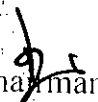


19.04.2017


None present for the appellant as well as on behalf of private respondent No. 4. Mr. Hamid Mansoor, Assistant alongwith Mr. Muhammad Bilal, Government Pleader for the official respondents present. D.B is also incomplete. To come up for final hearing before the D.B on 17.10.2017 at camp court, Abbottabad.


Chairman
Camp court, A/Abad

17.10.2017

None is present on behalf of the appellant despite several calls till last hours of the court. Mr. Muhammad Bilal, Deputy District Attorney alongwith Hamid Mansoor, Junior Clerk for the respondents present. Similarly, none was present on behalf of the appellant for the last two dates.

In view of the above, the appeal is dismissed for want of prosecution. File be consigned to the record room.


Member


Chairman
Camp Court, A/Abad.

ANNOUNCED

17.10.2017

29.03.2016

Counsel for the appellant and Mr. Muhammad Jan, GP for respondents present. Arguments could not be heard due to non-availability of D.B. Therefore, the case is adjourned to 14.06.2016 for arguments.


Chairman

14.06.2016


Counsel for the appellant and Mr. Muhammad Jan, GP for official respondents No. 1 to 4 present. The appeal pertains to the territorial jurisdiction of Hazara Division and as such to be heard at Camp Court Abbottabad. To come up for arguments on 23-11-2016 before D.B at Camp Court Abbottabad.


MEMBER


MEMBER

23.11.2016

None present for appellant. Mst. Bushra Bibi, Government Pleader for official respondents and Agent to counsel for private respondent No. 4 present. The Bench is incomplete therefore arguments could not be heard. The case pertains to territorial limits of Hazara Division, therefore assigned to D.B for final hearing for 19.04.2017 at camp court, Abbottabad.


Chairman
Camp Court, A/Abad

17.11.2014

Counsel for the appellant and Mr. Muhammad Jan, GP with Raeesur Rahman, SDEO for the respondents present. The Tribunal is incomplete. To come up for the same on 29.1.2015.


READER

29.1.2015

Counsel for the appellant and Mr. Muhammad Jan, GP with representative of the respondents present. Counsel for the appellant does not want to file rejoinder. Therefore, case to come up for arguments on 16.6.2015.


MEMBER

16.06.2015

Appellant with counsel, Assistant A.G for official respondents and clerk of counsel for private respondent No. 4 present. The learned Member (Judicial) is on leave, therefore arguments could not be heard. To come up for arguments on 2.10.2015.


Member

02.10.2015

Clerk to counsel for the appellant and Addl: AG for official respondents present. Rejoinder on behalf of the appellant submitted copy of which is handed over to the respondent-department. Arguments could not be heard due to general strike of the Bar. To come up for arguments on 29-3-16


Member


Member

1649/2014

24.4.2014

Junior to counsel for the appellant and Mr. Muhammad Jan, GP with Sakeenullah, ADO for official respondents present and needs further time. Counsel for private respondent No. 4 present and reply filed. To come up for written reply of official respondents on main appeal as well as reply/arguments on application on 7.7.2014.

MEMBER

MEMBER

7.7.2014.

Counsel for the appellant, Sr.GP with Khursheed Khan, SO and Sajjad Rashid, AD for respondents No. 1 & 2 present and need time. The learned Sr.GP also requested for time to contact respondent No.3. Counsel for private respondent No.4 present who already filed written reply. To come up for written reply of respondents No. 1 to 3 on main appeal as well as reply/arguments on stay application on 09.09.2014.

MEMBER

MEMBER

09.09.2014

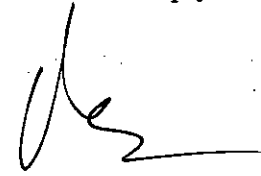
Junior to counsel for the appellant, Mr. Muhammad Jan, GP with Raeesur Rahman ASDEO for respondents No. 1 to 3 present and reply filed. Counsel for the private respondent No. 4 present who already filed written reply. To come up for rejoinder on 17.11.2014.

MEMBER

27.01.2014

Appellant with counsel present. Preliminary arguments heard and case file perused. Through the instant appeal under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, the appellant has impugned the order dated 01.08.2013, where by order dated 06.06.2013 was restored and the appellant was directed to continue his duty at GHS Bela Manoor Kaghan, while respondent No. 4 was posted at GHSS, Ghari Habibullah. The departmental appeal filed by the appellant against the impugned order dated 01.08.2013 has not been responded within the statutory period of 90 days, hence the present appeal on 27.12.2013. Since the instant appeal is within time and the appellant alleged that above referred impugned order is based on political interference. Hence, the matter required further consideration. Admit for regular hearing subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, Notice be issued to the respondents for submission of written reply on 17.02.2014. The appellant alongwith the appeal, has also submitted an application for suspension of operation of impugned order dated 01.08.2013 till the decision of the instant appeal, notice of application should also be issued to the respondents for reply/arguments on the date fixed.

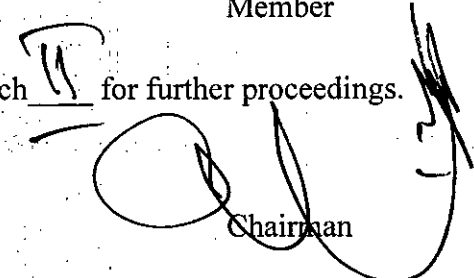
*Appellant deposited
Process fee & Security
of Rs. 2000/- Bank Receipt
attached with file*



Member

27.01.2014

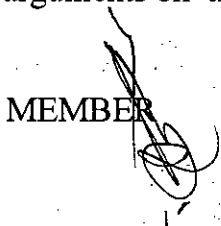
This case be put before the Final Bench for further proceedings.

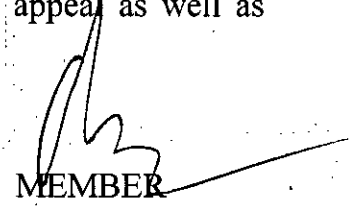


Chairman

17.2.2014

Counsel for the appellant and Mr. Muhammad Jan, GP with Khan Muhammad DO for the official respondents and Mr. Muhammad Asif Yousafzai, Advocate for private respondent No. 4 present and Wakalatnama placed on file. Respondents need time. To come up for written reply on main appeal as well as reply/arguments on application on 24.4.2014.

MEMBER 

MEMBER 

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 1649/2013

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1		3
1	27/12/2013	The appeal of Mr. Saeed Ahmad presented today by Mr. Sajid Amin Advocate may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing. REGISTRAR
2	6-1-2014	This case is entrusted to Primary Bench for preliminary hearing to be put up there on 27-1-2014. CHAIRMAN

**BEFORE THE KHYBER PAKHTUNKWA
SERVICE TRIBUNAL PESHAWAR**

Appeal No. 1649 /2013

Saeed Ahmad SCT (BPS-16), GHS, Bala Manoor Kaghan,
District Mansehra.

(Appellant)

VERSUS

Govt of Khyber Pakhtunkhwa through Chief Secretary Khyber
Pakhtunkhwa, Peshawar and others.

(Respondents)

INDEX

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3.	Notifications dated 21.02.2013 & 27.02.2013	A & B	7-12
4.	Order dated 21.05.2013, Relieving Chit & Charge Report	C, D & E	13-15
5.	Order dated 06.06.2013, Reliving Chit dated 14.06.2013 & Charge Report dated 16.06.2013	F, G & H	16-18
6.	Departmental Appeal, letter dated 01.07.2013 & order dated 25.07.2013	I, J & K	19-21
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Saeed Ahmad
Appellant

Through

Sajid Amin
SAJID AMIN

Advocate, Peshawar

**BEFORE THE KHYBER PAKHTUNKWA
SERVICE TRIBUNAL PESHAWAR**

Appeal No. 1649 /2013

1689
27-12-13

Saeed Ahmad SCT (BPS-16), GHS, Bala Manoor Kaghan,
District Mansehra.

(Appellant)

VERSUS

1. Govt of Khyber Pakhtunkhwa, Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Male), Mansehra.
4. Amjid Masood CT (BPS-15) GHSS, Ghari Habibullah, District Manshehra.

(Respondents)

Appeal under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974, against the Order dated 01.08.2013, whereby the order dated 06.06.2013, is restored and the appellant is directed to continue his duty at GHS Bela Manoor Kaghan, while the Respondent No. 4 has been posted at GHSS, Ghari Habibullah vice the Appellant against which the Departmental Appeal dated 05.09.2013, has not been responded despite the lapse of 90 days statutory period.

[Signature]
27/12/13

Prayer in Appeal;

On acceptance of this appeal the transfer Orders dated 01.08.2013, may please be set-aside and the appellant be allowed to continue his duties as SCT GHSS, Gahri Habibullah.

