


FORM OF ORDER SHEET

Court of _____

Appeal No. 2016/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	16/10/2024	<p>The appeal of Mst. Humaira Bibi resubmitted today by Mr. Shah Faisal Nasapi Advocate. It is fixed for preliminary hearing before t Single Bench at Peshawar on 24.10.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman.</p> <p> REGISTRAR</p>

The appeal of Mst. Humaira Bibi received today i.e on 01.10.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Appeal has not been flagged/marked with annexures marks.
- 2- Affidavit is not attested by the Oath Commissioner.
- 3- Annexures of the appeal are unattested.
- 4- Copies of order dated 06.06.2023, 15.08.2024 and 5.05.2023 mentioned in the memo of appeal is not attached with the appeal be placed on it.
- 5- Annexures-10, 11 and 16 of the appeal are illegible be replaced by legible/ better one.

No. 854 /Inst./2024/KPST,

Dt. 01/10 /2024.

Amirullah
ADDITIONAL REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Shah Faisal Nasapi Adv.
High Court at Peshawar.

Re *Submission*



6/5/23. (16)
15/8/24 (23)
7/9/23 (21)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

CHECK LIST

1.	Case Title	Mst. Humaira Bibi Vs The Secretary E&SE and others	
2.	Case is duly signed.	Yes ✓	No
3.	The law under which the case is preferred has been mentioned.	Yes ✓	No
4.	Approved file cover is used.	Yes ✓	No
5.	Affidavit is duly attested and appended.	Yes ✓	No
6.	Case and annexures are properly paged and numbered according to index.	Yes ✓	No
7.	Copies of annexures are legible and attested. If not, then better copies duly attested have annexed.	Yes ✓	No
8.	Certified copies of all requisite documents have been filed.	Yes ✓	No
9.	Certificate specifying that no case on similar grounds was earlier submitted in this court, filed.	Yes	No
10.	Case is within time.	Yes ✓	No
11.	The value for the purpose of court fee and jurisdiction has been mentioned in the relevant column.	Yes	No
12.	Court fee in shape of stamp paper is affixed. [For writ Rs. 500, for other as required]	Yes	No
13.	Power of attorney is in proper form.	Yes ✓	No
14.	Memo of addressed filed.	Yes ✓	No
15.	List of books mentioned in the petition.	Yes	No
16.	The requisite number of spare copies attached [Writ petition-3, civil appeal (SB-2) Civil Revision (SB-1, DB-2)]	Yes ✓	No
17.	Case (Revision/ Appeal/petition etc) is filed on a prescribed form.	Yes	No
18.	Power of attorney is attested by jail authority (for jail prisoner only)	Yes	No

It is certified that formalities/documentations as required in column 2 to 18 above, have been fulfilled.

Signature:- 

FOR OFFICE USE ONLY

Case:- _____

Case received on _____

Complete in all respect: Yes/ No, (If No, the grounds) _____

Date in court:- _____

Signature _____

(Reader)

Date:- _____

Countersigned:- _____

(Deputy Registrar)

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

Service Appeal No. 2015 /2024

Mst. Humaira Bibi.....Appellant

V E R S U S

The Secretary E& SE & others.....Respondents

I N D E X

S#	Description of Documents	Annex	Pages
1.	Service Appeal		1-7
2.	Affidavit		8
3.	Addresses of parties		9
4.	Appointment order	A	10
5.	Adjustment order dated 23.09.2008 Salary, CNIC & affidavit	B	11-14
6.	Notification dated 06.08.2020 and Guidance etc	C	15-19
7.	Order dated 07.09.2023 and application	D	20-22
8.	Notification dated 15.08.2024	E	23
9.	Departmental Appeal	F	24
10.	Wakalatnama		25

Through Appellant

Shah Faisal Nasapi

Advocate

Supreme Court of Pakistan

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

Khyber Pakhtunkhwa
Service Tribunal

Service Appeal No. 2016 /2024

Diary No. 16203

Dated 01/10/2024

Mst. Humaira Bibi Wife of Syed Waheed ur Rehman
(SPST) G.G.P.S Kaniwar Tehsil Tangi District Charsadda
.....Appellant

V E R S U S

1. Govt of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education, Peshawar.
2. District Education Officer (DEO) District Charsadda
3. Secretary Establishment Government of Khyber Pakhtunkhwa, Peshawar
4. Director of Secondary & Elementary Education, Peshawar.....**Respondents**

Filed to-day

Registrar

**APPEAL U/S 4 OF THE KHYBER
PAKHTUNKHWA SERVICES TRIBUNAL
ACT, 1974 FOR DECLARATION TO THE
EFFECT THAT IMPUGNED NOTIFICATION
DATED: NO.SO (POLICY) E & AD/1-
3/2020 DATED 06.06.2023 AND
DELETION OF RULE-7 (5) KP CIVIL
SERVANT, APPOINTMENT, PROMOTION
AND TRANSFER RULES IN THE KP CIVIL
SERVANT ACT (AP&T) RULES, 1989,**

Re-submitted to-day
and filed.

Registrar

16/2/24

**OFFICE ORDER DATED 15.08.2024
BEING NO.46/7-21, APPOINTMENT,
PROMOTION AND TRANSFER MAY BE
DECLARED AS ILLEGAL, AGAINST THE
LAW.**

Prayer-In-Appeal

**On acceptance of the instant
appeal, the impugned notification
No.SO(Policy)E&AD/1 3/2020 dated:
06.06.2023 and office order No.45/7-
21 dated 15.08.2024 may be declared
as illegal, against the law ineffective
upon the rights of the appellant &
ordered to be struck down being void
and ultra vires to the rules and rights of
the appellant.**

Respectfully Sheweth:

Short facts, giving rise to present Service Appeal, are
as under:

1. That appellant hails to respectable family of District Charsadda and bonafide citizen of Pakistan, being qualified was appointed as PTC trained teacher BPS-7.

(Copy of appointment order is annexed as Annexure "A").

2. That appellant performed her duties upto the entire satisfaction of their high-up's with full devotion and commitment and with the passage of time she is awarded with BPS-14 and now serving as SPST.
3. That earlier in the year 2019 the respondents proposed the appellant for promotion however appellant forgo her rights of promotion by submitting affidavit.
4. That the respondents issued a Notification bearing No. SO (Policy) E&AD/1-3/2020 dated: 06.06.2023 with the prayer by directing respondent Directorate Elementary & Secondary Education that rule 7 (5) in KP Civil Servant (AP&T) Rules, 1989 has been deleted vide notification dated:6/8/2020 & therefore no provision exist to declare or forgo promotion and it is obligatory upon every civil servants to accept promotion under every condition.
5. That Directorate of Elementary & Secondary Education KP also wrote letter to the office Establishment & Administrative Department to reconsider the amendment made in KP Civil Servant (AP&T) Rules, 1989 as it had negatively affected a large number of teachers and specially female teachers.

