


FORM OF ORDER SHEET

Court of _____

Review Petition No. 1322 /2024

No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	01/11/2024	<p>The Review Petition in appeal no. 879/2024 submitted today by Mr. Atif Khattak Advocate. It is fixed for hearing before Division Bench at Peshawar on 11.11.2024. Original file be requisitioned. Parcha Peshi is given to the counsel for the petitioner.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR

Review no 1322/2024
In
Service Appeal 879/2024

Nadia Ashfaq

.....Petitioner/Appellant

VERSUS

District Education Officer (FEMALE), District Karak & others

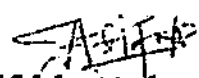
.....Respondents

I N D E X

S. No.	Description of documents	Annexs	Pages
1.	Review Petition		1-4
2.	Affidavit		5
3.	Memo of Appeal		6-11
4.	Copy of the impugned judgment/order dated 04.10.2024	A	12-17
5.	Copy of the E-posting/transfer policy dated 30/07/2024	B	18-20
6.	Copy of the letter dated 14-05-2024	C	21/22
7.	Copy of the Application Dated 28-10-2024, Endst No-889	D	23
8.	Wakalat Nama		24

Petitioner/ Appellant

Through


Atif khattak

Usman Masood

(1)

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR

Review no 1322/2024
In
Service Appeal 879/2024

Nadia Ashfaq D/o Ashfaq Ahmad, Presently Posted at GGHS Palosa
Kemanri, R/o Village Post office Sabir Abad District Karak.
.....**Petitioner/Appellant**

VERSUS

1. **D**istrict Education Officer (FEMALE), District Karak.
2. **D**irector Elementary & Secondary education Khyber
Pakhtunkhwa Peshawar.
3. **S**humaila Rasheed CT-IT Presently posted at GGHS No.1
Karak.**Respondents**

REVIEW PETITION AGAINST THE ORDER
DATED 4/10/2024 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR PASSED IN THE TITLED
SERVICE APPEAL NO 879/2024.

PRAYERS.

THAT ON ACCEPTANCE OF THIS REVIEW
PETITION THAT THE JUDGMENT PASSED
IN SERVICE APPEAL NO 879/2024 MAY
KINDLY BE REVIEWED BY RESTORING THE
SERVICE APPEAL AND THE RESPONDENTS
MAY BE DIRECTED TO ALLOW THE
PETITIONER/APPELLANT TO CONTINUE
HER SERVICES AT GGHS NO.1 KARAK.

ANY OTHER REMEDY WHICH THIS AUGUST
TRIBUNAL DEEMS FIT AND APPROPRIATE
THAT MAY ALSO BE AWARDED IN THE
FAVOR OF PETITIONER/APPELLANT.

RESPECTFULLY SHEWETH.

1. That **Service Appeal 879/2024** was dismissed by this Hon'ble tribunal on **04.10.2024**.

(Copy of the impugned judgment/order dated 04.10.2024 is annex "A").

2. That the petitioner respectfully submits the following for the review and reconsideration of the impugned judgment/order for the following grounds and reasons.

GROUND S:-

A. That the honorable tribunal knock out the appellant from this honorable tribunal that charge of the post is already been assumed by the appellant but with due respect this honorable tribunal there is no legal bar/impediments if the charge has been assumed by the appellant, that the impugned order cannot be reversed hence this judgment may kindly be reversed.

B. That as per posting, transfer policy, as well as specific terms and conditions of the regularization order of the appellant which is already placed on file with the appeal petition, also support the stance of the appellant and this honorable tribunal does not consider the said policy and terms and conditions of the regularization order, rather this honorable tribunal used the same terms and conditions against the appellant which is unlawful, illegal and without jurisdiction hence the impugned of this honorable tribunal be reconsidered and reviewed.

C. That in appeal in written comments the respondent No. **1 & 2** took reliance on E-posting/transfer policy dated **30/07/2024**(E-posting/transfer policy for the employees of teaching cadre BS-12 to BS-18 of E&SE Department Khyber Pakhtunkhwa) but petitioner/appellant was not eligible for transfer on the basis E-posting/transfer policy.

(Copy of the E-posting/transfer policy dated 30/07/2024 is annexed as "B")

D. That the impugned posting transfer order is illegal, unlawful and without jurisdiction as the position code is not available at GGHS Palosa Kemanri (KARAK) DDO Code KK 6073 due to which her salary is stopped w.e.f. 01-04-2024 to till date as evident from the letter dated 14-05-2024.

