

Sr. No	Date of order/proceedings	Order or other proceedings with signature of Judge or Magistrate
1	2	3
	23.11.2017	<p style="text-align: center;"><b><u>BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL</u></b></p> <p style="text-align: center;"><b>Appeal No. 731/2016s</b></p> <p style="text-align: center;">Date of Institution ... 15.07.2016 Date of Decision ... 23.11.2017</p> <p>Mst: Samina Ameer, Lab Attendant,</p> <p style="text-align: right;"><b>Appellant</b></p> <p style="text-align: center;"><b>VERSUS</b></p> <p>1. The Government of Khyber Pakhtunkhwa through Secretary (E&amp;SE) Education Khyber Pakhtunkhwa Peshawar 2. The Director (E&amp;SE) Department, Khyber Pakhtunkhwa, Peshawar. 3. The District Education Officer (F), District Mardan. 4. The District Account Officer, District Mardan.</p> <p style="text-align: right;"><b>Respondents</b></p> <p>Mr. Noor Muhammad Khattak Advocate --- For appellant.</p> <p>Mr. Usman Ghani, District Attorney --- For respondents.</p> <p>MR. MUHAMMAD HAMID MUGHAL --- MEMBER MR. GUL ZEB KHAN --- MEMBER</p> <p style="text-align: center;"><b><u>JUDGMENT</u></b></p> <p style="text-align: center;"><b><u>MUHAMMAD HAMID MUGHAL, MEMBER:</u></b> Learned counsel for the appellant present. Mr. Zia Ullah, Deputy District Attorney for the respondents present.</p> <p>2. Appellant Samina Ameer has filed the present appeal u/s 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 wherein she</p>

made impugned the order/notification dated 06.07.2015 of Respondents No. 3 and stoppage of her salary.

3. Learned counsel contended that the appellant was adjusted/transferred to GGHS Shah Dhand Baba as Lab: Attendant vide order dated 11.05.2015 of Respondents No. 3 however within the next two months, in order to accommodate some blue eyed person the respondents No. 3 issued fresh notification dated 06.07.2015 whereby the appellant was deputed to work at the same school on need base till further order and that the appellant would draw pay from old station. Further argued that the salary of the appellant has also been stopped without any rhyme and reason. Further argued that the impugned order is against the law/rules and posting/transfer policy. Learned counsel for the appellant stressed for setting aside the impugned order.

4. As against that learned District Attorney defended the impugned order and argued that the competent authority has issued the impugned order in the public interest and to avoid complication for the purpose of smooth running of the concerned school administration.

5. Arguments heard. File perused.

6. It is not disputed that the impugned order was issued soon after the issuance of adjustment/transfer of the appellant to GGHS Shah Dhadan Baba. Learned District Attorney remained unable to show any reason much less a valid reason for the issuance of the impugned order and stoppage of the salary of the appellant. The

ADMIN

comments/reply submitted by the respondents department are also vague in as much as the actual background of the issuance of the impugned order was not disclosed. It is also not the case of the respondent department that post of Lab: Attendant is not available at GGHS Shah Dhand Baba. In the given circumstances the impugned order smacks off malafide on the part of the respondent department and found in violation of posting/transfer policy. Consequently, the present appeal is accepted and the impugned order dated 06.07.2015 is set aside. Resultantly the order dated 11.05.2015 stands restored. The respondent department is however at liberty to issue posting/transfer order in accordance with law/rules and posting/transfer policy. Parties are left to bear their own costs. File be consigned to the record room.

  
(GUL ZEB KHAN)  
MEMBER

  
(MUHAMMAD HAMID MUGHAL)  
MEMBER

**ANNOUNCED**  
**23.11.2017**

23.11.2017


Learned counsel for the appellant present. Mr.

Usman Ghani, District Attorney for the respondents present. Vide separate judgment of today of this Tribunal placed on file, the present appeal is accepted and the impugned order dated 06.07.2015 is set aside. Resultantly the order dated 11.05.2015 stands restored. The respondent department is however at liberty to issue posting/transfer order in accordance with law/rules and posting/transfer policy. Parties are left to bear their own costs. File be consigned to the record room.

**ANNOUNCED**

23.11.2017


  
(Gul Zeb Khan)  
Member

  
(Muhammad Hamid Mughal)  
Member

04.10.2017

Learned counsel for the appellant present. Mr. Usman Ghani, District Attorney for the respondents present. Learned District Attorney seeks adjournment. Adjourn. To come up for arguments 25.10.2017 before D.B.

  
Member  
(Executive)

  
Member  
(Judicial)

25/10/2017

Junior to counsel for the appellant and Mr. Kabirullah Khattak, AAG alongwith Mr. Abdul Jameel, AT for the respondents present. Junior to counsel for the appellant seeks adjournment as senior counsel is not in attendance. Last opportunity granted. To come up for arguments on 16/11/2018 before DB. The restraint order shall continue.

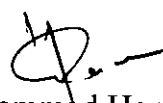
  
Member

  
Chairman

16.11.2017

Clerk to counsel for the appellant and Asst: AG for respondents present. Clerk to counsel for the appellant seeks adjournment. Adjourned. Last opportunity granted to the appellant. To come up for arguments on 23.11.2017 before D.B. the restraint order shall continue.

  
(Ahmad Hassan)  
Member

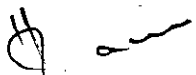
  
(Muhammad Hamid Mughal)  
Member

Service Appeal No. 731/2016

18.08.2017

Counsel for the appellant present. Mr. Muhammad Jan, Deputy District Attorney for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 08.09.2017 before D.B.

  
(Muhammad Amin Khan Kundi)  
Member (J)

  
(Muhammad Hamid Mughal)  
Member (J)

8/9/2017

Agent to counsel for the appellant and Mr. Ziaullah, Deputy District Attorney for the respondents present. Arguments could not be heard due to non-availability of DB. To come up for arguments on 27/9/2017 before DB.

  
(Muhammad Hamid Mughal)  
MEMBER

26.09.2017


Junior to counsel for the appellant and Asstt. AG for the respondents present. Request made on behalf of counsel for the appellant for adjournment. Adjourned. To come up for arguments 04.10.2017 before the D.B. The restraint order shall continue.

  
Member

  
Chairman

22.06.2017


Junior in counsel for the appellant and Mr. Abdul Jameel, Legal Assistant alongwith Mr. Ziaullah, Deputy District Attorney for the respondents present. Junior in counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 26.07.2017 before D.B. The restraint order shall continue.

  
(Muhammad Amin Khan Kundi)  
Member

26.07.2017

~~(Gul Zeb Khan)~~  
~~Member~~  
Junior to counsel for the appellant and Addl: AG for respondents present. Junior to counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 07.08.2017 before D.B. The restraint order shall continue.


  
(Ahmad Hassan)  
Member

  
(M. Hamid Mughal)  
Member

07.08.2017


Counsel for the appellant present. Mr. Muhammad Jan, Deputy District Attorney for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 18.08.2017 before D.B.


  
(Muhammad Amin Khan Kundi)  
Member (J)

  
(Muhammad Hamid Mughal)  
Member (J)

13.04.2017

Counsel for the appellant and Mr. Abdul Jameel Legal Assistant alongwith Addl. AG for the respondents present. Counsel for the appellant submitted rejoinder which is placed on file. To come up for arguments on 17.05.2017 before D.B. The restraint order shall continue.


  
(Ahmad Hassan)  
Member

  
(Muhammad Amin Khan Kundi)  
Member

17.05.2017

Counsel for the appellant present. Mr. Abdul Jameel, Legal Assistant alongwith Mr. Muhammad Adeel Butt, Additional AG for the respondents also present. Learned counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 22.06.2017 before D.B. The restraint order shall continue.

  
(GUL ZEB KHAN)  
MEMBER

  
(MUHAMMAD AMIN KHAN KUNDI)  
MEMBER



11.01.2017

Counsel for the appellant and Mr. Khan Bahadar, Senior Auditor alongwith Additional AG for the respondents present. Written reply by respondent No. 4 submitted. Respondent No. 3 has already submitted written statement. Learned Additional AG relies on the written statement submitted by respondent No. 3 on behalf of respondents No. 1 & 2. The appeal is assigned to D.B for rejoinder and final hearing for 06.03.2017 before D.B. The restraint order shall continue.

