


FORM OF ORDER SHEET

Court of _____

Appeal No. _____

1494/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	19/07/2023	<p>The appeal of Mr. Idrees Ahmad presented today by Mr. Imdad Ullah Advocate. It is fixed for preliminary hearing before Touring Single Bench at Swat on</p> <p>By the order of Chairman</p>  <p>REGISTRAR</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 1496 of 2023

Idrees Ahmad Chowkidar Government Primary School Kalam, District Swat

...Appellant

VERSUS

The Secretary Elementary and Secondary Education Department Government of
Khyber Pakhtunkhwa, Peshawar and Others.

...Respondents

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Appellant Through

Imdad
Imdad Ullah

Advocate Swat

Office: Khan Plaza, Gulshone Chowk,

Mingora Swat, Cell 0333 929 7746

Email: imdadswati@gmail.com

①

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 1494 of 2023

*Idrees Ahmad Chowkidar Government Primary School
Kalam, District Swat*

...Appellant

VERSUS

1. *The Secretary Elementary and Secondary Education Department Government of Khyber Pakhtunkhwa, Peshawar.*
2. *The Director Elementary and Secondary Education Government of Khyber Pakhtunkhwa, Peshawar.*
3. *The District Education Officer District Swat at Gulkada.*

...Respondents

**SERVICE APPEAL UNDER SECTION 4
OF THE SERVICE TRIBUNAL ACT, 1974
FOR TRANSFER OF THE APPELLANT
ON MEDICAL GROUNDS, FOR WHICH
PURPOSE THE APPELLANT
PREFERRED A DEPARTMENTAL
APPEAL, BUT THE SAME WAS NOT
RESPONDED TO DESPITE THE LAPSE
OF STATUTORY PERIOD OF TIME.**

PRAYER:

That on acceptance of this service appeal the Appellant my very kindly be transferred to GHS Shin or any other nearby school.

Respectfully Sheweth:

Facts:

- i. *That the Appellant was appointed as Chowkidar vide order Endst: No. 7896-8006/Class-IV Appointment-2022 dated 17-05-2022. Copy of the order dated 17-05-2022 is enclosed as Annexure "A".*
- ii. *That the Appellant assumed the charge and performed his duties to the best of his abilities and to the satisfaction of the authorities without any objections, whatsoever.*
- iii. *That the Appellant suffered from severe back pain and upon consultation the Appellant was prescribed surgery. Copies of the medical certificate is enclosed as Annexure "B".*
- iv. *That the Appellant submitted an application for leave on medical grounds duly supported by all the documents. The Appellant was granted medical leave from 05-10-2022 till 04-12-2022 vide order Endst: No. 1583-86/PF/C-IV dated 17-11-2022. Copy of the order dated 17-11-2022 is enclosed as Annexure "C".*
- v. *That after the expiry of the leave the Appellant was still unable to travel due to his medical*

condition, thus Appellant submitted an application for transfer to nearby school where the post of chowkidar was lying vacant, but to no avail. Copy of the vacancy certificate is enclosed as Annexure "D" and that of the application as Annexure "E", respectively.

- vi. That during the winter vacation there heavy snowfall which made travelling more cumbersome rather impossible and the Appellant was unable to attend the school.
- vii. That feeling aggrieved the Appellant submitted a departmental appeal for making transfer of the Appellant on medical grounds, but the same was not responded to despite the lapse of statutory period of time. Copy of the departmental appeal is enclosed as Annexure "F".
- viii. That still feeling aggrieved and having no other option this Honourable Tribunal is approached for the redressal of the grievances on the following grounds.

Grounds:

- a. That in accord with the policy of the Provincial Government an employee be compensated by way of adjustment / transfer in certain cases, but in case of the Appellant the same provision is not considered at all to the utter detriment of the Appellant, hence crating hardship for the Appellant and thus the

Appellant has not been treated in accordance with the law and rules.

- b. That this is a classic case of misuse and abuse of the authority and that too in a very classic, arbitrary and fanciful manner to the utter detriment of the Appellant.*
- c. That the Appellant has been discriminated in a very blatant manner.*

It is, therefore, very respectfully prayed that on acceptance of this service appeal the transfer of the Appellant be made to GHS Shin or any other nearby school.

Any other relief deemed appropriate in the circumstances and specifically prayed for may also very kindly be grated.

Appellant
Idrees Ahmad
Through Counsels,
Aziz-ur-Rahman
Imdad Ullah
Advocates Swat

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No: _____ of 2023

Idrees Ahmad Chowkidar Government Primary School
Kalam, District Swat

...Appellant

VERSUS

The Secretary Elementary and Secondary Education
Department Government of Khyber Pakhtunkhwa,
Peshawar and Others.

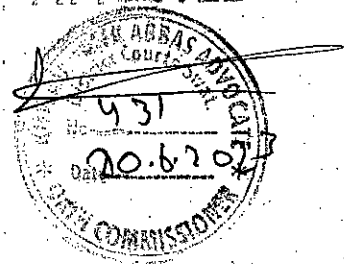
...Respondents

AFFIDAVIT

It is solemnly stated on Oath that all the contents of
this service appeal are true and correct to the best of my
knowledge and belief and nothing has either been
misstated or kept concealed before this Honourable
Tribunal.

