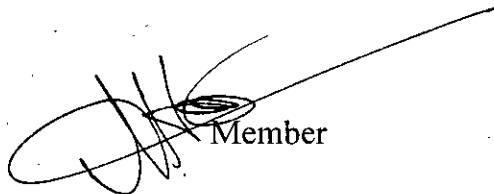


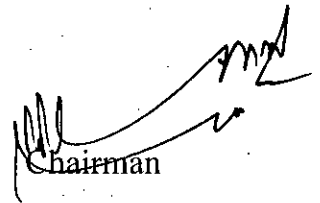
488/15

26.10.2017

Counsel for the appellant and Mr. Muhammad Jan, DDA alongwith Daud Jan, Superintendent for the respondents present. Learned counsel for the appellant requested for withdrawal of the appeal.

In view of the above, the present appeal is dismissed as withdrawn. File be consigned to the record room.

  
Member

  
Chairman

ANNOUNCED  
26.10.2017

27.10.2016

Counsel for the appellant, Mr. Muhammad Jan, GP for official respondents and counsel for private respondent No. 3 present. Rejoinder submitted. To come up for arguments on 01.03.2017.

  
(PIR BAKHSH SHAH)  
MEMBER

  
(ABDUL LATIF)  
MEMBER

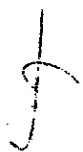
01.03.2017


Clerk counsel for appellant and Mr. Daud Jan, Superintendent alongwith Mr. Ziaullah, Government Pleader for official respondents No. 1 & 2 and counsel for private respondent No. 3 present. Clerk counsel for appellant requested for adjournment as learned counsel for appellant is busy in other superior court. Adjournment granted. To come up for arguments on 20.06.2017 before D.B.

  
(AHMAD HASSAN)  
MEMBER

  
(ASHFAQUE TAJ)  
MEMBER

20.06.2017


  
Agent to counsel for the appellant and Mr. Syed Daud Jan, Supdt alongwith Mr. Kabir Ullah Khattak, Assistant AG for the respondents present. Agent to counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 26.10.2017 before D.B.

  
(Muhammad Amin Khan Kundi)  
Member

  
(Gul Zeb Khan)  
Member

26.11.2015

Appellant in person, Daud Jan, Supdt. for respondents No. 1 and 2 alongwith Addl. A.G and counsel for private respondent No. 3 present. Para-wise comments on behalf of respondents No. 1 and 2 submitted. Private respondent No. 3 requested for adjournment. Last opportunity granted. To come up for written reply/comments on behalf of private respondent No. 3 on 24.3.2016 before S.B.

  
Chairman

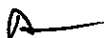
24.03.2016

Appellant in person, Mr. Daud Jan, Supdt. alongwith Assistant AG for official respondents No. 1 and 2 and counsel for private respondent No. 3 present. Written statement by private respondent No. 3 also submitted. The appeal is assigned to D.B for rejoinder and final hearing for 12.7.2016.

  
Chairman

12.07.2016

Counsel for the appellant and Mr. Daud Jan, Supdt. alongwith Mr. Muhammad Jan, GP for respondents present. Rejoinder submitted copy of which is handed over to learned GP. To come up for arguments on 27.10.2016.



Member

  
Member

3

29.05.2015

Clerk of counsel for the appellant present. Learned counsel for the appellant is stated indisposed. Adjourned to 12.06.2015 for preliminary hearing before S.B.

  
Chairman

4

12.06.2015

Appellant with counsel present. Learned counsel for the appellant argued that the appellant was SST (General) and appointed as AAEO, Orakzai Agency. That vide impugned order dated 20.2.2015 one Asadullah, respondent No. 3, being SST (Science) was transferred and posted against the afore-stated position occupied by the appellant. That the said order of transfer and posting is against the selection criteria for the post of AAEO as respondent No. 3 was neither fulfilling the prerequisites laid down in paras-I, IV and IX of the policy letter dated 6.10.2011 (Annexure-E page-20) nor was entitled to appointment but was appointed as such due to administrative and political pressure and hence the impugned order is a nullity in the eye of law.

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 for 21.9.2015 before S.B.

  
Chairman

21.09.2015

Appellant in person, Mr. Daud Jan, Supdt. alongwith Assistant AG for official respondents No. 1 and 2 and private respondent No. 3 in person present. Requested for adjournment. To come up for written reply/comments on 26.11.2015 before S.B.

