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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BEFORE THE HONOURABLE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal # 2211/2023		
Shahida Parveen		Appellant
	Versus	Khyber Pakhtukhwa Strvice Tribunal
Govt. of Khyber Pakhtunkhwa		Diary No. 10190
ThroughChief Secretary		Respondents 2-1- 2024
&others	• • • • • • • • • • • • • • • • • • • •	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.
- c) 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.
- 1) 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

Director,

Higher Education Department, Respondent No. 03



DIRECTORATE OF HIGHER EDUCATION KHYBER PAKHTUNKHWA BANG CHARL CHARKANI STOP PESHAWAR

RANO GHARI, CHAMKANI STOP, PESHAWAR

Tel # 091-2650024 / Fax # 091-2260181

E-mail:- dhekpkpesh@gmail.comFacebook.com/dhekppeshawar Twitter.com/dhekppeshawar1

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.

(Fareeduallah Shah)

Directorate of Higher Education, Khyber Pakhtunkhwa Peshawar



BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

AFFIDAVIT

& others......Respondents

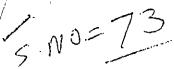
I, Fareedullah Shah, Director, Higher Education, Khyber Pakhtunkhwa, do hereby declare and affirm on oath that the contents of Para wise comments are correct to the best of my knowledge and belief and that nothing has been concealed from this Honourable Court. It is further stated on oath that in this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

Identified by:

CNIC # 11101-0456093-7 Mobile Np.0333-9151399

ATTESTED

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NOTIFICATION







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

Dated Peshawar the 11/06/2021

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	То	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	GODC No.1, Manschra	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 Waziriston)	Retained as Principal (BS-19) at GGDC, Sarai Naurang (Lakki Marwat)	Vice S#4
4	Ms. Raheela Tabassum, Associate Professor (BS-19) of Economics / Principal	Under transfer from GGPGC Bannu to GGDC Sarai Naurung (LakkiMarwat)	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 (Swal)	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		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	GHEC, Abbottabad	As Associate Professor (BS-19) of Chemistry at GGDC, Qalandarabad (Abbottabad)	AVP

