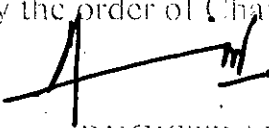


FORM OF ORDER SHEET

Court of _____

Appeal No. 2025/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	05/10/2023	<p>The appeal of Mst. Bibi Saira presented today by Mr. Muhammad Javed Khan Advocate. It is fixed for preliminary hearing before touring Single Bench at Swat on _____</p>
		<p>By the order of Chairman  REGISTRAR</p>

BEFORE THE KHYBAR PAKHTUNKHWA SERVICE TRIBUNAL

/CAMP COURT AT GULKADA SWAT

Service Appeal No. 2025 of 2023

Mst. Bibi Saira

VERSUS

Govt. of K.P.K & others.

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APPELLANT

Mst. Bibi Saira

Through Counsel

MUHAMMAD JAVAID KHAN

Advocate, Supreme Court of Pakistan

Office: Near Allah-u-Akbar Masjid, College

Colony Saidu Sharif Swat.

Cell No. 0343-9607492

(1)

BEFORE THE KHYBAR PAKHTUNKHWA SERVICE TRIBUNAL
/CAMP COURT AT GULKADA SWAT

Service Appeal No. 2025 of 2023

Mst. Bibi Saira D/o Abdul Rashid Khan R/o Bagra Tehsil Daggar
District Buner.(Appellant)

VERSUS

1. Government of Khybar Pakhtunkhwa through Secretary Elementary and Secondary Education at Civil Secretariat Peshawar.
2. Director Elementary and Secondary Education Khybar Pakhtunkhwa at Peshawar.
3. District Education Officer (Female) District Buner at Daggar.
.....(Respondents)

Appeal U/s 4, of the Khybar Pakhtunkhwa Service Tribunal Act, against the cancellation order No.2065 dated 26/12/2022 issued by respondent No.3, whereby the office order / posting order No.1976-82 dated 26/12/2022 of the appellant has been cancelled illegally, unlawfully, unconstitutionally.

PRAYER:

On acceptance of this Service Appeal the cancellation / final order No.2065 dated 26/12/2022 issued by the respondent No.3 may be declare illegal, unlawful and the Office order / posting order No.1976-82 dated 26/12/2022 of the appellant at G.G.H.S Koza Nawagai District Buner, may kindly be restored. Or in the alternative the appellant be posted on vacant post of C.T at GGHS Koza Nawagai.

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Respectfully Sheweth:

1. That the appellant was appointed as certified Teacher (C.T) at Government Girls Middle School Langar Tehsil Mandaur District Buner vide order No.10855-64 dated 11/01/2019.(Copy of order is attached as annexure A).
2. That after performing her duties for more than three years at the said station, the appellant applied for transfer to Govt. Girls High School Koza Nawagai, which is at the distance of 40 KM, from the home village of the petitioner, vide application dated 31/3/2022. Contents of the said application may be considered as integral part of this Service appeal. It is pertinent to mentioned that GGMS Langar is at a distance 90 K.M from the home village of the petitioner. (Copy of application dated 31/3/2022 is attached as annexure B).
3. That the respondent- No.3 then issued a transfer order No.1976-82 dated 26/12/2022 and the appellant was transferred from G.G.M.S Langar to G.G.H.S Koza Nawagai. (Copy of transfer order No.1976-82 dated 26/12/2022 is attached as annexure C).
4. That in continuation of the said transfer order the appellant relinquished the charge of C.T at G.G.M.S Langar on 26/12/2022 before Noon. (Copy of the charge relinquished certificate is attached as annexure D).
5. That the appellant than took the charge of C.T at G.G.H.S Koza Nawagai on 26/12/2022 after Noon.
6. That the appellant then performed her duty at G.G.H.S.S Koza Nawagai as C.T Teacher regularly and received her salary accordingly. (Copy of pay slip is attached as annexure F).

7. That then all of a sudden the respondent No.3 has issued an explanation letter to the appellant No. 769-79 dated 01/4/2023, whereby it was stated that the transfer order of the appellant dated 26/12/2022 was canceled on the same day vide End. No. 2065 dated 26/12/2022. (Copies of explanation letter No. 769-79 dated 01/4/2023 and cancellation letter End. No. 2065 dated 26/12/2022 are attached as annexure F&G).
8. That the appellant, responding to the said explanation letter submitted representation dated 15/5/2023 to respondent No.3 for her redressal. (Copies of representation dated 15/5/2023 are attached as annexure H).
9. That the respondent No.3 was not taking any action in respect of the prayers of the appellant in the said representation dated 15/5/2023, hence the appellant filed Writ Petition No. 904-M of 2023, before the Peshawar High Court Mingora Bench Swat. (Copy of Writ Petition No. 904-M of 2023 is attached as annexure I).
10. That the said Writ Petition No. 904-M of 2023 was decided on 13/09/2023 and the appellant was directed to approach appropriate forum for her redressal. (Copies of order dated 13/9/2023 is attached as annexure J).
11. That the appellant being aggrieved from the impugned cancellation order 2065 dated 26/12/2022 and no action / no response attitude of respondent No.3 towards the representation of the appellant dated 15/5/2023, the appellant is knocking at the doors of this Honourable Tribunal, inter alia on the following grounds.

GROUNDS:

- i. That the action and inaction of the respondents towards the grievance of the petitioner, is illegal and unlawful, unconstitutional.

G
G

- ii. That the action and inaction of respondents is violation of Article 4,8,25, 38 (e) of the constitution of Islamic Republic of Pakistan 1973.
- iii. That the cancellation order No. 2065 dated 26/12/2022 is illegal, unlawful and unconstitutional.
- iv. That the cancellation order No. 2065 dated 26/12/2022 is illegal unlawful and unconstitutional, for the reasons that two other teachers namely Halima C.T BPS-15 and Kalsoom Bibi T.T BPS-15 have been transferred from the said School GGMS Langar to GGMS Elai and GGMS Bampokha respectively vide order No.1781-86 dated 03/6/2023 and notification 1948-53 dated 13/6/2023. (Copies of the orders are attached as annexure K).
- v. That similarly the notification No. 1205-11 dated 13/5/2023 vide which Rani Andalip C.T has been transferred from GGHSS Chinglai to GGHS Koza Nawagai, is illegal and discriminatory for the reasons that the said Teacher belongs to Bara Nawagai which is near to Chinglai as compare to the posting place of the appellant.
- vi. That the impugned notification as well as inaction of the respondents towards the grievance of the respondents is also against the E-transfer policy of the Provincial Government Dated 11/9/2019. (Copy of E-transfer policy is attached as annexure L).
- vii. That the impugned notification as well as inaction of the respondents is violation of the Transfer Policy of the Provincial Govt. of 2009. (Copy of transfer policy 2009 is attached as annexure M).
- viii. That recently marriage of the appellant has taken place and the appellant has now shifted to Village Faiz Abad Tehsil Mandanr District Buner, and a vacant post at GGHS Koza Nawagai of C.T(F) is laying near to the Village of her husband, wherein he is also serving as PST at Nawagai U.C.

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ix. That some other grounds will be argued at the time of arguments with the prior permission of this Honourable Tribunal.

12. That this appeal has been filed against the cancellation order No.2065 dated 26/12/2022 issued by respondent No.3, against which the appellant has filed representation dated 15/5/2023 before the respondent No.3 which has not been decided as yet, hence this Honourable Tribunal has got jurisdiction and this appeal is within time, keeping in view the fact that after the representation dated 15/5/2023 the appellant filed Writ petition No.904-M of 2023, before the Peshawar High Court Mingora Bench Swat, which was decided on 13/9/2023, in this regard an application for condonation of delay is also being filed with this Service Appeal.

It is therefore, humbly prayed that on acceptance of this Service Appeal the cancellation / final order No.2065 dated 26/12/2022 issued by the respondent No.3 may be declared illegal, unlawful and the Office order / posting order No.1976-82 dated 26/12/2022 of the appellant at G.G.H.S Nawagai District Buner, may be restored.

Or

The appellant May be adjusted at the newly vacated C.T post at GGHS Kuza Nawagai Tehsil Mandanr District Buner.

Or

In the alternative the respondents may be directed to adjust the appellant against the vacant post of C.T at G.G.M.S Dhand Maira Tehsil Mandanr District Buner.

Any other remedy which has not specifically been prayed for and to which the appellant is entitled may also be granted in favour of appellant.

APPELLANT

Through Counsel

MUHAMMAD JAVAID KHAN

Advocate, Supreme Court of Pakistan

(C)

BEFORE THE KHYBAR PAKHTUNKHWA SERVICE TRIBUNAL
/CAMP COURT AT GULKADA SWAT

Service Appeal No. _____ of 2023

Mst. Bibi Saira

VERSUS

Govt. of K.P.K & others.

CERTIFICATE:

It is, certified that no such like Service appeal has earlier been filed before Honourable court, or any other competent court.

APPELLANT

Mst. Bibi Saira

Through Counsel

MUHAMMAD JAVAID KHAN

Advocate, Supreme Court of Pakistan

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BEFORE THE KHYBAR PAKHTUNKHWA SERVICE TRIBUNAL
/CAMP COURT AT GULKADA SWAT

Service Appeal No. _____ of 2023

Mst. Eibi Saira **VERSUS** Govt. of K.P.K & others.

AFFIDAVIT

I, Mr. Inayat Ullah S/o Ihsan Ullah R/o Faiz Abad Tehsil Mandanr District Buner (Special attorney of appellant), do hereby state on oath that the contents of this Service appeal are true and correct to the best of my knowledge and belief.



DEPONENT,

E. Ullah
Appellant through special attorney:

Mr. Inayat Ullah

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BEFORE THE KHYBAR PAKHTUNKHWA SERVICE TRIBUNAL
/CAMP COURT AT GULKADA SWAT

Service Appeal No. _____ of 2023

Mst. Bibi Saira VERSUS Govt. of K.P.K & others.

MEMO OF ADDRESSES

ADDRESS OF THE APPELLANT:

Appellant through special attorney Mr. Inayat Ullah S/o Ihsan
Ullah R/o Faiz Abad Tehsil Mandanr District Buner.

CNIC No. 15101-4293186-7

Cell No. 03479001304

ADDRESSE OF THE RESPONDENTS:

1. Government of Khybar Pakhtunkhwa, through Secretary -Elementary and Secondary Education at Civil Secretariat Peshawar.
2. Director Elementary and Secondary Education Khybar Pakhtunkhwa at Peshawar.
3. District Education Officer (Female) District Buner at Dggar.

APPELLANT

Mst. Bibi Saira

Through Counsel

MUHAMMAD JAVAID KHAN

Advocate, Supreme Court of Pakistan

(9)

BEFORE THE KHYBAR PAKHTUNKHWA SERVICE TRIBUNAL
/CAMP COURT AT GULKADA SWAT

Service Appeal No. _____ of 2023

Mst. Bibi Saira VERSUS Govt. of K.P.K & others.

Application for condonation of delay (If any).

Respectfully Sheweth:

1. That the above titled case is filed before this Honourable court in which no date of hearing has yet been fixed.
2. That the appellant / applicant request for condonation of delay (If any), inter alia on the following grounds.

GROUND:


- a. That the respondent No.3 issued cancellation order No.2065 dated 26/12/2022, against which the appellant filed representation dated 15/5/2023 before the respondent No.3, which has not yet been decided. It is pertinent to mentioned that after the filing of representation dated 15/5/2023, the appellant filed Writ petition No.904-M of 2023, before the Peshawar High Court Mingora Bench Swat which was decided on 13/9/2023 and the appellant / applicant was directed to approach proper forum.
- b. That the time spent before the Peshawar High Court Mingora Bench Swat, in the Writ petition mentioned in the main appeal, which condonable according to Section-5 of the limitation Act read with Section 9 of the Khybar Pakhtunkhwa Service Tribunal Act 1974, and Rule 8 of the Khybar Pakhtunkhwa Service Tribunal Rules 1974.

