

3

27.04.2015

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant is a disabled Civil Servant and posted as PSHT at GPS Nikka Paa, Haripur vide order dated 7.1.2015 which was withdrawn to the disadvantage of the appellant vide impugned order dated 10.1.2015 regarding which the departmental appeal was preferred on the same date i.e 10.1.2015 and after lapse of statutory period service appeal was preferred on 23.4.2015.

Order dated 7.1.2015 would prima-facie suggest that Mr. Khalid Mehmood, PSHT, GPS Nikkah Paa was transferred from the said school on certain administrative/disciplinary grounds which was withdrawn vide impugned order dated 10.1.2015.

Let pre-admission notice be issued to official respondents for 20.5.2015. Till then status-quo be maintained. The appeal pertains to territorial limits of Hazara Division and as such to be posted at Camp Court Abbottabad.


Chairman

4 20.5.2015

Appellant in person and Said Badshah, ADO (lit) alongwith Mr. Muhammad Tahir Aurangzeb, G.P for official respondents present. Submitted application alongwith copy of affidavit according to which the appellant is to be transferred to GPS Nikkah Paa on 31st October 2015.

In view of the afore-stated application, the appeal is dismissed as withdrawn. File be consigned to the record.

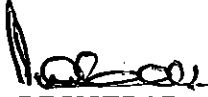


ANNOUNCED
20.5.2015


Chairman
Camp Court A/Abad
20.05.15

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 364/2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	23.04.2015	<p style="text-align: center;">The appeal of Mr. Rashid Nawaz presented today by Mr. Muhammad Zareed Qureshi 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	27-4-15	<p style="text-align: center;">This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>27-4-15</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> 

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

Service Appeal No. 364 /2015

Rashid Nawaz son of Ghulam Fareed resident of Village Barthal, P.O Sarai e Saleh, Tehsil & District, Haripur, presently Head Teacher PSHT Govt. Primary School Nikka Paa, Tehsil & District, Haripur.

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa through Secretary Education Peshawar & others.

...RESPONDENTS

SERVICE APPEAL


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5.	Copy of order	12	"C"
6.	Copies of application and order from the office of Chief Minister	13 to 14	"D" & "E"
7.	Copy of policy	15 to 16	"F"
8.	Copies of order and charge report	17 to 18	"G" & "H"
9.	Copy of cancellation order	19	"I"
10.	Copy of appeal	20	"J"
11.	Wakalatnama	21	

...APPELLANT

Dated: 21/4 /2015

Through


 (Muhammad Zareed Qureshi)
 Advocate High Court, Abbottabad

BEFORE THE KHYBER PAKHTUNKHAWA,
SERVICE TRIBUNAL PESHAWAR.

Service Appeal No. 369 /2015

Rashid Nawaz son of Ghulam Fareed resident of Village Barthal, P.O Sarai e Saleh, Tehsil & District, Haripur, presently Head Teacher PSHT Govt. Primary School Nikka Paa, Tehsil & District, Haripur.

...APPELLANT

VERSUS

S.W.F Province
Service Tribunal
Diary No 401
Dated 23-4-2015

1. Govt. of Khyber Pakhtunkhwa through Secretary Education Peshawar.
2. District Education Officer, District Haripur.
3. Sub-Divisional Education Officer SDEO (Male) Haripur.
4. ASDEO Circle Sarai e Saleh, Haripur.
5. Khalid Mehmood Head Teacher PSHT, Govt. Primary School, Neelan Bhoto, Haripur.

...RESPONDENTS

APPEAL UNDER SECTION 4 OF THE KPK SERVICE TRIBUNAL ACT, 1974 AGAINST THE ORDER EVEN NO. & DATE RECEIVED ON 10/01/2015 WHEREBY THE TRANSFER ORDER OF APPELLANT ENDST; NO. 24-26 DATED 07/01/2015 VIDE WHICH THE APPELLANT WAS TRANSFERRED FROM GOVT. PRIMARY SCHOOL NEELAN BHOTO TO GOVT. PRIMARY SCHOOL NIKKA PAA IS ORDERED TO BE CANCELLED.

2014/15
Registrar

PRAYER:- ON ACCEPTANCE OF INSTANT APPEAL, THE CANCELLATION ORDER PASSED BY RESPONDENT NO. 3 MAY KINDLY BE SET ASIDE AND ORDER OF APPELLANT ENDST NO. 24-26 DATED 07/01/2015 BE RESTORED.

Respectfully Sheweth:-

The facts giving rise to the instant appeal are arrayed as under:-

1. That the appellant is serving in Education Department since 10/10/1994 and presently appellant is serving as a PSHT at Govt. Primary School, Nikka Paa.
2. That vide order No. 3136~~9~~ dated 22/11/2014 appellant was promoted to BPS-15 while he was serving at Govt. Primary School Chack Mohri and transferred to GPS Neelan Bhoto Haripur. Copy of order is attached as Annexure "A".
3. That appellant is disable and the appointment of appellant was also based on disabled quota. Copy

of disability certificate is attached as Annexure "B".

4. That despite of the fact that appellant is disable one and there is vacant post in GPS Chack Mohri, respondent No. 3 instead of issuing adjustment order of appellant adjusted one Azam Khan PSHT from GPS Neelan Bhoto to GPS Chack Mohri vide order No. 2042-44 dated 21/07/2014. Copy of order is annexed as Annexure "C".
5. That due to posting at far flung area and distance of about 4 hours by foot appellant preferred an application to Chief Minister KPK. Copies of application and order from the office of Chief Minister are attached as Annexures "D" & "E" respectively.
6. That the Government Policy regarding posting transfer also favours the appellant. Copy of policy is attached as Annexure "F".
7. That on 07/01/2015 respondent No. 3 transferred the appellant vide order Endst No. 24-26 dated 07/01/2015 to Govt. Primary School Nikka Paa,

which is away from appellant home station but the school is on road side, appellant took the charge at Govt. Primary School, Nikka Paa. Copies of order and charge report are annexed as Annexures "G" & "H" respectively.