  
Chairman

06.03.2017

Clerk to counsel for the appellant, Asst: AG for respondents present. Arguments could not be heard due to General Strike of the Bar. To come up for arguments on 13.04.2017 before D.B. The restraint order shall continue.

  
(ASHFAQUE TAN)  
MEMBER

  
(MUHAMMAD AMIR NAZIR)  
MEMBER

25.08.2016

Appellant in person and Mr. Abdul Jamil, AT alongwith Addl. AG for respondents present. Written reply not submitted. Requested for adjournment. To come up for written reply/comments on 17.10.2016 before S.B.

  
Chairman

17.10.2016

Counsel for the appellant, M/S Abdul Jamil, Arabic Teacher for respondent No. 3 and Hameed ur Rehman, AD (Litigation) for respondents No. 1 and 2 alongwith Addl. AG for respondents present. Written reply submitted by respondent No. 3 while respondent No. 1 and 2 relies on the same. Written reply not submitted by respondent No. 4 he requested for adjournment. To come up for written reply/comments on 29.11.2016 before S.B.

  
Member

29.11.2016

Clerk to counsel for the appellant and Abdul Jameel, Arabic Teacher for respondents No. 1, 2 and 3 alongwith Assistant AG for respondents present. Respondents No. 1, 2 and 3 already submitted written reply. None present on behalf of respondents No. 4. To come up for written reply of respondent No. 4 on 11.01.2017 before S.B.

  
MEMBER

25.7.2016

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was appointed as Lab. Attendant at GGHSS Shah Dhand Baba Mardan vide order dated 19.04.1992. That there-after she was transferred against the post of Sweeperess to GGHS Sheikhanu Banda Lund Khwar where-after she was again transferred to GGHSS Shah Dhand Bana vide order dated 11.05.2015. That the appellant was serving as Lab. Attendance in the said school when vide impugned order dated 6.7.2015 her order was unilaterally converted as on detailment basis where-against she preferred departmental appeal on 17.3.2016 which was not responded and hence the instant service appeal on 15.7.2016.

That the appellant is entitled to serve at GGHSS Shah Dhand Baba as Lab. Attendant and that the impugned order converting her earlier transfer order as adjustment on detailment basis is against facts and law and made with an object to create a vacancy for initial appointment and deprive the appellant from serving against the said post as a regular civil servant despite her entitlement.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 25.08.2016 before S.B. Notice of stay application shall also be issued to the respondents for the date fixed. Till next date of hearing original order dated 11.5.2016 vide which appellant is serving as Lab. Attendant at the said school shall hold field.




Appellant Deposited  
Security & Process Fee

  
Chairman

Form- A  
FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No. 731/2016

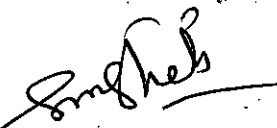
S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	19/07/2016	<p>The appeal of Mst. Samina Ameer resubmitted today by Noor Muhammad Khattak Advocate may be entered in the Institution Register and put up to Learned Member for proper order please.</p> <p> REGISTRAR</p>
2	20-7-16	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on. <u>21-7-16</u></p> <p> MEMBER</p>
	21.07.2016	<p>Mr. Noor Muhammad Khattak, Advocate has requested for adjournment. Request accepted. To come up for preliminary hearing on 25.07.2016.</p> <p> MEMBER</p>

The appeal of Mst. Samina Ameer Lab Attendant GGHS Shekhano Banda Mardan received to-day i.e. on 15.07.2016 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copies of orders dated 26.2.2013 and 17.8.2013 mentioned in para- 3 of the memo of appeal are not attached with the appeal which may be placed on it.
- 2- Annexures of the appeal may be attested.
- 3- Annexures of the appeal may be flagged.
- 4- Wakalat Nama may be placed on file.
- 5- Six more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1152/S.T,

Dt. 18/7/2016

*for*  
  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Noor Muhammad Khattak Adv. Pesh.

Sir,

That the orders dated 20.2.2013 and 17.8.2013 on the relevant page of Service book which ~~was~~ is annexed as annexure - D page 15, while the 2 to 5 have been removed, hence re-submitted today dated 19.7.2016.

19  
19/7/2016

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

APPEAL NO. 731 /2016

**SAMINA AMEER**

**VS**

**EDUCATION DEPTT:**

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**APPELLANT**

**THROUGH:**

  
**NOOR MOHAMMAD KHATTAK**  
**ADVOCATE**

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

Khyber Pakhtunkhwa  
Service Tribunal

APPEAL NO. 731 /2016

Diary No. 705

Mst: Samina Ameer, Lab Attendant, GGHS Shekhano Banda, Mardan under transfer to GGHS Shah Dhand Baba, Mardan on detailment basis ..... **APPELLANT** Dated 15/7/2016

**VERSUS**

- 1- The Govt: of KPK through Secretary E&SE Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director E&SE Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The District Education Officer (F), District Mardan.
- 4- The District Account Officer, District Mardan.

.....**RESPONDENTS**

**APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER DATED 6.7.2015 WHEREBY THE ADJUSTMENT ORDER OF THE APPELLANT ON HER ORIGINAL POST OF LAB ATTEDANT AT GGHS SHAH DHAND BABA WAS CONVERTED TO THAT OF DETAILMENT BASIS AND AGAINST THE INACTION OF THE RESPONDENTS BY NOT RELEASING THE MONTHLY SALARIES OF THE APPELLANT W.E.F. 1.5.2016 TILL DATE AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELALNT WITHIN THE STATUTORY PERIOD OF NINETY DAYS**

**PRAYER:**

That on acceptance of this appeal the impugned order dated 6.7.2015 may kindly be set aside and the order dated 11.5.2015 may kindly be restored. That the respondents may be directed to adjust the appellant on her original post of Lab Attendant at GGHS Shah Dhand Baba Mardan and the respondents may also further please be directed to release the monthly salaries of the appellant w.e.f. 1.5.2016 till date. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

**R/SHEWETH:**

**ON FACTS:**

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

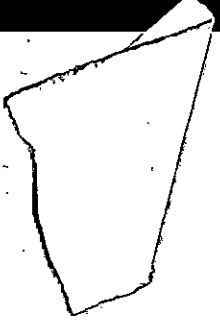
Filed to day  
15/7/16  
Registrar

Registrar

19/7/16



- 1-** That appellant is the bonafide resident of Village Gojar Garai Tehsil & District Mardan and belongs to a respectable family. That the appellant was appointed as Lab Attendant in the respondent Department on the proper recommendation of Departmental Selection Committee against the vacant post at GGHSS Shah Dhand Baba, Mardan vide order dated 19.4.1992. That in response to the appellant submitted her arrival report at the concerned station and started performing her duty as Lab Attendant quite efficiently and upto the entire satisfaction of her superiors. Copies of the appointment order and service book is attached as annexure..... **A and B.**
- 2-** That during service the appellant was transferred to GGHS Gujar Ghari against the post of Lab Attendant vide order dated 8.9.2004, wherein just after the lapse of five months the appellant was transferred to the office of EDO Mardan against the wrong post of Sweeper (BPS-1) vide order dated 22.2.2005. That unwantedly the appellant submitted her arrival report against the said wrong post of sweeper. Copies of the relevant page of service book and orders are attached as annexure..... **C.**
- 3-** That after serving for more than nine years on the wrong post of sweeper BPS-1 the appellant was adjusted on her original post of Lab Attendant at GGHS Sanga Ahamd Gul Kalay vide order dated 26.2.2013, wherein she was further transfer to GGHS Shekhano Banda Tehsil Takht Bhai vide order dated 17.8.2013. That it is pertinent to mention that appellant belongs to Tehsil & District Mardan wherein the station i.e. GGHS Shekhano Banda at situated in Tehsil Takht Bhai which is more than eighty kilometer away from her home station. Copies of the application, relevant pages of service book and order are attached as annexure..... **D.**
- 4-** That appellant time and again requested the concerned authorities for her transfer to her original place of posting i.e. GGHSS Shah Dhand Baba Mardan and lastly her request was exceeded vide order dated 7.8.2014 whereby the appellant was deputed to work as Lab attendant at GGHSS Shah Dhand Baba Mardan. That wherein the appellant was again disturbed from her original place of posting to that of GGHS Shekhano Banda Lund Khwar but again she was adjusted at her original place of posting vide order dated 1.11.2014. Copies of the orders are attached as annexure..... **E & F.**
- 5-** That again the appellant was transferred to GGHS Shekhano Banda but when the appellant submitted her arrival report the same was refused by the concerned head mistress on



the reason that the land owner of the said school give serious threats regarding not appointing his own person on

the said post. That in this regard the land owner of the said school also submitted complaint and the same was also acknowledged by the concerned head mistress. Copy of the complaint is attached as annexure.....**G.**

