


FORM OF ORDER SHEET

Court of _____

Appeal No. 2028/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	18/10/2024	<p>The appeal of Mst. Nadia Bibi presented today by Mr. Ahmad Sultan Tareen Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 29.10.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.

A. No. 2028/2024

Nadia Bibi

Vs

The DEO.(F) Haripur etc

SERVICE APPEAL

I N D E X


Sr #	Description of documents	Annexure	Pages
1	Memorandum of appeal along with affidavit		1-12
2	Copy of CRC and Fee Voucher	A	13-14
3	Pay Card for service proof of appellant's spouse	A-1	15
4	Copy of appointment order of appellant	B	16-17
5	Copy of transfer order dated 15/11/2014	C	18
6	Copy of Transfer order dated 25/07/2019	D	19
7	Copy of Adjustment / Transfer order dated 19/03/2024	E	20
8	Copy of review of appellant dated 30/03/2024	F	21
9	Copies of attendancesheets and salary slip from Payroll register of Accounts office	G	22-28
10	Copies of relievingchits dated 10/09/2024 and 18/09/2024	H & I	29-30
11	Copy of departmental appeal dated 10/09/2024	J	31
12	Copy of relieving chit dated 20/09/2024	K	32

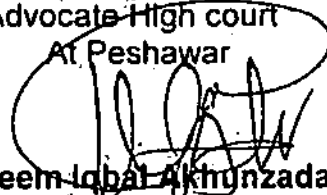
13	The copy of Charge report dated 19/09/2024	L	33
14	Copy of letter dated 19/09/2024 of respondent No. 2	M	34
15	Copy of Office order dated 19/09/2024 whereby re-validated the transfer order	N.	35
16	Copy of Charge report of Appellant dated 21/09/2024	O	36
17	Vakalatnama		37

Dated: 17/10/24

Nadia BTL
APPELLANT
(Nadia Bibi)

Through counsel:


Ahmed Sultan Tareen
Advocate High court
At Peshawar


Waseem Iqbal Akhonzada
Advocate High court
At Haripur.

①

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.

A. No. 2028/2024

Nadia Bibi wife of Malik Jahanzeb resident of village Qazian post office Khalabat Township Tehsil & District Haripur presently posted as Drawing Master (DM) at GGHS Kohala Bala Tehsil & District Haripur.

.....APPELLANT

Versus

1. The District Education officer (Female) Haripur.
2. The Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
3. Miss. Komal Javed DM (BPS-15) GGHS Makhan Tehsil & District Haripur.

.....RESPONDENTS

SERVICE APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE ORDER DATED 19/03/2024 OF RESPONDENT NO. 1 MEANT FOR TRANSFER OF THE APPELLANT, WHICH WAS VERBALLY HELD IN ABEYANCE AND THEN REVALIDATED VIDE ORDER DATED 19-9-2024 DURING PROCESS OF APPELLANT'S DEPARTMENTAL APPEAL CONFIRMING HER TRANSFER FROM GGHS MAKHAN TEHSIL HARIPUR TO GGHS KOHALA BALA TEHSIL KHANPUR, DISTRICT HARIPUR.

PRAYER

On acceptance of instant service appeal, the impugned transfer/adjustment order dated 19/03/2024 issued by respondent No. 1 and its revalidation during process of departmental appeal vide order dated 19/09/2024 tantamount to rejection of appeal are liable to be set aside with direction to the respondents to restore the posting of appellant in GGHS Makhan or for her appropriate adjustment in nearer school of plain area.

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Any other relief deemed fit for redressal of appellant's grievance appropriately in light of subsequent circumstances.

=====

Respectfully Sheweth;

1. That the appellant is resident of village Qazian which is situated at distance of about 2/3km from Haripur City/ Tehsil Headquarter Tehsil Haripur, District Haripur.
2. That the appellant is married. She is mother of 02 minor daughters one aged about 09 years (school going) and the other 01 year (suckling) with their sole dependence upon the appellant; because her spouse is a service-man in Pakistan Army with his duty on borders obviously always far away from their hometown. Presently, he is serving at Pakistan's border with India, in AJK.

(Copy of CRC and Fee Voucher are Annexure-A and that of the Pay Card for service proof of appellant's spouse is Annexure A-1).

3. That after her appointment in 2012 as Drawing Master (Female) BPS-09 in the Elementary & Secondary Education Department (department for short), the Appellant was given first posting at GGMS Najafpur, a hilly area of Tehsil Khan far away from her hometown, where she served for more than 5 years.

(Copy of appointment order is annexed herewith as Annexure-B.)

4. That vide order No. 5765 dated 15/11/2014 the Appellant was transferred from GGMS Najaf Pur to GGMS Chapri,

(3)

Tehsil Haripur but too far away from her village, from where it was not possible for her to commute in daily routine compelling her to stay at the duty station during working days. She served there for a full tenure of 03 years.

(Copy of transfer order dated 15/11/2014 is annexed as Annexure- C).

5. That vide adjustment order dated 25/07/2019 the Appellant was transferred from GGMS Chapri to GGMS Makhan after her two hard postings.

