

Khyber Pakhtunkhwa Service Tribunal, at Camp Court, Abbottabad

S.A#. 16442/2020 Mst. Shakeela Bibi Vs. Government of Khyber Pakhtunkhwa

Date of Institution: 31.12.2020

Date of Decision: 28.09.2021

Order

28.09.2021

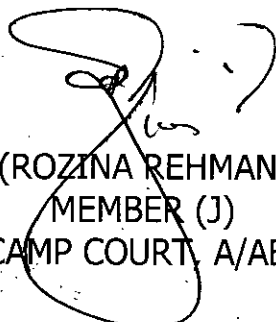
Appellant present through counsel.

Preliminary arguments heard. Record perused.

Brief facts of the case are that appellant is serving as Senior Subject Specialist in G.G.H.S.S No.2, Mansehra. She submitted E-Transfer application form vide application NO.5523 for transfer to G.G.H.S.S Havailian, Abbottabad. She also applied through proper channel to respondent No.2 for her transfer but instead of transferring the appellant, respondent No.5 was transferred from G.G.H.S.S Ghari Pulgran to G.G.H.S.S Havelian vide impugned transfer order dated 03.09.2020. As per Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974, any civil servant aggrieved by any final order, whether original or appellate, made by a departmental authority in respect of any of the terms and conditions of his service may, within thirty days of the communication of such order to him, prefer an appeal. In the instant case, there is no impugned order and the appellant has challenged the transfer order of Sadia Afsheen on the strength of her request addressed by one Abdul Kareem Tordher to Zia Ullah Khan Bangash Advisor to Chief Minister. Learned counsel failed to show any order which has made the appellant aggrieved as she has not been transferred.

For what has been discussed above, instant service appeal being incompetent, is hereby dismissed in limine. No order as to costs. File be consigned to the record room.

ANNOUNCED.
28.09.2021

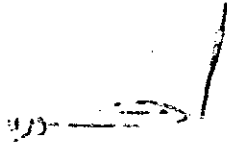

(ROZINA REHMAN)
MEMBER (J)
CAMP COURT, A/ABAD

20.05.2021

Due to cancellation of tour, Bench is not available.
Therefore, case is adjourned to 28.09.2021 for the same as
before.

5/11/21


Reader



28.09.21

~~_____~~



FORM OF ORDER SHEET

Court of _____

Case No.-

16442

/2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	31/12/2020	<p>The appeal of Mst. Shakeela Bibi presented today by post through Mr. Muhammad Arshad Khan Tanoli 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> <p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>20-05-2021</u></p> <p style="text-align: right;"> CHAIRMAN</p>
2-		

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

Appeal No. _____/2020

Mst. Shakila Bibi, Senior Subject Specialist (History Cum Civics)
G.G.H.S.S No. 2 Mansehra.

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa through Chief Secretary K.P, Peshawar &
others.

...RESPONDENTS

SERVICE APPEAL

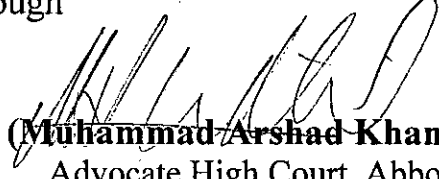
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S.#	Description	Page No.	Annexure
1.	Service appeal along with affidavit	1 to 9	
2.	Copy of E-transfer application	10-11	"A"
3.	Copies of applications of the appellant	12-22	"B"
4.	Copy of impugned transfer order dated 03.09.2020	23-24	"C"
5.	Copy of departmental dated appeal 01/10/2020	25	"D"
6.	Wakalatnama	26	


...APPELLANT

Dated: 30/12 /2020

Through


(Muhammad Arshad Khan Tanoli)
Advocate High Court, Abbottabad

BEFORE THE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 16974

Date 31/12/2020

Appeal No. 16442 /2020

Mst. Shakila Bibi, Senior Subject Specialist (History Cum Civics)
G.G.H.S.S No. 2 Mansehra.

...APPELLANT

VERSUS

1. Govt. of Khyber Pakhtunkhwa through Chief Secretary K.P, Peshawar.
2. Secretary Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. Director Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar.
4. District Education (E&SE), Mansehra.
5. Sadia Afsheen, Subject Specialist against the post of (History Cum Civics) G.G.H.S.S Havelian, Abbottabad.