Respectfully Submitted:

1. That the appellant was initially appointed as CT teacher in the Respondent Department in the year.
2. That it is pertinent to mention that the appellant remained posted at different stations as and when directed / posted.
3. That the appellant was also promoted to the post of SCT (BPS- 16) vide Notification dated 22.02.2013, and his services were placed at the disposal of District Education Officer (male) Mansehra. (Copies of the Notifications dated 21.02.2013 & 27.02.2013, are attached as Annexure A & B)
4. That the appellant while performing his duties at G.M.S Ghoary Phair, was transferred to G.H.S.S, Ghari Habibullah while Respondent No 4 was transferred to GMS Bajhmohri vide order dated 21.05.2013. Accordingly the appellant was relieved from G.M.S, Ghoary Pair and he took over charge of his post at G.H.S.S Ghari Habibullah and started performing his duties. (Copies of the Order dated 21.05.2013, Reliving Chit and Charge Report are attached as Annexure C, D & E).
5. That hardly after 15 days, upon telephonic message of Principle staff Officer of the Chief Minster KPK, the order dated 21.05.2013, was cancelled in favour of Respondent No 4 vide order dated 06.06.2013, it is pertinent to mention that the appellant was further adjusted in a far fledged area at GHSS, Bela Manoor, Kaghan. The appellant was again relieved from duty on 14.06.2013, and he took over charge at his new place of posting. (Copies of the Order dated 06.06.2013, Reliving Chit dated 14.06.2013 & Charge Report dated 16.06.2013 are attached as Annexure F, G & H).
6. That the appellant filed departmental appeal dated which was duly forwarded vide letter dated 01.07.2013 to the Respondent No.3, accordingly the order dated 06.06.2013 was cancelled and the order dated 21.05.2013 was restored vide order dated 25.07.2013. (Copies of the Departmental Appeal, letter dated 01.07.2013 & order dated Order dated. 25.07.2013 are attached as Annexure I, J & K).
7. That again the Respondent No. 3 without caring of law vide order dated 01.08.2013, restored the order dated 06.06.2013 on political intervention of the Respondent No 4. Copy of the order dated 01.08.2013, was however communicated to

the appellant on 07.08.2013. (Copy of the order dated 01.08.2013, is attached as Annexure L)

8. That the appellant filed his departmental appeal dated 05.09.2013, which was forwarded to the Respondent No.3 vide letter dated 25.09.2013, however no reply has been given to the appellant despite the lapse of statutory period. (Copies of the departmental appeal and letter dated 25.05.2013 are attached as Annexure M & N)
9. That the impugned order is illegal, unlawful, without lawful authority against law and facts, politically motivated, and against the transfer and posting policy hence liable to be set aside inter alia on the following grounds:

GROUND OF APPEAL:

- A. That the appellant has not been treated in accordance with law his rights secured and guaranteed under the law are badly violated.
- B. That the impugned transfer orders are illegal, unlawful, void ab-initio, without lawful authority, hence liable to be set aside.
- C. That the impugned transfer orders are Political motivated made in favour of the Respondent No.4 on the recommendation of the Principle Staff Officer, Chief Minister who has got no authority to issue directions regarding posting and transfer, thus the impugned order is not tenable and liable to be set aside.
- D. That the appellant has not been allowed to complete his tenure and thus the order impugned is violation of transfer Posting Policy of the Govt. and the judgment of the apex court reported in PLD 1995 SC Page No 530 and PLD 2013 Supreme Court Page No 195. (Copy of the Transfer and Posting Policy is attached as Annexure O).
- E. That during the posting of the appellant at GHSS Habibullah his performance remained commendable and there was no complaint whatsoever regarding his performance.
- F. That the respondent No. 4 is CT (BPS-15) while the appellant is SCT (BPS16), however the Respondent No. 4 has been posted at Government Higher Secondary

School while the appellant despite being senior has been posted at Government High School.

- G. That in fact there exist no exigencies of service nor the order of transfer can be termed as in the public interest, rather it was issued in violation of law and transfer / posting policy of the Provincial Govt.
- H. That the impugned transfer order is illegal, unlawful, without lawful authority and passed without jurisdiction, not in the prescribed period, in violation of transfer and posting policy.
- I. That the Respondents without caring of Law has issued frequent transfer orders to accommodated the politically favorite Respondent No. 4, who has always exerted political pressure to get choice postings.
- J. That the repeated/ frequent transfer orders issued by the respondents are at the one hand against the public interest and on the other hand those are seriously effecting the performance of the appellant, since they are not allowing him to compete him his normal tenure of posting at one station.
- K. That the appellant seeks the permission of this Honorable Tribunal to rely on additional ground at the hearing of this appeal.

It is, therefore, requested that on acceptance of this appeal the transfer Orders dated 01.08.2013, may please be set-aside and the appellant be allowed to perform his duties at GHSS, Gahri Habibullah.

Saud H
Appellant

Through

Sajid A
SAJID AMIN
Advocate Peshawar.

**BEFORE THE KHYBER PAKHTUNKHAWA
SERVICE TRIBUNAL PESHAWAR**

Appeal No. _____/2013

Saeed Ahmad SCT (BPS-16), GHS, Bala Manoor Kaghan,
District Mansehra.

(Appellant)

VERSUS

Govt of Khyber Pakhtunkhwa, Secretary Elementary &
Secondary Education, Khyber Pakhtunkhwa, Peshawar.

(Respondents)

**Application for the suspension of operation of
the order dated 01.08.2013 till the decision of the
above noted Appeal**

Respectfully Submitted:

1. That the appellant has filed today the above noted appeal in this Honourable Tribunal in which no date of hearing has been fixed so far.
2. That the facts and ground mentioned in the accompanied appeal may be read as integral part of this application.
3. That the applicant has got a good prima facie case and there is likelihood of it success.
4. That the applicant would be exposed to great hard ship and inconvenience in case the order is not suspended.
5. That the impugned order passed is in violation of law and is politically motivated as the same is made on the direction of PSO to Chief Minister.

6. That it will also serve the interest of justice if the order impugned is suspended till the final decision of the appeal.

It is, therefore, prayed that on acceptance of this application the operation of the impugned order dated 01.08.2013, may please be suspended till the decision of the appeal.

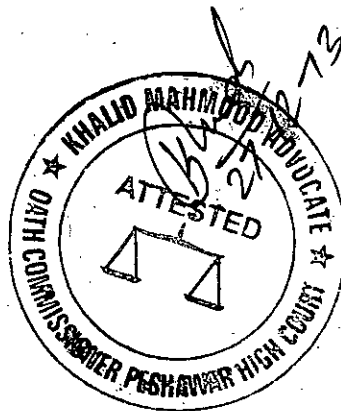
Saeed
Applicant

Through

Saeed
SAJID AMIN
Advocate, Peshawar

AFFIDAVIT

I, **Saeed Ahmad SCT (BPS-16), GHS, Bala Manoor Kaghan, District Mansehra**, do hereby solemnly affirm and declare on oath that the contents of the above Appeal as well as accompanied application are true and correct to best of my knowledge and believe and that nothing has been kept back or concealed from this Honourable Tribunal.



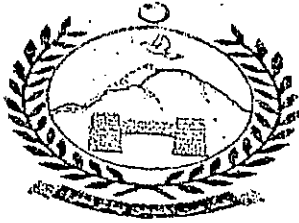
Saeed
Deponent

Khalid Zaman
President
All Teacher Association
Distt Mansehra

Muhammad Latif Khan Swati
General Secretary
All Teacher Association
Distt Mansehra

(7)

ANNEX - A (2)
CTs (M) Mansehra



Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

PH No. 091-9210389, 9210938,
9210437, 9210957, 9210468

Fax 091-9210936, 0800-33857

E-mail rafiq_kk851@yahoo.com

Notification

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification NoSO(B&A)/1-18/ERSH/2012 dated 11.07.2012 and Finance Department Endorsement No SO(FR)/FD/10-22(I)/2012 dated 16.07.2012, the following Male CTs B-15 are hereby promoted to the post of Senior CT BPS-16 (Rs.10000-800-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and further they will be posted in the Government Higher Secondary /High Schools by the District Education Officer concerned against the newly upgraded Senior CT BPS-16 posts:-

Total No. of CT (M) Posts duly verified by the DAO	812
1/3 share of Senior CT Posts	271
Share of promotion 100%	271
Promoted to the post of Senior CT B-16	270

S#	Sen:NO	Teacher's Name	School	Date of Birth	Remarks
1	1	Khalid Mehmood	GHS Shahalia	15/06/1956	Services placed at disposal of DEO (M) Mansehra for further posting.
2	3	Syed Shah Muahammad	GHS Khairabad	20/06/1956	Do
3	5	M.Ishfaq	GHS Shahalia	10/04/1963	Do
4	6	Muhammad Younas	GHS Bakki	15/10/1962	Do
5	7	Qmuhammad Mushtaq	GHSS No.1 Mansehra	05/01/1953	Do
6	8	Saif Ul Malik	GHS Bherkund	27/03/1967	Do
7	9	Mohd Fayyaz	GMS Hadu Bandi	04/01/1956	Do
8	10	Muhammad Jamshed	GMS More B Khurd	15/03/1964	Do
9	11	Abdul Qayum	GHS New Darband	18/04/1961	Do
10	12	Sajid Hussain Shah	GHSS Battal	01/05/1961	Do
11	13	Sajjad Ahmed	GHS Chitta Batta	01/06/1958	Do
12	14	Muhammad Javed	GHSS G H Ullah	01/05/1964	Do
13	15	Tariq Hussain Shah	GHS Kaghan	04/04/1954	Do
14	16	Abdul Malik	GHS Chitta Batta	14/06/1954	Do
15	18	Anwar Zeb	GHS Nawaz Abad	06/01/1955	Do
16	19	Saif Ud Din	GHS Thakra	08/04/1956	Do
17	21	Zain Ul Abideen	GHS Dharyal	28/06/1956	Do
18	22	Bostan	GHSS Shergarh	18/08/1956	Do
19	23	Mubarak Shah	GHS Shinkiani	10/02/1958	Do
20	24	M Khursheed	GHSS Behali	01/04/1958	Do
21	25	Muhammad Iqbal	GMS Baffa Khurd	02/01/1959	Do
22	26	Muhammad Saeed	GMS Hafeez Bandi	31/03/1959	Do

[Handwritten signature]

