

1

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Appeal No. 1122/2019

Date of Institution ... 04.09.2019

Date of Decision ... 05.09.2019

Dr. Iffat Sultana, Principal BPS-19 GGCH SS No. 1 Abbottabad.
... (Appellant).

VERSUS

Government of Khyber Pakhtunkhwa through Secretary, Elementary & Secondary
Education Peshawar and three others. ... (Respondents)

Present.

Sardar Muhammad Irshad,
Advocate. ... For appellant

MR. HAMID FAROOQ DURRANI, ... CHAIRMAN

JUDGMENT

HAMID FAROOQ DURRANI, CHAIRMAN:-

1. In the instant appeal the notification dated 29.05.2019 has been assailed whereby the services of appellant were placed at the disposal of Directorate of Elementary & Secondary Education.
2. Learned counsel for the appellant heard and the available record gone through.
3. The memorandum of appeal as well as arguments of learned counsel revolve around the proposition that the impugned notification is against the posting/transfer policy of the Provincial Government issued on 28.02.2013. In that context, the judgment reported as PLD 2013-Supreme Court-195 has been relied upon.

4. The impugned notification does not require, by any means, the transfer of appellant and in effect provides for placement of her service at the disposal of Directorate of E&SE for further orders. Similarly, the District Education Officer (F) Abbottabad has been authorized through the impugned notification to look-after the affairs of the school but as temporary arrangement.

In the circumstances, when no final order of transfer/posting of appellant has been made by the competent authority the appeal in hand remains premature and is, therefore, dismissed in limine. It requires to be noted that the judgment of Apex Court, referred to by the learned counsel, is distinguishable in the facts and circumstances of appeal in hand.

File be consigned to the record room.



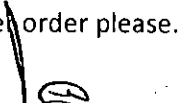
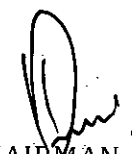
(HAMID FAROOQ DURRANI)
CHAIRMAN

ANNOUNCED
05.09.2019

Form- A
FORM OF ORDER SHEET

Court of _____

Case No.- 1122/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	04/09/2019	<p>The appeal of Dr. Iffat Sultana presented today by Sardar Muhammad Irshad Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR 4/9/19</p>
2-	05/09/19	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>05/09/19.</u></p> <p> CHAIRMAN</p>

**Before The Khyber Pakhtunkhwa Service Tribunal,
Peshawar**

CM No _____/2019

in

SA No _____/2019

Appeal No. 1122/2019

Dr. Iffat Sultana, Principal BPS 19 GGCH SS No.1
Abbottabad.....Appellant

V/s

Government of Khyber Pakhtunkhwa through Secretary Elementary and
Secondary Education and three (03) othersRespondents

INDEX

S.No	Description of Documents	Annexure	Page	Remarks if any
1	Service Appeal with Affidavit	-	1 - 6	-
2	Copy of Notification dated 27/10/2017	A	7 - 9	-
3	Copy of PTC's Letter Dated 14/05/2019	B	10 - 11	-
4	Copy of Agendas and Minutes of the Meetings	C	12 - 19	-
5	Copy of Appellant's letter dated 14/05/2019 addressed to Resp No.3	D	20 - 21	-
6	Copy of Impugned Notification dated 29/05/2019 along with better copy	E	22 - 23	-
7	Copy of Appellant's Departmental appeal dated 01/06/2019 along with reminder	F	24 - 27	-
8	Copy of Complaint in Civil Suit No 90/1 of 2019	G	28 - 31	-
9	Copy of order dated 01/06/2019 whereby stay was Granted in Appellant's favor	H	32	-
10	Copy of final order dated 06/07/2019 in civil suit No 90/1 of 2019	I	33 - 34	-
11	Copies of Medical Certificates for the Period from 2/8/2019 to 30/8/2019	J	35 - 41	-
12	Copy of office order, dated 03/06/2019 along with better copy	K	42 - 43	-
13	Copy of Notification dated 27/02/2013 of the Establishment Department Government of Kpk along with better copy	L	44 - 45	-
14	Stay applicant with affidavit	-	46 - 47(i)	-
15	Urgent Application for Early Hearing along with affidavit.	-	48 - 49	-
16	Vakalatnama	-	50	-

Appellant

Through:-



(Sardar Muhammad Irshad)
Advocated High Court

①

Before The Khyber Pakhtunkhwa Service Tribunal,
Peshawar

SA No. 1122 of 2019

Khyber Pakhtunkhwa
Service Tribunal

Dr. Iffat Sultana, Principal BPS-19 GGCH SS No.1 Aboottabad

Diary No. 1228

Appellant Dated 04/9/2019

V/s

1. Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Peshawar
2. Chief Secretary Government of Khyber Pakhtunkhwa, Peshawar
3. Director Elementary and Secondary Education Government of Khyber Pakhtunkhwa, Peshawar
4. District Education officer (Female) Government of Khyber Pakhtunkhwa Abbottabad Respondents

Appeal u/s 4 of Khyber Pakhtunkhwa Service Tribunal Act, 1974 against Notification No So(S/F) E & SED/4-16/2019/ Dr. Iffat Sultana/Principal/A/Abad, dated 29/05/2019 Whereby appellant's services were placed at the disposal of Respondent No 3, as OSD

PRAYER:

For declaring the impugned Notification dated 29/05/2019 as malafide, perverse, illegal, against transfer policy of respondent No.1 being based upon extraneous influence and consequently be cancelled.

Respectfully Sheweth:

This appeal arises in the backdrop of the following facts:-

FACTS

- 1- That the appellant has been working as principal at GGCHSS No.1 Abbottabad in BPS 19 Since Nov.2017 Copy of Notification dated 27/10/2017 whereby appellant was posted as such is annexure -"A" During her tenure she worked efficiently with dedication and devotion. She has been able to achieve 100% result in the SSC examinations conducted by the BISE Abbottabad and secured positions in curricular and co-curricular activities, through hard work and tireless efforts.
- 2- That GGPS Kareempura Situates inside the boundary wall of appellant's School and an incident of corporal punishment to a student took place in the said Primary School and a Video thereof was uploaded in the Social media. Resultantly, several officers of the

Filed to-day

Registrar

4/9/19

District Administration as well as Education Department paid repeated visits to the above School after passing through a temporary gate/door installed in a wall built up between the appellant's school premises and the office of Respondent No.4 which adversely affected the educational environment of the students over which the parents of the female students raised their voices.

- 3- That the appellant with a view to resolve the issue convened meetings of the Parents Teachers Council wherein it was resolved that the temporary gate/door installed in the wall between office of Respondent No.4 and appellant's School will be closed. In this regard the Proposal was sent by the Council to the Commissioner Hazara Division, Deputy Commissioner Abbottabad, District Police officer Abbottabad and District Nazim Abbottabad through their letter No.79-83, dated 14/05/2019. Copy of the said letter is annexure -"B" while copies of the minutes of the meetings and agendas are annexure -"C".
- 4- That the appellant through her letter No.821 dated 14/05/2019 sought guidance of Respondent No.3 over the above matter but no response thereto was made. Copy of the aforesaid letter is annexure -"D".
- 5- That the parents were pressing hard for closing the temporary gate/door having grave concern of the security and privacy of their daughters who were students of the school numbering 1400 and some of them were residing in the hostel. Keeping the sensitivity over security and protection of the female students the appellant raised a wall and closed the temporary gate/door over which Respondent No.4 infuriated and caused to collapse the wall and re-opened the gate/door. Respondent No.4 created a panic and mess in the school causing terror and fear amongst the female students. In this state of affairs the Parents of the students staged a public protest in the shape of rally against Respondent No.4 and also appeared before the District Administration with a demand to close the door between office and School for not only providing security to their daughter but also to keep intact their privacy. The rally ended on assurance of the Commissioner Hazara Division for doing the needful.
- 6- That Respondent No.1 and 2 at the instance of Respondent No.4 placed the appellant's services at the disposal of Respondent No.3 and directed Respondent No.4 to look after the affairs of the school through impugned Notification bearing No. S(S/F)E & SED/4-16/2019/. Dr.Iffat Sultana Principal/A/Abad, dated 29/05/2019, without assigning any reason.Copy of the said Notification is annexure-"E". The appellant filed departmental appeal/representation before Respondent No.1 against above Notification vide her appeal No.94, dated 01/06/2019 but no

response there against has so far been made to the appellant. Copy of department appeal is annexure-"F"

- 7- That appellant instituted Civil Suit No 90/1 of 2019 in the court of Senior Civil Judge, Abbottbad and temporary injunction was granted in appellant's favor vide order dated 01/06/2019 in above Civil Suit. The Injunction was extended from date to date when at last the plaint was returned under the provision of order 7 rule 10.CPC for want of Jurisdiction vide order dated 06/07/2019 copy of plaint is annexure-"G" while copies of aforesaid orders are annexure-"H" and "I" respectively. The appellant also filed writ petition before the Honorable Peshawar High Court, Bench Abbottabad which failed for want of Jurisdiction.
- 8- That the appellant availed summer vacations commencing from 01/07/2019 to 31/07/2019 when the schools remain closed throughout the province. Thereafter the appellant fell ill and availed medical leave for the period from 02/08/2019 to 30/08/2019. Copies of medical certificates are annexure-"J".
- 9- That the appellant's services were placed at the disposal of Respondent No.3 as OSD but no other principal has been transferred and posted in appellant's school at her place and the post is still vacant. The act of placement of appellant's service at the disposal of Respondent No.3 as OSD is malafide and contrary to transfer and posting policy of Respondent No.1, particularly when Shahida Mustafa a Junior Teacher of BPS -16 (SST) has been made Incharge of the School vide office order dated 03/06/2019(Copy annexure-"K")despite availability of other senior teachers. Hence this appeal inter alia on the following grounds:-

GROUND S

- i. That the Impugned notification is arbitrary, malafide and result of extraneous consideration as such cannot sustain.
- ii. That the Impugned notification is against the posting/transfer policy of the provincial Government contained in Notification, dated 27/2/2013 of the Establishment Department. Copy of the said Notification is annexure-"L".
- iii. That the impugned Notification is violative of the law laid down by the Honorable Supreme Court of Pakistan in case of Syed Mehmood Akhtar Naqvi and others v/s Federation of Pakistan and others (2013 SCMR 1) wherein it was held:-

"A report (C.M.A .No.4188 of 2012) has been filed on behalf of secretary Establishment wherein short term and long term reforms to protect the rights of Civil servants both in Federation and Provincial Government have been suggested. It is to be noted that these suggestions have been made in pursuance of earlier order in which it

was observed that secretary Establishment and all the Provincial Chief Secretaries shall make recommendations to improve and protect the rights as well as service structure of the Civil Servants. Apparently Civil Servants are required to implement/carry out lawful orders as it has been held by this Court time and again but such officers invariably are hindered not to follow the rules and regulations by the high-ups on account of their administrative or political influence which results in their arbitrary frequent transfers from one place to another or at times posting them as OSDs or without caring about the merit-cum seniority they are not awarded due posting over the junior officers or junior officials are given assignment of high responsibility due to which there is always heartburning and for so many other reasons instead of performing independently Civil Servants start looking for some favour in the administration as well as in the political arena as a result whereof good governance badly suffers.