- c. That according to the judgments of the Superior Courts technicalities should not hamper the course of justice in the powers regarding condonation Under Section 5 of the limitation 1908, should be liberally exercised to ensure administration of justice and its true spirits, in this regard wisdom may be grant from 2011 MLD page 1564.
- d. That the impugned cancellation order is a void order, hence no limitation runs against challenging of the void order, wisdom may be drawn from 2004 YLR page 1050.

It is therefore, humbly prayed that on acceptance of this application the delay may kindly be condoned if any.

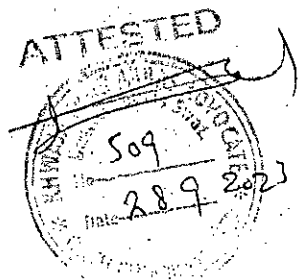
APPELLANT 
Mst. Bibi Saira

Through Counsel



MUHAMMAD JAVAID KHAN
Advocate, Supreme Court of Pakistan

AFFIDAVIT

It is state on oath that the contents of this application are true and correct to the best of my knowledge and belief.



DEPONENT


Appellant through special attorney:
Mr. Inayat Ullah

To be substituted with same Indst. No. & Date

REVISED

11

Annexure
(A)



OFFICE OF THE DISTRICT EDUCATION OFFICER
(F) DISTRICT BUNER
PHONE & FAX NO. 0939-510366
EMAIL: deofemalebuner@gmail.com

OFFICE ORDER

Consequent upon recommendation of the District Selection Committee, appointment of the following candidates is hereby ordered against the vacant posts of CT, in BPS-15 (Rs.16120-1330-56020) @ Rs. 16120/- fixed plus usual allowances as admissible under the rules on adhoc/ contract basis under the existing policy of the Provincial Government, in Teaching Cadre (School Based), on the terms and condition given below, with effect from the date of taking over charge (Summer Zone from 11-01-2019 and Winter Zone from 01-03-2019) in the best interest of public service.

Disable Candidate @ 2%

S.#	Roll No	Name	CNIC No.	Father Name	D.O.B	School Name	Remarks
1	1411000970	RUKHAYA	15101-5456470-8	MUHAMMAD REHMAN	15/05/1987	GGMS ELAI	A.V.P
2	3411000042	SALMA	15101-9556531-2	UBAID ULLAH	04/04/1988	GGMS JOWAR NO.2	A.V.P

Minority Candidate @ 3%

S.#	Roll No	Name	CNIC No.	Father Name	D.O.B	School Name	Remarks
1	1411000960	POOJA LONGANI	15101-2722314-8	ASHOK KUMAR	07/12/1985	GGHSS CHEENA	A.V.P
2	1411000734	DEENA KUMARI	15101-4867756-4	GOR CHARAN	11/04/1994	GGHSS PACHA KALAY	A.V.P
3	3111000397	HINA RANI	15101-7389131-8	AMRIK LAL	05/04/1986	-GGHSS PANJTAR	A.V.P

Open Merit Candidates:

S.#	Roll No	Name	CNIC No.	Father's Name	D.O.B	School Name	Remarks
1	3112001396	MARINA SULTAN	15101-4624343-8	SULTAN E ROOM	05/04/1992	GGHSS TOTALAI	A.V.P
2	1411000242	MUSARAT RAHMAN	91506-0139274-2	INAYAT UR RAHMAN	28/02/1990	GGMS AMBELA	A.V.P
3	1411000662	WAGMA	17301-1552499-8	MUHAMMAD RAZA	03/05/1993	GGHS KINGER GALAI	A.V.P
4	3112000434	UZMA JAMSHAD	16202-0850518-6	JAMSHAD ALI KHAN	15/11/1982	GGMS HALL	A.V.P
5	1411000100	MUNAIRA FAROOQ	91506-0129082-0	INAYAT RAHMAN	23/02/1997	GGPMS JICA DAGGAR	A.V.P
6	1411000759	TAMMANA BIBI	15101-7475208-0	ZARDULLAH KHAN	06/10/1995	GGHS ANGHAPUR	A.V.P
7	1412000134	BIBI ASMA	15101-3188378-8	BHQDI REHMAN	03/03/1980	GGHSS PACHA KALAY	A.V.P
8	1411000561	NAZAKAT BIBI	15101-9893395-0	SAMI ULLAH	25/03/1994	GGPMS JICA DAGGAR	A.V.P
9	1412000085	NAILA BIBI	15104-0338037-0	MUHAMMAD BOPERS	05/04/1993	GGMS KHANANO DHERAI	A.V.P

10	1411000680	MARYAM	15101-4796142-4	ZOOR TALAB KHAN	23/03/1993	GGHS KINGER GALAI	A.V.P
11	1411000854	KHUSHNUMA	15101-6034019-6	GUL SADBAR	22/03/1993	GGHS BAGRA	A.V.P
12	3111000757	ROQQAYA SUBHAN	16101-3908186-8	SUBHAN ULLAH	10/02/1996	GGHS KASS KOROONA	A.V.P
13	1411000608	SUNIL	15103-0571282-6	BAKHT SHERWAN	22/03/1990	GGHSS CHINGLAI	A.V.P
14	1411000108	SALMA BEGUM	15101-9979830-2	SHAHZULLAH	25/04/1992	GGHS BAGRA	A.V.P
15	1411000066	AISHA BIBI	15101-7399875-6	MUHAMMAD SHAFIQ	25/01/1994	GGHSS PACHA KALAY	A.V.P
16	1411000724	SEEMAB	15101-7432726-2	DOST MUHAMMAD KHAN	27/11/1996	GGMS BATAI	A.V.P
17	1411000463	RABIA KAUSAR	15101-2647738-8	KHAN GUL	16/02/1993	GGHSS SHALBANDAI	A.V.P
18	1411000833	ASMA AMIN	15101-6970970-8	AHMAD AMIN	14/03/1989	GGMS CHANAR	A.V.P
19	1411000795	AQEELA FAROOQI	15101-1865528-8	SULTAN HUSSAIN FAROOQI	15/03/1994	GGHS SOWARI	A.V.P
20	1411000545	SHEEBA KANWAL	15101-5127740-0	TAJ MALOOK	02/03/1991	GGMS REGA	A.V.P
21	1412000031	FAZIZ UN NISA	15102-0567468-0	GUL ZADA	19/03/1990	GGMS GIRARAI	A.V.P
22	1411000972	BAKHT BILANDA JEHAN	15101-6295675-8	BAKHT JEHAN KHAN	01/04/1995	GGMS BAMPOKHA	A.V.P
23	1411000796	LUBNA	15101-7799115-2	SAID QAMAR SHAH	07/02/1991	GGHSS CHEENA	A.V.P
24	2911001408	SHAZIA HAKIM	15102-0573671-0	HAKIM SHAH	27/02/1993	GGMS CHANAR	A.V.P
25	1411000952	ALIA	17301-7121172-2	MIAN WALI	26/04/1988	GGHSS NAWAGAI	A.V.P
26	1411000069	SUMAIRA KHATOON	15103-0569378-4	AHMAD ALI	03/03/1990	GGHSS TOTALAI	A.V.P
27	1411000928	SHAZIA KHAN	37405-9831230-0	SAID KARIM	10/10/1991	GGMS NAGRAI	A.V.P
28	1412000314	MADIHA RAHMAN	15302-2062095-4	MAQSOOD UR RAHMAN	07/05/1993	GGHS KARAPA	A.V.P
29	1412000006	RANI ANDALEEB	15104-0333506-6	HIDAYAT ULLAH	07/07/1994	GGHSS KORYA	A.V.P
30	1412000072	NEELUM BIBI	42201-6702142-0	KHAZER KHAN	07/07/1989	GGMS ELAI	A.V.P
31	1411000733	ASMAT ARA	15101-7341206-6	SIRAJ KHAN	02/08/1990	GGMS AMNAWAR	A.V.P
32	1411000397	ASIA	42501-8831988-2	MANARAS KHAN	16/02/1990	GGHSS PACHA KALAY	A.V.P
33	1412000279	MUHSINA	15101-8907352-6	AZIZ UR RAHMAN	25/04/1995	GGMS KUZ GKOAND	A.V.P
34	141200027	NAZO ZARIN	15101-2406582-2	ZARIN	03/03/1995	GGHSS PACHA KALAY	A.V.P
35	1411000573	NADIA	61101-8453855-2	RAHAMDIL KHAN	25/10/1985	GGMS GIRARAI	A.V.P
36	1411000467	ALIA NAZ	15101-8602115-2	GUL QABAB	05/12/1989	GGHS KAWGA	A.V.P
37	1411000042	ZAITOON	16101-6546510-2	NOOR ULHAQ	21/07/1993	GGMS BAMPOKHA	A.V.P
38	1411000519	NARGIS BEGUM	15102-0584837-0	ABDUL HUSSAIN SHAH	03/05/1993	GGMS DEWANA BABA	A.V.P
39	1411000125	BUSHRA BEGUM	15102-0574537-3	SHER NABI	17/02/1989	GGMS BAJKATA	A.V.P
40	1442000276	AMINA BIBI	15101-7755762-8	AURANGZEB	25/04/1995	GGHSS CHEENA	A.V.P
41	3112000823	SANODIA RASHEED	37406-6183525-0	MUHAMMAD RASHEED	03/03/1995	GGHS DAGAI	A.V.P
42	1412000316	SAIMA	15101-8570357-6	ABDULHAQ	25/10/1985	GGHSS SHALBANDAI	A.V.P
43	1411000844	RAFIQA MALIK	15101-2682750-6	SAID MALIK	05/12/1988	GGMS TINAWLO DHERAI	A.V.P
44	1412000037	NAILA	15101-0728587-4	AMIR SHAD	21/07/1993	GGHS BAGRA	A.V.P
45	1411000577	HUSAN ARA	15104-0339585-4	ARZAO	03/08/1983	GGHS MAKHRANAI	A.V.P
46	1411000966	SALMA	15101-6604796-8	AJUMUR RAHMAN	17/02/1989	GGHS BAGRA	A.V.P
47	1411000314	SALMA	15102-0581604-2	SAKHAWAT SHAH	25/04/1995	GGMS BAJKATA	A.V.P