  
Chairman



Appellant Deposited  
Security & Process Fee



Form- A  
FORM OF ORDER SHEET

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

Case No. 488/2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	26.05.2015	<p style="text-align: center;">The appeal of Mr. Rehmat Khan presented today by Mr. Khaled Rehman 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	27-5-15	<p style="text-align: center;">This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>29-5-15</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 488 /2015

Rehmat Khan

.....Appellant

Versus

The Govt. and others

.....Respondents

INDEX

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3.	Letter of appreciation by AEO		B	0-7
4.	Re-deployment/detailment order of Respondent No.3	04.08.2010	C	8-18
5.	Impugned transfer order	20.02.2015	D	0-19
6.	Selection Criteria	06.10.2011	E	0-20
7.	Departmental Representation	25.02.2015	F	0-21
8.	Transfer/Posting Policy		G	22-26
9.	Applications of Headmasters		H	27-28
10.	Forwarding letter of AEO	22.04.2015	I	0-29
11.	Wakalat Nama			

Through

*Nal*  
Appellant

*Khaled Rahman*  
Advocate,  
Supreme Court of Pakistan  
3-D, Haroon Mansion  
Khyber Bazar, Peshawar  
Tel: 091-2592458  
Cell # 0345-9337312

Dated: 26 /05/2015

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

**Service Appeal No. 488 /2015**

Rehmat Khan  
SET (General), GMS Bugara, Orakzai Agency.....*Appellant*

**VERSUS**

1. The Additional Chief Secretary FATA,  
FATA Secretariat, Warsak Road, Peshawar.
2. The Director Education (FATA)  
Warsak Road, Peshawar
3. Asadullah,  
SST (Science),  
present Assistant Agency Education Officer  
AEO Office, Orakzai Agency .....*Respondents*

**K.W.P PROVINCE**  
**Service Tribunal**  
Diary No. 533  
Date: 26-5-2015

**SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNALS ACT, 1974 AGAINST THE IMPUGNED TRANSFER ORDER DATED 20.02.2015 WHEREBY APPELLANT WAS UNLAWFULLY TRANSFERRED FROM THE POST OF AAEO, OFFICE OF THE AEO, ORAKZAI AGENCY WHILE RESPONDENT NO.3 WAS ILLEGALLY POSTED IN HIS STEAD AGAINST WHICH APPELLANT PREFERRED DEPARTMENTAL REPRESENTATION ON 25.02.2015 BUT THE SAME WAS NOT DISPOSED OF WITHIN THE STATUTORY PERIOD OF 90 DAYS.**

**PRAYER:**

On acceptance of the instant appeal, the impugned transfer order dated 20.02.2015 may graciously be set aside by posting Respondent No.3 back against his substantive post of SST (Science) and restoring the posting of the appellant as AAEO, Office of the Agency Education Officer, Orakzai Agency.

*Filed to-day*  
*26/5/15.*

Respectfully Sheweth,

Facts giving rise to the present appeal are as under:-

1. That appellant joined the Education Department FATA as SST (General) vide order dated 24.05.1995. Since his appointment, appellant has been performing his duties to the best of his abilities and to the entire satisfaction of his high-ups. At the moment appellant has 20 years' service at his credit.
2. That having sufficient experience in the field of administration, appellant was posted as AAEO in the office of Agency Education Officer, Orakzai Agency where appellant was efficiently discharging his official liabilities and the Agency Education Officer as well as the Political Agent, Orakzai Agency have appreciated the efforts of appellant in the field of Education during the period of crises. (Letters of appreciation *Annex:-A&B*).
3. That Respondent No.3 being SST (Science) was earlier posted at GHS Dran Sheikhan, Orakzai Agency but due to the outbreak of law & order situation prevailing in the area, the School was closed down way back in the year 2009 and is still close. Consequently, the Respondent No.3 was re-deployed/detailed at GHS Bazidkhel, Orakzai Agency vide order dated 04.08.2010 (*Annex:-C*) but till the issuance of the impugned order Respondent No.3 remained absent, however, being a Drawing and Disbursing Officer, managed the drawl of his salaries due to his influence, which fact may be verified from the Attendance Register of the School as well as from the Teachers in the subject School.
4. That Respondent No.3 managed to procure the impugned transfer order dated 20.02.2015 (*Annex:-D*) in violation of the prescribed selection criteria evolved by the Education Directorate FATA vide



Circular dated 06.10.2011 (*Annex:-E*), by exercising administrative pressure through his close relative who is wielding influence in the lounges of power in the FATA Directorate whereby Respondent No.3 who is not even otherwise fit for the posting, was transferred against the post of AAEO vice the appellant while appellant was posted against the vacant post of SST (General) at GHS Tuti Bagh but re-adjusted at GMS Bugara, Orakzai Agency.

