

Appeal No. 6353/20  
MST-Hajira Bibi

05.10.2022

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

Learned counsel for the appellant requested for adjournment on the ground that he has not prepared the brief. Adjourned. To come up for arguments on 02.11.2022 before D.B.



(Farecha Paul)  
Member (I)



(Kalim Arshad Khan)  
Chairman

02.11.2022

Clerk of learned counsel for the appellant present. Mr. Muhammad Riaz Khan Painsdakhel, Assistant Advocate General for the respondents present.

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is out of station. Adjourned. To come up for arguments on 27.12.2022 before D.B.



(Mian Muhammad)  
Member (E)



(Salah-ud-Din)  
Member (J)

27-12-22 Due to winter vacation.  
The case is adjourned to  
4-4-23

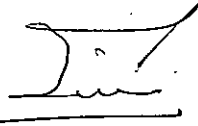


Reader

07.12.2021

Clerk of learned counsel for the appellant present: Mr. Kabirullah Khattak, Additional Advocate General for official respondents present.

Clerk of learned counsel for the sought adjournment as learned counsel for the appellant is not available today. Adjourned. Case to come up for arguments on 10.03.2022 before the D.B.




(Salah-ud-Din)  
Member (J)



Chairman

10-03-2022


Due to retirement of the Honorable Chairman the case is adjourned to come up for the same as before on 30-6-2022

  
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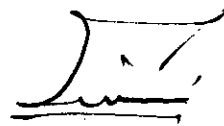
30.06.2022

Mr. Habib Ur Rehman, husband of appellant on behalf of appellant present. Messrs. Farhan Assistant and Shoaib Assistant alongwith Mr. Kabir Ullah Khattak, Additional Advocate General for respondents present.

Husband of appellant requested for adjournment on the ground that learned counsel for the appellant is busy before Hon'ble Peshawar High Court, Peshawar. Adjourned. To come up for arguments on 05.10.2022 before the D.B.



(Rozina Rehman)  
Member (J)



(Salah Ud Din)  
Member (J)

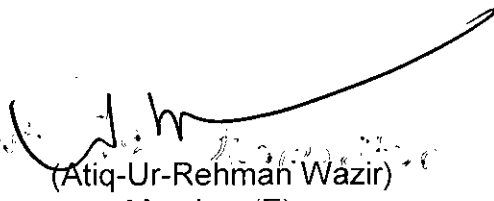
A.P. 6853/2020

12.10.2021

Counsel for appellant present.

Muhammad Riaz Khan Paindakheil learned Assistant Advocate General alongwith Jehanzeb Superintendent for official respondents present. Counsel for private respondent No.7 present.

Comments on behalf of respondents No.1 to 4 have already been submitted. Respondents No.5 & 6 having an incidental role, relied upon the comments furnished on behalf of respondents No.1 to 4. Counsel for private respondent No.7 also relied upon the comments of respondents No.1 to 4. To come up for arguments on 09.11.2021 before D.B.



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



(Rozina Rehman)  
Member (J)

09/11/2021

Mr. Khush Dil Khan, Advocate, for the appellant present. Ms. Lubna Farman, Assistant Director (Litigation) and Mr. Jehanzeb, Superintendent alongwith Mr. Javed Ullah, Assistant Advocate General for official respondents present. Syed Noman Ali Bukhari, Advocate, for private respondent No. 7 present, who requested for adjournment on the ground that as connected Service Appeal has been posted for 07.12.2021, therefore, the instant appeal be also fixed on the said date. Learned counsel for the appellant is having no objection on the adjournment. Adjourned. To come up for arguments on 07.12.2021 before the D.B.



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



(Salah-Ud-Din)  
Member (J)

09.06.2021

Hameed ur Rehman husband of appellant on behalf of appellant present.

Mr. Riaz Khan Paindakheil learned Assistant Advocate General alongwith Jehanzeb Awan Superintendent for official respondents No. 1 to 4 present. Muhammad Shoaib S.C representative alongwith counsel for respondents No. 5 & 6 present.

Comments on behalf of respondents No.1 to 4 have already been submitted. Because of incidental role of respondents No.5 & 6, learned counsel representing the said respondents also relies upon the comments furnished on behalf of respondents No.1 to 4. An application has been submitted for deletion of name of respondent NO.7 from memorandum of appeal and it was directed to the appellant for submission of reply which is still awaited. There is no need to wait for reply of the appellant to the said application which on its face seems to be misconceived. Respondent No.7 has been made party being transferee vice versa in the appeal, wherein, the order of transferee has been impugned, therefore, she is a proper party and her name needs not to be deleted. So, the application submitted for deletion of her name from the panel of respondents is dismissed being misconceived. Learned counsel for respondent No.7 seeks time for submission of reply on behalf of respondent No.7. Request is accorded. The written reply on behalf of respondent No.7 be submitted within 10 days in office, failing which, his right for reply shall be deemed as struck off. To come up for arguments on 12.10.2021 before D.B.

  
(Rozina Rehman)  
Member (J)

  
Chairman

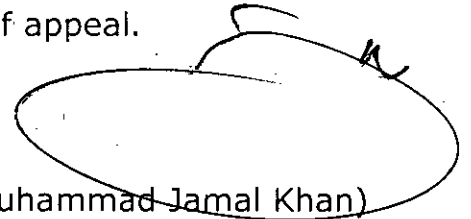
15.02.2021

Junior to the senior counsel for appellant is present. Mr. Kabirullah Khattak, Additional Advocate General for official respondents and Mr. Jehanzeb Superintendent alongwith counsel for respondent No. 7, are also present.

Written replies on behalf of respondents No. 1 to 4 have already been submitted while respondents No. 5 & 6 failed to submit their written replies/comments despite last chance given in the preceding order sheet dated 29.12.2020.

Respondents No. 7 submitted application for deletion of her name from the panel of respondents. Appellant is directed to submit reply to the application.

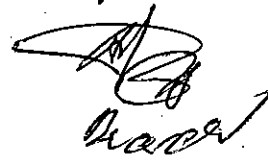
The rest of respondents have to submit reply positively on the next date and appeal is posted before the D.B for 07.05.2021 for submission of rejoinder, arguments on application and arguments on merits of appeal.



(Muhammad Jamal Khan)  
Member

7.5.2021

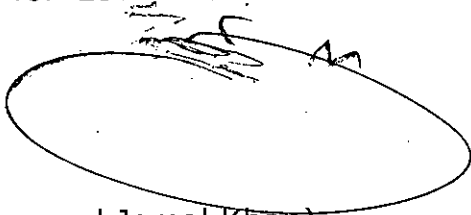
*Due to COVID-19, the case is adjourned to 6.9.2021 for the same.*



22.10.2020

Since the Members of the High Court as well as of the District Bar Association Peshawar are observing strike today, therefore, learned counsel for appellant is not available today. Mr. Kabirullah Khattak, Additional AG alongwith Mr. Shoaib, Senior Clerk, on behalf of respondent No. 4 are present.

Representative of respondent No. 4 seeks further time to submit written reply/comments while no one is present on behalf of remaining respondents nor written reply on their behalf is submitted, therefore, notices be issued to them for submission of written reply/comments for 29.12.2020 before S.B.

  
(Muhammad Jamal Khan)  
Member (Judicial)


29.12.2020

Appellant in person and Muhammad Rasheed DDA alongwith Jehanzeb Superintendent on behalf of respondents No. 1 to 3 present. None present on behalf of respondents No. 4 & 6.

Representative of respondents No. 1 to 3 submitted reply/comments which is placed on file. Reply on behalf of private respondent No.4 has already been submitted.

Syed Nouman Ali Bukhari Advocate has already submitted Vakalat Nama in favor of private respondent No. 7, alongwith the application for deleting the name of private respondent No.7 from the panel of respondents. The same is handed over to the appellant. Appellant seeks time for its reply. Learned DDA is required to contact the respondents No.5 & 6 and facilitate the submission of reply/comments.

Adjourned to 15.02.2021 before S.B, as a last chance.

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

Appeal No. 6353/2020

12.08.2020

Counsel for the appellant present.

Learned counsel provided copy of order dated 07.05.2020 passed in Service Appeal No. 3729/2020 by this Tribunal and contended that other incumbent transferred through impugned notification dated 06.02.2020 was granted the order of status quo upon admission of her appeal. He is of the view that the grounds available to the appellant in the referred appeal are similar to those relied upon by the appellant in the instant matter.

Subject to all just exceptions and on the strength of admitting note ibid instant appeal is admitted to regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments on 15.09.2020 before S.B.

Appellant Deposited  
Security & Process Fee

  
Chairman

15.09.2020

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

Learned AAG seeks adjournment in order to contact the respondents and furnish reply/comments. Adjourned to 07.10.2020 on which date the requisite reply/comments shall positively be furnished.

  
Chairman

07.10.2020

Junior to counsel for the appellant, Addl. AG for official respondents present. Syed Numan Bukhari, Advocate appeared on behalf of respondents No. 4 & 7 and furnished Wakalatnama in his favour.

Learned AAG as well as counsel for respondents No. 4 & 7 seek further time to furnish reply/comments. Learned AAG is required to contact the official respondents and to submit reply on next date.

Adjourned to 22.10.2020 on which date the requisite reply/comments shall be submitted without fail.



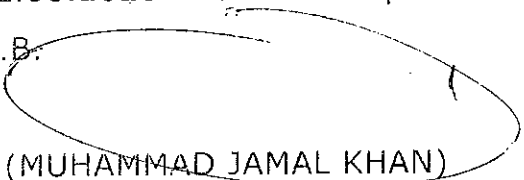
  
Chairman

Form- A

# FORM OF ORDER SHEET

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

Case No. - 6353 /2020

1S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	06/07/2020	<p>The appeal of Mst. Bibi Hajra presented today by Mr. Khushdil Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-		<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>23/07/2020</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
23.07.2020		<p>Appellant is absent. The legal fraternity is observing strike today therefore, no proceedings could be conducted. The case is adjourned to 12.08.2020. To come up for previous proceedings before S.B.</p> <p style="text-align: right;"> (MUHAMMAD JAMAL KHAN) MEMBER</p>



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No 6353 /2020

Mst: Bibi Hajira,  
Lecturer in Home Economics (BPS-17),  
Govt. Girls Degree College Sadda, Kurram,  
Under transfer to Govt. Girls Degree College Tall  
(Hangu).....Appellant.

Versus

The Chief Secretary,  
Govt. of Khyber Pakhtunkhwa,  
Civil Secretariat, Peshawar and others.....Respondents.

INDEX

S.N	Description of Documents	Date	Annexure	Pages
1.	Memo of Service Appeal.			1-4
2.	Copies of the Reliving Chit.	24-05-2019	A	5
3.	Copy of the letter.	24-06-2019	B	6
4.	Copy of the impugned Notification.	06-02-2020	C	7
5.	Copy of the departmental appeal.	04-03-2020	D	8
6.	Wakalat Nama.			

Through

Appellant

Khush Dil Khan  
Advocate,  
Supreme Court of Pakistan

&  
Ashraf Ali Khattak,  
Advocate,  
High Court, Peshawar

Dated: 06/07/2020

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 6353/2020

Mst: Bibi Hajira,  
Lecturer in Home Economics (BPS-17),  
Govt. Girls Degree College Sadda, Kurram,  
Under transfer to Govt. Girls Degree College Tall  
(Hangu).....Appellant.

**Versus**

1. The Chief Secretary,  
Govt. of Khyber Pakhtunkhwa,  
Civil Secretariat, Peshawar.
2. The Secretary,  
Govt. of Khyber Pakhtunkhwa,  
Higher Education Department,  
Civil Secretariat, Peshawar.
3. The Director,  
Higher Education Department,  
Khyber Pakhtunkhwa, Peshawar.
4. The Principal,  
Govt. Girls Degree College Sadda,  
District Kurram.
5. The Principal,  
Govt. Girls Degree College, Tall (Hangu).
6. The Principal,  
Govt. Girls Degree College Hangu.
7. Ms. Abida Dil Nasheen,  
Lecturer in History (BPS-17),  
GGDC Sadda, Kurram,  
Under transfer to GGDC Hangu.

SERVICE APPEAL UNDER SECTION 4 OF THE  
KHYBER PAKHTUNKHWA SERVICE  
TRIBUNALS ACT, 1974 AGAINST THE  
IMPUGNED ORDER DATED 06-02-2020 ISSUED BY

RESPONDENT No.2 THEREBY APPELLANT WAS TRANSFERRED FROM GGDC SADDA, KURRAM TO GGDC TALL (HANGU) AND BY THIS ORDER RESPONDENT No.7 WAS ALSO TRANSFERRED FROM GGDC SADDA, KURRAM TO GGDC HANGU AGAINST WHICH APPELLANT FILED DEPARTMENTAL APPEAL BEFORE THE RESPONDENT No.1 VIDE DATED 04-03-2020 BUT THE SAME WAS NOT DISPOSED OF WITHIN STATUTORY PERIOD OF 90 DAYS.

Respectfully Sheweth,

Facts giving rise to the present appeal are as under:


1. That appellant was initially appointed as Lecturer in Home Economics Subject (BPS-17) on Contract basis by an order dated 04-11-2010 and posted at Govt. Girls Degree College Alizai, Kurram. During this period her services were also regularized on 26-05-2014 along with other colleagues under similar circumstances.
2. That appellant then transferred to GGDC Sadda, Kurram in the year 2017 and assumed the charge of her duty accordingly and performing her duty efficiently and with the entire satisfaction of the students.
3. That during this period respondent No.7 was working as Incharge Principal of the College as well also exercising the power of Drawing Disbursing Officer (DDO) though in this respect no proper notification and order of the competent authority is available on the office record.
4. That respondent No.7 (Incharge Principal) has developed personnel grudges with the appellant on her request for the allotment of a vacant bungalow in the premises of the college of which she was annoyed and without any transfer order of the competent authority or with the approval of the competent authority, respondent No.7 (Incharge Principal) issued a Relieving Chit vide No. 130-07 dated 24-05-2019 in arbitrary manner and forcefully relieved by not allowing her to attend the classes against which she submitted an application to

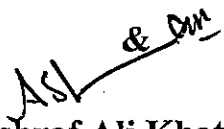
other side the monthly salaries of appellant have been stopped by the Incharge Principal (respondent No.7 in those days) which has not yet released as such appellant was discriminated and not treated equally which is her fundamental right which has been violated.

It is therefore, humbly prayed that on acceptance of this service appeal the impugned order dated 06-02-2020 whereby appellant was transferred from GGDC Sadda, Kurram to GGDC Tall (Hangu) may graciously be declared illegal, without lawful authority and malafide and the same may kindly be set aside and appellant be allowed to assume the charge of her duty in the GGDC Sadda, Kurram.

  
Appellant

Through

  
Khush Dil Khan,  
Advocate,  
Supreme Court of Pakistan

  
Ashraf Ali Khattak,  
Advocate,  
High Court, Peshawar

Dated: 06/07/2020

respondent No.2 (Secretary) on its acceptance an order was issued vide letter dated 24-06-2019 under the signature of Section Officer (Colleges-III) therein the Relieving Order was withdrawn with the direction to initiate disciplinary action against the Incharge Principal (respondent No.7). Copies of the Reliving Chit dated 24-05-2019 **Annexure-A** & the letter dated 24-06-2019 **Annexure-B**.

5. That on 06-02-2020 a Notification was issued by respondent No.2 thereby the appellant was transferred from GGDC Sadda, Kurram to GGDC Tall (Hangu) and by this same order respondent No.7 was also transferred from GGDC Sadda, Kurram to GGDC Hangu. Copy of the impugned Notification dated 06-02-2020 attached as **Annexure-C**.
6. That the appellant has challenged the impugned transfer order through her departmental appeal dated 04-03-2020 before the respondent No.1 but same was not disposed of within statutory period of 90 days. Copy of the departmental appeal dated 04-03-2020 is attached as **Annexure-D**.
7. Hence the present service appeal is submitted on the following grounds.

**Grounds:**

- A. That respondent No.2 has acted in arbitrary manner and unlawfully transferred the appellant from GGDC Sadda, Kurram to GGDC Tall (Hangu) by the impugned Notification without legal justification which is not tenable.
- B. That the impugned order to the extent of appellant has neither passed in the exigency of service nor in the public interest or on any complaint which is illegal and tainted with malafide intention.
- C. That respondent No.7 has not acted upon on the same order and she is still working in that very college (GGDC Sadda, Kurram) without any order of the cancellation of the impugned order or any stay order or decision of the competent court of law and even no action has been taken against her for non compliance of her transfer order to GGDC Hangu however she is receiving monthly salaries regularly from the said college while on the

RELIEVING CHIT

Annex: A  
P. 5

The services of Mst: BIBI HAJRA Lecturer in Home Economics BPS-17. is no longer required to this institution and is hereby relieved from duty on 23/05/2019 regarding her constant unrest, hurdles, unsocial and immoral attitude towards the undersigned, students of GGDC Sadda as well as staff members.

As per request of student parents to relieve her as per issue of making video and capture pictures of students at GGDC Sadda on 22/05/2019

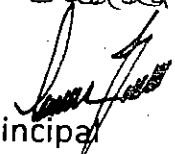
Her service is hereby placed at the disposal of Director Higher Education Khyber Pakhtunkhwa Peshawar, for further posting and initiate disciplinary action against the lecturer concerned under E & D rules 1973, 2001.

Principal  
Govt: Girls Degree College  
Sadda District Kurram

No. 103-07 Dated 24/5/2019

Copy to the

1. Secretary Higher Education Khyber Pakhtunkhwa Peshawar.
2. Director Higher Education at Peshawar.
3. Director Education Newly Merged Districts at Peshawar.
4. Deputy Commissioner at Parachinar District Kurram
5. District Accounts officer Kurram at Parachinar with the request to stop her pay and issue LPC as per source form enclosed.
- 6) Lecturer concerned at GGDC Sadda

  
Principal  
Govt: Girls Degree College  
Sadda District Kurram

Attached  
A



GOVERNMENT OF KHYBER PAKHTUNKHWA  
HIGHER EDUCATION, ARCHIVES &  
LIBRARIES DEPARTMENT

Annex-B  
P.6

No.SO(C-III)/HE/1-2/19/Hajira Bibi/  
Dated Peshawar, 24<sup>th</sup> June, 2019

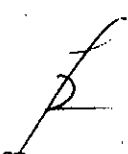
To

The Director Higher Education,  
Khyber Pakhtunkhwa, Peshawar.

Subject:

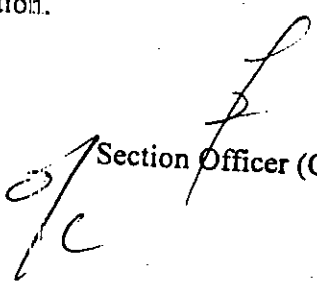
RELIEVING CHIT.

I am directed to enclose herewith a copy of the subject relieving chit issued by the Principal, GGDC, Sadda, District Kurram bearing No. 103-07 dated 28.05.2019 whereby Ms. Hajira Bibi, Lecturer in Home Economics has been relieved without any legal authority. The same may be treated as withdrawn and disciplinary action be initiated against the Principal concerned for the use of powers not authorized by the government.

  
Section Officer (Colleges-III)

CC to:

2. PS to Secretary Higher Education for information.

  
Section Officer (Colleges-III)

Attested  


Annex: C

GOVERNMENT OF KHYBER PAKHTUNKHWA  
HIGHER EDUCATION, ARCHIVES &  
LIBRARIES DEPARTMENT

Dated: Peshawar 06/02/2020

**NOTIFICATION**

No. SO(C III)/HEA/2/2020

The competent authority is pleased to order the following

transfers/posting in relaxation of ban in the best public interest:-

S. NO.	Name of Lecturer	From	To
1	Ms. Bibi Hajira, Lecturer in Home Economics	GGDC, Sadda (Kurram)	GGDC, Thall (Hangu)
2	Ms. Abida Dil Nasheen, Lecturer in History	GGDC, Sadda (Kurram)	GGDC, Hangu

SECRETARY TO  
GOVT. OF KHYBER PAKHTUNKHWA  
HIGHER EDUCATION DEPARTMENT

Transfers/Posting in Relaxation of Ban

- 1. Ms. Bibi Hajira, Lecturer in Home Economics, Government Girls Degree College, Sadda (Kurram)
- 2. Ms. Abida Dil Nasheen, Lecturer in History, Government Girls Degree College, Hangu

*Noted*

Section Officer (Colleges-III)



To

The Hon'ble Chief Secretary,  
Govt. of Khyber Pakhtunkhwa,  
Civil Secretariat, Peshawar.

Amear: D  
P. 8

Subject: Request for Release of salary and cancellation of transfer order.

Respected Sir,

It is stated that I have accommodation problem in GGDC Sadda for last few years. The Ex DDO Abida Dilnashin did not accommodate me, however she has illegally accommodated other staff & also she has deliberately closed one lecturer hostel (containing 18 quarters) for unknown reasons. Due to non opening of this hostel 18 lecturers & professors have been helplessly transferred from last few months.

She relieved me by force from the college & stopped my pay since June 2019 till now illegally.

Instead of solving my problems, concerned authorities has transferred me from the GGDC Sadda lower Kurram (which is my own home town) to GGDC than district Hangu without any reason, which is against transfer policy. On the other hand officers did not punished Abida according to E & D Service Rules, 2011 till yet & transferred her just to change the direction of case & to save her from punishment because she didn't accept the competent authority's orders. Ms. Abida's transfer is normal because she has already completed her five year tenure & Sadda is not her home town. And also Sadda College has shown poor performance for last few years due to lack of accommodation, harassment, incompetencies issues due to severe & criminal negligence of the Ex DO Ms. Abida & Ms. Shamida Bangash lecturer in zoology.

As this transfer is against transfer policy and my school going child will be suffer. There is no residential quarters in GGDC Thal. As I requested so many times that I have accommodation problem in Sadda due to long distance and pay 1500 daily for transportation. As I could not manage from dogar tehsil to GGDC Sadda, then how I will manage from Dogar to GGDC thal. Instead of solving my genuine problem in GGDC Sadda concerned authorities transferred me to GGDC thal district Hangu and put me in more problems.

So it is proved that competent authority is not serious in solving problems of those teachers and totally discriminate them, who want the college to be functional.

