### FORM OF ORDER SHEET

	Ар	peal No. 2516/2023
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. Bibi Salma Nigar 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. Salma Nigar, 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 resubmission within 15 days. 1. ✓ Check list is not attached with the appeal. 2 Appeal has not been flagged/marked with annexures marks. 3-VAddress 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. 363/ /S.T. Dt. 21-11 /2023. REGISTRAR SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR. Sardar Muhammad Asif Adv. High Court A.Abad. Willia Remove 861 x (jo) il Remond 2 ichail ليوان رس تهدوتي ما عا 5/12/13 Remond 3 /2 (201201 Remond y is is ! Removed 5 ; (i) 2011 Removed 6 i (0) jer! Remond & idisel alide Only Only 4 & by Delete Chistorial 812/2 Office Note: - Pagen Nos-17 to 25 which :
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No. 1 Secretary EASE has also been
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Appeal No.\_\_\_\_/2023

Salma Nigar R/o Teacher Government Girls Primary School Bimbal Torghar.

...APPELLANT

Knyber Pakhtukhwa Service Tribunai

V/S

Diary No. 9284

- 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.

**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** 

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Registr 2011/23

Appeal No. 1/6 /2023

Salma Nigar Teacher Government Girls Primary School Bimbal
Torghar R/o Torghar ...APPELLANT

V/S

Director Elementary and Secondary Education & Others ...RESPONDENTS

#### **SERVICE TRIBUNAL**

#### <u>INDEX</u>

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

APPELIANT

Date 17/11/23

Through

(Sardar Muhammad Asif)

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(Muhammad Asjad Pervaz Abbasi) Advocates, High Court Abbottabad

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

Salma Nigar Teacher Government Girls Primary School Bimbal Torghar R/o Torghar.

...APPELLANT

#### V/S

- 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:-

#### **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.



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 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

Salma Nigar R/o Teacher Government Girls Primary School Bimbal Torghar.

...APPELLANT

V/S

Secretary Elementary and Secondary Education & Others ...RESPONDENTS

### **AFFIDAVIT**

I, Salma Nigar R/o Teacher Government Girls Primary School Bimbal 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. 17/11/22

DEPONENT



OFFICE OF THE METRICA KONGATION OFFICE PLETON GHAR WOLLD OF THE METRICA KONGATION OFFICE PLETON GHAR WOLLD OF THE METRICA KONGATION OFFICE PLETON GHAR WOLLD OFFICE OFFICE PLANT OF THE METRICAL POINT OF THE METRICAL POINT OF THE METRICAL POINT OF THE METRICAL PRODUCTION OF THE METRICAL PRODU

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 OPS 12(Rs.7000 - 500:22000) plus usual allowances as admissible under the rules ogainst 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" Discrict Tor Ghar

5.No	Candidate NAME	Father's Name	Тарра	Quail:	Score	School/Station where posted	Zone	Remarks
1_1_	Sumaira Gul	Muhammad Ismaeel	Hasson · Zal	BA	42.41	GGPS Mareer (HZ)	Summer	Against V /P
2	Farzana Habib	Habib Khan	Bassikhail	BA	42.38	,GGPS Gul Dheri (BK)	Summer	Against V /5²
3	Saba Gul	Shah Jahan	Mada . Khail	ВА	42.05	GGPS Maira Mada Khail	Summer	Against V /P

#### "Open Merit" Adjacent Districts

В.И			1		ր	, , , , , , , , , , , , , , , , , , , ,	T	T
0	Candidate Name	Father's Name	Donstelle	Qualf:	Score	School/Station where Pested	Zone	Remarks
1	Âyesha Humma Swati	Muhammad Shauket Khan	Mansebra	MSc	77.88	GGP5 Palosa (HZ)	Summer	) Against V /P
2	Ādeela Shaukat Swati	Muhammad Shaukal Khan -	Mansehra	MSc 🗦	75.7C	GGPS Garh! (1:12)	Suntage 45	^gainst ∨ /P
3	Falza Tabassum	Muhammad Bashir	Mansehra	MSc	75.65	GGPS Geeto (BK)	Winter	Against V /P
-	Aisha Bibi	* Fagir Muliammad	Mansehra	MSc	<u>75.06</u>	5GPS Kand Bala (BK)	ารับกากเลา	AgairišLV. (P
5	Nosheen Kanwal .	Sikandar Hayat	Mansehra	ζMA ,	65.80	GGPS Gul Dairee (BK)	Summer	Λgainst V /P
6	Phool Bibi	Muhamad Faroog	Mansehra	MA	64.11	G GPS Zeczari (BK)	Summer'	Against V /P
7	'Raham Bibi	Zamanat Khan	Shangla	, BSc .	63.78	GC PS Khadang (AZ) 1	Summer	Against V /P
8	Safia Bibi	Syed Sullan Shah	Mansebra	MΛ	63.13	GGPS Kand Paayeen (AZ)	: Winter	Against V /P
9	*Sadia Shoakat	Muhammad Shoukal	Mansehra	,, MA	G2.64	GG 2S New Killay (HZ)	Sunmer	Against V /P
10	Sibi Saeeda tun Nisa	Oari Abdut Rashid	Mansehra	MA	61.80	GC PS Bimbal (AZ)	Summer	Against V /P

