FORM OF ORDER SHEET

Court of	
,	
· Appeal No.	2521/2023

	<u>A</u> pr	peal No. 2521/2023
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. Tahira 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. Tahira 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 incompletion and incomplete on the appellant for completion and incomplete on the appellant for completion and incomplete on the appellant for complete on the appellant for the appel

- 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. 3635 /S.T.

Sardar-Mühammad Asif Adv. High Court A.Abad. REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Removed 31

Removed 51

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BEFORE THE SERVICE TRIBUNAL KHYBER PAKTUNKHWA PESHAWAR

Appeal No.____/2023

Tahira R/o Teacher Government Girls Primary School Ghai Judba Torghar.

Khyber Pakinuk Service Tribunal

Diary No. ...

Dated 20 11-2023

V/S

- 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.

Registrillis

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

BEFORE THE SERVICE TRIBUNAL KHYBER PAKTUNKHWA PESHAWAR

Appeal No.____/2023

Tahira Teacher Government Girls Primary School Ghai Judba Torghar R/o Torghar

...APPELLANT

. V/S

Director Elementary and Secondary Education & Others ...RESPONDENTS

SERVICE TRIBUNAL

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4	Copy of Departmental Appeal	"C"	11-15
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...APPELLANT

Date 17/11/23

Through

(Sardar Muhammad Asif)

(Muhammad Asjad Pervaz Abbasi) Advocates, High Court Abbottabad



PAKTUNKHWA PESHAWAR

Appeal No._____/2023

Tahira Teacher Government Girls Primary School Ghai Judba 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.
- 7. 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:-

- 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.
- 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.

عام المركبات. APPELLANT

Date / H// 23

Through

(Sardar Muhammad Asif)

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(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.

Alulas

APPELLANT



Appeal No.____/2023

Tahira R/o Teacher Government Girls Primary School Ghai Judba Torghar.

...APPELLANT

V/S

Secretary Elementary and Secondary Education & Others ...RESPONDENTS

AFFIDAVIT

I, Tahira R/o Teacher Government Girls Primary School Ghai Judba 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. 17/11/77

...DEPÔNENT

OFFICE OF THE MISTING POUGATION OFFICE PROBLET TOUR GHAR MAIL
OFFICE ORDER/APPOINTMENT

Consequent upon the recommendation/ approval of the District selection Committee Tor Ghar in its meeting field 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(na.7000 - 500-22000) plus usual allowances as admissible under the rules against the variant 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

			T						• 1
	SIND	Candidate NAME	Father's Name	Таррэ	Quail:	Score	School/Station where posted	Zone	Remarks
ļ	· 1	Sumaira Gul	Muhammad Ismaeel	Hassan . Zai	BA	42.41	CCPC No.		
	2	Farzana Habib	Habib Khan	Bassikhaji	BA	42.20	GGPS Mareer (HZ) ;. ;GGPS Gul Dheri (BK)	5tunmer	Against V /₽ Against V /₽
ł	_ 3[Saba Gul	Shah Jahan	Mada Khail	ВЛ	42.05	GGPS Maira Mada Khail	Summer Summer	
			.7				The state of the s	Lagringer	Against V /P

"Open Merit" Adjacent Districts

S.N			- <u> </u>		· 			
0	Condidate Name	Father's Name	Domicile	Qualf:	, Score	School/Station where Posted	7004	
1	Ayesha Humma Swatt	Muhammad Shaukat Khan	Mansehra	MSc	77.88	GGPS Palosd (HZ)	Zone	Remarks
Z	Adeela Shadkal Swati	Muhammad Shaukat Khan	Mansehra .	MSc	75.70	GGPS Garhi (UZ)	Sunitives.	Against V /P
3	Faiza Tabassum	Muhammad Bashir	Mansehra	MSc	75.65	GGPS Geeto (BK)	Sunmer Winter	^gainst V /Þ
5	Alsha Bibiyaa Hali Nosheen Kanwal	A solic Wind a wind a second	Mansehra	MSc	.(5.06-	GGPS Kandi Bala (OK)	Sunmer :	Against V /P
6	Phool Bible 1947	Sikandar Hayat :Muhamad Farooq	Mansehra Mansehra	MA	65,80	GGPS Gul Dairee (BK)	Summer	Against V /P
• 7		70-0-01/20	Shangla	MA BSc	. 1	G SP5 Zeezari (BK)	Sunimer	Against V /ア
8	Safia Bibi	Synd Sulley Chat	Mansebra	MΛ	63.78	Ge PS Khadang (AZ) 7	Summer	Against V /P
9	*Sadja:Shoakat	Muhammad Shoukat	Мапѕенга	MΛ	- , .	GG P5 Kand Paayeen (∧Z)	Winter	Against V /P
	Bibi Saeeda tun Nisa	Oari Abdul Rashid	Mansehra	MA		GG 25 New Killey (HZ)	Sunneer	Against V /P
	· · · · · · · · · · · · · · · · · · ·				61.80	GG PS Bimbal (AZ)	Summer	Against V /P



