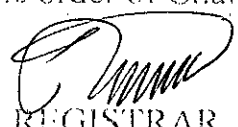


15/08/2023

FORM OF ORDER SHEET

Court of Justice Mr. Muhammad Jamshed Kundi Advocate at Peshawar

Appeal No. 15 dated 15/08/2023 at Peshawar

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3 By the order of Chairman
1-	15/08/2023	<p>The appeal of Mr. Ghulam Sadig is presented today by Muhammad Jamshed Kundi Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on</p> <p style="text-align: right;">By the order of Chairman</p> <div style="text-align: center;">   <b>REGISTRAR</b> </div>

**BEFORE THE CHAIRMAN KHYBER PUKHTUNKHWA**  
**SERVICE TRIBUNAL PESHAWAR**

In Re S.A No. 1659 /2023

**Ghulam Sadiq S/O Ghulam Noman SDEO (M) Sub Division Bahrain, District  
Swat, R/O Tehsil & Village Bahrain District Swat.**

**VERSUS.**

**Government Of Khyber Pukhtunkhwa.**

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01	Grounds of Petition.		01-05
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03	Certificate		07
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07	Copy of Notification Dated 15-09-2021	"A"	11
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1

**BEFORE THE CHAIRMAN KHYBER PUKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR**

Appeal No. 1659 /2023

Ghulam Sadiq S/O Ghulam Noman SDEO (M) Sub Division Bahrain, District Swat, R/O Tehsil & Village Bahrain District Swat.

.....Appellant.

Versus.

1. The Govt. of Khyber pukhtunkhwa through Secretary Elementary & Secondary Education.
2. The Director E. & S. E. Department Khyber pukhtunkhwa Peshawar.
3. The District Education Officer (M), Swat.
4. Shamsad Khan SST (G), GHS Qandeel Tehsil Bahrain District Swat.

.....Respondents

**Service appeal under section 4 of service tribunal Act, 1974 against the impugned order Endst No. SO (MC) E&SED / 4-16/2023/ Posting/Transfer/ MC / TC dated 04-05-2023 whereby the appellant has illegally and on the basis of political motivation transferred from the post of SDEO Bahrain and against the no action taken on the departmental appeal of the appellant despite lapse of statutory period.**

**PRAYER:**

On acceptance of this service appeal the impugned order dated 04-05-2023 and 15-05-2023 may kindly be set aside and the same be declared as illegal unlawful and based on political motivation and melafide. Any other remedy which this August Tribunal deems fit that may also be awarded in favor of the appellant.

Respectfully Sheweth:

**ON FACTS:-**

- 1) That the appellant was posted as SDEO (M) at Bahrain vide Notification No. SO (SM) D&SED / 7-1 / 2021 /PT/G/MC. Dated September 15, 2021.  
(Copy of the Notification Dated 15-09-2021 is attached as annexure "A").

1

**BEFORE THE CHAIRMAN KHYBER PUKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR**

**Appeal No. \_\_\_\_\_ /2023**

**Ghulam Sadiq S/O Ghulam Noman SDEO (M) Sub Division Bahrain, District  
Swat, R/O Tehsil & Village Bahrain District Swat.**

.....Appellant.

**Versus.**

- 1. The Govt. of Khyber pukhtunkhwa through Secretary Elementary & Secondary Education.**
- 2. The Director E. & S. E. Department Khyber pukhtunkhwa Peshawar.**
- 3. The District Education Officer (M), Swat.**
- 4. Shamshad Khan SST (G), GHS Qandeel Tehsil Bahrain District Swat.**

.....Respondents

**Service appeal under section 4 of service tribunal Act, 1974 against the  
impugned order Endst No SO (MC) E&SED / 4-16/2023/**

**Posting/Transfer/ MC / TC dated 04-05-2023whereby the appellant has  
illegally and on the basis of political motivation transferred from the  
post of SDEO Bahrain and against the no action taken on the  
departmental appeal of the appellant despite lapse of statutory period.**

**PRAYER:**

**On acceptance of this service appeal the impugned order dated 04-05-2023 and 15-05-2023 may kindly be set aside and the same be declared as illegal unlawful and based on political motivation and melafide. Any other remedy which this August Tribunal deems fit that may also be awarded in favor of the appellant.**

**Respectfully Sheweth:**

**ON FACTS:-**

- 1) That the appellant was posted as SDEO (M) at Bahrain vide  
Notification No. SO (SM) D&SED / 7-1 / 2021 /PT/G/MC,  
Dated September 15, 2021.  
(Copy of the Notification Dated 15-09-2021 is attached as  
annexure "A").**

(2)

