### FORM OF ORDER SHEET

	. Court o	f .	
	App	peal No. 2520/2023	
S.No.	Date of order proceedings	Order or other proceedings with signature of judge	
1	2	3	
1	05/12/2023	The appeal of Mst. Bushra resubm	itted today by
		Sardar Muhammad Asif Advocate. It is fixed f	or preliminary
	, ,	hearing before touring Single Bench at	A.Abad on
		By the order of Cha	irman
		REGISTRA	R
	,		
	· · · · · · · · · · · · · · · · · · ·		

The appeal of Mst. Bushra received today i.e on 20.11.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and submission within 15 days. 🍧

- 1- Check list is not attached with the appeal.
- 2- Appeal has not been flagged/marked with annexures marks.
- 3- Address of appellant is incomplete which may be completed according to rule-6 of the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 4- Annexures of the appeal are unattested.
- 5- In each and every documents the name of the appellant be highlighted.
- 6- Copy of appointment order in respect of appellant be placed on it.
- 7- Annexure-A (Page no. 8 to 15 & 25) of the appeal are illegible which may be replaced by legible/better one.
- 8- Five more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 3634 /S.T,

Dt. 21 - 11 /2023.

High-Court A.Abad.

Sardar Muhammad Asif Adv.

REGISTRAR SERVICE TRIBUNAL KHYBER PAKHTUNKHWA -PESHAWAR.

6 W Vo Remore 8 61 3 (6) 541 (m) By 6, B1 (5) A. S.No.7 Remand oftog Gluby y, souletings



## PAKTUNKHWA PESHAWAR

Appeal No.\_\_\_\_/2023

Bushra R/o Teacher Government Girls Primary School Jamal Banda Torghar.

...APPELLANT Khyber Pakhtukhwa Service Tribunal

V/S

Dated 20-11-2023

- Secretary elementary and Secondary Education KPK, Secretariat Peshawar.
- Director elementary and Secondary Education KPK Directorate Peshawar.
- 3. District Education Officer (Female) Torghar.

...RESPONDENTS

APPEAL U/S 4 OF SERVICE TRIBUNAL ACT 1974, AGAINST THE IN-ACTION OF RESPONDENTS QUA TRANSFER OF THE APPELLANT TO THEIR NATIVE DISTRICT I-E MANSHERA FROM DISTRICT TORGHAR DESPITE OF THE FACT THAT APPELLANT HAVE ALREADY SPENT (10 YEARS) MUCH MORE TIME THEN THE STIPULATED/PRISCRIBED PERIOD AS PER LAW AND AS PER CONTRACT SIGNED BETWEEN APPELLANT AND DEPARTMENT.

Megistelle3

**AND** 

NON GRANTING OF BPS-15 TO THE APPELLANT AFTER ALMOST TEN YEARS OF CONTINUES SERVICE, UNLIKE OTHER SIMILAR PLACED TEACHERS OF DISTRICT MANSHERA

**AND** 

## PAKTUNKHWA PESHAWAR

Appeal No.\_\_\_\_/2023

Bushra Teacher Government Girls Primary School Jamal Banda Torghar R/o Torghar

...APPELLANT

V/S

Director Elementary and Secondary Education & Others ...RESPONDENTS

#### **SERVICE TRIBUNAL**

#### **INDEX**

S.No	Description	Page No	Annexure
1	Service Appeal Along with Affidavit		1-5
2	Copy of Appointment Order	"A"	6-9
3	Copy of One of Affidavit	"B"	10-11
4	Copy of Departmental Appeal	"c"	12-16
5.	VakalatNama		17

APPELLANT

Date 17/11/23

Through

(Sardar Muhammad Asif)

(Muhammad Asjad Pervaz Abbasi) Advocates, High Court

Abbottabad



## BEFORE THE SERVICE TRIBUNAL KHYBER

PAKTUNKHWA PESHAWAR

<u>"</u> ఎక్కిం

Appeal No.\_\_\_\_/2023

Bushra Teacher Government Girls Primary School Jamal Banda Torghar R/o Torghar

...APPELLANT

#### V/S

- 1. Director Elementary and Secondary Education KPK Directorate Peshawar.
- 2. District Education Officer (Female) Torghar.

... RESPONDENTS

APPEAL U/S 4 OF SERVICE TRIBUNAL ACT 1974, AGAINST THE INACTION OF RESPONDENTS QUA TRANSFER OF THE APPELLANT TO THEIR NATIVE DISTRICT I-E MANSHERA FROM DISTRICT TORGHAR DESPITE OF THE FACT THAT APPELLANT HAVE ALREADY SPENT (10 YEARS) MUCH MORE TIME THEN THE STIPULATED/PRISCRIBED PERIOD AS PER LAW AND AS PER CONTRACT SIGNED BETWEEN APPELLANT AND DEPARTMENT.

