

07.08.2017

No one is present on behalf of the appellant and Mr. Muhammad Zubair, District Attorney for respondents present. Notices be issued to appellant/his counsel. To come up for arguments on 9.11.2017 before the DB at camp court, Swat.


Member


Chairman
Camp court, Swat

09.11.2017

None present for the appellant. On previous date also none was present on his behalf. Addl, AG alongwith Bashir Ahmad, Headmaster for the respondents present. ~~appellant and Mian Amir Qadir, District Attorney, Swat~~

In view of the above, the appeal is dismissed for want of prosecution.


Member


Chairman
Camp Court, Swat


ANNOUNCED
09.11.2017

N/A

1276/15

05.09.2016

None present for the appellant present. Mr. Gul Muhammad, CT alongwith Mr. Muihammad Zubair, Sr.GP for the respondents present. Due to strike of the bar, case adjourned for rejoinder and final hearing before the D.B to 06.12..2016 at camp court, Swat.




Member



Chairman
Camp Court, Swat.

06.12.2016

None present for the appellant. Mr. Raees Khan, ADO alongwith Mr. Muhammad Zubair, Sr.GP for the respondents present. The bench is incomplete. To come up for rejoinder and final hearing on 03.04.2017 before D.B at camp court, Swat.




Chairman
Camp court, Swat.

03.04.2017

Clerk of the counsel for appellant present. Mr. Bashir Ahmed, Headmaster alongwith Mr. Muhammad Zubair, Senior Government Pleader for respondents also present. Clerk of the counsel for appellant requested for adjournment. Adjourned. To come up for rejoinder and arguments on 07.08.2017 before D.B at Camp Court Swat.



(AHMAD HASSAN)
MEMBER



(MUHAMMAD AMIN KHAN KUNDI)
MEMBER
Camp Court Swat.

Appellant Deposited
Security & Process Fee

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 14.01.2016 before S.B at Camp Court Swat. Notice of application be also issued for the date fixed.


Chairman
Camp Court Swat

14.01.2016

None present for appellant. Mr. Bashir Ahmed, Headmaster alongwith Mr. Muhammad Zubair, Sr. GP for official respondents present. Requested for adjournment. To come up for written reply/comments before S.B on 6.4.2016 at Camp Court Swat.


Chairman
Camp Court Swat

06.04.2015 Appellant in person and Bashir Ahmad, Headmaster alongwith Sr.GP for the respondents present. Written statement submitted by the respondents. None present for private respondent No. 5 hence proceeded against ex-parte. The appeal is assigned to D.B for rejoinder and final hearing for 05.09.2016 at camp court, Swat.


Chairman
Camp Court Swat

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. 1276/2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	
1	13.11.2015	<p>The appeal of Mr. Shabir Ahmad presented today by Mr. Zia-ur-Rehman Advocate may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"><i>[Signature]</i> REGISTRAR</p> <p>This case is entrusted to Touring Bench Swat for preliminary hearing to be put up thereon <u>7-12-15</u></p> <p style="text-align: right;"><i>[Signature]</i> CHAIRMAN</p>
3	7.12.2015	<p>Counsel for the appellant present.</p> <p>Learned counsel for the appellant argued that the appellant was serving as SST and was transferred from GHS Kharakai Dargai to GHS No.1 Sakhaket vide transfer order dated 3.7.2015 and after lapse of a period of one month he was retransferred from the said school i.e. GHS No.1 Sakhaket to GHS Kharakai Dargai where against he preferred departmental appeal on 7.8.2015 which was not responded and hence the instant service appeal on 13.11.2015.</p> <p>That the impugned transfer order is pre-mature and passed despite security concerns of the appellant.</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE

TRIBUNAL, PESHAWAR

Service Appeal No. 1276 /2015

Shabir AhmedAppellant

VERSUS


Govt. of KPK through ~~Chief~~ Secretary, Elementary &
Secondary Education and others.....Respondents

INDEX

S.No.	Description of documents.	Annexure	Dated
1.	Memo of appeal with affidavit.		1-5
2.	Copy of Notification	A	6-9
3.	Copy of Transfer order 02.03.2013	B	10
4.	Copy of Transfer order 03.07.2015	C	11
5.	Copy of relieving chit	D	12
6.	Copy of certificate of transfer of charge dated 04.07.2015	E	13
7.	Copy of Office order dated 06.07.2015	F	14
8.	Copy of Transfer order dated 22.07.2015	G	15
9.	Copy of application for cancellation of order	H	16
10.	Copy of application for cancellation of order	I	17
11.	Copy of Letter dated 08.09.2015	J	18
12.	Copy of application for cancellation of order	K	19
13.	Wakallatnama		20


Appellant

Through


Zia-ur-Rehman
Advocate High Court
At Malakand

(1)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

Service Appeal No. 1976 /2015

N.W.F. Province
Service Tribunal
Diary No. 1354
Dated 13-11-2015

Shabir Ahmed S/o Ali Ahmad
R/o Village Sarogai P.O Meherdai
Tehsil Dargai District Malakand.....Appellant

VERSUS

- 1) Govt. of KPK through ~~Secretary~~ Secretary, Elementary & Secondary Education, Peshawar.
- 2) Director Elementary & Secondary Education, Peshawar.
- 3) District Education Officer (male) District Malakand.
- 4) Deputy Commissioner, District Malakand.
- 5) Mr. Umar Baz S.S.T (Bio), GHS Skhakot at Malakand
.....Respondents

Ex-Parte
6.9.16

Appeal u/s 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974, against the orders dated 06.08.2015, whereby the transfer order of the appellant dated 03.07.2015 was cancelled and the appellant has been directed by the respondents to resume his duty at old station i.e. Government High School No.1 Kharakai

PRAYER IN APPEAL

On acceptance of instant appeal the impugned transfer/ cancellation orders dated 06.08.2015 may be set-aside and

respondents may be directed to remain the appellant on his own position i.e. GHS No.1 Skhakot.

Respectfully Sheweth:-

Brief facts giving rise to instant appeal are as under:-

- 1) That the appellant is the bonafide resident of District Malakand.
- 2) That the appellant was appointed in education department on 11.11.2011. (Copy of appointment order is attached)
- 3) That the respondents transferred the appellant against a vacant post of SST (Sc Pre-medical) at GHS Kharakai on this own pay and BPS scale. (Copy of the order dated 02.03.2013 is attached)
- 4) That the appellant was transferred to GHS No.1 Skhakot from GHS Kharakai vide order dated 03.07.2015. (Copies of the orders dated 03.07.2015 and relieving slip etc are attached)
- 5) That the respondent No.3 vide his order dated 06.08.2015 cancelled the earlier order at 03.07.2015 (from one Union Council to another) and declared the appellant to resume his duty at old station i.e GHS Kharakai.
- 6) That the appellant has submitted application against the above mentioned transfer orders, which have not been

replied yet by respondents. (Copy of the application is attached)

7) That the appellant aggrieved with the cancellation/ transfer orders dated 06.08.2015 filed this appeal on the following grounds amongst others:-

GROUND.

