## FORM OF ORDER SHEET

Court of			
		1	••
Appeal No.	-		2526/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1.	2 .	3
1-	05/12/2023	The appeal of Ms. Saiqa Idrees resubmitted today
		by Sardar Muhammad Asif Advocate. It is fixed for preliminary hearing before touring Single Bench at A.Abad
		on
		By the order of Chairman  REGISTRAR
`		

The appeal of Mst. Saiga Idrees 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 results on the policy business on 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. 3636 /S.T.

Dt. 21 - 11 /2023.

Sardar Muhammad Asif Adv. High Court A.Abad. REGISTRAR SERVICE TRIBUNAL

SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

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

Saiqa Idrees R/o Teacher Government Girls Primary School Bagdo Torghar.

...APPELLANT Khyber Pakhtukhwa Service Tribunal

V/S

- Dated 20-11-2073
- 1. Secretary elementary and Secondary Education KPK, Secretariat Peshawar.
- 2. 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.

Filer May

#### 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** 

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

Saiqa Idrees Teacher Government Girls Primary School Bagdo Torghar R/o Torghar.

...APPELLANT

V/S

Director Elementary and Secondary Education & Others ...RESPONDENTS

## **SERVICE TRIBUNAL**

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2	Copy of Appointment Order	"A"	6- 9
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4	Copy of Departmental Appeal	"C"	12-16
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APPELLANT

Date 12/11/22

Through

(Sardar Muhammad Asif)

&

(Muhammad Asjad Pervaz Abbasi) Advocates, High Court Abbottabad

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

Saiqa Idress Teacher Government Girls Primary School Bagdo 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:**



- 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.
- 6. 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.

Date 17/11/22

Through

(Sardar-Muhammad Asif)

-\&

(Muhammad Asjad Pervaz Abbasi) Advocates, High Court Abbottabad

## **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



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

Saiqa Idrees R/o Teacher Government Girls Primary School Bagdo Torghar.

...APPELLANT

V/S

Secretary Elementary and Secondary Education & Others
...RESPONDENTS

## **AFFIDAVIT**

I, Saiqa Idrees R/o Teacher Government Girls Primary School Bagdo 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 (1//2

**DEPONENT** 

OFFICE OF THE MISTING POUGATION OFFICE PRICE PROBLET TOUR GHAR MAIL

OFFICE OF THE MISTING POUGATION OFFICE PRICE PRICE PROBLET TOUR GHAR MAIL

OFFICE OF THE MISTING POUGATION OF THE PRICE PRI

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 morit having the prescribed qualification in BPS 12(16.7000 - 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" District Tor Ghar

S.No	Candidate NAME	Father's Name	Tappa	Quaif:	Score	School/Station where posted	Zone	Remarks
1	Sumaira Gui	'Muhammad Ismaeel	Hassan Zai	BA	42.41 -	GGPS Mareer (HZ)	Summer	Against V /P
2	Farzana Habib	Habib Khan	Bassikhail	BA	42.38	GGPS Gul Dheri (BK)	Summer	
3	Saba Gul	Shah Jahan	Mada Khail	BA	42.05	GGPS Maira Mada Khail	Summer	Aguinst V /P