It is therefore, kindly requested that to cancel my transfer order and release my salary as soon as possible because I am facing lots of financial problems.

Thanks

Yours Sincerely

Bibi Hajira Lect: in GGDC Sadda Lower Kurram.

Dated 04-03-2020

WAKALAT NAMA

IN THE COURT OF Justice Eriband K.P. 1/1. Peshawar

Mst. Bibi Hajira Latif

in Home Economics Appellant(s)/Petitioner(s)

VERSUS

The Chief Executive Govt

K-P.K. Peshawar and others Respondent(s)

I/We Bibi Hajira do hereby appoint Mr. Khush Dil Khan, Advocate Supreme Court of Pakistan in the above mentioned case, to do all or any of the following acts, deeds and things.

1. To appear, act and plead for me/us in the above mentioned case in this Court/Tribunal in which the same may be tried or heard and any other proceedings arising out of or connected therewith.
2. To sign, verify and file or withdraw all proceedings, petitions, appeals, affidavits and applications for compromise or withdrawal or for submission to arbitration of the said case, or any other documents, as may be deemed necessary or advisable by them for the conduct, prosecution or defence of the said case at all its stages.
3. To receive payment of, and issue receipts for, all moneys that may be or become due and payable to us during the course of proceedings.

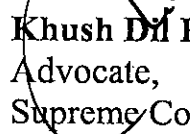
AND hereby agree:-

- a. That the Advocate(s) shall be entitled to withdraw from the prosecution of the said case if the whole or any part of the agreed fee remains unpaid.

In witness whereof I/We have signed this Wakalat Nama hereunder, the contents of which have been read/explained to me/us and fully understood by me/us this \_\_\_\_\_

Attested & Accepted by

  
Signature of Executants

  
Khush Dil Khan,  
Advocate,  
Supreme Court of Pakistan  
9-B, Haroon Mansion  
Off: Tel: 091-2213445

**VAKALATNAMA**

NO. 6353 /20

IN THE COURT OF KP Service Tribunal, Peshawar

Bibi Hajra (Appellant)  
(Petitioner)  
(Plaintiff)

VERSUS

H. Edo Dethu (Respondent)  
(Defendant)

I/We, Respondent No. 4

Do hereby appoint and constitute **SYED NOMAN ALI BUKHARI Advocate High Court Peshawar**, to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.

I/We authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

Dated \_\_\_\_\_/20

Respondents 4  
**Principal**  
**Mr. Sudda Kurran**  
CLIENT

ACCEPTED

**M. ASIF YOUSAFZAI**  
ADVOCATE SUPREME COURT

**SYED NOMAN ALI BUKHARI**  
Advocate High Court Peshawar.

**TAIMUR ALI KHAN**  
Advocate High Court Peshawar

**S. Khan**  
**SHAHKAR KHAN YOUSAFZAI**  
ADVOCATE PESHAWAR

Cell: (0306-5109438)

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

**Service Appeal No. 6353/2020**

Bibi Hajra

VS

Govt: of KPK.

.....

**REPLY ON BEHALF OF RESPONDENT NO.4**

.....

**RESPECTFULLY SHEWETH:**

**Preliminary Objections:**

1. The appellant has no locus standi and cause of action.
2. The appellant has not come with clean hands.
3. The appeal of the appellant is time barred hence not maintainable.
4. The appeal is not maintainable.
5. The appeal is bad for non-joinder and misjoinder of parties.
6. That according to Section-10 of the Civil Servant Act 1973 the appellant is bound to do his duty anywhere in the Province.
7. That the appellant was transfer in best public interest for smooth running of college the reason for transfer of the appellant was genuine one.
8. That the appellant already completed her tenure so the transfer of the appellant was not illegal but according to law and rules.

9. That the appellant got admission in M.PHIL at Home Economics College Peshawar due to which he remained absent. She was relieved due to absentia and reliving chit was withdrawn but she was not performing her duties.

**FACTS:**

1. Not related to relying respondent.
2. Incorrect. The appellant never performed her duties with the entire satisfaction of students and her superiors. There are several complaints against the appellant by students and staff of the college. While the appellant posted AT GGDC Alizai was punished for her absentia and misbehave and transfer to GGDC sada Khurram with allegation. Further the appellant also completed her normal tenure at GGDC Sadda Khuram therefore; the transfer order is legal one.
3. No comments and denied for want of knowledge.
4. Incorrect. The respondent no.7 has no personal grudges with the appellant. All the action done by the respondent is according to law and in best public interest and for smooth running of the college and for good future of the students. Further it is added that the respondent no.7 time to time wrote letter to authority but no action was taken. Thereafter when matter of taking picture and video of students came into knowledge and complaint was filed against the appellant and all community and public demanded for reliving of the appellant thereafter reliving chit was issued in best public interest and for smooth running of college. It is pertinent to mentioned here that the inquiry was conducted against the appellant wherein appellant was proved guilty. Moreover, the respondent no.7 never denied

to allot the bungalow in college premises but denied that the husband of the appellant cannot live in girl college premises, because the parda nasheen girls studying and living in college hostel. The plea of the appellant for living in college premises with husband is also rejected by the inquiry officer. **Copy of relevant documents is attached as an annexure-A**

5. Correct but the transfer order of the appellant was legal one and passed in best public interest. The competent authority can transfer the appellant anywhere in public interest and according to Section-10 of the Civil Servant Act 1973 the appellant is bound to do his duty anywhere in the Province
6. Incorrect. The appellant is not an aggrieved person but he wants to do his duty on his own choice of station. Which is violation of Section-10 of the Civil Servant Act 1973. Moreover the appellant did not file Departmental appeal as no diary and dispatch No. is mentioned on the departmental appeal of the appellant. Further it is added that the service appeal of the appellant has been also time barred.

**GROUND:**

- A. Incorrect. The order dated 06.02.2020 to the extent of appellant is according to law, facts, norms of justice and material on the record, hence liable to be maintained.
- B. Incorrect. The impugned order has been passed in exigency of service and in best public interest and for smooth running of administration. It is pertinent to mention here that in college GGDC Sadda Khurram no Home Economics Student available. So there is no need of Appellant being lecturer in Home Economics. Moreover as explained in above paras.

C. Incorrect and misconceived. The respondent no.7 got stay against the transfer order dated 06.02.2020 from this Hon'able tribunal Peshawar. Therefore, respondent no.7 performing her duties at GGDC Sadda Khurram as lecturers and there is also need of respondent No.7 as lecturer being competent and efficient. further it is added there is no discrimination done with the appellant. . Moreover according Section-10 of the Civil Servant Act 1973 the appellant is bound to serve anywhere in Province

It is, therefore, most humbly prayed that the appeal in hand may be dismissed with cost through out merit less and devoid of any legal footing.

  
**Respondent No.4**  
Principal Saira khatoon

Through:

  
**(M. ASIF YOUSAFZAI)**  
ADVOCATE SUPREME COURT.

  
**SYED NOMAN ALI BUKHARI**  
ADVOCATE HIGH COURT

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

  
**SHAHKAR KHAN YOUSAFZAI**  
ADVOCATE PESHAWAR.

**AFFIDAVIT**

It is affirmed and declared that the contents of reply are true and correct to the best of my knowledge and belief.

  
DEPONENT

OFFICE OF THE PRINCIPAL  
GGDC ALIZAI KURRAM AGENCY

NO 398

DATE: 12/01/2017

To,

The Dy Director Colleges  
FATA Secretariat Peshawar

Sub:

Deduction of Salaries

Memo:

Please refer to your Memo No: 3505 Dated 17/8/2016.

In this connection it is submitted that Miss Bibi Hajira Lecturer & Miss  
Dilkhushad Lecturer are absent from their duties till the closing of Institution i.e. up to 22/12/2016.

In height of that their salaries have been stopped on Source 2 form (Copies  
attached for ready reference).

So you are requested that the undersigned may kindly be guided to proceed  
further in the matter please.

Principal  
GGDC Alizai  
Lower Kurram Agency

Serial No 399-405 dated 12/01/2017  
Copy to the:

1. Agency Account Officer Kurram Agency
2. PS to Social Sector FATA
3. PS to Secretary AI & C Department FATA
4. Political Agent Kurram Agency
5. Assistant Political Agent Lower Kurram Agency
6. PA to Director Education FATA

Principal  
Govt: Girls Degree  
College Ali Zai





NO 8860-61 DATED 27/5/2016

To

The Principal GDC Sadda Lower Kurram Agency  
 The Principal GGDC Alizai Lower Kurram Agency

Subject: DISCIPLINARY ACTION AGAINST ABSENT STAFF

I am directed to refer to Section Officer (C-III) letter NoFS/SO(C-III)/1-10-(Vol-11)/2015/968-70 dated 18-5-2016 and to request you to take disciplinary action against the following teaching and non-teaching absent staff who were found absent from duty during surprise visit of Political Agent Kurram Agency under intimation to this office.

S #	School Name	Name of Absent Staff	Duration/Remarks
1	Govt. Degree Colleg Sadda	Umer Gul	
		Raiz Ullah	
		Hazrat Hussain	
		Rab Nawaz	
		Bakht Zamin	
		Ijaz Rahim	
		Siraj Ul Arafin	
		AShiraz Khan	
		Muhammad Ayaz	
		Ayaz Khan	
		Asmat Ullah	
		Hamid Rehman	
		Muhammad	
		Saqin	
		Ahmad Shah	
2	Govt. Degree Colleg Alizai	Miss Hameed Bibi Lec: Economics ✓	
		Miss Dil Khushad Lec: Maths ✓	
		Miss Asma Lab: Asstt: ✓	Absent since long

Encls: No. 8860-65

Assistant Director (M&E)

Copy to:

- 1- Section Officer (C-III) Al&C Social Sectors FATA Secretariat.
- 2- Political Agent Kurram Agency.
- 3- PS to Secretary Social Sectors FATA.
- 4- PA to Director Education FATA.

Assistant Director (M&E)

Secretary (A&C) FATA

D.No. 1693

27/5/16

Political Agent Kurram

No. 8505  
 Date Recd. In 17/8 2016

The Principal  
 M.A. A. Zai Kurram Agency

Subject: Remuneration of Teachers

Consequent upon the recommendation of Inquiry officer and approval of the competent authority, the salaries of the following teaching staff of the college may be deducted for the period noted against each.

Name and Designation of absent officer	Period
<del>Mr. A. A. Khan Lecturer in Economics B-1/A</del>	<del>1 Month</del>
Mr. Dilshad regular lecturer in Maths B-1/	1 Month

*[Signature]*  
 Deputy Director Colleges

Undated  
 Copy to file dated 2016

- 1. Agency Account Officer Kurram at Parachinar.
- 2. PS to Secretary Social Sectors FATA.
- 3. PS to Secretary AICA Department FATA.
- 4. PS to Director Education FATA.

*[Signature]*  
 Deputy Director Colleges

No. 15070  
Date Pesh: the 17/11 2016

FATA

To: The Principal  
GGDC Ali Zai Kurram Agency

Subject: Deduction of Salaries

Memo: I am directed to refer to this office letter NO.8505 dated 17-08-2016 on the subject cited above with the remarks that the requisite recoveries salaries of the defaulters teaching staff is still awaited at your end while the High ups are pressing hard for the same.

It is further added that the Political Agent concerned may be approached with the request to take security measures to avoid threats to the life and honor of the staff of the college.

*18/11/2016*  
Deputy Director Colleges

Ends No: dated 2016  
Copy to the:

1. Political Agent Kurram Agency with the request to take necessary security measures to avoid threats to the life and honor of the staff of the college please.
2. PA to Director Education FATA.

Deputy Director Colleges



FATA SECRETARIAT  
DIRECTORATE OF EDUCATION  
KHYBER PAKHTUNKHWA, WARSAK ROAD PESHAWAR, PAKISTAN  
PHONE: 091-9210166 FAX 091-9210216

NO

61970

DATED

30/12/16.

To

GDC Sadda Lower Kurram Agency

~~GDC Aliza Lower Kurram Agency~~

Subject:

**DISCIPLINARY ACTION AGAINST ABSENT STAFF**

I am directed to refer to this office letter No. 8560-61 dated 27-05-2016 and Political Agent Kurram Agency letter No.3329-33/PAK/St-DVR date 31-3-2014 (Copies Attached) on the subject cited above and to state that replies in the instant cases are still awaited from your end.

Therefore, You are, requested to convey the action taken against the defaulters alongwith documentary proof within 07 days for onward submission to the quarter concerned, please.

Assistant Director (M&E)

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

Copy to:

- 1- PS to Secretary Social Sectors FATA.
- 2- Section Officer (C-III) letter No.FS/SO(C-III)/1-10(Vol-II)/20152861-63 Dated 17/11/2016.
- 3- PA to Director Education FATA.

Assistant Director (M&E)

*Reman*  
*23-2-2017*  
*M*

SINGLE EMPLOYEE ENTRY

OFFICE OF THE

FOR THE MONTH OF

~~XXXXXXXXXXXXXXXXXXXX~~

12, 2016

DDO CODE

K M 0 0 9 4

Personal Number

0 0 6 6 7 9 2 8

Employee Name

~~XXXXXXXXXXXXXXXXXXXX~~

National ID

Card Number

21300-9400000

495  
21-12-16

Grade (Pay) Scale (Group)

1 7

Salary Status Start Stop

GENERAL DATA CHANGE

Inf Type	Field ID	New Contents	Wage Type	Amount Rupees	Paise	Adj	Effective Date	Remarks
		<del>XXXXXXXXXXXXXXXXXXXX</del>	Pay	5001				<del>XXXXXXXXXXXXXXXXXXXX</del>
		<del>XXXXXXXXXXXXXXXXXXXX</del>	HRA	1000				<del>XXXXXXXXXXXXXXXXXXXX</del>
		<del>XXXXXXXXXXXXXXXXXXXX</del>	Cov.A	1210				<del>XXXXXXXXXXXXXXXXXXXX</del>
		<del>XXXXXXXXXXXXXXXXXXXX</del>	Medical	1300				<del>XXXXXXXXXXXXXXXXXXXX</del>
		<del>XXXXXXXXXXXXXXXXXXXX</del>	Charge All	1505				<del>XXXXXXXXXXXXXXXXXXXX</del>
		<del>XXXXXXXXXXXXXXXXXXXX</del>	Dress:All	1515				<del>XXXXXXXXXXXXXXXXXXXX</del>
		<del>XXXXXXXXXXXXXXXXXXXX</del>	UAA	1523				<del>XXXXXXXXXXXXXXXXXXXX</del>
		<del>XXXXXXXXXXXXXXXXXXXX</del>	Washing All	1557				<del>XXXXXXXXXXXXXXXXXXXX</del>
		<del>XXXXXXXXXXXXXXXXXXXX</del>	Integrd:Allow	1633				<del>XXXXXXXXXXXXXXXXXXXX</del>
		<del>XXXXXXXXXXXXXXXXXXXX</del>	Med:16 to 22	1947				<del>XXXXXXXXXXXXXXXXXXXX</del>
		<del>XXXXXXXXXXXXXXXXXXXX</del>	AR 50% 2010	1945				<del>XXXXXXXXXXXXXXXXXXXX</del>
		<del>XXXXXXXXXXXXXXXXXXXX</del>	ARA-15% 2011	1970				<del>XXXXXXXXXXXXXXXXXXXX</del>
		<del>XXXXXXXXXXXXXXXXXXXX</del>	ARA-20% 2012	2118				<del>XXXXXXXXXXXXXXXXXXXX</del>
		<del>XXXXXXXXXXXXXXXXXXXX</del>	ARA-15% 2013	2143				<del>XXXXXXXXXXXXXXXXXXXX</del>
		<del>XXXXXXXXXXXXXXXXXXXX</del>	ARA-10% 2014	2174				<del>XXXXXXXXXXXXXXXXXXXX</del>
		<del>XXXXXXXXXXXXXXXXXXXX</del>	ARA-10% 2015	2199				<del>XXXXXXXXXXXXXXXXXXXX</del>
		<del>XXXXXXXXXXXXXXXXXXXX</del>	Adjustment of Pay for					<del>XXXXXXXXXXXXXXXXXXXX</del>
		<del>XXXXXXXXXXXXXXXXXXXX</del>	Pay	5601		+		5087-GPF Rs.
		<del>XXXXXXXXXXXXXXXXXXXX</del>	HRA	5002		+		
		<del>XXXXXXXXXXXXXXXXXXXX</del>	Cov.A	5011		+		6138-EEF Rs.
		<del>XXXXXXXXXXXXXXXXXXXX</del>	Medical	5012		+		
		<del>XXXXXXXXXXXXXXXXXXXX</del>	Charge All	5022		+		6153-B.F Rs.
		<del>XXXXXXXXXXXXXXXXXXXX</del>	Dress:All	5025		+		
		<del>XXXXXXXXXXXXXXXXXXXX</del>	UAA	5102		+		6154-GIS Rs.
		<del>XXXXXXXXXXXXXXXXXXXX</del>	Washing All	5670		+		
		<del>XXXXXXXXXXXXXXXXXXXX</del>	Integrd:Allow			+		6155-AR&G Rs.
		<del>XXXXXXXXXXXXXXXXXXXX</del>	Med:16 to 22	5012		+		I.Tax
		<del>XXXXXXXXXXXXXXXXXXXX</del>	AR 50% 2010	5598		+		Total D/d
		<del>XXXXXXXXXXXXXXXXXXXX</del>	ARA-15% 2011	5911		+		
		<del>XXXXXXXXXXXXXXXXXXXX</del>	ARA-20% 2012	5938		+		
		<del>XXXXXXXXXXXXXXXXXXXX</del>	ARA-15% 2013	5311		+		
		<del>XXXXXXXXXXXXXXXXXXXX</del>	ARA-10% 2014	5950		+		
		<del>XXXXXXXXXXXXXXXXXXXX</del>	ARA-10% 2015	5954		+		
		<del>XXXXXXXXXXXXXXXXXXXX</del>	Total					

DEDUCTION

3301	GPF	Rs.
3391	EEF	Rs.
3701	B.F	Rs.
3704	G.Ins	Rs.
3711	Add:G.Ins	Rs.
	I.Tax	Rs.
Total		Rs.

DEDUCTION ADJUSTMENT

5087	GPF	Rs.
6138	EEF	Rs.
6153	B.F	Rs.
6154	GIS	Rs.
6155	AR&G	Rs.
	I.Tax	
	Total D/d	

Prepared By

Audited/Checked by

Signed/Verified by

*[Signature]*  
K. S. ARORA

FINDINGS OF THE INQUIRY COMMITTEE

Explanations produced by the teaching and non-teaching staff are satisfactory except the below mentioned:

1. Bibi Nojra is irresponsible and reckless.
2. Dilkhushad is not willing to perform her duties and has remained absent again for two months March, April 2016.
3. Miss Asma Gul is abroad without proper leave.
4. Mr. Laifullah, junior clerk is rarely coming to college as he resides in Peshawar.
5. Miss Noreen Huma has already been transferred from Govt. Girls Degree College Allai.

RECOMMENDATIONS.

To put the entire enquiry in a nutshell the following recommendations need to be carried out so that the college run smoothly and precious time of the students is not wasted.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

2. Strict disciplinary action be immediately initiated against Miss Asma Gul, Laboratory Assistant as for the last six months she has been remaining absent on baseless pretexts/excuses. Allegedly she is abroad (outside the country) it makes her performance at college ridiculous and thus provides an extremely bad precedent for other staff members. Recovery of at least SIX MONTHS from her salary may be ensured to put a good precedent for other staff members.

Miss Dilkhushad, lecturer in Maths, may be transferred to another college as she is unwilling to be serving at her present station of duty. Moreover at least ONE MONTH salary be deducted/withdrawn from her as punishment as she has joined examination duty without prior permission from her principal thus putting a bad precedent for other employees.

Prof. Tasbin Ullah  
Enquiry Officer in the subject enquiry

No. 28 Prin/GGDC/Sadda

Dated 28-04-2017

To

The Director of Education,

FATA Peshawar.

Subject: UNDUE INTERFARANCE OF MST HAJIRA LECTURER IN HOME ECONOMICS IN COLLEGE ADMINISTRATION

Memo

It is submitted for your kind information that Mst Hajira lecturer in Home Economics who has recently been transferred from GGDC Ali Zai Kurram Agency is a constant headache for the undersigned because she pokes her nose in all the affairs of the college. She wants to reside in the college with her husband which is totally an unfair demand because GGDC Sadda Kurram Agency is a functional college where 253 girls have been enrolled. She can live with her children in a bachelor hostel where other teachers have been stationed but her husband can't be allowed in the premises of the college. The undersigned tried her level best to make her understand but in vain.

It is further submitted that the lecturer concerned instigates the adhoc lecturers and reminds them that the undersigned has stopped their salaries.

Sir, you are well aware that the salaries of the adhoc lecturers were stopped by the directorate reference letter No 15931-64 Dated 5/12/2016. Besides when she was serving at GGDC Ali Zai' she was always at loggerhead with the principal. Two enquiries were conducted against her and recovery was done from her due absentee.

One adhoc lecturer named Sajeela Bibi and one lab assistant named Yaseen Jamala also want to reside with their families with in college jurisdiction. They also instigated them to pressurize the undersigned.

R/Sir, I tried my level best to make her understand but she turned a deaf ear to my councils and advices. She can be accommodated in bachelor hostel but impossible that her husband will also live with her inside the college premises. It will create a lot of problems for the college administration. Another point with I would to stress is that she is very aggressive and creates a lot of disturbance and noise in the college just to create pressure. If she does not mend her ways, I may be allowed to relieve her with the instructions to report to the directorate for adjustment in any other college of FATA.

  
Principal GGDC Sadda

Lower Kurram,  
Govt: Girls Degree College,  
Sadda Kurram Agency

GGDC Sadda Kurram Agency

OFFICE OF THE PRINCIPAL GOVT GIRLS DEGREE COLLEGE SADDA  
Pr/GGDC/Sadda No. 155 Dated 07-08-2017

To

The Director of Education  
FATA Peshawar.

Subject: UNDUE INTERFERENCE/INEFFICIENCY OF MST HAJRA BIBI LECTURER IN HOME  
ECONOMICS IN COLLEGE ADMINISTRATION.