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	Assessment Nine		As Associate Professor	r
	Associate Professor (IIS-19) of Computer Science	GGDE Maneri (Swabi)	Land to a Computer	AVP
-			Science at GGDC. Havelian (Ahbottnhad)	
1	1110, 13713231- 54	distribute have been	Tan Associate Molesson	AVP
-	Associate Professor (IIS-19) of Computer Science	(Swahj)	Lanc total Computer	777
1-		Aumani	Science at GODC, You	
Į.	1 174 b. I dittor a de .	<u> </u>	Hussain (Swabi)	
1.	1 / 33 W H (15) 4 Ha 4	GODC Tajn filbi	As Associate Professor	Vice S#15
	of Computer Science	(Charsadda)	(118-17) of Computer Science at	
1			OCOC' Onipapet	
15	-	1	Peshawar	
``	The street of th		As Assistant Professor	
1	Assistant Professor (BS-18) of	GCGC Peshawar	(115-18) of Pak Study at	VAS
l	Pak Study (triviling against	2010 031121141	GODC, Yar Hussain.	
_	the upgraded pass as result of 5 Tier)		Swabi	
16	Ms. Shumaila Nawaz.	<u>L</u>		
i	Associate Desc.	GHEC Abbottabad	As Associate Professor	
	Associate Professor (BS-19) of English		(BS-19) of English at	AVP
	1		GGDC, Parkina	
17	Ms. Shazia Nawab,		(Manschra)	
l	Associate Professor (BS-19) of	GGDC. Tank	As Associate Professor	
	English / Principal		(BS-19) of English at	AVP
18	Ms. Shagusta Amir.		GGDC No.1, D.I Khan	
	Associate Professor (BS-19) of	GGDC Ketlang	As Associate Professor	
	English	(Mardan)	(BS-19) of English at '	AVP
	1		GGDC, Mandian	ì
19	Ms. Sarwal Wadood.	·	(Abbottabad)	
	Associate Professor (BS-10)	GGDC Karak	As Associate Professor	*sr - 6220
	of Home Economics	OCDE KTAK	(BS-19)	Vice S#20
			of Home Economics	
	1	<u>}</u>	at GGDC No.2	
20	Ms. Nazish Murad,	GGDC No.2	Hayatabad, Peshawar	
	Lecturer (BS-17) in English	Hayatabad	As Lecturer (BS-17) of	4377
	(working against the upgraded	110/mixtom	English at GGDC, Maneri (Swabi)	AVP
	post as result of 5 Tier)	1	MINISTER (SAMED)	
2[Mis. Gul-c-Rann	GGDC Kulachi	As Associate Professor	
	Associate Professor (BS-19) of	(D.I.Khan)	(BS-19) of Geography at	AZED
	Geography	(011110111)	GGPGC. Haripur	AVP
2	Ms. Safia Nagren,	GGDC Pabbi	As Associate Professor	4100 400 00
- 1	Associaté Professor (BS-19) of	(Nowshera)	(BS-19) of Islamiyat at	AVP of BS-20
Į	Islamiyat	/ /	GGDC No.1, Hayatabad	in OPS
	• -	,	(Peshawar)	
3	Ms. Najma Sarwat	GGDC Kulachi	As Associate Professor	
_	Associate Professor (BS-19) of	(D.J.Khan)	We to verific Libitation	
ļ	Law	(Notional)	(BS-19) of Law at	AVP
-	Ms. Fouzia Naheed.	GCDCHees	GGPGC, Haripur	
- 1		GGDC Hangu	As Associate Professor	
	Associate Professor (BS-19) of		(BS-19) of Mathematics	AVP
1	Mathematics		at GGDC No.2.) ····
			Hayatabad, Peshawar	1
1	Ms. Abida Azeem Afridi,	GGDC Jamrud	As Associate Professor	
	Associate Professor (BS-19) of	(Khyber).	(BS-19) of Pak Study at	1
	Pak Study	• •	CODO Des Ada es es	AVP
_[GGDC, Dara Adam Khel	
Ā	As. Nasim Mumtaz,	GGDC Lund	(FR Kohat)	<u> </u>
			As Associate Professor	
12	ak Study	Khwar (Mardan)	(BS-19) of Pak Study at GGPGC, Mardan	AVP
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		GGDC Sadda (Kurram)	As Associate Professor (BS-19) of Physics at GDGC, Tajo Hili Chorradda	Vice XIII4
	Associate Professor (BS-19) of Physics	GGDC Manki (Swabi)	As Associate Professor (US-19) of Physics at GGDC, Nahaqi (Peshawar)	Vice S#2"
,	Ms. Asiya Asiam, Lecturer (BS-17) of Physics (working against the upgraded post as result of 5 Tier)	GODC Nahaqi (Peshawar)	As Lecturer (BS-17) of Physics at OGDC Manki (Swabi)	AYP of 113-17 in OPS Vice S#28
0	Ms. Shalsta Islam. Associate Professor (BS-19) of Physics / Principal	GGDC Shabqaddar (Charsadda)	As Associate Penfessor (BS-19) of Physics at GGDC, Ekka Glund (Mohmad)	AVP
	Ms. Nazia Begum, Associate Professor (BS-19) of Physics	GGDC Rustam (Mardan)	As Associate Professor (BS-19) of Physics at GGDC Mathen, Peshawar	Vice \$#32
12	Ms. Laila Noor, Associate Professor (BS-19) of Physics	GGDC Mathra, Peshawar	As Principal (BS-19) at GGDC, Shabqudar Charsadda	Vice S#30
13	Ms. Zubaida Tahlr, 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 Undu	GGDC Khwaza Khela (Swat)	As Associate Professor (BS-19) of Urdu at GGDC, Nawan Shehr, Abbottabad	AVP
36	Ms. Rozeena lqbal, Associate Professor (BS-19) of Urdu		As Associate Professor (BS-19) of Urdu at GGDC No.1. Charsadda	AVP
37	Ms. Sobia Tirimzi, Associate Professor (BS-19) of Urdu		As Associate Professor (BS-19) of Urdu at GGDC, Nawan Shehr (Abbottabad)	AVP
38	Ms. Gul-e-Sumbal, Associate Professor (BS-19) of Chemistry Ms. Seema Gul,	<u></u>	As Associate Professor (BS-19) of Chemistry at GGPGC, Mardan	Vice S#39
,,, (0	Associate Professor (BS-19)'of Political Science Ms. Heena Afsheen.	GCDC T-V- TI	As Associate Professor (BS-19) of Economics of GGDC, Daypar (Bureau)	1 Vice S#38
44	Associate Professor (BS-19) of Statistics Ms. Ishrat Jabeen	(Mardan)	(BS-19) of Statistics at GGDC, Chapharman	Vice SH41
41	Associate Professor (BS-19) of Economics Ms. Saima Abdullah, Associate Professor (BS-19) of	GGDC Chagharmatti (Peshawar)	As Associate Professor (BS-19) of Economics of GGDC, TakhtBhai	Vice S#40
	Economics (US-19) of	(Haripur)	As Associate Professor (BS-19) of Economics : GGDC, No.1 (Abbottabad)	Nice S#43

