



03.02.2023

Clerk of learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is not available today due to strike of lawyers. Adjourned. To come up for arguments on 03.05.2023 before the D.B.

  
(Fareeha Paul)  
Member (E)

  
(Salah-ud-Din)  
Member (J)

SCANNED  
REMOVED  
POSTER


14.11.2022

Counsel for the appellant present.

Naseer Uddin Shah, learned Assistant Advocate General for respondents present.

Learned Member (Judicial) is on leave, therefore, arguments could not be heard. Adjourned. To come up for arguments on 02.01.2023 before D.B

SCANNED  
KPST  
Peshawar

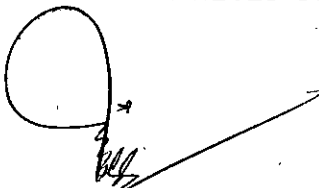
  
(Fareeha Paul)  
Member (E)

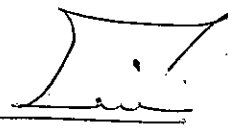
02.01.2023

Junior of learned counsel for the appellant present. Mr. Muhammad Faheem, Assistant alongwith Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

SCANNED  
KPST  
Peshawar

Junior of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is not available today. Adjourned. To come up for arguments on 03.02.2023 before the D.B.

  
(Mian Muhammad)  
Member (E)

  
(Salah-ud-Din)  
Member (J)

28.02.2022

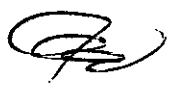
Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 02.06.2022 for the same as before.

  
Reader

2-6-2022

Proper DB not available, the case is adjourned to 16-8-2022

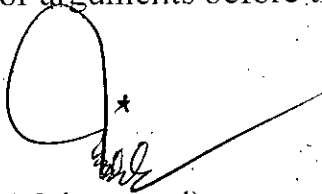
16-8-22

Due to summer vacation the case is adjourned to 21-10-22 for the same.  
Reader  


21.10.2022

Clerk of learned counsel for the appellant present. Mr. Muhammad Jan, District Attorney for the respondents present.

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is not available today due to strike of lawyers. Adjourned. To come up for arguments before the D.B on 14.11.2022.



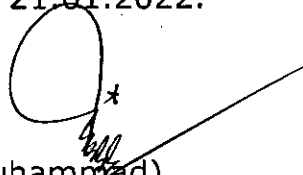
(Mian Muhammad)  
Member (E)



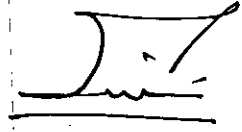
(Salah-ud-Din)  
Member (J)

29.10.2021

Clerk of learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present and sought time for submission of reply/comments. Last opportunity given. Adjourned. To come up for submission of reply/comments as well as arguments before the D.B on 21.01.2022.



(Mian Muhammad)  
Member (E)



(Salah-Ud-Din)  
Member (J)

21.01.2022

Junior to counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl. AG for respondents present.

Former made a requested for adjournment on the ground that senior counsel for the appellant is busy before Hon'ble Peshawar High Court, Peshawar. Adjourned. To come up for arguments before the D.B on ~~28.02~~ 2022.



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



Chairman

12.04.2021

Due to demise of the Worthy Chairman, the Tribunal is non-functional, therefore, case is adjourned to 27.04.2021 for the same as before.

  
Reader

27.04.2021

Due to demise of the Worthy Chairman the Tribunal is defunct, therefore, case is adjourned to 17.06.2021 for the same as before.

  
READER

17.06.2021

Junior to counsel for the appellant and Mr. Kabirullah Khattak, Addl. AG for respondents present.

Learned AAG seeks time to submit reply/comments. He is required to contact the respondents for submission of written reply/comments in office within 10 days, positively. If the written reply/comments are not submitted within the stipulated time, the office shall submit the file with a report of non-compliance. File to come up for arguments on 29.10.2021 before the D.B.

*Stipulated period has passed and reply has not been submitted.*

  
Chairman

P.S

01.07.2021

Learned Addl. A.G be reminded about the omission and for submission of Reply/comments within extended time of 10 days.



  
Chairman

26.02.2021

Appellant with counsel present. Preliminary arguments heard.


SCANNED  
KPST  
Peshawar

Instant appeal is admitted to regular hearing subject to all just exceptions. The appellant is directed to deposit security and process fee within ten 10 days, thereafter notice be issued to the respondents for submission of written reply/comments on 24.03.2021 before S.B

Appellant Deposited  
Security & Process Fee

05/3/21

Alongwith the appeal, there is an application for release of salary of the appellant. Notice of the said application be also issued to the respondents for the date fixed.

  
(Atiq Ur Rehman Wazir)  
Member (E)

24.03.2021

Junior to counsel for appellant present.

Kabir Ullah Khattak learned Additional Advocate General alongwith Syed Nasir ud Din Assistant for respondents present.

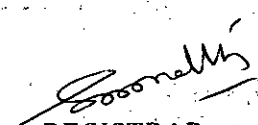
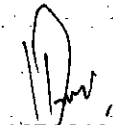

Written reply was not submitted. Representative of respondents made a request for time to furnish reply/comments; granted. To come up for written reply/comments on 12/04/2021 before S.B.

  
(Rozina Rehman)  
Member (J)

## FORM OF ORDER SHEET

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

Case No.- 184 /2021


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	11/01/2021	<p>The appeal of Myr Shaista Begum resubmitted today by Mr. Zartaj Anwar Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	12.02.2021	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>12/02/21</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>Junior to counsel for appellant present.</p> <p>Due to general strike of the bar, case is adjourned. To come up for preliminary hearing on <u>26.02.2021</u> before S.B.</p> <p style="text-align: right;"> (Rozina Rehman) Member (J)</p> <p style="text-align: right;">01.06.2021</p>

The appeal of Mst. Shaista Begum ASDEO Shabqadar district charsadda received today i.e. on 24.12.2020 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copies of statement of appellant mentioned in para-5 of the memo of appeal are not attached with the appeal which may be placed on it.
- 2- Copy of departmental appeal is not attached with the appeal which may be placed on it.
- 3- Copy of impugned order is not attached with the appeal which may be placed on it.
- 4- Annexures of the appeal are not in sequence which may be annexed serial wise as mentioned in the memo of appeal.
- 5- Annexures of the appeal are illegible which may be replaced by legible/better one.
- 6- Appeal has not been flagged/marked with annexures marks.
- 7- Annexures of the appeal may be attested.
- 8- Six more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 4120 /S.T,

Dt. 20/12 /2020

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr.Zartaj Anwar Adv. Pesh.

*Sr.*

*Resubmitted after receiving objection.  
Means put up for court*

*411*  
*Alcutt*  
*11/1/2021*



**BEFORE THE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. 184 / 2020

Shaista Begum, ASDEO (female) Shabqadar 1, district Charsadda.

(Appellant)

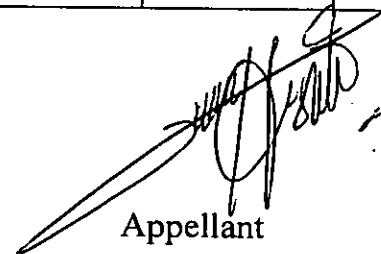
VERSUS

Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar, and others.

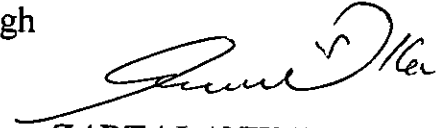
(Respondents)

**INDEX**

S. No	Description of documents	Annexure	Page No
1	Memo of appeal		1 - 7
2.	Copies of the inquiry reports	A	8 - 21
	Copies of transfer orders and departmental representation	B	22 - 30
3	Copy of the Departmental appeal dated 28.08.2020	C	31
4	Other documents	D	32 - 44
5	Vakalatnama		45

  
Appellant

Through

  
**ZARTAJ ANWAR**  
Advocate, Peshawar

**BEFORE THE KHYBER PAKHTUNKWA  
SERVICE TRIBUNAL PESHAWAR**

Khyber Pakhtunkhwa  
Service Tribunal

Service Appeal No. \_\_\_\_\_ / 2020

Diary No. 16912

Dated 24/12/2020

Shaista Begum, ASDEO (female) Shabqadar 1, district Charsadda.

(Appellant)

**VERSUS**

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Female) Charsadda.
4. Sub District Education Officer (Female) Shabqadar.

(Respondents)

Service Appeal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974, against not releasing the salary of the appellant w.e.f June 2020 till date and onwards, and the pre mature transfer of the appellant against which the departmental appeal dated 28.08.2020 despite the lapse of 90 days statutory period.

**Filed to day**  
**Registrar**

Prayer in appeal

On acceptance of this appeal the respondents may kindly be directed to release the salary of the appellant w.e.f June 2020, till date and onwards and respondents may kindly be restrained from pre mature transfers which is against the posting transfer policy and the secure and granted rights of the appellant with all back benefits and arrears, with further direction not to harass and humiliate the appellant.

