FORM OF ORDER SHEET

•	<u> </u>	2027/2025
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. Tanzeela Aman resubmitted
!	·	
		today by Sardar Muhammad Asif Advocate. It is fixed for
	·	preliminary hearing before touring Single Bench at A.Abad
	. 	on
	•	Dy the order of Chairman
		By the order of Chairman
		<u> </u>
		REGISTRAR
	·	
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The appeal of Mst. Tanzeela Aman 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- 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 if.
- 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. 3639 /S.T.

Dt. 21 - 11 /2023.

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

PESHAWAR.

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PAKTUNKHWA PESHAWAR

Appeal No.____/2023

Tanzeela Aman R/o Teacher Government Girls Primary School Daro Torghar.

...APPELLANT

Khyber Pakhtukhwa Service Tribunal

.V/S

Diary No. 9241

- 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.

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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

Tanzeela Aman Teacher Government Girls Primary School Daro 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 /7/11/23

Through

(Sardar Muhammad Asif)

&

(Muhammad Asjad Pervaz Abbasi)
Advocates, High Court
Abbottabad

BEFORE THE SERVICE TRIBUNAL KHYBER PAKTUNKHWA PESHAWAR

Tanzeela Aman Teacher Government Girls Primary School Daro Torghar R/o Torghar.

...APPELLANT

V/S

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

... RESPONDENTS

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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.
- 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 12/11/23

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.

BEFORE THE SERVICE TRIBUNAL KHYBER PAKTUNKHWA PESHAWAR

Appeal No.____/2023

Tanzeela Aman R/o Teacher Government Girls Primary School Daro Torghar.

...APPELLANT

V/S

Secretary Elementary and Secondary Education & Others ...RESPONDENTS

AFFIDAVIT

I, Tanzeela Aman R/o Teacher Government Girls Primary School Daro 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

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Consequent upon the recommendation, approval of the District selection committee Tor Ghar in its meeting bold 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 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" Discrict Tor Ghar

	•				·			
5.No	Candidate NAME	Father's Name	Tappə	Quail:	Score	School/Station where posted	: Zane	Remarks
	Sumaira Gul .	Muhammad Ismaeel	Hassan ·	BA	42.11	GGPS Mareer (HZ)	Summer	Against V /F
	Farzena Habib .	Habib Khan	Bassikhail .	BA	42,38	GGPS Gul Dheri (BK)	Summer	Against V /P
	Saba Gul	Shah Jahan	Mada . Khail	ВЛ	12.05	GGPS Maira Mada Khail	Summer	Against V /P

"Open Merit" Adjacent Districts

5.N	Candidate Name	Father's Name	Domicilo	Qualf: ,	Score	School/Station where Posted	Zone	Remarku
1	Ayesha Humma Swali	Muhammad Shauket	Mansehra	MSc 👸	्री कार प	-dors Paloso (HZ) ्रहरू	Sumpler	Against V /P
		Muhammad Shaukat	·	MSc		,	÷42'	
2	Adeela Shaultat, Swatter	Khan Walington Muhammad Bashir	Mansehra Mansehra	MSc	75.7C	GGPS Garhi (NZ)	Minter	Against V /P
1			Manseliya	MSc &	75.65 (75.06 75.06	GGPS Geeto (DK)	-Summer	Aşalıstv /P
5	Nosheen Kanwal	Sikandar Hayal	Mansehra	MA	65.80	(:GPS Gul Dairee (BK)	Summer	Against V /P
- 6	(Phool Biblish	Muhamad Farood	Mansehra	TIMA SE	64.11	G SPS Zeezari (BK)	Summer	Λgalnst V /P
7	Raham Bibl 3	Zamanal Khan	:Shajiigla:s	ALC: COM	\$63.78 ·	GC PS Khadang (AZ) 43	Summer	Against V /F
8	Safia Bibi	Syed Sullan Shah	Mansehra	MA	63.13	GG PS Kand Paayeen (AZ)	Winter	Against V /P
9	SadjaiShoakal Control	1		MA		. 	Summer	Against V /P
10	Bibi Saeeda tun Nisa	Oari Abdul Rashid	Manschra		61.80	GGPS Bimbal (AZ): (1945)	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	Candidate Name	Father Name	Tappa	Quaif	Score	School/Station	Zone .	Remarks
0.14	Constitution (Constitution)		''			where posted		
1	Sumaira Gul	Muhammad Ismaeel	Hassan Zai	БA	42.41	GGPS Mareer (HZ)	Summer	Against V/P
2	Farzena Habib	Habib Khan	Bassikhail	BA	42.38	GGPS Gui Dheri (BK)	Summer	Against V/P
3	Saba Gul	Shah jahan	Mada Khail	ВА	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 Swafi	Muhammad Shaukat Khan	Mansehra	MSc	77.88	GGPS Paiosa (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 Geetc (BK)	Winter	Against V/P
4	Aisha Bibi	Faqir Muhammad	Mansehra	MSc	75.00	GGPS Kanda Bala (BK)	Summer	Against V/P
5	Nosheen Kanwal	Sikander Hayat	Mansehra	MA	65.80	GGPS Gul Dairee (BK)	Summer	Against V/P
ß	- Phool Bibi	Muhammad Faroog	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	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 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	GGP\$ 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	iviansehra	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 Murata (AZ)	Winter	Against V/P
19	Pari Had	Aniullah		AM	55.17	GGPS Khanday (BK)	Winter	Agains V/P