Deponent

Idrees Ahmad

ATTESTED

431
20.6.2023
COMMISSIONER

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BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _____ of 2023

Idrees Ahmad Chowkidar Government Primary School
Kalam, District Swat

...Appellant

VERSUS

The Secretary Elementary and Secondary Education
Départment Government of Khyber Pakhtunkhwa,
Peshawar and Others.

...Respondents

ADDRESSES OF THE PARTIES

Appellant:

Idrees Ahmad Chowkidar Government Primary School
Kalam, District Swat

Respondents:

- 1. The Secretary Elementary and Secondary Education Department Government of Khyber Pakhtunkhwa, Peshawar.*
- 2. The Director Elementary and Secondary Education Government of Khyber Pakhtunkhwa, Peshawar.*
- 3. The District Education Officer District Swat at Gulkada.*

Appellant
Through Counsel,
Imdad Ullah
Advocate Swat



**DISTRICT EDUCATION OFFICER (MALE)
SWAT AT GULKADA**

Annexure **A**

PH No. 091-9240228

Fax 091-9240228

E-mail emisswat@gmail.com

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Appointment Order.

Consequent upon the recommendations of the Departmental Selection Committee (DSC) regarding the appointment of C-IVs held on 17/05/2022 under the Chairmanship of DEO (M) Swat and Representative of Secretary Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar, the undersigned is pleased to appoint the following candidates on regular basis as Class IVs against vacant/newly created posts at the schools/offices mentioned against their names in BPS-03 (Rs.9610-390-21310) plus usual allowances as admissible under the rules on regular basis, under the existing policy of the Provincial Government on the terms and conditions given below with immediate effect in the interest of public service.

CANDIDATES APPOINTED AGAINST DECEASED SON QUOTA (100%)

S.No	Name	Father Name	Residence	Date of Birth	Post	School where Posted	Remarks
1	Khalid Khan	Late-Yousaf Khan	Gowalirai	01-01-97	Naib Qasid	GHSS Bamakhela	A.V Post
2	Waqas Khan	Late-Layaq Bahadar	Bagh Dherai	01-01-03	Chowkidar	GHSS Fatehpur	A.V Post
3	Hasnain Khan	Late-Zahid Khan	Kandaw Kass	15-05-03	Chowkidar	GPS Kandaw Manglor	A.V Post
4	Usman Ali	Late-Muslim Badshah	Gharai Shamoza	05-01-97	Naib Qasid	GHSS Odigram	A.V Post
5	Arshad Ali Khan	Late-Mughal Baz Khan	Langar Khwazakhela	23-08-77	Chowkidar	GPS Sangrai	A.V Post
6	Naved	Late-Shamsul Hadi	Shagai Shagram	09-09-99	Chowkidar	GPS Fatehpur No.2	A.V Post
7	Aslam Zeb	Late-Javed	Ashar Garai Banjoot	18-02-99	Chowkidar	GPS Ashar Gharai	A.V Post

CANDIDATES APPOINTED AGAINST DISALE QUOTA (2%)

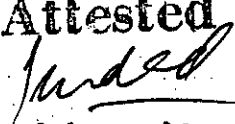
S.No	Name	Father Name	Residence	Date of Birth	Post	School where Posted	Remarks
1	Azhar Rahman	Rahman Nazir	Guligram	31-05-96	Chowkidar	GMS Sangota	A.V Post
2	Ibrahim	Raham Gul	Shingrai Manglor	20-02-83	Chowkidar	GPS No.2 Koza Bandai	A.V Post

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Advocate

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CANDIDATES APPOINTED AGAINST RETIRED SON'S QUOTA (25%)

