

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.**

S.A # 2211/2023

SHAHIDA PARVEEN..... Appellant

Versus

Govt of Khyber Pakhtunkhwa,
Through Secretary, Higher Education,
Khyber Pakhtunkhwa, Peshawar
& others.....

Respondents

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Respondents

(1)

BEFORE THE HONOURABLE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal # 2211/2023
Shahida Parveen.....

Appellant

**Khyber Pakhtunkhwa
Service Tribunal**

Versus

Govt. of Khyber Pakhtunkhwa
Through Chief Secretary
& others.....

Diary No. 10190
2-1-2024
Respondents

SUBJECT: PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO. 1-3

Respectfully Sheweth:-

Preliminary Objections:-

1. That the appellant has got neither cause of action nor locus standi to file the instant Service appeal.
2. That the appellant has not come to this Honourable Tribunal with clean hands.
3. That the appellant is trying to conceal material facts.
4. That the appellant is estopped by her own conduct to file the instant service appeal.
5. That the appellant has already completed her tenure at Govt. Girls Degree College, Gulshan Rehman, Peshawar

Reply on Facts:-

1. Correct to the extent. That the appellant was transferred to Govt. Girls Degree College, Gulshan Rehman, Peshawar vide notification dated 11.06.2021 **(Annex-A)**, rest of the Para pertains to record.
2. Pertains to record.
3. Pertains to record.
4. Correct. The appellant was transferred from Govt. Girls Degree College, Gulshan Rehman to Govt. Girls Degree College, Rustam, District Mardan vide notification dated 12.10.2023 **(Annex-B)** in best public interest. Moreover, tenure of the appellant at the said station stands completed.
5. Correct to the extent that respondents no.4 was transferred to Govt. Girls Degree College, Gulshan Rehman vide notification dated 12.10.2023. Rest of the para is incorrect as post in BS-18 and above are not subject specifics, rather the department posts incumbents as per demand.
6. Pertains to record.
7. That under section 10 of Civil Servant Act, 1973, a civil servant is liable to serve anywhere, where the competent authority posted/Transferred him/her.
8. As already explain in para 7.
9. Posting/transfer at one's own choice is not the vested right of the civil servant/appellant. It is sole prerogative of authority concerned.

- 10. Correct. Departmental appeal of the appellant was regretted as she has already completed her tenure **(Annex-C)**.
- 11. Incorrect, that the appellant submitted her departmental appeal dated 13.10.2023 **(Annex-D)** and the office of respondent No.3 forwarded the same to the office of respondent No.2 vide letter dated 18.10.2023 **(Annex-E)** but her departmental appeal was regretted vide letter dated 20.10.2023 as tenure of the appellant stood completed at the college of her posting.
- 12. Needs no comments.

Reply on Grounds: -

- a) Incorrect. That the appellant is not aggrieved.
- b) Incorrect. That the fundamental rights of the appellant have not been violated.
- c) Incorrect. As already explained in paras on facts.
- d) Incorrect. That no discrimination was meted out to the appellant.
- e) As already explained in preceding paras.
- f) Incorrect. That the appellant has been treated accordance with the law.
- g) Incorrect. As already explained in preceding paras.
- h) Incorrect. As already explained in preceding paras.
- i) Incorrect. As already explained in preceding paras.
- j) Incorrect. As already explained in preceding paras.
- k) Incorrect. As already explained in preceding paras.
- l) That the respondents may be allowed to raise additional grounds at the time of arguments too.

Prayer:-

It is, therefore, humbly prayed that the instant Service Appeal is based on misconception/misstatements hence may graciously be dismissed.

Mr. Nadeem Aslam Chaudhry
Chief Secretary,
Govt: of Khyber Pakhtunkhwa
Respondent No. 01

Mr. Arshad Khan
Secretary,
Higher Education, Archives
& Library Department
Respondent No. 02

Faeed Ullah Shah
Director,
Higher Education Department,
Respondent No. 03



**DIRECTORATE OF HIGHER EDUCATION
KHYBER PAKHTUNKHWA
RANO GHARI, CHAMKANI STOP, PESHAWAR**

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AUTHORITY LETTER

Mr. Ihtesham-Ul-Haq, Superintendent (BPS-17), Directorate of Higher Education, Khyber Pakhtunkhwa, Peshawar is hereby authorised to submit Parawise Comments in Service Tribunal, Peshawar in case S.A # 2211/2023 titled Shahida Parveen versus Govt: of Khyber Pakhtunkhwa on behalf of respondents.

(Fareedullah Shah)

Director,

Directorate of Higher Education,
Khyber Pakhtunkhwa
Peshawar

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR.**

S.A # 2211/2023

Shahida Parveen..... Appellant

Versus

Govt of Khyber Pakhtunkhwa,
Through Secretary, Higher Education,
Khyber Pakhtunkhwa, Peshawar
& others..... Respondents

AFFIDAVIT

I, Fareedullah Shah, Director, Higher Education, Khyber Pakhtunkhwa, do hereby declare and affirm on oath that the contents of Para wise comments are correct to the best of my knowledge and belief and that nothing has been concealed from this Honourable Court. It is further stated on oath that in this appeal the answering respondents have neither been placed ex-parte nor their defense has been struck off.