- 6- That again the appellant was transferred to her original place of posting i.e. GGHSS Shah Dhand Baba by the respondent No.3 vide order dated 11.5.2015, where after the appellant submitted her arrival report and started performing her duty quite efficiently and up to the entire satisfaction of her superiors. Copy of the order is attached as annexure.....**H.**
- 7- That vide order dated 6.7.2015 the respondent No.3 malafidely converted the transfer/adjustment order of the appellant as on detailment basis just for the reason to accommodate her blue eyed person through initial recruitment. That appellant feeling aggrieved filed Departmental appeal on 17.3.2016 but no response has been received so far. So much so in order to pressurize the appellant the respondent No.3 & 4 stopped the salaries of the appellant w.e.f. 1.5.2016 till date. Copies of the impugned order, service certificates and Departmental appeal are attached as annexure ..... **I, J and K.**
- 8- That appellant having no other remedy filed the instant appeal on the following grounds amongst the others. Copy of the Departmental appeal is attached as annexure.....**L.**

**GROUND:**

- A- That the impugned order dated 6.7.2015 is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.
- B- That appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That the respondents acted in arbitrary and malafide manner by not adjusting the appellant on her original post of Lab Attendant on regular basis.
- D- That action of the respondents squarely falls with in the violation of Clause-I and VIII of the transfer/posting policy

of the Provincial Government. Copy of the policy is attached as annexure.....L.

- E- That the impugned order dated 6.7.2015 has been issued by the respondents just to accommodate her blue eyed person on the said post.
- F- That the impugned order has not been passed in the interest of public service nor exigency of service, therefore not tenable and liable to be set aside.
- G- That the post held by appellant is her original post on which she was initially appointed in light of Appointment, promotion and transfer Rules 1989 but the respondents malafidely transferred the appellant to far flung areas of Tehsil Takht Bhai, wherein the appellant had served the respondents for more than twenty years.
- H- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore, most humbly prayed that the appeal of the appellant may be accepted as prayed for.

Dated: 14.7.2016

**APPELLANT**

*Samina Ameer*

**SAMINA AMEER**

**THROUGH:**

*N*  
**NOOR MOHAMMAD KHATTAK  
ADVOCATE**

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

Appeal No. \_\_\_\_\_/2016

**SAMINA AMEER**

**VS**

**EDU: DEPARTMENT**

**APPLICATION FOR RESTRAINING THE**  
**RESPONDENTS NOT TO FILL UP THE POST OF**  
**LAB ATTENDANT AT GGHSS SHAHDHAND BABA**  
**TILL THE DISPOSAL OF THE ABOVE**  
**MENTIONED APPEAL**

**R.SHEWETH:**

- 1- That the above mentioned appeal along with this application has been filed the appellant before this august service Tribunal in which no date has been fixed so far.
- 2- That appellant filed the above mentioned appeal against the impugned order dated 6.7.2015 whereby the adjustment order of the appellant on her original post of Lab Attendant at GGHSS Shah Dhand Baba was converted to that of Detailment basis in violation of transfer/ posting policy.
- 3- That all the three ingredients necessary for the saty is in favor of the appellant.
- 4- That the impugned order dated 6.7.2015 has been issued by the respondents in utter disregard of law and prevailing Rules.

It is therefore most humbly prayed that on acceptance of this application the respondents may kindly be restrained that not to fill up the post of Lab Attendant at GGHSS Shahdhand Baba, Mardan till the disposal of the above mentioned appeal.

Dated: 14.7.2016

**APPLICANT**

*Samina Amier*

**SAMINA AMEER**

**THROUGH:**

*Noor Mohammad Khattak*

**NOOR MOHAMMAD KHATTAK**  
**ADVOCATE**

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

**APPEAL NO. \_\_\_\_\_/2016**

**SAMINA AMEER**

**VS**

**EDUCATION DEPTT:**

**APPLICATION FOR CONDONATION OF**  
**DELAY IN FILING THE ABOVE NOTED**  
**APPEAL**

**R.SHEWETH:**

- 1- That the appellant has filed an appeal along with this application in which no date has been fixed so far.
- 2- That the appellant prays for the condonation of delay in filing the above noted appeal inter alia on the following grounds:

**GROUND OF APPLICATION:**

A- That valuable rights of the appellant are involved in the case hence the appeal deserve to decide on merit.

B- That it has been the consistent view of the Superior Courts that cases should be decided on merit rather on technicalities including the limitation. The same is reported in 2004 PLC (CS) 1014 and 2003 PLC (CS) 76.

It is therefore prayed that on acceptance of this application the delay in filing the above noted appeal may please be condoned.

**APPELLANT**

**SAMINA AMEER**

**THROUGH:**

  
**NOOR MOHAMMAD KHATTAK**  
**ADVOCATE**

OFFICE OF THE PRINCIPAL GOVT GIRLS HIGHER SECONDARY(S) SHAHDAND BABA MARDAN.

A-7

APPOINTMENT.

Appointment of the following persons is/are hereby ordered against the post of Lab-Attendant. on temporary and adhoc basis at Rs. 920/-M. plus usual allowance as admissible under the rules in B.P.S.(1) Gde. No. 920-26-1310 / at the institutions noted against each Name.

S.No.	Name/Qualification & Address.	Posted at	Remarks.
1:-	Nisakat D/O Jamshid B/O Firshah said (Mardan)	GHS, Shahdand baba Mardan.	against newly Created post.
2:-	Rahela D/O Inyatullah Moh: Hazi / khel, (Hoti) Mardan.	--do--	--do--
3:-	Sajina D/O Amiruddin B/O Far Hoti (Mardan)	--do--	--do--

TERMS AND CONDITIONS.


- 1:- their appointments are purely temporary and liable to termination and time with cut any assigning/reasons or notices.
- 2:- In case of resignation they shall have to submit one month's prior notice to the department or foreign one month's pay in lieu thereof to the Govt.
- 3:- They are required to produce Health and age Certificate for the Medical Authorities concerned before taking over charges provide they are not in Government service.
- 4:- They should not be allowed to take over charges if his/her their age is less than 18 years or above.
- 5:- his/her/their appointment is/are subject to further condition that he/she/they are Domicile of NUT.
- 6:- His/Her/Their antecedents form should be obtained duly Verified by the local police authorities and submit to this office together with application for appointment on prescribed form and under taking declaration of moveable and immoveable property for record in this office.
- 7:- All Educational character and Domicile certificate should be thoroughly checked before handing over charge if necessary it should be verified from the institutions concerned.
- 8:- If He/She/they fails to take over charges of the post within a week of appointment shall stand cancelled.
- 9:- Charge report should be submitted to all concerned.
- 10:- No TA/DA/FG etc is allowed.

(MRS: NISHAT FARVEEN)  
1/O PRINCIPAL GOVT GIRLS HIGHER SECONDARY SCHOOL SHAHDAND BABA (MARDAN).

Sl. No. 116-20 / Class iv: Date the 13-4-1992.

Cony forwarded for information & necessary action pl. to

- 1; District Education (Female) Secondary Mardan
- 2; Divisional Director of Education (Schools) Mardan Div: Mardan w.r. letter No. 10484 dated the 12.4.1992.
- 3; Candidate concerned.

  
PRINCIPAL,  
GOVT GIRLS HIGHER SECONDARY (SCHOOL)  
SHAHDAND BABA MARDAN.

Asis Gul

Handwritten notes at the top right of the page, including a date and some illegible text.

Main body of handwritten text in the upper section, consisting of several lines of cursive script.

Main body of handwritten text in the middle section, continuing the cursive script.

Main body of handwritten text in the lower section, including a signature and some concluding notes.

(For use in Police Department only).

B-8  
B  
A

Heirs,

Passed SSC Examination from  
BISE Peshawar under Roll No.  
992 year 1989 obtained marks  
389/850. *Shameela Durrani*

- 1.
- 2.
- 3.

Verification Roll No. \_\_\_\_\_ dated \_\_\_\_\_

PRINCIPAL  
Govt. Girls H. S. Secy  
School, Shah Dhand Baba  
received back *[Signature]*

Left thumb-impression.