#### AND

NON GRANTING OF BPS-15 TO THE APPELLANT AFTER ALMOST TEN YEARS OF CONTINUES SERVICE, UNLIKE OTHER SIMILAR PLACED TEACHERS OF DISTRICT MANSHERA

#### AND

AGAINST NON-REDRESSAL OF GREVIANCE OF APPELLANT DISPITE OF REPEATED APPLICATION/PETITION/APPEAL FILED BY THE APPELLANT.

#### AND

AGAINST THE DISCRIMINATION BEING FACED BY THE APPELLANT AT THE HANDS OF AUTHORITIRS/RESPONDENTS WHEREBY SIMILARLY PLACED EMPLOYEES WERE TRANSFERRED AND APPELLANT ARE LEFT TO FACE RIGORS OF HARD AREAS.

#### PRAYER:

ON THE ACCEPTANCE OF INSTANT APPEAL THE RESPONDENTS MAY BE DIRECTED TO TRANSFER THE APPELLANT TO THEIR NATIVE DISTRICT I-E MANSHERA AS PER POLICY, FROM DISTRICT TORGHAR, AND RESPONDENTS MAY ALSO BE DIRECTED TO GRANT BPS-15 TO THE APPELLANT LIKE OTHER SIMILAR PLACED TEACHERS AND RESPONDENTS ALSO BE DIRECTED TO TRANSFER APPELLANT, ANY OTHER RELIEF WHICH IS DEEMED FIT AND PROPER IN THE CIRCUMSTANCES BE CASE MAY ALSO BE GRANTED TO THE APPELLANT.

#### Respectfully Sheweth:



- 1. That, the appellant is hailing from District Manshera and are highly educated, having qualification of MA, M.ED, and B.ED etc.
- 2. That, the appellant were inducted into service on merits as PST BPS-12 in 2013 and 2015 respectively on the strength of District Manshera and were assigned duties to different schools of Torghar, which was once happened to be a provincial administrative tribal area, controlled and managed from District Manshera (Copy of Appointment Order is attached as Annexure "A")
- 3. That, at the time of appointment, the appellant were directed by the respondents to execute affidavit, individually to the effect that they would serve at torghar continuously for three years without any demand of transfer to their native District nor they would leave the service and after completion of such stipulated period they would be transferred to their own district. The appellant submitted above said affidavit to the respondents. (Copy of One of Affidavit is Annexed as Annexure "B")
- 4. That, besides appellant, there were other teacher who belonged to District Shangla, who were transferred to their District after completion of period of three years as were mentioned in affidavit, and few of them transferred to District Manshera recently.
- 5. That, since appointment, the appellant were serving at District Torghar, and on completion of agreed period of three years, the appellant moved many application to different forums for their transferred as per law, to their own District but in vain. (Copy of Departmental Appeal is Attached as Annexure "C")
- 6. That, the appellant had been serving the department since 2013 and are still working in BPS 14 to some of the appellant and other are still in BPS-12 unlike other similar teachers of other Districts who had already been granted BPS-15 which itself is a classical example of discrimination. The appellant is entitled for the same scale i-e BPS-15.
- That, the appellant filled a complained/appeal to the respondents for the redressal of their grievance which has not been decided up till now, hence instant appeal.

Feeling aggrieved from above mentioned in-actions and discriminations of respondents, the appellant have come to this honorable Court on the following inter-alia amongst many other grounds:-

#### **GROUNDS:**



- 1. That, the in-action of non-transferring of appellant to their own District even after spending much more time than stipulated period of three year is illegal, unlawful, perverse, unilateral and against the settled principle of natural justice and fair play.
- 2. That, as per government policy regarding hard areas, the civil servant must be transferred after one year maximum.
- 3. That, a lot of similarly placed teachers had already been transferred to their District more particularly District Shangla. Non-transferring of appellant is nothing but to corner the appellant and the appellant is simply victimized of discrimination by the respondents.
- 4. That, the appellant is female and have to travel for 3 to 4 hours continuously to reach at their destination with fare of almost Rs. 4,000/- per trip, even then the grievance of appellant are not being redressed.
- 5. That, the appellant had been serving the department since 2013 and are still working in BPS 14 to some of the appellant and other are still in BPS-12 unlike other similar teachers of other Districts who had already been granted BPS-15 which itself is a classical example of discrimination. The appellant is entitled for the same scale i-e BPS-15.
- That, despite of the continues application/ appeal/ petition/complaint the appellant are still waiting for justice, but a duff ear turn towards them.
- 7. That, even the transferred policy of the government is put in abeyance by the respondents and the appellant is constrained to serve at the place for along eleven years, which is otherwise hard one.
- 8. That, other point would be raised at the time of arguments.
- 9. That, the appeal in hand is well within time.
- 10. That, the honorable court has exclusive jurisdiction to adjudicate and proper court fee has been annexed.
- 11. That, notices of appeal in hand has also been issued to respondents.

