

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Execution Petition#631/2024

In

Service Appeal # 846/2024

Mst. Shahida Parveen, (MC) District Education Officer (BPS-19) DI. Khan.....Appellant.

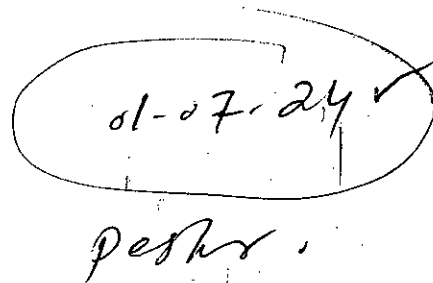
VERSUS

Govt: of Khyber Pakhtunkhwa & others.....Respondents.

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Deponent


01-07-24 ✓
Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Execution Petition # 631/2024

In

Service Appeal # 846/2024

Govt. of Khyber Pakhtunkhwa & others..... **Appellants**

VERSUS

Mst. Shahida Parveen, (MC) District Education Officer (BPS-19) DI Khan **Respondent**

REPLY OF THE EXECUTION PETITION NO. 631/2024 IN SERVICE APPEAL NO. 846/2024 ON BEHALF OF THE RESPONDENTS. 1-2

Respectfully Sheweth,

The Respondents submit as under:-

PRELIMINARY OBJECTIONS:-

1. That the appellant has got no cause of action/locus standi for filing of this Execution Petition as there is no irregularity or non-compliance on the part of the respondents.
2. That the instant Execution Petition is bad in its present form, therefore, liable to be dismissed summarily.
3. That the applicant has concealed the material facts from this Hon'able Tribunal, hence the instant application is not maintainable.
4. That the applicant has not come to this Hon'albe Tribunal with clean hands.
5. That the applicant has filed the instant Execution Petition with malafide intention just to pressurize the Respondent for gaining illegal service benefits.
6. That the instant Execution Petition is against the prevailing law, hence not maintainable.
7. That the applicant is estopped by his own conduct to file the instant Execution Petition.
8. That the instant Execution Petition is not maintainable in the present circumstances of the issue.
9. That the Notifications dated 10-05-2024 & 11-06-2024 of the Respondents are competent and in accordance with existing law/rules, therefore, liable to be maintained.

FACTS.

1. That Para-I needs no reply.
2. That Para-2 is correct to the extent that Service Tribunal vide ordersheet dated 14-06-2024 directed as follows:-

“Alongwith with the appeal, there is an application for suspension of operation of impugned order dated 10-05-2024. Notice to this application be issued to respondents. In the meanwhile, operation of impugned order shall remained suspended, **if not acted upon earlier**”.

2

It is pointed out that the impugned transfer notification **has already been acted upon** as reflected from the following points:-

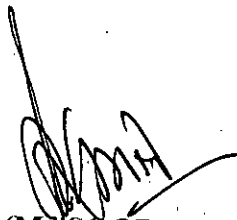
- i. The real situation after notification dated 10-05-2024 was that the respondent No. 03 has already assumed the charge of District Education Officer (Female) DI. Khan vide office order No. 5000-09 dated 11-05-2024 (**Annexure-A**).
- ii. That salary of the private respondent No. 03 has already been activated by the District Accounts Office D.I.Khan and shown on the official ID of the District Education Officer (Female) DI. Khan since 11-05-2024 (**Annexure-B**).
- iii. That the private respondent No. 03 in the capacity of District Education Officer (Female) DI. Khan has attended in person the DB in the Honorable Peshawar High Court DI. Khan Bench on 03-06-2024 and 06-06-2024 in many cases in discharge of her official duties. (**Annex-C**).
- iv. That the private respondent No.03 (in the main appeal) in the capacity of DEO Female D.I.Khan has appointed namely Naila Bibi as Arabic Teacher vide Notification bearing No.AT/ Appointment/PHC/NTS/2014/6230-39 dated 05.06.2024 in pursuance of the directions of the Honorable PHC D.I.Khan Bench (**Annex-D**).
- v. That the private respondent No.03 in the capacity of DEO Female D.I.Khan have made transfers of teachers through various Orders/Notifications (**Annex-E**).
- vi. The private respondent No. 03 also attended various meetings convened by District Administration and others line and allied departments regarding the issues of Elementary & Secondary Education District DI. Khan. (**Annex-F**)
- vii. That the appellant was initially placed at the disposal of Directorate vide the impugned order a later on posted as Director HR, Elementary & Secondary Education Foundation vide order No. SO(AB)E&SED/15-2/ESEF/2024 dated 12-06-2024 on deputation for the period of 03 years (**Annexure-G**). Furthermore, the appellant arrived and convened meeting with staff of Elementary & Secondary Education Foundation.
- viii. That the Private Respondent No.3 in the capacity of DEO Female D.I.Khan submitted report to Deputy Commissioner D.I.Khan vide letter No.001-005 dated 15.06.2024 regarding untoward situation happened on 15.06.2024 whereof the ex-DEO Female D.I.Khan now appellant entered into the office of DEO Female D.I.Khan forcefully, in the pretext of the aforementioned order of Khyber Pakhtunkhwa Service Tribunal and shouting that she had been restored as DEO Female D.I.Khan and took unto the possession of the all the relevant record from the dealing staff such as the diary/dispatch registers etc (**Annexure-H**). The Elementary & Secondary Education Department vide letter dated 21.06.2024, addressed to Director E&SE to direct the appellant (Shahida Parveen) to refrain from any conduct contrary to the official norms and discipline. (**Annexure-I**).

