

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No. 1342/2019

Date of Institution ... 11.10.2019

Date of Decision ... 16.10.2019

Mr. Abid Khan son of Khanzada R/O Ziarat Bela, Tehsil Ghazi, District Haripur  
Chowkidar, Government Primary School, Ziat Bela, Haripur. . . . . (Appellant)

VERSUS

The District Education Officer (Male) District Haripur and four others.  
... (Respondents)

Mr. Khan Zada Khan,  
Advocate. ... For appellant

MR. HAMID FAROOQ DURRANI, ... CHAIRMAN

JUDGMENT

HAMID FAROOQ DURRANI, CHAIRMAN:-

1. The appellant is aggrieved of office orders dated 02.09.2019 and 02.10.2019 issued by respondent No. 1/District Education Officer (Male) District Haripur. Through the former he was transferred from Government Primary School Ziarat Bala to Government Primary School, Kali Kundi while, by virtue of later order, the appellant was readjusted in Government Middle School Ziarat Bala.
2. Learned counsel for the appellant heard and available record gone through.
3. The appellant was performing duty as Chowkidar at GPS Ziarat Bala when he was transferred to GPS Kali Kundi on 02.09.2019. A departmental appeal was submitted by the appellant to respondent No. 2 who required the relevant authority to resolve the issue as per rules/policies. On 02.10.2019, an order was issued



whereby the appellant, who was under transfer to GPS Kali Kundi, Haripur was adjusted in G.M.S Ziarat Bala.

The impugned order dated 02.09.2019 was superseded by order dated 02.10.2019, against which no departmental appeal was submitted by the appellant. The appeal in hand is, therefore, premature to that extent. Secondly, through the order the appellant was adjusted back at Ziarat Bala but in a Government Middle School. The appellant, however, appears to have remained adamant for adjustment in a school of his choice i.e. Government Primary School Ziarat Bala which is not allowable under the rules.

4. In view of the above, the appeal in hand being meritless is hereby dismissed in limine. The appellant shall not, however, be precluded from pursuing departmental remedy against the order dated 02.10.2019, in accordance with law.

File be consigned to the record room.




(HAMID FAROOQ DURRANI)  
CHAIRMAN

ANNOUNCED  
16.10.2019

Form-A  
FORM OF ORDERSHEET

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

Case No. 1342/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	14/10/2019	<p style="text-align: center;">As per direction of the Worthy Chairman this case is submitted to the S. Bench for preliminary hearing along with office objection. To be put up there on <u>16/10/19</u>.</p> <p style="text-align: right;"> REGISTRAR <u>14/10/19</u></p>

This is an appeal filed by Mr. Abid Khan today on 11/10/2019 against the order dated 02-09-2019 against which he preferred/made departmental appeal/ representation on 01.10.2019 the period of ninety days is not yet lapsed as per section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, which is premature as laid down in an authority reported as 2005-SCMR-890.

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

No. 1731 /ST,

Dt. 11/10 /2019

11/10/19  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Khan Zada Khan Adv. Pesh.

R/Sri

It is humbly stated that:-

the departmental appeal filed by the appellant on dated 1<sup>10</sup>/<sub>19</sub> (annexure F, P-16) was disposed of by the Respd. NO 2 on the same date i.e. 1<sup>10</sup>/<sub>19</sub> with the direction to R/NOI (DEO) to resolve the issue immediately. Meaning thereby that the departmental appeal has been disposed of / decided by the appellate authority i.e. R/NO 2 but thereafter the direction given by the R/NO 2 to R/NOF was not properly complied with.

Hence, the dept. appeal in the given circumstances and the inst. service appeal is not pre-mature. May kindly be put-up before the honourable bench.

Adv.  
14/10/19

Sir,

The objection of this office and reply  
of counsel from the appellant is submitted  
for order please.

                      
14/10/19

~~Handily chain - on~~

Let it be laid before SB for PM  
alongwith office objection.

