

Form- A


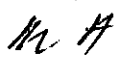
FORM OF ORDER SHEET

Court of _____

Case No.-

3184

/2020


| S.No. | Date of order proceedings | Order or other proceedings with signature of judge |
|-------|---------------------------|--|
| 1 | 2 | 3 |
| 1- | 20/04/2020 | <p>The appeal of Asfandyar resubmitted today by Mr. Hamad Hussain, Advocate may be entered in the Institution Register and put up to the Learned Member for proper order please.</p> <p style="text-align: right;"> REGISTRAR - 20/4/2020</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>30-4-2020</u></p> <p style="text-align: right;"> MEMBER</p> |
| 2- | | |

30.04.2020

Counsel for the appellant Asfandyar alongwith appellant present. Preliminary arguments heard.

It was contended by the learned counsel for the appellant that the appellant is serving in Education Department as Senior Primry School Teacher. He was transferred from Government Primry Schjool Shahjee Abad to Government Primary School No. 1 Aza Khel vide order dated 15.01.2020 on rationalization basis. It was further contended that the appellant filed departmental appeal against the impugned order on 18.01.2020 but the same was not responded, hence the present service appeal on 20.04.2020. It was further contended that the appellant has enmity in village Aza Khel where he was transferred on rationalization basis and in this respect the appellant has also annexed FIR No. 532 dated 24.09.2016 u/s 324-34-427/PPC P.S Matani according to which the son of the appellant has been fired by his enemies belonging to village Aza Khel. It was further contended that no other employee has been transferred at Government Primary School Shahjee Abad at the place of the appellant. It was further contended that the appellant has not relinquished the charge so far and is performing his duty in the said school of Shahjee Abad, therefore, the impugned order of transfer of the appellant on rationalization basis is illegal and liable to be set aside. The contentions raised by learned counsel for the appellant need consideration. The appeal is admitted to regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to the respondents for submission of reply/comments on 07.05.2020 before S.B.

Counsel for the appellant has also submitted an application for suspension of impugned order. Notice of the same be issued to the respondents. In the meanwhile status quo be maintained till next date.



(M. AMIN KHN KUNDI)
(MEMBER-J)

Appellant Directed
Security & Process Fee

30/4/20

07.05.2020

Learned counsel for the appellant present. Written reply not submitted. None is present on behalf of respondents. Notice be issued to the respondents for written reply/comments. Adjourn. To come up for written reply/comments on 29.05.2020 before S.B. In the meanwhile, status quo be maintained till the date fixed.


(M. AMIN KHN KUNDI)
(MEMBER-J)

29.05.2020

Appellant with counsel present.

On the last date of hearing office was required to issue notices to the respondents for submission of written reply/comments. The record, however, reveals that requisite notices were not issued. Instant matter is, therefore, adjourned to 12.06.2020. The office shall ensure issuance of notices to the respondents for the date fixed. Status quo granted on 30.04.2020 shall remain operative till next date of hearing.


Chairman

12.06.2020

Appellant with counsel present. Addl: AG for respondents present. Written reply not submitted. Learned AAG seeks time for submission of written reply. To come up for written reply/comments on 26.06.2020 before S.B. Status-quo granted on 30.04.2020 shall remain operative till next date of hearing.

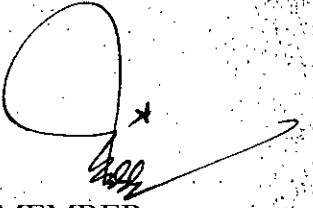

(MAIN MUHAMMAD)
MEMBER

26.06.2020

Clerk to counsel for the appellant and Addl: AG for respondents present.

Written reply not submitted. Learned AAG seeks time to contact the respondents. Last opportunity granted.

Adjourned to 14.07.2020 before S.B. Status-quo granted on 30.04.2020 shall remain operative till next date of hearing.



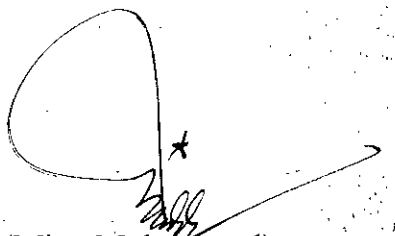
MEMBER

14.07.2020

Counsel for the appellant and Addl: AG alongwith Mr. ~~Muhammad Arshad ADC~~ for respondents present.

Written reply not submitted despite last opportunity. Requested for further adjournment. Adjournment granted subject to payment of cost of Rs. 1000/- which shall be borne by respondents from their own pockets.

Adjourned to 29.07.2020 before S.B. Status-quo granted on 30.04.2020 shall remain operative till next date of hearing..



(Mian Muhammad)
Member(E)

3184/2020

29.07.2020

Counsel for the appellant and Irfan Ali, Asstt. on behalf of respondent No. 2 and Arshad, ADEO on behalf of respondent No. 3 alongwith Addl. AG present. Respondent No. 4 also present in person.

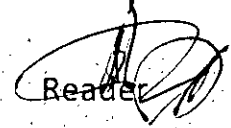
Respondent No. 3 has furnished reply/comments (placed on record). Representative of respondent No. 2 as well as respondent No. 4 rely on the reply/comments of respondent No. 3. Representative of the respondents also paid cost of Rs. 1000/- (Rupees One thousand) which was handed over to learned counsel for the appellant, receipt thereof obtained and placed on record.

The appeal is assigned to D.B for arguments on 13.08.2020. The appellant may furnish rejoinder, within ten days, if so advised. Status quo granted on 30.04.2020 shall remain operative till the date fixed.


Chairman

_____.2020

Due to COVID19, the case is adjourned to
___/___/2020 for the same as before.


Reader

13.08.2020

Due to summer vacations case to come up for the same on
26.10.2020 before D.B.


Reader

26.10.2020

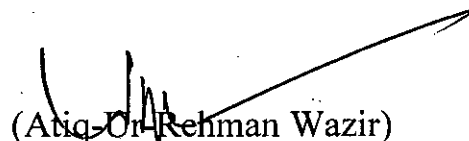
Proper D.B is on Tour, therefore, the case is
adjourned for the same on 21.12.2020 before D.B.

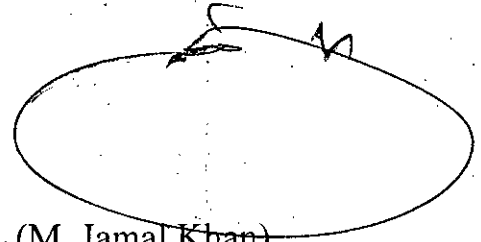

Reader

21.12.2020

Mr. Hamad Hussain Advocate, counsel for appellant and Zara Tajwar, learned Deputy District Attorney alongwith Mr. Arshad ADO for respondents present.

Learned counsel is seeking time for submission of rejoinder and arguments. Request is acceded to, directing him to submit rejoinder positively. File to come up for arguments on 13.01.2021 before D.B. In the meanwhile status quo be maintained till the date fixed.


(Atiq-ur-Rehman Wazir)
Member (E)

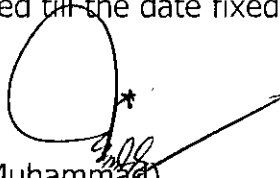

(M. Jamal Khan)
Member (J)


13.01.2021

Appellant present through counsel.

Asif Masood Ali Shah learned Deputy District Attorney alongwith Tosef ur Rehman ADEO for respondents present.

Former submitted rejoinder and made a request for adjournment. Adjourned. To come up for arguments on 22.01.2021 before D.B. In the meanwhile status-quo be maintained till the date fixed.



(Mian Muhammad)
Member (E)

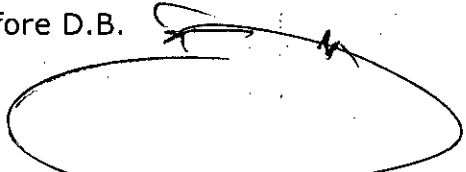

(Rozina Rehman)
Member (J)

22.01.2021

None present on behalf of appellant. Muhammad Rasheed, learned Deputy District Attorney alongwith Touseef Ur Rehman ADO (litigation) for respondents present.

Notice be issued to the appellant as well as his respective counsel on 19.02.2021 for arguments before D.B.



(ATIQ UR REHMAN WAZIR)
MEMBER (E)

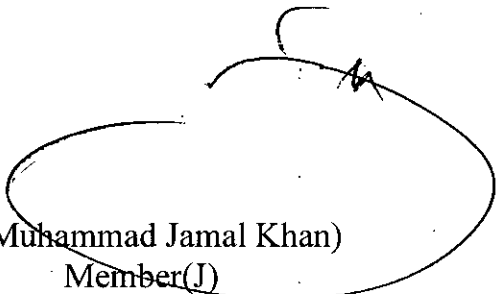

(MUHAMMAD JAMAL KHAN)
MEMBER (J)

12.02.2021

Appellant in person present. Mr. Asif Masood, Deputy District Attorney for respondents present.

Appellant seeks adjournment due to general strike of the Bar. The case is adjourned to 19.03.2021 for arguments before D.B. In the meanwhile status-quo be maintained till the date fixed.


(Mian Muhammad)
Member (E)


(Muhammad Jamal Khan)
Member(J)

19.03.2021

Counsel for appellant and Mr. Noor Zaman Khattak, District Attorney for the respondents present.

Former requests for adjournment as he has to attend wedding ceremony of his friend today. Adjourned to 06.04.2021 for arguments before D.B. Status-quo ordered on the previous date shall continue its operation till the next date.



(SALAH-UD-DIN)
MEMBER (JUDICIAL)



CHAIRMAN

06.04.2021

Due to demise of Hon'able Chairman, the Tribunal is defunct, therefore, the case is adjourned to 30.04.2021 for the same.




Reader

30.4.21

Due to COVID-19, The case is adjourned to 5.8.2021 for the same.



Reader

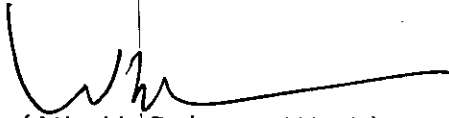


Asfandiyar

05.08.2021

Counsel for the appellant present. Mr. Mr. Javed Ullah, Assistant Advocate General alongwith Touseef-Ur-Rehman ADO for respondents present.

Partial arguments have been heard. The main grievance of the appellant seems to length with elements of enmity in local area besides his objection that posting of the appellant has not requirement of Rationalization Policy at the particular school. Let the department with alternate proposal for adjustment of the appellant. Obviously, within reasonable parameters. To come up on 20.09.2021 before D.B.