## "Open Merit" Adjacent Districts

		<u> </u>		<del></del>	—т			
S.N	Candidate Name	Father's Hame	Domicile	Qualf:	Score	School/Station where Posted	Zone	Remarks
1	Ayesha HunimasSwati	Muhammad Shauket	-Mansehra : '	MSc	77.88	GGPS Palosa (HZ) - ↓€	Shulbiet	Against V //>
2	Adeela Shaultat Swali	Muhammad Shaukat Khan	Mansehra	MSc	75.70	GGPS Garbi (NZ)	<sup>45</sup> s, Summer	Against V /P
3	Faiza Tabassum	Muhammad Bashir	Mansehra	MSc	75.65	GGPS Geeto (BK)	Winter	Against V /P
, (54) (51) (51)	Aisha Bibi 🎌	r Fagir Muhammad	Mansehra	- MScVIII	ζ <u>5</u> :06	GGPS Kand Bala (BK)	- รูงกากเยา	Äğsirist M /P
5	Nosheen Kanwal	Sikandar Hayat	Mansehra	MA ( ,	65.80	GGPS Gul Dairee (BK)	Summer	Against V /P
6	Phool Bibl.	Muhamad Farooq	Mansehra	MA	64.11	'6 SPS Zeezari (BK) 🖘	Summer	Against V /P
• 7	Raham Bibi	Zamanal Khan	. Shangla :	BSc	£3.78	GC PS Khadang (AZ)	Summer	Against V /P
8	Safia Bibi	Syed Sultan Shah	Mansehra	. WV	63.13	GG 25 Kand Paayeen (AZ)	Winter	Against V /P
9	«Sadia:Shoakat	Muhanimad Shoukat	Mansehra	MA	62.64	GG 25 New Killay (HZ)	Summer	Against V /P
10	Bibi Saceda tun Nisa	Oari Abdul Rashid	Mansehra	MA	√51: <b>80</b>	GGPS Bimbal (AZ)	Summer	Against V /P

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.

## "Tappa Wise District Tor Ghar

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

#### "Open Merit" Adjacent Districts

S.No	Candidate Name	Father Name	Domicilo	Qualf	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	Faqir Muhammad	Mansehra	MSc	75.00	GGPS Kanda Bala (8K)	Summer	Against V/P
5.	Nosheen Kanwal	Sikander Hayat	Mansehra	MA	65.80	GGPS Gul Dairee (BK)	Summer	Against V/P
6	Phoof Bibi	Muhammad Farooq	Mansehra	MA	64.11	GGPS Zeezari (BK)	Summer	Against V/P
7	Raham Bibi	Zamanat Khan	Shangla	BSc	63.78	GGPS Khadang (AZ)	Summer	Against V/P
8	Safia Bibi	Syed Sultan Shah	Mansehra	AM	63.13	GGPS Kand Paayeen (AZ)	Winter	Against V/P
9	Sadia Shoakat	Muhammad Shoukal	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 Bimbál (AZ)	Summer	Against V/P
11	Sobia Bibi	Abdul Hamid	Mansehra	MA	58.74	GGPS Bimbal (AZ)	Summer	Against. V/P
12	Rama	Aurangzeb	Mansehra	M.A	58.64	GGPS Judba	Summer	Against V/P
13				! !				Against V/P
14	Zahirat Bibi	Rahim Shah	Shangla	BSc	58.00	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 Bibi	Abdul Qayyum	Mansehra	BSc	53,52	GGPS Arbay Jalband (AZ)	Winter	Against V/P
18	Farheena Ali Akbar	Ali Akbar	Mansehra	MA	55.42	GGPS Murala (AZ)	Winter	Against V/P
19	Pari Had	A <b>n</b> iullah		MA	55.17	GGPS Khanday (BK)	Winter	Agains\//P