3

3. Para-3 is incorrect & denied. The applicant has not submitted the order dated 14-06-2024 alongwith application to the respondents for implementation.
4. Para-4 is totally incorrect and against the real facts as already explained before this Service Tribunal in foregoing paras.

PRAYER:-

In view of the above submissions, it is humbly requested that this Honorable Tribunal may very kindly turned down the instant Execution Petition.



**(MASOOD AHMAD)
SECRETARY E&SED
(Respondent No. 01&02)**

(4)

BEFORE THE HON'BLE SERVICE TRIBUNAL PESHAWAR

Execution Petition# 631/2024

In

Service Appeal# 846/2024

Govt. of Khyber Pakhtunkhwa & others..... Appellants

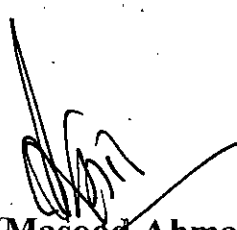
VERSUS

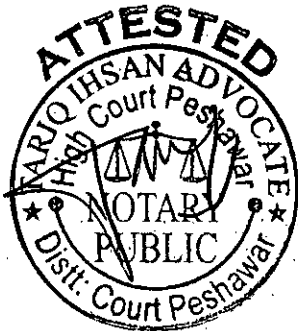
Mst. Shahida Parveen, (MC) DEO (BPS-19)..... Respondent

AFFIDAVIT

I, Mr Masood Ahmad, Secretary, Elementary & Secondary Education, Department do hereby solemnly affirm and declare that the contents of the accompanying application for salary release are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

It is further, stated on oath that in this appeal the answering Respondent have neither been placed ex-parte nor has their defense been struck off.


(Masood Ahmad)
SECRETARY E&SED
(Respondent No. 01&02)



3



**GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**

Block "A" Civil Secretariat, Peshawar

Phone No. 091-9211128

AUTHORITY LETTER

It is certified that **Mr. Sajid Ullah, Section Officer (Litigation-II)** Elementary & Secondary Education Department, Government of Khyber Pakhtunkhwa, Peshawar is hereby authorized to submit parawise comments / reply on behalf of Secretary Elementary & Secondary Education Department, Peshawar, in **Execution Petition No. 631/2024 in Service Appeal # 846** case titled Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar Versus Mst. Shahida Parveen, (MC) District Education Officer (BPS-19).

**(Masood Ahmad)
SECRETARY E&SED
(Respondent No. 01&02)**



B-3

[QR Code]

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. (091) 9210626

Dated, the Peshawar 10th May, 2024

NOTIFICATION

NO.SO(MC)E&SED/4-16/2024/DEOs /D.I.Khan; The following postings/ transfers of the officers are hereby ordered with immediate effect, in the best public interest.

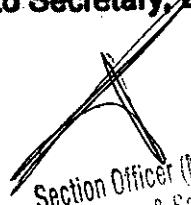
Sr. No	Name & Designation	From	To
1.	Mst. Syeda Anjum (MC BS-19)	Awaiting Posting	DEO (Female) D.I.Khan Vice.S.No.2
2.	Mst. Shahida Parveen (MC BS-19 ACB)	DEO (Female) D.I.Khan	Report to Directorate of E&SE Peshawar

**SECRETARY TO THE GOVT: OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT**

Endst: of even No.& date:

Copy forwarded for information to the: -

1. Principal Secretary to Chief Minister Khyber Pakhtunkhwa.
2. Accountant General, Khyber Pakhtunkhwa, Peshawar.
3. Divisional Commissioner D.I.Khan
4. Deputy Commissioner D.I.Khan.
5. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
6. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
7. District Education Officer (Female) D.I.Khan
8. District Accounts Officer D.I.Khan.
9. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.