- A. That the impugned transfer order dated 06.08.2015 is illegal, unjustified, against the Government Policy, vide-ab-initio and based on malafide on the part of respondents.
- B. That the appellant is the permanent resident of District Malakand and he is rendering his services without any complaint since 2011, therefore, his transfer order is ineffective upon his rights.
- C. That the transfer orders have been made politically and the manner adopted by the respondents was pick and choose.
- D. That the appellant has security problems and application regarding the security has been submitted with competent authorities. (Copy of application is attached)
- E. That the Head Teacher of the concern School requested the competent authority regarding the transfer of the appellant. (Copy of application is attached)
- F. That the appellant has been discriminated, which is violation of the provision of the constitution of Islamic Republic of Pakistan, 1973, under Article 25.


(4)

G. That the act of respondents is clear violation of fundamental rights, which are guaranteed by the Constitution of Pakistan, 1973, therefore, the impugned transfer order, needs interference.

It is, therefore, mostly humbly prayed that, on acceptance of instant appeal the order dated 06.08.2015 may be set-aside and respondents may be directed to remain the appellant on his own position i.e. GHS Skhakot.



Appellant

Through


Zia-ur-Rehman
Advocate High Court
At Malakand

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


Service Appeal No. _____/2015

 Shabir AhmedAppellant

VERSUS

Govt. of KPK through Chief Secretary, Elementary &
Secondary Education and others.....Respondents

AFFIDAVIT

I,  Shabir Ahmed S/o Ali Ahmad R/o Village Sarogai
P.O Meherdai Tehsil Dargai District Malakand do hereby
affirm and declare on oath that the contents of the appeal are
true and correct to the best of my knowledge and belief and
nothing material has been concealed from this hon'ble
Tribunal.

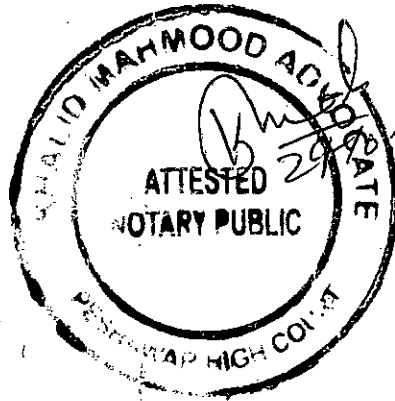


Deponent

Identified by



Zia-ur-Rehman
Advocate High Court
At Malakand





A
Annexure (A)
6

Directorate of Elementary and Secondary Education

Khyber Pakhtunkhwa Provincial Government

PHONE: 091-9210389, 9210338,

9210437, 9210957, 9210368

Fax: 091-9210936

E-mail desekpr@yahoo.com

Notification.

S-No (81)

Consequent upon the recommendation of the Khyber Pakhtunkhwa Public Service Commission, appointment of the following candidates is hereby ordered against the post of Secondary School Teacher (SST Sc) in BPS-16 (Rs.10000-800-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with immediate effect and further posted in the school noted against each:-

SNO	Name	Father name	Domicile District	Zone	Permanent Address	Place of Posting	Remarks
1	Inam Ullah	Mukaram Khan	Charassada	II	Vill: Ochawala P/O Shabqadar Tehsil & Distt: Charsadda	GHS Manikhela Charassada	A.V.I
2	Shakeel Ahmad Khan	Abdur Rashid Khan	Charsadda	II	Distt: Charsadda Tehsil Shabqadar P/O Haji Zai, Vill: Mahmood Abad Vic: Shabqadar Fort	GHSS Dhaki Charsadda	A.V.I
3	Muhammad Adnan	Muhammad Numan	Charsadda	II	Moh: Mirozai (Hajyan) Vill: & P/O Turangzai Tehsil & Distt: Charsadda	GHSS Nisatta Charsadda	A.V.I
4	Zahir Shah	Gulab Khan	Charsadda	II	Vill: Sewan P/O Shukoor Tehsil Tangi Distt: Charsadda	GHS Katoozai Charsadda	A.V.I
5	Hazrat Mumir	Roshan Mumir	Charsadda	II	Distt: Charsadda Tehsil Shabqadar Vic: Mahzara P/O Haji Zai Moh: Payyan	GHS Buttagram Charsadda	A.V.I
6	Ilyas	Faqir Muhammad	Charsadda	II	Vill: Kagan P/O Mandani Tehsil & Distt: Charsadda	GHS Dalazak Charsadda	A.V.I
7	Irshad Ali	Umar Shah	Charsadda	II	Vill: Dado Kalli P/O & Tehsil Tangi Distt: Charsadda	GHS Mera Gul Abad Charsadda	A.V.I
8	Ishfaq Ahmad	Muhammad Zurif Khan	Charsadda	II	Vill: Passand Kali P/O Shakh No.6 Tehsil Tangi Distt: Charsadda	GHSS Daragai Charsadda	A.V.I
9	Jamil Ahmad	Fazli Raziq	Charsadda	II	Vill: P/O & Tehsil Tangi Moh: Nusrani (Bachayga) Distt: Charsadda	GHS Shaker Dhand Charsadda	A.V.I
10	Kifayat Shah	Muhammad Shah	Charsadda	II	Moh: Hafiz Abad Guibahar No.2 Mardon Road, Tehsil & Distt: Charsadda	GHS Turand Charsadda	A.V.I
	Muhammad Ajmal Hassan	Awal Mir	Charsadda	II	Vill: Framy Shahweh Bozar Tehsil & Distt: Charsadda	GHS Khait Kili Charsadda	A.V.I
12	Muhammad Zaheen Ullah	Haji Haleem Ullah	Charsadda	II	Vill: Sandarar P/O Shabqadar (Fort) Distt: Charsadda	GHS Anjra Charsadda	A.V.I

