

Sr. No	Date of order/proceedings	Order or other proceedings with signature of Judge or Magistrate
1	2	3
	29.11.2019	<p style="text-align: center;"><u>BEFORE THE YBER PAKHTUNKHWA SERVICE TRIBUNAL</u> Service Appeal No. 719/2018</p> <p style="text-align: center;">Date of Institution 11.06.2019 Date of Decision 29.11.2019</p> <p>Mr. Sher Bahadur son of Mewa Hassan, SS (English) Government Higher Secondary School Spin Dand, District Khyber.</p> <p style="text-align: right;">Appellant</p> <p style="text-align: center;">Versus</p> <ol style="list-style-type: none"> 1. The Secretary to Government of Khyber Pakhtunkhwa Elementary & Secondary Education, Peshawar. 2. The Director Education newly merged Tribal Districts Khyber Pakhtunkhwa Peshawar. 3. District Education Officer, District Khyber. 4. Mr. Nasrullah son of Mumtaz Khan, Government Higher Secondary School No.1 Jamrod (Government Shaheed Abdul Azam Afridi Higher Secondary School) District Khyber. <p style="text-align: right;">Respondents</p> <p>Mr. Muhammad Hamid Mughal -----Member(J) Mr. Ahmad Hassan-----Member(E)</p> <p style="text-align: center;"><u>JUDGMENT</u> <u>MUHAMMAD HAMID MUGHAL, MEMBER:</u> Appellant</p> <p>with counsel present. Mr. Kabir Ullah Khattak learned Additional Advocate General for official respondents present. Private respondent No.4 with counsel present.</p> <p>2. The appellant (S.S English) has filed the present service appeal being aggrieved against the order dated 12.02.2019 in</p>

29.11.2019

relation to transfer of Mr. Nasrullah (private respondent No.4) from GHSS Spin Dand District Khyber to GHSS No.1 Jamrod District Khyber. Prayer of the appellant is that the impugned order in relation to private respondent No.4 may be declared null and void and the appellant may be transferred/adjusted against the vacant post of S.S English in GHSS No.1 Jamrod District Khyber.

3. Learned counsel for the appellant argued that the appellant was posted at GHSS Spin Dand District Khyber vide order dated 22.06.2018 however the appellant was given charge of wrong post i.e S.S Economics instead of S.S English; that the post of S.S English was vacated in GHSS No.1 Jamrod District Khyber and the appellant applied for the said post at the offices of respondents however in his stead, private respondent No.4 was adjusted at the post of S.S English GHSS No.1 Jamrod District Khyber; that the private respondent is non-local while the appellant is domicile holder of District Khyber, more so wife of the appellant is a teacher i.e. PSHT and posted at District Khyber, hence the posting of private respondent No.4 instead of the appellant at GHSS No.1 Jamrod District Khyber is illegal and unwarranted.

4. As against that learned AAG assisted by learned counsel for the private respondent No.4 argued that the S.S post is not a district cadre post rather a provincial cadre post; that under Section-10 of the Khyber Pakhtunkhwa Civil Servants Act 1973, the appellant is liable to serve anywhere in the province; that a civil servant has no right to claim posting of his choice; that the impugned order was

29.11.2019

issued in the public interest.

5. Arguments heard. File perused.

6. The appellant who was posted at GHSS Spin Dand District Khyber vide order dated 22.06.2018, seeks his transfer and posting at GHSS No.1 Jamrod District Khyber. There is no cavil to the proposition that civil servant has no right of choice posting. Private respondent No.4 in his comments has also averred that the appellant is residing at Peshawar with his family and not in District Khyber. Both the appellant and her spouse are serving in the same district. Learned counsel for the appellant could not demonstrate that the impugned posting transfer order in relation to the private respondent No.4 was issued to accommodate blue eyed person or is otherwise actuated with malice.

7. In view of above, the appellant has not been able to seek indulgence of this Tribunal. Consequently the present service appeal is hereby dismissed. Without affecting the rights of other teachers, the appellant, upon completion of his normal tenure, may approach the respondent department through departmental appeal for his transfer posting at a suitable school. Parties are left to bear their own costs. File be consigned to the record room.



(Ahmad Hassan)
Member

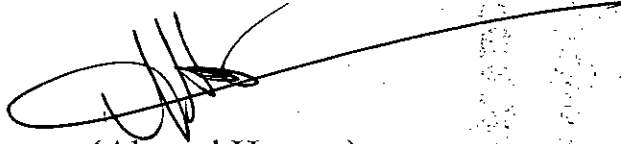


(Muhammad Hamid Mughal)
Member

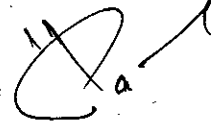
ANNOUNCED
29.11.2019

29.11.2019

Appellant with counsel present. Mr. Kabir Ullah Khattak learned Additional Advocate General for official respondents present. Private respondent No.4 with counsel present. Vide our separate judgment of today of this Tribunal placed on file, the present service appeal is dismissed. Parties are left to bear their own costs. File be consigned to the record room.



(Ahmad Hassan)
Member



(Muhammad Hamid Mughal)
Member

ANNOUNCED.
29.11.2019

01.11.2019

Counsel for the appellant and Addl. AG Fawad Afzal, Senior Clerk for official respondents and junior to counsel for private respondent No. 5 present.

Request for further time is made on behalf of respondents to furnish reply/comments. Last opportunity is granted to the respondents for submission of requisite reply/comments on 14.11.2019 before S.B.


Chairman

14.11.2019

Junior to counsel for the appellant and Addl. AG alongwith Fawad Afzal, Senior Clerk and counsel for private respondent No. 4 present.

Respondents No. 2 & 4 have furnished their respective reply/comments. Placed on record. Representative of respondent No. 1 relies on the written reply of respondent No. 2. Respondent No. 3 has not furnished comments/reply despite last opportunity. The appeal is assigned to D.B for arguments on 29.11.2019. The appellant may submit rejoinder within 10 days, if so advised.


Chairman

Service Appeal No. 719/2019

23.09.2019 Appellant in person, Mr. Kabirullah Khattak, Additional AG alongwith Mr. Fawad Afzal, Senior Clerk on behalf of official respondents No. 1 to 3 and private respondent No. 4 in person present.

Written reply/comments on behalf of respondents not submitted. Representatives of official respondents as well as private respondent seek further time. Adjourned to 18.10.2019 for written reply/comments before S.B.


CHAIRMAN

18.10.2019 Appellant alongwith counsel and Addl. AG for the official respondents present. Miss Rabia Muzaffar, Advocate has submitted Wakalatnama on behalf of respondent No. 4 and requests for time to file reply/comments by the said respondent. A similar request is also made by learned AAG on behalf of official respondents.

Adjourned to 01.11.2019 on which date the requisite reply shall positively be submitted by all the respondents.


Chairman

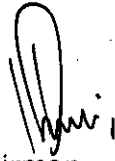
22.07.2019

Counsel for the appellant present.

Contends, inter-alia, that the appellant was promoted from BS- 16 to BS-17 as Subject Specialist in English through notification dated 22.06.2018 and was posted at GHSS Spin Dhand, Khyber Agency. On the place of his posting he was required to teach in English but he was wrongly posted against the post of S.S (Economic). To that effect a report was endorsed on his application dated 23.01.2019 by the official concerned. It was clearly noted in the endorsement that the appellant was working against a wrong post. In the meanwhile, a post of S.S in English fell vacant at GHSS No. 1 Jamrud, Khyber District against which the appellant made a request for his transfer. Despite the fact that wife of the appellant is performing duty at GGMS Abdullah Jan in the Khyber District the appellant was ignored and instead the respondent No. 4 was posted. Pertinently, the said respondent was a resident of District Charsadda.

In view of the available record and arguments of learned counsel, instant appeal is admitted for regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 23.09.2019 before S.B.


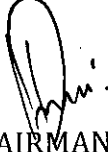

Appellant Deposited
Security & Process Fee
23/7/19


Chairman

Form- A
FORM OF ORDER SHEET

Court of _____

Case No.- 719/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	11/06/2019	<p>The appeal of Mr. Sher Bahadar presented today by Mr. Roedad Shah 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 11/06/19</p>
2-	12/06/19	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>02/07/19</u></p> <p style="text-align: right;"> CHAIRMAN</p>
02.07.2019		<p>Due to general strike on the call of Khyber Pakhtunkhwa Bar Council, learned counsel for the appellant is not available today. Adjourned to 22.07.2019 for preliminary hearing before S.B.</p> <p style="text-align: center;"> (MUHAMMAD AMIN KHAN KUNDI) MEMBER</p>

BEFORE THE HONORABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal No. 719 /2019

Mr. Sher Bahadar s/o Mewa Hassan Appellant

Vs

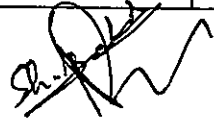
The Secretary to Govt of KP, E&SE etc. Respondents

I N D E X

Ser No	Description of the Documents	Flags	Pages
1.	Service Appeal	-	1-3
2.	Notification No SO/Edu/SSD/FATA/1560-068 dated 22-6-2018	F/A	4-14
3.	Copy of Domicile	F/B	15-16
4.	Copy of appointment order of wife	F/C	17-19
5.	Application to Secy E&SE KP	F/D	20-21
6.	Copy of Notification No. SO(SM)/E&SED/2-1/2019/Posting / Transfer/Adjustment/General dated 12-2-2019	F/E	22-24
7.	Copy of Departmental Appeal dated 13-2-2019	F/F	25
8.	Wakalat Nama	F/G	26

Dated 11 June 2019

Through


Petitioner / Appellant


(Roedad Shah Advocate)

0333-9637057

①

BEFORE THE HONORABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA

PESHAWAR

Appeal No. 719/2019

Mr. Sher Bahadar s/o Mewa Hassan, SS (English) Government Higher Secondary School Spin Dand, District Khyber

Vs

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 846

Dated 11/6/2019

1. The Secretary to Government of Khyber Pakhtunkhwa, Elementary and Secondary Education, Khyber Pakhtunkhwa Peshawar
2. The Director Education, newly merged Tribal Districts Khyber Pakhtunkhwa, Warsak Road Peshawar
3. District Education officer, District Khyber
4. Mr. Nasrullah s/o Mumtaz Khan, Government Higher Secondary School No.1 Jamrod (Government Shaheed Abdul Azam Afridi Higher Secondary School), District Khyber

Filed to-day

Registrar

Appeal under Section 4 of Service Tribunal Act 1974

That the posting and transfer of respondent No 4 vide order dated 12-2-2019 is illegal and liable to be set-aside and the appellant is the most deserving and suitable for the post to be transfer / adjusted as Subject Specialist in English SS(Eng) in Government Shaheed Abdul Azam Afridi Higher Secondary School Jamrod District Khyber (GHSS No 1 Jamrod). The departmental Appeal dated 13-2-2019 has not yet decided within stipulated statutory period of ninety days.

Prayer in appeal

On acceptance of this appeal order dated order dated 12-2-2019 regarding posting / transfer of respondent No 4 may be declared null and void and appellant may be transferred / adjusted against the vacant post of SS (Eng) in GHSS Jamrud No 1 District Khyber on which respondent No 4 is transferred / adjusted on discriminatory basis.

Respectfully sheweth !

That appellant is pleased to submit following facts:-

1. That appellant was promoted from SST (BPS-16) to SS(Eng) BPS-17 and adjusted at Govt Higher Secondary School Spin Dhand Khyber Agency against the vacant post vide FATA Secretariat Notification No SO/Edu/SSD/FATA/1560-068 dated 22-6-2018. (Copy of Notification is attached as Annexure A)
2. That after making arrival to the school concerned, while joining the service as Subject Specialist in English (SS Eng), the applicant surprised to know that there

PESHAWAR

The Petitioner and Respondent (English) Government Higher Secondary School District Peshawar

vs

- 1 The Secretary to Government of Khyber Pakhtunkhwa Elementary and Secondary Education, Khyber Pakhtunkhwa Peshawar
- 2 The Director Education newly merged Tribal Districts Khyber Pakhtunkhwa Peshawar
- 3 District Education Officer District Khyber
- 4 Mr. Nasir ul Muneer Khan (Government Higher Secondary School No 1 Jamrud Government School, District Khyber)

Appeal under Section 4 of Service Tribunal Act 1974

That the posting and transfer of respondent No 4 vide order dated 12-2-2019 is illegal and liable to be set aside and the appellant is the most deserving and suitable for the post to be transferred / adjusted as Subject Specialist in English (Eng) in Government School Abdul Azam Aftab Higher Secondary School Jamrud District Khyber (GHS No 1 Jamrud). The departmental appeal dated 12-2-2019 has not yet decided within stipulated statutory period of ninety days.