8. That on 10/01/2015 respondent No. 3 again issued a cancellation order in respect of order dated 07/01/2015. The cancellation order was handed over to appellant on 10/01/2015 having not mentioned any date and number. Copy of cancellation order is attached as Annexure "I".
9. That appellant filed a departmental appeal against the cancellation order, which has not been decided by the respondents yet now. Copy of appeal is annexed as Annexure "J".
10. That cancellation order issued by respondent No. 3 vide which the transfer order of appellant No. 24-26 dated 07/01/2015 was cancelled is against the law, fact arbitrary and based on nepotism and is the result of influence and is liable to be set aside and appellant is entitle to be remain posted at GPS Nikka Paa on the basis of transfer order No. 24-26

dated 07/01/2015 on the following amongst the other grounds;-

GROUND:-

- a. That the appellant is disabled person and as such enjoys a special status as per Govt. Policy.
- b. That the impugned order of cancellation of transfer order of appellant is based on malafide, nepotism and is not tenable in the eyes of law.
- c. That the appellant was entitle to be adjusted at Govt. P.S Chack Mohri but due to malafide intention of respondents appellant was transferred to far flung area and later on adjusted/ transferred to GPS Nikka Paa and after about 2 days of order, respondents issued a cancellation order, hence respondents made the appellant as rolling stone and the act of respondent is not justifiable in the eyes of law and justice.

- d. That respondent No. 5 admitted the rights of appellant before the Civil Court in case titled "Rashid Nawaz v/s Secretary Education".
- e. That the cancellation of transfer of the appellant is against the policy and is premature.

It is, therefore, humbly prayed that on acceptance of instant appeal, the cancellation order in respect of transfer order No. 24-26 dated 07/01/2015 be set aside and the order No. 24-26 dated 07/01/2015 be restored.

Dated: 21-04/2015

Through;


(Muhammad Zareed Qureshi)
Advocate High Court, Abbottabad


...APPELLANT

VERIFICATION: -

Verified on oath that the contents of forgoing service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court


APPELLANT

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

Service Appeal No. _____/2015

Rashid Nawaz son of Ghulam Fareed resident of Village Barthal, P.O Sarai e Saleh, Tehsil & District, Haripur, presently Head Teacher PSHT Govt. Primary School Nikka Paa, Tehsil & District, Haripur.

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa through Secretary Education Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, Rashid Nawaz son of Ghulam Fareed resident of Village Barthal, P.O Sarai e Saleh, Tehsil & District, Haripur, presently Head Teacher PSHT Govt. Primary School Nikka Paa, Tehsil & District, Haripur, do hereby solemnly affirm and declare that the contents of forgoing service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.

Identified By:-

21/7/15
A

(Muhammad Zareed Qureshi)
Advocate High Court, Abbottabad



(Signature)
DEPONENT

BEFORE THE KHYBER PAKHTUNKHAWA,
SERVICE TRIBUNAL PESHAWAR.

Service Appeal No. _____/2015

Rashid Nawaz son of Ghulam Fareed resident of Village Barthal, P.O Sarai e Saleh, Tehsil & District, Haripur, presently Head Teacher PSHT Govt. Primary School Nikka Paa, Tehsil & District, Haripur.

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa through Secretary Education Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

APPLICATION FOR SUSPENSION OF CANCELLATION ORDER EVEN NO. AND DATE VIDE WHICH THE TRANSFER ORDER OF APPELLANT NO. 24-26 DATED 07/01/2015 WAS CANCELLED, AND FOR ISSUANCE OF STATUS QUO TO THE EFFECT THAT RESPONDENTS BE RESTRAINED TO TRANSFER THE RESPONDENT FROM GOVT. PRIMARY SCHOOL NIKKA PAA AND FORCIBLY TAKING CHARGE FROM APPELLANT OR STOPPING SALARY TILL THE DISPOSAL OF INSTANT APPEAL.

=====

Respectfully Sheweth;-

1. That the titled appeal is being filed today before this Service Tribunal, contents of this application may kindly be considered as part and parcel of main service appeal.
2. That the appellant has brought a good prima facie case and balance of convenience also lies in his favour. Moreover there is every likelihood of his success.

3. That if operation of impugned order is not suspended, the appellant would be subjected to irreparable loss and purpose of filing of titled appeal will become infructuous.

It is therefore, humbly prayed that on acceptance of instant application, operation of impugned order may kindly be suspended, and issue status quo to the effect that respondents be restrained to transfer the respondent from Govt. Primary School Nikka Paa and forcibly taking charge from appellant or stopping salary till the disposal of instant appeal.

Dated: 21-04/2015

Through;

(Muhammad Zareed Qureshi)
Advocate High Court, Abbottabad

...APPELLANT

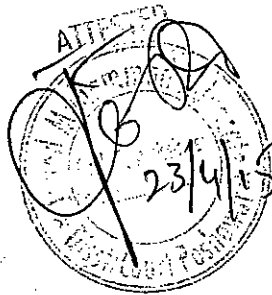
AFFIDAVIT

I, Rashid Nawaz son of Ghulam Fareed resident of Village Barthal, P.O Sarai e Saleh, Tehsil & District, Haripur, presently Head Teacher PSHT Govt. Primary School Nikka Paa, Tehsil & District, Haripur, do hereby solemnly affirm and declare on oath, that the contents of foregoing application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.

