


# FORM OF ORDER SHEET

Court of \_\_\_\_\_

**Appeal No.** 2098/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	23/10/2024	<p>The appeal of Mst. Ishrat Bibi presented today by Mr. Kabir Ullah Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 28.10.2024. 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 \_\_\_\_\_ /2024

Mst ishrat Bibi                      VERSUS      Director E&SE & others  
\_\_\_\_\_

**APPLICATION FOR FIXATION THE INSTANT  
APPEAL BEFORE THE PRINCIPAL SEAT  
PESHAWAR INSTEAD OF CAMP COURT  
ABBOTTABAD.**

**Respectfully Sheweth:**

1. That the applicant is going to file the above titled service appeal before this Hon' able Service Tribunal Khyber Pakhtunkhwa Peshawar in which no date has yet been fixed.
2. That the respondent No 1 as well as counsel for the appellant belongs to district Peshawar.
3. That there is no legal bar for acceptance of the instant application.

It is therefore most humbly prayed that on acceptance of this application, the above titled service appeal may kindly be fixed before the principal seat Peshawar instead of Camp court Abbottabad.

  
APPELLANT

Through

  
Roeeda Khan

Advocate High Court Peshawar

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

Appeal No. 2098 of 2024

Mst. Ishrat D/o Umar Khitab working as a PST BPS-12 at Government Girls Primary School Kangra No. 2 Tehsil and District Haripur.

..... Appellant

**VERSUS**

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.

2. District education officer (Female) Haripur

..... Respondents

**INDEX**

S.No.	Description of documents	Annexure	Pages
1.	Memo of Appeal		1-5
2.	Application for Suspension application		6-7
3.	Affidavit		8
4.	Copy of corrigendum order	A	9
5.	Copy of orders are attached	B&C	10-11
6.	Copy of nationalization order dated 15.08.2024	D	12-13
7.	Copy of impugned transfer order dated 14.09.2024	E	14-16
8.	Copy of charge report 28.09.2024.	F	17
9.	Copy of Departmental appeal dated 16.09.2024	G	18-19
10	Copy of rejection order dated 03.10.2024	H	20
11.	Wakalat Nama	I	21

Dated 23.10.2024

  
Appellant

Through

**Kabir Ullah Khattak**  
Advocate, High Court,  
Peshawar

①

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

Appeal No. 2098 of 2024

Mst. Ishrat D/o Umar Khitab working as a PST BPS-12 at Government  
Girls Primary School, Kangra No. 2 Tehsil and District Haripur  
..... Appellant

**VERSUS**

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa  
Peshawar.
2. District education officer (Female) Haripur  
..... Respondents

**APPEAL UNDER SECTION 4 OF THE KPK SERVICE  
TRIBUNAL ACT, 1974, AGAINST THE PRE-MATURE  
IMPUGNED TRANSFER ORDER DATED 14/09/2024  
PASSED BY RESPONDENT NO 2 WHERE BY THE  
APPELLANT WAS TRANSFERRED FROM GGCMS  
KANGRA NO. 2 TO GGPS ZIARAT BELA AGAINST  
WHICH THE APPELLANT FILED DEPARTMENTAL  
APPEAL ON 16.09.2024 WHICH WAS REJECTED ON  
03.10.2024 ON NO GOOD GROUNDS.**

**PRAYER:**

On acceptance of the instant Service Appeal the  
premature impugned order dated 14/09/2024 to the  
extent of the appellant may kindly be set aside and  
the transfer / posted order dated 15.08.2024 may  
kindly be retained in favor of the appellant.

**Respectfully Sheweth:**

**FACTS**

The appellant respectfully submits as under:

- 1) That the appellant was initially appointed as PST  
against the vacant post at GGPS Gujratian vide  
appointment order dated 14.04.2020 and after  
appointment the appellant performed her official duty

2

with full and hard work and no complaint whatsoever was made against the appellant.

- 2) That after that the appellant was transferred through corrigendum dated 15.04.2020 against the vacant post at GGPS Singa. (Copy of corrigendum order is attached as annexure-A).
- 3) That the Government of KPK regularized the service of the appellant vide notification dated 24.12.2022.
- 4) That on regularization the service of the appellant was transferred from GGPS Singa to GGPS Qazian vide order dated 05.06.2023. It is pertinent to mention here, that again a corrigendum order was issued whereby GGPS Qazian Haripur is read as GGPS Model Town Haripur. (Copy of orders are attached as Annexure-B & C).
- 5) That the service of the appellant was again transferred from Government Girls Primary School Model Town to GGCMS Kangra Haripur nationalization vide order dated 15.08.2024. (Copy of nationalization order dated 15.08.2024 is attached as annexure-D).
- 6) That on 14.09.2024 the impugned premature order was issued whereby the appellant was transferred from Government Girls Primary School Kangra No. 2 to Government Girls Primary School Ziarat Bela Tehsil Ghazi District Haripur. (Copy of impugned transfer order is attached as annexure-E).