48	1411000762	NAGEENA MALIK	15101-3788175-4	MALIK ZADA	07/11/1995	GGMS DEWANA BABA	A.V.P
	1412000212	HUZAIFA	17301-9057070-4	CAREEB ULLAH	13/03/1992	GGHS KINGER GALAI	A.V.P
50	1411000079	LAILLUNAHAR	15101-2248472-2	FAZLI HAKEEM	20/09/1994	GGMS BARKALAY	A.V.P
51	141100528	ISHRAT BEGUM	15101-3427184-9	HAMIM	10/04/1994	GGHSS SHALBANDAI	A.V.P
52	1412000150	JAMILA BIBI	15101-3427184-8	ALIM HAIDAR	10/04/1994	GGHSS CHEENA	A.V.P
53	1411000010	RIFFAT BIBI	15101-3129399-6	HAZRAT RAHMAN	10/03/1992	GGMS AMBELA	A.V.P
54	1411000296	MEHNAZ BIBI	15101-6381953-6	SYED RAHIM SHAH	09/04/1995	GGHSS PACHA KALAY	A.V.P
55	1412000061	TANZILA ANMOL	15101-2970797-6	UMREEN	03/02/1986	GGHS BAGRA	A.V.P
56	3112000256	SUMBAL BEGUM	15101-4093148-2	MASWALI SHAH	30/12/1993	GGHSS TOTALAI	A.V.P
57	1411000399	SHAISTA	15101-7308202-4	MUHAMMAD AKBAR	18/02/1987	GGHSS SHALBANDAI	A.V.P
58	1412000254	SABIRA BIBI	15103-0574025-0	BAKHT ZADA	12/04/1996	GGMS NANSER	A.V.P
59	1412000131	HAZIRA BEGUM	15101-7308202-4	KHALIL UR RAHMAN	18/02/1987	GGHSS SHADAM	A.V.P
60	1411000588	NAJMA	15101-7541055-6	BAKHT BILAND KHAN	01/09/1992	GGMS KUZ GOKAND	A.V.P
61	1412000260	AMINA BIBI	15101-7141062-6	KHAIRUL BASHAR	02/04/1995	GGMS PANDIR	A.V.P
62	3113000826	SHABANA ILYAS	15101-7820000-0	ILYAS KHAN	10/06/1988	GGHS KASS KOROONA	A.V.P
63	1412000259	AZMIA JEHAN	15101-7541055-6	BAKHT JEHAN KHAN	01/09/1992	GGHSS SAZARGAY	A.V.P
64	1411000522	NAJAM SABA	15101-8364037-6	AMIR AKBAR SHAH	06/07/1995	GGMS KHANANO DHERAI	A.V.P
65	1411000186	MARIA BIBI	15101-9158084-8	TAJ MUKHTIAR KHAN	17/03/1995	GGMS TORWARSAK	A.V.P
66	1411000713	SAJILA HASSAN	15402-9217116-2	SAID	24/10/1994	GGMS TORWARSAK	A.V.P
67	1412000186	SARA KHAN	15101-3513077-0	MUHAMMAD KHAN	02/04/1994	GGHSS CHEENA	A.V.P
68	1411000430	RUBINA SAEED	42401-4947522-4	AHMED SAEED	21/03/1991	GGMS KATKALA	A.V.P
69	1412000257	BENISH NASIR KHAN	42401-4947522-4	NASIR KHAN	21/03/1991	GGHS SURA	A.V.P
70	1411000471	ASMA KHAN	15101-2832495-2	INAM ULLAH	28/04/1990	GGHSS PANJTAR	A.V.P
71	1411000661	SHABANA TAYIB	15101-6023553-6	MUHAMMAD TAYIB	01/02/1985	GGHS KAWGA	A.V.P
72	1412000194	SHABNUM BIBI	15102-0581941-2	MIAN SHAH SAHIB	13/02/1993	GGHS MATWANAI	A.V.P
73	3113000332	SAYEDA AYESHA BIBI	16202-9797134-0	SYED SHAKIR ULLAH	17/03/1990	GGHSS TOTALAI	A.V.P
74	1412000249	AZMAT	15102-0581941-2	MUSTAFA KHAN	18/02/1993	GGHS KASS KOROONA	A.V.P
75	1411000925	ZAINAB	15101-5379872-4	SHAUKAT ALI	23/03/1992	GGHSS PANJTAR	A.V.P
76	1411000009	NABILA AMAN	16202-0313091-4	MALAK AMAN	30/10/1990	GGHS AMAZO KOTO	A.V.P
77	1411000457	SAIRA GUL	15101-4732595-8	GUL MUHAMMAD	21/03/1995	GGHSS CHINGLAI	A.V.P
78	3111000877	MADIHA ISLAM	90403-5141467-8	ISLAM WALI KHAN	30/03/1993	GGHSS CHINGLAI	A.V.P
79	1411000446	MARYAM	15101-7644823-0	BAKHT REHMAN	06/05/1989	GGMS DAND MAIRA	A.V.P
80	1411000938	NIHAYAT BIBI	15102-0581652-4	RAJAB KHAN	20/02/1995	GGMS GUL BANDAI	A.V.P
81	1411000958	SAIMA KHATOON	15103-0569382-8	AHMAD ALI	27/08/1994	GGHSS NOGRAM	A.V.P
82	1411000062	SAIMA	15101-5325592-0	SULTAN BAHADAR	20/04/1990	GGHSS PANJTAR	A.V.P
83	1411000964	ASMA GUL KHAN	15101-0271223-0	MUHAMMAD IDRIS	18/10/1990	GGMS DAND MAIRA	A.V.P
84	1411000934	ASIA BIBI	15101-2936556-8	BAKI ISHAID ULLAH	20/03/1996	GGHSS CHINGLAI	A.V.P
85	1411000563	MINHAZ BEGUM	15102-0578144-0	KHAWAJA AMIN SHAH	01/09/1991	GGHSS SAWAWAI	A.V.P

(14)

86	3112000517	ISMAL HUDA	15101-2315445-6	SAJAWAL SHAH	02/02/1990	GGMS DAKARA	A.V.P
87	1411000287	HEERA KHAN	16202-4511792-2	AFZAL KHAN	01/02/1996	GGHSS TOTALAI	A.V.P
88	1412000275	SALMA	15101-4769899-0	ASHPAR KHAN	25/01/1991	GGHSS PANJTAR	A.V.P
89	1411000299	ZAKIA NAZ	15101-8985096-8	SAID KABOOT SHAH	04/04/1991	GGHSS KORYA	A.V.P
90	1412000113	SOBIA	15104-0333582-2	HIDAYAT UL HAQ	07/04/1994	GGHSS TOTALAI	A.V.P
91	1411000231	HALIMA	15101-1742621-6	MUHAMMAD ZADA	22/01/1984	GGMS LANGAR	A.V.P
92	3112000885	FOZIA AKBAR	15103-7764007-2	WALI AKBAR	18/09/1989		APPOINTMENT ORDER IS HEREBY WITHDRAWN
93	1411000843	AZRA	15104-0336120-4	BAKHT AKBAR	13/05/1993	GGHSS SHADAM	A.V.P
94	3112000417	ZUNAIRA GUL	15101-6681237-8	BAHRAMAND KHAN	30/05/1994	GGMS HALL	A.V.P
95	1411000663	MEHWISH	42301-7649950-8	ABDUL REHMAN	15/10/1988	GGMS KADAL	A.V.P
96	1411000930	NEELAM	42301-0624117-0	ABDUL HAMEED	10/01/1994	GGMS NAGRAI	A.V.P
97	1411000408	SHABANA	15101-7976815-8	RAZI MULK	10/04/1993	GGHSS SHADAM	A.V.P
98	1411000957	RIZWANA ALEEM	15102-0578727-2	MUHAMMAD ALEEM	09/04/1995	GGMS BAIKHANAY	A.V.P
99	1411000240	KHALIDA	15101-0271800-0	HIDAYATULLAH	20/02/1991	GGHS CHARORAI	A.V.P
100	1411000548	BIBI SAIRA	15101-0206943-8	ABDUL RASHID KHAN	15/04/1991	GGMS LANGAR	A.V.P
101	1412000298	FADIA	15101-5491684-2	SHAH RAS KHAN	07/03/1994	GGMS KADAL	A.V.P
102	3112001361	SANA	15103-0574072-0	REHMAN SHAH	12/05/1993	GGMS MANGAL THANA	A.V.P

TERMS & CONDITIONS.

1. NO-TA/DA etc is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. Appointment is purely on temporary adhoc /contract basis initially for a period of one year.
4. They should not be handed over charge if their age exceeds 35 years or below 18 years.
5. Appointment is subject to the condition that the certificates, Degree /documents must be verified from the concerned authorities by the office of DEO, if any one found producing bogus/ forged/fake Certificates/Degrees will be reported to the law enforcing agencies for further action.
6. Their services are liable to termination on one month's prior notice from either side. In case of resignation without notice their one-month pay/allowances will be forfeited to the Government.
7. Pay will not be drawn until and unless a certificate to this effect is issued by DEO, that their certificates/Degrees are verified.
8. Winter Zone Schools Teachers will take charge with effect from (01-03-2019) while Summer Zone schools take charge after the date of issue of this Order.
9. If any meritorious candidate is deprived of appointment by this order, the appointment order of the lowest candidate in merit shall be withdrawn on acceptance of the appeal and adjustment order will be reviewed accordingly as per merit.
10. They should join their post within 30 days of the issuance of this notification. In case of failure to join their post within 30 days of the issuance of this notification, their appointment will expire automatically and no subsequent appeal etc shall be entertained.

- 11. Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge
- 12. Before handing over charge, they will sign an agreement with the department, otherwise this order will not be valid.
- 13. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 14. Their services will be terminated at any time in case their performance is found unsatisfactory during their contract period. In case of misconduct they will be proceeded under the rules framed from time to time.
- 15. Their appointment is made on (School based), They will have to serve at the place of posting, and their service is (NON-TRANSFERABLE) to any other station/school.
- 16. Posting within five selected schools is the wholly sole authority of the Appointing Authority and no one has the right to claim for a specific school.
- 17. Before handing over charge Principals/Head Mistresses concerned will check their documents; if they have not acquired the required qualifications, they may not be handed over charge.
- 18. Posting within the selected schools is the wholly solely authority of the appointing authority and no one has the right to claim for a specific school.
- 19. Medical Certificate should be signed positively by District Education Officer (F) Buner.
- 20. Errors and omissions will be acceptable within the specified period.
- 21. The selected candidate will be bound to accept the right of deserving candidates whoever omitted wrongly.

(SADIA ILYAS)

DISTRICT EDUCATION OFFICER (F)
DISTRICT BUNER.

Endst: No. 10855-64 / Dated 11/01/2019.

- Copy forwarded for information and necessary action to the:-
- 1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
 - 2. Deputy Commissioner Buner at Daggar.
 - 3. District Nazim Buner.
 - 4. District Monitoring officer Buner.
 - 5. District Accounts Officer Buner.
 - 6. Medical Superintendent DHO Hospital Buner.
 - 7. ADEO (B & AO) Local Office.
 - 8. Principals / Head Mistresses Concerned.
 - 9. Officials Concerned.
 - 10. Master File.

DISTRICT EDUCATION OFFICER (F)
DISTRICT BUNER

چارج رپورٹ

(16)

تصدیق کی جاتی ہے کہ مسمیٰ حی جی ساگر رحیم عبدالرسول خان

ساکن گومارہ تحصیل ٹانگر ضلع بونیر کی تقرری DEO بونیر (مردانہ/زنانہ) کے حکم نامہ
نمبر 10855-64 مورخہ 11-01-2019 کے تحت GGHS, GGHS, GGMS, GGPS

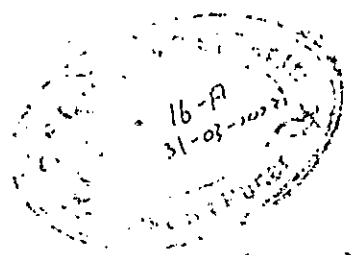
GGMS Langar پر سیریل نمبر 105 کے تحت عمل میں آئی ہے۔ آج
مورخہ 01-03-2019 صبح تھانگر بجے اس نے سکول ہذا میں اپنی

ذیولٹی کا چارج سنبھال لیا اور رپورٹ عرض ہے

District Education Officer (F) ہیڈ ماسٹر
Buner Distt

بخدمت بہتر اہل ڈی ای او جی ایس ای ایل ایس ڈی ای او کس نوٹس

Ameswara (B)



کے نواں = برائے ٹرانسفر

جناب عالیہ؟

ادب سے گزارش کی جاتی ہے کہ میں حسب آہ سالانہ

بگڑے گی ریٹس پر بیٹوں اور لنڈر G.G.M.S میں آ۔

یونٹ پر 2019 سے اپنی ڈیوٹی سبب انجام دے رہی ہوں۔

یہ سکول تھا ہے گھر سے تقریباً 90 کلومیٹر کے فاصلے پر ہے

مجھے باوجود ذرا لچ سے بڑھ چلا ہے کہ G.G.H.S کورہ ناہی ہو کہ

تھا ہے گاؤں سے 40 کلومیٹر کے فاصلے پر ہے میں آ۔ یونٹ

that here is confirmed (BPS) Part (15)

میں نے یہ سب درخواستیں کی ہیں اور انہیں منظور نہیں کیا گیا ہے

میں نے یہ سب درخواستیں کی ہیں اور انہیں منظور نہیں کیا گیا ہے

عزیز صاحبہ سناڑہ



18

OFFICE ORDER

The competent authority is pleased to transfer the following teachers to the schools noted against their names on their own pay & scales with immediate effect in the interest of public service.