                      
14/10

**BEFORE THE SERVICES TRIBUNAL, KPK, PESHAWAR**

Service Appeal No. 1342 /2019

Abid Khan.....**Appellant**

**V E R S U S**

The District Education Officer (Male),  
District Haripur and others.....**Respondents**

**I N D E X**

S.No	Description of Documents	Annex	Pages
1.	Service appeal alongwith affidavit		1-5
2.	Application for suspension with affidavit		6-7
3.	Addresses of parties		8
4.	Copy of CNIC of appellant	A	9
5.	Copy of appointment order dt.29.06.2019	B	10-11
6.	Copy of Charge Report 29/6/2019	C	12
7.	Copies of orders dated 24.08.2019 and 02.09.2019	D-E	13-15
8.	Copy of departmental appeal dt.01.10.2019	F	16
9.	Copy of order dated 02.10.2019	G	17
10.	Copies of letters of Incharge GPS Kali kundi /GMS Ziayart Bella	H-I	18-19

عابد خان

Applicant/ Appellant

Through



**Khan Zada Khan**

Advocate High Court

Cell: 0345-9292002

Date: 11 / 10 / 2019

**BEFORE THE SERVICES TRIBUNAL, KPK, PESHAWAR**

Service Appeal No. 1342 /2019

**Khyber Pakhtunkhwa  
Service Tribunal**


Diary No. 1442

Dated 11-10-2019

Abid Khan S/o Khanzada  
R/o Ziarat Bela, Tehsil Ghazi, District Haripur  
Chowkidar, Govt Primary School, Ziarat Bela,  
Tehsil Ghazi, District Haripur (**Under Transfer**).....**Appellant**

**V E R S U S**

1. The District Education Officer (Male),  
District Haripur.
2. The Director,  
Elementary & Secondary Education, KPK,  
G.T.Road, Peshawar.
3. The Secretary Education,  
Elementary & Secondary Education, KPK,  
Civil Secretariat, Peshawar.
4. The Government of KPK through Advocate General.
5. Muhammad Arif S/o Gulbahar Khan  
Chowkidar, Govt Primary School, Ziarat Bela,  
Tehsil Ghazi, District Haripur.....**Respondents**

**Filed to-day**  
  
**Registrar**  
11/10/19

**Service appeal u/s 4 of the Khyber  
Pakhtunkhwa Services Tribunal Act, 1974  
against the impugned order dated  
02.09.2019 of respondent No.1, wherein  
the appellant has been transferred from  
Govt Primary School, Ziarat Bela to Govt  
Primary School, Kali Kundi, which is  
illegal, against the law and facts, based**

**on malafide and political motivation.  
Hence, untenable and liable to be set  
aside.**

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**Respectfully Sheweth:**

1. That the appellant is permanent and bonafide resident of Village Ziarat Bela, Tehsil Ghazi, District Haripur. (Copy of CNIC of appellant is attached as Annexure "A").
2. That on dated 29.06.2019, the appellant alongwith others, was appointed as Class-IV / Chowkidar against the vacant post and posted at Government Primary School, Ziarat Bela, Tehsil Ghazi, District Haripur. (Copy of appointment order dated 29.06.2019 is attached as Annexure "B").
3. That the appellant submitted his Charge Report on the same date and started his duty whole-heartedly, committedly and to the entire satisfaction of his high-ups. (Copy of charge report is attached as Annexure "C").
4. That it is pertinent to mention here that, on dated 24.08.2019, the respondent No.5 namely Muhammad Arif was also appointed as Chowkidar and posted at GPS, Ziarat Bela and subsequently on dated 02.09.2019, the appellant was transferred from GPS, Ziarat Bela to GPS, Kali Kundi, Tehsil Ghazi, District Haripur. (Copies of orders dated 24.08.2019 and 02.09.2019 are attached as Annexure "D" & "E").



5. That thereafter on dated 01.10.2019, the appellant filed departmental appeal before the respondent No.2, which was disposed-of on the same day i.e. 01.10.2019 with the direction to the respondent No.1 to "**resolve the issue as per rules/ policy immediately, please**". (Copy of departmental appeal dated 01.10.2019 is attached as Annexure "F").
6. That just after one day on dated 02.10.2019, the respondent No.1 instead of proper consideration of the departmental appeal and cancellation of the impugned order dated 02.09.2019, issued another order wherein the appellant was adjusted at GMS, Ziarat Bela, Tehsil Ghazi, District Haripur. (Copy of the order dated 02.10.2019 is attached as Annexure "G").
7. That it is very pertinent to mention here that, as per information received from the Incharge of both the said schools i.e. GPS Kali Kundi and GMS Ziarat Bela, the post of Chowkidar is not available, hence, the appellant has been made rolling stone due to the above-said illegal act and abuse of authority of the respondent no 1. ( copies attached as annexure H & I respectively )
8. That feeling aggrieved and having no other available remedy, the appellant approached this Hon'ble Tribunal for redressal of his grievances, inter alia, on the following grounds:

**G R O U N D S:**

- A. The appellant has come to this Hon'ble Tribunal with clean hands.