5. That being aggrieved of the impugned transfer order, appellant preferred a departmental Representation (*Annex:-F*) on 25.02.2015 but the same was not disposed of within the statutory period of 90 days, hence files this appeal inter-alia on the following grounds:-

**Grounds:**

- A. That Respondents have not treated appellant in accordance with law, rules and policy on subject and acted in violation of Article 4 of the Constitution of Islamic Republic of Pakistan, 1973 and unlawfully issued the impugned order, which is unjust, unfair and hence not sustainable in the eye of law.
- B. That under the Transfer/Posting Policy (*Annex:-G*) a transfer can be effected in the public interest or in exigency of service but the impugned order has been issued not only in oblivion of the two but rather has been issued under the administrative influence which is thus illegal, unwarranted and hence not sustainable.
- C. That a detailed and full-fledged criteria for transfer of AAEOs has been formulated by the Directorate of Education FATA whereby the concerned the concerned Agency Education Officer shall forward a Panel of at least three SSTs in order of seniority but interestingly Respondent No.3 was transferred to the subject post without following or adhering to the selection criteria, which speaks volumes that how

the impugned transfer order was procured for the choice posting of Respondent No.3. Since the impugned order is in utter disregard the criteria *ibid*, therefore, the order is void abinitio and hence not sustainable as *where the law requires a thing to be done in a particular then it must be done in that manner*. While issuing the impugned transfer order, seniors were ignored in violation of the criteria.

- D. That Respondent No.3 has also remained absent ever since his detailment order in the year 2010 but his influential position may be gauged from the fact that till date he has been in the receipt of salaries with no action of discipline for absence. A detailed inquiry in this respect needs to be conducted for the purpose of legal action and recovery of salaries received by Respondent No.3 being a DDO.
- E. That the criteria *ibid*, specifically provides that *due to acute shortage of Science Teachers in High School SET (Science) will not be considered for the post of AAEO* but inspite of the same the impugned transfer order was unlawfully procured whereby Respondent No.3 was transferred to the post in clear violation of the selection criteria. Moreover, requests are being poured by the Headmasters/Principals for the transfer of SST (Science) Teachers to Schools due to dearth of such teachers in the Schools as is evident from the applications (*Annex:-H*) and the forwarding letter (*Annex:-I*).
- F. That the immediate boss of the appellant was Agency Education Officer concerned and all transfers of the AAEOs posted in his Office are initiated at his instance but since the order was issued under the administrative influence, therefore, the concerned Agency Education Officer concerned was not taken into confidence before issuance of the impugned order which is against the ethics of the good governance, efficiency of service.

- G. That while issuing the impugned order, the Judgments of the Hon'ble Supreme Court of Pakistan on the subject matter have been offended.
- H. That appellant would like to offer some other grounds during the course of arguments.

It is, therefore, humbly prayed that the instant appeal may graciously be accepted as prayed for above.

Any other relief as deemed appropriate in the circumstances of case not specifically asked for, may also be granted to appellant.

Through

*Nal's*  
Appellant

*Khaled Rahman*  
Khaled Rahman,  
Advocate, Peshawar

Dated: 26 /05/2015

OFFICE OF THE POLITICAL AGENT  
ORAKZAI AGENCY AT HANGU

No 1166-70/C/PA  
Dated: 24 /June/2011

6

To


*Amir A*

The Director Education FATA,  
FATA Sectt: Peshawar

**Subject: LETTER OF APPRECIATION**

In the wake of the military operation in Orakzai Agency, the greatest challenge faced by Political Administration was the rehabilitation of the socio economic sectors in general and the education sector in particular. In this regard, all out efforts based on war-footings were launched by all concerned. It will not be out of place to mention here the hard work put in by Mr. Mohammad Din Khan, Agency Education Officer and Mr. Rehamt Khan, Assistant Agency Education Officer. All the schools (Boys & Girls) in all the cleared areas of Orakzai Agency were opened, the presence of staff in these schools was ensured and by paying regular visits to the schools, the education system was brought back on track. The undersigned acknowledges their efforts and also give them cash rewards of Rs. 5000/- each for their professional excellence .

The aim of the letter is also to recognise their services at your level and also bring on record the services rendered by them in the uplift of educational sector of Orakzai Agency.

  
**POLITICAL AGENT,  
ORAKZAI AGENCY.**

Copy forwarded to the:-

1. Additional Chief Secretary FATA, FATA Sectt: Peshawar
2. Commissioner Kohat Division, Kohat
3. Secretary Administration & Coordination, FATA Sectt: Peshawar
4. Officers concerned.

  
**POLITICAL AGENT,  
ORAKZAI AGENCY.**

A

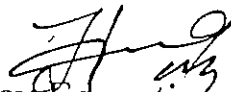
TO WHOM IT MAY CONCERN.

7

A/N/2/B

It is certified that Mr. Rehmat Khan Assistant Agency  
Education Officer is an honest duty full & punctual.

The undersigned is satisfied from his work assigned to him.