Qualification	Date	Qualifications	Date
English		First Arts	
Pashtu		B. L. or B. A.	
Urdu		Pleadership examination	
Plan-drawing		Training School Final examination	
Finger print		Other qualifications—	
Drill instructing			
Court duties			
Reserve duties			

ATTESTED

*[Signature]*

N. B.—Line to be drawn under the qualification possessed.



Note:—The entries in this page should be renewed or re-attested at least every five years and the signature to lines 9 and 10 should be dated.

1. Name MISS SAMINA  
2. Race (Afghan Pakistan)  
3. Residence Par Hai Mardan

4. Father's name and residence Amirud-Din

5. Date of birth by Christian era as nearly as can be ascertained 04-06-1973

6. Exact height by measurement 5'1"

7. Personal marks for identification Black mole on the Lt. Tom

8. Left hand thumb and Finger impression of (non-gazetted) officer

Little Finger. [Impression] Ring Finger [Impression]  
Middle Finger. [Impression] Fore Finger [Impression]  
Thumb. [Impression]

ATTESTED

9. Signature of Government servant. [Signature]

10. Signature and designation of the Head of the Office, or other Attesting Officer. [Signature] Principal G.O.H.S.S. Shabbar Baba Mardan

1350  
1315  
/ 95

10

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature of Government servant
<u>Lab. Attendant</u>			920/-	✓		19-4 (FN) 42	Sameer
			946/-	✓		1-12 92	Sameer
<u>Crane Receiver</u>			972/-	✓		1-12 93	Sameer
1245-35-1770			1350/-	1315/-		1-6 94	Sameer
			1385/-	1350/-		1-12 94	Sameer
			1420/-	1385/-		1-12 95	Sameer
Office of The Accountant General, M.V.P. Pachawar		✓		Note		Tax on pay H. would may be recovered.	
Pay fixed in the revised basic pay scales, 1994 of Rs 1245-35-1770... (B. I. ✓)		✓		R. 35/- pr. 6/94 to 7/96 R. 910/-			
@ Rs 1315/- P.M.W.E.F. 1-6-1994 with next increment on 1-12-1994		✓					
Accounts Office, Pay Fixation Party MWFP, Pachawar		A				Noted / Subj. party H/Os / H/Os	
				ATTESTED			
				[Signature]			

9	10	11	12	13		14	15
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
				Period	Government to which debitable		
<i>Immeda</i> Principal, G.G.H.S.S. Shabdand Baba Mardan.		<i>Immeda</i> Principal, G.G.H.S.S. Shabdand Baba Mardan.					<p>Appointed as Lab. Alhidul Part Grad R. 920-26-1310 BPS NO I against newly Sanction Part Under this offer Endst No. 116-20 Date Mardan 13-4-1992.</p> <p><i>Immeda</i> Principal, G.G.H.S.S. Shabdand Baba Mardan.</p> <p>Service with effect from 19<sup>9</sup> 30<sup>11</sup> 92 to 30<sup>11</sup> 93</p> <p>Verified from the my. H. R. Reels &amp; office Records maintained in the office.</p> <p><i>Immeda</i> Principal, G.G.H.S.S. Shabdand Baba Mardan.</p> <p>①</p> <p>Granted medical leave in E.O. of 24-4-95 &amp; 30-4-95 - 7 days on full pay Sanction vide this office Endst No. 143-144 dated 26-4-95</p> <p><i>Immeda</i> Principal, G.G.H.S.S. Shabdand Baba Mardan.</p> <p>Services verified w/c 1-23 to 30-11-95 from the Agency roll out of him reamed mentioned in the office</p> <p><i>Immeda</i> Principal, G.G.H.S.S. Shabdand Baba Mardan.</p>
<i>Immeda</i> Principal, G.G.H.S.S. Shabdand Baba Mardan.		<i>Immeda</i> Principal, G.G.H.S.S. Shabdand Baba Mardan.					
<i>Immeda</i> Principal, G.G.H.S.S. Shabdand Baba Mardan.		<i>Immeda</i> Principal, G.G.H.S.S. Shabdand Baba Mardan.					
<i>Immeda</i> Principal, G.G.H.S.S. Shabdand Baba Mardan.		<i>Immeda</i> Principal, G.G.H.S.S. Shabdand Baba Mardan.					
<i>Immeda</i> Principal, G.G.H.S.S. Shabdand Baba Mardan.		<i>Immeda</i> Principal, G.G.H.S.S. Shabdand Baba Mardan.					

ATTESTED

*Immeda*

11

(12)

C-12  
B-12

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature of Government servant
Latiff EGHS, GUJAR-SARHI			Rs 2640/- PM		9 <sup>8</sup> / <sub>2004</sub>		Ganica
do		2585	Rs 2695/- PM		1 <sup>12</sup> / <sub>2004</sub>		Ganica
Sweeper office E.D. Sarh Mardan			Rs 2695/- PM		23 <sup>2</sup> / <sub>2005</sub>		Ganica
do		R. BPS A10 P (R=2150-65-4100)					
do		2895	Rs 3125/- PM		1 <sup>7</sup> / <sub>05</sub>	✓	Ganica
do		2060	Rs 3190/- PM		1 <sup>12</sup> / <sub>2005</sub>		Ganica
<p><b>2005</b>  OFFICE OF THE ACCOUNTANT GENERAL  N.W.F.P. PESHAWAR  PAY FIXED IN THE REVISED BASIC  PAY SCALES  OF RS 2150-65-4100  AT RS 2985/- P.M.W.E.F. 1-07-2005  With Next Increment on 1-12-2005</p>							
<p>Accounts Officer  Pay Fixation Party N.W.F.P. Peshawar</p>							
Sweeper EGHS Land Mardan		3125	Rs 3190/- PM		1 <sup>12</sup> / <sub>2006</sub>		Ganica

ATTESTED

*[Signature]*

OFFICE OF THE EXECUTIVE DISTRICT OFFICER SCHOOLS & LITERACY MARDAN.

Mutual Transfer.

13

Consequent upon approval of the competent authority i.e., D.C.O. Mardan Mutual Transfer of the following Class IV servants is hereby ordered on their own pay and grade with immediate effect in the interest of public service as per detail given below.

S/No.	Name/Designation.	From.	To.	Remarks.
1.	Lal Badar, Sweeper.	O/O, E.D.O. S & L: Mardan.	GGHS, Gujar Garhi (MNO)	V.S.No.2
2.	Gemina Amir, Lab/Att:	GGHS, Gujar Garhi.	O/O, E.D.O. S & L: M.	V.S.No.1

Note:- TA DA is not allowed to any one.

Charge report should be submitted to all concerned.

DA-  
for  
2/2  
2/5

EXECUTIVE DISTRICT OFFICER  
SCHOOLS & LITERACY MARDAN.

Exist:No. 955-58 / Dated Mardan the, 22 / 2 / 2005.

Copy forwarded to the:-

1. PA, to D.C.O. Mardan.
2. District Accounts Officer Mardan.
3. H/M: GGHS, Gujar Garhi.
4. Official Concerned.

DISTRICT OFFICER (FISCAL)  
SCHOOLS & LITERACY MARDAN

14

ORDER OF THE DISTRICT OFFICER (GENERAL) SCHOOLS AND LIT: MARDAN

TRANSFER ORDER.

The transfer/adjustment of the following staff members has been ordered on their own pay and EPS the staff will be posted again soon in the interest of public service.

S.No.	Name/Posig:	From	To	Remarks.
1.	Samina Amir, sweep:	10(P)Mardan	under transfer to 10(P) Rahmi Khai	is hereby adjusted to CGHS, Lund Khwar. V.S.No.1.
2.	Samina Amir, sweep:	CGHS, Lund Khwar	10(P)Mardan.	V.S.No.1.

1. Charge report should be submitted to all concerned.
2. PC/TA/DA is allowed.

(SALIM AHAMMAD KHAN)  
DISTRICT OFFICER (GENERAL) SCHOOLS AND LIT: MARDAN.

ORDER NO. 14824-26/DADET 22/9/2006

1. District Account Office Mardan.
2. Head Mistress, Girls, Lund Khwar.
3. S.O. Local Office.

*[Signature]*  
DISTRICT OFFICER (GENERAL) SCHOOLS AND LIT: MARDAN.

22/9/06

*[Large handwritten signature]*

*[Signature]*  
Head Mistress  
Govt. Girls High School  
Lundkhwar Mardan.