6. That respondents vide letter dated:07.09.2023 directed the Directorate and E&SE Education KP that necessary guidance has already been provided to the department and therefore, no provision exists to decline or forgo promotion and those teachers who do not comply with the promotion order of the competent authority or try to evade promotion through different means shall be proceeded under the KP Civil Servant (Efficiency & Discipline) Rules, 2011.
7. That the respondents also issued a letter & directed the appellant with other teachers that those teachers who have submitted their refusal are directed to submit their files for promotion complete in all respect to the office of DEO Charsadda to avail promotion.
8. That appellant is bitterly aggrieved from the letter dated 06.06.2023, 07.09.2023 ~~08.09.2023~~ 15.08.2024 being ill filed Departmental representation but with no result, hence this appeal on the following amongst other grounds:

G R O U N D S:

- A. That the appellant has not been treated in accordance with law and constitution of Islamic Republic of Pakistan 1973.

- B.** That the act of respondents is the violation of fundamental rights guaranteed by the constitution and Article 4, 29 and the impugned notification is clear violation & derogation of the Constitution.
- C.** That the constitution of Pakistan expressly states that no exploitation is to be carried out and the state shall ensure the elimination from all forms of exploitation and the gradual fulfillments of the fundamental principle from each according to his ability to each according to his work, however, the bare perusal of notification and deletion of rules 7 (5) in the KP Civil Servant (Appointment, Promotion & Transfer) rules, 1989 would reveal that the compulsory provision is against the norms of justice.
- D.** That the impugned notification and office order are in transgression of Section 9 of KP Civil Servant Act, 1973 read with Rule 7 of KP APT Rules, 1989.
- E.** That the impugned notification & deletion of Rules 7 (5) in the KP Civil Servant (AP&T) Rules, 1989 is against the principles of policy as the state is responsible to promote social and economic wellbeing of the people.

- F.** That state shall protect the legitimate interest and to protect the family however, the impugned notification and deletion Rule 7 (5) the KP Civil Servant put the female teacher in the great curse which is illegal unlawful and against the fundamental rights guaranteed in the Constitution of Pakistan 1973.
- G.** That the female teacher /appellant specifically suffer from the impugned notification at extreme as they cannot avail promotion with transfer to for flunk areas/hard areas therefore, appellant who is ill cannot be compelled to accept compulsory promotion which would not ultimately benefit to them.
- H.** That appellant has already forgo her promotion as she do not desire to avail the promotion, by submitting affidavit.
- I.** That it is settled principle of law and administration of justice that Government functionaries such as the respondents are supposed to act in aid of the people and work towards protecting the fundamental rights of the appellant rather than infringing upon in a malafide manner.

- J. That the act of respondents, for initiating the action is illegal, unlawful, fraudulent, malafide prejudicial, discriminatory and without lawful authority.
- K. That any other ground, not specifically mentioned, may be raised at the time of arguments, with the prior permission of this Hon'ble Tribunal.

It is, therefore, most humbly prayed On acceptance of the instant appeal, the impugned notification No.SO(Policy)E&AD/13/2020 dated: 06.06.2023 and office order No.45/7-21 dated 15.08.2024 may be declared as illegal, against the law ineffective upon the rights of the appellant & ordered to be struck down being void and ultra vires to the rules and rights of the appellant.

Any other relief deems fit and appropriate in the circumstances of the instant appeal may also be passed in favour of the appellant.

Through

Appellant

Shah Faisal Nasapi

Advocate

Supreme Court of Pakistan

Dated 27.09.2024

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

Service Appeal No. _____/2024

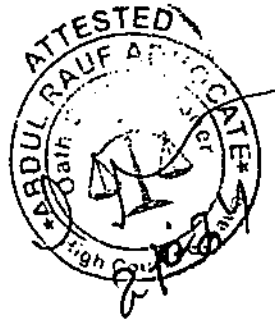
Mst. Humaira Bibi.....**Appellant**

VERSUS

The Secretary E& SE & others.....**Respondents**

AFFIDAVIT

I, Mst. Humaira Bibi Wife of Syed Waheed ur Rehman
(**SPST**) G.G.P.S Kaniwar Tehsil Tangi District Charsadda, do
hereby solemnly affirm and declare that the contents of the
accompanying **Service Appeal** are true and correct to the
best of my knowledge and belief and nothing has been
concealed from this Hon'ble Court.



Humaira Bibi

DEPONENT

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

Service Appeal No. _____/2024

Mst. Humaira Bibi.....Appellant

V E R S U S

The Secretary E& SE & others.....Respondents

ADDRESSES OF PARTIES

APPELLANT:

Mst. Humaira Bibi Wife of Syed Waheed ur Rehman (SPST)
G.G.P.S Kaniwar Tehsil Tangi District Charsadda

R E S P O N D E N T S

1. Govt of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education, Peshawar.
2. District Education Officer (DEO) District Charsadda
3. Secretary Establishment Government of Khyber Pakhtunkhwa, Peshawar
4. Directorate of Secondary & Elementary Education, Peshawar

Through Appellant

Shah Faisal Nasapi

Advocate

Supreme Court of Pakistan

Dated 27.09.2024

No.	Name/Address	Place of Birth	Age	Sex	Religion	Education	Occupation	Marital Status	Other
1	Zana Debra D/O Anwar Khan	India	21	F	Muslim	High School	Student	Single	
2	Lubna Debra D/O Johannez	India	20	F	Muslim	High School	Student	Single	
3	Ujala D/O Iqbal Mahomed	India	19	F	Muslim	High School	Student	Single	
4	Shahana Anwar D/O M. Anwar	India	18	F	Muslim	High School	Student	Single	
5	Salma Anwar D/O M. Anwar	India	17	F	Muslim	High School	Student	Single	
6	Mahmud Anwar D/O M. Anwar	India	16	M	Muslim	High School	Student	Single	
7	Ujala D/O M. Anwar	India	15	F	Muslim	High School	Student	Single	
8	Shahana Anwar D/O M. Anwar	India	14	F	Muslim	High School	Student	Single	
9	Salma Anwar D/O M. Anwar	India	13	F	Muslim	High School	Student	Single	
10	Mahmud Anwar D/O M. Anwar	India	12	M	Muslim	High School	Student	Single	
11	Ujala D/O M. Anwar	India	11	F	Muslim	High School	Student	Single	
12	Shahana Anwar D/O M. Anwar	India	10	F	Muslim	High School	Student	Single	
13	Salma Anwar D/O M. Anwar	India	9	F	Muslim	High School	Student	Single	
14	Mahmud Anwar D/O M. Anwar	India	8	M	Muslim	High School	Student	Single	
15	Ujala D/O M. Anwar	India	7	F	Muslim	High School	Student	Single	
16	Shahana Anwar D/O M. Anwar	India	6	F	Muslim	High School	Student	Single	
17	Salma Anwar D/O M. Anwar	India	5	F	Muslim	High School	Student	Single	
18	Mahmud Anwar D/O M. Anwar	India	4	M	Muslim	High School	Student	Single	
19	Ujala D/O M. Anwar	India	3	F	Muslim	High School	Student	Single	
20	Shahana Anwar D/O M. Anwar	India	2	F	Muslim	High School	Student	Single	

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Consequent upon the receipt of the Departmental Report, the following candidates are hereby appointed as per (a) of the order on the subject and the report is noted as per (b) of the order.

