#### BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 6340/2020

Date of institution

29.06.2020

Safia Nageen D/o Ahmad Jan, R/o Dab Naguman, Post Office Nahaqi, Tehsil and District Peshawar.

#### **VERSUS**

Government of Khyber Pakhtunkhwa through Secretary Higher Education, Archives and Libraries Department, Peshawar and four others.

ORDER 30.08.2021

Mr. Imran Khan, Advocate, for the appellant present. Mr. Jehanzeb, Superintendent alongwith Mr. Muhammad Rasheed, Deputy District Attorney for the respondents present.

Learned counsel for the appellant stated at the bar that as per instructions of his client, he want to withdraw the instant appeal. In this respect, written endorsement of learned counsel for the appellant obtained at margin of the order sheet.

In view of the above, the appeal in hand stands dismissed as withdrawn. Parties are left to bear their own costs. File be consigned to the record room.

(ATTQ-UR-REHMAN WAZIR)

MEMBER (EXECUTIVE)

(SALÁH-UD-DIN) MEMBER (JUDICIAL)

ANNOUNCED 30.08.2021

Due to summer vacation, case is adjourned to 18.3.2021 for the same as before.



18.03.2021

Counsel for the appellant and Mr. Muhammad Rashid, DDA alongwith M/S Jehanzaib, Superintendent and Hanif Khan, AAO for the respondents present.

The representative of respondents has provided copies of memos. dated 21.12.2020 and 02.03.2021. He states that the matter of adjustment of appellant at Hayatabad has been initiated which is expected to be resolved shortly.

In the peculiar circumstances of the case, the respondents are expected to conclude the matter at the earliest. Adjourned for further proceedings to 07.04.2021 before the D.B.

(Salah-ud-Din) Member (J)

Chairman

07.04.2021

Due to demise of the learned Chairman, the Tribunal is defunct, therefore, case is adjourned to / o / 5 /2021 for the same as before.

10.5.2021 Que to eoved - 19, The case is
affairmed to 30.8.2021 forther france

respondents to collect information regarding availability of vacancy in BPS-19 in any college situated in the territorial limits of Peshawar so that appellant could be accommodated accordingly. Moreover, the respondents were also directed to complete the process of adjustment by giving effect to the order of this august Service Tribunal by the 31<sup>st</sup> of December 2020 failing which the law shall take its own course, respondents are directed to submit compliance report positively on 31.12.2020

before D.B.

(MIAN MUHAMMAD) MEMBER (EXECUTIVE)

A

(MUHAMMAD JAMAL KHAN) MEMBER (JUDICIAL) 10.12.2020

Appellant in person alongwith Mr. Imran Khan, Advocate, are present. Zara Tajwar, Deputy District Attorney and Miss. Lubna Farman, Assistant Director (Litigation), for the respondents are also present.

The request was made by the appellant before the Division Bench of this august Tribunal on 19.11.2020 that her posting order was made consequent upon promotion from BPS-18 to BPS-19 however, she submitted that a vacant post is available to the Government Girls Degree College, Hayatabad, Peshawar, where she can be easily accommodated/adjusted against the post, therefore, representative of respondents was directed to inform the Tribunal in respect of availability of the post of BPS-19 against which appellant could be adjusted. Request for submission of report was made and accordingly the case was adjourned to 08.12.2020. On that very date the representative of the department did not furnish report and sought time for its submission to whom time was granted directing him to submit the requisite report up to 01:00 P.M. After considerable interval and on the resumption of the proceedings the referred to representative again sought time for submission of the report, time was granted and the case was adjourned to 10.12.2020. Today representative of respondents submitted an office letter bearing No. 23283 dated 08.12.2020 wherein it has been written that no post in BPS-19 is vacant against which appellant could be adjusted however, in the last part of the letter the official has submitted that the applicant can be adjusted at her desired station if one of the lecturer in BPS-17 who is drawing salary against BPS-19 is transferred to some other collage. The report so furnished does not provide a workable solution of the issue. A course of long discussion and deliberation with the official representative of the department, as well as of the learned Deputy District Attorney was made during which a consensus was developed that the appellant who is handicapped, unmarried lady has to be adjusted in Peshawar subject to availability of BPS-19. Accordingly, the Tribunal directed the in post

08.12.2020

Appellant in person alongwith her counsel is present. Mr. Riaz Ahmad Paindakheil, Assistant Advocate General and Mr. Jehanzeb, Superintendent, for the respondents are also present.

The bench was not apprised regarding the vacant post in BPS-19 in the Government Girls Degree College, Hayatabad, Peshawar, where the appellant (handicapped) is seeking her adjustment. The representative present is seeking time to furnish information regarding the referred to post. In view of the physical disability of the appellant, he is directed to inform the bench about latest post by 1:00 P.M positively. After the long interval and resumption of proceedings the representative is seeking more time for making compliance of the Tribunals order. Time is granted directing him to positively provide the requisite latest status of the vacant post on 10.12.2020 before D.B.

(MIAN MUHAMMAD) MEMBER (EXECUTIVE) (MUHAMMAD JAMAL KHAN) MEMBER (JUDICIAL) 19.11.2020 Appellant with counsel present.

Muhammad Jan learned Deputy District Attorney alongwith Jehanzeb Superintendent for respondents present.

At the very outset appellant submitted that her case may kindly be decided in view of her disability. She further submitted that her posting order was issued on her promotion from BPS-18 to 19 but a vacant post is available in Government Girls Degree College Hayat Abad and she can be easily adjusted against the post, therefore, representative of respondents, present in court, is directed to apprise this Tribunal in respect of availability of the vacant post of BPS-19 and the adjustment of the appellant against that post. A request was made for adjournment by both the parties in order to produce record showing the availability of vacant post.

Adjourned to 08.12.2020 before D.B.

(Atiq ur Rehman Wazir)

Member (E)

(Rozina Rehman) Member (J) 27.10.2020

Appellant in person present.

Mr. Kabir Ullah Khattak learned Additional Advocate General alongwith Jehanzeb Superintendent and Zaki Ullah Senior Auditor for respondents present.

Reply on behalf of respondents No.1 to 4 submitted while representative of respondent No.5 states that he relies on the reply of respondents No.1 to 4. To come up for rejoinder, if any, and arguments on 06.11.2020 before D.B.

(Rozina Rehman) Member (J)

06.11.2020

Appellant is present in person. Mr. Kabirullah Khattak, Additional Advocate General and Mr. Zakiullah, Senior Auditor, for the respondents are also present.

Since copy of reply could not be delivered to the appellant, therefore, rejoinder could not be submitted today. The office is directed to hand over copy of reply to appellant. File to come up for rejoinder and arguments on 19.11.2020 before D.B.

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

(Muhammad Jamal Khan) Member (Judicial)



29.09.2020

Counsel for appellant and Addl. AG alongwith Inamul Haq, Assistant and Jehanzeb, Superintendent for the respondents present.

Representative of respondents No. 1 & 2 states that the requisite reply although has been prepared and sent for signature of the concerned respondent which has not been received back till date. He, therefore, requests for adjournment. Adjourned to 28.10.2020 before S.B.

Alongwith the appeal an application for suspension of impugned order dated 10.10.2018 has also been submitted. Notice of the application be also given to the respondents for the next date of hearing.

Chairman

M

06.08.2020

Mr. Imran Khan, Advocate for appellant is present.

The main focus of the arguments of learned counsel for the appellant was that she is a disable unmarried lady. Since assuming the charge of her post she has been transferred to various stations on acquisition of promotion to various grads. At last she was detailed by the Government at Government Girls Degree College Hayatabad but that detailment was cancelled by the Government of Khyber Pakhtunkhwa with the direction to resume the duties at their original stations, the departmental remedies available were exhausted but with no appropriate response. According to the learned counsel parents of the appellant are hailing from Peshawar and are residing as such within the territorial limits of District Peshawar therefore, the impugned order so issued by the Provincial Government, is liable to cancellation as it is in contravention of the posting transfer policy promulgated by the Khyber Pakhtunkhwa Government, according to the enactments on the subject where it has been ordained that an unmarried lady has to be posted within the District of her parents residence.

These are the bulging questions and issues raised by the learned counsel requiring adjudication in the light of law and rules on the subject therefore, the appeal is admitted for regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within ten days, thereafter, notices be issued to the respondents for written reply/comments. File to come up for written reply/comments on 21.08.2020 before S.B.

(MUHAMMAD JAMAL KHAN) MEMBER

Appellant in besited
Security & Plocess Fee

## Form- A

## FORM OF ORDER SHEET

Court of			
•			
e No	6340	/2020	

1S.No.	Date of order	Order or other proceedings with signature of judge
	proceedings	or other proceedings with signature of Judge
1	2	3
1	03/07/2020	The appeal of Mst. Safia Nageen resubmitted today by Imran Kha
_		Advocate may be entered in the Institution Register and put up to the
		Worthy Chairman for proper order please.
		REGISTRAR
-	•	This case is entrusted to S. bench for preliminary hearing to be pu
.		up there on 23107 2020
		Whi.
		CHAIRMAN
23.07	.2020	Appellant is absent. The legal fraternity is observing
		strike today therefore, no proceedings could be conducted.
		The case is adjourned to 06.08.2020. To come up for
		previous proceedings before S.B.
		(MUHAMMAD JAMAL KHAN)
		MEMBER
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The appeal of Mst. Safia Nageen received today i.e. 29-06-2020 by Imran Khan, Advocate is incomplete on the following score which is returned to his counsel for completion and resubmission within 15 days.

1. 1. 1.

- 1- Annexure-F of the appeal is illegible which may be replaced by legible/better
- 2- 1 more copies of appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1349 /S.T,

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Imran Khan Adv, Peshawar.

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

Service Appeal No	6340	//2020		
Safia Nageen	, , , . , . ,		(	Appellant)
	V E	RSUS		
Government of	Khyber	Pakhtunkhwa	through	Secretary
Higher Education	and oth	ers	(Res	pondents)

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S.No.	Description of Documents	Annex	Pages
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3.	Addresses of the Parties	1	8
4.	Application with affidavit		9-11
5.	Copies of CNIC and Service Card	Α	12-13
6.	Copy of regularization notification	В	14-16
7.	Copy of notification	C	17-21
8.	Copy of the promotion as well as	D	22-23
	transfer letter dated 10/10/2018		00 07
9.	Copy of Disability Certificate	E	84 -03
10.	Copy of letter dated 17/12/2019	F	26-27
11.	Wakalat Nama		28

Appellant

Through

Dated: 29/06/2020

Imran Khan

& Roeeda

Advocates High Court, Peshawar.

Cell: 0333-9410989

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

Service Appeal No. 63492020

Khyber Pakhtukhwa Service Trihunai Diary No. 29-6-202

Safia Nageen D/o Ahmad Jan R/o Dab Naguman, Post Office Nahaqi, Tehsil and District Peshawar.....(Appellant)

#### VERSUS

- 1. Government of Khyber Pakhtunkhwa through Secretary Higher Education, Archives and Libraries Department, Peshawar.
- 2. Director Higher Education, Khyber Pakhtunkhwa, Peshawar.
- 3. Government Girls Degree College Pabbi, District Nowshera through its Principle.
- 4. Government Girls Degree College Hayatabad through its Principle.
- 5. District Account Officer, Peshawar.....(Respondents)

APPEAL UNDER SECTION 4 OF KHYBER

PUKHTUNKHWA SERVICE TRIBUNAL ACT

1974, AGAINST THE IMPUGNED TRANSFER

ORDER DATED 10/10/2018, BY VIRTUE OF

Re-submitted to -day

WHICH THE APPELLANT HAS BEEN

TRANSFERRED FROM GGDC HAYATABAD

TO GGDC PABBI, NOWSHERA.



