


FORM OF ORDER SHEET

Court of _____

Appeal No. 1443/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	07/07/2023	<p>The appeal of Mst. Bibi Amina presented today by Mr. Farman Ullah Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR
CHECK LIST

Mst Amina Bibi

Versus

Govt

..... Appellant

..... Respondents

S NO	CONTENTS	YES	NO
1.	This petition has been presented by: <u>Advocate</u> <u>Court</u>	✓	
2.	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	✓	
3.	Whether appeal is within time?	✓	
4.	Whether the enactment under which the appeal is filed mentioned?	✓	
5.	Whether the enactment under which the appeal is filed is correct?	✓	
6.	Whether affidavit is appended?	✓	
7.	Whether affidavit is duly attested by competent Oath Commissioner?	✓	
8.	Whether appeal/annexures are properly paged?	✓	
9.	Whether certificate regarding filing any earlier appeal on the subject, furnished?	✓	
10.	Whether annexures are legible?	✓	
11.	Whether annexures are attested?	✓	
12.	Whether copies of annexures are readable/clear?	✓	
13.	Whether copy of appeal is delivered to AG/DAG?	✓	
14.	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	✓	
15.	Whether numbers of referred cases given are correct?	✓	
16.	Whether appeal contains cutting/overwriting?	✓	
17.	Whether list of books has been provided at the end of the appeal?	x	
18.	Whether case relate to this court?	✓	
19.	Whether requisite number of spare copies attached?	✓	
20.	Whether complete spare copy is filed in separate file cover?	✓	
21.	Whether addresses of parties given are complete?	✓	
22.	Whether index filed?	✓	
23.	Whether index is correct?	✓	
24.	Whether Security and Process Fee deposited? On _____	✓	
25.	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On _____	✓	
26.	Whether copies of comments/reply/rejoinder submitted? On _____		
27.	Whether copies of comments/reply/rejoinder provided to opposite party? On _____		

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name:- Ferman ulah khattak

Signature:- [Signature]

Dated:- _____

BEFORE THE SERVICE TRIBUNAL KHYBER PUKHTOON

KHAWA PROVINCE, PESHAWAR.

Service Appeal No. 1443 of 2023.

Mst. Bibi Amina.....Vs.....Government of NWFP etc.

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4.	Copy of the request/application in shape of appeal, dated, 16 th March, 2023.	B	9
5.	Copy of the posting/transfer order as a Principal GGHSS Mathra, Peshawar, dated, May 15 th , 2023.	C	10
6.	Copy of the Arrival report, Relieving order & Charge assumption report.	D,E & F	11-13
7.	Copy of Salary Slip and pay fixation.	G & G/1	14-15
8.	Copy of Service Certificates of Husband, Scholl Certificate of Children's.	H, H/1 & H/2.	16- 20
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Appellant,

Through

(Farmanullah Khattak),
Advocate, Peshawar.

Dated: 06 July, 2023

BEFORE THE SERVICE TRIBUNAL KHYBERPUKHTOON**PESHAWAR.**

Service Appeal No. 1443 of 2023.

Mst. Bibi Amina Principal Govt. Girls Higher Secondary School
Mathra, Peshawar, Resident of House No. 56, Street No.3, Sector.
N/1, Phase-4, Hayat Abad, Peshawar. (Appellant).

Versus

1. Government of Khyber Pakhtunkhwa, through Chief Secretary Civil Secretariat, Peshawar.
2. Government of Khyber Pakhtunkhwa, through Elementary & Secondary Education Department, Civil Secretariat, Peshawar.
3. Director of Education, Directorate of Elementary & Secondary Education Department, Main G.T Road, Peshawar.
.....Respondents.

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974, AGAINST WITHDRAWAL OF POSTING ORDER, DATED, 15TH MAY, 2023, THROUGH IMPUGN ORDER ISSUED ON 16TH MAY, 2023 AB-INITIO AND AGAINST WHICH DEPARTMENTAL APPEAL/REPRESENTATION HAS ALSO BEEN DISMISSED BY THE SECRETARY ELEMENTARY & SECONDARY EDUCATION DEPARTMENT, VIDE, NOTIFICATION, NO. SO(S/F) E& SED/4-16/2023, DATED, JULY 5TH, 2023.

PRAYER IN APPEAL

THAT ON ACCEPTANCE OF THIS APPEAL, THIS HON'BLE TRIBUNAL MAY GRACIOUSLY BE PLEASED TO SET ASIDE AND CANCELLED THE IMPUGN TRANSFER WITHDRAWAL OF OFFICE ORDER, 16TH MAY, 2023 ISSUED ON VACANT POST OF PRINCIPAL GGHSS MATHRA, PASSED BY THE SECRETARY ELEMENTARY & SECONDARY BASED ON MALFIDE, POLITICAL CONSIDERATION AND LIABLE TO BE SET-ASIDE BY THIS HON'BLE TRIBUNAL.