Prayer in appeal

On acceptance of this appeal order dated 12-2-2019 regarding posting / transfer of respondent No 4 may be declared null and void and appellant may be transferred / adjusted against the vacant post of SS (Eng) in GHS Jamrud No 1 District Khyber on which respondent No 4 is transferred / adjusted on discriminatory basis.

Respectfully submitted

That appellant is pleased to submit following facts:-

- 1 That appellant was promoted from SST (BP-16) to SS (Eng) BP-17 and adjusted at Govt High School District Khyber Agency against the vacant post vide FATA Secretariat Notification No SO/ED/SSD/FATA/1560-083 dated 22-2-2019 (Copy of Notification is attached as Annexure A)
- 2 That after making enquire to the section concerned with the service as Subject Specialist in English (SS Eng), the applicant surprised to know that there

was no vacant post of SS(Eng) then applicant was given charge of a wrong post i.e SS (Economic) which was vacant in that school.

3. That the appellant fulfilled the order of his Hi-ups and taught the student with devotion and dedication.
4. That it is further essential to state that at meanwhile serving against a wrong post i.e SS (Economics), instead of SS (English), on 1 January 2019 a post of SS(Eng) was vacated upon the promotion / transfer of previous SS(Eng) in Govt Shaheed Abdul Azam Afrid Higher Secondary School Jamrud No 1, District Khyber.
5. That being a local / domicile holder of District Khyber and on the basis of Wed-lock Policy, as wife of the appellant is a teacher (PSHT) also posted at District Khyber, applied for the said vacant post i.e SS(Eng) at the offices of respondents. (Copies of Domicile, appointment order of wife and Application are attached respectively as annexure B, C & D)
6. That appellant has waited for expiry of statutory period but the respondents No. 1 to 3 were wrongfully persuaded and they issued General Notification No. SO(SM)E&SED/2-1/2019/Posting/Transfer/Adjustment/General dated 12/2/2019 for posting / transfer/ Adjustment of officers of E&SE in which at (ser No126) of the said notification respondent No. 4 being a non-local (i.e belong to District Mohmand) has been transferred to the post for which the appellant was lawful deserving officer hence with mala-fide intents over-pass genuine right of the applicant, which is clear cut violation of the SOPs / Policies on the subject. This wrong and unlawful order of the respondents has crippled each and every opportunity to work on original post/cadre and other benefits in service in shape of serving in parent District, Wed-lock Policy etc keeping in view the fact that local domicile, wed-lock policy and seniority of the appellant have been ignored. **(Copy of order dated 12-2-2019 is attached as Annexure E)**
7. That aggrieved from the act/omission of the respondents and Transfer/posting/Adjustment order dated 12-2-2019 (Supra) the appellant filed a Departmental Appeal to redressed his grievances. **(Copy of Departmental Appeal is attached as Annexure F)**
8. That respondents / Authorities concerned turned deaf ear to appeal / representation of the appellant and not decided the same as yet, hence the instant appeal on the following grounds amongst others:-

Grounds

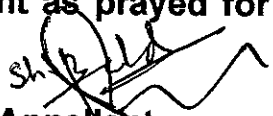
- a. That the acts and omissions of the respondents not to transfer / adjusted the appellant is against the law hence not tenable.
- b. That appellant belongs to District Khyber and his wife is also working in same District hence under the wed-lock policy they are to be posted / Adjusted in their parent District i.e District Khyber.
- c. That the respondent No 4 is a non-local of District Khyber, belonging to District Mohmand and junior from appellant hence the appellant is most deserving instead of respondent No. 4.




- d. That due to the illegal and un-warrant acts of the respondents the valuable legal rights of the appellant is infringed which is against the principal of Natrual justice as well as against the law facts and norms.
- e. That the order of the respondents No.1 to 3 of posting / transferring of the respondent No. 4 as SS(eng) GHSS JAMRUD No.1 is discriminatory which infringed the valuable rights of the appellant hence not maintainable in eyes of law.
- f. That the posting / adjustment of respondent No 4 is against the law and rule of posting / Transfer policies of the Government of KP, Hence illegal and not maintainable.
- g. That respondent No 4 is Adjusted / Posted through political interference which is prohibited by plethora of judgment of the superior Courts.

Prayer:

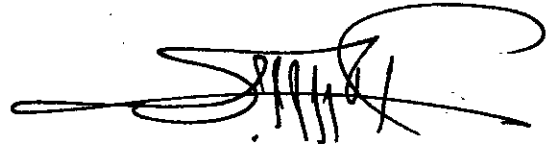
It is therefore humbly prayed that on acceptance of this service Appeal, order may kindly be passed in favour of appellant as prayed for in heading of this appeal


Appellant

Through


Rozeedat Shah Advocate
Peshawar

CERTIFICATE: It is certified that as per instruction of my client, no service appeal has been filed before this Honorable Tribunal or in any other forum / court on the same subject-matter.


ADVOCATE

That due to the illegal and unconstitutional acts of the respondents the valuable rights of the appellant is infringed which is against the principle of Natural Justice as well as against the law facts and norms.

That the order of the respondents No 1 to 5 of posting / transferring of the respondent No 4 as Special GHS JAMRUD No 1 is discriminatory which infringed the valuable rights of the appellant hence not maintainable in eyes of law.

That the posting / adjustment of respondent No 4 is against the law and rule of posting / Transfer policies of the Government of KP. Hence illegal and not maintainable.

That respondent No 4 is Adjusted / Posted through political interference which is prohibited by clause of judgment of the superior Courts.

Prayer:

It is therefore humbly prayed that on acceptance of this service Appeal, order may kindly be passed in favour of appellant as prayed for in heading of this appeal.

Appellant

Through

Roshad Sial Advocate

Registrar

CERTIFICATE: It is certified that as per instruction of my client, no service appeal has been filed before the Honorable Tribunal or in any other forum / court on the same subject-matter.

ADVOCATE

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FATA SECRETARIAT
(SOCIAL SECTORS DEPARTMENT)
WARSAK ROAD PESHAWAR
Dated Peshawar the June 22, 2018

Annex "A"



NOTIFICATION

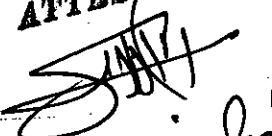
No.SO/Edu/SSD/FATA/ 1560-068 Consequent upon their promotion adjustment and placement of their services at the disposal of FATA Secretariat vide Section Officer (Schools Male) Govt. of Khyber Pakhtunkhwa, Elementary & Secondary Education Department Notification No.SO (SM)E & SED/2-1/2018/Promotion BS-16 & BS-17 dated 24/05/2018, the Competent Authority is pleased to post / adjust the following officers promoted from the post of SST BS-16 to the post of Subject Specialist BS-17 on regular basis in the Schools / Stations mentioned against their names below w.e.f 24-5-2018 in the interest of public service.

S#	Name of Officer with Designation and Present Place of Posting	Promoted as	Remarks
1	Mr. Gohar Rehman, SST, Govt. Middle School Gadimir, Bajaur Agency.	Subject Specialist in Biology (BS-17)	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.
2	Mr. Asghar Khan, SST, Govt. Middle School Dliawar Khan FR Bannu.	Subject Specialist in Biology.(BS-17)	Adjusted at Govt. Higher Secondary School Andkhal Orakzai Agency against the vacant post.
3	Mr. Alamgir Khan, Govt. High School Ghazi Marjan FR Bannu.	Subject Specialist in Biology (BS-17)	Adjusted at Govt. Higher Secondary School Sarobi Gami Orakzai Agency against the vacant post.
4	Mr. Haider Zaman, SST, Govt. High School Batwar Salarzai, Bajaur Agency.	Subject Specialist in Biology (BS-17)	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.
5	Mr. Pirzada Khan, SST, Govt. High School Darra Adam Khel FR Kohat.	Subject Specialist in Biology (BS-17)	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.
6	Mr. Gul Shehzad, SST, Govt. High School Saddique Kot, North Waziristan Agency.	Subject Specialist in Biology (BS-17).	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.

ATTESTED
[Signature]
Adv. Raza

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7	Mr. Atiq-Ur-Rehman, SST, Govt. High School Muhammad Nawaz Kot, North Waziristan Agency.	Subject Specialist in Biology (BS-17)	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.
8	Mr. Azam Jan, SST, Govt. High School Ilam Gudar Khyber Agency.	Subject Specialist in Biology (BS-17)	Vice S.No.97
9	Syed Abrar Hussain, SST, Govt. High School Qubad Shah Khel Kurram Agency.	Subject Specialist in Biology (BS-17)	Adjusted at Govt. Higher Secondary School Alizar Kurram Agency against the vacant post.
10	Mr. Farmanullah, SST, Govt. High School Kotki Charmang Bajaur Agency.	Subject Specialist in Biology (BS-17)	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.
11	Mr. Naseeb Zada, SST, Govt. High School Ghazi Baba, Bajaur Agency	Subject Specialist in Biology (BS-17)	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.
12	Mr. Shoaib Ullah, SST, Govt. High School Akhurwal FR Kohat.	Subject Specialist in Biology (BS-17)	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.
13	Mr. Saleem Ullah, SST, Govt. High School Shenkai, South Waziristan Agency	Subject Specialist in Biology (BS-17)	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.
14	Mr. Hazrat Noor, SST, Govt. High School Khar Bajaur Agency	Subject Specialist in Biology (BS-17)	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.
15	Mr. Shakoor-Ur-Rehman, SST, Govt. Middle School Wali Khan Bakka Khel FR Bannu.	Subject Specialist in Biology (BS-17)	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.
16	Mr. Said Kamal Khan, SST, Govt. Higher Secondary School Ashkar Kot South Waziristan Agency	Subject Specialist in Biology (BS-17)	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.

ATTESTED

Adv. Rashed

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17	Mr. Hayat Muhammad, SST, Govt. High School Ghani Adai Bajaur Agency	Subject Specialist in Biology (BS-17)	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.
18	Mr. Liaqat Ali, SST, Govt. High School Pindi Lalma Khyber Agency.	Subject Specialist in Biology (BS-17).	Adjusted at Govt. Higher Secondary School Prang (Ghani) Mohmand Agency against the vacant post.
19	Syed Miftikhar Hussain, SST, Govt. High School Qubad Shah Khel Kurram Agency.	Subject Specialist in Biology (BS-17).	Adjusted at Govt. Higher Secondary School Angoon Kurram Agency against the vacant post.
20	Mr. Anwar Saadat, SST, Govt. High School Sra Mela Orakzai Agency.	Subject Specialist in Biology (BS-17).	Adjusted at Govt. Higher Secondary School Sarobi Garai Orakzai Agency against the vacant post.
21	Mr. Shafi-Ud-Din, SST, Govt. Shaheed Abdul Azeem Afridi Model Higher Secondary School No.1 Jamrud Khyber Agency.	Subject Specialist in Chemistry (BS-17).	Adjusted at Govt. Higher Secondary School Pindi Lalma Khyber Agency against the vacant post.
22	Mr. Abdur Rashid, SST, Govt. High School Jandola FR Tank	Subject Specialist in Chemistry (BS-17).	Adjusted at Govt. Higher Secondary School Shaheed South Waziristan Agency against the vacant post.
23	Mr. Nahidullah, SST, Govt. High School Tappi North Waziristan Agency.	Subject Specialist in Chemistry (BS-17).	Adjusted at Govt. Higher Secondary School Angoon Kurram Agency against the vacant post.
24	Mr. Asghar Khan, SST, Govt. High School Din Muhammad FR Tank.	Subject Specialist in Chemistry (BS-17)	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.
25	Mr. Nasir Munammad, SST, Govt. High School Uchat Kurram Agency.	Subject Specialist in Chemistry (BS-17).	Adjusted at Govt. Higher Secondary School Akmal Kurram Agency against the vacant post.
26	Mr. Rashid Khan, SST, Govt. High School FR D.I.Khan.	Subject Specialist in Chemistry (BS-17).	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.
27	Mr. Nashid Ullah, SST, Govt. High School Darazinda FR D I.Khan.	Subject Specialist in Chemistry (BS-17)	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.
28	Mr. Fazal Hameed, SST, Govt. High School Dara Adam Khel FR Kohat.	Subject Specialist in Chemistry (BS-17).	Adjusted at Govt. Higher Secondary School And Orakzai Agency against the vacant post.