3

- 7) That the appellant was submitted charge report under protest at GGPS Ziarat Bela Tehsil Ghazi District Haripur on 28.09.2024. (Copy of charge report 28.09.2024 is attached as annexure-F).
- 8) That feeling aggrieved from the impugned order dated 14.09.2024 the appellant submitted Departmental appeal on 16.09.2024 which was not responded by the respondent department thereafter the appellant filed writ petition 991-A/2024 which was withdrawn on 25.09.2024 whereby the respondent No 1 is directed to decided Departmental appeal of the appellant within ten days positively. (Copy of Departmental appeal dated 16.09.2024 is attached as annexure-G).
- 9) That on 03.10.2024 the Departmental appeal dated 16.09.2024 of the appellant was rejected on no good grounds. (Copy of rejection order is attached as annexure-H).
- 10) That the appellant along with family have a blood enmity and that's why the appellant was lodge an FIR No. 30, dated 07.12.2011 U/S 302 PPC, Police Station Nara Amazai District Haripur was registered against the opponent accused namely Ayub S/o Sher Bahader whereby Aunt of the appellant was killed by the above mention accused and that facts has already been brought by the appellant in the knowledge of his high-ups and properly submitted an application to the

4

Deputy Commissioner District Haripur for that very purpose.

- i1) That feeling aggrieved the appellant prepares the instant service appeal before this Hon' able Tribunal inter alia on the following grounds:-

**GROUND**

- A. That the appellant was not treated in accordance with law and rules hence her rights secured and granted under the constitution of 1973 were badly violated.
- B. That the impugned premature transfer order dated 14.09.2024 is illegal, unlawful, unconstitutional and was passed against the transfer posting policy hence may be liable for setting aside.
- C. That the appellant was not treated by the respondent department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution Islamic Republic of Pakistan 1973.
- D. That the appellant is an unmarried Lady and resident of Haripur so, transfer of appellant, out of district is against the law, rules, policy and according to Supreme Court judgment and Judgment of this Hon' able Tribunal. Furthermore appellant also shall not be transferred on humanitarian so the impugned order is liable to be set aside.

5

- E. That according to transfer posting policy, normal tenure for posting is two years, but the appellant transfer order was passed before completion of normal tenure, which is total violation of Government transfer posting policy. Thus the impugned transfer is liable to be set aside on this Court alone.
- F. That the impugned transfer has neither been in the best interest of public service nor the exigencies of service, hence, not tenable and liable to be set aside.
- G. That there is no illegality on part of the appellant.
- H. That any other grounds will be raised at the time of arguments with prior permission of this Hon' able Tribunal.

It is therefore most humbly prayed that on acceptance of the instant Service Appeal the premature impugned transfer order dated 14/09/2024 to the extent of the appellant may kindly be set aside and the transfer / posted order dated 15.08.2024 may kindly be retained in favor of the appellant.

Any other remedy which this august tribunal deems fit that may also onward granted in favor of appellant.

Dated 23.10.2024

Through

  
Appellant

  
Kabir Ullah Khattak

&

  
Roeda Khan

Advocates, High Court,  
Peshawar.



6

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

Appeal No. \_\_\_\_\_ of 2024

Mst. Ishrat D/o Umar Khitab working as a PST BPS-12 at Government Girls Primary School Kangra No. 2 Tehsil and District Haripur.

..... Appellant

**VERSUS**

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District education officer (Female) Haripur

..... Respondents

**APPLICATION FOR SUSPENSION OF THE**  
**IMPUGNED PREMATURE CORRIGENDUM**  
**TRANSFER ORDER DATED 14/09/2024**  
**WHEREBY THE APPELLANT WAS**  
**TRANSFERRED FROM GHSS GGCMS**  
**KANGRA NO 2 TO GGPS ZIARAT BAILA.**

**Respectfully Sheweth:**

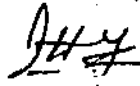
- 1) That the petitioner is failing the accompanying appeal, the contents of which may graciously considered as integral part and parcel of the instant petition.
- 2) That prima facie case exist in favor of the Petitioner.
- 3) That if the impugned notification as mention above as not suspended the Petitioner will suffer irreparable loss.
- 4) That the balance of convenience is also lies in favor of the Petitioner and her quite sanguine of his success.

- 7
- 4) That the balance of convenience is also lies in favor of the Petitioner and her quite sanguine of his success.
  - 5) That in the given circumstances the suspension of operation of the impugned notifications are indispension.

It is therefore to most humbly prayed that on acceptance of the instant petition the operation of the impugned notification for as mention above may kindly be suspended till the final disposal of the accompanying appeal.

Any other relief not specifically asked for may also graciously be extended in favor of the Petitioner in the circumstances of the case.


Dated 23.10.2024

  
Petitioner /Appellant

Through

  
Kabir Ullah Khattak

&

  
Rooeda Khan  
Advocate, High Court  
Peshawar

8

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

Appeal No. \_\_\_\_\_ of 2024

Mst. Ishrat D/o Umar Khitab working as a PST BPS-12 at Government  
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..... Appellant

**VERSUS**

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa  
Peshawar.