Respected Sir,

It is humbly submitted that Mst: Hajra Bibi who was transferred to this college from GGDC Alizai is a source of constant unrest and a great hurdle in the smooth running of the college since her arrival. She is very much particular about her rights but doesn't accept responsibilities. She claims that she is the daughter of the soil and has every right to do whatever she likes. Her pressing demand is that she may be provided furnished accommodation where she could live with her husband and kids. For this purpose staff hostel is there and she can be provided accommodation where she can reside with her kids but not with her husband because other staff members also live in the same hostel. An enquiry was conducted by Directorate of Education FATA Peshawar in that regard wherein it was directed to allot a room to her in the staff hostel. Room No. 07 has been allotted to her in the staff hostel where she could live with her kids but not with her husband.

Mention must be made of the fact that she is very vulgar, unsocial and doesn't know how to behave herself properly. She kicks the door of the office with foot and creates a lot of disturbance by making noise and taking pictures in the office. She claims that she has been sent here to tease and compel the undersigned on resignation. Besides, she abused the undersigned in the presence of class-IV and leveled immoral and baseless charges. It is pertinent to mention that few enquiries were conducted against her when she was at GGDC Alizai and was given penalty because she was irresponsible and addicted to habitual absenteeism.

R/Sir,

Ours is an under staffed college and we have other issues as well. In this regard, you are requested to transfer the services of the said lecturer to other college because there is no single student of Home Economics at GGDC Sadda and disciplinary action may be initiated against her to bring her to the book please.

  
Principal  
GGDC Sadda Kurram Agency  
Govt: Girls Degree College  
Sadda Kurram Agency

Copy to:

1. Additional Chief Secretary FATA Peshawar.
2. Secretary of Education.
3. Political Agent Parachinar Kurram Agency
4. Assistant Political Agent Sadda Lowe Kurram
5. Agency Education Officer Parachinar at Kurram

Principal  
GGDC Sadda Kurram Agency



OFFICE OF THE PRINCIPAL GOVT: GIRLS DEGREE COLLEGE SADDA KURRAM AGENCY  
PrI/GGDC/Sadda No. 142 Dated 03/08/017

To  
The Assistant Political Agent  
Lower Kurram Sadda


Subject: DETAILS REGARDING THE REQUEST OF MST: HAJRA BIBI FOR  
ACCOMODATION IN THE COLLEGE PREMISES WITH HER HUSBAND.

Memo:

Kindly refer to your office letter No. 2010 APALK Dated 12/07/2017 on the above cited subject. It is stated that Mst: Hajra Bibi Lecturer in Home Economics wants to reside in the college with her husband which is totally an unfair demand because GGDC Sadda Kurram Agency is a functional college where 253 girls have been enrolled. She can live with her children in a bachelor hostel where other lecturers have been stationed but her husband can't be allowed in the premises of the college.

Recently an enquiry has been conducted against Hajira Bibi. The enquiry committee comprising Deputy Director and Assistant Director to allot a room in the hostel wherein she could live with her children but without her husband as other teachers are also living in the same hostel.

Moreover Sadda is a sensitive area if she is allowed to live in the bachelor hostel with her husband it will create a lot of problems for the college administration because there is no such precedent in the college history.

  
Principal

Govt: Girls Degree College Sadda

PRINCIPAL

Govt: Girls Degree College  
Sadda Kurram Agency

OFFICE OF THE PRINCIPAL GOVT GIRLS DEGREE COLLEGE SADDA  
Pri/GGDC/Sadda No. 155 Dated 07/08/2017

To

The Director of Education  
FATA Peshawar.

Subject: UNDUE INTERFERENCE/INEFFICIENCY OF MST HAJRA BIBI LECTURER IN HOME  
ECONOMICS IN COLLEGE ADMINISTRATION.

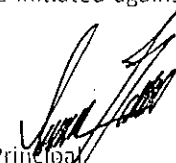
Respected Sir,

It is humbly submitted that Mst: Hajra Bibi who was transferred to this college from GGDC Alizai is a source of constant unrest and a great hurdle in the smooth running of the college since her arrival. She is very much particular about her rights but doesn't accept responsibilities. She claims that she is the daughter of the soil and has every right to do whatever she likes. Her pressing demand is that she may be provided furnished accommodation where she could live with her husband and kids. For this purpose staff hostel is there and she can be provided accommodation where she can reside with her kids but not with her husband because other staff members also live in the same hostel. An enquiry was conducted by Directorate of Education FATA Peshawar in that regard wherein it was directed to allot a room to her in the staff hostel. Room No. 07 has been allotted to her in the staff hostel where she could live with her kids but not with her husband.

Mention must be made of the fact that she is very vulgar, unsocial and doesn't know how to behave herself properly. She kicks the door of the office with foot and creates a lot of disturbance by making noise and taking pictures in the office. She claims that she has been sent here to tease and compel the undersigned on resignation. Besides, she abused the undersigned in the presence of class-IV and leveled immoral and baseless charges. It is pertinent to mention that few enquiries were conducted against her when she was at GGDC Alizai and was given penalty because she was irresponsible and addicted to habitual absenteeism.

R/Sir,

Ours is an under staffed college and we have other issues as well. In this regard, you are requested to transfer the services of the said lecturer to other college because there is no single student of Home Economics at GGDC Sadda and disciplinary action may be initiated against her to bring her to the book please.

  
Principal  
GGDC Sadda Kurram Agency  
Govt. Girls Degree College  
Sadda Kurram Agency

Copy to:

1. Additional Chief Secretary FATA Peshawar.
2. Secretary of Education.
3. Political Agent Parachinar Kurram Agency
4. Assistant Political Agent Sadda Lower Kurram
5. Agency Education Officer Parachinar at Kurram

Principal  
GGDC Sadda Kurram Agency

OFFICE OF THE PRINCIPAL GOVT: GIRLS DEGREE COLLEGE SADDA  
PrI/GGDC/Sadda No. 150-54 Dated 07-08-2017

To

Mst: Hajra Bibi  
Lecturer in Home Economics GGDC Sadda

Subject: EXPLANATION.

You are informed that you are habitual of exchanging hot words with the undersigned and every one in the college. When you entered the office you often misbehaved with the undersigned and taking pictures in office. You are not interested in official duty and leave the college without any prior permission of the undersigned.

The undersigned warned you verbally again and again but you did not change your behaviour.

The undersigned tried her level best to make you understand but you turned deaf ear to my council and advices.

If you do not mend your way the undersigned will send your report to high authority and disciplinary action will be taken against you under E & D rules 1973 and 2001.

Your written reply in this office shall be reached to the undersigned within 3 days of the issue of this letter.

  
Principal

Govt: Girls Degree College Sadda

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

Copy to:

1. Director of Education FATA
2. Political Agent Parachinar.
3. Assistant Political Agent Sadda

  
Principal

Govt: Girls Degree College Sadda

PrI/GGDC/Sadda No. \_\_\_\_\_  
Dated \_\_\_\_\_

OFFICE OF THE PRINCIPAL GOVT: GIRLS DEGREE COLLEGE SADDA  
Pri/GGDC/Sadda No. 144-46 Dated 07/08/2017

OFFICE ORDER.


As per Inquiry Report, conducted by Mr. Azad Khan Deputy Director (F/A) and Mst: Dr Rukhsana Aziz Assistant Director (M & I) D.E FATA vide Endst: No. 11861 Dated 19/07/2017.

Accordingly Mst: Hajra Bibi Lecturer in Home Economics is allotted Room No. 07 in the hostel to live with her children to remove her financial difficulties while coming from Dogar to GGDC Sadda.

Principal  
GGDC Sadda Kurram Agency

Copy to:

1. Director of Education FATA Peshawar.
2. Mst: Hajra Bibi Lecturer in Home Economics

  
Principal  
GGDC Sadda Kurram Agency  
Govt. Girls Degree College  
Sadda Kurram Agency

OFFICE OF THE PRINCIPAL GOVT GIRLS DEGREE COLLEGE SADDA

Pri/ GGDC/Sadda No. 155-60 Dated 07/08/2017

To

The Director Education

FATA Peshawar.

Subject: UNDUE INTERFERENCE/INEFFICIENCY OF MST HAJRA BIBI LECTURER IN HOME ECONOMICS IN COLLEGE ADMINISTRATION.


Respected Sir,

It is humbly submitted that Mst Hajra Bibi who was transferred to this college from GGDC Alizai is a source of constant unrest and a great hurdle in the smooth running of the college since her arrival. She is very much particular about her rights but doesn't accept responsibilities. She claims that she is the daughter of the soil and has every right to do whatever she likes. Her pressing demand is that she may be provided furnished accommodation where she could live with her husband and kids. For this purpose staff hostel is there and she can be provided accommodation where she can reside with her kids but not with her husband because other staff members also live in the same hostel. An enquiry was conducted by Directorate of Education FATA Peshawar in that regard wherein it was directed to allot a room to her in the staff hostel. Room no 7 has been allotted to her in the staff hostel where she could live with her kids but not with her husband.

Mention must be made of the fact that she is very vulgar, unsocial and doesn't know how to behave herself properly. She kicks the door of the office with foot and creates a lot of disturbance by making noise and taking pictures in the office. She claims that she has been sent here to tease and compel the undersigned on resignation. Besides, she abused the undersigned in the presence of class-IV and leveled immoral and baseless charges. It is pertinent to mention that few enquiries were conducted against her when she was at GGDC Alizai and was given penalty because she was irresponsible and addicted to habitual absenteeism.


R/Sir,

Ours is an under staffed college and we have other issues as well. In this regard, you are requested to transfer the services of the said lecturer to other college because there is no single student of Home Economics at GGDC Sadda and disciplinary action may be initiated against her to bring her to the book please.

  
Principal  
GGDC Sadda Lower Kurram  
Sadda Kurram Agency

Copy to the:

1. Additional Chief Secretary FATA Peshawar
2. Secretary of Education
3. Political Agent Kurram at Parachinar
4. Assistant Political Agent Lower Kurram
5. Agency Education Officer of Parachinar

  
Principal  
GGDC Sadda Lower Kurram.

OFFICE OF THE PRINCIPAL GOVT: GIRLS DEGREE COLLEGE SADDA  
PrI/GGDC/Sadda No. 164-67 Dated 15/08/2017

To

Mst: Hajra Bibi  
Lecturer in Home Economics GGDC Sadda

Subject: EXPLANATION. (2<sup>nd</sup>)

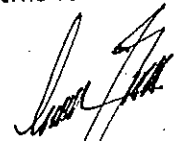
You were informed vide this office Letter No. 150-54 Dated 07/08/2017 that you are habitual of exchanging hot words with the undersigned and every one in the college. When you entered the office you often misbehaved with the undersigned and taking pictures in office. You are not interested in official duty and leave the college without any prior permission of the undersigned.

The undersigned warned you verbally again and again but you did not change your behaviour.

The undersigned tried her level best to make you understand but you turned deaf ear to my council and advices.

If you do not mend your way the undersigned will send your report to high authority and disciplinary action will be taken against you under E & D rules 1973 and 2001.

You are again informed that your written reply in this office shall be reached to the undersigned within 3 days of the issue of this letter.

  
Principal

GGDC Sadda Kurram Agency  
Govt. Girls Degree College  
Sadda Kurram Agency

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

Copy to:

1. Director of Education FATA Peshawar.
2. Political Agent Parachinar.
3. Assistant Political Agent Sadda

Principal  
GGDC Sadda Kurram Agency

OFFICE OF THE PRINCIPAL GOVT: GIRLS DEGREE COLLEGE SADDA

Pri/GGDC/Sadda No. 195-97 Dated 12/10/2017

To

The Director of Education  
FATA Peshawar.

Subject: ABSENT REPORT/TAKING NECESSARY ACTION

Memo:

It is stated that one Mrs. Hajra is working as a Lecturer in Home Economics at GGDC Sadda since 10/04/2017 from the debut to this institution. She did not perform her duty heartedly and remain absent from college without any reason/prior permission of the undersigned. She usually comes to college at 10: AM or 10:30 AM on her concurrency.

In addition to, there is no single student is enrolled in the subject of Home Economics at this college. Other staff members of the college taught various subject to the students but she was directed again and again to teach choice subjects to any class but she turn a deaf ear to my instructions. She was also informed that there is no casual leave in your credit but she did not come to college regularly.

It further added that she remained absent from the college w.e.f 1<sup>st</sup> to 3<sup>rd</sup> and 31 August 2017 (04 days) and w.e.f 05 September to 12 Sep (08 days), 5 October to 11 October (7 days) totally 19 days. She reached from Peshawar on 12:30 PM and forcefully put her signatures in the attendance register.

In this regard it is requested in the best interest of the student and smooth running of the college. Keeping in view the facts and initiate disciplinary action against the lecturer concerned under E & D rules 1973,2001.


  
Principal

Govt: Girls Degree College Sadda

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

Copy forwarded to:

1. Secretary of Education FATA Peshawar.
2. Political Agent Kurram at Parachinar.

  
Principal

Govt: Girls Degree College Sadda

OFFICE OF THE PRINCIPAL GOVT GIRLS DEGREE COLLEGE SADDA  
PrI/GGDC/Sadda No. 246-48 Dated 20/11/2017


To  
The Director of Education  
FATA Peshawar.

Subject: ACTION AGAINST HAJRA BIBI LECTURER IN HOME ECONOMICS

Memo:

It is brought into your kind notice that Mst: Hajra Bibi Lecturer in Home Economics at Govt: Girls Degree College Sadda. She comes to college late after 10:00 AM everyday. There is no enrollment in the subject of Home Economics. She did not take interest in the matters of the college due to non-interest in the college matter and also non involvement of the students in the subject of Home Economics. She stands surplus hence it is requested that the services of the lecturer concerned is not required to this institution.

It is therefore requested that non enrollment in the subject of Home Economics and non interested in the college matters, the lecturer concerned may be transferred to other college for the best interest of students of the college.


  
Principal

Govt: Girls Degree College Sadda  
Govt: Girls Degree College  
Sadda Kurram Agency

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

Copy to:

1. Secretary of Education FATA Peshawar.
2. Political Agent Parachinar Kurram Agency

  
Principal

Govt: Girls Degree College Sadda  
Govt: Girls Degree College  
Sadda Kurram Agency



DIRECTORATE OF EDUCATION FATA SECRETARIAT  
WARSAK ROAD PESHAWAR PAKISTAN

PHONE NO. 091-9210166 FAX: 9210216

NO. 19037 / dated: / 2017

27/10

FATA

To

The Principal ✓  
GGDC Sadda Kurram Agency


Subject: Absent Report / Taking Necessary action

Memo:

I am directed to refer to your letter No. 195 dated 12-10-2017 on the subject cited above.

The Competent Authority is pleased to allow the deduction from salaries of Mst. Bibi Hajira regular lecturer (BS-17) in Home Economics of your college for her willful absence from her official duties for the period given below as under, and deposit into Govt. Treasury on challan and the original challan to thereof be sent to this Directorate for record please.


S. No	Absent Period
1	w.e.f 01-08-2017 to 03-08-2017 (03 days)
2	w.e.f 31-08-2017 (01 day)
3	w.e.f 05-09-2017 to 12-09-2017 (08 days)
4	w.e.f 05-10-2017 to 11-10-2017 (07 days)

  
Deputy Director Colleges

Encl: No. / dated 2017

Copy forwarded to:-

1. Agency Account Officer Kurram Agency at Parachinar.
2. PA to Director Education FATA.

  
Deputy Director Colleges

OFFICE OF THE PRINCIPAL GOVT GIRLS DEGREE COLLEGE SADDA  
Pr/GGDC/Sadda No. 254 Dated 07-12-2017


To  
The Agency Accounts Officer  
Parachinar.

Subject: Deduction of Pay.

Memo:

Kindly refer to the subject noted above and reference to the Directorate of Education FATA letter No. 19037 dated 27/11/2017 enclosed herewith. As the competent authority allowed to deduct the pay of Mst: Hajira Lecturer in Home Economics at GGDC Sadda due to absence from the official duty in the college. Her monthly pay/salary is transferable to her account in the bank. So it is not possible for the undersigned to get the amount cash in hand from the concerned officer.

Therefore kindly deduct the pay as the source-2 is submitted to deduct 19 days pay in the upcoming month.

  
Principal  
Govt: Girls Degree College Sadda  
PRINCIPAL  
Govt: Girls Degree College  
Sadda Kurram Agency

OFFICE OF THE PRINCIPAL GOVT: GIRLS DEGREE COLLEGE SADDA  
PrI/GGDC/Sadda No. 258-61 Dated 18-12-2017


To

Mst: Hajra Bibi  
Lecturer in Home Economics GGDC Sadda

Subject: EXPLANATION. (3rd)

You have already been warned vide this office letter No. 150-54 Dated 07/08/2017 and 164-67 Dated 15/08/2017 respectively, but you have not changed your view till to date. When you entered the office your attitude with the principal is not satisfactory and taking pictures from the attendance register in the Principal office. You are still not keen interested in official duty. You are finally warned that if you have not changed your view disciplinary action will be taken against E and D rules 1973, 2001.

You are lastly informed that your written reply in this office shall be reached to the undersigned with in 3 days of the issue of this letter.

  
Principal

GGDC Sadda Kurram Agency  
Govt: Girls Degree College  
Sadda Kurram Agency

No. \_\_\_\_\_ Dated \_\_\_\_\_  
Copy to:

1. Director of Education FATA Peshawar.
2. Political Agent Parachinar.
3. Assistant Political Agent Sadda

Principal  
GGDC Sadda Kurram Agency

OFFICE OF THE PRINCIPAL GOVT GIRLS DEGREE COLLEGE SADDA  
PrI/GGDC/Sadda No. 262-64 Dated 18/12/2017

Reminder


To  
The Director of Education  
FATA Peshawar.

Subject: ACTION AGAINST HAJRA BIBI LECTURER IN HOME ECONOMICS

Memo:

Reference this memo No. 246-48 Dated 20/11/2017. It is once again requested that Mst: Hajra Bibi Lecturer in Home Economics at Govt: Girls Degree College Sadda. She comes to college late after 10:00 AM everyday. There is no enrollment in the subject of Home Economics. She did not take interest in the matters of the college due to non-interest in the college matter and also non involvement of the students in the subject of Home Economics. She stands surplus hence it is requested that the services of the lecturer concerned is not required to this institution.

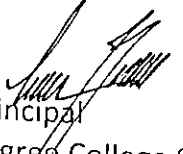
It is therefore requested that non enrollment in the subject of Home Economics and non interested in the college matters, the lecturer concerned may be transferred to other college for the best interest of students of the college.

  
Principal  
PRINCIPAL  
Govt: Girls Degree College Sadda  
Govt: Girls Degree College  
Sadda Kurram Agency

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

Copy to:

1. Secretary of Education FATA Peshawar.
2. Political Agent Parachinar Kurram Agency

o/c  
  
Principal  
Govt: Girls Degree College Sadda  
PRINCIPAL  
Govt: Girls Degree College  
Sadda Kurram Agency

OFFICE OF THE PRINCIPAL GOVT: GIRLS DEGREE COLLEGE SADDA KURRAM AGENCY  
Pri/GGDC/Sadda No-272-73 Dated: 28/12/2017

To

The Director of Education

FATA Peshawar.

Subject: TRANSFER OF MISS HAJRA BIBI LECTURER IN HOME ECONOMICS ON MISBEHAVIOUR


Memo

It is humbly submitted that Mst: Hajra Bibi has been working as a lecturer in Home Economics at GGDC Sadda since 10/04/2017. From the debut to this institution, she is a constant source of unrest and a great hurdle in the smooth running of the college. She did not perform her duty and daily comes to college either at 10:30 AM or 11:30 AM on her concurrency.

Mention must be made of the fact that she is very vulgar unsocial and does not know how to behave herself properly. She kicks the door of the office with foot and creates a lot of disturbance by making noise. She takes pictures in the office without getting the consult of the undersigned. She abused the undersigned and leveled immoral and baseless charges. She claims that she is the daughter of the soil and has every right to do whatever she likes. In addition, there is no single student enrolled in the subject of Home Economics of this college. Other staff members of the college taught various subjects to the students. But she was directed again and again to teach choice subjects to any class but she turn a deaf ear to my instructions. She is of the opinion that she belongs to influential family and none can take action against her. She often threatened the undersigned through her family members that she might be exempted from performing regular duty at college. She claims that she has been sent here to tease and compel the undersigned on resignation.

It is pertinent to mentions that she is addicted to habitual absenteeism since her appointment at GGDC Alizai. It is also important to note that few enquiries were conducted against her when she was at GGDC Alizai and she was given penalty. The lecturer concern is a teacher of Home Economics. A single student has not taken this subject.

In this regard you are requested to transfer the services of the said lecturer to other college and initiate disciplinary action against the lecturer concerned under E & D rules 1973, 2001.


  
Principal

Govt: Girls Degree College Sadda  
Govt: FATA Peshawar  
Sadda, Kurram Agency

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

Copy to:

1. Additional Chief Secretary FATA Peshawar
2. Secretary of Education
3. Political Agent Parachinar Kurram Agency

  
Principal

Govt: Girls Degree College Sadda  
Govt: FATA Peshawar  
Sadda, Kurram Agency



DIRECTORATE OF EDUCATION FATA SECRETARIAT  
WARSAK ROAD PESHAWAR PAKISTAN  
PHONE NO. 091-9210166 FAX: 9210216  
NO. / / Dated: / / 2017

**WARNING:**

It has been reported that you Mst. Bibi Hajira, regular lecturer in Home Economics (BS-17) GGDC Sadda Kurram Agency is creating anrest hurdle in the smooth running of the college despite that the Principal concerned has warned you accordingly.

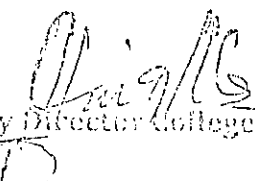
You are hereby strictly warned to mends your ways, otherwise you would be proceeded under disciplinary rules.

(Hashim Khan Afridi)  
Director Education FATA

14190-83  
Encl: No. dated 14/8/2017

Copy forwarded to:-

1. Principal GGDC Sadda Kurram Agency
2. Mst. Bibi Hajira, Ireturer in Home Economics GGDC Sadda Kurram.
3. PS to Secretary SSD FATA Secretariat.
4. PA to Director Education FATA, local Directorate.