(Copy of the letter dated 14-05-2024 is annexed as "C")

E. That the application for the absence of position code is already filed by the Headmistress of the concerned school to the DEO Female Karak for the appellant.

(Copy of the Application Dated 28-10-2024, Endst No-889 is annexed as "D")

F. That the appellant has not been treated by law and his rights secured and guaranteed under the law have been badly violated.

G. That the appellant has been treated against the law unequally & thus deprived of equal protection of the law as envisaged by Art.4 of the Constitution.

H. That appellant had been singled out for the impugned discriminatory action which has no precedent/example & thus Art.25 has been flagrantly violated.

I. That impugned actions of respondents is against fair play, good conscience, and principles of policy.

J. That the transfer order of the appellant speaks volumes for violation of public policy & good governance motivated by political favoritism & nepotism which are disapproved by the rule of law.

K. That the impugned order is void abinitio and illegal as the same has been passed in utter violation of the law and Posting, transfer policy and specific terms and conditions of her regularization order.

L. That the impugned order has no legal footing to stand upon as the same has been passed in utter disregard of the posting transfer policy and the terms and conditions of the regularization order of the appellant.

M. That the impugned transfer order is prima facie discriminatory as the appellant is performing his duties with zeal and zest and no complaint whatsoever has been made against him and hence he has been treated unequally and in violation of Articles 4 and 25 of the Constitution.

N. That the impugned order has been passed under undue rather undesirable political influence which militates against the fundamental right of the appellant.

O. That the impugned order neither conforms to transfer policy nor


(4)

to the judgment of the Supreme Court wherein law for such cases have been enunciated and thus it is prima facie based on Malafide.

It is therefore humbly prayed that by accepting this review petition the appeal of the petitioner/appellant may be accepted as prayed for in the larger interest of justice.

Through

Petitioner/ Appellant


Atif Khattak

Usman Masood
Advocates, Peshawar.

(5)

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR

Review no _____/2024
In
Service Appeal 879/2024

Nadia Ashfaq

.....Petitioner/Appellant

VERSUS

District Education Officer (FEMALE), District Karak & others
.....Respondents

AFFIDAVIT

I, **Nadia Ashfaq** D/o Ashfaq Ahmad (Petitioner/Appellant), do here by affirm that the contents of the review petition are true and correct to the best of knowledge and nothing has been concealed from this Hon'ble tribunal.

DEPONENT


Nadia Ashfaq



(6)

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal _____/2024

Nadia Ashfaq D/o Ashfaq Ahmad, Presently Posted at GGHS Palosa
Kemanri, R/o Village Post office Sabir Abad District Karak.
.....Appellant/Applicant

VERSUS

1. District Education Officer (FEMALE), District Karak.
2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa
Peshawar
3. Shumila Rasheed CT-IT. presently posted at GGHS Karak No.1
.....Respondents

SERVICE APPEAL U/S 4 OF THE SERVICE TRIBUNAL ACT 1974
AGAINST THE ORDER OF RESPONDENT NO. 1 DATED
13.03.2024 AS WELL AS AGAINST THE DEPARTMENTAL
APPELLATE AUTHORITY (DIRECTOR OF ELEMENTARY AND
SECONDARY EDUCATION, KPK) WHO DID NOT DECIDE THE
APPEAL OF THE APPELLANT WITHIN THE STIPULATED
PERIOD.

Respectfully Sheweth:

The brief facts necessitating this Appeal are submitted as
under:-

1. That appellant is law-abiding citizen of Pakistan and a permanent bonafide Resident of Village Post office Sabir Abad, District Karak and is entitled to all the rights guaranteed by the Constitution of Islamic Republic of Pakistan, 1973. (Copy of CNIC is attached as annexure "A")
2. That initially appellant was appointed as CT-IT (BPS-12) in Govt Girls High School No.1, on 07/09/2022. (Copy of the Appointment Order is attached as Annexure "B").
3. The appellant has been performing her duty with full devotion and zeal to the satisfaction of her superiors and no complaint whatsoever has ever been made against her from any quarter/authority.