Therefore, it is high time to recognize their fundamental rights vis-a-vis their talent considering as the Civil Servants are responsible to run the affairs of the Government according to the Constitution and law. It is also the requirement of the day that Government officials are treated for the purpose of promotion, transferring on merits or while placing them under suspension it must be kept in mind that as a punishment no one can be placed as OSD."

Similarly in case of Inita Turab's Case (PLD 2013 SC 195) it was held:-

"The principles of law enunciated herein above can be summarized as under:-

- i.
 - ii. Tenure, Posting and transfer: when the ordinary tenure for posting has been specified in the law or rules made thereon such tenure must be respected and cannot be varied , except compelling reasons, which should be recorded in writing and judicially reviewable.
 - iii.
 - iv. OSD. Officers should not be posted as OSD except compelling reasons, which must be recorded in writing and judicially reviewable, if at all an officer is to be posted as OSD such posting should be for the minimum period possible and there is a disciplinary inquiry going on against him, such inquiry must be completed at the earliest."
- iv. That the impugned Notification is against the principles of natural Justice and is against the interest of innocent students whose education has badly effected since the date of issue of the aforesaid Notification.

5


- v. That the impugned Notification is patently illegal, unlawful, void and coram-non-Judice being issued at the behest of Respondent No.4 without application of independent mind by the Competent Authority.
- vi. That the impugned Notification is violative of the principle that when law prescribed something to be done in a particular manner it must be done in that manner or not at all.
- vii. That there is no concept of OSD in civil service laws which too without any fault on the part of appellant.
- viii. That appellant belongs to teaching cadre while she has been posted in general cadre which cannot be done under the rules.
- ix. That despite elapsed of statutory period of 90 days appellant has not been informed about the fate of her appeal in violation of rule 5 of Khyber Pakhtunkhwa Civil Servants (Appeal) Rules, 1986 which by itself indicative of malafide in the minds of authorities.
- x. That respondent No.4 took shelter under local political figures to influence Respondent No.1 and 2 against Appellant.
- xi. That appellant's salary has been stopped out of malice on the part of Respondent No.4 having no lawful authority in the matter being appellant's Junior.
- xii. That Respondent No.4 directed to stop all welfare works being continued on the order of appellant for the betterment of the students which is suggestive of the malafide, personal grudge and hostility with the appellant.
- xiii. That appellant seeks leave of this Honorable Tribunal to agitate further grounds at the time of arguments.


It is , therefore , prayed that this Honorable Tribunal may graciously be pleased to accept this appeal set-a-side impugned Notification , dated 09/05/2019 and appellant be allowed to complete her normal tenure of posting in GGCM SS No.1 Abbottabad in the interest of Justice.

Any other relief which this Honorable Tribunal deems fit and proper in the circumstances of the case may graciously be awarded to the appellant.

 Appellant

Through:


(Nasir Saleem)
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The Mall, Abbottbad
No: +92334-1054951


(Sardar Muhammad Irshad)
Advocate High Court
236- Iqbal Shopping Complex
The Mall, Abbottbad
No: +92343-3326000

6

Before The Khyber Pakhtunkhwa Service Tribunal,
Peshawar

SA No. _____ of 2019

Dr. Iffat Sultana, Principal BPS-19 GGCH SS No.1 Aboottabad

Appellant

V/s

1. Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Peshawar
2. Chief Secretary Government of Khyber Pakhtunkhwa, Peshawar
3. Director Elementary and Secondary Education Government of Khyber Pakhtunkhwa Peshawar
4. District Education officer (Female) Government of Khyber Pakhtunkhwa Abbottabad Respondents

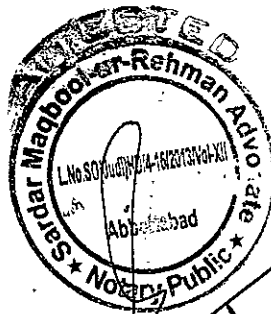
AFFIDAVIT

I, Dr. Iffat Sultana, appellant do hereby solemnly affirm and declare that the contents of the accompanying appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Tribunal.


Deponent

VERIFICATION

Verified on Oath at Abbottabad on 2nd day of Sep 2019 that the contents of above affidavit are true and correct to the best of my knowledge and belief.




Deponent



GOVERNMENT OF
KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

(7)

"A"

Dated Peshawar the October 27th, 2017

NOTIFICATION

NO. SO(S/F)E&SED/1-3/2017/PSB/Promotion/BS-18 to BS-19: In partial modification of this department notification of even No. dated 04-07-2017, the competent authority (Chief Minister Khyber Pakhtunkhwa) has been pleased to order the following posting/ transfer/ adjustments against the newly shifted posts, in the interest of public service:

S#	Name, Designation & Station	New Station	Remarks
1	Mst. Mussarat Jan, SS (English) GGHSS Comp: Peshawar	Instructor BS-19 RITE (F) Peshawar	Against newly shifted post
2	Mst. Rukhsana Perveen, Principal (BS-19) GGHSS Mandori Nowshera	Vice Principal (BS-19) GGCHSS Dabgari Garden Peshawar	Vice Sr. No. 28
3	Mst. Farhat Gul, Principal (BS-19) GGHSS Panjar Bunir	Principal (BS-19) GGHSS Hathian Mardan	Against vacant post
4	Mst. Fehmida Nasreen, Principal (BS- 19) GGHS Panyala D.I.Khan	Vice Principal (BS-19) GGHSS No. 2 D.I.Khan	Against newly shifted post
5	Mrs. Nighat Shaheen, Principal (BS- 19) GGHSS Tajazai Lakki Marwat	Principal (BS-19) GGHSS No. 3 D.I.Khan	-do-
6	Mst. Zohra Jabeen, Senior Instructor (BS-19) RITE (F) Swabi	Principal (BS-19) GGHSS Mang Haripur	-do-
7	Mst. Rizwana Saeed, Principal (BS- 19) GGHSS Lasan Nawab Mansehra	Vice Principal (BS-19) GGHSS Havelian A/Abad	-do-
8	Mst. Abida Shaheen, Principal (BS- 19) GGHS Bagra Haripur	Principal (BS-19) GGCMHS No. 1 Haripur	Vice Sr. No. 30
9	Mst. Anisa Gohar, Principal (BS-20) RITE (F) Dir Lower (own pay & scale)	Principal (BS-20) GGHSS Nishtarabad Peshawar	Against newly shifted post
10	Mst. Saad Rana, Principal (BS-19) GGHSS Matta Palangzai Charsadda	Vice Principal (BS-19) GGHSS Jogiwara Peshawar	-do-
11	Mst. Naheed Akhtar, Senior Instructor (BS-19) RITE (F) Kohat	Senior Instructor (BS-19) RITE (F) Peshawar	-do-
12	Mst. Sarwat Bano, Principal (BS-19) GGHSS Mandani Charsadda	Principal (BS-19) GGHSS No. 2 Peshawar Cantt	-do-
13	Mst. Shahida, Principal (BS-19) GGHSS Topi Swabi	Vice Principal (BS-19) GGHSS Chamkani Peshawar	-do-
14	Mst. Maryam Nazneen, Principal (BS- 19) GGHSS Shakardara Kohat	Vice Principal (BS-19) GGHSS Nothia Peshawar	-do-
15	Mst. Zubaida Nasim, Senior Instructor (BS-19) RITE (F) Swabi	Vice Principal (BS-19) GGHSS Kot Najibullah Haripur	Against newly shifted post
16	Mst. Nusrat Iqbal, Senior Instructor (BS-19) RITE (F) Dir Lower	Vice Principal (BS-19) GGHSS KTS Sector 2 Haripur	-do-
17	Mst. Rukhsana, Principal (BS-19) GGHS Kot Malakand	Principal (BS-19) GGHSS Hattar Haripur	-do-
18	Mst. Saima Asghar, Principal (BS-19) GGHSS Parhena Mansehra	Principal (BS-19) GGHS Khuthiala A/Abad	-do-
19	Mst. Saira Begum, Principal (BS-19) GGHSS Totalai Bunir	Principal (BS-19) GGHSS Ziarat Kaka Sahib Nowshera	-do-

Accepted

S#	Name, Designation & Station	New Station	Remarks
21	Mst. Farsia Malik, Senior Instructor (BS-19) RITE (F) Dir Lower	Principal (BS-19) GGHS Khal Haripur	-do-
22	Mst. Kaniz Fatima, Principal (BS-19) GGHS Ouch Dir Lower	Principal (BS-19) GGHS Badwan Dir Lower	-do-
23	Mst. Shakila Begum, Principal (BS-19) GGHS Barikot Swat	Principal (BS-19) GGHS Chakdara Dir Lower	Against vacant post
24	Mst. Nazia Khanam, Principal (BS-19) GGHS Nagri Payyen Dir Lower	Senior Instructor (BS-19) RITE (F) Peshawar	Against newly shifted post
25	Mrs. Neelofar Nazif, Principal (BS-19) GGHS Samar Bagh Dir Lower	Vice Principal (BS-19) GGHS Tarnab Farm Peshawar	-do-
26	Mst. Nighat Sultana, Principal (BS-19) GGHS Ogai Mansehra	Senior Instructor (BS-19) RITE(F) A/Abad	-do-
27	Mst. Robina Afza, Principal (BS-19) GGHS Titar Khel Lakki Marwat	Principal (BS-19) GGHS Mitapur D.I.Khan	-do-
28	Mst. Toheed Begum, Vice Principal (BS-19) GGHS Comp Peshawar	Vice Principal (BS-19) GGHS Ladygrifh Peshawar	-do-
29	Mst. Razia Sultana, Principal (BS-19) GGHS Nishtar Abad Peshawar	Vice Principal (BS-19) GGHS Nishtar Abad Peshawar	-do-
30	Mst. Robina Shabnam, Principal (BS-19) GGCMHS No.1 Haripur	Principal (BS-19) GGHS Serai Saleh Haripur	Vice Sr. No. 31
31	Mst. Samina Mushtaq, Principal (BS-19) GGHS Serai Saleh Haripur	Principal (BS-19) GGHS Bagra Haripur	Vice Sr. No. 8
32	Mst. Dr.Iffat Sultana, Principal (BS-20) RITE (F) Manshera	Principal (BS-19) GGHS No.1 Abbottabad	Vice Sr. No. 33
33	Mst. Samina Altaf, Principal (BS-19) GGHS No.1 Abbottabad	Principal (BS-20) RITE (F) Manshera	Vice Sr. No. 32
34	Mst. Tehmina Aslam, Vice Principal (BS-18) GGHS Chamkani Peshawar	SS BS-18 GGHS Chamkani Peshawar	Against Vacant post
35	Mst. Naeema Ambreen Vice Principal (BS-18) GGHS No.2 D.I Khan	SS BS-18 GGHS No.2 D.I.Khan	Against Vacant post
36	Iffat Begum Vice Principal (BS-18) GGHS BSD Peshawar	SS General (BS-18) GGHS Comp Peshawar	Vice Sr. No. 37
37	Naheed Begum SS Bio (BS-18) working against SS General post GGHS Comp Peshawar	SS Bio (BS-18) GGHS University Town Peshawar	Against Vacant post
38	Mst Noshaba Vice Principal (BS-18) GGHS Lady Grifh Peshawar	SS General (BS-18) GGHS Comp Peshawar	Vice Sr. No. 39
39	Mst. Shehreen SS (Economics) BS-18 working against SS (General) post at GGCHSS Peshawar	SS (Eco) BS-18 GGCHSS Peshawar	Against vacant post
40	Mst. Syeda Mufeed Vice Principal (BS-18) GGHS Jogiwarra Peshawar	SS (Eco) BS-18 GGHS University Town Peshawar	Against vacant post
41	Mst. Kausar Parveen Principal (BS-18) GGHS No. 3 D.I.Khan	Vice Principal (BS-18) GGHS No. 3 D.I.Khan	Against newly redesignated post
42	Mst. Misbah Raizan Vice Principal (BS-18) GGHS Havelian A/Abad	SS (BS-18) GGHS Havelian A/Abad	Against vacant post
43	Mst. Bibi Sajida Principal (BS-18) GGHS Khuthiala A/Abad	Vice Principal (BS-18) GGHS Khuthiala A/Abad	Against newly redesignated post