(Atiq Ur Rehman Wazir)
Member (E)



Chairman


20.09.2021

Counsel for appellant present.

5105 5-8

Muhammad Addeel Butt learned Additional A.G for respondents present.

Request for adjournment was made (on behalf) of appellant; granted. To come up for arguments on 22.10.2021 before D.B.



(Rozina Rehman)
Member (J)




Chairman

22.10.2021

Counsel for the appellant present.

Mr. Riaz Khan Paindakheil, Assistant Advocate General for respondents present.

Due to paucity of time, arguments could not be heard. Adjourned. To come up for arguments on 24.12.2021 before D.B.

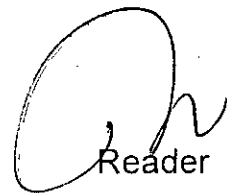

(ATIQ UR REHMAN WAZIR)
MEMBER (E)


(ROZINA REHMAN)
MEMBER (J)

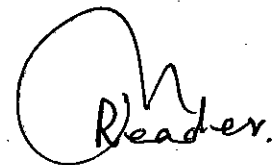
24.12.2021

Due to winter vacations, case is adjourned to 08.02.2022 for the same as before.

8-2-2022


Reader

Due to retirement of the Honorable Chairman the case is adjourned to come up for the same as before on 30-5-2022


Reader.

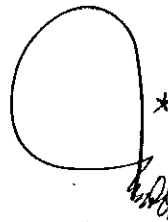
SA 3184/2020

30th May, 2022

Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl. AG alongwith Arshad Ali, ADO (Litigation) for the respondents present.

Learned counsel for the appellant has produced copy of Corrigendum bearing Endst. No. 7874-78, dated 09.02.2022, whereby grievance of the petitioner has been redressed. Placed on file. He requested for withdrawal of the appeal. As a token of admission of his submission he signed the margin of the order sheet. Consign.

3. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal this 30th day of May, 2022.*



(Mian Muhammad)
Member(E)



(Kalim Arshad Khan)
Chairman

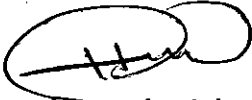
3
no
signature
R

The appeal of Mr. Asfandar Khan received today i.e. on 20.04.2020 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.


1- Memo. of appeal may be got signed from the appellant.

No. 1009 /S.T,

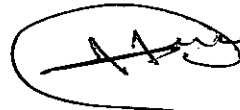
Dt. 20-04/2020



Mr. Hamad Hussain, Advocate, Peshwar.


REGISTRAR 20/4/2020
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

after general objection
and resubmitted



20/4/2020

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO. 3184 /2020

Mr. Asfandyar Khan S.PST Govt Primary School Shahjee Abad Circle
Mattani, Peshawar**Petitioner**

VERSUS

Secretary to Govt of Khyber Pukhtunkhwa Elementary &
Secondary Education Department, Peshawar and others
.....**Respondents**

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| 4 | copy of impugned order dated 15/01/2020 along better copy | A | 7-9 |
| 5 | Copy of departmental dated 15/01/2020 along better copy | B | 10-11 |
| 6 | Copy of F.I.R is attached along better and EMAS copy | C | 12-19 |
| 7 | Wakalatnama | | 20 |

Dated:

Asfandyar Khan
Appellant

Through

Hamad Hussain
Hamad Hussain
Advocate High court Peshawar
Mobile: 03120952763

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO. 3184 /2020

Mr. Asfandyar Khan S.PST Govt Primary School Shahjee Abad Circle
Mattani, PeshawarPetitioner

VERSUS

- 1) Secretary to Govt of Khyber Pukhtunkhwa Elementary & Secondary Education Department, Peshawar.
- 2) Director Elementary & Secondary Education, Khyber Pukhtunkhwa Peshawar.
- 3) District Education Officer (Male) Peshawar.
- 4) SDEO Male Town 4 Peshawar.Respondents

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED / TRANSFER ORDER BEARING NO. 4388-4434 DATED 15/01/2020 ISSUED BY DISTRICT EDUCATION OFFICER PESHAWAR.

PRAYERS:-

Filed to-day
Registrar
20/4/2020

MOST HUMBLY PRAYED THAT ON ACCEPTANCE THE INSTANT SERVICE APPEAL, THE IMPUGNED TRANSFER BEARING NO. 4388-4434 DATED 15/01/2020 MAY VERY KINDLY BE DECLARED ILLEGAL, UNLAWFUL AND THE APPELLANT BE PLACED IN GOVT PRIMARY SCHOOL SHAHJEE ABAD CIRCLE MATTANI, PESHAWAR AS PER POLICY OF GOVERNMENT OF KHYBER PAKHTUNKHWA 40 STUDENTS ONE TEACHER RATIO.

Re-submitted to -day
and filed.

Registrar
20/4/2020

Impugned Transfer order date 15/01/2020
Departmental appeal date 18/01/2020
Stipulated time 90 days on 18/04/2020
Filing of instant Service Appeal on/...../2020

(2)

RESPECTFULLY SHEWETH,

My humble submission are as under.

Facts

1. That the appellant is serving in the Education Department being Senior PST / Head Teacher Govt Primary School Shahjee Abad Circle Mattani, Peshawar.
2. That the appellant is performing his duties with great zeal, enthusiastically and no complaints what so ever yet has been received against the appellant till during service.
3. That the respondent No 3, District Education officer Male Peshawar issued transfer order endst No. 4388-4434 dated 15/01/2020 under rationalization policy, wherein the appellant was also transferred from Govt Primary School Shahjee Abad Circle Mattani, Peshawar to Govt Primary School Azakhel No. 1 Peshawar circle Mattani, while there is no need of further teachers as per strength of ratio 40students one Teacher according to Policy. **[copy of impugned order dated 15/01/2020 is attached as Annex- A]**
4. That on 18/01/2020 the appellant filed departmental appeal to the District Education Officer against the transferred order dated 15/01/2020 but no response yet has been communicated to the appellant after passing stipulated time. **(Copy of departmental appeal is Annex B).**
5. That after passing stipulated period [90] days, hence the present appeal under section 4 of Khyber Pakhtunkhwa Service Tribunal with the following grounds.

Grounds:-

- A. That the transfer of the appellant is unlawful, illegal void ab-initio and against the Law, Rules, Policy of the Provincial Government as per ratio 40 students one Teacher and judgments of the superior courts which is liable to be set aside.
- B. That total strength of students in Govt Primary School Shahjee Abad Circle Mattani, Peshawar is 133 and three [03] teachers are working including the appellant in the said school.



- C. That there is Thirteen [13] Teachers are working in GPS Azakhel No 1 Mattani Peshawar, wherein already three [03] Teachers are surplus as 40 students' one Teacher ratio while the appellant transferred illegal.
- D. That there is life threatened to the appellant locate nearby GPS Azakhel No. 1 due to enmity, where the appellant has transferred. That in this connection F.I.R also been logged in PS Mattani against son of the appellant namely Shehryar [**copy of F.I.R is attached as Annex- C**]
- E. That transferred of the appellant is based on personal ill and will & malafide intention as Respondent No. 3 District Education Officer namely Irfan Ali have ulterior motives during past Posting Transfer as SDEO Peshawar with the elder brother of the appellant namely Sarfaraz Khan Ex SDEO Peshawar, wherein this Honourable Tribunal has delivered judgment in favour of the elder brother of the appellant, Sarfaraz Khan Ex SDEO Peshawar and he was remained SDEO Peshawar.
- F. That the respondent No. 3 have personal grudges with the appellant family mentioned above due to which the appellant have targeted/ mentally burnt and transferred that school where is already [03] teachers are surplus, furthermore the appellant have personal enmity locate the said school instead of the parent school wherein the appellant already performing duty while there is no need of teacher as per policy 40 students one teacher.
- G. That in the impugned transferred order many suffered teachers filed appeal for retention them in their present schools, they were retained while appeal of the appellant was ignored and no response given to the appellant till date which is sheer discrimination with the appellant than similarly placed teachers.
- H. That any others grounds will be taken at the time of arguments with the permission of this Service Tribunal.

It is, therefore, most humbly prayed that on acceptance of the instant appeal the appellant transferred may very kindly be declared illegal, unlawful void ab-initio and against the Law, Rules, Policy of the Provincial Government under 40 students ratio per one Teacher and as per judgments of the superior courts which is liable to be set aside and the appellant may kindly

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be retained in Govt Primary School Shahjee Abad Circle Mattani, Peshawar as per 40 student ratio one Teacher policy.

Any other relief if deemed fit may also be granted which have not been taken in rest of paras of the instant appeal.

Asfandyar
Appellant
Petitioner

Through

Hamad Hussain
(HAMAD HUSSAIN)
Advocate High Court
Peshawar
Mobile 03329122812

Affidavit:-

I, Asfandyar S. PTS / HM GPS Shahjee Abad Mattani Peshawar do hereby solemnly affirm that the contents of the instant Service Appeal are true correct with the best of my knowledge that no such like appeal has earlier been filed between the parties in this Honourable Tribunal

ATTESTED
[Stamp: SWAID HUSSAIN, Peshawar, dated 20.04.2020]

Asfandyar
DEPONENT

5

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO. /2020

Mr. Asfandyar Khan S.PST Govt Primary School Shahjee Abad Circle
Mattani, Peshawar**Petitioner**

VERSUS

1. Secretary to Govt of Khyber Pukhtunkhwa Elementary & Secondary Education Department, Peshawar.
2. Director Elementary & Secondary Education, Khyber Pukhtunkhwa Peshawar.
3. District Education Officer (Male) Peshawar.
4. SDEO Male Town 4 Peshawar.**Respondents**

**APPLICATION FOR SUSPENTION OF IMPUGNED ORDER
DATED 15/01/2020 WHEREIN THE APPELLANT WAS
TRANSFERRED FROM GPS SHAHJEE ABAD MATTANTI TO
GPS AZAKHEL NO. 1 MATTANI PESHAWAR.**

RESPECTFULLY SHEWETH,

Facts

1. That the appellant is serving in the Education Department being Senior PST / Head Teacher Govt Primary School Shahjee Abad Circle Mattani, Peshawar.
2. That there is Thirteen [13] Teachers are working in GPS Azakhel No 1 Mattani Peshawar, wherein already three [03] Teachers are surplus as 40 students' one Teacher ratio while the appellant transferred illegally.
3. That the respondent No 3, District Education officer Male Peshawar issued transferred order on 15/01/2020 vide Endst 4388-4434 under rationalization policy, wherein the appellant was transferred from Govt Primary School Shahjee Abad Circle Mattani, Peshawar to Govt Primary School Azakhel No. 1 Peshawar circle Mattani.