Respectfully submitted,

1. That the Appellant initially joined education department as PST in year 1995, While performing duties, served the department for a decade with great zeal and devotion, Became ADO/SET through Public Service Commission in the year 2005.
2. That in the year 2011 the management cadre was segregated from the teaching cadre and Management cadre was introduced in education department, Appellant while serving as ADO/SET applied in service to the post of ADO BPS-16 through public service commission in management cadre, when found fit and eligible the commission duly recommended her as District Education Officer (F) Charsadda in the year 2011.
3. That the Appellant while performing her duties since her appointment in management cadre at various district with zeal and devotion to the entire satisfaction of the superiors without any complaint what so ever.
4. That the appellant while serving at various station performed her duties to the entire satisfaction of the high-up's and also posted ASDEO (F) circle Shabqadar 01, where she deliver up to the mark, but due the colorful exercise of power of respondent no 4, while issuing some unlawful orders by stopping the salaries of the appellant.
5. That department of some so called allegations upon which inquiries were conducted and in all these inquires the appellant was exonerated and declare her innocent but respondent no 4 due her personal grudges and professional jealousy stop the salaries of the appellant, however neither any formal order has been passed and without any legal justification stop the salaries of the appellant since June 2020. **(Copies of the inquiry reports are attached as Annexure A)**
6. That the appellant throughout agitated the matter of her release of salary but to no avail, she also filed applications to the Respondents, however the salary of the appellant has not been released.
7. That the appellant was time and again pre mutually transferred from one station to other i.e she was transferred posted at directorate of education as Assistant Director in the year 2019 but in no time vide transferred latter dated 14.3.2019 transferred from the directorate of education to Circle Shabqadar as ASDEO (f).

and thereafter against the posting transfer policy has not completed the normal tenure of posting i.e 3 years retransferred as ASDEO circle Charsadda on 23.06.2020, upon such illegal transfer order the appellant made representation to the competent authority which was accepted and send back / withdraw the previous transfer order and retransferred on 23.07.2020 to circle Shabqadar but astonishingly ion violation of law and policy just to harass the appellant and accommodated their blue eyed one issued another illegal order of transfer dated 28.07.2020 to Charsadda Khas. **(Copies of transfer orders and departmental representation are attached as annexure B)**

8. That as a last resort the appellant submitted her departmental appeal dated 28.08.2020. Thereafter the appellant waited for the outcome of her departmental appeal but the same has also not been responded the lapse of 90 days hence the instant appeal. **(Copy of the Departmental appeal dated 28.08.2020 is attached as Annexure C)**
9. That the appellant prays for the acceptance of her appeal inter alia on the following grounds:

#### **GROUND OF SERVICE APPEAL**

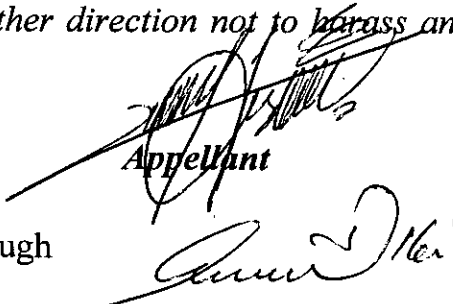
- A. That the appellant has not been treated in accordance with law, hence her rights secured and guaranteed under the law are badly violated.
- B. That the appellant has never been proceeded against, nor any charge sheet or show cause notice has ever been served upon her, moreover the services of the appellant has not been terminated thus she is entitled for the release of her salary.
- C. That withholding of salary amounts to punishment albeit without any Charge Sheet or Show Cause Notice salary of the appellant has been stopped.
- D. That the appellant has been denied of her livelihood, which amounts to violation of Article 4 of the Constitution of Islamic Republic of Pakistan, 1973.
- E. That since the services of the appellant has not been terminated, therefore she is still on the strength of the department, thus being civil servant the appellant is entitled for the salary of her post.

- F. That the appellant was time and again pre mutually transferred from one station to other i.e she was transferred posted at directorate of education as Assistant Director in the year 2019 but in no time vide transferred letter dated 14.3.2019 transferred from the directorate of education to Circle Shabqadar as ASDEO (f) and thereafter against the posting transfer policy has not completed the normal tenure of posting i.e 3 years retransferred as ASDEO circle Charsadda on 23.06.2020, upon such illegal transfer order the appellant made representation to the competent authority which was accepted and send back / withdraw the previous transfer order and retransferred on 23.07.2020 to circle Shabqadar but astonishingly ion violation of law and policy just to harass the appellant and accommodated their blue eyed one issued another illegal order of transfer dated 28.07.2020 to Charsadda Khas.
- G. That husband of the appellant is also serving as SPST at GPS Shabqadar being heart Patient who cannot travel for long distance, keeping in view such a situation the appellant also request the competent authority under the spouse policy to keep her at Shabqadar station to look after her husband due to his health condition, whereas the law also entitle her under the same policy.
- H. That the appellant is continuously approaching the concerned competent authority about the illegal acts of the respondent no 4 by stopping the salaries since June 2020 till now.
- I. That not releasing salary of the appellant is also violation of section 4 of the Khyber Pakhtunkhwa Civil Servants Act, 1973, besides violation of her fundamental rights guaranteed and secured to her under the Constitution of Pakistan, 1973.
- J. That the appellant throughout agitated the matter of the release of her salary and continuously approached the Respondent department, however her salary has not been released till date. Since denial of monthly salary to the appellant is a continuous wrong thus being recurring cause of action no period of limitation is attracted to the instant case.
- K. That withholding of salary amounts to penalty, albeit without any charge sheet or show cause notice the salary of the appellant has been withheld.

- L. That the appellant has never committed any act or omission which could be termed as misconduct, moreover the so called inquires conducted also exonerated the appellant from the allegation/charges.
- M. That the Husband of the appellant is heart Patient and under treatment at (AFIC/NIHD) Rawalpindi and due non payment of salaries she cannot take her husband to hospital for routine checkup, moreover the appellant has no other source of income, due to the withholding of her salary her whole family is thus suffering.
- N. That the appellant seeks permission of this Honourable court to rely on additional grounds at the time of hearing of the appeal.

*It is therefore prayed that On acceptance of this appeal the respondents may kindly be directed to release the salary of the appellant w.e.f June 2020, till date and onwards and respondents may kindly be restrained from premature transfers which is against the posting transfer policy and the secure and granted rights of the appellant with all back benefits and arrears, with further direction not to harass and humiliate the appellant.*

Through

  
**ZARTAJ ANWAR**  
 Advocate, High Court.

**AFFIDAVIT**

I, Shaista Begum, ASDEO (female) Shabqadar 1, district Charsadda, do hereby solemnly affirm and declare on oath that the contents of the above noted appeal are true and correct to the best of my knowledge and belief and that nothing has been kept back or concealed from this Honourable Tribunal.

  
 Deponent

**BEFORE THE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. \_\_\_\_\_ / 2020

Shaista Begum, ASDEO (female) Shabqadar 1, district Charsadda.

(Applicant)

VERSUS

Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar, and others.

(Respondents)

**APPLICATION FOR RELEASING THE CURRENT  
SALARY OF THE APPELLANT.**

Respectfully Sheweth:

1. That the Applicant while performing her duties since her appointment in management cadre at various district with zeal and devotion to the entire satisfaction of the superiors without any complaint what so ever.
2. That the applicant while serving at various station performed her duties to the entire satisfaction of the high-up's and also posted ASDEO (F) circle Shabqadar 01, where she deliver up to the mark, but due the colorful exercise of power of respondent no 4, while issuing some unlawful orders by stopping the salaries of the applicant.
3. That the applicant has never been proceeded against, nor any charge sheet or show cause notice has ever been served upon her, moreover the services of the applicant has not been terminated thus she is entitled for the release of her salary.
4. That withholding of salary amounts to punishment albeit without any Charge Sheet or Show Cause Notice salary of the applicant has been stopped.

5. That the Husband of the applicant is heart Patient and under treatment at (AFIC/NIHD) Rawalpindi and due non payment of salaries she cannot took her husband to hospital for routine checkup, moreover the applicant have no other source of income, due to the withholding of her salary her whole family is thus suffering.

It is therefore most humbly prayed that on acceptance of this application the respondents may kindly be directed to release the current salary of the applicant.

Applicant

Through

ZARTAJ ANWAR  
Advocate, Peshawar

**AFFIDAVIT**

I, Shaista Begum, ASDEO (female) Shabqadar 1, district Charsadda, do hereby solemnly affirm and declare on oath that the contents of the above noted application are true and correct to the best of my knowledge and belief and that nothing has been kept back or concealed from this Honourable Tribunal.

Deponent



8

ANNEX "A"

The Deputy Commissioner,  
Charsadda

SUBJECT: THREATS/HARASSMENT  
R/Sir.

It is to draw your kind attention towards a very serious matter that Mr. Sohail PST GPS Shabqadar husband of Mst: Shaista begum then ASDEO (F) Circle Shabqadar (transferred to Circle Charsadda but not handing over charge) came to office of the undersigned along with Mr. Farrukh Sair Chowkidar Circle Shabqadar (Brother of Mst: Shaista Begum) and 03 other persons having guns on Saturday 18/07/2020 about 03:00 pm and started giving ultimatums, warnings and threats regarding serious consequences. He said that he along with the others is here for physical violence of the staff of this office, and he won't let anyone work in this office including the undersigned showing aggression, this all happened in front of Mr. Qaiser Hussain N/Q of this office.

The motive behind this criminal offence by the above named person is that his wife was working as incharge SDEO (F) Tehsil shabqadar with dual charge of Circle office too for a long time meanwhile the undersigned was posted as SDEO (F) on original post and Mst: Shaista was once again posted as ASDEO (F) Circle Shabqadar on her original post. The undersigned start working and found lots of irregularities which were done in the period of their incharge SDEO (F)/ASDEO (F) quoted above.

It is further mentioned that the above said person was continuously harassing my staff to misguide the undersigned and do not work with honesty and loyalty, on the refusal it resulted that he came along with Mr. Farrukh sair Chowkidar & 03 other peoples and performed criminal actions. The undersigned luckily departs along with both of staff members to office of D.E.O (F) Charsadda for official work otherwise it would have been resulted as a serious and dangerous end as they were there with bad intentions & having guns.

It is further mentioned that when he found absent both officials in office, he talked to Mr. Zahoor Jan S/C of this office through telephone and threatened him also & told him about his intentions & said that a huge amount has been recovered by him which has to be paid back by both of you. He further made telephonic call to Mr. Musawir Iqbal J/C of this office and warned him about the serious consequences, physical violence and threatened him to life giving references of persons fully armed & also said about the amount that has been recovered from him, he further warned that he will not let us relaxed until his demands not accepted.

