


FORM OF ORDER SHEET

Court of _____

Appeal No. 1905/2023

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. Abdul Hamid 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  REGISTRAR</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL NO. 1905 /2023

ABDUL HAMID

VS

EDUCATION DEPTT:

INDEX

S. NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of appeal with affidavit	1-3
2.	Notification dated 25-04-2023	A	4-5
3.	Notification	B	6-16
4.	Departmental appeal	C	17
5.	Vakalat nama	18

APPELLANT

THROUGH:


NOOR MOHAMMAD KHATTAK
ADVOCATE SUPRME COURT

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

APPEAL NO. 1905 /2023

Mr. Abdul Hamid, Principal (BS-19)
GHSS Samar Bagh, 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.

..... **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. 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 is the employee of the respondent Department and is 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 25-04-2022 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) GHSS Samar Bagh Dir Lower. ***That it is pertinent to mention here that prior to the promotion the appellant was holding such post as OPS.*** Copy of the notification is attached as annexure.....**B.**
- 4- That appellant feeling aggrieved from the impugned notification dated 26.08.2022 preferred departmental appeal but the same has not been decided within the statutory period of ninety days. Copy of the Departmental appeal is attached as annexure.....**C.**
- 5- 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 adjustment notification is 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 by issuing the impugned adjustment whereby not adjusting the appellant w.e.f 25.04.2022.
- D- That the impugned notification is in violation of Article-38 (e) of the Constitution of Islamic Republic of Pakistan, 1973.
- E- 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: 18/9/23



APPELLANT

THROUGH:


**NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT**


KAMRAN KHAN


MUHAMMAD AYUB


WALEED ADNAN

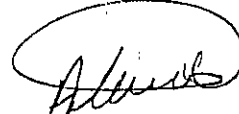

UMAR FAROOQ

&


**MAHMOOD JAN
ADVOCATES**

AFFIDAVIT

I, Abdul Hamid, Principal (BS-19) GHSS Samar Bagh 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 Feshwar the April 25, 2022

NOTIFICATION

NO. SO(SME&SED)/1-2/2021/Promotion of (BS-18) (BS-19) :- On the recommendation of Provincial Selection Board in its meeting held on 07-04-2021 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. Muzaffar Daraz 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. Noorani Gul
✓ 11	Mr. Khalid Ur Rehman	12	Mr. Javed Shehzad
✓ 13	Mr. Sher Ali Khan	14	Mr. Gul Islam
15	Mr. Daud Ur Rehman	16	Milan Zia Ud Din
17	Mr. Israj Ali	18	Mr. Sajid Aziz
19	Mr. Muhammad Shafiqat	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. Sald Badshah	32	Mr. Khan Badshah
✓ 33	Mr. Syed Latif Shah	34	Mr. Muhammad Rohim
35	Mr. Fayaz Ahmad	36	Mr. Muzaffar 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. Ihsan Ullah
47	Mr. Ahmad Saeed	48	Mr. Shahid Ali
49	Mr. Muhammad Saleem	50	Mr. Muhammad Tahir
✓ 51	Mr. Salim 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. Farzad Ali Khan
59	Mr. Warqa 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. Aqrin Sidu	68	Mr. Muhammad Jalil Khan
69	Mr. Farhan Ali	70	Mr. Shafiq Ud Din

Signature

Signature
 Director
 Elementary & Secondary Education
 Government of Punjab

Signature

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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 Ahmad
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 urRehman	12	Mr. TayyibShehzad
13	Mr. Sher ali Khan	14	Mr. Gul Islam
15	Mr. Daud Ur Rehman	16	Mian Zia Ud Din
17	Mr. IsrajAli	18	Mr. Sajid Aziz
19	Mr. Muhammad Shafiq	20	Mr. Jehan Zeb
21	Mr. SairUllah Shah	22	Mr. Hayat Muhammad
23	Mr. Khizar Hayat	24	Mr. Habib urRehman
25	Mr. Abdur Rashid	26	Mr. Muhammad Anwar
27	Mr. Faiz Ur Rehman	28	Mr. Nadeem Sultan
29	Mr. Amin UlHag	30	Mr. Javed Akhtar
31	Mr. Said 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. Fazal Rabi
41	Mr. Faidr Khan	42	Mr. Tariq Farooq
43	Mr. Zain Ullah	44	Mr. Hamid Hussain
45	Mr. Abdul Haim	46	Mr. IhsanUllah
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. Warqa Hussain	60	Mr. Muhammad Wakeel
61	Mr. abid Hussain	62	Mr. Nisar Ahmad
63	Mr. Imtiaz Ali	64	Mr. BakhtRawan
65	Mr. Mir Aslam	66	Mr. Jehan Zeb
67	Mr. Akram Said	68	Mr. Muhammad Jalil Khan
69	Mr. Farman Ali	70	Mr. SharaUd Din

85	Mr. Akhtar Abbas	86	Mr. Muhammad Alam
87	Mr. Akhtar Ali	88

2. The officers on promotion will remain on probation for a period of one year, in terms of Section-6 (21) 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.