Respectfully Sheweth:

1. That applicant joined the service as a Subject Specialist in the year 2003 on the recommendation of Provincial Public Service Commission and was lastly promoted/posted as a Principal (BS-19)

GGHSS Teri Karak, vide, order, dated, 15th March, 2023 against vacant post. (Copy of notification is hereby encsleod as **Annex-A**).

2. That thereafter Appellant made request to Respondent No.2 on the grounds that her children are getting education in University, School & College in Peshawar. Besides her husband is also serving in Beaconhouse School System, Peshawar and on the basis of humanitarian ground as well as on spouse policy she may be posted on any vacant post in periphery of Peshawar. (Copy of the Application/request, dated, 16th March, 2023 is herby encsleod as **Annex-B**).
3. That thereafter request of petitioner was acceded by the competent authority and appellant was posted, vide, partial modification through corrigendum order issued, vide, order dated, May, 15th, 2023, in which Appellant was directed to assume charge as a Principal at GGHSS Mathra, Peshawar on 31-05-2023, instead of GGHSS Teri Karak. (Copy of the Order, dated, May 15th, 2023 is hereby encsleod **Annex-C**).
4. That consequent upon promotion & posting order, dated, May 15th, 2023, Appellant made arrival report on 16th May and even order of relieving was issued on 30-05-2023 and then transfer order was actualized on 01-06-2023 on eve of retirement of the then Principal Mst. Riffat Naseem and appellant took over the charge as a Principal GGHSS Mathra, Peshawar. (Copy of the Arrival report, Relieving order & Charge assumption as a Principal is herby encsleod **D, E & F**).
5. That the appellant was satisfactorily discharging their duties and even salary has been released as a Principal GGHSS Mathra after punching of Salary & Pay fixation made by the District Account Office, Peshawar. (Copy of Salary Slip and pay fixation is herby encsleod **Annex-G & G/1** respectively).
6. That since applicant is permanently settled in Hayat Abad, Peshawar and even her husband is Senior Teacher (Math's) now-a-days in Beacon house School Jamrud, Campus having growing children and one of her daughter is studying in BS Political Science Islamia, University and the other children are Studying in Colleges and Schools in Peshawar which needs proper attention & care as a parents. (Copy of which is hereby encsleod as **Annex-H, H/1 & H/2**).
7. That due to utter shock and quiet astonishingly, after lapse of one & half months applicant came to know on 21st June, 2023, that posting/transfer order, dated, 15th May, 2023 has been withdrawn ab-initio retrospectively, vide, order, dated, May, 16th, 2023, purely on political motivation and totally against the posting & transfer policy

notified by the Provincial Government. (Copy of the impugn order, dated, 16th May, 2023 is hereby encsleod as **Annex-I**).

8. That for the reason best known to the authority but apparently by managing political influence, the promotion and subsequent posting order purely on vacant post as a Principal GGHSS Mathra has been re-called/cancelled, in which applicant was recently promoted/transferred and took charge over the vacant post, therefore, appellat made representation/appeal before the worthy Secretary Respondent No-2, however, appeal of Appellant, was dismissed, vide, impugn rejection order, dated, July 05th, 2023. (Copy of Appeal/Representation & Rejection is hereby encsleod as **Annex-J & k** respectively).
1. That since the departmental appeal/representation has been dismissed/rejected, therefore, appellat approach to this Hon'ble Tribunal through the instant appeal, on the following grounds, inter alias:-

GROUND:

- A. That the impugned transfer/posting orders are against law and violation of standing instructions/ transfer policy issued by the Government of Khyber Pakhtunkhwa.
- B. That the impugned transfer order dated 16th May, 2023 and subsequent rejection of Departmental Appeal, dated, 5th July, 2023 issued by the Secretary Elementary & Secondary Education Department in respect of appellat, is in flagrant violation of spouse policy, pre-mature especially when appellat has been posted on vacant post of principal and even assume charge, draw salary as a Principal and all of sudden his posting order was withdrawn ab-initio without any reasons and even completing his normal tenure in the present place of posting.
- C. That appellat is permanently settled in Peshawar and mother of 04 children whose education, schooling, food and clothing is the prime responsibility of the mother in our society and therefore the impugn transfer order cause great inconvenience to the school going children studying here in Peshawar. The appellat present posting at Peshawar on vacant was purely made on the basis of humanitarian ground as well on spouse policy of the Government that husband and wife if they are government servants, may be posted at one station.
- D. That the impugned posting/transfer was totally based on malafide, political consideration and against the spouse policy is liable to be set aside/struck down by this Hon'ble Tribunal.