2. District education officer (Female) Haripur

..... Respondents

**AFFIDAVIT**

I, Mst. Ishrat D/o Umar Khitab working as a PST BPS-12 at  
Government Girls Primary School Kangra No. 2 Tehsil and District  
Haripur do hereby solemnly affirm and declare on oath that the content  
of the above application are true and correct to the best of my  
knowledge and belief and nothing has been kept secret and concealed  
from this Hon'ble Tribunal.

  
DEPONENT

9

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

Appeal No. \_\_\_\_\_ of 2024

Mst. Ishrat D/o Umar Khitab working as a PST BPS-12 at Government  
Girls Primary School Kangra No. 2 Tehsil and District Haripur

..... Appellant

**VERSUS**

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa  
Peshawar.

2. District education officer (Female) Haripur

..... Respondents

**ADDRESSES OF THE PARTIES**

**Petitioner**

Mst. Ishrat D/o Umar Khitab working as a PST BPS-12 at Government  
Girls Primary School Kangra No. 2 Tehsil and District Haripur

**Respondents**


1. Director Elementary & Secondary Education Khyber Pakhtunkhwa  
Peshawar.

2. District education officer (Female) Haripur.

  
Appellant

Through

  
Kabir Ullah Khattak

  
&  
Rooeda Khan

Advocate, High Court,  
Peshawar.

Anwar (A)

9

17

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) HARIPUR

Office Phone No. 0095-070154, Email: emis@haripur.gov.pk

Corrigendum

Please read the Name of School in respect of the following appointment order issued in the appointment order issued vide this office. Encls. No. 13528-35/DEO (F)/HRP/Ed/PSF (F)/Corrigendum (P.A.) dt/2020 Dated: 14/04/2020, in the best interest of public service.

Sl. No.	Serial No.	Name	UC	Name of School	
				Instead of	Read As
1	2	Saba Ghafour	Bait Gali	GGPS Najab Pur Gab	GGPS Gujartian
2	3	Umar	Bait Gali	GGPS Gujartian	GGPS Singa
3	4	Anisa Zaib	Bait Gali	GGPS Singa	GGPS Najab Pur Gab
4	13	Aysha Nisar	Khar Bara	GGPS Paki Bara	GGPS Mohi Edulha
5	18	Rukhsana	Kotehra	GGPS Bahad	GGPS Tarchutti
6	22	Naila Khanizaban	Kotehra	GGPS Tarchutti	GGPS Bahad

*Anwar (A)*  
District Education Officer (Female)  
Haripur  
Date: 15/04/2020

Encls. No. 13528-35/DEO (F)/HRP/Ed/PSF (F)/Corrigendum

- Copy to:
- The Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar
  - The Deputy Commissioner, Haripur.
  - The District Accounts Officer, Haripur.
  - The Medical Superintendent, DHQ, Haripur
  - The DMO Edu Department, Haripur.
  - PS to Secretary, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
  - The SDEO (Female), Ghazi.
  - All the Head Teachers Concerned.
  - All Teachers concerned.
  - Office Record File.

*Anwar (A)*  
District Education Officer (Female)  
Haripur

~~ATTESTED~~

Better copy

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

**CORRIGENDUM**

Please read the name of school in respect of the following appointment in the appointment order issued little vide this office Endst No. 13479 2020 dated 14.04.2020 in the best interest of public service.

1.			Name	UC	Name of school	Read as
2.	2	Saba Ghafoor	Abdul Ghafoor	Bait Gali	GGPS Najab	GGPS
3.	3	Ishrat	Umer Khitab	Bait Gali	GGPS Gujratian	
4.	4	Anisa Zaib	Muhammad	Bait Gali	GGPS Singa	
5.	13	Ayesha Nisar	Nisar Ahmad	Khas Bara	GGPS Paki Ban	
6.	18	Rukhsana	Sheikh Ahmad		GGPS	
7.		Naila				

District Education Officer  
Female Haripur

Endst No. 13528-35/DEO/ (F)/hrp/Estb/PSF (F) Corrigendum

Copy to

dated 15.04.2020

1. The Director Elementary and secondary education, Khyber Pakhtunkhwa.
2. The Deputy Commissioner Haripur.
3. The District Account Officer Haripur.
4. The Medical Superintendent DHQ Haripur.
5. The DMO Edu Department, Haripur.
6. PS to Secretary Elementary and secondary education, Khyber Pakhtunkhwa.
7. The SDEO (Female) Ghazi.
8. All the Head Teachers Concerned.
9. All Teachers concerned.
10. Office record file.

District Education Officer  
Haripur

**ATTESTED**

~~ATTESTED~~

*[Signature]*  
Director Education Officer (A)  
Haripur

1. Director B&SE Khyber Pakhtunkhwa, Peshawar
2. District Account Officer Haripur
3. District Monitoring Officer (GMA) Haripur
4. SDBO (Female) Concerned
5. Focal Person of HRMIS Local Office with the directions to update the date of above mentioned teachers accordingly
6. Office record file.

