

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

SERVICE APPEAL NO. 738/2015

Date of institution ... 02.07.2015

Date of judgment ... 16.05.2017

Shahid Anwar S/O Aman Ullah,
R/O Shakkardara presently posted as PST, Government Primary School
Salim Abad, Sumari Payan, Tehsil & District Kohat.

... (Appellant)

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Peshawar.
2. Director Elementary & Secondary Education, Peshawar.
3. District Education Officer (Male) Elementary & Secondary Education, K.D.A Kohat.
4. Sub-Divisional Education Officer (Lachi) Kohat.

... (Respondents)

APPEAL UNDER SECTION-4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER DATED 03.10.2013 WHEREBY THE APPELLANT HAS BEEN TRANSFERRED FROM GOVERNMENT PRIMARY SCHOOL SPINKI KILLA TO GOVERNMENT PRIMARY SCHOOL SALEEM ABAD.

Mr. Hassan UK. Afridi, Advocate.

.. For appellant.

Mr. Ziaullah, Deputy District Attorney

.. For respondents.

MR. MUHAMMAD AMIN KHAN KUNDI

.. MEMBER (JUDICIAL)

MR. GUL ZEB KHAN

.. MEMBER (EXECUTIVE)

JUDGMENT

MUHAMMAD AMIN KHAN KUNDI, MEMBER The appellant was appointed as Primary School Teacher (BPS-7) on 26.06.1997. He was performing his duty in Government Primary School Spinki Killa Union Council Shakardara when on 03.10.2013 he was transferred from Government Primary School Spinki Killa Union Council Shakardara Rural-I to Government Primary School Salim Abad Union Council Sumari Payan district Kohat. Aggrieved from the said transfer order he also

filed departmental appeal but no response received from the respondents, therefore, filed the present service appeal.

2. Respondents were summoned who submitted written reply.

3. Learned counsel for the appellant contended that the transfer order of the appellant passed by the respondents is illegal. It was further contended that there was ban of all kind of posting/transfer at the time of transfer of the appellant. It was further contended that the transfer of the appellant is against the spouse policy. It was further contended that the appellant has been transferred due to political pressure and influence, therefore, prayed that the transfer order of the appellant may be set-aside and the appellant may be adjusted in other school located in his Union Council Shakardara.

4. On the other hand learned Deputy District Attorney for the respondents opposed the contention of learned counsel for the appellant and contended that the appellant had completed his tenure in the Government Primary School Spinki Killa and was transferred in the best interest of public. It was further contended that the appellant has been promoted to BPS-14 through order dated 11.06.2014 and the appellant has assumed the charge of the said post therefore, this appeal is not maintainable. It was further contended that the appellant has filed the departmental appeal on 07.10.2013 while the present service appeal has been filed on 02.07.2015 almost after 20 months, whereas the appellant was required to file the present appeal within 120 days, therefore, it was vehemently contended that the present appeal is badly time barred. It was further contended that the appellant has also not impleaded one Jalil-ur-Rehman as a party who was transferred to Government Primary School Spinki Killa at place of appellant therefore, the appeal is not maintainable and liable to be dismissed.

5. We have heard the arguments on both sides and have gone through the record.

6. Perusal of the record reveals that the appellant was performing his duty as Primary School Teacher in Government Primary School Spinki Killa Union Council

M. Amin
16.5.2017

Shakardara. The respondents transferred the appellant from the said school to Government Primary School Salim Abad Union Council Sumari Payan district Kohat vide order dated 03.10.2013 and one Jalil-ur-Rehman Primary School Teacher was transferred from Government Primary School Salim Abad to Government Primary School Spinki Killa in place of appellant but the appellant has not impleaded the said Jalil-ur-Rehman in this service appeal. Furthermore, the appellant has filed a departmental appeal on 07.10.2013 against the transfer order dated 03.10.2013 but he has filed present service appeal on 02.07.2015 after more than 20 months, therefore, the present service appeal is also badly time barred, therefore, we see no merit in the appeal hence, the same is dismissed. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED

16.05.2017


(GUL ZEB KHAN)
MEMBER


(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

16.05.2017

Counsel for the appellant present. Mr. Habibullah, SDO alongwith Mr. Ziaullah, Deputy District Attorney for the respondents also present. Arguments heard and record perused.

Vide our detailed judgment of today consisting of three pages placed on file, we see no merit in the appeal hence, the same is dismissed. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED

16.05.2017


(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

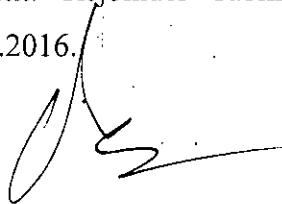

(GUL ZEB KHAN)
MEMBER



16.05.2016

Agent to counsel for the appellant and Addl. AG for respondents present. Rejoinder submitted. To come up for arguments on 29.8.2016.

Member



Member



29.08.2016

Junior to counsel for the appellant and Additional AG for respondents present. Requested for adjournment as senior counsel for the appellant is not in attendance today. Adjourned for final hearing to 30.12.2016 before D.B.

Member



Chairman



30.12.2016

Clerk to counsel for the appellant and Mr. Habibullah, SDO alongwith Addl. AG for respondents present. Arguments could not be heard due to incomplete bench. Case adjourned to 16.05.2017 for arguments before D.B:

Chairman



28.07.2015

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was serving as PST when transferred vide impugned order dated 3.10.2013 from Union Council Shakardara Tehsil Lachi to Tehsil Kohat. That the appellant preferred department appeal for annulment of the transfer from his domestic union council on 16.3.2015 which was not responded and hence the instant service appeal on 2.7.2015.

That the transfer of the appellant from union council Shardardara Tehsil Lachi to Tehsil Kohat is violative of law and dictum laid down by this Tribunal in case of Muhammad Afzal vide judgment dated 9.2.2015. That the appellant is also entitled to similar treatment as laid down by the august Supreme Court of Pakistan in case law reported as NLR 2010 (Services) 34 and 2009 SCMR 1.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 26.10.2015 before S.B.


Chairman

26.10.2015

Dr. Saadullah Jan on behalf of the appellant and Mr. Muhammad Ilyas, SDEO, Lachi alongwith Addl: A.G for respondents present. Requested for adjournment. To come up for written reply/comments on 28.01.2016 before S.B.


Chairman

28.1.2016

Appellant with counsel, M/S Khurshid Khan, SO and Muhammad Ilyas, SDEO, Lachi alongwith Assistant AG for respondents present. Written reply submitted. The appeal is assigned to D.B for rejoinder and final hearing for 16.5.2016.


Chairman




Appellant Deposited
Security & Process Fee



Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 738/2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	02.07.2015	<p>The appeal of Mr. Shahid Anwar presented today by Mr. Hassan U.K Afridi Advocate, may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p>
2	2-7-15	<p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>3-7-2015</u></p> <p style="text-align: right;"> CHAIRMAN</p>
3	03.07.2015	<p>None present for appellant. The appeal be relisted for preliminary hearing for 28.7.2015 before S.B.</p> <p style="text-align: right;"> Chairman</p>

Before the Khyber Pakhtoonkhwa Service Tribunal Peshawar

Service Appeal 738 2015

Shahid Anwar S/O Aman Ullah R/O Shakkardara presently posted at PST, Government Primary School Salim Abad, Sumari Payan, Tehsil & District Kohat(Appellant)
VS

5. Government Of Khyber Pakhtoonkhwa through secretary Elementary & Secondary Education, Peshawar .
6. Director Elementary & Secondary Education, Peshawar .
7. District Education Officer (Male) Elementary Secondary Education, K.D.A.Kohat.
8. Sub Divisional Educational Officer (Lachi).(Respondent)

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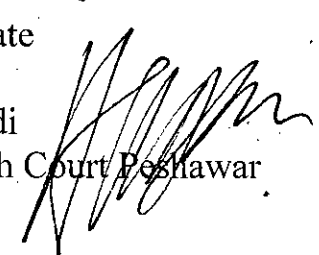
1. Civil appeal address of the parties. 1-4
2. Appointment order 5-6
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4. order/judgment of Honorable Tribunal 9.2.15 8-9
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Through

Appellate
Hassan UK.Afridi
Advocate of High Court Peshawar

Dated 02-07-2015

26
Sh. Anwar



Before the Khyber Pakhtoonkhwa Service Tribunal Peshawar

Service Appeal 738 2015

①
N.W.F. Province
Service Tribunal

Diary No. 758
Dated 02-7-2015

Shahid Anwar S/O Aman Ullah R/O Shakkardara presently posted at PST, Government Primary School Salim Abad, Sumari Payan, Tehsil & District Kohat (Appellant)

VS

1. Government Of Khyber Pakhtoonkhwa through secretary Elementary & Secondary Education, Peshawar .
2. Director Elementary & Secondary Education, Peshawar .
3. District Education Officer (Male) Elementary Secondary Education, K.D.A.Kohat.
4. Sub Divisional Educational Officer (Lachi) Kohat (Respondents)
(ms)

Service appeal U/S 4 Govt, of K.P.K service tribunal Act 1974 against the impugned order/judgment passed by the respondent No.3 vide dated 3.10.2013 whereby the Honorable Tribunal set-side the said order in service appeal No.103/2014 and directed the respondents to transfer of the such appellant from the school in this union council consider strictly in accordance with s.3 of the KPK (appointment deputation promotion posting and transfer of teacher instructors and doctor regulatory Act 2011, so in view of the judgment of Hon, supreme court " 1996 SCMR 1185 " 2009 SCMR -I the present appellant may be treated as their collages treated by this Honorable tribunal in the above mentioned appeal.

Prayers in Appeal:-

On acceptance of this appeal the impugned order/judgment , dated 3.10.2013 passed by the respondent No. 3, may kindly be set-aside and the present appellant may please be adjusted/transfer for the school in his union council Shakkardara in accordance of section 3 of Act as mentioned above as decided by this Honorable tribunal in service appeal No.103/2014 dated 9.2.2015 in view of the judgment of August supreme court of Pakistan " 1996 SCMR 1185 " " 2009 SCMR I " by treating the appellate as other collages have been treated.

Further that the appellate may kindly be adjusted under the spouse policy as the wife of appellate is serving in government girls primary school (GGPS) No.3 located in union council Shakkardara urban.

Any other relief the Honorable tribunal may deem fit for the safe administration of justice.

Respectfully Shewth :-

- 2/7/15
Registrar
1. That the appellant was appointed as PTC Teacher (BPS-07) on 26.06.1997 .
(Copy of appointment letter is attached).
 2. That the appellant belongs to union council Shakkardara Urban Tehsil Lachi.
 3. That the appellant was performing his duties as PST, in government primary school, Spinki Killa union council Shakardara.
 4. That the respondent No.3 tranfered the appellant from GPS Spinki Killa union council Shakardara Rural I to government primary school Salim Abad union

council Sumari Payan Tehsil & District Kohat vide dated 3.10.2015 purly/political grounds. (Copy of order is attached).

5. That the appellatant filed departmental appeal against the said order but no reply received by the appellatant.
6. That Mr.Mohammad Afzal and Mohammad Khursheed who were also aggrieved from the impugned order dated 3.10.13 which was accepted and the Honorable tribunal of KPK vide order dated 9.2.2015 directed the respondents to consider transfer of the appellatant from the said school in this union council strictly in accordance with section.3 of the KPK appointment, deputation, promotion Lectures and transfer of teachers instruction and doctors regularly Act 2011. So in view of the said judgment the respondents are bound to treat the present appellatant as per their colleges as mentioned above.
8. That the appellatant filed departmental appeal before the respondents for the said facility as led down the August supreme court but in vain and the appellatant also requested for his adjustment under spouse policy but no reply received here this appeal in the following amongst the other grounds.

Grounds:-

- A. That the appellatant is entitled to be treated at per with their colleges already being granted the facility and the deniel of the respondent is illegal and against the constitution and legal right of the appellatant.
- B. That the Honorable apex court is very much clear on the point that if the tribunal or this court decide a point of law relating to the term of service of a civil servant which cover not only case of civil servant who litigated but also of others civil servant who may have not taken any legal proceedings be extended to other civil servant who may not be party to the above litigation.
- C. That the impugned order passed by the respondent No.3 vide dated 3.10.2013 has already been set-aside by this Honorable tribunal vide dated 9.2.2015 and the respondent have been directed through the said order to consider transfer of the colleges of the appellatant from the school of own union council strictly in accordance with section.3 of the Act as mentioned above so in this regard in view of the above judgment the appellatant is also entitled to transfer him to his own union council near to his union council.
- D. That keeping in view the arbitrating and discriminatory attitude of the respondents with the appellatant which is obviously against the dicta of the article 25 of the constitution of Pakistan 1973.
- E. That according to the Honorable apex court judgment as " 1996 SCMR 1185 " "2009 SCMR I " " PLD 2010 SC 878 " the appellatant is entitled to treat him as to his other colleges been transferred to their own union council.
- F. That the appellatant has been transferred from his own union council GPS Spinke Killa union council Shakardar Rural -I Tehsil Lachi to GPS Salam Abad union council Sumari Payan Tehsil & District Kohat which is against the regulatory Act 2011, and which is far away about 70 KM.
- G. That at the time of transfer of the appellatant there was complete ban on all kinds of posting/transfer vide notification No. 1900-2002/F.No.69/vol -11/P-I transfer G Branch dated 19.3.2013.
- H. That the appellatant is also entitled under the spouse policy to transfer him in the union council where his wife serving as PST teacher government girls primary school (GGPS) No.3 located in union council Shakardar further that the son of the appellatant is physically disable and need proper care/treatment. So in this Humanitarian ground the appellatant is also entitled of the transfer of the union council where his wife is serving .

- I. That the respondents are fully aware about all regulations/Rules and decision of the Apex court therefore are liable for strict disciplinary action/contempt of court
- J. That the impugned transfer order is the result of political pressure and political influence, which is highly objectionable and against the dictum of apex court.
- K. That some other grounds may kindly be adduced at the time of ~~argument~~ *argument*.

It is therefore humbly prayed that On acceptance of this appeal the impugned order/judgment , dated 3.10.2013 passed by the respondent No. 3, may kindly be set-aside and the present appellant may please be adjusted/transfer for the school in his union council Shakkardara in accordance of section 3 of Act as mentioned above as decided by this Honorable tribunal in service appeal No.103/2014 dated 9.2.2015 in view of the judgment of August supreme court of Pakistan “ 1996 SCMR 1185 “ “ 2009 SCMR 1 “ by treating the appellate as other collages have been treated.

Further that the appellate may kindly be adjusted under the spouse policy as the wife of appellate is serving in government girls primary school (GGPS) No.3 located in union council Shakkardara urban.

Any other relief the Honorable tribunal may deem fit for the safe administration of justice.

S. Anwar

Appellate

Through

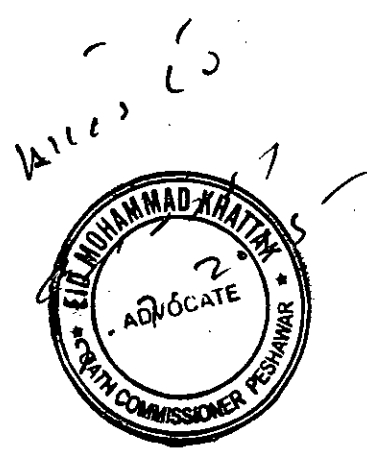
Hassan UK Afridi
Advocate of High Court Peshawar

Dated 02-07-2015

Affidavit

I Hassan UK Afridi Advocate High court Peshawar as per intmtion of my client do hereby solemnly affirm and declare on oath that the content of this appeal are true and correct to the best of my knowledge and belief and nothing has been cancelled from this Honorable Court.