Handwritten signature/initials

S#	Name, Designation & Station	New Station	Remarks
44	Mst. Fakhria Jabar Vice Principal (BS-17) GGHSS Kot Najibullah Haripur	SS (BS-18) GGHSS Kot Najibullah Haripur	Against vacant post (in her own pay & scale)

2. No TA/DA allowed. ✓

SECRETARY

Endst: of even No. & date:

Copy forwarded to the:

1. Secretary Finance Department Peshawar alongwith copy of summary alongwith (F/E) of the summary duly approved by the Chief Minister Khyber Pakhtunkhwa for formal concurrence of the shifted posts so that salaries of the ladies concerned may not suffer, please.
2. Accountant General Khyber Pakhtunkhwa, Peshawar.
3. Director E&SE Khyber Pakhtunkhwa, Peshawar.
4. District Education Officers (Female) concerned.
5. District Accounts Officers concerned.
6. In charge EMIS, E&SE Department for uploading on official website.
7. Section Officer (B&A) E&SE Department alongwith approved summary for further necessary action.
8. PS to Secretary E&SE Department.
9. Principals/ Vice Principals/ Instructors & Subject Specialists concerned.
10. Office order file.

Encl: as above:



(ANEELA FAHIM)
SECTION OFFICER (SCHOOLS FEMALE)

Checked
[Signature]

- ۱۔ ضابطہ سروس سب ڈویژن ایف آباد
- ۲۔ ضابطہ ڈپٹی سروس سب ڈویژن ایف آباد
- ۳۔ ضابطہ DPO سب ڈویژن ایف آباد
- ۴۔ ضابطہ ضلع ناظم سب ڈویژن ایف آباد

تاریخ 14 مئی 2023
79-33

مذکورہ درخوات پر ادقاری کنڈھا ہے

ضابطہ ۱
مصلحہ PT کونسل CMSSS ایف آباد سکول ہذا کو درپیش سیکورٹی کے
ضد مسائل اور آگاہ کر رہی ہیں جو مذکورہ ذیل ہیں۔

CMSSS ایف آباد سکول کے چوک سرخ پورہ میں واقع ہے سکول میں 1400 سے زائد
طالبات زیر تعلیم ہیں سکول میں بائیس مہینے میں (15) کے قریب طالبات قیام پذیر ہیں جس سے
سکول ہذا کی چار دیواری کے اندر (1) سیرٹیفائیڈ اسکول اور ڈسٹرکٹ ایجوکیشن آفیسر زمانہ کا دفتر
میں موجود ہے۔

ضد روز قتل سکول کی چار دیواری کے اندر CMS ایف آباد سکول کے چوک سرخ پورہ میں واقع ہے سکول میں 1400 سے زائد
طالبات زیر تعلیم ہیں سکول میں بائیس مہینے میں (15) کے قریب طالبات قیام پذیر ہیں جس سے
سکول ہذا کی چار دیواری کے اندر (1) سیرٹیفائیڈ اسکول اور ڈسٹرکٹ ایجوکیشن آفیسر زمانہ کا دفتر
میں موجود ہے۔

ضد روز قتل سکول کی چار دیواری کے اندر CMS ایف آباد سکول کے چوک سرخ پورہ میں واقع ہے سکول میں 1400 سے زائد
طالبات زیر تعلیم ہیں سکول میں بائیس مہینے میں (15) کے قریب طالبات قیام پذیر ہیں جس سے
سکول ہذا کی چار دیواری کے اندر (1) سیرٹیفائیڈ اسکول اور ڈسٹرکٹ ایجوکیشن آفیسر زمانہ کا دفتر
میں موجود ہے۔

اس دوران سکول میں زیر تعلیم طالبات کا اندر لیسے عمل سرخ پورہ
جس میں ان کے متعلقہ طور پر منسلک تمام دفاتر اور سکول کے درمیان جو عارضی دروازے ہیں اسے
انہی کا کمر بند بنایا جائے گا تاکہ DEO کا دفتر ضلع بھر کا دفتر کے اکثر اوقات اس درمیان
چلے گا۔ مذکورہ قرارداد کی کاپی 25/19 کو DEO کو ارسال کی گئی ہے جس سے
سکول میں لیسے لیا گیا ہے۔ اس دوران سکول میں سکول اور دفتر کے درمیان
نے حضرت محترمین کی ایک دستاویز DEO کے روپر پر کونسل کے جملہ حجب ان

Amended
[Signature]

نے سمیت تحفظات P المبارکیا۔ کونسل نے اپنے مفصلہ کے مطابق 19/12/19 بروز اتوار کو
 سکول میں تعلیم کی وجہ سے دروازہ کی کھلم کھلا رکھ دی۔ نسل تاریخ 19/12/19 کو DEO
 ریاناہ باسمن بھوں کو تحفظ فراہم کرنے کی بجائے نقصان پہنچانے پر اتر آئی اور سکول
 قند کر حکم دیا کہ دروازہ کو قورڈوں سے بند کر دیا اور فوراً قورڈ دی جب کہ سکول
 میں موجود طالبات نے شور مچانا شروع کر دیا اور سمیت خوف وراس میں پناہ لیا جب کہ
 کونسل کے مہران بھی سکول پہنچ آئے اور والدین بھی سکول پہنچ آئے۔

DEO ریاناہ باسمن کی اس حرکت پر سکول میں زمر تعلیم طالبات کا تعلیمی عمل
 سے مزید متاثر ہوا۔ استدہ از میں سکول کے اساتذہ صالح اور محکروں پر DEO نے قہر
 لکھ رکھا ہے جس سے تعلیمی عمل میں رکاوٹ ہے۔

آئیے اس سلسلے میں DEO ریاناہ باسمن کے اس عمل کی تحقیقات
 کی جائے اور اسے ادارہ میں زمر تعلیم طالبات کو تحفظ فراہم کیا جائے۔

عبد مہران، PTC کونسل، GGCMSS، اسلام آباد

SECRETARY PTC
 GGCMSS No. 1
 Abbottabad
 CHAIRPERSON PTC
 GGCMSS No. 1
 Abbottabad.

سیکرٹری کونسل -
 چیئر پرسن کونسل -
 مہران

- محمدہ بی بی
- ارشاد بی بی
- رزیم
- رضسانہ بی بی
- نہت زراف

(Handwritten signature)

Attested *(with signature)*

وقت 10:30 AM مورخہ 19-4-2019 بروز جمعہ برقام گورنمنٹ گریز سینٹریل ماڈل سکول ڈی ایجنڈا سکول نمبر 1 ایسٹ آباد

- 1 گورنمنٹ گریز پرائمری سکول کی شہجیرز کی Net پروائٹل کی گئی ویڈیو کے حوالے سے
- 2 سکول اور DEO آفس کی مشترکہ دیوار کی اونچائی سیکورٹی کے حوالے سے
- 3 DEO آفس اور سکول کی مشترکہ دیوار میں موجود گیت ختم کر کے دیوار بنانے
- 4 کے بارے میں تجاویز
- 5 اضافی نکتہ جات کی تعمیر سے متعلق ممبران کی بات چیت

ذمہ داریاں	فیصلہ	ایجنڈا
اس حوالے سے ممبران نے	چیمبر پرسن صاحبہ داخلہ ہم کے سلسلے میں سناہ رواں ہیں	1
ذمہ داریاں نبھانے کا عہد کیا	سلسل سکول آئی ہیں اور سکول کے ارد گرد کے حالات سے	
	سلسل سیکرٹری صاحبہ کو آگاہ کر لی ہیں اس دوران گورنمنٹ	
	گریز پرائمری سکول پر یہ پورہ جو کہ سکول خدائی جار دیواری کے	
	اندرونی موجود ہے وہاں شہجیرز کی دیوار جو سوشل میڈیا پروائٹل کی	
	گئی کا واقعہ رونما ہوا لیکن فکے ہیں۔	
تمام ممبران نے ذمہ داریاں نبھانے	تمام ممبران چیمبر پرسن سکول اور DEO آفس زمانہ کی مشترکہ دیوار کو اونچائی	2
کا عہد کیا۔	کی تاکید کی۔ کیونکہ آفس میں ہر وقت ہر طرح کے لوگوں خاص کر مردوں کا	
	آتا جاتا ہے جو کہ سیکورٹی اور بچوں کے غائب ہونے کے پیش نظر یہ	

دستخط چیمبر پرسن اصدر
 دیوار اونچی کی جانے اور زریسیائی دروازہ ختم کر کے دیوار بنا کر جانے۔
 سلسل سکول پر یہ پورہ جو کہ سکول خدائی جار دیواری کے
 اندرونی موجود ہے وہاں شہجیرز کی دیوار جو سوشل میڈیا پروائٹل کی
 گئی کا واقعہ رونما ہوا لیکن فکے ہیں۔

(تمام ممبران کے دستخط ہونے)

		نگیت	Ayeshah	Shazia	
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کارروائی اجلاس

