

BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK, PESHAWAR.

Amended Service Appeal No. 1 /2029

**Dr.Salma Sami** ..... Appellant

**Versus**

Govt. of K.P through Chief Secretary & others..... Respondents


**INDEX**

S.No.	Description of documents.	Annex:	Pages.
1	Grounds of appeal.		1-6
2	Affidavit.		7
3	Addresses of the parties.		8
4	Application and order dt. 3.02.2021	A	9-13
5	Copy of the order dated 13.07.2021	B	14
6	Copy of order dt.14.12.2021	C	15
7	Copy of application	D	16
7	Copy of order dt.20.12.2021	E	17
8	Copy of order dt.14.09.2022	F	18-21
9	Copy of application and arrival report	G	22-24
10	Copy of relieving order dt.09.02.2022	H	25
11	Copy of order dated 10.07.2023	I	26-27
12	Copies of service certificate and departmental appeal	J-K	28-29
13	Wakalatnama.		30

Dated: 13.07.2023

Appellant

Through

  
**Muhammad Israr Khattak**  
Advocate High Court

1

BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK, PESHAWAR.

Amended Service Appeal No. 1 /2022

**Dr.Salma Sami**

Principal GGHS, Malogi, Peshawar..... Appellant

**Versus**

- 1) Government of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat, Peshawar.
- 2) Section Officer (School Female) Khyber Pakhtunkhwa, Peshawar.
- 3) Elementary and Secondary Education through Secretary Education, Civil Secretariat, Peshawar.
- 4) Mst.Noshaba, Ex.Principal GGHS, Irrigation Colony, Warsak Road, Peshawar.
- 5) Mst.Tahira Naz, Principal GGHS Gul Abad, Khyber.
- 6) Mst.Sughra Sadaf, GGHS Irrigation Colony, Peshawar.
- 7) Mst.Saima, GGHS Mian Gujar Peshawar..... Respondents

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**AMENDED** Appeal u/s 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 against the impugned transfer order dated 20.12.2021 of the appellant, whereby she has been illegally and unlawfully transfer and posted.

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***Respectfully Sheweth;***

Brief facts giving rise to the instant amended service appeal are as under:-

- 1) That the appellant is a naturally born bonafide citizen of Islamic Republic of Pakistan and hails from a respectable family of District Peshawar.

- 2) That the respondents No.1 to 3 vested too much time of the appellant in procedure for appointment in (BS-18) but the appellant continued her struggle for (BS-18) and the respondent No.1 ignoring, but finally the appellant approached to provincial Mohtasib Khyber Pakhtunkhwa against the respondent No.1 attitude, the then respondent No.1 issued order of appointment to appellant against the vacant post (BS-18) vide notification No.SO (S/F) E&SE 04.16.2021 in District Nowshera. (Application and order are attached as Annexure "A").
- 3) That the appellant is appointed/ posted against the vacant post (BPS-18) on dated 08.02.2021 as a principal GGHS Nodeh District Nowshera vide notification No.SO (S/F) E&SE 4-16-2021, but the post was not available in District Nowshera subsequently posted/ adjusted as principal (BPS-19) GGHS irrigation colony, Peshawar in her own pay and scale (as stopgap arrangement and the appellant taken over the charge against the vacant post as a principal (BPS-19) GGHS, irrigation colony, Peshawar on dated 13<sup>th</sup> July, 2021. (Copy of the order dated 08.02.2021 is attached as Annexure "B").
- 4) That the respondents No.1 and 2 after five months issued another order dated 14.12.2021 vide notification No.SO (S/F) E&SE 04.16.2021 against the appellant to adjust respondent No.4 and the appellant was transferred/ posted against the vacant post (BPS-18) as a principal GGHS Gulabad Jamrud, District Khyber, but the said post is yet not vacant because the said post is already occupied by Mst.Tahira Naz as a principal (BPS-18) in GGHS Gulabad, Jamrud, District Khyber. (Copy of order is attached as Annexure "C").
- 5) That after information to appellant through respondent No.5 the said post is not vacant but accepted by me from

dated 08.05.2021 vide order of No.SO(SF) E&SED (4.16.2021 posting/ transfer/ TC dated 07.05.2021 then the appellant moved application along with respondent No.5 posted order to respondents No.1,3 and requested for cancellation the transfer order of appellant against this occupied post. Meanwhile the respondent No.4 moved an application to respondents No.1 and 2 for non-availability of vacant post for serial No.2 in notification No.SO (S/F) E&SED 04.16.2021 and the respondent No.4 also mentioned vacant four posts in Peshawar, which is already vacant for (BPS-19). (Copy of application is attached herewith as Annexure "D").

- 6) That the respondents No.1 to 3 illegally, wrongfully and unlawfully issued another order against the appellant from District Peshawar to District Charsadda GGHS Matta Palangzai instead of GGHS Gulabad Jamrud District Khyber which is against the law is challenged by appellant. (Copy of order is attached as Annexure "E").
- 7) That during the pendency of this amended service appeal respondents No.1 to 3 issued order dated 14.09.2022 and transferred the appellant from irrigation colony to Malogi Peshawar against the vacant post but actually the post was already occupied by respondent No.6 so the transfer of appellant by respondents No.1 to 3 was clearly base upon dishonesty and malafide because respondents No.1 to 3 issued order dated 12.08.2022 in favour of respondent No.6 before one mother from the general order dated 14.09.2022. (Copy of order is attached as Annexure "F").
- 8) That after the arrival of appellant to Malogi Peshawar, respondent No.6 denied to give charge over this post then appellant again informed the respondents No.1 to 3 through application that the said transfer post is not vacant and appellant submitted application along with

arrival report to respondents No.1 to 3 and the arrival report also received by appellant from respondent No.6 but respondent No.6 never challenged this general order in any form. (Copy of application and arrival report is Annexure "G").

