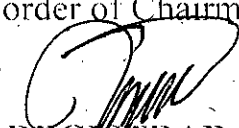


FORM OF ORDER SHEET

Court of _____

Appeal No. 472/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	01/04/2024	<p>The appeal of Miss. Lubna Baseer resubmitted today by Mr. Rahim Khan Advocate. It is fixed for preliminary hearing before touring Single Bench at Swat on 10.05.2024. Parcha Peshi given to the counsel for the appellant.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal of Miss. Lubna Baseer received today i.e on 28 .03.2024, is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- According to sub-rule-4 of rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974 respondent no. 3 un-necessary/improper party, in light of the rules ibid and on the written direction of the Worthy Chairman the above mentioned respondent number be deleted/struck out from the list of respondent.
- 2- Annexure-C of the appeal are illegible be replaced by legible/better one.

No. 704 /S.T.

Dt. 28/3 /2024.


28/3/24

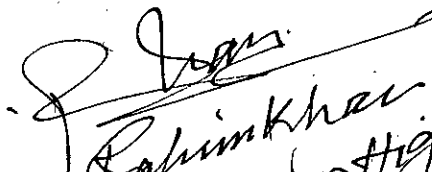
REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Rahim Khan Buner Adv.
High Court Buner.

Re submitted with the request that new legible copy of Annexure "C" as desired is attached. Also Respondent NO. 3 ~~Secretary Edu: KP~~ deleted from the Penal of Dependents, as desired.

Hence the Case is Re-Submitted after doing the needful, may be entertained.

The Registrar
Service Tribunal
K.P. Peshawar.
Mense


Rahim Khan
Adv. High Court
Counsel for the Appellant
Dt, 01-04-2024

IN THE KHYBER PUKHTOON KHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 472 /2024

Miss, LUBNA BASEER PET Versus D.E.O (F) Buner & others.

INDEX

S.No	Description of contents	Annexure	Pages
1	Memo of service appeal		01-08
2	Affidavit		00-09
3	Addresses of parties		00-10
4	Copy of regularization order as PET B 15 appointment vide order End; No.5621-29 dated 6/3/2018(regarding the appointment of the appellant made vide order No.9443-48 dated 16/5/2014.)	"A"	11-12
5	Copies, of application of the appellant, dated 21/5/2018 for transfer and the earlier transfer order of the appellant dated,18/10/2018, are annexed as "B".	"B" "B-1" -2	13-14
6	Copy of transfer order No.2180-85 dated 08/07/2023 from GGHS sura to GGMS Channar	"C"	00-15
7	<u>Copy of application and assurance & endorsement of respondent No.1 on 22/07/2023</u>	"D"	00-16
8	1. Copy of the order IMPUGNED End; No.4547-53 dated 14/12/2023 , passed by the respondent No.1, 2. Staff/Budget Position Of GGHS Sura, showing the post PET B15, 3. Service certificate of spouse/husband of the appellant in GHSS Nawagai U/C.	"E" "E-1" "E-2"	00-17 00-18 00-19
9	Copy of Departmental appeal dated 16/12/023 vide Diary No.324 dated 21/12/2023.	"F"	00-20
10	Wakalath Nama		00-21

Through counsel

APPELLANT

Rahim Khan

Adv High Court

Office ; at Distt; Courts Daggar Buner

Cell= 03439049185

Dated 15/03/202

(1)

IN THE KHYBER PUKHTOON KHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 472/2024

Miss, LUBNA BASEER PET B-15 W/O Ghafoor Gul, Govt; Girls Middle School Channar District Buner.

“Appellant “

Versus

1. District Education Officer (F) E & S Education Buner.
2. Director E & S Education Department Peshawar .
3. Miss, Zeenath Begum PET BPS 15 GGHS Shadam /now GGHS Sura Tehsil Mandanr District Buner.

“Respondents”

SERVICE APPEAL UNDER SECTION 4 OF THE K.P SERVICE TRIBUNAL ACT 1974 , AGAINST THE OFFICE ORDER, IMPUGNED End; No.4547-53 dated 14/12/2023, WHEREBY THE RESPONDENT No.1, HAS WRONGLY , FRUADULENTLY AND TACTFULLY, PLACED THE PRIVAT RESPONDENT No.3, WHO IS BLUE EYED OF THE RESPONDENT No.1, AND ALSO SEEMS RESULT OF SUSPECTED GIVE AND TAKE, AS THE APPELLANT ACTUALLY WAS ENTITLED AND DESERVING TO EITHER NOT BE TRANSFERRED PREVIOUSLY OR THAN RE TARNSEFERED BY WAY of RE POSTING ON THE SAME POST, BECAUSE, THE RESPONDENT NO.1 WAS BINDING AS PER PRE ASSURANCE, MADE HERSELF ON THE APPLICATION OF THE APPELLANT ON DATED, 22/7/2023 while THE APPELLANT WAS TRANSFERRED TO GGMS CHANNAR VIDE ORDER No.2180-85 dated 08/07/2023, ON THE PRETAX THAT THE APPELANT IS PET B15 AND THE POST HAS UPGRADED TO SPET B16 AND THAT TIME THE RESPONDENT No.1, AN OTHER HER BLUE EYED HAD PALCED BY ADJUSTMENT OF HER CHOICE LIKE THIS. HENCE THE ORDER IMPUGNED IS ENEF FECTIVE ON THE RIGHTS OF THE APPELLANT AND NOT SUSTAINABLE IN THE EYES OF LAW, BUT IS LIABLE TO BE SET ASIDE IN FAVOUR OF THE APPELLANT BY ADJUSTING HER ON.