- 2) That Since time of posting the appellant has been performing his duties efficiently to the best of his abilities and with full Zeal and zest to the entire satisfaction of his superiors nobody has raised any objection against the performance or working capacity of the appellant.
- 3) That during pre mature tenure of appellant on above mention place of posting a Notification was issued by respondent No. 1 on 4<sup>th</sup> May, 2023 whereby respondent NO 4 Mr. Shamshad SST Kabal Swat was transferred and posted as SDEO (M) Bahrain in OPS against vacant Post (AVP).  
**(Copy of impugned notification dated 04-05-2023 is attached as annexure "B").**
- 4) That another notification was issued by respondent No. 2 Vide Endst. No 2362-65F.No 263/ADEOs/ Transfer Swat whereby the Respondent No. 04-Shamshad SST was transferred from GHS Qandeel and posted at Bahrain as ASDEO against Khadim Shah the then ASDEO Bahrain.  
**(Copy of Notification is attached as annexure "C").**
- 5) That thereafter another notification was issued from the office of respondent No. 01 having same notification No and Date as annexure "A" correcting the name of the respondent No. 4 Shamshad Khan while the services of the appellant were placed at the disposal of directorate and again made a mistake in writing the designation of respondent no. 4 mentioning as ASDEO Kabal instead of SST GHS Qandeel.  
**(Copy of notification is attached as annexure "D").**
- 6) That thereafter corrigendum order was issued vide Notification No. SO(MC)E&SED/4 – 16 / 2023 / Posting / Transfer / MC / TC Dated 15<sup>th</sup> May 2023 with partial modification of an early Notification issued on 04-05-2023 in respect of the respondent No 4 correcting his designation and posting as SDEO ( OPS ) against the vacant post of SDEO (M) Bahrain.  
**(Copy of corrigendum is attached as annexure "E").**
- 7) That District Education Officer (M) Swat has also submitted a request to honorable director/ secretary Elementary & Secondary Education Vide Letter No. 1942-1943-45 to withdraw the transfer Notification of respondent No. 04 by mentioning a solid reason of Non availability of vacant post of SDEO Bahrain.  
**(Copy of request & Notification are attached as annexure "F" & "G").**

- 8) That the appellant submitted departmental appeal in the office of Secretary Elementary & Secondary Education for the Cancellation of notification but till expire of statutory period no response was paid to the appeal of appellant.  
(Copy of diary No. 1199 Dated 10-05-2023 is attached as annexure "H").

**GROUND:**

- 1) That the transfer notification bearing No. SO(MC) E&SED/4-16/2023/ Posting / Transfer / MC /TC, Dated 4<sup>th</sup> May, 2023 and 15-05-2023 of the respondent no. 01 is against the law, rules, based on political interference and against the principal of natural justice.
- 2) That the appellant is having past experience for the said post (also served as ASDEO for more than four years i.e. from 25-01-2014 to 25-5-2018) While the respondent No. 04 has got no such experience for the post of SDEO.
- 3) That the appellant is serving in BPS-17 while the respondent is serving in BPS-16 (not eligible for the post). This is the reason that the respondent No. 04 is posted in OPS.
- 4) That the posting order as ASDEO Bahrain and SDEO Bahrain on the same day and date by Two different Notifications: one by Directorate of Elementary & Secondary Education and the other by Secretary Elementary & Secondary Education clearly shows that the posting order of the respondent is made on political ground, otherwise there was no justification for transfer of suitable, fit and competent officer before completion period of tenure and to post an unfit, inexperienced and low scale officer.
- 5) That the requisite scale for the post of SDEO (M) is BPS-17, while respondent NO. 2 are serving in BPS-16.  
(Copy of Budget Sanctioned post of SDEO (M) is attached as annexure "I").
- 6) That respondent No. 4 has no past experience & Scale of the post of SDEO (M), Bahrain as the respondent is currently serving as SST (G), in BPS-16. While the appellant is having past experience for the same post and pay scale is BPS-17.  
(Copy of Experience is attached as annexure "J").