- 9) That respondents No.1 to 3 not resolved the matter of appellant rather issued another relieving order dated 09.02.2022 and the appellant forcibly relieved from irrigation colony and not forced/ compel respondent No.6 to give charge over the transferred post to appellant but the respondent remained silent and the appellant hanging in the air. (Copy of relieving order is Annexure "H").
- 10) That finally this Service Tribunal order dated 13.03.2023 and directed the respondents to actualize the general order dated 14.09.2022 when they acted upon an order of hon'ble Tribunal and respondents actualized the order and transferred the respondent No.6 from Malogi Peshawar to Mian Gujar Peshawar then respondent No.6 in the result of this order filed 12(2) against the appellant, after the acceptance of 12(2) application of the respondent No.6, this hon'ble Service Tribunal ordered and directed the appellant to amend the service appeal and implead the respondent No.6 and 7 which is impleaded in the instant service appeal. (Copy of order dated 10.07.2023 is attached as Annexure "I").
- 11) That before amendment the appellant filed departmental appeal on 16.12.2021 but respondent ignored the application of the appellant and continue his order, the appellant also attached her husband posting/ service certificate in Peshawar each and every things but in vain, then the appellant having no other remedy left, but to

approach this Hon'ble Court via instant amended appeal, on the following grounds. (Copies of service certificate and departmental appeal are attached as Annexure "J and K").

GROUNDS FOR APPEAL:

- a) That the appellant is permanent resident of Peshawar by domicile and her husband is also professor of BPS-20 in IER Peshawar permanently, so the transfer of the appellant is against the service rules and policy Act from District Peshawar to Charsadda.
- b) That the appellant did not fulfill/ complete the tenure of 3 years from the first appointment order in GGHS Irrigation Colony, Peshawar, it is also against the law and rules of Service Act.
- c) That the respondent No.4 gave four options in her application of the vacant post in Peshawar which were BPS-19 and the said four mentioned posts are also vacant from long time in Peshawar without any posted and the respondent No.4 according to law and requirement be transferred/ posted in these vacant post.
- d) That the appellant is a female gender which not possible to travel in daily routine 60 km in public transport with so many problems like security, transport unavailability etc.
- e) That the respondents No.1 to 3 bionomically transferring/ posting the appellant from one place to another without any legal and lawful reasons, which is clearly violation of the Service Policy and Rules.
- f) That any other grounds will be furnished at the time of final arguments with the prior permission of this Hon'ble Court.

For the aforesaid reasons, it is therefore, respectfully prayed that on acceptance of this Amended Service Appeal, this Hon'ble Tribunal may be pleased to kindly set aside the impugned order dated 20.12.2021, which is illegal, unlawful, coram-non-judice, malafide and of no legal effect and also ineffective on the rights of appellant, further the respondents No.1 to 3 may be directed to actualized the order dated 14.09.2022 accordance with law and allow the appellant to perform her duty in Peshawar.

Any other relief, which has not been specifically asked for and to whom the appellant is found entitled may also be granted.

Appellant

Through



**Muhammad Israr Khattak**  
Advocate High Court

BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK, PESHAWAR.

Amended Service Appeal No. \_\_\_\_\_/2023  
IN

S.A.No. \_\_\_\_\_/2021

**Dr.Salma Sami** ..... Appellant

**Versus**

Govt. of K.P through Chief Secretary & others..... Respondents

**AFFIDAVIT**

I, **Dr.Salma Sami** w/o Hafiz Muhammad Inamullah r/o Lahori Gate, Flat No.85, Mohallah Umar Farooq, Sheikh Abad, Peshawar, Principal GGHS, Malogi, Peshawar (appellant) do hereby affirm and declare on oath that the contents of the **Amended Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.



Deponent

CNIC No.16202-6959804-6



BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK, PESHAWAR.

Amended Service Appeal No. \_\_\_\_\_/2023

IN

S.A.No. \_\_\_\_\_/2021

**Dr.Salma Sami** ..... Appellant**Versus**

Govt. of K.P through Chief Secretary &amp; others..... Respondents

ADDRESSES OF THE PARTIESAPPELLANT:

**Dr.Salma Sami** w/o Hafiz Muhammad Inamullah  
R/o Lahori Gate, Flat No.85, Mohallah Umar Farooq,  
Sheikh Abad, Peshawar, Principal GGHS, Malogi, Peshawar

RESPONDENTS:

- 1) Government of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat, Peshawar.
- 2) Section Officer (School Female) Khyber Pakhtunkhwa, Peshawar.
- 3) Elementary and Secondary Education through Secretary Education, Civil Secretariat, Peshawar.
- 4) Mst.Noshaba, Ex.Principal GGHS, Irrigation Colony, Warsak Road, Peshawar.
- 5) Mst.Tahira Naz, Principal GGHS Gul Abad, Khyber.
- 6) Mst.Sughra Sadaf, GGHS Irrigation Colony, Peshawar.
- 7) Mst.Salma, GGHS Mian Gujar Peshawar