#### PRAYER:-



IT IS THEREFORE, HUMBLY PRAYED THAT ON THE ACCEPTANCE OF INSTANT APPEAL THE RESPONDENTS MAY BE DIRECTED TO TRANSFER THE APPELLANT TO THEIR NATIVE DISTRICT I-E MANSHERA AS PER POLICY, FROM DISTRICT TORGHAR, AND RESPONDENTS MAY ALSO BE DIRECTED TO GRANT BPS-15 TO THE APPELLANT LIKE OTHER SIMILAR PLACED TEACHERS AND RESPONDENTS ALSO BE DIRECTED TO TRANSFER APPELLANT, ANY OTHER RELIEF WHICH IS DEEMED FIT AND PROPER IN THE CIRCUMSTANCES BE CASE MAY ALSO BE GRANTED TO THE APPELLANT.

APPELLANT

Date /2/11/2>

Through

(Sardar Muhammad Asif)

&

(Muhammad Asjad Pervaz Abbasi) Advocates, High Court Abbettabad

#### **VERIFICATION:-**

Verification on oath that contents of the foregoing appeal are true and correct to best of my knowledge and belief and nothing concealed from this honorable tribunal.

APPELLANT



## PAKTUNKHWA PESHAWAR

Appeal No.\_\_\_\_/2023

Bushra R/o Teacher Government Girls Primary School Jamal Banda Torghar.

...APPELLANT

V/S

Secretary Elementary and Secondary Education & Others
...RESPONDENTS

#### **AFFIDAVIT**

I, Bushra R/o Teacher Government Girls Primary School Jamal Banda Torghar, solemnly affirm and declare on oath that the contents of the titled "Instant Appeal" are true and correct to the best of my knowledge belief and nothing has been concealed from this honorable court.

Date. 17/11/23

DEPONENT

OFFICE OF THE METERICA POMOATION ENFICENTIFEMALE) TON GHAR MAIL

OFFICE ORDER/APPOINTMENT

OFFICE ORDER/APPOINTMENT

AND ABORDER

Consequent upon the recommendation/ approval of the District selection Committee Tor-Ghar in its meeting hold on 18/01/2013 the Competent Authority is pleased to appoint the following fresh trained Female candidates on merit having the prescribed qualification in BPS 12(ns.700) - 500-22000) plus usual allowances as admissible under the rules against the vacant post of PST (Female) mentioned against each their names on regular basis under the existing policy of the Provincial Govt: on terms and conditions given below with effect from the date of their taking over charge in the interest of public service.

#### "Tappa Wise" Discrict Tor Ghar

	•				,			
5,80	Candidate NAME	Father's Name	Tappa	Quaif:	Score	·School/Station where posted	Zane	Remarks
	Sumaira Gul .	Muhammad Ismaeel	Hassan : Zai	BA	42.41 -	GGPS Mareer (HZ)	Summer	Against V /P
2	Farzano Habib	Habib Khan	Gassikhail	BA	42.38	IGGPS Gul Oheri (8K)	Summer	Against V /P
3	Saba Gul	Shah Jalian	Mada . Khai	ВЛ	42.05	GGPS Maira Mada Khail	Summer	Against V /P