(7)

4. That Respondent No. 1 issued illegally impugned transfer order office No.2285-88 dated 13/03/2024 of the appellant to the GGHS Palosa Kemanri from GGHS Karak No.1 against the vacant Post without any reason and justification. **(Copy of the impugned order dated 13/03/2024 is attached as Annexure "C").**
5. That the appellant Aggrieved from the Impugned order No.2285-88, dated 13/03/2024 of the respondent No.1, submitted a departmental appeal/representation to the Director, Elementary Education Khyber Pakhtunkhwa, Peshawar but the same has not been responded so far. **(Copy of the Departmental Appeal is attached as annexure "D").**
6. That the appellant is highly aggrieved from the impugned office order dated 13/03/2024 of the Respondent No.1 and knock the doors of this Honorable Tribunal on the following grounds inter-alia:

GROUND:

- A. That the impugned transfer order office No.2285-88 dated 13/03/2024 of Respondent No.1 is a flagrant violation of the transfer & posting policy of the Provincial Govt under the same department which is illegal and also based on Malafide intentions hence liable to be set aside. **(Copy of the Posting/Transfer Policy of the Provincial Govt is attached as Annexure "E").**
- B. The appellant has not been completed i.e. **Three Years (3 Years)** which is against the Posting/Transfer Policy of the Provincial Govt and the order is Pre-mature at that instant and the impugned order has been passed under undue rather undesirable political influence which militates against the fundamental right of the appellant.
- C. That the impugned order is neither in the public interest nor in the exigency of service and also an utter violation of the transfer/posting policy of the Provincial Govt as a result the impugned order is not tenable in the eyes of law.
- D. That, the appellant was initially appointed as on school based policy, under that policy one has not to be transferred but appellant was illegally been transferred, hence the order impugned is liable to be set aside.

- (8)
- E. That the appellant has been treated unequally before the law and thus she has been deprived of equal protection of law.
- F. That the transfer order of the appellant speaks volumes for violation of public policy & good governance motivated by political favouritism & nepotism which are disapproved by the rule of law.
- G. That the impugned order has no legal footing to stand upon as the same has been passed in utter disregard of the Posting/Transfer Policy of the Provincial Govt and prevailing dictum of superior courts.
- H. That the impugned transfer order is prima facie discriminatory as the appellant is performing her duties with zeal and zest and no complaint whatsoever has been made against her and hence she has been treated unequally and in violation of **Articles 4 and 25** of the Constitution of Pakistan.
- I. That the impugned notifications are also an affront to the Judgments passed by the Honorable Supreme Court of Pakistan.
- J. That any other ground can, also, be taken with permission of this Honorable Tribunal during Arguments.

It is, therefore, prayed that by accepting this appeal the impugned immature transfer order of respondent No.1, dated 13/03/2024 may please be declared as illegal, unlawful, and thus ineffective upon the right of the appellant and consequently appellant may be allowed to perform his duty as CT-IT (BPS-12) at the Govt Girls High Secondary School No.1 (GGHSS Karak No.1) in the larger interest of Justice.

Nuer
Appellant/Applicant
Through
Muhammad Atif Khattak
Muhammad Atif Khattak
Advocate, Peshawar

CERTIFICATE:

Certified that no such Appeal has earlier been filed on the subject matter before this Hon'ble Tribunal.

Advocate *Muhammad Atif Khattak*

(4)

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal _____/2024

**Nadia Ashfaq D/o Ashfaq Ahmad, Presently Posted at GGHS Palosa
Kemanri, R/o Village Post office Sabir Abad District Karak.**

.....Appellant/Applicant

VERSUS

District Education Officer (FEMALE), District Karak.

.....Respondent

AFFIDAVIT

**I, Nadia Ishfaq S/o Ashfaq Ahmad R/o Village Post office Sabir
Abad District Karak, do hereby solemnly affirm and declare on Oath 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 Tribunal.**

Identified by

Muhammad Atif Khattak
Advocate, Peshawar.


DEPONENT

CNIC NO: 14202-5460557-2

Cell # 0301-8866442

(S) -10-

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal _____/2024

Nadia Ashfaq D/o Ashfaq Ahmad, Presently Posted at GGHS Palosa
Kemanri, R/o Village Post office Sabir Abad District Karak.

.....Appellant/Applicant

VERSUS

District Education Officer (FEMALE), District Karak.

.....Respondent

APPLICATION FOR SUSPENSION OF IMPUGNED ORDER
DATED 13/03/2024, TILL THE FINAL DECISION OF THE CASE


Respectfully Sheweth:

1. That the above tilted Service Appeal is being filed today in which no next date of hearing has yet been fixed.
2. That the applicant/appellant has a prima facie case and is hopeful of its success.
3. That balance of convenience also lies in favour of the applicant/appellant.
4. That if the impugned order dated **13/03/2024** is not suspended, the applicant/appellant will suffer irreparable loss.
5. That grounds of the Service Appeal may please be read as part and parcel of this Application.

It is, therefore, prayed that by accepting this application, the impugned order dated **13/03/2024** may please be suspended, till the final decision of the case.


