

10.11.2016

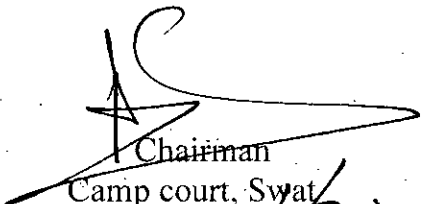
Agent of counsel for the appellant and Mian Amir Qadar, GP for the respondents present. Learned counsel for the appellant is stated busy before the Hon'ble Peshawar High Court, Mingora Bench (Darul Qaza) Swat. Seeks adjournment. Adjourned for preliminary hearing to 08.12.2016 before S.B at camp court, Swat..

  
Chairman  
Camp court, Swat

08.12.2016

None present for the appellant despite repeated calls. The court time is about to over. Mr. Muhammad Zubair, Sr.GP for the respondents present.

Dismissed for want of prosecution. File be consigned to the record room.

  
Chairman  
Camp court, Swat

ANNOUNCED  
08.12.2016

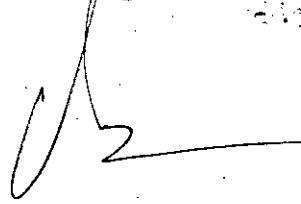
08-12-16

Appeal No. 809/2016  
Bibi Saeeda Naz vs Govt

18.08.2016

Counsel for the appellant present. Preliminary arguments heard and case filed perused. Through the instant appeal, the appellant has impugned Adjusted Order dated 22.11.2014 and alongwith appeal appellant was filed an application for condonation of delay. Learned counsel for the appellant submitted before the court that being continues wrong the delay may be condoned. However, an order to clarify the contention of learned counsel for the appellant, further pre-admission notice be issued to the Government Pleader. The case pertains to the territorial limits of Malakand Division as such the same is posted to Swat. To come up for further proceedings on 8.9.2016 at Camp Court Swat.

Swat.



Member

08.09.2016

Counsel for the appellant and Mr. Anwarul Haq, GP for the respondents present. Counsel for the appellant submitted application for keeping the appeal sine-die. Notice of application be given to the learned GP. To come up for further proceedings on 10.11.2016 at camp court, Swat.



Chairman



Camp Court, Swat.

## FORM OF ORDER SHEET

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

Case No. \_\_\_\_\_

809/2016

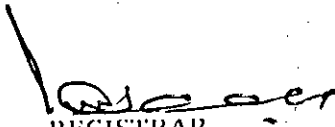
S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	10/08/2016	<p>The appeal of Mst. Bibi Saeeda Naz resubmitted today by Mr. Hamza Amir Gulab Advocate may be entered in the Institution Register and put up to Learned Member for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2	11/8/2016	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on. <u>18-08-2016</u></p> <p style="text-align: right;"> MEMBER</p>

The joint appeal of Mst. Shahida Akhtar, Naseem Akhtar, Bibi Saeeda Naz, Baitul Jamal and Farhad Irshad received to-day i.e. on 27.07.2016 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Appeal may be got signed by the appellants & counsel.
- 2- Addresses of appellant are incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 3- Copy of enquiry report is incomplete which may be completed.
- 4- Sub-rule-2 of rule-3 of appeal rules 1986 requires that every affected civil servant shall prefer the appeal separately; therefore the appeal of the above named appellants may be filed separately/individually.
- 5- Departmental appeal having no date be dated.
- 6- Three copies/sets of the appeal along with annexures i.e. complete in all respect for Tribunal and one for each respondent in each appeal may also be submitted.

No. 1200 /S.T.


Dt. 27/7/2016

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Amir Gulab Khan Adv. Pesh.

Note: All the objections are removed  
file be placed before court.

10/08/16.

  
Hamza Amir Gulab  
Adv

Khyber Pakhtunkhwa  
Service Tribunal

Dir. No. 836

Dated 10-8-2016

(1)

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

Service Appeal No 809 of 2016

Bibi Saeeda Naz .... Versus .....Government of KPK through Sec: Elementary  
and Secondary Education at Peshawar & Others

**INDEX OF DOCUMENTS**

S No	Description of Documents	Annexure	Pages
1.	Appeal with certificate		1-5
2.	Suspension application with affidavit		6-7
3.	Application for condonation of delay with affidavit		7-9
4.	Addresses of parties		10
5.	Copy of Notification dated 26.12.2012	A	11-15
6.	Copy of Regulatory Act 2011	B	16-23
7.	Copy of Policy dated 18.01.2013	C	24-25
8.	Copy of Order dated 26.07.2014	C-1	26-30
9.	Copy of Order dated 21.08.2014	C-2	31-45
10.	Copy of Enquiry Report	D	46-49
11.	Copy of Order dated 10.09.2014	E	50
12.	Copy of Show Cause notice dated 27.07.2015	E-1	51
13.	Copy of Appeal	F	52
14.	Copy of Writ Petition	G	53-55
15.	Copy of Order of High Court dated 16.05.2016	H	56-62
16.	Wakalat Nama		

  
Appellant

Through

  
Amir Gulab Khan

&

  
Hamza Amir Gulab  
Advocates

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

Service Appeal No 809 of 2016

Bibi Saeeda Naz Primary School Head Teacher Government Girls Primary  
School Kari Tehsil and District Chitral

..... Appellant

**VERSUS**

1. Government of KPK through Sec: Elementary and Secondary Education at Peshawar
2. Director Elementary and Secondary Education at Peshawar
3. District Education Officer (female) District Chitral.

..... Respondents

**APPEAL U/S 4 OF THE SERVICE TRIBUNAL ACT  
1974 AGAINST THE POSTING/TRANSFER ORDER  
NO 4640 PRIMARY REGULARIZATION 20145  
DATED 21.08.2014 ENDORSED VIDE NO 8308-88  
DATED 22.11.2014.**

Re-submitted to -day  
and filed.

PRAYER: 10/8/16

On acceptance of this Appeal the impugned Transfer and adjustment order dated 21.08.2014 and 22.11.2014 may graciously be ordered to be cancelled and strict compliance of rationalization formula be directed to be followed and thereafter adjustment should be made in accordance with the seniority existing on the date of promotion/upgradation i.e. 26.12.2012

## FACTS

**Respectfully Sheweth,**

1. That the Appellant was serving as Primary School Teacher in the School situated in her respective Union Council.
2. That through notification endorsed vide No 21023-27 dated 26.12.2012, the posts of the Appellant was upgraded and She was promoted as Primary School Head Teacher in BPS 15  
**(Copy of Notification is Annexure A)**
3. That the terms and conditions for the posting/transfer of the Primary School Teachers are regulated vide Khyber Pakhtunkhwa (Appointment, Deputation, Posting and Transfer of Teachers, Lecturers, Instructors and Doctors) Regulatory Act 2011.  
***Copy of Regulatory Act 2011 is annexed as Annexure B)***
4. That the posts of Primary School Teachers were directed to upgraded and rationalized after such upgradation and promotion in accordance with the formula and guidelines laid down in the policy bearing No 2412-254-A/Promotion/Estab dated Peshawar the 18.01.2013 issued and endorsed by Deputy Director (Estab) Elementary and Secondary School Education Khyber Pakhtunkhwa vide Endorsement No 1/A-88/KC/S.List dated Peshawar the 18.1.2013  
***Copy of Policy bearing No dated 18.01.2013 is annexed as Annexure C***
5. That Respondent No 3 DEO Female Chitral was required to adopt and follow the rationalization Policy before making any transfer or adjustment order immediately after the promotion and before the transfer/adjustment but the matter was willfully delayed with ulterior motive and ultimately the impugned transfer and adjustment orders dated 26.07.2014 and 21.08.2014 endorsed on 22.11.2014 was issued after the delay of almost two years  
**(Copy of orders dated 26.07.2014 and 21.08.2014 are annexed as Annexure C-1 and C-2)**
6. That since delay in the Transfer and adjustment was unrational, based on malafide and ulterior motive, therefore the impugned order give rise to multiple difficulties and confusions, therefore the matter was taken up with the High ups by some of the affectees which led to the intervention and enquiry and in the light of enquiry report Respondent No 1 issued the direction to stop further transfer orders vide his order dated 10.09.2014.  
***Copy of the enquiry report and order dated 10.09.2014 is annexed as Annexure D and E)***

7. That Respondent No 3 still issued show cause notice dated 27.07.2015 .  
**Copy of show cause notice dated 27.07.2015 is annexed as Annexure E-1**
  
8. That the Appellant filed Appeal before the Higher Forum and also filed a Writ Petition before the Peshawar High Court Mingora Bench.  
*(Copy of Appeal and Writ Petition is annexed as Annexure F and G)*
  
9. That prior to Writ Petition the matter was agitated before the Civil Court.
  
10. That the Honourable High Court vide order dated 16.05.2016 dismissed the Writ Petition on point of jurisdiction.  
**(Copy of Order of High Court dated 16.05.2016 is annexed as Annexure G-1)**
  
11. That having no other alternate remedy the Appellant is constrained to approach this Honourable Tribunal on the following grounds inter alia :

**GROUNDS**

- A. That the impugned Order is illegal, against the Government Policy, Rules and Regulation.
  
- B. That the Respondent No 3 has willfully delayed the rationalization formula/policy which led to deprivation of legal right of Appellant to forego the promotion in case if they could not find suitable and workable and possible place of posting.
  
- C. That if the rationalization police has been completed in time the Appellants would have a better opportunity of adjustment and posting in their respective Union Council.
  
- D. That as it has been held by the Honourable High Court in its judgment passed in the Writ Petition of Appellant they were entitled to be adjusted in the adjacent or nearer Union Council in case of their posting out of present School of Service
  
- E. That it will be in the ends of natural justice, and government policy to adjust the Appellant and others next and adjacent Union Council instead of being posted in remote areas.



F. That the remote area to which the Appellant has been posted do not permit agreeable law and order situation for the female teachers, besides lacking boarding and lodging facilities.

G. That the interest of public is the prime priority in case of transfer posting which the Respondents have lost sight of while passing the impugned order.

H. That it is more reasonable, just and proper and natural to adjust/transfer the teachers nearer to their Union Council specially in case of female teacher who besides the job also took after their minor and baby children with in the limited and low salary.


I. That further grounds, with leave of this Honorable Court, would be raised at the time of arguments before this Honorable Court.

On acceptance of the legal factual and legal grounds It is therefore prayed that:

- i. impugned Transfer and adjustment order dated 21.08.2014 and 22.11.2014 may graciously be ordered to be cancelled and strict compliance of rationalization formula be directed to be followed and thereafter adjustment should be made in accordance with the seniority existing on the date of promotion/upgradation i.e. 26.12.2012
- ii. In case of after rationalization the Appellant cannot be adjusted in her present Union Council, she may be adjusted in the next nearer Union Council.
- iii. Any other relief which this Honorable Tribunal deems fit and proper in the circumstances may graciously be granted to the Appellant.


  
Appellant

Through   
Amir Gulab Khan

&   
Hamza Amir Gulab  
Advocates,

**CERTIFICATE**

Certified that no such like appeal earlier has been filed by the Appellant on the subject matter before this Honorable Court.

  
Advocate

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

C. M No...../2016

**In**

**Service Appeal No \_\_\_\_\_ of 2016**

**Bibi Saeeda Naz .... Versus .....Government of KPK through Sec: Elementary  
and Secondary Education at Peshawar & Others**

**APPLICATION FOR SUSPENSION OF OPERATION OF  
IMPUGNED TRANSFER/ADJUSTMENT ORDERS DATED  
26.07.2014 AND 22.11.2014 AND NOTICE DATED  
27.07.2015**

**Respectfully Sheweth,**

- 1) That the captioned Service Appeal along with instant application is being filed before this Hon'ble Court, wherein no date of hearing has yet been fixed.
- 2) That the Appellant prays for the suspension of operation of impugned Transfer and adjustment order dated 21.08.2014 and 22.11.2014.

**GROUND**

- A) That due to the grounds set out in the accompanied Service Appeal, Appellant is having a good prima facie case in his favour and is sanguine of its success.
- B) That Appellant is serving in her respective present place of posting/ Schools.
- C) That it is impossible to female teachers to serve in remote areas far away from their respective Union Council.
- D) That Appellant cannot find any accommodation and even ensure their security in remote areas, especially where the area is under threat because of prevailing terrorism in PATA.

E) That if the operation of orders is not suspended, Applicant/Appellant may be exposed to great hard ship and would suffer irreparable loss.

F) That grounds of appeal may graciously be considered as part of this Application.

It is, therefore, most humbly prayed that on acceptance this application, interim relief as prayed for in the heading of application may be granted in favour of Appellant against the Respondents.

  
Appellant

Through

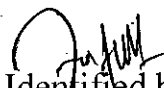
  
Amir Gulab Khan

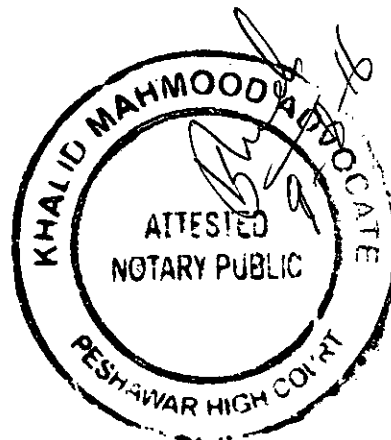
&

Hamza Amir Gulab  
Advocates,

**AFFIDAVIT**

I Israr -ud-Din S/O Meraj-ud-Din R/O Kujju Tehsil and District Chitral as special attorney do hereby solemnly declared and affirm on oath that the contents of the instant Application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court

  
Identified by  
Hamza Amir Gulab  
Advocate



  
DEPONENT  
15201-3563033-5

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

C. M No...../2016

**In**

**Service Appeal No \_\_\_\_\_ of 2016**

**Bibi Saeeda Naz .... Versus .....Government of KPK through Sec: Elementary  
and Secondary Education at Peshawar & Others**

**APPLICATION FOR CONDONATION OF DELAY**

**Respectfully Submitted,**

- 1) That the captioned Service Appeal along with instant application is being filed before this Hon'ble Court, wherein no date of hearing has yet been fixed.
- 2) That the Appellant prays for the condonation of delay in the instant Appeal on the following grounds:

**GROUNDS**

- A. That the matter remained under adjudication before Civil Court and High Court.
- B. That under the law, the time consumed in wrong forums is amenable to condonation of delay if any.
- C. That the Respondents have failed to consider and pass any order on the Departmental Appeal of Appellant.

D. That the Appellant is a female School Teacher serving in remote area of Chitral District and do not have the convenient and easy access to legal consultation and assistance to file Appeal.

E. That the delay if any was beyond the control of Appellant.


It is therefore prayed that on acceptance of this application the delay if any may graciously be condoned.

  
Appellant/Applicant

Through


  
Amir Gulab Khan

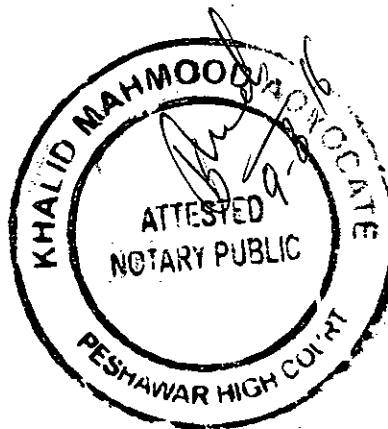
&

  
Hamza Amir Gulab  
Advocates,

**AFFIDAVIT**

I Israr -ud-Din S/O Meraj-ud-Din R/O Kujju Tehsil and District Chitral as special attorney do hereby solemnly declared and affirm on oath that the contents of the instant Application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court

  
Identified by  
Hamza Amir Gulab  
Advocate



  
DEPONENT

15201-3563033-5

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

Service Appeal No \_\_\_\_\_ of 2016

Bibi Saeeda Naz .... **Versus** .....Government of KPK through Sec: Elementary  
and Secondary Education at Peshawar & Others

**ADDRESSES OF PARTIES**

**Appellant:**

Bibi Saeeda Naz Primary School Head Teacher Government Girls Primary  
School Kari Tehsil and District Chitral

**Respondents:**

1. Government of KPK through Sec: Elementary and Secondary Education at Peshawar
2. Director Elementary and Secondary Education at Peshawar
3. District Education Officer (female) District Chitral.



