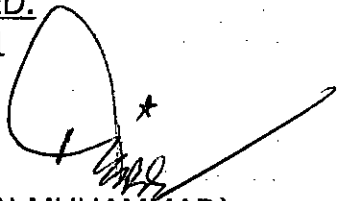
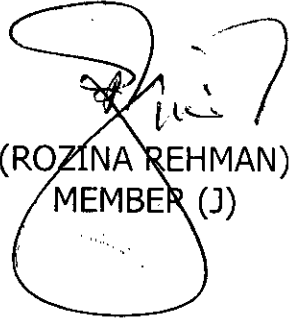


S.No	Date of order/ proceedings	Order or other proceedings with signature of Judge or Magistrate and that of parties where necessary.
1	2	3
	22.03.2021	<p><u>Present.</u></p> <p>Amir Raziq Shah, ... For appellant Advocate</p> <p>Kabir Ullah Khattak, ... For respondents Additional Advocate General</p> <p>Vide our detailed judgment of today of this Tribunal placed on file, instant service appeal is dismissed. Parties are left to bear their own costs. File be consigned to the record room.</p> <p><u>ANNOUNCED.</u> 22.03.2021</p> <p> (MIAN MUHAMMAD) MEMBER (E)</p> <p> (ROZINA REHMAN) MEMBER (J)</p>

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. 332/2020

Date of Institution ... 10.01.2020  
Date of Decision ... 22.03.2021

Mir Nawaz Principal of Government High School Kandi Zarin  
Khel, Hassan Khel, Sub Division Peshawar.

... (Appellant)

**VERSUS**

Government of Khyber Pakhtunkhwa through Chief Secretary of  
Khyber Pakhtunkhwa at Civil Secretariat Peshawar and four  
others.

... (Respondents)

Amir Raziq Shah,  
Advocate

... For appellant.

Kabir Ullah Khattak,  
Additional Advocate General

... For respondents.

ROZINA REHMAN  
MIAN MUHAMMAD

... MEMBER (J)  
... MEMBER (E)

**JUDGMENT**

ROZINA REHMAN, MEMBER : Through the instant appeal the  
appellant Mir Nawaz impugns the office order dated 12.02.2019  
issued by the Secretary Elementary & Secondary Education Khyber  
Pakhtunkhwa whereby the appellant was transferred and posted as  
H.M (BPS-17) G.H.S Toot Qamar Khyber.

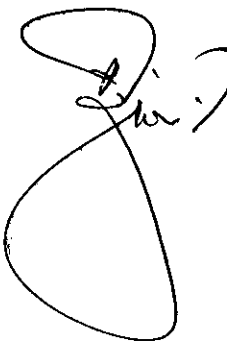


2. Learned counsel for appellant contended that the impugned transfer order is illegal, unlawful and void ab-initio. He further submitted that the transfer order is not only premature but also politically motivated which is against the principle of equality as enshrined in Article-4 & 25 of the Constitution of Islamic Republic of Pakistan, 1973. He submitted that appellant moved Writ Petition before the august High Court for redressal of his grievances and that the impugned transfer order was suspended by the august Court and sent the Writ Petition to the Department with directions to consider the same as a departmental appeal and to decide the same according to law but the same was not responded to, hence, this service appeal was filed. He argued that the impugned transfer order is illegal, against law and facts being against the normal tenure of transfer policy. He submitted that the impugned transfer order is malicious for the reason that as per the impugned notification, officers at Serial No.6, 7, 19, 141, 170 and 194 were transferred to the post of Principal of Higher Pay Scale in their own pay and scale, whereas, the appellant was transferred and posted as S.S.T (BPS-17) which is clear discrimination and lastly, he submitted that appellant being cardiac and diabetic patient, may be posted at a nearby station as it is difficult for him to perform his duties at a far flung area i.e. Toot Qamar Khyber.

3. On the other hand, learned A.A.G submitted that due to non availability of vacant post, nearest to the appellant, he was adjusted on the post of BPS-18 on temporary basis just on humanitarian

ground. He submitted that every civil servant falling under the ambit of Section-2(b) of the Khyber Pakhtunkhwa Civil Servants Act 1973, is legally bound to serve the Department to the entire satisfaction of the competent authority and that now due to the availability of vacant post in the District Khyber, appellant was adjusted against the post of Headmaster (BPS-17).

4. As per record, appellant Mir Nawaz is an S.S.T (BPS-17) in the respondents' Department. He was transferred and posted as Incharge Principal (BPS-18) at G.H.S Kandi Zarin Khel in his own pay and scale vide order dated 25<sup>th</sup> July, 2017. It was on 12.02.2019 when he was transferred from the said school to Government High School Toot Qamar Khyber as Headmaster (BPS-17). He filed departmental appeal on 14.02.2019 which was properly forwarded by D.E.O to Additional Director Education on 28.02.2019 where-after, he filed Writ Petition in the august High Court on 04.03.2019 and vide order dated 28.03.2019 of the august High Court, Petition was disposed of in the following terms:



"The petitioner has already submitted appeal/representation to the concerned authorities on 01.03.2019, which is still pending. The respondents were bound to dispose of the appeal/representation within the prescribed period provided under the rule i.e. 15 days. But the respondents did not decide the appeal/representation within the prescribed period, therefore, the petitioner may approach the Service

Tribunal against his transfer order, however, in the meanwhile, status quo be maintained."

5. As per record, Writ Petition was disposed of on 28.03.2019, whereas, the present service appeal was filed on 10.01.2020 which is badly time barred. It has been held by the Apex Court in Khan Sahib Sher Muhammad Mir's case (1987 SCMR 92) that when an appeal is required to be dismissed on limitation, its merits need not be discussed.

6. It merits a mention here that the present appellant was transferred against the vacant post of BPS-18 (G.H.S Zarin Khel) vide order dated 16<sup>th</sup> June, 2017. As per transfer posting policy, normal tenure is two years but the appellant has been enjoying the said post since June, 2017.

7. In view of the foregoing reasons, instant service appeal is dismissed. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED.  
22.03.2021

  
(MIAN MUHAMMAD)  
MEMBER (E)

  
(ROZINA REHMAN)  
MEMBER (J)

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA**  
**SERVICE TRIBUNAL**



CM # \_\_\_\_\_/2021

In

Service Appeal No. 332/2020

*Put up to the court with relevant app-ml.*

Mir Nawaz

**Versus**

Government of KPK and others

*The date already fixed is only one month away shall remain posted to 27/3/2021.*

*22/2/2021*

*Reader*

**APPLICATION FOR EARLY FIXATION**  
**OF THE CAPTIONED CASE.**

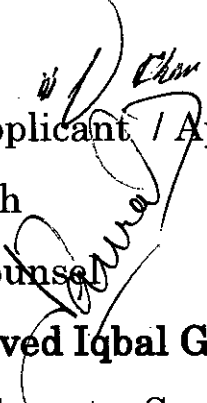
Respectfully Sheweth,

1. That the captioned case is pending adjudication before this Hon'ble Court and is fixed for 22-03-2021.
2. That infact the post of Head Master at Govt. High School, Said Azam Killi, HSD, Peshawar has been vacated since 11-02-2021. It is important to note here that the applicant / appellant had already moved an application through the worthy District Education Officer Hassan Khel S/D Peshawar for transfer to the said post, whereby DEO Hassan Khel recommended the request of the appellant.

3. That the respondent department is going to fill up the vacant post in the up coming days.
4. That in the given circumstances of the case the early fixation of the case is indispensable.

*It is, therefore, most humbly prayed that on acceptance of the instant application, the above title case may kindly be fixed for an earlier date.*

Dated: 22-02-2021

  
Applicant / Appellant  
Through  
Counsel  
**Javed Iqbal Gulbela**  
Advocate, Supreme Court  
Pakistan.

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA**  
**SERVICE TRIBUNAL**

CM # \_\_\_\_\_/2021

In

Service Appeal No. 332/2020

Mir Nawaz

**Versus**

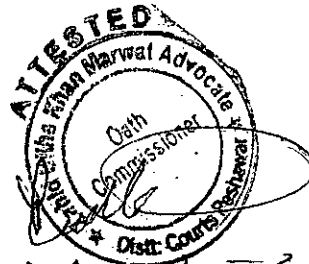
Government of KPK and others

**AFFIDAVIT:**

I, *Mir Nawaz S/o Nadir Khan, R/o Mohallah Khani Khel, Barki Jan Kor, P.O Jinnah Kor, Tehsil & District Qabali Illaqa Mulhiqa, Peshawar,* being petitioner and special attorney for other petitioners, do hereby solemnly affirm and declare on oath, that the contents of the Instant writ petition are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Court.

*Mir Nawaz*  
DEPONENT  
CNIC#: 17301-1346337-3  
Cell No: 0333-6366550

IDENTIFIED BY *Javed Iqbal Gulbela*  
JAVED IQBAL GULBELA  
Advocate Supreme Court  
Pakistan.





**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA**

**SERVICE TRIBUNAL**

CM # \_\_\_\_\_/2021

In

Service Appeal No. 332/2020

Mir Nawaz

**Versus**

Government of KPK and others,

**APPLICATION FOR EARLY FIXATION**

**OF THE CAPTIONED CASE**

**Respectfully Sheweth,**

1. That the captioned case is pending adjudication before this Hon'ble Court and is fixed for 22-03-2021.
2. That infact the post of Head Master at Govt. High School, Said Azam Killi, HSD, Peshawar has been vacated since 11-02-2021. It is important to note here that the applicant / appellant had already moved an application through the worthy District Education Officer Hassan Khel S/D Peshawar for transfer to the said post, whereby DEO Hassan Khel recommended the request of the appellant.

3. That the respondent department is going to fill up the vacant post in the up coming days.

4. That in the given circumstances of the case the early fixation of the case is indispensable.

It is, therefore, most humbly prayed that on acceptance of the instant application, the above title case may kindly be fixed for an earlier date.

Dated: 22-02-2021

Applicant / Appellant  
Through  
Counsel  
Javed Iqbal Gulbela  
Advocate, Supreme Court  
Pakistan.

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA**  
**SERVICE TRIBUNAL**

CM # \_\_\_\_\_/2021

In

Service Appeal No. 332/2020

Mir Nawaz

**Versus**

Government of KPK and others

**AFFIDAVIT:**

I, *Mir Nawaz S/o Nadir Khan, R/o Mohallah Khani Khel, Barki Jan Kor, P.O Jinnah Kor, Tehsil & District Qabali Illaqa Mulhiga, Peshawar,* being petitioner and special attorney for other petitioners, do hereby solemnly affirm and declare on oath, that the contents of the Instant writ petition are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Court.

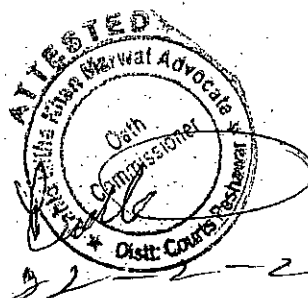
DEPONENT

CNIC#: 17301-1346337-3

Cell No: 0333-6366550

IDENTIFIED BY 

JAVED IQBAL GULBELA  
Advocate Supreme Court  
Pakistan.



**OFFICE OF THE DISTRICT EDUCATION OFFICER HASSAN KHEL S/D PESHAWAR**

No. \_\_\_\_\_ Dated \_\_\_\_\_/2021

To

The Addl. Director of Education,  
Newly Merged Districts Peshawar.

Subject:- **APPLICATION FOR TRANSFER.**

Enclosed please find herewith an application, submitted by Mr. Mir Nawaz I/C Principal GHS Kandi Zarin Khel HSD Peshawar, which is self explanatory, is forwarded with the remarks that the said one is an energetic and cooperative officer. He is need of our office, For, he has always been field worker in all problems of our office. Regardless overstatement, in fact the said officer is want of the department in the said locality. He always cooperates with the department in every matter. As far as, teaching learning processes of his institution is concerned, it has always got exemplary position in the locality & in spite of his health problems also, he was awarded with the best principal award last year. Now, as the HM post is going to be vacated, as written in the application and the undersigned is compelled by his services and attitude to recommend him for the post.

Therefore, it is strongly recommended and requested in your good honour to keep his services towards the department in eyes, his transfer case may please be considered sympathetically & favorably and his transfer be made to **GHS SAID AZAM KILLI HSD PESHAWAR**, as he wishes, in the best interest of public services please.

**DISTRICT EDUCATION OFFICER,  
HASSAN KHEL S/D PESHAWAR.**

To

The Addl. Director of Education,  
Newly Merged Districts Peshawar.

Through:-

Distric Education Officer,  
Hassan Khel S/D Peshawar.

**Subject:-**

**APPLICATION FOR TRANSFER.**

Respected Sir,

With due respect and humble submission I beg to state that the undersigned is working as Incharge principal (BPS-17) at GHS Kandi Zarin Khel HSD Peshawar. Sir, the applicant was promoted to HM at S.No. 87 of the ordert, Vide Secretary E&SED Peshawar Order No. SO(PE)/2-6/DPC Meeting (31.1.017), dated 30.05.2017 & adjusted as HM at GHS Musa Dara HSD Peshawar at S.No.29, Vide DE FATA, Order No. SO/EDU/SSD/FATA/5845-854, dated 16.06.2017. But on the request of the Incharge principal of the said school at that time, Fazal Karim, their mutual transfer was made in corrigendum, Vide DE FATA Notification order No. SO/Edu/SSD/FATA/6023-33, dated 25.07.2017 which was accepted by the applicant happily. But Sir, unfortunately after one and half year, the undersigned was transferred to GHS toot Qamar Khyber district, Vide Secretary E&SED Order No. SO(SM)E&SED2-1/2019/Posting/ Transfer/General, dated 12<sup>th</sup> February, 2019 and it was not only difficult but almost impossible for the undersigned to perform his services in so far flung area due to his **heart, diabetic and kidney problems.** So, the applicant appealed to Chief Secretary of KPK Peshawar for corrigendum on 01.03.2019, but in vain (Copy attached). Sir, after that the undersigned applied for transfer in his area against vacant HM post at GHS Faridi HSD Peshawar. (Copy attached), but once again he was discouraged by his superiors. Sir, then there was no other way with applicant except to go to the court and that was the reason that he had to go to the Peshawar High Court Peshawar. The honourable court asked him to approach the Service Tribunal against his transfer order, however, gave status quo in the meanwhile on 28.03.2019, Vide case No. PW 1633P/2019. Sir, as per direction of the honourable court, the applicant filed an application in the Service Tribunal where he was given status quo once again on the transfer order of the applicant which is still on the table of the Tribunal. (Both the copies attached). Sir, now the post of the HM is going to be vacated at **GHS Said Azam Killi HSD Peshawar on 12.02.2021** due to retirement of **Mr. Abdul Qayum HM of the school on 11.2.021** (Written Certificate from D.E.O concerned is attached). Sir, the undersigned is willing to withdraw his case from the Service Tribunal if he may be transferred there.

Therefore you are requested to look into the matter and keep the problems of the undersigned in eyes, **the services of the undersigned may please be transferred to the post of HM at GHS Said Azam Kili HSD Peshawar** in the interest of public services please.

Thanks a lot.

To

**The Additional Director Education  
Newly Merged Tribal District  
Khyber Pakhtun Khwa Peshawar**

**Subject:- APPEAL FOR CORRIGENDUM**

Memo:-

Enclosed please find herewith the original application submitted by Mr. Amir Nawaz I/C Principal GHS Kandi Zarin khel Hassan Khel sub Division Peshawar addressed to Chief Secretary Khyber Pakhtunkhwa Peshawar is sent for your further necessary action please.

**District Education officer  
Hassan khel Sub Division  
Peshawar.**

Endst; No. 6714 1

Copy for information to the:-

1. Mr. Amir Nawaz I/C Principal GHS Kandi zarin khel HSD Peshawar.

**District Education officer  
Hassan khel Sub Division  
Peshawar.**



**DIRECTORATE OF ELEMENTARY &  
SECONDARY EDUCATION KHYBER  
PAKHTUNKHWA**

PHONE: 091-9210229, 9210230  
9210437, 9210517, 9210440  
FAX: 091-9210924

NO. A/12 MR. MIR NAWAZ

/ DATED

15/3/19

To

The Secretary  
Elementary and Secondary Education  
Department Khyber Pakhtunkhwa, Peshawar.

Subject: Appeal for corrigendum.

I am directed to enclose herewith a copy of District Education Officer Sub Division Hassan Khel District Peshawar letter No. 6713 dated 28/2/2019 alongwith appeal in r/o Mr. Mir Nawaz Head Master GHS Kandi Zarin Khel Sub Division Hassan Khel District Peshawar on the subject cited above for further necessary action please.