Office Order/Appointment

Consequent upon the recommendation approval of the district selection committee for 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

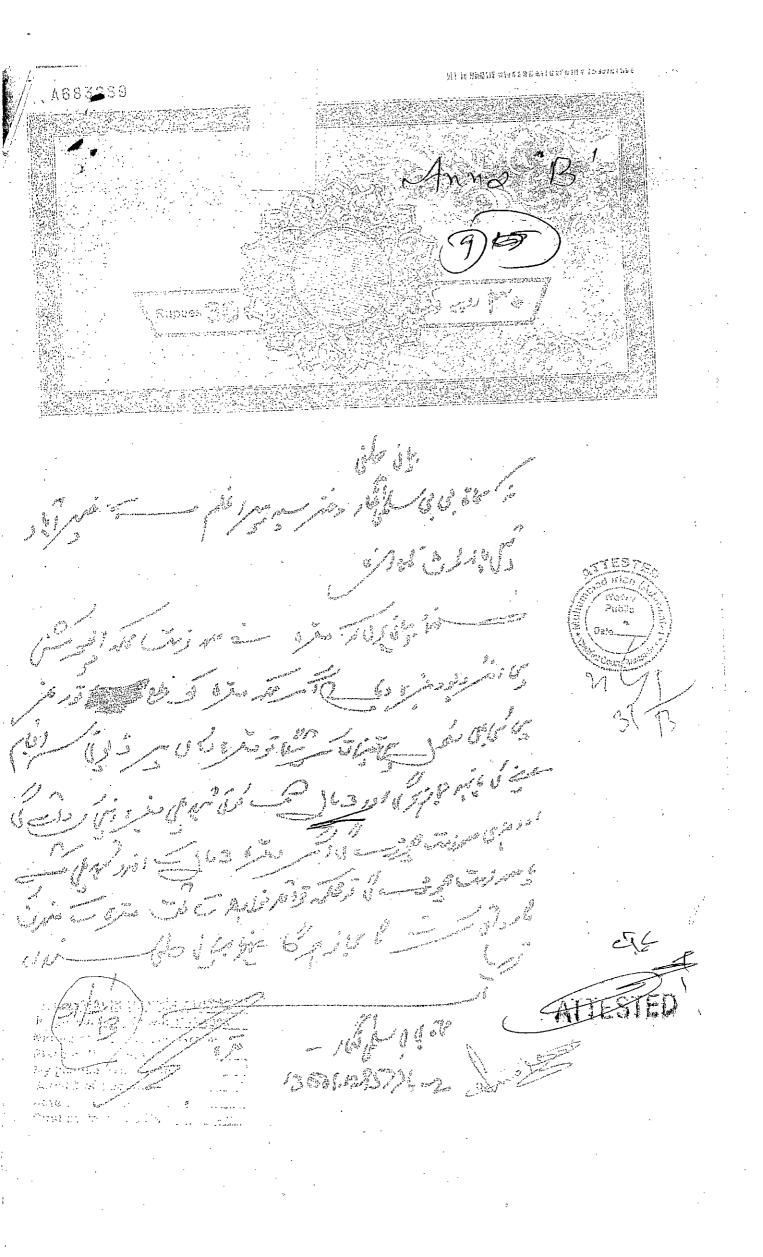
S.N	Candidate Name	Father Name	Тарра	Quaif	Score	School/Station	Zone	Remarks
0	•					where posted		
. 1	Sumaire Gul	Muhammad Ismaeel	Hassan Zai	BA	42.41	GGPS Mareer (HZ)	Summer	Against V/P
2	Farzena Habib	Habib Khan	Bassikhail	BA	42.38	GGPS Gut Dheri (BK)	Summer	Against V/P
3	Saba Gul	Shah jahan	Mada Khali	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	77.66	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 Blbi	Fagir Muhammad	Mansehra	MSc	75.00	GGPS Kanda Bala (BK)	Summer	Against V/P
5	Nosheen Kanwal	Sikander Hayat	Mansehra	MA	65.80	GGPS Gut Dairee (BK)	Şummer	Against V/P
6	Phool Bibi	Muhammad Farooq	Mansenra	MA	64.11	GGPS Zeezeri (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	MA	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 lun Nisa	Qari Abdul Rashid 🕏	Mansehra	MA	61,80	GGPS Bimbal (AZ)	Summer	Against V/P
11	Sobia Bibi	Abdul Hamid	Mansehra	MA	58.74	GGPS Bimbal (AZ)	Summer	Against V/P
12	Rabia	Aurangzeb	Mansehra	MA	58.64	GGPS Judba	Summer	Against V/P
13			-	_				Against V/P
14	Zahirat Bibi	Rahim Sh a h	'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 Youngs	Hazrat Younas Shangla MA 55.89 GGPS Cirapa Biratoni (BK)		VVinter	Against V/P		
17	Tahira Bibi			Winter	Against V/P			
18	Farheena Ali Akbar	Ali Akbar	Mansehra	MA	55.42	GGPS Murata (AZ)	Winter	Against V/P
19	Pari Had	Aniullah		MA	55,17	GGPS Khanday (BK)	·Winter	AgainsV/F