Applicant/Appellant

Through


Muhammad Atif Khattak
Advocate, Peshawar

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BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal _____/2024

Nadia Ashfaq D/o Ashfaq Ahmad, Presently, Posted at GGHS Palosa
Kemanri, R/o Village Post office Sabir Abad District Karak.

.....Appellant/Applicant

VERSUS

District Education Officer (FEMALE), District Karak.

.....Respondent

AFFIDAVIT

I, Nadia Ishfaq S/o Ashfaq Ahmad R/o Village Post office Sabir
Abad District Karak, do hereby solemnly affirm and declare on Oath that
the contents of the accompanying **Application for Interim Relief** are
true and correct to the best of my knowledge and belief and nothing has
been concealed from this Hon'ble Tribunal.

Identified by



Muhammad Atif Khattak
Advocate, Peshawar.


DEPONENT

CNIC NO: 14202-5460557-2
Cell # 0301-8866442

(12)
ANNEX - "A"



**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

Service Appeal No. 879/2024

**BEFORE: MR. AURANQZEB KHATTAK... MEMBER (J)
MISS FAREEHA PAUL ... MEMBER (E)**

Nadia Ashfaq D/O Ashfaq Ahmad, presently posted at GGHS Palosa
Kemanri, R/O villogs & Post office Sabir Abud District Karak.
.... (Appellant)

VERSUS

1. District Education Officer (Female) District Karak.
2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar.
3. Shumaila Rashood CT-PT, presently posted at GGHS No. 1, Karak.
....(Respondent)

Mr. Muhammad Aif Khattak,
Advocate ... For appellants

Mr. Asif Masood Ali Shah
Deputy District Attorney ... For official respondents

Date of Institution..... 25.06.2024
 Date of Hearing..... 04.10.2024
 Date of Decision..... 04.10.2024

JUDGMENT

FAREEHA PAUL, MEMBER (E): The instant service appeal has been instituted under section 4 of the Khyber Pakhtunkhwa Service Tribunal, Act 1974, against the order dated 13.03.2024, whereby the appellant was transferred from GGHS No. 1 Karak to GGHS Palosa Kemanri. It has been prayed that on acceptance of the appeal, the impugned transfer order dated 13.03.2024 might be set aside and the appellant might be allowed to perform her duty at Government Girls Higher Secondary School No. 1 Karak.

Handwritten notes and signatures in the bottom left corner, including the date "29-10-24".

02. Brief facts of the case, as given in the memorandum of appeal, are that the appellant was initially appointed as CT-IT (BPS-12) in Government Girls Higher Secondary School No. 1 Karak on 07.09.2022. Respondent No. 1 issued impugned transfer order dated 13.03.2024, whereby she was transferred to GGHS Palosa Kemanri against the vacant post without assigning any reason and justification. Feeling aggrieved, she preferred departmental appeal to the Director, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar which was not responded; hence the instant service appeal.

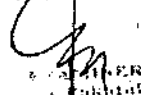
03. Respondents were put on notice. Official respondents submitted their joint written reply/comments. Private respondent No. 3 was served a notice but she did not respond, hence placed ex-parte vide order dated 15.07.2024.

We heard the learned counsel for the appellant as well as learned Deputy District Attorney for the official respondents and perused the case file with connected documents in detail.

04. Learned counsel for the appellant, after presenting the case in detail, argued that the impugned order dated 13.03.2024 was issued in flagrant violation of the Posting & Transfer Policy of the Provincial Government as the appellant did not complete normal tenure of three years. He further argued that the impugned order was neither in the public interest nor in the exigency of service and was passed in utter violation of the policy on the subject. He requested that the appeal might be accepted as prayed for.

05. Learned Deputy District Attorney, while rebutting the arguments of learned counsel for the appellant, argued that the appellant's initial appointment was school-based and she was posted at GGHSS No. 1 Karak.

ATTESTED


Deputy District Attorney
Khyber Pakhtunkhwa
Peshawar



(6)

(14)

Later on, her services were regularized on 12.07.2023 and she was transferred to GGHS Palosa Kimanri in accordance with the rules. He referred to Section 10 of Khyber Pakhtunkhwa Civil Servants Act 1973 and said that every civil servant was bound to serve anywhere in the province in the best public interest and in exigencies of service. He requested that the appeal might be dismissed.