(Copy of Transfer order dated 25/07/2019 is annexed as Annexure-D).

6. That vide Adjustment / Transfer order dated 19/03/2024, the Appellant was transferred from GGMS Makhan, Tehsil Haripur to GGMS Kohala Bala situated yet in another hilly area of Tehsil Khanpur far flung from hometown of the appellant necessitating her compulsory stay at the duty station at the cost of sufferings of her children as she has to give them to the care of someone as their father would not be able to help them because of exigencies of his service away from the hometown.

(Copy of Adjustment / Transfer order dated 19/03/2024 is annexed as Annexure-E).

7. That the Appellant submitted a review before respondent No.1 the then DEO (Female) Miss. Sadia Aziz vide diary No. 1368 dated 30/02/2024 which was orally accepted by

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the then DEO (Female) and Appellant was directed to perform her duties in GGMS Makhan till her further order.

(Copy of review of appellant dated 30/02/2024

is annexed herewith as Annexure- F).

8. That from March till September 2024 the Appellant kept performing her duties in GGMS Makhan.

(Copies of attendancesheets and salary slip from Payroll register of Accounts office are annexed herewith as Annexure-G).

9. That thereafter, the respondent No. 1 (present incumbent) assuming the Charge as DEO (Female) Haripur directed to implement the earlier adjustment / transfer order. i.e. 19/03/2024 only to adjust the respondent No. 3 under transfer from GGHS Khalo Ghazi to GGHS Makhan in place of appellant.

10. That the Headmistress of GGHS Makhan was forced by the respondent No.1 to relieve the appellant and the former, on 10/09/2024, handed over a relieving chit to the appellant bearing back date. i.e. 27/03/2024 but upon objection of appellant, the Headmistress of GGHS Makhan issued another relieving chit bearing Endst. No. 134 dated 18/09/2024.

(Copies of relieving chits dated 10/09/2024 and 18/09/2024 are annexed herewith as Annexure-H & I).

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11. That upon receiving of the relieving chit, the appellant submitted a departmental appeal against the impugned Adjustment / Transfer order dated 19/03/2024 before Director Elementary & Secondary Education Department KPK Peshawar on 10/09/2024.

(Copy of departmental appeal dated 10/09/2024 is annexed as Annexure-J).

12. That the appellant made objection upon the back dated relieving chit on the ground that the Appellant has been performing her duty in GGMS Makhan from March till September 2024 therefore, the Headmistress once again issued a relieving chit of Appellant on 20/09/2024.

(Copy of relieving chit dated 20/09/2024 is annexed as Annexure- K).

13. That the Appellant was forced to make arrival at GGHS Kohala Bala which was recorded in Charge Report of Transfer of Charge dated 19/09/2024.

(The copy of Charge report dated 19/09/2024 is annexed as Annexure-L).

14. That vide letter No. 2947 / E.No. F-341 Vol-4//F/Appeal/Haripur dated 19/09/2024, the respondent No. 2 sent the departmental appeal of appellant to respondent No. 1 with direction to take further necessary action as per rules / policy.

(Copy of letter dated 19/09/2024 of respondent No. 2 is annexed as M).

15. That on the same date i.e. 19/09/2024, the respondent No. 1 issued an order revalidating the earlier impugned order dated 19/03/2024 surely in compliance of the directive of Respondent No. 2 making the departmental appeal redundant tantamount to its rejection.

(Copy of Office order dated 19/09/2024 whereby re-validated the transfer order is annexed as-N)

16. That thereafter the Headmistress GGHS Kohala Bala once again issued a Charge report of Appellant on 21/09/2024 on the strength of re-validating order dated 19/09/2024.

(Copy of Charge report of Appellant dated 21/09/2024 is annexed as O)

17. That, since the departmental appeal of appellant has been decided impliedly by way of revalidation of transfer order leaving no room for second departmental appeal under the circumstances; the appellant is impelled to invoke the jurisdiction of this Hon'ble Tribunal with present service appeal on the grounds, inter alia, as follow:- no statutory period is required to file the instant service appeal, hence, this service appeal inter alia on the following serious and grave personal (humanitarian) grounds:-

GROUNDS:

a) That facts as highlighted above regarding particular family circumstance of the appellant, she is entitled under the prevailing Transfer/Posting Policy of the Government of Khyber Pakhtunkhwa for consideration of her appeal on humanitarian grounds besides arbitrariness and perversity of the impugned orders passed by the official respondents.

b) That previously the appellant remained posted in far flung hilly area of Tehsil Khanpur at GGMS Najaf Pur for 05 years and another three years in GGMS Chapri in the circumstances already discussed above. Therefore, the transfer of appellant to Kohala Bala yet another hilly area of Tehsil Khanpur requiring her compulsory stay over their during working days. The appellant is at loss to understand about her aforementioned transfer apparently showing no exigency of the public interest except believing that she has been picked up to make a room for adjustment of respondent No. 3 as a favor to the latter. Thus, the impugned transfer order is inherently wrong, erroneous, against the posting/transfer

policy, and prone to favoritism at the cost of public interest.