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•						0)		<u> </u>
نهر	เกทโล สิเอ๊ะ	Abdul Hemid	Минявіна	MA	.58.74	GFS Rimbel (AZ)	Summer	Against V /P
i	Ni Ja K	Aurang Zeb	Menorbia	1.67.	66.64	iGPS fielha Be B	Summer	Against V /P
		Muhampa J Ashed	Torghan		· · · · · · · · · · · · · · · · · · ·	-4 -		
	Suga: Sharetti	1-1130	<u>۔ اِ خطابہ سنہ</u> ا		Bn.01	SSPS Blito Banda (PX)	Surmi	Against V /F
4	Kahirsi Hibi	Fintelin Sheh	Standin	BG 1	55 00	GGP4 Limber (DF)	Steamini	Anainst V P
	Naviar เรือกรับแ	Muhanted Harron	ident obje	MAN	67.46	GOPS Gaugat (BZ)	Winter	Against V /P
6	Shagulla Bibl	Hazret Youngs	Shriigla -	MA	56.89	3GPS Chapra Bartoni (BK)	Villeter	Against V /P
7-	Yahira Bisi	Abdut Qayyam	Mansenta	65.	65.52	CBPS Arbay Jalbann ((AZ)	Winter	Against V /P
9	Ferheena Ali Akbar	Ali /kbar	Mansenra	- MA	55.42	GGPS Mocata (AZ)	Whoter	Against V /P
16	Pari Had	/\niullah	Shangia	MA	55.17	GGPS Khanday (BK)	Winter	Against V /F
20	gavaria	Mohammad (qhal	Mansehra	MA .	56.17	GGPS Kand Bala (BK)	Summer	Against V /P
21	Farah Bibi	Nascer ud Din Shah	Mansehra	MA	55.86	GGPS Talgram (HZ)	Winter	Against V /P
22	Jemila Bano	Durl Aman Qureshi	Mansehra	MA	55.44	GGPS Cheer (8K)	Summer	Agains! V /P
23	"Sumbal Bibl	Shamshei All	Shangla	MΛ	55.16	GGPS Khanday (BK)	Winter	Against V /F
24	Lubna Uroo;	Munawar Knan	Mansehro	MA	55,03	GGP1 Checr (BK)	Simmer	Against V /P
Ž.	Fârzana	- Habiburehman	Manathra	MA	51,93	GGPS Sunaray (HZ)	Sugaras	
- <u>:</u> -	Tallat Jabeen	Ashraf Khan	Mansehra	MA	54.73	GGPS Jatka Syedan (BK)	Summer	Against V /P
: 27	Agel Bibi	Gul Baz Khan	Shangla	- MA	54.60	GGPS Geeto (UK)	Winter	Against V /P
- 120	म् विश्वान विकेष		Shangla	AM	53,53	GGPS Kalish (BK)**;	Winter	Against V /P
~~5 <u>0</u> .	Roulna Bibl	Khawajawunammad	Mansehra	14/	53.42	GGPS Doba (MK)	Summer	Against VYP
₹30-	Maintaz Bagum	Saji-Gul	* Shangle	~ · M/\	53.01	GGP Buto Banda (BX)	Sumater	Against V /P
<u>[31</u>	Shamim Akhiar	Sultan Mahmood	Shangla	· WA-	52.86	- GGPS Kalish (BK)	Winter	/Against V /P
, 32	Shahnaz Bagum	Siar Khan	Shangla	MA	52.80	GGPS Lonia (BK)	Winter	Against V /P
	"Nazma"Skerin:	Masta Jen	Mansehra	MA	52.79	GGPS Chapra Judha (BK)	Summer	Against V /P J
37.	Bibi-Zalnab	Abilul Qayyum	Mansehia	BSc.	52.69	GGPS balkot (NK)	Summer	Against V /P
•	Shabana Keusar			MA			Winter	Against V /I ²
^\ - 36			Shangla	MΛ	52.6		Summer	Against V /Þ
	Sagina Gibi	- Ghulam Sawar Kho	10 Pagasabi	. MA			· Winter	Agallisi V-IP