*[Handwritten signature]*

D-15  
10-10

1	2	3	4	5	6	7	8
Name of Post	Whether substantive or officiating and whether permanent or temporary.	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional pay for officiating	Other emolument falling under the term "pay"	Date of Appointment	Signature of Government servant
B.P. SN02 Lab/Att		BPS 2	Rs (4900 - 170 - 10000)				
G.G. H.S Sanga (Ahmed and Kill)	+		Rs:	8640/-		26 <sup>02</sup> / <sub>2013</sub> (F/N)	
C.G.H.S Sheikhanu Banda	+			Rs. 8640/-		17 <sup>03</sup> / <sub>13</sub>	
do	-	-		Rs. 8810/-		1 <sup>12</sup> / <sub>13</sub>	
do	-	-		Rs. 8980/-		01 <sup>07</sup> / <sub>2014</sub>	
				18/11/14 Naseem HEAD MISTRESS GGHS SHEIKHANU BANDA LUND, KHWAR MARDAN			
				Pay 2/25 11/12			Pay 3/213 10/13/13
				9150/-		1 <sup>12</sup> / <sub>2014</sub>	
				(3/12/14)			

ATTESTED

[Signature]

M/S 317  
6/11

Sum in of pay + 10%  
- y to A. 82293/ Q.  
in 8980/ 9150/-, out 1<sup>12</sup>/<sub>2014</sub> 6282  
lim, 4/12/14 on ad BPS out-2

9	10	11	12	13 Leave		14	15
Nature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer:	Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government	Signature of the head of the office or other attesting officer.	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
					Period	Government to which debitable	
<p>Head Mistress G.G.H.S Sanga (Ahmad Gul Kani) Mardan</p>	<p>16/8/13</p>	<p>Transfer to G.G.H.S Sheikhano Banda</p>	<p>Head Mistress G.G.H.S Sanga (Ahmad Gul Kani) Mardan</p>		<p>Medical Leave w.e.f 25/3 to 29/3 (5 days) on full pay sanctioned vide Distt. Ed. Officer (F) Mardan Bd. No. 1899-1901/PF dt. 15.5.2013</p>	<p>Head Mistress G.G.H.S Sanga (Ahmad Gul Kani) Mardan</p>	<p>25/3 to 29/3</p>
<p>Head Mistress G.G.H.S Sheikhano Banda</p>	<p>30/11/2013</p>	<p>A/gnc</p>	<p>Head Mistress G.G.H.S Sheikhano Banda Lundkhwar (MDN)</p>			<p>Service verified w.e.f 26/02/2013 to 16/08/2013 from the relevant record of this office.</p>	
<p>Head Mistress G.G.H.S Sheikhano Banda Lundkhwar (MDN)</p>	<p>30/06/2014</p>	<p>P/Motorist Increment</p>	<p>Head Mistress G.G.H.S Sheikhano Banda Lundkhwar (MDN)</p>			<p>Head Mistress G.G.H.S Sanga (Ahmad Gul Kani) Mardan</p>	
<p>Head Mistress G.G.H.S Sheikhano Banda Lundkhwar (MDN)</p>			<p>Head Mistress G.G.H.S Sheikhano Banda Lundkhwar (MDN)</p>			<p>Head Mistress G.G.H.S Sanga (Ahmad Gul Kani) Mardan</p>	
<p>Head Mistress G.G.H.S Sheikhano Banda Lundkhwar (MDN)</p>	<p>Awarded one Pre-mature Increment w.e.f 01-07-2014 vide Notification No. FD(SOSR-1)2-128/2014 Dated 14/07/2014</p>		<p>Head Mistress G.G.H.S Sheikhano Banda Lundkhwar (MDN)</p>		<p>MF 234 7/10/13</p>	<p>Head Mistress G.G.H.S Sanga (Ahmad Gul Kani) Mardan</p>	
<p>Head Mistress G.G.H.S Sheikhano Banda Lundkhwar (MDN)</p>	<p>19/11/14</p>		<p>Head Mistress G.G.H.S Sheikhano Banda Lundkhwar (MDN)</p>		<p>MF 85 11/10/14</p>	<p>Head Mistress G.G.H.S Sanga (Ahmad Gul Kani) Mardan</p>	
<p>Head Mistress G.G.H.S Sheikhano Banda Lundkhwar (MDN)</p>	<p>12/3/15</p>		<p>Head Mistress G.G.H.S Sheikhano Banda Lundkhwar (MDN)</p>		<p>MF 85 11/10/14</p>	<p>Head Mistress G.G.H.S Sanga (Ahmad Gul Kani) Mardan</p>	
<p>Head Mistress G.G.H.S Sheikhano Banda Lundkhwar (MDN)</p>	<p>12/3/15</p>		<p>Head Mistress G.G.H.S Sheikhano Banda Lundkhwar (MDN)</p>		<p>MF 85 11/10/14</p>	<p>Head Mistress G.G.H.S Sanga (Ahmad Gul Kani) Mardan</p>	
<p>Head Mistress G.G.H.S Sheikhano Banda Lundkhwar (MDN)</p>	<p>12/3/15</p>		<p>Head Mistress G.G.H.S Sheikhano Banda Lundkhwar (MDN)</p>		<p>MF 85 11/10/14</p>	<p>Head Mistress G.G.H.S Sanga (Ahmad Gul Kani) Mardan</p>	
<p>Head Mistress G.G.H.S Sheikhano Banda Lundkhwar (MDN)</p>	<p>12/3/15</p>		<p>Head Mistress G.G.H.S Sheikhano Banda Lundkhwar (MDN)</p>		<p>MF 85 11/10/14</p>	<p>Head Mistress G.G.H.S Sanga (Ahmad Gul Kani) Mardan</p>	
<p>Head Mistress G.G.H.S Sheikhano Banda Lundkhwar (MDN)</p>	<p>12/3/15</p>		<p>Head Mistress G.G.H.S Sheikhano Banda Lundkhwar (MDN)</p>		<p>MF 85 11/10/14</p>	<p>Head Mistress G.G.H.S Sanga (Ahmad Gul Kani) Mardan</p>	
<p>Head Mistress G.G.H.S Sheikhano Banda Lundkhwar (MDN)</p>	<p>12/3/15</p>		<p>Head Mistress G.G.H.S Sheikhano Banda Lundkhwar (MDN)</p>		<p>MF 85 11/10/14</p>	<p>Head Mistress G.G.H.S Sanga (Ahmad Gul Kani) Mardan</p>	
<p>Head Mistress G.G.H.S Sheikhano Banda Lundkhwar (MDN)</p>	<p>12/3/15</p>		<p>Head Mistress G.G.H.S Sheikhano Banda Lundkhwar (MDN)</p>		<p>MF 85 11/10/14</p>	<p>Head Mistress G.G.H.S Sanga (Ahmad Gul Kani) Mardan</p>	

ATTESTED

Head Mistress  
G.G.H.S  
Sanga (Ahmad Gul Kani)

Allowed Medical leave w.e.f 03/05/2013 to 31/05/2013 (28 day) on full pay vide D.E.O(F) Mardan office Ends: No: 3941/ Dated 03/01/2014



OFFICE OF THE EXECUTIVE DISTRICT OFFICER,  
ELEMENTARY AND SECONDARY EDUCATION MARDAN.  
No. 2067/P.F.MST SAMEENA SWP/DT 15/2 2011

To- The District Accounts Office, (17)  
Mardan.

SUB:- AJUSTMENT AGAINST LABORTARY POST.

Memo:-

It is submitted that one Mst Sameena Was appointed against Lab:Attendent post on 19-4-1992 at GGHS Shah Dand Baha Mardan. Later on She was adjusted against Sweeper Post in the Office of the District Officer (F) ~~Mardan~~ undersigned on 22-2-2005.

Subsequently She was transferred to GGHS Lund Khwar Mardan against Sweeper Post on ~~17~~- 1-7-2006

Since 3-4 years, the Finance Department is not agreed upon the change of cadre of C/IV servants while in the post there was no restriction.

But now the above named Class IV has made an appeal that She may be adjusted against the Lab.Attendent post.

Please let this Office guidance as the whether this Office can adjust against the Lab.Attendent post or otherwise.

KH.MIR

  
EXECUTIVE DISTRICT OFFICER,  
E & SECY: EDUCATION MARDAN.

TRANSFERS ORDER.