Section Officer (Management Cadre)
Elementary & Secondary Edu. Deptt.
Govt. of Khyber Pakhtunkhwa


SECTION OFFICER (Management Cadre)

(A)

(9)

B-4



**OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) DERA ISMAIL KHAN**

CHARGE ASSUMPTION CERTIFICATE

I Mst: Syeda Anjum has assumed the charge of the post District Education Officer (Female) Dera Ismail Khan to day on 11-05-2024 (F.N) vide Secretary Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department Peshawar Notification No.SO(MC)E&SED/4-16/2024/DEOs/DIKhan Dated the Peshawar the 10-05-2024, issued by the section Officer (Management Cadre) Khyber Pakhtunkhwa, Peshawar.

DISTRICT EDUCATION OFFICER
(FEMALE) DERA ISMAIL KHAN

Endst: No. 5000-0091

Dated DIKhan the 11/05/2024.

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

1. PS to Secretary E&SE Department Khyber Pakhtunkhwa Peshawar.
2. Director E&SE Khyber Pakhtunkhwa Peshawar.
3. Director EMIS, E&SE Department Khyber Pakhtunkhwa Peshawar.
4. Accountant General, Khyber Pakhtunkhwa Peshawar.
5. Divisional Commissioner, D.I.Khan.
6. Deputy Commissioner, D.I.Khan.
7. District Accounts Officer D.I.Khan.
8. Officer concerned
9. Office File.

Section Officer (Management Cadre)
Elementary & Secondary Edu: Deptt:
Govt: of Khyber Pakhtunkhwa

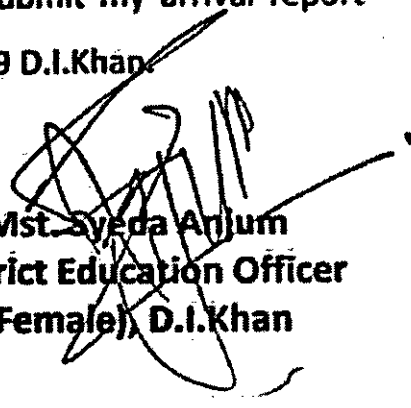
DISTRICT EDUCATION OFFICER
(FEMALE) DERA ISMAIL KHAN

(A) (B)
B-5
The Honorable Secretary,
Elementary & Secondary Education,
KPK Peshawar.

Subject: ARRIVAL REPORT

Respected Sir,

In compliance with the Orders of Honourable Secretary, E&SE KPK Peshawar contained in Endstt: No. NO.SO(MC)E&SED/14-16/2024/DEOs/D.I.Khan the following Posting/ Transfer of the officers dated Peshawar the 10-05-2024, Mst. Syeda Anjum DEO (Female) D.I.Khan (BPS-19) do hereby submit my arrival report today on 11-05-2024 F.N, on the post of DEO (Female) BPS-19 D.I.Khan.

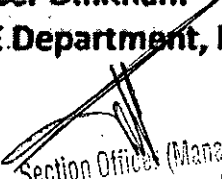

Mst. Syeda Anjum
District Education Officer
(Female), D.I.Khan

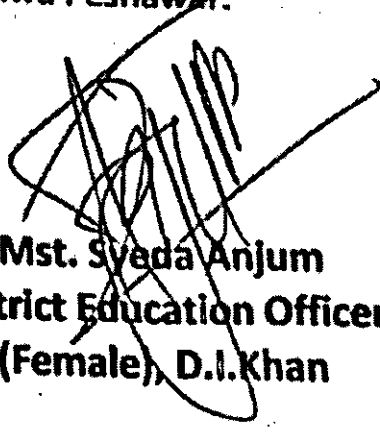
Endstt: No. 506-18 DEO/F/D.I.Khan

Dated: 11 / 05 / 2024

Copy forwarded for information & necessary action to:

1. Principal Secretary to Chief Minister Khyber Pakhtunkhwa.
2. Accountant General, Khyber Pakhtunkhwa, Peshawar.
3. Divisional Commissioner D.I.Khan.
4. Deputy Commissioner D.I.Khan
5. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
6. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
7. District Education officer (Female) D.I.Khan.
8. District Accounts Officer D.I.Khan.
9. PS To Secretary, E&SE Department, Khyber Pakhtunkhwa Peshawar.