(4)

- 7) That it smacks melafide on the part of respondent department that in order to please the blue eyed employed. I.e. respondent no. 4, they show that the post of SDEO (M) Bahrain is vacant and deliberately misguided the authorities by concealing the fact that the appellant is working on the said post of SDEO (M) Bahrain.
- 8) That in order to justify the illegal transfer and posting order of respondent No. 04, In the notification issued from the office of Secretary Elementary & Secondary Education Khyber pukhtunkhwa respondent No. 01, the name and post of the respondent No. 04 Mr. Shamshad Khan SST GHS Qandeel were wrongly shown as ASDEO Kabal. Such glaring and blatant illegality and out of the way favor is ineffective upon the rights of the appellant and such practice is liable to be curbed to ensure transparency and upheld the merit.
- 9) That the impugned order dated 04-05-2023 is not passed in public interest which is clear violation of judgments passed by the apex supreme court of Pakistan hence the impugned order dated 04-05-2023 and 15-05-2023 is void abinitio in its nature.
- 10) That the transfer of the appellant is against the tenure. Needless to mention here that Appointment, promotion and posting/transfer are playing important role in the service career of government servant. The same being part and parcel of the term and condition of service, therefore such orders could not be made in deviation of law in the field or to be based on favoritism, Sifarish or considerations other than merit. In such circumstance civil servant will not be able to perform his duties with free mind, efficiently or peace of mind. He will get discourage which is not in favor of public interest. In this regard reliance has been placed upon Constitution petition No. 23/2012. Petition titled as Ms. Anita Turab Vs Government of Pakistan etc.
- 11) That the appellant had been posted as SDEO (M) Bahrain on September 15<sup>th</sup>, 2021 and hasn't yet completed his two years tenure on the same post. Pre mature transfer is against the law and authoritative precedent of the superior courts; hence the transfer is pre mature and liable to be set aside under the law.

5

It is, therefore most humbly prayed that the instant appeal may please be allowed in favor of the appellant against the respondents as prayed for in the heading of the appeal.

Appellant

Through

Dated 15<sup>th</sup> August, 2023

Muhammad Jamshed Kundi

Advocate Peshawar.

LIST OF BOOKS:

1. CONSTITUTION OF PAKISTAN
2. SERVICES LAWS
3. TRANSFER POSTING POLICY
4. ANY OTHER LAWS AS PER NEED.



6

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

APPEAL NO. \_\_\_\_\_ /2023

Ghulam Sadiq

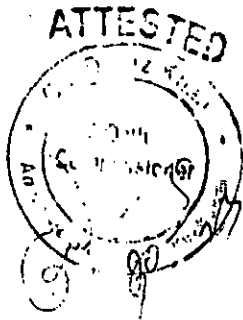
VS

GOVT. OF KPK & Others

**AFFIDAVIT**

I, Faheem Ullah Akhonzada Advocate High Court Peshawar as per instructions of my client, do hereby solemnly affirm and state, that the contents of accompanying Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon' able Tribunal.

Dated; \_ /05/2023



*Faheem Ullah Akhonzada*  
Deponent.  
BC-12-3780

Certificate:

It is certified that no earlier appeal has been pending or filed between the same parties and on same subject matter except the instant appeal.

*Faheem Ullah Akhonzada*  
Deponent

**CHIEF CHAIRMAN KHYBER PUKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR**

7

**BEFORE THE CHAIRMAN KHYBER PUKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR**

In Re S.A No. \_\_\_\_\_/2023

**Ghulam Sadiq S/O Ghulam Noman SDEO (M) Sub Division Bahrain, District  
Swat, R/O Tehsil & Village Bahrain District Swat.**

**VERSUS.**

**Government of Khyber Pukhtunkhwa.**

**CERTIFICATE**

**Under the instruction, direction and information of appellant it is to certify  
that appellant has not filed any appeal on the same subject before any other  
forum including KPK service tribunal Peshawar and the present appeal is  
first time preferred Dated:**

15<sup>th</sup> – Aug- 2023

***Appellant***

Through

***Muhammad Jamshed Kundi***  
Advocate Peshawar.

8

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

SERVICE APPEAL No. \_\_\_\_\_/2023

Ghulam Sadiq

VS

GOVT. OF KPK & OTHERS

**APPLICATION FOR SUSPENSION OF OPERATION OF THE  
IMPUGNED OFFICE ORDER NO. No SO(MC)E&SED/4-  
16/2023/Posting/Transfer/MC/TC dated 04.05.2023 TILL  
THE FINAL DISPOSAL OF THE ABOVE MENTIONED APPEAL.**

**RESPECTFULLY SHEWETH:**

- 1- That the above mentioned appeal along with this application has been filed before this august service Tribunal in which no date has been fixed so far.
- 2- That if the impugned order dated 04.05.2023 has not been suspended the appellant will face irreparable loss and will declare the above-mentioned appeal infructuous.
- 3- That all the three ingredients necessary for the stay is in favor of the appellant.
- 4- That the Impugned order dated 04.05.2023 had been issued by the respondents in utter disregard of law and prevailing Rules with melafide intentions.

It is therefore, most humbly prayed that on acceptance of this application the operation of the impugned dated 04.05.2023 may very kindly be suspended till the disposal of the above mentioned service appeal.