#### PRAYER IN APPEAL:

By accepting of this Service Appeal, that the impugned transfer order dated 10/10/2018 may kindly be declared as null and void, void-ab-initio and may also be set aside, and the appellant may kindly be allowed to continue his services at GGDC, Hayatabad, Peshawar, being a un-married and disable lady, in the best interest of justice.

Any other relief which has not been mentioned may also be granted in favour of appellant.

#### Respectfully Sheweth:

- 1. That the appellant is law abiding citizen of Pakistan and is the permanent resident of Dab Naguman, Post Office Nahaqi, Tehsil and District Peshawar. (Copies of CNIC and Service Card are attached as annexure "A").
- 2. That initially the appellant was appointed as Lecturer in Islamiyat in GGC Marghuz, Swabi on 01/11/2003.

(3)

- 3. That the service of the appellant was regularized on 12/10/2005 through notification by the respondent No. 1. (Copy of regularization notification is attached as annexure "B" whereas the appellant stood at Serial No. 98 of the list).
- 4. That the appellant was promoted from BPS-17 to BPS-18 on 16/05/2012. (Copy of notification is attached as annexure "C" whereas the appellant stood at Serial No. 102 of the list).
- 5. That the appellant was promoted to BPS-19 and transferred to Government Girls Degree College Pabbi, District Nowshera vide order dated 10/10/2018. (Copy of the promotion as well as transfer letter dated 10/10/2018 are attached as annexure "D" whereas the appellant stood at Serial No. 33 of the list).
- 6. That it is pertinent to mention here that the appellant is a disable lady. (Copy of Disability Certificate is attached as annexure "E").

(y)

- 7. That being a disable lady the appellant was allowed detaliment at Government Girls Degree College Hayatabad.
- 8. That the in pursuance of the direction of the Government of Khyber Pkahtukhw that detailment of the appellant and other allied staff was stood cancelled and they were directed to resume their duties at their original stations. (Copy of letter dated 17/12/2019 is attached as annexure "F" whereas the appellant stood at Serial No. 07 of the list).
- 9. That the appellant filed an appeal/representation against the transfer order dated 10/10/2018 to the respondent No. 1 wherein she requested that she may kindly be transferred to Peshawar being unmarried and disable lady.
- 10. That stipulated period has been passed so far, but the appeal/representation of the appellant has not been decided by the respondent No. 1.
- 11. That the appellant having no other adequate alternate remedy, but to approach this Hon'ble



Tribunal for redressal of her grievances, on the following grounds:

#### **GROUNDS:**

- A. That under the Appointment, Transfer and Posting

  Policy of the Government of Khyber Pakhtunkhwa

  an un-married Civil Servant has to be posted at the

  place where her parents are residing.
- B. That the parents of the appellant are residing at Peshawar and the appellant also residing with her parents.
- C. That the appellant is a disable lady and she cannot walk without crutches, so therefore being a cripple lady she is entitled to be posted at the place of her parents resident.
- D. That it is pertinent to mention here that there is no hostel facility at Government Girls Degree College Pabbi, District Nowshera.

That appellant will take other grounds at the time of Ε. arguments with the prior permission of this Hon'ble Tribunal.

It is, therefore, most humbly prayed that by accepting of this Service Appeal, that the impugned transfer order dated 10/10/2018 may kindly be declared as null and void, void-ab-initio and may also be set aside, and the appellant may kindly be allowed continue his services at GGDC. to Hayatabad, Peshawar, being a un-married and disable lady, in the best interest of justice.

Any other relief which has not been mentioned may also be granted in favour of appellant.

Appellant

Through

Dated: 29/06/2020

Imran Khan

Roeeda

Advocates High Court,

Peshawar.

#### BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE-TRIBUNAL, PESHAWAR

Service Appea	al No	o	/2020		
Safia Nageen	• • • • •			• • • • • • • • • • • • • • • • • • • •	(Appellant)
		. <b>V</b> E	RSUS	; ;	
Government	of	Khyber	Pakhtunkhwa	through	Secretary
Higher Educa	ition	and oth	ers	(Res	spondents)

#### **AFFIDAVIT**

I, Safia Nageen D/o Ahmad Jan R/o Dab Naguman, Post Office Nahaqi, Tehsil and District Peshawar, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

DEPÓNENT

Mob-0333-9286922



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

Service Appeal No	/2020		• .
Safia Nageen			(Appellant)
	VERSUS		
Government of Kh	yber Pakhtunkhwa	through	Secretary
Higher Education an	d others	(Re	spondents)

#### ADDRESSES OF THE PARTIES

#### **APPELLANT:**

Safia Nageen D/o Ahmad Jan R/o Dab Naguman, Post Office Nahaqi, Tehsil and District Peshawar.

#### **RESPONDENTS:**

- 1. Government of Khyber Pakhtunkhwa through Secretary Higher Education, Archives and Libraries Department, Peshawar.
- 2. Director Higher Education, Khyber Pakhtunkhwa, Peshawar.
- 3. Government Girls Degree College Pabbi, District Nowshera through its Principle.
- 4. Government Girls Degree College Hayatabad through its Principle.

5. District Account Officer, Peshawar.

Appellant

Through

Dated: 29/06/2020

Imran Khan

Roeeda

87.

Advocates High Court, Peshawar.

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

C.M. No/2020			
In		· · · · · · · · · · · · · · · · · · ·	:
Service Appeal No	_/2020		· · · · · · · · · · · · · · · · · · ·
			(A 11 1)
Safia Nageen <b>v</b>	Approximately and the second		[Appellant]
Government of Khybe	r Pakhtunkhwa	through	Secretary
Higher Education and ot	hers	(Res	pondents)

APPLICATION FOR SUSPENSION OF IMPUGNED ORDER DATED 10/10/2018

TO THE EXTENT OF TRANSFER, TILL THE FINAL DECISION OF THE MAIN SERVICE APPEAL.

### Respectfully Sheweth:

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



- That the balance of convenience also lies in favour of appellant.
- That if the operation of the impugned order dated 10/10/2018 to the extent of transfer is not suspended then the appellant will suffer irreparable loss.

It is, therefore prayed that on acceptance of this application, the operation of the impugned order dated 10/10/2018 to the extent of transfer, may kindly be suspended, till the final decision of the main Service Appeal.

Appellant

Through

Dated: 29/06/2020

Imran Khan

Roeeda

Advocates High Court, Peshawar.

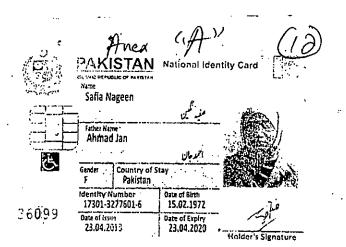
## TRIBUNAL, PESHAWAR

C.M. No/2020			
In		: •	
Service Appeal No	/2020 :-		
Safia Nageen	······································		(Appellant)
V E	RSUS		
Government of Khyber	Pakhtunkhwa	through	Secretary
Higher Education and other	ers	(Res	pondents)

#### **AFFIDAVIT**

I, Safia Nageen D/o Ahmad Jan R/o Dab Naguman, Post Office Nahaqi, Tehsil and District Peshawar, do hereby solemnly affirm and declare on oath that the contents of the accompanying Application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

Mic - 17201-3277601-6 1906- 8227-9286922



ستنل عنه نامگان، داک هاز تحق، دب، تحسیل دهل

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ممشده كارة عض پر قريبي ليشر بكس مين وال ديس



## RNMENT OF KHYBER PAKHTUNKI EDUCATION DEPARTMENT

SERVICES CARD

Personal No: 00237602

Name:

Safia Nageen

Designation: Asstt. Professor

institute:

Govt Girls Degree College

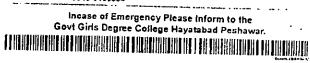
Hayatabad Peshawar.



CNIC No: 17301-3277601-6 Date of Expiry Dec 2

Address: Village Dab Naguman P/o Nahqi

Tehsil & District Peshawar.



Annous

"B"

(14)

#### GOVERNMENT OF N.W.F.P. HIGHER EDU: , ARCHIVES & LIBRARIES DEPTT: .

Dated Pesh: the Oct: 12, 2005.

#### NOTIFICATION.

No.SO(FC&AB) HE/1-3/05/Regularization of contract Lec:. Pursuant to Government of NWFP Civil Servants (Amendment) Act, 2005, read with Govt: of NWFP, Establishment & Administration Department (Regulation Wing) Notification No.SO(Regulation-IV) (E&AD)1-13/2005 dated 10-8-2005, the Competent Authority is pleased to regularize the services of the following contract Lecturers (B-17) from the date of their appointments as mentioned against each:-

S.#   N	Name & Designation.	Name of College	Date of Regularization.
1. S	Shahzia Noreen, Lecturer in Zoology.	GGC No.1, Abbottabad.	02/08/2002
	Shamshad Begum Lecturer in English.	GGC No.2 D.I.Khan.	02/08/2002
	Hafiza Ali Lecturer in Zoology.	GGC Parachinar.	02/08/2002
	Zainab Bibi Lecturer in Computer Science.	GGC. Mardan,	03/08/2002
	Zubeida Khatoon Lecturer in English.	GGC, Kliwaza Khela	03/08/2002
	Zubia Akbar Lecturer in English.	GGC, Nawan Sheher.	05/08/2002
		GGC No.2 D.I.Khan.	06/08/2002
	Bibi Sakina, Lecturer in English.	GGC Taimergara.	07/08/2002
	Nellam Lecturer in Economics.	GGC No.1, Abbottabad.	07/08/2002
	Anecba Raz Lecturer in English.	GFC(W) Peshawar.	08/08/2002
	Jsara Anwar Lecturer in English.		08/08/2002
	Amina Begum, Lecturer in Law.	GGC Marghuz.	
	Azra Lecturer in Economics.	GGC Dargai	08/08/2002
	Shahzia Bahar Lecturer in Statistics.	GGC, Dargai.	08/08/2002
	Naghma Yasınen Lecturer in Maths.	GGC, Lakki.	08/08/2002
	Shagufta Naz Lecturer in Statistics.	GGC Manschra.	10/08/2002
	Ghosia Naz Lecturer in Pak Study.	GGC, Timergara.	13/08/2002
17. i	Rizwana Fayaz, Lecturer in Maths.	GGC, Manschra.	13/08/2002
18.	Noshad Bibi, Lecturer in Zoology.	GGC No.1, D.I.Khan.	13/08/2002
	Shehla Ambreen Lee: in Comp. Science.	GGC No.1, D.I.Khan.	13/08/2002
	Tanveer Bibi Lecttifer in Pak Study.	GGCLekkin	13/08/2002
	Robina Begum Lecturer in English.	GGC Parachinar.	14/08/2002
	Abida Gul Lecturer in Economics.	GGC Parachinar.	15/08/2002
	Fozia Norcen Lecturer in English.	GGC, Bannu.	16/08/2002
	Nasim Muntaz Lecturer in Pak Study.	GGC Pirpai.	17/08/2002
	Nasreen Begum Lecturer in Maths.	GGC, Mardan.	17/08/2002 .
26.	Azmat Gul Lecturer in Maths.	GGC, Marghuz.	17/08/2002
+	S.Rabila Ahmad Lecturer in Pak Study.	GGC, Dargai.	17/08/2002
27.	Bindia Irum, Lecturer in Maths.	GGC Nawansheher.	17/08/2002
28.		GGC Manki.	19/08/2002
29.	Nadia Ali Shah Lecturer in English.	GGC Manki,	19/08/2002
30.1	Bibi Asima, Lecturer in Maths.		19/08/2002
31.	Seema Beguin Lecturer in Pak Study.	GGC Manki.	
32.	Zeenat Yasmeen Leek in Home Economics.	GGC Timergara.	19/08/2002
33.	Saima Sadiq, Lecturer in Economics.	GGC, Haripur.	19/08/2002
34.	Robina Malik, Lecturer in Maths.	GGC No.1, D.J.Khan.	19/08/2002
35.	Saba Farid, Lecturer in English.	GGC, Pirpai, (Nowshera).	20/08/2002
36.	Shabana Shahcen, Lecturer in Maths.	GGC, Haripur.	20/08/2002
ر 37	Sughra Bibi, Lecturer in Pak Study.	GGC, Nawanshehr.	20/08/2002
38.	Afia Sadat, Lecturer in Home Economics.	GGC No. 1, D.I.Khan.	20/08/2002
39,	Noreen Azfar, Lecturer in English.	GGC Haripur.	21/08/2002
40.	Shazia Nawab, Lecturer in English.	GGC, No. 1, D. I.Khan,	22/08/2002
41.	Norcen Bibi Lesturer in Comp. Science	GGC. Kohat.	24/08/2002
42.	Rahat Bathool, Lecturer in Urdu.	GGC, Bannu.	24/08/2002
431	Nasreen Bibi Lecturer in Stats.	GGC, Bannu.	24/08/2002
44)	Saima Najceb, Lecturer in English.	GGC, Nawansheher.	26/08/2002
45:	Humera Ahmad, Lecturer in English.	GGC Maneri, (Swabi).	29/08/2002
46.	Laila Noor, Lecturer in Physics.	GGC Mardan.	29/08/2002
		GGC, Marghuz,	29/08/2002
47	Beena-Afsheen, Lecturer in States.		
48;	Naila Shabnam, Lecturer in Physics.	GGC, Thana.	29/08/2002
49!	Lala Rukh, Lecturer in Home Economics.	GGC, Manki (Swabi).	30/08/2002
50	Bibi Fatima, Lecturer in Economics.	GGC, Lakki.	31/08/2002
51	Tasleem Bano, Lecturer in Islamiyat.	GGC, Manki,	01/09/2002
52.	Hina Mehmood, Lecturer in Biology.	GGC, Khwaza Khela.	01/09/2002
53!	Saima Mahayud Din, Lecturer in Physics.	GGC, Haripur.	01/09/2002