E. That the appellant will urge additional grounds at the time of hearing of the appeal with the permission of this Hon'ble Court.

It is, therefore, most humbly prayed that in the light of above submissions, this Hon'ble Tribunal may kindly be pleased to set aside and cancelled the impugn transfer of withdrawal order, 16th may, 2023 issued on vacant post of Principal GGHSS Mathra on 15th May, 2023 passed by the Secretary Elementary & Secondary based on malfide, political consideration and liable to be set-aside by this Hon'ble Tribunal and in violation of transfer policy issued by the Government of NWFP from time to time.

Any other relief/remedy may deem appropriate in the circumstances of the case by not specifically asked for may also graciously be granted in the instant appeal.

Appellant, 

Through


(Farmanullah Khattak),
Advocate, Supreme Court of
Pakistan.

Certificate:

It is certified that no other service appeal on the same subject has been filed against the impugn transfer order, except this one.


Advocate.

BEFORE THE SERVICE TRIBUNAL KHYBER PUKHTOON**KHAWA PROVINCE, PESHAWAR.**

Service Appeal No. _____ of 2023.

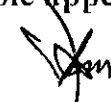
Mst. Bibi Amina.....Vs.....Government of NWFP etc.**APPLICATION FOR INTERIM RELIEF.**Respectfully Sheweth:

1. That the above noted appeal has been filed before this Hon'ble Tribunal wherein no date of hearing has yet been fixed.
2. That the facts and reasons stated in the accompanying appeal may kindly be read as a part and parcel of this application. This Hon'ble Tribunal has the power to set aside the impugned transfer of withdrawal order passed by the Secretary Elementary & Secondary Education Department, Peshawar on vacant post being pre-mature based against spouse policy and instructions issued by the Government of Khyber Pakhtunkhwa.
3. That there exist a good prima facie case and the balance of convenience also tilts in favour of the appellant.
4. That the impugned transfer order is based on malafide, premature and against spouse policy when appellant has been posted on vacant post, assume the charge of Principal GHSS Mathra and even draw salary but the impugned transfer has been issued retrospectively without knowledge of appellant in clandestine manner and being liable to be cancelled/suspended by this Hon'ble Tribunal for the time being. In case the impugned transfer order is not set aside the school going children of the appellant will suffer irreparably.

It is, therefore, humbly prayed that on acceptance of this application, the withdrawal of posting/transfer order dated 16th May, 2023 may kindly be stayed/suspended in the interest of justice till pending decision of the case.


Your humble appellant,

Through


(Farmanullah Khattak),
Advocate, Peshawar.

BEFORE THE SERVICE TRIBUNAL KHYBER PUKHTOON
KHAWA PROVINCE, PESHAWAR.

Service Appeal No. _____ of 2023.

Mst. Bibi Amina.....Vs.....Government of NWFP etc.

APPLICATION FOR INTERIM RELIEF.

AFFIDAVIT.

I, Mst. Bibi Amina Principal Govt. Girls Higher Secondary School Mathra, Peshawar, Resident of House No. 56, Street No.3, Sector. N/1, Phase-4, Hayat Abad, Peshawar, do hereby solemnly declare on oath that the contents of the above Service Appeal as given by me are true and correct to the best of my knowledge and that nothing has been concealed or kept secret from this Hon'ble Tribunal.

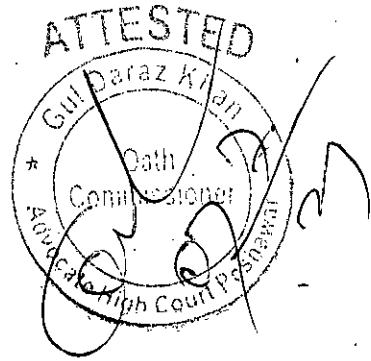
B. Amina

Deponent.

ENIC 14203-1987486-8

Identified by;

Farmanullah Khattak
(Farmanullah Khattak),
Advocate, Peshawar.