ATTESTED


Adnan Raza

7

	Mr. Afzal Noor Khan, SST, Govt. High School Tal Village North Waziristan Agency.	Subject Specialist in Chemistry (BS-17)	Adjusted at Govt. Secondary School Sarobi Orakzai Agency against vacant post.
30	Mr. Riaz Khan, SST, Govt. High School Ghazi Marjan FR Bannu.	Subject Specialist in Economics (BS-17).	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.
31	Mr. Azmatullah Khan, SST, Mishti Bazar Orakzai Agency.	Subject Specialist in Economics (BS-17).	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.
32	Mr. Afsar Ali Khan, SST, Govt. Middle School Malik Mumtaz Boji Khei FR Bannu.	Subject Specialist in Economics (BS-17)	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.
33	Mr. Hikmatullah, SST, Govt. Middle School Kalai Khei FR Bannu.	Subject Specialist in Economics (BS-17).	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.
34	Mr. Fazl-Ur-Rehman, SST, Govt. High School Paryal North Waziristan Agency.	Subject Specialist in Economics (BS-17).	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.
35	Mr. Amjad Hussain, SST, Govt. High School Zeran Kurram Agency.	Subject Specialist in Economics (BS-17)	Adjusted at Govt. Higher Secondary School Kalaya Orakzai Agency against the vacant post.
36	Mr. Zarwali Khan, SST, Govt. High School Tappi North Waziristan Agency.	Subject Specialist in Economics (BS-17).	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.
37	Mr. Shahid Hussain, SST, Govt. Ibrar Hussain Shaheed High School No.1 Parachinar Kurram Agency.	Subject Specialist in Economics (BS-17).	Vice. S.No 98
38	Mr. Jehanzeb Ullah, SST, Govt. High School Miranshah North Waziristan Agency.	Subject Specialist in Economics (BS-17).	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.

ATTESTED



Adv. Rashed

8

39	Mr. Tahir Ibrar, SST, Govt. Middle School Bahadar Jan FR Bannu.	Subject Specialist in Economics (BS-17)	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.
40	Mr. Hassam-Ud-Din, SST, Govt. Middle School Malik Mela South Waziristan Agency.	Subject Specialist in English (BS-17)	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.
41	Mr. Bacha Khan, SST, Govt. High School Gul Baz Mohmand Agency.	Subject Specialist in English (BS-17)	Adjusted at Govt. Higher Secondary School Ghailana Mohmand Agency against the vacant post.
42	Mr. Abdur Rahim, SST, Govt. High School Shewa North Waziristan Agency.	Subject Specialist in English (BS-17)	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.
43	Mr. Muhammad Farooq, SST, Govt. High School Manz Ghari Orakzai Agency.	Subject Specialist in English (BS-17)	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.
44	Mr. Muhammad Shoab, SST, Govt. Middle School Shahi Gul FR Bannu.	Subject Specialist in English (BS-17)	Adjusted at Govt. Higher Secondary School Andkna Orakzai Agency against the vacant post.
45	Mr. Inam-Ullah, SST, Govt. High School Subhan Khuwar Mohmand Agency.	Subject Specialist in English (BS-17)	Adjusted at Govt. Higher Secondary School Prang Ghar Mohmand Agency against the vacant post.
46	Mr. Jawad Hussain, SST, Govt. Shaheed Abrar Hussain Model High School Parachinar Kurram Agency.	Subject Specialist in English (BS-17)	Adjusted at Govt. Higher Secondary School Angon Kurram Agency against the vacant post.
47	Mr. Karam Ali, SST, Govt. High School Amal Kot Kurram Agency.	Subject Specialist in English (BS-17)	Adjusted at Govt. Higher Secondary School Alizai Kurram Agency against the vacant post.
48	Mr. Muhammad Saddiq, SST, Govt. Middle School Shalobar No.1 Khyber Agency.	Subject Specialist in English (BS-17)	Adjusted at Govt. Higher Secondary School Pindi Lalina Khyber Agency against the vacant post.
49	Mr. Sher Bahadar, SST, Govt. Higher Secondary School Spin Dhand Khyber Agency.	Subject Specialist in English (BS-17)	Adjusted at Govt. Higher Secondary School Spin Dhand Khyber Agency against the vacant post.


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[Signature]
Adv. Roeeza

9

	Mr. Sabir Shah, SST, Govt. High School Hassu Khel North-Waziristan Agency.	Subject Specialist in English (BS-17).	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.
51	Mr. Nasrullah, SST, Govt. High School Shangai Khyber Agency.	Subject Specialist in English (BS-17).	Adjusted at Govt. Higher Secondary School Spin Dhand Khyber Agency against the vacant post.
52	Mr. Asif Kamal, SST, Govt. Middle School Samand Kot North Waziristan Agency.	Subject Specialist in History cum Civics (BS-17).	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.
53	Mr. Aziz- Ullah, SST, Govt. Middle School Jalal Khan Koroona FR D.I.Khan.	Subject Specialist in History cum Civics (BS-17).	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.
54	Mr. Mushtaq Hussain, SST, Govt. Shaheed Abrar Hussain Model High School Parachinar Kurram Agency.	Subject Specialist in History cum Civics (BS-17).	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.
55	Mr. Sakhi Zaman, SST, Govt. Middle School Waii Noor FR Bannu.	Subject Specialist in History cum Civics (BS-17).	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.
56	Mr. Rahatullah, SST, Govt. Middle School Warika Janni Khei FR Bannu.	Subject Specialist in History cum Civics (BS-17).	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.
57	Mr. Sardar Khan, SST, Govt. Middle School Asmari Mohmand Agency.	Subject Specialist in History cum Civics (BS-17).	Adjusted at Govt. Higher Secondary School Prang Ghar Mohmand Agency against the vacant post of Subject Specialist in Pak Study (BS-17) post.
58	Mr. Said Muhammad SST/AAEO, now working at Govt. Middle School Boya North Waziristan Agency.	Subject Specialist in History cum Civics (BS-17).	Adjusted at Govt. Higher Secondary School Sarob Ghari Orakzai Agency against the vacant post.
59	Mr. Bakhtiar Zaman, SST, Govt. College for Elementary Teachers Mirali North Waziristan Agency.	Subject Specialist in Islamiyat (BS-17).	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.

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Adv. Raza

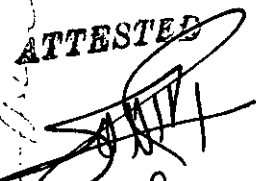
10

60	Mr. Muhammad Yousaf, SST, Govt. High School Tang Khatta Bajaur Agency.	Subject Specialist in Islamiyat (BS-17).	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.
61	Mr. Shafqatullah, SST, Govt. High School Kot Kai South Waziristan Agency.	Subject Specialist in Islamiyat (BS-17).	Adjusted at Govt. Higher Secondary School Sarobi Garhi Orakzai Agency against the vacant post.
62	Mr. Ghufuran Khan, SST, Govt. Middle School Shamazan Kot North Waziristan Agency.	Subject Specialist in Islamiyat (BS-17).	Adjusted at Govt. Higher Secondary School Kalaya Orakzai Agency against the vacant post.
63	Mr. Qasim- Ud-Din, SST, Govt. High School Rustam Kor FR Tank.	Subject Specialist in Maths (BS-17).	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.
64	Mr. Hidayatullah, SST, Govt. Middle School Ibrar Eidak Khel FR Bannu.	Subject Specialist in Maths (BS-17).	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.
65	Mr. Sahar Gul, SST, Govt. Middle School Toot Dhand Khyber Agency.	Subject Specialist in Maths (BS-17).	Adjusted at Govt. Higher Secondary School Pindi Lalma Khyber Agency against the vacant post.
66	Mr. Afsarullah, SST, Govt. High School Zarwam FR Bannu.	Subject Specialist in Maths (BS-17).	Adjusted at Govt. Higher Secondary School Andkheil Orakzai Agency against the vacant post.
67	Mr. Muhibullah, SST, Govt. High School Awal Khan FR Bannu.	Subject Specialist in Maths (BS-17).	Adjusted at Govt. Higher Secondary School Sarobi Garhi Orakzai Agency against the vacant post.
68	Mr. Hazrat Bilal, SST, Govt. High School Saadullah FR Bannu.	Subject Specialist in Maths (BS-17).	Adjusted at Govt. Higher Secondary School Alizai Kurram Agency against the vacant post.
69	Mr. Noor Gul Khan, SST, Govt. High School Sarwar Jan FR Bannu.	Subject Specialist in Maths (BS-17).	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.
70	Mr. Muhammad Imran, SST, Govt. Higher Secondary School Gardai Bajaur Agency	Subject Specialist in Maths (BS-17).	Adjusted at Govt. Higher Secondary School Prang Ghar Mohmand Agency against the vacant post.


ATTESTED
[Signature]
Adv Roesdad

11

71	Mr. Muhammad Javed, SST, Govt. High School Kotla Habibullah FR Bannu.	Subject Specialist in Maths (BS-17).	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.
72	Mr. Noor Rehman, SST, Govt. Middle School Tangi Badin Zai South Waziristan Agency.	Subject Specialist in Pak Study (BS-17).	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.
73	Mr. Abdul Jabbar, SST, Govt. High School Illam Gudar Khyber Agency.	Subject Specialist in Pashto (BS-17)	Adjusted at Govt. Higher Secondary School Pindi Lalma Khyber Agency against the vacant post.
74	Mr. Hassan Nabi, SST, Govt. High School Mallana Kurram Agency.	Subject Specialist in Pashto (BS-17).	Adjusted at Govt. Higher Secondary School Angori Kurram Agency against the vacant post.
75	Mr. Kamal Hussain, SST, Govt. High School Alam Sher Kurram Agency.	Subject Specialist in Pashto (BS-17).	Adjusted at Govt. Higher Secondary School Aizai Kurram Agency against the vacant post.
76	Mr. Imdad Hussain, SST, Govt. High School Mallana Kurram Agency.	Subject Specialist in Pashto (BS-17).	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.
77	Mr. Dosta Khan, SST, Govt. High School Zarwar FR Bannu.	Subject Specialist in Pashto (BS-17).	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.
78	Mr. Haider Khan, SST, Govt. High School Ghundi Sheikhhan FR Tank.	Subject Specialist in Pashto (BS-17).	Adjusted at Govt. Higher Secondary School Shahoor South Waziristan Agency against the vacant post.
79	Mr. Awal Badshah, SST, Govt. High School Garyum North Waziristan Agency.	Subject Specialist in Pashto (BS-17).	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.
80	Mr. Javed Khan, SST, Ex-AAEO Mohmand Agency.	Subject Specialist in Pashto (BS-17).	Adjusted at Govt. Higher Secondary School Prang Ghar Mohmand Agency against the vacant post.
81	Mr. Hazir Rehman, SST, Govt. High School Sra Shah Mohmand Agency	Subject Specialist in Pashto (BS-17).	Adjusted at Govt. Higher Secondary School Prang Ghar Mohmand Agency against the vacant post.

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Adv
Rozedad

82	Mr. Shamas Khan, SST, Govt. High School Tail Village North Waziristan Agency.	Subject Specialist in Pashto (BS-17).	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post (The incumbent has already retired on 15.4.2018).
83	Mr. Deen Muhammad, SST, Govt. Middle School Shuza FR Tank.	Subject Specialist in Pashto (BS-17)	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.
84	Mr. Rasool Khan, SST, Govt. High School Kohi Hassan Khel FR Peshawar.	Subject Specialist in Pashto (BS-17).	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.
85	Mr. Noor Muhammad, SST, Govt. High School Shan Alam Salay Mohmand Agency.	Subject Specialist in Pashto (BS-17).	Adjusted at Govt. Higher Secondary School Pindi Laima Mohmand Agency against the vacant post.
86	Mr. Rashid- Ur- Rehman, SST, Govt. High School Mandoos Kot North Waziristan Agency.	Subject Specialist in Pashto (BS-17).	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.
87	Mr. Sajjad Ahmad, SST, Govt. Middle School New Razi South Waziristan Agency.	Subject Specialist in Physics (BS-17).	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.
88	Mr. Sajid Ahmad, SST, Govt. High School And Khel Orakzai Agency.	Subject Specialist in Physics (BS-17).	Adjusted at Govt. Higher Secondary School Andkhel Orakzai Agency against the vacant post.
89	Mr. Abdul Haleem, SST, Govt. High School Shahgai Khyber Agency.	Subject Specialist in Physics (BS-17).	Adjusted at Govt. Higher Secondary School Pindi Laima Khyber Agency against the vacant post.
90	Mr. Saifur-Rehman, SST, GSMZHSS Sama Badabera FR Peshawar.	Subject Specialist in Physics (BS-17).	Adjusted at Govt. Higher Secondary School Sama Badabera FR Peshawar against the vacant post.
91	Mr. Abdul Dayan, SST, Govt. High School Batwar Salarzai Bajaur Agency.	Subject Specialist in Physics (BS-17).	Adjusted at Govt. Higher Secondary School Prang Ghor Mohmand Agency against the vacant post.