S.No	Name	Father Name	Residence	Date of Birth	D/o retirement of father	Post	School where Posted	Remarks
1	Karimullah	Rahmani Gul	Gowalirai	03-01-82	31-10-02			
2	Ibrahim Khan	Abdul Karim	Bahrain	05-02-86	24-09-10	Chowkidar	GHSS Shakardara	A.V.Post
3	Fawad Ali Khan	Jamshoid Khan	Paladram	01-10-93	30-06-16	Chowkidar	GPS Koza Gharai	A.V.Post
4	Inamullah	Sawab Gul	Kas Qandil Madyan	01-01-98	31-12-16	Chowkidar	GPS Nawakalay Kihwaza Khela	A.V.Post
5	Sher Alam	Mohambar Khan	Charma Roringar Matta	01-01-81	02-01-17	Sweeper	GHS Chanchari	A.V.Post
6	Habibur-ur-Rahman	Pir Muhammad Khan	Saidu Sharif	03-06-89	11-02-17	Sweeper	GHSS Shakar Dara	A.V.Post
7	Suliman	Saiful Malook	Ganajir Charbagh	10-02-90	01-03-17	Sweeper	DDEO(M) Office Upper Swat	A.V.Post
8	Fazal Akbar	Sultan Sikandar	Pismai	01-04-83	31-03-17	Sweeper	GMS Roria	A.V.Post
9	Shams-ul-Israr	Sadiq Ahmad	Qambar	08-09-94	31-03-17	Sweeper	GMS Nowkhara	A.V.Post
10	Ahnan Khan	Mahabat Khan	Mingora	01-06-96	05-04-17	Chowkidar	GHS Bara Samai	A.V.Post
11	Muhammad Ali	Nazar	Nishkapor Kokarai	1982	06-04-17	Naib Qasid	GPS Penawrai	A.V.Post
12	Muhammad Abid	Muhammad Sajid	Chuprial Matta	15-01-93	30-06-17	Chowkidar	GHS Jambil	A.V.Post
13	Muhammad Imran	Itbar Gul	Faiz Abad	07-03-86	30-06-17	Chowkidar	GHSS Chuprial	A.V.Post
14	Javid Ali	Sultan Amriz	Malam Jabba	08-09-95	30-6-17	Chowkidar	GPS No.2 Soray Sharifay Kabal	A.V.Post
15	Zia Ullah	Inayat ullah	Manyar	25-10-95	30-06-17	Chowkidar	GPS Spine Oba	A.V.Post
16	Irfan Ullah	Rozi Gul	Islampur	20-12-96	30-06-17	Chowkidar	GHS Kottai	A.V.Post
17	Attaulah	Naseem Khan	Sakhra	10-03-99	30-06-17	Sweeper	GPS Sigram	A.V.Post
							GHS Sambat	A.V.Post

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Advocate

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18	Syed Muhammad Khan	Bakht Sher	Banjot mlalai	24-06-01	30-06-17	Chowkidar	GPS Soray Sar	A.V.Post
19	Israr Din	Umar Gul	Ushoo	10-02-92	16-08-17	Chowkidar	GHS Matiltan	A.V.Post
20	Muhibullah	Muhammad Zahir Shah	Deolai	09-09-96	14-08-17	Sweeper	GHSS Tall	A.V.Post
21	Ihsanullah	Alamgir	Balogram	12-03-90	13-09-17	Chowkidar	GHSS Odigram	A.V.Post
22	Ahmad Mustafa	Gul Rahman	Sakhra	01-01-04	22-09-17	Chowkidar	GPS Maizara Sakhra	A.V.Post
23	Idrees Ahmad	Muhammad	Benowrai	03-03-89	20-12-17	Chowkidar	GPS Kalam	A.V.Post
24	Muhammad Suliman	Muhammad Rasool Khan	Charbagh	01-08-99	29-12-17	Chowkidar	DDEO (M) Office Upper Swat	A.V.Post

[Signature]

CANDIDATES APPOINTED AGAINST OPEN QUOTA

Name	Father Name	Residence	Date of Birth	Post	School where Posted	Remarks
Gauhar Ali	Shah Zarin	Fatehpur	30-05-99	Chowkidar	GPS Tawde Oba	A.V.Post
Muhammad Nazar	Sherin Zada	Cham Garai	13-11-88	Chowkidar	GPS Aryanai No.1	A.V.Post
Raheemullah	Firdoos	Matiltan	20-08-02	Lab/Attendant	GHS Matiltan	A.V.Post
Abullais	Isfandiyar	Bahrain	20-02-04	Chowkidar	GPS Areen Daral	A.V.Post
Ziarat Gul	Sani Gul	Bahrain	10-01-89	Chowkidar	GPS Bar Najvi	A.V.Post
Abdul-Munem	Bacha Khan	Shalpin	01-01-86	Naib Qasid	GHSS Shalpin	A.V.Post
Karimullah	Said Ali	Jeshar Shalpin	01-01-97	Chowkidar	GPS Kharaway Shalpin	A.V.Post
Noor ul Islam	Ali Namdar	Shalpin	01-01-00	Lab/Attendant	GHSS Shalpin	A.V.Post
Rahim Zada	Saranay Khan	Lakhar	1986	Chowkidar	GHS Lakhar	A.V.Post
Gauhar Ali	Muhammad Ali	Miandam	25-09-98	Chowkidar	GHSS Miandam	A.V.Post
Zafar Ali	Rahmat Khan	Jano	01-01-88	Chowkidar	GHS Jano	A.V.Post
Sher Bahadar	Jehan Zeb	Urdam	01-01-91	Chowkidar	GPS Topsin	A.V.Post
Ubaidullah	Muhammad Qayum Khan	Jano	01-09-94	Chowkidar	GPS Asala Bala	A.V.Post
Farman Ali	Afsar Khan	Shalpin	25-03-96	Chowkidar	GHSS Shalpin	A.V.Post