06. From the arguments and record presented before us it transpired that the appellant was appointed as CT-IT in Government Girls Higher Secondary School No. 1 District Karak on adhoc/contract basis on 07.9.2022 and was later on regularized vide a notification dated 12.07.2023. The instant service appeal has been preferred against a transfer order dated 13.03.2024 vide which she was transferred from GGHSS No. 1 Karak to GGHS Palosa Kimanri against the vacant post. The contention of the appellant is that her transfer is premature in the light of policy of posting/transfer of the Provincial Government. As stated by the respondent department in their reply, the present place of posting at Palosa is the nearest station to her home town and that there should be no problem to her while commuting to her place of posting. Learned counsel for the appellant could not deny the fact that in the light of transfer order dated 13.03.2024 the appellant was not affected adversely rather he stressed only on the tenure as per posting/transfer policy.

07. In the light of Section 10 of the Khyber Pakhtunkhwa Civil Servant Act, 1973, the competent authority is empowered to post a civil servant at any place within the province in the best public interest. In the instant case it



ATTESTED



has been noted that the appointment of the appellant was initially school-based but after getting regularization she was transferred. From the date she was initially appointed on 07.09.2022 till her transfer dated 13.03.2024, she had completed almost one year and six months against the normal tenure of two years. We were informed during the course of hearing that she had already assumed the charge at her new place of posing.

08. In view of all the facts narrated before us and the charge assumption by the appellant, the instant appeal has become infructuous and is, therefore, dismissed. Cost shall follow the event. Consign.

09. Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal on this 04th day of October, 2024.

(FAREHA PAUL)
Member (E)

(AURANGZEB KHATTAK)
Member (J)

Fazle Subhan P.S.

Recd to be filed
EXAMINOR
Khyber Pakhtunkhwa
Service Tribunal
Peshawar
29-10-24

Khyber Pakhtunkhwa Service Tribunal, Peshawar	
Application No.	366
Name of Applicant	Atif Kk
Number of Pages/Papers	4-7
Copying Fee	20/-
Urgent/Ordinary	-
Total	20/-
Name & Sign of Clerk	Zeeshan
Date of Completion	28-10-24
Date of Receipt of Money	29-10-24

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MEMO OF COSTS
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 879/2024

Nadia Ashfaq D/O Ashfaq Ahmad, presently posted at GGHS Palosa Kemanri, R/O village & Post office Sabir Abad District Karak.

.... (Appellant)

VERSUS

1. District Education Officer (Female) District Karak.
2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar.
3. Shumaila Rasheed CT-IT, presently posted at GGHSS No. 1, Karak.

....(Respondent)

PRESENT

Mr. Muhammad Atif Khattak,
Advocate

... For appellants

Mr. Asif Masood Ali Shah
Deputy District Attorney

... For respondents

Date of Institution..... 25.06.2024
 Date of Hearing..... 04.10.2024
 Date of Decision..... 04.10.2024

Appellant	Amount	respondents	Amount
1. Stamp for memorandum of appeal	Rs. Nil	1. Stamp for memorandum of appeal	Rs. Nil
2. Stamp for power	Rs. Nil	2. Stamp for power	Rs. Nil
3. Services of processes	Rs. Nil	3. Services of processes	Rs. Nil
4. Pleader's fee	Rs. Nil	4. Pleader's fee	Rs. Nil
5. Security fee	Rs. 100/-	5. Security Fee	Rs. Nil
6. Profess fee	Rs. Nil	6. Process fee	Rs. Nil
7. Costs	Rs. Nil	7. Costs	Rs. Nil
Total	Rs. 100/-	Total	Rs. Nil

Note:- Counsel Fee is not allowed as the required certificate has not been furnished
 Given under our hands and the seal of this Court, this 22nd day of October, 2024.


 (FAREEHA PAUL)
 Member (E)




 (AURANGZEB KHAZRA)
 Member(J)

Fazli Subhan, P.S

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. 879 of 2024

Nadia Ashfaq Versus DEO (F) District Karak and Two others.

