


FORM OF ORDER SHEET

Court of _____

Appeal No. 1438/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	09-Sep-24	<p>The appeal of Mr. Suhaila Hakeem today by Mr. Saifullah Mongol Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 24-Sep-24. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Service appeal NO. 1438 /2024

Mst. Suhaila Hakeem Appellant

VERSUS

Director (E & S) education & another Respondents

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Suhaila

Appellant

Through

S. Ullah

SAIF ULLAH MONGOL (CHITRALI)

ADVOCATE HIGH COURT

CHITRAL LAW CHAMBER AT SWAT,

OFFICE NO A-32, FIRST FLOOR SULTAN

TOWER, MAKANBAGHI MINGORA, SWAT

CONTACT # +92344-1040226./ +92333-8340226

saimongol@gmail.com

Dated 09/09/2024

(1)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Service appeal NO. 1438 /2024

Mst. Suhaila Hakim D/o Lal Hakim R/o Khevedad Khel, Tappa, Hassan
Khel, Mohallah Darwesh Bagh Sadda Tehsil Lower Kurram District
Kurram
.....(appellant)

VERSUS

1. Director Elementary & Secondary Education Khyber
Pakhtunkhwa office Firdos chowk GT road Peshawar.
2. District education officer DEO (Female) District kurram and office
at para chinar city upper kurram.

.....(Respondents)

**APPEAL UNDER SECTION-4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974
AGAINST THE IMPUGNED WITHDRAWAL /
CANELLATION OF APPOINTMENT ORDER DATED
24-10-2023 PASSED BY THE RESPONDENT NO. 2.**

PRAYER IN APPEAL: -

It is, therefore, humbly prayed that on acceptance of
the instant Service appeal the impugned withdrawal order
dated 24-10-2023 passed by the respondent No.2 may
kindly be declared illegal and be set aside and the
appellant may kindly be reinstated as Primary School
Teacher (PST-BPS-12) from 19-04-2022 with all back
benefits including seniority etc.

OR

Any other remedy which has not been specifically asked
for and deems fit by this Honourable Tribunal to the facts
and circumstances of the instant service appeal may also
be granted in favour of the appellant.

Respectfully Sheweth:

That appellant humbly submits under:

1. That appellant is bonafide and peaceful citizen of Islamic
republic of Pakistan and permanent resident of Caste
khoiyadkhel Tappa Hassan Khel Muhallah Darwesh Bagh Post

2

Office sadda Tehsil Sadda District Kurram. (Copy of CNIC is attached as annexure "A").

2. That the appellant belongs to an educated family and completed her master degree in the year 2014 with additional degree of bachelor of education (B'ED) (Copy of educational testimonials are attach as "B" to "B-9")
3. That the appellant initially appointed as primary School teacher (PST) (BPS-12) through order No. 1986-2002 /EDO dated 19-04-2022 by the respondent No.2, in response to that appointment letter the appellant took charge of the same after fulfilling all codal formalities on 19-04-2022 (Copy of appointment letter and charge report are attached as annexure "C"- "D")
4. That thereafter the appellant started her services from 19-04-2022 in government girls' primary school (GGPS) Pir Qayum No.2 against the vacant post initially for one year on probation period.
5. That after two months and 11 days of service rendered by the appellant in the ibid school and astonishingly the appellant received a corrigendum letter No.3175-87/ EDO on 30-06-2022 issued by the respondent No.2, through which the appellant transferred to government girls primary Hassanzai, while the respondent No.3 has been transferred from GGPS Hassanzai to GGPS Pir Qayum No.2 (Copy of corrigendum/Transfer order as attach as annexure "E").
6. That the appellant upon the illegal and unauthorized transfer order approached through an application to the respected office of respondent No. 2 for cancellation of the impugned transfer order dated 30-06-2022, however all efforts of the appellant went in vain. (Copies of applications are attached as annexure "F").
7. That the appellant against that transfer order filed service appeal No.1719/2020 before this Hon'ble tribunal, which was allowed in the following terms on 10th July 2023: -
““Mr. Muhammad shah, departmental representative present in the court stated that the appellant had not gone to the new place of posting. He further stated that the appellant might submit arrival report today which would be accordingly accepted. The learned counsel for the appellant submitted that being a lady, the appellant might be considered for a nearer posting in case of availability of post in future. The representative of the respondents submitted that

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on availability of a post nearer to the house of the appellant, she would be considered for her adjustment against that. Orders accordingly”.

(Copy of service Appeal No.1719/2020 and order dated 10-06-2023 are attached as annexure G&H)

8. That the appellant thereafter time and again visited to the learned respondent's office for taking charge in the transferee school, in this regard attested copies of the ibid order/judgment and application by mentioning all details of the case and order has been submitted/sent on 03/08/2023 via post office to the respondent no.2, but the respondents was delaying the matter in one and other pretext.

9. That the appellant again filed execution Petition No.799/2023 before the Hon'ble service tribunal, which was pending for implementation, on 17-11-2023 representative / focal person on behalf of respondent No.2 appeared before the Hon'ble tribunal and submitted/presented withdrawal order No.10717-19/Edu-F Apptt:ord:pst file dated 24/10/2023 of the appointment order of the appellant and handed over copy of the same to the appellant first time inside the court during execution proceeding on 17-11-2023.

(Copy of execution petition, order dated 17-11-2023 & withdrawal order dated 24-10-2023 are attached as annexure "I, J & K")

10. That the appellant feeling aggrieved filed departmental representation to respondent No.1 against the withdrawal order on 20-11-2023 through diary No.2905, after that the appellant time and again visited to the office of respondent No.1 for disposal of her departmental representation but with no result, in this regard application also has been forwarded. Hence the instant service appeal amongst other grounds.

(Copy of Departmental appeal and application are attached as annexure L & M)

GROUNDS:

- A. That the appellant is natural born bona fide citizen of Islamic republic of Pakistan and fully and equally entitled to all basis and fundamental rights as supported and guaranteed by the constitution of Islamic republic of Pakistan 1973, interpreted and discrimination along with unfettered exercise of discriminative powers by an authority or office is always been deplored and deprecated by the superior court.