#### "Open Merit" Adjacent Districts

	•	•						
S.N o	Candidate Name	Father's Hamo	Donalcila	Qualf:	Scere	School/Station where Posted	Zone	Remarks
1	Ayesha Humma Swali	Muhammad Shaukai Khan	Mansehra	MSc	77.80	GGPS Palosa (HZ)	Summer	Against V /P
3	Adeela Shailkat Swall a	Muhammad Shaukat Khan	Mansehra	MSc **	75.70	CGPS Garhi (MZ)	Stantagt 453	^gainst V /P
3	Faiza Tabassum	Muhammad Bashir	Mansehra	MSc	75.65 GGPS Geelo (BK) Winter A		Against V /P	
سنزر	rAisha Bibi	Fault Muliammad	Mansohra	MSc ke	75.06	GGPS Kand Bala (BK)	Summer ,,	Agsinst V /P
5	Nosheon Kanwal	Sikandar Hayat	Mansehra	,MA	65.80	(iGPS Gul Dalree (BK)	Summer	Against V /P
-6	Phool Bibl	Muhamad Farooq	Mansehra .	EMA SE	\$2007 F- 64.11	G SPS Zeezari (BK) =	Summer	Against V /P
7	Raham Bibi	Zamanat Khan		BSc	63.78	GC PS Khadang (AZ)	Summer	Against V /F
8	Safia Bibi	Syed Sultan Shah	Mansehra	MV	63.13	GG PS Kand Paayeen (AZ)	Winter	₽gainst V /F
9	Sadia Shoakat	Muhammad Shoukat	Mansehra	MA	62.64	GG 25 New Killay (HZ)	Smower	Against V /P
10	Bibi Saeeda tun Nisa	Oari Abdul Rashid		. NAA		GCPS Blmbal (AZ) والمحادثة المحادثة المحادثة المحادثة المحادثة المحادثة المحادثة المحادثة المحادثة المحادثة الم	Summer	Against V /P

. 110

### Office Order/Appointment

Consequent upon the recommendation approval of the district selection committee tor ghar in its meeting held on 18-01-2013 the competent authority is pleased to appoint the following fresh trained female candidates on merit having the prescribed qualification in BPS-12 (Rs.7000 500-22000) plus usual allowances as admissible under the rules against the vacant post to PST (Female) mentioned against each their names on regular basis under the existing policy of the Provincial Govt on terms and condition given below with effect from the dates of their taking over charge in the interest of public service.

#### <u>"Tappa Wise District Tor Ghar</u>

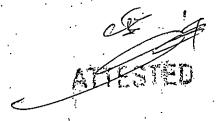
S.N	Candidate Name	Father Name	Tappa	Quaif	Score	School/Station	Zone	Remarks
0				1		where posted		
1	Sumaira Gul	Muhammad Ismaeei	Hassan Zai	BA	42.41	GGPS Mareer	Summer	Against V/P
2	Farzena Habib	Habib Khan	Bassikhail	ВА	42.38	GGPS Gul Dheri (BK)	Summer	Against V/P
3	Saba Gul	Shah jahan	Mada Khail	BA	42.05	GGPS Maira Made Khail	Summer	Against V/P

#### "Open Merit" Adjacent Districts

S.No	Candidate Name	Father Name	Domicilo	Quaif	Score	School/Station where posted	Zone	Remarks
1	· Ayesha Humma Swati	Muhammad Shaukat Khan	Mansehra	MSc	77.88	GGPS Palosa (HZ)	Summer	Against V/P
2	Adeela Shaukat Swati	Muhammad Shaukat Khan	Mansehra	MSc	76.70	GGPS Garhi (HZ)	Summer	Against V/P
3	Faiza Tabassum	Muhammad Bashir	Mansehra	MSc	75.65	GGPS Geeto (BK)	Winter	Against V/P
4	Aisha Bibi	Fagir Muhammad	Mansehra	MSc	75.00	GGPS Kanda Bala (BK)	Summer	Against V/P
5	Nosheen Kanwa!	Sikander Hayat	Mansehra	MA	65.80	GGPS Gul Dairee (BK)	Summer	Against V/P
6	Phool Bibi	Muhammad Farooq	Mansehra	MA	64.11	GGPS Zeezari (BK)	Summer	Against V/P
7	Raham Bibi	Zemanat Khan	Shangla	BSc	63.78	GGPS Khadang (AZ)	Summer	Against V/P
8	Safia Bibi	Syed Sultan Shah	Mansehra	МА	63.13	GGPS Kand Paayeen (AZ)	Winter	Against V/P
9	Sadia Shoakat	Muhammad Shoukat	Mansehra	MA	62.64	GGPS New Killay (HZ)	Summer	Against V/P
10	Bibi Saeeda tun Nisa	Qari Abdul Rashid	Mansehra	MA	61.80	GGPS Bimbal (AZ)	Summer	Against
11	Sobia Bibi	Abdul Hamid	Mansehra	MA	58.74	GGPS Bimbal (AZ)	Summer	Against
12	Rabia	Aurangzeb	Mansehra	MA	58.64	GGPS Judba	Summer	Against V/P
13								Against V/P
14	Zahirat Bibi	Rahim Shah	Shangla	BSc	68.00	GGPS Kander (BK)	Summer	Against V/P
15	Nazia Haroon	Muhammad Haroon	Mansehra	MA	57.16	GGPS Gangi (HZ)	Winter	Against V/P
16	Shagulia Bibi	Hazrat Younas	Shangla	MA	55.89	GGPS Cirapa Biratoni (BK)	Winter	Against V/P
17	Tahira Bibl	Abdul Qayyum	Mansehra	BSc	53.52	GGPS Arbay Jalband (AZ)	Winter	Against V/P
18	Farheena Ali Akbar	All Akbar	Mansehra	MA	55.42	GGPS Murate (AZ)	Winter	Against V/P
19	Pari Had	Aniullah		MA	55.17	GGPS Khanday (BK)	Winter	AgainsV/P