  
Deputy Director Colleges



DIRECTORATE OF EDUCATION FATA SECRETARIAT  
WARSAK ROAD PESHAWAR PAKISTAN  
PHONE NO. 091-9210166 FAX: 9210216  
NO. / . Dated : / 2017

**WARNING:**

It has been reported that you Mst. Bibi Hajira, regular lecture in Home Economics ( BS-17) GGDC Sadda Kurram Agency is creating unrest hurdle in the smooth running of the college despite that the Principal concerned has warned you accordingly.


You are hereby strictly warned to mend your ways, otherwise you would be proceeded under disciplinary rules.

(Hashim Khan Afridi)  
Director Education FATA

14190-93  
Endst: No. dated 14/9/2017

Copy forwarded to:-

1. Principal GGDC Sadda Kurram Agency
2. Mst. Bibi Hajira, Ircturer in Home Economics GGDC Sadda Kurram.
3. PS to Secretary SSD FATA Secretariat.
4. PA to Director Education FATA, local Directorate.

  
Deputy Director Colleges

OFFICE OF THE PRINCIPAL GOVT: GIRLS DEGREE COLLEGE SADDA KURRAM AGENCY  
Pri/GGDC/Sadda No ~~26-07~~ Dated ~~23/01/2018~~

REMINDER 1

To

The Director of Education

FATA Peshawar.

Subject: TRANSFER OF MISS HAJRA BIBI LECTURER IN HOME ECONOMICS ON MISBEHAVIOUR

Memo


Reference this office letter No 270-73 dated 28/12/2017 on the above cited subject.

It is once again requested that Mst: Hajra Bibi has been working as a lecturer in Home Economics at GGDC Sadda since 10/04/2017. From the debut to this institution, she is a constant source of unrest and a great hurdle in the smooth running of the college. She did not perform her duty and daily comes to college either at 10:30 AM or 11:30 AM on her concurrency.

Mention must be made of the fact that she is very vulgar unsocial and does not know how to behave herself properly. She kicks the door of the office with foot and creates a lot of disturbance by making noise. She takes pictures in the office without getting the consult of the undersigned. She abused the undersigned and leveled immoral and baseless charges. She claims that she is the daughter of the soil and has every right to do whatever she likes. In addition, there is no single student enrolled in the subject of Home Economics of this college. Other staff members of the college taught various subjects to the students. But she was directed again and again to teach choice subjects to any class but she turn a deaf ear to my instructions. She is of the opinion that she belongs to influential family and none can take action against her. She often threatened the undersigned through her family members that she might be exempted from performing regular duty at college. She claims that she has been sent here to tease and compel the undersigned on resignation.

It is pertinent to mentions that she is addicted to habitual absenteeism since her appointment at GGDC Alizai. It is also important to note that few enquiries were conducted against her when she was at GGDC Alizai and she was given penalty. The lecturer concern is a teacher of Home Economics. A single student has not taken this subject.


In this regard you are requested to transfer the services of the said lecturer to other college and initiate disciplinary action against the lecturer concerned under E & D rules 1973, 2001.

  
Principal  
Govt: Girls Degree College Sadda

No. \_\_\_\_\_ Dated: \_\_\_\_\_

Copy to:

1. Additional Chief Secretary FATA Peshawar
2. Secretary of Education
3. Political Agent Parachinar Kurram Agency

  
Principal  
Govt: Girls Degree College Sadda





OFFICE OF THE PRINCIPAL

Govt Girls Degree College Sadda Kurram dist

No. 115-18 / Dated 06/06/2018

To

Director of Education Tribal Areas  
Peshawar.


Subject: Services of Mst: Hajira Bibi Lecturer in Home Economics are no longer required at GGDC Sadda Kurram District.

Memo:

Mst: Hajira Bibi Lecturer in Home Economics creates trouble for the administration for GGDC Sadda as she was warned vide letter No.14190-93 Dated 14/09/2017 but she did not mend her ways even 19 days salary was also deducted from her on account of her willful absence.

It is to be stated that she is very vulgar, unsocial and doesn't know how to behave herself properly. She creates a lot of disturbance by making noise and taking pictures in the office. She attends the college at 10:30 am or often at 11:00 am on her concurrency which sets a bad precedent for other staff members. A big issue and hurdle in the smooth running of the college is due to the fact that the said lecturer creates frustration and often threatened the undersigned. She is still involved to compel the Principal to take legal action against her. The lecturer concerned is a teacher of Home Economics. A single student has not taken this subject.

In this regard it is requested that the services of her to this college is no more required and she is absolutely surplus because of the above facts and descriptions she may be transferred to other college to avoid frustration in future.


  
Principal

Govt: Girls Degree College  
Sadda Kurram District

No. \_\_\_\_\_ Dated \_\_\_\_\_ 2018

Copy to the:

1. Additional Chief Secretary Tribal Area Peshawar.
2. Secretary of Education Tribal Area Peshawar.
3. Deputy Commissioner Parachinar Kurram Dist.

  
Principal

Govt: Girls Degree College  
Sadda Kurram District

OFFICE OF THE PRINCIPAL  
Govt: Girls Degree College  
Sadda Kurram Agency.

No. 94-97/Dated 09/07/2018

To

Director of Education FATA  
Peshawar.

Subject: Services of Miss Hajira Bibi Lecturer in Home Economics are no longer requires at GGDC Sadda Kurram Agency.

Memo:

Mst: Hajira Bibi Lecturer in Home Economics create trouble for the administration for GGDC Sadda as she was warned vide letter No.14190-93 Dated 14/09/2017 but she did not mend her ways even 19 days salary was also deducted from her on account of her willful absence.

Now she attends the college at 10:30 am or often at 11:00 am, which sets a bad precedent for other staff members. A big issue and hurdle in the smooth running of the college is due to the fact that the said lecturer creates frustration and often threatened the undersigned. She is still involved to compel the Principal to take legal action against her. Over and above there is no student in her subject as such she is absolutely surplus.

Hence, she is not only surplus at the college but also creates administrative issues at the college. It is therefore requested to transfer her from this college as her services are no longer required to us.


  
Principal

Govt: Girls Degree College  
Sadda Kurram Agency  
Govt: Girls Degree College  
Sadda Kurram Agency

No. \_\_\_\_\_ Dated \_\_\_\_\_ 2018.

Copy to the:

1. Additional Chief Secretary FATA Peshawar.
2. Secretary of Education FATA Peshawar.
3. Political Agent Parachinar Kurram Agency.

  
Principal

Govt: Girls Degree College  
Sadda Kurram Agency  
Govt: Girls Degree College  
Sadda Kurram Agency

OFFICE OF THE PRINCIPAL  
Govt: Girls Degree College Sadda Kurram  
No. 158 Dated 03/09/2018.

To

The Director of Education  
Tribal Areas Peshawar.

Subject: TRANSFER OF MRS: HAJIRA BIBI LECTURER IN HOME ECONOMICS

Memo:

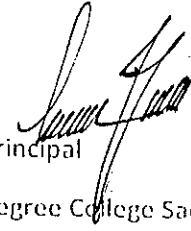
The undersigned has already requested to your good self that Mrs Hajra bibi lecturer in Home Economics does not perform her duty and create uphill problems for the college administration.

A plethora of explanations have been called of her but all of them fell on her deaf ear. She does not mend her ways and sets bad precedent to her counter parts as they might also follow the suit.

She is still kicking the door of the office with foot and creates a lot of disturbance by making noise. She did not perform her duty and daily comes to college either at 11:00 AM and 11:20 AM respectively. She leveled immoral and baseless charges against the undersigned.

She neither mends her ways nor shows any sort of obedience; hence her further stay at the college is not in the interest of students. As her presence at the college leads to overall academic disturbance.

It is therefore requested to kindly get her transferred from this college and adjust her somewhere else enabling us to run the institution in the most befitting way.

  
Principal

Govt: Girls Degree College Sadda  
Tribal District Kurram,

No. \_\_\_\_\_ Dated \_\_\_\_\_ 2018.

Copy to:

1. Secretary of Education Tribal Areas Peshawar.

Principal

Govt: Girls Degree College Sadda  
Tribal District Kurram

OFFICE OF THE PRINCIPAL  
Govt: Girls Degree College Sadda Kurram  
No. 158-59 Dated 3/09/2018.

To

The Director of Education  
Tribal Areas Peshawar.

Subject: TRANSFER OF MRS: HAJIRA BIBI LECTURER IN HOME ECONOMICS

Memo:

The undersigned has already requested to your good self that Mrs Hajra bibi lecturer in Home Economics does not perform her duty and create uphill problems for the college administration.

A plethora of explanations have been called of her but all of them fell on her deaf ear. She does not mend her ways and sets bad precedent to her counter parts as they might also follow the suit.

She is still kicking the door of the office with foot and creates a lot of disturbance by making noise. She did not perform her duty and daily comes to college either at 11:00 AM and 11:20 AM respectively. She leveled immoral and baseless charges against the undersigned.

She neither mends her ways nor shows any sort of obedience; hence her further stay at the college is not in the interest of students. As her presence at the college leads to overall academic disturbance.

It is therefore requested to kindly get her transferred from this college and adjust her somewhere else enabling us to run the institution in the most befitting way.


  
Principal

Govt: Girls Degree College Sadda  
Tribal District Kurram

No. \_\_\_\_\_ Dated \_\_\_\_\_ 2018.

Copy to:

1. Secretary of Education Tribal Areas Peshawar.

  
Principal

Govt: Girls Degree College Sadda  
Tribal District Kurram

OFFICE OF THE PRINCIPAL  
Govt: Girls Degree College Sadda Kurram  
No. 83-84 dated 28/9/2018.

To

The Director of Education  
Tribal Areas Peshawar.

**Subject: TRANSFER OF MRS: HAJIRA BIBI LECTURER IN HOME ECONOMICS**

Memo:

The undersigned has already requested to your good self that Mrs Hajira bibi lecturer in Home Economics does not perform her duty and create uphill problems for the college administration.

A plethora of explanations have been called of her but all of them fell on her deaf ear. She does not mend her ways and sets bad precedent to her counter parts as they might also follow the suit.

She did not perform her duty and daily comes to college according to her own sweet will. Her time of coming to the college is either at 11:00 AM and 11:20 AM respectively.

A time table was issued and all the teaching staff members were instructed to take periods according to the schedule in the time table. The issued time table was torn from the notice board and classes in the college by the above said lecturer and the ministerial member of the college was ordered to re-schedule the circulated time table according to her own will and choice without obeying the instructions of the Principal. Similarly other staff members of this college are harassed in different ways to favor her which can lead to frustrate the normal situation of this college. A written statement of the said staff of the college is enclosed herewith.

She neither mends her ways nor shows any sort of obedience; hence her further stay at the college is not in the interest of students. As her presence at the college leads to overall academic disturbance.

Despite the several written and verbal warnings no change is seen in her respective attitude and behavior, rather she is creating more problems without any reason for the management, even she misbehaved with teaching staff of this college as per reports. Furthermore she is trying to pollute the peaceful environment of the college which cannot be further tolerated.

Keeping in view her negative unchangeable attitude and non tolerable misbehavior her services are to be transferred to some where else to avoid frustration and smooth running of the college.

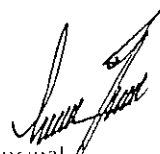
It is therefore requested to kindly get her transferred from this college and adjust her somewhere else enabling us to run the institution in the most befitting way.

Principal  
Govt: Girls Degree College Sadda  
Tribal District Kurram

No. 83-84 Dated \_\_\_\_\_ 2018.

Copy to:

1. Secretary of Education Tribal Areas Peshawar.

  
Principal  
Govt: Girls Degree College Sadda  
Tribal District Kurram

OFFICE OF THE PRINCIPAL  
Govt: Girls Degree College Sadda Kurram  
No. 76 Dated 10-9-2018.

To  
The Director of Education  
Tribal Areas Peshawar.

Subject: TRANSFER OF MRS: HAJIRA BIBI LECTURER IN HOME ECONOMICS

Memo:

The undersigned has already requested to your good self that Mrs Hajra bibi lecturer in Home Economics does not perform her duty and create uphill problems for the college administration.

A plethora of explanations have been called of her but all of them fell on her deaf ear. She does not mend her ways and sets bad precedent to her counter parts as they might also follow the suit.

She did not perform her duty and daily comes to college according to her own sweet will. Her time of coming to the college is either at 11:00 AM and 11:20 AM respectively.

A time table was issued and all the teaching staff members were instructed to take periods according to the schedule in the time table. The issued time table was torn from the notice board and classes in the college by the above said lecturer and the ministerial member of the college was ordered to re-schedule the circulated time table according to her own will and choice without obeying the instructions of the Principal. Similarly other staff members of this college are harassed in different ways to favor her which can lead to frustrate the normal situation of this college. A written statement of the said staff of the college is enclosed herewith.

She neither mends her ways nor shows any sort of obedience; hence her further stay at the college is not in the interest of students. As her presence at the college leads to overall academic disturbance.

Despite the several written and verbal warnings no change is seen in her respective attitude and behavior, rather she is creating more problems without any reason for the management, even she misbehaved with teaching staff of this college as per reports. Furthermore she is trying to pollute the peaceful environment of the college which cannot be further tolerated.

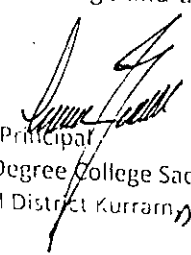
Keeping in view her negative unchangeable attitude and non tolerable misbehavior her services are to be transferred to some where else to avoid frustration and smooth running of the college.

It is therefore requested to kindly get her transferred from this college and adjust her somewhere else enabling us to run the institution in the most befitting way.

No. \_\_\_\_\_ Dated \_\_\_\_\_ 2018.

Copy to:

1. Secretary of Education Tribal Areas Peshawar.

  
Principal  
Govt: Girls Degree College Sadda  
Tribal District Kurram

Principal  
Govt: Girls Degree College Sadda  
Tribal District Kurram

OFFICE OF THE PRINCIPAL  
Govt: Girls Degree College Sadda Kurram  
No. 76 Dated 10-9 2018.

To

The Director of Education  
Tribal Areas Peshawar.

Subject: TRANSFER OF MRS: HAJIRA BIBI LECTURER IN HOME ECONOMICS

Memo:

The undersigned has already requested to your good self that Mrs Hajra bibi lecturer in Home Economics does not perform her duty and create uphill problems for the college administration.

A plethora of explanations have been called of her but all of them fell on her deaf ear. She does not mend her ways and sets bad precedent to her counter parts as they might also follow the suit.

She did not perform her duty and daily comes to college according to her own sweat will. Her time of coming to the college is either at 11:00 AM and 11:20 AM respectively.

A time table was issued and all the teaching staff members were instructed to take periods according to the schedule in the time table. The issued time table was torn from the notice board and classes in the college by the above said lecturer and the ministerial member of the college was ordered to re-schedule the circulated time table according to her own will and choice without obeying the instructions of the Principal. Similarly other staff members of this college are harassed in different ways to favor her which can lead to frustrate the normal situation of this college. A written statement of the said staff of the college is enclosed herewith.

She neither mends her ways nor shows any sort of obedience; hence her further stay at the college is not in the interest of students. As her presence at the college leads to overall academic disturbance.

Despite the several written and verbal warnings no change is seen in her respective attitude and behavior, rather she is creating more problems without any reason for the management, even she misbehaved with teaching staff of this college as per reports. Furthermore she is trying to pollute the peaceful environment of the college which cannot be further tolerated.

Keeping in view her negative unchangeable attitude and non tolerable misbehavior her services are to be transferred to some where else to avoid frustration and smooth running of the college.

It is therefore requested to kindly get her transferred from this college and adjust her somewhere else, enabling us to run the institution in the most befitting way.

Principal

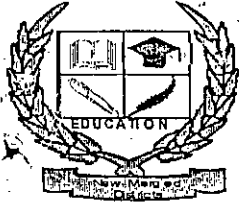
Govt: Girls Degree College Sadda  
Tribal District Kurram

No. \_\_\_\_\_ Dated \_\_\_\_\_ 2018.

Copy to:

1. Secretary of Education Tribal Areas Peshawar.

Principal  
Govt: Girls Degree College Sadda  
Tribal District Kurram



DIRECTORATE OF EDUCATION NEW MERGED DISTRICTS  
WARSAK ROAD PESHAWAR  
PHONE NO. 091-9210166 FAX: 9210216

NO. 12065, dated: 25/9 2018


To

The Principal  
GGDC Sadda New Tribal  
District Kurram

**Subject: IMPLEMENTATION ON RECOMMENDATION BY INQUIRY COMMITTEE**

Memo:

I am directed to refer to the subject cited above and to enclose herewith the inquiry report submitted by the inquiry committee and to ask you to implement Para-I and Para-II at your end under intimation to the office of under signed please.


  
Deputy Director Colleges

Endst No: \_\_\_\_\_ Dated \_\_\_\_\_ /2018

25/9/18

Copy forwarded for information to the:

1. PA to Director Education New Tribal Districts.

  
Deputy Director Colleges



## INQUIRY REPORT.

1. INTRODUCTION. The Incharge Principal of GGDC Sadda Kurram Agency under reported Mst: Bibi Hajira a lecturer of Home Economics of the College for late coming to duty, frustration creator, rude behavior and a source of unrest in the college. The Principal also requested the Director of Education FATA to transfer the services of the said lecturer to any other college and initiate disciplinary action against her under E&D rules 2001(F/A).

The Directorate of Education FATA ordered to probe the matter through an inquiry committee and notified the following officers to conduct an impartial inquiry vide No. 6011-15 dated 26/4/2018 for submitting report (I/B).

- i. Muhammad Nawaz Assistant Director (Estab).
- ii. Rehmat Khan Assistant Director (SNE).

2. MECHANISM. The member of the inquiry Committee visited GGDC Kurram Agency on dated 11.5.2018. The teaching staff and non-teaching staff were present in the college. The College was functional as usual. A number of female students were present in the college compound. The Committee members approached Principal office and discussed the longstanding issue relates to Mst: Hajira. The Principal concerned reiterated the same stand mentioned in her complaints submitted to Director Education FATA previously (vide I/B). The Committee had a joint meeting with teaching staff and put few queries before them (F/C). At last Mst: Hajira also appeared before the Inquiry committee and shared her views and requested that she does have accommodation problem. According to her statement, she comes to college for duty from Dogar village which is lying at a distance of 45 KM. She requested for accommodation in premises of college to live alongwith her husband but there is not separate parda wall for each residential quarter. The same nature letter has also been received by the Principal from Kurram Political Union (I/B) requesting therein to reject the request of lecturer concerned on the plea that she may not be allowed to live with her spouse within the college due to the parda of their female students.

### 3. FINDINGS.

The Following findings are conducted:-

i. The main issue is that of the accommodation of the concerned lecturer states time and again that she has been accommodated in the uncle of her husband house in Dogar village. The distance from the residence to the duty station is far away nearly 45 KM with no regular traffic. It seems difficult for her to perform her duty well in time.

(ii.) During the construction time and scope of the residential quarters, the executing Agency i.e. the C&W Building Deptt; ignored the social aspect of parda system for family quarters and hence created a problem.

iii. It is pertinent to mention here, that being a girls college no single students of Home Economic has been enrolled in this very college so far. ⑦

4. Recommendations.

The following points are recommended for solution of the issue.

- i. The Principal may be directed to allot room to Mst: Hajira Bibi in the Hostel to remove her difficulties while coming from Dogar to Sadda station but without her spouse as the FATA female students belong to the tribal families and mostly they are veild women, hence living with spouse inside the premises of Girls College would be against the regional traditions and customs.
- ii. Moreover, all those male who are mature/adults and are not college employees but living with their families may also be expelled from college premises.
- iii. The political administration may be approached by AEO office to reflect and bring a residential scheme in upcoming ADP to construct family quarters and banglows for female teaching staff so that to resolve the issue for ever.
- (TAD) iv. On short term basis, parda wall may be constructed either from college funds or from M&R (Agency funds) and PA authority may be approached for this purpose, and thereafter the existed quarter/banglows may be allotted to the staff on priority basis as per rules.
- v. The post of Principal may be filled with permanent Principal or with any experienced Professor in order to run the college without any difficulties and problems in future.

Inquiry Officers

*Rehmat*

1. Rehmat Khan AD (SNE),  
Directorate of Education FATA.

*Muhammad Nawaz*  
2. Muhammad Nawaz,  
Assistant Director (Estab;)  
Directorate of Education FATA

OFFICE OF THE PRINCIPAL  
Govt: Girls Degree College Sadda Kurram  
No. 82-74 Dated 24/9/2018.

REMINDER-1

To  
The Director of Education  
Tribal Areas Peshawar.

Subject: TRANSFER OF MRS: HAJIRA BIBI LECTURER IN HOME ECONOMICS

Memo:

The undersigned has already requested to your good self that Mrs Hajra bibi lecturer in Home Economics does not perform her duty and create uphill problems for the college administration.

A plethora of explanations have been called of her but all of them fell on her deaf ear. She does not mend her ways and sets bad precedent to her counter parts as they might also follow the suit.

She did not perform her duty and daily comes to college according to her own sweet will. Her time of coming to the college is either at 11:00 AM and 11:20 AM respectively.

A time table was issued and all the teaching staff members were instructed to take periods according to the schedule in the time table. The issued time table was torn from the notice board and classes in the college by the above said lecturer and the ministerial member of the college was ordered to re-schedule the circulated time table according to her own will and choice without obeying the instructions of the Principal. Similarly other staff members of this college are harassed in different ways to favor her which can lead to frustrate the normal situation of this college. A written statement of the said staff of the college is enclosed herewith.

She neither mends her ways nor shows any sort of obedience; hence her further stay at the college is not in the interest of students. As her presence at the college leads to overall academic disturbance.

Despite the several written and verbal warnings no change is seen in her respective attitude and behavior, rather she is creating more problems without any reason for the management, even she misbehaved with teaching staff of this college as per reports. Furthermore she is trying to pollute the peaceful environment of the college which cannot be further tolerated.

