

Sr. No	Date of order/ proceedings	Order or other proceedings with signature of Judge or Magistrate
1	2	3
	03.10.2019	<p align="center"><b><u>BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL</u></b></p> <p align="center"><u>Appeal No.193/2019</u></p> <p>Date of Institution ... 12.02.2019 Date of Decision ... 03.10.2019</p> <p align="center">-----</p> <p>Shameem Saeed, PST, GGPS Sadiq Abad Patak District Bajour ----- <b>Appellant</b></p> <p align="center"><b><u>Versus</u></b></p> <p>Government of Khyber Pakhtunkhwa through Secretary, Elementary &amp; Secondary Education, Khyber Pakhtunkhwa Peshawar and three (03) others ----- <b>Respondents</b></p> <p align="center"><b>Muhammad Hamid Mughal.....Member(J)</b> <b>Mr. Hussain Shah.....Member (E)</b></p> <p><b><u>JUDGMENT</u></b></p> <p><b><u>Mr. HUSSAIN SHAH</u></b>:-Learned counsel for the appellant and Mr. Riaz Khan Paindakhel learned Assistant Advocate General for the official respondents and counsel for private respondent present.</p> <p>2. The appellant was firstly transferred on 02.08.2018 from GGPS Khair Abad to GGPS Chamarkand. On 17.08.2018 the appellant was transferred to GGPS Sadiq Abad from GGPS Chamarkand. On 04.10.2018 an order regarding ban on transfers was imposed by the Deputy Director (Establishment) Directorate of Education, the appellant was transferred from Sadiq Abad to Government Girls Primary School Loi-sum on 05.11.2018. Feeling aggrieved by the order dated 05.11.2018 the appellant filed departmental appeal on 06.11.2018 but was not respondent by the department within a statutory period of ninety (90) days, hence the appellant filed the instant service appeal on 12.02.2019.</p> <p>3. The learned counsel for the appellant argued that the impugned transferred order is illegal and unlawful and is in</p>

violation of the posting transfer policy of the government. Further contended that the impugned order is against the wed-lock policy as the husband of the appellant is a government servant and belonging to the same locality. Further contended that the transfer order to the Loi sum from Sadiq Abad is in violation of the tenure policy. As regarding the tenure of posting transfer the learned counsel for the appellant relied on the August Supreme Court judgment reported on PLD 1995 Supreme Court Page No.530. In support of the ground of the wed-lock policy in the posting transfer of a government servant the learned counsel relied on the Judgments of the August Supreme Court reported as 2004 PLC (CS) 622, 2003 PLC (CS) 1322, 1994 PLC (CS) 1644, 1991 PLC (CS) 478. Further contended that the impugned order was issued without any ground exigencies of service nor any specified public interest. Further relied upon the preposition as set by the August Supreme Court in its judgment in a Constitutional Petition No.23/2012, decided on 18.10.2012 wherein the August Supreme Court explicitly regarding the tenure, posting and transfer: When the ordinary tenure of posting has been specified in the law or rules made there under; such tenure must be respected and cannot be varied, except for compelling reasons, which should be recorded in writing and are judicially reviewable. He pleaded that the instant service appeal may be accepted as prayed for against the respondents and in favor of the appellant.

4. The learned counsel for private respondents No.4 stated that the appellant was posted at GGPS Khair Abad and where from she was transferred to GGPS Chamarkand on 02.08.2018 in her own

pay scale while the private respondent No.4 transferred from GGPS Sadiq Abad to GGPS Loi sum. The appellant refused to resume the charge at the Chamarkand and remain absent hence counsel for private respondent requested to dismiss the appeal.

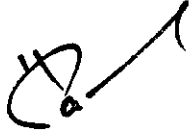
5. The learned Assistant Advocate General contested the facts, grounds of the appeal and arguments of the learned counsel for the appellant and stated that the appellant being habitually disobedient and explanation and show cause notice was issued and an inquiry was conducted to find out her posting position. Further contended that her posting order in the Chamarkand was wrongly issued by the then DEO hence the same was withdrawn and the private respondent was allowed to remain posted in the GGPS Chamarkand. He further contended that every civil servant is required to serve anywhere in the province as per order of the competent authority on need base and public interest. He pleaded that the appeal may be dismissed as the same does not carry any merit.

6. Arguments heard. File perused.


7. After the detailed scrutiny of the documents on record, arguments and counter arguments of the learned counsel for the appellant and the learned Assistant Advocate General and observed that the appellant was posted in GGPS Sadiq Abad on 17.08.2018 and again transferred on 05.11.2018 to GGPS Loi sum during the period of ban on posting transfer, imposed on 04.10.2018. The respondent department could not justify the premature transfer of the appellant from GGPS Sadiq Abad. Though it was stated that an inquiry was also pending against the appellant for being Habitually

absenting from duty and being disobedient. During the pendency of litigation this Tribunal continued the suspension of impugned transfer order of the Hon'ble Peshawar High Court Peshawar issued while disposing of the Writ Petition No.5547-P/2018 vide judgment dated 14.11.2018.

8. In view of the above this Tribunal accepts the appeal. The official respondents are at liberty to initiate and dispose of disciplinary proceedings against the appellant under the law/rules. Parties are left to bear their own costs. File be consigned to the record room.



(Muhammad Hamid Mughal)  
Member



(Hussain Shah)  
Member

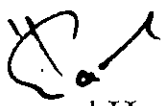
ANNOUNCED  
03.10.2019

23.09.2019 Due to general strike on the call of Khyber Pakhtunkhwa Bar Council learned counsel for the appellant is not in attendance. Mr. Kabirullah Khattak learned Additional Advocate General for the respondents present. Adjourned. To come up for arguments on 03.10.2019 before D.B.

  
(Hussain Shah)  
Member

  
(M. Amin Khan Kundi)  
Member

03.10.2019 Learned counsel for the appellant present. Mr. Riaz Paindakheil learned Assistant Advocate General for official respondents present. Vide our detailed judgment of today of this Tribunal, placed on file, the present service appeal is accepted. The official respondents are at liberty to initiate and dispose of disciplinary proceeding against the appellant under the law/rules. Parties are left to bear their own costs. File be consigned to the record room.

  
(Muhammad Hamid Mughal)  
Member

  
(Hussain Shah)  
Member

ANNOUNCED.  
03.10.2019

04.09.2019

Junior to counsel for the appellant present. Mr. Zia Ullah learned Deputy District Attorney for the official respondent No. 1 to 3 and junior to counsel for the private respondent No.4 present and seeks adjournment. Adjourned. To come up for arguments on 20.09.2019 before D.B.

  
(Hussain Shah)  
Member

  
(M. Amin Khan Kundi)  
Member

20.09.2019

Clerk to counsel for the appellant present. Mr. Zia Ullah learned Deputy District Attorney present. Clerk to counsel for the appellant seeks adjournment. Being a transfer posting case, adjourned for a short date. To come up for arguments on 23.09.2019 before D.B.

Needless to mention that interim relief granted up till 21.05.2019 was not extended any further. As such the interim relief/suspension order is no more in field.

04.09.2019

Junior to counsel for the appellant present. Mr. Zia Ullah learned Deputy District Attorney present. Clerk to counsel for the appellant seeks adjournment. Being a transfer posting case, adjourned for a short date. To come up for arguments on 23.09.2019 before D.B.

Needless to mention that interim relief granted up till 21.05.2019 was not extended any further. As such the interim relief/suspension order is no more in field.

Member

Member

30.07.2019

Representative of the appellant present. Mr. Riaz Khan Paindakheil learned Assistant Advocate General alongwith Hazrat Shah Superintendent for official respondents present. Parawise comments on behalf of private respondent received and placed on file. Learned Assistant Advocate General seeks adjournment. Adjourn. To come up for further proceedings/arguments on 08.08.2019 before D.B.

  
Member

  
Member

08.08.2019


Clerk to counsel for the appellant present. Mr. Muhammad Jan, DDA for respondents present. Clerk to counsel for the appellant seeks adjournment due to general strike on the call of Pakistan Bar council. Adjourn. To come up for arguments on 23.08.2019 before D.B.

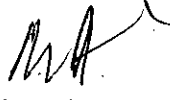
  
Member

  
Member

23.08.2019

Counsel for the appellant present. Mr. Ziaullah, Deputy District Attorney for official respondents No. 1 to 3 and counsel for private respondent No. 4 present. Learned counsel for the appellant requested for adjournment. Adjourned to 04.09.2019 for arguments before D.B.

  
(Hussain Shah)  
Member

  
(M. Amin Khan Kundi)  
Member

14.06.2019

Due to general strike by the Pakistan Bar Council, the case is adjourned. To come up on 28.06.2019 before D.B.



Member



Member

28.06.2019

Clerk of counsel for the appellant and Mr. Ziaullah, Deputy District Attorney for the official respondents present. Learned counsel for private respondent No. 4 has sent an application for adjournment through daily dairy dated 27.06.2019. Application is accepted. The Case is adjourned to 12.07.2019 for arguments before D.B.



(HUSSAIN SHAH)  
MEMBER



(M. AMIN KHAN KUNDI)  
MEMBER

12.07.2019

Counsel for the appellant and Mr. Muhammad Jan, DDA for respondents present. Counsel for the appellant seeks adjournment. Adjourned. Case to come up for arguments on 30.07.2019 before D.B.



Member



Member

30.07.2019


Learned counsel for the appellant, Mr. Qasim Ghani, learned

District Attorney along with Rizwan Admin Officer for official



07.05.2019

Clerk of counsel for the appellant present. Mr. Usman Ghani, District Attorney for the official respondents present. Mr. Zia-ud-Din Khan, Advocate has already submitted application for impleadment of Mst. Dilbar Begum Primary School Teacher at Government Girls Primary School Sadiq Abad District Bajaur. The same was fixed for reply and arguments for today. However, clerk of counsel for the appellant stated at the bar that he has contacted with the counsel for the appellant and stated that he has expressed no objection on acceptance of impleadment application therefore, impleadment application filed by learned counsel Mr. Zia-ud-Din Khan on behalf of Mst. Dilbar Begum is accepted and Muharrar is directed to enter the name of Bilbar Begum in the panel of respondents. Adjourned. To come up for written reply/comments on 21.05.2019 before S.B. Till then the operation of transfer order dated 05.11.2018 shall remain suspended.

  
(Muhammad Amin Khan Kundi)  
Member

21.05.2019

Learned counsel for the appellant present. Mr. Kabir Ullah Khattak learned Additional Advocate General present. Bahramand ADEO for respondent department present, submitted reply on behalf of respondent No.3 and stated that respondent No.1 also relies upon the same. Raza ud Din Advocate on behalf of counsel for private respondent No.5 also present and seeks adjournment. In the present service appeal, transfer posting order has been made impugned and ad-interim relief has also been granted. The present case is therefore assigned to D.B for further proceedings. Private respondent may submit reply before D.B. Adjourn. To come up for further proceedings on 14.06.2019 before D.B.

  
Member

19.04.2019 No one present on behalf of appellant. Mr. Kabirullah Khattak learned AAG alongwith Bahramand Assistant Education Officer present. Representative of the respondent department requested for time to furnish written reply/comments. Granted. To come up for written reply/comments on 22.04.2019 before S.B.

Member

22.04.2019 None for the appellant present. Addl: AG alongwith Mr. Bahramand, Asst: Education Officer for respondents present. Written reply on behalf of respondent no.3 submitted. Mr. Zia Ud Din, Advocate present and submitted application for impleadment which is placed on file. Notice of this application be issued to the appellant for submission of reply/arguments. Case to come up for written reply/comments on behalf of respondents no. 1 and 2 and reply/arguments on impleadment application on 07.05.2019 before S.B. Till then the operation of transfer order dated 05.11.2018 shall remain suspended.

  
(Ahmad Hassan)  
Member

5547-P/2018 was pleased to suspend the impugned transfer order till the date of Khyber Pakhtunkhwa Service Tribunal was made functional.

Notice of the application be also given to the respondents for the date fixed. Till then the operation of transfer order dated 05.11.2018 shall remain suspended.

Appellant Deposited  
Security & Process Fee

Chairman

03.04.2019

Clerk to counsel for the appellant and Addl: AG for respondents present. Written reply not submitted. Requested for adjournment. Adjourned. Case to come up for written reply/comments on 17.04.2019 before S.B. Till then the operation of transfer order dated 05.11.2018 shall remain suspended.

(Ahmad Hassan)  
Member

17.04.2019

Appellant absent. Written reply not submitted. Representative of the respondent No.2 absent. He be summoned with direction to furnish written reply. Fresh notice be issued to respondents No.1 & 2 with direction to furnish written reply/comments. Adjourn. To come up for written reply/comments on 19.04.2019 before S.B

Member

18.03.2019

Counsel for the appellant present.

Contends, inter-alia, that the appellant was firstly transferred on 02.08.2018 from GGPS Khair Abad to GGPS Chamarkand. On 04.10.2018 an order regarding ban on transfers was imposed by the Deputy Director (Establishment) Directorate of Education, New Merged Districts despite the appellant was transferred from Sadiq Abad to GGPS Loisam on 05.11.2018. It was further contended that within a period three months the appellant was placed under transfer more than once. The said transfers were against the Government Policy covering the matter.



In view of the above, the appeal in hand is admitted for regular hearing subject to all just exceptions. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 03.04.2019 before S.B.

The appeal is accompanied by an application for suspension of transfer order dated 05.11.2018. From the record it transpires that before submission of instant appeal, the appellant approached the Honourable High Court in its writ jurisdiction due to non-functional<sup>ing</sup> of the Tribunal owing to retirement of the then Chairman. The Honourable High Court while disposing of Writ Petition No.

Form- A  
FORM OF ORDER SHEET

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

Case No. 193/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	12/2/2019	<p style="text-align: center;">The appeal of Mst. Shameem Saeed presented today by Mr. Zartaj Anwar 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 12/2/19</p>
2-		<p style="text-align: center;">This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>18-3-19</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

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

Appeal No. 193/2019

Shameem Saeed, P.S.T, GGPS Sadiq Abad Patak District Bajour  
.....(Appellant)

Versus

Government of Khyber Pakhtunkhwa through  
Secretary, ES&E Peshawar & others.....(Respondents)

I N D E X

S#	Description of Documents	Annex	Page No.
1)	Service Appeal , Application & Affidavit		1-8
2)	Copy of the order dated 02.08.2018	"A"	9
3)	Copy of order dated 17.08.2018	"B"	10
4)	Copy of the appeal dated 07.09.2018	"C"	11-12
5)	Copy of the Appeal dated 11.09.2018	"D"	13
6)	Copy of the order dated 18.09.2018	"E"	14
7)	Copy of Order dated 04.10.2018	"F"	15
8)	Copy of appeal is attached	"G"	16-18
9)	Copy of the writ petition and judgment dated 14.11.2018	"H"	19-27
10)	Other Documents		28-29
11)	Vakalatnama		30

  
Appellant

Through



**Zartaj Anwar**  
Advocate High Court  
Office FR , 3-4 Forth Floor  
Bilour Plaza Peshawar Cantt.  
Cell: 0331-9399185  
Email: [Zartaj9@yahoo.com](mailto:Zartaj9@yahoo.com)

**BEFORE THE KHYBER PAKHTUNKHWA**

**SERVICE TRIBUNAL PESHAWAR**

Khyber Pakhtunkhwa  
Service Tribunal

Appeal No. 193/2019

Diary No. 180

Dated 12-2-2019

Shameem Saeed, P.S.T, GGPS Sadiq Abad Patak District Bajour  
.....(Appellant)

Versus

- 1) Government of Khyber Pakhtunkhwa through Secretary, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar
- 2) Director Education, Directorate of Education newly merged Districts Khyber Pakhtunkhwa, Warsak Road, Peshawar
- 3) District Education Officer, Bajour at Khar ..... (Respondents)
- 4) Mst. Dilbar Begum PST, Government Girls primary School Sadiq Abad District Bajour.

Appeal under section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974, against the Office Order dated 05.11.2018 whereby the appellant has been transferred from GGPS Sadiqabad to GGPS Loi Sum as highly illegal, malafide, unlawful without lawful authority, against the rules, in violation of transfer and posting policy, against which departmental appeal was filed on 06.11.2018 but was not responded after the lapse of statutory period of 90 days.

Filed to-day

Registrar

**PRAYER IN APPEAL:**

on acceptance of this appeal the appellant may please be transferred to GGPS Sadiqabad under (posting transfer policy), reluctance on the part of the respondents by not following law and policy, which is illegal unlawful, in violation of the law, against the express provision of law, and thus of no legal effect and denied all the fundamental rights of the appellant secured and granted by the constitution.

**Respectfully Submitted:**

1. That the Appellant is the bonafide and local resident of newly merged District Bajour Khyber Pakhtunkhwa and a law abiding citizen of Pakistan.
2. That the Appellant was performing duties as a P.S.T Teacher in Education Department at GGPS Chamarkand and served the said school with entire satisfaction of the superior without any complaint what so ever.
3. That the competent authority issued the posting transfer orders of various teachers including the present Appellant whereas the Appellant was transferred from GGPS Chamarkhand against the vacant post. (Copy of the order dated 02.08.2018 is attached as annexure "A").
4. That the competent authority in the interest of public again transfer the Appellant to GGPS Sadiq Abad in her own pay scale vide order dated 17.08.2018. (Copy of order dated 17.08.2018 is attached as annexure "B").
5. That the respondent No.3 District Education Officer Bajour, whereas the appeal was made for cancellation of transfer orders in respect of Dilbar Begum that she was the proposed/nominated by the Directorate of Education FATA for training, but she remain absent from the said training upon which she was transferred and put her under report to GGPS Loi sam. (Copy of the appeal dated 07.09.2018 is attached as annexure "C").
6. That the Appellant submit/appeal to the competent authority (director education) for the cancellation of transfer order on the ground of premature/frequent orders and also of spouse policy as her husband serving the Education Department as a superintendent in GCT Hayat Kalay as both the school and college at the same route and nearby to both the institutions and requested for the withdrawal of transfer order and to be posted at Sadiq Abad Khar Bajour. (Copy of the Appeal dated 11.09.2018 is attached as annexure "D").
7. That the office of the director education forwarded the appeal of the Appellant to the office of District Education Officer Bajour District with the remarks to decide the instant case at their own level in the interest of public service upon which the competent authority of respondent no.3 retained her precious order of posting



vide order number 444-48 dated 17.08.2018 has been retrained for the interest of public service vide order dated 18.09.2018. (Copy of the order dated 18.09.2018 is attached as annexure "E").