Deputy Director (Estab)  
Merged Districts

Endst: No. 4082 /-

Copy to:

1. District Education Officer Sub Division Hassan Khel District Peshawar w/r to his letter No. 6713 dated 28/2/2019.

Deputy Director (Estab)  
Merged Districts

To

**The Chief Secretary,  
Khyber Pukhtun khawa Peshawar.**

**Subject:- APPEAL FOR CORRIGENDUM.**  
**Respected Sir,**

With due respect and humble submission I beg to request for sympathetic consideration please. Sir, the undersigned was promoted/adjusted at S.No.29 from SST post to HM at GHS Musa Dara FR. Peshawar, Vide Notification No.SO/EDU/SSD/FATA/5845-854, dated 16-06-2017 (copy attached Annexure-A), serving there only 03 months. Sir, then I was transferred to GHS Kandi Zarin Khel FR. Pesh. on the request of the public of community concerned to act there as in charge principal, Vide Corrigendum No.SO/EDU/ SSD/FATA/6023-33 , dated 25-07-2017 (Copy attached, Annexure- B) at S.No.17 and the undersigned proved their expectations true, performing his duty honestly and hardly. Sir, it is a great pleasure to say that along with my superiors, colleagues and students, the whole community is praising the services of the undersigned here in the school and it is a great reward for any Govt. servant. But inspire of these all, it is regretted that he was transferred from the said station, serving only 01 year, 06 months and 11 days to GHS Tood Qamar khyber district, hundreds mile away, with the Pak Afghan border, on plea of that the undersigned is working on wrong post (BPS-18) Vide No.SO (SM) E&SED/2-1/2019/ Posting/ Transfer/General, dt.12.2.2019 at S.No.12 (Copy attached, Annexure- C) while in the same order at S.Nos.6,7, 19, 141, 170 and 194 were transferred/adjusted on wrong posts which show injustice and political victimization with the servant. Sir, Advisor to CM for E&SED KPK also has written to Sec. E&SED on a paper and order copy for reinstate him at his previous station and your n/a please, but in vain. Sir, the undersigned is the heart and diabetic patient and it is very difficult for him to perform there his duty as performed in the past at his local station. Sir, at present also, a HM post is lying vacant at GHS Faridi Hassan Khel Sub Division Peshawar.

Therefore, it is requested in your good honor to look into difficulties and ailing health problems of the undersigned sympathetically and being a local and patient one, his transfer order may please be cancelled on humanitarian basis and the undersigned may please be reinstated at his previous station in the interest of community and students please OR he may please be transferred/adjusted at GHS Faridi Hassan Khel Sub Division Peshawar. I shall be grateful and thankful to you for this act of kindness and favour and will pray for your long life and future successes.

No. 1558 , Dated 14.02.2019.

  
7/14/2019  
Yours faithfully and obediently,

Mir Nawaz I/C Principal GHS  
Kandi Zarin Khel, Hassan Khel  
Sub Division Peshawar.



To

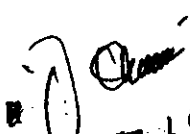
The Chief Secretary,  
Khyber Pukhtun khawa Peshawar.

Subject:- APPEAL FOR CORRIGENDUM.  
Respected Sir,

With due respect and humble submission I beg to request for sympathetic consideration please. Sir, the undersigned was promoted/adjusted at S.No.29 from SST post to HM at GHS Musa Dara FR. Peshawar, Vide Notification No.SO/EDU/SSD/FATA/5845-854, dated 16-06-2017 (copy attached Annexure-A), serving there only 03 months. Sir, then I was transferred to GHS Kandi Zarin Khel FR. Pesh. on the request of the public of community concerned to act there as in charge principal, Vide Corrigendum No.SO/EDU/SSD/FATA/6023-33, dated 25-07-2017 (Copy attached, Annexure- B) at S.No.17 and the undersigned proved their expectations true, performing his duty honestly and hardly. Sir, it is a great pleasure to say that along with my superiors, colleagues and students, the whole community is praising the services of the undersigned here in the school and it is a great reward for any Govt. servant. But in spite of these all, it is regretted that he was transferred from the said station, serving only 01 year, 06 months and 11 days to GHS Tood Qamar khyber district, hundreds mile away, with the Pak Afghan border, on plea of that the undersigned is working on wrong post. (BPS-18) Vide No.SO (SM) E&SED/2-1/2019/ Posting/ Transfer/General, dt.12.2.2019 at S.No.12 (Copy attached, Annexure- C) while in the same order at S.Nos.6,7, 19, 141, 170 and 194 were transferred/adjusted on wrong posts which show injustice and political victimization with the servant. Sir, Advisor to CM for E&SED KPK also has written to Sec. E&SED on a paper and order copy for reinstate him at his previous station and your n/a please, but in vain. Sir, the undersigned is the heart and diabetic patient and it is very difficult for him to perform there his duty as performed in the past at his local station. Sir, at present also, a HM post is lying vacant at GHS Faridi Hassan Khel Sub Division Peshawar.

Therefore, it is requested in your good honor to look into difficulties and ailing health problems of the undersigned sympathetically and being a local and patient one, his transfer order may please be cancelled on humanitarian basis and the undersigned may please be reinstated at his previous station in the interest of community and students please OR he may please be transferred/adjusted at GHS Faridi Hassan Khel Sub Division Peshawar. I shall be grateful and thankful to you for this act of kindness and favour and will pray for your long life and future successes.

No. 1558 , Dated 14.02.2019.

  
7-14/2/19  
Yours faithfully and obediently,

Mir Nawaz I/C Principal GHS  
Kandi Zarin Khel, Hassan Khel  
Sub Division Peshawar.

**BEFORE THE HON'BLE PESHAWAR HIGH  
COURT, PESHAWAR.**

In Re W.P. 16337 /2019

Mir Nawaz principal of Government High School  
Kandi Zarin Khel, Hassan Khel, Sub Division  
Peshawar.

*(Petitioner)*

**VERSUS**

1. Government of Khyber Pakhtunkhwa through  
Chief Secretary of Khyber Pakhtunkhwa at Civil  
Secretariat Peshawar.
2. Chief Secretary at Civil Secretariat Peshawar.
3. Secretary, Elementary and Secondary Education  
Department, Government of Khyber  
Pakhtunkhwa at Civil Secretariat Peshawar.
4. Director Elementary and Secondary Education  
Department, Government of Khyber  
Pakhtunkhwa at Civil Secretariat Peshawar.
5. District Education Officer District Khyber (Male).

...Respondents

**PETITION UNDER ARTICLE-199 OF  
CONSTITUTION OF THE ISLAMIC  
REPUBLIC OF PAKISTAN, 1973**

**Respectfully Sheweth;**

1. That the petitioner is a naturally born  
bonafide citizen of the Islamic Republic of  
Pakistan and hails from a respectable  
family of District khyber.

FILED TODAY  
Deputy Registrar

FORM 'A'  
FORM OF ORDER SHEET

Date of Order or Proceedings	ORDER OR PROCEEDINGS WITH SIGNATURE OF JUDGE/JUDGES
1	2
28.03.2019	<p><u>WP No.1633-P/2019.</u></p> <p><b>Present:</b> Petitioner in person. Mr. Rabnawaz Khan, AAG for respondents.</p> <p style="text-align: center;">***</p> <p><b><u>IKRAMULLAH KHAN,J:-</u></b> The petitioner stated at the bar that he is victim of political victimization and continuously he is under transfer without retaining him on the post in accordance with the Posting/Transfer Policy of the Provincial Government which reads as:</p> <p style="padding-left: 40px;">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.</p> <p>While a civil servant, feeling aggrieved due to immature transfer/posting may file an appeal or representation as the case may be in term of clause xiv of the Government Policy which reads as:</p> <p style="padding-left: 40px;">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.</p>

The option of appeal against posting/transfer orders could be exercised only in the following cases.

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

The petitioner has already submitted appeal/representation to the concerned authorities on 01.03.2019, which is still pending. The respondents were bound to dispose of the appeal/representation within the prescribed period provided under the rule i.e. 15 days. But the respondents did not decide the appeal/representation within the prescribed period, therefore, the petitioner may approach the Service Tribunal against his transfer order, however, in the meanwhile status quo be maintained.

  
JUDGE

JUDGE

\*Ayub\*

Hon'ble.Mr. Justice Ikramullah Khan & Hon'ble Justice Musarrat Hilali.



**DIRECTOR**  
**SECONDARY EDUCATION KHYBER**  
**PAKHTUNKHWA**

PHONE: 091-9210589, 9210528  
9210437, 9210457, 9210468  
FAX: 911-9210930

NO. 2136 / DATED 12/12  
A-12. GENERAL TRANSFERS.

To

The Secretary to Govt. of Khyber Pakhtunkhwa,  
Elementary & Secondary Education Department

Subject: **APPLICATION FOR TRANSFER.**

I am directed to enclose here with a copy of the letter No. 3472 dated 07-12-2020 along with an application in respect of Mr. Mir Nawaz Headmaster (BS-17) working against the post of Principal (BS-18) at GHS Kandi Zarin Khel Sub Division Hassan Khel Peshawar regarding his transfer against the vacant post of Headmaster (BS-17) at GHS Said Azam Killi Sub Division Hassan Khel on the subject cited above for your kind perusal and further necessary action please.

Encl: **As Above**

**DEPUTY DIRECTOR (ESTAB)**  
**MERGED DISTRICTS**

Endst No. \_\_\_\_\_ /

Copy to the:-


1. PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.

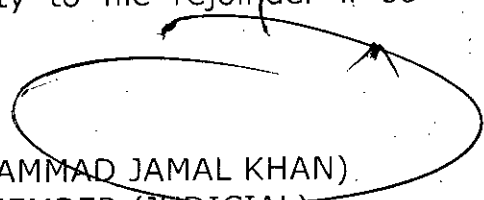
**DEPUTY DIRECTOR (ESTAB)**  
**MERGED DISTRICTS**

21.01.2021

Appellant is present alongwith his counsel Mr. Javed Iqbal Gulbela, Advocate. Mr. Riaz Ahmad Paindakheil, Assistant Advocate General and Mr. Muhammad Saleem, Section Officer (Litigation) for the respondents are also present.

Representative of respondents submitted written reply, the same be placed on file. Learned Assistant Advocate General made a request for adjournment for arguments. The request is allowed, the appeal is adjourned to 12.02.2021 for arguments before D.B. The appellant is at liberty to file rejoinder if so desired.

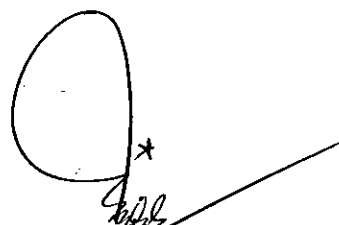
  
(ATIQ-UR-REHMAN WAZIR)  
MEMBER (EXECUTIVE)

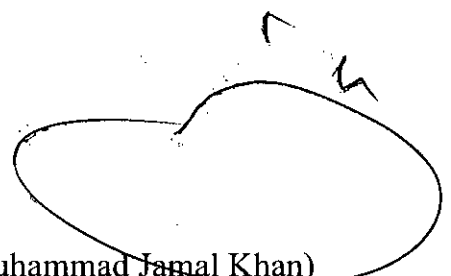
  
(MUHAMMAD JAMAL KHAN)  
MEMBER (JUDICIAL)

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 22.03.2021 for arguments before D.B.

  
(Mian Muhammad)  
Member (E)

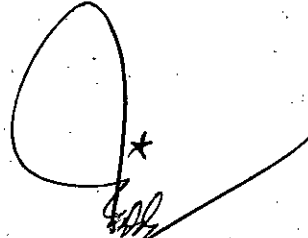
  
(Muhammad Jamal Khan)  
Member(J)

20.08.2020

None for the appellant present. Addl: AG for respondents present. Representative of the respondents are absent.

Written reply on behalf <sup>of</sup> respondents not submitted. Notices be issued to the respondents for submission of written reply/comments.

Adjourned to 02.10.2020 before S.B.

  
(Mian Muhammad)  
Member(E)

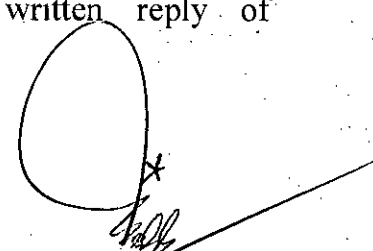
02.10.2020

Junior to counsel for the appellant is present.

Mr. Kabirullah, Khattak, Additional Advocate General for respondents present.

Written reply on behalf of respondents not submitted. Learned Addl: AG is directed to ensure presence of the representative and submit reply on the next date positively. Last chance is given to the respondents for reply /comments.

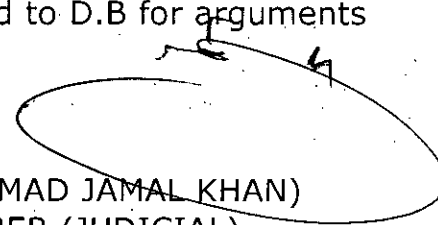
Adjourned to 25.11.2020 for written reply of respondent No.3 before S.B.

  
(Mian Muhammad)  
Member (E)

25.11.2020

Junior counsel for appellant is present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents is also present.


Written reply on behalf of respondents not submitted despite last chance given in the previous order sheet dated 02.10.2020, therefore, the appeal is posted to D.B for arguments for 21.01.2021.

  
(MUHAMMAD JAMAL KHAN)  
MEMBER (JUDICIAL)

27.02.2020

Counsel for the appellant present. Mr. Kabirullah Khattak, Addl. AG for respondent present.

Learned Addl. AG requests for time to contact the respondents and submit written reply/comments. Adjourned. To come up for written reply/comments on 07.04.2020 before S.B

  
(Hussain Shah)  
Member

07.04.2020

Due to public holiday on account of COVID-19, the case is adjourned to 30.06.2020 for the same. To come up for the same as before S.B.

  
Reader

30.06.2020

Junior to counsel for the appellant present.

Mr. Kabir Ullah Khattak learned Additional Advocate General for the respondents present.

Written reply on behalf of respondents is still awaited. Learned AAG requested for adjournment for submission of written reply/comments. Opportunity is granted. To come up for submission of written reply/comments on 20.08.2020 before S.B.

  
Member (J)



03.02.2020

Counsel for the appellant Mir Nawaz present. Preliminary arguments heard. It was contended by learned counsel for the appellant that the appellant was serving in Education Department as SST (BPS-17) at Government High School Kandi Zarin Khel. It was further contended that the appellant was transferred from Government High School Kandi Zarin Khel FR Peshawar to Government High School Toot Qamar Khyber vide order dated 12.02.2019. It was further contended that the appellant filed departmental appeal and also challenged the impugned order through Writ Petition in the worthy High Court. It was further contended that the worthy High Court disposed of the Writ Petition of the appellant vide judgment dated 28.03.2019 and also granted status-quo order in favour of the appellant. It was further contended that the departmental appeal has not been decided so far. It was further contended that after stipulated period, the appellant filed the present service appeal. It was further contended that the appellant has not relinquish the charge in Government High School Kandi Zarin Khel FR Peshawar as the worthy High Court granted status-quo order in his favour. It was further contended that no one has been transferred at the place of the appellant at Government High School Kandi Zarin Khel FR Peshawar. It was further contended that the respondent-department has transferred the appellant against the Transfer Posting Policy, therefore, the impugned order is illegal and liable to be set-aside.

The contention raised by the learned counsel for the appellant needs consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days, thereafter, notices be issued to the respondents for written reply/comments for 27.02.2020 before S.B. In the meanwhile, status-quo be maintained till the next date.

*M A*  
(MUHAMMAD AMIN KHAN KUNDI)  
MEMBER

Appellant Deposited  
Security & Process Fee



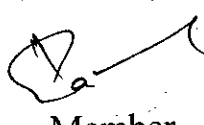
03/2/20

Form- A

# FORM OF ORDER SHEET

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

Case No.- 332/2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	13/01/2020	<p>The appeal of Mr. Mir Nawaz resubmitted today by Mr. Javed Iqbal Gulbella 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 13/01/2020</p>
2-	15/01/20	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>27/01/2020</u></p> <p style="text-align: right;"> CHAIRMAN</p>
	27.01.2020	<p>Appellant absent. Learned counsel for the appellant absent. Due to general strike of the bar, on call of Khyber Pakhtunkhwa Bar Council, the case is adjourned. To come up for preliminary hearing on 03.02.2020 before S.B.</p> <p style="text-align: right;"> Member</p>

The appeal of Mr. Mir Nawaz principal of Government High School Kandi Zarin Khel Hassan Khel, Sub Division Peshawar received today i.e. on 10.01.2020 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

Copy of order/judgment of Peshawar High Court Peshawar mentioned in para-7 of the memo of appeal is not attached with the appeal which may be placed on it.

No. 56 /S.T,

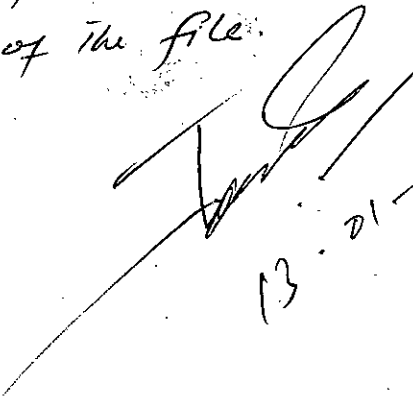
Dt. 13-1- /2020.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Javed Iqbal Gulbella Adv. Pesh.

Respected sir:

Resubmitted after completion  
The copy of order/judgment of Peshawar  
High Court Peshawar is available on page  
NO: 31-B of the file.

  
13-01-2020  
Javed Iqbal Gulbella  
Advocate.