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Advocate

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15	Fazal Rahman	Pir Kachkool	Rasha Gata	01-01-88	Chowkidar	GPS Rasha Gata	A.V.Post
16	Rahmat Ali	Bakht Nazir	Arbat Kokarai	01-01-94	Chowkidar	GPS Arbat Kokarai	A.V.Post
17	Adil Khan	Aqai Mand	Guligram	01-05-01	Naib Qasid	GHSS Shagai	A.V.Post
18	Suliman	Inzer Gul	Saidu Sharif	16-03-88	Lab/Attendant	GHSS Shagai	A.V.Post
19	Fawad Ali	Muhammad Nawab	Shahdara	27-03-92	Naib Qasid	GHS No.1 Mingora	A.V.Post
20	Javed Iqbal	Said Mashal	Saidu Sharif	10-03-85	Naib Qasid	GCMHSS Wadudia	A.V.Post
21	Sher Alam Khan	Abdul Majeed	Akhun Kalay	01-04-80	Chowkidar	GPS Akhunkalay	A.V.Post
22	Aftab Ali	Adalat Khan	Odigram	01-03-85	Lab/Attendant	GHSS Odigram	A.V.Post
23	Aziz Ahmad	Sher Zada	Odigram	10-05-94	Naib Qasid	GHSS Odigram	A.V.Post
24	Umar zada	Nazir Gul	Tindodag	01-01-84	Chowkidar	GHS Tindodag	A.V.Post
25	Junaid Khan	Mir Hamzala	Kabal	18-05-94	Chowkidar	GPS Kabal	A.V.Post
26	Bacha Khan	Nadar Khan	Kabal	01-01-85	Chowkidar	GPS Chindakhwara	A.V.Post
27	Usman Ali	Muhammad Sher Ali Khan	Mahak	15-05-94	Naib Qasid	GMS Mahak	A.V.Post
28	Daftar Ali	Muhammad Arif	Manja	1-1-2000	Chowkidar	GPS Manja	A.V.Post
29	Khan Nawab	Talimand	Shah Dehrai	04-01-86	Naib Qasid	GHS Asharay	A.V.Post
30	Shah-E- Room	Shultani Room	Shah Dehrai	15-03-96	Chowkidar	GPS Shah Dehrai	A.V.Post
31	Attaullah	Khan Gul	Mahak	08-06-94	Sweeper	GMS Mahak	A.V.Post
32	Rahimullah	Fazal Qayum	Sirsina	15-04-82	Chowkidar	GPS Sirsina	A.V.Post
33	Khan Nawab	Malak Nawab	Shakardara	25-04-84	Lab/Attendant	GHSS Shakardara	A.V.Post
34	Imran Khan	Umar Ghani	Shakardara	01-03-01	Lab/Attendant	GHSS Shakardara	A.V.Post
35	Muhammad Akram	Nizamuddin	Shakardara	01-01-89	Chowkidar	GHSS Shakardara	A.V.Post
36	Latifur Rahman	Inayatur Rahman	Shakardara	11-02-91	Naib Qasid	GHSS Shakardara	A.V.Post
37	Habib Ahmad	Amir Bashir	Dehrai Kabal	1983	Naib Qasid	GHSS Shakardara	A.V.Post
38	Iftikhar Ali	Akhun Jan	Shangwatai	01-01-90	Chowkidar	GPS Shangwatai	A.V.Post

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[Signature]
Advocate

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Shah Mansoor	Muhammad Ayub Khan	Labat Matta	10-03-00	Naib Qasid	GHSS Labat Matta	A.V.Post
Noor Alam	Muhammad Uzair	Roringar	10-10-03	Sweeper	GHS Roringar	A.V.Post
Rahman Ali	Dilaram Khan	Gat	01-11-00	Lab/Attendant	GHSS Gat Shawar	A.V.Post
Ahmad Hussain	Bacha Was Khan	Gat	01-01-90	Naib Qasid	GHSS Gat Shawar	A.V.Post
Majidullah	Rahmatullah	Gat	01-01-82	Chowkidar	GHSS Gat Shawar	A.V.Post
Muhammad Hussain	Bakht Rawan	Pansat	01-01-83	Chowkidar	GPS Pansat	A.V.Post
Mohabat Khan	Gul Faraz Khan	Gardam	03-01-91	Chowkidar	GPS Gardam	A.V.Post
Suliman Khan	Sarzamin Khan	Tootkay Matta	13-02-94	Naib Qasid	DDEO(M) Office Upper Swat	A.V.Post
Muhammad Maaz Khan	Pir Muhammad Khan	Tootkay Matta	01-11-01	Naib Qasid	DDEO(M) Office Upper Swat	A.V.Post
Naik Zada	Masoom Khan	Kharirai Matta	23-03-91	Naib Qasid	DDEO(M) Office Upper Swat	A.V.Post
Qaribullah	Bacha Hayat	Bara Bama Khela	03-01-00	Naib Qasid	DDEO(M) Office Upper Swat	A.V.Post
Zahoor Khan	Taj Muhammad Khan	Tootkay Matta	20-10-01	Chowkidar	DDEO(M) Office Upper Swat	A.V.Post
Ziyarat Khan	Khkulay Khan	Kharirai Matta	01-01-88	Naib Qasid	GHSS Matta	A.V.Post
Fawadullah	Shujat Ali	Tootkay Matta	01-01-00	Chowkidar	GHSS Matta	A.V.Post
Barkatullah	Muhammad Rahim	Ragastoon	10-03-99	Naib Qasid	GMS Ragastoon	A.V.Post
Akhtar Muhammad	Din Muhammad	Ragastoon	20-03-61	Sweeper	GMS Ragastoon	A.V.Post
Musa Khan	Mian Mehmood	Bodigram	05-05-94	Naib Qasid	GMS Said Abad	A.V.Post
Amani Room	Shah Room Bacha	Bodigram	01-01-85	Sweeper	GMS Said Abad	A.V.Post
Habibun Nabi	Zarawar Khan	Awisha	18-02-99	Sweeper	GMS Awisha	A.V.Post
Fazal Rabi	Yousaf Khan	Awisha	05-02-03	Naib Qasid	GMS Awisha	A.V.Post