8. That the respondent department in violation of the posting transfer policy and to adjust and accommodate their own blue eyed ones, again transferred the Appellant to GGPS Loisam in her own pay scale vide order dated 05.11.2018.
9. That the private respondent submit appeal against her transfer order and to post her back at GGPS Sadiq Abad, where the Appellant taken charge of her duties under the order of the competent authority, but with ulterior motive in days time her transfer order was cancelled and again issued the transfer orders of the private respondent.
10. That the competent authority vide order dated 04.10.2018 imposed complete ban on all kind of transfers in the interest of student till December 2018 with immediate effect but in violation of such order as well the present Appellant was transferred in the said ban period and also against the posting transfer policy. (Copy of Order dated 04.10.2018 is attached as annexure "F").
11. That the Appellant being aggrieved from the said illegal order of the respondents submits her departmental appeal to the Worthy Director Education to looking to the matter out the same was forwarded to District Education Officer Bajour District as under whom order the illegal unlawful and against the policy of posting and transfer, the impugned order of posting transfer was issued. (Copy of appeal is attached as annexure "G").
12. That the Hon;able Provincial Service Tribunal was defunct, and the Appellant approached the Hon;able Peshawar High Court Peshawar in writ petition no 5547-p/2018 where by the transfer order dated 05.11.2018 was suspended and the appellant was directed to approach the Khyber Pakhturikhwa Service Tribunal by filling of Service Appeal. (Copy of the writ petition and judgment dated 14.11.2018 are attached as annexure "H")
13. That the Appellant approach this Honourable Tribunal against her illegal transfer order inter alia on the following grounds:-

4

**GROUNDS:**

- A. That the Appellant has not been treated in accordance with law, and thus her rights secured and guaranteed under the law and Constitution are badly violated.
- B. That the Notification of transfer is illegal and unlawful, moreover the same is in violation of posting and transfer policy of the Provincial Govt.
- C. That according to the Posting / transfer policy of the provincial govt firstly all the posting transfer shall be strictly in public interest and shall not be abused / misused to victimize the govt servant, in case of present appellant the order of Posting/ transfer was not issued in the mood and manner of the posting transfer policy ,as the Husband of present Appellant serving as superintendent at GCT Hayat Kalay and also local resident of the said locality, more so the posting transfer policy support i.e both the husband and wife serving in provincial services, affects were possible would be made to post such persons i.e civil servants at one station.
- D. That the Appellant while performing her duties with zeal and devotion and there was no complaint whatsoever regarding my performance, was prematurely transferred and has not completed her normal tenure, the order impugned is illegal and against the law laid down by the apex court, in its case reported in PLD 1995 Supreme Court Page No. 530.
- E. That under the Wedlock policy of posting and transfer was intended to ensure to the benefit of a family, it advanced social good and unless there were insurmountable hurdles, in its Case reported in 2004 PLC (CS) 622, 2003 PLC (CS) 1322, 1994 PLC(CS)1644, 1991PLC(CS)478.
- F. That the transfer order is illegal and unlawful, moreover the same is in violation of posting and transfer policy (Wedlock Policy) of the Provincial Govt.
- G. That the transfer order is illegal and unlawful, politically motivate, moreover the same is in violation of posting and transfer policy of the Provincial Govt.

- 5
- H. That there was no complaint whatsoever against the Appellant, and quite wrongly the transfer order was given the colour of public interest and on complaint.
- I. That the impugned transfer order is illegal, unlawful, without lawful authority and passed without jurisdiction, not in the prescribed period, in violation of transfer and posting policy.
- J. That in fact there exist no exigencies of service nor the order of transfer can be termed as in the public interest, rather it was issued in violation of law and transfer / posting policy of the Provincial Govt.
- K. That the transfer order of the appellant is in outcome of political pressure which smacked malafide and such order issued on the recommendation of the political Minister respectively show that the impugned order is the outcome of political pressure. The issue was held in 2012 PLC (CS) 648.
- L. That the transfer order issued without caring for law, had in a quick succession issued a number of orders against the public interest or exigency of service.
- M. That infact there exist no exigencies of service nor the order of transfer cannot be termed as in the public interest it is a result of political pressure at the cost of the Appellant, and thus not tenable in the eyes of law.
- N. That the impugned transfer order is illegal, unlawful, without lawful authority and passed without jurisdiction, not in the prescribed period, in violation of transfer and posting policy, the impugned order was passed in the ban period and no relaxation has been obtained from the competent authority thus nullity in the eyes of law and not tenable.
- O. That the august Supreme Court of Pakistan has in its Judgment in Constitution Petition No. 23/2012 decided on 18.10.2012, decided a point of law and while commenting upon the transfer and posting and other related matters of service held as under:-

- i. *Appointments, Removals and Promotions:-*  
Appointments, removals and promotions must be

made in accordance with the law and the rules made there under; 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.

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

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.

P. That the Appellant seeks the permission of this Honourable Tribunal to rely on additional grounds at the hearing of this petition.

It is therefore prayed that the instant service appeal may please accepted as prayed for against the respondents and in favour of the Appellant.

Through

*SS*  
Appellant  
*Zartaj Anwar*

**ZARTAJ ANWAR**  
**Advocate, Peshawar**

List of Books:

1. Constitution 1973.
2. Civil Servants (Appointment, Promotion & Transfer) Rules 1973.
3. Civil Servant Act, 1973

*Zartaj Anwar*  
ADVOCATE

7

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

Appeal No. \_\_\_\_\_/2019

Shameem Saeed, P.S.T, GGPS Sadiq Abad Patak District Bajour  
.....(Appellant)

Versus

Government of Khyber Pakhtunkhwa through  
Secretary, ES&E Peshawar & others.....(Respondents)

**Application for suspension of Transfer order dated 05.11.2018 of the appellant as against the posting transfer and wedlock policy being highly illegal, malafide, unlawful without lawful authority, against the rules, thus ineffective upon the rights of the Appellant.**

Respectfully Submitted:

1. That the applicants have filed today the above noted Service Appeal in this Honourable Tribunal in which no date is fixed so far.
2. That the facts and ground mentioned in the Service Appeal may also be read as integral part of this application.
3. That the applicant has got a good prima facie case in her favour and there is likelihood of it success.
4. That the applicant would be exposed to great hard ship and inconvenience in case the transfer order dated 05.11.2018 is not suspended.
5. That it will also serve the interest of justice if the transfer order dated 05.11.2018 is suspended till the final disposal of the grievance petition.

8

It is, therefore, humbly prayed that on acceptance of this application the transfer order dated 05.11.2018 may please be suspended till the final decision of the Service Appeal.

*S.B*  
Applicant

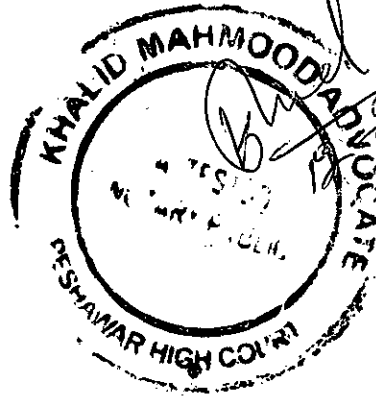
Through

*Zartaj Anwar*  
ZARTAJ ANWAR  
Advocate, Peshawar.

**AFFIDAVIT**

We, do hereby solemnly affirm and declare on oath that the contents of the above application are true and correct and that nothing has been kept back or concealed from this Honourable Tribunal.

*S.B*  
Deponent



9  
Approved A

**OFFICE OF THE AGENCY EDUCATION OFFICER BAJAUR**  
**AGENCY AT KHAR**



**TRANSFER ORDER**

The following PSHTs/PST Female teachers are hereby transferred to the schools noted against their name on their own pay and scale with effect from their date of taking over charge in the interest of public service.

<u>S.No</u>	<u>Name of teacher</u>	<u>From</u>	<u>To</u>	<u>Remarks</u>
1.	Dilbar Begum	GGPS Sadiq Abad	GGPS loisum	Vice S.No.3 (under report)
2.	Shamim Saeed	GGPS Khair Abad	GGPS Chamarkarid	AVP ✓
3.	Amina	GGPS loisum	GGPS Khair Abad	Vice, S.No.2
4.	Nazai	GGPS Sewai	GGPS Bala Chinagai	AVP (under report)

Note:

*Charge report should be submitted in duplicate.  
No TA/DA is allowed.*

(Mr. Anrullah)  
AGENCY EDUCATION OFFICER  
BAJAUR AGENCY

Endst 175-77 /Estab; Dated 02/08 /2018

Copy of the above is forwarded to the:-

1. AAEO Female Concerned.
2. Head Clerk of the local office.
3. Official Concerned.

*Anrullah*  
AGENCY EDUCATION OFFICER  
BAJAUR AGENCY

**ATTESTED**

10

Amrullah B

(Amrullah/A)



District Education Officer  
Bajaur at Khar

Email [aeobajaur@gamil.com](mailto:aeobajaur@gamil.com)

Voice & Fax +92942220395

**TRANSFER ORDER**

Mist: Shamim Saeed PST GGPS Chamarkand is hereby transferred to GGPS Sadiq Abad on her own pay and scale in the interest of public service.

Note: -

- (i) No TA / DA allowed.
- (ii) Necessary entries should be made in their service books.

(Amrullah Wazir)  
District Education Officer  
Bajaur

Endst: No: 444-48 Dated 17/08/ 2018

Copy of the above is forwarded to the:

1. Director Education newly merged districts KPK Peshawar.
2. District Accounts Office Bajaur.
3. Accountant of the local office.
4. ADEO (F) Concerned.
5. Official Concerned:

*Amrullah*  
District Education Officer  
Bajaur

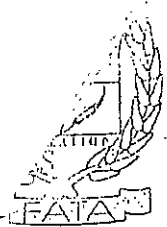
**ATTESTED**

*[Signature]*



11

Approved - C



DIRECTORATE OF EDUCATION  
NEWLY MERGED TRIBAL DISTRICTS  
WARSAK ROAD PESHAWAR, PAKISTAN  
PHONE: 091-9210166 FAX 091-9210216

No. 11538 /Date Pesh: the / 7/5 /2018.  
E-6/KC/Bajaur. *(Annexure/c)*

To  
The District Education Officer  
Bajour District.

Subject: CANCELLATION OF TRANSFER ORDER.

Memo:  
I am directed to refer to the above noted subject and to enclose herewith an application in respect of Mst; Dilbar Begum PST, GGPS Sadiq Abad, Bajaur Agency and to ask you to cancel the transfer order under intimation to this Office.

Encl: As Above.

*[Signature]*  
Deputy Director (Estab)

Dated Pesh: the \_\_\_\_\_ /2018.

Encls: No. \_\_\_\_\_ /-

Copy to:-  
PA to Director Education; NMTD.

Deputy Director (Estab)

**ATTACHED**

12

(Annexure/B)



OFFICE OF THE DISTRICT EDUCATION OFFICER  
 BAJAUR AGENCY AT KHAR  
 NO \_\_\_\_\_ /P&D/ DATED \_\_\_\_\_ /2018  
 Phone & Fax No.0942-220395  
 Email :khanzad1236@gmail.com

To,  
 The Deputy Commissioner  
 Bajaur Agency.

Subject: - APPEAL FOR CANCELLATION OF TRANSFER IN RESPECT OF DILBAR BEGUM GGPS SADIQ ABAD IN BAJAUR AGENCY.

Memo:-

Kindly refer to your dairy No.6876 dated 3/09/2018 and your remarks on the body of the application regarding subject cited above.

In this regard, the head Teacher named Dilbar Begum PSHT GGPS Sadiq Abad had been proposed / nominated by Directorate of Education FATA vide his office letter No. 14572-74 dated 21 /6/2018 for Early Children Education Training ( ECE) w.e.f 2-7-2018 to 16-06-2018 (15 days) at GCET Jamrud and pursuance of DE FATA she was recommended vide this office letter No.27-5-218 dated 27/6/2018 ( Copies attached). More over all the nominated/selected teachers were directed to attend the meeting at the office of the undersigned one day before for ensurance of training. She has received the nomination letter and also attended the Meeting but she did not participate /join the important training insisently as scheduled and did not obey the orders. In view of the above facts she was transferred under reportedly to GGPS Loismam . So report is submitted for your kind perusal as desired please.

District Education Officer  
 Bajaur Agency

Dist No. 623-24 Dated 7-9-2018

Copy of the above is forwarded to the :-

1. Director of Education NMD /FATA for information
2. ADEO /AAEO ( Female).

*Amir*  
 District Education Officer  
 Bajaur Agency

**ATTESTED**

(11)

The Director,  
Recently merged  
Tribal Districts.

Cancellation of Transfer Order

I am requesting in response to the letter No. 11538, dated 07/09/2018. After up-gradation, I was posted as PST QGPS Sadiq Abad Bajaur against the vacant post on 17/09/2018.

I always performed my duties with loyalty, spirit, and commitment in remote areas. Now I reside in civil colony Behar Bajaur and QGPS Sadiq Abad is the nearest school where I can continue my duties with ease and concentration.

Secondly, my spouse is serving as Superintendent in GCT. Inyat Killa. We travel the same route to perform our duties in an easy way.

Therefore, it is requested to kindly withdraw orders of cancellation of our transfer.

Thank you,

Your obediently,  
Shameem Saeed (PST)  
QGPS Sadiq Abad

07/09/2018

Applicant

Approved A

**OFFICE OF THE AGENCY EDUCATION OFFICER BAJAUR**  
**AGENCY AT KHAR**



**TRANSFER ORDER**

The following PSHTs/PST Female teachers are hereby transferred to the schools noted against their name on their own pay and scale with effect from their date of taking over charge in the interest of public service.

S.No	Name of teacher	From	To	Remarks
1.	Dilbar Begum	GGPS Sadiq Abad	GGPS loisum	Vice .S.No.3 ( under report)
2.	Shamim Saeed	GGPS Khair Abad	GGPS Chamarkand	AVP ✓
3.	Amina	GGPS loisum	GGPS Khair Abad	Vice. S.No.2
4.	Nazai	GGPS Sewai	GGPS Bala Chinagai	AVP ( under report)

Note:

*Charge report should be submitted in duplicate.  
No TA/DA is allowed.*

(Mr. Amrullah)  
AGENCY EDUCATION OFFICER  
BAJAUR AGENCY

Endst 175-77 /Etab; Dated 09/08 2018

Copy of the above is forwarded to the:-

1. AAEO Female Concerned.
2. Head Clerk of the local office.
3. Official Concerned.

*Amrullah*  
AGENCY EDUCATION OFFICER  
BAJAUR AGENCY

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Approved: E

(Annexure/E)



**District Education Officer  
Bajaur at Khar**

No. 843 dated 18/09/2018  
Email aeobajaur@govt.pk Voice & Fax 92942220395

To

The Director Education  
Newly merged districts KPK Peshawar:

Subject: - CANCELLATION OF TRANSFER ORDER.

Memo:-

Reference your office letter No. 11794 dated 17/09/2018 on the subject noted above and the letter No. 11538 dated 07/09/2018 on the same mention subject, the transfer has been issued by the undersigned due to disobedient ship and explanation.

Therefore; the transfer order vide No. 444-48 dated 17/08/2018 has been remain for the interest of public service.

ed

*M*

  
District Education Officer  
Bajaur

Endst: No. 844-47

Dated 18/09/2018

Copy forwarded to the:

1. ADEO (F), Concerned.
2. Accountant of the local office.
3. Mist: Dilbar Begum PST GGPS Loi Sum.
4. Mist: Shamim Saced PST GGPS Sadiq Abad.

*M*

  
District Education Officer  
Bajaur

**ATTESTED**



DIRECTORATE OF EDUCATION  
NEW MERGED DISTRICTS

KHYBER PAKHTUNKHWA, WARSAK ROAD PESHAWAR, PAKISTAN  
PHONE: 091-9210166 FAX 091-9210216

NO. 12371-83 DATED 4/10/18  
A-12 GULA JAN SST.

*Amir F*

To

All the District Education Officers  
Newly Merged Tribal Districts.

Subject: Ban on Transfer.

The Competent Authority has been pleased to impose Ban on all kind of transfers in the interest of students till December 2018 with immediate effect.

*[Signature]*  
Deputy Director (Estab)

Endst. No. \_\_\_\_\_ /-

Copy to:

1. PS to Secretary SSD Newly Merged Tribal Districts.
2. PA to Director Education Newly Merged Districts.

Deputy Director (Estab)

ATTESTED  
*[Signature]*

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Annex 9



**DIRECTORATE OF EDUCATION  
NEWLY MERGED DISTRICTS**

KHYBER PAKHTUNKHWA  
WARSAK ROAD PESHAWAR, PAKISTAN  
PHONE. 091-9210166 FAX 091-9210216

NO. 14250

DATED 6/11 /2018

To

✓ The District Education Officer  
Bajaur District

Subject: CANCELLATION OF TRANSFER ORDER

Memo:

I am directed to refer to the above noted subject and to enclose herewith an application in respect of Mst. Shamim Saeed PST, GGPS, Sadiq Abad with the remarks to look into the matter personally.

Endst: No. \_\_\_\_\_ /

Copy to the:

P.A to Director Education, FATA.

*[Signature]*  
Dy: Director (Estab) 06/11/18

\_\_\_\_\_  
Dy: Director (Estab)

*[Signature]*  
**ATTESTED**

To

The Director Education,  
Newly merged districts KPK Peshawar.

Subject: Sympathetic Appeal

Respected Sir,

It is stated that I was performing my duties as a PST Teacher in Education Department at GGPS Chamarkand. This school is so much far flung from my home. When I knew that a post of PST lying vacant at GGPS Sadiq Abad. I submitted an application to DEO bajaur to the transfer on said vacant post.

The Honorable DEO Bajaur processed my application and issued transferred order No. 444-48 dated 17/08/2018 for the interest of public service. I took over the charge at GGPS Sadiq Abad on vacant PST post. My transfer ordered vide order No.444-48 dated 17/08/2018 (Annexure/A).

Mst: Dilbar Begum PST lodged an appeal to Deputy Commissioner Bajaur for cancellation of her transfer which was forwarded to DEO bajaur for the said purpose. Subsequently DEO bajaur replied that her transfer has been made due to absenteeism from Early Children Education training (ECE) arrange by education department vide No.14572-74 dated 21/06/2018 w.e.f 02/07/2018 to 16/06/2018 (15 days) held at GCET Jamurd vide letter No.623-24 dated 07/09/2018 (Annexure/B).

Further Mst: Dilbar Begum PST submitted an application to your honorable office for cancellation her transfer order and by your honorable office addressed a letter to DEO bajaur letter No.11538 dated 07/09/2018 (Annexure/C) for the cancellation of her transfer DEO bajaur did not take any action on the said letter because the undersigned has also submitted appeal to Director Education which has been processed as per rules and vide No.11794 dated 17/09/2018 (Annexure/D) issued by Directorate Education to DEO bajaur to decide the instant case at his own level. Responsibility DEO bajaur sustain my transfer order vide No.844-47 dated 18/09/2018 (Annexure/E) at GGPS Sadiq Abad bajaur for the interest of public service.

Respected Sir today 05/11/2018 I have received transfer order, where I have been transferred to GGPS Loi sum Bajaur attached as Annexure-F. it is worth to mention that in the

DD/E? n/w  
2/06/11/18

05/11/18  
DTA

ATTESTED



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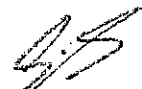
instant case inquiry has also been initiated by DEO bajaur but without receiving inquiry report DEO bajaur has issued my transfer from GGPS Sadiq Abad to the above mentioned school which is against of the rules and regulations.

It is requested in your honor to issue order to DEO Bajaur to cancel the above ill lawful order which is against the rules and regulation to avoid litigation issues in future, Please.

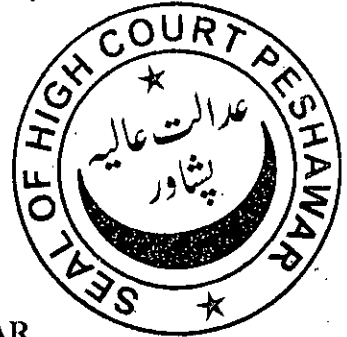
Thanking in anticipation,

Date: 06/11/2018

Yours sincerely

  
Shameem Saeed PST  
GGPS Sadiq Abad Patak

ATTACHED



IN THE PESHAWAR HIGH COURT PESHAWAR

Writ Petition No. \_\_\_/2018

Shameem Saeed, P.S.T, GGPS Sadiq Abad Patak District Bajour  
.....(Petitioner)

Versus

- 1) Government of Khyber Pakhtunkhwa through Secretary, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar
- 2) Director Education, Directorate of Education newly merged Districts Khyber Pakhtunkhwa, Warsak Road, Peshawar
- 3) District Education Officer, Bajour at Khar ..... (Respondents)

WRIT PETITION UNDER ARTICLE 199 OF  
THE CONSTITUTION OF THE ISLAMIC  
REPUBLIC OF PAKISTAN, 1973

Prayer in Writ Petition;

ON ACCEPTANCE OF THIS WRIT PETITION AN APPROPRIATE WRIT MAY PLEASE BE ISSUED DECLARING THE OFFICE ORDER DATED 05.11.2018 OF THE RESPONDENT NO. 3 WHEREBY THE PETITIONER HAS BEEN TRANSFERRED FROM GGPS SADIQABAD TO GGPS LOI SUM AS HIGHLY ILLEGAL, MALAFIDE, UNLAWFUL WITHOUT LAWFUL AUTHORITY, AGAINST THE RULES, IN VIOLATION OF TRANSFER AND POSTING POLICY AND THUS INEFFECTIVE UPON THE RIGHTS OF THE PETITIONER, THE SAME MAY PLEASE BE STRIKE DOWN, THE PETITIONER MAY PLEASE BE ALLOWED TO CONTINUE HIS DUTIES AT GGPS SADIQABAD OR ANY OTHER REMEDY DEEMED PROPER MAY ALSO BE ALLOWED.