(4)

- B. That the initial impugned transfer order and withdrawal order issued by the respondent No.2 are illegal, without authority and against the principle of civil services laws and rules.
- C. That the appellant is permanent resident of union council pir Qayum and also applied for the appointed post at the time of filing online application.
It is very important to mention here that the appellant got marriage in the year 2018 in sadda and have 1 kid, now joining in subsequent transfer school create hurdles and there is apparent apprehension of murder, because in hassanzai there is conflict between sunni and shia and most importantly the transfer school is situating 15 km distance from appellant house and there is no transport facility provided by the government.
- D. That the initial posting made on the basis of merit list and appointment letter, the respondent No. 3. on serial no.2 of the merit list having 108, 28 score and on her sweet will and wish decided to join GGPS Hassanzai, while the appellant was on serial No.9 of the appointment letter.
- E. That the initial impugned transfer order/letter dated 30-06-2022 is issued on political approach, while the appellant is belonging to a poor family and has no political approach. There is a lot of judgments of this honourable court as well the Apex court that transfer on political approach is illegal and is violation of article 27 of the Islamic republic of Pakistan, 1973, which provide the safeguard against discrimination in services.
- F. That the respondents didn't honour to the judgment passed by this Hon'ble tribunal in the appellant Favor on 10-06-2023, in non-compliance the appellant filed execution petition, during execution proceeding representative of respondent No.2 appeared and presented withdrawal order dated 24-10-2023 of the appellant, which is illegal and issued without authority.
- G. That the appellant has never violated any terms and condition of the appointment order, the appellant challenged pre-mature transfer order before this Hon'ble Tribunal in first round of litigation, which was her legal right.
- H. That the respondent No.1 has not responded to the Departmental representation of the appellant/applicant.

5-A

BEFORE THE KHYBER PAKHTUNKHWA SERVICE

TRIBUNAL PESHAWAR

Service appeal NO. _____ /2024

Mst. Suhaila Hakeem Appellant

VERSUS

Director (E & S) education & another Respondents

CERTIFICATE:

Certified on instructions of my client that appellant has not previously moved service appeal to this hon'ble court under section-4 of the khyber Pakhtunkhwa service tribunal act, 1974 against the impugned withdrawal order. further stated that being service appeal on the score that since there is no adequate and alternate legal remedy is available against the departmental representation.

SAIF ULLAH MONGOL

SAIF ULLAH MONGOL (CHITRALI)

ADVOCATE HIGH COURT

CHITRAL LAW CHAMBER AT SWAT,

OFFICE NO A-32, FIRST FLOOR SULTAN

TOWER, MAKANBAGH MINGORA, SWAT

CONTACT # +92344-1040226 / +92333-840226

saifmongol@gmail.com



9-9-2024

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Service appeal NO. _____/2024

Mst. Suhaila Hakeem Appellant

VERSUS

Director (E & S) education & another Respondents

AFFIDAVIT

I, Suhaila Hakim D/o Lal Hakim R/o Khevedad Khel, Tappa, Hassan Khel, Mohallah Darwesh Bagh Sadda Tehsil Lower Kurram District Kurram, do hereby solemnly affirm and declare that the contents of the Service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

Suhaila

DEPONENT

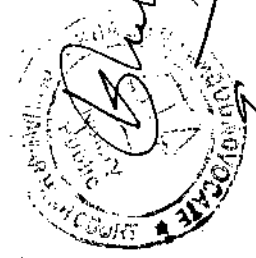
CNIC: 21301-1942834-2

Cell: 0302-8352106

Identified by

Saif Ullah Mongol
Advocate High Court

Saif Ullah Mongol

Suhaila
9-11


7

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Service appeal NO. _____/2024

Mst. Suhaila Hakeem Appellant

V E R S U S

Director (E & S) education & another Respondents

ADDRESSES OF PARTIES

APPELLANT:

Mst. Suhaila Hakeem D/o Lal Hakeem R/o Khevedad Khel, Tappa,
Hassan Khel, Mohallah Darwesh Bagh Sadda Tehsil Lower Kurram
District Kurram.

RESPONDENTS:

1. Director Elementary & Secondary Education Khyber
Pakhtunkhwa office Firdos chowk GT road Peshawar.
2. District education officer DEO (Female) District kurram and office
at para chinar city upper kurram.

Suhaila

Appellant

Through

S. Saif Ullah

SAIF ULLAH MONGOL (CHITRALI)

ADVOCATE HIGH COURT

CHITRAL LAW CHAMBER AT SWAT,

OFFICE NO A-32, FIRST FLOOR SULTAN

TOWER, MAKANBAGH MINGORA, SWAT

CONTACT # +92344-1040226 / +92333-8340226

saimongol@gmail.com

Date: 09/09/2024



8

Amir
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A



حکومت پاکستان

2-2834-1942-2002



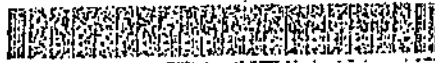
01/01/1989



XZ7P1B 21302-1942834-2



31/07/2019 02/09/2009



MA

Attended to the
Public Copy



g-h-w

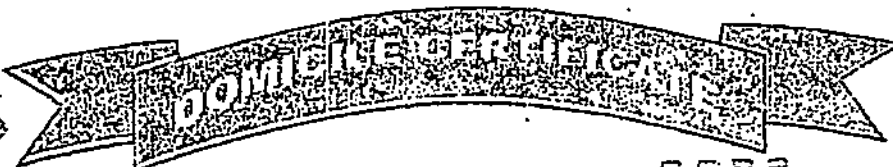
9

NO. 1785 /AG

DATED PARACHINAR THE 19/7/62

OFFICE OF THE POLITICAL AGENT KURRAM AGENCY

Annexure
"B"



CERTIFIED THAT MR/MRS

Mrs. Gulistan

SON/DAUGHTER OF MR

LAL NARAYAN

BELONGS TO A

RECOGNIZED TRIBE OF

Barikhat

SECTION

Kurram Agency

SUB SECTION

Barikhat

AND HIS/HER FATHER IS/WAS A PERMANENT

BONAFIDE RESIDENT OF VILLAGE

Sadul

KURRAM AGENCY

HE/SHE IS AN ELIGIBLE CANDIDATE TO AVAIL HIMSELF/HERSELF OF THE SEAT RESERVED

FOR TRIBAL AREAS KOHAT DIVISION KOHAT BACK AREA KURRAM AGENCY

M. KURRAM REALIZI
Political Agent
Lower Kurram Agency

ASSISTANT

POLITICAL AGENT

ATTACHED
POLITICAL AGENT
KURRAM AGENCY

OFFICE SEAL



10

S.No. KBGG 5265

Roll No. 52054

Annexure
"B1"

Board of Intermediate & Secondary Education
KOHAT



DETAILED MARKS CERTIFICATE
Secondary School Certificate Examination
Session 200 1 (Annual/Supplementary)
(GENERAL GROUP)

