

BEFORE THE SERVICE TRIBUNAL PESHAWAR

Appeal No. ¹⁴²³ 37/2023

Shabana mir

Versus

Edu, Govt etc

INDEX


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Dated 25/09/2023

Petitioner

Through

Council


Sadullah Marwat


Arbab Saif Ul Kamal

(1)

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No.1423/2023

Shabana Mir. Vs. Chief Secretary etc.

WRITTEN REPLY FOR AND ON BEHALF OF
RESPONDENT NO.5

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 7903

Dated 26-09-23

Respectfully Sheweth:

Preliminary Objections:

- a. That interim order dated 30.03.2023, came in favour of appellant against respondent No.5 has never let the post at GGHS Dab Kor. (Copy as annex "R").
- b. - That the Principal of the school, being real sister of the appellant, favours illegally and in violation of law facilitating her in the matter.
- c. That explanation of appellant's sister Principal was called by the authority regarding non-compliance of the official order vide letter dated 28.08.2023. (Copy as annex "R/1").
- d. That writ petition of appellant is pending disposal on the same subject matter before Hon'ble Peshawar High Court, Peshawar.

ON FACTS:

1. In response to para No.1 of the appeal, respondent No.5 was already performing her duties at the said school, GGHS Dab Kor Mohmand, while appellant was also performing her official duties in the said school for more than 13 years.

2. In response to para No.2 of the appeal, appellant viz-a-viz respondent No.5, both were performing their duties against General Cadre in GGHS Dab Kor. Respondent No.5 was transferred without any plausible reason from GGHS Dab Kor to GGHS Ilam Kor. Such transfer was made after induction of fresh candidates.

The said order was, however, withdrawn by the competent authority and then respondent No.5 was again restored to GGHS Dab Kor and as a consequence of the same, appellant was transferred and posted at GGHS Ilam Kor.

Here it would not be out of place to mention that it was internal arrangement of the administration by transferring one teacher and other.

3. In response to Para No.3 of the appeal, the said transfer was at GGHS Ilam Kor was cancelled by the authority and the respondent No.5 was restored to her original post in the school at GGHS Dab Kor.

No political influence was ever exerted over the authority.

4. Not correct, appellant being Civil Servant, shall perform her official duties anywhere.

The respondent No.5 was permanently residing at Mohmand while appellant was hailing from District Bannu. Order dated 27.03.2023 restoring respondent No.5 to her original post was withdrawn

for the reason given therein. The said order dated 27.03.2023 was again cancelled on 29.03.2023 by the said authority restoring appellant to GGHS Dab Kor.

5. Not correct, while knowing the reason of cancelling of order dated 29.03.2023, the same was withdrawn from the date of issuance i.e. 29.03.2023 was again withdrawn on 30.03.2023 in favour of respondent No.5.
6. Not correct, being Civil Servant, appellant or as the case may be, shall serve anywhere at any station. Appellant never assumed the charge of any assignment due to favour of Principal being real sister of appellant since the posting of appellant in the school at Dab Kor.

ON GROUNDS:

- A. Not correct, notification dated 30.03.2023 is not violative of any law on the subject and as far as the posting and transfer policy is concerned, the same has no legal value in presence of settled law, regarding posting and transfer of Civil Servant. As far as marital aspect of appellant is concerned, she belongs to District Bannu and cannot claim her states at GGHS Dab Kor for posting.
- B. Not correct it is for the authority to post someone at any station and appellant cannot claim the post as a vested right.

(4)

No political pressure was ever made regarding the subject matter by respondent No.5, but it was the appellant who did so.

- C. Not correct and as stated earlier, posting and transfer policy has no legal value when law on the subject exists.

Posting and transfer policy could only be exercised when no law on the subject remains.

- D. Not correct, no malafide (or) whatever the case may be, exists and apart from the aforesaid facts and law of the case.

It is, therefore, most humbly requested that the appeal of appellant being without merit, substance and law be dismissed with costs.