ATTESTED

 Adv. Rosadad

92	Mr. Rekab Ali, SST, Govt. Higher Secondary School Kalay Orakzai Agency.	Subject Specialist in Urdu (BS-17).	Adjusted at Govt. Secondary School Sarobik Orakzai Agency against vacant post.
93	Mr. Wahab Hussain, SST, Govt. High School Zeran Kurram Agency.	Subject Specialist in Urdu (BS-17).	Adjusted at Govt. Higher Secondary School Alizai Kurram Agency against the vacant post.
94	Mr. Jamshid Khan, SST, Govt. High School Shpalkiwai FR Kohat.	Subject Specialist in Urdu (BS-17).	Adjusted at Govt. Higher Secondary School Andkhel Orakzai Agency against the vacant post.
95	Mr. Ghulam Farooq, SST / AAEO FR Kohat.	Subject Specialist in Urdu (BS-17)	Adjusted at Govt. Higher Secondary School Andkhel Orakzai Agency against the vacant post.
96	Mr. Nizam -Ud-Din, SST, Govt. High School Painda Khel Bajaur Agency.	Subject Specialist in Urdu (BS-17).	Services placed at the disposal of Elementary & Secondary Education Department Khyber Pakhtunkhwa due to Non-availability of subject post.

Consequential Transfers

S#	Name of Officer with Designation and Present Place of Posting	Transferred / Adjusted as	Remarks
97	Mr. Muhammad Noor, Subject Specialist (BS-17), Govt. Higher Secondary School Pindi Lalma Mohmand Agency.	Subject Specialist (BS-17), Govt. Higher Secondary School Ashkar Kot South Waziristan Agency	Against the vacant post.
98	Mr. Sabir Hussain, Subject Specialist (BS-17), Govt. Higher Secondary School Shalozan Kurram Agency.	Subject Specialist (BS-17), Govt. Higher Secondary School Angori Kurram Agency.	Against the vacant post.

ATTESTED

[Signature]
Adv. Rozeedadi

2. The terms & conditions will remain the same as notified in the mentioned notification.
3. No TA / DA allowed.

Additional Chief Secretary FATA

Copy of the above is forwarded to the:

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

ATTESTED

[Signature]
ADV Rozeejad

[Signature]
22/5/11

Abdul Mannan

Section Officer Education

Ann "B"

(15)

GOVERNMENT OF PUNJAB
Khyber Agency

Certified that Mr/Miss SHEER BAHADUR
son/daughter of MALIMA HASSAN
belongs to a recognized tribe of MALIK DINA KHEL
Section DOLA GATE KHEL sub section ALAMA KHEL
residence/village NALA KHATOLI
and his/her father is a permanent bonafide resident of the tribal area of
Khyber Agency. He/She is an eligible candidate to avail himself/herself
of the seats reserved for the special areas of the Peshawar Division
backward area of Khyber Agency.

Verified

Political Tehsildar
Khyber Agency

Attes ed

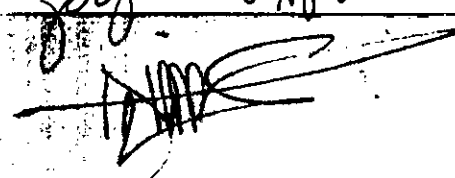
Assit: Political Agent
Political Agent

Countersigned

Political Agent Khyber
Agency

NO-387
25.5.55

ATTESTED

ABU ROOFOOD


بیان خیبر پختونخوا

مستحقین کے لئے سید اہلسان اور سید اہل سنت کی خدمت میں

مستحق شہر بکھار ولد میدوہ حسن
 قوم مکدین محل پہ دولت خیل ساکن نالہ مہروی
 تحصیل ڈاکخانہ بارہ خیبر ایجنسی کا اصل پیدائشی اور کونتی باشندہ ہے

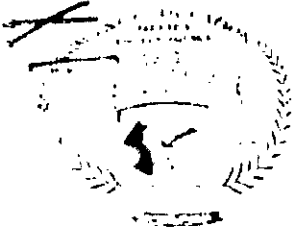
علامہ خیبر ایجنسی میں جائیداد رکھتے ہیں یہیں حکومت پاکستان کے وفادار ہیں قوم کے ساتھ نفع اور نقصان دونوں میں برابر کے شریک ہیں اور سوا جب خود ہیں لداک ضمن میں قہم کھنڈہ داری قبول کرتے ہیں نیز اگر مندرجہ بالا تصدیقی میں کسی قسم کی غلطی یا جھوٹ پائی گئی تو ہم مبلغ پچاس ہزار (۵۰۰۰۰) روپیہ کھنڈہ فریب پاکستان بطور فی نفر جرمانہ حکومت کو لاد کر دیں گے۔

سید ریش سفید شیخ جان خان صاحب
 سفید ریش سفید شیخ جان خان صاحب
 سفید ریش سفید شیخ جان خان صاحب
 سفید ریش سفید شیخ جان خان صاحب

جان خان صاحب
 سفید ریش سفید شیخ جان خان صاحب
 سفید ریش سفید شیخ جان خان صاحب
 سفید ریش سفید شیخ جان خان صاحب

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ATTESTED
[Signature]
 Adv. Roedad



17

AGENCY EDUCATION OFFICE
KHYBER AGENCY AT JAMRUD
PHONE. 091-5820584 FAX 091-5820584

Anx "C"

NOTIFICATION

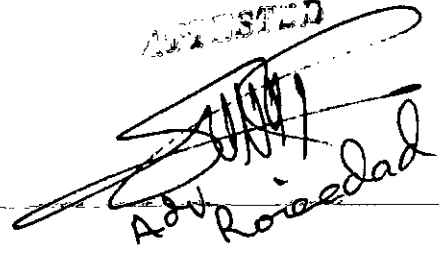
Consequent upon the recommendation of Departmental promotion committee's vide AEO office No. 7345 A 48 dated 29-11-2017, No. 7473 A 48 dated 04-12-2017, No. 7533-A 35 dated 6-12-2017, No. 7672 A 75 dated 11-12-2017, No. 7739-A-41 dated 13-12-2017, No. 7795-A-97 dated 15-12-2017, No. 8066-A-68 dated 19-12-2017 the following Female SPSTs BPS-14 are hereby promoted to PSHT BPS-15 (Female) (16120-1330 5620) with immediate effect in the public interest and posted at the station noted below:

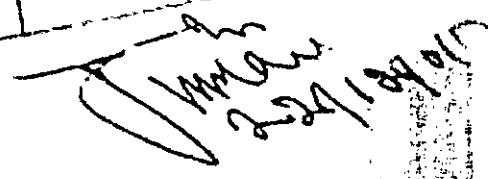
S.No	Seniority No.	Name	Present school	Proposed Place of Posting
1	8	Sumera Parveen	GGPS Noor Afzal Bara	GGPS Noor Afzal
2	15	Safia Sabir	GGPS Sardar Killi	GGPS Habib Shah
3	26	Rozina	GGPS Qamar Gul Bar	GGPS Qamar Gul
4	28	Robina Shahin	GGPS Jehan Zeb	GGPS Jamil Khan LKL
5	32	Shazia Bano	GGPS Gula Khan	GGPS Younas Khan
6	35	Nahid Akhtar	GGPS Babo Khan	GGPS Babo Khan
7	45	Najida	GGPS Khewa Gul	GGPS Khewa Gul
8	48	Nahid Akhtar	GGPS Sawat Khan	GGPS Sawat Khan
9	50	Abida Bibi	GGPS Ghani Killi	GGPS Ghani Killi
10	51	Shahin Akhtar	GGPS Tora Tara	GGPS Tora Tara
11	54	Ulfat Bibi	GGPS Qawat Khan	GGPS Qawat Khan
12	62	Nahid Begum	GGPS Lawas Khan	GGPS Neki Khan No. 2
13	63	Rukhsana Gul	GGMS Azam Din	GGMS Azam Din
14	64	Shazia	GGPS Mughal Baz	GGPS Mughal Baz

Adv. Raza

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300	Meena Angiz	GGPS Jan Khel	GGPS Jan Khel
125 301	Basharat Gul	GGPS Muhammad Ali LKL	GGPS Muhammad Ali LKL
126 302	Muntha	GGMS Wall Khel	GGMS Abdulah Jan
127 303	Razia	GGPS Sur Kass Sohbat Shah	GGPS Sur Kass Sohbat Shah
128 305	Sitara	GGPS Habib Shah Jam:	GGPS Ahmad Shah Shagai
129 307	Tabasum	GGPS Zarif Khan Shinko	GGPS Sarkar Kammar
130 308	Memraj	GGPS Usman Killi Jam:	GGPS Shah Alam
131 309	Saeeda Naz	GGPS Ghariza No 1 Jam	GGPS Ghariza No 1 Jam
132 310	Robi	GGPS Ayub Kill SQ	GGPS Ayub Kill SQ
133 311	Miss Rafida	GGPS M. Abdul Khalig	GGPS M. Abdul Khalig
134 312	Kiran	GGPS Gulab Noor LKL	GGPS Bagh Killi Kam Shilman
135 314	Sadia	GGPS Muhammad Ayub Kill	GGPS Sher Bahadar
136 316	Meena Gul	GGPS Bughdadi Shah Jam	GGPS Bughdadi Shah Jam
137 317	Safina Iqbal	GGPS Maweez Killi Jam	GGPS Maweez Killi Jam
138 318	Hasina Sultana	GGPS Yar Gul Khel	GGPS Yar Gul Khel
139 319	Wajiha Saba	GGPS Saida Jan	GGPS Saida Jan
140 320	Bibi Shahida	GGPS Din Akbar	GGPS Din Akbar
141 321	Rahat Begum	GGMS Nazir Shah	GGMS Nazir Shah
142 322	Parveen Gul	GGPS Gul Badshah	GGPS Gul Badshah
143 323	Nosheen Gul	GGPS Khan Zamir	GGPS Khan Zamir
144 324	Shabana	GGPS M. Abdul Khalig	GGPS Mian Khan
145 326	Rubi Aziz	GGPS Aseel Khan	GGPS Aseel Khan
146 327	Rozina Ayub	GGPS Said Akbar Jam	GGPS Usman killi Mulagory
147 329	Fazeelat Qureshi	GGPS Sher Ali	GGPS Sher Ali
148 330	Shakila Mehar	GGPS Bughdadi Shah	GGPS Baso Garhi Jam
149 331	Saima Bibi	GGPS Sajid Killi	GGPS Tanq Killi

APPROVED

 Adv. Rozeeza


 22/10/15

24	Begum, GGPS Baso Garhi	GGPS Bughdadi Shah
25	Abia Bahadar, GGMS Shah Wali Killi LKL	GGPS Hukam Khan
26	Saida Ghalib, GGPS Janas Khan	GGMS Ahmad Jan Killi
27	Basra GGPS Ibrahim Aman	GGPS Masal Khan Killi
28	Rashida, GGPS Younas Killi	GGPS Gula Khan
29	Shakira Zaman, GGPS Sultam Muhammad	GGPS Noor Afzal Killi
30	Shahla, GGPS Amir Shah	GGPS Astra Khan
31	Nahid Akhtar, GGPS Minar Gul	GGPS Noor Salam
32	Tasleem, GGPS Malang Garhi	GGPS Zangir Killi
33	Jamshida, GGPS Navi Kamar	GGPS Said Malang
34	Najida, GGPS Sahib Muhammad	GGPS Douran Gul
35	Ras bibi, GGPS Amir Khan Akka Khel	GGMS Douran Gul
36	Toheeda, GGPS Ayub Killi	GGPS Sahib Muhammad
37	Riffat, GGPS Sheikh Mal Khel	GGPS Sajid Killi
38	Farzana Sardar, Redeployed GGPS Anwar Shah	GGPS Noor Haider
39	Roby, GGPS Imam Din	GGPS Gulistan
40	Tajalla, GGPS Akhtar Shah	GGPS Hakim Khan MDK
41	Tamanna, GGPS Shalobar	GGPS Qadir Killi
42	Sofia Sadiq, GGPS Khairab Gul	GGPS Amir Khan Alam gudar
	Zeenat, GGPS Sarkai Kamar	GGPS Zariel Khan
	Alia GGPS Zariel Killi	GGHS Mawaz Killi
	Shagufa, GGPS Said Rehman	GGPS Wali Khel

Endst: No 8195 - 204/ PSHT(Female) Promotion/Faisal/Shehan Shah Dated 22 /12 / 2017
 Copy for information and necessary action is forwarded to the:

- 1 PS to Additional Chief Secretary FATA.
- 2 PS to Secretary SSD, FATA.
- 3 Director Education (FATA) at Peshawar.
- 4 Accountant General (PR) Sub Office, Peshawar.
- 5 Agency Accounts Officer Khyber Agency at Jamrud.
- 6 PS TO secretary Finance FATA Secretariat.
- 7 AAEO Concerned local office.
- 8 Superintendent local office.
- 9 Individual concerned.