Appellant

Through



**Muhammad Israr Khattak**  
Advocate High Court

10

**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
**Elementary and secondary education department**

7

Dated Peshawar the July 13<sup>th</sup> 2021

Notification”

**No. SO(S/F)/E&SE/4-16/2021/Salma Sami:** consequent upon the appointment of Dr. Salma Sami (BS-18) vide notification of even number dated 08.02.2021. she is hereby posted as principal GGHSS Nodeh District Nowshera for actualization against the vacant post and subsequently posted/adjusted as principal (BS-19) GGHSS Irrigation Colony, Peshawar in her own pay and scale (as stop gap arrangement)

i. **No. TA/DA is allowed.**

**SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA**  
**E&SE DEPARTMENT**

Endst: of even NO. & Date:

Copy forwarded for information to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar
2. Director E&SE Khyber Pakhtunkhwa, Peshawar
3. District Education Officers (Female) Nowshera
4. District Accounts Officer, Nowshera
5. Director EMIS, E&SE Department
6. PS to secretary, E&SE Department
7. Officer concerned.
8. Office order file.

**(Hafeez ur Rehman Shah)**

**Section Officer (S/F)**

SA

محرمت جناب صوبائی محتسب صاحب لاہور جسید بخشون خوا

عنوان: درخواست عہدہ تقرری بطور پرنسپل پوائس پرنسپل (خاتون-BS-18)

جناب عالی

بعد از خواری و ایانت بسیار، امید ہے طور پر وطن عزیز

کے اس موثر ادارہ میں عہدہ کرتی ہوں

1. استعمار علیہ 09/2017 کے لیے پبلک سروس کمیشن کے تحت 2018 میں منعقدہ

تجربہ امتحان اور انٹرویو میں کامیابی حاصل کی

2. 9 مئی 2019 کے مراسلہ کے تحت 23 مئی 2019 کو میڈیکل سرٹیفکیٹ حاصل کیا 2 حوالہ صفحہ 1-2

3. بار بار پتہ کرنے پر معلوم ہوا کہ تقرری کی منظوری (Approval) کے لیے جناب وزیر اعلیٰ کے پاس جانے کے لیے تیار ہے۔ جبکہ مختلف حیلے و بیان سے

میری مائل ڈائریکٹوریٹ آف ایملیٹری اینڈ سٹینڈری ایجوکیشن میں روانگی کی تھی آج 19 نومبر 2019 میں ان کے ہر نقطہ کی تکمیل کی اور منظوری کی مائل سکرپٹری کے دفتر جمعوائی گئی

4. اس تسلی ہوئی کہ تقرری کی منظوری ہو جائے گی مئی 2020 میں سکرپٹری کے دفتر میں مصائب و آلام برداشت کرتے ہوئے معلوم ہوا کہ منظوری کی

مائل تو ابھی تک وہیں پڑی ہوئی ہے۔

5. مئی 2019 میں تقرری کی منظوری کی مائل اللہ اللہ کرے چیف سکرپٹری کے دفتر پہنچی۔ جناب چیف سکرپٹری اور سکرپٹری کے درمیان اس پر دفتری

کارروائی ہوئی رہی۔

6. آج 19 نومبر 2020 کو جناب وزیر اعلیٰ صاحب نے تقرری کی منظوری (Approval) دے دی اور کچھ اطمینان ہو کر ستا یہ اب کام آسان ہو گیا

7. 19 نومبر 2020 سے فروری 2021 تک مائل کیجور سے غائب ہوا اور بعد از تلاش

بسیار 8 فروری 2021 کو نوٹیفیکیشن کے ذریعہ تقرری (Appointment)

بلور خاتون پرنسپل BS-18 میں کی گئیں (posting) ہیں کی۔ (منسلک کے حوالے)

(3/54)

AA

1/3

8. اس نوٹیفیکیشن کے ایس کے مسئلے کو جنم دیا اور میں نے 9 فروری کو صرف  
Approval ریورٹ جمع کرائی۔ (مسند حوالہ 4)

12

9. بعد از خوارک بسیار ڈائریبلٹیورٹ کی طرف سے proposal for Adjustment  
میں نوٹیفکیشن گزرتا ہے سیکرٹری سکول ایجوکیشن کالونی لاہور کو propose کیا گیا  
یا دوسرے نہ مندرجہ علیہ حالی سے۔ (مسند حوالہ 5)

13

10. 22 فروری 2019 سے مسلسل رابطہ میں رہتے ہوئے کمیونٹی ہسپتال لگ رہا تھا  
اور درخواست پر درخواست جمع کرائی

11. آخر کار 29 مارچ 2019 جناب سیکرٹری صاحب سے ملاقات کی اور انہوں نے  
یقین دہانی کرائی کہ عمل آپ کا کام ہو جائے گا تا کہ ایک ساتھ ہونے تکمیل و زیادت  
کا از البربح سک (مسند حوالہ 6)

12. 30 مارچ 2019 کو صبح سے لیکر شام تک انتظار کیا اور آخر کار سیکرٹری  
نے اصرار کیا اور مطلوبہ رجسٹر شدہ خطہ پر Actualization سے لیکر  
جناب عالی

میں مکمل مابوس ہو گئی ہوں لیکن صدر مملکت کے خطاب میں ایک موقر ادارے  
کا ذکر حیدر ہوا تو میں نے سوچا کہ آپ سے بھی رجوع کر لوں