Respondent No.5

Through


Saad Ullah Marwat


Arbab Saiful Kamal


Amjad Khan

&


Syed Kamran Ullah
Advocates Peshawar

Dated: 15.09.2023

NOTE:

Appellant has also filed W.P.No. ~~2229~~ 2229-9/2023 before Hon'ble Peshawar High Court, Peshawar on the same subject matter and is pending disposal till date. (Copy as annex "R/2").



Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar
PH No: 091-9330242

Letter dated

R
R
R

OFFICE ORDER

Consequent upon approval of the Competent Authority, the Notification issued by the District Education Officer (Female) Mohmand vide No 3849-56/(Adjustment SST) dated 29.03.2023 is hereby withdrawn from the date of its issuance.


DIRECTOR


Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst: No. 18386-83 / E-6/Nazia Rehman SST Dated Peshawar the 30/3 2023

Copy forwarded for information and necessary action to the -

1. District Education Officer (Female) Mohmand
2. District Accounts Officer Mohmand
3. Principal Headmistress concerned
4. P.A to Addl; Director (Estab:) local Office


Deputy Director (Estab:)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar


29/3/23 notified
Cancelled so
R No 3 sent to Das kor
in date

BEFORE THE PESHAWAR HIGH COURT, PESHAWAR.



W.P. No. 2229-P/2023

Mst. Shabana Mir d/o Mir Zakam Khan Wazir
R/o House No.32, St.No.5, Shaheen Housing Society, Mathra,
District Peshawar
SST (G) BPS-17, GGHS Dab Kor, Mohmand..... Petitioner

Versus

- 1) Chief Secretary, Government of Khyber Pakhtunkhwa Civil Secretariat, Peshawar.
- 2) Secretary Elementary and Secondary Education Department Block-A, Opposite MPAs Hostel, Civil Secretariat, Peshawar.
- 3) Director Elementary and Secondary Education Department, near GHSS No.1, G.T. Road, Peshawar.
- 4) District Education Officer (female) Mohmand
- 5) Mst. Nazia Rehman SST (BPS-16) Qafila Road, Naseer Street, Tehkal Payan-1, Peshawar..... Respondents

WRIT PETITION UNDER ARTICLE 199 OF THE CONSTITUTION OF PAKISTAN, 1973 AS AMENDED UPTO DATE against the impugned Transfer order No.18380-83/ E-6/Nazi Rehman SST dated Peshawar 30.03.2023 whereby notification dated 29.03.2023 was withdrawn in respect of the posting transfer of the petitioner while the previous notification issued vide office Endst.No.3812-17 dated 22.03.2023 regarding adjustment of fresh appointed

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Regarding Pri

OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) MOHMAND TRIBAL DISTRICT

Phone No. 0924290302

Email: deomohmandfemale@gmail.com

order dated 18/8/23



R.

No 4394 Dated 28/08/2023

To

The Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Subject: PERSONAL HEARING OF DEPARTMENTAL APPEAL OF MST. SHABANA MIR SST (G) GGHS DAB KOR DISTRICT MOHMAND

Reference your letter No.23652 Dated 29-08-2023 on the subject cited above it submitted for your kind information that order No. 18380-83 Dated 30-03-2023 has not been obeyed by the Principal/Incharge of GGHS Dab kor District Mohmand. She has not relieved Mst. Shabana Mir SST and not given the Charge to Mst. Nazia Rehman SST.

District Education Officer (F)
Mohmand Tribal District

official letter, issued
to the principal in charge
not obeying

SST was intact, hence files the instant writ petition before this Hon'ble Court.