**FILED TODAY**  
Deputy Registrar  
09 NOV 2018

WP5547-2018- Mst Shameem Saeed vs Govt KP, Full PG 34

**ATTESTED**  
EXAMINER  
Peshawar High Court  
22 NOV 2018

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**Respectfully Submitted:**

1. That the petitioner is the bonafide and local resident of newly merged District Bajour Khyber Pakhtunkhwa and a law abiding citizen of Pakistan.
2. That the petitioner was performing duties as a P.S.T Teacher in Education Department at GGPS Chamarkand and served the said school with entire satisfaction of the superior without any complaint what so ever.
3. That the competent authority issued the posting transfer orders of various teachers including the present petitioner whereas the petitioner was transferred from GGPS Chamarkhand against the vacant post. (Copy of the order dated 02.08.2018 is attached as annexure "A").
4. That the competent authority in the interest of public again transfer the petitioner to GGPS Sadiq Abad in her own pay scale vide order dated 17.08.2018. (Copy of order dated 17.08.2018 is attached as annexure "B").
5. That the respondent No.3 District Education Officer Bajour, whereas the appeal was made for cancellation of transfer orders in respect of Dilbar Begum that she was the proposed/nominated by the Directorate of Education FATA for training, but she remain absent from the said training upon which she was transferred and put her under report to GGPS Loi sam. (Copy of the appeal dated 07.09.2018 is attached as annexure "C").
6. That the petitioner submit/appeal to the competent authority (director education) for the cancellation of transfer order on the ground of premature/frequent orders and also of spouse policy as her husband serving the Education Department as a superintendent in GCT Hayat Kalay as both the school and college at the same route and nearby to both the institutions and requested for the withdrawal of transfer order and to be posted at Sadiq Abad Khar Bajour. (Copy of the Appeal dated 11.09.2018 is attached as annexure "D").
7. That the office of the director education forwarded the appeal of the petitioner to the office of District Education Officer Bajour District with the remarks to decide the instant case at their own level in the interest of public service upon which the

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**Deputy Registrar**  
**09 NOV 2018**

WP5547-2618-Mst Sharoom Saied vs Govt KP Full PG 34

**ATTESTED**  
**EXAMINER**  
**Peshawar High Court**

**22 NOV 2018**

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competent authority of respondent no.3 retained her precious order of posting vide order number 444-48 dated 17.08.2018 has been retrained for the interest of public service vide order dated 18.09.2018. (Copy of the order dated 18.09.2018 is attached as annexure "E").

8. That the respondent department in violation of the posting transfer policy and to adjust and accommodate their own blue eyed ones, again transferred the petitioner to GGPS Loisam in her own pay scale vide order dated 05.11.2018.
9. That the private respondent submit appeal against her transfer order and to post her back at GGPS Sadiq Abad, where the petitioner taken charge of her duties under the order of the competent authority, but with ulterior motive in days time her transfer order was cancelled and again issued the transfer orders of the private respondent.
10. That the competent authority vide order dated 04.10.2018 imposed complete ban on all kind of transfers in the interest of student till December 2018 with immediate effect but in violation of such order as well the present petitioner was transferred in the said ban period and also against the posting transfer policy. (Copy of Order dated 04.10.2018 is attached as annexure "F").
11. That the petitioner being argued from the said illegal order of the respondents submits her departmental appeal to the Worthy Director Education to looking to the matter out the same was forwarded to District Education Officer Bajour District as under whom order the illegal unlawful and against the policy of posting and transfer, the impugned order of posting transfer was issued. (copy of appeal is attached as annexure "G").
12. That the Petitioner was having no other efficacious and adequate remedy available in law are constrained to approach this Honourable Court inter alia on the following grounds:-

**GROUND OF WRIT PETITION:**

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Deputy Registrar  
09 NOV 2018

- A. That the Petitioner has not been treated in accordance with law, and thus his rights secured and guaranteed under the law and Constitution are badly violated.

WP5547-2018- Mst Shameem Saeed vs Govt KP Full PG 34

ATTESTED  
EXAMINER  
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- E
- B. That the Notification of transfer is illegal and unlawful, moreover the same is in violation of posting and transfer policy of the Provincial Govt.(Copy of the transfer and posting policy is attached as Annexure E)
- C. That according to the Posting / transfer policy of the provincial govt firstly all the posting transfer shall be strictly in public interest and shall not be abused / misused to victimize the govt servant, in case of present appellent the order of Posting/ transfer was not issued in the mod and manner of the posting transfer policy ,as the Husband of present petitioner serving as superintendent at Gct Hayat Kalay and also local resident of the said locality, more so the posting transfer policy support i.e both the husband and wife serving in provincial services, affects were possible would be made to post such persons i.e civil servants at one station.
- D. That the petitioner while performing her duties with zeal and devotion and there was no complaint whatsoever regarding my performance, was prematurely transferred and has not completed her normal tenure, the order impugned is illegal and against the law laid down by the apex court, in its case reported in PLD 1995 Supreme Court Page No. 530.
- E. That under the Wedlock policy of posting and transfer was intended to ensure to the benefit of a family, it advanced social good and unless there were insurmountable hurdles, in its Case reported in 2004 PLC (CS) 622, 2003 PLC (CS) 1322, 1994 PLC(CS)1644, 1991PLC(CS)478.
- F. That the transfer order is illegal and unlawful, moreover the same is in violation of posting and transfer policy (Wedlock Policy) of the Provincial Govt.
- G. That the transfer order is illegal and unlawful, politically motivate, moreover the same is in violation of posting and transfer policy of the Provincial Govt.
- H. That there was no complaint whatsoever against the petitioner, and quite wrongly the transfer order was given the colour of public interest and on complaint.
- I. That the impugned transfer order is illegal, unlawful, without lawful authority and passed without jurisdiction,

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Peshawar High Court

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not in the prescribed period, in violation of transfer and posting policy.

- J. That in fact there exist no exigencies of service nor the order of transfer can be termed as in the public interest, rather it was issued in violation of law and transfer / posting policy of the Provincial Govt.
- K. That the transfer order of the appellant is in outcome of political pressure which smacked malafide and such order issued on the recommendation of the political Minister respectively show that the impugned order is the outcome of political pressure. The issue was held in 2012 PLC (CS) 648.
- L. That the transfer order issued without caring for law, had in a quick succession issued a number of orders against the public interest or exigency of service.
- M. That infact there exist no exigencies of service nor the order of transfer cannot be termed as in the public interest it is a result of political pressure at the cost of the Petitioner, and thus not tenable in the eyes of law.
- N. That the impugned transfer order is illegal, unlawful, without lawful authority and passed without jurisdiction, not in the prescribed period, in violation of transfer and posting policy, the impugned order was passed in the ban period and no relaxation has been obtained from the competent authority thus nullity in the eyes of law and not tenable.
- O. That the august Supreme Court of Pakistan has in its Judgment in Constitution Petition No. 23/2012 decided on 18.10.2012, decided a point of law and while commenting upon the transfer and posting and other related matters of service held as under:-

i. *Appointments, Removals and Promotions:-*

Appointments, removals and promotions must be made in accordance with the law and the rules made there under; 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.

WP547-2018- Msf Shameem Saeed vs Govt KP Full PG 34

**FILED TODAY**  
Deputy Registrar  
09 NOV 2018

**ATTESTED**

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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 there under; such tenure must be respected and cannot be varied, except for compelling reasons, which should be recorded in writing and are judicially reviewable.
- 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.

P. That the Petitioner seeks the permission of this Honourable Court to rely on additional grounds at the hearing of this petition.

Q. That the Hon;able provincial service tribunal is defunct, hence the petitioner approached this Hon;able court.

**Interim Relief:**

The Office Order dated 05.11.2018 may please be suspended and may not be relieved from the post till the decision of the above noted Writ Petition.

It is therefore prayed that on acceptance of this Writ Petition an appropriate writ as prayed for may please be issued against the respondents and in favour of the Petitioner.

Through

ZARTAJ ANWAR  
Advocate, Peshawar

**List of Books:**

- 1. Constitution 1973.
- 2. Civil Servants (Appointment, Promotion & Transfer) Rules 1973.
- 3. Civil Servant Act, 1973

ADVOCATE

**FILED TODAY**  
Deputy Registrar  
09 NOV 2018

WP5547-2018- Mst Shameem Saeed vS Govt KP Full-PG 34

**ATTESTED**

EXAMINER  
Peshawar High Court

22 NOV 2018

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PESHAWAR HIGH COURT, PESHAWAR

ORDER SHEET



Date of Order or Proceedings	Order or others Proceedings with Signature of Judge
1	2
14.11.2018	<p><b>W.P No.5547-P/2018 with IR</b></p> <p><b>Present: Mr. Zartaj Anwar, Advocate, for the petitioner.</b></p> <p>*****</p> <p><b>MUSARRAT HILALI, I.</b>- The instant writ petition has been filed by the petitioner under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973, wherein she has prayed for declaring the office order dated 5.11.2018 of respondent No.3 whereby the petitioner has been transferred from GGPS Sadiqabad to GGPS Loisom as illegal, malafide, unlawful and against the rules in violation of transfer and posting policy, thus the same may be struck down and the petitioner may be allowed to continue her duties at GGPS Sadiqabad.</p> <p>2. At the very outset of the proceedings, when learned counsel for the petitioner was</p>

*Handwritten signature/initials*

**ATTESTED**

**EXAMINER  
Peshawar High Court**

**22 NOV 2018**



confronted that petitioner is a civil servant and her grievances relate to the terms and conditions of service, so, the appropriate remedy for seeking her redressal would surely be the Khyber Pakhtunkhwa Services Tribunal, as there is a complete and absolute bar in considering any matter relating to the terms and conditions of service of a Government servant. In response, he could not rebut the said legal objection, however, submitted that the impugned transfer order of petitioner may be suspended for the reason that at present the Khyber Pakhtunkhwa Service Tribunal is non-functional due to retirement of the then Chairman and new incumbent has not yet been appointed.

*man*

3. Accordingly, this writ petition, being not maintainable, is hereby dismissed in *limine*, however, in view of the peculiar circumstances of the present case, the impugned transfer order dated 05.11.2018 shall remain suspended till the

**ATTESTED**  
 EXAMINER  
 Peshawar High Court

22 NOV 2018



بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

# تنظیم المدارس اہل سنت پاکستان

8- راوی پارک، راوی روڈ لاہور

فون نمبر 042-37731045-7 فیکس نمبر 042-37731050

حوالہ نمبر 15/4136-K.A

تاریخ 10-9-2015

بنام: آفس آف دی پرنسپل گورنمنٹ ہائی سکول (انکوائری آفیسر) باڈراشی نوشہرہ

السلام علیکم ورحمۃ اللہ وبرکاتہ!

عنوان: ایشیادۃ العالیہ (بی اے) سندورزلٹ کارڈ کی توثیق

بحوالہ: جناب کی طرف سے مراسلہ نمبر 4697 مورخہ 07-09-2015 بعنوان بالا۔

آپ کی طرف سے بذریعہ مراسلہ محولہ بالا بشری بیگم بنت نواب علی خان کی ایشیادۃ العالیہ سندورزلٹ کارڈ کی

نوٹو کا پیاں توثیق کی غرض سے موصول ہوئیں۔ اس حوالے سے تصدیق کی جاتی ہے کہ بشری بیگم بنت نواب علی خان کی

اس سندورزلٹ کارڈ کا کوئی ریکارڈ دفتر تنظیم المدارس اہل سنت پاکستان میں موجود نہیں ہے جس بناء پر موصوفہ کی یہ سند

ورزلٹ کارڈ بوگس اور جعلی ہے۔

والسلام مع الاکرام

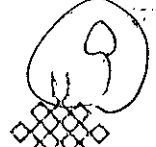
مُحَمَّد کَبِیْر نَعِیْسِی

(انچارج شعبہ اسناد)

مرکزی دفتر: تنظیم المدارس اہل سنت پاکستان

8- راوی پارک، راوی روڈ، لاہور

www.tanzeemulmadaris.com  
Email: info@tanzeemulmadaris.com



تنظیم المدارس اہل سنت پاکستان

صوبہ پنجاب (شمالی)

جامعہ محمدیہ نوشیہ ضیاء العلوم

فون نمبر 051-5564911  
موبائل نمبر 0345-5564913

صوبہ پنجاب (جنوبی)

جامعہ اسلامیہ نبویہ

سابقہ عنوان کالونی ایشیادۃ العالیہ نائن بہاول پور  
موبائل نمبر 0300-6814413

صوبہ پنجاب (جنوبی)

جامعہ اسلامیہ چینیہ

(جد باغی) داخلی نمبر 0997-650116  
موبائل نمبر 0300-4592192, 0301-0121101

صوبہ پنجاب (جنوبی)

جامعہ مجددیہ نعیمیہ

سابقہ عنوان ایشیادۃ العالیہ کوٹلی  
فون نمبر 021-34509074  
موبائل نمبر 0300-2593036

صوبہ بلوچستان

جامعہ اسلامیہ نوریہ

منوجان روڈ، کوئٹہ  
فون نمبر 081-2822841  
موبائل نمبر 0333-7861824

آزاد کشمیر

دارالعلوم سیف الاسلام

نورنگ پور، مظفر آباد، آزاد کشمیر  
فون نمبر 05822-446513  
موبائل نمبر 0300-5073578

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

# تنظیم المدارس (اهل السنۃ) پاکستان (مبجلہ)

N: 002764

رقم السلسلہ ۳۴۴



## الشہادۃ العالیٰ (بی۔ اے)

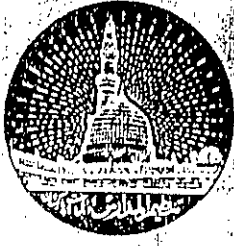
الحمد لله رب العالمين والصلوة والسلام على خاتم الانبياء والمرسلين وعلى اله واصحابه اجمعين  
 شہد بان ..... بشری بیگم ..... ابن/بنت ..... نواب علی خان .....  
 وتاریخ میلادہ ..... ۱۹۷۸-۴-۴ ..... ورقم التجیل ..... ۲۱۱۰ ..... ورقم الجلوس ..... ۳۳۷ .....  
 من طلاب ..... الجامعة المحمدية العزيمية للبنات نوشهريه .....  
 قد حصل على الشهادة العاليه (بی۔ اے) بعد .....  
 اجتياز الامتحان المنعقد باشراف تنظيم المدارس (اهل السنۃ) باكستان .....  
 في ..... ۱۴۲۰ هـ الموافق ..... ۲۰۰۰ ش بتقدير الممتاز وعد درجاته ..... ۰/۵۶۷ فقط .....  
 ونسال الله عز وجل ان يسلك به سبيل العلماء العاملين

المكتب المركزي  
 لتنظيم المدارس (اهل السنۃ) باكستان  
 التفتيشية بھترت  
 ضلع شامرا لاهور  
 محل الاصدار

سید فیض  
 الامین العام  
 الامین العام  
 لتنظيم المدارس (اهل السنۃ)  
 پاکستان

بیشاپ  
 الرئيس  
 الرئيس  
 لتنظيم المدارس (اهل السنۃ)  
 پاکستان

التاریخ  
 ربيع الاول ۱۴۲۱ھ



بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

T-771/00  
21-7-2000

## نتیجہ کارڈ مثنیٰ شہادۃ عالیہ (بی۔ اے)

طالب علم: لبشری بیگم جی ایت انوار علی خان

رول نمبر: ۳۳۷ رجسٹریشن نمبر: ۲۱۱۰ سال: ۲۰۰۰ تا ۲۰۰۱

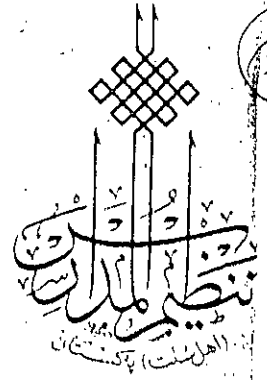
ادارہ: جامعہ محمدیہ کرسیمہ للذات النواہیہ

پرچہ نمبر	مضمون	کل نمبر	حاصل کردہ نمبر	نتیجہ
۱	تفسیر	۱۰۰	۶۲	کامیاب
۲	علوم القرآن	۱۰۰	۶۰	=
۳	حدیث و علوم حدیث	۱۰۰	۵۸	=
۴	کلام و مناظرہ	۱۰۰	۵۶	=
۵	فقہ	۱۰۰	۷۰	=
۶	علم الفرائض و اصول فقہ	۱۰۰	۶۰	=
۷	ادب عربی و بلاغت	۱۰۰	۶۳	=
۸	تاریخ اسلام	۱۰۰	۵۵	=
۹	فلسفہ و عمرانیات	۱۰۰	۸۰	=
	میزان	۹۰۰	۵۶۷	التمتاز

دستخط ناظم امتحان

دستخط ناظم امتحان  
نظیم المدارس (اہل سنت) پاکستان  
تعمیم سٹریٹ © علامہ اقبال روڈ گڑھی شاہلاہ

دستخط ناظم امتحان



مرکزی دفتر و شبہ امتحانات

نئی دہلی، انڈیا

Ph: 042-4372400

Fax: 042-6372029

شعبہ امتحانات

Ph: 042-63107701

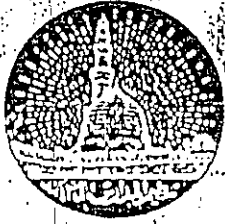
042-6316140

Fax: 042-6316249

کیب آفس شبہ امتحانات

نئی دہلی، انڈیا

Ph: 021-6640552, 021-6844707



بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

T-771/00  
21-7-2000

نتیجہ کارڈ مثنیٰ شہادۃ عالیہ (بی۔ اے)

لاب علم: لیتھرنی بیگم

دول نمبر: ۳۳۷

ادارہ: جامعہ محمدیہ مکتبہ للنات لیتھرنی

پرچہ نمبر	مضمون	کل نمبر	پاس کر دیے	نمبر
۱	تفسیر	۱۰۰	۶۳	کامیاب
۲	علوم القرآن	۱۰۰	۶۰	=
۳	حدیث و علوم حدیث	۱۰۰	۵۸	=
۴	کلام و مناظرہ	۱۰۰	۵۹	=
۵	فقہ	۱۰۰	۷۰	=
۶	علم القرآن و اصول فقہ	۱۰۰	۶۰	=
۷	ادب عربی و بلاغت	۱۰۰	۶۳	=
۸	تاریخ اسلام	۱۰۰	۵۵	=
۹	تفسیر و مراثیات	۱۰۰	۸۰	=
	میزان	۹۰۰	۵۶۷	السمتاز

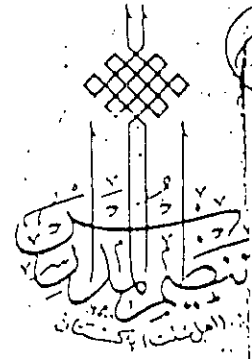
دستخط ناظم امتحان

نظم المدارس اسلامیہ پاکستان  
نیمہ سنٹرل © علامہ اقبال روڈ ڈیڑھی شاہ پورہ

دستخط ناظم امتحان



۱۵  
۱۵



مرکزی دفتر و شبہ استقامت

مکتبہ عربیہ اسلامیہ، دارالکتاب، اسلام آباد

Ph: 047-4372499

Fax: 047-4372029

شبہ استقامت

Ph: 047-4318726

047-4316140

Fax: 047-4318249

کیمپ آفس: شبہ استقامت

مکتبہ عربیہ اسلامیہ، دارالکتاب، اسلام آباد

Ph: 021-4640552, 021-4644701

Ph: 021-4640552, 021-4644701

مکتبہ عربیہ اسلامیہ

مرکز کراچی

پتو: ۷۰۰۰۰، کراچی

Ph: 051-5564913

051-5521850

مکتبہ عربیہ اسلامیہ

پتو: ۷۰۰۰۰، کراچی

Ph: 093-7862966

093-7862968

مکتبہ عربیہ اسلامیہ

پتو: ۷۰۰۰۰، کراچی

Ph: 021-4645137

021-4644138

مکتبہ عربیہ اسلامیہ

پتو: ۷۰۰۰۰، کراچی

Ph: 0832-415479

مکتبہ عربیہ اسلامیہ

پتو: ۷۰۰۰۰، کراچی

Ph: 0832-415479

مکتبہ عربیہ اسلامیہ

پتو: ۷۰۰۰۰، کراچی

Ph: 0832-415479

مکتبہ عربیہ اسلامیہ

پتو: ۷۰۰۰۰، کراچی

Ph: 0832-415479

مکتبہ عربیہ اسلامیہ

پتو: ۷۰۰۰۰، کراچی

Ph: 0832-415479


مکتبہ عربیہ اسلامیہ

پتو: ۷۰۰۰۰، کراچی

Ph: 0832-415479

date the Khyber Pakhtunkhwa Service Tribunal is made functional. In the meanwhile, the petitioner may approach the Khyber Pakhtunkhwa Service Tribunal, being the proper forum by filing appeal.