Pray in Appeal

Pray in Appeal

On acceptance of the instant Service appeal of the appellant, the order **IMPUGNED End; No.4547-53 dated 14/12/2023**, passed by the respondent No.1, just to accommodate the private respondent No.3, being her blue eyed, on the seat of her choice by clear discrimination, against the vacant post of PET B 15, in GGHS Sura, fraudulently and tactfully, against which the appellant has superior right to be posted, whom spouse has been serving, in GHSS Nawagai as Senior Drawing Master B 16 and as per pre assurance and clear acknowledgment and declaration of due right of the appellant, made by the respondent NO.1, may be set aside in favour of the appellant by Re transferring and re posting of the appellant on the same seat of PET B15 in the GGHS Sura.

further relief to which the appellant is otherwise entitle, under the law , though not specifically prayed for, in the instant service appeal, may also be granted.

Respectfully sheweth.

Facts

1. That the appellant was appointment as PET B 15 vide order No.9443-48 dated 16/5/2014. Subsequently she was regularized as PET B 15, vide order End; No.5621-29 dated 6/3/2018. Copies are annexed as "A".
2. That the appellant after performing her duty, since 1st appointment dated 16/5/2014 up to 18/10/2018, in GGH School Sowawai, Tehsile Khadokhail Distt; Buner, she had submitted an application for transfer on 21/05/2018, with specification of two vacant posts, each, one PET B15 in GGMS Khanano Dehrai and one PET B 15, in GGMS Tenawlo Dehrai to the respondent No.1, on the bases of spouse policy , but the respondent No.1, by ignoring the aforementioned specified stations, had transferred the appellant , to GGHS Sura vide order No.1034-29 dated 18/10/2018 . Copies, both, of application dated 21/5/2018 and of the order dated,18/10/2018, are annexed as "B".

3. That then the respondent No.1, on mala fide intention, just to accommodate one of her blue eyed, SPET B16, Miss Ishrath Baigam, the appellant was transferred from GGHS sura vide order No.2180-85 dated 08/07/2023 to GGMS Channar, on the pretext by fraud, tactfully and wrongly by showing to the appellant that the post of the appellant has been upgraded to Senior PET (SPET) B 16. Therefore the appellant could not remain more at the same station, because she was/is PET B 15. And thus the appellant complied with the same order, considering as genuine. Copy of the said order is also annexed as "C".
4. That the appellant aggrieved from that order, had ^{also} filed an application to the respondent NO.1, who had endorsed the same application on 22/07/2023 and the appellant was assured that whenever any vacancy of PET B15 made available there, the appellant will be adjusted on. Copy of the said application with endorsement/assurance of the respondent No.1, is annexed as "D".
5. That the respondent No1, contrary to her due assurance, already made in favour of the appellant, according to which the appellant was on waiting list, while the original assurance and application was kept by the respondent No.1, on her office record, for keeping the appellant satisfied, which was binding on her, being declared the due right of the appellant, by acknowledging her and under the spouse policy as well, has wrongly passed the order impugned End; No.4547-53 dated,14/12/2023. By virtue of which the Private respondent No.3, who is a PET B15, has been transferred against the same PET B 15 post, to the School of GGHS Sura, (from GGHS Shadam) by showing vacant the same post of PET 15, to which according to the aforesaid assurance, of the respondent No.1, the appellant was entitled and deserving on top priority, to be posted. Copy of the impugned order, copy ^{of} staff position in GGHS Sura and copy of Service certificate of spouse/husband ^{of} of the appellant in GHSS Nawagai U/C, all are annexed as "E", "E-1" & "E-2".

6. That at the time of transfer form GGHS Sura, the respondent No.1 , has tactfully justified the order of the appellant that the said post of PET B 15 had been upgraded to SPET B16, while the SPET B 16, that time adjusted on the said post, was then reposted in her village cheena against the post of IPE B 17, by way of un due favouring her perhaps too, for some illegal gaining , However, the appellant aggrieved from the later order impugned, End; No.4547-53 on 14/12/2023, has filed departmental appeal on dated 16/12/2023, handed over through proper channel vide diary No.324 dated 21/12/2023 . Copy annexed as "F".

Person, 8/2

7. That the respondents, neither No.1 nor 2 or else one, has so far, after lapse of 90 days, statutory period, responded the same so far, hence the appellant having no alternative efficacious adequate remedy, except, to file the instant service appeal, on the following grounds, amongst other inter alia.