12

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

#### "Open Merit" Adjacent Districts

S.No	Çandidate 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 Kanwai	Sikander Hayat	Mansehra	MA	65.80	GGPS Gut Dairee (BK)	Summer	Against V/P
6	Phool Bibi	Muhammad Farooq	Mansehra	MA	64.11	GGPS Zeezari (8K)	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 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 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	Surnmer	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	GGP\$ Gangi (HZ)	Winter	Against V/P
16	Shagulia Bibi	Hazrat Younas	Shangla	MA	55.89	GGP\$ Cirapa Biratoni (8K)	Winter	Against V/P
17	Tahira Bibi	Abdul Qayyum	Mansehra	BSc	53.52	GGPS Arbay Jalband (AZ)	'vVinter	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/P

			; .		(8	( P)		· · · (4
		Mir Alcal	NZ W	E/MATE	學語	Geys Holido (Hz)	Summer	
	Tenegela Aman	Malik Aman	Manselpa	MA	47.81	GGVS Chirakot (MK)	Summer	Against V /P
2057=	maseen?Althlange //BX/c	Construction of the Constr	Managhar			GAPS CHICAGO (MK)	Summir	Against V /P
\$ 5	r Sharaial Bio 2 3	Barbara and Alexander		ZUPANA	7775s	GGRS Hong Kalnern (IIK)	Winter	Against V /P
A67.3	3Dilshail Grainness 727	Hayald Illah 2545 75	(周朝朝)宣	as was:	47.00%		Winter	Against V #
£687	REIDININA DE SANS PARTE	Muhammaullyns 45	Mariechie	Subject Subjec	23756年	PGGP: Randa Dost Mühanımadı(AZ)	Summer	Against V /P
69r	Nalla Wagar						Summer	Against V /P
厄	Ishie marshell and S	Muhanimad Hajoaji Khan		A EMATER	47.30	GGr5 Kamal Bailda (MK) Contraction	e Summer <sub>ja</sub> .	Medalusti VIII
	Sahira Banovayan			<b>EMPARK</b>	47,207	GGPS Kand Payeen (AZ)	Winter	Against V /P
72	Adiba Afzal	Muhammad Alzal	Mansehra	BA	46.84	GGPS Khadang (ÁŽ)	Summer	Against V IP
72	e eshanjalla Hüssain Live	Muhammd Hussain Khan	A Production	BAZ	76.77 46.77	GGFS TOORS TONK	Summour.	Against V 7P
70	Sálma-Bibi	TAURAS ZARTAS ELECTRAS	STATESTA	BETTIES IN		LIGGPS Doba (MK) CASSIL SANS ACC	A SAME	Agamst-V-III
75		Muhammad Pervez	Mansehra	BA	46.72	GGPS Savey Narang (AZ)	Winter	Against V /P
76	Shamim Akhtan 77 224	Abdul Kailing 1997	STEED OF	PUMA SU	746.697	4.GGPs Ofmal (HZ)	Summer	Against V /P
E.	Momina Bibly and It	T Sultan e Hoom	win Strangla	. BA		Koka Khail (BK)	Winter	Agalust V /P
	BIT TBIBITIAVANASS			BA W.W.	% <u>1</u> 45:59	GGFS Daro (AZ)	Winter	Against V /P

Disable.Quota (02 %)

					Agains: V /P	
		Shandlas FEARCHRON		Summer		
Nakhlais Begum san va						
			en reges Kandar (BK)			
					Anainsi V /P	
				Summer		
	CARRON COMPANY					
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#### 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 1st 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