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	51	Rubi Islamul Haq	Islamul Haq	Mansehia	MA	51.10	'GGPS flour Payeen (BK)	Summer	Ayaic
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	56	Naila Bibi	Sain Muhammaad	Mansenta	MA	50.01	GGPS Ormal (IIZ)	Summer	', Again
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	58	Bibi Salma Naghar	S.Pir Azəm Shah	Manselva	MA .	49.72	GGPS Savey Narange (AZ)	Winter'	Again
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2	60	Seiga Idrees	Muhammao Adrees	Mansehra !	- MA	19.27	GGFS Bugdo (H2)	Summer	Agaitr
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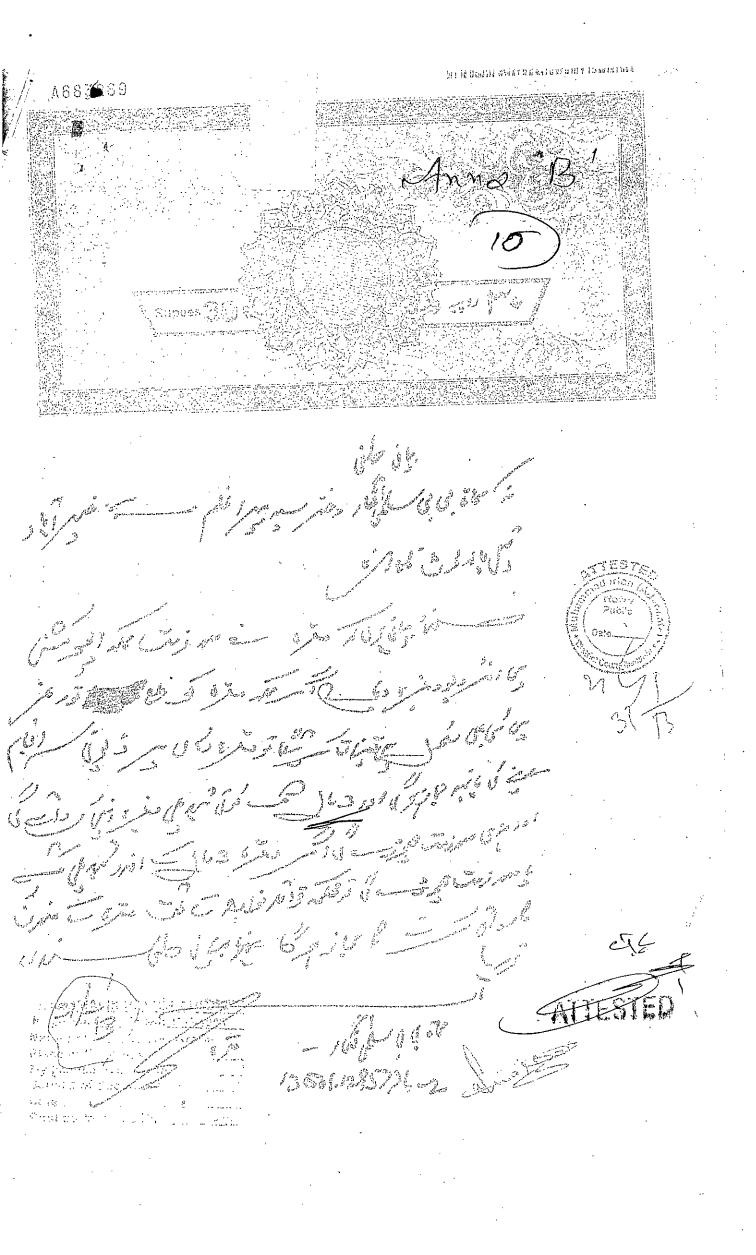
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58	Bibi Salma Nigar	S.FII AZam Shan	manocino			(AZ)		VIP
59	Rafat	Nasir Uddin	Shangla	MA	49.37	GGPS Sorai (BK)	Winter	Against V/P
60	Saiqa Idrees	Muhammad Adrees	Mansehra	MA	49.27	GGPS Bugdo (HZ)	Summer	Against V/P
61	Roobina Bibi	. Sherin Zeb	Shangla	MA	48.88	GGPS Noor Kaleem (BK)	Winter	Against V/P
62	Bibi Farzana Rehman	Noor ur Rehman	Mansehra	MA	45.87	GGPS kalsoona (Mk)	Winter	Against V/P
63	]	Mir Afzal	Mansehra	MA	47.07	GGPS Bugdo (HŽ)	Summer	Against V/P
64	Tanzeela Aman	- Malik Aman	Mansehra	MA	47.81	GGPS Chirakot (MK)	Summer	Against V/P
65	Naseem Akhter	Qari Abdul Rehamn	Mansehra	8A	47.80	GGPS Chirakol (Mk)	Summer	Against V/P
66	Sharəfat Bibi	Baktiyar	Shangia	BA	47.73	GGPS Noor Kaleem (BK)	Winter	Against V/P
67	Diished Begum	Hayai Ullah	Mansehra	BA	47.00	GGPS Simlai (HZ)	Winter	Against V/P
68	Bibi Tayyab	Muhammad liyas	Mansehra	BA.	47.64	GGPS Bando Dost Muhammad (AZ)	Summer	Against V/P
69	haila Waqar	Waqar Ahmed	Mansehra	BA	47,54	GGPS Balkot (NK)	Summer	Against V/P
70	Shabina Shezadi	Muhammad Haroon	Mansehra	MA	47.30	GGPS Kamal Banda (MK)	Summer	Against V/P
71	Sahira Bano	Khān Sardar Khāri	Mansehra	BA	47.20	GGPS Kand payee (AZ)	Winter	Against V/P
72	Adiba Afza!	Muhammad Afzal	Mansehra	BA	46.64	GGPS Khadang (AZ)	Summer	Against V/P
73	Shamaila Hussain	Muhammad Hussain	Mansehra	BA	46.77	GGPS Doga (MK)	Summer	Against V/P
74	Salma Bibi	Khan Aurang Zeb	Mansehra	BA	46.75	GGPS Doba (Mk)	Summer	Against V/₽
75	Haseena Bibi	Muhammad Pervez	Mansehra	BA	46.72	GGPS savey Narang (AZ)	Winter	Against V/P
76	Shamim Akhter	Abdul Karim	Shengle	MA	46.59	GGPS Ormal (HZ)	Summer	Against V/P
77	Momina Bibi	Sultan-e-Room	Shangla	BA	46.61	GGPS Deri Kaka Khail (BK)	winter	Against V/P
78	Bibi Javeria	Abdul Aziz	Mansehra	BA	49.55	GGPS Daro (AZ)	Winter	Against V/P