Dependent
[Signature]



4

Before the Khyber Pakhtoonkhwa Service Tribunal Peshawar

Service Appeal _____ 2015

Addresses of parties

Shahid Anwar S/O Aman Ullah R/O Shakkardara presently posted at PST, Government Primary School Salim Abad, Sumari Payan, Tehsil & District Kohat (Appellant)

VS

1. Government Of Khyber Pakhtoonkhwa through secretary Elementary & Secondary Education, Peshawar .
2. Director Elementary & Secondary Education, Peshawar .
3. District Education Officer (Male) Elementary Secondary Education, K.D.A.Kohat.
- 4 .Sub Divisional Educational Officer (Lachi) . *Kohat* (Respondents)

Appellate

S. Anwar

Through

Hassan UK Afridi
Advocate of High Court Peshawar

Dated 02-07-2015

Office of the District Education Officer (Male) Primary Kohat
Office (male) P. T. Kohat

5

NOTIFICATION

Consequent upon their selection by the Departmental Selection Committee, the District Education Officer (Male) Primary Kohat has been pleased to appoint the following trained P.T.C. candidates at the schools noted against their names in EPS-7(1480-81-2695) plus usual allowances as admissible under the rules with immediate effect subject to the existing terms and conditions:-

S. NO.	NAME OF CANDIDATE WITH FATHER NAME AND ADDRESS	D/O BIRTH	NO OF MERIT	SCHOOL WHERE POSTED	REMARKS
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DISTRICT MERIT APPOINTMENT

1.	Mehboob Bala S/o Mohd Yasin R/o Meri Col: Kohat.	26.12.73	1/71.33	GPS City Centre Kohat vice Mohd Ali terminated.	
2.	Mohd Atif S/o Mohd Inayat R/o Sohaili Kohat	01.4.73	2/71	GPS Sooba terminated.	
3.	Mohammad Ameer S/o Mohd Rafiq R/o Shino Khel Kohat.	10.3.74	3/71	GPS Bane Khalilur terminated.	
4.	Mohammad Saleem S/o Mohd Fabeem R/o Shadi Khel	15.11.74	4/71	GPS Kamal Khel vice Tufail Ahmad terminated.	
5.	Mohd Anwar S/o Amanullah R/o Shakardara	06.4.71	5/69.66	GPS Garyo Par vice Intizar Khan terminated.	
6.	Wahidullah S/o Adam Khan R/o Ashiq Col: Kohat.	15.3.71	6/69.33	MPS Saro Khel vice Fazal Noor terminated.	
7.	Mohammad Tahir S/o Mohd Ishaq R/o Gumat	1.1.74	7/68	GPS Garyo Par vice Sabir Shah terminated.	
8.	Mohammad Ismail S/o Gul Zarin R/o Chashmi Saghri	14.4.74	8/67	MPS Dh: Sahib Khan already occupied by him.	
9.	Javed S/o Rais Khan. R/o Togh	01.5.74	9/67	GPS Abbasi Banda already occupied by him.	
10.	Mohdullah S/o Mohd Khan R/o Shakardara	01.1.76	10/65	GPS Chappri Saghri already occupied by him.	
11.	Zulfiqar Ali S/o Dildar Shah R/o College Town Kohat	30.8.77	11/65	GPS Haji Abad (Kharmatoo) vice Dost Mohd terminated.	
12.	Sajid Nazir S/o Nazir Bul R/o Mir Ahmad Khel Kohat	11.4.73	12/62	GPS Kharmatoo vice Mushtaq Ahmad terminated, due to low merit.	
13.	Asif Faqir S/o Faqir Khan R/o Lachi	18.3.71	13/61	GPS Karbogha No. vice Mohd Riaz terminated due to low merit.	
14.	Saifur Rehman S/o Taimur Shah R/o Meri Col: Kohat	01.5.73	14/61	GPS Kat Garh vice Talib Jan terminated due to low merit.	
15.	Iqbal Mehmood S/o Umar Khan R/o Bori Saghri	04.1.74	15/61	GPS Bhall No.2 vice Ehab Nawaz terminated due to low merit.	

copy of 1st Appointment order dated 26/6/1997

Handwritten signatures and initials.

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) PRIMARY KOHATNOTIFICATION

Consequent upon their selection by the Departmental Selection Committee, the District Education Officer (Male) Primary Kohat has been pleased to appoint the following trained PTC candidates at the schools noted against their names in BPS-7 (1480-81-2695) plus usual allowances as admissible under the rules with immediate effect subject to the existing terms and conditions

S.N	Name of candidates with father name and address	D/o Birth	No of Merit	School where posted	Remarks
DISTRICT MERIT APPOINTMENT					
1.	Mehboob Elahi S/o Muhd Yasin R/o Meri Col. Kohat	26.12.73	1/71.33	GPS City Centre Kohat Vice Muhd Ali terminated	-do-
2.	Muhd. Atif S/o Muhd. Inayat R/o Moh. Niazi Kohat	01.4.73	2/71 Sooba		-do-
3.	Muhammad Ameerq S/o Muhd Rafiq R/o Shino Khel Kohat	10.3.74	3/71 Khalil ur Rehman		-do-
4.	Muhammad Saleem S/o Muhd Faheem R/o Shadi Khel	15.11.74	4/71	GGPS Kamal Khel Vice Tufail Ahmad terminated	-do-
5.	Shahid Anwar S/o Amanullah R/o Shakardara	06.4.71	5/69.66	GGPS Garyo Par vice intizar Khan terminated	-do-
6.	Wahidullah S/o Adam Khan R/o Ashiq Col. Kohat	15.3.71	6/69.33	MPS Saro Khel Vice Fazal Noor Terminated	-do-
7.	Muhammad Tahir S/o Muhd Ishaq R/o Gumat	1.1.74	7/68	GGPS Garyo Par Vice Sabir Shah Terminated	-do-
8.	Muhammad Ismail S/o Gul Zarin R/o _____ Saghri	14.4.74	8/67	MPS Dh. Sahib Khan already occupied by him	-do-
9.	Javed Ibrar S/o Rais khan R/o Togh Bala	01.05.74	9/67	GGPS Abbasi Banda Already occupied by him.	-do-
10.	Rahimullah S/o Said Khan R/o Shakardara	01.1.76	10/65	GGPS Chappri Saghri already occupied by him	-do-
11.	Zulfiqar Ali S/o Dildar Shah R/o Collage Town Kohat	30.8.77	11/65	GPS Haji Abad (Karmatoo) Vice Dost Muhd terminated.	-do-
12.	Sajid Nazir S/o Nazir Bul R/o Mir Ahmad Khel Kohat	11.4.73	12/62	GPS Kharmotoo Vice _____ Ahmad _____ due to terminated low merit	-do-
13.	Asif Faqir S/o Faqir Khan R/O Lachi	18.3.71	13/61	GGPS Karbogha No.1 vice Muhd Riaz Terminated due to low merit	-do-
14.	Saifur Rehman S/o Taimur Shah R/o Meri Col. Kohat	01.5.73	14/61	GGPS Kat Gart vice Talib Jan Terminated due to low merit	-do-
15.	Ijaz Mehmood S/o Umar Khan R/o Bori Saghri	04.1.74	15/61	GPS Thall No.21 vice shah Nawaz terminated due to low merit	-do-

AH-ur-Fed

- (2/2/77) 6
4. Their inter-seniority will be determined in accordance with the merit of Departmental Selection Committee.
 5. Charge Report should be submitted to all concerned.
 6. They shall be on probation for a period of two years and will have to pass Departmental examination. In case a candidate fails to qualify the Departmental Exam: he will be given one more chance. If, he fails again then his services will be terminated. On arrival/ availability of trained teachers, the services of untrained teachers occupies the post will be terminated.
 7. Their original certificates/Degrees should be checked and verified from the concerning University/BISE/RDE and Islamic Madrassas concerned before handing over charge.
 8. Service books of the teachers must be prepared complete in all respect before handing over charge.
 9. The declaration of assets should be obtained from them immediately and placed on record.
 10. They are required to produce Health and Age Certificate from Medical Authorities concerned before taking over charge.
 11. Charge should not be given to the overage candidates. His case for age relaxation be sent to the concerned quarter.
 12. Efforts for transfer before the completion of tenure will disqualify him from the service.
 13. NO TA/DA is allowed.
 14. An undertaking shall be obtained from Master and Degree holder PTC, that they will serve the Department for at least 5 years, unless he/they are selected by the Public Service Commission for any post.
 15. In case of person appointed as an untrained teacher, he will have to pass the requisite training examination within a period of 4-years failing which his services will be terminated.

(TAIMUR JAN)
I/C DISTRICT EDUCATION OFFICER
(MALE) PRIMARY KOHAT.

Endst No. 2000/2001/2002/3/1/1 Dated: 26/6/77
Copy forwarded for information to the:-

1. Accountant General NWFP Peshawar.
2. Director of Education (Primary) NWFP Peshawar.
3. District Accounts Officer Kohat.
4. P/S to Secretary to Govt: of NWFP Education Department Peshawar.
- 5-55. Officials concerned.

Taimur Jan 26/6/77
DISTRICT EDUCATION OFFICER
(MALE) PRIMARY KOHAT.

M. H. Khan
[Signature]

4. Their inter-e-seniority will be determined in accordance with the merit of departmental Selection Committee.
5. Charge report should be submitted to all concerned.
6. They shall be on probation for a period of two years and will have to pass Departmental Examination. In case a candidate fails to qualify the Departmental Exam: he will be given one more chance. If, he fails again then his services will be terminated. On arrival/availability of trained teachers, the services of untrained teachers occupied the post will be terminated.
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11. Charge should not be given to the overage candidates. His case for age relaxation be sent to the concerned quarter.
12. Efforts for transfer before the completion of tenure will disqualify him from the service.
13. TO TA/DA is allowed.
14. An undertaking shall be obtained from Master and Degree holder PTC that they will serve the Department for at least 5 years, unless he/they are selected by the Public Service Commission for any post.
15. IN case of person appointed as an untrained teacher, he will have to failing which his services will be terminated.

Sd/-
(Taimur Jan)
District Education Officer
(Male) Primary Kohat



Endst No. _____

dated 26/6/97

Copy forwarded for information to the

1. Accountant General NWFP Peshawar.
2. Director of Education (Primary) NWFP, Peshawar
3. District Accounts Officer Kohat.
4. P/S to Secretary to Govt. of NWFP Education Departmental Peshawar.
5. Officials concerned.

Sd/-
District Education Officer
(Male) Primary Kohat

①

⑦

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KOHAT

TRANSFER

Consequent upon the approval of the competent authority, as per proposed by SDEO(M) Lachi the following PST are hereby transferred on their own pay and grade in the interest of public service, their name & school name noted against each.

No TA/DA is allowed
Charge report should be submitted to all concerned

	Name & Designation	From	To	Remarks
1	Shafiq ur Rehman PST	GPS No.1 Sur Cul	GPS Bori Saghri	VSNo.2
2	Muhammad Afzal PST	GPS Bori Saghri	GPS No.1 Sur Gul	VSNo.1
3	Nadir Perveez, PST	GPS Dh:Khajab Gul	GPS No.2 Chorlaki No.2	VSNo.4
4	Akhtar Zaman PST	GPS No.2 Chorlaki	GS Dh:Khajab Gul	VSNo.3
5	Jalil Ur Rehman PST	GPS Salim Abad	GPS Spinki Killa	VSNo.6
6	Shahid Anwar PST	GPS Spinki Killa	GPS Salim Abad	VSNo.5
7	Muhammad Tariq, PST	GPS Sudal	GPS Kiroson	Need Basic
8	Yousaf Khan, PST	GPS Shawaki	GPS No.3 S/Dara	VSNo.9
9	Akhtar Hussain, PST	GPS No.3 S/Dara	GPS Shawaki	VSNo.8
10	Zehoor ur Rehman PST	GPS Paloosi Banda	GPS No.1 S/Dara	VSNo.11
11	Akhtar Zaman PST	GPS No.1 S/Dara	GPS Paloosi Banda	VSNo.10
12	Sadiq ur Rehman PST	GPS Muslim Abad No.1	GPS No.2 Chorlaki	VSNo.15
13	Surat Shah PST	GPS No.2 Chorlaki	GPS No.1 Muslim Abad	VSNo.12

(ZAHID FASHID)
DISTRICT EDUCATION OFFICER
(MALE) KOHAT

Endst.No. 7/01-4 dated 3 1 10 2013

Copy to the-

1. District Accounts Officer Kohat
2. SDEO (M), Kohat & Lachi *with the proposal of both SDEOs*
3. SDEO Circle Concerned
4. Head Teacher concerned

[Signature]
BY DISTRICT EDUCATION OFFICER
(MALE) KOHAT

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KOHATTRANSFER

Consequent upon the approval of the Competent Authority, as per proposed by SDEO(M) Lachi the following PST are hereby transferred on their own pay and grade in the interest of public service, their name & school name noted against each

No TA/DA is allowed

Charge report should be submitted to all concerned

S.N	Name & Designation	From	To	Remarks
1.	Shafiq ur Rehman PST	GPS Bori Saghri	GGPS Bori Saghri	VSNo.2
2.	Muhammad Afzal PST	GPS No.1 Sur Gul	GGP SNo.1 Sur Gul	VSNo.1
3.	Nadir Perveez PST	GPS Bori Saghri	GGPS No.2 Chorlaki No.2	VSNo.4
4.	Akhtar Zaman PST	GPS No.2 Chorlaki	GS Dh. Khajab Gul	VSNo.3
5.	Jalil Ur Rehman PST	GPS Salim Abad	GGPS Spinki Killa	VSNo.6
6.	Shahid Anwar PST	GPS Spinki Killa	GPS Salim Abad	VSNo.5
7.	Muhammad Tariq PST	GPS Sudal	GPS Kiroosara	Need Basis
8.	Yousaf Khan PST	GPS Shawaki	GPS No.3 S/Dara	VSNo.9
9.	Akhtar Hussain PST	GPS No.3 S/Dara	GPS Shawaki	VSNo.8
10.	Zahoor ur Rehman PST	GPS Paloosi Banda	GPS No.1 S/Dara	VSNo.11
11.	Akhtar Zaman PST	GPS No.1 S/Dara	GPS Palsoosi Banda	VSNo.10
12.	Sadiq ur Zehman PST	GPS Muslim Abad No.1	GPS No.2 Chorlaki	VSNo.13
13.	Surat Shah PST	GPS No.1 Muslim Abad	GPS No.1 Muslim Abad	VSNo.12

Sd/-
Zahid Rashid
District Education Officer
(Male) Kohat

Endst NBo.7101-4

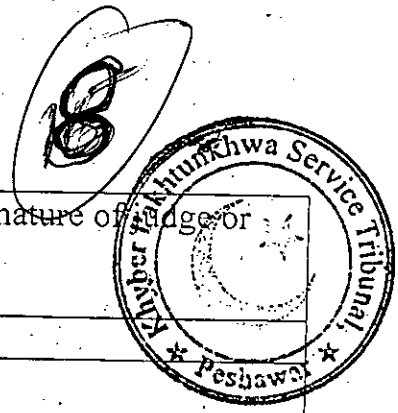
dated 3/10/2013

Copy to the:

1. District Accounts Officer Kohat.
2. SDEO (M) Kohat & Lachi with the proposal of both SDEOs
3. ASDEO Circle Concerned.
4. Head Teacher concerned

Sd/-
District Education Officer
(Male) Kohat

[Handwritten Signature]



S.No.	Date of order/ proceedings	Order or other proceedings with signature of Judge or Magistrate
-------	----------------------------	--

1

2

3

09.02.2014

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

Service Appeal No. 103/2014,
Muhammad Afzal Versus Govt of KPK, through
Secretary, Elementary & Secondary Education,
Peshawar etc.

PIR BAKHSH SHAH, MEMBER.- Appellant
with counsel, and Mr. Muhammad Jan, GP with Afzal
Khan, SDEO for the official respondents present.

2. The appellant was serving as PST at GPS Bori Baghri, Shakardara Kohat and was transferred therefrom to GPS No. 1 Sur Gul Shakardara vide impugned order dated 3.10.2013. His departmental appeal dated 09.10.2013 was not responded by the competent authority, hence this appeal.

3. Written reply of the respondent department is also available on file.

4. Arguments heard and record perused.

5. It was submitted by the learned counsel for the appellant that the appellant is PST and he has been transferred far away from his residence/Union Council in violation of Section 3 of the Khyber Pakhtunkhwa (Appointment, Deputation, Promotion, Posting and Transfer of Teachers, Lecturers, Instructors and Doctors) Regulatory Act, 2011. It was further submitted that the impugned order being politically motivated as evident from the impugned order and not justifiable, is

ATTESTED
EX-AMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

9

liable to be set aside.

6. Perusal of the entire record would show that no rationalization for the impugned order has been worked out by the respondent-department. Section 3 sub-section (4) of the above law lays down that on passing of one year of the law, all Primary School Teachers should be appointed in their respective Union Councils. There is nothing on record to show as to why this law was not taken into account by the respondent-department at the time of the impugned order. Conspicuously being in conflict with the above law, the Tribunal has no option but to set aside the impugned order. We are also mindful of the precious time of the students, therefore, without out rightly cancellation of the impugned order, we would like to direct the respondent-department to consider transfer of the appellant from the school in his Union Council strictly in accordance with Section 3 of the said law, within a period of one month failing which the impugned order shall automatically stand cancelled. Parties are left to bear their own costs. File be consigned to the record.

7. This order will also dispose of another connected appeal No. 104/2014, Muhammad Khursheed Versus Government of KPK through Secretary Elementary & Secondary Education, Kohat having common question of law and facts, in the same manner.

ANNOUNCED
9.2.2015

Adf. P. S. Bakhshi Shadi
Member
Adf. Abdul Latif
Member

Certified to be true copy

EXC. CLERK
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

Date: 10-3-2015
10-3-2015
10-3-2015
10-3-2015
10-3-2015
10-3-2015

(10)

10

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KOHAT

CANCELLATION

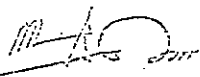
Consequent upon the judgment of honorable Service Tribunal Peshawar under passed appeal No. 103/14, Muhammad Afzal and appeal No. 104/2014 Khursheed vs DEO (Male) and others. The following order in respect of Muhammad Afzal PST GPS, Bori Saghri to GPS No.1 Surgut and Muhammad Khursheed PST GPS Karori Kalay to GPS Banda Fateh Khan vide this Office Order No. 7101-4 dated 03.10.2013 at S.No. 2 and No. 7105-8 dated 03.10.2013 at S.No.2 are hereby cancelled with immediate effect.

- Sd -

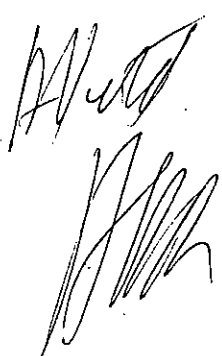
(ROZ WALI KHAN)
DISTRICT EDUCATION OFFICER
(MALE) KOHAT

Endst. No. 1173-76 dated 05/03 /2015
Copy to the:-

1. Registrar Service Tribunal Khyber Pakhtunkhwa Peshawar.
2. District Accounts Officer Kohat
3. SDEO (M) Kohat & Lachi.
4. Officials Concerned.