TRUE COPY

71	Muhammad Ismail	Muhammad Hussain	Dir	III	Distt: & Tehsil Dir P/O Gamseer Vill: Sia Jabbar	GHS Kalkot Dir Upper	A.V.P
72	Nisar Ahmad Khan	Muhammad Qadar Khan	Dir Lower	III	Vill: Kambat Tehsil & P/O Samar Bagh Distt: Dir Lower	GHS Samar Bagh Dir Lower	A.V.P
73	Saeed ur Rahman	Mustaqim Shah	Dir Lower	III	Vill: Dehrai, Tehsil Balambat P/O Timergara Distt: Dir Lower C/O Islamic Book Depot	GHS Haji Abad Dir Lower	A.V.P
74	Zia ud Din	Hamid ul Haq	Dir Lower	III	Vill: Kakas P/O Maskini Tehsil Samar Bagh Dir Lower	GHS Maskinat Dir Lower	A.V.P
75	Zia Ullah	Ghulam Nabi	Dir Lower	III	Vill: Pukthawergia P/O Lajbouk Tehsil Balambat Dir Lower	GHS Lajbooki Dir Lower	A.V.P
76	Iqbal Hussain	Rehmat Said	Malakand	III	Vill: & P/O Matkani Tehsil Batkhela Distt: Malakand	GHS Pangal Dir Lower	A.V.P
77	Muhammad Ayub	Gul Sher	Malakand	III	Vill: & P/O Thana Malakand Moh: Shaheedan	GHS Ghazikot Bunner	A.V.P
78	Muhammad Israr	Sher Zada	Malakand	III	Vill: & P/O Totai Distt: Malakand Tehsil Swat Ranizai	GHS Katkala Bunner	A.V.P
79	Naik Bahadar	Shah Bahadar	Malakand	III	Vill: Haryankot Tehsil Dargai Distt: Malakand	GHS Dakara Bunner	A.V.P
80	Riaz Ali Khan	Feroz Shah	Malakand	III	Vill: Alam Gunj P/O Qasim Tehsil & Distt: Mardan	GHS Cheena Bunner	A.V.P
81	Shabir Ahmad	Ali Ahmad	Malakand	III	Vill: Sarogai P/O Meherdai Tehsil Dargai Malakand	GHS Dagger No.2 Bunner	A.V.P
82	Umar Zaman	Bad Shah Rahman	Malakand	III	Vill: Badama P/O Sellai Pattay Tehsil Batkhela Distt: Malakand	GHS Batara Bunner	A.V.P
83	Wajid Ali Khan	Muhammad Saeed	Malakand	III	Vill: & P/O Agra Moh: Gunbad Tehsil Batkhela Distt: Malakand	GHS Khararai Bunner	A.V.P
84	Zahid Muhammad	Haji Muhammad	Malakand	III	Vill: & P/O Mekhband Distt: Malakand	GHS Charori Bunner	A.V.P
85	Anwar Saeed	Mehraban Shah	Swabi Gadoon	III	Vill: Bada (Gadoon) P/O Kabgani Tehsil & Distt: Swabi	GHS Dalori Swabi Gadoon	A.V.P
86	Anwar Ali	Qalandar	Swat	III	Vill: Qambar P/O Rahim Abad Tehsil Babozai Moh: Usman Khal Swat	GHS Kedam Swat	A.V.P
87	Fazal Hussain	Sahib Zada	Swat	III	Vill: & P/O Kokarai Tehsil Babozai Distt: Swat	GHS Tarogay Swat	A.V.P
88	Habib Ullah	Muhammad Bahim	Swat	III	Vill: Tangar P/O Labat Tehsil Malta Distt: Swat	GHS Labat Swat	A.V.P
89	Haider Ali	Alim Jan	Swat	III	Moh: Rahmat Abad, Vill: & P/O Gogdara Distt: Swat	GHS Oalagay Swat	A.V.P
90	Hashmat Ali	Sham Mian	Swat	III	Vill: & P/O Chamtalori	GHS Chamtalori	A.V.P

71	Muhammad Ismail	Muhammad Hussain	Dir	III	Distt: & Tehsil Dir P/O Gamseer Vill: Sia Jabbar	GHS Kalkot Dir Upper	A.V.P
72	Nisar Ahmad Khan	Muhammad Qadar Khan	Dir Lower	III	Vill: Kambat Tehsil & P/O Samar Bagh Distt: Dir Lower	GHSS Samar Bagh Dir Lower	A.V.P
73	Saeed ur Rahman	Mustaqim Shah	Dir Lower	III	Vill: Dehrai, Tehsil Balambat P/O Timergara Distt: Dir Lower C/O Islamic Book Depot	GHS Haji Abad Dir Lower	A.V.P
74	Zia ud Din	Hamid ul Haq	Dir Lower	III	Vill: Kakas P/O Maskini Tehsil Samar Bagh Dir Lower	GHS Maskini Dir Lower	A.V.P
75	Zia Ullah	Ghulam Nabi	Dir Lower	III	Vill: Pukhawergia P/O Lajboui Tehsil Balambat Dir Lower	GHS Lajboui Dir Lower	A.V.P
76	Iqbal Hussain	Rehmat Said	Malakand	III	Vill: & P/O Matkani Tehsil Batkhela Distt: Malakand	GHS Pangal Dir Lower	A.V.P
77	Muhammad Ayub	Gul Sher	Malakand	III	Vill: & P/O Thano Malakand Moh: Shaheedan	GHSS Ghazikot Bunner	A.V.P
78	Muhammad Israr	Sher Zada	Malakand	III	Vill: & P/O Totai Distt: Malakand Tehsil Swat Ranizai	GHS Kalkala Bunner	A.V.P
79	Naik Bahadar	Shah Bahadar	Malakand	III	Vill: Haryankot Tehsil Dargai Distt: Malakand	GHS Dakara Bunner	A.V.P
80	Riaz Ali Khan	Feroz Shah	Malakand	III	Vill: Alam Gunj P/O Qasim Tehsil & Distt: Mardan	GHS Cheena Bunner	A.V.P
81	Shabir Ahmad	Ali Ahmad	Malakand	III	Vill: Sarogai P/O Meherdai Tehsil Dargai Malakand	GHS Dagger No.2 Bunner	A.V.P
82	Umar Zaman	Bad Shah Rahman	Malakand	III	Vill: Badama P/O Sellai Pattay Tehsil Batkhela Distt: Malakand	GHSS Batara Bunner	A.V.P
83	Wajid Ali Khan	Muhammad Saeed	Malakand	III	Vill: & P/O Agra Moh: Gumbad Tehsil Batkhela Distt: Malakand	GHS Khararai Bunner	A.V.P
84	Zahid Muhammad	Haji Muhammad	Malakand	III	Vill: & P/O Mekhband Distt: Malakand	GHS Charori Bunner	A.V.P
85	Anwar Saeed	Mehraban Shah	Swabi Gadoon	III	Vill: Bada (Gadoon) P/O Kabgani Tehsil Distt: Swabi	GHS Dalori Swabi Gadoon	A.V.P
86	Anwar Ali	Qalandar	Swat	III	Vill: Qambar P/O Rahim Abad Tehsil Babozai Moh: Usman Khail Swat	GHS Kedam Swat	A.V.P
87	Fazal Hussain	Sahib Zada	Swat	III	Vill: & P/O Kokarai Tehsil Babozai Distt: Swat	GHS Tarogay Swat	A.V.P
88	Habib Ullah	Muhammad Rahim	Swat	III	Vill: Tangar P/O Labat Tehsil Matta Distt: Swat	GHS Labat Swat	A.V.P
89	Haider Ali	Alim Jan	Swat	III	Moh: Rahmat Abad, Vill: & P/O Gogdara Distt: Swat	GHS Oalagay Swat	A.V.P
90	Hashmat Ali	Sham Mian	Swat	III	Vill: & P/O Chamtala Tehsil Khwaza Khela Distt: Swat	GHSS Jano Swat	A.V.P

