parents who are permanently domiciled in North West Frontier Province having been born/~~settled~~ in the Province.

S. D. Hussain  
(Female) Bannu  
C.D.O (Accounts)

I was born at Village/Monallah BANNUCITY  
AND District Bannu. ✓

MUHAMMAD A. I.  
Chairman  
B.C. Yard No. 8 Bannu

*[Handwritten signature]*

Shahida Nasreen  
SHAHIDA NASREEN  
Signature of the applicant.  
Dated 12/1/1992

Pursuance to the declaration dated 13-1-1992 filed by Mr. SHAHIDA NASREEN D/O CHUKAN HUSSAIN domiciled to North West Frontier Province. It is hereby certified that the said SHAHIDA NASREEN is born of parents who are permanent residents of the North West Frontier Province having been born/~~settled~~ within it.

I have satisfied my self from personal knowledge verification N. Tehsildar Bannu that the above declaration is true and certify accordingly.

This 14th day of January 1992.

PHOTO.

Phone No. 3414.

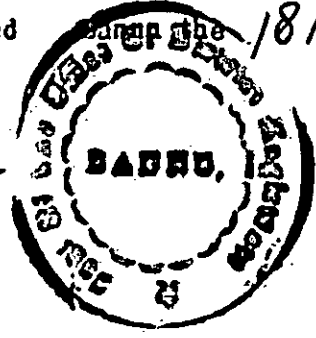
*[Handwritten signature]*  
Magistrate 1st Class, Bannu.  
Seal of the Court.  
Ali Zaman Mahomed

OFFICE OF THE DEPUTY COMMISSIONER, BANNU.

No. 160 HC dated 18/1/1992

COMMENSIGNED.

*[Handwritten signature]*



( Arbab Azizullah Khan )  
District Magistrate, Bannu.

*[Handwritten signature]*

ATTESTED

" Ali Jan "



5

29

To

The MINISTER of EDUCATION,

Khyber Pakhtun Khwa Peshawar.

Subject: Appeal for Justice( Transfer/adjustment On actual cader post of principal)

R/Sir,

With due respect, It is stated that I have been wrongly adjusted as SSS BPS-18 at GGHS No,2 Bannu under Notificatio :NO.SO(SF)E&SED/416/2018/posting/Transfer/generals Dated January 29, 2019 and approach to your kind self with the following facts:

- I am MA M. ED GOLD MEDALIST (Adminstration) .( Certificate attached).
- I was selected through Public Service Commission & appointed as HM in BPS\_17 at GGHS Mewa Khel Surani Bannu dated 03-03-2007 and worked there upto 06-10-2016 (about 9years-7months).
- I was promoted dated 07-10-2016 to post of PRINCIPAL at GGHS Dheri syedan Bannu through departmental promotion & worked there for a period of 2years&2months.
- On 29th January 2019 ,I was Transferred by our Prestigious office of Secretariate to the post of SSS against which I appealed for justice through Prime minister citizen portal ,and in written to Secretary Of Education E&SED Peshawar but NO HEERING at all.(transfer&Appeals copy attached).
- My 12Years ADMINISTRATIVE experience & Gold Medal was Ignored and I was transferred to a WRONG POST(order copy attached)  
I completed a period of 2 years&6months in wait of JUSTICE.And again APPEAL against the INJUSTICE of transferring me from the post of PRINCIPAL to SSS & request to adjust/transfer me to the PRINCIPAL Post of GGHS NO,4 ( which is wrongly occupied by an SSS Islamyat) for the Sack of Justice & my 12 Years Administrative Career and Best interst of Public.Kindly the Injustice with me may redeemed by transferring me to the above mentioned post as I can not apply through transfer E Policy because it does not support my wrong post adjustment .More over principal of GGHSNo,4 can be adjusted against its original post cader SSSIslamyat at GGHSNo,2 Bannu City on which I was Transferred wrongly.

R/Sir, MY prvious Appeals Refrences through CITIZENS PORTAL PAKISTAN are as under:

1. Code:KP230421-88275094 Dated23/04/2021( still in progress without solution till 109 days.
2. Code KP150621-88540779 Dated 15/06/2021(lame excuse was given of applying through E policy transfer but E policy donot support wrong adjustment) n0 relief granted and closed.

**ATTESTED**

*Shahida* Thanks & Regards,

SHAHIDA NASREEN(MA M.ED(Gold Medalist)

Working as SSS (islamyat)BPS-18

GGHS NO,2 Bannu city.

Dated:10 -08-2021

TO

The Secretary Elementary & Secondary,  
Education, KPK Peshawar.

Subject: Reminder Appeal For Transfer/Adjustment on Actual cader post of  
Principal BS-18

R/Sir,

With refrence to my Appeal on Citezen Portal Pakistan code:KP230421-88275094 Dated:23-04-2021(106 Days ago).I requested to your kind self for transferring/adjusting me on my actual cader post of principal.