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Anna Cro

عنوان - محماندا بالمرش صاحب المعمر ی ایند سکیندری ایجویش بشاور

جناب عالى!

مودباندگرارش کی جاتی ہے کہ 2013ء میں ضلع مانسہرہ سے ضلع تو رغر تعینات کئے گئے تھے۔اس شرائط کے ساتھ کہ جمیں نین سال بعدا پیضلع ٹرانسفر کر دیا جائے گا۔ گر گیارہ سال ہونے کو ہیں اور جمیں ٹرانسفر ٹیس کیا جارہا۔

جبکہ اس دوران 45 ساتذہ اور صلع تو رغر ہے تعلق رکھنے والی اساتذہ سفارش اور اعلیٰ تعلقات کی بناء پر اپنے اصلاع ٹر اسفر ہوچکی ہے۔ بیرسب آئی کے علم میں ہے۔

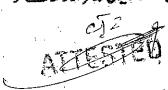
جناب عالی ا (Female) DEO (Female) و رغرنے ہم ہے وعدہ کیا تھا کہ اب آیک یا دو ٹیچرز تورغرے ٹرانسفر نہیں ہوگئی۔ بلکہ آپ سب کوایک ساتھ ٹرانسفر کیا جائے گا۔ جبکہ شازیہ زیب جی جی بی ایس سر بگواور رضوانہ جی جی ایس شوکائی ضلع مانسمرہ اور ایب آبدا ٹرانسفر ہوچکی ہیں۔ کیا ان کے جنا ہے ہے Staff Gap نہیں ہوگا؟؟ کیا سکول بند تہیں ہوگا؟؟ کیا سکول بند تہیں ہوگا؟؟ کیا سکول بند تہیں ہوگا؟؟ کیا سکول بند

جناب عالى!

ہم تو آپ سے انصاف کی امید لگائے ہوئے ہیں جبکہ ہمارے ساتھ کھیل کھیلا جارہا ہے۔ شازید زیب مرز آسفر ہم ہے ہم تو آپ میں امید لگائے ہوئی مرز انسفر ہم ہے ہملے ہور ہی۔ مسیابی بی 2016ء میں Appoint ہوئی مران کی استان مرز انسفر کو بھی سال کرز چکا ہے۔ اور اس ساتو رخر ڈو میسائل ہولڈ تھیں۔ س قدر زیا دتی کی جارہی ہے۔ ہمارے ساتھ اس کیے ہمارے یاس کوئی بڑی سفارش نہیں؟؟