Date: 05/05/2023

*[Signature]*  
Director Education Officer (A)  
Haripur

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

Order No. 5090-95

Copy of the above is forwarded to the

Sl. No.	Name & Designation	From	To	Remarks
1	M. Iqbal PST BP&SE 13302-773816-4	OPPS Sialkot (M18182573)	OPPS Quetta (M18182504)	Agreed Vacant Post

The transfer/adjustment of following teacher is hereby ordered as mentioned against her name on her own pay & grade in the best interest of public service.

**TRANSFER/ADJUSTMENT ORDER**

**OFFICE OF THE  
DISTRICT EDUCATION OFFICER (A)  
HARIPUR**  
Office Phone No. 0591-270151

*[Handwritten marks]*  
B  
18

~~ATTACHED~~

~~Director, Education Officer (A)~~  
~~Haripur~~

~~Director, Education Officer (A)~~  
~~Haripur~~

- 1. Director, E&SB, Khyber Pakhtunkhwa, Peshawar
- 2. District Accounts Officer, Haripur
- 3. District Monitoring Officer (MVA), Haripur
- 4. SDEO (A) concerned
- 5. Local Person of HRMS Local office with the directions to update the data of above mentioned teachers accordingly
- 6. Office record file

Even No. & Date:

Copy of the above is forwarded to the:-

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

Please read as GPRS, Model Town, Haripur instead of GPRS Qazim Haripur  
in r/o Ms. Ishtiaq PST, BPS-12 at S.No. 01 with this office order, reference No. 5090-95 dated  
05/06/2023

**CORRIGENDUM ORDER**

**OFFICE OF THE  
DISTRICT EDUCATION OFFICER (A)  
HARIPUR  
(Office Order No. 0223-2013)**

*Handwritten signatures and initials at the bottom left of the page.*





OFFICE OF THE  
DISTRICT EDUCATION OFFICER (FEMALE)  
HARIPUR

Phone No: 0995-920156



Rationalization Order:

Reference to Directorate of Elementary & Secondary letter No.8602-51 Dated 19-07-2024 regarding DEOs meeting on Rationalization & In the light of guidance by Directorate E&SED KPK regarding rationalization vide notification Endst; No 4499-4501 Dated 27-10-2015. The adjustment of following Primary teachers as per proposal of SDIO (Female) Haripur/Ghazi & Khanpur is hereby ordered in the best interest of public service with immediate effect.

S.#.	Name of Teacher / Designation	Date of Appointment	Present School/	From		To		Total Teacher	Reason
				Enroll:	Total Teacher	Posting School/	Enroll:		
01.	Beenish Bibi SPST BPS-14	09-01-2006	GGPS Shangri	52	03	GGPS Talhad	293	6	On Rationalization /Need Basis
02.	Nazia Bibi PST BPS-13	26-03-1996	GGPS Banda Munir Khan	73	3	GGCMS NELOR MAIRA	195	6	On Rationalization /Need Basis
03.	NABEELA ASLAM PST-12	01-06-2019	GGPS BAYIAN AHMAD ALI KHAN	67	3	GGPS KANDUL	75	1	On Rationalization /Need Basis
04.	AMMARA SAEED PST-12	24-11-2017	GGPS PHARHALA	151	5	GGPS Alloli	302	7	On Rationalization /Need Basis
05.	JAMEELA BIBI PST BPS-12	22-12-2010	GGPS NOORDI	64	3	GGPS GHAIBA	70	1	On Rationalization /Need Basis
06.	SHAISTA BIBI PST-12	06-05-2020	GGPS GHUMAWAN NO.1	123	4	GGPS PHULLAH GALLI	192	4	On Rationalization /Need Basis
07.	Kinza Javed PST-12	09-03-2016 Transfer In Dist: Hrp 09-02-2022	GGPS KAHAL BALA	73	3	GGPS Magri	126	2	On Rationalization /Need Basis
08.	NAZIA SHAHEEN PST-12	17-03-2015	GGPS DURSHKHAIL	71	3	GGPS GHAR SEARIAN	180	4	On Rationalization /Need Basis
09.	SEHRISH BIBI PST BPS-12	23-01-2019	GGPS BAGRA #1	185	6	GGPS SHORAG	103	2	On Rationalization /Need Basis
10.	GULFAM BIBI SPST-14	21-04-1999	GGPS CHACK SHAH MUHAMMAD	85	3	GGPS MOONAN	121	2	On Rationalization /Need Basis
11.	SAIMA BIBI PST-12	16-01-2019	GGPS DOBANI BALA	131	5	GGCMS Ali Khan	205	7	On Rationalization /Need Basis
12.	SIDRA SAEED PST-12	11-05-2015	GGPS KHOLIAN BALA	401	11	GGPS BURQA	32	1	On Rationalization /Need Basis
13.	IRUM HAMEED PST-12	26-03-2019	GGPS TIP	511	14	GGPS KOT NO.1	510	10	On Rationalization /Need Basis
14.	SAMINA KOUSAR SPST 14	09-01-2009	GGPS KALAS	162	5	GGPS DHENDAH	312	7	On Rationalization /Need Basis
15.	ISHIRAT JAHAN PST-12	06-03-2020	GGPS MODEL TOWN	111	4	GGCMS KANGRA	347	8	On Rationalization /Need Basis

