

Appeal No. 596/2015
Nadxa Parveen vs Edu Deptt.

22.03.2016

Counsel for the appellant, Addl: A.G for official respondents No. 1 and 2 and counsel for private respondent No. 3 present. Photo copy of office order dated 13.2.2016 submitted by the learned Addl: AG according to which the appellant has been adjusted at GGPS Qaid Abad No. 1 (Kakshal) Peshawar.

In the light of afore-stated development, learned counsel for the appellant requested for withdrawal of appeal.

Dismissed as withdrawn. File be consigned to the record room.



Chairman

ANNOUNCED
22.3.2016

22.03.16.

03.12.2015

Counsel for the appellant, Mr. Ziaullah, GP for official respondents No. 1 and 2 and counsel for private respondent No. 3 present. Since Mr. Abdul Latif Khan one of the Members of the Division Bench is not in a position to hear the present appeal and due to non-availability of another Member another D.B is not constituted as such the appeal is adjourned for hearing before another D.B to 8.1.2016. Status-quo be maintained.


Chairman

08.01.2016

Counsel for the appellant, M/S Khurshid Khan, SO and Hameed-ur-Rehman, AD (lit.) alongwith Ziaullah, GP for official respondents and counsel for private respondent No. 3 present. Since Mr. Abdul Latif Khan one of the Members of Division Bench is not in a position to hear the present case and another D.B is not available as such adjourned to 24.2.2016 for final hearing before a D.B in which Mr. Abdul Latif Khan is not sitting. Status-quo be maintained.


Chairman

24.02.2016

Counsel for the appellant, M/S Khurshid Khan, SO and Javed Ahmed, Supdt. alongwith Addl: A.G for official respondents and counsel for private respondent No. 3 present. To come up for same on 22.3.2016.


Reader

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR.
OFFICE ORDER.

Mst: Nadra Parveen PSHT (BPS-15) Govt: Girls Primary School Old Karimpura Peshawar is hereby adjusted at Govt: Girls Primary School Qaid Abad No.1(Kakshal) Peshawar vice Mst: Shahnaz Akhtar PSHT (B-15) is going to be retired with effect from 04/04/2016 in the intrest of public service.

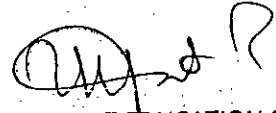
Note:- Charge report should be submitted to all concerned.

(ULFAT BEGUM)
DISTRICT EDUCATION OFFICER,
(FEMALE) PESHAWAR.

Endst: No. 7850-53 dated Peshr; the 13/2 /2016.

Copy for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. ASDEO (F) Circle Concerned.
3. ✓ Head Teacher concerned.
4. Official concerned.


DISTRICT EDUCATION OFFICER,
(FEMALE) PESHAWAR.

14.10.2015

Counsel for the appellant, Mr. Ziaullah, GP for official respondents and counsel for private respondent No. 3 present. Arguments could not be heard due to shortage of time. To come up for arguments on 5-11-15.


Member


Member

05.11.2015

Mr. Rizwanullah Advocate, learned counsel for the appellant, Mr. Muhammad Jan, GP for official respondents No. 1 & 2 and counsel for private respondent No. 3 present. Adjournment was requested by the parties. In view of some reservation of the learned Member (Executive) about disposal of this appeal by this Bench, this appeal may be submitted to the worthy Chairman for appropriate order. Appeal be put before the worthy Chairman immediately. In the meanwhile status-quo be maintained.


MEMBER

13.11.2015

None present for appellant. In view of the reservation of one of the learned Member this appeal will be heard by Division Bench wherein Mr. Abdul Latif Khan is not sitting. As such the appeal is assigned to D.B for 3.12.2015. Status-quo be maintained. Notice be issued to the parties for the date fixed.


Chairman

10.08.2015

Counsel for the appellant, M/S Javed Ahmed, Supdt. and Hafizullah, Assistant alongwith Assistant A.G for official respondents No. 1 and 2 and counsel for private respondent No. 3 present. Respondents No. 1 and 2 not in attendance as they are reportedly busy at Workshop arranged at Islamabad. The said respondents shall appear in person in the light of observations recorded by this Tribunal on 9.7.2015. To come up for further proceedings on 27.8.2015. Till then the restraint order shall continue.


Chairman

27.08.2015

Counsel for the appellant, respondents No. 1 and 2 in person alongwith Addl: A.G and counsel for private respondent No. 3 present. Learned counsel for the parties were heard at length. Since the appeal has been admitted to regular hearing and restraint order has been passed by this Tribunal in favour of the appellant as such it is deemed appropriate to afford an opportunity to the respondents including officials respondents as well as private respondent who shall submit their stance in writing on 21.9.2015 before S.B. Status-quo be maintained.


Chairman

21.09.2015

Counsel for the appellant, Mr. Raham Taj, ADO alongwith Assistant AG for official respondents No. 1 and 2 and counsel for private respondent No. 3 present. Written reply by official respondents as well as private respondent submitted. The appeal is assigned to D.B for rejoinder and final hearing for 14.10.2015. Status-quo be maintained.


Chairman

26.06.2015

Husband of the appellant, Asstt. A.G for the official respondents and Mr. Muhammad Asif Yousafzai, Advocate for private respondent No. 3 present and Wakalatnama placed on file. It was submitted that due to general strike of the bar, counsel for the appellant is not available. Therefore, case is adjourned to 09.07.2015 for further preliminary hearing. In the meanwhile the operation of impugned order shall remain suspended till the next date.


Member

09.07.2015

Counsel for the appellant and Addl. A.G for official respondents No. 1 and 2 and counsel for private respondent No. 3 present. Arguments of the learned counsel for the parties heard at length and available record also perused with their assistance, the Tribunal is of the view that learned counsel for the appellant in his arguments of today coupled with his previous arguments on 5.6.2015 has worked out a strong case to led the Tribunal to state that the appeal is entitled to be admitted for regular hearing. Hence admitted, subject to all legal exceptions. The appellant is directed to deposit the security and process fee within 10 days. It was agreed that respondents No. 1 and 2 may be personally summoned alongwith relevant record to show the reasons as to whether previous judgment of this Tribunal dated 12.5.2015 and requirements of the very Rationalization Policy and Regulatory Act particularly have been complied with while passing impugned order or otherwise. To come up for further proceedings on 10.8.2015. In the meanwhile, the impugned order shall remain suspended till next date.


Member

Appellant Deposited
Security & Process Fee



05.06.2015

Counsel for the appellant (Mr. Rizwanullah, Advocate) present. Learned counsel for the appellant submitted that in flagrant violation of law, rules and transfer policy of the Government, appellant who is a PSHT in GGPS, old Karimpura, Peshawar City and whose Union Counsel is 19 Gunj, has been transferred to Union Counsel No. 73 Gul Baila. It was further submitted that appellant is senior in the list being at serial No. 319 where-as the private respondent No. 3 is at serial No. 496 and this legal and policy dimension was also ignored in the impugned order. It was further submitted that the impugned order is neither based on law nor based on rationale reasons and the same is incongruous to section 24-A of General Clauses Act. Reliance was placed on 2011 SCMR page-1. Learned counsel for the appellant further submitted that the appeal is competent under Section 4 of the KPK Service Tribunal Act, 1974 and further that the impugned order may be suspended for which purpose a separate application is appended with the appeal and in case the impugned order is not suspended, the very purpose of appeal will be defeated and the appeal will become infurctuous.

During the course of preliminary hearing, however, it came to know that a previous appeal of the appellant was disposed of by this Tribunal and this would require further consideration and arguments as to whether the previous order of this Tribunal was ignored or not acted upon in letter and spirit for which reason it would be proper to give pre-admission notice to the respondents, as well as learned Addl: A.G. Since the learned counsel has worked out that the matter is urgent, therefore operation of the impugned order is suspended till the date fixed. Notice be issued to the respondents. To come up for further preliminary hearing on 26.6.2015.





Member.

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 596/2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	03.06.2015	<p>The appeal of Mst. Nadra Perveen presented today by Mr. Rizwanullah Advocate, may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>Bench II</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

BEFORE THE CHAIRMAN, KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

In the matter Service Appeal No. 596 /2015

1. Mst. Nadra Perveen,(PSHT),GGPS, Old Karimpura, Peshawar City.

APPELLANT

VERSUS

1. Director (Elementary & Secondary) Education, Dabgari Garden, Peshawar and others.

RESPONDENTS

I N D E X

S.No	Particulars	Annexure	Pages #
1	Service Appeal	—	1-6
2	Affidavit	—	7
3	Copy of Policy dated 1-4-2014	“A”	8-9
4	Copy of posting order 9-4-2014	“B”	10-11
5	Copy of transfer order dated 11-4-2014	“C”	12-13
6	Copy of transfer order dated 12-4-2014	“D”	14
7	Copy of service appeal	“E”	15-19
8	Copy of judgment of this Tribunal	“F”	20-23
9	Copy of letter dated 18-5-2015	“G”	24
10	Copy of letter dated 27-5-2015	“H”	25
11	Copy of Notification dated 28-5-2015	“I”	26
12	Copy of impugned order dated 28-5-2015	“J”	27
13	Copy of final seniority list	“K”	28-30

14	Application for stay order	-	31-33
10	Wakalatnama	-	-

Nadba Pablen

Appellant

Through

Rizwanullah

Rizwanullah

M.A. LL.B

Advocate High Court, Peshawar

**BEFORE THE HON'BLE CHAIRMAN, KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR**

Service Appeal No. 596 /2015

Mst. Nadra Perveen,
(PSHT), GGPS, Old Karimpura, Peshawar City.

K.W.P. Province
Service Tribunal
Diary No 635
Dated 03-6-2015

APPELLANT

VERSUS

1. Director (Elementary & Secondary) Education, Dabgari Garden, Peshawar.
2. District Education Officer (Female), Hashtnagri, Peshawar City.
3. Mst. Iram Ambreen,
PHST, GGPS, Jala Bela, District Peshawar.

RESPONDENTS

**APPEAL UNDER SECTION 4 OF THE
KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL ACT, 1974 AGAINST THE
IMPUGNED ORDER NO. 8682-87 DATED
28-5-2015 WHEREBY THE APPELLANT WAS
ILLEGALLY TRANSFERRED FROM GGPS
OLD KARIMPURA PESHAWAR TO GGPS GUL
BELA KOCHIAN PESHAWAR.**

Prayer in Appeal

By accepting this appeal, the impugned order No.8682-87 dated 28-5-2015 may graciously be set aside and the appellant may kindly be retained at GGPS, Old Karimpura Peshawar under the policy of rationalization circulated by the Government of Khyber Pakhtunkhwa vide No. 6104-59 dated 1-4-2014.

Filed to the
Registrar
03/06/2015

Any other relief deemed appropriate in the circumstances of the case, not specifically asked for, may also be granted to the appellant.

Respectfully Sheweth,

Short facts giving rise to the present appeal are as under:-

1. That the appellant was serving as Primary School Head Teacher in Government Girls Primary School, Gor Ghatri No.1, Peshawar at the relevant time. According to the policy of rationalization, the above school was merged into GGPS, Old Karimpura Peshawar and the appellant being senior in rank under the final seniority list was made Head Mistress in the said school vide order No.6782-96 dated 5-4-2014.

(Copies of policy and posting order is appended as Annex-A & B).

2. That as respondent No.3 was junior in rank than the appellant, therefore, she was transferred to Government Girls Primary School Jala Bela, Peshawar vide order No.7010-7110 dated 11-4-2014. But it is curious to note that after one day of the said order, she prevailed over the Competent Authority through political interference and got her posting in place of appellant in utter violation of the above policy as well as law laid down by the august Supreme Court of Pakistan in various judgments.

(Copies of transfer orders are appended as Annex-C & D).

3. That the appellant after exhausting departmental remedy, invoked the jurisdiction of this Hon'ble Tribunal by way of filing a service appeal No. 539/2014 alongwith an application for suspending the operation of the impugned order and status quo was granted accordingly.

(Copy of service appeal is appended as Annex-E).

4. That when the above appeal came up for final hearing before this Hon'ble Tribunal on 12-5-2015, the same was converted into

departmental appeal and Appellate Authority was directed to decide the said appeal in accordance with law within one month.

(Copy of Judgment is appended as Annex-F).

5. That when the Appellate Authority (respondent No.1) received the order of this Hon'ble Tribunal, he directed the District Education Officer (Female) Peshawar (respondent No.2) **“ to check the seniority of both the PHST and decide the case on seniority and merits basis under intimation to all concerned”** vide letter No.2502 dated 18-5-2015.

(Copy of letter is appended as Annex-G).

6. That the respondent No.2 was legally bound to confirm the seniority position of both the PHST alongwith their Union Councils and then to submit a comprehensive report to the Appellate Authority so as to decide the departmental appeal. But the respondent No.2 failed to do so and straightaway forward a proposal for posting and transfer of the above PHST without giving any justification vide letter No.8619 dated 27-5-2015.

(Copy of letter is appended as Annex-H).

7. That the Appellate Authority (respondent No.1) while disposing of the departmental appeal, approved the so-called proposal without giving any reasons as required under Section 24 of General Clause Act,1897 as well as law laid down by august Supreme Court of Pakistan in various judgments.

(Copy of notification No. 4910-16 dated 28-5 2015 is appended as Annex-I).

8. That as result of above approval, the appellant was illegally transferred to GGPS Gul Bela, Kochian Peshawar, outside her Union Council i.e (from UC-19 Gunj to UC-73 Gul Bela) vide order NO.8682-87 dated 28-5-2015.

(Copy of order is appended as Annex-J).

9. That the appellant felt aggrieved by the aforesaid order, now files this appeal before this Hon'ble Tribunal inter-alia on the following grounds within the statutory period of law.

GROUND OF APPEAL

- A. That the Appellate Authority (respondent No.1) was under statutory obligation to consider the case of appellant in its true perspective and in accordance with the policy of rationalization as well as **Khyber Pakhtunkhwa (Appointment, Deputation, Posting and Transfer of Teachers, Lecturer, Instructors and Doctors) regulatory Act, 2011**. But he failed to do so. Therefore, the impugned order is against the spirit of administration of justice.
- B. That it is evident from the record that when the respondent No.1 received the order of this Hon'ble Tribunal, he directed the District Education Officer (Female) Peshawar (respondent No.2) **“to check the seniority of both the PHST and decide the case on seniority and merits basis under intimation to all concerned”** vide letter No.2502 dated 18-5-2015. This respondent was not competent to decide the disputed issues under the departmental appeal but was required only to confirm the seniority position of both the PHST alongwith their Union Councils so as to secure the ends of justice and then to submit a comprehensive report in this respect to the respondent No.1 to enable him to decide the departmental appeal in accordance with law. But she failed to do so and decided the disputed issues illegally and thereafter submitted a proposal for transfer of the said PHST without supporting any justification. In the so-called proposal, the respondent No.3 was proposed to be retained in GGPS, Old Karimpura Peshawar while the appellant would be transferred to GGPS Gul Bela Kochian, outside her Union Council. This proposal was not based on sound reasons and correct appreciation of law but was based on the whims, conjectures and surmises of respondent No.2 for the reasons that the appellant was rank senior than the ^{respondent} appellant No.3 as she was placed at serial No. 319 in the final seniority list whereas the respondent No.3 was shown at serial No. 496. Thus, by no stretch of imagination, the respondent No.3 was rank senior than the appellant. Therefore, she was not entitled to be retained in GGPS, Old Karimpura Peshawar in place of appellant under the Policy of rationalization. But the Appellate Authority while approving the so-called proposal and

passing the impugned order, has overlooked this important aspect of the case and as such a grave injustice has been caused to the appellant on this count. Thus, the impugned order is liable to be set aside.

(Copy of final seniority list is appended as Annex-K)

- C. That the Appellate Authority (respondent No.1) was legally bound to decide the departmental appeal with cogent reasons by virtue of Section 24 of the General Clauses Act, 1897 as well as law laid down by august Supreme Court of Pakistan in case reported in **2011-SCMR-1**. The relevant citation of the judgment is reproduced herein for facility of reference:-

(b) General Clauses Act (X of 1897)---

**----S. 24-A ---Speaking order- Public
functionaries are bound to
decide cases of their subordinates after
application of mind with cogent reasons within
reasonable time.**

It is well settled law that decision of the August Supreme Court of Pakistan is binding on each and every organ of the State by virtue of Article 189 and 190 of the Constitution of Islamic Republic of Pakistan, 1973. Reliance can be placed on the judgment reported in **1996-SCMR-Page-284 (Citation-C)**. The relevant citation is as under:-

(c) Constitution of Pakistan (1973)

**Arts. 189 & 190--- Decision of Supreme Court—
Binding, effect of---- Extent—Law declared by
Supreme Court would bind all Courts,
Tribunals and bureaucratic set-up in Pakistan.**

But the Appellate Authority has blatantly violated the above dictum by not giving any reasons while disposing of the departmental appeal. Hence, the impugned order is liable to be reversed on this count alone.

- D. That the appellant has not been treated in accordance with law, rules and policy on the subject and acted in violation of **Article 4 of the Constitution of Islamic Republic of Pakistan, 1973**. Therefore, impugned order is not sustainable in the eye of law.

- E. That the impugned order was passed in order to accommodate his blue eyed chap. Therefore, the same is not tenable under the law.
- F. That the impugned order of respondent No.1 is suffering from legal infirmities and as such has caused great miscarriage of justice. Thus, the impugned order is bad in law.
- G. That the impugned order in question is the result of misreading and non-reading of relevant documents/ law. Hence, the same liable to be set aside.
- H. That the order of respondent No. 1 is against law, facts of the case and norms of natural justice. Therefore, the same is untenable in the eyes of law.
- I. That the aforesaid order is based on surmises and conjectures. Hence, the same is not sustainable under the law.
- J. That the appellant would like to seek the permission of this Hon'ble Tribunal to advance some more grounds at the time of arguments.

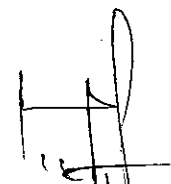
In view of the above narrated facts and grounds, It is, therefore, humbly prayed that the impugned No. 8682-87- dated 28-5-2015 may graciously be set aside by retaining the appellant at GGPS, Old Karimpura Peshawar under the "Policy of Rationalization" circulated by the Government of Khyber Pakhtunkhwa vide No. 6104-59 dated 1-4-2014.

Any other relief deemed proper and just in the circumstances of the case, may also be granted.



Appellant

Through



Rizwanullah

M.A. LL.B

Advocate High Court, Peshawar

Dated: 3-6-2015

**BEFORE THE HON'BLE CHAIRMAN, KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR**

Service Appeal No. _____/2015

Mst. Nadra Perveen,
(PSHT), GGPS, Old Karimpura, Peshawar City.

APPELLANT

VERSUS

1. Director (Elementary & Secondary) Education, Dabgari Garden, Peshawar.
2. District Education Officer (Female), Hashtnagri, Peshawar City.
3. Mst. Iram Ambreen,
PHST, GGPS, Jala Bela, District Peshawar.

RESPONDENTS

AFFIDAVIT

I, Mst. Nadra Perveen, (PSHT), GGPS, Old Karimpura, Peshawar City, do hereby solemnly affirm and declare that the contents of the accompanied service appeal are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Tribunal.



Nadra Perveen
Deponent

**Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar**

PH No. 091-9201389, 9210938,
9210437, 9210957, 9210468
Fax 091-9210936, 0800-33857
No. 104-57/Kationization/psub
dated Peshawar the 01/04/2013.

All the District Education Officers,
(Male & Female), in Khyber Pakhtunkhwa.

Subject:- Guidelines for Posting of Teachers as a result of rationalization.

Attention:

I am directed to refer to the subject noted above and to clarify that posts of PST B-12 /Senior PST B-14/PST B-15 may be rationalized and re-distributed among the Primary schools in the following manner and PST B-12, Senior PST B-14 and PST B-15 may be posted as under:-

Distribution of Posts in Primary Schools

Rationalization of Posts @ 1-40 ratio in Primary Schools (Female)

S.No	School Code	Name of Primary School	Total Employment					Sanctioned Posts after Rationalization		
			SST-B-10	CE-B-11	PST-B-12	SST-B-14	PST-B-15	SST-B-12	PST-B-15	Total
1	25281	GHARIALA	1	0	0	0	0	1	0	1
2	25281	GHARIALA	1	0	0	0	0	1	0	1
3	25281	GHARIALA	1	0	0	0	0	1	0	1
4	30050	GHARIALA	1	0	0	0	0	1	0	1
5	25281	GHARIALA	0	0	0	0	0	0	0	0
6	25281	GHARIALA	0	0	0	0	0	0	0	0
7	25277	GHARIALA	0	0	0	0	0	0	0	0
8	25281	GHARIALA	0	0	0	0	0	0	0	0
9	32912	GHARIALA	0	0	0	0	0	0	0	0
10	25097	GHARIALA	0	0	0	0	0	0	0	0
11	25138	GHARIALA	0	0	0	0	0	0	0	0
12	32606	GHARIALA	0	0	0	0	0	0	0	0
13	25278	GHARIALA	0	0	0	0	0	0	0	0
14	421-460	GHARIALA	0	0	0	0	0	0	0	0

Rationalization of Posts @ 1-40 ratio in Primary Schools (Male)

S.No	School Code	Name of Primary School	Total Employment					Sanctioned Posts after Rationalization		
			SST-B-10	CE-B-11	PST-B-12	SST-B-14	PST-B-15	SST-B-12	PST-B-15	Total
1	30050	GHARIALA	1	0	0	0	0	1	0	1
2	25281	GHARIALA	1	0	0	0	0	1	0	1
3	25244	GHARIALA	1	0	0	0	0	1	0	1
4	25277	GHARIALA	1	0	0	0	0	1	0	1
5	25281	GHARIALA	1	0	0	0	0	1	0	1
6	32912	GHARIALA	1	0	0	0	0	1	0	1
7	25097	GHARIALA	1	0	0	0	0	1	0	1
8	25138	GHARIALA	1	0	0	0	0	1	0	1
9	32606	GHARIALA	1	0	0	0	0	1	0	1
10	25278	GHARIALA	1	0	0	0	0	1	0	1
11	421-460	GHARIALA	1	0	0	0	0	1	0	1

Note:- Each Primary School (except JICA & Community Model School where SST post is sanctioned) will have one post of PST B-15 and one post PST B-12. There will be no post of PST B-15 & SST B-14 in MPS.

ATTENTION
Handwritten signature



Annex-A

8

9

**Rationalization of CT Posts @ 1 CT per 1.5 Section in
Middle/High/Higher Secondary Schools (Male)**

S.No	School Code	Name of Primary School	Total Enrolment	Sanctioned Posts after Rationalization		
				Class	No of Sections	CT
1	30036	GMS A	1-60	6 th	1	Minimum 2 CT per school afterward 1 per 1.5 section
			1-80	7 th	2	
			1-120	8 th	3	
2	25277	GHS B	1-60	6 th	1	Minimum 2 CT preschool afterward 1 per 1.5 section
			1-80	7 th	2	
			1-120	8 th	2	
			1-60	9 th	1	Minimum 4 SST per school (one Bio Chem) + one Math, Phy) and 2 SST Gen) afterward 2 SST per Section
			1-80	10 th	2	

Posting of Teachers on rationalization.