...RESPONDENTS

~~Filed to-day~~

~~Registrar~~
31/12/2020

SERVICE APPEAL UNDER SECTION 4 OF
KPK SERVICE TRIBUNAL ACT, 1974, FOR
DECLARATION TO THE EFFECT THAT
RESPONDENT NO. 5 HAS BEEN
TRANSFERRED FROM G.G.H.S.S GHARI
PULGRAN TO G.G.H.S.S HAVELIAN
ABBOTTABAD VIDE IMPUGNED TRANSFER

ORDER DATED 03/09/2020. THE APPELLANT IS ELIGIBLE TO BE POSTED IN G.G.H.S.S HAVELIAN DISTRICT ABBOTTABAD AS PER TENURE POLICY AND AGAINST THE VACANT POST OF HISTORY CUM CIVICS. HENCE, IMPUGNED TRANSFER OF RESPONDENT NO. 5 IS AGAINST WRONG POSTING, DISCRIMINATORY, AGAINST THE LAW AND THE SAID ORDER DATED 03.09.2020 IS LIABLE TO BE SET ASIDE.

PRAYER: ON ACCEPTANCE OF THE INSTANT SERVICE APPEAL, IMPUGNED TRANSFER ORDER DATED 03/09/2020 TO THE EXTENT OF RESPONDENT NO. 5 MAY GRACIOUSLY BE SET ASIDE AND RESPONDENTS MAY BE DIRECTED TO TRANSFER THE APPELLANT FROM G.G.H.S.S NO. 2 TO G.G.H.S.S HAVELIAN DISTRICT ABBOTTABAD. ANY OTHER RELIEF WHICH THIS HONOURABLE TRIBUNAL DEEM APPROPRIATE IN THE CIRCUMSTANCES OF THE CASE MAY ALSO BE GRANTED TO THE APPELLANT.

Respectfully Sheweth;-

Following are the facts, giving rise to the instant service appeal.

1. That the appellant is serving as Senior Subject Specialist (BPS-18) in the subject of History Cum Civics in G.G.H.S.S No. 2 Mansehra and has completed his period of service tenure required for transfer.
2. That the appellant is resident of District Abbottabad and a post of Senior Subject Specialist was lying vacant in G.G.H.S.S Havelian District Abbottabad which is near to the place of her abode. Therefore, the appellant submitted E-transfer application form vide application No. 5523 for transfer from G.G.H.S.S No. 2 Mansehra to G.G.H.S.S Havelian, Abbottabad vide application dated 16/03/2020. Copy of E-transfer application is attached as Annexure "A".

3. That the appellant also applied through proper channel to respondent No. 2 for her transfer from Mansehra to Havelian. Copies of applications of the appellant are attached as Annexure "B".

4. That there is vacant post of History Cum Civics in GGHS Havelian and the appellant being the only candidate of Senior Subject Specialist in History Cum Civics, but respondents' Department instead of transferring the appellant, transferred respondent No.5 from GGSS Ghari Phul Gran to GGSS Havelian vide impugned transfer order dated 03.09.2020. Copy of impugned transfer order dated 03.09.2020 is attached as Annexure "C".

5. That the appellant filed departmental appeal against the impugned transfer order to respondent No.1 vide departmental application bearing diary No. 5630 dated 01/10/2020 but of no avail. Copy of

departmental dated appeal 01/10/2020 is attached as Annexure "D". Therefore, the instant service appeal is filed inter alia on the following grounds.

GROUNDS:-

- a. That impugned transfer order is illegal against the law as well as against E-transfer, policy, discriminatory, perverse and the impugned transfer dated 03.09.2020 to the extent of respondent No.5 is liable to be set aside.

- b. That it is a sorrow state of affairs that respondent No.5 has been transferred the against post of History Cum Civics having a degree of Pakistan Study which is in other words is called a wrong posting. Therefore the appellant having degree in history Cum Civics is eligible to be posted in place of respondent No.5.