INVESTMENT ORDER

Amex A

10

OFFICE OF THE EXECUTIVE/DISTRICT EDUCATION DISTRICT CHARSAKDA

APPOINTMENT ORDER

Consequent upon the approval of the Departmental selection committee, the following candidates are hereby appointed as PST (F) BPS-09 on temporary basis against the vacant post as noted against each:

S.No.	Name/F/name /Address	Place of posting	Remarks
1	Raza Begum D/o Anwar Khan Village Ibad Khan Sheikho	GGPS ibad Khan Kili Sheikho	V. post
2	Lubna Begum D/o Jehanzeb Vill. Kas Korona Sherpao	GGPS Saifur Mian Kili Zaim	-do-
3	Ruqia D/o Ikram Mahmmod Islamabad No.1 Charsadda	GGPS Aga Bala Charsadda	-do-
4	Shahnaz Anwar D/o M. Anwar Maroof Khel Charsadda	GGPS Akhun Zadagan	-do-
5	Salma Naureen D/o M. Khan Vill Boobak Charsadda	GGPS Nisatta Charsadda	-do-
6	Madam Sumbal D/o Saud ur Rehman	GGPS Zarin Abad Charsadda	-do-
7	Bibi Fatima D/o Abdul Sattar Vill, Bara Zai Tangi	GGPS Ziam	-do-
8	Shabina D/o Wazir Ahmad Vill. Gul Abad Mera	GGPS M.M Khel No.1	-do-
9	Rifat Naz D/o Bakhtiar M. Vill. Barani Tangi	GGPS Ziam Marghan	-do-
10	Fozia D/o Wali Jan Vill. Rajjar	GGPS Mazara Hajzai	-do-
11	Riffat Haqqani D/o Fazali Haqqani Vill Umarzai	GGPS Yousaf Khan Kile Dhaki	-do-
12	Musarat Shaheen D/o Ajab Noor Vill. Utmanzai	GGPS Ocha Wala	-do-
13	Tamana Noor Begum D/o Inayat Vill. Prang Charsadda	GGPS Karkanra No.1 Kangra	-do-
14	Haleema Kalsoom D/o Aman Ullah Khan Vill. Dargai	GGPS Dulat Pura	-do-
15	Farakh Deebea D/o M. Roshan Vill. Kula Dhand Payan Umarzai	GGPS Kula Dhand Pyan	-do-
16	Seema Sahar D/o Hidayat Ullah Village Shabqadar Fort	GGPS Shabqadar Fort MC-2	do



Legible Copy

17	Uzam Ahmad D/o Ahmad Ali VIII. G.P.O Tangi	GGPS Bazar Garhi	-do-
18	Tauheed Saeed D/o Saeed Gul Vill. Harichand	GGPS Soor Kamar	-do-
19	Shah Naz Gul D/o Murad Gul Vill. Umarzai	GGPS Safo Bari Band	-do-
20	Uzma Begum D/o Mukamil Khan Vill. Tangi	GGPS Qamar Kila	-do-
21	Mehnaz Jehan D/o Ghani Ul Haq Vill. Dargai	GGPS hassan Zai	do
22	Bibi Fatima D/o Naushad Saffor Khel Prang	GGPS M.M Khel No.1	do
23	Alia Sultana D/o Fazli Malik Vill Turanzai	GGPS Nisatta	do
24	Shabana Gul D/o Noor Hussain Vill Utmanzai	GGPS Muslim Abad Ghanderi	do
25	Bushra Shaheen D/o Ashaf ud Din Vill. Tarnab Charsadda	GGPS M. M. Khel No.1	
26	Humera Bibi D/o Muhammad Haroon VIII. Tangi	GGPS Matta Palanzai M. M Khel	do
27	Ishrat Rahim D/o Bashir Ud din Vill. Papra Korona Charsadda	GGPS Tala Shah Ziam	do
28	Bibi Sadia Do Bashir Uddin Vill Papra Krona Charsadda	GGPS Monda SKF	do
29	Shazia Gul D/o Fazli Maula Village Charsadda	GGPS Mazara SKF	do
30	Farukh Naz Gul D/o Saif ur Rehman Vill. Charsadda	GGPS Umarzai	do
31	Vasia Begum D/o Ashraf Khan Vill. Kaula Dher	GGPS Gul Abad	
32	Asma Begum D/o Ziarat Khan Vill. Umarzai Charsadda	GGPS Qamar Khani Shodag	do
33	Rani Gul D/o Shams ur Rehman Vill. Utmanzai	GGPS M. M Khel No.1	
34	Tahira D/o Jehanzeb Village GPS Tangi	GGPS Mulsim Abad Gandari	do
35		GGPS Hisara Yasimzai	

UNION COUNSEL WISE MERIT

36	Shabana Gul Do Redi Gul Vill. Qazi Khel Jadeed	U/S MC-1 Chd.	GGPS Qazi Khel Jadeed	V.Post
37	Saeed D/o Samin Gul Vill Charsadda	-do-	-do-	-do-
37	Sumbal D/o Ujaz Husain Village Charsadda	U/C MC-4 CHd.	GGPS Umarabad	-do-



DEPUTY DISTRICT OFFICER
(F) PRIMARY EDUCATION TANGI

Copy to the:-
All the Head Mistress Concerned
Executive District Office (E & SE) Charsadda for approval in continuation
this office No. 2400, dated: 13.09.2008, and No. 2401, in the even date