Amawar
(c)

S. No.	Name	Design	From	To	Remarks
1	Miss. Salma	CT	GGHSS Panjar	GGMS Amawar	
2	Miss. Salra	CT	GGMS Langar	GGHS Kuzai Nawagai	✓
3	Miss. Saecda Iqbal	DN1	GGMS Toerwasak	GGHS Ilagha	
4	Miss. Amwal	PET	GGMS Nansar	GGMS Shantai Newkabay	

Notes:-


1. No T/A/C/A is allowed.
2. Charge report should be submitted to all concerned.

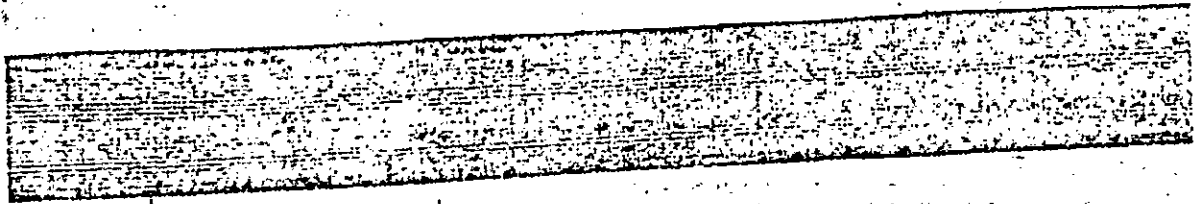
(RUKHSANA RAHIMI)
DISTRICT EDUCATION OFFICER
(FEMALE) HUNTER

Order No. 1976-81 / Dated: 20/11/2022

Copy forwarded for information to:-

1. SA in Director F&S Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner Hunter.
3. District Monitoring Officer (EMA) Hunter.
4. District Accounts Officer Hunter.
5. Principals / Head Mistresses Concerned.
6. Teachers Concerned.
7. Master File.


DISTRICT EDUCATION OFFICER
(FEMALE) HUNTER



(19) 1/12

RELIEVING SLIP

Amme...

(D)

This is to certify that Miss SAIRA CT at GGMS Langar is here by transferred to GGHS kuza
Neerajal Distt; Buner vide DEO (f) order No: 1976-82 Dated 26/12/2022.

She has been relieved this school to day on dated 26/12/2022 BEFORE NOON.

[Signature]
HEAD MISTRESS
GGMS LANGAR

HEAD MISTRESS
GGMS LANGAR

10


...

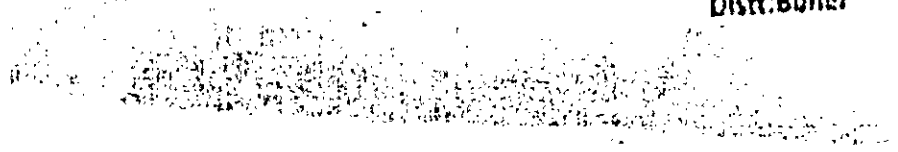
Certified that Miss. Sara CT GHS Kaza Nawaga Dist. Buner transferred from GHS Laspur
to GHS Kaza Nawaga vide DES (P) Buner Order no. 1576/22 Dated 20/11/2022

She took over charge of the post of G. at GHS Kaza Nawaga after expiry of this day
20/11/2022.

HEAD MISTRESS

GHS KAZA NAWAGA


Head Mistress
GHS Kaza Nawaga
Dist. Buner



Dist. Govt. NWFP-Provincial
District Accounts Office Bunair at Dagga
Monthly Salary Statement (January-2023)


21

Anneume

Personal Information of Mr SAIRA BIBI d/w/s of ABDUR RASHID KHAN

Personnel Number: 00920353 CNIC: 1510102069438

Date of Birth: 15.04.1991 Entry into Govt. Service: 01.03.2019

E


Employment Category: Active Temporary

Designation: CERTIFIED TEACHER

80677090-DISTR

DDO Code: (BD6243)-District Bunair

Payroll Section: 001

GPF Section: 001

Cash Center:

GPF A/C No:

Interest Applied: Yes

GPF B:

Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2022

Pay Scale Type

Wage type		Amount		
0001	Basic Pay	31,840.00	1001	House R
1210	Convey Allowance 2005	2,856.00	1300	Medical
1911	Compen Allow 20% (1-15)	1,000.00	2316	Teaching
2341	Dispr. Red All 15% 2022KP	3,017.00	2347	Adhoc R

Deductions - General

Wage type		Amount		
3501	Benevolent Fund	-1,200.00	3534	R. Ben &
3990	Emp. Edu. Fund KPK	-125.00		

Deductions - Loans and Advances

Loan	Description	Principal amount	Dedu
------	-------------	------------------	------

Deductions - Income Tax

Payable: 0.00 Recovered till January-2023: 0.00 Exempted: 0.00

Gross Pay (Rs.): 49,978.00 Deductions: (Rs.): -1,925.00 Net Pay: (R

Payee Name: SAIRA BIBI

Account Number: 4158695399

Bank Details: NATIONAL BANK OF PAKISTAN, 231704 DAGGAR BUNIR DAGGAR BUNIR

Leaves: Opening Balance: Aailed: Earned: B:

(22)

Dist. Govt. NWFP-Provincial
District Accounts Office Bunair at Dagga
Monthly Salary Statement (February-2023)

Information of Mr SAIRA BIBI d/w/s of ABDUR RASHID KHAN

Cell Number: 00920353 CNIC: 1510102069438 NTP
 Birth: 15.04.1991 Entry into Govt. Service: 01.03.2019 Lenj

Employment Category: Active Temporary

Occupation: CERTIFIED TEACHER

80677090-DISTRICT

Code: BD6243-District Buner

Section: 001

GPF Section: 001

Cash Center:

Contract No:

Interest Applied: Yes

GPF Balance

Contract Number: -

Allowances:

Pay scale: BPS For - 2022

Pay Scale Type: Civ

Wage type	Amount	W	
Basic Pay	31,840.00	1001	House Rent A
Convey Allowance 2005	2,856.00	1300	Medical Allo
Compen Allow 20% (1-15)	1,000.00	2316	Teaching Allc
Dispr. Red All 15% 2022KP	3,017.00	2347	Adhoc Rel Al

Deductions - General

Wage type	Amount	W	
Benevolent Fund	-1,200.00	3534	R. Ben & Dea
Imp. Edu. Fund KPK	-125.00		

Loans - Loans and Advances

Description	Principal amount
-------------	------------------

Deductions - Income Tax

0.00 Recovered till February-2023: 0.00 Exempted:

Pay (Rs.): 49,978.00 Deductions: (Rs.): -1,925.00

Name: SAIRA BIBI

Cell Number: 4158695399

23

Dist. Govt. NWFP Provincial
District Accounts Office Bannir at Dugga
Monthly Salary Statement (March-2023)



Personal Information of Mr SAIRA BIBI d/w/o of ABDUR RASHID KHAN

Personnel Number: 00920353 CNIC: 1510102069438 NTN:
Date of Birth: 15.04.1991 Entry into Govt. Service: 01.05.2019 Length of Service: 04 Years 01 Months 00 Days

Employment Category: Active Temporary

Designation: CERTIFIED TEACHER 80677090-DISTRICT GOVERNMENT KHYBE

DDO Code: BD6243-District Buner

Payroll Section: 001 GPF Section: 001 Cash Center:
GPF Ac No: Interest Applied: Yes GPF Balance: 0.00

Vendor Number:

Pay and Allowances: Pay scale: BPS For - 2022 Pay Scale Type: Civil BPS: 15 Pay Stage: 4

Wage type	Amount	Wage type	Amount
0001 Risk Pay	31,840.00	1001 House Rent Allowance 15%	1,524.00
1200 Convey Allowance 2015	2,856.00	1300 Medical Allowance	1,500.00
1911 Compen Allow 20% (1-15)	1,000.00	2316 Teaching Allowance 2021	3,224.00
2341 Despt. Rel At 15% 2022KP	3,017.00	2347 Adhoc Rel At 15% 22(PS17)	3,017.00

Deductions - General

Wage type	Amount	Wage type	Amount
3501 Benevolent Fund	-1,200.00	3534 R. Ben & Death Comp Fresh	-600.00
3990 Emp. Edu. Fund KPK	-135.00		0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
------	-------------	------------------	-----------	---------

Deductions - Income Tax

Payable: 0.00 Recovered till March-2023: 0.00 Exempted: 0.00 Recoverable: 0.00

Gross Pay (Rs.): 39,978.00 Deductions: (Rs.): -1,935.00 Net Pay: (Rs.): 38,043.00

Payee Name: SAIRA BIBI

Account Number: 4158695399

Bank Details: NATIONAL BANK OF PAKISTAN, 231701 DAGGAR BUNIR DAGGAR BUNIR.

Leave: Opening Balance: Availed: Earned: Balance:

Permanent Address:

City: BUNER Domicile: Housing Status: No Official

Temp Address:

City: Email:

Dist. Govt. NWFP-Provincial
District Accounts Office Buner at Dagg
Monthly Salary Statement (April-2023)

24

Personal Information of Mr SAIRA BIBI d/w/o of ABDUR RASHID KHAN

Personnel Number: 00920353 CNIC: 1510102069438 NTN:
 Date of Birth: 15.04.1991 Entry into Govt. Service: 01.03.2019 Length of Service: 04 Yrs

Employment Category: Active Temporary

Designation: CERTIFIED TEACHER 80677090-DISTRICT GOVERNMENT KI

DDO Code: BD6243-District Buner

Payroll Section: 001 GPF Section: 001 Cash Center:

GPF A/C No: Interest Applied: Yes GPF Balance:

Vendor Number: -

Pay and Allowances: Pay scale: BPS For - 2022 Pay Scale Type: Civil BPS: 15

Wage type		Amount	Wage type	
0001	Basic Pay	31,840.00	1001	House Rent Allowance 45%
1210	Convey Allowance 2005	2,856.00	1300	Medical Allowance
1911	Compen Allow 20% (1-15)	1,000.00	2316	Teaching Allowance 2021
2341	Dispr. Red All 15% 2022KP	3,017.00	2347	Adhoc Rel Al 15% 22(PS17)

Deductions - General

Wage type		Amount	Wage type	
3501	Benevolent Fund	-1,200.00	3534	R. Ben & Death Comp Fresh
3990	Emp.Edu. Fund KPK	-135.00		

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction
------	-------------	------------------	-----------

Deductions - Income Tax

Payable: 0.00 Recovered till April-2023: 0.00 Exempted: 0.00 Recovered:

Gross Pay (Rs.): 39,978.00 Deductions: (Rs.): -1,935.00 Net Pay: (Rs.):

Payee Name: SAIRA BIBI

Account Number: 4158695399

Bank Details: NATIONAL BANK OF PAKISTAN, 231704 DAGGAR BUNIR DAGGAR BUNIR.

