

18.08.2015

None present for appellant despite notice and repeated calls. Security and process fee also not deposited. The Court time is over. Dismissed for want of prosecution. File be consigned to the record.

Announced:  
18.08.2015

  
Chairman  
Camp Court Abbottabad

18.08.15

3.  
14.04.2015

Counsel for the appellant present. Learned counsel for the appellant argued that appellant was appointed as SS in BPS-17 and is serving at GHSS Beer since 4-1/2 years. That according to posting/transfer policy of the government, the appellant was to serve for one year in the heard area. That a post was up-graded in GHS Jatti Paind on 19.08.2014 and appellant applied for adjustment against the said post on 21.08.2014 but vide impugned notification dated 02.12.2014 respondent No.4, Tahir Mehmood, a newly appointed SS, was posted against the said post at GHS Jatti Paind regarding which appellant made departmental representation on 03.12.2014 which remained un-responded and hence the instant service appeal on 01.04.2015.

That the appellant is entitled to be given preference vis-à-vis the position given to respondent No.4.

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 18.06.2015 before S.B.

The appellant appeal pertains to the territorial limits of Hazara Division and as such to be heard at camp court Abbottabad.

  
Chairman

4 18.6.2015



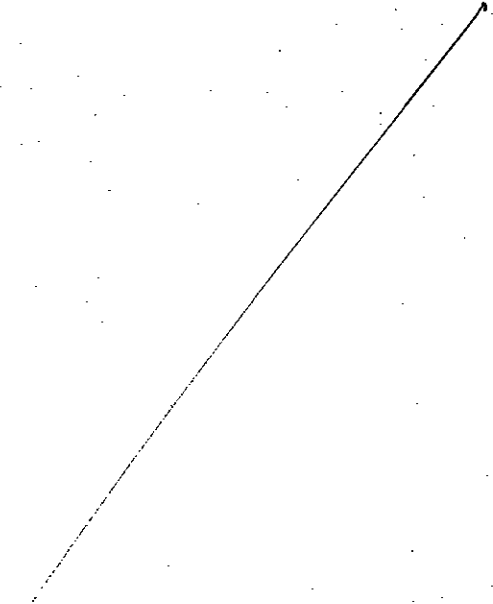
None present for appellant. Notices to the respondents could not be issued due to non-deposit of security and process fee. Notice be issued to the appellant and his counsel for 18.8.2015 before S.B at Camp Court A/Abad.

  
Chairman  
Camp Court Abbottabad

Form- A  
FORM OF ORDER SHEET

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

Case No. 294/2015


S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	06.04.2015	<p>The appeal of Mr. Zaffar Iqbal resubmitted today by Mr. Muhammad Naveed Akhtar 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		<p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>14-4-15</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> 

The appeal of Mr.Zafar Iqbal SS Pak Study GHSS Beer Distt. Haripur received to-day i.e. on 01.04.2015 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- 1- Heading of the appeal is incomplete which may be completed.
- 2- Annexure-B of the appeal is incomplete which may be completed.

No. 433 /S.T,

Dt. 2/4 /2015

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Muhammad Naveed Akhtar Adv. Pesh.

Re-submitted dated 06/04/2015 @  
Muhammad Naveed Akhtar Adv.

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

Service Appeal No. 294 2015

Zafar Iqbal

(Appellant)

**VERSUS**

Secretary Govt. of KPK, Education (E&SE) Department,  
Peshawar and others

(Respondents)

**INDEX**

S. No.	Documents	Annexure	Page No.
1	Service Appeal		1-5
2	Copy of the notification dated 14.06.2012	A	6
3	Copy of the notification	B	7-7A
4	Copy of the application dated 21.08.2014	C	8
5	Copy of transfer letter dated 08.09.2014	D	9
6	Copy of request	E	10
7	Copy of the memo	F	11
8	Copy of notification dated 10.11.2014	G	12-14
9	Copy of the representation	H	15
10	Copy of policy	I	16-19
11	Copy of the monthly salary statement for December 2014	J	20
12	Wakalat Nama		21

Appellant  
Zafar Iqbal

Through

Muhamad Naveed Akhtar

&

Farman Ullah Khalil

Advocates,

High Court, Peshawar

Dated: 01/04/2015

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

Service Appeal No. 294 2015

A.W.P. Province  
Service Tribunal

Diary No. 287

Dated 01-4-2015

Zafar Iqbal SS (Pak Study) S/o Noor Muhammad

R/o Kalla Bat Township, Haripur, presently posted at GHSS

Beer District Haripur.

\_\_\_\_\_  
(Appellant)

**VERSUS**

- 1) The Secretary Govt. of Khyber Pakhtunkhwa, Education (E&SE) Department, Peshawar
- 2) The Director of Education E&SE, Khyber Pakhtunkhwa, Peshawar
- 3) District Education Officer (M) District Haripur
- 4) Mr. Tahir Mehmood (SST) S/o Sardar Muhammad presently posted at GHSS Jatti Pind District Haripur.