207	224	Khatib Ur Rehman	GHS Thakra	03/02/1968	---Do---
208	225	Ghulam Nabi	GMS Nallah Jabbar	29/03/1970	---Do---
209	226	Shabir Hussain Shah	GHSS No.1 Mansehra	05/05/1971	---Do---
210	227	Jamil Ur Rehman	GHS Kochati	01/04/1963	---Do---
211	228	Muhammad Ashrif	GHS Sum	10/04/1964	---Do---
212	229	Mushtaq Muhammad	GHSS Pairan	13/05/1969	---Do---
213	230	Rashid Ahmad	GHSS Behali	01/03/1970	---Do---
214	231	Ghulam Mustafa	GHS Bhangian	03/04/1970	---Do---
215	232	Bashir Ahmad	GHS Kochati	20/04/1970	---Do---
216	233	Muhammad Tahir	GHS Phulra	04/09/1967	---Do---
217	234	Muhammad Niaz	GMS Dhodial	03/04/1969	---Do---
218	235	Afser Khan	GHS Khabal Bala	25/06/1967	---Do---
219	238	Muhammad Irfan	GHS Attershisha	09/10/1967	---Do---
220	239	Shaukat Hussain	GHS G Habib Ullah	09/03/1968	---Do---
221	240	Shafiq Ur Rehman	GHSS Jared	01/05/1970	---Do---
222	241	Muhammad SAREED	GHS No 3 Mansehra	05/01/1971	---Do---
223	242	Muhammad Khalid	GMS Battang	01/03/1971	---Do---
224	243	Muhammad Imtiaz	GHS Timber Khola	06/04/1965	---Do---
225	244	Shah Zaman	GMS Kappi Gali	06/01/1966	---Do---
226	245	Mushtaq Ahmed	GHS Khushala	04/02/1968	---Do---
227	246	Saeed Ahmed	GMS Goray Phair	07/02/1968	---Do---
228	247	Haneed Ur Reman	GHSS G.H.Ullah	18/02/1969	---Do---
229	248	Muhammad Yousaf	GMS Methal	09/02/1971	---Do---
230	249	Syed Shokat Hussain Shah	GHS Talhatta	02/05/1966	---Do---
231	250	Muhammad Manzoor	GMS Dara Shohal	21/04/1969	---Do---
232	251	Shoukat Zaman	GMS Battangi	03/03/1971	---Do---
233	252	M.Akhter	GHS Khushala	15/03/1971	---Do---
234	253	Sajjad Hussain	GIIS Dadar	20/04/1968	---Do---
235	254	Ibrar Hussain	GMS Puldran	15/01/1966	---Do---
236	255	Liaqat Hussain	GMS Baddal Gran	10/04/1969	---Do---
237	256	Gulfam Khan	GHS G Habib Ullah	05/04/1967	---Do---
238	257	M.Rafique	GHS Sangar	26/04/1966	---Do---
239	258	Majid Hussain	GHS Khait Sarash	12/01/1968	---Do---
240	259	Aurangzeb	GHS Sehaki Bala	14/03/1967	---Do---
241	260	Muhammad Ilyas	GHS Kot Gali	22/03/1969	---Do---
242	261	Ghulam Habib	GMS Kulhary Baffa	08/04/1963	---Do---
243	262	Muhammad Naseem	GHSS Battal	29/12/1965	---Do---
244	263	Sajjad Ahmed	GHS Hussainian	03/10/1968	---Do---
245	264	Muhammad Saleh	GMS Ogra	01/01/1969	---Do---
246	265	Wali Ahmad	GMS Battangi	07/04/1958	---Do---
247	266	Ifrikhar Ahmed	GHS Kotli Bala	05/04/1960	---Do---
248	267	Myounas Khan	GHSS Karori	01/04/1961	---Do---
249	268	Rafi Ahmed	GHS Balakot	01/01/1967	---Do---
250	269	Muhammad Tariq	GHS Ichrian	15/02/1955	---Do---
251	270	Imran Shah	GHS Malookra	04/04/1959	---Do---
252	271	Muhammad Javid	GMS Baffa Khurd	15/08/1962	---Do---

253	272	Arif Rabbani	GHS Datta	02/03/1963	---Do---
254	273	Muneer Ahmed	GHS Gandhian	18/03/1963	---Do---
255	274	Shakeel Ahmad Afandi	GHS Behali	18/04/1969	---Do---
256	275	Fazal Islam	GHS Afzalabad	09/05/1971	---Do---
257	276	Raza Muhammad	GMS Bela Sach	05/03/1966	---Do---
258	277	Muhammad Arshad	GHS Balakot	07/01/1969	---Do---
259	278	Abdul Wahab	GHS Khabal Bala	29/06/1967	---Do---
260	279	Syed Ahmed Ali Shah Gillani	GHS Datta	09/06/1964	---Do---
261	280	Khalid Rehman	GHS Shinkari	02/05/1965	---Do---
262	281	Muhammad Javed	GMS Sawan Mera	01/04/1969	---Do---
263	282	Muhammad Khalid	GMS Chore Banda	30/04/1970	---Do---
264	283	Abdul Waheed	GHS Attershisha	01/01/1971	---Do---
265	284	Akhtar Zeb	GHS Shinkari	10/04/1971	---Do---
266	285	Muhammad Arif	GHSS G.H.Ullah	12/02/1967	---Do---
267	286	Msharif	GHSS Karori	14/02/1969	---Do---
268	287	Abdul Hafiz	GHS Bherkund	06/03/1969	---Do---
269	288	Alamgir Khan	GHS Oghi	15/05/1970	---Do---
270	289	Muhammad Ali	GHS Shahalia	30/04/1972	---Do---

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 his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be proceeded under the rules framed from time to time.
- 4 Charge report should be submitted to all concerned.
- 5 Their Inter-Se- seniority on lower post will remain intact.
- 6 No TA/DA is allowed for joining his duty.
- 7 They will give an under taking to be recorded in their service book to the effect that any over payment is made to him in light this order will be recovered from him. If wrongly promoted he will be reversed.

(Muhammad Rafiq Khattak)

Director

Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

3251-57
Endst: No. / File No.2/Promotion Senior CT B-16: Dated Peshawar the 21/02/2013

Copy forwarded for information and necessary action to the: -

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

Dy: Director (Estab)

Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Khalid Zaman
President
All Teacher Association
Distt Mansehra

Muhammad Latif Khan Swati
General Secretary
All Teacher Association
Distt Mansehra

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MANSEHRA.
NOTIFICATION

In pursuance to the Notification issued by the Director Elementary & Secondary Education Khyber Pakhtukhwa Peshawar vide Endst:3351-57/ F.No.2 Promotion Senior CT B-16 dated 21-02-2013, the following Two hundred & Sixty nine (269) (M) CT B-15 were promoted to the post of Senior CT B-16 @ (Rs.10000-800-34000) plus usual allowances as admissible under the rules on regular basis under the existing recruitment policy of the Provincial Government on the terms & condition given below as hereby adjusted at the stations noted against their names with immediate effect.

S.#	S.L.#	Name of Teacher	Present Station	Place of Posting	Remarks
1	1	KHALID MEHMOOD	GHS SHAHALIA	GHS SHAHALIA	Promoted & posted as Senior CT B-16 against the same station
2	3	SYED SHAH MUAHAMMAD	GHS KHAIRABAD	GHS KHAIRABAD	Promoted & posted as Senior CT B-16 against the same station
3	5	M.ISHFAQ	GHS SHAHALIA	GHS SHAHALIA	Promoted & posted as Senior CT B-16 against the same station
4	6	MUHAMMAD YOUNAS	GHS BAKKI	GHS BAKKI	Promoted & posted as Senior CT B-16 against the same station
5	8	SAIF UL MALIK	GHS BHERKUND	GHS KHAKI	Promoted & posted as Senior CT B-16 against Mr. Guftar Ahmad at S.# 270
6	9	MOHD FAYYAZ	GMS HADO BANDI	GHS NO.2 MANSEHRA	Promoted & posted as Senior CT B-16 against Mr. Alam Zeb at S.# 271
7	10	MUHAMMAD JAMSHED	GMS MORE B KHURD	GHS LTHAKRAL	Promoted & posted as Senior CT B-16 against Mr. Uaqat Ali Shah at S.# 305
8	11	ABDUL QAYUM	GHS NEW DARBAND	GHS NEW DARBAND	Promoted & posted as Senior CT B-16 against the same station
9	12	SAJID HUSSAIN SHAH	GHSS BATTAL	GHSS BATTAL	Promoted & posted as Senior CT B-16 against the same station
10	13	SAJJAD AHMED	GHS CHITTA BATTA	GHS LABARKOT	Promoted & posted as Senior CT B-16 against Mr. Rizwan Ullah at S.# 342
11	14	MUHAMMAD JAVED	GHSS G.H.ULLAH	GHSS G.H.ULLAH	Promoted & posted as Senior CT B-16 against the same station
12	15	TARIQ HUSSAIN SHAH	GHS KAGHAN	GHS KAGHAN	Promoted & posted as Senior CT B-16 against the same station
13	16	ABDUL MALIK	GHS CHITTA BATTA	GHS CHITTA BATTA	Promoted & posted as Senior CT B-16 against the same station
14	18	ANWAR ZEB	GHS NAWAZ ABAD	GHS NAWAZ ABAD	Promoted & posted as Senior CT B-16 against the same station
15	19	SAIF UD DIN	GHS THAKRA	GHS THAKRA	Promoted & posted as Senior CT B-16 against the same station
16	21	ZAIN UL ABIDEEN	GHS DHARYAL	GHS DHARYAL	Promoted & posted as Senior CT B-16 against the same station
17	22	BOSTAN	GHSS SHERGARH	GHSS SHERGARH	Promoted & posted as Senior CT B-16 against the same station
18	23	MUBARAK SHAH	GHS SHINKIARI	GHS SHINKIARI	Promoted & posted as Senior CT B-16 against the same station
19	24	M KHURSHEED	GHSS BEHALI	GHSS BEHALI	Promoted & posted as Senior CT B-16 against the same station
20	25	MUHAMMAD IQBAL	GMS BAFFA KHURD	GHSS BAFFA	Promoted & posted as Senior CT B-16 against Mr. Mustajir at S.# 273
21	26	MUHAMMAD SAEED	GMS HAFEZ BANDI	GHS MANGLOOR	Promoted & posted as Senior CT B-16 against Mr. M. Ejaz at S.# 273
22	27	RIAZ AHMAD	GHSS JARED	GHSS JARED	Promoted & posted as Senior CT B-16 against the same station
23	28	ABDUL AZIZ	GHS SALABAT	GHS SALABAT	Promoted & posted as Senior CT B-16 against the same station
24	29	MUHAMMAD YOUSAF	GHSS BAFFA	GHSS BAFFA	Promoted & posted as Senior CT B-16 against the same station
25	31	KHAN BAHADUR	GHS DATTA	GHS DATTA	Promoted & posted as Senior CT B-16 against the same station
26	33	M.GULAB	GHSS PAIRAN	GHSS PAIRAN	Promoted & posted as Senior CT B-16 against the same station