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/	1	<b>/</b> _	
(	/	)	
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	54.	Farkhanda Nizam, Lecturer in Economics.	GGC Marghuz.	02/09/2002
		Nazish Jehan, Lecturer in Pol: Science.	GGC, Marghuz.	02/09/2002
$\vdash$		S.Mobine Qadri, Lecturer in Economics.	GGC, Kohat.	02/09/2002
-	57.	Rahila Tabassum Lecturer in Economics.	GGC, Bannu.	02/09/2002
		Samina Begum, Lecturer in Islamiyat.	GGC, Chitral.	02/09/2002
		Rehana Parveen, Lecturer in Physics.	GGC Lakki Marwat.	02/09/2002
	60.	Sajida Ambreen, Lec: in Islamic Education.	GGC Parachinar.	07/09/2002
-	61.	Bazgha Juli, Lecturer in Botany.	GGC Maneri (Swabi).	09/09/2002
-	62.	Saima Shams, Lecturer in Economics.	GGC Nawan Shehr.	09/09/2002
	63.	Farzana Afridi, Lecturer in Botany.	GGC Parachinar.	19/09/2002
	<del>`</del>		GGC Pirpai (Nowshera).	20/09/2002
-	64.	Safia Begum, Lecturer in Economics.	GGC Karak.	21/09/2002
	65.	Farhat Yasmeen, Lecturer in Statistics.	GGC, Parachinar.	23/09/2002
<u> </u>	66.	Robina Naz, Lecturer in Physics.		26/09/2002
	67.	Saima Jabeen, Lee: in Home Economics.	GGC, Bannu.	
	68.	Sarwat Wadood, Lee: in Home Economics.	GGC Karak.	27/09/2002
	69.	Hafiza Sadia Kalsoom! Lec: in Islamiyat.	GGC No.1, D.I.Khan.	18/10/2002
	70.	Sadia Ishtiqq, Lecturer in Islamiyat.	GGC Mancri (Swabi).	28/10/2002
	71.	Tahira Gilllani, Lecturer in Physics.	GGC Marghuz.	31/10/2002
	72.	Nusrat Riaz, Lecturer in Physics.	GGC Haripur.	01/11/2002
	73.	'Alia Bashir, Lecturer in Physics.	GGC Mansehra.	01/11/2002
	74.	Fozia Anjum, Lecturer in Pol. Science.	GGC No.2, D.I.Khan.	01/11/2002
-	75.	Neclam Kalsoom Lecturer in Pol. Science.	GGC Mansehra.	04/11/2002
		Humera Naz, Lecturer in English.	GGC Havelian.	15/11/2002
-	77.	Humma Iqbal, Lecturer in Chemistry.	GGC No.2, Abbottabad.	06/01/2003
$\vdash$	78.	Rukhsana Afridi, Lecturer in Chemistry.	GGC Parachinar.	06/01/2003
-		Nazia Khawaja, Lecturer in Chemistry.	GGC Nawanshelu.	06/01/2003
$\vdash$	80.	Nowsheen Jamal, Lecturer in Chemistry.	GGC, Lakki.	27/01/2003
}—	81.	Naila Nazneen, Lecturer in Chemistry.	GGC Taimergara.	01/02/2003
-	01.	Alia Aslam, Lecturer in Chemistry.	GGC Manki Swabi.	11/01/2003
		ISajida Bibi, Lecturer in Chemistry.	GGC Khawaza Khela.	04/01/2003
<b> </b> -	83.	11 Sajida Bibi, Lecturer in Chemistry.	GGC Karak.	29/01/2003
<u> </u>	84.	Somia Khattak, Lecturer in Chemistry.	GGC, No. 1, D.I.Khan.	04/01/2003
<u> </u>	85.	Nadia Ashraf. Lecturer in Political Science.		07/02/2003
┖		Sumera Gul, Lecturer in Urdu.	GGC, Nowshera.	
	87.		GGC, Maneri,	07/02/2003
<u>-</u>	88.		GGC, Nawanshehr.	16/12/2003
. Г	89.		GGC, Mansehra.	16/02/2003
	90.	Tahira Bibi, Lecturer in Urdu.	GGC Lakki Marwat.	07/02/2003
	91.	Fozia Memoon Khattak, Lecturer in Urdu.	GGC, D.1.Khan.	17/02/2003
r	92.	Sarwat Begum, Lecturer in Urdu.	GGC, Thana.	01/02/2003
<u> </u>	93.		GGC, Parachinar.	17/02/2003
<u> </u>	94.		GGC, Timergara.	18/02/2003
-	95.		GGC, Thana.	01/04/2003
<u>_</u> `	96.		GGC, Swat.	27/09/2003
7  -	/ 97	Scema Gul, Lecturer in Pol: Science.	GGC, Chitral.	01/10/2003
	98.		GGC Marghuz (Swabi).	01/11/2003
<b>∽</b> ♭	XX 599		GGC, Taimergara.	11/10/2004
$\mathcal{A}$	100		GGC No.2, D.I.Khan.	25/09/2004
∕  -			GGC Chitral.	27/09/2004
-	107			24/09/2004
<u> </u> -	102		GGC, Lakki.	26/03/2004
-	103	4. Rahima Bibi, Lecturer in Physics.	GGC, Dargai.	27/09/2004
-	104	5. Rohila Sayel, Lecturer in Pak Study.	GGC Khawaza Khela.	01/10/2004
-	10:	J. Norma Sayor, Lecturer in Pak Study.	GGC No.2, D.I.Khan.	25/09/2004
<u> </u>		6. Naila Atab, Lecturer in Pak Studies.	GGC, Chitral.	04/10/2004
, <b> </b>	10	7. Zakia Minhas, Pak Studies.		09/10/2004
.  -		8. Neelina Farced, Lect in Home Economics.	GGC, Marghuz (Swabi).	01/10/2004
Ļ		9. Nazia Begum, Physics.		01/11/2004
1		0. Saira Hamid, Lecturer in Maths.	GGC, Taimergara.	
ļ		1 Saima Almas, Lecturer in Maths.	GGC, Hangu.	15/10/2004
· [		2. Gul Nasrin, Physics.	GGC, Nawanshehr.	03/11/2004
[		3: Shabana Kausar, Lecturer in Physics.	GGC, Havelian.	11/10/2004
. [		14: Farzana Gulnaz, Lecturer in Chemistry.	GGC, Marghuz.	22/11/2004
ſ		<ol><li>Shahana Jehan, Lecturer in Chemistry.</li></ol>	GGC, Chitral.	01/12/2004
	1.	<ol><li>Shabana Bibi, Lecturer in Chemistry.</li></ol>	GGC, Battagrain.	12/11/2004
		17. Shabnam Zaman, Lecturer in Law.	GGC No.2, Abbottabad.	02/12/2004
				24/11/2004
.	1	18. Shahi Sultan, Lecturer in Statistics.	GGC, Taimergara.	
	1		GGC, Taimergara. GGC, Lakki Marwat.	08/11/2004
	1	<ul><li>18. Shahi Sultan, Lecturer in Statistics.</li><li>19. Safia Balqees, Lecturer in Statistics.</li></ul>		
	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	<ul> <li>18. Shahi Sultan, Lecturer in Statistics.</li> <li>19. Safia Balqees, Lecturer in Statistics.</li> <li>20. Shaista Bibi, Lecturer in Statistics.</li> </ul>	GGC, Lakki Marwat. GGC, Havelian.	08/11/2004
	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	<ul> <li>18. Shahi Sultan, Lecturer in Statistics.</li> <li>19. Safia Balqees, Lecturer in Statistics.</li> <li>20. Shaista Bibi, Lecturer in Statistics.</li> <li>21. Aisha Bibi, Lecturer in Statistics.</li> </ul>	GGC, Lakki Marwat. GGC, Havelian. GGC. Haripur.	08/11/2004 26/11/2004 24/11/2004
	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	<ul> <li>18. Shahi Sultan, Lecturer in Statistics.</li> <li>19. Safia Balqees, Lecturer in Statistics.</li> <li>20. Shaista Bibi, Lecturer in Statistics.</li> </ul>	GGC, Lakki Marwat. GGC, Havelian. GGC. Haripur. GGC. Marghuz,	08/11/2004 26/11/2004

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	·		11/11/2004
124.	Wahida Khan, Lecturer in English.	GGC, Karak	
	Mchreen Shahzadi, Lecturer in English.	GGC Dargai.	01/12/2004
125.	Mehreen Shahzadi, Lecturer in English	GGC, Kohat.	19/11/2004
126.	Safia Syed, Lecturer in English	GGC, Chitral.	01/12/2004
127.	Aisha Bibi, Lecturer in English	GGC, Cittal.	08/11/2004
128.	Saima Siddig, Lecturer in English.	GGC, Lakki Marwat.	
129.	Total Colors	GGC No.1, Abbottabad.	23/11/2004
	To a selection	GGC Marghuz (Swabi).	10/11/2004
130.	Kaukao Huma, Lecturer in Enghan.	GGC Lakki Marwat.	15/12/2004
131.	Rubaba, Lecturer in Biology.	GGC Battagram.	10/12/2004
132.	Rukhsana Naz, Lecturer in Biology.		01/01/2005
133.	Somia Naz, Lecturer in Biology.	GGC Chitral.	01/01/2005
134	. 72	GGDC Hangu.	
	Ti-company (OC	GGDC Khawaza Khela Swat.	01/01/2005
135	lanira Bano, Lecturel III Leonomics	GGDC No.1, Abbottabad.	01/01/2005
136	Syeda Shawana Ghazi, Lec: in Economics.		01/02/2005
. 137	Zaib-un-Nisa, Lecturer in Urdu.	GGC Battagram.	07/02/2005
138	T):-1	GGC Karak.	1 0710212003
. 130	), Lama Onario, 200.		