- B. The impugned order passed by respondent No.1, is ineffective and inoperative upon the rights of appellant and is not sustainable.
- C. The impugned order dated 02.09.2019 has been issued just after three months, is premature, before the expiry of statutory tenure and based on malafide as well as politically motivated, which is clear from the language of order dated 02.10.2019.
- D. Any other ground will be raised at the time of arguments, with kind permission of this Honourable Tribunal.

It is, therefore, most humbly prayed that on acceptance of the instant service appeal, the impugned order dated 02.09.2019 and subsequent order dated 02.10.2019 passed by respondent No.1 may kindly be set aside and the appellant may very graciously be allowed to perform his duties at Govt Primary School, Ziarat Bela, Tehsil Ghazi, District Haripur.

Any other remedy which deems fit by this Honourable Tribunal may also be granted in favour of appellant.

Through Khan Zada Khan  
Advocate High Court

Appellant



Date: 11/10/2019

**BEFORE THE SERVICES TRIBUNAL, KPK, PESHAWAR**

Service Appeal No. \_\_\_\_\_/2019

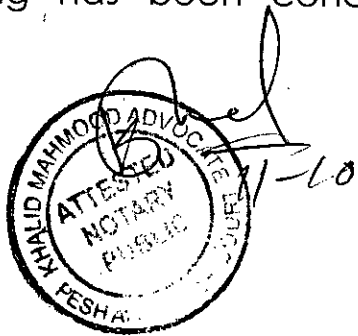
Abid Khan.....**Appellant**

**VERSUS**

The District Education Officer (Male),  
District Haripur and others.....**Respondents**

**AFFIDAVIT**

I, Abid Khan S/o Khanzada R/o Ziarat Bela, Tehsil Ghazi, District Haripur (Chowkidar, Govt Primary School, Ziarat Bela, Tehsil Ghazi, District Haripur) do hereby solemnly affirm and declare on oath that the contents of accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

  
19



  
**DEPONENT**

**BEFORE THE SERVICES TRIBUNAL, KPK, PESHAWAR**

Service Appeal No. \_\_\_\_\_/2019

Abid Khan.....**Applicant/ Appellant**

**V E R S U S**

The District Education Officer (Male),  
District Haripur and others.....**Respondents**

**Application for suspension of the operation  
of impugned transfer order dated 02.09.2019  
and subsequent order dated 02.10.2019  
passed by respondent No.1, till the final  
decision of the instant service appeal.**

**Respectfully Sheweth:**

1. That the titled service appeal is filed before this Hon'ble Tribunal, in which no date of hearing has yet been fixed.
2. That the applicant/ appellant has got a good prima facie case in his favour, and is sanguine about its success.
3. That the balance of convenience also lies in favour of the applicant/ appellant for the grant of interim relief.

- 4. That if the impugned transfer orders dated 02.09.2019 and subsequent order dated 02.10.2019 are not suspended, the applicant / appellant would suffer irreparable loss.
- 5. That the facts and grounds of the accompanying service appeal may kindly be read as an integral part of this application.

It is, therefore, respectfully prayed that on acceptance of this application, the operation of impugned transfer order dated 02.09.2019 and subsequent order dated 02.10.2019 may kindly be suspended, till the final decision of the instant service appeal.

Applicant/ Appellant

Through

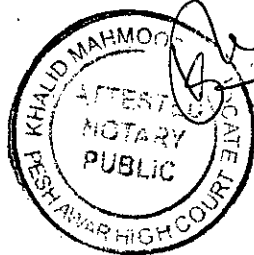


**Khan Zada Khan**  
Advocate High Court

Date: 11/10/2019

**AFFIDAVIT:**

It is stated on oath that the contents of **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.