43	Ms. Yasmeen Begum. Associate Professor (BS-19) o	GGDC No.1	As Associate Professor (BS-19) of Islamiat at	Vice S#42	(
44	Islamiat Ms. Noreen Naz. Associate Professor (BS-19) o Computer Science	GOPGC, Bannu	GGDC, KTS (Haripur) As Associate Professor (HS-19) of Computer Science at GGDC Khanpur, Haripur	Vice S#45	•
45	Lecturer (BS-17) of Compute Science (working against the upgraded past as result of S		As Lecturer (ISS-17) of Computer Science at GODC, KTS, Haripur	Vice S#46	
, 4	Ms. Alia Bibi. Lecturer (BS-17) of Urdu	GGDC, KTS, Haripor	As Lecturer (BS-17) of Urdu at GUDC, Ghazi, Haripour	AVP of BS-18 in OPS	
1	Associate Professor (BS-19)	GGDC Panjplr of (Swabi)	As Principal (BS-19) at GGDC, Yar Hussoin (Swabi)	Vice S#48	
1	Economics 8 Ms Saqiba Bibi. Associate Professor (BS-19) Zoology / Principal	GGDC Yar Hussain of (Swabi)		AVP	
4	9 Ms. Naveela Khanum. Associate Professor (BS-19) Urdu	GGDC No.2, of Haripur	As Associate Professor (BS-19) of Urdu at GGPOC, Haripur	Vice S#5	
5		of (Mardan)	As Associate Professor (BS-19) of Zoology at GGDC No1, Hayatabad, Peshawar	Vice S#51	
\$1	Ms. Shakeela Nadir Associate Professor (BS-19) Znology	GGDC No. I Hayatabad, Peshawar	As Associate Professor (BS-19) of Zoology at GGDC, Rustam (Mardan)	Vice S#50	
52	Associate professor (BS-19)	GGDC Nowshern	As Associate professor (BS-19) of Islamiat at GFC (W), Peshawar	Vice \$#53	
. 53	Ms. Rabia Hina, Associate Ptofessor (BS-19) o Islamiat		As Associate Professor (BS-19) of Islamiat at GGDC, Nowshera	Vice S#52	
-1.1	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	
A	fs. Wahida Khan, ssociate Professor (BS-19) of glish	Peshawar	As Associate Professor (BS-19) of Physics at GGDC, Panjpir (Swabi)	Vice S#54	
As Phy	s. Robina Akhtar, sociate Professor (BS-19) of sics		As Associate Professor (BS-19) of Physics at GGPGC, Kohat	Vice S#57	-
Ass. Phys			As Associate Professor (BS-19) of Physics at GGDC. Nahaqi Peshav	Vice S#S	8
Lecu (work	Asia Aslam, uer (BS-17) of Physics king against the upgraded is result of 3 Tier)	GGDC Nahaqi Peshawar	As Lecturer (BS-17) o Physics at GGDC, Sabirabad Karak		
59 Ms. N	lowshad Bibi, iate Professor (BS-19)	GGDC Daggar (Buner)	As Associate Professo (BS-19) of Zoology at GGDC Bacha Khan (Peshaw	Vice S	#60

