


# FORM OF ORDER SHEET

Court of \_\_\_\_\_

**Appeal No.** 1904/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	19/09/2023	<p>The appeal of Mr. Sher Ali presented today by Mr. Noor Muhammad Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on</p> <p>By the order of Chairman</p>  <p>REGISTRAR</p>

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

APPEAL NO. 1904 /2023

**SHER ALI**

**VS**

**EDUCATION DEPTT:**

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**APPELLANT**

**THROUGH:**

**NOOR MOHAMMAD KHATTAK**  
**ADVOCATE SUPREME COURT**

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

APPEAL NO. 1904 /2023

Mr. Sher Ali, Retired Principal (BS-19)  
GHSS Sarai Bala Dir (Lower).

..... APPELLANT

**VERSUS**

- 1- Government of Khyber Pakhtunkhwa through Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
- 2- The Secretary, Elementary & Secondary Education, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
- 3- The Director, Elementary & Secondary Education, Peshawar.
- 4- The Accountant General, Khyber Pakhtunkhwa, Fort Road, Peshawar.

..... RESPONDENTS

**APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, 1974 AGAINST THE NOTIFICATION DATED 26.08.2022 WHEREBY THE ADJUSTMENT WAS MADE W-E-F 26.08.2022 AND NOT FROM THE DATE OF PROMOTION I.E. W-E-F 25.04.2022 AND AGAINST NO ACTION TAKEN ON THE DEPARTMENTAL APPEAL OF APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS.**

**PRAYER:**

That on acceptance of this appeal the impugned adjustment notification may be kindly be rectified to be effected from 25.04.2022 and not from 26.08.2022 and the financial protection be allowed to him. Furthermore the impugned deduction/recovery from the pension of the appellant may please be set aside. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

**R/SHEWETH:**

**ON FACTS:**

- 1- That appellant was the employee of the respondent Department and till retirement serving as Principal (BS-19) quite efficiently and up to the entire satisfaction of his superiors.
- 2- That during service the appellant was promoted from BPS-18 to BPs-19 vide Notification dated 25/04/2022 on the proper recommendation of Provincial Selection Board. Copy of the notification dated 25-04-2023 is attached as annexure .....**A.**
- 3- That vide Notification dated 26.08.2022 the appellant upon was adjusted w-e-f 26.08.2022 against the post of Principal (BPS-19) GHS Seri Bala Dir Lower. Copy of the notification is attached as annexure.....**B.**
- 4- That it is pertinent to mention here that due to adjustment notification dated 26.08.2022 one annual increment already allowed to the appellant was illegally deducted from the pension of the appellant after his retirement. Copy of LPC is attached as Annexure.....**C**
- 5- That appellant feeling aggrieved from the illegal action of the respondents preferred Departmental appeal but no reply has been received to the appellant so far. Copy of the Departmental appeal is attached as annexure.....**D.**
- 6- That appellant feeling aggrieved and having no other remedy but to file the instant service appeal on the following grounds amongst the others.

**GROUND:**

- A- That the impugned action of the respondents by illegal deduction from the monthly pension of the appellant against the law, facts, norms of natural justice and materials on the record, hence not tenable and liable to be set aside.
- B- That the appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article-4 and 25 of the Constitution of Islamic Republic of Pakistan, 1973.

C- That the respondent Department acted in arbitrary and malafide manner though impugned action of the respondents by illegal deduction from the monthly pension of the appellant

D- That the impugned illegal action of the respondents by illegal deduction from the monthly pension of the appellant is in violation of Article-38 (e) of the Constitution of Islamic Republic of Pakistan, 1973.

E- That the impugned illegal action of the respondents by illegal deduction from the monthly pension of the appellant in violation of the principle of natural justice.

F- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore, most humbly prayed that the appeal of appellant may be accepted as prayed for.

Dated:

  
APPELLANT

THROUGH:

  
NOOR MOHAMMAD KHATTAK  
ADVOCATE SUPREME COURT

  
KAMRAN KHAN

  
MUHAMMAD AYUB

  
WALEED ADNAN

  
UMAR FAROOQ

&

  
MAHMOOD JAN  
ADVOCATES

**AFFIDAVIT**

I, Sher Ali, Retired Principal (BS-19) GHSS Sarai Bala Dir (Lower), do hereby solemnly affirm and declare on Oath that the contents of this **Service Appeal** are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Court.

  
DEPONENT



Dated Peshwar, the April 25, 2022

U.A.  
4

**NOTIFICATION**

**NO. SO/SMIE&SED/1-2/2021/Promotion of (BS-18) (BS-19) (BS-20)**:- On the recommendation of Provincial Selection Board in its meeting held on 07-04-2022 the following Teaching Cadre Officers of Elementary & Secondary Education Department are hereby promoted from (BS-18) to (BS-19) on Regular Basis, with immediate effect.