جناب عالی! صلع انهرہ سے بھرتی ہونے والی چند اسانڈہ کوسکیل 14 دیا گیا ہے جس میں شرط بید کھی گئ تھی کدا گرسکیل 14 لیا تو NOC نہیں دی جاسکے گی۔اگرسکیل 14 لینگے تو ٹرانسٹری صورت میں آپ کوسکیل 14 Regfuse کرنا پڑے گا۔ ہماری ہے بسی کا ندازہ اس بات سے لگایا جاسکتا ہے کہ ہم نے تعلیمی قابلیت ہوئے کے باوجود سکیل نہیں لیا کیونکہ ہمارے گھر بلوطالات بہت زیا وہ خراب بین ہمارے بیچ دوسروں کے رحم وکرم پر بل رہے باوجود سکیل نہیں لیا کیونکہ ہمارے گھر بلوطالات بہت زیا وہ خراب بین ہمارے بیچ دوسروں کے رحم وکرم پر بل رہے

جناب عالى! تق كے نيس چاہے اگر ہم اپ كروں سے ديوني برقرار ركھ كتے تو ہم سكيل 14 لازى ليے



11سالوں ہے ہم سکیل 12 میں ہی ڈیوٹی کررہے ہیں۔ (1 1 کے 1

جناب عالی! آپ کے پاس اپنے سکول چلانے کیلئے گئی اور راستے ہیں ہماری زندگیاں قربان کرنے کا راستہ کیوں؟؟؟ ہم ساری زندگی تو رغر کے نام نہیں کر سکتے۔ ہمارے بیجے دوسروں کے رحکم وکرم پررہ رہے ہیں۔ ہمارے گود کے بیچ آئے روزنی نئی بیماریوں میں مبتلا ہوگئے ہیں اور آپ ان تمام باتوں سے بخو بی آگاہ ہیں۔ لہذا تمام ٹیچرز کا آپ سے پروز ورمطالبہ ہیکہ ان ٹیچرز کی ٹرانسفر کورو کا جائے یا پھر ہم سب کوایک ساتھ ٹرانسفر

کیا جائے۔بصورت دیگر ہم عدالت کارخ کریں گے۔سیکرٹریٹ جائیں گے۔سکول بند کریں گے اور جومناسب ہوا

سیے حق کے لیے کریں گے ضلع مانسمرہ سے تعلق رکھنے والی اساتذہ کے نام مندرجہ ذیل ہیں۔

الرقوم: 2023-07-20 بي بي سلمي نگار جي جي بي ايس بمبل 13501-1295774-2 رابعه خاتون جي جي بي ايس كرنل حسن زئي 13503-0491117-0 Rabia جي جي ٻي اليس بگدو صاعقه 13501-3879556-0 جي جي بي ايس جلينگ نائله بي بي 13501-9098694-6 بشره بي بي جي جي جي ايس كمال يانڈه 13503-5580290-8 صائمه بي بي جي جي جي اليس بانڈه دوست څيه 3504-7245998-6 جى جى يى ايس دارو تنزيلهامان 13501-0421418-0 35.50 - 1204875-0 كا 13501-12048 . نا کله بی بی 13504-9484801-6 WAULUBUS.C. ۹۔ ﴿ روبینہ بی بی 13504-1691737 - 13504-1691 ^ا طاہرہ بی بی Shang 13503-1884845-4 2 50 S. B. شهناز بي تي سعد بير بي بي مائم في في في في الي موراتان م- 13504-0574838 كون الي موراتان موراتان موراتان مائم في في في في الي موراتان Farlur 13503-9493 867-4 vi jil vi 3.3. فرينه بي بي صفيه بي بي

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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 24th July, 2023

Τ̈́o

The Director,

E&SE Khyber Paklituskiwa,

Peshawar.

Subject: - DEPARTS ENTAL 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 Torghar and others for submission of views/comments within 07-days positively for further processing of the case accordingly.

Blieft As above.

SECTION OFFICERARIES

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PS to Secretary E&SE Department Kliyber Pakhfunkhwa-

2. Master File.

SECULO PORTOR MANAGEMENT





GOVERNMENT OF KHYBER PAKHTUNKHWA ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

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

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

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