  
JUDGE

  
JUDGE

Announced  
14.11.2018

CERTIFIED TO BE TRUE COPY

PROVIDER  
Peshawar High Court, Peshawar  
Authorized Under Article 8.7 of  
The Qanun-e-Shahadat Order 1984

22 NOV 2018

55

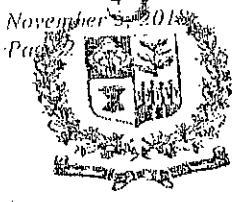
(DB) Hon'ble Mr. Justice Ikramullah Khan  
Hon'ble Justice Musarrat Hilali

Noor Shah, PS

No. 14185  
Date of Presentation of Application 16/11/18  
No of Pages 9/11  
Copying Fee .....  
Urgent Fee .....  
Total 36  
Date of Preparation of Copy 22/11/18  
Date of Delivery of Copy 22/11/18  
Received By [Signature]

28

19



**District Education Officer  
Bajaur at Khar**

Email: [deobajaur@kpk.gov.pk](mailto:deobajaur@kpk.gov.pk)

Voice & Fax: +92942220395

(Annexure/F)

**TRANSFER ORDER**

Mst. Shamim Saeed PST GGPS Sadiq Abad is hereby transferred to GGPS Loi Sum in her own pay and scale in the interest of public service.

Note: -


- (i) No TA / DA allowed.
- (ii) Necessary entries should be made in their service books.

**District Education Officer  
Bajaur**

Endst: No: 1544-97 Dated 05/11 2018

Copy of the above is forwarded to the:

1. Director Education newly merged districts KPK Peshawar.
2. District Accounts Office Bajaur.
3. Accountant of the local office.
4. Official Concerned.

  
**District Education Officer  
Bajaur**

**ATTESTED**

29

DIRECTORATE OF EDUCATION  
 NEWLY MERGED TRIBAL DISTRICTS  
 WARSAK ROAD PESHAWAR, PAKISTAN  
 PHONE. 091-9210166 FAX 091-9210216

No. 11796 /Date Pesh: the 17/9 /2018.  
 E-6/New/Bajaur. (Annexure/D)

To  
 The District Education Officer  
 Bajaur District.

Subject; CANCELLATION OF TRANSFER ORDER.

Memo;  
 I am directed to refer to this office letter No. 11538 dated 7/9/2018 on the above noted subject and to enclose herewith an application in respect of Mst; Shamim Saeed PST; GGPS Sadiq Abad, Bajaur District with the remarks to decide the instant case at your own level in the interest of public service please.

Encl: As Above.

*[Signature]*  
 Deputy Director (Estab)

Dated Pesh: the \_\_\_\_\_ /2018.

Endst: No. \_\_\_\_\_ /-

Copy to:-

PA to Director Education, NMTD.

*[Signature]*  
 Deputy Director (Estab)

*[Handwritten notes]*  
 ARE O/F  
 H/C  
 B  
 17/9/2018  
 For [unclear]

**ATTESTED**



**POWER OF ATTORNEY**

In the Court of 12 Pk Special Tribunal Peshawar  
Shameem Ineed

} For  
} Plaintiff  
} Appellant  
} Petitioner  
} Complainant

**VERSUS**

Govt of Pk and others

} Defendant  
} Respondent  
} Accused  
}

Appeal/Revision/Suit/Application/Petition/Case No. \_\_\_\_\_ of \_\_\_\_\_  
Fixed for \_\_\_\_\_

I/W, the undersigned, do hereby nominate and appoint

**ZARTAJ ANWAR ADVOCATE**, my true and lawful attorney, for me in my same and on my behalf to appear at Pk to appear, plead, act and answer in the above Court or any Court to which the business is transferred in the above matter and is agreed to sign and file petitions. An appeal, statements, accounts, exhibits. Compromise or other documents whatsoever, in connection with the said matter or any matter arising there from and also to apply for and receive all documents or copies of documents, depositions etc, and to apply for and issue summons and other writs or sub-poena and to apply for and get issued and arrest, attachment or other executions, warrants or order and to conduct any proceeding that may arise there out; and to apply for and receive payment of any or all sums or submit for the above matter to arbitration, and to employ any other Legal Practitioner authorizing him to exercise the power and authorizes hereby conferred on the Advocate wherever he may think fit to do so, any other lawyer may be appointed by my said counsel to conduct the case who shall have the same powers.

**AND** to all acts legally necessary to manage and conduct the said case in all respects, whether herein specified or not, as may be proper and expedient.

**AND** I/we hereby agree to ratify and confirm all lawful acts done on my/our behalf under or by virtue of this power or of the usual practice in such matter.

**PROVIDED** always, that I/we undertake at time of calling of the case by the Court/my authorized agent shall inform the Advocate and make him appear in Court, if the case may be dismissed in default, if it be proceeded ex-parte the said counsel shall not be held responsible for the same. All costs awarded in favour shall be the right of the counsel or his nominee, and if awarded against shall be payable by me/us

**IN WITNESS** whereof I/we have hereto signed at Pk  
the \_\_\_\_\_ day to \_\_\_\_\_ the year \_\_\_\_\_  
Executant/Executants S.S  
Accepted subject to the terms regarding fee \_\_\_\_\_



**Zartaj Anwar**

Advocate High Courts

ADVOCATES, LEGAL ADVISORS, SERVICE & LABOUR LAW CONSULTANT  
FR-3-4, Fourth Floor, Bilour Plaza, Saddar Road, Peshawar Cantt  
Ph.091-5272154 Mobile-0331-9399185

BC-10-9851

CNIC:17301-1610454-5

*original*

**BEFORE THE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL PESHAWAR.**

**Appeal NO. 103/2019**

**Shameem Saeed PST GGPS Sdiq Abad Patak.....Appellant.**

**Versus**

**Government of Pakhtunkhwa through Secretary, ES&E Peshawar & Others.....Respondents.**

**Comments on behalf of Respondent No. 2.**

**Preliminary objections.**

- That the appellant has got no cause of action, locus standi to file the instant appeal.
- That the appellant has not come to this Court with clean hands.
- That the appellant is badly time barred.
- That the appellant has concealed material facts from the Honorable court.
- That the appellant is not maintainable in the present form.
- That the conduct of appellant estopped himself to bring the instant appeal.

**ON FACTS.**

1. No comments Pertains to record.
2. **Incorrect:** The appellant was transferred to GGPS Chamarkand on 02/08/2018 but not resume her charge their and was absent from her duty.
3. **Incorrect:** The appellant was habitually disobedience, willfulness and blunt negligence towards her duties in the school in this regard an explanation was called by the Ex-DEO Bajaur Endst:74-77 dated 7/8/2017.(copy attached as Annexure A)and then a show cause notice was issued by the competent authority vide No 11460 dated 15/8/2017.(copy attached as Annexure B)in which was directed to show cause of her willful absences and explain her position within 7 days but the appellant was not been proved her willful and unauthorized absence and at the last an enquiry was conducted by the competent authority to dig out her position(copy Attached as Annexure C)in which shows her duty position.
4. **Incorrect:** The appellant was wrongly transferred by the Ex-DEO therefore the said order was cancelled/withdrawn in the interest of public.
5. **Incorrect:** On the ground on which the EX DEO his transferred Mst Dilbar Begum as punishment for not attaining the said training, she has not been nominated for the said training as per record of director NMD

- indicated by the enquiry officer in his inquiry. (copy Attached as Annexure D).
6. **Incorrect:** GCT Inayat Killi and GGPS Loi Sam both stations in the same Tehsil and according to the Policy.
  7. **Incorrect:** The competent authority EX DEO has retained the transfer order issued vide No 444-48 which was illegally ordered as mentioned in para 6 above.
  8. **Incorrect:** in fact the blue eyed one is Shameem Saeed as she has been transferred and adjusted three times within a short period of two months by the EX DEO.
  9. **Incorrect:** The private respondent is local and she is punctual teacher performing her duties with great zeal and zest at GGPS Sadiq abad, as per rule local teachers may be posted near to their home station.
  10. **Incorrect:** The case was crucial and has created administrative problems which were affecting the studies of the innocent students and adjustment of two PSHTs in the same school was against the rules and policy.
  11. **Incorrect:** the appellate authority DE NMD has ordered an inquiry in the instant case see **annexure D**.
  12. **Incorrect:** the appellant has approached to the Peshawar high court instead of proper forum which is the honorable Service Tribunal.
  13. **Incorrect:** the appeal of the appellant is baseless. She is approaching the high-ups frequently, disturbing and blackmailing the whole department. If her service record is checked, she has not performed her duty accordingly, while two inquiries have been conducted against her by the respondent department in one of them she has been penalized.

**Grounds:**

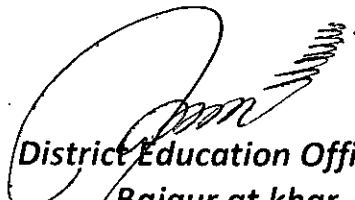
- A. **Incorrect.** The appellant has been treated by the competent authority in accordance with law and rules as no one is allowed to violate the government rules/regulations.
- B. **Incorrect.** The notification of transfer is according to the law and rules.
- C. **Incorrect:** the said order is according law and rules/policy and they both are in the same tehsil at nearest stations.
- D. **Incorrect:** the competent authority can transfer and post an employ on need base and in the interest of public as the appellant has been transferred posted three times within a short period of two months.
- E. **Incorrect:** both the husband and wife are performing their duties in one and in the same tehsil and near to their home.
- F. **Incorrect:** As explained in para E above, it is pertinent to mention here that wedlock policy does not allow to dislocate a local and punctual employ from her post.
- G. **In correct:** as stated above in para D.
- H. **Incorrect:** the appellant was posted illegal and against the policy being two PSHTs in on school by the Ex DEO.

- I. **Incorrect:** In correct: as stated above in para D.
- J. **Incorrect:** the transfer order is according to the law and rules and the competent authority is bound to facilitate and provide teacher to the innocent students as per Article 25 A of the constitution compulsory education is the basic right of the Pakistani citizen. Education authority cannot use his power for his like and dislike it should be in the public interest.
- K. **Incorrect:** as stated in para **13** above.
- L. **Incorrect:** as stated in para **J** above.
- M. **Incorrect:** as stated in para **13** above.
- N. **Incorrect:** the said order is according law and rules/policy.
- O. **Incorrect:** as stated in para **J** above.
- P. The Respondents are also seeks permissions in advance other grounds and proofs at the time of arguments.

**Pray:**

In light of the above stated facts it is requested that the case of the appellant may be order as dismissed and obliged.

**Respondent No.3**

  
**District Education Officer**  
**Bajaur at khar**

**Affidavit:**

I do hereby solemnly affirm and declare on oath, that the contents of he accompanied reply are true and correct to the best of my knowledge and belief and nothing has been concealed from this honourable tribunal.

  
**DEPONENT**



A

**OFFICE OF THE AGENCY EDUCATION OFFICER BAJAUR AGENCY AT KHAF**

No. \_\_\_\_\_ Dated \_\_\_\_\_  
Phone 220304 Fax 220305 Email: AEO@BAJAUR.EDU.PK

To

Shamim Saeed PST GGPS Sar Azghai  
Tabasum Sherin PST GGPS Sar Azghai

Subject

EXPLANATION

Memo

As per visit of the undersigned on dated 5/8/2017 and subsequent visit of the AAEO Kh on dated 12/8/2017, you were found absent from your duties in the school since long which is a matter of grave concern and anxiety and shows your disobedience, willfulness and negligence towards your duty in the school.

So, you are hereby sternly directed to explain your position in the regard with justifiable and tenable arguments within 07 days positively otherwise action as per F & D No. 2017 will be taken against you which can lead to serious consequences in future.

Agency Education Officer  
Bajaur Agency

Enclst No 76-77 Dated 07-08-2017

Copy of the above is forwarded to the

1. Director Education FATA Peshawar

2. Political Agent Bajaur Agency

3. AAEO concerned

4. Accounts Officer to ensure the pay of the officer concerned and make a deduction of 1 month salary.

A. M. B.  
Agency Education Officer  
Bajaur Agency

(B)



OFFICE OF THE AGENCY EDUCATION  
OFFICER BAJAUR AGENCY AT KHAR  
No. 11460 Dated 15/8/2017  
Phone: 220395 Fax: 220395 Email: AEOBajaur@gmail.com

To

Shamim Saeed PST  
Tabasum Sherin PST  
GGPS Sar Azghai Bajaur

Subject: - SHOWCAUSE NOTICE

Memo:-

As you have been absent from your duties in the school without information / permission since long which is a matter of grave concern and anxiety and shows your blunt attitude towards good orders of this office.

So you are hereby sternly directed to show cause of your willfulness absence with justifiable and tenable arguments within 07 days in your defense positively, otherwise in case of non-compliance action will be taken against you under the prevailing E & D rules 2011 which can lead to your removal from service

Agency Education Officer  
Bajaur Agency

Endst No. \_\_\_\_\_ Dated \_\_\_\_\_

Copy of the above is forwarded to the:

- 1 Director Education FATA Peshawar
- 2 Political Agent Bajaur Agency
- 3 AAEO concerned.
- 4 Accountant of the local office to stop the pay of the officials as mentioned above till further order

Agency Education Officer  
Bajaur Agency



To

The Agency Education officer  
Bajaur Agency

2  
②

Subject: INQUIRY REPORT REGARDING MST SHAMIM SAEED PST GGPS SAR AZGHAI

R/sir.

Reference your office letter No 1825-28, dated 21/8/2017 on the subject cited above and to state that an impartial inquiry has been conducted at your office on 23/8/2017.

HISTORY OF THE CASE

Mst. Shamim Saeed PST was charged for wilful absenteeism and non-serious duty behavior due to which the school remained closed and students faced an irreparable loss. She has been transferred to GGPS Sar Azghai from GGPS Spina Dehrai on 13/12/2016 but she could not ensure her duty there and remained absent.

FACTS AND FINDINGS

The committee members questioned / inquired Mst. Shamim Saeed PST and a questionnaire was served upon her but no satisfactory answer was received from her end. However, due to her apologizing behavior and promising attitude during the course of inquiry again and again and her surety to remain punctual and careful in future the committee turned lenient and recommend minor penalty as under please.

1. Recovery of 02 months' salary may be made.
2. One annual increment may be subtracted / denied.
3. Strict monitoring and vigilant supervision should be ensured.

**Committee Members:**

1. Abdul Bar Principal GHS loisum \_\_\_\_\_
2. Saeedur Rahman H/M GHS No: 2 Khar. \_\_\_\_\_
3. Mst. Jamila Azam H/M GGMS C/C Khar. \_\_\_\_\_
4. Mst. Lubna Shaheen AAEO Female. \_\_\_\_\_

AILL B  
19/9/2017

conceded committee

## Enquiry Report

Subject: Enquiry Report in respect of Mst. Dilbar Begum PSHT District Bajaur.

### 1. Reference:

Kindly refer to your office letter No. 12160 dated 28/9/2018 regarding subject cited above. The undersigned visited DEO Office Bajaur on 05-11-2018 at **Annex-I**.

### 2. Introduction:

The DEO Bajaur has transferred Mst. Dilbar Begum, PSHT (BS-15) GGPS Sadiqabad on 02-08-2018 and posted Mst. Shamim Saeed, PSHT (BS-15) at GGPS Sadiqabad in the same order. DE (MD) has issued orders for cancellation on 7-9-2018 and subsequently on 17-9-2018 to DEO for resolving this issue at his own end.

### 3. Proceedings:

- I. Promotion and adjustment notification of PST female teachers to PSHT (BS-15) were collected from the concerned section.
- II. The transfer / posting orders in respect of both the teachers were collected from the concerned section.
- III. Enquiry report was collected from DEO Office Bajaur, which has been conducted at District Level by enquiry committee already ordered by Ex-DEO at **Annex-II**.
- IV. Record from DE (MD) was also collected regarding ECE Training at **Annex-III**. The Ex-DEO has submitted report on 7-9-2018 to DC Bajaur where it has been stated that Mst. Dilbar Begum, PSHT GGPS Sadiqabad has not obeyed his orders regarding participation in the mentioned training, while in the DE (MD) list, she has not been nominated for the said training.

### 4. Facts Findings:


- I. Mst. Shamim Saeed has been promoted recently to the post of PSHT (BS-15) and has been adjusted at GGPS Khairabd Tehsil Khar on 22/6/2018 vide notifications Annexed at **A & B**.
- II. Mst. Shamim Saeed PSHT has been transferred to GGPS Chamarkand Tehsil Chamarkand on 02/08/2018 after 01 Month and 10 days at **Annex-IV**.
- III. Mst. Shamim Saeed PSHT has been transferred to GGPS Sadiqabad on 17/08/2018 after 15 days **Annex-V**.
- IV. On 7-9-2018 DE (FATA) has directed DEO Bajaur for cancellation of Mst. Shamim Saeed transfer order **Annex-VI**.
- V. After 10 days on 17-9-2018 DE (FATA) has directed DEO Bajaur for resolving the issue at his end at **Annex-VII**.
- VI. Mst. Dilbar Begum PSHT (BS-15) has been transferred by the DEO concerned just for the adjustment of Mst. Shamim Saeed, who is habitual of absenteeism.



- VII. Mst. Shamim Saeed has been issued explanation by DEO Bajaur dated 07-08-2017 due to her long absenteeism at **Annex-VIII**.
- VIII. Due to no reply to explanation, she has been issued show cause by DEO Bajaur on 15-8-2017 at **Annex-IX**.
- IX. On account of prolong absenteeism the services of Mst. Shamim Saeed has been suspended by the Ex- DEO Bajaur on 21-8-2017 at **Annex-X**.
- X. Subsequent to the above an enquiry has been conducted against Mst. Shamim Saeed vide No.11625 -28 dated. 21-8-2017 .The Enquiry Committee recommended the following actions against her which are re-produced as under at **Annex-II**:
- Recovery of 02 months salary may be made.
  - One annual increment may be subtracted / denied.
  - Strict monitoring and vigilant supervision should be ensured.
- XI. On 27-9-2017 DE (MD) has directed DEO Bajaur for operationalization of closed school GGPS Sarazghai, Tehsil Salarzai, where Mst. Shamim Saeed, PST was posted at that time at **Annex-XI**.
- XII. It is very astonishing that the Ex-DEO has favored a teacher who is habitual of absenteeism already penalized on account of absentees and frequently approaching to high ups for her illegal posting / transfers which is obviously counts in misconduct.