03009114011
Khalid Zaman
President
All Teacher Association
Distt Mansehra

Muhammad Latif Khan Swati
General Secretary
All Teacher Association
Distt Mansehra

PROMOTION ORDER CT (M) B-16

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			Present station	Place of Posting	
225	245	MUSHTAQ AHMED	GHS KHUSHALA	GHS KHUSHALA	Promoted & posted as Senior CT B-16 against the same station
226	246	SAEED AHMED	GHSS G.H.ULLAH	GHSS G.H.ULLAH	Promoted & posted as Senior CT B-16 against the same station
227	247	HAMEED UR REMAN	GHSS G.H.ULLAH	GHSS G.H.ULLAH	Promoted & posted as Senior CT B-16 against the same station
228	248	MUHAMMAD YOUSAF	GMS METHAL	GHSS JABBORI	Promoted & posted as Senior CT B-16 against Mr. Ishaq Ahmad at S.# 328
229	249	SYED SHOKAT HUSSAIN SHAH	GHS TALHATTA	GHS TALHATTA	Promoted & posted as Senior CT B-16 against the same station
230	250	MUHAMMAD MANZOOR	GMS DARA SHOHAL	GHS KHAIRABAD	Promoted & posted as Senior CT B-16 against Mr. Tanveer Ahmad at S.# 329
231	251	SHOUKAT ZAMAN	GMS BATTANGI	GHSS G.H.ULLAH	Promoted & posted as Senior CT B-16 against Mr. Naem Gul Khan at S.# 330
232	252	M.AKHTER	GHS KHUSHALA	GHS KHUSHALA	Promoted & posted as Senior CT B-16 against the same station
233	253	SAJJAD HUSSAIN	GHS DADAR	GHS DADAR	Promoted & posted as Senior CT B-16 against the same station
234	254	IBRAR HUSSAIN	GMS PULDRAN	GHS NARAN	Promoted & posted as Senior CT B-16 against Mr. Taj Muhammad at S.# 331
235	255	LIAQAT HUSSAIN	GMS SOWAN	GHS PARIS	Promoted & posted as Senior CT B-16 against Mr. M. Tahir at S.# 332
236	256	GULFAM KHAN	GHS G.H.ULLAH	GHS G.H.ULLAH	Promoted & posted as Senior CT B-16 against the same station
237	257	M.RAFIQUE	GHS SANGAR	GHS BALAKOT	Promoted & posted as Senior CT B-16 against Mr. Sohail Ahmad at S.# 333
238	258	MAJID HUSSAIN	GHS KHAIT SARASH	GHS KHAIT SARASH	Promoted & posted as Senior CT B-16 against the same station
239	259	AURANGZEB	GHS SEHAKI BALA	GHS SEHAKI BALA	Promoted & posted as Senior CT B-16 against the same station
240	260	MUHAMMAD ILYAS	GHS KOT GALI	GHS KOT GALI	Promoted & posted as Senior CT B-16 against the same station
241	261	GHULAM HABIB	GMS KULHARY BAFFA	GHSS BAFFA	Promoted & posted as Senior CT B-16 against Mr. M. Riaz at S.# 334
242	262	MUHAMMAD NASEEM	GHSS BATTAL	GHSS BATTAL	Promoted & posted as Senior CT B-16 against the same station
243	263	SAJJAD AHMED	GHS HUSSAINIAN	GHS HUSSAINIAN	Promoted & posted as Senior CT B-16 against the same station
244	264	MUHAMMAD SALEH	GHS LABARKOT	GHS LABARKOT	Promoted & posted as Senior CT B-16 against the same station
245	265	WALI AHMAD	GMS BATTANGI	GHS HASSA	Promoted & posted as Senior CT B-16 against Mr. Razaqat Hussain at S.# 335
246	266	IFTIKHAR AHMED	GHS KOTLI BALA	GHS KOTLI BALA	Promoted & posted as Senior CT B-16 against the same station
247	267	MYQUNAS KHAN	GHSS KARORI	GHSS KARORI	Promoted & posted as Senior CT B-16 against the same station
248	268	RAFI AHMED	GHS BALAKOT	GHS BALAKOT	Promoted & posted as Senior CT B-16 against the same station
249	269	MUHAMMAD TARIQ	GHS ICHRIAN	GHS ICHRIAN	Promoted & posted as Senior CT B-16 against the same station
250	270	IMRAN SHAH	GHS MALOOKRA	GHS MALOOKRA	Promoted & posted as Senior CT B-16 against the same station
251	271	MUHAMMAD JAVID	GMS BAFFA KHURD	GHS GANDHIAN	Promoted & posted as Senior CT B-16 against Mr. Iftikhar Ahmad at S.# 336
252	272	ARIF RABBANI	GHS DATTA	GHS DATTA	Promoted & posted as Senior CT B-16 against the same station
253	273	MUNEER AHMED	GHS GANDHIAN	GHS GANDHIAN	Promoted & posted as Senior CT B-16 against the same station
254	274	SHAKEEL AHMAD AFANDI	GHSS BEHALI	GHSS BEHALI	Promoted & posted as Senior CT B-16 against the same station
255	275	FAZAL ISLAM	GHS AFZALABAD	GHS AFZALABAD	Promoted & posted as Senior CT B-16 against the same station
256	276	RAZA MUHAMMAD	GMS BELA SACH	GHSS KAWAI	Promoted & posted as Senior CT B-16 against Mr. Abdur Rasheed at S.# 337

Khalid Zaman
President
All Teacher Association
Distt Manshera

Muhammad Latif Khan Swati
General Secretary
All Teacher Association
Distt Manshera

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336	IFTIKHAR AHMED	GHS GANDHIAN	GMS BAFFA KHURD	Vice S.# 251
337	ABDUR RASHEED	GHSS KAWAI	GMS BELA SACHA	Vice S.# 256
338	ASHRAF HUSSAIN SHAH	GHS CHATTER PLAIN	GMS KHABAL BALA	Vice S.# 258
339	MUHAMMAD SALEEM	GHS NO.2 MANSEHRA	GHS DATTA	Vice S.# 259
340	GHULAM GHOS	GHS L/NAWAB	GMS SAWAN MERA	Vice S.# 261
341	ALI ASGHAR	GHS DADAR	GMS CHOR BANDA	Vice S.# 262
342	RIZWAN ULLAH	GHS LABARKOT	GHS CHITTA BATTA	Vice S.# 10

TERMS & 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 Government.
3. Their services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be preceded 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. They will give an under taking to be recorded in their service book to the effect that if any over payment is made to him in light of this order will be recovered and if he is wrongly promoted he will be reversed.
7. They should join their post within 15 days of this notification in case of failure to join their post within 15 days of the issuance of this notification their promotion will be expire automatically & no subsequent appeals will be entertained
8. Checking & verification of all the documents shall be ensure by the DDO concerned.
9. Necessary entries to this effect should be recorded in their S/Book.
10. No TA/DA is allowed fro joining his duty.

Sd/-
(UMER KHAN KUNDI)
DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

Endst: No. 1933-40 /Estt: (M) Prom: Senior CT (M)/Dated Mansehra the 27-02- /2013.

Copy forwarded for information and necessary action to the:-

1. PS to Secretary to Government of Khyber Pakhtunkhwa E&SE Department Peshawar.
2. Director E&SE Department Khyber Pakhtunkhwa Peshawar.
3. All Principal /HM School concerned.
4. District Accounts Officer Mansehra
5. Dy: District Officer Finance & Planning Mansehra
6. B&AO local office
7. Officials concerned.

DY: DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

[Handwritten signature]

(13) Answer C

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MANSEHRA.

ORDER

In continuation of this office Endst: No.746-50 /Listt: (M) Trf: dated 24-01-2013, the following adjustments of CT are hereby ordered in the interest of Public service with immediate effect.

S.#	Name & Desig:	From	To	Remarks
1	Saeed Ahmad CT B-16	GMS Ghoray Pher under transfer to GHSS G.H.Ullah	GHSS G.H.Ullah	Vice S.#.2
2	S.Zulfiqar Shah CT B-15	GHSS G.H.Ullah under transfer to GMS Bajmohri	GMS Ghoray Pher	Vice S.#.1
3	Anjad Masood CT B-15	GHSS G.H.Ullah	GMS Bajmohri	Against V/Post

Notes:-

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

Sd/-

DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

Endst: No. 4608-10 /Listt: (M) Dated Mansehra the 22/5/2013.