مئی 2019 سے میری فائل کو مختلف حیلوں بیانوں اور دفتری کارروائی سے  
ڈائریبلٹیورٹ اور سیکرٹریٹ میں تختہ مشق بنایا گیا۔ میرے ساتھی 100 سے زیادہ  
خواتین 2 سال سے زیادہ عرصہ خدمات انجام دے چکی اور میرا معاملہ ابھی  
تک تختہ مشق بنا ہوا ہے۔

سیکرٹری تعلیم کے رویہ پر بھی انتہائی دکورامتوں سے کہ انہوں نے مسلسل  
میری اپانٹ کی حالانکہ میں ایک اعلیٰ تعلیم یافتہ بی ایچ ڈی ڈگری کی حامل  
خاتون ہوں اور ایک نہایت اعلیٰ تعلیم یافتہ خاندان سے تعلق رکھتی ہوں  
اور اپنے سکول میں بھی ایک قابل استاذی حیثیت سے جانی جاتی ہوں

ATTESTED

آپ نے حکم سے قبل دوران تحریر مجھے یہ بھی جڈ سننے دیے کہ میری تقرری دوسرے  
صانع میں کسی ایسی حکم کی جائے گی کہ میں مجبوراً نوکری کو حیدرآباد ہی لے دوں  
یہ امر ملحوظ نظر رہے کہ میرا تعلق لیتا اور شہر ہی سے ہے اور میرے  
شہر ہی جامعہ ریشاد میں مستقل ملازمت پر فائز رہے۔

13

6

ازراہ رسم آپ سے درخواست ہے کہ

دسمبر 2018 سے آج 29 مارچ 2021 تک مجھے مستقل

شدید ذہنی اذیت کا سامنا ہے۔

درخواست ہے کہ میری ایڈجسٹمنٹ پور پورل کے مطابق کی جائے  
اور میری سنیارٹی 22 مئی 2019 سے مقرر کی جائے۔ یا لیتا اور  
ہی میں بطور English - SS تقرری کی جائے۔

الکدر مر  
والسلام مع الاحترام  
ڈاکٹر سلیمی سمیع

مستقل تہہ: شیخ آباد عنبر 4 بیرون لاہوری گلیٹ ٹی ڈر شہر  
تعمیری: English - SS فورمنٹ ٹرکڈ بائی سکول  
حوالہ وارہ ٹی ڈر

فون: 0300-5941337

ATTESTED

AMK "13"

14



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT

Dated Peshawar the July 11, 2021

7

NOTIFICATION

No. SO(SF)/E&SE/4-16/2021/Salma Sami: Consequent upon the appointment of Dr. Salma Sami (BS-18), vide notification of even number dated 08.02.2021. She is hereby posted as Principal GGHSS Nodoh District Nowshera for actualization against the vacant post and subsequently posted/adjusted as Principal (BS-19) GGHSS Irrigation Colony Peshawar. Her pay and scale (as stop gap arrangement).

No TADA is allowed.

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT

List of even No. & date:

Copy forwarded for information to the:

- Accountant General, Khyber Pakhtunkhwa, Peshawar.
- Director, E&SE Khyber Pakhtunkhwa, Peshawar.
- District Education Officers (Female) Nowshera
- District Accounts Officer, Nowshera
- Director EMIS, E&SE Department.
- Asst. Secretary, E&SE Department.
- Other concerned.
- Other order file.

*Altaf Ahmad*  
*Verifical*

22/9  
ASSISTANT DIRECTOR  
Provincial Ombudsman  
Secretariate  
Khyber Pakhtunkhwa

(Hajir Us Rehman Shah)  
SECTION OFFICER (SF)

INFIX HOT 10

ATTESTED



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar  
Phone No: 091-9223588

15

Dated Peshawar the December 14<sup>th</sup>, 2021

**NOTIFICATION**

**NO. SO(SF)E&SED/4-16/2021/POSTING/TRANSFER/TC:** The Competent Authority, in light of the Judgment of the Khyber Pakhtunkhwa Service Tribunal Peshawar dated 25-06-2021 in Service Appeal No-10297/2020, is pleased to order the following posting / transfer, with immediate effect, in the public interest: -

Sr. No	Name & designation	From	To
1.	Mst. Noshaba, Principal (BS-19)	GGHS Kernal Sher Khan Swabi.	Principal GGHS, Irrigation Colony, Warsak Road Peshawar (Vice No-2)
2.	Dr. Salma Sami, Principal (BS-18)	GGHS, Irrigation Colony, Warsak Road Peshawar	Principal GGHS Gulabad Jamrud, Khyber against the vacant post.

SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT

**Endst: of even No. & date:**

Copy forwarded for information to the: -

1. Registrar Khyber Pakhtunkhwa Service Tribunal, Peshawar.
2. Accountant General, Khyber Pakhtunkhwa, Peshawar.
3. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
4. District Education Officer (Female) Peshawar, Swabi & Khyber.
5. District Accounts Officer Swabi & Khyber.
6. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
7. Section Officer (Litigation-II), E&SE Department, Khyber Pakhtunkhwa.
8. PS to Minister for E&SE, Khyber Pakhtunkhwa.
9. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
10. Principal concerned.
10. Master file.

*(Signature)*  
14/12  
(SAMIRA MEHSOOD)  
SECTION OFFICER (SCHOOLS FEMALE)

*(Signature)*  
ATTESTED

To

The Honourable Secretary to Govt. of Khyber Pakhtunkhwa  
Elementary and Secondary Education Department.