**ATTACHED**

16.	NAZIMA BIBI PST-12	15-01-2019	GGPS DARWAZA	127	4	GGPS KAIHAKA	190	4	On Rationalization /Need Basis
17.	FOZIA BIBI SPST-14	02-10-2010	GGPS KTS SEC NO,3	234	7	GGPS KTS NO,1	497	11	On Rationalization /Need Basis
18.	SHAZIA BIBI SPST-14	17-10-2005	GGPS GEHAR KHAN	47	3	GGPS Padhana	340	8	On Rationalization /Need Basis
19.	SUMAIRA ZEB PST-12	04-05-2016	GGPMS JCKA MODEL KTS	205	9	GGPS KTS NO.1	497	11	On Rationalization /Need Basis
20.	MISBAH AMEN SPST-14	09-01-2009	GGPS DOBANDI BALA	131	5	GGPS Kot Najibullah	510	10	On Rationalization /Need Basis
21.	SUMAIRA BIBI PST-12	04-10-2017	GGPS SRAI SALEH NO,1	283	8	GGPS Sarai Salah No.2	513	12	On Rationalization /Need Basis
22.	Hina Gillani PST -12	28-05-2016	GGPS Laban Bandi	243	7	GGPS Dhedan	302	6	On Rationalization /Need Basis
23.	Ume Amara	06-01-2014	GGPS Paswal	73	3	GGCMS Meelum	263	7	On Rationalization /Need Basis
24.	Saira Mehboob PST BPS-12	24-03-2016	GGPS Khairoch	83	3	GGPS Dall	108	2	On Rationalization /Need Basis
25.	Zaib-un Nisa PST BPS-12	02-09-2006	GGPS Ghar Maira	84	3	GGPS Qazipur	191	4	On Rationalization /Need Basis
26.	Donia Gul PST BPS-12	16-01-2019	GGPS Dartian	98	4	GGPS Sardhana	141	3	On Rationalization /Need Basis
27.	Nida Shah PST BPS-12	22-04-2021	GGPS Khanpur	159	7	GGCMS Ternawa	181	5	On Rationalization /Need Basis
28.	Ayesha Zaheer PST BPS-12	16-01-2019	GGPS Khanpur	159	7	GGPS Mumrial	261	5	On Rationalization /Need Basis

sd/-  
District Education Officer (Female)  
Haripur

Endst.No. 6087-9 ADEO Primary Establishment

Dated: 15/08/2024

**Copy for information to:-**

1. The Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. The Deputy Commissioner Haripur. District Monitoring Officer, Education Monitoring Authority (EMA) Haripur.
3. The SDEO (Female) Khanpur / HARIPUR / GHAZI.
4. The Chief Project Officer Babar Hussain Shah AAR Japan w/r office letter No. 2024/AAR/ PK/ HR dated May 14, 2024.
5. Office record file.

District Education Officer (Female)  
Haripur

**ATTESTED**



Annex E  
14

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

(Office Phone No. 0995-920156)

**OFFICE ORDER:**

In compliance with the direction issued by worthy Secretary (E&SI) Department Govt. of Khyber Pakhtunkhwa in letter No. SO (PE-M) /E&SI/D/2-1/Transfer-Posting/CM Directives/UCs & District Cadre/KP/2024, Peshawar Dated 3<sup>rd</sup> September 2024 Regarding posting/transfer of teachers in their domiciled District/Union Council, the posting /transfer of the following primary school teachers (PST) are hereby ordered to their domiciled Union Council in the interest of public service with immediate effect.