Copy forwarded to the:-

1. Principal/HM School concerned.
2. District Accounts Officer Mansehra
3. Teacher concerned.

DY: DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

Govt
School
GAMM HABIBULLAH

YPC

(5)

DISTRICT EDUCATION OFFICER
(MALE) MANSHEHRA

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g/c Master
G.M.S Ghory Phair
G.M.S Ghory Phair
Head Master
G.M.S Ghory Phair
G.M.S Ghory Phair

Handwritten initials

Shahwar

Date 22-05-2013

No 12

Report G.H.S.S Gahni Habibullah

He is relieved off his duties
today on 22-05-2013 and directed to

Encl: No 4608-10 dated 21-05-2013

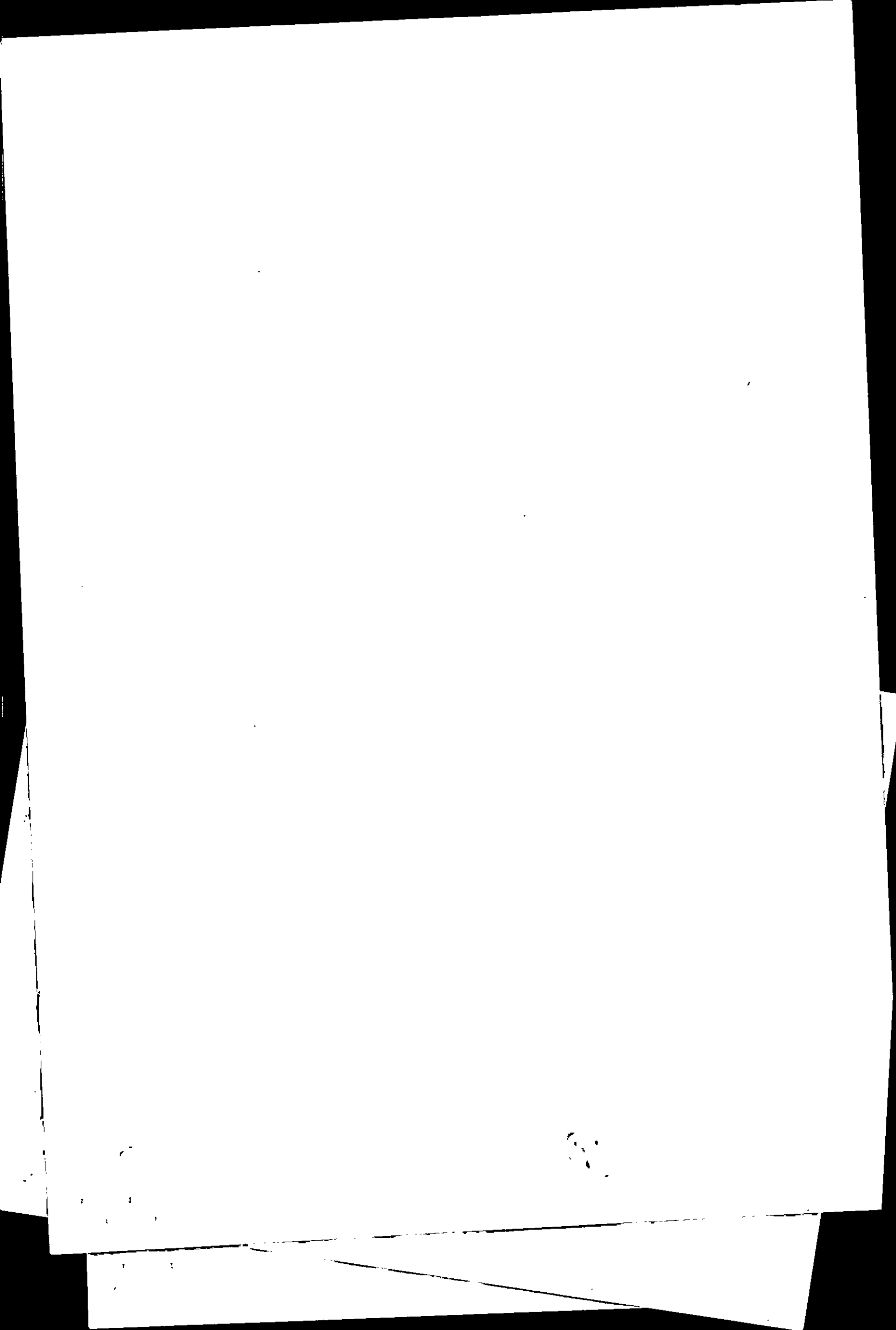
Mr. Saeed Ahmad C.T G.M.S Ghory
Phair has been transferred to G.H.S.S
Gahni Habibullah vide D.E.O (M), Manshehra

Amber D

Reliving chit

(14)

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ANNEXED: F

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MANSEHRA

ORDER

As per telephonic message of principal staff Officer of the chief Minister Khyber Pakhtun Khawa received on 06/06/2013 at 10:25 AM convey through 091-9211324, the adjustment order of Amjid Masood CT B-15 placed at S.# 3 vide this Office Order issued under Endst: No 4608-10 dated 21/05/2013 is hereby canceled.

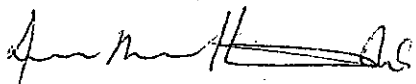
Mr. Saeed Ahmad SCT B-16 placed at S.# 1 vide this Office Order No. quoted above is hereby further adjusted at GHS Bala Manoor against vacant post of SCT B-16 w.e.f even No and date.

Sd/-
DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

Endst: No 5098-104
Copy to the:

Dated 06/06/2013;

1. Principal Staff Officer to Chief Minister Khyber Pakhtun Khawa Peshawar with reference to his telephonic message dated 06/06/2013.
2. Director Elementary and Secondary Education KPK Peshawar
3. District Accounts Officer Manserha.
4. Principal GHSS Ghari Habibullah.
5. H/M GHS Bala Manoor.
- 6-7 Teacher Concerned.


DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

4/16

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Approved: G⁽⁴⁾

RELIEVING CRT

Mr. Saeed Ahmed SCT GHSS Garhi Habibullah has been transferred to GHS Baila Manoor vide DEO(M) Mansehra Endst: No. 5098-104 dated 6.6.2013.

He relieved off his duties today 14.6.2013 A.N. and directed to report at GHS Bela Manoor.


PRINCIPAL
GHSS GARHI HABIBULLAH.

Principal
G.H.S.S.
Garhi Habibullah

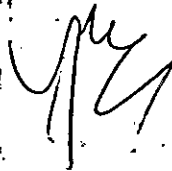


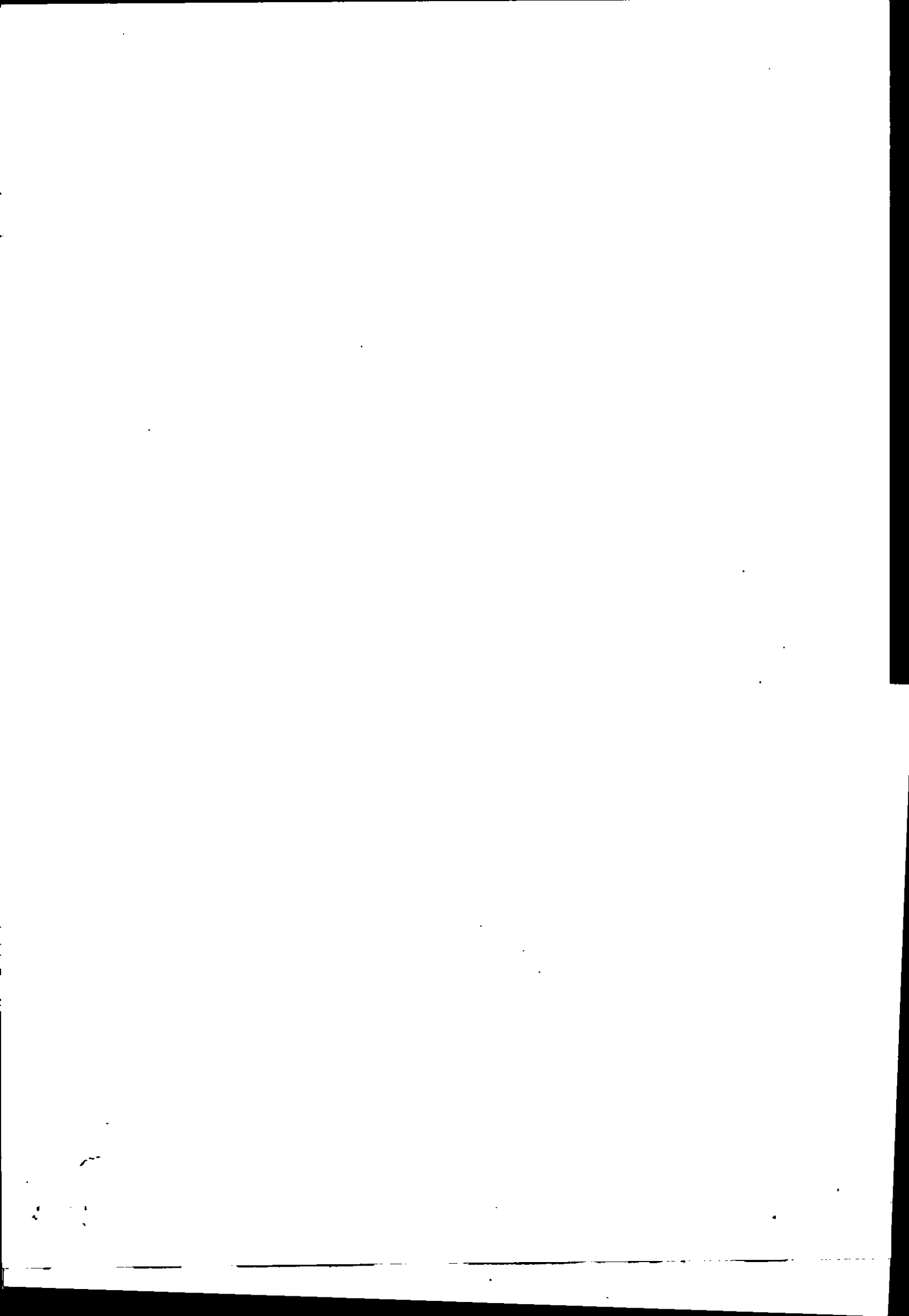
GHS Baila Manoor

Mansehra

HEAD MASTER
G.H.S Bela Manoor
Distt: Mansehra

Dated: 15/06/13 (M)





بخدمت جناب ڈائریکٹر صاحب،

ایلیمنٹری اینڈ سیکنڈری ایجوکیشن KPK پشاور

اپیل برائے منسوخی تبادلہ

جناب عالی!