DY DISTRICT EDUCATION OFFICER
(MALE) KOHAT

05/3/2015



محترم وگرامی قدر ڈسٹرکٹ ایجوکیشن آفیسر سکولز (مردان) ضلع کوہاٹ

نمونہ اپیل برائے منسوخی تبادلہ آرڈر

14

* موربانہ گزارش ہے کہ میں شاہد نور بی ایس ٹی بنیادی سکول 12 گورنمنٹ پرائمری سکول سینکلی کلیمین کونسل شکر پورہ رورل I تحصیل لاچی میں گذشتہ 2 1/2 سال سے پڑھا رہا ہوں۔ سکول ہذا میں طلباء کی کل تعداد 267 ہے اور تعداد کے مطابق سات (7) اساتذہ کا مکمل سٹاف موجود ہے جن میں BS-15 کا ایک استاد، BS-14 کے دو اساتذہ اور BS-12 کے چار اساتذہ ہیں جو کہ نئی وضع کردہ پالیسی آفٹریٹینٹلائزیشن کے عین مطابق ہیں۔ (نقشہ)

* ایک استاد جنیل الرحمن BS-14 کا تبادلہ میری جگہ کیا گیا ہے اور مجھے ایک دور دراز سکول سلیم آباد واقع یونین کونسل سماری تحصیل کوہاٹ تبدیل کیا گیا ہے۔ اس طرح سے BS-12 کے چار اساتذہ کم ہو کر تین رہ گئے ہیں اور BS-14 کے دو اساتذہ کی تعداد تین ہو گئی ہے جو پالیسی کے مطابق نہیں۔

* کچھ عرصہ قبل میرے والد صاحب کی وفات اور ایک بچے کے پیدائشی طور پر معذور ہونے کے باعث میں سنگین مالی مشکلات کا شکار ہو گیا ہوں کیونکہ میں گھر کا واحد کفیل ہوں۔

لہذا موربانہ استدعا ہے میری تبدیلی کے آرڈر نمبر 4-7104 مورخہ 13-10-3

سیریلی نمبر 6 کو منسوخ کیا جائے۔ شکریہ

دفعہ 7 پر آرڈر جس وقت ہو رہا تھا اس وقت ڈائریکٹر ایجوکیشن لاچی

مورخہ 2013-10-07

ایچکا قایم فرمان

Amir

Received on 27/11/2013
Nirmal K S
نصرت

شاہد نور PST
7/10/2013
GPS سینکلی کلیمین کونسل رورل لاچی
تحصیل لاچی ضلع کوہاٹ

حال = GPS سلیم آباد
یونین کونسل سماری
تحصیل کوہاٹ

DEOM
Kohat

please accommodate
and ensure the policy
of the provincial govt.

26/12/2013
Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Imtiaz Shafiq Qureshi Advocate
Deputy Speaker
Provincial Assembly Khyber Pakhtunkhwa

[Handwritten signature]

کے آرڈر میں منسوخ کر دیے ان کا آئی آرڈر نمبر 1355 ہے

Better Copy of Page - 14

محترم گرامی فرد دستگیر اور کونسل آف ایجوکیشن سکولز (مردانہ) تحصیل کوٹاہ
عنوان :- اپیل برائے سہولتی بنیاد آرڈر

مورد بائہ گزارش ہے کہ میں شاہ ۲ اوری ایس ٹی بنیادی سکول ۱۲ گورنمنٹ ہائر ایڈمی سکول سیکٹی
کلمہ روٹن کونسل شکر درہ روزل آ تحصیل (رجی میں گزشتہ 2 1/2 سال سے پڑھا رہا ہوں
سکول فنڈ میں طلبہ کی کل تعداد 267 ہے اور تعداد کے مطابق سات (7) اساتذہ کاکمل مشاف
موجود ہے۔ جن میں 15 B.S کا ایک اساتذہ، 14 B.S کے دو اساتذہ اور 12 B.S کے چار اساتذہ ہیں جو
کہ نئی وضع کردہ پالیسی آفٹر ریٹنڈیشن کے عین مطابق ہیں (نئے)
یہ ایک اساتذہ جلیل الرحمن B.S کا بنیاد مہری جگہ لیا گیا ہے اور مجھے ایک دو روز اسکول
سلم آباد واقع روٹن کونسل سمارٹ تحصیل کوٹاہ تبدیل لیا گیا ہے۔ اس کے ساتھ B.S
کے چار اساتذہ کم عمر میں آ رہے ہیں اور 14 B.S کے دو اساتذہ کی تعداد میں کمی ہے جو جاری

کے مطابق ہے۔

کہ جو کہ قبل سے وہاں صاحب کی وفات اور دیگر جگہ کی سہولتی کے طور پر منظور ہیں کہ باعث اس
مستحق مال شکر درہ کا بنیاد مہری لیا گیا ہے۔ کیونکہ میں گورنمنٹ کا دلہہ کھول رہا ہوں۔

لہذا سہولت بائہ اس سہولتی کے آرڈر نمبر 4-710 جو نمبر 13-10-2 سے لگا رہا
کو منسوخ کیا جائے۔ شکر ہے۔

واقعہ یہ ہے کہ آرڈر جس وضع ہو رہا تھا اس وضع پر منظور BSN لگا کر آرڈر منسوخ کیا

آدیکانامہ ارسال

سناحد فور
2013/11/7

MS سیکریٹری کل روٹن کونسل روزل شکر درہ

تحصیل (رجی) ضلع کوٹاہ

مال۔ MS کل روٹن کونسل سمارٹ تحصیل کوٹاہ

No: 57

Date: 18.03.2015

To

The District Education Officer (Male)
Kohat

Through: Proper Channel

Subject: Appeal for the cancellation of impugned transfer order No. 710/14
dated 03-10-2013.

Sir,

Respectfully it is submitted that I was transferred from GPS Spin Kai Kala Union Council Shakardara Rural-I Tehsil Lachi to GPS Salim Abad Union Council Sumari Payan Tehsil & District Kohat vide S No.6 of the above mentioned impugned order. (copy enclosed)

DEOM
Kohat
Please provide
justice and facilitate
No employee may be
politically victimized.
18/3/15
Director
Elementary &
Secondary Education
KPK Pesh.

2. I belong to Union Council Shakardara Urban Tehsil Lachi but instead I was transferred to far flung area located in another Tehsil of District Kohat purely on political grounds. This was clear violation of KPK (Appointment, Deputation, promotion, posting and transfer of Teacher, Lecturers, Instructor and Doctors). Regulatory Act 2011 which clearly indicates that all PST should be posted in their respective Union Councils.

3. I represented against my transfer on 07-10-2013 and also several reminders were sent to the competent authority. The Director Elementary & Secondary Education KPK Peshawar also instructed the DEO (Male) Kohat to accommodate me & ensure the policy of the provincial Govt. (copy enclosed). Up till now there is no response. All the record of my appeals/reminders etc is available in the Department.

4. It is pertinent to mention that at the time of my transfer order dated 03-10-2013 there was Ban on all kind of posing/transfers vide notification No. 1900-2002 / F.No 69/ Vol-II/P/Transfer G. Branch Dated 19-06-2013 which was also violated as there were no extraordinary circumstances for my transfer.

5. On the other hand two of the PST at S No. 9 and 13 in the same transfer order dated 03-10-2013 were transfer back to their nearest home stations due to personal liking & disliking which also indicate, that the said order was not issued in the interest of the public service/policy of the Govt.

6. My wife who is PST in Govt Girls Primary School (GGPS) No. 3 located in Union Council Shakardara Urban submitted an appeal to DEO (M) Kohat for my transfer to nearest

No: 57

Date: 16.03-2015

To

18

The District Education Officer (Male)
Kohat

Through: Proper Channel

Subject: Appeal for the cancellation of impugned transfer order No. 7101-4
dated 03-10-2013.

Sir,

Respectfully it is submitted that I was transferred from GPS Spin Kai Kala Union Council Shakardara Rural-I Tehsil Lachi to GPS Salim Abad Union Council Sumari Payan Tehsil & District Kohat vide S No.6 of the above mentioned impugned order. (copy enclosed)

2. I belong to Union Council Shakardara Urban Tehsil Lachi but instead I was transferred to far flung area located in another Tehsil of District Kohat purely on political grounds. This was clear violation of KPK (Appointment, Deputation, promotion, posting and transfer of Teacher, Lecturers, Instructor and Doctors). Regulatory Act 2011 which clearly indicates that all PST should be posted in their respective Union Councils. — P3

3. I represented against my transfer on 07-10-2013 and also several reminders were sent to the competent authority. The Director Elementary & Secondary Education KPK Peshawar also instructed the DEO (Male) Kohat to accommodate me & ensure the policy of the provincial Govt. (copy enclosed). Up till now there is no response. All the record of my appeals/reminders etc is available in the Department. (P-5-10)

4. It is pertinent to mention that at the time of my transfer order dated 03-10-2013 there was Ban on all kind of posing/transfers vide notification No. 1900-2002 / F.No 69/ Vol-II/P/Transfer G. Branch Dated 19-06-2013 which was also violated as there were no extraordinary circumstances for my transfer. (P10-A)

5. On the other hand two of the PST at S No. 9 and 13 in the same transfer order dated 03-10-2013 were transfer back to their nearest home stations due to personal liking & disliking which also indicate, that the said order was not issued in the interest of the public service/policy of the Govt. — P-11, 12, 13

6. My wife who is PST in Govt Girls Primary School (GGPS) No. 3 located in Union Council Shakardara Urban submitted an appeal to DEO (M) Kohat for my transfer to nearest — P14

P13

14

school vide Para-I (sub Para-V) of the policy of posting of serving husband/wife in the same stations as my son is physically disable & needs proper care/treatment. Sub Para-V of the policy reproduced as under "Request for posing by a spouse facing serious medical problem may be accorded highest priority" this request was also not entertained which is clear injustice. In the mean time some of the teachers were also transferred/adjusted in the nearest home stations vide SDEO (Male) Lachi Endst No. 99-123 dated 21-08-2014. Legally I should have been given highest priority as per the above mentioned policy.

P111-23

7. Mr. Jalil ur Rehman PST at S. No ⁵ 6 of the transfer order dated 03-10-2013 who was transferred in my place in GPS Spain Kai Kala was promoted as CT teacher BPS-15 and the post was lying vacant where I could have been easily adjusted against this post. Knowingly that the impugned transfer order dated 03-10-2013 has been cancelled by the KPK Services Tribunal Peshawar on 09-02-2015, the Department appointed some PST against the same post in Spain Kai Kala. These also show mala fide intention. *An attempt of blocking my way.*

8. Muhammad Afzal PST at S.No 2 of the above mentioned order dated 03-10-2013 approached the KPK Services Tribunal Peshawar vide appeal No. 103/2014 for cancellation of the transfer order No. 7101-4 dated 3-10-2013.

9. The Honorable court decided that the Department has violated KPK (Appointment, Deputation, Promotion, Posting and transfer of Teachers, Instructor, and Doctors) regulatory Act 2011. Therefore issued orders for the cancellation of the transfer order. (Copy of the court judgment is enclosed) — P-25-26-

10. The transfer order of Muhammad Khursheed was also cancelled having common question of law and facts vide Para-7 of the court judgment. P-26 + P27

11. I was also transferred by the same impugned order dated 03-10-2013 at S. No 6 having same common question of law & facts, therefore it will be considered in the same manner. This is also evident from the Para 7 of the judgment of the Peshawar High Court dated 03-07-2012 (copy enclosed) on the basis of reported judgment 1996 SCMR-1185 the relevant portion where of is reproduced herein below for ready reference. P-30

"We may observe that if the Tribunal or this Court decides a point of law relating to the terms of service of a civil servant which covers not only the case of the civil servant who litigated, but also of other civil servants, who may have ~~any~~ ^{not taken} any legal proceedings, in such a case, the dictates of justice and rule of good governance demand that the benefit of the above judgment be extended to other civil servants, who may not be parties to the above litigation instead of compelling them to approach the Tribunal or any other legal forums.

- PST
15

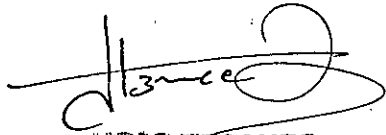
Unequivocally laid down that:-

Once a judicial determination, be it of a point of fact or of a point of laws, has been made and if such a determination covers not only the one litigating before the courts but some others also, then the benefits accruing from such a determination should not be restricted only to the litigation parties but should be extended even to those who had not indulged in litigation unless there were some extraordinary un-exceptionable reasons to the contrary and that all power, including the powers inherent in the courts be invoked for the purpose. Such would not only ensure justice for all but would also have the effect of eliminating un-necessary litigation."

Keeping in view that the above mentioned facts it is hoped that the present administration will consider my case sympathetically to avoid me from further financial, physical, and mental torture and un-necessary litigation. It is therefore, requested that my transfer order may be cancelled in the light of all the Honourable Courts judgments.

Thanks

forwarded to SDEO (Male)
His case is genuine & may be considered
on priority basis.

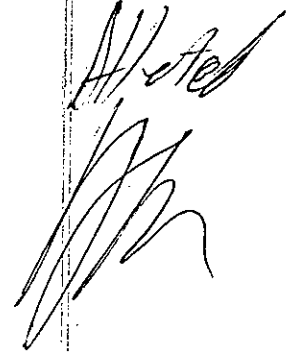


HEAD TEACHER
G.P.S. Salimabad
Kohat

Received copy of DEO

17/3/15
PA DEO

Obediently Yours



MR. SHAHID ANWAR

PST GPS Salim Abad

Sumari Payn Tehsil & District Kohat.

No. 58-60

Date 16-03-2015

Copy of the above is forward for information and necessary action to:

1. The Director Elementary & Secondary Education KPK Peshawar
2. The District Education Officer (Male) Kohat.
3. The SDEO (Male) Lachi District, Kohat.

g/c

Mr. Shahid Anwar
PST

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (MALE) PRIMARY CIRCLE LACHTI (KOHAT).

16

NO. 1291 /

Dated 28 / 8 / 2013.

To
The District Education Officer,
(Male) Kohat.

Subject: TRANSFER/PROPOSAL

It is stated for your kind information that honourable Dy:Speaker Mr. Imtiaz Qureshi have sent transfer proposal of PST teachers BPS. 12, BPS. 14 & 15 working under the control of this office for further adjustment in the schools noted against each individual. As your good aware of the fact that proposal for adjustment in BPS. 12, BPS. 14 & 15 have already been sent to your office for further necessary action.

The present list conveyed by above name dignitary has also been submitted for consideration as he is pressing very hard for issuing adjustment order while the indulgence of such order does not fall under the competency of this Sub Division with out your good consent. The original proposal list of transfer recommended by Honourable Dy:Speaker KFK are enclosed herewith for further n/a please.

Sd/
SUB DIVISIONAL EDU:OFFICER
(MALE) PRIMARY LACHTI (KOHAT).

Encls: NO. 1292 /

11 Copy forwarded to the Dy:Speaker KFK for further information please. 11

Sd/
SME DIVISIONAL EDU:OFFICER
(MALE) PRIMARY LACHTI (KOHAT).
au

[Handwritten signatures]

17

The following PST teachers BPS-14 are hereby proposed for adjustment on dire need basis on the recommendation of Hon: Halq MPA are put up for further perusal and order please

S#	Name & Designation	From	To	Remarks
✓ 1	Muhammad Shafiq PST	GPS No.1 Sur Gul	GPS Bori Saghri	VSNo.2
✓ 2	Muhammad Afzal PST	GPS Bori Saghri	GPS No.1 Sur Gul	VSNo.1
✓ 3	Nadir Perveez, PST	GPS Dh:Khajab Gul	GPS No.2 Chorlaki No.2	VSNo.4
✓ 4	Akhtar Zaman PST	GPS No.2 Chorlaki	GS Dh:Khajab Gul	VSNo.3
✓ 5	Jalil Ur Rehman PST	GPS Salim Abad	GPS Spinki Killa	VSNo.6
✓ 6	Shahid Anwar PST	GPS Spinki Killa	GPS Salim Abad	VSNo.5
✓ 7	Muhammad Tariq, PST	GPS Sudai	GPS Kiro sam	Need Basis
✓ 8	Yousaf Khan, PST	GPS Shawaki	GPS No.3 S/Dara	VSNo.9
✓ 9	Akhtar Hussain, PST	GPS No.3 S/Dara	GPS Shawaki	VSNo.8
10	Anwar Kamal, PST	GPS Inzerwala	GPS Lachi Bala	Need Basis
11	M. Qasir PST	GPS Banda Fetha Khan	GPS lachi Payan	Need Basis


DIASSA

SDEO(M) Lachi





10-A

copy on ...
received.
18
A. B. ...
25/10/13

**OFFICE OF THE DIRECTOR ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA, PESHAWAR**

NOTIFICATION.