Handwritten: 25-4-20

(SYEDA ZAINAB NAQVI)
SECTION OFFICER (SCHOOLS MALE)

Handwritten: Akhtar
Principal
G.M.S. District
District Office

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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.
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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

1 B
-6

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, Abbotabad	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 GHSS 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

22	Mr. Hayat Muhammad Principal (BS-13)	Vice Principal (BS-18) GHSS Dakki, Charsadda	Principal (BS-19) GHSS Harl Chand, Charsadda	A.V.P
23	Mr. Khizar Hayat Principal (BS-19)	Vice Principal (BS-18) GHSS Jallozal, Nowshera	Principal (BS-19) GHSS Jallozal, 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 Chanai, 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, Manshera	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

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 Painsa Khel, Bannu	Principal (BS-19) GHS Nar Muzaffar, District Lakkai 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

-9-



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 -10-
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 Fatima, 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

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. Saïd Muhammad Principal (BS-19)	Subject Specialist (English) BS-18 GHSS Warl Dir (Upper)	Principal (BS-19) GHSS Duran Dir (Upper)	A.V.P
71	Mr. Habib Ullah Principal (BS-19)	Vice Principal (BS-18) GHSS Abo Khan, SDW Bannu	Principal (BS-19) GHS Haveli Khed, 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 Tangi Charuadda	A.V.P
74	Mr. Shah Jehan Principal (BS-19)	Subject Specialist (English) BS-18 GHSS Takkar, Mardan	Principal (BS-19) GHSS Kalain 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 Shamozaï 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

-12-

82.	Mr. Hakim Ullah Principal (BS-19)	Principal (BS-18) GHS Kotka Gul Akram, SDW Bannu	Principal (BS-19) GHSS Kiri Khosora, D.I. Khan	A.V.P
83.	Mr. Akhtar Abbas Principal (BS-19)	Instructor (BS-18) RPDC (Male) D.I. Khan	Principal (BS-19) GHSS Rahmani Khal, D.I. Khan.	A.V.P
84.	Mr. Muhammad Alam Principal (BS-19)	Principal (BS-18) GHS Barikot, Swat	Principal (BS-19) GHSS Kanju, Swat	Vice S.No.104
85.	Mr. Akhtar Ali Principal (BS-19)	Principal (BS-18) GHS Chitor Swat	Principal (BS-19) GHSS Bandal, Swat	A.V.P

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) Chittabatta 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

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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 Fatima, 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 Khari 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 Doaba Hangu.	A.V.P
124	Mr. Waheed Ullah IPE (BS-17)	GHSS Dallah 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

16-

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.

Bagir Ali
26/08/2022

(BAGIR ALI)
SECTION OFFICER (SCHOOLS MALE)

"C"
-17-

To

The chief secretary
Government of Khyber Pakhtunkhwa,
Peshawar.

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


Respected Sir,

It is submitted in your kind honor that:

1. I have been serving in Elementary and Secondary Education Department since 31-03-1990 and worked as Incharge Principal in DPS-19 vide NO.SO(SM)E&SED/7-1/2020/Posting/Transfer/General
2. I was recommended as Principal BPS-19 through PSB held on 07-04-2022.
3. I was promoted to BPS-19 vide NO.SO(SM)E&SED/1-2/2021 Promotion of (BS-18) to (BS-19) TC 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 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 1st June not any condition from the date of promotion is ordered.
5. Due to the above technical issues if not redressed, I will be deprived from all the financial benefits as compared to other colleagues and a permanent inequality on my pension after retirement.

In the light of above facts it is requested to kindly issue a corrigendum in the order and conditioned it from the date of occupying principal post vide NO.SO(SM)E&SED/7-1/2020/Posting/Transfer/General; or date 18/08/2020 Date of promotion vide NO.SO(SM)E&SED/1-2/2021 Promotion of (BS-18) (BS-19) TC; date 25/04/2022 or before 1st June 2022.

Dated: 08/06/23


Sincerely
Abdul Hamid
Principal BPS-1
GHSS Samar Bag
Dir (Lower)

VAKALATNAMA
BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

Appeal No /2023

Abdul Hamid

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS


Education Deptt

(RESPONDENT)
(DEFENDANT)

I/We Appellant

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. / /2023


Abdul Hamid
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 3rd Floor,
Deans Trade Centre, Peshawar Cantt.
(0311-9314232)