13

07

حاضر ممبران

08

کل ممبران

15

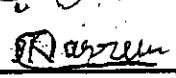
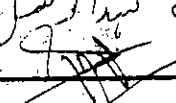
اجلاس نمبر

بوقت 11:45 Am مورخہ 22-4-2019 بروز سوموار مقام گورنمنٹ گریڈ سینیٹیل ماڈل سیکولری

ایجنڈا سکول نمبر 1 (ایبٹ آباد)

1	اضافی کمرہ جات کی تعمیر کی تکمیل
2	ایجنٹس مباحث کی پیش کردہ رپورٹ پر بات چیت
3	
4	
5	

ایجنڈا	فیصلے	ذمہ داریاں
1-	سیکرٹری صاحبہ نے کونسل کو اضافی کمرہ جات کی تعمیر سے متعلق تفصیلاً آگاہ کیا۔ سیکرٹری صاحبہ نے شرکاء کو بتایا کہ گزشتہ اجلاس میں سر راجہ جمیل مشتاق DDEO ایبٹ آباد کی فوری طور پر نوکریاں کے بجائے اور ایجنٹس مباحث نے خصوصی شرکت کی اور متفقہ فیصلہ کر کے	اجلاس میں شرکاء کو کونسل نے فیصلہ کے بعد کمرہ جات کی تعمیر
	تھیکس اور دیگر سہولتوں کو ایک ہی جگہ پر رکھا جائے تاکہ وہ کمزور کی تعمیر مکمل کرنے تاکہ سکول میں زیر تعلیم طالبان کی مشکلات کم ہوں جبکہ نئے داخلوں کا دباؤ دن بیلان بڑھ رہا ہے۔	ذمہ داری لی اور رپورٹ DEO
2-	ایجنٹس مباحث نے اپنی رپورٹ میں P.T.C کو کونسل کی غفلت کا ذکر کیا ہے۔ اجلاس میں بحث کے بعد فیصلہ کیا گیا کہ P.T.C کو کونسل سکول ہڈا کی وہاں سے نوکریاں فراہم کر کے نوکریاں کے لئے اور کام مکمل کر کے کھینچے تاکہ اس سے لہذا کونسل اس الزام کو مسترد کر سکی ہے۔	ذمہ داری لی اور رپورٹ DEO

دستخط چیئر پرسن اصدر  دستخط جنرل سیکریٹری 

(تمام ممبران کے دستخط ہوئے)

گورنمنٹ	22/4/19	15	08	07
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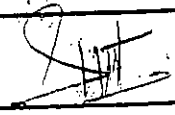
Attached 

بوقت 10:30 Am مورخہ 25-4-2019 بروز جمعرات بمقام گورنمنٹ گمر ٹرینینگ ایڈوانسڈ اسکول سکندری

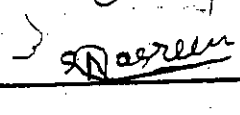
ایجنڈا
سکول نمبر 1 ایڈوانسڈ

1	اضافی کمرہ حیات کے تعمیراتی کام کی تکمیل
2	سکول اور دفتر کے درمیان دیوار کے دروازے کا خاتمہ
3	
4	
5	

ذمہ داریاں	نیلے	ایجنڈا
		①
	سکول ٹری کونسل کی اجلاس کے شہ کاد لیا اضافی کمرہ حیات کے کونسل کے فیصلے کے بعد تمام ممبران تعمیراتی کا بنایا کونسل کی باس کمرہ قرار داد اور (PED) انچارج اور چیئر پرسن نے تعمیراتی کام کی کے نوٹس میں بلا کر اضافی کمرہ حیات کی تعمیر کا ٹھیکہ بند عمل ٹھیکہ کی ذمہ داری خود سنبھالنے	
	ٹھیکہ کیار کو دیا گیا ٹھیکہ دار کو کام کے آغاز پر (Work Plan) دیا گیا جس کا فیصلہ کیا چیئر پرسن نے کی روشنی میں اسے اسٹارٹ پر ہوا کیا۔ PTC کونسل کے اجلاس میں دلچسپی لیتے ہوئے خود کام	
	مسطوحی دی گئی سفارشات کے مطابق ٹھیکہ دار اور وقت اور ٹھیکہ دار کی ٹیمیں لیکن بہر وقت مکمل کردار کی یقین	
	ٹھیکہ دار سفارشات پر پورا اتر سکا اسے متعلقہ کارکن اور کونسل میں (PED) دیا گیا کمرہ والی	
	انچارج کو سنبھال لیا جاتا رہا اور آگاہ کیا جاتا رہا۔	
	تعمیراتی کام کی تکمیل میں تاخیر سے طالبانہ کو شدید دشواری کا سامنا ہے	

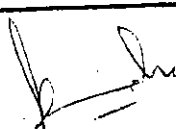


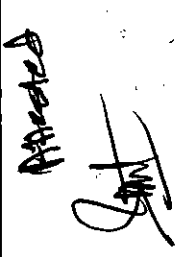
(PTO)
دستخط جنرل میگزنی



دستخط چیئر پرسن اصدر

(تمام ممبران کے دستخط ہوتے)

Riffat		نگینہ	Agarwal	Bhazig	Fadhila
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وقت 10:30 Am مورخہ 25-4-2019 بروز جمعرات برقام گورنمنٹ گھریٹھ ہائی اسکول

(ایبٹ آباد)

ایجنڈا

1 تعمیراتی کام سے متعلق کی گئی پھل پینٹنگ کا حوالہ

2

3

4

5

ایجنڈا	نقطہ	ذمہ داریاں
1-	4 مارچ 2019 کو ہونے والے اجلاس میں انجمن نے ناقص اور غیر معیاری تعمیراتی کام کی نشاندہی کی اور تعائن دور کرنے کی تاکید کی۔	
2-	4 مارچ 2019 کو ایک ماہ گزرنے کے بعد کام کا ازب نو جائزہ لیا گیا لیکن کوئی ترمیم نہ ہوئی۔	
3-	15 مارچ 2019 کو ہونے والے PTC کے اجلاس میں (DC) ایبٹ آباد کا حوالہ موجود ہے۔	
4-	چونکہ نئے تعلیمی سال میں طالبات کی مشکلات کے پیش نظر کونسل نے تعمیراتی کام کو خود گروانے کا فیصلہ کیا۔	
5-	25 مارچ کو PTC اجلاس میں پھر اعداد کیا گیا کہ تعمیراتی کام تکمیل آ رہی ہے بجائے کونسل خود گروانے۔	
6-	4 اپریل 2019 میں ہونے والے اجلاس میں سب سے پہلے گئے فیصلوں پر سختی سے عمل پیرا ہونے کی یقین دہانی کرائی۔	
7-	19 اپریل 2019 کو ہونے والے اجلاس میں پرائمری سکول کمریم پورہ کے شیجرز کا ورڈ لیو وائٹل ہونے اور سکورٹی کے پیش نظر سکول اور ڈی۔ او آفس کے درمیان دلیوار میں سے داخلہ	

دستخط جنرل سیکرٹری

دستخط چیئر پرسن اصدر

(تمام ممبران کے دستخط ہونے)

Riffat		Shahida	Asghar	نگت	Zahida
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کارروائی اجلاس

(5)

(16)

اجلاس نمبر 16 کل ممبران 08 حاضر ممبران 08

بوقت 10:30 Am مورخہ 25-4-2019 بروز جمعرات بمقام گورنمنٹ ہسپتال ماڈل سیکنڈ

سکول فیصلہ ایبٹ آباد

ایجنڈا

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2
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ایجنڈا	فیصلے	ذمہ داریاں
	دروازے کو ختم کرنے اور اضافی کمرے بنانے کی تعمیر سے متعلقہ بات چیدہ سوچی اور اپنے پچھلے فیصلوں اور ذمہ داریوں کا اعادہ کیا گیا	
	22 اپریل 2019 کو ہونے والے اجلاس میں ٹھیکہ داروں کی غفلت اور لائبریری کو حد نظر رکھتے ہوئے تمام کونسل نے سختی سے کام کو بہ وقت مکمل کرنے کیلئے خود ذمہ داری لی اور جسٹس بیرن نے اپنی نگرانی میں کام مکمل کرنے کا فیصلہ کیا اور ذمہ داری لی	
②	19-4-2019 کی میٹنگ کے حوالے سے کونسل نے مسئلہ ٹی صا ص سے عمل طاب کے حوالے سے پوچھا جس میں سکول اور دفتر کے تمام ممبران اور جسٹس بیرن درمیان موجود داخلی دروازے کو ختم کرنے کا مطالبہ کیا گیا تاکہ انہی ذمہ داریاں سنبھالنے کا فیصلہ کیا	
	جسٹس بیرن کی وجہ سے مسئلہ ٹی صا ص کا کوئی مسئلہ درپیش نہ آئے	

اس میٹنگ کی کارروائی کی کاپی ڈی ایچ آف آفس زمانہ کو ارسال کی جاتی ہے۔
دستخط چیئر پرسن اصدر
دستخط جنرل سیکرٹری

(تمام ممبران کے دستخط ہوئے)

Riffat	Zahiba					Ayesha
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Attested
[Signature]

07

حاضر ممبران

08

کل ممبران

17

اجلاس نمبر

وقت 11:15 AM مورخہ 4-5-2019 بروز جمعہ
 مقام گورنمنٹ گریجویٹ سائنس کالج سیٹھری
 ایجنڈا سکول نمبر 1 ایسٹ آباد

- 1 نئے تعلیمی سال 2019-2020 میں سونے والے نئے داخلوں پر بات چیت
- 2 اضافی کمرہ جات کی تعمیر کے بارے میں گفتگو
- 3 سکول فنڈ اور DEO (F) آفس کے درمیان دلیا میں داخلی دروازے
- 4 سے متعلق کونسل کی رائے
- 5

ایجنڈا	نیچے	ذمہ داریاں
1	نئے تعلیمی سال 2019-2020 میں سونے والے نئے داخلوں پر بات چیت	تمام کونسل کے ممبران
	اطلاعات کے داخلے کرنے میں چھٹا سائنس کلاس کے تمام	تنگ آٹھارون کے افسر، داخلی
	سکولوں میں سے زیادہ سے اب طالبات کی اتنی تعداد کو شہر کے کالج اور ایس ایچ ایس کے ذریعہ	
	کھلے جگہ اور فرنیچر کی کمی کا سامنا ہے ناسٹل میں بھی کچھ	تعمیرات کا افسر
	سے زیادہ داخلے کرنے اور سٹریٹ لائٹ کی مرمت کی	
	گھاس میں سیکرٹری کونسل نے تقریریں کی ہیں اور	
	ممبران کو آگاہ کرنا	
2-	اضافی کمرہ جات کی تعمیر سے متعلق P.T.C کونسل نے	
	سیکریٹری کونسل سے اور 2019-2020 کے اجلاس میں	