TRUE COPY

ef
H

130	Noor ul. Islam	Rajan Shah	Lakki Marwat	IV	Vill: & P/O Meli Nandra Khel Lakki Marwat	GHS Tap Takhti Khel Lakki Marwat	A.V.P
131	Pervez Khan	Abdur Rahman	Lakki Marwat	IV	Vill: & P/O Gani Khan Khel Lakki Marwat	GHS Landiwa Lakki Marwat	A.V.P
132	Tanveer Ali	Amir Nawaz	Lakki Marwat	IV	Moh: Saeed -Al- Khel Vill: & P/O Dulla Khel Lakki Marwat	GHS Khuwaja Khel Lakki Marwat	A.V.P
133	Tariq Hameed	Abdul Hameed	Lakki Marwat	IV	Vill: Kotka Lali P/O Sarai Gambila Tehsil Serai Nourang Distt: Lakki Marwat	GHS No.2 Tajori Lakki Marwat	A.V.P
134	Umar Jan	Muhammad Hassan Khan	Lakki Marwat	IV	Distt: Lakki Marwat Tehsil Naurang P/O Gambila Vill: Kotka Mehmood	GHS Wanda Shab Khel Lakki Marwat	A.V.P
135	Binyamin Khan	Umar Khan	Tank	IV	Vill: Mamraiz Fathan Tehsil & Distt: Tank	GHS Garah Shabbaz Tank	A.V.P
136	Nida Ali	Sradar Ali	Tank	IV	Vill: & P/O Gulistan Tehsil & Distt: Tank	GCMHS No.3 Tank	A.V.P
137	Muhammad Nawaz	Muhammad Miskeen	Abbottabad	V	Vill: Lailgah P/O Muslim Abad Distt: Abbottabad	GHS No.1 Abbottabad	A.V.P
138	Fawad Hussain	Fakhar Hussain	Haripur	V	H/No. 242 Moh: Jadedd Khoo, Tehsil & Distt: Haripur	GHS Bhera Haripur	A.V.P
139	Imran Khan	Nazir Ahmad	Haripur	V	Moh: Rajgan # Near Mobilink Tower Plot # 28-B Phase# 1 PC#22650 Khanpur Distt: Haripur	GHS Choi Haripur	A.V.P
140	Muhammad Imran	Ali Mardan	Haripur	V	Moh: Mara Near Poly Technical Colleg. Vill: & P/O Sarai Saleh Tehsil & Distt: Haripur	GHS Najaf Pur Haripur	A.V.P
141	Muhammad Qaiser Khan	Misal Khan	Haripur	V	H/No. 2 Officer Colony Khyber Textile Mills, Baldher Distt: Haripur	GHS Panian Haripur	A.V.P
142	Nisar Ahmad	Muhammad Ashraf	Haripur	V	Moh: Swatian Val: Sikanderpur Distt: Haripur	GHS Noor Pur Haripur	A.V.P
143	Khurshid Ahmad	Muhammad Daud Fayyaz	Manshra	V	Vill: & P/O Bahaj Distt: Manshra Qalender Abad	GHS Jal Gali Haripur	A.V.P

Terms and conditions:-

- 1 His services will be considered regular but without Pension & Gratuity in terms of Section-19 of the NWFP Civil Servant Act, 1973 as amended vide NWFP Civil Servants (Amendment) Act, 2005. He will however be entitled to Contributory Provident Fund in such a manner and at such rates as per prescribed by the Govt.
- 2 In case, he is already in Government: service and working against pensionable post on regular basis before 1st day of July 2001, without any service break, on application to Khyber Pakhtunkhwa Public Service Commission through proper channel and selection by the Commission, is appointed and allowed choice of option either to retain benefit of pension & gratuity as allowed to him under his

9

previous terms of appointment or to avail the benefit of Contributory Provident Fund allowed to him under new appointment.

- 3 His services are liable to termination on one month's notice from either side. In case of resignation without notice his one-month pay/allowances shall be forfeited to the Government.
- 4 He should join his post within 30 days of the issuance of this notification. In case of failure to join their post within one month of the issuance of this notification, his appointment will expire automatically and no subsequent appeal etc shall be entertained.
- 5 He would be on probation for a period of one year extendable for another one year.
- 6 He will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 7 His services 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.
- 8 Charge report should be submitted to all concerned.
- 9 The EDOs concerned would furnish a certificate to the effect that the candidate has joined the post or otherwise after one month of the issue of his posting orders.
- 10 The EDOs concerned will verify their documents before release of pay.
- 11 His seniority will be maintained as determined by the Khyber Pakhtunkhwa Public Service Commission.
- 12 No TA/DA will be allowed to the appointee for joining his duty.

(Muhammad Rafiq Khatrak)
Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

Endst: No. 778-923/ File No.2/A-14/SST/PSC/Apptt: Dated Peshawar the 11/11/2011

Copy forwarded for information and necessary action to the:

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Secretary Khyber Pakhtunkhwa Public Service Commission Peshawar.
3. Executive District Officer (E&SE) Concerned
4. District Accounts Officer Concerned
5. Official Concerned.
6. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
7. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar
8. M/File

TRUE COPY

Dy: Director (Estab)
Elementary and Secondary Education

11/22/11
11/11/2011

Annexure
B (B)

10

OFFICE OF THE DISTRICT EDUCATION OFFICER 9MO MALAKAND AT BATKHELA.

TRANSFER ORDER.

Consequent upon the approval of the Director E&SE Khyber pakhtunkhwa Peshawar vide his Memo No.134/File No.33/SET(M) dated 01.03.2013, Mr.Shabir Ahmad, SST (Sc:Pre: Medical) GHS Palai is hereby transferred against the vacant post of SST (Sc:Pre:Medical) at GHS Kharki on his own pay and B P Scale in the interest of public service from the date of his taking over charge.

Note:-

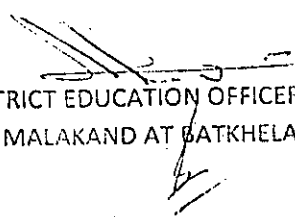
1. No TA/DA is allowed.
2. Charge reports should be submitted to all concerned.

(MUSHTAQ AHMAD)
DISTRICT EDUCATION OFFICER(M),
MALAKAND AT BATKHELA.

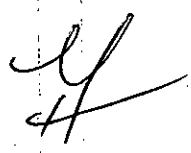
Endst No 2993-96 /A-12/G.Transfer of SST(M) Dated Batkhela the 2-03 /2013.

Copy of the above is forwarded for information to:-

1. The Director E&SE Khyber pakhtunkhwa Peshawar.
- 2-3 The Hed Masters concerned.
4. The District Accounts Officer Malakand.


DISTRICT EDUCATION OFFICER
(M) MALAKAND AT BATKHELA.

TRUE COPY



(11)

Annexure C

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) MALAKAND AT BATKHELA.

TRANSFER ORDER.

The following SSTs (Bio: & Chem: ,Phy: & Maths and (General) are hereby transferred/adjustment to Schools noted against each on their own pay and Scale in the interest of public service from the date of their taking over charge.