Faisal Iqbal

ATTESTED

[Signature]
 Adv Rosiedad

AGENCY EDUCATION OFFICER
 KHYBER AGENCY AT JAMRUD
[Signature]
 22/12/2017

(20)

To

The Director Education,
Newly Merged Tribal Districts,
KP, Warsak Road, Peshawar.

Ann "D"

Subject: Transfer to GSAAHSS Jamrud, District Khyber

Honourable Sir,

With due regards, it is stated that there is a vacant SS English post at Shaheed Abdul Azam Afridi Higher Secondary School Jamrud, Khyber upon the transfer of previous SS English, Mr. Nazrul Islam who has recently been promoted to BS-18, to GHSS Comprehensive Bannu, S#138, Notification No.SO(SM)E&SED/1-3/2018/Promotion BS-17 to BS-18 (TC): dated 1st Jan, 2019.

I am a domicile holder of Distt. Khyber and presently working against wrong post at GHSS Spin Dhand Bara. I want to be transferred to above cited school to perform my duties as SS English which is my original post.

It is therefore, requested to kindly issue my transfer orders accordingly.

I shall be highly grateful to you for this act of kindness.

Dated. 02-01-2019

Yours faithfully,

Sher Bahadar, SS English
GHSS Spin Dhand, Bara, Khyber
Contact # 0300-9007264

The post of SS English has become vacant due to transfer of the previous SS English Nazrul Islam. Being a local Mr. Sher Bahadar is recommend for the said post. please.

~~ATTACHED~~
Adv Roseda

PRINCIPAL
GOVT. SHAHEED ABDUL AZAM AFRIDI
HIGHER SECONDARY SCHOOL NO 1
JAMRUD KHYBER AGENCY

~~Signature~~
3/01/2019

22
3/1/19

(21)

To

The Secretary to govt of Khyber Pakhtun khwa,
Elementary and secondary education
KPK Peshawar.

Ann "D"

Subject:

Transfer to Govt Shaheed Abdul Azam Afridi Higher
Secondary School Jamrud, District Khyber

Dear sir,

With due regards, it is stated that there is a vacant. SS English post at Govt Shaheed Abdul Azam Afridi Higher Secondary School Jamrud, Khyber upon the transfer of previous SS English, Mr. Nazrul Islam who has recently been promoted to BS-18, to GHSS Comprehensive Bannu S#138, Notification No.SO (SM)E&SED/1-3/2018/Promotion BS-17 to BS-18 (TC): dated 1st Jan, 2019.

I am a domicile holder of Distt. Khyber and presently working against wrong post at GHSS Spin Dhand Bara. I want to be transferred to above cited school to perform my duties as SS English which is my original post.

It is therefore, requested to kindly issue my transfer orders accordingly.

I shall be highly grateful to you for this act of kindness.

Dated: 23-01-2019

Sher Bahadar
Yours faithfully,

Sher Bahadar, SS English
GHSS Spin Dhand, Bara, Khyber
Contact # 0300-9007264

Forwarded in original to

*Secretary E&SED KP with the
remarks that the u/signed has no
objection to the transfer of
Mr. Sher Bahadar SS English, as he
has been working against wrong post.*

[Signature]
25/01/2019

PRINCIPAL
GHSS Spin Dhand
Bara Khyber Agency

ATTESTED

[Signature]
Adv. Rowedat


[Signature]
25/1/19

*Mr. Sher Bahadar Sp
belonge to the Khyber
Distt, Working Against Wrong
Post. There is a vacant
Post of S.S (Eng) Bs (17)
at GSAAHSS Jamrud No 4
Khyber. I strongly recom
him to be transfer on
above mentioned School*

①

22

Anx "E"



 Adil Raza


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

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:

S#	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 Zarabi Swabi	Principal (BS-18) GHSS Jhanda Swabi	V.S#4
4)	Mr. Tauqweem Ul Haq, Principal (BS-18) GHSS Jhanda Swabi	Principal (BS-18) GHSS Sheikh Jana Swabi	V.S#5
5)	Mr. Johnr Ali, Principal (BS-18) GHSS Sheikh Jana Swabi	Principal (BS-18) GHSS Zarabi 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 Jan Khan Kalay Bara Khyber	A.V.P
11)	Mr. Masceh 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 APPESTED
13)	Mr. Ghayur Ahmad, SS Economics (BS-18) Awaiting posting	Principal (BS-18) GHS Sama Ghari Khyber	V.S#14 Adil Raza
14)	Mr. Sardar, HM BS-17 working against (BS-18) GHS Sama Ghari 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

3

(2)

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

125	Mr. Mushtaq Ali, SS Urdu (BS-17) GHSS Kalaya Orakzai	SS Urdu (BS-17) GHSS Sarohi Garhi Orakzai	V.S#124
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#128
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#127
129	Mr. Zahir Ullah, SS Chemistry (BS-17) GHSS No.2 Peshawar City	SS Chemistry (BS-17) GHSS Gulbela Peshawar	V.S#130
130	Mr. Habib Ur Rehman Anjum, SS Chemistry (BS-17) GHSS Gulbela Peshawar	SS Chemistry (BS-17) GHSS No.2 Peshawar City	V.S#129
131	Mr. Umer Gul, SS Islamiyat (BS-17) GHSS Palian Manshara	SS Islamiyat (BS-17) GHSS Dhodial Manshara	A.V.P
132	Mr. Jan Muhammad, SS Economics (BS-17) GHSS Mayar Mardan	SS Economics (BS-17) GHSS Dargai Charsadda	A.V.P
133	Mr. Hidayat Hussain, SS Islamiyat (BS-17) GHSS Kawai Manshara	SS Islamiyat (BS-17) GHSS Doga Manshara	V.S#134
134	Mr. Muhammad Rifaqat, SS Islamiyat (BS-17) GHSS Doga Manshara	SS Islamiyat (BS-17) GHSS Kawai Manshara	V.S#133
135	Mr. Ubaid Ullah, SS Biology (BS-17) GHSS Mankial Swat	SS Biology (BS-17) GHSS Madyan 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 Palian Manshara	A.V.P
139	Mr. Liaqat Ali, SS Economics (BS-17) GHSS Sirikot Haripur	SS Economics (BS-17) GHSS Pannian Haripur	A.V.P
140	Mr. Sanullah, 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. Rifaqat 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

ATTESTED

Adv
Rozeddad

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**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. Rahmawaz, IPE (BS-17) GHSS Mian Khan Mardan	IPE (BS-17) GHSS Mulazai Tank	V.No 186
188	Mr. Abdul Karim, IPE (BS-17) GHSS Sarai Bala Dir Lower	IPE (BS-17) GHSS Ziarat Talash Dir Lower	A.V.P
189	Mr. Afsar 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 Pirsaddi Mardan	IPE (BS-17) GHSS Hassanzal Charsadda	A.V.P
191	Mr. Muhammad Afzal 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. Shujaat Ali, SS Biology (BS-17) GHSS Shawar Swat	SS Biology (BS-17) GHSS Baidara Swat	A.V.P
194	Mr. Mehboob Khan, HM (BS-17) GHS Qazirpur Haripur	Vice-Principal (BS-18) GHSS Sara-e-Nalmat Khan Haripur	A.V.P

2. No TA/DA is allowed.

Ends: of even No. & Date.

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.

SECRETARY

[Signature]
Adv
Roedad

[Signature] 2/12/2/19

(SHABIR KHAN)
SECTION OFFICER (SCHOOLS MALE)

To

The Secretary,
E&SE KPK,
Civil Secretariat, Peshawar.

as

Ann 'F'

Subject: Appeal for Transfer to GHSS Jamrud, Distt. Khyber

Dear Sir,

With due regards, it is stated that there was a vacant SS English post at Govt. Shaheed Abdul Azam Afridi Higher Secondary School Jamrud, Distt. Khyber upon the transfer of previous SS English, Mr. Nazrul Islam who had been promoted to BS-18, to GHSS Comprehensive Bannu, S#138, Notification No.SO (SM)E&SED/1-3/2018/Promotion BS-17 to BS-18 (TC): dated 1st Jan, 2019.

I applied for the said vacant post, SS English on 25-01-2019 at your office. Earlier, I had also applied for the said post through Directorate of Education, NMTD on 03-01-2019 (Application attached). But I came to know that Mr. Nasrullah, a Non-local (Distt. Mohmand) has been transferred (Serial # 126) yesterday, 12-02-2019 and I have been ignored despite being a local applicant.

- 1) I am a domicile holder of Distt. Khyber
- 2) I am working against Wrong Post (SS-Economics)
- 3) I should be given priority on the basis of Wed-lock policy, as my wife is a teacher (PSHT) posted at Distt. Khyber.
- 4) KPPSC has recently recommended 2 candidates of SS-Economics, so one of them is likely to replace me and I am likely to be transferred elsewhere. If I am transferred to a far off area, it will be very difficult for me to perform my duty over there.

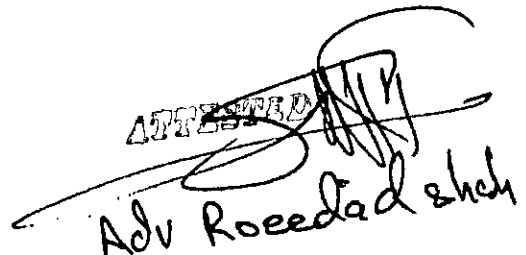
It is therefore, humbly requested to kindly consider my transfer case sympathetically and issue my transfer order by issuing a corrigendum.

I shall be highly grateful to you for this act of kindness.

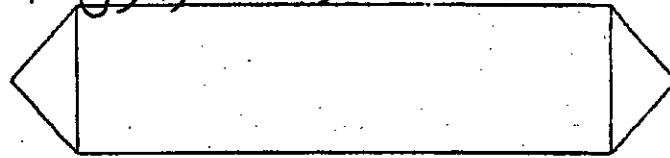
Dated: 13-02-2019


Yours faithfully,

Sher Bahadar, SS English
GHSS Spin Dhand, Bara, Khyber
Contact # 0300-9007264


Adv. Rozeeda Shch

بعد اٹت سروس ٹریسنگل جسٹس پھوٹو نوا لکامہ



2ء منجانب
بنام

سٹی بشپ ہاؤس
بنام

مورخہ
مقدمہ
دعوی
جرم

سٹیٹسٹری ایجنسی اینڈ سلیڈ ری ایجوکیشنل سوسائٹی جسٹس پھوٹو نوا وغیرہ

باعث تحریر آنکھ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ
آن مقام پشاور کیلئے روائٹس راد مشاہ ایڈووکیٹ کو وکیل
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 ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زر میں پر دستخط کرانے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری یک طرفہ یا اپیل کی برآمدگی
اور منسوخی نیز دائر کرنے اپیل گزرائی و نظر ثانی و پیروی کرنے کا مختار 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 باختیارات حاصل ہوں گے
اور اس کا ساختہ پرداختہ منظور قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے
سبب سے وہوگا۔ 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 لکھدیا کہ سندر ہے۔

سٹیٹسٹری ایجنسی

11/06/019

Attested
Accepted

2019

11 جون 2019

العبد العبد العبد
مقام پشاور کے لئے منظور ہے۔

50 روپے	28519	ایڈووکیٹ: حفیظ شاہ سمینڈ+ رابعہ حفیظ ایدوکیٹ	پشاور بار ایسوسی ایشن، خیبر پختونخواہ
		بار کونسل ایسوسی ایشن نمبر: bc-10-5543	
		رابطہ نمبر: 0301-888888	



بعدالت جناب: خسرو سیر لریٹل کے مد

مخانب: مس سائزڈ منٹ منبر 4	دعوی: مسروس اپیل
تذکرہ عیاد	علت نمبر: اپیل نمبر 719/2019
بنام	مورخہ: 18-10-19
گورنمنٹ و سہرہ	جرم:
	تھانہ:

باعت تحریر آگہ

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

آن مقام پشاور کیلئے ^{A.S.C} حفیظ شاہ سمینڈ+ رابعہ حفیظ ایدوکیٹ کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کمال 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 کاروائی 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: 18-10-19

المقام: پشاور

المقام: پشاور کے لیے منظور ہے۔

BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR.