#### Disable Quota (02%)

1	Nakhtar Begum	Mutabar	Shangla	FA	31.26	GGPS Baddar (BK)	Summer	Against V/P
2	Rabia Bibi	Muhammad Saeed	Shangla	FA	28.78	GGPS Kander (Bk)	Summer	Against V/P

### TERMS AND CONDITIONS:-

- 1. Their services will be considered regular but without pension & gratuity in terms of section-19 of the NWFP Civil Servant Act, 1973 as amended vide NWFP Civil Servants (Amendment) Act, 2005 they will however be entitled to contributory Provident Fund in such a manner and at such rates as prescribed by the Government.
- 2. The appointees who are already in Govt: service and working against a pensionable post on regular basis before 1<sup>st</sup> day of July 2001 without any service break, on application to the Competent Authority/this office through proper channel are appointed and allowed choice of option either to retain benefit of pension and gratuity as allowed to them under their previous.



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مران در المالی! معاندا بیل المالی ال

مودباندگزارش کی جاتی ہے کہ <u>201</u>3ء میں ضلع مانسمرہ سے ضلع تو رغر تعینات کئے گئے تھے۔اس شرا نظے ساتھ کہ جمیں تین سال بعدا پے ضلع ٹر انسفر کر دیا جائے گا۔ گر گیارہ سال ہونے کو ہیں اور جمیں ٹرانسفر ٹیمیں کیا جار ہا۔

جبکہاں دوران 145 ساتذہ اور ضلع تو رخرہے تعلق رکھنے والی اساتذہ سفارش اور اعلیٰ تعلقات کی بناء پر اپنے اصلاع ٹر اسفر ہو چکی ہے۔ بیرسب آپ کے علم میں ہے۔