Sr No.	Name & Designation	From	To	Remarks
1	Mr. Hamid Khan SST (Phy: Maths)	GHS Bazdara Payeen	GHSS Ghani Dheri	N.C.P
2	Mr. Amjad Ali SST (Phy: Maths)	GHSPalai	GHS No1 Sakhakot	N.C.P
3	Mr. Sawab Gul SST (Phy: Maths)	GHSS Kot	GHS No1 Dargai	N.C.P
4	Mr. Shabir Ahmad SST (Bio: Chem:)	GHS Kharki	GHS No 1 Sakhakot	N.C.P
5	Mr. Hassan Khan (Bio: Chem:)	GHS Wartair	GHS N01 Dargai	N.C.P
6	Mr. Asghar Ali SST (G)	GHS Kharki	GHS No1 Dargai	N.C.P
7	Mr. Akhtar Rasool SST (G)	GHS No1 Thana	GHS Kharki	V.S.No6
8	Mr. Abdul Raouf SST (G)	GHS Nal	GCMHS Batkela	N.C.P
9	Mr. Abbas Qayum SST (G)	GHS Khanorai	GHSS Kot	N.C.P
10	Mr. Wali Khan SST (G)	GHS Bazdara Payeen	GHS No1 Sakhakot	N.C.P
11	Mr. Muhammad Nabi SST (G)	GHS Jalala	GHSS Ghani Dheri	N.C.P
12	Mr. Akram Shah SST (Bio&Chem:)	GHS Haryankot	GHSS Ghani Dheri	N.C.P

- 1. TA/DA is allowed.
- 2. Charge reports should be submitted to all concerned.

(SYED MANZARJAN SAJID)
DISTRICT EDUCATION OFFICER (M),
MALAKAND AT BATKHELA.

Ends No. 4451-4475 /A-12/G. Transfer of SST(M) Dated Batkhela the 3/7 /2015.

Copy of the above is forwarded for information to:-

- 1. The Director E&SE Khyber pakhtunkhwa Peshawar.
- 2. The District Accounts Officer Malakand.
- 3. The Principals/ Head Masters concerned, District Malakand.
- 4. The Candidate concerned.

(Handwritten signature)

DISTRICT EDUCATION OFFICER
(M) MALAKAND AT BATKHELA

TRUE COPY

(Handwritten signature)

(Handwritten mark)

**OFFICE OF THE DISTRICT EDUCATION OFFICER (M) MALAKAND AT
BATKHELA**

TRANSFER ORDER:

The following SSTs (Bi: & Chem: Phy: & Maths and (General) are hereby transferred/adjustment to Schools noted against each on their own pay and scale in the interest of public service from the date of their taking over charge.

Sr.No.	Name & Designation	From	To	Remarks
1.	Mr. Hamin Khan SST (Phy: Maths)	GHS Bazdara Payeen	GHSS Ghani Dheri	NCP
2.	Mr. Amjad Ali SST (Phy: Maths)	GHS Palai	GHS No.1 Sakhakot	NCP
3.	Mr. Sawab Gul SST (Phy: Maths)	GHSS Kot	GHS No.Dargai	NCP
4.	Mr. Shabir Ahmad SST (Bio: Chem)	GHS Kharki	GHS No.1 Sakhakot	NCP
5.	Mr. Hassan Khan (Bio: Chem:)	GHS Wartair	GHS NO.1 Dargai	NCP
6.	Mr. Asghar Ali SST (G)	GHS Kharki	GHS No.1 Dargai	NCP
7.	Mr. Akhtar Rasool SST (G)	GHS No.1 Thana	GHS Kharki	NCP
8.	Mr. Abdur Raof SST (G)	GHS Nal	GCMHS Batkheela	NCP
9.	Mr. Abbas Qayum SST (G)	GHS Khanorai	GHSS Kot	NCP
10.	Mr. Wali Khan SST (G)	GHS Bazdara Payeen	GHS No.1 Sakhatkot	NCP
11.	Mr. Muhammad Nabi SST (G)	GHS Jalala	GHSS Ghani Dheri	NCP
12.	Mr. Akram Shah SST (Bio & Chem:)	GHS Haryankoat	GHSS Ghani Dheri	NCP

1. No TA/DA is allowed
2. Charge reports should be submitted to all concerned

Sd/-
(Syed Manzarjan Sajid)
District Education Officer (M),
Malakand at Batkhela.

Endst No.4451-4475/A-12/G. Transfer of SST(M) dated Batkhela the 3/7/2015.

Copy of the above is forwarded for information to:-

1. The Director E&SE Khyber Pakhtunkhwa, Peshawar
2. The District Accounts Officer, Malakand
3. The Principals/Head Masters concerned, District Malakand
4. The Candidate concerned

TRUE COPY

[Handwritten Signature]

Sd/-
District Education Officer (M),
Malakand at Batkhela

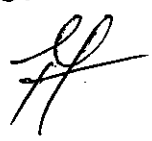
10 (12) Amx(D)

RELIEVING CHIT.

Reference to The D.EO (E&SE) Malakand at Bakhela Endst No. 4451-75/A-12/G. Dated 03-07-2015, Mr. Shabir Ahmad SST (Sci) of this school is hereby relieved of his duty to day on AN due to his Transfer to SST post at GHS No. 1 Skhakot.


**Head Master
G.H.S KHARKAI
DISTT: MALAKAND**

TRUE COPY



Annexure
E

5 (13)

CERTIFICATE OF TRANSFER OF CHARGE.

Certified that we have on the fore/after noon of this day on 03-07-15 (AN)
Respectively made over and received charge of the Office of the SST (G) post at this Station
at GHS NO.1 Dargai transferred order issued by the DEO (E&S) Edu: Malakand at
Batkhela Endst: NO. 4451-75/A-12/G. Dated 03-07-15

Particulars of each and important secret and confidential documents handed over and
noted on the reverse.

Signature of relieved _____
Govt: servant with Post & Name:
VACANT

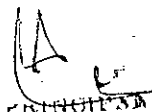
Signature of relieving _____
Govt: servant with Post & Name
Shabir Ahmad SST

Endst: NO. 159

Dated GHS No.1 ^{Skhakot} ~~Dargai~~ the 04 /07/2015

Submitted for information and further necessary action to

- 1 The District Education Officer (E&S Edu:) Malakand at Batkhela.
- 1 The Agency Accounts Officer Malakand.


Govt. High School B...
Batkhot M...
Batkhot M...

TRUE COPY



14

Annexure
E

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) MALAKAND AT BATKHELA.

OFFICE ORDER.

Transfer order issued vide this office Endst No 4451-75 dated 3/7/2015, Endst No 4643-49 dated 22.7.2015, Endst: No4650-56 dated 22.7.2015, Endst No 4661-64 dated 23.7.2015, and Endst No 4924-29 dated 27.7.2015 are hereby directed to resume their duty at old station till the arrival of their substitute.

(SYED MANZAR JAN SAJID)
DISTRICT EDUCATION OFFICER
(M) MALAKAND AT BATKHELA.