دستخط جنرل سیکرٹری

دستخط چیئر پرسن صدر

(تمام ممبران کے دستخط ہونے)

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Partially

اجلاس نمبر _____ کل ممبران _____ حاضر ممبران _____
 بوقت _____ مورخہ _____ بروز _____ بمقام _____

ایجنڈا

1
2
3
4
5

ایجنڈا	فیصلے	ذمہ داریاں
	کلیے فیصلوں کے مطابق ممبران کو سوسٹی آئی ذمہ داروں تمام ممبران سے ایسی	
	کے حوالے سے بات چیت ہوگی۔ اور مسلسل ہونے ذمہ داروں سمجھنے کا اعادہ	
	والے احکامات کی مالی (DEO(F) آفس کو حوالہ ارسال کیا۔	
	کرنے کی تاکید کی۔	
3	سکول اور (DEO(F) آفس کی درمیان دلواریں موجود	سنگھنہ ٹری کونسل کے تمام
	داخلی دروازے کو حوالہ ارسال ہوئے کی تاکید کی	ممبران اور ممبران کے
	راکھ جانے کی سکورٹی کے حوالے سے والدین کے قریب	تحفظات کو ذرا دن کے اندر
	دور سے آئے ان تمام ممبران کی مالی تمام P کو سوسٹی	دور کرنے کی ذمہ داری ملی
	کے فیصلوں کے مطابق (DEO(F) آفس کو حوالہ ارسال ہوئی	

دستخط جنرل میگزنی

دستخط چیئر پرسن امداد

(تمام ممبران کے دستخط ہونے)

	نگیت	Shayiq	Ayesha	Riffet
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Altered

بمقام گورنمنٹ برائے نیشنل ماڈل سکولز
ممبر ایسٹ آباد

بوقت 9:30 Am مورخہ 2019-5-14 بروز ~~مکمل~~

ایجنڈا

1	بینکائی اجلاس
2	ڈی۔ ای۔ او ریزرو کی جانب سے پرودہ دلوار کی نوٹیفیکیشن کی مذمت
3	
4	
5	

ایجنڈا	نقطے	ذمہ داریاں
1	سیکرٹری PTC کو نسل کی اجلاس کے شرکاء کو بریفنگ گزشتہ اجلاس کے فیصلے پر عمل درآمد سے متعلق آگاہ کیا۔ کو نسل کے گزشتہ اجلاس میں پاس کردہ قرارداد کے مطابق سکول اور دفتر کے درمیان دلوار میں داخلی دروازے کا خاتمہ کرنے کے لیے دلوار لگانے کی جسکو DEO(F) رومانہ پاسس نے انا کا مسئلہ بنالیا اور کو نسل کے فیصلے کو لغو کرتے ہوئے 14 مئی 19ء کو یہ دلوار گرا دی جس پر کو نسل میں سخت تشویش پائی جا رہی ہے۔ 2- کو نسل DEO(F) کے غیر اخلاقی اقدام کے خلاف متفقہ طور پر تیار کردہ منظوم کرتی پر اور نظام بالا سے مطالبہ کرتے ہوئے PTC کو نسل یا اختیار سے نو سکولوں سے PTC کو نسل ختم کر کے الغرض کو نسل ختم کر کے۔ اگر نظام بالا PTC کو نسل کو فعال میں تو ایسی ایسے فیصلوں پر عمل درآمد کا مکمل اختیار دیا جائے۔ دستخط چیئر پرسن اصدر <i>Nasir</i> دستخط جنرل سیکرٹری	تمام PTC کو نسل نے DEO(F) کے خلاف متفقہ قرارداد منظور صاحب کمرش صاحب بزارہ ڈپٹی کمرش صاحب ایسٹ آباد، DP اور ضلع منظم ایسٹ آباد

[Signature]

(تمام ممبران کے دستخط ہوئے)

Ranala	کامیاب	نگت	Chida	Alia	Alia
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pastor
[Signature]

20

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OFFICE OF THE PRINCIPAL GOVT :GIRLS CENTENNIAL MODEL SCHOOL NO 1
ABBOTTABAD

No : 84

Dated :14/05/2019

TO

The Director

(E&SE) Khyber Pakhtunkhwa Peshawar.

SUBJECT: Request for worthy Guidance & Help

Respected Sir,

With profound reverence it is stated that undersigned is going to bring your attention towards a sensitive issue which happened in GGCMSS NO 1 ATD which is located in vicinity of kareem pura & is adjacent to DEO Female office.

GGCMSS NO 1 has always maintained the progress in both curricular & co-curricular activities. In running session students gave 100% result in SSC Annual examination & got positions in curricular activities as well now through planned propaganda & conspiracies, progress of school is being deteriorated.

Due to problem arise in Kareempura primary school, related to corporal punishment many officers visited in GGCMSS NO 1 throughout the week. Due to the above mentioned reason, school environment was badly interrupted which already effected the teaching learning process & left negative repercussions on the students as well.

After kareem pura primary school incidence ,during PTC meetings held on 19/04/2019 ,22/04/2019 , 25/04/2019 & 04/05/2019 PTC during which chairperson & PTC member's several times raised this issue to remove the temporary door between school yard & DEO Office .Which was implanted by Ex-DEO female Samina altaf for her convenience as she was staying in the hostel with her family.

[Handwritten signature]

68
17-5-19


PA, DDB, WFF
Dp. No. 68-5
Date: 17-5-19

[Handwritten note]
Noted
[Handwritten signature]

Copies of forwarded applications by PTC members & chairperson are attached with application, in response their complaint undersigned ensured them that I will remove this door & so I did it ,as this door was used by the office personnel's as well which also results disturbance in the school having 1400 female students .This door was also a threat in sense of security .

Hence accordingly the door was removed by the undersigned But regret to say that DEO female Rehana Yasmin ,instead of providing security to the institute created mess in the school, then she tumbled the said wall. She created the panic to such an extent that student harassed. After collapsing the wall.

The School staff and almost 1400 students were totally insecure. With deep regret your good self is requested to please visit the institute in question and provide the guidance. As the said institute is severely insecure and I am totally helpless in front of worthy DEO Female. Video recordings of mess created by DEO Female are here with me which can be provided for the proceedings of inquiry.


(Dr. Iffat Sultana)
Principal (BPS-19)
GGCMSS No. 1 Atc.
Principal
Dr. Iffat Sultana
GGCMSS NO 1
Abbottabad.

Serial No. 620
17-05-19

Copy forwarded to the :
PS to Education Minister Khyber Pakhtun Khawa
PS to Secretary of E&SE Khyber Pakhtun Khawa

17/5/19
17-5-19

17/5/19



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone: 091-9210480, Fax # 091-9211419

Dated Peshawar the May 29th, 2019

NOTIFICATION

No. SO(S/E)E&SED/4-16/2019/Dr. Iffat Sultana/Principal/A/Abad: Consequent upon the approval of Competent Authority; the services of Dr. Iffat Sultana (BS-19) Principal GGCMHS No. 1 Abbottabad are hereby placed at the disposal of Directorate of E&SE with immediate effect.

2. Consequent upon the above, District Education Officer (Female) Abbottabad is authorized to look after the school affairs till further orders.

SECRETARY
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Copy of even No. & date:

Copy forwarded to the:

1. Accountant General Khyber Pakhtunkhwa, Peshawar.
2. Director E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Female) Abbottabad.
4. District Accounts Officer Abbottabad.
5. In-charge EMIS, E&SE Department for uploading at official website.
6. PS to Secretary E&SE Department.
7. Principal concerned.
8. Office order file.

Annex (P)

30/5

(Signature)
(GULRUKH)
SECTION OFFICER (SCHOOLS FEMALE)

Noted
(Signature)

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
 Block-"A" Opposite MPS's Hostel, Civil Secretariat Peshawar
 Phone:091-9210480, Fax#091-9211419

Dated Peshawar the May 29th,2019

Better Copy

NOTIFICATION

No/SO(S/F)E&SED/4-16/2019/Dr.Iffat Sultana/Principal/A/Abad: Consequent upon the approval of Competent Authority; the services of Dr. Iffat Sultana (BPS-19) Principal GCMHS No.1 Abbottabad are hereby placed at the disposal of Directorate of E&SE with immediate effect.

2- Consequent upon the above, District Education Officer (Female) Abbottabad is authorized to look after the school affairs till further orders.

SECRETARY
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Endst: of even No, & date:

Copy forwarder to the :

1. Accountant General Khyber Pakhtunkhwa, Peshawar
2. Director E&SE Khyber Pakhtunkhwa, Peshawar
3. District Education Officer (Female) Abbottabad.
4. District Accounts Officer Abbottabad
5. In-Charge EMIS, E&SE Department for uploading at official website
6. PS to Secretary E&SE Department
7. Principal Concerned
8. Office order file

(GUL RUKH)
 SECTION OFFICER (SSCHOOLS FEMALE)

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OFFICE OF THE PRINCIPAL GOVT: GIRLS CENTENNIAL MODEL SCHOOL NO 1 ABBOTTABAD

No: 94

Dated: 06/06/2019

TO

The Chief Secretary,
Khyber Pakhtunkhwa Peshawar.

SUBJECT: Appeal for cancelation of transfer order No. SO(S/F)E&SED/4-16/2019

Respected Sir,

With profound reverence it is stated that undersigned had seen a letter which was circulating on social media page namely (Voice of Hazara)(ANNEX A). Letter on the page was copy of letter from secretary Elementary & Secondary Education KPK. narrating that my services are assigned to director Elementary & Secondary Education KPK and authorizing Rehana Yasmin DEO(F) to look after the school affairs.

I am serving in E & SE Dept. in Grade 19 as principal GGCMSS No 1 Abbottabad. Recently, I have been transferred Pre-maturely without completion of my natural tenure at this station laid down in posting/transfer policy of KPK Govt. My performance remained excellent after assumption of charge of principal which can be testified from the annual BISE school result & co curricular activities

Matriculation result 2018:

The GGCMSSNO 1 school has outshined the other government schools in matric 2019 result. wherein 94 students of class 9th & 10th obtained A & A+ grade. It is worth mentioning that overall 95% students of matric qualified the exam with distinction. & for the first time GGCMSS NO 1 was nominated for the best school of district & was awarded with prize.

Equal Education for all:

GGCMSSNO1 granted 450 new admissions in 2019(ANNEX B) in past(year 2018)GGCMSSNO 1 also provided 300 new admissions to desirous students as well. GGCMSSNO 1 remained fully committed to provide equal education opportunities for all, in this regard school withstood top amongst all the other govt. schools in Abbottabad by providing 450 new admissions to desirous students & got positions in co-curricular activities as well.