Leaves: Opening Balance: Availed: Earned: Balance:

Permanent Address:

City: BUNER Domicile: Housing Sta

Temp Address:

City: Email:

25

Dist. Govt. NWFP-Provincial
District Accounts Office Buner al Daggar
Monthly Salary Statement (May-2023)



Personal Information of Mr SAIRA BIHI d/w/o of ABDUR RAHIM KHAN

Personnel Number: 00920353 CNIC: 1510102080436 NTN:
 Date of Birth: 15.04.1991 Entry into Govt. Service: 01.03.2019 Length of Service: 04 Years 03 Months 00

Employment Category: Active Temporary

Designation: CERTIFIED TEACHER 80677090-DISTRICT GOVERNMENT KHYBE

EDCO Code: HD023-District Buner

Payroll Section: 011 GPF Section: 011 Cash Center:
 GPF A/c No: Interest Applied: Yes **GPF Balance: 4,290.00**

Member Number: **Pay and Allowances:** Pay scale: BPS For - 2022 Pay Scale Type: Civil BPS: 15 Pay Stage: 4

Wage type	Amount	Wage type	Amount
0001 Basic Pay	31,840.00	1001 House Rent Allowance 35%	3,524
0210 Convey Allowance 2005	2,856.00	1300 Medical Allowance	1,500
1003 Convey Allow 20% (1-15)	1,000.00	2316 Teaching Allowance 2021	3,274
2841 Dispr. Red All 15% 2022KP	3,017.00	2347 Allow. Rel Al 15% 22(PS 17)	3,017

Deductions - General

Wage type	Amount	Wage type	Amount
0015 GPF Subscription	-4,290.00	3501 Benevolent Fund	-1,200
0500 R. Ben & Death Comp Fresh	-600.00	3900 Emp. Edu. Fund KPK	-135
4200 Professional Tax	-1,200.00		0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

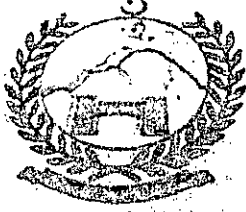
Payable: 0.00 Recovered till May-2023: 0.00 Exempted: 0.00 Recoverable: 0

Gross Pay (Rs.): 49,978.00 Deductions: (Rs.): -7,425.00 Net Pay: (Rs.): 42,553.00

Payee Name: SAIRA BIHI
 Account Number: 4158695390
 Bank Details: NATIONAL BANK OF PAKISTAN, 211704 DAGGAR BUNIR DAGGAR BUNIR.

Leaves: Opening Balance: Availed: Earned: Balance:

Permanent Address:
 City: BUNER Domestic: Housing Status: No Official
 Temp. Address:
 City: Email:



OFFICE OF THE DISTRICT EDUCATION OFFICER (F)
DISTRICT BUNER
PHONE & FAX No. 0939-510366
EMAIL: deofemalebuner@gmail.com

26

NO. 769-79 / DATED 01/04 / 2023

To

Annexure

(F)

1. Neelum CT GGMS Maradu.
2. Sheraz DM GGMS Langar.
3. Sidra Inayat TT GGMS Barkalay.
4. Swada Qaria GGHS Pandir.
5. Kalsoom AT GGMS Maradu.
6. Bibi Haleema CT GGMS Langar.
7. Kalsoom TT GGMS Langar.
8. Bibi Saira CT GGMS Langar. ✓
9. Bushra AT GGMS Langar.
10. Sheema TT GGMS Shangra.
11. Laziza Shah PET GGMS Maradu.
12. Urfat DM GGMS Langar.

Subject: -

EXPLANATION / ABSENT NOTICE

Memo:

It has come into the notice of undersigned that you have not report to your original schools although your transfer order/Corrigendum order has been cancelled vide this Office Endst: No. 2065 dated 26-12-2022. Therefore you are directed to immediately report to your original schools and submit report to the undersigned. In case of non-compliance strict disciplinary action will be taken against you under E & D rules which may lead to your removal from service.

DISTRICT EDUCATION OFFICER (F)
DISTRICT BUNER

Endst: No. & Date Even:

Copy forwarded for information to the:

1. Director E & SED Khyber Pakhtunkhwa Peshawar.
2. Principals / Head Mistresses concerned.

DISTRICT EDUCATION OFFICER (F)
DISTRICT BUNER

OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) DISTRICT HUNER
PHONE & FAX NO. 0999-510166
EMAIL: deefemalehuner@gmail.com



CANCELLATION ORDER

The competent authority is pleased to ~~revoke~~ cancel/withdrawn the Office Orders based regarding transfers of teachers vide this Office Order No. 1680, 1681, 17200, 1935, 1976-82, 2018-24, 2025-31 and 2012-35 dated 26-12-2022 with immediate effect in the best interest of public service.

*Amirine
(G)*

NOTE:

- 1. No TA/DA is allowed.

(RUKHSANA RAHIM)
DISTRICT EDUCATION OFFICER (F)
DISTRICT HUNER

Endst: No. 2065 / Dated 26/12/2022.

Copy forwarded for information and necessary action to the:-

- 1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- 2. District Monitoring Officer (DMA) Huner.
- 3. District Accounts Officer Huner.
- 4. Principals / Head Mistresses concerned to inform teachers concerned to report to their original station.
- 5. All SDEOs Female to inform teachers concerned to report to their original station.
- 6. Teachers Concerned for strict compliance otherwise disciplinary action will initiated against them under I & D Rules 2011.

R. D. Khan
DISTRICT EDUCATION OFFICER (F)
DISTRICT HUNER

محکمہ صحت جناب ڈی ای او صاحب ایڈمنسٹریٹو اینڈ سیکنڈری ایجوکیشن ضلع بونیر

Ammeru
(H)

عنوان: برائے ٹرانسفر

جناب عالیہ!

ادب سے گزارش کی ہے کہ سائلہ (سائزہ بی بی) گورنمنٹ گریجویٹ سکول بونیر

امازی میں بحیثیت CT پوسٹ پر جنوری 2019ء سے خدمات سرانجام دے رہی ہیں۔
سابقہ دور حکومت میں میرا ٹرانسفر گورنمنٹ گریجویٹ سکول بونیر امازی سے گورنمنٹ گریجویٹ سکول بانی سکول کوزہ ناوہ کی کو ہوئی تھی۔

سینئر بر قسمی سے برنا زمانہ کرپٹ ڈی ای او فیصل بونیر (ضلع بونیر) سے
بے اسٹور رقم زد ہونے کی یادداشت میں میرا قانونی آئینی آرڈر جو کہ ٹرانسفر
سکول کوزہ ناوہ کی میں ہو گیا ہے، کو اینسل (Withdrawal) کی گئی۔

اب جبکہ 13-05-2023 کو سب سے ڈی ای او فیصل ایڈمنسٹریٹو اینڈ سیکنڈری ایجوکیشن
ایجوکیشن بونیر نے ٹرانسفر آرڈر CT سائزہ جاری کی ہیں جس میں اس میں
بہتر 1021 پر میں رالی بند ہے CT کی ٹرانسفر (GHS) چھٹی سے 55 (GHS)
کوزہ ناوہ کی کوئی ٹی پی میں سائلہ (سائزہ بی بی) CT گورنمنٹ گریجویٹ سکول بانی
سکول کوزہ ناوہ کی BID سے تین ماہ کی تنخواہیں وصول کی ہیں اور اس میں بھی
تنخواہ GHS کوزہ ناوہ کی میں فعال (Active) ہے۔
لہذا مفردہ بالا قانونی شواہد کو مد نظر رکھتے ہوئے میری CT ٹرانسفر کو
بحال اور Maintain رکھا جائے تا اب وہاں کو ایس کی

عہدہ سائزہ بی بی راجہ بونیر 03479396764

CT # BPS 45
GGS Langar Amazi

دستخط درحوتتہ سائزہ

Date: 15-05-2023

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(29)

امامزویں ہون چھینے سی ای سی لوہیہ ہر 2019 سے ہر ڈرائی
 ہر ایچ ایم کے رہیں ہوں
 یہ سکول ہمارے گھر سے تقریباً 60 کلومیٹر کے فاصلے پر
 واقع ہے جسے پانچ ماہوں کے دوران میں نے علاقے کو ریل کے گزر سکول
 سکول کے لیے تقریباً 5 لاکھ روپے خرچ کیے ہیں اور ہمارے گاؤں کے
 3 کلومیٹر کے فاصلے پر ہے جس میں سی سی ٹی وی کمرے شامل ہے

اب ہمارے گھر میں یہ سکول کے لیے تقریباً 60 کلومیٹر کے فاصلے پر
 سکول سکول کے لیے تقریباً 5 لاکھ روپے خرچ کیے ہیں اور ہمارے گاؤں کے
 3 کلومیٹر کے فاصلے پر ہے جس میں سی سی ٹی وی کمرے شامل ہے

3479376769

CT-08/PS-1115
 GAMS Langar Amazi

At

Date: 15.05.2023

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BEFORE THE PESHAWAR HIGH COURT MINGORA
BENCH / DARUL QAZA SWAT

W.P. No. _____ of 2023

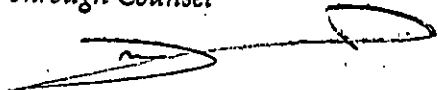
Mst. Bibi Saira VERSUS Govt. of K.P.K & others..

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PETITIONER

Through Counsel


MUHAMMAD JAVAID KHAN

Advocate, Supreme Court of Pakistan

Office: Near Allah-u-Akbar Masjid, College

Colony Saidu Shrif Swat.

(31)

BEFORE THE PESHAWAR HIGH COURT MINGORA
BENCH/DARUL QAZA SWAT

W.P No. _____ of 2023

Mst. Bibi Saira D/o Abdul Rashid Khan R/o Bagra Tehsil Daggar
District Buner.(Petitioner)

VERSUS

1. Government of Khybar Pakhtunkhwa through Secretary Elementary and Secondary Education at Civil Secretariat Peshawar.
2. Director Elementary and Secondary Education Khybar Pakhtunkhwa at Peshawar.
3. District Education Officer (Female) District Buner at Dggar.
.....(Respondents)

WRIT PETITION UNDER ARTICLE 199 OF THE
CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN
1973.

Respectfully Sheweth:

1. That the petitioner was appointed as certified Teacher (C.T) at Government Girls Middle School Langar Tehsil Mandanr District Buner vide order No.10855-64 dated 11/01/2019. (Copy of order is attached as annexure A).
2. That after performing her duties for more than three years at the said station, the petitioner applied for transfer to Govt. Girls High School Koza Nawagai, which is at the distance of 40 KM, from the home village of the petitioner, vide application dated 31/3/2022. Contents of the said application may be considered as integral part of this writ petition. It is pertinent to mentioned that GGMS Langar is at a distance 90 K.M from the home village of the petitioner. (Copy of application dated 31/3/2022 is attached as annexure B).

90 KM
25/7/22

- 32
3. That the respondent No.3 then issued a transfer order No.1976-82 dated 26/12/2022 and the petitioner was transferred from G.G.M.S Langar to G.G.H.S Koza Nawagai. (Copy of transfer order No.1976-82 dated 26/12/2022 is attached as annexure C).
 4. That in continuation of the said transfer order the petitioner relinquished the charge of C.T at G.G.M.S Langar on 26/12/2022 before Noon. (Copy of the charge relinquished certificate is attached as annexure D).
 5. That the petitioner then took the charge of C.T at G.G.H.S Koza Nawagai on 26/12/2022 after Noon.
 6. That the petitioner then performed her duty at G.G.H.S.S Koza Nawagai as C.T Teacher regularly and received her salary accordingly. (Copy of pay slip is attached as annexure E).
 7. That now all of a sudden the respondent No.3 has issued an explanation letter to the petitioner No. 769-79 dated 01/4/2023, whereby it was stated that the transfer order of the petitioner dated 26/12/2022 was canceled on the same day vide End. No. 2065 dated 26/12/2022. (Copies of explanation letter No. 769-79 dated 01/4/2023 and cancellation letter End. No. 2065 dated 26/12/2022 are attached as annexure F&G).
 8. That the petitioner, responding to the said explanation letter submitted two applications dated 15/5/2023 to respondent No.3 for her redressal. (Copies of applications dated 15/5/2023 are attached as annexure H).
 9. That the respondent No.3 is not taking any action in respect of the prayers of the petitioner in the said two applications dated 15/5/2023, hence the petitioner having no other adequate efficacious and prompt remedy except to knock at the doors of this constitutional court, inter alia on the following

GROUND:

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- i. That the action and inaction of the respondents towards the grievance of the petitioner, is illegal and unlawful, unconstitutional.
- ii. That the action and inaction of respondents is violation of Article 4, 8, 25, 38 (e) of the constitution of Islamic Republic of Pakistan 1973.
- iii. That the cancellation order No. 2065 dated 26/12/2022 is illegal unlawful and unconstitutional.
- iv. That the cancellation order No. 2065 dated 26/12/2022 is illegal unlawful and unconstitutional, for the reasons that two other teachers namely Halima C.T BPS-15 and Kalsoom Bibi T.T BPS-15 have been transferred from the said School GGMS Langar to GGMS Elai and GGMS Bampokha respectively vide order No.1781-86 dated 03/6/2023 and notification 1948-53 dated 13/6/2023. (Copies of the orders are attached as annexure I).
- v. That similarly the notification No. 1205-11 dated 13/5/2023 vide which Rani Andalip C.T has been transferred from GGHSS Chinglai to GGHS. Koza Nawagai, is illegal and discriminatory for the reasons that the said Teacher belongs to Bara Nawagai which is near to Chinglai as compeer to the posting place of the petitioner.
- vi. That some other grounds will be taken at the time of arguments with the prior permission of this Honourable Court.