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60	Ms. Itmt Sabeen, Lecturer (BS-17) of Zoology (working against the upgraded post as result of 5 Tier)	GGDC Bacila Khan (Peshawar)	As Lecturer (BS-17) of Zoology at OODC, Dargal (Charsadda)	۸۷۱۰
61	Ms. Uznia Nasim, Associate Professor (BS-19) of Chemistry	GGDC Hangu	As Associate Professor (BS-19) of Chemistry at GGDC No.1, Kohul	Vice S#62
62		GGDC No. 3 Kolini	As Lecturer (BS-17) of Chemistry at OGDC, Hungu	AVP of BS-19 in OPS Vice S#61
	post as result of 5 Tier)			A160 21101
63		GGDC Tank	As Associate Professor (BS-19) of Urdu at OODC No.2, Harlpur	Vice S#49
64	Associate Professor (BS-19) of	GGDC Battagram	As Associate Professor (BS-19) of Botany at GODC No.1, Abbottabad	Vice S#65
65	Ms. Sadia Afzal, Associate Professor (BS-19) of Botony	GGDC No.1 Abbuttabad	As Associate Professor (BS-19) of Botony at GGDC, Battagram	Vice SII64
66		GGDC Marghuz (Swabi)	As Associate Professor (BS-19) of Zoology at GFC-W, Peshawar	Vice S#67
67		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 (working against the upgraded post as result of 5	GGDC Bacha Klian (Peshawar)	As Lecturer (BS-17) of Pak-Studies at GGDC, Dargai, Charsadda	AVP
69	Ms. Shahnaz 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 Mursalcen, Lecturer (BS-17) of Zoology (working against the upgraded post as result of 5 Tier)	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, Thana, Malakand	As Associate Professor (BS-19) of Chemistry at GGDC, Tarkha, Noveshera	Vice S#72
72	Ms. Afsheen, Lecturer (BS-17) of Chemistry (working against the upgraded post as result of 5 Tier)	GGDC, Tarkin, Nowshera	As Lecturer (BS-17) of Chemistry at OGDC, Panjpir, Swabi	AVP
73	MsrShahida 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	GODC, 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, Mordan	As Associate Professor (BS-19) of Islamiyat at GGDC Pabbi (Nowshera)	Vice S#22

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Associate Professor (BS-19) of Khwar, Mardan (BS-19) of Khwar, Mardan (BS-19) of Feanamies at							
Mishan Professor (IR-19) of Molth Malha Malha (IR-19) of Malha to GODC, Khenpur, Alexiner (IR-17) of Malha to GODC, Khenpur, Alexiner (IR-17) of Malha to GODC, Dir Upper, Malakard (IR-19) of M	"	Dr. Nagina Bibl				<u>/</u> ė	
Als. Rum lebal. Lecturer (BS-17) of Maths Lecturer (BS-19) of Lecturer (BS-17) of Statistics L		Associate Professor to	OGDC V.				
Mail Name			Abbati.t.a I		Vice Si	277 \	(9)
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172	Ms Farhat Yasmeen Associate Professor (BS-19) of Statistics	GODC Mathra. Peshawar	Mathra, Peshawar At Associate Professor (IIS-19) of Statistics at	Vice S#91
93	Ms Shahnaz Mussarat Associate Professor (GS-19) Maths	GGDC Karak	As Associate Professor (BS-19) of Maths at GGDC, Zaryab Colony	Vice S#94
24	Ms. Sumera Anjum Assistant Professor (BS-18):	GGDC Zaryab of Colony Peshawar	Peshawar	AVP of BS-19 in OPS
-	Maths (working against the upgraded past as result of 5 Tier)	· ·	GGDC, Karak	Vice Sr#93
95	Ms Alia Aslam, Associate Professor (BS-19) Chemistry	of Nowshera	As Associate Professor (BS-19) of Chemistry at GGDC, Mathra, Peshawar	Vice \$496
96	Ms. Nida Bukharl, Associate Professor (BS-19) 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) (Mathematics	<u> </u>	As Associate Professor (BS-19) of Mathematics at GGDC, Hangu	Vice. 5#24
	Ms. Fatima Bibi, Associate Professor (BS-19) o Pak Study Ms. Zakia Minhas,		As Associate Professor (BS-19) of Pak Study at GGDC, Pabbi Nowshera	Vice S≅99
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í	Ms. Nahoed Begum, Associate Professor (BS-19) o slamiyat		As Associate Professor (BS-19) of Islamiyat at GGDC, Garhi Kapoora, Marda	AVP
2	fs. Ruqia Bibi, ssociate Professor (BS-19) oi ∞logy s. Fazeelat Zuhra,		As Associate Professor (BS-19) of Zoology at GGDC No.1, D.1 Khan	AVP
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Assoc Chem	<u></u>	GCGC Peshawar	As Associate Professor (BS-19) of Chemistry at GGDC No.1, Hayatabad, Peshawar	Vice S#10
Associ	celom Gul, atc Professor (BS-19) of al Science	GGDC No.1 Hayatabad, Peshawar	As Associate Professor (BS-19) of Political Science at GCGC, Gulbahar, Peshawar	Vice S#1