Keeping in view her negative unchangeable attitude and non tolerable misbehavior her services are to be transferred to some where else to avoid frustration and smooth running of the college.

It is therefore requested to kindly get her transferred from this college and adjust her somewhere else enabling us to run the institution in the most befitting way.

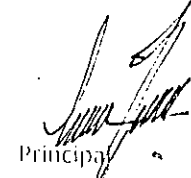


Principal  
Govt: Girls Degree College Sadda  
Tribal District Kurram

No. \_\_\_\_\_ Dated \_\_\_\_\_ 2018.

Copy to:

- 1. Secretary of Education Tribal Areas Peshawar.



Principal  
Govt: Girls Degree College Sadda  
Tribal District Kurram

OFFICE OF THE PRINCIPAL  
Govt: Girls Degree College Sadda Kurram  
No. 17-26 Dated 18-10-2018.

To :  
The Director of Education  
Tribal Areas Peshawar.


Subject: TRANSFER OF MRS: HAJIRA BIBI LECTURER IN HOME ECONOMICS

Memo:

Kindly refer to the above noted subject. It is stated that Mrs. Hajira Bibi lecturer in Home Economics was instructed to attend the period of Islamiyat Class 4<sup>th</sup> Year according to her own will and choice, but she did not take interest in students. She again refused to do so and is still violating the rules and regulations. She is not taking the period since 25/09/2018. Today on 18<sup>th</sup> of September 2018 she came to the college after 12:00 PM and affixed signature in the attendance register forcefully without obeying the clear instructions. (copy attached) She is using her own sweet will without obeying the rules. She is just a burden for the college administration. The undersigned continuously informed your good office of the activities of the concerned lecturer.

She neither mends her ways nor shows any sort of obedience; hence her further stay at the college is not in the interest of students. She is still using harsh words and is trying to make the conditions worse for the undersigned. Her aggressive attitude cannot be tolerated furthermore. As her presence at the college leads to overall academic disturbance.

It is therefore requested to kindly get her transferred from this college and adjust her somewhere else enabling us to run the institution in the most befitting way.

  
Principal

Govt: Girls Degree College Sadda  
Tribal District Kurram

No. \_\_\_\_\_ Dated \_\_\_\_\_ 2018.

Copy to:

1. Secretary of Education Tribal Areas Peshawar.

  
Principal

Govt: Girls Degree College Sadda  
Tribal District Kurram

OFFICE OF THE PRINCIPAL  
GGDC SADDA KURRAM.

No. 141 Dated 26/10/18

To

Director Education  
New Tribal Districts Peshawar.

Subject: IMPLEMENTATION ON RECOMMENDATION BY INQUIRY COMMITTEE

Memo:

Reference your office letter No. 12065 dated 25/09/2018 on the above cited subject. It is stated that as per your directions to implement Para-I and Para-II according to the recommendation of inquiry committee. The Para-I has been implemented; the concerned lecturer has been already allotted a room at GGDC Sadda Kurram. She is allowed to stay with her children but without her husband/family members.

The Para-II has been implemented as the Residential Quarters has been allotted to the employees of GGDC Sadda. The residential Quarters are allotted only to the official of this college.

  
Principal

GGDC Sadda Kurram

Reminder 1

To  
The secretary of Social Welfare Department  
Newly merged Districts Peshawar.

Subject: Creation of Law & Order situation and mudslinging through baseless Newspaper statement  
And other sources by using the name of chieftains by Mrs. Bibi Hajira Lec: in Home Economics.

Memo:

Kindly refer to vide this office letter No. 132-39 Dated 26/10/2018 on the above noted subject. It is to remind you for your kind information that Mrs. Bibi Hajira Lecturer in Home Economics has been transferred from GGDC Abzai to GGDC Sadda. From first day of taking over charge she has spared no efforts to create law & order problems to college administration by demanding to allot Principal Bungalow.

It is being in your kind notice that she wants to reside in Principal Bungalow with her family members but the tribal culture did not allow to reside male non official in college jurisdiction. Three enquiries has been conducted in this regard by Ex Deputy Director Mr. Azad Khan and Mrs. Rukhsana Aji Deputy Directress, another enquiry by Mr. Laq Khan Ex-Deputy Director Colleges, and the third enquiry by Mr. Muhammad Nawaz & Mr. Rehmat Khan Assistant Directors. All the enquiries strictly negated the allotment of bungalow.


Respected Sir,  
The said lecturer in reaction along with her husband trying to mudsling, the reportation of the college administration through social media and newspaper statements. Recently on the instigation of said lecturer and her husband some baseless charges leveled in the newspaper of Daily Aaj & Khabrain date 22/10/2018.

(1) The first charge was leveled that the in-charge Principal didn't allow any principal transferred to take over charge. In this regard it is stated that no transfer order has been issued from the date taking over charge of the undersigned and it is quite clear from the fact that if someone transferred, then how can refused to hand over charge by negating the order of high ups.

(2) The second baseless charge was leveled that result of F.A/F.Sc for the year 2018 is not satisfactory and not affecting students in B.A/B.Sc. It is being in your kind notice that the Inter result of GGDC Sadda for the year 2018 was 100% and fifty students has been enrolled for the current session in B.A/B.Sc. (The result and enrollment is hereby enclosed)

(3) Names of chieftains in the newspaper Mr. Kasir Khan is the father, & Mr. Habib Ur Rahman is the husband and Khadi Khan is the relative of said lecturer.

It is requested that the said lecturer has no student in the said college and has no class. Further more she is creating law & order situation for college administration which has greatly suffered the smooth function of the college. It is further requested that her adjustment in any other college have enrollment of students in the subject of Home Economics will be in the best interest of community as well as the college.

  
Principal  
GGDC Sadda Kurram

No. \_\_\_\_\_ Dated \_\_\_\_\_ 2018.

Copy forwarded to the:

1. Director of Education (IATA) newly merged Districts.
2. Deputy Commissioner District Kurram at Parachinar.
3. GOC.
4. Commandant Kurram Militia at Parachinar.
5. Colonel 114 Wing Lower Kurram Sadda.
6. Assistant Commissioner Lower Kurram Sadda.
7. District Education Officer at Parachinar.

Principal  
GGDC Sadda Kurram

OFFICE OF THE PRINCIPAL  
GGDC SADDA KURRAM.

No. 195 Dated 06-12-2018

To

The Director of Education  
Newly Merged Tribal Districts  
Peshawar.

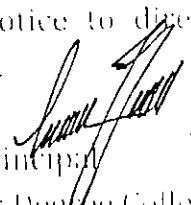
Subject:

IMPLEMENTATION ON RECOMMENDATION BY INQUIRY  
COMMITTEE.

Memo:

Reference Add: District Education Officer Lower & Central Kurram Sadda letter No. 7021-25 Dated 30/11/2018 on the above noted subject. It is stated for your kind information that as per Inquiry Report conducted by Mr. Azad Khan Deputy Director (F/A) and Mst. Dr. Rukhsana Aziz Assistant Director (M&I) D.E FATA vide Endst: No. 11861 Dated 19/07/2017. The directions/instructions were followed on the recommendations of inquiry report to allot room to Mst. Hajra Bibi in the Hostel to remove her difficulties but without her spouse/parents, the Para-I has been implemented; the concerned lecturer has been already allotted a room No. 07 at GGDC Sadda Kurram vide this office order Prin/GGDC/Sadda No. 144-46 Dated 07/08/2017 but she is not willing to reside in the said Hostel without her husband.

The information in this regard has already been brought in your kind notice vide this office letter No. 141 dated 26/10/2018, however the information in this regard is brought again in your notice to direct the concerned to avoid lame excuses of the lecturer concerned.

  
Principal

Govt. Girls Degree College  
Sadda Kurram District

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

Copy to:

1. Deputy Commissioner Kurram at Parachinar.
2. Assistant Commissioner Lower Kurram Sadda.
3. Commandant Kurram Militia 114 wing Sadda.
4. Add: District Education Officer Lower Kurram. With the remarks that being the officials of separate cadre you are not entitle to direct the undersigned. We are the officials of Higher Education Department and are directly responsible to Directorate and other related officers of Directorate.

Minutes of the meeting of Secretary Social Sector department in this regard is enclosed for ready reference vide Para No. 2.

Principal

Govt. Girls Degree College  
Sadda Kurram District

OFFICE OF THE PRINCIPAL

GGDC SADDA KURRAM.

No. \_\_\_\_\_ Dated 14-12-2018

To

The Head of Home Economics  
Department. College of Home Economics  
University of Peshawar.

Subject: Information regarding Mst: Hajra Bibi Regular student of M.Phil

Memo:

It is submitted for your kind information that Mst: Hajra Bibi is absent from her official duty since October 2018 due to the fact that she has taken admission in M.Phil at College of Home Economics University of Peshawar. She has been enrolled without informing the undersigned which is violation of rules.

In this regard it is requested to provide necessary information about enrolment, date of joining the said course and date of admission please.


Principal

Govt: Girls Degree College  
Sadda Kurram District

No.211 Dated

Copy to the:

1. Director of Education Newly Merged Districts Peshawar.
2. Director Higher Education KPK Peshawar.

  
Principal

Govt: Girls Degree College  
Sadda Kurram District





**DIRECTORATE OF HIGHER EDUCATION  
KHYBER PAKHTUNKHWA  
KHYBER ROAD, PESHAWAR**

Tel # 091-9210242 Fax # 091-9210215

[dhekpesh@gmail.com](mailto:dhekpesh@gmail.com) [facebook.com/dhekpeshawar](https://www.facebook.com/dhekpeshawar) [twitter.com/dhekpeshawar1](https://twitter.com/dhekpeshawar1)

No.                      /54-III/Complaint/AD(G)

Dated Peshawar the 26/6 /2019

To

1. The Principal,  
Govt. Degree College Baggar,  
Kurram.
2. Deputy Director(Colleges)  
Merged District Khyber Pakhtunkhwa.

Subject: INQUARY REGARDING GRIEVANCES OF STUDENTS OF GGDC, SADDA.

Respected Sir /Madam, السلام عليكم

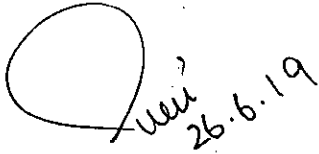
I am directed to refer to the subject noted above and to enclose herewith a self-explanatory application and to state that the Director, Higher Education is pleased to nominate the above mentioned Officers as inquiry committee members to probe into matter and to submit a detailed report within a week to this office for further proceeding into the instant case, please.

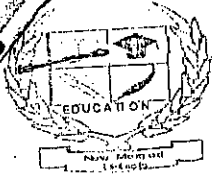
Assistant Director (General)

Endst No. 13322-23

Copy to:

1. PA to Director, Local Directorate.
2. Principal Govt Girls Degree College, Sadda for information.

  
Assistant Director (General)  
Higher Education Department



DIRECTORATE OF EDUCATION MERGED DISTRICTS  
WARSAK ROAD PESHAWAR PAKISTAN  
PHONE NO. 091-9210166 FAX: 9210216

NO. 1635 GGDC Sadda/Vol-II dated: 27/5/2019



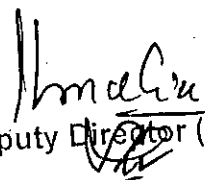
To

The Principal  
GGDC Sadda District Kurram

Subject: GOVT ACCOMMODATION IN THE COLLEGE / HOSTEL

Memo:


I am directed to refer to the subject cited above and to enclose herewith a copy of complaint lodged by one Mst. Bibi Hajira lecturer in Home Economics of your respective college and to ask you to report about accommodation available in the college and occupants therein also intimate the status of the teachers Hostel mentioned in the complaint and explain your position for not providing the same information in spite of repeated directions.

  
Deputy Director (Colleges)

Endst: No. \_\_\_\_\_ / dated \_\_\_\_\_ 2019

Copy forwarded to:

1. PS to Deputy Secretary (Colleges) Higher Education Department Khyber Pakhtunkhwa.
2. PA to Director Higher Education Khyber Pakhtunkhwa.
3. PA to Director Education New Merged Districts.

  
Deputy Director (Colleges)

OFFICE OF THE PRINCIPAL  
GGDC SADDA KURRAM.

No. 05 Dated 15-01-2019

To

The Secretary of Higher Education  
KPK Peshawar.

Subject: ABSENT REPORT

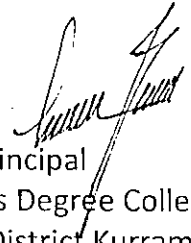
Memo:

Please refer to the above noted subject. It is stated that Mst: Hajra Bibi Lecturer in Home Economics of this college whose wilfully absence and inefficiency creates a lot of problems for the undersigned to run the college efficiently. As already mentioned she is not performing her duties efficiently and honestly. Her habitual absence from this college will further lead the situation to an abnormal position. She sometime comes to college at 10:00 AM or 10:30 AM on her concurrency.

It is further added that she remained absent from the college w.e.f 17/10/2018 to 18/10/2018, on 24/10/2018 to 05/11/2018 (15 days) and w.e.f 22/11/2018 to 29/11/2018.(08 days). She also remained absent on 07/12/2018 to 13/12/2018 (07 days) totally 30 days.

It is further stated that she has been enrolled at College of Home Economics, University of Peshawar for M.Phil. Studies without any proper NOC from the competent authority.

In this regard it is requested to initiate disciplinary action against the lecturer concerned under E & D rules 1973, 2001.

  
Principal

Govt: Girls Degree College  
Sadda District Kurram

OFFICE OF THE PRINCIPAL  
GGDC SADDA KURRAM.

No. 18-20 Dated 14-02-2

Reminder-I

To

The Principal  
College of Home Economics  
Peshawar University.

Subject: Information regarding Mst: Hajra Bibi regular student of M.Phil

Memo:

Reference vide this office letter 210-12 Dated 14/12/2018 on the above noted subject. It is stated that Mst: Hajra Bibi is absent from her official duty since October 2018 due to the fact that she has taken admission in M.Phil at College of Home Economics Peshawar University. She has been enrolled without informing the undersigned which is violation of rules.

In this regard it is requested to provide necessary information about enrollment, date of joining the said course and date of admission please.

Principal

Govt: Girls Degree College

Sadda District Kurram )

No.     Dated    

Copy to the:

1. Director of Education Newly Merged Districts Peshawar.
2. Director Higher Education KPK Peshawar.

Principal

Govt: Girls Degree College

Sadda District Kurram )

OFFICE OF THE PRINCIPAL

GGDC SADDA KURRAM

No. 78-80 Dated 07/05/20

To

The Secretary,  
Higher Education Department,  
Peshawar KPK.

**SUBJECT: SERVICES OF MISS BIBI HAJRA LECTURER IN HOME ECONOMICS ARE NO LONGER REQUIRES AT GGDC SADDA DISTRICT KURRAM.**

R/Sir,

It is respectfully stated that Mst Bibi Hajra is lecturer in Home Economics in this college since 10/04/17. It was expected that she would be a good addition to the teaching staff of the college, but unfortunately she proved to be a constant source of trouble and headache for the whole college. She is aggressive, quarrelsome, unsocial and uses indecent and abuse language with staff and students. She was directed time and again to mend her ways and behave like a teacher, but inspite of all advices she failed to behave well with staff and students. She was warned not to poke her nose in the administrative matters of the college, but she always tried to pollute the peaceful environment of this college.

R/Sir,

When she crossed her limits, explanations were called from her and she was reported to the Directorate of Education FATA with the request to transfer her services to other college, but no action was taken against her. Afterwards the matter was brought in notice of Secretary Social Sector Department FATA and Additional Chief Secretary FATA, but no action was taken against her so far.


It is requested that strict disciplinary action may be initiated against her on the following grounds.

1. She does not obey the rules and regulations of the institution and set a bad practice for other staff members.
2. She usually remained absent, she daily came to college on 10:30 and leave the college on her own sweet will. Whenever she come to college, put signature on attendance register and then throw the register on ground instead of keeping it on the table. This shows the level of her attitude and behavior.
3. She is irresponsible and habitual absentee. Two inquiries were conducted against her at GGDC Alizai due to long absence from duty. As a punishment after inquiry she was given reward by transferring her services to GGDC Sadda, a station of her choice.

4. As mentioned above the Directorate of Education of FATA was informed regarding her misconduct, and no action was taken against her.
5. Again she misconducted and published baseless charges against the institution and the undersigned on 22/10/2018 in Daily Khabrain and Daily Aaj. Giving statement to media was clear violation of E&D rules and gross misconduct.
6. She has been enrolled in college of Home Economics university of Peshawar to get her M.Phil Degree without any permission/ NOC from the undersigned and the competent authorities (Sectary Higher Education). She remain absent from her official duty and busy is in attending M.Phil classes at Home Economics college Peshawar. The undersigned sent her absent report vide this office letter No 209 Dated 13/12/18. But no action was taken against her. Now she again remain absent from her official duty in the month of April.

Moreover there is not even single student enrolled in the subject of Home Economics as she is absolutely surplus. She is not only surplus at college but also create administrative issues at the college.

It is therefore requested to transfer her from this college as her services are no longer required to this institution.

  
Principal

Govt Girls Degree College  
Sadda District Kurram

Copy to the:

1. Director Higher Education Department, Peshawar.
2. Director Education Newly Merged Tribal Areas Warsak Road Peshawar.

  
Principal

Govt Girls Degree College  
Sadda District Kurram

OFFICE ORDER.

A committee of the following lecturers and students of GGDC Sadda is hereby constituted regarding internal inquiry of capturing pictures/making video from students of GGDC Sadda by Mst: Bibi Hajra Lecturer in Home Economics.

1. Miss Shamida Bangash Lecturer in Zoology BPS-17
2. Miss Sabina Naz Lecturer in Geography BPS-17
3. Nooria Sadeem D/O Sadeem Khan student of Class 2<sup>nd</sup> Year
4. Nahida D/O Fazal Mir Student of Class 2<sup>nd</sup> Year.


Principal

Govt: Girls Degree College  
Sadda District Kurram

No. 91-92 Dated 22/05/2019.


Copy to:

1. All the concerned staff/members at GGDC sadda
2. Office file.

  
Principal

Govt: Girls Degree College  
Sadda District Kurram

subject enrolled, but a strict disciplinary action may also be initiated on irresponsible act, so that the parents may not discharge their daughters from college and redress their grievances.

  
Principal

Govt: Girls Degree College  
Sadda District Kurram

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

Copy to the:

1. Director Higher Education Khyber Pakhtunkhwa Peshawar.
2. Director of Education New-Merged Districts Peshawar.
3. Deputy Commissioner at Parachinar.
4. Commandant Kurram Militia 114 wing Sadda.
5. Assistant Commissioner Lower Kurram Sadda.

Principal

Govt: Girls Degree College  
Sadda District Kurram



OFFICE OF THE PRINCIPAL  
GGDC SADDA KURRAM.

No. 95-100 Dated 23/05/2019

To

The Secretary Higher Education  
Khyber Pakhtunkhwa Peshawar.

Subject: CATCHING PICTURES/MAKING VIDEOS OF STUDENTS BY MST: BIBI  
HAJRA LECTURER IN HOME ECONOMICS.

Memo:

Kindly refer to the above cited subject with great reverence that on 22/05/2019 Mst Bibi Hajra Lecturer in Home Economics has caught pictures and was making video. The students rushed to the office and brought the issue in the notice of undersigned. The lecturer concerned was directed to stop such activities but she threw filthy abuses to undersigned and students and refused to stop the same. The students informed their parents and reached the college. They were in anger but the staff members tried their level best to control the situation. The situation was brought in the kind notice of Additional Director Mst: Sabiha Zeb and Deputy Director Colleges Mr. Abdul Malik. The parents and students also convey their grievances to Deputy Director telephonically. They also give satisfaction to parents, students and staff members. Husband of the concerned lecturer reached college and the anger parents were ready to beat him but the situations were controlled and no casualties occurred, and the pictures and videos were deleted by her husband.

It is brought in your kind notice that the lecturer Mst: Bibi Hajra has already been under report as she has created problems from the day of her assuming charge in the college. Her husband has also been involved to create problems for college administration. A plethora of enquiries conducted on the concerned lecturer and she was given penalty.

Being Tribal District parents of female students are not willing to enrolle their daughters, but the constant convincing of the undersigned and staff members compelled them to enrolle their daughter. Such incidents will discourage the parents and will suffer the female enrolment in college. The statement of students, parents and staff members are hereby enclosed for kind perusal.

It is therefore requested that on the basis of previous enquiries and

## RELIEVING CHIT

The services of Mst: BIBI HAJRA Lecturer in Home Economics BPS-17. is no longer required to this institution and is hereby relieved from duty on 23/05/2019 regarding her constant unrest, hurdles, unsocial and immoral attitude towards the undersigned, students of GGDC Sadda as well as staff members.


As per request of student parents to relieve her as per issue of making video and capture pictures of students at GGDC Sadda on 22/05/2019

Her service is hereby placed at the disposal of Director Higher Education Khyber Pakhtunkhwa Peshawar, for further posting and initiate disciplinary action against the lecturer concerned under E & D rules 1973, 2001.

Principal  
Govt: Girls Degree College  
Sadda District Kurram

No/03-07 Dated 24/05/2019  
Copy to the

1. Secretary Higher Education Khyber Pakhtunkhwa Peshawar.
2. Director Higher Education at Peshawar.
3. Director Education Newly Merged Districts at Peshawar.
4. Deputy Commissioner at Parachinar District Kurram
5. District Accounts officer Kurram at Parachinar with the request to stop her pay and issue LPC as per source form enclosed.
6. Lecturer concerned.

  
Principal  
Govt: Girls Degree College  
Sadda District Kurram.

OFFICE OF THE PRINCIPAL  
GGDC SADDA KURRAM.

No/11-12 Dated 24/05/2019

To


The Director of Education  
New Merged Districts  
Peshawar.

Subject: RELIEVING CHIT TO MST: BIBI HAJRA LECTURER IN HOME ECONOMICS

Memo:

Kindly refer to the above noted subject. It is stated that Mst Bibi Hajra Lecturer in Home Economics has captured pictures and was making video of students at GGDC Sadda District Kurram. The lecturer concerned was directed to stop such activities but she threw filthy abuses to undersigned and students and refused to stop the same. A detailed report has already been sent vide this office letter No. 95-100 Dated 23/5/2019. It has also been brought in your kind notice that the lecturer Mst Bibi Hajra has already been under report as she has created problems from the day of her assuming charge in the college. It is also important to note that few inquiries were conducted against her when she was at GGDC Alizai and she was given penalty.