گزارش ہے کہ سائل GMS گھوڑے پھیر گڑھی حبیب اللہ (مانسہرہ) میں BPS-15، CT پر کام کر رہا تھا۔ مورخہ 21.01.2013 کو سائل کا باہمی تبادلہ GHSS گڑھی حبیب اللہ ہوا۔ جس پر عملدرآمد نہیں ہوا۔ اس دوران سائل کی پروموشن BPS-16 سیریل نمبر 227/246 پر ہوئی اور ایڈجسٹمنٹ نہ ہو سکی اور سائل دو ماہ تک سرپلس رہا۔

یہ کہ مورخہ 21.05.2013 کو سائل کا مورخہ 24.01.2013 کا باہمی تبادلہ بحال ہوا جہاں سائل نے حاضری کر دی۔

یہ کہ مورخہ 06.06.2013 کو سائل کو GHSS گڑھی حبیب اللہ سے GHS بیلہ منور بذریعہ وزیر اعلیٰ KPK کے پرنسپل شاف آفیسر کے ٹیلیفونک کے ذریعے تبدیل کر دیا گیا۔ جو کہ ایک دور دراز علاقہ ہے۔

لہذا گزارش ہے کہ سائل کا مورخہ 21.05.2013 کا آرڈر بحال کیا جائے اور GHS بیلہ منور کا تبادلہ منسوخ کیا جائے۔
عین نوازش ہوگی!

المرقوم: 20 جون 2013ء

ارض

Saeed

سعید احمد (BPS-16) SCT

GHSS گڑھی حبیب اللہ تحصیل بالا کوٹ ضلع مانسہرہ

Hand Deposited by
Diana 861
20/3

YK

Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
No. 97/F.No 1-14/A-15/CT/DM/Mansehra Posting Transfer. Dated Peshawar the 17/7/2013

To
The District Education Officer
(Male)Mansehra

Subject:- APPLICATION FOR CANCELLATION OF TRANSFER.
Memo;

I am directed to enclose herewith a copy of the application alongwith its enclosures in respect Saeed Ahmad SCT GHSS Garhi Habibullah Balakot Mansehra for further necessary action under the rules/policy.
Encls As above.

Deputy Director (Establishment)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst No. 198
Copy forwarded to the

1. Saeed Ahmad SCT GHSS Garhi Habibullah Balakot Mansehra

Deputy Director (Establishment)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.

YGC

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ANNEX-12(4)

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MANSEHRA.

RESTORATION.

Consequent upon the approval of competent authority, the transfer order issued vide this office Endst: No 4608-10 dated 21-05-2013 is hereby restored with immediate effect in the interest of public service and the order Endst: No. 5098-104 dated 6/6/2013 is hereby withdrawn.

Mr. Amjad Masood CT will continue to work at GMS Bajmohri as usual.

Note:-


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

-----Sd-----
DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

Endst: No 6691-47 /Estt: (M) Dated Mansehra the 25/17/ /2013
Copy to the:-

- 1. Principal Staff Officer to Chief Minister KPK Peshawar.
- 2. MPA PK-53 with reference dated 13-07-2013.
- 3. Director Elementary & Secondary Education KPK Peshawar.
- 4. Principal GHSS G.H.Ullah.
- 5. District Accounts Officer Mansehra.
- 6. HM GMS Bajmohri.
- 7. Teacher concerned.

Babu Siddique Shah


DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

*please take on board
the teacher concerned
as per order.*



M. J. Khan
Principal
G.H.S.S
Garhi Habibullah
27/13

APPROVED: [Signature]

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MANSEHRA.

RESTORATION

As approved by the competent authority, this office order issued vide Endst: No.5098-104/Estt :(M) Dated 06-06-2013 is hereby restored.

Mr.Saeed Ahmad SCT B-16 will continue to work at GHS Bela Manoor as usual

Sd/-
DISTRICT EDUCATION OFFICER
(M) MANSEHRA.

Endst: No. 6789-94 /Estt: (M) Dated Manshra the 01/8/ 2013

Copy to the:-

1. Mr. Saqib Raza Principal Staff Officer to Chief Minister Khyber Pakhtunkhwa Peshawar w/r to his telephonic message received on 01-08-2013 at 10:44 am.
2. Director E&SE Department KPK Peshawar.
3. Principal GHSS G.H.Ullah.
4. District Accounts Officer, Manshra.
6. HM GHS Bela Manoor
7. Teacher concerned

[Signature]
DISTRICT EDUCATION OFFICER
(M) MANSEHRA.

Babou Seddeqae Sh

ple ase take in boat
the teacher concerned
as per order.

M S Hoppal

Principal / 87/13
G.H.S.S.
Garhi Habibullah

[Signature]

Handwritten signature or initials at the top of the page.

Main body of handwritten text, likely a list or report, containing various dates and names such as 'GHS', 'MMA', and 'DSCIT'. The text is written in Urdu and is oriented vertically.

Handwritten text at the bottom of the main body.

Handwritten text below the main body, possibly a signature or name.



Handwritten text at the bottom left, possibly a name or title.

Handwritten text at the bottom of the page, possibly a date or reference.

(24)

Approved: District Officer

3510
28-9-13

Directorate of Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar.

No: 6676 /F.No:1014/A-15/CT/DM/
Mansehra Posting / Transfer
Dated Peshawar the 25/9/ /2013

Saeed Ahmad
For m/g
m/c

To

The District Education Officer
(Male) Mansehra

SUBJECT:- APPEAL FOR CANCELLATION OF TRANSFER ORDER.

Memo:-

I am directed to enclose herewith a copy of the application
alongwith its enclosures in respect of Saeed Ahmad, CT, Govt. High School,
Bela Manor Mansehra, for further necessary action under the rules / policy.

DFC

Encls: As Above.

Deputy Director (Male/Estab)
(E&SE) Khyber Pakhtunkhwa.
24/9/2013

Handwritten signature

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ANNEX-2
BETTER COPY.

GOVERNMENT OF N.W.F.P
ESTABLISHMENT & ADMINISTRATION DEPARTMENT
(REGULATION WING)

NO.SOR-1(E&AD)1-1/85(Vol:II)

Dated the Peshawar the 15th February, 2003

- 1- All Administrative secretaries to Govt: of NWFP.
- 2- The Secretary to Governor, NWFP.
- 3- The Secretary to Chief Minister, NWFP.
- 4- All Heads of Attached Departments in NWFP.
- 5- All the Heads of Autonomous/Semi Autonomous Bodies in NWFP.
- 6- All Distt: Co-Ordination Officer/Political Agents in NWFP.
- 7- The Registrar Peshawar High Court Peshawar.
- 8- All Distt: & Session Judges in NWFP.
- 9- The Secretary NWFP Public Service Commission, Peshawar.
- 10- The Director Anti-Corruption Establishment, Peshawar.
- 11- The Secretary Board of Revenue, NWFP, Peshawar.
- 12- The Registrar, NWFP Service Tribunal, Peshawar.

SUBJECT: POSTING/TRANSFER POLICY OF THE PROVINCIAL GOVERNMENT.

Dear Sir,

- i. I am directed to refer to the subject noted above and to say that in supersession of all policy instructions issued in this behalf, the competent authority has approved the following Posting/Transfer Policy: -
 - i). All the posting /transfer shall be made strictly in the public interest and shall not be abused/misused to victimize the Government Servant.
 - ii). All Government servants are prohibited to exert political, Administrative or any other pressure upon the posting /transfer authorities for seeking posting/transfer of their choice and against the public interest.
 - iii). All contract Govt: employees appointed against specific posts cannot be posted against any other post.
 - iv). The normal tenure of posting shall be three years subject to the condition that for the officers/officials posted in unattractive areas, the tenure shall be two years and for the hard areas, the tenure shall be one year. The unattractive and

ATTESTED
One

while the remaining departments shall make posting/transfer in July. There shall be a ban on posting/transfer throughout the year excluding the aforementioned two months due to promotion/retirement/creation of new post/return from long leave/involvement in disciplinary proceedings and adjustment of surplus staff for which specific relaxation shall be obtained from the Chief Minister.

- vi) While making posting/transfers from settled area to FATA vice-versa specific approval of the Governor NWFP needs to be obtained.
- vii) Officers may be posted on executive/administrative posts in the Distt: of their domicile except District Co-Ordination Officers (DCOs), and Superintendent of Police (SP). Similarly Deputy Superintendent of Police (DSP) shall not be posted at a place where a Police Station (Thana) of his area/residence is situated.
- viii) No posting/transfers of the officers/officials on the detailment basis shall be made.
- ix) Regarding the posting of husband/wife, both in the Provincial Services, efforts where possible would be made to post such persons at one station and this will be subject to the public interest.
- x) All posting/transfers authorities may facilitate the posting/transfers of unmarried female Govt; Servant at the station of their residence of their parents.
- xi) Officer/officials except DCOs and SPs who are due to retire within one year may be posted on their option, on posts in the Distt: of their domicile and be allowed to serve there till retirement.
- xii) In terms of Rule-17 (1) and (2) read with schedule-III of the Govt: of NWFP Rules of Business 1985, transfer of officers shown in column 1 of the following table, table shall be made by the authorities shown against each officers in column 2 thereof: -

COLUMN-1	COLUMN-2
<p><u>Outside the Secretariat.</u></p> <ol style="list-style-type: none"> 1. Officers of the all Pakistan Unified Group i.e. DMG, PSP including Provincial Police Officers in BPS-18 and above. 2. Other officers in BPS-17 and above to be posted against scheduled posts or posts normally held by the APUG, PCS (EG) and PCS (SG) 3. Head of attached Deptt: and other officers in B-19 & above in all the Deptt: 	<p>Chief secretary in consultation with the Establishment Deptt. With the approval of the Chief Minister.</p>