Dated: . -05.2023

APPELLANT

THROUGH:

Jamshed Khan Kundi

*F. Ullah Akhonzada*

Faheem Ullah Akhonzada

Advocates High Court.

**BEFORE THE HON'BLE SERVICE TRIBUNAL PESHAWAR**

In Re S.A No. \_\_\_\_\_/2023

**Ghulam Sadiq S/O Ghulam Noman**

**VERSUS.**

**Government of Khyber Pukhtunkhwa**

**ADDRESSES OF PARTIES**

***PETITIONER.***

**Ghulam Sadiq S/O Ghulam Noman SDEO (M) Sub Division Bahrain, District Swat, R/O Tehsil & Village Bahrain District Swat**

**ADDRESSES OF RESPONDENTS**

- 1. The Govt. of Khyber pukhtunkhwa through Secretary Elementary & Secondary Education.**
  - 2. The Director E. & S. E. Department Khyber pukhtunkhwa Peshawar.**
  - 3. The District Education Officer (M), Swat.**
  - 4. Shamshad Khan SST (G), GHS Qandeel Tehsil Bahrain District Swat.**
- .....Respondents

Dated: 15<sup>TH</sup> -Aug- 2023

**APPELLANT**

Through

**Muhammad Jamshed Kundi**  
Advocate Peshawar.

10

**BEFORE THE CHAIRMAN KHYBER PUKHTUNKHWA**  
**SERVICE TRIBUNAL PESHAWAR**

In Re S.A No. \_\_\_\_\_/2023

**Ghulam Sadiq S/O Ghulam Noman SDEO (M) Sub Division Bahrain, District Swat, R/O Tehsil & Village Bahrain, District Swat.**

***VERSUS.***

**Government of Khyber Pukhtunkhwa.**

**APPLICATION FOR CONDONATION OF DELAY (if any)**

***Respectfully Sheweth,***

Petitioner submits as under:

- I. That the above mentioned appeal is being filed today before this Hon'ble Tribunal in which no date is fixed for hearing so far.
- II. That impugned order had been passed on 04-05-2023 against which departmental appeal was preferred on 10-05-2023 whereas the present appeal has been filed on 15-5-2023. The delay of 6 days in filling of the instant appeal was the result of closure of the court on Saturday i.e. 12-8-2023, public holidays on 13<sup>th</sup> and 14<sup>th</sup> August whereas from 8 to 11 August the bad weather conditions in Bahrain valley of Swat couple with official duty of appellant the appeal could not be filled with in time i.e. by 8<sup>th</sup> Aug 2023.

It is most humbly prayed that as the delay of 3 days was beyond the human control of appellant therefore it in the interest of justice to Condon the same and decide the appeal on merit.

**Dated: 15<sup>th</sup> - Aug- 2023**

***Appellant***

Through

***Muhammad Jamshed Kundi***  
Advocate Peshawar.



Fahim Abo  
yesterday at 10:21 pm



Annex A (11)

District Peshawar, the September 15, 2021

**NOTIFICATION**

**NO. SO/S&SE/SED/7-1/2021/PT/GM/1** The Competent Authority is pleased to order the transfer of the following Officers of Management Cadre of Elementary & Secondary Education Department; in the best public interest, with immediate effect.

S#	Name of officer & designation	From	To
1	Mr. Sultan Muhammad AEDO (MC BS-16)	AEDO (Primary) O/O DEO (M) Mardan	SDEO (M) Tehsil Ghan Kapurra District Mardan in OPS against the vacant post.
2	Mr. Ghulam Sadig BS-17 (English) BS-17	GHSS Mankiyal District Swat	SDEO (M), Bahrain District Swat vice S.No 03
3	Mr. Aurangzeb SDEO (MC BS-17)	SDEO (M) BS-17 Bahrain District Swat	SDEO (M) Alpun District Shangla against the vacant post

SECRETARY TO GOVT OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT

Encls. of even No. & Date

- Copy forwarded to the:
- 1 Accountant General, Khyber Pakhtunkhwa Peshawar
  - 2 Director, E&SE Khyber Pakhtunkhwa, Peshawar
  - 3 District Education Officer (Male) concerned
  - 4 District Account Officers, Concerned
  - 5 Director, EMIS E&SE Department
  - 6 PS to Minister for E&SE Department
  - 7 PS to Secretary E&SE Department
  - 8 PA to Additional Secretary (Estab) E&SE Department
  - 9 Officers concerned
  - 10 Office order file.