 5/18  
Agency Education Officer  
Orakzai Agency at Hangu  
Agency Education Officer  
Orakzai Agency at Hangu

ATE

B

## OFFICE OF THE AGENCY EDUCATION OFFICER, ORAKZAI AGENCY AT HANGU

Statement Showing Non functional Schools teachers Deployed to the school mentioned against each in r/o the Circle of Mr. Rehmat Khan AAEO & Mr. Daulat Shah AAEO of Orakzai Agency

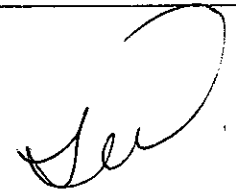
S#	Name of Teacher	Desig:	Name of Institution	Deployed to:
1.	Faqeer Khan	TT	GHS Swaro Kot	GPS Zar Geri Hangu
2.	Zarin Shah	PTC	GPS Chinar	GPS Zar Geri Hangu
3.	Fazal mir	PTc	GPS Chinar	GPS Zar Geri Hangu
4.	Muhammad Yaseen	PTC	GPS Mazeed Kali	GPS Zar Geri Hangu
5.	Said Aziz	PTC	GPS Sarki Khel	GPS Zar Geri Hangu
6.	Maweez Khan	TT	GPS Yousaf Khel	GPS Zar Geri Hangu
7.	Islam Akbar	TT	GPS Chaper Ali Khel	GPS Zanki Banda Hangu
8.	Nazir Bad Shah	PTC	GPS Ghutaq Issa Khel	GPS Zanki Banda Hangu
9.	Naqeeb Ullah	PTC	GPS Oni	GPS Zanki Banda Hangu
10.	Muhammad Irshad	TT	GPS Khadizai No:4	GPS Warsta No.2 Hangu
11.	Bad Shah Khan	PTc	GPS Kagni	GPS Warsta No.2 Hangu
12.	Khaista Akbar	TT	GPS Kandi Mishli	GPS Warsta No.2 Hangu
13.	Bismellah	PTC	GPS Musa Mela	GPS Warsta No.2 Hangu
14.	Muhammad Azam	PTc	GPS tezi	GPS Warsta No.2 Hangu
15.	Nooral Ahad	PTC	GPS Koz Keruna	GPS Warsta No.2 Hangu
16.	Shahid Ullah	PTC	GHS Swaro Kot	GPS Warsta No.1 Hangu
17.	M.Sadiq	PTC	GPS Kago Kamar	GPS Warsta No.1 Hangu
18.	Muhammad Ghani	PTC	GPS koot Ali Khel	GPS Warsta No.1 Hangu
19.	Said Rehman	TT	GPS Kago Kamar	GPS Warsta No.1 Hangu
20.	Khaista Jan	PTc	GPS Khawas Khel	GPS Warsta No.1 Hangu
21.	Said Janan	TT	GPS Kohi Kali	GPS Warsta No.1 Hangu
22.	Raiat Khan	PTc	GPS Mopati	GPS Warsta No.1 Hangu
23.	Hameed shah	PTC	GPS Star Kali	GPS Warsta No.1 Hangu
24.	Azmat Shah	PTC	GPS Ali Khan Garhi	GPS Warsta Hangu
25.	Javid Akhtar	PTc	GPS Goda	GPS Warsta Hangu
26.	Mian Khan	PTC	GPS Saray Garay	GPS Wach Bazar, Hangu
27.	Mian Khan	PTC	GPS Shaker Tangi	GPS Wach Bazar Hangu
28.	Abdul Wahab	TT	GPS Laghar Darrah	GPS Wach Bazar Hangu
29.	Ahmed Khan	PTC	GPS Navi Mela	GPS Wach Bazar Hangu
30.	Ashab Gul PTC	PTC	GMS Baghnak	GPS Wach Bazar Hangu
31.	Gul Karim	PTC	GPS Bari Khel	GPS Wach Bazar Hangu
32.	Khan Wazir	PTC	GPS Nari Garhi	GPS Turki Banda Hangu
33.	Ghalib Jan	PTC	GPS Nari Garhi	GPS Turki Banda Hangu
34.	Sher Akbar	TT	GPS Nari Garhi	GPS Turki Banda Hangu
35.	Painda Khan	PTC	GPS Yousaf Khel	GPS Turki Banda Hangu
36.	Muhammad Shoaib	PTc	GPS Yousaf Khel	GPS Turki Banda Hangu
37.	Rais Akbar	PTc	GPS Zakhtan	GPS Turki Banda Hangu
38.	Haji Akbar	TT	GPS Baghnak	GPS Spin Khawri Hangu
39.	Naseeb Rehman	PTc	GPS Gul Seri	GPS Spin Khawri Hangu
40.	Irshad Khan	PTC	GPS Kagni	GPS Spin Khawri Hangu
41.	Yaqeen Muhammad	PTC	GPS Karapa	GPS Spin Khawri Hangu
42.	Saifur Rehman	PTC	GPS Khadizai No:2	GPS Spin Khawri Hangu
43.	Israfeel Khan	PTc	GPS Khadizai No:3	GPS Spin Khawri Hangu
44.	Mir Asghar	PTc	GPS Tali Akhel	GPS Spin Khawri Hangu
45.	Muhammad Sahib	TT	GHS Manz Garhi	GPS Shinko Banaa Hangu
46.	Radi Gul	TT	GPS Jalo	GPS Shinko Banaa Hangu