						/		
58	Bibi Salma Nigar	S.Pir Azam Shah	Mansehra	MA	49.72	GGPS Savey Narangi (AZ)	Winter	Against V/P
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 (HZ)	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	BA	47.80	GGPS Chirakot (Mk)	Summer	Against V/P
66	Sharafat Bibi	Baktiyar	Shangla	ВА	47.73	GGPS Noor Kaleem (BK)	Winter	Against V/P
67	Dilshed Begum	Hayat Ullah	Mansehra	BA	47.00	GGPS Simlai (HZ)	Winter	Against V/P
68	Bibi Tayyab	Muhammad Ilyas	Mansehra	BA	47.64	GGPS Bando Dost Muhammad (AZ)	Summer	Against V/P
69	Naila Waqar	Waqar Ahmed	Mansehra	BA	47.54	GGPS Balkot (NK)	Summer	Against V/P
70	Shabina Shezadi	Muhammad Haroon Khan	Mansehra	MA	47.30	GGPS Kamal Banda (MK)	Summer	Against V/P
71	Sahira Bano	Sardar Khan	Mansehra	BA	47.20	GGPS Kand payee (AZ)	Winter	Against V/P
72	Adiba Afzal	Muhammad Afzal	Mansehra	ВА	46.84	GGPS Khadang (AZ)	Summer	Against V/P
73	Shamaila Hussain	Muhammad Hussain Khan	Mansehra	ВА	46.77	GGPS Doga (MK)	Summer	Against V/P
74	Salma Bibi	Aurang Zeb	Mansehra	ВА	46.75	GGPS Doba (Mk)	Summer	Against V/P
75	Haseena Bibi	Muhammad Pervez	Mansehra	ВА	46.72	GGPS savey Narang (AZ)	Winter	Against V/P
76	Shamim Akhter	Abdul Karim	Shangla	MA	46.59	GGPS Ormal (HZ)	Summer	Against V/P
77	Momina Bibi	Sultan-e-Room	Shangla	ВА	46.61	GGPS Deri Kaka Khail (BK)	winter	Against V/P
78	Bibi Javeria	Abdul Aziz	Mansehra	ВА	49.55	GGPS Daro (AZ)	Winter	Against V/P

#### Disable Quota (02%)

4	M-111 B						
1	Nakhtar Begum	Mutabar	Shangla	FA	31.26	GGPS Baddar (BK)	Cummos LAin-11/15
2	Rabia Bibi	Muhammad Carad					Summer   Against V/P
	TADIA DIDI	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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Pagens 45

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## Anna CB

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عوان: محكماندا يل\_

جناب عالى!

مودباندگزارش کی جاتی ہے کہ 2013ء میں ضلع مانسمرہ سے ضلع تو رغر تعینات کئے گئے تھے۔اس شرا کظے ساتھ کہ جمیں تین سال بعدا پنے ضلع ٹر انسفر کر دیا جائے گا ۔گھر گیارہ سال ہونے کو بیں اور جمیں ٹرانسفر نہیں کیا جارہا۔

جبکداس دوران 45 ساتذہ اور ضلع تو رخر سے تعلق رکھنے والی اساتذہ سفارش اور اعلی تعلقات کی بناء پر اپنے اصلاع ٹر اسفر ہو چکی ہے۔ بیرسب آپ سے علم میں ہے۔

جناب عالی! DEO (Female) وعدہ کیا تھا کہ اب ایک یا دو ٹیچرز تورغرے ٹرانسفرنہیں اس کا ایک اور میٹے رزقورغرے ٹرانسفرنہیں ہوگئی۔ بلکہ آپ سب کوایک ساتھ ٹرانسفر کیا جائے گا۔ جبکہ شازیہ زیب تی جی ایس سر بگواور رضوانہ جی جی ایس موگا ؟؟ کیا سکول بند شوکا ٹی شام ہو اور ایسٹ آبدا ٹرانسفر ہو چکی ہیں۔ کیا ان کے جنا سے Staff Gap نہیں ہوگا ؟؟ کیا سکول بند نہیں ہوگا ؟؟ کیا سکول بند نہیں ہوگا ؟؟ کیا سکول بند نہیں ہوگا ؟؟؟

جاب عالى!

ہم تو آپ سے انساف کی امید لگائے ہوئے ہیں جبکہ ہمارے ساتھ کھیل کھیلا جا رہا ہے۔ شازیہ زیب مرائد کھیل کھیلا جا رہا ہے۔ شازیہ زیب مرائد کھیل کھیلا جا رہا ہے۔ شازیہ زیب مرائد کھیل کھیلا جا رہا ہے۔ مرائد نظر ہم سے پہلے ہور ہی۔ سسمیا بی بی 2016ء میں Appoint ہوئی گران کی شار میں ساتھ رہے ہوں ہولڈ تھیں۔ س قدر زیادتی کی جاری ہے۔ ہمارے ساتھ اس کے ہمارے یاس کوئی بری سفارش نہیں؟؟