S.No	Name of Officer	S.No	Name of Officer
1	Mr. Abdul Qayum	2	Mr. Muhammad Pariz Khan
3	Mr. Chen Zeb	4	Mr. Jamil Ahmad
5	Mr. Muhammad Riaz	6	Mr. Muhammad Sadiq
7	Mr. Munir Hussain	8	Mr. Iqbal Ali Shah
9	Mr. Akhtar Waheed	10	Mr. Noor-ul-Qul
11	Mr. Khalil Ur Rehman	12	Mr. Juyyid Shehzad
12	Mr. Sher Ali Khan	14	Mr. Gul Islam
15	Mr. Daud Ur Rehman	16	Miss Zia Ud Din
17	Mr. Israj Ali	18	Mr. Sajid Aziz
19	Mr. Muhammad Shafiq	20	Mr. Jehan Zeb
21	Mr. Saif Ullah Shah	22	Mr. Hayat Muhammad
23	Mr. Khizar Hayat	24	Mr. Habib Ur Rehman
25	Mr. Abdur Rashid	26	Mr. Muhammad Anwar
27	Mr. Faiz Ur Rehman	28	Mr. Nadeem Sultan
29	Mr. Amin Ul Haq	30	Mr. Javed Akhtar
31	Mr. Saif Badshah	32	Mr. Khan Badshah
33	Mr. Syed Latif Shah	34	Mr. Muhammad Rahim
35	Mr. Fayaz Ahmad	36	Mr. Muzafar Shah
37	Mr. Mehboob Ur Rehman	38	Mr. Lal Wadood
39	Mr. Younas Ali Khan	40	Mr. Faraz Rabi
41	Mr. Farid Khan	42	Mr. Tariq Farooq
43	Mr. Zain Ullah	44	Mr. Hamid Hussain
45	Mr. Abdul Hamid	46	Mr. Husn Ullah
47	Mr. Ahmad Saeed	48	Mr. Shahid Ali
49	Mr. Muhammad Saleem	50	Mr. Muhammad Tabir
51	Mr. Salim Islam Tariq	52	Mr. Muhammad Ayaz Shah
53	Mr. Gpl Nawab Khan	54	Mr. Amir Sultan
55	Mr. Rafi Ullah Khan	56	Dr. Muhammad Hamid
57	Mr. Izat Khan	58	Mr. Farzand Ali Khan
59	Mr. Warqa Hussain	60	Mr. Muhammad Waseel
61	Mr. Abid Hussain	62	Mr. Nisar Ahmad
63	Mr. Imtiaz Ali	64	Mr. Bakht Rawan
65	Mr. Mir Aslam	66	Mr. Jehan Zeb
67	Mr. Akram Sult	68	Mr. Muhammad Jaffi Khan
69	Mr. Farhan Ali	70	Mr. Shafiq Ud Din

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GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Dated Peshawar the April, 25, 2022

NOTIFICATION

No. SO(SM)E&SED/1-2/2021/Promotion of (BS-18) (BS-19) TC:- On the recommendation of Provincial Selection Board in its meeting held on 07-01-2021, the following Teaching Cadre Officers of Elementary & Secondary Education department are hereby promoted from (BS-18) to (BS-19) on Regular Basis, with immediate effect.

S.#	Name of Officer	S.#	Name of Officer
1	Mr. Abdul Qayum	2	Mr. Muhammad Daraz Khan
3	Mr. Chen Zeb	4	Mr. Jamil Ahamid
5	Mr. Muhammad Riaz	6	Mr. Muhammad Sadiq
7	Mr. Munir Hussain	8	Mr. Iqbal Ali Shah
9	Mr. Akhtar Waheed	10	Mr. Noorani Gul
11	Mr. Khalil ur Rehman	12	Mr. Tayyib Shehzad
13	Mr. Sher ali Khan	14	Mr. Gul Islam
15	Mr. Daud Ur Rehman	16	Mian Zia Ud Din
17	Mr. Israj Ali	18	Mr. Sajid Aziz
19	Mr. Muhammad Shafqat	20	Mr. Jehan Zeb
21	Mr. Sair Ullah Shah	22	Mr. Hayat Muhammad
23	Mr. Khizar Hayat	24	Mr. Habib ur Rehman
25	Mr. Abdur Rashid	26	Mr. Muhammad Anwar
27	Mr. Faiz Ur Rehman	28	Mr. Nadeem Sultan
29	Mr. Amin Ul Haq	30	Mr. Javed Akhtar
31	Mr. Said Badshah	32	Mr. Khan Badshah
33	Mr. Syed Latif Shah	34	Mr. Muhammad Rahim
35	Mr. Payaz Ahmad	36	Mr. Muzafar Shah
37	Mr. Mehboob Ur Rehman	38	Mr. Lal Wadood
39	Mr. Younas Ali Khan	40	Mr. Fazal Rabi
41	Mr. Faiz Khan	42	Mr. Tariq Farooq
43	Mr. Zain Ullah	44	Mr. Hamid Hussain
45	Mr. Abdul Haim	46	Mr. Ihsan Ullah
47	Mr. Ahmad Saeed	48	Mr. Shahid Ali
49	Mr. Muhammad Saleem	50	Mr. Muhammad Tahir
51	Mr. Salar Islam Tariq	52	Mr. Muhammad Ayaz Shah
53	Mr. Gul Nawab Khan	54	Mr. Amir Sultan
55	Mr. Rafi Ullah Khan	56	Dr. Muhammad Hamid
57	Mr. Izat Khan	58	Mr. Farzand Ali Khan
59	Mr. Wargha Hussain	60	Mr. Muhammad Wakeel
61	Mr. abid Hussain	62	Mr. Nisar Ahmad
63	Mr. Imtiaz Ali	64	Mr. Bakht Rawan
65	Mr. Mir Aslam	66	Mr. Jehan Zeb
67	Mr. Akram Said	68	Mr. Muhammad Jalil Khan
69	Mr. Farnan Ali	70	Mr. Shara Ud Din

S5	Mr. Akhtar Abbas	R6	Mr. Muhammad Alan
S7	Mr. Akhtar Ali		

2. The officers on promotion will remain on probation for a period of one year. In terms of Section-6 (2) of the Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rule-15 (1) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules 1989.

3. Posting/Transfer notification will be issued later on.

**SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT**

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. Director, DPD Khyber Pakhtunkhwa.
4. Director, DCTE Abbottabad.
5. District Education Officer (Male), Concerned.
6. District Accounts Officer, Concerned.
7. PS to Minister E&SE Department, Khyber Pakhtunkhwa.
8. PS to Secretary E&SE Department, Khyber Pakhtunkhwa.
9. PA to Additional Secretary (Estab) E&SE Department.
10. Director, EMIS E&SE Department.
11. Officers concerned.