YK

<p>In the Secretariat.</p> <p>4. Secretaries.</p> <p>5. Other officers and above the rank of Section Officers: -</p> <p>a)- Within the same Deptt:</p> <p>b)- Within the Secretariat from one Deptt: to another.</p> <p>6. Officers up to the rank of Superintendents.</p> <p>a)- Within the same Deptt:</p> <p>b)- To and from Attached Deptt:</p> <p>c)- Within the Secretariat from one Deptt: to another.</p>	<p>Chief Secretary with the approval of the Chief Minister.</p> <p>Secretary of the Deptt: concerned.</p> <p>Chief Secretary/ Secretary Establishment.</p> <p>Secretary of the Deptt: concerned.</p> <p>Secretary of the Deptt: in consultation with the Head of Attached Deptt: Secretary Establishment.</p>
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- xiii) While considering the posting/transfers proposals all the concerned authorities shall keep in mind the following: -
- a). To ensure the posting of proper persons on proper posts the annual confidential reports, past and present record of service, performance on post held presently and in the past and general reputation with focus on integrity of the concerned officer/officials be considered.
 - b). Tenure on present post shall also be taken into consideration and the posting/transfers shall be in the best public interest.
- xiv) Government servants including Distt: Government employees feeling aggrieved due to the orders of posting/transfers authorities may seek remedy from the next higher authority/ the appointing authority as the case may be brought an appeal to be submitted within seven days of the receipt of such order. Such appeal shall be disposed of within fifteen days. The option of appeal against posting/transfers orders could be exercised only in the following cases: -
- i)- premature posting/transfers or posting/transfers in violation of this policy.
 - ii)- Serious and grave personal(humanitarian) grounds.

guz

S.No	Officers	Authority
1-	Posting of Distt; Coordination Officer and Executive Distt: Officer in a Distt:	Provincial Govt:
2-	Posting of Distt: Police Officer.	Provincial Govt:
3-	Other officer in BPS-17 and above posted in the Distt:	Provincial Govt:
4-	Official in BPS-16 and below.	Executive Distt: Officer in consultation with Distt: Coordination Officer.

3. As per Rule-25 (2) of the Rules mentioned above the Distt: Coordination Department shall consult the Govt: if it is proposed to:-
- transfer the holder of the tenure post before the completion of his tenure or extend the period of his tenure; and
 - Acquire an officer to hold charge of more than one post for a period exceeding two months.

4. I am directed further to request that the above noted policy may be strictly observed/ implemented.

Your Faithfully,

Sd/xxx
(GHULAM JALANI ASIF)
ADDL: SECRETARY(REG:)

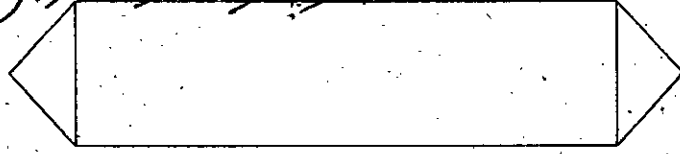
Endst:NO.SOR-1(E&AD)1-1/85

dated Peshawar the 15.2.2003.

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ATTESTED
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بعدالت حسرت الحقون خواجہ سردیس سرہنویل لہستان



مورخہ 07 دسمبر 2013ء پنجاب

مقدمہ سردیس لہستان

دعویٰ

جرم

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ آن مقام لہستان کے لیے سردیس لہستان کے مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ پر حلف دیے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک دروپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب سے وہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

2013

دسمبر

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المرقوم

العبد د گ د واہ العبد

کے لئے منظور ہے۔

مقام لہستان

سید احمد

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.

APPEAL NO. 1649/2013

Saeed Ahmed.

VS

Education Deptt:

REPLY ON BEHALF OF RESPONDED NO. 4

(AMJID MASOOD)

R.SHEWETH.

PRELIMINARY OBJECTIONS.

- 1- That the appellant has no cause of action & locus standi.
- 2- That the appellant has concealed material facts from this august Tribunal and as such the appellant has not come with clean hands.
- 3- That the appeal is bad for non-joinder of necessary parties.
- 4- That the appeal is not maintainable and entertainable in its present form.
- 5- That the appellant himself used political pressure and as such due to estoppels the appellant can not agitate the issue.
- 6- That the appeal is barred by time.

FACTS:

- 1- Denied for want of knowledge.
- 2- Denied. The appellant always used political pressure for his choice posting.

- 3- Correct to the extent of award of BPS-16 only while the rest of para is denied. The appellant was firstly transferred on 24.1.2013 on mutual basis and that order was never acted upon. Then a corrigendum was issued by the respondent Deptt: then the replying respond was transferred to accommodate the appellant as evident from the order dated. 21.5.2013.
- 4- Incorrect hence denied. As explained above the replying respondent was disturbed at the cost of appellant for political consideration.
- 5- In correct hence denied. The order dated 6.6.13 was cancelled by the appellant on political pressure on 25.7.13 which order concealed by the appellant and was passed by the Deptt: on the political intervention of local MPA etc.
- 6- Incorrect hence denied. More over as explained in para-4&5 above.
- 7- Incorrect hence denied. The order was passed on the departmental appeal of appellant keeping in view the spouse policy as the replying respondent's wife is also serving in Garhi Habibullah.
- 8- Incorrect. The appellant not filed departmental appeal in time and the attached appeal is a manure one and not in existence at all.

9- Incorrect. The appeal is not maintainable, time barred, and devoid of any legal footings, therefore, liable to be dismissed with costs.

GROUND:

A- Incorrect hence denied. The appellant himself violated all the norms of justice and rules of Govt.

B- Incorrect. Keeping in view the real conduct of the appellant the order is legal and based on true situation as per rules.

C- Incorrect. The appellant himself used political pressure as evident from the various orders.

D- Incorrect being not applicable in the instant case.

E- Denied for want of knowledge because he was never transferred to Garhi Habibullah at all and used unfair means to show himself as posted at Garhi Habibullah.

F- Incorrect, misconceived hence denied.

G- Incorrect hence denied. More over as explained in para- 3,5 & B above.

H- Incorrect. The appellant himself violated the principles of justice and Govt; rules regulation by fraudulently showing himself posted at Garhi Habibullah.

I- Incorrect hence denied. More over as explained in para B above.

J- Incorrect hence denied. The appellant himself used political pressure for making a case of frequent transfer order. Thus the appeal is based on malafide intentions.

K- Legal

It is therefore most humbly prayed that the appeal in hand may be dismissed with costs throughout.

Amjid Masood
3

RESPONDENT NO.4

AMJID MASOOD

TROUGH;

M. Asif Yousafzai

M.ASIF YOUSAFZAI

&

TAIMUR ALI KHAN

ADVOCATES.

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.

APPEAL NO. 1649/2013

Saeed Ahmed.

VS

Education Deptt:

REPLY ON BEHALF OF RESPONDENT NO. 4 TO STAY APPLICATION.

(AMJID MASOOD)

R.SHEWETH.

PRELIMINARY OBJECTIONS.

- 1- That the appellant has no cause of action & locus standi.
- 2- That the appellant has concealed material facts from this august Tribunal and as such the appellant has not come with clean hands.
- 3- That the appeal is bad for non joinder of necessary parties.
- 4- That the appeal is not maintainable and entertainable in its present form.
- 5- That the appellant himself used political pressure and as such due to estoppels the appellant can not agitate the issue.

FACTS:

- 1- No comments.
- 2- That the facts and grounds of reply may also be considered as integral part of this reply.
- 3- Incorrect. The appellant has no good prima facie case. Rather he used unfair means and not come to Tribunal with clean hands.

- 4- Incorrect. Hence denied.
- 5- Incorrect. The appellant himself used political pressure and now he is hit by principles of estoppels.
- 6- Incorrect. Rather the principles of justice would not allow suspending the order which has been obtained on malafide and unfair basis.

It is therefore most humbly prayed that the application in hand may be rejected with costs.

Amjad Masood

RESPONDENT NO.4

AMJID MASOOD

THROUGH;

M. Asif Yousafzai

M.ASIF YOUSAFZAI

&

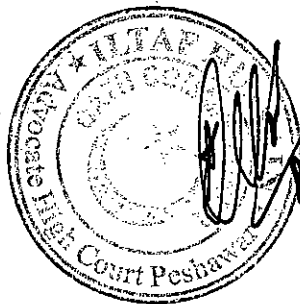
TAIMUR ALI KHAN

ADVOCATES.

AFFIDAVIT.

It is affirmed that the contents of replies are true and correct.

ATTESTED



DEPONENT.

Amjad Masood

①

SERVICE CERTIFICATE

Certified that Mr. Shabana Dayyum S/O Abdul Dayyum S.G.A.S.
Garhi Habibullah is permanent Govt. Servant in Education Department.

He has been working in Education Department w.e.f 14-06-1990.

29/5/13
SDEO (F)
Manshra.

It is stated that on 07/09/2013,
Higher Secondary School Garhi Habibullah at about 7.20 A.M

In the first instance before giving my reply, it is requested that I was not absent from duty On 07/09/2013 but was on casual leave, However the whole factual matters are explained Para wise as below

- 1) It was not correct factually that I was absent from school without any information on 07/09/2013. One day before ^{is} ~~gave~~ ^{I gave} me application for casual leave for 07/09/2013 to worthy school Principal, which was not only accepted & approved by concerned Principal but his acceptance /approval was also marked on the application (COPY ENCLOSED). The said mark application was presented before you on your clarification in this respect, and your good self also noted your honor remarks on the application, the application in same position is available on the school record. Furthermore,

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Handwritten date 01/06/09/2013.

Handwritten notes in the lower middle section, including the date 07/08/2013.

Handwritten notes on the left side of the lower middle section, including the name M. J. ...

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A circled number 4 at the bottom left corner of the page.