Their regularization is subject to the following conditions:-

- Institution/post specific nature of their posting stands dispensed with. Pursuant to Rule.10 of Civil Servants Act 1973, they will have right of transfer from one station to another as per provisions of posting/Transfer policy of the Provincial Government.
- They will have all rights/privileges contained in NWFP Civil Servants Act, 1973 with all amendments made therein including NWFP Civil Servants (Amendment) Act. 2005 and Rules made there under.
- NWFP Civil Servants (Efficiency & Discipline) Rules, 1973, NWFP Govt. Servants (Conduct) Rules-1987 and NWFP Removal from Service (Special Powers) Ordinance 2000 will be applicable to them in disciplinary cases.
- d. They shall, for all intents and purposes be Civil Servants, except for the purpose of Pension and Gratuity. In lieu of the same, they shall be entitled to receive Contributory Provident Fund. For the said fund 10% by the Civil Servant concerned in the prescribed manner. Provided further that, in the event of death of the civil servant, whether before or after retirement, his family shall be entitled to receive the said amount, if it has already not been received by concerned deceased civil servant.

### SECRETARY TO GOVT, OF NWFP, HIGHER EDUCATION, DEPARTMENT.

## No.SO(FC&AB)HE/1-3/05/Regularization of contract Lec:.

Dated Pesh: the Oct: 12, 2005.

Copy forwarded to the :-

1. Accountant General, NWFP, Peshawar.

Director, Higher Education, NWFP, Peshawar.

- 3. Director Recruitment, NWFP Public Service Commission, Public Service Commission, Bungalow No. 186, P-I, Phase-IV, near Scouts Building, Hayatabad, Peshawar.
- District/Agency Accounts Officer concerned.
- Principals Govi: Give Colleges concerned.
- Manager, Gover Prod of tess, NWFP, Peshawar.
- P.S. to Chief Scorete SWFP, Peshawar.
- 8. P.S. to Minister for Education, NWFP, Peshawar.
- 9. P.S. to Secretary, Establishment & Admn. Deptt:, NWFP, Peshawar.
- 10. P.S. to Secretary, Finance Department, NWFP, Peshawar.
- 11. P.S. to Sceretary, Higher Education, NWFP, Peshawar.
- 12. Section Officer (FATA), Education Deptt:, Governor's Sectt:, Warsak Road, Peshawar.
- 13. Section Officer (General), Higher Edu: NWFP, Peshawar.
- 14. P.A. to Additional Scoretary, Higher Edu: NWFP, Peshawar.
- 15. P.A. to Dy: Secretary (Admn.), Higher Edu: NWFP, Peshawar.
- 16. Officers concerned.

SECTION OFFICER(FC&AB)







#### GOVERNMENT OF KHYBER PAKHTUNKHWA HIGHER EDUCATION, ARCHIVES & LIBRARIES DEPARTMENT

Dated Peshawar: the 16<sup>th</sup> May, 2012.

#### NOTIFICATION

No. SO(FC)HE/13-2/10/Promotion BS-17 TO BS-18. The Competent Authority on t recommendation of the Provincial Selection Board (PSB) has been pleased to promote t following Female Lecturers (BS-17) to the post of Assistant Professors (BS-18) on regular ba of College cadre of Higher Education Department with immediate effect, and to post them the Colleges noted against each. They will remain on probation for a period of one year terms of Section 6(2) of Khyber Pakhtunkhwa Civil Servant Act, 1973 read with Rule-15 (1) Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules. 1989.

S.#	Name & Designation	Posted as A/P at	Remarks
1.	Ms. Shazia Gul, Lecturer in Psychology, GGC No.1 Abbottabad		Service placed at the disposal of FATA Directorate
2.	Ms. Tahira Sultana, Lecturer in Maths, on deputation to AJK	GGC No.1 DIKhan	A.V.P (subject to actualization of promotion in her own cadre
3.	Ms. Shagufta Begum, Lecturer in Physics, GPGGC Kohat	GPGGC Kohat	A.V.P
4.	Ms. Fehmida Gul, Lecturer in Chemistry, GPGGC Haripur	GPGGC Haripur	A.V.P
5.	Ms. Shumaila Firdus, Lecturer in Botany, GGC No.1 Abbottabad	GGC Battagram	A.V.P
6.	Ms. Faiza Bibi, Lecturer in Pak Study, GGC KTS, Haripur	GGC KTS, Haripur	A.V.P
7.	Ms. Tahira Gul, Lecturer in History, GCGC Peshawar	GGC Karak	A.V.R
8.	Ms. Naghma Sabohi, Lecturer in Urdu, GPGGC Haripur	GPGGC Haripur	A.V.P
9.	Ms. Musarat, Lecturer in Urdu, GGC No.2 Abbottabad	GGC KTS Haripur	A.V.P
10.	Ms. Afsheen Hamid, Lecturer in Stats, on deputation to Federal Govt.	GGC Dargai (Malakand)	A.V.P (subject to actualization of promotion in her own cadre
11.	Ms. Shahnaz Musarat, Lecturer in Maths, GGC Karak	GGC Karak	A.V.P
12.	Ms. Nargis Sani, Lecturer in Maths, GGC Dargai, Malakand	GGDC Dargai (Malakand)	Vice. No.14 of below adjustment
13.	Ms. Humaira Shuja, Lecturer in Pol. Science, GFC (w) Peshawar	GGC Panj Pir (Swabi):	A.V.P
14.	Ms. S. Nasira Zahid, Lecturer in Zoology, GGC Gulshan Rehman Colony Peshawar	GGC No.1 Charsadda	A.V.P
15.	Ms. Fatima Jafri, Lecturer in English, GGC Parachinar		Service placed at the disposal of FATA Directorate

			·
16	Islamiyat, GGC S.Sharif Swat	GGC S.Sharif Swat	A.V.P
17.	Ms. Maroof Jan, Lecturer in Computer Science, GCGC		Service placed at the disposal of FATA
18.	Peshawar Ms. Shahida Parveen, Lecturer in	GGC Surrani, Bannu	Directorate
19.	Pashto, GFC (w) Peshawar		A.V.P
19,	Ms. Shaheen Akhtar, Lecturer in Physics, GFC (w) Peshawar	GGC Mathra, Peshawar	Vice S.No.62 of below
20.	Ms. Saeeda Begum, Lecturer in	GGC No.2 Charsadda	adjustment A.V.P
21.	Urdu, GGC Pabbi, Nowshera Ms. Rugia, Lecturer in Physics,		
	GGC Chaghar Matti, Peshawar	GGC Chaghar Matti, Peshawar	Vice S.No.64 of below
22.	Ms. Zubda-Tun-Nisa, Lecturer in	GPGGC Kohat	adjustment A.V.P
	Stats, GGC Gulshan Rehman Colony Peshawar		
23.	Ms. Shehla Ambreen, Lecturer in	GGC No.2 DIKhan	`A.V.P
24.	Computer Sc. GGC No.2 DIKhan Ms. Hafiza Sadia Kalsoom,		
2.11	Lecturer in Islamiyat, GGC No.1 DIKhan	GGC Tank	A.V.P
25.	Ms. Afia Sadaat, Lecturer in H. Economics, GGC No.1 DIKhan	GGC No.1 DIKhan	A.V.P
26.	Ms. Nasreen Bibi, Lecturer in Stats, GPGGC Haripur	GPGGC Haripur	A.V.P
27.	Ms. Aniba Raza, Lecturer in English, GGC No.1 Abbottabad	GGC Mankarai, Haripur	A.V.P
28.	Ms. Bibi Fatima, Lecturer in Economics, GGC Lakki Marwat	GGC Lakki Marwat	Vice S.No.26 of below
29.	Ms. Bazgha Juli, Lecturer in Botany, GGC No.1 Abbottabad	GGC No.1 Abbottabad	adjustment A.V.P
30.	Ms. Noreen Azfar, Lecturer in Psychology, GGC Nowshera	GGC Nowshera	A.V.P
31.	Ms. Hafiza Ali, Lecturer in Zoology, GGC Parachinar		Service placed at the disposal of FATA Directorate
32.	Ms. Hina Mehmood, Lecturer in Botany, GGC Sheikh Maltoon, Mardan	GGC Sheikh Maltoon, Mardan	A.V.P
33.	Ms. Lala Rukh, Lecturer in H. Economics, GPGGC Kohat	GPGGC Kohat	A.V.P
34.	Ms. Farhat Yasmin, Lecturer in Stats, GCGC Peshawar	GGC Karnal Sher Killi Swabi	A.V.P
35.	Ms. Rahila Tabassum, Lecturer in Economics, GPGGC Bannu	GPGGC Bannu	Vice S.No.22 of below adjustment
36.	Ms. Saima Sadiq, Lecturer in Economics, GGC No.2 Mansehra	GGC No.2 Mansehra	Vice S.No.38 of below adjustment
37.	Ms. Farzana Afridi, Lecturer in Botany, GGC Dara Adma Khel		Service placed at the disposal of FATA  Directorate
38.	Ms. Shamshad Bano, Lecturer in Economics, GGC No.2 DIKhan	GGDC No.2 D.I.Khan	A.V.P
39.	Ms. Noreen Bibi, Lecturer in Computer Sc. GPGGC Kohat	GPGGC Kohat	A.V.P
40.	Ms. Nazia Khawaja, Lecturer in Chemistry, GGC Nawanshehr, A/Abad	GGC Sarai Saleh	AVP
41.	Ms. Yusra Anwar, Lecturer in English, GFC (w) Peshawar	GGC Panj Pir (Sawabi)	A.V.P
42.	Ms. Fozia Noreen, Lecturer in English, GPGGC Bannu	GPGGC Bannu	A.V.P

