

04<sup>th</sup> July, 2022

Counsel for appellant present. Mr. Muhammad Adeel Butt, Additional AG for respondents present.

Respondents have not submitted written reply/comments. Learned AAG seeks time for submission of written reply/comments. Adjourned. To come up for written reply/comments on 05.09.2022 before S.B.



**(Kalim Arshad Khan)**  
**Chairman**

05.09.2022

Appellant present through counsel.

Kabir Ullah Khattak, learned Additional Advocate General alongwith Imran Assistant for respondents present.

Reply on behalf of respondents is still awaited. Representative of respondents requested for time to submit reply/comments. Last opportunity is granted. To come up for reply/comments on 08.11.2022 before S.B.



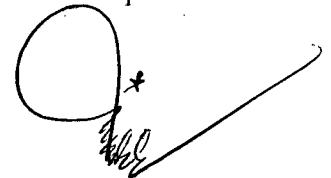
**(Rozina Rehman)**  
**Member(J)**

24.05.2022

Mr. Noor Muhammad Khattak. Advocate for the appellant present.  
Preliminary arguments heard.

Learned counsel for the appellant while opening his arguments, contended that the appellant is aggrieved of the impugned order dated 26.01.2022 when he was transferred from the office of DEO (F) Battagram to DEO (M) Battagram. His departmental appeal dated 27.01.2022 was not decided. Since the Khyber Pakhtunkhwa Service Tribunal was dis-functional during the period, the appellant instituted Writ Petition No.543-P/2022 with IR in Honourable Peshawar High Court which was decided vide order dated 18.02.2022 with the direction to submit service appeal before the Khyber Pakhtunkhwa Service Tribunal, if not already filed hence the instant service appeal was filed in the Service Tribunal on 29.03.2022. It was further argued that the appellant was promoted from the post of Junior Clerk to the post of Senior Clerk on 24.11.2021. Consequent upon his promotion, he was transferred/adjusted from GHS Ghapagram Battagram to DEO (F) Battagram against the vacant post. He was not allowed to complete his normal tenure and now after just 2 months he was transferred from DEO (F) Battagram to DEO (M) Battagram and <sup>private</sup> respondent No. 3 was posted in place of the appellant. The impugned order was therefore challenged through departmental appeal on 27.01.2022 which was not decided whereafter the appellant approached the Peshawar High Court in the said Writ Petition. Moreover, the impugned order is violative of Clause I and IV of the Posting Transfer Policy of the Provincial Government which may graciously be set aside, he concluded.

Points raised need consideration. The appeal is admitted to regular hearing, subject to all just and legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments. To come up for reply/comments before the S.B on 04.07.2022. Alongwith the memorandum of appeal there is an application for suspension of operation of the impugned order dated 26.01.2022 till the disposal of instant appeal. Notice of the said application be also sent to the respondent department for written reply/comments.



(Mian Muhammad)  
Member(E)

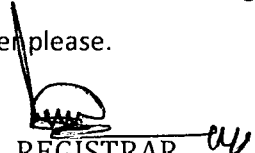
Rs-500/-  
Appellant Deposited  
Security & Process Fee  
A. J. J. / 31/5/22

Form- A

FORM OF ORDER SHEET

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

Case No.- \_\_\_\_\_ 657/2022


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	28/04/2022	<p>The appeal of Mr. Haq Nawaz resubmitted today by Mr. Noor Muhammad Khattak Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-		<p>This case is entrusted to Single Bench at Peshawar for preliminary hearing to be put there on <u>24-05-22</u>. Notices be issued to appellant and his counsel for the date fixed.</p> <p style="text-align: right;">CHAIRMAN</p>

This is an appeal filed by Mr. Haq Nawaz today on 28/03/2022 against transfer notification dated 26-01-2022 against which he preferred/made departmental appeal/representation (no date mentioned), still from the date of impugned notification, the period of ninety days is not yet lapsed as per section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, which is premature as laid down in an authority report as 2005-SCMR-890.

As such the instant appeal is returned in original to the appellant/Counsel. The appellant would be at liberty to resubmit fresh appeal after maturity of cause of action.

No. 779/ST,

Dt. 29-3-/2022.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Noor Muhammad Khattak  
Advocate Peshawar.

- Statutory period of 90 day has been completed, now, the case is mature.  
- Re-submitted after completion.

*JJ* 28/3/22

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

SERVICE APPEAL NO. 657 /2022

HAQ NAWAZ

V/S

EDUCATION DEPTT:

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Dated: \_\_\_\_/.03./2022

**APPELLANT**

Through:

**NOOR MOHAMMAD KHATTAK  
ADVOCATE  
0345-9383141**

/

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

APPEAL NO. \_\_\_\_\_/2022

Mr. Haq Nawaz, Senior Clerk BPS-14,  
District Education Officer Female Battagram  
under transfer to District Education Officer Male Battagram.

.....APPELLANT

**VERSUS**

- 1- The Secretary (E&S) Education Department, Khyber Pakhtunkhwa,  
Peshawar.
- 2- The Director (E&S) Education Department, Khyber Pakhtunkhwa,  
Peshawar.
- 3- Muhammad Sadiq, Senior Clerk BPS-14, O/O District Education  
Officer Male Battagram, under transfer to District Education Officer  
Female Battagram.

..... RESPONDENTS

**APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED  
ORDER DATED 26-01-2022 WHEREBY THE APPELLANT HAS  
BEEN TRANSFERRED FROM DISTRICT EDUCATION OFFICER  
FEMALE DISTRICT BATTAGRAM TO DISTRICT EDUCATION  
OFFICER MALE DISTRICT BATTAGRAM IN UTTER VIOLATION  
OF TRANSFER POSTING POLICY AND AGAINST NOT TAKING  
ACTION ON THE DEPARTMENTAL APPEAL OF APPELLANT  
WITHIN THE STATUTORY PERIOD.**

**PRAYER:**

That on acceptance of this appeal the impugned order dated  
26-01-2022 may very kindly be set aside and the  
respondents may kindly be directed not transfer the  
appellant from Distract Education Office Female Battagram.  
Any other remedy which this august Tribunal deems fit that  
may also be awarded in favor of the appellant.

**R/SHEWETH:**

**ON FACTS:**

***Brief facts giving rise to the present appeal are as  
under:-***

- 1- That the appellant is a law abiding and peaceful citizen serving the  
respondents department.

- 2- That it is pertinent to mention here that through Notification dated 24/11/2021 the appellant has promoted to the post of senior clerk and transferred from GHS Chapagram Battagram to DEO (F) District Battagram against vacant post of Senior Clerk. Copy of the Notification/order dated 24.11.2021 is attached as annex.....**A.**
- 3- That in response to the above Transfer order the appellant was relieved from GHS Chapagram Battagram and accordingly the appellant submitted his charge report at DEO (Female) Battagram.
- 4- That the appellant started performing his duty quite efficiently and up to the entire satisfaction of his superiors but astonishingly the respondent department issued the impugned order dated 26.01.2022 whereby the appellant was transferred from District Education Officer Female District Battagram to District Education Officer Male Battagram and further posted/adjusted private respondent No.4 at his place at District Education Officer Female Battagram. Copy of the impugned order dated 26.01.2022 is annexed as annexure .....**B.**
- 5- That Appellant feeling aggrieved from the impugned transfer order dated 26.01.2022 preferred Departmental appeal before the appellate authority but the same has been response till the expiry of statutory period. That due to dysfunctionality of the Tribunal the appellant preferred Writ petition No.544-P/2022 and the august Peshawar High Court granted interim relief to the appellant vide order dated 18.2.2022. Copies of the Departmental appeal, w.p and order are attached as annexure..... **C, D & E.**
- 6- That as now this august Tribunal is become functional therefore the Appellant preferred the instant appeal on the following grounds amongst the others.

**GROUND:**

- A- That the impugned transfer order dated 26.01.2022 is against the law, facts, norms of natural justice and materials on the record, hence not tenable and liable to be set aside.
- B- That the appellant has not been treated by the respondents in accordance with law and rules on the subject noted above and as such the respondents violated Article-4 and 25 of the Constitution of Islamic Republic of Pakistan, 1973.

- C- That the impugned transfer order dated 26.01.2022 has been issued by the respondents in arbitrary and mala fide manner, hence not tenable and liable to be set aside.
- D- That the impugned transfer order dated 26.01.2022 is based on discrimination, favoritism and nepotism, hence not tenable in the eye of law.
- E- That the impugned transfer order dated 26.01.2022 has neither been in the best interest of public service nor in exigencies of service, hence not tenable and liable to be set aside.
- F- That the impugned transfer orders dated 26.01.2022 is nothing but to harass the appellant and to accommodate her blue eyed person.
- G- That the impugned transfer orders dated 26.01.2022 is violative of Clause-I, IV and XIII of the transfer/posting policy of the Government of Khyber Pakhtunkhwa as the appellant has been transferred prematurely from his current post. Copy of the transfer/posting policy is attached as annexure .....F.
- H- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore, most humbly prayed that the appeal of appellant may be accepted as prayed for.

**APPELLANT**

  
**HAQ NAWAZ**

**THROUGH:**

  
**NOOR MOHAMMAD KHATTAK**

  
**KAMRAN KHAN**

  
**HAIDER ALI**

**&**

  
**UMAR FAROOQ  
ADVOCATES**



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

SERVICE APPEAL NO. \_\_\_\_\_/2022

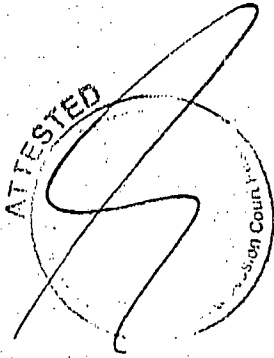
HAQ NAWAZ

VS

EDUCATION DEPTT:

**AFFIDAVIT**

Stated on oath that the contents of the accompanying service appeal are correct to best of my knowledge and belief and nothing has been concealed from this Honorable Service Tribunal.



  
**DEPONENT**

**CERTIFICATE:**

Certify that no earlier service appeal has been filed by the appellant in the instant matter before this Honorable Service Tribunal.

  
**CERTIFICATION**

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

C.M NO: \_\_\_\_\_/2022

IN

SERVICE APPEAL No. \_\_\_\_\_/2022

**MR. HAQ NAWAZ**

**VS**

**EDUCATION DEPTT:**

**APPLICATION FOR SUSPENSION OF OPERATION OF**  
**THE IMPUGNED ORDER DATED 26.01.2022 TILL THE**  
**DISPOSAL OF THE ABOVE MENTIONED APPEAL**

**R/SHEWETH:**

- 1- That the above mentioned appeal along with this application has been filed the appellant before this august service Tribunal in which no date has been fixed so far.
- 2- That appellant filed the above mentioned appeal against the impugned order dated 26.01.2022 whereby the appellant has been transferred from District Education Officer (F) District Battagram to District Education Officer (M) District Battagram.
- 3- That all the three ingredients necessary for the stay is in favor of the appellant.
- 4- That the impugned order dated 26.01.2022 had been issued by the respondents in utter disregard of law and prevailing Rules.


It is therefore, most humbly prayed that on acceptance of this application the operation of the impugned Order dated 26.01.2022 may very kindly be suspended till the disposal of the above mentioned service appeal.

DATED:

APPLICANT

  
HAQ NAWAZ

Through:

  
NOOR MOHAMMAD KHATTAK  
ADVOCATE, HIGH COURT,  
PESHAWAR

# ANNEX A (6)



## Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar

Phone: 091-9225344

Email: ddadm.es@gmail.com

### NOTIFICATION

Consequent upon the recommendation of Departmental Promotion Committee (DPC) in its meeting held on 17-11-2021, the following Junior Clerks (B-11) /Store Keepers (B-7) / ASK (B-6) working in and under the Directorate of E&SE/ DC&TE/ DPD/ NMTD are hereby promoted to the post of Senior Clerks (B-14) on regular basis and posted/ adjusted against vacant post of Senior Clerks (B-14) in the Offices/Institutions as noted against each in the interest of public service with immediate effect.

S#	Name	Father's Name	Design	Present Post	Proposed Post	Remarks
1.	Nazir Shah	Raheem Shah	J/C	GHS Mian Dheri Haripur	GHSS Jhamra Haripur	A.V.P
2.	Hamid Khan	Muhammad Ali Khan	J/C	GHS Jatha Ismail Khel Karak	DEO (M) Karak	A.V.P
3.	Irshad Ahmad	Faqeer	J/C	GGHS Shelk Abad Peshawar	GHSS Kotli Sallh Khana Nowshera	A.V.P
4.	Ghayur Javeed	Muhammad Younas	J/C	GHS Urmar Payan	SDEO (M) Swabi	A.V.P
5.	Mati Ullah	Badshah Gul	J/C	GHSS Billitang Kohat	GHSS Billitang Kohat	A.V.P
6.	Nisar Ahmad	Sultan Mehmood	J/C	GHSS No.3 Peshawar City	GHSS Marati Banda Nowshera	A.V.P
7.	Muhammad Ayaz	Qabat	J/C	GGHSS Cheena Buner	GHSS Amnawar Buner	A.V.P
8.	Amir Nawab Khan	Jahanzeb	J/C	GGHS Kowga Buner	DEO (F) Buner	A.V.P
9.	Ghulam Shabir	Sardar Khan	J/C	GGHSS Shagi Peshawar	GHSS Katlang Mardan	A.V.P
10.	Muhammad Irshad	Dost Muhammad	J/C	GGHSS Kutwal Abbottabad	GHSS Jhamra Haripur	A.V.P
11.	Muhammad Ghulam	Baz Gul	J/C	SDEO (F) SDW Bannu	GHSS Kotka Muhammad Khan Bannu	A.V.P
12.	Shah Saud	Jamshid Khan	J/C	GGHSS Utmanzai Charsadda	GHSS Dheri Likpani Mardan	A.V.P
13.	Ayaz Muhammad	Muhammad Dawood	J/C	GHSS Doga Nowshera	GHSS Jabal Nowshera	A.V.P
14.	Asmat Ullah	Khan Syed Shah	J/C	GHSS Comprehensive Bannu	GGHSS Kakki Bannu	A.V.P

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Chait

JTC

**ATTESTED**

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15.	Abdul Jalil Shah	Mehboob Shah	J/C	GHSS Bangl Khan Bannu	GGHSS Narjuffur Bannu	A.V.P
16.	Qismat Ali Khan	Faiz Ullah Khan	J/C	GHS Bahadar Mannk Khel Bannu	GGHSS Nar Shukrullah Bannu	A.V.P
17.	Abdus Samad	Jan Mohammad	J/C	GHSS Sheikh Yousaf Mardan	GGHSS Ala Mardan	A.V.P
18.	Riaz Khan	Khalil Ud Din	J/C	GHSS Gaddar Mardan	GGHSS Gaddar Mardan	A.V.P
19.	Muhammad Diyar	Abdul Hakeem	J/C	GHS Takht Bhal	GHSS Muhtb Bunda Mardan	A.V.P
20.	Mudassir Shah	Muzammil Shah	J/C	GHS Bail Haripur	GGHSS Panlan Haripur	A.V.P
21.	Muhammad Raftaqat	Abdur Rehman	J/C	GHS Jabri Haripur	GHSS Barkot Haripur	A.V.P
22.	Faizal Mabood	Ain Ullah	J/C	GGHS Kokarai Swat	GGHSS Sakhra Swat	A.V.P
23.	Muhammad Ayub	Abdul Majeed	J/C	GHS Darwesh Haripur	GGHSS Dingl Haripur	A.V.P
24.	Faizal Qadir	Abdullah	J/C	GHSS Sheikhpura Mansehra	DEO (M) Torghar	A.V.P
25.	Rustain Ali	Ghulam Rabbani	J/C	GGHS Sangar Balakot Mansehra	DEO (M) Torghar	A.V.P
26.	Adil Zubair	Muhammad Zubair	J/C	GGHSS Trawra Mansehra	DEO (F) Torghar	A.V.P
27.	Ghayas Ud Din	Moeen Ud Din	J/C	GGHSS Samkoot Dir Upper	GGHSS Samkoot Dir Upper	A.V.P
28.	Faisal Khan	Muhammad Aslam	J/C	GHS Reerh Manshera	GHSS Kaghan Mansehra	A.V.P
29.	Muhammad Irshad	Mumtaz Khan	J/C	GHS Khojaki Kalli Karak	GHSS Kandu Khel Karak	A.V.P
30.	Farid Ullah	Khan Muhammad	J/C	GHS Shahidan Wazir Karak	GHSS Doaba Hangu	A.V.P
31.	Muhammad Ghani	Gul Mehboob	J/C	SDEO (F) Karak	GHSS Dalan Hangu	A.V.P
32.	Rehman Ullah	Gul Bad Shih	J/C	GGHSS Ckokara Karak	GHSS Togh Saral Hangu	A.V.P
33.	Amir Naseem	Naseem Akhter	J/C	GGHSS Shergarh Mansehra	GGHSS Phulra Mansehra	A.V.P
34.	Zubair Khan	All Zar Khan	J/C	GHS Asota Sharif Swabi	GHSS Naranji Swabi	A.V.P

*Chait*

**ATTESTED**

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35.	Rizwan Ullah	Shah Daraz Khan	J/C	GGHS Dherma Khel Bannu	GGHSS Sikandar Khel Bala Bannu	A.V.P
36.	Mukhtiar Ahmad	Abdur Rahim	J/C	GHSS Kotigram Dir Lower	SDEO (M) Samarbagh Dir Lower	A.V.P
37.	Hidayat Ullah	Badshah Rahim	J/C	GHS Watangi Dir Lower	RPD (F) Rehanpur Dir Lower	A.V.P
38.	Fazal Rahman	Abdullah Jan	J/C	GGHSS Paniala DI Khan	GHSS Kiri Shamozal DI Khan	A.V.P
39.	Sami Ul Qadus	Haji Abdul Qadus	J/C	GGHSS No.4 DI Khan	GHSS Lar DI Khan	A.V.P
40.	Hussain Ahmad	Baghi Shah	J/C	GHSS Sikandari Swabi	GHSS Bam Khel Swabi	A.V.P
41.	Muhammad Ibrahim	Badshah Rahim	J/C	GHSS Khall Dir Lower	GHSS Lajbook Dir Lower	A.V.P
42.	Gohar Rehman	Firdos Khan	J/C	DEO (M) Swabi	GGHSS Pabani Swabi	A.V.P
43.	Kifayat Shah	Raj Muhammad	J/C	GGHS Kodinaka Mardan	GGHSS Palo Dheri Mardan	A.V.P
44.	Aslam Khan	Khitab Gul	J/C	GGHSS Rusatn Mardan	GHSS Rustam Mardan	A.V.P
45.	Mansha Ahmad	Muhammad Iqbal	J/C	GGHSS Kangra Haripur	GHSS Kakotri Haripur	A.V.P
46.	Muhammad Zafar	Amir Sultan	J/C	GHS Badwab Lower Dir	GGHSS Shah Alam Baba Lower Dir	A.V.P
47.	Fazal Qayum	Ghulam Farid	J/C	DEO (F) Lakki	DEO (F) Lakki	A.V.P
48.	Shafiq ur Rehman	Rab Nawab	J/C	GGCMHS Karak	GHSS Karbughu Hangu	A.V.P
49.	Mazhar Shah	Gulab shah	J/C	Directorate of Education Merged Area KPK Peshawar NMD	Service placed at the disposal of Addl: Director NMD	A.V.P
50.	Muhammad Inikhar	Nowshier Khan	J/C	Directorate of Education Merged Area KPK Peshawar NMD	Service placed at the disposal of Addl: Director NMD	A.V.P
51.	Shoukat Yousaf	Muhammad Yousaf	J/C	GGHS Kunj Abbottabad	Disposal of DEO (Female) Abbottabad	A.V.P
52.	Muhammad Sadiq Shah	Rizwan Ullah	J/C	GHS Toormang Dir Lower	GHSS Rabat Dir Lower	A.V.P
53.	Atta Ur Rahman	Shams Ur Rahman	J/C	GHS Nawakalay Mingora Swat	GHSS Matta Swat	A.V.P

*Shah*

*JTC*

**ATTESTED**

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54.	Rashid Mehmood	Badri Zaman	J/C	DEO (F) Mansehra	DEO (M) Kohistan Lower	A.V.P
55.	Shakeel Anwar	Muhammad Anwar	J/C	GCHMSS No.1 Haripur	GCHMSS No.1 Haripur	A.V.P
56.	Dildar	All Akbar	J/C	GHS Khaki Mansehra	DEO (F) Torghar	A.V.P
57.	Hayat Muhammad khun	Zubair Khan	J/C	GCMHS Battagram	DEO (F) Kohistan Upper	A.V.P
58.	Raza Muhammad	Adil Muhammad	J/C	GHS Koper Malakand	DEO (F) Malakand	A.V.P
59.	Muhammad Haq Nawaz Khan	Jehandad Khan	J/C	DEO (M) Mansehra	DEO (M) Mansehra	A.V.P
60.	Fazli Wadood	Abdul Wadood	J/C	GGHSS Totakan Mkd	GHSS Totakan Malakand	A.V.P
61.	Muhammad Shoab	Muhammad Hanif	J/C	DEO (F) Tank	GGHS No.1 Tank	A.V.P
62.	Nasir Ullah Khan	Azim Ullah	J/C	GHS Broze Lower Chitral	GHS Broze Chitral	A.V.P
63.	Inam Ul Haq	Shamin Khan	J/C	GGHSS Pacha Kallay Bumer	DEO (F) Buner	A.V.P
64.	Shah Faisal	Said Nawab	J/C	GGCMHS Thana Malakand	Disposal of DEO (M) Malakand	A.V.P
65.	Anwar Ullah	Ghulam Saliheen	J/C	GHS Jughaban Dir Upper	DEO (M) Dir Upper	A.V.P
66.	Nasir Ud Din	Lal Aurang	J/C	GGHSS Batkhela Malakand	DEO (F) Shangla	A.V.P
67.	Muhammad Hamid	Sherin Muhammad	J/C	GGHS Darra Swabi	GHSS Manera Payeen Swabi	A.V.P
68.	Sami Ullah	Haji Muhammad	J/C	DEO (M) Tank	DEO (M) Tank	A.V.P
69.	Ijaz Ahmad	Ghulam Jillani	J/C	GGHS Pirkhel Malkand	DEO (F) Shangla	A.V.P
70.	Akhtar Hussain	Murad Abbas	J/C	GHS Toran Nau Tank	GHSS Gomal Bazar Tank	A.V.P
71.	Zahid Hussain	Muhammad Zarin	J/C	GGHS Qalandi Dir Upper	DEO (M) Dir Upper	A.V.P
72.	Shakir Ullah	Shah Nasim Khan	J/C	DEO (M) Dir Upper	SDEO (M) Dir Upper	A.V.P
73.	Itikhar Raza	Haji Rahman	J/C	DEO (F) Dir Upper	DEO (F) Dir Upper	A.V.P

Chart

*[Signature]*

**ATTESTED**

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74.	Haq Nawaz	Hakim Khan	J/C	GHS Chapagram Battagram	DEO (F) Battagram	A.V.P
75.	Inayat Ur Rahman	Saif Ur Rahman	J/C	GHS Karg (Alai) Battagram	DEO (F) Kohistan Upper	A.V.P
76.	Arshad Javid	Rab Nawaz Khan	J/C	DEO (F) DI Khan	GHSS Dilsa Khan Mandew Bannu	A.V.P
77.	Sahib Zar	Bakht Afsar	J/C	GHSS Khananu Dheri Buner	GHSS Khananu Dheri Buner	A.V.P
78.	Muhammad Irshad	Muhammad Farid	J/C	GHSS Thakra Mansehra	DEO (F) Torghar	A.V.P
79.	Zahoor ur Rehman	Muhammad Aslam	J/C	GCMHSS Kot Najib Ullah Haripur	GCMHSS Kot Najib Ullah Haripur	A.V.P
80.	Sajjad Hussain	Muhammad Rizaz	J/C	GHS Nathia Ghali Abbottabad	Disposal of DEO (F) Abbottabad	A.V.P
81.	Asif Sajjad	Rasool Baksh	J/C	SDEO (M) Kohat	DEO (M) Kohat	A.V.P
82.	Mujahid Shafiq	Muhammad Shafiq	J/C	GHS Kaghzal Kohat	GHSS Dand Saghr Kohat	A.V.P
83.	Abdul Ali Khan	Hanan Khan	J/C	SDEO (M) Mastuj Upper Chitral	Disposal DEO (M) Upper Chitral	A.V.P
84.	Muhammad Saddiq	Ali Zaman	J/C	GGHS Phagla Mansehra	DEO (M) Torghar	A.V.P
85.	Amjid Iqbal	Aman Ullah Khan	J/C	GGHS Dhand Bathwaray Kohat	GHSS Ghumbat Kohat	A.V.P
86.	Arshad Rahim	Rahim Dad	J/C	DEO (F) Karak	DEO Female Karak	A.V.P
87.	Farid Khan	Shah Tamriz Khan	J/C	GHSS Wari Dir Upper	SDEO (M) Wari Dir Upper	A.V.P
88.	Shahzad Saleem	Muhammad Saleem	J/C	GHSS Khotor Haripur	GHSS Nara Amazi Haripur	A.V.P
89.	Nouman Qadar	Faza Qadar	J/C	GGHSS Dir Khass	SDEO (F) Dir Upper	A.V.P
90.	Ali Akbar Badshah	Azeem Ullah Khan	J/C	DEO (F) Dir Lower	DEO (F) Dir Lower	A.V.P
91.	Muhammad Aziz	Hanif Gul	J/C	GHS Dhand Eidal Khel Karak	GHSS Jandri Karak	A.V.P
92.	Inayat Ullah	Aziz Muhammad	J/C	GS Yasir Ahmad Haripur	GHSS S.N Khun Haripur	A.V.P
93.	Hakim Ul Aman	Afzal	J/C	GHS Dehrai Maira Shangla	DEO (M) Shangla	A.V.P

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94.	Niaz Ahmad Avan	Bara Khan	J/C	GHS Maira Amjad Ali Manselira	DEO (M) Kohistan Lower	A.V.P
95.	Aurangzeb	Peroz Khan	J/C	SDEO (F) Dir Upper	SDEO (F) Dir Upper	A.V.P
96.	Amjad Shaheen	Muhammad Amir	J/C	DEO (M) Dir Upper	DEO (M) Dir Upper	A.V.P
97.	Imtiaz Khan	Bakht Zada	J/C	GGHS Bibyawar	DEO (F) Dir Upper	A.V.P
98.	Muhammad Shcr	Umar Zarin	J/C	GHSS Wari dir Upper	SDEO (F) Wari Dir Upper	A.V.P
99.	Nawab Zada	Gul Zada	J/C	GHS Dehrakai Bajaur	Disposal DEO Bajaur	A.V.P
100.	Maryam Bibi	Syed Didar Ali Shah	J/C	RPDC (F) Jamrud Khyber	GGHSS Lahor Swabi	A.V.P
101.	Zulfiqar Ahmad	Sarfraz Khan	J/C	GGHS Haji Mora DI Khan	GGHSS Bangi Khan Khujari Bannu	A.V.P
102.	Sar Zamin Khan	Bukht Afsar	J/C	GGHSS Shadam Buner	GGHSS Shadam Buner	A.V.P
103.	Taj Muhammad	Ali Dad	J/C	GHS Eleel Kandla Kohistan	DEO (M) Upper Kohistan	A.V.P
104.	Abdul Basit	Qasim Khan	J/C	GHSS Sudal Kohat	GHSS Gandyall Kohat	A.V.P
105.	Sher Ahmad Khan	Farid Khan	J/C	GHSS Haripur No.2	DEO (M) Haripur	A.V.P
106.	Syed Muhammad Hassan	Syed Abdul Qasim	J/C	GHSS Lodhi Khel Hangu	GHSS Lodhi Khel Hangu	A.V.P
107.	Tajdar Ali	Foujdar Ali	J/C	GGHSS Daqie Ali Khel Hangu	DEO (F) Hangu	A.V.P
108.	Muhammad Qasim	Akhun Zarin	J/C	SDEO (M) Dir Upper	DEO (M) Dir Upper	A.V.P
109.	Mohsin Khan	Dilbar Khan	J/C	GHS Bosti Khel Dawra Kohat	DEO (F) Kohat	A.V.P
110.	Abdur Rauf	Fazal Hussain	J/C	GGMS Muhammad Hussain Mela T.S.D Darra Kohat	GGHSS Churlakki Kohat	A.V.P
111.	Marjan Ali	Awal Jan	J/C	GHS Spinkai SWTD at Tank	Disposal at DEO SWTD at Tank	A.V.P
112.	Ikram Ullah	Noor Aslam Khan	J/C	Begu Khel Lakki Marwat	GGHSS Titar Khel Lakki Marwat	A.V.P

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113.	Khalid Mehmood	Nasim Badshah	J/C	GHS Totokal Karak	GHSS Bahadar Khel Karak	A.V.P
114.	Muhammad Tahir	Ghulam Khan	J/C	GHSS Jehangiri Karak	DEO (M) Karak	A.V.P
115.	Naseer Khan	Lal Bahader	J/C	GHS Sheraki TSD Darra Kohat	SDEO (F) Ilangu	A.V.P
116.	Fazli Azim	Fazal Wahid	J/C	SDEO (F) Batkhela	DEO (M) Malakand	A.V.P
117.	Muzaffar Khan	Dilawar Khan	J/C	GHS No.1 Nowshera Cantt	DEO (M) Swabi	A.V.P
118.	Ruqes Khan	Baist Khan	J/C	GHS Kaka Khel Lakki Marwat	GHSS Kot Kashmir Lakki Marwat	A.V.P
119.	Jamil Ahmad	Niaz Muhammad	J/C	GHS Land Ahmad Khel Lakki	GHSS Abdul Khel Lakki Marwat	A.V.P
120.	Anwar Iqbal	Faramoosh Khan	J/C	SDEO (M) Batkhela Malakand	DEO (M) Malakand	A.V.P
121.	Fazli Rahim	Fazli Ghani	J/C	GHS Hamid Khan Kalli Mohmand Tribal District	SDEO (F) Upper Mohmand	A.V.P
122.	Syed Imtiaz Hussain	Sayed Ali	J/C	GGHSS Qubad Shah Khel Kurram	Disposal of DEO Kurram	A.V.P
123.	Abdul Qadir	Malik Hassan	J/C	GHS Khanzan Gul Kot Tribal District North Waziristan	GHSS Amandi Umer Khel Bannu	A.V.P
124.	Shoukat Hussain	Munsif Khan	J/C	GGHS Sheikh Ul Bandi Abbottabad	GHSS Chamill Abbottabad	A.V.P
125.	Asad Ali	Sardar Ali	J/C	GGHS Chapper Mishti Orakzai	GHSS Mian Khan Mardan	A.V.P
126.	Miaz Ali Shah	Zarin Shah	J/C	GGHSS Batani Buner	GHSS Batani Buner	A.V.P
127.	Muhammad Ali Khan	Sardar Ali Khan	J/C	GSBAK HSS Serai Naurang Lakki Marwat	GSBAK HSS Serai Naurang Lakki Marwat	A.V.P
128.	Najam Ud Din	Shams Ud Din	J/C	GGHS Inayat Kalli Tribal District Bajaur	GHSS Khar Bajaur	A.V.P
129.	Inam Shah	Bugli Shah	J/C	GHSS Prang Ghar Mohmand Agency	GHSS Prang Ghar Mohmand	A.V.P
130.	Anwar Ali	Tawez Khan	J/C	DEO (F) Orakzai	Disposal of DEO Orakzai	A.V.P

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131.	Zar Karim	Din Muhammad Khan	J/C	GHS Bazeed Khel Orakzai	GHSS Khair Abad Mardan	A.V.P
132.	Mudasir Javed	Muhammad Javed	J/C	GHS Spaidar Orakzai	DEO (M) Hangu	A.V.P
133.	Anwar Ullah Shah	Muhammad Ibrahim	J/C	SDEO (M) Mohmand Lower	Disposal of DEO (M) Mohmand	A.V.P
134.	Muhammad Inam	Muhammad Hakim Shah	J/C	GGHS Ghaljo Orakzai	Disposal of DEO (M) Mardan	A.V.P
135.	Muhammad Tariq	Waris Khan	J/C	DEO Mohmand	Disposal of DEO (M) Mohmand	A.V.P
136.	Muhammad Tufail	Sadi Bad Shah	J/C	GHS Shinkai SWTD Tank	GHSS Silma Sikandar Khel Bannu	A.V.P
137.	Pervaiz Khan	Abdur Rashid	J/C	GGHS Jamrud Khyber	Disposal DEO Khyber	A.V.P
138.	Bahader Sher	Mir Alam Khan	J/C	GHS Chalrai Makeen South Waziristan	GHSS Pindi Khel Bannu	A.V.P
139.	Abrar Hussain	Noor Mohammad	J/C	GSLAHS Mal Kalli Kurram	Disposal of DEO Kurram	A.V.P
140.	Mukamil Khan	Ismail	J/C	GGHS Mian Mandi Momand	Disposal of DEO (F) Mohmand	A.V.P
141.	Wahid Ullah	Dawlat Khan	J/C	DEO (F) Mohmand	Disposal of DEO (M) Mohmand	A.V.P
142.	Asghar Gul	Hayat gul	J/C	Directorate of Education NMDT KPK Peshawar	Disposal of Additional Director NMD	A.V.P
143.	Ibrahim Khan	Ziarat Gul	J/C	Directorate of Education NMD KPK Peshawar	Disposal of Additional Director NMD	A.V.P
144.	Mohammad Ismail	Gul Hassan	J/C	DEO (M) Dir Upper	DEO (M) Dir Upper	A.V.P
145.	Fath Ullah	Abdul Baqi	J/C	GCMHSS Dir Upper	GHSS Gamseer Dir Upper	A.V.P
146.	Said Lawar Shah	Azhar Shah	J/C	GGHS Swari Bumer	DEO (F) Buner	A.V.P
147.	Khan Zaman	Said Zamin Khan	J/C	GGHS Chaper Dir Upper	SDEO (F) Wari Dir Upper	A.V.P
148.	Siyah Ud Din	Miftah Ud Din	J/C	DEO (M) Dir Upper	GHSS Qulandi Dir Upper	A.V.P
149.	Mehbood All Shah	Syed Feroz Shah	J/C	GHSS Saddo Dir Upper	GHSS Manogai Balambat Dir Lower	A.V.P

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150.	Azhar Saeed	Noor Ul Huda	J/C	GHSS Nawagai Buner	DEO (M) Buner	A.V.P
151.	Mushtaq	Gul Rahim Khan	J/C	GGHS Amazo Koto Buner	SDEO (M) Daggarr Buner	A.V.P
152.	Sher Zada	Afsar Khan	J/C	GHS Daggarr No.2 Buner	DEO (M) Buner	A.V.P
153.	Shafi Ullah	Zain Ullah	J/C	GGHSS Ohala Dher Mardan	GGHSS Kattl Gharl Mardan	A.V.P
154.	Sher Ali Khan	Azim Khan	J/C	GHS Ghazni Khel Lakki	GGHSS Ghazni Khel Lakki	A.V.P
155.	Muhammad Ashraf	Milan Muhammad Ikram Jan	J/C	DEO (F) Shangla	DEO (F) Shangla	A.V.P
156.	Bakhtwar Khan	Dilbar	J/C	DEO (M) Shangla	DEO (M) Shangla	A.V.P
157.	Abdul Qadoos	Umbers	J/C	GHSS Olander Shangla	GHSS Kotkay Shangla	A.V.P
158.	Himayat Ullah	Gul Parvez	J/C	SDEO (M) Alpurai Shangla	SDEO (M) Alpurai Shangla	A.V.P
159.	Ikram Ullah Haq	Muhammad Faraz	J/C	GHSS Shahpur Shangla	GHSS Shahpur Shangla	A.V.P
160.	Gohar Iqbal	Talat Iqbal	J/C	DEO (M) Shangla	DEO (F) Shangla	A.V.P
161.	Tariq Shah	Afraseyab	J/C	GCMHS Chkesar Shangla	SDEO (M) Alpuri Shangla	A.V.P
162.	Abdul Salam	Muhammad Younas	J/C	GHS Lilownai Shangla	GHSS Chauga Shangla	A.V.P
163.	Muhammad Hassan	Gul Saqiq	J/C	GHS Damorai Shangla	DEO (M) Shangla	A.V.P
164.	Saeed Akhtar	Gul Akhtar	J/C	DEO (M) Lakki Marwat	DEO (M) Lakki	A.V.P
165.	Rafiq Hayat	Muhammad Qadir	J/C	GHS Baja Swabi	GGHSS Zarohi Swabi	A.V.P
166.	Latif Ullah	KhushWali khan	J/C	SDEO (F) Lower Chitral	Disposal of DEO (F) Upper Chitral	A.V.P
167.	Waqar Ahmad	Muhammad Khan	J/C	GHS Danakool Chkesar Shangla	GGHSS Chakesar Shangla	A.V.P
168.	Muhammad Yasir	Khan Zaman	J/C	DEO (M) Kohistan	SDEO (M) Kohistan Dassu	A.V.P
169.	Shah Jahan	Khan Muhammad	J/C	DEO (M) Kohistan Lower	DEO (F) Kohistan Lower	A.V.P
170.	Bahadar Khan	Muhabat Khan	J/C	DEO (F) Kohistan	DEO (F) Kohistan	A.V.P

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171.	Amjad Khan	Muhammad Qadir Khan	J/C	DEO (F) Kohistan Upper	DEO (M) Kohistan Upper	A.V.P
172.	Ihsan Ul Haq	Gul Zareen	J/C	DEO (F) Kohistan Upper	DEO (M) Upper Kohistan	A.V.P
173.	Muhammad Haneef	Hazrat Ghani	J/C	GHS Paraghri Kolnl Palas Kohistan	DEO (M) Kohistan	A.V.P
174.	Javed Iqbal	Farosh Khan	J/C	GGHSS Tikri Kharari Battagram	GGHSS Bannla Battagram	A.V.P
175.	Taj Ud Din	Abdul Qayum	J/C	DEO (M) Battagram	DEO (F) Battagram	A.V.P
176.	Amjad Ali	Nosherawan Khan	J/C	GGHS Battagram	DEO (F) Battagram	A.V.P
177.	Sher Muhammad	Sher Bahadar		DEO (M) Battagram	DEO (M) Kohistan Lower	A.V.P
178.	Amir Muhammad	Abdul Hakim	J/C	GHS Peshora Battagram	DEO (M) Kohistan Lower	A.V.P
179.	Parvalz Iqbal	Safaraz Khan	J/C	GHS Phagora Battagram	DEO (F) Kohistan Lower	A.V.P
180.	Shams Ur Rahman	Muhammad Hazrat	J/C	GGHS Qadar Killi Malakand	SDEO (F) Shangla	A.V.P
181.	Said Muhammad Khan	Faqeer	J/C	GHSS Asbnar Dir Lower	GHSS Asbnar Dir Lower	A.V.P
182.	Muhammad Raziq	Amir Muhammad	J/C	GHS Khungi Dir Lower	GGHS Saddo Dir Lower	A.V.P
183.	Zia Ur Rahman	Khalista Rahman	J/C	GHS Damtal Dir Lower	GHSS Munda Dir Lower	A.V.P
184.	Bahadar Zaib	Bacha Khan	J/C	GGHSS Nagri Payan Dir Lower	Disposal of DEO (F) Dir Lower	A.V.P
185.	Saim Akhtar	Badshah Zada	J/C	GHS Bagh DushKhail Dir Lower	GGHSS Koktay Palkhel Dir Lower	A.V.P
186.	Amir Nawab Khan	Sarferaz Khan	J/C	SDEO (F) Timergara Dir Lower	SDEO (F) Samar Bagh Dir Lower	A.V.P
187.	Sami Ur Rahman	Ashna Ali Khan	J/C	SDEO (F) Timergara Dir Lower	DEO (F) Dir Lower	A.V.P
188.	Zahir Abass	Abdul Majeed	J/C	GHSS Kolkay Shangla	DEO (M) Shangla	A.V.P

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189.	Fazal Rabbi	Chapoo	J/C	GHS Bar Bela Kohistan Upper	SDEO (F) Kohistan	A.V.P
190.	Imtlaz Khan	Sultan	J/C	SDEO (F) Asenzai Dir Lower	GHSS Chakdara Dir Lower	A.V.P
191.	Muhammad Rizaz	Shams UllHaq	J/C	GGHSS Agra Malakand	DEO (M) shangla	A.V.P
192.	Saif Ullah	Mutabar Khan	J/C	GHSS Bnghdada Mardan	GHSS Kallang Mardan	A.V.P
193.	Hazrat Bilal	Bilal Iqbal	J/C	GGHS Dheri Malakand	DEO (F) Malakand	A.V.P
194.	Muhammad Ayaz	Muhammad Akbar	J/C	SDEO (M) Malakand	SDEO (M) Dargal Malakand	A.V.P
195.	Israr Saced	Muhammed Saced	J/C	DEO (M) Dir Lower	GHSS Tangi Timargera	A.V.P
196.	Badshah Nawab	Shirin Nawab	J/C	GGHSS Asbanr Dir Lower	GCMHS Timargera Dir Lower	A.V.P
197.	Majid Khan	Said Azim Khan	J/C	SDEO (M) Timergara	SDEO (M) Timergara	A.V.P
198.	Irfan Ullah Khan	Atta Ullah Khan	J/C	GGHS Kandaro Dir Lower	GHSS Kombat Dir Lower	A.V.P
199.	Sargand Khan	Sarfaraz Khan	J/C	GGHS Manial Dir Lower	GGHSS Mian kall Dir Lower	A.V.P
200.	Fazal Ullah	Molvi Hafiz UIHaq	J/C	SDEO (M) Samar Bagh Dir Lower	GHSS Mayyar Dir Lower	A.V.P
201.	Zakir Ullah	Muhammad Habib Khan	J/C	GGCMHSS Timergara Dir Lower	GHSS Pingal Dir Lower	A.V.P
202.	Dam Saz Khan	Gul Rais Khan	J/C	GHS Manzini Karak	DEO (M) Karak	A.V.P
203.	Jamshid Ahmad	Muhammad Aslam	J/C	DEO (M) DI Khan	GHSS No.3 DI Khan	A.V.P
204.	Bakhti Rawan	Said Jawhar	J/C	GCMHS Daggar Buner	GHSS Gadl zal Buner	A.V.P
205.	Muhammad Rahman	Abdur Rahman	J/C	DEO (M) Buner	DEO (M) Buner	A.V.P
206.	Altaf Hussain	Zarbahisht	J/C	GHS Karapa Buner	GHSS Chanar Buner	A.V.P
207.	Imran Khan	SherBahadar Khan	J/C	GHS Jowar Buner	GHSS Bampoha Buner	A.V.P
208.	Sana Gul	Bakhtiar Gul	J/C	GHSS Gagra Buner	GHSS Gagra Buner	A.V.P

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209.	Sabir Shah	Said Abdullah Shnh	J/C	GGHSS Pacha Kally Buner	<i>GGHSS Pacha Kally Buner</i>	A.V.P
210.	Muhammad Imran	Muhammad Anwar	J/C	GGHS Bagra Buner	<i>DEO (F) Buner</i>	A.V.P
211.	Shams Ul Hadl	Sahib Zada	J/C	GHSS Karpani Buner	<i>GHSS Kalpani Buner</i>	A.V.P
212.	WazirZada	SherZada	J/C	SDEO (M) Gagra Buner	<i>SDEO (F) Daggarr Buner</i>	A.V.P
213.	Gohar Rahman	Noor Rahman	J/C	GHSS Agaral Buner	<i>GHSS Agaral Buner</i>	A.V.P
214.	Sultan ulah	Said Rahman	J/C	GHSS Ganori Dir Upper	<i>GHSS Khairi Dara Dir Upper</i>	A.V.P
215.	Khalid Khan	Naik Muhammad	J/C	GHS Shung Dir Upper	<i>GHSS Akhgram Dir Upper</i>	A.V.P
216.	Nasar Mohammad	Hazrat Mohammad	J/C	DEO (F) Dir Upper	<i>DEO (F) Dir Upper</i>	A.V.P
217.	Hamid Ur Rahman	Sahib Ur Rahman	J/C	SDEO (M) Dir Upper	<i>SDEO (M) Dir Upper</i>	A.V.P
218.	Masood Alam	Shams Ul Islam	J/C	SDEO (F) Dir Upper	<i>SDEO (F) Dir Upper</i>	A.V.P
219.	MuhiUd Din	Sultan Salim	J/C	GHSS Shringal Dir Upper	<i>GHSS Berari Dir Upper</i>	A.V.P
220.	Gohar All	Habib Ur Rahman	J/C	DEO (M) Dir Upper	<i>DEO (M) Dir Upper</i>	A.V.P
221.	MoeenUd Din	Said Alam	J/C	GHSS Shringal Dir Upper	<i>GHSS Sheringal Dir Upper</i>	A.V.P
222.	Jamal Ud Din	NizamUd Din	J/C	GGHS Sundal	<i>SDEO (F) Wari Dir Upper</i>	A.V.P
223.	Ihtisham Ullah	Inayat Ullah	J/C	DEO (F) Dir Upper	<i>DEO (F) Dir Upper</i>	A.V.P
224.	Halder Hussain	Zakir Ullah	J/C	GHSS Sawnl Dir Upper	<i>GHSS Sawnl Dir Upper</i>	A.V.P
225.	Muhammad Parvez	Gul Faraz Khan	J/C	GHSS Banda Dir Upper	<i>GHSS Ganori Dir Upper</i>	A.V.P
226.	Alam Zeb	Sher Zamin	J/C	GHSS Barwal Bandl Dir Upper	<i>GHSS Barwal Bandl Dir Upper</i>	A.V.P
227.	Muhammad Ruz Khan	Pedad Khan	J/C	SDEO (M) Tlnergara	<i>GHSS Akhgram Dir Upper</i>	A.V.P
228.	Zia Ul Haq	Amir Alam Khan	J/C	GHSS Luqman Banda Dir Upper	<i>GHSS Luqman Banda Dir Upper</i>	A.V.P

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229.	Baldar Ullah	Samandar Khan	J/C	SDEO (F) Worl Dir Upper	GHSS Jutgram Dir Upper	A.V.P
230.	Sultan Nabi	Muhammad Yar Khan	J/C	GHS Nagrai Dir Upper	SDEO (F) Warhal Dir Upper	A.V.P
231.	Aziz Subhan	Muhammad Jan	J/C	GGHSS Gandigar Dir Upper	GGHSS Gandigar Dir Upper	A.V.P
232.	Ikhtiar Hussain	Sultan Ali	J/C	GISHS Parachinar District Kurram	Disposal of DEO Kurram	A.V.P
233.	Muhammad Islam	Asfandiyar Khan	J/C	GHSS Patrak Dir Upper	GHSS Patrak Dir Upper	A.V.P
234.	Muhammad Shahid	Ghulam Rabbani	J/C	GGHS Khan Mast Colony Peshawar	GGHSS Babuzai Mardan	

Note:-

1. Charge report should be submitted to all concerned.
2. All the DEOs (M/F) concerned are directed to handover charge to the newly promotee Senior Clerks in the station mentioned against each and if the said post is filled by your office then he may be adjusted at your own level being competent authority.

**Dr Hafiz Muhammad Ibrahim**  
**DIRECTOR**  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

Enclst: No. 3090-3102 / A-23/MS/Proposal JC to SC/ 2021.

Dated Peshawar the 24/11/2021

Copy of the above is forwarded for the information and necessary to the:-

1. Account General, Khyber Pakhtunkhwa Peshawar.
2. Director Curriculum & Teaching Education, Khyber Pakhtunkhwa, Abbottabad.
3. Additional Director of Education NMD Peshawar.
4. Director DPD Khyber Pakhtunkhwa, Peshawar.
5. District Education Officers (Male & Female) concerned.
6. District Account Officers concerned.
7. Principals/ Headmasters/Headmistresses concerned.
8. Sub: Division Education Officers (Male & Female) concerned.
9. Assistant Director (Exam) at DPD Peshawar.
10. Officials concerned.
11. PA to Director E&SE Khyber Pakhtunkhwa, Peshawar.
12. PA to Additional Director (Estab-II) E&SE Khyber Pakhtunkhwa, Peshawar.
13. Master File.

  
Deputy Director (F&A)  
E&SE Khyber Pakhtunkhwa, Peshawar

**ATTESTED**



**ANNEX B 19**

**Office Order**

The posting/transfer in respect of the following Ministerial Staffs is hereby ordered in their own pay and BPS in the interest of public service with effect from the date of their taking over charge.

S. #	Name/Design:	Present Posting	Adjusted at	Remarks
1	Mr. Syed Riaz Hussain Shah Office Assistant B-16	DEO(Male) Battagram	DEO(Female) Battagram	V.S.No.2
2	Mr. Abdul Razaq Office Assistant B-16	DEO(Female) Battagram	DEO(Male) Battagram	V.S.No-1
3	Muhammad Sadiq S/Clerk B-14	DEO(Male) Battagram	DEO(Female) Battagram	V.S No.4
4	Haq Nawaz S/Clerk B-14	DEO(Female) Battagram	DEO(Male) Battagram	V.S No.3
5	Sher Muhammad S/Clerk B-14	GHSS Paimal Sharif Battagram	DEO(Female) Battagram	V.S No.6
6	Taj Ud Din S/Clerk B-14	DEO(Female) Battagram	GHSS Paimal Sharif Battagram	V.S No.5
7	Asgher Hayat J/Clerk B-11	DEO(Male) Battagram	DEO(Female) Battagram	V.S No.8
8	Niaz-Ul-Haq J/Clerk B-11	DEO(Female) Battagram	DEO(Male) Battagram	V.S No.7
9	Murshad Alam KPO B-16	DEO(Male) Battagram	DEO(Female) Battagram	A.V.P

Note:-

1. Compliance report should be submitted to all concerned.
2. No TA/DA etc is allowed.

**DIRECTOR**  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar

1- Endst: No. 9489-94 /F.No. /A-23/MS/Battagram

Dated Peshawar the 26/11/2022

Copy forwarded to the:-

1. District Education Officer (Male/Female) Concerned
2. District Account Officer concerned.
3. Principal concerned.
4. Official concerned.
5. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
6. Master File.

**Assistant Director (Admn)**  
Directorate E& Secondary Education  
Khyber Pakhtunkhwa, Peshawar

Assistant/S/Clerk/J/Clerk Battagram

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ANNEX C

20

To

1. Secretary Elementary & Secondary  
Education Department Khyberpakhtum Khwa  
Peshawar

2. The Director  
E&SE Khyber Pakhtunkhwa Peshawar

Subject: APPEAL REGARDING CANCELLTION OF TRANSFER

It is stated that the applicant was serving as senior clerk B-14 under your kind control at DEO Female Office Battagram.

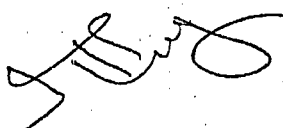
It is stated that applicant has been promoted to Senior Clerk recently on 24-11-2021 vide No-3090-3102/A-23/MS/Proposal J/C to S/C 2021 Dated Peshawar the 24-11-2021.

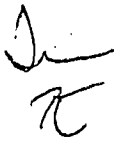
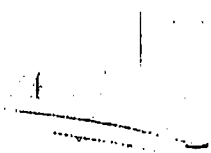
It is stated that I am performing my duty regularly and there is no complaint against me.

It is also brought in to your kind notice that I have been illegally transfer from DEO Female Battagram on political basis vide Directorate No-9489-94/F-No/A-23/MS/Battagram dated Peshawar the 26-01-2022.

Keeping in view the above as well as tenure of the applicant your honor is requested to cancel the transfer of the applicant issued vide above letter. I shall be very thankful to you for this act of kindness please.

Enclosers: All transfer copies are attached for record.

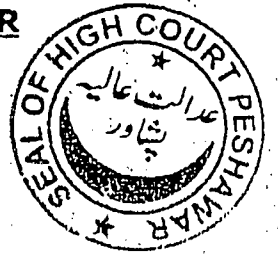
  
HAQ NAWAZ  
SENIOR CLERK OFFICE OF DEO (F)  
BATTAGRAM

  
  
ATTESTED

ANNEX D

21

**BEFORE THE PESHAWAR HIGH COURT, PESHAWAR**



WRIT PETITION NO. \_\_\_\_\_/2022

Mr. Haq Nawaz, Senior Clerk BPS-14,  
District Education Officer Female Battagram under transfer to District  
Education Officer Male Battagram.

.....PETITIONER

**VERSUS**

- 1- The Secretary (E&S) Education Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director (E&S) Education Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The District Education Officer Male District Battagram.
- 4- The District Education Officer Female District Battagram.
- 5- Muhammad Sadiq Senior Clerk BPS-14 District Education Officer Male Battagram, under transfer to District Education Officer Female Battagram.

.....RESPONDENTS

**WRIT PETITION UNDER ARTICLE 199 OF THE  
CONSTITUTION OF ISLAMIC REPUBLIC OF  
PAKISTAN 1973 AS AMENDED UP TO DATE**

**R/SHEWETH:**

**ON FACTS:**

*Brief facts giving rise to the present appeal are as  
under:-*

- 1- That petitioner is a law abiding and peaceful citizen serving the respondents department.
- 2- That it is important to mention here that through Notification dated 24/11/2021 the petitioner has promoted to the post of senior clerk and transferred from GHS Chapagram Battagram to DEO (F) District Battagram against vacant post of Senior Clerk. Copy of the Notification/order dated 24.11.2021 is attached as annex.....A.
- 3- That in response to the above Transfer order the petitioner was relieved from GHS Chapagram Battagram and accordingly the petitioner submitted his charge report at DEO (Female) Battagram.

WP544-2022 HAQ NAWAZ VS GOVT CF.pdf

**ATTESTED**  
**EXAMINER**  
Peshawar High Court

- 4- That petitioner started performing his duty quite efficiently and up to the entire satisfaction of his superiors but astonishingly the respondent department issued the impugned order dated 26.01.2022 whereby the petitioner was transferred from District Education Officer Female District Battagram to District Education Officer Male Battagram and further posted/adjusted private respondent No.4 at his place at District Education Officer Female Battagram. Copy of the impugned order dated 26.01.2022 is annexed as annexure.....B.
- 5- That petitioner feeling aggrieved from the impugned transfer order dated 26.01.2022 preferred Departmental appeal before the petitioner authority but the same has been response till the expiry of statutory period .Copy of the Departmental appeal is attached as annexure..... C.
- 6- That as the august Service Tribunal is non-functional due retirement of the Honorable Chairman therefore the petitioner having no other remedy but to file the instant writ petition on the following grounds amongst the others.

**GROUNDS:**

- A- That the impugned transfer order dated 26.01.2022 to the extent of petitioner and privet respondent is against the law, facts, norms of natural justice and materials on the record, hence not tenable and liable to be set aside.
- B- That the petitioner has not been treated by the respondents in accordance with law and rules on the subject noted above and as such the respondents violated Article-4 and 25 of the Constitution of Islamic Republic of Pakistan, 1973.
- C- That the impugned transfer order dated 26.01.2022 has been issued by the respondents in arbitrary and mala fide manner, hence not tenable and liable to be set aside.
- D- That the impugned transfer order dated 26.01.2022 is based on discrimination, favoritism and nepotism, hence not tenable in the eye of law.
- E- That the Impugned transfer order dated 26.01.2022 has neither been in the best interest of public service nor in exigencies of service, hence not tenable and liable to be set aside.

**ATTESTED**  
EXAMINER  
Peshawar High Court

F- That the impugned transfer order dated 26.01.2022 is nothing but to harass the petitioner and to accommodate her blue eyed person.

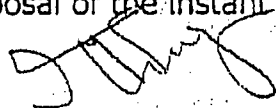
G- That the impugned transfer order dated 26.01.2022 is violative of Clause-I, IV and XIII of the transfer/posting policy of the Government of Khyber Pakhtunkhwa as the petitioner has been transferred prematurely from his current post. Copy of the transfer/posting policy is attached as annexure .....D.

H- That petitioner seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore, most humbly prayed that on acceptance of this writ petition the action of the respondent No.2 by issuing the impugned transferred dated 26-01-2022 to the extent of petitioner in utter violation of the transfer/posting policy may be declared as illegal, unconstitutional and in effective upon the rights of the petitioner. That the respondent No.2 may please be directed to set aside he impugned transferred order dated 26-01-2022 to the extent of the petitioner and private respondent. Any other remedy which this august Court deems fit that may also be awarded in favor of the petitioner.

**INTERIM RELIEF:**

That the operation of the impugned Notification dated 26-01-2022 may kindly be suspended till the disposal of the instant writ petition.



**PETITIONER**

**HAQ NAWAZ**

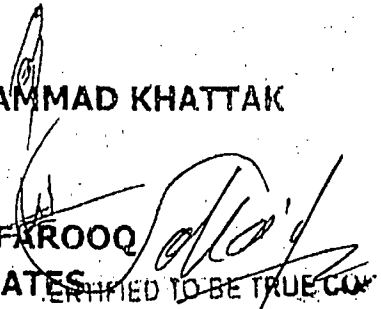
**THROUGH:**

**NOOR MOHAMMAD KHATTAK**

**&**

**UMAR FAROOQ**

**ADVOCATES**



EXAMINER  
Peshawar High Court, Peshawar  
Authorised Under Article 177 of  
Constitution of 1973, Order 108

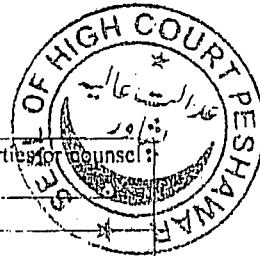
ANNEX E

24

**PESHAWAR HIGH COURT PESHAWAR**

Form "A"

**Order Sheet**



Date of Order or Proceedings	Order or other Proceedings with Signature of Judge or that of parties or counsel where necessary
2	3

18.02.2022

**WP 544-P/2022 with IR.**

Present:

Mr. Noor Muhammad Khattak, Advocate, for the petitioner.

\*\*\*\*\*

**S M ATTIQUE SHAH, J: -** As the subject matter of instant writ petition as well as the connected **WP 543-P/2022 "Taj-ud-Din Vs Govt of KP"**, was one and same; therefore, were taken up jointly and; in view of the detailed reasons recorded therein, the instant petition is also disposed of in terms thereof.

**Announced:**  
18.02.2022

*[Signature]*  
JUDGE

*[Signature]*  
JUDGE

**ATTESTED**  
EXAMINER  
Peshawar High Court

Nazir

(D.B)

Hon'ble Mr. Justice S M Attique Shah, J  
Hon'ble Mr. Justice Muhammad Faisem Wali, J

*[Signature]*  
CERTIFIED TO BE TRUE COPY

EXAMINER  
Peshawar High Court, Peshawar  
Attested Under Article 87 of  
the Constitution of Pakistan

04 MAR 2022

**PESHAWAR HIGH COURT PESHAWAR**

Form "A"

**Order Sheet**



Date of Order or Proceedings	Order or other Proceedings with Signature of Judge or that of parties or counsel where necessary
2	3
18.02.2022	<p><b><u>WP 543-P/2022 with IR.</u></b></p> <p>Present:</p> <p>Mr. Noor Muhammad Khattak, Advocate, for the petitioner.</p> <p>*****</p> <p><b><u>S M ATTIQUE SHAH, J: -</u></b> Through this single order, we intend to dispose of four writ petitions; the instant as well as the connected <b><i>WP 544-P/2022 "Haq Nawaz Vs Govt of KP"</i></b>; <b><i>WP 545-P/2022 "Mst. Sira Vs Director Elementary &amp; Secondary Education"</i></b>, <b><i>WP 564-P/2022 "Mst. Rakhsanda Vs Govt of KP"</i></b> as in all these petitions, the petitioners have challenged their respective transfer orders and; prayed for cancellation of the same.</p> <p>2. Briefly narrated facts are that petitioners Taj-ud-Din and Haq Nawa have been serving as Senior Clerks in the office of DEO (Female) Battagram since, 24.11.2021 while petitioners Mst. Saira (Drawing</p>

**ATTESTED**  
EXAMINER  
Peshawar High Court

Teacher) and Mst. Rakhshanda (Theology Teacher) have been serving on their respective posts in GGMS Banda Kachori and GGHS Suhder, Swabi respectively since, 27.01.2022 and 12.01.2022. The respondents, however, again transferred them vide orders dated 26.01.2022, & 08.02.2022 respectively in utter violation of Transfer/Posting Policy of the Government.

3. Learned counsel for the petitioners contended that the petitioners have never been allowed to complete their normal tenure and are prematurely transferred vide the impugned transfer orders. When questioned about the availability of alternate remedy, learned counsel for the petitioners stated that on the retirement of the incumbent Chairman, the Khyber Pakhtunkhwa Service Tribunal, Peshawar is not functional, which fact was also confirmed by Mr. Rabnawaz Khan, worthy AAG.

3. In view of the above and; particularly when the Khyber Pakhtunkhwa Service Tribunal is not functional; besides, on tentative assessment, we find that prima facie case exists in favour of the

ATTESTED  
EXAMINER  
Peshawar High Court

petitioner, as such, it is directed that status quo be maintained till the first hearing before the Khyber Pakhtunkhwa Service Tribunal. However, petitioner is directed to submit Service Appeal before the Khyber Pakhtunkhwa Service Tribunal in this regard, if not already filed.

4. This petition as well as the connected petitions are disposed of in the above terms.

**Announced:**  
18.02.2022

*[Signature]*  
JUDGE  
*[Signature]*  
JUDGE

*[Signature]*  
CERTIFIED TO BE TRUE COPY

EXAMINER  
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
Khyber Pakhtunkhwa Service Tribunal  
Khyber Pakhtunkhwa Service Tribunal

04 MAR 2022

No. 27699  
Date of Presentation of Application 10/3/2022  
No of Pages 79  
Copying fee 50/-  
Total 581/-  
Date of Preparation 04/3/2022  
Date of Delivery of 04/3/2022  
Received By Ahmad

"Nazir"

(D.O)

Hon'ble Mr. Justice S M Attique Shah, J

Hon'ble Mr. Justice Muhammad Faheem Wali, J





GOVERNMENT OF NWFP  
ESTABLISHMENT & ADMINISTRATION  
DEPARTMENT  
(Regulation Wing)

POSTING / TRANSFER POLICY OF THE PROVINCIAL GOVERNMENT.

- i) All the posting/transfers shall be strictly in public interest and shall not be abused/misused to victimize the Government servants
- ii) All Government servants are prohibited to exert political, Administrative or any other pressures upon the posting/transfer authorities for seeking posing/transfers of their choice and against the public interest.
- iii) All contract Government employees appointed against specific posts, can not be posted against any other post.
- iv) The normal tenure of posting shall be three years subject to the condition that for the officers/officials posted in unattractive areas the tenure shall be two years and for the hard areas the tenure shall be one year. The unattractive and hard areas will be notified by the Government.
- v) {
- vi) While making postings/transfer from settled areas to FATA and vice-versa, specific approval of Governor, NWFP needs to be obtained
- While making postings/transfers of officers/officials up to BS-17, from settled areas to FATA and vice-versa approval of the Chief Secretary NWFP needs to be obtained. Whereas, in case of posting/transfer of officers in BS-18 and above, from settled areas to FATA and vice versa, specific approval of the Governor NWFP shall be obtained.
- vi (a) All Officers/officials selected against Zone-I/FATA quota in the Provincial Services should compulsorily serve in FATA for atleast eighteen months in each grade. This should start from senior most scales/grades downwards in each scale/grade of each cadre.
- vii) Officers may be posted on executive/administrative posts in the Districts of their domicile except District Coordination Officers (D.C.Os) and DPOs/Superintendent of Police (SP). Similarly Deputy Superintendent of Police (DSP) shall not be posted at a place where the Police Station (Thaana) of his area/residence is situated.
- viii) No posting/transfers of the officer's/officials on detailment basis shall be made.
- ix) Regarding the posting of husband/wife, both in Provincial services, efforts where possible would be made to post such persons at one station subject to the public interest.
- x) All the posting/transferring authorities may facilitate the posting/transfer of the unmarried female government Servants at the station of the residence of their parents.

ATTESTED

to be transcribed

Advocate

Para-1(v) regarding months of March and July for posting/transfer and authorities for relaxation of ban deleted vide letter No. SOR-VI (E&AD) 1-4/2008/Vol-VI, dated 3-6-2008. Consequently authorities competent under the NWFP Government Rules of Business, 1985, District Government Rules of Business 2001, Posting/Transfer Policy and other rules for the time being in force, allowed to make posting/transfer subject to observance of the policy and rules. Added vide Urdu circular letter No. SOR-VI(E&AD)1-4/2003, dated 21-09-2004

ATTESTED

Posting - Transfer Policy - updated (11/10 Jan, 2009)

- xi) Officers/officials except DCOs and DPOs/SPs who are due to retire within one year may be posted on their option on posts in the Districts of their domicile and be allowed to serve there till the retirement.  
DCOs and DPOs who are due to retire in the near future may also be posted in the District of their domicile subject to the condition that such posting would be against non-administrative posts of equivalent scales;
- xii) In terms of Rule-17(1) and (2) read with Schedule-III of the NWFP Government Rules of Business 1985, transfer of officers shown in column 1 of the following table shall be made by the authorities shown against each officer in column 2 thereof:

Outside the Secretariat	
1.	Officers of the all Pakistan Unified Group i.e. DMG, PSP including Provincial Police Officers in BPS-18 and above.
	Chief Secretary in consultation with Establishment Department and Department concerned with the approval of the Chief Minister.
2.	Other officers in BPS-17 and above to be posted against scheduled posts, or posts normally held by the APUG, PCS(EG) and PCS(SG).
	-do-
3.	Heads of Attached Departments and other Officers in B-19 & above in all the Departments.
	-do-
In the Secretariat	
1.	Secretaries
	Chief Secretary with the approval of the Chief Minister.
2.	Other Officers of and above the rank of Section Officers: a) Within the Same Department b) Within the Secretariat from one Department to another.
	Secretary of the Department concerned. Chief secretary/Secretary Establishment.
3.	Officials up to the rank of Superintendent: a) Within the same Department b) To and from an Attached Department c) Within the Secretariat from one Department to another
	Secretary of the Department concerned. Secretary of the Dept in consultation with Head of Attached Department concerned. Secretary (Establishment)

xiii) While considering posting/transfer proposals all the concerned authorities shall keep in mind the following:

- a) To ensure the posting of proper persons on proper posts, the Performance Evaluation Report/annual confidential reports, past and present record of service, performance on post held presently and in the past and general reputation with focus on the integrity of the concerned officers/officials be considered.
- b) Tenure on present post shall also be taken into consideration and the posting/transfers shall be in the best public interest.

Added vide Urdu circular letter No: SOR-VI (E&AD)/1-4/2005, dated 9-9-2005.

ATTESTED  
to be true copy  
Advocate

ATTESTED

xiv) Government servants including District Govt. employees feeling aggrieved due to the orders of posting/transfer authorities may seek remedy from the next higher authority / the appointing authority as the case may be through an appeal to be submitted within seven days of the receipt of such orders. Such appeal shall be disposed of within fifteen days. The option of appeal against posting/ transfer orders could be exercised only in the following cases.

- i) Pre-mature posing/transfer or posting transfer in violation of the provisions of this policy.
- ii) Serious and grave personal (humanitarian) grounds.

2. To streamline the postings/transfers in the District Government and to remove any irritant/confusions in this regard the provision of Rule 25 of the North West Frontier Province District Government Rules of Business 2001 read with schedule - IV thereof is referred. As per schedule-IV the posting/transferring authorities for the officers/officials shown against each are as under:-

S. No.	Officers	Authority
1.	Posting of District Coordination Officer and Executive District Officer in a District.	Provincial Government.
2.	Posting of District Police Officer.	Provincial Government
3.	Other Officers in BPS-17 and above posted in the District.	Provincial Government
4.	Official in BPS-16 and below	Executive District Officer in consultation with District Coordination Officer.

3. As per Rule 25(2) of the Rules mentioned above the District Coordination Department shall consult the Government if it is proposed to:

- a) Transfer the holder of a tenure post before the completion of his tenure or extend the period of his tenure.
- b) Require an-officer to hold charge of more than one post for a period exceeding two months.

4. I am further directed to request that the above noted policy may be strictly observed /implemented.

All concerned are requested to ensure that tenures of the concerned officers/officials are invariably mentioned in summaries submitted to the Competent Authorities for Posting/Transfer.  
{Authority: Letter No: SOR-VI/E&AD/1-4/2003 dated 24-6-2003}.

It has been decided by the Provincial Government that posting/transfer orders of all the officers up to BS-19 except Heads of Attached Departments irrespective of grades will be notified by the concerned Administrative Departments with prior approval of the Competent Authority obtained on the Summary. The Notifications/orders should be issued as per specimen given below for guidance.

All posting/transfer orders of BS-20 and above and Heads of Attached Departments (HAD) shall be issued by the Establishment Department and the Administrative Departments shall send approved Summaries to E&A Department for issuance of Notifications.

ATTESTED

ATTESTED

Handwritten signatures and initials on the right margin.

31

**VAKALATNAMA**

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

APPEAL NO: \_\_\_\_\_ OF 2022

Hoq Nawaz \_\_\_\_\_ (APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

**VERSUS**

Education Deptt. \_\_\_\_\_ (RESPONDENT)  
(DEFENDANT)

I/We Mr. Hoq Nawaz  
Do hereby appoint and constitute **NOOR MUHAMMAD KHATTAK Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. \_\_\_\_/\_\_\_\_/2022

[Signature]  
CLIENTS

[Signature]  
**ACCEPTED**  
NOOR MUHAMMAD KHATTAK  
[Signature]  
KAMRAN KHAN

[Signature]  
**HAIDER ALI**  
&  
**KHANZAD GUL**  
**ADVOCATES**

**"A"**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**  
JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR.

No.

SB

APPEAL No.....657..... of 2022.

Has Nawaz

Appellant/Petitioner

Versus

Secy ESSE KPK Peshawar

RESPONDENT(S)

Respondent (1)

Notice to Appellant/Petitioner

Secy ESSE Department KPK Peshawar

[Signature]  
29/6

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 04/07/2022 at 9:30 AM

(Copy of Appeal is attached)

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

(For Reply)

[Signature]

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.