- c. That the respondents' department has used a sledge hammer to crack the nut which destroyed savory of the nut, when nut cracker is available crack the nut.
- d. That it has now been settled by Apex Court, that when law prescribed a thing which is to be done in a particular manner that must be done in that manner and not otherwise. The respondents with malafide intentions are defeating the rights of the appellant. The posting/ transferred of respondent No.5 is wrong posting which is not maintainable at law.
- e. That the Honourable Tribunal should not fold up its hands while granting relief to the aggrieved party. Besides, respondent No.5 is blue eyed and particularly an influential employee. Therefore, the impugned transferred

order dated 03.09.2020 is particularly motivated and the same is liable to be cancelled.

f. That respondents' department has led the appellant to the place which is utterly unknown, to the principle of jurisprudence, natural justice, fair play and good governance. The impugned transfer order to the extent of respondent No.5 is a result of cherry picking and a wrong posting against the post of History Cum Civics which is nullity in the eye of law.

g. That the matter relates to the terms and conditions of service, therefore, the Honourable Tribunal has jurisdiction to entertain the instant service appeal of the appellant being within the period of limitation.

It is, therefore, humbly prayed that on acceptance of the instant service appeal, impugned transfer order dated 03/09/2020 to the extent of respondent No. 5 may graciously be set aside and respondents may be directed to transfer the appellant from G.G.H.S.S No. 2 to G.G.H.S.S Havelian District Abbottabad. Any other relief which this Honourable Tribunal deem appropriate in the circumstances of the case may also be granted to the appellant.



...APPELLANT

Dated: 30/12 /2020

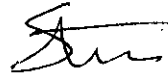
Through



(Muhammad Arshad Khan Tanoli)
Advocate High Court, Abbottabad

VERIFICATION:-

Verified on oath that the contents of foregoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal



...APPELLANT

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

Appeal No. _____/2020

Mst. Shakila Bibi, Senior Subject Specialist (History Cum Civics)
G.G.H.S.S No. 2 Mansehra.

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa through Chief Secretary K.P, Peshawar &
others.

...RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, *Mst. Shakila Bibi, Senior Subject Specialist (History Cum Civics)*
G.G.H.S.S No. 2 Mansehra, do hereby solemnly affirm and declare that the
contents of forgoing appeal are true and correct to the best of my knowledge
and belief and nothing has been concealed therein from this Honourable
Court.




DEPONENT

Answer - "A"

P-10

E-Transfer Application Form
Elementary & Secondary Education Department
Government of Khyber Pakhtunkhwa

Application No. 5523

A. Personal Information

1. Name Shakila bibi 2. Father/Guardian Mushtaq Ahmed
3. CNIC 1310153684460 4. Personal No 00399904
5. Date of Birth 03/07/1981
6. Highest Academic Qualification
a. Level MA/MSc b. Major Subjects IR, Political science
7. Gender Female 8. Marital Status Married
a. If married, then please mention whether your spouse is also a Government Servant(Yes/No) No
b. If Yes, Then please mention Designation, Department, Place & District of posting of your spouse.
i. Designation ii. Department
iii. Place iv. District of Posting
9. Email Address shakilafawaz1@gmail.com 10. Mobile No. 03135967876
11. District of Domicile ABBOTTABAD 12. Tehsil Havelian
13. Union Council HAVELIAN URBAN
14. Postal Address Zaffer crokery store usman bazar havelian

B. Service History

1. Are you appointed on contract/adhoc basis? No
2. Date of 1st Appointment in Education Department(dd/mm/yyyy)
3. Designation of 1st Appointment in Education Department
4. Present Posting
i. Designation Senior Subject Specialist(History/Civics) ii. BPS 18
iii. School Name GGHSS MANSEHRA NO. 2 iv. School Level Higher Secondary
v. School District MANSEHRA vi. School Tehsil MANSEHRA
vii. School UC CITY NO 3
5. Present Posting against the present Designation in the School since 18/03/2018
6. Present posting in the school since 18/03/2018

C. Scoring Indicators

1. Minimum tenure in the present/station school(Number of Years)
a. Plain Area b. Hard Area

ATTESTED
2.01
Muhammad Arshad Khalil
Advocate High Court
Office No: 33 Adjacent to
Distt Bar, Abbottabad

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2. Priorities

a. 1st Priority School 36719-GGHSS HAVELIAN

b. 2nd Priority School

3. Distance of present school to the desired school(in KM)

a. Priority 1 5.000

b. Priority 2

4. Do you have any chronic disease?

No

5. Do you have any disability?

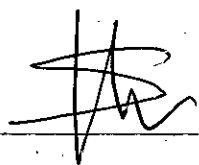
No

6. Domicile of the teacher

ABBOTTABAD

7. Is spouse posted in the district where the desired school is situated and the desired district is the domiciled district of the applicant? No

8. Annual HSSC Result (of the subject taught by the teacher) 90% or above

Applicant's Signature. 