Sl. No.	Name & Designation	Transfer		Remarks
		From	To	
01	Sobia Bibi PST BPS-12	GGPS Hassanpur	GGPS Umer Khana	In her Domiciled UC
02	Mehwish Israr PST BPS-12	GGPS Bhai, Ghazi	GGPS Khairbara	In her Domiciled UC
03	Wajiha Naz PST BPS-12	GGPS Dheri Naqarchian	GGMS Salam Khand	In her Domiciled UC
04	Rabia Shaheen PST BPS-12	GGPS Mohat Sector	GGPS Gawari	In her Domiciled UC
05	Zaib-un-Nisa PST BPS-12	GGPS Qazipur	GGPS Ghari Maifa	In her Domiciled UC
06	Sakina PST BPS-12	GGPS Khialo	GGPS Mohat Sector	In her Domiciled UC
07	Musrat Naz PST BPS-12	GGPS Hassan Pur	GGPS Pakidan	In her Domiciled UC
08	Kiran PST BPS-12	GGPS KTS SEC#2 TERBELA	GGPS Singa	In her Domiciled UC
10	Zara Khan PST BPS-12	GGPS Makhari Golony	GGPS Pakidan	In her Domiciled UC
12	Shumaila Gul PST BPS-12	GGPS Soha	GGPS Ghari Shah Muhammad	In her Domiciled UC
13	Ishrat PST BPS-12	GGMS Kangra No.2	GGPS Zarat Bela	In her Domiciled UC
14	Adeela Fiaz Malik PST BPS-12	GGPS Khanpur No # 2	GGPS Baghpur Dehri	In her Domiciled UC
15	Sidra Shaheen PST BPS-12	GGPS Jullan	GGPS Kotehra Chhol	In her Domiciled UC
16	Tehmina Inikhar PST BPS-12	GGPS Darkot	GGPS Darkot	In her Domiciled UC
17	Sitara Parveen PST BPS-12	GGPS Kohala Bala	GGPS Kehmal Payeen	In her Domiciled UC
18	Asma Nisar PST BPS-12	GGPS Dhunan	GGPS Kot Janda	In her Domiciled UC
19	Ayesha Zaher PST BPS-12	GGPS Mumraill	GGPS Khanpur No 2	In her Domiciled UC
20	Rabia Kousar PST BPS-12	GGPS Mumraill	GGPS Khanpur No 1	In her Domiciled UC
21	Ayesha Mehmoona Tabbasum PST BPS-12	GGPS Najaspur	GGPS Bheray	In her Domiciled UC
22	Nabeed Akhtar PST BPS-12	GGPS Darra Dada Shaheed	GGPS Garamhoan	In her Domiciled UC
23	Sadia Kiran PST BPS-12	GGPS Dartian	GGPS Torkian	In her Domiciled UC

15

24	Nargis Bibi PST BPS-12	GGPS Kangra No.1	GGPS Jantar	In her Domiciled UC
25	Chand Kiran PST BPS-12	GGPS Dhuri	GGPS Roonal	In her Domiciled UC
26	Gulnaz Bibi PST BPS-12	GGPS Jandi Sher Khan	GGPS Koka	In her Domiciled UC
27	SAMINA PST BPS-12	GGPS AKHOON BANDI	GGPS Kholan Balg	In her Domiciled UC
28	FARIAT PST BPS-12	GGCMS KANGRA NO.2	GGPS Rehana Maira	In her Domiciled UC
29	Sidra Sarwar PST BPS-12	GGPS JATTI PIND	GGCMS Soha	In her Domiciled UC
30	KHALIDA PERVEEN PST BPS-12	GGPS NAGIR	GGPS Hall Judal	In her Domiciled UC
31	SOBIA BIBI PST BPS-12	GGPS GHULAM ABAD	GGPS Kalingar No.1	In her Domiciled UC
32	SADAF BIBI PST BPS-12	GGCMS ALI KIIAN	GGPS Bagra No.2	In her Domiciled UC
33	ZAKIA REHMAN PST BPS-12	GGPS PADHANA	GGPS Dalri	In her Domiciled UC
34	SUMIRA BIBI PST BPS-12	GGPS SARAI SALEH NO. 02	GGPS Rehana	In her Domiciled UC
35	SAMIA BIBI PST BPS-12	GGPS SOKA BRANCH # 2 HARIPUR	GGPS Latif Abad	In her Domiciled UC
36	SHAIHIDA BIBI PST BPS-12	GGPS TIP (Haripur South)	GGPS Kangar Amgah	In her Domiciled UC
37	UZMA KIYANI PST BPS-12	GGPS TIP	GGPS TRAR	In her Domiciled UC
38	SAMINA PST BPS-12	GGPS AKHOON BANDI	GGPS Chach Maira	In her Domiciled UC
39	SALMA BIBI PST BPS-12	SIKANDAPUR	GGPS Baso Maira	In her Domiciled UC
40	RABIA NAZIR PST BPS-12	SIKANDAPUR	GGPS Darwaza	In her Domiciled UC
41	FARHANA TAJ PST BPS-12	KTS SEC#2 TERBELA	GGPS Padhana	In her Domiciled UC
42	MADIHA MUGHAL PST BPS-12	KTS SEC#2 TERBELA	GGPS Pahroo	In her Domiciled UC
43	SAMINA ZAMAN PST BPS-12	GGPS MOHRA SERIAN	GGPS Sawar Maira	In her Domiciled UC
44	ASIA BIBI PST BPS-12	GGPS BANDI MIYAN PIRDAD	GGPS Chaintri	In her Domiciled UC
45	Schriah Bibi PST BPS-12	GGPS SHORAG / BAGRA	GGPS Ghafi Serian	In her Domiciled UC
46	SAIRA TEHREEM PST BPS-12	GGPS RAILWAY STATION	GGPS TIP HARIPUR	In her Domiciled UC
47	SAIMA BIBI PST BPS-12	GGCMS ALI KIIAN	GGPS CHAJIAN	In her Domiciled UC
48	SABA PARVEZ PST BPS-12	GGPS BIJURI	GGPS PIND JAMAL KIIAN	In her Domiciled UC
49	UME AMARA PST BPS-12	GGCMS MEBLUM	GGPS PASWAI	In her Domiciled UC
50	NAZIA SHAHEEN PST BPS-12	GGPS CHAPRI MAIRA	GGPS NELOR MAIRA	In her Domiciled UC
51	GULNAZ BIBI PST BPS-12	GGPS KTS NO 4	GGPS BADHORA	In her Domiciled UC
52	SUMAIRA BIBI PST BPS-12	GGCMS NILORE MAIRA	GGPS JATTIPIND	In her Domiciled UC
53	MISBAH BIBI PST BPS-12	GGPS AIN PUR	GGPS JAM	In her Domiciled UC
54	BUSHRA ZED PST BPS-12	GGPS BAN GERHAM	GGPS Chapri	In her Domiciled UC