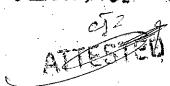
جناب عالی! (Female) DEO (Female) و عده کیاتھا کداب ایک یا دو ٹیچرز تورغرے ٹرانسفر نہیں ہوگئی۔ بلکہ آپ سب کوایک ساتھ ٹرانسفر کیا جائے گا۔ جبکہ شازید زیب ہی جی پی ایس سر بگواور رضواند جی جی پی ایس شوکائی صلح انہم ہو اور ایسٹ آبدا ٹرانسفر ہو چکی ہیں۔ کیاان کے جناب سے Staff Gap نہیں ہوگا؟؟ کیاسکول بند نہیں ہو گئے؟ کیا کی نہیں ہوگی؟؟؟

جاب عالى!

ہم تو آپ سے انساف کی امید نگائے ہوئے ہیں جبکہ ہمارے ساتھ کھیل کھیلا جارہا ہے۔ شازید زیب Appoint ہوئی مگران Appoint ہوئی مگران کی المید نگائے ہورہی۔ سمیابی بی 4016ء میں Appoint ہوئی مگران کی فرانسفر کو بھی سال گزر چکا ہے۔ اوراس ساتورغر ڈو میں کی ہولڈ تھیں۔ س قدرزیا دتی کی جارہی ہے۔ ہمارے ساتھ اس کے ہمارے یاس کوئی بوی سفارش نہیں؟؟

جناب عالی! صلح مانسمرہ سے بھرتی ہونے والی چند اساتذہ کوسکیل 14 دیا گیا ہے جس میں شرط بید کی گئی تنی کدا کرسکیل 14 لیکھے تو شرائسفری صورت میں ہمپ کوسکیل 14 اسکے کی اگر سکیل 14 لیکھے تو شرائسفری صورت میں ہمپ کوسکیل 14 میں کہ اندازہ اس بات سے لگایا جا سکتا ہے کہ ہم نے تعلیمی قابلیت ہوئے کے باقد اور کی میں کا ندازہ اس بات سے لگایا جا سکتا ہے کہ ہم نے تعلیمی قابلیت ہوئے کے باوجود سکیل نہیں لیا کیونکہ ہمارے کھر بلوطالات بہت زیادہ خراب بین ہمارے نیچ دوسروں کے رحم وکرم پر بل رہے باوجود سکیل نہیں لیا کیونکہ ہمارے گھر بلوطالات بہت زیادہ خراب بین ہمارے نیچ دوسروں کے رحم وکرم پر بل رہے۔

جناب عالى! تى تى كى نيى چاہيا اگر بىم اپنے كروں سے ديونى يرقرار كھ كتے تو بىم سكيل 14 لازى ليتے



ر کھر / 11سالوں ہے ہم سکیل 12 میں ہی ڈیوٹی کررہے ہیں۔

جناب عالی! آپ کے پاس اپنے سکول چلانے کیلئے گئ اور راستے ہیں ہماری زندگیاں قربان کرنے کا راستہ
کیوں؟؟؟ ہم ساری زندگی تو رغر کے نام نہیں کر سکتے۔ ہمارے بیچ دوسروں کے رحم وکرم پر رہ رہے ہیں۔
ہمارے گود کے بیچ آئے روزئ نئ بیماریوں میں مبتلا ہو گئے ہیں اور آپ ان تمام باتوں سے بخوبی آگاہ ہیں۔
لہذا تمام ٹیچرز کا آپ سے پروز ورمطالبہ 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 تن کے لیے کریں گے۔ ضلع مانسم ہے سیکن رکھنے والی اسا تذہ کے نام مندرجہ ذیل ہیں۔