Appellant

Through



**Amir Gulab Khan**

&



**Hamza Amir Gulab  
Advocates,**

Annex 'A'

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E&S) EDUCATION CHITRAL

OFFICE ORDER

In pursuance of Elementary & Secondary Education Department Government of Khyber Pakhtunkhwa Peshawar vide No. SO (B&A)1-18/E&SE/2012 dated 11.07.2012 and approval of the Departmental Selection/Promotion Committee vide No. 27714-20 dated 24.12.2012. Sanction is hereby accorded to the up gradation/promotion of Primary School Head Teacher (Female) BPS-14 to BPS-15 with effect from 01.07.2012.

S.No	Seniority No	Name of Teacher	Place of duty	Designation
1	1	Rahana Shafqat, PST	GGPS: Lawi.	PSHT
2	3	Samina Bibi, PST	GGPS Khorkashandeh	PSHT
3	5	Bibi Benazir, PST	GGPS: Kore Broze.	PSHT
4	6	Pali Naz, PST	GGPS: Singoor Lot Deh.	PSHT
5	7	Nasim Akhtar, PST	GGPS: Bakamak.	PSHT
6	8	Farida Bibi, PST	GGPS: Ragh.	PSHT
7	9	Bibi Taj, PST	GGPS: Bakamak.	PSHT
8	10	Bibi Jamila	GGPS Washich	PSHT
9	11	Tila Bibi, PST	GGPS: Throiandeh	PSHT
10	12	Khurshid Jahan, PST	GGCMS: Ayun	PSHT
11	14	Sultan Banu, PST	GGPS: Shoghore.	PSHT
12	15	Rahima Begum	GGPS Chuinj	PSHT
13	16	Bibi Sadia	GGPS Z/Gram.	PSHT
14	17	Bibi Rahman Jamal	GGPS Reshun	PSHT
15	18	Sifat Bibi	GGPS: Zayet	PSHT
16	20	Noor Jehan	GGPS Drungagh	PSHT
17	21	Nasim Akhtar, PST	GGCMS: Jinjirate.	PSHT
18	22	Farzana Yasmeen, PST	GGPS: What.	PSHT
19	23	Hasina Bibi, PST	GGPS Ayun Muldeh.	PSHT
20	24	Razia Khatoon, PST	GGPS: Drosh	PSHT
21	25	Haji Bibi, PST	GGPS: Beori Bala.	PSHT
22	27	Yasmeen Bibi, PST	GGPS: Chumurkone Kuh	PSHT
23	29	Sharafatun Nisa PST	GGCMS: Mori Bala.	PSHT
24	30	Shahnaz Begum, PST	GGPS: Seen Lashc.	PSHT
25	33	Razia Sultana	GGPS	PSHT
26	35	Jahan Khurshid	GGCMS: Mori Bala.	PSHT
27	36	Bibi Shahnaz	GGPS Khot Bala	PSHT

P.No 7/6

ATTESTED

*[Handwritten Signature]*

28	38	Tahira Jabeen, PST	GGPS:Pattai Nagar.	PSHT
29	39	Shamim Ijaz, PST	GGPS:Kari.	PSHT
30	40	Shahzadi Nargis, PST	GGPS:Chumurkone	PSHT
31	41	Meher Zareef	Kuh	PSHT
32	42	Bibi Zainab	GGPS Reshun Gole	PSHT
33	43	Zufaikha Bibi	GGPS Shagram	PSHT
34	45	Meraj Gul, PST	GGPS Chuinj	PSHT
35	46	Amina Bibi	GGPS:Singoor	PSHT
36	48	Shamim Akhtar	GGPS Madak	PSHT
37	49	Taqdir Jamal, PST	GGPS:Mori Payeen.	PSHT
38	50	Gul Sana	GGPS:Dair Ayun	PSHT
39	51	Bibi Hasina, PST	GGPS Reshun	PSHT
40	52	Najma Sultana, PST	GGCMS:Ayun	PSHT
41	53	Farhat, PST	GGPS:Beori Bala.	PSHT
42	54	Zainab, PST	GGPS:Broze Domun.	PSHT
43	55	Bibi Hawala	GGPS:Shishi Drosh.	PSHT
44	56	Bibi Khadija	GGPS Brep	PSHT
45	57	Haleema Parveen	GGPS Sarghuz	PSHT
46	59	Bibi Salima, PST	GGPS Kosht	PSHT
47	60	Karima	GGPS:What.	PSHT
48	61	Pari Zartaj, PST	GGPS Lone Bala	PSHT
49	62	Shams Bibi	GGPS:Danin tasht.	PSHT
50	63	Bibi Sabira	GGPS Terich Payeen	PSHT
51	64	Nasim Akhtar, PST	GGPS Parplsh	PSHT
52	65	Abida Bibi, PST	GGPS Hone Dahar.	PSHT
53	66	Bibi Shakira	GGPS:Shoghore.	PSHT
54	67	Bibi Shahida	GGPS Parkusap	PSHT
55	68	Khalida, PST	GGPS Lone Kuh	PSHT
56	69	Saeeda Bibi	Terich	PSHT
57	70	Jamila Parveen	GGPS:Tak Kaldam.	PSHT
58	71	Muslima Qayum, PST	GGPS Jughoor	PSHT
59	72	Baitul Jamal, PST	GGPS Jughoor	PSHT
60	74	Issa Jamal, PST	GGCMS:Jinjirate.	PSHT
61	75	Bibi Mushrafa, PST	GGPS:Goldur.	PSHT
62	76	Sultana Bibi, PST	GGPS:Dair Ayun	PSHT
63	77	Shahnaz Bibi, PST	GGPS:Bakar Abad.	PSHT
64	78	Malika Bibi, PST	GGPS:Muldeh	PSHT
			Chitral.	PSHT
			GGPS Hone Dahar.	PSHT
			GGPS:Chumurkone	PSHT

**ATTESTED**  
*[Signature]*



138	123	Kawar Parveen	GGPS:Khandor	PSHT
137	122	Zahida Bibi	GGPS:Moroi Parveen	PSHT
136	121	Murtaz Bibi	GGPS:Parwak	PSHT
135	120	Hazara Bibi	GGPS:Baizem	PSHT
134	119	Hazira Bibi	GGPS:Shokhar	PSHT
133	118	Hazuk Bibi	GGPS:Khor Parveen	PSHT
132	117	Zubaida Jahan	GGPS:Kakarok	PSHT
131	116	Bibi Aisha	GGPS:Reshun	PSHT
130	115	Zahira Bibi	GGPS:Booni	PSHT
129	114	Nahed Kishwar	GGPS:Moghalandor	PSHT
128	113	Mertab Jabeen	GGPS:Dakshinandor	PSHT
127	112	Nasem-Banu	GGCMS:Jilrata	PSHT
126	111	Fatman Bibi	GGPS:Shokhar	PSHT
125	110	Nahed Ata Begum	GGPS:Polanandor	PSHT
124	109	Qemat Bibi	GGCMS:Warjun	PSHT
123	108	Shahnaz Bibi	GGPS:Kore Broze	PSHT
122	107	Zaira Bibi	GGPS:Seem Lash	PSHT
121	106	Mehnaz Jabeen	GGPS:Shigoor	PSHT
120	105	Albina Taj	GGPS:Tak Kaldam	PSHT
119	104	Nasreen Parveen	GGPS:Dosh	PSHT
118	103	Iqbal Nisa	GGPS:Lawl	PSHT
117	102	Rukhsana Parveen	GGPS:Shidokak	PSHT
116	101	Zobun Nisa	GGPS:Loze	PSHT
115	100	Tahira Bibi	GGPS:Prayer Parveen	PSHT
114	99	Asmar Bibi	GGPS:Bohdutara	PSHT
113	98	Zahida Bibi	GGCMS:Dargerdini	PSHT
112	97	Sajida Bibi	GGPS:Shish Nisar	PSHT
111	96	Sajida Bibi	GGPS:Kosh Bala	PSHT
110	95	Badiul Jamal	GGPS:Kesh	PSHT
109	94	Zahia Usman	GGCMS:Dargerdini	PSHT
108	93	Zahida Akhtar	GGPS:Whar	PSHT
107	92	Bachcha	GGPS:Balsch	PSHT
106	91	Shahi Khuban	GGPS:Utral	PSHT
105	90	Miri Jamal	GGPS:Kulu Bala	PSHT
104	89	Razia Sultana	GGPS:Dar Ayun	PSHT
103	88	Fatima Parveen	GGCMS:Moroi Bala	PSHT
102	87	Bibi Amina	GGPS:Tar Shishi	PSHT
101	86	Bibi Zahida	GGPS:Muldeb	PSHT
100	85	Bibi Shamsia		

ATTACHED  
 1/1/19

14

3

65	79	Shahnaz Gul, PST	GGPS:Muldeh Chitral.	PSHT
66	80	Gul Dana	GGPS Shagram	PSHT
67	81	Bibi Rabia	GGPS Madak	PSHT
68	82	Ajab Nighar	GGPS Lone	PSHT
69	83	Mehar Nigar, PST	GGPS:Ashirate.	PSHT
70	84	Shamim Ara, PST	GGPS:Parabeg.	PSHT
71	85	Bibi Hamida, PST	GGCMS:Darger dini.	PSHT
72	86	Nasreen Bibi	GGPS Herchin	PSHT
73	87	Shahnaz Bibi	GGPS Reshun	PSHT
74	88	Farman Nisa	GGPS Sonoghor	PSHT
75	89	Nusrat Bibi, PST	GGPS:Kuju Bala.	PSHT
76	90	Jamshida Bibi, PST	GGCMS:Chumurkone	PSHT
77	91	Sirajul Hassana, PST	Deputation to Islamabad	PSHT
78	92	Khadija Mastoor, PST	GGPS:Muldeh Chitral.	PSHT
79	93	Farhat Irshad, PST	GGPS:Izghore Golain	PSHT
80	94	Suraya Begum	GGPS Kuragh	PSHT
81	95	Zaiba Pari, PST	GGPS:Goldeh Broze.	PSHT
82	96	Khonza Pari, PST	GGPS:Badugal.	PSHT
83	97	Nargis Banu, PST	GGPS:Usiak.	PSHT
84	98	Bibi Zahida	GGPS Kuragh	PSHT
85	99	Bibi Sharifa, PST	GGPS:Sheli Lasht.	PSHT
86	100	Sharifun Nisa	GGPS Kosht Bala	PSHT
87	101	Bibi Zahiran	GGPS Kosht Payeen	PSHT
88	102	Nargis Bibi, PST	GGPS:Moghulandh.	PSHT
89	103	Bibi Nasreen	GGPS Lone Kuh Terich	PSHT
90	104	Nasreen Jamal	GGPS Kosht Payeen	PSHT
91	106	Shahina Bibi	GGPS Booni Gole	PSHT
92	107	Qamar Bibi	GGPS Booni Gole	PSHT
93	108	Zeenat Begum	GGPS:Goldur.	PSHT
94	109	Bibi Suriya	GGPS Jughoor.	PSHT
95	110	Bibi Hayat	GGPS Shagram	PSHT
96	111	Mubarak Bibi	GGPS Mustajapandeh.	PSHT
97	112	Shamshad Begum	GGPS:Domun Broze.	PSHT
98	113	Nowshad Begum	GGPS:Moroi Bala.	PSHT

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*[Handwritten Signature]*

99	115	Bibi Shamsia	GGPS:Muldeh Chitral.	PSHT
100	116	Bibi Shahida	GGPS:Tar Shishi	PSHT
101	117	Bibi Amina	GGCMS:Mori Bala.	PSHT
102	118	Fahmina Parveen	GGPS:Dair Ayun	PSHT
103	120	Razia Sultana	GGPS:Kuju Bala.	PSHT
104	121	Misri Jamal	GGPS:Utrai.	PSHT
105	122	Shahi Khuban	GGPS:Balach.	PSHT
106	123	Baghicha	GGPS:What.	PSHT
107	124	Shahida Akhtar	GGCMS:Dargerдини.	PSHT
108	125	Sadia Usman	GGPS:Kesu.	PSHT
109	126	Badiul Jamal	GGPS Kosht Bala	PSHT
110	127	Sajida Bibi	GGPS:Shah Nigar.	PSHT
111	128	Sajida Bibi	GGCMS:Dargerдини.	PSHT
112	129	Asmar Bibi	GGPS:Bomburate Pay:	PSHT
113	130	Tahira Bibi	GGPS:Prayet Payeen.	PSHT
114	131	Zaibun Nisa	GGPS Lone	PSHT
115	132	Rukhasana Parveen	GGPS:Shiaqotak.	PSHT
116	133	Iqbal Nisa	GGPS:Lawi.	PSHT
117	134	Nasreen Parveen	GGPS:Drosh	PSHT
118	135	Albina Taj	GGPS:Tak Kaldam.	PSHT
119	136	Mehnaz Jabeen	GGPS:Singoor	PSHT
120	137	Saira Bibi	GGPS:Seen Lasht.	PSHT
121	138	Shahnaz Bibi	GGPS:Kore Broze.	PSHT
122	139	Qeemat Bibi	GGCMS Warijun	PSHT
123	140	Naheed Ara Begum	GGPS:PotanaIndeh	PSHT
124	141	Farman Bibi	GGPS Shotkhar	PSHT
125	142	Naseem Banu	GGCMS:Jinjirate.	PSHT
126	143	Mehtab Jabeen	GGPS:Darkhanandeh	PSHT
127	144	Naheed Kishwar	GGPS:Moghulandh.	PSHT
128	145	Safina Bibi	GGPS Booni	PSHT
129	146	Bibi Aisha	GGPS Reshun	PSHT
130	147	Zybaida Jahan	GGPS:Kalkatak.	PSHT
131	148	Nazuk Bibi	GGPS Khot Payeen	PSHT
132	149	Hasina Bibi	GGPS Shotkhar	PSHT
133	150	Hazara Bibi	GGPS Baleem	PSHT
134	151	Mumtaz Bibi	GGPS Parwak	PSHT
135	152	Zahida Bibi	GGPS:Moroi Payeen	PSHT
136	153	kawsar Parveen	GGPS:Khorandok.	PSHT

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137	154	Nargis Begum	GGPS:Muldeh Chitral.	PSHT
138	155	Zubaida Iqbal	GGPS:Loli Gram.	PSHT
139	156	Sultan Nigar	GGPS Ragh	PSHT
140	157	Riaz Begum	GGPS:Bakamak.	PSHT
141	158	Margast Bibi	GGPS Booni	PSHT
142	160	Badshah Zareen	GGPS Zizdi	PSHT
143	161	Shahina Bibi	GGPS:Drosh.	PSHT
144	162	Saira Narges	GGPS:Sahan Bala.	PSHT
145	163	Bibi Muhima	GGPS Khot Bala	PSHT
146	164	Muzrifa Bibi	GGPS Rech	PSHT
147	165	Mehri Janat	GGCMS G/Chashma.	PSHT
148	166	Shahnaz Bibi	GGPS Zizdi	PSHT
149	167	Bibi Sakina	GGPS Arian Chitral.	PSHT
150	168	Abida Kai	GGPS Denin.	PSHT
151	170	Nasima Bibi,	Deputed to Islamabad.	PSHT
152	171	Zumrat Bibi	GGPS:Kalkatak.	PSHT
153	172	Bibi Farida	GGPS:Moghulandh.	PSHT
154	173	Mehrab Gul	GGPS Nichag Owir	PSHT
155	174	Zahida Begum	GGPS Nishko	PSHT
156	175	Bibi Javaida	GGPS:Lot Deh Singoor	PSHT
157	176	Gulzar Jamal	GGPS Baleem	PSHT


Note:- 1. Necessary entry should be made in their service books.

(Siraj Muhammad)  
Executive District Officer  
Elementary & Secondary Education  
Chitral

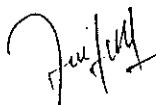
Endst: No. 21023-27 /F.No.dated Chitral the 26/12/2012.