Service Appeal No 119/2019

Sher Bahadur**Appellant.**

V E R S U S

Govt. & Others.....**Respondents**

COMMENTS ON BEHALF OF RESPONDENT NO 4

Preliminary Objections

1. That the appellant has got no cause of action and locus standi to file instant appeal.
2. That the Instant appeal is not maintainable in its present form.
3. That the appellant is estopped by his own conduct to bring instant appeal.
4. That instant appeal is not maintainable as per Section 4 of the KP Service Tribunal Act 1974 as well as per Section 10 of the KP civil Servant Act 1973.
5. That the appellant has not come to this honorable Tribunal with clean hands.
6. That instant appeal is barred by law.
7. That the appellant has concealed material facts from this honorable tribunal.
8. That this honorable Tribunal has got no jurisdiction to entertain and adjudicate upon the matter.
9. That appeal of the appellant is based on malafide.
10. That appeal of the appellant is badly time barred.

PARAWISE COMMENTS ON FACTS

1. Para No 1 pertains to the service record of the appellant hence needs no comments.
2. Para No 2 pertains to the service record of the appellant hence needs no comments.
3. Para No 3 also pertains to record and is subject to proof.
4. Para No 4 of the appeal is incorrect and as such denied, as the appellant is residing at Peshawar along with his family and not at District Khyber. The appellant has tried to mislead this honorable tribunal by twisting the facts.
5. Para under reply is baseless and unfounded as respondent No 4 was transferred from GHSS Spin Dhand Bara to GHSS No 1 Jamrod and not from District Mohmand. It is further added that the post of the respondent No 4 is not of District cadre rather is of BPS-17 and as such the version of the appellant is not tenable. In fact the appellant filed many applications and appeals which successive appeals are not covered under the law and rules on the subject.
6. Para under reply is subject to proof as the appellant has not annexed nothing with his appeal showing that he has filed the same.
7. Para No 7 is related to official respondents however no proof is there to show that the appeal was ever filed to the official respondents.

REPLY TO GROUNDS

- A. Incorrect the order has been issued according to law and rules and the appellant has failed to pin point any illegality.
- B. Incorrect as stated above the appellant is residing at Peshawar and as such too his claim is not tenable, further as stated above instant appeal is not tenable as no one can claim the posting of his choice which would rather hamper Section 10 of the Civil Servants Act 1973. Instant appeal as per Section 4 of the KP Service Tribunal Act 1974 is not maintainable and liable to dismissal.

- C. Incorrect no rights of the appellant have ben infringed as the appellant was posted at GHSS Spin Dhand on 22-06-2018 and as such too his appeal is not tenable.
- D. Incorrect the order is according to law, rules and policy of the provincial Govt. which has not resulted in infringement of any his rights.
- E. Incorrect as explained above the impugned order is in accordance with law, rules and principles of natural justice.
- F. Incorrect the allegations of political interference are baseless being made for reasons other than fair and legal beside being without any base.

It is therefore prayed that appeal of the appellant may kindly be accepted as prayed for in the heading of the appeal.

Dated:-14-11-2019


Appellant

Through


Fazal Shah Mohmand

Advocate Peshawar

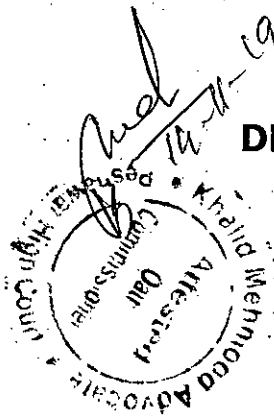
AFFIDAVIT

I, NasrUllah S/O Mumtaz Khan, Govt. Higher Secondary School No 1 (Govt. Shaheed Abdul Azam Afridi Higher Secondary School District Khyber (Respondent No 4), do hereby solemnly affirm and declare on oath that the contents of **Comments** are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.

Identified by


Fazal Shah Mohmand
Advocate Peshawar.


DEPONENT



BEFORE THE KHYBER PUKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No: 719/2019.

SHER BAHADAR SS BPS-17.....**Appellant**

VERSUS

1. The Secretary to Government of Khyber Pakhtunkhwa, E&SE
Secretary Education Peshawar and Others

.....**Respondents**

INDEX

S.NO	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGE
1	PARAWISE COMMENTS AND AFFIDAVIT	1-2

BEFORE THE KHYBER PUKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No: 719/2019.

SHER BAHADAR SS BPS-17.....**Appellant**

VERSUS

1. The Secretary to Government of Khyber Pakhtunkhwa, E&SE
Secretary Education Peshawar and Others

.....**Respondents**

Para-wise comments on behalf of respondent No: 2 .

Respectively Sheweth:

Preliminary Objection:

1. That the appellant has got no cause of action to file the instant appeal.
2. That the appellant has not come to this Honourable Tribunal with clean hands.
3. That the appellant has concealed material facts from this Honourable Tribunal.
4. That the appellant is estopped by his own conduct to bring the present appeal

On Facts:

1. Pertain to record.
2. Pertain to record.
3. Pertain to record
4. Pertain to record
5. That the respondent department being competent authority transfer a number of SS teacher keeping in view the best interest of the public.it is pertinent to mention that the SS post is not a district cadre post rather it is a provincial level post and which can be transferred to any part within the province. It is also noteworthy that the respondent No.2 strongly recommended the appellant for transfer to GSAAHSS Jamrud. However, the Respondent No. 1, being competent authority made a transfer of respondent No.4 to the said school, keeping in view the best interest of the public.
6. Pertain to records
7. As elucidated in Para 5 above

On Grounds:

- a. Incorrect. The action and omission of the respondent is according to law and appellant was treated in accordance with law.
- b. Incorrect. Hence denied. As elucidated in Para 5 above.

- c. Incorrect. Hence denied. The appellant was treated in accordance with law and while doing so no right of the appellant has been violated.
- d. Incorrect. Hence denied. As elucidated in para 5 above.
- e. Incorrect. Hence denied. That the respondent department being bound law acted in accordance with law.
- f. Incorrect. Hence denied.

Pray:

Keeping in view the above legal and factual position, it is humbly requested that the instant appeal may kindly be dismissed with cost.


Respondent No. 2.


Director Education
Newly Merged Districts

AFFIDAVIT.

We the above respondents do hereby declare and affirm on oath that the above comments are true and correct to the best of our Knowledge and belief and that nothing has been concealed from this Honorable Tribunal.

Respondent NO. 2.


Director Education
Newly Merged Districts



Elementary & Secondary Education Department
Government of Khyber Pakhtunkhwa



E-Transfer

DOCUMENT NAME:
USER MANUAL

(eTransfer Web Portal)

Version 1.0

Dated: 6th Aug, 2019

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Dated: 6th Aug, 2019

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Chapter # 1

1. Introduction

KP Elementary & Secondary Education Department has announced E-Transfer Policy for transfer/posting of Teaching staff the province. The policy has been implemented through an online application available online at <http://etransfer.kpese.gov.pk>

1.1 eTransfer Web Portal:

URL/ Address

Enter the Application URL in the browser using the following Address:

E.g. <http://etransfer.kpese.gov.pk/Login.aspx> (It will be provided by your office's IT staff)

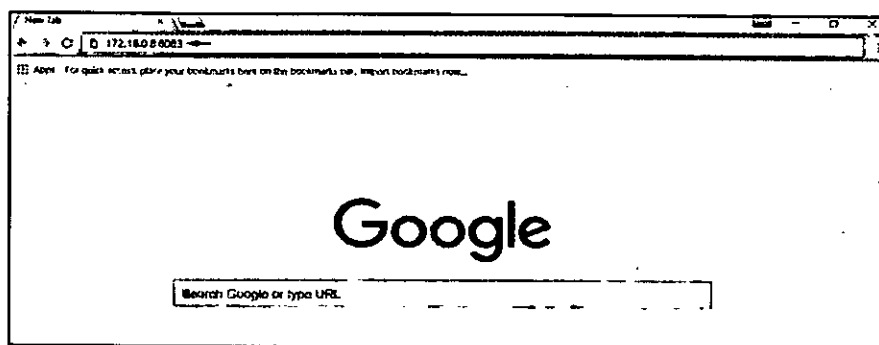


Figure:1. URL

1.2 How to Log In

Web & Android based CMS Management Portal

When you enter the URL, you will get a login window as below

- Enter User Name.
- Enter Password.
- Click on sign in button.

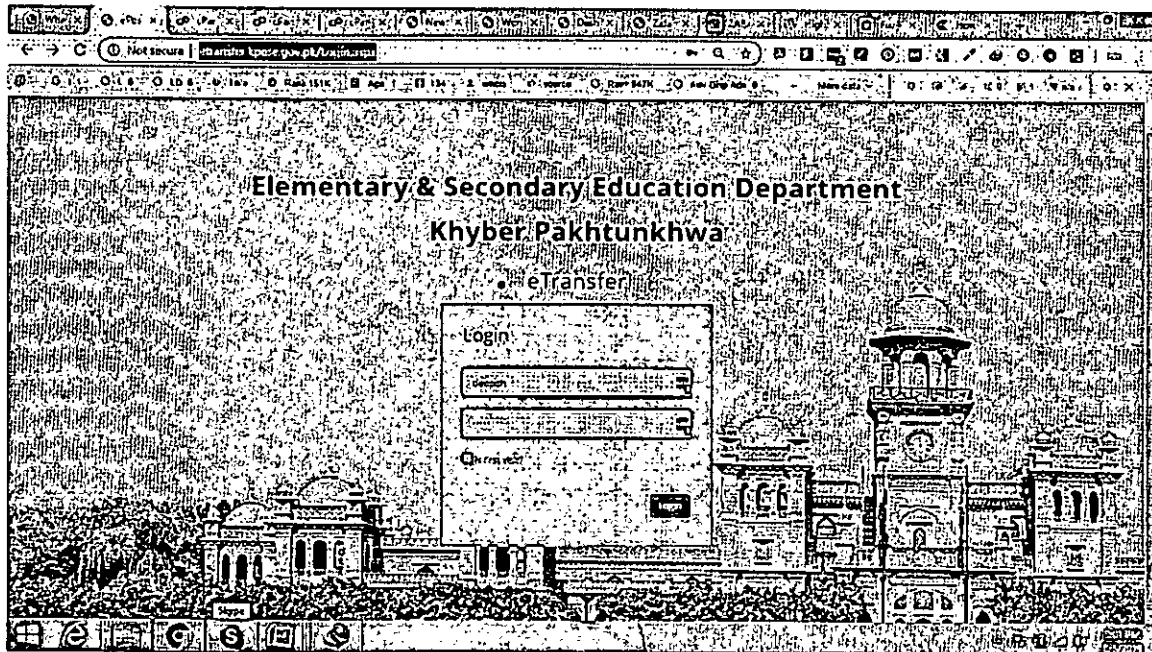


Figure:2 Login

1.3 Management Portal

Once login is done Clicking on the sign in button will take you to the CMS Home page and start using with the Application.

CMS Interface consist of the following options:

Dashboard: An index page showing summary of transfer application received per school.

1. **Sanction Post:** Shows a list of vacant posts added/announced by the concerned DEO.
 - **Posts:** Shows the list of posts in the list
 - **School:** Shows list of schools.
2. **Applications:** Shows merit list of the applications received. Merit list can be narrow down to school and post level by filtering through the search form.
3. **Transfer Order:** Show a list of applications eligible for transfer and a generate button to generate the order in pdf format.