Identified By:-

(Muhammad Zareed Qureshi)
Advocate High Court, Abbottabad

DEPONENT





OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
HARIPUR

OFFICE ORDER

Consequent upon the approval of the Departmental Committee, approved in the meeting held on 13/11/2014 and approval of the District Education officer (M) Haripur dated 14/11/2014 Upgradation/Promotion of SPST PSHT BPS-15. The services of the following newly upgraded PSHTs EPS -15((8500-700-29500) 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 conditions given below with immediate effect and from the date posted in the schools noted against each, posts mentioned against their names w.e.f 14/11/2014 in the best interest of public service subject to the terms and conditions remain intact as mentioned in the notification referred above.

S.No	Seniority No	Teacher Name	Father Name	School Name	Place of New Posting
1	1	Pervaiz	Ghulam Haider	GPS Kainthla	GPS Raj Dhani Against vacant Post
2		Nawaz Akhter	Gulistan Khan	GPS Gali	GPS Sawar Maira
3	5	Anjid Mahmood	Khan Afsar	GPS Sarai Saleh	GPS Davi Against vacant Post
4	7	Fazal Khan	Ahmed Khan	GPS Dolni	GPS Shergah Against vacant Post
5	8	Muhammad Aslam	Said Muhammad	GPS Singliala	GPS Bait Gali Against vacant Post
6	9	Masroor Anwar Khan	Muhammad Anwar Khan	GPS Shoh Muhammad	GPS Tavi Against vacant Post
7	12	Muhammad Yousuf	Allah Bakhsh	GEMPS Khoi Maira	GPS Kotla Against vacant Post
8	13	Sadaqat	Muhammad Saleem	GPS Aldo Jabbi	GPS Bandi Saydan Against vacant Post
9	15	Ishtiaq Hussain	Aarib Hassan	GPS Parkot	GPS Kharian Against vacant Post
10	17	Shahid Mahmood	Ghulam Nabbi	GPS Sarai Saleh	GPS Shingri Against vacant Post
11	18	Hashmat Hussain Niazi	Shafiq Hussain Malik	Kahal	GPS Bees Ban Against vacant Post

Muhammad Zareed Qureshi
Advocate
Haripur
Attested

4/12/14

12	20	Abdul Khaliq Nasir Shah	Abdul Jalil Syed Mozamir Shah	Chajain Gps Kafi Kundi	GPS Siri Bhang Against vacant Post
13	21				GPS Kheri Against vacant Post
14	22	ABDUL HAFFEEZ	ABDUL AZIZ	GPS BANDI GULLOO	GPS Kheri Nara Against vacant Post
15	23	Muhammad Shafique	Muhammad Akram	GPS Singrauli	GPS Singrauli Against vacant Post
16	24	Taheed Ahmad	Abdul Sagheer	GPS Sarhadia	GPS Chasidan Against vacant Post
17	25	Rashid Nawaz	Ghulam Farced	GPS Chack Mohri	GPS Neelan Bhoto Against vacant Post
18	26	Shahzada Khurram	Abdul Qayyum Khan	GPS Mohkyar	GPS Dharrian Against vacant Post
19	28	Jahanger Iqbal	Abdul Hameed	GPS Kheri	GPS Kheri Against vacant Post
20	29	Umer Hayat Khan	Shukat Zaman Khan	GPS Makhan Colony	GPS Sheldar Zareen Against vacant Post
21	30	KHALID MEHMOOD KHAN	SULTAN Muhammad KHAN	GPS DEHDAN	GPS Sora Against vacant Post
22	31	MUHAMMAD IAZ	MUHAMMAD ISMAIL	GPS GANJA	GPS Sathuna No.2 Against vacant Post
23	32	Raja Amer sultan	Raja Farooq Khan	GPS Banth	GPS Banth Against vacant Post
24	33	ZARSHAD AHMAD	KALA KHAN	GPS BHIERA KALU PIND	GPS Ziarat Bela Against vacant Post
25	34	NASIR SHAH	AMIN SAHABI	GPS Gudedian	GPS Sheldar Bala Against Vacant Post

Terms and conditions:-

- 1 They would be on probation for a 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 services can be terminated at any time, in case of their performance is found unsatisfactory during probationary period. In case of misconduct, they will 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/EA is allowed for joining his duty.
- 7 They will give an under taking to be recorded in their service books to the effect that if any over payment is made to them in the light of this order will be recovered and if they are wrongly promoted they will be reverse.

60

DISTRICT EDUCATION OFFICER (MALE)
HARIPUR

Dated. 22/11/2014

Endst: No. 1036-39

1. Senior District Accounts Officer Haripur
2. Sub Divisional Education Officer (Male) Haripur
3. P.A. to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
4. Officials Concerned.
5. Office Record File

BY: DISTRICT EDUCATION OFFICER (MALE)
HARIPUR



GOVERNMENT OF KHYBER PUKHTUNKHWA
 DIRECTORATE OF SOCIAL WELFARE AND WOMEN DEVELOPMENT
 PROVINCIAL COUNCIL FOR THE REHABILITATION OF DISABLED PERSONS (PCRD)

Dated 24-07-2013-

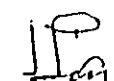
Reg No. HR 13572 - PCRD/Khyber Pakhtunkhwa

ANNEXURE "B"
 Muhammad Zareed Qureshi
 Advocate
 Abbottabad
 Attested
 H. J. A.