ANNEX C

8

C

S#	Name of Teacher	Desig:	Name of Institution	Deployed to:
47.	Muhammad Riaz	PTC	Star Sam Mamozai	GPS Shinko Banao Hangu
48.	Muhammad Umar	PTC	GPS Ugda Pakha	GPS Shinko Banao Hangu
49.	Abdul Hakim	PTC	GPS Sama Mamozai	GPS Sheikhano Banda Hangu
50.	Abdul Shakoor	PTC	GPS Sama Mamozai	GPS Sheikhano Banda Hangu
51.	Muhammad Suliman	TT	GPS Sama Mamozai	GPS Sheikhano Banda Hangu
52.	Qadeem Khan	TT	GPS Zakhtan	GPS Sheikhano Banda Hangu
53.	Muhammad Bahar	TT	GPS Yousaf Khel	GPS Sheikhano Banda Hangu
54.	Ghazi Gul	PTC	GPS Zakhtan	GPS Sheikhano Banda Hangu
55.	Shahid Akbar	PTC	GPS Alfa Khel	GPS Shana Wori Hangu
56.	Muhib Ullah	TT	GPS Alfa Khel	GPS Shana Wori Hangu
57.	Zauta Khan	PTC	GPS Badan	GPS Shana Wori Hangu
58.	Muhammad Ayaz	PTC	GPS Badan	GPS Shana Wori Hangu
59.	Hamayon Khan	PTC	GPS Chaper Ali Khel	GPS Shana Wori Hangu
60.	Salah Uddin	PTC	GPS Chaper Ali Khel	GPS Shana Wori Hangu
61.	Muhammad Satar	PTC	GPS Jalo	GPS Shana Wori Hangu
62.	Hafeez Rehman	PTC	GPS Karbugha	GPS Shana Wori Hangu
63.	Muhammad Kamal	PTC	GPS Khadizai NO:1	GPS Shana Wori Hangu
64.	Fazal Jalil	PTC	GMS Bugara Mishfi	GPS Shahoo Khel, Hangu
65.	Mohammad Saeed	TT	GPS Shaker Tangi	GPS Shahoo Khel, Hangu
66.	Muhammad Ayaz	PTC	GPS Navi Mela	GPS Shahoo Khel, Hangu
67.	Muhammad Shoab	PTC	GPS Lal Baz Garay	GPS Shahoo Khel, Hangu
68.	Mohammad Ashraf	TT	GMS Kasha	GPS Shahoo Khel, Hangu
69.	Hikmat Khan	TT	GPS Seri Mela	GPS Shahoo Khel, Hangu
70.	Iftikhar Ali	PTC	GPS Gall	GPS Saidano banda Hangu
71.	Javid Askar	PTC	GPS Gall	GPS Saidano banda Hangu
72.	Sirab Ali	TT	GPS Gall	GPS Saidano banda Hangu
73.	Himat Khan	PTC	GPS Toor Smat	GPS Raison Hangu
74.	Rais Khan	PTC	GPS Gandi Tail	GPS Raison Hangu
75.	Najib Ali	TT	GPS Beropi	GPS Raison Hangu
76.	Habib Rehman	PTC	GPS Mazari Garhi	GPS Raison Hangu
77.	Shaheen Rehman	PTC	GPS Oat Mela	GPS Raison Hangu
78.	Ijaz hussain	TT	GPS Ugda Pakha	GPS Raison Hangu
79.	Zarmir Ali	PTC	GPS Sra Khawa	GPS Raison Hangu
80.	Waris Ali	PTC	GPS Sra Khawa	GPS Raison Hangu
81.	Munawar Khan	PTC	GPS Rambic Salai	GPS No.4 Sangirh Road
82.	Zar Jamal	PTC	GPS Khee Kada No2	GPS No.4 Hangu
83.	Mohammad Ismail	PTC	GPS Ster Killi Sheikhan	GPS No.4 Hangu
84.	Zafar Ali	PTC	GPS Injerki	GPS No.4 Hangu
85.	Saqib Rehman	PTC	GPS Punjam Ali Khel	GPS No.4 Hangu
86.	Kefayat Ullah	PTC	GPS Pershan Tang	GPS No.4 Hangu
87.	Aziz Ahmad	PTC	GPS Balazawi	GPS No.4 Hangu
88.	Muhib ullah	PTC	GPS Chino Mamozai	GPS No.4 Hangu
89.	Um,ar Khan	PTC	GPS Mir,Kalam Khel	GPS No.4 Hangu
90.	Muhammad Anwar	PTC	GPS Adu garhi	GPS No.3 Hnagu
91.	Oner Gul	PTC	GPS Ghundaki	GPS No.3 Hnagu
92.	Fazi Ur Rehman	TT	GPS Ghundaki	GPS No.3 Hnagu
93.	Jalat Khan	PTC	GPS Rego	GPS No.3 Hangu
94.	Khadi rehman	PTC	GPS Rego	GPS No.3 Hangu
95.	Muhammad Rafiq	PTC	GPS Karbugha	GPS No.3 Hangu



