

27.1.2016


None present for appellant. M/S Khurshid Khan, SO and Hameed-ur-Rehman, AD (lit.) alongwith Addl: A.G for respondents present. Written reply submitted. The appeal is assigned to D.B for rejoinder and final hearing for 2.3.2016. The restraint order shall continue.


Chairman

02.3.2016

Counsel for the appellant (Mr. Nazir Ahmad, Advocate) and Government Pleader (Mr. Muhammad Jan) with Khursheed Khan, SO for the official respondents present. Rejoinder submitted, which is placed on file. Arguments heard and record perused. Vide our detailed judgment of to-day in connected Service Appeal No. 928/2015, titled "Muhammad Sawar Versus Government of KPK through Secretary E&SE, Peshawar etc.", this appeal is also disposed off as per detailed judgment. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
02.3.2016


MEMBER


MEMBER

25.11.2015

Appellant with counsel, M/S Khurshid Khan, SO and Hameed-ur-Rehman, AD (lit.) alongwith Addl: A.G for official respondents No. 1 and 2 present. Private respondent No. 3 is not in attendance. Fresh notice be issued to private respondent No. 3. To come up for written reply/comments on 4.2.2016 at Camp Court Swat as the matter pertains to the territorial limits of Malakand Division. Status-quo be maintained.


Chairman

Note Below

25.11.2015

Learned counsel for the appellant submitted application for deletion the names of private respondent No. 3 from the panel of respondents. In view of the application, the name of private respondent No. 3 stand deleted. To come up for written reply/comments on 24.12.2015 at Peshawar. Status-quo be maintained.


Chairman

24.12.2015

Since 24.12.2015 has been declared as Public Holiday therefore, the case is adjourned to for the same 27.1.2016.


Reader

26.08.2015

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was promoted from BPS-17 to BPS-18 but Wrongly posted to GHS Khal District Dir (Lower) vide impugned order dated 16.4.2015 regarding which he preferred departmental appeal on 7.5.2015 which was not responded and hence the instant service appeal on 19.8.2015.

That similarly placed employees were adjusted to the nearby home towns while appellant ignored despite availability of vacancy at GHS Ouch Dir (Lower) and private respondent No. 3, a BPS-17 Officer, accommodated against the said post.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 25.11.2015 before S.B. Notice of application be also issued for the date fixed. Status-quo be maintained.


Chairman

Appellant Deposited
Security & Process Fee





71 - 5 - 02

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 929/2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	19.08.2015	<p>The appeal of Mr. Sher Ali Khan presented today by Mr. Nazir Ahmad 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>
2	24-8-15	<p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>26-8-15</u></p> <p style="text-align: right;">  CHAIRMAN </p>

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No 929 /2015

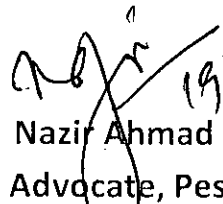
Mr. Sher Ali Khan **versus** Govt: of KP through Secretary (E&SE) & others

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Appellant

Through


19/4/2015
Nazir Ahmad
Advocate, Peshawar
Cell: 0301-8571879

①

IN THE KP SERVICE TRIBUNAL, PESHAWAR.

Appeal no. 929/2015

Mr. Sher Ali Khan Subject Specialist Economics BS-18 Government Higher Secondary Khal District Dir (Lower)Appellant

Versus

**K.P. Province
Service Tribunal**

Diary No. 973

Dated 19-8-15

1. Government of KP through Secretary Elementary and Secondary Education Department, (E&SE), Khyber Pakhtoonkhwa Peshawar.
2. Director Elementary and Secondary Education (E&SE) Khyber Pakhtoonkhwa, Peshawar.
- ③ Mr. Sher Zada Subject Specialist in Economics BS-17 Government Higher Secondary School Ouch Dir (Lower).....Respondents.

Appeal under Section 4 of the KP Service Tribunal Act, 1974 against the impugned Notification No.SO(S/M) E&SED/1-3/2014/Promotion BS-17 to BS-18/4-tier 2nd Phase dated 16.4.2015 whereby the Appellant has correctly promoted from BS-17 to BS-18 but is wrongly posted as Subject Specialist Economics BS-18 Government Higher Secondary Khal District Dir (Lower) instead of Subject Specialist in Economics BS-18 Government Higher Secondary School Ouch Dir (Lower) whereas the post of BS-18 is lying vacant and Respondent no 3 being BS-17 is working against it.

Prayer:

ON acceptance of this Appeal the Appellant be posted against the post of BS-18 which is lying vacant in Government Higher Secondary School Ouch Dir (Lower) and Respondent no 3 being BS-17 is working against it.

Respectfully Sheweth:- The need for the instant Appeal arises due to the following facts:

*Deleted
25-11-15
Ref-NO 3*

19/8/15

Facts:-

1. That the Competent Authority on the recommendation of the Provincial Selection Board promoted the Appellant from BS-17 to BS-18 through Notification No.SO(S/M) E&SED/1-3/2014/Promotion BS-17 to BS-18/4-tier 2nd Phase dated 16.4.2015 but posted him against the vacant post of Subject Specialist Economics BS-18 Government Higher Secondary Khal District Dir (Lower) instead of vacant post Government Higher Secondary School Ouch Dir (Lower) and Respondent no 3 being BS-17 is working against BS-18 against the Rules..... **(Annexure-A).**
2. That the Respondent no 1 sanction and accorded to the upgradation of the 4-tier formula the total sanction strength of 5164 posts i.e. BS-20, BS-19, BS-18, BS-17 where the post of BS-18 is created at Government Higher Secondary School Ouch Dir (Lower).
3. That the Appellant felt that in the posting in impugned order dated 16.4.2015 there is mistakes which the Respondents no 1 and 2 have in advertently made and the Appellant along with others have posted at the wrong place, hence filed an application for corrigendum on 19.4.2015 with the hope that the Respondent no 1 and 2 would look into the matter and while placing other wrongly posted instructor will post the Appellant at the right place i.e. Government Higher Secondary School Ouch Dir (Lower)..... **(Annexure-B).**
4. That the said corrigendum/adjustment is forwarded to the District Education Officer for further favourable Consideration by Principal Government High School Chakdara Dir with due letter of District Education Officer Male District Dir Lower on 26.5.2015 to the Respondent no 2..... **(Annexure-C).**
5. That upto the utmost surprise of the Appellant the other similarly placed Subject Specialist BS-18 were posted and adjusted through Corrigendum Notification No.SO(S/M) E&SED/1-3/2014/Promotion BS-17 to BS-18/4-tier 2nd Phase on 23.4.2015 but the Corrigendum Application of the Appellant was ignored absolutely, which the Appellant felt discriminatory and against the principle of equality and law..... **(Annexure-D).**

6. That being aggrieved of the Notification No.SO(S/M) E&SED/1-3/2014/Promotion BS-17 to BS-18/4-tier 2nd Phase dated 16.4.2015 and Notification No.SO(S/M) E&SED/1-3/2014/Promotion BS-17 to BS-18/4-tier 2nd Phase dated 23.4.2015 the Appellant filed a Departmental Appeal but ninety days has been elapsed but no reply has given so far and the case of the Appellant is still pending as before..... (Annexure-E).
7. That Section 4 read with proviso (a) hence this Appeal is preferred on the following grounds.

Grounds:-

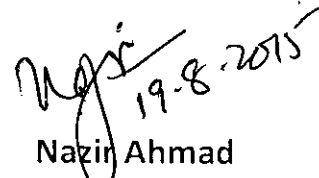
- A. That Notification No.SO(S/M) E&SED/1-3/2014/Promotion BS-17 to BS-18/4-tier 2nd Phase dated 16.4.2015 whereas the Subject Specialists BS-18 are posted after promotion at a place near to their place of residence and that the Appellant is not posted as such but BS-17 (Respondent no 3) is against law, principle of justice and service Rules.
- B. That Rule 7 (2) of KP Civil Servant (Appointment, Promotion and Transfer) Rules 1989 inter alia reveals that Appointment by transfer shall be made from amongst the person holding appointment on regular basis in the same basic pay scale, in which the posts to be filled, exists, but in the case of the Appellant this Rule is not taken notice of.
- C. That the wife of the Appellant is serving in Refugees and is posted at Chakdara Lower Dir where the Appellant before promotion was also posted there and now the near station to Chakdara to have easy access for caring his family is Government Higher Secondary School Ouch Dir (Lower) where the Respondent no 3 is posted against the above mentioned rules.
- D. That Notification No.SO(S/M) E&SED/1-3/2014/Promotion BS-17 to BS-18/4-tier 2nd Phase dated 23.4.2015 the other similarly placed and posted were posted and adjusted with their satisfaction but the Appellant is treated arbitrary, malafidely and in discriminatory manner which is a violation of Article 25 of the Constitution of Islamic Republic of Pakistan.

- E. That under Section 24 A of the General Clauses Act the state functionaries must act fairly, justly and in a transparent manner but in the case of the Appellant the Respondent acted otherwise.
- F. That under Article 4 of the Constitution of Islamic Republic of Pakistan every citizen shall be treated in accordance with law hence the Respondent require an order to act as such and post the Appellant as per his prayer.

Therefore it is humbly prayed that on acceptance of this Appeal the order may be issued as prayed above.


Appellant

Through


19.8.2015
Nazir Ahmad
Advocate, Peshawar.

5

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No _____/2015

Mr. Sher Ali Khan **versus** Govt: of KP through Secretary (E&SE) & others

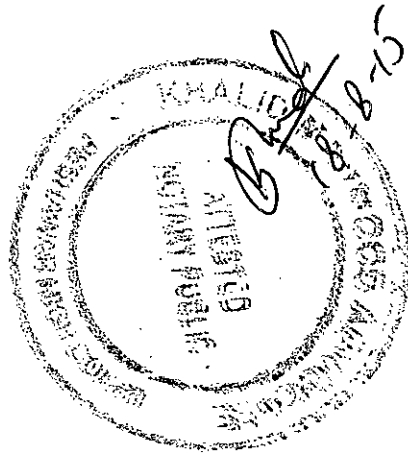
Affidavit

I Mr. Sher Ali Khan Subject Specialist Economics BS-18 Government Higher Secondary Khal District Dir (Lower) do hereby affirm and declare on oath that contents of this Appeal are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Honorable Tribunal.