DISABILITY CERTIFICATE
ASSESSMENT BOARD FOR THE DISABLED PERSON

- 1 Name Rashid Nawaz
- 2 Father's Name Ghulam Farid
- 3 Married/ unmarried _____
- 4 Spouse 04-
- 5 Date of Birth 04-02-1975
- 6 N.I.C.# 13302-0454124-9
- 7 Qualification B.A.
- 8 Nature of Disability Physically Handicapped
- 9 Present Address village Barthal P.O. Sarvai Saleh Teh. A District Haripur
- 10 Permanent Address As Above
- 11 Recommended by the Board as Disabled _____

Attested
 Raj Bibi
 S.E.T.B.P.S 16
 G.G.H.S Bagra Haripur


 District Officer
 Social Welfare Community Development
 Haripur



OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER
(MALE)
HARIPUR

ADJUSTMENT ORDER

The services of Mr. Azam Khan PSHT, GPS, Neelan, Bhoto, are hereby adjusted against the vacant post of PSHT at GPS Chack Mohri Noordi subject to the promotion of Mr. Ajmal Khan PSHT, GPS, Chack Mohri w.e.f the taking over their charges, in the best interest of public service.

Note:-

1. No TA/DA is allowed.
2. Charge handing taking will be made through ASDEO concerned circle office without any delay.

Muhammad Zureed Qureshi
Advocate
Abbottabad
2/7/14

-sel-
Sub Divisional Education Officer
(Male) Haripur

Ends: No 2042-44-1 Dated Haripur the 21/7/2014

Copy to:-

1. The District Education Officer (Male) Haripur for information.
2. The ASDEO Concerned circle.
3. The Head Teacher concerned Schools.
4. Office record file.

[Signature]
Sub Divisional Education Officer
(Male) Haripur

محترم صاحب سندھ ہائی کورٹ لاہور، لاہور اور

سندھ ہائی کورٹ - ایبٹ آباد

EDG - H-10

میں سے

12/12/2014

گزارش ہے کہ سائل بحیثیت SPST ڈیڑھ سال سے عدالت میں مقیم ہے اور اس کی درخواستیں منظور نہیں ہو رہی ہیں۔ سائل نے عدالت میں درخواستیں دائر کر کے اس کی درخواستیں منظور کرنے کے لیے کوشش کی ہے اور اس کی درخواستیں منظور نہیں ہو رہی ہیں۔ سائل نے عدالت میں درخواستیں دائر کر کے اس کی درخواستیں منظور کرنے کے لیے کوشش کی ہے اور اس کی درخواستیں منظور نہیں ہو رہی ہیں۔

Muhammad Zareed Qureshi
Advocate
Abbottabad

Attest
2/12/14

کے قریبی رشتہ دار ہیں۔ عدالت نے سائل کی درخواستیں منظور کرنے کے لیے کوشش کی ہے اور اس کی درخواستیں منظور نہیں ہو رہی ہیں۔ سائل نے عدالت میں درخواستیں دائر کر کے اس کی درخواستیں منظور کرنے کے لیے کوشش کی ہے اور اس کی درخواستیں منظور نہیں ہو رہی ہیں۔

سائل ایک معذور آدمی ہے جس کی معذوری کا سرٹیفکیٹ بھی درخواست کے ساتھ لگایا گیا ہے۔ سائل نے عدالت میں درخواستیں دائر کر کے اس کی درخواستیں منظور کرنے کے لیے کوشش کی ہے اور اس کی درخواستیں منظور نہیں ہو رہی ہیں۔ سائل نے عدالت میں درخواستیں دائر کر کے اس کی درخواستیں منظور کرنے کے لیے کوشش کی ہے اور اس کی درخواستیں منظور نہیں ہو رہی ہیں۔

اس اعتبارات کے ناظرین اس کے لیے درخواستیں منظور کرنے کے لیے کوشش کی ہے اور اس کی درخواستیں منظور نہیں ہو رہی ہیں۔ سائل نے عدالت میں درخواستیں دائر کر کے اس کی درخواستیں منظور کرنے کے لیے کوشش کی ہے اور اس کی درخواستیں منظور نہیں ہو رہی ہیں۔

العدان

PSHT
میں سے



14
ANNEXURE
"E"

CHIEF MINISTER'S COMPLAINT AND REDRESSAL
Chief Minister's Secretariat Khyber Pakhtunkhwa

Phone No. 091-9222460-64
Fax No. 091-9212237
E-Mail cms_kpk@yahoo.com
Address. S.A.Q Road Peshawar

No. SO-II(C&RC)/CMS/KP/1-2/2014/Rashid Nawaz/App. 16840
Dated Peshawar the 24th December, 2014.

To

The District Education Officer,
Haripur.

Subject:- **COMPLAINT REGARDING INCORRECT POSTING /
TRANSFER / ADJUSTMENT OF MR. RASHID NAWAZ, PSHT.**

I am directed to refer to the subject noted above and to enclose herewith a self-explanatory complaint received in the Complaint and Redressal Cell of this Secretariat from Mr. Rashid Nawaz, PSHT, Govt. Primary School, Haripur.

I am therefore directed that necessary action may be taken in the matter as per law/rules and furnish report to this Secretariat for perusal of the competent authority.

Encl: As above.
Endst. No. and date even


SECTION OFFICER-II (C&RC)

Copy forwarded to:-

1. P.S to Principal Secretary to Chief Minister Khyber Pakhtunkhwa.
2. P.S to Chairman Complaint Cell, Chief Minister's Secretariat, Khyber Pakhtunkhwa, Peshawar.