Endst No 5371-77 JA-12/G. Transfer of SST (M) Dated Batkhela the 06/07/2015

Copy of the above is forwarded for information to :-

1. The Director E&SE Khyber Pakhtunkhwa Peshawar.
2. All Principals/Head Master GHS Wartair, Kharki, Palai, B/Payeen, H/Kot, Malakand, Jalalkot, Nai, Zalamkot, Thana No1, Matkani, Makhband, Jalala, Haibatgram and Khanorai Distt: Malakand for strict compliance.

TRUE COPY

[Handwritten signature]

[Handwritten signature]
DISTRICT EDUCATION OFFICER
(M) MALAKAND AT BATKHELA.

Annexure
15 "G"

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) MALAKAND AT BATKHELA:

TRANSFER ORDER.

The following SSTs (Bio: & Chem: ,Phy: & Maths) are hereby transferred/Adjustment to Schools noted against each on their own pay and Scale in the interest of public service from the date of their taking over charge.

S.No	Name & Designation	From	To	Remarks
1	Mr. Umar Baz SST (Bio& Chem:)	GHS Malakand	GHS Kharkai	A.V.P
2	✓ Mr.Noor Muhammad SST (Bio:& Chem:)	GHS Matkani	GHS Haryankot	A.V.P
3	Mr. Bakht Rawan SST (Phy: Maths)	GHS Matkani	GHS Malakand	A.V.P

Note:-

1. No TA/DA is allowed.
2. Charge reports should be submitted to all concerned.

(SYED MANZARJAN SAJID)
DISTRICT EDUCATION OFFICER (M),
MALAKAND AT BATKHELA.

Endst No 4643-49 /A-12/G. Transfer of SST(M) Dated Batkhela the 22/7 /2015.

Copy of the above is forwarded for information to:-

1. The Director E&SE Khyber pakhtunkhwa Peshawar.
2. The District Accounts Officer Malakand.
- 3-4 The Principals/ Head Masters concerned, District Malakand.
- 5-7 The Candidate concerned.

TRUE COPY

DISTRICT EDUCATION OFFICER
(M) MALAKAND AT BATKHELA.

گورنمنٹ ہسپتال، لاہور
ڈاکٹر ایچ۔ اے۔ افسانہ صاحب ملا لنگہ ٹیلمنٹ سہیل

(16)

Annexure
عنوان: درخواست برائے منسوخ کرنا آفس آرڈر
تاریخ: 2015-8-6

ضابطہ عالی: مسائل حسب ذیل میں اسان سے:

1۔ ہم نے مسائل حکم ایجوکیشن میں SSI ٹیسٹ کو سنا کر
پہلے کیا تھا ہے۔ قبل ازیں مسائل گورنمنٹ ہائی اسکول
خانی میں کیا تھا۔

2۔ یہ مسائل مورخہ 7/3 کو گورنمنٹ ہائی اسکول خانی
پڑھنے ہوئے تھے۔ اور وہی ڈیوٹی ٹو زمرہ دار کا ہے
مہر نظام کے پاس تھا۔

3۔ ہم نے مورخہ 8/6 کو ہڈیم بالا اور منسوخ ہوا
ہے اور مسائل کو پورا کرنے کے لئے
پہلے دیا گیا ہے۔ جس سے مسائل کو سمجھ
سکتے ہیں اس کا مواظیب۔

لہذا استدعا ہے کہ ہڈیم بالا اور منسوخ
ہو جائے۔ اور مسائل گورنمنٹ ہائی اسکول خانی
میں ڈیوٹی ٹو زمرہ دار کے پاس
مہر نظام کے پاس

TRUE COPY

H

8/2015

شیر علی احمد

The District Education Officer
Malakand, at Batkhela.

Subject: Mercy Application For Cancellation
of order dated 06-08-2015.

Respected Sir,

- ① That The Applicant is Serving as SST at Govt high School No.1 Sakhakot, vide office order dated 03-07-2015.
- ② That The above mentioned order has been cancelled and The cluster signed has been directed to resume duty at old station i.e. GHS Kharaki.
- ③ That The applicant has got some Security Problems and cannot discharge his duty at Kharaki Station.

It is requested that the office order dated 06-08-2015 may be cancelled and the applicant may be remained in the present station i.e. GHS No.1. Sakhakot.

Dated. 07-08-2015.

TRUE COPY

Your's obedient
Shabir Ahmad
SST GHS, Sakhakot.

Endst No: 174

Dated: 28/9/2015

18



Annexure
J

To,

The District Education Officer (M)

Malakand at Batkhela.

Subject: Request for cancellation of transfer order in R/O Shabir Ahmad SST (Bio,Che)

Sir,

It is stated in your kind honor that there are four science classes (Two in 9th and two in 10th)

The undersigned is highly thankful to the Education Deptt: particularly the District officer Malakand who solved the shortage of science teacher and appointed two science SST teachers.

Now all the classes especially science classes of Both 10 and 9th are in full swing.

Respected sir, unfortunately in the meantime the transfer order of Mr. Shabir Ahmad SST (Bio,Che) has been cancelled which is the great loss to the academic carrier of the 9th and 10th classes science students.

Sir,

Mr.Shabir Ahamd SST is an efficient and competent teacher and the students are hundred percent satisfied with the teaching of the concerned teacher. At this crucial movement when the academic session is in full progress, cancellation of his transfer will great effect the teaching learning process.

Therefore, it is requested, for the sake of students, the cancelation of transfer of Mr. Shabir Ahmad SST (Bio,Che) may please be withdraw.

[Signature]

28/9/15

Principal

Govt.High School No.1

Sakhakot
Govt. High School No. 1
Sakhakot M.D. Agency

DEO(M)Mkel
Process this case
and resolve the issue
on merit and submit
report to this office
on urgent basis

[Signature]
01/10
Private Secretary to the Minister for
Elementary and Secondary Education
and Energy & Public Works, Peshawar
Rakhtunkhwa

TRUE COPY

[Signature]

19



Annexure
K

OFFICE OF THE
DISTRICT EDUCATION OFFICER
(M) MALAKAND AT BATKHELA.
No _____/Transfer file.

Dated Batkhela the 2/10/2015.

To

The Principal
GHS No1 Sakhakot.

Subject:- TRANSFER.

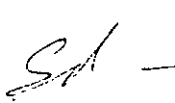
Memo:

Reference your office memo No 174 dated 28.9.2015.

Mr. Shabir Ahmad SST (Sc:) GHS Kharkai has been transferred to GHS No1 Sakhakot against the newly created post vide this office Endst No4451-75 dated 3.7.2015 and further directed to resume his duty at his original school i.e. GHS Kharkai till further order vide this office Endst No5376-77 dated 6.8.2015. But the said teacher has not obeyed the order of the undersigned and report for non-compliance received from Head Master GHS Kharkai vide his office memo No505-6 dated 7.9.2015. Hence the transfer order in respect of the above named teacher has been cancelled due to non-compliance of the transfer order vide this office Endst No6180-83 dated 9.9.2015.