ANX 13

13

Subject:- NON AVAILABILITY OF POST FOR SERIAL NO. 2 IN NOTIFICATION NO. SO(S/F) E&SED/4-16/2021/POSTING/TRANSFER/TC, DATED 14.12.2021

R/Sir,

It is submitted for your kind information that above mentioned post is already occupied by Mrs. Tahira Naz, Principal BS-18 by Notification No. SO(S/F)E&SED/4-16/2021/Posting/Transfer/TC, dated 14.12.2021.

Therefore, I cannot take over charge at GGHS Irrigation Colony Warsak Road Peshawar. As there are other vacant posts of Principal BS-19 in District Peshawar therefore I may kindly be adjusted to one of the following vacant posts:-

1. GGHS Dabgari Banat Peshawar (Principal BS-19) will be retired on 31.12.2021
2. RPDC (F) Peshawar (Senior Instructor BS-19)
3. GGHS Civil Colony Peshawar (Principal BS-19):

4. GGHS Landli Arbab Peshawar.  
I have no reservations on my adjustment.

Thanking you in anticipation.

Dated 16.12.2021

Noushaba  
(Mst: Noushaba)  
Principal BS-19  
GGHS KSK Swabi

~~AA~~

Received  
AA sent

1876  
17/12





AW\* E\*  
GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar  
Phone No. 091-9223588

Dated Peshawar the December 20<sup>th</sup>, 2021

**NOTIFICATION**

**NO. SO(SF)E&SED/4-16/2021/POSTING/TRANSFER/TC:** In partial modification of this Department's Notification of even number dated 14-12-2021, the place of posting of Dr. Salma Sami Principal (BS-18) may be read as GGHS Matta Palangzai District Charsadda instead of GGHS Gulabad Jamrud District Khyber. (17)

SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT

**Endst: of even No.& date:**

Copy forwarded for information to the: -

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Female) Peshawar, Swabi & Khyber.
4. District Accounts Officer Swabi & Khyber.
5. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
6. Section Officer (Litigation-II), E&SE Department, Khyber Pakhtunkhwa.
7. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
8. Mst. Tahira Naz Afridi Principals, GGHS Gulabad Jamrud, Khyber.
9. Principals, GGHS Matta Palangzai District Charsadda.
10. Officer concerned.

(SAMIRA MEHSOOD)  
SECTION OFFICER (SCHOOLS FEMALE)

ATTESTED

GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT  
BLOCK A OPPOSITE MPAS HOSTEL, CIVIL SECRETARIAT, PESHAWAR  
PHONE NO 091-9223588

5

18

Dated Peshawar, September 14<sup>th</sup>, 2022

NOTIFICATION

'F'  
ANX

NO.SOS/FE&SED/4-16/2022/Posting/Transfer/51: Upon their promotion vide notification  
No.SOS/FE&SED/2-3/2022/Promotion dated:20.04.2022 the following Teaching Cadre (BS-19)  
Officers are hereby posted against the post mentioned against each.

Sr. #	Name/ Designation	Present Posting	To	Remarks
1	Mst. Atia Bano	GGHSS Dhamtor Abbottabad	GGHSS Sherwan Abbottabad	AVP of Principal (BS-19)
2	Mst. Tahira Tabassum	GGHSS Shahdand Baba Mardan	GGHSS Jalala Mardan	AVP of Principal (BS-19)
3	Mst. Sahira Kalsoom	GGHSS Labor Swabi	GGHS Panjpir Swabi	Vice Sr. No.12
4	Mst. Noreen Afzal	RPDC (Female) Peshawar	GGHS Prang Charsadda	AVP of Principal (BS-19)
5	Mst. Azra Begum	RPDC Malakand	RPDC Malakand	Against Sr. No.45
6	Mst. Gul E Rana	GGHSS Jogiwara Peshawar	GGHS KSK Swabi	AVP of Principal (BS-19)
7	Mst. Alia Iqbal	GGHSS Chaunkani Peshawar	Shakar Dara Kohat	AVP of Principal (BS-19)
8	Mst. Amireen Farima	GGHSS No.2 D.I Khan	GGHSS Jandola Tank	AVP of Principal (BS-19)
9	Mst. Nusrat Parveen	GGHSS No.6 D.I Khan	GGHSS Karak No.1	AVP of Principal (BS-19)
10	Mst. Salima	GGHSS Toru Mardan	GGHSS Palai Malakand	AVP of Principal (BS-19)
11	Mst. Shabana Rehman	GGHS No.1 Lakki Marwat	GGHSS No.1 Serai Nurang Lakki Marwat	Vice Sr. No. 42
12	Mst. Zubaida Bibi	GGHSS Panjpir Swabi	GGHS Zaida Swabi	AVP of Principal (BS-19)
13	Mst. Ummeeda Saleem	GGHSS University Town Peshawar	GGHSS Matta Palanzai Charsadda	AVP of Principal (BS-19)
14	Mst. Shaheen Shehriaz	GGHS Takhli Nasrati Karak	GGHS Chokara Karak	AVP of Principal (BS-19)

SA

GOVERNMENT OF KHYBER PAKHTUNKHWA

ELEMENTARY & SECONDARY EDUCATION DEPARTMENT  
BLOCK A DEPT. GELI AMPA-SHOSHEE CIVIL SECRETARIAT PESHAWAR  
PHONE NO. 091-9274388