\_\_\_\_\_  
(Respondents)

**Appeal Under Section 4 of**

**Khyber Pakhtunkhwa Service Tribunal Act 1974**

Against the Notification dated 02-12-2014

  
4/4/15  
**Prayer:**

On acceptance of this appeal this honourable tribunal may be pleased to direct the respondents to adjust / transfer and post the appellant at GHSS Jatti Pind District Haripur as SS (Pak Study)

Re-submitted to-day  
and filed:

  
6/4/15

**Respectfully Sheweth,**

Brief facts giving rise to the instant service appeal are as following:

- 1) That the appellant is serving / appointed in Education Department as Subject Specialist since 1997.
- 2) That the appellant was posted and transferred in different stations / schools during his service.
- 3) That the appellant was posted as SS (Pak Study) at and remained at different schools as SST and presently posted at GHSS Beer Haripur since 01.09.2010 which is a far flung and hard area about 50 Kilometers away from the native village of the appellant. *Copy of posting Order is Annex - A.*
- 4) That the appellant has served almost all his service in hilly and hard areas.
- 5) That on 19.08.2014 the GHS Jatti Pind was up graded to GHSS Jatti Pind through notification No. BOV/FD/2-31/2012-13/Haripur. (Copy of the notification is attached as Annexure B)
- 6) That on 21.08.2014 the appellant applied to the department for his adjustment / transfer to the vacant post of SS (Pak Study) at GHSS Jatti Pind falling in the native union council of the appellant. (Copy of the application dated 21.08.2014 is attached as Annexure C)

- 7) That it is worthy to mention here that wife of the appellant is also SS (Bio) and is posted at GGHSS Kalla Bat Township, Sector No. 2, Haripur.
- 8) That the appellant was served with the reply dated 08.09.2014 bearing No. 4244/F.No.9P/Transfers. (Copy of transfer letter dated 08.09.2014 is attached as Annexure D)
- 9) That on 23.09.2014 the appellant filed another application through proper channel for his adjustment / transfer at GHSS Jatti Pind. (Copy is attached as Annexure E)
- 10) That the application of the appellant for his transfer / adjustment was forwarded to the Director by the District Education Officer, Haripur dated 24.09.2012 bearing No. 21996. (Copy of the memo is attached as Annexure F)
- 11) That respondent No. 4 was appointed as SS (Pak Study) and was posted at GHSS Jatti Pind through Notification dated 02.12.2014 No. SO (S/M) E&SED/3-2/2014 recruitment of SS Pak Study (BS-17) (Male). (Copy is attached as Annexure G)
- 12) That the appellant also filed departmental representation for his adjustment / transfer before respondent No. 1 but to no avail. (Copy of the representation is attached as Annexure H)



- 13) That the appellant having no other adequate remedy begs leave of this honourable tribunal on the following amongst other grounds.

**GROUND:**

- a) That the appellant is serving in different hard areas from almost 18 years.
- b) That under the policy the normal tenure posting is 3 years while for hard areas the tenure is 1 year. (Copy is attached as Annexure I)
- c) That recently the appellant is serving in hard area since 03 September 2010 in GHSS Beer Haripur. (Copy of the monthly salary statement for December 2014 is attached as Annexure J)
- d) That selection and posting of respondent No. 4 at GHSS Jatti Pind is not only against law of land but also against norms of natural justice.
- e) That to be treated in accordance with law and enjoy equal protection of law is inalienable right of every citizen guaranteed under the constitution of Islamic Republic of Pakistan, 1973.
- f) That the refusal of the respondents to transfer / post the appellant on merits offends the constitutional guarantees by the constitution of the land.

- 71
- g) That posting of respondent No. 4 on the said post by respondent No. 1 to 3 is on extraneous consideration, accommodating the blue eyed and influential person motivated by political pressure.
- h) That other grounds may be advanced at the time of arguments before the honourable tribunal.

**It is therefore, humbly requested that on acceptance of this service appeal, this honourable tribunal may be pleased to direct the respondents No. 1 to 3 to adjust / transfer and post the appellant at GHSS Jatti Pind District Haripur as SS (Pak Study).**

Appellant

Zafar Iqbal



Through

**Muhamad Naveed Akhtar**

&

**Farman Ullah Khalil**

Advocates,

High Court, Peshawar

Dated: 01/04/2015

GOVERNMENT OF PESHAWAR  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Dated Peshawar the July 1<sup>st</sup>, 2010

NOTIFICATION

NO.SO(S)/E&SE/4-16/2010/Zafar Iqbal. The Competent Authority is pleased to transfer Mr.Zafar Iqbal, Subject Specialist Pak. Study (B-17) GHSS Olandar District Shangla and to post him as Subject Specialist Pak.Study (B-17) GHSS Beer Haripur on the retirement of present incumbent in the interest of public service and in relaxation of ban.

3. No TA/DA is allowed.

SECRETARY

Endst: of even No. & Date

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Accounts Officer, concerned.
4. PS to Minister for Elementary & Secondary Education, Khyber Pakhtunkhwa.
5. Programmer Schools Section E&SE Department.
6. PS to Secretary Elementary & Secondary Education Department, Khyber Pakhtunkhwa.
7. Officer concerned.
8. Office order file.

(Syed Ahmad Khan)  
SECTION OFFICER (SCHOOLS)

Attested to be  
true copy

A



B

7

GOVT. OF KHYBER PAKHTUNKHWA  
FINANCE DEPARTMENT

No. BOV/FD/2-31/2012-13/Haripur.

Dated Peshawar the 19-08-2014.

To

The Secretary to Govt. of Khyber Pakhtunkhwa,  
Elementary & Secondary Education Department, Peshawar.