Endst No. 9426-33 Dated. 23/08 2008

(Mst: SAMIN ROHI)
DEPUTY DISTRICT OFFICER
(F) PRIMARY EDUCATION TANGI

S:No	Name of School with surplus	Name of Teacher	Name of Nedy School	Adjustment	Staff
01	GGPS:Koi Baba	Miss:Salma Gul	GGPS:Mirza Dher	-do-	
		Miss:Kousar	GGPS:Kamwar	-do-	
		Miss:Najama	GGPS:Mirza Dher	-do-	
		Miss:Humaira Dibi	GGPS:Mirza Dher	-do-	
		Miss:Zahida	GGPS:Dildar Gathi	-do-	
		Miss:Samal Naz	GGPS:Ziam Kochain	-do-	
		Miss:Tasawar Khanum	GGMS:Zirai Killi	-do-	
		Miss:Kifayat	GGPS:Ghio Killi	-do-	
		Miss:Nagina Begum	GGPS:Marphan	-do-	
02	GGPS:Akhlar Abad No.1	Miss:Shamshad Begum	GGPS:Abazai	-do-	
		Miss:Rubi Fatima	GGPS:Min Killi Sheerpac	-do-	
		Miss:Fukhanda	GGPS:Zirai Killi	-do-	
03	GGPS:Akhlar Abad No.02	Miss:Shakela	GGPS:Mirza Dher	-do-	
		Miss:Rozina	GGPS:Mirza Dher	-do-	
		Miss:Robina	GGPS:Mirza Dher	-do-	
		Miss:Gul Sehra	GGPS:Mirza Dher	-do-	
		Miss:Saceda	GGPS:Mirza Dher	-do-	
		Miss:Nighai Saema	GGPS:Mirza Dher	-do-	
04	GGPS Qilla Tangi				
05	GGPS:No 1 Bara Zai				
06	GGPS:Barazai No.02				

The following Surplus staff of the following Schools are hereby adjusted in the nedy Schools as noted against their names. They are directed to take over charge immediately, and sent to this office

OFFICE ORDER

OFFICER OF THE DEPUTY DISTRICT OFFICER (FEMALE) PRIMARY EDUCATION TANGI

ATION OFFICER (FEMALE) CHARASADDA

11

Handwritten signatures and marks, including a large 'G' and 'B'.

OFFICE OF THE DEPUTY DISTRICT OFFICER (FEMALE) PRIMARY EDUCATION TANGI

OFFICE ORDER

The following surplus staff of the following schools are hereby adjusted in the needy schools as noted against their names. They are directed to take over charge immediately and sent to this office.

S#	Name of school with surplus staff	Name of teacher	Name of Needy School Adjustment
1	GGPS. Kot Bala	Miss Salma Gul	GGPS Abazai
		Miss Kousar	-do-
		Miss Najma	GGPS Mira Dher
		Miss Humaira Bibi	GGPS Kaniwar
2	GGPS. Akhtar Abad No.1	Miss Zahida	GGPS Mirza Dher
		Miss Sarwat Naz	GGPS Dildar Garhi
		Miss Tasawar Khanum	-do-
		Miss Kifayat	GGPS Ziam Kochain
		Miss Nagina Begum	-do-
3	GGPS. Akhtar Abad No.02	Miss Furkhana	GGCMS Zirat Killi
		Miss Bibi Fatima	GGPS Ghlo Killi
04	GGPS Qilla Tangi	Miss Shamsad Begum	GGPS Marghan
		Miss Shakeela	-do-
		Miss Rozina	GGPS Abazai
5	GGPS No.1 Bara Zai	Miss Robina	GGPS Mian Killi Sherpao
6	GGPS Barazai No.02	Miss Gul Sehra	GGPS Pirano Killi
		Miss Saeeda	-do-
		Miss Nighat Saeema	GGCMS Zirat Killi

MST. SAMIN ROHI
DEPUTY DISTRICT OFFICER
(F) PRIMARY EDUCATION TANGI

Endst. No.2426-33 dated 23/09/2008

Copy to the

1. All the Head Mistress concerned.
2. Executive District Office (E&SE) Charsadda for approval in continuation this office No.2400, dated 13.09.2008, and No.2401, in the even date

Sd/-
DEPUTY DISTRICT OFFICER
(F) PRIMARY EDUCATION TANGI

Dist. Govt. KP-Provincial
District Accounts Office Charsadda
Monthly Salary Statement (April-2023)

12



Personal Information of Miss HUMERA BIBI d/w/s of MUHAMMAD HAROON

Personnel Number: 00381839 CNIC: 1710266507076 NTN:
Date of Birth: 20.03.1976 Entry into Govt. Service: 22.05.2007 Length of Service: 15 Years 11 Months 010 Days

Employment Category: Vocational Temporary

Designation: SENIOR PRIMARY SCHOOL TEA 80001045-DISTRICT GOVERNMENT KHYBE
DDO Code: CA6021-DEPUTY DISTRICT OFFICER (FEMALE) PRIMARY EDUCATION TANGI CHARSADEA (REGULAR)
Payroll Section: 001 GPF Section: (001) Cash Center: 02
GPF A/C No: 381839 GPF Interest applied GPF Balance: 501,380.00 (provisional)
Vendor Number: -
Pay and Allowances: Pay scale: BPS For - 2022 Pay Scale Type: Civil BPS: 14 Pay Stage: 12

Wage type		Amount	Wage type		Amount
0001	Basic Pay	43,410.00	1001	House Rent Allowance 45%	3,321.00
1210	Convey Allowance 2005	2,856.00	1300	Medical Allowance	1,500.00
2148	15% Adhoc Relief All-2013	500.00	2199	Adhoc Relief Allow @10%	340.00
2316	Teaching Allowance 2021	3,036.00	2341	Dispr. Red All 15% 2022KP	4,208.00
2347	Adhoc Rel Al 15% 22(PS17)	4,208.00			0.00

Deductions - General

Wage type		Amount	Wage type		Amount
3014	GPF Subscription	-2,620.00	3501	Benevolent Fund	-1,200.00
3609	Income Tax	-251.00	3990	Emp.Edu. Fund KPK	-135.00
4004	R. Benefits & Death Comp:	-600.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
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Deductions - Income Tax

Payable: 3,796.18 Recovered till APR-2023: 2,348.04 Exempted:948.10 Recoverable: 500.08

Gross Pay (Rs.): 63,379.00 Deductions: (Rs.): -4,806.00 Net Pay: (Rs.): 58,573.00

Payee Name: HUMERA BIBI
Account Number: 1749-94
Bank Details: HABIB BANK LIMITED, 221799 TANGI, CHARSADEA, TANGI, CHARSADEA, CHARSADEA

Leaves: Opening Balance: Availed: Earned: Balance:

Permanent Address:
City: DXF Domicile: - Housing Status: No Official
Temp Address:
City: Email: humairabibipic@gmail.com

PAKISTAN National Identity Card

(13)

Name: Humaira Bibi

Registration Number: Syed Waheed U. Rahman

Gender: Male

Province: Punjab


Identity Number: 17102-6650707-6	Date of Birth: 20.03.1976
Date of Issue: 20.04.2017	Date of Expiry: 20.04.2017