Attested
[Signature]
Advocate

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59	Bacha Zada	Karim Jan	Madiyat Asharay	01-10-01	Naib Qasid	GMS Madiyat	A.V.Post
60	Jamal Nasar Khan	Bashir Ahmad Khan	Nawkhara	05-08-00	Naib Qasid	GMS Nawkhara	A.V.Post
61	Umar Ghani	Fazal Ghani	Sambat Cham	01-01-81	Chowkidar	GPS Rahim Abad Sambat	A.V.Post
62	Shafiullah	Khwass Faqir	Roringar	01-12-99	Chowkidar	GPS Saidara	A.V.Post
63	Tariq Ahmad	Muhammad Tahir	Qazi Abad Sakhra	12-03-97	Naib Qasid	GHSS Sakhra	A.V.Post
64	Aftab Ahmad Khan	Nisar Ahmad Khan	Chuprial	17-02-86	Lab/Attendant	GHSS Chuprial	A.V.Post
65	Ahmad Ali	Khan Zada	Chuprial	15-04-99	Naib Qasid	GHSS Chuprial	A.V.Post
66	Muhammad Umar	Bakht Umar	Gharai Chuprial	01-03-91	Naib Qasid	GHSS Chuprial	A.V.Post
67	Zahid Ullah	Sher Faroz Khan	Koza Durashkhela	01-10-98	Sweeper	GMS Koza Durashkhela	A.V.Post
68	Iqbal Hussain	Ghulam	Malta	03-12-97	Chowkidar	GPS Deran Patay	A.V.Post
69	Bakht Baidar	Raham Bacha	Tootkay Matta	12-03-94	Lab/Attendant	GHSS Matta	A.V.Post
70	Muhammad Younas	Ali Yar	Durashkhela	01-01-99	Lab/Attendant	GHSS Durashkhela	A.V.Post

CONSEQUENTIAL ORDER

S.No	Name	Present posting	Adjusted at	Remarks
1	Jibrani Khan Chow	GPS Areen Daral	GPS Lagan	A.V.Post
2	Abdul Akbar Sweeper	GMS Roria	GMS Madiyat	A.V.Post
3	Rafiullah Chow	GHS Chancharay	GPS Galsha	A.V. Post
4	Hazrat Ali Chow	SDEO (M) Office Kabal	GHSS Shgai	A.V. Post
5	Aziz Ahmad Chow	GPS Koza Gharai Bahrain	SDEO (M) Office Kabal	Against S.No-04

TERMS & CONDITIONS.

- 1- No TA/DA is allowed.
- 2- Charge report should be submitted to all concerned.
- 3- They would be governed by such Rules and Regulations as may be issued from time to time by the Government.

Attested
[Signature]
Advocate

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- 4- Their services can be terminated at any time in case of their performance is found unsatisfactory during probation period, in case of misconduct, they shall be proceeded under the Rules framed from time to time by the Government.
- 5- Their services are liable to be terminated on one month prior notice from either side, in case of resignation without prior notice one month pay and allowances, shall be forfeited in favor of Government through Challan.
- 6- They should join their posts within 15 days of the issuance of this order positively otherwise the appointment order shall be stand cancelled.
- 7- The Principal's / SDEO's / Head Masters concerned should personally check their original documents, domicile, CNIC before handing over charge and if any discrepancy OR ambiguity found in their credentials OR they are not available in person, the same shall be reported to the District Education Officer immediately.
- 8- Health & age Certificate shall be signed by the DDO concerned with her name & original designation and then after Medical Superintendent and the same should be provided before taking over charge.
- 9- Their age should not be less than 18 years and exceed 40 years and if any such like case found the same may be reported to the undersigned and charge may not be handed over. Moreover, the upper age limit has already been relaxed by Govt. of Khyber Pakhtunkhwa SOE-III (E&AD) 2-1 / 2007 dated: the 09th December, 2010 up to three years for backward areas.
- 10- The concerned DDO will be bound to provide duty / joining certificate within fifteen days positively otherwise the concerned DDO (Principal's / SDEO's / Head Masters) will be personally responsible for consequences as well as litigation if any.
- 11- In case of any discrepancy in documents, oversight or clerical mistake, the Competent Authority has the power to modify or withdraw appointment order of the official concerned according to rules/policy.
- 12- Errors and omissions will be acceptable within the specified period.

(MUHAMMAD RIAZ)
District Education Officer (M)
Swat

Endst: No. 7896-8006/Class-IV Appointment-2022

Dated 17/05/2022.