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA  
SERVICES TRIBUNAL PESHAWAR**

In Re S.A 337 /2020

Mir Nawaz

**VERSUS**

Government of KPK & Other

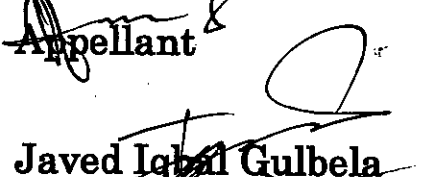
**INDEX**

<i>S#</i>	<i>Description of Documents</i>	<i>Annex</i>	<i>Pages</i>
1.	Grounds of Appeal with affidavit		1-8
2.	Affidavit.		9
3.	Addresses of Parties.		10
4.	Copy of notification No. SO/Edu/SSD/FATA/5845-854 Dated 16, June 2017	"A"	11-12
5.	Copy of Corrigendum No. SO/Edu/SSD/FATA/6023-033 Dated 25, July 2017	"B"	13
6.	Copy of impugned Notification No. SO/(SM) E&SED/2-1/2019/Posting/Transfer/General dated 12/02/2019	"C"	14-21
7.	Copy of writ petition	"D"	22-29
8.	Other Documents	"E"	30-31A.3/3
9.	Wakalatnama		

Dated: 09/01/2020

  
Appellant

Through

  
Javed Iqbal Gulbela  
&  
Saghir Iqbal Gulbela  
Advocates, High Court  
Peshawar

Off Add: 9-10A Al-Nimrah Centre, Govt College Chowk Peshawar

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA  
SERVICES TRIBUNAL PESHAWAR**

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 301

Dated 10-1-2020

In Re S.A 332 /2020

Mir Nawaz principal of Government High School  
Kandi Zarin Khel, Hassan Khel, Sub Division  
Peshawar.

*(Appellant)*

**VERSUS**

1. Government of Khyber Pakhtunkhwa through  
Chief Secretary of Khyber Pakhtunkhwa at Civil  
Secretariat Peshawar.
2. Chief Secretary at Civil Secretariat Peshawar.
3. Secretary Elementary and Secondary Education  
Department, Government of Khyber  
Pakhtunkhwa at Civil Secretariat Peshawar.
4. Director Elementary and Secondary Education  
Department, Government of Khyber  
Pakhtunkhwa at Civil Secretariat Peshawar.
5. District Education Officer (Male) District Khyber.

...Respondents

Filed to-day

*[Signature]*  
Registrar

10/1/2020

Re-submitted to -day  
and filed.

*[Signature]*  
Registrar

13/01/2020

**APPEAL U/S 4 OF THE KHYBER  
PAKHTUNKHWA SERVICES  
TRIBUNAL ACT 1974 AGAINST THE  
IMPUGNED TRANSFER  
NOTIFICATION NO: SO/(SM) E &  
SED/2-1/2019/ POSTING/ TRANSFER/  
GENERAL DATED 12/02/2019 OF THE  
OFFICE OF SECRETARY  
ELEMENTARY & SECONDARY  
EDUCATION, KHYBER  
PAKHTUNKHWA WHEREBY THE  
APPELLANT HAS ILLEGALLY BEEN  
TRANSFERED & DEPARTMENTAL  
APPEAL AGAINST THE SAME WENT  
FUTILE.**

(2)

**Respectfully Sheweth:**

1. That the Appellant is a naturally born bonafide citizen of the Islamic Republic of Pakistan and hails from a respectable family of District Khyber.
2. That in fact the Appellant is an SST (BPS-17) in Elementary and Secondary Education Department Government of Khyber Pakhtunkhwa.
3. That in fact the Appellant was promoted and transfer from SST to the post of head Master (BPS-17) against the vacant post of Head Master Government High School Musa Dara FR Peshawar (BPS-18) on his own pay and scale vide notification No. SO/Edu/SSD/FATA/5845-854 Dated 16, June 2017 in the public interest. **(Copy of notification No. SO/Edu/SSD/FATA/5845-854 Dated 16, June 2017 is annexed as annexure "A")**
4. That it is pertinent to mentioned here, that the Appellant served at Government High School Musa Dara, FR Peshawar just for 3 months and then transferred to the post of "incharge principal (BPS-18) Kandi Zarin Khel FR Peshawar" in the public interest in his own pay and scale vide corrigendum

No. SO/Edu/SSD/FATA/6023-033 Dated 25, July 2017. (Copy of Corrigendum No. SO/Edu/SSD/FATA/6023-033 Dated 25, July 2017 is annexed as annexure "B")

5. That it was in this back drop that the impugned notification No.SO/(SM) E&SED/2-1/2019/Posting/Transfer/General dated 12/02/2019 was issued, whereby the Appellant was once again transferred from Government High School Kandi Zarin Khel FR Peshawar to Government High School Toot Qamar District Khyber as Head master BPS-17. It is pertinent to mention here that this impugned notification of transfer had been issued after the Appellant had served just for one year and 3 months. (Copy of impugned Notification No. SO/(SM) E&SED/2-1/2019/Posting/Transfer/General dated 12/02/2019 is annexed as annexure "C")

6. That the Appellant has already moved an application for corrigendum of the impugned transferred order to the extent of deletion of name of the Appellant, which order is not only pre-mature but as well as a political motivated one, rather is also against the principle of equality as detailed in article "4" and "25" of the constitution.

(4)

7. That this Hon'ble Tribunal was defunctional at the time of impugned notification, therefore the petitioner moved writ petition before the August Peshawar High Court Peshawar for redressal of his grievance, the August Peshawar High Court Peshawar suspended the impugned notification No: SO/(SM) E&SED/2-1/2019/Posting/Transfer/General dated 12/02/2019 and send the writ petition to the Elementary & Secondary Education Department Khyber Pakhtunkhwa with directions to consider the writ petition as a departmental appeal and decide the same according to law but inspite of lapse of statutory period, the respondent did not decide the departmental appeal, hence the instant appeal. **(Copy of writ petition and orders are annexed as annexure "D & E" respectively).**

8. That being a persistent transferred order and politically motivated one, hence the instant service appeal on the following grounds inter alia:-



**Grounds:**

5

- A. That the Appellant is a the naturally born bonafide citizen of the Islamic Republic of Pakistan and are fully and equally, on equality basis, entitled to all basic and fundamental rights as enshrined in the fundamental law of the land, interpreted, guaranteed and enforced by the laws of the land and discrimination alongwith unfettered exercise of discriminatory powers by an authority or office is always been deplored, deprecated and depreciated by superior Courts of the land.
- B. That the impugned transfer order is void ab-initio, illegal, unlawful, corum non judice and is liable to be cancelled to the extent of Appellant.
- C. That the impugned transfer order is certainly a politically motivated transfer order, which rendered the very impugned transfer order as void and against the well established law.
- D. That the normal tenure of transfer for any posting is 03 years, while the Appellant has served just for round about one year and three months at Government High School

Kandi Zarin khel FR Peshawar whereafter Appellant was transferred to Government High School Toot Qamar District Khyber, which is a glaring and bold violation of transfer and posting policy of Government of Khyber Pakhtunkhwa and is a nullity in the eyes of law.

E. That besides above, the very impugned transfer order is malicious on its very surface for the reason that in the impugned notification at serial No.6, 7, 19, 141, 170, and at serial No.194, the Head Master of BPS-17 and 18 were transferred to the post of principal of higher payscale BPS-18/19 on their own pay and scale where as the Appellant was transferred and posted as i.e. SST (BPS-17), which is clear discrimination under the constitution of Islamic Republic of Pakistan 1973, and on this score alone the impugned notification is liable to be turned down and cancelled in the best interest of law.

F. That the Appellant performed his duty with honesty and due to his pure devotion the people of the locality of Kandi Zarin Khel, praised the services of the Appellant at Government High School Zarin Khel and the impugned notification will not only effected

the rights of the Appellant but as well as affect the people of the Kandi Zarin Khel FR Peshawar, because they will loss honest and devoted teacher from their School, hence the impugned notification is illegal, unlawful void ab-initio and be cancelled in the best interest of justice.

G. That since inducting into service, the performance of the Appellant has remained excellent and there exists no complaint, what so ever, moved against the Appellant and the same is reflected from his ACR's and different certificates.

H. That the Appellant is heart cardiac and diabetic patient and it is very difficult for him to perform his duties at far flung area i.e. Toot Qamar District Khyber near Afghan/Pak border, hence the impugned transferred notification be cancelled in the best interest of justice.

I. That from every corner, the impugned transfer order is illegal, void, and the same is liable to be set aside.

J. That any other ground not raised here may graciously be allowed to be raised at the time of arguments.

8

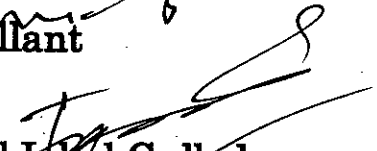
*It is, therefore, most humbly prayed that on acceptance of the instant appeal, the impugned transfer Notification No. SO/(SM) E&SED/2-1/2019/Posting/Transfer/General dated 12/02/2019 of the office of the Secretary Elementary and secondary education department Khyber Pakhtunkhwa, may very graciously be declared as void and illegal and be set aside and cancelled just to the extent of Appellant and by doing so, the Appellant be allowed to serve at his own place of posting i.e. principal (BS-18) Government High School Kandi Zarin Khel FR Peshawar in his own pay and scale, in the best interest of justice.*

*Any other relief not specifically asked for may also graciously be extended in favour of the Appellants in the circumstances of the case.*

Dated: 09/01/2020

  
Appellant

Through

  
Javed Iqbal Gulbela  
&  
Saghir Iqbal Gulbela  
Advocates, High Court  
Peshawar

**NOTE:-**

No such like appeal for the same appellant upon the same subject matter has earlier been filed by me before this Hon'ble Tribunal.

  
Advocate.

9

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA**  
**SERVICES TRIBUNAL PESHAWAR**

In Re S.A \_\_\_\_\_/2020

Mir Nawaz

**VERSUS**

Government of KPK & Other

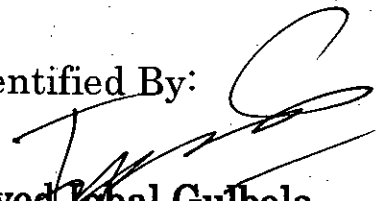
**AFFIDAVIT**

I, Mir Nawaz principal of Government High School Kandi Zarin Khel, Hassan Khel, Sub Division Peshawar, do hereby solemnly affirm and declare that all the contents of the accompanied **appeal** is true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Tribunal.

  
**DEPONENT**

**CNIC:**

Identified By:

  
**Javed Iqbal Gulbela**  
Advocate High Court  
Peshawar.

(10)

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA  
SERVICES TRIBUNAL PESHAWAR**

In Re S.A \_\_\_\_\_/2020

Mir Nawaz

**VERSUS**

Government of KPK & Other

**ADDRESSES OF PARTIES**

**APPELLANT.**

Mir Nawaz principal of Government High School Kandi  
Zarin Khel, Hassan Khel, Sub Division Peshawar

**RESPONDENTS:**

1. Government of Khyber Pakhtunkhwa through Chief Secretary of Khyber Pakhtunkhwa at Civil Secretariat Peshawar.
2. Chief Secretary at Civil Secretariat Peshawar.
3. Secretary Elementary and Secondary Education Department, Government of Khyber Pakhtunkhwa at Civil Secretariat Peshawar.
4. Director Elementary and Secondary Education Department, Government of Khyber Pakhtunkhwa at Civil Secretariat Peshawar.
5. District Education Officer District Khyber (Male).

Dated: 09/01/2020

  
**Appellant**

Through

  
**Javed Iqbal Gulbela**

&

**Saghir Iqbal Gulbela**  
Advocates, High Court  
Peshawar



Annexure - A of order  
11/01/17

**FATA SECRETARIAT**  
(SOCIAL SECTORS DEPARTMENT)  
WARSAK ROAD PESHAWAR  
Dated Peshawar the June 16, 2017

Annexure - A

**NOTIFICATION**

No. SO/Edu/SSD/FATA/ 5845-859 Consequent upon placement of their services at the disposal of Directorate of Education FATA vide Govt. of Khyber Pakhtunkhwa, Elementary & Secondary Education Department Notification No. SO(PE)/2-6/DPC Meeting (31-01-2017) dated 30-05-2017 and with approval of the Competent Authority, the following SSTs promoted to the post of Head Master (BS-17) are hereby adjusted against the vacant post in the relevant scales & posts in the schools / offices mentioned against their names below w.e.f. 30-05-2017 in the interest of public service, while the terms & conditions will remain the same as notified in the mentioned notification.

S#	Name with Designation	Present Place of Posting	Adjusted as Headmaster	Remarks
1	Saeed Ahmed SST	GHS Dherakai Bajaur	GHS Dherakai Bajaur Agency	AVP
2	Said Ur Rehman SST	AAEO Office of AEO Bajaur	GHS Khar No.2 Bajaur	AVP
3	Muhammad Madain SST	AAEO Office of the AEO Bajaur Agency	GHS Painsa Khel Bajaur	AVP
4	Ikhtiyar Jan SST	GHS Top Mandal Bajaur	GHS Kama Darra Bajaur	AVP
5	Rahmat Gul SST	GHS Ghazi Baba Bajaur	GHS Bar Saparay Bajaur	AVP
6	Jaffar Shah ST	GHS Raghagan Bajaur	GHS Shingar Gul Bajaur	AVP
7	Noor Hamid SST	working as I/C HM GHS Ghani Addai Bajaur	GHS Ghani Adai Bajaur	AVP
8	Bad Shah Muhammad SST	GHS Inayat Killa Bajaur	Repatriated to E&SE Deptt KPK	Due to non-availability of H/M post
9	Aziz Ur Rehman SST	GHS Sahib Abad Bajaur	Repatriated to E&SE Deptt KPK	Due to non-availability of H/M post
10	Noor Khan SST	GHS Zarwam F.R Bannu	GHS Dran Sheikhan Orakzai	AVP
11	Qamar Zaman SST	GHS Chapari FR Bannu	GHS Manz Garhi Orakzai	AVP
12	Waheed Ullah SST	GHS Bakka Kel F.R Bannu	GHS Daradar Mamozai Orakzai	AVP
13	Gul Azam SST	GHS Habib Ullah FR Banu	Repatriated to E&SE Deptt KPK	Due to non-availability of H/M post
14	Noor Muhammad SST	GHS Habib Ullah FR Bannu	Repatriated to E&SE Deptt KPK	Due to non-availability of H/M post
15	Taleh Muhammad SST	GHS Barganaroo FR Bannu	Repatriated to E&SE Deptt KPK	Due to non-availability of H/M post

JAVED IQBAL Gul Bala Daudzai Law Chamber Advocate High Court Peshawar Mob: 0345-9405501

JAVED IQBAL Gul Bala Daudzai Law Chamber Advocate High Court Peshawar Mob: 0345-9405501

11-A

16	Abdul Salam SST	GMS Khanam Ali Khel FR Bannu	GHS Chappar Mishti Orakzai	AVP
17	Bakht Rawan SST	GHS Pir Tangi FR tank	Repatriated to E&SE Deptt KPK	Due to non-availability of H/M post
18	Abdus Subhan SST	GHS Ali Khel NWA	Repatriated to E&SE Deptt KPK	Due to non-availability of H/M post
19	Rajab Ali SST	GHSS Nadar Bodin Khel FR Bannu	GHS And Khel Orakzai	AVP
20	Mr. Baitullah SST	GHS Turki ismail Khel FR Kohat now working at I/C H/M Kochi Kurram	Repatriated to E&SE Deptt KPK	Due to non-availability of H/M post
21	Rahmatullah SST	GHS Darazinda FR Di Khan	Repatriated to E&SE Deptt KPK	Due to non-availability of H/M post on his own request
22	Jamshid Khan SST	GMS Kohi Pekar FR, DIK	GHS Pir Tangi	AVP
23	Abdur Rauf SST	GHS Merga F.R DIK	GHS Ghundi Sheikhan FR Tank	Vice S.No.91
24	Muhammad Iqbal SST	GHS Shpatkiwal FR Kohat	GHS Palosi Orakzai	AVP
25	Nasir Khan SST	GHS Sheraki F.R Kohat	GHS Saifal Darra Orakzai	AVP
26	Hassan Habib Afridi SST	GHS Sheraki FR Kohat	GHS Avi Mela Orakzai	AVP
27	Gul Salam SST	GHS Sheraki F.R Kohat	GHS Toor Chappar FR Kohat	Vice S.No.101
28	Umer Farooq SST	GHS Ara Khel FR Kohat	GHS Turki Ismail Khel FR Kohat	Vice S.No.100
29	Mir Nawaz Khan SST	GHS Kandi Zarin Khel FR Pesh	GHS Musa Darra FR Peshawar	Vice S.No.97
30	Eid Gul SST	GHS Musa Dara FR Peshawar	GHS Faridi FR Peshawar	Vice S.No.96
31	Abdul Qayum SST	GHS Janakor, FR Pesh	GHS Said Azam FR Pesh	Vice S.No.99
32	Muhammad Zahid SST	GHS Hasham Abad Khyber	GHS Kohi Sher Haidar Khyber	Vice S.No.103
33	Waris Khan SST	GCET(M) Jamrud Khyber	GHS Ghundi Khyber	AVP
34	Muhammad Riaz SST	GHSS Jamrud Khyber	GHS Badshah Mir Killi Khyber	AVP
35	Bahadur Nawaz SST	GHS.No.2 Jamrud Khyber Agency	GHS Durma Kor Khyber	AVP
36	Ahmed Jan SST	GHS Jan Khan Killi Khyber Agency	GHS Mad Ghali Attari Khyber	AVP
37	Sabir Muhammad SST	GMS Gul Miran Khyber Agency	GHS Akhoon Talab Khyber Agency	AVP



Better Copy No.11

**FATA SECRETARIAT**  
**(Social Sectors Department)**  
**Warsak Road Peshawar**

Dated Peshawar the June 16, 2017

**Notification:-**

No.SO/Edu/SSD/FATA/5845-854 Consequent upon placement of their service at the disposal of directorate of Education FATA vide Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department Notification NO. SO(PE)/2-6/DPC meeting (31/01/2017) dated 30/05/2017 and with approval of the competent Authority, the following SSTs promoted to the post to Head Master (BS-17) are hereby adjusted against the vacant post in the relevant scales and posts in the Schools/offices mentioned against their names below w.e.f 30/05/2017 in the interest of public service, while the terms and conditions will remain the same as notified in the mentioned notification.