S.No. of Order & Date of proceedings	Order or other proceedings with signature of Chairman/Member(s)/Registrar and that of parties or counsel where necessary.
<p>Order-07 04th October, 2024</p>	<p>Present:</p> <ol style="list-style-type: none"> 1. Mr. Muhammad Atif Khattak, Advocate for the appellant present. 2. Mr. Asif Masood Ali Shah, Deputy District Attorney for the official respondents present. <p>01. Vide our detailed judgment consisting of 04 pages, the instant appeal has become infructuous and is, therefore, dismissed. Cost shall follow the event. Consign.</p> <p>02. Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal on this 04th day of October, 2024.</p> <div style="display: flex; justify-content: space-around; margin-top: 20px;"> <div style="text-align: center;">  (FAREEHA PAUL) Member (E) </div> <div style="text-align: center;">  (AURANGZEB KHATTAK) Member (J) </div> </div> <p style="margin-top: 20px;">*Fazle Subhan, P.S*</p>

(18)

"Annexure-B" "B"



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Dated Peshwar the July 30, 2024

NOTIFICATION

No. SO(SM) E&SED/7-1/2020/PT/General: In order to facilitate the Teaching Cadre Employees and to streamline and standardized/automate the process of posting/transfer, the Competent Authority is pleased to approve the E-Posting/Transfer Policy for the Employees of the Teaching Cadre (BS-12 to BS-18) of E&SE Department Khyber Pakhtunkhwa with immediate effect, in the best public interest.

E-POSTING/TRANSFER POLICY OF TEACHING CADRE (BPS-12 to 18) IN E&SE DEPARTMENT KHYBER PAKHTUNKHWA

- i. The introduction of E-Posting/Transfer policy for Teaching Cadre shall supersede all previous E-Posting/Transfer policies in the E&SE Department.
- ii. This policy covers transfers related to intra district transfers of district cadre post and inter district transfers of Provincial cadre posts.
- iii. Transfers on Complaint (Administrative Ground), Mutual basis, inter district and transfer for Operationalization of Newly Established schools, newly created posts will be exempted from the present policy.
- iv. Transfers shall be made at least once a year, preferably at the end of academic year OR during summer vacations.
- v. The vacant positions will be uploaded by the District Education Officers for all teaching cadres (BS-12 to BS-18).
- vi. The Education Monitoring Authority will provide requisite data as per format provided by the Director EMIS.
- vii. Each Competent Authority shall visit the Dashboard of e-Transfer app, check and verify all the particulars of the applicants.
- ✓ **viii.** The teachers appointed on Contract/Adhoc basis shall remain non-transferable until regularized.
- ix. The Teachers in Schools having 2-teachers are not allowed in the e-transfer policy for transfer.
- x. Inter district transfer against senior positions (100% District promotion Quota) i.e. SCT, SDM, SPET, SAT, STT, S-Qari, SPST and PSHT are not allowed neither manually nor through e-transfer.
- xi. Transfer shall be made only against the vacant posts.
- ✗ **xii.** Teachers bearing Minimum tenure of two years on the present post in the present school will be eligible for e-posting/transfer. C
- ✓ **xiii.** In case of same score of two or more candidates, merit will be first on Tenure, then by Date of Birth and if there is tie, then on first come first get basis.
- ✓ **xiv.** Subsequently Transfer orders generated by e-Transfer App will be issued.
- ✗ **xv.** Each Competent Authority shall constitute a Grievance Redressal Cell headed by a BPS-18 or above officer which will resolve the grievances and determine the merit position of the applicants within a week positively.

2. The indicators as per Form (A, B, C & D) will be considered for posting/transfer as per detail given below:

Form-A: Posting/Transfer of Teachers up to BPS 16 except SST (Total Marks 65)

- i. Tenure in the Present Schools against the Present Posts -20 marks
 - a. Normal tenure of 2 years - 0 marks
 - b. Tenure from 2 to 3 years - 8 marks
 - c. Tenure from 3 to 5 years -15 marks
 - d. Tenure more than 5 years -20 marks

Attested

DISTRICT EDUCATION OFFICER

- ii. STR (Total number of Students in the school / Total number of Teachers) - 20 marks (EMA data Source)
 - a. STR at present school is greater than the Desired school - 0 marks
 - b. STR at present and the desired school are equal or at the same level - 10 marks
 - c. STR at the present school is less than desired school - 20 marks
- iii. Disability - 10 marks
10 marks will only be awarded only to those with Physical Disability. Proof required will be Special person CNIC/Standing Medical Board disability certificate.
- iv. Domicile - 05 marks
05 marks will be awarded to those when the desired school is in his/her district of domicile
- v. Spouse - 10 marks
10 marks will be awarded to those whose spouse is posted in the district where the desired school is situated and the desired district is the domiciled district of the applicant

Form-B: Posting/Transfer of SSTs Total Marks - 85

- i. Tenure in the Present Schools against the Present Posts - 20 marks
 - a. Normal tenure of 2 years - 0 marks
 - b. Tenure from 2 to 3 years - 8 marks
 - c. Tenure from 3 to 5 years - 15 marks
 - a. Tenure more than 5 years - 20 marks
- ii. Students Teachers Ratio (STR) - 20 marks (EMA data Source)
 - 1. For SST teacher in High/Higer Secondary School STR is equal to (Total Number of Students in Class 9 & 10 / Number of SST)
 - 2. For SST teacher in Primary/Middle School STR is equal to (Total Number of Students in the school / Total Number of teachers)
 - a. STR at present school is greater than the Desired school - 0 marks
 - b. STR at present and the desired school are equal or at the same level - 10 marks
 - c. STR at the present school is less than desired school - 20 marks
- iii. Disability - 10 marks
10 marks will only be awarded only to those with Physical Disability. Proof required will be Special person CNIC/Standing Medical Board disability certificate.
- iv. Domicile - 05 marks
05 marks will be awarded to those when the desired school is in his/her district of domicile
- v. Spouse - 10 marks
10 marks will be awarded to those whose spouse whose posted in the district where the desired school is situated and the desired district is the domiciled district of the applicant
- vi. Latest Annual SSC Result (of the subjects taught by the teacher) working in High/Higher Secondary Schools - 20 Marks
 - a. 90% or above - 20 marks
 - b. 80% to 90% - 15 marks
 - c. 70% to 80% - 10 marks
 - d. 60% to 70% - 5 marks
 - e. Below 60% - 0 marks.

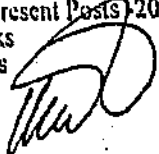

OR

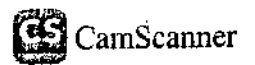
- For SSTs (General) working in Middle/Primary Schools - 20 Marks Overall Students Attendance Rate Percentage as per EMA data
 - a. 90% or above - 20 marks
 - b. 80% to 90% - 15 marks
 - c. 70% to 80% - 10 marks
 - d. 60% to 70% - 5 marks
 - e. Below 60% - 0 marks.

Form C: Posting/Transfer of Subject Specialist (SSS/SS) (Total - 85)

- i. Tenure in the Present Schools against the Present Posts - 20 marks :
 - a. Normal tenure of 2 years - 0 marks
 - b. Tenure from 2 to 3 years - 8 marks

Attested


 Dy. DISTRICT EDUCATION OFFICER
 FEROZEPUR




- (134)
20
- 10
- c. Tenure from 3 to 5 years - 15 marks
 - d. Tenure more than 5 years - 20 marks
- ii. Number of Students in Class-11 & 12 - 20 marks
- a. Number of Students at present school is greater than the Desired school - 0 marks
 - b. Number of Students at present and the desired school are equal or at the same level - 10 marks
 - c. Number of Students at the present school is less than desired school - 20 marks
- iii. Disability - 10 marks
10 marks will only be awarded only to those with Physical Disability. Proof required will be Special person CNIC + Standing Medical Board disability certificate
- iv. Domicile - 05 marks
05 marks will be awarded to those when the desired school is in his/her district of domicile
- v. Spouse - 10 marks
10 marks will be awarded to those whose spouse is posted in the district where the desired school is situated and the desired district is the domiciled district of the applicant
- vi. Latest Annual HSSC Result (of the subjects taught by the teacher) - 20 Marks
- a. 90% or above - 20 marks
 - b. 80% to 90% - 15 marks
 - c. 70% to 80% - 10 marks
 - d. 60% to 70% - 5 marks
 - e. Below 60% - 0 marks

**Form-D: Posting/Transfers of Principals/Head Masters of High/Higher Secondary Schools
(Total Marks - 105)**

- i. Tenure in the Present Schools against the Present Posts - 20 marks
- a. Normal tenure of 2 years - 0 marks
 - b. Tenure from 2 to 3 years - 8 marks
 - c. Tenure from 3 to 5 years - 15 marks
 - d. Tenure more than 5 years - 20 marks
- ii. STR (Total number of Students in the school / Total number of Teachers) - 20 marks (EMA data Source)
- a. STR at present school is greater than the Desired school - 0 marks
 - b. STR at present and the desired school are equal or at the same level - 10 marks
 - c. STR at the present school is less than desired school - 20 marks
- iii. Disability - 10 marks
10 marks will only be awarded only to those with Physical Disability. Proof required will be Special person CNIC Standing Medical Board disability certificate
- iv. Domicile - 05 marks
05 marks will be awarded to those when the desired school is in his/her district of domicile
- v. Spouse - 10 marks
10 marks will be awarded to those whose spouse is posted in the district where the desired school is situated and the desired district is the domiciled district of the applicant
- vi. Latest Annual SSC/HSSC Result of the School - 20 Marks
- a. 90% or above - 20 marks
 - b. 80% to 90% - 15 marks
 - c. 70% to 80% - 10 marks
 - d. 60% to 70% - 5 marks
 - e. Below 60% - 0 marks
- vii. Overall Students Attendance Rate Percentage as EMA data - 20 Marks
- a. 90% or above - 20 marks
 - b. 80% to 90% - 15 marks
 - c. 70% to 80% - 10 marks
 - d. 60% to 70% - 5 marks
 - e. Below 60% - 0 marks