#	Name of Teacher	Desig:	Name of Institution	Deployed to:
96.	Mukhtiar Khan	PTC	GPS koot Ali Khel	GPS No.3 Hangu
97.	Ali Hanssan	PTC	GPS Taropi	GPS No.2 Hnagu
98.	Taj Muhammad	PTC	GMS Zanka Khel	GPS No.2 Hangu
99.	Fazal khaliq	TT	GPS Malanag Garhi	GPS No.2 Hangu
100.	Fazal Amin	PTC	GPS Nareek No:2	GPS No.2 Hangu
101.	Roshnail Khan	PTC	GHS Manz Garhi	GPS No.1 Hnagu
102.	Raqoob Khan	PTC	GPS Adu garhi	GPS No.1 Hnagu
103.	Muhammad Ayub	TT	GPS Adu garhi	GPS No.1 Hnagu
104.	Afsar Khan	PTC	GPS Krunchki	GPS No.1 Hangu
105.	Akbar Zaman	TT	GPS Kunj Kali	GPS No.1 Hangu
106.	Muhammad Farooq	TT	GPS Krunchki	GPS No.1 Hangu
107.	Ajab Gul	PTC	GPS Lalo Garhi	GPS No.1 Hangu
108.	Muhammad Saleem	PTC	GPS Malanag Garhi	GPS No.1 Hangu
109.	Muhammad Sajid	PTC	GPS Mazari Garhi	GPS No.1 Hangu
110.	Aurangzeb	TT	GPS Mazeed Kali	GPS No.1 Hangu
111.	Muhammad Akbar	PTC	GPS Nareek No:1	GPS No.1 Hangu
112.	Sajid Habib	PTC	Arkho Kali	GPS Navi Kali Hangu
113.	Adam Khan	PTC	GPS Karapa	GPS Mula Koor Hangu
114.	Muhammad Shafiq	PTC	GPS Mopati	GPS Muia Koor Hangu
115.	Muhammad Saeed	TT	GPS Nareek No:3	GPS Mula Koor Hangu
116.	Khana Jan	PTC	GPS Oat Mela	GPS Mula Koor Hangu
117.	Shamshad Shah	TT	GMS Zanka Khel	GPS Mula Khel Kali Hangu
118.	M.Shafiq	PTC	GPS Dresuti	GPS Mula Khel Kali Hangu
119.	Khalil Ahmad	PTC	GPS Sraka AKhel	GPS Mir Bak Hangu
120.	Mujeeb Ullah	TT	GPS Sraka AKhel	GPS Mir Bak Hangu
121.	Khana Din	PTC	GPS Lalo Garhi	GPS Mardo Khel Banda Hangu
122.	Muhammad Alam	TT	GPS Ghiljo	GPS Mardo Khel Banda Hangu
123.	Ishfaq Ali	PTC	GPS Daper	GPS Mardo Khel Banda Hangu
124.	Muhammad Anwar	PTC	GHS Dran Sheikhan	GPS Mardo Khel Banda Hangu
125.	Muhammad Ajmal	TT	GPS Babera Laki	GPS Mardo Khel Banda Hangu
126.	Arbab Khan	TT	GPS Babera Laki	GPS Mamozi Banda Hangu
127.	Ishfaq	PTC	GHS Saifal Dara	GPS Mamozi Banda Hangu
128.	Khalil Ur Rehman	PTC	GPS Musa Mela	GPS Mamozi Banda Hangu
129.	Sharin Hassan	PTC	GPS Daper	GPS Mamozi Banda Hangu
130.	Taj Muhammad	PTC	GPS Ghutak	GPS Mamozi Banda Hangu
131.	Muhammad farooq	PTC	Star Sam Mamozi	GPS Mamozi Banda Hangu
132.	Misal Khan	PTC	GPS Karapa Samana	GPS Malayano Killi Hangu
133.	Faisal Mumtaz	PTC	GPS Beropi	GPS Lakhti Banda No.2 Hangu
134.	Amjad Khan	PTC	GPS Beropi	GPS Lakhti Banda No.2 Hangu
135.	M.Farid	PTC	GPS Arghunja	GPS Lakhti Banda Hangu
136.	Abdul Haleem	PTC	GPS Arghunja	GPS Lakhti Banda Hangu
137.	Mukaram Khan	TT	Arkho Kali	GPS Lakhti Banda Hangu
138.	Mahmood Khalid	PTC	GPS Baza	GPS Lakhti Banda Hangu
139.	Adil Khan	TT	GPS Baza	GPS Lakhti Banda Hangu
140.	Surab Ali	PTC	GPS Balazawi	GPS Lakhti Banda Hangu
141.	Khial bat Khan	PTC	GPS Kohi Kali	GPS Lakhti Banda Hangu
142.	Lal Akbar	PTC	GPS kool	GPS Lakhti Banda Hangu
143.	Muhammad Rehman	PTC	GPS Nareek No:2	GPS Lakhti Banda Hangu
144.	Atiq Rehman	PTC	GPS Punjam Ali Khel	GPS Lakhti Banda Hangu