Name: Suhaila Hakoon

Father's Name: Lal Hakoon Roll No. 51084

SUBJECT	Marks Allotted						Marks Obtained						
	9 th			10 th			In Figures						In Words
	Theo	Pract	Total Marks	Theo	Pract	Total Marks	9 th		10 th		Total Marks		
1. English	75	-	75	75	-	150						92	
2. Urdu	75	-	75	75	-	150						104	
3. Islamic Education	75	-	75	-	-	75						56	
4. Pakistan Studies	-	-	-	75	-	75						41	
5. Mathematics	75	-	75	75	-	150						95	
6. General Science	75	-	75	75	-	150						64	
7. F.H.E.	75	-	75	75	-	150						92	
8. /s	75	-	75	75	-	150						106	
Total	525	-	525	525	-	1050						658 13	

Note: (i) figures in bold are corrected. (ii) '0' means no response in the subject. (iii) Total marks are corrected only in the table.

General Remarks: The Candidate has failed/passed and placed in Grade -
Six and Eighty Eight

Date 15/6/01

Controller of Examinations
BISE KOHAT



Signature of Controller of Examinations

S.No. KB 38526

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Roll No. 52084

BOARD OF INTERMEDIATE & SECONDARY EDUCATION
KOHAT
(N.W.F.P. Pakistan)

Secondary School Certificate Examination
SESSION: 2005 - ANNUAL

THIS IS TO CERTIFY THAT Suhaila Hakeem
 Son/Daughter of Lal Hakeem and a
 student of Govt Girls High School Saida Kurram Agency has passed
 the *Secondary School Certificate Examination* of the Board of Intermediate and
 Secondary Education, Kohat held in March, 2005 as a Regular
 candidate. He/She obtained 688 Marks out of 1050 and has been placed in
 Grade B-1 Representing Very Good.

The Candidate passed in the following subjects:

- | | | | |
|----------------|--------------------|--------------------|-----------------|
| 1. English | 2. Urdu | 3. Islamiyat | 4. Pak. Studies |
| 5. Mathematics | 6. General Science | 7. Islamic Studies | 8. EHE |

Date of birth according to admission form is 08-Jan-1989

[Signature]
 Asstt. Secretary

[Signature]
 Secretary

This Certificate is issued without alteration or erasure.



Annexure
 "B2"

9-9-14

S No KB 44770

12

BOARD OF INTERMEDIATE & SECONDARY EDUCATION

KOHAT

DETAILED MARKS CERTIFICATE
Higher Secondary School Certificate Examination

Annexure
"B3"

HUMANITIES (Part-II)
SESSION 2007 (ANNUAL) Roll No: 42307

Name SUHAILA HAKEEM Father's Name LAL HAKEEM

Institution/District : Govt Girls Degree College Sadda Kurrani Agency

Subjects	Marks	Marks Obtained				Total	Marks in Words
		Part-I		Part-II			
		Theory	Pract	Theory	Pract		
English	200	47	--	25	--	66	Sixty-Six
Urdu	200	57	--	61	--	118	One Hundred Eighteen
Islamic Education	50	43	--	--	--	43	Forty-Three
Pakistan Studies	50	--	--	29	--	29	Twenty-Nine
Civics	200	65	--	75	--	140	One Hundred Forty Only
Outline Of Home Economics	200	58	15	39	15	129	One Hundred Twenty-Nine
Islamic Studies	200	65	--	76	--	141	One Hundred Forty-One
Total : 1100						666	Six Hundred Sixty-Six Only

Note: Errors / Omissions excepted.
Date : 10-08-2007
Computer Cell BISE, Kohat
(J&A)

Remarks :
Checked by :
Controller



13

S.No. KB 13714

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

Roll No. 42307

Annexure
"B4"

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



KOHAT
(N.W.F.P. Pakistan)
INTERMEDIATE EXAMINATION
HUMANITIES GROUP
Session 2007 (Annual)

This is to Certify that Suhaila Hakeem

son/Daughter of Lal Hakeem

and a student of Govt Girls Degree College Sadda Kurram Agency

Registered No. 025-BK/GCSKA-2005 has passed the Intermediate Examination of the Board of Intermediate & Secondary Education, Kohat held in May, 2007

as a Regular candidate. He/She obtained 666 marks out of 1100 and has been placed in B Grade Representing Very Good

The Examination was taken as a whole / in parts.

[Signature]
Asstt. Secretary

[Signature]
Secretary

This certificate is issued without alteration or abridgement.



9-9-2007

Serial No. 024016



Kohat University of Science & Technology, Kohat (Pakistan)

DETAILED MARKS CERTIFICATE

Bachelor of Arts (B.A.) Part II Annual Examination, 2009

Name: Sohalla Hakeem

Roll No: 13352

Father's Name: Lal Hakeem

Registration No. 2007-SKG-14

Certified that the candidate secured the following marks and is placed in 1st Division

S U B J E C T S	Maximum Marks	M A R K S O F B O T H A R T I C L E D I S C O N T I N U E D	
		In Figure	In Words
English Compulsory	75	32	Thirty Two
Islamic Studies	75	64	Fifty Four
Urdu	75	42	Forty Two
Pak Studies	40	29	Twenty Nine
Part-I Marks	285	185	One Hundred Eighty Five
Total	550	342	Three Hundred Forty Two

The examination was taken as a whole

To Pass 40% Marks in each Subject (Written & Practical) Separately & 45% Marks in Aggregate

Result declared on 24-Oct-09

Tab

ATTACHED
ADMISSION
CONTROLLER OF EXAMINATIONS
Kohat University of Science and Technology
Kohat, Pakistan

Errors and omissions are subject to subsequent rectification.