**5. Recommendations:**

- The transfer order of Mst. Dilbar Begum, PSHT (BS-15), GGPS Sadiqabad may be withdrawn / cancelled, which is against the rules and illegal. Mst. Dilbar Begum, PSHT(BS-15) may be retained in GGPS Sadiqabad in the interest of Public Service as she is performing her duties with great zeal and zest.
- DEO Bajaur may be asked to check the record that the recommendation of the enquiry committee has been implemented or otherwise. Furthermore, stations / schools where the teacher (Mst. Shamim Saeed) has been transferred / posted by Ex-DEO Bajaur may also be visited to check her attendance, taking over charge etc.
- Mst. Shamim Saeed, who has already been penalized on account of her willful absenteeism, still she is frequently approaching the influential and high ups for her illegal transfer and blackmailing the whole education department. She may be warned to careful in future.
- All the DEOs in Merged Districts may be directed to follow the transfer Policy / Rules strictly that they may not disturb the punctual and hardworking teachers for their personal interests. The like and dislike attitude of DEOs has created a lot of Judicial and Administrative issues in Education Department.

  
Abdul Manan,  
Section Officer (Edu)  
Enquiry Officer

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

Service Appeal No. 193 -P/2019

Mst. Shamim Saeed

**VERSUS**

Govt of KPK & others

**APPLICATION FOR ADJOURNMENT**

**Respectfully Sheweth:**


- 1) That the above title appeal/case is pending before this Hon'ble Court/Tribunal which is fixed for hearing today dated 21/05/2019.
- 2) That Counsel for the Respondent No (4) is unable to appear before this Hon'ble Hon'ble Court/Tribunal due to Court proceedings before the Hon'ble Peshawar High Court Peshawar fixed for today.

{Copy of High Court Cause-List annexed Annexure- "A"}

- 3) That due to above stated reason and unavoidable circumstances the undersigned is unable to appear before this Hon'ble Court in connection with the above title case.

It is therefore, most humbly prayed that on acceptance of the Application in hand, the above title case may kindly be adjourned to any other convenient date.

Dated: 21/05/2019

  
Attested  
**ZIA-UD-DIN KHAN**  
Advocate  
High court Federal Sharia  
Court of Pakistan  
Zia-Ud-Din Khan  
Advocate High Court  
(Counsel for Respondent)  
Cell No. 0345-9110368  
0303-5893180

**Office:** INSAF LAW CHAMBER, Flat No. 34-B, Super Market, Phase 1, Hayatabad Township Peshawar City Khyber Pakhtunkhwa Province Islamic Republic of Pakistan.

DAILY LIST FOR TUESDAY, 21 MAY, 2019MR. JUSTICE WAQAR AHMAD SETH, CHIEF JUSTICE &

BEFORE:-

MR. JUSTICE ABDUL SHAKOORCourt No: 1NOTICE CASES11. COC 3-P/2018(in  
WP: 1244/2016)Wajid ali and others  
V/s (Date By Court)Ghulam Nabi, Zia ud Din KhanMr. Qazi Jamil-ur-Rehman and  
othersAG-KPK12. COC 10-P/2019  
with cm. 990/2019  
cm. 991/2019(in  
WP 468-  
P/2015(Against  
order HJ-  
Exjudge, XIII)  
(Green Bench))GM NHA  
V/s  
Arif Baloch

Sikandar Rashid

Sardar Nasir Aslam Khan  
(Abbotabad), Fida Bahadur Kha  
Muhammad Masoom Shah, Wri  
Petition Branch AG Office13. COC 159-  
P/2019(in wp 392-  
P/2019(Against  
order HCJ, X))M/s Bobak Mining Company  
V/s (Date By Court)

Ayesha Malik

Khaista Rehman, Secretary  
Mines & Minerals DevSiraj Ahmad Khan, Writ Petition  
Branch AG Officei COC 160/2019 in wp  
391-P/2019M/s Bobak Mining Company  
V/s

Ayesha Malik

Khaista Rehman, Secretary Mine  
& MineralsSiraj Ahmad Khan, Writ Petition  
Branch AG Officeii COC 161/2019 in wp  
393-P/2016M/s Bobak Mining Company  
V/s

Ayesha Malik

Khaista Rehman, Secretary Mine  
& MineralsSiraj Ahmad Khan, Writ Petition  
Branch AG Officeiii COC 162/2019 in wp  
395-P/2019M/s Bobak Mining Company  
V/s

Ayesha Malik

Khaista Rehman, Secretary Mine  
& MineralsSiraj Ahmad Khan, Writ Petition  
Branch AG Officeiv COC 163/2019 in wp  
394-P/2019M/s Bobak Mining Company  
V/s

Ayesha Malik

Khaista Rehman Secy Mines &  
MineralsSiraj Ahmad Khan, Writ Petition  
Branch AG Office14. CM 12(2) 13-  
P/2019(in wp  
6379-  
P/2018(Order  
HCJ, XIII))Darwaish Muhammad  
V/s (Date By Court)

Tariq Kakar

Muhammad Adil Khan

Siraj Ahmad Khan, Writ Petition  
Branch AG Office

DAILY LIST FOR TUESDAY, 21 MAY, 2019

BEFORE:-

MR. JUSTICE QAISER RASHID KHAN &  
MR. JUSTICE ISHTIAQ IBRAHIMCourt No: 2NOTICE CASES20. W.P 3653-P/2017  
With IR(N)(stay  
granted on 20-9-  
2017),()M/s National RCC Works  
Private Limited  
V/sVice Chancellor Shaheed  
Benazir Bhutto University  
Sheringal Upper Dir etcZia Ud Din Khattak, Saqib Raza, Mian Ahmad  
Hamad, AG KPK, Ahmad Husse21. W.P 5047/2017  
With W.P 5047-  
P/2017()MS A 2 Z E Payments Pvt Ltd  
thr: its Director Fina  
V/s  
Govt of KPK and OthersHamad Malik, Ali Azim Afridi  
AG KPK22. W.P 1922/2018  
With W.P 1922-  
P/2018  
====(General/Adj  
App)====()Shah Fazil  
V/s  
Govt of KPKImtiaz Ali  
Abdul Latif Yousafzai, AG KPK,  
DAG PAK23. W.P 2367-P/2018()Khubab Khan  
V/s (Date By Court)  
Govt of KPKM. Rashid Ali  
AG KPK24. W.P 3625-P/2018()Talamkhel through Haji Jandul  
Khan  
V/s (Date By Court)  
Parwan through Malik Ghulam  
Rasool and OthersFida Gul  
Advocate General25. W.P 4676/2018  
With W.P 4676-  
P/2018()Haji Rehmat Ullah  
V/s  
Assistant Commissioner Bara  
Sub DivisionWali Khan Afridi  
Nasir Mehmood, Shakirullah  
Afridi, AG KPK

DAILY LIST FOR TUESDAY, 21 MAY, 2019MR. JUSTICE IKRAMULLAH KHAN &  
JUSTICE MS. MUSARRAT HILALI

Court No: 5

BEFORE:-

NOTICE CASES

14. W.P 490-P/2017  
(Services)(Against  
termination)
- Riaz Ali Khan and others  
V/s (Date By Court)  
Director General, Peshawar  
Development Authority and  
others
- Syed Haziq Ali Shah  
\_\_\_\_\_  
, Ihsanullah, AG KPK
15. W.P 5040-P/2017(
- Syed Shahid Hussain Shah  
V/s (Date By Court)  
Govt of KPK and Others
- Anwar Shah, Naqibullah Khan  
Khattak  
\_\_\_\_\_  
A.A.G
16. W.P 6271/2018  
With W.P 6271-  
P/2018()
- Muhammad Ayaz  
V/s  
Government of KPK
- Khalid Mahmood  
\_\_\_\_\_  
Writ Petition Branch AG Office
17. W.P 30-P/2018  
With IR(N)(stay  
granted on 4-1-  
2018),(with IR)
- M/s Wahid Builders & Compan  
Pvt Ltd  
V/s  
The Additional Chief Secretary  
FATA etc  
MS Wahid Builders Pvt Ltd and  
Others  
ACS FATA and Others
- Shumail Ahmad Butt, Zia ud Din  
Khan  
\_\_\_\_\_  
Muhammad Ali Khan, AG KPK  
Noor Alam Khan, Zia ud Din Khan  
\_\_\_\_\_  
Shumail Ahmad Butt, AG KPK,  
Muhammad Ali
18. W.P 1428-P/2018  
With IR(N)(stay  
granted on 11-4-  
2018),with  
coc.461-p/18,with  
cms.2091-  
p/18(M)(stay),  
631-p/19(M)(For())  
I.R (N) with W.P  
2719/2018 (Quashmen  
of FIR)
- Samsons Group of Companies  
Pvt Ltd  
V/s  
KPK Govt of KPK Sports  
Culture and Toursim  
Yaqub Hussain Khan GM Sams  
Group of Insurance  
Provincial Govt of KPK
- Khalid Mahmood  
\_\_\_\_\_  
Farmanullah Khattak, Asghar  
Khan Kundi, AG KPK  
Khalid Mahmood  
\_\_\_\_\_  
Muhammad Asghar Khan, AG  
KPK

DAILY LIST FOR TUESDAY, 21 MAY, 2019MR. JUSTICE MUHAMMAD IBRAHIM KHAN &  
MR. JUSTICE MUHAMMAD AYUB KHAN

Court No: 9

BEFORE:-

NOTICE CASES

29. W.P 2677-P/2019() Shahid Orakzai In Person  
V/s (Date By Court) \_\_\_\_\_  
Abdul Hafeez Shiekh, Ministry Deputy Attorney General  
of Finance
30. Cr.A 730-P/2015() State through Regional Directo Asghar Khan Kundi  
ANF  
V/s Special Prosecutor ANF  
Nasrumminallah and another
31. FAB/18 (SME Bank Limited) Moinuddin Humayun, Barrister  
P/2015(Rs:8,560,6 V/s Babar Shahzad Imran  
88/-) M/S Peshawar Breads Pvt Ltd \_\_\_\_\_  
and others Nasir Ahmed Khan, Zia ud Din  
Khan, Ikram Ullah Khan

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

Service Appeal No. 193 -P/2018

Mst. Shamim Saeed

**VERSUS**

Govt of KPK & others



**APPLICATION FOR ADJOURNMENT**

*Put up to the court with  
relevant appmt.*

**Respectfully Sheweth:**

*Shamim Saeed  
27/6/19.*

*Reader.*

- 1) That the above title Service Appeal is pending adjudication before this Hon'ble Court/Tribunal which is fixed for hearing dated **28/06/2019**.
- 2) That beloved father of Counsel of the Petitioner is ailing from the epidemic disease of Par-Cancer for the last four/five years.
- 3) That Counsel for the Petitioner is unable to appear before this Hon'ble Court/Tribunal due to Medical Checkup of his beloved father at the **Al-Shifa Hospital, Rawalpindi**.
- 4) That for the above stated reason and unavoidable circumstances the undersigned is unable to appear before this Hon'ble Court/Tribunal in connection with the above titled case.

It is therefore, most humbly prayed that on acceptance of the **Application** in hand, the above titled case may kindly be adjourned to any other convenient date.

**Dated: 27/06/2019**

*Zia-Ud-Din Khan*  
Attested  
**ZIA-UD-DIN KHAN**  
Advocate  
High court Federal Sharia  
Court of Pakistan  
**Zia-Ud-Din Khan**  
Advocate High Court  
(Counsel for Respondent. No. 4)  
Cell No. 0345-9110368  
0303-5893180

**Office: INSAF LAW CHAMBER**, Flat No. 34-B, Super Market Phase-1, Hayatabad Township Peshawar City, Khyber Pakhtunkhwa Province, the Islamic Republic of Pakistan.

①

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

Reply

In

Service Appeal No. \_\_\_\_\_-P/2019

Mst. Shamim Saeed

**VERSUS**

Govt of KPK & others

**INDEX**

S. No	Description of Documents	Annexure	Pages
1	Comments/Reply		2 - 4
2	Copies of Medical Reports & Applications	'A'	5 - 17
3	Copy of Transfer Order dated 02/02/2018	'B'	18

Dated: 30/07/2019

Respondent No (4)  
Through  
Zia-Ud-Din Khan  
Advocate High Court Federal Sharia  
Court of Pakistan  
Cell No: 03459110368  
03035893180

*Attested*  
**ZIA-UD-DIN KHAN**  
Advocate

**Office: INSAF LAW CHAMBER**, Flat No. 34-B, Super Market Phase-1, Hayatabad Township  
Peshawar City Khyber Pakhtunkhwa Province the Islamic Republic of Pakistan.



(2)

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

Reply

In

Service Appeal No. \_\_\_\_\_ -P/2019

Mst. Shamim Saeed

**VERSUS**

Govt of KPK & others

**COMMENTS/REPLY ON BEHALF OF RESPONDENT**

**NO. 4 (MST. DILBAR BEGUM)**

**Respectfully Sheweth:**

**PRELIMINARY OBJECTIONS**

- i) That the appellant has got no cause of action to file the appeal in hand before this Hon'ble Court/Tribunal.
- ii) That the appellant has got no Locus Standi before this Hon'ble Court/Tribunal to file the instant appeal.
- iii) That the appellant has not come to this Hon'ble Court with clean hands and she differs her words and conduct.
- iv) That the appellant had concealed material facts from this Hon'ble Court/Tribunal.
- v) That the appeal in hand is not maintainable in its present form.
- vi) That the appellant estopped by her own conduct to file the appeal in hand before this Hon'ble Court/Tribunal.

**ON FACTS**

- 1) Contention of the appellant in **Para 1 - 4** needs no comments.
- 2) Contention of the appellant in **Para 5** of appeal is correct to the extent that the **Deputy Director (Establishment)** issued a Letter to **Respondent No (3)/the District Education Officer Bajawar** for cancellation of transfer order of the present respondent. While, the remaining Para is absolutely incorrect and the appellant is trying to misconceive this Hon'ble Court/Tribunal. It is important to mention here that the respondent was nominated for a 'Training Session' at "**Elementary Training Institute Jamrud**", but unfortunately the respondent wasn't capable to attend and participate in the said training due to her **Blood disease**. Accordingly, the Respondent No

3

(4) under seriousness of her ailment submit applications before the District Education Officer & Assistant District Education Officer Bajawar for cancellation of the above mentioned training session keeping in view her illness. Likewise, the present respondent also submitted her application/appeal before the Director Education (FATA) for further redresses of her grievances.

{Copies of Medical Reports & Applications annexed Annexure-  
{"A"}

3) Contention of the appellant in Para 6 - 13 needs no comments.

### ON GROUNDS

A) Contention of the appellant in Para A - J needs no comments.

K) The contention of the appellant in Para K is incorrect, hence denied. It is important to mention here that the appellant was posted at the Government Girls Primary School Khair-Abad and from there she (the appellant) was transferred to the Government Girls Primary School Chamarkand in her own pay scale dated 02/08/2018. While, according to the same Transfer Order/Notification the present respondent was transferred from Government Girls Primary School Sadiq-Abad to Government Girls Primary School Loi-Sum. But the appellant refused to resume charge at the Government Girls Primary School Chamarkand and reluctant to perform her duties at Chamarkand, from where she remain absent. Hence, the present appellant concealed material facts from this Hon'ble Court/Tribunal.

{Copy of Transfer Order dated 02/02/2018 annexed  
Annexure-{"B"}

L - P) Contention of the appellant in Para L - P needs no comments.

### PRAYER

It is therefore, most humbly prayed;

- i) That the posting and transfer order of the appellant shall be reversed to her previous duty station at 'GGPS Chamarkand' as the same affecting the fundamental rights of the present Respondent No (4).
- ii) The present Appeal is devoid of merit, hence the same shall be dismissed.

iii) Any other remedy deems proper in matter shall also be granted in favor of the Respondent No (4).

9

Dated: 30/07/2019

Respondent No (4)  
Through  
Zia-Ud-Din Khan  
Advocate High Court  
**ZIA-UD-DIN KHAN**  
Advocate  
High court Federal Sharia  
Court of Pakistan

Certificate

As per instructions of my Client, the contents of the above Comments/Reply are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court/Tribunal.

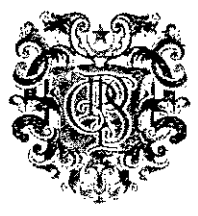
Advocate

Annex - A<sup>m</sup> (5-17)

5

Specialist

Ali Mohammad Khan  
MBBS, FCPS, FICS



gratis

سر جیکل اسپیشلسٹ

ڈاکٹر علی محمد خان

ایم بی بی ایس، ایف سی پی ایس، ایف آئی سی ایس

Distt: Surgical Specialist

Laparoscopic & General Surgeon

وہو Hal Bueha

Bp 140/70

Pains & aches

Nse.

49 30 ♂  
29 ♀

Adv

Rx

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10 - 1/2

Carb - 1 P

fas Concor 2.5

Carb - 1

This chit is not valid for Medico-legal Purposes

کلینک: ایجنسی ہیڈ کوارٹرز ہسپتال خار باجوڑ

رابطہ نمبر: Mob: 0315-3344844

OPP: AHQ HOSPITAL KHAR BAJAUR AGENCY: CONTACT: 0942-221880-0306-8787880-0342-2333

Email: chieflabajaur@gmail.com - Biotechbajawar@yahoo.com

6



# Chief

Medical Laboratory & ECG Center  
Bajaur

Patient Name W/O LAL BACHA  
Father/Husband Name  
NIC No  
Age/Sex FEMALE  
Specimen Blood/Urine  
Consultant DR. ALI MOHD SB

Reg. Date 3/6/2018  
Reg. Local Chief Lab  
Destination Chief Lab  
Address BAJAUR  
Ph No  
Lab# 3936

TEST	RESULT	NORMAL VALUE	Unit
Hb%	9.2 g/dl	12-----16	g/dl
HBs Ag	Negative		
Anti HCV Ab	Negative		
Urine Pregnancy Test	Negative		

زنگ  
نور  
و شکر  
مرد  
زرد  
کالی  
ککاب  
+  
8 p  
مرد  
ککاب

Mumtaz  
Dental Surgeon

Name: Mr. Lal Bacha Date: 24.6.18

Kate

045-83

(-)

① Cu  $\frac{1}{2}$  - Ext.