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43.	Ms. Safia Begum, Lecturer in Economics, GGC Nowshera	GPGGC Mardan	Vice S.No.42 of below adjustment
44.	Ms. S. Mobeena Qadri, Lecturer in Economics, GGC Nawanshehr, A/Abad	GGC Nawanshehr	A.V.P
45.	Ms. Zainab Bibi, Lecturer in Computer Sc. GGC Lakki Marwat	GGC Lakki Marwat	A.V.P
46.	Ms. Sajida Ambrin, Lecturer in Islamiyat, GGC Dara Zinda		Service placed at the disposal of FATA  Directorate
47.	Ms. Rahila Akhtar, Lecturer in Islamiyat, GGC S.Sharif Swat	GGC S. Sharif Swat	A.V.P
48.	Ms. Farhat Bibi, Lecturer in Islamiyat, GGC No.1 Abbottabad	GGC Sarai Saleh, Haripur	A.V.P
49.	Ms. Shazia Nawab, Lecturer in English, GGC No.1 DIKhan	GGC No.1 DIKhan	A.V.P
50.	Ms. Amna Begum, Lecturer in Law, GPGGC Mardan	GPGGC Mardan	A.V.P
51.	Ms. Naseem Mumtaz, Lecturer in Pak Study, GGC Lund Khawar, Mardan	GGC Lund Khawar, Mardan	Already occupied by her
52.	Ms. Alia Bashir, Lecturer in Physics, GGC No.1 Abbottabad	GGC No. 1 Abbottabad	A.V.P
53.	Ms. Saima Mohyd Din, Lecturer in Physics, GPGGC Haripur	GPGGC Haripur	A.V.P
54.	Ms. Naila Nazneen, Lecturer in Chemistry, GGC No.2 Abbottabad	GGC Nawanshehr, Abbottabad	A.V.P
55.	Ms. Nagina, Lecturer in Chemistry, GGC Maneri, Swabi	GGC Maneri, Swabi	A.V.P
56.	Ms. Nosheen Jamal, Lecturer in Chemistry, GGC No.1 DIKhan	GGC No.1 D.I.Khan	Ä.V.P
57.	Ms. Alia Aslam, Lecturer in Chemistry, GGC Gulshan Rehman Colony Peshawar	GGC No.2 Charsadda	A.V.P
58.	Ms. Tahira Gilani, Lecturer in Islamiyat, GGC No.1 DIKhan	GGC No.1 DIKhan	A.V.P
59.	Ms. Sadia Ishtiaq, Lecturer in Islamiayt, GGC Takht Bhai, Mardan	GGC Takht Bhai, Mardan	A.V.P
60.	Ms. Humaira Ahmad, Lecturer in English, GGC Chaghar Matti, Peshawar	GGC Chaghar Matti, Peshawar	: Vice S.No.4 of below adjustment
61.	Ms. Seema Begum, Lecturer in Pak Study, GGC Marghuz, Swabi	GGC Marghuz, Swabi	A.V.P
62.	Ms. Sarwat Wadood, Lecturer in H. Economics, GGC Karak	GGC Karak	Voice S.No.19 of below adjustment
63.	Ms. Robina Malik, Lecturer in Maths, GGC No.1 DIKhan	GGC No.1 DIKhan	A.V.P
64.	Ms. Swaleha Molvi, Lecturer in Islamiyat, GGC S.Sharif Swat	GGC Kanju, Swat	A.V.P
65.	Ms. Rizwana Fayyaz, Lecturer in Maths, GGC No.2 Abbottabad	GGC Sarai Saleh, Haripur	Vice S.No.47 of below adjustment
66.	Ms. Rahat Batool, Lecturer in Maths, GGC No.1 DIKhan	GGC No.2 DIKhan	A.V.P
67.	Ms. Nasreen Begum, Lecturer in Maths, GGC Lund Khawar, Mardan	GGC Lund Khawar, Mardan	A.V.P
68.	Ms. Fozia Anjum, Lecturer in Pol Science, GPGGC Kohat	GGC Karak	Already occupied by her
69.	Ms. Nadia Ali Shah, Lecturer in English, GGC Manki, Swabi	GGC Manki, Swabi	Vice S.No.09 of below adjustment

Study GGC Ohazi, Haripur   A.V.P.	Suley, GGC Ghazi, Haripur   A.V.P.	\[ \tag{-}	70. Ms. Tanveer Ribi Laid	<del></del>	_
MS, Uzma Qamar, Lecturer in Urdu, GGC Nowshera	71. Ms. Bazia Naz., Lecturer in Urdu, GGC Nowshera GGC Nowshera Urdu, GGC Nowshera Lecturer in Urdu, GGC Ms. Naveela Khanum, Lecturer in Urdu, GGC Jamrud.  72. Ms. Naveela Khanum, Lecturer in Urdu, GGC Jamrud.  73. Ms. Naveela Khanum, Lecturer in English, GGC Dargai, Malakand Directorate Ms. Salai Nova. Lecturer in Zoology, GGC Pabbi, Nowshera GGC Chaghar Matti, Peshawar Peshawa		1 - 15 Aut VOOL DIDI   Printar in 1	Pak GGC Ghazi, Haripur	AVD
Crain, GeC Nowshera   GeG C Haripur   A.V.P	Creating Color Nowshera   A.V.P.		71. Ms. Uzma Oamar Leatures		A.v.P
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	112		GGC Nowshera	A.V.P
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Ms. Rohila Sayal, Lecturer in P Study, GGC Gulshan Rehman	Pak GGC Thana, Mala	kand
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123. Ms. Shabana Kausar, Lecturer in Physics, GGC No.2 Abbottabad	n GGC N.2 Abbotta	bad A 1/2
124. Ms Rukhsana Na- T		A.V.P
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133.	Physics, GGC Maneri, Swabi			
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167	Ms, Uzma Nasim, Lecturer in	GPGGC Kohat	A.\	·····
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158.	Ms. Noumana Amber, Lecturer in	GGC Tank	Λ.	V ,1°
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167.	Ms. Shumaila Barlas, Lecturer in	GGC KTS, Haripur	^	V.P
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168		GGC Mandan, Bannu	\	V.P
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12.	Ms. Humera Nosheen, Lecturer in	GGC Pir Pai, Nowshera	
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13.	Ms. Sajida Bibi, Lecturer in	GGC Dargai, Malakand	V' C
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16.	Ms. Zahida, Sherin, Lecturer in		above
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17.	Ms. Salma Bangash, Lecturer in	GGC Hangu	
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4.	Ms. Shabana Iftikhar, Lecturer in	GGC Mandan, Bannu	Vice S.No.125
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5.	Ms. Nazia Mehtab, Lecturer in	GGC Mandan, Bannu	Vice S.No.149
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27.	Ms. Adila Tariq, Lecturer in Pak	OCC BARRI Mar Var	above
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28.	Ms. Nadia Nazneen, Lecturer in H.	GGC Lakki Mai wat	above
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30.	Ms. Afia Ilyas, Lecturer in	GPGGC Haripur	A.V.P
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31.	Ms. Alia Rafique, Lecturer in Pak	GPGGC Haripur	Vice S.No.04
	Study, GPGGC Haripur (working	'	above
	against BS-18)	<u>L</u>	
32.		GGC No.2 Abbottabad	Vice S.No.09
34.	Urdu, GGC No.2 Abbottabad		above
	(working against BS-18)		
		GGC Havellian	Vice S.No.89
33.	Ms. Sarqa Ratti, Lecturer in ordi,		above
	GGC Havellian (working against		
<u>-</u> -	BS-18)	GGC Havellian	Vice S.No.152
34	Ms. Hira Gul, Lecturer in Maths,	OGC Haverrian	above
l	GGC Havellian (working against		40010
	BS-18)	GGC Nawanshehr, Abbottabad	Vice S.No.40
35	. Ms. Faria Ashraf, Lecturer in	GGC Nawansnem, Abbottabad	above
	Computer Sc. GGC Nawanshehr		400 40
	(working against BS-18)	CDCCC II	A.V.P
36	6. Ms. Shazia Ameer, Lecturer in	GPGGC Haripur	A. V.1
1	Physics, GGC No.1 Mansehra		
\ <u>.</u>	(working against BS-18)		71' CNI- 0
3		GGC No.1 Mansehra	Vice S.No.9
	History, GGC No.1 Mansehra		above
	(working against BS-18)		
7	8. Ms. Shaista Rani, Lecturer	GGC No.2 Mansehra	Vice S.No.3
'	Islamiyat, GGC Ghazi, Haripur		above
	(under transfer to GGC No.2		
	Mansehra against BS-18)		
	19. Ms. Bibi Nabila Afsar, Lecturer in	GGC No.2 Mansehra	Vice S.No.1
3	Physics, GGC No.2 Mansehra		above
	(working against BS-18)		
.		GCGC Peshawar	Vice S.No.1
4	40. Ms. Sadia Sadaf, Lecturer in English, GGC No.2 Charsadda		above
	English, GGC No.2 Charsadda	i i	
	(working against BS-18)	GGC Sheikh Maltoon, Marda	n A.V.P
	41. Ms. Zill-e-Huma, Lecturer in	GGC GHORAI Franciscus, 1232 das	
	Computer Sc, GGC No.2		
	Charsadda (working against BS	>-	
	18)	GGC Nowshera	Vice S.No
	42. Ms. Nighat Seema, Lecturer in	GOC Nowshera	above
	Economics, GPGGC Mardan		1.
	(working against BS-18)		4 7 7 7
	43 Ms. Rukhsana Bibi, Lecturer in	GPGGC Haripur	A.V.P
	Physics, GGC Sarai Saleh, Harip	úr	
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44.	Ms. Khush Bakht, Lecturer in H.	GPGGC Haripur	A.V.P
	Economics, GGC Sarai Saleh,		
	Haripui (working against BS-18)		
45.	Ms. Sadia Abid, Lecturer in	GGC KTS, Haripur	A.V
43.		OGC 1C15, Haripai	
	Botany GGC Sarai Saleh, Haripur		
	(working against BS-18)	0.0001	
46.	Ms. Sabiha Jamal, Lecturer in	GPGGC Haripur	A.V.P
	Stats, GGC Sarai Saleh, Haripur		ĺ
	(working against BS-18)		
47	Ms. Farhat Naz, Lecturer in Maths,	GPGGC Haripur	A.V.P
47.		or ooc manpan	
	GGC Sarai Saleh, Haripur		
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48.	Ms. Saeeda Zainab, Lecturer in	GGC No.1 Abbottabad	A.V.P
	Chemistry, GGC Battagram		
	(working against BS-18)		•
40	Ms. Sadia Ajoom, Lecturer in	GPGGC Haripur	A.V.P
49.	IVIS, Sadia Ajooni, Lecturer in	or ode rumpur	
	Law, GGC Battagram (working		
	against BS-18)		
50.	Ms. Nighat Gohar, Lecturer in	GGC No.1 Abbottabad	Vice S.No.145
	Economics, GGC Battagram		above
	(working against BS-18)		
	Working against 175 10)	GGC No.1 Abbottabad	Vice S.No.48
51.	Ms. Maria Shafique, Lecturer in		above
	Islamiyat, GGC Bavtagram		40000
	(working against BS-18)		711 0 37 100
52.	Ms. Jehan Ara, Lecturer in H.	GGC Gulshan Rehman Colony	Vice S.No.108
	Economics, GGC No.1 Charsadda	Peshawar	above
-52	Ms. Izrana Bibi, Lecturer in	GFC (w) Peshawar	Vice S.No.134
53.	IVIS. IZIAIIA BIDI, Ecctulor III	<b>3. 6</b> ( <b>7</b> ) <b>1 1 1 1</b>	above
	English, GGC Lakki Marwat		
	(working against BS-18)		Vice S.No.22
54.	Ms. Sidra, Lecturer in Stats, GGC	GGC Gulshan Rehman Colony	1
	Manki, Swabi	Peshawar	above
55.	Ms. Mehek Sarfarz, Lecturer in	GGC Hayatabad, Peshawar	Vice S.No.146
) 55.		•	above
ļ	Stats, GGC Timergara	GGC Nowshera	A.V.P
56.	Ms. Tahira Jabeen, Lecturer in	OOC Nowshere	•
	Law, GGC Marghuz, Swabi		Vice S.No.65
57.	Ms. Nazia Ali Rehman, Lecturer in	GGC No.2 Abbottabad	1
	Maths, GGC No.2 Mansehra		above
58.	Ms. Noreen Kausar, Lecturer in	GPGGC Mardan	A.V.P
38.			·
<u> </u>	Zoology, GGC Batkhela	GGC Sheikh Maltoon	Against vacant
59.	Ms. Shahnaz Zia, Lecturer in	GGC Sheikh Maitoon	post of (B-17)
	H. Economics, GGC Sheikh		post of (D-17)
	Maltoon, Mardan (working against		
	BS-18)		
	Ms. Abida Yousaf, Lecturer in	GGC Pabbi, Nowshera	Vice S.No.20
60.	Ms. Abida Tousai, bectaroi in	<del>-</del> - · · ,	above
	Urdu, GGC Chaghar Matti,		
	Peshawar	GGGNI h - h - A hh - ttohod	Vice S.No.11:
61.	Ms. Irum Seemab Malik, Lecturer	GGC Nawanshehr, Abbottabad	above
	in Physics, GGC No.1 Mansehra		
62.	~ 1 3 7 1 7 - 4	GGC Mathra, Peshawar	Vice No.69
02.	in History, GGC Mathra, Peshawar		below
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	(working against BS-1 8)	GGC No.1 Abbottabad	Vice S.No.05
63.	Ms. Toshiba Saeed, Lecturer in	GGC No.1 Abbottabas	above
	Urdu, GGC No.1 Abbottabad		300.0
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-		GGC Chaghar Matti, Peshawar	Vice S.No.21
64	. IVIS. IVIGITUII TVISA, Doctard Matti	<u> </u>	above
	Economics, GGC Chaghar Matti,		
	Peshawar (working against BS-18)	GCGC Peshawar	Vice S.No.16
65	Ms. Ayesha Malik, Lecturer in	GCGC resilawai	above
"	Law, GGC Sheikh Maltoon,		a00 v C .
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66		GFC(W)resnawar	