GROUNDS

a. That the entire action and inaction of respondent No.1, in the matter of posting and transfer of the appellant, since the transfer order of the appellant, was made, vide order End; No.1034-29 dated 18/10/2018 from GGHS sowawai to GGHS Sura, on spouse Policy, remained colorable, mala fide and discriminatory, fraudulent and tactful up till now, because if the post of PET B15 was not available in GGHS Sura, why the appellant had not posted earlier, against the clear vacant post of PET B 15 , in GGMS Khanano Dehrai or GGMS Tenawlo Dehrai, already requested for in her application dated 21/05/2018. Copy where of ^{has} already annexed as "B".

has
PZ

b. That the impugned role of the respondent No.1, played, in the posting and transfer case of the appellant is a bad and wrong sort of use of her discretion, which is based on

clear mala fide, false and in violation of the legal framework, proposed and recommended for rational exercising of discretionary powers and mandate of law. The role played by the respondent No.1, since and during the transfer of the appellant made even, from GGHS Sura to GGMS chanar, by telling and assuring the appellant for satisfying her that the post of the appellant, here, in sura was/is of SPET B16 and assured for retransferring /reposting here, subject to the same post in the same station or in other nearest station, of PET B15, become available, was basing on cheating, tact and fraud, making that order also void and non existing in the eyes of law including the order impugned and also no time limitation would run, against such like orders, being based on clear fraud. Because when the post ^{OF} PET B15 either earlier was upgraded to SPET B16 or was not existed in GGHS Sura, why the appellant was transferred and posted on the same station previously and why the appellant was not either posted against vacant post of PET B15 in GGMS Khanano Dehrai or GGMS Tenawlo Dehrai, being clearly lying vacant that time, and then why the respondent No.1, has passed the instant order impugned, of the private respondent No.3, who is PET B 15, to GGHS Sura. If question of clear un^r due favour and discrimination with the private respondent No.3 and also mala fide intention with the appellant was not involved, the respondent No.1, would as per she assured already for, made order of the appellant, back transferring and posting her, after the post of PET B 15 was become available in GGHS Sura, rather the private respondent No.3, by issuing her transfer impugned dated 14/12/2023, in un^r due favour, for accommodating her, being her blue eyed, on the same station/GGHS Sura. Hence the order impugned is not sustainable under the law but is liable to be set aside in favour of the appellant on the same grounds.

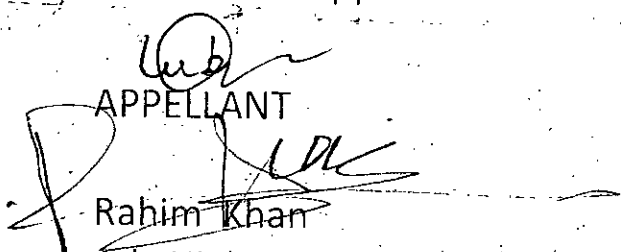
c. That as per written commitment and assurance of the respondent No.1, which is a clear declaration that the

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appellant is entitled to be retransferred and reposted against the vacant post of PET B15, in GGHS Sura, because she was transferred for the alleged reason that the post of PET B 15 was Upgraded as SPET B 16. Hence the order impugned dated 14/12/2023, passed by the respondent No.1, is wrong and against the declared right of the appellant, already admitted by the respondent No.1. Hence has nullity in the eyes of law, being wrong and ineffective on the rights of the appellant and liable to be set aside in favour of appellant.

- d. That the instant appeal is within time and also this Hon; Service Tribunal has jurisdiction to entertain the same.
- e. That further supporting legal and factual points, supporting the instant appeal of the appellant, would be advanced at the time of arguments with due permission of this Hon; Tribunal.

Therefore it is most humbly submitted that on acceptance of the instant service appeal of the appellant, as per prayed in the prayer column on the subject of this appeal, the order impugned **IMPUGNED** End; No.4547-53 dated 14/12/2023, passed by the respondent No.1, in ~~un~~ due favour of the private respondent No.3, may be set aside and the respondent No.1 may be directed to transfer back the appellant and posted against the post of PET B 15 in GGHS Sura. Further relief to which the appellant is otherwise entitle under the law, may also be granted though not specifically prayed for in the instant appeal.

Through counsel

 APPELLANT
 Rahim Khan
 Adv High Court

Office ; at Dist; Courts Daggar Buner
 Cell= 03439049185
 Dated 25/03/2024.

Certificate

2

It is to certify that the entire contents of this service appeal are true and correct and nothing has been concealed from this Hon; Tribunal and that no such like service appeal has earlier been filed before this Hon; service Tribunal or before any competent forum or has been earlier decided by any forum or this Hon; Tribunal.



APPELLANT

CNIC-15101-9629123-0

9

IN THE KHYBER PUKHTOON KHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. _____/2024

Miss, LUBNA BASEER PET Versus D.E.O (F) Buner & others.