Copy of the above is forwarded to the:-

- 1- Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 2- District Coordination Officer, Chitral.
- 3- District Accounts Officer, Chitral
- 4- EDO (Finance & Planning) Deptt: Chitral.
- 5-6 DDO (Female) Chitral & Mastuj at Booni.
- 7- DEMIS Local Office.

  
Executive District Officer  
Elementary & Secondary Education  
Chitral

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*Handwritten: 31/1/2013*

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

PH No. 091-9201389, 9210938,  
9210437, 9210957, 9210458  
Fax 091-9210935 0800-33857  
No. 2412-2524 / Promotion / Etab  
Dated Peshawar the 24/01/2013.

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Annex C

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

Subject:- Guidelines for Posting of PST B-12 on Promotion to the post of Senior PST B-14 and PSHT B-15, Qari B-12 to B-15, CT B-15 to Senior CT B-16, AT B-15 to Senior AT B-16, TT-15 to Senior TT B-16, DM B-15 to Senior DM B-16 and PET B-15 to Senior PET B-16.

Memo:

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

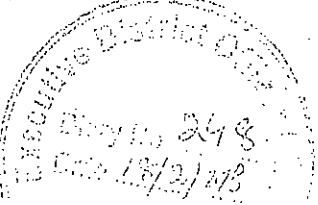
**Up gradation of Posts in Primary Schools (Female) After Rationalization @ 1-40 ratio**

S.No	School Code	Name of Primary School	Total Enrolment	Sanctioned Posts after Rationalization								
				SPST B-16	CT B-15	PSHT B-15	SPST B-14	PST B-12	NQ	Callar	Chow.	
1	25268	GGPMS A (JICA)	208	1	2	0	2	3	1	1	1	
2	25048	GGPMS B (JICA)	206	1	2	0	2	6	1	1	1	
3	25143	GGCMS C	173	1	0	0	2	3	1	1	1	
4	30056	GGPS D	50	0	0	1	0	1	0	0	1	
5	25224	GGPS E	110	0	0	1	1	1	0	0	1	
6	25244	GGPS F	160	0	0	1	1	2	0	0	1	
7	25277	GGPS G	198	0	0	1	1	3	0	0	1	
8	25221	GGPS H	240	0	0	1	2	3	0	0	1	
9	32912	GGPST	285	0	0	1	2	4	0	0	1	
10	25097	GGPS J	320	0	0	1	2	5	0	0	1	
11	25138	GGPS K	360	0	0	1	2	6	0	0	1	
12	32606	GGPS L	400	0	0	1	3	6	0	0	1	
13	25278	GGPS M	440	0	0	1	3	7	0	0	1	
Total			3250	3	4	10	23	50	3	3	13	

**Up gradation of Posts in Primary Schools (Male) After Rationalization @ 1-40 ratio**

S.No	School Code	Name of Primary School	Total Enrolment	Sanctioned Posts after Rationalization			
				PSHT B-15	SPST B-14	PST B-12	Chow
1	30056	GPS A	50	1	0	1	1
2	25224	GPS B	110	1	1	1	1
3	25244	GPS C	160	1	1	2	1
4	25277	GPS D	198	1	1	3	1

*Handwritten:* 9/13  
Issue to all  
schools concerned



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5	25221	GPS E	240	1	2	3	1
6	32912	GPS F	285	1	2	4	1
7	25097	GPS G	320	1	2	5	1
8	25138	GPS H	360	1	2	6	1
9	32606	GPS I	400	1	3	6	1
10	25278	GPS J	440	1	3	7	1
Total			2563	10	17	38	10

Note:-

1. Each Primary School (except JICA & Community Model School where SST post is sanctioned) will have one post of PSHT B-15.
2. There will be no post of PSHT B-15 & SPST B-14 in MPS.
3. No of posts of PSHT B-15, SPST B-14 & PST B-12 will not exceed the already communicated sanctioned posts.

Posting on Promotion

4. On Promotion of PST B-12 to the post of Senior PST B-14 and PSHT B-15, may be posted in the same UCs Subject to the provisions of sanctioned post,
5. Senior most PSHT B-15, SPST B-14 & PST B-12 (According to the Seniority list) may be retained in the school of their present posting and junior most may be transferred to other schools.
6. In their promotion order it should be mentioned that their Inter-se-Seniority on lower post will remain intact.
7. If anyone forego promotion, Entry to this effect may be made if his/her Service book.
8. Minimum qualifications for the above posts have already been prescribed in the Service Rules notified vide Government of Khyber Pakhtunkhwa Elementary and Secondary Education Department Notification No. SO (PE) 4-5/SSRC/Meeting/2012/Teaching Cadre Dated the November 13, 2012.

I am further directed to further clarify that:

1. On promotion Qari B-12 to the post of Senior Qari B-15, CT B-15 to Senior CT B-16, AT B-15 to Senior AT B-16, TT-15 to Senior TT B-16, DM B-15 to Senior DM B-16 and PET B-15 to Senior PET B-16, will be posted in High and Higher Secondary Schools
2. 1/3 Qari B-12 posts will be upgraded to Senior Qari B-15, CT B-15 to Senior CT B-16, AT B-15 to Senior AT B-16, TT-15 to Senior TT B-16, DM B-15 to Senior DM B-16 and PET B-15 to Senior PET B-16 in High and Higher Secondary Schools only in Elementary and Secondary Education Department at District Level.
3. No post of CT B-15, PET B-15, AT B-15, DM B-15, TT-15, will be upgraded to B-16 in Middle Schools.
4. Senior most Senior CT B-16, Senior AT B-16, Senior DM B-16, Senior PET B-16, Senior TT B-16 (According to the Seniority list) may be retained in the schools of their present posting and junior most may be transferred to other schools.

*[Handwritten Signature]*

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

Endst: No. / File No. 1/A-88/KC/S.list : Dated Peshawar the 18/01/2013.

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

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

*[Handwritten notes and signatures on the right margin]*

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OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ELEMENTARY & SECONDARY  
EDUCATION CHITRAL

**ATTACHED**  
J. K. S.

OFFICE ORDER

Transfer of the following PSHT/SPST and PST (female) teachers in the elementary & Secondary Education Department is here by ordered on their own pay and grade in the best interest of Public Service in the school noted against each with immediate effect:-

S.#	Name of The Teacher	Dasg	D/O TOC in Present Station	Transfer		Remarks
				From	To	
1	Saiiha Bibi	PST	24-09-2009	GGPS Chumuruk	GGPS Koghuzi Payeen	VSN.2
2	Naseera Bibi	PST	13-08-2009	GGPS Koghuzi Payeen	GGPS Chumuruk	VSN. 1
3	Razia Sultana	PSHT	10-5-2009	GGPS Kuju	GGPS Mori Payeen	VSN. 4
4	Shamim Akhtar	PSHT	16-08-2010	GGPS Mori Payeen	GGPS Moghlandeh	VSN. 5
5	Zeenat Bibi	PST	2-8-2011	GGPS Moghlandeh	GGPS Mustajapandeh	Against Vacant Post.
6	Khurshid Ara	PST	01-08-2011	GGPS Asperdamal	GGPS Kuju	VSN. 3
7	Bibi Saadia	SPST	29-3-2011	GGPS Mori Payeen	GGPS Denin Gazandeh	VSN. 8
8	Zahanat Jabeen	PST	5-8-2011	GGPS Denin Gazandeh	GGPS Mori Payeen	VSN. 7
9	Jahan Khurshid	PSHT	1-8-2009	GGCMS Mori Bala	GGPS Moldeh Chitral	VSN. 10
10	Shahnaz Gul	PSHT	20-8-2004	GGPS Moldeh Chitral	GGCMS Mori Bala	VSN. 9
11	Shamim Ijaz	PSHT	24-8-2011	GGPS Kari	GGPS Moldeh	VSN. 12
12	Bibi Shamsia	PSHT	20-9-2003	GGPS Moldeh Chitral	GGPS Kari	VSN. 11
13	Jabeen	SPST	24-8-2011	GGPS Kari	GGPS Goldur	VSN. 14
14	Saeda Naz	SPST	26-6-2004	GGPS Goldur 6	GGPS Kari	VSN. 13
15	Bibi Amina	PSHT	1-8-2011	GCMS Mori Bala	GGPS Denin Lasht	VSN.16
16	Safoora Bibi	PST	3-8-2009	GGPS Deninlasht	GGCMS Moroi Bala	VSN. 17
17	Bibi Hoor	SPST	8-8-2011	GGPS Moroi Payeen	GGCMS Mori Bala	VSN.15
18	Sharifa Bibi	PSHT	26-4-2011	GGPS Sheli Lasht	GGPS Moldeh	VSN. 19
19	Sultana Bibi	PSHT	20-8-2004	GGPS Moldeh Chitral	GGPS Sheli lasht	VSN.18
20	Tahira Bibi	PSHT	1-8-2011	GGPS Prayet	GGPS Barenis Payeen	VSN. 21
21	Fatima Jahan	SPST	16-4-2000	GGPS Barenis Payeen	GGPS Prayet	VSN.20

	Shahnaz Begum	PSHT	6-6-2009	GGPS Seenlasht	GGPS Goldur	VSN. 24
23	Bibi Javeeda	PSHT	4-10-2002	GGPS Lotdeh Singoor	GGPS Seen Lasht	VSN.22
24	Zeenat Sarwar	PSHT	9-9-1996	GGPS Goldur	GGPS Denin Lasht	VSN. 25
25	Pari Zartaj	PSHT	3-8-2011	GGPS Denin lasht	GGPS Lotdeh Singoor	VSN. 23
26	Shahnaz Bibi	PST	25-8-2004	GGCMS Mori Bala	GGPS Mustajapandeh	VSN. 27
27	Mubarek Bibi	PSHT	11-6-2009	GGPS Mustajapandeh	GGCM Mori Bala	VSN. 26
28	Asma Ansari	PST	11-9-2010	GGPS Orghoch	GGPS Bakerabad	VSN. 29
29	Mushrifa Bibi	PSHT	21-4-2004	GGPS Bakerabad	GGPS Orghoch	VSN. 28
30	Shamim Ara	PSHT	10-8-1997	GGPS Parabeg	GGPS Moldeh Chitral	VSN. 32
31	Irshad Parvaiz	SPST	1-4-2003	GGCM G. Chashma	GGPS Parabeg	VSN. 30
32	Khadija Mastoor	PSHT	8-1-2007	GGPS Moldeh Chitral	GGPS Shoghor	VSN.33
33	Bibi Abida	PSHT	5-8-2011	GGPS Shoghor	GGPS Murdan	VSN. 34
34	Nasreen Bibi	SPST	27-8-2004	GGPS Murdan	GGPS Utrai	VSN. 35
35	Misri Jamal	PSHT	6-5-2010	GGPS Utrai	GGCMS G Chashma	VSN. 31
36	Bibi Salima	PSHT	15-8-2011	GGPS Waht	GGPS Bashqar Bala	VSN.37
37	Sadia Bano	SPST	27-8-2004	GGPS Bashqar Bala	GGPS Wahat	VSN. 36
38	Jahan Parvaiz	SPST	31-5-2010	GGPS Waht	GGPS Bashqar Bala	VSN.39
39	Sardar Bibi	SPST	20-10-2009	GGPS Bashqar Bala	GGPS Wahat	VSN. 38
40	Farhat Jabeen	PST	25-11-2010	GGPS Parabeg	GGCMS G. Chashma	VSN. 41
41	Noor Jahan	PST	2-5-2009	GGCMS G. Chashma	GGPS Parabeg	VSN. 40
42	Habiba	PST	24-11-2010	GGPS Pitragram	GGPS Hinjil	VSN. 43
43	Rashida Bibi	PST	26-08-2009	GGPS Hinjil	GGPS Pitragram	VSN.42
44	Sajida Parveen	PST	14/6/2006	GGPS Arandu lasht	GGPS Drosh	VSN. 45
45	Zareen Bibi	PST	1-09-2010	GGPS Drosh	GGPS Arandu Lasht	VSN. 44
46	Minhas jabeen	PST	24-11-2010	GGPS Arandu	GGPS Drosh	VSN.47
47	Insia Bibi	PST	12-8-2010	GGPS Drosh	GGPS Dargirdini	VSN.93



	Kunza Pari	PSHT	01-08-2010	GGPS Badugal	GGPS Drosh	VSN.49
49	Nasreen Parveen	PSHT	17-05-2009	GGPS Drosh	GGPS Badugal	VSN. 48
50	Naseem Banu	PSHT	23-11-2007	GGCMS Jinjirit	GGCMS Dargirdini	VSN. 51
51	Sajda Bibi	PSHT	8-4-03	GGCMS Dargirdini	GGCMS Jinjirit	VSN. 50
52	Najma Sultana	PSHT	25-08-2011	GGPS Beoribala	GGPS Usaik	VSN. 53
53	Nargis Banu	PSHT	16-06-96	GGPS Usaik	GGPS Beoribala	VSN.52
54	Bibi Farida	PST	16-1-2006	GGPS Kesu Payeen	GGPS Tak Kaldam	VSN. 55
55	Bibi Hasina	PST	8-04-2003	GGPS TakKaldam	GGPS Kesu Payeen	VSN. 54
56	Khosh kai	PST	14-12-2009	GGPS Sweer	GGCMS Jinjirit	VSN. 57
57	Malika Husain	PST	12-5-04	GGCMS Jinjirit	GGPS Sweer	VSN.56
58	Nazli Fathathi	PST	24-11-2010	GGPS Arandu	GGCMS Dargirdini	VSN. 59
59	Dilshad Bibi	PST	03-09-2007	GGCMS Dargirdini	GGPS Arandu	VSN. 58
60	Khadija	SPST	01-08-99	GGPS Sheratti	GGPS Usaik	VSN. 61
61	Lala Rukh	PST	31-10-95	GGPS Usaik	GGPS Shiratti	VSN. 60
62	Haji Bibi	PSHT	1-08-2010	GGCMS Beoribala	GGPS Shahinigar	VSN. 63
63	Tahira Bibi	PSHT	13-09-2006	GGPS Shahinigar	GGPS Beori Bala	VSN. 62
64	Naheed Ara Begum	PSHT	4-8-2011	GGPS Lasht Shishi	GGPS Drosh	VSN. 65
65	Razia Khatoon	PSHT	2-08-2010	GGPS Drosh	GGPS Lasht Shishi	VSN. 64
66	Shaheena Bibi	PSHT	25-08-2009	GGPS Drosh	GGCMS Jinjirit	VSN. 67
67	Jamila Khatoon	SPST	8-8-2011	GGCMS Jinjirit	GGPS Drosh	VSN. 66
68	Farkhanda Naz	SPST	2-12-2002	GGCMS Ayun	GGPS Darkhanandeh Ayun	VSN. 69
69	Zahanat jabeen	SPST	2-12-2002	GGPS Darkhanandeh Ayun	GGCMS Ayun	VSN. 68
70	Almas Saba	PST	24-11-2010	GGPS Birir	GGCMS Ayun	VSN. 71
71	Khurshid Jahan	PSHT	1-08-97	GGCMS Ayun	GGPS Birir	VSN. 70
72	Asmar Bibi	PSHT	01-03-2010	GGPS Bumborate	GGPS Dair Ayun	VSN. 73
73	Fehmina Bibi	PSHT	03-04-2003	GGPS Dair Ayun	GGPS Bumborat	VSN.72
74	Bibi Asia	PST	13-09-2006	GGPS Muldeh Ayun	GGPS Darkhandeh Ayun	VSN. 75
75	Mehtab Jabeen	PSHT	19-08-06	GGPS Darkhandeh Ayun	GGPS Muldeh Ayun	VSN. 74
76	Latifa Banu	PST	25-08-2010	GGPS Birga Bala	GGPS Madaklasht	VSN. 77
77	Amrozia Jahan	PST	8-8-2010	GGPS Madaklasht	GGPS Birga Dam	VSN. 114
78	Bibi Zakia	PSHT	25-08-2011	GGPS Ursoon	GGPS Jughoor	VSN. 79
79	Rukhsana Rubi	SPST	5-03-06	GGPS Jughoor	GGPS Shahinigar	VSN.80
80	Sajeeda Bibi	PSHT	13-09-2006	GGPS Shahinigar	GGCMS Jinjirit	VSN. 81
81	Habiba Khalil	PST	15-12-2006	GGCMS Jinjirit	GGPS Ursoon	VSN. 78
82	Zulikha Bibi	SPST	19-06-2009	GGPS Tholiandeh Ayun	GGPS Honedehar	VSN. 83
83	Shahnaz Bibi	PSHT	20-11-2007	GGPS Honedehar	GGCMS	VSN. 82