(HAFAEZ UR REHMAN SHAHI)  
SECTION OFFICER (SCHOOLS MALE)

*Handwritten signature and stamp*



Fahim Ado  
yesterday at 10:21 pm

Annex b

12

No. SO/MC/E&SE/2023/19



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Dated: 4<sup>th</sup> May, 2023

**NOTIFICATION**

**NO. SO/MC/E&SE/2023/19/2023** Position/Transfer/MC/TC: The following postings/transfers are hereby ordered with immediate effect, in the best public interest: -

Sr. No	Name of officer	From	To	Remarks
1	Muhammad Iqbal MC BS-17	Deputy DEO (Male) Dir Upper in OPS	SDEO (Male) Samarbagh Dir Lower.	AVP
2	Mr. Shamshad SST	ASDEO Kabol Swat	SDEO (Male) Bahraim Swat in OPS	AVP
3	Ikram Ullah SST (G)	GHS Wazir Ghardi Pabbi Nowshera	SDEO (Male) Pabbi Nowshera in OPS	V.S.No.4
4	Muhammad Sohail MC BS-17	SDEO (Male) Pabbi Nowshera	Report to Directorate of E&SE Peshawar	
5	Shabeer Ahmad MC BS-17	Assistant Director Directorate of E&SE	SDEO (Male) Nowshera	V.S.No.6
6	Aftab Ahmad MC BS-17	SDEO (Male) Nowshera	Assistant Director Directorate of E&SE	V.S.No.5
7	Bakhat Zada MC BS-17	SDEO (Male) Dir Upper	SDEO (Male) Kaskot Dir Upper	AVP
8	Muftoo Mahmood TC BS-16	SST (G) GHS Kuz Sheryal	SDEO (Male) Pallas, Kotli Pallas in OPS	AVP
9	Abdul Qayyum Shad, TC BS-16	ASDEO (Male) Circle Kandia Kohistan Upper	SDEO (Male) Kandia Kohistan Upper in OPS	AVP
10	Mst. Tahira Syed	ASDEO (Female) Phulara Manjehra	SDEO (Female) Pattan Kohistan Lower in OPS	V.S.No.11
11	Shalata Khan MC BS-17	SDEO (Female) Pattan Kohistan Lower	SDEO (Female) Bankad Kohistan Lower	AVP

2. No TADA is allowed.

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT

Encl: of given No. & date:

Copy forwarded for information to the:-

- 1 Accountant General, Khyber Pakhtunkhwa, Peshawar.
- 2 Director, E&SE Khyber Pakhtunkhwa, Peshawar.
- 3 Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
- 4 District Education Officer (Male/Female) Concerned.
- 5 District Accounts Officers Concerned.
- 6 PS to Advisor to Chief Minister on E&SE Khyber Pakhtunkhwa.
- 7 PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.

SECTION OFFICER (Management Cadre)



Fahim Ado  
yesterday at 10:21 pm

*Amir*

13



**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA PESHAWAR**

**NOTIFICATION**

Consequent upon the approval of the Competent Authority (Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar) transfer/posting of the following teachers are hereby ordered, with immediate effect in the interest of public.

Sr	NAME & DESIGNATION	FROM	TO (POSTED AS)	REMARKS
1	Kashif Iqbal SST (G)	GHS Qambar Swat	ADEO (Establishment Secondary) office of DEO (M) Swat	Vice serial # 1
2	Ali Rehman SST	ASDEO (M) Punnah	SST GHS Qambar	Vice serial # 1
3	Abubakar Sadiq SST	GHS Shangri	ADHO (Establishment Primary) office of DEO (M) Swat	Vice serial # 2
4	Muhammad SST	ADEO (Establishment Secondary) office of DEO (M) Swat	GHS Shangri	Vice serial # 3
5	Hidayat Khan SST	GHS Halaqan Swat	ADEO PAD office of DEO (M) Swat	Vice serial # 4
6	Ayub Khan	ADEO PAD office of DEO (M) Swat	GHS Halaqan Swat	Vice serial # 5
7	Abdul Qudous SST	GHS Kanjo	ADEO PAD office of DEO (M) Swat	Vice serial # 6
8	Fazlullah SST	ADEO PAD office of DEO (M) Swat	GHS Kanjo	Vice serial # 7
9	Shamshad SST	GHS Qandee	ASDEO Bahraïn	Vice serial # 10
10	Rahim Shah SST	ASDEO Bahraïn	GHS Qandee	Vice serial # 9
11	Akhtar Yousaf SST (G)	GHS Chahigh Swat	ASDEO (M) Khwazakhsa Swat	Vice Serial # 12
12	Latif Sher SST	ASDEO (M) Khwazakhsa Swat	GHS Chahigh Swat	Vice Serial # 11

**TERMS & CONDITIONS**

- Posting/Adjustment of Teaching Cadre Officers shall be considered as stop-gap arrangement till the arrival of Management Cadre officers.
- The order of the above named SSTs will be effective subject to the condition that they will give an undertaking/affidavit on legal paper/stamp paper to DEO (M) concerned to the effect, not to claim seniority of Management Cadre.
- Charge Report should be submitted to all concerned.
- No TA/DA is allowed.
- The terms & conditions mentioned in his appointment order as SST Teaching cadre will remain intact.