Attested
DY. DISTRICT EDUCATION OFFICER
JHEMALI KADAK

LEGIBLE COPY

21
OFFICE OF THE HEADMISTRESS GGHS PALOSA KIAMNRI (KARAK)

No. 853

Dated 14.5.2024

To,

The Finance Five
Khyber Pakhtunkhwa, Peshawar

Subject: MISSING POSITION CODES FOR THE POST OF HEADMISTRESS BPS-17 AND CT IT BPS-12 AND CORRECTION OF BPS-14 TO BPS-15 FOR THE POST OF PET

Respected Sir,

Please refer to the subject noted above and to state that position codes of Headmistress BPS-17, and CT IT BPS-12 may be restored. It is further requested to please correction may made in PET post of the School from BPS-14 to BPS-15.

EMIS Code 34900
DDO Code KK6073

**Headmistress
GGHS Palosa Kimanri
Karak**

Copy forwarded to the;

1. Director: Elementary and Secondary Education Khyber Pakhtunkhwa.
2. District Education Officer Female, Karak.
3. ADC Finance and Planning Karak
4. District Account Officer Karak.

**Headmistress
GGHS Palosa Kimanri
Karak**

(22)
(CS)

ANNEXE - (C)

OFFICE OF THE HEADMISTRESS GGHS PALOSA KIMANRI (KARAK).

No. 853

Date: 14/05/2021

To

The Finance Five
Khyber Pakhtunkhwa, Peshawar

SUBJECT: MISSING POSITION CODES FOR THE POST OF HEADMISTRESS BPS 17 AND CT IT BPS 12 AND CORRECTION OF BPS 14 TO BPS 15 FOR THE POST OF PET

Respected Sir,


Please refer to the subject noted above and to state that position codes of Headmistress BPS 17, and CT IT BPS-12 may be restored. It is further requested to please correction may be made in PET Post of the school from BPS-14 to BPS-15.

EMIS CODE 34900
DDO CODE KK6073

Headmistress
GGHS Palosa Kimanri
Karak

Copy forwarded to the

1. Director Elementary and Secondary Education Khyber Pakhtunkhwa
2. District Education Officer Female, Karak
3. ADC Finance and Planning Karak
4. District Account Officer Karak


Headmistress
GGHS Palosa Kimanri
Karak Head Mistress
GGHS Palosa Kimanri
Karak

(16)

(23)

ANNEXE - 'D'

To

The District Education Officer,
Female Karak.

It is certified that miss. Nadia CT IT is working on the post having no position code at GGHS Palosa Kimanri (karak) DDO Code KK 6073 due to which her salary is stopped w.e.f 01-04-2024 to till date.

Endst: No 889 Dated 28-10-2024.

Chafda
Headmistress
G.G.H.S Palosa Kimanri
Karak

Headmistress
GGHS Palosa Kimanri

(24)

50	20887	پشاور بار ایسوسی ایشن، خیبر پختونخواہ	
ایڈریس: نگر عیالاق خٹول		PESHAWAR BAR ASSOCIATION	
بار کونسل ایسوسی ایشن نمبر: 64-23-BC			
رابطہ نمبر: 259-259-5335			

بیمارستان خیر خواہ، سروسز ٹرے بیس، پشاور

NADIA ASHFAQ	منجانب:	دعویٰ:
NADIA ASHFAQ		علت نمبر:
بنام		مورخہ:
DEC (FAMAL) KARAK		جرم:
& OTHERS		تھانہ:

بیت تحریر آگے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ آن مقام سپرنٹنڈنٹ پولیس نگر عیالاق خٹول سے موجود کو ذیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کمال اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقررات 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 و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ یا حدت باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: / / 20

المقام: گسواہ شہد الس

مقام کے لیے منظور ہے

Accepted

نوٹ: اس وکالت نامہ کی کاپی قابل قبول ہوگی۔

تاجیہ اشفاق ولد اشفاق احمد، ولدہ لا الخانہ مہتاب آباد، تحصیل و ضلع ملتان