18

Mst Samina Amir Sweeper Govt. Girls High School Lund Khwar Mardan is hereby transferred to Govt. Girls High School Ahmad Gul Killi Sanga Mardan against vacant Lab. Attendant post. (She was already on Lab. Attendant post) on her own pay and grade in the interest of public service with immediate effect.

No TA/DA is allowed.

Charge report should be sent to all concerned

( ATTIA SULTANA )  
DISTRICT EDUCATION OFFICER,  
(FEMALE) SECONDARY MARDAN.

Enclt. No. 571-73 / P.F. RST SAMINA AMIR SWP DATED 2/21 2013

Copy forwarded to the:-

1. Head Mistress GGHS Lund Khwar Mardan.
2. Head Mistress GGHS Ahmad Gul Killi Sanga Mardan.
3. District Accounts Office Mardan.

KH. MIR

*Attia*  
*02-02-13*  
DISTRICT EDUCATION OFFICER,  
(FEMALE) SECONDARY MARDAN.



~~D~~ (E) E-19

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MARDAN

PHONE/FAX NO. 0937-9230150

Email Address: emismardand\_deofemale @Yahoo.com

NOTIFICATION.

The absent period with effect from 21.04.2015 to 10.05.2015 (20 days) in respect of Mrs: Samina Ameer Lab:Attended GGHS Sheikhanu Banda is hereby considered leave with out pay and she is hereby deputed to work at GGHS Shahdand Baba Mardan on need base till further order.

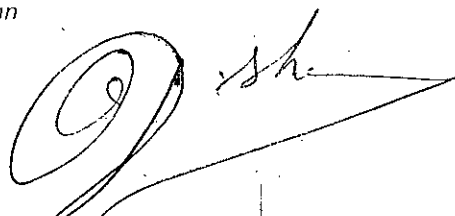
(DILSHAD BEGUM)  
DISTRICT EDUCATION OFFICER  
(FEMALE)MARDAN.

Endst;No 6034-36 /DDO

Dated Mardan the 7/8 /2014

Copy forwarded to the:-

1. Principal GGHS Shahdand Baba Mardan.
2. Head Mistress GGHS Sheikhanu Banda Mardan
3. Samina Ameer Lab:Attended.

  
DISTRICT EDUCATION OFFICER  
(FEMALE)MARDAN

ATTESTED





OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MARDAN

PHONE/FAX NO. 0937-9230150

Email Address: emismardan\_decofemale@yahoo.com

F-20

F-20

DUTY PERFORMANCE

Samina Lab:/Att:GGHS,Sheikhano Banda(Lund Khwar)is hereby allowed to perform her duty in the office of the undersigned to enmity in her original School till further order in the interest of public service.

(*Dilshad Begum*)

DISTRICT EDUCATION OFFICER  
(FEMALE) MARDAN

Endst:No 6031 /File/ Dated 07/01/2014

1. Head Mistress GGHS,Sheikhano Banda Lund Khwar (Mardan)..
2. District Accounts Officer, Mardan.

*[Signature]*  
DISTRICT EDUCATION OFFICER  
(FEMALE) MARDAN

**ATTESTED**

*[Signature]*

21- حضرت جناب ڈسٹرکٹ ایجوکیشن آفیسر صاحبہ (زمانہ) صلوات

(SAVE TRANSFER)

جناب عالی!

گزارش کی جاتی ہے کہ سمنہ ولد امیر الدین جو گورنمنٹ گرلز ہائی سکول شیخانو بانڈہ لیبارٹری اسٹنڈرڈ پوسٹ پر اسی مدرسہ لقیات کی بی بی وہ اختر عزیز صاحبہ ہوتی ہے جو تھمہ علاقہ میں قسما قسم واردات واقع ہوتے ہیں اور یہ عورت ہے۔ اسلئے اسکو بھی ایسے واقعات پیش کئے ہیں۔

علاوہ ازیں ہم نے سکول کو آف جیرب جگم اس شرط پر دیا ہے کہ اس سکول میں ہفتہ کلاس فور بھرتی ہونے وہ بی بی خانمان ہی سے بھرتی ہوئے۔

بہذا یہ بیمار احسن تلفی ہے۔  
میر بانی کے اسکو ہمیں نزدیک بڑا سفر کیا جائے۔  
ڈسٹرکٹ ایجوکیشن آفیسر صاحبہ والد امیر الدین کو آف جانی نقصان حلا تو حلیمہ اسکا

16102-4357259

16102-6207230-3

19/5/15

24/4/2015

العارض

آپ کا طالب اعجاز احمد ولد الوب خان سکندر ریدی بابا گورنمنٹ گرلز ہائی سکول شیخانو بانڈہ (لوند فوٹ)

The application is based upon

16102-933089-5

truth and is forwarded for further

Mohit

no please

16102-2267651-5  
K. Alam

HEAD MISTRESS  
G.G.H.S Sheikhnac  
Banda Lunckhwar (MDN)  
24-04-2015

16102-6207230-3  
Muhammad Adeel  
S/o: Insan ullah.

5.5.15

0303840809  
⑤  
15/4



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MARDAN

PHONE/FAX NO. 0937-9230150

Email Address: emismardand\_deofemale@yahoo.com

6  
⑤-⑩

H-22

**ADJUSTMENT/TRANSFER ORDER**

The Adjustment/transfer of the following Lab Attendant is hereby ordered in her own pay and BPS, to the schools noted against her in the interest of public service as detail given below:

S. No.	Name of Teacher	From	To	Remarks
1	Samina Lab: Attendant	GGHS Sheikhano Banda	GGHSS Shah Dhand Baba ✓	A.V.P

**Note:** No. TA/DA is allowed

Charge Report should be submitted to all concerned.

(DILSHAD BEGUM)  
DISTRICT EDUCATION OFFICER,  
FEMALE MARDAN.

Endst. No. 3427-30 / G dated Mardan the 11/5 /2015

Copy forwarded to the:-

1. District Account Officer Mardan.
2. Principal/Head Mistress of the School concerned ✓
3. Teachers concerned ✓
4. Personal File.

3.3  
10/5/15  
CC

  
DISTRICT EDUCATION OFFICER,  
FEMALE MARDAN

ATTESTED



Attester signed



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MARDAN  
PHONE/FAX NO. 0937-9230150

Email Address: emismardand\_deofemale @Yahoo.com

I-23

NOTIFICATION

Mst. Samina Ameer Lab: Attended GGHS, Shikhano Banda Mardan is hereby deputed to work at GGHSS Shahdand Baba Mardan on need base till further order and she will draw her pay on her old station/original school in the interest of public service.

(DILSHAD BEGUM)  
DISTRICT EDUCATION OFFICER  
(FEMALE) MARDAN.

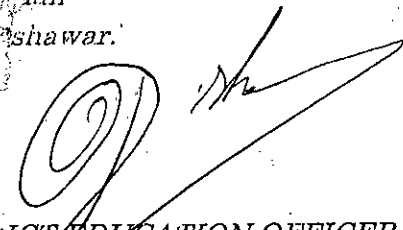
536-28

Endst: No \_\_\_\_\_ /Deputation Class IV.

Dated Mardan the 6/7 /2015

Copy forwarded to the:-

1. Principal GGHS Shikhano Banda Mardan
2. Principal GGHSS Shahdand Baba Mardan
3. PA to Minister for Education K.P.K. Peshawar.

  
DISTRICT EDUCATION OFFICER  
(FEMALE) MARDAN.

ATTESTED







Office of the Principal GGHSS Shahdand Baba Mardan  
گورنمنٹ گرلز ہائر سیکنڈری سکول شاہ دندہ بابا مردان

(24)

J-24

**Duty Certificate**

It is certified that Mrs. Samina Laboratory Attendant GGHS sheikhano Banda Mardan has been deputed to this School, vide District Education officer (Female) Mardan Endorsment Number 3427-30 dated 11-05-2015, she is performing her duty in this School, regularly from 11-05-2015 till date.

Principal  
GGHSS, Shahdand Baba Mardan  
PRINCIPAL  
G.G.H.S.S Shah Danu Baba  
Mardan

ATTESTED

(Signature)

Office of the Principal Government Girls Higher Secondary School  
Shahdand Baba Mardan


Duty Certificate

It is to certify that Mrs. Samina Laboratory Attendant GGHS Sheikhano Banda Mardan has been Transferred/Adjusted in this School vide District Education Officer Female Endorsement Number 3427-30 dated 11/5/2015 but there was no vacant post of Lab/ Attendant. Therefore She was deputed vide Notification Endorsement Number 5536-38 dated 6/7/2015.