11-10-19  
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**DEPONENT**

**BEFORE THE SERVICES TRIBUNAL, KPK, PESHAWAR**

Service Appeal No. \_\_\_\_\_/2019

Abid Khan.....Appellant

**V E R S U S**

The District Education Officer (Male),  
District Haripur and others.....Respondents

**ADDRESSES OF PARTIES**

**APPELLANT**

Abid Khan S/o Khanzada  
R/o Ziarat Bela, Tehsil Ghazi, District Haripur  
Chowkidar, Govt Primary School, Ziarat Bela,  
Tehsil Ghazi, District Haripur

**RESPONDENTS**

1. The District Education Officer (Male),  
District Haripur.
2. The Director,  
Elementary & Secondary Education, KPK,  
G.T.Road, Peshawar.
3. The Secretary Education,  
Elementary & Secondary Education, KPK,  
Civil Secretariat, Peshawar.
4. The Government of KPK through Advocate General.
5. Muhammad Arif S/o Gulbahar Khan  
Chowkidar, Govt Primary School, Ziarat Bela,  
Tehsil Ghazi, District Haripur

Through  

 ۱۱۱۱  
 Appellant  


**Khan Zada Khan**  
Advocate High Court

Date: 11 / 10 / 2019

9-A

حکومت پاکستان

کوی شہنشاہی کراچی

5-2154521-754301



نام: حاجی محمد

پتہ: راج

وہا کانسٹیبل پوسٹ ٹاؤن

دہلی ایسٹ ڈسٹرکٹ

15/03/1995

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محمد طارق ملک

دستور جسٹس

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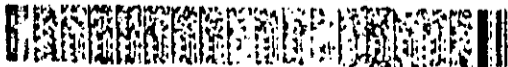
تلفون نمبر: 5-7545216-1330 33375P

موجودہ پتہ: ٹوبہ ٹیکر، ڈاک خانہ، کراچی۔  
پتہ: ٹوبہ ٹیکر، ڈاک خانہ، کراچی۔

تاریخ: 05/09/2013

تاریخ: 05/09/2013

تاریخ: 05/09/2013







OFFICE OF THE DISTRICT EDUCATION OFFICER (M)

HARIPUR

Ph. No. 0995-610178, 610268

Email: [deomalchro@gmail.com](mailto:deomalchro@gmail.com)



B

10

APPOINTMENT ORDER:

Consequent upon the approval of the Departmental Selection Committee, in its meeting held on 20-06-2019, the appointments of following C-IV candidates are hereby ordered in BPS-03 (9610-390-21310) plus usual allowances as admissible to them under the rules on regular basis against the C-IVs Servant Posts in the Male Schools of District Haripur noted against their Names on terms & conditions given below in the interest of public service with effect from 01-07-2019 and onward the date of taking over their charge.

75 % Open merit PK-42 (S.No.1 to 23)

S. No	Name of Candidate	Father's Name	Date of Birth	Address of Candidates	Name of School where Posted	Remarks
1	Muhammad Hashim	Ali Sarwar	21-08-1994	Chakli	GPS Chakli	A.V. Post of Chowkidar
2	Iftikhar Ahmed	Liaqat Zaman	02-01-1982	Dhab Dheri	GPS Dhab Dheri	A.V. Post of Chowkidar
3	Muhammad Sajjad	Muhammad Nawaz	01-01-2000	Sarri	GHS Sarri	A.V Post of Sweeper
4	Rafaqat Zaman	Muhammad Zaman	15-03-1980	Dhenda	GHS Dhendah	A.V Post of N/Qasid
5	Tayyab Ali	Abid Ali	20-03-1990	Khair Bara	GMS Khair Bara	A.V Post of N/Qasid
6	Asif Khan	Fazal e Qadir	20-12-1985	Khair Bara	GMS Khair Bara	A.V Post of Sweeper
7	Asim Khan	Haider Zaman	31-03-1997	Chumiarai	GPS Chumiarai	A.V. Post of Chowkidar
8	Mehrban Hussain Shah	Ibrar Hussain Shah	24-03-1997	Jahamra	GHSS Jahamra	A.V Post of N/Qasid
9	Malik Awais	Muhammad Shoab	26-06-1995	Makhna	GPS Makhna Village	A.V. Post of Chowkidar
10	Nisar Ahmed	Fazal Ahmed	01-12-1983	Dobandi	GHS Dobandi	A.V Post of N/Qasid
11	Ashraf Khan	Atim Khan	01-01-1988	Zahida Amazai	GPS Zahida Amazai	A.V. Post of Chowkidar
12	Baber Yousaf	Muhammad Yousaf	08-08-1988	Kangra Colony Haripur	GHS Kangra Colony	A.V Post of Lab Attended
13	Adil Naseem	Muhammad Naseem	28-02-1988	Hassanpur	GPS Hassanpur	A.V. Post of Chowkidar
14	Alisan Khan	Muhammad Saleem	22-01-1994	Dheri Naqarchian	GHS Dheri Naqarchian	A.V. Post of Chowkidar
15	Muhammad Khalid	Muhammad Shah	10-08-1981	Phulwari	GPS Shah Patti	A.V. Post of Chowkidar