The competent authority has been pleased to impose ban on all kind of posting/transfers in Elementary & Secondary Education Khyber Pakhtunkhwa with immediate effect till further order

Director
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

1900-2002

Endst:No. _____ /F.No 69/Vol-II/P/Transfer G.Branch Dated 19/6 /2013

Copy forwarded to the:-

- 1-50 All the District Education Officers (M/F) in Khyber Pakhtunkhwa
- 51-100 All the SDEO (M/F) in Khyber Pakhtunkhwa,
- 101 PS to Minister Education (E&SE) Khyber Pakhtunkhwa
- 102 PS to Secretary to Govt: of (E&SE) Department Khyber Pakhtunkhwa
- 103 PA to Director E&SE Peshawar

[Signature]
Deputy Director Establishment
(E&SE) Khyber Pakhtunkhwa, Pesh
19/6/2013

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) HANGU.
dated 27/6 /2013.

No 2642-44

- copy to the:-
- 1- All the principal/Head Master, GISS/GIS/GIS in Hangu.
 - 2- Sub Divisional Education officer (M) Primary Hangu.
 - 3- All the A.D.E.Os Local office
 - 4- Office Copy.

[Signature]
DISTRICT EDUCATION OFFICER
(MALE) DISTRICT HANGU.

[Handwritten signatures]



**OFFICE OF THE DISTRICT EDUCATION
OFFICER (FEMALE), KOHAT**

No. 1320
Dated Kohat the 19/7/2014
Phone & Fax # (0922-9260290)
(KDA complex, Block III, Gate No 2)

19

To
The District Education Officer
(Male) Kohat

Subject: **TRANSFER UNDER POLICY REGARDING POSTING
OF HUSBAND/ WIFE IN THE SAME STATION**

Memo:
Enclosed please find here with an application received from Mst. Nasrat
Bibi PST GGPS No. 3 Shakardara on the subject cited as above.

It is requested that her request for transfer of her husband Mr. Shahid
Anwar Sr. PST GPS Saleem Abad Summari Payan is may be considered on humanitarian
ground as indicated.

- Enclosure: 1. Application
2. Disability Certificate
3. Policy of posting
4. Has husband & wife

N. Jaffer
DISTRICT EDUCATION OFFICER
(FEMALE), KOHAT

Shahid
AK

بمقام جناب ڈسٹرکٹ ایجوکیشن آفیسر صاحب (مردانہ) ضلع کوہاٹ
بوساطت :- سب ڈویژنل ایجوکیشن آفیسر صاحب (مردانہ) تحصیل لاجی

عنوان :- تبادلہ بمطابق پالیسی آف پوسٹنگ آف سرورنگ / انسٹانڈ ان دی سروس

ٹیکسٹ (ESTA CODE KPK PAG 103)

مؤدبانہ گزارش ہے کہ میں نصرت بی بی گورنمنٹ گرلز پرائمری سکول نمبر 3 شکردڑہ (کوہاٹ) میں بحیثیت پرائمری ٹیچر خدمات انجام دے رہی ہوں۔ میرا ایک بچہ محمد آفاق شاہد عمر تقریباً 2 سال دونوں ٹانگوں سے معذور ہے۔ جس کے علاج اور دیکھ بھال میں مجھے کافی مشکلات درپیش ہیں۔

میرے شوہر شاہد انور بھی پرائمری سکول ٹیچر ہیں۔ کچھ عرصہ قبل اسکا تبادلہ GPS سینکڑی کلا یونین کونسل رورل نمبر 1 شکردڑہ تحصیل لاجی سے GPS سلیم آباد یونین کونسل ساری پایان تحصیل کوہاٹ کو کیا گیا۔ جس کی منسوخی کے لیے میرے شوہر نے آپ صاحبان کی خدمت میں اپیل بھی کی ہے۔ جو آپ کے دفتر میں زیر غور بھی ہے۔

لہذا گزارش ہے کہ حکومت خیبر پختونخواہ کی تجویزہ پالیسیوں خصوصاً عنوان بالا میں مذکورہ پالیسی کے پیرا گراف نمبر 1 (سب پیرا نمبر 7) کے مطابق میرے شوہر کو کسی قریب ترین سکول واقع یونین کونسل اربن شکردڑہ یا رورل نمبر 1 شکردڑہ میں تبدیل کرنا کر مشکور فرمائیں تاکہ میرے بچے کا صحیح علاج اور دیکھ بھال ہو سکے۔ توقع ہے کہ آپ صاحبان میری درخواست پر انسانی ہمدردی کے تحت غور فرمائیں گے۔

نہایت شکریہ و مہربانی کے ساتھ

نقلمورخہ 2014 2061

ہجرت

Received
in DEO (Male)
on 13/6/2014

نصرت بی بی معلمہ گورنمنٹ گرلز پرائمری سکول نمبر 3 شکردڑہ تحصیل لاجی ضلع کوہاٹ

دستخط:- Nazrat Bibi

شناختی کارڈ نمبر:- 14301-9843579-2

Forwarded to S.D.E. (C.M)
Lachi

Principal
Head Mistress
G.G.P.S. No-3
Shakardara

نقل برائے اطلاع و ضروری کارروائی

خدمت ڈسٹرکٹ ایجوکیشن آفیسر (مردانہ) ضلع کوہاٹ

The District Education Officer,
(Female) Kohat.

1492
16-7-14

Through :- proper channel

Subject:- Transfer under policy regarding
posting of Husband/wife in
The same station

Dear Madam

Kindly enclosed find herewith
my application regarding transfer of
my husband Mr Shahid Anwar PBT
BPS 14. The application is self
explanatory & needs sympathetic
consideration.

It is requested that my application
may be forwarded to D.E.O (Male) Kohat
for issuing of Transfer orders of
Mr Shahid Anwar. BPS-14

Dated 14-07-2014.

Obediently yours

Aayat Bibi

NUstrat Bibi

DET chakardar

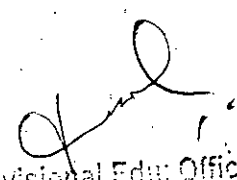
End: Two

To
Ms Hamidull
put up in paper
File Kohat
DEO (F) 15/7

No _____

Date _____

Submitted to DEO(F) Kohat for onward submission
to Quarta Council for favour for the Nichee Plees.


Sub: Divisional Edu: Officer
(Female) Lachi (Kohat)

20

18

22

DISTRICT GOVERNMENT
DISTRICT OFFICE of SOCIAL WELFARE & WOMEN DEVELOPMENT
DEPARTMENT KOHAT
DISTRICT COUNCIL FOR REHABILITATION OF DISABLED PERSONS
(DCRDP)

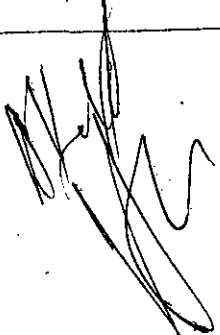


Dated 30.06.2014

Reg: No 03100/DAB/SW

Disability Certificate
District Assessment Board For Disabled Persons
DABDP

Name: Mohammad Afag Shahid Father's Name: Shahid Anwar
 Married / Un-Married: Un-Married Spouse: Nil
 Date Of Birth: 14.02.2012 N.I.C #: Form B-14301-4622357-9
 Qualification: Nil Nature of Disability: Physically
 Present Address: Mohallah Malakhel, Village & P.O Shakardara, District Kohat
 Permanent Address: As Above
 Recommendation of the Board: Disability Certificate


 District Officer / Secretary (DABDP)
 Social Welfare & WDD
 Kohat.
 Phone & Fax: 0922-9260306
 Date: 30/06/14

Block # 3, Govt. Offices Complex KDA Gate #2 Kohat.

9

23

ESTA CODE [Establishment Code Khyber Pakhtunkhwa]

103

(iii) The process should be completely transparent and in the best public interest.

I am further, directed to request that all concerned should ensure that:-
(a) All postings/transfers are made strictly in accordance with this posting/transfer policy and any-one violating the said policy shall be held accountable under the E&D Rules.

(b) If an exemption is required to be made in exigency of service aiming at serving public interest, that shall be allowed only by the Chief Secretary.

(c) Each department, without violating the posting/transfer policy, may add further yardsticks, keeping in view their own requirement, which shall be got approved, from the Chief Secretary.

3. The receipt of this letter may kindly be acknowledged..

(Authority S&GAD letter No.SOR-I(S&GAD)1-1/35(Vol.I), dated 22.12.99)

Policy of posting of serving Husband/Wife in the same station.

Sl.No.9

The following policy of the Federal Government with regard to the posting of husband and wife at one station of duty, has been adopted by the Provincial Government of NWFP in respect of its employees working in Government Departments, Autonomous and Semi-Autonomous Bodies in the NWFP:-

(i) Where a request is made for posting at a different station in the same department/service/cadre in which an employee is already serving, the request may be accepted subject to availability of a post in the same BPS.

(ii) If a request involves temporary deputation to another department, it may be processed in consultation with the concerned department, and may be accepted on the prescribed terms of deputation subject to availability of a post in the same BPS.

(iii) When a request is made for permanent transfer to/absorption in another department/agency, the request may be processed in consultation with the department concerned, subject to the condition that in the event of permanent transfer, seniority shall be determined in accordance with Section-8 of the NWFP Civil Servants Act, 1973 read with Rule-17 of the NWFP Civil Servants (Appointment, Promotion and Transfer) Rules, 1989.

(iv) If there is a tie between two or more Government servants for posting at the same station in the same department/unit of an organization, the Government servant with greater length of service may be preferred.

P.T.O

(v) Request for posting by a spouse facing serious medical problems may be accorded highest priority.

(vi) Husband already posted at one station, including those posted on deputation beyond the prescribed maximum period, may normally not be disturbed without compelling reasons of public interest. Requests for extension of deputation period beyond the permissible limit may be considered with compassion if interests of public service would permit.

2. The above guidelines are subject to the following conditions:-

(i) Posting of husband and wife at the same station should not be made by dislocation of any Government servant already serving at a particular station unless his transfer is necessitated by compelling reasons of public interest or within the frame work of general policy of postings and transfer.

(ii) The prescribed selection authority should be consulted in each case.

3. It is requested to follow the above policy strictly in letter and spirit.

(Authority:- Circular letter No.SORI(S&GAD)1-1/85(V.I), dt: 11.7.98)

Decision of the Provincial Cabinet meeting held on 8.7.99

S.No. 10

Decision

"DEOs & SDEOs (female) may be posted in their own district of domicile by the Education Department if considered necessary & unavoidable"

(Authority:-Circular letter No.SOC(S&GAD)27/89/99, dated 15.07.99)

Placement Scrutiny Committee

S.No.11

Notification:

No.SOI(S&GAD)1-1/98. The competent authority is pleased to constitute a Placement Scrutiny Committee comprising of the following:-

- | | | |
|----|--------------------------------|------------------|
| a. | Additional Chief Secretary | Co-ordinator |
| b. | Senior Member Board of Revenue | Member |
| c. | Secretary Home & TA Department | Member |
| d. | Secretary S&GAD | Member/Secretary |

2. Functions of the Committee are as under:-



(22) (25)
OFFICE OF THE DISTRICT EDUCATION
OFFICER (FEMALE), KOHAT

No _____
Dated Kohat the _____ / _____ / 2014
Phone & Fax # (0922-9260290)
(KDA complex, Block III, Gate No 2)

To
The District Education Officer
(Male) Kohat

Subject: **APPLICATION FOR TRANSFER**

Memo: Please find enclosed herewith an application alongwith its enclosure in respect of Mst. Nusrat Bibi PST GGPS Shakardara No 1 regarding the transfer of her husband for favour of necessary action

Sd/-
DISTRICT EDUCATION OFFICER
(FEMALE), KOHAT

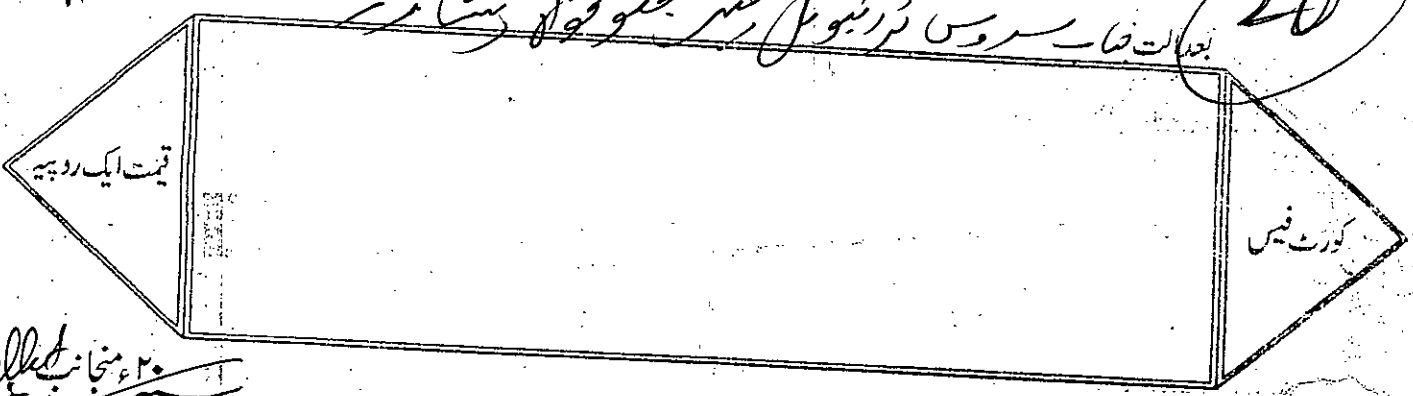
Endst. NO 4469 / _____ Dated Kohat the 11/12/2014

Copy of the above is forwarded to the:

1: Mst. Nusrat Bibi PST GGPS Shakardara No 1 Kohat

[Signature]
DISTRICT EDUCATION OFFICER
(FEMALE), KOHAT

[Signature]



۲۰ منجانب اپیل Appellate

مقدمہ شاہد انور مقدمہ بنام گورنمنٹ آف حصر مٹھنوں کو لا سٹا در

سروس اپیل فرم 2018

باعث تحریر آنکھ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جوابدہی کل کارروائی متعلقہ آں مقام کے لئے

حسن۔ یو۔ 2۔ آفیسری کی ایڈووکیٹس میں اور بجائی کورٹ میں در

مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا اختیار ہوگا۔ نیز وکیل صاحب کو کرنے راضی نامہ و تقرر ثالث و فیصلہ بر حلف دینے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرانے اجراء اور وصولی چیک در روپیہ اور عرضی دعویٰ اور درخواست ہر قسم کی تصدیق زر اس پر دستخط کرنے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی ایجنڈ منسوخی و نیز دائر کرنے اپیل نگرانی نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ اور بصورت ضرورت مقدمہ مذکور کے کل یا اپنی بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے۔ اور اس کا ساختہ پر داختم منظور و قبول ہوگا۔ دوران مقدمہ میں جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب سے ہوگا۔ اس کے مستحق کیا صاحب موصوف ہوں گے نیز بقایا خرچہ کی وصولی کرنے کا بھی اختیار ہوگا۔ اور کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر وکیل صاحب پابند نہ ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

۲۰

Sh. Anwar

شاہد انور بی ایس بی

المرقوم

Accepted

کے لئے منظور ہے۔

مقام

BEFORE THE HON'ABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR.

Appeal No 738/2015

Shahid Anwar S/O Aman Ullah PST at GPS Saleem Abad, Sumari Payan Tehsil & District Kohat.

.....Appellant

VERSUS

1. Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education.
2. Director Elementary & Secondary Education Peshawar.
3. District Education Officer (Male) Kohat.
4. Sub Divisional Education Officer (M) Lachi.
5. Respondants..

I N D E X

S.No.	Description of Documents	Annex	Pages
1	Affidavit		1
2	Para wise comments.		2-4
3	Appellant Promotion Order to BPS-14 and Charge Report/Certificate		5-6
4	Transfer Order to GPS Spinkai Kala, Charge Report and Relieving Slip from GPS Spinkai Kala to GPS Salim Abad		7,8,9
5	Appellant appeal to DEO (M) Kohat with recommendation of Local MPA, the then Deputy Speaker Provincial Assembly Khyber Pakhtunkhwa		10

M. J. J.
Sub.Divisional Education Officer
(Male) Primary Lachi Kohat

BEFORE THE HON'ABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR.

Appeal No 738/2015

Shahid Anwar S/O Aman Ullah PST at GPS Saleem Abad, Sumari Payan Tehsil & District Kohat.

.....Appellant

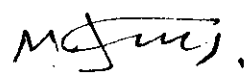
VERSUS

- 1. Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education.
- 2. Director Elementary & Secondary Education Peshawar.
- 3. District Education Officer (Male) Kohat.
- 4. Sub Divisional Education Officer (M) Lachi.

..... Respondents.

AFFIDAVIT

I Muhammad Ilyas Khan SDEO (M) Primary Tehsil Lachi (Kohat) do hereby solemnly affirm and declare on oath that the contents of the accompanying Para Wise Comments on behalf of respondent No.1 to 4 are true and correct to the best of my knowledge and belief and that nothing has been concealed from this honorable Tribunal.



DEPONENT

CNIC No. 14202-1324299-7

BEFORE THE HON'ABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR.

Appeal No 738- 2015

**Shahid Anwar S/O Aman Ullah PST at GPS Saleem Abad, Sumari Payan Tehsil & District Kohat.
.....Appellant**

VERSUS

- 1. Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education.**
- 2. Director Elementary & Secondary Education Peshawar.**
- 3. District Education Officer (Male) Kohat.**
- 4. Sub Divisional Education Officer (M) Lachi.**

..... Respondants.