PRAYER:

On acceptance of this writ petition it is therefore, earnestly prayed from this Hon'ble Court to:

- i) Issue directions to the official respondents to decide the departmental appeal dated 31.03.2023 forthwith to enable the petitioner to approach the Hon'ble Service Tribunal against the final order.
- ii) Direct the official respondents to make necessary amendments in section-4 Services Tribunal Act wherein statutory period of 90 days may kindly be bring in line with 15 days as stipulated in the posting and transfer policy of the provincial government viz-a-viz transfer cases which cause great inconvenience to the civil servants to avail speedy remedy without waiting for a period of 90 days to be elapsed from the date of departmental appeal.
- iii) To entertain the instant writ petition in the intervening period of 90 days as Civil Servant can only challenge final order in Service Tribunal while there is no final order in this writ petition passed by Departmental Authority on Departmental Appeal preferred by the petitioner, therefore, the writ petition can be entertained in the light of

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reported judgments 2004 PLC (CS) 1363, PLD 1981 (SC) 612 and PLD 2013 (SC) 195 Anita Turab case.

- iv) To suspend the **impugned original order dated 30.03.2023** and to restore the **corrigendum order dated 29.03.2023** issued by respondent No.3 for posting of the petitioner at **GGHS Dab Kor Mohmand**, which is a nearest school to the residence of her parents in terms of **clause-x of the Posting and Transfer Policy** promulgated by the Provincial Government.
- v) Restrain the official respondents from taking any adverse action against the petitioner till final disposal of instant writ petition.

Respectfully Sheweth;

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

- 1) That the petitioner SST (G) (BPS-17) was regularly performing her duties at GGHS Dab Kor Mohmand to the entire satisfaction of her immediate seniors and no complaint whatsoever was filed against her from any quarter.
- 2) That vide order dated 22.03.2023 the DEO (F) Mohmand Tribal District transferred Nazia Rehman SST (G) (BPS-16) from GGHS Dab Kor Mohmand to GGHS Elam Kor Mohmand in best public interest with immediate effect.

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It is pertinent to mention that Nazia Rehman SST (BPS-16) General was working against the wrong post of SST (Bio/ Chemistry), therefore, she was transferred from GGHS Dab Kor Mohmand to GGHS Elam Kor, Pandyali Mohmand against the vacant post of SST General in the best public interest, however, the ibid order was illegally withdrawn by the Director Elementary and Secondary Education Khyber Pakhtunkhwa on her political influence, which is violative of Posting and Transfer Policy formulated by the Provincial Government.

(Copy of order dated 22.03.2023 is Annex: "A")

- 3) That due to political influence exerted by Mst.Nazia Rehman SST (G) BPS-16, the order dated 22.03.2023 was withdrawn/ cancelled as referred in para No.2 above through impugned order dated 30.03.2023, while the petitioner was illegally transferred as SST (G) BPS-17 from GGHS Dab Kor to GGHS Elam Kor Pandyali Mohmand vide order dated 27.03.2023 Ensdt No.3845-41.

(Copy of impugned order dated 30.03.2023 is Annex: "B" while order dated 27.03.2023 is Annex: "C").

- 4) That feeling aggrieved from illegal order dated 27.03.2023 Endst: No.3845-41, the petitioner approached the office of DEO (F) who was kind enough to redress the genuine grievance of the petitioner being (un-married teacher) by withdrawing the ibid order and restoring the posting of the petitioner at GGHS Dab Kor Mohmand while the original order Endst No.3812-17 dated 22.03.2023 regarding posting/ transfer order was restored and kept intact vide corrigendum order dated 29.03.2023.

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It is pertinent to mention that the District Education Officer (F) Mohmand Tribal District i.e. respondent No.3 vide order dated 29.03.2023 Endst. No.3849-56 withdrawn/ cancelled the notification Endst.No.3835-41 dated 27.03.2023.

(Copy of corrigendum order dated 29.03.2023 is Annex: "D" and copy of order dated 29.03.2023 issued by respondent No.3 is Annex: "D/1").

- 5) That the Hon'ble Director Elementary and Secondary Education KP, Peshawar without assigning any reason or cause and without hearing the petitioner withdrawn/ cancelled the order dated 29.03.2023 due to which the petitioner was again illegally transferred and posted as SST (G) from GGHS Dab Kor Mohmand to GGHS Elem Pandiyali Kor Mohmand without taking into consideration the fact that an un-married female teacher shall be posted at the nearest station to her parents house.