(7) (A)
GOVT. OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Email: sectionofficers@gmail.com

001-0223500

Dated Peshawar the March 15th, 2023

NOTIFICATION

NO. SO(S/F)E&SED/2-J/2022/Promotion/: In pursuance of this Department's notification of even No. dated 13.12.2022 (on their promotion from (BS-10) to (BS-10) and on the relaxation of ban on posting/transfer of officers by the Election Commission of Pakistan vide letter dated 01.02.2023, the following teaching cadre officers of BS-10 are hereby posted accordingly:

Sr. No	Name & Designation	From	To
01	Mst. Bakht Bibi	GGHSS Joghwara Peshawar	GGHSS Ghallanai Mohmand (AVP)
02	Mst. Noor Shad Ali	GGHSS Ghorfwala Bannu	GGHSS Shahbaz Azmat Khel Bannu (AVP)
03	Mst. Riffat Yasmin	GGHSS No.2 Mansehra	GGHSS Oghi Mansehra (AVP)
04	Mst. Farsiya Kanwal	GGHSS Dhamor Abbottabad	GGHSS Balakot Mansehra (AVP)
05	Mst. Jannat Bibi	GGHSS Shahdhand Baba Mardan	GGHSS Palai Malakand (AVP)
06	Mst. Zubaida Khatoon	GGHSS Gulshan Abad Manora Swabi	GGHS KSK Swabi Vice Sr. No. 16
07	Mst. Naila Bibi	GGHSS Bangash Khel Bannu	RPDC (F) Bannu AVP of Senior Instructor
08	Mst. Shabana Begum	GGHS Sakai Mardan	GGHSS Shahdhand Baba Mardan (AVP)
09	Mst. Sabina Yusrat Rahim	GGHSS University Town Peshawar	GGHSS Teta Kan Malakand (AVP)
10	Mst. Ishrat Zakir	RPDC Abbottabad	GGCMS Kotnajibullah Haripur (AVP)
11	Mst. Bibi Arnina	GGHSS Chamkani Peshawar	GGHSS Teri Karak (AVP)
12	Mst. Mastoore Khas	GGHSS Nowshera Kalan	RPDC (F) Swat AVP of Senior Instructor
13	Mst. Uzma Ali	GGHSS No.2 D.I Khan	GGHSS Narshukrullah Bannu (AVP)
14	Mst. Humera Khanum	GGHSS Joghwara Peshawar	GGHS Joligram Malakand (AVP)

A#
/

(8)



GOVT. OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
Email: aectionofficeoraf@gmail.com
091-9223500

5	Mst. Sanam Haroon	GGHSS Akora Khattak Nowshera	GGHSS Mandoori Nowshera (AVP)
Consequential Posting/transfer			
6	Mst. Gul e Rana Principal (BS-19)	GGHS KSK Swabi	RPDC (F) D.K Khan AVP of Senior Instructor (BS-19)

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

ndst: of even No.& date:

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Female) concerned.
4. Principal RPDCs concerned.
5. Director, Directorate of Professional Development (DPD) Peshawar.
6. District Account Officer concerned.
7. Director EMIS, E&SE Department for uploading at official website at the earliest.
8. PS to Minister for E&SE Department, Khyber Pakhtunkhwa.
9. PS to Secretary, E&SE Department.
10. Office order file.


(SHAWANA HALEEM)
SECTION OFFICER (S/F)

9

B

Amra

To

The Worthy Secretary to Govt. of Khyber Pakhtunkhwa,
Elementary & Secondary Department,
Peshawar.

Subject: REQUEST FOR ISSAUNCE OF CORRIGENDUM IN NOTIFICATION
No.SO(SIF)E&SED/2-3/2022/Promotion dated 15-03-2023 to the Effect
of S.No.11

Respected Sir,

With high honour, it is submitted that I was serving as Senior Subject Specialist (BPS-18) in GGHSS, Chamkani and has recently been promoted to the post of BPS-19. I am permanently settled at Peshawar and my kids are getting education in various institutes at Peshawar. Besides, my husband is also Senior Lecturer in Pak-Tuk School & College, Peshawar.

It is submitted that I have been adjusted vide the subject notification at Serial no. 11 at GGHSS, Teri Karak, which is far away from my residence at Peshawar. It will suffer me being a lady as well as my family and kids studying here. It is pertinent to submit that a post of Principal (BPS-19) at GGHS Mian Gujar, District Peshawar is being run by a teacher of Grade-18 in her own Pay & Scale, who is serving on the wrong post.

In view of the above, it is requested that I may very kindly be posted as Principal at GGHS Mian Gujar, District Peshawar on highly humanitarian grounds as a special case, by issuance of a corrigendum in the subject notification.

I hope that you will consider my request sympathetically.

Regards!

Yours Obediently

Bibi Amlina 16/3/23

Bibi Amlina
Principal GGHSS Teri Karak
(Newly posted)

Amra

Dated: 16th March, 2023

3/23

16

C
Amu

GOVT. OF KHYBER PAKHTUNKHWA

DEPARTMENT OF PRIMARY & SECONDARY EDUCATION DEPARTMENT

Email: sectionoffice@goatd.com

091-9221588

Peshawar, the May 15th, 2023

CORRIGENDUM

NO.SO(S/F)E&SE/2-3/2022/Promotion/: In partial modification of this Department's Notification of even No. dated 15.03.2023, the phrase of posting in respect of Mst. Tabia Agha (newly promoted) (BS-19) appearing at S. No. 15 may be read as GGHS Maria Peshawar instead of GGHS Iva Karak. She will assume charge on 31.05.2023 after retirement of Mst. Riffat Naseem Principal (BS-19).