~~ATTESTED~~

~~SECRET~~

Muzir Education Officer (V)  
Haripur

1. Director I&ST, Khyber Pakhtunkhwa, Peshawar.
2. Deputy Commissioner Haripur.
3. IS to Secretary Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
4. District Monitoring Officer (DMA), Haripur.
5. All the members of Committee as Notified.
6. Office record file.

Copy of the above is forwarded to:-

Under No. 6949-87 /ADUO (P/Man) Dated Haripur the 14/09/2024.

Muzir Education Officer (V)  
Haripur

55	Maryam Ibbi	PST DPS-12	QPS Qazir	QPS Shorag	In her Domicile etc
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(16)

Answer (F) (A)

Charge Report (Under Protest)

Certified that Miss Ishrat D/o

Alma Charab is hereby transferred

against the post of PSI on

school base & in BPS 12

at Kharat Bela. Under

the DEO (P) K.P. Kunder No

6979-87 Date of 88 Sep 2007

took over charge of afternoon

Incharge of the school  
took over

Zeenat

Head Teacher  
G.P.S. Zarat Bela  
Tal. Chazal Dist. Hanpur

28/09/24

Day (Date)

Date

Ana... 9

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To

The Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar.

Subject **Departmental appeal** against the **LETTER NO. (PE-M)/P&SED/2-1/TRANSFER-POSTING/CM DIRECTIVES/ UC'S & DISTRICT CADRE/KPK/2024** dated 03.09.2024 in the light of the decision of Cabinet and subsequent proceedings in continuation of the letter, to the transfer order of appellant dated 14.09.2024

Prayer

*On acceptance of departmental appeal, the impugned Letter No. (PE-M)/P&SED/2-1/ Transfer-Posting/CM DIRECTIVES/ UC's & District Cadre/KPK/2024 dated 03.09.2024 and subsequent proceedings in continuation of the impugned letter and posting / transfer order dated 14.09.2024 may graciously be set aside and the appellant may also be allowed to continue her services at GGPS Kangra No.2 Haripur*

**Respectfully Sheweth:**

1. That the appellant was the permanent resident of Kaneer Tehsil Ghazi District Harpur and applied for the appointment against the post of PST through ETEA. Copy of CNIC is annexed.
2. That the Appellant was appointed as PST against the vacant post at GGPS Gujratian vide appointment order dated 14.04.2020. Copy of appointment order is annexed
3. That appellant was transferred through corrigendum dated 15.04.2020 against the vacant at GGPS Singa. Copy of corrigendum order is annexed
4. That the Govt. of KPK regularized the services of appellant vide Notification dated 24.12.2022. Copy of regularization order dated 24.11.2022 is annexed.
5. That on regularization the service of appellant was transferred from GGPS Singa to GGPS Qazian vide order dated 05.06.2023. Copy of transfer order is annexed.
6. That again the corrigendum order was issued and the appellant was transferred from GGPS Qazian Haripur to GGPS Model Town Kangra Colony Haripur. Copy of corrigendum order is annexed.
7. That the services of appellant were again transferred from GGPS Model Town to Kangra No.2 Haripur vide rationalization order dated 15.08.2024. Copy of rationalization order dated 15.08.2024 is annexed.

**ATTESTED**

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8. That the respondent has directed the cabinet decision regarding repatriation of teacher to their respective village of domicile vide letter dated 03.09.2024. Copy of letter is annexed.
9. That in the light of decision of the Cabinet, the Respondent No.3 has transferred the services of appellant from GGPS Kangra No.1 to GGPS Ziarat Bela, Tehsil Ghazi District Haripur. Copy of transfer order dated 14.09.2024. Copy of transfer order is annexed.
10. That the subsequent proceedings regarding implementation of the cabinet decision are also contradictory as the policy for unmarried civil servant is very much clear, the same is reproduce:-  
**"iv. All the posting/transferring authorities may facilitate the posting/transfer of unmarried female Government Servant at the station of their parents"**  
Copy of manual of civil services rules of KPK Govt. is annexed
11. That the parents of appellant are residing at Kangra Colony Tehsil and District Haripur. Copy of CNIC of mother of appellant is annexed
12. That the impugned decision of cabinet division is result of sheer malice and is an arbitrary, whimsical, capricious order which needs to be declared without lawful authority and against the law as the appellant and other appointees had been declared as civil servant vide regularization order dated 24.12.2022.