S. No	Name with designation	Present place of posting	Adjusted as Headmaster	Remarks
1.	Saeed Ahmad SST	GHS Dheraki Bajaur	GHS Dherakai Bajaur Agency	AVP
2.	Said Ur Rehman SSSt	AAEO Office of AEO Bajaur Agency	GHS Khar No.2 Bajaur	AVP
3.	Muhamamd Maidan SST	AAEO office of the AEO Bajaur Agency	GHS Painsa Khel Bajaur	AVP
4.	Ikhtiyar Jan SST	GHS Top Mandal Bajaur	GHS Kama Darra Bajaur	AVP
5.	Rahmat Gul SST	GHS Ghazi Baba Bajaur	GHS Bar Separay Bajaur	AVP
6.	Jaffar Shah ST	GHS Raghagn Bajaur	GHS Shingar Gul Bajaur	AVP
7.	Noor Hamid SST	Working as I/C HM GHS Ghani Addai Bajaur	GHS Ghani Adai Bajaur	AVP
8.	Bad Shah SST	GHS Inayat Killa Bajaur	Repatriated to E & SE Department KP	Due to non-availability of H/M post
9.	Aziz Ur Rehman SST	GHS Sahib Abad Bajaur	Repatriated to E & SE Deptt Kp	Due to non-availability of H/M post
10.	Noor khan SST	GHS Zarwam F.R Bannu	GHS Dran Sheikhan Orakzai	AVP
11.	Qamar Zaman SST	GHS Chapari FR Bannu	GHS Manz Garhi Orakzai	AVP
12.	Waheed Ullah SSSt	GHS Bakka Kel F.R Bannu	GHS Daradr Mamozai Orakzai	AVP
13.	Gul Azam SST	GHS Habib Ullah FR Bannu	Repatriated to E & SE Deptt Kp	Due to non-availability of H/M post
14.	Noor Ahmad SST	GHS Habib Ullah FR Bannu	Repatriated To E&SE Deptt Kp	Due to non-availability of H/M post
15.	Taleh Muhammad SST	GHS Barganattoo FR Bannu	Repatriated To E&SE Dept Kp	Due to non-availability of H/M post

**JAVED IQBAL** Gul Bela  
Daudzai Law Chamber  
Advocate High Court Peshawar  
Mob: 0345-9405501

Better Copy No. 11/A

S. No	Name with designation	Present place of posting	Adjusted as Headmaster	Remarks
16.	Abdul Salam SST	GHS Khanam Ali Khel FR Bannu	GHS Chappar Mishti Orakzai	AVP
17.	Bakht Rawan SST	GHS Pri Tangi FR Tank	Repatriated to E & SE Deptt Khyber Pakhtunkhwa	Due to non-availability of H/M post
18.	Abdus Subhan SST	GHS Ali Khel NWA	Repatriated to E & SE Deptt Khyber Pakhtunkhwa	Due to non-availability of H/M post
19.	Rajab Ali SST	GHSS Nadar Bodin Khel FR Bannu	GHS And Khel Orakzai	AVP
20.	Mr. Baitullah SST	GHS Turki Ismail Khel FR Kohat now working at I/C H/M Kochi Kurram	Repatriated to E & SE Deptt Khyber Pakhtunkhwa	Due to non-availability of H/M post
21.	Rahmatullah SST	GHS Darazinda FR DI Khan	Repatriated to E & SE Deptt Khyber Pakhtunkhwa	Due to non-availability of H/M post
22.	Jamshid Khan SST	GMS Kohi Pewar FR DIK	GHS Pir Tangi	AVP
23.	Abdur Rauf SST	GHS Morga F.R DIK	GHS Ghundi Sheikhan FR Tank	Vice S. No. 91
24.	Muhammad Iqbal SST	GHS Shoalkiwal FR Kohat	GHS Palosai Orakzai	AVP
25.	Nasir Khan SST	GHS Sheraikei F.R Kohat	GHS Saifal Darra Orakzai	AVP
26.	Hassan Habib Afridi SST	GHS Sherikai FR Kohat	GHS Avi Mela Orakzai	AVP
27.	Gul Salam SST	GHS Sherikai F.R Kohat	GHS Toor Chappar FR Kohat	Vice S. No. 101
28.	Umer Farooq SST	GHS Ara Khel FR Kohat	GHS Turki Ismail Khel FR Kohat	Vice S. No. 100
29.	Mir Nawaz Khan SST	GHS Kandi Zarin Khel FR Peshawar	GHS Musa Darra FR Peshawar	Vice S. No. 97
30.	Eid Gul SST	GHS Musa Dara FR Kohat	GHS Faridi FR Peshawar	Vice S. No. 96
31.	Abdul Qayum SST	GHS Janakor, FR Peshawar	GHS Said Azam FR Peshawar	Vice S. No. 99
32.	Muhammad Zahid SST	GHS Hasham Abad Khyber	GHS Kohi Sher Haider Khyber	Vice S. No. 103
33.	Waris Khan SST	DCET (M) Jamrud Khyber	GHS Ghundi Khyber	AVP
34.	Muhammad Riaz SST	GHSS Jamrud Khyber	GHS Badshah Mir Killi Khyber	AVP
35.	Bahadr Nawaz SST	GHS No.2 Jamrud Khyber Agency	GHS Durma Kor Khyber.	AVP
36.	Ahmed Jan SST	GHS Jan Khan Killi Khyber Agency	GHS Mad Ghali Attari Khyber	AVP
37.	Sabir Muhammad SST	GMS Gul Miran Khyber Agency	GHS Akhoon Talab Khyber Agency	AVP

**JAVED IOBAL** Gul Bela  
Daudzai Law Chamber  
Advocate High Court Peshawar  
Mob: 0345-9405601

12

38	Khalil Ur Rehman SST	AAEO AEO Office Khyber Agency	GHS Lot Shalman Khyber	AVP
39	Sardar Khan SST	GHS Sama Garhi Khyber Agency	GHS Sama Garhi Khyber	Against Vacant BS-18 post
40	Haq Nawaz SST	GMS Tar Khel Khyber Agency	GHS Mian Morcha Khyber	AVP
41	Nawab Gul SST	GMS. Spin Qabar Khyber Agency	GHS Tood Kamar Khyber	AVP
42	Raees Khan SST	GHS Shah Ibrahim Kurram	GHS Shah Ibrahim Kurram	AVP
43	Sayed Mutahar Hussain SST	GMS Yousaf Khel Kurram	GHS Kunj Alizai Kurram	AVP
44	Ashraf Ali SST	AAEO Office of AEO Kurram	GHS Bushera Kurram	AVP
45	Kamal Hussain SST	AAEO Office of the AEO Kurram	GHS Pesar Kurram	AVP
46	Rahmatullah Jan SST	GMS Khanano Kallay (Pir Qayum) Kurram	GHS Kochi Kurram	Vice S.No.21
47	Aman Ali SST	GHS Zeran Kurram	GHS Bughdi Kurram	Against vacant post and his promotion will be considered from the date of DPC i.e. 31.1.2017 in the light of Estab Deptt instruction SO (R.VI)E& AD 1-16/2005 DATED 22.3.2006
48	Mislah Ud Din SST	GHS Ghuz Garhi Kurram	GHS Ghuz Garhi Kurram	AVP
49	Muzafar Hussain SST	GHSS Shalozan Kurram	GHS Shingak Kurram	Against vacant post and his promotion will be considered from the date of DPC i.e. 31.1.2017 in the light of Estab Deptt instruction SO (R.VI)E& AD 1-16/2005 DATED 22.3.2006
50	Syed Nawab Hussain SST	GHS Mahoora Kurram	GHS Angori Kurram	AVP
51	Imran Ali SST	GMHS Parachinar Kurram	GHS Manato Kurram	AVP
52	Mushtaq Hussain SST	GMS Nadeem Shaheed Higher Secondary School Shalozan Kurram	GHS Burki Kurram	AVP
53	Munir Hussain SST	GMHS Parachinar Kurram	GHS Bughdi Kurram	AVP
54	Iqbal Hussain SST/ AAEO	AAEO Office of AEO Kurram Agency	GHS Shingak Kurram	AVP

**JAVED IQBAL Gul Bela**  
Daudzai Law Chamber  
Advocate High Court Peshawar  
Mob: 0345-9405501

**JAVED IQBAL Gul Bela**  
Daudzai Law Chamber  
Advocate High Court Peshawar  
Mob: 0345-9405501

(2.A)

94	Raza Muhammad HM BS-17	GHS Ganra Haibat Khel SWA	I/C Pri: GHS Ladha SWA	Against vacant BS-19 post on his own pay & scale
95	Sher Habib HM BS-17	GHS Azam Warsak SWA	V.Pri: GHSS Shahoor SWA	Against vacant BS-18 post on his own pay & scale
96	Lal Gul HM BS-17	GHS Faridi FR Peshawar	I/C Pri: GHS Kandaw FR Peshawar	Against vacant BS-18 post on his own pay & scale
97	Naik Amir HM BS-17	GHS Musa Darra FR Peshawar	I/C Pri: GHS Bora No.1 FR Peshawar	Against vacant BS-18 post on his own pay & scale
98	Haq Mali HM BS-17	GHS Mian Morcha Khyber	GHS Datta Khel NWA	Against vacant BS-18 post on his own pay & scale
99	Taj Muhammad HM BS-17	GHS Said Azam FR Peshawar	I/C GHS Shamshatoo, FR Peshawar	AVP in his own pay & scale
100	Azizullah HM BS-17	GHS Turki Ismail Khel FR Kohat	I/C Pri: GHS Paya FR Kohat	Against vacant BS-18 post on his own pay & scale
101	Dil Nawaz HM BS-17	GHS Toor Chappar FR Kohat	I/C Pri: GHS Darra Adam Khel FR Kohat	Against vacant BS-19 post on his own pay & scale
102	Sajidur Rahman SS, BS-17	Assistant Director (SNE)	GHSS Sama Bacabera FR Peshawar	Against vacant ss Islamiyat post
103	Ahmad Ali Shah HM BS-17	GHS Kohi Sher Haidar Khyber	GHS Kohi Sher Haidar Khyber	Against vacant BS-18 post on his own pay & scale
104	Muhammad Hussain HM BS-17	GHS Land NWA	GHS Dossai NWA	Against vacant BS-19 post on his own pay & scale

Secretary Social Sectors Department FATA

Copy of the above is forwarded to the:

1. Secretary Elementary & Secondary Education Khyber Pakhtunkhwa.
2. Secretary Social Sectors Department FATA.
3. AGPR (Sub Office) Peshawar.
4. Director Elementary & Secondary Education Khyber Pakhtunkhwa.
5. Director Education FATA.
6. Agency Education Officers concerned.
7. Agency / District Accounts Officers Concerned.
8. Principals / Head Masters concerned.
9. Officers Concerned.

Deputy Secretary Education



Ats No 87  
13

Annexure - B

**FATA SECRETARIAT**  
**(SOCIAL SECTORS DEPARTMENT)**  
**WARSAK ROAD PESHAWAR**  
Dated Peshawar the July 25, 2017

Corrigendum

No. SO/Edu/SSD/FATA/6023-033 In partial modification of this office notification No. SO/Edu/SSD/FATA/845-854 dated 16/06/2017 and with other consequential transfer / postings, the following adjustment / postings are hereby ordered in the interest of public service.

S.No	Name with designation & present place of posting.	Posted/Adjusted as	Remarks
1	Mr. Ghohar Khan V/P (BS-18) GHSS Jamrud Khyber Agency.	Incharge Principal (BS-19) at GHS No.2 Jamrud Khyber Agency.	AVP (B-19) post in his own pay & scale
2	Mr. Saleem Khan, Principal (BS-18) GHS Jan Khan Killi Khyber Agency.	Principal (BS-18) at GHS Shagai Jamrud Khyber Agency.	Vice S.No.5
3	Mr. Nawab Gul H/M (BS-17) Tood Kamar Khyber Agency.	Incharge Principal (BS-18) at GHS Jan Khan Killi Khyber Agency.	Vice S.No.2 against the post of (BS-18) in his own pay & Scale.
4	Mr. Haq Mali H/M (BS-17) GHS Marha under order of transfer to GHS Datta Khel NWA	Head Master GHS Tood Kamar Landi Kota Khyber Agency.	Vice S.No.3
5	Mr. Mir Sardar Principal (BS-18) GHS shagai Khyber Agency.	Subject Specialist (BS-18) GCET Jamrud Khyber Agency.	Vice S.No.6
6	Mr. Fazli Wahab Subject Specialist Chemistry GCET Khyber Agency.	Vice principal (BS-18) at GHSS Jamrud Khyber Agency.	Vice S.No.1 in his own pay & scale.
7	Mr. Inayat Ali Principal (BS-18) GHS Mahoora Kurram Agency.	Incharge Principal (BS-19) at GHS Shalozan Kurram Agency.	Against vacant Principal (BS-19) in his own Pay & Scale.
8	Mr. Imran Ali H/M (BS-17) Under order of adjustment at GHS Manato Kurram Agency.	Incharge Principal (BS-18) at GHS Mahoora Kurram Agency	Vice S.No.7 against (BS-18) POST in his own pay & scale.
9	Mr. Munir Hussain H/M (BS-17) under adjustment of at GHS Bughdi Kurram Agency.	Head Master at GHS Manato Kurram Agency.	Vice S.No.8
10	Mr. Mir Sade Khan H/M (BS-17) under repatriation to E&SE KPK vide SO Education notification No. 5845-854 dated 16/06/2017.	Head Master at GHS Spaidar Orakzai Agency	Vice S.No.11
11	Mr. Zia Ul Haq H/M (BS-17) GHS Spaidar Orakzai Agency.	Incharge Principal at GHS Datta Khel NWA.	Against vacant Principal (BS-18) Post in his own pay & scale.
12	Mr. Misal Khan H/M (BS-17) GHS Sandu Khel Mohmand Agency.	Incharge Principal (BS-19) at GHS Haji Yar Jan Killi Mohmand Agency	Vice S.No.13 in his own pay and scale.
13	Mr. Laiq Jan H/M (BS-17) GHS Haji Yar Jan Mohmand Agency.	Head Master at GHS Sandu Khel Mohmand Agency.	Vice S.No. 12
14	Mr. Saifulah Principal (BS-18) GHS Barganaroo FR Bannu.	Principal (BS-18) at GHS Ghazi Killa FR Bannu.	Vice S.No 15

Page 1 of 2  
**JAVED IQBAL Gul Bela**  
Daudzai Law Chamber  
Advocate High Court Peshawar  
Mob: 0345-9405501

**JAVED IQBAL Gul Bela**  
Daudzai Law Chamber  
Advocate High Court Peshawar  
Mob: 0345-9405501

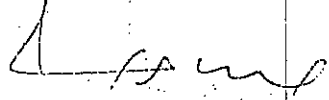
13.A

15	Mr. Gul Zar Ali Incharge Principal GHS Ghazi Killa FR Bannu.	Incharge Principal (BS-18) at GHS Barganattoo FR Bannu.	Vice S.No.14 in his own pay & Scale.
16	Mr. Noor Alam SST GHSS Eidak NWA under promotion as H/M and Repatriated to KPK vide SO Education notification No. 5845-854 dated 16/06/2017.	Head Master at GHS Taj Muhammad Kot NWA.	AVP
17	Mr. Mir Nawaz H/M (BS-17) GHS Musa Dara FR Peshawar.	Incharge Principal (BS-18) at GHS Kandi Zarin, Khel FR Peshawar	Vice S.No. 18 against (BS-18) post in his own pay & scale.
18	Mr. Fazli Karim (BS-17) Incharge Principal GHS Kandi Zarin Khel FR Peshawar.	Head Master at GHS Musa Dara FR Peshawar.	Vice S.No.17
19	Mr. Abdul Qadar H/M (BS-17) GHS Naraza Bajour Agency.	Head Master at GHS Top Mandal Bajour Agency.	Vice S.No. 20
20	Mr. Ghulam Farooq H/M (BS-17) GHS Top Mandal Bajour Agency.	Head Master (BS-17) GHS Naraza Bajour Agency.	Vice S.No. 19
21	Mr. Janzeb Khan H/M (BS-17) GHS Ghami Kor Mohmand Agency.	Vice principal at GHSS Ghalanal Mohmand Agency.	Against vacant (BS-18) post in his own pay & scale.
22	Mr. Arsala Khan H/M (BS-17) GHS Dab kor Mohmand Agency under order of repatriation to E&SE Department vide SO Notification No.SO/Edu/SSD FATA/5845-854 dated 16/06/2017.	Head Master (BS-17) at GHS Ghami Kor Mohmand Agency.	Vice S.No. 21

Secretary Social Sectors Department FATA

Copy of the above is forwarded to the:

1. Secretary Elementary & Secondary Education Khyber Pakhtunkhwa.
2. AGPR (Sub Office) Peshawar.
3. Director Elementary & Secondary Education Khyber Pakhtunkhwa.
4. Director Education FATA.
5. Deputy Secretary Education SSD FATA.
6. Agency Education Officers concerned.
7. Agency / District Accounts Officers Concerned.
8. Principals concerned.
9. Officers Concerned.
10. PS to Secretary SSD FATA.