REPLY ON BEHALF OF RESPONDENTS 1-4.

It is solicited that the impugned order dated 3/10/2013 has been issued in the best interest of the public & is not maintainable in present form as the appellant has been promoted to BPS 14 through order no 675-79 dated 11/6/2014 & has taken charge as well (copy annexed at page 5&6). More over the appellant has completed three (3) years tenure in GPS Spinki Killa (Transfer order No 355-58 dated 5/10/10 to GPS Spinki Killa ,Charge report & reliving slip from GPS Spinki Killa to GPS Salim Abad through impugned order no 7101-4 dated 3/10/2013 are annexed at page 7,8 ,9 respectively. Further the appeal is time bar .So the appeal may kindly be set aside.

PRELIMINARY OBJECTIONS:

- 1. That the appellant has got no cause of action/locus standi to file the present appeal as he has been promoted from BPS 12 to SPST BPS 14 through order no 675-79 dated 11/6/2014 & has taken charge as well (copy annexed already). & thus the present appeal is in fractious. Further the appellant has completed three (3) years tenure at GPS Spinki Killa (5/10/13 to 3/10/2013).**
- 2. That the appellant has not come to the honorable service tribunal with clean hands.**
- 3. That the appellant has suppressed/concealed material facts from the honorable service tribunal.**
- 4. That the appeal is barred by time.**
- 5. That the present appeal is bad in its present form, hence not maintainable and liable to be dismissed with cost.**

- 6. That the appeal is bad for non joineder & miss Joineder of unnecessary points.
- 7. That this Honorable Tribunal has no jurisdiction to entertain the appeal.

RESPCETFULLY SHEWITH:

- 1. Pertains to record.
- 2. Pertains to record.
- 3. Correct. However the appellant served in the said school for more than his normal tenure.
- 4. Incorrect, the appellant has been transferred to GPS Saleem Abad in the best interest of the public & the appellant being a Govt. Servant is suppose to serve where his service is required. More over the appellant has completed three (3) years tenure in GPS Spinki Killa (Transfer order No 355-58 dated 5/10/10 to GPS Spinki Killa ,Charge report & reliving slip from GPS Spinki Killa to GPS Salim Abad through impugned order no 7101-4 dated 3/10/2013 are already annexed . Further the present appeal is in fractious as the appellant has been promoted to BPS 14 through order No.675-79 dated 11/6/2014 & has taken charge as well .Copy already annexed at page 5 & 6.
- 5. Incorrect. The appeal has not been submitted through proper channel. However the appeal is time bar.
- 6. In correct as the present appeal is in fractious & presently there is no vacant post of BPS 14 in the appellant Union Council.
- 7. In correct the appeal has not been submitted through proper cannel & spouse policy is District based instead of union council based. So not applicable in the case.

Grounds.

- a) Incorrect as the present appeal is in fractious & the appellant has suppressed/concealed material facts from the honorable service tribunal. He has no cause of action.
- b) No comments. However each & every case has its own merits and, as per judgment of the superior courts, each case is to be decided on its own merit.
- c) As mentioned in Para "a". As if the impugned order is already set aside that the instant appeal came within Rules 23 of Service Tribunal Rules.
- d) Incorrect.
- e) The present appeal is not maintainable in its original form as the appellant has been promoted to BPS 14 through order no 675-79 dated 11-6-14& has taken over charge copy annexed already.
- f) In correct as per Para mentioned above.
- g) Incorrect as per Paras mentioned above.
- h) In correct .The spouse policy is district based and not applicable in the instant case.
- i) In correct. The impugned order is according to the law & in the best interest of public. No one has a vested right to be posted at particular station.

- j) In correct .The appellant has approached local MPA, the then Deputy Speaker Provincial Assembly Khyber Pakhtunkhwa for cancelation of impugned order& has tried to use political pressure. Copy annexed 10.
- k) The respondents also seek permission of this tribunal to raise additional grounds at the time of arguments.

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

M. J. J. J.
Sub Divisional Education Officer,
(Male) Primary Lachi Kohat.

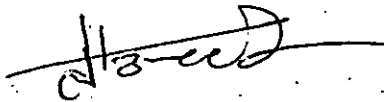
M. J. J. J.
District Education Officer,
(Male) Kohat.

M. J. J. J.
Director,
Elementary & Secondary Education,
Khyber Pakhtoon Khwa Peshawar.

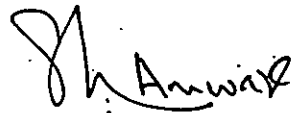
M. J. J. J.
Secretary,
Elementary & Secondary Education,
Khyber Pakhtoon Khwa Peshawar

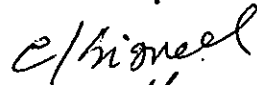
(6)
چارج رپورٹ

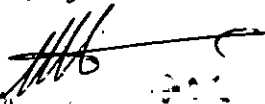
بمطابق حکم نمبر 4-7101 مورخہ 2013-10-03 آمدہ
از دفتر ڈسٹرکٹ ایجوکیشن آفیس (مردانہ) کوٹھڑاٹ
مشاہد انور پی ایس ٹی کا تبادلہ جی پی ایس سینٹی کھ
سے جی پی ایس سلیم آباد کو ہو چکا ہے۔ حکم کے مطابق
مشاہد انور نے آج مورخہ 2013-10-26 کو قبل از دوپہر
جی پی ایس سلیم آباد میں اپنے عہدے کا چارج سنبھال لیا۔
غزوری کاروائی کے لئے چارج رپورٹ کی کاپی دفتر مذکورہ
کو ارسال خدمت ہے۔


ستخط چارج دہندہ

HEAD TEACHER
G.P.S. Balarampur
Kotwa


ستخط چارج گیر بندہ


J. Anwar



6
از دفتر پرائمری سکول ہیڈ ٹیچر سلیم آباد کوھاٹ

سرٹیفیکیٹ

تصدیق کی جاتی ہے کہ مسی شہد انور سینٹر پرائمری سکول ٹیچر بمطابق حکمنامہ نمبری 79-675 مورخہ 11/06/2014 از آمدہ ڈسٹرکٹ ایجوکیشن آفیسر (مردانہ) کوھاٹ، بنیادی سکیل نمبر 14 میں کام کر رہا ہے، نیز مدرس ہذا نے مدرسہ ہذا میں مورخہ 26/10/2013 تبدیل ہو کر آیا۔

(ملک حمید منور)

HEAD TEACHER
P.S. Saleman

ہیڈ ٹیچر

GPS سلیم آباد کوھاٹ

Sub Divisional Education Officer
(Male) Kohat

06/12/2014

(7)

OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY & SECONDARY EDUCATION KOHAT

ADJUSTMENT:

Consequent upon the approval of the competent authority and after rationalization process the following PST's are hereby adjusted in the schools mentioned against each name being surplus from their schools in the interest of public service with immediate effect.

S#	Name of Teacher	From	To
1	KHALID HUSSAIN SHAH PST	GPS LACHI PAYAN	GPS TERAWAL BANDA
2	ADIL MEHMOOD PST	GPS LACHI PAYAN	GPS HASSAN BANDA
3	IMTIAZ AHMAD PST	GPS TC LACHI	GPS WALAI
4	IHSAN ULLAH PST	GPS No.2 MANDOORI	GPS WARSHAND
5	AHMAD NAWAZ PST	GPS GULSHAHKHEL	GPS WARSHAND
6	SHAHEEN BADSHAH PST	GPS MOHSIN KHEL	GPS INZAR WALA
7	LIAQAT ALI KHAN PST	GPS KHADAR KHEL	GPS FAZAL ABAD
8	JAHAN ZAIB KHAN PST	GPS BARAGHZI KALAN	GPS DHOK MASHAL
9	TARIQ MEHMOOD PST	GPS SHAKAR DARA No.2	GPS No.1 DOLY BANDA
10	M. TAHIR PST	GPS KARORI KALA	GPS No.3 SHAKAR DARA
11	SHAHID ANWAR PST	GPS KARORI KALA	GPS SPNKI KALA
12	AMEER SULTAN PST	GPS BORI SAGHRI	GPS DARABO KACH
13	MUHAMMAD SAEED PST	GPS GURGURA	GPS MULA WALI
14	SHARBAT KHAN PST	GPS GURGURA	GPS CHISHANA GHUNDA
15	SALEHEEN PST	GPS PAKKA SHARKI	GPS PALOSI BANDA

NC TA/DA is allowed.

Charge reports should be submitted to all concerned.

Note: All Head Teachers are directed not release their self before handing over complete school record to concerned ones.

(IMTIAZ UL HAQ)

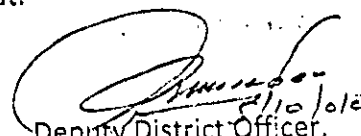
Executive District Officer,
E&S Education Kohat.

No. 355-58 Rationalization_2010

Dated. 5-10-2010

Copy of the above is forwarded to the..

1. Directress Elementary & Secondary Education KPK, Peshawar.
2. District Officer, (Male) E&S Education Kohat.
3. PA to Executive District Officer, E&SE Kohat.
4. Accountant of the local office.


Deputy District Officer,
(Male)E&SE Lachi.

ذرا دل سوال کر لو انانہ کہیں ۲۹

3

پتھر کے دھن کے نام کا حصہ ۵

(۱۱)

سوال کے بیوں کے نام کا حصہ ۵

(۱۲)

فوسم کرفا میں کور کے جمل بیوا بیوں کے حصہ ۵

(۱۳)

فوسم بیتر فا میں کور کے بیوان بیوا بیوں کا حصہ ۵

(۱۴)

آج کل بازار میں کور کے بیوان بیوان کا حصہ ۵

(۱۵)

ذرا دل سوال کر لو انانہ کہیں ۲۹

4

پتھر کے دھن کے نام کا حصہ ۵

(۱۶)

۲۱

چارج رپورٹ

No 2325

13-10-10

بمطابق حکم نمبر 355-58 مورخہ 05-10-2010

آمدہ از دفتر ایگزیکٹو ڈسٹرکٹ آفیسر اینڈ سیکنڈری ایجوکیشن گواہٹ شاہد انور پی ایس ٹی کاتاولہ

جی پی ایس کروڑی محلہ ضلع گواہٹ سے جی پی ایس سینکڑی محلہ ضلع گواہٹ کو ہجڑا ہے۔

حکم کے مطابق شاہد انور نے آج مورخہ 13-10-2010 کو

جی پی ایس سینکڑی محلہ ضلع گواہٹ میں قبل از دوپہر اپنے عہدے کا چارج سنبھال لیا۔ ضروری

کارروائی کیلئے چارج رپورٹ کی کاپی دفتر ڈپٹی ڈسٹرکٹ آفیسر (مردانہ) ای اینڈ ایس ایجوکیشن گواہٹ کو ارسال

خدمت ہے۔

[Signature]
 دستخط چارج گیر ہندہ
 13/10/2010

[Signature]
 دستخط چارج دہندہ
 Head Teacher
 G.P.S. Spinkai Kala
 Center Shekardar
 Distt: Kohat

No 2325

(9)

3

فارغ خطی

بحوالہ آر ڈرنمبر 4-7151 بورخہ 2103-10-03 مشاہدہ انور

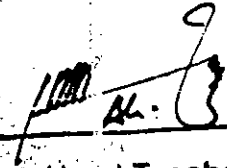
پی ایس ٹی کا تبادلہ جی پی ایس سینکلی حکم سے جی پی ایس سلیم آباد

کو ہرچکا ہے۔ حکم کے مطابق مشاہدہ انور کو آج مورخہ

بعد از دوپہر فارغ کیا جاتا ہے اور اسے

ہدایت کی جاتی ہے کہ جلد از جلد اپنے نئے سکول

میں چارج سنبھال لے۔



دستخط فارغ کنندہ

Head Teacher
G.P.S. Spinkal Kala
Center Shakardara
Distt: Kohat

25/10/13

Emdost No 5082

Dated: 25-10-13

محترم و گرامی قدر ڈسٹرکٹ ایجوکیشن آفیسر سکولز (مردانہ) ضلع کوہاٹ

مذکورہ ذیل برائے مسوخ تبادله آرڈر

14

* مورخہ گذارش ہے کہ میں شاہد انور بی ایس ٹی بنیادی سکول 12 گورنٹ پرائمری

سکول سینکڑی کلیمین کونسل شکر درہ رورل I تحصیل لاجی میں گذشتہ 2 1/2 سال سے

پڑھا رہا ہوں۔ سکول ہذا میں طلباء کی کل تعداد 267 ہے اور تعداد سے مطابق سات (7)

اساتذہ کا سب سے زیادہ موجود ہے جن میں BS-15 کا ایک استاد BS-14 کے دو اساتذہ اور

BS-12 کے چار اساتذہ ہیں جو کہ نئی وضع کردہ پالیسی آفٹر ریٹنڈیشن کے عین مطابق

ہیں۔ (تقریباً)

* ایک استاد حلیل الرحمن BS-14 کا تبادلہ میری جگہ کیا گیا ہے اور مجھے ایک دور دراز سکول سلیم آباد

واقع یونین کونسل سماری تحصیل کوہاٹ تبدیل کیا گیا ہے۔ اس طرح سے BS-12 کے چار اساتذہ

کم ہو کر تین رہ گئے ہیں اور BS-14 کے دو اساتذہ کی تعداد تین ہو گئی ہے جو پالیسی کے مطابق ہیں۔

* کچھ عرصہ قبل میرے والد صاحب کی وفات اور ایک بچے کے پیدائشی طور پر معذور ہونے

کے باعث میں سنگین مالی مشکلات کا شکار ہو گیا ہوں کیونکہ میں گھر کا واحد کفیل ہوں۔

* مذکورہ امور بذمہ استدعا ہے میری تبدیلی کے آرڈر نمبر 4-7105 مورخہ 13-10-3

سیریلی نمبر کا مسوخ کیا جائے۔ شکریہ

ذیل پر آرڈر میں وقت ہر وقت اس وقت کے اسٹاف کے BAN کا آرڈر نمبر ہے

مورخہ 2013-10-07

اپکا تابع فرمان

Amir

Received on
27/11/2013
Nimatah

تعمیرت

شاہد انور PST
7/10/2013
سینکڑی کلیمین کونسل رورل شکر درہ

تحصیل لاجی ضلع کوہاٹ

DEPT. (M) / Kohat

DEPT. (M) / Kohat

Please reconvene the panel of the provincial govt.

Imtiaz Shafiq Qureshi Advocate
Deputy Speaker
Provincial Assembly Khyber Pakhtunkhwa

26/12/2013
Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Feshawar

[Signature]

حالیہ GPS = سلیم آباد
یونین کونسل سماری
تحصیل کوہاٹ

کے آرڈر میں مسوخ کر دیے ان کا نمبر آرڈر نمبر ہے

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

In Re:
Service Appeal No.738/2015

Shahid Anwar **Petitioner**

Versus

Govt. of KPK & others **Respondents**

REJOINDER/REPLY OF PARAWISE
COMMENTS FILED BY
RESPONDENT NO. 1 TO 4, ON
BEHALF OF APPELLANT

Respectfully Sheweth:

That the first note of the respondents is incorrect, irrelevant and contradictory, the impugned order, dated 03.10.2013 was issued without observing rules/policy of the Govt, there is no provision in Khyber Pakhtunkhwa (Appointment, Deputation, Posting and Transfer of Teachers, lectures, instructors and Doctors) regulating Act, 2011, that a PST should be transferred from his own union council (U-C) or adjacent Union Council to for flung area located in another tehsil of the Distirct.

This Honourable Tribunal set aside the impugned order dated 03.10.2013, ^{In case of PST at S.No 2 of the impugned order.} in the light of the above mentioned Act, and having common interest of law and facts, the respondents were bound to accept the Department Appeal No.57 dated 16.03.2015 of the appellant instead of involving him in unnecessary litigation in view of the judgment of Supreme Court 1996 SCMR 1185, 2009 SCMR-I at the time of issuing the impugned order 03.10.2013 the appellant was in BPS-12, he was promoted after 5 months of his transfer order. He was not promoted ^{against} any specific post and he is still posted in GPS Saleem Abad, where no BPS-14 Post exists. His successor Mr. Jalil ur Rehman *at* S.No.5 of the impugned order 03.10.2013, was transferred to Spinki Kala, was in BPS-14 and promoted/transferred to Govt. Middle School Brghdi Kalan vide DEO (M) Kohat order No.7013-17 dated 28.11.2014. Thus the post of BPS-14 in G.P.S Spinki Kale, is still lying vacated. Similarly the PST BPS-14 at S.No.8 of the impugned order, was transferred against PST BPS-12, therefore ^{The} ~~an~~ appellant can also be transferred against BPS-12, post lying vacant at S.No.5, Shakardara Urban.

This Honorable Tribunal set aside the impugned order dated 03.10.2013, in the light of the above mentioned Act, and having common interest of law and facts, the respondents were bound to accept the Department Appeal No.27 dated 18.03.2015 of the appellant instead of involving him in unnecessary litigation in view of the judgment of Supreme Court 1998 SCMR 1185, 2009 SCMR-1 at the time of issuing the impugned order 03.10.2013 the appellant was in BP2-12, he was promoted after 2 months of his transfer order. He was not promoted any specific post and he is still posted in G.P.2 Sahamabad, where no BP2-14 Post exists. His successor Mr. Jallil ur Rehman 2.No.5 of the impugned order 03.10.2013, was transferred to Spinki Kala, was in BP2-14 and promoted/transferred to Govt. Middle School Bghai Kalar vide DCO (M) Kanat order No.7013-17 dated 28.11.2014. Thus the post of BP2 14 in G.P.2 Spinki Kala, is still lying vacated. Similarly the P2T BP2-14 at 2.No.8 of the impugned order was transferred against P2T BP2-12, therefore an appellant can also be transferred against BP2 12, post lying vacant at 2.No.5, Shkarbora Udhari.

