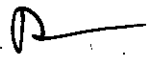


7.

23.04.2015

Counsel for the appellant present. The learned counsel for the appellant seeks adjournment. Adjourned for preliminary hearing to 15.05.2015 before S.B.

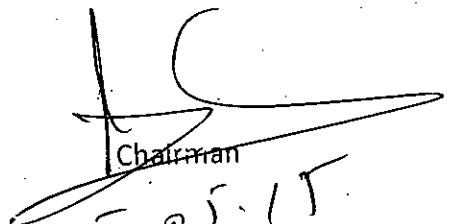

Member

8

15.05.2015

None present for appellant despite repeated calls. The Court time is about to over. Dismissed for want of prosecution. File be consigned to the record.

ANNOUNCED
15.5.2015


Chairman
15.05.15

3.

Reader Note:

17.11.2014

Clerk of counsel for the appellant present. Since the Tribunal is incomplete, therefore, case is adjourned to 21.01.2015 for the same.


Clerk

4.

21.01.2015

No one is present on behalf of the appellant. Notices be issued to the appellant/counsel for the appellant. To come up for preliminary hearing on 02.02.2015.


Member

5.

02.02.2015

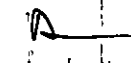
No one is present on behalf of the appellant. Fresh notices be issued to the appellant/counsel for the appellant. To come up for preliminary hearing on 06.03.2015.


Member

6.

06.03.2015

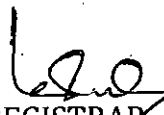

Counsel for the appellant present and requested for adjournment. Request accepted. To come up for *preliminary hearing* on 23.04.2015.


Member

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 1293/2014

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	31/10/2014	<p>The appeal of Mst. Hameeda bibi resubmitted today by Mr. Haleem Khan Bangash Advocate may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p>
2	31-10-2014	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>17-11-2014</u></p> <p style="text-align: right;"> CHAIRMAN</p>

1

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



1246

Service Appeal No of 2014

Civil Miscellaneous No of 2014

Haji Abdul Aziz KhanPetitioner

Versus

Government of K.P.K etc.....Respondents

SERVICE APPEAL

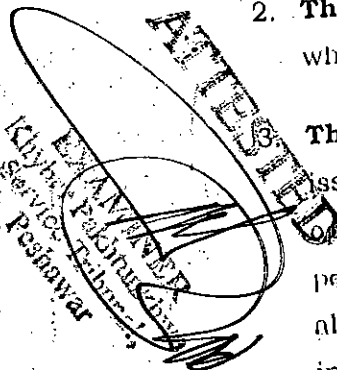
**AN URGENT APPLICATION FOR INTERIM RELIEF IN THE SHAPE SUSPENDING
THE OPERATION OF IMPUGNED TRANSFER ORDER/NOTIFICATION DATED
15.10.2014**

Respectfully Sheweth,

1. That the contents of main Petition may please be read as part of this application.
2. That the Petitioner has raised strong points of law in the main Petition, which shall require thorough probe and adjudication.

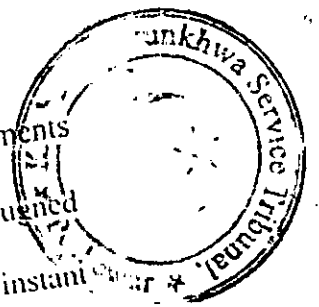
That presently, an impuned Order/Notification Dated 15.10.2014 has been issued which will take effect to the detriment of the Petitioner and if the operation of the same is not suspended till the final disposal of instant writ petition on merits, the Petitioner would suffer irreparable loss and it will also affect the merits of the case rather the instant petition will become infructuous.

4. That refusal of interim relief might generate numerous complications as well as shall expose the Petitioner to colossal losses and the very purpose of



Handwritten signature
7-10-2014

Appeal No. 1246/2014



20.10.2014

Counsel for the appellant present. Preliminary arguments partly heard and case file perused. Appellant has impugned transfer order dated 15.10.2014 against which he filed the instant appeal on 17.10.2014. After institution of the instant appeal the office of this Honorable Service Tribunal raised a legal objection on the maintainability of service appeal as the instant appeal is not competent without filing departmental appeal which was returned to the counsel for the appeal for completion and resubmission within 15 days. The learned counsel for the appellant submitted reply to office objection on 17.10.2014 wherein he relied on PLJ 2014 Tr.C.(Services) 41 and 2012 PLC (C.S.) 648. Counsel for the appellant also filed an application for interim relief.

The matter required further clarification, therefore, pre-admission notice be issued to the AAG/GP to assist the tribunal on the point of maintainability To come up for preliminary hearing on 07.11.2014. Till then status-quo be maintained

sd/-
Members

Certified to be a true copy
Khyber Pakhtunkhwa Service Tribunal

Date
Number
Copies
Urdu
Total
Name
Date
Date


30-10-2014
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30-10-2014
30-10-2014

This is an appeal filed by Mst. Hameeda Bibi today on 23/10/2014 against the order dated 26.7.2014 and 29.8.2014 against which she preferred/made a departmental appeal on 15.09.2014 the period of ninety days is not yet lapsed as per section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, which is premature as laid down in an authority reported as 2005-SCMR-890.

As such the instant appeal is returned in original to the appellant/counsel. The appellant would be at liberty to resubmit fresh appeal after maturity of cause of action.

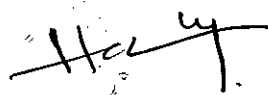
No. 1521/ST,

Dt. 24.10/2014


REGISTRAR
(SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Nuti-ur-Rehman Adv. Pesh.