It is therefore requested to kindly take serious actions because in such environment it is impossible for the undersigned and for other staff members to perform duties in office. It is further added that any kind of miss-hap, physical violence or life loss of any one of us all the responsibilities may fixed on the above said persons. It is necessary to mentioned that he also warned that if this issue taken to the high ups his revenge will be very horrible and he will not let any one of us relaxed.

It is repeatedly stated that in case of any kind of miss-hap, physical violence and life loss he may be held responsible.

*[Signature]*  
SUB-DIVISION EDUCATION OFFICER  
(FEMALE) SHABQADAR

Endstt No. \_\_\_\_\_

Copy to the:

1. District Education Officer (F) Charsadda with the request to kindly direct Mst: Shaista Begum to stop such actions by her husband.
2. P.A to Director, E&SED Khyber Pakhtunkhwa Peshawar.
3. Office file

*Forwarded to DEO (M) & DEO (F)*  
*[Signature]*

4796  
235  
SUB-DIVISION EDUCATION OFFICER  
(FEMALE) SHABQADAR

The Deputy Commissioner,  
Charsadda

SUBJECT: THREATS/HARASSMENT  
R/Sir,

It is to draw your kind attention towards a very serious matter that Mr. Sohail PST GPS Shabqadar husband of Mst Shaista Begum then ASDEO (F) Circle Shabqadar (transferred to Circle Charsadda but not handing over charge) came to office of the undersigned along with Mr. Farrukh Sair Chowkidar Circle Shabqadar (Brother of Mst Shaista Begum) and 03 other persons having guns on Saturday 18/07/2020 about 03:00 pm and started giving ultimatums, warnings and threats regarding serious consequences. He said that he along with the others is here for physical violence of the staff of this office, and he won't let anyone work in this office including the undersigned showing aggression, this all happened in front of Mr. Qaiser Hussain N/Q of this office.

The motive behind this criminal offence by the above named person is that his wife was working as Incharge SDEO (F) Tehsil shabqadar with dual charge of Circle office too for a long time meanwhile the undersigned was posted as SDEO (F) on original post and Mst Shaista was once again posted as ASDEO (F) Circle Shabqadar on her original post. The undersigned start working and found lots of irregularities which were done in the period of then incharge SDEO (F)/ASDEO (F) quoted above.

It is further mentioned that the above said person was continuously harassing my staff to misguide the undersigned and do not work with honesty and loyalty, on the refusal it resulted that he came along with Mr. Farrukh Sair Chowkidar & 03 other peoples and performed criminal actions. The undersigned luckily departs along with both of staff members to office of D.E.O (F) Charsadda for official work otherwise it would have been resulted as a serious and dangerous end as they were there with bad intentions & having guns.

It is further mentioned that when he found absent both officials in office, he talked to Mr. Zahoor Jan S/C of this office through telephone and threatened him also & told him about his intentions & said that a huge amount has been recovered by him which has to be paid back by both of you. He further made telephonic call to Mr. Musawir Iqbal I/C of this office and warned him about the serious consequences, physical violence and threatened him to life giving references of persons fully armed & also said about the amount that has been recovered from him, he further warned that he will not let us relaxed until his demands not accepted.

It is therefore requested to kindly take serious actions because in such environment it is impossible for the undersigned and for other staff members to perform duties in office. It is further added that any kind of miss-hap, physical violence or life loss of any one of us all the responsibilities may fixed on the above said persons. It is necessary to mentioned that he also warned that if this issue taken to the high ups his revenge will be very horrible and he will not let any one of us relaxed.

It is repeatedly stated that in case of any kind of miss-hap, physical violence and life loss he may be held responsible.

SUB-DIVISION EDUCATION OFFICER  
(FEMALE) SHABQADAR

Endstt No. 1446-47 1-9-

Copy to the:

1. District Education Officer (F) Charsadda with the request to kindly direct Mst Shaista Begum to stop such actions by her husband.
2. P.A to Director E&SED Khyber Pakhtunkhwa Peshawar.
3. Office File

20-17-2020  
SUB-DIVISION EDUCATION OFFICER  
(FEMALE) SHABQADAR

Scanned with CamScanner

Add: Chowk Hashtrani City Mart

Scanned with CamScanner

SUB-DIVISION EDUCATION OFFICER  
(FEMALE) SHABOADAR  
20-17-2022

*Handwritten notes:*  
0846 9858153  
K...  
K...  
K...  
K...

1. District Education Officer (F) Charasada with the request to kindly direct Mac Shasta Begum to stop such actions by her husband.
2. P.A to Director EkSED Khyber Pakhtunkhwa Peshawar.
3. Office File.

Endst No. 1446-47  
SUB-DIVISION EDUCATION OFFICER  
(FEMALE) SHABOADAR

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he will not let any one of us relaxed.  
It is repeatedly stated that in case of any kind of miss-hap, physical violence and  
life loss he may be held responsible.

10

C1

**OFFICE OF THE  
DEPUTY COMMISSIONER  
CHARSADDA**

No. DC(CHD)(AG-I)/2(9)/Education/

4450-51

Dated: August 28, 2020

To

The District Education Officer (F),  
Charsadda.

Subject: THREATS/HARASSMENT.

Enclosed is a copy of District Education Officer (M), Charsadda letter No.8358 dated: 27/08/2020 along with its enclosures on the subject noted above for further necessary action please.



DEPUTY COMMISSIONER,  
CHARSADDA

Even No & Date:

Copy forwarded to the District Education Officer (M), Charsadda w/r to his letter quoted above for information only.



DEPUTY COMMISSIONER,  
CHARSADDA

OFFICE OF THE DISTRICT EDUCATION OFFICER  
(MALE) CHARSAKDA

11

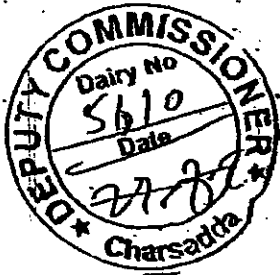
No. 8358 /Dated 27/8/2020

To

The Deputy Commissioner,  
Charsakda.

SUBJECT:- THREATS/HARASSMENT.  
Memo

I am to refer to your office memo No.DC(CHD)/(AG-1)2(9) Education/ 3755-58 dated 23.07.2020 and to enclosed herewith enquiry report received from enquiry officers along with statements of the staff and others for onward submission to the District Education Officer (Female) Charsakda for taking appropriate action in the light of recommendation of the enquiry officers



DISTRICT EDUCATION OFFICER  
(MALE) CHARSAKDA

DC	
ADC	
Branch	G.B.
Date	27/8/20

*Handwritten notes:*  
For Justice necessary action  
to DED (F)

## ENQUIRY REPORT

### ENQUIRY COMMITTEE

1. Mst: Azhar Jan Principal GGHS Rajjar (Chairperson)
2. Mr. Hashmat Ali Vice Principal GHSS Sherpao (Member)
3. Muhammad Shabeer Headmaster GHS Dheri Zardad (Member)

### Nature of Enquiry

To probe in to the matter that harassment / threats to staff of SDEO (F) Shabqadar from Mr Sohail SPST husband of Mst Shaista Begum ASDEO(F) circle Shabqadar is based on facts or it is baseless Ref to SDEO(F) Shabqadar Fort letter No 1445 dated :20-7-2020 addressed to Deputy Commissioner Charsadda.

### Venue of Enquiry.

- 1- Office of SDEO (F) Shabqadar Fort.
- 2- Office of the ASDEO Circle Shabqadar Fort.
- 3- Office of Principal GGHS Rajar.

### Data Collection Tools:

Interviews and Questionnaires.

### Method and Procedures:

The enquiry Committee visited SDEO(F) office Shabqadar and ASDEO Circle Office Shabqadar on Aug 11 2020. All the concerned Officials Mst Kulsoom Syed SDEO (F), Mst Shaista Begum ASDEO(F), Mr Zahoor S/C, Mr Mussawar Iqbal J/C .Qaisar Husain (NQ) and Farrukh Sair Chowkidar were interviewed in detail. In addition to the interview written questionnaires were also served upon them. To these questionnaires they wrote down their responses. (Questionnaire are attached).

### Findings.

- 1- Mst Kalsoom Syed SDEO (F) Shabqadr stated in her interview that she had forwarded the letter to Deputy Commissioner Charsadda as they felt unsecured due to visit of Mr Sohail along with other irrelevant persons.
- 2- Perusal of all the statements confirmed that Mr Sohail PST GPS -2 SKF and Farrukh Sair Chowkidar Circle Office ASDEO(F) SKF along with irrelevant persons had visited the SDEO(F) Office on July, 18 2020.

denied the allegations leveled against him and stated that he had visited the office to some misconceptions with Mr Zahoor S/C and Mr Mussawar Iqbal J/C.

The statement of Mr Mussawar Iqbal shows that Mr Sohail pressurized him through phone call that he is involved in the transfer of Mst Shaista Begum. he also told that through another outsider, Mr Sohail has demanded seven lac from him. The same fact has been confirmed by Mr Zahoor S/C in his written Statement. This monetary affair has already been resolved by the department for which Mr mussawar Iqbal is being blamed (But Mr Sohail has denied these charges in his statement and interview)

- 5- Mst Shaista Begum ASDEO (F) has transferred to charsadda but she has submitted an appeal to high ups for cancellation of her transfer order therefore, she has not taken charge till this time at circle office Charsadda.

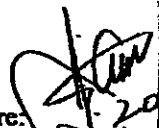
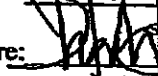
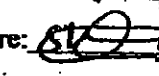
### CONCLUSION:

It is observed that misunderstandings have been developed between these two offices i.e. SDEO (F) and ASDEO (F) and these officials have become diffident for each other. Which is not in favour of the department.