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Endst: of even No.& date:

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Female) Karak.
4. District Account Officer Karak.
5. Director EMIS, E&SE Department for uploading at official website at the earliest.
6. PS to Minister for E&SE Department, Khyber Pakhtunkhwa.
7. PS to Secretary, E&SE Department.
8. Officers/Official Concerned.
9. Office order file.sh

(SHAWANA FAL EEM)
SECTION OFFICER (S/F)

CS CamScanner

CS CamScanner

(12)

(E)

OFFICE OF THE PRINCIPAL,
GOVT. GIRLS HIGHER SECONDARY SCHOOL,
CHAMKANI PESHAWAR.
No. 8873 Dated. 30-05-2023

Amir

To,

Mst. Amir Bibi
SSS, BRS-8,
GGHSS Chamkani Peshawar.

SUBJECT: RELIEVING CHIT.

Memo:

You have been transferred/promoted from Govt. Girls Higher Secondary School Chamkani Peshawar to GGHSS Mithra Peshawar under Endst: NO SO/S/F/E&SED/2-3/2022/Promotion Dated Peshawar the 15/05/2023. You are hereby relieved from your duties on 31-05-2023 (After/Non), you are directed to report to GGHSS Mithra Peshawar.

PRINCIPAL,
GOVT. GIRLS HIGHER SECONDARY SCHOOL,
CHAMKANI PESHAWAR.

Amir

(13)

(F)

CERTIFICATE OF TRANSFER OF CHARGE

- 1 Certified that we have on the fore/ afternoon of this day respectively made over and receive Charge of this office of the Principal Govt: Girls Higher Secondary School Mathra Peshawar. Corrigendum (newly promoted) Principal (BPS 19) Mst: Bibi Amina (principal) BS-19 Vide Order Secretary to Govt of Khyber Pakhtunkhwa E&SE Department Peshawar No.SO(5/F) E&SED/2-3/2022 Promotion. Dated 15-05-2023.
- 2 Particulars of cash and important secret and confidential documents handed over are noted On the reverse:-

Signature of relieved [Signature]

Government servant MST: RIFFAT NASEEM

Station GGHS Mathra Peshawar

Designation PRINCIPAL (BS-19)

Signature of relieving [Signature]

Dated 01-06-2023

Government Servant Mst: BIBI AMINA

Designation PRINCIPAL (BS-19)

OFFICE OF THE PRINCIPAL GOVT: GIRLS HIGHER SECONDARY SCHOOL MATHRA PESHAWAR

Encls: No. _____ Dated Peshawar the: _____/06/2023.

Copy for information to the:-

- 1 Accountant General Khyber Pakhtun Khwa Peshawar.
- 2 Director (E&SE) Khyber Pakhtunkhwa Peshawar.
- 3 District Education Officer (Female) Peshawar.
- 4 Officer Concerned

[Signature]

PRINCIPAL
GOVT: GIRLS HIGHER SECONDARY
SCHOOL MATHRA PESHAWAR

[Signature]

14

4

PERSONNEL STATE

P. 50000. MONTHLY 2021
PRINCIPAL G.G.S.S.S. PAth
PRINCIPAL GGSS NATHIA P

DATE: 05/05/2025
NAME: BIBI SHIRAZ
PRINCIPAL

POST: 4961
G.P. NO: 4961
P. NO: 4961

PRIC No: 12031907400

CP: Int-Post Appl-1

1. Active Temporarily

PAID AND ALLOWANCES:

001 Basic Pay	1,20,000.00
1004 House Rent Allow (7% 7%)	1,200.00
1.10 Convey Allowance	1,200.00
1.14 Medical Allow (15% 15%)	1,800.00
1.16 Adhoc Medical Allow (15%)	1,800.00
1.18 Adhoc Medical Allow (15%)	1,800.00
1.19 Teaching Allowance	11,842.00
1.21 Special Pay (15% 15%)	1,800.00
1.22 Special Pay (15% 15%)	1,800.00
Grand Total (including 1.22)	1,28,442.00

DEDUCTIONS:

1.10 Provident Fund	1,200.00
1.11 Pension	1,200.00
1.12 Bonus	1,200.00
1.13 Special Pay	1,800.00
1.14 Special Pay	1,800.00