Dated: 16/03/2020

Verified By Immediate Supervisor

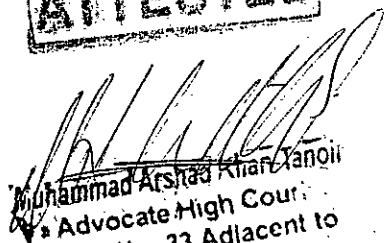
Name. _____

Designation. _____

Signature. _____

Dated: _____

ATTESTED


Muhammad Arshad Khair Tanvir
Advocate High Court
Office No. 33 Adjacent to
Dist. Bar Abbottab.

Annex-B

To
The Secretary,
Elementary Secondary Education Department,
Kyber Pakhtoon Khaw.
A 12

Subject: Appeal for the adjustment of the post
of History Com Civics Bps 18 in GCHSS
Havelian.

Sir, with due reverence it is stated that
I am working as SSS History Com Civics in
Bps 18 in GCHSS No 2 Manshera. Respectably
Sir, I have submitted applications for
the post of in GCHSS Havelian, #12, History
Com Civics Bps 18 on 20th July 2019,
Dary No 347, and on February 20th,
2020, along with online application
on 16th March reg No 5523, for above
mentioned post.

But unfortunately Mst Sadia Afsheen
Principal GCHSS Garipulman is
appointed on above mentioned

203
7/9/20

Advocate High Court
Office No: 33 Adjacent to
Dist Bar Abbottabad

RECEIVED

post for which appeal is made, through
the order number SO(S/F)E and SED/4-16/2020
posting/ Transfer TC. She was already working
in a School Tehsil Havelian which is hardly
Ten KMs from Havelian. Where as G.E.H.S No 2
Mansehra is remote station. Mst Sadra
Afreen is appointed on wrong post
against the merit. Respected Sir, through
out 12 years of My Service I have
worked on remote stations. It is requested that I kindly be
given chance on Home Station.

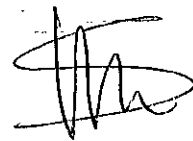
ATTESTED

Advocate High Court
Office No 33 Adjacent to
Distt Bar Abbottabad

Thank You

07/09/20

Shahida Bibi
SSS Hist con CIVIC



P-14

To

The Secretary,
Elementary and Secondary Education,
Peshawar.

Subject: REQUEST FOR ADJUSTMENT ON POST OF HISTORY COM CIVICS

Honourable Sir,

With due reverence it is stated that ever since my appointment in 2008 i have worked on remote stations. I belong to District Abbottabad. since twelve years of my service i have never worked on home station. I have requested for adjustment on post of History com Civics BPs 18 when it was vacant in GGHSS Havelian but Taslimunissa an HM is adjusted on the above mentioned post. Through the reliable resources I have come to know that she is going to retire with in a month. Respected Sir I am requesting again that I may Kindly be adjusted on the post of History cum Civics after the retirement of Taslim un Nissa.

As I Belong to district Abbotabad, it take me more than 2 hours to reach school because as i have to change three vehicles. My mother is living with me and she needs an attendant. Her medicle is attached along with application. I have to look after her because there is nobody for her care. I have three school going children and an infant baby. My present posting in GGHSS Manshra No 2 is effecting my performance badly and has also increased my tension. With my adjustment on the post History com Civics in GGHSS Havelian after the retirement of Taslim Un Nissa, I will be able to perform my duties with peace of mind and in better way.

Therefore, it is Again requested to kindly adjust me on the post of History cum Civics after the retirement of Taslimun Nissa in GGHSS Havelian Abbottabad, as it is my home station and on Humanitarian grounds as well, please.