I am further directed to further clarify that:

1. On rationalization surplus teachers in Primary Schools, PST B-12, Senior PST B-14, may be posted in the nearest school if possible then in the same UCs and then in the same circle and then in the same Sub Division and then in the same District Subject to the provisions of need,
2. Senior most PSHT B-15, SPST B-14 & PST B-12 (According to the Seniority list) may be retained in the same school of their present posting and junior most may be transferred to other needy schools.
3. No teacher of CT B-16, PET B-16, AT B-16, DM B-16, TT-16, will be posted in Middle Schools.
4. Senior most Senior CT and SST (According to the Seniority list) may be retained in the schools of their present posting and junior most may be transferred to other schools.
5. Disable teacher may be retained in the schools of their present posting, another teacher may be shifted instead of disable.
6. Widow teacher may not be transferred to another school on rationalization, another teacher may be shifted instead of disable.
7. Two schools of same level working in one building may be merged with each other.

11/11/2014
Dy: Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

6160-67
Endst: No. / File No. J/A 33/KC/Slist; Dated Peshawar the 01/04/2014.

Copy forwarded for information and necessary action to the:-

1. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
2. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
3. M/File

11/11/2014
Dy: Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

ATTESTED

Kamran Malik
Adv

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR.

(15)

OFFICE ORDER :-

In supersession of this office order issued under Endst: No. 6782-96 dated 5/4/2014 and in pursuance of the orders conveyed vide Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar letter No. 6104-59/Rationalization/Estab: dated 01/04/2014 para No.7, the following Govt: Girls Primary Schools functioning in one premises with various title of school are merged with the school already functioning proper title with effect from 1/4/2014.

The senior most PSHT of the schools shown in column No. 6 will be act as a PSHT of the resultant school. The title of other schools stand abolished.

All the relevant record i.e, students attendance register, Teachers attendance, PIC registers etc: will be maintained by the PSHT of the host school. No Creation / abolition of post is involved.

S. No.	Name of Host school in which the schools given in Column No. 4 are to be merged.	school code	Name of schools to be merged with the school in Column: 2	School Code	Name of Teacher to act as PSHT in the host (Resultant) school.
1	GGPS Islamai College Peshawar	21276	GGPS Danish Abad	21242	Mst. Surayya Begum
2	GGPS Hayat Abad No. 1 Peshawar	21267	GGPS Hayat Abad No. 2	21268	Mst. Waheeda Begum
3	GGPS Hayat Abad No. 3 Peshawar	21269	GGPS Hayat Abad No. 4	32847	Mst. Najma Shaheen
4	GGPS Regi No 1 Peshawar	21497	GGPS Regi No 3	21499	Mst. Shadia
5	GGPS Regi Lalma No 2 Peshawar	32999	GGPS Regi Lalma No. 3	32999	Mst. Mussarat Begum
6	GGPS Shaheed Abad Peshawar	32859	GGPS Kotla Mohsin Khan	32844	Mst. Shahida Begum
7	GGPS Sangu No 1 Peshawar	21804	GGPS Sangu No 2	21503	Mst. Rubina
8	GGPS Sarband No 2 Peshawar	21529	GGPS sarband No 3	21507	Mst. Malwala Photoon
9	GGPS Police Colony 1 Peshawar	21299	GGPS Police Colony	21300	Mst. Farukh Hay
10	GGPS Dhaki Munawar Shah Pesh	21248	GGPS Andar Sher	21232	Mst. Shaheen Bano (Disable)
11	GGPS Gorgatri No 2 Peshawar	21258	GGPS yakatoot	21316	Mst. Nusrat Shaheen (Widow)
12	GGPS Jogiwar No2 Peshawar	21281	GGPS Jogiwar No1	21280	Mst. Nazma Ingeer
			GGPS Jogiwar No3	21282	
13	GGPS GulBad shah Jee	21260	GGPS Sara Kala Khan	21278	Mst. Shaheen Akhtar
14	GGPS Mohamand Abad Peshawar	21290	GGPS WazirBagh No.2	21314	Mst. Waheeda
15	GGPS Saeed Abad Peshawar	21306	GGPS Din Bahar No.1	21243	Mst. Shiraz Begum
16	GGPS Hazar Khawani 2 Peshawar	21272	GGPS HazarK hawani No.3	100074	Mst. Dilshad Begum
17	GGPS GulBahar No.3 Peshawar	21263	GGPS Gulbahar No.1	21261	Mst. Gul Hay
			GGPS Gulbahar No.4	32850	
18	GGPS Shah Jee Abad Peshawar	32859	GGPS Nanak Pura	21291	Mst. Lavida Akhtar
			GGPS Faqir Abad	21251	
			GGPS Zaryab Colony No.1	21317	

ATTESTED
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No.	Name of Host school which the schools given in Column No. 4 are to be merged.	School code	Name of schools to be merged with the school in Column: 2	School Code	Name of Teacher to act as PSIT in the host (Resultant) school.
19	GGPS Faisal Colony No.2 Peshawar	21249	GGPS Faisal Colony No.1 Peshawar	21250	Mst. Tasleem Begum
20	GGPS Afghan Colony No.2 Peshawar.	21228	GGPS Afghan Colony No.1 Peshawar	21227	Mst. Naseem Akhtar
			GGPS Afghan Colony No.3 Peshawar	21229	
21	GGPS Mohallah Islam Abad Peshawar	21289	GGPS Nishtar Abad Peshawar	21292	Mst. Zeenal Saba
22	GGPS Zaryab Colony No.2 Peshawar	21318	GGPS Dalazak Road Peshawar	21241	Mst. Nighat Behanna
23	GGPS Old Karim Pura Peshawar	21296	GGPS Gorgathri No.1 Peshawar	21257	Mst. Nadeem Parveen
24	GGPS No.1 Muhammadzai Peshawar	21462	GGPS Muhammad Zai No.2 Peshawar	21463	Mst. Hameeda Bano
25	GGPS No.1 ChohaGujar Peshawar	21366	GGPS ChohaGujar No.2 Peshawar	32854	Mst. Munira Iqbal
26	GGCMS Phandu Gharif Abad Peshawar	32853	GGPS PhanduBala Peshawar	2148	Already working SSI
27	GGPS Civil Quarter Peshawar	21239	GGPS Dehri Baghbanan Peshawar	21247	Mst. Inayat Begum
28	GGPS Railway Quarter Peshawar	212304	GGPS Railway Quarter No.2 Peshawar	21303	Mst. Nasim Akhtar
29	GGPS Nothia Qadeem Peshawar	21295	GGPS NothiaJadeed No.2 Peshawar	21294	Mst. Farhat Bibi
30	GGPS Deh Bahadar No.1 Peshawar	32871	GGPS Deh Bahadar No.2 Peshawar	21245	Mst. Shakila Akhtar
31	GGPS Bhatian Peshawar	21340	GGPS Garhi Abdul Samad Peshawar	21382	Mst. Kousar Jehan
32	GGPS Bazid Khel No.3 Peshawar	21351	GGPS Bazid Khel No.1 Peshawar	21349	Mst. Tasleem Begum
33	GGPS Cantt. No.3 Peshawar	21237	GGPS Cantt. No.1 Peshawar	21236	Mst. Humera Hargis
34	GGCMS Bara Sheikhan Peshawar	32869	GGPS Bara Sheikhan Peshawar	21347	Already working SSI
35	GGPS Wazir Bagh No.1 Peshawar	2313	GGPS Wazir Bagh No.3 Peshawar	21315	Mst. Naveeda Bano

District Education Officer,
(Female) Peshawar.

Endst: No. 6901-51 /F.No. ___/Merged School GGPS/P&D Dated Peshawar the 9th of April, /2014

Copy forwarded for information and strict compliance to the :-

1. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Accountant General Khyber Pakhtunkhwa Peshawar.
3. SDEO (Female) Peshawar with the remarks that feasible proposal of surplus staff of the above schools according to existing rules and policy should be furnished for adjustment in the required schools on need basis within two days positively.
4. Deputy Director EMIS Cell with the request to delete the schools mentioned in column No. 4 from data
5. All the ASDEO (Female) District Peshawar.
6. ADEO (Female) Establishment Primary Local Office.
7. ADEO P&D Local Office.

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OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR.

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OFFICE ORDER :

In continuation of this office order Endst: No. 6901-51 /Merged School /P&D dated 09/04/2014 and consequent upon the recommendation of SDEO (Female) Peshawar, the following PSHT-BPS-15 declared surplus as a result of merge in one school in one premises, are hereby adjusted as PSHT in the schools noted against each their names in the interest of public service with immediate effect.

Sr. No	NAME OF SURPLUS PSHT	From	To	Remarks
1	Noureen Afshan	GGPS Danish Abad	GGPS Bin Ghazai	Against vacant post
2	Nasim Begum	GGPS Hayatabad No.2	GGPS Mulla Zai	Against vacant post
3	Raziya Muzamil	GGPS Regi No.3	GGPS Sher Kalay	Against vacant post
4	Najia Sani	GGPS Regi Lalma No.3	GGPS Feroz Pur	Against vacant post
5	Shaheen Begum	GGPS Sangu No.1	GGPS Ghalib Khel Teleband	Against vacant post
6	Nargis Begum	GGPS Kotla Mohsin Khan	GGPS Afridi Abad	Against vacant post
7	Nizakat Kalsoom	GGPS Hayat Abad No.4	GGPS Paloseen Abad	Against vacant post
8	Samina Tabassum	GGPS Sarband No.3	GGPS Umar Abad (Zangali)	Against vacant post
9	Israj Begum	GGPS Police Colony No.2	GGPS Sufaid Sung	Against vacant post
10	Ullat	GGPS Phandu Bala	GGPS Garhi Afsar Khan	Against vacant post
11	Shabina	GGPS Choha Jugar No.1	GGPS Mera Umar Payan	Against vacant post
12	Farzana Tasleem	GGPS Gul Bahar No.3	GGPS Telaband Inzari	Against vacant post
13	Zain ul Sharf	GGPS Gul Bahar No.4	GGPS Namdar Khan Korona	Against vacant post
14	Rubina	GGPS Nanak Pura	GGPS Bela Mohmandan	Against vacant post
15	Najma Shaheen	GGPS Faqir Abad	GGPS Piyari payan	Against vacant post
16	Rukhsana Shaheen	GGPS Shah Jee Abad	GGPS Nalivi	Against vacant post
17	Baseerat	GGPS Faisal Colony No.1	GGPS Jati Bala	Against vacant post
18	Rubina Naz	GGPS Afghan Colony No.2	GGPS Faqir Garhi	Against vacant post
19	Rashida Begum	GGPS Afghan Colony No.3	GGPS Takhi Koroona	Against vacant post
20	Asmat Ara	GGPS Nishtar Abad	GGPS Agra Banda	Against vacant post
21	Nargis Siraj	GGPS Andar Sher	GGPS Ghari Wajid	Against vacant post
22	Sadia Hina	GGPS Sara e Kala Khan	GGPS Qila Shah Baig	Against vacant post
23	Irum Ambreen	GGPS Old Karim Pura	GGPS Jala Bela	Against vacant post
24	Farzana Yasmin	GGPS Yakaloot	GGPS Ali Zai	Against vacant post
25	Rani Gul	GGPS Din Bahar No.1	GGPS Takht Abad-2	Against vacant post
26	Khusnud Begum	GGPS Jogiwara No.2	GGPS Jogani	Against vacant post
27	Kousar Jabeen	GGPS Jogiwara No.3	GGPS Mian Jee Baba (Mattani)	Against vacant post
28	Alia Begum	GGPS Mohammad Abad	GGPS Darwazgi -2	Against vacant post
29	Dilshad Begum	GGPS Hazar Khawani No.2	GGPS Ghari Chandan Payan	Against vacant post
30	Imrana Toquir	GGPS Dala Zak Road	GGPS Bunyadi	Against vacant post
31	Sabida Jan	GGPS Cantt: No.3	GGPS Sama Badaber	Against vacant post

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	NAME OF SURPLUS PSHT	From	To	Remarks
32	Saboor Akhtar	GGPS Railway Quarter No.2	GGPS Aza Khel NO.1	Against vacant post
33	Insiem Ara	GGPS Civil Quarters	GGPS Sadeeq Abad(Mattani)	Against vacant post
34	Hoshad Begum	GGPS Deh Bahadar No.2	GGPS Sulman Khel	Against vacant post
35	Shatqat Bibi	GGPS Nothia Jadeed No.2	GGPS Gara Tajik	Against vacant post
36	Farzana Shaheen	GGPS Bathian	GGPS Ghari Chandan (Daudzai)	Against vacant post
37	Farida Qayyum	GGPS Bazid Khel No.3	GGPS Maryamzai NO.2	Against vacant post
38	Shakiba Naz	GGPS Bara Sheikhan	GGPS Mera Shaikhan	Against vacant post
39	Fozia Sharif	GGPS Wazir Bagh No.3	GGPS Mattani No.1	Against vacant post
40	Maqsooda	GGPS Muhammadzai No.1	GGPS Garhi Saidan	Against vacant post

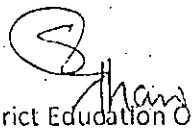
- Note:
1. Compliance should be reported to all concerned.
 2. Necessary entry to this effect should be made in their service book.
 3. No TA / DA is allowed.

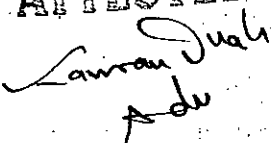
SAMINA GHANI
District Education Officer,
(Female) Peshawar.

Order No. 7040-7110 / Surplus PSHT Dated Peshawar the 11 / 04 / 2014

Forwarded for information and necessary action to the :-

1. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Accountant General Khyber Pakhtunkhwa Peshawar
3. Sub Divisional Education Officer (Female) Peshawar w/r to her No. 726 dated 10/4/2014
4. All ASDEO circles District Peshawar.
5. ADEO (Female) Primary local office.
6. PA to DFO (Female) Peshawar.
7. Teachers Concerned.


District Education Officer,
(Female) Peshawar.

ATTESTED

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OF THE DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR.

OFFICE ORDER.

Consequent upon approval by the competent authority, the following PSHT are hereby ordered on their own pay and BPS against the Schools mentioned against each name in the interest of public service with effect.

S. No	Name of Teacher	From	To	Remarks
1.	Mst: Irum Ambareen-PSHT	GGPS Jala Bela	GGPS Old Karimpura	V.S.No.2
2.	Mst: Nadra Parveen-PSHT	GGPS Old Karimpura	GGPS Jala Bela	V.S.No.1

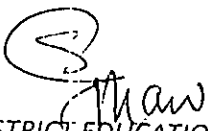
Note:- No TA/DA etc is allowed.
Charge report should be submitted to all concerned.

(SAMINA GHANI)
DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR.

✓ Endst: No. 7118-22 dated 12/04/2014.

Copy forwarded to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. SDEO(Female) Peshawar.
3. ASDEO Circle Concerned as desired.
4. Head Teachers concerned.
5. Teachers concerned.


DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR

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BEFORE THE SERVICES TRIBUNAL, KPK, PESHAWAR

Service Appeal No. _____/2014

Mst. Nadra Paryeen,
(PSHT), GGPS, Old Karimpura, Peshawar City.....Appellant

VERSUS

1. Distt Education Officer (Female),
Hashtnagri, Peshawar City
2. Director (Elementary & Secondary) Education,
Dabgari Garden, Peshawar
3. Mst. Iram Ambareen,
PHST, GGPS, Jala Bela, Distt Peshawar.....Respondents

Service Appeal against the order dated 12.04.2014 of respondent No.1, whereby appellant was illegally transferred from GGPS Old Karimpura, Peshawar to GGPS, Jala Bela, Peshawar.

Prayer in Appeal:

On acceptance of the instant service appeal, the impugned order dated 12.04.2014 issued by respondent No.1 may kindly be set aside and the appellant may kindly be restored in her original posting i.e. GGPS Old Karimpura, Peshawar as PSHT.

OR

Any other remedy which deems fit by this Honourable Tribunal in the interest of justice, may also be granted in favour of appellant.

ATTESTED

Lauran Dhal
Adv

Respectfully Sheweth:

Brief facts giving rise to the appeal are as under:

1. That the appellant was serving as PSHT in GGPS Gor Ghatri No.1, Peshawar.
2. That as per recent policy of rationalization, her school mentioned above, was merged into Old Primary School, Karimpura, Peshawar and through same policy order No.6901-51 dated 09.04.2014, she was posted as Headmistress, GGPS Old Karimpura, Peshawar. (Copy of order dated 09.04.2014 is annexed).
3. That her junior Mst. Iram Ambareen (respondent No.3) who fell surplus, was transferred to GGPS, Jala Bela vide letter No.7040-7110/surplus/PSHT dated 11.04.2014. (Copy of order dated 11.04.2014 is annexed).
4. That the appellant was shocked to receive Notification No.7118-22 on the next day i.e. 12.04.2014, wherein Iram Ambareen (respondent No.3) was posted against the policy in her place and she was sent to GGPS Jala Bela. (Copy of order dated 12.04.2014 is annexed).

ATTESTED

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5. That the impugned transfer order is the result of political interference at the instance of respondent No.3, who managed the impugned notification/transfer overnight.
6. That it is evident from the narration of facts that impugned transfer of the appellant is neither in normal course nor in public interest, but due to political clout and collusion between respondent No.1 and 3.
7. That the appellant preferred a departmental representation to respondent No.2, but the same has been filed. (Copy of representation and order of rejection are annexed).
8. That the impugned transfer orders are wholly illegal, malafide and made under dictation given by outsiders that it has been for extraneous reasons that offends the principles of natural justice, highly arbitrary, authoritative and oppressive and it proclaims its own malafidies. (Copy of policy letter is annexed).
9. That any other point may be agitated at the time of arguments with the kind permission of the Honourable Tribunal.

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For the aforesaid reasons, it is, therefore, most humbly prayed that on acceptance of this appeal, the impugned office order/ Notification No.7118-22 dated 12.04.2014 may be set aside and the appellant be allowed to continue at her present post as per earlier notification.

Any other remedy which deems fit by this Honourable Tribunal in the interest of justice, may also be granted in favour of appellant.

Through

Appellant

Shahid Naseem Khan Chamkani

Shahid Naseem Khan Chamkani

&

Ghulam Mohai-ud-Din

Ghulam Mohai-ud-Din
Advocates, Peshawar

Date: 17/4/2014

ATTESTED

Kamran Durrani
Adv

(3)

(19)

BEFORE THE SERVICES TRIBUNAL, KPK, PESHAWAR

Service Appeal No. _____/2014

Mst. Nadra Parveen.....Applicant/ Appellant


VERSUS

Distt Education Officer (Female) & others.....Respondents

AFFIDAVIT

I, Mst. Nadra Parveen, PSHT, GGPS, Old Karimpura, Peshawar City, do hereby solemnly affirm and declare that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.




DEPONENT

ATTESTED
Kamran Durrani
Adv

Annex - F

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Date of order/proceedings
2

Order or other proceedings with signature of Judge/Magistrate
3

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.**

Service Appeal No. 539/2014.
Mst. Nadra Parveen Versus District Education Officer (Female) Peshawar etc.

12.05.2015

PIR BAKHSII SHAH, MEMBER.- Counsel for the

appellant (Mr. Imtiaz Ali, Advocate) and Mr. Muhammad Jan GP for official respondents and counsel for private responder No. 3 (Mr. Muhammad Asif Yousafzai, Advocate) present.

2. Appellant Mst. Nadra Perveen is aggrieved with her transfer order dated 12.4.2014 whereby she was transferred from GGPS Old Karimpura, Peshawar to GGPS Jala Bela Peshawar vice Mst. Irum Ambareen who is respondent No. 3 in this appeal.

3. Facts in brief as revealed from record are that in pursuance of the government policy of rationalization, GGPS Old Karimpura, Peshawar and GGPS Gorgatri, Peshawar were fused together and renamed as GGPS Old Karimpur, Peshawar in which school appellant Mst. Nadra Perveen was posted as PSHT vide order dated 09.4.2014. Prior to the above amalgamation of the two schools, private respondent No. 3 was performing duty as PSHT in GGPS Old Karimpura whereas the appellant was performing duties as PSHT at GGPS Gorgatri, Peshawar. It seems that as a result of the above merger of the

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Khyber Pakhtunkhwa Service Tribunal, Peshawar

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Annex - F

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Date of
order/
proceedings
2

Order or other proceedings with signature of Judge/Magistrate
3

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.**

Service Appeal No. 539/2014,
Mst. Nadra Parveen Versus District Education
Officer(Female) Peshawar etc.

12.05.2015

PIR BAKHSII SHAH, MEMBER.- Counsel for the

appellant (Mr. Imtiaz Ali, Advocate) and Mr. Muhammad Jaleel
GP for official respondents and counsel for private responder
No. 3 (Mr. Muhammad Asif Yousafzai, Advocate) present.

2. Appellant Mst. Nadra Perveen is aggrieved with her
transfer order dated 12.4.2014 whereby she was transferred
from GGPS Old Karimpura, Peshawar to GGPS Jala Bela,
Peshawar vice Mst. Irum Ambareen who is respondent No. 3 in
this appeal.

3. Facts in brief as revealed from record are that in
pursuance of the government policy of rationalization, GGPS
Old Karimpura, Peshawar and GGPS Gorgatri, Peshawar were
fused together and renamed as GGPS Old Karimpur, Peshawar
in which school appellant Mst. Nadra Perveen was posted as
PSHT vide order dated 09.4.2014. Prior to the above
amalgamation of the two schools, private respondent No. 3 was
performing duty as PSHT in GGPS Old Karimpura whereas the
appellant was performing duties as PSHT at GGPS Gorgatri,
Peshawar. It seems that as a result of the above merger of the

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Signature
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

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two schools, private respondent No. 3 was declared surplus and vide order dated 09.4.2014 she was posted in GGPS Jala Bela against a vacant post. On 12.4.2012, the impugned order was passed as a result of which appellant and private respondent No. 3 were transferred against the posts of each other. Feeling aggrieved from this order, Mst. Nadra Perveen has brought this service appeal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974.

4. Arguments heard and record perused.

5. The learned counsel for the appellant submitted that per seniority list appellant is senior to private respondent No. 3 therefore, according to posting/transfer policy of the government, the appellant was entitled to have been left in GGPS Old Karimpur, Peshawar. It was further submitted that subsequent impugned order is the result of political interference therefore, the impugned order is not sustainable in the eyes of law, particularly in light of various decisions of the august apex courts.