Amjad
86

Serial No. 007072

Roll No. 13352

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Registration No.
2007-SKG-11

Kohat University of Science & Technology, Kohat (Pakistan)

Session 2007-2009

SUHAILA HANEM DAUGHTER OF LAL HANEM
GOVT. GIRLS DEGREE COLLEGE SADDA

of _____ having passed the prescribed examination held in _____ and a student _____, is this day admitted by _____

(S)

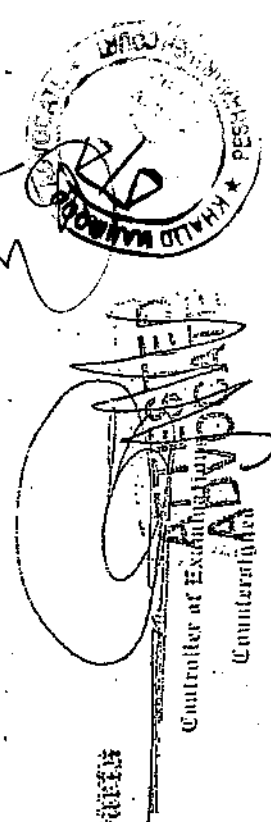
The Kohat University of Science & Technology, Kohat
in the Degree of

Bachelor of Arts

in the FIRST Division

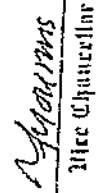
The Examination was taken as a whole / in parts

m-b-b


Controller of Examinations
Counter signed

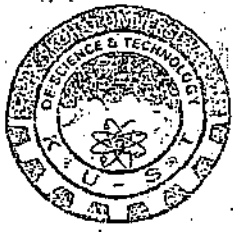


Result declared on OCTOBER 24, 2009


Vice-Chancellor

16

Serial No. 238217



Kohat University of Science & Technology, Kohat (Pakistan)

« Annexure »
« B7 »

DETAILED MARKS CERTIFICATE

Master of Arts (Urdu) Final Annual Examination,
2012

Name: Sohaila Hakeem
Father's Name: Lal Hakeem

Roll No. 16909
Registration No. 2007-SKG-11

Certified that the candidate secured the following marks and is placed in 2nd Division

S U B J E C T S	Maximum Marks	M A R K S O B T A I N E D	
		In Figure	In Words
Poetry "Nazam" (VI)	100	54	Fifty Four
Ghazal Masnavi & Marsi (VII)	100	40	Forty
iqbalyat (VIII)	100	40	Forty
Criticism (IX)	100	48	Forty Eight
Essay / Mass Communication (X)	100	44	Forty Four
Miva	100	44	Forty Four
Previous Marks:	500	227	Two Hundred Twenty Seven
Total	1100	497	Four Hundred Ninety Seven

The examination was taken as a whole

Result declared on 11-Jan-13

CONTROLLER OF EXAMINATIONS
Kohat University of Science and Technology
Kohat, Pakistan.

Errors and omissions are subject to subsequent rectification.

ATTESTED
ADVOCATE



Handwritten signature and scribbles

Signature "BB"

Serial No. 008864
Roll No. 16909

بیت دانش و تحقیق

Registration No. 207-SK-11

Kohat University of Science & Technology, Kohat (Pakistan)

Session ANNA 2012

SUBHA HAQUEE DAUGHTER OF LAL HAQUEE

KORAM AGENCY

and a student

of KORAM AGENCY examination held in SEPTEMBER 2012

having passed the prescribed examination held on 20/12, is this day admitted by

The Kohat University of Science & Technology, Kohat

to the Degree of

Master of Arts

in the SCIENCE Division

The Subject of examination being PHYSICS

The Examination was taken as a whole / in parts

Result declared on JANUARY 11, 2013



[Signature]

Controller of Examinations

Countersigned

[Signature]

Vice-Chancellor



[Handwritten marks]

17

Serial No. 0927939

18

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD
TRANSCRIPT

Sexual No 723642

Roll No. AJ6004

AJ6004

Name SOHAILA HAKEEM

Registration No. 11AKM00015

11AKM00015

Father's Name LAL HAKEEM

Final Semester SFR-2015

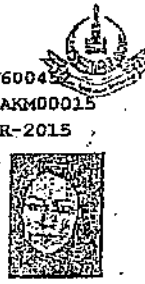
SFR-2015

Address MUHAMMAD JAVID STATIONARY BANGASH MARKET
SADRA

Tehsil SADEA LOWER KURRAM

District KORRAM AGENCY

has successfully completed BACHELOR OF EDUCATION (B.ED)



Annexure
"B9"

The detail of passed courses is as under

Semester	Course Code	Title of Courses	Marks	
			Maximum	Obtained
AUT- 11	0513	SCHOOL ORGANIZATION	100	65
SPK- 11	0514	EVALUATION, GUIDANCE & RESEARCH	100	63
SPH- 11	0518	EDUCATIONAL PSYCHOLOGY	100	64
AUT- 11	0651	ENGLISH (COMPULSORY)	100	54
SFR- 12	0512	PERSPECTIVE OF EDUCATION	100	55
SPK- 12	0652	ISLAM, PAKISTAN AND MODERN WORLD	100	69
SPR- 12	0655	WORKSHOP	100	61
SPR- 15	0517	TEACHING OF PAKISTAN STUDIES	100	57
AUT- 11	0654	ISLAMIAT AND ITS TEACHING	100	59

Total Credits 6 Total Marks/Obtained 900 / 547
 Result Declared on January 14, 2016 Percentage/Grade 61 / B
 Date of Issue December 13 2021

Stamp: RECEIVED

Signature of Controller of Examinations

Disclaimer: This result card/transcript is issued provisionally, errors and omissions excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.



9-9-2

M

1. The report should be submitted to all concerned in duplicate.
 2. The appointment is purely made on temporary basis initially for one year.
 3. They should not be handed over charge, if they do not fulfill the recruitment criteria.
 4. Their appointment is subject to the condition that the Educational & Professional certificates/documents must be verified from the concerned issuing authorities. If they fail to produce the certificates/documents, their services will be terminated and reported to the Law Enforcement Agencies for further action.
 5. Their services will be terminated at any time, in case their performance found unsatisfactory during the probation period.
 6. In case they want to resign their post, they will have to give one month prior notice or forfeit one month pay in lieu thereof.
 7. Their salaries will not be drawn until or unless their academic/professional certificates/documents are not verified from concerned issuing authorities.
 8. They should join their posts within 15 days of the issuance of this notification, in case of failure, their appointment will automatically be considered as cancelled.
 9. They are directed to provide their medical certificates from the Medical Superintendent concerned before reporting over charge.
 10. They will be governed by such other regulations as may be issued from time to time by the Government.

Ms. P. P. ...