②  $P_2$  Augment

③  $P_2$  Nuclear Fork

با نکت

میزد گز

با و سا آن

روزانہ صبح ناشتے کے بعد اور شام کھانے کے بعد دیش کیا کریں۔ آپ کے دانت بہت ساری بیماریوں سے محفوظ رہیں۔

CLINIC: JANDOOOL MEDICAL CENTRE MUNDA DISTT: DIR (L)  
PH: 0945-830807

دو نم درفو اسٹیج

کری سکل

اکثر تبادلہ

ت مہادر مفاہد

Date 30/8/18

بم گور غنیہ گز

ہ مہادر قز آباد



Gandool Medical Complex & Maternity

Home Samarbagh Road Munda ph. 0945-830807

Name e/o Lal Bakhsh Gender F No 7

Doctor: Mumtaz SB Test: Anti HCV HBs Ag Date: 24/6/2018

Test	Result
HBS Ag	Non - Reactive
Anti HCV	Non - Reactive
Blood Sugar (R)	

Signature 

کلینک: مدینہ میڈیکل سنٹر بمقابلہ ایجنسی ہیڈ کوارٹر ہسپتال خار باجوڑ

Dr. Abdul Hameed  
M.B.B.S  
F.C.P.S



ڈاکٹر عبدالحمید

ایم بی بی ایس  
ایف سی پی ایس

Cell: 0335-5273797

Medical Specialist

میڈیکل سپیشلسٹ

Name سیدہ بی بی Age 38M Sex F Date 11/5/18

Clinical Record

Rx

Body aches  
Fever 38.1 (1M)  
Buccal  
epi Epigastri

Cap. Neuron  
MRI - 10/10/18  
Cap. femoral  
MRI - 10  
Gus ketress  
2.13.18 B

IB Sup Ar  
BP 100/80

Abd. Tend  
Epigastri  
Liver (+)

Tab. Robin  
2x10 - 10/10/18





# UNITED

## MEDICAL LABORATORY

Cell: 0308-58  
0306-97

### Lab. Report

Patient Name : W/O Lal Badsha Date : 11/5/2018 11:28 AM  
Sex : Female Referred By : Dr Abdul Hameed  
Medical Specialist  
Age : 38Years Lab No : ####  
Test Required : CP Specimen : Blood,

### Clinical Hematology:

Test	Result	Units	Normal Value
TLC (Total Leucocytes Counts)	9100	Cmm	4,000-----11,000
Hemoglobin	9.7	g/dl	M::14 - 18 F: 12-16
RBC	4.4	Million/cmm	4.4 ----- 5.5
HCT	32	%	36-----48
MCV	73	fl	76-----96
MCH	21	pg	32 ----- 36
MCHC	30	g/dl	30-----35
RDWc	18	%	
Platelets Counts	335,000	/cmm	1,50,000 - 4,50,000
DLC (Differential Leucocytes Count)			
Neutrophils	68	%	40 ----- 70
Lymphocytes	25	%	20 ----- 40
Eosinophils	01	%	02 ----- 05
Monocytes	06	%	02 ----- 08

IC Lab

Quality Lab Services for All Diagnostic Tests

Haematology, Chemical Pathology, Hormones, & Tumor Markes, Genotyping

ایجنسی ہیڈ وارڈر ہسپتال خار باجوڑ ایجنسی

Aimad Press Khar 0301-



# UNITED

## MEDICAL LABORATORY

Cell: 0308-5801982  
0306-9704656

### Lab. Report

Patient Name : W/O Lal Badsha Date : 11/5/2018 11:38 AM  
Sex : Female Referred By : Dr Abdul Hameed  
Medical Specialist  
Age : 38Yrs Lab No : #####  
Test Required : Brucella/RBS/HCV/H.Pylori Specimen : Blood  
ALT

### SPECIAL REPORT

Brucella	1/20	1/40	1/80	1/160	1/320
Abortus	(+)	(+)	(-)	(-)	(-)
Militensis	(+)	(+)	(-)	(-)	(-)

Brucella Test Negative

Blood Sugar 88 mg/dl  
HbAg Negative  
Anti HCV Negative  
H.pylori Negative  
ALT 65U/l

IC Lab

Quality Lab Services for All Diagnostic Tests

Haematology, Chemical Pathology, Hormones, & Tumor Markes, Genotyping

ایجنسی ہیدوارٹر ہسپتال خار باجوڑ ایجنسی

Aimad Press Khar 0301-2816355

**KARTAJ**  
M.B.B.S, D.M.R.D

Ultrasound Specialist  
**RADIOLOGIST**  
D.H.Q. Hospital Timergara

پیشاب کا ٹیسٹ الٹراسائونڈ کے  
بعد کریں۔ مریض کو پانی پلائیں۔

**ڈاکٹر سرتاج**

ایم بی بی ایس، ڈی ایم آر ڈی  
الٹراساؤنڈ سپیشلسٹ  
ریڈیالوجسٹ  
ڈسٹرکٹ ہیڈ کوارٹر ہسپتال تیگرہ  
کلینک: الشفاء ہسپتال  
موبائل: 0344-9760420

Name w/o Lal Bacha Referred by BAJAJ

**Abd: U/S**

- ◆ Liver, G. Bladder and Biliary channels are normal.
- ◆ Spleen, Pancreas normal.
- ◆ Right kidney normal. No calculous or Hyrdonephrosis seen.
- ◆ Left kidney normal. No calculous or Hydronephrosis seen.
- ◆ Bladder full and normal.

Normal size A/Y UTERUS  
NO pelvic mass or cyst  
seen.

22-6-18

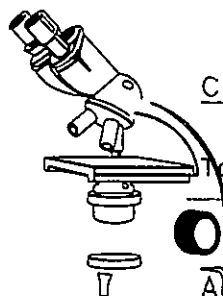
13

**MASHAL**  
Clinical Laboratory



Near: A.H.Q Hospital  
Khar Bajaur

Patient Name : W/O Lal Badshah Date : 29/06/20018  
 Sex : Female Referred By : Dr Abdul Hamid Sb  
 Test Required : As Advise Specimen : Serum



Chemical Pathology:

Test	Result	Normal Value
ALT(SGPT) (Alanin Amino Transafarase)	65 U/L	10 ---- 45 U/L
HE%	8.9	12-----14 g/dl
RBS	88	80-----140 mg/dl
HBs Ag	Negative.	
Anti HCV	Negative.	
H,Pylori	Negative.	

Brucella	1/20	1/40	1/80	1/160	1/320
Aborts	(+)	(-)	(-)	(-)	(-)
Militancy	(+)	(-)	(-)	(-)	(-)

Brucella Test Negative

LABORATORY REPORT

In charge lab

*Not Valid For Court*

Saeed Ur Rahman // Abdul Salam  
 0303-9062190 // 0308-5792443

انجمنی ہیڈ کوارٹر ہسپتال خار باجور  
 Email: saeedmuskan713@gmail.com

نیو مشال کلینکل لیبارٹری

Dr. Abdul Hameed

M.B.B.S

F.C.P.S

Cell: 0335-5273797

ڈاکٹر عبدالحمید

ایم بی بی ایس

ایف سی پی ایس

میڈیکل سپیشلسٹ

Medical Specialist

Name

محمد سعید

Age

40

Sex

F

Date

29/6/18

Clinical Record

Rx

An iron deficiency  
Anemia

Needs workup  
of GI -

AK: Hemolysis

3 Episodes

RAI 12/2/80

Pallor (+)

Pass wlu

On Plavix

On RISCIC

W/Stat

On metformin

US - Ht

On transaminase TDS

Adv 0.5ml/kg

Dr. Abdul Hameed  
MBBS FCP  
Medical Specialist

خدمت جناب ڈائریکٹر صحت کوآرڈینیشن سیکریٹری

Asst. Director

07/9/18

بڑے بلڈ گروپ اور ایس آر ڈی ٹی سے  
ڈیپریٹمنٹ صحت کوآرڈینیشن

کہ میرا گورنمنٹ ٹریڈنگ اسکول ڈیپریٹمنٹ صحت کوآرڈینیشن میں ہے۔  
اور آپ لکھتے ہیں کہ یہ صحت کوآرڈینیشن میں ہے۔

دوسرے نام لکھا ہے۔ اور یہ صحت کوآرڈینیشن میں ہے۔  
بلڈ گروپ کے نام اور وہی نام ہے۔

بلڈ گروپ کے نام اور وہی نام ہے۔

گورنمنٹ کے نام میں ہیں اور صحت کوآرڈینیشن کے نام سے نکالے گئے۔  
AAE.O فیصل نے گورنمنٹ سے یہ نام لکھا ہے۔

AAE.O بورڈ نے یہ نام بنایا کہ تم گورنمنٹ کو نہیں لکھا ہے۔

اور ٹی سم گورنمنٹ سے یہ نام لکھا ہے کہ میں لکھا ہوں۔

میرے ساتھ اتفاق کیا جائے بلکہ اتفاق نہ ہو تو

ٹیکسٹ کے ساتھ سکول کو A.E.O. باجوڑ آیا اور ابراہیم کے ساتھ

لکھا ہے کہ یہ نام لکھا ہے۔

انعامیہ رقم دے دیں۔  
برائے نام صحت کوآرڈینیشن

گورنمنٹ ہائیڈرو گریڈنگ ایجنسی کے لیے ٹرانسفر کیا گیا ہے

برائے ٹرانسفر آرڈر، شمیم GGP5  
میں سے زیادہ اور دیگر ٹیم کے دیگر

DD(E): As per DDO (C), the applicant has positively been transferred, as she refused to attend a compulsory training at Jamsh. without any valid reason.

GGP5 نے ایسا ڈیوٹی ٹرانسفر کیا ہے۔  
28/11/18

Keep for Record.

GGP5 سے جرنل سزا پر مبنی آباؤ دیگر کے خلاف ٹرانسفر کرنے میں لاپرواہی اور  
گورنمنٹ ہائیڈرو گریڈنگ ایجنسی کے لیے ٹرانسفر کیا گیا ہے۔

میں نے آپ کو ایجنسی کے لیے ٹرانسفر کیا گیا ہے تاکہ آپ کو ایجنسی

میں آ کر کام کر سکیں اور اس کے لیے شمیم کے آرڈر ٹرانسفر کیا گیا ہے۔

آپ کو ایجنسی کے لیے ٹرانسفر کیا گیا ہے۔

شمیم کو ایجنسی میں آ کر کام کرنے اور آپ کو ایجنسی

میں آ کر کام کرنے کے لیے ضروری ہے۔

اور میں اس کے لیے ضروری ہے۔

لہذا آپ ایجنسی میں آ کر کام کرنے اور آپ کو ایجنسی

میں آ کر کام کرنے کے لیے ضروری ہے۔

اور شمیم کے آرڈر ٹرانسفر کیا گیا ہے۔

As per DD(E) check the transfer order of GGP5 to Hydrographic Agency.

ایسا ٹرانسفر کیا گیا ہے۔

حکومت پاکستان ACS صحت ٹرانسپیرینس فائنانس سیکرٹریٹ  
پرائز ڈیپارٹمنٹ ٹرانسپیرینس

لوی سم سے

Plan get the detail of the issue and account discrepancy the

ٹرانسپیرینس

ڈیپارٹمنٹ ٹرانسپیرینس فائنانس سیکرٹریٹ  
پرائز ڈیپارٹمنٹ ٹرانسپیرینس

104/20

ڈیپارٹمنٹ ٹرانسپیرینس فائنانس سیکرٹریٹ  
پرائز ڈیپارٹمنٹ ٹرانسپیرینس

Dir Edu

ڈیپارٹمنٹ ٹرانسپیرینس فائنانس سیکرٹریٹ  
پرائز ڈیپارٹمنٹ ٹرانسپیرینس

ڈیپارٹمنٹ ٹرانسپیرینس فائنانس سیکرٹریٹ  
پرائز ڈیپارٹمنٹ ٹرانسپیرینس

ڈیپارٹمنٹ ٹرانسپیرینس فائنانس سیکرٹریٹ  
پرائز ڈیپارٹمنٹ ٹرانسپیرینس

ڈیپارٹمنٹ ٹرانسپیرینس فائنانس سیکرٹریٹ  
پرائز ڈیپارٹمنٹ ٹرانسپیرینس

ڈیپارٹمنٹ ٹرانسپیرینس فائنانس سیکرٹریٹ  
پرائز ڈیپارٹمنٹ ٹرانسپیرینس



Annex-13

(18)



OFFICE OF THE AGENCY EDUCATION OFFICER BAJAUR  
AGENCY AT KHAR

TRANSFER ORDER

The following PSHTs/PST Female teachers are hereby transferred to the schools noted against their name on their own pay and scale with effect from their date of taking over charge in the interest of public service.

S.No	Name of teacher	From	To	Remarks
1.	Dilbar Begum.	GGPS Sadiq Abad	GGPS loisum	Vice .S.No.3 ( under report)
2.	Shamim Saeed	GGPS Khair Abad	GGPS Chamarkand	AVP
3.	Amina	GGPS loisum	GGPS Khair Abad	Vice. S.No.2
4.	Nazai	GGPS Sewai	GGPS Bala Chinagai	AVP ( under report)

Note:

Charge report should be submitted in duplicate.  
No TA/DA is allowed.

(Mr. Amrullah)  
AGENCY EDUCATION OFFICER  
BAJAUR AGENCY

Endst 175-77 /Estab; Dated 02/08 /2018

Copy of the above is forwarded to the:-

1. AAEO Female Concerned.
2. Head Clerk of the local office.
3. Official Concerned.

*Amrullah*  
AGENCY EDUCATION OFFICER  
BAJAUR AGENCY

✓

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

No. 2128 /ST

Dated 5 / 12 / 2019

To


The District Education Officer,  
Government of Khyber Pakhtunkhwa,  
Bajaur at Khar.

Subject: -

JUDGMENT IN APPEAL NO. 193/2019, MST. SHAMEEM SAEED.

I am directed to forward herewith a certified copy of Judgement dated 03.10.2019 passed by this Tribunal on the above subject for strict compliance.

Encl: As above

  
REGISTRAR  
KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL  
PESHAWAR.

**OFFICE OF THE AGENCY EDUCATION OFFICER  
AT KHAR BAJAUR AGENCY**

**NOTIFICATION**

In the light of upgradation of posts for grant of incentives of higher pay scale to primary school teachers (PSTs) vide Govt of KPK (E&SE) department Notification No: SO(B&A)/1-18/E&SE/2012, duly endorsed by the Directorate of Education FATA Peshawar No: 8233-60, dated 08-08-2016 and as per minutes issued by departmental Promotion Committee convened on 27/10/2016 at Education office Bajaur under the chairmanship of AEO Bajaur, the following 66 Female primary school teachers (PSTs) BS-12 are hereby upgraded to Primary School Head Teachers (PSHTs) BS -15 w.e.f 01-07-2012 under the following terms and conditions.

Sl. No.	Name of Teacher	Present Post	Proposed Post
1	Hussan Ara	Abdur Rahman	GGPS Bai Khan Shah
2	Tawhid Bibi	Syed Habib Shah	GGPS Maminzao
3	Rahmat Bibi	Behadar Khan	GGPS Damadola Tor Jan Killi
4	Nayela Perveen	Qazi Muhammad	GGPS Khar
5	Nasrin Begum	Razam Khan	GGPS Mano Dera No 1
6	Haroon Nisa	Baghdad Ali	GGPS College Colony
7	Rashki Chaman	Rahmetullah	GGPS Jawdaro
8	Gul Haram	Abdul Hanan	GGPS Kamadara
9	Naseema Begum	Muhammad Zamin	GGPS Jar
10	Bibi Zainab	Muhammad Iqbal	GGPS Qadar Khan Killi
11	Shagufta Naz	Ali Akbar Khan	GGPS Chenagai
12	Zalida Begum	Bacha Ghulam	GGMS Raghagan
13	Nazis Akbar	Jan Akbar	GGPS Zagai niand
14	Noor Jehan	Pomaba Gul	GGPS Pampokha
15	Nilofar Begum	Ashraf Khan	GGPS Tani
16	Naseem Begum	Rageeb Khan	GGPS Colony Nawagai
17	Racsa Gul	Habib Resool	GGPS Bandagai
18	Zahila Bibi	Khan Dad Khan	GGPS Loi Kharkai
19	Shaheda Rahmi	Rahim Shah	GGPS Kassai
20	Nasrat Bibi	Soudagar	GGPS Umarai
21	Mihar Begum	Qadar Muhammad	GGPS Muzamin Khan killi
22	Delber begum	Ghulam Hszrat	GGMS Sadiq Abad
23	Safia Begum	Sher Zaman	GGPS Dag Oillah
24	Surreya Begum	Fazal Hussain	GGPS Mato Chinagai

No	Name of official / Teacher	Name	
X 25	Noor Zia	Ihsanulla	GGPS Pashat
X 26	Malka Bilqees	Nazar Gul	GGPS Kbar
X 27	Hussan Bano	Jan Khan	GGMS Khair Abad
28	Zainab Bibi	Alam Zeb	GGPS Nawa Killi
29	Sarwala	Faqir Muhammad	GGPS Janat Shah
X 30	Basmin Begum	Gul Dad Khan	GGPS Tira Bartrass
31	Zuhra Bibi	Armin Jan. X	GGPS Kotkai Charmang
32	Noorul Anwar	Fazal Aliad	GGPS Kamadara
33	Niaz Begum	Muhammad Darvesh	GGPS Niag No 2
34	Khalida Begum	Ghulam Muhammad X	GGPS palang
35	Miss Shafqat	Noorul Haq	GGPS Ghakhai
X 36	Khalida Haider	Ghulam Haider	GGPS Jar
37	Nasrat Begum	Muhammad Din Khan	GGPS Khona
38	Zuhra Begum	Gul Khan	GGPS Niag No 1
39	Azra Begum	Khaista Mand	GGPS Rahim Abad Arang
40	Yasmeen Begum	Bakht Bacha	GGPS Anwar Abad
41	Hanshida Bibi X	Hazrat Muhammad Syed	GGPS Badan
42	Gul Siraja	Fanizar	GGPS Narai Tangai
43	Khalida X	Muhammad Ashraf	GGPS Bazar Nawagai
X 44	Zuhra Nascem X	Bakht Zada	GGPS Mirwals Arang
45	Nasrin Bibi	Muhammad Rasool	GGPS Agra
46	Farhad Aziz	Aziz ur Rahman	GGPS Balolai
47	Yasmin Gul	Muhammadi Gul	GGPS Bandagai
48	Tawheed Begum	Alam Zeb	GGPS Pashat
49	Kalsoom	Muhammad Sher	GGPS Bazar Nawagai
50	Zahida Bibi	Muhammad Amin	GGPS Sharbatani
51	Shaheen shah	Ghulam Nabi	GGPS Khawaga China
52	Sadarat	Malik Ahmad	GGPS Swal Qilla
53	Muslim Bibi	Abdul Nabi	GGPS Shandai More
54	Shahi Bahan	Amir Hamza	GGPS Dag Qillah
55	Shaheen Begum	Abdur Rahman	GGPS Sangarai
56	Mumtaz Begum	Noor Muhammad	GGPS Tangi Balolai
57	Talal Begum	Ghulam Hazrat	GGPS Palang
58	Shah Bibi	Nadar Khan	GGPS Kamar
59	Rabihat Begum	Abdur Rahman	GGPS Samasni

	Name of official / Teacher	Father Name	Residential place of duty
60	Nasreen Jabeen	Muhammad Hanif	GGPS Nisar Abad
61	Nezakat Begum	Bakht Munir	GGPS Loi baba
62	Tasleem Begum	Afzal Khan	GGPS Guli Bagh Matako
63	Raveeda Begum	Amir jamal	GGPS Shah Nari
64	Amina Bibi	Munta Khan	GGPS Kajora Barang
65	Nobahar	Bakht Zada	GGPS Bado Arang
66	Nasim Akhtar	Mehboob Khan	GGPS Spina Tega

## Terms and conditions.

1. They will be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations issued from time to time by the Govt.
3. Their services can be terminated at any time in case their performance is found unsatisfactory during the probation period, in case of misconduct they will be proceeded under the rules from time to time.
4. Charge reports should be submitted to all concerned after their further adjustment orders.
5. Their later Seniority on lower post will remain intact.
6. No TA/DA is allowed for joining their duty.
7. They will give an undertaking to be recorded in their service books to the effect that if any overpayment made to them in the light of this order will be recovered from them and if they are wrongly promoted they will be reversed.

(Muhammad Aslam Khan)  
AGENCY EDUCATION OFFICER  
BAJAUR AGENCY

Endst No: 6540-45 Dated 02/11/2016

copy to the

1. Director of Education FATA Peshawar.
2. Political Agent Bajaur Agency.
3. Agency Accounts officer Bajaur Agency.
4. AAEO Female Concerned.
5. official Concerned.
6. Accountant of the local office.