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	gerl		Mir Altal	Majarglaja	MAY	47,077	Girshoud (UZ)?	Summer .	
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£67	<u> </u>	Diishiza Begurne (1985)	Hayald High To The S	SWEETING.	EN MARKE		÷ ៥៩៤៥នាមួយប្រែការ	Winter	Against V #3
£68		Biblinayaba a (Sasat	Muhammadilyas	Millightar	SALANE	747 61 7	GGP Bunda Dost Mühannag (AZ)	Summer	Against V IP
7.59	100 V	Näila:Waqat-ya-75-75	(WagarjAhmad, 1947)	Mansehra	BA BA	7.50 A	agges Balkot (NK)	Summer	Against V IP
í fil	聖	Shabina Shottadi 1223	Muhanimad Hajooli Khan		Section		· ·	MASSING STATES	- Ægainst <u>V</u> #P≇
. 10		SahliaiBanomme (15)	Sardar Khaha William	Mansehja	***BA	47:203	≂GGPS'Kand Payeen (ΛΖ)	Winter	Against V /P
72		Adiba Afzal	Muhammad Alzal	Mansehra	ВА	46.84	GGPS Khadang (AŽ)	Summer	Against V /P
7	350	Shameila Hussainy 116	Muhammd Hussaln Khan	T. S. Y.	PASSEAU V	5 6 46 77°	GGPS DOBS (MK)	Summer:	Ageinst V /P
-7	4	Sálma Bihi	Among Job	TANKS VIEW	DE BOBASSI	446.75	CGPS.Doba.(MK);SALSIA-PESSA	Summer:	Ngainsty, 42
	<u>জ্ঞুত</u> '5	Hascena Bibi	Muhammad Pervez	Manschra		46.72	GGPS Savey Narang (AZ)	Winter	Against V /P
	76	Shamim Akhlai	Abdül Kallını		MA	G (46:69	GGPS Ofmat((4Z)	Summer	Against V /P
	T(10)	Momina Bibi	1		1 00	1	S SGPS Offer Kaka Khail (BK)	Winter	Agains(V /P
		Taibinavariber of the			_		GGFŠ Daro (AZ)	Winter	Against V /P

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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