The appellant did not complete his tenure in Spinki Kale, he took charge on 18.01.2011. The Appellant has to compel to join duty in Saleem Abad. The appellant could be adjusted under spouse policy.

PRELIMINARY OBJECTION

1. Incorrect, the impugned order dated 03.10.2013 has been set aside by this Honourable Tribunal as against law/rules and the respondent No.3 cancelled the transferred order of Muhammad Afzal, and the respondents were bound to treat the appellant in the same manner in view of the judgment of Hon'ble Supreme Court as mentioned above.
2. Incorrect.
3. Incorrect
4. Incorrect
5. Incorrect
6. Incorrect
7. Incorrect

ON FACTS:

1. No need to reply.

2. No need to reply.
3. That the respondents suppressed/concealed the facts by providing wrong information about his tenure just to strengthen the illegal act.
4. Incorrect details have already given.
5. Incorrect. appeal has properly entered in School Dairy Register at End No.5064 on 07.10.2013 handed to SDO Lachi and Second appeal No.57, dated 16.03.2015, has sent through head teacher.
6. Incorrect. there are 3 vacant post.
7. Incorrect. appeals submitted according to law and appellant also entitled under the spouse policy to transfer him in his own union council.

GRUNDS:-

- A. Incorrect.
- B. No need of reply.
- C. Incorrect.
- D. Incorrect.

- E. Incorrect. already explained.
- F. Incorrect.
- G. Incorrect.
- H. Incorrect.
- I. Incorrect. the impugned order has declared illegal.
- J. Incorrect.
- K. No need of reply.

It is, therefore humbly prayed that on acceptance of this rejoinder, the appeal of the appellant may kindly be accepted as prayed for.

Petitioner
Through

Dated: 11.05.2016


Hassan U.K Afridi
Advocate, Peshawar

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

In Re:
Service Appeal No.738/2015

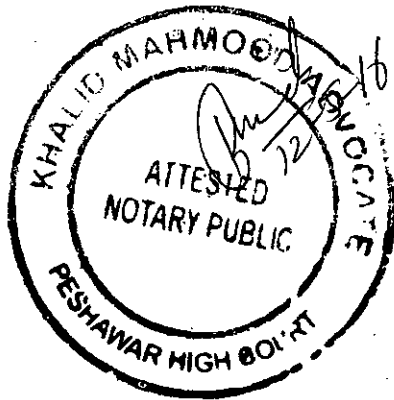
Shahid Anwar **Petitioner**

Versus

Govt. of KPK & others **Respondent**

AFFIDAVIT

I, Hassan U.K Afridi Advocate High Court as per instructions of my client, do hereby solemnly affirm and declare on oath that the contents of the accompanying **rejoinder** are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Hon'ble Court.



DEPONENT



I. (PA-4)

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KOHAT.

NOTIFICATION.

In continuation of this office order No. 14-1119, Dated 04/03/2014, Mr. Shahid Anwar PST, GPS Saleem Abad is hereby promoted from BPS-12 to BPS-14 with effect from 04/03.2014.

Necessary entries to this effect should be made in their service book accordingly.

Terms and conditions:-

1. They would be on probation for period of one year extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. Their service can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be proceeded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their Inter-Se-Seniority on lower post will remain intact.
6. No TA/DA is allowed for joining his duty.
7. They will give an undertaking to this effect to be recorded in their service book.


GHULAM QASIM KHAN
District Education Officer
(Male) Kohat.

Endst. No. 675-79 /PS. Promotion.

Dated 11 1 06 2014

Copy forwarded for information and necessary action to the:-

1. District Account Office, Kohat
2. Sub Divisional Education Officer (Male) Primary Kohat.
3. PA to Director E&SE Khyber Pakhtoon Khwa Peshawar.
4. Official concerned.
5. M/File.


Sub Divisional Education Officer
(Male) Primary Kohat.

Annex IV

17

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KOHAT

CANCELLATION

Consequent upon the approval of the competent authority, adjustment order issued vide this office order No.6214-18 dated 29/08/2013 in respect of the following PST is hereby cancelled in the interest of public service with immediate effect.

S.No	Name with School	Remarks
1	Muhammad Haleem, PST GPS No. Shakardara	S.No15
2	Abdul Majced, PST GPS No.1 Chokhaki	S.No.67
3	Luqman Khan, PST GPS Dervizai Banda S/Dara	S.No.72
4	Attur Rehman PST GPS Showar Pasha	S.No.87
5	Abdul Nacem, PST GPS Nandraka	S.No.81
6	Muhammad Akram, PST GPS Spinmari	S.No.82
7	Pervizai Iqbal PST GPS Badasum	S.No.95
8	Zahoor ud Din PST GPS Spinki Killa	S.No.100
9	Tariq Mehmood PST GPS No.2 S/Dara	S.No 17
10	Muhammad Younas PST GPS Parka Topi	S.No. 22
11	Nazir ur Rehman PST GPS Shark	S.No. 20
12	Akhtar Zaman PST GPS Andoorni Chashmi	S.No. 21
13	Sadiqullah PST GPS Chappri Sagari	S.No. 96
14	Muhammad Qadir, PST GPS No.2 Shakardara	S.No. 16
15	Asghar Khan, PST GPS Janak	S.No. 86
16	Muhammad Ibrar PST GPS Rakwan	S.No. 101
17	Nasir Mehmood PST GPS Guirga	S.No.79

(ZAHID RASHEED)
DISTRICT EDUCATION OFFICER
(MALE) KOHAT

Endst.No. 6214-18 dated 29/8/2013

Copy to the:-

1. District Accounts Officer Kohat
2. SDEO (M) Kohat & Lachi
3. Head Teacher Concerned

DY DISTRICT EDUCATION OFFICER
(MALE) KOHAT

DY DISTRICT EDUCATION OFFICER
(MALE) KOHAT

(27)

Annex IV

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KOHAT

CANCELLATION

Consequent upon the judgment of honorable Service Tribunal Peshawar under passed appeal No. 103/14, Muhammad Afzal and appeal No. 104/2014 Khursheed vs DEO (Male) and others. The following order in respect of Muhammad Afzal PST GPS, Bari Saghri to GPS No.1 Surgui and Muhammad Khursheed : : IT GPS Karori Kalay to GPS Banda Fateh Khan vide this Office Order No. 7101-4 dated 03.10.2013 at S.No. 2 and No. 7105-8 dated 03.10.2013 at S.No.2 are hereby cancelled with immediate effect.

- Sd-

(ROZ WALI KHAN)
DISTRICT EDUCATION OFFICER
(MALE) KOHAT

Encl.No. 1173-76 dated 05/03 /2015
Copy to the:-

1. Registrar Service Tribunal Khyber Pakhtunkhwa Peshawar.
2. District Accounts Officer Kohat
3. SDEO (M) Kohat & Lachi.
4. Officials Concerned.


DY DISTRICT EDUCATION OFFICER
(MALE) KOHAT

05/3/2015

Annex VII

محترم ڈی جی ایڈمنسٹریشن گورنمنٹ آف پاکستان (مردانہ) ضلع کوہاٹ

مضمون: اپیل بنیاسیت منسوخی تبادلہ آرڈر

مردبانہ گزارش ہے کہ میں شاہد انور PST - بنیادی اسکول 12 - GPS سیکولری کالج یونین
کوئٹہ شکر روڈ تحصیل لایچی میں 2 1/2 سال سے پڑھا رہا ہوں۔

میں سکول ٹیسٹس طلبہ کی کل تعداد 267 ہے اور انڈیا کے مطابق 7 اساتذہ کامل سٹاف موجود ہے۔

میں سے GPS-15 ایک ٹیچر، GPS-16 کے دو اور GPS-12 کے چار اساتذہ ہیں۔

جوئی دستہ کردہ پالیسی (آفٹر ریشٹرائیونگ شرح 40-1 کے مطابق پر ہے۔

* ایک ٹیچر جلیل الرحمن GPS-14 کا تبادلہ میری جگہ کیا گیا اور مجھے ایک دور ملا سکول سلیم آباد واقع تحصیل کوہاٹ

یونین کوئٹہ سہاروی کیا گیا۔ جس کا فائدہ 70 ملو میٹر ہے جبکہ قریب تر سکولوں میں خالی پوسٹ موجود ہیں

* اس طرح سے 12 GPS کے چار اساتذہ کم ہو کر تین رہ گئے اور GPS-19 کے بڑے کچھ بچے ہو گئے

* میں جو ٹیچر بائی ٹیور اور سینئر بائی سرورس ہوں۔ دونوں صورتوں میں میری تبدیلی غلط ثابت ہوئی

* میری مہلکات کی حد تک تبدیلیوں پر Bon ہے اور اس دوران میری تبدیلی کی گئی ہے۔

* میں اس تبدیلی کو سیاسی انتظامی کارروائی قرار دیتا ہوں یہ مجھے پریشان کرنے اور مالی مشکلات میں

ڈالنے کی بڑی نیت سے کرائی گئی ہے۔

لہذا مردبانہ استدعا ہے کہ میری یہ تبدیلی راجح اور فائز آرڈر نمبر 101-14-101-101-101

3-10-2013) منسوخ فرمائی جائے۔ راجح دیگر میں تالوئی چارہ جوئی کا اپنا حق استعمال کروا لیا گیا۔

07-10-2013

آئیے کا تاریخ زمان شاہد انور PST - GPS سیکولری کالج - روڈ شکر روڈ تحصیل لایچی ضلع کوہاٹ

نقول برائے کارروائی و اطلاع ...

(ج) جناب ڈائریکٹر صاحب ایڈمنسٹریشن گورنمنٹ آف پاکستان (مردانہ) ضلع کوہاٹ

Endost No 50.64

Dated 07-10-2013

Annex - VIII

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KOHAT
RETIREMENT/ SANCTION

Consequent upon the approval of the competent authority, Sanction is hereby accorded to the grant of retirement from service in respect of following PST/Class-IV as due and admissible to them under the rules.

S.#	Name & Designation	Date of retirement
1	Mujahid Hussain PST GPS-Braghdi Kelan	30-11-2014(FN)

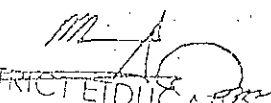
Necessary entry to this effect should be made in their service book accordingly

(GHULAM QASIM KHAN)
DISTRICT EDUCATION OFFICER
(MALE) KOHAT

Endst.No. 2985-86 dated 12/12/2014

Copy to the:-

1. District Accounts Officer Kohat
2. SDEO (M) Kohat and Lachi


DY. DISTRICT EDUCATION OFFICER
(MALE) KOHAT

12/12/14

Vacant Post

(H)

Annex IX

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KOHAT

ADJUSTMENT

Consequent upon the approval of competent authority impartial modification vide this office order No.7105-8 dated 03/10/2013, please read are as under on their own pay and grade with immediate effect in the interest of public service

S>No.	Name & Designation	From	To	Remarks
1	Muhammad Saeed, PSHT No.2 Chorlaki	Under transfer to GPS Dh: Amir Shah	GPS Musal	VS No.2
2	Bad Jan, PSHT	Shah GPS Musal	GPS Dh: Amir Shah	VS No.1
3	Akhtar Hussain, PST GPS No.3 S/Dara	Under transfer to GPS Shawaki	GPS Braghdi Killa	Need Basis

S-NO 9

Charge report should be submitted to all concerned

(ZAHID RASHEED)
DISTRICT EDUCATION OFFICER
(MALE) KOHAT

Endst. No. 2212-15 dated 2/1/10/2013
Copy to the:-

1. DAO Kohat
2. SDEO (M) Kohat
3. SDEO (M) Lachi
4. Head Teacher Concerned

DY DISTRICT EDUCATION OFFICER
(MALE) KOHAT

Violation of
Killa

Annex X

PUC Page-

The following PST teachers BPS-14 are hereby proposed for adjustment on dire need basis on the recommendation of Hon: Halq MPA are put up for further perusal and order please

S#	Name & Designation	from	To	Remarks
1	Muhammad Shafiq PST	GPS No.1 Sur Gul	GPS Bori Saghri	VSNo.2
2	Muhammad Afzal PST	GPS Bori Saghri	GPS No.1 Sur Gul	VSNo.1
3	Nadir Perveez, PST	GPS Dh:Khajab Gul	GPS No.2 Chorlaki No.2	VSNo.4
4	Akhtar Zaman PST	GPS No.2 Chorlaki	GS Dh:Khajab Gul	VSNo.3
5	Jalil Ur Rehman PST	GPS Salim Abad	GPS Spinki Killa	VSNo.6
6	Shahid Anwar PST	GPS Spinki Killa	GPS Salim Abad	VSNo.5
7	Muhammad Tariq, PST	GPS Sudal	GPS Kiro sam	Need Basis
8	Yousaf Khan, PST	GPS Shawaki	GPS No.3 S/Dara	VSNo.9
9	Akhtar Hussain, PST	GPS No.3 S/Dara	GPS Shawaki	VSNo.8
10	Amir Kamal, PST	GPS Inzerwala	GPS Lachi Bah	Need Basis
11	M. Qasir PST	GPS Banda Felha Khan	GPS lachi Pawan	Need Basis

✓

D/ASST

DISTRICT ECU OFFICER
(MALE) KCHAI

Annex 11

27

Page-

The following PST teachers BPS-14 are hereby proposed for adjustment on need basis on the recommendation of Hon: Haq MPA are put up for further perusal and order please

No	Name & Designation	From	To	Remarks
1	Atta ur Rehman, PST	GPS Sowa Basha	GPS Gurgura	In place of Nasir Mehmood PST
2	Khalid Mehmood, PST	GPS No.1 Sur Gul	GPS No.3 S/Dara	VSNo.3
3	Tareef Gul PST	GPS No.3 S/Dara	GPS No.1 Sur Gul	VSNo.2
4	Akhtan Hussain PST	GPS Muslim Abad No.3	GPS Nandraka	VSNo.5
5	Muhammad Rashid, PST	GPS Nandraka	GPS Muslim Abad No.3	VSNo.4
6	Sabir Hussain, PST	GPS Taloozi Banda	GPS Karosam	Need basis
7	Attaq ur Rehman, PST	GPS Badasam	GPS No.1 S/Dara	Need Basis
8	Majid Hussain, PST	GPS Doli Banda	GPS Badasam	VSNo.7
9	Mursaleen Khan, PST	GPS Sheikabland Banda	GPS Gurgura	VSNo.10
10	Sherbat Khan, PST	GPS Gurgura	GPS Shekhabland Banda	VSNo.9
11	Asif Khan, PST	GPS Rakwan	GPS Gabri	Need Basis
12	Amir Khan, PST	GPS Ghurzandi	GPS Bori Saghri	VSNo.13
13	Muhammad Afzal, PST	GPS Bori Saghri	GPS Ghurzandi	VSNo.12
14	Rahimullah PST	GPS Braghdi Killa	GPS No.3 S/Dara	Need Basis

S.D.O. (M) Lachi

D/Asstt:

BY DISTRICT EDU OFFICER

PJC Page-

The following PST BPS-15 teachers are hereby proposed for adjustment on the need basis on the recommendation of Hon: Halq MPA are put up for further perusal and order please

S/N	Name & Designation	From	To	Remarks
1	Nafeez Ahmad PST	GPS Kiroor Sam	GPS Kirrori Killa	VSNo.2
2	Fazal Haq, PST	GPS Kirrori Killa	GPS Kiro Sam	VSNo.1
3	Muhammad Shafiq, PST	GPS Maindina Colony	GPS No.1 S/Dara	V>S>No.
4	Muhammad Ismail, PST	GPS No.4 S/Dara	GPS Miandiana Colony	V.S.No.3
5	Muhammad Rauf, PST	GPS Dh: Amir Shal	GPS No.2 Chorlaki	VSNo.6
6	Muhammad Saeed, PST	GPS No.2 Chorlaki	GPS Dh: Rauf Shih	VSNo.5
7	Muhammad Khurshid, PST	GPS Shavaki	GPS S/Dara No.4	VSNo.8
8	Muhammad Iqbal, PST	GPS No.1 S/Dara	GPS Shavaki	VSNo.7
9	Muhammad Ayub, PST	GPS Mandoori	GPS Sawari Khawa	VSNo.10
10	Gul Ghani, PST	GPS Sawari Khawa	GPS Mandoori	VSNo.11
11	Zameer Khan, PST	GPS Spinnari	GPS Rakwan	V.S.No.12
12	Iftikhar, PST	GPS Rakwan	GPS Spinnari	VSNo.11
13	Saeed ur Rehman, PST	GPS No.2 Androoni Chashmi	GPS Bori Saghri	VSNo.14
14	Amir Sultan, PST	GPS Bori Saghri	GPS Androoni Chashmi	VSNO.13
15	Shakir Hussain, PST	GPS Banda Fetha Khan	GPS No.2 S/Dara	Temporary basis

D/Asstt:

SIDE (M) Lachi.