	J.			_		<del></del>	•	(3)	<i>j</i>
1		5.			<i>3)'</i> '	ED)			dba
<u>.</u>	·	Shabina	Muhammad Zamm	Mansehra	NM.	52.57	RGPS Judio No. II	Summer	^ga
	3278	Gāzāla vas vers er eve Vasce — vas vers er eve	of alignment of the second	Firinila.	CHAPTER WAS	理論	mades valoed (BK)	Winter	4,50
	40	Bushra lqbai	Muhamined jebal	telarian liga	ńΑ	52.32	GGF's Rooglay (AZ)	Milles	Agai s
	Drikkee Takes	and the Harrist device handle	Muhangaad Mashia Masamana masaman	Haripin Regeneration	MA	10101	With the state of		Ø Apal .
	42	Tehminu Bibi	Oul Rehiago	Menselvá	(:A	.#1.#3.	UGP: Kend (19) (HZ)	Vinter	 हेसुझ
	43	Rabia Bibl	Aurany Zeb	Manselira	MA	51.86	GOPS Taigram (HZ)	Winter	Agai
E	544°2 M°542	WZMajFaraz (1.7274)	Sarlarez Khana	ligerischta)	TX MA	Trient	<u>EGGPS(Ko) PF (NR)</u>	Summer	Age
	45	Shahida Bibl	Moulvi Muhammao Zaman	Mansehra	MÁ	61.66 <sub>j.</sub>	GGPS Kotlay (HK)	Summer	Agair (
E C		Rizwana Bibliza wa	aldaydergZamane 汉称:	Mansehra	MA	<u>5</u> 1:56%	(GGPSiShokati (HZI)	Winter	Agair
,	47	Saima Khatoon	Noor Rehman	Mansehra	MΛ	51.51	GGPS (vairata (AZ)	Winter	Agair
	48.	-Alsha-Begun	সূত্রি:MuhammadiKhang	EMansen a	APPENDATE OF THE PROPERTY OF T	715 4 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	-GOPS Williams (1-2)	DATE TO SERVE	<del>j jed</del> ain
	F195	ESajeda Bibi yawa	Rozi Khan	Shanglar	TE MAY IE	51397	# GGPs Karbon (BK)	Wieter	Auain
	.50	Irum Bashir	Muhammad Bashir	Mansebra	,MA.	51.29	GGPS Karna (HZ)	Summer	√öaln:
	51	Rubi Islamul Haq	Islamul Haq	Mansehra	MA	51.10	GGPS flour Payeen (BK)	Summer	Agaic
	(52)	Rabla Khaloon	Molvi Muhammad Zaman	Manschip	MA ·	ช <b>0.</b> 51	GGPS Katna (HZ)	Summer	Again
		Jugo Shahzadi	Abdulidamecozeky ar	OMATICA AXE	The contract of the contract o	7.00 ±1.00 50.51	"GGPS Judga No. 1 - State of Late	Jávminiár	K:'∧oair
٠	-		Muhammad	<u> </u>				<u>-</u>	,
. 2	Saki-	şilina Hamayuni 👡 🐺		(Manseliya)	appe BA	50.42	PGGPS,Shig(fat) (jdZ)	Winter	Again
	.55	Nalla Bibi	Muhammad Igbal	Mansetira	MA	50.14	GGPS-Murado (AZ)	Winter	Again
	56	Naila Bibi	Sain Muhammaad	Mansenta	- MA	50.01	- GGPS Ormal (HZ)	Summer	Again
		agulikehanarabaansar	Muhammad Rehan		MA		· .		
		AGUITATIA IA		CONTRACTOR OF THE	ASSESSED OF THE PERSON NAMED IN	3.19.35 T	CCPS*KamaakBanda*(MK)	ជនបញ្ជាក់ទីកង់	<b>Contract</b>
	58	Bibi Salma Naghar	S.Pir Azam Shah	Mansehra	MA	49.72	GGPS Savey Narange (AZ)	Winter	Again
4		CREDITION OF THE PARTY OF THE P	TN asir uddin - prosecution	「Shanulass」。 相対で、記事を	Joseph MA	49.37	√GGrS soral (BK)/	Winter	Again
١	60	Saiqa Idrees	Muhammad Adrees	Mensehra t	MA , ,,	49.27	GGrs Bugdo (112)	Summer	Agaitt
		Rooblina Bibli	Sherin Zeb	Shongla A	MA	48.88	GGPS Noor Kaleem (BK)	Winter	Again
	62	Bibl Farzana Rehman	Noor ur Rahman	i Mansehra	MA'	48.87	GGPS Kalsoona (MK)	Winter	Agai