Identified by:

[Handwritten Signature]
Deponent
CNIC # 11101-0456092-7
Mobile No. 0333-9151399

ATTESTED

[Circular Notary Seal]
Azmat Ali Advocates
Notary Public
Judicial Complex Peshawar
02-01-2024

S.No = 73

Ana - (A)

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GOVERNMENT OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES &
LIBRARIES DEPARTMENT
CIVIL SECRETARIAT

Dated Peshawar the 11/06/2021

NOTIFICATION

NO.SO(C-1)/HE/1-5/2021/Female Posting-Transfer. The competent authority is pleased to order posting / transfer of the following teaching staff of College Cadre in Higher Education Department with immediate effect in the best public interest:-

S#	Name / Designation / BPS	From	To	Remarks
1	Ms. Naila Rehman, Associate Professor (BS-19) of Mathematics / Principal	GGDC, Balakot (Mansehra)	As Associate Professor (BS-19) of Mathematics at GGDC, Malikpura (Abbottabad)	AVP
2	Ms. Ambreen Gul, Associate Professor (BS-19) of Zoology	GGDC No.1, Mansehra	As Associate Professor (BS-19) of Zoology at GGDC, Balakot (Mansehra)	Vice S#1
3	Ms. Nasreen Bibi, Associate Professor (BS-19) of Statistics / Principal	Under transfer from GGDC, Sarai Naurang (Lakki Marwat) to GGDC Wana (South Waziristan)	Retained as Principal (BS-19) at GGDC, Sarai Naurang (Lakki Marwat)	Vice S#4
4	Ms. Raijeela Tabassum, Associate Professor (BS-19) of Economics / Principal	Under transfer from GGPGC Bannu to GGDC Sarai Naurang (Lakki Marwat)	As Associate Professor (BS-19) of Economics at GGDC, Mandan (Bannu)	AVP
5	Ms. Naghma Saboohi, Associate Professor (BS-19) of Urdu	GGPGC, Haripur	As Associate Professor (BS-19) of Urdu at GGDC, Kulachi, D.I Khan	AVP
6	Ms. Zohra Aslam, Associate Professor (BS-19) of Political Science	GGDC, Khwaza Khela (Swat)	As Associate Professor (BS-19) of Political Science at GFC-W, Peshawar	Vice S#7
7	Ms. Shahana Samin, Associate Professor (BS-19) of Political Science	GFC (W), Peshawar	As Associate Professor (BS-19) of Political Science at GGDC, Tajo Bibi (Charsadda)	AVP
8	Ms. Sadia Mahjabeen, Associate Professor (BS-19) of Botany	GGDC, Havelian (Abbottabad)	As Associate Professor (BS-19) of Botany at GGDC, Nawanshehr (Abbottabad)	AVP
9	Ms. Shehla Bano, Associate Professor (BS-19) of Botany	GGDC, Thall Hangu	As Associate Professor (BS-19) of Botany at GGDC KTS (Haripur)	Vice S#10
10	Ms. Saima Jabeen, Associate Professor (BS-19) of Home Economics	GGDC KTS (Haripur)	As Associate Professor (BS-19) of Home Economics at GGDC No.01, Mansehra	Vice S#2
11	Ms. Tehmina Gul, Associate Professor (BS-19) of Chemistry	GIIEC, Abbottabad 1/8	As Associate Professor (BS-19) of Chemistry at GGDC, Qalandarabad (Abbottabad)	AVP

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	Associate Professor (BS-19) of Computer Science	GGDC Maneri (Swabi)	As Associate Professor (BS-19) of Computer Science at GGDC, Havelian (Abbottabad)	AVP
13	Ms. Ghazala Muhsan, Associate Professor (BS-19) of Computer Science	GGDC Marghuz (Swabi)	As Associate Professor (BS-19) of Computer Science at GGDC, Yar Hussain (Swabi)	AVP
14	Ms. Huma Ibrat, Associate Professor (BS-19) of Computer Science	GGDC Tajn Bihri (Charsadha)	As Associate Professor (BS-19) of Computer Science at GGDC, Gulbahar Peshawar	Vice S#15
15	Ms. Shehla Javed Assistant Professor (BS-18) of Pak Study (working against the upgraded post as result of 5 Tier)	GGDC Peshawar	As Assistant Professor (BS-18) of Pak Study at GGDC, Yar Hussain, Swabi	AVP
16	Ms. Shumaila Nawaz, Associate Professor (BS-19) of English	GIIEC Abbottabad	As Associate Professor (BS-19) of English at GGDC, Parhina (Manshura)	AVP
17	Ms. Shazia Nawab, Associate Professor (BS-19) of English / Principal	GGDC, Tank	As Associate Professor (BS-19) of English at GGDC No.1, D.I Khan	AVP
18	Ms. Shagufta Amir, Associate Professor (BS-19) of English	GGDC Kotlang (Mardan)	As Associate Professor (BS-19) of English at GGDC, Mandian (Abbottabad)	AVP
19	Ms. Sarwat Wadood, Associate Professor (BS-19) of Home Economics	GGDC Karak	As Associate Professor (BS-19) of Home Economics at GGDC No.2 Hayatabad, Peshawar	Vice S#20
20	Ms. Nazish Murad, Lecturer (BS-17) in English (working against the upgraded post as result of 5 Tier)	GGDC No.2 Hayatabad	As Lecturer (BS-17) of English at GGDC, Maneri (Swabi)	AVP
21	Ms. Gul-e-Rana, Associate Professor (BS-19) of Geography	GGDC Kulachi (D.I.Khan)	As Associate Professor (BS-19) of Geography at GGPGC, Haripur	AVP
22	Ms. Safia Nageen, Associate Professor (BS-19) of Islamiyat	GGDC Pabbi (Nowshera)	As Associate Professor (BS-19) of Islamiyat at GGDC No.1, Hayatabad (Peshawar)	AVP of BS-20 in OPS
23	Ms. Najma Sarwat, Associate Professor (BS-19) of Law	GGDC Kulachi (D.I.Khan)	As Associate Professor (BS-19) of Law at GGPGC, Haripur	AVP
24	Ms. Fouzia Naheed, Associate Professor (BS-19) of Mathematics	GGDC Hangu	As Associate Professor (BS-19) of Mathematics at GGDC No.2, Hayatabad, Peshawar	AVP
25	Ms. Abida Azeem Afridi, Associate Professor (BS-19) of Pak Study	GGDC Janrud (Khyber)	As Associate Professor (BS-19) of Pak Study at GGDC, Dara Adam Khel (FR Kohat)	AVP
26	Ms. Nasim Mumtaz, Associate Professor (BS-19) of Pak Study	GGDC Lund Khwar (Mardan)	As Associate Professor (BS-19) of Pak Study at GGPGC, Mardan	AVP