SECTION OFFICER-II (CR&C)



Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

PH No. 091-9201389, 9210938,
9210437, 9210957, 9210468
Fax 091-9210936 0800-33857
No. 2412-384 / Promotion/Estab
Dated Peshawar the 31/01/2013.

(A)

(B)

To
All the District Education Officers,
(Male & Female), in Khyber Pakhtunkhwa.

Subject:- Guidelines for Posting of PST B-12 on Promotion to the post of Senior PST B-14 and PSHT B-15, Qari B-12 to B-15, CT B-15 to Senior CT B-16, AT B-15 to Senior AT B-16, TT-15 to Senior TT B-16, DM B-15 to Senior DM B-16 and PET B-15 to Senior PET B-16.

Memo:
I am directed to refer to the subject noted above and to clarify that posts of PST B-12 /Senior PST B-14/PSHT B-15 may be rationalized and re-distributed among the Primary schools in the following manner and on Promotion of PST B-12 to the post of Senior PST B-14 and PSHT B-15, may be posted as under:-

Up gradation of Posts in Primary Schools (Female) After Rationalization @ 1-40 ratio

S.No	School Code	Name of Primary School	Total Enrolment	Sanctioned Posts after Rationalization							
				SST B-16	CT B-15	PSHT B-15	SPST B-14	PST B-12	NQ	Callar	Chow
1	25288	GGPMS A (JICA)	208	1	2	0	2	3	1	1	1
2	25048	GGPMS B (JICA)	306	1	2	0	2	6	1	1	1
3	25143	GGCMS C	173	1	0	0	2	3	1	1	1
4	30056	GGPS D	110	0	0	1	0	1	0	0	1
5	25224	GGPS E	160	0	0	1	1	1	0	0	1
6	25244	GGPS F	198	0	0	1	1	2	0	0	1
7	25277	GGPS G	240	0	0	1	1	3	0	0	1
8	25221	GGPS H	285	0	0	1	2	3	0	0	1
9	32212	GGPS I	320	0	0	1	2	4	0	0	1
10	25097	GGPS J	360	0	0	1	2	5	0	0	1
11	25138	GGPS K	400	0	0	1	2	6	0	0	1
12	32606	GGPS L	440	0	0	1	3	6	0	0	1
13	25278	GGPS M	440	0	0	1	3	7	0	0	1
Total			3250	3	4	10	23	50	3	3	13

Up gradation of Posts in Primary Schools (Male) After Rationalization @ 1-40 ratio

S.No	School Code	Name of Primary School	Total Enrolment	Sanctioned Posts after Rationalization			
				PSHT B-15	SPST B-14	PST B-12	Chow
1	30056	GPS A	110	1	0	1	1
2	25224	GPS B	160	1	1	1	1
3	25244	GPS C	198	1	1	2	1
4	25277	GPS D	240	1	1	3	1



ATTESTED

Hm

1. DDEEM
2. SDEEM
3. All the ADos (s)
4. B2A
5. Office file.

(Signature)

Compliance as per
Direction.

14/1/13

5	25221	GPS E	240	1	2	3	1
6	32912	GRSF	285	1	2	4	1
7	25097	GPS G	320	1	2	5	1
8	25138	GPS H	360	1	2	6	1
9	32606	GPS I	400	1	3	6	1
10	25278	GPS J	440	1	3	7	1
Total			2563	10	17	38	10

Note:-

1. Each Primary School (except JICA & Community Model School where SST post is sanctioned) will have one post of PSHT B-15. ✓
2. There will be no post of PSHT B-15 & SPST B-14 in MPS. ✓
3. No of posts of PSHT B-15, SPST B-14 & PST B-12 will not exceed the already communicated sanctioned posts.

Posting on Promotion

4. On Promotion of PST B-12 to the post of Senior PST B-14 and PSHT B-15, may be posted in the same UCs Subject to the provisions of sanctioned post.
5. Senior-most PSHT B-15, SPST B-14 & PST B-12 (According to the Seniority list) may be retained in the school of their present posting and junior most may be transferred to other schools.
6. In their promotion order it should be mentioned that their Inter-se-Seniority on lower post will remain intact.
7. If anyone forego promotion, Entry to this effect may be made if his/her Service book.
8. Minimum qualifications for the above posts have already been prescribed in the Service Rules notified vide Government of Khyber Pakhtunkhwa Elementary and Secondary Education Department Notification No. SO (PE) 4-5/SSRC/Meeting/2012/Teaching Cadre Dated the November 13, 2012.

I am further directed to further clarify that:

1. On promotion Qari B-12 to the post of Senior Qari B-15, CT B-15 to Senior CT B-16, AT B-15 to Senior AT B-16, TT-15 to Senior TT B-16, DM B-15 to Senior DM B-16 and PET B-15 to Senior PET B-16, will be posted in High and Higher Secondary Schools
2. 1/3 Qari B-12 posts will be upgraded to Senior Qari B-15, CT B-15 to Senior CT B-16, AT B-15 to Senior AT B-16, TT-15 to Senior TT B-16, DM B-15 to Senior DM B-16 and PET B-15 to Senior PET B-16 in High and Higher Secondary Schools only in Elementary and Secondary Education Department at District Level.
3. No post of CT B-15, PET B-15, AT B-15, DM B-15, TT-15, will be upgraded to B-16 in Middle Schools.
4. Senior most Senior CT B-16, Senior AT B-16, Senior DM B-16, Senior PET B-16, Senior TT B-16 (According to the Seniority list) may be retained in the schools of their present posting and junior most may be transferred to other schools.
- 5.

(Signature)
Dy: Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

Endst: No. / File No. 1/A-88/KC/S list. Dated Peshawar the 18/01/2013.