### Recommendations.

1. Security of the SDEO (F) office may be ensured by the department.
2. The concerned (Mst Shaista Begum ASDEO (F) may be directed to obey the departmental orders in letter and spirit.
3. In future for smooth functioning/running of both offices, re-shuffling of staff may be made on merit / as per rules.

### ENQUIRY COMMITTEE

- |   |               |  |
|---|---------------|--|
| 1. Mst: Azhar Jan Principal GGHS Rajjar         | (Chairperson) | Signature:  20/10/202 |
| 2. Mr. Hashmat Ali Vice Principal GHSS Sherpao  | (Member)      | Signature:  20/10/202 |
| 3. Muhammad Shabeer Headmaster GHS Dheri Zardad | (Member)      | Signature:  20/10/202 |

14



**Government of Khyber Pakhtunkhwa**  
**OFFICE OF THE DISTRICT POLICE OFFICER**  
**CHARSADDA**

**Tel: 0919220400 Fax: 0919220401**

No. 2382/GB dated Charsadda the 30/09/2020  
To,

The Deputy Commissioner,  
Charsadda.

Subject: - THREATS/HARASSMENT.

**Memo:**

Please refer to your office letter No. DC(CHD)/(AG-I)/2(9)/Education/  
3755-58 dated 23.07.2020 on the subject noted above.

As per report of DSP Shabqadar it is intimated that both the parties are  
serving in education department. Respondent party did not threaten SDEO,  
Shabqadar and only altercation between both clerks occurred on mobile phone.  
A departmental enquiry has been initiated by the department in which both were  
declared innocent, please.

Encl:(AA)

**Muhammad Shoaib Khan (PSP)**  
District Police Officer,  
Charsadda

6





15  
GOVERNMENT OF KHYBER PAKHTUNKHWA,  
OFFICE OF THE DY: SUPERINTENDENT OF POLICE,  
SHABQADAR

PH: 091-6281302

EMAIL: DSPSHABQADAR@GMAIL.COM

No. 834 /S, dated Shabqadar the 23/09/2020

To,

The Worthy District Police Officer,  
Charsadda.


Subject: THREAT/HARASSMENT.

Memo:

Kindly refer to your office diary No. 3180/GB, dated 29-07-2020.

Respected Sir,

According to the report of SHO Shabqadar, that both parties are serving in Education department, respondent party did not threaten SDEO, Shabqadar, whoever, altercation with both clerks has been made on mobile phone, in regard to which a departmental enquiry has been initiated; in which both were declared innocence (copy of departmental enquiry is attached), please.

  
Dy: Superintendent of Police,  
Shabqadar.

SUB-DIVISION EDUCATION OFFICE  
(FEMALE) SHABQADAR  
No. 1454 / Dated 28/07/2020

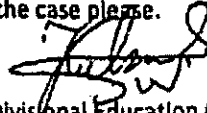
To, The Director E&SE,  
Khyber Pukhtunkhwa,  
Peshawar.  
SUBJECT: NOT HANGING OVER CHARGE/DISOBEDIENCE

Kindly refer to the Notification No. 6335-37/A-17/Transfer/Charsadda dated 23/06/2020 vide your worthy office and to state that Mst: Shaista begum ASDEO (F) Circle Shabqadar-I has been transferred as ASDEO (F) Circle Charsadda in the said order. It is further mentioned that rest of ASDEO (F) who transferred from one to another Circle complied the orders and join their new duty stations except the above named ASDEO (F). It is further stated that the undersigned issued letters to the said ASDEO (F) for charge relinquish/departure bearing No. 1423 dated 03/07/2020 & 1427 dated 08/07/2020 but both were ignored by the her and did not submitted her reply in case of any. The undersigned received a copy of letter No. 439 dated 08/07/2020 vide SDEO (F) Charsadda where she requested to inform the concern to report. The undersigned further submitted letter No. 1432 dated 13/07/2020 to DEO (F) Charsadda with the request to direct the concern to handover charge for the smooth running of this office but in vein.

It is pertinent to mention that during all this correspondence <sup>of S.F. member</sup> Mr. Sohail Ahmad (husband of Mst: Shaista begum ASDEO) along with Mr. Farrukh Chowkdar Circle Shabqadar-I (brother of Mst: Shaista begum ASDEO) and 03 other persons having guns came to this office, shown aggression & asked for both of my staff members but luckily I along with both official of my office departed to office of D.E.O (F) for some official work. The matter was reported by Mr. Qaiser Hussain N/Q of this office. He further contacted both officials through telephone on the same day and threatened them aggressively and also warned both of them about the serious consequences as they are doing their duties honestly, the matter has been reported to D.C Charsadda vide this office letter No. 1445 dated 20/07/2020 (attached). Now the undersigned has come to know that her name has been withdrawn from the order mentioned above vide your office Order No. 29198-103 dated 22/07/2020 (attached), which is quite unaffordable for the undersigned, as she is very disobedient towards official directions, problematic, creating hurdles, obstacles and now after this serious occurrence/criminal offence done by her husband and brother along with the individuals the undersigned along with her staff are suffering from great mental stress. It is further mentioned that it would be quite impossible for the undersigned to run the office smoothly in such conditions. It is also mentioned that she served rest of her service here as ASDEO (F)/ Incharge SDEO (F) Shabqadar therefore her she has complete her tenure too. It is wondering that why she do not want to assume her charge as ASDEO (F) Charsadda as this would be much convenient for her.

Your good self is therefore most humbly requested to kindly look into the matter keeping in view the facts mentioned above for the smooth running of this office please.

The undersigned is expecting your cooperation in the case please.

  
Sub-Divisional Education Officer  
Female Shabqadar

Endstr: No. \_\_\_\_\_ / Dated \_\_\_\_\_ / 2020.

- Copy of the above forwarded for information to the:
1. P.S to Secretary E&SE Khyber Pukhtunkhwa Peshawar.
  2. Deputy Commissioner Charsadda.
  3. D.E.O (F) Charsadda.
  4. Office file.

Sub-Divisional Education Officer  
Female Shabqadar

ADDE (F)  
Transfer Shaista  
to Charsadda  
case for  
disciplinary  
proceeding  
Secretary  
28/7/20

DD  
28/7/20

17

(16)

SUB-DIVISION EDUCATION OFFICE  
(FEMALE) SHABQADAR  
NO. 1445 / DATED/ 20/07/2020

The Deputy Commissioner,  
Charsadda

SUBJECT: THREATS/HARASSMENT

R/Sir,

It is to draw your kind attention towards a very serious matter that Mr. Sohail MST GPS Shabqadar husband of Mst: Shaista begum then ASDEO (F) Circle Shabqadar (transferred to Circle Charsadda but not handing over charge) came to office of the undersigned along with Mr. Farrukh Sair Chowkidar Circle Shabqadar (Brother of Mst: Shalata Begum) and 03 other persons having guns on Saturday 18/07/2020 about 03:00 pm and started giving ultimatums, warnings and threats regarding serious consequences. He said that he along with the others is here for physical violence of the staff of this office, and he won't let anyone work in this office including the undersigned showing aggression, this all happened in front of Mr. Qaiser Hussain N/Q of this office.

The motive behind this criminal offence by the above named person is that his wife was working as incharge SDEO (F) Tehsil shabqadar with dual charge of Circle office too for a long time meanwhile the undersigned was posted as SDEO (F) on original post and Mst: Shaista was once again posted as ASDEO (F) Circle Shabqadar on her original post. The undersigned start working and found lots of irregularities which were done in the period of their incharge SDEO (F)/ASDEO (F) quoted above.

It is further mentioned that the above said person was continuously harassing my staff to misguide the undersigned and do not work with honesty and loyalty, on the refusal it resulted that he came along with Mr. Farrukh sair Chowkidar & 03 other people and performed criminal actions. The undersigned luckily departs along with both of staff members to office of D.E.O (F) Charsadda for official work otherwise it would have been resulted as a serious and dangerous end as they were there with bad intentions & having guns.

It is further mentioned that when he found absent both officials in office, he talked to Mr. Zahoor Jan S/C of this office through telephone and threatened him also & told him about his intentions & said that a huge amount has been recovered by him which has to be paid back by both of you. He further made telephonic call to Mr. Musawir Iqbal J/C of this office and warned him about the serious consequences, physical violence and threatened him to life giving references of persons fully armed & also said about the amount that has been recovered from him, he further warned that he will not let us relaxed until his demands not accepted.

It is therefore requested to kindly take serious actions because in such environment it is impossible for the undersigned and for other staff members to perform duties in office. It is further added that any kind of mis-hap, physical violence or life loss of any one of us all the responsibilities may fixed on the above said persons. It is necessary to mentioned that he also warned that if this issue taken to the high ups his revenge will be very horrible and he will not let any one of us relaxed.

It is repeatedly stated that in case of any kind of mis-hap, physical violence and life loss he may be held responsible.

*[Signature]*  
20-07-2020  
SUB-DIVISION EDUCATION OFFICER  
(FEMALE) SHABQADAR

Ends!! No. \_\_\_\_\_/-

Copy to the:

1. District Education Officer (F) Charsadda with the request to kindly direct Mst: Shaista Begum to stop such actions by her husband.
2. P.A to Director E&SED Khyber Pakhtunkhwa Peshawar.
3. Office File

//  
SUB-DIVISION EDUCATION OFFICER  
(FEMALE) SHABQADAR

18

OFFICE OF THE DISTRICT EDUCATION OFFICER  
(MALE) CHARSAJDA

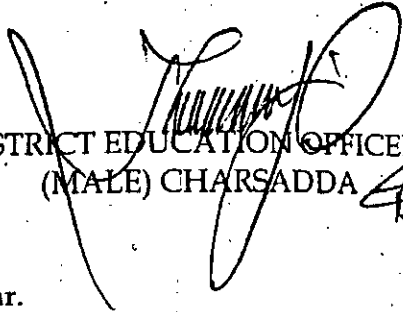
No. 12050 /Dated 02 / 10 / 2020

To

✓  
The Sub Divisional Education Officer  
(Male) Shabqadar.