Subject:- UP-GRADATION OF GOVT:HIGH SCHOOL TO HIGHER SECONDARY LEVEL(MALE & FEMALE) DURING THE FINANCIAL YEAR 2014-15.

Dear Sir,

I am directed to refer to your Department letter No. SO(B&A)4-29/Haripur dated 21/07/2014 on the subject noted above and to state that Finance Department agrees to creation the posts for Upgradation of the following Govt:High Schools to Govt: Higher Secondary School level as developmental scheme, on temporary basis in District Haripur with effect from 01-08-2014 at a total cost of Rs.12,298,000/- as per details given below, subject to the observance of all codal formalities.

I am further to inform that the post of Headmasters (BPS-17) sanctioned for the following Government High Schools District Haripur are hereby abolished with immediate effect, being no more required: -

Detail of Posts	Code No. HR-7080 GHSS Kahal Bala	Code No.HR-7161 GHSS Jatti Pind	Total
Principal (B-18)	01	01	02
Subject Spec: (B-17)	10	10	20
Director Physical Education (B-17)	01	01	02
Senior Clerk: (B-09)	01	01	02
Lab:Asstt (B-07)	01	01	02
Lab:Attent (B-01)	01	01	02
Naib Qasid (B-01)	01	01	02
Chowkidar (B-01)	01	01	02
<b>Total: -</b>	<b>17</b>	<b>17</b>	<b>34</b>
A01101-Pay of Officers	2,156,000	2,156,000	4,312,000
A01151-Pay of O/ Staff	310,200	310,200	620,400
A01202-House Rent Allow	424,600	424,600	849,200
A01203-Conveyance Allow:-	755,700	755,700	1,511,400
A01207-Washing Allow:	1,100	1,100	2,200
A01208-Dress Allowance	1,100	1,100	2,200
A01217-Medical Allow:	39,380	39,380	78,760
A0120D-Intergrated Allow	3,300	3,300	6,600
A0120X-Adhoc Allow(2010)	762,300	762,300	1,524,600
A0121A-AdhocAllw(2011)	228,800	228,800	457,600
A0120M-Adhoc Allw(2012)	492,800	492,800	985,600
A0121T-Adhoc Allw(2013)	369,600	369,600	739,200
-Adhoc Allw(2014)	246,400	246,400	492,800
A01238-Charge Allowance	1,100	1,100	2,200
A01253-Science Teaching Allow:	2,200	2,200	4,400
<b>Total:-</b>	<b>6,149,000</b>	<b>6,149,000</b>	<b>12,298,000</b>

2. The Expenditure involved is debitable to the Functional-cum-Object classification 09-Education Affairs and Services, 092-Secondary Education Affairs and Services, 0921-Secondary Education Affairs and Services, 092101- Secondary Education and shall be met out from within the sanction Budget Grant 2014-15, through the following Re-appropriation out of the Lump sum provision made in the Budget Estimates 2014-15:-

SENDER FUND	SENDER COST CENTRE	OBJECT HEAD
NC21073 (46)	PR-5211-Lump sum provision	A039704037-Others

RECEIVER FUND	RECEIVER COST CENTRE	OBJECT HEAD	AMOUNT
NC21073(46)	1.HR-7080 GHSS Kahal Bala 2.HR-7161 GHSS Jatti Pind	As per detail given above	12,298,000/-

PTO

5

Contd:

7-A

3. Audit Copy may please be prepared and sent to this Department for authentication accordingly.

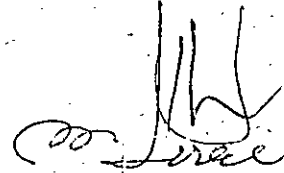
Yours faithfully.

(ISRAK AHMAD)  
BUDGET OFFICER-V.

Endst: No. & date as above.

Copy forwarded to:-

- 1- The Director, Elementary & Secondary Education, Peshawar.
- 2- The District Officer (Male & Female) Elementary & Secondary Education, Haripur.
- 3- The Director, FMIU Finance Department.
- 4- The Budget Officer-X, Finance Department.
- 5- Master File.



BUDGET OFFICER-V.

C

8

To

**The Secretary,**  
Elementary & Secondary Education Department,  
Govt. of Khyber Pakhtunkhawa.  
**Peshawar**

**THROUGH PROPER CHANNEL.**

Sub:

**REQUEST FOR ADJUSTMENT/TRANSFER AGAINST NEWLY  
CREATED POST AT GHSS JATTI PIND HARIPUR.**

*Respected Sir,*

With due respect, it is submitted that I am serving as SS(Pak Study)BPS-17 in E&SE Department, District Haripur at present, I am serving at GHSS Beer, District Haripur since **01/09/2010 (4 YEARS)** and **I have already completed the tenure of hard area.** Being a far flung hilly and hard station of District Haripur, I have to bear great hardships in daily travelling to perform my duties. Moreover, I have served as CT at GHS Manjakot District Torghar about **3 years** and as SS (PS) at GHSS Olandar District Shangla which are far flung and hilly hard areas in out districts.

Now at my nearest village GHS Jatti Pind District Haripur has been upgraded to Higher Secondary status vide No BOV/FD/2-31/2012-13/ Haripur dated Peshawar 19.08.2014. (Copy attached). This school is in quite in vicinity to my residence. It is further added that to run the newly up-graded Higher Secondary School at Jatti Pind Haripur in the best interest of public service, the staff is required to be posted, so as to make the enrollment of the students who are seeking admission therein.