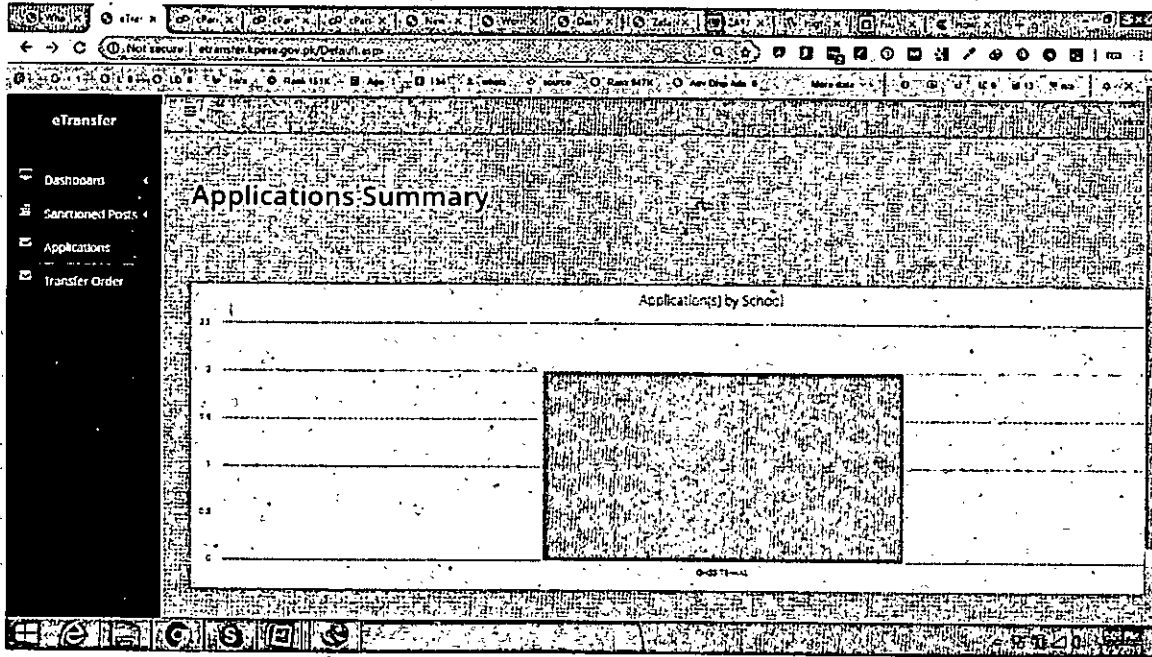


Figure 3 .CMS Management Portal

1.4 Change password:

The system has the ability for admins to change their password.

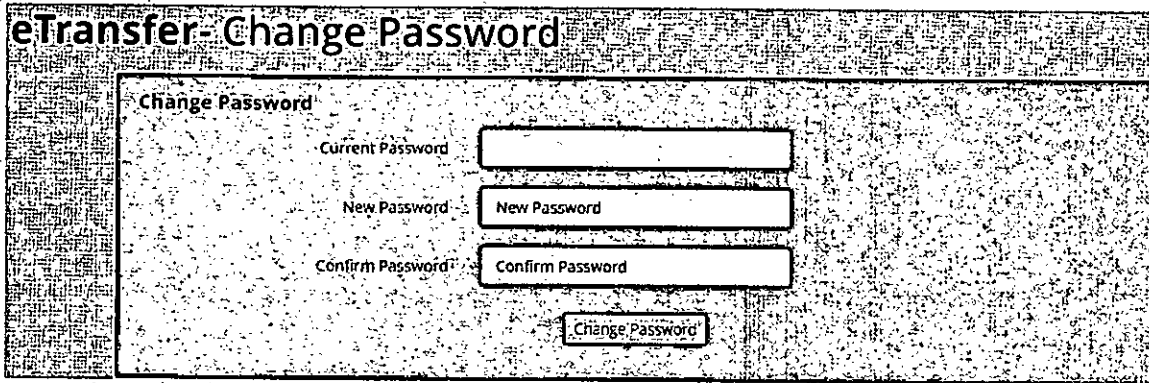


Figure.4. Change password

Chapter # 2

2.1 Sanctioned Post(s)

This page shows a list of all the vacant posts added/announced by the concerned DEO; a form to filter down results to school / post level and an "Add More" to add new vacant post(s).

SERIAL #	EMISCODE	SCHOOL NAME	DISTRICT	GENDER	LEVEL	DESIGNATION	BPS	NO OF POST(S)	ACTION(S)
1	20678	GPS AFGHAN COLONY NO.1	PESHAWAR	Boys	Primary	CT	14	1	Announced
2	20630	GPS AFRIDI ABAD PHANDU ROAD	PESHAWAR	Boys	Primary	CT	12	3	Announced
3	34234	GHSS HARYAMA BALA	PESHAWAR	Boys	Higher Secondary	CT	15	1	Announced
4	36095	GCMHSS PESHAWAR CITY	PESHAWAR	Boys	Higher Secondary	CT	15	1	Announced
5	34928	GHSS GHARI SHERDAD	PESHAWAR	Boys	Higher Secondary	T.T	15	1	Announced
6	36660	GHSS TEHKAL	PESHAWAR	Boys	Higher Secondary	T.T	15	1	Announced
7	39710	GMS SARKHANA	PESHAWAR	Boys	Middle	T.T	15	1	Announced

Figure 5. Sanction Role

2.2 Adding Vacant post

The concern DEOs will enter new post from their list of vacant posts.

Here they will select school, post Designation, BPs, and No of post which he/She want to create.

Figure. 6. ADD Vacant Post

2.3 Applications

Shows merit list of the applications received. Merit list can be narrow down to school and post level by filtering through the search form.

SERIAL #	TEACHER NAME	CNIC	PERSONAL NO	SCHOOL NAME	EMIS CODE	POST APPLIED FOR	SCORE	STATUS	ACTION(S)
1	AZULIJEHAN	172018572201	731877	GHS TEHIAL	12640	TA	40,000	Verified	View
2	ARSHAD HUSSAIN	1720178572157	739985	GHS TEHIAL	12640	TA	55,000	Verified	View

Figure 7 View Application.

The highlighted Status shows

- Status: shows whether the application is verified or not by the concerned DEO, by default this will be "not verified". The DEO can change it to verify after receiving attested copy of the application in hard form.
- Action button DEOs can View the selected teacher application.

2.4 Search application from the list

In DEO can filter the search by the School and post

- School wise
- Post wise.

We select option will related school application or related post application or both from the list from database.

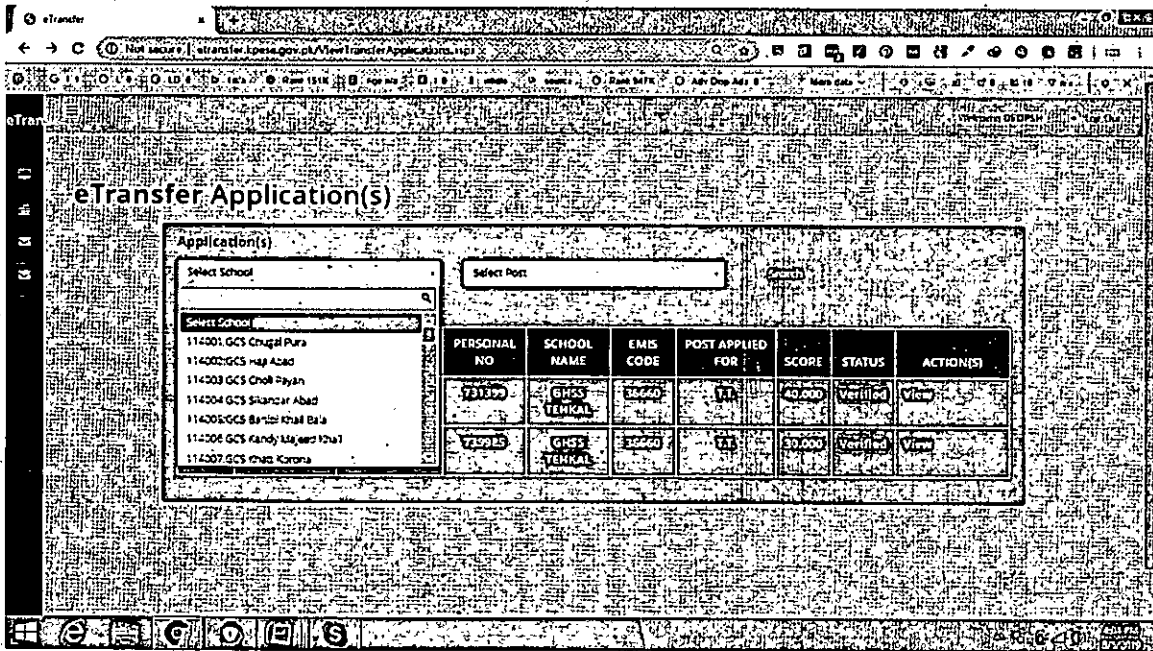


Figure. 8 search Applications

2.5 Generate Transfer order automatically.

Show a list of applications eligible for transfer and a generate button to generate the order in pdf format.

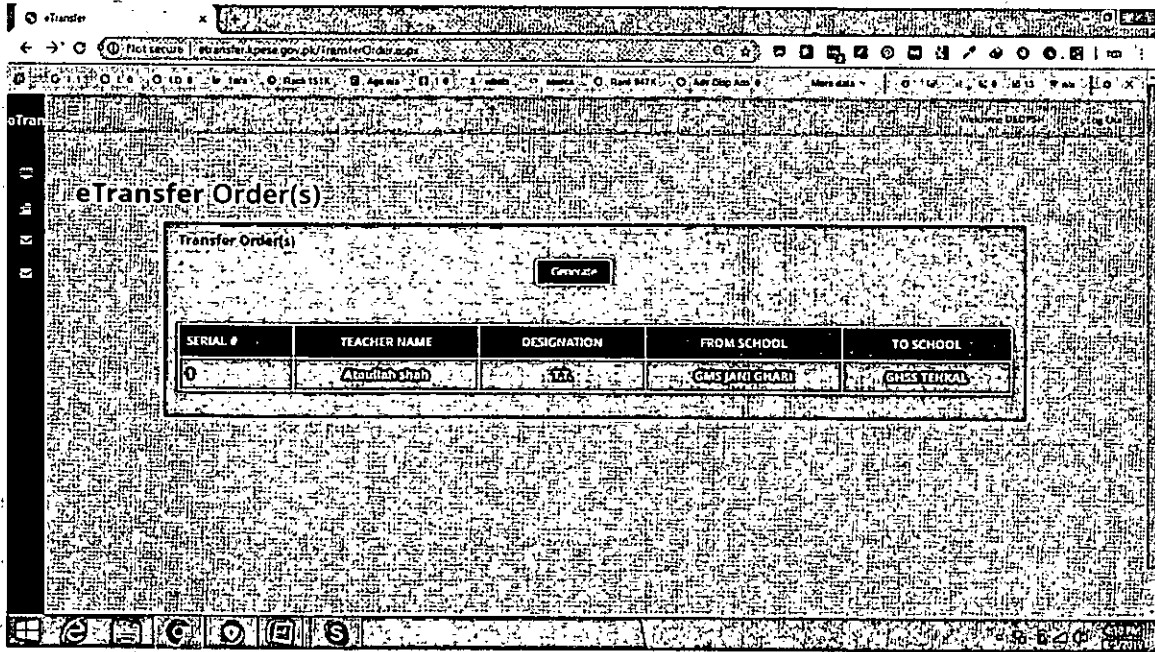


Figure9 device to server

Chapter # 3

3.1 Applicant/Teacher login

The Applicant/Teacher will use his/her CNIC as a login name and will use his/her entered password for the first time and can change password after login.

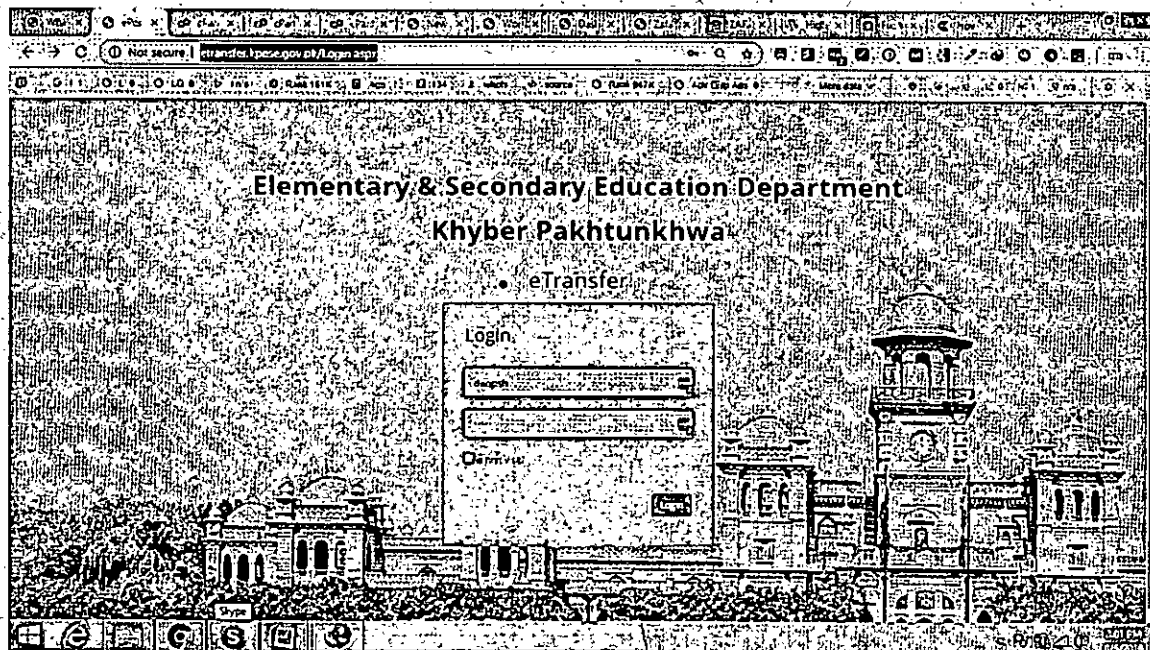


Figure 10. Applicant Login

3.2 Change password:

The Applicant can change the password after his/her first login.