Moreover in the past she always created problems for the college administration and did not follow the rules and regulations of college deliberately. That is the reason the concerned lecturer is hereby relieved from duty today on 23/5/2019. (Written statements of parents, staff members and students are hereby enclosed for perusal and ready reference please.)

  
Principal

Govt: Girls Degree College  
Sadda District Kurram,

No. \_\_\_\_\_ Dated \_\_\_\_\_ 2019

Copy to:

1. Director Higher Education Khyber Pakhtunkhwa  
at Peshawar.

Principal

Govt: Girls Degree College  
Sadda District Kurram

## INQUIRY REPORT

### INTRODUCTION:

On 22<sup>nd</sup> of May, 2019, some students/parents submitted a written complaint letter to the Incharge principal GGDC Sadda with the remarks that Mst. Bibi Hajra (Lecturer in Home Economics) of the college had captured their photos and made video while they were busy in taking their practical examination at laboratory. The said unfortunate incident caused severe (Grievances among students/Parents). The Directorate Higher Education Khyber Pakhtunkhwa ordered to probe into the matter through an inquiry officer vide No. 13322-23, dated: 26-05-2019 and notified Mr. RAIS AHMAD JAN BPS-19 Pincipal Govt: Degree College Bagan Lower Kurram as an inquiry officer to conduct an impartial inquiry and redress the "Grievances of students/parents".

### MECHANISM OF INQUIRY:

The inquiry Officer visited personally check the environment of the college. The Principal, Ex. Incharge Principal, teaching, Non teaching staff and student were inquired and concluded as follow:

- 1- The Principal Miss Saira Khatoon BPS-20 was inquired regarding the case. She had already interview all the staff members along with students about the situations. She was of the opinion that the said lecturer is a constant headache for college and the issue of capturing pictures and making video was a serious case. She had committed the said mistake and the credit goes to Incharge Principal Abida Dilnashveen who maintained the law and order situations but the lecturer concerned and his husband has still a serious threat from the arrogant parents of the students.
- 2- The Incharge Principal stated that on 22<sup>nd</sup> May 2019, she was usual present in the office some students of 2<sup>nd</sup> year rushed into her office complaining that Mst: Bibi Hajra ha captured their photos and made video while they were busy in taking their practical examination. The Lab: Attendant also endorsed the allegations of the students. The sa lecturer was at once called to the office taken her mobile from her and deleted the photo and videos on the spot to the threat that it should not get viral on social media. The sa students informed their parents about the incidents and approached college furious n angry. The Incharge Principal added that she tried her level best to satisfy the angry parent and to defuse the situations but students and parents were not ready to compromise their demand to relieve the accused lecturer. An internal Committee was constituted probe into the matter. As per recommendations of the internal Committee, upon the stre demand of students/ parents and looking the gravity of the situations, the said lecturer v relieved on 23<sup>rd</sup> May, 2019 in order to defuse the tense situations. She added that t lecturer concerned is a habitual absentee and very aggressive quarrelsome and unsocial

her behavior with colleagues and students. Number of inquires has been conducted against her in past and deduction of salaries has been made as a token of punishment. Further the said lecturer has been constantly about the accommodation to live in bachelor Hostel with husband and children. The college administration has always directed her to reside with her children in hostel where other staff members has been accommodated but her husband could not be accommodated in hostel but she refused to do so. Moreover the said lecturer has been a constant source of trouble and headache for the college administration due to undue interference in administrative affairs and the concerned quarters have been informed about her time and again.

- 3- In response to the alleged video /pictures scandal, the accused lecturer Mst: Bibi Hajra did confirm that she had captured photos and made video but it was general panoramic video of the college not specific to some girls. She argued that she is a resident of Dogar and requested for accommodation in college premises to live with her husband and children but still she had not been allotted any accommodation. In the same video and scandal issue she has also relieved me which is illegal.
- 4- The students who were present on the spot were also inquired about the alleged video/picture scandal. They were confirming the incident as real and specific.
- 5- The opinion /views of almost all the staff members (teaching and non teaching) were sought. They were reiterating the stance of incharge principal and showing severe reservations about the accused lecturer Mst: Bibi Hajra.

**FINDINGS:**

To put the entire inquiry in a nutshell, the following findings are concluded:

- a- The issue of "capturing pictures and making video" was without any doubt a very serious and threatening incident generally in Girls College. Either the picture video is general or specific, it is unsocial, illegal and annoying.
- b- There was complete study environment and all the allegations /charges leveled by Mst: Bibi Hajra confirmed from the students and staff members were baseless / irrelevant and concerned lecturer did so only to vilify the reputation of institution to get fulfilled personal interests.
- c- The present regular Principal Saira Khatoon BPS-20 has also recommended that the accused lecturer is a constant source of headache for college administration and is problematic which has greatly suffered the smooth functioning of the college.
- d- The Undersigned is also well aware of the behavior and absenteeism when she was posted at Govt: Girls Degree college Alizai. The amount of Rupees 205832/- has been deposited from her on Challan in Govt; exchequer on 17/12/2012 vide challan (Challan copy enclosed)
- e- In 2016 due to absence at GGDC Alizai for two months her pay for the said period was deducted by the Dy: director Colleges No. 8505, dated 17/08/2016.

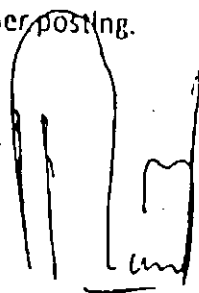
- f- In 2017 salary deducted from her pay vide Deputy Director colleges letter No. 19037, dated 27/11/2017 due to absenteeism. (Copy enclosed)
- g- On the basis of same attitude she has already been warned by Director Higher Education vide No. 14190-93, dated 14/09/2017. (copy enclosed for ready reference)
- h- Above all what is astonishing is that "Home Economics" is a subject specially offered for girls but being a girls college no student has been enrolled in the said subject in this college although lecturer in Home economics is available.

**RECOMMENDATIONS:**

After thorough evaluation of all aspects of inquiry, the following recommendations are hereby proposed in the best interest of the college.

- i- From the above stated findings it is quite clear that the said lecturer is habitual of her reckless attitude and behavior from the very 1st day of her appointment. As Mst: Bibi Hajra (Lecturer in Home Economics) has already been relieved w.e.f 23-05-2019, she may please be adjusted somewhere else in the college having students of her subject as she bears extremely casual attitude towards her duty. Having no students /class she will always be busy in contriving something useless and unnecessary. Transferring her will also give consolation to the students and their parents.
- ii- As the accused lecturer is habitual with such activities, so light punishment like stoppage of increment etc as per law is also recommended that she may not dare like this in any other college of her posting.

Dated- 24/09/2019



INQUIRY OFFICER

RAIS AHMAD JAN (BPS-19)  
PRINCIPAL GDC BAGAN, TRIBAL DISTRICT KURRAM

**GOVT. DEGREE COLLEGE BAGAN, DISTRICT KURRAM**

No. 2657

Dated 26/07/2019

From

The Principal,  
Govt. Degree College Bagan, Tribal District Kurram.

To

The Director of Higher Education,  
Directorate of Higher Education, Khyber Pakhtukhwa, Peshawar.

Subject: INQUIRY REPORT REGARDING THE GRIEVANCES OF STUDENTS OF GGDC SADDA

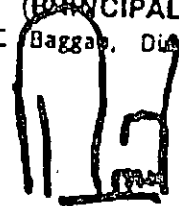
Memo;

Enclosed herewith please find the Inquiry Report in original referring to the subject cited for your kind consideration in response to your letter No. 13322-23, dated 26-06-2019.

Copy for information to:

1. Deputy Director of Higher Education, Peshawar.
2. Office Copy.

(PRINCIPAL)  
GDC Bagan, District Kurram



(PRINCIPAL)  
GDC Bagan, District Kurram

PRINCIPAL  
GDC Bagan  
Tribal District Kurram

MISSION: LET US WORK TOGETHER TO MAKE THE BEST

Website: [www.ijournal.com](http://www.ijournal.com)



To

The Principal,

Govt Postgraduate College,  
Kohat

SUBJECT:

APPEAL FOR COMPENSATION REGARDING MAKING  
SCRATCHES AND DENTS IN MY PERSONAL CAR  
DURING INQUIRY VISIT TO GOVT GIRLS DEGREE  
COLLEGE SADDA KURRAM

Re: Mr.

The undersigned is pleased to inform you that the Director, Higher Education, Khyber Pakhtunkhwa has constituted the undersigned as inquiry officer to conduct a fact finding inquiry in the light of complaint lodged by the Principal GDC Sadda Kurram to the DHE (Copies enclosed).

In this connection, it is brought to your kind notice that the undersigned and his team will visit your college/office on 15.11.2019 to conduct the said inquiry. You are therefore advised to be present on the above mentioned date along with your teaching and non-teaching staff so that factual position of the complainant may be clarified and a report thereof be submitted to the Government within the stipulated time.

Thank you!

(PROF. ZAERULLAH KHAN)

Principal,

Govt Postgraduate College

Kohat

Endst: Even No & Date:

Copy of the above is submitted to the Director Higher Education  
Khyber Pakhtunkhwa.

Principal,



Principal,

Khyber Pakhtunkhwa

Copy of the above mentioned letter to the Federal Education

Ends: Even No. 1/2019

Principal,

Government College, Peshawar

Thank you!

The above mentioned letter is for the info.

position of the recipient may be checked and a report thereof is submitted.

Government College, Peshawar, will be pleased to receive the report.

Report of the recipient may be submitted to the undersigned.

10/11/2019

GOVERNMENT COLLEGE, PESHAWAR

GOVERNMENT COLLEGE, PESHAWAR

GOVERNMENT COLLEGE, PESHAWAR

GOVERNMENT COLLEGE, PESHAWAR

MISSION

To

The Principal

GGDC Sadda District Kurram

Subject: REQUEST FOR RELIEVING/TRANSFER Mst: HAJRA BIBI LECTURER.


It is requested that one Mst: Hajra Bibi Lecturer in Home Economics is constant headache for us and now she has crossed all the limits regarding her behavior.


Firstly she was catching pictures/ making videos at the office but now she started catching pictures and making videos of college's students.

Yesterday on 22/05/2019 what she acted, about which the higher authorities are to be informed immediately. We all are from respected families and being Pathans if our families know about such situation like this, it will lead us to enmity with the said lecturer.

In future if such video or pictures goes viral or uploaded on social media, then who will be responsible for such act.

In this regard we are requesting you to inform the higher authority to take serious action against her and transfer her service from this college but if it is not possible then we are demanding you to transfer our services from here because we are from respected families and we cannot tolerate such unlawful action by Mst: Hajra Bibi lecturer at GGDC Sadda.

  
Principal  
Govt: Girls Degree College  
Sadda Tribal District Kurram

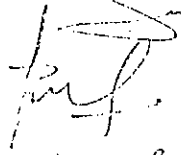
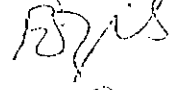
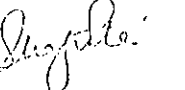
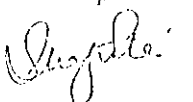
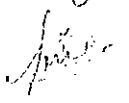
  
Sabina Naz

Zeba Khan

Faris Mahmood

Shagufta Afridi

Uzma MCHARLAN

حضرت جناب پرنسپل صاحبہ گریڈ کالج صمدہ

2011/5/22 کو ہم پرنسپل کے سلسلے میں گورنمنٹ گریڈ کالج صمدہ

کالج آف ایمریٹیم کلاس 2nd year کی طالبات کے لیے ہیں پرنسپل کے دورے کے دوران کالج میں آئیں تاکہ کمرہ جس کا نام میں حلجزہ بی بی ہے لے دو یا سہل نکال کر بیمار کی ویڈیو لے لی اور اسی طرح ہم سے کچھ تصویر لے لی نکل واپس ہم نے منع کیا لیکن اس کے باوجود بھی اس نے یہ غلط حرکت کی

آج صبح سے درخواست کی جاتی ہے کہ مزکورہ نکلے اس کے خلاف سخت کر دینی ہے کی جائے

تو میری بانی ہوگی

طالبات گریڈ کالج صمدہ

Principal  
Govt. Girls Degree College  
Saoda Tribal District Kurram

Nabeela

Tania noor

Yusra

Nooria

Khadija

والدہ  
فضل میر

رحم نور

سلیم خاں

صدیق خاں

مکل احمد

نام  
ناہیدہ ①

تانیہ ②

سیری ③

نوریا ④

ظہیرہ ⑤

محضوب جناب پرنسپل صاحبہ گریز کالج

آپ صاحبہ کی توجہ ہم اس جانب مبذول کروانا  
چاہتے ہیں کہ آج مورخہ 22/05/2019 کو ہمارے کالج  
پرنسپل کے سلیپ میں گریز کالج صدر آئے جو کہ کلاس  
ٹیکنڈا کر میں زیرِ تعلیم ہیں۔

کالج یذا میں آئی لیکچرار صیسی باجرہ جی نے موبائل  
کا غلط استعمال کر کے کالج یذا کی طالبات سے ویڈیو  
کروائی اور تصاویر بھی نکلوائی۔ طالبات نے ہمیں  
وقت پر آگاہ کر دیا۔

سب سے بڑی غلطی متعلقہ لیکچرار نے کی ہے۔

ہم آپ صاحبہ سے مذکورہ لیکچرار کے خلاف سخت قانونی  
کارروائی کی درخواست کرتے ہیں۔ اور اعلیٰ حکام کو بھی  
اس بابت آگاہ کر دینگے۔ اسی لیکچرار کو جلد از جلد Relieve  
کرتے صیہ کو حل کر دے۔ ورنہ تمام ترمیمہ داری کالج پرنسپل پر ہوگی۔  
سرپرست طالبات

Principal  
Govt Girls Degree College  
Sarda Triba District Kurram


- (1) یحیٰی خان
- (2) سدیم خان
- (3) رحیم نور
- (4) فضل میر
- (5) حاجی سلیم خان

خدمت جناب پرنسپل صاحبہ گورنر کالج

بہایت احترام کے ساتھ گزارش کی جاتی ہے  
کہ بحودہ 22/5/2019 کو کالج میں طالبات  
کی اپریٹیکل تھی۔ سینڈ اٹری طالبات آئے  
ہوئے تھے۔ اسی دوران کالج کی ایک لیکچرار  
میں بی بی باجرا نے موبائل کے ذریعے طالبات  
سے ویڈیو کروائی اور رصا و برہلی نکالے  
میں مواقع پر موجود تھی میں نے اور دوسرے  
طالبات نے منع کیا لیکن اس نے انکار کرتے  
رہتی تھی۔

آپ صاحبہ کو بروقت خبر دی تاکہ  
مسلے کو حل کیے۔

انجیر خاتون  
لیٹ اسٹڈنٹ  
گورنر کالج صدرہ

  
Principal  
Govt. Girls Degree College  
Sadda Tribal District Kurrach

NATIONAL BANK OF PAKISTAN PARACHINAR



DATE: 17/12/2012

Received from the bearer, Bibi Hayra bc

The sum of Rs. 205832/-

To be credited to Government account under the head

On account of Revenue

National Bank of Pakistan  
(Government of Punjab)

17 DEC 2012

GOVT RECEIPTS

The portion to be returned to the account

Note: The bank is not to receive monies in the

invoice is card ready filled in

APPROVED  
G.O.P.

OFFICE OF THE PRINCIPAL  
GGDC SADDA KURRAM.

No. 111-12 Dated 24/5/19

To

The Director of Education  
New Merged Districts  
Peshawar.

Subject: RELIEVING CHIT TO MST: BIBI HAJRA LECTURER IN HOME ECONOMICS

Memo:

Kindly refer to the above noted subject. It is stated that Mst Bibi Hajra Lecturer in Home Economics has captured pictures and was making video of students at GGDC Sadda District Kurram. The lecturer concerned was directed to stop such activities but she threw filthy abuses to undersigned and students and refused to stop the same. A detailed report has already been sent vide this office letter No. 95-100 Dated 23/5/2019. It has also been brought in your kind notice that the lecturer Mst Bibi Hajra has already been under report as she has created problems from the day of her assuming charge in the college. It is also important to note that few inquiries were conducted against her when she was at GGDC Alizai and she was given penalty.


Moreover in the past she always created problems for the college administration and did not follow the rules and regulations of college deliberately. That is the reason the concerned lecturer is hereby relieved from duty today on 23/5/2019. (Written statements of parents, staff members and students are hereby enclosed for perusal and ready reference please.)

Principal  
Govt: Girls Degree College  
Sadda District Kurram

No. \_\_\_\_\_ Dated \_\_\_\_\_ 2019

Copy to:

1. Director Higher Education Khyber Pakhtunkhwa at Peshawar.

  
Principal  
Govt: Girls Degree College

①

**BEFORE THE PESHAWAR HIGH COURT, PESHAWAR.**

W.P No:- \_\_\_\_\_/2020

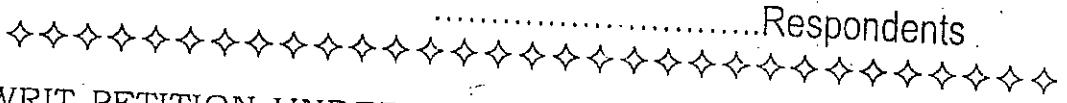
Mst: Bibi Hajira W/o Habib Ur Rehman, lecturer Home economic  
Govt: Girls Degree College, Sadda District Kurram

..... Petitioner

**Versus**

1. Government of Khyber Pakhtunkhwa, through Chief Secretary, Civil Secretariat, Peshawar.
2. Government of Khyber Pakhtunkhwa, through Secretary Higher Education Department, Civil Secretariat, Peshawar.
3. The Director, Directorate of Higher Education, Govt: of Khyber Pakhtunkhwa, Rano Ghari, New Chamkani Chowk, Peshawar.
4. Deputy Director Higher Education, Peshawar.
5. Director Education, newly merged Districts at Peshawar.
6. Accountant General Khyber Pakhtunkhwa, Peshawar Cantt Peshawar.
7. District Accounts Officer, District Kurram at Parachinar
8. Principle Govt: Girls Degree College, Sadda District Kurram.

..... Respondents



WRIT PETITION UNDER ARTICLE 199 OF THE CONSTITUTION  
OF ISLAMIC REPUBLIC OF PAKISTAN, 1973 WITH ALL  
AMENDMENTS UP-TO-DATE.



**PESHAWAR HIGH COURT, PESHAWAR****ORDER SHEET**

Date of order or proceedings 2.	Order or other proceedings with signature of Judge or Magistrate and that of parties or counsel where necessary. 3.
18.03.2020	<p><b><u>WP No.1360-P/2020 with I.R.</u></b></p> <p><b><u>Present:</u></b> Mr. Muhammad Ilyas Orakzai, Advocate, for the petitioner.</p> <p>Syed Sikandar Hayat Shah, AAG along with Professor Abdul Wahab, Director, Ms. Khadija Inayat, Deputy Director Establishment, Mr. Khalid Gul, Superintendent, Directorate of Higher Education, Government of KPK, for the respondents.</p> <p style="text-align: center;">*****</p> <p><b><u>QAISER RASHID KHAN, J.-</u></b> Through the petition in hand, the petitioner has prayed as under :-</p> <ul style="list-style-type: none"> <li>➤ To allow the petitioner to join her duties in compliance of the order dated 24.6.2019 of the respondent No.2.</li> <li>➤ To release the salary w.e.f. 1.6.2019 withheld by the respondents illegally and without lawful justification.</li> <li>➤ To proceed against the respondent No.8 in terms of order passed by the respondent No.2 dated 24.06.2019.</li> <li>➤ To direct the respondents to provide accommodation in the College premises to the petitioner in bungalow already lying vacant.</li> <li>➤ To award compensation for mental torture, illegal exercise of power by the respondent No.8.</li> <li>➤ To award costs of the petition.</li> </ul>

2. On the previous date of hearing keeping in view the grievance of the petitioner, we thought it fit to have the personal attendance of the respondents and that is how Professor Abdul Wahab, Director, Ms. Khadija Inayat, Deputy Director Establishment and Mr. Khalid Gul, Superintendent, Directorate of Higher Education, Government of KPK are before the court.

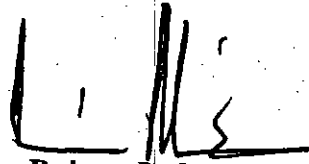
Ms. Khadija Inayat, Deputy Director Establishment, Higher Education Department, Peshawar has come up with an altogether different version with a set of allegations against the petitioner and also states that she has been transferred to the Government Girls Degree College, Thall District Hangu vide notification dated 6.2.2020 (copy placed on file).

3. Since the petitioner has been transferred from the Government Girls Degree College, Sadda (Kurram) to the Government Girls Degree College,

Thall District Hangu, therefore, we cannot proceed in this matter in view of the explicit bar contained in Article 212 of the Constitution of the Islamic Republic of Pakistan, 1973.

4. Accordingly, this petition stands dismissed. The petitioner is, however, at liberty to agitate her grievance against the said order dated 6.2.2020 before the competent forum, if so advised.

**Announced.**  
**Dated: 18.03.2020.**



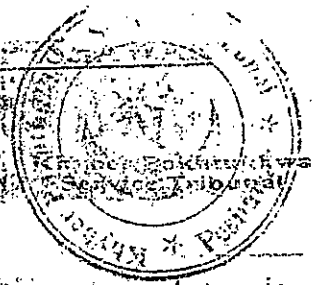
Senior Puisne Judge



Judge

BEFORE THE KPK SERVICE TRIBUNAL

APPEAL NO. 3729/2020



Miss. Abida Dilnasheen, Lecturer (History),  
GGDC Sadda Kurram.

Date: 24/11/2020

(APPELLANT)

VERSUS

1. The Chief Secretary Govt of KP, Civil Secretariat Peshawar.
2. The Secretary Higher Education, Govt of KP, Civil Secretariat Peshawar.
3. The Director Higher Education KP, Rano Ghari, New Chamkani Chowk, Peshawar.