TERMS & CONDITIONS

S. No.	Name	Father's Name	Score	Name of School	Remarks
1	Subha Hameem	Lat Hameem	93.72	GGPS Pit Dayam No. 2	A.V. Post
2	Zain Khan	Muhammad Khan	93.97	GGPS Muhammad Ahsan	A.V. Post
3	Mir Alam Khan	Mir Alam Khan	98.80	GGPS Shikhandram	A.V. Post
4	Mir Zaman	Mir Zaman	99.56	GGPS Simgane	A.V. Post
5	Noor Hussain	Noor Hussain	100.79	GGPS Sm Chirga	A.V. Post
6	Trar Hussain	Trar Hussain	100.95	GGPS Ishimital	A.V. Post
7	Trar Hussain	Trar Hussain	107.73	GGPS Targal	A.V. Post
8	Muhammad Umar	Muhammad Umar	108.28	GGPS Harnathi	A.V. Post
9	Nolo Hussain	Nolo Hussain	103.07	GGPS Dyanthi	A.V. Post

1. The appointment is purely made on temporary basis initially for one year.
 2. They should not be handed over charge, if they do not fulfill the recruitment criteria.
 3. Their appointment is subject to the condition that the Educational & Professional certificates/documents must be verified from the concerned issuing authorities. If they fail to produce the certificates/documents, their services will be terminated and reported to the Law Enforcement Agencies for further action.
 4. Their services will be terminated at any time, in case their performance found unsatisfactory during the probation period.
 5. In case they want to resign their post, they will have to give one month prior notice or forfeit one month pay in lieu thereof.
 6. Their salaries will not be drawn until or unless their academic/professional certificates/documents are not verified from concerned issuing authorities.
 7. They should join their posts within 15 days of the issuance of this notification, in case of failure, their appointment will automatically be considered as cancelled.
 8. They are directed to provide their medical certificates from the Medical Superintendent concerned before reporting over charge.
 9. They will be governed by such other regulations as may be issued from time to time by the Government.

APPOINTMENT

Office of the District Education Officer
 District Education Office
 District Education Office



10

Amexre

90

11. In case of any discrepancy in documents, oversight or clerical mistake, the Competent Authority has the right to withdraw appointment order.


12. If any candidate appointed with fake documents/few score erroneously, his appointment will be withdrawn.

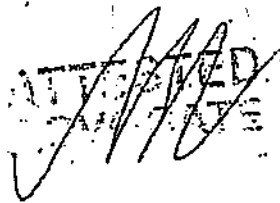
(Sultan Muhammad)
District Education Officer
District Kurram

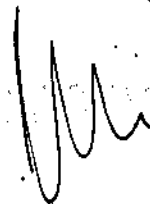
No. 1786-7602 /Edu Dated 19/4 /2022

Copy forwarded to the:-

1. Director Elementary & Secondary Education K.P Peshawar.
2. Deputy Commissioner District Kurram.
3. District Accounts Officer Kurram.
4. District Monitoring Officer (EMA) Kurram.
5. Dy:DEO (Female) Lower/Central Kurram.
6. Head Teachers concerned.
7. Accountant Local Office at Sadda.
8. Candidates concerned.
9. Office file.


District Education Officer
District Kurram





91

Annexure
"D"

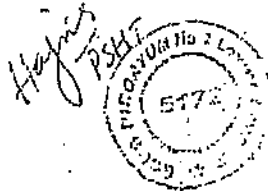
CHARGE REPORT

1. Miss Sohaila Hakeem D/O La Hakeem in compliance with the District Education Officer Kurram Endst No 1986-7002 Dated 19/04/2022 took over charge as PST post at GHS/GMS/GPS Pir Qayum today on 19/04/2022 forenoon/afternoon.

Took Over

Miss. SOHAILA HAKEEM

HM/Head Teacher



Copy forwarded to:-

- 1:- District Education Officer Kurram at Parachinar.
- 2:- Deputy District Education Lower & Central Kurram.
- 3:- SDEO/ADEO concerned
- 4:- Candidate Concerned.
- 5:- Office file.

Approved by
True Copy

93

Annexure
REF



OFFICE OF THE DEPUTY DISTRICT EDUCATION OFFICER,
(FEMALE) LOWER & CENTRAL KURRAM, SADDA.
No. _____ /Edu Dated _____ 2022
E-mail deputydeofemalesadda@gmail.com

CORRIGENDUM

Consequent upon the direction of Director Education Elementary & Secondary Education KPK Peshawar partial modification in this office Enlist No 1986-2002 dated 19/04/22.

SN.	NAME OF THE OFFICIAL	FATHER	FROM	TO
1	Hiba Zaka	Muhammed Umar	GGPS Hassanzal	GGPS Pirqayum No.2
2	Sahida Hakim	Lal Hakim	GGPS Pirqayum No.2	GGPS Hassanzal

Note: Charge report should be submitted to all concern.

Dy. District Education Officer,
(F) Lower & Central Kurram, Soddla.

Enlist No. 3175-78 /Edu Dated 30 / 06 2022

Copy forwarded to the:

- Director Education Elementary & Secondary Education KPK Peshawar.
- District Education Officer Lower and Central Kurram.
- ASDEO Lower Kurram.
- Teacher concern.

(Signature)
Dy. District Education Officer,
(F) Lower & Central Kurram, Soddla.

(Signature)

(23)

Annexure
"F"

To,

The District Education Officer
(Female) Parachinar upper Kurram D.K.

Subject: APPLICATION FOR CANCELLATION OF IMPUGNED TRANSFER
ORDER DATED: 30-06-2022.

Respectfully Sir/ Madam.

That the applicant humbly submits as under.

1. That the applicant is bona fide resident of Sadda Lower Kurram District Kurram.
2. That the applicant is appointed as PST teacher in the GGPS Pir Qayum No.2 Lower Kurram since 19-04-2022. (appointment letter is attached)
3. That the applicant took charge on dated: 19-04-2022 in GGPS Pir Qayum No.2 Lower Kurram but later on through corrigendum order dated: 30-06-2022 the applicant is transferred from GGPS Pir Qayum No.2 to GGPS Hassanzai. (copy of the charge sheet and order are attached)
4. That the impugned transfer order has been issued recently while the applicant is serving probation period.
5. That the applicant belongs to a poor family and a married woman having a baby aged only 14 to 15 months and the GGPS Hassanzai is far away so it will affect the life of my baby and I will not be able to care of my baby.
6. That the order of transfer is against the law and the policy of education.

It is therefore humbly requested to you the order Dated: 30-06-2022 may kindly be cancelled for the welfare of the society as well as for the family of the applicant.

Dated: 04/08/22

ATTACHED

Applicant

Suhaila Hakim

Suhaila

ATTACHED

24

To,

The Deputy District Education Officer
(Female) Lower and Central Kurram Sadda

Subject: APPLICATION FOR CANCELLATION OF IMPUGNED TRANSFER
ORDER DATED: 30-06-2022.

Respectfully Sir/ Madam.

