

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

Service appeal No 1009/2024

Dr Abida Azeem Afridi Associate Professor Political Science GGDC Dara Adam
Khel District Kohat

VERSUS

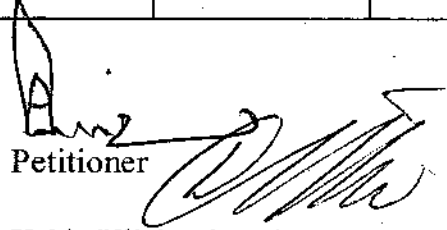
The Chief Secretary Khyber Pakhtunkhwa Peshawar and others

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Dated 19/11/2024

Through


Petitioner

Kabir Ullah Khattak

&


Roeda Khan

Advocate High Court,
Peshawar

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BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

Service appeal No 1009/2024

Dr Abida Azeem Afridi Associate Professor Political Science GGDC Dara Adam
Khel District Kohat

Khyber Pakhtunkhwa
Service Tribunal

VERSUS

Diary No 18150

Date 20-11-24

1. The Chief Secretary Khyber Pakhtunkhwa Peshawar.
2. The Secretary Higher Education archive and library Department Civil Secretariat Peshawar.
3. Mst Sadaf Syed Associate Professor of Philosophy BPS-19 Government Girls Degree College Dara Adam Khel District Kohat.

**AMENDMENT SERVICE APPEAL TO THE EXTENT OF
TRANSFER ORDER DATED 01.11.2024 OF RESPONDENT NO. 3.**

Respectfully Sheweth:

- 1- That the appellant is a civil servant and its present serving as Associate Professor BPS 19 at GGDS Dara Adam Khel Kohat.
- 2- That the appellant is teaching political science and Pakistan studies, since the appellant is, a PHD Scholar in history and obtained, Master's degree, in history, Political Science, International relations and Pakistan Studies.
- 3- That while performing her official duty with respondent department the impugned transfer order dated 23.04.2024 was issued against the appellant whereby the appellant was transferred from GGDC Dara Adam Khel, Kohat to GGDC Sabir Abad Karak. While one Miss Sumaira Anjum was transferred from GGDC Paharpur DI Khan to GGDC Dara Adam Khel against which the appellant filed Departmental appeal on 23.04.2024
- 4- That the appellant submitted the above mention service appeal No 1009/2024 along with suspension application whereby the impugned transfer order dated 23.04.2024 was suspended by this




Hon' able Tribunal and during pendency of the instant service appeal a subsequent transfer order dated 01.11.2024 was issued by the respondent department whereby the respondent No. 3 namely Sadaf Syed was transferred from GGDC Gulshan Rehman Peshawar to GGDC Dara Adam Khel Kohat while Mst Sumaira Anjum was transferred from GGDC Dara Adam Khel Kohat to GGDC Paharpur DI Khan. **(Copy of subsequent transfer order 01.11.2024 is attached as annexure-A).**

- 5- That the appellant submitted an impleadment application on 08.11.2024 before this Hon' able Tribunal for impleadment of respondent No 3 in the penal of respondents being a necessary party which was allowed and direction was given to the appellant to submit an amendment appeal on 23.11.2024. **(Copy of order sheet dated 23.11.2024 is attached as annexure-B).**

It is, therefore, humbly prayed that on acceptance of the instant amendment appeal the impugned transfer order dated 23.04.2024 and subsequent order dated 01.11.2024 to the extent of respondent No 3 may kindly be set aside being passed against the transfer posting policy, law and rules.

Dated 19/11/2024

Through


Petitioner

Kabir Ullah Khattak
&

Roeeda Khan
Advocate High Court,
Peshawar

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BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

Service appeal No 1009/2024

Dr Abida Azeem Afridi Associate Professor Political Science GGDC Dara Adam
Khel District Kohat

VERSUS

The Chief Secretary Khyber Pakhtunkhwa Peshawar and others

Affidavit

I, Dr Abida Azeem Afridi Associate Professor Political Science GGDC Dara Adam Khel District Kohat 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



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**GOVT. OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES &
LIBRARIES DEPARTMENT**

Dated Peshawar the 01st November, 2024

NOTIFICATION

NO.SO(C-III)/HED/1-6/2024/PSB/BS-18 to BS-19: Consequent upon their promotion to the post of female Associate Professors (BS-19) of college cadre as notified vide notification of even No. dated 04.04.2024, postings/adjustments of the following female teaching staff of college cadre in Higher Education Department are hereby ordered, with immediate effect, in the best public interest:-

S#	Name/Designation/BPS	From	To	Remarks
1.	Ms. Andaleeb Azam, Assistant Professor of Chemistry (BS-18)	GGDC No.1 Hayatabad, Peshawar	As Associate Professor (BS-19) at GGDC Dabqari, Peshawar	Vice Sr. No.01 of adjustment
2.	Ms. Asma Ijaz, Assistant Professor of Chemistry (BS-18)	GGPGC Mardan	As Associate Professor (BS-19) at GGPGC Mardan	AVP
3.	Ms. Shah Rukh, Assistant Professor of Chemistry (BS-18)	GGDC Takht Bhai, Mardan	As Associate Professor (BS-19) at GGDC Garhi Kapoora, Mardan	AVP
4.	Ms. Saiqa, Assistant Professor of Chemistry (BS-18)	GFC (W), Peshawar	As Associate Professor (BS-19) at GCGC Peshawar	Vice Sr. No.02 of adjustment
5.	Ms. Nudrat Nazir, Assistant Professor of English (BS-18)	GGPGC Haripur	As Associate Professor (BS-19) at GGDC Zalda, Swabi	AVP
6.	Ms. Gul Snowbar Akhlaq Khan, Assistant Professor of HPE (BS-18)	GFC (W), Peshawar	As Associate Professor (BS-19) at GFC (W), Peshawar	Vice Sr. No.07 of adjustment
7.	Ms. Maria Sultan, Assistant Professor of Biology (BS-18)	GGDC No.2, Haripur	As Associate Professor (BS-19) at GGPGC No.1, Abbottabad	AVP
8.	Ms. Saima Naz, Assistant Professor of Physics (BS-18)	GGDC Mallkpura, Abbottabad	As Associate Professor (BPS-19) at GGDC Matta, Swat	AVP
9.	Ms. Seema Rehman, Assistant Professor of English (BS-18)	Dy. Director HEART, Peshawar	As Associate Professor (BPS-19) at GGDC Gulshan Rehman, Peshawar	Vice Sr. No.03 of adjustment

10.	Ms. Naila Fida, Assistant Professor of Botany (BS-18)	GGDC Sawal Dher, Mardan	As Associate Professor (BS-19) at GGDC Timergara, Dir Lower	AVP
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2. in addition to above, the following consequential postings/transfers of the teaching staff of college cadre are hereby ordered:-

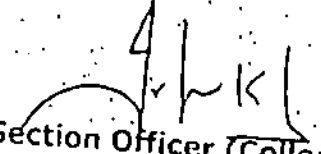
S #	Name/Designation/BPS	From	To	Remarks
1.	Ms. Fatima Bibi, Associate Professor of Law (BS-19)	GGDC Dabgari, Peshawar	GGDC Topi, Swabi	AVP
2.	Ms. Faiza Rasheed, Associate Professor of Mathematics (BS-19)	GCGC Peshawar	GGDC Tajobibi, Charsadda	Vice Sr. No.5 of adjustment
3.	Ms. Sadaf Syed, Associate Professor of Philosophy (BS-19)	GGDC Gulshan Rehman, Peshawar	GGDC Dara Adam Khel, Kohat	Vice Sr. No.04 of adjustment
4.	Ms. Sumera Anjam, Associate Professor of Mathematics (BS-19)	GGDC Dara Adam Khel, Kohat	GGDC Paharpur, D.I.Khan	AVP
5.	Ms. Nadia Nisar, Associate Professor of Zoology (BS-19)	GGDC Tajobibi, Charsadda	GPGC Bannu	AVP
6.	Ms. Sadaf Umar, Associate Professor of Mathematics (BS-19)	GGDC Daggur, Buner	As Principal at GGDC Daggur, Buner	AVP of BS-20 in OPS
7.	Ms. Salma Rehman, Associate Professor of Home Economics (BS-19)	GFC (W), Peshawar	GGDC Gulshan Rehman, Peshawar	AVP

-Sd-
SECRETARY

ENDST: NO. & DATE EVEN:

Copy of the above is forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director Higher Education, Khyber Pakhtunkhwa, Peshawar.
3. Directors, Regional Directorates of Higher Education.
4. Director-IT, HEMIS Cell, Higher Education Department.
5. Principal, Govt. Colleges concerned.
6. District Accounts Officers, concerned.
7. PS to Secretary Higher Education Department.
8. Officers concerned.
9. Master file.


Section Officer (Colleges-III) 01/11/24

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Annex. B



KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

Service Appeal No. 1009 of 2024

Dr. Abida Azeem Afridi versus The Chief Secretary Khyber Pakhtunkhwa, Peshawar and others.

S.No. of Order & Date of proceeding	Order or other proceedings with signature of Chairman/Member(s)/Registrar and that of parties or counsel where necessary
<p>Order-10 13th November, 2024.</p>	<p>Present:</p> <ol style="list-style-type: none">1. Miss. Roeeda Khan, Advocate on behalf of appellant.2. Mr. Asif Masood Ali Shah, Deputy District Attorney, on behalf of official respondents. <p>Learned counsel for the appellant submitted that, pursuant to Notification dated 01st November 2024, private respondent No. 3, Ms. Sumera Anjum, who was previously transferred to the appellant's position, has now been further transferred to GGDC Pharpur, D.I. Khan. Additionally, Ms. Sadaf Syed has been transferred to GGDC Dara Adam Khel, Kohat. In light of these developments, the learned counsel requested leave to submit an amended appeal to reflect these recent changes. The request is granted. The learned counsel for the appellant is directed to file the amended appeal within one week. She also requested for suspension of Notification dated 01st November 2024. In the meantime, the operation of the impugned Notification dated 01st November 2024 shall remain suspended to the extent of Ms. Sadaf Syed, Associate Professor of Philosophy (BS-19), if the same has not already been acted upon. To come up for amended appeal on 26.11.2024 before the D.B at the Principal Seat, Peshawar. <i>Parcha Peshi</i> given to the parties.</p> <p>(Fareeha Paul) Member (Executive)</p> <p>(Aurangzeb Khattak) Member (Judicial)</p> <p><i>*Naeem Amin*</i></p>

Certified to be true copy
E. J. JINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar
19-11-2024

Khyber Pakhtunkhwa 801 Tribunal, Peshawar

Application No. _____ Date 19-11-2024
Name of Applicant Wasim
Number of Words/Pages 1
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Date of Completion of Copy 19-11-24
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