67.	Physics, GGC Mankarai, Haripur	GGC No.1 Mansehra	Vice S.No.36
68.	(surplus in the subject of Physics)  Ms. Nadia Zeb, Lecturer in Chemistry, GFC (w)	GFC (w) Peshawar (1 <sup>st</sup> Shift)	A.V.P
	Peshawar (2 <sup>nd</sup> Shift)		
69.	Ms. Shaheen Jan, Lecturer in Botany, GGC Mathra, Peshawar	GGC Gulshan Rehman Colony Peshawar	Vice S.No.14
70.	Bushra Begam, lecturer in Home Economics, GGC Saidu Sharif, Swat.	GGC Manki Swabi.	above Vice S.No. 76 below
71.	Ambareen, lecturer in Urdu, GGC No. 1, Charsadda.	GFC (W), Peshawar	Against vacan
72.	Hadia Syed, lecturer in Urdu, GGC Nowshera.	GCGC Peshawar.	post AVP
73.	Saba Rani, lecturer in Economics, GGC Serai Saleh, Haripur.	GGC No. 1, Abbottat ad.	AVP
74.	Urooj Benish, lecturer in Computer Science, GGC Sheikh Maltoon, Mardan.	GGC Gulshan Rehman Colony, Peshawar	Vice S.No. 15 above.
75.	Rubina Gul, Lecturer in Urdu, GPGGC Haripur	GGC No.1 Abbottabad	Vice S.No.15
76.	Shahwana Siddiqui, Lecturer in H.Economics GGC Manki Sawabi	GGC Nowshera	Vice S.No.14
77.	Maryam Rani, Lecturer in Urdu, GGC Timergara	GGC Nowshera	above AVP
78.	Ayesha Ashfaq, Lecturer in Chemistry GPGGC Mardan	GGC No.1 Mansehra	AVP
79	Sanam Lecturer in Statistics, GGC Kernal Sher Khan	GCGC Peshawar	Vice S.No.34
. 80	Kiran Seneen, Lecturer Pashto GGC No.1 Charsadda (working against B-18)	GGC No.1 Charsadda	Vice S.No.12 above
81	Fozia Rani, Lecturer Maths GCGC Peshawar	GFC(W) Peshawar	Vice S. No. 16
82	Ms. Nighat Seema, Lecturer in Botany, GGC Daggar Buner	GGC Katlang Mardan	AVP
83	Ms. Nobahar, Lecturer in History, GGC Saidu Sharif Swat	GCGC Peshawar	Vice S.No.07

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- 11. P.S to Secretary, Higher Education Department, Khyber Pakhtunkhwa Peshawar.
- 12. Officers Concerned.

(Jehanzeb Khan) SECTION CFFICER (C-III)



NOTIFICATION

No. SOIC-HIMIETPUMBONOUS-18 to BS-19/Vol-III/ Decontinualism of this Department Notification

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G			PISTRICE OFFICER SOCIAL WELTARE DEPARTMENT COLOR, PESHAWAR



#### OFFICE OF THE PRINCIPAL GOVT. GIRLS DEGREE COLLEGE HAYATABAD PESHAWAR.

Phone No. 091-9219097 No. 738 / Email. <u>gydchovajahadpeshägmail.co</u>m

Date./7/12/2019

Subject:

NOTICE FOR DETAILED STAFF AT GGDC NO. 1 HAYATABAD

PESHAWAR.

Memo,

Refer to Government of Khyber Pakhtunkhwa Higher Education Archives & Libraries Department letter no. SO(C-III)HE/1-2/Detailment dated, 13-12-2019 the detailment of the following staff are hereby cancelled and they are directed to resume their duty at their original stations.

S. No.	Name/Designation	Subject	Detailment at	Original Station
	Dr. Rukhsana Yasmeen	Psychology	GGDC No. 1 Hayatabad	GGDC Nowshera
	Professor	San Sect Constitution	Peshawar	
2	Ms. Sajida	Urdir Eneral.	-do-	GPGC Mardan .
	Professor ,		Marine Commence	
3	Ms. Sadia Khan	Economics	-do-	GGDC Chargharmatti
	Associate Professor	State of the state		Peshawar
- <b>ļ</b>	Ms. Nasira Anwar	Zoology	-do-	"GGDC Rustam Marda
	Associate Professor			
5	Ms. Hijab Macyayı	Health and Physical	-(jr)-	GGDC Tall
	Assistant Professor	Education	the of property of	1
6	Ms. Maimoona Sarwar	Económics	-do-	GGDC No. 2
' <b>j</b>	Assistant Professor 119	and by a self-allow the an	Cated a Tompology of the	<sup>*</sup> Hayatabad Phase 5
	Ms. Safia Nageen  Assistant Professor	Islamiyat	-do-	GGDC Pabbi
/ L	Assistant Professor	SUW 384	100 130 MARINE 100 AR	😕 Nowshera 👵
8	Coll Ms: Farida: (108)	Home Economics	Calle Calor Calaba	GGDC Chitral.
	Assistant Professor		Personal	
9	Ms. Nasreen	Chemistry	-do-	GGDC Dargai
	Assistant Professor			
10	Ms. Khuram Hina Janjua	. · Maths	-do-	GGDC No. 3 DI Khar
	Lecturer			
11	Ms. Rabia Sana	Statistics	-do-	GFCW Peshawar.
	l'ecturer	1		

According to notification any officer found posted/attached on detailment henceforth shall be deemed to be absent from duty at her original place of posting and action under E&D rules will be initiated against her."

Landy h

St. Oak School

Govt. Girls Degree College No. 1

Hayatabad Peshawar.

भव्यवीयपूर्व किर्म भी वर

То The SECRETARY, HIGHER EDUCTION, ARCHIEVE & LIBRARIES DEPARTMENT PESHAWAR KHYBER PAKHTUNKHWA. REQUEST FOR ADJUSTMENT AT HAYATABAD GIRI SUBJECT: COLLEGE NO.1 AS A SPECIAL CASE. Respected sir. With due respect it is stated that I was working as Assistant Professor (BPS-18), Islamic studies at GGDC No: 01 Hayatabad # 07 Peshawar. Reference to the office order No. SO (C-III) HE/ Promotion BPS-18 to BPS-19/vol.III, Dated 10/10/2018 from Higher Education, Achieve & Libraries Department KP, the undersigned was promoted to the post of Associate Professor (BPS-19) Islamic Studies. I belong to village Dub Naguman Peshawar, I have permanent disability in my right leg is effected by polio, since childhood but furthermore my knee got fractured. I use stand to wall and I am unable to step on stair here in Hayatabad I deliver lecture in my hostel. Therefore it is requested kindly treat me as special case of disability and adjust me here in Hayatabad Peshawar.

Miss Safia Nageen

Associate Professor

Islamic Study

Date:

المنام المراد المراد المراد المراد المرد ا باعث تحرمرا نكه مقدمه مندرج عنوان بالامين اين طرف سے واسطے بيروي وجواب دہي وكل كارواكي متعلقه آن مقام <u>سر کیا عمران ما 4 مومیر</u>ه مقرركر كے اقراركيا جاتا ہے۔ كەصاحب موصوف كومقدمه كى كل كاروائى كاكال اختيار ، وكا ـ نيز وسیل صاحب کورامنی نامه کرنے وتقرر ثالبت و فیصله برحلف دینے جواب دہی اورا قبال دعوی اور بهسورت ومحرى كرف اجراءا درصولي چيك دروييارعرضي دعوى ادر درخواست برسم كى تقىديق زرایں پردستخط کرانے کا اختیار ہوگا۔ نیزصورت عدم بیروی میا ڈگری کیطرفہ یا بیل کی برامدگی اورمنسوخی نیز دائر کرنے اپیل مگرانی ونظر ثانی و بیروی کرنے کا ختیار ہوگا۔ از بصورت ضرورت مقدمہ ندکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کوایے ہمراہ یا اپنے بجائے تقرر کا اختیار موگا ۔اورصاحب مقررشدہ کوجھی وہی جملہ ندکورہ باا ختیارات حاصل ہوں مےاوراس کا ساختہ برواخت منظور تبول موكار دوران مقدمهين جوخ چدد برجاندالتوائ مقدمه كرسب سروموكار کوئی تاریخ بیشی مقام دوره بر بهویا عدے باہر موتو وکیل صاحب پابند موں مے۔ کہ پیروی ندکورکرمی\_لهذاوکالت نامهکهمدیا که سندر<sub>ی</sub>، به ,20 do \_ Od. 1 کے لئے منظور ہے۔ acceptally Imvan Cher Achoete

# BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

S.A # 6340/2020 Safia Nageen	.Appellant
Versus	•
Govt. of Khyber Pakhtunkhwa Through Chief Secretary, Director, Higher Education Peshawar & Others	Respondents

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Respondents

### BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHWAR

S.A # 6340/2020	•
Mst. Safia Nageen	Appellan
Versus	**
Govt. of Khyber Pakhtunkhwa	
Through Secretary	
and Director, Higher Education Peshawar	Respondents

### SUBJECT: PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO. 1, 2, 3 & 4

#### Respectfully Sheweth: -

#### Preliminary Objections:-

- 1. That the appellant has got neither cause of action nor locus standi to file the instant Service Appeal.
- 2. That the appellant has not come to this Tribunal with clean hands.
- 3. That the instant appeal is hit by doctrine/principle of laches.
- 4. That the appellant is estopped by her own conduct to file the instant appeal.
- 5. That the instant appeal is badly Time barred.

#### Facts: -

- 1) Pertains to record
- 2) Pertains to record
- 3) Pertains to record
- 4) Pertains to record
- 5) Correct
- 6) Pertains to record
- 7) Pertains to record
- 8) Correct. That some colleges of Khyber Pakhtunkhwa were facing acute shortage of Staff and other were over burden due to the detailment of the staff from one college to another and students were badly suffering due to this practice. In view of the above department vide letter Dated: 13/12/2019 cancelled all the detailments in best public interest. (Annex A).
- 9) Incorrect. That the appellant filed departmental appeal against order dated: 10/10/2018 to respondent No. 2 on 02/01/2020 and the same is badly time barred (Annex B). The Khyber Pakhtunkhwa Civil Servants Act, 1973 provides 30 days time for filing departmental appeal (Annex-C). Section 4 of the Khyber Pakhtunkhwa Service Tribunal is read as under:

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"Any civil servant aggrieved by any final order, whether original or appellate, made by a departmental authority in respect of any of the terms and conditions of her service may, within thirty days of the communication of such order to her <sup>1</sup>[or within six months of the establishment of the appropriate Tribunal, whichever is later,] prefer an appeal of the Tribunal having jurisdiction in the matter:

Provided that:-

Where an appeal review or a representation to a departmental authority as provided under the Khyber Pakhtunkhwa Civil Servants Act, 1973, or any rules against any such order, no appeal shall lie to a Tribunal unless the aggrieved civil servant has preferred an appeal or application for review or representation to elapsed from the date on which such appeal, application or representation was preferred (Annex-D).

- 10) Incorrect. As already explained her appeal is badly time barred but even than as a special case her name has been included in the placement committee list and currently no post is vacant at her desired station.
- 11) Need no Comments.