It is pertinent to mention that GGHS Dab Kor Mohmand situated near the parents' house of the undersigned while the school i.e. GGHS Elem Kor situated at a distance of 3 to 4 hours traveling from the residence of petitioner, which is against the rules and policy of Government of Khyber Pakhtunkhwa. Copy of impugned order dated 30.03.2023 is already annexed as Annexure "B".

- 6) That the petitioner feeling aggrieved and dissatisfied from the impugned order dated 30.03.2023, preferred Departmental Appeal dated 31.03.2023 to the respondent No.2, which was fixed for personal hearing on 12.04.2023 at 11:00 am in the office Additional Secretary Elementary and Secondary Education Department, but the same was

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postponed and till date no further hearing has been fixed in the matter in hand.

(Copies of departmental appeal dated 31.03.2023 is Annexure "E" and letter of personal hearing dated 07.04.2023 is Annex: "F").

- 7) That earlier the petitioner approached the Hon'ble Provincial Service Tribunal KP, Peshawar against the original impugned order dated 30.03.2023 but the same was returned on the ground that the period of 90 days has not been elapsed, therefore, the appeal is premature, hence having no other alternate remedy in the intervening period of 90 days, the petitioner constrained to approach this Hon'ble Court for redressal of her grievance on the following amongst other grounds.

(Copy of grounds of appeal along with order dated 17.05.2023 are attached as Annexure "G and H")

GROUNDS:

- a) That the impugned transfer/ posting notification dated 30.03.2023 is violative of **clause-x** of the Posting & Transfer Policy promulgated by the Provincial Government wherein it has been categorically mentioned that **unmarried female government servants** may be facilitated to be posted at the station of the residence of their parents.

It is necessary to reproduce clause-x in verbatim for the convenience of this Hon'ble Court.

Clause (x). All the posting/ transferring authorities may facilitate the posting/ transfer of the unmarried female government servants at the station of the residence of their parents.

- b) That it is pertinent to mention that Nazia Rehman SST (BPS-16) General was working against the wrong post of SST (Bio/ Chemistry), therefore, she was transferred from

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GGHS Dab Kor Mohmand to GGHS Elam Kor, Pandwali Mohmand against the vacant post of SST General in the best public interest, however, the ibid order was illegally withdrawn by the Director Elementary and Secondary Education Khyber Pakhtunkhwa on her political influence, which is violative of clause-ii of the Posting and Transfer Policy formulated by the Provincial Government.

It is necessary to reproduce clause-ii in verbatim for the convenience of this Hon'ble Court;

Clause (ii). All government servants are prohibited to exert political, Administrative or any other pressures upon the posting/ transfer authorities for seeking posting/ transfers of their choice and against the public interest.

- c) That this Hon'ble Court has time and again declared illegal those posting and transfer orders passed by the authorities, which are violative of the Posting and Transfer Policy promulgated by the Provincial Government which need to be complied in its strictest sense.
- d) That from bare perusal of the available record regarding the illegal transfer of the petitioner speaks volume of malafide and indicative of **high handedness, favoritism and misuse of authority, therefore, violative of the most celebrated judgment rendered by the Supreme Court of Pakistan in Anita Turab's case reported in PLD 2013 SC 195.**
- e) That additional ground will be raised at the time of arguments with the kind permission of this Hon'ble Court at the time of hearing.