Thank You

Dated _____

Shakila Bibi SSS
History com Civics (BPS=18)
GGHSS No 2 Manshra

ATTESTED

Muhammad Arshad Khan
Advocate High Court
Office No 33 Adjacent to
Dist Bar Abbottabad

*Applied for retirement
Post will be vacant
one or two weeks
10-02-2020*

PRINCIPAL
Govt. Girls Higher Secondary School
Havelian

*For adjustment against
the vacant post as
per policy only.*

AKBAR AYUB KHAN
Minister for E&SE
Hyder Pakhtunkhwa
09/02/2020

P-14-A

The Secretary,
Elementary and Secondary Education,
Peshawar.

Subject: REQUEST FOR ADJUSTMENT ON POST OF HISTORY COM CIVICS

Honourable Sir,

With due reverence it is stated that ever since my appointment in 2008 I have worked on remote stations. I belong to District Abbottabad, since twelve years of my service I have never worked on home station. Through the reliable resources I have come to know that the post of History com Civics (BPS-18) is lying vacant now. Respected Sir I am requesting again that I may kindly be adjusted on the post of History cum Civics as it is vacant now.

As I belong to district Abbottabad, it takes me more than 2 hours to reach school because as I have to change three vehicles. With my adjustment on the post History com Civics (BPS-18) in GGHSS Havelian, I will be able to perform my duties with peace of mind and in better way.

Therefore, it is again requested to kindly adjust me on the vacant post of History cum Civics in GGHSS Havelian Abbottabad, as it is my right that I may kindly be adjusted on my home station as throughout my service I have been working on far stations and on Humanitarian grounds as well please.

Thank You

Dated: 27/02/2020

Forwarded to the DE(CE) Ad
for further m/a please. The
Post of SS (His. cum Civics) is lying
vacant w/y 01.03.2020.
Principal
Govt Girls Higher Secondary
School Havelian Abbottabad
27/2/2020

Shakila Bibi
SSS History com Civics BPs 18
GGHSS No 2 Mansehra

TESTED

Muhammad Arshad Khan Tanoli
Advocate High Court
Office No 33 Adjacent to
Distt Bar Abbottabad

P-15

To

The Secretary,
Elementary and Secondary Education,
Khyber Pakhtoonkhwa.

Subject **REQUEST FOR ADJUSTMENT**

Respected Sir,

With due reverent, it is stated that I am working as SS BPS-18 History / Civics at Govt; Girls Higher Secondary School No 02 Mansehra, while I am a resident of Havelian District Abbottabad, I am facing too many hardships while traveling from Havelian to Mansehra and Mansehra to Havelian. A huge amount of time is spent in traveling. I have to look after sick my mother who is living with me and recently got brain hemorrhage. Although, she survived of the hemorrhage, however she requires more care and attention. Due to long distance it is neither possible for me to give proper time to my school going children nor look after my ill mother. This is not only difficult but also affecting my family as well as performance.

With regard to Govt; Girls Higher Secondary School Havelian Abbottabad, I have come to know that SS History/Civics BPS-18 Ms. Nasreen Aslam has been promoted in BPS -19 in September 2019 and is expected to be transferred. As a result, the post of History/Civics at Govt Girls Higher Secondary School shall to be vacated.

Keeping in view my domestic problems and deteriorated health of my mother, it is requested that I may please be adjusted at the vacant post in GGHSS Havelian, Abbottabad created after the promotion of MS. Nasreen Aslam to PBS-19 on humanitarian grounds please.

Dated 17/7/19

Diary No 347

ATTESTED

Muhammad Aslam
Advocate High Court
Office No 33 Adjacent to
Distt Bar Abbottabad

Yours sincerely

Shakila Bibi SS H/Civics
GGHSS No-02 Mansehra

P-16



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

Dated Peshawar the December 18th, 2019

NOTIFICATION

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

Consequent upon

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

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

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

18/12/2019

Muhammad Arshad Khan
Advocate High Court
Office No 33 Adjacent to
Distt Bar Abbottabad