DIRECTOR

Dated the Peshawar 04/05/2023

Endst: No. 20362-65 F.No.263/ADEOs/M/Transfer Swat

Copy forwarded to the:

- District Education Officer (M) Swat.
- District Accounts Officer Swat.
- Teachers Concerned.
- Director Local Office.

Deputy Director (Estab-M-I)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa



Am mof D

14

GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Dated: 4<sup>th</sup> May, 2023

**NOTIFICATION**

**NO. SO/MS/E&SE/D/4-16/2023/Post/Intr/Transfer/MC/TC:** The following postings/transfers are hereby ordered with immediate effect, in the best public interest: -

Sr. No	Name of officer	From	To	Remarks
1.	Muhammad Iqbal MC BS-17	Deputy DEG (Male) Dv Upper in OPS	SDEO (Male) Samarbagh Dv Lower.	AVP
2.	Mr. Shamshad Khan SST (G)	ASDEO Kabal Swat	SDEO (Male) Bahrain Gwat in OPS	Services of Mr. Ghulam Bada is placed on the disposal of Directorate for further posting
3.	Ikram Ullah SST (G)	GHS Wazir Garh Pabbi Nowshera	SDEO (Male) Pabbi Nowshera in OPS	V.S No.4
4.	Muhammad Sohail MC BS-17	SDEO (Male) Pabbi Nowshera	Report to Directorate of E&SE Peshawar	
5.	Shabeer Ahmad MC BS-17	Assistant Director Directorate of E&SE	SDEO (Male) Nowshera	V.S No.6
6.	Aftab Ahmad MC BS-17	SDEO (Male) Nowshera	Assistant Director Directorate of E&SE	V.S No.5
7.	Bakhat Zada MC BS-17	SDEO (Male) Dv Upper	SDEO (Male) Kalkot Dv Upper	AVP
8.	Mufti Mahmood TC BS-10	SST (G) GHS Kur Sheryal	SDEO (Male) Pallas, Kotar Pallas in OPS	AVP
9.	Abdul Qayyum Shad, TC BS-16	ASDEO (Male) Chote Kanda Kohistan Upper	SDEO (Male) Kanda Kohistan Upper in OPS	AVP
10.	Mrs. Tahira Syed	ASDEO (Female) Phufara Manserwa	SDEO (Female) Pattan Kohistan Lower in OPS	V.S No.11
11.	Bhalata Khan MC BS-17	SDEO (Female) Pattan Kohistan Lower	SDEO (Female) Bankad Kohistan Lower	AVP

No TA/DA is allowed.

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT

- It of even No. & date:**
- Forwarded for information to the -
  - Accountant General, Khyber Pakhtunkhwa Peshawar
  - Director, E&SE Khyber Pakhtunkhwa, Peshawar
  - Director EMIS, E&SE Department with the request to upload the same on the official website of the department
  - District Education Officer (Male/Female) Concerned.
  - District Accounts Officers Concerned.
  - PS to Advisor to Chief Minister of E&SE Khyber Pakhtunkhwa.
  - PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.

*[Signature]*  
SECTION OFFICER (Management Cadre)



Fabim Ado  
yesterday at 10:21 pm

15  
Annex E



DEPARTMENT

Dated: 15<sup>th</sup> May, 2023

**CORRIGENDUM**

**NO.SO/IMCJE&SED/4-16/2023/Posting/Transfer/MC/TC:** In partial modification of this Department's notification of even number dated 04-05-2023, in respect of Mr. Shamshad appearing at Sr.No.2 may be read as under, in the best public interest.

Sr. No.	Name of officer	From	To	Remarks
1.	Mr. Shamshad Khan SST (G)	GHS Qandool Swat	SDEO (Male) Bahrain Swat In OPS	AVP

SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT

Endst: of even No. & date:

Copy forwarded for information to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
4. District Education Officers (Male), Concerned.
5. District Accounts Officer Concerned
6. PS to Advisor to Chief Minister on E&SE.
7. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.