More over Principal post of following schools;

- GGHS NO,4 Bannu City.
- GGHS Kotka Juma Khan Bannu city.
- GGHSS Dheri Syedan Mamash Khel Bannu.

Are wrongly occupied by SS BS-18 because the principls of above mentioned schools were appointed as SS BS-17 in actual and got promotion in BS-18 in same cader(verification can be done by concerned DEO& from HRIS Too).

I have no concern with any personnel but for the sack of justice my grievances should be sympathetically treated and the Injustice notification No:SO(SF)E&SED/4-16/2018/POSTING/TRANSFER/GENERAL Dated Peshawar 29-01-2019. may kindly be Redeemed by transferring/adjudting me to Principal BPS-18 post of the following stated school of Bannu city.

1. GGHS No,4 Bannu city.

Thanks & Regards,

  
SHAHIDA NASREEN

MA M.Ed (Goldmedallist)

Working as SSSislamyat BS\_18

GG HSS NO,2 Bannu city.

Dated: 07-08-2021

CNIC No# 11101-1403377-8

**ATTESTED**

(31) (7)

# Complaint History

2021

JULY 14  
2021



FROM  
DO Education (F), Bannu

STATUS

Forwarded



TO  
SO School Female

## ATTACHMENTS

5100



Attachment

## REMARKS

تبصرہ

Respected Sir/Madam,

The detail of the wrong posting adjustment is hereby attached for ready reference. Regard.

ATTESTED

8 30  
کمیٹی کا سر  
KP150621-88540779

2021-06-15 08:38:21

STATUS

(Closed - Partial relief granted)

## Complaint History

2021

JUN 17  
2021



FROM  
SO School Female

STATUS

Closed - Partial relief  
granted

REMARKS

Dear complainant, please apply on  
E-Transfer app for transfer, please.

تبصرہ

ATTESTED

Regards



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MOBILE SCANNER



To

The Secretary Elementary & Secondary,

Education, KPK Peshawar.

Subject: Reminder Appeal For Transfer/Adjustment

R/Sir,

With reference to my Appeal on Citezen Portal Pakistan code: KP230421-88275094 Dated: 23-04-2021 (54 Days ago). I requested to your kind self for transferring/adjusting me on my actual cader post of principal on vacant post of GGHS ISMAILE MAMA KHEL BANNU.

More over Principal post of following schools

- GGHS NO,4 Bannu City.
- GGHS Kotka Juma Khan Bannu city.
- GGHS Dheri Syedan Mamash Khel Bannu.

Are wrongly occupied by SS BS-18 because the principals of above mentioned schools were appointed as SS BS-17 in actual and got promotion in BS-18 in same cader (verification can be done by concerned DEO & from HRIS Too).

I have no concern with any personnel but for the sack of justice my grievances should be sympathetically treated and the Injustice notification No: SO(SF)E&SED/4-16/2018/POSTING/TRANSFER/GENERAL Dated Peshawar 29-01-2019. may kindly be Redeemed by transferring/adjusting me to any of the following stated schools of Bannu city.

1. GGHS Ismale Mama Khel Bannu.
2. GGHS No,4 Bannu city.
3. GGHS Kotka Juma Khan Bannu.

Thanks & Regards



SHAHIDA NASREEN  
MA M.Ed (Goldmedallist)  
Working as BSS Islamiyat  
GG HSS NO,2 Bannu city.  
Dated: 14-06-2021

**ATTESTED**



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MOBILE SCANNER

10

34

To

The Secretary of Education,

E&S E KPK Peshawer.

Subject: Appeal for Transfer/adjustment.

R/Sir,

With due respect, it is stated that I have been working as SSS(Islamyat)BPS-18 at GGHS No,2 Bannu and approach to your kind self with the following fact:

- I am MA M. ED GOLD MEDALIST (Adminstration) .( Certificate attached).
- I was selected through Public Service Commission & appointed as HM in BPS\_17 at GGHS Mewa Khel Surani Bannu dated 03-03-2007 and worked there upto 06-10-2016 (about 9years-7months).
- I was promoted dated 07-10-2016 to post of PRINCIPAL at GGHS Dheri syedan Bannu through departmental promotion & worked there for a period of 2years&2months.
- On 31<sup>st</sup> January 2019 ,I was Transferred by your Prestigious office to the post of SSS(islamyat) against which I appealed for justice but NO HEERING at all.(transfer&Appeal copy attached).
- My 12Years ADMINISTRATIVE experience & Gold Medal was ignored and I was transferred to a WRONG POST.
- The principal.post of GGHS Ismaile Mamma Khel has been evacuated due to Retirement of Principal.(copies attached). Retired on 31<sup>st</sup> march 2021.