c) That GGHS Kohala Bala is a hilly area approximately 80 kilometers away from the house of Appellant i.e. village Qazian. In view of the particular travelling route, the hardship of catching 03 vehicles alternatively to commute between her residence and duty station with a baby in lap make it impossible to travel in routine; otherwise compelling her to stay at the duty station leaving the school going baby behind at the mercy of none. Thus, a strong humanitarian ground for transfer of the appellant back to GGHS Makhan or adjustment in any other near school in the surroundings of appellant's native village.

d) That the husband of Appellant is in service of Pakistan Army and posted far-flung areas of the country therefore, the entire house hold, parenting and family responsibilities lies on the shoulders of Appellant.

e) That the appellant has to bear huge opportunity cost by way of travelling every day on rented vehicles / public transport, the monthly travelling expenses incurred upon

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reaching and returning from GGHS Kohala are Rs. 20,000/- to 25,000/- per month thus the impugned transfer order is harsh and pressing towards the appellant.

- f) That the impugned transfer order has been made just to accommodate respondent No. 3 by transferring her from GGHS Khalo Ghazi to GGHS Makhan without adhering the policy of posting / transfer which makes it mandatory that *"all posting / transfers shall be strictly in public interest and shall not be abused / misused to victimize the government servant"*
- g) That the departmental appeal of appellant was decided in manner extraneous to law, and principles of natural justice, the respondent No. 2 being Appellate authority was duty bound to decide the departmental appeal of appellant fairly and by herself but contrary to the law and principles of natural justice, the respondent No. 2 sent the appeal of appellant to the very DEO (Female) Haripur / respondent No. 1 for taking necessary action who passed the impugned transfer order of the appellant.

h) That the respondent No. 1 upon receiving the letter from respondent No. 2 in colorful exercise of power has made the departmental appeal of appellant redundant by way of re-validating the impugned order dated 19/03/2024; thus, the appellant was not dealt with in accordance with law hence, the impugned transfer order dated 19/03/2024 as well as order dated 19/09/2024 of respondent No. 1 are liable to be set aside.

i) That the respondents have deliberately defied the government policy, ignored the settled position of law and the dictums of superior courts with regard to transfer of civil servant particularly of female teacher hence, the impugned transfer order as well as revalidating order are arbitrary, fanciful and result of misuse of authority, hence liable to be set aside.

j) That this service appeal is well within time and this Honourable Tribunal has got jurisdiction to entertain and adjudicate upon the lis.

It is therefore, respectfully prayed that on acceptance of instant service appeal the impugned adjustment / transfer order of respondent No. 1 dated 19/03/2024 whereby appellant was transferred from GGHS Makhan to GGHS

(11)

Kohala Bala and that of re- validating order dated 19/09/2024 whereby the departmental appeal of appellant was dismissed, may graciously be set aside and appellant may be granted relief as per prayer in the heading above.

Dated:

17/10/24

Nadia Bibi
APPELLANT
(Nadia Bibi)

Through counsels:

Ahmed Sultan Tareem
Ahmed Sultan Tareem
Advocate High court
At Peshawar.

Waseem Iqbal Akhunzada
Waseem Iqbal Akhunzada
Advocate High court
At Haripur.

Verification:

It is verified that the contents of above memorandum of appeal are true and correct to the best of my knowledge and belief.

Dated:

17/10/24

APPELLANT
(Nadia Bibi)

Nadia Bibi

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BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.

Nadia Bibi

Vs The DEO (F) Haripur etc

SERVICE APPEAL

AFFIDAVIT

I, Nadia Bibi wife of Malik Jahanzeb resident of village Qazian post office Khalabat Township Tehsil & District Haripur the appellant do hereby solemnly affirm and declare on oath that the contents of above tiled memorandum of appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble tribunal.

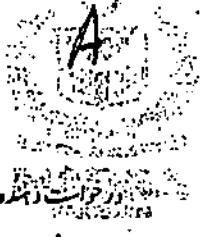
Dated: 18.10.2024

Nadia
DEPONENT



حکومت پاکستان
نیشنل ڈیٹا بیس اینڈ رجسٹریشن اتھارٹی (وزارت داخلہ)
انٹرنیٹ سے کم عمر بچوں کا سرٹیفکیٹ *

(13)



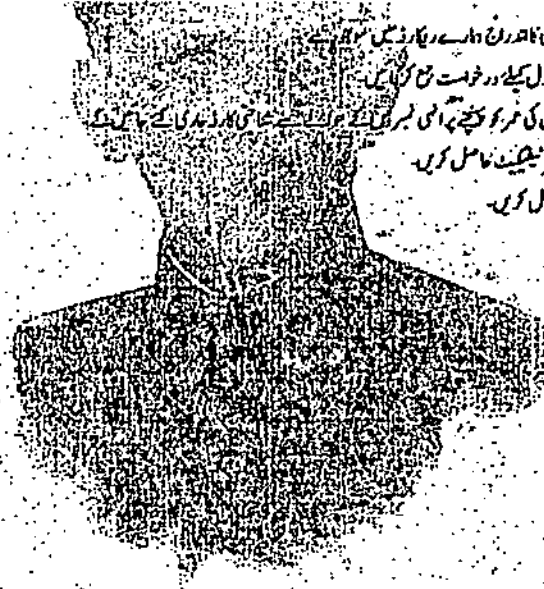
13302-6074858-1

درخواست دہندہ کا شناختی کارڈ نمبر:

ملک جہازیب

درخواست دہندہ کا نام:

نمبر شمارہ	بچے کا نام اور رجسٹریشن نمبر	والد کا نام اور شناختی کارڈ نمبر	جنس اور رشتہ	پیدائش کا تاریخ اور ملک	سطوری
1	ملک جہازیب 13302-6073052-6	ملک جہازیب 13302-6074858-1	لڑکی	ہری پور، ہری پور 2015-04-04	کوئی نہیں
2	فاطمہ ملک 13302-9245528-8	ملک جہازیب 13302-6074858-1	لڑکی	ہری پور، ہری پور 2023-09-01	کوئی نہیں



- 1- اس سٹیٹ کے مندرجہ بالا افراد سال سے کم عمر 2 سے 18 سال کے افراد ہوں گے اور ان کے پاس شناختی کارڈ نہیں ہوگا۔
- 2- درج شدہ بچے کی عمر ان افراد سال سے کم ہوگی اور ان کے شناختی کارڈ کے حصول کیلئے درخواست جمع کرنا ہوگی۔
- 3- اس سرٹیفکیٹ کو سنبھال کر ان بچوں کے ان افراد سال کی عمر کو پہنچنے پر ایسی سرٹیفکیٹ کے ساتھ ساتھ ان کے شناختی کارڈ کے حصول کیلئے درخواست جمع کرنا ہوگی۔
- 4- ان افراد کے شناختی کارڈ کی طور پر ان کے والدین کو نامی اور نیاز رجسٹریشن سرٹیفکیٹ حاصل کریں۔
- 5- کوآف کی تبدیلی کی صورت میں نیاز رجسٹریشن سرٹیفکیٹ حاصل کریں۔

(Handwritten Signature)

دستکار جنرل جنرل
تاریخ: 2024-01-05



ڈاک خانہ کلابت ہاؤس سٹریٹ، قاضی، تحصیل و ضلع ہری پور



1330260748581

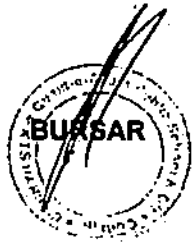
یہ سرٹیفکیٹ درج بالا بچوں کی شناخت اور مندرجہ بالا کوآف و معلومات ثابت کرنے کیلئے قابل اثر ہے (6) تاریخ: 9 مارچ 2000ء سے 2000ء بطور ثبوت قابل قبول ہے۔

14

QUAID-E-AZAM PUBLIC SCHOOL & GIRLS COLLEGE

Sector # 2, Imran Shah Chowk K.T.S (Haripur) Phone # 0995-619562

20	Date:	6/9/2024	
From Mr.	Malik Jhanzeb		
Name of Student		Class	
Kashaf Dua		4th	
ON ACCOUNT OF			
Particulars	Receivable Amount	Concession	Amount Received
CAS Charges	0	0	0
T.Fee Jul/Aug/Sep	18330	0	18330
Absent Fine	0	0	0
	0	0	0
Payable Amount	18330	0	18330




15

PAID CARD CERT

A-1

Certified that PAID Card has not been issued to M-4516300 L/Hav. Malik Jhazibi of 647 Mjd Regt. Prep of new PAID Card is under process. This cert will be considered as mil proof till issuance of new Pak Army Card.

Sta : B D
Dated: 20 Feb 2024


Issuing Auth

16

B

OFFICE OF THE EXECUTIVE DISTRICT OFFICER
Appointment Order

PH No. (995-610178, 613244



Consequent upon the selection of the candidates by the Departmental Selection Committee in final meeting held on 31-12-2011 and approval of the competent forum the appointments of the following trained DM (Female) are hereby ordered in DPS-09 on regular basis without pension and gratuity as per new service structure 80% initial recruitment for DM provided by the Govt of Khyber Pakhtunkhwa Elementary & Secondary Education Department Peshawar vide Notification No. SO (PE) 4-5/SSRC/Vol-III dated 18-01-2011 and revised notification dated 16.6.2011 in the schools as noted against the name of each on the terms & conditions mentioned below with effect from the date of taking over charge in the interest of public service.