6

4. That there is life threatened to the appellant locate nearby GPS Azakhel No. 1 due to enmity where the appellant has transferred. That in this connection F.I.R also been logged in PS Mattani against the son of the appellant namely Shehryar.
5. That transferred of the appellant is based on personal ill and will & malafide intention as Respondent No. 3 District Education Officer namely Irfan Ali have ulterior motives during past Posting Transfer as SDEO Peshawar with the elder brother of the appellant namely Sarfaraz Khan Ex SDEO Peshawar, wherein this Honourable Tribunal has delivered judgment in favour of the elder brother of the appellant, Sarfaraz Khan Ex SDEO Peshawar and he was remained SDEO Peshawar.
6. That the respondent No. 3 have personal grudges with the appellant family mentioned above due to which the appellant have targeted and transferred that school where is already [03] teachers are surplus, furthermore the appellant have personal enmity locate the said school instead of the parent school, wherein the appellant already performing duty, while there is no need of teacher as per policy 40 students one teacher.

It is, therefore, most humbly prayed that on acceptance of the instant appeal the appellant transferred order Endst No. 4388-4434 dated 15/01/2020 may very kindly be suspended till final decision of the instant appeal in norms of natural justice and for sake of life of the appellant as there is locate enmity of the appellant were is transferred .

(HAMAD HUSSAIN)

Advocate High Court Peshawar

Affidavit:-

I, Asfandyar S. PTS / HM GPS Shahjee Abad Azakhel Mattani Peshawar do hereby solemnly affirm that the contents of the instant Service Appeal are true correct with the best of my knowledge that no such like appeal has earlier been filed between the parties in this Honourable Tribunal.

Attested
Asfandyar S. PTS
20.4.2020
ADVOCATE

Asfandyar
DEPONENT

In pursuance of the directions of the E&SE Department & Deputy Commissioner Peshawar on the basis of IMU for the exercise of rationalization of P.Ty School Teachers at GPSs of Town-IV Peshawar, and to fill the stop gaps of teaching staff in single teacher schools on need basis, adjustment order of the following teachers on rationalization to /to the following PSTs/SPSTs is hereby issued in the schools shown against each their names on their own pay & OPS in the best interest of public students service with immediate effect:

Annexure - "A"

| S. No | Name & Designation of Teacher | Transferred from | | Transferred To | | Remarks |
|-------|-------------------------------|------------------|-------------------------------|----------------|-----------------------------|--|
| | | EMIS | School | EMIS | School | |
| 1 | Mr. Muhammad Qasim SPST | 20985 | GPS Khur Khurani | 20876 | GPS Khazanday Adizai | Rationalization/need basis |
| 2 | Mr. Ibramullah SPST | 21010 | GPS No.1 Maryam Zai | 21009 | GPS No.1 Maryamzai | Rationalization/need basis |
| 3 | Mr. Siraj Hussain PST | 20826 | GPS Bagh Aman Kheil | 21009 | GPS No.3 Maryamzai | Rationalization/need basis |
| 4 | Mr. Muhammad Zikria PST | 21095 | GPS Rehmat Abad | 21009 | GPS No.3 Maryamzai | Rationalization/need basis |
| 5 | Mr. Syed Nour Ali Shah SPST | 20816 | GPS No.2 Azakheil | 20815 | GPS No.1 Azakheil | Rationalization/need basis |
| 6 | Mr. Sabir Hussain SPST | 20883 | GPS No.1 Faqir Hanr | 28692 | GPS No.2 Faqir Hanr | Rationalization/need basis |
| 7 | Mr. Atab Hussain SPST | 21031 | GPS Mera Aza Kheil | 22885 | GPS Mustarika Sherker | Rationalization/need basis |
| 8 | Mr. Asfandyar Khan SPST | 30433 | GPS Shahjee Abad | 320815 | GPS No.1 Azakheil | Rationalization/need basis |
| 9 | Mr. Azam Khan SPST | 30123 | GPS Garhi Arsala Khan | 20896 | GPS Garhi Hanat | Rationalization/need basis |
| 10 | Mr. Mirzaminul Shah PST | 30331 | GPS Garhi Wali Khan | 32132 | GPS Mata Dargay | Rationalization/need basis |
| 11 | Mr. Siraj Khan PST | 20932 | GPS GPS Gul Ahmad Kili | 20920 | GPS Garhi Fazal Rahman | Rationalization/need basis |
| 12 | Mr. Qaiser Khan SPST | 30402 | GPS No.1 Khulizai Adezai | 20802 | GPS No.2 Adezai | Rationalization/need basis |
| 13 | Mr. Fahir Mahmood SPST | 20873 | GPS Darwazgil | 21024 | GPS No.2 Mattani | already posted in stop gaps |
| 14 | Mr. Muhammad Nishan PST | 21017 | GPS No.1 Masho Pely | 21018 | GPS No.2 Masho Pely | Rationalization/need basis |
| 15 | Mr. Khan Alam PST | 21017 | GPS No.1 Masho Pely | 21057 | GPS No.2 Musharrazai | Rationalization/need basis |
| 16 | Mr. Shakeel PST | 21119 | GPS Shaheed Garhi Masho Garga | 21129 | GPS SHEEN DRUNG | Rationalization/need basis & stop gaps |
| 17 | Mr. Ibramullah PST | 20940 | GPS Haji Muhammad Noor Kili | 20889 | GPS Garhi Ahmad Khan | Rationalization/need basis |
| 18 | Mr. Kaplan Sher PST | 21033 | GPS MIRA BALARZAI NO.2 | 20962 | GPS No.1 Kagawala Uthmanzai | Rationalization/need basis |
| 19 | Mr. Khalid Masrud SPST | 21178 | GPS MOHAJAT KHAN KALI | 20820 | GPS No.2 Thalabe | Rationalization/need basis |

ATTESTED

| | | | | | | |
|----|----------------------------|-------|-----------------------------|-------|--------------------------------|---|
| 24 | Mr. Zakirullah PST | 20889 | GPS Cinthi Ahmad Kham | 20940 | GPS Haji Muhammad Noor Kili | Rationalization/nc basis |
| 25 | Mr. Haqumyar Khan SPSI | 20686 | GPS No.3 Huzar Khwani | 20684 | GPS No.1 Huzarkhwani | Rationalization/nc basis |
| 26 | Mr. Ajmal Khan PST | 20685 | GPS No.2 Huzar Khwani | 31055 | GPS No.2 Muzazi | Rationalization/nc basis |
| 28 | Mr. Muhammad Zahid SPSI | 38696 | GPS Shabaha Telahand | 21155 | GPS No.3 Telahand | Rationalization/nc basis |
| 29 | Mr. Alauzab SPSI | 20908 | GPS Cinthi Khan-Wali | 21166 | GPS No.2 Umar Payan | Rationalization/nc basis |
| 30 | Mr. Sajjad Khan PST | 21012 | GPS MASHO GAGAR No.1 | 21166 | GPS No.2 Umar Payan | being disabled Rationalization/nc basis |
| 31 | Mr. Jamil Hussain PST | 20684 | GPS No.1 Mera Umar Payan | 38699 | GPS No.4 Umar Miana | Rationalization/nc basis |
| 32 | Mr. Hussam Zada SPSI | 38699 | GPS No.4 Umar Miana | 21041 | GPS No.3 Mera Umar Payan | Rationalization/nc basis |
| 33 | Mr. Niaz Ali Khan SPSI | 21041 | GPS No.3 Mera Umar Payan | 38699 | GPS No.3 Umar Miana | Rationalization/nc basis |

Notes:-

- i- TNA/DA not allowed.
- ii- Charge report should be submitted to all concerned.
- iii- Necessary entries should be made in their respective record.

Witnessed

District Education Officer
Male Peshawar

Under No. 4388-4434 / Dated: 15/11/2020

Copy forwarded to the:-

- 1- SIDCO (Male) Town-V Peshawar
- 2- ASDCOs (Male) Circles Badaber, Mattani & Umar Peshawar

(9)

BETTER COPY

In pursuance of the directions of the E&SI: Department & Deputy Commissioner Peshawar on the reports of IMU for the exercise of rationalization of Pry School Teachers at GPSs of Town-IV Peshawar, and to fill the stop gap of teaching staff in single teacher schools on need basis, adjustment order of the following teachers on rationalization into the following PSTs / SPSTs is hereby issued in the schools shown against each their names on their own pay & BPS in the best interest of public students service with immediate effect:

| S.No | Name & Designation of Teacher | Transferred from | | Transferred to | | Remarks |
|------|-------------------------------|------------------|--------------------------|----------------|-----------------------|-----------------------------|
| | | EMIS | School | EMIS | School | |
| 1. | Mr. Muhammad Qasim SPST | 20985 | GPS Khur Khurai | 20876 | GPS Khandaq Adizai | Rationalization/ need basis |
| 2. | Mr. Ihsanullah SPST | 21010 | GPS No.4 Maryam Zai | 21009 | GPS No.3 Maryamzai | Rationalization/ need basis |
| 3. | Mr. Siraj Hussain PST | 20826 | GPS Bagh Mian Kheil | 21009 | GPS No.3 Maryamzai | Rationalization/ need basis |
| 4. | Mr. Muhammad Zikria PST | 21095 | GPS Rehmat Abad | 21009 | GPS No.3 Maryamzai | Rationalization/ need basis |
| 5. | Mr. Syed Noor Ali Shah SPST | 20816 | GPS No.2 Azakheil | 20815 | GPS No.1 Azakhel | Rationalization/ need basis |
| 6. | Mr. Sabir Hussain SPST | 20883 | GPS No.1 Faqir Hunr | 28692 | GPS No.2 Faqir Hunr | Rationalization/ need basis |
| 7. | Mr. Aftab Hussain SPST | 21031 | GPS Mera Azakhel | 32885 | GPS M_Sherkera | Rationalization/ need basis |
| 8. | Mr. Asfandyar Khan SPST | 30433 | GPS Shahjee Abad | 20815 | GPS No.1 Azakhel | Rationalization/ need basis |
| 9. | Mr. Azam Khan SPST | 30423 | GPS Garhi Arsala Khan | 20896 | GPS Garhi Banat | Rationalization/ need basis |
| 10. | Mr. Muzammil Shah PST | 30331 | GPS Garhi Wah Khan | 32132 | GPS Matta Bachy | Rationalization/ need basis |
| 11. | Mr. Siraj Khan PST | 20932 | GPS Gul Ahmad Kili | 20920 | GPS Garhi Fazal Rahim | Rationalization/ need basis |
| 12. | Mr. Qaiser Khan SPST | 30402 | GPS No.1 Khulizai Adezai | 20802 | GPS No.2 Adezai | Rationalization/ need basis |

Note: -

- i. TA/DA not allowed.
- ii. Charge reports should be submitted to all concerned.
- iii. Necessary entries should be made in their respective record.

(11)

ATTESTED

District Education Officer
Male Peshawar

Endst: No: 4388-4434/Dated 15/ 01/ 2020-04-20

Copy forwarded to the:-

1. SDO (Male) Town-IV Peshawar.
2. ASDEOs (Male) Circles Badaber, Mattani & Urmar Peshawar.

Better copy

محرمت جا۔ D.E.O صاحب (پبلک) ضلع پشاور

11

جانب عالی

عنوان: منسوخی ریپنٹلائزیشن آرڈر ٹاؤن فورڈ ایبل D.E.O پشاور

گزارش کی جاتی ہے کہ بندہ گورنمنٹ پرائمری سکول شاہ جی آباد آفاقیل سرکل قنٹی ٹاؤن فورڈ پشاور میں ٹیچریت SPST بوسٹ پر کام کر رہا ہے۔ IMU اور ASDEO صاحب کی غلط پورٹمنٹ کی بناء پر بندہ کی تبدیلی ریپنٹلائزیشن آرڈر کے تحت کو الٹمبر آرڈر 4388-4434 15/1/2020 کو گورنمنٹ پرائمری سکول آفاقیل جزا کو بھیجی ہے۔

گورنمنٹ پرائمری سکول شاہ جی آباد کی طلبہ کی لوٹل تعداد 133 ہیں۔
کلاسز و انٹر تعداد ذیل ہیں۔

- ① نرسری = 27
- ② ادنیٰ = 36
- ③ اعلیٰ = 14
- ④ دوم = 25
- ⑤ سوم = 15
- ⑥ چھارم = 06
- ⑦ پنجم = 10
- کل تعداد = 133

ATTESTED

سکول ہذا میں اساتذہ کی تعداد ③ ہیں۔ ریپنٹلائزیشن پالیسی کے مطابق ہمارے سکول میں ایک استاد کی کمی ہے۔

IMU اور ASDEO کی غلط پورٹمنٹ کی وجہ سے میری تبدیلی ہوئی ہے۔

میرا بانی کر کے میری ایبل پر ہمدردانہ غور کر کے میری تبدیلی کو منسوخ کر کے جو اپنے سکول G.P.S شاہ جی آباد آفاقیل میں تدریس کام جاری کرنے کے احکامات صادر فرمائیں۔

عین نوازش ہوگی۔
کاپی برائے ضروری اطلاع

HEAD TEACHER
G.P.S Shahjee Abad
Aza Fhol (Mattani)
Code: 43833
Asjad

اسفند پارخان SPST گورنمنٹ پرائمری سکول شاہ جی آباد ② ASDEO سرکل قنٹی ٹاؤن فورڈ
① SDEO سردانہ ٹاؤن فورڈ

نوٹ: درخواست کیسے ہی سٹاپ ریٹینٹ او (EMIS) پر فوری منسلک ہیں۔



Education Management Information System (EMIS)
Elementary & Secondary Education Department
Government of Khyber Pakhtunkhwa

☎ 091-9223079



Annual School Census Questionnaire (2019-20)

15

1. School EMIS Code 30433

2. School Name G.P.S SHAH JEE ABAD AZAKHEI
(CAPITAL LETTERS)

3. Gender

| | |
|-------------------------------------|--------------------------|
| Male | Female |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> |

4. School Level

| | | | | |
|--------------------------|-------------------------------------|--------------------------|--------------------------|--------------------------|
| Mosque | Primary | Middle | High | H/Sec |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

5. School Coordinates

| | |
|---|---|
| X | Y |
| | |

6 a. DDO Code 65K8

b. School Official Email Address: _____

7. District Peshawar 8. Tehsil / Town Peshawar Town IV

9. UC Name Azakhe No 62

10. Village/Neighborhood Council Name Mario Khe 198

11. Village/City Name Azakhe

12. Locality/Mohalla Name Shah Jee Abad

13. Street Name/No. _____ 14. School Landline No. Shah Jee Abad

15. Location: Urban Rural

16 The school is running in: Summer Zone Winter Zone
(The option may be selected on the basis of whether the longer vacations of the school is allowed in the summer or winter)

17. National Constituency (NA) No. 29 18. Provincial Constituency (PK) No. 71

19. Circle Office Name Mattani 20. SDEO Office Name Town IV

21. Ownership of the building Government Donated Rented Adjusted
 Sheltered Shelterless

1. Government means land & building is the sole property of the government.
2. Donated means the land/building is donated but ownership not mutated/transferred to the government.
3. Rented means that land and building is not the sole property of the government.
4. Adjusted (running in another school)
5. Sheltered (fabricated ceilings/tents)
6. Shelterless means that no building exists.

22 Type of Upgradation Developmental Non-Developmental

23. a. Year of Establishment 1993

b. Year of Construction / Re-Construction 2010

c. Year of Upgradation

| | | | |
|--------------------------|--------------------------|--------------------------|--------------------------|
| Primary | Middle | High | H.Sec |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

24. Total Land allocated/donated for school 40 masals (in Marlas as per record)

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Annual Indicators:

26. a. Other Facilities (1-Yes, 2-No)
- i. Hostel 2
 - ii. If Hostel exists, then write total boarders capacity?
 - iii. Total no. of rooms in Hostel: _____
- b. Whether the following exist (by nature of construction)? (1. Yes, 2. No)
- Principal office 2
 - ii. Clerk office
 - iii. Store 2
 - iv. Home Economics lab 2
- c. Does the school have ramp access for the following: - (1-Yes, 2-No)
- i. School Entrance 2
 - ii. School Building 1
 - iii. Toilets 4
- d. DRM Facility (1-Yes, 2-No)
- i. First Aid Kit (1. Yes, 2. No) 2
 - ii. SOS No: _____
 - iii. No. of Teachers Trained: 03

Enrolment

(Total enrolment of section wise, age wise must be same)

27 Enrolment by Age Group (on the basis of admission register)

| Age | Boys | | | | | | | | | | | | | | Total |
|-----------------------|-----------------------|------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|------------------|------------------|------------------|-------|
| | Nursery / Un-Admitted | Prep | 1 st | 2 nd | 3 rd | 4 th | 5 th | 6 th | 7 th | 8 th | 9 th | 10 th | 11 th | 12 th | |
| 3+ | 10 | | | | | | | | | | | | | | |
| 4+ | 07 | 09 | | | | | | | | | | | | | |
| 5+ | | 15 | 04 | | | | | | | | | | | | |
| 6+ | | | 10 | 10 | | | | | | | | | | | |
| 7+ | | | | 10 | 05 | | | | | | | | | | |
| 8+ | | | | | 10 | 02 | | | | | | | | | |
| 9+ | | | | | | 03 | 03 | | | | | | | | |
| 10+ | | | | | | | 06 | | | | | | | | |
| 11+ | | | | | | | | | | | | | | | |
| 12+ | | | | | | | | | | | | | | | |
| 13+ | | | | | | | | | | | | | | | |
| 14+ | | | | | | | | | | | | | | | |
| 15+ | | | | | | | | | | | | | | | |
| 16+ | | | | | | | | | | | | | | | |
| 17+ | | | | | | | | | | | | | | | |
| 18+ | | | | | | | | | | | | | | | |
| 19+ | | | | | | | | | | | | | | | |
| 20+ | | | | | | | | | | | | | | | |
| >=21 | | | | | | | | | | | | | | | |
| Total | 22 | 30 | 14 | 22 | 15 | 05 | 09 | | | | | | | | 117 |
| Repeaters | - | - | - | - | - | - | - | | | | | | | | |
| No. of Non-Muslims | - | - | - | - | - | - | - | | | | | | | | |
| No. of Non-Pakistanis | - | - | - | - | - | - | - | | | | | | | | |

ATTESTED

17

| Age | Girls | | | | | | | | | | | | Total | | |
|-----------------------|-----------------------|------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|------------------|-------|------------------|------------------|
| | Nursery / Un-Admitted | Prep | 1 st | 2 nd | 3 rd | 4 th | 5 th | 6 th | 7 th | 8 th | 9 th | 10 th | | 11 th | 12 th |
| 3+ | | | | | | | | | | | | | | | |
| 4+ | 05 | | | | | | | | | | | | | | |
| 5+ | | 01 | | | | | | | | | | | | | |
| 6+ | | 05 | | 02 | | | | | | | | | | | |
| 7+ | | | | | | | | | | | | | | | |
| 8+ | | | | | | | | | | | | | | | |
| 9+ | | | | | | | | | | | | | | | |
| 10+ | | | | | | | | | | | | | | | |
| 11+ | | | | | | | | | | | | | | | |
| 12+ | | | | | | | | | | | | | | | |
| 13+ | | | | | | | | | | | | | | | |
| 14+ | | | | | | | | | | | | | | | |
| 15+ | | | | | | | | | | | | | | | |
| 16+ | | | | | | | | | | | | | | | |
| 17+ | | | | | | | | | | | | | | | |
| 18+ | | | | | | | | | | | | | | | |
| 19+ | | | | | | | | | | | | | | | |
| 20+ | | | | | | | | | | | | | | | |
| >=21 | | | | | | | | | | | | | | | |
| Total | 05 | 06 | - | 02 | | | | | | | | | | | (13) |
| Repeaters | | | | | | | | | | | | | | | |
| No. of Non-Muslims | | | | | | | | | | | | | | | |
| No. of Non-Pakistanis | 02 | 01 | - | 02 | - | - | | | | | | | | | 05 |

| | |
|------|---|
| S.No | 0 |
| | 1 |
| | 2 |
| | 3 |
| | 4 |
| | 5 |
| | 6 |
| S.No | 1 |
| | 2 |
| | 3 |
| | 4 |
| | 5 |
| | 6 |

(Note: For example, age 10+ means "equal to or greater than 10 but less than 11 years", similarly for 11+, 12+..... and so on.)

28. Enrolment by Group & Section

| Group | Classes | Total Enrolment | No. of Sections |
|------------------|------------------|-----------------|-----------------|
| Science | 6 th | | |
| | 7 th | | |
| | 8 th | | |
| | 9 th | | |
| Arts | 10 th | | |
| | 9 th | | |
| Computer Science | 10 th | | |
| | 9 th | | |

29. Subject-wise Total Enrolment in Class 11th and 12th (in Higher Secondary Schools)

| S.No. | Subject | Class | |
|-------|---------|------------------|------------------|
| | | 11 th | 12 th |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

ATTESTED



**Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar**

PH No. 091-9201389, 9210938,
9210437, 9210957, 9210468
Fax 091-9210936 0800-33857
No. 2412-25/A // Promotion / Estab
Dated Peshawar the 23/01/2013.