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	Awais Khan	Muhammad Nawaz	28-03-1992	Sec. I KTS	GCMHSS T.T Ship	A.V Post of N/Qasid
17	Abid Ali	Muhammad Fareed Khan	1982	Sec. I KTS	GCMHSS T.T Ship	A.V Post of Behshti
18	Waqas Ahmed	Riaz ur Rehman	1991	Sec. I KTS	GCMHSS T.T Ship	A.V Post of Lab Attended
19	Azhar Hussain	Fazal Hussain	01-06-1997	Sherawal Kundi	GHS Kundi	A.V Post of Lab Attended
20	Naveed Khan	Hakim Khan	20-04-1991	Bait Galli	GHS Bait Galli	A.V. Post of Chowkidar
21	Hassan Mehmood	Gul Zeb	08-03-1993	Kundi	GHS Kundi	A.V Post of Behshti
22	Abid Khan	Khazada	15-03-1995	Ziarat Bela	GPS Ziarat Bela	A.V. Post of Chowkidar
23	Umer Ayub	Mosa Khan	09-06-1993	Mohallah Sherazi Gherkhan Road Pandak	GCMHSS No. I Haripur	A.V. Post of Cook

**TERMS & CONDITIONS.**

1. Their services will be considered as regular and they will be entitled to gratuity and pension etc as per existing rules.
2. They will get pay i.e. initial pay of BPS-03 of the post including usual allowances as admissible under the rules.
3. Their services can be terminated at any time, in case their performance is found unsatisfactory.
4. In case of misconduct they will be proceeded under Efficiency & Discipline Rules 2011, and rules framed from time to time by Govt.
5. If they want to resign from the service, they will have to serve one month prior notice, failing which they will have to deposit one month pay in lieu of such notice, in the Govt. treasury.
6. They should join their post within 15 days of issuance of this order.
7. They will bound to produce Health & Age certificate issued by the Medical Superintendent: DHQ Haripur within 07 days of taking over charge, in case of 1st: appt: in this Department.
8. Charge Reports should be submitted to all concerned.
9. No TA / DA are allowed.

-----sd-----  
 District Education Officer (Male)  
 Haripur.  
 Dated: 29-06-2019.

Endst: No. 4802-4820/Apptt/Class IV Case:

Copy of the above is submitted for information to the:-

1. The Senior District Accounts Officer Haripur.
2. The Manager Employment Exchange KTS Haripur.
3. PA to Director Elementary & Secondary Education KPK Peshawar.
4. PA to Deputy Commissioner Haripur.
5. The Principals/ Head Masters of the concerned Schools.
6. SDEO (M) Haripur & Khanpur.
7. Candidates concerned.
8. Officer record file.