Sl. No	Roll No	Name & Father Name / Address	D.O.B	Qualification	Total Merit Score	Place of Posting	Remarks
1		Huma Sajid D/O Muhammad Sajid Village S.N.Khan Haripur	02-12-1983	MA / DM	49.955	GGHS Kangra Colony	Against Vacant Post
2	449	Safeela Bibi D/O Elahi Dad R/O Village Rehana Haripur	22-03-1977	MA / DM	49.726	GGHS Chajjian	Against Vacant Post
3	1766	Sidra Bibi D/O Muhammad Safdar R/O Village Jab Haripur	15-04-1983	MA / DM	48.497	GGHS Halli	Against Vacant Post
4	1603	Humara Younus D/O Muhammad Younas R/O Village Sirja Haripur	30-07-1988	BA / DM	47.336	GGMS Koriplan	Against Vacant Post
5	290	Aisha Bibi D/O Sultan Bahadur R/O Village Kot Najibullah Haripur	01-01-1989	BA / DM	46.735	GGHS Kharian	Against Vacant Post
6	3539	Shahida Sultan D/O Sultan Ali R/O Vill: Jabri Haripur	04-08-1985	MA / DM	46.038	GGHS Jabri	Against Vacant Post
7	1913	Nadia Bibi D/O Haji Ashraf R/O KTS Haripur	10-01-1983	BA / DM	45.34	GGMS Najapur	Against Vacant Post

Terms & Conditions

- The appointments of the above candidates are on regular basis but without pension and gratuity in terms of Section 19 of NWFP Civil Servants Act 1973 and as amended vide Khyber Pakhtunkhwa Civil Servants (Amendments) Act 2005 they will however be entitled to contributory provident Fund in such a manner and at such rates as may be prescribed by the Government.
- They will get Salary in DPS-09 plus usual allowances as due and admissible under the rules.
- Their services can be terminated at any time in case their performances are found unsatisfactory, in case of misconduct they will be proceeded under the rules framed by Govt of Khyber Pakhtunkhwa from time to time & E&D Rules 2011.
- The Drawing & Disbursing officer concerned are bound to examine original Certificates/ Degree of candidates before handing over charge and salary of the candidates to be released after obtaining successful verification of certificates / Degree from the board universities concerned. In case of any illegality / irregularity in this regard the Drawing & Disbursing Officer concerned will be held responsible for the consequences.

Prepared By: Muhammad Anwar Ahmed + Imran Khan

PAGE 2 OF 2
OFFICE OF THE EXECUTIVE DISTRICT OFFICER



5. In case a document or documents is/are found fake or forged or bogus on such scrutiny or the verification the service of the teacher concerned shall be terminated. The whole amount paid to his/her as salary shall be recovered and a case against him/her shall be registered under relevant section of law.
6. If they want to resign from the service, they will have to serve one-month prior notice, failing which they will have to deposit one month pay in lieu of such notice, in the Government treasury.
7. They should join their post with in 15 days of the issuance of this order. The DDOs concerned should furnish certificates to the effect that the candidates appointed have join the post or otherwise after 15 days of the issuance of this order.
8. They will bound to produce Health and age certificate issued by the Medical Superintendent District Head Quarter Hospital Haripur with in 07 days of taking over charge.
9. The appointment for institution where candidates have been appointed / posted will be transferable / adjustable to any other institution after tenure of 02 years.
10. The appointees will provide the Character Certificate verified by the two Gazetted Officers at the time of taking over charge.
11. Charge report should be submitted to all concerned in duplicate.
12. No under age / over age candidate should be allowed to take charge with out relaxation by the authority concerned if any found in notice, this office may informed immediately.
13. They will be entitled for annual increment after completion of one year service.
14. No. TA/DA is allowed to any one.

sd/
ABDUL QUDOOS
Executive District Officer
Elementary & Secondary Education
Haripur
Dated: 9 / 21 / 2012

Endst: No. 357-71
Cc:

1. The Secretary Elementary & Secondary Education Department Govt of Khyber Pakhtunkhwa Peshawar.
2. The Director Elementary & Secondary Education Department Govt of Khyber Pakhtunkhwa Peshawar.
3. The District Coordination Officer Haripur.
4. All the members of District Selection Committee.
5. The Senior District Accounts Officer Haripur.
6. The Principals/Headmistresses concerned.
7. Candidates concerned.
8. Office record file.

HA
District Officer (Kamoke)
Elementary & Secondary Education
Haripur

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Handwritten text or date at the top right.

NOTE:

S.No	Name	Designation/School	From	To	Remarks
		Zangia Raja, DM	EGXIS Chhara	EGXIS Chhara	
			EGXIS Naga	EGXIS Chhara	

The following masters' withdrawal of teachers are hereby ordered on her own pay and grade in the interest of public service with immediate effect.

TRANSFER ORDER

Dated 15/11/2014

Signature and stamp of the official.

Official stamp and text at the bottom of the document.

Handwritten number or mark at the bottom center.



(19) 0

OFFICE OF THE
DISTRICT EDUCATION OFFICER (FEMALE)
HARIPUR

(Office Phone No. 0995-613244 Fax No. 0995-612552)


ADJUSTMENT ORDER:-

The District Education Officer (Female), District Haripur is pleased to transfer the following teachers of Elementary & Secondary Education (Female), District Haripur against vacant post on their own pay & scale in the best interest of public service with immediate effect.

Sr. No.	Name/ Designation	From	To	Remarks
1.	Ms. Nadia Bibi, D.M. (BPS-15)	GGMS Chapri	GGMS Makhan	Vice Sr. No. 02
2.	Ms. Shama Anjum, D.M. (BPS-15)	GGMS Makhan	GGMS Chapri	Vice Sr. No. 01
3.	Ms. Noreen Sultan, D.M. (BPS-15)	GGHS New Bakka	GGHS Kangra Colony	Against vacant post on need basis.