14548

Holder's Signature

R

17102-6650707-6

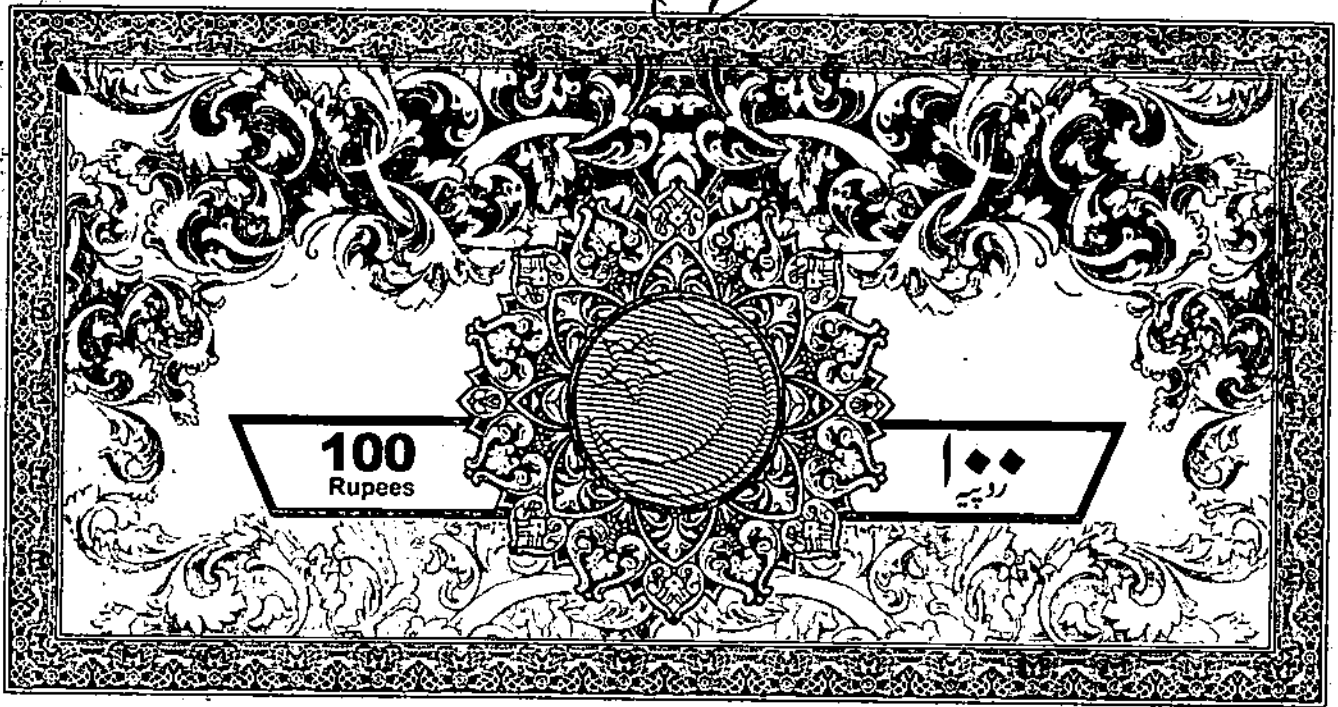


10141123435
119-76-123380

Ministry of Information & Public Relations
Government of Punjab

گشده کارڈ ملے پر قریبی ایڈریس میں ڈال دیں

14



بیان علی

مذکورہ بیان صیغہ میں زور سے لکھا گیا ہے۔ اس میں ۱۰۰ روپے کی رقم
 کی ہے۔ جو کہ غلطاً لکھی گئی ہے۔ اس میں ۱۰۰ روپے کی رقم لکھی گئی ہے۔
 اس کی جگہ ۱۰ روپے لکھی گئی ہے۔ اس میں ۱۰ روپے کی رقم لکھی گئی ہے۔
 اس میں ۱۵ روپے کی رقم لکھی گئی ہے۔ اس میں ۱۵ روپے کی رقم لکھی گئی ہے۔
 اس میں ۱۵ روپے کی رقم لکھی گئی ہے۔ اس میں ۱۵ روپے کی رقم لکھی گئی ہے۔
 اس میں ۱۵ روپے کی رقم لکھی گئی ہے۔ اس میں ۱۵ روپے کی رقم لکھی گئی ہے۔
 اس میں ۱۵ روپے کی رقم لکھی گئی ہے۔ اس میں ۱۵ روپے کی رقم لکھی گئی ہے۔
 اس میں ۱۵ روپے کی رقم لکھی گئی ہے۔ اس میں ۱۵ روپے کی رقم لکھی گئی ہے۔

17102-6650767-6

بیان علی

29/9/2021

Raka
 Head Mistress
 GGPS Kaniwar

Handed

WALIDAH LATIF
BRARY SECRETARY (POLICE)

ATTESTED



- 1. Additional Chief Secretary, Govt. of Khyber Pakhtunkhwa, Planning & Development Department, Khyber Pakhtunkhwa.
- 2. The Senior Member Board of Revenue, Khyber Pakhtunkhwa.
- 3. All Administrative Secretaries to Govt. of Khyber Pakhtunkhwa.
- 4. The Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
- 5. The Principal Secretary to Governor, Khyber Pakhtunkhwa.
- 6. All Divisional Commissioners in Khyber Pakhtunkhwa.
- 7. All Heads of Attached Departments in Khyber Pakhtunkhwa.
- 8. All Autonomous/Semi Autonomous Bodies in Khyber Pakhtunkhwa.
- 9. All Deputy Commissioners in Khyber Pakhtunkhwa.
- 10. The Registrar, Khyber Pakhtunkhwa Service Tribunal, Peshawar.
- 11. The Registrar, Khyber Pakhtunkhwa Public Service Commission, Peshawar.
- 12. The Secretary, Khyber Pakhtunkhwa Public Service Commission, Peshawar.
- 13. The Deputy Director (IT), E&A Department.
- 14. All Section Officers in Establishment & Administration Department with the request to The Section Officer (Admn), Administration Department.
- 15. The Section Officer (Admn), Administration Department.
- 16. The Chief Clerk, Administration Department.

CHIEF SECRETARY
GOVERNMENT OF THE KHYBER PAKHTUNKHWA

EXIST. NO & EVEN DATE

In rule 7, sub-rule (5) shall be deleted.

AMENDMENT

Dated Peshawar the 05/08/2020.

In exercise of the powers conferred by section 26 of the Khyber Pakhtunkhwa Civil Servants Act No. XVII of 1973 (Khyber Pakhtunkhwa) is pleased to direct that in the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the following further amendment shall be made, namely:

NOTIFICATION

GOVERNMENT OF
KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
(REGULATION-WING)



Handwritten signature or initials.

15

Annex C

**GOVERNMENT OF
KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
(REGULATION WING)**

15A

NOTIFICATION

Dated Peshawar the, 06/8/2020.