That the applicant humbly submits as under.

1. That the applicant is bona fide resident of Sadda Lower Kurram District Kurram
2. That the applicant is appointed as PST teacher in the GGPS Pir Qayum No.2 Lower Kurram since 19-04-2022. (appointment letter is attached)
3. That the applicant took charge on dated: 19-04-2022 in GGPS Pir Qayum No.2 Lower Kurram but later on through corrigendum order dated: 30-06-2022 the applicant is transferred from GGPS Pir Qayum No.2 to GGPS Hassanzai. (copy of the charge sheet and order are attached)
4. That the impugned transfer order has been issued recently while the applicant is serving probation period.
5. That the applicant belongs to a poor family and a married woman having a baby aged only 14 to 15 months and the GGPS Hassanzai is far away so it will affect the life of my baby and I will not be able to care of my baby.
6. That the order of transfer is against the law and the policy of education.

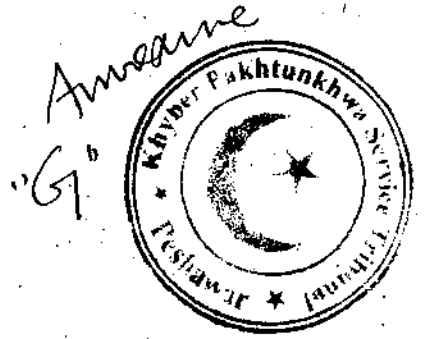
It is therefore humbly requested to you the order Dated: 30-06-2022 may kindly be cancelled for the welfare of the society as well as for the family of the applicant.

Dated: 04/08/2022

Applicant

Sahila Hakim

(25)



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service appeal No. 1719 /2022

Mst. Suhaila Hakim D/o Lal Hakim R/o Khevedad Khel, Tappa, Hassan Khel,
Mohallah Darwesh Bagh Sadda Tehsil Lower Kurram District Kurram.

.....APPELLANT

VERSUS

1. Government of KPK, through secretary elementary and secondary education Khyber Pakhtunkhwa Peshawar office at Civil Secretariat near MPA Hostel, Peshawar.
2. District education officer DEO (Female) District kurram and office at para chinar city upper kurram.
3. District education officer DEO (Male) District Kurram office at Para Chinar City Uppar Kuram .
4. Deputy District education officer DDEO (Female) lower and central kurram office at sadda Colony lower Kurram.
5. Bibi Zakia D/o Muhammad Umer R/o Central Kurram Tehsil Sadda District Kurram.

.....Respondents

**APPEAL UNDER SECTION-4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974
AGAINST THE IMPUGNED TRANSFER ORDER /
NOTIFICATION DATED 30-06-2022, PASSED BY
RESPONDENT NO. 4.**

Respectfully Sheweth:

That appellat humbly submits under:

1. That the appellat is bonafide and peaceful citizen of Islamic republic of Pakistan and permanent resident of Caste khoiyadkhel Tappa Hassan Khel Muhallah Darwesh Bagh Post Office sadda Tehsil Sadda District Kurram. (Copy of CNIC is attached as annexure "A").
2. That the appellat belongs to an educated family and completed her master degree in the year 2014 with additional degree of bachelor of education (B'ED) (Copy of educational testimonials are attach as "B" to "B-9")
3. That the appellat appointed as primary School teacher (PST) (BPS-12) through order No. 1986-2002 /EDO dated 19-04-2022 by the respondent No.3, in response to that appointment letter the appellat took charge of the same after fulfilling all cadal formalities on 19-04-2022 (Copy of

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

(26)

appointment letter and charge report are attached as annexure "C"-
"D")

4. That thereafter the appellant started her services from 19-04-2022 in government girl's primary school (GGPS) Pir qayam No.2 against the vacant post initially for one year on probation period.
5. That after two months and 11 days of service rendered by the appellant in the ibid school and astonishingly the appellant received a corrigendum letter No.3175-87/ EDO on 30-06-2022 issued by the respondent No.4, through which the appellant transferred to government girls primary Hassanzai, while the respondent No.5 has been transferred from GGPS Hassanzai to GGPS Pir Qayum No.2 (Copy of corrigendum/Transfer order as attach as annexure "E")
6. That the appellant upon the illegal and unauthorized transfer order approached through an application to the respected office of respondent No.1 and 3 for cancellation of the impugned transfer order dated 30-06-2022, however all efforts of the appellant went in vain. (Copy of application are attached as annexure "F & "G")
7. That seriously aggrieved with the inaction upon the application of the appellant, hushed and tight zip act of the respondents department, the appellant has no efficacious remedy except to approach this Hon'ble tribunal in service appeal amongst the following grounds.

GRUNDS:

- A. That the appellant is natural born bona fide citizen of Islamic republic of Pakistan and fully and equally entitled to all basis and fundamental rights as supported and guaranteed by the constitution of Islamic republic of Pakistan 1973, interpreted and discrimination along with unfettered exercise of discriminative powers by an authority or office is always been deplored and deprecated by the superior court.
- B. That the impugned transfer order issued by the respondent No.4 is illegal, without authority and against the principle of civil services laws and rules.
- C. That the appellant is permanent resident of union council pir qayyum and also applied for the appointed post at the time of filing online application.
It is very important to mention here that the appellant got marriage in the year 2018 in sadda and have 1 kid, now joining in subsequent transfer school create hurdles and there is apparent apprehension of murder, because in hassanzai there is conflict between sunni and shia and most importantly the transfer school is situate 15 km distance from appellant house and there is no transport facility provided by the government.
- D. That the initial posting made on the basis of merit list and appointment latter, the respondent No. 5. on serial no.2 of the merit list having 108, 28 score and on her sweet will and wish decided to join GGPS Hassanzai, while the appellant were on serial No.9 of the appointment letter.

ATTESTED
[Signature]
EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

27

- E. That the impugned transfer order/letter is issued on political approach, while the appellant is belong to a poor family and has no political approach. There is a lot of judgments of this honourable court as well the Apex court that transfer on political approach is illegal and violation of article 27 of the Islamic republic of Pakistan, 1973, which provide the safeguard against discrimination in services.
- F. That the appellant craves leave of this honourable court to submit additional documents as per need and to raise further points at the time of arguments.

It is, therefore, humbly prayed that on acceptance of this Service appeal the impugned transfer order No.3175-78 dated 30-06-2022 may kindly be declared illegal, unlawful, passed without authority and resultantly the appellant may kindly be ordered to remain and to continue her services on her initial appointed station i.e GGPS pir qayyum No.2.