It is therefore, humbly prayed that on acceptance of this writ petition the cancellation order No.2065- dated 26/12/2022 may be declare illegal, unlawful and unconstitutional and the original transfer order of the ptitioner No. 1976-82 daetd 26/12/2022 may be restored.

Or

In the alternative respondents may be directed to the adjust the petitioner against the vacant post of C.T at G.G.M.S Dhand Maira Tehsil Mandanr District Buner.

Any other remedy which has not specifically been prayed for and to which the petitioner is entitled may also be granted in favour of petitioner.

PETITIONER

Through Counsel



MUHAMMAD JAVAID KHAN

Advocate, Supreme Court of Pakistan

Interim Relief:

By way of interim relief the cancelation order No.2065- dated 26/12/2022 may be suspended till the decision of the above-titled writ petition. Or in the alternative the vacant post of C.T at G.G.M.S Dhand Maira Tehsil Mandanr District Buner may be kept vacant till the final disposal of the instant writ petition.

PETITIONER

Through Counsel



MUHAMMAD JAVAID KHAN

Advocate, Supreme Court of Pakistan

(25)

BEFORE THE PESHAWAR HIGH COURT MINGORA
BENCH / DARUL QAZA SWAT

W.P. No. _____ of 2023


Mst. Bibi Saira VERSUS Govt. of K.P.K & others.

CERTIFICATE:

It is, certified that no such like Writ petition has earlier been filed before Honourable court, or any other competent court.

PETITIONER

Through Counsel


MUHAMMAD JAVAID KHAN
Advocate, Supreme Court of Pakistan

Law books:

1. Constitution of the Islamic Republic of Pakistan.
2. Law books as per need.

BEFORE THE PESHAWAR HIGH COURT MINGORA

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BENCH/DARUL QAZA SWAT

W.P. No. _____ of 2023

Mst. Bibi Saira

VERSUS

Govt. of K.P.K. & others.

AFFIDAVIT

I, Mr. Inayat Ullah S/o Ihsan Ullah R/o Faiz Abad Tehsil Mandanr District Buner, do hereby state on oath that the contents of this writ petition are true and correct to the best of my knowledge and belief.

DEPONENT

Petitioner through special attorney

Mr. Inayat Ullah

BEFORE THE PESHAWAR HIGH COURT MINGORA

BENCH / DARUL QAZA SWAT

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W.P. No. _____ of 2023

Mst. Bibi Saira VERSUS Govt. of K.P.K & others.

MEMO OF ADDRESSES

ADDRESS OF THE PETITIONER:

*Petitioner through special attorney Mr. Inayat Ullah S/o. Ihsan
Ullah R/o Faiz Abad Tehsil Mandanr District Buner.*

CNIC No. 15101-4293186-7

Cell No. 03479001304

ADDRESSE OF THE RESPONDENTS:

1. Government of Khybar Pakhtunkhwa through Secretary Elementary and Secondary Education at Civil Secretariat Peshawar.
2. Director Elementary and Secondary Education Khybar Pakhtunkhwa at Peshawar.
3. District Education Officer (Female) District Buner at Dggar.

PETITIONER

Through Counsel


MUHAMMAD JAVAID KHAN

Advocate, Supreme Court of Pakistan

PESHAWAR HIGH COURT, MINGORA BENCH
(DAR-UL-QAZA), SWAT

FORM OF ORDER SHEET

Annexure
(j)

Court of

Case No..... of.....

Serial No. of order of proceeding	Date of Order or Proceedings	Order or other Proceedings with Signature of Judge and that of parties or counsel where necessary.
1	2	3
	13.09.2023	<p><u>W.P No.904-M/2023 with Interim Relief</u></p> <p><u>(Mst. Bibi Saira Vs. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education at Civil Secretariat Peshawar and others)</u></p> <p>Present: <u>Muhammad Javaid Khan, Advocate for petitioner.</u></p> <p><u>Ms. Mehnaz, A.A.G for official Respondents.</u></p> <p>***</p> <p><u>MUHAMMAD NAEEM ANWAR, J.-</u> Through instant petition filed under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973, Mst. Bibi Saira, who is serving as Certified Teacher (BPS-15) has challenged order of respondent No.3 bearing No.2065 dated 26.12.2022 whereby her transfer order bearing No.1976-82 from GGMS Langar to GGHS Kuza Nawagai, District Buner has been cancelled/withdrawn.</p> <p>2. Learned counsel for petitioner contended that the petitioner the petitioner remained posted at GGMS Langar for more than three years and thereafter, she was transferred to GGHS Kuza Nawagai, but her transfer order was cancelled/ withdrawn in a short span through impugned order against which the petitioner filed two applications before the respondents No.3 for review of the impugned order but no action has yet been taken by her, hence, she having got</p>

no other alternate, efficacious and appropriate remedy has filed the instant constitutional petition before this Court.

3. The learned A.A.G, while supporting the impugned order, contended that transfer order of the petitioner was cancelled/ withdrawn on same day i.e., 26.12.2022 and even otherwise, under Article 212 of the Constitution only the Services Tribunal has jurisdiction to resolve the controversy regarding transfer and posting of the civil servants, which falls within the terms and conditions of their service, as such, the instant petition is not maintainable before this Court.

4. Arguments heard and record perused.

5. Undeniably, petitioner is a civil servant and was posted as C.T at GGMS Langar, wherefrom she was transferred and posted to GGHS Kuza Nawagai but through impugned order dated 26.12.2022 her transferred order was cancelled/ withdrawn by respondent No.3. Article 212 of the Constitution of Islamic Republic of Pakistan, 1973 deals with administrative Courts and Tribunals and its sub-article (a) pertains to the matters relating to the terms and conditions of the persons who are or have been in service of Pakistan including the disciplinary matters, are exclusively to be tried by the Tribunal. Sub-Article 3 of Article 212 *ibid* has categorically provided an appeal to the Hon'ble Supreme Court from the judgment, order, decree or sentence of an Administrative Court or Tribunal. When questioned, learned counsel for the petitioner contended the impugned withdrawal order of her transfer is patently illegal, unlawful, without

lawful authority, of no legal effect but in support of his submission, he could not produce any precedent for entertaining instant petition before this Court for the relief. The question of posting of a government servant squarely falls within the jurisdiction/domain of the competent authority. According to Khyber Pakhtunkhwa Civil Servant Act, 1973 every civil servant under the provincial government is liable to serve within the province. It would be relevant to reproduced the Section 10 of the Act, 1973 as under:

"10. Posting and Transfer.

Every civil servant shall be liable to serve anywhere within or outside the province in any post under the Federal Government, or any Provincial Government or local authority, or a corporation or body setup or established by any such Government:

Provided that nothing contained in this section shall apply to a civil servant recruited specifically to serve in a particular area or region:

Provided further, that where a civil servant is required to serve in a post outside his service or cadre, his terms and conditions of service as to his pay shall not be less favourable than those to which he would have been entitled if he had not been so required to serve."

6. More-so, in the matter of posting/transfer of civil servant the Hon'ble Supreme Court of Pakistan has settled the principle in the case of "Syed Muhammad Naqvi and others v. Federation of Pakistan (PLD 2013 SC 195) and any such matter shall fall within the domain of Tribunal. Under Article 189 of the Constitution of Islamic Republic of Pakistan, 1973 any decision of the Supreme Court to the extent of law is binding on all the High Courts and

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Subordinate Courts. Similarly, the decision of the Hon'ble Supreme Court of Pakistan is binding on all the government functionaries, whether the parties or not.

7. It is the domain of the authority or administration to post and transfer any civil servant anywhere during his service and the appointment, posting and transfer of a civil servant relate to the terms and condition of service are purely administrative matters, however, for settlement of those matters a forum has been provided by the law and presently Tribunal is functioning. This Court in the case of "Naheed Jan vs. Additional Chief Secretary, (Fata) Secretariat, Khyber Pakhtunkhwa, Peshawar and 2 others [2013 PLC(CS) 153]

has held that:

"Since posting and transfer is one of the terms and conditions of civil servant as defined in Chapter-II section 10 of Civil Servants Act, 1973, therefore, this Court lacks the jurisdiction to entertain the writ petition challenging the transfer/posting order."

It is the basic principle of law that when the law requires that a particular thing is to be done in a particular manner, it must be done in that manner and not otherwise. Reliance may be placed on the case of "Ajmir Shahi, Ex-Sepoy vs. the Inspector General, Frontier Corps Khyber Pakhtunkhwa and another" (2020 SCMR 2129). In such an eventuality, this Court cannot assume the jurisdiction, which has specifically been barred by the Constitution of Islamic Republic of Pakistan, 1973. The principle laid down by the apex Court in judgment dated 04.04.2023 rendered in C.P No.2467 of 2020 titled "Abid Jan Vs. Ministry of Defence through its Secretary Islamabad

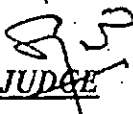
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and others" being distinguishable cannot be applied to the instant petition.

8. Thus, without discussing the nature of the impugned order as to whether it has been passed in public interest or otherwise, instant petition is hereby dismissed in limine being not maintainable, leaving the petitioner at liberty to approach to the appropriate forum, if so desired.

Announced
13.09.2023


JUDGE


JUDGE

Subz Ali* (D.D)

HON'BLE MR. JUSTICE MUHAMMAD SAHEM ANWAR
HON'BLE MR. JUSTICE SHAHID KHAN

office
16/9/2023



NOTIFICATION:

Consequent upon the recommendation of the transfer committee issued vide this office Endst: No. 1712 dated: 30/05/2023, the competent authority is pleased to Transfer Miss: Haleema CT BPS-15 from GGMS Langar to GGMS Elai against the vacant post of CT on her own pay & scale with immediate effect in the interest of public service.

Notes:-

1. No TADA is allowed.
2. Charge report should be submitted to all concerned.

Endst: No. 1781-861 Dated: 03/06/2023.

Copy forwarded for information to:-

1. Director E&SE Khyber PakhtunKhwa Peshawar.
2. District Monitoring Officer (EMA) Buner.
3. District Accounts Officer Buner.
4. B&AO Local Office.
5. Teacher Concerned.
6. Master File.

(DR. SHAMIM AKHTAR)
DISTRICT EDUCATION OFFICER
(FEMALE) BUNER

DISTRICT EDUCATION OFFICER
(FEMALE) BUNER



OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) DISTRICT BUNER
PHONE & FAX NO. 0939-510366
EMAIL: deofemalebuner@gmail.com



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NOTIFICATION:

Consequent upon the recommendation of the transfer committee issued vide this office Endst: No. 1212 dated: 13-05-2023, the competent authority is pleased to Transfer Miss: Kulsoom Bibi TT BPS-15 from GGMS Langar to GGMS Bampokha against the vacant post of TT on her own pay & scale with immediate effect in the interest of public service.

Notes:-

1. No TADA is allowed.
2. Charge report should be submitted to all concerned.

(DR: SHAMIM AKHTAR)
DISTRICT EDUCATION OFFICER
(FEMALE) BUNER

Endst: No. 1948-531 Dated: 13-06 /2023.

Copy forwarded for information to:-

1. Director E&SE Khyber Pakhtunkhwa Peshawar.
2. District Monitoring Officer (EMA) Buner.
3. District Accounts Officer Buner.
4. B&AO Local Office.
5. Head Mistress / Incharge Concerned.
6. Teacher Concerned.
7. Master File.