19

15	Mst. Gul F. Rana Sidiq	GGHSS BSD Peshawar	GGHSS No.1 Hanju	AVP of Principal (BS-19)
16	Mst. Saeeda Tabassum	GGHSS Kotli Swabi	GGHSS Shewa Swabi	AVP of Principal (BS-19)
17	Mst. Bibi Amina	GGHSS Parkho Dheri Mardan	GGHSS Hathian Mardan	AVP of Principal (BS-19)
18	Mst. Banaras Begum	GGHSS Akora Khattak Nowshera	GGHSS Totakan Malakand	AVP of Principal (BS-19)
19	Mst. Yasmin Aza Bibi	GGHSS Shahdand Baba Mardan	GGHSS Rustam Mardan	AVP of Principal (BS-19)
20	Mst. Shamila Tabassum	GGHSS Naivala D.F Khan	GGHSS Ismaili Mama Khel Bannu	AVP of Principal (BS-19)
21	Mst. Jamila Begum	GGHSS Matkari Malakand	GGHSS Dheri Allqand Malakand	AVP of Principal (BS-19)
22	Mst. Shaista Kanwal	GGHSS Jungle Khel Kohat	GGHSS Gumbat Kohat	AVP of Principal (BS-19)
23	Mst. Irshad Begum	GGHSS No.4 Bannu City	GGHSS Bilawar Khan Bannu	AVP of Principal (BS-19)
24	Mst. Farah Deba	GGHSS Lahore Swabi	GGHSS Kalukhan Swabi	AVP of Principal (BS-19)
25	Mst. Farzana Yasmin	GGHSS Jungle Khel Kohat	GGHSS Qamar Zaman Mandew-Bannu	AVP of Principal (BS-19)
26	Mst. Shaista Gul	GGHSS University Town Peshawar	GGHSS Mandani Charsadda	AVP of Principal (BS-19)
27	Mst. Romaisa Sadia	GGHSS Sahibzada Umar Khan Shaheed Peshawar	GGHSS Tehkal Peshawar	AVP of Principal (BS-19)
28	Mst. Farhana	RPDC Swabi	GGHSS Kunda Swabi	AVP of Principal (BS-19)
29	Mst. Sadaf Rehana Malik	GGHSS Comprehensive Abbottabad	GGHSS Siri Kot Haripur	AVP of Principal (BS-19)
	Mst. Syeda Taryaba	GGHSS Comprehensive Abbottabad	GGHSS Kot Najibullah Haripur	AVP of Principal (BS-19)
31	Mst. Shagufta Khanam	GGHSS BSD Peshawar	GGHSS Titter Khel Lakki Marwat	AVP of Principal (BS-19)
32	Mst. Iflat Begum	GGHSS Sahibzada Umar Khan Shaheed Peshawar	RPDC Peshawar	AVP of Principal (BS-19)

**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
 ELEMENTARY & SECONDARY EDUCATION DEPARTMENT  
 BLOCK A OPPOSITE MP/AS HOSTEL, CIVIL SECRETARIAT PESHAWAR  
 PHONE NO 091-9223588

7

20

33	Mst. Sughra Sadaf	DPD Peshawar	GGHSS Irrigation Colony Peshawar.	Vice Sr.44
34	Mst. Nasrat Hussain	GGHSS Gandhi Habibullah Manshra	GGHSS Thathi Khurd Manshra	Vice Sr. No. 41
35	Mst. Samra Danish	DCHE Abbottabad	GGHSS Balakot	AVP of Principal (BS-19)
36	Mst. Roshan Ara	GGHSS Ningolai Swat	GGHSS Matta Swat	AVP of Principal (BS-19)
37	Mst. Ishrat Jabeen	GGHSS BSD Peshawar	GGHSS Jamrud Khyber	Vice Sr. No.43
38	Mst. Robina Farooq	GGHSS Dhamtor Abbottabad	GGHSS KTS Sector No. 2 Haripur	AVP of Principal (BS-19)
39	Mst. Zah Jehan	GGHSS Chamkani Peshawar	GGHSS Saidu No. 1 Swat	AVP of Principal (BS-19)
40	Mst. Shela Nauman	GGHSS University Town Peshawar	GGHSS Koper Malakand	AVP of Principal (BS-19)
<b>CONSEQUENTIAL POSTING</b>				
41	Mst. Fehmida Malik, Principal (BS-18) working against the post of (BS-19) in OPS	GGHSS Thathi Khurd Manshra	GGHSS Darband Manshra	AVP of Principal (BS-18)
42	Mst. Shahana Nooren, (BS-18)	GGHSS Semi Naurang Lakki Marwat	GGHSS No. 06 D/A Khan	Vice Sr. No. 09
43	Najma Noz, Principal (BS-18)	GGHSS Jamrud Khyber	DPD Peshawar	Vice Sr. No.33
44	Dr. Salma Sami Principal (BS-18)	GGHSS Irrigation Colony	GGHSS Malogi, Peshawar	AVP of Principal (BS-18)
45	Dr. Dil Ara Begum Principal (BS-19)	Instructor (BS-19), RPDC (Female) Malakand	RPDC (Female) Malakand (BS-20)	Against Vacant Post of Principal (BS-20) in OPS.