I completed aperiod of 2 years in wait of JUSTICE.And again APPEAL against the INJUSTICE of transferring me from the post of PRINCIPAL to SSS & request to adjust/transfer me to the PRINCIPAL Post of GGHS ISmaile Mamma Khel Bannu for the Sack of Justice & my 12 Years Administrative Career and Best interst of Public.

Thanks &Regards,  
SHAHIDA NASREEN  
MA M.ED(Gold Medalist)  
Working as SSS (islamyat)BPS-18  
GGHS NO,2 Bannu city.

Dated:01 -04-2021

ATTESTED

Subject: Appeal for Justice on wrong post transfer (11)

Sir,  
Most Submissively: it is stated that I am resident of Bannu and Akhmadullah got Gold Medal in M.E (Admin) from Gomal University.

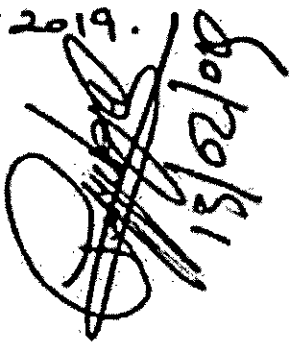
I have been appointed HMRR through Public Service Commission in 03-03-2007 and promoted to the post of Principal GG HSS Dheri Syedan BPS dated 07-10-2016. (2 years 3 months)

Now an instructor named Shamim Wazir from RTE Bannu have been transferred against my post (appointed as Teaching grade 55).

Honourable Sir neither my term is completed nor there is any illegal case, enquiry or corruption matters and I am working in management for about 12 years having best performance, achievements of my institute.

I approach to your kindness at the order dated 29-01-2019. No. SO(SF) ESSE/4-146/2018/Posting/Tri may kindly be revised and I may be adjusted against my original post principal BPS-18 at GG HSS Dheri Syedan Bannu. for sake of justice as this injustice can only be solved by you. (Insha Allah).

I have obeyed your respected order but still awaiting for a justice decision.

dated: 11-02-2019.  


Thank & Regards  
Shahida Nasreen  
Shahida Nasreen  
(Dr) Gold Medalist  
Principal (BPS-18)

ATTESTED

بخدمت جناب سیکرٹری ایجوکیشن صوبہ خیبر پختون خواہ پشاور

12

عنوان: اپیل / درخواست برائے منسوخی آرڈر جاری شدہ بابت تبدیلی ORIGINAL PRINCIPAL POST BPS-18 پر نپل

گورنمنٹ گرلز ہائر سیکنڈری سکول ڈھیری سیدان مش خیل بنوں سے (AGAINST WRONG POST OF SENIOR

(INSTRUCTOR BPS-18

جناب عالی!

گزارش ہے کہ سالکہ بطور ORIGINAL POST OF PRINCIPAL BPS-18 پر عرصہ اکتوبر 2016 سے مندرجہ بالا سکول سے اپنی فرائض منصبی خوش اسلوبی کے ساتھ انجام دے رہی ہوں۔ سالکہ کا Tenure بھی پورا نہیں اور نہ میرے خلاف کسی قسم کی محکمانہ شکایات ہیں اور یہ کہ ہر سال معصوم بچیاں بورڈ اور کھیل کھوڈ میں پوزیشن لے رہی ہیں۔

جناب عالی!

موجودہ سکول سے میرے تبادلے کا آرڈر جاری شدہ 29-01-2019 حوالا نمبر SO (SF) E&SED/4-146/2018/Posting Transfer / General ملا افسوس ہوا کہ میرے جگہ پر WRONG POST والی SENIOR INSTRUCTOR BPS-18 کا تبادلہ کیا گیا ہے۔ حالانکہ میں اپنی ORIGINAL PRINCIPAL BPS-18 کی اسامی پر 2016 سے تعینات ہوں جو کہ میرا NORMAL TENURE بھی پورا نہیں اور جس جگہ میری تبادلہ کیا گیا ہے وہ بھی WRONG POST ہے۔ مجھ میں خوف خداوندی اور اپنی ڈیوٹی کو صحیح طریقے سے ادا کرنے کی سزا دی گئی ہے۔

یہ کہ گورنمنٹ گرلز ہائر سیکنڈری سکول نمبر 2 بنوں میں Senior Subject Specialist BPS-18 کی اسامی خالی پڑی تھی اسی پر محترمہ شیم وزیر سنیر انسٹرکٹر سکیل 18 کا تبادلہ اپنے اصلی پوسٹ پر کیا جانا چاہئے تھا۔ لہذا استدعا ہے کہ سالکہ کے WRONG POST پر POSTING / ADJUSTMENT کو منسوخ کرنے کے احکامات صادر فرمائیں۔

سالکہ تازیت دعا گور ہے گی

العارضہ

مورخہ: 31-01-2019

(شاہدہ نسیر)