6. The appeal was resisted by the learned counsel for private respondent No. 3 on the ground that before merger of the two schools, private respondent No. 3 was serving as PIIST in GGPS Old Karimpura Peshawar, meaning thereby that she was senior in the above school and as such she could not have been made surplus and then transferred to Jala Bela. It was further submitted that political interference was also exercised

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[Signature]
Secretary, Khyber Pakhtunkhwa Service Tribunal, Peshawar

ATTESTED

on the part of the appellant. The learned Government Pleader adopted arguments of the learned counsel for private respondent No. 3.

7. The Tribunal after going through the record has come to the conclusion that both the contesting parties have made efforts for political leverage which cannot be appreciated by this Tribunal in the light of decision of august Supreme Court of Pakistan and guidelines drawn in case of Anita Turab Versus Federation of Pakistan. It is evident that the appellant as well as private respondent No. 3 both are PSTs and the provincial government has already enacted Khyber Pakhtunkhwa (Appointment, Deputation, Posting and Transfer of Teachers, Lecturers, Instructors and Doctors) Regulatory Act, 2011. This may be observed that there is sufficient distance between GGPS Old Karimpura and GGPS Jala Bela whereas both the contesting parties aspire for their posting in GGPS Old Karimpura which means that the aforementioned law has not been taken into consideration by the competent authority while passing the impugned order. It also appears that departmental appeal of the appellant has been rejected by the competent authority on the very date on which the appeal was made and no reason has been given. Thus disposal of departmental appeal of the appellant is in conflict with the provision of Section 24 of General Clauses Act, 1897. It also transpired from record that the impugned order has been held in abeyance by the District Education Officer (Female)

ATTESTED
MEMBER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

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Peshawar vide her order dated 20.6.2014 which means that status quo situation is in vogue at present.

8. Hence in the light of the aforesaid discussion it is the considered opinion of this Tribunal to treat this appeal as appeal before the departmental appellate authority with direction to decide the matter within one month of the receipt of this order so that smooth running of the school is not disturbed by order of this Tribunal and thus we would like not to interfere with the impugned order which matter is left for decision of the appellate authority. The appeal is disposed of accordingly. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
12.5.2015

Certified true copy
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

Sy Mir Bahadur Ghori
Member
Sy Abdul Latif
Member

14-5-2015

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14-5-2015

14-5-2015

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**DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION KHYBER
PAKHTUNKHWA.**

No. 2502 F.No: Appeal/Court Cases/PSHT(F)
Dated Peshawar the: 18/5/2015

To

The District Education Officer
(Female) Peshawar.

Subject:- APPEAL

Memo:-

I am directed to refer to the subject cited above and in pursuance of Service Tribunal KPK Peshawar Judgment in Service appeal No.539/2014 announced on 12/05/2015 and you are directed to check the Seniority of both the PSHT and decide the case on seniority and merit basis under intimation to all concerned.

Copy of the Judgment is attached herewith.

[Signature]
Deputy Directress (Estab.)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.

Endst: No. _____/

Dated Peshawar the 18/5/15/2015

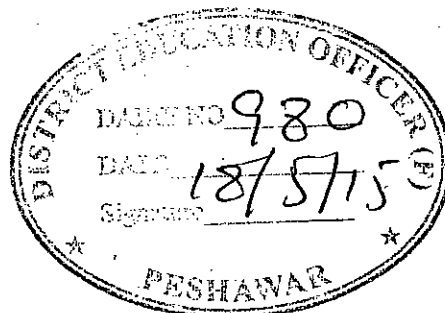
Copy forwarded to the :-

1. Registrar Service Tribunal KPK Peshawar for information Please.

[Signature]
Deputy Directress (Estab.)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.

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Kamran Dinali
Asst



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OFFICE OF DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR.

NO. 8619 /Appeal against transfer PST

Dated 27/5 /2015.

To

The Director
Elementary & Secondary Education Khyber Pakhtun Khwa
Peshawar.

Subject: APPEAL.


Memo:-

Kindly refer to decision of hon'able Khyber Pakhtun Khwa Service Tribunal announced on 12/05/2015 in the service appeal No.539/2014, whereas appellate authority was directed to decide the matter within one month of the receipt of this order so that smooth running of the school is not disturbed by the order of the Tribunal.

The undersigned has requested your office vide letter No.7891 dated 21/05/2015 for seeking guidance in the matter. In response to the above letter the undersigned was directed by your office to decide the case as per decision of the hon'able Khyber Pakhtun Khwa service Tribunal.

If agreed to, the following proposal is submitted for approval please.

S#	Name/School	Adjusted at	Remarks
1.	Ms.Irum Ambareen, PSHT GGPS GGPS Old Karimpura Peshawar.	GGPS Old Karimpura Peshawar.	Already occupied by her
2.	Ms.Nadra Parveen, PSHT under order of adjustment to GGPS Jala Bela Peshawar.	GGPS Gulbela Kochian Peshawar.	Against vacant post


DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR

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Lamrand ual
Adv

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER
PAKHTUNKHWA, PESHAWAR

Annex-I

25

NOTIFICATION.

1. WHEREAS, Mst. Nadra Parveen PSHT GGPS Old Karimpura Peshawar was transferred to GGPS Jala Bela Peshawar vide District Education Officer (F) Peshawar order dated 12/04/2014.
2. AND WHEREAS, the appellant lodged an appeal No.539/2014 in the Khyber Pakhtunkhwa Service Tribunal Peshawar against the order of the DEO (F) Peshawar.
3. AND WHEREAS, the Khyber Pakhtunkhwa Service Tribunal in his detail decision treat her departmental appeal before the appellate authority with the direction to decide the matter within one month.
4. AND WHEREAS, after the examining of transfer proposal of District Education Officer (F) Peshawar vide her letter No.8619 dated 27/5/2015.
5. NOW, THEREFORE, In the capacity of the competent authority is pleased to approve the adjustment proposal of the District Education Officer (F) Peshawar vide No.8619 dated 27/5/2015 with the direction to go ahead in the matter under intimation to all concerned.

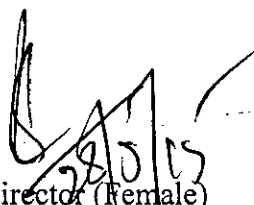
DIRECTOR
ELEMENTARY & SECY; EDUCATION
KHYBER PAKHTUNKHWA

Endst: No. 2910-16 /F.No.32/F/Appeal NSR

Dated Pesh: the 28/5/2015

Copy of the above is to the:-

1. Chairman Khyber Pakhtunkhwa Service Tribunal Peshawar.
2. District Education Officer (F) Peshawar.
3. Accountant General Khyber Pakhtunkhwa Peshawar.
4. SDEO (F) Peshawar.
5. Mistress concerned.
6. PA.to Director (E&SE) Khyber Pakhtunkhwa, Peshawar.
7. M/File.


Deputy Director (Female)
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

ATTESTED
Lauran DUAL
Adu

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR

OFFICE ORDER:

Consequent upon the approval of the Competent Authority the following PSHTs Female is hereby adjusted on their own pay and BPS in the schools mentioned against each their name with immediate effect.

S#	Name of Teachers / School	Adjusted at	Remarks
01	Ms. Irum Ambreen PSHT GGPS Old Karim Pura Peshawar	GGPS Old Karim Pura Peshawar	Already Occupied by her
02	Ms. Nadra Parveen PSHT under order of adjustment to GGPS Jala Bela Peshawar	GGPS Gul Bela Kochian Peshawar	Against Vacant post

- Note:-
1. Charge report should be submitted to all concerned..
 2. TA/DA is not allowed

(SAMINA GHANI)
DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR

Endst: No. 8682-87

Dated 28/5/2015

Copy of the above is forwarded to the:-

1. Director (E & S E) Department Khyber Pakthunkhwa Peshawar w/r to Notification issued vide Endst: No.4910-16/F.No.32/F/Appeal NSR Dated 28/05/2015
2. Accountant General Khyber Pakthunkhwa Peshawar.
3. SDEO (Female) Peshawar
4. ASDEO (Female) Circle Concerned.
5. Head Teacher Concerned
6. Teachers Concerned.

ATTESTED

Kamran DUALI
Adv

S Ghani
DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR

Annex - K

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR.
 FINAL SENIORITY LIST OF PST (FEMALE) DISTRICT PESHAWAR

S#	Circle	School Name	Teacher name	Father Name	Domicile	Academic Qual:	Professional Qual:	DOB	D.O 1 st Appt: in Edu: Deptt:	D.O Passing P.Quali:	D.O Taking Over charge on present post
1	3	2	4	5	6	8	10	11	12	13	14
1	CITY	GGPS OLD KARIM	NAHEED AKHTAR	ALLAH BAKSH	PESHAWAR	SSC	PTC	11/09/1952	23/06/1971	24/05/1971	23/06/1971
2	HAYATABAD	GGPS NO.1 BAKA	KHATOON BEGUM	Khair Muhammad	PESHAWAR	FA	PST	02/03/1954	28/05/1972	05/03/1972	28/05/1972
3	CITY	GGPS JOGIWARA	NASIM AKHTAR	TILA MOHD	PESHAWAR	SSC	PTC	14/02/1953	06/01/1972	21/07/1972	21/02/1972
4	City	GGPS JEHANGIR	SHAGUFTA ROHI	ABDUL AZZI KHAN	PESHAWAR	SSC	PTC	05/04/1953	20/04/1972	21/07/1972	21/07/1972
5	CITY	GGPS RASHID ABAD	SHAMIM AKHTAR	ANWAR ILAHI	PESHAWAR	SSC	PTC	20/10/1953	20/4/1972	21/07/1972	21/07/1972
6	CITY	GGPS ZARGAR ABAD	SHAGUFTA TABASSUM	H TAF HUSSAIN	PESHAWAR	SSC	PTC	01/03/1954	22/4/1972	21/07/1972	21/07/1972
7	CITY	GGPS FAISAL COLONY	ABIDA YASMEEN	MALIK MOHAMAD IRFAN	PESHAWAR	FA	CI/ps	03/01/1955	12/04/1973	08/06/1973	12/04/1973
8	CITY	GGPS FAISAL COLONY	FARHAN BEGUM	ABDUL AZIZ	PESHAWAR	MA	PTC	15/05/1955	13/05/1973	15/09/1972	13/05/1973
9	CITY	GGPS FIDA ABAD	NAHEED	AGHA JAN	PESHAWAR	SSC	PTC	15/08/1953	10/01/1977	31/08/1973	31/08/1973
10	HAYATABAD	NO 2 TEHR AL BATA	SOFIA NAHEED	SHER AHMAD	PESHAWAR	SSC	PST	25/04/1956	12/11/1973	24/10/1974	13/11/1973
11	Chaghulpur	GGPS BLOWI	ZAKIA PERVEEN	FAZAL MEHMUD	PESHAWAR	SSC	PTC	03/01/1955	22/12/1973	31/08/1973	22/12/1973

ATTESTED
 Kamran Durrani
 sdu

314	Chaghulpur a	GGPS MUHAMMA D ZAI	MAQSOOD A SHUAIB	MUHAMMAD SHUAIB	PESHAWAR	FA	PTC	11/04/1969	15/11/1990		
315	CITY	GGPS DEEN BAHAR COLONY NO.1	SAMINA TAJ	SAFDAR JHANG	PESHAWAR	SSC	PTC	01/04/1970	19/11/1990	07/08/1990	19/11/1990
316	Chaghulpur a	GGPS MASMA	BIBI BANAT	MUKARAM KHAN	CHITRAL	SSC	PTC	20/04/1966	15/07/1985	15/05/1989	28/11/1990
317	CITY	GGPS KHYBER COL: YOUSAF	MAHNAZ BEGUM	NOSHAD KHAN	PESHAWAR	SSC	PTC	13/06/1960	16/02/1987	30/11/1990	30/11/1990
318	MATHRA	GCMS GELGI KINDER	SAEEDA BEGUM	ABDUL HAMEED	PESHAWAR	SSC	PTC	24/01/1961	01/02/1988	30/11/1990	30/11/1990
319	CITY	GGPS GOAR GATHRI	NADRA PERVEEN	NASEER AHMAD	PESHAWAR	MA	PTC/CT	01/03/1963	13/01/1988	30/11/1990	30/11/1990
320	DAUDZAI	GGPS KHAZANA BAYAN	FALAK NAZ	NIAMATULLA H	MARDAN	SSC	PTC	31/05/1965	22/09/1985	30/11/1990	30/11/1990
321	City	GGPS Wazir Bagh No 1	Ra:hida Bano	Saida Jan	Peshawar	SSC	PTC	05/11/1965	10/11/1987	30/11/1990	30/11/1990
322	CITY	GGPS YAKAFOOT	ZILI HUMA	SINAYAT ALI SHAH	PESHAWAR	FA	PTC	24/02/1966	17/10/1989	30/11/1990	30/11/1990
323	CITY	GGPS NEW KARIM PURA	RIFAT MUSHTAQ	MUSHTAQ HUSSAIN	PESHAWAR	FA	PTC	26/05/1969	22/09/1988	30/11/1990	30/11/1990
324	MATHRA	GGPS PEER KILLI MATHRA	RIFFAT ZEBa	HABIBULLAH KHAN	PESHAWAR	FA	PTC	15/04/1967	07/06/1987	05/06/1986	02/12/1990

TESTED
Kamran Durrani
Adh

489	Chaghulpur a	GGPS SARDAR CABLI	NAFEESA BANO	GHULAM Khawaja	PESHAWAR	BA	PTC/CT	05/08/1970	12/05/1993	21/11/1992	12/05/1993
490	CANTT:	GGPS LANDI ADBAR	GUL E RANA	Qazi IMTIAZ AHMAD	PESHAWAR	BA/BEd	PTC/CI	15/08/1972	12/05/1993	03/08/1992	12/05/1993
491	CITY	GGPS AFGHAN COLONY	FARZANA BEGUM	ABDUL HAMEED	PESHAWAR	FA	PTC	01/04/1967	13/05/1993	27/10/1992	13/05/1993
492	CANTT:	GGPS CANTT NO	RIZWANA NAHEED	SAID AHMED	PESHAWAR	MA	PTC/CI	16/02/1968	13/05/1993	30/11/1990	13/05/1993
493	CHAGHULP URA	GGPS GHAMKANI SID	SAEEDA AMAN	AMAN ULLAH KHAN	PESHAWAR	MA	PTC	01/03/1972	13/05/1993	21/11/1992	13/05/1993
494	CITY	GGPS Rasheed AL	ZAKIA AMAN	FAZAL MUHAMMAD	PESHAWAR	BA	PTC	30/08/1972	13/05/1993	09/12/1992	13/05/1993
495	CITY	GGPS SHAIKH AB	SHABANA ROHI	ASHIQ HUSSAIN	PESHAWAR	BA	PTC	05/01/1973	13/05/1993	13/05/1993	13/05/1993
496	CITY	GGPS OLD KARIM DUBA	IRUM AMBAREEN	ABDUL HAI KHAN	PESHAWAR	MA/MEd	PTC/CT	15/03/1973	13/05/1993	16/03/1991	13/05/1993
497	HAYATABA D	GGPS NO.1 HAYA TABAD	RUKHSANA BEGUM	ATAA MUHAMMAD	PESHAWAR	FA	PTC	08/12/1972	15/05/1993	09/12/1992	15/05/1993
498	CITY	GGPS AFGHAN COLONY	SHAZIA SHAMS	SHAMS UD DIN	PESHAWAR	FA	PTC	02/03/1974	15/05/1993	09/12/1992	15/05/1993
499	Chaghulpur a	GGPS KANDI HAYAT	RAHEELA PERVEEN	ABDUL AZIZ	PESHAWAR	SSC	PTC	04/10/1969	16/05/1993	05/12/1992	16/05/1993
500	MATHRA	GGPS SHEENA CABLI	SAMINA GUL	HABIBULLAH	PESHAWAR	SCC	PTC	02/07/1967	17/05/1993	16/03/1989	17/05/1993
501	HAYATABA D	GGPS FOREST COLLECT	Robeeca	NAZIR MASEH	PESHAWAR	B.A. CT	PTC/CI	24/12/1970	18/05/1993	03/08/1992	18/05/1993

Attested
Kamran Durrani
Adu

**BEFORE THE HON'BLE CHAIRMAN, KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR**

Application in Service Appeal No. _____ 2015

1. Mst. Nadra Perveen,
(PSHT), GGPS, Old Karimpura, Peshawar City

APPELLANT / APPLICANT

VERSUS

1. Director (Elementary & Secondary) Education, Dabgari Garden, Peshawar and others.

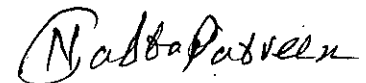
RESPONDENTS

**APPLICATION FOR SUSPENDING THE
OPERATION OF THE IMPUGNED
ORDER NO. 8682-87 DATED 28-5-2015
WHEREBY THE APPELLANT WAS
ILLEGALLY TRANSFERRED FROM
GGPS OLD KARIMPURA PESHAWAR TO
GGPS GUL BELA KOCHIAN PESHAWAR
2015 MAY GRACIOUSLY BE SET ASIDE
BY RETAINING THE APPELLANT AT
GGPS, OLD KARIMPURA PESHAWAR
UNDER THE POLICY OF
RATIONALIZATION CIRCULATED BY
THE GOVERNMENT OF KHYBER
PAKHTUNKHWA VIDE NO. 6104-59
DATED 1-4-2014 TILL THE DISPOSAL OF
THE MAIN APPEAL.**

Respectfully Sheweth:-

1. That the appellant has filed service appeal along with this application in which no date has been fixed so far.
2. That the facts enumerated and grounds taken in the body of service appeal may kindly be considered as an integral part of this application, which make out an excellent prima facie case in favour of the appellant.
3. That the impugned order has been passed on the basis of political interference, favoritism / nepotism and also in utter violation of relevant Policy/law.
4. That the Appellate Authority was under statutory obligation to comply with the order of this Hon'ble Tribunal dated 21-5-2015 in letter in spirit but he failed to do so for the reasons that neither the seniority of the appellant nor the relevant Act 2011 has been taken into consideration and that the appellant was transferred outside her Union Council i.e (from UC-19 to UC-73 Gul Bela).
5. That if the operation of the impugned order is not suspended, the very purpose of appeal would be defeated and it would become infructuous as well

It is, therefore, humbly prayed that the impugned order No. 8682-87 dated 28-5-2015 whereby the appellant was illegally transferred from GGPS old Karimpura Peshawar to GGPS Gul Bela Kochian Peshawar 2015 may graciously be set aside by retaining the appellant at GGPS, Old Karimpura Peshawar under the policy of rationalization circulated by the Government of Khyber Pakhtunkhwa vide No. 6104-59 dated 1-4-2014 till the disposal of the main appeal



Appellant/Applicant

Through



Rizwanullah
M.A. LL.B

Advocate High Court, Peshawar

Dated: 3-6-2015

BEFORE THE CHAIRMAN, KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

In the matter Service Appeal No. _____/2015

1. Mst. Nadra Perveen,(PSHT),GGPS, Old Karimpura, Peshawar City.
- 2.

APPELLANT

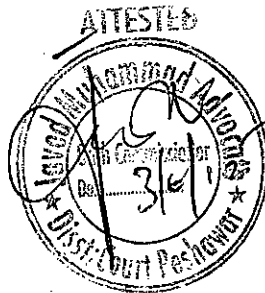
VERSUS

1. Director (Elementary & Secondary) Education, Dabgari Garden, Peshawar and others.

RESPONDENTS

AFFIDAVIT

I, Mst. Nadra Perveen, (PSHT),GGPS, Old Karimpura, Peshawar city, do hereby solemnly affirm and declare that the contents of the accompanied Stay Application are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Tribunal.



Nadra Perveen

Deponent

بعدالت جناب

BEFORE HON'BLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR.

2015ء منجانب

MST. NADRA PERVEEN

بنام

VS

DIRECTOR (ELEMENTARY & SECONDARY)

EDUCATION, DARGARI GARDEN, PESHAWAR
AND OTHERS...

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کاروائی متعلقہ
آن مقام پشاور کیلئے صوان اشد و کامران اشد ایڈوکیٹس
مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب
کو راضی نامہ کرنے و تقرر ثالث فیصلہ بر حلف دیئے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے
اجراء اور وصولی چیک دروہیہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق زاریں پر دستخط کرانے کا اختیار ہوگا۔
نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور سنوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی
کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار
قانونی کراپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ اختیارات
حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا۔ دوران مقدمہ میں جو خرچہ و ہرجانہ التوائے
مقدمہ کے سبب ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوئے
کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

المرقوم 3 ہون 2015

کیلئے منظور ہے۔

بمقام پشاور.....

M Nadra Perveen

Attested & Accepted

H

Lamran Devali
Advocate.

5/6/15

1023

26/6/15 B-114

To,

The District Education Officer,
(Female) Peshawar.

A.W.F. PROVINCE
Service Tribunal

Diary No. 463

Date 9/6/15

Subject SUSPENSION OF TRANSFER ORDER.

Memo:

Respectfully it is submitted that I have been transferred to GGPS Gulbela Kochian Peshawar vide your office order No.8682-87 dated: 28/05/2015.

The learned Court in service appeal No.596/2015 on 05/06/2015 has suspended the such order till the decision of the Court.

It is therefore requested that my transferred order may kindly be suspended in the light of Court orders and allow me to work as a PSHT at GGPS Old Karim Pura Peshawar.

Copy of the Court orders is attached herewith.

Your's obediently

Nadra Parveen, PSHT

GGPS Old Karim Pura Peshawar

Copy forwarded to the :-

1. Director (E&SE) KPK Peshawar.
2. Registrar Service Tribunal Peshawar.

Your's Obediently

N. Parveen

Nadra Parveen, PSHT

GGPS Old Karim Pura Peshawar



put up to the court with relevant apprel.

h. s. e.
11/6/15

Deo di
concerned.

BEFORE THE HON'BLE CHAIRMAN, KHYBER PAKHTUNKHWA

SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 596 /2015

Mst. Nadra Perveen,
(PST), GGS, Old Karimpura, Peshawar City.

APPELLANT

VERSUS

1. Director (Elementary & Secondary) Education, Dabgar Garden, Peshawar.

2. District Education Officer (Female), Hashnagri, Peshawar City.

3. Mst. Iram Ambreen,

PHST, GGS, Jala Bela, District Peshawar.

RESPONDENTS

APPEAL UNDER SECTION 4 OF THE

KHYBER PAKHTUNKHWA SERVICE

TRIBUNAL ACT, 1974 AGAINST THE

IMPUGNED ORDER NO. 8682-87 DATED

28-5-2015 WHEREBY THE APPELLANT WAS

ILLEGALLY TRANSFERRED FROM GGS

OLD KARIMPURA PESHAWAR TO GGS GUL

BELA KOCHIAN PESHAWAR.