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27	Dr. Raheema Maroof, Associate Professor (BS-19) of Physics	GGDC Sudda (Kurrum)	As Associate Professor (BS-19) of Physics at GGDC, Tajo Bili Charsadda	Vice S#14
28	Ms. Ruzia, Associate Professor (BS-19) of Physics	GGDC Manki (Swabi)	As Associate Professor (BS-19) of Physics at GGDC, Nahaqi (Peshawar)	Vice S#29
29	Ms. Asiya Aslam, Lecturer (BS-17) of Physics (working against the upgraded post as result of 5 Tier)	GGDC Nahaqi (Peshawar)	As Lecturer (BS-17) of Physics at GGDC Manki (Swabi)	AVP of BS-19 in O/S Vice S#28
30	Ms. Shalita Islam, Associate Professor (BS-19) of Physics / Principal	GGDC Shabqaddar (Charsadda)	As Associate Professor (BS-19) of Physics at GGDC, Elka Glund (Mohmad)	AVP
31	Ms. Nazia Begum, Associate Professor (BS-19) of Physics	GGDC Rustam (Mardan)	As Associate Professor (BS-19) of Physics at GGDC Mathra, Peshawar	Vice S#32
32	Ms. Laila Noor, Associate Professor (BS-19) of Physics	GGDC Mathra, Peshawar	As Principal (BS-19) at GGDC, Shabqaddar Charsadda	Vice S#30
33	Ms. Zubaida Tahir, Associate Professor (BS-19) of Physics	GGDC Lund Khwar (Mardan)	As Associate Professor (BS-19) of Physics at GGDC, Nowshera	AVP
34	Ms. Zahida Khatoon, Associate Professor (BS-19) of Political Science	GGDC Khar (Bajaur)	As Associate Professor (BS-19) of Political Science at GGDC, WANA (South Waziristan)	AVP
35	Ms. Taskeen Kausar, Associate Professor (BS-19) of Urdu	GGDC Khwaza Khela (Swat)	As Associate Professor (BS-19) of Urdu at GGDC, Nawan Shehr, Abbottabad	AVP
36	Ms. Rozeena Iqbal, Associate Professor (BS-19) of Urdu	GGDC Bathkela (Malakand)	As Associate Professor (BS-19) of Urdu at GGDC No.1, Charsadda	AVP
37	Ms. Sobia Turmzi, Associate Professor (BS-19) of Urdu	GGDC Thali (Hangu)	As Associate Professor (BS-19) of Urdu at GGDC, Nawan Shehr (Abbottabad)	AVP
38	Ms. Gul-e-Sumbal, Associate Professor (BS-19) of Chemistry	GGDC Daggar (Buner)	As Associate Professor (BS-19) of Chemistry at GGPGC, Mardan	Vice S#39
39	Ms. Secma Gul, Associate Professor (BS-19) of Political Science	GGPGC Mardan	As Associate Professor (BS-19) of Economics at GGDC, Daggar (Buner)	Vice S#38
40	Ms. Beena Afsheen, Associate Professor (BS-19) of Statistics	GGDC Takhu Bhai (Mardan)	As Associate Professor (BS-19) of Statistics at GGDC, Chagharmatti (Peshawar)	Vice S#41
41	Ms. Ishrat Jabeen, Associate Professor (BS-19) of Economics	GGDC Chagharmatti (Peshawar)	As Associate Professor (BS-19) of Economics at GGDC, TakhtDhui (Mardan)	Vice S#40
42	Ms. Saima Abdullah, Associate Professor (BS-19) of Economics	GGDC KTS (Haripur)	As Associate Professor (BS-19) of Economics at GGDC, No.1 (Abbottabad)	Vice S#43