Note:-

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

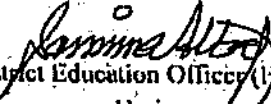

District Education Officer (Female)
Haripur

Encl: No. 10967T7L

Dated: 25 / 07 / 2019

Copy for information to:-

1. The District Account Officer, Haripur.
2. The District Monitoring Officer, IMU (Education), Haripur.
3. The Principals/Headmistresses concerned.
4. The Officials concerned.
5. Office record file.


District Education Officer (Female)
Haripur

**OFFICE OF THE
DISTRICT EDUCATION OFFICER (FEMALE)
HARIPUR**

(Office Phone No. 099-820138)



ADJUSTMENT ORDER

The adjustment order in respect of the following teachers is hereby issued on their own pay and scale in the best interest of the Government.

Sr. No.	Name & Designation	From	To	Remarks
1	Ms. Thirina Shaha (CT BPS-15)	GMN Nisou	GMN Bara Sakh	Against vacant post
2	Ms. Rabia Tabassum (SST G BPS-16)	GMN Jani	GHSS Mudi	Against Vacant Post
3	Ms. Komal Javed (DM BPS-15)	GHSS	GMN Makhin	Vico Sr. No. 4
4	Ms. Misbah Biri (AM BPS-15)	GMN Makhin	Kohala Fila	Against Vacant Post
5	Ms. Misbah Biri (AT BPS-15)	GMN Jibon	Bandi Khuson	Against Vacant Post
6	Ms. Salma Biri (Sr. PET BPS-16)	GMN Simya	GMN Baridra	Vico Sr. No. 7
7	Ms. Noeen Biri (Sr. PET BPS-16)	GMN Baridra	GMN Sign	Vico Sr. No. 8
8	Ms. Ayesha Biri (Sr. CT BPS-16)	GMN Baridra	GMN Mung	Vico Sr. No. 9
9	Ms. Rubia Khatun (Sr. CT BPS-16)	GMN Baridra	GMN Baridra	Vico Sr. No. 8
10	Ms. Bibi Nayyar (CT BPS-15)	GMN Vijian (JICA)	GMN Baridra	Under Rationalization Policy

Note:-

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

District Education Officer (Female)
Haripur
Sadia Aziz

Date: 19/5/2024

Endec No. 27/2024
Copy forwarded to the:

1. The District Accounts Officer, Haripur.
2. The District Monitoring Officer, Education, Haripur.
3. The Principals/Headmistresses concerned.
4. Teachers Concerned.
5. Office Copy.

District Education Officer (Female)
Haripur

30-03-2019

1368

مجلس شورای اسلامی

بسم الله الرحمن الرحيم
الحمد لله رب العالمين والصلاة والسلام على سيدنا محمد
الطاهر المصطفى وآله الطيبين الطاهرين أجمعين
والعقب الطيبين الطاهرين أجمعين
والسلام على من لا ينال مثل مقامه
ولا ينال مثل مقامه
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والسلام على من لا ينال مثل مقامه

بسم الله الرحمن الرحيم
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والعقب الطيبين الطاهرين أجمعين
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1368
30-03-2019

مجلس شورای اسلامی

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الطاهر المصطفى وآله الطيبين الطاهرين أجمعين
والعقب الطيبين الطاهرين أجمعين
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2024-25
 Sarda
 13302-4650
 0331-7171

Shobeen Jain Patil
 13302-4650
 0331-7171

رجسٹری سٹاف کی فہرست

Sl. No.	Name	Designation	Grade	Pay Band	Basic Pay	Dearness Allowance	House Rent Allowance	Medical Allowance	Gr. Pay	Remarks
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30	Monday	Monday	Monday	Monday	Monday
31	Monday	Monday	Monday	Monday	Monday

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Handwritten text in Urdu script, possibly a signature or name, located at the bottom right of the page.

2021

Jan	Feb	Mar	Apr	May	Jun
Jul	Aug	Sep	Oct	Nov	Dec

September 06

Departure Time 1:35

Train No. 6805 K. Madurai B.P.R.

Handwritten scribbles and initials in the top left corner.

Saturday - Sunday - Sunday

Sunday - Sunday

Staff Attendance

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27

G.M.S. Madurai

Handwritten signature or name.

88

ADDRESS OFFICE MEMPHIS
PAYROLL DIVISION
FOR THE MONTH OF JUNE 2024

ACCOUNT NAME	AMOUNT	ACCOUNT NAME	AMOUNT
3015 GPF Subscriptions	4,290.00	3015 GPF Subscriptions	4,290.00
3001 Development Fund	1,200.00	3001 Development Fund	1,200.00
3990 Exp. Cont. Fund MGR.	135.00	3990 Exp. Cont. Fund MGR.	135.00
4004 R. Benefits & Death C	400.00	4004 R. Benefits & Death C	400.00
3109 Income Tax	588.00	3109 Income Tax	588.00
	6,613.00		6,613.00