Prayer in Appeal

By accepting this appeal, the impugned order No.8682-87 dated 28-5-2015 may graciously be set aside and the appellant may kindly be retained at GGS, Old Karimpura Peshawar under the policy of rationalization circulated by the Government of Khyber Pakhtunkhwa vide No. 6184-59 dated 1-7-2014.

03/06/2015
J.O.A.
PESHAWAR

M. W. R. PROVINCE
SERVICE TRIBUNAL
DIRTY NO. 633
03-6-2015

05.06.2015

Counsel for the appellant (Mr. Rizwanullah, Advocate) present. Learned counsel for the appellant submitted that in flagrant violation of law, rules and transfer policy of the Government, appellant who is a PSHT in GGPS, old Karimpura, Peshawar City and whose Union Counsel is 19 Gunj, has been transferred to Union Counsel No. 73 Gul Baila. It was further submitted that appellant is senior in the list being at serial No. 319 where-as the private respondent No. 3 is at serial No. 496 and this legal and policy dimension was also ignored in the impugned order. It was further submitted that the impugned order is neither based on law nor based on rationale reasons and the same is incongruous to section 24-A of General Clauses Act. Reliance was placed on 2011 SCMR page-1. Learned counsel for the appellant further submitted that the appeal is competent under Section 4 of the KPK Service Tribunal Act, 1974 and further that the impugned order may be suspended for which purpose a separate application is appended with the appeal and in case the impugned order is not suspended, the very purpose of appeal will be defeated and the appeal will become infructuous.

During the course of preliminary hearing, however, it came to know that a previous appeal of the appellant was disposed of by this Tribunal and this would require further consideration and arguments as to whether the previous order of this Tribunal was ignored or not acted upon in letter and spirit for which reason it would be proper to give pre-admission notice to the respondents, as well as learned Addl: A.G. Since the learned counsel has worked out that the matter is urgent, therefore operation of the impugned order is suspended till the date fixed. Notice be issued to the respondents. To come up for further preliminary hearing on 26.6.2015.

Certified
 [Handwritten signature and stamp]

SRP
Member

9-6-2015
 800
 6
 2
 8
 9-6-2015
 9-6-2015

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Most Immediate
Court Matter

DIRECTORATE ELEMENTARY & SECONDARY EDUCATION
Khyber Pakhtunkhwa, Peshawar.



No 90 / AD(Lit: II)

Dated Peshawar the 3/8 /2015

To
The District Education Officer
(PA), Peshawar.

Subject :- **SUBMISSION OF COMPLETE SERVICE RECORD IN SERVICE**
APPEAL No: 596/2015, CASE TITLED NADRA PARVEEN PSHT GGPS
KARIM PURA, PESHAWAR VERSUS EDUCATION DEPARTMENT
FIXED FOR HEARING ON 10/8/2015.

Memo:
I am directed to & refer the order sheet dated 09-7-2015, passed by the Honorable Khyber Pakhtunkhwa, Service Tribunal, Peshawar in the titled case & to state that the Respondents No:1 & 2 have been called in person alongwith relevant record to show the reason as to whether previous judgment dated 12-5-2015 of this Honorable Tribunal & requirements of the very Rationalization policy & Regulatory Act particularly have been complied with the while passing impugned order or otherwise.

Therefore, you are hereby directed to provide & submit the required Rationalization record in the light of the directions / judgment dated 12-5-2015 rendered in service appeal No: 539/2014 on the same title positively with the intimation to the undersigned so as to avoid adverse action / remarks of the Honorable Service Tribunal in the instant Service Appeal.

[Signature]
Asstt: Director (Lit: II)
(E&SE) Khyber Pakhtunkhwa
Peshawar.

Endst No: 91-94

Copy forwarded to :-

- 1 Registrar Khyber Pakhtunkhwa, Service Tribunal, Peshawar
- 2 Addl: Advocate General Khyber Pakhtunkhwa, Service Tribunal, Peshawar
- 3 Section Officer (Litigation-II) E&SE Department, KPK Peshawar
- 4 Addl: Director (Estab:), local Directorate.
- 5 PA to Director, local Directorate.

[Signature]
Asstt: Director (Lit: II)
(E&SE) Khyber Pakhtunkhwa
Peshawar.



KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

No. 1076-77/ST


Dated 14/7/2015

To

1. The Director E&SE,
Peshawar.
2. DEO (Female),
Hashtnagri, Peshawar City.

Subject: - APPEAL NO 596//2015 MST. NADRA PERVEEN ~~ABDUL QADIR~~ VS
DIRECTOR E&SE, PESHAWAR AND OTHERS.

I am directed to forward herewith a certified copy of order dated 9.7.2015 passed by this Tribunal on the above service appeal for strict compliance.


REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.

3. That Para-3 of the instant application is incorrect and misleading hence denied. The impugned transfer order is without any political interference,

45

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BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR

SERVICE APEAL NO. 596/2015

Mst: Nadra Perveen VS Director (E & SE) KPK & others

Reply on Behalf of Respondents No. 1 & 2 to Application for and interim relief.

Respectfully Sheweth:-

The Respondents submit as under:-

Preliminary Objections.

1. That the applicant has no cause of action / locus standi to file the instant application.
2. That the instant application is based on mala fide intention.
3. That the applicant has not come with clean hands to this Hon' able Tribunal.
4. That the instant Application is not maintainable in the present form.
5. That this Hon' able Tribunal has got no jurisdiction to adjudicate upon the instant application.
6. The instant application is barred by law.


On Facts.

1. That Para-1 is legal, hence no comments.
2. That as the instant application is based on mala fide intention and makes out no prima facie case in favour of the applicant, hence para-2 of the instant application is incorrect and misleading.

- 45
3. That Para-3 of the instant application is incorrect and misleading hence denied. The impugned transfer order is without any political interference, favouritism /Nepotism and is according to the law, rules and policy.
 4. That Para-4 is also incorrect and misleading, hence denied. Moreover, the Respondent Department has decided the Departmental Representation on merits of the case wherein the Respondent No.3 who was already the Head Teacher of the Host School, Therefore, The Respondent Department has correctly retained the Respondent No.3 as the Head Teacher of the Host School i.e. GGPS ,Old Karim Pura Peshawar.
 5. That as there is no apprehension of any irreparable loss to the Applicant, therefore, Para-5 is incorrect and misleading, hence denied.

It therefore, humbly prayed that on the acceptance of this reply , the instant application may very kindly be dismissed and the status quo order passed in favour of the applicant may also be vacated.


Director,
(E &SE) KPK, Peshawar.


District Education Officer,
(Female) Peshawar.

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BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR

SERVICE APEAL NO. 596/2015

Mst: Nadra Perveen VS Director (E & SE) KPK & others

Reply on Behalf of Respondents No. 1 & 2

Respectfully Sheweth:-

The Respondents submit as under:-

Preliminary Objections.

1. That the appellant has no cause of action / locus standi.
2. That the instant appeal is based on mala fide intention.
3. That the appellant has not come with clean hands to this Hon' able Tribunal.
4. That the instant Appeal is not maintainable in the present form.
5. That this Hon' able Tribunal has got no jurisdiction to adjudicate upon the instant appeal.
6. That the instant appeal is barred by law.

On Facts.

1. That Para-1 is correct to the extent that the appellant was the Head Teacher of GGPS Gor Ghatri No.1 Peshawar and the said school was shifted to GGPS old Karim Pura and then it was merged into the said school i.e. GGPS old Karim Pura.
That the Appellant was wrongly made the Head Teacher of the Host School, so after removing this anomaly, the Respondent No.3, who was Senior most in her school and was also the Head Teacher of the Host school, was made the Head Teacher of GGPS Old Karim Pura Peshawar before merging of GGPS, Gor Ghatri into GGPS Old Karim Pura Peshawar and the appellant was transferred to some other school on the vacant post in the interest of public.

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2. Incorrect. That Respondent No.3 was already the Head Teacher of the Host school i.e. Old Karim Pura School, therefore Respondent No.3 was retained as the Head Mistress of the Host school. As Respondent No.3 was senior most in her school, therefore, Respondent No.3 was wrongly transferred to GGPS, Jala Bela.
3. That the appellant filed service appeal along with application for the suspension of operation of the impugned transfer order and the same were duly replied by the Respondents.
4. That the service appeal of the appellant was converted into Departmental Representation by this Hon' able Tribunal and the same has been duly decided by the Respondent Department.
5. That Para-5 is correct. Moreover, Respondent No.2 has decided the Departmental Appeal on merits.
6. Incorrect. The Respondent No.2 after complying with the directions of the appellate authority submitted a comprehensive report/Proposal which was duly approved. Moreover, the Departmental Appeal was decided on merits and has retained the Respondent No.3 as the Head Mistress of GGPS Old Karim Pura as she was already the Head Mistress of the said Host school.
7. Incorrect. That according to the need and public interest, transfer of a civil servant is the prerogative of the competent authorities, hence Para-7 is denied.
8. Incorrect. That the appellant has been transferred in the best interest of public and there was no vacant post of Head Mistress in her own UC or any other adjustment UC, therefore, the appellant has been transferred according to the need and availability of vacant post. Moreover, the Head Teacher post BPS -15 is a district cadre not a UC cadre post, therefore, where the post of Head Teacher is vacant in the district, the Head Teacher can be transferred to that post.
9. That the Appellant has got no cause of action to file the instant appeal.

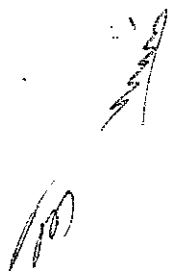
On Grounds.

- A. That Ground -A is incorrect and misleading, hence denied. The impugned transfer order has been made in the best interest of public and is according to law.
- B. Incorrect. That as Respondent No.3 was senior in her school and was the Head Mistress of that school i.e. Host school, therefore, Respondent No.3 has been retained in her own school and the appellant who was the Head Mistress of Guest School, has been transferred according to the need and availability of vacant post.

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- C. Incorrect. That the Departmental Appeal has been decided according to the merits, hence Ground-C is denied.
- D. That Ground-D is incorrect and misleading, hence denied. The appellant was dealt in accordance with law, Rules and policy on the subject.
- E. That Ground-E is incorrect hence denied. No favouritism has been made in the instant case.
- F. That Ground-F is incorrect and misleading, hence denied. The impugned order is passed in total conformity with the requirement of law, hence liable to be maintained.
- G. That Ground-G is incorrect. The impugned order is passed in accordance with law and materials on record.
- H. That Ground-H is also incorrect. The order of Respondent No.3 is according to law, facts and norms of justice.
- I. That Ground-I is incorrect and misleading, hence denied. The impugned transfer order is transparent and in accordance with law, rules and policy.
- J. That the Respondent No. 1 and 2 also seek leave of this Hon' able Tribunal to raise additional Grounds and present case law at the time of arguments.

It is therefore, humbly submitted that on acceptance of this reply on behalf of Respondent No. 1 & 2, the instant appeal may very kindly be dismissed with cost.



Director,
(E &SE) KPK, Peshawar.



District Education Officer
(Female) Peshawar.

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.

APPEAL NO. 596/2015

Nadra Parveen.

VS

Education Deptt:

REPLY ON BEHALF OF RESPONDENT NO. 3

(IRUM AMBREEN)


R.SHEWETH.

PRELIMINARY OBJECTIONS:

- 1- The appellant has no cause of action.
- 2- The appellant has no locus standi.
- 3- The appellant cannot ask for choice posting under section 10 of the Civil Servant Act, 1973 nor can ask as such under section 4-(b) of the Service Tribunal Act 1974.
- 4- That the replying respondent also belongs to U/C-19.
- 5- The appeal in hand is not entertainable being made without preferring departmental appeal.
- 6- The appeal is bad for non joinder of necessary parties, especially Govt: and secretary Education.
- 7- The appeal in hand is also bad for non impleadment of Dy: Director against whose order appeal is preferred.
- 8- The appellant is estopped due to her own conduct to institute the present appeal.
- 9- The appellant's school has been abolished; therefore, principally she is liable to be transferred.

FACTS:

- 1- Incorrect and misconceived. The appellant's school was abolished and therefore, she should be transferred rather to disturb the replying respondent.

- 
- 2- Incorrect and misconceived. As per policy of the education Deptt; senior most of the school is to be retained in the school and not the new comer. More over there were serious threats to the life of the replying respondent and her family, therefore, on appeal, the respondent.3 was retained in the school by the competent authority. Copy of the letter is attached as Annexure – A.
 - 3- No comments, but as the replying respondent was holding the charge , therefore as per status quo order she kept continued her duty.
 - 4- Correct. The appellate authority was directed to decide the said appeal.
 - 5- Denied for want of knowledge.
 - 6- Not related to replying respondent. More over the replying responded was senior teacher of the school is to be posted there while the appellant's school was abolished, therefore she should be adjusted somewhere else.
 - 7- Not related to replying respondent. However, it is added that the appellant cannot ask for choice posting. More over the replying respondent's tenure was not completed then how she could be transferred.
 - 8- Not related to replying respondent. However it is added that as per Regulatory Act the replying respondent can also not be transferred out of her U/C i.e U/C-19.
 - 9- The appellant's appeal is not maintainable as no departmental appeal preferred and therefore liable to be set-aside on the following grounds amongst the others.

GROUND:

- A- Incorrect hence denied.

B- Incorrect and misconceived. The replying respondent belongs to U/C 19 and as per Regulatory Act, she cannot be posted out of her union council.

C- Not related to replying respondent. However, the appellant has rightly been posted by the competent authority.

D- Incorrect, hence denied in total.

E- Incorrect. The replying respondent was retained in the school because she was senior in that school whereas the school of the appellant was abolished and as such legally she cannot disturb the replying respondent. Secondly the respondent.3 retained in her own school due to security reasons as threat was circulated to the family member of the replying respondent by the concerned Deptt:

F- Incorrect hence denied.

G- Incorrect. The respondent No.1 has not passed the impugned order.


H- Incorrect and hence denied.

I- No comments.

It is therefore most humbly prayed that the appeal of the appellant may be dismissed with costs being not maintainable.

RESPONDENT NO.3

THROUGH:

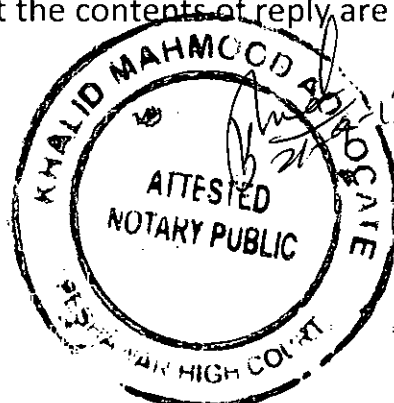


M.ASIF YOUSAFZAI

ADVOCATE.

AFFIDAVIT.

It is affirmed that the contents of reply are true and correct.



BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.

APPEAL NO. 596/2015

Nadra Parveen.

VS

Education Deptt:

REPLY TO APPLICATION ON BEHALF OF RESPONDENT NO. 3

(IRUM AMBREEN)

R.SHEWETH.

PRELIMINARY OBJECTIONS:

- 1- The appellant has no cause of action.
- 2- The appellant has no locus standi.
- 3- The appellant cannot ask for choice posting under section 10 of the Civil Servant Act, 1973 nor can ask as such under section 4-(b) of the Service Tribunal Act 1974.
- 4- The application is not maintainable under section 56(d) of the Specific relief act.

FACTS:

- 1- No comments.
- 2- The facts and grounds of the reply may also be considered as integral part of this reply and the appellant has not any prima facie case.
- 3- Incorrect hence denied.
- 4- Incorrect. The order of the Tribunal is fully acted upon.
- 5- Incorrect, hence denied.

It is therefore most humbly prayed that the application in hand may be dismissed with costs.

RESPONDENT NO.3

THROUGH:

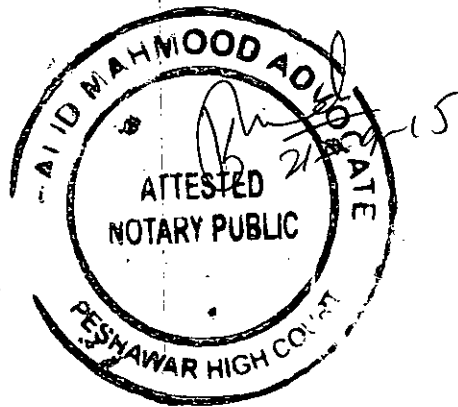


M.ASIF YOUSAFZAI

ADVOCATE.

AFFIDAVIT.

It is affirmed that the contents of reply to application are true and correct.



THE KHYBER PAKHTUNKHWA (APPOINTMENT, DEPUTATION, POSTING
AND TRANSFER OF TEACHERS, LECTURERS, INSTRUCTORS AND DOCTORS)
REGULATORY ACT, 2011

AN

ACT

to regulate by law appointments, postings and transfers of teachers
serving in primary, middle, secondary and higher secondary
schools, lecturers in colleges and instructors in technical institutions
and doctors in health facilities.

Preamble.---WHEREAS it is expedient to regulate by law appointments, postings and transfers at local level, of teachers serving in primary, middle, secondary and higher secondary schools, lecturers in colleges and instructors in technical institutions and doctors in health facilities and to ensure the availability of teachers in schools, lecturers in colleges and instructors in technical institutions and the doctors in health facilities, and to regulate deputation of doctors abroad, and to provide for matters connected therewith or ancillary thereto;

It is hereby enacted as follows:

1. Short title, application and commencement.---(1) This Act may be called the Khyber Pakhtunkhwa (Appointment, Deputation, Posting and Transfer of Teachers, Lecturers, Instructors and Doctors) Regulatory Act, 2011.

(2) It shall apply to teachers serving in primary, middle, secondary and higher secondary schools, lecturers in colleges as well as commerce colleges and instructors serving in technical institutions and doctors serving in the health facilities in the Province of the Khyber Pakhtunkhwa.

(3) It shall come into force at once.

2. Definitions.---(1) In this Act, unless the context otherwise requires, the following expressions shall have the meanings hereby respectively assigned to them that is to say,-

(a) "Commission" means the Khyber Pakhtunkhwa Public Service Commission;

(aa) "college" means a degree college;

(b) "doctor" means a doctor serving in the health facility;

(c) "Government" means the Government of the Khyber Pakhtunkhwa;

(d) "health facilities" mean all health facilities established and managed by Government to provide medical facilities to general public;

- (e) "lecturer" and "instructor" respectively means a lecturer or an instructor serving in a Technical Institution as well as in a college, as the case may be;
- (f) "prescribed" means prescribed by rules made under this Act;
- (g) "rules" mean the rules made under this Act;
- (h) "school" means school in the public sector including primary, middle, secondary school, higher secondary school or an institution of equivalent level imparting education through any system or medium of instruction in the public sector;
- (i) "teacher" means a teacher of primary, middle, secondary or higher secondary school; and
- (j) "technical institution" means and includes a Commerce College or Government College of Management Sciences or Technical Institute or Technical and Vocational Training Center or Skill Development Center in the public sector imparting technical education to students leading to the award of a degree or a diploma or a certificate.

(2) Words and phrases used in this Act, but not defined, shall have the same meanings as respectively assigned to them under the relevant federal law or provincial law or any other statutory order or rules for the time being in force.

3. Appointment, posting and transfer of primary school teachers.---(1) The vacancy of primary school teacher shall be filled in from the candidates belonging to the Union Council of their permanent residence mentioned in their Computerized National Identity Card and domicile, on merit and if no eligible candidate in that Union Council is available where the school is situate, such appointment shall be made on merit from amongst eligible candidates belonging to the adjacent Union Councils:

Provided that on availability of a vacancy, a primary school teacher, appointed from adjacent Union Council, as referred to in this sub-section, shall be transferred against a vacant post in a school of the Union Council of his residence within a period of fifteen days.

(2) Upon marriage, the primary school teacher on request may be transferred to the school in the Union Council, where his spouse, ordinarily resides, subject to the availability of vacancy.

(3) The primary school teacher shall be transferred to other school within the Union Council on completion of tenure as may be prescribed or before completion of tenure, subject to the policy of rationalization for maintaining certain students teachers ratio, if any.

(4) Government shall, within a period not exceeding one year of the commencement of this Act, make arrangement for posting of all the primary school

(29)

teachers appointed prior to coming into force of this Act, to the schools of their respective Union Councils or adjacent Union Councils, as the case may be.

4. Appointment of doctors, lecturers, instructors, subject specialists and teachers on adhoc basis.---(1) Government may, through the competent authorities make adhoc appointment on merit against the vacant posts of doctors, lecturers, instructors, subject specialists and teachers, falling within the purview of Commission, in a district concerned from the domicile holders of that district for a period of one year or till the arrival of recommendees of Commission, whichever is earlier after fulfilling the pre-requisites of giving wide publicity in the press. On assumption of charge of post by recommendee of the Commission, the services of such ad hoc appointee shall stand automatically terminated:

Provided that if no suitable and eligible candidate is available in the district concerned for appointment, then the candidates belonging to the neighbouring districts shall be considered for appointment in the order of their merit.

(2) Save as the appointment made under proviso of this section, "ad hoc appointee" shall serve in the district of his domicile.

(3) The post of a doctor, lecturer, instructor, subject specialist or teacher who proceeds on training or long leave may be treated as vacant post for the purpose of contract or contingent appointment till the return of such employee from training or long leave and assumption of charge of the post:

Provided that the period of such training or long leave shall not be less than one year and no appointment on contract or contingent shall be made on the post which may fall vacant for a period less than one year.

5. Initial posting. --- (1) The doctors, lecturers, instructors subject specialist or teachers, upon their appointment shall be first posted in the periphery of the zone against whose quota they have been recruited, and they shall not be transferred for a period of at least three years.

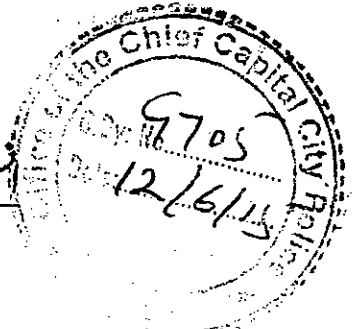
(2) Upon expiry of the tenure as referred to in sub-section (1), transfer shall be made only upon the availability of substitute.

6. Deputation of Doctors.---(1) Government may allow deputation abroad for all categories of doctors only once in their entire service, for a period not exceeding three years.

(2) Deputation to "Foreign Service" within Pakistan shall be permissible only in respect of medical officers for a period not exceeding three years:

Provided that no further extension, on expiry of agreed tenure shall be given to the doctors who are already on deputation abroad or within Pakistan.