المرقوم:2023-07-20

20-07	امروم: 2023			
	13501-1295774-2	جی جی پی ایس بمبل	بى بى كىلى نگار	_
Dala a	13503-0491117-0	جى جى بى اي <i>س كرنل ح</i> سن زئى	رابعه خاتون	_
0 20	13501-3879556-0	جي جي پي اليس بگدو	سلت صاعقته	-14
	/ 13501-9098694-6 13503-5580290-8	تی جی پی ایس جلبنگ	ناكله بي بي	لم
MO	/ 13503-5580290-8	جي جي پي ايس كمال بانڈه	بشره بي بي	_0
San	^ <sup>0</sup> ~13504-7245998-6	جى جى پي اليس بانله ه دوسية جي	صائمه بی بی	
	-	·	تنزيلهامان	_2
<b>1</b> 22	13501-12898	جی جی پی الیس اور مل 🕜 – 🖔	نائله بي بي	_^
2)*	13504-948480	ا بى بى بى ايس لورى ١- ١	روبينه بي بي	_8
Taluan	13504-169173	جي جي ٻي ايس ڪرهي جد به 🖾 🛫 🖟	طاہرہ بی بی	_ _
Shang	× 13503-188484	جی جی پی ایس کنوے کا - ۱۶	شهنازبی بی	_11
du	43毫01-85729818	جى جى بي ايس فلوية الريارنج	سعد بيه في في	<b>&gt;</b> **
San	13504-057483	🤇 جي جي کي ايس موراتان 🔾 - 🗞	صائمه الله حاثور	_114
Earlier	12503-949386	٢ - ١٥ ي ي ايس لنڌ يا عين ٢ - ٦	فرينه بي بي	امار
	-0-101	جي جي لي اليس مرادو	صفيه بي بي	_10
Sir	is a constant	8. S. S. J. J.	Jun J	te
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معاد الله على PST BPS-12 بي PST BPS-12 بي الماري المرابع الماري المرابع الماري المرابع الماري المرابع الماري المرابع عرت يولي أمر من الأرفر عن الأنتى تعلي قاليت المراس يحداد عالم . B.Ed و PTC ب- ماري فلع تورخ من 11 سال كمل مو ي ماري ماري أن ال شرطي كالكالق فرس بم تنهال كارز ي بعدا في والنوش المعالي والنوش المعالى والمعالى والنوش المعالى والمناس المناس المن エレ1201上声 2025日からからかいしたしいいで MOCに大き -cellingsta

to si Drichor +

جىسال كانووى 2013وسى برنى بوتونى دى توكوك 14 دياكى ب ال مل شرط رکی تی تی ارسیل 14 لیگ تو آپ کوشاخر کے بعد دولمہ، سمیل 14 Refuse كرياد المعالية المعالي اللاستها المعالم المراس المراس المراجع رَقَ مَنْ عَلِي الربم إن كرون عدودة ولا المحقة ومعلل الله المالية 2013 كام ف جد مطاعة إلى والدونة 2013 كام ف جد مطاعة إلى والدونة 2013 كام ف

لهذاله جاب عاشها عكرو المدايك فالفرق الفرق المراقع مالا قرالا جا ع من NOC فرام ی جائے کے مارے ای آپ کے ملاح کی فی حق عدَّلُ اللهُ آب على الساف وياجائ ممام عرد عا كوري كا علاور الذي كيك يم عافى لق ركة بن اكرم \_ يبلكونى محتى تعيد يال عدا المنفر موكرندكي ق 

لهذامها في فرما كرهارى ورخواست يرقو كياجا ي

July Wille







## KHYBER PAKHTUNKHWA

BLEMENTARY & SECONDARY EDUCATION DEPARTMENT

No. <u>SO E&SED (P/F)2-1/Torghar/2023</u>

Dated Peshawar, the 24th July, 2023

nn Fey

The Director,

E&SE Khyber Pakhtuokhwa;

Peshawar.

Subject: - .

DEPARTMENTAL APPRAL

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 Nugar GGPS Bembal District Torghar and others for submission of views/comments within 07-days positively for further processing of the case accordingly.

Early As above.

SECTION OFFICER APPE

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2. Master File.

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# GOVERNMENT OF KHYBER PAKHTUNKHWA ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

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

T co

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 Torghar 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)

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