Copy forwarded for information and necessary action to the: -

1. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
2. The District Comptroller of Accounts Swat at Saidu Sharif
3. District Monitoring Officer Swat
4. Concerned Principals/ Head Masters/SDEOs.
5. EMIS Cell Local Office.
6. PA to District Education Officer (M) Swat.
7. Officials concerned.
8. Office File.

District Education Officer (M)
Swat

Attested
[Signature]
Advocate



SWAT EDUCATION DEPARTMENT

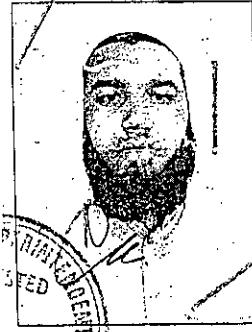
Department of Elementary & Secondary Education, Swat.
Govt. of Khyber Pakhtunkhwa.

Tel: 0946-9240209 - 9240228
Web: www.sed.edu.pk
Online Portal: www.swateducation.com
Email: swateducation@gmail.com

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Khyber Pakhtunkhwa

MEDICAL CERTIFICATE



Name of Official: IDREES AHMAD

Official's Name: MUHAMMAD

No.:

1	5	6	0	2	-	6	8	5	4	5	7	6	7
---	---	---	---	---	---	---	---	---	---	---	---	---	---

Age taking on Post: Chowkidar Caste or Race: Afghans Blood Group: AB⁺

Residence: Village Benorai P/O Fatehpur Tehsil

Kulwaja Khela Swat Contact No. (if any) 03454331130

Date of Birth: (in figure) 03/03/1989 (in words) March 3, N-H & Eighty nine

Height by measurement: 5ft 7" Personal mark of Identification: nil

Signature of the Official:

Seal & Signature
District Education Officer
Swat, KP Pakistan

Date: 19/5/2022

FOR MEDICAL SUPERINTENDENT OFFICER USE ONLY

I do hereby certify that I have examined Mr. / Miss. IDrees Ahmad a candidate for employment in the office of District Education Department Swat and cannot discover that he/ she had any disease communicable or other constitutional affection or bodily infirmity except: Fit

I do not consider this as disqualification for employment in the office of District Education Department Swat. His age according to his own statement/documents is 33 years and by appearance about 33 years.

Remarks (if any): _____

Left Hand Fingers Impressions of official



Medical Superintendent,
Saidu Sharif Hospital Mingora,
Swat, KP Pakistan

20/5/22

Note: two copies of this Medical Certificate are require, each for Hospital Record and other for Department Record.
Published by Swat Education Department Swat. www.sed.edu.pk, swateducation@gmail.com, 0300 90 3 4 5 6 7

Attested

Advocate

DEPARTMENT OF PATHOLOGY

Saidu Group of Teaching Hospital, Saidu Sharif, Swat.

MEDICAL INVESTIGATION REPORT

Name: IDREES AHMAD Friday, May 20, 2022

TEST RESULT

HBs Ag Screening _____ Negative.

HCV Ab Screening _____ Negative.

URINE R/E

Physical Examination

Color _____ P. Yellow Sp: Gravity _____ 1.015

Chemical Examination

Albumin _____ Nil Sugar _____ Nil

Bile Salt _____ Nil Bile Pigment _____ Nil

Microscopic Examination

Pus Cells _____ 01 - 02/HPF. RBC's _____ 00 - 01/HPF.

Bow

Pathologist.

Saidu Group of Teaching
Hospital, Saidu Sharif Swat.

Attested
Mudaf
Advocate

OUT DOOR PATIENT TICKET

CIVIL HOSPITAL MADYAN SWAT

16

District SWAT

Date 5/10/2022

CRP No: 1436

Annexure B

Sent To: _____

Name Idrus Ahmad Age: _____ Sex: _____

Father's / Husband's Name _____

Monthly OPD Serial No. _____

Provisional Diagnosis: _____

History	Clinical Findings / Investigations / Treatment / Referred / Test Findings
<p>Hx of Hydrocele 9 I/D for infected Hydrogel wound left open</p>	<p>Delayed primary closure & daily wash + ASD</p>
<p>Diagnosis: For Kindly daily wash & wash.</p>	<p>Kindly daily wash & wash. Home rest 2 - months</p>

Signature
5/10/2022
District Health Officer
Swat Distt: at Gulkada.

Handwritten notes in Urdu script.

Deputy Medical Superintendent
Saidu Teaching Hospital
Saidu Sharif, Swat

2 - months
Dr. HUSAM UD DIN
Medical Officer
Civil Hospital Madyan

Doctor Name & Signature

D-170

Attested
Signature
Advocate



OFFICE OF THE
DISTRICT EDUCATION OFFICER (MALE)
DISTRICT SWAT

Tel: (0946) 92-10228
Email: deosw@swat.gov.pk

F: (0946) 92-10228
Web: www.swat.gov.pk

Annexure - C

17

GRANT OF MEDICAL LEAVE

In exercise of powers delegated to the District Education Officer vide Director Elementary Secondary Education Khyber Pukhtunkhwa, Peshawar No. 6965/7015/F.No. 22-D/Leave Cases/KP dated 23-07-2017.