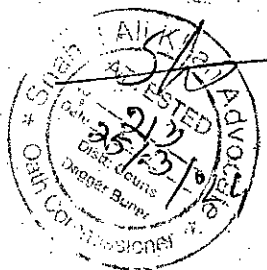
Address Of Parties

AFFIDAVIT

I, LUBNA BASEER W/O Ghafoor Gul , PET B 15 GGMS Channar, Buner /appellant , do hereby affirm and declare on oath that the entire contents of this service appeal are true and correct and that no such like service appeal has been filed earlier in this Hon; Service Tribunal or before any other competent forum or ever has been decided by any forum or court earlier.


Deponent

Miss, Lubna Baseer W/o Ghafoor Gul
PET B 15 GGMS Channar Buner /Appellant
CNIC No.15101-9629123-0
Dated 25/03/2024.



P-10

10

IN THE KHYBER PUKHTOON KHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. _____/2024

Miss, LUBNA BASEER PET Versus D.E.O (F) Buner & others.

Address Of Parties

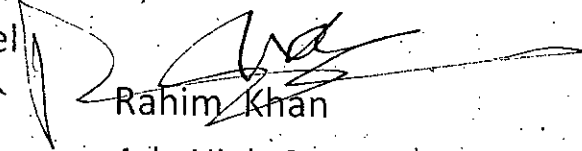
Miss, LUBNA PET B-15 W/O Ghafoor Gul, Govt; Girls Middle School
Channar District Buner. "Appellant "

1. District Education Officer (F) E & S Education Buner.
2. Director E & S Education Department Peshawar .
3. Secretary to Govt; of Khyber Pakhtunkhwa E & S Education
Department Peshawar .
4. Miss, Zeenath Begum PET BPS 15 GGHS Shadam /now GGHS
Sura Tehsil Mandanr District Buner.

"Respondents"

APPELLANT

Through counsel



Rahim Khan

Adv High Court

Office ; at Distt; Courts Daggar Buner

Cell= 03439049185

Dated 25/03/2024



OFFICE OF THE DISTRICT EDUCATION OFFICER (F)
DISTRICT BUNER
PHONE & FAX No. 0939-510366
EMAIL: dcfemalebuner@gmail.com

Notification.

In pursuance of The Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2017 (Khyber Pakhtunkhwa Act No.1 of 2018) & Elementary and Secondary Education Department Govt of Khyber Pakhtun Khwa Notification No:SO(S/F)E&SED/3-2/2018/SITT/Contract dated 16-02-2018, Services of the following (26) (PET) Teachers appointed through NTS on adhoc/Contract basis, are hereby regularized in BPS-15, on the same posts in Teaching Cadre on the terms and condition given below with effect from the date of their 1st appointment as per detail given against each, in the interest of public service.

(PET Female)

Sr	Roll No	Name	Address	Total Marks [out of 200]	School	Appointment order No and dated	Extension order No and dated if any
PET-2014							
1 ✓	1420109	MEHNAZ	VILLAGE TANGO PULL CHOWK DISTRICT BUNER	107.76	GGMS BAJKATA	9443-48 DT 16-05-2014	25388-93 dt 25-5-2016
2 ✓	1420117	SHEEMA MUNIR	VILLAGE JOWKHELA PACHA KALAY DISTRICT BUNER	107.75	GGHSS PACHA KALAY	9443-48 DT 16-05-2014	---do---
3 ✓	1420115	ISHRAT BEGUM	VILLAGE CHEENA DISTRICT BUNER	105.8	GGMS CHANAR	9443-48 DT 16-05-2014	---do---
4 ✓	1420111	NAZIRA	VILLAGE BAJKATA DISTRICT BUNER	102.69	GGHS MATWANI	9443-48 DT 16-05-2014	---do---
5 ✓	1420108	POOJA BUT	VILLAGE GHURGUSHTO DISTRICT BUNER 15101-3975398-4	102.27	GGHSS CHINGLAI	9443-48 DT 16-05-2014	---do---
6 ✓	1420107	ZULFAT	VILLAGE NAWAGAI DISTRICT BUNER	99.74	GGHSS SHADAM	9443-48 DT 16-05-2014	---do---
7 ✓	1420096	SHABANA BEGUM	VILLAGE KALPANI DISRICT BUNER	96.95	GGHSS KALPANI	9443-48 DT 16-05-2014	---do---
8 ✓	1420100	AMINA BIBI	VILLAGE SHALBANDI DISTRICT BUNER	92.6	GGMS DAGGAR	9443-48 DT 16-05-2014	---do---
9 ✓	1420106	BASEERAT BEGUM	VILLAGE KANKOWAI DISTRICT BUNER	91.92	GGHS BAGRA	9443-48 DT 16-05-2014	---do---
10 ✓	1420103	SEHRISH KHAN	VILLAGE AGARAI DISTRICT BUNER 1501-2928067-8	88.57	GGHS BATANAI	9443-48 DT 16-05-2014	---do---
11 ✓	1420094	LUBNA BASEER	VILLAGE NAWAGAI DISTRICT BUNER	86.86	GGHS SOWAWAI	9443-48 DT 16-05-2014	---do---
12 ✓	1420099	NASIMA	VILLAGE HISAR DISTRICT BUNER	86.55	GGHS HISAR	9443-48 DT 16-05-2014	---do---
13 ✓	1420097	SHAZIA HAMID	VILLAGE NAWAGAI DISTRICT BUNER	85.78	GGHS MAKHRANA I	9443-48 DT 16-05-2014	---do---
14 ✓	1420120	GHUSIA	VILLAGE PACHA KALAY DISTRICT BUNER	84.91	GGMS ÉLAI	9443-48 DT 16-05-2014	---do---
15 ✓	1420114	SHAMEEM AKHTAR	VILLAGE MEKHOKHAPA DISTRICT BUNER	83.94	GGHS TOPAI	9443-48 DT 16-05-2014	---do---
16 ✓	1420121	ZEENAT BEGUM	VILLAGE NAWAGAI DISTRICT BUNER	83.57	GGMS MANGAL THANA	9443-48 DT 16-05-2014	---do---