Any other remedy which deems fit by this Honourable Court may also be granted in favour of appellant.

CERTIFICATE:

Certified on instructions of my client that appellant has not previously moved this Hon'ble court under section-4 of the Khyber Pakhtunkhwa service tribunal act, 1974 regarding the instant matter. Further stated that being service appeal on the score that since there is no adequate and alternate legal remedy is available or previously avail or approach lower forum, thus this case may be fixed before this honourable court.

ADVOCATE

Shila
appellant

Saif Ullah Mangol
Advocate High Court &
Federal Shariat Court of Pakistan

Through

Saif Ullah Mangol
Advocate High Court &
Saif Ullah Mangol
Advocate, High Court

Date: 28/11/2022

ATTESTED
[Signature]
EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

28

Annexure
"H"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No. 1719/2022

Titled "Suhaila Hakeem-vs-Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar and others"




ORDER

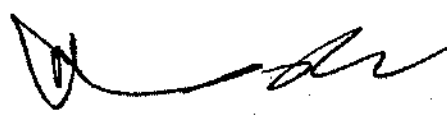
10th July, 2023


KALIM ARSHAD KHAN, CHAIRMAN: Learned counsel for the appellant present. Mr. Muhammad Jan, District Attorney alongwith Mr. Muhammad Shah, ADEO for the respondents present.

02. During the course of arguments, the learned counsel for the appellant alleged that the District Education Officer (Female), District Kurram was not allowing the appellant to assume charge even at the new station that is Government Primary School, Hassan Zai, Lower Kurram. Mr. Muhammad Shah, departmental representative present in the court stated that the appellant had not gone to the new place of posting. He further stated that the appellant might submit arrival report today which would be accordingly accepted. The learned counsel for the appellant submitted that being a lady, the appellant might be considered for a nearer posting in case of availability of post in future. The representative of the respondents submitted that on availability of a post nearer to the house of the appellant, she would be considered for her adjustment against that. Orders accordingly. Consign.

03. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal on this 10th day of July, 2023.*


(Farzana Paul)
Member (Executive)


(Kalim Arshad Khan)
Chairman

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Adnan Shah

Annexure
I



(29)

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Execution Petition No. 799 /2023

In

Service Appeal No.1719/2022

Khyber Pakhtunkhwa
Service Tribunal

Disty No. 8617

Dated 26-10-2023

Mst. Suhaila Hakim D/o Lal Hakim R/o Khevedad Khel, Tappa, Hassan Khel,
Mohallah Darwesh Bagh Sadda Tehsil Lower Kurram District Kurram.

.....Appellant

VERSUS

1. Government of KPK, through secretary elementary and secondary education Khyber pakhtunkhwa Peshawar office at Civil Secretariat near MPA Hostel, Peshawar.
2. District education officer DEO (Female) District kurram, office at para chinar city upper kurram.
3. District education officer DEO (Male) District Kurram office at Para Chinar City Uppar Kuram .
4. Deputy District education officer DDEO (Female) lower and central kurram office at sadda Colony lower Kurram.

..... Respondents

APPLICATION FOR IMPLEMENTATION/EXECUTION OF THE ORDER/ JUDGMENT DATED 10/07/2023 OF THIS HONOURABLE TRIBUNAL IN THE ABOVE TITLED SERVICE APPEAL.

Respectfully Sheweth:

That petitioner humbly submits under:

1. That the above titled service appeal was decided in Appellant's favour vide order/judgment dated 10/07/2023. (Copy of ibid judgment/order is attached as annexure "A").
2. That this Honourable Tribunal give direction to the respondents, which is reproduced as under:-

"Mr. Muhammad shah, departmental representative present in the court stated that the appellant had not gone to the new place of posting. He

ATTESTED

[Signature]
EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

further stated that the appellant might submit arrival report today which would be accordingly accepted. The learned counsel for the appellant submitted that being a lady, the appellant might be considered for a nearer posting in case of availability of post in future. The representative of the respondents submitted that on availability of a post nearer to the house of the appellant, she would be considered for her adjustment against that. Orders accordingly."

- 3. That the appellant thereafter time and again visited to the learned respondents office for taking charge in the transferee school, in this regard attested copies of the ibid order/judgment and application by mentioning all details of the case and order has been submitted/sent on 03/08/2023 via post office to the respondent no.2, but the respondents delaying the matter in one and other pretext.(Copy of application and receipts are attached as annexure "B")
- 4. That the respondents have not taken any action of the judgment/order of this Honourable Tribunal till date and all efforts of the appellant went in vain.

It is, therefore, humbly prayed that on acceptance of the instant application/petition the respondents may kindly be directed to implement the order/judgment of this Honourable Tribunal dated 10/07/2023.

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

Appellant *Shaila*

Through *Saif Ullah Mongol*

Saif Ullah Mongol
Advocate, High Court

Date: 25/10/2023

ATTESTED

[Signature]

EXAMINER
Kashmir Palitokhwa
Service Tribunal
Muzaffargarh

31

Ameera "T"

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR



Execution Petition No. 799/2023

Date of institution 26.10.2023

Mst. Suhaila Hakim D/o Lal Hakim, R/o Khevedad Khel, Tappa, Hassan Khel, Mohallah Darwesh Bagh Sadda Tehsil Lower Kurram District Kurram.

VERSUS

District Education Officer DEO (Female) District Kurram, Office at Parachinar City Upper Kurram.

ORDER
17.11.2023

Petitioner alongwith her counsel namely Saif Ullah Mongol, Advocate present. Mr. Toof Marjan, Focal Person alongwith Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present and produced copy of withdrawal order bearing No. 10717-19/Edu-F Apptt; ord;post file dated 24.10.2023 whereby appointment order of the petitioner has been withdrawn.

Copy of the same handed over to learned counsel for the petitioner, who stated that the petitioner was unaware of the order so produced by representative of the respondents today and will avail legal remedy against the same. He further stated that as further proceedings in the instant Execution Petition would not yield any fruitful result, therefore, he does not want to press the same. In this respect, signature of learned counsel for the petitioner obtained at margin of order sheet.