Sanction is hereby accorded to the grant of Medical leave with effect from 05-10-2022 to 04-12-2022 (60 days) on full pay in r/o Mr. Idrees Ahmad Chowkidar GPS, Kalam District Swat as due and admissible to him under the leave rules 1981.

Necessary entries to this effect should be made in his Service Book and leave account form which is returned herewith.

(MUHAMMAD RIAZ)
DISTRICT EDUCATION OFFICER (M)
SWAT

Endst. No. 1583-26/JRF/C-IV Dated: 17-11/2022

Copy forwarded to:

- 1- The District controllers of Account Swat at Saidu Sharif.
- 2- The SDEO (M) Bahrain Swat w/r to his letter No. 1386 dated 05/10/2022 with the remarks that Convince allowance for the above mention period may be deposit in Govt. Treasury through Challan under intimation to the undersigned and SDEO (M) Bahrain is further directed to direct Head Teacher to make arrangement of School security.
- 3- P.A to District Education Officer (M) Swat the local office.
- 4- The official concerned.

DISTRICT EDUCATION OFFICER (M)
SWAT

Attested
[Signature]
Advocate

Govt High School Shin Swat



Annexure ^D

18

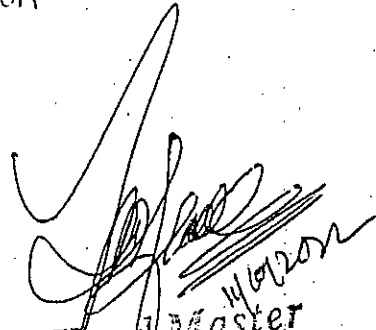
Ref. No: 278

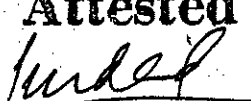
Date: 11/10/2022

Vacancy Certificate:

It is certified that the post of Naib Qasid is vacant at GHS Shin since 10th Oct, 2022, and you are requested to fill it on need basis.

Thank you very much.


Head Master
GHS Shin Swat

Attested

Advocate

حکومت سوات ۱۹۱۵ء اور ۱۹۱۶ء (میراٹھ) سوات
معاون: درہنوا سوات بہار سوات

Annexure "E"

۱۹۱۵ء

(19)

گزارش خدمت اقدس میں یہی مآتی ہے کہ سائل گورنمنٹ پرائمری سکول کلام
میں بحیثیت جو کبھی کبھی فرانس میں سرانجام دینا ہوں۔ یہاں والا میرا
کلام سے لیت دور ہے۔ میری سوات ۱۹۱۵ء نوٹری لویس کو سکول فتح پور میں ہے جو
کلام میں میں کفایتی مسات پر ہے۔ میں اس وقت کلکتہ میں درج
ہاں والا میں گزشتہ دنوں سوات بہار ہوا تھا اور ڈاکٹرز نے مشورہ دیا کہ
اپریشن کے بغیر علاج ممکن نہیں تو میں صحت لیگل لیو Leave میں اپریشن
کیا اور اب بھی صحت لیگل میں ہوں۔

لہذا میری تکلیف کو مد نظر رکھتے ہوئے اگر میرا سائل دیکھیں بھی قرین سکول
کو تاحیات دعا گور ہوں گا مستحق

Principal in Charge
SDEO (M) Bahraich
13/10/2022

Sayed Akhbar Akh
Sub-Divisional Edu. Officer (M)
Bahraich Circle Swat

الکرام

آپ کا نام لکھا

ادریس احمد ولد محمد سائے نوٹری
۱۷۱ فتح پور سوات جو کبھی کبھی کلام سوات

میراٹھ

۱۹۱۵ء

Focusing on
Jun (SDEO (M)
۱۷۱

Sd/Dir. M. Officer (M)
Bahraich Swat

22/10/2022

Attested
Advocate

حکومت جناب میٹر ٹری ایجوکیشن حیدرآباد خواہ
عنوان: درخواست تبادلا سے بار ہوا تبادلات کا نام

20

صاف عالی

گزارش خدمت اندر میں میں نے کہا ہے کہ سائل گورنمنٹ ایجوکیشن سیکولر کالام میں
حیثیت جو کبلا رہے ہیں۔

یہ کہ میں گاؤ بیٹری یونین کو سنبھال کر پورے تحصیل خوارہ خیلہ کا مستقل باشندہ ہوں
جو کہ کالام سے سینٹرو (کے) کے لیے فاصلے پر ہے۔ اس لیے سیکولر کی وجہ سے سب سے
کئی متاثر ہو چکی ہے اور میرا ایجنڈا بھی ہے۔
یہ کہ مجھے آن جان میں شدید تکلیف کا سامنا ہے۔

بلکہ میرے تکلیف کو مد نظر رکھتے ہوئے تبادلا حالیہ ہی میں
گورنمنٹ ہائی سکول شین میں خالی ہو نیوالے نائب قاعد کی جگہ کرائی جائے
تو وہ تاحیات دعاگو رہوں گا فقط
العارضی

DFDCM)
Muzt

For n/a as per
Law (in)

SECRETARY
Elementary & Secondary Edu. Deptt.
Government of Khyber Pakhtunkhwa

آپ کا نام و زمان
اور اس احمد ولد محمد (موصوف)
PPS کالام
سائن گاؤ بیٹری یونین خوارہ
تحصیل خوارہ خیلہ سوات

Attested
Advocate



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR.

No. 6589 /F.No. 451/A-20/C-IV/Swat Vol-7

Dated Peshawar the 07-11 /2022

Phone: 091-9225344

Email: ddadm.e@gmail.com

To

(21)

The District Education Officer
(Male) Swat

Subject: **APPLICATION FOR TRANSFER**

Memo:

I am directed to refer to the subject noted above and to enclose herewith an application in r/o Mr. Idress Ahmad Chowkidar GPS Kalam for further necessary action being competent authority please.

[Handwritten Signature]
7/11/22

Assistant Director (Admn)
Directorate E& Secondary Education
Khyber Pakhtunkhwa, Peshawar

Endst; No. _____

Copy forwarded to the: -

1. Applicant Concerned.
2. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.

[Handwritten Signature]
7/11/22

Assistant Director (Admn)
Directorate E& Secondary Education
Khyber Pakhtunkhwa, Peshawar

Attested

[Handwritten Signature]
Advocate

DA

BEFORE THE DIRECTOR ELEMENTARY AND SECONDARY EDUCATION
GOVERNMENT OF KHYBER PAKHTUNKHWA, PESHAWAR

Idrees Ahmad Chowkidar Government Primary School Kalam, District Swat.

-----Appellant

VERSUS

The District Education Officer (M) at Gulkada, District Swat.

-----Respondent

Subject: **Departmental appeal for transfer on medical reason.**

Respected Sir,

The Appellant submits as under:-

That the Appellant was appointed chowkidar on 17-05-2022 and joined his duties.

That the Appellant got back problem and the doctor prescribed surgery for the problem.

That the Appellant submitted his medical report to the office and also an application for medical leave.

That the application was allowed and the Appellant was granted medical leave with full pay with effect from 05-10-2022 to 04-12-2022 (60 days).

That the Appellant submitted application to the DEO (M) for transfer because of his surgery and that he can't travel because of road condition.

That the DEO (M) did not considered his application also that the Appellant also got the vacancy certificate from the headmaster GHS Shin.

That the Appellant has got a real back problem and he is unable to travel the long distance of about 65 kilometers daily.

It is thus very humbly requested that on acceptance of this departmental appeal and having sympathy the transfer of the Appellant may be considered on medical side and human side both.

Attested
[Signature]
Advocate

[Signature] Appellant
Idrees Muhammad

21/3/2023

In the matter of:-

idress Ahmad

Appellant

VERSUS

Govt of P. P. K. O/Tm Respondent

KNOWN ALL to whom these present shall come that I/we, the undersigned appoint

AZIZ-UR-RAHMAN and IMDAD ULLAH

Advocates High Court

To be the advocate for the Appellant in the above mentioned case to do all the following acts, deeds and things or any one of them, that is to say:-

- ❖ To acts, appear and plead in the above mentioned case in this court or any other Court in which the same may be tried or heard in the first instance or in appeal or review or revision or execution or at any other stage of its progress until its final decision.
- ❖ To present pleadings, appeals, cross objections or petitions for execution review, revision, withdrawal, compromise or other petition or affidavits or other documents as shall be deemed necessary or advisable for the prosecution of the said case in all its stages.
- ❖ To withdraw or compromise the said or submit to arbitration any difference or dispute that shall arise touching or in any manner relating to the said case.
- ❖ To receive money and grant receipts therefore, and to do all other acts and things which may be necessary to be done for the progress and in the course of the prosecution of the said case.
- ❖ To employ any other Legal Practitioner authorizing him to exercise the power and authorities hereby conferred on the Advocate wherever he may think fit to do so.
- ❖ I understand that the services of aforesaid lawyer are hired irrespective of the outcome of the case.

And I/We hereby agreed to ratify whatever the advocate or his substitute shall to do in the said premises.

And I/We hereby agree not to hold the Advocate or his substitute responsible for the result of the said case in consequences of his absence from the Court when the said case is called up for hearing.

And I/We hereby agree that in the event of the whole or any part of the fee agreed by me/us to be paid to the Advocate remaining unpaid, the Advocate shall be entitled to withdraw from the prosecution of the case until the same is paid.

IN THE WITNESS WHEREOF I/WE hereunto set my/our hand(s) to these present the contents of which have been explained to and understood by me/us, this 2 day of 03 2023

(Signature or thumb impression)

(Signature or thumb impression)

(Signature or thumb impression)

Accepted subject to terms regarding fees

(AZIZ-UR-RAHMAN)

Advocate High Court

Office: Khan Plaza, Gulshone Chowk

G.T. Road Mingora, District Swat.

(IMDAD ULLAH)

Advocate High Court

Office: Khan Plaza, Gulshone Chowk,

G.T. Road. Mingora. District Swat.