Now through planned propaganda & conspiracies the progress of school is being deteriorated deliberately. The DEO ATD had a personal grudge with me as I pointed out some serious irregularities/anomalies & flatly refused to obey the illegal orders / demands which resulted my transfer. Hence I appeal to CM KPK, Chief Secretary KPK to take a notice & initiate an independent /Impartial high level inquiry committee to probe into the matter & set aside the order based on malafide intention

SECRETARY
KPK

I always tried to give due respect to my seniors & to obey all orders given to me by my officers & always put them on first priority also I have always kept service before self & always performed my duties fairly with devotion. But it is surprising for a person who is committed to perform her duties with great spirit & zeal to know about her transfer order through social media .

It is submitted that since I assumed my duties as principal ,I have been a constant victim of negative tactics of DEO & her allies they have endeavored to tarnish my good reputation through false accusations & tried to drag me in various inquires at different levels .I may highlight that with the grace of Allah I have battled through all these self fabricated false accusations :

As I found through social media few important issues:

- from the Day DEO (F) Rehana Yasmin took over the charge her attitude towards me was totally biased & very negative which was not understandable for me.
- Being her subordinate I always tried to obey her even when she took over charge I warmly welcomed her & also invited her on tea at my school.
- Undersigned has worked a lot for the welfare of students & staff as well at day & night to bring this institute on peak Which can be depicted from school progress. & It is through the hard work and struggle of undersigned that Since last two years GGCMSS NO 1 has maintained the progress in both curricular & co-curricular activities .school records were propely maintained under my jurisdiction. Undersigned has worked a lot for hostel(which was a major challenge being principal of said school) & tried to finish all kind of moral & financial corruption & budget was properly utilized for the welfare of students.
- In year 2014 the DEO (F) office had been shifted within the school premises as having rental problems. Since the year 2014 the said building has been occupied by Ex DEO & Principal . After that new DEO Faiza Shafi got shifted in same building but after her transfer from ATD dated feb,28 2019. She didn't vacate this residential facility when I requested to vacate the said building she replied that she already has informed to DEO that after june she will vacate but still DEO Rehana Yasmin created lot of issues for me regarding this residential facility . The facility had been granted purely on humanitarian basis and respect for higher office without any personal interest.
- The attached accommodation was not designed for higher authorities but was already being used by watchman of school which was renovaded later on for higher authorities for their personal use,& now The attached accommodation will be utilized for calss-4.
- Due to problem arise in Kareempura primary school,related to corporal punishment (ANNEX C) school environment was badly interrupted which already effected the teaching learning process & left repercussions on the students as well.
- After kareem pura primary school incidence ,during PTC meetings held on 19/04/2019 ,22/04/2019 , 25/04/2019 & 04/05/2019 PTC during which chairperson & PTC member's several times raised this issue to remove the temporary door between school yard (ANNEX D) & DEO Office .Which was

Presented
by
[Signature]


implanted by Ex- DEO female Samina altaf for her convenience as she was staying in the hostel with her family.

- Copies of forwarded applications by PTC members & chairperson are attached with application, in response their complaint undersigned ensured them that I will remove this door & so I did it, as this door was used by the office personnel's as well which also results disturbance in the school having 1400 female students. This door was also a threat in sense of security. Due to security threat PTC chairperson & members were constantly pressurizing for removal of door so first they informed DEO Hence accordingly the door was removed by the undersigned But I have regret to say that DEO female Rehana Yasmin, instead of providing security to the institute created mess in the school, then she tumbled the said wall. She created the panic to such an extent that student harassed. After collapsing the wall:
- Moreover DEO Rehana Yasmin strictly prohibited C-Leaves teaching staff & message was shared on WhatsApp group that do not allow C-Leaves (**ANNEX E**) to staff members otherwise strict action will be taken against concerned principal. As different schools principal's by obeying DEO when strictly prohibited staff for availing c-leave then teachers from different school along with staff members of no1 did protest against minimization of C-Leaves after school timing which was not in my knowledge & it was teacher's own decision (**ANNEX F**). But in meeting with principal DEO again & again targeted NO 1 school for protesting even it was not only no1 but all schools of district were present in protest.
- DEO is trying to bring her best friend Hinna Fatima in my school as principal due to her personal interest from school & hostel as from the day I took over charge they are trying to pressurize me for mutual with Hinna Fatima but I always refused. It is pertinent to highlight that undersigned already lodge a complain against aforesaid malpractices. Copy of same is again enclosed for perusal. I also take this opportunity to bring in light that a group being backed by Ex-DEO Mrs. Samina Altaf is putting all its efforts to create hurdles in smooth performance of my duties. However I am committed to perform my duties with same spirit & zeal.
- It is worth mentioning that Previously, many attempts were done to let me down & hurdles were created just to halt my efforts. I have been transferred through preplanned conspiracy & it is totally biased & partial act and not in the interest of department/institution. Such biased & partial decision is totally inappropriate & do not suits the decorum of this worthy post.

Your good self is requested for the cancellation of order which is totally biased & partial. Hence it is my humble request to cancel my order.

Your cooperation in this regard will be highly appreciated & honored. Copies of all applications & messages along with proofs are enclosed for perusal.

Sincerely,
Principal
Dr. Iffat Sultana
GGCMSS NO 1
Abbottabad.


(Dr. Iffat Sultana)
Principal (BPS-19)
GGCMSS No. 1 Atd.

Dr. Iffat Sultana

(27)

PSIC, S Khyber Pakhtunkhwa
Entry No. 6704/W/E o/c
Date 02-7-2019

OFFICE OF THE PRINCIPAL GOVT: GIRLS CENTENNIAL MODEL SCHOOL NO 1
ABBOTTABAD

No: 114

Dated 27/06/2019

TO

The Chief Secretary,

Khyber Pakhtunkhwa Peshawar.

SUBJECT: Request for communication of decision of appeal against order No,
SO(S/F)E&SED/4-16/2019/


Respected Sir,

In this connection it is stated that one month ago I rooted appeal to Chief Secretary KPK against notification no SO(S/F)E&SED/4-16/2019/ . I came to know through some reliable source that the quarter concerned has decided the issue but yet not conveyed to the undersigned, because of which the undersigned is pressing very hard.

Your kind honor is therefore heartedly requested that directive may please be issued for communication of decision of appeal.

I shall be highly grateful to you from the core of my heart.

Principal
Dr. Iffat Sultana
GGCMSS NO 1
Abbottabad


Principal (BPS-19)
GGCMSS No. 1 Atd.

Alleged


لکھنؤ فیضان سیکرٹری سکول: 3 ویں ایڈیٹ آباد

ڈائریکٹ سیکشن سکول (BPS 19) GASS NO I ایڈیٹ آباد

.....

- تاہم -

1. حکومت KPK ہزاریہ چیف سیکرٹری لٹا اور
2. حکومت KPK ہزاریہ سیکرٹری ایڈمنسٹریٹو اینڈ سیکرٹری ایجوکیشن لٹا اور

(3) ڈائریکٹر ایڈمنسٹریٹو اینڈ سیکرٹری ایجوکیشن لٹا اور

(4) ڈسٹرکٹ ایجوکیشن آفیسر زمانہ ایڈیٹ آباد

.....

(A) دعویٰ برائے صدور ڈرائیو لائسنس درج ذیل میں قرار دیا گیا ہے کہ فیضان سیکرٹری
آئیڈ ڈرائیو لائسنس 16/2019/54 - 4/SE D/SS (S/E) NO 50 مورخہ 29/5/19

سورہم غیر قانونی طور پر لائسنس اور Malafid ہے جسے قابل مستحق ہے۔
چونکہ محض عناد کی بنیاد پر صادر کیا گیا ہے۔ اور حوتی کو پھیلنے پر اثر
و کالعدم ہونے قابل عمل ہے۔ لہذا اس پر پابندی لگائی جائے گی تاکہ
زیر تعلیم طالبات جنکی تعداد (1400) ہے۔ طالبات کو اس قابل بنایا
کہ سکول کا رولٹ (150) رہا۔ لہذا حکم مذکورہ سر (ب) نا اعلیٰ ترقی
ہونے سے قابل مستحق ہے۔

ماہیت دعویٰ بغرض کورن فیضان و اختیار مانت
500/-

(B) دعویٰ برائے صدور ڈرائیو حکم اعلیٰ ترقی و نا اعلیٰ ترقی برصغیر ہندوستان کے و

Arrested

ایسے نام بنیاد اور جنی برید نہیں آدرز مہر عویہ پیر عہدہ آرمہ کرتے
اور مدعیہ کو غیر قانونی طور پر مدعیہ کو اپنی ڈیوٹی میں خلع ڈالنے
اور سکول فرکوار میں زیر قہم کالہات کی قہم میں رٹاوت بننے سے
علی اللہوم باز رہیں۔ اور اپنی غیر قانونی اور جنی برید نہیں آدرز
کو واپس لیں۔ اور عہدہ آرمہ نہ لیں۔

ماہیت دعویٰ بفرض کورن فیس و انصار
500/-

میں باقی - مابقی دعویٰ زیل ہے۔

یہ کہ مدعیہ کی طرف سے کوالتف کورنر سنٹیمنٹ ماڈل
سکینڈری سکول کے ایبل آباد ہے۔

2- یہ کہ سکول مذکور میں کالہات کا تعداد اس وقت (1400) ہے۔

3- یہ کہ مدعیہ نے اپنی تعیناتی کے بعد اس سکول میں ایک
دروازہ جو کہ غیر قانونی تھا۔ اور اس دروازہ سے مرد
وزن کا آزدانہ آمد رفت کا ذریعہ بنا کر رکھا۔ جو کہ
جنتیہ ایک زہ دار آئینہ ہونے سے مدعیہ نے کالہات کی
عزت اور حفاظت کے لیے بند کروا دیا۔ کیونکہ اس دروازہ
کی وجہ سے کالہات جو کہ نوجوان لکھری میں عیش کا مرکز
تھا شرم رکھا تھا۔ اور پھر اس دروازہ کی وجہ سے دران
کالہات بھی متضرر تھے۔ لہذا دروازہ کو بند کروا لیا۔

3- یہ کہ چونکہ یہ دروازہ مدعیہ نے سکول کے طرف سکول
رکھا تھا۔ جس سے مردوں کا آزدانہ آنا جاتا تھا۔ اس دروازہ
کو جب بند لیا گیا تو مدعیہ نے کو یہ بات مانگا اور گہری اور پھر
اس نے دروازہ بند کردہ دیوار کو تخریب جبراً تو شروع

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جس پر والدین کا جواب اور PTC کو سنل وقت پر اگر سنل
خانوں اقدام کو روکا جائے۔ اور اسی طرح دروازہ والی جگہ پر
یقیناً ریور تیزاً آدھی بج گئی۔

4- دروازہ منکود کو بند کرنے کے لئے اور سیکورٹی ٹھیکوٹ بنانے
کے لئے جانکے کے والدین اور پیچھے کونسل کے پر زور دیا جائے
پر بند کیا گیا اور اسکا اظہار پیشی کے بعد ہی ہو گیا۔