Keep in view what has been stated above, it is therefore, earnestly prayed from this Hon'ble Court to:

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- i) Issue directions to the official respondents to decide the departmental appeal dated 31.03.2023 forthwith to enable the petitioner to approach the Hon'ble Service Tribunal against the final order.
- ii) Direct the official respondents to make necessary amendments in section-4 Services Tribunal Act wherein statutory period of 90 days may kindly be bring in line with 15 days as stipulated in the posting and transfer policy of the provincial government viz-a-viz transfer cases which cause great inconvenience to the civil servants to avail speedy remedy without waiting for a period of 90 days to be elapsed from the date of departmental appeal.
- iii) To entertain the instant writ petition in the intervening period of 90 days as Civil Servant can only challenge final order in Service Tribunal while there is no final order in this writ petition passed by Departmental Authority on Departmental Appeal preferred by the petitioner, therefore, the writ petition can be entertained in the light of reported judgments 2004 PLC (CS) 1363, PLD 1981 (SC) 612 and PLD 2013 (SC) 195 Anita Turab case.
- iv) To suspend the **impugned original order dated 30.03.2023** and to restore the **corrigendum order dated 29.03.2023** issued by respondent No.3

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for posting of the petitioner at **GGHS Dab Kor Mohmand**, which is a nearest school to the residence of her parents in terms of **clause-x of the Posting and Transfer Policy** promulgated by the Provincial Government.

- v) Restrain the official respondents from taking any adverse action against the petitioner till final disposal of instant writ petition.

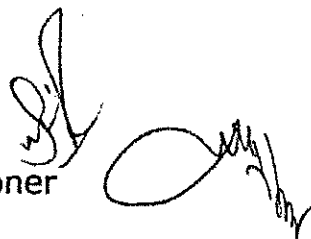
Any other relief, to whom the petitioner found entitle, may also be granted.

INTERIM RELIEF:

By way of interim relief, operation of impugned order dated 30.03.2023 may kindly be suspended and no adverse action shall be taken action against the petitioner during pendency of the writ petition.

Dated: 25.05.2023

Petitioner
Through


Inayat Ullah Khan
Advocate
Supreme Court of Pakistan
LL. M (U.K)

CERTIFICATE:

Certified as per information furnished by my client that no such like writ petition has earlier been filed before this hon'ble court by the petitioner.

LIST OF BOOKS:

- 1) Constitution of Islamic Republic of Pakistan, 1973
- 2) Law books as per need.


Advocate

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BEFORE THE PESHAWAR HIGH COURT, PESHAWAR.

W.P.No. _____/2023

Mst.Shabana Mir..... Petitioner

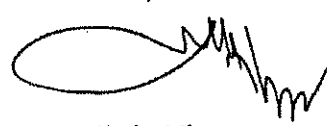
Versus

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

AFFIDAVIT

I, **Mst.Shabana Mir** d/o Mir Zakam Khan Wazir R/o House No.32, St.No.5, Shaheen Housing Society, Mathra, District Peshawar SST (G) BPS-17, GGHS Dab Kor, Mohmand do hereby affirm and declare on oath that the contents of the accompanying **writ petition** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

Identified by:



Inayat Ullah Khan
Advocate Supreme Court
LL.M (U.K)

Deponent

CNIC No.17301-1399983-8

Cell: 0333-3323479



39276

Certified that the above was verified on solemn affirmation before me on this 26 day of May 2023 at Peshawar s/o Mst. Shabana Mir who was identified by Inayat Ullah Khan who is personally known to me.

Oath Commissioner
Peshawar High Court, Peshawar
26/5/2023

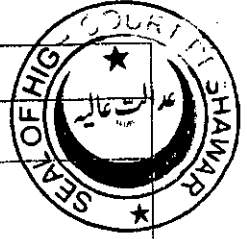
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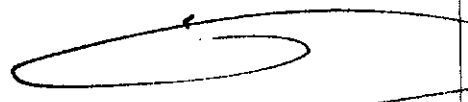
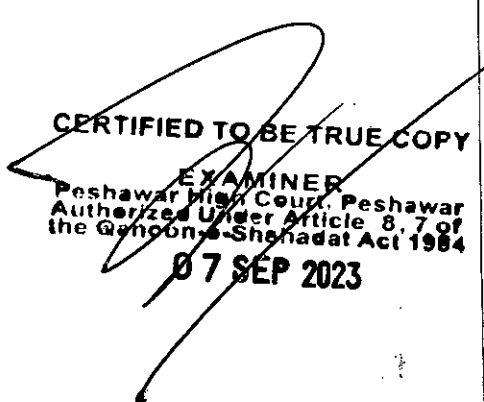
EXAMINER
Peshawar High Court, Peshawar
Authorized Under Article 8, 7 of
the Qanun-e-Shahadat Act 1984
07 SEP 2023