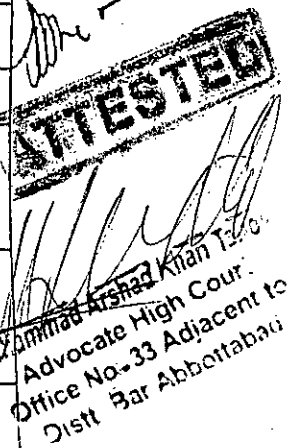
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10	Mst. Laila Tabassum	SS (BS-18) GGHSS Begum Shahabud Din Peshawar	Peshawar	Principal (BS-19) GGHSS Uterzal Kohat Against Vacant Post
11	Mst. Roolul Ain Lalqa	Principal (BS-19) GGHSS Paharpur D.I.Khan (own pay & scale)	D.I.Khan	Principal (BS-19) GGHSS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

ATTESTED

Advocate Ahmad Afshar
Office No. 33
33 Abbottabad

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

ATTESTED

 Advocate High Court
 Office No-33 Adjacent to
 Dist Bar Abbottabad

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

TESTED

Muhammad Arshad Khan Isnoh
Advocate High Court
Office No. 33 Adjacent to
Distt. Bar Abbottabad

P-20

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

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

TESTED

Muhammad Ashraf Khan, Advocate High Court
Office No. 33 Adjacent to Dist. Bar Abbottabad

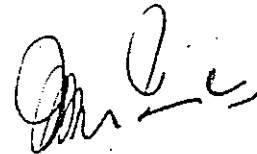
P-21

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

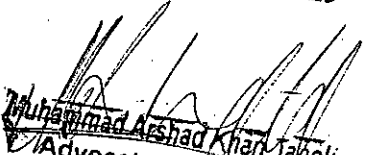
SECRETARY
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Endst: of even No. & date:

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


(AKASHA KIRAN)
SECTION OFFICER (SCHOOLS
FEMALE)

AMESTED


Muhammad Arshad Khan Taholi
Advocate High Court
Office No 33 Adjacent to
Distt Bar Abbottabad

P-22

Proposal



SPECIAL ASSISTANT TO CHIEF MINISTER
ON INDUSTRIES & COMMERCE
KHYBER PAKHTUNKHWA

ABDUL KARIM TORDHER
Subject:- **TRANSFER**

DO.NO.SACM/IND/KP/ESE
Dated Peshawar the 13-09-2019

My Dear,

Hope this letter of mine will find you in the best of your health & Spirit.

The following teaching cadre officers have requested for their transfer to the places as noted against each.

S#	Name	From	To	Remarks
1.	Shakila Bibi SS History/Civics	GGHSS No.02 Mansehra	GGHSS Havelian Abbottabad	On promotion of Ms. Nasreen Alam to BPS-18 to BPS-19
2.	Noreen SST	GGHS Dagai Gadoon Swabi	GGHSS Zalda	Against vacant post

I shall be thankful if request of the above named officers is considered in the public interest.

Regards.

Yours sincerely,

(Abdul Karim Tordher)

Mr. Zia Ullah Khan Bangash,
Advisor to Chief Minister on,
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.

ATTESTED

Muhammad Arshad Khan
Advocate High Court
Office No 33 Adjacent
Distt Bar Abbottabad

Address: 1st Floor, Ministers' Block, Civil Secretariat, Khyber Pakhtunkhwa, Peshawar
Ph: No. 091-9213859 Fax No. 091-9213863



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

Annex-C

Dated Peshawar the September 03rd 2020

NOTIFICATION

No. SO(S/E) E&SED/4-16/2020/Posting/Transfer/T.C. Consequent upon the approval of the Competent Authority, the posting/transfer of following female teachers is hereby ordered, on the posts/stations, as mentioned against each, in the best public interest, with immediate effect.