#### Grounds: -

- a) That under section 10 of the Civil Servant Act 1973, a Civil Servant is liable to service anywhere, where Competent Authority posted her/him. Section 10 of the civil servant Act is read as under:
  - "Every civil servant shall be liable to serve anywhere within or outside Province, in any post under the Federal Government, or any Provincial Government, or local authority, or a corporation or body set up or established by any such Government"
- b) Subject to proof by appellant. No documentary evidence in support of this Para is attached.
- c) That the name of the appellant is already included in placement committee list but currently there is no vacant post of BPS-19 at her desired station i.e Govt; Girls Degree College No. 1, Hayatabad Peshawar.

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- d) The college has one student hostel but the same has been converted into BS block as mainly locals of the district are admitted in the college. Moreover, as per Service appeal, the appellant is permanent resident of Naguman, Peshawar and is residing with her parents there. It is pertinent to mention here that the distance from Naguman to Pabbi and Naguman to Hayatabad is almost same.
- e) That the respondents may be allowed to raise additional grounds at the time of arguments.

#### Prayer:-

In the light of above submission the instant appeal may please be dismissed in larger public interest.

Secretary,
Higher Education Department
Respondent No. 1

Higher Education Department Respondent No. 2

Principal
Principal
Govt; Girls Degree College Carbbi, Nowshera
Respondent No. 3

Govt. Girls Degree College Hayatabad, Peshawar
Respondent No.4

PRINCIPAL

Cout. Cirls Dayres College No.1

Hayatabad Peshawar

#### BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBÜNAL, PESHAWAR

S.A # 6340/2020		
Safia Nageen	Appella	ant
	Versus	
Gove of Khyber Polchtunkhyyo		

#### **AFFIDAVIT**

I, Jehanzeb Awan, Superintendent (Litigation), Higher Education
Department do hereby declare and affirm on oath that the contents of Para
Wise Comments are correct to the best of my knowledge and belief and that
nothing has been concealed from this Honourable Court.

Identified by:

Deponent
Superintendent
Directorate of Higher Education
Khyber Pakhtunkhwa Peshawar



#### HIGHER EDUCATION, ARCHIVES & LIBRARIES DEPARTMENT

Annex

No 80(C-W)ME/1-ZiDetalinent / Dated Pasturiar, 13" December 2019

<u>MOST IMMEDIATE</u> To

The Director General (Commerce & Management Gomes).
 Directorate of Higher Education.
 Khyber Pakhtunkhwa, Poshawar.

 The Director, Directorate of Higher Education, Khyber Pakhtunkhwa, Peshawar

Subject: DETAILMENT

I am directed to refer to this Department's letter of even remains dated 21" November, 2019, on the subject noted above and to say that according to the rules/laws of the Government 'no posting/transfers of the officers on detailment basis shall be made." However, it has been noticed that a considerable number of transfer faculty is working on detailment basis in various colleges of Khyber Pakhtunkhwa

- The Secretary to Government of Khyber Pakhtunkhwa. Higher Education has taken serious notice of the issue and directed that all postings/adjustments of teaching faculty (Male&Female) in Government Colleges made on detailment trans of cancelled with immediate effect to implement the posting/transfer policy of the Government in letter and spirit. Any officer found posted/attached on detailment henceforth shall be deemed to be absent from duty at his/ner original place of posting and action under E&D rules will be initiated against him/ner.
- 3. Implementation report be submitted within three days positively.

Section Officer (Colleges-III)

Copy to the:-

1. PSO to Chief Secretary, Khyber Pakhtunkhwa.

2. Deputy Secretary (Admn) with the request to repatriate all the officers working on detailment basis in Higher Education Department, Gost, of Knyber Pakhtunkhwa.

3. Section officer (C-II) with the direction to pursue the matter with Directional of Higher Education Department.

4. Section Officer (C&MS), Hittger Education Department for similar action.

5. PS to Secretary Higher Education Department.

Section Officer (Colleges-III)

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To

The Director

Higher Education Department, Government of
Khyber Pakhtunkhwa, Peshawar

Through: Proper Channel

Subject: REQUEST FOR ADJUSTMENT AT HAYATABAD GIRLS DEGREE
COLLAGE NO.01 AS A SPECIAL CASE

Respected Sir

It is to submit in you great honor that I was working as Assistant Professor(BS-18), Islamic Studies, at GGDC, Hayat Abad, Phase-6. Now reference to the office order NO.SO(C-III) HE/Promotion BS-18 to BS-19/Vol.III, dated 10/10/2018, from the Higher Education, Archives & Libraries Department, Government of Khyber Pakhtunkhwa, the undersigned was promoted to the post of Associate Professor (BS-19) Islamic Studies, and posted at the GGDC, Pabbi, Nowshera.

I have permanent disability in my right leg is affected by Polio, since childhood and belongs to village Dub, Naguman, Peshawar. This disability further aggrieved me from long walking as on July 17<sup>th</sup>, 2018, I was free fall on the cemented pathway in my home and thus resulted a completely broken of the right Knee of the Polio affected leg. After this an intensive right knee surgery was done and the doctors suggested for complete bed rest of 04 months. Moreover, no male members in my home is there to pick and drop me to the college, as earlier I was residing at the Staff hostel of the GGDC, Hayatabad, Peshawar.

Now it my new place of duty the hostel facility is not available and also my disability is a problem for me to travel every day for the duty from my village.

Therefore, it is requested kindly adjust me at Hayatabad Girls Degree Collage No.01, against the post of Associate Professor as a special case, Keeping in view my disability and genuine problems. I will pray for your long and prosperous life.

Looking forward to younkind cooperation.

Miss. SafiaNage

**Associate Professor** 

**Islamic Studies** 

GGDC,Pabbi, Nowshera.

my

Anna (C) A

- Where any subscription made by a civil servant to his provident fund has not been shown or credited in the account by the Accounts Officer or other officer required maintaining such account, such subscription shall be credited to the account of the civil servant on the basis of such evidence as may be prescribed.
- Benevolent Fund and Group Insurance:- All civil servants and their families shall be entitled to the benefits admissible under the West Pakistan Government Employees Welfare Fund Ordinance, 1969 (W.P. Ordinance of 1969), or the Khyber Pakhtunkhwa Government Servants Benevolent Fund Ordinance, 1972 (The Khyber Pakhtunkhwa Ordinance VII of 1972), and the rules made there under.
- Right of Appeal or Representation:- (1) Where a right to prefer an appeal or apply for review in respect of any order relating to the terms and conditions of his service is provided to a civil servant under any rules applicable to him. such appeal or application shall, except as may be otherwise prescribed, be made within thirty days of the date of such order.
- Where no provision for appeal or review exists under the rules in respect of any order or class of orders, a civil servant aggrieved by any such order may, within thirty days of the communication to him of such order, make a representation against it to the authority next above the authority which made the order:

relating to the Provided that no representation shall lie on matters determination of fitness of a person to hold a particular post or to be promoted to a higher post or grade.

### MISCELLANEOUS

Saving: - Nothing in this Act or in any rule shall be construed to limit or abridge the power of the Governor to deal with the case of any civil servant in such manner as may appear to him to be just and equitable:

Provided that, where this Act or any rule is applicable to the case of a civil servant, the case shall not be dealt with in any manner less favourable to him than that provided by this Act or such rules.

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- Indemnity:- No suit or, prosecution or other legal proceedings shall lie against a civil servant, for anything done or intended to be done in good faith in his official capacity under this Act or the rules, instructions or direction made or issued there under.
- Jurisdiction barred.- Save as provided under this Act and the Service Tribunal Act. 1974 (The Khyber Pakhtunkhwa Act No. 1 of 1974), or the rules made there under, no order made or proceedings taken under this Ac, or the rules made there under by the governor or any other officer authorized by him shall be called in question in any court and no injunction shall be granted by any court in respect of any decision made, or proceedings taken in pursuance of any power conferred by or under this Act or the rules made there under.
- Removal of difficulties: If any difficulty arises in giving effect to any of the provisions of this Act, the Governor may make such order, not inconsistent with the

#### <sup>1</sup> Service Tribunal Act, 1974

(3) The other terms and conditions of service of the Chairman and members shall be such as may be determined by the Governor.]

4. Appeal to Tribunals.---Any civils servant aggreed by any final order, whether original or appellate, made by a departmental authority in respect of any of the terms and conditions of his service may, within thirty days of the communication of such order to him [or within six months of the establishment of the appropriate Tribunal, whichever is later,] prefer an appeal of the Tribunal having jurisdiction in the matter:

#### Provided that--

- where an appeal, review or a representation to a departmental authority as provided under the Khyber Pakhtunkhwa Civil Servants Act, 1973, or any rules against any such order, no appeal shall lie to a Tribunal unless the aggrieved civil servant has preferred an appeal or application for review or representation to such departmental authority and a period of ninety days has elapsed from the date on which such appeal, application or representation was preferred; <sup>2</sup>[....]
- (b) no appeal shall lie to a Tribunal against an order or decision of a departmental authority determining--
  - the fitness or otherwise of a person to be appointed to or hold a particular post or to be promoted to a higher post or grade; or
  - (ii) the quantum of departmental punishment or penalty imposed on a civil servant as a result of a departmental inquiry, except where the penalty imposed is dismissal from service, removal from service or compulsory retirement <sup>3</sup>[; and]
  - (c) no appeal shall lie to a Tribunal against an order or decision of a departmental authority made at any time before the Ist July,1969]

**Explanation.-**--In this section, "departmental authority" means any authority, other than a Tribunal, which is competent to make an order in respect of any of the terms and conditions of service of civil servants.

- Constitution of Benches.---(1) There may be constituted one or more Benches, each consisting of--
  - '(a) The Chairman alone; or

1. I inserted by Khyber Pakhtunkhwa No. IV of 1974.

2. The word "and" deleted by Khyber Pakhtunkhwa Act No. IX of 1994.

The full stop replaced by semicolon and the word "and" inserted by Khyhor Pakhtunkhwa Act No. IX of 1974

4. Clause "(c) substituted by Khyber Pakhtunkhwa Act No. IX of 1974.

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

C.M. No.

In

Service Appeal No. <u>6340</u>/2020

Safia Nageen .....(Appellant)

Purup to the court with VERSUS

Government of Khyber Pakhtunkhwa through Secretary
Higher Education and others.....(Respondents)

Reoder.

#### APPLICATION FOR EARLY HEARING.

#### **Respectfully Sheweth:**

- 1. That the above titled Service Appeal is pending adjudication before this Hon'ble Tribunal which is fixed for 26/10/2020.
- 2. That the previous date of hearing in the Service Appeal was 21/08/2020 and on the fateful day it was 1<sup>st</sup> Moharram which was public holiday and the proceeding in the above mentioned case was not

Be are derote farl' 2620.

To are all in farl' 2620.

The order of the all oncerns of 19/202

carried out and the date was changed on note reader to 26/10/2020.

3. That stay matter is involved in the above mentioned

Service Appeal as the appellant is unmarried as well

as disable lady and she was transferred out of

Peshawar, despite the fact that her parents are

residing at Peshawar.

4. That it shall be in the interest of justice to urgently

fixed the date in the Service Appeal.

It is, therefore, respectfully prayed that on

acceptance of this application, the date in the

instant Service Appeal may kindly be fixed as earlier

as possible.

Appellant

Through

Dated: 01/09/2020

Imran Khan

Advocate High Court,

Peshawar.