ATTENDED  
 [Signature]  
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					Tholiandeh Ayun	
35	Hashmat Ara	PSHT	5-9-2011	GGPS Patinagar	GGPS Muldeh	VSN. 85
	Muslima Qayum	PST	1-08-2009	GGPS Moldeh	GGPS Potniandeh	VSN. 86
36		PSHT	1-8-2011	GGCMS Jinjirat	GGPS Patinagar	VSN 84
37	Iqbal U Nisa	PSHT	1-08-2009	GGPS Lawi	GGPS Shiaqotak	VSN. 88
38	Rukhsana Bibi	PSHT	2-08-2007	GGPS Shiqotak	GGPS Lawi	VSN. 87
39	Albina Taj	PSHT	8-04-03	GGPS Tak Kaldam	GGPS Moldeh	VSN.91
90	Saira Banu	PST	16-8-2008	GGPS Sore Rech	GGSP Ariyan	Based on high enrolment till sanction of additional post
91	Laghihoor	SPST	1-05-09	GGPS Muldeh	GGPS Moroi Bala	Against Naushad
92	Khalida Bibi	PSHT	7-09-2003	GGCMS Dargirdini	GGPS Tak kaldam	VSN. 89
93	Nusrat Jabeen	PST	29-10-2011	GGPS Bumborat	GGPS Jughoor	VSN. 94
94	Saeeda Bibi	PSHT	1-08-2007	GGPS Jughoor	GGPS Moldeh Ayun	VSN.95
95	Haseena Bibi	PSHT	1-08-97	GGPS Muldeh Ayun	GGPS Bumborat	VSN. 93
96	Rifat Nahar	PST	16-9-13	GGPS Birir	GGPS Chumurkon Koh	VSN.97
97	Malka Bibi	PSHT	6-11-94	GGPS Chumurkon Koh	GGPS Tholiandeh Ayun	VSN.98
98	Tila Bibi	PSHT	4-09-97	GGPS Tholiandeh Ayun	GGPS Birir	VSN.96
99	Shahnaz Bibi	PSHT	1-12-1995	GGPS Broze Kore	GGPS Jughoor	VSN.100
100	Jamila Parveen	PSHT	20-11-2007	GGPS jughoor	GGPS Broze Kore	VSN.99
101	Farzana Yasmin	PSHT	17-6-2009	GGPS Wahat	GGPS Murdan	VSN.102
102	Safia Bibi	SPST	15-6-2009	GGPS Murdan	GGPS Utrai	VSN.103
103	Shamim Nazli	SPST	26-4-1996	GGPS Utrai	GGPS Wahat	VSN. 101
104	Bibi Fatiha	PST	30-08-2012	GGPS Chumuruk	GGPS Koghuzi Payeen	VSN.105
105	Bibi Samina	PST	1-03-2010	GGPS Koghuzi Payeen	GGPS Chumuruk	VSN. 104
106	Jan Khonza	PST	20-8-2004	GGPS Hondahar	GGPS Barenis Bala	Against Fazli Jahan <i>Pay Stop</i>
107	Maqsooda	PST	13-10-2011	GGPS Lone Bala	GGPS Hondahar	VSN. 106
108	Shahnaz	PSHT	15-11-2007	GGPS Khot Bala	GGPS Bakarabad	Based on High enrolment till the sanction of additional post in rationalization
109	Zar Begum	PST	16-10-2006	GGPS Z. Gram	GGPS Ariyan	Against Hamida <i>Pay Stop</i>
110	Bibi Ayesha	PST	14-8-2008	GGPS Shahbronze	GGPS Wahat	Against Baghicha <i>Pay Stop</i>
111	Nafeesa Gui	PST	1-8-2009	GGPS Potniandeh	GGPS Kesu Dap	Transferred to GGPS Kesudap

Ann<sup>u</sup> B<sup>y</sup>

AN  
ACT

CTC  
F. J. M.

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*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.*

**ATTESTED**

**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.

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*Prof. J. H. Khan*

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(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;

**ATTESTED**

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- (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.

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(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:

(19)

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.

**ATTESTED**

(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 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.

ATTESTED

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.

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(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.

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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.  
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Amira Qayum	SPST	18-04-2012	GGPS Birgabala	GGPS Potniandeh	Transferred to GGPS Potniandeh
Mussun Ara	PST	1-8-2004	GGPS Birga Dam	GGPS Birga Bala	VSN. 76

ATTACHED  
Zehra Jalal

Note:

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

(ZEHRA JALAL)

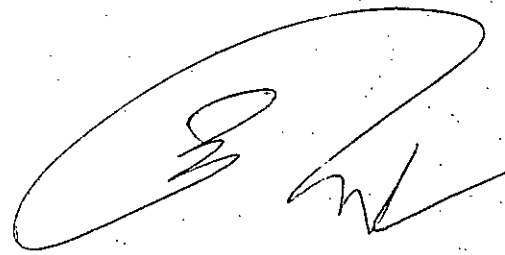
District Education Officer (Female)  
Chitral

Endst: No. 4153-4392 /EB (F) T-/

Dated Chitral the 26 / 7 /2014

Copy of the above is forwarded for information to the:--

1. District Accounts Officer Chitral
2. In-charge Concerned
3. DEMIS Local Office
4. Officials Concerned
5. Teachers Concerned



District Education Officer (Female)  
Chitral

Annexure - C - 2

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OFFICE OF THE D

No. 4640

ION OFFICER (FEMALE) CHITRAL  
Primary Rationalization 2014-15.

Dated 23<sup>rd</sup> August, 2014

**ATTESTED**

**ATTESTED**

*[Handwritten Signature]*

To

The Director (E&S) Education  
Khyber Pakhtunkhwa, Peshawar.

Subject:- Adjustment of PSTs (Female) after Rationalization 2014-15 @ ratio of 1:40 District Chitral.

Memo:

I have the honour to submit adjustment of PSTs based on rationalization @ Ratio of 1:40 for the year, 2014. Post of PSTs were shifted, created and adjusted based on enrolment in the following schools under the rule of rationalization of Education Department Khyber Pakhtunkhwa.

Sr	Name Of School	Name of teacher	Date of 1 <sup>st</sup> Appoint.	Name of Surplus teacher	Adjusted to	Remarks
1	GGPS Chitral	JahanKhurshid	13-7-85			
		ShamimIjaz	11-4-88			
		ShamimAra	23-9-89			
		TahiraJabeen	7-2-89			
		SharifaBibi	17-06-93	SharifaBibi	GGPS Bakerabad	In additional post
		Nargis Begum	7-06-95	Nargis Begum	GGPS Shahingar	In additional post
2	GGPS Mustajapandeh	AlbinaTaj	2-17-94	AlbinaTaj	GGPS Broz Domoon	In additional post
		Siasat Gul	1-11-95			
		ShahnazBibi	25-8-2004			
3	GGPS Bakamak	KishwarParveen	14-10-2003	KishwarParveen	GGPS Tekkaldam	In additional post
		BibiTaj	28-10-84			
		Nasim Akhtar	11-3-85			
4	GGPS Moghlandeh	Riaz Begum	15-05-95	Riaz Begum	GGPS BrozeDomoon	In addition post
		Shamim Akhtar	11-4-88			
		NaheedKishwar	15-8-95			
		NargisBibi	12-11-94			
5	GGPS Khorkashandeh	Farida	14-11-94	Farida Bibi	GGPS Broze	In addition post
		SaminaBibi	14-11-83			
		Maryam Bibi	26-6-95			
		Haji Yar	2-12-2002			
		ZeenatBibi	28-8-94	ZeenatBibi	GGPS Drosh	In addition post

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OFFICE OF THE DISTRICT EDUCATION OFFICE (FEMALE) CHITRAL

No. 4640 / Primary Rationalization 2014-15.

Dated: 21<sup>st</sup> August, 2014**TESTED**

TO:

The Director (E & S) Education  
Khyber Pakhtunkhwa, Peshawar.Subject: Adustment of PSTs (Female) after Rationalization 2014-15 @ ration of 1:40 District Chitral.

Memo:

I have the honour to submit adjustment of PSTs based on rationalization @ Ratio of 1:40 for the year, 2014. Post of PSTs were shifted, created and adjusted based on enrolment in the following schools under the rules of rationalization of Education Department Khyber Pakhtunkhwa.

S #	Name of School	Name of Teacher	Date of Ist Appoint.	Name of Surplus Teacher	Adjusted To	Remarks
1	GGPS Chitral	Jahan Khurshid				
		Shamim Ijaz				
		Shamim Ara				
		Tahira Jabeen				
		Sharifa Bibi		Sharifa Bibi	GGPS Bakerabad	In additional Post
		Nargis Begum		Nargis Begum	GGPS Shahinigar	In additional Post
		Albina Taj		Albina Taj	GGPS Broz Domoon	In additional Post
2	GGPS Mustajapandeh	Siasat Gul				
		Shahnaz Bibi				
		Kishwar Parveen		Kishwar Parveen	GGPS Tekkaldam	In additional Post
3	GGPS Bakamak	Bibi Taj				
		Nasim Akhtar				
		Riaz Begum				
4	GGPS Moghladeh	Shamim Akhtar		Riaz Begum	GGPS Broze Domoon	In additional Post
		Naheed Kishwar				
		Nargis Bibi				
		Farida		Farida Bibi	GGPS Broze	In additional Post
5	GGPS khorkashandeh	Samina Bibi				
		Maryum Bibi				
		Haji yar				
		Zeenat Bibi		Zeenat Bibi	GGPS Drosh	In additional Post

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6	GGPS Hondahar	Nasim Akhtar	22-8-89			
		Zulaikha	14-11-94			
		RahmatNisa	4-12-2009			
		Muslima	4-12-2009			
		Maqsooda	13-10-2011	Maqsooda	GGPS Arandu	In addition post
7	GGPS BarenisBala	Jan Khonza	1-3-93			
		Bibi Akhtar	24-8-2004	Surplus	GGSP Potenlandeh	In addition post
8	GGPS ChumurkonKoh	TasnimGulab	16-6-2014	Apptt: NTS		
		Yasmin Bibi	1-4-88			
		Nargis RiffatNihar	23-9-89			
			16-10-2005	Surplus	GGPS Kalkatak	In addition post
9	GGPS Jughoor	SurayaBibi	18-11-85			
		ShahnazBibi	30-11-94			
		Zakia	8-11-85			
		ZahidaJahan	10-7-89			
		NusratJabeer	25-11-2010	Surplus	GGPSKalkatak	In addition post
10	GGPS Goldur	Talima Aziz	16-6-2014	Apptt: NTS		
		ShahnazBibi	1-7-88			
		Jabeen	8-8-87			
		Baitul Jamal	15-4-85			
		NahidaParveen	18-8-2008	Surplus	GGPS Ashirat	In additional post
11	GGPS Wahat	SardarBibi	1-4-88			
		SafiaBano	1-11-88			
		ShamimNazli	1-12-88	Surplus	GGPS SafidArkarl	Against vacant post
		Ayesha	14-8-2008	Surplus	GGPS Sweer	In additional post
12	GGPS Singoor	Miraj Gul	11-4-1985			
		Mehnaz jabeen	30-11-1994			
		Safia	14-11-2006	Surplus	GGPS Arandu lasht	In additional post
13	GGPS Kalkatak	ZuhaidaJahan		Was on temporary duty	GGPS Madaklasht	In additional post
14	GGPS Sore Rech	SairaBano	13/11/2008	Surplus	GGSP Arandu	In additional post
15	GGPS Lone Koh	ZakiraBibi	25/11/2010	Surplus	GGSP Arandu	In additional post
16	GGPS Koht Bala	ShahnazBibi	1/7/1985	Surplus	GGSP Arandu	In additional post
17	GGPS Awi	Baghica Bibi	16/11/2000			
		Gulshan Bibi	2/11/1995	Pa. Jun Nisa	GGPS Kushum Bala	
		Faizun Nisa	8/11/1999			

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6	GGPS Hondahar	Nasim Akhtar							
		Zulalkha							
		Rahmat Nisa							
		Muslima							
		Maqsooda	Maqsooda						
7	GGPS Barenis	Bibi Akhtar	Surplus						
		Tasnim Gulab		Appt: NTS					
8	GGPS Chumrkon Koh	Yasmin Bibi							
		Nargis							
9	GGPS Jughoor Koh	Suraya Bibi							
		Shahnaz Bibi							
10	GGPS Goldur	Shahnaz Bibi							
		Jabeen							
11	GGPS Wahat	Sardar Bibi							
		Nahida Parveen	Surplus						
12	GGPS Singoor	Miraj Gul							
		Ayesha	Surplus						
13	GGPS Kalkatak	Zubaida Jahan	Was on temporary duty						
		Safia	Surplus						
14	GGPS Sore Rech	Saira Bano	Surplus						
		GGPS Arandu							
15	GGPS Lone Koh	Zakira Bibi	Surplus						
		GGPS Arandu							
16	GGPS Koh Bala	Shahnaz Bibi	Surplus						
		GGPS Arandu							
17	GGPS Awi	Baghicha Bibi							
		Gulshan Bibi							
		Farzun Nisa							
		GGPS Kushum Bala							

**TESTED**

Dated: 22-11-2016 - step 1

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) CHITRAL

OFFICE ORDER

Adjustment of the following PST/SPST/PSHT is here by ordered in the schools noted against their name below with immediate effect in the best interest of public service.