RA

GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT  
BLOCK A OPPOSITE MPAS HOSTEL, CIVIL SECRETARIAT PESHAWAR  
PHONE NO 091-9223588

3

21

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT

Encls: of even No. & date:

Copy forwarded to the:

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

*Muhammad Faizan Zeb*  
(MUHAMMAD FAIZAN ZEB)  
SECTION OFFICER (S/F)

~~3~~

To

The Secretary  
Elementary and Secondary Education  
Department KPK

ANNEX "A"

(22)

Subject:- Transfer Consequential/Posting.

Reference your good office order NO.SO(SF)E&SED/4-16/2022/Posting/Transfer/51: Dated Peshawar, September 14<sup>th</sup>, 2022

I have been transferred to GGHSS Malogo, Peshawar on the post of Principal (BS-18) I reported my arrival in the respective school here I have been aware that the post has already been occupied/ Filled by Mst, Saima Principal (BS-18 vide your notification NO.SO(SF)E&SED/4-16/2022/Posting/Transfer/ 36: Dated Peshawar August 12<sup>th</sup>, 2022: (her office order DDO Ship copy annexed as reference)

Therefore it is requested kindly adjust me on my present post i.e. in GGHSS Malogo Peshawar.

Yours Sincerely,

*Salma*  
15/9/22

Encls  
As above :

Dr, Salma Sami (Principal)  
GGHS Irrigation Colony Peshawar

PRINCIPAL  
GGHS Irrigation Colony Peshawar

*AS*

SECRETARY DIARY

No. 2927

Dated 15.9.2022

Arrival Report

Ref Notification No SO(SIF) EBSE/  
4-16/2022/ posting / transfer / 51  
dated 14-09-2022

I hereby submit my arrival reports  
as principal GHS Malogi Peshawar  
w.e.f 15-09-2022 (BN)

Dr. Salma Sami <sup>Salma</sup>  
Principal 15/9/22


Received  
Principal  
GHS Malogi  
Peshawar  
15/09/2022

~~Signature~~

24

ARRIVAL REPORT


In compliance of Elementary & Secondary Education notification NO.SO(S/F)E&SED/4-16/2023/Posting/Transfer dated 17.04.2023 I, Dr. Salma Sami arrived at GGHSS Malogo Peshawar on 17.04.2023.

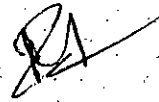
  
Dr. Salma Sami  
Principal (BS-18)

Copy forwarded to;

1. Secretary E&SE Department Khyber Pakhtunkhwa Peshawar.
2. Accountant General Khyber Pakhtunkhwa.
3. Director Elementary & Secondary Education Khyber Pakhtunkhwa.
4. District Education Officer (F) Peshawar.
5. School concerned.

I, Mst. Saima Principal GGHSS Malogo,  
received arrival report of Mst. Salma Sami  
according notification NO.SO(S/F)E&SED/4-16/2023/  
posting/Transfer dated 17.04.2023.

  
PRINCIPAL  
(M.A. Eng. M.Ed.)  
G.H.S.S. Malogo Peshawar.  
17/04/2023







25

ANX (H)

**GOVT. OF KHYBER PAKHTUNKHWA**  
**ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**

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

091-9223588

Dated Peshawar, February 9<sup>th</sup>, 2022

**RELIEVING ORDER**

**NO.SO(S/F)E&SED/4-16/2022/Posting/Transfer/:** Consequent upon the posting/transfer Notification dated 14.09.2022, Mst. Salma Sami Principal (BS-18) appearing at sr. No.44 is hereby relieved from GGHSS Irrigation Colony Peshawar from the post of Principal (BS-19).

**SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA**  
**E&SE DEPARTMENT**

**Endst: of even No.& date:**

Copy forwarded to the:

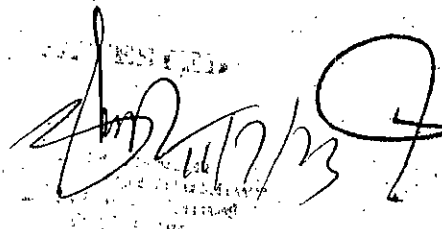
1. Accountant General, Khyber Pakhtunkhwa for further necessary action.
2. Director, E&SE, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Female) Peshawar.
4. Director EMIS, E&SE Department for uploading at official website at the earliest.
5. PS to Minister for E&SE Department, Khyber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

*SA*


  
(SHAWANA HALEEM)  
SECTION OFFICER (S/F)

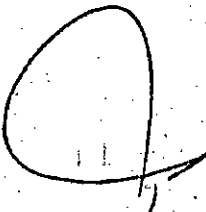
10<sup>th</sup> July, 2023

1. Learned counsel for the petitioner present. Mr. Fazal Shah Mohmand, Additional Advocate General alongwith Mr. Fahim Khan, Assistant for official respondents No. 2, 3 and 4 and counsel for private respondent No. 1 present while private respondent No.5 and 6 have already been placed ex-parte.
2. When confronted with the situation that the order dated 14.09.2022 produced before the Tribunal on 13.03.2023, the learned counsel for the appellant in the main appeal had submitted that if a direction was given to the respondents to actualize posting/transfer notification dated 14.09.2022, he would not press the appeal and the appeal was accordingly decided. While the notification dated 14.09.2022, showed the post of Principal, GGHSS Malogo Peshawar as vacant and Dr. Salma Sami was posted there-against but the petitioner, Mst. Saima, contended that she had already been occupying the post of the Principal, GGHSS Malogo Peshawar vide notification dated 12.08.2022 and that was not vacant as wrongly shown by the department, to which learned counsel for private respondent has very fairly and frankly submitted that the notification of the petitioner Mst. Saima was already on the file and the factum of her posting was also brought in the notice of Tribunal at that time but that was not somehow or the other properly taken notice of at that time. The learned counsel for private respondent has further informed that there was another lady named Sughra Sadaf whose impleadment application was on the file and the mention of such fact was also found in the order sheet dated 13.03.2023 but she has not been made party so far. He submitted that if the application under 12(2) of the CPC was accepted and order dated 13.03.2023 was set aside then Sughra Sadaf also needed to be impleaded.