DISTRICT EDUCATION OFFICER
(FEMALE) BUNER

Sofab



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

No.SO(SM)E&SED/7-1/2019/Posting/Transfer/Policy of TC
Dated Peshawar the September 11, 2019

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Annexure
(2)

To

1. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. The Director, Curriculum and Teachers Education Khyber Pakhtunkhwa/Abbottabad.
3. The Director, Provincial Institutes of Teachers Education, Peshawar.
4. The Director, Education Sector Reforms Unit, Elementary & Secondary Education Department, Khyber Pakhtunkhwa.
5. All District Education Officers (Male & Female) in Khyber Pakhtunkhwa.

Subject:- E-TRANSFER POLICY OF TEACHING CADRE IN E&SE DEPARTMENT
KHYBER PAKHTUNKHWA

I am directed to refer to the subject noted above and to state that the Provincial Government has been pleased to implement the subject policy for posting/transfer of Teaching Cadre officers/officials in the Elementary and Secondary Education Khyber Pakhtunkhwa: -

- i. The introduction of e-Transfer for Teaching Cadre policy supersede all previous Posting/Transfer policies in the E&SE Department.
- ii. Transfer on Complaint (Administrative Ground Transfer), Mutual, Inter District Transfer and transfer for Operationalization of Newly Established schools will be exempted from the present policy.
- iii. Transfers shall be made annually in the month of March of the academic year.
- iv. Transfer shall be made only against the vacant post.
- v. The posts filled through NTS, on school based recruitment process shall be declared non-transferable.
- vi. The vacant positions will be uploaded by the District Education Officers for all teaching cadres in last week of February.
- vii. The desirous employees shall apply through e-Transfer Application.
- viii. Each Competent Authority shall constitute a Grievance Redressal Cell headed by a BPS-18 or above officer which will resolve the grievances and determine the merit position of the applicants within a week positively.
- ix. Each Competent Authority shall visit the Dash Board of e-Transfer app. check and verify all the particulars of the applicants till 25th of March.
- x. At the end of March Transfer orders generated by e-Transfer App will be issued.

[Handwritten signature]
11/09/2019



**GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT**

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1. Minimum tenure of 3 years on the present post at a school in plain area while 1.5 years in hard area is must for eligibility of e-posting/transfer.
2. The indicators as per from (A, B, C & D) will be considered for posting/transfer as per detail given below:

Form-A: Posting/Transfer of Teachers up to BPS 16 except SST (Total marks 80)

1. Distance of present school to the desired school (in KM) – 20 marks
 - a. Within 5 KM – 0 marks
 - b. Within 10 KM – 5 marks
 - c. Within 15 KM – 10 marks
 - d. Within 20 KM – 15 marks
 - e. Greater than 20 KM – 20 marks
2. Hard Area - 10 marks
 - a. Normal tenure (within 1.5 years) – 0 marks
 - b. Tenure at hard area (from 1.5 to 3 years) – 4 marks
 - c. Tenure at hard area (from 3 to 5 years) – 7 marks
 - d. Tenure at hard area (more than 5 years) – 10 marks
3. STR (Total number of Students in the school / Total number of Teachers) – 10 marks (IMU data Source)
 - a. STR at present school is greater than the Desired school - 0 marks
 - b. STR at present and the desired school are equal or at the same level - 5 marks
 - c. STR at the present school is less than desired school – 10 marks
4. Chronic Disease – 10 marks
10 marks will only be awarded for chronic diseases (as per notified chronic diseases). A certificate in this regard will be required from Standing Medical Board.
5. Disability – 10 marks
10 marks will only be awarded only to those with Physical Disability. Proof required will be Special person CNIC + Standing Medical Board disability certificate
6. Domicile -10 marks
10 marks will be awarded to those when the desired school is in his/her district of domicile
7. Spouse – 10 marks
10 marks will be awarded to those whose spouse is posted in the district where the desired school is situated and the desired district is the domiciled district of the applicant.

S. H. J. 11/09/2023

Form-B: Posting/Transfers of SSTs (Total Marks – 100)

1. Distance of present school to the desired school (in KM) – 20 marks
 - a. Within 5 KM – 0 marks
 - b. Within 10 KM – 5 marks
 - c. Within 15 KM – 10 marks
 - d. Within 20 KM – 15 marks
 - e. Greater than 20 KM – 20 marks
2. Hard Area - 10 marks



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

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- a. Normal tenure (within 1.5 years) – 0 marks
- b. Tenure at hard area (from 1.5 to 3 years) – 4 marks
- c. Tenure at hard area (from 3 to 5 years) – 7 marks
- d. Tenure at hard area (more than 5 years) – 10 marks
3. STR (Total Number of Students in Class 9 & 10 / Number of SST) - 10 marks (IMU data Source)
 - a. STR at present school is greater than the Desired school - 0 marks
 - b. STR at present and the desired school are equal or at the same level – 5 marks
 - c. STR at the present school is less than desired school – 10 marks
4. Chronic Disease – 10 marks
10 marks will only be awarded for chronic diseases (as per notified chronic diseases).
A certificate in this regard will be required from Standing Medical Board.
5. Disability – 10 marks
6. 10 marks will only be awarded only to those with Physical Disability. Proof required will be Special person CNIC + Standing Medical Board disability certificate
7. Domicile -10 marks
10 marks will be awarded to those when the desired school is in his/her district of domicile
8. Spouse – 10 marks
10 marks will be awarded to those whose spouse is posted in the district where the desired school is situated and the desired district is the domiciled district of the applicant.
9. Annual SSC Result (of the subjects taught by the teacher) working in High/Higher Secondary Schools – 20 Marks
 - a. 90% or above – 20 marks
 - b. 80% to 90% - 15 marks
 - c. 70% to 80% - 10 marks
 - d. 60% to 70% - 5 marks
 - e. Below 60% - 0 marks.

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11/10/2019

OR

- For SSTs (General) working in Middle/Primary Schools – 20 Marks
Overall Students Attendance Rate Percentage as per IMU data
- a. 90% or above – 20 marks
 - b. 80% to 90% - 15 marks
 - c. 70% to 80% - 10 marks
 - d. 60% to 70% - 5 marks
 - e. Below 60% - 0 marks.

Form-C Posting/Transfers of Subject Specialists (SSS/SS) (Total Marks – 100)

1. Distance of present school to the desired school (in KM) – 20 marks
 - a. Within 5 KM – 0 marks
 - b. Within 10 KM – 5 marks
 - c. Within 15 KM – 10 marks
 - d. Within 20 KM – 15 marks



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**GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT**

- c. Greater than 20 KM – 20 marks
2. Hard Area - 10 marks
 - a. Normal tenure (within 1.5 years) – 0 marks
 - b. Tenure at hard area (from 1.5 to 3 years) – 4 marks
 - c. Tenure at hard area (from 3 to 5 years) – 7 marks
 - d. Tenure at hard area (more than 5 years) – 10 marks
3. Number of Students in Class-11 & 12 in the relevant subject - 10 marks
 - a. Number of Students at present school is greater than the Desired school - 0 marks
 - b. Number of Students at present and the desired school are equal or at the same level – 5 marks
 - c. Number of Students at the present school is less than desired school – 10 marks
4. Chronic Disease – 10 marks
10 marks will only be awarded for chronic diseases (as per notified chronic diseases). A certificate in this regard will be required from Standing Medical Board.
5. Disability – 10 marks
10 marks will only be awarded only to those with Physical Disability. Proof required will be Special person CNIC + Standing Medical Board disability certificate
7. Domicile -10 marks
10 marks will be awarded to those when the desired school is in his/her district of domicile
8. Spouse – 10 marks
10 marks will be awarded to those whose spouse is posted in the district where the desired school is situated and the desired district is the domiciled district of the applicant.
9. Annual HSSC Result (of the subjects taught by the teacher) – 20 Marks
 - a. 90% or above – 20 marks
 - b. 80% to 90% - 15 marks
 - c. 70% to 80% - 10 marks
 - d. 60% to 70% - 5 marks
 - e. Below 60% - 0 marks.

S. J. Khan
11/09/2019

Form-D: Posting/Transfers of Principals/Head Masters of High/Higher Secondary Schools (Total Marks – 120)

1. Distance of present school to the desired school (in KM) – 20 marks
 - a. Within 5 KM – 0 marks
 - b. Within 10 KM – 5 marks
 - c. Within 15 KM – 10 marks
 - d. Within 20 KM – 15 marks
 - e. Greater than 20 KM – 20 marks
2. Hard Area - 10 marks
 - a. Normal tenure (within 1.5 years) – 0 marks
 - b. Tenure at hard area (from 1.5 to 3 years) – 4 marks
 - c. Tenure at hard area (from 3 to 5 years) – 7 marks
 - d. Tenure at hard area (more than 5 years) – 10 marks



**GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT**

3. STR (Total number of Students in the school / Total number of Teachers) - 10 marks (IMU data Source)
- STR at present school is greater than the Desired school - 0 marks
 - STR at present and the desired school are equal or at the same level - 5 marks
 - STR at the present school is less than desired school - 10 marks
4. Chronic Disease - 10 marks
10 marks will only be awarded for chronic diseases (as per notified chronic diseases). A certificate in this regard will be required from Standing Medical Board.
5. Disability - 10 marks
6. 10 marks will only be awarded only to those with Physical Disability. Proof required will be Special person CNIC + Standing Medical Board disability certificate
7. Domicile - 10 marks
10 marks will be awarded to those when the desired school is in his/her district of domicile
8. Spouse - 10 marks
10 marks will be awarded to those whose spouse is posted in the district where the desired school is situated and the desired district is the domiciled district of the applicant.
9. Annual SSC & HSSC Result of the School - 20 Marks
- 90% or above - 20 marks
 - 80% to 90% - 15 marks
 - 70% to 80% - 10 marks
 - 60% to 70% - 5 marks
 - Below 60% - 0 marks.
10. Overall Students Attendance Rate Percentage as IMU data - 20 Marks
- 90% or above - 20 marks
 - 80% to 90% - 15 marks
 - 70% to 80% - 10 marks
 - 60% to 70% - 5 marks
 - Below 60% - 0 marks.

S. Rafiq
4/10/2023
(SHAHID RAFIQ)
SECTION OFFICER (SCHOOLS MALE)

Endst: Even No. & Date:

Copy of the above is forwarded to the:-

- PSO to Chief Minister Khyber Pakhtunkhwa Peshawar.
- Secretary to Government of Khyber Pakhtunkhwa Establishment Department, Peshawar.
- Deputy Secretary, (Estab), Establishment Department Government of Khyber Pakhtunkhwa, Peshawar.
- All Section Officers, Elementary & Secondary Education Department Khyber Pakhtunkhwa Peshawar.
- PS to Chief Secretary, Khyber Pakhtunkhwa, Peshawar.

Page 5 of 6

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**GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT**

6. PS to Secretary, Elementary & Secondary Education Department Khyber Pakhtunkhwa Peshawar.
7. PA to Additional Secretary, Elementary & Secondary Education Department Khyber Pakhtunkhwa Peshawar.
8. PA to Chief Planning Officer, Elementary & Secondary Education Department Khyber Pakhtunkhwa.
9. PAs to Deputy Secretary Admn/ Legal, Elementary & Secondary Education Department Khyber Pakhtunkhwa Peshawar.
10. Office Record.

S. A. Khan
11/07/2019
SECTION OFFICER (SCHOOLS MALE)

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Annexure
(M)

NO.SOR-II (E&AD) I-1/85(VOL-II)
Dated Peshawar the 15th February 2003.

Subject: POSTING /TRANSFER POLICY OF THE PROVINCIAL GOVERNMENT.

I am directed to refer to the subject noted above and to say that in supersession of all policy instructions issued in this behalf, the competent authority has approved the following posting Transfer Policy.