Assistant District Education Officer (Male)  
 Establishment Haripur:

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 29/06/2019

*Handwritten initials:*  
 CSU  
 Haripur

صفحہ (12) چارج رپورٹ

میں سے فائدہ خان ولد خان زان جو کہ ادارہ سے گنڈا بازار میں

گورنمنٹ پرائمری سکول زیارت پیدلے آرڈر از دفتر

DFC سب سوانہ پرائمری سکول زیارت پیدلے تحصیل

غازی ضلع ہری پور آرڈر نمبر 11/PPD/4820-4802

بتاریخ 29/6/2019 سرینامہ کے تحت آج مورف

29/6/2019 لیدر دوپہر گورنمنٹ پرائمری سکول زیارت پیدلے

میں رہنے عہدہ کا چارج لے لیا ہے

چارج رپورٹ ارسال خدمت ہے

دستخط چارج سکرپٹر

فائدہ خان

دستخط چارج ذمہ دار

Atal

29/6/2019

Head teacher  
G.P.S. Ziaat Bela  
(Haripur)

CTC  
Mudra



OFFICE OF THE DISTRICT EDUCATION OFFICER (M)

HARIPUR

Ph. No. 0995-610178, 610268

Email: deomatehrp@gmail.com



D

APPOINTMENT ORDER:

13

Consequent upon the approval of the Departmental Selection Committee, in its meeting held on 23-08-2019, the appointments of following C-IV candidates are hereby ordered in BPS-03 (9610-390-21310) plus usual allowances as admissible to them under the rules on regular basis against the C-IVs Servant Posts in the Male Schools of District Haripur noted against their Names on terms & conditions given below in the interest of public service with effect from 01-09-2019 and onward the date of taking over their charge

75 % Open merit (S.No.1 to 10)

S. No.	Name of Candidate / Father Name	Address of Candidates	Date of Birth	Post/ Name of School Where Posted	Remarks
01.	Rizwan Ullah Khan S/O Zakariya Khan	Koka Rehana	15-03-2001	Chowkidar GPS Rehana	Against Vacant Post
02.	Rasheed Mehmood S/O Muhammad Afzal	Nelore Maira	14-02-1979	Chowkidar GPS Maira Karam Sher	Against Vacant Post
03.	Safeer Ahmed S/O Shakeel Ahmed	Kanikot	03-03-1991	Chowkidar GPS Sajipur	Against Vacant Post
04.	Khalid Hussain Shah S/O Maqsoom Hassan Shah	Village Tial	14-12-1984	Chowkidar GPS Tial	Against Vacant Post
05.	Muhammad Umer S/O Sher Azam	Village Karwala	18-03-1998	Chowkidar GPS Karwala	Against Vacant Post
06.	Ahsan Mehmood S/O Shoukat	Mohri Kahoo	15-02-1999	Chowkidar GPS Mohri Kahoo	Against Vacant Post
07.	Waqas Ahmed S/O Javed	Village Hattar	01-03-1992	Naib Qasid GHS Shadi	Against Vacant Post
08.	Qaiser Khan S/O Mushraf Zaman	Village Khoi Kaman	31-03-1988	Chowkidar GPS Khoi Kaman	Against Vacant Post
09.	Muhammad Arif S/O Gulbhar Khan	Village Ziarat Bela	08-12-1998	Chowkidar GPS Ziarat Bela	Against Vacant Post
10.	Muhammad Qasim S/O Muhammad Zaman	Village Besak Haripur	05-02-1993	Chowkidar GPS Besak	Against Vacant Post

25 % Retired Son Quota (S.No.1 to 03)

01.	Ishahn ur Rehman S/O Mehrban Khan	Kupri	15/07/1982	Chowkidar GPS Kohala Bala	Against Vacant Post
02.	Samiullah S/O Shafiq Zaman	Gerhan Sirikote	30/03/1986	Chowkidar GPS Sherawal	Against Vacant Post court case
03.	Nadir Nawaz S/O Muhammad Nawaz	Darweshi	14/08/1996	Lab Attendant GHS Pakshahi	Against Vacant Post

P.T.O

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TERMS & CONDITIONS.

1. Their services will be considered as regular and they will be entitled to gratuity and pension etc as per existing rules.
2. They will get pay i.e. initial pay of BPS-03 of the post including usual allowances as admissible under the rules.
3. Their services can be terminated at any time, in case their performance is found unsatisfactory.
4. In case of misconduct they will be proceeded under Efficiency & Discipline Rules 2011, and rules framed from time to time by Govt.
5. If they want to resign from the service, they will have to serve one-month prior notice, failing which they will have to deposit one month pay in lieu of such notice, in the Govt treasury.
6. They should join their post within 15 days of issuance of this order.
7. They will bound to produce Health & Age certificate issued by the Medical Superintendent: DHQ Haripur within 07 days of taking over charge, in case of 1st: apptt: in this Department.
8. Charge Reports should be submitted to all concerned.
9. No TA / DA are allowed.