K-12

8. The seniority inter-se of the employees, whose services are regularized under this Act within the same service or cadre, shall be determined on the basis of their merit position in such service or cadre.
9. Their seniority shall be determined on the basis of their continuous service in cadre, provided that if the date of continuous service in the case of two or more employees is the same, the employee older in age shall rank senior to the younger one.

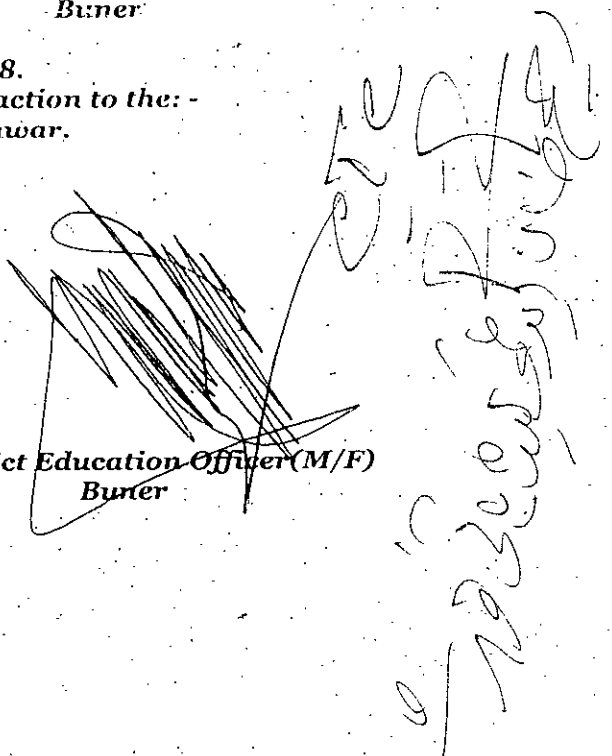
(BAKHT ZADA)
District Education Officer(M/F)
Buner

Endst: No. 5621-29 / Dated 06/03/2018.

Copy forwarded for information and necessary action to the:-

1. Director E&SE Khyber Pakhtunkhwa, Peshawar.
2. Deputy Commissioner Buner
3. District Accounts Officer Peshawar.
4. District Education Officer Buner
5. District Monitoring Officer Buner
6. ADEO(B&A) local Office
7. Principals/Head Mistresses Concerned
8. Teachers Concerned.
9. Office File.

District Education Officer(M/F)
Buner

A large, dense handwritten signature in black ink is written over the typed name of the District Education Officer. To the right of the signature, there are several vertical lines of handwritten text, possibly initials or a date, which are difficult to decipher due to the cursive style.

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CONSOLIDATED TRANSFER COMPANY

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Better Copy of Annex "E" K-15

BATTER COPY OF NOTIFICATION /TRANSFER ORDER ENDST; No.2180-85 DATED 08/07/2023

NOTIFICATION:

Consequent up on the recommendation of the Departmental promotion committee and in pursuance of KP Elementary & secondary Education Notification No. SO/B(1)/1-18/1 & SP/2012 dated 11/07/2012 & finance Department No.SO(FR)FD/10-22/(E) 2011 dated, 16/7/2012 & as Notified by the Director (E&S) KP Peshawar, vide Notification End; No.11-15/A-25/Promotion of PET B 15 to Senior PET(M/F)/2023 dated 27/6/2023, the following PETs B 15 are hereby promoted to the post of Senior PET B 16, with immediate effect.

S.No	NAME OF OFFICIAL	PRESENT PLACE OF POSTING	SCHOOL WHERE POSTED	REMARKS
1.	<u>Mehnaz</u>	<u>GGMS Bajkata</u>	<u>GGHSS Jowar</u>	<u>A.V.P</u>
2.	<u>Ishrat Baigam</u>	<u>GGMS Chanar</u>	<u>GGHS Sura</u>	<u>do</u>

CONSEQUENTIAL TRANSFER ADJUSTMENTS

THE FOLLOWING PETS ARE HEREBY CONSEQUENTIALLY TRANSFERRED /ADJUATED AT THE SCHOOLS NOTED AGAINST THEIR NAMES IN THEIR OWN PAY AND SCALE WITH IMMEDIATE EFFECT IN THE BEST INTEREST OF PUBLIC SERVICE.