ACCOUNT NAME	AMOUNT	ACCOUNT NAME	AMOUNT
3015 GPF Subscriptions	4,290.00	3015 GPF Subscriptions	4,290.00
3001 Development Fund	1,200.00	3001 Development Fund	1,200.00
3990 Exp. Cont. Fund MGR.	135.00	3990 Exp. Cont. Fund MGR.	135.00
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3109 Income Tax	588.00	3109 Income Tax	588.00
	6,613.00		6,613.00

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3990 Exp. Cont. Fund MGR.	135.00	3990 Exp. Cont. Fund MGR.	135.00
4004 R. Benefits & Death C	400.00	4004 R. Benefits & Death C	400.00
3109 Income Tax	588.00	3109 Income Tax	588.00
	6,613.00		6,613.00

ACCOUNT NAME	AMOUNT	ACCOUNT NAME	AMOUNT
3015 GPF Subscriptions	4,290.00	3015 GPF Subscriptions	4,290.00
3001 Development Fund	1,200.00	3001 Development Fund	1,200.00
3990 Exp. Cont. Fund MGR.	135.00	3990 Exp. Cont. Fund MGR.	135.00
4004 R. Benefits & Death C	400.00	4004 R. Benefits & Death C	400.00
3109 Income Tax	588.00	3109 Income Tax	588.00
	6,613.00		6,613.00

ACCOUNT NAME	AMOUNT	ACCOUNT NAME	AMOUNT
3015 GPF Subscriptions	4,290.00	3015 GPF Subscriptions	4,290.00
3001 Development Fund	1,200.00	3001 Development Fund	1,200.00
3990 Exp. Cont. Fund MGR.	135.00	3990 Exp. Cont. Fund MGR.	135.00
4004 R. Benefits & Death C	400.00	4004 R. Benefits & Death C	400.00
3109 Income Tax	588.00	3109 Income Tax	588.00
	6,613.00		6,613.00

NET PAY 6,613.00
 DEDUCTIONS 1,174.00
 GROSS PAY 7,787.00

29

H

Office of the Headmistress Govt Girls Middle School Makhan

RELIEVING CHIT

It is certified that Miss Nadia Bibi DM BPS -15 has been transferred from GGMS Makhan vide District Education Office Female Haripur Office order # 2174-771 dated: 19-03-2024

You are hereby relieved off from your duties today on 27-03-2024 and directed to report your station immediately.

Dated: 27-3-2024

Signature of headmistress



Received
10-09-2024

30

I

Office of the Headmistress Govt Girls Middle School Makhan

RELIEVING CHIT

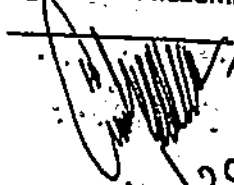
It is certified that Miss Nadia Bibi DM BPS -15 has been transferred from GGMS Makhan vide District Education Office Female Haripur. Office order # 2174-771 dated: 19-03-2024.

You are hereby relieved off from your duties today on 18-09-2024 and directed to report your station GGHS kohala bala Immediately.

Dated: 18-9-2024

Ends# # 134

Signature of headmistress



18/9/2024
Head Mistress
Govt Girls Middle School
Makhan Haripur

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32

K

OFFICE OF THE HEADMISTERSSS GGMS MAKHAN HARIPUR

Relieving Chit

It is certified that Miss. NADIA BIBI (DM) BPS-15 W/O JAHANZEB, has been Transferred from GGMS MAKHAN to GGHS KOHALA BALA Transfer order No.2174-771 Dated: 19-03-2024 E &SE Haripur & Re Adjustment Order No. 7072-78 Dated: 19-09-2024 E &SE Haripur.

She is relieved from her duties from GGMS Makhan Haripur on 20-09-2024 and directed to report GGHS KOHALA BALA.

HEADMISTRESS

[Signature]
20-09-2024
Head Mistress
Govt Girls Middle School
Makhan Haripur

33

CHARGE REPORT OF TRANSFER OF CHARGE

Certified that we have on the before / after noon this day respectively made over
And charge of the vacant post of DM at GGHS KOHALA BALA HARIPUR, District
Education Officer(F) Haripur transfer file Endst.No: 2174-771/ Date: 19-03-2024
Charge Date: 19/09/2024.

Signature of relieved vacant
Government servant _____
Designation _____

Station: - GGHS KOHALA BALA HARIPUR

Signature of relieving Nadia
Government servant NADIA BIBI
Designation DM (BPS 15)

Bibi Fatima
HEAD MISTRESS
G.G.H.S KOHALA BALA
HARIPUR

Copy of the above is submitted for information to:-

1. DEO Office (F) Haripur
2. DAO Office haripur
3. School record.
4. The teacher concerned.

39

M



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR

No. 29447 / P.No. F-14 / Vol-1117 / Appeal / Haripur

Dated Peshawar the 21/9/2021

The District Education Officer
(Female) Haripur

Subject: APPEAL

Attn:

I am directed to refer to the subject cited above and to enclose herewith a copy of appeals to Mst. Nadia Bibi DM, GGMS Makhlan Haripur for further necessary action as per rules/policy.