-----sd-----

District Education Officer (Male)

Haripur.

Dated: 24/08/2019.

Endst: No. 6338-45 /Apptt/Class IV. Case:

Copy of the above is submitted for information to the:-

1. The Senior District Accounts Officer Haripur.
2. The Manager Employment Exchange KTS Haripur.
3. PA to Director Elementary & Secondary Education KPK Peshawar.
4. PA to Deputy Commissioner Haripur.
5. The Principals/ Head Masters of the concerned Schools.
6. SDEO (M) Haripur & Khanpur and Ghazi
7. Candidates concerned.
8. Officer record file.

Assistant District Education Officer  
Establishment Haripur.

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OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)  
HARIPUR

PH No. 0995-920151  
deomalehrp@education.com

E

(15)

**Office Order:-**

The following transfer/adjustment of non teaching staff of E&SE Department Haripur are hereby made on their own pay & grade in the best interest of public service with immediate effect.

S. No	Name of Teacher/Designation	Adjustment		Remarks
		From	To	
1	Abid Khan Chow:	GPS Zariat Bala	GPS Kali Kundi	Against Vacant post
2	Darwash Khan C-IV	GHSS Nara Amazi	GMS No 4 HR	Against Vacant Post
3	Tariq Mehmood Chow:	GPS Jatti Pind	GPS No 4 Hr	Against Vacant Post
4	Alam Zab L/A	GHS Pakashi	GHS Kharian	Against Vacant Post

**Note:-**

1. No TA/DA is allowed.
2. Charge Report Should is submitted to all concerned.

.....sd/.....

District Education Officer (M)  
Haripur

Endst: No. 6516-29 F.No.5-2/G.B/

Dated Haripur the 02/09/2019.

**Copy for information to:-**

1. The District Accounts officer Haripur
2. The Principal /Headmaster concerned.
3. The SDEO (M) concerned.
5. The EMIS Branch Local Office.
6. Office Record File.

Assistant District Education Officer (M)  
Establishment Haripur.

Handwritten signature/initials

بجھور جناب ڈائریکٹر صاحب ایلمنٹری اینڈ سیکنڈری ایجوکیشن پشاور

"F"  
16

جناب عالی!

گزارش ہے کہ سائل کا نام عابد خان ولد خانزادہ ساکن زیارت بیلہ تحصیل غازی ڈسٹرکٹ ہری پور کا رہائشی ہوں۔ سائل آپ سے گزارش کرتا ہے کہ سائل کے والد صاحب نے اپنی ذاتی جگہ (پرائمری سکول زیارت بیلہ) سے سکول کیلئے جگہ فی سبیل اللہ دی تھی۔

اور سائل کا آرڈر مورخہ 29/06/2019 کو سائل کا آرڈر سکول ہذا میں بطور چوکیدار ہوا تھا۔ اسکے بعد سکول ہذا میں 24/08/2019 کو ایک اور بندے کا اس خالی پوسٹ پر آرڈر کر دیا ہے جبکہ سائل 24/08/2019 کو ڈیوٹی پر تھا۔ اور سائل کا ٹرانسفر 02/09/2019 کو گاؤں سے کالی کنڈی میں کر دیا گیا۔

وہاں جا کر معلوم ہوا کہ وہاں قبل ازیں چوکیدار تعینات اپنی ڈیوٹی سرانجام دے رہا ہے اور ادھر کوئی پوسٹ خالی نہیں۔ سائل کو ہوا میں لٹکا کر چھوڑ دیا، سائل سے چارج رپورٹ پولیس کے ذریعے زبردستی لی گئی۔

جناب عالی! سائل آپ کو بتانا چاہتا ہے کہ سائل کے ساتھ نا انصافی ہوئی ہے۔ سائل ایک غریب شخص ہے۔ سائل کو انصاف دیا جائے۔ سائل کو سکول ہذا میں تعیناتی کا حکم دیا جائے تاکہ سائل اپنی ڈیوٹی احسن طریقے سے سرانجام دے سکے۔

المرقوم: 01 اکتوبر 2019

ارض

DEO (M) Haripur

Resolve the issue as per rules/policy immediately please.