Moreover two SSTs Science teachers have already been working at your school and students are being badly suffered at GHS Kharkai.

You are hereby directed to relive Mr. Shabir Ahmad SST (SC) of your school immediately under intimation to this office with in two positively other- wise his pay may be stopped and disciplinary action will be initiated against you.


DISTRICT EDUCATION OFFICER
(M) MALAKAND AT BATKHELA.

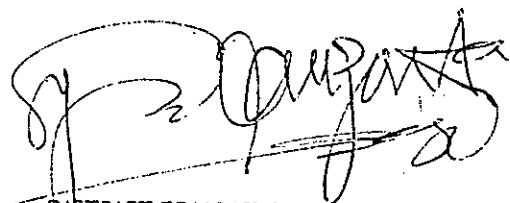
Endst No 6568-70

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

1. Director E&SE Khyber Pakhtunkhwa Peshawar.
2. The Head Master GHS Kharkai.
3. Mr. Shabir Ahmad SST (Sc:) GHS No1 Sakhakot with the remarks to resume your duty i.e at GHS Kharkai with out further delay.

TRUE COPY




DISTRICT EDUCATION OFFICER
(M) MALAKAND AT BATKHELA



ایڈووکیٹ/دستخط

بار کونسل ابار ایسوسی ایشن نمبر:

رابطہ نمبر: 03418176061



5307.

پشاور بار ایسوسی ایشن، خیبر پختونخوا

بعدالت جناب: جسٹس کورٹ آف سیشنز پشاور

منجانب: سردار	دعویٰ:
	علت نمبر:
	موردہ:
	جرم:
	تھانہ:
	بابت تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ آن مقام کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ برصفت دینے جواب دعویٰ اقبال دعویٰ اور درخواست ازہر قسم کی تصدیق زریں مدد و تخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا تاخیر یا کٹرفہ یا اکیل سی برآمدگی اور منسوخی، نیز دائر کرنے اکیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہو گا اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا ساختہ پرداخت منظور قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا وہ وکیل موصوف وصول کرنے کا اختیار ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ مندر ہے۔

المرقوم: 29/05/15

الع بد ————— واد شد ————— الع بد

مقام کے لئے منظور ہے۔

نوٹ: اس جہاز نامہ کی ذمہ داری، قاضی قاضی

August 15
 Khyber Pakhtunkhwa
 Peshawar
 Mian Rehman
 Advocate
 at Maza Khan

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTOONKHWA
PESHAWAR**

Service Appeal No: 1276/2015

**Mr:Shabir Ahmad S/O Ali Ahmad R/O Village Sarogai P.O Meherdai
Tehsil Dargai District Malakand.**

(Appellant)

VERSUS

- 1. The District Education Officer (F) Malakand at Batkhela.**
- 2. The Director Elementary &Secondary Education, Khyber Pakhtunkhwa,
Peshawar.**
- 3. District Education Officer (male)District Malakand.**
- 4. Deputy Commissioner,District Malakand.**
- 5.Mr.Umar Baz SST(Bio)GHS Sakhakot at Malakand..**

.....(Respondents)

Para wise comments on behalf of respondents no 1-4

Respectfully Sheweth
Preliminary Objections.

- 1. That the Appellant has not come to this Honorable Tribunal with clean hands..
- 2. That the appellant has got no cause of action..
- 3. That the appellant is incompetent in its present form..
- 4. That the appellant is estopped by his own conduct to file the instant appeal.
- 5. That the instant appeal is infructious and barred by law.
- 6. That the respondent performs their duties according to law, rules and free of interference of any quarters.

FACTS.

- 1 Pertains to record hence no comments.
- 2. Pertains to record.
- 3. Pertains to record.

4. Correct, the appellant was transferred to GHS Sakhakot on 03/07/2015 but during the summer vacation, Respondent No 3 issued an other order dated 06/08/2015 to all the previous transfer orders holders of July 2015 with along appellant that, they resume their duty at their old station till the arrival of their substitute (**Annexure A**)
5. Incorrect, the order No 5376-77 dated 06/08/2015 issued by Respondent No 3 was not the cancellation order of the appellant but he directed all the previous transfer orders holder of July 2015 that resume their duty at their old station till the arrival of their substitute.(**Annexure A**)
6. Incorrect, the appellant has submitted the appeal to Respondent No 2 dated 21/09/2015 and Respondent No 2 asked the comments in the light of his appeal while Respondent No 3 sent his comments to respondent No 2
(Annexure B,C,D)
7. Incorrect The appellant has got no cause of action and his appeal is liable to be dismissed on the following grounds.

GROUNDS.

- A. Incorrect, the impugned order dated 06/08/2015 has been issued by the competent authority and are according to law and rules on the subject.
- B. Incorrect, the appellant has not obeyed the order of Respondent No 3 was seated according to his own wish in their new station , while respondent No 3 clearly issued order to him that resume their duty at old station till the arrival of their substitute .
- C. Incorrect, the Para is based on malafide and is not tenable. Hence the para is wrong, incorrect and baseless, on malafide and baseless allegations.
- E Incorrect, the appellant is the resident of Union Council Meherdi which is the adjacent Union Council of Kharkai. While his new station Sakhakot is more than two Kilometers away from his residence .
- F Incorrect, the appellant has been treated in accordance with law by the Respondent Department and no violation has been made of the Constitution of Islamic Republic of Pakistan 1973 .
- G. As replied in para above.

In the light of the above facts it is submitted to kindly dismiss the appeal in hand with cost.

RESPONDENT NO.1

23/3/2016
SECRETARY,
E&SE DEPARTMENT, GOVT.
OF KHYBER PAKHTUNKHWA
AT PESHAWAR

RESPONDENT NO.2

18/3/2016
DIRECTOR,
E&SE DEPARTMENT
KHYBER PAKHTUNKHWA
AT PESHAWAR.

RESPONDENT NO.3

[Signature]
DISTRICT EDUCATION OFFICER
(M) MALAKAND AT BATHHELA.

RESPONDENT NO.4

[Signature]
SECRETARY
DEPUTY COMMISSIONER,
MALAKAND AT MALAKAND

AFFIDAVIT

I, do hereby solemnly affirm and declare on oath that all the contents of the accompanying parawise comments are true and correct to the best of my knowledge and belief and all the coddle formalities were fulfilled.

[Signature]
District Education Officer,
(M) Malakand at Bathhela.

(5)

Ammeruse
(A)

(9)

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) MALAKAND AT BATKHELA.

OFFICE ORDER.