In the light of the above, it is humbly prayed that I may please be adjusted/transferred on the newly created post of SS (Pak Study) at GHSS Jatti Pind District Haripur. It will greatly help me in performing my duties more efficiently.

Thanking you in anticipation.

Yours Obediently,

**(ZAFAR IQBAL)**  
**SS (Pak Study),**  
**GHSS Beer, District Haripur.**

Date. 21-8-2014.

*Attested to be  
true copy  
Q*

F. A. to Director B & S B  
Khyber Pakhtunkhwa Peshawar  
D. No.....1123  
Dated.....  
25/8/14



D  
DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA.

NO. 4244 / F.No.9 P/Transfer SS.  
Dated Peshawar the, 2/9 2014.

Imp. Pelt: EB  
Dr. urgent  
12/9/14

To  
The District Education  
Officer (Male) Haripur

Subject: - APPLICATION FOR TRANSFER

I am directed to refer to the subject noted above and to ask you that Mr. Zafar Iqbal SS (PS) B-17 and Shahid Zaman SS (Maths) B-17 at GHSS Beer has applied for posting/transfer to GHSS Jatti Pind newly up-graded school. You are, therefore requested to inform the SS concerned to provide the following information / documents in addition to your views/comments to process the case further.

1. Application duly signed by the Principal concerned.
2. A copy of adjustment order at present station.
3. The case may be forwarded through proper channel.

11/1  
Deputy Director (Establishment)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar.

Encl. No. 12689 dated 18-9-14

Forwarded to the Principal GHSS Beer with the remarks that documents demanded by Deputy Director in 20 SS of your school may be furnished to the office of the Undersigned as soon as possible.

Attested to be  
true copy

Q

DOE (M)  
17/9

10

E

207

To

**The Secretary,**  
Elementary & Secondary Education Department,  
Govt. of Khyber Pakhtunkhawa.  
**Peshawar**

**THROUGH PROPER CHANNEL.**

Sub:

**REQUEST FOR ADJUSTMENT/TRANSFER AGAINST NEWLY  
CREATED POST AT GHSS JATTI PIND HARIPUR.**

*Respected Sir,*


With due respect, it is submitted that I am serving as SS(Pak Study)BPS-17 in E&SE Department, District Haripur at present, I am serving at GHSS Beer, District Haripur since **01/09/2010 (4 YEARS)** and **I have already completed the tenure of hard area.** Being a far flung hilly and hard station of District Haripur, I have to bear great hardships in daily travelling to perform my duties. Moreover, I have served as CT at GHS Manjakot District Torghar about **3 years** and as SS (PS) at GHSS Olandar District Shangla which are far flung and hilly hard areas in out districts.

Now at my nearest village GHS Jatti Pind District Haripur has been upgraded to Higher Secondary status vide No BOV/FD/2-31/2012-13/ Haripur dated Peshawar 19.08.2014. (Copy attached). This school is in quite in vicinity to my residence. It is further added that to run the newly up-graded Higher Secondary School at Jatti Pind Haripur in the best interest of public service, the staff is required to be posted, so as to make the enrollment of the students who are seeking admission therein.

In the light of the above, it is humbly prayed that I may please be adjusted/transferred on the newly created post of SS (Pak Study) at GHSS Jatti Pind District Haripur. It will greatly help me in performing my duties more efficiently.

Thanking you in anticipation.

Yours Obediently,

  
(ZAFAR IQBAL)  
SS (Pak Study),  
GHSS Beer, District Haripur.

Date. 23/9/2014.

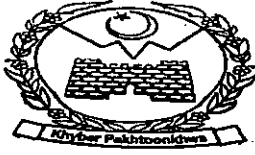
*Forwarded to DEED (M)  
E&SE for n/a ps.  
19/9/2014*

**PRINCIPAL**  
Govt. Higher Secondary School  
Beer District Haripur.

*Attested to  
be true copy*







F  
Office of the District Education Officer

(11)

PH No. 0995-610178, 610268

No. 12996/

Dated 21/08/2014.

To

The Director,  
Elementary & Secondary Education,  
Khyber Pakhtunkhwa, Peshawar.

SUBJECT:- APPLICATION FOR TRANSFER.  
Memo:

Reference your Memo: No.4244/F.No.9 P/Transfer SS.  
Dated 8/9/2014 on the subject mentioned above.

Please find enclosed herewith the applications in respect of  
Mr.Zafar Iqbal SS (PS) B-17 and Shahid Zaman SS (Maths) B-17  
forwarded by Incharge Principal GHSS Beer (Haripur). The required  
documents are hereby enclosed and case is resubmitted for necessary  
action please.