5- یہ کہ مدعی نے مدعیہ کے ایس اقدام کو وجہ سے مدعیہ سے مفاد
رہنہ شروع کر دیا۔ اور اسی طرح اسی مفاد کی بناء پر مدعیہ کو
تے مدعیہ کے لئے مدعیہ کے لئے مدعیہ کی ٹرانسفر ہڈیوں اور زمین پر مدعیہ
مدعیہ کے لئے مدعیہ کو دیا۔ حالانکہ مدعیہ اپنی ڈیوٹی ادا کرنے
اور اعلیٰ درجوں سے بچا رہی تھی اور محنت حاصل کر رہی تھی
تھی کہ جانکے کا زبردستی 100000 لے کر حکم دیا گیا اور
مفت اور مفاد قانون اور مفاد و مفاد اور مدعیہ کے مفاد
اور مفاد مدعیہ پر ہے اور مدعیہ کے مفاد حاصل ہوئے۔

6- یہ کہ مدعیہ نے مدعیہ کو کہ BP-19 میں اپنی ڈیوٹی سر انجام دی
رہی ہے۔ اور جس کو مدعیہ کی جگہ اضافی چارج دیا گیا۔ وہ
BP-18 میں کام کرتا ہے۔ نیز سپریم کورٹ کے فیصلہ کی رو سے
مدعیہ سرکار کے مفاد ہے۔ کیونکہ جیو اضافی چارج دیا گیا۔ وہ
میں مفاد لیکچر سے متعلق رہی ہے۔ اور یہ حکم سرکار کے مفاد
کے مفاد ہے۔ اور سپریم کورٹ کے فیصلہ کے مفاد ہے۔ لہذا حکم
مدعیہ سرکار کے مفاد اور مفاد قانون اور مفاد فیصلہ سپریم کورٹ کے مفاد
قابل مفاد ہے۔ جو کہ مفاد مدعیہ پر ہے اور مدعیہ کے مفاد حاصل ہوئے۔

Patented

Plaintiff through clerk of court present. Representative present on behalf of defendant. Plaintiff counsel filed application for adjournment reasons mentioned. Time granted. File to come up for arguments on behalf of plaintiff counsel on 28.6.2019

27/6/2019

مقدمہ
90/1
رہنہ
01/06/19
نیو لہ اپیشی
06/07/19

2137
1100

HAMANA REHMAN QURESHI
Civil Judge IV
ABBOTTABAD

Counsel for plaintiff present. Representative for defendants present.
Remaining arguments heard. File to come up for order on 6.7.2019.

(Hamna Rehman Qureshi)
Civil Judge IV, Abbottabad

Order # 08
06.07.2019

Parties through clerk of their respective counsel present.

Mr. Zubair Khan Jadoon for plaintiff

Admitted to be a True Copy Mr. Zahid Gul representative for defendant.

11 3 JUL 2019

This order is directed to dispose of an application for rejection of

EXAMINED District & Sessions Court, Abbottabad. plaint under Order 7 Rule 11 and 10 CPC filed on 20.06.2019.

Available record was gone through carefully.

Brief but essential facts of the suit are that the plaintiff filed the suit on 01.06.2019 seeking declaration, perpetual injunction that the

Handwritten signatures and marks at the bottom left.

4

Order No: SO(S/F)E&SED/4-16/2019 Dr. Iffat Sultana/ Principle/

Abad dated 29.05.2019 which is based on mala-fide, illegal and due to political revenge.

The plaintiff was serving as Principal of Government Girls Centennial Model Secondary School No.1 Abbottabad.

Defendant appeared and contested the suit by submission of application under Order 7 Rule 10 and 11 CPC on the ground that the court lacks jurisdiction to adjudicate upon the suit.

Admittedly, the plaintiff is a Government servant and scope of adjudication of civil servants before the civil court is ousted because the terms and conditions of the service, its posting and transfer is the exclusive jurisdiction of Government servant lies with service tribunal.

Without going into merits and demerits of the case the plaint in hand is returned under Order 7 Rule 10 CPC to seek her grievances from the proper forum. Ad-interim injunction already granted is hereby vacated.

No order as to cost.

File be consigned to Record Room after its necessary completion

compilation.

Announced
06.07.2019

(Hamna Rehman Oureshi)
Civil Judge IV,
Abbottabad

~~Abstract to be a Thin Copy~~

Abstract

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BBST HOSPITAL ABBOTTABAD.

Patient's Name: _____ S.No. C

FACE VALUE **RS. 10/-**



BENAZIR BHUTTO SHAHEED TEACHING HOSPITAL ABBOTTABAD

Out Patient Department

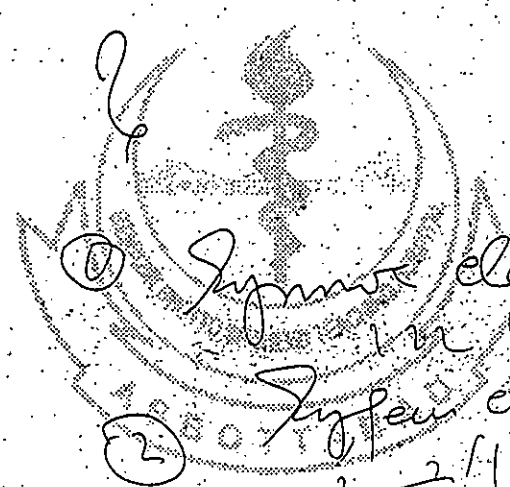
Patient's Name: _____ S.No. C

Yearly No: 80377 Dated: 2/18 2019

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5/11



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② Systeme eld n

3 - 2/1
Recommended sick
leave for ③ days



Attested

BBST HOSPITAL ABBOTTABAD

Patient's Name _____ S No _____



BENAZIR BHUTTO SHAHEED
TEACHING HOSPITAL ABBOTTABAD

Out Patient Department

Patient's Name _____ S No _____

Yearly No. 1233 Dated 6/8/2019

Back ails

Diagnosis 6/8/19

AD
mx of d. s / spine
RTW

Physiotherapy

Lower Back

as days

BBST HOSPITAL
MEDICAL OFFICE
Abbottabad

Winged
11/11/19

Feb 1st
 my 1st visit to son
 Sp. Calc. 100mg
 my 2nd visit
 Sp. R. 100mg
 my 3rd visit

Feb Calcare - D
 500 mg



rest for 10 days

MEDICAL OFFICE
 S.S. Teaching Hospital
 Approved

Attested



BBST HOSPITAL ABBOTTABAD.

Patient's Name: _____ S.No. C

FACE VALUE **RS. 10/-**



BENAZIR BHUTTO SHAHEED TEACHING HOSPITAL ABBOTTABAD

Out Patient Department

Patient's Name: iee S.No. 8/7

Yearly No: 63152 Dated: 8/7 2019.

Puo

102/2

By Oleedil ho

Pranay W

to Zentri ho

Almas
for
dr

To Agroci Pa

Dr. Ikramullah Khan
Chief Medical Officer
BBS Teaching Hospital
Abbottabad

Bozuberi

keherpe 7/21

Patent
[Signature]



Patient's Name: _____ S.No: _____

57

FACE VALUE RS: 10/-



BENAZIR BHUTTO SHAHEED
TEACHING HOSPITAL ABBOTTABAD

Out Patient Department

Patient's Name: _____ S.No: _____

Yearly No: 132/60 Dated: 13/5/2019

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Rt. Post. E.

Ampl. / m. e. e.

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Attested

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CP, ESR

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~~Basally dx~~

Uric acid


→ Doppler USG

Rt leg

→ Lab Louis 157
17077

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- His Dayer m
- Artrial wear

Attested




BBST HOSPITAL ABBOTTABAD.

Patient's Name: _____ S.No. C

FACE VALUE **RS. 10/-**



BENAZIR BHUTTO SHAHEED TEACHING HOSPITAL ABBOTTABAD

Out Patient Department

Patient's Name: _____ S.No. C

Yearly No: 84813 Dated: 29/8 2019.

P. 8/

Mr - 50000
Rajya of the
Copro of 12

Admission to Ceporxin 500
for 3 days to Ceporxin 500
to Rajya for

Dr. Ikramullah Khan
Chief Medical Officer
BBS Teaching Hospital
Abbottabad

Approved

7 - یہ کہ مدعی کا Tenure Free - ہو لینا اتم ہوگا

مدعی کے سوا کوئی شخص اور غیر قانونی پرینا نہ قابل سنی ہے ۔

8 - یہ کہ مدعی کے خلاف کوئی شکایت یا دیگر کوئی ایگریو وپروسیجر نہیں ہے ۔ اور نہ ہی اس باب میں کوئی حکم ہے ۔

9 - یہ کہ جگہ کا دعویٰ پر نہیں ہے بلکہ - لینا اتم ہوگا مدعی کے سوا کسی اور کے خلاف قانون اور عرق واقف پرینا نہ ہو سنی ہو مدعی پر جب ان کو اطلاع پرینا نہ قابل سنی ہے ۔ لینا اتم ہوگا مدعی کے سوا کسی اور کے خلاف قانون

10 - یہ کہ مدعی کا دعویٰ اسی کا ہے وہ اپنے دیگر قانون حکم سے مدعی پر عمل درآمد کرنے یا کوئی بھی کارروائی کرنے سے باز رہیں اور ایسا حکم دیا جائے کہ مدعوہ زمینوں میں کسی بھی طرح کے عوض و تصفیے کی اجازت انکار مدعی کے اندر ہو اور زمینداروں کے خلاف عدالت کے فیصلوں کو اختیار سماعت عدالت کو دیا جائے ۔

11 - جائیدد دعوہ پر حق کوئی فیصلہ اختیار کرنے میں عدالت کو اختیار ہے ۔

اس کے علاوہ دعوہ مدعیوں کے لیے عدالت کے فیصلوں کے مطابق مدعیوں پر عمل درآمد کرنے میں عدالت کو اختیار ہے ۔

1/6/19

صالحہ سعید سلطانہ مدعیہ بذریعہ وکیل

[Handwritten Signature]

لکھنؤ



لکھنؤ ایڈوائزر ایف۔ اے۔ ایم۔ جے۔ ایم۔
پرائیویٹ اور ڈیونٹو پرائیویٹ لٹڈ۔
دہلی

صالحہ سعید سلطانہ مدعیہ

بیمہ وکیلین

بیمہ وکیلین عدالت دھواں جین درجنٹ لکھنؤ

صالحہ سعید سلطانہ مدعیہ

[Handwritten Signature]
Attested

IN THE COURT OF HAMNA REHMAN OURESHI, CIVIL JUDGE-IV, ABBOTTABAD.

Dr. Hat Sultana vs Govt.