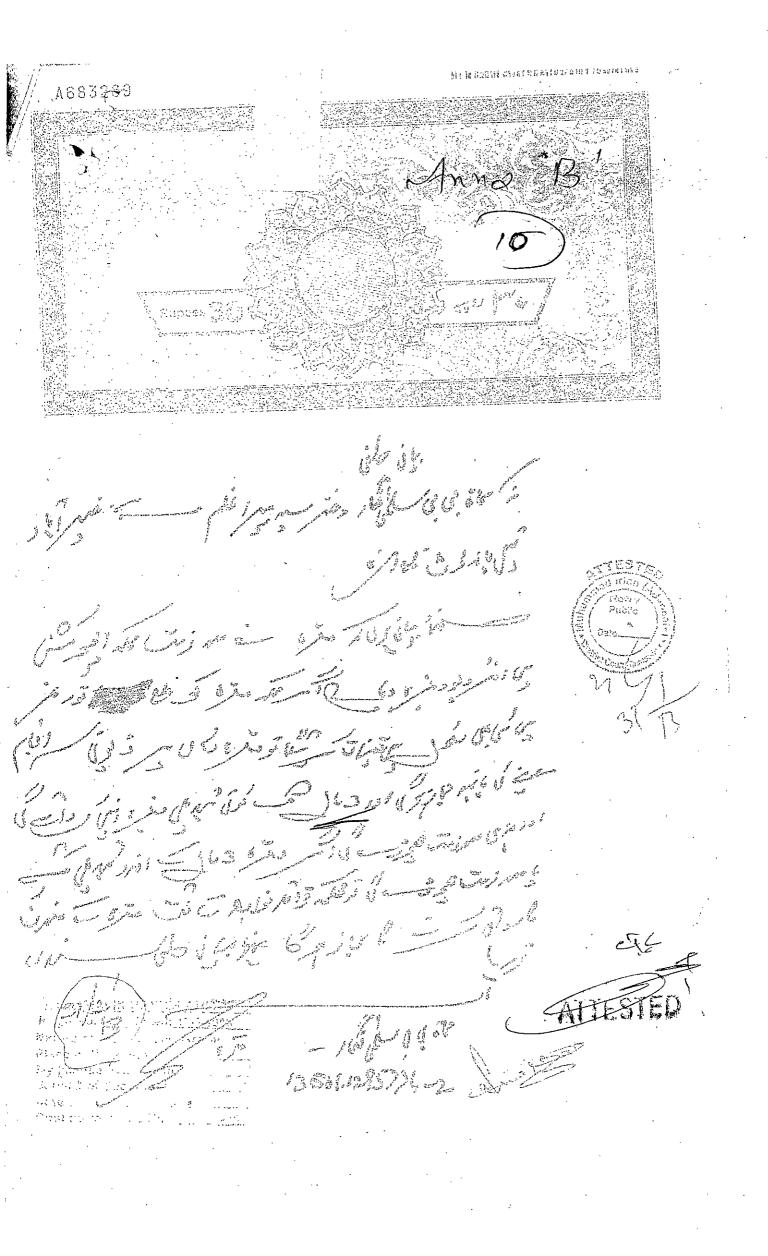
						₹ 1 /2 .		
58	Bibi Salma Nigar	S.Pir Azam Shah	Mansehra	MA	49.72	GGPS Savey Narangi (AZ)	Winter	Against ViP
59	Rafat	Nasir Uddin	Shangla	AM	49.37	GGPS Sorai (BK)	Winter	Against V/P
60	Saiga Idrees	Muhammad Adrees	Mansehra	MA	49.27	GGPS Bugdo (HZ)	Summer	Against V/P
61	Roobina Bibi	Sherin Zeb	Shangla	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	· Melik Aman	Mansehra	MA	47.81	GGPS Chirakot (MK)	Summer	Against V/P
65	Naseem Akhter	Qari Abdul Rehamn	Mansehra	₿A	47.80	GGPS Chirakot (Mk)	Summer	Against V/P
66	Sharafat Bibi	Bakliyar	Shangla	8A	47.73	GGPS Noor Kaleem (BK)	Winter	Against V/P
67	Dilshed Segum	Hayat Ullah	Mansehra	BA	47.00	GGPS Simlai (HZ)	Winter	Against V/P
68	Bibi Tayyab	Muhammad Ilyas	Mansehra	ВА	47.64	GGPS Bando Dost Muhammad (AZ)	Summer	Against V/P
69	Naîia Vvaqar	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	Sarder Khan	Mansehra	BA.	47.20	GGPS Kand payee (AZ)	Winter	Against V/P
72	Adiba Afzal	Muhammad Afzal	Mansehra	BA	46.84	GGPS Khadang (AZ)	Summer	Against V/P
73	Shamaila Hussain	Muhammad Hussain Khan	Mansehra	BA	46.77	GGPS Doga (MK)	Summer	. Against V/P
74	Salma Bibi	Aurang Zeb	Mansehra	BA	46.75	GGPS Doba (Mk)	Summer	Against V/P
75	Haseena Bibi	Muhammad Pervez	Mansehra	BA	46.72	GGPS savey Narang (AZ)	Winter	Against VIP
76	Shamim Akhter	Abdul Karim	Shangla	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	Bibì 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 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.