(3)



0 ⋖ Against GGPS Kund Bala (BK) Summer Mansehra MA 56.17 Mohammad iqbal Javaria 20 VΨ Winter Against MA 55.66 GGPS Taigram (HZ) Naseer ud Din Shah Mansehra 21 Farah Bibi V/P Against GGPS Check (BK) Summer MA 55.11 Duri Aman Qureshi Mansehra 22 Jamila Bano V/P Against V/P GGPS Khandry (BK) Winter MA 55.16 Shamsher Ali Shangia Sumbal Bibi 23 Summer Against GGPS Check (BK) MA 55.03 Munawar Khan Mansehra Lubna Urcoi 24 ₩P. Against Summer GGPS Kuriray (HZ) Mansehra ΜA 54.93 Habib ur Rehman 25 Farzana V/P Against Ashraf Khan Mansehra ΜA 54.73 GGPS Jatka syedan Summer Taliat Jabeen 26 V/P (BK) Against MA 54,68 GGPS Geeto (BK) Winter Shangla Gul Baz Khari Agal Bibi 27 V/P Against Winter 53.63 GGPS Kalsa (BK) MA Faziat Bibi Abdul Karim Shangla 28 ٧Æ Against Summer GGPS Doba (MK) Khawaj Muhammad Mansehra MΑ 53,42 Robina Bibi 29 VIP Against V/P MA 53.01 GGPS Buto Banda (BK) Summer Shangla Saji Gul 30 Mumtaz Bagum Against GGPS Kalish (BK) Winter MA 52.86 Shangla Sultan Mehmood 31 Shamim Akhter VIP Winter Against MA 52.89 GGPS Chapra Judba Siar Khan Shangla Shahnaz Begum 32 (BK) WP Against Summer GGPS Chapra Judba Mansehra MA 52,79 Masta Jan 33 Nazma Sherin V/P (BK) Against V/P GGPS Gelkot (NK) Summer BSc 52.69 Mansehra Abdul Qayyum Bibi Zainab 34 .Winter Against GGPS Kund Tilli (HZ) ΜA 52.64 Mansehra Gohar Rehman 35 Shabana Kousar VIP Against GGFS Zeezat (Bk) MΑ 52.62 Abdul Karim Shangla 36 Ruqia Bibi V/P Against Winter GGPS Zonglay (AZ) 52.60 Ghulam Sarwar Mansehra MA Samina Bibi 37  $V\!\!J\!\!D$ Khan Against GGPS Judba No.II Summer 52.57 MA. Manschra Muhammad Zaman 38 Shabina V/P Against V/P Winter Taj Muhammad MΑ 57.51 GGPS Kareen (Bk) Shangla 39 Gazala Khari Against V/P Winter 52.32 **GGPS** Mansehra MA Muhammad Iqbai Bushra Iqbal 40 **GGPS** Summer Against 32.02 MA Muhammad Bashir Shangla 41 Noshaba Bibi  $V \vdash \Box$ Against **GGPS** Winter MA 51.87 Gul Rehman Mansehra rehmina Bibi 42 Against Winter Aurang Zeb Mansehra MA 51.86 GGPS taigram (HZ) 43 Rabia Bibi V/P Against V/P MA 61.65 GGPS Korlay (NK) Summer Mansehra Sarfaraz Khan 44 Uzma Faraz Summer Against MA 51.66 GGPS Kotlay (NK) 45 Shahida Bibi Moulvi Muhammad Mansehra V/P Zaman .Against GGPS Shokati (HZ) Winter MA 51.56 Mansehra 46 Rizwana Bibi Hayder Zaman V/P Against Winter GGPS Murata (AZ) Noor Rehman Mansehra MA 51 51 47 Saima Khatoon V/P Against V/P Winter MΑ 51.47 GGPS Mundo (AZ) Taj Muhammad Mansehra 48 Aisha Begum Khan 51.39 GGPS Karoon (BK) Winter Against MA Rozi Khan Shanqla 49 Sajeda Bibi V/P GGPS Katna (HZ) Summer Against MA 51.29 Muhammad Bashir Mansehra 50 Irum Bashir V/P Against 51.10 GGPS Dour payee (BK) Summer MA 51 Rubi Isamul Haq Isamul Haq Mansehra V/P Against V/P Molvi Muhammad GGPS Karna (HZ) Summer Mansehra MA 60.51 52 Rabia Khatoon Zaman 50.51 GGPS Judba No. 1 Summer Against Mansehra MA 53 irum Shezadi Abdul Hameed V/P GGPS Shokati (HZ) Winter Against Muhammad Mansehra BA 52,42 54 Sidra Hamayun Hamayun Against MA 50,14 GGPS Murado (AZ) γγιυτει 55 Naila Bibi Muhammad Iqbal Mansehra V/P GGPS Ormal (HZ) Against V/P Summer Sain Muhammad Mansehra MA 50.01 56 Naila 8ibi AdainsV/P Summer MΑ 49.75 GGPS Kameel Banda Muhammad Rehan Mansehra