(18)

To
All the District Education Officers,
(Male & Female), in Khyber Pakhtunkhwa.

Subject:- Guidelines for Posting of PST B-12 on Promotion to the post of Senior PST B-14 and PSHT B-15, Qari B-12 to B-15, CT B-15 to Senior CT B-16, AT B-15 to Senior AT B-16, TT-15 to Senior TT B-16, DM B-15 to Senior DM B-16 and PET B-15 to Senior PET B-16.

Memo:

I am directed to refer to the subject noted above and to clarify that posts of PST B-12 /Senior PST B-14/PSHT B-15 may be rationalized and re-distributed among the Primary schools in the following manner and on Promotion of PST B-12 to the post of Senior PST B-14 and PSHT B-15, may be posted as under:-

| Up gradation of Posts in Primary Schools (Female) After Rationalization @ 1-40 ratio | | | | | | | | | | | | |
|--|-------------|------------------------|-----------------|--|---------|-----------|-----------|----------|----|--------|------|--|
| S.No | School Code | Name of Primary School | Total Enrolment | Sanctioned Posts after Rationalization | | | | | | | | |
| | | | | SST B-16 | CT B-15 | PSHT B-15 | SPST B-14 | PST B-12 | NQ | Caller | Chow | |
| 1 | 25288 | GGPMS A (JICA) | 208 | 1 | 2 | 0 | 2 | 3 | 1 | 1 | 1 | |
| 2 | 25048 | GGPMS B (JICA) | 306 | 1 | 2 | 0 | 2 | 6 | 1 | 1 | 1 | |
| 3 | 25143 | GGCMS C | 173 | 1 | 0 | 0 | 2 | 3 | 1 | 1 | 1 | |
| 4 | 30056 | GGPS D | 150 | 0 | 0 | 1 | 0 | 1 | 0 | 0 | 1 | |
| 5 | 25224 | GGPS E | 110 | 0 | 0 | 1 | 1 | 1 | 0 | 0 | 1 | |
| 6 | 25244 | GGPS F | 160 | 0 | 0 | 1 | 1 | 2 | 0 | 0 | 1 | |
| 7 | 25277 | GGPS G | 198 | 0 | 0 | 1 | 1 | 3 | 0 | 0 | 1 | |
| 8 | 25221 | GGPS H | 240 | 0 | 0 | 1 | 2 | 3 | 0 | 0 | 1 | |
| 9 | 32912 | GGPS I | 285 | 0 | 0 | 1 | 2 | 4 | 0 | 0 | 1 | |
| 10 | 25097 | GGPS J | 320 | 0 | 0 | 1 | 2 | 5 | 0 | 0 | 1 | |
| 11 | 25138 | GGPS K | 360 | 0 | 0 | 1 | 2 | 6 | 0 | 0 | 1 | |
| 12 | 32606 | GGPS L | 400 | 0 | 0 | 1 | 3 | 6 | 0 | 0 | 1 | |
| 13 | 25278 | GGPS M | 440 | 0 | 0 | 1 | 3 | 7 | 0 | 0 | 1 | |
| Total | | | 3250 | 3 | 4 | 10 | 23 | 50 | 3 | 3 | 13 | |

| Up gradation of Posts in Primary Schools (Male) After Rationalization @ 1-40 ratio | | | | | | | |
|--|-------------|------------------------|-----------------|--|-----------|----------|------|
| S.No | School Code | Name of Primary School | Total Enrolment | Sanctioned Posts after Rationalization | | | |
| | | | | PSHT B-15 | SPST B-14 | PST B-12 | Chow |
| 1 | 30056 | GPS A | 150 | 1 | 0 | 1 | 1 |
| 2 | 25224 | GPS B | 110 | 1 | 1 | 1 | 1 |
| 3 | 25244 | GPS C | 160 | 1 | 1 | 2 | 1 |
| 4 | 25277 | GPS D | 198 | 1 | 1 | 3 | 1 |

ATTESTED

| | | | | | | | |
|-------|-------|-------|------|----|----|----|----|
| 5 | 25221 | GPS E | 240 | 1 | 2 | 3 | 1 |
| 6 | 32912 | GPS F | 285 | 1 | 2 | 4 | 1 |
| 7 | 25097 | GPS G | 320 | 1 | 2 | 5 | 1 |
| 8 | 25138 | GPS H | 360 | 1 | 2 | 6 | 1 |
| 9 | 32606 | GPS I | 400 | 1 | 3 | 6 | 1 |
| 10 | 25278 | GPS J | 440 | 1 | 3 | 7 | 1 |
| Total | | | 2563 | 10 | 17 | 38 | 10 |

Note:-

1. Each Primary School (except JICA & Community Model School where SST post is sanctioned) will have one post of PSHT B-15.
2. There will be no post of PSHT B-15 & SPST B-14 in MPS.
3. No of posts of PSHT B-15, SPST B-14 & PST B-12 will not exceed the already communicated sanctioned posts.

Posting on Promotion

4. On Promotion of PST B-12 to the post of Senior PST B-14 and PSHT B-15, may be posted in the same UCs Subject to the provisions of sanctioned post.
5. Senior most PSHT B-15, SPST B-14 & PST B-12 (According to the Seniority list) may be retained in the school of their present posting and junior most may be transferred to other schools.
6. In their promotion order it should be mentioned that their Inter-se-Seniority on lower post will remain intact.
7. If anyone forego promotion, Entry to this effect may be made if his/her Service book.
8. Minimum qualifications for the above posts have already been prescribed in the Service Rules notified vide Government of Khyber Pakhtunkhwa Elementary and Secondary Education Department Notification No. SO (PE) 4-5/SSRC/Meeting/2012/Teaching Cadre Dated the November 13, 2012.

I am further directed to further clarify that:

1. On promotion Qari B-12 to the post of Senior Qari B-15, CT B-15 to Senior CT B-16, AT B-15 to Senior AT B-16, TT-15 to Senior TT B-16, DM B-15 to Senior DM B-16 and PET B-15 to Senior PET B-16, will be posted in High and Higher Secondary Schools
2. 1/3 Qari B-12 posts will be upgraded to Senior Qari B-15, CT B-15 to Senior CT B-16, AT B-15 to Senior AT B-16, TT-15 to Senior TT B-16, DM B-15 to Senior DM B-16 and PET B-15 to Senior PET B-16 in , High and Higher Secondary Schools only in Elementary and Secondary Education Department at District Level .
3. No post of CT B-15, PET B-15 , AT B-15 , DM B-15 , TT-15 , will be upgraded to B-16 in Middle Schools.
4. Senior most Senior CT B-16, Senior AT B-16, Senior DM B-16, Senior PET B-16, Senior TT B-16 (According to the Seniority list) may be retained in the schools of their present posting and junior most may be transferred to other schools.
- 5.

[Signature]
Dy: Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

Endst: No. / File No.1/A-88/KC/S.list : Dated Peshawar the 18/01/2013.

Copy forwarded for information and necessary action to the: -

1. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
2. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
3. M/File

[Signature]
Dy: Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

BEFORE THE

SERVICE APPEAL NO.3184/2020

Yar Khan

V/S

Secretary E & SE and others

IN BEHALF OF RESPONDENTS.

Respectfully Sheweth:

The Respondents submits bellow:

PRELIMINARY OBJECTIONS:

1. That the Appellant has got no cause of action /locus standi.
2. That the Appellant has concealed material facts from this Hon,ble Tribunal.
3. That the Appellant has been estopped by her own conduct to file the instant appeal before this Hon'ble Tribunal.
4. That the instant Appeal is bad for mis-joinder and non-joinder for the necessary parties.
5. That the Appellant has not come with clean hands to this Hon'ble Tribunal.
6. That the instant Appeal is barred by law.
7. That the Appellant does not fall within the ambit of aggrieved person.

ON FACTS.

1. That Para No.1 pertains to record.
2. That Para No.2 also Pertains to record.
3. That in reply to Para No.3, it is submitted that the appellant was transferred from GPS Shahjee Abad from GPS Aza Khel on the report of Independent Monitoring Unit (IMU).

Furthermore, the strength of the student in GPS Aza Khel is sufficient and it is pertinent to mention here that there were three teachers working in GPS Shahjee Abad where in the said school numbers of student were less than eighty.

Moreover, in said school the appellant, his brother and his brother in law were adjusted and usually one of them remains absent with their mutually understanding. So the department transferred the appellant to his home station and near his house.

4. That Para No.4 is misleading and against the facts. Furthermore, it is submitted that the appellant was transferred under the rationalization policy but he did not obey the order of the competent authority and hence the appellant committed misconduct therefore, the appellant has been served show cause notice, that why the appellant is not obeying the order of the competent authority. The appellant submitted the reply of the said show cause which was not satisfactory. Furthermore, the appellant has got all the salaries of the said period.

(Copy of Show Cause Notice is attached as Annex: A)

It is pertinent to mention here that the appellant filed writ petition No.2380-P/2020 which was decided by PHC on the dated.

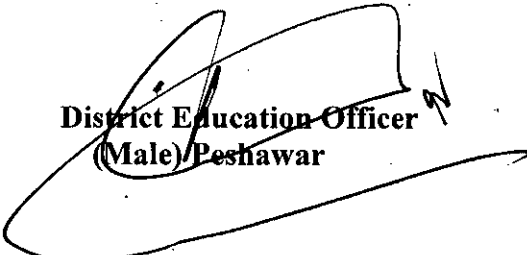
● (Copy of judgment of Peshawar High Court Peshawar is attached as Annex: B)

5. That in reply to Para No.5, it is submitted that the appellant has no cause of action to file the said service appeal in this Hon'ble Service Tribunal.

GROUND

- A. That Ground-A is incorrect, misleading and against the facts. The transfer order of the appellant is according to law and rules.
- B. That Ground-B is incorrect, misleading and against the fact. The numbers of the students are less than eighty. The detail reply has been given in Para No.3.
- C. That Ground-C is also incorrect and misleading. The appellant is transferred to his home station but it is beyond the fact, that why the appellant reluctant to join in GPS No.1 Azal Khel which is at walking distance at his home.
- D. That Ground-D is incorrect and misleading.
- E. That Ground-E is also incorrect, misleading and against the facts. The detail reply has been given in Para No.3 of the facts.
- F. That Ground-F is incorrect. Detail reply has been given in the above Para.
- G. That Ground-G is incorrect, misleading and against the facts.
- H. That the Respondents have also seeks permission of this Hon'ble Tribunal to submit further / Additional Grounds at the time argument.

It is therefore, very humbly prayed that on acceptance of this reply, the instant appeal may very kindly be dismissed with cost.


 District Education Officer
 (Male) Peshawar

Amir (A)

Handwritten initials and a circled mark.

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) PESHAWAR.

SHOW CAUSE NOTICE.

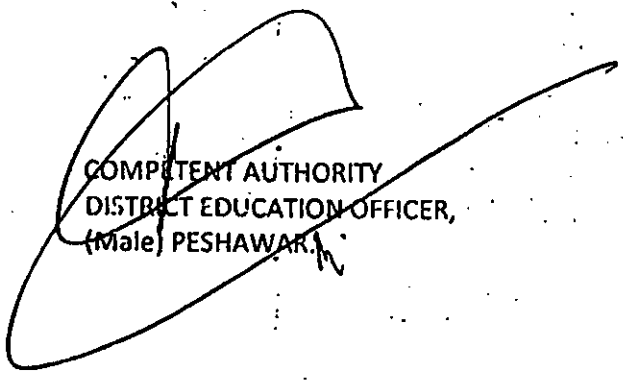
I, (Mr. Irfan Ali, DEO (M) Peshawar), as competent authority, under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011, do hereby serve you, Mr. Asfandiyar Khan SPST, GPS-Shah Jee Abad Peshawar as follow:

I am satisfied that you have committed the following acts/omissions specified in rule 3 of the said rules:
(a) Non-compliance of Rationalization order.

As a result thereof, I, as competent authority, have tentatively decided to impose upon you the major penalty under rule 4 of the said rules.

You are, therefore, required to show cause as to why the aforesaid penalty should not be imposed upon you and also intimate whether you desire to be heard in person.

If no reply to this notice is received within seven days or not more than fifteen days of its delivery, it shall be presumed that you have no defence to put in and in that case an ex-parte action shall be taken against you.


COMPETENT AUTHORITY
DISTRICT EDUCATION OFFICER,
(Male) PESHAWAR.




ATTESTED

Annex — (B)

P-4

PESHAWAR HIGH COURT, PESHAWAR.

FORM 'A'
FORM OF ORDER SHEET

| Date of order. | Order or other proceedings with the order of the Judge |
|----------------|--|
| 22.06.2020 | <p data-bbox="592 499 1182 542"><u>W.P.No.2380-P of 2020 with interim relief.</u></p> <p data-bbox="592 568 1241 639">Present: Mr.Hamad Hassan, advocate for the petitioner.</p> <p data-bbox="751 672 1362 779">Mr.Rab Nawaz Khan, AAG alongwith Mr.Daud Khan ADEO (Male) Peshawar for the respondents.</p> <p data-bbox="587 843 1362 1161"><u>LAL JAN KHATTAK, J.-</u> As by now the petitioner is getting his salary, therefore, this petition has achieved its goal and as such stands dismissed, however, if he has any grievance regarding the arrears, then he can approach his department for the redressal thereof.</p> <p data-bbox="1241 1174 1449 1352"> JUDGE</p> <p data-bbox="1241 1391 1353 1480"> JUDGE</p> |

1 Mr. Asfandyar Khan, S Pst
Govt Primary, Shrood, Shahjee
asad circles, Muttari, Peshawar
has Received Rs amount
1000/- from source (PPA)

No. 3184/2020 on 29/7/2020

Asfandyar
Asfandyar Khan

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

SERVICE APPEAL NO./2020

Mr. Asfandyar Khan S.PST Govt Primary School Shahjee Abad Azakhel
Circle Mattani, Peshawar**Petitioner**

VERSUS

Secretary to Govt of Khyber Pukhtunkhwa Elementary & Secondary
Education Department, Peshawar and others**Respondents**

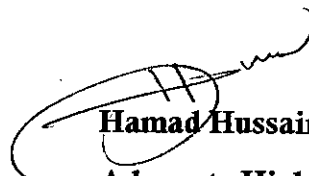
INDEX

| S.N | Descriptions of Documents | Annexure | Page |
|-----|---|----------|------|
| 1 | Memo of Rejoinder | | 13 |
| 2 | Affidavit | | 3 |
| 3 | Copies of students and staff list, transfer order date 18/07/2020 and school wise detail vacant posts | A-B & C | 4-9 |

Dated: 13/01/2021


Appellant

Through


Hamad Hussain
Advocate High court
Peshawar
Mobile: 03120952763

(1)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

SERVICE APPEAL NO.3184 /2020

Mr. Asfandyar Khan

VERSUS

Secretary E&SE and others

**REJOINDER ON BEHALF OF THE APPELLANT AGAINST THE WRITTEN
REPLY SUBMITTED BY THE OFFICIAL RESPONDENTS**

RESPECTFULLY SHEWETH,

PRELIMINARY OBJECTIONS

(1 to 7) All objection raised by respondents are incorrect and baseless. Rather the respondents are estopped to raise any objection due to their own conduct.

FACTS

1. No comments endorsed by the respondents department which means respondent admitted Para No 1 of the written reply as correct.
2. No comments endorsed by the respondents department which means respondent admitted Para No 1 of the written reply as correct.
3. Para No 3 of the written reply is incorrect and baseless, moreover wherein the appellant performing his deputy in the Govt Primary School shahjee Abad Circle Mattni as there are 157 students enrolled as per concern school staff statement while under rationalization policy 40 students one (1) teacher. Further it is added that office order Endst No 10052-10153 dated 18/07/2020 the respondents department has been transfer one Muhammad Rasool (SPST) serial No 56 to GPS shah Jee Abad from GPS Azakhel No 1.

Moreover in the said school Govt Primary school shah jee Abad as per rationalization policy @ 40 students one teacher as there is one more teacher is required and one teacher post is vacant in the said school. Further in shool wise detail of vacant at serial No 20 shows one post of PST is vacant in GPS Shajee Abad as per list of the District Education officer (Male) Peshawar. **(Copies of students and staff list, transfer order date 18/07/2020 and school wise detail vacant posts as Annexure-A-B and C).**

4. Para No 4 of the reply is incorrect. The appellant has always been obey the order of the competent authority but the appellant has based on personal ill and will & malafide intention as respondent No 3 the then District Education Officer (Male) Peshawar name Irfan Ali who have been stopped the salaries of the appellant and gave a fake Show Cause Notice without any office Number and date wherein the appellant has been filed writ petition NO 2380-p/2020 before the Peshawar high court for releasing his salaries when the writ petition has been notice for comments to the respondents but the respondents couldn't submitted their comments and later on release the salary of the appellant.
5. Para No 5 the appellant has been filed a department appeal to the competent authority after passing stipulated period (90) days. Hence the appellant filed the present appeal before this Hon'able service Tribunal as per section 4.

Grounds

- A. Para A of the Ground the transfer order of the appellant is against the rationalization police as per 40 students one teacher which is liable to be set aside according to the rules and policy.
- B. Para B of the Ground there were round about 157 students are Govt Primary School Shah jee Abad but the respondents department concealing the real facts from this Hon'able Service Tribunal
- C. Para C of the Ground whereas the appellant was transferred there is life threatened to the appellant located nearby GPS Azakhel No 1 due to enmity, where the appellant has transferred. That in this connection F I R has also been lodged in P S Mattani against Son of the appellant Nemely Shehyar.
- D. Para D of the Ground as explained as above para.
- E. Para E of the Ground the transferred order of the appellant is based on personal ill and will & malafide intention as Respondent No. 3 the then District Education Officer namely Irfan Ali have ulterior motives during past Posting Transfer as SDEO Peshawar with the elder brother of the appellant namely Sarfaraz Khan Ex SDEO Peshawar, wherein this Honourable Tribunal has delivered judgment in favour of the elder brother of the appellant, Sarfaraz Khan Ex SDEO Peshawar and he was remained SDEO Peshawar.

F. Para F of the Ground as explained as above para.


G. Para G of the ground as also as explained as above paras .

H. That any other grounds will be taken at the time of arguments with the permission of this service Tribunal.

It is therefore humbly prayed that on acceptance of this Rejoinder on behalf of the appellant and the transferred order of the appellant may kindly be set aside


Appellant

Through


(HAMAD HUSSAIN)
Advocate High Court
Peshawar
Mobile 0312-0952763

Affidavit:-

I, Asfandyar S. PTS / HM GPS Shahjee Abad Azakhel Mattani Peshawar do hereby solemnly affirm that the contents of this rejoinder in the instant Service Appeal are true correct with the best of my knowledge that no such like appeal has earlier been filed between the parties in this Honourable Tribunal


DEPONENT

5
A
Amrod

SUBDIVISIONAL EDUCATION OFFICER (MALE) TOWN-1 PESHAWAR

30433

بابت ماہ 1992 نام سکول شہداء تاریخ اجراء سکول 1992 سال تعمیر عمارت 1993 ازبوں کونسل شہداء سرکار (پٹی) تعداد کمرہ جات 4 پٹی بلک تعداد لائبریری 02 چار دیواری بلک بجلی میٹر بلک سٹیل عمارت نہیں کرسی 08 چٹائی / کارپٹ 23

| Sl. No. | Name | Qualification | Age | Experience | Remarks |
|---------|---------|---------------|------------|-------------|---------|
| 1 | M. Raza | B.A | 3-8-1975 | 17301-11484 | پشاور |
| 2 | M. Saif | M.Ed | 20-04-1980 | 17301-88404 | پشاور |
| 3 | M. Saif | B.Ed | 15-8-82 | 17301-11495 | پشاور |
| 4 | M. Saif | B.Ed | 3-3-1982 | 17301-44624 | پشاور |
| 5 | | | | | |
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نام چیلر مین و رابطہ نمبر اکرام اللہ خان تاریخ تشکیل 28-11-018 اکانٹنٹ نمبر 2428-4 بیفک نام MCB کل رقم برائے سٹل روای 114000/- کل میزان 50000/- تکمیل شدہ کام کی مختصر تفصیل

میں بحالیّت بیلڈ لیجر / انچارج سکول بڈا تصدیق کرتا ہوں کہ گوشوارہ بڈا میں تمام معلومات درست درج ہیں میرے ساتھ درج بالا کل ملازمین سکول بڈا میں باقاعدگی سے ڈیوٹی سرانجام دے رہے ہیں اور ان میں سے کوئی بھی دوران سکول اوقات کسی دوسری جگہ ملازمت نہیں کر رہا اور نہ ہی ان میں سے کوئی بیرون ملک مقیم ہے۔ نیز کسی بھی شرط انچارج کا میں نے انہیں دیا ہے۔

| جماعت | ان داخل | اول لٹری | اول اعظم | دوم | سوم | چہارم | پنجم | کل میزان |
|----------|---------|----------|----------|-----|-----|-------|------|----------|
| لڑکیاں | 20 | 27 | 43 | 19 | 21 | 10 | 06 | 146 |
| لڑکے | 04 | 02 | 03 | - | 02 | - | - | 11 |
| کل تعداد | 24 | 29 | 46 | 19 | 23 | 10 | 06 | 157 |

تاریخ پڑتال داخل خارج (اٹری) نام پڑتال کنندہ عہدہ

مادہ روای سکول وزٹا کرنے والے افسران کے نام و عہدہ و تاریخ مولیٰ بیگم

تاریخ 8-10-2020 دستخط بیلڈ لیجر و ممبر M. Saif

MUHAMMAD ISHTIAQ ASDEO CIRCLE MATTANI PESHAWAR

CHARGE REPORT AND SB

According to the Endst No, 10052-1015:
S No, 56 Dated 18-7-2020 Commenced To
DEO (M) Peshawer. Muhammad Rasool
Spst GPS Azakhel No1 Civil Mattani
has been transferred as PSHT BPS-1
to GPS Shahjee abad. He took order
The change of his post on
18-07-2020 after noon.
change report have been sent
The concerned office.

Muhammad
Rasool
(Signature)

HEAD TEACHER
GPS Shahjee Abad
Azakhel (Mattani)
Code # 30430
18/7/2020

i/c Head mas.

(Signature)
HEAD TEACHER
GPS Shahjee Abad
Azakhel (Mattani)
Code # 30430

18/7/2020

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) PESHAWAR

6

OFFICE ORDER

In compliance upon the recommendation of the Departmental Promotion Committee held on 14/7/2020, the competent authority is pleased to promote and adjust the following SPSTs to PSHT post in the schools noted against their names in the light of the Directorate Elementary & Secondary Education Department Notification No. 0104-09 dated 12/05/2019 with immediate effect in the interest of Public service.

| Sr No | Circle | Teacher Name | Father Name | Present School | Adjusted at | Remarks |
|-------|--------|----------------|----------------|----------------|----------------|---------|
| 1 | City | MUSAFIHAH KHAN | MUSAFIHAH KHAN | GPS NETHADAD | GPS MAFAN NO 3 | AVP |
| 2 | City | ABDUL KHAN | MUHAMMAD KHAN | GPS NETHADAD | GPS JAMI GARNI | AVP |
| 3 | City | ABDUL KHAN | MUHAMMAD KHAN | GPS NETHADAD | GPS NETHADAD | AVP |
| 4 | City | ABDUL KHAN | MUHAMMAD KHAN | GPS NETHADAD | GPS NETHADAD | AVP |
| 5 | City | ABDUL KHAN | MUHAMMAD KHAN | GPS NETHADAD | GPS NETHADAD | AVP |
| 6 | City | ABDUL KHAN | MUHAMMAD KHAN | GPS NETHADAD | GPS NETHADAD | AVP |
| 7 | City | ABDUL KHAN | MUHAMMAD KHAN | GPS NETHADAD | GPS NETHADAD | AVP |
| 8 | City | ABDUL KHAN | MUHAMMAD KHAN | GPS NETHADAD | GPS NETHADAD | AVP |
| 9 | City | ABDUL KHAN | MUHAMMAD KHAN | GPS NETHADAD | GPS NETHADAD | AVP |
| 10 | City | ABDUL KHAN | MUHAMMAD KHAN | GPS NETHADAD | GPS NETHADAD | AVP |
| 11 | City | ABDUL KHAN | MUHAMMAD KHAN | GPS NETHADAD | GPS NETHADAD | AVP |
| 12 | City | ABDUL KHAN | MUHAMMAD KHAN | GPS NETHADAD | GPS NETHADAD | AVP |
| 13 | City | ABDUL KHAN | MUHAMMAD KHAN | GPS NETHADAD | GPS NETHADAD | AVP |
| 14 | City | ABDUL KHAN | MUHAMMAD KHAN | GPS NETHADAD | GPS NETHADAD | AVP |
| 15 | City | ABDUL KHAN | MUHAMMAD KHAN | GPS NETHADAD | GPS NETHADAD | AVP |
| 16 | City | ABDUL KHAN | MUHAMMAD KHAN | GPS NETHADAD | GPS NETHADAD | AVP |
| 17 | City | ABDUL KHAN | MUHAMMAD KHAN | GPS NETHADAD | GPS NETHADAD | AVP |
| 18 | City | ABDUL KHAN | MUHAMMAD KHAN | GPS NETHADAD | GPS NETHADAD | AVP |
| 19 | City | ABDUL KHAN | MUHAMMAD KHAN | GPS NETHADAD | GPS NETHADAD | AVP |
| 20 | City | ABDUL KHAN | MUHAMMAD KHAN | GPS NETHADAD | GPS NETHADAD | AVP |
| 21 | City | ABDUL KHAN | MUHAMMAD KHAN | GPS NETHADAD | GPS NETHADAD | AVP |
| 22 | City | ABDUL KHAN | MUHAMMAD KHAN | GPS NETHADAD | GPS NETHADAD | AVP |
| 23 | City | ABDUL KHAN | MUHAMMAD KHAN | GPS NETHADAD | GPS NETHADAD | AVP |
| 24 | City | ABDUL KHAN | MUHAMMAD KHAN | GPS NETHADAD | GPS NETHADAD | AVP |
| 25 | City | ABDUL KHAN | MUHAMMAD KHAN | GPS NETHADAD | GPS NETHADAD | AVP |
| 26 | City | ABDUL KHAN | MUHAMMAD KHAN | GPS NETHADAD | GPS NETHADAD | AVP |
| 27 | City | ABDUL KHAN | MUHAMMAD KHAN | GPS NETHADAD | GPS NETHADAD | AVP |
| 28 | City | ABDUL KHAN | MUHAMMAD KHAN | GPS NETHADAD | GPS NETHADAD | AVP |

P-T-O → NO. 56

| | | | | | | |
|----|------------|----------------------|------------------|-------------------------|--|-----|
| | City | MUHAMMAD HAROON | DOST MUHAMMAD | GPS AKHOON ABAD | GPS NO 2 GARHI FAIZ | |
| 33 | City | AFZAL HUSSAIN | JAFFAR HUSSAIN | GPS ANDER SHER | GPS ANDER SHAIER | AVP |
| 34 | Urmar | Muhammad Rafiq | Muhammad Sharif | GPS Shahid Abad | GPS GARHI ARSALA KHAN | |
| 35 | Cantt | Nawaz Khan | Khan Muhammad | GPS Nouthia Jadeed | GPS MUHAMMAD ALI KALY | AVP |
| 36 | urmar | DILSHAD KHAN | SHAMS UL QAMAR | GPS SURIZAI DALA | GPS NO.2 TELABAND INZAR | AVP |
| 37 | C/Pura | Muhammad Jehangir | Dost Muhammad | GPS Choha Gujar | GPS TELA BAND NO.1 | AVP |
| 38 | Cantt | All Halder Khan | Abdur Rahim Khan | GPS Gharl Durrani | GPS MUSHTERZAI NO.1 | AVP |
| 39 | B/Ber | ABDUR REHMAN | USMAN KHAN | GPS Sh. Muhammad No.1 | GPS ALIZAI | |
| 40 | Takht Abad | Muhammad Ayaz | Sher Ahmad | GPS Khapa | GPS Sher Abad | AVP |
| 41 | City | MUHAMMAD JAM | SHAH NAZIR | GPS BAHND GORRI | | |
| 42 | C/Pura | Maroof Shah | Abdul Samar | GPS Pakha Ghulam 1 | GPS SHER ABAD VILLY | |
| 43 | Mattani | Mohd Umer | Haji Rat Shah | GPS Sheth Nala | GPS SHEENDRUNG | AVP |
| 44 | H-Abad | Farhad Iqbal | Arangzaib Khan | GPS Agricultural colony | GPS NO.2 | |
| 45 | C/Pura | Hidayat Ullah | Abdul Wahab | GPS Jala Bela | GPS HARYANA PAVAN | AVP |
| 46 | City | S. ZULFIQAR ALI SHAH | S. KAMAL SHAH | GPS RASHID GARHI | GPS TALA GARHI | AVP |
| 47 | Urmar | ABDUL BASEER | AZIZ UR RAHMAN | GPS New Qalla | GPS LANDA SAIFUR RAHMAN | AVP |
| 48 | City | NASIR IQBAL | NASEER KHAN | GPS ZARGAR ABAD | GPS Garhi Eshera Muhammad Mera Burizal Payan | AVP |
| 49 | Mattani | Badam Shah | Mohib Shah | GPS No.1 Faqir Banr | GPS NOOR AZIZ KORODNA | |
| 50 | B/Ber | ESSA KHAN | LATIF KHAN | GPS KAGA WALA ALIZAI | GPS PAISANI | AVP |
| 51 | City | KARAMAT SHAH | S. FAQIR SHAH | GPS BERI BAGH | GPS NO.3 MARYA JEE | |
| 52 | Cantt | Nadeem Ahmad | Abdul Jalil | GPS Garhi Durrani | GPS AHMAD KHEL NO.2 | AVP |
| 53 | H-Abad | Samin Jan | Muhammad Aslam | GPS Tenkal Payan No. 1. | GPS TALA GARH | AVP |
| 54 | D/Zal | Atta-ur-Rahman | Faiz-ur-Rahman | GPS Garhi Karim Dad | GPS TELABAND INZAR NO.1 | AVP |
| 55 | C/Pura | FAZAL QADIR | GUL KHAN | GPS Duran Pur | GPS SUMA BADABER | AVP |
| 56 | Mattani | Mohd Rasool | Wadan Shah | GPS No.1 Aza Khel | GPS SHAH JEE ABAD | AVP |
| 57 | C/Pura | Fazle Bari | Habib ur Rehman | GPS Yaseen Khan Town | GPS GARHI WAKETIAN | AVP |
| 58 | C/Pura | Inamullah | Farid Khan | GPS Chamkani No.2 | GPS TALABAND | |
| 59 | City | FAWAD AZIZ | ABDUL AZIZ | GPS KAKSHAL NO.2 | GPS SAJI ABAD | AVP |
| 60 | City | SHABIR AHMAD | QASIRO KHAN | GPS KAKSHAL NO.1 | GPS KAKSHAL | |
| 61 | D/Zal | Khalid Mahmood | Wahid Ali | GPS Kareri | GPS Nizini | AVP |
| 62 | Mathra | Sajjad Ahmad | Fazil Qudus | GPS Miran Korona | GPS GUMI SHER SPO NO.3 | |
| 63 | City | MUHAMMAD ISMAIL | MUNAWAR KHAN | GPS G. BALOCH NO.2 | GPS JODGANI | AVP |
| 64 | Urmar | Ahmad Ali | Muhammad Ali | GPS Urmar Payan No.2 | GPS NO.3 MERA INZAR PAVAN | AVP |

8

| Sl No | Teacher Name | Father Name | Present School | Adjusted at | Remarks |
|-------|----------------------------|-----------------|------------------------------|--------------------------|---------|
| 67 | Mathra Gul Muhammad | Gul Muhammad | GPS Harri Garh | GPS Mera Shahi Bala No.2 | AVP |
| 68 | Rawabi Jun Muhammad | Husain Khan | GPS Sangro No. 2. | GPS SAIGO No.1 | AVP |
| 69 | Canth Zulfkar Ahmad | Alulul Jalil | GPS Kotla Mohsin Khan | GPS MERA MAWA KHEL | AVP |
| 70 | H Abad Hidayatullah | Shamsuddin | GPS Palosi Maghdar Zai 1 | GPS Palosi Atozal | AVP |
| 71 | D/Zai Imtiaz Khan | Muhammad Ayaz | GPS Takhi Korona | GPS Takhi kor | AVP |
| 72 | Umar Muhammad Haliq | Noor Bahadar | GPS Garhi Tarkanan | GPS GARHI TARKANAN | AVP |
| 73 | Umar Zai Mihal | Muhamamd Saeed | GPS Umar Miara No.1 | GPS MERA HASSAN KHEL | AVP |
| 74 | Umar HAJI HAWAZ | ABDUL GHAFFAR | GPS HAZAR KHAWANI No.3 | GPS Khari Kallia | AVP |
| 75 | D/Her SHAFIQ UR RAHMAN | SAID REHMAN | GPS Gharibabad M/Zai | GPS KARA KHEL | AVP |
| 76 | City MAQSUD KHAN | HAFIZ UR RAHMAN | GPS SHEIKH ABAD | GPS MERA AZA KHEL | AVP |
| 77 | Takhi Abad Muhammad Shafiq | Muhammad Ismail | GPS Larana | GPS Essa Khel Topchian | AVP |
| 78 | City MUHAMMAD HAYAT KHAN | SILIR ZAMAN | GPS AKHOON ABAD | GPS GARHI FUZULLAH NO.1 | AVP |
| 79 | Canth Sajjad Ali | M Iqbal | GPS Pushtakhara Payan No. 1. | GPS HARI KHEL LAI MA | AVP |
| 80 | Mathra Nazir Muhammad | Said Wahab | GPS Patwar Payan | GPS Dheri Kalay | AVP |
| 81 | Takhi Abad Abdur Rehman | AZIZ UR RAHMAN | GPS Bashir Abad Pesh. | GPS MANDRA KHEL | AVP |
| 82 | Canth Muhammad Riaz | Sher Muhammad | GPS Nauthia Jadeed | GPS KHUR KHURI | AVP |
| 83 | City SARDAR KHAN | ETBAH KHAN | GPS GULBAHAR 3 | GPS DINBAHAR No.1 | AVP |
| 84 | Canth Wasitullah | Musharraf Khan | GPS No.2.Houdeh Payan | GPS ADEZAI NO.1 | AVP |

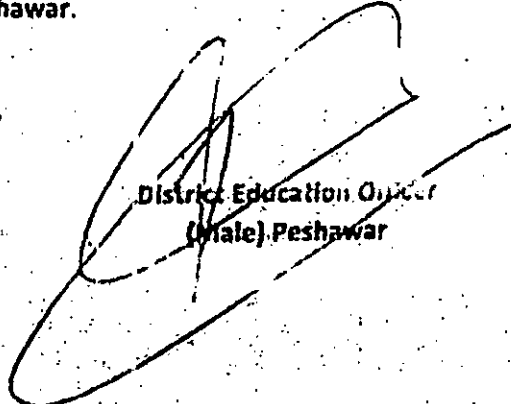
Necessary entry should be made in their service books.
 They should give an undertaking to the effect that if any overpayment is
 Charge report should be submitted to all concerned.
 No TA/DA is allowed.

(MR IRFAN ALI)
 District Education Officer
 (Male) Peshawar

Encl No: 10052-10153 Dated Peshawar the 18/07/2020

Forwarded for information to the:

- 1 Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- 2 Accountant General Khyber Pakhtunkhwa Peshawar.
- 3 Sub Divisional Education Officers (Male) Town I,II,IV Peshawar.
- 4 ASDEOs Circle Concerned.
- 5 DMO IFAU Peshawar.
- 6 Officials concerned.


 District Education Officer
 (Male) Peshawar



item



9

| OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) PESHAWAR | | | | | |
|--|-------|--|--------------------|----------|-------|
| STATEMENT SHOWING THE SCHOOL WISE DETAIL OF FOLLOWING VACANT POSTS | | | | | |
| S.No. | EMIS | Name of School | Union Council/Ward | PST B-12 | Total |
| 1 | | GPS Maira Achmi Bala 2 | Achmi Bala | 1 | 1 |
| 2 | | GPS Sango No 1 | Achmi Bala | 1 | 1 |
| 3 | 30402 | GPS No.1 Khulzai Adezai | Adezai | 1 | 1 |
| 4 | 20801 | GPS No.1 Adezai | Adezai | 3 | 3 |
| 5 | 20802 | GPS No.2 Adezai | Adezai | 3 | 3 |
| 6 | 20632 | GPS AKHOONABAD | Akhoonabad | 2 | 2 |
| 7 | 20643 | GPS Beri Bagh | Akhoonabad | 3 | 3 |
| 8 | 20677 | GPS Haider Colony | Akhoonabad | 1 | 1 |
| 9 | 20633 | GPS ANDER SHAHER | Ander Sheher | 1 | 1 |
| 10 | 20697 | GPS Khudadad | Ander Sheher | 1 | 1 |
| 11 | 20636 | GPS No 1 ASIA PARK | Asia | 1 | 1 |
| 12 | 20831 | GPS BANDA MIANGAN | Azakhel | 1 | 1 |
| 13 | 20883 | GPS FAQIR BURN NO.1 | Azakhel | 1 | 1 |
| 14 | 38692 | GPS FAQIR BURN NO.2 | Azakhel | 1 | 1 |
| 15 | 21031 | GPS Mera Azakhel | Azakhel | 1 | 1 |
| 16 | 21153 | GPS No.1 Tela Band | Azakhel | 1 | 1 |
| 17 | 21154 | GPS No.2 Telaband | Azakhel | 1 | 1 |
| 18 | 40749 | GPS NOOR AZIZ KOROONA | Azakhel | 1 | 1 |
| 19 | 40749 | GPS shahidan Taouskhel Noor Aziz koroona | Azakhel | 1 | 1 |
| 20 | 31433 | GPS SHAHJEE ABAD | Azakhel | 1 | 1 |
| 21 | 32126 | GPS Sher Mir Killi | Azakhel | 1 | 1 |
| 22 | 30328 | GPS BADA BER NO.4 | Badaber Harozai | 1 | 1 |
| 23 | 38693 | GPS DELHI DHER NO. 2 | Badaber Harozai | 1 | 1 |
| 24 | 20910 | GPS GARHI MUMTAZ | Badaber Harozai | 1 | 1 |
| 25 | 20889 | GPS GARI AHMED KHAN | Badaber Harozai | 1 | 1 |
| 26 | 20995 | GPS LALMA BADHBER | Badaber Harozai | 1 | 1 |
| 27 | 39993 | GPS MERA BADABER | Badaber Harozai | 1 | 1 |
| 28 | 20819 | GPS BADA BER NO.1 | BADHBER MARYAMZAI | 1 | 1 |
| 29 | 38694 | GPS MERA SAM BADABER | BADHBER MARYAMZAI | 1 | 1 |
| 30 | 39994 | GPS NASRULLAH KHAN KOROONA | BADHBER MARYAMZAI | 1 | 1 |
| 31 | 20819 | GPS No.1 BADA BER | BADHBER MARYAMZAI | 1 | 1 |
| 32 | 21111 | GPS SHAGA BADABER | BADHBER MARYAMZAI | 1 | 1 |
| 33 | | GPS Bazid Khel Gull Abad no 3 | Bazid Khel | 1 | 1 |
| 34 | | GPS Ghuri Shaheedan | Bazid Khel | 1 | 1 |
| 35 | | GPS Marozai No 1 | Buzidkhel | 1 | 1 |
| 36 | | GPS Aulit Colony | Bharna Muzi | 2 | 2 |
| 37 | 20844 | GPS Bela Niko Khan | Budni | 1 | 1 |
| 38 | 21191 | GPS Garhi Pordit | Budni | 1 | 1 |
| 39 | 20936 | GPS Gulozai | Budni | 3 | 3 |
| 40 | 40428 | GPS Yaseen Abad | Budni | 1 | 1 |
| 41 | | GPS Bara Lane | CBP | 2 | 2 |
| 42 | 30434 | GPS Chaghar Matti No-1 | Chaghar Matti | 1 | 1 |
| 43 | 20891 | GPS GARHI ALI MUHAMMAD | Chaghar Matti | 1 | 1 |
| 44 | 20941 | GPS HAJI ZAI | Chaghar Matti | 1 | 1 |
| 45 | 21084 | GPS PIR KALAY NO.1 | Chaghar Matti | 1 | 1 |
| 46 | 30406 | GPS TAPU KOROONA | Chaghar Matti | 1 | 1 |

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) PESHAWAR

CORRIGENDUM:

In pursuance of honorable Service Tribunal KPK direction please read the school name GPS Shahjee Abad Aza Khet Peshawar instead of GPS No.3 Mattani Peshawar vide notification issued this office Endst No. 8176-79/P.File/Asfandyar dated 23/12/2021.

District Education Officer
(Male) Peshawar

Dated 09/02/2022

Endst No: 7874-781

Copy of the above is forwarded to the:-

1. Chairman KPK Service Tribunal Peshawar.
2. Accountant General Khyber Paktunkhwa Peshawar.
3. SDEO(M) Town Concerned
4. Official Concerned.
5. Head Master Concerned.

Asif
Dy. District Education Officer
(Male) Peshawar