BETTER COPY

Pageno

ولا يك ميون مواوم مواوم المولين من المرولوم عير رباح

الرفي عقر ساق قور عبر عبد كسي جي سول من لها أو فقر ٥ و ما ١٠٠٠

الرور تري مع وترسي الرقع وقد الدر تبريل كم يا الروت

- The Distance - by

PILL A Will dask

13503-295774-2

مراب عالی!

مودباندگزارش کی جاتی ہے کہ 2013ء میں ضلع مانسمرہ سے ضلع تو رغرتعینات کئے گئے تھے۔اس شرائط کے ساتھ کہ جمیں تین سال بعدائے شلع ٹرانسفر کر دیا جائے گا گر گیارہ سال ہوئے کو ہیں اور جمیں ٹرانسفر نہیں کیا جارہا۔

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

جناب عالی! DEO (Female) و ترخ نے ہم ہے وعدہ کیا تھا کہ اب ایک یا دو نیچرز تورغ ہے ڈانسفر نہیں ہوگئی۔ بلکہ آپ سب کوایک ساتھ ٹرانسفر کیا جائے گا۔ جبکہ شازید زیب جی جی بی ایس سر بگواور رضوانہ جی جی ایس سر بگواور رضوانہ جی جی ایس شوکائی ضلع مانسم ہوگا؟؟ کیاسکول بند شوکائی ضلع مانسم ہوگا؟؟ کیاسکول بند شہیں ہوگا؟؟ کیاسکول بند نہیں ہوگا؟؟ کیاسکول بند نہیں ہوگا؟؟

جناب عالى!

ہم تو آپ سے انصاف کی امید لگائے ہوئے ہیں جبکہ ہمارے ساتھ کھیل کھیلا جا رہا ہے۔ شازیہ زیب مران Appoint ہوئی مران کے مور ہی۔ سمیابی بی 2016ء میں Appoint ہوئی مران کی استور کی مران کی استور کی مران کی کر انسفر کو بھی سال گزر چکا ہے۔ اور اس ساتور خر ڈو میسائل ہولڈ تھیں۔ س قدر زیا دتی کی جاری ہے۔ ہمارے ساتھ اس کیے ہمارے یا س کوئی بردی سفارش جیں ؟؟

جناب عالی! صلع مانسمرہ سے بھرتی ہونے والی چند اسانڈہ کوسکیل 14 دیا گیا ہے جس میں شرط یہ کھی گئ میں کہ اگر سکیل 14 لیا تو NOC نہیں وی جاسکے گی۔ اگر سکیل 14 لیکنے تو ٹرانسفری صورت میں ایپ کوسکیل 14 میں کہ ایک اندازہ اس بات سے لگایا جا سکتا ہے کہ ہم نے تعلیمی قابلیت ہونے کے باعد ویسکیل نہیں لیا کہ ویسروں کے رحم و کرم پر بل ارب باوجود سکیل نہیں لیا کیونکہ ہمارے گھر بلوطالات بہت زیادہ خراب بیں ہمارے بیج دوسروں کے رحم و کرم پر بل ارب بین ہمارے بیج دوسروں کے رحم و کرم پر بل ارب بین ہمارے دوسروں کے رحم و کرم پر بل ارب

جناب عالى! تى تى كى نيى چاہيا اگر بم اپ كرون سے ديونى يرقرار ركھ كے تو بم سكيل 14 لازى ليت



(3)

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

جناب عالیٰ! آپ کے پاس اپنسکول چلانے کیلئے گئ اور راستے ہیں ہماری زندگیاں قربان کرنے کا راستہ کیوں؟؟؟ ہم ساری زندگی تورغر کے نام نہیں کرسکتے۔ ہمارے بیچ دوسروں کے رحکم وکرم پردہ 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 ورمطالبہ ہمیکہ ان ٹیچرز کی ٹرانسفر کوروکا جائے یا پھر ہم سب کو ایک ساتھ ٹرانسفر کیا جائے۔ بصورت دیگر ہم عدالت کا رخ کریں گے۔ سیکرٹریٹ جائیں گے۔سکول بند کریں گے اور جو مناسب ہوا کیا جائے۔ بصورت دیگر ہم عدالت کا رخ کریں گے۔سیکرٹریٹ جائیں گے۔سکول بند کریں گے اور جو مناسب ہوا کیا جائے۔ بصورت دیگر ہم عدالت کا رخ کریں گے۔سیکرٹریٹ جائیں گے۔سکول بند کریں گے اور جو مناسب ہوا کیا جائے۔ بصورت دیگر ہم عدالت کا رخ کریں گے۔سیکرٹریٹ جائیں مندرجہ ذیل ہیں۔