Net Pay

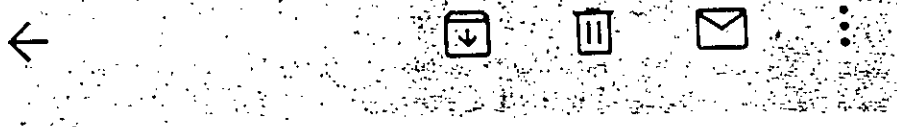
1,27,242.00

11/05/2025
NATIONAL BANK OF PAKISTAN LTD
011114410

Handwritten signature

15

9/11



00302825
BIBI AMINA
PW6133

Office Details	
	BPS UPDATED TO to 19
	DDO CODE CHANGED to PW6133 - PRINCIPAL G.G.H.S.S - MATHRA PESHAWAR
	DESIGNATION CHANGED to 80323120 - PRINCIPAL
	DISTRICT GOVERNMENT KHYBER PAKHTUNKHWA
Pay Details	
	Payscale GROUP CHANGED TO to 19
	Payscale STAGE CHANGED TO to 10
	Pay against wage type 0001 (Basic Pay) is Rs. 128610

Am
Handwritten signature and initials.

16

H



Name: Sadiq ur Rehman
Employee I.D: 34231
Designation: Teacher

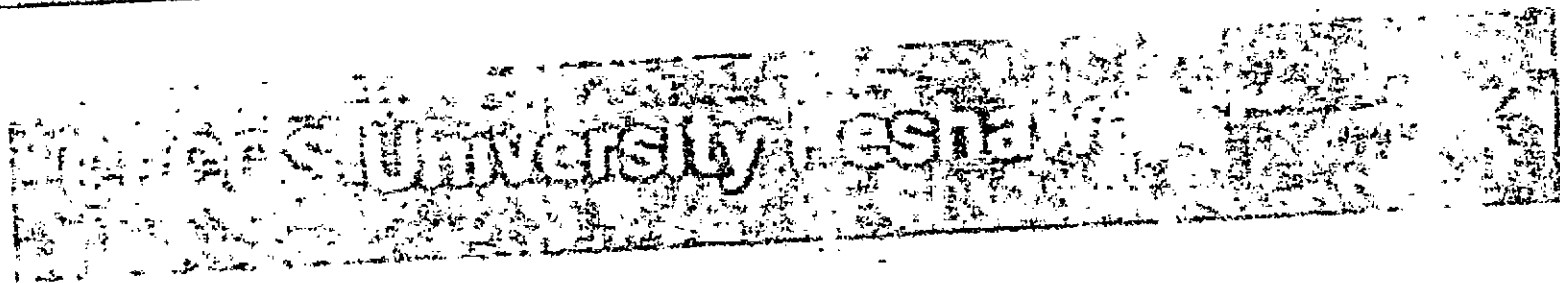
Library Card

Sadiq-ur-Rehman
Branch: 341-Jaurud Campus
Peshawar



E-34231

Out



14/11

14/11

Graduating Students Survey



Student ID: CU-1429-2020

Name: **HAMZA RAHMAN**

Bachelor of Science in Software Engineering

Semester: **6**

Reg # : 2020/CUP/BSSE-0581

Class Code : BSSE-2020A

Enrolment Date : 26-OCT-20

Degree Expires On : 26-OCT-2027

17

H/2



Muljammia College Jessalwar

10/07/2026

18

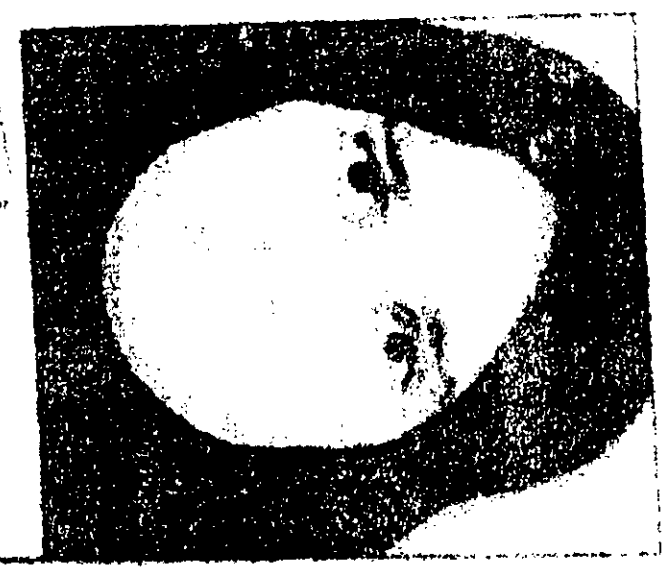
Name: **Manahil Rehman**

F/Name: **Sadiq Ur Rehman**

Department: **Political Science -A**

Class No: **220633**

Expiry: **June, 2026**



Handwritten signature or initials

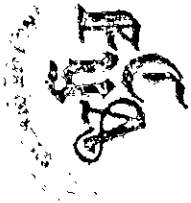
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Issuing Authority