والد خان  
سائل: عابد خان ولد خانزادہ

ساکن: زیارت بیلہ تحصیل غازی ضلع ہری پور

رابطہ نمبر: 0342-1944817

*(Handwritten signature)*

*(Handwritten signature)*

11/09/19



**OFFICE OF THE DISTRICT EDUCATION OFFICER (M)**

**HARIPUR**

Ph. No. 0995-920150, 920151, 920152

Email: [deomalehrp@yahoo.com](mailto:deomalehrp@yahoo.com)



**Staff Gap Arrangement Order:**

Consequent upon the approval by the competent authority that Mr. Abid Khan Chow: GPS Zariat Bala under transfer GPS Kali Kundi Haripur is hereby adjusted in the GMS Zariat Bala on staff gap arrangement being local dispute (Law and order situation) in the best interest of public service with immediate effect

**Note:**

1. Charge Report Should be submitted to all concerned.
2. No TA/DA & TG is allowed.

-----Sd/-----

**District Education Officer (Male)  
Haripur**

Endst: No. 8321-23 /F. No.3-4/

Dated: 02 /10/2019.

**Copy for information to:**

1. The District Monitoring Officer Haripur.
2. The Headmaster GMS Zariat Bala Haripur.
3. SDEO(M) Ghazi Haripur.
4. DMO Haripur
5. Office record file.

*[Handwritten signature and date: 02/10/2019]*

**Assistant District Education Officer (Male)  
Haripur**

*[Handwritten signature]*

*[Handwritten signature]*



صوبہ کی طرف سے (18) "H"  
ہجرت کی سہولت کے لئے درخواستیں منظور کرنے کے لئے  
ممبرانہ کمیٹی کے ذریعہ

Chairman P.T.C.  
Govt. Primary School  
Kaly. Kundi (Haripur)

صوبہ کی طرف سے  
HEAD TEACHER  
Government Primary School.  
Kali Kundi

# CHARGE REPORT

It is certify That Mr. ABID Khan S/O KHAN ZADA

(19)

"I"

Taken over charge of chowkidar on This day  
03-10-2019 fore noon but there is no vacant

Post nor sanctioned Post of chowkidar here at  
GMS Ziarat Bela but you will perform your  
duties here because o for the best interest  
of the public and due to law and order

situation, ~~so~~ against order NO: 8321-23 Dated 02/10/19

By DEO (M) Haripur.

Signature of  
Taken over  
charge

copy To:

DEO (M) HARIPUR

DAO (M) Haripur

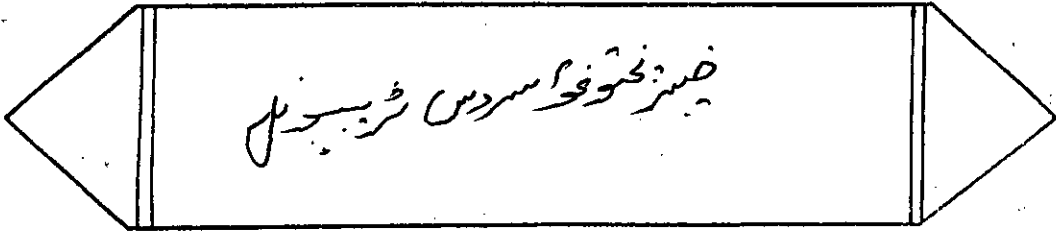
office file

Head Master  
GMS Ziarat Bela

Haripur

Head Master  
GMS  
Ziarat Bela

## بعدالت



خیز خٹو سردس شریسہ

2019ء پنجاب ایبلانٹ

بنام شریسہ شریسہ

عابد رضا

موزنہ 11-10-19

مقدمہ

دعویٰ سروس

جرم

آفسر ہری پور وغیرہ

### باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ

آن مقام پشاور کیلئے خانزادہ خٹو کے پیش رو کے

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور صولی چیک دروپیا عرضی دعویٰ اور درخواست ہر قسم کی تصدیق زرائیں پر دستخط کرانے 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 اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بااختیارات حاصل ہوں گے اور اس کا ساختہ پروا خستہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جائہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

المرقوم 11/10/2019ء ماہ 2019ء

واہ العبد

کے لئے منظور ہے۔

بمقام پشاور