SUBJECT:- NOT HANDING OVER CHARGE/ DISOBEDIENCE  
Memo

Enclosed please find herewith a photocopies of the letters received from Director E&SE Khyber Pakhtunkhwa of SDEO (Female) Shabqadar against Sohail Ahmad PST for your report/comments within 04 days.

  
DISTRICT EDUCATION OFFICER  
(MALE) CHARSAJDA

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

Copy for information to the:-

1. Director E&SE Khyber Pakhtunkhwa Peshawar.
2. Office file.

Sd-  
DISTRICT EDUCATION OFFICER  
(MALE) CHARSAJDA



**DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA PESHAWAR.**

(23)  
19

No. 4696/N. No. Complain against  
teachers.  
Dated Peshawar the 23/9/2020.

To,

The District Education Officer (M)  
Charsadda.

Subject: - NOT HANGING OVER CHARGE/DISOBEDIENCE.

Memo:-

I am directed to refer to the subject noted above and to enclose herewith a copy of complaint against the Sohil Ahmad PST District Charsadda, and to ask you to submit detail report/comments to this office within a week time.

*[Signature]*  
Assistant Director (Etab :)  
Elementary & Secondary Edu:  
Khyber Pakhtunkhwa Peshawar.  
21/9/2020

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

Copy forwarded to the:-

- 1. P.A to Director Elementary and Secondary Education local office.

Assistant Director (Etab :)  
Elementary & Secondary Edu:  
Khyber Pakhtunkhwa Peshawar.

*ADD P.S.J.*  
*Send the case to SDIEO (M) SFF  
for detailed report.*

*D. No*  
*1157*  
*01-10-2020*

No. 13602

To:

The Director,  
E&SE Khyber Pakhtunkhwa  
Peshawar.

SUBJECT:- NOT HANDING OVER CHARGE/ DISOBEDIENCE  
Memo

I am to refer to your letter No. 4696/F.No. Complaint against teachers dated 23.09.2020 on the subject cited above and to enclose enquiry report along with original written statement of Mr. Sohail Ahmad SPST GIS Shabqadar for further necessary action please

Encl. 03 copies

*Sd/-*  
DISTRICT EDUCATION OFFICER  
(MALE) CHARSADDA

Endst. No. 13602

Copy for information to the:-

1. SDEO(M) Shabqadar.
2. Office file.

*[Signature]*  
DISTRICT EDUCATION OFFICER  
(MALE) CHARSADDA



21

Office of the Sub Divisional Education Officer  
(Male) Shabqadar

No.

41048

To

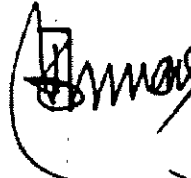
The District Education Officer  
(Male) Charsadda

Dated: 12/10/2020

**SUBJECT: REPORT ABOUT NOT HANDING OVER CHARGE/ DISOBEDIENCE**

Memo:

Referring to your office letter No.12050 dated 02-10-2020 on the subject cited above, the w/signed inquired the matter neutrally and presents a comprehensive report along with the explanation submitted by Mr. Sohail Ahmad SPST, GPS Shabqadar Fort in black and white (Original Attached). Though the issue has been vanished now but what reportedly was occurred, found to be prejudiced allegations only and can be labeled as war of ego. By examining the whole situation, the allegations found, seem to be biased and baseless. The charge report reveals that Mst. Shaista ASDEO(F) had already handed over charge of the post of ASDEO(F) Shabqadar-1 to Mst. Gul Nasreen and the former had taken over charge at the office of SDEO(F) Charsadda on 14-09-2020. Thus obeying the rules. The DPO has investigated the case of harassment and threatening and has submitted the inquiry report which has described the respondent Mr. Sohail Ahmad an innocent and the allegation leveled against him found baseless. It is worth mentioning that the alleged person in complaint Mr. Sohail Ahmad is an SPST at GPS Shabqadar fort and he has no concern with handing over charge and disobedience at all. Therefore, the undersigned would like to recommend that although the matter has already been resolved but the allegation against Mr. Sohail Ahmad and Mst. Shaista may be withdrawn please.

  
12/10/2020  
Sub Divisional Education Officer  
(Male) Shabqadar

Approved: B

**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER  
PAKHTUNKHWA PESHAWAR**

**NOTIFICATION**

The following ASDEO are hereby transferred/adjusted in their own pay and BPS in the interest of public service against the post noted against each with immediate effect:-

S.No	Name & Designation	From	To	Remarks
1	Mst. Shaista begum ASDEO	Services placed at the disposal of this Directorate	ASDEO(F) Circle Shabqadar Charsadda	A.V.P ✓
2	Mst. Shahnaz ASDEO	Services placed at the disposal of this Directorate	ASDEO(F) Circle Khwaza Khela Swat	A.V.P
3	Mst. Noreen Saba ASDEO	Services placed at the disposal of this Directorate	Services placed at the disposal of DEO(F) Tank	A.V.P

**Note:-**

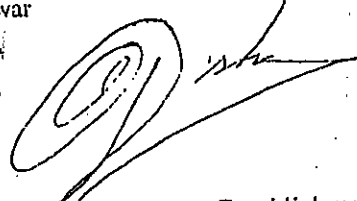
- 1- Charge report should be submitted to all concerned.
- 2- No F.A.D.A is allowed.

**Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar**

Enclst.No. 3621-30 F.No.25 A-17 SST/ADEO/ASDEO/Posting/Transfer/2019  
Dated Peshawar the 13 / 3 / 2019

Copy of the above is forwarded to the:-

- 1- Accountant General Khyber Pakhtunkhwa Peshawar
- 2- District Education Officer (M&F) Concerned
- 3- District Accounts Officer, Concerned
- 4- SDEO(F) Concerned
- 5- ASDEO Concerned
- 6- PA to Director (E&SE) Local Office.

  
**Deputy Director Establishment  
(E&SE) Khyber Pakhtunkhwa**

13/3/19

13/3/20

13/3/20



23

**DIRECTORATE OF ELEMENARY & SECONDARY EDUCATION KF  
PAKHTUNKHWA PESHAWAR**

**NOTIFICATION**

Consequent upon approval by the Competent Authority, the following ASDEO/SST are hereby transferred/adjusted on their own pay and BPS in the best interest of public service with immediate effect.

S.No	Name of ASDEO /SST	Name of Circle/Station	Transfer to	Remarks
1	Shakila Naz	Circle Tangi	Circle Mandani	A.V.P
2	Ruheela Naz	Circle Umerzai	Circle Shakardhand	A.V.P
3	Naz Gul	SST (G)	ASDEO (F) Circle Utmanzai	Vice S.No 5
4	Shaista Begum	ASDEO (F) SKF1	ASDEO Circle Charsadda	A.V.P
5	Salma	ASDEO (F) Circle Utmanzai	ASDEO (F) Circle Umerzai	Vice S.No.2

**Note:-**

- 1 Charge report should be submitted to all concerned.
- 2 No TA/DA is allowed.
- 3 Their seniority will intact in their own cadre.

**DIRECTOR**  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar

Endst No. 6335-37 /A-17/Transfer/Charsadda

Dated Peshawar the 23/6 2020

Copy of the above is forwarded to the:-

- 1 District Education Officer (F) Charsadda.
- 2 District Accounts Officer Charsadda.
- 3 PA to Director (E&SE) Local Office.
- 4 Master file.

*Hmd*  
Deputy Director-Establishment (F)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar

23/6/20



24

**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION**  
**KHYBER PAKHTUNKHWA PESHAWAR.**  
Phone: 091-9225344 Email: ddadmn.ese@gmail.com

**Office Order.**

Services of the following officials are hereby placed at the disposal of District Education Officer (Male) Charsadda for further adjustment.

S.#	Name/Design:	Present Posting	Adjustment at	Remarks
1	Mr. Zahoor Jan Senior Clerk BS-14	SDEO (F) Shabqadar Charsadda	Place of the Disposal DEO (M) Charsadda	
2	Mr. Abdul Nasar Senior Clerk BS-14	Working against AP Post at DEO (F) Charsadda	Place of the Disposal DEO (M) Charsadda	

**Note:**

1. Compliance report should be submitted to all concerned.
2. No TA/DA is allowed.

**DIRECTOR**

Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar

Endst: No. 757-61 /F.No. /A-23/MS/Charsadda Vol IV

Dated Peshawar the 28/8/2020

Copy forwarded to the: -

1. District Education Officer (Male) Charsadda.
2. District Education Officer (Female) Charsadda.
3. District Account Officer Concerned.
4. Official concerned.
5. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
6. Master File.

**Assistant Director (Admn)**

Directorate E& Secondary Education  
Khyber Pakhtunkhwa, Peshawar

For [Signature] 28/8/20



25

✓

**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION**  
**KHYBER PAKHTUNKHWA PESHAWAR.**

Phone: 091-9225344

Email: ddadmn.es@gmail.com

**Office Order.**

Services of Musawir Iqbal Junior Clerk BS-11 office of the SDEO (F) Shabqadar Charsadda is hereby placed at the disposal of District Education Officer (Male) Charsadda for further adjustment on administrative ground.