BACHELOR STUDIES

H/3

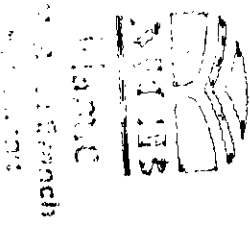
19



Frontier Children's Academy

Phase-IV Hayatabad, Peshawar. Tel: 8812089

Account No: 1721001176390001



Receipt No. E-048433

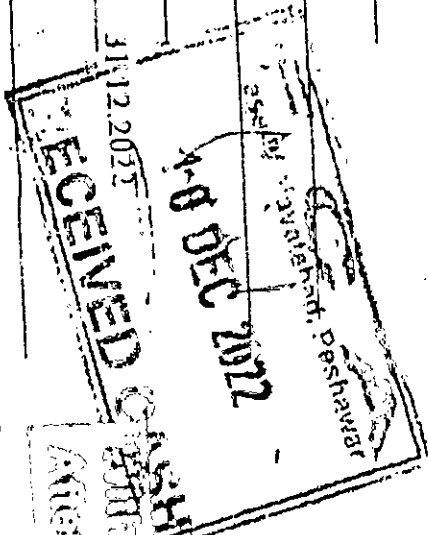
Student's Name: ALHA RAHMAN

Father's Name: SADIQ IFR REHMAN

Class: 101

Admission No. 8126-5-17

Due Date: _____



RECEIVED	CASH	07/12/2022	TO	11033333
After due date				
				RS 21 200.00

School FCGA

Term 2022-2023

20

(H/4)



Challans

Yahya Rahman



207099

Jamrud Campus, Pes...

Class 6 - Red

On-Roll

Past Challans

01
Jul

Rs 1,690/-

Jul 2023 - Jul 2023

Paid on 01-Jul-2023

01
Jun

Rs 1,690/-

Jun 2023 - Jun 2023

Paid on 01-Jun-2023

01
May

Rs 1,690/-

May 2023 - May 2023

Paid on 01-May-2023

Handwritten signature



14 21

GOVT. OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Email: sectionofficer.esf@gmu.k.com

091-9223588

Dated Peshawar, May 16th, 2023

(I)
Anwar

NOTIFICATION

NO.SO(S/F)E&SED/4-16/2022/Posting/Transfer: This Department's notification of even number dated 15.05.2023 in respect of Mst. Bibi Amina (BS-19) is hereby withdrawn, ab-initio.

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT.

Endst: of even No. & date:

- Copy forwarded to the:
1. Accountant General, Khyber Pakhtunkhwa, Peshawar
 2. Director, E&SE, Khyber Pakhtunkhwa Peshawar
 3. District Education Officers (Female), concerned
 4. District Accounts Officers, concerned.
 5. Director EMIS, E&SE Department for uploading at official website at the earliest.
 6. PS to Secretary, E&SE Department.
 7. Officer concerned.
 8. Office order file

SECTION OFFICER (S/F)

for

16/5/23

Q#

(22)

(7)
Amir

The Hon'ble Education Secretary,
Govt. of Khyber Pakhtunkhwa,
Peshawar.

Through Proper Channel.

Subject: Departmental Appeal/Representation against order, dated, May 16th, 2023, vide, which posting order, dated, May 15th, 2023 has been withdrawn ab-initio, on the basis of political consideration.

Respected Sir,

With profound respect, I beg to submit few lines against withdrawal of cancellation order, May 16th, 2023, based on political motivation in your honour: -

1. That applicant joined the service as a Subject Specialist in the year 2003 on the recommendation of Provincial Public Service Commission and with passage of time got promotion and was lastly promoted/posted as a Principal (BS-19) GGHSS Teri Karak, vide, order, dated, 15th March, 2023 in which partial modification was made, vide, order dated, May, 15th, 2023, in which Applicant was posted as a Principal at GGHSS Mathra, Peshawar instead of GGHSS Teri Karak. (Copy of the Order is hereby encsleod).
2. That consequent upon promotion & posting order, dated, May 15th, 2023, applicant assume the charge on 16th May, 2023 before impugn transfer order dated, 16 May, 2016 and even order of transfer was actualized on 01-06-2023 on eve of retirement of the then Principal Mst. Riffat Naseem and applicant took over the charge as a Principal GGHSS Mathra, Peshawar. (Copy of the Arrival report & Charge assumption as a Principal is herby encsleod).
3. That the applicant was satisfactorily discharging their duties and even salary has been released as a Principal GGHSS Mathra after punching of Salary & Pay fixation made by the District Account Office, Peshawar. (Copy of which is herby encsleod).
4. That since applicant is permanently settled in Hayat Abad Peshawar and even her husband is Senior Teacher (Math's) in Beacon house School Jamrud Campus having growing children and one of her daughter is studying in BS Political Science Islamia College, University and the others children are Studying in University and Schools in Peshawar which needs proper attention & care as a parents.