S.NO	NAME OF OFFICIAL	PRESENT PLACE OF POSTING	SCHOOL WHERE POSTED	REMARKS
1	LUBNA BASEER	GGHS SURA	GGMS CHANAR	VACANT POST

TERRS AND CONDITIONS

1. They would be on probation for a period of one year , extendable for a other one year.
2. They will be governed by such rules and regulations as may be issued from time to time by Govt; .
3. Their services can be terminated at any time, in case if their performance is found unsatisfactory during their probation period. In case of misconduct they shall be proceeded under the rules framed from time to time.
4. Charge report shall be submitted to all concerned.
5. No TA/DA is allowed.
6. Their inter -se seniority on lower post will retain intact.
7. They will gave an undertaking to be recorded in their services books to the effect that if any payment is made to them in light of this order the same will be recovered and if they wrongly promoted they will be reverted.
8. The principals /Head mistresses are directed to check the documents of the promotes, in charge , handing over charge if they have not the required relevant qualification a per rules they may not be handed over charge of the post.

SD/-

(Dr . SHAMIM AKHTAR)
DISTRICT EDUCATION OFFICER (F) BUNER

8-16

The District Education Officer (Female) Distt. Buxar

Subject: Relief in transfer in near future

Dear Madam!

With due reverence and respect I beg to

state that I have been transferred to EGMs Chamas from EGMs Susa because I was appointed

against vacancy post at EGMs Susa after my appeal from to Junior teachers who were appointed in nearest

stations although I mentioned that situation on that time. Now I have been transferred to a far flung school

EGMs Chamas although it was my right to be near according to spouse policy. I belong to Nawagar and

my husband perform duty at EGMs Nawagar Buxar. Now I humbly request in your honour to give me

relief in my transfer to nearest schools of Tehsil Chanda in near future please of the school of EGMs SPET

post as degraded or PET post is created in this school or another nearest school then it will be considered

for me please

Yours obediently

Lubna Bases, PET

EGMs Chamas Buxar

Residence Nawagar Tehsil Mandam Distt Buxar

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To

An opeet AS "D" "D"

Asp "E" impugned order

P-17



OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) DISTRICT BUNER
PHONE & FAX NO. 0939-510366
EMAIL: deofemalebuner@gmail.com



NOTIFICATION:

Consequent upon the recommendation of the transfer committee issued vide this office Endst: No. 4546 dated: 14-12-2023, the competent authority is pleased to Transfer Miss: Zeenat Begum PET BPS-15 from GGHS Shadam to GGHS Sura against the vacant post of PET in her own pay & scale with immediate effect in the interest of public service.

Notes:-

1. No TADA is allowed.
2. Charge report should be submitted to all concerned.

(DR. SHAMIM AKHTAR)
DISTRICT EDUCATION OFFICER
(FEMALE) BUNER

Endst: No. 4547-53 / Dated: 14/12/2023.

Copy forwarded for information to:-

1. Director E&SE Khyber Pakhtunkhwa Peshawar.
2. District Monitoring Officer (EMA) Buner.
3. District Accounts Officer Buner.
4. B & AO Local Office.
5. Principal / Head Mistress Concerned.
6. Teacher Concerned.
7. Master File.

DISTRICT EDUCATION OFFICER
(FEMALE) BUNER

Alex E-1 P-18

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Copy of update Posts Position After the order impugned dated 14/11/2012 of GGHS, SUPA Buner

Government Selection



Controller General of Accounts, Pakistan
Islamabad

Only for KP Government

DDO CODE: BD6145

SEARCH

Details

View: Print Version Export

Personnel No	Employee Name	POSITION	DESCRIPTION	BPS	OPEN/FILLED
498908	ASIA	80732922	SECONDARY SCHOOL TEACHER	16	FILLED
273619	SHAKIRA BIBI	80698938	SECONDARY SCHOOL TEACHER		FILLED
273616	SHAHEEN NAZ	80698936	SENIOR CERTIFIED TEACHER		FILLED
851896	AFSHAN KHAN	80405940	SECONDARY SCHOOL TEACHER		FILLED
694021	NADIA SALEEM	80031244	SECONDARY SCHOOL TEACHER		FILLED
498909	DIL RURA	80031239	SENIOR DRAWING MASTER		FILLED
401573	HUMERA	80031238	SENIOR ARABIC TEACHER		FILLED
386172	HUMAIRA BIBI	80031237	SECONDARY SCHOOL TEACHER		FILLED
288030	ASIA RANI	80031232	SENIOR CERTIFIED TEACHER		FILLED
273581	SHAHNAZ BIBI	80031231	SENIOR THEOLOGY TEACHER		FILLED
		80519755	SENIOR CERTIFIED TEACHER		FILLED
		80825048	SECONDARY SCHOOL TEACHER II		OPEN
729614	ZEENAT BEGUM	80030837	PHYSICAL EDUCATION TEACHER	15	OPEN
549546	SHAHAT	80698937	CERTIFICATED TEACHER		FILLED
753670	BENIS NISAR KHAN	80553838	CERTIFICATED TEACHER		FILLED
360388	ISHRAT SHAFEE	80031235	QARIA		FILLED
985642	SOHA ALI	80031233	CERTIFICATED TEACHER		FILLED
845191	HALEEMA RAZIO	80816439	CERTIFIED TEACHER II	12	FILLED
700376	IHSANIYAT	80031243	JUNIOR CLERK	11	FILLED
661817	SABINA LATIF	80031242	LABORATORY ATTENDANT	03	FILLED
654695	MALIK ZADA	80031241	CHOWKIDAR		FILLED
357501	ASHIAR	80031235	NAIB QASID		FILLED
357498	LAL JELANI	80031234	SWEEPER		FILLED