*Naseer*  
15.05.23  
(NASEER ABBAS KHALIL)  
SECTION OFFICER (Management Cadre)



Fahim Ado

yesterday at 10:21 pm

16

Appendix F

**OFFICE OF THE DISTRICT EDUCATION OFFICER (M) DISTRICT SWAT.**

No. 1943

Dated 9/5 2023

To,

The Director,  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

Subject: **NOTIFICATION.**

Memo:

Reference your office Notification No.50 (MCJE&SED/4-16/2023 /Posting/ Transfer/MC/TC dated 04/03/2023 regarding transfer order in respect of Mr. Shamshad ASDEO Kabal Swat to SDEO(M) Bahrain Swat at S.No.(2) against vacant post. In this connection you are requested that, there is no vacant post at SDEO(M) Bahrain Swat and Mr. Ghulam Sadiq has already been working as SDEO(M) Bahrain Swat.


In this regard you are therefore requested that, the higher authorities may kindly be approached to withdraw the above mentioned transfer notification please.

  
District Education Officer (M)  
Swat

Endst No. 1943-45

Copy of the above is forwarded for information to;

1. PS to Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa Peshawar.
2. The District Comptroller of Accounts Swat.
3. The SDEO(M) Bahrain Swat.
4. The Principal/Head Master Concerned.
5. The EMIS Branch of local office.
6. The official concerned.
7. P.A to D.E.O. Male Swat.

  
District Education Officer (M)  
Swat

Fahim Ade  
yesterday at 10:21 pm

Annex(G)

17



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Peshawar, May 2023

**NOTIFICATION**

**NO. 60/MC/E&SE/DA-16/2023/P/Postings/Transfer/MC/TC:** The following postings/transfers are hereby ordered with immediate effect in the best public interest.

Sr. No	Name of officer	From	To	Remarks
1.	Mohammad Iqbal MC BS-17	Deputy DEO (Male) Dir Upper in OPS	SDEO (Male) Samatabagh Dir Lower	AVP
2.	Mr. Shamshad SST	ASDEO (Male) Semi	SDEO (Male) Barkhan SWI in OPS	AVP
3.	Iqram Ullah SST (G)	GHS Wazir Gardi Pabbi Nowshera	SDEO (Male) Pabbi Nowshera in OPS	V.S.No.4
4.	Muhammad Sohail MC BS-17	SDEO (Male) Pabbi Nowshera	Report to Directorate of E&SE Peshawar	
5.	Shaboor Ahmad MC BS-17	Assistant Director Directorate of E&SE	SDEO (Male) Nowshera	V.S.No.8
6.	Aftab Ahmad MC BS-17	SDEO (Male) Nowshera	Assistant Director Directorate of E&SE	V.S.No.5
7.	Bakhat Zada MC BS-17	SDEO (Male) Dir Upper	SDEO (Male) Kalat Dir Upper	AVP
8.	Muhtoo Mahmood TC BS-16	SST (G) GHS Kuz Sheryal	SDEO (Male) Pailan Kohistan in OPS	AVP
9.	Abdul Qayyum Shad TC BS-16	ASDEO (Male) Circle Kandla Kohistan Upper	SDEO (Male) Kandla Kohistan Upper in OPS	AVP
10.	Mrs. Tahira Syed	ASDEO (Female) Phulra Manshera	SDEO (Female) Pailan Kohistan Lower in OPS	V.S.No.11
11.	Bhaisita Khan MC BS-17	SDEO (Female) Pailan Kohistan Lower	SDEO (Female) Barkhan Kohistan Lower	AVP

2. No TADA is allowed.

SECRETARY TO GOVT OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT

End of even No. & date:

Copy forwarded for information to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
4. District Education Officer (Male/Female) Concerned.
5. District Accounts Officers Concerned
6. PS to Advisor to Chief Minister on E&SE Khyber Pakhtunkhwa.
7. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.

SECTION OFFICER (Management Cadre)