No: SUB.Policy E&AD/1-3/2020: In exercise of the powers conferred by Section 26 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No.XVIII) the Chief Minister of Khyber Pakhtunkhwa is pleased to direct that in the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 the following further amendment shall be made, namely: of

AMENDMENT

In rule 7, sub-rule (5) shall be deleted.

**CHIEF SECRETARY
GOVERNMENT OF THE KHYBER PAKHTUNKHWA**

ENDST: NO & EVEN DATE

Copy is forwarded to:-

1. Additional Chief Secretary, Govt. of Khyber Pakhtunkhwa, Planning & Development Department
2. The Senior Member Board of Revenue, Khyber Pakhtunkhwa.
3. All Administrative Secretaries to Govt. of Khyber Pakhtunkhwa.
4. The Principal Secretary to Governor, Khyber Pakhtunkhwa,
5. The Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
6. All Divisional Commissioners in Khyber Pakhtunkhwa.
7. All Heads of Attached Departments in Khyber Pakhtunkhwa.
8. All Autonomous/Semi Autonomous Bodies in Khyber Pakhtunkhwa.
9. All Deputy Commissioners in Khyber Pakhtunkhwa.
10. The Registrar Peshawar High Court, Peshawar.
11. The Registrar, Khyber Pakhtunkhwa Service Tribunal, Peshawar.
12. The Secretary, Khyber Pakhtunkhwa Public Service Commission, Peshawar.
13. The Deputy Director (IT), E&A Department.
14. All the Section Officers in Establishment & Administration Department
15. The Section Officer (Admn), Administration Department with the request to arrange 20 gazette copies.
16. The caretaker, Administration Department

Sd/-
**WARDAH LATIF
DEPUTY SECRETARY (POLICY)**

11/11/73
M. K. S. S.

RECEIVED

1. 75 to Special Security (Reg. Establishment Department)
2. 74 to Additional Security (Reg. in Establishment Department)
3. 75 to Deputy Secretary (Reg. Establishment Department)

South Africa (Policy)

Ann. Ministry (Policy)

Copy forwarded to the
Ruler, of even No & date

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2/6

2011, these:

proceeded against higher positions Civil Service (Efficiency & Discipline) Rules of the competent authority, or to evade promotion through different means shall be Furthermore, these officials who do not comply with promotion order shall revert to except promotion to every position to which higher responsibilities in terms of promotion. Therefore, it is obligatory upon every person who is lead to large promotion to create positions in order to avoid lack of capacity (will) revert from temporary to create positions or show lack of capacity.

The basic rationale behind the rotation of officials who is aimed at preventing a rotation ends to decline or large promotion.

1989 ends dated with list dependent reflective dated 08/05/1989, no (3) of Rule 7 of Higher Positions Civil Service (Appointment, Promotion and Transfer) Memorandum dated 14/03/1989 on the subject noted above and to state that Sub-Rule 1 will direct to refer to your letter No. SGP/1989/177/2/1989.

THE GOVERNMENT OF KENYA
The Secretary & Secretary General Department
Subject: -
MEMORANDUM DATED 14/03/1989 ON THE SUBJECT NOTED ABOVE AND TO STATE THAT SUB-RULE 1 (3) OF RULE 7 OF HIGHER POSITIONS CIVIL SERVICE (APPOINTMENT, PROMOTION AND TRANSFER) MEMORANDUM DATED 08/05/1989, NO. SGP/1989/177/2/1989, WILL DIRECT TO REFER TO YOUR LETTER NO. SGP/1989/177/2/1989.

34

GOVERNMENT OF KENYA
ESTABLISHMENT DEPARTMENT
No. SGP/1989/177/2/1989
Total Release on the date 04.03.89



16

**GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT**

Dated Peshawar the Jan 06 2023

To

**The Government of Khyber Pakhtunkhwa
Elementary & Secondary Education Department**

Subject: **GUIDANCE REGARDING DELETION OF RULE 7 (5) IN THE KHYBER
PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT, PROMOTION
AND TRANSFER) RULE, 1989**

Dear Sir,

I am directed to refer to your letter No.SD(Primary-M/E&SED2-2/Appointment-Rule/2023 dated 18.04.2023 on the subject noted above and to state that sub Rule (5) of Rule-7 of Khyber Pakhtunkhwa Civil Servant (Appointment, Promotion and transfer) rule, 1989 stands deleted vide this department notification dated 06.08.2020 thus, no provision exists to decline or forgo promotion.

The basic rationale behind the deletion of the ibid rule is aimed to preventing in civil servant from termination for illicit gain by sticking to "a single lucrative post/position or to prevent those who tend to forgo promotion to evade post/transfer or show lack of capacity to tackle higher responsibilities in case of promotion, therefore, it is obligatory upon every civil servant to accept promotion in every condition.

3 Furthermore, these officer /officials who do not comply with promotion order of the competent authority or ~~fail~~ to evade promotion through different means shall be proceeded against under Khyber Pakhtunkhwa Civil Servants (Efficiency & Discipline) Rules, 2011, please.

Yours faithfully

Sd-

Issa Muhammad Khan
Section Officer (Policy)

Endst. Of even NO & Date

Copy forwarded to the:-

1. PS to Special Secretary (Reg), Establishment Department.
2. PA to Additional Secretary (Reg-II), Establishment Department.
3. PS to Deputy Secretary (Policy), Establishment Department.

Sd/-

Section Officer (Policy)

17

MINUTES OF THE MEETING REGARDING APPLICATION SUBMITTED BY MR AZIZ ULLAH PROVINCIAL PRESIDENT ALL PRIMARY TEACHERS ASSOCIATION KHYBER PAKHTUNKHWA REGARDING OF DELETION OF RULE 7(5) IN THE CIVIL SERVANT (APPOINTMENT, PROMOTION & TRANSFER RULES 1989).

A meeting regarding the subject matter was held on 06-07-2023 at 11:00 AM under the Chairmanship of Additional Secretary Establishment in his office. The following attended the meeting

S#	NAME	DESIGNATION
1.	Mr. Fazal Wahid	Deputy Director Establishment of Directorate Elementary & Secondary Education Department.
2.	Mr. Aziz Ullah	Provincial President All Primary Teachers Association: Khyber Pakhtunkhwa
3.	Mr. Razaqat Ullah	General Secretary APTA Peshawar
4.	Muhammad Ishaq	Section Officer (Primary) E&SE Department Civil Secretariat Khyber Pakhtunkhwa Peshawar

2. The meeting started with recitation from The Holy Quran. The chair welcomed the participants. The Deputy Director (Establishment) of Directorate of Elementary & Secondary Education briefed the forum regarding agenda item in detail.

3. After threadbare discussion it was decided that Directorate of Elementary & Secondary Education Department may examine the case properly and submit & self-contained/consolidated case for onward submission to Establishment Department for further necessary action.