- Copy forwarded for information and necessary action to the:-
1. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
 2. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
 3. M/File

(Signature)
Dy: Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar



**Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar**

PH No: 091-9201389, 9210938,
9210437, 9210957, 9210468
Fax: 091-9210936 0800-33857
No: 104-59/Rationalization/Estab
Dated Peshawar the 01/04/2014.

16

To

All the District Education Officers,
(Male & Female), in Khyber Pakhtunkhwa.

Subject:- Guidelines for Posting of Teachers as a result of rationalization.

Memo:

I am directed to refer to the subject noted above and to clarify that posts of PST B-12 /Senior PST B-14/PSHT B-15 may be rationalized and re-distributed among the Primary schools in the following manner and PST B-12, Senior PST B-14 and PSHT B-15 may be posted as under:-

Distribution of Posts in Primary Schools

Rationalization of Posts @ 1-40 ratio in Primary Schools (Female)									
S.No	School Code	Name of Primary School	Total Enrolment	Sanctioned Posts after Rationalization					Total
				SST B-16	CT B-15	PSHT B-15	SPST B-14	PST B-12	
1	25288	GGPMS A (JICA)	1-100	1	2	0	1	1	6
2	25048	GGPMS B (JICA)	101-140	1	2	0	1	2	6
3	25143	GGCMS C	141-180	1	0	0	2	2	7
4	30056	GGPS D	181-220	0	0	1	0	1	2
5	25224	GGPS E	221-260	0	0	1	1	1	3
6	25244	GGPS F	261-300	0	0	1	1	2	4
7	25277	GGPS G	301-340	0	0	1	1	3	5
8	25221	GGPS H	341-380	0	0	1	2	3	6
9	32912	GGPS I	381-420	0	0	1	2	4	7
10	25097	GGPS J	421-460	0	0	1	2	5	8
11	25138	GGPS K	461-500	0	0	1	2	6	9
12	32606	GGPS L	501-540	0	0	1	3	6	10
13	25278	GGPS M	541-580	0	0	1	3	7	11

Muhammad Zareed Qureshi
Advocate
Abbottabad
Attested
29/12/14

Rationalization of Posts @ 1-40 ratio in Primary Schools (Male)							
S.No	School Code	Name of Primary School	Total Enrolment	Sanctioned Posts after Rationalization			Total
				PSHT B-15	SPST B-14	PST B-12	
1	30056	GPS A	101-140	1	0	1	2
2	25224	GPS B	141-180	1	1	1	3
3	25244	GPS C	181-220	1	1	2	4
4	25277	GPS D	221-260	1	1	3	5
5	25221	GPS E	261-300	1	2	3	6
6	32912	GPS F	301-340	1	2	4	7
7	25097	GPS G	341-380	1	2	5	8
8	25138	GPS H	381-420	1	2	6	9
9	32606	GPS I	421-460	1	3	6	10
10	25278	GPS J	461-500	1	3	7	11

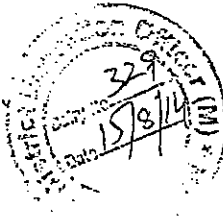
Note:-

- Each Primary School (except JICA & Community Model School where SST post is sanctioned) will have one post of PSHT B-15 and one post PST B-12.
- There will be no post of PSHT B-15 & SPST B-14 in MPS.

PA

S/O DDO (M)

13/8
DO (M)
1318714



No 267 dated 16/8/14
Hassan SK
Pl. to clear w/ help of all the ASDFOs etc
S/O DDO
716

059-2812162

Rationalization of CT Posts @ 1 CT per 1.5 Section in Middle/High/Higher Secondary Schools (Male)

S.No	School Code	Name of Primary School	Total Enrolment	Sanctioned Posts after Rationalization		
				Class	No of Sections	CT
1	30056	GPS A	1-80	6 th	1	Minimum 2 CT per school afterward 1 per 1.5 section
			1-120	7 th	2	
			1-120	8 th	3	
2	25277	GPS B	1-60	6 th	1	Minimum 2 CT preschool afterward 1 per 1.5 section
			1-80	7 th	2	
			1-120	8 th	2	
			1-60	9 th	1	Minimum 4 SST per school (one Bio Chem) +one Math ,Phy) and 2 SST Gen) afterward 2 SST per Section
			1-80	10 th	2	

Posting of Teachers on rationalization.

I am further directed to further clarify that:

1. On rationalization surplus teachers in Primary Schools ,PST B-12 , Senior PST B-14 , may be posted in the nearest school if possible then in the same UCs and then in the same circle and then in the same Sub Division and then in the same District Subject to the provisions of need,
2. Senior most PSHT B-15, SPST B-14 & PST B-12 (According to the Seniority list) may be retained in the same school of their present posting and junior most may be transferred to other needy schools.
3. No teacher of CT B-16, PET B-16, AT B-16, DM B-16, TT-16, will be posted in Middle Schools.
4. Senior most Senior CT and SST (According to the Seniority list) may be retained in the schools of their present posting and junior most may be transferred to other schools.
5. ~~Disable teacher may be retained in the schools of their present posting, another teacher may be shifted instead of disable.~~
6. Widow teacher may not be transferred to another school on rationalization, another teacher may be shifted instead of ~~disabled~~
7. Two schools of same level working in one building may be merged with each other.

Dy: Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

Endst: No. 6160-62 / File No: 1/A-88/KC/S.list : Dated Peshawar the 01/04/2014.