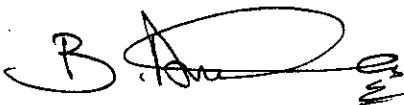
O.K.

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5. That due to utter shock and quiet astonishingly, after lapse of one & half months applicant came to know on 21st June, 2023, that posting/transfer order, dated, 15th May, 2023 has been withdrawn ab-initio retrospectively, vide, order, dated, May, 16th, 2023, purely on political motivation and totally against the posting & transfer policy notified by the Provincial Government.
6. That for the reason best known to the authority but apparently by managing political influence, the promotion and subsequent posting order purely on vacant post as a Principal GGHSS Mathra has been re-called/cancelled, in which applicant was recently promoted & transferred over the vacant post. Moreover, the impugn cancellation/withdrawal order is against the standing policy of posting & transfer policy as the applicant already assume the charge and even salary has been drawn.

It is therefore most humbly requested that impugn pre-mature transfer order, dated, May, 16th, 2023, may graciously be cancelled/withdrawn and applicant may kindly be allowed to perform duty as a Principal GGHSS Mathra in the interest of Public as well as based on spouse policy.

Yours Sincerely,

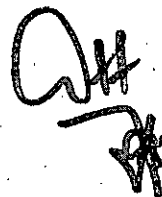


(Mst. Bibi Amina)

Principal GGHSS Mathra, Peshawar.

Copy to:

1. Secretary Elementary & Secondary Education, Civil Secretariat, Peshawar.
2. Director of Elementary & Secondary Education, Civil Secretariat, Peshawar.





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(K)
Amir

GOVT. OF KHYBER PAKHTUNKHWA

PRIMARY & SECONDARY EDUCATION DEPARTMENT

Email: sectionofficers1@gmail.com

091-9223588

Dated Peshawar the July 05th, 2023

No. SO(S/F) E&SED/4-16/2023

The Bior Amina Principal (BS-19)
GCHSS Mathra Peshawar

SUBJECT: DEPARTMENTAL APPEAL/REPRESENTATION AGAINST THE ORDER DATED 16-05-2023 VIDE WHICH POSTING ORDER DATED 15.05.2023 HAS BEEN WITHDRAWN AB INITIO ON THE BASIS OF PLITICAL CONSIDERATION.

I am directed to refer to your appeal received vide Secretary E&SE Department Dary No. 54 dated 20.05.2023 on the subject noted above and to state that your said appeal was examined and hereby rejected by the Competent Authority, please

(SHAWANA HALEEM)
SECTION OFFICER (S/F)

Encl. of even No. & Date:

Copy forwarded for information to PS to Secretary E&SE Department.

SECTION OFFICER (S/F)

Handwritten signature

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VAKALATNAM

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,

PESHAWAR.

Service Appeal No. _____/2023.

Mst. Bibi Amina.Petitioner (s)

Versus

Chief Secretary Khyber Pakhtunkhwa and others.

.....Respondent (s)

I/we hereby authorized **Mr. Farman Ullah Khattak Legal Advocate** Supreme Court of Pakistan (17-A) The Mall Peshawar Cantt, Peshawar), hereby appoint on behalf of Appellant, in the above noted Service Appeal before the Service Tribunal Khyber Pakhtunkhwa, **Peshawar**, to appear and defend this Writ Petition on my/our behalf and all proceedings that may be taken in respect of above noted petition any application connected with the same to file and take back documents, to accept the processes of the Court, to assist the Court and instruct Counsel, to represent the afore-said defendant in the above matter and to do all things incidental to such action for the afore-said Defendant (s)/opposite party.

The afore-said respondents (s)/opposite party hereby agrees/agree to ratify all acts done by the afore-said Advocate (Legal Counsel) in pursuance of this authority.

In witness whereof, I/we do hereunto set my/our hand(s) on this the 1st

July 2023.

ACCEPTED


14203-1987486-8
Signature of Client/Respondent.

(FARMAN ULLAH KHATTAK)
ADVOCATE, PESHAWAR.
Cell No. 0333-9121157
Bc-10-7589