(RESPONDENTS)

ATTESTED  
[Signature]  
Registrar  
KPK Service Tribunal  
Peshawar

APPEAL UNDER SECTION 4 OF THE SERVICE TRIBUNALS ACT 1974 AGAINST THE ORDER DATED 06.02.2020 IN UTTER VIOLATION OF POSTING TRANSFER POLICY AND AGAINST SUPERIOR COURT JUDGMENT AND AGAINST REJECTION ORDER DATED 24.03.2020 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT HAS BEEN IMPLIEDLY REJECTED FOR NO GOOD GROUNDS.

PRAYER:

THAT THE ACCEPTANCE OF THIS APPEAL THE IMPUGNED ORDER DATED 06.02.2020 and 24.03.2020, MAY BE SET ASIDE TO THE EXTENT OF THE APPELLANT BEING PASSED IN A POSTING/TRANSFER POLICY. THE DEPTT: MAY FURTHER PLEASE NOT TO TRANSFER THE APPELLANT IN VIOLATION OF POSTING/TRANSFER POLICY. ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.

Filed to date

Registrar

24/11/2020

Re-submitted and filed

Registrar

25/11/2020



**BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR.**

**Appeal No. 6353/2020**

Miss Bibi Hajra

Vs


Govt of KPK

**APPLICATION FOR DELETION THE NAME OF  
RESPONDENT NO.7 FROM THE OF PANEL OF  
RESPONDENTS.**

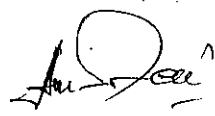
**RESPECTFULLY SHEWETH:**

1. That the appellant has filed the above captioned appeal wherein he has challenged the transferred order dated 06.02.2020 where the appellant was transferred from Sadda Khurram to Tall Hangu.
2. That the order challenged before the Hon'ble Tribunal has no bearing/concern upon the right of respondent no.7. the respondent no.7 was party in the instant appeal only on the basis of personal grudges, to mentally torture the respondent no7.
3. That If the order dated 06.02.2020 is set aside by the tribunal, which will not affected the right of the respondent no.7. further the transfer order of appellant and respondent no.7 is same and issue on the same date does mean that the respondent no.7 make party in the instant appeal in panel of respondent.
4. That the respondent no.7 was only party in this appeal on the basis of personal grudges, to mentally torture the respondent no.7 but nothing else, so the name of respondent No.7 may be deleted from the panel of respondent.

It is most therefore, humbly prayed that on acceptance of this application the respondent no.7 may be erase from the panel of respondents in the instant appeal in interest of justice to save the time of court and respondent no.7. Any other remedy which this Tribunal deems fit and appropriate that may also be awarded in favour of the applicants.

  
Respondent no. 7  
Abida Dilnasheen

Through:

  
(M. ASIF YOUSAFZAI)  
ADVOCATE SUPREME COURT.

SYED NOMAN ALI BUKHARI  
ADVOCATE HIGH COURT

  
(TAIMUR ALI KHAN)  
ADVOCATE HIGH COURT

  
SHAHKAR KHAN YOUSAFZAI  
ADVOCATE PESHAWAR.

**AFFIDAVIT:**

It is affirmed on oath that the contents of application are true and correct and nothing has been concealed form this Honb'le Tribunal.

  
Deponent

**VAKALATNAMA**

NO. \_\_\_\_\_/20

IN THE COURT OF KP Service Tribunal, Peshawar

Bibi Hajra (Appellant)  
(Petitioner)  
(Plaintiff)

VERSUS

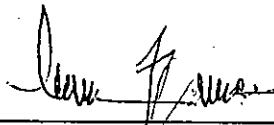
H. Edu Dept (Respondent)  
(Defendant)

I/We, Respondent No 7

Do hereby appoint and constitute **SYED NOMAN ALI BUKHARI Advocate High Court Peshawar**, to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.

I/We authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

Dated \_\_\_\_\_/20


  
(CLIENT)

**ACCEPTED**

  
**M. ASIF YOUSAFZAI**  
ADVOCATE SUPREME COURT

  
**SYED NOMAN ALI BUKHARI**  
Advocate High Court Peshawar.

  
**TAIMUR ALI KHAN**  
Advocate High Court Peshawar

  
**SHAHKAR KHAN YOUSAFZAI**  
ADVOCATE PESHAWAR



BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

APPEAL NO. 3729/2020

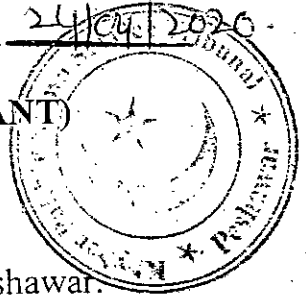
Khyber Pakhtukhwa  
Service Tribunal

Diary No. 2655

Miss. Abida Dilnasheen, Lecturer (History),  
GGDC Sadda Kurram.

Dated 24/04/2020

(APPELLANT)



VERSUS

1. The Chief Secretary Govt of KP, Civil Secretariat Peshawar.
2. The Secretary Higher Education, Govt of KP, Civil Secretariat Peshawar.
3. The Director Higher Education KP, Rano Ghari, New Chamkani Chowk, Peshawar.

(RESPONDENTS)

-----  
APPEAL UNDER SECTION 4 OF THE SERVICE TRIBUNALS ACT, 1974 AGAINST THE ORDER DATED 06.02.2020 IN UTTER VIOLATION OF POSTING TRANSFER POLICY AND AGAINST SUPERIOR COURT JUDGMENT, AND AGAINST REJECTION ORDER DATED 24.03.2020 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT HAS BEEN IMPLIEDLY REJECTED FOR NO GOOD GROUNDS.

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Filed to-day

Registrar

24/4/2020

Re-submitted and filed.

Registrar

27/4/2020

ATTESTED


  
Registrar  
Khyber Pakhtukhwa  
Service Tribunal,  
Peshawar

Form- A

FORM OF ORDER SHEET

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

Case No. - \_\_\_\_\_ /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	27/04/2020	<p>The appeal of Abida Dil Nasheen resubmitted today by Syed Numan Ali Shah Bukhari Advocate, may be entered in the institution registrar and put up to the learned Member for proper order please.</p> <p style="text-align: right;">REGISTRAR - 27/4/2020</p> <p>This case is entrusted to S.B. for preliminary hearing to be put up there on <u>07-05-2020</u></p> <p style="text-align: right;">MEMBER</p> <p style="text-align: center;"><b>ATTESTED</b></p> <p style="text-align: center;"> Syed Fatiha Bukhwa Service Tribunal, Peshawar</p>

07.05.2020

Learned counsel for the appellant Abida Dilnasheen present.  
Preliminary arguments heard.

It was contended by the learned counsel for the appellant that the appellant was serving as Lecturer in Higher Education Department. It was further contended by the learned counsel that the respondent department initiated inquiry against one Mst. Bibi Hajra and on the basis of the said inquiry, Mst. Bibi Hajra Lecturer was recommended for transfer and on the basis of the said inquiry report, the said Mst. Bibi Hajra was transferred from Government Girls Degree College Sadda to Government Girls Degree College Thali Hangu vide order dated 06.02.2020. It was further contended that the respondents <sup>also m</sup> made the appellant <sup>m</sup> scape goat and was transferred <sup>from m</sup> Government Girls Degree College Sadda District Kurram to Government Girls Degree College Hangu District Hangu vide same order. It was further contended that the appellant filed departmental appeal on 08.02.2020 but the same was also rejected vide order dated 24.03.2020. Hence the present service appeal. It was further contended that the appellant is unmarried and the respondent department has transferred her from Sadda District kurram to District Hangu. It was further contended that as per respondent department policy, unmarried woman would not be transferred to other District. It was further contended that no other employee has been transferred to the place of appellant at Government Degree College Sadda as revealed from the impugned order. It was further contended that the appellant has not relinquished the charge and is performing her duty in the said Government Girls Degree College Sadda so far. Therefore, the impugned order is illegal and liable to be set aside.

Contention raised by the learned counsel, need consideration. The appeal is admitted to regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within 10 days, thereafter notices be issued to the respondents for reply/comments. To come up for written reply/comments on <sup>m</sup> 19.05.2020 before S.B

In the meanwhile, status quo to the extent of appellant to be maintained till the date fixed as <sup>m</sup> 19.05.2020 before S.B.

Appellant Directed  
Security & Process Fee

ATTESTED

EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

(M. AMIN KHAN KUNDI)  
(MEMBER-J)

3729/2020.

29.05.2020


Junior to counsel for the appellant present.

On the last date of hearing office was required to issue notices to the respondents for submission of written reply/comments. The record, however, reveals that requisite notices were not issued. Instant matter is, therefore, adjourned to 12.06.2020. The office shall ensure issuance of notices to the respondents for the date fixed. Status quo granted on 07.05.2020 shall remain operative till next date of hearing.

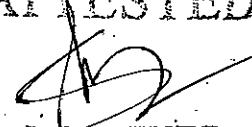
  
Chairman

12.06.2020

Counsel for the appellant present. Addl: AG along with Mr. Khalid Gul, Supdt for respondents present. Written reply not submitted. Learned AAG seeks time for submission of written reply. To come up for written reply/comments on 26.06.2020 before S.B. Status-quo granted on 07.05.2020 shall remain operative till next date of hearing.

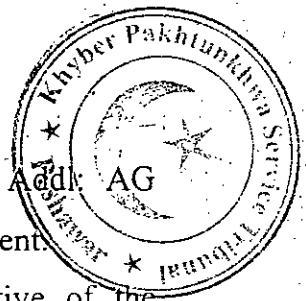
  
(MAIN MUHAMMAD)  
MEMBER

ATTESTED

  
CHIEF CLERK  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar


26.06.2020

Clerk to counsel for the appellant and Addl: AG  
alongwith Mr. Israr, Assistant for respondents present.



Written reply not submitted. Representative of the  
respondents seeks time to submit the same on the next date of  
hearing. Last opportunity granted.

Adjourned to 14.07.2020 before S.B. Status-quo  
granted on 07.05.2020 shall remain operative till next date of  
hearing.

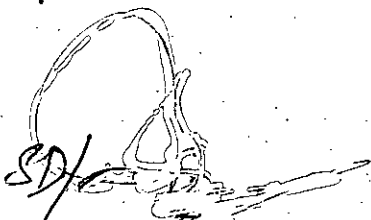
  
MEMBER

14.07.2020


Junior to counsel for the appellant and Addl: AG  
alongwith Mr. Qazi Ayaz, Litigation Officer for respondents  
present.

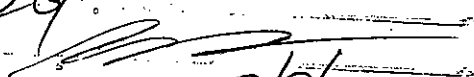
Written reply not submitted despite last opportunity.  
Requested for further adjournment. Adjournment granted  
subject to payment of cost of Rs. 1000/- which shall be borne  
by respondents from their own pockets.

Adjourned to 29.07.2020 before S.B. Status-quo  
granted on 07.05.2020 shall remain operative till next date of  
hearing..

  
(Mian Muhammad)  
Member(E)

ATTESTED

  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

Date of Presentation of Application: 29/7/20  
Number of Words: 2000  
Copying Fee: 22/-  
Urgent: 4/-  
Total: 26/-  
Name of Copy:   
Date of Completion of Copy: 29/7/20  
Date of Delivery of Copy: 29/7/20

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

SA # 6353/2020

Bibi Hajra..... Appellant

**Versus**

Govt. of Khyber Pakhtunkhwa  
Through Chief Secretary, Higher Education  
& others.....

Respondents

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**Superintendent**  
Directorate of Higher Education  
Khyber Pakhtunkhwa Peshawar

Respondent

4

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

SA # 6353/2020

Bibi Hajira .....Appellant

**Versus**

Govt. of Khyber Pakhtunkhwa  
Through Chief Secretary  
& others.....

Respondents

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

**Respectfully Sheweth: -**

**Preliminary Objections:-**

1. That the appellant has got neither cause of action nor locus standi to file the instant Service appeal.
2. That the appellant has not come to this Honourable Tribunal with clean hands.
3. That the appellant is trying to conceal material facts.
4. That the appellant is estopped by his own conduct to file the instant service appeal.

**Facts:-**

1. Pertains to record.
2. Correct to the extent that the appellant was transferred to Govt; Girls Degree College, Sadda, Kurram in 2017 but it is worth to mention here that she was transferred from Govt; Girls Degree College Alizai under report. Moreover, in Govt; Girls Degree College Sadda Kurram no single student was enrolled in her subject.
3. Correct to the extent that respondent No. 7 was incharge Principal/DDO during that period rest of the Para is incorrect. That respondent No. 7 was properly declared/Notified as DDO/Incharge Principal by FATA Secretariat vide Notification dated: 27-05-2014 (**Annex-A**).
4. Correct to the extent that issue of allotment of bungalow was raised and an inquiry was conducted and one of the recommendations of the inquiry committee was that "The Principal may be directed to allot room to Mst. Hajira Bibi in the hostel to remove her difficulties while coming from Dogar to Sadda station but without her spouse as the FATA female students belong to the tribal families and mostly they are veild women, hence living with spouse inside the premises of Girl College would be against the regional traditions and customs

2

(Annex-B) and in light of inquiry report room was allotted to the appellant vide office order dated: 07-08-2017" (Annex-C). Again an issue was raised when the appellant captured pictures and made videos of the students and complaints were received from students and parents to incharge Principal/Respondents No. 7 (Annex-D, E,F,G) and demanded to relive the Appellant and respondent No. 7 relived the Appellant vide order dated: 24-05-2019 w.e.f 23-05-2020 assigning reason of her constant unrest hurdles, unsocial and immoral attitude towards the Principal, students of the Govt; Girls Degree College, Sadda as well as Staff members (Annex-H). The department vide letter dated 24-06-2019 withdraw the reliving of the Appellant (Annex-I) and inquiry committee was constituted to probe into grievances of students vide letter dated: 26-06-2019 (Annex-J) wherein it was recommended that the Appellant may be transferred /adjusted somewhere else where students of her subject is enrolled as she bears extremely casual attitude towards her duties and she is habitual of her careless attitude and behaviour from her very 1<sup>st</sup> day of her appointment. As no students are enrolled in her subject so she will always be busy in contriving something useless and unnecessary. Transferring her will also give consolation to students and the parents. The committee further recommended that as she is habitual of such activities so minor penalty like stoppage of increment may as be imposed upon her (Annex-K).

5. Correct.
6. Pertains to record.
7. Needs no comments.

**Grounds: -**

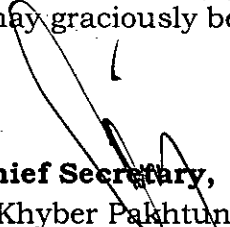
- A. Incorrect. That the Appellant was problematic and different complaints were received from Principal, Staff, Students of the College and parents of the students and also so many inquiries were conducted which is also evident from letter of Deputy Director Colleges dated: 15-03-2019 (Annex-L) Hence, the transfer was done in best public interest.
- B. Incorrect. That the appellant was habitual of her reckless attitude and behaviour and several complaints were received against her as already explained in Para 4 of facts.

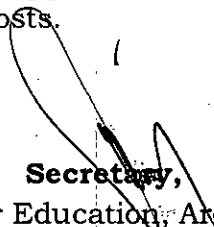



C. Incorrect. That vide order dated 06-02-2020 both the appellant and the respondent No. 7 was transferred from Govt; Girls Degree College, Sadda in best public interest to resolve the issue once for all. It is worth to mention here that respondent No. 7 filed service appeal 3729/2020 titled Abida Dilnasheen vs Govt; of Khyber Pakhtunkhwa before the Honorable Service Tribunal wherein stay has been granted by the Honorable Service Tribunal (**Annex-M**).


**Prayers: -**


It is, therefore, humbly prayed that the instant Service appeal is devoid of merit, hence may graciously be dismissed with appropriate costs.

  
**Chief Secretary,**  
Govt: of Khyber Pakhtunkhwa  
Respondent No. 01

  
**Secretary,**  
Higher Education, Archives  
& Library Department  
Respondent No. 02

  
**Director**  
Higher Education Department  
Respondent No. 03

  
**Principal**  
Govt; Girls Degree College, Sadda (Kurram)  
Respondent No. 4

  
**Principal**  
Govt: Girls Degree College  
Sadda Tribal District Kurram

5

**TRIBUNAL, PESHAWAR**

S.A # 6353/2020

Bibi Hajra .....Appellant

**Versus**

Govt. of Khyber Pakhtunkhwa  
Through Secretary, Higher Education Peshawar & Others..... Respondents

**AFFIDAVIT**

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

Identified by:



Deponent

**Superintendent**

**Directorate of Higher Education  
Khyber Pakhtunkhwa Peshawar**

## INQUIRY REPORT.

**INTRODUCTION.** The Incharge Principal of GGDC Satta Kurram Agency under reported Mst. Bibi Hajira a lecturer of Home Economics of the College for late coming to duty, frustration creator, rude behavior and a source of unrest in the college. The Principal also requested the Director of Education FATA to transfer the services of the said lecturer to any other college and initiate disciplinary action against her under E&D rules 2001(F/A).

The Directorate of Education FATA ordered to probe the matter through an inquiry committee and notified the following officers to conduct an impartial inquiry vide No. 6011-15 dated 26/4/2018 for submitting report (F/B).

- i. Muhammad Nawaz Assistant Director (Estab).
- ii. Rehmat Khan Assistant Director (SNE).

**MECHANISM.** The member of the inquiry Committee visited GGDC Kurram Agency on dated 11.5.2018. The teaching staff and non-teaching staff were present in the college. The College was functional as usual. A number of female students were present in the college compound. The Committee members approached Principal office and discussed the long standing issue relates to Mst. Hajira. The Principal concerned reiterated the same stand mentioned in her complaints submitted to Director Education FATA previously (vide F/B). The Committee had a joint meeting with teaching staff and put few queries before them (F/C). At last Mst. Hajira also appeared before the Inquiry committee and shared her views and requested that she does have accommodation problem. According to her statement, she comes to college for duty from Dogar willage which is living at a distance of 45 KM. She requested for accommodation in premises of college to live alongwith her husband but there is not separate parda wall for each residential quarter. The same nature letter has also been received by the Principal from Kurram Political Union (F/D) requesting therein to reject the request of lecturer concerned on the plea that she may not be allowed to live with her spouse within the college due to the parda of their female students.

### FINDINGS.

The Following findings are conducted:-

1. The main issue is that of the accommodation of the concerned lecturer states time and again that she has been accommodated in the uncle of her husband house in  
re. The distance from the residence to the duty station is far away  
A with no regular traffic. It seems difficult for her to perform her duty

instruction time and scope of the residential quarters, the executing  
e C&W Building Deptt. ignored the social aspect of parda system  
ters and hence created a problem.

It is pertinent to mention here, that being a girls college no single students of Home Economic has been enrolled in this very college so far.

Recommendations.

The following points are recommended for solution of the issue.

i. The Principal may be directed to allot room to Mst. Hajira Bibi in the Hostel to remove her difficulties while coming from Dogar to Sadda station but without her spouse as the FATA female students belong to the tribal families and mostly they are veiled women, hence living with spouse inside the premises of Girls College would be against the regional traditions and customs.

ii. Moreover, all those male who are mature/adults and are not college employees but living with their families may also be expelled from college premises.

iii. The political administration may be approached by AEO office to reflect and bring a residential scheme in upcoming ADP to construct family quarters and bungalows for female teaching staff so that to resolve the issue for ever.

iv. On short term basis, parda wall may be constructed either from college funds or from M&R (Agency funds) and PA authority may be approached for this purpose and thereafter the existed quarter/bungalows may be allotted to the staff on priority basis as per rules.

v. The post of Principal may be filled with permanent Principal or with any experienced Professor in order to run the college without any difficulties and problems in future.

Inquiry Officers

*Mat*  
1. Rehmat Khan AD (SNE),  
Directorate of Education FATA.

*G. G. G.*  
2. Muhammad Nawaz,  
Assistant Director (Estab.)  
Directorate of Education FATA.

OFFICE OF THE PRINCIPAL GOVT: GIRLS DEGREE COLLEGE SADDA  
Pr/GGDC/Sadda No. 144-46 Dated 07/08/2017

**OFFICE ORDER.**


As per Inquiry Report, conducted by Mr. Azad Khan Deputy Director (F/A) and Mst: Dr Rukhsana Aziz Assistant Director (M & I) D.E FATA vide Endst: No. 11861 Dated 19/07/2017.

Accordingly Mst: Hajra Bibi Lecturer in Home Economics is allotted Room No. 07 in the hostel to live with her children to remove her financial difficulties while coming from Dogar to GGDC Sadda.

Principal  
GGDC Sadda Kurram Agency

Copy to:

1. Director of Education FATA Peshawar.
2. Mst: Hajra Bibi Lecturer in Home Economics

  
Principal  
GGDC Sadda Kurram Agency  
Sadda Kurram Agency

To

The Principal  
GGDC Sadda District Kurram

Subject: REQUEST FOR RELIEVING/TRANSFER MST: HAJRA BIBI LECTURER.

It is requested that one Mst: Hajra Bibi Lecturer in Home Economics is constant headache for us and now she has crossed all the limits regarding her behavior.


Firstly she was catching pictures/ making videos at the office but now she started catching pictures and making videos of college's students.


Yesterday on 22/05/2019 what she acted, about which the higher authorities are to be informed immediately. We all are from respected families and being Pathans if our families know about such situation like this, it will lead us to enmity with the said lecturer.


In future if such video or pictures goes viral or uploaded on social media, then who will be responsible for such act.

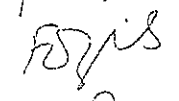
In this regard we are requesting you to inform the higher authority to take serious action against her and transfer her service from this college but if it is not possible then we are demanding you to transfer our services from here because we are from respected families and we cannot tolerate such unlawful action by Mst: Hajra Bibi lecturer at GGDC Sadda.