It is further certified that she is performing her duty in this School after her deputation. (From 11-05-2015 till date.)

Principal  
GGHSS  
Shahdand Baba Mardan

ATTESTED



(29) (25)

D.A. concerned  
Put up on file and  
specify p1.  
29/9/15

خدمت جناب ڈسٹرکٹ ایجوکیشن آفیسر (فی صلی)

ڈسٹرکٹ سروان

26-K

جناب عالیہ!

گزارش ہے کہ میں مردان کی مستقل باشندہ ہوں اور

صرفہ دس سال سے لوڈ فور کے مختلف علاقوں میں بطور لیب ایڈمنڈ

ڈیوٹی انجام دے رہی ہوں۔ اب موجودہ میں جس سکول میں ڈیوٹی انجام دے رہی

ہوں۔ وہ کسی کی ذاتی ملکیت ہے۔ وہ لوگ مجھے وہاں ڈیوٹی کرنے نہیں دیتے اور

میراثی اور روز سکول سے واپس۔ آپ صاحبان عدلیہ ٹرانسفر ڈسٹرکٹ مردان

کے کسی سکول میں کریں۔ سب سے بانی ہوگی!

میری گزارش ہوگی!

ATTESTED



علیہ آفیسر، لیب ایڈمنڈ

Afsar Khan  
15/3/16

گورنمنٹ ٹرانسپارٹ سکول شیخا لوبانڈہ لوڈ فور

D.E.O. (Female), Mardan  
Dairy No 2552  
Date: 17/3/16

Date:

15-3-2015



**GOVERNMENT OF NWFP  
ESTABLISHMENT & ADMINISTRATION  
DEPARTMENT  
(Regulation Wing)**

**POSTING / TRANSFER POLICY OF THE PROVINCIAL GOVERNMENT.**

- i) All the posting/transfers shall be strictly in public interest and shall not be abused/misused to victimize the Government servants
- ii) All Government servants are prohibited to exert political, Administrative or any other pressures upon the posting/transfer authorities for seeking posing/transfers of their choice and against the public interest.
- iii) All contract Government employees appointed against specific posts, can not be posted against any other post.
- iv) The normal tenure of posting shall be three years subject to the condition that for the officers/officials posted in unattractive areas the tenure shall be two years and for the hard areas the tenure shall be one year. The unattractive and hard areas will be notified by the Government.
- v) { }
- vi) While making postings/transfer from settled areas to FATA and vice-versa, specific approval of Governor, NWFP needs to be obtained  
  
<sup>2</sup>While making postings/transfers of officers/officials up to BS-17, from settled areas to FATA and vice-versa approval of the Chief Secretary NWFP needs to be obtained. Whereas, in case of posting/transfer of officers in BS-18 and above, from settled areas to FATA and vice versa, specific approval of the Governor NWFP shall be obtained.
- vi (a) All Officers/officials selected against Zone-I/FATA quota in the Provincial Services should compulsorily serve in FATA for atleast eighteen months in each grade. This should start from senior most scales/grades downwards in each scale/grade of each cadre.
- vii) Officers may be posted on executive/administrative posts in the Districts of their domicile except District Coordination Officers (D.C.Os) and DPOs/Superintendent of Police (SP). Similarly Deputy Superintendent of Police (DSP) shall not be posted at a place where the Police Station (Thaana) of his area/residence is situated.
- viii) No posting/transfers of the officer's/officials on detailment basis shall be made.
- ix) Regarding the posting of husband/wife, both in Provincial services, efforts where possible would be made to post such persons at one station subject to the public interest.
- x) All the posting/transferring authorities may facilitate the posting/transfer of the unmarried female government Servants at the station of the residence of their parents.

<sup>1</sup> Para-1(v) regarding months of March and July for posting/transfer and authorities for relaxation of ban deleted vide letter No: SOR-VI (E&AD) 1-4/2008/Vol-VI, dated 3-6-2008. Consequently authorities competent under the NWFP Government Rules of Business, 1985, District Government Rules of Business 2001, Posting/Transfer Policy and other rules for the time being in force, allowed to make posting/transfer subject to observance of the policy and rules.  
<sup>2</sup> Added vide Urdu circular letter No. SOR-VI(E&AD)1-4/2003, dated 21-09-2004

ATTES  
[Signature]

- xi) Officers/officials except DCOs and DPOs/SPs who are due to retire within one year may be posted on their option on posts in the Districts of their domicile and be allowed to serve there till the retirement  
<sup>1</sup>DCOs and DPOs who are due to retire in the near future may also be posted in the District of their domicile subject to the condition that such posting would be against non-administrative posts of equivalent scales;
- xii) In terms of Rule-17(1) and (2) read with Schedule-III of the NWFP Government Rules of Business 1985, transfer of officers shown in column 1 of the following table shall be made by the authorities shown against each officer in column 2 thereof:

Outside the Secretariat		
1.	Officers of the all Pakistan Unified Group i.e. DMG, PSP including Provincial Police Officers in BPS-18 and above.	Chief Secretary in consultation with Establishment Department and Department concerned with the approval of the Chief Minister.
2.	Other officers in BPS-17 and above to be posted against scheduled posts, or posts normally held by the APUG, PCS(EG) and PCS(SG).	-do-
3.	Heads of Attached Departments and other Officers in B-19 & above in all the Departments.	-do-
In the Secretariat		
1.	Secretaries	Chief Secretary with the approval of the Chief Minister.
2.	Other Officers of and above the rank of Section Officers: a) Within the Same Department b) Within the Secretariat from one Department to another.	Secretary of the Department concerned. Chief secretary/Secretary Establishment.
3.	Officials up to the rank of Superintendent: a) Within the same Department b) To and from an Attached Department c) Within the Secretariat from one Department to another	Secretary of the Department concerned. Secretary of the Dept in consultation with Head of Attached Department concerned. Secretary (Establishment)

- xiii) While considering posting/transfer proposals all the concerned authorities shall keep in mind the following:
- a) To ensure the posting of proper persons on proper posts, the Performance Evaluation Report/annual confidential reports, past and present record of service, performance on post held presently and in the past and general reputation with focus on the integrity of the concerned officers/officials be considered.
  - b) Tenure on present post shall also be taken into consideration and the posting/transfers shall be in the best public interest.

<sup>1</sup> Added vide Urdu circular letter No: SOR-VI (E&AD)/1-4/2005, dated 9-9-2005.

**ATTESTED**  
M  
A

xiv) Government servants including District Govt. employees feeling aggrieved due to the orders of posting/transfer authorities may seek remedy from the next higher authority / the appointing authority as the case may be through an appeal to be submitted within seven days of the receipt of such orders. Such appeal shall be disposed of within fifteen days. The option of appeal against posting/ transfer orders could be exercised only in the following cases.

- i) Pre-mature posing/transfer or posting transfer in violation of the provisions of this policy.
- ii) Serious and grave personal (humanitarian) grounds.

2. To streamline the postings/transfers in the District Government and to remove any irritant/confusions in this regard the provision of Rule 25 of the North West Frontier Province District Government Rules of Business 2001 read with schedule – IV thereof is referred. As per schedule-IV the posting/transferring authorities for the officers/officials shown against each are as under:-

S. No.	Officers	Authority
1.	Posting of District Coordination Officer and Executive District Officer in a District.	Provincial Government.
2.	Posting of District Police Officer.	Provincial Government
3.	Other Officers in BPS-17 and above posted in the District.	Provincial Government
4.	Official in BPS-16 and below	Executive District Officer in consultation with District Coordination Officer.

3. As per Rule 25(2) of the Rules mentioned above the District Coordination Department shall consult the Government if it is proposed to:

- a) Transfer the holder of a tenure post before the completion of his tenure or extend the period of his tenure.
- b) Require an officer to hold charge of more than one post for a period exceeding two months.

4. I am further directed to request that the above noted policy may be strictly observed /implemented.

.....

All concerned are requested to ensure that tenures of the concerned officers/officials are invariably mentioned in summaries submitted to the Competent Authorities for Posting/Transfer.

{*Authority: Latter No: SOR-VI/E&AD/1-4/2003 dated 24-6-2003*}.

.....

It has been decided by the Provincial Government that posting/transfer orders of all the officers up to BS-19 except Heads of Attached Departments irrespective of grades will be notified by the concerned Administrative Departments with prior approval of the Competent Authority obtained on the Summary. The Notifications/orders should be issued as per specimen given below for guidance.