3. As the factum of the order dated 12.08.2022 pertaining to posting of the petitioner Mst. Saima against the post of Principal, GGHSS Malogo, Peshawar could not be discussed or taken notice by the Tribunal at the relevant point of time i.e. on 13.03.2023 and because of that some disturbance has been created, compelling the petitioner to file this petition, therefore, let the appeal be decided on merits and while allowing this application we set aside the order 13.03.2023 direct the appellant of the main appeal to array the petitioner as party, similarly the applicant Sughra Sadaf, whose right may also be affected because of the transfer orders, shall also be arrayed as respondent. To come up on 14.07.2023 before D.B. Notice be issued to Sughra Sadaf. The appellant Salma Sami shall file amended appeal within two days. P.P given to the parties. The learned counsel for the petitioner made a further request that till the disposal of appeal, the operation of orders shown to have been passed in compliance with the order dated 13.03.2023 might be suspended as there are anomalies created because of the order dated 14.09.2022. In this respect the respondents representative present in the court is directed to resolve the matter and submit report on the next date.

  
 (Fareeha Paul)  
 Member (Executive)

  
 (Kalim Arshad Khan)  
 Chairman

10/07/23

\*Adnan Shah\*

  
 11/7/23

Date of P.P.  
 Issued

Page 2 11/7/23  
 15/7/23

Shehzad  
 11/7/23  
 11/7/23

To

The Secretary  
Elementary and Secondary Education  
Department KPK

28

ANX<sup>ce</sup> (1)

**Subject:- Appeal For Conselition against the order Dated 20-12-2021 vide Notification  
No.SO(SF)E&SED/4-16/2021/POSTING /TRANSFER/TC:**

Appellant. *Salma*

R/Sir

1. That the appellant is transferred /posted against the vacant post GGHS Gulabad District Jamrud Khyber but the said post is already occupied by Mst, Tahira Naz in GGHS Gulabad.
2. That the appellant reached to the said post which as ordered to appellant but the principal Mst, Tahia Naz informed the appellant that the GGHS Gulabad post is not vacant but on this post already appointed me as principal on dated 08-05-2021 which is still I principal of the GGHS Gulabad Jamrud, Khyber.
3. That the appellant again transferred/post to GGHS Matta Palangzai District Charsadda instead of GGHS Gulabad, which is against the policy/rules of the service ACT 1974

Therefore I humbly request to cancel my order against the order dated 20-12-2021 vide Notification No. SO (SF) E&SED/4-16/2021/POSTING /TRANSFER/TC: and arranged the appellant in District Peshawar.

Thanking you in anticipation

Yours Sincerely,

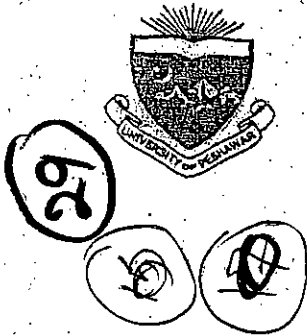
Encls  
As above

*P.A. Secy*

*Salma*  
**Salma Sami** (Principal)  
GGHS Irrigation Colony Peshawar.

D NO 2269

28/12



**UNIVERSITY OF PESHAWAR**

**SERVICE CERTIFICATE**

No. 1969 Estt

Dated 15/09/2021

(15)

ANK

This is to certify that Mr./Ms. Dr. Hafiz Muhammad Inamullah  
Designation Professor (Tenured) Department/ College/ School/ Section  
I.E.R is/ was a permanent employee of the  
University of Peshawar.


RECEIVED

He/ She is/ was working in the University of Peshawar since 1-03-2011 to  
date

He/ She is/ was drawing Basic Pay @ Rs. \_\_\_\_\_ P.M. in BPS (TTS)

[Signature]  
Assistant Registrar (Estt)  
University of Peshawar  
15/09/21

[Handwritten mark]

قیمت 50 روپے	74013			
ایڈویکٹ: <u>گداسرار</u>		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل ایسوسی ایشن نمبر: <u>49000-14-131</u>				
رابطہ نمبر: <u>03329085684</u>				

بعدالت جناب: محترم سر جسٹس محمد نواز خان

مخانب: <u>اسلام آباد</u>	دعویٰ:
	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:

**باعث تحریر آنگہ**

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ  
 آن مقام محترم سر جسٹس محمد نواز خان کو مکمل مقرر محترم سر جسٹس محمد نواز خان کو مکمل مقرر  
 کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو  
 راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق  
 زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز  
 دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی  
 کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب  
 مقرر شدہ کو وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا ساختہ پرداختہ منظور و قبول ہوگا  
 دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام ذورہ یا حد سے  
 باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

۱۴-۶-۲۰۲۳  
 الع محمد نواز خان الع  
 بد گواہ شد بد  
 کے لیے منظور ہے۔

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