Under the circumstances, it is respectfully prayed that on acceptance of departmental appeal, the Impugned Letter No.(PE-M) /P&SED/2-1/ Transfer-Posting/CM DIRECTIVES/ UC's & District Cadre/KPK/2024 dated 03.09.2024 and subsequent proceedings in continuation of the impugned letter and posting / transfer order dated 14.09.2024 may graciously be set aside and the appellant may also be allowed to continue her services at GGPS Kangra No.2 Haripur

Dated: 16.09.2024

**Appellant**

Mst. Ishrat D/o Umar Khatab  
resident of Nai Abadi Kangra  
Colony, Tehsil and District  
Haripur presently working /  
posted as PST (BPS-12) at GGPS  
Kangra No.2 Haripur.  
Cell # 0340-3281656

Copy for information to:

1. The Secretary E&SE KPK Peshawar
2. The DEO (Female) Haripur

**ATTESTED**





Anam H 20

**DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION**

**KHYBER PAKHTUNKHWA PESHAWAR.**

**NOTIFICATION**

WHEREAS, Mst; Ishrat PST was transferred GGPS Kangra No.2 to GGPS Ziarat Bela District Haripur on the basis of her Domicile of Union Council vide office order bearing Endst:No .6979-87 dated 14-09-2024 issued by the DEO (F) Haripur in the light of policy of the Provincial Government.

AND WHEREAS, aggrieved, from the aforesaid transfer order dated 14-9-2024, the petitioner has filed a Writ Petition No. 991-A/2024 under petition titled Mst ;Ishrat v/s Govt;of KP and others before the Honorable Peshawar High Court, Abbottabad Bench. Which was heard on dated 25-9-2024 by converting the titled petition into a departmental appeal on behalf of petitioner with the direction to the department for disposal of the same within 10 days from the receipt of the cited order under the law and rules in vogue.

AND WHEREAS, in compliance of the order dated 25-9-2024 of the Honorable High Court, the departmental appeal of the appellant was considered in terms of law and rules regarding the repatriation of the primary school teachers to their original union council whercin they were initially appointed on the basis of their Domicile against the said post.

AND WHEREAS, the DEO (F) Haripur forwarded the instant appeal for the decision of the Appellate Authority in compliance of the judgment of the Honorable Peshawar High Court, Abbottabad Bench vide No.7374 dated 28-9-24.

AND WHEREAS, After threadbare discussion and perusal of the cited rules and policy, the plea of the appellant has been found merit less, and without any plausible substances, Hence the declined. by maintaining the original transfer order dated 14-9-2024 of the petitioner on the grounds of being legally competent and even is the result of rules and policy in field.

NOW THEREFORE, Now therefore in compliance of the order dated 25-9-2024 of the Honorable Peshawar High Court Peshawar in the titled petition and in exercise of powers conferred upon the Director Elementary and Secondary Education Khyber Pakhtunkhwa, being Appellate Authority, is pleased to regret/struck down the appeal of the appellant in the light of rules and policy by of the provincial Government communicated by Section Office (PE-M) vide letter No. SO (PE-M)/E&SED/2-1/Transfer-posting/CM Directives/UC's & District Cadre/K1/2024 dated 03-09-2024 by maintain the original transfer order dated 14-9-2024 of the District Education Officer (F) Haripur on the ground of being legally competent and is the result of rules and policy in the interest of public service.

Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar.

Endst: No: 6294-97 F.No.341/Vol-03/Haripur. Dated 03/10/2024.

Copy forwarded to the:-

1. Additional Registrar, Peshawar High Court, Abbottabad Bench.
2. District Education Officer (Female) Haripur w/t to her letter No. and date cited above.
3. District Accounts Officer, Haripur.
4. Mst; Ishrat PST GGPS Ziarat Bela Haripur.
5. PA, to Director Elementary & Secondary Education, Local Directorate, Peshawar.

**ATTESTED**

Assistant Director (Female)  
Directorate of E&SE Khyber Pakhtunkhwa,  
Peshawar

08/10/24

## وکالت نامہ

بعدالت جناب سرسید ٹریڈنگ کمپنی پرائیویٹ لمیٹڈ

مقدمہ بعنوان

بنام صعوفہ انکمورٹس

منجانب  
دعویٰ

	غلت
	موردہ
	جرم
	نشان

### باعث تحریر آنکہ

مقدمہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ اجملہ

آن مقام میں رہ کیلئے کھنڈہ اللہ ضرر روسیدہ صاحب ایڈووکیٹس

کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی نظر ثانی و پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختیار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جواب دہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پرداختہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ یا جد سے باہر ہو تو وکیل صاحب پابند نہ ہونگے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

مقام سر کے لئے منظور ہے

دستخط ایڈووکیٹس

Accepted  
Sd/-