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Sr. #	Name/Designation	From	To
1.	Mst. Yasmeen Bibi, SS Islamiyat (BS-17)	GGHSS Paloona, Malakand	SS Islamiyat (BS-17) GGHSS Haryana Kot, Malakand (Against vacant post)
2.	Mst. Shakeela Raina, Headmistress (BS-17)	GGHS Ataullah Nurar, Bannu	Headmistress (BS-17) GGHS Kacha Mali Khel, D.I. Khan (Against vacant post)
3.	Mst. Shagufta Javed Instructor Physical Education (BS-17)	GGHSS Jahangira, Swabi	IPE (BS-17) GGHSS Nudch, Nowshera (Against vacant post)
4.	Mst. Asia Bibi SS Urdu (BS-17)	GGHSS Mian Kili, Dir Lower	Headmistress (BS-17) GGHSS Siddiq Abad, Bajaur (As stop gap arrangement)
5.	Mst. Sadaf Bashir Principal (BS-18)	GGHS Kaghan, Mansehra	SIPE (BS-18) GGHSS Sherwan, Abbottabad (A.V.P as stop gap arrangement)
6.	Mst. Mumtaz Bibi Principal (BS-18)	Instructor RITE (F) D.I.Khan	Principal (BS-18) GGHSS Paharpur, D.I.Khan (Vice Serial No. 7 (Mutual))
7.	Mst. Mufarrah Nosheen, Principal (BS-18)	GGHSS Paharpur, D.I.Khan	Instructor (BS-18) RITE (F), D.I.Khan (Vice Serial No. 6)
8.	Mst. Samreen Gul SS Physics (BS-17)	GGHSS Badwan, Dir Lower	SS Physics (BS-17) GGHSS Hathian, Mardan (Against vacant post)
9.	Mst. Humaira Naz Headmistress (BS-17)	GGHS Dalazak, Peshawar	Headmistress (BS-17) GGHSS Mohmand Abad, Peshawar (Against vacant post)
10.	Mst. Naheed Khan SS Pak Studies (BS-17)	Principal GGHS Spin Wana, South Wuziristan in OPS	SS Urdu (BS-17) GGHSS Parova, D.I.Khan (As stop gap arrangement)
11.	Mst. Farzana Bibi SS Chemistry (BS-17)	Unadjusted	Headmistress (BS-17) GGHS Mian Gujjar, Peshawar (As stop gap arrangement)
12.	Mst. Shazia SS Islamiyat (BS-17)	GGHS Koi Barmol, Mardan	Principal (BS-18) GGHSS Bakri Banda, Mardan (As stop gap arrangement in OPS)
13.	Mst. Lubna Toheed, Principal (BS-18)	GGHSS Koper, Mardan	Principal (BS-18) GGHSS Rustam Khel, Mardan (Vice Sr. No. 14)

03/09/2020

ATTESTED

Muhammad Arshad Khan (ano.)
Advocate High Cour
Office No 33 Adjacent to
Distt Bar Abbottabad

14	Mst. Nadia Mukhtiar SS Economics (BS-18)	Principal (BS-18) GGHSS Rüstam Khel-Mardan	Principal (BS-18) GGHSS Koper, Mardan (As stop gap arrangement)
15	Mst. Sadia Afshoon Principal (BS-18)	GGHSS Ghari Phulgran, Abbottabad	SS (History/Civics BS-18) GGHSS Lavelian, Abbottabad (As stop gap arrangement)
16	Mst. Panveer Akhtar SS Pak Studies (BS-18)	Unadjusted	Principal (BS-18) GGHSS Ghari Phulgran, Abbottabad (As stop gap arrangement)
17	Mst. Robina Naseer SS Islamiyat (BS-18)	GGHSS Shabqadar Fort, Charsadda	Principal (BS-18) GGHSS Behlola, Charsadda (As stop gap arrangement)
18	Mst. Rajuly Naz SS Statistics (BS-17)	GGHSS Badrashi, Nowshera	SS General (BS-17) GGHSS Wadpaga, Peshawar (As stop gap arrangement)
19	Mst. Lubna Rahman SST (IT) (BS-16)	GGHS Attaki, Charsadda	Subject Specialist (IT BS-17) GGHS Tarnab Farm, Peshawar (Against vacant post in OPS)
20	Mst. Aysah Noreen SST (IT) (BS-16)	GGHS Bashir Khan Qilla Umerzai, Charsadda	SS (IT BS-17) RITE (F) Rajjar, Charsadda (Against vacant post in OPS)
21	Mst. Hifsa Bibi SS Economics (BS-17)	GGHSS Nizam Pur, Nowshera	SS Pashto (BS-17) GGHSS Bilitang, Kohat (As stop gap arrangement)
22	Mst. Rehana Shabeen SS Islamiyat BS-17	GGHS Nar Shukurallah, Bannu	Headmistress (BS-17) GGHSS Dherma Khel, Bannu (As stop gap arrangement)