All posting/transfer orders of BS-20 and above and Heads of Attached Departments (HAD) shall be issued by the Establishment Department and the Administrative Departments shall send approved Summaries to E&A Department for issuance of Notifications.

ATTESTED

**VAKALATNAMA**

IN THE COURT OF KPK Service Tribunal Peshawar

OF 2016.

Samina Ameer

(APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

**VERSUS**

Education Deptt.

(RESPONDENT)  
(DEFENDANT)

I/We Samina Ameer

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. \_\_\_\_/\_\_\_\_/2016

See  
CLIENT

ACCEPTED

**NOOR MOHAMMAD KHATTAK**  
(ADVOCATE)

OFFICE:

Room No.1, Upper Floor,  
Islamia Club Building, Khyber Bazar,  
Peshawar City.

Phone: 091-2211391

Mobile No.0345-9383141

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

Appeal No. 731/2016

Mst Samina Ameer------(Appellant )

**VERSUS**

The Govt of KP Through Secretary Education -----  
(Respondents)

**Parawise Comments on Behalf of Respondents**

Respectfully Sheweth,

Preliminary Objections:-

1. That the appellant has got no cause of action and locus standi to file the instant appeal.
2. That the instant appeal is bad in its present form, hence incompetent and liable to be dismissed.
3. That the instant appellant is not maintainable in the eye of law.
4. That the instant appellant is badly time barred.
5. That the appeal is estopped by her own conduct to file the instant appeal.
6. That the appellant has not come to this Honourable Tribunal with clean hands.
7. That the appellant concealed the material facts and kept this Honourable Tribunal in dark.
8. That the instant appeal is liable to be dismissed on account of non-joinder and mis-joinder of unnecessary parties.
9. That according to section 10 of the civil servant Act 1973, every civil servant shall be liable to serve anywhere within or outside the province.
10. That the answering respondent transferred the appellant in good faith and in public interest and in exigency of service.

**ON FACTS**

1. Para 1 pertains to record, hence no comments.



2. Para 2 is incorrect and being an ancient story, has of no value and badly time barred, hence denied.
3. Reply of para 3 is that all transfers in the department are made on need basis, public interest and due to lack of vacant post nearby, grievances, regarding any transfer should be made to the competent authority, with in time, hence denied.
4. Para 4 is correct to the extent of frequent transfers on need basis and for purpose of pay and due to urge of other candidates being most deserving to be adjusted at the impugned station, hence denied.
5. Para 5 is incorrect and due to landowner issue, many transfers were made, hence denied.
6. Para 6 is correct and after removal of nuisance in the impugned station, the transfers was made, hence denied.
7. Para 7 in incorrect, baseless and according to section 10, civil servant Act 1973, every civil servant will serve everywhere and no post is original or personal property of any employee and any step initiated in this regard by the competent authority will be on need basis, public interest and to avoid complications for the smooth running of the concerned school administration, hence denied.
8. Para 8 is incorrect, baseless against law and facts and the instant appeal is derived of merit, hence denied.

## GROUNDS

- A. Para A is incorrect, baseless, against law and facts and thoroughly explained supra in preliminary objections, hence denied.
- B. Para B is incorrect, baseless and to avoid complication and smooth running for any concerned school administration, the competent authority did the needful, hence denied.
- C. Para C is incorrect and against the section 10 of civil servant Act 1973, hence denied.
- D. Para D is incorrect, baseless, against law and facts, hence denied.
- E. Para E is incorrect, baseless, against law and facts, hence denied.
- F. Para F is incorrect, baseless, against law and facts, hence denied.
- G. Para G is incorrect, baseless and detail of which is given in facts, hence denied.

H. Para H is incorrect and the respondents may also be allowed to raise additional grounds and proof at the time of arguments.

Therefore it is humbly prayed that keeping in view the above mentioned facts, the instant appeal may kindly be dismissed with cost.

Respondents

Through

  
District Education Officer (F)  
Mardan



Office of the  
**DISTRICT COMPTROLLER OF ACCOUNTS**  
MARDAN

Ph/Fax # 0937-9230066..

Before the Khyber Pakhtunkhwa Service Tribunal Peshawar

Reply on behalf of respondent No.4 in appeal No.731/2016 lodged by Samina Amir against Education department & others.

In this respect it is submitted that posting/transfer of an employee is the jurisdiction of the department concerned on whom payroll the individual born.

Audit functions starts when claim for pay or travelling charges bill of a transferred officer/official is received in the audit office.

In that case audit had to see that:-

1. Transfer order has been issued by competent authority.
2. Vacant post of the Grade is available at new station of duty.

It is however pertinent to point out that in the present appeal the plaintiff has repeatedly use the word "detailed or detainment" therefore it is clarified that in case of "detail" only the station of duty is changed actual transfer or change of DDO is not involved.

Keeping in view the above it is prayed that audit office may be exempted from attendance in this case.

Submitted please.

  
**District Comptroller of Accounts**  
Mardan  
**District Accounts Officer**  
Mardan

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

**APPEAL NO. 731/2016**

**SAMINA AMEER**

**VS**

**EDUCATION DEPTT:**

**REJOINDER ON BEHALF OF THE APPELLANT IN**  
**RESPONSE TO REPLY SUBMITTED BY THE**  
**RESPONDENTS**

**PRELIMINARY OBJECTIONS:**

**1 TO 10:**

All the preliminary objections raised by the respondents are incorrect, baseless and not in accordance with law and rules rather the respondents are estopped due to their own conduct to raise any objection at this stage of the appeal.

**ON FACTS:**

- 1- Admitted correct hence need no comments.
- 2- Incorrect and not replied accordingly. That during service the appellant was transferred to GGHS Gujar Ghari against the post of Lab Attendant vide order dated 08.09.2004, wherein just after the lapse of five minths the appellant was transferred to the office of EDO Mardan agisnt the wrong post of Sweeper (BPS-1) vide order dated 22.2.2005.
- 3- Incorrect and not replied accordingly. That such transfer of the appellant was pre-mature and also against the public interest.
- 4- Admitted correct to the extent of transfers but the appellant was transferred/adjusted on a wrong post while the remaining para is incorrect. That appellant was served for more than nine years on the wrong post of sweeper (BPS-1) the appellant was adjusted on her original post of Lab Attendant at GGHS Sanga Ahmad Gul Kalay vide order dated 26.2.2013. That appellant time and again requested the concerned authoritites for her transfer to her original place of posting i.e. GGHSS Shah Dhand Baba Mardan and lastly her request was exceeded vide order dated 7.8.2014 whereby the appellant was deputed to work as Lab Attendant at GGHSS Shah Dhand Baba Mardan. That wherein the appellant was again disturbed from her original place of posting to that of GGHS Shekhano Banda Lund Khwar but again she was adjusted at her original place of posting vide order dated 1.11.2014.

- 5- Incorrect and not replied accordingly hence denied.
- 6- Admitted correct hence need no comments.
- 7- Incorrect and replied accordingly. That vide order dated 6.7.2015 the respondent No.3 malafidely concerted the transfer/adjustment order of the appellant as on detailment basis just for the reason to accommodate her blue eyed person through initial recruitment.
- 8- Incorrect and replied accordingly.

**GROUNDS:  
(A TO H):**

All the grounds of main appeal are correct and in accordance with law and prevailing rules and that of the respondents are incorrect and baseless. That the impugned order dated 6.7.2015 is violative of clause I, VIII of the transfer/posting Policy of Provincial Government. That the impugned order dated 6.7.2017 has been issued just to accommodate her blue eyed person through initial recruitment on the said post.

It is therefore, most humbly prayed that on acceptance of this rejoinder the appeal of the appellant may be accepted in favor of the appellant.

**APPELLANT**

  
**SAMINA AMEER**

**THROUGH:**

  
**NOOR MOHAMMAD KHATTAK  
ADVOCATE**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

No 2663 /ST

Dated 13 /12/2017

To

The District Education Officer (F),  
Government of Khyber Pakhtunkhwa,  
Mardan.

Subject: **JUDGEMENT/ORDER IN APPEAL NO. 731/16, Mst: SAMINA AMEER.**

I am directed to forward herewith a certified copy of Judgment/order dated 23/11/2017 passed by this Tribunal on the above subject for strict compliance.

**Encl: As above**

*etc*  
REGISTRAR  
KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL  
PESHAWAR.