*Maukili*  
AGENCY EDUCATION OFFICER  
BAJAUR AGENCY

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

C. M. No. \_\_\_\_\_-P/2019

In

Service Appeal No. \_\_\_\_\_-P/2019

Mst. Shamim Saeed

**VERSUS**

Govt of KPK & others

**INDEX**

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2	Wakalat-Nama		4

Dated: 22/04/2019

Respondent  
Through  
Zia-Ud-Din Khan  
Advocate High Court  
Cell No: 03459110368  
03035893180

Attested  
**ZIA UD-DIN KHAN**  
Advocate  
High Court Federal Sharla  
Court of Pakistan

Office: INSAF LAW CHAMBER, Flat No. 34-B, Super Market Phase-1, Hayatabad Township  
Peshawar, Khyber Pakhtunkhwa Province the Islamic Republic of Pakistan.

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

C. M. No. \_\_\_\_\_-P/2019

In

Service Appeal No. \_\_\_\_\_-P/2019

Mst. Shamim Saeed

**VERSUS**

Govt of KPK & others

**APPLICATION FOR IMPLEADMENT OF MST. DILBAR BEGUM PRIMARY SCHOOL  
TEACHER (BPS-15) GOVERNMENT GIRLS PRIMARY SCHOOL SADIQ-ABAD DISTRICT  
BAJAUR IN THE SUBJECT TITLE APPEAL AS NECESSARY PARTY.**

**Respectfully Sheweth:**

- 1) That the instant Service Appeal is pending adjudication before this Hon'ble Court/Tribunal which is fixed for hearing today dated 22/04/2019.
- 2) That the Appellant file the instant Appeal before this Hon'ble Court/Tribunal against the Respondents for transfer of the appellant from Government Girls Primary School Loi-Sum to Government Girls Primary School Sadiq-Abad District Bajaur.
- 3) It is pertinent to mention here that the appellant has been transferred frequently from one station to other in the last few months. Consequently such like frequent posting and transfer Notification/Order of the appellant, seriously affected the present "Respondent".
- 4) It is further supplemented that the appellant has got the political influence of influential people for her illegal posting/transfer and tried her level best to adjust/transfer herself to a place of her own choice. Resultantly, this act of the appellant not only blackmailing the education department but also gravely hurt the present respondent.
- 5) That the Fundamental Rights of the present Respondent are involved in the instant appeal and in view of the above-mentioned facts, it is imperative to implead Mst. Dilbar Begum as a necessary party in the appeal.

It is therefore, most humbly prayed that on acceptance of the instant application, the above mentioned person may please be impleaded as Respondent No. (4) in the above titled appeal.

Dated: 22/04/2019

Respondent  
Through  
Zia-Ud-Din Khan  
Advocate High Court.  
Attested  
**ZIA-UD-DIN KHAN**  
Advocate  
High court Federal Sharia  
Court of Pakistan

Affidavit

As per instructions of my client the contents of the instant Application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court/Tribunal.

Solemnly Affirm before me

DEPONENT



22.4.2019



قیمت  
50 روپے

6783



ایڈوکیٹ: ضیاء الدین خان

بار کونسل ایسوسی ایشن نمبر: Bc-10-9856

رابطہ نمبر: 0345-9110368 / 0305-5893180

پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: جسٹس عین حسین حمید، محترم جج صاحبان سروس ٹریبیونل پشاور

دعویٰ:	منجانب:
علت نمبر:	شمارہ منشیہ حسین
مورخہ:	بنام
جرم:	حکومت خیبر پختونخواہ وغیرہ
تھانہ:	

**باعت تحریر آگے**

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

آن مقام پشاور کیلئے ضیاء الدین خان ایڈوکیٹ یا ٹیگڈ کو وکیل مقرر

کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق نذریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ 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 وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المقوم: 22 اپریل 2019ء

العنا بد - گواہ شد - العنا بد

مقام پشاور کے لیے منظور ہے۔

Accepted  
Attested  
ZIA-UD-DIN KHAN  
Advocate  
High Court Federal Sharia  
Court of Pakistan  
22/4/2019

نوٹ: اس وکالت نامہ کی فونو کاپی ناقابل قبول ہوگی۔

12  
DM

(Annexure/B)



OFFICE OF THE DISTRICT EDUCATION OFFICER  
BAJAUR AGENCY AT KHAR  
NO \_\_\_\_\_ /P&D/ DATED \_\_\_\_\_ /2018  
Phone & Fax No.0942-220395  
Email :khanzad1236@gmail.com

The Deputy Commissioner  
Bajaur Agency.

Subject: - APPEAL FOR CANCELLATION OF TRANSFER IN RESPECT OF DILBAR BEGUM  
GGPS SADIO ABAD IN BAJAUR AGENCY.

Memo:-

Kindly refer to your dairy No.6876 dated 3/09/2018 and your remarks on the body of the application regarding subject cited above.

In this regard, the head Teacher named Dilbar Begum PSHT GGPS Sadiq Abad had been proposed / nominated by Directorate of Education FATA vide his office letter No. 14572-74 dated 21 /6/2018 for Early Children Education Training ( ECE) w.e.f 2-7-2018 to 16-06-2018 (15 days) at GCET Jamrud and pursuance of DE FATA she was recommended vide this office letter No.27-5-218 dated 27/6/2018 ( Copies attached). More over all the nominated/selected teachers were directed to attend the meeting at the office of the undersigned one day before for ensurance of training. She has received the nomination letter and also attended the Meeting but she did not participate /join the important training insisently as scheduled and did not obey the orders. In view of the above facts she was transferred under reportedly to GGPS Loisam . So report is submitted for your kind perusal as desired please.

District Education Officer  
Bajaur Agency

Dist No. 623-24 Dated 7-9-2018

Copy of the above is forwarded to the :-

- ✓ Director of Education NMD /FATA for information
- ADEO /AAEO ( Female) ..

Amir  
District Education Officer  
Bajaur Agency

**School-wise District Cadre & PST Vacant Posts for recruitment in District Bajaur [ FEMALE ]**

School Code/ EMIS ID	Name of College/School	Level	Tehsil/ village	GT (BPS-15)	PET (BPS-15)	DM (BPS-15)	AT (BPS-15)	Qari (BPS-12)	TT (BPS-15)	PST (BPS- 12)	Lab Assistant BPS-07	IT Lab Incharge BPS-07	Total
10005	GGHS Inayat Killi	High	Khar					1			1	0	2
10029	GGPS Badan	Primary	Mamund							1			1
10031	GGPs Damadoal No.1	Primary	Mamund						1				1
10036	GGPS Loi Kharkai	Primary	Mamund							1			1
10041	GGPS Shgo	Primary	Mamund							1			1
10060	GGPS Manogai	Primary	Nawagai							2			2
10065	GGPS Malkana Hilal Khail	Primary	Nawagai							1			1
10073	GGHS Raghagan	High	Khar					1			1	0	2
10075	GGMS Khuna	Middle	Salarzai	1		1							2
10093	GGPS Raghagan	Primary	Khar							1			1
10094	GGPS Shah Nari	Primary	Khar						1				1
10098	GGPS Derakai	Primary	Salarzai							1			1
10105	GGMS Civil Colony Nawagai	Middle	Nawagai	1									1
10110	GGHS Malkana Nawagai	High	Nawagai	3			1	1					5
10124	GGPS Gud Khe	Primary	Nawagai							1			1
10126	GGPS Shagi	Primary	Nawagai							1			1
10153	GGPS Tang Khata	Primary	Khar						1				1
10160	GGHS Khar	High	Khar									1	1
10189	GGPS Sheikh Baba	Primary	Khar						1				1
10195	GGPS Mozamin Khan Killi	Primary	Khar							1			1
10196	GGPS Wali Shah Batai	Primary	Khar						1				1
10213	GGHS Bandagai	High	Utmankhel					1			1	0	2
10229	GGPS Jan Killi	Primary	Utmankhel							1			1
10230	GGPS Swal Qillah	Primary	Utmankhel							1			1
10234	GGPS Spina Dhrai	Primary	Utmankhel							1			1
10236	GGPS Shukrata	Primary	Utmankhel							1			1
10272	GGPS Inazari	Primary	Khar						1				1
10322	GGPS Mina No.1	Primary	Mamund						1				1
10326	GGPS Zagai	Primary	Mamund							1			1
10354	GGPS Karkanai Charmang	Primary	Nawagai							1			1
10359	GGMS Barkhalozo	Middle	Mamund	1		1							2
10360	GGMS Ghakai	Middle	Mamund			1	1						2
10383	GGPS Tarkho	Primary	Mamund						1				1
10385	GGPS Umari	Primary	Mamund							1			1

Appellant

**School-wise District Cadre & PST Vacant Posts for recruitment in District Bajaur [ FEMALE ]**

School Code/ EMIS ID	Name of College/School	Level	Tehsil/ village	GT (BPS-15)	PET (BPS-15)	DM (BPS-15)	AT (BPS-15)	Qari (BPS-12)	TI (BPS-15)	PST (BPS 12)	Lab Assistant BPS-07	IT Lab Incharge BPS-07	Total
10386	GGPS Niag No1	Primary	Mamund							1			1
10392	IHC Barkhalzo	Primary	Mamund	1									1
10411	GGPS Kitkot	Primary	Mamund							1			1
10502	GGHS Pashat	High	Salarzai	2		1		1			1	0	5
10535	GGPS Ghakhai	Primary	Salarzai						1				1
10536	GGPS Sar Azghai	Primary	Salarzai							1			1
10597	GGPS Menz Kamangrah	Primary	Nawagai							1			1
10599	GGHS Nari Tangai	High	Salarzai	1		1					1	0	3
10611	GGHS Ghazi Baba	High	Utmankhel			2	1				1	0	4
10617	GGMS Kotkai Charmang	Middle	Nawagai	2		1	1						4
10618	GGMS Loi kharkai	Middle	Mamund	1		1	1						3
10624	GGMS Kohi	Middle	Salarzai	1		1							2
10625	GGMS Agra	Middle	Mamund	1		1	1						3
10626	GGHS Kamal Dara	High	Barang			1	1				1	0	3
10627	GGMS Ghani Adai	Middle	Khar			1							1
10629	GGMS Derago	Middle	Utmankhel			1	1						2
10630	GGMS Chingai	Middle	Salarzai				1						1
10637	GGHS Sherbatai	High	Barang								1	0	1
10677	GGPS Chamarkand	Primary	Chamarkand						1	2			2
10681	GGMS Jawdro Arang	Middle	Utmankhel	1									1
10882	GGMS Wali Shah Batai	Middle	Khar	1									1

→ Till Vacant

رجسٹر حاضری نذرسین و ...  
 بابت ماہ ...

No	Present				Absent			
	P	P	P	P	A	A	A	A
1	P	P	P					
2	P	P	P					
3	P	P	P					
4	P	P	P					
5	Sunday							
6	P	P	P					
7	P	P	P					
8	P	P	P					
9	P	P	P					
10	P	P	P					
11	P	P	P					
12	P	P	P					
13	Sunday							
14	P	P	P					
15	P	P	P					
16	P	P	P					
17	P	P	P					
18	P	P	P					
19	P	P	P					
20	Sunday							
21	P	P	P					
22	P	P	P					
23	P	P	P					
24	P	P	P					
25	P	P	P					
26	P	P	P					
27	Sunday							
28	P	P	P					
29	P	P	P					
30	P	P	P					
31	P	P	P					

*(Handwritten signature and notes)*

103

10

10

10

رجسٹر جاضری  
برائے اساتذہ کرام  
گورنمنٹ گرلز پرائمری  
سکول صدیق آباد 2015ء

C.G.P.S Sadiq Abad

رجسٹر حاضرین نذر حسین

2019 APRIL

بابت ماہ

Shameem Saad P.S.T 15			Fatima Bibi S.T.T 14			Sabreen Bibi P.S.T 12			Dilber Begum P.S.T 15		
آد	دستخط	ادائیگی	آد	دستخط	ادائیگی	آد	دستخط	ادائیگی	آد	دستخط	ادائیگی

SPRING HOLI DAYS

8/5	11:00	8/5	7:30	8/5	11:00	8/5	7:30	- C/L	CAVE	-	8
8/5	11:00	8/5	7:30	8/5	11:00	8/5	7:30	8/5	11:00	8/5	7:30
8/5	11:00	8/5	7:30	8/5	11:00	8/5	7:30	8/5	11:00	8/5	7:30
8/5	11:00	8/5	7:30	8/5	11:00	8/5	7:30	8/5	11:00	8/5	7:30
8/5	11:00	8/5	7:30	8/5	11:00	8/5	7:30	8/5	11:00	8/5	7:30
8/5	11:00	8/5	7:30	8/5	11:00	8/5	7:30	8/5	11:00	8/5	7:30
8/5	11:00	8/5	7:30	8/5	11:00	8/5	7:30	8/5	11:00	8/5	7:30
SUNDAY						SUNDAY					
8/5	11:00	8/5	7:30	8/5	11:00	8/5	7:30	8/5	11:00	8/5	7:30
9/9	11:00	9/9	7:30	9/9	11:00	9/9	7:30	9/9	11:00	9/9	7:30
9/9	11:00	9/9	7:30	9/9	11:00	9/9	7:30	9/9	11:00	9/9	7:30
M/Leave - C/Leave						M/Leave - C/Leave					
10/10	11:00	10/10	7:30	10/10	11:00	10/10	7:30	10/10	11:00	10/10	7:30
SUNDAY						SUNDAY					
M/Leave	11:00	11:00	7:30	11:00	11:00	11:00	7:30	11:00	11:00	11:00	7:30
11/11	11:00	11/11	7:30	11/11	11:00	11/11	7:30	11/11	11:00	11/11	7:30
11/11	11:00	11/11	7:30	11/11	11:00	11/11	7:30	11/11	11:00	11/11	7:30
11/11	11:00	11/11	7:30	11/11	11:00	11/11	7:30	11/11	11:00	11/11	7:30
11/11	11:00	11/11	7:30	11/11	11:00	11/11	7:30	11/11	11:00	11/11	7:30
SUNDAY						SUNDAY					
M/Leave	11:00	11:00	7:30	11:00	11:00	11:00	7:30	11:00	11:00	11:00	7:30
12/12	11:00	12/12	7:30	12/12	11:00	12/12	7:30	12/12	11:00	12/12	7:30
12/12	11:00	12/12	7:30	12/12	11:00	12/12	7:30	12/12	11:00	12/12	7:30
12/12	11:00	12/12	7:30	12/12	11:00	12/12	7:30	12/12	11:00	12/12	7:30
12/12	11:00	12/12	7:30	12/12	11:00	12/12	7:30	12/12	11:00	12/12	7:30
12/12	11:00	12/12	7:30	12/12	11:00	12/12	7:30	12/12	11:00	12/12	7:30
12/12	11:00	12/12	7:30	12/12	11:00	12/12	7:30	12/12	11:00	12/12	7:30

مہینہ	روز	سابقہ	بیزنس	مال	سابقہ	بیزنس	مال	سابقہ	بیزنس	مال	سابقہ	بیزنس	مال

Handwritten signature and date: 12/12/19

رجسٹر حاضری نڈر سین  
 CaCa P.S. Sadiq Abad  
 2019

Shameem saq		Fatima Bibi		Sahreen Bibi		Dilbar Begum		نمبر
P.S.T		S.T.T		P.S.T		P.S.T		عیدہ
آر	دستخط	آر	دستخط	آر	دستخط	آر	دستخط	وقت
8/12	SS	7.30	12.00	7.30	12.00	7.30	12.00	7.30
SUNDAY		SUNDAY		SUNDAY		SUNDAY		1
9/12	SS	7.30	12.00	7.30	11.00	7.30	11.00	7.30
SUNDAY		SUNDAY		SUNDAY		SUNDAY		2
Eid ul Fitr								
3								
4								
5								
6								
10/12	SS	7.30	12.00	7.30	12.00	7.30	12.00	7.30
SUNDAY		SUNDAY		SUNDAY		SUNDAY		7
11/12	SS	7.30	12.00	7.30	12.00	7.30	12.00	7.30
SUNDAY		SUNDAY		SUNDAY		SUNDAY		8
12/12	SS	7.30	12.00	7.30	12.00	7.30	12.00	7.30
SUNDAY		SUNDAY		SUNDAY		SUNDAY		9
13/12	SS	7.30	12.00	7.30	12.00	7.30	12.00	7.30
SUNDAY		SUNDAY		SUNDAY		SUNDAY		10
14/12	SS	7.30	12.00	7.30	12.00	7.30	12.00	7.30
SUNDAY		SUNDAY		SUNDAY		SUNDAY		11
15/12	SS	7.30	12.00	7.30	12.00	7.30	12.00	7.30
SUNDAY		SUNDAY		SUNDAY		SUNDAY		12
16/12	SS	7.30	12.00	7.30	12.00	7.30	12.00	7.30
SUNDAY		SUNDAY		SUNDAY		SUNDAY		13
17/12	SS	7.30	12.00	7.30	12.00	7.30	12.00	7.30
SUNDAY		SUNDAY		SUNDAY		SUNDAY		14
18/12	SS	7.30	12.00	7.30	12.00	7.30	12.00	7.30
SUNDAY		SUNDAY		SUNDAY		SUNDAY		15
19/12	SS	7.30	12.00	7.30	12.00	7.30	12.00	7.30
SUNDAY		SUNDAY		SUNDAY		SUNDAY		16
20/12	SS	7.30	12.00	7.30	12.00	7.30	12.00	7.30
SUNDAY		SUNDAY		SUNDAY		SUNDAY		17
21/12	SS	7.30	12.00	7.30	12.00	7.30	12.00	7.30
SUNDAY		SUNDAY		SUNDAY		SUNDAY		18
22/12	SS	7.30	12.00	7.30	12.00	7.30	12.00	7.30
SUNDAY		SUNDAY		SUNDAY		SUNDAY		19
23/12	SS	7.30	12.00	7.30	12.00	7.30	12.00	7.30
SUNDAY		SUNDAY		SUNDAY		SUNDAY		20
24/12	SS	7.30	12.00	7.30	12.00	7.30	12.00	7.30
SUNDAY		SUNDAY		SUNDAY		SUNDAY		21
25/12	SS	7.30	12.00	7.30	12.00	7.30	12.00	7.30
SUNDAY		SUNDAY		SUNDAY		SUNDAY		22
26/12	SS	7.30	12.00	7.30	12.00	7.30	12.00	7.30
SUNDAY		SUNDAY		SUNDAY		SUNDAY		23
27/12	SS	7.30	12.00	7.30	12.00	7.30	12.00	7.30
SUNDAY		SUNDAY		SUNDAY		SUNDAY		24
28/12	SS	7.30	12.00	7.30	12.00	7.30	12.00	7.30
SUNDAY		SUNDAY		SUNDAY		SUNDAY		25
29/12	SS	7.30	12.00	7.30	12.00	7.30	12.00	7.30
SUNDAY		SUNDAY		SUNDAY		SUNDAY		26
30/12	SS	7.30	12.00	7.30	12.00	7.30	12.00	7.30
SUNDAY		SUNDAY		SUNDAY		SUNDAY		27
31/12	SS	7.30	12.00	7.30	12.00	7.30	12.00	7.30
SUNDAY		SUNDAY		SUNDAY		SUNDAY		28

تقریرت	ط	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان	حال
انعامیہ										
استحقاق										
بیاری										
میزان										