**Note:**

1. Compliance report should be submitted to all concerned.
2. No TA/DA is allowed.

**DIRECTOR**

Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar

Endst: No. 4771-76 /F.No. /A-23/MS/Inquiry Musawir Iqbal Junior Clerk  
Dated Peshawar the 23/9/2020

Copy forwarded to the: -

1. District Education Officer (Male) Charsadda.
2. District Education Officer (Female) Charsadda.
3. District Account Officer Concerned.
4. SDEO (F) Shabqadar Charsadda with the direction that the above official immediately relieved from duty.
5. Official concerned.
6. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
7. Master File.

  
**Assistant Director (Admn)**

Directorate E& Secondary Education  
Khyber Pakhtunkhwa, Peshawar

As per the proposal of SDEO (Female) Shabqadar Fort the following teachers are hereby transferred on need base, school mentioned below in the intres service with immediate effect.

S No	Name of Teacher	From	To	Remarks
01	Mst: Rokhama PST	GGPS Fatima Khel	GGPS Shara	Need Base single teacher School
02	Kiran Begum PST	GGPS Rahmat Ullah Khan	GGPS Fatima Khel	Single school teacher
03	Robama PST	GGPS Mian Killi No. 03	GGPS Mian Killi No. 01	Single school teacher

Note:

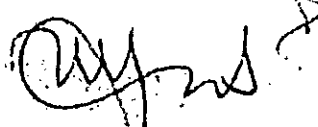
Charge Report should be submitted to all concerned. NO TA/DA is allowed.

(MISS ULFAT BEGUM )  
DISTRICT EDUCATION OFFICER  
(FEMALE) CHARSADDA.

Endstt No. 4892-99 /Dated/ 05/03/2020.

Copy for information to the:  
1. PA to Deputy Commissioner Charsadda

- 2. DMO Charsadda
- 3. BAO / Accounts Branch Local Office.
- 4. District Account officer Charsadda.
- 5. SDEO (Female) Shabqadar Fort w/r to her corrigendum letter No. 1335 Dated 05-03-2020.
- 8. ASDEO Circles Concerned.
- 09. Office Copy.

  
DISTRICT EDUCATION OFFICER  
(FEMALE) CHARSADDA.



27

✓ (2)

**DIRECTORATE OF ELEMENARY & SECONDARY  
EDUCATION KHYBER PAKHTUNKHWA PESHAWAR**

**NOTIFICATION**

The transfer / adjustment of the following ADEO/ASDEO are hereby ordered on their own pay pay and BPS in the interest of public service with immediate effect:-

S.No	Name	From	To	Remarks
1	Mst.Roheela Naz	SST(G) GGHS Wardaga Charsadda	ADEO(F) Primary Establishment o/o the DEO(F) Charsadda	A.V.P
2	Mst.Zeenat Amin	SST(G) GGHS Kot Baba Tangi	ASDEO(F) Circle Tangi Charsadda	A.V.P
3	Mst.Asia Begum	SST(G) GGHS Dado Killi Tangi	ASDEO(F) Circle Tora Panra Charsadda	A.V.P
4	Mst.Kalsoom Syed	SST(G) GGHS Hassan Zai	ASDEO(F) Circle Shabqadar -2 Charsadda	A.V.P

**Note:-**

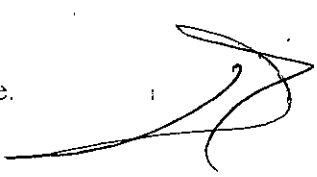

- 1- Charge report should be submitted to all concerned.
- 2- No TA/DA is allowed.

**Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar**

Endst.No. 944-18 /A-17/SST/ADEO/ASDEO/F/Transfer/Charsadda/2018  
Dated Peshawar the 18 /2018

Copy of the above is forwarded to the:-

- 1- District Edu: Officer(F) Charsadda w/r to her No.17345 dated 10-07-2018
- 2- District Accounts Officer, Charsadda
- 3- SDEO(F) Concerned
- 4- ADEO/ASDEO(F) Concerned
- 5- PA to Director (E&SE) Local Office.
- 6- Master file.

*o/c*  
  
Deputy Director Establishment(F)  
(E&SE) Khyber Pakhtunkhwa,  


\*/Noor/18\*

*F/E Directorate Con  
Explanation calle  
by DEO*

28

1669

10/08/2020

To,

The ~~Govt~~ Secretary, (E&SE)  
Govt. of Khyber Pakhtunkhwa  
Peshawar.

SUBJECT: Appeal/ Cancellation of Transfer Order  
R/Sir;

I have the honor to submit as under

- 1: That the applicant is working as ASDEO (Female) Circle Shabqadar since 20/03/2019. (F/A)
- 2: That Directorate of (E&SE) Khyber Pakhtunkhwa Peshawar issued transfer order of the appellant vide notification No. 6335-37/A-17/Transfer/Charsadda Dated Peshawar the 23/06/2020 prematurely and without any justified reasons. (F/B)
- 3: The appellant submit appeal to Worthy Secretary (E&SED) Khyber Pakhtoonkhwa for cancellation of the above mentioned transfer order. (F/C)
- 4: Till that time there was no complaint available against the appellant.
- 5: Further more it was decided by the Service Tribunal Khyber Pakhtoonkhwa in his Judgments Appeal No.356/2017 that  
"This issue has already been thrashed out and settled in various judgments relied upon by the learned counseil for the appellant that transfer of a civil servant could not be made on the basis of complaint because transfer has not been mentioned as punishment in the penalty list in the rules and regulations regarding the conduct of civil servants". (F/D)
- 6: That Secretary (E&SED) Khyber Pakhtoonkhwa accept my appeal and asked Directorate of (E&SE) Education Khyber Pakhtoonkhwa vide No. SO (PE) E&SED/2-1/General Transfer/Posting/2020 Dated Peshawar the 21-07-2020 for withdrawal of transfer order of the appellant.(F/E)
- 7: In this connection the Directorate of (E&SE)Khyber Pakhtoonkhwa withdrawn the transfer order of the appellant vide notification Endst: No. 29198-103/A-17/Transfer/Charsadda Dated 22-07-2020.(F/F)
- 8: Surprisingly the appellant is once again transferred from the post of ASDEO (F) Circle Shabqadar 01 to Circle Charsadda Khas by the Directorate of (E&SE) vide notification Endst: No. 3472-74 Dated Peshawar the 28-07-2020 only after six (06) days.(F/G)
- 9: The whole scene is creating for adjustment of a SST Gul Nasreen (Teaching Cadre) GGMS Dalazak which is against the rules.
- 10: That the post of ASDEO at Shabqadar is still vacant and there is no **Management Cadre** ASDEO available. Further this is also against the decision of the Honorable Peshawar High Court (in WP No.2937).

"Teachers belonging to teaching cadre shall be posted in the Education institution to teach the students according to their qualification while those belonging to administrative cadre shall only hold the posts relating to administration.(F/H)

11: That the matter was also decided by the Honorable Chief Justice Peshawar High Court Peshawar in another WP No. 3737-P/2019.

"In compliance thereof, the respondent have framed service rules for Management Cadre and notified the same for promotion upto BPS-20 vide Notification dated 27.03.2019, hence, keeping in view the aforesaid Service Rules, the action of respondents for adjusting respondents No. 3 to 7 against the petitioners post is in accordance with the law and no writ can be issued in favour of petitioners.

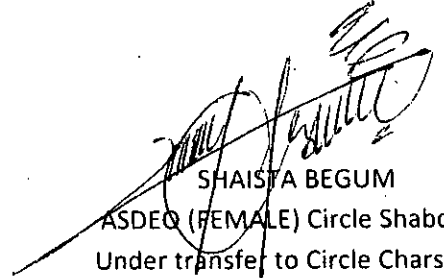
Resultantly, the writ petition being without any merit is hereby dismissed" (F/I)

12: Another Judgment of Service Tribunal Khyber Pakhtoonkhwa Peshawar also goes in favour of the appellant. Appeal No. 345/2019 the Judgment of which was announced on 10-03-2020

" In the light of the above impugned posting transfer order dated 10.09.2018 is set aside and the respondent department is directed to fill up the vacant ADEO post to the Education Office Sub Division Darazinda by appointing a suitable officer belonging to administrative cadre. (F/J)

In view of the above facts/ grounds/ Court decisions, it is once again requested that please accept my appeal and cancel the transfer order of the appellant.

Dated: 29/07/2020

  
SHAISTA BEGUM  
ASDEO (FEMALE) Circle Shabqadar 01  
Under transfer to Circle Charsadda khas

30

40

SS / Syed

Pl. write nice to her & give her a hearing with presence of all concerned staff from District. etc. etc. put in the file.

①

The Secretary,  
Elementary and Secondary Education  
Govt. of Khyber Pakhtunkhwa Peshawar.

SUBJECT: Appeal  
R/Sir;

I have the honor to submit as under

- 1: That the applicant is working as ASDEO (Female) Circle Shabqadar since 20/03/2019. (F.No.25/A-17/SST/ADEO/ASDEO Posting/ Transfer/2019 Dated 14/03/2019)
  - 2: That the District Education Officer (female) Charsadda vide her office letter No. 4713 dated 04/03/2020 proposed transfer of the applicant without any justified reason. In the same proposal all the ASDEOs are willing to change their circles except the applicant. (Written of the ASDEOs attached)
  - 3: That the applicant submits appeal at Directorate of (E&SE) Khyber Pakhtunkhwa Peshawar on 10/03/2020 against the transfer proposal. (Copy attached)
  - 4: That Directorate of (E&SE) Khyber Pakhtunkhwa Peshawar issued transfer order vide notification No. 6335-37/A-17/Transfer/Charsadda Dated Peshawar the 23/06/2020 on that proposal quite after 04 months.
  - 5: That the transfer of the applicant is pre-mature and the applicant performed duty for only about 01 year, which is not a normal "tenure".
  - 6: That the Husband of the applicant is also serving at Shabqadar and as per "Spouse Policy" the applicant has the right to continue my service at Shabqadar.
  - 7: That the post of ASDEO at Shabqadar is still vacant and there is no Management Cadre ASDEO available. Further this is also against the decision of the Honorable Peshawar High Court that to replace or vacate a Management Cadre post for teaching Cadre.
  - 8: That the Husband of the Applicant is gone through heart surgery at AFIC/NIHD Rawalpindi and due to this transfer his health condition will be affect badly. (Record attached).
- In view of the above facts/ grounds it is requested that the transfer order of the applicant may kindly be cancel please.