Encls No: _____

Copy of the above is forwarded to the:

1. PA to Director E&SE KPK Peshawar

[Signature]
Assistant Director (Female)
E&SE Khyber Pakhtunkhwa

[Signature]
Assistant Director (Female)
E&SE Khyber Pakhtunkhwa

18/9/2021

35

N



OFFICE OF THE
DISTRICT EDUCATION OFFICER (FEMALE)
HARIPUR

(Office Phone No. 0995-920155)

OFFICE ORDER

This office adjustment order issued vide Endst.No.2174-77 dated 19/03/2024, Ms. Nadia Bibi DM (BPS-15) transferred from GGMS Makhan to GGHS Kohala Bala (mentioned in order at S.No.04) is hereby re-validate with immediate effect in the best interest of public service.


District Education Officer (Female),
Haripur

Endts: No. 7072-78

Dated Haripur the 19/09/2024.

Copy for information to the :-

1. The Director E&SED, KPK Peshawar.
2. The Deputy Commissioner, Haripur
3. District Monitoring officer (DMA) Haripur.
4. Senior District Account officer Haripur.
5. Principal/Headmistress concerned.
6. Official concerned.
7. Office Record file.


District Education Officer (Female)
Haripur

(36)

0

CHARGE REPORT OF TRANSFER OF CHARGE

Certified that we have on the before / after noon this day respectively made over
And charge of the vacant post of DM at GGHS KOHALA BALA HARIPUR, District
Education Officer(F) Haripur transfer file Endst No: 2174-771/ Date: 19-03-2024
Mentioned in order at S.No.04 is hereby re-validate 19-09-2024, Office ends
No 2072-78 Dated 19-09-2024, Charge Date: 21-09-2024.

Signature of relieved vacant
Government servant _____
Designation _____

Station: - GGHS KOHALA BALA HARIPUR

Signature of relieving Nadia Bibi
Government servant NADIA BIBI
Designation DM (BPS 15)

I/g. P. P. P.
HEAD MISTRESS
G.G.H.S KOHALA BALA
HARIPUR

Copy of the above is submitted for information to:-

1. DEO Office (F) Haripur
2. DAO Office haripur
3. School record.
4. The teacher concerned.

وکالت نامہ

کورٹ فیس
تہی

بعدالت جناب صدر کونٹونخواہ سپریم ٹریبیونل لیٹاور

منجانب ایم ایچ اینڈ
نادیہ بی بی

دعویٰ یا جرم سرسین اپیل
باعث خراب آنکھ من ایچ اینڈ

مندرجہ بالا عنوان میں اپنی طرف سے بیرونی وجوہات ہی مقام لیٹاور

ایڈووکیٹ بدیں شرط دیکل مقرر کیا۔ کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص
رودت و عدالت حاضر ہو کر ہوں گا۔ اور ہوتے پکارے جانے وکیل صاحب موصوف کو اطلاع دے کر حاضر کروں گا۔ اگر کسی

پیشی پر منظر حاضر نہ ہوں اور حاضری کی وجہ سے کسی وجہ پر مقدمہ میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ
ہوئے۔ نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ کسی اور جگہ یا پکھری کے مقرر اوقات سے پہلے یا بروز

تعطیل بیرونی کرنے کے مجاز نہ ہوئے۔ اگر مقدمہ مقام پکھری کے کسی اور جگہ سماعت ہونے یا بروز پکھری کے اوقات
کے آگیا یا پیچھے ہونے پر منظر کو کوئی نقصان پہنچے تو ذمہ دار یا اس کے رابطے کسی مجاوضہ ادا کرنے مختار نامہ واپس کرنے کے

بھی صاحب موصوف ذمہ دار نہ ہوئے۔ مجھے کل ساختہ پر ساختہ صاحب مثل کردہ ذات خود منظور قبول ہوگا اور صاحب
موصوف کو عرضی دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی اپیل نگرانی دائر کرنے نیز ہر قسم کی درخواست پر دستخط تصدیق

کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کے اجرا کرنے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے
کا ہر قسم کا بیان دینے اور سپرد وراثی و راضی نامہ و فیصلہ بر خلاف کرنے اقبال دعویٰ کا اختیار ہوگا۔ اور بصورت اپیل و

برآمدگی مقدمہ یا منسوخ ڈگری یا نظر درخواست حکم انتہائی یا ڈگری قبل از فیصلہ اجراءے ڈگری بھی صاحب موصوف
بشرط ادا تین علیحدہ بیرونی مختار نامہ کریں کا مجاز ہوگا۔ اور بصورت ضرورت اپیل یا اپیل کے واسطے کسی دوسرے وکیل یا پکھری

کو بجائے اپنے ہمراہ مقرر کریں اور ایسے مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوئے جیسے صاحب
موصوف کو۔ پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا۔ تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی بیرونی نہ

کریں اور ایسی حالت میں میرا مطالبہ صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا اختیار نامہ لکھ دیا ہے کہ سند ہے۔

مختار نامہ سن لیا ہے اور اچھی طرح سمجھ لیا اور منظور ہے۔
مورثہ: 17/11/2024

العبد العبد العبد

Naeh BTbt

نادیہ بی بی

Accepted
At Durrani