ATTESTED

S.No	Name of schools	Name of Teachers	BPS	Remarks
1	GGCMS Chomurkon	Maqsood Rana	16	Retained
		Nehri Luban	14	Retained
		Bibi Amina	12	Retained
		Nargis Banu	12	Retained
		Shahzadi Bilqees	12	Retained
		Nasreen (GGPS Kishum Payeen)	14	Adjustment Policy
2	GGCMS Moroi Bala	Romana Andaleeb	12	Retained
		Fakhrun Nisa	17	Retained
		Bibi Moor	14	Retained
		Haseen Banat	14	Adjustment Policy
		Safoora	14	Adjustment Policy
3	GGCMS Garam Chashma	Samina Bibi	12	Adjustment Policy
		Zahida Bibi	16	Retained
		Irshad Parvaiz	14	Adjustment Policy
		Gul Sifat	14	Adjustment Policy
		Naznin Tahra	12	Retained
		Bibi Amina	12	Retained
4	GGPS Ariyan	Noor Jahan	12	Retained
		Sakina Bibi	15	retained
		Saira Banu	12	Adjustment Policy
5	GGPS Bakamak	Zar Begum	12	Retained
		Bibi Taj	15	Retained
6	GGPS Bakerabad	Maqsooda	12	Adjustment Policy
		Bibi Sharifa	15	Retained
		Hanida Bibi	14	Adjustment Policy
		Asma Ansari	12	retained
7	GGPS Balach	Zakira Bibi	12	Adjustment Policy
		Shabi Khooban	15	Retained
		Shahida Bibi (Sore rash)	12	Adjustment Policy
		Saima Bibi	15	retained

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8	Bashqar Bala	Jahan Parvez	14	retained
9	GGPS Barenis Bala	Mushrifia Bibi	15	Adjusment Policy
		Bibi Akhtar <sup>NTS</sup> To Sneeem Gul	12	Adjusment Policy
10	Barenis Payeen	Tahlira Bibi	15	Retained
		Abida Ashraf	12	Retained
11	GGPS Chitral	Jahan Khurshid	15	Retained
		Hasimat Ara	14	Adjusment Policy
		Rifat Nihar	12	Adjusment Policy
		Bibi Hakima (GGPS Gohkir)	14	Adjusment Policy
12	GGPS Chumurkon Koh	Yasmin	15	Retained
		Salima Begum (GGPS Bang)	12	Adjusment Policy
13	GGPS Chumuruk	Sharafatun Nisa	15	Adjusment Policy
		Nasira Bibi	12	Retained
14	GGPS Denin	Abida Kai <sup>UCI (Khat)</sup>	15	Retained
		Bibi Sadia	14	Retained
		Nasima Bibi	14	Retained
		Gul Bada	12	Retained
		Samia Naz	12	Retained
		Fariha Parvez NTS	12	Retained
15	GGPS Denin Lasht	Zeenat Sarwar <sup>UCI</sup>	15	retained
		Bibi Makhdoma (GGPS Riri Owir)	12	Adjusment Policy
16	GGPS Golder	Shahnaz Begum	15	Reatined
		Jamal (GGPS Balim)	14	Adjusment Policy
		Nahida Parveen	12	Adjusment Policy
17	GGPS Golain Payeen	Shakila	15	Retained
		Aziza Jahan NTS	12	Retained
18	GGPS Hondahar	Nasim Akhtar	15	Retained
		Zulaikha	14	Retained
		Muslima Bibi	12	Retained
19	GGPS Hinjil	Rahmat Nisa	12	Retained
		Zubaida Iqbal	15	Retained
20	GGPS Izghor Golin	Habiba	12	Retained
		Nusrat Bibi	15	Retained
	GGPS Jughoor	Fatiha Bibi	12	Adjusment Policy
		Shahnaz Bibi	15	Retained
		Bibi Zakia	14	Retained

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	Jughoor	Zahida Bibi	14	Retained
		Nusrat Bibi	12	Adjusment Policy
21		Fatima Aziz	12	retained
		Shamsia	15	Retained
22	GGPS Kari	Zaharat Jabeen	12	Retained
		Samina Bibi	15	Retained
23	GGPS Khorakshandeh	Bibi Maryam	14	Retained
		Kishwar Parveen	12	Adjusment Policy
		Khadija Mastoor	15	Adjusment Policy
24	GGPS Koghuzi Bala	Bibi Fatiha	12	retained
		Shahnaz Gul	15	Adjusment Policy
25	GGPS Koghuzi Payeen	Saliha	12	Retained
		Farida Bibi	15	Retained
26	GGPS Kuju	Khurshid Ara	14	Retained
		Pari zartaj	15	Retained
27	GGPS Lotdeh Singoor	Razia Bibi	12	Adjusment Policy
		Saghdia	12	Retained
		Mubarek Bibi	15	Adjusment Policy
28	GGPS Loligram	Anila NTS	12	Retained
		Shamim Akhtar	15	Retained
29	GGPS Moghlandeh	Haji yar	14	Adjusment Policy
		Zeenat	12	Adjusment Policy
		Razia Sultana	15	Retained
30	GGPS Moroi Payeen	Salima Bibi (Drungagh)	14	Adjusment Policy
		Laghli Hoor	15	Adjusment Policy
31	GGPS Moroi Bala	Saeda Bibi	14	Retained
		Zahida Bibi	15	Retained
32	GGPS Moroi Payeen	Fatima Jahan	14	Adjusment Policy
		Farzana Yasmin	15	Retained
33	GGPS Murdn	Safia Bibi	14	Adjusment Policy
		Nasim Akhtar	15	Adjusment Policy
34	GGPS Mustajapandeh	Shahnaz	12	Retained
		Shahnaz Bibi	15	Adjusment Policy
35	GGPS Orghoch	Fatima Bibi	12	Retained
		Rubina NTS	12	Retained
36	GGPS Orghoch Karimabad	Shahnza NTS	12	Retained

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37	GGPS Parabeg	Misri Jamal	15	Adjusment Policy
		Vacant	12	Vacant
38	GGPS Pitragram	Malika Bibi	15	Adjusment Policy
		Rashida	12	Retained
39	GGPS Praycet	Slasat Gul	15	Adjusment Policy
		Bibi Abida	12	Retained
40	GGPS Rabat Arkari	Mehri Jahat ✓	15	Adjusment Policy
		Janan Bibi	14	Retained
41	GGPS Ragh	Saeeda Bibi	15	Adjusment Policy
		Mehnaz Parveen	12	Retained
42	GGPS Safid Arkari	Shamim Nazli	15	Adjusment Policy
		Vacant	12	Vacant
43	GGPS She. Lasht	Sulatna	15	Retained
		Parveen Akhtar	14	Retained
44	GGPS Sha qotek	Iqbal Nisa	15	Retained
		Nelofar Benazir (GGPS Charun)	14	Adjusment Policy
45	GGPS theghoor	Sultan Banu	15	retained
		Salama Bibi	14	Adjusment Policy
46	GGPS Singoor	Miraj Gul	15	Retained
		Safia	12	Adjusment Policy
47	GGPS Seen Lasht	Saira Bibi	15	Retained
		Bibi Ayesha	12	Adjusment Policy
48	GGPS Utrai	Abida	15	Adjusment Policy
		Nasreen	14	retained
		Vacant	12	Vacant
49	GGPS Wahat	Sardar Bibi	15	Retained
		Vacant	12	Vacant
50	GGPS Monoor	Sadia Banu	15	Adjusment Policy
		Farhat Jabeen	12	Adjusment Policy
51	GGCMS Ayun	Rukhsana Parveen	17	Retained
		Zahanat jabeen	14	Retained
		Shamim Akhtar	14	Retained
		Fiaza Shireen	14	Retained
		Almas Saba	12	Retained
		Naila Anwar	12	Adjusment Policy
		Zaibunisa	17	Retained
		Bibi Insia	14	Retained

52	GGCMS Dargirdini	Bibi Kamila (Zanglasht)	14	Retained
		aeedunisa (GGPS Shah Bronze)	14	Adjusment Policy
		lazli Fathathi	12	Retained
		lafisa Bibi	12	Adjusment Policy
		raifunaz	12	Retained
53	GGCMS Jinjirit	Shiasta Samad	16	Retained
		Khadija Bibi	14	Adjusment Policy
		Wahceda (GGPS Ujnu)	14	Adjusment Policy
		Habiba Khalil	12	Retained
		Khosh Kai	12	Retained
54	GGPS Broze Kore	Malika Hussain	12	Adjusment Policy
		Janila Parveen	15	Retained
55	GGPS Broze Berbolik	Rukhsana Rubi	12	Adjusment Policy
		Albina Taj	15	Adjusment Policy
56	GGPS Broze Domooon	Bibi Khalida	12	Retained
		Farhat Bibi	15	Retained
57	GGPS Goldeh Broze	khadija Bibi	12	Retained
		Farzana Nusrat	12	Adjusment Policy
58	GGPS Ghariatte	Zeba Pari	15	Retained
		Shakila banu	12	Retained
59	GGPS Dair Ayun	Shamshad Begum	15	Adjusment Policy
		Hussun Bibi	12	Retained
60	GGPS Shughor Ayun	Taqdir Jamal	15	Retained
		Bibi Fahima (GGPS Istaru)	14	Adjusment Policy
61	GGPS Darkhandeh Ayun	Tasmeem Zehra	12	Retained
		Bibi Hasina	15	Adjusment Policy
62	GGPS Sahan Bala Ayun	Jamshida Bibi	12	Retained
		Khurshid Jahan	15	Adjusment Policy
63	GGPS Moldeh Ayun	Bibi Asia	12	Retained
		Saira Nargis	15	retained
64	GGPS Tholiandeh Ayun	Bibi Jahan Ara	14	retained
		Essa Jamal	15	Retained
64	GGPS Tholiandeh Ayun	Farman Jamal (GGPS Warijun)	14	Adjusment Policy
		Jan Khonza	12	Adjusment Policy
		Asmar Bibi	15	Adjusment Policy
64	GGPS Tholiandeh Ayun	Sakina Bibi (GGPS Washich)	14	Adjusment Policy
		Tahira Habib	12	retained

ATTESTED

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65	GGPS Bumboorat	Fehmina Parveen	15	retained
		Vacant	12	Vacant
66	GGPS Abani	Mehtab Jabeen	15	Adjustment Policy
		Vacant	12	Vacant
67	GGPS Birir	Tila Bibi	15	Retained
		Vacant	12	Vacant
68	GGPS Kesu Payeeh	Bibi Hamida	15	Adjustment Policy
		Shehla Sayyed (NTS)	12	Retained
69	GGPS Kesu Dap	Sadia Usman	15	Retained
		Bibi Saeeda	12	Adjustment Policy
70	GGPS Lawi لاوي	Rehana Shafqat	15	Retained
		Farzana (GGPS Muzhgram Melp)	14	Adjustment Policy
71	GGPS Lasht Shisai	Zainab Bibi	15	Retained
		Bibi Zar Jamal (GGPS Mastuj)	14	Adjustment Policy
72	GGPS Shahi Nigar	Haji Bibi	15	Retained
		Talira Bibi	14	Retained
		Shahida Sultan (Warkop)	14	Adjustment Policy
73	GGPS Tak kaldam	Khalida Bibi	15	Retained
		Bibi Hasina	14	Adjustment Policy
		Bibi Farida	12	Retained
74	GGPS Pomalandeh	Bibi Shahina	15	Adjustment Policy
		Sailia Qayum	14	Retained
		Bibi Sharifa (GGPS Sahat)	14	Adjustment Policy
75	GGPS Asper Damal	Bibi Shahmarz <i>Qmi UC</i>	15	Retained
		Bibi Shahina	12	Retained
76	GGPS SwatoDomal	Zumrat Bibi	15	Adjustment Policy
		Bibi Hamida	12	Retained
77	GGPS Lachi Gram	Vacant	12	Vacant
		Vacant	12	Vacant
78	GGPS Arandu	Dilshad Begum	15	Retained
		Ghazala Andaleeb	12	Adjustment Policy
		Vacant	12	Vacant
79	GGPS Arandu Lasat لاوي سے ارندو لاسٹ	Naheed Kishwar	15	Adjustment Policy
		Ghufrania Bibi	14	Retained
		Vacant	12	Vacant
80	GGPS Pati Nagar	Muslima Qayum	15	Retained
		Bibi Kulsoom	14	Retained

WITNESSED

*[Signature]*

81	GGPS Asheriatte	Mehr Nigar	15	Retained
		Zahida Parveen	12	Retained
		Shamsoora	12	Retained
82	GGPS Budugal	Nasreen Parveen	15	Retained
		Nasreen Parveen	12	Retained
83	GGPS Sweer	Nahced Ara Begum	15	Adjusment Policy
		Sameera Aftab	14	Retained
		Shugfta Jabeen	12	Retained
84	GGPS Ursoon	Nasim Akhtar	15	Retained
		Bibi Fatima (NTS)	12	Retained
85	GGPS Sheradash	Sarwat Irshad	15	Adjusment Policy
		Sultan Haram	12	Retained
86	GGPS Tar Shishi	Bibi Shahida	15	Retained
		Bibi Maryam	14	Retained
87	GGPS Shiratti	Nasim Banu	15	Adjusment Policy
		Mastoora Jahan	12	Retained
88	GGPS Birga Bala	Sajida Bibi D/O M. Ali Khan	15	Adjusment Policy
		Amrozia Jahan	12	Retained
89	GGPS Birga Dam	Sajida Bibi D/O M. Karim Khan	15	Adjusment Policy
		Hussun Ara	12	Retained
90	GGPS Madaklasht	Zubaida Jahan	15	Adjusment Policy
		Bib Naz	14	Retained
		Jamshida Jahan	12	Retained
91	GGPS Khorandok	Kawsar Parveen	15	Retained
		Bibi Jahan Ara	12	Retained
92	GGPS Kalkatak	Razia katoon	15	Adjusment Policy
		Dilshad Bibi	14	Retained
		Zarin Bibi	14	Adjusment Policy
		Bibi Samina	12	Retained
93	GGPS Usaik	Najma Sultana	15	Retained
		Lala Rukh	12	Adjusment Policy
94	GGPS Beori Bala	Nargis Banu	15	Retained
		Vacant	12	Vacant
		Khonza Pari	15	Retained
		Safia Kawsar	14	Retained
		Jamila Khatoon	14	Retained
		Muhsina (GGPS Shagram)	14	Adjusment Policy

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 20/11/20

95	GGPS DROSH	Bibi Nasreen (Shagram Daghar)	14	Adjusment Policy
		Minhas Jabeen	12	Retained
		Sajida Bibi	12	Retained
		Latifa Banu	12	Adjusment Policy
		Hooran Bibi	16	Retained
96	GGCMS WARIJUN	Muntakhab (GGPS Warijun)	14	Retained
		Saifura bibi	14	Retained
		Bibi Firdausi	12	Retained
		Khonza	12	Retained
		Bibi Nasima	12	Adjusment Policy
97	GGPS AWI BOONI	Baghicha	15	Retained
		Gulshan	14	Retained
98	GGPS Balim	Rukhsana Parveen	15	Retained
		vacant	12	Vacant
99	GGPS BANG	Badshah Zarin	15	Adjusment Policy
		Sakina bibi	14	Retained
100	GGPS BARUM KAGH	Noor jahan	15	Retained
		Noushad Youns	14	Retained
101	GGPS BOONI	Safina bibi	15	Retained
		Shamim akhter	14	Retained
102	GGPS BOONI GOAL	Shahina bibi	15	Retained
		Abida Nasreen	14	Retained
103	GGPS BOONI PAYEEN	Hosina Bibi	15	Adjusment Policy
		Sader Bibi	14	Retained
104	GGPS BREP	Gulzar Jamal	15	Retained
		Bibi Hamida	14	Retained
		Zainab Jamal	12	Retained
105	GGPS CHARUN	Suraya Begum	15	Adjustment policy
		vacant	12	Vacant
106	GGPS CHARUN OW R	Shamim Ara	15	Adjustment policy
		Nuhria Bibi	14	Retained
107	GGPS CHUINJ	Zuickha Bibi	15	Retained
		Hoor Nisa	14	Retained
		Bibi Nama	12	Adjustment policy
108	GGPS DIZG	Bibi Hawala	15	Retained
		Rubina	14	Retained

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ATTESTED

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109	GGPS DRUNGAGH	Halima Parveen			
		vacant	15	Adjustment policy	
110	GGPS GAHT BALA	Irshad Parveen	12	Vacant	
		Gulnar	15	Adjustment policy	
111	GGPS GOHKIR	Shamim Ara	12	Retained	
		Shahina Bibi	15	Adjustment Policy	
		Ahina Bibi	14	Retained	
112	GGPS HERCHIN	Nasreen Bibi	12	Adjustment policy	
		Dinar Begum	15	Adjustment policy	
		Zahida Bibi	14	Retained	
113	GGPS ISTACH	Rahinda Begum	14	Retained	
		Margat Bibi	15	Adjustment policy	
114	GGPS ISTARU	Mehnaz Jabeen	14	Retained	
		Sajia Bibi	15	Adjustment policy	
115	GGPS KHOT BALA	Farman Bibi	12	Adjustment policy	
		Meraj Bibi	15	Retained	
		Masima Khalil	14	Retained	
		Hajima Bibi	12	Adjustment policy	
116	GGPS KHOT PAYEEN	Nazuk Bibi	12	Adjustment policy	
		Dilshad Bibi	15	Retained	
		Zulekha Bibi	14	Adjustment policy	
117	GGPS Khuzh	Rabia NTS	12	Retained	
		Bibi Noor NTS	12	Retained	
118	GGPS KOSHT BALA	Shawkat Ara	12	Retained	
		Bibi Hawa	15	Retained	
		Shakila Naz	14	Retained	
119	GGPS KOSHT PAYEEN	Bibi Nasreen	12	Retained	
		Sardar Bibi	15	Retained	
		Gul Hawa	14	Adjustment Policy	
120	GGPS KURAGH	Bibi Zahida	12	Adjustment Policy	
		Habiba	15	Retained	
121	GGPS KUSHUM BALA	Bibi Saceda Naz	14	Adjustment policy	
		Faizun Nisa	15	Retained	
		Bibi Shahida	14	Retained	
		Bibi Saeeda	12	Retained	
122	GGPS KUSHUM PAYEEN	Shahida Akhtar	12	Retained	
		Sakina Bibi	15	Adjustment Policy	
			12	Retained	