ALLAH
 DISTRICT EDUCATION OFFICER
 MAHAJAL
 KHELAT




Email: bebaakawaz@gmail.com www: bebaak.com (2562)

www.facebook.com/bebaakawaz

Daily **BEBAAK AWAZ** Kohat

برونگلے بے باک آواز

15 مارچ 2013

45

روز سیاسی مخالفین اساتذہ کو جن جن کرتبدیل کیا جا رہا ہے جو شکرورد کی پرانی روایت ہے مگر اس بار تو عوام تحریک انصاف کی تبدیلی سے حیران رہ گئے جب کلاس فور ملازمین بھی زیر عمل

شکرورد (پیشروائی) تحریک انصاف کی زیادے بہت پرانی رویت ہے اگرچہ موجود سے ہے اس کا امکان بہت کم تھا کہ عوام اس وقت

آئے روز سیاسی مخالفین اساتذہ کو جن جن کرتبدیل کیا جا رہا ہے جو شکرورد کی پرانی روایت ہے مگر اس بار تو عوام تحریک انصاف کی تبدیلی سے حیران رہ گئے جب کلاس فور ملازمین بھی زیر عمل

شکرورد (پیشروائی) تحریک انصاف کی زیادے بہت پرانی رویت ہے اگرچہ موجود سے ہے اس کا امکان بہت کم تھا کہ عوام اس وقت

تبدیلی پر جن عوام سیاسی زندگی کا شمارہ محنت وقت میں اس روایت کا امکان نہیں تھا کیونکہ جماعتی سے دوچار ہونے جب حسب سابق

رہے ہیں شکرورد میں انہیں نے اپنا ساتھ دئے موجودہ اسم لی اسے کا تعلق تحریک انصاف کے اساتذہ کے چاروں کا سلسلہ شروع ہوا اور جو

چاروں کے ساتھ وہ ایک نئی تہاں جاری ہے اور اس کے ساتھ وہ ایک نئی تہاں جاری ہے اور اس کے ساتھ وہ ایک نئی تہاں جاری ہے اور اس کے ساتھ وہ ایک نئی تہاں جاری ہے

روز سے ایک آواز آ رہا ہے

شکرورد (پیشروائی) تحریک انصاف کی زیادے بہت پرانی رویت ہے اگرچہ موجود سے ہے اس کا امکان بہت کم تھا کہ عوام اس وقت

تبدیلی پر جن عوام سیاسی زندگی کا شمارہ محنت وقت میں اس روایت کا امکان نہیں تھا کیونکہ جماعتی سے دوچار ہونے جب حسب سابق

رہے ہیں شکرورد میں انہیں نے اپنا ساتھ دئے موجودہ اسم لی اسے کا تعلق تحریک انصاف کے اساتذہ کے چاروں کا سلسلہ شروع ہوا اور جو

چاروں کے ساتھ وہ ایک نئی تہاں جاری ہے اور اس کے ساتھ وہ ایک نئی تہاں جاری ہے اور اس کے ساتھ وہ ایک نئی تہاں جاری ہے اور اس کے ساتھ وہ ایک نئی تہاں جاری ہے

شکرورد (پیشروائی) تحریک انصاف کی زیادے بہت پرانی رویت ہے اگرچہ موجود سے ہے اس کا امکان بہت کم تھا کہ عوام اس وقت

تبدیلی پر جن عوام سیاسی زندگی کا شمارہ محنت وقت میں اس روایت کا امکان نہیں تھا کیونکہ جماعتی سے دوچار ہونے جب حسب سابق

رہے ہیں شکرورد میں انہیں نے اپنا ساتھ دئے موجودہ اسم لی اسے کا تعلق تحریک انصاف کے اساتذہ کے چاروں کا سلسلہ شروع ہوا اور جو

چاروں کے ساتھ وہ ایک نئی تہاں جاری ہے اور اس کے ساتھ وہ ایک نئی تہاں جاری ہے اور اس کے ساتھ وہ ایک نئی تہاں جاری ہے اور اس کے ساتھ وہ ایک نئی تہاں جاری ہے

Registered

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (MALE) PRIMARY LACHI

No: 1442-43

Dated: 5/4/16

To

Dr. Saad Ullah Jan

Subject:

SUPPLY OF INFORMATION/ DOCUMENTS REGARDING TRANSFER OF PST UNDER R.T.I ACT 2013.

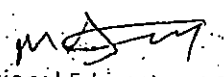
Memo


Reference to your letter #Nil Dated 26-03-2016, it is stated that office record was re checked regarding the information which you have requested and found that this office has never ever submitted proposal/ recommendation regarding the transfer of PSTs issued by DEO (M) Kohat under various endorsement numbers mentioned in your letter sent to this office on 22-02-2016. Furthermore the transfer orders you mentioned in your letter on 22-02-2016 were issued prior to the joining of undersigned.

Ends:

Date:

1. District Education Officer (Male) Kohat


Sub Divisional Education Officer
(Male) Primary Lachi.


Sub Divisional Education Officer
(Male) Primary Lachi.

MINUTES OF MEETING

A meeting was held under the Chairmanship of Mr. Imtiaz Shahid Qureshi Advocate, Hon'ble Deputy Speaker, Provincial Assembly of Khyber Pakhtunkhwa on Tuesday, 11 June 2013 at 11.00 A.M. in the Conference Room of the Provincial Assembly Secretariat Khyber Pakhtunkhwa Peshawar to discuss various issues in Education sector pertaining to Constituency PK-38 and 39 Kohat.

The following Officers attended the meeting:-

- 1- Mr. Zahid Rashid District Education Officer (M) Kohat.
- 2- Mr. Sharullah Khan SDEO (M) Lachi.
- 3- Syed Ghafoor Shah SDEO (M) Kohat.
- 4- Mst. Hasrat Zuhra SDEO (F) Kohat.
- 5- Mr. Hazrat Gul. ADEO (P&D) Kohat.

Besides, Mr. Ziaullah Khan Bangash, Hon'ble MPA PK-38, Brig. © Muhammad Ali, Mr. Ishfaq Sajid Qureshi and Mr. Sohail Bangash also attended the meeting.

The meeting started with the recitation from the Holy Quran.

Contd. Page-----2-----

No PA / KAK / PS / 2013 / 12363 - 68 27 16-6-2013

At the outset, the Chair warmly welcomed the participants of the meeting and said that Constituency PK-39 Kohat was comprising of scattered and backward areas and its people have serious reservations/concerns about postings/transfers/promotions etc made during the Interim Government. He expressed his dissatisfaction over the said process and emphasized upon the District Education Officer (Male and Female) to probe into it, so as to remove the grievances of the people. He asked Mr. Zahid Rashid, District Education Officer (Male) to work out a possible solution by easing and mitigating the agonies of the teachers' community of the areas. The District Education Officer accepted the fact that transfers/postings etc, had been made in various categories, which were lying pending for the last two years. He also briefed the Forum about the present position and ratio of all the categories of Teachers versus Students and presented detailed lists to the Chair, which were discussed in detail.

Mr. Ziaullah Khan Bagash, Hon'ble MPA PK-38 informed the meeting that there were clear orders of the Apex Court suspending/terminating all appointments/transfers/promotions etc made thereby during the Interim Government, therefore, he made a request that such decisions should be reversed in the light of the Supreme Court decision. He proposed that Parents Teachers' Councils should be re-constituted and assured the meeting that he would himself keep a vigilant eye over the process of re-constitution of PTCs. In response, the DEO (Male) told the meeting that he was not in receipt of such orders from the Supreme Court nor from any other quarter concerned and the Director Education had informed that there was no ban on postings/transfers. He further told that the proposal made by Mr. Ziaullah Khan Bagash, Hon'ble MPA PK-38, would be implemented in letter and spirit. However, he was directed by the Chair to obtain copy of the decision of the Supreme Court from the quarters concerned for action.

The following agenda items were discussed one by one:-

- 1- The present Education Policies and their implementation.
- 2- Details of present postings/transfers and promotions etc.
- 3- Number of schools including Primary, Middle, High and Higher Secondary in PK-38 and 39.
- 4- Shortage of staff in various Schools in PK-38 and 39.
- 5- Provision of facilities to male and female Schools i.e. water, electricity and toilets etc.
- 6- Present state of furniture items at various Schools in PK-38 & 39.
- 7- Position of sanctioned and vacant posts at various Schools in PK-38 & 39.
- 8- Upgradation Plan of Schools on need basis.
- 9- The dilapidated condition of buildings of various Schools and their re-construction Plan.
- 10- Construction of additional rooms where necessary.
- 11- Employment of Teachers by BISE without consultation of EDO (Male and Female).
- 12- The degrading state of Education standards.

Besides other issues, Mr. Hazrat Gul ADEO (P&D) Kohat briefed the chair about the physical progress report on ADP schemes for the years 2006-2007, 2007-2008, 2008-2009, 2009-2010, 2010-2011, 2011-2012 and 2012-2013.

The SDO (F) Kohat informed that the post of SDO (F) Lachi was vacant and she was holding the dual charges. Thus she was facing great difficulty in performing her duty. She requested that the said post may be filled-in as soon as possible.

Shortage of staff at GFS Dhand Bakhtawara and GHSS Dhand Saghri was also discussed in the meeting and it was felt necessary to provide the required staff at first priority.

After thorough discussion the following decisions were arrived at :-

1- It was decided that all the adjustment & transfers etc. should be cancelled forthwith and such process should be made in consultation with the Hon'ble Deputy Speaker and concerned MPAs in order to do justice and facilitate the deserving people.

2- BISE should be made bound not to depute any Teacher to perform duty in the Examination Halls or inside the BISE without the recommendations of the Education Department. If any teacher approached BISE in this regard without the permission of EDO, he will be dealt with strictly and suspended on the spot.

3- All the PTC Associations should be re-organized in consultation with the people of the areas and concerned MPAs for which every possible help would be extended to them by the concerned MPAs.

4- The Education Department should make plans for the next 5 and 10 years based on the projected requirements of the locals. The plan should include upgradation from Primary to Middle, Middle to High and High to Higher Secondary levels. The requirements of Degree Colleges should also be included at required location. It would also include the re-construction of existing schools which are either not suitably located, or are in dilapidated state or required re-location due to the requirements of more space on upgradation.

5- The DEO (Male and female) were instructed to furnish detailed lists of those Schools where additional rooms were required to be constructed.

6- All the newly created posts should be filled-in in accordance with laid down criteria in consultation with the concerned MPAs.

7- The DEO will submit details of those Schools having shortage of facilities like potable water and electricity. Also furnish details of furniture item deficiencies schoolwise.

8- Details of recently adjusted/transferred teachers at various Schools.

9- Details of PTC funds where its use was not carried out according to the laid down policy

10- Provide copies of Job Description of DEO, Education Act, Education Rules (if any), Service Rules, Government Policies on Postings/Transfers/Promotion/Training of Teachers, Curricula and Text Books and the list of politically victimized teachers during the last 5 years.

It was further decided in the meeting that pointwise reply according to the discussed agenda should be furnished by the DEO (Male and Female) Kohat to the Chair at the earliest.

The Chair also noted with grave concern the absence of the DEO (F) Kohat in the meeting and issued instructions that such practice shall not be tolerated in future.

In the end the Chair once again thanked the participants of the meeting and said that merit should be the first preference by providing due justice to every deserving person and no one be deprived of his/her due right. He said that no political interference would be done and all the adjustments/posting/transfers and promotions etc. would be carried out according to government policy being re-framed in the light of the manifesto of Tehrik-e-Insaf. He advised the officers to perform their duties devotedly and honestly without fear of interference by any quarters. He stressed that education standards must be enhanced at all cost. Quality education of international standard is the ultimate objective of PTI Government and this objective must be achieved with utmost endeavor of all concerned Insha'llah.

The meeting ended with a vote of thanks from the Chair.

These Minutes are issued after perusal and approval by the Chair.

(NAEEM-UR-REHMAN)
P.S. TO DEPUTY SPEAKER

Annex VI

DOMICILE CERTIFICATE

I declare that I am born of parents, who permanently domiciled in N.W.F.P., having born in this Province.

I was born at Shakarदारو

Signature Shahid Anwar

Resident of Shakarदारو

Tehsil Kohat

District Kohat

Dated 8-6-1987

In pursuance to the declaration, dated 8-6-1987

SHAHID ANWAR son of Aminullah Khan

Resident of Shakarदारو Tehsil Kohat District Kohat

to the effect that he has been born of parents, who are permanently domiciled in N.W.F.P.

It is hereby certified that the said Mr. Shahid Anwar parents are permanent residents of N.W.F.P., having been born within it.

I have satisfied myself from my own knowledge, by verification through Tehsildar that the above declaration is true and certify accordingly.

Given under my hand and that the Seal of the Court of this,

14th day June 1987

Juman
Magistrate 1st Class 14/6/87
EAC B KSH

NOTARISED

Ch. Jee
Deputy Commissioner, Kohat.

No. 483 D. 14/6/87

Dated 15/6 1987

KHYBER PAKHTUNKWA SERVICE TRIBUNAL, PESHAWAR

No. 1391 /ST

Dated 25 /5 / 2017

To

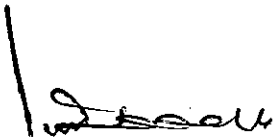
The District Education Officer (M),
Government of Khyber Pakhtunkhwa,
Kohat.

Subject: -

JUDGMENT IN APPEAL NO. 738/2015, MR. SHAHID ANWAR.

I am directed to forward herewith a certified copy of Judgement dated 16.5.2017 passed by this Tribunal on the above subject for strict compliance.

Encl: As above


REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.

11-6-2013

Transferred 19/9/2016

31

OFFICE OF THE DISTRICT EDUCATION OFFICER, (MALE) KOHAT

SURPLUS ADJUSTMENT ORDER

In pursuance of the ERSE Department Notification No. SO (B&AO)/14/2016-17/Rationalization dated 08/08/2016 and in consultations with the Nazim District Government Kohat in light of L&RDD Notification No. SOG (L5) 7-1/Misc/ 2016/Volume-11 dated 08/08/2016, the adjustment of the following teachers under the rationalization policy is hereby ordered in their own Pay and Scales in the public interest with immediate effect.