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

C.M. No. 620/2020
In
Service Appeal No. 6340/2020
Safia Nageen (Appellant)

#### VERSUS

Government of Khyber Pakhtunkhwa through Secretary Higher Education and others......(Respondents)

#### **AFFIDAVIT**

I, Imran Khan Advocate High Court, as per instructions of my client, do hereby solemnly affirm and declare that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

DEPONENT

## BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

### Reply on behalf of Respondent No.5

#### **Preliminary Objections:-**

- 1. That the appellant has no cause of action.
- 2. That the appellant has no locus standi.
- 3. That the instant appeal is barred by Law.
- 4. That the appellant is bad due to joinder and mis-joinder of the necessary parties.

#### **Respectfully Sheweth:**

#### Para 1 to 11:-

It is submitted that being an administrative matter it relates to respondents No. 1 to 4 and they are in a better position to redress the grievances of the appellant. Besides, the appellant has raised no grievances against respondent No.5.

Keeping in view the above mentioned facts, it is humbly prayed that the appellant may be directed to approach respondents No. 1 to 4 for the satisfaction of her grievances and the name of Respondent No.5 may be deleted from the list of Respondents.

ACCOUNTANT GENERAL KHYBER PAKHTUNKHWA



### DIRECTORATE OF HIGHER EDUCATION KHYBER PAKHTUNKHWA RANU GARHI, PESHAWAR

Tel # 091-2650027 ~ 2650024 - 2650015 E-mail:- dhekpkpesh@gmail.com Facebook.com/dhekppeshawar Twitter.com/dhekppeshawar1

\_/CA-I/Estt: Branch/A-12/Recruitment of Associate Professor of Female File. Dated Peshawar the

There are seven (07) sanctioned posts of Associate Professor (BPS-19) at GDGC No.1 Hayatabad Peshawar against which following subjects staff is working at said college.

- 1. Associate Professor of Health & Physical Education (BPS-19)
- 2. Associate Professor of Political Science (BPS-19)
- 3. Associate Professor of Zoology (BPS-19)
- 4. Associate Professor of Botany (BPS-19)

Upon upgradation of Five (05) Tier formula Three (03) Posts in BPS-17 have been abolished and same have been added in grade B-19.

Now Three Lower grade officers are drawing their salaries against the post of Associate Professor (BPS-19). Further post in the subject of islamiat is lying vacant at said college but no vacant post in relevant scale.

The applicant can be adjusted at her desired station, if one of the Lecturer (BPS-17) (Drawing Salary against B-19) is transferred to some other college, Please.

With Best Regards.

Khadija Kayat DY. DIRECTOR (FEMALE)

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MB, Marwaii ijaz Akhunzada	House Economics	Peshawar	05/2019				
Rimsha Qureshi	Geography	Pestawar	09/2019				
Ma. Shehla Sharif	Political Science	Humio .	09/2019				
4. GCDC Hayatabad Peshawar							
B-21 (01 Post)							
Name	Subject	Domirile	Tennre	Remarks			
*							
D-20 (94 Fixe)							
			06/2013				
Furida Hegum Shah	History	SWA	L				
8-ÎĴ (07 Posts)							
Name	Subject	Demkils	Tesare	Remarks			
Farzana Begum	Botany	Charsadda	04/2018				
Ms. Neclam Gul	Political Science	Malakund,	10/2015				
Shakeela Nadir 🗻	Zoology 2	Bannu					
Ms. Hijob Maryam /	НРБ 🔻	Banau	11/2020				
B-18 (09 Posts)							
Name	Subject	Domicile	Tennre	Remarks			
Snima Nosbeeu	Mathematics	Peshawar	20/12/2008				
Sadia Jabeen	Sociolay	Lakki Marwat	31/5/2008				
Tahira Naz	Geography	Mardan	31/5/2008				
Ms. Faryal Sofdar	Home Economics	Bannu	11/2018				
Shahana Akbar Marwat	Home Economics	Lakki Marwats	12/2017	,			
Ma. Noor-Ul-Warn	Computer Sc	Peshawar	10/1/2013				
Ms. Nabeela Khan	Economics *	Peshawar	10/2018				
Ms. Naheed Hussain	Pak Study -	Swat	02/2019				
Ms. Nazio Amir	Psychology	FR Peshawar	10/2019				
B-17 (10 Posts)							
Natire	Subject	Domicile	Tenure	Remarks			
Shazia Mehmood	Urdu	Karak	13/3/20/14				
Ms. Farkhanda Akbar (FEP)	Urda	Swat	07/2017	Deputed from FEF			
Ms. Sadia Kokab	English?	Karak	31/05/2012				
	Akhunzada Rimsha Qureshi Ms. Shehla Sharif  Name  Ms. Gul Naz Dr. Safia Gul Furida Begum Shah  Name Farzana Begum Ms. Neclam Gul Shakeela Nadir Ms. Hijab Maryam  Name Snima Nosbeen Sudia Jabeen Tahira Naz Ms. Faryal Safdar Shahana Akbar Marwat Ms. Noor-Ul-Wara Ms. Nabeela Khun Ms. Naheed Hussain Ms. Nazia Amir  Name Shazia Mehmood Ms. Farkhanda Akbar (FEP)	Akhunzada Rimsha Qureshi Geography Ms. Shehla Sharif Political Science  4. GGDC Hay  8-21 (0  Name Subject  B-20 (0  Ms. Gul Naz Principal/ Chemistry Dr. Safia Gul Economics  Furida Begum Shah Histury  B-10 (0  Name Subject  Farzana Begum Botany Ms. Neclam Gul Political Science Shakeela Nadir Zoology  Ms. Hijab Maryam HPE  B-18 (0  Name Subject  Subject  Solims Nosbeeu Mathemastics  Sadia Jabeen Sociolgy  Tahira Naz Geography Ms. Faryal Safdar Honse Economics  Ms. Nabeela Khan Economics	Akhunzada Rimsha Qureshi Geography Peshawar  Ma. Shehla Sharif Political Science Banga  4. GGDC Hayatabad Peshawa  B-21 (01 Post)  Name Subject Domiribe  B-20 (04 Posts)  Ms. Gul Naz Principal/ Chemistry Peshawar  B-20 (07 Posts)  Ms. Gul Naz Principal/ Chemistry Peshawar  Dr. Safia Gul Economics Mardan  Furida Begum Shah Hustury SWA  B-10 (07 Posts)  Name Subject Domiribe  Farzana Begum Botany Charsadda  Ms. Neclam Gul Political Science Malakand  Shakeela Nadir — Zoology — Banga  Ms. Hijob Maryam HPE Banga  B-18 (09 Posts)  Name Subject Domiribe  Saima Nosbecu Mathematics Peshawar  Sadia Jabeen Sociolgy Lakki Marwat  Tahira Naz Geography Mardan  Ms. Faryal Safdar Home Economics Banga  Ms. Nabeela Khan Economics Banga  Ms. Nabeela Khan Economics Peshawar  Ms. Nabeela Khan Economics Peshawar  Ms. Nabeela Khan Economics Peshawar  Ms. Nabeela Khan Economics Peshawar  Ms. Nabeela Khan Economics Peshawar  Ms. Nabeela Khan Economics Peshawar  Ms. Nabeela Khan Economics Peshawar  Ms. Nabeela Khan Economics Peshawar  Ms. Nabeela Khan Economics Peshawar  Ms. Nabeela Khan Economics Peshawar  Ms. Nabeela Khan Economics Peshawar  Ms. Nabeela Khan Pak Study Swat  Ms. Nabeela Khan Economics Peshawar  Ms. Nabeeda Khan Economics Peshawar  Ms. Nabeeda Khan Economics Peshawar  Ms. Nabeeda Khan Economics Peshawar  Ms. Nabeeda Khan Economics Peshawar  Ms. Nabeeda Khan Economics Peshawar  Ms. Nabeeda Khan Economics Peshawar  Ms. Nabeeda Khan Pak Study Swat  Ms. Farkhanda Akbar (Lrcha Karak  Ms. Farkhanda Akbar (Lrcha Karak	Rimsha Qureshi   Geography   Peshawar   O9/2019			

4.	Ma. Saima Hidayat	English	Mohamad Ag	09/2019	
5.	Ms. Amina Sobail	English	Swart	11/2018	
6.	Ms. Zainab Rehman	English	. Peshawar	03/2013	
7.	Maryam Shahab	Physics	Peshawar	22/10/2014	
8,	Hajūs Bibi	Chemistry	Chitral	07/2017	
9.	Saire Gul	Chemistry"	Mardan	10/2017	
10,	Ms. Kalsoom Bano	Law	SWA	09/2019	
11.	Ms.Shabana Khamini	Pol.Science	D.IKhan	03/2018	
12.	Ma. Rukhsana Jabern	Statistica	Khyber Ag	10/2018	
13.	Syeda Farzana Bibi	Botany	Bazzu	05/2019	
14.	Ms. Anila Sarwat	HPE	Dir Lower	10/2019	
	* A CCDC3Lether Decharge				

್ 5. GGDC Mathra Peshawui



#### DIRECTORATE OF HIGHER EDUCATION KHYBER PAKHTUNKHWA RANO GHARI, NEW CHAMKANI CHOWK, PESHAWAR

E-mail:- dhekpkpesh@gmail.com Facebook.com/dhekppeshawar Twitter.com/dhekppeshawar1

Tel # 091-2650027 / 2650015

Fax # 091-2260181

/CA-I/Estt: Branch/A-12/Ms. Safia Nagcen/ Islamiyat

Dated Peshawar the

To,

The Section Officer (C-I), Govt: of Khyber Pakhtunkhwa, Higher Education Department, (Peshawar.

SUBJECT

ADJUSTMENT OF MS. SAFIA NAGEEN, ISLAMIYAT.

I am directed to refer to this office letter No. 5606 dated 21.12.2020 (Copy enclosed) on the subject cited above and to state that reply of the subject matter is still awaited at your end which may be decided as soon as possible being a Court matter, please, ATTESTED

(Khadija Inayat)

DY. DIRECTOR (FEMALE)

ole Superintendent Directorate of Higher Education KHADA LAHHINIYAMA LEZHAMA Su seini are ni unduei enaranai



#### DIRECTORATE OF HIGHER EDUCATION KHYBER PAKHTUNKHWA RANO GHARI, NEW CHAMKANI CHOWK, PESHAWAR

Tel # 091-2650027 / 2650015

Fax # 091-2260181

E-mail:- dhekpkpesh@gmail.com Facebook.com/dhekppeshawar Twitter.com/dhekppeshawar1

/CA-I/Estt: Branch/A-12/Service Tribunal, Peshawar File.

Dated Peshawar the 👲 [

То

The Secretary,

Govt: of Khyber Pakhtunkhwa, Higher Education Department,

Peshawar.

SUBJECT:

ADJUSTMENT OF MS. SAFIA NAGEEN, ASSOCIATE PROFESSOR IN

ISLAMIYAT.

السلام عليكم /Respected Sir

I am directed to enclose herewith a copy of Service Tribunal order regarding adjustment of Ms. Safia Nageen, Associate Professor in Islamiyat (BPS-19) Govt; Girls Degree College, Pabbi (Nowshera) at Govt; Girls Degree College, Hayatabad (Peshawar) being a disabled person on sympathetic grounds and to submit the posting proposal for further necessary action, please.

S #	Name & Designation	Present Station	Requested station	Remarks
1.	Ms. Safia Nageen, Associate Professor in Islamiyat (BPS-19).	GGDC, Pabbi (Nowshera).	GGDC, Hayatabad (Peshawar).	Against Ms. Anila Sarwat, Lecturer in Health &Physical Education (BPS-17)
2.	Ms. Anila Sarwat, Lecturer in Health &Physical Education (BPS-17) (working against BPS-19).	GGDC, Hayatabad (Peshawar).	Govt; Frontier College for Women, Peshawar.	Against the vacant post.

With best regards.

Directorate of Higher Education Khyber Pakhtunkhwa Poshawar

(Khadija Inayat)

DY. DIRECTOR (FEMALE