7. Postgraduate Medical Education.---(1) The Health Department, on the basis of objective need assessment and analysis, shall determine the intake number of Trainee Medical Officers (TMOs) in Postgraduate Medical Institute (PGMI) and Junior Registrars in Tertiary Care Hospitals every year. This stipulated number shall not exceed in any case.
- (2) Any doctor selected or permitted for postgraduate medical training shall be treated on leave without pay and may be entitled only for stipend fixed by Government from time to time for such training.
- (3) A doctor selected or permitted for postgraduate medical training shall provide surety bond prescribed by Government ensuring that upon completion of his studies for which he was initially selected, shall compulsorily serve for three years in the district of his domicile and in case of non-availability of a post in the district of domicile, he shall serve for three years in the rural area.
- (4) For the purpose of sub-section (3), the doctor shall also provide guarantee of two government officers.
- (5) In case of violation of sub-section (3), Government shall serve one month notice upon the doctor for resumption of duty, failing which the amount shall be recovered from him or from the guarantor, as the case may be.
8. Provisions relating to doctors apply to lecturers and instructors. ---The provisions relating to doctors in section 7 of this Act shall mutatis mutandis apply to lecturers and instructors.
9. Act to over-ride other laws.---The provisions of this Act shall have effect notwithstanding any thing contained in any other law for the time being in force.
10. Jurisdiction barred.---Save as provided under the Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973), the Khyber Pakhtunkhwa Civil Servants (Appeal) Rules, 1986 and the Khyber Pakhtunkhwa Service Tribunal Act, 1974 (Khyber Pakhtunkhwa Act No. 1 of 1974), no order made or proceedings undertaken under this Act, or the rules made there under or any officer authorized by it shall be called into question in any Court, and no injunction shall be granted by any Court in respect of any decision made, or proceedings taken in pursuance or by any power conferred by or under this Act or the rules.
11. Removal of difficulties.---Government may, by order, provide for the removal of any difficulty which may arise in giving effect to the provisions of this Act.
12. Power to make rules.---Government may make rules for carrying out the purposes of this Act.



3421
No. 12/06/15
Date 12/06/15

انسپکٹر جنرل آف پولیس خیبر پختونخواہ کے خصوصی ہدایات

حال ہی میں رونما ہونے والے واقعات اور انٹیلی جنس رپورٹس سے یہ بات عیاں ہوتی ہے کہ دشمنوں نے پولیس اور دیگر سیکورٹی اداروں کے افسران کو نشانہ بنانے پر اپنی توجہ مرکوز کی ہے۔ لہذا انسپکٹر جنرل آف پولیس خیبر پختونخواہ نے ذیل ہدایات جاری کیں ہیں۔

- (i) تمام افسران موجود خطرہ سے ذاتی طور پر آگاہی حاصل کریں اور انکے ساتھ پہلے سے موجود حفاظتی انتظامات کے علاوہ مناسب حفاظتی اور احتیاطی تدابیر اختیار کریں۔
- (ii) اس بات کو ہر صورت میں یقینی بنانا کہ گھر سے دفتر جاتے وقت ایک ہی روٹ مسلسل استعمال نہ کریں۔
- (iii) اگر ایک ہی روٹ استعمال کرنا مجبوری ہو تو گھر سے نکلنے سے پہلے سفید پارچات میں کسی کو تعینات کریں تاکہ وہ باہر گئی اسٹریٹ کا مکمل معائنہ کرے مشکوک افراد پر نظر رکھیں۔
- (iv) یہ ہدایات تمام اہلکاروں کیلئے ہیں۔

محمد طاہر خان داوڑ
DSP آپریشن

برائے انسپکٹر جنرل آف پولیس خیبر پختونخواہ

All Sst
SP Security
For N/A action

No. 12358-60/OS (ops)

Dated 12-06-15

نوٹ:- یہ ہدایات دن میں تین بار 10 دن کیلئے بذریعہ وائرس تمام اضلاع کو سنانا ہے۔

SP/OPS, Investigation & Traffic

Comdt - CPC

SP, Hqs -

Concurs to all returned for
strict compliance in

Seen/All DSP of sec unit

For compliance as directed

SP/Security

1

(1)

DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR.

OFFICE ORDER:-

Consequent upon the recommendation of Departmental Promotion Committee and in pursuance of the Govt. of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No. SO (B&A) 1-16/E&SE/2008 dated 12/10/2012 and No. SO(PE) 4-5/SSRC/Meeting/ 2012/ Teaching Cadre dated 13/11/2013 the following Primary School Teachers BPS.12 are hereby promoted to the post of Primary School Head Teacher: (PSHT) BPS.15 plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with immediate effect in schools noted against their names

S#	Seniority No.	Name of Circle	Teacher name	Name of School	Posted at
1	2	H/ ABAD	KHATOON BEGUM	GGPS NO.1.BARA LINE	GGPS NO.1.BARA LINE
	7	CITY	ABIDA YASMEEN	GGPS FAISAL COLONY NO.1	GGPS FAISAL COLONY NO.1
3	8	CITY	TASLEEM BEGUM	GGPS FAISAL COLONY NO.2	GGPS FAISAL COLONY NO.2
4	15	CITY	FATIMA BEGUM	GGPS DEEN BAHAR COLONY NO.2	GGPS Kandi Marozai No.1
5	16	DAUDZAI	NUSRAT BEGUM	GGPS TODA	GGPS TODA
6	19	CITY	JAVIDA AKHTAR	GGPS ZARYAB COLONY NO.1	GGPS ZARYAB COLONY NO.1
	28	CANTT:	MUMFAZ SHAHEEN	GGPS DABGARI BANAT	GGPS DABGARI BANAT
8	33	CITY	ZARINA FAYAZ	GGPS IJAZ ABAD SHAHEEN MUSLIM TOWN	GGPS Suleman Khel
9	34	CITY	NAZMA TAUQEER	GGPS JOGIWARA NO.1	GGPS JOGIWARA NO.1
10	43	CITY	SHAHNAZ AKHTAR	GGPS QAID ABAD NO.2	GGPS QAID ABAD NO.2
11	45	City	Nusrat Shaheen	GGPS Gear Gatri No.2	GGPS Gear Gatri No.2
12	50	H/ ABAD	SURRIYA BANO	GGPS ISLAMIA COLLEGE	GGPS ISLAMIA COLLEGE
13	73	CITY	TARA JABEEN	GGPS SARBILAND PURA	GGPS SARBILAND PURA
14	90	CANTT:	ZARINA SARFARAZ	GGPS GULSHAN REHMAN	GGPS GULSHAN REHMAN
15	94	CITY	SAJIDA BIBI	GGPS SIRKI GATE	GGPS Mian Jee Baba
16	96	H/ ABAD	JAMILA BANO	GGPS NO.1.BARA LINE	GGPS Nodeh Payan
17	98	H/ ABAD	NAJMA FIRDOS	GGPS BADEZAI	GGPS BADEZAI
18	99	CITY	NIGHAT RAHANA	GGPS ZARYAB COLONY NO.2	GGPS ZARYAB COLONY NO.2
19	104	CITY	SALMA KOUSAR	GGPS ZARGAR ABAD	GGPS Maryam zai
20	113	CITY	NUSRAT ANSARI	GGPS SHAH DAND	GGPS SHAH DAND
21	114	CANTT:	TABASSUM RUKHSANA	GGPS ACHAR 1	GGPS ACHAR 1
22	116	CANTT:	RUKHSANA ABASS	GGPS SATTAR SHAH	GGPS Achar No.2
23	118	CITY	BUSHRA NIGHAT	GGPS GULBAHAR NO.2	GGPS GULBAHAR NO.2
24	129	DAUDZAI	NIYYAR SULTANA	GGPS SHAH ALAM	GGPS SHAH ALAM
25	130	CITY	SHAMIM AKHTAR	GGPS AKHOON ABAD	GGPS AKHOON ABAD
26	134	CITY	NIGAHAT YASMEEN	GGPS SHAIKH ABAD	GGPS SHAIKH ABAD
27	136	CANTT:	NASIRA BIBI	GGPS ASIA PARK	GGPS ASIA PARK
28	137	CANTT:	TAHIRA PERVEEN	GGPS IRRIGATION COLONY	GGPS IRRIGATION COLONY
29	139	C/PURA	ROBINA NAZLI	GGPS Yousaf khel	GGPS Yousaf khel
30	147	CITY	NAVEEDA BANO	GGPS WAZIR BAGH NO.1	GGPS WAZIR BAGH NO.1
31	148	H/ ABAD	SHAHIDA PARVEEN	KOTLA MOHSIN KHAN	GGPS Shaheen Abad
32	149	CITY	REHANA DAUD	GGPS SHAH DAND	GGPS Sufaid Sung
33	150	CITY	ROMANA BASHIR	GGPS Jewan Mahal	GGPS Jewan Mahal
34	151	CITY	IMRANA TAUQEER	GGPS DALAZAK ROAD	GGPS DALAZAK ROAD
35	155	CITY	SAHIB SULTAN	GGPS HAIDAR COLONY	GGPS HAIDAR COLONY
36	156	CITY	NASIM AKHTAR	GGPS AFGHAN COLONY NO.1	GGPS AFGHAN COLONY NO.1
37	157	CITY	RIFAT JEHAN ARA	GGPS GUL ABAD PESHAWAR	GGPS GUL ABAD PESHAWAR

S/II	Seniority No.	Name of Circle	Teacher name	Name of School	Posted at
214	479	CITY	AZRA BEGUM	GGPS AKHOON ABAD	GGPS Namdar Khan Karoona
215	481	CITY	BUSHRA BIBI	GGPS GOAR GATHRI NO.2	GGPS Tor Kanay
216	484	CITY	FARAH YOUNIS	GGPS KAKSHAL NO.1 QUAID ABAD	GGPS Ayaz Karoona
217	485	CITY	SUMAIRA ALI	GGPS GUL ABAD PESHAWAR	GGPS Bela Barmad Khel No2
218	488	H/ ABAD	SAEEDA BEGUM	DANISH ABAD	GGPS Palosi Talarzai
219	489	C/Pura	NAFEESA BANO	GGPS SARDAR GARHI	GGPS SARDAR GARHI
220	490	CANTT:	GUL E RANA	GGPS LANDI ARBAB 1	GGPS Mera Sheikhan
221	491	CITY	FARZANA BEGUM	GGPS AFGHAN COLONY NO.1	GGPS Muslim Abad
222	492	CANTT:	RIZWANA NAHEED	GGPS CANTT NO 1	GGPS Syed-Ena-Zcnab
223	493	C/PURA	SAEEDA AMAN	GGPS CHAMKANI NO.3	GGPS Masma
224	494	CITY	ZAKIA AMAN	GGPS Rasheed Abad	GGPS Rasheed Abad
225	495	CITY	SHABANA ROHI	GGPS SHAIKH ABAD	GGPS Khawaja Mir Killay
226	495	CITY	IRUM AMBAREEN	GGPS OLD KARIM PURA	GGPS OLD KARIM PURA
227	497	H/ ABAD	RUKHSANA BEGUM	GGPS NO.1.HAYATABAD	GGPS Achini No.1
228	498	CITY	SHAZIA SHAMS	GGPS AFGHAN COLONY NO.3	GGPS Niami
229	501	H/ ABAD	Robeeca	GGPS FOREST COLLEGE	GGPS Palosi Piraan
230	502	CITY	SAIRA WAZIR	GGPS ZARYAB COLONY NO.1	GGPS Melogan
231	503	H/ ABAD	MUSRRAT IMRAN	GGPS NO.3.TEKKAL BALA	GGPS Mula Zai
232	507	CITY	FARZANA YASMEEN	GGPS ZARGAR ABAD	GGPS Adezal No.1
233	508	CITY	SHAZIA AMBAREEN	GGPS GULBAHAR NO.2	GGPS Talam Khan Killi
234	512	CANTT:	SHAHNAZ BEGUM	GGPS SWATI GATE	GGPS Charkha Khel
235	515	C/Pura	SAMINA SADAQAT	GGPS WADPAGGA	GGPS WADPAGGA
236	516	C/Pura	SHOUKAT PERVEEN	GGPS JAGRA MALOGGI	GGPS No.2 Mera Kachori
237	520	CANTT:	ASMAT JEHAN	GGPS PAJAGGI	GGPS PAJAGGI
238	522	CITY	TAYYABA SIDDIQI	GGPS SARBILAND PURA	GGPS Karyana
239	523	CITY	RUKHSANA SHAHEEN	GGPS MOHALLA ISLAM ABAD	GGPS Sama Badaber
240	524	CANTT:	KALSOOM BEGUM	GGPS DABGARI BANAAT	GGPS Nakband
241	525	CANTT:	NAZIA BEGUM	GGPS GARHI QAMAR DIN	GGPS Garhi Fazal Rahim
242	528	DAUDZAI	RUKHSANA BUKHARI	GGPS KUKAR	GGPS KUKAR
243	532	C/Pura	WAHIDA NAZ	GGPS Chamkani No.1	GGPS Tember Pura
244	533	DAUDZAI	NOOR-UL- HAYA	GGPS DAMAN AFGHANI	GGPS DAMAN AFGHANI
245	536	H/ ABAD	SHAKEELA GUL	GGPS NO.2.POLICE COLONY	GGPS Regi No.1
246	537	CITY	RUKHSANA YASMEEN	GGPS GOAR GATHRI NO.2	GGPS Badaber Maryamzai
247	538	H/ ABAD	HAYAT UN NAFS	FOREST COLLEGE	GGPS Forest College
248	539	C/Pura	RASHIDA BEGUM	GGPS Duran Pur	GGPS Budni
249	541	CANTT:	JAMSHADA	GGPS GULSHAN REHMAN	GGPS Khalozai Adezal
250	543	BADABER	FARIDA BEGUM	GGPS SHIEKH MUHAMADI NO.1	GGPS SHIEKH MUHAMADI NO.2
251	544	CANTT:	SHAZIA BANO	GGPS CANTT NO 1	GGPS Passani Payan
252	545	CANTT:	SHAHEEN BEGUM	GGPS ATTA MUHAMMAD	GGPS Kagawala Sharif Abad
253	546	CANTT:	SHAHNAZ GUL	GGPS ASIA PARK	GGPS Passani Bala
254	547	MATHRA	ZAKIA MENHAS	GGPS HASSAN ABAD	GGPS HASSAN ABAD
255	551	BADABER	TASLEEM BEGUM	GGPS BAZID KHEL NO.3	GGPS BAZID KHEL NO.3
256	553	C/Pura	NIGHAT NAZNEEN	GGPS NO.3 CHAMKANI	GGPS No.1 Banda Kachori

S#	Seniority No.	Name of Circle	Teacher name	Name of School	Posted at
342	663	CITY	MUSSARAT MUNIR	GGPS KAKSHAL NO.1: QUAID ABAD	GGPS Behlol Zai
343	665	CITY	SHABANA NOREEN	GGPS AFGHAN COLONY NO.2	GGPS Jogani
344	669	CITY	RIFAQAT SULTAN	GGPS Din Bahar No.1	GGPS Afghan Colony No.3

TERMS & CONDITIONS :-

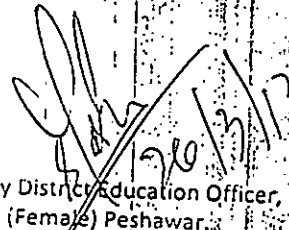
1. They would be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulation as may be issued from time to time by the Govt.
3. Their service can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be proceeded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their inter-see seniority on lower post will remain intact.
6. No TA / DA is allowed for joining his duty.
7. They will give an under taking to this effect to be recorded in their service books.
8. Necessary entry to this effect should be made in their service books.

SOFIA TABASSUM
District Education Officer
(Female) Peshawar.

Endst: No. 11662-67 / Promotion PSHT(F) / Adj / Dated Peshawar the 26/3 / 2013 ✓

Copy for information to the :-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
3. Sub Divisional Education Officer (Female) Peshawar.
4. ASDEO (Female) circles concerned.
5. Supdt: Local Office.
6. Officials Concerned.


Deputy District Education Officer,
(Female) Peshawar.



OFFICE OF THE MINISTER FOR
COMMUNICATION & WORKS ✓
KHYBER PAKHTUNKHWA

5

01/10/16

DEO (F),

Peshawar.

Madam. A.O.A.

Mst Nadia Parveen is personally known to me. Please transfer from Grps old Kotim puda to Grps Jalabala as per rule & policy may be cancelled immediately.

Truly

ARIF YOUSAF
ADVOCATE

MPA-PK4-KPK

Address: Communication & Works Secretariat, Police Line Road, Civil Secretariat, Peshawar.
Phone (Office) 091-9211125 Fax: 091-9213374

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR

OFFICE ORDER

6

Consequent upon approval by the competent authority, the following PSHT are hereby ordered on their own pay and BPS against the Schools mentioned against each name in the interest of public service with effect.

S. No	Name of Teacher	From	To	Remarks
1.	Mst: Irum Ambareen PSHT	GGPS Jala Bela	GGPS Old Karimpura	V.S.No.2
2.	Mst: Nadra Parveen PSHT	GGPS Old Karimpura	GGPS Jala Bela	V.S.No.1

Note:- No TA/DA etc is allowed.
Charge report should be submitted to all concerned.

(SAMINA GHANI)
DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR.

Endst: No. 7118-22 dated 12/04/2014.

Copy forwarded to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. SDEO(Female) Peshawar.
3. ASDEO Circle Concerned as desired.
4. Head Teachers concerned.
5. Teachers concerned.

S. Ghani
DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR

S No (2) may be retain
at GGPS Old Karim Pura has
recommended by Minister Minrud. KP.

S. Ghani
Private Secretary To Minister for
Elementary & Secondary Education
Khyber Pakhtunkhwa

12/4/12
ZIA ULLAH
Minister
For General Devel.
Khyber Pakhtunkhwa



CHIEF MINISTER'S SECRETARIAT
KHYBER PAKHTUNKHWA
PESHAWAR

7

No.SO-1/CMS/KPK/3-15/2014 /5050
Dated: 18-04-2014.

To

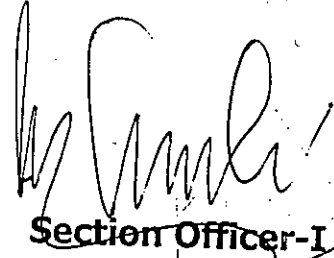
The District Education Officer (Female),
Elementary & Secondary Education Department,
Peshawar.

Subject: **CANCELLATION OF TRANSFER ORDER**

Memo:

I am directed to enclose herewith a copy of self-explanatory application of Ms. Nadra Parveen, PSHT, GGPS, Old Karimpura under transfer to Jalabaial for necessary action as per rules/policy under intimation to this Secretariat please.

Encls: As above.


Section Officer-I

Ends: No and Date Even

Copy forwarded to the:-

PS to Principal Secretary to the Chief Minister, Khyber Pakhtunkhwa.

Section Officer-I

748
22/4/14.

گورنمنٹ ہسپتال، کوئٹہ، خیبر پختونخوا

8

عنا - عامہ

گزارش ہے کہ سائیدہ کی طبیعت بہتر ہے

March 14th Retinalization Policy سے گورنمنٹ ہسپتال، کوئٹہ اور گورنمنٹ ہسپتال، پشاور

میں پوسٹل سروس کے تحت روکنے اور قانون کے مطابق ہے۔ جبکہ اس کے نتیجے میں

PSMF جو کہ اس سے متعلقہ ہو، گورنمنٹ ہسپتال، کوئٹہ اور گورنمنٹ ہسپتال، پشاور

14-4-14 کو پوسٹل سروس کے تحت ہے۔ تاہم اس کے بارے میں

سائیدہ کو جان بیدار کرنا اور اس کے بارے میں جاننا ضروری ہے۔

پوسٹل سروس کے تحت ہے۔ جو کہ صرف طالبان کی طرف سے ہے۔

تا انسانی اور قانون کے تحت ہے۔

اس کے بارے میں ہے۔ کہ اور ان کے قانون کو مدنظر رکھتے

ہوئے۔ سائیدہ کو اس کے بارے میں جاننا ضروری ہے۔

گورنمنٹ ہسپتال، کوئٹہ اور گورنمنٹ ہسپتال، پشاور میں ہے۔

موجودہ صورت کے تحت ہے۔ کہ ان کے قانون کے

تحت ہے اور ان کے بارے میں ہے۔

الغرض

تاریخ 14 مارچ

گورنمنٹ ہسپتال، کوئٹہ اور گورنمنٹ ہسپتال، پشاور

Dr. F. Khan

retina account

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keating

Mr. Shaukat Ali yousafzai
Minister of Health,
Khyber Pakhtunkhwa.



OFFICE OF THE MINISTER FOR HEALTH,
KHYBER PAKHTUNKHWA.

9

No. PS/MIN/Health/KP
Dated Peshawar the April 15, 2014

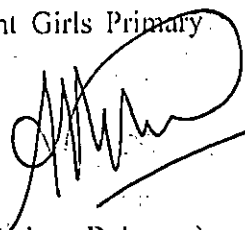
To

The District Education Officer (Female)
Peshawar.

Subject: TRNASFER/POSTING

I am directed to refer to the subject noted above and to state that Mst.Nadra Parveen, PSHT Elementary & Secondary Education Department and presently working at Government Girls Primary School Old Karimpura and has been transferred to Govrnment Girls Primary School, Jala Bela. She belongs to the constituency of the Honourable Minister for Health, Khyber Pakhtunkhwa (PK-02).

2. Honourable Minister for Health, Khyber Pakhtunkha has been pleased to desire that the transfer order in respect of Mst.Nadra Parveen, PSHT to Government Girls Primary School, Jala Bela may be cancelled and she may be retained at Government Girls Primary School Old Karimpura in the public interest.


(Azizur Rehman)
Private Secretary

Khyber Pakhtunkhwa

15/11/1997

Handwritten note

ATTA UR RHMANKI
 PSORHOOCHIEF MINISTER
 KHAYBER PAKHTUNKHWA
 call
 50/11
 Ministers pt.
 Mr. Shaukat Ali Jousafzai
 Minister of Health,
 Khayber Pakhtunkhwa
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 PEGFI para

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Handwritten notes in Urdu, including "1997" and "15/11/1997".

10

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OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR.

OFFICE ORDER.

Consequent upon approval by the competent authority, the following PSHT are hereby ordered on their own pay and BPS against the Schools mentioned against each name in the interest of public service with effect.

S. No	Name of Teacher	From	To	Remarks
1.	Mst: Irum Ambareen PSHT	GGPS Jala Bela	GGPS Old Karimpura	V.S.No.2
2.	Mst: Nadra Parveen PSHT	GGPS Old Karimpura	GGPS Jala Bela	V.S.No.1

Note:- No TA/DA etc is allowed.
Charge report should be submitted to all concerned.

(SAMINA GHANI)
DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR.

Endst: No. 7118-22 dated 12/04/2014.

Copy forwarded to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. SDEO(Female) Peshawar.
3. ASDEO Circle Concerned as desired.
4. Head Teachers concerned.
5. Teachers concerned.

S Ghani
DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR

Pls look into the matter
ag per policy.