Fahim Ado

yesterday at 10:21 pm

19  
Annex I

Budget of  
Primary for 2017-18

72  
SWZIC16(12)  
ELEMENTARY & SECONDARY EDUCATION

Received  
from Finance  
on 18/10/17

FUNCTIONAL, OBJECT CLASSIFICATION AND PARTICULARS OF THE SCHEME	NUMBER OF POSTS		BUDGET ESTIMATES 2016-2017	REVISED ESTIMATES 2016-2017	BUDGET ESTIMATES 2017-2018
	2016-2017	2017-2018			
091103 ADMINISTRATION					
09 EDUCATION AFFAIRS AND SERVICES					
0911 PRE- & PRIMARY EDUCATION AFFAIR & SERVICES					
091103 PRE- & PRIMARY EDUCATION AFFAIR SERVICES					
091103 ADMINISTRATION					
SWZ6398 Sub Divisional Education Officer (A) - 1 Bahrain Swat					
481 TOTAL EMPLOYEES RELATED EXPENSES				1,873,728	1,888,706
4811 TOTAL PAY				1,378,536	1,411,006
4811-1 TOTAL PAY OF OFFICERS				813,300	1,502,100
481181 Total Basic Pay Of Officers				813,300	1,502,100 ✓
5131 Sub Divisional Education Officer (BPS-11)					813,300
4143 Assistant Sub Divisional Education Officer (BPS-16)					479,180
0912 Deputy Officer (BPS-16)					219,700
4811-2 TOTAL PAY OF OTHER STAFF				565,400	450,900 ✓
481121 Total Basic Pay Other Staff				565,400	450,900
4014 Accounts Assistant (BPS-11)					121,000
0112 Officer (BPS-04)					114,500
0912 Clerk (BPS-01)					102,700
4014 Sub-Group (BPS-01)					102,700
4811 TOTAL ALLOWANCES				505,200	386,800
4811-1 TOTAL REGULAR ALLOWANCES				505,200	386,800
481201 House Rent Allowance				98,900	121,000 ✓
481202 Conveyance Allowance				164,500	233,000 ✓
481207 Working Allowance				5,000	7,000 ✓
481208 Dress Allowance				5,000	7,000 ✓
481209 Intergroup Allowance				4,000	3,000 ✓
48120X Adhoc Allowance - 2016				204,900	311,100 ✓
481219 Medical Allowance				31,000	167,200 ✓
48121T Adhoc Relief Allowance 2012				31,000	71,700 ✓
481224 Computer Allowance				31,000	19,700 ✓
48122C Adhoc Relief Allowance - 2015					28,000 ✓

Signature  
District Officer  
Finance & Planning Swat



Fatin Ado  
yesterday at 10:21 pm

👉 ★ 😊 📄 🏠 📧 ✖  
(20)  
Annex J

**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER  
PAKHTUNKHWA, PESHAWAR**

**NOTIFICATION**

Consequent the approval of the competent authority Mr. Ghulam Sadiq SST GMS Arin District Swat is hereby transferred and posted against the vacant post of ASDEO (M) Circle Bahrain at the office of SDEO (M) Swat in his own pay & PPS in the interest of public service with effect from the date his taking charge subject to the terms & conditions noted below:-

The notification issued vide this office under endorsement No. 4101-06 is hereby cancelled.

**TERMS & CONDITIONS.**

1. Charge report should be submitted in full concerned.
2. No TA/DA etc are allowed
3. The order of the above named SST (teaching cadre) will be effective subject to the conditions that he will give an undertaking/affidavit on legal paper/stamp paper to CEO (M) Swat to the effect not to claim seniority of Management cadre.
4. His seniority will be intact in teaching cadre as per rules. He will not affect the promotion of any incumbent of that cadre.
5. The terms & conditions mentioned in his appointment orders as SST teaching cadre will intact.
6. He will not claim any kind of absorption in management cadre.




Endst: No. 4691-95 F. No. 436/V-4 /ADFO (M) Dated Peshr the 23/11 2014  
Copy of the above is to the

DIRECTOR

1. District Education Officer (M) Swat
2. District Accounts Officer Swat.
3. Officer concerned
4. PA to Director (E&SE) Khyber Pakhtunkhwa, Peshawar.
5. Master File.

Deputy Director (Stab)  
Elementary & Secondary Education K.P.

21

5469	پشاور بار ایسوسی ایشن، خیبر پختونخواہ
ایڈریس: محمد جمشید کنٹری	  
بار کونسل ایسوسی ایشن نمبر: BC10-9353	
رابطہ نمبر: 03359824445	

بجالات جناب: سر محمد جمشید کنواریہ، سر محمد جمشید کنواریہ


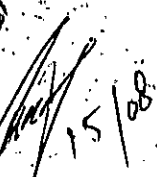
دعویٰ	سر محمد جمشید کنواریہ
علت نمبر	
مورخہ	
جرم	
تھانہ	
منجانب: سر محمد جمشید کنواریہ	بنام
علامہ مدارق	گورنمنٹ ہسپتال کراچی

بابت تحریر آگاہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ آن مقام میں حاضر آگئے۔ محمد جمشید کنواریہ کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقریر ثالث و فیصلہ بر خلاف ذمے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظریاتی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساتھ پر واضحہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جائزہ الٹوائے مقدمہ کے سب سے ہوگا۔ کوئی تازہ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب مابعد نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا دکالت نامہ لکھ دیا تاکہ سند نہ سے

المرقوم 15/08/2023

محمد جمشید کنواریہ



  
 15/08/2023

کے لیے منظور ہے۔