FORM "A"

Serial No. of Order of Proceedings	Date of Order or Proceedings	Order or other proceedings with Signatures of Judge or Magistrate and that of parties or council where necessary.
1	2	3
Or-----03	01.06.2019	<p>Fresh plaint received. Plaintiff through counsel Mr. Muhammad Zubair Khan Jadoon Advocate present. Admits and verifies the contents of the plaint to be true and correct. It be registered.</p> <p>An application for the grant of temporary injunction is also annexed with the plaint. Preliminary arguments heard on application and record perused. In the light of short arguments and available record on file, status quo be maintained for 7 days. Subject to notice to the defendant and any contrary order of any superior/appellate forum. Meanwhile, proceedings of case management and scheduling conference are initiated. Relevant proforma under the provisions of CPC rules be prepared for the date fixed. Summons for settlement of issues be issued to the defendant for <u>20-6-2019</u>.</p> <p><u>Announced</u> 01.06.2019</p> <p style="text-align: right;">(Hamna Rehman Oureshi) Civil Judge-IV, Abbottabad</p> <p>No. <u>8617</u> Date <u>12/06/19</u> District & Sessions Judge District Abbottabad Date of Preparation of Copy <u>12-6-19</u> Date of Delivery of Copy <u>12-6-19</u></p>

Attested to be a True Copy

12 JUN 2019

EXAMINER
District & Sessions Judge
Abbottabad

Attested
[Signature]

43

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE)
ABBOTTABAD

K

Better Copy

OFFICE ORDER.

In compliance with Govt: of Khyber Pakhtunkhwa Peshawar Notification Issued under Endstt: No.SO(S/F)E & SED/4-16/2019/Dr. Iffat Sultan/Principal/A/A/Abad. Dated Peshawar the 29-05-2019 Mst. Shahida Mustafa SST is directed to take over the charge as Incharge of GGCMSS (No.1) Abbottabad till further order. In the best interest of public service.

DISTRICT EDUCATION OFFICER
(FEMALE) ABBOTTABAD

Endst:No.4977-82 /EB.I/P.F. No.1 Atd.

Dated 3/6/2019

Copy to the:-

1. Director E& SE Khyber Pakhtoonkhwa, Peshawar
2. Section Officer(Schools Female) Govt: of Khyber Pakhtunkhwa Peshawar
3. Principal,GGCMSS (No.1) Abbottabad
4. Mst: Shahida Mustafa, SST GGCMSS (No.1) Abbottabad.
5. PA to Deputy Comissioner Abbottabad

DISTRICT EDUCATION OFFICER
(FEMALE) ABBOTTABAD

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DE: 27/2/2015

84 DE [Establishment Code Khyber Pakhtunkhwa]

Posting and Transfer

Statutory Provision.

Section 10 of the NWFP Civil Servants Act, 1973.

Posting and Transfer. Every civil servant shall be liable to serve anywhere within or outside the Province, in any post under the Federal Government, or any Provincial Government or Local authority, or a Corporation or body set up or established by any such Government:-

Provided that nothing contained in this section shall apply to a civil servant recruited specifically to serve in a particular area or region;

Provided further that, where a civil servant is required to serve in a post outside a service or cadre, his terms and conditions of service as to his pay shall not be less favourable than those to which he would have been entitled if he had not been so required to serve.

POSTING / TRANSFER POLICY OF THE PROVINCIAL GOVERNMENT

- i) All the posting/transfers shall be strictly in public interest and shall not be abused/misused to victimize the Government servants
- ii) All Government servants are prohibited to exert political, Administrative or any other pressures upon the posting/transfer authorities for seeking posting/transfers of their choice and against the public interest.
- iii) All contract Government employees appointed against specific posts, can not be posted against any other post.
- iv) The normal tenure of posting shall be three years subject to the condition that for the officers/officials posted in unattractive areas the tenure shall be two years and for the hard areas the tenure shall be one year. The unattractive and hard areas will be notified by the Government.
- v) { }
- vi) While making postings/transfer from settled areas to FATA and vice-versa, specific approval of Governor, NWFP needs to be obtained

While making postings/transfers of officers/officials up to BS-17, from settled areas to FATA and vice-versa approval of the Chief Secretary NWFP

1 Para-1(v) regarding months of March and July for posting/transfer and authorities for relaxation of ban deleted vide letter No: SCR-VI (ERAD) 1-4/2008/Vol-VI, dated 3-6-2008. Consequently authorities competent under the NWFP Government Rules of Business, 1985, District Government Rules of Business 2001, Posting/Transfer Policy and other rules for the time being in force, allowed to make posting/transfer subject to observance of the policy and rules.

Noted
[Signature]

45

Establishment Code Khyber Pakhtunkhwa

Posting and Transfer

Bele Copy

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-
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Patrol
[Signature]

**Before The Khyber Pakhtunkhwa Service Tribunal,
Peshawar**

CM No _____/2019

In

SA No _____/2019

Dr. Iffat Sultana, Principal (BPS-19) GGCH SS No.1 Abbottabad

Appellant

V/s

Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education and three (03) others**Respondents**


Application for suspension of the operation of impugned Notification No. SO (S/F) E & SED/4-46/2019 dated 29/05/2019 whereby the petitioner/appellant's services were placed at the disposal of respondent No.3 as OSD while Respondent No.4 was directed to look after the affairs of the school who deputed a Junior Teacher of BPS-16 (SST) as Incharge of GGCM SS No.1 Abbottabad

Respectfully Sheweth:

The petitioner/appellant submits as under:-

- 1- That Respondent No.1 vide impugned Notification dated 29/05/2019(annexure-"E") placed the services of appellant at the disposal of Respondent No.3 while directed Respondent No.4 to look after the affairs of the School who deputed junior teacher of BPS-16(SST) as incharge of the School in disregard and violation of the law laid by Honorable Supreme Court of Pakistan in a Judgment reported as 2013 SCMR 1, and PLD 2013 SC 195, therefore the appellant/petitioner has prima facie strong case in her favor.
- 2- That the post of Principal (BPS-19) is still vacant while the appellant/petitioner has not relinquished the charge of the said post as yet, therefore balance of convenience lies in appellant/petitioner's favor.

Approved



3- That the appellant/petitioner shall suffer an irreparable loss if the operation of impugned Notification (annexure-"E") is not suspended.

It is therefore prayed that this Honorable Tribunal may graciously be pleased to suspend the operation of impugned Notification dated 29/05/2019 till disposal of accompanying appeal in the interest of Justice.

Appellant/Petitioner

Through:-

NASIR SALEEM
(Nasir Saleem)
Advocate
236- Iqbal Shopping Complex
The Mall, Abbottbad
No: +92334-1054951

Irshad
(Sardar Muhammad Irshad)
Advocate High Court
236- Iqbal Shopping Complex
The Mall, Abbottbad
No:+92343-3326000

Attested
[Signature]

4760

Before The Khyber Pakhtunkhwa Service Tribunal,
Peshawar

CM No _____/2019
in
SA No _____/2019

Dr. Iffat Sultana, Principal (BPS-19) GGCH SS No.1 Abbottabad

Appellant

V/s

Government of Khyber Pakhtunkhwa through Secretary Elementary and
Secondary Education and three (03) others Respondents

AFFIDAVIT

I, Dr. Iffat Sultana, the petitioner/appellant do hereby solemnly
affirm and declare that the contents of the accompanying petition are true
and correct to the best of my knowledge and belief and nothing has been
concealed from this Honorable Tribunal.



VERIFICATION

Verified on Oath at Abbottabad on 2nd day of Sep 2019 that the contents
above affidavit are true and correct to the best of my knowledge and belief

Deponent

Deponent

Parent

Before The Khyber Pakhtunkhwa Service Tribunal, Peshawar

CM NO. _____ of 2019

SA No. _____ of 2019

Dr. Iffat Sultana, Principal BPS-19 GGCH SS No.1 Abbottabad.

Appellant/Petitioner

V/s

Govt of KPK and 03 others

Respondents

Urgent application for early hearing of stay application in main appeal.

Respectfully Sheweth:

The petitioner/appellant begs to submit as under :-

1. That above appeal along with an application for suspension of the operation of impugned Notification, dated 29/05/2019 is being filed today where in early hearing of the stay application for doing complete justice between the parties is necessary.
2. That the application is bonafide and for protecting valueable legal rights of the petitioner/appllant.

It is, therefore, prayed that this application may graciously be accepted and stay application be heard at Peshawar as early as possible. The date convenient to the counsel for petitioner/appellant is 05/09/2019.

Appellant/Petitioner

Through:

NASIR SALEEM

(Nasir Saleem)

Advocate

236- Iqbal Shopping Complex

The Mall, Abbottbad

No: +92334-1054951

Irshad

(Sardar Muhammad Irshad)

Advocate High Court

236- Iqbal Shopping Complex

The Mall, Abbottbad

No: +92343-3326000

Before The Khyber Pakhtunkhwa Service Tribunal, Peshawar

CM NO. _____ of 2019

SA No. _____ of 2019

Dr. Iffat Sultana, Principal BPS-19 GGCH SS No.1 Abbottabad.

Appellant/Petitioner

V/s


Govt of KPK and 03 others

Respondents

Urgent application for early hearing of stay application in main appeal.


AFFIDAVIT

I, Dr. Iffat Sultana , appellant/petitioner do hereby solemnly affirm and declare that the contents of the accompanying application are true and correct to the best of my knowledge and belief and nothing has been concealed from thios Hon'blr Tribunal


Deponent

VERIFICATION

Verified on Oath at Abbottabad on ____ day of _____, 2019 that the contents of above affidavit are true and correct to the best of my knowledge and belief.


Deponent



27/8/19

Attested



VAKALATNAMA

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

VERSUS

I/We.....hereby appoint M/S. SARDAR MUHAMMAD IRSHAD, NASIR SALEEM and KAINAT BIBI, Advocates in the above mentioned case, to do all or any of the following acts, deeds and things:-

1. To appear, act and plead for me/us in the above mentioned case in this Court/Tribunal in which the same may be tried or heard and any other proceedings arising out of or connected herewith.
2. To sign, verify and file appeals, petitions, suits, affidavits and applications for compromise or withdrawal or for referring to arbitration of the said case as may be deemed necessary or advisable by clients for the conduct, prosecution or defense of the said case at all its stages.

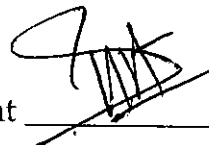
AND hereby agree:-

-
- a. That the advocates shall be entitled to withdraw from the prosecution of the said case if the whole or any part of the agreed fee remained unpaid.


In witness whereof I / We have signed this Vakalatnama hereunder, the contents of which have been read / explained to me / us and fully understood by me / us.

Accepted by:-

Signature of Executant



SARDAR MUHAMMAD IRSHAD
ADVOCATE HIGH COURT
+92343-3326000


NASIR SALEEM
ADVOCATE
+92334-1054951

KAINAT BIBI
ADVOCATE

Attested