Section Officer (Management Cadre)
Elementary & Secondary Edu. Deptt.
Govt. of Khyber Pakhtunkhwa


Mst. Syeda Anjum
District Education Officer
(Female), D.I.Khan

(B)

(9)



**OFFICE OF THE DISTRICT ACCOUNTS OFFICER
DERA ISMAIL KHAN**

CERTIFICATE

Certified that pay of Mst. Syeda Anjum DEO (Female) Dera Ismail Khan has been activated on 11/05/2024 due to her transfer order vide Gazette of Govt of KPK E&SE Department Notification No. 8005/10/2024 dated 10/05/2024 DFOs/DIKhan, dated the Peshawar 10/05/2024.

~~_____~~

[Signature]
DISTRICT ACCOUNTS OFFICER
DERA ISMAIL KHAN

PAY SLIP PRINTING

SI:1

P Sec:001 Month:May 2024
DI6275 -District Education Officer
DISTRICT EDUCATION OFFICE

Pers #: 00577127 Buckle:

Name: SYEDA ANJUM
DISTRICT EDUCATION OFFICE

NIN:
GPF #:
Old #:

CHIC No.121010911939E

GPF Interest Free

19 Active Temporary

DI6275

PAYS AND ALLOWANCES:

0001-Basic Pay	87,840.00
1947-Medical Allow 15% (16-22)	1,846.00
214E-15% Adhoc Relief All-2013	1,225.00
2199-Adhoc Relief Allow @10%	844.00

Gross Pay and Allowances

91,755.00

DEDUCTIONS:

GPF Balance 7,180.00
3543-Professional Tax

Subrc: 7,180.00
2,000.00

(Signature)
Section Officer (Management Cadre)
Elementary & Secondary Ed. Deptt.
District Education Office

Total Deductions


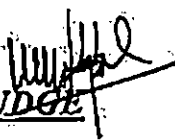
9,180.00

(D)

(14)

PESHAWAR HIGH COURT, D.I.KHAN BENCH


FORM OF ORDER SHEET

Date of order or proceedings (1)	Order or other proceedings with signature of Judge(s). (2)
06.6.2024	<p><u>C.O.C.No.1210-D/2019 with</u> <u>C.M.Nos.1211-D/2019, 35, 359-D/2023.</u></p> <p><u>Present:-</u> Muhammad Rizwan Khan, Advocate for the petitioner.</p> <p>Mr. Inamullah Khan, Asstt: A.G. alongwith Ms. Syeda Anjum DEO (F) and Dr. Imran Ali Shah Litigation Officer DEO (F), D.I.Khan.</p> <p>***</p> <p><u>Dr. Khurshid Iqbal, J.-</u> At the outset, the latter produced appointment order of the petitioner, whereby the petitioner has been appointed as Arabic Teacher (BPS-15). In view thereof, this COC petition has served its purpose, which stands disposed of.</p> <p><u>Announced.</u> <u>Dt: 06.6.2024.</u></p> <p style="text-align: right;"><u>Page 2</u> <u>JUDGE</u></p> <p style="text-align: center;"> Section Officer (Management Cadre) Elementary & Secondary Edu. Deptt. Govt. of Khyber Pakhtunkhwa</p> <p style="text-align: right;"> <u>JUDGE</u></p>

Kifayat/*

(D.B)

Hon'ble Mr. Justice Fazal Subhan
Hon'ble Mr. Justice Dr. Khurshid Iqbal

office

11/06/2024.



OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) DERA ISMAIL KHAN
(0966-9280131), emisfdikhan@gmail.com



APPOINTMENT ORDER:

In compliance to the worthy Judgment rendered by the Honourable Peshawar High Court DIKhan Bench, dated: 23.10.2018, in WP 649-D of 2014, titled as Naila Bibi vs Government of KP, and Worthy Order dated 03.06.2024 in the on-going COC Petition No.1210-D of 2019, and under the *Rule 10 (2) Of The Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989*, after allowing extra marks for her Islamic Asnad of Shahada Alamiya (MA), Shahada Alia (BA), Shahada Sanviya Khasa (FA) and upon the recommendation of the Departmental Selection Committee, Appointment on OPEN MERIT is hereby ordered in the public interest in respect of the following female candidates against the post of Arabic Teacher (Female) BPS-15 (Rs.23920-1980-83320) fixed plus usual allowances as admissible to them under Rules, for one year, on Ad hoc/ Contract basis through NTS 2014, under the existing policy of the Government of Khyber Pakhtunkhwa, with terms and conditions given below, with immediate effect.

S. #	NTS Roll No.	Name	Father Name	Date of Birth	CNIC #	Merit Score	Posted at	REMARKS
1.	1740576	NAILA BIBI	ABDUL HAMEED	15/APR/ 1987	12101-5545212-4	107.63	GGMS Gara Muhabbat	Her age shall be considered as on 20.01.2014, the last date of application under the Advertisement of NTS 2014 Batch.