Identified by -
Mazhar



Deponent



(6)

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No _____/2015

Mr. Sher Ali Khan **versus** Govt: of KP through Secretary (E&SE) & others

ADDRESSES OF THE PARTIES

Appellant:-

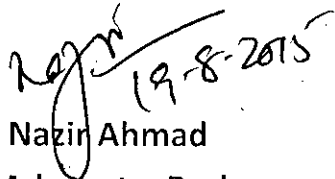
Mr. Sher Ali Khan Subject Specialist Economics BS-18 Government Higher Secondary Khal District Dir (Lower).

Respondents:-

1. Government of KP through Secretary Elementary and Secondary Education Department, (E&SE), Khyber Pakhtoonkhwa Peshawar.
2. Director .Elementary and Secondary Education (E&SE) Khyber Pakhtoonkhwa, Peshawar.
3. Mr. Sher Zada Subject Specialist in Economics BS-17 Government Higher Secondary School Ouch Dir (Lower).


Appellant

Through


Nazir Ahmad
Advocate, Peshawar

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

7

Service Appeal No _____/2015

Mr. Sher Ali Khan versus Govt: of KP through Secretary (E&SE) & others

Application for interim Relief with the prayer that no other person shall be appointed/transferred/posted against the post of Subject Specialist in Economics BS-18 Government Higher Secondary School Ouch Dir (Lower).

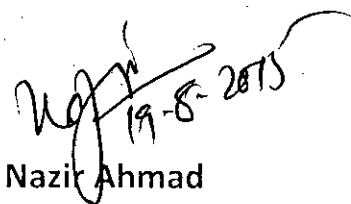
Respectfully Sheweth:-

1. That the memo of Appeal shall be considered part and parcel of this Application.
2. That the Appellant has a prima facie case.
3. That the balance of inconvenience will lie in favour of the Appellant if interim relief not granted.
4. That the Appellant will sustain irreparable loss if interim relief refused to him.

Therefore it is requested that the interim relief may be granted as prayed above.


Appellant

Through


Nazir Ahmad
Advocate, Peshawar.

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

28

Service Appeal No _____/2015

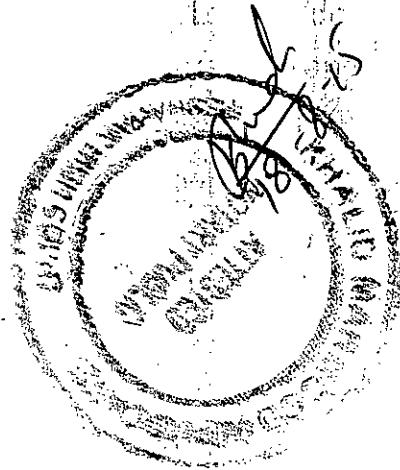
Mr. Sher Ali Khan **versus** Govt: of KP through Secretary (E&SE) & others

Affidavit

I Mr. Sher Ali Khan Subject Specialist Economics BS-18 Government Higher Secondary Khal District Dir (Lower) do hereby affirm and declare on oath that contents of this Application are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Honorable Tribunal.

Identified by
[Signature]

[Signature]
Deponent





Approved

9
Amelur
A

**GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT**

Dated Peshawar the April 16, 2015

NOTIFICATION

NO.SO(S/M) E&SED/1-3/2014/Promotion BS-17 to BS-18/4-tier 2nd Phase : The Competent Authority on the recommendations of the Provincial Selection Board is pleased to promote/appoint the following (520) Officers of Teaching Cadre of Elementary & Secondary Education Department from BS-17 to BS-18 on regular basis with immediate effect as under except Sr. No. 17.

Sr.#	Name	Sr.#	Name	Sr.#	Name
1	Mr. Gul Yar Khan	2	Mr. Fateh Gul	3	Mr. Nusratullah
4	Mr. Ghulam Baqi Jan	5	Mr. Amal Shah	6	Mr. Aurang Zeb
7	Mr. Inayatullah	8	Mr. Kifayat Ullah Jan	9	Mr. Ghulam Rabbani
10	Mr. Muhammad Yaqoob	11	Mr. Muqarrab Khan	12	Mr. Abdur Rashid
13	Mr. Mir Haider	14	Mr. Ismail	15	Mr. Abdur Rehman
16	Mr. Nizakat-ur-Rehman	17	Mr. Iqbal Munir	18	Mr. Muhammad Siraj
19	Mr. Nacem Jan	20	Mr. Muhammad Pervez	21	Mr. Abdullah Shah
22	Mr. Hakam Khan	23	Mr. Gul Ambar Khan	24	Muhammad Idrees Khan
25	Mr. Abdul Malik	26	Mr. Mustafa Khan	27	Mr. Abbas Gul
28	Muhammad Zareen Khan	29	Muhammad Khurshid	30	Mr. Mehboob Ilahi
31	Mr. Fazal Rehman	32	Mr. Sherzada	33	Mr. Suhrab Khan
34	Mr. Akhtar Hussain	35	Mr. Abdul Qayum	36	Mr. Inayat ullah
37	Mr. Muhammad Sadiq	38	Mr. Hidayatullah Kahn	39	Mr. Fida Muhammad
40	Mr. Ghazi Marjan	41	Muhammad Sher Ali Khan	42	Mr. Fazal Muhammad
43	Mr. Riaz Hussain	44	Mr. Farzand Ali	45	Mr. Sharif ullah Khan
46	Mr. Abdul Latif	47	Mr. Zahid Hussain	48	Mr. Ihsan-ul-Haq
49	Mr. Muhammad Jamshaid	50	Mr. Hidayat-ur-Rehman	51	Mr. Gul Aslam
52	Mr. Irshad Ahmad	53	Mr. Almas Khan	54	Mr. Muhammad Ali
55	Mr. Abdullah Khan	56	Mr. Muhammad Shafiq	57	Mr. Khalid Ahmad
58	Mr. Ifikhar Ahmad	59	Mr. Saeed Ahmad	60	Mr. Muhammad Mubashir
61	Mr. Shah-e-Room	62	Mr. Zulfiqar Ali	63	Mr. Zafar Javed Qureshi

*Attended
Nojn*

S#	Name of Officers and Designation	To be proposed	Remarks
78	Khalil-ur-Rehman SS Eco: B-17 GHSS Slema Sikandar Khel Bannu	SS B-18 GCHS Bannu.	Against Vacant Post
79	Tayyib Shahzad SS Pak Study B-17 GHSS Barcela Haripur	SS Pak Study B-18 GCMHSS No.1 Haripur	Against Vacant Post
80	Sher Ali Khan SS Eco: B-17 GHSS Chakdara Dir (Lower)	SS Eco BS-18 GHSS Khal Dir Lower	Agains Vacant Post
81	Sher Habib SS English B-17 GHSS Sadda Dir(Lower)	SS Eng B-18 GHSS Samar Bagh Dir(Lower)	Against Vacant Post
82	Gul Islam SS Maths B-17 GHSS Warana Karak	SS Maths B-18 GHSS Jandrai Karak	Against Vacant Post
83	Daud-ur-Rehman SS English B-17 GHSS Dhakki Charsadda	SS Eng: B-18 GHSS Dosehra Charsadda	Vice Sr.No.537
84	Mian Zia-ud-Din SS Maths B-17 GHSS Manki Sharif Nowshera	Prl: B-18 GHS Spin Khak Nowshera	Against Vacant Post
85	Israj Ali SS Pak Studies B-17 GHSS Tranab Charsadda	SS Pak Studies B-18 GHSS Tarnab Charsadda	Already Occupied
86	Sajjad Aziz SS Eco: B-17 GHSS Bareela Haripur	Instructor B-18 RITE(M) Haripur	Against Vacant Post
87	Muhammad Shafqat SS (Eco) GHSS B-17 Ghari Habibullah Mansehra	Prl: B-18 GHS Talhatta Manshera	Against Vacant Post
88	Mahboob Khan SS Eco: B-17 GHSS Nadir Bodin Khel FR Bannu	Promoted to BS-18	Place at the disposal of Director of Education FATA
89	Jehanzeb SS Pak Studies B-17 GHSS Bagra Haripur	VP B-18 GHS No.2 Haripur	Vice Sr.No.538
90	Jan Sahib Ali SS Eco: GHSS B-17 Bilitang Kohat	SS Eco B-18 GHSS No.1 Kohat	Against Vacant Post
91	Wali Ullah SS Pak Studies B-17 GHSS Warana Karak	SS PS B-18 GHSS Warana Karak	Already Occupied
92	Sair Ullah Shah SS Eco: B-17 GHSS Banghi Khan Khujori Bannu.	Prl B-18 GHS Jandu Khel Bannu	Against Vacant Post
93	Mehrab Gul SS Eco: B-17 GHSS Shah Salim Karak	SS Eco B-18 GHSS Jandrai Karak	Vice Sr.No.539
94	Raza Muhammad SS,Econ:B-17 GHSS.Ismaila Swabi	SS,Econ:B-18 GHSS.Ismaila Swabi	Already Occupied
95	Muhammad Israr, SS Econ B-17 GHSS Umerzai Charsadda	SS Eco B-18 GHSS Utmanzai Charsadda	Against Vacant Post
96	Muhammad Younas, SS PS B-17 GHSS Khanipur Ayubia A/Abad	SS PS B-18 GHSS Khanipur Ayubia A/Abad	Already Occupied
97	Hayat Muhammad SS Pak Studies B-17 GHSS Dhakki Charsadda	V/Prl: B-18 GHSS Dhakki Charsadda	Vice Sr.No.540
98	Ihsan Ullah SS Pak Studies GHSS B-17 Takkar Mardan	SS Pak Studies GHSS B-18 Takkar Mardan	Already Occupied
99	Khizar Hayat SS Bio B-17 GHSS Manki Sharif Nowshera	VP B-18 GHSS Jallozai Nowshera	Against Vacant Post
100	Gulfam Iqbal SS Pak Studies B-17 GHSS Togh Bala Kohat	SS Pak Studies B-18 GHSS Togh Bala Kohat	Already Occupied
101	Niamat Ullah SS Bio B-17 GHSS Sufaid Sang Pehsawar	SS Bio B-18 GHSS Chamkani Peshawar	Vice Sr.No.541
102	Habib-ur-Rehman SS Blo B-17 GHSS Ismail Khel Bannu	SS Bio B-18 GHSS Ismail Khel Bannu	Already Occupied
103	Zard Ali Khan SS Pak Studies B-17 GHSS No 4 Kakshal Pesh:	Principal B-18 GHS Aza Khel Mattani	Against Vacant Post

*Attested
Najam*

S#	Name of Officers and Designation	To be proposed	Remarks
698	Abdur Rauf SS Chem B-17 GHSS Kath Garh DIK	SS Chem B-17 GHSS No.1 Paharpur DIK	Against Vacant Post
699	Muhammad Ashraf HM B-17 Working on B-18 VP at GHSS Lasan Thakral Manshera	HM B-17 GHS M.M.Pol Manshera	Against Vacant Post
700	Wali Dad Khan SS Stat B-17 GHSS Dakki Charsadda	SS Stat B-17 GHSS Musazai Peshawar	Vice Sr.No.371
701	Alam Said SS Phy B-17 GHSS Nissata Charsadda	SS Phy B-17 GHSS Chamtar Mardan	Against Vacant Post
702	Fazli Rabbi, V/P BS-18 GHSS Tahkal Peshawar	Principal BS-18 GHSS Ormar Peshawar.	Against Vacant Post
703	Sardar Ali, SS Chemistry BS-17 working on BS-18 GHSS Barikot Swat	SS Chemistry BS-17 GHSS Balogram Swat	Vice Sr. No. 424
704	Sajad Ali, SS Bio BS-17 working on BS-18 GHSS Barikot Swat	SS Bio BS-17 GHSS Balogram Swat	Vice Sr. No. 111
705	Saadullah Jan, HM BS-17 GHS Tajori Lakki Marwat	HM BS-17 GHS Top Takhti Khel Lakki Marwat	Vice Sr. No.553

4. No TA/DA will be allowed to the oppointees for joining their duty.

CHIEF SECRETARY

Endst: of even No. & Date

Copy forwarded to:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Additional Accountant General Pakistan Revenue Sub Office, Peshawar.
3. PS to Governor Khyber Pakhtunkhwa, Peshawar.
4. PSO to Chief Minister Khyber Pakhtunkhwa, Peshawar.
5. Director, E&SE Khyber Pakhtunkhwa, Peshawar in response to his Letter/Proposal No. .
6. Director, Curriculum & Teacher Education, Abbottabad.
7. Director, Provincial Institute of Teacher Education, Peshawar.
8. Director, Education FATA, FATA Secretariat Warsak Road, Peshawar.
9. Manager Printing Press Khyber Pakhtunkhwa, Peshawar.
10. District Accounts Officers concerned.
11. District Education Officers concerned.
12. PS to Chief Secretary Khyber Pakhtunkhwa, Peshawar.
13. PS to Additional Chief Secretary FATA, FATA Secretariat Warsak Road, Peshawar.
14. PS to Minister E&SE Khyber Pakhtunkhwa, Peshawar.
15. PS to Secretary E&SE Department, Khyber Pakhtunkhwa.
16. PS to Special Secretary E&SE Department, Khyber Pakhtunkhwa.
17. PA to Additional Secretary E&SED, Khyber Pakhtunkhwa.
18. Incharge EMISE E&SE Department.
19. Officers Concerned may download the Notification from our official website: www.kpese.gov.pk
20. Office order file.

Mujeeb-ur-Rehman
16/04/15
(MUJEEB-UR-REHMAN)
SECTION OFFICER (SCHOOLS/MALE)

(12)

To,

The Secretary,
(E&SE) Peshawar,
Khyber Pakhtun Khwa.

Amended
B

Subject: Corrigendum/ Adjustment.

Respected Sir,

It is humbly requested that I have been promoted as SS in Economics from BPS-17 to BPS-18 order No. So (S/M) E&SED/1-3/2014/Promotion-BS-17 to BS-18/4-tier 2nd Phase under S.No 80 from GHSS Chakdara Dir (L) to GHSS Khal Dir (L) which is 70 KM far away from the home station.

Mr. Sher Zada SS in Economics BPS-17 is currently working at GHSS Ouch Dir (L) while the said post is BPS-18 which 10 KM away from my home station.

In this regard, it is requested that I may be kindly adjusted at GHSS Ouch Dir (L) while Mr. Sher Zada SS may be adjusted at GHSS Chakdara Dir (L).

19-4-2015
Yours obediently,
Sher Ali Khan SS in Economics
GHSS Chakdara Dir (L)

Attended
Anwar

Annexure (13)
C

OFFICE OF THE DISTRICT EDUCATION OFFICER(MALE)DISTT:DIR LOWER AT TIMERGARA.

No. 5247 /

Dated Timergara,

the 14 /05/2015

To

The Director
Elementary & Secy:Education
Khyber Pakhtunkhwa Peshawar.

Subject:- APPLICATION FOR CORRIGENDUM/ADJUSTMENT

Memo:-

A self explanatory application in respect of Mr.Sher Ali Khan SS Economics GHSS.Chakdara Distt:Dir Lower is ~~is~~ enclosed,for corrigendum in posting at GHSS.Ouch Dir (L) against SS Economics BS-18 instead of GHSS.Khal Dir (Lower) in Notification No.SO(S/M) E&SED/1-3/2014/Promotion BS-17 to BS-18/4-tier 2nd Phase Dated 16/4/2015, for favourable consideration please.

Encl: i).Application
ii).Vacancy Certificate

[Signature]
DISTRICT EDUCATION OFFICER(MALE)
DISTT:DIR LOWER AT TIMERGARA

Pairy NO. 1173

Dated. 26-5-2015

Directorate Peshawar.

[Signature]
Attested
[Signature]

To,

The Secretary,
(E&SE) Peshawar,
Khyber Pakhtun Khwa.

(14)

Subject: Corrigendum/ Adjustment.

Respected Sir,

It is humbly requested that I have been promoted as SS in Economics from BPS-17 to BPS-18 order No. So (S/M) E&SED/1-3/2014/Promotion BS-17 to BS-18/4-tier 2nd Phase under S.No 80 from GHSS Chakdara Dir (L) to GHSS Khal Dir (L) which is 70 KM far away from the home station.

Mr. Sher Zada SS in Economics BPS-17 is currently working at GHSS Ouch Dir (L) while the said post is BPS-18 which 10 KM away from my home station.

In this regard, it is requested that I may be kindly adjusted at GHSS Ouch Dir (L) while Mr. Sher Zada SS may be adjusted at GHSS Chakdara Dir (L).

~~19-4-2015~~
19-4-2015
Yours obediently,
Sher Ali Khan SS in Economics
GHSS Chakdara Dir (L)

No-2200 - Dated 21-04-15
Forwarded in original to
the District Education Officer for further favourable
consideration pl.

M. Amin
21/4/2015

GHSS Chakdara
Dir (L)

Attended
Agree



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Dated Peshawar the April 23, 2015.

CORRIGENDUM

NO.SO(S/M) E&SED/1-3/2014/Promotion from BS-17 to BS-18/4-tier 2nd Phase: In partial modification of this Department Notification of even number dated 16-04-2015, the following officers are hereby posted and adjusted as mentioned against each:-

Sr.#	Name & Designation	Proposed	Remarks
1/589	Manzoor Ahmad SS Stat B-17 working on B-18 at GHSS No.1 Mardan	May be read as SS (Stat) BS-17 GHSS Shahbaz Ghari Mardan instead of GHSS Pir Saddi Mardan	Against vacant post.
2/465	Muhammad Shafiq Farooqi s/o Muhammad Iqbal SS (History Cum Civics) B-17 GHSS Kabgani Swabi	May be read as prl: BS-18 GHS Utla Swabi instead of SS (History Cum Civics) B-18 GHSS Kabgani Swabi	Against vacant post
3	Hidayatullah SS Statistics BS-17 working on BS-18 GHSS Nurar Bannu	SS Statistics BS-17 GHSS Amandi Umer Khan Bannu	Against vacant post
4/221	Johar Ali SS Stat B-17 GHSS Gul Bahar Peshawar	May be read as SS Statistics BS-18 GHSS No.1, Peshawar Cantt: instead of SS Statistics BS-18 GCMHSS No.1 Haripur.	Against vacant post. The order will be effective from 15-06-2015
5/403	Minhaj ud Din s/o Saadullah Khan SS (Pak.Study) B-17 GHSS Shah Saleem Karak	May be retained as Prl: B-18 GHS Kando Khel Karak	Against vacant post
6/137	Ahmad Saeed SS (Pak Study) working on H/C post B-17 GHSS Warana Karak	May be read as SS Pak Study BS-18 GHSS Jandri Karak instead of Prl: B-18 GHS Kando Khel Karak	Against vacant post
7	Muhammad Zubair SS Pak Study BS-17 working on BS-18 GHSS Jandri Karak	SS Pak Study BS-17. GHSS Nari Panoos karak	Against Vacant Post
8/190	Hamid Ullah SS Stat B-17 GHSS Slema Sikandar Khel Bannu	May be read as Principal BS-18 GHS Boza Khel Bannu instead of SS Stat B-18 GHSS Hakim Haved Bannu	Orders will be effective upon the retirement of the incumbent on 01-05-2015

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Sr.#	Name & Designation	Proposed	Remarks
9/675	Muhammad Salim SS Eng: BS-17 GHSS Mankial Swat	His order at Sr.No.139 is retained as he is promoted to BS-18.	His order at Sr.No.675 is withdrawn.
10/686	Rehmat Ali SS Eng: BS-17 GHSS Fatchpur Swat	May be read as SS Eng: BS-17 GHSS Madyan Swat.	Against vacant post.
11/573	Ahmad Khan SS Isl: BS-17 working on BS-18 GHSS Doaba Hangu	SS Isl: BS-17 GHSS Dallan Hangu.	May be read as Ahmad Khan instead of Jamil-ur-Rehman.
12/662	Shahid Hayat SS Eco: BS-17 working on BS-18 GHSS Tarnab Charsadda.	SS Eco: BS-17 GHSS Umerzai Charsadda.	Against vacant post.
13	Muhammad Javed Iqbal SS Statistics BS-17 GHSS No.2 D.I.Khan	SS State: BS-17 GHSS Shor Kot D.I.Khan	Against vacant post
14/571	Uzair Salmani SS Eco: BS-17 working on BS-18 GHSS Ramak D.I.Khan.	May be read as SS Eco: BS-17 GHS Shoor Kot, instead of Kot Jai, D.I.Khan.	May be read Uzair Salmani instead of Aziz Salmani. (Against Vacant Post)
15/628	Fazal Munir SS Eng B-17 working on B-18 at GHSS Ismaila Swabi	May be read as SS-Eng B-17 GHSS Shahbaz Ghari Mardan instead of Mansabdar Swabi	Against vacant post
16/291	Gul Nawaz Prl. BS-18 GHS Ratta Kulachi D.I.Khan.	Prl. BS-18 GHS Giloti D.I.Khan.	Against vacant post
17	Javed Sarwar SS History-cum-Civics BS-17 working on BS-18 GHSS No.3 Peshawar City	SS History-cum-Civics BS-17 GHSS Sheikhan Peshawar	Against vacant post.
18/610	Allah Nawaz SS Chemistry BS-17 GHSS Nari Panoos Karak	May be read as SS Physics BS-17 GHSS Dabli Lawaghar Karak.	Against vacant post.
19/583	Aurangzeb SS Phy: BS-17 GHSS Gumbat Kohat.	May be read as SS Chemistry BS-17 GHSS Dabli Lawaghar Karak	Against vacant post.
20/559	Abdur Rehman HM BS-17 GHS Dardyal Swat	May be read as HM BS-17 at GHS Khazana Swat	Against vacant post
21/2	Shaukat Ali SS Urdu BS-17 GHSS No.3 Peshawar City	May be read as BS-18 Urdu at GHSS No.4, Peshawar City.	Against vacant post
22/694	Zar Badshah HM B-17 working on B-18 GHSS Kandu Khel Karak	HM B-17 GHS Tor Dhand Karak	The orders will be effective upon the retirement of Shaizullah HM BS-17 at Sr.No.658 on 01-06-2015.
23/106	Muhammad Anwar SS Eco: B-17 GHSS Chaghar Matti Peshawar	May be read as Senior Instructor BS-18 PITE Peshawar instead of SS Eco B-18 GHSS Gujar Ghari Mardan	Against vacant post

Attested
Agm

Signature
Date

Sr.#	Name & Designation	Proposed	Remarks
24/366	Anwar Ullah s/o Habibullah SS (Islamiat) B-17 GHSS Baghicha Dheri Mardan	May be read as SS Islamiat BS-18 GHSS Baghdada Mardan instead of SS Physics BS-18 GHSS Dheri Likpani Mardan	Vice Sr. No. 46
25/606	Amanullah HM BS-17 GHS Shah Baig Mardan	May be read as HM BS-17 GHS Spelano Dheri Mardan.	Vice Sr. No.26
26/570	Tariq Jamal HM BS-17 GHS Spelano Dheri Mardan	May be read as HM BS-17 GHS Shah Baig Mardan	Vice Sr. No.25
27	Talibullah, HM BS-17 working on BS-18 GHS Chappargram Battagram	HM BS-17 GHS Shamlai Battagram	Against vacant post
28/486	Bakhtiar Muhammad s/o Abdul Wahab SS (Pak.Study) B-17 GHSS Kuza Banda Battagram	May be read as Prl: B-18 GHS Chatar Plain Mansehra instead of Battagram	Against vacant post
29/461	Abdur Rauf SS (Pak.Study) B-17 GHSS Korai D.I.Khan	May be read as SS Pak Study BS- 18 GHSS No. 2, instead of No.4, D.I.Khan	Against vacant post
30/81	Sher Habib SS English B- 17 GHSS Saddo Dir(Lower)	May be read as Prl: BS-18 GHS Bagh Dushkhel Dir Lower instead of SS Eng B-18 GHSS Samar Bagh Dir(Lower)	Vice Sr. No. 64
31/	Rehman Ali HIM BS-17 working on BS-18 GHS Naranji Swabi	HIM BS-17 GHS Sikandari Swabi	Against Vacant post.
32/230	Abdur Rashid SS Bio B-18 GHSS Towda China Dir (Lower)	SS Bio BS-18 GHS Khall Dir Lower	Vice Sr. No. 33
33	Ajmal Khan, SS Bio BS-17 working on BS-18, GHSS Khall Dir Lower	SS Bio B-17 GHSS Sufaid Sang Pehsawar.	Against vacant post
34/210	Atiqur Rehman SS, Isl B-17 GHSS Parhinna Mansehra	May be read as Prl; BS-18 GHS Talhatta Mansehra instead of SS Isl B-18 GHSS Lissan Thakral Manshera	Against vacant post
35/61	Shah-i-rome, SS Eco B-18 GHSS Dheri Lakpani Mardan	SS Eco BS-18 GHSS No.4 Mardan	Against vacant post
36/560	Hamid Ullah SS (English) B-17 GHSS Kabgani Swabi	May be read as SS Eng BS-17 GHSS Salim Khan, instead of Mancri Payan, Swabi	Against vacant post
37/640	Tanveer Ahmad SS Isl B-17 GHSS Jatti Pind Haripur	May be read as SS (Islamiat) B-17 GHSS Siri Kot Haripur	Against vacant post
38/483	Munawar Shah s/o Jalal Shah SS (Pak Study) B-17 GHSS Darband Mansehra	May be read as SS Pak Study BS- 18 GHSS Ghari Habibullah Mansehra instead of SS PS B-18 GHSS Behali Mansshera	Against vacant post
39/143	Gul Nawab Khan, SS Eco B-18 GHSS Lissan Takhar Mansehra	Prl; BS-18 GHS Behram Khel Lakki Marwat	Against vacant post

Atiqur Rehman
28/10/15

28/10/15

Sr.#	Name & Designation	Proposed	Remarks
40/265	Sajad Hussain, SS,H/C,B-17 GHSS Chamtar Mardan	May be read as SS H/C BS-18 GHSS Gujar Ghari Mardan instead of SS(H/C) B-18 GHSS Dher Likpani Mardan	Vice Sr. No. 83
41/160	Mir Aslam, Prl B-18 GHS Babuzai Katlang Mardan	May be read as Prl; BS-18 Gul Muqam Malakand instead of Prl B-18 GHS Babuzai Katlang Mardan	Against vacant post
42	Wazir Rahman, SS Phy BS-17 working on BS-18 GHSS Munda Dir Lower	SS Phy BS-18 in his own pay & scale GHSS Samarbagh Dir Lower	Against vacant post
43/367	Anwar Baig s/o Mumtaz Hussain SS (Chem) B-17 GHSS Hazar Khwani Peshawar	May be read as Sr. Instructor BS-18 PITE, instead of Instructor B-18 RITE, Peshawar	Against vacant post
44/238	Muhibullah Khan, SS,Isl; B-17 GHSS Nurar Bannu may be read as GHSS Salima Sikandar Khel Bann	SS,Isl; B-18 GHSS Nurar Bannu	Vice Sr. No. 45
45	Aminullah Khan SS,Isl; BS-17 working on B-18 GHSS Nurar Bannu	SS Isl; BS-17 GHSS Salima Sikandar Khel Bann	Vice Sr. No. 44/238
46	Zia-ur Rehman, SS Islamiat BS-17 working on BS-18 GHSS Bughdada Mardan	SS (Islamiat) B-17 GHSS Baghicha Dheri Mardan	Vice Sr. No. 24
47/261	Minhajud Din, SS,Eng B-17 GHSS Manki Sharfi Nowshera	May be read as SS Eng BS-18 GHSS Jaloza Nowshera instead of GHSS Khairabad Nowshera	Vice Sr. No. 48
48	Fazali Alam, SS Eng BS-17 working on BS-18 GHSS Jaloza Nowshera	SS,Eng B-17 GHSS Manki Sharfi Nowshera	Vice Sr. No. 47/261
49/542	Islam Ali SS Chem B-18 Instructor RITE(M) Ghoriwala Bannu	May be read as Prl; Bs-18 GHSS Kheru Khel Pakka Laki Marwat instead of SS Chem B-18 GHSS Hakim Haved Bannu	Vice Sr. No. 50
50	Saifur Rahman, HM BS-17 working BS-18 GHSS Kheru Khel Pakka Lakki Marwat.	HM BS-17 GHS Land Ahmad Khel Lakki Marwat	Against Vacant Post
51/364	Abdul Karim s/o H.Abdul Latif Khan SS (Islamiat) B-17 GCMHSS Nahaqi Peshawar	May be read as instructor BS-18 RITE (M) Peshawar instead of SS Isl B-18 GHSS Sherpao Charsadda	Vice Sr. No. 72
52/439	Hussain Ahmad s/o Maulan Roohullah SS (Stat) B-17 GHSS Umarzai Charsadda	May be read as Prl; BS-18 GHS No.2 Utmanzi Charsadda instead of SS Stat B-18 GHSS Sherpao Charsadda	Vice Sr. No. 53

*Attested
No. 72*

Sr.#	Name & Designation	Proposed	Remarks
53	Fazli Subhan HM BS-17 working on BS-18 GHS No.2 Utmanzi Charsadda	HM BS-17 GHS Khwaja Hawas Charsadda	Against Vacant Post
54/423	Abdullah Khan SS (Chem) B-17 GHSS Wazir Bagh Peshawar	May be read as V/P BS-18 GHSS Manga Dargai Charsadda instead of SS Chem B-18 GHSS No.4 Kakshal Peshawar City	Vice Sr. No. 55
55	Muhammad Riaz HM BS-17 working on BS-18 GHSS Manga Dargai Charsadda	HM BS-17 GHS Torangzai Charsadda	Against Vacant Post
56/536	Khadim Muhammad HM B-17 GHS Laram Dir(Lower)	HM BS-17 GHS Sehsada Dir Lower	Vice Serial No. 57
57	Shamsul Islam, HM BS-17 GHS Sehsada Dir Lower	HM B-17 GHS Laram Dir(Lower)	Vice Serial No. 56/536
58/512	Shah Faisal s/o Saeed ur Rehman SS (History Cum Civics) B-17 GHSS Baghhicha Dheri Mardan	May be read as SS H/C BS-18 GHSS Bughdada Mardan instead of GHSS No.1 Mardan	Vice Sr. No. 59
59	Muhammad Soaib, SS H/S BS-17 working on BS-18 GHSS Bughdada Mardan	SS H/C BS-17 GHSS Chamtar Mardan	Against Vacant Post
60/455	Sikandar Hayat s/o Mir Saadat Khan SS(Physics) B-17 GHSS Chanda Kurram Karak	May be read as SS Phy BS-18 GHSS Jhandari Karak instead of SS Phy B-18 GHSS Lachi Kohat	Against Vacant Post
61/583	Aurangzeb SS Phy B-17 working on B-18 at GHSS Lachi Kohat	May be read as SS Chem BS-17 GHSS Dabli Lowaghar instead of SS Phy B-17 GHSS Gumbat Kohat	His subject is Chemistry
62/66	Alam Zeb Khan SS Pak Studies B-17 GHSS Ziarat Talash Dir (Lower)	May be read as Pri; BS-18 GHSS Sarai Bala Dir Lower instead of SS PS B-18 GHSS Khal Dir(Lower)	Against Vacant Post
63/643	Muhammad Imtiaz Abbasi SS PS B-18 GHSS Serai Salch Haripur	May be read as Pri; BS-18 GHS Moolia Abbottabad instead of Namal Abbottabad	Against Vacant Post
64	Khair Ul. Anam, HM BS-17 working on BS-18 GHS Bagh Dushkhel Dir Lower	HM BS-17 GHS Utla Dir Lower	Against vacant Post
65/618	Khalid Khan SS Stat B-17 working on B-18 at GHSS Tarnab Charsadda	May be read as SS Stat BS-17 GHSS Nisatta Charsadda instead of SS Stat B-17 GHSS Rashakai Nowshera.	Against vacant Post
66/105	Abdur Rashid SS Bio GHSS B-17 Ghurghushto Buner	May be read as SS Bio BS-18 GHSS Bamkhel Swabi instead of SS Bio B-18 GHSS Kabgani Swabi	Against vacant Post

Attended
Agree

Agreed
5/11/2015

Sr.#	Name & Designation	Proposed	Remarks
67/268	Muhammad Quresh, SS,Stat; B-17 GHSS Ghurghushto Bunir	May be read as SS Stat BS-18, instead of VP B-18, GHSS Kabgani Swabi	Against vacant Post
68/558	Shah Jehan SS Eng B-17 working as B-18 at GHSS Tught Bala Kohat	May be read as SS English B-17 GHSS Gumbat Kohat instead of SS English B-17 GHSS Shakardara Kohat	Against vacant Post
69/417	Muazzam Khan s/o Muhammad Aurangzeb Khan SS (Pak.Study) B17 Now Asstt:Con BISE Abbottabad	May be read as SS PS BS-18 GHSS Srai Saleh Hariur instead of VP B-18 GHSS Kahal Haripur	Against vacant Post
70/23	Gul Ambar Khan SS H/C B-17 GHSS Kabal Swat	May be read as SS H/C BS-18 GHSS Shamozi Swat instead of SS H/C B-18.GHSS Kabal Swat	Vice sr. no. 71
71	Zahoor ullah, SS H/C BS- 17 working on BS-18 GHSS Shamozi Swat	SS H/C B-17 GHSS Kabal Swat	Vice sr.no: 70/23
72	Shabir Ahmad, Instructor BS-18 RITE (M) Peshawar	Vice Pri; BS-18 GHSS No.1 Peshawar City	Against Vacant Post
73	Hakeem Khan, Instructor BS-17 working on BS-18 RITE (M) Mardan	SS Mathis BS-17 GHSS Pir Saddi Mardan	Against Vacant Post
74/38	Hidayat Ullah Khan SS Chem: B- 17 GHSS Landiwa Lakki	May be read as Pri; BS-18 GCMHS Muslim Abad Kohat instead of Pri: B-18 GHS Harama Tala Lakki	Against vacant Post
75/80	Ziaul Islam SS Chem B-18 GHSS Jabbori Manshera may be read as BS-17 instead of BS-18	Retained on his own post/station	Orders is withdrawn at Sr. no. 653
76/48	Ihsan-ul-Haq SS Chems B- 17 GHSS Baffa Manshera	May be read as SS Chems B-18 GHSS Baffa Manshera Instead of Pri B-18 GHS Chatter Plan Manshera	Already Occupied by him
77/122	Mehboobur Rehman SS Eco: B-17 GHSS Dhand Saghri Kohat	May be read as SS Eco B-18 GHSS Warana Karak instead of GHSS Ustarzai Kohat	Against Vacant Post
78/177	Saifullah Khan SS English B-17 GHSS Paharpur DIKhan	May be read as SS Eng B-18 GHSS No. 4 instead of SS Eng B-18 GHSS Ramak DIKhan	Against Vacant Post
79/595	Muhammad Zubair SS (Islamiat) B-17 working on B-18 GHSS Chamkani Peshawar	May be read as SS Isl B-17 GHSS Hazarkhwani instead of Urmar Payan Peshawar	Against Vacant Post

*Attested
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Sr.#	Name & Designation	Proposed	Remarks
80/140	Muhammad Tahir, SS (Pak.Study) B-17 GHSS Mayar Mardan	May be read as SS PS BS-18 GHSS Ismailia Swabi instead of GHSS Nagri Buner	Against Vacant Post
81/522	Muhammad Ayaz HM B-17 working as Prl B-18 GHS Bara Banda Nowshera	May be read as HM BS-17 GHS Afrido Killy Nowshera instead of HM B-17 GHS Mian Isa Nowshera	Against Vacant Post
82/513	Hayat Khan s/o Muhammad Miskeen SS (Pak.Study) B-17 GHSS Sherpur Mansehra	May be read as SS PS BS-18 GHSS Ghari Habibullah Mansehra instead of SS PS B-18 GHSS Baffa Manshera	Against vacant Post
84	Murad Khan SS H/C BS-17 working on BS-18 GHSS Gujar Ghari Mardan	SS (History Cum Civics) B-17 GHSS Baghhicha Dheri Mardan	Against vacant Post

2. No TA/DA is allowed.

SECRETARY

Endst: of even No. & Date:

Copy forwarded to:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Additional Accountant General Pakistan Revenue Sub Office, Peshawar.
3. PSO to Chief Minister Khyber Pakhtunkhwa, Peshawar.
4. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
5. Director, Curriculum & Teacher Education, Abbottabad.
6. Director, Provincial Institute of Teacher Education, Peshawar.
7. Director, Education FATA, FATA Secretariat Warsak Road, Peshawar.
8. Manager Printing Press Khyber Pakhtunkhwa, Peshawar.
9. District Accounts Officers concerned.
10. District Education Officers concerned.
11. PS to Chief Secretary Khyber Pakhtunkhwa, Peshawar.
12. PS to Additional Chief Secretary FATA, FATA Secretariat Warsak Road, Peshawar.
13. PS to Minister E&SE Khyber Pakhtunkhwa, Peshawar.
14. PS to Secretary E&SE Department, Khyber Pakhtunkhwa.

*Attaullah
Noor*

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- 15. PS to Special Secretary E&SE Department, Khyber Pakhtunkhwa.
- 16. PA to Additional Secretary E&SED, Khyber Pakhtunkhwa.
- 17. Incharge EMISE E&SE Department.
- 18. Notification can be downloaded from our website: www.kpese.gov.pk
- 19. Office order file.

Mujeeb-ur-Rehman
 5/10/15 -
 (MUJEEB-UR-REHMAN)
 SECTION OFFICER (SCHOOLS/MALE)

*Affected
 Dept*

Mujeeb-ur-Rehman

TO,
THE CHIEF SECRETARY,
GOVERNMENT OF KHYBER PAKHTUNKHWA,
PESHAWAR.

Subject: APPEAL.

Amelure
(B)
(93)

Honorable Sir,

With great respect it is stated that I have been working as subject specialist BS - 17 at Elementary & Secondary Education Department Govt. of Khyber Pakhtunkhwa Peshawar since 2003. Recently I have been promoted from BS - 17 to BS - 18 vide office order No. SO(S)/M-E&SE-D/1-3/2014 promotion BS - 17 to BS - 18 / 4 - tier 2nd Phase Dated Peshawar 16 - 04 - 2015. S.No. 80

Sir I want to draw your kind attention to the following points.

1. I am a bonafide resident of Chakdara Tehsil Adenzai Dir Lower.
2. Before promotion I had been working at GHSS Chakdara Dir Lower which is my home station.
3. In the said promotion order I have been adjusted at GHSS Khall District Dir Lower 70 km faraway from my residence as well as from my native village i.e. Chakdara Dir Lower while my proposed center was GHSS Ouch Dir Lower as SS, BS 18, against vacant post.
4. After the promotion order I submitted an application for corrigendum in order regarding adjustment SS - 18 (Economics), GHSS Ouch District Dir Lower on 19 - 04 - 2015, which is convenient for me.
5. Beside that I am the sole supporter of my family with no other male family member.
6. On 23 - 04 - 2015 a corrigendum was made in same order but our application were not considered without any reason.

I, therefore, request in your honor to consider my appeal for placement / adjustment at GHSS Ouch Dir Lower against vacant post of SS, BS - 18 (Economics) at GHSS Ouch Dir Lower. Where it is easy for me to perform my duty diligently. (All the relevant documents attached for reference).

I shall remain highly obliged.

Thanks.

Yours Obediently

(Signature)
7-5-2015
Sher Ali Khan
SS, BS - 18 (S.No. 80)

Copy to.

1. PA to Chief Minister Khyber Pakhtunkhwa
2. Secretary Elementary & Secondary Education Khyber Pakhtunkhwa
3. Director Elementary & Secondary Education Khyber Pakhtunkhwa

Diary No. 4802
Dated. 7-5-2015

Attended -
Mejra

WAKALATNAMA

24

In the K.P.K. Justice Tribunal, Peshawar

Mr Sher Ali Khan S.S. Economics G.H.S.S. 1664 (Dir.) - Appellant
D.S. 18,

VS

Govt of K.P.K. through Secretary (E&S) Education & other

I/yc: Mr Sher Ali Khan, S.S. Economics B.S. 18,
do hereby appoint Mr. Nazir Ahmad Advocate Peshawar High Court Peshawar my/our Counsel in subject proceedings and authorize him to appear, plead, compromise, withdraw or refer the matter for arbitration for me/us without any liability for his default and with the authority to engage/appoint any other advocate/counsel at my/our expense if necessary and receive all sums and amounts payable to me/us and to all such acts which he may deem necessary for protecting my/our interests in the matter. He is authorized to file Appeal, Revision, Review and Application for restoration or Application for setting-aside ex-parte decree proceedings on my/our behalf.

Dated: 19.8.2015

Accepted and Attested

Nazir
19.8.2015

Nazir Ahmad
Advocate, Peshawar
Cell: 0301-8571879
Office: 091-5277215

[Signature]
Appellant

Before the K.A.K. Service Tribunal, Lahore.

Service Appeal No 929/2015

Mr She Ali Khan vs Govt K.A.K. & Co

Application for deletion of Respondent No 3.

Respectfully submitted:-

1- That in the above appeal, the Appellant is mostly aggrieved against the order of the Respondent No 2, whereas the Respondent No 3 was placed as a *supra* Respondent. The main prayer of the Appellant is that he is to be posted at the place near to his home town, hence the Respondent No 3 be deleted as Respondent, However to keep the record straight, the merits of the Appeal is to be considered unchanged.

It is prayed that the Application be accepted & the Respondent No 3 be deleted as Respondent, further *status quo* be maintained.

Applicant
Thyq Nazir
28-11-2015
Nazir Ahmad
Advocate.

Dy 28-11-2015,

لبرالٹ - ضابطہ سرگس ٹریڈنگ کمپنی KDK پیمانہ

ASI کی اجازت واپس
1GP etc
اپیلرٹ
سیکرٹ

درخواست طیارہ اجازت جاری کرنے
پر آئے جمع کرنے
Process Changes.

ضابطہ

اپیلرٹس کے بارے میں

1) ایک مندرجہ بالا سرگس ایک ریسرچورس عدالت حضور سے

اور آئندہ تاریخ پیشی 10-2/16 حقار سے

2) ایک اپیلرٹ کی صورت 11/12 کو برائے ضابطہ

ٹریڈنگ جاری ہوئے کچھ بہتر جمع کرانے

مضمون میں مندرجہ بالا

3) ایک مندرجہ بالا Process & Security کے

دیکھ و صفحہ عدالت مالک جمع کرانہ بنا کر
Charges

4) ایک عدم جمع کرانہ جاری ریسرچورس سے تیک سون

لبرالٹ سے ہے کہ اپیلرٹس کو موقع فراہم کرنا
جانے کے بارے میں مضمون خطوط
فراہم کرنا

26/11/16

اپیلرٹس برائے لبرالٹ
سیکرٹری لبرالٹ
پیمانہ

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

32
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Service Appeal No: 929 /2015

Sher Ali Khan SS(Economics) GHSS Khal District Dir (Lower)

.....Applicant

VERSUS

Secretary E&SE Department, Khyber Pakhtunkhwa & others.

.....Respondents

**REPLY TO THE APPLICATION FOR THE SUSPENSION OF THE OPERATION OF IMPUNGED
NOTIFICATION DATED 16-4-2015 ON & FOR BEHALF OF RESPONDENTS No: 1-2.**

Respectfully Sheweth :-

The Respondents submit as under:-

PRELIMINARY OBJECTIONS.

- 1 That the Applicant has got no cause of action / locus standai .
- 2 That the instant application is badly time barred.
- 3 That the Applicant has concealed material facts from this Honorable Tribunal in the instant application.
- 4 That the instant application is based on malafide intentions.
- 5 That the Applicant has not come to this Honorable Tribunal with clean hands.
- 6 That the Applicant is entitled for the relief he has sought from this Honorable Tribunal .
- 7 That the instant application is against the prevailing law & rules.
- 8 That the instant application is based on malafide intentions just to put extra pressure on the Respondents for gaining illegal service benefits against SS(Economics) post.
- 9 That the Applicant has been treated as per law rules & policy.
- 10 That the application is not maintainable in its present form..
- 11 That the application is bad for mis joinder & non joinder of the necessary parties.
- 12 That the instant application is barred by law
- 13 That the Applicant is not competent to file the instant application against the respondents.
- 14 That the Notification dated 16-4-2015 is legally competent & is liable to be maintained in favour of the Respondents.

ON FACTS

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- 1 That Para-1 needs no comments. However, the points as raised in the reply to the appeal may also be treated as an integral part & parcel of this reply on behalf of the Respondents .
- 2 That Para-2 is incorrect. The Respondents have got a good prima facie case & its chances of Success are very bright in favour of the Respondent Department.
- 3 That Para-3 is incorrect. The balance of convenience also lies in favour of the Respondents & if the application in hand is not dismissed then the Respondents shall suffer irreparable losses.
- 4 That Para-4 is incorrect & denied. The statement of the applicant is baseless.

In view of the above made submissions, it is requested that this Honorable Tribunal may very graciously be pleased to dismiss the instant service appeal with cost in favor of the Respondent Department.



Secretary
E&SE Department Khyber
Pakhtunkhwa, Peshawar.



Director
E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondents No: 2)

BEFORE THE HONORABLE KHYBER PAKHATUNKHWA SERVICE TRIBUNAL PESHAWAR.

30

Service Appeal No: 929 /2015

Sher Ali Khan SS(Economics) GHS Khal District Dir (Lower)

.....Appellant.

VERSUS

Secretary E&SE Department, Khyber Pakhtunkhwa & others.

.....Respondents

JOINT PARAWISE COMMENTS ON & FOR BEHALF OF RESPONDENTS No: 1-2.

Respectfully Sheweth :-

The Respondents submit as under:-

PRELIMINARY OBJECTIONS.

- 1 That the Appellant has got no cause of action / locus standi .
- 2 That the instant Service Appeal is badly time barred.
- 3 That the Appellant has concealed material facts from this Honorable Tribunal in the instant service appeal.
- 4 That the instant service appeal is based on malafide intentions.
- 5 That the Appellant has not come to this Honorable Tribunal with clean hands.
- 6 That the Appellant is entitled for the relief he has sought from this Honorable Tribunal .
- 7 That the instant Service Appeal is against the prevailing law & rules.
- 8 That the instant appeal is based on malafide intentions just to put extra pressure on the Respondents for gaining illegal service benefits against SS (Economics) post.
- 9 That the Appellant has been treated as per law rules & policy.
- 10 That the appeal is not maintainable in its present form.
- 11 That the appeal is bad for mis-joinder & non-joinder of the necessary parties.
- 12 That the instant Service Appeal is barred by law
- 13 That the Appellant is not competent to file the instant appeal against the respondents.
- 14 That the Notification dated 16-4-2015 is legally competent & is liable to be maintained in favour of the Respondents.

ON FACTS

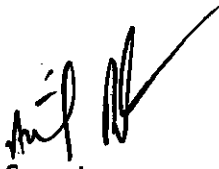
- 1 That Para-1 is correct to the extent that the appellant has been promoted from BPS-17 to 18 vide Notification No: SO(S/M) E&SED/1-3/2014/Promotion /B-17 to 18 /14& 2nd phase dated 16-4-2015 against the SS(Economics) BPS-18(M) at GHSS Khal Dir (Lower) KPK by the Respondent No: 1 under the mandatory provisions of Section-10 of Civil Servant Act 1973 on the analogy of being a Provincial Teaching Cadre post. Hence the plea of the appellant regarding his posting & adjustment against the said post at GHSS Ouch District Dir (Lower) is illegal and without any justification showing that the appellant is seeking his adjustment against the said post at the station of his choice. Hence is liable to be rejected. (Copy of the Notification is attached as Annexure-A).
- 2 That Para-2 is incorrect & denied. The Respondents are entitled to transfer and post a civil servant who is falling under the ambit of Section-2(b) of Civil Servants Act 1973, wherever his services are required. Therefore, the claim of the appellant regarding his posting & adjustment against the SS (Economics)(M) BPS-18 at GHSS Ouch Dir (Lower) is without any force/merit & legal justification.
- 3 That Para-3 is incorrect & denied. The appellant has been treated as per law & rules in the instant case by the Respondents vide Notification dated 16-4-2015 under the provision of the above referred provisions of law.
- 4 That Para-4 is also incorrect & denied on the grounds as taken in the foregoing paras of the instant reply. Hence need no further comments.
- 5 That Para-5 is incorrect & denied. No departmental appeal has been filed by the appellant against the impugned Notification dated 16-4-2015 nor any such record is available in the office of the replying Respondent.
- 6 That Para-6 is legal. However, the Respondents further submit on the following grounds inter alia :-

GROUND

- A Incorrect & denied. The appellant has been treated as per law & rules vide Notification dated 16-4-2015 by the Respondent No: 1. Therefore, the claim of the appellant regarding his adjustment in his Home Town is illegal & without any force. Hence is liable to be rejected.
- B Incorrect & denied. The referred ruling is not applicable upon the case of the appellant of being a Provincial Teaching Cadre post. Hence the Notification dated 16-4-2015 is not only legally competent but is also liable to be maintained.
- C Needs no comments being pertains to the domestic issues of the appellant, having no concern with the instant case nor the appellant has submitted any application under the spouse policy for the adjustment of both Husband & Wife in the said District, hence the act of the Respondents with regard to the Notification dated 16-4-2015 is within legal and constitutional parameter.
- D Incorrect & denied. The stand of the appellant regarding the adjustments of the similarly placed officials vide Notification dated 23-4-2015 is meritless & liable to struck down in the interest of public service.
- E Incorrect & denied. As explained in the foregoing paras.

- F Incorrect & denied. The Respondents have acted as per law, rules & policy with regard to the Notification dated 16-4-2015, hence the said Notification is liable to be maintained in favour of the Respondents with the additional submissions that the Respondents Seek leave of this Honorable Tribunal to advance / submit record & case law at the time of arguments on main appeal.

In view of the above made submissions, it is requested that this Honorable Tribunal may very graciously be pleased to dismiss the instant service appeal with cost in favour of the Respondent Department.



Secretary

E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondent No: 1)



Director
E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondents No: 2)



(Ameluse) (A) (9)

**GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT**

Dated Peshawar the April 16, 2015

NOTIFICATION

NO.SO(S/M) E&SED/1-3/2014/Promotion BS-17 to BS-18/4-tier 2nd Phase : The Competent Authority on the recommendations of the Provincial Selection Board is pleased to promote/appoint the following (520) Officers of Teaching Cadre of Elementary & Secondary Education Department from BS-17 to BS-18 on regular basis with immediate effect as under except Sr. No. 17.

Sr.#	Name	Sr.#	Name	Sr.#	Name
1	Mr. Gul Yar Khan	2	Mr. Fatch Gul	3	Mr. Nusratullah
4	Mr. Ghulam Baqi Jan	5	Mr. Amal Shah	6	Mr. Aurang Zeb
7	Mr. Inayatullah	8	Mr. Kifayat Ullah Jan	9	Mr. Ghulam Rabbani
10	Mr. Muhammad Yaqoob	11	Mr. Muqarrab Khan	12	Mr. Abdur Rashid
13	Mr. Mir Flaider	14	Mr. Ismail	15	Mr. Abdur Rehman
16	Mr. Nizakat-ur-Rehman	17	Mr. Iqbal Munir	18	Mr. Muhammad Siraj
19	Mr. Nacem Jan	20	Mr. Muhammad Pervez	21	Mr. Abdullah Shah
22	Mr. Hakam Khan	23	Mr. Gul Ambar Khan	24	Muhammad Idrees Khan
25	Mr. Abdul Malik	26	Mr. Mustafa Khan	27	Mr. Abbas Gul
28	Muhammad Zareen Khan	29	Muhammad Khurshid	30	Mr. Mehboob Ilahi
31	Mr. Fazal Rehman	32	Mr. Sherzada	33	Mr. Suhrab Khan
34	Mr. Akhtar Hussain	35	Mr. Abdul Qayum	36	Mr. Inayat ullah
37	Mr. Muhammad Sadiq	38	Mr. Hidayatullah Kahn	39	Mr. Fida Muhammad
40	Mr. Ghazi Marjan	41	Muhammad Sher Ali Khan	42	Mr. Fazal Muhammad
43	Mr. Riaz Hussain	44	Mr. Farzand Ali	45	Mr. Sharif ullah Khan
46	Mr. Abdul Latif	47	Mr. Zahid Hussain	48	Mr. Ihsan-ul-Haq
49	Mr. Muhammad Jamshaid	50	Mr. Hidayat-ur-Rehman	51	Mr. Gul Aslam
52	Mr. Irshad Ahmad	53	Mr. Almas Khan	54	Mr. Muhammad Ali
55	Mr. Abdullah Khan	56	Mr. Muhammad Shafiq	57	Mr. Khalid Ahmad
58	Mr. Iftikhar Ahmad	59	Mr. Saeed Ahmad	60	Mr. Muhammad Mubashir
61	Mr. Shah-e-Room	62	Mr. Zulfiqar Ali	63	Mr. Zafar Javed Qureshi

*Attended
No. 17*

16
10

S#	Name of Officers and Designation	To be proposed	Remarks
498	Zain Ullah s/o Mian Shahzada HM B-17 GHS Degan Taji Killa Bannu	Pri: B-18 GHS Degan Taji Killa Bannu	Already Occupied
499	Muhammad Javed s/o M.Nawab Khan B-17 HM GHS Aboha Swat	Pri: B-18 GHS Aboha Swat	Already Occupied
500	Muhammad Iqbal Khan s/o Abdul Sattar SS (Pak.Study) B-17 GHSS Pairan Mansehra	SS PS B-18 GHSS Bagnetar Abbottabad	Vice Sr.No.634
501	Sher Muhammad s/o Jan Gul SS (Islamiat) B-17 GHSS No.1 Kohat	SS (Islamiat) B-18 GHSS No.1 Kohat	Already Occupied
502	Ifikhar s/o M.Yousaf SS(Stat) B-17 GHSS Richbhen Abbottabad	SS Stat B-18 GHSS Nawashera Abbottabad	Vice Sr.No.635
503	Alamzeb s/o Haji Amir Nawaz Khan SS (Pak.Study) B-17 GHSS Ghallani Mohmand Agency	Promoted to BS-18	Place at the disposal of Director of Education FATA
504	Muhammad Zahir s/o Aziz ur Rehman SS (Pak.Study) B-17 GHSS Hazar Khwani Peshawar	SS(PS) B-18 GHSS No.4 Kakshal Peshawar	Vice Sr.No.103
505	Inam Ullah s/o Abdul Hameed SS (Economics) B-17 GHSS Gul Bahar Peshawar	SS Eco B-18 GHSS Sherpao Charsadda	Vice Sr.No.636
506	Muhammad Zakirullah s/o Fazal Muhammad SS (History Cum Civics) B-17 GHSS Qilla Dir (L)	VP B-18 GHSS Qilla Dir(L)	Against Vacant Post
507	Raees Ahmad s/o Saeed Ahmad SS (Stat) B-17 GHSS Chakdara Dir (L)	VP B-18 GHSS Ouch Dir (Lower)	Against Vacant Post
508	Niaz Khan s/o Abbas Khan SS (Urdu) B-17 GHSS Nurar Bannu	SS Urdu B-18 GHSS Domel Bannu	Against Vacant Post
509	Syed Farooq Shah s/o Sardar Khan SS (Maths) B-17 GHSS Ismail Khel Bannu	SS (Maths) B-18 GHSS Ismail Khel Bannu	Already Occupied
510	Akhtar Nawab s/o Bakht Nawab SS (Economics) B-17 GHSS Khwza Khela Swat	VP B-18 GHSS Khwza Khela Swat	Against Vacant Post
511	Syed Raza Shah s/o Syed Hamid Shah SS (Chem) B-17 GHSS Fatima Mardan	SS Chem B-18 GHSS Dosehra Charsadda	Vice Sr.No.637
512	Shah Faisal s/o Saeed ur Rehman SS (History Cum Civics) B-17 GHSS Baghhicha Dheri Mardan	SS(History Cum Civics) B-18 GHSS No.1 Mardan	Against Vacant Post
513	Hayat Khan s/o Muhammad Miskeen SS (Pak.Study) B-17 GHSS Sherpur Mansehra	SS PS B-18 GHSS Baffa Manshera	Against Vacant Post
514	Munir Ahmad s/o Sher Muhammad SS (History Cum Civics) B-17 GHSS Dalan Hangu	SS (H/C) B-18 GHSS Doaba Hangu	Vice Sr.No.638
515	Sami Ullah s/o Zarmat Khan SS (History Cum Civics) B-17 GHSS Eidak NWA	Promoted to BS-18	Place at the disposal of Director of Education FATA
516	Khalil ur Rehman s/o Lair Jan SS (English) B-17 GHSS Kalaya Orakzai Agency	Promoted to BS-18	Place at the disposal of Director of Education FATA
517	Niamat Ali s/o Fazal Ali SS (Biology) B-17 GHSS Dheri Lakpani Mardan	SS Bio B-18 GHSS Dheri Lakpani Mardan	Already Occupied
518	Khalid Iqbal s/o Naseer Khan SS (Biology) B-17 GHSS Lachi Kohat	SS (Biology) B-18 GHSS Lachi Kohat	Already Occupied
519	Muhammad Sawar s/o Muhammad Nisar SS (English) B-17 GHSS Khanpur Dir (L)	Instructor B-18 RITE(M) Timaraghar Dir	Against Vacant Post

Attended
10/11

S.No	Name of Officers and Designation	To be proposed	Remarks
698	Abdur Rauf SS Chem B-17 GHSS Kath Garh DIK	SS Chem B-17 GHSS No. 1 Paharpur DIK	Against Vacant Post
699	Muhammad Ashraf HM B-17 Working on B-18 VP at GHSS Lasan Thalral Manshera	HM B-17 GHS M.M.Pol Manshera	Against Vacant Post
700	Wali Dad Khan SS Stat B-17 GHSS Dakki Charsadda	SS Stat B-17 GHSS Musazai Peshawar	Vice Sr.No.371
701	Alam Said SS Phy B-17 GHSS Nissata Charsadda	SS Phy B-17 GHSS Chamtar Mardan	Against Vacant Post
702	Fazli Rabbi, V/P BS-18 GHSS Tahkal Peshawar	Principal BS-18 GHSS Ormar Peshawar	Against Vacant Post
703	Sardar Ali, SS Chemistry BS-17 working on BS-18 GHSS Barikot Swat	SS Chemistry BS-17 GHSS Balogram Swat	Vice Sr. No. 424
704	Sajad Ali, SS Bio BS-17 working on BS-18 GHSS Barikot Swat	SS Bio BS-17 GHSS Balogram Swat	Vice Sr. No. 111
705	Saadullah Jan, HM BS-17 GHS Tajori Lakki Marwat	HM BS-17 GHS Top Takhti Khel Lakki Marwat	Vice Sr. No.553

(15)

CHIEF SECRETARY

Endst: of even No. & Date

Copy forwarded to:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Additional Accountant General Pakistan Revenue Sub Office, Peshawar.
3. PS to Governor Khyber Pakhtunkhwa, Peshawar.
4. PSO to Chief Minister Khyber Pakhtunkhwa, Peshawar.
5. Director, E&SE Khyber Pakhtunkhwa, Peshawar in response to his Letter/Proposal No. .
6. Director, Curriculum & Teacher Education, Abbottabad.
7. Director, Provincial Institute of Teacher Education, Peshawar.
8. Director, Education FATA, FATA Secretariat Warsak Road, Peshawar.
9. Manager Printing Press Khyber Pakhtunkhwa, Peshawar.
10. District Accounts Officers concerned.
11. District Education Officers concerned.
12. PS to Chief Secretary Khyber Pakhtunkhwa, Peshawar.
13. PS to Additional Chief Secretary FATA, FATA Secretariat Warsak Road, Peshawar.
14. PS to Minister E&SE Khyber Pakhtunkhwa, Peshawar.
15. PS to Secretary E&SE Department, Khyber Pakhtunkhwa.
16. PS to Special Secretary E&SE Department, Khyber Pakhtunkhwa.
17. PA to Additional Secretary E&SED, Khyber Pakhtunkhwa.
18. Incharge EMISE E&SE Department.
19. Officers concerned may download the notification from our official website: www.kpseb.gov.pk
20. Office order file.

Mujeeb-ur-Rehman
Mujeeb-ur-Rehman

(MUJEEB-UR-REHMAN)
 SECTION OFFICER (SCHOOLS/MALE)

15/04/15

IN THE KP SERVICE TRIBUNAL, PESHAWAR.

Re
in

Service Appeal...../2015

Mr. Sher Ali Khan Subject Specialist Economics BS-18 Government Higher
Secondary School Khal District Dir (Lower),

Versus

Government of KP through Secretary Elementary and Secondary Education
Department, (E&SE), KPK Peshawar and another

Rejoinder on behalf of the Appellant

Respectfully Sheweth:- The need for the instant Rejoinder arises due to the following facts:

Facts:-

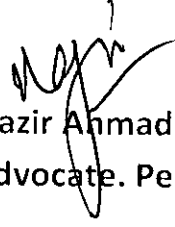
1. That the reply of facts and grounds is evasive and arbitrary with no solid reasons or public interest.
2. That the Respondents have admitted that the post is lying vacant and no one right is to be injured or violated if the Appellant is posted there.
3. That the answer of the Respondents is that we have done every thing in accordance with law but have forgotten that when the order of all others similarly placed is rectified by issuance of corrigendum then what is wrong with the Appellant that his order is not rectified despite the fact that vacant post is available and the Respondent no 1 have prepared a working paper and have sent to the Respondent no 2 on 22.9.2015 through Dairy no 4247. This is a clear discrimination which is forbidden by the Constitution of

Pakistan . The case of the Appellant is against the Couple policy which as per policy are to be placed at one place or nearest to each others.....Copies Attached)

Therefore it is humbly prayed that on acceptance of this Rejoinder the Appeal of the Appellant be accepted and the order may be issued as prayed in the Appeal.

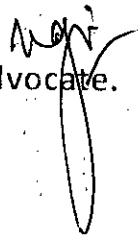
Appellant

Through


Nazir Ahmad
Advocate. Peshawar.

Verification

Verified that the contents of this Rejoinder is correct as per instruction of my client


Advocate.

1

(1)

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

No. SOR-HE&ADM-1/85 (VOL-II)
Dated Peshawar the 15th February 2003.

1. All Administrative Secretaries to Govt. of NWFP.
2. The Secretary to Governor, NWFP.
3. The Secretary to Chief Minister, N.W.F.P.
4. All heads of Attached Departments in NWFP.
5. All heads of Autonomous/Semi-Autonomous Bodies in NWFP.
6. All District Coordination Officers/Political Agents in NWFP.
7. The Registrar Peshawar High Court Peshawar.
8. All District and Session Judges in NWFP.
9. The Secretary, NWFP Public Service Commission, Peshawar.
10. The Director Anti-Corruption Establishment, Peshawar.
11. The Secretary, Board of Revenue, NWFP, Peshawar.
12. The Registrar, NWFP Service Tribunal, Peshawar.

Subject: POSTING/TRANSFER POLICY OF THE PROVINCIAL GOVERNMENT

Dear Sir,

I am directed to refer to the subject noted above and to say that in supersession of policy instructions issued in this behalf, the competent authority has approved the following Posting/Transfer Policy:

(i) All postings/transfers shall be strictly in public interest and shall not be abused to victimize the Government servants.

(ii) All Government servants are prohibited to exert political, Administrative or any other pressures upon the posting/transfer authorities for seeking posting/transfers of their choice and against the public interest.

(iii) All contract Government employees, appointed against specific posts, can not be posted against any other post.

(iv) The normal tenure of posting shall be three years subject to the condition that for the officers/officials posted in unattractive areas, the tenure shall be two years and for the hard areas the tenure shall be one year. The unattractive and hard areas will be notified by the Government.

(v) Months of March and July are fixed for posting/transfer of the officers/officials excluding the officers in B-19 and above in the Province. Posting/transfer in Education and Health Departments shall be made in March while the remaining Departments shall make posting/transfers in July. There shall be a ban on posting/transfers throughout the year excluding the aforesaid two months. However, there shall be no restriction in cases where postings/transfers of Government employees become inevitable in other months due to promotion/retirement/creation of new posts/return from long leaves/involvement in disciplinary proceedings and adjustment of surplus staff, for which specific relaxation shall be obtained from the Chief Minister.

(vi) While making postings/transfers from settled areas to FATA and vice-versa, specific approval of the Governor, NWFP needs to be obtained.

(vii) Officer may be posted on executive/administrative posts in the Districts of their domicile except District Coordination Officers (D.C.Os) and Superintendent of Police (S.P). Similarly, Deputy Superintendent of Police (DSP) shall not be posted at a place where the Police Station (Thana) of his area of residence is situated.

only in
March

- viii) No postings/transfers of the officers/officials on detailment basis shall be made.
- ix) Regarding the posting of husband/wife, both in Provincial services, efforts where possible could be made to post such persons at one station and this will be subject to the public interest.
- x) All the posting/transferring authorities may facilitate the postings/transfers of the unmarried female Government Servants at the station of the residence of their parents.
- xi) Officers/Officials except DCOs and SPs who are due to retire within one year may be posted on their option, on posts in the Districts of their domicile and be allowed to serve their till the retirement.
- xii) In terms of Rule-17(1) and (2) read with Schedule-III of the Government of NWFP Rules of Business 1985, transfer of officers shown in column 1 of the following table shall be made by the authorities shown against each officers in column 2 hereof:

1	2
---	---

Outside the Secretariat

- | | |
|---|--|
| <ol style="list-style-type: none"> 1. Officers of the all Pakistan Unified Group : i. DMG, PSP including Provincial Police Officers in BPS-18 and above. 2. Other officers in BPS-17 and above to be posted against scheduled posts, or posts normally held by the APUG, PCS (EC) and PCS(SG). 3. Head of Attached Departments and other Officers in E-19 & above in all the Deptts. In the Secretariat:- 4. Secretaries. 5. Other Officers of and above the rank of Section Officers:- <ul style="list-style-type: none"> (a) Within the Same Department. (b) Within the Secretariat from one Department to another. 6. Officials upto the rank of Superintendent:- <ul style="list-style-type: none"> (a) Within the same Department. (b) To and from an Attached Department. (c) Within the Secretariat from one Department to another. | <p>Chief Secretary in consultation with the Establishment Department and the Department concerned with the approval of the Chief Minister.</p> <p>- do -</p> <p>- do -</p> <p>Chief Secretary with the approval of the Chief Minister.</p> <p>Secretary of the Department concerned.</p> <p>Chief Secretary/Secretary Establishment.</p> <p>Secretary of the Department concerned.</p> <p>Secretary of the Department in consultation with Head of Attached Department concerned.</p> <p>Secretary (Establishment)</p> |
|---|--|

xiii) While considering postings/transfers proposals all the concerned authorities shall keep in mind the following:-

- a) To ensure the posting of proper persons on proper posts, the annual confidential reports, past and present record of service, performance on post held presently and in the past and general reputation with focus on the integrity of the concerned officers/officials be considered.
- b) Tenure on present post shall also be taken into consideration and the posting/transfers shall be in the best public interest.

XIV

Government servants including District Govt. employees feeling aggrieved due to the orders of posting/transfers authorities may seek remedy from the next higher authority/the appointing authority as the case may be through an appeal to be submitted within seven days of the receipt of such orders. Such appeal shall be disposed of within fifteen days. The option of appeal against posting/transfer orders could be exercised only in the following cases:-

- i) pre-mature posting/transfer or posting/transfer in violation of the provisions of this policy.
- ii) Serious and grave personal (humanitarian) grounds.

To streamline the postings/transfers in the District Government and to remove any irritant/confusions in this regard the provision of Rule 25 of the North-West Frontier Province District Government Rules of Business, 2001 read with schedule -IV thereof is referred. As per schedule-IV the posting/transferring authorities for the officers/officials shown against each are as under :-

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

As per Rule 25(2) of the Rules mentioned above the District Coordination Department shall consult the Government if it is proposed to:

- (i) transfer the holder of a tenure post before the completion of his tenure or extend the period of his tenure; and

b) require an officer to hold charge of more than one post for a period exceeding two months.

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

Yours faithfully,

(GHULAM JILANI ASIF)
ADDL. SECRETARY (REG)

Encls: No. SORJ(E&AD)1-1/85 Dated Peshawar the 15.2.2003.

Copy forwarded to :-

1. All Additional Secretaries in E&A Department.
2. All Deputy Secretaries in E&A Department.
3. All Section Officers in E&A Department.
4. Private Secretary to Chief Secretary, NWFP.
5. Private Secretary to Secretary Establishment.
6. Librarian E&A Department.

(HUSSAIN SIHAL)
DEPUTY SECRETARY (REG-I)

Encls: No. SORJ(E&AD)1-1/85 Dated Peshawar the 15.2.2003.

Copy forwarded to :-

1. The Accountant General, N.W.F.P., Peshawar.
2. All District/Agency Accounts Officers in NWFP.

(GHAZANFAR ALI)
SECTION OFFICER (REG-I)

Mad. Asst. Secy

25-11/11
7/2/03

(4)

Forwarded Summary for Provincial Cabinet
placed in file vide P. 186 to 202/n
Encls. decision is placed
vide P. 205 to 208/n

Rule 22 of the NWFP Government
Servants (Conduct) Rules, 1987.

22. Approach to Members of the Assemblies:- "No Government servant shall, directly or indirectly approach any member of the National Assembly or a Provincial Assembly or any other non-official person to intervene on his behalf in any matter."