2. No TA/DA is allowed.

SECRETARY
ELEMENTARY & SECONDARY
EDUCATION DEPARTMENT

Endst: of even No. & date:

- Copy forwarded to the:
- Accountant General, Khyber Pakhtunkhwa, Peshawar.
- Director E&SE, Khyber Pakhtunkhwa, Peshawar.
- Director DCTE, Abbottabad.
- Additional Director, NMD, Khyber Pakhtunkhwa Peshawar.
- District Education Officers (Female) concerned.
- District Accounts Officers concerned.
- PS to Minister for E&SE, Khyber Pakhtunkhwa.
- PS to Secretary E&SE Department.
- Director EMIS, E&SE Department for uploading at official website.
- Office order file.

ATTESTED

Muhammad Arshad Khan Jano
Advocate High Court
Office No 33 Adjacent to
Distt' Bar Abbottabad

Salam
03/9/2020

(ABDUS SALAM)
SECTION OFFICER (S/E)

PS/C.S Khyber Pakhtunkhwa

Diary No. 5630

Date 01-10-2020

Annex-D

To

The Chief Secretary
Government of Khyber Pakhtunkhwa
Civil Secretariat, Peshawar

~~XXXXXXXXXX~~ P-25

Subject: Departmental Appeal Against Notification No.SO(S/F/E and ED/4-16/2020 Posting Transfer/TC dated 03/09/2020 of Mrs. Sadia Afsheen with Master in Pakistan Studies with no History subject in Graduate degree posting on SS History cum Civics at GGHSS, Hevellian.

Honorable Sir,

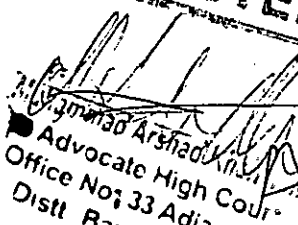
I have the honour to submit this appeal for your kind consideration and favourable action on the following facts and grounds. I am working as SS History cum Civics (BS-18) at GGHSS No.2, Mansehra since March, 2019. I have been applying properly for adjustment on a near station since July 2019 for the post of History cum Civics in GGHSS, Hevellian (copies of all requests attached), however, my requests have not been entertained by Elementary & Secondary Education department whereas Miss Sadia Afsheen has transferred to the same post which is not only against the rules and policy but also against the merit.

Respected Sir, Miss Sadia Afsheen has Master degree in Pakistan Studies and a graduate degree with Law and English literature. However, for the post of History cum Civics it is mandatory to have graduate degree with subject History. It is evident that Miss Sadia Afsheen has been posted on a wrong post of History cum Civics in GGHSS, Hevellian.

Honorable Sir, I have been serving in the far fling areas for the last 12 year. GGHSS No. Mansehra is about 3 hours travelling from my home and I have to travel through public transport whereas Miss Sadia Afsheen was working just 15 minutes travelling from her home. Despite the fact that I have made several applications (copies attached) to E & SE for posting against SS History cum Civics at GGHSS Hevellian, Miss Sadia Afsheen has been transferred to the post of SS History cum Civics at GGHSS Hevellian vide notification No.SO (S/F/E and ED/4-16/2020 Posting transfer/TC dated 03/09/2020. I believe that this transfer is not only against the rules but also against the merit.

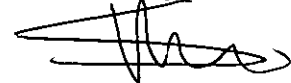
Therefore, it is humbly requested that on acceptance of this departmental appeal, you may graciously be pleased to cancel the notification No.SO(S/F/E and ED/4-16/2020 Posting Transfer/TC dated 03/09/2020 and the appellant is adjusted against the said post of History cum Civics GGHSS Hevellian as per policy and merit.

ATTESTED


Advocate Arshad Khan
Advocate High Court
Office No: 33 Adjacent to
Distt Bar Abbottabad

1/10/2020

Your Sincerely,



Shakila Bibi
SSS History Cum Civics
GGHSS No. 2, Mansehra