ZIA ULLAH AFRIDI
Minister
For Mineral Development
Khyber Pakhtunkhwa

(12)

جملہ AGOs پشاور

THREAT ALERT

Dy: No. 1779	PA-CCPO
Di: 25.4.14	
Sheet: -	

124 پر مل، معلومات کے مطابق شریپندوں کے خلاف FATA میں ہونے والے فضائی حملوں کے عمل کے طور پر TTG نے سرکاری ملازمین (خاص کر LEAs، FC اور Police) اور ان کے اہل خانہ کو نشانہ بنانے کی منصوبہ بندی کر رکھی ہے۔

لہذا آپ کو ہدایت کی جاتی ہے کہ اس سلسلے میں مقامی پولیس، انتظامیہ سے رابطہ میں رہیں اور اپنا سورس استعمال کر کے اس سلسلے میں پیشگی معلومات اکٹھا کر کے پولیس، انتظامیہ اور سیشن برانچ ہیڈ کو رپورٹ کو بروقت اطلاع دیں۔

برائے ایڈیشنل انسپکٹر جنرل آف پولیس
سیشن برانچ خیبر پختونخوا پشاور۔

24.04.2014 مورخہ

نمبر 31-17730/پی.بی.

- Copy for information to:-
1. Provincial Police Officer, Khyber Pakhtunkhwa.
 2. Capital City Police Officer, Peshawar.

IMP

SP/SPS

Maximum vigilance and alertness is required to be exercised.

Received
95

Handwritten notes and signatures at the bottom left of the page, including some illegible text and a signature.

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR.

13

OFFICE ORDER :-

In pursuance of the orders conveyed vide Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar letter No.6104-59/Rationalization/Estab: dated 01/04/2014 para No.7, the following Govt: Girls Primary Schools functioning in one premises with various title of school are merged with the school already functioning proper title with effect from 1/4/2014.

The senior most PSHT of the schools shown in column No. 6 will be act as a PSHT of the resultant school. The title of other schools stand abolished.

All the relevant record i.e, students attendance register, Teachers attendance, PTC registers etc: will be maintained by the PSHT of the host school..

S. No.	Name of Host school in which the schools given in Column No. 4 are to be merged.	school code	Name of schools to be merged with the school in Column: 2	School Code	Name of Teacher to act as PSHT in the host school.
1	2	3	4	5	6
1	GGPS Islamai College Peshawar	21276	GGPS Danish Abad	21242	Mst: Surrayya Begum
2	GGPS Hayat Abad No. 1 Peshawar	21267	GGPS Hayat Abad No.2	21268	Mst. Waheeda Begum
3	GGPS Hayat Abad No. 3 Peshawar	21269	GGPS Hayat Abad No. 4	32847	Mst. Najma Shaheen
4	GGPS Regi No 1 Peshawar	21497	GGPS Regi No 3	21499	Mst. Shakeela
5	GGPS Regi Lalma No 2 Peshawar	32999	GGPS Regi Lalma No.3	32999	Mst. Mussarat Begum
6	GGPS Shaheed Abad Peshawar	32859	GGPS Kotla Mohsin Khan	32844	Mst. Shahida Begum
7	GGPS Sangu No 1 Peshawar	21804	GGPS Sangu No 2	21503	Mst. Rubina
8	GGPS Sarband No 2 Peshawar	21529	GGPS sarband No 3	21507	Mst. Nafeesa Khatoon
9	GGPS Police Colony 1 Peshawar	21299	GGPS Police Colony	21300	Mst. Farrukh Naz
10	GGPS Dhaki Munawar Shah Pesh	21248	GGPS Andar Sher	21232	Mst. Shaheen Bano (Disable)
11	GGPS Gorgatri No 2 Peshawar	21258	GGPS yakatoot	21316	Mst. Nusrat Shaheen (Widow)
12	GGPS Jogiwar No2 Peshawar	21281	GGPS Jogiwar No1	21280	Mst. Nazma Toqeer
			GGPS Jogiwar No3	21282	
13	GGPS GulBad shah Jee	21260	GGPS Sara Kala Khan	21278	Mst. Shaheen Akhtar
14	GGPS Mohamand Abad Peshawar	21290	GGPS WazirBagh No.2	21314	Mst. Waheeda
15	GGPS Saeed Abad Peshawar	21306	GGPS Din Bahar No.1	21243	Mst. Shiraz Begum
16	GGPS Hazar Khawani 2 Peshawar	21272	GGPS HazarK hawani No.3	100074	Mst. Dilshad Begum
17	GGPS GulBahar No.3 Peshawar	21263	GGPS Gulbahar No.1	21261	Mst. GulNaz
			GGPS Gulbahar No.4	32850	
18	GGPS Shah Jee Abad Peshawar	32859	GGPS Nanak Pura	21291	Mst. Javida Akhtar
			GGPS Faqir Abad	21251	
			GGPS Zaryab Colony No.1	21317	

No.	Name of Host school in which the schools given in Column No. 4 are to be merged.	school code	Name of schools to be merged with the school in Column: 2	School Code	Name of Teacher to act as PSHT in the host school.
19	GGPS Faisal Colony No.2 Peshawar	21249	GGPS Faisal Colony No.1 Peshawar	21250	Mst. Tasleem Begum
20	GGPS Afghan Colony No.2 Peshawar	21228	GGPS Afghan Colony No.1 Peshawar	21227	Mst. Naseem Akhtar
			GGPS Afghan Colony No.3 Peshawar	21229	
21	GGPS Mohallah Islam Abad Peshawar	21289	GGPS Nishtar Abad Peshawar	21292	Mst. Zeenat Saba
22	GGPS Zaryab Colony No.2 Peshawar	21318	GGPS Dalazak Road Peshawar	21241	Mst. Nighat Rehanna
23	GGPS Old Karim Pura Peshawar	21296	GGPS Gorgathri No.1 Peshawar	21257	Mst. Nadra Parveen
24	GGPS No.1 Muhammadzai Peshawar	21462	GGPS Muhammad Zai No.2 Peshawar	21463	Mst. Hameeda Bano
25	GGPS No.1 ChohaGujar Peshawar	21366	GGPS ChohaGujar No.2 Peshawar	32854	Mst. Munira Iqbal
26	GGCMS Phandu Gharif Abad Peshawar	32853	GGPS PhanduBala Peshawar	2148	Already working SST
27	GGPS Civil Quarter Peshawar	21239	GGPS Dehri Baghbanan Peshawar	21247	Mst. Imtiaz Begum
28	GGPS Railway Quarter Peshawar	212304	GGPS Railway Quarter No.2 Peshawar	21303	Mst. Nasim Akhtar
29	GGPS Nothia Qadeem Peshawar	21295	GGPS NothiaJadeed No.2 Peshawar	21294	Mst. Farhat Bibi
30	GGPS Deh Bahadar No.1 Peshawar	32871	GGPS Deh Bahadar No.2 Peshawar	21245	Mst. Shakila Akhtar
31	GGPS Bhatian Peshawar	21340	GGPS Garhi Abdul Samad Peshawar	21382	Mst. Kousar Jehan
32	GGPS Bazid Khel No.3 Peshawar	21351	GGPS Bazid Khel No.1 Peshawar	21349	Mst. Tasleem Begum
33	GGPS Cantt: No.3 Peshawar	21237	GGPS Cantt: No.1 Peshawar	21236	Mst. Humera Nargis
34	GGCMS Bara Sheikhan Peshawar	32869	GGPS Bara Sheikhan Peshawar	21347	Already working SST

District Education Officer,
(Female) Peshawar.

Endst: No. **6782-96** /F.No. ___/Merged School GGPS/P&D Dated Peshawar the **5th** of April, /2014

Copy forwarded for information and strict compliance to the :-

1. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Accountant General Khyber Pakhtunkhwa Peshawar.
3. SDEO (Female) Peshawar with the remarks that feasible proposal of surplus staff of the above schools according to existing rules and policy should be furnished for adjustment in the required schools on need basis within two days positively.
4. Deputy Director EMIS Cell with the request to delete the schools mentioned in column No. 4 from data
5. All the ASDEO (Female) District Peshawar.
6. ADEO (Female) Establishment Primary Local Office.

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR.

15

OFFICE ORDER :-

In supersession of this office order issued under Endst: No.6782-96 dated 5/4/2014 and in pursuance of the orders conveyed vide Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar letter No.6104-59/Rationalization/Estab: dated 01/04/2014 para No.7, the following Govt: Girls Primary Schools functioning in one premises with various title of school are merged with the school already functioning proper title with effect from 1/4/2014.

The senior most PSHT of the schools shown in column No. 6 will be act as a PSHT of the resultant school. The title of other schools stand abolished.

All the relevant record i.e, students attendance register, Teachers attendance, PIC registers etc: will be maintained by the PSHT of the host school. No Creation / abolition of post is involved.

S. No.	Name of Host school in which the schools given in Column No. 4 are to be merged.	school code	Name of schools to be merged with the school in Column: 2	School Code	Name of Teacher to act as PSHT in the host (Resultant) school.
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10	GGPS Dhaki Munawar Shah Pesh	21248	GGPS Andar Sher	21232	Mst. Shaheen Bano (Disable)
11	GGPS Gorgatri No 2 Peshawar	21258	GGPS yakatoot	21316	Mst. Nusrat Shaheen (Widow)
12	GGPS Jogiwar No2 Peshawar	21281	GGPS Jogiwara No1	21280	Mst. Nazina Inqee
			GGPS Jogiwara No3	21282	
13	GGPS GulBad shah Jee	21260	GGPS Sara Kala Khan	21278	Mst. Shaheen Akhtar
14	GGPS Mohamand Abad Peshawar	21290	GGPS WazirBagh No.2	21314	Mst. Waheeda
15	GGPS Saeed Abad Peshawar	21306	GGPS Din Bahar No.1	21243	Mst. Shiraz Begum
16	GGPS Hazar Khawani 2 Peshawar	21272	GGPS HazarK hawani No.3	100074	Mst. Dilshad Begum
17	GGPS GulBahar No.3 Peshawar	21263	GGPS Gulbahar No.1	21261	Mst. Gulnaz
			GGPS Gulbahar No.4	32850	
18	GGPS Shah Jee Abad Peshawar	32859	GGPS Nanak Pura	21291	Mst. Javida Akhtar
			GGPS Faqir Abad	21251	
			GGPS Zaryab Colony No.1	21317	

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20	GGPS Afghan Colony No.2 Peshawar	21228	GGPS Afghan Colony No.1 Peshawar	21227	Mst. Naseem Akhtar
			GGPS Afghan Colony No.3 Peshawar	21229	
21	GGPS Mohallah Islam Abad Peshawar	21289	GGPS Nishtar Abad Peshawar	21292	Mst. Zeenat Saba
22	GGPS Zaryab Colony No.2 Peshawar	21318	GGPS Dalazak Road Peshawar	21241	Mst. Nighat Behauna
23	GGPS Old Karim Pura Peshawar	21296	GGPS Gorgathri No.1 Peshawar	21257	Mst. Nadia Parveen
24	GGPS No.1 Muhammadzai Peshawar	21462	GGPS Muhammad Zai No.2 Peshawar	21463	Mst. Hamoeda Bano
25	GGPS No.1 ChohaGujar Peshawar	21366	GGPS ChohaGujar No.2 Peshawar	32854	Mst. Munira Iqbal
26	GGCMS Phandu Gharif Abad Peshawar	32853	GGPS PhanduBala Peshawar	2148	Already working SST
27	GGPS Civil Quarter Peshawar	21239	GGPS Dehri Baghbanan Peshawar	21247	Mst. Intiaz Begum
28	GGPS Railway Quarter Peshawar	212304	GGPS Railway Quarter No.2 Peshawar	21303	Mst. Nasim Akhtar
29	GGPS Nothia Qadeem Peshawar	21295	GGPS NothiaJadeed No.2 Peshawar	21294	Mst. Farhat Bibi
30	GGPS Deh Bahadar No.1 Peshawar	32871	GGPS Deh Bahadar No.2 Peshawar	21245	Mst. Shakila Akhtar
31	GGPS Bhatian Peshawar	21340	GGPS Garhi Abdul Samad Peshawar	21382	Mst. Kousar Jehan
32	GGPS Bazid Khel No.3 Peshawar	21351	GGPS Bazid Khel No.1 Peshawar	21349	Mst. Tasleem Begum
33	GGPS Cantt. No.3 Peshawar	21237	GGPS Cantt. No.1 Peshawar	21236	Mst. Humera Haggis
34	GGCMS Bara Sheikhan Peshawar	32869	GGPS Bara Sheikhan Peshawar	21347	Already working SST
35	GGPS Wazir Bagh No.1 Peshawar	2313	GGPS Wazir Bagh No.3 Peshawar	21315	Mst. Naveeda Bano

16

District Education Officer,
(Female) Peshawar.

Endst: No. 6901-51 / F.No. ___ / Merged School GGPS/P&D Dated Peshawar the 9th of April, /2014

Copy forwarded for information and strict compliance to the :-

1. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Accountant General Khyber Pakhtunkhwa Peshawar.
3. SDEO (Female) Peshawar with the remarks that feasible proposal of surplus staff of the above schools according to existing rules and policy should be furnished for adjustment in the required schools on need basis within two days positively.
4. Deputy Director EMIS Cell with the request to delete the schools mentioned in column No. 4 from data
5. All the ASDEO (Female) District Peshawar.
6. ADEO (Female) Establishment Primary Local Office.
7. ADEO P&D Local Office.

CS

17

**The District Education Officer (Female),
District Peshawar.**

Her Excellency!

I would like to draw your kind attention toward my professional activities that the undersigned presently an employ of Police Force and serving as SP/Security in Capital City Police Peshawar.

The spouse of the undersigned is an educator and presently serving/posted as Head-preceptor at Primary Girls School Old Karimpura.

As it is aware and there is no hidden issue regarding security and law and order situation across the province and especially this metrop olitan of KPK, alarming situation of security is extremely hovering and we (Police personnel/officers) standing like a rock before the challenges hurling by the miscreants/insurgents.

Keeping in view the above para No. 3 as discussed we especially law enforcers are bound to lead the life with tactics of security/safeguard alongwith offspring. It came to light that in next couple of days transfer/posting amongst the educators/head of its learning institutes etc run by the Provincial Government are expected take place or likely to reshuffle.

With the view of security issue it is declared that the same place of posting of my spouse Iram Ambareen i.e Primary Girls School Old Karimpura is quite appropriate from all respect as she is secured and under protection.

Your good self is requested that she may not be pulled out from her place of posting for the purpose of transfer/posting else where.

Thanking you and assuring you of my best cooperation at all times.



(JEHANZEB KHAN)

SUPERINTENDENT OF POLICE SECURITY

CAPITAL CITY POLICE PESHAWAR

Office Ph: No. 091-9212587

Cell No. 0333-9158005

4/12

The District Education Officer (Female),
District Peshawar.

18

15- Cards

Subject: REGRET FOR PROMOTION FOR BPS-16.

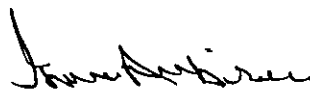
Her Excellency!

I would like to draw your kind attention that currently I am serving and posted at old Karimpura Primary School Peshawar City.

As it is aware and there is no hidden issue regarding security and law and order situation across the province and especially this metropolitan of KPK, alarming situation of security is extremely hovering and my spouse (Police officer) standing like a rock before the challenges hurling by the miscreants/insurgents. He is serving as SP Security in Capital City Police Peshawar.

Keeping in view as discussed, the undersigned is fully unwilling to get promotion in BPS-16 due to mentioned above reasons. For the time being it is regretted by the undersigned and presented the option forgo in connection for further promotion.

Thanking you and assuring you of my best cooperation at all times.

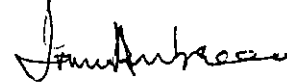

(HEADMISS/ERUM AMBAREEN)
Old Karimpura Primary School
Peshawar City

12/14

CHARGE ASSUMPTION REPORT.

19

In pursuance of the Distt: Education officer (F) Peshawar, vide office order No. 77118-22 dated 12.04.2014 I Mst: Iram Ambareen PSHT do here by assume the charge of Head Mistress GGP old Karim Pura Peshawar on 14.04.2014.



(Iram Ambareen)
PSHT GGP
Old Karimpura
Peshawar City,

Copy forwarded to the:-

1. Accountant General KPK Peshawar.
2. SDEO (Female) Peshawar.
3. ASDEO Circle City.

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.

APPEAL NO. 596/2015

Nadra Parveen.

VS.

Education Deptt.

REPLY ON BEHALF OF RESPONDENT NO. 3

(IRUM AMBREEN)

R.SHEWETH.

PRELIMINARY OBJECTIONS;

- 1- The appellant has no cause of action.
- 2- The appellant has no locus standi.
- 3- The appellant cannot ask for choice posting under section 10 of the Civil Servant Act, 1973 nor can ask as such under section 4-(b) of the Service Tribunal Act 1974.
- 4- That the replying respondent also belongs to U/C-19.
- 5- The appeal in hand is not entertainable being made without preferring departmental appeal.
- 6- The appeal is bad for non joinder of necessary parties, especially Govt: and secretary Education.
- 7- The appeal in hand is also bad for non impleadment of Dy: Director against whose order appeal is preferred.
- 8- The appellant is estopped due to her own conduct to institute the present appeal.
- 9- The appellant's school has been abolished; therefore, principally she is liable to be transferred.

FACTS:

- 1- Incorrect and misconceived. The appellant's school was abolished and therefore, she should be transferred rather to disturb the replying respondent.

- 2- Incorrect and misconceived. As per policy of the education Deptt; senior most of the school is to be retained in the school and not the new comer. More over there were serious threats to the life of the replying respondent and her family, therefore, on appeal, the respondent.3 was retained in the school by the competent authority. Copy of the letter is attached as Annexure – A.
- 3- No comments, but as the replying respondent was holding the charge , therefore as per status quo order she kept continued her duty.
- 4- Correct. The appellate authority was directed to decide the said appeal.
- 5- Denied for want of knowledge.
- 6- Not related to replying respondent. More over the replying responded was senior teacher of the school is to be posted there while the appellant's school was abolished, therefore she should be adjusted somewhere else.
- 7- Not related to replying respondent. However, it is added that the appellant cannot ask for choice posting. More over the replying respondent's tenure was not completed then how she could be transferred.
- 8- Not related to replying respondent. However it is added that as per Regulatory Act the replying respondent can also not be transferred out of her U/C i.e U/C-19.
- 9- The appellant's appeal is not maintainable as no departmental appeal preferred and therefore liable to be set-aside on the following grounds amongst the others:

GROUND:

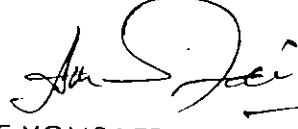
- A- incorrect hence denied.

- B- Incorrect and misconceived. The replying respondent belongs to U/C 19 and as per Regulatory Act, she cannot be posted out of her union council.
- C- Not related to replying respondent. However, the appellant has rightly been posted by the competent authority.
- D- Incorrect, hence denied in total.
- E- Incorrect. The replying respondent was retained in the school because she was senior in that school whereas the school of the appellant was abolished and as such legally she cannot disturb the replying respondent. Secondly the respondent.3 retained in her own school due to security reasons as threat was circulated to the family member of the replying respondent by the concerned Deptt:
- F- Incorrect hence denied.
- G- Incorrect. The respondent.No.1 has not passed the impugned order.
- H- Incorrect and hence denied.
- I- No comments.

It is therefore most humbly prayed that the appeal of the appellant may be dismissed with costs being not maintainable.

RESPONDENT NO.3

THROUGH:


M.ASIF YOUSAFZAI

ADVOCATE.

AFFIDAVIT.

It is affirmed that the contents of reply are true and correct.



BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.

APPEAL NO. 596/2015

Nadra Parveen.

VS

Education Deptt: .

REPLY TO APPLICATION ON BEHALF OF RESPONDENT NO. 3

(IRUM AMBREEN)

R.SHEWETH.

PRELIMINARY OBJECTIONS:

- 1- The appellant has no cause of action.
- 2- The appellant has no locus standi.
- 3- The appellant cannot ask for choice posting under section 10 of the Civil Servant Act, 1973 nor can ask as such under section 4-(b) of the Service Tribunal Act 1974.
- 4- The application is not maintainable under section 56(d) of the Specific relief act.

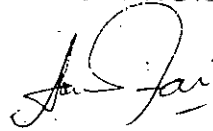
FACTS:

- 1- No comments.
- 2- The facts and grounds of the reply may also be considered as integral part of this reply and the appellant has not any prima facie case.
- 3- Incorrect hence denied.
- 4- Incorrect. The order of the Tribunal is fully acted upon.
- 5- Incorrect, hence denied.

It is therefore most humbly prayed that the application in hand may be dismissed with costs.

RESPONDENT NO.3

THROUGH:



M.ASIF YOUSAFZAI

ADVOCATE. •

AFFIDAVIT.

It is affirmed that the contents of reply, to application are true and correct.



THE KHYBER PAKHTUNKHWA (APPOINTMENT, DEPUTATION, POSTING AND TRANSFER OF TEACHERS, LECTURERS, INSTRUCTORS AND DOCTORS) REGULATORY ACT, 2011

AN
ACT

to regulate by law appointments, postings and transfers of teachers serving in primary, middle, secondary and higher secondary schools, lecturers in colleges and instructors in technical institutions and doctors in health facilities.

Preamble.---WHEREAS it is expedient to regulate by law appointments, postings and transfers at local level, of teachers serving in primary, middle, secondary and higher secondary schools, lecturers in colleges and instructors in technical institutions and doctors in health facilities and to ensure the availability of teachers in schools, lecturers in colleges and instructors in technical institutions and the doctors in health facilities, and to regulate deputation of doctors abroad, and to provide for matters connected therewith or ancillary thereto;

It is hereby enacted as follows:

1. Short title, application and commencement.---(1) This Act may be called the Khyber Pakhtunkhwa (Appointment, Deputation, Posting and Transfer of Teachers, Lecturers, Instructors and Doctors) Regulatory Act, 2011.
(2) It shall apply to teachers serving in primary, middle, secondary and higher secondary schools, lecturers in colleges as well as commerce colleges and instructors serving in technical institutions and doctors serving in the health facilities in the Province of the Khyber Pakhtunkhwa.
(3) It shall come into force at once.
2. Definitions.---(1) In this Act, unless the context otherwise requires, the following expressions shall have the meanings hereby respectively assigned to them that is to say,
 - (a) "Commission" means the Khyber Pakhtunkhwa Public Service Commission;
 - (aa) "college" means a degree college;
 - (b) "doctor" means a doctor serving in the health facility;
 - (c) "Government" means the Government of the Khyber Pakhtunkhwa;
 - (d) "health facilities" mean all health facilities established and managed by Government to provide medical facilities to general public;

(e) "lecturer" and "instructor" respectively means a lecturer or an instructor serving in a Technical Institution as well as in a college, as the case may be;

(f) "prescribed" means prescribed by rules made under this Act;

(g) "rules" mean the rules made under this Act;

(h) "school" means school in the public sector including primary, middle, secondary school, higher secondary school or an institution of equivalent level imparting education through any system or medium of instruction in the public sector;

(i) "teacher" means a teacher of primary, middle, secondary or higher secondary school; and

(j) "technical institution" means and includes a Commerce College or Government College of Management Sciences or Technical Institute or Technical and Vocational Training Center or Skill Development Center in the public sector imparting technical education to students leading to the award of a degree or a diploma or a certificate.

