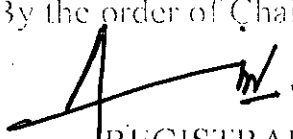


FORM OF ORDER SHEET

Court of _____

Appeal No. 1897/2023

| 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. Salar Islam Tariq 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. 1897 /2023

SALAR ISLAM TARIQ

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. 1897 /2023

Mr. Salar Islam Tariq, Principal (BS-19)
GHSS Tehkal Payan Peshawar.

..... 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 Tehkal Payan Peshawar. 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: _____


APPELLANT

THROUGH:


**NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT**


KAMRAN KHAN


MUHAMMAD AYUB


WALEED ADNAN


UMAR FAROOQ

&


**MAHMOOD JAN
ADVOCATES**

AFFIDAVIT

I, Mr. Salar Islam Tariq, Principal (BS-19) GHSS Tehkal Payan Peshawar, 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 Peshawar, the April 25, 2022

NOTIFICATION

NO. SO(SM)E&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. 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. Noor-ul-Qul |
| 11 | Mr. Khalid Ur Rehman | 12 | Mr. Javed Shehzad |
| 13 | Mr. Sher Ali Khan | 14 | Mr. Gul Islam |
| 15 | Mr. Daud Ur Rehman | 16 | Mr. Zia Ud Din |
| 17 | Mr. Israj Ali | 18 | Mr. Sajid Aziz |
| 19 | Mr. Muhammad Shafiq | 20 | Mr. Jehan Zeb |
| 21 | Mr. Sair Ullah Shah | 22 | Mr. Hayat Muhammad |
| 23 | Mr. Khizar Hayat | 24 | Mr. Habib Ur Rehman |
| 25 | Mr. Abdul Rashid | 26 | Mr. Muhammad Anwar |
| 27 | Mr. Faiz Ur Rehman | 28 | Mr. Nadeem Sultan |
| 29 | Mr. Amn Ul Huq | 30 | Mr. Javed Akhtar |
| 31 | Mr. Saad Badshah | 32 | Mr. Khan Badshah |
| 33 | Mr. Syed Latif Shah | 34 | Mr. Muhammad Rahim |
| 35 | Mr. Fayaz Ahmad | 36 | Mr. Mazfar Shah |
| 37 | Mr. Mehboob Ur Rehman | 38 | Mr. Lal Wadood |
| 39 | Mr. Younis Ali Khan | 40 | Mr. Fazal Rabi |
| 41 | Mr. Farid Khan | 42 | Mr. Tariq Farooq |
| 43 | Mr. Zain Ullah | 44 | Mr. Hamid Hussain |
| 45 | Mr. Abdul Hamid | 46 | Mr. Nisar Ullah |
| 47 | Mr. Ahmad Saeed | 48 | Mr. Shahid Ali |
| 49 | Mr. Muhammad Saleem | 50 | Mr. Muhammad Tahir |
| 51 | Mr. Salar Islami Tariq | 52 | Mr. Muhammad Ayaz Shah |
| 53 | Mr. Gul Nawab Khan | 54 | Mr. Anis 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. Imroz Ali | 64 | Mr. Bakht Rawan |
| 65 | Mr. Mir Aslam | 66 | Mr. Jehan Zeb |
| 67 | Mr. Akram Sult | 68 | Mr. Muhammad Jalil Khan |
| 69 | Mr. Farman Ali | 70 | Mr. Sharaf Ud Din |

Advised

M. J. Khan
 Regional Officer
 Peshawar

BETTER COPY OF THE PAGE NO. 4

**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 Shafiqat | 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 UlHaq | 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. Faird 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. SharafUd Din |

-5-

| | | | |
|----|------------------|----|-------------------|
| 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 (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.

25-6-17
 (SYEDA ZAINAB NAQVI)
 SECTION OFFICER (SCHOOLS MALE)

Accepted
Mansoor
 PRINCIPAL
 G.H.S. No. 1, 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

B
-6

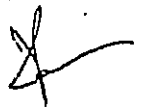
NOTIFICATION

Dated Peshawar the August 26, 2022

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 Bagnetar, 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 Jehangri, 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-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 Jallozai, Nowshera | Principal (BS-19) GHSS Jallozai, 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 |

-8-

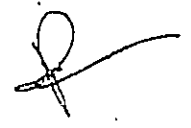


| | | | | |
|----|---|--|--|---------------------|
| 33 | Mr. Syed Latif Shah Principal (BS-19) | Principal (BS-18) GCMHS No.4 Kohat | Principal (BS-19) GHSS Manaria, Swabi | A.V.P |
| 34 | Mr. Muhammad Rahim Principal (BS-19) | Principal (BS-18) GHSS Painda Khel, Bannu | Principal (BS-19) GHS Nar Muzaffar, 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 |

-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 |
| 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 Banrian 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 |



| | | | | |
|----|---|---|--|-----------------|
| 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 Bagnotar, 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 Dugan Di (Upper) | A.V.P |
| 71 | Mr. Habib Ullah Principal (BS-19) | Vice Principal (BS-18) GHSS Abo Khan, SDW Bannu | Principal (BS-19) GHS Hasebi 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 Tangi Charardda | A.V.P |
| 74 | Mr. Shah Jehan Principal (BS-19) | Subject Specialist (English) BS-18 GHSS Takkar, Mardan | Principal (BS-19) GHSS Kalarn 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 |

| | | | | |
|----|---|---|---|------------------|
| 82 | Mr. Hakim Ullah Principal (BS-19) | Principal (BS-18) GHS Kotka Gul Akram, SDW, Bannu | Principal (BS-19) GHSS Krl Khawara, 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 Khel, 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 Bandai, 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) Chittaballa 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 Marwat | 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 Taihatta 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-

[Signature]

| | | | | |
|-----|--|---|---|-----------------|
| 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 Kheshgi 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 Ndoor 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 Kheshgi 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 |

15-

| | | | | |
|-----|--|---|---|------------------|
| 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 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 Towarsak District Buner | Principal (BS-19) GHSS Pear 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

To,

The Chief Secretary
Government of Khyber Pakhtunkhwa,
Peshawar.

-17-

"C"

(Through proper channel)

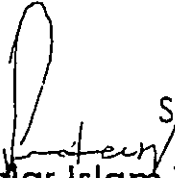
Subject: DEPARTMENTAL APPEAL FOR ADJUSTMENT FORM DATE OF PROMOTION IN BPS-19 TO PROTECT THE PAY.

Respected Sir,

1. It is submitted in your kind honor that I have been serving in Elementary and Secondary Education Department since my appointment.
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&ESD/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/S: 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 SOISMIE&SED/7-1/2020/Posting/Transfer/General: or date 18/08/2020 Date of promotion vide NO.SOISMIE&SED/1-2/2021/Promotion of (BS-18) (BS-19) TC: date 25/04/2022 or before 1st June 2022.

Dated: 08.06.2023

Sincerely

Salar Islam Tariq, Principal (BS-19)
GHSS Tehkal Payan Peshawar

-18-

VAKALATNAMA
BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Appeal _____ No _____ /202³

Salim Islam Tariq

(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. _____ / _____ /202


CLIENT

ACCEPTED


NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT


WALEED ADNAN


UMAR FAROOQ MOHMAND


MUHAMMAD AYUB


MAHMOOD JAN
ADVOCATES

&

OFFICE:

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