  
Abdul Manan  
Section Officer Education

Better Copy No.13

**FATA SECRETARIAT**  
**(Social Sectors Department)**  
**Warsak Road Peshawar**

Dated Peshawar the July 25, 2017

**Corrigendum:-**

**No.SO/Edu/SSD/FATA/6023-033** in partial modification of this office notification **No.SO/Edu/SSD/FATA/1845-854** dated 16/06/2017 and with other consequential transfer/postings, the following adjustment/postings are hereby ordered in the interest of public service.

S. No	Name with designation and present place of posting	Posted adjusted as	Remarks
1.	Mr. Gohaar Khan V/P (BS-18) GHSS Jamrud Khyber Agency	Incharge Principal (BS-19) at GHS No.2 Jamrud Khyber Agency	AVP (B—19) post in his own pay and scale
2.	Mr. Saleem Khan Principal (BS-18) GHS Jan Khan Killi Khyber Agency	Principal (BS-19) at GHS Shagai Jamrud Khyber Agency	Vice S No.5
3.	Mr. Nawab Gul H/M (BS-17) Tood Kamar Khyber Agency.	Incharge Principal (BS-18) at GHS Jan Killi Khyber Agency	Vice S. NO.2 against post of (BS—18) in his own pay and scale
4.	Mr. Haq Mali H/M (BS-17) GHS Marha under order of transfer to GHS Datta Khel NWA	Headmaster GHS Tood Kamar landi Kotal Khyber Agency	Vice S No.3
5.	Mr. Mir Sardar Principal (BS-18) GHS Shagai Khyber Agency	Subject Specialist (BS-18) GCET Jamrud Khyber Agency	Vice S No.6
6.	Mr. Fazli Wahab Subject Specialist Chemistry GCET Khyber Agency.	Vice principal (BS-18) at GHSS Jamrud Khyber Agency	Vice S. NO.2 against post of (BS—18) in his own pay and scale
7.	Mr. Inayat Ali Principal (BS-18) GHS Mahoora Kurram Agency.	Incharge Principal (BS-19) at GHS Shalozan Kurram Agency	Against vacant principal (BS-19) in his own pay and scale
8.	Mr. Imam Ali H/M (BS-17) under order of adjustment at GHS Manato Kurram Agency	Incharge Principal (BS-19) at GHS Mahoora Kurram Agency	Vice S. NO.7 against post of (BS—18) in his own pay and scale
9.	Mr. Munir Hussain H/M (BS-17) under adjustment of at GHS Bughdi Kurram Agency	Head Master at GHS Manto Kurram Agency	Vice S No.8
10.	Mr. Mir Sade Khan H/M (BS-17) under repatriation to E & SE Khyber Pakhtunkhwa vide SO Education notification No.5845-854 dated 16/06/2017	Head master at GHS Spaider Orakzai Agency	Vice S No.11
11.	Mr. Zia Ul Haq H/M (BS-17) GHS Spiadar Orakzai Agency	Incharge Principal at GHS Datta Khel NWA	Against vacant Principal (BS-19) post in his own pay and scale
12.	Mr. Misal Khan H/M (BS-17) GHS Sandu Khel Mohmand Agency	Incharge Principal (BS-19) at GHS Haji Yar Jan Killi Mohmand Agency	Vice S.No.13 in his own pay and scale
13.	Mr. Laiq Jan H/M (BS-17) GHS Haji Yar Jan Mohmand Agency	Head Master at GHS Sandu Khel Mohmand Agency	Vice S No.12
14.	Mr. Saif Ullah Principal (BS-18) GHS Barganaroo FR Bannu	Principal (BS-18) At GHS Ghazi Killi Fr Bannu	Vice S No.13

**JAVED IQBAL Gul Bela**  
Daudzai Law Chamber  
Advocate High Court Peshawar  
Mob: 0345-9405501

Better Copy No.13A

S. No	Name with designation and present place of posting	Posted adjusted as	Remarks
15.	Mr. Gul Zar Ali incharge Principal GHS Ghazi Killa FR Bannu	Incharge Principal (BS-19) at GHS Barganattoo FR Bannu	Vice S. NO.14 in his own pay and scale
16.	Mr. Noor Alam SST GHSS Eidak NWA under promotion as H/M and Repatriated to Khyber Pakhtunkhwa vide SO education notification No. 5845-854 dated 15/06/2017	Head Master at GHS Taj Muhammad Kot NWA.	AVP
17.	Mr. Mir Nawaz H/M (BS-17) GHS Musa Dara FR Peshawar.	Incharge Principal (BS-18) at GHS Kandi Zarin Khel FR Peshawar.	Vice S. NO.18 against post of (BS—18) in his own pay and scale
18.	Mr. Fazli Karim (BS-17) Incharge Principal GHS Kandi Zarin Khel FR Peshawar	Head master At GHS Musa Dara FR Peshawar	Vice S.NO.17
19.	Mr Abdul Qadar H/M (BS-17) GHS Maraza Bajour Agency.	Head Master at GHS Top Mandal Bajour Agency	Vice S.NO.20
20.	Mr. Ghulam Farooq H/M (BS-17) GHS Top Mandal Bajour Agency.	Head Mster (BS-17) GHS Naraza Bajour Agency	Vice S.NO.19
21.	Mr. Janzeb Khan H/M (BS-17) GHS Ghani Kor Mohmand Agency.	Vice Principal at GHSS Ghalanai MOhmand Agency	Against Vacant (BS—18) post in his own pay and scale
22.	Mr. Arssala Khan H/M (BS-17) GHS Dab Kor Mohmand Agency under order of repatriation to E & SE department vide SO notification No.SO-Edu/SSD/FATA/5845-854 dated 16/06/2017.	Head Master (BS-17) at GHS Ghani Kor Mohmand Agency	Vice S.NO.21

Secretary Social Sectors department FATA

Copy of the above is forwarded to the:

1. Secretary Elementary and Secondary Education Khyber Pakhtunkhwa.
2. AGPR (Sub Office) Peshawar.
3. Director Elementary and Secondary Education Khyber Pakhtunkhwa.
4. Director Education FATA.
5. Deputy Secretary Education SSD FATA.
6. Agency Education Officers Concerned.
7. Agency/District Accounts Officers concerned.
8. Principals Concerned.
9. Officers Concerned.
10. Ps to Secretary SSD FATA.

Abdul Manan  
Section Officer Education.

JAVED NOBAL Gul Bafa  
Daudzai Law Chamber  
Attorney at Law High Court Peshawar  
Mob. 0345-9405501





GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

(14)

A. W. W. W. W.

Dated Peshawar the February 12, 2019

**NOTIFICATION**

**NO. SO(SM)E&SED/2-1/2019/Posting/Transfer/General:** The Competent Authority is pleased to order posting/transfer/adjustment of the following officers of E&SE Department on the posts/stations as mentioned against each, in the interest of public service with immediate effect:

Sl#	Name, designation & present place	Posted as	Remarks
1)	Mr. Inayat Ullah, Principal (BS-19) GHSS Kabal Swat	Principal (BS-19) GHSS Matta Swat	V.S#2
2)	Mr. Ahmad Sultan, Principal (BS-19) GHSS Matta Swat	Principal (BS-19) GHSS Kabal Swat	V.S#1
3)	Mr. Jamil Ur Rehman, Principal (BS-18) GHSS Zarobi Swabi	Principal (BS-18) GHSS Jhanda Swabi	V.S#4
4)	Mr. Faqweem Ul Haq, Principal (BS-18) GHSS Jhanda Swabi	Principal (BS-18) GHSS Sheikh Jana Swabi	V.S#5
5)	Mr. Johar Ali, Principal (BS-18) GHSS Sheikh Jana Swabi	Principal (BS-18) GHSS Zarobi Swabi	V.S#3
6)	Mr. Muhammad Usman, (BS-18) Awaiting posting	Principal (BS-19) GHS Sia Warghar Dir Lower OPS	A.V.P.
7)	Mr. Ali Gohar, SS Biology (BS-18) Awaiting posting	Principal (BS-19) No.1 Alladand Malakand OPS	A.V.P.
8)	Mr. Tahir Khan, Vice-Principal (BS-18) GHSS Kohi Barmol Mardan	SS Biology (BS-18) GHSS Takkar Mardan	V.S#9
9)	Mr. Azmat, SS Biology (BS-18) GHSS Takkar Mardan	Vice-Principal (BS-18) GHSS Kohi Barmol Mardan	V.S#8
10)	Mr. Usman Shah, SS Economics (BS-18) Awaiting posting	Principal (BS-18) GHSS Jani Khan Kalny Dara Khyber	A.V.P.
11)	Mr. Masoch Ullah, SS Islamiat (BS-18) Awaiting posting	Principal (BS-18) GHS Kandi Zareen Khail Peshawar	V.S#12
12)	Mr. Amir Nawaz, HM (BS-17) working against (BS-18) GHS Kandi Zareen Khail Peshawar	HM (BS-17) GHS Toot Qamar Khyber	A.V.P.
13)	Mr. Ghayur Ahmad, SS Economics (BS-18) Awaiting posting	Principal (BS-18) GHS Sama Gharl Khyber	V.S#14
14)	Mr. Sardar, HM BS-17 working against (BS-18) GHS Sama Gharl Khyber	HM (BS-17) GHS Prang Dara Khyber	V.S#21
15)	Mr. Niaz Ali Khan, Principal (BS-18) GHSS Mama Khel Banochi Bannu	SS Biology (BS-18) GHSS Nurar Bannu	V.S#16
16)	Mr. Farid Ullah Shah, SS Biology (BS-18) GHSS Nurar Bannu	Principal (BS-18) GHSS Mama Khel Banochi Bannu	V.S#15
17)	Mr. Badshah Zamin, Principal (BS-18) GHSS kotkai Shangla	Vice-Principal (BS-18) GHSS Butyal Shangla	A.V.P.

ADVOCATE GENERAL  
Daudzai Law Chamber  
Advocate High Court Peshawar  
MO. 0345-9405501

ADVOCATE GENERAL  
Daudzai Law Chamber  
Advocate High Court Peshawar  
MO. 0345-9405501



14 A

**GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT**

18)	Mr. Shahid Iqbal, SS Statistics (BS-18) under adjustment at GHSS Ziamudara Dir Lower	Principal (BS-18) GHSS Akhoon Talab	A.V.P.
19)	Mr. Muhammad Salur, Instructor (BS-18) RITE (Malu) Timergara Dir Lower	Principal (BS-19) GHSS Balambar Dir Lower OPS	A.V.P.
20)	Mr. Minhajuddin, SS English (BS-18) GHSS Jaloza Nowshera	SS English (BS-18) GHSS Pirpal Nowshera	A.V.P.
21)	Mr. Muhammad Saleem, HM (BS-17) GHS Goda Swat	HM (BS-17) GHS Asala Swat	A.V.P.
22)	Mr. Akbar Ali, HM (BS-17) GHS Prang Dara Khyber	HM (BS-17) GHS Kamshalman Khyber	A.V.P.
23)	Mr. Abdul Jabbar, HM (BS-17) (Awaiting posting)	HM (BS-17) GHS Khadri Muhammad Khel Bannu	V.S#24
24)	Mr. Mir Qad Ayaz, HM (BS-17) GHS Khadri Muhammad Khel Bannu	HM (BS-17) GHS Dheri Saidan Mamash Khel Bannu	A.V.P.
25)	Mr. Gul Muhammad, HM (BS-17) GHS Kandur Mardan	HM (BS-17) GHS Sikandari Mardan	A.V.P.
26)	Mr. Sher Ghallib, HM (BS-17) GHS Babini Mardan	SS Pashto (BS-17) GHSS Mohabat Abad Mardan	A.V.P.
27)	Mr. Ihsanullah, HM (BS-17) GHS Mera Urmur Payan Peshawar	HM (BS-17) GHS Maryam Zai Peshawar	A.V.P.
28)	Mr. Muhammad Ayub, HM (BS-17) GHS Chamial Manshra	HM (BS-17) GHS Bandi Parawao Manshra	A.V.P.
29)	Syed Aleem Shah, HM (BS-17) GHS Balim Chitral	HM (BS-17) GHS Sonoghar Chitral	A.V.P.
30)	Mr. Abdur Rauf, HM (BS-17) GHS Ghundi Sheikhan Tank	HM (BS-17) GHS Ragha Sar Darazinda D.I. Khan	A.V.P.
31)	Mr. Hassan Habib, HM (BS-17) GHS Toti Bagh Orakzai	HM (BS-17) GHS Shin Dhand Kohat	A.V.P.
32)	Mr. Taj Muhammad, HM (BS-17) GHS Barh Malakand	HM (BS-17) GHS Haryan Kot Malakand	A.V.P.
33)	Mr. Sher Afzal, HM (BS-17) GHS Bazdara Poyan Malakand	HM (BS-17) GHS Barh Malakand	V.S#32
34)	Mr. Nasratullah, HM (BS-17) GHS Chapper Mishti Orakzai	HM (BS-17) GHS Chora Khyber	A.V.P.
35)	Mr. Kausar Ali Shah, HM (BS-17) GHS Sard Chinda Swabi	HM (BS-17) GHS Yar Hussain No.3 Swabi	A.V.P.
36)	Mr. Muhammad Riz, HM (BS-17) GHS Ichrian Manshra	HM (BS-17) GHS Nawaz Abad Manshra	V.S#37
37)	Mr. Mehboob Ur Rehman, HM (BS-17) GHS Nawaz Abad Manshra	HM (BS-17) GHS Ichrian Manshra	V.S#36
38)	Mr. Sher Afzal Khan, HM (BS-17) GHS Mitor Lakkhi Marwat	HM (BS-17) GHS Kaka Khel Lakkhi Marwat	A.V.P.
39)	Mr. Haq Nawaz Khan, HM (BS-17) GHS Mamoon Banda Hangu	HM (BS-17) GHS Khurram Karak	V.S#40
40)	Mr. Hafiz Ullah, HM (BS-17) GHS Khurram Karak	HM (BS-17) GHS Paloski Karak	A.V.P.

JAVED IQBAL Gul Bela  
Daudzai Law Chamber  
Advocate High Court Peshawar  
Mob. 0345-9405501

JAVED IQBAL Gul Bela  
Daudzai Law Chamber  
Advocate High Court Peshawar  
Mob. 0345-9405501



(15)

**GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT**

41)	Mr. Aamir Javed, HM (BS-17) GHS Khat Killi Prang Charsadda	HM (BS-17) GHS Hela Mohmandan Peshawar	A.V.P.
42)	Mr. Asfandyar, SS Chemistry (BS-18) GHSS Sado Dir Lower	SS Chemistry (BS-18) GHSS Manyal Dir Lower	A.V.P.
43)	Mr. Iqbal Ur Rehman, SS Pak Study (BS-18) GHSS Bogara Karak	SS Pak Study (BS-18) GHSS Karak	A.V.P.
44)	Mr. Sanat Ullah, SS Pak Study (BS-18) GHSS Karak	SS Pak Study (BS-18) GHSS Bogara Karak	A.V.P.
45)	Mr. Naveed Ali Khan, SS Statistics (BS-18) GHSS Lachi Kohat	SS Statistics (BS-18) GHSS Fough, Dula Kohat	A.V.P.
46)	Mr. Inam Ullah, SS Islamiat (BS-18) GHSS Gagra Buner	SS Islamiat (BS-18) GHSS Nagrai Buner	A.V.P.
47)	Mr. Raj Wali Khan, SS Islamiat (BS-18) GHSS Nagrai Buner	SS Islamiat (BS-18) GHSS Gagra Buner	A.V.P.
48)	Mr. Hafiz Irfan Ullah, SS Physies (BS-18) GHSS Ramak D.I. Khan	SS Physies (BS-18) GHSS No.2 D.I. Khan	A.V.P.
49)	Mr. Muhammad Tariq, SS Urdu (BS-18) GHSS Lachi Kohat	SS Urdu (BS-18) GHSS Karak	A.V.P.
50)	Mr. Gul Muhammad, SS Urdu (BS-17) GHSS Jalsai Swabi	SS Urdu (BS-17) GHSS Manki Swabi	A.V.P.
51)	Mr. Muhammad Faiq, SS Islamiat (BS-17) GHSS Ghurghushto Buner	SS Islamiat (BS-17) GHSS Kalo Khan Swabi	A.V.P.
52)	Mr. Sheraz Khan, SS Maths (BS-18) GHSS Lora Abbottabad	SS Maths (BS-18) GHSS Dagnour Abbottabad	A.V.P.
53)	Mr. Muhammad Junaid, SS Biology (BS-17) GHSS Jalsai Swabi	SS Biology (BS-17) GHSS Kundu Swabi	A.V.P.
54)	Mr. Naeem Jan, SS Pashto (BS-17) GHSS Baka Khel Bannu	SS Pashto (BS-17) GHSS Damol Bannu	A.V.P.
55)	Mr. Akhtar Rasool, SS Maths (BS-17) GHSS Peer Abad Mardan	SS Maths (BS-17) GHSS Khar Mulakand	A.V.P.
56)	Mr. Zakir Ullah, SS Biology (BS-17) GHSS Tamab Peshawar	SS Biology (BS-17) Garhi Ghulam Shah Peshawar	A.V.P.
57)	Mr. Fazli Rehman, SS Urdu (BS-17) under transfer at GHSS Ibrahim Zai Hangu	SS Urdu (BS-17) GHSS Muhammad Khwaja Hangu	A.V.P.
58)	Mr. Hashmat Ali, SS Physies (BS-17) GHSS Sakhra Swat	SS Physies (BS-17) GHSS Batal Khwaza Khela Swat	A.V.P.
59)	Mr. Usman Ali, SS IT (BS-17) GHSS Charbagh Swat	SS IT (BS-17) GHSS Kokarai Swat	A.V.P.
60)	Mr. Musawar Jan, SS Economics (BS-17) GHSS Baghicha Dheri Mardan	SS Economics (BS-17) GHSS Dargai Charsadda	A.V.P.
61)	Mr. Hameed Ullah, SS Urdu (BS-17) GHSS Musha Mansoor Lakkhi Marwat	Lakozai Bannu	A.V.P.
62)	Mr. Fazli Malik, SS Physies (BS-17) GHSS Sikandari Swabi	SS Physies (BS-17) GHSS Panjpir Swabi	A.V.P.