(2) Words and phrases used in this Act, but not defined, shall have the same meanings as respectively assigned to them under the relevant federal law or provincial law or any other statutory order or rules for the time being in force.

3. Appointment, posting and transfer of primary school teachers.---(1) The vacancy of primary school teacher shall be filled in from the candidates belonging to the Union Council of their permanent residence mentioned in their Computerized National Identity Card and domicile, on merit and if no eligible candidate in that Union Council is available where the school is situate, such appointment shall be made on merit from amongst eligible candidates belonging to the adjacent Union Councils:

Provided that on availability of a vacancy, a primary school teacher, appointed from adjacent Union Council, as referred to in this sub-section, shall be transferred against a vacant post in a school of the Union Council of his residence within a period of fifteen days.

(2) Upon marriage, the primary school teacher on request may be transferred to the school in the Union Council, where his spouse, ordinarily resides, subject to the availability of vacancy.

(3) The primary school teacher shall be transferred to other school within the Union Council on completion of tenure as may be prescribed or before completion of tenure, subject to the policy of rationalization for maintaining certain students teachers ratio, if any.

(4) Government shall, within a period not exceeding one year of the commencement of this Act, make arrangement for posting of all the primary school

(29)

teachers appointed prior to coming into force of this Act, to the schools of their respective Union Councils or adjacent Union Councils, as the case may be.

4. Appointment of doctors, lecturers, instructors, subject specialists and teachers on adhoc basis.---(1) Government may, through the competent authorities make adhoc appointment on merit against the vacant posts of doctors, lecturers, instructors, subject specialists and teachers, falling within the purview of Commission, in a district concerned from the domicile holders of that district for a period of one year or till the arrival of recommendees of Commission, whichever is earlier after fulfilling the pre-requisites of giving wide publicity in the press. On assumption of charge of post by recommendee of the Commission, the services of such ad hoc appointee shall stand automatically terminated:

Provided that if no suitable and eligible candidate is available in the district concerned for appointment, then the candidates belonging to the neighbouring districts shall be considered for appointment in the order of their merit.

(2) Save as the appointment made under proviso of this section, "ad hoc appointee" shall serve in the district of his domicile.

(3) The post of a doctor, lecturer, instructor, subject specialist or teacher who proceeds on training or long leave may be treated as vacant post for the purpose of contract or contingent appointment till the return of such employee from training or long leave and assumption of charge of the post:

Provided that the period of such training or long leave shall not be less than one year and no appointment on contract or contingent shall be made on the post which may fall vacant for a period less than one year.

5. Initial posting. --- (1) The doctors, lecturers, instructors subject specialist or teachers, upon their appointment shall be first posted in the periphery of the zone against whose quota they have been recruited, and they shall not be transferred for a period of at least three years.

(2) Upon expiry of the tenure as referred to in sub-section (1), transfer shall be made only upon the availability of substitute.

6. Deputation of Doctors.---(1) Government may allow deputation abroad for all categories of doctors only once in their entire service, for a period not exceeding three years.

(2) Deputation to "Foreign Service" within Pakistan shall be permissible only in respect of medical officers for a period not exceeding three years:

Provided that no further extension, on expiry of agreed tenure shall be given to the doctors who are already on deputation abroad or within Pakistan.

7. Postgraduate Medical Education.---(1) The Health Department, on the basis of objective need assessment and analysis, shall determine the intake number of Trainee Medical Officers (TMOs) in Postgraduate Medical Institute (PGMI) and Junior Registrars in Tertiary Care Hospitals every year. This stipulated number shall not exceed in any case.

(2) Any doctor selected or permitted for postgraduate medical training shall be treated on leave without pay and may be entitled only for stipend fixed by Government from time to time for such training.

(3) A doctor selected or permitted for postgraduate medical training shall provide surety bond prescribed by Government ensuring that upon completion of his studies for which he was initially selected, shall compulsorily serve for three years in the district of his domicile and in case of non-availability of a post in the district of domicile, he shall serve for three years in the rural area.

(4) For the purpose of sub-section (3), the doctor shall also provide guarantee of two government officers.

(5) In case of violation of sub-section (3), Government shall serve one month notice upon the doctor for resumption of duty, failing which the amount shall be recovered from him or from the guarantor, as the case may be.

8. Provisions relating to doctors apply to lecturers and instructors. ---The provisions relating to doctors in section 7 of this Act shall mutatis mutandis apply to lecturers and instructors.

9. Act to over-ride other laws.---The provisions of this Act shall have effect notwithstanding any thing contained in any other law for the time being in force.

10. Jurisdiction barred.---Save as provided under the Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973), the Khyber Pakhtunkhwa Civil Servants (Appeal) Rules, 1986 and the Khyber Pakhtunkhwa Service Tribunal Act, 1974 (Khyber Pakhtunkhwa Act No. I of 1974), no order made or proceedings undertaken under this Act, or the rules made there under or any officer authorized by it shall be called into question in any Court, and no injunction shall be granted by any Court in respect of any decision made, or proceedings taken in pursuance or by any power conferred by or under this Act or the rules.

11. Removal of difficulties.---Government may, by order, provide for the removal of any difficulty which may arise in giving effect to the provisions of this Act.

12. Power to make rules.---Government may make rules for carrying out the purposes of this Act.

No. 3421
Date: 12/06/15



انسپیکٹر جنرل آف پولیس خیبر پختونخواہ کے خصوصی ہدایات

حال ہی میں رونما ہونے والے واقعات اور انتہائی جنس رپورٹس سے یہ بات عیاں ہوتی ہیں کہ دہشتگردوں نے پولیس اور دیگر سکیورٹی اداروں کے افسران کو نشانہ بنانے پر اپنی توجہ مرکوز کی ہے۔ لہذا انسپیکٹر جنرل آف پولیس خیبر پختونخواہ نے ذیل ہدایات جاری کیں ہیں۔

- (i) تمام افسران موجود خطرہ سے ذاتی طور پر آگاہی حاصل کریں اور انکے ساتھ پہلے سے موجود حفاظتی انتظامات کے علاوہ مناسب حفاظتی اور احتیاطی تدابیر اختیار کریں۔
- (ii) اس بات کو ہر صورت میں یقینی بنانا کہ گھر سے دفتر جاتے وقت ایک ہی روٹ مسلسل استعمال نہ کریں۔
- (iii) اگر ایک ہی روٹ استعمال کرنا مجبوری ہو تو گھر سے نکلنے سے پہلے سفید پارچات میں کسی کو تعینات کریں تاکہ وہ باہر گئی اسٹریٹ کا مکمل معائنہ کرے مشکوک افراد پر نظر رکھیں۔
- (iv) یہ ہدایات تمام اہلکاروں کیلئے ہیں۔

محمد طاہر خان داوڑ

DSP آپریشن

برائے انسپیکٹر جنرل آف پولیس خیبر پختونخواہ

All Sst
SP Security
For N/A

No. 12358-60/OS (ops)

Dated 12-06-15

نوٹ:- یہ ہدایات دن میں تین بار 10 دن کیلئے بذریعہ دائرہ پولیس تمام اضلاع کو سنانا ہے۔

1/2 Control
For Compliance
as directed.

SSP/ops, Investigation & Traffic

Comdt - CPO

SP, Hqs -

Circulate to all stations for
strict compliance

Secy/All DSsP of sec unit

For compliance as directed

SP Security

1

(1)

DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR.

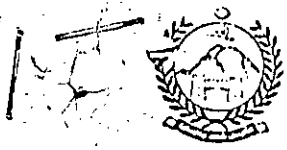
OFFICE ORDER:-

Consequent upon the recommendation of Departmental Promotion Committee and in pursuance of the Govt. of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No. SO (B&A) 1-16/E&SE/2008 dated 12/10/2012 and No. SO(PE) 4-5/SSRC/Meeting/ 2012/ Teaching Cadre dated 13/11/2013 the following Primary School Teachers BPS.12 are hereby promoted to the post of Primary School Head Teachers (PSHT) BPS.15 plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with immediate effect in schools noted against their names

S#	Seniority No.	Name of Circle	Teacher name	Name of School	Posted at
1	2	H/ ABAD	KHATOON BEGUM	GGPS NO.1.BARA LINE	GGPS NO.1.BARA LINE
	7	CITY	ABIDA YASMEEN	GGPS FAISAL COLONY NO.1	GGPS FAISAL COLONY NO.1
3	8	CITY	TASLEEM BEGUM	GGPS FAISAL COLONY NO.2	GGPS FAISAL COLONY NO.2
4	15	CITY	FATIMA BEGUM	GGPS DEEN BAHAR COLONY NO.2	GGPS Kandi Marozai No.2
5	16	DAUDZAI	NUSRAT-BEGUM	GGPS TODA	GGPS TODA
6	19	CITY	JAVIDA AKHTAR	GGPS ZARYAB COLONY NO.1	GGPS ZARYAB COLONY NO.1
	28	CANTT:	MUMTAZ SHAHEEN	GGPS DABGARI BANAT	GGPS DABGARI BANAT
8	33	CITY	ZARINA FAYAZ	GGPS IJAZ ABAD SHAHEEN MUSLIM TOWN	GGPS Suleman Khel
9	34	CITY	NAZMA TAUQEER	GGPS JOGIWARA NO.1	GGPS JOGIWARA NO.1
10	43	CITY	SHAHNAZ AKHTAR	GGPS QAID ABAD NO.2	GGPS QAID ABAD NO.2
11	45	City	Nusrat Shaheen	GGPS Gear Gatri No.2	GGPS Gear Gatri No.2
12	50	H/ ABAD	SURRIYA BANO	GGPS ISLAMIA COLLEGE	GGPS ISLAMIA COLLEGE
13	73	CITY	TARA JABEEN	GGPS SARBILAND PURA	GGPS SARBILAND PURA
14	90	CANTT:	ZARINA SARFARAZ	GGPS GULSHAN REHMAN	GGPS GULSHAN REHMAN
15	94	CITY	SAJIDA BIBI	GGPS SIRKI GATE	GGPS Mian Jee Baba
16	96	H/ ABAD	JAMILA BANO	GGPS NO.1.BARA LINE	GGPS Nodah Payan
17	98	H/ ABAD	NAJMA FIRDOS	GGPS BADEZAI	GGPS BADEZAI
18	99	CITY	NIGHAT RAHANA	GGPS ZARYAB COLONY NO.2	GGPS ZARYAB COLONY NO.2
19	104	CITY	SALMA KOUSAR	GGPS ZARGAR ABAD	GGPS Maryam zai
20	113	CITY	NUSRAT ANSARI	GGPS SHAH DAND	GGPS SHAH DAND
21	114	CANTT:	TABASSUM RUKHSANA	GGPS ACHAR 1	GGPS ACHAR 1
22	116	CANTT:	RUKHSANA ABASS	GGPS SATTAR SHAH	GGPS Achar No.2
23	118	CITY	BUSHRA NIGHAT	GGPS GULBAHAR NO.2	GGPS GULBAHAR NO.2
24	129	DAUDZAI	NIYYAR SULTANA	GGPS SHAH ALAM	GGPS SHAH ALAM
25	130	CITY	SHAMIM AKHTAR	GGPS AKHOON ABAD	GGPS AKHOON ABAD
26	134	CITY	NIGAHAT YASMEEN	GGPS SHAIKH ABAD	GGPS SHAIKH ABAD
27	136	CANTT:	NASIRA BIBI	GGPS ASIA PARK	GGPS ASIA PARK
28	137	CANTT:	TAHIRA PERVEEN	GGPS IRRIGATION COLONY	GGPS IRRIGATION COLONY
29	139	C/PURA	ROBINA NAZLI	GGPS Yousaf khel	GGPS Yousaf khel
30	147	CITY	NAVEEJA BANO	GGPS WAZIR BAGH NO.1	GGPS WAZIR BAGH NO.1
31	148	H/ ABAD	SHAHIDA PARVEEN	KOTLA MOHSIN KHAN	GGPS Shaheen Abad
32	149	CITY	REHANA DAUD	GGPS SHAH DAND	GGPS Sufaid Sung
33	150	CITY	ROMANA BASHIR	GGPS Jewan Mahal	GGPS Jewan Mahal
34	151	CITY	IMRANA TAUQEER	GGPS DALAZAK ROAD	GGPS DALAZAK ROAD
35	155	CITY	SAHIB SULTAN	GGPS HAIDAR COLONY NO.1	GGPS HAIDAR COLONY NO.1
36	156	CITY	NASIM AKHTAR	GGPS AFGHAN COLONY NO.1	GGPS AFGHAN COLONY NO.1
37	157	CITY	RIFAT JEHAN ARA	GGPS GUL ABAD PESHAWAR	GGPS GUL ABAD PESHAWAR

2

S/1	Seniority No.	Name of Circle	Teacher name	Name of School	Posted at
214	479	CITY	AZRA BEGUM	GGPS AKHOON ABAD	GGPS Namdar Khan Karoona
215	481	CITY	BUSHRA BIBI	GGPS GOAR GATHRI NO.2	GGPS Tor Kanay
216	484	CITY	FARAH YOUNIS	GGPS KAKSHAL NO.1 QUAID ABAD	GGPS Ayaz Karoona
217	485	CITY	SUMAIRA ALI	GGPS GUL ABAD PESHAWAR	GGPS Bela Barmad Khel No2
218	488	H/ ABAD	SAEEDA BEGUM	DANISH ABAD	GGPS Palosi Talarzai
219	489	C/Pura	NAFEESA BANO	GGPS SARDAR GARHI	GGPS SARDAR GARHI
220	490	CANTT:	GUL E RANA	GGPS ANDI ARBAB 1	GGPS Mera Sheikhan
221	491	CITY	FARZANA BEGUM	GGPS AFGHAN COLONY NO.1	GGPS Muslim Abad
222	492	CANTT:	RIZWANA NAHEED	GGPS CANTT NO 1	GGPS Syed-Ena-Zenab
223	493	C/PURA	SAEEDA AMAN	GGPS CHAMKANI NO.3	GGPS Marna
224	494	CITY	ZAKIA AMAN	GGPS Rasheed Abad	GGPS Rasheed Abad
225	495	CITY	SHABANA ROHI	GGPS SHAIKH ABAD	GGPS Khawaja Mir Killay
226	496	CITY	IRUM AMBAREEN	GGPS OLD KARIM PURA	GGPS OLD KARIM PURA
	497	H/ ABAD	RUHSANA BEGUM	GGPS NO.1.HAYATABAD	GGPS Achini No.1
228	498	CITY	SHAZIA SHAMS	GGPS AFGHAN COLONY NO.3	GGPS Niami
229	501	H/ ABAD	Robeeca	GGPS FOREST COLLEGE	GGPS Palosi Piraan
230	502	CITY	SAIRA WAZIR	GGPS ZARYAB COLONY NO.1	GGPS Melogan
231	503	H/ ABAD	MUSRRAT IMRAN	GGPS NO.3.TEHKAL BALA	GGPS Mula Zai
232	507	CITY	FARZANA YASMEEN	GGPS ZARGAR ABAD	GGPS Adezai No.1
233	508	CITY	SHAZIA AMBAREEN	GGPS GULBAHAR NO.2	GGPS Talam Khan Killi
234	512	CANTT:	SHAHNAZ BEGUM	GGPS SWATI GATE	GGPS Charkha Kheli
235	515	C/Pura	SAMINA SADAQAT	GGPS WADPAGGA	GGPS WADPAGGA
236	516	C/Pura	SHOUKAT PERVEEN	GGPS JAGRA MALOGO	GGPS No.2 Mera Kachori
237	520	CANTT:	ASMAT JEHAN	GGPS PAJAGGI	GGPS PAJAGGI
238	522	CITY	TAYYABA SIDDIQI	GGPS SARDILAND PURA	GGPS Karyana
239	523	CITY	RUHSANA SHAHEEN	GGPS MOHALLA ISLAM ABAD	GGPS Sama Badaber
240	524	CANTT:	KALSOOM BEGUM	GGPS DABGARI BANAAT	GGPS Nakband
241	525	CANTT:	NAZIA BEGUM	GGPS GARHI QAMAR DIN	GGPS Garhi Fazal Rahim
242	528	DAUDZAI	RUHSANA BUKHARI	GGPS KUKAR	GGPS KUKAR
243	532	C/Pura	WAHIDA NAZ	GGPS Chamkani No.1	GGPS Tember Pura
244	533	DAUDZAI	NOOR-UL- HAYA	GGPS DAMAN AFGHANI	GGPS DAMAN AFGHANI
245	536	H/ ABAD	SHAKEELA GUL	GGPS NO.2.POLICE COLONY	GGPS Regi No.1
246	537	CITY	RUHSANA YASMEEN	GGPS GOAR GATHRI NO.2	GGPS Badaber Maryamzai
247	538	H/ ABAD	HAYAT-UN NAFS	FOREST COLLEGE	GGPS Forest College
248	539	C/Pura	RASHIDA BEGUM	GGPS Duran Pur	GGPS Budni
249	541	CANTT:	JAMSHADA	GGPS GULSHAN REHMAN	GGPS Khalozai Adezai
250	543	BADABER	FARIDA BEGUM	GGPS SHIEKH MUHAMADI NO.1	GGPS SHIEKH MUHAMADI NO.2
251	544	CANTT:	SHAZIA BANO	GGPS CANTT NO 1	GGPS Passani Payan
252	545	CANTT:	SHAHEEN BEGUM	GGPS ATTA MUHAMMAD	GGPS Kagawala Sharif Abad
253	546	CANTT:	SHAHNAZ GUL	GGPS ASIA PARK	GGPS Passani Bala
254	547	MATHIKA	ZAKIA MENHAS	GGPS HASSAN ABAD	GGPS HASSAN ABAD
255	551	BADABER	TASLEEM BEGUM	GGPS BAZID KHEL NO.3	GGPS BAZID KHEL NO.3
256	553	C/Pura	NIGHAT NAZNEEN	GGPS NO.3 CHAMKANI	GGPS No.1 Banda Kachori



OFFICE OF THE MINISTER FOR
COMMUNICATION & WORKS ✓
KHYBER PAKHTUNKHWA

5

DEO(F),
Peshawar.

Madam A.O.A.

Mst Nadia Parveen is personally
known to me. Please transfer from
GrGrps old kashim puda to GrGrps Jalabala
as per rule & policy may be cancelled
immediately.

Truvs

ARIF YOUSAF
ADVOCATE
MPA-PK4-KPK

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR

OFFICE ORDER

6

Consequent upon approval by the competent authority, the following PSHT are hereby ordered on their own pay and BPS against the Schools mentioned against each name in the interest of public service with effect.

S. No	Name of Teacher	From	To	Remarks
1.	Mst: Irum Ambareen PSHT	GGPS Jala Bela	GGPS Old Karimpura	V.S.No.2
2.	Mst: Nadra Parveen PSHT	GGPS Old Karimpura	GGPS Jala Bela	V.S.No.1

Note:- No TA/DA etc is allowed.
Charge report should be submitted to all concerned.

(SAMINA GHANI)
DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR.

Endst: No. 7118-22 dated 12/04/2014.

Copy forwarded to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. SDEO(Female) Peshawar.
3. ASDEO Circle Concerned as desired.
4. Head Teachers concerned.
5. Teachers concerned.

S. Ghani
DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR

S No (2) may be retain
at GGPS Old Karim Pura has
Recommend by Minister Mineral. KP.

S. Ghani
Private Secretary To Minister for
Elementary & Secondary Education
Khyber Pakhtunkhwa

12/4/12
ZIA ULLAH
Minister
for Mineral Development
Khyber Pakhtunkhwa



CHIEF MINISTER'S SECRETARIAT
KHYBER PAKHTUNKHWA
PESHAWAR

7

No.SO-1/CMS/KPK/3-15/2014 /505
Dated: 18-04-2014.

To

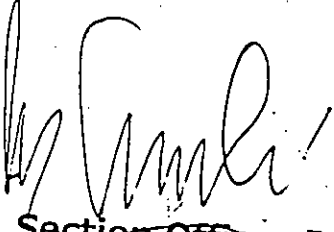
The District Education Officer (Female),
Elementary & Secondary Education Department,
Peshawar.

Subject: **CANCELLATION OF TRANSFER ORDER**

Memo:

I am directed to enclose herewith a copy of self-explanatory application of Ms. Nadra Parveen, PSHT, GGPS, Old Karimpura under transfer to Jalabaial for necessary action as per rules/policy under intimation to this Secretariat please.

Encls: As above.


Section Officer-I

Ends: No and Date Even

Copy forwarded to the:-

PS to Principal Secretary to the Chief Minister, Khyber Pakhtunkhwa.

Section Officer-I

748
22/4/14.

گورنمنٹ آف ایجوکیشن، ایچ ایچ ایس، راولپنڈی، پاکستان

8

غائب غائب!

گزارش ہے کہ سائیدہ کی طبیعت بہتر نہیں ہے

Retinalization Policy کی March 1994 میں گورنمنٹ آف ایجوکیشن، ایچ ایچ ایس اور ایڈمنسٹریٹو سروسز میں یونین آف ٹیچرز اور قانون سے مطابقتی - جبکہ ایچ ایچ ایچ میں PSMT جو کہ اس سبب جوئے ختم ہو گیا اور گورنمنٹ آف ایجوکیشن، ایچ ایچ ایس میں سرکار نے 11-4-14 کو پوسٹ کر دیا ہے - تاہم اس کے اثر کے تحت یہ دن

سائیدہ کو جان بیلہ ڈالنے اور اس کے جگہ اس کے جرنیل کو بحال کر دیا ہے - جو کہ شہ صرف جانوں کی طرف متوجہ ہے - سائیدہ نا اقامتی اور لا قانونی کی حد ہے -

اس کے گزارش ہے کہ اگر اند قانون کو منسوخ کر کے

ہوے - سائیدہ نے اس تنازعہ اثر کو ختم کر دیا سائیدہ کو گورنمنٹ آف ایجوکیشن، ایچ ایچ ایس اور ایڈمنسٹریٹو سروسز میں پوسٹ کر دیا ہے - جو کہ موجودہ حکومت نے ہی دیا ہے - کہ انصاف اور قانون کے تحت تمام کاموں اور انجمنوں کے لئے ہے -

اعراض

تاریخ 15 مارچ 1994ء گورنمنٹ آف ایجوکیشن، ایچ ایچ ایس اور ایڈمنسٹریٹو سروسز

PROF. per
retain account
in political GPS
kari-pna
Mr. Shaukat Ali Yousafzai
Minister of Health,
Khyber Pakhtunkhwa.



OFFICE OF THE MINISTER FOR HEALTH,
KHYBER PAKHTUNKHWA.