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43	Ms. Yasmeen Begum, Associate Professor (BS-19) of Islamiat	GGDC No.1 Abbottabad	As Associate Professor (BS-19) of Islamiat at GGDC, KTS (Haripur)	Vice S#42
44	Ms. Noreen Naz, Associate Professor (BS-19) of Computer Science	GGPGC, Ilanru	As Associate Professor (BS-19) of Computer Science at GGDC, Khanpur, Haripur	Vice S#45
45	Ms. Kanwal Rashid, Lecturer (BS-17) of Computer Science (working against the upgraded post as result of 3 Tier)	GGDC Khanpur, Haripur	As Lecturer (BS-17) of Computer Science at GGDC, KTS, Haripur	Vice S#46
46	Ms. Alla Bibi, Lecturer (BS-17) of Urdu	GGDC, KTS, Haripur	As Lecturer (BS-17) of Urdu at GGDC, Ghazi, Haripur	AVP of BS-18 in OPS
47	Ms. Lubna Rehman, Associate Professor (BS-19) of Economics	GGDC Panjpir (Swabi)	As Principal (BS-19) at GGDC, Yar Hussain (Swabi)	Vice S#48
48	Ms. Saqiba Bibi, Associate Professor (BS-19) of Zoology / Principal	GGDC Yar Hussain (Swabi)	As Associate Professor (BS-19) of Zoology at GGDC, Koha (Swabi)	AVP
49	Ms. Naveela Khanum, Associate Professor (BS-19) of Urdu	GGDC No.2, Haripur	As Associate Professor (BS-19) of Urdu at GGDC, Haripur	Vice S#5
50	Ms. Nasira Anwar, Associate Professor (BS-19) of Zoology	GGDC Rustam (Mardan)	As Associate Professor (BS-19) of Zoology at GGDC No.1, Hayatabad, Peshawar	Vice S#51
51	Ms. Shakeela Nadir Associate Professor (BS-19) of Zoology	GGDC No.1 Hayatabad, Peshawar	As Associate Professor (BS-19) of Zoology at GGDC, Rustam (Mardan)	Vice S#50
52	Ms. Effat Amjid, Associate professor (BS-19) of Islamiat	GGDC Nowshera	As Associate professor (BS-19) of Islamiat at GFC (W), Peshawar	Vice S#53
53	Ms. Rabia Hina, Associate Professor (BS-19) of Islamiat	GFC (W) Peshawar	As Associate Professor (BS-19) of Islamiat at GGDC, Nowshera	Vice S#52
54	Ms. Ansa Anjum, Associate Professor (BS-19) of Physics	GGDC Panjpir (Swabi)	As Associate Professor (BS-19) of Physics at GGDC, Chagharmatti Peshawar	Vice S#55
55	Ms. Wahida Khan, Associate Professor (BS-19) of English	GGDC Chagharmatti Peshawar	As Associate Professor (BS-19) of Physics at GGDC, Panjpir (Swabi)	Vice S#54
56	Ms. Robina Akhtar, Associate Professor (BS-19) of Physics	GGDC Dara Adam Khel (Kohat)	As Associate Professor (BS-19) of Physics at GGPGC, Kohat	Vice S#57
57	Ms. Rehana Parveen, Associate Professor (BS-19) of Physics	GGPGC Kohat	As Associate Professor (BS-19) of Physics at GGDC, Nahaqi Peshawar	Vice S#58
58	Ms. Asia Aslam, Lecturer (BS-17) of Physics (working against the upgraded post as result of 3 Tier)	GGDC Nahaqi Peshawar	As Lecturer (BS-17) of Physics at GGDC, Sabirabad Karak	AVP BS-18 in OPS
59	Ms. Nowshad Bibi, Associate Professor (BS-19) of Zoology	GGDC Daggur (Buner)	As Associate Professor (BS-19) of Zoology at GGDC, Bacha Khan (Peshawar)	Vice S#60

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60	Ms. Itrat Saheen, Lecturer (BS-17) of Zoology <i>(working against the upgraded post as result of 5 Tier)</i>	GGDC Bacha Khan (Peshawar)	As Lecturer (BS-17) of Zoology at GGDC, Dargai (Charsadda)	AVP
61	Ms. Uzma Nasim, Associate Professor (BS-19) of Chemistry	GGDC Hangu	As Associate Professor (BS-19) of Chemistry at GGDC No.1, Kohat	Vice S#62
62	Ms. Shumaila Bukhari, Lecturer (BS-17) of Chemistry <i>(working against the upgraded post as result of 5 Tier)</i>	GGDC No. 3 Kohat	As Lecturer (BS-17) of Chemistry at GGDC, Hangu	AVP of BS-19 in OPS Vice S#61
63	Ms. Shanyla Darlas, Associate Professor (BS-19) of Urdu	GGDC Tank	As Associate Professor (BS-19) of Urdu at GGDC No.2, Haripur	Vice S#49
64	Ms. Shumaila Firdos, Associate Professor (BS-19) of Botany	GGDC Battagram	As Associate Professor (BS-19) of Botany at GGDC No.1, Abbottabad	Vice S#65
65	Ms. Sadia Afzal, Associate Professor (BS-19) of Botany	GGDC No.1 Abbottabad	As Associate Professor (BS-19) of Botany at GGDC, Battagram	Vice S#64
66	Ms. Shazia Norcen, Associate Professor (BS-19) of Zoology	GGDC Marghuz (Swabi)	As Associate Professor (BS-19) of Zoology at GFC-W, Peshawar	Vice S#67
67	Ms. Haizal Begum, Associate Professor (BS-19) of Pak-Studies	GFC-W, Peshawar	As Associate Professor (BS-19) of Pak-Studies at GGDC, Bacha Khan (Peshawar)	Vice S#68
68	Ms. Seema Alam, Lecturer (BS-17) of Pak-Studies <i>(working against the upgraded post as result of 5 Tier)</i>	GGDC Bacha Khan (Peshawar)	As Lecturer (BS-17) of Pak-Studies at GGDC, Dargai, Charsadda	AVP
69	Ms. Shabnaz Fazal, Associate Professor (BS-19) of Zoology	GGDC, Barikot, Swat	As Associate Professor (BS-19) of Zoology at GGDC, Nahaqi (Peshawar)	Vice S#70
70	Ms. Humaira Mursaleen, Lecturer (BS-17) of Zoology <i>(working against the upgraded post as result of 5 Tier)</i>	GGDC Nahaqi (Peshawar)	As Lecturer (BS-17) of Zoology at GGDC, Kotha (Swabi)	AVP
71	Ms. Faiqa Bibi, Associate Professor (BS-19) of Chemistry	GGDC, Thara, Malakand	As Associate Professor (BS-19) of Chemistry at GGDC, Tarkha, Nowshera	Vice S#72
72	Ms. Afsheen, Lecturer (BS-17) of Chemistry <i>(working against the upgraded post as result of 5 Tier)</i>	GGDC, Tarkha, Nowshera	As Lecturer (BS-17) of Chemistry at GGDC, Panjpir, Swabi	AVP
73	Ms. Shahida Parveen, Associate Professor (BS-19) of Pashto	GGDC No.1, Charsadda	As Associate Professor (BS-19) of Pashto at GGDC, Gulshan Rehman, Peshawar	Vice S#74
74	Ms. Somia Naz, Associate Professor (BS-19) of Zoology	GGDC, Gulshan Rehman Colony, Peshawar	As Associate Professor (BS-19) of Zoology at GGDC No.1, Charsadda	Vice S#73
75	Ms. Nazish Qazi, Associate Professor (BS-19) of Islamiyat	GGDC, Kallang, Mardan	As Associate Professor (BS-19) of Islamiyat at GGDC Pabbi (Nowshera)	Vice S#22