The meeting ended with a vote of thanks from the Chair.

(Mr. Fazal Wahid)
Deputy Director-1
E&SE Department

Provincial President
All Primary Teachers Association
Khyber Pakhtunkhwa

(Mr. Razaqat Ullah)
General Secretary APTA
Peshawar

(Muhammad Ishaq)
Section Officer (Primary-Male)
E&SE Department

ATTESTED

(Abdullah)

Additional Secretary (Establishment)

WP 4442-2023 AZIZ ULLAH VS GOVT CP PG 43

18

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION, KPK

To:

Section Officer (Primary-Male)
Elementary & Secondary Education Department
KPK, Peshawar.

PESHAWAR
(21-7-2023)

Subject: Minutes of Meeting

Dear Sir, I am directed to refer to letter No. (SO Primary-M) E&SED/5-1/62124/
Minutes of meeting/PST/2023 dated 30-7-2023 on subject cited above and to
present brief history about background of case as under:

- That Government of KP Establishment department (Regulation Wing) deleted rule 7(S) in Civil Servants (Appointment, promotion, Transfer, Rule-1987) vide notification No. No. SDR-VI (E&AD) 1-3/2020 dated 06-08-2020.
- That this office sought guidance from your good office in the following words vide letter No. 6987 dated 06-09-2023:
 - (i) Now it is obligatory upon civil servant to accept promotion.
 - (ii) It is prerogative of civil servant to either accept/turn down the offer of promotion.
- That your good office forwarded the same to quanta concerned vide letter No. SO (Primary-M) E&SED/2-2/Appointment-1/2023 for necessary guidance.
- That the government of KP-ED (Regulation Wing) vide letter No. SO (Policy) E&AD/1-3/2020 dated 6-06-2023 categorically stated that there exists no provision to decline/forgo promotion. It is obligatory upon every civil servant to accept promotion under every condition.
- That in light of the minutes of the meeting dated 6-09-2023 held under the Chairmanship of Hon. Additional Secretary, Establishment at his office. This office has been asked for submission of consolidated case.

In view of the above, this office is of considered opinion that the deletion of Rules 7(S) have affected negatively a huge members of female teachers.

The case is submitted for perusal and necessary actions please.

Copy of the above to;

1. PA to Director Local Directorate
2. Master Copy

TESTED

Assistant Director
Elementary & Secondary Education
Khyber Pakhtunkhwa.



ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
CIVIL SECRETARIAT PESHAWAR
(Phone No.091-9223587)

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F

No. SO(Primary-M)E&SED/2-2/Appointment-Rule /2023
Peshawar Dated 23rd August, 2023

The Secretary to Govt. of Khyber Pakhtunkhwa,
Establishment & Administration Department,
Peshawar.

**SUBJECT: - GUIDANCE REGARDING DELETION OF RULE 7(5) IN THE CIVIL
SERVANT (APPOINTMENT, PROMOTION & TRANSFER RULES
1989).**

Dear Sir,

I am directed to refer to your letter No. SO(Policy)/ EBAD/ 1-3/2020 dated 05th June 2023 and to state that after deletion of rule 7(5) Khyber Pakhtunkhwa Civil Servant (Appointment, Promotion & Transfer Rules 1989) it has been intimated that those officers/ officials who do not comply with promotion order of the competent authority or try to evade promotion through different means shall be processed under Khyber Pakhtunkhwa Civil Servant (Efficiency & Discipline) Rules, 2011.

2. In this connection it is submitted that in some cases lady teacher of primary level who avail such promotions have to face serious inconvenience while they have to perform duties in the remotest station with no residential or transport facility. Most of them are married with kids and elder father of mother-in-law who need care. In such cases, there are negative effects on service delivery.

3. In view of the above, the said amendment may be reconsidered to the extent of lady teacher in primary schools.

(MUHAMMAD ISHAQ)
SECTION OFFICER (PRIMARY MALE)

Copy forwarded to the:

1. Director E&SE Khyber Pakhtunkhwa.
2. PS to Secretary, E&SE Department Khyber Pakhtunkhwa.

(Signature)
SECTION OFFICER (PRIMARY MALE)
23/8/23

ATTESTED

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GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
No. SO(Policy)E&AD/1-3/2020
Dated Peshawar the September 07, 2023

To
The Secretary to Government of Khyber Pakhtunkhwa,
Elementary & Secondary Education Department.

Subject: - GUIDANCE REGARDING DELETION OF RULE 7(5) IN THE
KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT,
PROMOTION AND TRANSFER) RULES, 1989.

Dear Sir,
I am directed to refer to your letter No. SO(Primary-M)/E&SED/2-
2/Appointment-Rule/2023 dated 23.08.2023 on the subject noted above and to state that
necessary guidance has already been tendered to your good office vide this department letter of
even No. dated 06.06.2023 (copy enclosed).

Yours faithfully,

Section Officer (Policy)

Encl. Of even No & date

Copy forwarded to the:-

1. PS to Special Secretary (Reg), Establishment Department.
2. PA to Additional Secretary (Reg-II), Establishment Department.
3. PS to Deputy Secretary (Policy), Establishment Department.

ATTES TED

Amir D

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GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
No. SO(Policy)E&AD/1-3/2020
Dated Peshawar the September 07, 2023

To

The Secretary to Government of Khyber Pakhtunkhwa,
Elementary & Secondary Education Department.

Subject - GUIDANCE REGARDING DELETION OF RULE 7(S) IN THE
KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT,
PROMOTION AND TRANSFER) RULES, 1989.

Dear Sir:

I am directed to refer to your letter No. SO(Primary-M)/E&SED/2-2/Appointment-
Rule/2023 dated 23.08.2023 on the subject noted above and to state that necessary
guidance has already been tendered to your good office vide this department letter of even
No. dated 06.06.2023 (copy enclosed).

Yours faithfully,

Section Officer (Policy)

Endst. Of even No & date

Copy forwarded to the:-

1. PS to Special Secretary (Reg), Establishment Department.
2. PA to Additional Secretary (Reg-II), Establishment Department.
3. PS to Deputy Secretary (Policy), Establishment Department.

ALISTED

Section nicer (Policy)

Khyber Pakhtunkhwa

Ali Ullah Khan
Probandi:
033-0474648
azizullah1973@gmail.com
CF Sptakph:



57

APTA House:
Govt. Primary School No.4,
Gulshah Peshawar City.