ATC



S#	Name of Teacher	Desig:	Name of Institution	Deployed to:
145.	Dawar Khan	PTC	GPS Lal Baz Garay	GPS Kurmiwalo Killi Hangu
146.	Fazal Akber	PTC	GPS Zanda	GPS Kurmiwalo Killi Hangu
147.	Eid Muhammad	PTC	GMS Ghuz Garh	GPS Kurmiwalo Killi Hangu
148.	Maqbool Shah	PTC	GPS Saray Garay	GPS Kurmiwalo Killi Hangu
149.	Khaild muhammad	PTC	Arkho Kali	GPS Kurmiwalo Kali Hangu
150.	Shakir Ullah	TT	GPS Goda	GPS Kurmiwalo Kali Hangu
151.	Zar Muhammad	PTC	GPS Gul Seri	GPS Kurmiwalo Kali Hangu
152.	Bahadar Zaman	TT	GHS Drodar	GPS Kurmiwalo Kali Hangu
153.	Shuja Alam	PTC	GPS Taghni	GPS Kotki Hangu
154.	Momin Shah	PTC	GPS Taghni	GPS Kotki Hangu
155.	Muhammad Aslam	PTC	GPS Taropi	GPS Kotki Hangu
156.	Aziz Rehman	TT	GPS Taropi	GPS Kotki Hangu
157.	Habib Nawaz	PTC	GPS Ugda Pakha	GPS Kotki Hangu
158.	Muhammad Ayub	TT	GPS Dago Takhtak	GPS Kotki Bala Hangu
159.	Abdul Qayum	TT	GPS kool	GPS Kharasha Banda Hangu
160.	Inayat Shah	PTC	GMS Zanka Khel	GPS Kharasha Banda Hangu
161.	S.Muzamil Hussain	PTC	GPS Oat Mela	GPS Kharasha Banda Hangu
162.	Khaistan Gul	TT	GMS Ghuz Garh	GPS Kharasha Banda Hangu
163.	Riazullah	CT	GMS Bugara Mishti	GPS Kharasha Banda Hangu
164.	Muhammad Ajmir	TT	GPS Inzar Akhpa	GPS Kharasha Banda Hangu
165.	Muhammad Sadiq	PTC	GPS Inzar Akhpa	GPS Kharasha Banda Hangu
166.	Shafiq Rehman	PTC	GPS Khee Kada No1	GPS Kharasha Banda Hangu
167.	Muhammad Ibrahim	TT	GHS Dran Sheikhan	GPS Kas Banda Hangu
168.	Tajmeen Khan	PTC	GPS Alfa Khel	GPS Kas Banda Hangu
169.	M.Asiam	PTC	GPS Bari Khel	GPS Jadeed Banda Hangu
170.	Asad Ullah	PTC	GPS Kandi Mishti	GPS Ira Banda Hangu
171.	Khial Ajab Khan	TT	GPS koot Ali Khel	GPS Ira Banda Hangu
172.	Sbil Muhammad	PTC	GPS Malanag Garhi	GPS Ira Banda Hangu
173.	Abdullah	PTC	GPS Injerki	GPS Ira Banda Hangu
174.	Fazal Qayum	TT	GPS Oni	GPS Gharibo Kali Hangu
175.	Said Rasool	TT	GPS Sarki Khel	GPS Gharibo Kali Hangu
176.	Abdul Qayum	TT	GPS Badan	GPS Gharibo Kali Hangu
177.	Samandar Khan	PTC	GPS kotak Ali Khel	GPS Duri Banda Hangu
178.	Muhib Rehman	TT	GHS Ghiljo	GPS Darband Hangu
179.	Zamir Gul	PTC	GMS Yakho Kandoq	GPS Darband Hangu
180.	Walayat Khan	PTC	GPS Badama	GPS Darband Hangu
181.	M.Sharif	TT	GPS Badama	GPS Darband Hangu
182.	Amiir Rehman	PTC	GPS Khadizai NO:2	GPS Darband Hangu
183.	Muhammad Sultan	TT	GPS Khadizai NO:3	GPS Darband Hangu
184.	Akbar Gul	PTC	GPS Jalo	GPS Darband Hangu
185.	Alif Rehman	TT	GPS Jaba Kada	GPS Charbala Hangu
186.	Khaistar Akber	TT	GPS Kandi Mishti	GPS Charbala Hangu
187.	Abdul Mabood	TT	GPS Lalo Garhi	GPS Chapri Naryab Hangu
188.	Lal Gul	PTC	GPS Madudar	GPS Chaperi Hangu
189.	M.Yaqoob	PTC	GPS Mazeed Kali	GPS Balyamina Hangu
190.	Muhammad Karim	PTC	GPS Khee Kada No1	GPS Balyamina Hangu
191.	Hikmat Khan	PTC	GMS Starā Kada	GPS Balyamina Hangu
192.	Noor Ullah	TT	GPS Musa Mela	GPS Balyamina Hangu
193.	Sultan Bad SHah	PTC	GPS Ali Khan Garhi	GPS Bagato Hangu