123	GGPS LOLAMI TERICH PAYEEN	Khurshid Bibi	15	Adjustment Policy
		Bibi Sharifa	12	Retained
124	GGPS LONE	Zajbun Nisa	15	Retained
		Khuban Nisa	14	Retained
		Nusrat Abida	12	Retained
		Bibi Zulkhya	12	Retained
125	GGPS LONE BALA	Rehman Jamal	15	Adjustment policy
		Gul Yusuf	14	Retained
126	GGPS LONKOH TERICH	Farhat rshad	15	Adjustment Policy
		vacant	12	Vacant
127	GGPS MADAK	Amna Bibi	15	Retained
		Saira Bibi	14	Adjustment policy
		Zahida Bibi	12	Adjustment policy
		Zulhaja	14	Adjustment policy
		Sifat Jamal	12	Retained
		vacant	12	Vacant
128	GGPS MASTUJ	Riaz Eragum	15	Adjustment policy
		Rubina NTS	12	Retained
129	GGPS Meragram 2	Basmati Gul NTS	12	Retained
		Mas'um Jamal NTS	12	Retained
130	GGPS SHOT MELP	Mu'rat Ilahi NTS	12	Retained
		Vacant	12	Vacant
131	GGPS MORDER	Baqul Jamal	15	Adjustment policy
		Nor Nisa	14	Retained
		Jarila Banu	12	Retained
		Sahra Gul	14	Retained
132	GGPS Mul Rech	Farhan Banu NTS	12	Retained
		Zahida Rehman NTS	12	Retained
133	GGPS MUZHEEN OWIR	Vacant	12	Retained
		Vacant	12	Retained
134	GGPS MUZHIGOL	Nasreen Jamal	15	Retained
		Mehrun Nisa	14	Retained
		Vacant	12	Vacant
135	GGPS MUZHGRAM MELP	Ume Habiba	14	Retained
		Shahzadi Nargis	15	Adjustment Policy
		Bibi Hamida NTS	12	Retained
		Mehrab Gul	15	Retained

**ATTENDED**  
*[Signature]*

4/11/19

136	GGPS NICHAGH OWIR	vacant	12	Against 12
137	GGPS NISHKU BALA	Rabia Bibi	15	Adjustment Policy
		Bibi Fatima	12	Retained
138	GGPS NISHKU PAYEEN	Zahida Begum	15	Adjustment Policy
		Shakira Bibi	12	Retained
139	GGPS NOGRAM	Bibi Rashida	15	Adjustment policy
		Bibi Shahida	14	Retained
		Nusrat Jamal	12	Retained
140	GGPS PAKHTURI OWIR	Zubeda Bibi NTS	12	Retained
		Rashida Banu NTS	12	Retained
141	GGPS PARKUSAP	Shakira Bibi	15	Retained
		Taqid	12	Retained
142	GGPS PARPISH	Bibi Sabira	15	Retained
		vacant	12	Vacant
143	GGPS PARWAK	Mumtaz Bibi	15	Retained
		Hamida Bibi	12	Adjustment policy
144	GGPS RAYEEN	Bibi Shahida	15	Retained
		Shahida Bibi	14	Retained
145	GGPS RECH RAGH	Samina Yasmeen NTS	12	Retained
		Nusrat Bibi NTS	12	Retained
146	GGPS RESHUN	Nowshad Begum	15	Adjustment Policy
		Fazli Jahan	12	Retained
147	GGPS RESHUN GOLE	Bibi Aysha	15	Retained
		Sania Gul	14	Adjustment policy
148	GGPS RESHUN RAGHEN	Karima	15	Retained
		Razia Banu	14	Retained
149	GGPS RIRI OWIR	Fanshida	15	Adjustment policy
		vacant	12	Vacant
150	GGPS SAHT	Baitul Jamal	15	Adjustment policy
		Bibi Abida	14	Retained
		Marjan	12	Retained
		Nahida	12	Retained
151	GGPS SARGHOZ	Bibi Khadija	15	Retained
		Parveen Bibi	14	Retained
		Jabeen	15	Adjustment policy

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152	GGPS SHAGRAM	Bibi Najma (NTS)	12	Retained
153	GGPS SHAGRAM DAGHAR	Muzrifa	15	Adjustment policy
		Shahri Gul (NTS)	12	Retained
154	GGPS Shali Bronze	Nargis Bibi	15	Adjustment policy
		Nilpfer	12	Retained
155	GGPS SHAIIDAS	Margast	15	Retained
		Arjumand Hamida	14	Adjustment policy
156	GGPS SHOGRAM	Gul Sana	15	Retained
		Bibi Ruqia	14	Retained
157	GGPS SHOTKHAR	Bibi Muhima	15	Retained
		Rehana Parveen	14	Retained
		Rajuli Bibi	12	Retained
158	GGPS SONOGHOR	Farman Nisa	15	Retained
		Sultania	12	Retained
159	GGPS SORE LASPUR	Bibi Gul	15	Adjustment policy
		Mas Bibi	14	Retained
		Bibi Shahri Zarin	12	Retained
160	GGPS SORECH	Bibi Suraya	15	Adjustment policy
		vacant	12	Vacant
161	GGPS TERICH PAYEEN	Shams Bibi	15	Retained
		Farida Bibi	12	Retained
162	GGPS UJNU	Bibi Ahina	15	Adjustment policy
		Gul Badian	12	Retained
163	GGPS WARIJUNE	Qima Bibi	15	Adjustment policy
		Bibi Shahida	14	Retained
		Sakina Bibi	12	Retained
164	GGPS WASHICH	Javeed	15	Adjustment policy
		Vacant	12	Vacant
165	GGPS WERKUP	Nargis Begum	15	Adjustment policy
		Maglifira Naz NTS	12	Retained
		Bibi Arabia	14	Adjustment policy
166	GGPS WERKUP ZINDROLY	Sartajun Nisa	15	Adjustment policy
		Eida Bibi	12	Retained
167	GGPS ZAINI	Sabina Bibi	15	Retained
		Zarina Bibi	12	Adjustment policy

ATTENDED  
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168	GGPS ZAIT	Sifat Bibi	15	Retained
		Bibi Shahira	12	Retained
169	GGPS ZANGLASHT	Bibi Farida	15	Adjustment policy
		vacant	12	Vacant
170	GGPS ZAZDI	Shahnaz Bibi	15	Retained
		Bibi Marhaba NTS	12	Retained
171	GGPS ZONDORANGRAM	Bibi Saeeda	15	Retained
		Sardar Begum	12	Adjustment policy
172	GGPS Raman	Hazara Bibi	15	Adjustment policy
		Vacant	12	Vacant
173	GGPS Khurusum	Misran Bibi	15	Adjustment policy
		vacant	12	Vacant

RECEIVED  
 District Education Officer  
 Chitral

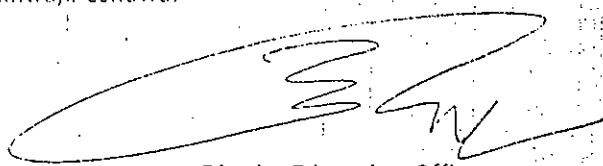
Note: 1. Charge report should be submitted to all concerned  
 2. No T/A D/A is allowed

(Zehra Jalal)  
 District Education Officer  
 (Female) Chitral

Endst: No. 8308-88 Dated Chitral, the 22 / 11 / 2014

Copy of the above is forwarded for information and necessary action to the:

1. Director of E&S Education Khyber Pakhunkhwa, Peshawar
2. District Account Officer Chitral
3. SDEOs (Female) Concerned
4. DMO Chitral
5. Teacher concerned

  
 District Education Officer  
 (Female) Chitral

(Circular stamp)

Amir D... (Handwritten signature)

6072 / F No.

Dated Chitral the 28 / 10 / 2014

From:

The District Education Officer,  
(Female) Chitral

To,

The Secretary,  
Elementary & Secondary Education Department  
Govt. of Khyber Pakhtunkhwa Peshawar.

ATTESTED (Stamp)

Subject:

COMPLAINT

Memo:-

It is requested that after the reception of the attached complaint from Israrud Din General Secretary PTI Education Monitoring Committee Chitral. The undersigned conducted an enquiry committee to enquire the matter.

Enquiry Committee have submitted their report to this office vide No. 113 dated 29-09-2014.

The undersigned is unable to decide the case under your kind instruction issued vide your office memo: no. SO (PE) 4-5/Meeting/2013/Transfer/posting dated 10-09-2014.

It is therefore requested that in the light of the attached enquiry report further guidance in this regard may kindly be issued to this office, so that the undersigned may able to decide the case, please.

Signature of District Education Officer,  
(Female) Chitral

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Process on file

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10/11/14

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Signature  
10/11/14

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10-11-14

Signature  
11/11

TOEEL

Signature

Signature

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*Amir Gul* (circled)



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT  
No. SO(PE)E&SED/1-6//Chitral /2014  
Dated Peshawar the 19-11-2014

To,

The Director,  
Elementary & Secondary Education,  
Khyber Pakhtunkhwa, Peshawar.

**ATTESTED**

Subject:- COMPLAINT.

I am directed to refer to the subject noted above and to enclose herewith a copy of letter No. 6072/E.No dated 28-10-2014 received from DEO (F) Chitral along with its enclosures and to state that notifications pertaining to the posting / transfer of PST may be communicated to the DEO concerned as well as to all DEOs.

Encl: As Above:

*Zamin Khan Momand*  
(ZAMIN KHAN MOMAND)  
SECTION OFFICER (PRIMARY)

سنگھری جرنل

ذریعہ DECO (فون) جرنل

انکوائری رپورٹ

ATTESTED

1- میں محمد انکوائری عمران حکیم ڈسٹرکٹ ایگریکیشن آفیسر زمانہ جرنل اور ڈی ایچ ساس کے مطابق بی بی امیرہ PSI کے بارے میں PSI اور درویشی شہناز بی بی PSI کے انکوائری کے سلسلے میں 1995ء میں دہلی ڈسٹرکٹ میں بروز جمعہ بوقت 9 بجے انکوائری Conduct کیا ان سے انکوائری کیا گیا۔ جو کہ لکھی ہے۔ اور ان کے Documents کی تصدیق کی گئی۔

1- جس کے مطابق عسکریہ کا نمبر 197 اور بی بی امیرہ PSI جو کہ تحصیل نرگور کے اصل باشندگان ہیں۔ جن کے شناختی کارڈ اور ڈوسیاٹیل حال ہی میں جرنل فریڈ آجہ میں سے نام پر بالترتیب مورخہ 28-05-2014 اور 29-09-2014 کو بنائے گئے ہیں۔

2- جبکہ درویشی شہناز بی بی PSI جو کہ تحصیل نرگور کا اصل باشندہ ہے اور 2005ء میں دہلی جرنل میں گورنمنٹ کے بعد اپنے گھرانے کے شناختی کارڈ اور ڈوسیاٹیل کو درجہ 12-05-07 اور 25-9-2007 کو دہلی جرنل کے نام منتقل کر چکے ہیں۔

3- بی بی امیرہ PSI درجہ سید صالح الدین آئی 1992ء کے مطابق (22 سالوں) کے ٹاؤن جرنل کے تحت سکول میں ڈیڑھ انجام دیتی رہی ہے اور عسکریہ کا نمبر 2007ء کے مطابق (15 سالوں) کے ٹاؤن جرنل میں انجام دیتی رہی ہے۔

4- درویشی شہناز بی بی PSI کے مطابق (1992ء) میں دہلی ڈسٹرکٹ میں رہتی تھیں (جو کہ لکھی ہے) جبکہ مسافر کے بارے میں PSI اور 1992ء میں PSI کے سرٹیفکیٹ کے بارے میں

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مفتی - انکوائری بورڈ

یاد است - میں عدہ انکوائری جبرائیل حکیم ڈسٹرکٹ ایجوکیشن آفیسر زمانہ حیدرآل اور در نبر  
61-5258 کے مطابق لیڈی آفیسر PST عابدہ کانے PST اور در خواستی شہناز بی  
PST کے انکوائری کے سلسلے میں دینین کشٹ میں بہروز مجید کو تہ 9 بجے انکوائری  
Conduct کیا ان سے انگ انگ بیان لیا گیا (جو کم کف ہے) اور انکوائری  
Documents کی کاپی کی گئی

1- جس کے مطابق عابدہ کا PST اور لیڈی آفیسر کا PST جو کم کفیل تو انکو کے اصل پاسپورٹ  
جس کے شناختی کارڈ اور دو مسائل حال میں حیدرآل ضلع اباد کے نام بالشریب تہ  
28.8.011 اور 29.8.011 کو بنائے گئے ہیں۔ شناختی کارڈ اور دو مسائل کی کاپیاں برا ملا کر لے گئی ہیں

2- جبکہ در خواستی شہناز بی کے PST جو کم کفیل تو انکو کے اصل پاسپورٹ ہے اور دو مسائل 2005 میں دینین  
میں کو بنانے کے بعد انے کا اندازہ شناختی کارڈ اور دو مسائل کو در 12.8.07 اور 5.9.07  
کو دینین کشٹ حیدرآل کے نام منتقل کر چکے ہیں۔

3- لیڈی آفیسر PST زوبیر سید صلاح الدین اف 1992 سے تاحال (22 سالوں) سے ٹاؤن حیدرآل  
کے مختلف سکولوں میں ڈیوٹی انجام دیتی رہی ہے اور عابدہ کانے کو تہ 2002 سے  
تاحال (12 سالوں) سے اسی حیدرآل میں انجام دیتی رہی ہے۔

4- در خواستی شہناز بی کے PST زوبیر محمد طاہر نے تدریس پاس لیا تھا جس میں لیا (جو کف ہے)  
جس کے عابدہ کانے PST اور لیڈی آفیسر PST کے پاس لیا گیا ہے۔



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Ann: E



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Peshawar, dated the 10th September, 2014

(25)

ATTESTED

*[Signature]*

**NOTIFICATION**

No. SO(PE)4-5/Meeting/2013/Transfer/Posting.  
Consequent to completion of rationalization of the posts / teachers in primary schools and in supersession of previous instructions on the subject;

No transfers and postings (under any nomenclature whatsoever) are allowed hereafter and until further order at primary level;

Violation of these orders will be considered disobedience, misconduct and willful negligence, and the person responsible shall be proceeded against under the Khyber Pakhtunkhwa (Efficiency and Discipline) Rules 2011.

SECRETARY

Endst: of even No & date:

Copy forwarded to:

1. The Registrar, Peshawar High Court, Peshawar.
2. All Directors, E&SE Khyber Pakhtunkhwa, Peshawar.
3. Additional Secretary in E&SE Department, Khyber Pakhtunkhwa, Peshawar.
4. Deputy Secretaries in E&SE Department, Khyber Pakhtunkhwa, Peshawar.
5. The Secretary, Khyber Pakhtunkhwa, Public Service Commission, Peshawar.
6. The Registrar, Khyber Pakhtunkhwa, Service Tribunal, Peshawar.
7. All District Education Officers, Khyber Pakhtunkhwa.
8. All Section Officers in E&SE Department, Khyber Pakhtunkhwa, Peshawar.
9. PSO to Chief Secretary, Khyber Pakhtunkhwa.
10. PS to Secretary, Establishment Department, Khyber Pakhtunkhwa.

*[Signature]*  
(ZAMIN KHAN MOMAND)  
SECTION OFFICER  
(Primary)

*[Handwritten signature]*  
BERAF Porely

Transfer/Posting instruction 2014, E&SED



*[Handwritten signature]*

Amman: E-1

OFFICE OF THE  
DISTRICT EDUCATION OFFICER  
(FEMALE) CHITRAL.

No. 1919-33/  
DATED 27/7/2015.