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- 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)

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

Dated Peshawar the 12th October, 2023

NOTIFICATION

NO.SO(C-III)/HED/1-6/PSB/2022: Consequent upon approval/NOC of Election Commission of Pakistan vide letter No.F.3(1)/2023-Els (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:-

	Name/Designation/BPS	From	To	'Remarks
S #	Mame/Designation/br3	4		
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	GGDC No.2 Hayatabad, Peshawar	GGDC Hangu	AVP
3.	(BS-19) Nadia Jamshed, Associate Professor of Computer	Under transfer to GGDC No.1 Hayatabad, Peshawar	GGDC Garhl Kapoora, Mardan	AVP
4.	Science (BS-19) 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 Against the
6.		Under transfer to GGDC No.1 Hayatabad, Peshawar	Retained at GFC (W), Peshawar	already occupied post
7.		Under transfer to GFC (W), Peshawar	GGDC Tarkha, Nowshera	Vice Sr. No.08
8.		Under transfer to GGDC Tarkha, Nowshera	GGDC Tank	AVP
9		Under transfer to GGDC Khanpur, Haripur	GGDC Mankaral, Haripur	AVP
10	Humaira Nousheen, Associate Professor of Pak	Under transfer to GCGC Peshawar	GFC (W), Peshawar	Vice Sr. No.11
211	Study (BS-19) Tahira Gul, Associate Prof.	GFC (W) Peshawar	GGDC Rustam, Mardan	AVP
12	01 7113101 (00 207	Under transfer to GCGC Peshawar	GGDC Gulshan Rehman Colony, Peshawar	Vice Sr. No.13