PESHAWAR HIGH COURT, PESHAWAR

ORDER SHEET

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Date of Order of Proceedings	Order or other Proceedings with Signature of Judge(s).
1	2
07.06.2023	<p><u>W.P. No.2229-P/2023</u></p> <p>Present: Mr. Inayat Ullah Khan, Advocate, for the petitioner.</p> <p>*****</p> <p>Since the petitioner has called in question vires of Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, as such, notice be issued to the worthy Advocate General, Khyber Pakhtunkhwa in terms of Order-XXVIA of the Civil Procedure Code, 1908 for a date to be fixed by office.</p> <p> JUDGE</p> <p> JUDGE</p> <p> CERTIFIED TO BE TRUE COPY EXAMINER Peshawar High Court, Peshawar Authorized Under Article 8, 7 of the Qanoon-e-Shahadat Act 1984 07 SEP 2023</p>

(Muhammadullah)*

(DB) Hon'ble Mr. Justice Ijaz Anwar and Hon'ble Mr. Justice Syed Muhammad Attique Shah

PESHAWAR HIGH COURT PESHAWAR
ORDER SHEET





Date of Order or Proceedings	Order or other Proceedings with Signature of Judge or that of parties or counsel where necessary
1	2
25.07.2023	<p><u>W.P 2229-P/2023 With IR</u></p> <p>Present: Nemo.</p> <p>*****</p> <p>In view of the adjournment application moved by counsel for the petitioner on the grounds mentioned therein, the case is adjourned to a date in office.</p> <p style="text-align: center;">~ JUDGE</p> <p style="text-align: center;">32 JUDGE</p> <p style="text-align: right;">CERTIFIED TO BE TRUE COPY EXAMINER Peshawar High Court, Peshawar Authorized Under Article 8, 7 of the Governance-Shahadat Act 1964 07 SEP 2023</p>

PESHAWAR HIGH COURT, PESHAWAR

ORDER SHEET



Date of Order of Proceedings	Order or other Proceedings with Signature of Judge(s).
1	2
06.09.2023	<p><u>W.P. No.2229-P/2023 with IR</u></p> <p>Present: Clerk of learned counsel for the petitioner.</p> <p>Mr. Amir Javed, Advocate General, for the official respondents.</p> <p>*****</p> <p>The former requested for adjournment on the ground of illness of learned counsel for the petitioner.</p> <p>Adjourned to a date in office.</p> <p style="text-align: right;"> JUDGE</p> <p style="text-align: right;"> JUDGE</p> <p style="text-align: right;">CERTIFIED TO BE TRUE COPY</p> <p style="text-align: right;">EXAMINER Peshawar High Court Peshawar Authorized Under Article 8, 7 of the Qanun-e-Shahadat Act 1984 07 SEP 2023</p> <p style="text-align: center;">7712 07-09-2023 13- 52-10 07-09-2023 07-09-2023 07/16</p>

(Muhammadullah)

(DB) Hon'ble Mr. Justice Ijaz Anwar and Hon'ble Mr. Justice Shakeel Ahmad

بعدالت

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KP Service Tribunal

2 منجانب

بنام

BC-22-15-16
0310-8846100

مورخہ

مقدمہ

دعویٰ

جرم

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ

آن مقام پیش اور کیلئے بعد اللہ سرور اہل

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 ق تقرر ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا محتاج ہوگا۔ از بصورت ضرورت مقدمہ مذکور 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 بھی وہی جملہ مذکور با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ ہوں گے سب سے وہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

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ماہ

المرقوم: 25/09/2023

العبد
ابوابہ سنہ ۱۴۴۵ھ
20