المرقوم: 2023-07-20

•	<u>20-07-2</u>	اعروم:023		
· ./ .	= 2 al	13501-1295774-2	جی جی پی ایس بمبل	بى بىشكىنى نگار
A P	Q de Q	13503-0491117-0	جى جى بي ايس كرنا حسن زئي	٢- رابعه خاتون
,	July .		جي جي بي اليس بگدو	۳- صاعقہ
		13501-9098694-6	جی جی لیالیں جلبنگ	الم نائله في في
	N109	13503-5580290-8	جي جي بي اليس كمال بانڈه	۵- بشره بی بی
	Sarwi	[↑] ↑3504-7245998-6	جی جی پی ایس بانثه ه دوسته جمه	المراث صائمہ بی بی
÷.	G C		ی جی بی الیس دارو	كيست تزيلهامان
•		13501-12898	جی جی پی ایس اور طل 🕜 – 🖔	٨- ناكله بي بي
, .	Z.X. 4	13504-948480	الى تى تى يى الىس لورى السلولا	٩- روبينه بي بي
	Talun	12504-169175	جي جي جي ايس کر هي جديد 🚰 🛫 🎚	ا- طاہرہ بی بی
	Ehn neg	13503-188484	جی جی پی ایس کنوے 4-5	ا- شهنازنی بی
		43301-8572981.8	جى جى بى ايس كلوية المرنار خ	اللا سعديه بي بي
	San	13504-057483	جى جى بى ايس موراتان ٥- 8 ج	۱۳ مائمه کا وا کون
	tal her	12503-9493 86	ي بي بي پي ايس کنڌ يا ميں 4 – 7	المال فرینه بی بی
•		1 2 /	جي جي کي ايس مرادو 🤝 🤝	۱۵۔ صفیہ بی بی
	Sh	13503-7190636 CAC	جی کی بی اس کمبیر	in de
	1 · V		,	

معدیات آرای کے کہ ماری بحراق کے کہ اس کی تعلق کا ایک استان کے لیے۔ اس کی تعلق کا ایک استان کی تعلق کا ایک استان کی تعلق کا استان کی تعلق کی تعلق کا استان کی تعلق کی

مرسال المسلم المراكب المراكب

لیدا آپ جاب استها کا کوشر کو ایک استها کو در کو ایک آن آن ایک کوشر کو ایک آن آن آن آن آن آن آن کو کا کا کا کا ک ماروز بالا جائے کی NOC مراح کی جائے کی ایک آن کو ایک آن کی ایک آپ کے مطابق آن کی ایک آخری استها میس کا گری کا میں افسا ف دیا جائے میں اگر ہم ہے پہلے کو ایک گئے ہوئی ہے کا استماری کے ایک آن کی تھے ہوئی کی تاریخ و کو روا کا کو ایک کے میں اگر ہوئی کا کہ تھے ہوئی کی تھے ہوئی کی تاریخ ہوگر ایک تو ایک کا کہ تاریخ ہوگر ایک کے میں اگر ہم ہے پہلے کو تا تھی تھے ہوئی ہے کہ ایک کا کھی تھے ہوئی کی تھے ہوئی تی رکھ میں اگر ہوئی کا کہ تاریخ ہوئی تاریخ ہوئی کا کہ تاریخ ہوئی تاریخ ہوئی کا کہ تاریخ ہوئی تاریخ ہوئی

> ليدامر بانى فر ماكر مارى درخوات بي قديم المانى تغز ملي كامان (ميريت



GOVERNMENT OF KHYBER PAKHIUNKHWA

ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

(5)

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

To

The Director, E&SE Khyber Pakiitunkiiwa, Peshawar.

Subject: -

DEPARTMENTAL APPEAL

I am directed to refer to the subject cited above and to enclose herewith a copy of settle ephanatory of joint appear submitted by Bibi Salma Nagar GGPS Bembal District Torghar makeniness for submission of views/comments within 07-days positively for further processing of the ease accordingly.

English As above.

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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, 2023-11-30

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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