دستخط پرنسپل



G.G.P.S. Sadia, Abad

رجسٹر حاضرین ندرستین

2019

AUGUST

بابت ماہ

Shameem Saeed P.S.T			Fatima Bibi S.T.T			Sabreen Bibi P.S.T			Dilbea Begum P.S.T			نمبر			
آدم	دستخط	وقت	آدم	دستخط	وقت	آدم	دستخط	وقت	آدم	دستخط	وقت	نمبر			
SS	12:30	7:30	Em	19:30	Em	7:30	St	12:30	St	7:30	Em	12:30	Em	7:30	1
SS	12:30	7:30	Em	11:00	Em	7:30	St	11:00	St	7:30	C/leave	-	-	-	2
SS	12:30	7:30	Em	19:30	Em	7:30	C	leave	-	-	Em	12:30	Em	7:30	3
SUN DAY			SUN DAY			SUN DAY			SUN DAY				4		
SS	12:30	7:30	Em	19:30	Em	7:30	St	12:30	St	7:30	Em	12:30	Em	7:30	5
SS	12:30	7:30	C/leave	-	-	St	12:30	St	7:30	Em	12:30	Em	7:30	6	
SS	12:30	7:30	Em	19:30	Em	7:30	St	12:30	St	7:30	Em	12:30	Em	7:30	7
SS	12:30	7:30	Em	19:30	Em	7:30	St	12:30	St	7:30	Em	12:30	Em	7:30	8
SS	12:30	7:30	Em	19:30	Em	7:30	St	12:30	St	7:30	Em	12:30	Em	7:30	9
SS	12:00	7:30	Em	19:30	Em	7:30	St	12:00	St	7:30	Em	12:00	Em	7:30	10
SUN DAY			SUN DAY			SUN DAY			SUN DAY				11		
Eid ul Azha Mubarak														12	
Eid ul Azha Mubarak														13	
Eid ul Azha Mubarak														14	
SS	12:30	7:30	Em	11:30	Em	7:30	St	11:30	St	7:30	Em	11:30	Em	7:30	15
SS	12:30	7:30	Em	12:30	Em	7:30	St	12:30	St	7:30	Em	12:30	Em	7:30	16
SUN DAY			SUN DAY			SUN DAY			SUN DAY				17		
SS	12:30	7:30	Em	19:30	Em	7:30	St	12:30	St	7:30	Em	12:30	Em	7:30	18
SS	12:30	7:30	Em	12:30	Em	7:30	St	12:30	St	7:30	Em	12:30	Em	7:30	19
SS	12:30	7:30	Em	12:30	Em	7:30	St	12:30	St	7:30	Em	12:30	Em	7:30	20
SS	12:30	7:30	Em	12:30	Em	7:30	St	12:30	St	7:30	Em	12:30	Em	7:30	21
SS	12:30	7:30	Em	12:30	Em	7:30	St	12:30	St	7:30	Em	12:30	Em	7:30	22
SS	12:30	7:30	Em	11:30	Em	7:30	St	11:30	St	7:30	Em	11:30	Em	7:30	23
SS	12:30	7:30	Em	12:30	Em	7:30	St	12:30	St	7:30	Em	12:30	Em	7:30	24
SUN DAY			SUN DAY			SUN DAY			SUN DAY				25		
SS	12:30	7:30	Em	12:30	Em	7:30	St	12:30	St	7:30	Em	12:30	Em	7:30	26
SS	12:30	7:30	Em	12:30	Em	7:30	St	12:30	St	7:30	Em	12:30	Em	7:30	27
SS	12:30	7:30	C/leave	-	-	St	12:30	St	7:30	Em	12:30	Em	7:30	28	
SS	12:30	7:30	Em	19:30	Em	7:30	St	12:30	St	7:30	C/leave	-	-	29	
SS	12:30	7:30	Em	19:30	Em	7:30	St	11:30	St	7:30	Em	11:30	Em	7:30	30
SS	12:30	7:30	Em	11:30	Em	7:30	St	11:30	St	7:30	Em	11:30	Em	7:30	31

تقریرت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
آفتاب												
آسمان												
بیماری												
میزان												

دستخط ہیڈ ماسٹر

G.G.P.S Sadiq Abad

رجسٹر حاضری ندر سین

2014

September

بابت ماہ


Nameem Saeed		Fatima Bibi		Sabreen Bibi		Dilber Begum	
P.S.T		S.T.T		P.S.T		P.S.T	
ام	دستخط	ام	دستخط	ام	دستخط	ام	دستخط
SUNDAY							
12.3	SS 7.3	12.30	7.30	12.30	7.30	12.30	7.30
12.3	SS 7.3	12.30	7.30	12.30	7.30	12.30	7.30
Leave	-	12.30	7.30	12.30	7.30	12.30	7.30
12.3	SS 7.3	12.30	7.30	12.30	7.30	12.30	7.30
12.3	SS 7.3	12.30	7.30	12.30	7.30	12.30	7.30
12.3	SS 7.3	11.00	7.30	11.30	7.30	11.30	7.30
12.3	SS 7.3	12.30	7.30	12.30	7.30	12.30	7.30
SUNDAY							
Ashara Day				Ashara Day			
12.3	SS 7.3	9.30	7.30	12.30	7.30	12.30	7.30
12.3	SS 7.3	12.30	7.30	12.30	7.30	12.30	7.30
12.3	SS 7.3	11.30	7.30	C/leave	-	12.30	7.30
12.3	SS 7.3	12.30	7.30	12.30	7.30	12.30	7.30
SUNDAY							
12.3	SS 7.3	12.00	7.30	12.30	7.30	12.30	7.30
12.3	SS 7.3	12.30	7.30	12.30	7.30	12.30	7.30
12.3	SS 7.3	19.30	7.30	C/leave	-	12.30	7.30
12.3	SS 7.3	12.30	7.30	12.30	7.30	12.30	7.30
11.30	SS 7.3	11.30	7.30	11.30	7.30	11.30	7.30
12.3	SS 7.3	12.30	7.30	12.30	7.30	12.30	7.30
SUNDAY							
12.3	SS 7.3	C/leave	-	12.30	7.30	12.30	7.30
12.3	SS 7.3	12.30	7.30	12.30	7.30	12.30	7.30
12.3	SS 7.3	12.30	7.30	12.30	7.30	12.30	7.30
C/leave	-	C/leave	-	12.30	7.30	12.30	7.30
12.3	SS 7.3	12.30	7.30	11.30	7.30	11.30	7.30
12.3	SS 7.3	12.30	7.30	12.30	7.30	12.30	7.30
SUNDAY							

بیماری	حالت	سابقہ	بیماری	حالت	سابقہ	بیماری	حالت	سابقہ	بیماری

دستخط ہیڈ ماسٹر

## DISTANCE CERTIFICATE

It is certified that total distance from Civil Colony Khar to Inayat Killi is 6-Kms. Inayat Killi to Loe Sum Via Sadiq Abad Pattak is 12-Kms. Total Distance is 18-Kms.

  
Divisional Head Draftsman  
Highway FATA Division Bajaur  
30/9/2019

①

DPP

Page 1



**OFFICE OF THE AGENCY EDUCATION OFFICER  
AT KHAR BAJAUR AGENCY**

**NOTIFICATION**

In the light of upgradation of posts for grant of incentives of higher pay scale to primary school teachers (PSTs) vide Govt of KPK (E&SE) department Notification No: SO(B&A)/1-18/E&SE/2012, duly endorsed by the Directorate of Education FATA Peshawar No: 8233-60, dated 08-08-2016 and as per minutes issued by departmental Promotion Committee convened on 27/10/2016 at Education office Bajaur under the chairmanship of AEO Bajaur, the following 66 Female primary school teachers (PSTs) BS-12 are hereby upgraded to Primary School Head Teachers (PSHTs) BS -15 w.e.f 01-07-2012 under the following terms and conditions.

Sl. No.	Name of Teacher	Name of Head Teacher	Name of School
1	Hussain Ara	Abdur Rahman	GGPS Bai Khan Shah
2	Tawhid Bibi	Syed Habib Shah	GGPS Mamunzoo
3	Rahmat Bibi	Bahadar Khan	GGPS Daradola Tor Jan Killi
4	Naveela Perveen	Qazi Muhammad	GGPS Khar
5	Nasrin Begum	Razam Khan	GGPS Mano Derai No 1
6	Haroon Nisa	Baghdad Ali	GGPS College Colony
7	Rashki Chaman	Rahmetullah	GGPS Jawdaro
8	Gul Haram	Abdul Hanan	GGPS Kamadara
9	Naeema Begum	Muhammad Zamin	GGPS Jar
10	Bibi Zainab	Muhammad Jan	GGPS Qadar Khan Killi
11	Shagufta Naz	Ali Akbar Khan	GGPS Chenagai
12	Zalida Begum	Bacha Ghulam	GGMS Raghagan
13	Nezia Akbar	Jan Akbar	GGPS Zagal namund
14	Noor Jehan	Ponba Gul	GGPS Pampokha
15	Nilofar Begum	Ashraf Khan	GGPS Tani
16	Naseem Begum	Raqeeb Khan	GGPS Colony Nawagai
17	Raeesa Gul	Habib Rasool	GGPS Bandagai
18	Zahila Bibi	Khan Dad Khan	GGPS Loi Kharkai
19	Shaheda Rahimi	Rahim Shah	GGPS Kassai
20	Nasrat Bibi	Soudagar	GGPS Umarai
21	Mihar Begum	Qadar Muhammad	GGPS Muzamin Khan killi
22	Delber begum	Ghulam Hazrat	GGMS Sadiq Abad
23	Safia Begum	Sher Zaman	GGPS Dag Oillah
24	Sumeera Begum	Pazal Hussain	GGPS Mato Chinagai

Sl. No.	Name of official / Teacher	Name of official / Teacher	Name of official / Teacher
X 25	Noor Zia	Ihsanulla	GGPS Pashat
X 26	Malka Bilqees	Nazar Gul	GGPS Kbar
X 27	Hussan Bano	Jan Khan	GGMS Khair Abad
28	Zainab Bibi	Alam Zeb	GGPS Nawa Killi
29	Sarwata	Faqir Muhammad	GGPS Janat Shah
X 30	Basmin Begum	Gul Dad Khan	GGPS Tira Bartrass
31	Zuhra Bibi	Amin Jan. X	GGPS Kodkai Charnang
32	Noorul Anwar	Fazal Abad	GGPS Kamadara
33	Niaz Begum	Muhammad Darvesh	GGPS Niag No 2
34	Khalida Begum	Ghulam Muhammad X	GGPS palang
35	Miss Shafqat	Noorul Haq	GGPS Ghakhai
X 36	Khalida Haider	Ghulam Haider	GGPS Jar
37	Nasrat Begum	Muhammad Din Khan	GGPS Khona
38	Zuhra Begum	Gul Khan	GGPS Niag No 1
39	Azra Begum	Khaista Mand	GGPS Rahim Abad Arang
40	Yasmeen Begum	Bakht Bucha	GGPS Anwar Abad
41	Hamsuda Bibi X	Hazrat Muhammad Syed	GGPS Badan
42	Gul Siraja	Fanizar	GGPS Narai Tangai
43	Khalida X	Muhammad Ashraf	GGPS Bazar Nawagai
X 44	Zuhra Nasreen X	Bakht Zada	GGPS Mirwais Arang
45	Nasrin Bibi	Muhammad Rasool	GGPS Agra
46	Farhad Aziz	Aziz ur Rahman	GGPS Balolai
47	Yasmin Gul	Muhammad Gul	GGPS Bandagai
48	Tawheed Begum	Alam Zeb	GGPS Pashat
49	Kalsoom	Muhammad Sher	GGPS Bazar Nawagai
50	Zahida Bibi	Muhammad Amin	GGPS Sharbatai
51	Shaheen shah	Ghulam Nabi	GGPS Khawaga China
52	Sadarat	Malik Ahmad	GGPS Swal Qilla
53	Muslim Bibi	Abdul Nabi	GGPS Shandai More
54	Shahli Bahan	Amir Hamza	GGPS Dag Qillah
55	Shaheen Begum	Abdur Rahman	GGPS Sangarai
56	Mumtaz Begum	Noor Muhammad	GGPS Tangi Balolai
57	Talbi Begum	Ghulam Hazrat	GGPS Palang
58	Shah Bibi	Nadar Khan	GGPS Kamar
59	Rabihat Begum	Abdur Rahman	GGPS Samasni

Sl. No.	Name of official / Teacher	Final Name	Present place of duty
60	Nasreen Jabeen	Muhammad Hanif	GGPS Nisar Abad
61	Nezakat Begum	Bakht Munir	GGPS Loi baba
62	Tasleem Begum	Afzal Khan	GGPS Guli Bagh Matakko
63	Raveeda Begum	Amir jamal	GGPS Shah Nari
64	Amina Bibi	Munta Khan	GGPS Kajoral Barang
65	Nobahar	Bakht Zada	GGPS Bado Arang
66	Nasim Akhtar	Mehboob Khan	GGPS Spina Tega

## Terms and conditions.

1. They will be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations issued from time to time by the Govt.
3. Their services can be terminated at any time in case their performance is found unsatisfactory during the probation period, in case of misconduct they will proceed under the rules from time to time.
4. Charge reports should be submitted to all concerned after their further adjustment orders.
5. Their Inter Seniority on lower post will remain intact.
6. No TA/DA is allowed for joining their duty.
7. They will give an undertaking to be recorded in their service books to the effect that if any overpayment made to them in the light of this order will be recovered from them and if they are wrongly promoted they will be reversed.

(Muhammad Aslam Khan)  
AGENCY EDUCATION OFFICER  
BAJAUR AGENCY

Endst No: 6540-45 Dated 02/11/2016  
copy to the

1. Director of Education FATA Peshawar.
2. Political Agent Bajaur Agency.
3. Agency Accounts officer Bajaur Agency.
4. AAEO Female Concerned.
5. official Concerned.
6. Accountant of the local office.

*Maukhe*  
AGENCY EDUCATION OFFICER  
BAJAUR AGENCY

Appellant's

Annex: E

(Annexure/E)

District Education Officer  
Bajaur at Khar

No. 843 dated 18/09/2018  
Email: acobajaur@gmail.com Voice & Fax: 02912220395



To


The Director Education  
Newly merged districts KPK Peshawar.

Subject: -  
Memo:-

CANCELLATION OF TRANSFER ORDER.

Reference your office letter No. 11794 dated 17/09/2018 on the subject noted above and the letter No. 11538 dated 07/09/2018 on the same mention subject, the transfer has been issued by the undersigned due to disobedient ship and explanation.


Therefore; the transfer order vide No. 444-48 dated 17/08/2018 has been remain for the interest of public service.

  
District Education Officer  
Bajaur

Endst: No. 844-47  
Copy forwarded to the:

1. ADEO (F) Concerned.
2. Accountant of the local office.
3. Mist: Dilbar Begum PST GGPS Loi Sum.
4. Mist: Shamim Saeed PST GGPS Sadiq Abad.

Dated 18/09/2018

  
District Education Officer  
Bajaur

Appellant

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DIRECTORATE OF EDUCATION  
 NEWLY MERGED TRIBAL DISTRICTS  
 WARSAK ROAD PESHAWAR, PAKISTAN  
 PHONE: 091-9210166, FAX 091-9210216

No. 11794 /Date Pesh: the / 17/9 /2018.  
 E-6/New/Bajaur. (Annexure/D)

The District Education Officer  
Bajour District.

Subject; CANCELLATION OF TRANSFER ORDER.

Memo;  
I am directed to refer to this office letter No. 11538 dated 7/9/2018 on the above noted subject and to enclose herewith an application in respect of Mst; Shamim Saeed PST; GGPS Sadiq Abad, Bajaur District with the remarks to decide the instant case at your own level in the interest of public service please.

Encl: As Above.

*[Signature]*  
Deputy Director (Estab) 17/9/18

Endst: No. \_\_\_\_\_ /-

Dated Pesh: the \_\_\_\_\_ /2018.

Copy to:-

PA to Director Education, NMTD.

*[Signature]*  
Deputy Director (Estab)

*BAE O/E*  
*H/K*  
*B*  
*17/9/2018*

*[Signature]*  
*for reply*





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DIRECTORATE OF EDUCATION  
NEW MERGED DISTRICTS  
KHAYBER PAKHTUNKHWA, WARSAK ROAD PESHAWAR, PAKISTAN  
PHONE: 091-9210166 FAX 091-9210216

NO. 12371-83 DATED 4/10/18  
A-12 GULA JAN SST

Amir F

Appellant

To: All the District Education Officers,  
Newly Merged Tribal Districts.

Subject: Ban on Transfer.

The Competent Authority has been pleased to impose Ban on all kind of transfers in the interest of students till December 2018 with immediate effect.

Deputy Director (Estab)

Endst. No. 1-  
Copy to:  
1. PU to Secretary SSD Newly Merged Tribal Districts.  
2. PA to Director Education Newly Merged Districts.

Deputy Director (Estab)

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**District Education Officer  
Bajaur at Khar**

Email: [redacted]

Voice & Fax +92942220395

(Annexure/F)

**TRANSFER ORDER**

Mst. Shamim Saeed PST GGPS Sadiq Abad is hereby transferred to GGPS Loi Sum in her own pay and scale in the interest of public service.

Note: -

- (i) No TA / DA allowed.
- (ii) Necessary entries should be made in their service books.

**District Education Officer  
Bajaur**

Endst: No: 1594-97. Dated 05/11 2018.

Copy of the above is forwarded to the:

1. Director Education newly merged districts KPK Peshawar.
2. District Accounts Office Bajaur.
3. Accountant of the local office.
4. Official Concerned.

*[Handwritten Signature]*  
**District Education Officer  
Bajaur**

*[Handwritten Initials]*

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Approved B

(Amrullah Wazir/A)



District Education Officer  
Bajaur at Khar

Email [aeobajaur@gmail.com](mailto:aeobajaur@gmail.com)

Voice & Fax +92942220395

**TRANSFER ORDER**

Mist: Shamim Saeed PST GGPS Chamarkand is hereby transferred to GGPS Sadiq Abad on her own pay and scale in the interest of public service.

Note: -

- (i) No TA / DA allowed.
- (ii) Necessary entries should be made in their service books.

Already  
Closed

(Amrullah Wazir)  
District Education Officer  
Bajaur

Endst: No: 444-48 Dated 17/08/2018

Copy of the above is forwarded to the:

1. Director Education newly merged districts KPK Peshawar.
2. District Accounts Office Bajaur.
3. Accountant of the local office.
4. ADEO (F) Concerned.
5. Official Concerned:

Amrullah Wazir  
District Education Officer  
Bajaur

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Appellant

(Annexure/B)

OFFICE OF THE DISTRICT EDUCATION OFFICER  
BAJAUR AGENCY AT KHAR

NO \_\_\_\_\_ /P&D/ DATED \_\_\_\_\_ /2018

Phone & Fax No.0942-220395  
Email :khanzad1236@gmail.com

The Deputy Commissioner  
Bajaur Agency.

Subject: - APPEAL FOR CANCELLATION OF TRANSFER IN RESPECT OF DILBAR BEGUM  
GGPS SADIQ ABAD IN BAJAUR AGENCY.

Kindly refer to your dairy No.6876 dated 3/09/2018 and your remarks on the body of  
the application regarding subject cited above.

In this regard, the head Teacher named Dilbar Begum PSHT GGPS Sadiq Abad had  
been proposed / nominated by Directorate of Education FATA vide his office letter No. 14572-74  
dated 21/6/2018 for Early Children Education Training (ECE) w.e.f 2-7-2018 to 16-06-2018 (15  
days) at GCET Jamrud and pursuance of DE FATA she was recommended vide this office letter  
No.27-5-218 dated 27/6/2018 (Copies attached). More over all the nominated/selected teachers were  
directed to attend the meeting at the office of the undersigned one day before for ensurance of training.  
She has received the nomination letter and also attended the Meeting but she did not participate /join  
the important training insisently as scheduled and did not obey the orders. In view of the above facts  
she was transferred under reportedly to GGPS Loisam. So report is submitted for your kind perusal  
as desired please.

District Education Officer  
Bajaur Agency

Slit No. 623-24 Dated 7-9-2018

Copy of the above is forwarded to the :-

1. Director of Education NMD /FATA for information
2. ADEO /AAEO (Female).

*Amir*  
District Education Officer  
Bajaur Agency