District Education Officer  
Haripur

Attested to be  
true copy



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

NOTIFICATION

Dated Peshawar the December 02, 2014

**NO.SO(S/M)E&SED/3-2/2014/Recruitment of SS Pak Study (BS-17) (Male):**

Consequent upon recommendations of Khyber Pakhtunkhwa Public Service Commission Peshawar, the Competent Authority is pleased to appoint the following Sixteen (16) candidates of Teaching Cadre as Subject Specialist Pak Study (BS-17) Male (Rs.16000-1200-40000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government with immediate effect on the terms and conditions as given below:-

Sr.No.	Name with Father's Name and Address	Domicile/ Zone
1.	Mr. Fazal Azeem S/O Atta Muhammad, Moh. Sahibzadgan, Vill: & P.O Karbogha Sharif Tehsil Thal District Hangu.	Hangu/ 4
2.	Mr. Habib-ur-Rehman S/O Muhammad Yousaf, House No.816 Khalabat Town Ship Sector No.4, Mohallah Darband Haripur Hazara.	Haripur/ 5
3.	Mr. Hafiz Ullah S/O Aziz Khan, Wazir Muhammad Tailors Shop No.2164 Bazzar-e-Islamabad Back Qissa Khwani Peshawar.	Chitral/ 3
4.	Mr. Ijaz Ali S/O Ghulam Muhammad, Al-Asar Higher Secondary Public School Ustarzai Payan District Kohat.	Mardan/ 2
5.	Mr. Iltaf Khan S/O Fazal Karim, Vill: Banda Chail P.O Khesghi Payan Tehsil and District Nowshera.	Nowshera/ 2
6.	Mr. Javed S/O Bakht Zamin, Village Ouch East Mohallah New Colony Tehsil Adenzai District Dir Lower.	Dir Lower/ 3
7.	Mr. Lal Muqaddar Khan S/O Lal Zumrad Khan, Saeed Auto Champ Chawok Panian P.O Panian Tehsil and District Haripur.	Haripur/ 5
8.	Mr. Mati-ur-Rehman S/O Mehar Rehman, SET Govt. High School, Kotha Tehsil Topi District Swabi.	Swabi/ 2
9.	Mr. Muhammad Iqbal S/O Muhammad Sherin, Pakistan Study Center University of Peshawar.	Upper Dir/ 3
10.	Mr. Shah Faisal Khan S/O Bashir Khan, V. P.O Madey Baba Tehsil Takht Bhai District Mardan.	Mardan/ 2
11.	Mr. Shah Wali Ullah S/O Molvi Abdul Majeed, Village Jilal P.O Ranolia Tehsil Pattan District Kohistan.	Kohistan/ 3
✓ 12.	Mr. Tahir Mehmood S/O Sardar Mohammad, Fauji Foundation Higher Secondary School Haripur, Near District Headquarter Hospital Dhand Road Haripur.	✓ Haripur/ 5 ✓
13.	Mr. Hayat Ullah S/O Fard-ul-Azam, Vill: P.O Haya Seri Tehsil Balambat District Dir Lower.	Dir Lower/ 3
14.	Mr. Muhammad Haroon S/O Abdul Munim, New Block 22-A Distirct Courts Mardan.	Mardan/ 2
15.	Mr. Muhammad Iftikhar S/O Muhammad Amin, Village and P.O Mandhra Kalan Tehsil and Distict Der Ismail Khan.	D.I.Khan/4
16.	Mr. Tariq Amin S/O Fazal Maula, Jahangir Karyana Store Malakand Road Takht Bhai, Mardan.	Dir Lower/ 3

2. Consequent upon their appointment as Subject Specialist Pak Study BS-17 Male, they are posted on positions and stations as noted against each.