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OFFICE OF THE PRINCIPAL
GOVERNMENT HIGHER SECONDARY SCHOOL NAWAGAI,
DISTRICT BUNER

Phone no. 0939-530099

Email: ghssnawagai@gmail.com

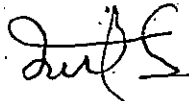
No. S123

Dated: 13 / 11 / 2023

SERVICE CERTIFICATE

Certified that Mr. GHAFOOR GUL S/O AMIR AHMAD GUL Resident of NAWAGAI TEHSIL MANDANR BUNER has been serving as Senior Drawing Master BPS-16 in the Elementary and Secondary Education Department Buner since April, 2019 up to date.

Now he is performing his duties as Senior Drawing Master BPS-16 at GHSS Nawagai BD 6046, District Buner. He is a hardworking, honest and devoted teacher.


PRINCIPAL
G.H.S.S Nawagai
Distt. Buner
PRINCIPAL
GHSS Nawagai Buner

Anex: "F" P. 20

By hand

The Director
Education E & S P
K.P Peshawar.

Through; Proper channel .

Subject ; DEPARTMENTAL APPELA AGAINST THE ORDER & NOTIFICATION IMPUGNED PASSED BY THE DEO (F) BUNER VIDE Endo; No. 4547-53 DATED 14/12/2023, WHERE BY Miss, ZENZTH BAIGAM.PET B 15 HAS BEEN WRONGLY AND BY UN DUE FAVOUR, ON MALA FIDE INTENTION, DESPITE THE ASSURANCE ALREADY MADE BY THE DEO (F) BUNER ON DATED 22/7/2023 IN FAVOUR OF THE APPELLANT REGARDING THE RETRANSFERRING AND POSTING OF THE APPELLANT, AGAINST THE POST OF PET B 15 IN GGHS SURA. AS AND WHEN BECOME AVAILABLE

Respected SIR,

Kindly it refers to the order/ notification End; NO.4547-53 dated 14/12/2023, passed by the DEO (F) Buner , in favour of Miss Zeenat Begum PET B 15, who has wrongly been transferred from GGHS shadam to GGHS Sura against the vacant post of PET B 15, while the DEO (F) Buner, while transferring the appellant from the same station GGHS Sura vide order /Notification End; no.2180-85 dated 08/07/2023, from GGHS Sura to GGMS Chanar, on the pretext that the same post has been upgraded to SPET B 16 , and it was assured on dated 22/07/2023, that when the post of PET B 15 become available here in the same school, the appellant will be retransferred /reposted against the same post, who was transferred and posted on the same post earlier, in the same school, vide order End; No. 10324-29 dated 18/10/2018, according to the spouse policy.