آل پرائمری ٹیچرز ایسوسی ایشن (اچٹا) خیبر پختونخوا

عناوین: میکلری ویلز کی 5 سکولز کی ایجوکیشن ٹیچرز ایسوسی ایشن
عناوین: آل پرائمری ٹیچرز ایسوسی ایشن خیبر پختونخوا
جناب مال

گزارش ہے کہ پروسٹروٹور لٹا سے میں نے یہ ہے کہ سرکاری ملازم کی خواہش میں ہے پروسٹروٹور ایک قانون ہوا کرتا تھا کہ جو ملازم ایک اگر کسی
جو کسی وقت ایک دن پروسٹروٹور میں تو وہ پھر آسکر پاد سال تک پروسٹروٹور میں لے جیتے سے طلب پاد سال تک برہاں کی پروسٹروٹور میں اس وقت ہی
پھر اس قانون میں تھوڑی رعایت دی گئی پاد سال وہی پتہ ہم کو دیا کہ اگر ایک ملازم ایک سال پروسٹروٹور میں تو دوسرے سال لے سکتا ہے
لیکن اب ایک ہفتہ پہلے ایک اور نوٹیفکیشن ہوا ہے

میں نے مطالبہ کیا ہے کہ تمام پروسٹروٹور ختم ہوں گے اگر نہیں ہوں گے تو اس کے خلاف ایسا ہی دلائل کے مطابق کاویا کرنے کا کہا گیا ہے
دعا ہے کہ ایسی نوٹیفکیشن جاری نہائی جن کو کی مکمل خلاف ہوگا ہے سب کے کا وہ دلا اور پڑی باتوں میں تاسی کہ خواہیں ہانکہ کہ انہاں مشکلات کا
سامنا کرنے کا

ایک عام حالت میں بھی زبردستی پروسٹروٹور اور وہ دلا۔ ہمیں بھی جاری انسانی حقوق کی خلاف ہوگا ہے کہ جو کہ غیر پختونوا میں بہت سے ناہوئی رہنمائی
میں ہوتا ہے ایسے حالات میں یہ ناہوئی نوٹیفکیشن جو E&SB کی کاویا اس لیکر کی جواب میں کیا گیا ہے جو بدگنا اور بڑی انسانی حقوق کی خلاف ہے
میں اس کے خلاف قانونی پادہاں کرنا میں کوئی حوصلہ رکھتا ہوں

ہذا ہم آپ سے درخواست کرتے ہیں کہ نوٹیفکیشن کو واپس لیا جائے یا اس میں ترمیم کر کے پرائمری ہانکہ کو (Relaxation) دیا جائے اور اس کا
زبردستی پروسٹروٹور لینے کی بجائے اس کو ختم سے لے لیا جائے
اور پروسٹروٹور لینے کا صورت میں ہانکہ پاد لیا جائے لیکن یہ زبردستی دیا جائے

اس سلسلے میں آپ پادہاں جلد تمام (DEOs) کو ای او ایڈ کے ایک خصوصی مراسلہ جاری کیا جائے تاکہ انہاں میں آپ کی ایسوسی ایشن پرائمری ہانکہ کو ذہنی
البتہ اور ہر جگہ سے پھیلا جائے

کہ جو نوٹیفکیشن جاری ہوتے ہی پرائمری ہانکہ کو ذہنی طور پر ہرج کر کے اس سلسلہ شروع ہو چکا ہے
ہذا ہم یہ درخواست کرتے ہیں کہ آپ صاحبان کو ایسی نوٹیفکیشن لے کر سب بزرگے پرائمری ہانکہ کو خصوصی ایسوسی ایشن پرائمری ہانکہ کو اس ذہنی البتہ سے نجات دلائی گئی

ATTESTED

شکریہ
08/11/23

عزیز اللہ خان سہیل صدر
آل پرائمری ٹیچرز ایسوسی ایشن خیبر پختونخوا

23

Amr E



Office of the District Education Officer Female
District Charsadda

☎ 091-9220486 ✉ emischarsadda.deo@yaho.com
No. 4617-21/ Dated 15 / 8 / 2024

To / All the SDEO(s) (Female) in District Charsadda.

Subject: REFUSAL REGARDING PROMOTION

Memo: I am directed to refer to the subject cited above and to state that in light of Govt of Khyber Pakhtunkhwa, Establishment department Notification No. SO(policy)E&A/D/1-3/2020 dated Peshawar the June 06,2023 and verbal direction from the August Directorate of E&SE Khyber Pakhtunkhwa, it is obligatory upon every civil servant to accept promotion in every condition and those civil servants who forgo promotion shall be proceeded against under Khyber Pakhtunkhwa Civil servants (Efficiency & Discipline) Rules, 2011, please.

2. Those teachers who have submitted their refusals, are directed to submit their files for promotion, complete in all respect to the office of the undersigned to avail promotion.

[Signature]
DISTRICT EDUCATION OFFICER
FEMALE CHARSADDA

C.M.C
[Signature]
[Signature]

Encls: No. _____

- Copy forwarded for information to the:-
1. P.A. to Director E&SE Department Khyber Pakhtunkhwa, Peshawar.
 2. P.A. to Deputy Commissioner Charsadda.
 3. District Monitoring Officer (EMA) Charsadda.
 4. DEO (Male) Charsadda.
 5. Office File.

[Signature]
DISTRICT EDUCATION OFFICER
FEMALE CHARSADDA

محفوظہ دستاویز سیکرٹری ہائیمبردی اینڈ سٹینڈرڈ ایگریکلچرل انڈسٹری ڈیولپمنٹ بورڈ

Anex F

عنوان: حکمانہ لکچر =

صنایعی

سائبرجسٹریڈل زائرس کرتی ہے۔ سائبرجسٹریڈل کے ذریعہ
 میں پروڈکشن کے لئے کھلی ہوئی زمین سے ایک درخواست لکھی ہے کہ
 وہ دنیا کی پروڈکشن forgo کرتی ہے۔ اور پروڈکشن کے
 لئے تیار ہے۔ حکم ہذا کے علم صادر ہوا ہے جو 6 جولائی
 2023 کو جاری شدہ ہے۔ سائبرجسٹریڈل کو پہلے ہی
 درخواست مع بیان طرفی ہے کہ وہ پروڈکشن کے لئے
 کھلی تیار ہے۔ اور یہ waive کرتی ہے جو
 حکم 6/6/23 کے تحت قانونی اور سیاہی حقوق کے
 خلاف ہے۔ جس سے سائبرجسٹریڈل کے حقوق کا ابطال
 ہو گیا ہے۔ درج بالا حکم کے تحت سائبرجسٹریڈل کے
 پروڈکشن کے لئے زمین کا زوننگ کا حکم لکھی گیا ہے
 یہاں ہی قانون کی خلاف ورزی ہے۔

اسد علی ہے کہ حکم جو 6/6/2023 کو درج کیا گیا ہے
 سائبرجسٹریڈل کے خلاف ہے۔ اور سائبرجسٹریڈل کے درخواست
 کے لئے waive کرنے پر پروڈکشن کو متاثر نہیں کیا گیا ہے۔

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Handwritten signature

11/06/2024

SPST کینور