- i. All the postings /transfers shall be strictly in public interest and shall not be abused misused to victimize the Government servants.
- 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.
- iii. All contract Government employees, appointed against specific posts, cannot be posted against any other post.
- iv. The normal tenure of posting shall be three years subject to the condition that for the officers /officials posted in unattractive areas, the tenure shall be two years and for hard areas the tenure shall be one year. The unattractive and hard areas will be notified by the Government.
- v. Months of March and July are fixed for posting /transfer of the officers /officials excluding the officers in B-19 and above in the Province. Posting /transfer in Education and Health Departments shall be made in March while the remaining Departments shall make posting /transfers in July. There shall be a ban on posting/transfers throughout the year excluding the aforesaid two months. However, there shall be no restriction in cases where posting /transfer of Government employees become inevitable in other months due to promotion /retirement /creation of new posts/return from long leave/involvement in

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disciplinary proceedings and adjustment of surplus staff for which specific relaxation shall be obtained from the Chief Minister.

- vi. While making postings transfers from settled areas to FATA and vice versa specific approval of the Governor, NWFP needs to be obtained.
- vii. Officers may be posted on executive /administrative posts in the Districts of their domicile except District Coordination Officers (D.C.Os) and Superintendent of Police (SP). Similarly Deputy Superintendent of Police (DSP) shall not be posted at a place where the Police Station (Thana) of his area /resident is situated.
- viii. No postings /transfers of the officers/officials on detailment basis shall be made.
- ix. Regarding the posting of husband /wife, both in Provincial services, efforts where possible would be made to post such persons at one station and this will be subject to the public interest.
- x. All the posting /transferring authorities may facilitate the postings /transfers of the unmarried female Government Servants at the station of the residence of their parents.
- xi. Officers /officials except DCOs and SPs who are due to retire within one year may be posted on their option, on posts in the Districts of their domicile and be allowed to serve their till the retirement.
- xii. In terms of Rules-17 (1) and (2) read Schedule-III of the Government of NWFP. Rules of Business 1985, transfer of officers shown in column 1 of the following table shall be made by the authorities shown against.

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Outside the Secretariat

i. Officers of the all Pakistan Unified Group i.e DMG, PSP including Provincial Police Officers in BPS-18 and above.

ii. Other officers in BPS-17 and above to be posted against schedule posts, or posts normally held by the APUG, PCS (EG) and PCS (SG).

iii. Head of Attached Departments and other Officers in B-19 & above in all Departments.

In the Secretariat:

iv. Secretaries .

v. Other Officers of and above the rank of Section Officers:-

- a. Within the Same Department.
- b. Within the Secretariat from one Department to another.

vi. Officials upto the rank of Superintendent:-

- a. Within the same Department.
- b. To and from an Attached Department.

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Chief Secretary in consultation with the Establishment Department and the Department concerned with the approval of the Chief Minister.

--do--

--do--

Chief Secretary with the approval of Chief Minister.

Secretary of the Department concerned .
Chief Secretary /Secretary Establishment.

Secretary of the Department concerned.
Secretary of the Department in consultation

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c. Within the Secretariat from one Department to another.

with Head of Attached Department concerned. Secretary (Establishment)

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- xiii. While considering postings /transfers proposals all the concerned authorities shall keep in mind the following:
- a. To ensure the posting of proper persons on proper posts, the annual confidential reports, past and present record of service, performance on post held presently and in the past and general reputation with focus on the integrity of the concerned officers/officials be considered.
 - b. Tenure on present post shall also be taken into consideration and the posting transfers shall be in the best public interest.
- ix) Governments servants including District Govt. employees feeling aggrieved due to the orders of posting/transfers authorities may seek remedy from the next higher authority/the appointing authority) as the case may be through an appeal to be submitted within seven days of the receipt of such orders. Such appeal shall be disposed of within fifteen days. The option of appeal against posting /transfer orders could be exercised only in the following cases:-
- i) pre-mature posting/transfer or posting/transfer in violation of the provisions of this policy.
 - ii) Serious and grave personal (humanitarian) grounds.

To streamline the postings /transfers in the District Government and to remove any irritant/confusions in this regard the provision of Rule 25 of the North- West Frontier Province District Government Rules of Business 2001 read with schedule -IV thereof is referred. As per schedule -IV the posting/transferring authorities for the officers /officials against each are as under :-

S.No	Officers	Authority
1.	Posting of District Coordination Officer and Executive District Officer in a District.	Provincial Government
2.	Posting of District Police Officer.	Provincial Government.
3.	Other Officer in BPS-17 and above posted in the District.	Provincial Government .

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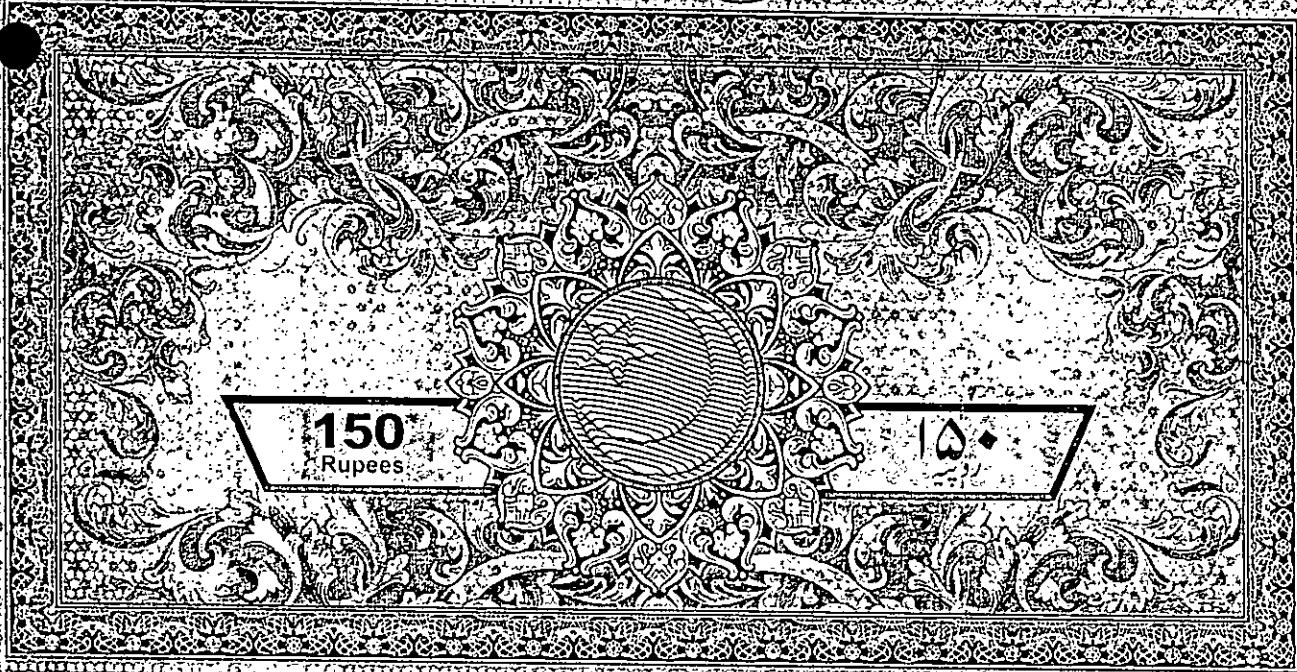
4.	Official in BPS-16 and below.	Executive District Officer in consultation with District Coordination Officer.
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As per Rule 25(2) of the Rules above the District Coordination Department shall consult the Government if it is proposed to :

a. transfer the holder of a tenure post before the completion of his tenure or extend the period of his tenure; and

b. require an officer to hold charge of more than one post for a period exceeding two months.

4. I am directed further to request that that above noted policy may be strictly observed implemented.



بابت مقدم مذکور سرفہر مالکی امور کرنے، کاروان
کرنے، سہیہ کا فٹنہ بھی کو اختیار حاصل ہو
فتاویٰ عالی کے تحت کاروان سندھ

ARTAKHAN
Distt: Courts Duggar Buner
No. 150

اللہ St Qulab
سہیہ سائبر دختہ
نمائندہ اللہ علیہ صلحان اللہ
راختیار بندہ
مدیر سندھ کن - اختیار بندہ
NIC: 15101-6293186-7 NIC: 15101-0206993-8

اللہ St Qulab
صلحان اللہ علیہ صلحان اللہ
تن منہ آبار حلیمہ بونیر
اللہ St Qulab
صلحان اللہ علیہ صلحان اللہ
تن منہ آبار حلیمہ بونیر
NIC: 15101-6256957-3 NIC: 15101-0612861-9

ATTESTED

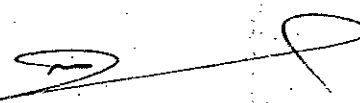
Mushtaq Ahmad
Associate Notary Public
Distt: Courts Duggar Buner

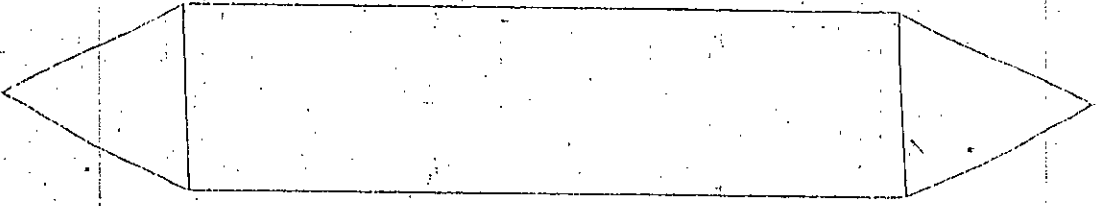
NOTICE To:

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1. Government of Khybar Pakhtunkhwa through Secretary Elementary and Secondary Education at Civil Secretariat Peshawar.
2. Director Elementary and Secondary Education Khybar Pakhtunkhwa at Peshawar.
3. District Education Officer (Female) District Buner at Dggar.
(Through Additional Advocate General Govt. of K.P.K at Service Tribunal K.P.K at Peshawar).

Please note that I am counsel for the appellant and going to file Service appeal, before the Honourable Service Tribunal Khybar Pakhtunkhwa at Peshawar / Camp court at Gulkada Swat.


MUHAMMAD JAVAID KHAN
Advocate, Supreme Court of Pakistan



منجانب اسپرینٹ

2023

مہر

حکومت

نام

بی بی سائرہ

تاریخ

زیر دفتہ / دفعات

جہ

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ آن مقام سرورس ٹریبیونل خیر بختون خواہ شاہور ٹیپ ٹورٹ سمرات کیلئے طے جاوید خانجی، A.O. اینڈ فوری طور پر کیوں یاد ٹورٹ

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 و تقرر ثالث فیصلہ برحلف دینے جواب دہی اور قبال دعویٰ اور خوبصورت

ڈگری کرانے اجراء اور وصولی چیک و روپیہ اور عرضی دعویٰ اور درخواست ہر قسم کی تصدیق زرا اس پر

دستخط کرنا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری یکطرفہ اپیل کی برآمد اور منسوخی اور

دائر کرنے، اپیل نگرانی و نشانی و پیروی کرنے کا اختیار ہوگا۔ اور یہ صورت ضرورت مقدمہ مذکورہ

کے حق یا جزوی کاروائی کے واسطے اور وکیل یا مختیار قانونی کر اپنے ہمراہ یا اپنی بجائی تقرر

کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہونگے۔

اور اس کا ساختہ پرداختہ منظور و قبول ہوگا۔ اور دوران ان مقدمہ میں جو خرچہ دہر جانہ التوائے

مقدمہ کے سبب سے ہوگا۔ اس کے مستحق وکیل صاحب موصوف ہونگے۔ نیز بقایا خرچہ کی وصولی

کرنے کا اختیار حاصل ہوگا۔ اگر کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند

نہ ہونگے۔ کہ پیروی مقدمہ مذکورہ کریں۔ لہذا کالت نامہ لکھ دیا کہ سند ہے۔

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الرقوم

العبد گواہ بشہد العبد

AC Accepted
Jamil
کیلئے منظور ہے۔
بمقام

العبد
بی بی سائرہ بزرگہ قطار خاص