PRINCIPAL BPS-18

*Al Farheen*

Principal  
GGHSS Dheri Saidan  
Mamash Khel Bannu

GGHSS DHERI SAIDAN MAMASH KHEL BANNU

نقول برائے منسوخی آرڈر و انصاف دلائی جانے:

1- وزیر اعلیٰ صوبہ خیبر پختون خواہ سے التماس ہے کہ میری تبادلہ کو اصلی پوسٹ سے Wrong پوسٹ پر بلا وجہ کیا گیا ہے۔ منسوخ فرمانے کی استدعا ہے۔

2- PS to Secretary E & SE Department صوبہ خیبر پختون خواہ پشاور برائے انصاف دلائی جانے۔

ATTESTED



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

13

37

(Dated Peshawar the January 29, 2019)

**NOTIFICATION**

NO.SO(SPE&SED/4-16/2018/Posting/Transfer/General: The Competent Authority is pleased to order posting/transfer of the following officers of E&SE Department on the posts/stations as mentioned against each, in the interest of public service, with immediate effect:

S#	Name, designation & present place	Posted as	Remarks
1	Mst. Shamim Akhtar Wazir, Instructor (BS-18) RITE (Female) Bannu Township	Principal (BS-18) GGHSS Dheri Saidan Bannu	V.S#2
2	Mst. Shahida Nasrin, Principal (BS- 18) GGHSS Dheri Saidan Bannu	SS (BS-18) GGHSS No.2 Ghalla Mandi Bannu	A.V.P

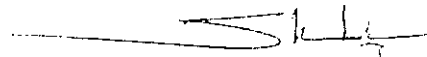
2. No TA/DA is allowed.

Endst: of even No. & Date

**SECRETARY**

Copy forwarded to the:

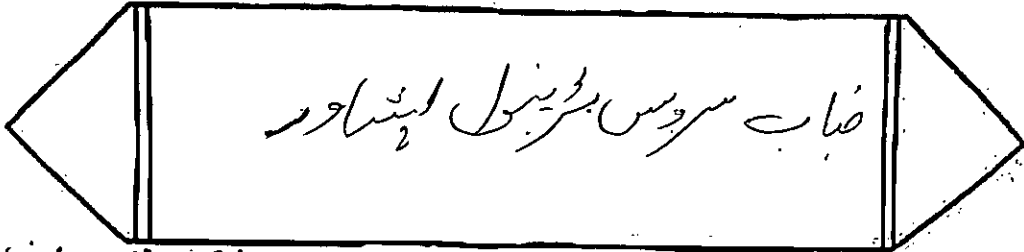
1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar
3. District Education Officers (F), Concerned.
4. District Accounts Officers, Concerned.
5. PS to Advisor to CM for E&SE Department, Khyber Pakhtunkhwa.
6. PS to Secretary E&SE Department, Khyber Pakhtunkhwa.
7. PS to Special Secretary E&SE Department, Khyber Pakhtunkhwa.
8. Incharge EMIS E&SE Department.
9. Officers concerned.
10. Master file.

  
(SHABIR KHAN)  
SECTION OFFICER (SCHOOLS FEMALE)

**ATTESTED**

38

# بعدالت



2012ء بجانب و لیسٹاؤر نمبر 5  
بیتام مشاہیرہ السنہ 1432ھ

مستقیم دفتر وزیر پنجاب چیف سیکرٹری وغیرہ

10-12-2011

موزعہ	10-12-2011
مقدمہ	---
دعویٰ	---
جرم	---

## باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی رکن کارروائی متعلقہ  
آن مقام لیسٹاؤر کیلئے آصف علی شاہ و سید بلال باجوہ ریڈیو لیسٹاؤر

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کہ مقدمہ کی کل کارروائی کا کمال اختیار دیا۔ نیز  
 وکیل صاحب کو نامہ کرنے و تقریرات و فیصلہ بر حلف دینے جواب دہی اور اقبال دعویٰ اور  
 باسورت ڈگری کرنے اجراء اور صولی چیک درو پیار عرضی دعویٰ اور درخواست ہر قسم کی تصدیق  
 ذرا میں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری کی طرف 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 یا اپنے بجائے تقرر کا اختیار  
 ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ  
 پر داخلہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جائنا تو ائے 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  
 مذکور کریں۔ لہذا اوکالت نامہ لکھ دیا کہ سند ہے۔

الرقوم 10 ، 12 ، 21 ، 20

کے لئے منظور ہے۔

بیتام لیسٹاؤر  
Alhasreen  
11101-1403377-8

Responded No# 5

SHAHIDA MASREEN MOBILE SCANNER

adv. bilal bacha@gmail.com

0333-9006806  
0333-8466739

Handwritten signature and stamp: "Handwritten signature" and "SHAHIDA MASREEN MOBILE SCANNER"