Shamida Banzash 

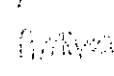
Sabina Naz 

Zeba Khan 

Faris Mahsood 

Shagufta Afridi 

Uzma MEHARBAN 

Amina 

محضور جناب پرنسپل صاحبہ گریز کالج صدقہ

E

آپ صاحبہ کی توجہ ہم اس جانب مبذول کروانا چاہتے ہیں کہ آج بھورخہ 22/05/2019 کو ہمارے کچے پریکٹیکل کے سلسلے میں گریز کالج صدقہ آئے جو کہ کلاس میں سینکڑوں میں زیر تعلیم ہیں۔

کالج یذا میں آئیڈ لیگچرار صیسی یا جبرہ جی جی نے موبائل کا غلط استعمال کر کے کالج یذا کی طالبات سے ویڈیو کروائی اور تصاویر بھی نکلوائی۔ طالبات نے ہمیں وقت پر آگاہ کر دیا۔

سب سے بڑی غلطی متعلقہ لیگچرار نے کی ہے۔

ہم آپ صاحبہ سے مذکورہ لیگچرار کے خلاف سخت قانونی کارروائی کی درخواست کرتے ہیں۔ اور اعلیٰ حکام کو بھی اس بابت آگاہ کر دینگے۔ اسی لیگچرار کو جلد از جلد Relieve کر کے مسئلے کو حل کر دے۔ ورنہ تمام ترمیمہ داری کالج پرنسپل پر ہوگی۔ سرپرست طالبات

- (1) یعقوب خان
- (2) سدیم خان
- (3) رحیم نور
- (4) فضل میر
- (5) حاجی سلیم خان

*[Handwritten Signature]*

حضور جناب پیر نسیم صاحبہ گریڈ کالج صدہ کرم

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آپ صاحبہ سے التماس کی جاتی ہے کہ آج پورے  
 2019 | 22 | کو ہم پیر پٹنل کے سلسلے میں گورنمنٹ گریڈ کالج  
 کالج آف ایڈم کلاس 2nd year کی طلبات کے لیے پیر پٹنل  
 پیر پٹنل کے دوران کالج میں ایک ٹیکنیکل جس کا نام میں حاضر ہوں گی  
 ہے۔ یہ سب سے پہلے نکال کر بیمار کی ویڈیو کی اور اسی طرح ہم سے  
 کچھ تصویر بھی نکل جائیں ہم نے منع کیا لیکن اس کے باوجود بھی  
 اس نے یہ غلط حرکت کی

آپ صاحبہ سے درخواست کی جاتی ہے کہ مزید کوئی  
 کی خلاف سخت کر دینی ہے کی جائے

تو میری بانی ہو گی

طالبات گریڈ کالج صدہ

نام	والد	طالبات گریڈ کالج صدہ
1) نائیدہ	فضل میر	Nahida
2) یاسینہ	رحم نور	Tamianoor
3) سیری	سلیم خاں	Yasra
4) زوریا	صدیق خاں	Nooria
5) خدیجہ	عقلم احمد	Khadija
6) شائستہ	نور اقبال	Shaista
7) افسانہ	علیہ اللہ	Afsana
8) وحیدہ	حکمت	Wahida



خدمت جناب پرنسپل صاحبہ گزرتہ کالج عمدہ

بہایت احترام کے ساتھ گزارش کی جاتی ہے  
کہ بحودہ 22/5/2019 کو کالج میں طالبات  
کی پریکٹیکل تھی۔ سینڈ انٹرن کی طالبات آئے  
ہوئے تھے۔ اسی دوران کالج کی ایک لیکچرار  
میں جی یا جرنل نے موبائل کے ذریعے طالبات  
سے ویڈیو کروائی اور رصاصہ پر بھی لگانے  
پہ موقع پر موجود تھی میں نے اور دوسرے  
البات نے منع کیا لیکن اسی نے انکار کرتے  
کنزری تھی۔

آپ صاحبہ کو بروقت خبر دی تاکہ  
سے کو حل کیے۔



المیر خاتون  
لیب اسٹڈنٹ  
گزرتہ کالج عمدہ



RELIEVING CHIT

The services of Mst: BIBI HAJRA Lecturer in Home Economics BPS-17 is no longer required to this institution and is hereby relieved from duty on 23/05/2019 regarding her constant unrest, hurdles, unsocial and immoral attitude towards the undersigned, students of GGDC Sadda as well as staff members.

As per request of student parents to relieve her as per issue of making video and capture pictures of students at GGDC Sadda on 22/05/2019

Her service is hereby placed at the disposal of Director Higher Education Khyber Pakhtunkhwa Peshawar, for further posting and initiate disciplinary action against the lecturer concerned under E & TD rules 1973, 2001.

Principal  
Govt: Girls Degree College  
Sadda District Kurram

No. 103-07 Dated 24/5/2019

Copy to the

1. Secretary Higher Education Khyber Pakhtunkhwa Peshawar.
2. Director Higher Education at Peshawar.
3. Director Education Newly Merged Districts at Peshawar.
4. Deputy Commissioner at Parachinar District Kurram
5. District Accounts officer Kurram at Parachinar with the request to stop her pay and issue LPC as per source form enclosed.
- 6) Lecturer concerned at GGDC Sadda

Principal

Govt: Girls Degree College  
Sadda District Kurram

Attended  
Q



GOVERNMENT OF KHYBER PAKHTUNKHWA  
HIGHER EDUCATION, ARCHIVES &  
LIBRARIES DEPARTMENT

No. SO(C-III)/HE/1-2/19/Hajira Bibi/  
Dated Peshawar, 24<sup>th</sup> June, 2019

Annex-B  
P-6

To

The Director Higher Education,  
Khyber Pakhtunkhwa, Peshawar.

Subject: RELIEVING CHIT.

I am directed to enclose herewith a copy of the subject relieving chit issued by the Principal, GGDC, Sadda. District Kurram bearing No. 103-07 dated 28.05.2019 whereby Ms. Hajira Bibi, Lecturer in Home Economics has been relieved without any legal authority. The same may be treated as withdrawn and disciplinary action be initiated against the Principal concerned for the use of powers not authorized by the government.

  
Section Officer (Colleges-III)

CC to:

2. PS to Secretary Higher Education for information.

  
Section Officer (Colleges-III)

Attested  




DIRECTORATE OF HIGHER EDUCATION

KHYBER PAKHTUNKHWA

KHYBER ROAD, PESHAWAR

Tel # 091-9210242 Fax # 091-9210215

[dhekpesh@gmail.com](mailto:dhekpesh@gmail.com) [facebook.com/dhekpeshawar](https://www.facebook.com/dhekpeshawar) [twitter.com/dhekpeshawar1](https://twitter.com/dhekpeshawar1)

No. 15302-19 /54-III/Complaint/AD(G)

Dated Peshawar the 26/6 /2019


To

1. The Principal,  
Govt. Degree College Bagga,  
Kurram.
2. Deputy Director(Colleges)  
Merged District Khyber Pakhtunkhwa.

Subject: INQUIRY REGARDING GRIEVANCES OF STUDENTS OF GGDC, SADDA.

Respected Sir / Madam, السلام عليكم


I am directed to refer to the subject noted above and to enclose herewith a self-explanatory application and to state that the Director, Higher Education is pleased to nominate the above mentioned Officers as inquiry committee members to probe into matter and to submit a detailed report within a week to this office for further proceeding into the instant case, please.

  
Assistant Director (General)

Enclst No. 15302-19

Copy to:

1. PA to Director, Local Directorate.
2. Principal Govt Girls Degree College, Sadda for information.

  
Assistant Director (General)  
Higher Education Department

V

B

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INQUIRY REPORT

INTRODUCTION:

On 22<sup>nd</sup> of May, 2019, some students/parents submitted a written complaint letter to the Incharge principal GGDC Sadda with the remarks that Mst: Bibi Hajra (Lecturer in Home Economics) of the college had captured their photos and made video while they were busy in taking their practical examination at laboratory. The said unfortunate incident caused severe (Grievances among students/Parents). The Directorate Higher Education Khyber Pakhtunkhwa ordered to probe into the matter through an inquiry officer vide No. 13322-23, dated: 26-06-2019 and notified Mr. RAIS AHMAD JAN BPS-19 Principal Govt: Degree College Bagan Lower Kurram as an inquiry officer to conduct an impartial inquiry and redress the "Grievances of students/parents"

MECHANISM OF INQUIRY:

The inquiry Officer visited personally check the environment of the college. The Principal, Ex: Incharge Principal, teaching, Non teaching staff and students were inquired and concluded as follow.

- 1- The Principal Miss. Saira Khatoon BPS-20 was inquired regarding the case. She had already interview all the staff members along with students about the situations. She was of the opinion that the said lecturer is a constant headache for college and the issue of capturing pictures and making video was a serious case. She had committed the said mistake and the credit goes to Incharge Principal Abida Dilnasheen who maintained the law and order situations but the lecturer concerned and his husband has still a serious threat from the arrogant parents of the students.
- 2- The Incharge Principal stated that on 22<sup>nd</sup> May 2019, she was usual present in the office, some students of 2<sup>nd</sup> year rushed into her office complaining that Mst: Bibi Hajra had captured their photos and made video while they were busy in taking their practical examination. The Lab: Attendant also endorsed the allegations of the students. The said lecturer was at once called to the office taken her mobile from her and deleted the photos and videos on the spot to the threat that it should not get viral on social media. The said students informed their parents about the incidents and approached college furious and angry. The Incharge Principal added that she tried her level best to satisfy the angry parents and to defuse the situations but students and parents were not ready to compromise on their demand to relieve the accused lecturer. An Internal Committee was constituted to probe into the matter. As per recommendations of the Internal Committee, upon the strong demand of students/ parents and looking the gravity of the situations, the said lecturer was relieved on 23<sup>rd</sup> May, 2019 in order to defuse the tense situations. She added that the lecturer concerned is a habitual absentee and very aggressive quarrelsome and unsocial in

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(109)

her behavior with colleagues and students. Number of inquiries has been conducted against her in past and deduction of salaries has been made as a token of punishment. Further the said lecturer has been constantly about the accommodation to live in bachelor Hostel with husband and children. The college administration has always directed her to reside with her children in hostel where other staff members has been accommodated but her husband could not be accommodated in hostel but she refused to do so. Moreover the said lecturer has been a constant source of trouble and headache for the college administration due to undue interference in administrative affairs and the concerned quarters have been informed about her time and again.

- 3- In response to the alleged video /pictures scandal, the accused lecturer Mst: Bibi Hajra did confirm that she had captured photos and made video but it was general panoramic video of the college not specific to some girls. She argued that she is a resident of Dogar and requested for accommodation in college premises to live with her husband and children but still she had not been allotted any accommodation. In the same video and scandal issue she has also relieved me which is illegal.
- 4- The students who were present on the spot were also inquired about the alleged video/ picture scandal. They were confirming the incident as real and specific.
- 5- The opinion /views of almost all the staff members (teaching and non teaching) were sought. They were reiterating the stance of incharge principal and showing severe reservations about the accused lecturer Mst: Bibi Hajra.

**FINDINGS:**

To put the entire inquiry in a nutshell, the following findings are concluded:

- a- The issue of "capturing pictures and making video" was without any doubt a very serious and threatening incident generally in Girls College. Either the picture video was general or specific, it is unsocial, illegal and annoying.
- b- There was complete study environment and all the allegations /charges leveled by Hajra Bibi confirmed from the students and staff members were baseless / irrelevant and the concerned lecturer did so only to vilify the reputation of institution to get fulfilled her personal interests.
- c- The present regular Principal Saira Khatoon BPS-20 has also recommended that the said accused lecturer is a constant source of headache for college administration and problematic which has greatly suffered the smooth functioning of the college.
- d- The Undersigned is also well aware of the behavior and absenteeism when she was posted at Govt: Girls Degree college Alizai. The mount of Rupees 205832/- has been deposited from her on Challan in Govt; exchequer on 17/12/2012 vide challan No-04. ( Challan copy enclosed)
- e- In 2016 due to absence at GGDC Alizai for two months her pay for the said period deducted by the Dy: director Colleges No. 8505, dated 17/08/2016.

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- f- In 2017 salary deducted from her pay vide Deputy Director colleges letter No. 19037, dated 27/11/2017 due to absenteeism. (Copy enclosed)
- g- On the basis of same attitude she has already been warned by Director Higher Education vide No. 14190-93, dated 14/09/2017. (copy enclosed for ready reference)
- h- Above all what is astonishing is that "Home Economics" is a subject specially offered for girls but being a girls college no student has been enrolled in the said subject in this college although lecturer in Home economics is available.

**RECOMMENDATIONS:**

After thorough evaluation of all aspects of inquiry, the following recommendations are hereby proposed in the best interest of the college.

- i- From the above stated findings it is quite clear that the said lecturer is habitual of her reckless attitude and behavior from the very 1st day of her appointment. As Mst: Bibi Hajra (Lecturer in Home Economics) has already been relieved w.e.f 23-05-2019, she may please be adjusted somewhere else in the college having students of her subject as she bears extremely casual attitude towards her duty. Having no students /class she will always be busy in contriving something useless and unnecessary. Transferring her will also give consolation to the students and their parents.
- ii- As the accused lecturer is habitual with such activities, so light punishment like stoppage of increment etc as per law is also recommended that she may not dare like this in any other college of her posting.

Dated- 24/09/2019



INQUIRY OFFICER

RAIS AHMAD JAN (BPS-19)  
PRINCIPL GDC BAGAN, TRIBAL DISTRICT KURRAM

ATTESTED

Annex - 6

19



DIRECTORATE OF EDUCATION MERGED DISTRICT  
WARSAK ROAD PESHAWAR PAKISTAN  
PHONE NO. 091-9210166 FAX: 9210216

NO. 1/30 GGDC Sadda/V-II dated: 1/2019

15/3

To

The Deputy Secretary (Colleges)  
Govt. of Khyber Pakhtunkhwa  
Higher Education, Archives & Libraries Department  
Civil Secretariat Peshawar

Subject:

COMPLAINT/REQUISITION FOR REGULAR PRINCIPAL B-20 OR B-19  
GGDC SADDA DISTRICT KURRAM

Memo:

I am directed to refer Section Officer (Colleges-III) Higher Education Department letter No. SO(C-III)/HE/1-2/2019/731/ wc dated 18-2-2019 on the subject above and to state that Mst. Bibi Hajira regular lecturer B-17 in Home Economics and Apida Dil Nasheen regular lecturer B-17 in History and in-charge principal GGDC S District Kurram have developed personal grudges with each other due to which the environment of the college is badly affected.

Despite of conducting inquiries and issuances of verbal and written warnings but no changes are seen in their respective attitudes and behaviors (Copy attached).

Keeping in view their negative and unchangeable attitudes both lecturers proposed for transfer and adjustment some elsewhere and a regular principal B-Associate Professor B-19 may be provided as principal / DDO of the said college as recommended by the inquiry committee please (Copy attached).

*[Signature]*  
Deputy Director (Colleges)

Encl: No. / dated 2019

Copy forwarded to:

1. PA to Director Higher Education Khyber Pakhtunkhwa.
2. PA to Director Education New Merged Districts.

Deputy Director (Colleges)

*[Handwritten notes and signatures]*  
15/3/19  
27  
2019  
Supda  
P.V. file  
CA



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①

M.C.

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

APPEAL NO. 3729/2020

Khyber Pakhtunkhwa  
Service Tribunal

Miss. Abida Dilnasheen, Lecturer (History),  
GGDC Sadda Kurram.

Diary No. 2655

Dated 24/04/2020

(APPELLANT)

VERSUS

1. The Chief Secretary Govt of KP, Civil Secretariat Peshawar.
2. The Secretary Higher Education, Govt of KP, Civil Secretariat Peshawar.
3. The Director Higher Education KP, Rano Ghari, New Chamkani Chowk, Peshawar.



(RESPONDENTS)

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APPEAL UNDER SECTION 4 OF THE SERVICE TRIBUNALS ACT, 1974 AGAINST THE ORDER DATED 06.02.2020 IN UTTER VIOLATION OF POSTING TRANSFER POLICY AND AGAINST SUPERIOR COURT JUDGMENT, AND AGAINST REJECTION ORDER DATED 24.03.2020 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT HAS BEEN IMPLIEDLY REJECTED FOR NO GOOD GROUNDS.

PRAYER:

THAT THE ACCEPTANCE OF THIS APPEAL, THE IMPUGNED ORDER DATED 06.02.2020 and 24.03.2020, MAY BE SET ASIDE TO THE EXTENT OF THE APPELLANT BEING, PASSED IN VIOLATION OF POSTING/TRANSFER POLICY. THE RESPONDENT DEPTT: MAY FURTHER PLEASE BE DIRECTED NOT TO TRANSFER THE APPELLANT IN VIOLATION OF POSTING/TRANSFER POLICY. ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.

Filed to-day

Registrar

24/4/2020

Received and filed

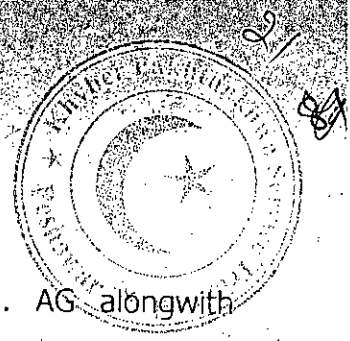
Registrar

27/4/2020

ATTESTED

Registrar  
Khyber Pakhtunkhwa  
Service Tribunal

P.O.  
  
9. 2020



3729/20

29.07.2020

Counsel for the appellant and Addl. AG alongwith Jehanzaib Awan, Superintendent for the respondents present.

Representative of the respondents has furnished reply/comments. Placed on record. Representative of the respondents also paid cost of Rs. 1000/- (Rupees One thousand) which was handed over to learned counsel for the appellant and receipt thereof obtained and placed on record.

The appeal is assigned to D.B for arguments on 19.08.2020. The appellant may furnish rejoinder, within ten days, if so advised. Status quo granted on 07.05.2020 shall remain operative till the date fixed.

  
Chairman


19.08.2020

Due to summer vacations, the case is adjourned to 29.10.2020 for the same.

  
Reader

Date of Presentation of Application 15/8/20  
 Number of 2000  
 Copies 22/5  
 Urgent 4/1  
 Total 26/1  
 Name of 15/10/20  
 Date of Receipt

Certified to be true copy

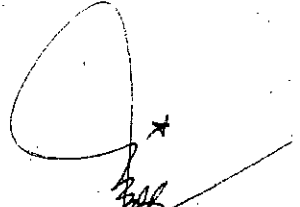
  
Sd/-  
Secretary

26.06.2020

Clerk to counsel for the appellant and Addl: AG  
alongwith Mr. Israr, Assistant for respondents present.

Written reply not submitted. Representative of the  
respondents seeks time to submit the same on the next date of  
hearing. Last opportunity granted.

Adjourned to 14.07.2020 before S.B. Status-quo  
granted on 07.05.2020 shall remain operative till next date of  
hearing.

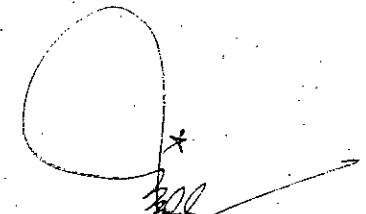
  
MEMBER

14.07.2020


Junior to counsel for the appellant and Addl: AG  
alongwith Mr. Qazi Ayaz, Litigation Officer for respondents  
present.

Written reply not submitted despite last opportunity.  
Requested for further adjournment. Adjournment granted  
subject to payment of cost of Rs. 1000/- which shall be borne  
by respondents from their own pockets.

Adjourned to 19.07.2020 before S.B. Status-quo  
granted on 07.05.2020 shall remain operative till next date of  
hearing..

  
(Mian Muhammad)  
Member(E)

ATTESTED

  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

23  
[Signature]

07.05

3729/2020

29.05.2020

Junior to counsel for the appellant present.

On the last date of hearing office was required to issue notices to the respondents for submission of written reply/comments. The record, however, reveals that requisite notices were not issued. Instant matter is, therefore, adjourned to 12.06.2020. The office shall ensure issuance of notices to the respondents for the date fixed. Status quo granted on 07.05.2020 shall remain operative till next date of hearing.

[Signature]  
Chairman

12.06.2020

Counsel for the appellant present. Addl: AG alongwith Mr. Khalid Gul, Supdt for respondents present. Written reply not submitted. Learned AAG seeks time for submission of written reply. To come up for written reply/comments on 26.06.2020 before S.B. Status-quo granted on 07.05.2020 shall remain operative till next date of hearing.

[Signature]  
(MAIN MUHAMMAD)  
MEMBER

ATTESTED

[Signature]  
Khalid Gul  
Senior Counsel  
Peshawar

~~24~~

07.05.2020

Learned counsel for the appellant Abida Dilnasheen present.  
Preliminary arguments heard.


It was contended by the learned counsel for the appellant that the appellant was serving as Lecturer in Higher Education Department. It was further contended by the learned counsel that the respondent department initiated inquiry against one Mst. Bibi Hajra and on the basis of the said inquiry, Mst. Bibi Hajra Lecturer was recommended for transfer and on the basis of the said inquiry report, the said Mst. Bibi Hajra was transferred from Government Girls Degree College Sadda to Government Girls Degree College Thall Hangu vide order dated 06.02.2020. It was further contended that the respondents <sup>are</sup> made the appellant <sup>the</sup> scape goat and was transferred <sup>to</sup> Government Girls Degree College Sadda District Kurram to Government Girls Degree College Hangu District Hangu vide same order. It was further contended that the appellant filed departmental appeal on 08.02.2020 but the same was also rejected vide order dated 24.03.2020. Hence the present service appeal. It was further contended that the appellant is unmarried and the respondent department has transferred her from Sadda District kurram to District Hangu. It was further contended that as per respondent department policy, unmarried woman would not be transferred to other District. It was further contended that no other employee has been transferred to the place of appellant at Government Degree College Sadda as revealed from the impugned order. It was further contended that the appellant has not relinquished the charge and is performing her duty in the said Government Girls Degree College Sadda so far. Therefore, the impugned order is illegal and liable to be set aside.

Contention raised by the learned counsel, need consideration. The appeal is admitted to regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within 10 days, thereafter notices be issued to the respondents for reply/comments. To come up for written reply/comments on <sup>19</sup>05.2020 before S.B

In the meanwhile, status quo to the extent of appellant be maintained till the date fixed as <sup>19</sup>05.2020 before S.B.

ATTESTED

M. Amin  
(M. AMIN KHAN KUNDI)  
(MEMBER-J)

  
Secretary