Gul Rehana

57

the Highlight Wind Start The Market destricted to the state of the - Abitable Spire Continue -16211600 13581193774-2

بيل طق

والم المراجع ا الر الله عقرت في قل و تسر عبى لسي الله سيرات الميال رفيا لو فقر ن مهال بر

وَ إِنَّ مِنْ اللَّهِ مِنْ لِللَّهِ مِنْ لِللَّهِ مِنْ اللَّهِ مِنْ اللَّهُ مِنْ اللَّالِمُ مِنْ اللَّهُ مِنْ اللَّا مِنْ اللَّهُ مِنْ اللَّهُ مِنْ اللَّهُ مِنْ

10 6 2/ dle 6 ide 20 per 52 hand de 100

- Ky June July

, with an eles

13503-295774-2

مراس مال! المسال المسا

مودباندگزارش کی جاتی ہے کہ 2013ء میں ضلع مانہمرہ سے ضلع تو رغر تعینات کئے گئے تھے۔اس شرائط کے ساتھ کہ جمیں تین سال بعدا پیضلع ٹر انسفر کر دیا جائے گا گر گیارہ سال ہونے کو ہیں اور جمیں ٹرانسفر تیل کیا جارہا۔

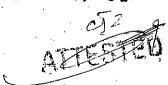
جبکہ اس دوران 45 ساتڈہ اور ضلع تو رغر سے تعلق رکھنے والی اساتذہ سفارش اور اعلیٰ تعلقات کی بناء پر اپنے اصلاع ٹر انسفر ہو چکی ہے۔ یہ سب اکسی سے علم میں ہے۔

جناب عالیٰ! (Female) DEO وَرَعْ نَهِ بِم ہے وعدہ کیا تھا کہ اب ایک یا دو ٹیچرز تورغرے ٹرانسفر نہیں ہوگئی۔ بلکہ آپ سب کوایک ساتھ ٹرانسفر کیا جائے گا۔ جبکہ شازیہ زیب جی جی بی ایس سر بگواور رضوانہ جی جی پی ایس شوکائی صلح انسہ وہ اور ایسٹ آبدا ٹرانسفر ہو چکی ہیں۔ کیا ان کے جنامے ہے Staff Gap نہیں ہوگا؟؟ کیا سکول بند نہیں ہوگا؟؟ کیا سکول بند نہیں ہوگا؟؟ کیا سکول بند

جناب عالى!

جناب عالی! صلع مانسمرہ سے بحرتی ہونے والی چند اسانڈہ کوسکیل 14 دیا گیا ہے جس میں شرط یہ کھی گئ شی کہ اگر سکیل 14 لیا تو NOC نہیں دی جاسکے گی۔ اگر سکیل 14 لینگے تو ٹرانسفری صورت میں آپ کوسکیل 14 Regfuse کرنا پڑے گا۔ ہماری ہے بسی کا اغدازہ اس بات سے لگایا جا سکتا ہے کہ ہم نے تعلیمی تابلیت ہونے کے باوجود سکیل نہیں لیا کیونکہ ہمارے گھر یلوطالات بہت زیا وہ خراب بین ہمارے بیج دوسروں کے رحم وکرم پر بل دے باوجود سکیل نہیں لیا کیونکہ ہمارے گھر یلوطالات بہت زیا وہ خراب بین ہمارے بیج دوسروں کے رحم وکرم پر بل دے بین

جناب عالى! تى كى نبيس چاہي اگر بم اپنے كھروں سے ديونى برقرار ركھ كے تو بم سكيل 14 لازى ليت