- Copy forwarded for information and necessary action to the:-
1. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
 2. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
 3. M/File

Dy: Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

870
 251489
 High ←



OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER
(MALE) HARIPUR

ORDER

The services of Mr. Khalid Mehmood PSHT GPS Nikkah Paa are hereby transferred/shifted to GPS Neelan Bhoto immediately on administrative/disciplinary ground and directed to leave the charge without any delay in the best interest of public service with immediate effect:-

Note:

1. Mr. Rashid Nawaz PSHT GPS Neelan Bhoto is hereby adjusted at GPS Nikkah Paa to fill the gap.
2. No TA/DA is allowed to anyone.
3. Charge handing taking will be made through concerned ASDEO Circle office without any delay.

-----Sd-----
Sub Divisional Education Officer
(M) Haripur

Dated Haripur the 07/01/2015

Ends: No 24-261
Copy to:-

1. The District Education Officer (M) Haripu for information.
2. The ASDEO Circle Khanpur & Sarai Salah.
3. The Head Teacher concerned Schools.
4. Office record file.

[Signature]
Sub Divisional Education Officer
(M) Haripur

[Signature] Muhammad Zareed Qureshi
Advocate
Abbottabad

Attested
21/1/15

"H"

چارج رپورٹ

از دفتر سب ڈویژنل ایجوکیشن آفیسر صاحب (مردانہ) پرائمری صلاح پورا آرڈر نمبر 24-26

تاریخ 07.01.2015 تحت کسی PSHT

ولدہ مغلہم نسرین (GMPS/GPS) PSHT/SPST/PST

کو آج مورخہ 8.01.2015 کو کول از دو پیر ایچ ڈی ایچ ڈی پیر سکول حذا سے ریٹائر کیا جاتا ہے اور ہدایت کی جاتی ہے

کہ وہ اپنے نئے سکول GMPS/GPS نیکر پانچ میں چارج ٹیکر رپورٹ دفتر ارسال کریں۔

نوٹ: تصدیق کیا جاتا ہے کہ مذکورہ ٹیچر کے ذمہ سپورٹس فنڈز۔ پی ٹی سی فنڈز۔ چارج سٹاک اشیاء مال در دیگر کوئی بھی نہیں ہے۔

ہیڈ ماسٹر
GMPS/GPS Head Teacher
Govt. P.S. School Neelan-Bhor
08/1/2015

Muhammad Jafar SPST

Muhammad Zameer
Advocate
Abbottabad

Attested
4/1/15

چارج رپورٹ

میں کسی پرائمری صلاح پورا آرڈر نمبر 24-26

تاریخ 07.01.2015 تحت کسی PSHT

ولدہ مغلہم نسرین (GMPS/GPS) PSHT/SPST/PST

کو آج مورخہ 9.01.2015 کو کول از دو پیر ایچ ڈی ایچ ڈی پیر سکول حذا سے ریٹائر کیا جاتا ہے اور ہدایت کی جاتی ہے

چارج رپورٹ ارسال دفتر ہے۔

دستخط چارج گر ہندہ

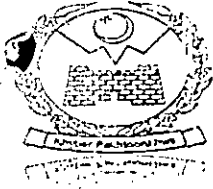
(PSHT)
09.01.2015

نائب افسر ایجوکیشن

PST

دستخط چارج دہندہ

09/01/2015



19 ANNEXURE
OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER "I"
(MALE) HARIPUR

CANCELLATION

The office order issued under Endst: No.24-26 Dated 07-01-2015 is hereby cancelled in the best interest of public service with immediate effect.

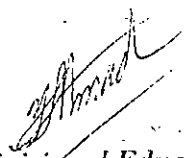
-----Sd-----
Sub Divisional Education Officer
(Male) Haripur

Muhammad Zameed Qureshi
Advocate
Abbottabad
Attested
21/1/15

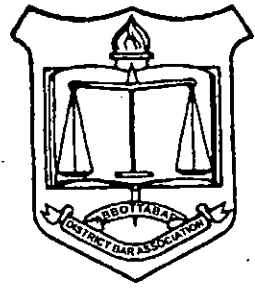
Even No: & Date

Copy to:-

1. The District Education Officer (Male) Haripur for information, please.
2. The ASDEO concerned Circle for information.
3. The Head Teacher concerned School.
4. Office record file.


Sub Divisional Education Officer
(Male) Haripur

S No 2810



DBA NO. 530

BC No. 10-1377

Name of Adocate محمد رشید قسری

Head Clerk
District Bar Association
Abbottabad

وکالت نامہ

بعدالت جناب۔ سروس ٹریڈینگ خیر بھائی خاں خواہ لیسٹاور
 عنوان: راشد لوانہ بنام گورنمنٹ ڈائننگ روم خواہ وغیرہ
 منجانب: ایوانہ

نوعیت مقدمہ:

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آن مقام

محمد رشید قسری و کسب الیہا کے ہاں لیسٹاور خواہ لیسٹاور

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کمال اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ و تقریر نالٹ و فیصلہ بر حلف دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقریر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور وہی کے اختیار ہوں گے اور اس کا ساختہ پرداختہ مجھ کو منظور قبول ہوگا۔ دوران مقدمہ جو خرچہ و جہانہ التوا ہوگا اس کے استحقاق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا اور کوئی پیشی مقام دوزخ ہو یا جس سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار سرکردہ میں کوئی جزو بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد استجارت نالٹ بھینٹہ مفلسی کے دائرہ کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

الرقوم: 21/4/15

بمقام:

Accepted

(S. R. M.)