Thanking you in anticipation

*(Signature)*  
Shaista Begum  
ASDEO (F) under transfer Circle Charsadda

DOLPE  
pls put in the file  
20-7-2020

629

15/7/2020



Amir C

31

To,

The Director Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

SUBJECT: APPEAL

R/Sir

I am the honor to submit as under;

That the appellatant served as ASDEO (F) Circle Shabqadar 01 with great zeal and devotion.

The appellatant was come to know that SDEO (F) Shabqadar stopped the salary of the appellatant without any reason since june 2020.

The appellatant asked the reason of stoppage of pay from SDEO (F) Shabqadar but she didn't reply in this regard.

The appellatant submit an appeal/ complaint to DEO (F) Charsadda Dairy No 2971 dated 06/08/2020 to please direct the SDEO (F) Shabqadar to release the salary of the appellatant.

In meanwhile the appellatant was transferred to Circle Charsadda khas. There the SDEO (F) Charsadda is not ready to release the salary of the appellatant.

Further it is also important that the husband os the appellatant is a heart patient and under treatment of Major General Dr. Afsheen Iqbal (AFIC/NIHD) Rawalpindi.

If any kind of misshapen occurred regarding his health due to lake/ improper treatment, both SDEOs (Miss Kalsoom syed and Miss Shehla). will be held responsible for the consequences.

It is therefore requested to please direct the concerned SDEO (F) to release the salary of the appellatant for the sake of the better education of my children and proper treatment of my husband and also avoid the appellatant from unnecessary litigation please.

Note: If the appellatant compelled to file a suit/case at Honorable Peshawar High Court or Service Tribunal Khyber Pakhtunkhwa Peshawar, all the expenses will be bear by the department.

ADDE(F)

456

28/8/20

Shaista Begum

ASDEO (F) Charsadda Khas



32

GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT

Approved D

NO. SO (E-I)/E&AD/0-08/2010  
Dated Peshawar, the February 8, 2010

To

- 1) The Secretary to Government of Khyber Pakhtunkhwa, Higher Education Department.
- 2) The Secretary to Government of Khyber Pakhtunkhwa, E&SE Department.
- 3) The Secretary to Government of Khyber Pakhtunkhwa, Industries Department.

**SUBJECT: - REQUISITIONING OF SERVICES.**

Dear Sir,

I am directed to refer to the subject cited above and to say that the competent authority has observed that certain Teaching cadre officers are posted out of their cadre since long. Moreover, some teachers/professors are seeking requisitions from different Departments for posting against managerial or administrative posts, hindering deliverance of quality based education to the students. Consequently, competent authority has desired to invite your attention towards the following judgment of Peshawar High Court Peshawar (in WP No. 2937/2009) (Copy enclosed):-

"As the Provincial Government has taken a firm decision that all those teachers belonging to teaching cadre shall be posted in the Education Institution to teach the students according to their qualifications while those belonging to administrative cadre shall only hold the posts relating to administration. Therefore, the petitioners must deliver according to the policy of the Government and because they are highly qualified teachers, it is not befitting to hold administrative posts, because they are getting benefits, but the students are suffering thus, they shall go their respective places, where they are required to do the job.

2. In view of the above, the competent authority has desired that the above mentioned judgment of the PHC be implemented, in letter and spirit, under intimation to this Department, for perusal of Competent Authority.

Yours faithfully,

(ISHTIAQ AHMAD)  
SECTION OFFICER (Estt. I)

9c



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT  
No. SO(PE)E&SED/2-1/General Transfer/Posting/2020  
Dated Peshawar the 21.07.2020

To,

The Director,  
Elementary & Secondary Education,  
Khyber Pakhtunkhwa Peshawar.

Subject: - WITHDRAWAL OF TRANSFER ORDER IN RESPECT OF SHAISTA BEGUM, ASDEO (FEMALE) SHABQADAR, DISTRICT CHARSADDA

Dear Sir,

I am directed to refer to the departmental appeal bearing No. 629 dated 15.07.2020 alongwith connected documents in respect of Mst. Shaista Begum, ASDEO (Female) under transfer to Charsadda Khas Circle and to state that the appellant has been transferred to Charsadda Circle pre-maturely without any justification/reasons and her ASDEO post is still lying vacant at Shabqadar. Furthermore, the long distance will suffer her badly being a female. The competent authority has accepted her appeal.

Therefore, I am further directed to ask you to withdraw transfer order in respect of Shaista Begum and allow her to continue her services at previous station as ASDEO (Female) Circle Shabqadar-I, Charsadda under intimation to this department, please.

Yours faithfully,

SECTION OFFICER (PRIMARY)

Encl: as above:

Enclst: No & date even

Copy forwarded to:-

1. The DEO (Female), District Charsadda, for similar necessary action.
2. PS to Secretary, Elementary & Secondary Education Department, Peshawar.
3. Mst. Shaista Begum, ASDEO (Female) Circle Shabqadar-I, Charsadda

ADDITIONAL  
22/7

SECTION OFFICER (PRIMARY)



34

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA PESHAWAR

NOTIFICATION

Consequent upon approval by the Competent Authority, Mst. Saniya Begum ASDEO (F) Circle Shahqadar Fort 1 Charsadda, is hereby transferred/adjusted as ASDEO (F) Circle Charsadda Khas District Charsadda, in the interest of public service with immediate effect.

Note:-

- i. Charge report should be submitted to all concerned.
- ii. No TA/DA is allowed.

DIRECTOR  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar

Endst: No. 3472-74 /A-17/Transfer/Charsadda. Dated Peshawar the 28 / 7 /2020.

Copy of the above is forward to the:-

1. District Education Officer (Female) Charsadda.
2. District Account Officer Charsadda
3. PA to Director (E&SE) Khyber Pakhtunkhwa.
4. M/ File.

*H. M. M.*  
Deputy Director Establishment (F)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar.

*H*  
28/7/2020

2/3/2020

2/3/2020

2/3/2020

# CERTIFICATE OF TRANSFER OF CHARGE

35

1. Certified that we have on the fore/after noon on 26/06/2020 (F.N) of this day respectively made over and received Charge of the office of SDEO (F) Charsadda Notification Issued By Director E&SE KPK Peshawar Under Endst No.3472-74 / A-17/Transfer/Charsadda dated Peshawar 28/07/2020

2. Particulars of cash and important secret and confidential documents handed over are noted on the reverse:-

Signature of relived Govt: Servant: Vacant Post

Government Servant. \_\_\_\_\_

Designation: ASDEO(F)

Station Circle Charsadda Khass :

Signature of reliving

Government Servant. Shaista Begum

Designation: ASDEO

*[Handwritten Signature]*  
14/09/2020

Took Over Charge on the Post of ASDEO on 19-09-2020 (F.N)

Endst : No. 550-56 / Dated Charsadda the 19 / 09 / 2020

Copy for information & n/action to the:-

1. Directorate of (E&SE) Khyber Pakhtunkhwa Peshawar.
2. District Education Officer (Female) Charsadda.
3. District Account Office Charsadda
4. SDEO (Female) Charsadda./ Shabqadar
5. ASDEO (Circle) Concerned.
6. Cashier Local Office.
7. Office File.

*[Handwritten Signature]*  
SUB-DIVISIONAL EDUCATION OFFICER  
(FEMALE) CHARSADDA  
19/09/2020

DIRECTORATE OF ELEMENTARY & SECONDARY  
EDUCATION KHYBER PAKHTUNKHWA PESHAWAR

NOTIFICATION

Consequent upon approval by the Competent Authority, a Transfer/adjustment order issued vide this office notification Endst No. 600/A-17/Transfer/Charsadda dated: 23-06-2020, in respect of Mst. Sharada Begum ASD/11 (E) Circle Charsadda at S. No.04, is hereby withdrawn with immediate effect.

Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

Endst. No. 29198-103 /A-17/Transfer/Charsadda.

Dated 22/07/2020

Copy of the above is forwarded to the:-

1. Section Officer (Primary) E&SED w/r to his letter No.SO (PF) E&SED/21/General Transfer/Posting/2020 dated: 21-07-2020.
2. District Education Officer (Female) Charsadda.
3. District Education Officer (Female) Charsadda.
4. Official concerned.
5. PA to Director (E&SE) Local Office
6. Master file.

Deputy Director Establishment of  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

*[Signature]*  
22/7/2020

**DIRECTORATE OF ELEMENTARY & SECONDARY  
EDUCATION KHYBER PAKHTUNKHWA PESHAWAR**

**Notification**

Consequent upon approval by the competent authority is transfer/adjustment order issued vide this office Notification Endst. No. A-17/Transfer/Charsadda dated 23.06.2020 in respect of Mst. Shaista Begum ASDEO (F) Circle Charsadda at S.No.04 is hereby withdrawn with immediate effect.

**Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar**

**Endst No.29198-103/A-17/Transfer/Charsadda**

**Dated 22.07.2020**

**Copy of the above is forwarded to the:**

- 1. Section Officer (Primary) E&SED w/r to his letter No.SO(PF)E&SED2-1/General Transfer/Posting/2020 dated 21.07.2020.**
- 2. District Education Officer (Female) Charsadda**
- 3. District Education Officer (Female) Charsadda**
- 4. Official concerned.**
- 5. PA to Director (E&SE) Local Office.**
- 6. Master File.**

**Sd/-xxxx  
Deputy Director Establishment  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar**

(FEMALE) CHARASADDA

Contact No: 091-9220456 Email Address: emias.charasadda.dept@pak.gov.com

/Dated/ 26 / 07 / 2020.