9

No. PS/MIN/Health/KP
Dated Peshawar the April 15, 2014

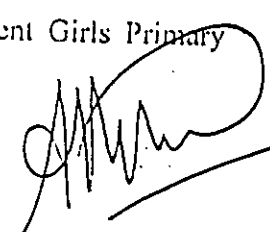
To

The District Education Officer (Female)
Peshawar.

Subject: TRANSFER/POSTING

I am directed to refer to the subject noted above and to state that Mst. Nadra Parveen, PSHT Elementary & Secondary Education Department and presently working at Government Girls Primary School Old Karimpura and has been transferred to Government Girls Primary School, Jala Bela. She belongs to the constituency of the Honourable Minister for Health, Khyber Pakhtunkhwa (PK-02).

2. Honourable Minister for Health, Khyber Pakhtunkhwa has been pleased to desire that the transfer order in respect of Mst. Nadra Parveen, PSHT to Government Girls Primary School, Jala Bela may be cancelled and she may be retained at Government Girls Primary School Old Karimpura in the public interest.


(Azizur Rehman)
Private Secretary

Khyber Pak...

محمد علی صاحب در دست راستی صاحب
ادارہ اعلیٰ تعلیم و تربیت، اسلام آباد

10

صاحب - عالیجناب

گزارش ہے کہ سائیدہ کی تعلیم ستمبر 1957ء

میں یو این اے کے تحت March 1957ء میں گورنمنٹ اراک سول اور لڑکیوں کے

PSAT جو کہ اس سے سبب ہوئی کہ گورنمنٹ اراک سول جالہ بیدہ میں ستمبر

14-4-11 کو یو این اے کے تحت - تاہم اس کے لئے اس کے لئے

سائیدہ کو جالہ بیدہ کے لئے اس کے لئے اس کے لئے

یو این اے کے لئے - جو کہ صرف اس کے لئے اس کے لئے -

تا انسانی اور لاء قانون کے تحت ہے -

اس کے لئے اس کے لئے اس کے لئے اس کے لئے

گورنمنٹ اراک سول اور لڑکیوں کے لئے اس کے لئے

موجودہ حکومت کے لئے اس کے لئے اس کے لئے

اعراض

بیمارہ سر دین احمد
گورنمنٹ اراک سول اور لڑکیوں کے لئے

بیمارہ سر دین احمد
گورنمنٹ اراک سول اور لڑکیوں کے لئے

پہلو
15-4-11
Asad

Mr. Shaukat Ali Yousofzai
Minister of Health,
Khyber Pakhtunkhwa.
Soff
Process Pl.
Atta ur Rehman
PS-11
KHYBER PAKHTUNKHWA.

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR.

OFFICE ORDER.

Consequent upon approval by the competent authority, the following PSHT are hereby ordered on their own pay and BPS against the Schools mentioned against each name in the interest of public service with effect.

S. No	Name of Teacher	From	To	Remarks
1.	Mst: Irum Ambareen PSHT	GGPS Jala Bela	GGPS Old Karimpura	V.S.No.2
2.	Mst: Nadra Parveen PSHT	GGPS Old Karimpura	GGPS Jala Bela	V.S.No.1

Note:- No TA/DA etc is allowed.
Charge report should be submitted to all concerned.

(SAMINA GHANI)
DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR.

Endst: No. 7118-22 dated 12/04/2014.

Copy forwarded to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. SDEO(Female) Peshawar.
3. ASDEO Circle Concerned as desired.
4. Head Teachers concerned.
5. Teachers concerned.

S
DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR

Shaw
the minister
Per
Per
ZIA ULLAH AFRIDI
Minister
for Mineral Development
Khyber Pakhtunkhwa

12

جملہ AGOs پشاور

THREAT ALERT

Dy: No. 1779	PA-CCPO
Di: 25.4.14	
Spec: -	

124 پر مل، معلومات کے مطابق شریںندوں کے خلاف FATA میں ہونے والے فضائی حملوں کے عمل کے طور پر TTG نے سرکاری ملازمین (خاص کر FC، LEAs اور Police) اور اسٹک ایبل خانہ کو نشانہ بنانے کی منصوبہ بندی کر رکھی ہے۔

لہذا آپ کو ہدایت کی جاتی ہے کہ اس سلسلے میں مقامی پولیس، انتظامیہ سے رابطہ میں رہیں اور اپنا سروس استہمال کریں۔
میں پیشگی معلومات اکٹھا کر کے پولیس، انتظامیہ اور سیشن برانچ ہیڈ کو آگے بروقت اطلاع دیں۔

برائے ایڈیشنل انسپکٹر جنرل آف پولیس
پیش برانچ خیبر پختونخوا پشاور۔

24.04.2014 مورخہ

نمبر 31-27730/پی.بی.

Copy for information to:-

- 1. Provincial Police Officer, Khyber Pakhtunkhwa.
- 2. Capital City Police Officer, Peshawar.

IMP

SPR/SPS

Maximum vigilance and alertness is required to be exercised.

Perceps
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OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR.

13

OFFICE ORDER :-

In pursuance of the orders conveyed vide Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar letter No.6104-59/Rationalization/Estab: dated 01/04/2014 para No.7, the following Govt: Girls Primary Schools functioning in one premises with various title of school are merged with the school already functioning proper title with effect from 1/4/2014.

The senior most PSHT of the schools shown in column No. 6 will be act as a PSHT of the resultant school. The title of other schools stand abolished.

All the relevant record i.e, students attendance register, Teachers attendance, PTC registers etc: will be maintained by the PSHT of the host school..

S. No.	Name of Host school in which the schools given in Column No. 4 are to be merged.	school code	Name of schools to be merged with the school in Column: 2	School Code	Name of Teacher to act as PSHT in the host school.
1	2	3	4	5	6
1	GGPS Islamai College Peshawar	21276	GGPS Danish Abad	21242	Mst: Surrayya Begum
2	GGPS Hayat Abad No. 1 Peshawar	21267	GGPS Hayat Abad No.2	21268	Mst. Waheeda Begum
3	GGPS Hayat Abad No. 3 Peshawar	21269	GGPS Hayat Abad No. 4	32847	Mst. Najma Shaheen
4	GGPS Regi No 1 Peshawar	21497	GGPS Regi No 3	21499	Mst. Shakeela
5	GGPS Regi Lalma No 2 Peshawar	32999	GGPS Regi Lalma No.3	32999	Mst. Mussarat Begum
6	GGPS Shaheed Abad Peshawar	32859	GGPS Kotla Mohsin Khan	32844	Mst. Shahida Begum
7	GGPS Sangu No 1 Peshawar	21804	GGPS Sangu No 2	21503	Mst. Rubina
8	GGPS Sarband No 2 Peshawar	21529	GGPS sarband No 3	21507	Mst. Nafeesa Khatoon
9	GGPS Police Colony 1 Peshawar	21299	GGPS Police Colony	21300	Mst. Farrukh Naz
10	GGPS Dhaki Munawar Shah Pesh	21248	GGPS Andar Sher	21232	Mst. Shaheen Bano (Disable)
11	GGPS Gorgatri No 2 Peshawar	21258	GGPS yakatoot	21316	Mst. Nusrat Shaheen (Widow)
12	GGPS Jogiwar No2 Peshawar	21281	GGPS Jogiwar No1	21280	Mst. Nazma Toqeer
			GGPS Jogiwar No3	21282	
13	GGPS GulBad shah Jee	21260	GGPS Sara Kala Khan	21278	Mst. Shaheen Akhtar
14	GGPS Mohamand Abad Peshawar	21290	GGPS WazirBagh No.2	21314	Mst. Waheeda
15	GGPS Saeed Abad Peshawar	21306	GGPS Din Bahar No.1	21243	Mst. Shiraz Begum
16	GGPS Hazar Khawani 2 Peshawar	21272	GGPS Hazar K hawani No.3	100074	Mst. Dilshad Begum
17	GGPS GulBahar No.3 Peshawar	21263	GGPS Gulbahar No.1	21261	Mst. GulNaz
			GGPS Gulbahar No.4	32850	
18	GGPS Shah Jee Abad Peshawar	32859	GGPS Nanak Pura	21291	Mst. Javida Akhtar
			GGPS Faqir Abad	21251	
			GGPS Zaryab Colony No.1	21317	

14

No.	Name of Host school in which the schools given in Column No. 4 are to be merged.	school code	Name of schools to be merged with the school in Column: 2	School Code	Name of Teacher to act as PSHT in the host school.
19	GGPS Faisal Colony No.2 Peshawar	21249	GGPS Faisal Colony No.1 Peshawar	21250	Mst. Tasleem Begum
20	GGPS Afghan Colony No.2 Peshawar	21228	GGPS Afghan Colony No.1 Peshawar	21227	Mst. Naseem Akhtar
			GGPS Afghan Colony No.3 Peshawar	21229	
21	GGPS Mohallah Islam Abad Peshawar	21289	GGPS Nishtar Abad Peshawar	21292	Mst. Zeenat Saba
22	GGPS Zaryab Colony No.2 Peshawar	21318	GGPS Dalazak Road Peshawar	21241	Mst. Nighat Rehanna
23	GGPS Old Karim Pura Peshawar	21296	GGPS Gorgathri No.1 Peshawar	21257	Mst. Nadra Parveen
24	GGPS No.1 Muhammadzai Peshawar	21462	GGPS Muhammad Zai No.2 Peshawar	21463	Mst. Hameeda Bano
25	GGPS No.1 ChohaGujar Peshawar	21366	GGPS ChohaGujar No.2 Peshawar	32854	Mst. Munira Iqbal
26	GGCMS Phandu Gharif Abad Peshawar	32853	GGPS PhanduBala Peshawar	2148	Already working SST
27	GGPS Civil Quarter Peshawar	21239	GGPS Dehri Baghbanan Peshawar	21247	Mst. Imtiaz Begum
28	GGPS Railway Quarter Peshawar	212304	GGPS Railway Quarter No.2 Peshawar	21303	Mst. Nasim Akhtar
29	GGPS Nothia Qadeem Peshawar	21295	GGPS NothiaJadeed No.2 Peshawar	21294	Mst. Farhat Bibi
30	GGPS Deh Bahadar No.1 Peshawar	32871	GGPS Deh Bahadar No.2 Peshawar	21245	Mst. Shakila Akhtar
31	GGPS Bhatiani Peshawar	21340	GGPS Garhi Abdul Samao, Peshawar	21382	Mst. Kousar Jehan
32	GGPS Bazid Khel No.3 Peshawar	21351	GGPS Bazid Khel No.1 Peshawar	21349	Mst. Tasleem Begum
33	GGPS Cantt: No.3 Peshawar	21237	GGPS Cantt: No.1 Peshawar	21236	Mst. Humera Nargis
34	GGCMS Bara Sheikhan Peshawar	32869	GGPS Bara Sheikhan Peshawar	21347	Already working SST

District Education Officer,
(Female) Peshawar.

Endst: No. 6782-96 /F.No. ___/Merged School GGPS/P&D

Dated Peshawar the 5th of April, /2014

Copy forwarded for information and strict compliance to the :-

1. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Accountant General Khyber Pakhtunkhwa Peshawar.
3. SDEO (Female) Peshawar with the remarks that feasible proposal of surplus staff of the above schools according to existing rules and policy should be furnished for adjustment in the required schools on need basis within two days positively.
4. Deputy Director EMIS Cell with the request to delete the schools mentioned in column No. 4 from data
5. All the ASDEO (Female) District Peshawar.
6. ADEO (Female) Establishment Primary Local Office.

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR

OFFICE ORDER :-

15

In supersession of this office order issued under Endst: No.6782-96 dated 5/4/2014 and in pursuance of the orders conveyed vide Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar letter No.6104-59/Rationalization/Estab: dated 01/04/2014 para No.7, the following Govt: Girls Primary Schools functioning in one premises with various title of school are merged with the school already functioning proper title with effect from 1/4/2014.

The senior most PSHT of the schools shown in column No. 6 will be act as a PSHT of the resultant school. The title of other schools stand abolished.

All the relevant record i.e, students attendance register, Teachers attendance, PIC registers etc: will be maintained by the PSHT of the host school. No Creation / abolition of post is involved.

S. No.	Name of Host school in which the schools given in Column No. 4 are to be merged.	school code	Name of schools to be merged with the school in Column: 2	School Code	Name of Teacher to act as PSHT in the host (Resultant) school.
1	2	3	4	5	6
1	GGPS Islama College Peshawar	21276	GGPS Danish Abad	21242	Mst. Surrayya Begum
2	GGPS Hayat Abad No. 3 Peshawar	21267	GGPS Hayat Abad No.2	21268	Mst. Waheeda Begum
3	GGPS Hayat Abad No. 3 Peshawar	21269	GGPS Hayat Abad No. 4	32847	Mst. Najma Shaheez
4	GGPS Regi No 1 Peshawar	21497	GGPS Regi No 3	21499	Mst. Shahida
5	GGPS Regi Lalma No 2 Peshawar	32999	GGPS Regi Lalma No.3	32999	Mst. Mussarat Begum
6	GGPS Shaheed Abad Peshawar	32859	GGPS Kotla Mohsin Khan	32844	Mst. Shahida Begum
7	GGPS Sangu No 1 Peshawar	21804	GGPS Sangu No 2	21503	Mst. Rubina
8	GGPS Sarband No 2 Peshawar	21529	GGPS sarband No 3	21507	Mst. Nabeesa Khatoon
9	GGPS Police Colony 1 Peshawar	21299	GGPS Police Colony	21300	Mst. Farrukh Faz
10	GGPS Dhaki Munawar Shah Pesh	21248	GGPS Andar Sher	21232	Mst. Shaheen Bano (Disable)
11	GGPS Gorgatri No 2 Peshawar	21258	GGPS yakatoot	21316	Mst. Nusrat Shaheen (Widow)
12	GGPS Jogiwar No2 Peshawar	21281	GGPS Jogiwar No1	21280	Mst. Nazma Toqeer
13	GGPS GulBad shah Jee	21260	GGPS Sara Kala Khan	21282	Mst. Shaheen Akhtar
14	GGPS Mohamand Abad Peshawar	21290	GGPS WazirBagh No.2	21278	Mst. Waheeda
15	GGPS Saeed Abad Peshawar	21306	GGPS Din Bahar No.1	21314	Mst. Shiraz Begum
16	GGPS Hazar Khawani 2 Peshawar	21272	GGPS Hazar khawani No.3	21243	Mst. Dilshad Begum
17	GGPS GulBahar No.3 Peshawar	21263	GGPS Gulbahar No.1	1000/4	Mst. Gul Faz
			GGPS Gulbahar No.4	21261	
			GGPS Nanak Pura	32850	
18	GGPS Shah Jee Abad Peshawar	32859	GGPS Faqir Abad	21291	Mst. Javida Akhtar
			GGPS Zaryab Colony No.1	21251	
				21317	

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No.	Name of Host school which the schools given in Column No. 4 are to be merged.	School code	Name of schools to be merged with the school in Column: 2	School Code	Name of Teacher to act as PSIT in the host (Resultant) school.
19	GGPS Faisal Colony No.2 Peshawar	21249	GGPS Faisal Colony No.1 Peshawar	21250	Mst. Tasleem Begum
20	GGPS Afghan Colony No.2 Peshawar	21228	GGPS Afghan Colony No.1 Peshawar	21227	Mst. Naseem Akhtar
			GGPS Afghan Colony No.3 Peshawar	21229	
21	GGPS Mohallah Islam Abad Peshawar	21289	GGPS Nishar Abad Peshawar	21292	Mst. Zeenat Saba
22	GGPS Zaryab Colony No.2 Peshawar	21318	GGPS Dalazak Road Peshawar	21241	Mst. Nighat Behanna
23	GGPS Old Karim Pura Peshawar	21296	GGPS Gorgathri No.1 Peshawar	21257	Mst. Nadra Parveen
24	GGPS No.1 Muhammadzai Peshawar	21462	GGPS Muhammad Zai No.2 Peshawar	21463	Mst. Hameeda Bano
25	GGPS No.1 ChohaGujar Peshawar	21366	GGPS ChohaGujar No.2 Peshawar	32854	Mst. Munia Iqbal
26	GGCMS Phandu Gharif Abad Peshawar	32853	GGPS PhanduBala Peshawar	2148	Already working SSI
27	GGPS Civil Quarter Peshawar	21239	GGPS Dehri Baghbanan Peshawar	21247	Mst. Indira Begum
28	GGPS Railway Quarter Peshawar	212304	GGPS Railway Quarter No.2 Peshawar	21303	Mst. Nasim Akhtar
29	GGPS Nothia Qadeem Peshawar	21295	GGPS NothiaJadeed No.2 Peshawar	21294	Mst. Farhat Iqbal
30	GGPS Deh Bahadar No.1 Peshawar	32871	GGPS Deh Bahadar No.2 Peshawar	21245	Mst. Shakila Akhtar
31	GGPS Bhatian Peshawar	21340	GGPS Garhi Abdul Samad Peshawar	21382	Mst. Kousar Jehan
32	GGPS Bazid Khel No.3 Peshawar	21351	GGPS Bazid Khel No.1 Peshawar	21349	Mst. Tasleem Begum
33	GGPS Cantt. No.3 Peshawar	21237	GGPS Cantt. No.1 Peshawar	21236	Mst. Humera Bangish
34	GGCMS Bara Sheikhian Peshawar	32869	GGPS Bara Sheikhian Peshawar	21347	Already working SSI
35	GGPS Wazir Bagh No.1 Peshawar	2313	GGPS Wazir Bagh No.3 Peshawar	21315	Mst. Naveeda Bano

District Education Officer,
(Female) Peshawar.

Endst: No. 6901-51 / F.No. ___ / Merged School GGPS/P&D Dated Peshawar the 9th of April, /2014

Copy forwarded for information and strict compliance to the :-

1. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Accountant General Khyber Pakhtunkhwa Peshawar.
3. SDEO (Female) Peshawar with the remarks that feasible proposal of surplus staff of the above schools according to existing rules and policy should be furnished for adjustment in the required schools on need basis within two days positively.
4. Deputy Director EMIS Cell with the request to delete the schools mentioned in column No. 4 from data
5. All the ASDEO (Female) District Peshawar.
6. ADEO (Female) Establishment Primary Local Office.
7. ADEO P&D Local Office.

(S)

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To

**The District Education Officer (Female),
District Peshawar.**

Her Excellency!

I would like to draw your kind attention toward my professional activities that the undersigned presently an employ of Police Force and serving as SP/Security in Capital City Police Peshawar.

The spouse of the undersigned is an educator and presently serving/posted as Head-preceptor at Primary Girls School Old Karimpura.

As it is aware and there is no hidden issue regarding security and law and order situation across the province and especially this metrop olitan of KPK, alarming situation of security is extremely hovering and we (Police personnel/officers) standing like a rock before the challenges hurling by the miscreants/insurgents.

Keeping in view the above para No. 3 as discussed we especially law enforcers are bound to lead the life with tactics of security/safeguard alongwith offspring. It came to light that in next couple of days transfer/posting amongst the educators/head of its learning institutes etc run by the Provincial Government are expected take place or likely to reshuffle.

With the view of security issue it is declared that the same place of posting of my spouse Iram Ambareen i.e Primary Girls School Old Karimpura is quite appropriate from all respect as she is secured and under protection.

Your good self is requested that she may not be pulled out from her place of posting for the purpose of transfer/posting else where.

Thanking you and assuring you of my best cooperation at all times.



(JEHANZEB KHAN)
SUPERINTENDENT OF POLICE SECURITY
CAPITAL CITY POLICE PESHAWAR
Office Ph: No. 091-9212587
Cell No. 0333-9158005

4/5/15

The District Education Officer (Female),
District Peshawar.

18

Subject:

REGRET FOR PROMOTION FOR BPS-16.

15-2-2014

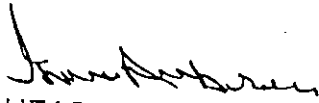
Her Excellency!

I would like to draw your kind attention that currently I am serving and posted at old Karimpura Primary School Peshawar City.

As it is aware and there is no hidden issue regarding security and law and order situation across the province, and especially this metropolitan of KPK, alarming situation of security is extremely hovering and my spouse (Police officer) standing like a rock before the challenges hurling by the miscreants/insurgents. He is serving as SP Security in Capital City Police Peshawar.

Keeping in view as discussed, the undersigned is fully unwilling to get promotion in BPS-16 due to mentioned above reasons. For the time being it is regretted by the undersigned and presented the option forgo in connection for further promotion.

Thanking you and assuring you of my best cooperation at all times.


(HEADMISS/ERUM AMBAREEN)
Old Karimpura Primary School
Peshawar City

17
14

CHARGE ASSUMPTION REPORT.

77

In pursuance of the Distt: Education officer (F) Peshawar, vide office order No. 77118-22 dated 12.04.2014 I Mst: Iram Ambareen PSHT do here by assume the charge of Head Mistress GGPs old Karim Pura Peshawar on 14.04.2014.

Iram Ambareen

(Iram Ambareen)
PSHT GGPs
Old Karimpura
Peshawar City,

Copy forwarded to the:-

1. Accountant General KPK Peshawar.
2. SDEO (Female) Peshawar.
3. ASDEO Circle City.

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BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR

SERVICE APEAL NO. 596/2015

Mst: Nadra Perveen VS Director (E & SE) KPK & others

Reply on Behalf of Respondents No. 1 & 2 to Application for and interim relief.

Respectfully Sheweth:-

The Respondents submit as under:-

Preliminary Objections.

1. That the applicant has no cause of action / locus standi to file the instant application.
2. That the instant application is based on mala fide intention.
3. That the applicant has not come with clean hands to this Hon' able Tribunal.
4. That the instant Application is not maintainable in the present form.
5. That this Hon' able Tribunal has got no jurisdiction to adjudicate upon the instant application.
6. The instant application is barred by law.


On Facts.

1. That Para-1 is legal, hence no comments.
2. That as the instant application is based on mala fide intention and makes out no prima facie case in favour of the applicant, hence para-2 of the instant application is incorrect and misleading.

- 45
3. That Para-3 of the instant application is incorrect and misleading hence denied. The impugned transfer order is without any political interference, favouritism /Nepotism and is according to the law, rules and policy.
 4. That Para-4 is also incorrect and misleading, hence denied. Moreover, the Respondent Department has decided the Departmental Representation on merits of the case wherein the Respondent No.3 who was already the Head Teacher of the Host School, Therefore, The Respondent Department has correctly retained the Respondent No.3 as the Head Teacher of the Host School i.e. GGPS ,Old Karim Pura Peshawar.
 5. That as there is no apprehension of any irreparable loss to the Applicant, therefore, Para-5 is incorrect and misleading, hence denied.

It therefore, humbly prayed that on the acceptance of this reply ; the instant application may very kindly be dismissed and the status quo order passed in favour of the applicant may also be vacated.


Director,
(E &SE) KPK, Peshawar.


District Education Officer,
(Female) Peshawar.