جناب عالیٰ! صلع مانسمرہ سے بھرتی ہونے والی چندا سائڈہ کوسکیل 14 دیا گیاہے جس میں شرط یہ کی گئ حتی کداگر سکیل 14 لیا تو NOC نہیں وی جاسکے گی۔اگر سکیل 14 لیکٹے تو ٹرانسفری صورت میں آپ کوسکیل 14 Regiuse کرنا پڑے گا۔ ہماری بے بسی کا ندازہ اس بات سے لگایا جا سکتا ہے کہ ہم نے تعلیمی قابلیت ہونے کے باوجود سکیل نہیں لیا کیونکہ ہمارے گھر بلوطالات بہت زیا دہ خراب ہیں ہمارے بیچ دوسروں سے رحم وکرم پر بل رہ ہیں۔

جناب عال! ترقی سے نیس چاہے اگر ہم اپنے گھروں سے ڈیوٹی برقرار رکھ کے تو ہم سکیل 14 لازی لیے



13)

11 سالوں سے ہم سکیل 12 میں ہی ڈیوٹی کررہے ہیں۔

جناب عالیٰ! آپ کے پاس اپنے سکول چلانے کیلئے گئ اور راستے ہیں ہماری زندگیاں قربان کرنے کا راستہ کیوں؟؟؟ ہم ساری زندگی تورغر کے نام نہیں کر سکتے۔ ہمارے بچے دوسروں کے رحکم وکرم پررہ رہے ہیں۔

ہمارے گود کے بچے آئے روزئ نی بیاریوں میں مبتلا ہوگئے ہیں اور آپ ان تمام باتوں سے بخو بی آگاہ ہیں۔
لہذا تمام ٹیچرز کا آپ سے پروز درمطالبہ ہمکہ ان ٹیچرز کی ٹرانسفر کوروکا جائے یا پھر ہم سب کوایک ساتھ ٹرانسفر
کیا جائے۔بصورت ویگر ہم عدالت کا رخ کریں گے۔سیکرٹریٹ جائیں گے۔سکول بند کریں گے اور جومناسب ہوا
سیخ ت کے لیے کریں گے۔ضلع مانسمرہ سے تعلق رکھنے والی اسا تذہ کے نام مندرجہ ذیل ہیں۔

الرقوم: 2023-07-20

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/ 1	e av	13501-1295774-2	جی جی بی ایس بمبل	کے بی بیسلنی نگار	
500.7	Raba	13503-0491117-0	جى جى بي اليس كرثل حسن زئى	رابعه خاتون	_٢
	Sign	13501-3879556-0	جی جی فی الیس بگدو	صاعقه	_µ
		13501-9098694-6	جی جی فی ایس جلبنگ	نا ئله بي بي	ام ـ
	NIG	13503-5580290-8	جی جی پی ایس کمال باعثره	بشره بی بی	_0
		^13504-7245998-6	بى جى بي ايس بانڈە دوسىية، محمد	صائمه بی بی	-*
:	6//	13501-0421418-0	جى جى بي ايس دارو د	تنزيليهامان	_4
		13501-128487	جی جی پی الیس اور طل 🕜 🥒	نائله بي بي	_^
		13504-9484801		روبینه بی بی	
	Talien	13504-1691737	جي جي بي ايس گرهي جد به ا	طاہرہ بی بی	_14
,	Shang	13503-188484	جی جی پی ایس کنڑے کا -ک	شهناز بی بی	_11
	Ju i	13801-85729818	جي جي ٻي اليس ڪلوية گرنارنج	سعدیہ بی بی	**
	San.	13504-057483	جی جی پی ایس موراتاں <sub>ص</sub> ے	صائمه بالم	_15"
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حب سال المسلم المحالي على الركبيل 14 ليك تو آب كوفرانس كي ووراده كيل 14 والما عدود والده كيل 14 والم على المركبيل 14 ليك تو آب كوفرانس كي ووراده كيل 14 الملك تو آب كوفرانس كي ووراده كيل 14 الملك تو آب كوفرانس كي ووراده كيل المركبيل 14 ليك تو آب كوفرانس كي ووراده كي ووراده كي المركبيل المرك

لبدامير بان فرمار كادر خواست بي فحد كياجات

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### GOVERNMENT OF

### MHYBER PAKHTUNKHWA

ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

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

Dated Peshawar, the 24<sup>th</sup> July, 2023

Τ,

The Director, E&SE Khyber Pakhtuckhwa, Peshawar.

Subjecti -

DEPARTMENT AL AFFEAL

bain directed to refer to the subject cited above and to enclose herewith a copy of scheephanatory of joint appeal a mainted by Bibi Salma Nagar GGI/S Bembal District Torghar and others for submission of views/comments within 07-days positively for further processing of the case becomingly.

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SECTIONOFFICER CONC.

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# GOVERNMENT OF KIYBER 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

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.

SECTION OFFICER (P/F)