In view of the above, the Execution Petition in hand stands filed being not pressed. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
17.11.2023

(SALAH-UD-DIN)
MEMBER (JUDICIAL)

ATTESTED
EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar
29/11/23

Naeem Amin

Saif Ullah Mongol AHC
as filer

Annexure

"K"

(32)




**OFFICE OF THE DISTRICT EDUCATION OFFICER
FEMALE KURRAM**

No.10717-19/Edu-F Appt; ord;pal file Dated:-24/10/2023
Email:- deefskurram110@gmail.com



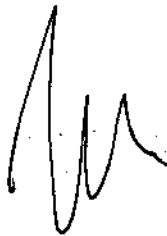
WITHDRAWAL OF APPOINTMENT ORDER:-

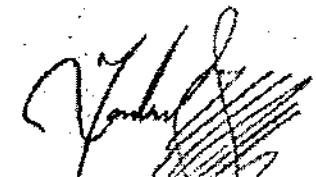
Consequence upon the report vide No.213-14/SDEO/F/LK Dated, 20/10/2023 report regarding Miss.Sohaila Hakim PST BPS-12, the appointment order vide Endst.No.1986-2002/Edu Dated, 19/4/2022 & Candidate Serial No. 9, Namely, Miss.Sohaila Hakim PST BPS-12 GGPS Hassanzai Lower Kurram is hereby withdrawn with immediate effect as she is not full filled terms & Conditions as mentioned in her appointment order vide serial No.05 & serial No.8. So, her appointment order is automatically considered withdrawn as per policy.


District Education Officer
(Female) Kurram

Copy is forwarded to :-

1. The Secretary E & S E KPK Peshawar.
2. The Additional Director NMDs Peshawar
3. The DDEO(F) L & C Kurram at Sadda.
4. The SDEO (F) Lower Kurram.
5. The DMO Kurram.
6. The DAO Kurram.
7. Master File.




District Education Officer
(Female) Kurram

Ammeane
"L"

(33)

BEFORE THE RESPECTED DIRECTOR ELEMENTARY AND
SECONDARY EDUCATION DEPARTMENT KHYBER PAKHTUNKHWA
PESHAWAR

DEPARTMENTAL APPEAL ON BEHALF OF APPLICANT/ APPELLANT AGAINST
THE WITHDRAWAL OF APPOINTMENT ORDER OF THE APPELLANT DATED 24-
10-2023 ISSUED BY THE DISTRICT EDUCATION OFFICER (FEMALE) KURRAM.

Respectfully Sheweth;

That the Applicant/ Appellant submit as under;

1. That the Appellant appointed as primary School teacher (PST) (BPS-12) through order No. 1986-2002 /EDO dated 19-04-2022 by the District Education Officer.
2. That through corrigendum letter the Appellant on 30-06-2022 has transferred from GGPS Pir Qayum No.2 to GGPS Hassanzai.
3. That the Appellant has challenged the transfer order by filing Departmental Representation and finally service appeal No.1719/2020 has been filed by the Appellant against the transfer order before the Honourable KP Service Tribunal, Peshawar, that has been admitted by the chairman Service tribunal through order dated 10 July 2023 and the appellant was directed to submit arrival report in GGPS Hassanzai, after the ibid order of the tribunal the Appellant/Applicant approach to the learned Office of DEO (Female) Kurram, SDEO Office and GGPS Hassanzai etc for submission of arrival report, in this regard by hand application as well as application though Post Office has been forwarded to the concerns for issuance of arrival report, but all efforts went in vain. **(copy of application and receipt are attached)**
4. That the appellant submitted implementation/ Execution application on 25-10-2023 of the order dated 10-07-2023 passed by the KP Service Tribunal.
5. That on hearing before the service Tribunal on 17-11-2023 Representative/ Focal Person of DEO (Female) Kurram appeared before the learned KP Service Tribunal and submitted

2905
20-11-23
DISTRICT DEPT. KPA PESHAWAR

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withdrawal of the appointment order of the appellant and handover a copy of the same to the appellant first time inside the court on 17-11-2023.(Copy of withdrawal of appointment order, copy of order dated 10-07-2023 and copy of execution application are attached)

6. That the appellant/applicant has never violated any terms and conditions of the appointment order rather the appellant availed her legal remedy by filing Departmental representation, service appeal and execution application.
7. That withdrawal of appointment order of the appellant by the DEO (Female) kurram is the result of biasness, discrimination, unjust, illegal and without jurisdiction, hence liable to be set aside by this respected office.

It is, therefore, most humbly prayed that on acceptance of the instant Department Representation/ Appeal the impugned withdrawal of appointment order of the Appellant may kindly be set aside and the services of the Appellant as PST female teacher may kindly be order to continue/Restored.

APPELLANT/APPLICANT

Suhaila Hakim

CNIC# 21302-1942834-2



19/8/21
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9-8-24

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20/8/21
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To

The Additional Director of Education.

Respected Madam,

It is stated that I needed

the copy of my case which is rejected

by the education committee. Kindly

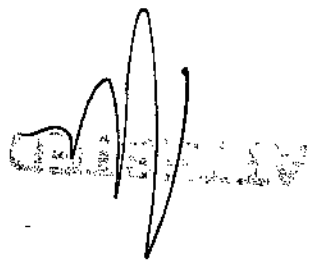
renew me the copy of my case. I shall

be thankful to you.

Applicant/ Sahiba Hakeem

(PST) Kurram District

Date / 19/8/2024



20/8/24

5/6 Pdt

Accepted and accepted by

Saif Wala Manager

at Saif Wala

Handwritten signature and text at the top of the document.

2024 09 09

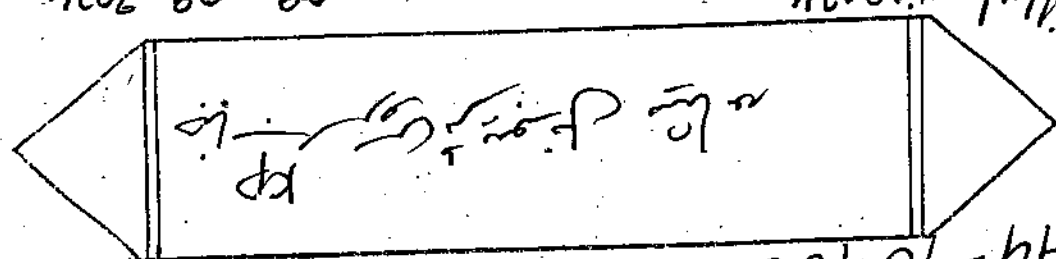
Main body of handwritten text, including a signature 'Saif Wala'.

Handwritten text below the main body.

21302 + 1942 834

0302 - 8352 106

Handwritten text and numbers at the bottom left, including '09-09-2024'.



0344-1040226
bc-15-6081
bc-24-7092
0344-1040226@gmail.com

36