NOTE:

NO TA/DA etc. is allowed. Charge report should be submitted to all concerned.

TERMS AND CONDITIONS:

1. Their Appointment is made purely on adhoc basis, initially, for one year from the date of issuance of this order.
2. They should not be handed over charge if they exceed 35 years or fall below 18 years of age. Age relaxation case may be submitted to the competent authority (if required). Age may be considered as on 20.01.2014, the last date of Application for NTS 2014.
3. The Appointment is made with the condition that the certificate/documents of the appointees must be verified from the concerned authorities by the DDO concerned; anyone found producing bogus Certificate, the DDO will report to the law enforcing agencies for further action and/or this appointment order will be cancelled automatically. The candidate concerned will have no right of appeal at any forum. Expenses on verification of the certificates/degree will be borne by the appointees.
4. Their services are liable to termination on one month's notice from either side. In case of resignation without notice her one-month pay/ allowances shall be forfeited to the Government Exchequer.
5. District Accounts Officer shall release their salary on production of duty certificate duly signed by concerned DDO and countersigned by the undersigned.
6. Under the authority of No. SORII(S&GAD)1(26)/86, dated 20.10.1986, they should join their post within 30 days of the issuance of this Order. In case of failure to join the post within stipulated period, her appointment will stand expired automatically and no subsequent appeal etc. shall be entertained.
7. Under Rule 11, Sub-rule (5) of THE KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT, PROMOTION & TRANSFER) RULES, 1989, Health Fitness and Age Certificate should be produced from the Medical Superintendent, D.I.Khan, before taking over charge.
8. She will be governed by such rules and regulations as may be issued from time to time by the Government.
9. Their services shall be terminated at any time, in case their performance is found unsatisfactory during their Adhoc/ Contract period.
10. In case of misconduct, they shall be proceeded under the rules framed from time to time.
11. In case of acceptance of the appeal by the competent authority in respect of another deserving, yet, leftover meritorious candidate, this appointment order shall be withdrawn to the extent of below merit candidate and re-adjustment will be carried out in this regard.

Section Officer (Management Cadre)
Elementary & Secondary Education
Govt. of Khyber Pakhtunkhwa

(13)

13. The place of posting/ adjustment shall be considered as per discretion of the competent authority and no candidate shall approach / appeal for appointment/ adjustment at a specific station as a vested right.
14. Before handing over charge, once again their documents shall be checked by DDO concerned; and if the appointee does not acquire the required qualifications, as per rules, or in case of any degree/certificate is found to be issued after January, 20, 2014, against which she claimed score for merit they may not be handed over charge of the post.
15. They will be trained for 9 months in-service mandatory professional training at PITE/ RITE.
16. Their seniority will be determined together with the NTS 2014 batch though after regularization as admissible under the relevant rules. She shall not be eligible for Back benefits etc. except seniority.
17. Joining of Post/ job shall be deemed as acceptance of all the terms and conditions mentioned above.

(SYEDA ANJUM)
DISTRICT EDUCATION OFFICER
(FEMALE) DERA ISMAIL KHAN

6230-39
Endst. No./AT Appointment/ PHC/NTS 2014/ Dated 05/10/2024.

Copy forwarded to the:

1. Addl: Registrar PHC, as a compliance report in COC 1210 D of 2019
2. PA to Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. Deputy DEO (Female) D.I.Khan.
4. Deputy Commissioner, D.I.Khan.
5. District Accounts Officer, D.I.Khan (with the request that her age may be considered as found on 20.01.2014, the last date of Application for NTS 2014.)
6. District Monitoring Officer (IMU) D.I.Khan.
7. Focal Person IMU Local Office D.I.Khan.
8. Principal/ Headmistress/DDO Concerned.
9. Candidate concerned.
10. Master file.

(SYEDA ANJUM)
DISTRICT EDUCATION OFFICER
(FEMALE) DERA ISMAIL KHAN



**OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) DERA ISMAIL KHAN**



Transfer File No.1 Vol-1 Primary Branch.

ORDER.

The Transfer of the following female Teacher is hereby ordered in the interest of public service with immediate effect.

S.No.	Name & Desig;	From	To	Remarks.
1	Memoona Yasmin PST	GGPS Mian Wada	GGPS Hafiz Abad	A.V.P
2	Robina Jabbar PST	GGPS Babbar Pacca	GGPS ChahLal Wala	A.V.P
3	Hina Siraj PST	GGPS Takwara No.2	GGPS Arra	A.V.P
4	Mehar-un-Nisa PSHT	GGPS Wanda Ali	GGPS Katta Khel	A.V.P

Note. 1- Charge Reports should be submitted to all concerned.
2- No TA/DA is allowed.

SD/-

DISTRICT EDUCATION OFFICER
(FEMALE) DERA ISMAIL KHAN

7/21-25
No. _____

Dated Dikhan the 13 / 06 / 2024.

Copy to the:-

- 1- District Accounts Officer DIKhan.
- 2- District Monitoring Officer DIKhan.
- 3- SDEO (F) Concerned.
- 4- Official concerned.
- 5- EMIS Branch, local office.

Section Officer (Management Cadre)
Elementary & Middle
Govt. of Khyber Pakhtunkhwa

13/06/24
DISTRICT EDUCATION OFFICER
(FEMALE) DERA ISMAIL KHAN

(E) (B) (C)



OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) DERA ISMAIL KHAN

File. No. 1/Vol.No.1/AT/TT Transfer order/Estb: Scry/DEO (F) DIK

OFFICE ORDER:-

The Transfer of the following female Teacher is hereby ordered in the interest of public service with immediate effect.

Name & Desig;	From	To	Remarks.
Safia AT	GGMS Awan	GGMS Shahdau	A.V.P
Hamdia Sana TT	GGMS Saidallian	GGMS Basti Dhappan Wali	A.V.P

Note:-

1. No TA/DA is allowed.
2. Charge report should be submitted to all concerned.

Endst No. 7095-78

[Signature]
 District Education Officer
 (Female) Dera Ismail Khan
 12/06/2024
 Dated the 12/06/2024

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

1. Deputy District Education Officer (F) DIKhan.
2. District Monitoring Officer (EMA) DIKhan.
3. Headmistresses concerned.
4. Teacher concerned.

[Signature]
 Section Officer (Management Cadre)
 Elementary & S
 Govt. of Khyber Pakhtunkhwa

[Signature]
 District Education Officer
 (Female) Dera Ismail Khan
 12/06/2024



(16)

**OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) DERA ISMAIL KHAN**

Phone No. 0966-9280133, emisfdikhan@gmail.com

To,

The Deputy Commissioner, Dera Ismail Khan.

Subject:

Special Report in Context of Order dated 14.06.2024 Of The Honourable Khyber
Pakhtunkhwa Service Tribunal in Service Appeal No.846 of 2024, Shahida Perveen vs
Secretary Education etc.

Respected Sir!

The undersigned is officially obliged to inform your good self on the subject mentioned above and to convey an untoward situation happened on 15th of June 2024, whereof, the Ex-DEO Female DIKhan, Mrs. Shahida Perveen, entered into office of the DEO (Female) DIKhan forcefully, in the pretext of the aforementioned order of the Honourable KP Tribunal and shouting that she has been restored as DEO Female DIKhan etc. and took unto possession of all the relevant official record from the dealing staff, such as the Diary/ Dispatch registers etc., and further enquired about the Official car of the DEO Female.

It is pertinent to mention that the said order of the Honourable Tribunal was misconceived and misinterpreted by the Predecessor of this office. In this connection, the Operative Para of the same order is reproduced as under:

2. Along with the appeal, there is an application for suspension of impugned order dated 10.05.2024. Notice of this be issued to respondents. In the meanwhile, operation of impugned order shall remain suspended, if not acted upon earlier. (Annexure A, P: 1-2)

It is further added that the undersigned has already assumed the charge of the post of DEO (Female) DIKhan on 11th of May 2024 vide office order No.5000-09, dated 11.05.2024, under the SO(MC)/E&SED/4-16/2024/DEOs/D.I.Khan, dated 10.05.2024, with a copy endorsed to your good office as well; Salary of the undersigned has already been activated on the Official ID of the DEO (Female) DIKhan, since 11th of May 2024. **(Annexure B, P: 3-6)**

Moreover, it is added that undersigned being DEO Female DIKhan, has attended in person the DB in the Honourable Peshawar High Court DIKhan Bench, on 03.06.2024 and 06.06.2024 in many cases in discharge of my official duties. Likewise, many official meetings convened by the District Administration and others line and allied departments regarding the issues of Education Department were graced by the undersigned in public service.

It is not out of place, to mention that the predecessor was initially placed at the Disposal of the Directorate vide the impugned order and later on posted as Director HR, *Elementary & Secondary Education Foundation* (ESEF) vide order No.SO(AB)E&SED/15-2/ESEF/2024, dated 12.06.2024, on deputation for the period of 3 years by the competent authority, knowing that undersigned has taken over charge and started official duties to the best of my abilities. **(Annexure C, P: 7)**

In view of the above, it is clear that the impugned order issued by the competent authority was implemented and complied in letter and spirit. Hence, the order of the Honourable Tribunal is not applicable to the extent of the undersigned because the same was already acted upon.

Therefore, it is requested that; the Ex-DEO, Mrs. Shahida Perveen may be advised to join her duties on her place of posting under the order No. SO(AB)E&SED/15-2/ESEF/2024, dated 12.06.2024, being a civil servant; and **not to interfere** in the smooth running of the official matters and assignments of this office, so that the undersigned may continue my official responsibilities with peace of mind in the best interest of the government as well the public.

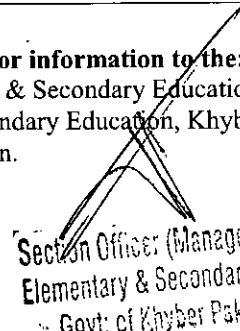

DISTRICT EDUCATION OFFICER
(FEMALE) DERA ISMAIL KHAN

Endst: No. 001-005

Dated D.I.Khan The, 20. 06. 2024

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

1. PS to Secretary, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. PA to DEO (Female), DIKhan.
4. Master file.


Section Officer (Management Cadre)
Elementary & Secondary Edu. Deptt.
Govt. of Khyber Pakhtunkhwa


DISTRICT EDUCATION OFFICER
(FEMALE) DERA ISMAIL KHAN



(F) (17)

**OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) DERA ISMAIL KHAN**

Phone No. 0966-9280133, emisfdikhan@gmail.com

To: The Deputy Commissioner, Dera Ismail Khan

Subject: Joining a meeting at Directorate of KP E&SE Department Peshawar

Memo:

Reference to the Directorate of KP Elementary and Secondary Education Department Peshawar, Letter No. 8056-8120,/DD(PnD), Dated 12.06.2024, (Annexed herewith) whereby the undersigned being DEO Female DIKhan has to join a necessary meeting at the Directorate of KP Elementary and Secondary Education Department Peshawar on Monday, the 24th of June, 2024.

Dr. Farhat Yasmeen, Deputy DEO Female DIKhan, is hereby directed to take care of the routine office work of the undersigned in my absentia, except the works related to financial sanctions, transfers and appointments. Report is hereby submitted for information, please.

(MRS. SYEDA ANJUM)
DISTRICT EDUCATION OFFICER
(FEMALE) DERA ISMAIL KHAN

Endst: No. 63-67 Dated D.I.Khan The, 22.06.2024

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

1. PS to Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. PA to Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. Deputy DEO Female DIKhan.
4. PA to DEO (Female), DIKhan.
5. Master file.

DISTRICT EDUCATION OFFICER
(FEMALE) DERA ISMAIL KHAN

Section Officer (Management Cadre)
Elementary & Secondary Edu: Deptt:
Govt. of Khyber Pakhtunkhwa



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GOVERNMENT OF KHYBER PAKHTUNKHWA
Elementary & Secondary Education Department
Block "A" Opposite MPA's Hostel, Civil Secretariat, Peshawar
Phone: 091-9223530, Fax: 091-9211419

Dated Peshawar the June 12th, 2024

NOTIFICATION

No. SO(AB)E&SED/15-2/ESEF/2024: Mst. Shahida Parveen (MC BS-19 presently waiting for posting in E&SE Department) is hereby transferred/posted against the vacant post of Director (HR/Admin) in Elementary & Secondary Education Foundation, on deputation basis, for a period of three years, with immediate effect.

2- The terms & conditions of deputation of the above officer will be settled in due course of time.

Secretary to Govt. of Khyber Pakhtunkhwa
E&SE Department

Endst: of even No. & date

Copy is forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa.
2. Managing Director, Elementary & Secondary Education Foundation.
3. Director, Elementary & Secondary Education Khyber Pakhtunkhwa.
4. Section Officer (Management Cadre), E&SE Department.
5. PS to Secretary, E&SE Department, Government of Khyber Pakhtunkhwa.
6. PA to Additional Secretary (Estab/Gen), E&SE Department.
7. PA to Deputy Secretary (AB), E&SE Department.
8. Officer concerned.

Section Officer (Management Cadre)
Elementary & Secondary Edu. Dept.
Govt. of Khyber Pakhtunkhwa

(QAMAR ABBAS BANGASH)
Section Officer (Autonomous Bodies)



(H) (19)

**OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) DERA ISMAIL KHAN**

Phone No. 0966-9280133, emisfdikhan@gmail.com

To,

The Secretary
Khyber Pakhtunkhwa Elementary & Secondary Education Department
Peshawar.

Subject:

Special Report in Context of Order dated 14.06.2024 in SA No.846 of 2024, Shahida Perveen vs Secretary Education etc.

Respected Sir!

The undersigned is officially obliged to inform your good self on the subject mentioned above and to convey an untoward situation happened on 15th of June 2024, whereof, the Ex-DEO Female DIKhan, Mrs. Shahida Perveen, entered into office of the DEO (Female) DIKhan forcefully, in the pretext of the aforementioned order of the Honourable KP Tribunal and shouting that she has been restored as DEO Female DIKhan etc. and took unto possession of all the relevant official record from the dealing staff, such as the Diary/ Dispatch registers etc., and further enquired about the Official car of the DEO Female.

It is pertinent to mention that the said order of the Honourable Tribunal was misconceived and misinterpreted by the Predecessor of this office. In this connection, the Operative Para of the same order is reproduced as under:

2. Along with the appeal, there is an application for suspension of impugned order dated 10.05.2024. Notice of this be issued to respondents. In the meanwhile, operation of impugned order shall remain suspended, if not acted upon earlier.

It is further added that the undersigned has already assumed the charge of the post of DEO (Female) DIKhan on 11th of May 2024 vide office order No.SO(MC)/E&SED/4-16/2024/DEOs/D.I.Khan, dated 10.05.2024, with a copy endorsed to your good office as well; Salary of the undersigned has already been activated on the Official ID of the DEO (Female) DIKhan, since 11th of May 2024. (Annexure A).

Moreover, it is added that undersigned being DEO Female DIKhan, has attended in person the DB in the Honourable Peshawar High Court DIKhan Bench, on 03.06.2024 and 06.06.2024 in many cases in discharge of my official duties. Likewise, many official meetings convened by the District Administration and others line and allied departments regarding the issues of Education Department were graced by the undersigned in public service.

It is not out of place, to mention that the predecessor was initially placed at the Disposal of the Directorate vide the impugned order and later on posted as Director HR, *Elementary & Secondary Education Foundation (ESEF)* vide order No.SO(AB)E&SED/15-2/ESEF/2024, dated 12.06.2024, on deputation for the period of 3 years by the competent authority, knowing that undersigned has taken over charge and started official duties to the best of my abilities.

In view of the above, it is clear that the impugned order issued by the competent authority was implemented and complied in letter and spirit. Hence, the order of the Honourable Tribunal is not applicable to the extent of the undersigned because the same was already acted upon.

Therefore, it is requested that; the Ex-DEO, Mrs. Shahida Perveen may be advised to join her duties on her place of posting under the order No. SO(AB)E&SED/15-2/ESEF/2024, dated 12.06.2024, being a civil servant; and not to interfere in the smooth running of the official matters and assignments of this office so that the undersigned may continue my official responsibilities with peace of mind in the best interest of the government as well the public.

DISTRICT EDUCATION OFFICER
(FEMALE) DERA ISMAIL KHAN

Endst: No. _____

Dated D.I.Khan The. 15.06.2024

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

1. PS to Secretary, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. Deputy Commissioner DIKhan.
4. PA to DEO (Female), DIKhan.
5. Master file.

Section Officer (Management Cadre)
Elementary & Secondary Edu. Dept.
Govt. of Khyber Pakhtunkhwa

DISTRICT EDUCATION OFFICER
(FEMALE) DERA ISMAIL KHAN

ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

No. SO(MC/E&SED/1)-1/2023/DEO (F) DIK/Shahida Parveen
Dated: 21st June, 2024

The Directress,
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

Subject: **SPECIAL REPORT IN CONTEXT OF ORDER DATED 14.06.2024 IN SAE
B46 OF 2024, SHAHIDA PARVEEN VS SECRETARY EDUCATION ETC**

I am directed to refer to the subject noted above and enclose herewith copy of letter dated 15.06.2024 received from DEO (Female) D.I.Khan which is self-explanatory and to convey that the conduct of Mst. Shahida Parveen, Ex-DEO as reported by the DEO (Female) D.I.Khan through letter under reference is not only against the official norms but also inconsistent with the orders of the learned Service Tribunal dated 14.06.2024.

It is therefore, directed that Mst. Shahida Parveen Ex-DEO may be advised to refrain from any conduct contrary to the official norms and discipline, otherwise, the department will be constrained to initiate appropriate legal proceedings.

Encl: As Above:

SECTION OFFICER (Management Cadre)

Endst: Even No. & Date:

1. Director LSEI, Phase-7 Hayatabad, Peshawar
2. Deputy Commissioner D.I.Khan
3. Section Officer (AB) E&SE Peshawar
4. DEO (Female), D.I.Khan
5. PS to Secretary E&SED Khyber Pakhtunkhwa, Peshawar.


SECTION OFFICER (Management Cadre)