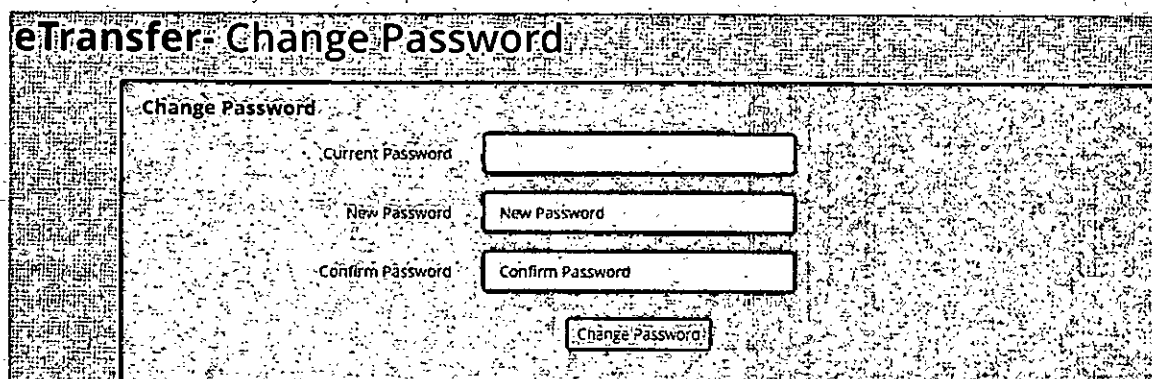
The image shows a web browser window displaying the "Change Password" page. The page title is "eTransfer- Change Password". The main content area contains a "Change Password" section with three input fields: "Current Password", "New Password", and "Confirm Password". Below these fields is a "Change Password" button. The background of the page is a light, textured pattern.

Figure.11. Change password

3.3 Filling Teacher/Application Form

The Applicant/Teacher are required to fill/edit the below form exactly as per actual record. The Mandatory fields are indicted by asterisk (*). Moreover, the Applicants claiming chronic diseases, physical disability or spouse benefit will have to produce documentary evidence to the verifying and authentication authorities.

Transfer Application

A. Personal Information

Name:

Registration No.: **Gender:**

Mobile No.: **State:**

Subject: **Use of comma separated values:**

Marital Status:

Religion: **Sex:**

Organization: **Phone:** **Select District:**

Address: **EDUIN #:**

Service Details

Service No.: **AT:**

Post Details

Sl. No.	Post Name	School/Place of Posting	From	To
1	<input type="text" value="Select"/>	<input type="text" value=""/>	<input type="text" value=""/>	<input type="text" value=""/>
2	<input type="text" value="Select"/>	<input type="text" value=""/>	<input type="text" value=""/>	<input type="text" value=""/>
3	<input type="text" value="Select"/>	<input type="text" value=""/>	<input type="text" value=""/>	<input type="text" value=""/>

Transfer Details

Level: **Subject:**

Category: **State:**

Post: **District:**

EDUIN #: **Religion:**

B. Working Conditions and Data

Residence in Home:

C. Select Institute/Working Post

Priority	Entity Code / School Name	Post Requested for Transfer	Change New Station (NMS)
1	<input type="text" value="Select School"/>	<input type="text" value="Select"/>	<input type="text" value="New"/>
2	<input type="text" value="Select School"/>	<input type="text" value="Select"/>	<input type="text" value="N/A"/>

Figure. 12. Teacher/Applicant Form

3.4 Submission and printing of application form

After complete filling of the form the applicant/teacher will submit his/her application form and will take print of the submitted form. (Note: after submission and printing of the form no changes in the application form will be allowed.)

The applicant/teacher will sign the printed form and will then verify it from his/her immediate supervisor i.e. head of his/her school or any other where the case may be.

The applicant teacher will submit the verified form in his/her respective DEO office.

Note: *Minimum tenure for eTransfer in Plain Area is 3 years while in Hard Area is 1.5 years.*

Scoring Indicators - Annexures

4.1 Scoring Criteria for Teachers up to BPS 16 except SSTs (Score – 80)

1. **Distance of present school to the desired school (in KM) – 20 marks**
 - a. Within 5 KM – 0 marks
 - b. Within 10 KM – 5 marks
 - c. Within 15 KM – 10 marks
 - d. Within 20 KM – 15 marks
 - e. Greater than 20 KM – 20 marks
2. **Hard Area - 10 marks**
 - a. Normal tenure (within 1.5 years) – 0 marks
 - b. Tenure at hard area (from 1.5 to 3 years) – 4 marks
 - c. Tenure at hard area (from 3 to 5 years) – 7 marks
 - d. Tenure at hard area (more than 5 years) – 10 marks
3. **STR (Total number of Students in the school / Total number of Teachers) - 10 marks (IMU data Source)**
 - a. STR at present school is greater than the Desired school - 0 marks
 - b. STR at present and the desired school are equal or at the same level – 5 marks
 - c. STR at the present school is less than desired school – 10 marks
4. **Chronic Disease – 10 marks**

10 marks will only be awarded for chronic diseases (as per notified chronic diseases). A certificate in this regard will be required from Standing Medical Board.
3. **Disability – 10 marks**

10 marks will only be awarded only to those with Physical Disability. Proof required will be Special person CNIC + Standing Medical Board disability certificate
6. **Domicile -10 marks**

10 marks will be awarded to those when the desired school is in his/her district of domicile
7. **Spouse – 10 marks**

10 marks will be awarded to those whose spouse is posted in the district where the desired school is situated and the desired district is the domiciled district of the applicant.

4.2 For Secondary School Teachers (SSTs) (Score – 100)

- 1. Distance of present school to the desired school (in KM) – 20 marks**
 - a. Within 5 KM – 0 marks
 - b. Within 10 KM – 5 marks
 - c. Within 15 KM – 10 marks
 - d. Within 20 KM – 15 marks
 - e. Greater than 20 KM – 20 marks

- 2. Hard Area - 10 marks**
 - a. Normal tenure (within 1.5 years) – 0 marks
 - b. Tenure at hard area (from 1.5 to 3 years) – 4 marks
 - c. Tenure at hard area (from 3 to 5 years) – 7 marks
 - d. Tenure at hard area (more than 5 years) – 10 marks

- 3. STR (Total Number of Students in Class 9 & 10 / Number of SST) - 10 marks (IMU data Source)**
 - a. STR at present school is greater than the Desired school - 0 marks
 - b. STR at present and the desired school are equal or at the same level – 5 marks
 - c. STR at the present school is less than desired school – 10 marks

- 4. Chronic Disease – 10 marks**

10 marks will only be awarded for chronic diseases (as per notified chronic diseases). A certificate in this regard will be required from Standing Medical Board.

- 5. Disability – 10 marks**

10 marks will only be awarded only to those with Physical Disability. Proof required will be Special person CNIC + Standing Medical Board disability certificate

- 6. Domicile -10 marks**

10 marks will be awarded to those when the desired school is in his/her district of domicile.

- 7. Spouse – 10 marks**

10 marks will be awarded to those whose spouse is posted in the district where the desired school is situated and the desired district is the domiciled district of the applicant.

- 8. Annual SSC Result (of the subjects taught by the teacher) working in High/Higher Secondary Schools – 20 Marks**
 - a. 90% or above – 20 marks, b. 80% to 90% - 15 marks, c. 70% to 80% - 10 marks, d. 60% to 70% - 5 marks, e. Below 60% - 0 marks.

OR**For SSTs (General) working in Middle/Primary Schools – 20 Marks****Overall Students Attendance Rate Percentage as per IMU data**

- a. 90% or above – 20 marks, b. 80% to 90% - 15 marks, c. 70% to 80% - 10 marks, d. 60% to 70% - 5 marks, e. Below 60% - 0 marks.

4.3 For Subject Specialists (SS) (Score – 100)

1. **Distance of present school to the desired school (in KM) – 20 marks**
 - a. Within 5 KM – 0 marks
 - b. Within 10 KM – 5 marks
 - c. Within 15 KM – 10 marks
 - d. Within 20 KM – 15 marks
 - e. Greater than 20 KM – 20 marks

2. **Hard Area - 10 marks**
 - a. Normal tenure (within 1.5 years) – 0 marks
 - b. Tenure at hard area (from 1.5 to 3 years) – 4 marks
 - c. Tenure at hard area (from 3 to 5 years) – 7 marks
 - d. Tenure at hard area (more than 5 years) – 10 marks 250+

3. **Number of Students in Class-11 & 12 in the relevant subject - 10 marks**
 - a. Number of Students at present school is greater than the Desired school - 0 marks
 - b. Number of Students at present and the desired school are equal or at the same level – 5 marks
 - c. Number of Students at the present school is less than desired school – ~~10~~ marks

4. **Chronic Disease – 10 marks**

10 marks will only be awarded for chronic diseases (as per notified chronic diseases). A certificate in this regard will be required from Standing Medical Board.

5. **Disability – 10 marks**

10 marks will only be awarded only to those with Physical Disability. Proof required will be Special person CNIC + Standing Medical Board disability certificate

6. **Domicile -10 marks**

10 marks will be awarded to those when the desired school is in his/her district of domicile K

7. **Spouse – 10 marks**

10 marks will be awarded to those whose spouse is posted in the district where the desired school is situated and the desired district is the domiciled district of the applicant.

8. **Annual HSSC Result (of the subjects taught by the teacher) – 20 Marks**
 - a. 90% or above – 20 marks
 - b. 80% to 90% - 15 marks
 - c. 70% to 80% - 10 marks
 - d. 60% to 70% - 5 marks

Below 60% - 0 marks.

4.4 For Principals / Head Masters of High/Higher Secondary Schools (Score – 120)

1. **Distance of present school to the desired school (in KM) – 20 marks**
 - a. Within 5 KM – 0 marks
 - b. Within 10 KM – 5 marks
 - c. Within 15 KM – 10 marks
 - d. Within 20 KM – 15 marks
 - e. Greater than 20 KM – 20 marks
2. **Hard Area - 10 marks**
 - a. Normal tenure (within 1.5 years) – 0 marks
 - b. Tenure at hard area (from 1.5 to 3 years) – 4 marks
 - c. Tenure at hard area (from 3 to 5 years) – 7 marks
 - d. Tenure at hard area (more than 5 years) – 10 marks
3. **STR (Total number of Students in the school / Total number of Teachers) - 10 marks (IMU data Source)**
 - a. STR at present school is greater than the Desired school - 0 marks
 - b. STR at present and the desired school are equal or at the same level – 5 marks
 - c. STR at the present school is less than desired school – 10 marks
4. **Chronic Disease – 10 marks**

10 marks will only be awarded for chronic diseases (as per notified chronic diseases). A certificate in this regard will be required from Standing Medical Board.
5. **Disability – 10 marks**

10 marks will only be awarded only to those with Physical Disability. Proof required will be Special person CNIC + Standing Medical Board disability certificate
6. **Domicile -10 marks**

10 marks will be awarded to those when the desired school is in his/her district of domicile
7. **Spouse – 10 marks**

10 marks will be awarded to those whose spouse is posted in the district where the desired school is situated and the desired district is the domiciled district of the applicant.
8. **Annual SSC & HSSC Result of the School – 20 Marks**
 - a. 90% or above – 20 marks, b. 80% to 90% - 15 marks, c. 70% to 80% - 10 marks, d. 60% to 70% - 5 marks, e. Below 60% - 0 marks.
9. **Overall Students Attendance Rate Percentage as IMU data – 20 Marks**
 - a. 90% or above – 20 marks, b. 80% to 90% - 15 marks, c. 70% to 80% - 10 marks, d. 60% to 70% - 5 marks, e. Below 60% - 0 marks.