M. Satauddin Shah
District Education Officer
(Male) Manshehra

1- Director edu. (e & SE) KPIC Peshawar
2- Personnel off officer to CM: KPR Peshawar

copy to No 2277-72
7-9-13

M. Satauddin Shah
District Education Officer
(Male) Manshehra

your response should reach to undamaged
with in 3 days of now of this letter. In case of unavailability
response/not response you will be proceeded under memorandum
sub/ & no @ may 2011

3- why you are not register in gas service card
create problems for department?

2- why you used political pressure to adjust
your self at GHSSS 9 km. H.B. Khatla?

1- why you not attended the school on 7/9/13?

on my visit to school on 7/9/13 you were
absent from school without any information
you are directed to explain

Absence

Subject

To - Angad Meoood CT GHSSS 9 km. H.B. Khatla

DEC 11 (Manshehra)

From S. A. Khatla

No. 2276-
of 7/9/13

(5)



6

Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.

No. / F.No 647/A-15/CT/Mansehra posting transfer

Dated Peshawar the /2013

3/7

To: The District Education Officer
(Male)Mansehra

Subject:- DEPARTMENTAL APPEAL OF AMJAD MASOOD CT
Memo:

I am directed to enclose herewith a copy of the appeal in respect of Amjad Masood S/O Masoodur Rehman CT resident of Garhi Habibullah Tehsil Bala Kot District Mansehra for further necessary action under the rules/policy.
Encls as above.

Deputy Director (Establishment)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.

568

Endst No. /

Copy forwarded to the
Amjad Masood S/O Masoodur Rehman CT resident of Garhi Habibullah Tehsil Bala
Kot District Mansehra

Deputy Director (Establishment)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.
3/7/2013

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MANSEHRA

7

ORDER.

As approved by the competent authority, Mutual Exchange of post in respect of the following Teachers are hereby ordered on their own pay & BPS in the interest of public service with effect from the date of their taking over charge:

S.#	Name & Desig:	From	To	Remarks
1)	Tuljigees Humri S.M.S	S.M.S	S.M.S	M.P. 1000
	S.M.S	Shari Gulwalid	Sahay Meri	
2)	Saeed Ahmad C.T.	S.M.S	S.M.S	M.P. 1000
		Sahay Meri	Shari Gulwalid	

Note:-

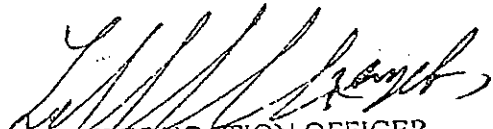
1. No TA/DA is allowed.
2. Charge report should be submitted to all concerned.

Sd/-
DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

Endst: No 746-50 / Estt: (M) Trf: Dated Mansehra the 24/11 2013

Copy to the:-

1. Principal/HM school concerned
2. District Accounts Officer Mansehra.
3. B&AO Local office
4. Official Concerned.


DY: DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

8

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MANSEHRA.

ORDER

In continuation of this office Endst: No.746-50 /Estt: (M) Trf: dated 24-01-2013, the following adjustments of CT are hereby ordered in the interest of Public service with immediate effect.

S.#	Name & Desig:	From	To	Remarks
1	Saeed Ahmad CT B-16	GMS Ghoray Pher under transfer to GHSS G.H.Ullah	GHSS G.H.Ullah	Vice S.#.2
2	S.Zulfiqar Shah CT B-15	GHSS G.H.Ullah under transfer to GMS Bajmohri	GMS Ghoray Pher	Vice S.#.1
3	Amjad Masood CT B-15	GHSS G.H.Ullah	GMS Bajmohri	Against V/Post

Note:-

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

Sd/-
DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

Endst:No. 4608-10 /Estt: (M) Dated Manshra the 22/5/2013.

Copy forwarded to the:-

1. Principal/HM School concerned.
2. District Accounts Officer Manshra
3. Teacher concerned.

DY: DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

9

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MANSEHRA

ORDER

As per telephonic message of principal staff Officer of the chief Minister Khyber Pakhtun Khawa received on 06/06/2013 at 10:25 AM convey through 091-9211324, the adjustment order of Amjid Masood CT B-15 placed at S.# 3 vide this Office Order issued under Endst: No 4608-10 dated 21/05/2013 is hereby canceled.

Mr. Saeed Ahmad SCT B-16 placed at S.# 1 vide this Office Order No. quoted above is hereby further adjusted at GHS Bala Manoor against vacant post of SCT B-16 w.e.f even No and date.

Sd/-

DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

Endst: No 5098-104

Dated 06/06/2013;

Copy to the:

1. Principal Staff Officer to Chief Minister Khyber Pakhtun Khawa Peshawar with reference to his telephonic message dated 06/06/2013.
2. Director Elementary and Secondary Education KPK Peshawar
3. District Accounts Officer Manserha.
4. Principal GHSS Ghari Habibullah.
5. H/M GHS Bala Manoor.
- 6-7 Teacher Concerned.

DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

(10)

~~(scribble)~~

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MANSEHRA.

RESTORATION.

Consequent upon the approval of competent authority, the transfer order issued vide this office Endst: No 4608-10 dated 21-05-2013 is hereby restored with immediate effect in the interest of public service and the order Endst: No. 5098-104 dated 6/6/2013 is hereby withdrawn.

Mr. Amjad Masood CT will continue to work at GMS Bajmohri as usual.

Note:-

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


-----Sd-----

DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

Endst: No 6641-47 /Estt: (M) Dated Mansehra the 25/7/2013

Copy to the:-

1. Principal Staff Officer to Chief Minister KPK Peshawar.
2. MPA PK-53 with reference dated 13-07-2013.
3. Director Elementary & Secondary Education KPK Peshawar.
4. Principal GHSS G.H.Ullah.
5. District Accounts Officer Mansehra.
6. HM GMS Bajmohri.
7. Teacher concerned.


DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

111

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MANSEHRA.

RESTORATION

As approved by the competent authority, this office order issued vide Endst: No.5098-104/Estt :(M) Dated 06-06-2013 is hereby restored.

Mr.Saeed Ahmad SCT B-16 will continue to work at GHS Bela Manoor as usual

Sd/-
DISTRICT EDUCATION OFFICER
(M) MANSEHRA.

Endst: No. 6789-94 Estt: (M) Dated Mansehra the 01/8/2013

Copy to the:-

1. Mr. Saqib Raza Principal Staff Officer to Chief Minister Khyber Pakhtunkhwa Peshawar w/r to his telephonic message received on 01-08-2013 at 10:44 am.
2. Director E&SE Department KPK Peshawar.
3. Principal GHSS G.H.Ullah.
4. District Accounts Officer, Mansehra.
6. HM GHS Bela Manoor
7. Teacher concerned


DISTRICT EDUCATION OFFICER
(M) MANSEHRA.

BEFORE THE CHAIRMAN SERVICE TRIBUNAL
KPK PESHAWAR.

Appeal No. 1649/2013.

Saeed Ahmad SCT (BPS-16) GHS Bela Manoor Kaghan, District Mansehra.

.....APPELLANT.

VERSUS

1. Govt Khyber Pakhtunkhwa (KPK), through Secretary E&SE Department Khyber Pakhtunkhwa, Peshawar.
2. Director, Elementary & Secondary Education KPK Peshawar.
3. District Education Officer (Male) Mansehra.
4. Amjid Masood CT (BPS)-15 GHSS, Ghari Habibullah District Mansehra.

.....RESPONDENTS.

Reply on behalf of Respondent No.1 to 3
Respectfully Sheweth:-

PREIMINARY OBJECTIONS:

1. That the appellant has got no cause of action/locus standi to file the instant appeal.
2. That the appeal is not maintainable in its present form and also the present circumstances of the issue.
3. That the appellant has not come to the court with cleans hands.
4. The instant appeal is bad for non-joinder/miss-joinder of necessary parties.
5. That the appellant is estopped by his own conduct to file the instant appeal.
5. That the appeal is ground less, and based on malafide.
6. That the appeal is based on false and malafide attention hence deserves dismissed.
7. That the respondents have not violated any law/policy/rules.

9. That the appellant has concealed the material facts from this honorable Tribunal.
10. That the appeal is badly time barred.

FACTUAL OBJECTIONS

1. Para No. 1 is correct to the extent that the appellant has appointed as CT.
2. Para No. 2 is incorrect, relates to official records of respondent.
3. Para No. 3 Pertains to Record.
4. Para No. 4. Pertains to Record
5. Para No. 5 is correct to the extent that the appellant/adjusted at GHSS Bela Manoor Kaghan without any political motivation. The order is in public interest further the Appellant executed implemented the order.
6. Para No. 6 is correct that the transfer order of appellant was restored dated 25-7-2013.
7. Para No. 7 is correct up to the extent that on 01-08-2013 order dated 06-06-2013 was restored in the interest of Public Service without any political intervention
8. Para No. 8 need proof.
9. Para No. 9 is incorrect, the appellant has got no Cause of action to file the appeal.

GROUND.

- A- Incorrect. All the transfer orders issued according with law, policy & rules.
- B- Incorrect. Transfer orders are legal & according with law.
- C- Incorrect, All the order issued in the interest of Public Service without any political intervention.
- D- It relates to the rules & law, hence no comments.
- E- Incorrect need proof.
- F- Incorrect.
- G- Incorrect, the impugned order is in accordance with law.
- H- Incorrect.
- I- Incorrect.

PRAYER.

It is therefore humbly requested that the appeal of the appellant may kindly be dismissed with cost.

Respondent No 1 _____
Secretary E&SE Department
KPK Peshawar

Respondent No 2 _____
Director Elementary & Secondary
Education KPK Peshawar

Respondent No 3 _____
District Education Officer
(M) District Mansehra
DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

AFFIDAVIT

I Khan Muhammad district education officer (male) Mansehra,
do hereby solemnly affirmed and declared that the content of the reply in the
above appeal No. 1649/2013 Saeed Ahmed versus Education Department
are true to the best of my conviction and belief and I have concealed
nothing.

RESPONDENT
DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA