

06.08.2015

Counsel for the appellant and Mr. Muhammad Saeed, S.S  
alongwith Addl: A.G for respondents present. Written reply not  
submitted. Requested for adjournment. To come up for written  
reply/comments on 07-10-2015.

  
Member

3  
Appeal No. 223/2015  
Mr. Ajmal Khan

31.03.2015

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was appointed as PST in the year 1992. That the appellant was then promoted to PSHT (BPS-15) vide order dated 13.11.2014 and was transferred from GPS Natgotha to GPS Malam. According to the Posting transfer policy of the E&SE Department, Khyber Pakhtunkhwa, Peshawar he has to be retained in his own Union Council which has been violated. Against the same impugned order the appellant preferred departmental appeal on 15.11.2014 which has not been responded within the statutory period and hence the present service appeal on 09.03.2015.

Appellant Deposited  
Security & Process Fee



Points raised at the Bar need consideration. The appeal is admitted to regular hearing subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, Notices be issued to the respondents. To come up for written reply/comments on 02.06.2015 before S.B.

  
Member

02.06.2015

Counsel for the appellant and Addl: AG for the respondents present. Learned AAG is directed to contact the respondents for submission of written reply/comments. To come up for written reply/comments on 06.08.2015 before S.B.



  
Member

Form-A

FORM OF ORDER SHEET

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

Case No. 223/2015

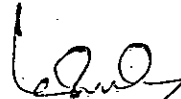
S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	16.03.2015	<p>The appeal of Mr. Ajmal Khan resubmitted today by Mr. Zafar Iqbal Urmar Advocate may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to Bench <u>III</u> for preliminary hearing to be put up thereon <u>26-3-15</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
2	26-3-15	

The appeal of Mr. Ajmal Khan son of Aleemullah Senior PSHT Distt. Swat received to-day i.e. on 09.03.2015 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Annexures of the appeal may be attested.
- 3- Annexure-A of the appeal is illegible which may be replaced by legible/better one.
- 4- Departmental appeal having no date, be dated.
- 5- One copy/set of the appeal along with annexures i.e complete in all respect may also be submitted with the appeal.

No. 296 /S.T,

Dt. 10/3 /2015

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr.Zafar Iqbal Urmar Adv. Pesh.

16/3/15

Re - Submitted after  
Completion.



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

Service Appeal No. 223 of 2015

*Ajmal Khan (Senior PHST) .....Appellant.*

**VERSUS**

*Director Elementary & Secondary Education, Khyber  
Pakhtunkhwa, Peshawar & others*

*..... Respondents*

*Index*

<b>S.No.</b>	<b>Description of documents</b>	<b>Annexure</b>	<b>Pages</b>
1.	<i>Memo of appeal</i>		1-3
2.	<i>Copy of the promotion and posting policy</i>	"A"	4-5
3.	<i>Copy of notification.</i>	"B"	6- <del>8</del>
4.	<i>Copy of departmental appeal</i>	"C"	12
5.	<i>Wakalat Nama</i>		10

Dated 07/03/2015

  
Appellant

Through



**Zafar Iqbal Urmar**  
**Advocate High Court,**  
**Peshawar.**

1

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

Service Appeal No. 223 of 2015

**A.W.F. Province**  
**Service Tribunal**

Diary No. 209

Dated 09-3-2015

Ajmal Khan Son of Aleem Ullah (Senior PHST)  
R/o Masterabad, P.O Zarkhela, Tehsil Bari Kot District Swat.  
.....Appellant.

**VERSUS**

- 1- Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 2- District Education Officer (Male) Swat.
- 3- Sub-Divisional Officer, (Male) District Swat at Gulqada.
- 4- Muhammad Tariq PSHT at GPS, Natmaira, Swat.
- 5- Govt of KPK through Secretary Education, Khyber Pakhtunkhwa Peshawar.

..... Respondents

**Filed to Govt**  
**Registrar**

9/3/15

**APPEAL UNDER SECTION 4 OF THE**  
**SERVICE TRIBUNAL ACT 1974 FOR THE**  
**ADJUSTMENT OF APPELLANT IN THE**  
**GPS NATMAIRA FROM MALAM IN UC**  
**BARI KOT AS PER GOVERNMENT**  
**POLICY OF KHYBER PAKHTUNKHWA**  
**NO. 2412-2545-A / PROMOTION / ESTAB**  
**DATED PESHAWAR THE 21/01/2013.**

Re-submitted to Govt  
and filed.

**Registrar**  
16/3/15

Prayer;

On acceptance of this appeal, the Respondents may graciously be directed to transfer the appellant from Malam to Natmaira against the respondent No.5 according to policy of Khyber Pakhtunkhwa Government.

*Respectfully Sheweth:*

*The appellant submits as under:*

- 1- That the appellant was appointed as PST in the year 1992 in education Deptt.:*
- 2- That promotion and posting policy to the post of BPS-14 and others was promulgated by the Government of KPK in the year 2013. (Copy of the promoting & posting policy is attached as Annexure "A").*
- 3- That the respondent No.2 District Education Officer (Male) Swat issued a notification / order No.9330-9480 PSHT/ Promotion/2014 dated 13/11/2014, in which the appellant promoted as PSHT B-15 and was transferred to Malam from Natgoha. (Copy of Notification / order is attached as Annexure "B").*
- 4- That as per Government policy a senior most PST shall be promoted and posted in the nearest school in the same UC.*
- 5- That the appellant being a senior most PST at Serial No.18 at Seniority List No.948 and the respondent No.5 as at Serial No.35 at seniority list No.977 which is junior than the appellant, the appellant is therefore, entitled to be promotion and posting at Natmaira against the post of respondent No.4 at Natmaira in the same U.C but the appellant is ignore which is against letter and spirit of policy.*

(3)

6- That the posting of respondent No.5 at GPS Natmaira is also against the policy and none transfer / posting of the appellant is against the policy and as such violation of the rights of the appellant.

7- That the appellant filed departmental appeal within time but no heat was given, hence this appeal.

(copy of Dept appeal Annexure  
(C) is attached)

8- That the appeal in hand is within time.

It is, therefore, humbly prayed that on acceptance of this appeal the respondents may be directed to transfer from Malam to Natmaina against the respondent No.4 according to government policy.

Dated 07/03/2015

  
Appellant

Through



Zafar Iqbal Urmar  
Advocate High Court,  
Peshawar.



Handwritten signature/initials at the top left.

(W) Handwritten mark at the top center.



Directorate of Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

PH No. 091-9201389, 9210938,  
9210437, 9210957, 9210468  
Fax: 091-9210936 0800-33857  
No. 2412-2384 / Promotion/Estab  
Dated Peshawar the 28/01/2013.

Annexure  
43

To

All the District Education Officers,  
(Male & Female), in Khyber Pakhtunkhwa.

Subject:- Guidelines for Posting of PST B-12 on Promotion to the post of Senior PST B-14 and PSHT B-15. Or from B-12 to B-15, CT B-15 to Senior CT B-16, AT B-15 to Senior AT B-16, TT-15 to Senior TT B-16, LPT B-15 to Senior DM B-16 and PET B-15 to Senior PET B-16.

Memo:

I am directed to refer to the subject noted above and to clarify that posts of PST B-12 /Senior PST B-14/PSHT B-15 may be rationalized and re-distributed among the Primary schools in the following manner and on Promotion of PST B-12 to the post of Senior PST B-14 and PSHT B-15, may be posted as under:-

**Up gradation of Posts in Primary Schools (Female) After Rationalization @ 1-40 ratio**

S.No	School Code	Name of Primary School	Total Enrolme	Sanctioned Posts after Rationalization							
				SST B-16	CT B-15	PSHT B-15	SPST B-14	PST B-12	NQ	Callar	Chowr
1	25288	GGPMS A (JICA)	208	1	2	0	2	3	1	1	1
2	25048	GGPMS B (JICA)	306	1	2	0	2	6	1	1	1
3	25143	GGCMS C	173	1	0	0	2	3	1	1	1
4	30056	GGPS D	110	0	0	1	0	1	0	0	1
5	25204	GGPS E	160	0	0	1	1	2	0	0	1
6	25244	GGPS F	160	0	0	1	1	2	0	0	1
7	25277	GGPS G	198	0	0	1	1	3	0	0	1
8	25221	GGPS H	240	0	0	1	2	3	0	0	1
9	32912	GGPS I	285	0	0	1	2	4	0	0	1
10	25097	GGPS J	320	0	0	1	2	5	0	0	1
11	25138	GGPS K	360	0	0	1	2	6	0	0	1
12	32606	GGPS L	400	0	0	1	3	6	0	0	1
13	25278	GGPS M	440	0	0	1	3	7	0	0	1
Total			3250	3	4	10	23	50	3	3	13

**Up gradation of Posts in Primary Schools (Male) After Rationalization @ 1-40 ratio**

S.No	School Code	Name of Primary School	Total Enrolment	Sanctioned Posts after Rationalization			
				PSHT B-15	SPST B-14	PST B-12	Chowr
1	30056	GPS A	110	1	0	1	1
2	25224	GPS B	110	1	1	1	1
3	25244	GPS C	160	1	1	2	1
4	25277	GPS D	198	1	1	3	1

(جاری ہے)

ATTESTED

Handwritten signature and scribbles at the bottom.

5  
4/14

5	25221	GPS E	240	1	2	3	1
6	32912	GPS F	285	1	2	4	1
7	25097	GPS G	320	1	2	6	1
8	25138	GPS H	360	1	3	6	1
9	32606	GPS I	400	1	3	7	1
10	25278	GPS J	440	1	3	7	1
Total			2563	10	17	38	10

- Note: X
- Each Primary School (except JICA & Community Model School where SST post is sanctioned) will have one post of PSHT B-15.
  - There will be no post of PSHT B-15 & SPST B-14 in MPS.
  - No of posts of PSHT B-15, SPST B-14 & PST B-12 will not exceed the already communicated sanctioned posts.

**Posting on Promotion**

- On Promotion of PST B-12 to the post of Senior PST B-14 and PSHT B-15, may be posted in the same UCs Subject to the provisions of sanctioned post.
- Senior most PSHT B-15, SPST B-14 & PST B-12 (According to the Seniority list) may be retained in the school of their present posting and junior most may be transferred to other schools.
- In their promotion order, it should be mentioned that their Inter-sc-Seniority on lower post will remain intact.
- If anyone forego promotion, Entry to this effect may be made if his/her Service book.
- Minimum qualifications for the above posts have already been prescribed in the Service Rules notified vide Government of Khyber Pakhtunkhwa Elementary and Secondary Education Department Notification No. SO (PE) 4-5/SSRC/Meeting/2012/Teaching Cadre Dated the November 13, 2012.

I am further directed to further clarify that:

- On promotion Qari B-12 to the post of Senior Qari B-15, CT B-15 to Senior CT B-16, AT B-15 to Senior AT B-16, TT-15 to Senior TT B-16, DM B-15 to Senior DM B-16 and PET B-15 to Senior PET B-16, will be posted in High and Higher Secondary Schools
- 1/3 Qari B-12 posts will be upgraded to Senior Qari B-15, CT B-15 to Senior CT B-16, AT B-15 to Senior AT B-16, TT-15 to Senior TT B-16, DM B-15 to Senior DM B-16 and PET B-15 to Senior PET B-16 in High and Higher Secondary Schools only in Elementary and Secondary Education Department at District Level.
- No post of CT B-15, PET B-15, AT B-15, DM B-15, TT-15, will be upgraded to B-16 in Middle Schools.
- Senior most Senior CT B-16, Senior AT B-16, Senior DM B-16, Senior PET B-16, Senior TT B-16 (According to the Seniority list) may be retained in the schools of their present posting, and junior most may be transferred to other schools.

*[Signature]*  
 Director (Establishment)  
 Elementary and Secondary Education  
 Khyber Pakhtunkhwa Peshawar.

*[Large Handwritten Signature]*

Better copy of  
Annexure A

"Better Copy"

**Director of Elementary & Secondary  
Education**

**Khyber Pakhtukhwa Peshawar**

**Ph No.091-9201389, 921038**

**9210437, 9210957, 9210468**

**Fax: 091-9210936 0800-33857**

**No.2412-2545/Promotion / Estab**

**Dated Peshawar the 23/01/2013**

To:

All the District Education officers,  
(Male & Female), in Khyber Pakhtunkhwa

Subject: Guidelines for posting of PST B-12 on promotion to the post of senior PST B-14 and PSHT E-15, Qari B-12 to B-15 to Senior CT B-16 at B-15 to Senior AT B-16, TT- B-15 to Senior TT B-16, BPS 14 to Senior DM B-16 and PET B-15 to Senior PET B-16.

Memo;

I am directed to refer to the subject noted above and to clarify that posts of PST B-12 / Senior PST B-14/PSHT B-15 may be rationalized and re-distributed among the Primary Schools in the following manner and on promotion of PST B-12 to the post of Senior PST B-14 and PSHT B-15, may be posted as under:

Up gradation of posts in primary Schools (Female) After Rationalization @ 1-40 Ratio											
S.No.	School Code	Name of Primary School	Total Enrolments	Sanctioned posts after rationalization							
				SST B-16	CT B-15	PSHTB-15	SPST B-14	PST B-12	N Q	Callar	Chaw
1.	25388	GGPMS A (JICA)	208	1	2	0	2	3	1	1	1
2.	25048	GGPMS B (JICA)	306	1	2	0	2	6	1	1	1
3.	25143	GGMS C	173	1	0	0	2	6	1	1	1
4.	30056	GGPS D		0	0	1	0	1	0	0	1
5.	25204	GGPS E		0	0	1	0	1	0	0	-
6.	25244	GGPS F	160	0	0	1	1	2	0	0	1
7.	25277	GGPS G	198	0	0	1	1	3	0	0	1
8.	15221	GGPS H	240	0	0	1	1	2	0	0	1
9.	32912	GGPS I	285	0	0	1	2	4	0	0	1
10.	25097	GGPS J	320	0	0	1	2	5	0	0	1
11.	25138	GGPS K	360	0	0	1	2	6	0	0	1
12.	32606	GGPS L	400	0	0	1	3	6	0	0	1
13.	25278	GGPS M	440	0	0	1	3	7	0	0	1
Total			3250	3	4	10	23	50	3	3	13

Up gradation of posts in primary Schools (Female) After Rationalization @ 1-40 Ratio							
S.No.	School Code	Name of Primary School	Total Enrolments	Sanctioned posts after rationalization			
				PSHT B-15	SPST B-14	PST B-12	Chaw
1.	30056	GPS A		1	0	1	1
2.	25224	GPS B	110	1	1	1	1
3.	25244	GPS C	160	1	1	2	1

4.	25277	GPS D	198	1	1	3	1
5.	25221	GPS E	240	1	2	3	1
6.	32912	GPS F	285	1	2	4	1
7.	25097	GPS G	320	1	2	5	1
8.	25138	GPS H	360	1	2	6	1
9.	32606	GPS I	400	1	3	6	1
10.	25278	GPS J	440	1	3	7	1
Total			2563	10	17	38	10

Note:

- 1- Each Primary School (Except JICA & Community Model School where SST post is sanctioned) will have one post of PSHT B-15
- 2- There will be one post of PSHT B-15 & SPST B-14 in MPS
- 3- No of posts PSHT B-15 SPST B-14 & PST B-12 will not exceed the already communicated sanctioned posts.

Posting on Promotion:

- 4- On promotion of PST B-12 to the post of Senior PST B-14 and PSHT B-15, may be posted in the same UCs. Subject to the provisions of sanctioned post,
- 5- Senior most PSHT B-15, SPST B-14 & PST B-12 (According to the Seniority list) may be retained in the school of their present and junior most may be transferred to other schools.
- 6- In their promotion order it should be mentioned that their Inter-se-Seniority on lower post will remain intact
- 7- If anyone forego promotion for the above posts have already been prescribed in the Secondary Education Department No. SO (PE) 4-5/SSRC/Meeting /2012/Teaching Cadre Dated the November 13, 2012.

I am further directed to further clarify that:

- 1- On promotion Qari B-12 to the post of senior Qari B-15, to Senior CT B-16, AT B-15 to Senior AT B-16, TT-15 to Senior TT B-16, DM B-15, to Senior DM B-16 and PET B-15 to Senior PET B-16, will be posted in High and Higher Secondary Schools.
- 2- 1/3 Qari B-12 Posts will be upgraded to Senior Qari B-15, CT B-15 to Senior CT-B16, AT B-15 to Senior AT B-16, TT-15 to Senior B-16, DM B-15 to Senior DM B-16 Elementary and Secondary Education Department at District Level.
- 3- No post of CT B-15, PET B-15, AT B-15, DM B-15, TT-15, will be upgraded to B-16 in Middle Schools.
- 4- Senior most Senior CT B-16, Senior DM B-16, Senior PET B-16 Senior TT B-16 (According to the seniority list) may be retained in the schools of their present posting and junior most may be transferred to other schools.
- 5-

Sd/-

Dy Director (Estab)

Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER MALE DISTRICT SWAT

DL KADA.

NOTIFICATION

Ameytone  
4B3

Consequent upon the recommendation of departmental promotion committee and further approval of the competent authority the undersigned is pleased to issue on "School based" posting / adjustment orders of the following SPST BPS-14 to PSHT BPS-15(8500-700-29500) plus usual allowances as admissible under the rules on regular basis under the existing policy of the provincial government on the term and conditions given below with immediate effect.

S.No	SLN NO	Name of official	Present Posting		School where posted		Remarks
1	929	Said Mohd Khan	GPS	Shakaray	GPS	Sangar Managlor	Against vacant post
2	930	Muhammad Ayub	GPS	Aligram	GPS	Reema	---do---
3	931	Shabir Ahmad	GPS	Kabal	GPS	Kham Dara	---do---
4	932	Mian Tahir Jan	GPS	Islam Pur	GPS	Toor Kamar	---do---
5	933	Ashraf Ali	GPS	Kalkata Manglor	GPS	Bodai Ghar	---do---
6	934	Sher Alam Khan	GPS	Kabal	GPS	Pir Patay	---do---
7	935	Aziz Ahmad	GPS	Zara khela	GPS	Rangela bar Cham	---do---
8	936	Mian Said Ali Shah	GPS	Balogram	GPS	Kharawey	---do---
9	937	Bakht Mand	GPS	Chail Madyan	GPS	Chail	---do---
10	939	Asmat Ali	GPS	Nawakalay Mingora	GPS	Wara Sar	---do---
11	940	Bakht karim Jan	GPS	Sigram	GPS	Awar paty	---do---
12	941	Inayatullah	GPS	Khair Abad Kabal	GPS	Manja	---do---
13	942	Salim Javed	GPS	Khwaja Abad	GPS	Uzbaka	---do---
14	943	Fazal ahad	GPS	Dherai	GPS	Muhammad Baig	---do---
15	944	Anwar Ali Khan	GPS	Jamal Abad Sangota	GPS	Kandow Manglor	---do---
16	945	Afzal Khan	GPS	Shagai Sarbala	GPS	Chai Banda	---do---
17	946	Maasam Khan	GPS	Gogdara	GPS	Poladay	---do---
18	948	Ajmal Khan ✓	GPS	Nagoha	GPS	Malam	---do---
19	949	Asadullah	GPS	Barawal No:2	GPS	Balat	---do---
20	950	Muhammad Shouiab	GPS	Akhoon Kalay	GPS	Painda Shah	---do---
21	953	Aurang Zeb	GPS	Nagoha	GPS	Gal Utror	---do---

upadent

APTA - Swat -

صداقت یک سیرز ایندیشنرز  
لیاقت پلازه میدروڈوزو ملابابا سکول  
بھاکورہ سوات

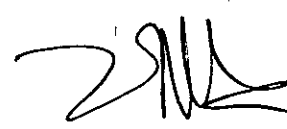
*[Handwritten signature]*

*[Handwritten signature]*

7

22	957	Abdul Hamid	GPS	Talsar Miandam	GPS	Tal Sar	---do---
23	959	Gul Zamin Khan	GPS	Amankot	GPS	Jeloo	---do---
24	960	Muhammad Zada	GPS	Jalala	GPS	Sar	---do---
25	961	Amanullah	GPS	Islam Pur	GPS	Doshey	---do---
26	964	Muhd Naeem	GPS	Aligrama	GPS	Nemakai	---do---
27	965	Shamsul Hadi	GPS	Shagai Shahgram	GPS	Kargay	---do---
28	967	Mubarak Ali	GPS	Konda	GPS	Bar Bangsh	---do---
29	968	Raham Karam	GPS	No.1 Fateh pur	GPS	Fateh pur No.1.	---do---
30	969	Kalim	GPS	Sirsanai #2	GPS	Mahak	---do---
31	970	Bakhti Ali	GPS	Qazi Abad	GPS	Jani Mar	---do---
32	971	Muhammad Iqbal	GPS	Mingora No1	GPS	Nem cha	---do---
33	973	Usman Ghani	GPS	Sambat Cham	GPS	Gharab Abad Baidara	---do---
34	974	Bakhat Minhaj	GPS	Kabal	GPS	Tall	---do---
35	977	Muhammad Tariq	GPS	Fazal Abad (B)	GPS	No.2.Nat maira	---do---
36	978	Sultan Akbar	GPS	Zwala	GPS	Kani Utror	---do---
37	979	Bakht Nawab	GPS	Chara Baba	GPS	Samsary	---do---
38	981	Bakht Afsar Khan	GPS	Arkot	GPS	Arkot	---do---
39	982	Muhammad Iqbal	GPS	Kharkai Sakhra	GPS	Narai Banda	---do---
40	987	Muhammad Sadiq	GPS	Notmera	GPS	Ramota	---do---
41	988 ✓	Fawad Ali	GPS	Chra Bab Ghelegay	GPS	Fazal Abad Gahlegay	---do---
42	989	Muhammad Jan	GPS	Deolai No.1	GPS	Malakana	---do---
43	990	Ihsanullah	GPS	Daro Gharai	GPS	Bawrai	---do---
44	991	Gowhar Ali	GPS	Bara Bamakhela	GPS	Dagai Matta	---do---
45	992	Muhammad Khan	GPS	Urdam	GPS	Bela Gabral	---do---
46	993	Sultanat Khan	GPS	Kokarai	GPS	Sangar No.1.	---do---
47	995	Ahmad Zeb	GPS	Spina Khpa	GPS	Baz Khela No.2.	---do---
48	996	Muhammad Salar	GPS	Sakhra	GPS	Bar Kabal Koo	---do---
49	997	Muhammad Iqbal	GPS	Balao	GPS	Batan Dar	---do---
50	998	Habibur Rahman	GPS	Langar	GPS	Gojar Gabral	---do---

Revised

  
**ATTESTED**

APJA Swat

صداقت بکس سیکرٹری سیشنرز  
 لیاقت پلازہ سید روڈ نوما بابا اسکول  
 چنگورہ سوات

8

51	999	Muhammad Iqbal	GPS	Baidara No:2	GPS	Chatikal Matta	---do---
52	1000	Ghayasud Din	GPS	Pir Kalay	GPS	Archalai	---do---
53	1001	Zahir Shah	GPS	Tangal odigram	GPS	Khadang	---do---
54	1002	Allim Khan	GPS	Kohay	GPS	Gorkin	---do---
55	1003	Tasnimul Haq	GPS	Bar Sher Palam#1	GPS	Ashray Awarai	---do---
56	1004	Sardar	GPS	Shangwatai Cham	GPS	Shor Shahi Shawar	---do---
57	1005	Muhd Salim	GPS	Kaldar Khwar	GPS	Satal	---do---
58	1007	Bahadar Ali	GPS	Shalpin	GPS	Jeshar	---do---
59	1008	Abdus Salam	GPS	Qazi Abad	GPS	Charai Beha	---do---
60	1010	Wahid Zaman	GPS	Hakim Abad	GPS	Chariky Azad Banda	---do---
61	1011	Syed Burhanuddin	GPS	Pirawdai	GPS	Meramai	---do---
62	1012	Fazal Wahab	GPS	Asogay	GPS	Marjanai	---do---
63	1014	Tariq Ahmad	GPS	Balogram	GPS	Kuz Motlai	---do---
64	1015	Niaz	GPS	Spina Khpa	GPS	Narkat	---do---
65	1020	Tahirul Mulk	GPS	Landay kas	GPS	Koz Bargin	---do---
66	1024	Rahman Ali	GPS	2 Chamtalai	GPS	Bar Kedam	---do---
67	1026	Akbar Shah	GPS	Nawan Kalay k/k	GPS	Jaba Pisal	---do---
68	1032	Haq Nawaz	GPS	Barawal No:2	GPS	Sar Banda	---do---
69	1033	Sayed Hassan Shah	GPS	Wali Abad	GPS	Tamba Gat	---do---
70	1034	Amanullah Khan	GPS	Daro Gharai	GPS	Zor Chail	---do---
71	1035	Aleem Shah	GPS	Meramai	GPS	Madiyat	---do---
72	1037	Sher Malik	GPS	Asala Bala	GPS	Asrait Kalam	---do---
73	1038	Arshad Khan	GPS	No.1 Fateh pur	GPS	Yaka	---do---
74	1041	Muhd Zainul Islam	GPS	Binorai	GPS	Chancharay	---do---
75	1043	Ajab Khan	GPS	Langar Khwazakhela	GPS	Zari Nal	---do---
76	1044	Kewal Ram	GPS	Mingora No.3	GPS	Sardary Manglor	---do---
77	1046	Ibrahim Shah	GPS	Sorai Sharifai#1	GPS	Sory Sharafpay No.2	---do---
78	1047	Roshan ali	GPS	Tang Banr (M)	GPS	Ma Banr Qalagay	---do---
79	1049	Mohammad Azam Khan	GPS	Lakhar	GPS	Ghaund Paty Shopin	---do---
80	1050	Fazal Subhan	GPS	Gat	GPS		---do---

APTA-Sweet

صداقت بیک سیرزای عزیز  
لیات بازاره سید و روز نو ملا بابا سکر  
بکوره سوات

81	1052	Mian Gul Sherin	GPS	Rahim Abad No.2	GPS	Aboha No.3	---do---
82	1053	Javed Iqbal	GPS	Nagoha	GPS	Matiltan	---do---
83	1054	Hazrat Hussain	GPS	Madyan	GPS	Par Desha	---do---
84	1055	Jalat Khan	GPS	Karin Gabral	GPS	Jamra	---do---
85	1058	Shakirullah	GPS	M.G Shahed	GPS	Kargaloo	---do---
86	1061	Ahmad Zeb	GPS	Zarakhela	GPS	Sardan	---do---
87	1062	Muhammad Anwar	GPS	Sambat	GPS	Roringar	---do---
88	1072	Sikandar Shah	GPS	Sirsanai #1	GPS	Sharif Abad	---do---
89	1074	Izharullah Khan	GPS	Nawan Kalay 2	GPS	Doghalgy Beha	---do---
90	1075	Sadiq Akbar	GPS	Shin	GPS	Dewan Bala Kot	---do---
91	1076	Iqbal Hussain	GPS	Madyan	GPS	Kunda	---do---
92	1077	Mian Syed Munir	GPS	Bara Sakhra	GPS	Garai Lalkoo	---do---
93	1078	Sultana Khan	GPS	Shamozai	GPS	Anakar	---do---
94	1079	Ahmad Habib	GPS	Hakim Abad	GPS	Samai	---do---
95	1080	Muhammad Sabir	GPS	Churkhai	GPS	Manz Gat	---do---
96	1083	Muhammad Ayaz	GPS	Koza Bandai #2	GPS	Delay	---do---
97	1085	Amir Zada	GPS	Giri Lagan	GPS	Kuza Charay	---do---
98	1089	Gul Zamin Khan	GPS	Mingora No4	GPS	Pishmal No.1	---do---
99	1090	Saeedullah	GPS	Bahrain	GPS	Zor Kalay	---do---
100	1091	Saeed Ahmad	GPS	Bandai	GPS	Sia	---do---
101	1092	Ghulam Sarwar	GMPS	Landy Shah	GPS	Manai	---do---
102	1095	Munawar Sher	GPS	Koza Bandai #2	GPS	Dardyal	---do---
103	1096	Sarfraz Khan	GPS	Sigran	GPS	Bela Bataka	---do---
104	1097	Mian Rahim Khan	GPS	Panjigram	GPS	Achar No.1	---do---
105	1099	Iftikhar Alam Khan	GPS	Bara Bandai #2	GPS	Pianwarai	---do---
106	1101	Manzoor Ali	GPS	Kedam	GPS	Kedam	---do---
107	1103	Amjad Ali	GPS	Barikot	GPS	Pishmal No.2	---do---
108	1104	Muhammad Zeb	GPS	Bara Durushkhela	GPS	Bala Soor Ashray	---do---
109	1105	Mian Abdul Ahad	GPS	Shin	GPS	Sida Shin	---do---
110	1107	Sheikh Farid	GPS	Shaloon	GPS	Cham Garai	---do---
111	1108	Muhammad Nazir	GPS	Ashoka	GPS	Ashoka	---do---

APTA-Sual

صداقت بک میرزا بیگ شہزاد  
لیات پلازہ سید روڈ نزد مایا بازار  
پاکستان

ATTESTED





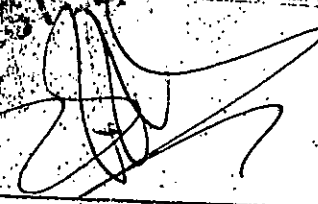
(10)

112	1112	Abdullah Khan	GPS	Gul Derai K/Kh	GPS	Ona Toor Wall	---do---
113	1113	Muhammad Hanif	GPS	Guligram	GPS	Aryana No.2	---do---
114	1115	Ahmad Taher Shah	GPS	Galooch #1	GPS	Shah Bekka	---do---
115	1116	Zalam Bar Khan	GPS	Jare Chinkolai	GPS	Tangai Banda	---do---
116	1117	Abdul Wahid	GPS	Rahim Abad No.2	GPS	Bar Achar	---do---
117	1118	Abdul Ghafoor	GPS	Darolal 2	GPS	Ketal Riamat	---do---
118	1119	Muhammad Nawab	GPS	Landal Shah	GPS	Inzar Kulalay	---do---
119	1120	Niaz ahmad	GPS	Charge Shah	GPS	Chingai Sar	---do---
120	1125	Sahib Zada	GPS	Kasoon	GPS	Lal Shish	---do---
121	1126	Muhammad Iqbal	GPS	Kohistani Banda	GPS	Chit Karai	---do---
122	1128	Sham Sher Ali	GPS	Gadi	GPS	Bara Gat	---do---
123	1134	Shah wali Khan	GPS	Sambat	GPS	Gam Seer No.2	---do---
124	1137	Bakht Karam	GPS	Panr	GPS	Mandan	---do---
125	1145	Iftikhar Ahmad	GPS	Dadhara	GPS	Yakh Tangai	---do---
126	1146	Muht Iqbal	GPS	Kanga	GPS	Bair	---do---
127	1149	Akhtar Biland	GPS	Amankot	GPS	Haji Abad S/Sharif	---do---
128	1152	Ali Akbar	GPS	Koz Shawar	GPS	Pansat	---do---
129	1157	Karimullah	GPS	Gulibagh	GPS	Shinkoo	---do---
130	1159	Muhammad Nasar	GPS	Parrai	GPS	Kass Kalam	---do---
131	1161	Rahmat Ali	GPS	Koza Bandai#2	GPS	Chor Penowarai	---do---
132	1162	Akbar Hussain	GMPS	Matta Bazaar	GPS	Nal Kot	---do---
133	1164	Sulatan Mahmood	GPS	Fazal Abad (D)	GPS	Sekay	---do---
134	1165	Abdur Rahman	GPS	Chatoria	GPS	Shandai	---do---
135	1166	Fazal Subhan	GPS	Dehro Cham	GPS	Sar Khazana	---do---
136	1169	Rahmat Shah Mian	GPS	Tarogey	GPS	Then Toor wall	---do---
137	1171	Aqal Zada	GPS	Chelam Riamat	GPS	Badai	---do---
138	1172	Inamullah	GPS	Mingora No2	GPS	Bar Jabar	---do---
139	1173	Riaz Ahmad	GPS	Amankot	GPS	Kuz Kad	---do---
140	1176	Zafar Javid	GPS	Shahced Baba Janju	GPS	Dherai Chinglalai	---do---
141	1179	Luqman Ali	GPS	Gwaleral	GPS	Swati	---do---
142	1180	Nadar Khan	GPS	Baldara No:2	GPS	Onra Dherai	---do---

APPA Seval

صداقت بک پبلز اینڈ سٹیشنرز  
لیاقت بلازہ سید روڈ نزد ملانیا اسکول  
پنکوہ صاحب

ATTESTED



(1P)

143	1181	Amir Zeb	GPS	Bahrain	GPS	Jaga	---do---
144	1185	Fazal Mabood	GPS	Guli Bagh	GPS	Shalikeyar Madyan	---do---
145	1186	Roshan ali Khan	GPS	Balalay	GPS	Saidara Matta	---do---
146	1187	Abdul Latif	GPS	Odigram No2	GPS	Kandowgy Gat	---do---

TERM AND CONDITION

- (1) They would be on probation for a period of one year extendable for another year.
- (2) They will be governed by such rules and regulations as may be issued from time to time by the government.
- (3) Their services can be terminated at any time, if their performance is found unsatisfactory during the probation period. In case of misconduct they shall be preceded under the rules framed from time to time by the government.
- (4) Charge report should be submitted to all concerned.
- (5) Their inter-se-seniority on lower post will remain intact.
- (6) No TA/DA is allowed for joining duty.
- (7) In case of any discrepancy or misreporting found in academic / professional documents in respect of the above officials, their promotion shall stand cancelled.
- (8) Their posting will be school based and they shall have to serve at the place of posting and hence not transferable to any other stations.
- (9) Before handing over charge their documents may once again be checked and in case of any discrepancy as per prescribed qualification they may not be handed over charge.

(SYED MUKHTYAR)  
SUB DIVISIONAL EDUCATION OFFICER  
MALE DISTRICT SWAT

Endst: No.9330-9480/ PSHTB-15/Promotion/2014

Dated: 13/11/2014

Copy of the above is forwarded for information and further necessary action:-

1. The Director (E&S) Education K.P.K. Peshawar.
2. The Deputy Commissioner swat.
3. The District Accounts officer swat.
4. The District Education officer Male swat.
5. All the circle ASDEO Male local office.
6. The officials concerned.
7. PA to D.E.O. Male local office.

صداقت بک سیکرز اینڈ اسٹیٹمنٹرز  
لیاقت پلازہ سید روڈ نزد ملا بابا سکول،  
ینگورہ سوات

SUB DIVISIONAL EDUCATION OFFICER  
MALE DISTRICT SWAT

APTA-Swat

12  
B

Annexure  
up 3

TO  
THE DIRECTOR  
ELEMENTARY AND SECONDARY EDUCATION  
GOVT. OF KHYBER PAKHTUNKHWA

Through Proper Channel

Subject: Departmental Appeal.

Dear Sir,

With due respect it is humbly submitted that I have been promoted to PSHT (B-15) Vide order No. 9330-9480/PSHTB-15/Promotion/2014 Dated 13/11/2014 and transferred from GPS Nagoha U/C Barikot and adjusted at GPS Malam Vide order No. 9330-9480/PSHTB-15/Promotion/2014 Dated 13/11/2014 at S.No 18.

In the same order Mr. Muhammad Tariq of GPS Fazal abad Barikot U/C Barikot has also been promoted to PSHT B-15 and adjusted against the vacant post PSHT at GPS Nat maira No. 2 U/C Barikot Vide order No. 9330-9480/PSHTB-15/Promotion/2014 Dated 13/11/2014 at S.No 35.

According to the Posting on Promotion Policy of Govt. KPK, promotion to PSHT (B-15) Para No.4 "On promotion of PST B-12 to the post of senior PST B-14 and PSHT B-15 may be posted in the same U/Cs Subject to the provision of sanctioned post and Para No. 5 Senior most PSHT B-15, SPST B-14 & PST B-12 (According to seniority list) may be retained in the school of their present posting and joiner most may be transferred to other schools (policy enclosed)."

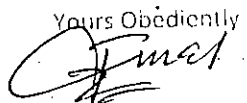
My seniority No. is 948 and the seniority No. of Muhammad Traiq is 977. GPS Nagoha and GPS Nat Maira No.2 are in the same U/C (BARIKOT).

As I am senior than Muhammad Triq PSHT-according to the seniority list issued by the SDEO (M)/DEO (M) Swat.

Therefore it is requested to kindly consider my departmental appeal according to the policy and seniority list against Muhammad Traiq PSHT presently adjusted at GPS Nat Maira No2 U/C Barikot please.

- Encls: 1. Promotion Policy  
2. Order Copy.

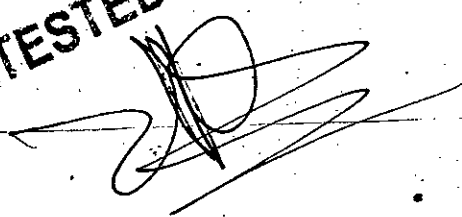
Dated 15<sup>11</sup> 2014

Yours Obediently  
  
AJMAL KHAN  
GPS Nagoha.

- Copy to:-  
1. DEO (M) SWAT  
2. DY. DEO (M) SWAT  
3. SDEO (M) SWAT.

Yours Obediently  
  
AJMAL KHAN  
GPS Nagoha.

**ATTESTED**





2 پنجاب  
بنام

مورث  
مقدمہ  
دعوی  
جرم

## باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ  
آن مقام کیلئے

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز  
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ پر حلف دینے جواب دہی اور اقبال دعویٰ اور  
انصورت ڈگری کرنے اجراء اور وصولی چیک دروپیہا عرضی دعویٰ اور درخواست ہر قسم کی تصدیق  
زراریں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برآمدگی  
اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت  
مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے  
تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے  
اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوا کے مقدمہ کے  
سبب سے و ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں  
گے۔ کہ پیروی مذکور کریں۔ اہذا وکالت نامہ لکھ دیا کہ سندر ہے۔