**JAVED IQBAL Gul Bela**  
Daudzai Law Chamber  
Advocate High Court Peshawar  
Mob: 0345-9405501

**JAVED IQBAL Gul Bela**  
Daudzai Law Chamber  
Advocate High Court Peshawar  
Mob: 0345-9405501

Better Copy No.15

**Government of Khyber Pakhtunkhwa Elementary and  
Secondary Education Department**

41.	Mr. Amir Javed, HM (BS-17) GHS Khat Killi Prang Charsadda.	HM (BS-17) GHS Mohmandan Peshawar	AVP
42.	Mr. Asfandyar, SS Chemistry (BS-18) GHSS Ssado Dir Lower	SS Chemistry (BS-17) GHSS Manyal Dir Lower	AVP
43.	Mr. Iqbal Ur Rehman, SS Pak Study (BS-18) GHSS Bogara Karak	SS Pak Study (BS-17) GHSS karak	AVP
44.	Mr. Sanat Ullah, SS Pak Study (BS-18) GHSS Karak.	SS Pak Study (BS-18) GHSS Bagara karak	AVP
45.	Mr. Naveed Ali Khan, SS Statistics (BS-18) GHSS Lachi Kohat.	SS Statistics (BS-18) GHSS Bala Kohat	AVP
46.	Mr. Inam Ullah, SS Islamiat (BS-18) GHSS Gagra Buner	SS Islamiat (BS-18) GHSS Nagral Buner	AVP
47.	Mr Raj Wali Khan, SS Islamiat (BS-18) GHSS Nagai Buner	SS Islamiat (BS-18) GHSS No.2 D.I Khan	AVP
48.	Mr Hafiz Irfan Ullah, SS Physics (BS-18) GHSS Ramak D.I Khan	SS Physics (BS-18) GHSS D.I Khan	AVP
49.	Mr Muhammad Tariq , SS Urdu (BS-18)	SS Urdu (BS-17) GHSS Karak	AVP
50.	Mr. Gul Muhammad, SS Urdu (BS-17) GHSS Jalsai Swabi.	SS Urdu (Bs-17) GHSS Mankal Swabi	AVP
51.	Mr. Muhammad Faiq, SS Islamiat (BS-17) GHSS Ghurghushto Buner	SS Islamiat (Bs-17) GhSS Kalo Khan Swabi	AVP
52.	Mr. Sheraz Khan, SS Maths (BS-17) GHSS Lora Abbottabad	SS Maths (Bs-17) Bagnaotar Abbottabad	AVP
53.	Mr. Muhammad Junaid SS Biology (BS-17)GHSS Jalsai Swabi.	SS Biology (BS-17) GHSS Kunda Swabi	AVP
54.	Mr. Naeem Jan, SS Pashto (BS-17) GHSS Baka Khel Bannu	SS Pashto (Bs-17) GHSS Domel Bannu	AVP
55.	Mr. Zakir Ullah, SS Biology (BS-17) GHSS Peer Abad Mardan.	SS Pashto (Bs-17) GHSS Khar Malakand	AVP
56.	Mr Zakir Ullah, SS Biology (BS-17) GHSS Peer Abad Mardan	SS Biology (Bs-17) Garhi Ghulam Shah Peshawar	AVP
57.	Mr Fazli Rehman, SS Urdu (BS-17) Under transfer at GHSS Ibrahim Zai Hangu	SS Urdu (Bs-17) GHSS Muhammad Khwaja Hangu	AVP
58.	Mr Hashmat Ali, SS Physics (BS-17) GHSS Saakhra Swat.	SS Physics (Bs-17) GHSS Batal Khwaza khela Swat	AVP
59.	Mr. Usman Ali, SS IT (BS-17) GHSS Charbagh Swat.	SS IT (Bs-17) GHSS Kokaral Swat	AVP
60.	Mr. Musawar Jan, SS Economics (BS-17) GHSS Baghicha Gheri	SS Economics (Bs-17) GHSS Dargai Charsadda.	AVP
61.	Mr. Hikmat Ullah BS-17 Masho Mansoor Lakki marwat	Lalozai Bannu	AVP
62.	Mr Fazli malik, SS Physics (BS-17) GHSS Sikandar Swabi	SS Physics (Bs-17) GHSS Panjpir Swabi.	AVP

**JAVED IQBAL** Gul Bela  
Daudzai Law Chamber  
Advocate High Court Peshawar  
Mob: 0346-9405507



(16)

**GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT**

63)	Mr. Akhtar Hussain, SS H/Civics (BS-17) GHSS Zakhi Qabranan Nowshera	SS H/Civics (BS-17) GHSS Daag Peshawar	A.V.P
64)	Mr. Fareed Ullah Shah, SS Chemistry (BS-17) GHSS Sufaid Sang Peshawar	SS Chemistry (BS-17) GHSS Zahirabad Peshawar	A.V.P
65)	Mr. Masood Anwar, SS Statistics (BS-17) GHSS Nafi Khel Nowshera	SS Statistics (BS-17) GHSS Pakhtoon Garhi Nowshera	A.V.P
66)	Mr. Afzal Khan, SS Pak Study (BS-17) GHSS Salim Khan Swabi	SS Pak Study (BS-17) GHSS Maneri Payan Swabi	A.V.P
67)	Mr. Munisif Khan, SS Economics (BS-17) GHSS Umar Payan Peshawar	SS Economics (BS-17) GHSS Muzazai Peshawar	A.V.P
68)	Mr. Akmal Hussain, SS English (BS-17) GHSS Birote Abbottabad	SS English (BS-17) GHSS Bagnotar Abbottabad	A.V.P
69)	Mr. Sardar Khan, SS Maths (BS-17) GHSS Ushera Dir Upper	SS Maths (BS-17) GHSS Gumseer Dir Upper	A.V.P
70)	Mr. Irfan Ullah, SS Economics (BS-17) GHSS Salim Khan Swabi	SS Economics (BS-17) GHSS Maneri Payan Swabi	A.V.P
71)	Mr. Mehboob Alam, SS Biology (BS-17) GHSS Shahbaz Khel Lakki Marwat	SS Biology (BS-17) GHSS Kot Kashmir Lakki Marwat	A.V.P
72)	Mr. Tariq Aziz Khan, SS Biology (BS-17) GHSS Wanda Lali D.I. Khan	SS Biology (BS-17) GHSS Shahbaz Khel Lakki Marwat	V.S#71
73)	Mr. Ijaz, SS H/Civics (BS-17) GHSS Nisatta Charsadda	SS H/Civics (BS-17) GHSS No.1 Charsadda	A.V.P
74)	Mr. Waqar Ahmad, SS Economics (BS-17) GHSS Ghala Dher Maran	SS Economics (BS-17) GHSS Muhammad Nari Charsadda	A.V.P
75)	Mr. Ayaz Gul, SS Statistics (BS-17) GHSS Chanda Khuram Karak	SS Statistics (BS-17) GHSS Dabli Lawaghar Karak	A.V.P
76)	Mr. Aftab Ali, SS Urdu (BS-17) under transfer at GHSS Akbar Para Nowshera	SS Urdu (BS-17) GHSS Manki Sharif Nowshera	A.V.P
77)	Mr. Waqar Ahmad, SS Islamiyat (BS-17) GHSS Garum Chishma Chitral	SS Islamiyat (BS-17) GHSS Ayun Chitral	A.V.P
78)	Mr. Bashir Zada, SS H/Civics (BS-17) GHSS Chamtar Mardan	SS H/Civics (BS-17) GHSS Mazdoor Abad Mardan	A.V.P
79)	Mr. Hassan Zaman, SS Physics (BS-17) GHSS Ashkar Kot South Waziristan	SS Physics (BS-17) GHSS Nadir Budin Khel Wazir Sub-Division Bannu	A.V.P
80)	Mr. Sardar Gul, SS Economics (BS-17) GHSS Mall Khel Bala Nowshera	SS Economics (BS-17) GHSS Zahir Abad Peshawar	A.V.P
81)	Mr. Haider Ali, SS Biology (BS-17) GHSS Bampokha Buner	SS Biology (BS-17) GHSS Charbagh Swat	A.V.P
82)	Mr. Tariq Javed, SS Chemistry (BS-17) under adjustment at GHSS Daraban Kalan D.I. Khan	HM (BS-17) GHS Lunda Sharif D.I. Khan	A.V.P

Ijaz QBAI, Gul Bala  
Daudzai Law Chamber  
Advocate High Court Peshawar  
Mob. 0345-9465601





**GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT**

17

103	Mr. Doat Muhammad, SS Economics (BS-17) GHSS Mardan Chitral	SS Economics (BS-17) GHSS Chitral Chitral Chitral	A.V.P.
104	Mr. Attullah, SS English (BS-17) GHSS Chitral Chitral Chitral	SS English (BS-17) GHSS Dera Ishtiaq Chitral	A.V.P.
105	Mr. Abdul Hamid Laddi, SS Maths (BS-17) GHSS Feroz Manshera	SS Maths (BS-17) GHSS No.1 Abbottabad	A.V.P.
106	Mr. Muhammad Subhan, SS H/Civics (BS-17) under transfer to GHSS Harro Abbottabad	SS H/Civics (BS-17) GHSS No.1 Abbottabad	A.V.P.
107	Mr. Muhammad Saleem, SS H/Civics (BS-17) GHSS Kakori Haripur	SS H/Civics (BS-17) GHSS Harro Abbottabad	V.S/100
108	Mr. Shabir Ahmad, SS Urdu (BS-17) GHSS Biroto Abbottabad	SS Urdu (BS-17) GHSS No.1 Abbottabad	A.V.P.
109	Mr. Tahir Nawaz, SS Pak Study (BS-17) GHSS Agarwal Duner	SS Pak Study (BS-17) GHSS Harkot Haripur	A.V.P.
110	Mr. Iftikhar Mahmood, SS Chemistry (BS-17) GHSS Allaud Malakand	SS Chemistry (BS-17) GHSS No.1 Sakhtokot Malakand	A.V.P.
111	Mr. Rashed Ahmad, SS H/Civics (BS-17) GHSS Chorbagh Swat	SS H/Civics (BS-17) GHSS No.3 Mingora Swat	A.V.P.
112	Mr. Sadique Ahmad, SS Economics GHSS Tar D.I. Khan	SS Economics (BS-17) GHSS Shorkot D.I. Khan	A.V.P.
113	Mr. Hafiz Hussain, SS Maths (BS-17) GHSS Haryana Bala Peshawar	SS Maths (BS-17) GHSS Quilbaha Peshawar	A.V.P.
114	Mr. Zahir Ali Shah, SS H/Civics (BS-17) GHSS Urmar Payan Peshawar	SS H/Civics (BS-17) GHSS Wazir Dagh Peshawar	A.V.P.
115	Mr. Qamar Rehman, SS Biology (BS-17) GHSS Gulbala Peshawar	SS Biology (BS-17) GHSS Hayatabad Peshawar	A.V.P.
116	Mr. Qudus Hazrat, SS Chemistry (BS-17) GHSS Spiti Dand Dera Khyber	SS Chemistry (BS-17) GHSS Chahani Mohmand	A.V.P.
117	Mr. Shams Ul-Qamar, SS Islamiyat (BS-17) GHSS Jehangira Swabi	SS Islamiyat (BS-17) GHSS Kundu Swabi	A.V.P.
118	Mr. Zahir Ali, SS Physics (BS-17) GHSS Kozpaw Shangla	SS Physics (BS-17) GHSS Chowga Shangla	A.V.P.
119	Mr. Mushiq Ali, SS H/Civics (BS-17) GHSS Sarai Bala Dir Lower	SS H/Civics (BS-17) GHSS Abaha Swat	A.V.P.
120	Mr. Akmal Hussain, SS English (BS-17) GHSS Biroto Abbottabad	SS English (BS-17) GHSS Bagnotar Abbottabad	A.V.P.
121	Mr. Muhammad Shafi, SS Urdu (BS-17) GHSS Talswal Abbottabad	SS Urdu (BS-17) GHSS Chamiall Abbottabad	A.V.P.
122	Mr. Afzal Khan, SS Pak Study Duner	SS Pak Study (BS-17) GHSS Jhamra Haripur	A.V.P.
123	120) Awaiting posting		
124	Mr. Rizwan Ali, SS Urdu (BS-17) GHSS Sharohi Gurhi Orakzai	SS Urdu (BS-17) GHSS Orakzai	

**JAVED IQBAL** Gul Bela  
Daudzai Law Chamber  
Advocate High Court Peshawar  
Mob: 0345-9405501

**JAVED IQBAL** Gul Bela  
Daudzai Law Chamber  
Advocate High Court Peshawar  
Mob: 0345-9405501

Better Copy No.17

**Government of Khyber Pakhtunkhwa Elementary and  
Secondary Education Department**

103.	Mr. Dost Muhammad SS Economics (BS-17) GHSS Mastuj Chitral	SS Economics (BS-17) GHSS Mastuj Chitral	AVP
104.	Mr Abdullah, SS English (BS-17) GHSS Chitral	SS English (BS-17) GHSS Chitral	AVP
105.	Mr. Abdul Hameed Lodhi, SS maths (BS-17) GHSS Mansehra	SS maths (BS-17) GHSS Mansehra	AVP
106.	Mr. Muhammad Sughan, SS Civics (BS-17) under transfer to GHSS Harnoi Abbottabad	SS Civics (BS-17) under transfer to GHSS Harnoi Abbottabad	AVP
107.	Mr. Muhammad Saleem SS H/Civics (BS-17) GHSS Kakotri Haripur.	SS H/Civics (BS-17) GHSS Kakotri Haripur.	AVP
108.	Mr Shabir Ahmad, SS Urdu (BS-17) GHSS Abbottabad	SS Urdu (BS-17) GHSS Abbottabad	AVP
109.	Mr Tahir Nawaz SS Pak study (BS-17) GHSS Agarai Buner	SS Pak study (BS-17) GHSS Agarai Buner	AVP
110.	Mr. Ihsan Mehmood, SS Chemistry (BS-17) GHSS Malakand	SS Chemistry (BS-17) GHSS Malakand	AVP
111.	Mr Rashid Ahmad SS H/Civics (BS-17)GHSS Charbagh Swat	SS H/Civics (BS-17)GHSS Charbagh Swat	AVP
112.	Mr. Seaddique Ahmad SS Economics GHSS Lar D.I Khan	SS Economics GHSS Lar D.I Khan	AVP
113.	Mr. Iltaf Hussain SS Maths (BS-17) GHSS Haryana Bala Peshawar	SS Maths (BS-17) GHSS Haryana Bala Peshawar	AVP
114.	Mr Zaheer Ali Shah SS H/Civics (BS-17) GHSS Urmar Payan Peshawar	SS H/Civics (BS-17) GHSS Urmar Payan Peshawar	AVP
115.	Mr. Gohar Rehman, SS Biology (BS-17) GHSS Gulbela Peshawar	SS Biology (BS-17) GHSS Gulbela Peshawar	AVP
116.	Mr. Ghulam Hazrat, SS Chemistry (BS-17) GHSS Spn Dand Dara Khyber	SS Chemistry (BS-17) GHSS Spn Dand Dara Khyber	AVP
117.	Mr. Shams Ul Qamar, SS Islamiat (BS-17) GHSS jehangir Swabi	SS Islamiat (BS-17) GHSS jehangir Swabi	AVP
118.	Mr Zafar Ali SS Physics (BS-17) GHSS Kozpaw Shangla	SS Physics (BS-17) GHSS Kozpaw Shangla	AVP
119.	Mr. Mushtaq Ali SS H/Civics (BS-17) GHSS Sarai Bal Dir Lower	SS H/Civics (BS-17) GHSS Sarai Bal Dir Lower	AVP
120.	Mr. Akmal Hussain SS English (BS-17) GHSS Birot Abbottabad	SS English (BS-17) GHSS Birot Abbottabad	AVP
121.	Mr. Muhammad Shafi, SS Urdu (BS-17) GHSS Taj wal Abbottabad	SS Urdu (BS-17) GHSS Taj wal Abbottabad	AVP
122.			AVP
123.	(BS-17) Awaiting posting		AVP
124.	Mr ___ Ali SS Urdu (BS-17) GHSS Sharobi Garhi Orakzai	SS Urdu (BS-17) GHSS Sharobi Garhi Orakzai	AVP