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77	Dr. Nagina Bibi, Associate Professor (BS-19) of Maths	GGDC No.1, Abdullahabad	As Associate Professor (BS-19) of Maths at GGDC, Khanpur, Haripur	Vice S#77
78	Ms. Inam Iqbal, Lecturer (BS-17) of Maths (working against the upgraded post as result of 5 Tier)	GGDC, Khanpur, Haripur	As Lecturer (BS-17) of Maths at GGDC, Kotla Swabi.	AVP
79	Ms. Azra, Associate Professor (BS-19) of Economics	GGDC, Land Khwar, Mardan	As Associate Professor (BS-19) of Economics at GGDC, Dargal, Malakand	Vice S#79
80	Ms. Shabila Begum, Principal (BS-19)	GGDC, Dargal, Malakand	As Lecturer (BS-17) of Maths at GGDC, Dir Upper.	AVP
81	Ms. Zuhra Idrees, Associate Professor (BS-19) of Computer Science	GGDC No.3, Kohat	As Associate Professor (BS-19) of Islamiyat at GGDC No.3, Kohat.	Against the already occupied post
82	Ms. Nadia Nisar, Associate Professor (BS-19) of Zoology	GGDC, Madyan, Swat	As Associate Professor (BS-19) of at GGDC, Saldu Sharif, Swat	AVP
83	Ms. Rukhsana Naz, Associate Professor (BS-19) of Biology	GGPGC, Bannu	As Associate Professor (BS-19) of Zoology at GGDC, Tajo Bibi, Charsadda	AVP of BS-20 in OPS
84	Ms. Faiza, Associate Professor (BS-19) of Pak Studies	GGDC, TahhBhai, Mardan	As Associate Professor (BS-19) of Biology at GGDC, Pirnai, Nowshera	AVP
85	Ms. Shehla, Lecturer (BS-17) of Statistics (working against the upgraded post as result of 5 Tier)	GGDC, KTS, Haripur	As Associate Professor (BS-19) of Pak Studies at GGDC, Khanpur, Haripur	Vice S#85
86	Ms. Salma Habib, Associate Professor (BS-19) of Islamiyat	GGDC, Khanpur, Haripur	As Lecturer (BS-17) of Statistics at GGDC, KTS, Haripur	AVP of BS-19 in OPS Vice S#84
87	Ms. Fouqia Tabassum, Lecturer (BS-17) of Islamiyat (working against the upgraded post as result of 5 Tier)	GGDC, Rustam, Mardan	As Associate Professor (BS-19) of Islamiyat at GGDC, Dabgari, Peshawar	Vice S#87
88	Ms. Najmul Ambarcen Associate Professor (BS-19) of English	GGDC, Dabgari, Peshawar	As Lecturer (BS-17) of Islamiyat at GGDC, Rustam, Mardan	AVP
89	Ms. Tasneem Bano Associate Professor (BS-19) of Islamiyat	GGDC Daggar, Duner	As Associate Professor (BS-19) of English at GGDC, Garhi Kapoora, Mardan	AVP
90	Ms. Tasneem Bano Associate Professor (BS-19) of Islamiyat	GGDC Dargal Malakand	As Associate Professor (BS-19) of Islamiyat at GGDC, Gulshan Rehman, Peshawar	Vice S#90
90	Ms. Huma Tariq Assistant Professor (BS-18) of IPE (working against the upgraded post as result of 5 Tier)	GGDC Gulshan Rehman Peshawar	As Assistant Professor (BS-18) of HPE at GGDC, Dargai, Malakand	AVP of BS-19 in OPS Vice S#89