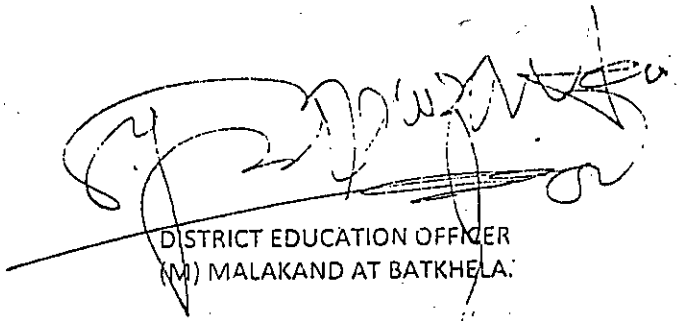
Transfer order issued vide this office Endst No 4451-75 dated 3/7/2015, Endst No 4643-49 dated 22.7.2015, Endst: No4650-56 dated 22.7.2015, Endst No 4661-64 dated 23.7.2015, and Endst No.4924-29 dated 27.7.2015 are hereby directed to resume their duty at old station till the arrival of their substitute.

(SYED MANZAR JAN SAJID)
DISTRICT EDUCATION OFFICER
(M) MALAKAND AT BATKHELA.

Endst No 5374-77 /A-12/G.Transfer of SST (M) Dated Batkhela the 06/02 /2015

Copy of the above is forwarded for information to :-

1. The Director E&SE Khyber Pakhtunkhwa Peshawar.
2. All Principals/Head Master GHS Wartair, Kharki, Palai, B/Payeen, H/Kot, Malakand, Jalalkot, Nai, Zalamkot, Thana No1, Matkani, Makhband, Jalala, Haibatgram and Khanorai Distt: Malakand for strict compliance.


DISTRICT EDUCATION OFFICER
(M) MALAKAND AT BATKHELA.

محکمہ آب و ہوا، گلگت بلتستان، اسلام آباد

عنوان: اپیل

ADD: 18/9/2015

جناب عالی! مؤدیانہ گزارش ہے کہ سائل الفویر 2011ء سے بحیثیت SST(SO) فراڈس منسفی انجام دے رہا ہے۔ سائل کی خواہش ہے سائل کا تبادلہ بحوالہ آرڈر ٹی ای او ملاکنڈ آرڈر نمبر 4475-4451 مورخہ 03/07/2015 GHS خرقی سے GHS نمبر 1 سٹاکوٹ کر دیا گیا۔ ٹرانسفر کی باقاعدہ منظوری بحوالہ آرڈر ٹرانسفر کی درخواست بخواہ آرڈر نمبر 809 مورخہ 03/7/15 دی گئی ہے۔ سائل نے 4/7/15 سے باقاعدہ چارج سنبھال لیے۔ اب بحوالہ ٹی ای او ملاکنڈ آرڈر نمبر 83-6180 مورخہ 9/9/2015 سائل کا تبادلہ منسوخ کر دیا اور سائل کی جگہ GHS ملاکنڈ سے عمر باز SST(SO) کو

A. No. 1371
D. No. 1371
Dated 21/9

آرڈر نمبر 83-6180 کے تحت ٹرانسفر کر دیا۔ حالانکہ

- I) سائل کا Tenure عمر باز صاحب سے زیادہ ہے۔
- II) سائل کی باقاعدہ تنخواہ GHS نمبر 1 سٹاکوٹ سے Release ہو چکی ہے۔
- III) GHS خرقے سے باقاعدہ Relieve ہو چکا ہے۔

اس لئے گزارش ہے کہ سائل کے ساتھ ناالفاظی ہو چکی ہے۔ اس لئے آپ صاحبان سے انصاف دلانے کی درخواست ہے۔ درخواست کے ساتھ Approval کی کاپی، آرڈر کاپی، آرڈر منسوفی کی کاپی اور چارج رپورٹ

18/9/2015

Re Dimashe
The applicant was his del despite your efforts
back to his del despite your efforts
909
21/9

العارضین
18/9/15
شیر احمد SST(SO)
GHS NO 1
سنبھال ملاکنڈ
0345-933852

DDM
21/9

7

Annexure (C)
232

Directorate of Elementary & Secy: Education
Khyber Pakhtunkhwa, Peshawar
No. 320/F.No. 475/Vol-I/SST (M) Malakand
Dated Peshawar the 5/X 2015

To

The District Education Officer,
(Male) Malakand.

Subject: - APPEAL FOR CANCELLATION OF TRANSFER.
Memo:

I am directed to enclose here with a copy of appeal in respect of Mr. Shabir Ahmad SST GHS Kharraqi under transfer to GHS No.1 Sakha Kot vide dated 03-07-2015 on the subject cited above duly recommended by the PS to Honourable Minister for E&SE, Khyber Pakhtunkhwa, for your perusal and further necessary action.

In this regard, I am further directed to ask you to submit your comments/report to this office at an early date for onward submission to Honourable Minister for E&SE Khyber Pakhtunkhwa as desired.

[Signature]
24/10/15
Deputy Director (Estab)
Elementary & Secondary Education
Khyber Pakhtunkhwa.

Endst: No. _____
Copy of the above is to:-

1. PS to Honourable Minister for E&SE, Khyber Pakhtunkhwa for information.
2. PA to Director (E&SE) Khyber Pakhtunkhwa, Peshawar.

*Reply according to
26
09.X.15/E/S*

Deputy Director (Estab)
Elementary & Secondary Education
Khyber Pakhtunkhwa

(8)

Annexure (D)

233

OFFICE OF THE
DISTRICT EDUCATION OFFICER
(M) MALAKAND AT BATKHELA.
No 6868 /Transfer file

Dated Batkhela the 17/10 /2015

To

The Director
E&SE Khyber Pakhtunkhwa
Peshawar,

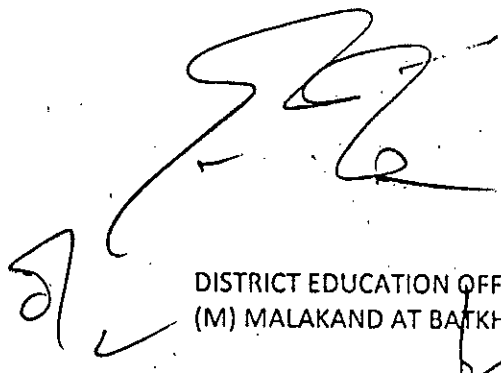
Subject:- APPEAL FOR CANCELLATION OF TRANSFER.

Memo:

Reference your office MemO No320/F.No475/Vol:-1/SST (M) Malakand dated 5.10.2015 on the subject cited above.

It is stated for your kind information that Mr. Shabir Ahmad SST Bio has been transferred to GHS No1 Sakhakot against the newly created post vide this office Endst No4451-75 dated 3.7.2015 and further directed to resume his duty at his original school i.e GHS Kharki till the arrival of his substitute vide this office Endst No 5376-77 dated 6.8.2015. But the said teacher has not obeyed the order of the undersigned and report for non-compliance received from the Head Master GHS Kharki vide his office memo No 505-6 dated 7.9.2015. Hence the transfer order in respect of the above named teacher has been cancelled due to non-compliance of the transfer order vide this office Endst: No6180-83 dated 9.9.2015 and the applicant now working at GHS No1 Sakhakot Instead of GHS Kharki.

Submitted for your perusal and further necessary action please.



DISTRICT EDUCATION OFFICER
(M) MALAKAND AT BATKHELA