S NO	NAME OF TEACHER	FROM	TO	REMARKS
1	Abdul Hameed PST	GPS Baqi Zai No.3	GPS Mero Zai	Surplus Adjustment
2	Muhammad Shoaib PST	GPS Baqi Zai No.3	GPS Baqi Zai No.1	Surplus Adjustment
3	Khalid Zahoor PST	GPS Jaded Banda No.2	GPS Shadi Khel No.2	Surplus Adjustment
4	Saghir Ahmad PST	GPS Baqi Zai No.1	GPS Baqi Zai No.2	Surplus Adjustment
5	Syed Wajid Shah PST	GPS Sheikhan	GPS Bahadar Kot	Surplus Adjustment
6	Azmat Khan PST	GPS Dheri Banda	GPS Cadet College	Surplus Adjustment
7	Shaukat Iqbal PST	GPS Dheri Banda	GPS Dagger Banda	Surplus Adjustment
8	Javed Ibrar PST	GPS Togh Payan	GPS Ghulam Banda	Surplus Adjustment
9	Hussain Khan PST	GPS Kot No.1	GPS Chaloo Ziarat	Surplus Adjustment
10	Doulat Khan PST	GPS Zara Mela No.1	GPS Tangi Banda	Surplus Adjustment
11	Zia ul Haq PST	GPS Zara Mela No.1	GPS Jerna	Surplus Adjustment
12	Naimat Ullah PST	GPS Zara Mela No.1	GPS Jerna	Surplus Adjustment
13	Javed Iqbal PST	GPS Jangle Khel Gate	GPS PAF Base	Surplus Adjustment
14	Tanveer Ahmad PST	GPS Jangle Khel Gate	GPS Jangle Khel No.2	Surplus Adjustment
15	Karamat Ullah PST	GPS Ghari Resaldar	GPS Jangle Khel No.2	Surplus Adjustment
16	Muhammad Javed	GPS Lal Mela	GPS Jangle Khel No.1	Surplus Adjustment
17	Khalid Zahoor PST	GPS Noor Illahi Colony	GPS Dhali Helzadi	Surplus Adjustment
18	Muzafar Khan PST	GPS Helzadi	GPS PAF Base	Surplus Adjustment
19	Muhammad Shabir Jaffar	GPS Uster Zai Payan No.2	GPS Marai Bala No.1	Surplus Adjustment
20	Ashraf Ali PST	GPS Bosi Tang No.1	GPS Khadi Zai	Surplus Adjustment
21	Adnan Abbas PST	GPS Ali Zai	GPS Wazir Killa	Surplus Adjustment
22	Jamil Abbas PST	GPS Landi Kachai	GPS Esi Khel No.2	Surplus Adjustment
23	Ibn e Ali PST	GPS Landi Kachai	GPS Hassan Khel	Surplus Adjustment
24	Umar Din PST	GPS Jangle Khel No.1	GPS KIC Area No.1	Surplus Adjustment
25	Muhammad Irfan PST	GPS Jabal	GPS Dakhli Jabbi	Surplus Adjustment
26	Muhammad Shabir PST	GPS Lal Mela	GPS Anbar Banda No.2	Surplus Adjustment
27	Mehmood Iqbal PST	GPS Ghari Resaldar	GPS Mingan Colony	Surplus Adjustment
28	Mubashir PST	GPS Siab	GPS Dhoke Akbar Khan	Surplus Adjustment
29	Alhauddin PST	GPS ZSA Dad No.1	GPS Dhoke Khan Afzal	Surplus Adjustment
30	Ghulam Rasool PST	GPS Toolang Jaded	GPS Ghurzi No.2	Surplus Adjustment
31	Imtiaz Hussain PST	GPS Uster Zai Bala No.2	GPS Marai Bala No.1	Surplus Adjustment
32	Liaqat Nawaz SPST	GPS Bazid Khel	GPS Aifalah Colony	Surplus Adjustment
33	Hameed Manzoor PST	GPS Saleem Abad	GPS Ziarat Summari No.2	Surplus Adjustment
34	Kinaz Gul PST	GPS Sheikh Bahad Banda	GPS Shadi Khel No.2	Surplus Adjustment
35	Saghir ud Din PST	GPS Khamatoo	GPS Hakim Abad	Surplus Adjustment
36	Muhammad Khan PST	GPS Shadi Khel	GPS Sheikhan	Surplus Adjustment
37	Momin Khan PST	GPS Kamar Dhand No.1	GPS Sur Gul No.3	Actual V/S 38
38	Shakir Mehmood PST	GPS Sur Gul No.1	GPS Kaur Dhand No.1	Actual V/S 17
39	Umar Farooq PST	GPS Dhoke Gul Mir	GPS Toolang Gandinly	Surplus Adjustment
40	Zaid Gul PST	GPS Banda Zamir Gul	GPS Pashu Chanda No.1	Surplus Adjustment
41	Nizakat Khan PST	GPS Dhoke Akbar Shah	GPS Siab	Surplus Adjustment
42	Ubaid Ullah PST	GPS Siab	GPS Billitung No.2	Surplus Adjustment
43	Javed Hussain PST	GPS Dhoke Alwara	GPS Dhoke Munir	Surplus Adjustment
44	Arab Ali PST	GPS Sher Kot	GPS Kizar Banda	Surplus Adjustment
45	Rafaqat Hussain PST	GPS Sher Kot	GPS Kizar Banda	Surplus Adjustment
46	Ishad Ahmad PST	GPS Jabbi	GPS Tanda Banda	Surplus Adjustment
47	Shafiq Hussain PST	GPS Muhammad Zai	GPS Banda Madad Shah	Surplus Adjustment
48	Muhammad Imran PST	GPS Tori Stana No.2	GPS Babari Banda No.2	Surplus Adjustment
49	Muhammad Jan PST	GPS Dervi Khel	GPS Khadi Zai	Surplus Adjustment
50	Nawab Ali	GPS Uster Zai Bala No.2	GPS Kam Sam	Surplus Adjustment
51	Ilanif Gul SPST	GPS Gumbat No.2	GPS Dhoke Abdul Ghaflar	Surplus Adjustment
52	Hamid Ali PST	GPS Marai Bala No.1	GPS Dervi Khel	Surplus Adjustment
53	Shahid Rehman PST	GPS Banda Karim Khan	GPS Nak Band No.2	Surplus Adjustment
54	Tahir Maqsood PST	GPS Boraka	GPS Char Ghari	Surplus Adjustment
55	Zulfiqat Ali PST	GPS Ster Sam	GPS Spinali Sam	Surplus Adjustment
56	Sharafat Khan PST	GPS Shadi Pur No.1	GPS Chaloo Ziarat	AVP
57	Muhammad Saad	GPS Ghari Par	GPS Dhoke Eid Gul	Surplus Adjustment
58	Shahid Anwar	GPS Salim Abad	GPS Kiro Sam	Spouse Policy
59	Khalid Khan	GPS Chechana	GPS Summari Payan	Single teacher School
60	Siraj Shah	GPS Nari Shakkardara	GPS Brughdi Kalan	Surplus Adjustment
61	Inayat Ullah	GPS Gabari	GPS Gurgura	Surplus Adjustment

The wife of the appellant is serving as PST in G GPS Shakkardara U.C. Shakkardara Urban

The appellant at S No 58 transferred & posted in @

G.P.S Kero Same Sodal U.C which not adjacent to his own U.C

Spouse Policy

S NO	NAME OF TEACHER	FROM	TO	REMARKS
62	Muhammad Tariq	GPS Spinkai Killa	GPS Sudal	Surplus Adjustment
63	Irfan Ullah	GPS Bori Saghri	GPS Musal	Surplus Adjustment
64	Aziz ur Rehman	GPS Chorlaki No.1 S/Dara	GPS Nandaruka	Surplus Adjustment
65	Humidain	GPS Mehmandi	GPS Jabal Abad	Surplus Adjustment
66	Kkhusheed Khan	GPS Mehmandi	GPS Lachi No.3	Surplus Adjustment
67	Muhammad Zahid	GPS Sudal	GPS Dhoke Amir Shah	Surplus Adjustment
68	Rehman Ullah	GPS Warshand	GPS Fazal Abad	Surplus Adjustment
69	Shakeel Khan	GPS Viso Sam	GPS Malgin No.3	Surplus Adjustment
70	Younaf Khur	GPS Dervizai Banda	GPS Doli Banda No.1	Surplus Adjustment
71	Shaheen Ba Ishaq	GPS Dhoke Amir Shah	GPS Sheikhano Banda	Surplus Adjustment
72	Asad	GPS Wali	GPS Ali Kach	Surplus Adjustment
73	Aqal Badshah	GPS Terwah Bera No.1	GPS Lukhari	Surplus Adjustment
74	Rafi Ullah	GPS Bada Sam	GPS Spinkai Killa	Surplus Adjustment
75	Azceem Ullah	GPS Bori Saghri	GPS Chorlaki No.1 S/Dara	Surplus Adjustment
76	Shahi Rehman	GPS Gulshah Khel	GPS Mehmandi	Surplus Adjustment
77	Tariq Mehmood	GPS Shakardara No.2	GPS Musal	Surplus Adjustment
78	Muhammad Aleem	GPS Shakardara No.2	GPS Gurgura	Surplus Adjustment
79	Akhar Zamin	GPS Singol	GPS Pakka Sharki	Surplus Adjustment
80	Shareef Ullah	GPS Dhand Saghri	GPS Cheshmi No.2	Surplus Adjustment
81	Muhammad Tahir	GPS Shakardara No.3	GPS Kiro Sam	Surplus Adjustment
82	Muhammad Tariq PSIT	GPS Chanda Fateh Khan	GPS Andoon Cheshmi	AVP in his own UC
84	Sajid Nizam PSIT	GPS Kiro Sam	GPS Mandoori No.2	AVP
84	Habib ur Rehman PSIT	GPS Sheikhano Banda	GPS Kiro Sam	AVP
85	Sami Ullah Shah PSIT	GPS Muslim Abad No.3	GPS Sumari Bala	As 02 PSITs in one school is against the policy
86	Ghayur Khan PSIT	GPS Ghulam Bandi	GPS Serki Togh Bala	As 02 PSITs in one school is against the policy
87	Zafar Iqbal PST	GPS Saleem Abad	GPS Chechani	NTS Appointee
88	Iqram Ullah PST	GPS Togh Bala	GPS Karigan	MPS converted into GP School
89	Muhammad Atique PSIT	GPS Serki Togh Bala	GPS Gandialy Payan	As 02 PSITs in one school is against the policy
90	Olas Khan PST	GPS Bamman	Muslim Abad No.2	Return to his original School
91	Syed Ali Afraz PST	GPS Gul Kana	GPS Sher Kot	NTS Appointee shifted to his original School
92	Syed Muhammad Sadiq	GPS Kizar Banda	GPS Sher Kot	NTS Appointee shifted to his original School
93	Muhammad Khalid PST	GPS Berh	GPS Jabbi	Return to his original School
94	Najeed Ullah Shah SPST	GPS Chekar Kot Bala	GPS Muhammad Zai	Return to his original School
95	Hadi Hussain PST	GPS Marai Bala No.1	GPS Urd Mitha Khan	NTS Appointee shifted to his original School
96	Shezad Mir PSIT	GPS Doctor Banda No.1	GPS Mir Asghar Mela No.1	As 02 PSITs in one school is against the policy
97	Khalid Ahmad SPST	GPS City Centre	GPS Aslam Abad	Return to his original School
98	Muhammad Afzal PST	GPS Sultan Abad	GPS Boraka	Return to his original School
99	Mehmood Iqbal SPST	GPS Malang Abad	GPS Boraka	Return to his original School
100	Rafiq ur Rehman	O/O DEO (M) Kohat	GPS Muslim Abad No.2	Temporary order cancelled
101	Khalid Khan	GPS MC Area No.2	GPS Baqi Zai No.3	W.C.T 01/09/2016 (Return from long leave)

PST at sno 81 was transferred back to Shakardara after 2 months of issue of transfer order.

No TA/DA is allowed.

Charge reports should be submitted to all concerned.

District Education Officer

Endst: No.6637-42/Rationalization/SDEOs (M)/Estab: (P)

Dated Kohat the 19th September 2016

Copy to the :-

- The Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- The District Nazim Kohat.
- The Deputy Commissioner Kohat.
- District Accounts Officer, Kohat.
- Hina Saeed Section Officer-I Chief Minister Secretariat Khyber Pakhtunkhwa Peshawar with reference to her Letter No. SO-1/CMS/CPK/3-1/2016 dated 20/07/2016.
- District Monitoring Officer IMU Kohat with reference to the decisions taken in the DSC meeting held on 12/08/2016 minutes circulated vide Letter No. 322/DMO/Kohat dated 15/08/2016 with the request to checked the arrival of the above Teachers of their new stations within 15 days and report about the defaulters if found any one.
- SDEO (Male) Kohat & Lachi with reference to their proposal letter No 569 dated 03/09/2016 and 1876 dated 03/09/2016. They are further directed to ensure compliance report of their respective Sub Division. In case of Non-Compliances, Disciplinary cases be submitted under E&D Rules 2011 to this office.
- All Head Teachers concerned.

19/9/2016

[Signature] 19/9/2016

Deputy District Education Officer



OFFICE OF THE DISTRICT EDUCATION OFFICER, (MALE) KOHAT

3

10/11/2016

ORDER

Consequent upon their recommendations by the Departmental Promotion Committee, and in pursuance of the Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department Notification No. SO(PE)/4-5/SSRC/Meeting / 2013/Teaching Cadre dated 24/07/2014, the following PST are hereby promoted/Posted to the post of Senior Primary School Teacher, BPS-14 (12720-980-42120) plus usual allowance as admissible under the rules on regular basis with immediate effect on the terms and conditions given below. They are posted in the Schools mentioned against their names:-

#	Seniority	Name of Official	Present place of Posting	School where posted	Remarks
68		Fazal ur Rehman	GPS Togh Bala No,1	GPS Ahmad Nager	AVP
69		Kamal Khan	GPS Togh Bala No,2	GPS Togh Bala No,1	AVP
70		Jamil Khan	GPS Billitang No.2	GPS Chaloo Ziarat	AVP
71		Murad Iqbal	GPS Mir Banda Jerma	GPS No.2 Summari	AVP
72		Sunab Gul	GPS ZSA Dad No.2	GPS Kandi Alaudin Khei	AVP
73		Gunn Jan	GPS Mandooni	GPS Gumbat No.1	AVP
74		Syed Imdad Shah	GPS Mero Zai	GPS Baqi Zai No.2	AVP
75		Quresh Khan	GPS MC Area No,1	GPS PAF Base	AVP
76		Qazi Marjan	GPS Shakardara No,1	GPS Spinnari	AVP
77		Muhammad Hanif	GPS Ali Kach	GPS Sher Ali Banda	AVP
78		Hafiz Khan	GPS Barati Banda	GPS Barati Banda	AVP
79		Rashid Ali	GPS Asghari Mela	GPS Landi Kachai No,1	AVP
80		Mutahi Shah	GPS Lal Mela	GPS Navey Killa	AVP
81		Muhammad Shoaib	GPS Baqi Zai No.3	GPS MC Area No.3	AVP
82		Muhammad Toufique	GPS Karigaran	GPS Gumbat-3	AVP
83		Abdul Abad	GPS Sheikhan Banda	GPS Inzer Wala	AVP
84		Muhammad Iqbal	GPS Dhall Bahzadi	GPS Dhall Beltzadi	AVP
85		Qureshi Azam	GPS Dhoda No.2	GPS Dheri Banda Dhoda	AVP
86		Qureshi Shakeri	GPS Dhoke Akbar Khan	GPS Dh:Akbar Shah	AVP
87		Muhammad Iqbal	GPS Sher Pan Colony	GPS Sher Pan Colony	AVP
88		Muhammad Zaman	GPS Lachi Markaz	GPS No.3 Lachi	AVP
89		Abdul Karim	GPS Gumbat No.2	GPS Siab	AVP
90		Syed Raif Shah	GPS Bazid Khel	GPS Ahmad Nager	AVP
91		Hafiz Muhammad Khan	GPS Spinkai Killa	GPS Mastan Abad	AVP
92		Muhammad Sarfaraz Khan	GPS Gumbat No.1	GPS Gandialy Bala	AVP
93		Abdul Halim Shah	GPS Gumbat No.2	GPS Dh:Alwara	AVP
94		Muhammad Saeed	GPS KTM Area	GPS Akbar Abad	AVP
95		Hafiz Ali	GPS Uster Zai Bala No,2	GPS Uster Zai Payan No,1	AVP
96		Sahib Bakhsh	GPS Malgin No,2	GPS Dagger Banda	AVP
97		Tarig Muhammad	GPS Shah Pur	GPS Sangher	AVP
98		Erar Hussain	GPS Gumbat No,1	GPS Gumbat No,2	AVP
99		Payanda Khan	GPS Nandraka	GPS Shakardara No.1	AVP
100		Muhammad Ilyas	GPS Uster Zai Bala No,2	GPS Musa Khel	AVP
101		Arshad Ali	GPS Sher Kot	GPS Kach Keena	AVP
102		Syed Muhammad Hussain	GPS MC Area No	GPS PAF Bazar	AVP
103		Syed Amir Hussain	GPS Spinalli Sam	GPS Kam Sam	AVP
104		Muhammad Ahmad	GPS City Centre	GPS Jangle Khel Gate	AVP
105		Sultan Khan	GPS Dhoke Said Dadshah	GPS Gandialy Parlan	AVP
106		Amir Khan	GPS Bori Sagari	GPS Shakardara No,3	AVP
107		Imdad Shah	GPS Jalal Abad (Mandouri)	GPS Dhari Banda Dhoda	AVP
108		Muhammad I Khan	GPS Sur Gul No.	GPS PAF Base	AVP
109		Abdul Qadir	GPS Kohi Killa	GPS SpinaKhawra	AVP
110		Muhammad Iqbal	GPS Dheri Banda Kohat	GPS Dheri Banda Kohat	AVP
111		Muhammad Iqbal	GPS Naway Killa	GPS MC Area No 1	AVP
112		Muhammad Iqbal	GPS Ambar Banda No,1	GPS Kaghazai	AVP
113		Muhammad Ali	GPS Esa Khel No.	GPS Mir Asghar Mela No,1	AVP

The appellant Mr. Shahid Anwar belongs to Shakardara Urban. The PST at SNO 32 & 39 belong Shakardara Rural & posted in S. Dana Urban.

﴿ چارج رپورٹ ﴾

مورخہ 19 / 09 / 2016

بیطابق آرڈر نمبر 6637-42

آمدہ از دفتر ڈسٹرکٹ ایجوکیشن آفیسر (مردانہ) کوہاٹ

جی پی ایس سلیم آباد سے جی پی ایس کیرٹروسام کوہاٹ کے حکم کے مطابق

مشاہدہ انور نے آج مورخہ 22 / 09 / 2016 کو جی پی ایس

کیرٹروسام میں قبل ابعاد از دوپہرا پنے عہدے کا چارج سنبھال لیا ہے۔ چارج رپورٹ ارسال خدمت ہے۔

Amway

22/09/2016

دستخط چارج گزرنے والا

Handwritten signature

22/9/16

دستخط چارج دہندہ

P.S.M.T
GPS KIRROSAM
KOHAT

خط و کتابت نمبر 405 مورخہ 22 / 09 / 2016

فارغ خطی

بمطابق حکم نمبر 42-6637 مورخہ 2016-09-19 آئندہ

از دفتر ڈسٹرکٹ ایجوکیشن آفیسر (مردانہ) کوہاٹ

مشاہدہ انور سنٹر پی ایس ٹی کا تبادلہ جی پی ایس سلیم آباد

سے جی پی ایس کسیر ٹرومنہا کو سوچا گیا ہے۔ حکم کے مطابق

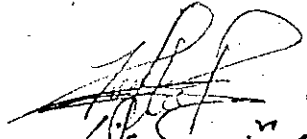
مشاہدہ انور سے سکول ہذا کا مکمل چارج لیکر اسے

آج مورخہ 2016-09-21 کو بعد از دوپہر سکول ہذا

سے فارغ کیا جاتا ہے اور اسے ہدایت کی جاتی ہے

کہ جلد از جلد اپنے متعلقہ سکول میں اپنے عہدے کا

چارج سنبھالے۔


دستخط فارغ کنندہ



Head Master
G.P.S Saleem Abad
Kohat

دستخط چارج دہندہ

مورخہ 2016-09-21

خط و کتابت نمبر 062