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25-4-89

(SYEDA ZAHAB NAQVI)  
SECTION OFFICER (SCHOOLS MALE)

*Handwritten signature: Akhtar*  
*Handwritten signature: Marjan*  
PRINCIPAL  
G.H.S. Chakdara  
District Peshawar



85	Mr. Akhtar Abbas	86	Mr. Muhammad Alam
87	Mr. Akhtar Ali	--	-----

2. The officers on promotion will remain on probation for a period of one year, in term of Section-6(2) of Khyber Pakhtunkhwa Civil Servants Act, 1973, read with Rule-15(1) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989.

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE, Khyber Pakhtunkhwa, Peshawar.
3. Director, DPD Khyber Pakhtunkhwa.
4. Director, DCTE Abbottabad.
5. District Education Officer (Male), concerned.
6. District Accounts Officer, concerned.
7. PS to Minister E&SE Department Khyber Pakhtunkhwa.
8. PS to Secretary E&SE Department, Khyber Pakhtunkhwa.
9. PA to Additional Secretary (Estab) E&SE Department.
10. Director, EMIS E&SE Department.
11. Officers concerned.

(SYEDA ZAINAB NAQVI)  
SECTION OFFICER (SCHOOLS MALE)



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Dated Peshawar the August 26, 2022

NOTIFICATION

NO.SO(S/M)E&SED/5-19/2022/Promotion from BS-18 to BS-19: Consequent upon their promotion from BS-18 to the post of Principal (BS-19) as notified vide this Department's Notification of even dated 25.04.2022, the following posting/Transfers and adjustment are hereby ordered, with immediate effect, in the best public interest:-

S #	Name & Designation	From	To	Remarks
1.	Mr. Abdul Qayyum Principal (BS-19)	Subject Specialist (Maths) BS-18 GHSS Dosehra, Charsadda	Principal (BS-19) GHSS Dosehra, Charsadda	A.V.P
2.	Mr. Muhammad Daraz Principal (BS-19)	Principal (BS-18) GHS Ahmadi Banda, Karak	Principal (BS-19) GHSS Darsmand, Hangu	A.V.P
3.	Mr. Chan Zeb Principal (BS-19)	Subject Specialist (Pak-Study) BS-18 GHSS Bagnotar, Abbotabad	Principal (BS-19) GHSS Sherwan, Abbottabad	A.V. P
4.	Mr. Jamil Ahmad Principal (BS-19)	Subject Specialist (Pak Study) BS-18 GHSS No.4, D.I Khan	Principal (BS-19) GHSS Wanda Lali, D.I Khan	A.V.P
5.	Mr. Muhammad Riaz Khan Principal (BS-19)	Subject Specialist (BS-18) GCET Mir Ali, NWTD	Vice Principal (BS-19) RPDC Mir Ali, NWTD	A.V.P
6.	Mr. Muhammad Sadiq Principal (BS-19)	Subject Specialist (Pak Study) BS-18 GHSS Hakim Haved, Bannu	Principal (BS-19) GHSS Molazai, Tank	A.V.P
7.	Mr. Munir Hussain Principal (BS-19)	Vice Principal (BS-18) GHSS Kawai Mansehra	Principal (BS-19) GHSS Kawai Mansehra	A.V.P
8.	Mr. Iqbal Ali Shah Principal (BS-19)	Subject Specialist (Pak Study) BS-18 GCHSS Bannu	Principal (BS-19) GHSS Eidak NWTD	A.V.P

9.	Mr. Akhtar Waheed Principal (BS-19)	Subject Specialist (Pak-Study) BS-18 GCHS Kohat	Principal (BS-19) GHSS Sheringal, Dir (Upper)	Vice S.No.86
10	Mr. Norani Gul Principal (BS-19)	Principal (BS-18) GHS Dalazak, Charsadda	Principal (BS-19) GHS Pandyal, District Mohmand	A.V.P
11	Mr. Khalil ur Rehman Principal (BS-19)	Subject Specialist (Economics) BS-18 GCHSS Bannu	Principal (BS-19) GHSS Bazar Ahmad Khan Bannu	A.V.P
12	Mr. Tayyab Shahzad Principal (BS-19)	Subject Specialist (Pak Study) BS-18 GHSS No.1 Haripur	Principal (BS-19) GHSS Beer Haripur	Vice S.No.88
13	Mr. Sher Ali Khan Principal (BS-19)	Subject Specialist (Economics) BS-18 GHSS Ouch Dir (Lower)	Principal (BS-19) GHS Seri Bala Dir (Lower)	A.V.P
14	Mr. Gul Islam Principal (BS-19)	Subject Specialist (Maths) BS-18 GHSS Jehangiri, Karak	Principal (BS-19) GHSS Jehangri, Karak	A.V.P
15	Mr. Daud ur Rehman Principal (BS-19)	Subject Specialist (English) BS-18 GHSS Dosehra, Charsadda	Principal (BS-19) GHSS Shakoor, Charsadda	A.V.P
16	Mr. Mian Zia Ud Din Principal (BS-19)	Principal (BS-18) GHS Spin Khak, Nowshera	Principal (BS-19) GHSS Pabbani Swabi	A.V.P
17	Mr. Israj Ali Principal (BS-19)	Subject Specialist (Pak-Study) BS-18 GHSS Gujar Garhi, Mardan	Principal (BS-19) GHSS Haji Yar Jan, Killi Mohmand	A.V.P
18	Mr. Sajjad Aziz Principal (BS-19)	Subject Specialist (Economics) BS-18 GCMHS No.1 Haripur	Principal (BS-19) GHSS Turbela Township, Haripur	A.V.P
19	Mr. Muhammad Shafqat Principal (BS-19)	Principal (BS-18) GHS Talhatta, Mansehra	Principal (BS-19) GHSS Jared, Mansehra	A.V.P
20	Mr. Jehanzeb Principal (BS-19)	Principal (BS-18) GHSS Jattipind, Haripur	Principal (BS-19) GHSS Kakotri, Haripur	A.V.P
21	Mr. Sair Ullah Shah Principal (BS-19)	Principal BS-18 GHS Jandu Khel, Bannu	Principal (BS-19) GHSS Hassu khel, NWA	A.V.P