51

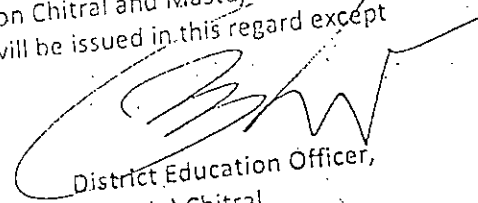
1. Mst. Shahida Akhtar, W/O Abdul Ghani, PSHT GGPS, Kushum (P)
2. Mst. Sajida Bibi W/O Sultan Ahmad, PSHT GGPS Bsirga Bala.
3. Mst. Nasim Bano W/O Mohammad Shah PSHT, GGPS, Sherati.
4. Mst. Naseem Akhtar W/O Akhtar Hussain, PSHT GGPS, Ursoon.
5. Mst. Bibi Saeeda Naz W/O Noor Mohammad, PSHT GGPS, Kushum Bala.
6. Mst. Jabeen W/O Mohammad Ibrahim PSHT GGPS, Shagram.
7. Mst. Bartul Jamal W/O Sher Fakim, PHST GGPS, Saht.
8. Mst. Rukhsana Parveen W/O Rehmat Niaz, PHST GGPS, Balim.
9. Mst. Sarwat Irshad W/O Faiz Ahmad PSHT GGPS, Sheradesh.
10. Mst. Fihat Irshad W/O Muntaz Ali PSHT, GGPS, Tonkuh Terich.
11. Mst. Ehsan Bibi W/O Mohammad Nazem, PSHT, GGPS, Tolami Terich.
12. Mst. Javeed W/O Qazi Ishaq PSHT, GGPS, Washich.
13. Mst. Irshad Parveen W/O Iqbal Shah PSHT, GGPS, Gaht.
14. Mst. Bibi Shahnaz W/O M. Tahiruddin PSHT GGPS, Asper Dömel.

ATTESTED

Subject:-  
Memo:-  
FINAL NOTICE.

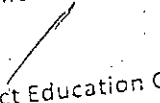
References to the judgment of Honorable Civil Judge-I/ Allaqa Qazi Chitral vide No. 55/1 dated 24.07.2015.

You all are once again finally directed in the light of the above judgment that you should immediately taken over charge at your adjusted stations as a result of your up gradation without fail, positively, otherwise you all will be held responsible for the consequences. Due to your court case and not resumption of charge in time about 1108 students of Sub Division Chitral and Mastuj are already suffered from their basic right of education. No further reminders will be issued in this regard except serving of Show Cause / Charge Sheet under the rules.

  
District Education Officer,  
(Female) Chitral.

Endst: No \_\_\_\_\_ / EB (F) Dated Chitral, the \_\_\_\_\_ / 2015.

- Copy of the above is forwarded to the:-
1. The Director of Education (E & S) Khyber Pakhtunkhwa, Peshawar for information, please.
  2. SDEO (F) Chitral.
  3. SDEO (F) Mastuj at Booni.

  
District Education Officer,  
(Female) Chitral.

بخدمت جناب ڈائریکٹر صاحب ایلمنٹری اینڈ سیکنڈری ایجوکیشن خیبر پختونخوا

مخانب: متاثرہ خواتین اساتذہ ایڈجسٹمنٹ آرڈر نمبر 88-8308 مورخہ 22/11/2014 ڈی ای او (فیمیل) چترال

عرض داشت: درخواست برائے منسوخ مذکورہ بالا آرڈر

ATTESTED

جناب عالی!

موردبانہ گزارش ہے کہ 17 دسمبر 2012 کو استانیوں کی ترقی کا حکم آیا ضلع چترال میں بھی دوسرے اضلاع کی طرح DEO (میل) نے ترقی کے ساتھ ایڈجسٹمنٹ بھی کردی۔ مگر DEO (فیمیل) زہرہ جلال نے بدانتظامی اور اقرار پروری کی بنیاد پر استانیوں کی ایڈجسٹمنٹ دوسالوں کے لئے روک دی۔

جناب والا! صوبائی حکومت کے طریقہ کار اور قانون کے مطابق ترقی پانے والوں میں سنیر استانی کو ان کے ہوم سٹیشن میں رکھا جانا چاہئے اور جو سنیر کو حسب ضرورت یوسی کے اندر یا قریبی یوسی میں تبدیل کیا جانا چاہئے۔ DEO (فیمیل) چترال نے قانون کی خلاف ورزی کرتے ہوئے 172 استانیوں کو ان کے من پسند سٹیشنوں میں استحقاق اور میرٹ کے بغیر رکھا ہوا ہے۔

جناب والا! محکمہ تعلیم کی پالیسی کے مطابق PST استانیوں کو ان کی اپنی UC کے اندر تبدیل کیا جائے گا۔ اگر UC کے اندر جگہ خالی نہ ہو تو قریبی UC میں پوسٹنگ اور ایڈجسٹمنٹ ہوگی۔ DEO (فیمیل) نے اس پالیسی کی خلاف ورزی کرتے ہوئے ساکلاں کو ترقی کے دو سال بعد ہوم سٹیشن سے 80/100/140/200 کلومیٹر دور ایڈجسٹ کر دیا ہے۔ اگر 2012 میں 117 استانیوں کو DEO (میل) کے طرز پر 173 سکولوں کے اندر بروقت ایڈجسٹ کیا جاتا تو کوئی مسئلہ نہ ہوتا۔ مگر DEO (فیمیل) نے بدانتظامی اور بددیانتی کی وجہ سے ترقی کیساتھ تبدیلی کے حکم کو 2 سالوں کے لئے دبائے رکھا اور اپنے من پسند استانیوں کو ناجائز فائدہ پہنچایا۔

اس لئے التماس ہے کہ جناب والا! براہ کرم مذکورہ بالا غیر قانونی ٹرانسفر اور رٹنیشن کو منسوخ کر کے دسمبر 2012ء کی پوزیشن میں دوبارہ ایڈجسٹمنٹ آرڈر جاری کئے جائیں۔

تاکہ حقدار کو اس کا جائز حق مل سکے۔ اور خواتین اساتذہ مطمئن ہو کر اپنی تعلیمی سرگرمیاں جاری رکھ سکیں۔

عین نوازش ہوگی۔

فقط: عرضے فدیوں

نمبر شمار	نام اساتذہ	سکول	دستخط
-1	شہابہ اختر	G.G.P.S. Bakerabad	S. Far
-2	سہیل اختر	G.G.P.S. Jimirat	N. Far
-3	سیدہ الحسن	G.G.P.S. Guldeev	B. Far
-4	نورجوانہ	G.G.P.S. Balach	F. Far
-5	بی بی شہناز	G.G.P. Bakerabad	S.H. Far
-6	بی بی سعیدہ ناز	G.G.P.S. Kaxi	S.M. Far
-7	نور شہد مجاہد	گورنمنٹ پرائمری سکول	H. Far
-8	حسین	G.G.P.S. Guldeev	F. Far

Ann: 6

S3 / 61

BEFORE THE PESHAWAR HIGH COURT MINGORA BENCH /  
DARUL QAZA

ATTESTED

*[Signature]*

W.P No..... of 2015

1. Shahida Akhtar W/O Abdul Ghani
2. Nasim Akhtar W/O Akhtar Hussain
3. Bibi Saeeda Naaz W/O Noor Khan
4. Jabin W/O Muhammad Ibrahim Khan
5. Bait ul Jamal W/O Sher Hakim
6. Sarwat Fayaz W/O Fayaz Ahmad
7. Bibi Shehnaz W/O Muhammad Tahir ud Din
8. Farhat Irshad W/O Mumtaz Ali
9. Irshad Parvin W/O Iqbal Shah
10. Khursheed Bibi W/O Muhammad Naeem

Primary School Head Teachers, Department of Education Elementary and  
Secondary Education District Chitral.

.....Petitioners

VERSUS

1. Government of KPK through Secretary Elementary and Secondary  
Education KPK, Peshawar.
2. Director Elementary and Secondary Education KPK Peshawar.
3. District Education Officer (Female) District Chitral.
4. Sub divisional District Education Officer Chitral.
5. Sub divisional District Education Officer Mastooj at Booni.

.....Respondents

WRIT PETITION UNDER ARTICLE 199 OF THE CONSTITUTION OF THE ISLAMIC  
REPUBLIC OF PAKISTAN, 1973.

The factual and legal grounds giving raise to this Constitutional Petition are  
respectfully submitted as under.

1. That the petitioner were initially appointed as Primary School Teachers  
(Female) in school of their respective union councils as per rules and policy  
of the government.

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2. That vide order bearing No.21023-27/F No dated Chitral the 26.12.2012. The petitioners along with other teachers were promoted/ upgraded to the post of Primary School Head Teachers in BPS-15. Copy of order is annexure A.
3. That under section 3 of Khyber Pakhtunkhwa (Appointment, deputation, posting and transfer of teachers, lecturers, instructors and doctors) Regulatory Act, 2011, hereinafter called as Act of 2011, the Primary School Teachers are required to be posted in a school situated within the limits of union council to which the teachers belong. Copy of Act is annexure B.
4. That to meet the requirement of the Act of 2011, the policy of Rationalization was introduced by the Government vide which one primary teacher was to be provided for each 40 students on the roll mentioned as 1-40 ratio. The policy dated 02.01.2013 is annexure C.
5. That under the Act of 2011 and the policy adopted for promulgated by the Provincial Government, the posting of the promoted teachers including the petitioners was required to be made after adopting, completing and preparing rationalization, more particularly after observing the seniority of the promoted teachers as provided under the law.
6. That Respondent No.3, District Education Officer (Female) District Chitral failed to complete the rationalization in time and although an attempt has been shown to have been made at a very belated stage is incomplete on one hand and ineffective and inadequate on the other hand, which has resulted in grave violation of the fundamental, constitutional and legal rights of the petitioners.
7. That having thus failed to complete rationalization, the Respondent No.3 also faced a complaint on the subject leading to a notification dated 10.09.2014. Proceedings of enquiry in complaint and notification are annexure D-1 to D-5.
8. That Respondent No.3 instead of following the law and policy and taking timely action with regard to rationalization, issued different posting transfer orders with regard to petitioners and others on different dates ie dated 26.07.2014 annexure E & F, dated 21.08.2014 annexure G, dated 22.11.2014 annexure H followed by show cause which is annexure H-1 to H-3.
9. That the above mentioned posting orders which were issued without following rationalization policy and seniority led to numerous difficulties and confusions for the petitioners inter alia they were posted out of their union councils and remote and hard areas and also the delay caused in the rationalization deprived the petitioners or any other willing teacher to forgo

**ATTESTED**  
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their promotion as provided under the law in reasonable and genuine situation like inability to serve in the remote area.

10. That the act of Respondents is based on malafide, without lawful authority, discriminatory and violative to the law and natural justice.

11. That having no other adequate and alternate remedy and in the background of what has been mentioned above, the petitioners are constrained to approach this Honorable Court for the indulgence of its Writ Jurisdiction

**RELIEF:**

By accepting this petition, an appropriate Writ may graciously issued directing;

i. Respondent No.3 to complete and carry out rationalization of Primary School Teachers from the period 2012 onwards in accordance with the given formula in the Rationalization Policy.

ii. To remove the anomaly and contradictions of the posting/ transfer orders issued without observing rationalization policy and seniority.

iii. To refrain from taking any further action against the petitioners.

iv. Any other relief this Honorable Court may deem just and proper.

**INTERIM RELIEF.**

In the meanwhile, no adverse action may graciously be taken against the petitioners till the disposal of the instant Writ Petition.

Petitioners

Through

Dated.04.11.2015

Amir Gulab Khan &

Fayaz Muhammad Qazi

Advocates.

**ATTESTED**

55

Ann: H

BEFORE THE PESHAWAR HIGH COURT MINGORA BENCH /  
DARUL QAZA

56

W.P No. 544-11 of 2015

1. Shahida Akhtar W/O Abdul Ghani
2. Nasim Akhtar W/O Akhtar Hussain
3. Bibi Saeeda Naaz W/O Noor Khan
4. Jabin W/O Muhammad Ibrahim Khan
5. Bait ul Jamal W/O Sher Hakim
6. Sarwat Fayaz W/O Fayaz Ahmad
7. Bibi Shehnaz W/O Muhammad Tahir ud Din
8. Farhat Irshad W/O Mumtaz Ali
9. Irshad Parvin W/O Iqbal Shah
10. Khursheed Bibi W/O Muhammad Naeem

Primary School Head Teachers, Department of Education Elementary and  
Secondary Education District Chitral.

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(Female) in school of their respective union councils as per rules and policy  
of the government.

FILED TODAY  
05 NOV 2015  
District Registrar

57

JUDGMENT SHEET  
IN THE PESHAWAR HIGH COURT,  
MINGORA BENCH (DAR-UL-QAZA), SWAT  
(Judicial Department)

W.P. No. 544-M of 2015.


*Mst. Shahida Akhtar & 9 others*  
VS  
*Govt: of Khyber Pakhtunkhwa & others*

JUDGMENT

Date of hearing: 16.5.2016.

Petitioners:- (Mst. Shahida Akhtar & others) by  
Mr. Amir Gulab Khan, Advocate.

Respondents: (Govt: of K.P.K & others) by Mr.  
Sabir Shah, A.A.G.



MUHAMMAD YOUNIS THAHEEM, J.- Through the instant writ petition under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973, Mst. Shahida Akhtar & 9 others, the petitioners have made a prayer that the respondent No. 3 be directed to complete/carry-out regularization of primary school teachers from the period 2012 onward in accordance with the given formula as per rationalization policy.

2. Brief facts of the case are that petitioners were initially appointed as Primary School Teachers (female) in schools of their respective union councils, as per rules and policy of the government. Thereafter, vide office order

Nawab

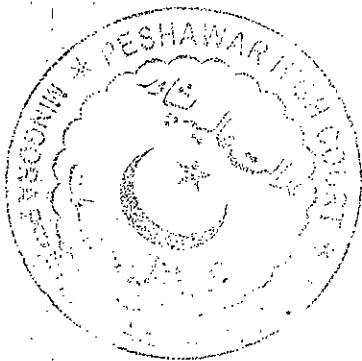


No.21023-27/F Chitral dated 26.12.2012, the present petitioners were promoted/upgraded to the post of Primary School Head Teachers (BPS-15), however, after up-gradation/promotion their postings were made by the respondents to the schools where such posts of their cadre grade were available or vacant and were not posted in the schools where they were already working in their previous grade, where no such post either existed or was one that also filled, so, feeling aggrieved from such postings orders of the respondents, the petitioners approached this Court through instant constitutional writ petition.



3. Comments were called from the respondent No. 3, who submitted his comments, wherein he raised several objections both legal and factual. On legal side, the respondent No. 3 raised preliminary objection that the matter under *lis* pertains to terms and conditions of civil servants, as admittedly the petitioners are government employees, so, in view of barring clause of Article 212 of the Constitution of Islamic Republic of Pakistan, this Court lacks jurisdiction, while on factual side, the answering respondent submitted

that the petitioners being civil servants are legally bound to serve where they are transferred/posted as per government policy. Moreso, in the order of up-gradation there is no mention of the fact that after fetching promotion to the next higher grade they will not be transferred from the schools where they were already working, whereas under the rules being civil servants they can be transferred to anywhere under the rules. In this respect Para No.11 of the comments is reproduced as under:-



*"11. Denied, the petitioners conceal material facts from this honouable Court which are sin-qua-non for the just & fair disposal of the case. It is pertinent to mention here that the petitioners were up graded to the next higher scale/grade under certain terms and conditions, wherein it was not specifically mentioned anywhere that after getting promotion/up gradation they will be sticked at the stations of their own choice, but it is surprising to note that on one hand they avail the benefit of up gradation while on the other hand they make departure from the same by invoking the constitutional jurisdiction of this honourable Court. It is clarified that neither the petitioners assume their charges after up gradation nor they perform duty*

Nawab

*Signature*  
 15/05/11

*even for a single day which amounts misconduct, therefore, the competent authority initiated disciplinary proceedings against them, because at about 1108 national kids are suffering due to their Lukewarm and indifferent attitude. It is, therefore, prayed that on acceptance of the above humble submissions the instant writ petition may graciously be dismissed in favour of the answering respondent with heavy cost and also directed the petitioners to obey the order of the competent authority issued with bona fide intention and within the interest of public at large and also to save the public valuable/precious time of the national kids."*



4. Arguments of learned counsel for the parties heard and available record perused with their able assistance.
5. Perusal of the record would reveal that the petitioners were up graded to the next higher grade .i.e. BPS-15 and their postings were made in the schools where the posts of same grade were available or vacant. As per government policy and rules only those civil servants/teachers, who had forgiven their promotion/up-gradation, they were allowed to work in the schools of their respective

Nawab

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union councils. Moreover, it is impossible that all the teachers including the petitioners after their promotion/up gradation be posted at their own union councils, therefore, where the posts of their cadre were available or vacant their postings were made outside of their respective union councils, however, being females, it is also the responsibility of government that as per rules and policy, the petitioners be appointed/posted in their respective Union Councils or near to their own union councils due to law & order situation and other relevant rules in this behalf for their convenience.



6. The learned counsel for the petitioners failed to point-out any miscarriage of justice caused to the petitioners. Besides the above, admittedly, the petitioners are civil servants and the matter of their posting/transfer/promotion relate to their terms and conditions of service, for which the competent forum is the Khyber Pakhtunkhwa Service Tribunal constituted under Service Tribunals Act, 1973 as the jurisdiction of all other Courts including the High Court was specifically ousted because of the provisions contained in Article 212 of the Constitution. In this respect reliance is placed on the recent judgment of Hon'ble Supreme

*[Handwritten signature]*

Court of Pakistan in case titled as "Province of Sindh etc vs Farooq Azam Memon and others (C.R.P. No. 199/2013 in Constitutional Petition No. 71/2011 alongwith 50 others CPRs), reported as "2015 SCMR 456" "Ali Azhar Khan Baloch and others vs. Province of Sindh and others", wherein it has been held by their Lordships with regard to particular principle of law as below:

*"the law also needs to be looked afresh, because writ jurisdiction in the matter relating to terms and conditions of service against the executive by the aggrieved Civil Servant is barred under Article 212 of the Constitution."*

7. In view of what has been discussed above, the instant petition being bereft of merits stands dismissed.

Announced  
Dt: 16.5.2016

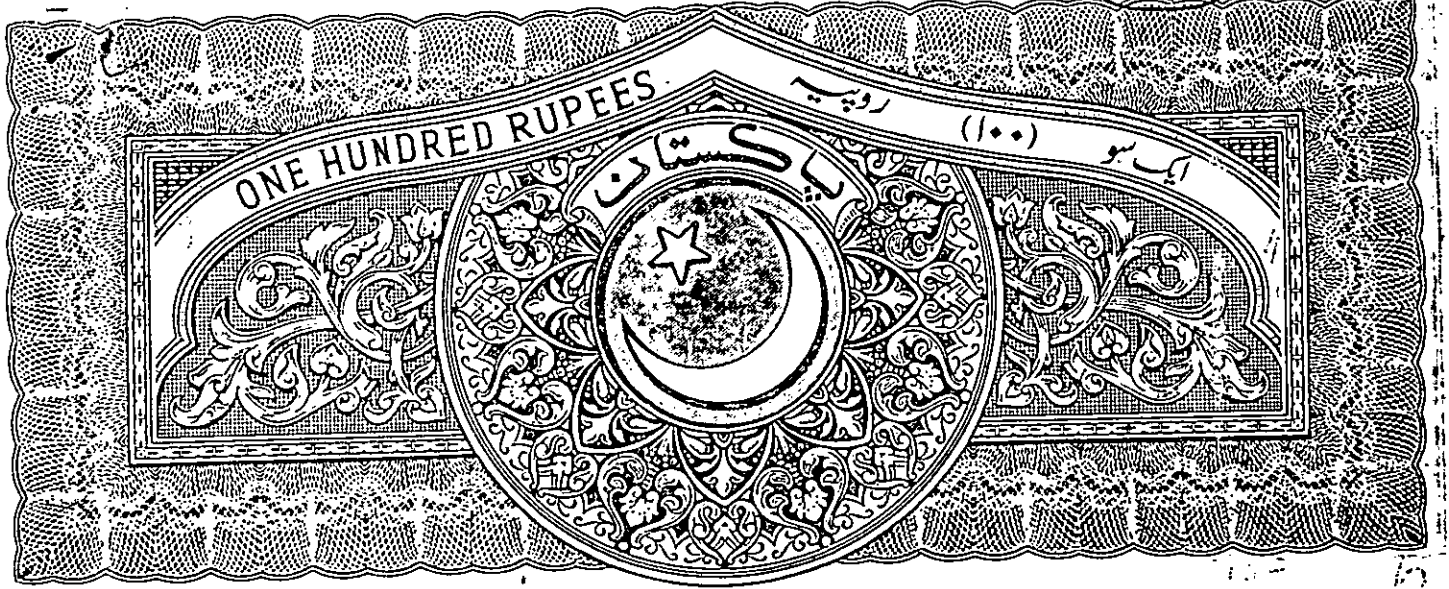
Sd/- Justice Khalid Iqbal  
Sd/- Muhammad Younis Thaneem-J

Certified to be true copy

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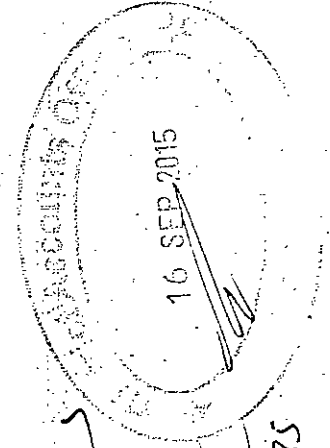




### مختار نامہ خاص

مایا ننگہ (۱) شاہدہ اختر زوجہ عبدالغنی (۲) ساجدہ بی بی زوجہ سلطان احمد (۳) نسیم اختر زوجہ اختر حسین (۴) بی بی سعیدہ ناز زوجہ نور خان (۵) جمین زوجہ محمد ابراہیم خان (۶) بہت الجمالی زوجہ شیر حکیم (۷) ثروت ارشاد زوجہ فیاض احمد (۸) بی بی شہناز زوجہ محمد طاہر الدین (۹) فرحت ارشاد زوجہ ممتاز علی (۱۰) ارشاد پروین زوجہ اقبال شاہ (۱۱) خورشید بی بی زوجہ محمد نعیم PHSTS محکمہ تعلیم ضلع چترال اس وقت پتہ نئی ہوش دھواس اس تحریر کی رو سے اقرار کر کے لکھ دیتی ہیں کہ ایک گرامی / ایٹل بعنوان شاہدہ وغیرہ بنام DEO تحصیل وغیرہ عدالت عالیہ پشاور ہائی کورٹ میں دائر کر کے چاہتے ہیں۔

مختار نامہ خاص میں جو عورت ذات اور عدیم الفرصت مقدمہ مذکورہ کی بیروی اصلات کرنے سے معذور ہیں۔  
 بنا برائے ~~پشاور ہائی کورٹ~~ ڈیو لڈ معراج الدین، حامل قومی شناختی کارڈ نمبر 5-3563033-15201 ساکن جو تحصیل و ضلع چترال کو اپنا مختار خاص مقرر کر کے اختیار دیتے ہیں کہ وہ ہماری جانب سے وکیل یا بیرٹر مقرر کرے۔ کوئی بیان دیوے۔ جواب دعویٰ و اقبال جواب داخل کرے۔ اقبال دعویٰ کی بابت بیان دیوے، بیان حلفی دیوے۔ گواہ طلب کرے گواہ پیش کرے۔ راضی نامہ، وکیل، طالبہ، استیع مقرر کرے یا عہدہ کرے، بصورت ڈگری اجراء کرنے یا بنا راضی نامہ، فیصلہ عدالت مجاز میں اپنی، اگر انی مدد داری یا تجویز حلفی کی استدعا کرے۔ کوئی ذر لائق کی ادائیگی یا وصولی کرے۔ ضمانت داخل کرے یا واپس لے لے۔ بصورت اخراج مقدمہ



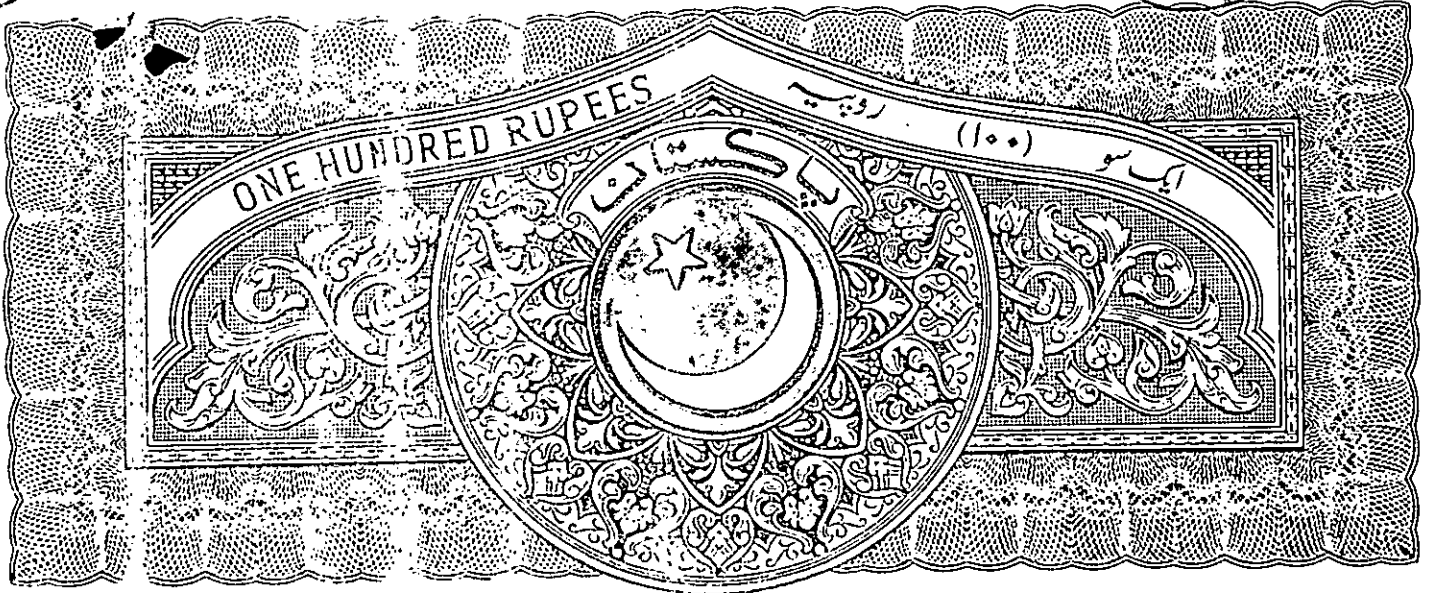
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2015

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*Johnnie Lee*  
*in the presence of*  
*Clara J. M. 262*  
*Ms. J. M. 262*

Stefanie Reisman  
Sender & Petitioner Visitor  
3000 ...



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درخواست برآمدگی کرے یا بصورت کروائی یکطرفہ درخواست منسوخ کرے۔ الفرائض بیرونی مقدمہ کے سلسلے میں جو اختیارات من مقرران کو حاصل ہیں وہ مختار خاص کو تفویض کرتے ہیں۔ مختار ہر سو ف کا یہ ماسختہ پرداختہ بنا چوں و چرا عمل کرے وہ ذات خاص من مقرران کو قبول و منظور ہو گئے۔

لہذا مختار نامہ لکھدی تاکہ سند رہے۔  
المرقومہ مورخہ 18 اکتوبر 2015

العبد S. A. S. العبد سید العبد سید  
(1) شاہد اختر (2) ساجدہ بی بی (3) نسیم اختر (4) بی بی سعیدہ نماز

العبد سید العبد سید العبد سید العبد سید  
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العبد فرحت ارشد العبد فرحت ارشد العبد فرحت ارشد  
(9) فرحت ارشد (10) ارشاد پروین (11) خورشید بی بی

فقار نامہ بحق منظور ہے۔

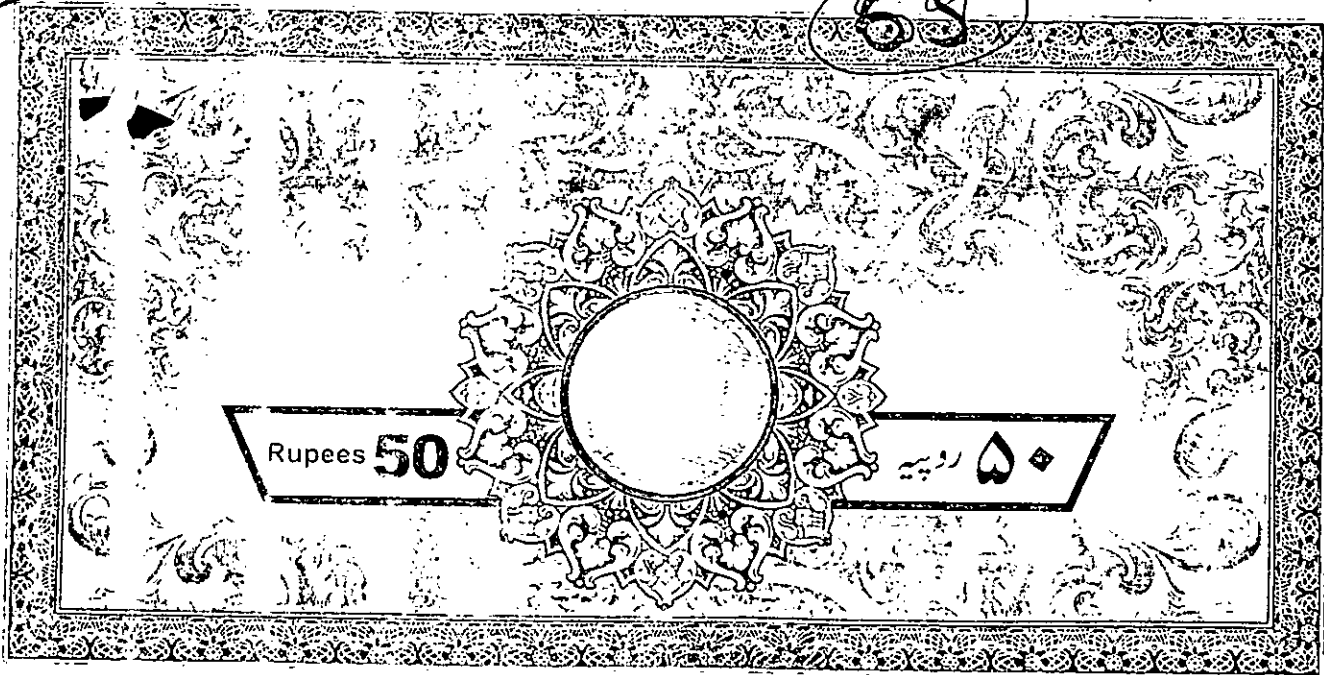
العبد اسرار الدین  
اسرار الدین

گواہ شد رضی الدین گواہ شد علی العفی





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ATTACHED

بعدالت

سروس ٹریبونل ضلعہ ننواہ شاور

وائسٹ 2016ء پنجاب ایڈوانس  
بی بی سعیدہ نانینام حکومت و غیبہ

سروس اپیل

موزخہ  
مقدمہ  
دعویٰ  
جرم

باعث تحریر آنکھ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کارروائی متعلقہ  
آن مقام شاور کیلئے امیر گلاب خان ہجرہ اعظمہ استغاف خان کو اپنا وکیل

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار دیا۔ نیز  
وکیل صاحب کو راضی نامہ کرنے و تقریر ثالثہ فیصلہ برحلف دینے جواب دہی اور اقبال دعویٰ اور  
بصورت ڈگری کرنے اجراء اور صولی چیک و زود پیدار عرضی دعویٰ اور درخواست ہر قسم کی تصدیق  
زرا میں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی  
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور  
کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقریر کا اختیار  
ہوگا۔ اور صاحب مقرر شدہ کو کبھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ  
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے دہوگا۔  
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی  
مذکور کریں۔ لہذا ادکالت نامہ لکھ دیا کہ سند ہے۔

المرقوم 3 ماہ اگست 2016

واہ

Attested accepted  
P.A.C.

Attested & accepted  
Mh

بمقام  
شاور  
Attested & Accepted  
Fazl