Attested to be  
true copy

Q

*[Signature]*  
15/12/14

Sr. #	Name with Father's Name and address.	Posted as	Remarks
1	Mr. Fazal Azeem S/O Atta Muhammad, Moh. Sahibzadgan, Vill: & P.O Karbogha Sharif Tehsil Thall District Hangu.	Subject Specialist Pak Study BS-17 GHSS Dallan District Hangu.	Against vacant post
2	Mr. Habib-ur-Rehman S/O Muhammad Yousaf, House No.816 Khalabat Town Ship Sector No.4, Mohallah Darband Haripur Hazara.	Subject Specialist Pak Study BS-17 GHSS Bareela District Haripur.	-do-
3	Mr. Hafiz Ullah S/O Aziz Khan, Wazir Muhammad Tailors Shop No.2164 Bazaar-e-Islamabad Back Qissa Khwani Peshawar.	Subject Specialist Pak Study BS-17 GCMHSS Nehaqi District Peshawar.	The post is not vacant in his Domicile Distt., hence he is proposed for adjustment at nearest Distt.
4	Mr. Ijaz Ali S/O Ghulam Muhammad, Al-Asar Higher Secondary Public School Ustarzal Payan District Kohat.	Subject Specialist Pak Study BS-17 GHSS Pir Abad District Mardan.	Against vacant post
5	Mr. Iltaf Khan S/O Fazal Karim, Vill: Banda Chail P.O Khesghi Payan Tehsil and District Nowshera.	Subject Specialist Pak Study BS-17 GHSS Nizampur District Nowshera.	-do-
6	Mr. Javed S/O Bakht Zamin, Village Ouch East Mohallah New Colony Tehsil Adenzai District Dir Lower.	Subject Specialist Pak Study BS-17 GHSS Khair Abad District Dir Lower.	-do-
7	Mr. Lal Muqaddar Khan S/O Lal Zumrad Khan, Saeed Auto Champ Chawok Panian P.O Panian Tehsil and District Haripur.	Subject Specialist Pak Study BS-17 GHSS Kahal Bala District Haripur.	-do-
8	Mr. Mati-ur-Rehman S/O Mehar Rehman, SET Govt. High School, Kotha Tehsil Topi District Swabi.	Subject Specialist Pak Study BS-17 GHSS Shah Salim District Swabi.	-do-
9	Mr. Muhammad Iqbal S/O Muhammad Sherin, Pakistan Study Center University of Peshawar.	Subject Specialist Pak Study BS-17 GHSS Akhagram District Dir Upper.	-do-
10	Mr. Shah Faisal Khan S/O Bashir Khan, V. P.O Madey Baba Tehsil Takht Bhai District Mardan.	Subject Specialist Pak Study BS-17 GHSS Mandani District Charsadda.	The post is not vacant in his Domicile Distt., hence he is proposed for adjustment at nearest Distt.
11	Mr. Shah Wali Ullah S/O Molvi Abdul Majeed, Village Jilal P.O Ranolia Tehsil Pattan District Kohistan.	Subject Specialist Pak Study BS-17 GHSS Bataira District Kohistan.	Against vacant post
12	Mr. Tahir Mehmood S/O Sardar Mohammad, Fauji Foundation Higher Secondary School Haripur, Near District Headquarter Hospital Dhand Road Haripur.	Subject Specialist Pak Study BS-17 GHSS Jati Pind District Haripur.	-do-
13	Mr. Hayat Ullah S/O Fard-ul-Azam, Vill: P.O Haya Seri Tehsil Balambat District Dir Lower.	Subject Specialist Pak Study BS-17 GHSS Haya Serai District Dir Lower.	-do-
14	Mr. Muhammad Haroon S/O Abdul Munim, New Block 22-A Distirct Courts Mardan.	Subject Specialist Pak Study BS-17 GHSS Kohi Barmol District Mardan.	-do-
15	Mr. Muhammad Iftikhar S/O Muhammad Amin, Village and P.O Mandhra Kalan Tehsil and Distict Der Ismail Khan.	Subject Specialist Pak Study BS-17 GHSS Mandran Kalan District D.I.Khan.	-do-
16	Mr. Tariq Amin S/O Fazal Maula, Jahangir Karyana Store Malakand Road Takht Bhai, Mardan.	Subject Specialist Pak Study BS-17 GHSS Lal Qala District Dir Lower.	-do-

Attested to be  
true copy

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Impress  
15/11/14

### 3. Terms & Conditions

1. Their pay will be released subject to verification of academic documents/ testimonials from the concerned Board/ University by the District Education Officer (Male) concerned.
2. Their services will be considered regular and they will be eligible for pension/deduction of GP fund in terms of Khyber Pakhtunkhwa Civil Servants Act 1973 as amended in 2013.
3. Their services are liable to termination on one month's notice from either side. In case of resignation without notice, their one month's pay/allowances shall be forfeited to the Govt.
4. They would be on probation for period of one year extendable for another one year.
5. They will be governed by such rules and regulations as may be issued from time to time.
6. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they will be proceeded against under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 as amended from time to time.
7. Their recruitment shall be School Based and shall not be transferable to any other School.
8. The appointees should join their posts within 30 days of the issuance of this notification. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar would furnish a certificate to the effect that the candidates have joined the posts otherwise, after one month of the issuance of this Notification, failing which their candidature shall expire automatically and no subsequent appeal etc. shall be entertained.
9. Charge report should be submitted to all concerned.
10. No TA/DA will be allowed to the appointees for joining their duty.

**SECRETARY**

Endst: of even No. & Date

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officers (Male), concerned.
4. Director (Recruitment), Khyber Pakhtunkhwa Public Service Commission.
5. District Accounts Officers concerned.
6. PS to Chief Secretary Khyber Pakhtunkhwa.
7. PS to Minister for E&SE Khyber Pakhtunkhwa.
8. PS to Secretary E&SE Department, Khyber Pakhtunkhwa, Peshawar.
9. Incharge EMISE E&SE Department.
10. Notification can be downloaded from our website: [www.kpese.gov.pk](http://www.kpese.gov.pk).
11. Officers concerned.
12. Office order file.

*Mujeeb-ur-Rehman*  
02/12/14  
(MUJEEB-UR-REHMAN)  
SECTION OFFICER (SCHOOLS/MALE)

*attested to be  
true copy*

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*Mujeeb-ur-Rehman*  
02/12/14

**Before Honourable Secretary E & SE Khyber Pakhtoonkhawa**

**Subject: Departmental representation for adjustment in newly upgraded GHSS Jatti Pind Haripur on the post of SS(Pak Study) on humanitarian grounds**

Respected Sir,

Facts are as under:

1. That I am permanent resident of KTS, Haripur and joined E&SE Department as CT on 01-7- 1997 and served at District Torgher for 3 years (190 km from my native village).
2. That later on I was selected as SST(G) by Khyber Pakhtoonkhawa Public Service Commission on 01-9-2002 and posted at far flung and hard area station of GHS Chajjian District Haripur(70 Km from my native village).
3. That later on I was selected as SS(Pak Study) by Khyber Pakhtoonkhawa Public Service Commission on 13-2-2010 and posted at far flung and hard area station of GHSS Olander District Shangla.(300 Kms from my native town)
4. That I was transferred at far flung and hard area station of GHSS Beer Haripur on 01-9-2010 which is 50km from my native village and I am still serving there.(4 years 3 months)
5. That my spouse is also government servant and serving as SS(BIO) at GGSS KTS Sector No 2 Haripur and in accordance to the notification of Govt of Kyhber Pakhtoonkhawa both may be posted at the same or nearest station in case of availibility of post.
6. That on up-gradation of GHS Jatti Pind Haripur to higher Secondary Status, I applied to the department for my adjustment on 21-8-2014 on the vacant post of SS(Pak Study) at GHSS Jatti Pind Haripur( i.e. nearest to my home town) but due to unknown reasons my request was not considered by the department and the post has been filled up through a fresh appointee.
7. That condition of fresh appointee is endorsed that their appointment are on school based, it means that it will not possible to adjust me in future on my nearest institution.
8. That from the perusal of para (3)& (4) above it is quite clear that on the post of SS(Pak Study) I have completed five years continue service out of station at a long distance and also in hard area.

In the light of the above stated facts, it is humbly prayed that appointment of Mr. Tahir Mehmood SS(Pak Study) at GHSS Jatti Pind Haripur may please be reviewed by issuing a corrigendum to adjust him on my place i.e. GHSS Beer Haripur and I may please be given a chance to serve to my nearest station i.e GHSS Jatti Pind Haripur on humanitarian ground keeping in view my long tenure in out of station/hard area as explained in Para (3) & (4) above and being government employee as a couple.

Hoping favourable response in the interest of justice please.

*Submitted in original to the authority concerned for favourable consideration pl.* Appellant

Ends No. 152 Date: 03/12/2014  
Documents Enclosed

1. Photocopy of application submitted
2. Photocopy of Observation made by Dy Director (Establishment)
3. Photocopy of Reply of D.E.O(M) Haripur along with application
4. Photocopy of Order of fresh appointee Mr. Tahir Mehmood

*Submitted to the authority concerned*

*Principal*

*SS(Pak Study) GHSS Beer Haripur.*

*Higher Secondary School*

*Distt: Haripur*

*Mr. Tahir Mehmood*

*Attested to be true copy*

*Self explanatory application submitted to the Director, E&SE, Khyber Pakhtoonkhawa for posted please.*



**GOVERNMENT OF NWFP  
ESTABLISHMENT & ADMINISTRATION  
DEPARTMENT  
(Regulation Wing)**

**POSTING / TRANSFER POLICY OF THE PROVINCIAL GOVERNMENT.**

- i) All the posting/transfers shall be strictly in public interest and shall not be abused/misused 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 posing/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) { }
- vi) While making postings/transfer from settled areas to FATA and vice-versa, specific approval of Governor, NWFP needs to be obtained

**<sup>2</sup>While making postings/transfers of officers/officials up to BS-17, from settled areas to FATA and vice-versa approval of the Chief Secretary NWFP needs to be obtained. Whereas, in case of posting/transfer of officers in BS-18 and above, from settled areas to FATA and vice versa, specific approval of the Governor NWFP shall be obtained.**

- vi (a) All Officers/officials selected against Zone-I/FATA quota in the Provincial Services should compulsorily serve in FATA for atleast eighteen months in each grade. This should start from senior most scales/grades downwards in each scale/grade of each cadre.
- vii) Officers may be posted on executive/administrative posts in the Districts of their domicile except District Coordination Officers (D.C.Os) and DPOs/Superintendent of Police (SP). Similarly Deputy Superintendent of Police (DSP) shall not be posted at a place where the Police Station (Thaana) of his area/residence is situated.

<sup>1</sup> Para-1(v) regarding months of March and July for posting/transfer and authorities for relaxation of ban deleted vide letter No: SOR-VI (E&AD) 1-4/2008/Vol-VI, dated 3-6-2008. Consequently authorities competent under the NWFP Government Rules of Business, 1985, District Government Rules of Business 2001, Posting/Transfer Policy and other rules for the time being in force, allowed to make posting/transfer subject to observance of the policy and rules.

<sup>2</sup> Added vide Urdu circular letter No. SOR-VI(E&AD)1-4/2003, dated 21-09-2004

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- viii) No posting/transfers of the officer's/officials on detailment basis shall be made.
- ix) Regarding the posting of husband/wife, both in Provincial services, efforts where possible would be made to post such persons at one station subject to the public interest.
- x) All the posting/transferring authorities may facilitate the posting/transfer of the unmarried female government Servants at the station of the residence of their parents.

(xi) Officers/officials except DCOs and DPOs/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 there till the retirement  
**DCOs and DPOs who are due to retire in the near future may also be posted in the District of their domicile subject to the condition that such posting would be against non-administrative posts of equivalent scales;**

xii) In terms of Rule-17(1) and (2) read with Schedule-III of the NWFP Government Rules of Business 1985, transfer of officers shown in column 1 of the following table shall be made by the authorities shown against each officer in column2 thereof:

Outside the Secretariat		
1.	Officers of the all Pakistan Unified Group i.e. DMG, PSP including Provincial Police Officers in BPS-18 and above.	Chief Secretary in consultation with Establishment Department and Department concerned with the approval of the Chief Minister.
2.	Other officers in BPS-17 and above to be posted against scheduled posts, or posts normally held by the APUG, PCS(EG) and PCS(SG).	-do-
3.	Heads of Attached Departments and other Officers in B-19 & above in all the Departments.	-do-
In the Secretariat		
1.	Secretaries	Chief Secretary with the approval of the Chief Minister.
2.	Other Officers of and above the rank of Section Officers: a) Within the Same Department b) Within the Secretariat from one Department to another.	Secretary of the Department concerned. Chief secretary/Secretary Establishment.
3.	Officials up to the rank of Superintendent:	