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91	Ms. Salma Rehman Associate Professor (BS-19) of Home Economics	GGDC No.1 Charsadda	As Associate Professor (BS-19) of Home Economics at GGDC, Mathra, Peshawar	Vice S#92
92	Ms. Farhat Yasmeen Associate Professor (BS-19) of Statistics	GGDC Mathra, Peshawar	As Associate Professor (BS-19) of Statistics at GGDC No.1, Charsadda	Vice S#91
93	Ms. Shahnaz Musarat Associate Professor (BS-19) of Maths	GGDC Karak	As Associate Professor (BS-19) of Maths at GGDC, Zaryab Colony Peshawar	Vice S#94
94	Ms. Sumera Anjum Assistant Professor (BS-18) of Maths (working against the upgraded post as result of 5 Tier)	GGDC Zaryab Colony Peshawar	As Assistant Professor (BS-18) of Maths at GGDC, Karak	AVP of BS-19 in OPS Vice S#93
95	Ms. Alia Aslam, Associate Professor (BS-19) of Chemistry	GGDC Pir Pal, Nowshera	As Associate Professor (BS-19) of Chemistry at GGDC, Mathra, Peshawar	Vice S#96
96	Ms. Nida Bukhari, Associate Professor (BS-19) of Chemistry	GGDC Mathra	As Associate Professor (BS-19) of Chemistry at GGDC, Pir Pal, Nowshera	Vice S#95
97	Ms. Saima Almas, Associate Professor (BS-19) of Mathematics	GHEC Nowshera	As Associate Professor (BS-19) of Mathematics at GGDC, Hangu	Vice S#98
98	Ms. Fatima Bibi, Associate Professor (BS-19) of Pak Study	GGDC Rustam Mardan	As Associate Professor (BS-19) of Pak Study at GGDC, Pabbi Nowshera	Vice S#99
99	Ms. Zakia Minhas, Associate Professor (BS-19) of Pak Studies	GGDC Pabbi Nowshera	As Associate Professor (BS-19) of Pak Studies at GGDC, Rustam Mardan	Vice S#100
100	Ms. Naheed Begum, Associate Professor (BS-19) of Islamiyat	GGDC Kalaya Orakzai	As Associate Professor (BS-19) of Islamiyat at GGDC, Garhi Kapoora, Marda	AVP
101	Ms. Ruqia Bibi, Associate Professor (BS-19) of Zoology	GGDC No.2 D.I Khan	As Associate Professor (BS-19) of Zoology at GGDC No.1, D.I Khan	AVP
102	Ms. Fazeelat Zuhra, Lecturer (BS-17) of Chemistry (working against the upgraded post as result of 5 Tier)	GGDC Zaryab Colony, Peshawar	As Lecturer (BS-17) of Chemistry at GGDC, Dara Adam Khel, Kohat	AVP BS-18 in OPS
103	Ms. Noreen, Associate Professor (BS-19) of Mathematics	GGDC Daggar Buner	As Associate Professor (BS-19) of Mathematics at GGDC, Nowshera	Vice S#104
104	Ms. Rubina Akhtar, Lecturer (BS-17) of Islamiyat, (working against the upgraded post as result of 5 Tier)	GGDC Nowshera	As Lecturer (BS-17) of Islamiyat at GGDC, Daggar, Buner	AVP
105	Ms. Shakila Naisra, Associate Professor (BS-19) of Chemistry	GCGC Peshawar	As Associate Professor (BS-19) of Chemistry at GGDC No.1, Hayatabad, Peshawar	Vice S#106
106	Ms. Neelam Gul, Associate Professor (BS-19) of Political Science	GGDC No.1 Hayatabad, Peshawar	As Associate Professor (BS-19) of Political Science at GCGC, Gulbahar, Peshawar	Vice S#105

Signature 7/8

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3. No TA / DA is allowed.

SECRETARY
HIGHER EDUCATION DEPARTMENT

ENDST: NO. & DATE EVEN.

Copy forwarded to the:

1. Accountant General Khyber Pakhtunkhwa, Peshawar.
2. Director, Higher Education Khyber Pakhtunkhwa, Peshawar.
3. Principal(s) concerned.
4. District Accounts Officer(s) concerned.
5. Officers concerned.
6. Master File.


SECTION OFFICER (COLLEGES-I)

attested
PMT

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Annex (B)

(12)



**GOVT. OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES &
LIBRARIES DEPARTMENT**

Dated Peshawar the 12th October, 2023

NOTIFICATION

NO.SO(C-III)/HED/1-6/PSD/2022: Consequent upon approval/NOC of Election Commission of Pakistan vide letter No.F.3(1)/2023-El& (PEC) dated 12.02.2023, and in partial modification of this department's notification of even No. dated 29.05.2023, postings/transfers/adjustments of the following female teaching staff of college cadre in Higher Education Department are hereby ordered, with immediate effect, in the best public interest:-

S #	Name/Designation/BPS	From	To	Remarks
1.	Lala Rukh, Associate Professor of Urdu (BS-19)	Under transfer to GGDC No.1 Hayatabad, Peshawar	GGDC No.2 Hayatabad, Peshawar	Vice Sr. No.2
2.	Fouzia Naheed, Associate Professor of Mathematics (BS-19)	GGDC No.2 Hayatabad, Peshawar	GGDC Hangu	AVP
3.	Nadia Jamshed, Associate Professor of Computer Science (BS-19)	Under transfer to GGDC No.1 Hayatabad, Peshawar	GGDC Garhi Kapoora, Mardan	AVP
4.	Robina Mashal, Associate Professor of Urdu (BS-19)	Under transfer to GGDC No.1 Hayatabad, Peshawar	GGDC Katlang, Mardan	AVP
5.	Fozia Memon Khattak, Associate Professor of Urdu (BS-19)	GCGC Peshawar	GGDC Karak	AVP
6.	Naheed Hussain, Associate Professor of Pak Study (BS-19)	Under transfer to GGDC No.1 Hayatabad, Peshawar	Retained at GFC (W), Peshawar	Against the already occupied post
7.	Sadaf Bashir, Associate Professor of Physics (BS-19)	Under transfer to GFC (W), Peshawar	GGDC Tarkha, Nowshera	Vice Sr. No.08
8.	Rani Burki, Associate Professor of English (BS-19)	Under transfer to GGDC Tarkha, Nowshera	GGDC Tank	AVP
9.	Rabia Khan, Associate Professor of Mathematics (BS-19)	Under transfer to GGDC Khanpur, Haripur	GGDC Mankaral, Haripur	AVP
10.	Humaira Nousheen, Associate Professor of Pak Study (BS-19)	Under transfer to GCGC Peshawar	GFC (W), Peshawar	Vice Sr. No.11
11.	Tahira Gul, Associate Prof. of History (BS-19)	GFC (W) Peshawar	GGDC Rustam, Mardan	AVP
12.	Sadaf Syed, Associate Professor of Philosophy (BS-19)	Under transfer to GCGC Peshawar	GGDC Gulshan Rehman Colony, Peshawar	Vice Sr. No.13

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12/10/23

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13.	Shahida Parveen, Associate Professor of Pashto (BS-19)	GGDC Gulshan Rehman Colony, Peshawar	GGDC Lund Khwar, Mardan	AVP
14.	Shabnam Nawaz, Associate Professor of Urdu (BS-19)	Under transfer to GGDC Bacha Khan, Peshawar	GCGC Peshawar	Vice Sr. No.15
15.	Hadia Sald, Associate Professor of Urdu (BS-19)	GCGC Peshawar	GGDC Sawal Dher, Mardan	AVP
16.	Salma Rehman, Associate Professor of Home Economics (B-19)	GGDC Mathra, Peshawar	GGDC Sawal Dher, Mardan	AVP
17.	Razia Bibi, Associate Professor of Urdu (BS-19)	Under transfer to GGDC Lakki Marwat	GGDC Sarai Naurang, Lakki Marwat	AVP
18.	Uzma Noreen, Associate Professor of Botany (BS-19)	Under transfer to GGDC No.3, Kohat	GGDC Dara Adam Khel, Kohat	AVP
19.	Shagufta Begum, Associate Professor of Pashto (BS-19)	Under transfer to GGDC Nahaql, Peshawar	GGDC Nowshera	AVP
20.	Faria Khan, Associate Professor of Psychology (BS-19)	Under transfer to GGPGC No.1, Abbottabad	GGDC Seral Saleh, Haripur	AVP
21.	Humaira Afridi, Associate Professor of Zoology (BS-19)	Under transfer to GGDC Zaryab Colony, Peshawar	GGDC Dabgari, Peshawar	AVP
22.	Saltanat Jehan, Associate Professor of Physics (BS-19)	Under transfer to GGDC Zaryab Colony, Peshawar	GGDC Nowshera	AVP
23.	Saba Rani, Associate Professor of Economics (BS-19)	Under transfer to GHEC Abbottabad	GGDC Havellan, Abbottabad	AVP
24.	Saltanat Begum, Associate Professor of Islamiyat (BS-19)	Under transfer to GGDC Tajo Bibi, Charsadda	Retained at GGDC Pirpai, Nowshera	AVP
25.	Sumera Anjum, Associate Professor of Mathematics (BS-19)	Under transfer to GGDC Thal, Hangu	GGDC Paharpur, D.I.Khan	AVP
26.	Nadia, Associate Professor of Botany (BS-19)	Under transfer to GGDC Dargal, Malakand	GGDC Barikot, Swat	AVP
27.	Uzma, Associate Professor of Botany (BS-19)	Under transfer to GGDC No.1, Charsadda	GGDC Zaida, Swabi	AVP
28.	Nabeela Younas, Associate Professor of Botany (BS-19)	GGDC Zaryab Colony, Peshawar	GFC (W), Peshawar	Vice Sr. No.29
29.	Benazir Begum, Associate Professor of Physics (BS-19)	GFC (W), Peshawar	GGDC Zaryab Colony, Peshawar	Vice Sr. No.28
30.	Ayesha Bibi, Associate Prof. of English (BS-19)	GGDC Chitral	As Principal GGDC Drosh, Chitral	AVP
31.	Faiza Rasheed, Associate Professor of Maths (BS-19)	Under transfer to GGDC Rustam, Mardan	GCGC Peshawar	Vice Sr. No.05
32.	Faiza Ejaz, Associate Prof. of Economics (BS-19)	GGDC Rustam, Mardan	GGDC Pir Pai, Nowshera	Vice Sr. No.33
33.	Rukhsana Naz, Associate Prof. of Zoology (BS-19)	GGDC Pir Pai, Nowshera	GGDC Rustam, Mardan	Vice Sr. No.32

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34.	Sabeen Kamal, Associate Professor of Zoology (BS-19)	GGDC Yar Hussain, Swabi	GGDC Dara Adam Khel, Kohat	Vice Sr. No.35
35.	Kaisoom Saeed, Associate Professor of Mathematics (BS-19)	GGDC Dara Adam Khel, Kohat	GGDC Yar Hussain, Swabi	Vice Sr. No.34
36.	Sabahat Khan, Associate Professor of Mathematics (BS-19)	GGDC Garhi Kapoora, Mardan	GGDC Chagarmati, Peshawar	Vice Sr. No.37
37.	Beena Afsheen, Associate Professor of Statistics (BS-19)	GGDC Chagarmati, Peshawar	GGDC Garhi Kapoora, Mardan	Vice Sr. No.36
38.	Ms. Mehar Un Nisa, Associate Professor of Home Economics (BS-19)	Under Transfer to GGDC Mathra, Peshawar	GGDC Mathra, Peshawar	Vice Sr. No.16
39.	Ms. Somia Naz, Associate Professor of Zoology (BS-19)	GGDC No.1, Charsadda	GGDC Balambat, Dir	AVP
40.	Ms. Saima Zubair, Associate Professor of Pak Study (BS-19)	GGDC Katlang, Mardan	GGDC No.1, Charsadda	Vice Sr. No.39

-Sd-
SECRETARY
 HIGHER EDUCATION DEPARTMENT

ENDST: NO. & DATE EVEN:

Copy of the above is forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director Higher Education, Khyber Pakhtunkhwa, Peshawar.
3. Directors, Regional Directorates of Higher Education.
4. Director-IT, HEMIS Cell, Higher Education Department.
5. Principal, Govt. Colleges concerned.
6. District Accounts Officers, concerned.
7. PS to Secretary Higher Education Department.
8. Officers concerned.
9. Master File.

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12/10/23
(SAMIA JABEEN)
 Section Officer (Colleges-III)

[Handwritten Signature]



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**GOVERNMENT OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES &
LIBRARIES DEPARTMENT**

No.SO(C-III)/HED/1-6/PSB/2022
Dated Peshawar the October 20, 2023

To

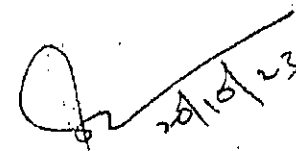
The Director,
Higher Education, Khyber Pakhtunkhwa
Peshawar.

Subject:

APPEAL FOR TRANSFER CANCELLATION.

I am directed to refer to the subject noted above and to state that the Competent Authority has regretted the request regarding cancellation of transfer order in respect of Ms. Shahida Parveen, Associate Professor of Pashto (BPS-19), Govt. Girls Degree College Gulshan Rehman, Peshawar as the Associate Professor concerned has completed her tenure in the said college.

2. In view of the above, the lady concerned may be informed accordingly.


(SAMIA JABEEN)

Section Officer (Colleges-III)

Endst No. & dated even.

Copy forwarded to:

1. Principal, Govt. Girls Degree College Gulshan Rehman, Peshawar.
2. Ms. Shahida Parveen, Associate Professor of Pashto (BPS-19), Govt. Girls Degree College Gulshan Rehman, Peshawar.
3. PS to Secretary Higher Education Department.


Section Officer (Colleges-III)

attested
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Annex-D

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Subject: APPEAL FOR TRANSFER CANCELLATION

It is stated that I have been transferred vide letter No. F3(1)/2023-El's Dated 12/02/2023 (ANNEX-A) which is against the rules and regulations.

I was previously transferred to Government Girls Degree College Gulshan Rehman Colony Peshawar. Vide letter NO. SO(C-1)/HE/1-5/2021/Female posting - Transfer, serial no. 73 (ANNEX-B). I Took charge in this college on 12/06/2021 (ANNEX-C).

I teach Pushto, Urdu & Islamiyat in Intermediate classes. I am also the incharge of college magazine. Hence, this college needs my services.

Moreover, my family is settled in Peshawar. My children are studying in Peshawar University. My husband, Parvez Ahmad Khan is also a principal in Govt. Shaheed Ahmad Elahi Technical Higher Secondary School Gulbahar Peshawar. Therefore I request to retain my posting in the same college on the basis of spouse plicy.

Beside the above reasons. I also have medical issues. My treatment is in progress in Peshawar. This transfer will make my constant medical treatment impossible.

The college is indire needs of my services.

Therefore, it is requested to withdraw my transfer order, please.

Respected sir:

Ms Shahida (Associate professor of pashto) is teaching urdu and Islamiyat apart from her subject due to the deficiency of subject Teachers in the college. There fore to retain her transfer would be better in that great interest of student.

Your Sincerely,
Shahida Parveen
Associate Professor of Pashto
GGDC Gulshan Rehman Peshawar
Dated: ___/10/2023

Copy for information:

1. Principal GGDC Gulshan Rehman Peshawar
2. Director Higher Education Peshawar

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PRINCIPAL
Govt. Degree College
For Women
Kohat Road Peshawar

Shahida Parveen
Associate Professor of Pashto
GGDC Gulshan Rehman Peshawar
Dated: ___/10/2023

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16/X/2023

Annex - E

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**DIRECTORATE OF HIGHER EDUCATION
KHYBER PAKHTUNKHWA
RANO GHARI, NEW CHAMKANI CHOWK, PESHAWAR**

Tel # 091-9214412 / 091-9214416

E-mail: dhokopesh@gmail.com

Facebook.com/dhokopeshawar

No. 5727

/CA-1/Exit: Branch/A-12/Ms. Shahida Parveen/ Pashto

Dated Peshawar the 18/10/2023

To

The Secretary to Govt. of Khyber Pakhtunkhwa,
Higher Education Department, Peshawar.

Subject: CORRIGENDUM.

I am directed to enclose herewith a copy of self-explanatory application in respect of Ms. Shahida Parveen Associate Professor of Pashto (BPS-19) Govt. Girls Degree College, Gulshan Rehman Colony Kohat Road (Peshawar), wherein she stated that she has been transferred to Govt. Girls Degree College, Lund Khwar, Mardan on 02.10.2023 which is against the tenure policy. She added that she has health issues as well as her husband is Govt. Employee at Elementary & Secondary Education, Govt. of Khyber Pakhtunkhwa, Peshawar. She also stated that on transfer, her children will suffer as they are studying at Peshawar.

In view of the above, it is therefore, requested to issue corrigendum order and Ms. Shahida Parveen Associate Professor of Pashto (BPS-19) may be retained at Govt. Girls Degree College, Gulshan Rehman Colony Kohat Road (Peshawar).

With best regards

(Farida Bibi)
DY. DIRECTOR (FEMALE)

attested
FBI

o/c

[Handwritten signature]

Cost of Rs. 7000/- received in Service Appeal No. 2211/2023,
Titled Shahida Parveen vs. Higher Edu.

in the office of Assistant Registrar, Vide Order 05/12/23, Submitted on 02/01/2024

02/01/24
Assistant Registrar
Khyber Pakhtunkhwa
Service Tribunal
Peshawar