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22	Mr. Hayat Muhammad Principal (BS-19)	Vice Principal (BS-18) GHSS Dakki, Charsadda	Principal (BS-19) GHSS Hari Chand, Charsadda	A.V.P
23	Mr. Khizar Hayat Principal (BS-19)	Vice Principal (BS-18) GHSS Jalozai, Nowshera	Principal (BS-19) GHSS Jalozai, Nowshera on Notional Basis for one day actualization, as the officer stood retired from Govt, Service on 24.04.2022	
24	Mr. Habib ur Rehman Principal (BS-19)	SS (Biology) BS-18 GHSS Ismail Khel, Bannu	Principal (BS-19) GHS Miranshah, NWA	A.V.P
25	Mr. Abdur Rasheed Principal (BS-19)	SS (Biology) BS-18 GHSS Bam Khel, Swabi	Principal (BS-19) GHSS Chanal, Swabi on Notional Basis for one day actualization, as the officer stood retired from Govt, Service on 14.04.2022	
26	Mr. Muhammad Anwar Principal (BS-19)	Senior Instructor (BS-18) PITE Peshawar	Principal (BS-19) GHSS Topi, Swabi	A.V.P
27	Mr. Faiz ur Rehman Principal (BS-19)	Subject Specialist (Biology) BS-18 GHS Behali, Mansehra	Principal (BS-19) GHS Battal, Mansehra	A.V.P
28	Mr. Nadeem Sultan Principal (BS-19)	Principal (BS-18) GHS Pawa, Abbotabad	Principal (BS-19) GHSS Ziarat Masoom, Abbottabad	A.V.P
29	Mr. Amin ul, Haq Principal (BS-19)	Subject Specialist (Pak-Study) BS-18 GHSS Dheri Likpani, Mardan	Principal (BS-19) GHS No.2 Sakhakot Malakand	A.V.P
30	Mr. Javed Akhtar Principal (BS-19)	Subject Specialist (Maths) BS-18 GHSS Bagra, Haripur	Principal (BS-19) GHS Chamad, Abbottabad	A.V.P
31	Mr. Said Bacha Principal (BS-19)	Subject Specialist (Maths) BS-18 RPDC, Mardan	Principal (BS-19) GHSS Totakan, Malakand	A.V.P
32	Mr. Khan Bacha Principal (BS-19)	Subject Specialist (Maths) BS-18 RPDC, Mardan	Principal (BS-19) GHSS Tordher, Swabi	A.V.P

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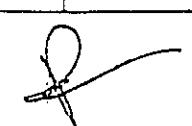


33	Mr. Syed Latif Shah Principal (BS-19)	Principal (BS-18) GCMHS No.4 Kohat	Principal (BS-19) GHSS Manaria, Swabi	A.V.P
34	Mr. Muhammad Rahim Principal (BS-19)	Principal (BS-18) GHSS Painda Khel, Bannu	Principal (BS-19) GHS Nar Muzaffar, District Lakki Marwat	A.V.P
35	Mr. Fayaz Ahmad Principal (BS-19)	Principal (BS-18) GHSS Zahir Abad Peshawar	Principal (BS-19) GHSS Shagai, Khyber	A.V.P
36	Mr. Muzafar Shah Principal (BS-19)	Subject Specialist (Physics) BS-18 GHSS No.4 Kakshal, Peshawar City	Principal (BS-19) GHSS Lund khwar, Mardan	Vice S.No. 96
37	Mr. Mehboob Ur Rehman Principal (BS-19)	Subject Specialist (Economics) BS-18 GHSS Warana, Karak	Principal (BS-19) GHSS Mera Orakzai	A.V.P
38	Mr. Lal Wadood Principal (BS-19)	Principal (BS-18) GHSS Badar Banda Mardan	Principal (BS-19) GHSS Nagrai Buner	A.V.P
39	Mr. Younis Ali Khan Principal (BS-19)	Instructor (BS-18) RPDC Mardan	Principal (BS-19) GHSS Kallang Mardan	A.V.P
40	Mr. Fazal Rabbi Principal (BS-19)	Subject Specialist (Physics) BS-18 GHSS Sherpao, Charsadda	Principal (BS-19) GHSS Shodag, Charsadda	A.V. P
41	Mr. Farid Khan Principal (BS-19)	Vice Principal (BS-18) GHSS Ouch, Dir (Lower).	Principal (BS-19) GHSS Shawaa, Dir (Lower)	A.V.P
42	Mr. Zain Ullah Principal (BS-19)	Vice Principal (BS-18) GHSS Chamkani, Peshawar.	Principal (BS-19) GHSS Kaghan, Mansehra	Vice S.No.87
43	Mr. Hamid Hussain Principal (BS-19)	Principal (BS-18) GHSS Ibrahimzai, Hangu	Principal (BS-19) GHSS Ali Zai, Kurram	A.V.P
44	Mr. Abdul Hamid Principal (BS-19)	Principal (BS-19) GHSS Samar Bagh, Dir (Lower) in OPS	Principal (BS-19) GHSS Samar Bagh, Dir (Lower)	Already Occupied
45	Mr. Ihsan Ullah Principal (BS-19)	Vice Principal (BS-18) GHSS Risalpur, Nowshera	Principal (BS-19) GHSS Nowshera Kalan	A.V.P

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46	Mr. Ahmad Saeed Principal (BS-19)	Subject Specialist (Pak-Study) BS-18 GHSS Janderi, Karak	Principal (BS-19) GHSS Balambat Dir (Lower).	A.V.P
47	Mr. Shahid Ali Principal (BS-19)	Vice Principal (BS-18) GHSS Narshak Mardan	Principal (BS-19) GHSS Palo Dehri, Mardan	A.V.P
48	Mr. Muhammad Saleem Principal (BS-19)	Subject Specialist (English) BS-18 GHSS Khwaza Khela, Swat	Principal (BS-19) GHSS Bahrian swat	A.V.P
49	Mr. Muhammad Tahir Principal (BS-19)	Subject Specialist (Pak-Study) BS-18 GHSS No.4 Mardan	Principal (BS-19) GHSS Alo, Mardan	A.V.P
50	Mr. Salar Islam Tariq Principal (BS-19)	Subject Specialist (Pak-Study) BS-18 GHSS No.1 Peshawar Cantt	Principal (BS-19) GHSS Tehkal Payan Peshawar	A.V. P
51	Mr. Muhammad Ayaz Principal (BS-19)	Subject Specialist (Physics) BS-18 GHSS Bakhshali, Mardan	Principal (BS-19) GHSS Gujrat, Mardan	A.V.P
52	Mr. Gul Nawab Khan Principal (BS-19)	Principal (BS-18) GHS Behram Khel, Lakki	Principal (BS-19) GHSS Bazed Khel, Orakzai	A.V.P
53	Mr. Amir Sultan Principal (BS-19)	Subject Specialist (English) BS-18 GHSS Bama Khela Matta Swat.	Principal (BS 19) GHSS Lelanai, Shangla	A.V.P
54	Mr. Rafi Ullah Khan Principal (BS-19)	Subject Specialist (Physics) BS-18 GHSS Kohat	Principal (BS-19) GHS Bilind Khel Orakzai	A.V.P
55	Dr. Muhammad Hamid Principal (BS-19)	Principal (BS-18) GHSS Falima, Mardan	Principal (BS-19) GHSS Qasmi Mardan	A.V. P
56	Mr. Izat Khan Principal (BS-19)	Subject Specialist (Economics) BS-18 GHSS No.1 Peshawar City.	Principal (BS-19) GHSS Kotha Swabi	A.V. P
57	Mr. Farzand Ali Khan Principal (BS-19)	Subject Specialist (Statistics) BS-18 GCHSS Bannu	Principal (BS-19) GHS Salima Sikandar Khel, Bannu	A.V. P

-10-



58	Mr. Warqa Hussain Principal (BS-19)	Vice Principal (BS-18) GHSS Shalozan, Kuram	Principal (BS-19) GHSS Shalozan, Kuram	A.V.P
59	Mr. Muhammad Wakeel Principal (BS-19)	Subject Specialist (Physics) BS-18 GHSS Lachi, Kohat	Principal (BS-19) GHSS Dalan, Hangu	A.V.P
60	Mr. Abid Hussain Principal (BS-19)	Instructor (BS-18) RPDC (M), Peshawar	Principal (BS-19) GHSS Haji Zai Shabqadar Charsadda	A.V.P
61	Mr. Nisar Ahmad Principal (BS-19)	Vice Principal (BS-18) GCMHS Timergara, Dir (Lower)	Principal (BS-19) GHSS Haji Abad Dir (Lower)	A.V.P
62	Mr. Imtiaz Ali Principal (BS-19)	Subject Specialist (Biology) BS-18 Science Assessment & Evaluation Wing DCTE Abbottabad	Principal (BS-19) GHSS Seri Gadai, Haripur	A.V.P.
63	Mr. Bakht Rawan Principal (BS-19)	Subject Specialist (Physics) BS-18 GHSS Zaimdara, Dir (Lower)	Principal (BS-19) GHSS Haya Sarai, Dir (Lower)	A.V.P
64	Mr. Mir Aslam Principal (BS-19)	Principal (BS-18) GHS Gul Muqam, Malakand	Principal (BS-19) GHS Hattar, Haripur	Vice S.No.97
65	Mr. Jehanzeb Principal (BS-19)	Subject Specialist (Physics) BS-18 GHSS Warana Karak	Principal (BS-19) GHSS Dalola, Abbottabad	Vice S.No.94
66	Mr. Akram Said Principal (BS-19)	Principal (BS-18) GHSS Islampur, Swat	Principal (BS-19) GHSS No.1, Mingora, Swat	Vice S.No.98
67	Mr. Muhammad Jalil Principal (BS-19)	Principal (BS-18) GHSS Darka Aziz Khan, Lakki Marwat	Principal (BS-19) GHS Hurmaz NWTD	A.V.P
68	Mr. Farman Ali Principal (BS-19)	Subject Specialist (Physics) BS-18 GHSS Bam Khel, Swabi	Principal (BS-19) GHSS Mansab Dar, Swabi	A.V.P
69	Mr. Sharaf ud Din Principal (BS-19)	Subject Specialist (English) BS-18 GHSS Bagnetar, Abbottabad	Subject Specialist (BS-19) Material Development DCTE Abbottabad	A.V.P



70	Mr. Said Muhammad Principal (BS-19)	Subject Specialist (English) BS-18 GHSS Wari Dir (Upper)	Principal (BS-19) GHSS Datura (Uppar)	A.V.P.
71	Mr. Habib Ullah Principal (BS-19)	Vice Principal (BS-18) GHSS Abo Khan, SDW Bannu	Principal (BS-19) GHS Haveli Khel, North Waziristan	A.V.P.
72	Dr. Qayyum Nawaz Principal (BS-19)	Instructor (BS-18) RITE D.I Khan	Principal (BS-19) GHSS No. 1, Tank	A.V.P.
73	Mr. Habib Ullah Khan Principal (BS-19)	Subject Specialist (Statistics) BS-18 GHSS No.4 Kakshal Peshawar City	Principal (BS-19) GHSS No.2 Tangji Charuadda	A.V.P.
74	Mr. Shah Jehan Principal (BS-19)	Subject Specialist (English) BS-18 GHSS Takkar, Mardan	Principal (BS-19) GHSS Kalam Swat	A.V.P.
75	Mr. Muhammad Rafiq Principal (BS-19)	Principal (BS-18) GHSS Paniala D.I Khan	Principal (BS-19) GHSS Khujaki Karak	A.V.P.
76	Mr. Nawab Khan Principal (BS-19)	Principal (BS-18) GHSS Darband Kalan D.I. Khan	Principal (BS-19) GHSS Panyala D.I. Khan.	A.V.P.
77	Mr. Saifullah Khan Principal (BS-19)	Subject Specialist (English) BS-18 GHSS Dakki, D.I. Khan	Principal (BS-19) GHSS Lar, D.I. Khan	A.V.P.
78	Mr. Aman Ullah Khan Principal (BS-19)	Subject Specialist (Statistics) BS-18 GHSS No.2 Islamia D.I. Khan	Principal (BS-19) GHSS Gandaf, Swabi	A.V.P.
79	Mr. Muhammad Umar Principal (BS-19)	Subject Specialist (English) BS-18 Garhi Habib Ullah, Mansehra	Principal (BS-19) GHSS Garhi Habib Ullah, Mansehra on Notional Basis for one day actualization, as the officer stood retired from Govt. Service on 30.06.2022	
80	Mr. Habib Ali Principal (BS-19)	Subject Specialist (Statistics) BS-18 GHSS Barikot, Swat	Principal (BS-19) GHSS Shamoza, Swat	A.V.P.
81	Mr. Muhammad Islam Principal (BS-19)	Principal (BS-18) GHS Shago Mamund, Bajaur	Principal (BS-19) GHSS Lal Qala, Dir (Lower)	A.V.P.



S2	Mr. Hakim Ullah Principal (BS-19)	Principal (BS-18) GHS Kotka Gul Akram, SDW Bannu	Principal (BS-19) GHSS Kiri Kheasora, D.I. Khan	A.V. P
S3	Mr. Akhtar Abbas Principal (BS-19)	Instructor (BS-18) RPDC (Male) D.I. Khan	Principal (BS-19) GHSS Rahmani Khol, D.I. Khan.	A.V.P
S4	Mr. Muhammad Alam Principal (BS-19)	Principal (BS-18) GHS Barikot, Swat	Principal (BS-19) GHSS Kanju, Swat	Vice S.No.104
S5	Mr. Akhtar Ali Principal (BS-19)	Principal (BS-18) GHS Chitor Swat	Principal (BS-19) GHSS Bandai, Swat	A.V.P.

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Consequential Posting/Transfers

S#	Name & Designation	From	To	Remarks
86.	Mr. Muhammad Salim Principal (BS-19)	GHSS Sheringal, Dir (Upper)	GHSS (BS-19) Dhand Saghri, Kohat	A.V. P
87.	Mr. Khurshid Khan Principal (BS-19)	GHSS Kaghan, Manshera	Principal (BS-19) GHSS Bakot, Abbottabad	Vice S.No.92
88.	Mr. Amir Attiq Siddqui Principal (BS-19)	GHSS Beer, Haripur	Principal (BS-19) GHSS Kot Najeeb Ullah, Haripur	A.V. P
89.	Mr. Nasir Ullah V/Principal (BS-18)	GHSS Shagram Chitral	Principal (BS-19) GHSS Morilisht Chitral (Lower) in OPS	Vice S.No.90
90.	Mr. Farid Ullah Principal (BS-19)	GHSS Morilisht Chitral (Lower)	Services placed at the disposal of Directorate of E&SE Peshawar	
91.	Mr. Ihsan Ahmad Principal (BS-19)	GHSS Kahi Nowshera	Principal (BS-19) GHSS Khairabad Nowshera	A.V. P
92.	Mr. Zulfiqar Ali Principal (BS-19)	GHSS Bakot, Abbottabd	Principal (BS-19) GHSS Kahi Nowshera	Vice S.No.91
93.	Mr. Zari Aman Principal (BS-19)	GHSS Kunda, Swabi	Principal (BS-19) GHS Nathia Galli	AVP



94.	Mr. Mubashir Khan Principal (BS-19)	GHSS Dalola Abbottabad	Principal (BS-19) Chittabaita Mansehra	AVP
95.	Mr. Alamgir Principal (BS-19)	GHSS Hathian Mardan	Principal (BS-19) GHS No.2 Batkhela Malakand	AVP
96.	Mr. Akbar Ullah Principal (BS-19)	GHSS Lund Khwar Mardan	Principal (BS-19) GHSS Hathian Mardan	Vice S.No.95
97.	Mr. Raja Shuja ud Din Principal (BS-19)	GHS Hattar, Haripur	Senior Instructor (BS-19) RPDC Haripur	A.V.P
98.	Mr. Akhtar Hussain Principal (BS-18)	Principal (BS-19) GHSS No.1 Mingora, Swat in OPS	Principal (BS-18) GHS Islampur, Swat	Vice S.No.66
99.	Mr. Dost Ali Khan Principal (BS-19)	GHSS Khaki Mansehra	Principal (BS-19) GHSS Landiwa, Lakki Marwal	A.V.P
100.	Mr. Muhammad Amin Principal (BS-19)	GHSS Agari, Buner	Principal (BS-19) GHS Ghorghosto, Buner	A.V.P
101.	Mr. Zahid Amin Principal (BS-19)	GHSS Haji Zai, Shabaqadar Charsadda	Principal (BS-19) GHSS Gul Bela, Peshawar	A.V.P
102.	Mr. Irshad Ali Principal (BS-19)	GHS Mian Gujar, Peshawar	Senior Instructor, (Monitoring, Evaluation & Quality Issuance) BS-19 DPD Peshawar.	A.V.P
103.	Mr. Abdullah Khan Principal (BS-18)	GHSS Bosti Khel, Darra Adam Khel, FR Kohat	Principal (BS-19) GHS Mian Gujar, Peshawar in OPS	Vice S.No.102
104.	Mr. Shaukat Ali Principal (BS-18)	Principal (BS-19) GHSS Kanju Swat In OPS	Principal (BS-18) GHS Barikot, Swat	Vice No.84
105.	Mr. Salim Ashraf Principal (BS-18)	GHS Ghari Hassan Zai, Torghar	Principal (BS-18) GHS Talhatta Mansehra	Vice S.No.19
106.	Mr Khalid Khan SS English (BS-18)	Principal (BS-19) GHSS Katlang, Mardan in OPS	Subject Specialist (English) BS-18 GHSS Dosehra, Charsadda	Vice S.No.15
107.	Mr. Inayat Ali Principal (BS-18)	Principal (BS-19) GHSS Shalozan Distt Kuram in OPS	Principal (BS-18) GHS No.2 Para	Vice S.No.122

- 14 -

108	Dr. Jan Alam S S (Pak-Study) BS-18	GHS Jalozai Nowshera	Chinar Distt Kuram SS (Pak Study) BS-18 GHSS No.1 Peshawar Cantt.	Vice S.No.50
109	Noor Muhammad Principal (BS-18)	Principal (BS-19) GHS. Peer Khel, Malakand in OPS	Principal (BS-18) GHS Gul Muqam, Malakand	Vice S.No.64
110	Fazli Rafi Shah Principal (BS-18)	Principal (BS-18) Working against wrong Cadre Post SIPE (BS-18) GHSS Khesghi Payan Nowshera	Vice Principal (BS-18) GHSS Risalpur, Nowshera	Vice S.No.45
111	Habib-ur-Rehman Principal (BS-18)	Principal (BS-18) working Against SS Chemistry (BS-18) GHSS Khawaza Khela Swat	Vice Principal (BS-18) GHSS Chamkani, Peshawar	Vice S.No.42
112	Billal Ahmad Principal (BS-18)	GHSS Al-Hameed Wali Noor Jani Khel Bannu	Principal (BS-18) GHSS Kotka Gul Akram, SDW Bannu	Vice S.No.82
113	Rahat Shah Principal (BS-18)	Principal (BS-18) Working against SS (English) GHSS Gadezi, Buner	Subject Specialist (English) BS-18 GHSS Takkar, Mardan	Vice S.No.74
114	Mr. Inam Ullah SS (Maths) BS-18	GHSS Ustar Zai Payan Kohat	Instructor (BS-18) RPDC (M) Peshawar	Vice S.No.60
115	Mr. Azeem Ud Din Principal (BS-18)	GHSS Garyala, Mardan	Principal (BS-18) GHSS Falima, Mardan	Vice S.No.55
116	Mr. Waqar Ahmad SS (Physics) BS-18	GHSS Khesghi Payyan, Nowshera	Subject Specialist (Physics) BS-18 GHSS No.4 Kakshal Peshawar	A.V.P
117	Mr. Mukhtiar Muhammad SS (Physics) BS-18	Awaiting for posting	Subject Specialist (Physics) BS-18 GHSS Bam Khel, Swabi	Vice S.No.68
118	Muhammad Ishaq SS (H/Civics) BS-18	GHSS Nawagai, Buner	Principal (BS-18) GHS Dalazak, Charsadda	Vice S.No.10
119	Mr. Sattar Khan SS (Physics) BS-18	GHSS Dhakki D.I. Khan	Instructor (BS-18) RITE D.I Khan	Vice S.No.72
120	Mr. Javed Khan S S (Physics) BS-18	GHSS Tarnab, Charsadda	Vice Principal (BS-18) GHSS Pir Piai Nowshera	A.V.P

121	Mr. Naveed Ali Khan SS (Statistics) BS-18	GHSS Togh Bala Kohat	Subject Specialist (Statistics) BS-18 GHSS No.4 Kakshal Peshawar	Vice S.No.73
122	Mr. Muhammad Nabi Principal (BS-18)	Principal (BS-18) GHS No.2 Para Chinar Kurrum	Vice Principal (BS-18) GHSS Shalozan, Kurrum	Vice S.No.58
123	Mr. Bismillah Khan Principal (BS-18)	GHSS Lodhi Khel, Hangu	Principal (BS-18) GHSS Dcaba Hangu.	A.V.P
124	Mr. Waheed Ullah IPE (BS-17)	GHSS Dallan Hangu	Instructor (BS-18) RPDC (Male) D.I. Khan in OPS	Vice S.No.83
125	Syed Shujaat Ali Shah Principal (BS-18)	Working as SS (Islamiat) BS-18 GHSS Ziamdara, Dir (Lower)	Principal (BS-18) GHSS Zahir Abad, Peshawar	Vice S.No.35
126	Mr. Muhammad Taza Gul SS (Statistics) BS-18	GHSS Ramak D.I.Khan	Subject Specialist (Statistics) BS-18 GHSS No.2 Islamia D.I. Khan	Vice S.No.78
127	Mr. Inayatullah Principal (BS-18)	GHSS Torwarsak District Buner	Principal (BS-19) GHSS Peer Khel Malakand	Vice S.No.109
128	Mr. Alam Khan Principal (BS-18)	GHSS Shalpin Swat	Principal (BS-18) GHSS Chitor Swat	Vice S.No.85

2. The posting/transfer falls in Election Districts will take effect from the completion of the Election process/ publication of official result by Election Commission of Pakistan.

SECRETARY TO GOVT OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT

Endst: 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 Accounts Officer Concerned.
5. Principal Concerned.
6. Director, EMIS E&SE Department.
7. Officers concerned.
8. Office order file.

Baqir Ali  
(BAQIR ALI)  
SECTION OFFICER (SCHOOLS MALE)  
26/08/2022

100-17-

**OFFICE OF THE DISTRICT ACCOUNTS OFFICE DIR LOWER AT TUMERGARA**

No. DAO/DIR Lower/PR-III, AR-3 (SS)

P-130 1318

Date: 03.03.2023

To

The Superintendent  
Pension Section Local.

Subject: LPC & SERVICE STATEMENT IN RESPECT OF MR. SHAFIQ ALI KHAN SS BPS-19 P-NO: 258099

Memo:

Consequent upon the retirement of the above named officer, his DPC, Service statement & personal file are sent herewith.

He has been paid up to and for 02.03.2023 A/N at the following rates.

Payments:

Pay	CHA	HRA	UAA	CA	MA	AR13	AR15	TA	GNT ER	RA	AR22	TOTAL
146730	100	13284	2000	5000	3650	1820	1282	11842	500	1363	14363	21494

Deduction:

GPF	B-Fund	EEF	RBDC	ITAX	TOTAL	NET PA
7180	1500	250	1600	17399	22829	187005

Service Statement:

Prior 01.02.1998 the officer concerned was holding non Gezzatted post.

PERIOD	PAY	PERIOD	PAY	PERIOD	PAY
01.02.1998	4308	01.12.1998	4505	01.07.1999	4505
01.12.1999	4702	01.01.2001	4702	01.12.2000	4899
01.12.2001	7640	01.12.2002	7930	PROMOTED TO SS	
01.02.2003	8535	01.07.2003	8535	01.12.2003	9000
01.07.2004	9000	01.12.2004	9465	01.07.2005	10885
01.12.2005	11420	01.07.2006	11420	01.12.2006	11955
01.07.2007	13745	01.12.2007	14360	01.07.2008	17250
01.12.2008	17990	01.12.2009	18730	01.07.2010	18730
01.07.2011	31600	01.12.2011	32800	01.07.2012	32800
01.12.2012	34000	01.07.2013	34000	01.12.2013	35200
01.07.2014	35200	01.12.2014	36400	PROMOTED TO BPS 18	
01.07.2015	49340	01.12.2015	51200	01.07.2016	63090
01.12.2016	65490	01.07.2017	78530	01.12.2017	81400
01.07.2018	81400	01.12.2018	84270	01.07.2019	84270
01.12.2019	87140	01.07.2020	87140	01.12.2020	90010
01.07.2021	90010	01.12.2021	92880	01.07.2022	137820
PROMOTED TO BPS 19					
27.08.2022	146730	01.12.2022	146730	01.02.2023	146730

- Retired from service on 02.03.2023 (A/N).
- Availed no regular leave at this station.
- Pay inactive w.e.f 03.03.2023
- A sum of Rs.13590/ on account of annual increment w.e.f 01.12.2022 to 28.02.2023

DISTRICT ACCOUNTS OFFICE  
DIR LOWER

PRINCIPAL  
G.H.S.S. Chakdara  
Distt:Dir (Lower)

17/3/2023

To,

The Chief Secretary  
Government of Khyber Pakhtunkhwa,  
Peshawar.

(Through proper channel)

Subject: DEPARTMENTAL APPEAL FOR ADJUSTMENT FROM DATE OF PROMOTION IN BPS-19 TO PROTECT THE PAY.

Respected Sir.


It is submitted in your kind honor that,

1. I was serving in Elementary & Secondary Education Department since 25.05.1987.
2. I was recommended as Principal BPS-19 through BSB held on 07-04-2022.
3. I was promoted to BPS-19 vide NO SO (SMIE&SED/1-2/2021/Promotion of (BS-18) dated Peshawar the April 25, 2022.
4. The placement order was made too late vide NO SO(S/M) E&SED/5-19/2022/Promotion from BS 18 to BS-19 dated August 26, 2022, which caused technical issues while fixing my pay by the Accountant Office that is not allowing me annual increment in BPS-19 as placement order has not been issued before 1<sup>st</sup> June not any condition from the date of promotion is ordered.
5. Due to the above technical. I am deprived from all the financial benefits as compared to other colleagues and a permanent inequality in my pension.

In the light of the above facts, it is requested to kindly issue a corrigendum in the order and conditioned it before 1<sup>st</sup> June or date of promotion and obliged.

Dated 08.06.2023.

Sincerely

  
Sher Ali Khan,  
Retired Principal (BS-19)  
GHSS Sarai Bala Dir Lower.

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

Appel No          /2023

Sheer Ali

(APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

**VERSUS**

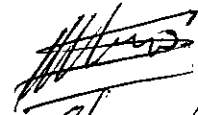
Education Dept

(RESPONDENT)  
(DEFENDANT)

I/We Appelant

Do hereby appoint and constitute **Noor Mohammad Khattak Advocate Supreme Court** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated.          /          /202



Sheer Ali Khan

**CLIENT**

**ACCEPTED**

  
**NOOR MOHAMMAD KHATTAK**  
**ADVOCATE SUPREME COURT**

  
**WALEED ADNAN**

  
**KAMRAN KHAN**

  
**UMAR FAROOQ MOHMAND**

  
**MUHAMMAD AYUB**

  
**MAHMOOD JAN**  
**ADVOCATES**

&

**OFFICE:**

Flat No. (TF) 291-292 3<sup>rd</sup> Floor,  
Deans Trade Centre, Peshawar Cantt.  
(0311-9314232)