<sup>1</sup> Added vide Urdu circular letter No: SOR-VI (E&AD)/1-4/2005, dated 9-9-2005.



a) Within the same Department	Secretary of the Department concerned.
b) To and from an Attached Department	Secretary of the Dept in consultation with Head of Attached Department concerned.
c) Within the Secretariat from one Department to another	Secretary (Establishment)

xiii) While considering posting/transfer proposals all the concerned authorities shall keep in mind the following:

- a) To ensure the posting of proper persons on proper posts, the Performance Evaluation Report/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/transfer 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 posing/transfer or posting transfer in violation of the provisions of this policy.
- ii) Serious and grave personal (humanitarian) grounds.

2. 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 Officers 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.

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

- a) Transfer the holder of a tenure post before the completion of his tenure or extend the period of his tenure.
- b) Require an officer to hold charge of more than one post for a period exceeding two months.

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

.....

All concerned are requested to ensure that tenures of the concerned officers/officials are invariably mentioned in summaries submitted to the Competent Authorities for Posting/Transfer.  
{Authority: Letter No: SOR-VI/E&AD/1-4/2003 dated 24-6-2003}.

.....

It has been decided by the Provincial Government that posting/transfer orders of all the officers up to BS-19 except Heads of Attached Departments irrespective of grades will be notified by the concerned Administrative Departments with prior approval of the Competent Authority obtained on the Summary. The Notifications/orders should be issued as per specimen given below for guidance.

All posting/transfer orders of BS-20 and above and Heads of Attached Departments (HAD) shall be issued by the Establishment Department and the Administrative Departments shall send approved Summaries to E&A Department for issuance of Notifications.

**SPECIMEN NOTIFICATION.**

**GOVERNMENT OF NWFP  
NAME OF ADMINISTRATIVE  
DEPARTMENT**

Dated Peshawar, \_\_\_\_\_

**NOTIFICATION**

NO. The Competent Authority is pleased to order the transfer of Mr. \_\_\_\_\_ Department and to post him as \_\_\_\_\_ in the interest of public service, with immediate effect.

**CHIEF SECRETARY  
GOVERNMENT OF NWFP**

Endst. No. and date even.

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**Government of Khyber Pakhtunkhwa  
District Accounts Office Haripur  
Monthly Salary Statement (December-2014)**



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**Personal Information of Mr ZAFAR IQBAL d/w/s of NOOR MUHAMMAD**

Personnel Number: 00253478      CNIC: 1330240254551      NTN: 3908593-7  
Date of Birth: 13.06.1970      Entry into Govt. Service: 01.07.1997      Length of Service: 17 Years 06 Months 001 Days

**Employment Category: Active Permanent**

Designation: SUBJECT SPECIALIST      Vendor Number:  
DDO Code: HR7053-Head Master G.H.S Beer Haripur.      60000003-Education Schools  
Payroll Section 002      GPF Section 001      Cash Center  
GPF A/C No: EDUMA012291      Interest Applied: Yes      GPF Balance: 343,644.00

**Pay and Allowances:**      Pay scale: BPS For - 2011      Pay Scale Type: Civil      BPS: 17      Pay Stage: 8

Wage type		Amount	Wage type		Amount
0001	Basic Pay	25,600.00	1000	House Rent Allowance	2,955.00
1210	Convey Allowance 2005	5,000.00	1947	Medical Allow 15% (16-22)	1,921.00
1948	Adhoc Allowance 2010@ 50%	6,405.00	1968	Incentive Allowance 20%	2,000.00
1970	Adhoc Relief Allow 2011	1,921.00	2118	Adhoc Relief Allow (2012)	5,120.00
2148	15% Adhoc Relief All-2013	3,840.00	2174	Adhoc Relief Allow-2014	2,560.00

**Deductions - General**

Wage type		Amount	Wage type		Amount
3017	GPF Subscription - Rs2240	-2,240.00	3501	Benevolent Fund	-250.00
3511	Addl Group Insurance	-25.00	3604	Group Insurance	-230.00
3609	Income Tax	-720.00	3990	Emp.Edu. Fund KPK	-200.00

**Deductions - Loans and Advances**

Loan	Description	Principle amount	Deduction	Balance

**Deductions - Income Tax**

Payable: 12,999.40      Recovered till December-2014: 4,205.00      Exempted:      Recoverable: 3,595.55

**Gross Pay (Rs.): 57,322.00      Deductions: (Rs.): -3,665.00      Net Pay: (Rs.): 53,657.00**

Payee Name: ZAFAR IQBAL  
Account Number: PLS 5779-6  
Bank Details: BANK OF KHYBER, 080019 G.T.ROAD HARIPUR G.T.ROAD HARIPUR, HARIPUR

Leaves:      Opening Balance:      Availed:      Earned:      Balance:

Permanent Address: HARIPUR

City: HARIPUR

Domicile: NW - NWFP

Housing Status: No Official

Temp. Address:

City:

Email:

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