**JAVED IQBAL** Gul Bela  
 Daudza Law Chamber  
 Advocate High Court Peshawar  
 Mob: 0345-9405501



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

125	Mr. Mushinq Ali, SS Urdu (BS-17) GHSS Kalaya Orakzai	SS Urdu (BS-17) GHSS Srobl Gurhi Orakzai	V.S#125
126	Mr. Nasrullah, SS English (BS-17) Working against SS Urdu GHSS Spin Dand Bara Khyber	SS English (BS-17) GHSS No.1 Jamrod Khyber	A.V.P.
127	Mr. Nazir Muhammad, SS Economics (BS-17) GHSS Ziarat Talash Dir Lower	SS Economics (BS-17) GHSS Tangi Timergara Dir Lower	V.S#127
128	Mr. Muhammad Shah Khaisro, SS Economics (BS-17) GHSS Tangi Timergara Dir Lower	SS Economics (BS-17) GHSS Ziarat Talash Dir Lower	V.S#128
129	Mr. Zahir Ullah, SS Chemistry (BS-17) GHSS No.2 Peshawar City	SS Chemistry (BS-17) GHSS Gulbela Peshawar	V.S#129
130	Mr. Habib Ur Rehman Anjum, SS Chemistry (BS-17) GHSS Gulbela Peshawar	SS Chemistry (BS-17) GHSS No.2 Peshawar City	V.S#130
131	Mr. Umer Gul, SS Islamiat (BS-17) GHSS Pيران Manshara	SS Islamiat (BS-17) GHSS Dhodjal Manshara	A.V.P.
132	Mr. Jan Muhammad, SS Economics (BS-17) GHSS Mayar Mardan	SS Economics (BS-17) GHSS Dargui Charsadda	A.V.P.
133	Mr. Hidayat Hussain, SS Islamiat (BS-17) GHSS Kawai Manshara	SS Islamiat (BS-17) GHSS Doga Manshara	V.S#133
134	Mr. Muhammad Rafiqat, SS Islamiat (BS-17) GHSS Doga Manshara	SS Islamiat (BS-17) GHSS Kawai Manshara	V.S#134
135	Mr. Ubaid Ullah, SS Biology (BS-17) GHSS Mankial Swat	SS Biology (BS-17) GHSS Madynn Swat	A.V.P.
136	Mr. Aftab Hussain, SS English (BS-17) GHSS Salim Khan Swabi	SS English (BS-17) GHSS Panjpir Swabi	A.V.P.
137	Mr. Ahmad Din, SS H/Civics (BS-17) GHSS Manki Swabi	SS H/Civics (BS-17) GHSS Jehangira Swabi	A.V.P.
138	Mr. Haleem Gul, SS Economics (BS-17) GHSS Thakra Manshara	SS Economics (BS-17) GHSS Pيران Manshara	A.V.P.
139	Mr. Liaqat Ali, SS Economics (BS-17) GHSS Sirkot Haripur	SS Economics (BS-17) GHSS Pannian Haripur	A.V.P.
140	Mr. Saqaulah, SS Economics (BS-17) GHSS Panjpir Swabi	SS Economics (BS-17) GHSS Kunda Swabi	A.V.P.
141	Mr. Gul Munir Khan, SS Economics (BS-17) GCMHSS Dir Upper	SS Economics (BS-18) GHSS Wari Dir Upper OPS	A.V.P.
142	Mr. Muhammad Hanif, SS H/Civics (BS-17) GHSS Malakand Dir Lower	SS H/Civics (BS-17) GHSS Kambat Dir Lower	A.V.P.
143	Mr. Rafiqat Usman, SS Physics (BS-17) GHSS Naryab Hangu	SS Physics (BS-17) GHSS Shah Salim Karak	A.V.P.
144	Mr. Abdur Rahim, SS Economics (BS-17) GHSS Abdul Khel D.I. Khan	SS Economics (BS-17) GHSS Yarik D.I. Khan	A.V.P.
145	Mr. Hasnain Ali, SS English (BS-17) GHSS Bagra Buner	SS English (BS-17) GHSS Tall Kabal Swat	A.V.P.

JAVED IQBAL, Gul Bela  
Daudzai Law Chamber  
Peshawar High Court Peshawar  
Mob: 0345-9405501

JAVED IQBAL  
Daudzai Law Chamber  
Advocate High Court Peshawar  
Mob: 0345-9405501





**GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT**

146	Mr. Zahid Mansoor, SS Chemistry (BS-17) GHSS Abdul Khel Lakki Marwat	SS Chemistry (BS-17) GHSS Mamash Khel Bannu	A.V.P
147	Mr. Sharif Ahmad, SS H/Civics BS-17 GHSS Ganum Chishma Chitral	SS H/Civics BS-17 GHSS Ayun Chitral	A.V.P
148	Mr. Suhail Ahmad, SS Biology (BS-17) GHSS Abdul Khel D.I. Khan	SS Biology (BS-17) GHSS Dara Pezu Lakki Marwat	A.V.P
149	Mr. Fakhr Abbass, SS Statistics (BS-17) GHSS Kotjai D.I. Khan	SS Statistics (BS-17) GHSS Darban Khurd D.I. Khan	A.V.P
150	Mr. Rafeed Ullah Khan, SS English (BS-17) Awaiting posting	SS English (BS-17) GHSS Sarobi Garhi Orakzai	A.V.P
151	Mr. Muhammad Aziz, SS Economics (BS-17) under transfer at GHSS Chitor Swat	SS Economics (BS-17) GHSS Deolai Swat	A.V.P
152	Mr. Akhtar Nawab, SS Economics (BS-18) GHSS Khwazakhela Swat	Vice-Principal (BS-18) GHSS Khwazakhel Swat	V.S/153
153	Mr. Fazal Rehman, Vice Principal (BS-18) GHSS Khwazakhel Swat	SS Economics (BS-18) GHSS Khwazakhela Swat	V.S/152
154	Mr. Muhammad Wajid Khan, SS English (BS-17) GHSS Warana Karak	SS English (BS-17) GHSS Nurar Bannu	A.V.P
155	Mr. Farman Ali, SS Pak Study (BS-17) GHSS Ziarat Kaka Sahib Nowshera	SS Pak Study (BS-17) GSUZCMHSS No.2 Peshawar City	A.V.P
156	Mr. Shams ur Rahman, SS H/Civics (BS-17) GHSS Gagra Buner	SS H/Civics (BS-17) Bagra Buner	A.V.P
157	Mr. Khalid Mehmood, SS Urdu (BS-17) GHSS Ziarat Masoom Abbottabad	SS Urdu (BS-17) GHSS Mohri Bed Bhen Abbottabad	A.V.P
158	Mr. Siraj Ud Din, SS Islamiat (BS-17) GHSS Bagh Dushkhel Dir Lower	SS Islamiat (BS-17) GHSS Khazana Dir Lower	A.V.P
159	Mr. Abdus Salam, SS Pashto (BS-17) GHSS Ayub Khan Killi Swabi	SS Pashto (BS-17) GHSS Jalsai Swabi	A.V.P
160	Mr. Shah Faisal, SS Chemistry (BS-17) GHSS Kanal Haripur	SS Chemistry (BS-17) GHSS No.1 Abbottabad	A.V.P
161	Mr. Sher Zada, SS Physics (BS-17) GHSS Khairabad Dir Lower	SS Physics (BS-17) GHSS Ouch Dir Lower	A.V.P
162	Mr. Saleem Ullah, SS Maths (BS-17) GHSS Asban Dir Lower	SS Maths (BS-17) Chakdara Dir Lower	A.V.P
163	Mr. Wali Rahman, SS Pashto (BS-17) GHSS Ikram Pur Mardan	SS Pashto (BS-17) GHSS Ghani Dheri Malakand	A.V.P
164	Mr. Muhammad Imran, SS Biology (BS-17) GHSS Musazai Peshawar	SS Biology (BS-17) GHSS Naudeli Puyan Peshawar	A.V.P
165	Mr. Hayat Khan, SS Physics (BS-17) GHSS Kati Garhi Mardan	SS Physics (BS-17) GHSS Manzoor Abd Mardan	A.V.P
166	Mr. Muhammad Sayal, SS Islamiat (BS-17) GHSS Jhamra Haripur	SS Islamiat (BS-17) GHSS Sirkot Haripur	A.V.P

FAVFD IQBAI, Gulistan  
Daha, Law Chamber  
Across a High Court Building  
Mob: 0345-9405501



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

167	Mr. Bid Akbar, SS Economics (BS-17) GHSS Rashakai Nowshera	SS Economics (BS-17) GHSS Mohib Banda Nowshera	A.V.P.
168	Mr. Muhammad Relman, SS Economics (BS-17) GHSS Miandam Swat	IIM (BS-17) GHSS Sigram Swat	A.V.P.
169	Mr. Shafiqullah, SS English (BS-17) under adjustment at GHSS Beyar Dir Upper	SS English (BS-17) GHSS Qulandi Dir Upper	A.V.P.
170	Mr. Mian Ejaz Mustafa, SS Economics (BS-17) GHSS Karori Manshra	SS Economics (BS-18) GHSS Baffa Manshra OPS	A.V.P.
171	Mr. Atta-Ur-Rehman Amjid, SS Islamiat (BS-17) GHSS Karori Manshra	SS Islamiat (BS-17) GHSS Pairan Manshra	A.V.P.
172	Mr. Rahman Janan, SS H/Civics (BS-17) GHSS Dallan Hangu	SS H/Civics (BS-17) GHSS Mandoori Kohat	A.V.P.
173	Mr. Muhammad Saeed Siddiqi, (BS-18) under adjustment at GHSS Shikolai puran Shangla	Principal (BS-18) GHSS Kozpaw Shangla	A.V.P.
174	Mr. Asadullah, SS H/Civics (BS-17) GHSS Asbanr Dir Lower	SS H/Civics (BS-17) GHSS Chakdara Dir Lower	A.V.P.
175	Mr. Mehboob Ur Rehman, SS Pak Study (BS-17) GHS Nara Amuzai Haripur	SS Pak Study (BS-17) GHSS Jab Haripur	A.V.P.
176	Mr. Junaid Khan, SS Biology (BS-17) GHSS Sijban Swat	SS Biology (BS-17) GHSS Charbagh Swat	A.V.P.
177	Mr. Amal Bad Shah, SS Pashto (BS-17) GHSS Shahbaz Khel Lakki Marwat	SS Pashto (BS-17) GHSS Landiwah Lakki Marwat	A.V.P.
178	Mr. Imran Khan, SS Maths (BS-17) working against SS Statistics at GHSS Pairan Manshra	SS Maths (BS-17) GHSS Dingi Haripur	A.V.P.
179	Mr. Zahir ul Haq, SS Pak Study (BS-17) GHSS Pashtoon Garhi Nowshera	SS Pak Study (BS-17) GHSS Mohib Banda Nowshera	A.V.P.
180	Mr. Muhammad Jamal, Superintendent (BS-17) working against Coordinating Engineer at Directorate of E&SE	Superintendent (BS-17) Directorate of E&SE	A.V.P.
181	Mr. Qayum Nawaz, SIPE (BS-18) GHSS Abdul Khel Lakki Marwat	SIPE (BS-18) GHSS No.3 Lakki Marwat	A.V.P.
182	Mr. Muhammad Haroon, SIPE (BS-18) GHSS Madyan Swat	SIPE (BS-18) GHSS Ismalla Swabi	A.V.P.
183	Mr. Neckhatullah, SIPE (BS-18) GHSS Gumbat Kohat	SIPE (BS-18) GHSS Wurana Karak	A.V.P.
184	Mr. Habib Ullah, SIPE (BS-18) RITE (Male) Kohat	SIPE (BS-18) GHSS Jani Khel Bannu	A.V.P.
185	Mr. Aurang Zeb, IPE (BS-17) GHSS Bama Kheja Swat	IPE (BS-17) GHSS No.3 Mingora Swat	A.V.P.

JAVED IQRAT, Gul Bela  
Daudzai, J. Chamber  
Advocate High Court Peshawar  
Mob: 0345-9405501

JAVED IQRAT, Gul Bela  
Daudzai, J. Chamber  
Advocate High Court Peshawar  
Mob 0345-9405501



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

186	Mr. Gul Ajab Khan, IPE (BS-17) GHSS Mulazai Tank	IPE (BS-17) GHSS Landiwah Lakki Marwat	A.V.P.
187	Mr. Rabnawaz, IPE (BS-17) GHSS Mian Khan Mardan	IPE (BS-17) GHSS Mulazai Tank	V.S.I. 186
188	Mr. Abdul Karim, IPE (BS-17) GHSS Saral Bala Dir Lower	IPE (BS-17) GHSS Zinrat Talash Dir Lower	A.V.P.
189	Mr. Asfar Ali, SS Maths (BS-17) GHSS Garhi Ghulam Shah Peshawar	SS Maths (BS-17) GHSS Tarnab Farm Peshawar	A.V.P.
190	Mr. Liaqat Ali, IPE (BS-17) GHSS Pirzadi Mardan	IPE (BS-17) GHSS Hassanzai Charsadda	A.V.P.
191	Mr. Muhammad Aszal Khan, IPE (BS-17) GHSS Usterzai Kohat	IPE (BS-17) GHSS No.1 Abbottabad	A.V.P.
192	Mr. Kamal Ud Din, Principal (BS-18) under adjustment at GHSS Harchin Chitral	Vice-Principal (BS-18) GHSS Morilash Chitral	A.V.P.
193	Mr. Shujat Ali, SS Biology (BS-17) GHSS Shawar Swat	SS Biology (BS-17) GHSS Baldara Swat	A.V.P.
194	Mr. Mehboob Khan, HMI (BS-17) GHSS Qazirpur Haripur	Vice-Principal (BS-18) GHSS Sar-e-Naimat Khan Haripur	A.V.P.

OPS?

No TADA is allowed.

Encl: of even No. & Date

SECRETARY

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar
3. District Education Officers (M), Concerned.
4. District Accounts Officers, Concerned,
5. PS to Advisor to CM for E&SE Department, Khyber Pakhtunkhwa.
6. PS to Secretary E&SE Department, Khyber Pakhtunkhwa.
7. PS to Special Secretary E&SE Department, Khyber Pakhtunkhwa.
8. Incharge EMIS E&SE Department.
9. Officers concerned.
10. Master file.

(SHABIR KHAN)  
SECTION OFFICER (SCHOOLS MALE)

JAVED IQBAL, Gul Bela  
B-10, Law Chamber  
Avenue High Court Peshawar  
Mob. 0345-9405501

JAVED IQBAL, Gul Bela  
Date: \_\_\_\_\_  
Avenue High Court Peshawar  
Mob. 0345-9405501

(P) (22)

**BEFORE THE HON'BLE PESHAWAR HIGH  
COURT, PESHAWAR.**

Am-D.

In Re W.P. \_\_\_\_\_/2019

Mir Nawaz principal of Government High School  
Kandi Zarin Khel, Hassan Khel, Sub Division  
Peshawar.

*(Petitioner)*

**VERSUS**

1. Government of Khyber Pakhtunkhwa through  
Chief Secretary of Khyber Pakhtunkhwa at Civil  
Secretariat Peshawar.
2. Chief Secretary at Civil Secretariat Peshawar.
3. Secretary, Elementary and Secondary Education  
Department, Government of Khyber  
Pakhtunkhwa at Civil Secretariat Peshawar.
4. Director Elementary and Secondary Education  
Department, Government of Khyber  
Pakhtunkhwa at Civil Secretariat Peshawar.
5. District Education Officer District Khyber (Male).

....Respondents

**PETITION UNDER ARTICLE-199 OF  
CONSTITUTION OF THE ISLAMIC  
REPUBLIC OF PAKISTAN, 1973**

**Respectfully Sheweth;**

1. That the petitioner is a naturally born  
bonafide citizen of the Islamic Republic of  
Pakistan and hails from a respectable  
family of District khyber.