مخدوم جناب چوہدری حسین شہزاد شہزاد شہزاد

سوال :- ایجوکیشن سویل پورہ کیس کی دستبرداری
عدالت عالیہ
اپیل نمبر (364)

موردہ گزارش ہے کہ سائل نے ایئر ٹوائز PSH 2 کو پینٹ سٹریٹری کل منڈیوں
بصورت سویل پورہ مسائل کا سبب اور پینٹ سٹریٹری کل منڈیوں میں سویل پورہ
میں باہمی تنازعات کے ساتھ مہری ٹرانسفر آرڈر 31 اکتوبر 2015 کو
کو پینٹ سٹریٹری کل منڈیوں میں کروا جانے کا یہ درخواست کے ساتھ
اسٹیٹ پیپر گواہان اور SDEO مہار سویل پورہ کے ساتھ درخواست
موجود ہے لہذا اس میں اپیل نمبر 364 والی ہے۔

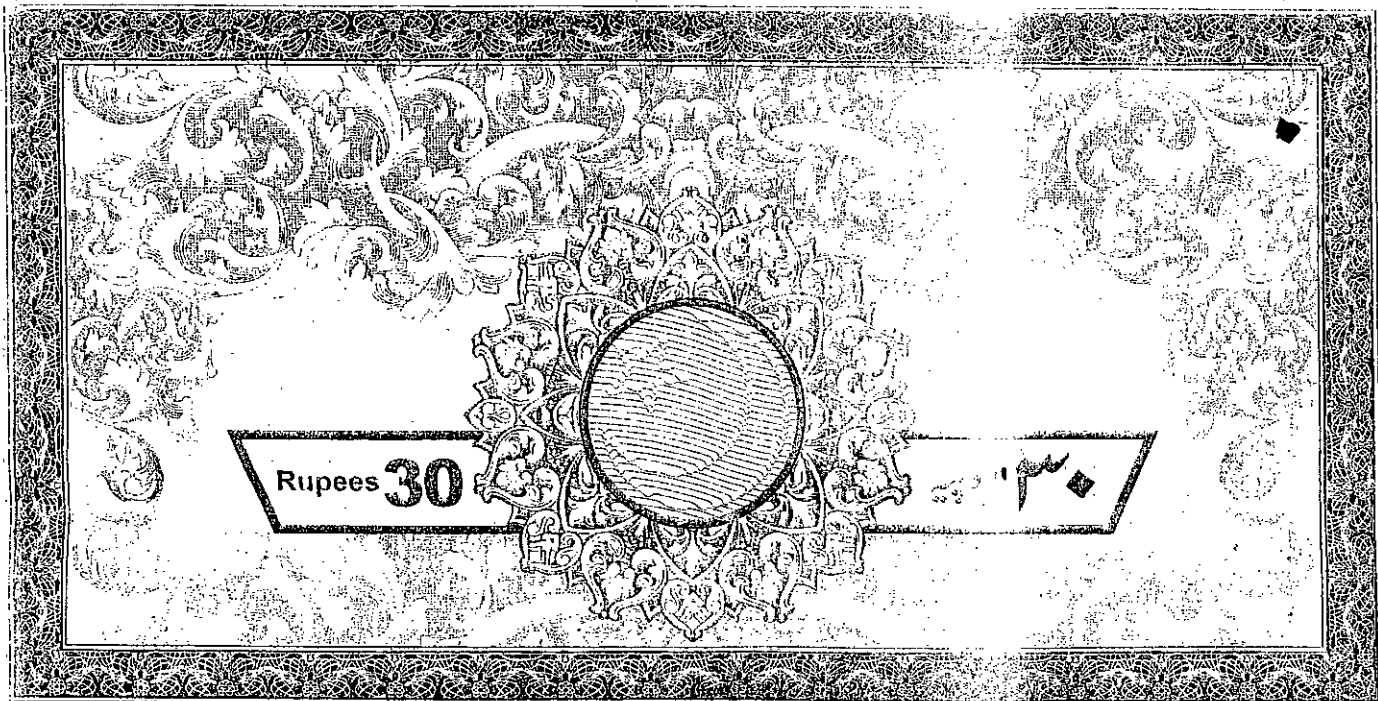
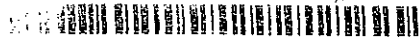
سائل کی پینٹ سٹریٹری کل منڈیوں کے حوالے سے

الفاظ

19/10/2015

PSH 2

ایئر ٹوائز PSH 2
کو پینٹ سٹریٹری کل منڈیوں میں سویل پورہ
2015/2015



بیان حلفی

میں دو لاکھ اسٹیمپس کے ساتھ PSHT اور راشڈ لواز PSHT
فنانس SDEO سب پر مبنی طور (مردانہ) کے ساتھ معاہدہ کرتے ہیں
کہ ہمیں ایک سو تیس ہزار روپے کی رقم ملے گی اور اسے ہمیں
بے دالین لیتے ہیں

اس معاہدہ پر کہ 31 اکتوبر 2015ء تک کسی راشڈ لواز PSHT
نیلاں جو تو کیا اور کسی نزدیکی سکول میں کیا جائے گا۔

لے پورٹ دیا گیا 31 اکتوبر 2015ء کے بعد خالص PSHT
SDEO

132 PS میں نیلاں جو تو کیا دیا جائے گا۔ اور راشڈ لواز SPHT
SDEO

کا اردو PS میں کر دیا جائے گا۔

Signature

SPHT
گواہ
31 اکتوبر 2015ء

راشد لواز
SPHT
نیلاں جو تو کیا
(۱۲۷۴۱۶)

SPHT
خالق محمود ننگہ باہ
7-439716-13302

SPHT
31 اکتوبر 2015ء
نیلاں جو تو کیا