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	(220 Clare Lioi casor a.	Peshawar		
F	05110 100 201		GCGC Peshawar	Vice Sr.
. 5	Shabnam Nawaz, Associate	Ottost transier to	acac i camanar	No.15
` :	5(180) India (18-10)	GGDC Bacha Khan,		140.17
1	Professor of Urdu (BS-19)		i.	
1		Peshawar	GGDC Sawal Dher,	AVP -
_	Hadia Sald, Associate	GCGC Peshawar		ATV.
۱ i	Hadia Said, Associate		- Mardari	÷
1	Professor of Urdu (BS-19)			
		GGDC Mathra,	GGDC Sawal Dher,	AVP ·
. [Salma Rehman, Associate			
	Professor of Home	Peshawar	Mardan	
			Ì	
	Economics (B-19)		GGDC Saral	AVP .
7.	Razia Bibl, Associate	Under transfer to		****
1	Professor of Urdu (BS-19)	GGDC Lakki Marwat	Naurang, Lakki	
- {	140(6220) of dide (02-12)	3333	Marwat	
ļ			GGDC Dara Adam	* AVP
s. [Uzma Noreen, Associate	Under transfer to	·	ÚA.
٠, ا		GGDC No.3, Kohat	Khel, Kohat	
l	Professor of Botany (BS-	GGDC MOIS, MOINE	1,4,10,7	
- 1	19)			43.154
, {		Under transfer to !	GGDC Nowshera	AVP
9.	Shagufta Begum, Associate			Ì
Ì	Professor of Pashto (BS-	GGDC Nahaql,		}
1	19)	Peshawar	1	ļ
		Under transfer to	GGDC Serai Saleh,	AVP
Ō.	Faria Khan, Associate	1		1.
Į	Professor of Psychology	GGPGC No.1,	Haripur	1
ļ		Abbottabad 111	ł	
	(BS-19)		CCDC Dalicasi	AVP
11.	Humaira Afridi, Associate	Under transfer to	GGDC Dabgari,	746
	Professor of Zoology (BS-	GGDC Zaryab Colony,	Peshawar	ļ
	T		1. 537.7	İ
	19)	Peshawar		
2.	Saltanat Jehan, Associate	Under transfer to	GGDC Nowshera	AVP ·
۲.		CCDC Zancah Calony		ì
	Professor of Physics (BS-	GGDC Zaryab Colony,		
	19)	Peshawar	<u> </u>	
23.		Under transfer to	GGDC Havelian,	AVP
23.				
	Professor of Economics	GHEC Abbottabad	Abbottabad	1
	(BS-19)	· .		
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24,	Saltanat Begum, Associate	Under transfer to		1 200
	Professor of Islamiyat (BS-	GGDC Tajo Blbi,	Pirpai, Nowshera	
		Charsadda	, ,	•
	19)		CCDC D-L	AVP
25.	Sumera Anjum, Associate	Under transfer to	GGDC Paharpur,	AVP
	Professor of Mathematics	GGDC Thall, Hangu	D.I.Khan	1
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	(BS-19)			
26.	Nadia, Associate Professor	Under transfer to	GGDC Barikot,	AVP
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	of Botany (BS-19)	GGDC Dargal,	SWOC	
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יירו	Urana Approints Desformer		GGDC Zaida.	AVP
27.	, .	Under transfer to	GGDC Zaida,	AVP
27.	, .	Under transfer to	GGDC Zaida, Swabi	AVP
27.	Uzma, Associate Professor of Botany (BS-19)	Under transfer to 1 GGDC No.1,		AVP
	of Botany (BS-19)	Under transfer to 4 GGDC No.1, Charsadda	Swabi	
27. 28.	of Botany (BS-19)	Under transfer to 4 GGDC No.1, Charsadda	Swabi /, GFC (W),	Vice S
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	of Botany (BS-19) Nabeela Younas, Associat Professor of Botany (BS-	Under transfer to 4 GGDC No.1, Charsadda	Swabi /, GFC (W),	Vice S
28.	of Botany (BS-19) Nabeela Younas, Associat Professor of Botany (BS-19)	Under transfer to GGDC No.1, Charsadda e GGDC Zaryab Colony Peshawar	Swabi GFC (W), Peshawar	Vice Si No.29
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34.	Sabeen Kamal, Associate Professor of Zoology (BS-	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 Garhl 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

-Sá-SECRETARY HIGHER EDUCATION DEPARTMENT

ENDST: NO, & DATE EVEN:

Copy of the above is forwarded to the:

- 1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
- Director Higher Education, Khyber Pakhtunkhwa, Peshawar.
 Directors, Regional Directorates of Higher Education.
 Director-IT, HEMIS Cell, Higher Education Department.
 Principal, Govt. Colleges concérned.

- 6. District Accounts Officers, concerned.
- 7. PS to Secretary Higher Education Department.
- 8. Officers concerned.
- 9. Master File.

(SAMIÀ JABEEN) Section Officer (Colleges-III)





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.

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)

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Subject: APPEAL FOR TRANSFER CANCELLATION

It is stated that I have been transferred vide letter No. F3(1)/2023-Els 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), 1 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 Aljımad 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. GGDC Gulshan Rehman Peshawai

1. Principal GGDC Guishan Rehman Peshawar of Etudon G

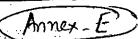
2. Director Higher Education Poshawar

PRINCIPALS

Gover Degree College.

Shahida Parveen Associate Professor of Pashto GGDC Guishan Rehman Peshawar

Dated: /10/2023



Directorate of Higher Education Khyber Pakhtunkhwa Rano Ghari, New Chamkani Chowk, Peshawar

Tel # 091-9214412 / 091-9214415

Facebook,com/dhekppeshawar

E-jiali- niskokussh@amail.com

CA-VESIE Branch/A-12/Ms. Shahida Perveen/ Pashto

Dated Peshawar the 12/10 /2023

Ta

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)

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Cost of Rs. 7000/- received in Service Appeal No. 221/2023, Titled Shahida Parveen vs. Highey Edu.

in the office of Assistant Registrar, Vide Order 05/12/23 Submitted on Dated: 02 / 01 /2021

Assistant Regist an Khyber Pakhtunkhwa Service Tribunal Peshawar