JAVED IQBAL Gul Bela  
Daudzai Law Charah  
Advocate High Court Peshawar  
Mob: 0345-941554



23

2. That infact the Petitioner is an SST (BPS-17) in Elementary and Secondary Education Department Government of Khyber Pakhtunkhwa.
3. That infact the Petitioner was promoted and transfer from SST to the post of Head Master (BPS-17) against the vacant post of Head Master Government High School Musa Dara FR Peshawar (BPS-18) on his own pay and scale vide notification No. SO/Edu/SSD/FATA/5845-854 Dated 16, June 2017 in the public interest. (Copy of notification No. SO/Edu/SSD/FATA/5845-854 Dated 16, June 2017 is annexed as annexure "A")
4. That it is pertinent to mentioned here, that the Petitioner served at Government High School Musa Dara, FR Peshawar just for 3 months and then transfered to the post of "incharge principal (BPS-18) Kandi Zarin Khel FR Peshawar" in the public interest in his own pay and scale vide corrigendum No. SO/Edu/SSD/FATA/6023-033 Dated 25, July 2017. (Copy of Corrigendum No. SO/Edu/SSD/FATA/6023-033 Dated 25, July 2017 is annexed as annexure "B")

3

24

5. That it was in this back drop, that the impugned notification No.SO/(SM) E&SED/2-1/2019/Posting/Transfer/General dated.12/02/2019 was issued, whereby the Petitioner was once against transferred from Government High School Kandi Zarim Khel FR, Peshawar to Government High School Toot Qamar, District Khyber as Head master BPS-17. It is pertinent to mention here that this impugned notification of transfer had been issued after the Petitioner had served just for one year and 3 months. (Copy of impugned Notification No. SO/(SM) E&SED/2-1/2019/Posting/Transfer/General dated 12/02/2019 is annexed as annexure "C")
6. That the Petitioner has already moved an application for corrigendum of the impugned transferred order to the extent of deletion of name of the Petitioner, which order is not only pre-mature but as well as a political motivated one, rather is also against the principle of equality as detailed in article "4" and "25" of the constitution.
7. That being a persistent transferred order and politically motivated one, hence the instant writ petition under the extra

(A)

(25)

ordinary jurisdiction of this Hon'ble court  
on the following grounds inter alia:-

**Grounds:**

- A. That there exist no other expedient-cum-expeditious remedy available to the Petitioners, hence the instant petition under the extraordinary jurisdiction of this August court.
  
- B. That the petitioner is a the naturally born bonafide citizen of the Islamic Republic of Pakistan and are fully and equally, on equality basis, entitled to all basic and fundamental rights as enshrined in the fundamental law of the land, interpreted, guaranteed and enforced by the laws of the land and discrimination alongwith unfettered exercise of discriminatory powers by an authority or office is always been deplored, deprecated and depreciated by superior Courts of the land.
  
- C. That the impugned transfer order is void ab-initio, illegal, unlawful, corum non judice and is liable to be cancelled to the extent of Petitioner.

JAVED IQBAL Gul Bela  
Daudzai Law Chamber  
Advocate High Court Peshawar  
Mob: 0345-9405501

- (B)
- (26)
- D. That the impugned transfer order is certainly a politically motivated transfer order, which rendered the very impugned transfer order as void and against the well established law.
- E. That the normal tenure of any posting is 03 years, while the Petitioner has served just for round about one year and three months at Government High School Kandi Zarin khel FR Peshawar whereafter Petitioner was transferred to Government High School Toot Qamar District Khyber, which is a glaring and bold violation of transfer and posting policy of Government of Khyber Pakhtunkhwa and is a nullity in the eyes of law.
- F. That besides above, the very impugned transfer order is malicious on its very surface for the reason that in the impugned notification at serial No.6, 7, 19, 141, 170, and at serial No.194, the Head Master of BPS-17 and 18 were transferred to the post of principal of higher payscale BPS-18/19 on their own pay and scale where as the Petitioner was transferred and posted as i.e. SST (BPS-17), which is clear discrimination under the constitution of Islamic Republic of Pakistan 1973, and on this score alone the



8

27

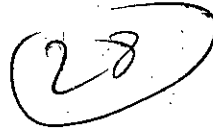
impugned notification is liable to be turned down and cancelled in the best interest of law.

G. That the Petitioner performed his duty with honesty and due to his pure devotion the peoples of the locality of Kandi Zarin Khel, praised the services of the Petitioner at Government High School Zarin Khel and the impugned notification will not only effected the rights of the Petitioner but as well as affect the people of the Kandi Zarin Khel FR Peshawar, because they will loss honest and devoted teacher from their School, hence the impugned notification is illegal, unlawful void ab-initio and be cancelled in the best interest of justice.

H. That since inducting into service, the performance of the Petitioner has remained excellent and there exists no complaint, what so ever, moved against the Petitioner and the same is reflected from his ACR's and different certificates.

I. That the Petitioner is heart cardiac and diabetic patient and it is very difficult for him to perform his duties at far flung area i.e. Toot Qamar District Khyber near Afghan/Pak border, hence the impugned transferred





notification be cancelled in the best interest of justice.

J. That from every corner, the impugned transfer order is illegal, void, and the same is liable to be set aside.

K. That any other ground not raised here may graciously be allowed to be raised at the time of arguments.

*It is, therefore, most humbly prayed that on acceptance of the instant writ petition, the impugned transfer Notification No. SO/(SM) E&SED/2-1/2019/Posting/Transfer/General dated 12/02/2019 of the office of the Secretary Elementary and secondary education department Khyber Pakhtunkhwa, may very graciously be declared as void and illegal and be set aside and cancelled just to the extent of petitioner and by doing so, the Petitioner be allowed to serve at his own place of posting i.e. principal (BS-18) Government High School Kandi zarin Khel Peshawar in his own pay and scale, in the best interest of justice.*

JAVED IQBAL Gul Bela  
Daudzai Law Chamber  
Advocate High Court Peshawar  
Mob: 664-664-664

(S)

(29)

*Any other relief not specifically asked for may also graciously be extended in favour of the petitioners in the circumstances of the case.*

**INTERIM RELIEF:**

By way of interim relief, the operation of the impugned notification No. SO/(SM) E&SED/2-1/2019/Posting/Transfer/General dated 12/02/2019 of the Secretary Elementary and Secondary Education Department Khyber Pakhtunkhwa, may graciously be suspended just to the extent of the Petitioner, till the final disposal of the instant writ petition.

**PETITIONER**

Through

**Saghir Iqbal Gulbela  
&  
Javed Iqbal Gulbela  
Advocates, High Court  
Peshawar.**

Dated: 04/03/2019

**NOTE:-**

No such like petition for the same petitioner upon the same subject matter has earlier been moved by me before this Hon'ble Court.

**Advocate.**

**LAW BOOKS:-**

1. Constitution of Islamic Republic of Pakistan, 1973.
2. Case Law according to need.

**Advocate.**

**JAVED IQBAL Gul Bela**  
Daudzai Law Chambers  
Advocate High Court Peshawar



(30)

OFFICE OF THE  
District Education Officer  
Hassan khel Sub Division Peshawar  
BLOCK: 8 NEAR INFORMATION DEPTT:  
KHYBER ROAD, PESHAWAR, K.P.K  
Phone No. 091-9210145

No. \_\_\_\_\_ Dated: 28/02/2019

To

The Additional Director Education  
Newly Merged Tribal District  
Khyber Pakhtun Khwa Peshawar

Amir Nawaz  
2

Subject:- APPEAL FOR CORRIGENDUM  
Memo:-

Enclosed please find herewith the original application submitted by Mr. Amir Nawaz I/C Principal GHS Kandi Zarin khel Hassan Khel sub Division Peshawar addressed to Chief Secretary Khyber Pakhtunkhwa Peshawar is sent for your further necessary action please.

District Education officer  
Hassan khel Sub Division  
Peshawar.

Endst; No. 6714 /

Copy for information to the:-

1. Mr. Amir Nawaz I/C Principal GHS Kandi zarin khel HSD Peshawar.

District Education officer  
Hassan khel Sub Division  
Peshawar.

JAVED IQBAL Gul Bela  
Daudza Law Chamber  
Advocate High Court Peshawar  
Mob: 0345-9495391

31A

To

The Chief Secretary,  
Khyber Pukhtun khawa Peshawar.

Through:-

District Education Officer,  
Hassan Khel Sub Division Peshawar

Subject:-


APPEAL FOR CORRIGENDUM.

Respected Sir,

With due respect and humble submission I beg to request for sympathetic consideration please. Sir, the undersigned was promoted/ adjusted at S.No.29 from SST post to HM at GHS Musa Dara FR. Peshawar, Vide Notification No.SO/EDU/SSD/FATA/5845-854, dated 16-06-2017 (copy attached Annexure-A), serving there only 03 months. Sir, then I was transferred to GHS Kandi Zarin Khel FR. Pesh. on the request of the public of community concerned to act there as in charge principal, Vide Corrigendum No.SO/EDU/SSD/FATA/6023-33, dated 25-07-2017 (Copy attached, Annexure- B) at S.No.17 and the undersigned proved their expectations true, performing his duty honestly and hardly. Sir, it is a great pleasure to say that along with my superiors, colleagues and students, the whole community is praising the services of the undersigned here in the school and it is a great reward for any Govt. servant. But inspire of these all, it is regretted that he was transferred from the said station, serving only 01 year, 06 months and 11 days to GHS Tood Qamar khyber district, hundreds mile away, with the Pak Afghan border, on plea of that the undersigned is working on wrong post (BPS-18) Vide No. SO (SM) E&SED/2-1/2019/ Posting/ Transfer/General, dt.12.2.2019 at S.No.12 (Copy attached, Annexure- C) while in the same order at S.Nos.6,7, 19, 141, 170 and 194 were transferred/adjusted on wrong posts which show injustice with the servant. Sir, Advisor to CM for E&SED KPK also has written to Sec. E&SED on a paper for his transfer, showing political victimization with the servant and then writes on order copy for reinstate him at his previous station, but in vain (Copies attached Annexure D&E). Sir, the undersigned is the heart and diabetic patient and it is very difficult for him to perform there his duty as performed in the past at his local station. Sir, at present also, a HM post is lying vacant at GHS Faridi Hassan Khel Sub Division Peshawar.

Therefore, it is requested in your good honor to look into difficulties and ailing health problems of the undersigned sympathetically and being a local and patient one, his transfer order may please be cancelled on humanitarian basis and the undersigned may please be reinstated at his previous station in the interest of community and students please OR he may please be transferred/adjusted at GHS Faridi Hassan Khel Sub Division Peshawar. I shall be grateful and thankful to you for this act of kindness and favour and will pray for your long life and future successes.

No.1457, Dated 14.02.2019

  
Yours faithfully & obediently,  
Mir Nawaz I/C Principal  
Kandi Zarin Khel, Hassan Khel  
Sub Division Peshawar.

~~JAVED IQBAL Gul Bela  
Daudzar Chamber  
Advocate High Court Peshawar  
Mob: 0345-949331~~

( 31 B )

PESHAWAR HIGH COURT, PESHAWAR.

FORM 'A'  
FORM OF ORDER SHEET

Date of Order or Proceedings	ORDER OR PROCEEDINGS WITH SIGNATURE OF JUDGE/JUDGES
1	2
28.03.2019	<p><u>WP No.1633-P/2019.</u></p> <p><b>Present:</b> Petitioner in person. Mr. Rabnawaz Khan, AAG for respondents.</p> <p>***</p> <p><b><u>IKRAMULLAH KHAN,J:-</u></b> The petitioner stated at the bar that he is victim of political victimization and continuously he is under transfer without retaining him on the post in accordance with the Posting/Transfer Policy of the Provincial Government which reads as:</p> <p>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.</p> <p>While a civil servant, feeling aggrieved due to immature transfer/posting may file an appeal or representation as the case may be in term of clause xiv of the Government Policy which reads as:</p> <p>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.</p>

**JAVED IQBAL** Gul Bela  
Daudzai Law Chamber  
Advocate High Court Peshawar  
Mob: 0345-9405501

The option of appeal against posting/transfer orders could be exercised only in the following cases.

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

The petitioner has already submitted appeal/representation to the concerned authorities on 01.03.2019, which is still pending. The respondents were bound to dispose of the appeal/representation within the prescribed period provided under the rule i.e. 15 days. But the respondents did not decide the appeal/representation within the prescribed period, therefore, the petitioner may approach the Service Tribunal against his transfer order, however, in the meanwhile status quo be maintained.

  
**JUDGE**

  
**JUDGE**

\*Ayub\* Hon'ble Mr. Justice Ikramullah Khan & Hon'ble Justice Musarrat Hilali.

**JAVED IQBAL** Gul Bela  
 Daudza Law Chamber  
 Advocate High Court Peshawar  
 Mob: 0345-9405501

قیمت 50 روپے	368-3	ایڈویکیٹ:	پشاور بار ایسوسی ایشن، خیبر پختونخواہ
		بار کونسل ایسوسی ایشن نمبر:	
		رابطہ نمبر:	

بعدالت جناب: سر جسٹس ایف بی رحمان

مخاطب: ایڈیٹریٹ	دعویٰ:
مہر نواز	علت نمبر:
بنام	مورخہ:
حکومت گلبرگ	جرم:
	تھانہ:

### بابت تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ ایڈووکیٹس آن مقام پشاور کیلئے حاجہ ویدیا امین / علیہ صنفہ اقبال / عامر / ذوالفقار کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: 10-1-2020

العبد \_\_\_\_\_ واہد العبد \_\_\_\_\_

مقام پشاور کے لیے منظور ہے۔

Accepted by

نوٹ: اس وکالت نامہ کی فونو کاپی ناقابل قبول ہوگی۔

ایڈووکیٹ: مہر نواز  
Amir



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

S.A.# 332/2020.

Mr. Mir Nawaz, Headmaster (BS-17).....Appellant.

**VERSUS**

Secretary E&SE, Govt: of Khyber Pakhtunkhwa & others.....Respondents.

**Written reply on behalf of respondents.**

**Respectfully Sheweth,**

**The Respondents submit as under:-**

**Preliminary Objections**

1. The appellant has got no cause of action/locus standi.
2. The instant Service Appeal is badly time barred.
3. The appellant has concealed the material facts from this Hon'able Tribune, hence is liable to be dismissed on this score.
4. The appellant has not come to this Hon'able Tribunal with clean hands.
5. The appellant has filed the instant appeal with malafide intension just to pressurize the Respondent for gaining illegal service benefits.
6. The present appellant is liable to be dismissed for mis-joinder & non joinder of necessary parties.
7. The instant appellant is against the prevailing law & rules.
8. The appellant is stopped by his own conduct to file the instant appellant.
9. The instant appellant is not maintainable in its present form and also in the present circumstances of the issue.
11. No Departmental Appeal has been filed before the impugned order.
12. That the appellant is not an aggrieved person under the relevant Article-212 of 1973 Constitution of Pakistan because the appellant filed the instant service appeal after lapses of considerable time.
13. That under Section-10 of Civil Servant Act, the Competent Authority is empowered to transfer a civil servant from one place to another place to meet the exigency of service on administration provided the terms and conditions of services were not adversely affected and the civil servant has no vested right to claim posting or transfer to any particular post at his choice nor he has any right to continue to hold at particular post at a particular place.

**FACTS.**

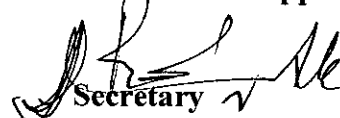
1. Para-1 relates to personal record of the appellant.
2. Para-2 pertains to service record of the appellant.
3. Correct to the extent that due to non availability of vacant post nearest to the appellant, hence on humanitarian ground the appellant was adjusted on wrong post of BS-18 on temporary basis.
4. As stated in forgoing para-3 that BS-17 are provincial cadre and the appellant is liable to serve the department in the said capacity and every civil servant falling under the ambit Section 2(b) of KP Civil Servant Act, 1973 is legally bound to serve the respondent department to the entire satisfaction of the competent authority.
5. As stated in forging para that the appellant was promoted and adjusted against wrong post of BS-18. Now due to availability of vacant post in his District Khyber, the appellant was adjusted against in his own post of Headmaster BS-17.
6. Incorrect and denied. The statement of the appellant against the facts and circumstances, the appellant has not provided any proof of political approach/ political influence. In fact, the appellant was adjusted against his own post of Headmaster BS-17.

7. That the impugned transfer order issued on 12/12/2019 (transfer order attached with service appeal at Page-N0.14) while the appellant did not filed the departmental appeal and approached the Honourable High Court and filed Writ Petition and also the same was decided on 28-03-2019. Hence the instant service appeal is not maintainable and liable to be dismissed on this score only.
8. That under Section-10 of Civil Servant Act, the Competent Authority is empowered to transfer a civil servant from one place to another place to meet the exigency of service on administration provided the terms and conditions of services were not adversely affected and the civil servant has no vested right to claim posting or transfer to any particular post at his choice nor he has any right to continue to hold a particular post at a particular place, hence the instant service appeal is liable to be dismissed inter alia on the following grounds.

**GROUNDS.**

- A. Incorrect and not admitted. The appellant has been treated in accordance with law and rules on the subject and no rights of the appellant has been violated.
- B. Incorrect as already explained in para above.
- C. Incorrect. The appellant was treated as per law and policy.
- D. The statement of the appellant in this para is false baseless, against the facts and record. In fact the appellant was working against wrong post of BS-18 and was adjusted against his original post of Headmaster BS-17.
- E. Incorrect and not admitted. The statement of the appellant in this para is false, against the facts and materials on record and against the law, rules on subject, hence denied.
- F. Incorrect as already explained in forgoing para.
- G. Incorrect as already explained in forgoing para.
- H. That the appellant may be forwarded his retirement case to Medical Board, if he do not perform his normal duty and waste the precious time of innocent children.
- I. That the appellant did not file the Service appeal in statutory period, hence the instant Service Appeal may be dismissed being time barred.
- J. That the respondents also seek permission of this Honourable Court to add more grounds and proofs at the hearing of this appeal.

**In view of the above made submissions, it is, therefore, most humbly prayed that this Honourable Tribunal may very graciously be pleased to dismiss the appeal.**

  
Secretary

**Elementary & Secondary Education Department.**