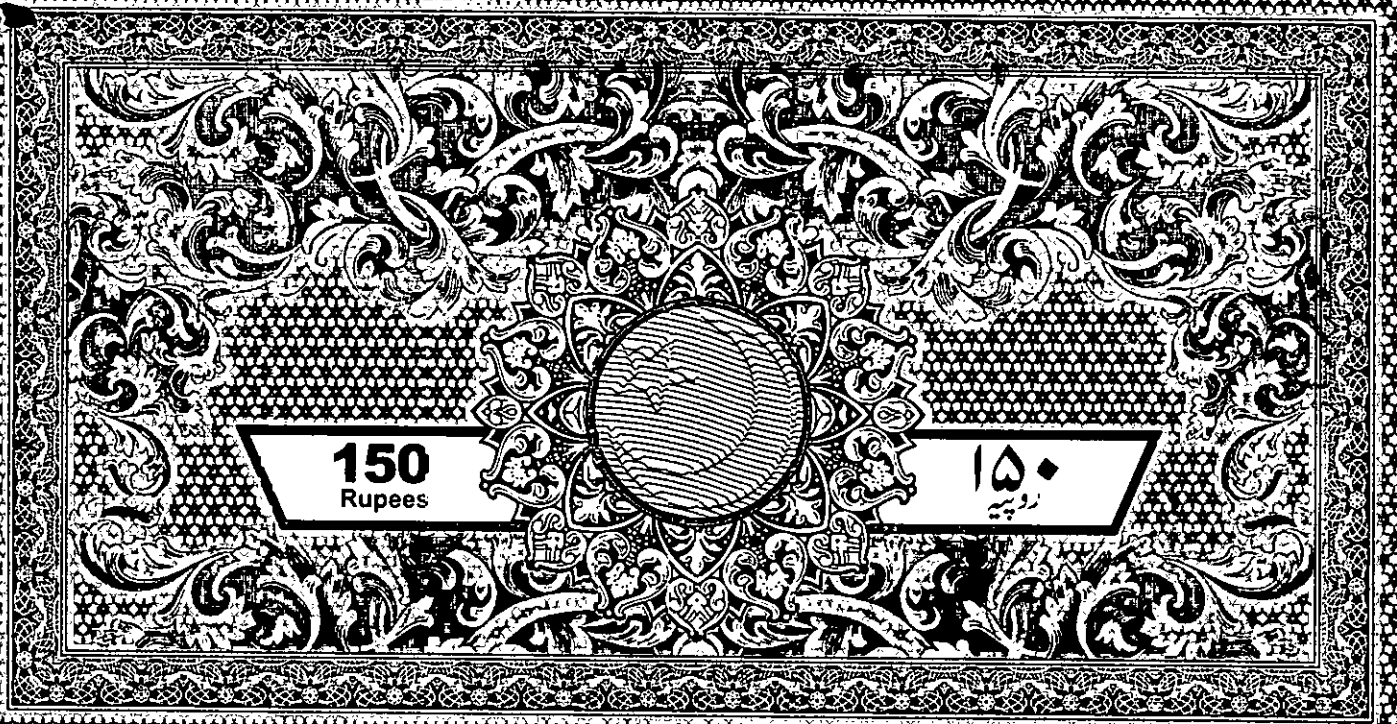
Hence after when the post of PET B 15 if either was available or might now become available, the appellant has superior right , being declared by the DEO (F) Buner himself, the order/Notification regarding the transfer of Miss , Zenat Baigam PET B 15 is wrong and against the due assurance, made by the DEO (F)Buner , in favour of the appellant .

Therefore it is requested ythat on acceptance of the instant appeal the appellant may be retransferred and posted in GGHS Sura Buner Against the post f PET B 15 by setting a side o the order impugned Endo; No. 4547-53 DATED 14/12/2023, issued by the DEO (F) Buner in favour of Miss, Zenat Begam PET B 15 GGHS Shadam Buner.

Lubna
Appellant
Miss, Lubna Baseer
PET B 15 GGMS Chanar
Dated,16/12/2023.

Serial No. 324
Dated 21/12/2023
Office of the Director
Education
K.P Peshawar

CTE
[Handwritten signature]



کعدالت عالیہ سیتھا در عالی کورٹ ڈاں الفضا و منگورہ پننج سوات

عنوان مقدمہ: لہنی لہجر بنام
 حکمہ تعلیم ریٹیشن
 قاضی لہنی لہجر PET زوم غفور گل سنگھ ناوہ گسر علاقہ چلم تحصیل منڈلہ ضلع لہجر
 کی پور برقرار صلاح رہ قابل ہوش خواص مقدمہ بلاکس جسرو اکراہ کر قسیر کر دہنی
 پور کر من اپیلرٹنگ کی جانب سے لغو سروس کر بیٹھوں ریٹیشن لہجوان بار
 دائر کرئی ہے چونکہ من مقدمہ اپیلرٹنگ نڈا نہیں پور پیردہ نشین ہون اور دیگر
 خانہ داہا رفور کی خاطر حاصل عدالت اور پور ما مقدمہ سے اد جاہہ ہوں
 اسلئے رہنی جانب سے مکتبی غفور گل ولد لہجرا گل سنگھ ناوہ گسر مقوم
 خود کو رہنا حق رفور کرئی رضیا رت دہنی ہوں کر وہ عدم موجودگی
 ماقدمہ کہاں لہج مقدمہ بار ازید جوہر عدالت ہوں پور ما مقدمہ کر سنگا
 نیز حق خاصہ جانب سے وکیل اہل پور کر لہجرا کر رت دہنی
 بیان خلافی دائر کرئی اور پور مقوم کر خلافی کر لہجرا کر
 اسلئے ماقدمہ اپیلرٹنگ کی جانب سے ریٹیشن کر
 کرئی و لہجرا کر رہنا پور اور رضیا حاصل ہوگا جو کہ ماقدمہ
 کو قابل قبول ہو کر اور کو بھی اعتبار حق نہیں کرئی

(عزیزہ مہنویہ لہجری)

ATTESTED
 Muhibullah Advocate
 Notary Public
 District Courts Daogar, Buner
 No. 102
 Date 12/7/02

پاکستان
 District Courts
 Buner
 Notary Public
 No. 102
 Date 12/7/02

TESTED
Munibullah Advocate
Notary Public
District Courts Dagar Buner
No. 649
Date: 27/7/23

Petition Writer 1st Grade
No. 182
Date: 27/7/23
District Courts Dagar Buner

15101-0394983-7

15101-0384241-7

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پانچ سو روپے کی رقم



150 Rupees

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