37

1. The Principals / Head Mistresses Concerned.
2. The SDEO (Female) Tangi.
3. The SDEO (Female), Shabqacar Fort.

SUBJECT:- RELIEVING OF SHUFLING MINISTERIAL STAFF  
Memo,

The competent authority is pleased to reshuffled, the following Ministerial Staff order issued vide this office Endstt No. 7741-48 dated 27/07/2020 & letter No. 7738, at S.No. 04 & 05, dated 27/07/2020

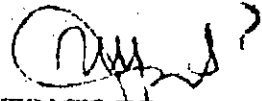
You are directed to relieve the Ministerial staff of your office/ School immediately and under intimation to this office.

DISTRICT EDUCATION OFFICER  
(FEMALE) CHARASADDA

Endstt No. 8406-08

Copy for Information to the:

1. PA to Director E&SE Khyber Pakhtukhwa Peshawar.
2. PA to Deputy Commissioner Charasadda.
3. Office File.

  
DISTRICT EDUCATION OFFICER  
(FEMALE) CHARASADDA



OFFICE OF THE  
DISTRICT EDUCATION OFFICER  
(FEMALE) CHARSADDA

NO 7738 /Dated 27/7 2020

38 ✓

The Director  
E&SE Khyber Pakhtunkhwa  
Peshawar

Subject:- SHUFFLING OF ALL MINISTERIAL STAFF FROM DEOS AND SDEOS  
OFFICES TO SCHOOLS

Memo:-

I am to refer to your good office letter No 903-958 /F.No A/23 /MS/Reshuffling  
Dated 03/07/2020 on the subject above and to enclose here with the requisite information  
regarding Assistance Superintendents and B&AOs of this District are here by submitted for  
further process please.

S/#	Name	Designation	Present Station	Tenure	Remarks
01	Adalat Khan	B&AO BPS-17	DEO (F) Charsadda	01/08/2013	06 year 10 months & 29 days
02	Niha Muhammad	Assistant BPS-16	--do--	01/01/2016	04 year 05 months 29 days
03	Zafar Ullah	Assistant BPS-16	--do--	15/09/2016	03 year 07 months 25 days
04	Zahoor Jan	S/C BPS-14 (Working against of (KPO)	SDEO (F) Shabqadar	2017	2 years 6 months
05	Abdul Nasir	S/Clerk (Working against of (AP)	DEO (F) Charsadda	2018	2 years

  
DISTRICT EDUCATION OFFICER  
(FEMALE) CHARSADDA



39 36

**DIRECTORATE OF ELEMENARY & SECONDARY EDUCATION**  
**KHYBER PAKHTUNKHWA PESHAWAR**

**NOTIFICATION**

Consequent upon approval by the Competent Authority, Mst. Shaista Begum ASDEO (F) Circle Charsada Khas, is hereby transferred/adjusted as ASDEO (F) Circle Shabqadar District Charsadda, in the interest of public service with immediate effect.

Note:-

- i. The services of Mst. Gul Nasrin working as ASDEO (F) Circle Shabqadar is placed at the disposal of DEO (F) Charsadda for further adjustment.
- ii. Charge report should be submitted to all concerned.
- iii. No TA/DA is allowed.

**DIRECTOR**  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar

Endst: No. 684648 /A-17/Transfer/Charsadda.

/2020

Dated Peshawar the 10/11/2020

Copy of the above is forward to the:-

1. District Education Officer (Female) Charsadda.
2. District Account Officer Charsadda
3. PA to Director (E&SE) Khyber Pakhtunkhwa.
4. M/ File.

*Hms*  
**Deputy Director Establishment (F)**  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar

*10/11/2020*

Date \_\_\_\_\_

Day **M T W T F S**

# Arrival / Compliance Report.

Consequent upon Notification of Directorate of Elementary & Secondary Education Khyber Pakhtoon Khwa  
 Peshawar Endsl: No. 6846-48/A-17/  
 Transfer/Charsadda Dated Peshawar  
 the 10/11/2020, I Shauza Begum  
 took the charge of ASDEO (F) Circle  
 Shabqadar today on 11/11/2020.  
 The arrival / Compliance report  
 is therefore submitted to SDEO  
 (F) Shabqadar for further necessary  
 action / onwards submission please.

Note:- Transfer order copy  
 is attached.

Received on 11/11/2020

*[Signature]*  
 S.D.E.O (F) 11-2020  
 Shabqadar

Handed over charge of  
 ASDEO (F) Circle of  
 Shabqadar

*[Signature]*  
 11/11/20  
 D.E.O (F)  
 Charsadda

*[Signature]*  
 11/11/2020  
 S.D.E.O (F)  
 Shabqadar

(Female) Circle Shabganai of

No 509 Date 05/12/2020

41

To

The SDEO (F)  
Shabganai

Recd

*[Signature]*  
05/12/2020

Subject  $\Rightarrow$  proposal / stop gap arrangement

Memo

I am to refer to the above cited subject the following proposal is hereby submitted for your kind perusal as asked please.

S.No	Teacher Name	From	To	Remarks
01	Shama Zahar PST	GAPS Kodai	GAPS Halimzu	As original Appointee
02	Gulalai PST	GAPS Shahid Gul Korona	GAPS Daryab Korona	As original Appointee
03	Malika Wazim (PST)	GAPS Mansaka	GAPS Shahid Gul Korona	Need base
04	Alya Jam (PST)	GAPS Shabganai	GAPS Kodai	Need base

It is further mentioned that Misses at S.No 03 is NIS appointee (2019) submitted for onwards submission please

*[Signature]*  
Official

42

SUB-DIVISION EDUCATION OFFICER  
FEMALE SHABQADAR

No. 1528 /Dated. 5/12/2020

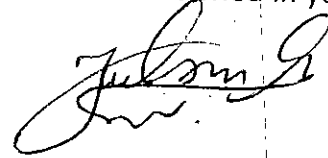
To,

The ASDEO (F)  
Circle Shabqadar

**SUBJECT:** Arrangement of Chowkidar

Memo:

It is to refer your office letter No. 502 dated 23-11-2020 on the above mentioned subject and to state to submit your proposal for posting of Chowkidar to the needy schools till the appointment of Chowkidars in the schools mentioned in your letter mentioned above.



SUB-DIVISION EDUCATION OFFICER  
FEMALE CHARSADEA



43



**DIRECTORATE OF ELEMENARY & SECONDARY EDUCATION KHYBER  
PAKHTUNKHWA PESHAWAR**

**NOTIFICATION**

Consequent upon approval by the Competent Authority, the following SST teachers are hereby transferred/adjusted on their own pay and BPS in the best interest of public service with immediate effect.

S.No	Name of SST	Name of Station	Transfer to	Remarks
01	Gul-e-Nasreen (T/C)	SST (G) GGMS Dalazak (SKF)	ASDEO (F) Circle Shabqadar 1 Charsadda	A.V.P
02	Mehad Begum (TC)	SST (G) GGMS ziarat Killi Tangi	ASDEO (F) Circle Tangi Charsadda	A.V.P

**Note:-**

- 1 Charge report should be submitted to all concerned.
- 2 No TA/DA is allowed.
- 3 Their seniority will intact in their own cadre.

**DIRECTOR**  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar

Endst No. B6-22 /F.No. 05/A-17/ADEO/Transfer

Dated Peshawar the 14/08/2020

Copy of the above is forwarded to the:-

- 1) District Education Officer (F) Charsadda w/r to her letter No. 7774 dated: 29-07-2020.
- 2) District Accounts Officer Charsadda.
- 3) PA to Director (E&SE) Local Office.
- 4) Master file.

*Hani*  
Deputy Director Establishment (F)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar

*14/8/20*



**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA PESHAWAR.**

No. \_\_\_\_\_ /F.No. /A-23/MS/Inquiry/Musawri J/Clerk

Dated Peshawar the 13/10 /2020

Phone: 091-9225344

Email: ddadmn.ese@gmail.com

To

The SDEO  
(Female) Shabqadar Charsadda

Subject: **EXPLANATION**

Memo:

I am directed to refer to your letter No.1479 dated 26/09/2020 on the subject cited above and to ask you to relieve Mr. Musawar Iqbal Junior Clerk immediately under intimation to this office.

I am further directed to ask you to explain your position as to why strict disciplinary action should not be initiated against you under E&D Rules-2011 in connection with making direct corresponding with the Directorate E&SE KPK Peshawar.

Your reply should reach this Directorate within 03 days positively, otherwise in case of failure, you will be personally held responsible for the consequences.

**Deputy Director (F&A)**

Directorate E& Secondary Education  
Khyber Pakhtunkhwa, Peshawar

Endst; No. 633

Copy forwarded to the: -

1. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.

**Deputy Director (F&A)**

Directorate E& Secondary Education  
Khyber Pakhtunkhwa, Peshawar

**POWER OF ATTORNEY**

In the Court of Khyber Pakhtun Khwa Special Tribunal Peshawar  
Shahista Begum

} For  
} Plaintiff  
} Appellant  
} Petitioner  
} Complainant

**VERSUS**

Govt of KPK and others

} Defendant  
} Respondent  
} Accused  
}

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

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

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

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

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

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

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

**IMRAN KHAN**  
Advocate High Court  
Mob: 0345-9090648

**ZARTAJ ANWAR**  
Advocate High Courts  
ADVOCATES, LEGAL ADVISORS, SERVICE & LABOUR LAW CONSULTANT  
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