ر العلی الع

جناب عالیٰ! آپ کے پاس اپنسکول چلانے کیلئے کی اور داستے ہیں ہماری زندگیاں قربان کرنے کا داستہ کیوں؟؟؟ہم ساری زندگی تورغر کے نام ہیں کرسکتے۔ ہمارے بیچ دوسروں کے رحم ورکم پررہ رہے ہیں۔
ہمارے گود کے بیچ آئے روزئی ٹی بیماریوں میں مبتلا ہو گئے ہیں اور آپ ان تمام باتوں سے بخو بی آگاہ ہیں۔
لہذا تمام ٹیچرز کا آپ سے پروز درمطالبہ ہمیکہ ان ٹیچرز کی ٹرانسفر کوروکا جائے یا پھر ہم سب کوایک ساتھ ٹرانسفر
کیا جائے۔ بصورت دیگر ہم عدالت کا رخ کریں گے۔ سیکرٹریٹ جائیں گے۔ سکول بند کریں گے اور جو مناسب ہوا
سیخ جن کے لیے کریں گے۔ ضلع مانسم و سیعلق رکھنے والی اساتندہ کے نام مندرجہ ذیل ہیں۔

المرقوم: 2023-07-20

	<u> </u>	<u>023 ( 37)</u>			!
/	· Q CXY	13501-1295774-2	جی جی پی ایس بمیل	بى بىسلىنى نگار	
<u> </u>	Q do Q	13503-0491117-0	جى جى بي اي <i>س كرنل ح</i> سن زئى	رابعه خاتون	
	Ligh	13501-3879556-0	جی جی پی ایس بگدو	صاعقه	_p
		/ 13501-9098694-6	جي جي پي اليس جلينگ	ناكله بي بي	-
	M	13503-5580290-8	جی جی پی ایس کمال بانثره	سابشره بي بي	_0
	Sarwa	<sup>↑</sup> 13504-7245998-6	جي جي ايس بانده دوسية جيد	صائمه بي بي	
		13501-0421418-	ی جی بی الیس دارو	تنزيلهامان	_2
		13501-12898	جی جی پی الیس اور ٹل 🕜 – 🖔	نائله بي بي	-^
		13504-948480	١-6 ين ايس ايس الم	روبينه بي بي	_9
	Talum	13504-169173	جي جي ايس کڙهي جد به 🖰 🛫 🖟	طاہرہ بی بی	- ا-
	Sheh neg	13503-188484	جی جی پی ایس کنوے 4 - 5	شهنازبی بی	_11
		212201-85729810	جی جی پی اکس فلوئے کر نارنج 😚	سعد بيه بي بي	<b>***</b>
	San	13504-057483	جی جی پی ایس موراتاں 👝 🛭 🖔	صائمه المحاور	19
	-1	12503-949386	٠٤٠	فرينه بي بي	_10
	barleer	12 602-7790636	جی جی پی الیس سرادو	صفيه بي بي	_10
	Sh	13503-7790636	8 8 5 m Sun	in E	te
X	~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~		•	•	

عرب الله المعلق الم المعلق ا

لبداميرانى فرماكر مارى ورفواست مي ومكاط

Bla Bland



### GOVERNMENT OF KHYBER PAKHTUNKHWA

ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

No. <u>SO E&SED (P/F)2-1/Forghar/2023.</u> Dated Peshawar, the 24<sup>th</sup> July, 2023

To

The Director, E&SE Khyber Pakhtuokhwa, Peshawar,

Subject:

ATTPARTMENTAL APPEAL

I am directed to refer to the subject cited above and to enclose herewith a copy of self-explanatory of joint appeal submitted by Bibi Salma Nagar GGPS Bembal District Torghan and others for submission of views/comments within 07-days positively for further processing of the case accordingly.

Buch deaborg.

SPECTION OFFICER DORO.

#### Endst of even blu & dute: -

Cupy forwarded to the: -.

PS to Secretary E&SP Department Khyber Pakhtunkhweis

2 - Master File.

fite Monotono and





# GOVERNMENT OF KHYBER PAKHTUNKHWA ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

No. SO/E&SED (P/F)2-1/Torghar/2023 Dated Peshawar the 24th July, 2023-11-30

To

The Director

E&SE Khyber Pakhtunkhwa

Peshawar

Subject;

DEPARTMENTAL APPEAL.

I am directed to refer the subject cited above and to enclose herewith a copy of above explanatory of joint appeal submitted by Bibi Salma Nagar GGPS

Bembal District Toughar and others for submission of views/ comments within 07
Days positively for further processing of the case accordingly.

Ends As above.

SECTION OFFICER (P/F)

#### Endst: of even No & date:

Copy forwarding to the:-

- 1. PS to Secretary E&SE Department Khyber Pakhtunkhwa.
- 2. Master File.

SECTION OFFICER (P/F)