Sir, I have filed the departmental appeal against the order dt. 26.7.2014 AND 29.8.2014 before the Director education whom has pleased to pass the order on 24.9.14 which is final order of the concerned authority. So the appeal is very much in time so kindly entertained the appeal.


27.10.14
Halim Khan Bangash
Advocate High Court

P.T.O

Sir,

one Appeal bearing No 1246/2014.
Titled. Haji Abdul AZIZ v/s CA w etc
is pending in this Honble Tribunal.
in which status quo granted and
the transfer order^{17.10.14} which is
pleased to suspend on 20.10.14.
and in this Appeal reliance was placed
on PLJ 2014, Tr-Cas (Service) Page 41
& 2012 PLC (C.S) Page 648.

So my appeal is also of the same
nature so to this extent kindly
fulertain my Appeal.

~~Hc w~~ 30.10.14.
HAJIM BANGAS 71.

Be registered.

31/10/14

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

Service Appeal No. 1293 of 2014

Mst: Hameeda Bibi PST, Appellant.

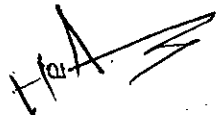
VERSUS

Director School & Literacy KPK, Peshawar & others
..... Respondents


INDEX

S.No.	Description of documents	Annexure	Pages
1.	Memo of Appeal with affidavit		1-6
2.	Application for suspension of impugned orders with affidavit		7-9
3.	Addresses of the parties		10
4.	Copy of appointment order	"A"	11-15
5.	Copy of transfer order dated 26/07/2014	"B"	16-17
6.	Copy of order dated 29/08/2014	"C"	18-20.
7.	Copy of order dated 24/09/2014	"D"	21-23.
8.	Wakalat Nama		In original

Dated 22/10/2014


Appellant
Through

Muti ur Rehman


Halim Khan Bangash,
Advocates, High Court,
Peshawar.

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

Service Appeal No. 1293 of 2014

Mst: Hameeda Bibi PST, Govt Girls Primary School,
Aryan District Chitral.

..... Appellant.

VERSUS

1312
23-10-2014

- 1- Director School & Literacy KPK, Peshawar.
- 2- Govt of KPK through Secretary Education
Department, Civil Secretariat, Peshawar.
- 3- DEO (Female) District Chitral.
- 4- Mst: Zar Begum PST Govt Girls Primary School
Aryan District Chitral.

..... Respondents

**APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL ACT 1974, AGAINST THE
ORDER DATED 26/07/2014 AND 29/08/2014
PASSED BY THE RESPONDENT NO.1 WHEREBY
APPELLANT WAS TRANSFER VICE
RESPONDENT NO.4 WHO IN TURN WAS
TRANSFERRED VICE THE APPELLANT.**

Prayer in Appeal:

On acceptance of this appeal the impugned orders dated 26/07/2014 and 29/08/2014, may kindly be declared to be illegal, malafide, result of undue political pressure, void, violative of rules and policy governing the subject without lawful authority and be accordingly cancelled.

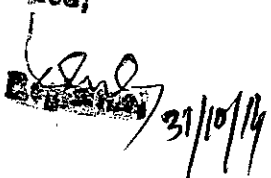
Respectfully Sheweth:

- 1- That the appellant is serving in Education Deptt: Since her appointment. (Copy of order attached as Annexure "A").



23/10/14

re-submitted to cap
and filed;


31/10/14

- 2- *That during the service appellant was posted in Govt Girls Primary School Aryan District Chitral.*
- 3- *That the husband of appellant is also serving Education Department in teaching cadre and perform his duty as professor in Govt Degree College Chitral.*
- 4- *That the appellant performing her duty smoothly in Govt Girls Primary School Aryan (Chitral) while suddenly respondent No.3 transferred her services from GGPS Aran to GGPS Zond, Rangram vide order dated 26/07/2014 without assigning any charge. (Copy of order is attached as Annexure "B").*
- 5- *That being aggrieved from the said order the appellant then filed review petition/before respondent No.3 for reversing / cancelling the said order of 26/07/2014, whereby the appellant review petition was, however, accepted to the extent, but no order was made for re-posting of the appellant to her old place i.e. GGPS Aryan Chitral. (Copy of order dated 29/08/2014 attached as Annexure "C").*
- 6- *That the appellant then prefer representation / departmental appeal before respondent No.1 but could not accorded vide order dated 14/09/2014, hence this appeal. (Copy of appeal attached as Annexure "D").*
- 7- *That respondent No.1 then issued an ambiguous order bearing No.6937, F-No.28(F) appeal Dir, dated*

24/09/2014 but no any appropriate order passed in this respect the appellant being aggrieved from ^{this} order, therefore knocking a the door of this Hon'ble Tribunal.

- 8- That subject to the notification / policy of the Education Deptt., that the spouses will be posted at the same station, but the appellant was picked and posted from Chitral City to Tehsil MorKu, which is far-flung area of Upper Chitral approximately at the distance of 200 Km from Chitral.
- 9- That the transfer order is not only against the spouses policy but also manifestly discrimination on the part of respondent / department, hence hit at the core of Article 25 of the Constitution of Islamic Republic of Pakistan, 1973, thus both the orders needs to be reversed / cancelled accordingly.
- 10-That the appellant is already suffering from peptic ulcer (Stomach Disease) and traveling to far-flung hilly area is much detriment and inconvenient / difficult, hence needs the appellant to be reposted to her initial / old station i.e. GGPS Aryan Chitral City.
- 11-That the transfer of the appellant is clear cut violation of transfer / posting and appointment Rules and spouses policy has been virtually brought to zero magnitude.

12-That the same being illegal, malafide, result of undue political pressure, void violative of Rules and policy Governing the subject, without lawful authority appellant is obliged to assail the same before this Hon'ble Tribunal inter-alia on the following:

GROUND:

- A) That the impugned order is highly illegal void and without lawful authority.
- B) That the impugned order has not been passed in the interest of public servant as is appeared from the fact narrated herein before. It has been passed to please an individual.
- C) That the impugned order is also violative of the law, policy governing the subject wherein it has been provided that an incumbent should be allowed to perform her duty smoothly at her husband station.
- D) That the impugned order is against the spirit of law laid down by the august Supreme Court of Pakistan, besides being highly malafide and result of political maneuvering.
- E) That respondent No.1 has not applied her independent mind while passing the impugned order. She has followed the illegal and unwarranted dictates of the else.

F) That the impugned order is highly arbitrary unjust and oppressive.

It is, therefore, respectfully prayed that on acceptance of this appeal, the impugned orders dated 26/07/2014 and 29/08/2014 may please be set aside and appellant be allowed to continue her services at initial station, from where she has been transferred.

Dated 22/10/2014

*Appellant
Through*

Muti ur Rehman

*Halim Khan Bangash
Advocates, High Court,
Peshawar.*

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

Service Appeal No. _____ of 2014

Mst: Hameeda Bibi PST, Appellant.

VERSUS

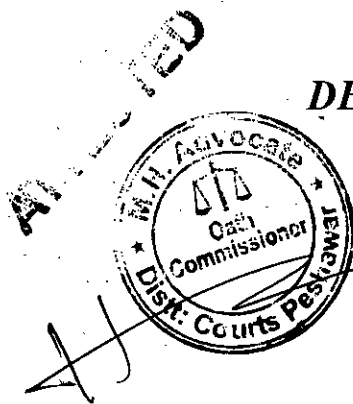
Director School & Literacy KPK, Peshawar & others
..... Respondents

Affidavit

I, Mst: Hameeda Bibi PST, Govt Girls Primary School, Aryan District Chitral do hereby solemnly affirm and declare on oath that the contents of the accompanying appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

H.A. 3

DEPONENT



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

Service Appeal No. _____ of 2014

Mst: Hameeda Bibi PST, Appellant.

VERSUS

Director School & Literacy KPK, Peshawar & others
..... Respondents

**APPLICATION FOR SUSPENDING THE
OPERATION OF THE IMPUGNED
TRANSFER ORDERS DATED 26/07/2014
AND 29/08/2014 TILL THE FINAL DISPOSAL
OF THE APPEAL.**


Respectfully Sheweth:

- 1- That the petitioner / appellant is filing the accompanied appeal in this Hon'ble Tribunal in which date is to be fixed in due Course.
- 2- That the petitioner / appellant has got a good prima facie case and is sanguine about the success of her appeal.
- 3- That the impugned transfer order has passed due to political pressure, malafide and thus not a legal order the balance of convenience is in favour of the petitioner.
- 4- That in case the impugned order is not suspended, which is illegal and void the petitioner /appellant would suffer an irreparable loss.

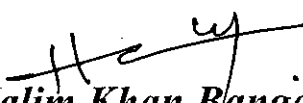
5- That the ground taken in the accompanying appeal may graciously be read as a part and parcel of this application.

It is, therefore, respectfully prayed that the operation of the impugned transfer order dated 26/07/2014 and 29/08/2014 may please be suspended till the final disposal of the appeal.

Dated 22/10/2014


Appellant
Through

Muti ur Rehman


Halim Khan Bangash
Advocates, High Court,
Peshawar.

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

Service Appeal No. _____ of 2014

Mst: Hameeda Bibi PST, Appellant.

VERSUS

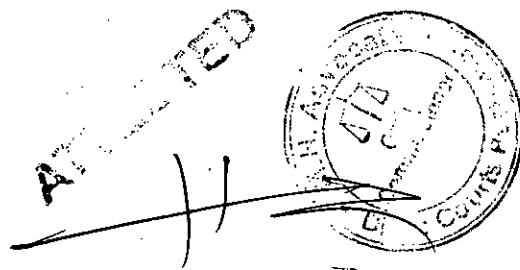
*Director School & Literacy KPK, Peshawar & others
..... Respondents*

Affidavit

*I, Mst: Hameeda Bibi PST, Govt Girls Primary
School, Aryan District Chitral do hereby solemnly
affirm and declare on oath that he contents of the
accompanying appeal are true and correct to the best
of my knowledge and belief and nothing has been
concealed from this Hon'ble Court.*



DEPONENT


The stamp is circular and contains the text "KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR" around the perimeter. In the center, there is a date stamp "17/11/2014" and the word "ACCEPTED" written diagonally across it.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR.

Service Appeal No. _____ of 2014

Mst: Hameeda Bibi PST, Appellant.

VERSUS

Director School & Literacy KPK, Peshawar & others
..... Respondents

ADDRESSES OF THE PARTIES

Appellant

*Mst: Hameeda Bibi PST, Govt Girls Primary
School, Aryan District Chitral.*

Respondents

- 1- Director School & Literacy KPK, Peshawar.*
- 2- Govt of KPK through Secretary Education
Department, Civil Secretariat, Peshawar.*
- 3- DEO (Female) District Chitral.*
- 4- Mst: Zar Begum PST Govt Girls Primary School
Aryan District Chitral.*

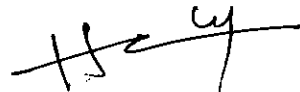
Dated 22/10/2014



Appellant
Through



Muti ur Rehman



***Halim Khan Bangash
Advocates, High Court,
Peshawar.***

P-30-15




ANN
A

(11)

SERVICE CERTIFICATE.

Certified that Mr/Mrs Hammida Bto S/D/O
Saeedullah is serving in Education Department as
post at PSI, GSPS Arjan Chitral since 15-7-1997

He/She is still in service.


PRINCIPAL
G.C.M.S BOYS
CHITRAL


Deputy Dist. Officer (F)
CHITRAL

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PRIMARY CHITRAL.

NOTIFICATION.

consequent upon their selection by the departmental selection Committee, the District Education Officer (Female) Pricy Chitral has been please to Appoint the following trained PTC candidates at Schools noted against their names in BPS-V (Rupees 1480-81-2695 plus usual allowances as admissible under rules with immediate effect subject to the existing terms and conditions:-

S.No.	Name/father name quali./Address.	D/O Birth	Merit No.	Schools where posted.	Remarks.
1.	Bibi Habiba FA PTC-D/O Akar Ali Khan R/O Booni Chitral.	01-12-75	1	GGPS Madak.	App'tt against vacant PTC post.
2.	Shamim Akhtar FA PTC D/O Salahud Din R/O Booni Chitral.	02-01-78	2	GGPS Melp Muzhgrame.	App'tt against newly created PTC post.
3.	Fatima Jahan FA PTC D/O Aziz Wali Shah R/O Barenis Chitral.	01-02-76	3	GGPS Preit.	App'tt against vacant PTC post.
4.	Hafiza Bibi Mat. PTC D/O Amir Murad R/O Warjune Chitral.	01-03-78	4	GGPS Nograime.	--do--
5.	Bibi Maryam Mat. PTC D/O Wali Rofmat Chitral.	12-06-76	5	GGPS Golain.	--do--
6.	Shazia Assamud Din Mat. PTC D/O Assamud Din R/O Ayun Chitral.	02-03-78	6	GGPS Ashirate.	--do--
7.	Safia Kousar Mat. PTC D/O Baz Muhammad R/O Shahrigan Chitral.	02-02-78 01-02-69	7	GGPS Sheralish Ashirate.	--do--
8.	Gul Nar Mat. PTC D/O Rahim Khan R/O Mander Chitral.	12-02-78	8	GGPS Gaht Sale	Against newly created PTC post.
9.	Mahsina FA PTC D/O Sajad Hussain R/O Werkup Chitral.	05-01-71	9	GGPS Shagrame.	Against vacant PTC post.
10.	Tamiza FA PTC D/O Chulam Jaffar R/O Kosht Chitral.	01-06-78	10	GGPS Sialomi Terich.	--do--
11.	Farveen Bibi FA PTC D/O Abdur Rehman R/O Booni Chitral.	25-12-70	11	GGPS Muzhgram Melp.	Against newly created PTC post.
12.	Hamida Bibi FA PTC D/O Saeedullah R/O Werkup Chitral.	02-04-78	12	GGPS Lonkoh.	Against vacant PTC post.
13.	Khubar Nisa Mat. PTC D/O Khan R/O Lone Chitral.	15-01-78	13	GGPS Golain.	--do--
14.	Hassina Banat Mat. PTC D/O Haq Nawaz R/O Koghuzi Chitral.	09-04-77	14	GGPS Koghuzi.	App'tt newly created PTC post.

(contd)

[Handwritten signature]
S.C. [unclear]
CHITRAL P.O.

[Handwritten signature]
A.K. [unclear]

1515	Nelufar Banazir Mat: PTC D/O Mirza Ali Khna R/O Psoni	11-09-75	15	GGPS Saht.	Against Vacant PTC post.
1610	Farman Jamal Mat: PTC D/O Barkamal Baig R/O Murder Chitral	13-03-78	16	GGPS Parabeg Gaht Bala.	-do-
1718	Nuhria Bibi Mat: PTC D/O Sher Nawaz Khan R/O Kosht	25-02-78	17	GGPS Ursoon.	-do-
1810	Shahria Banu FA PTC D/O Gul Nawaz Khan R/O Kosht Chitral	02-08-76	1	(AIUO) GGPS Ursoon.	-do-
1917	Bibi Jahan Ara FA PTC D/O Izatullah Khan R/O Chitral	19-04-78	2	GGPS Rabat Parabeg <i>Rabat</i>	-do-
2020	Janan Bibi Mat: PTC D/O Akbar Taj R/O Arkari Chitral	02-02-77	6	<i>do</i> <i>Arilchi</i>	-do-
2122	Nabila Parveen FA PTC D/O Umer Bakhsh R/O Drosh Chitral	27-09-76	3	GGPS Biori	-do-
2222	Bibi Sakina Mat: PTC D/O Gul Muhammad Khan R/O Chitral	10-02-78	4	GGPS Asper Domil.	-do-
2328	Ume Habiba Mat: PTC D/O Sher Khan R/O Warijune Chitral	16-06-77	5	GGPS Swato Domil.	-do-
2425	Bibi Kamila Mat: PTC D/O Shah Iqbal Khan R/O Warijune	05-03-71	7	GGPS Swato Domil.	-do-
2525	Bibi Arbra Mat: PTC D/O Muhammad Nazir R/O Warkup Chitral	17-02-78	8	GGPS Asper Domil.	-do-


TERMS AND CONDITIONS.

1. They will be governed by such rules and regulations as may be prescribed by the Govt. from time to time for the category of Govt. servants to which they belong.
2. Their services will be liable to termination on one month notice from either side. In case of resignation without notice one month pay will be forfeited in lieu thereof.
3. They should join the posts within one month of the issue of this notification.
4. Their seniority will be determined in accordance with the merit of departmental selection Committee.
5. Charge report should be submitted to all concerned.
6. They shall be on probation for a period of two years and will have to pass departmental examination. In case a candidate fails to qualify the departmental examination he will be given one more chance. If she fails again then his services will be terminated. On arrival of trained candidate their services will be terminated.
7. Their original certificates should be checked and verified from the concerned University, BISE.
8. Services Books of the Teachers must be prepared complete in all respect before handing over charge.
9. The declaration of assets should be obtained from them immediately and placed on record.

[Signature]
 PRINCIPAL
 G.C.M. BOYS
 CHITRAL

Contd. page... 3

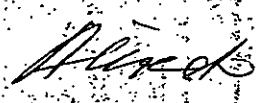
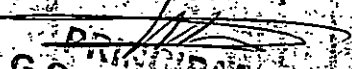
- 10. They are required to produce health and age Certificate from the Medical authority concerned before taking over charge.
- 11. Charges should not be given to over age candidate. Max case for age relaxation be sent to concerned quarter.
- 12. Efforts for transfer before completion of tenure will disqualify from the service.
- 13. No TA DA is allowed.
- 14. And undertaking shall be obtained from Master and degree holder PTC etc that they will service the Department are atleast Five years.
- 15. In case of person appointed as an untrained teacher, she will have to pass the requisite training exam within a period of 4 years failing which her services will be terminated.


 (NASIM AKHTAR)
 District Education Officer
 (Female) Primary Chitral.

Endst: No. 429-58 /A-5 Dated 26-06-1997.

Copy forwarded for information and N/A to the:-

- 1. The Director of Primary Education NWFP Peshawar.
- 2. P.S. to Secretary to Govt. of NWFP Edu. Deptt. Peshawar.
- 3. District Account Officer Chitral.
- 4. Sub-Divisional Education Officer (f) Chitral.
- 5. Officials concerned.
- 6. Incharge teachers concerned.



 PRINCIPAL
 G.C. M. S. BOYS
 CHITRAL

District Education Officer,
 (Female) Primary Chitral.

412627

AMM B-16

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) E&S EDUCATION CHITRAL
OFFICE ORDER

Transfer of the following PSHT/SPST and PST (Female) teachers in the elementary & Secondary Education Department is here by ordered on their own pay and grade in the best interest of Public Service in the school noted against each with immediate effect:-

S.No	Name of Official	BPS NO	Date of taking over charge in P/School	From	To	Remarks
1	Gulshan Bibi	14	1/8/2011	GGPS Sarghuz	GGPS Awi	VSN. 2
2	Parveen Bibi	14	5/10/2002	GGPS Awi	GGPS Sarghuz	VSN.1
3	Sultanla	12	1/8/2011	GGPS Harchin	GGPS Sonoghure	VSN. 4
4	Zahida Bibi	12	1.8.2007	GGPS Sonoghur	GGPS Harchin	VSN. 3
5	Gulzar Jamal	15	2/10/2011	GGPS Ballm	GGPS Brep	VSN.6
6	Sifat Jamal	12	1.8.2011	GGPS Brep	GGPS Ballm	VSN.5
7	Zainab Jamal	12	31.3.2007	GGPS Dizg	GGPS Brep	VSN.8
8	Bibi Hawala	15	14-10-2010	GGPS Brep	GGPS Dizg	VSN.7
9	Margast Bibi	14	18-8-2006	GGPS Dizg	GGPS Istuch	VSN.10
10	Bibi Hamida	12	14-10-2010	GGPS Istuch	GGPS Brep	VSN.11
11	Rubina	12	21-8-2011	GGPS Brep	GGPS Dizg	VSN.9
12	Habiba	12	9/9/2011	GGPS Madak	GGPS Kuragh	VSN.13
13	Suraya Begum	15	1.8.2007	GGPS Kuragh	GGPS Madak	VSN.12
14	Noor Nisa	14	18.8.2009	GGPS M.Mehip	GGPS Sonoghure	VSN. 15
15	Hamida	12	1-8-2011	GGPS Sonoghur	GGPS M.Mehip	VSN.14
16	Nahida Bibi	12	1/8/2011	GGPS Ballm	GGPS Harchin	VSN.17
17	Masreen Bibi	15	18.8.99	GGPS Harchin	GGPS Ballm	VSN.16
18	Taqleed	14	1/8/2011	GGPS SorLaspur	GGPS Parkusup	VSN.19

ATTACHED
Halim Khan Bangash
Associate
23/10/10

67	Muntakhab Bibi	14	20.12.2007	GGPS M.Mehlp	GGPS Nogram	VSN.68
68	Ume Habiba	14	1.4.2001	GGPS Nogram	GGPS M.Mehlp	VSN.67
69	Saeedun Nisa	14	13.4.2003	GGPS Riri Owlr	GGPS Shahbronze Owlr	Against Dib: Aysha
70	Sakina		15.8.2007	GGPS Sheradesh	GGPS Bang	VSN.71
71	Sahla Gul	14	4.8.2007	GGPS Bang	GGPS SorRech	Against Salra Banu
72	Baghicha	15	1.8.2007	GGPS Waht	GGPS Awl	VSN.73
73	Shahida Bibi	12	2.3.2009	GGPS Awl	GGPS Sor Rech	VSN.47
74	Hamida Sultan	14	1-8-2009	GGPS Aryan	GGPS Z.Gram Terich	Against Zar Begum
75	Shahida Sultan	14	1.4.2014	GGPS Balim	GGPS Kosht Payeen	VSN.76
76	SardarBibi	14	23-8-2010	GGPS Kosht Payeen	GGPS Parwak	VSN.77
77	Janjal	14	7.3.2009	GGPS Parwak	GGPS Balim	VSN.75
78	Shahida Bibi	14	12.4.2010	GGPS Shagram Daghar	GGPS Rayeen	VSN.79
79	Nasreen Bibi	14	25.8.2004	GGPS Rayeen	GGPS Shagram Daghar	VSN.78

Note:

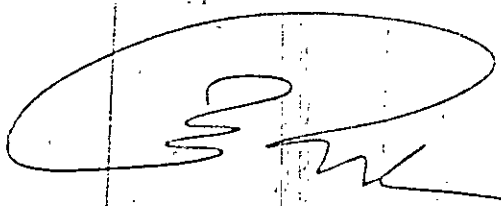
1. TA/DA is not allowed.
2. Charge report should be submitted to all concerned.

(ZEHRA JALAL)
 District Education Officer
 (Female) Chitral

Endst: No. 4393-4450 /EB(F) T-1 Dated Chitral the 26 / 7 /2014

Copy of the above is forwarded for information to the:--

1. District Accounts Officer Chitral
2. In-charge Concerned
3. DEMIS Local Office
4. Officials Concerned
5. Teachers Concerned.



District Education Officer
 (Female) Chitral

Handwritten notes and stamps:
 A. H. ...
 23.10.14

AAAF - C
18

Minutes of the Meeting of Departmental Review Committee of E & SE (F)

Education Department Chitral held on 18 to 23rd August 2014

A meeting of the departmental review committee was held under the chairpersonship of Mrs. Samina Jahan Head Mistress GGHS AYUN on 18th to 23rd August 2014 at DEO (F) Office Chitral to Consider /review the appeals submitted by the teachers against recent general transfer July 2014.

Committee attend the Meeting

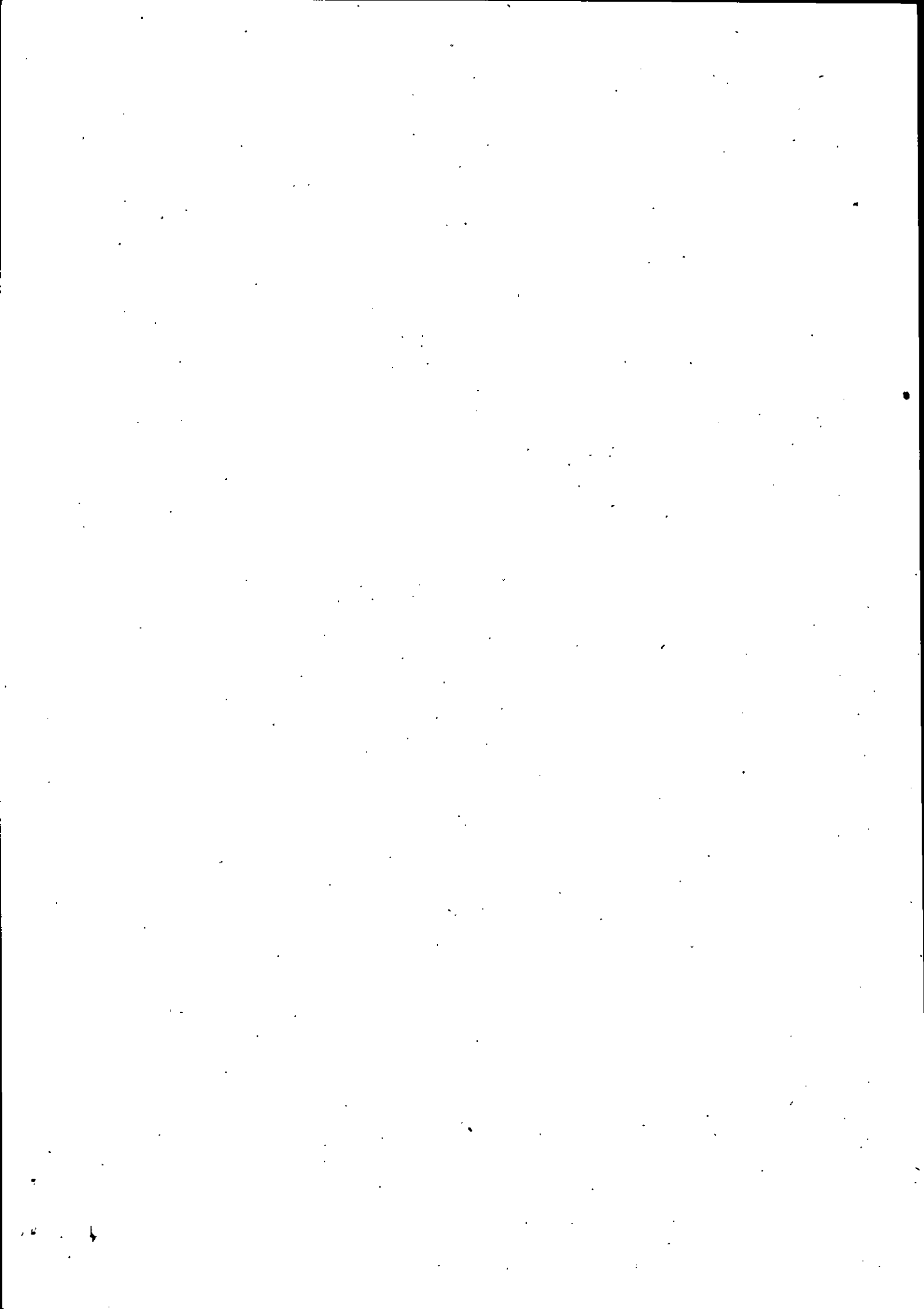
1. Samina Jahan Principal GGHS Ayun (Chairperson)
2. Zahida khatoon HM GGHS Singoor Member
3. Farzana Bibi SST GGHS Drosh Member
4. Latifa BIBI SST GGMS Tholiandeh Ayun Member
5. Bibi Sardaran SST GGMS Shagram Turkhow Member
6. Maimona Bibi SST GGMS Brep Member

Hameeda Bibi
S. NO 19

The meeting started with the recitation of the Holy Quran by Zahida Bibi HM. After detail discussion the committee accepted the appeal of the following teachers and made the following decisions.

S #	Name of the Teacher with Designation	Name of the school where be transferred	To	Remarks/ Reasons
1	Mumtaz Jamal SST	GGMS Seen Lasht	GGMS Chumurkhon	Retained /recommended by DC Chitral
2	Shahnaz Bibi SST	GGMS Broze	GGMS Seenlasht	Her own Choice
3	Farzana Bibi CT	GGHS Shoghoor	GGMS Bakarabad	Appeal is accepted
4	Bibi Fatima CT	GGMS Bakarabad	GGHS Shoghoor	May be transferred in place of vide # 3
5	Kishwar Sultana CT	GGHS Baranis	GGMS Mroi	Appeal accepted and may be transferred to GGMS Moroi to facilitate Vide no 6 and Jamila Nargis from GGMS Mori Lasht to GGHS Barenis
6	Nusrat Rehman CT	GGMS Mroi	GGMS Mori Lasht	Do
7	Suhrab Bibi CT	GGMS Charun	Retained	Appeal accepted and retained
8	Gul Naz Bibi CT	GGMS Loan	Retained	Appeal rejected due to less tenure
9	Tahira Shireen PET	GGMS Jinjirit	GGMS Kesu	Must implement transfer order 26 th July 2014 till the decision of enquiry committee.
10	Sumera Zafar PET	GGMS Kesu	GGMS Jijirat	Must implement transfer order 26 th July 2014 till the decision of enquiry committee.
11	Bibi Sabiha DM	GGMS Garam Chashma	GGHS ShiaqoteK	Appeal accepted and she will be retained in GGHS Shiaqotek. The applicant is under tenure and also has spent 11 years in hard station.
12	Malka Dur Shahwar DM	GGHS Shiaqotek	GGHS Garam Chashma	She will be transferred to GGHS Garam Chashma as she exercised

Approved
23/8/14



13	Zakia Minhas DM	GGMS Moroi	GGMS Baker Abad	longest tenure in local station. Appeal accepted due to health problem of the applicant and may be transfer against S.No. 14
14	Ghulam Khadija DM	GGMS Baker Abad	GGMS Moroi	She has a longest tenure holder in local stations.
15	Bibi Fatima TT	GGMS Mori Lasht	GGMS Bakerabad	Appeal accepted due to health problem
16	Fasmina Jahan TT	GGMS Bakerabad	GGMS Mori Lasht	Completed her tenure in GGPs Bakerabad
17	Husun Ara PST	GGMS Birgadani	Retained	Retained in GGPS Birgadani
18	Amrozia Jahan PST	GGPS Birgadani	GGPS Birga Bala	Back to original School (GGPS Birga Bala)
19	Hamida Bibi PST	GGPS Aryam	GGPS Zondrangram	Hamida Bibi will be adjusted in Chitral Sub-division wherever post is available due to her health problem
20	Zar Begum PST	GGPS Zondrangram	GGPS Aryam	Perform her duty in GGPS Ariyan as per transfer order
21	Saeda Naz PST	GGPS Kari	GGPS Mori Payeen	May be transferred to GGPS Mori Payeen due to longest tenure in local station.
22	Zahanat Jabeen PST	GGPS Mori Payeen	GGPS Kari	Appeal accepted and may be transfer to GGP Kari due to less tenure in her UC
23	Naushad PST	GGPS Istaru	Adjusted to GGPS Morder	Adjusted due to rationalization
24	Faizun Nisa	GGPS Istaru	Adjusted to GGPS Kushum Bala	Adjusted in rationalization
25	Khadija Mastoor PST	GGPS Shoghor	GGCMS Mori Bala	Matual with S.No. 26
26	Mubarek Bibi PST	GGCM Mori Bala	GGPS Shoghor	Matual with S. No. 25
27	Saliha Bibi SST	GGCHS Denin	GGHS Koghuzi	Appeal accepted and may be retain in GGHS Koghuzi against S.No. 28
28	Khonza Nisa SST	GGHS Koghuzi	GGCMHS Denin	Retained against S.No. 27
29	Irshad Bibi Qaria	GGCMHS Denin	GGHS Moldeh	May be transfer due to completion of tenure
30	Jahan Taj Qaria	GGHS Moldeh	GGCMHS Denin	Completion of tenure
31	Yasmin Gul Qaria	GGHS Reshun	GGHS Koghuzi	Due to longest tenure
32	Bashira Sultana Qaria	GGHS Koghuzi	GGHS Reshun	Due to longest tenure
33	Shahanza Rani AT	GGHS Moldeh	GGHS Drosch	On the recommendation of High Authority
34	Gul Faria AT	GGHS Drosch	GGHS Moldeh	S.V.NO 33 & longest Tenure

The meeting ended with the vote of thanks from and to the chair.

WITNESSED
 Malim Khan Bangash
 Advocate
 23/11

Samina Jahan
Principal GGHS Ayun (Chairperson)

Zahida khatoon
HM GGHS Singoor (Member)

Farzana Bibi SST
GGHS Drosh (Member)

Latifa BIBI SST
GGMS TholiandehAyun (Member)

Bilbi Sardaran SST
GGMS Shagram Turkhow (Member)

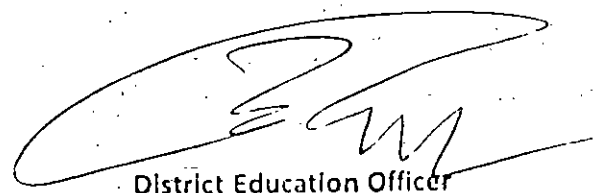
Maimuna Bibi SST
GGMS Brep (Member)

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) CHITRAL

Endst: No. 4743-82 /EB.(F) /Minute/Meeting dated Chitral the 29/8 /2014

Copy forwarded to the:-

- 1. Director Elementary & Secondary Education Khyber Pakhtoon Khwa Peshawar for information, please
- 2. Deputy Commissioner Chitral, for information, please



District Education Officer
(Female) Chitral

Attested
 ATTESTED
 Halim Khan Bangash
 Advocate
 29/8/14

To,

The Director,

School & Literacy, KPK, Peshawar

Subject: DEPARTMENTAL APPEAL AGAINST TRANSFER

Respected Sir:

1. That the appellant is serving in G.P.S, Aryan, District Chitral as PST Teacher.

2. That the husband of the appellant is also teaching as Professor in Govt Degree College, Chitral.

3. That suddenly, the EDO, Chitral transferred the appellant from G.P.S Aryan, Chitral to G.P.S Zondrangram vide order dated 26.07.2014. (Copy of transfer order is attached).

4. That the appellant then filed review application before the EDO, Chitral for recalling of the transfer order dated 26.07.2014, wherein appellant's review application was although accepted, but no order was made for re-posting of the appellant to her old place i.e. G.P.S Aryan, District Chitral. (Copy of order dt.29.08.2014 is attached).

5. That subject to the notification/ policy of the Education Deptt that both the spouses will be posted at the same station, but the appellant was picked and posted from City Chitral to Tehsil Morku, which is far-flung area of Upper Chitral of more than 200 kilometers from City Chitral.

Handwritten notes and stamps: "Attended", "15/19/14", "A.G.S.S.E.D", "Halim Khan Sangash", "Advocate", "20/11/14".

Handwritten signature: "Zahid Khan"

Handwritten number: "566" and date: "15/19/14"

6. That this transfer order is not only against the spouse policy but also manifest discrimination on the part of respondent department, hence hit at the core of Article 25 of the Constitution of Islamic Republic of Pakistan, 1973, thus, both orders needs to be recalled/ cancelled accordingly.

7. That the appellant is already suffering from peptic ulcer (stomach disease) and traveling to far flung / hilly area, is much painful and difficult, hence appellant be re-posted to her old station i.e. GGPS Aryan, District Chitral

8. That the transfer order of the appellant is clear-cut violation of transfer/posting and appointment rules and spouse policy has been virtually brought to zero.

It is, therefore, most humbly prayed that on acceptance of the instant departmental appeal, the impugned office orders dated 26.07.2014 and 29.08.2014 may kindly be set aside and the appellant may kindly be re-posted in her original position i.e. GGPS Aryan, Chitral.

Appellant

Ms. Namceda Bibi
GGPS Aryan, City Chitral
District Chitral

Date: 15/09/2014

APPEAL
23/1/14
Advocate
Majid Khan Bano
District Chitral

Directorate of Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

No. 6937 /F.No.28/(F)/Appeal Dir.

Dated Peshawar the 24/9 /2014.

To

The District Education Officer,
(Female) Chitral

Subject APPEAL.

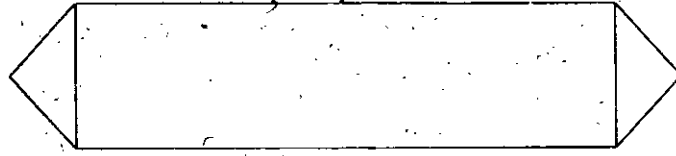
I am directed to refer to enclose herewith a copy of application regarding transfer in respect of Mst. Hameeda Bibi PST GGPS Aryan City Chitral on the subject cited above and to ask you to decide the case at your own level as per rules/policy.

[Signature]
23/9/14
Deputy Director Female
(E&SE) Khyber Pakhtunkhwa.

[Signature]
25/9/14

[Signature]
23/9/14
ATTESTED
Hafiz Khan Bhat
Advocate

بعدالت خاصہ حیدرآباد سرکس اسٹیشن



23 - 10 - 14

مورخہ

2014ء منجانب اعلیٰ عدالت
بنام ڈاکٹر خالد حسین

حسان محمد بن سنی
757

مقدمہ سرکس اسٹیشن

دعویٰ

جرم

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ السرطان احمد کے
آن مقام لسٹ اور کیلئے حلیم خان منسٹر اعلیٰ عدالت کے
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 پر حلف دینے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور وصولی چیک دروپ یہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق
ذرائع 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 مختار 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 مذکورہ باختیارات حاصل ہوں گے
اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے
سبب سے وہ ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں
گے۔ کہ پیروی مذکور کریں۔ لہذا دکالت نامہ لکھ دیا کہ سندر ہے۔

2014

23 ماہ اکتوبر

المرقوم

Accepted
Hafiz

حیدرآباد
23/10/14

العہد گاہ العہد گاہ

مقام کے لئے منظور ہے۔

Handwritten signature