S#	Name of Teacher	Desig:	Name of Institution	Deployed to:
194.	Moti Ur Rehman	PTC	GPS Jaba Kada	GPS Bagato Hangu
195.	Rahim Bad Shah	PTC	GPS Kandi Mishli	GPS Bagato Hangu
196.	Muhammad Ashraf	TT	GPS Ibrchimo	GPS Bagato Hangu
197.	Munawar Khan	PTC	GPS Garhi Mishli	GPS Bagato Hangu
198.	Khalil Ahmad	PTC	GHS Dradar	GPS Babu tang Hangu
199.	Asad ullah	TT	GPS Ali Khan Garhi	GPS Babu tang Hangu
200.	Umar Shah	PTC	GPS Kunj Kali	GPS Babu tang Hangu
201.	Eid Muhammad	PTC	GPS Tali Akhel	GPS Babu tang Hangu
202.	Jafer Khan	TT	GPS Khangar Boor	GPS Babo Tang Hangu
203.	Shabir Ahmed	AT	GMS Bugara Mishli	GPS Baber Mela Hangu
204.	Muhammad Khan	PTC	GPS Nareek No:3	GPS Abdur Rehman Banda Hangu
205.	Abdur Rahim	TT	GPS Nareek No:4	GPS Abdur Rehman Banda Hangu
206.	Khial Man Shah	A.T	GMS Yakho Kandoq	GMS Zargeri Hangu
207.	Nizam Udin	A.T	GMS Baghnak	GMS Zargeri Hangu
208.	NasrullB86:D98ah	D.M.	GHS Injawaer	GMS Warsta Road Hnagu
209.	Muhammad Umer	Qari	GHS Dran Sheikhan	GMS Warsta Road Hnagu
210.	Asadullah Khan	PET	GMS Bugara Mishli	GMS Wach Bazar Hangu
211.	Asif Malik	CT	GMS Kasha	GMS Wach Bazar Hangu
212.	Abdul Laliif	A.T	GHS Manz Garhi	GMS Wach Bazar Hangu
213.	Abdool Wadood	Qari	GHS Spidar	GMS Wach Bazar Hangu
214.	Abdul Wahab	TT	GMS Bugara Mishli	GMS Shahoo Wam Hangu
215.	Abdur Rob	AT	GMS Ghuz Garh	GMS Shahoo Wam Hangu
216.	Nazir Gul	C.T	GMS Siara Kada	GMS Raison Hangu
217.	Muhammad Rehman	C.T	GHS Manz Garhi	GMS Raison Hangu
218.	Hanif Jan	C.T	GHS Spidar	GMS Raison Hangu
219.	Janat Khan	CT	GMS Bugara Mishli	GMS No.3 Hangu
220.	Said Zamir	A.T	GMS Siara Kada	GMS Naryab Hangu
221.	Muzamil Shah	A.T	GHS Ghiljo	GMS Mohammad Khwaja Hangu
222.	Ghazi Rehman	C.T	GMS Baghnak	GMS Mir Bak Hangu
223.	Zahir Jan	C.T	GHS Ghiljo	GMS Mir Bak Hangu
224.	Irshad Khan	PET	GMS Yakho Kandoq	GMS Mir Bak Hangu
225.	Samar Gul Qari	Qari	GHS Dradar	GMS Mir Bak Hangu
226.	Imran Khan	PTc	GPS Spidar	GMS Mir Bak Hangu
227.	Raj Wali Khan	CT	GMS Kasha	GMS Mir Bak Hangu
228.	Abdul Malik	DM	GMS Kasha	GMS Mir Bak Hangu
229.	Hashim Gul	D.M	GMS Yakho Kandoq	GMS Khazini Banada Hangu
230.	Pir Gul	Qari	GHS Manz Garhi	GMS Khazina
231.	Fazal karim	SET	GHS Swaro Kot	GMS Darband Hangu
232.	Muhammad Rahim	Qari	GHS Swaro Kot	GMS Darband Hangu
233.	Masood	Qari	GHS Swaro Kot	GMS Darband Hangu
234.	Muhammad Saleh	PEI	GHS Swaro Kot	GMS Darband Hangu
235.	M.Tariq	D.M	GHS Spidar	GMS Darband Hangu
236.	Rehman Gul	Qari	GHS Spidar	GMS Darband Hangu
237.	Hameed Khan	C.T	GMS Zanka Khel	GMS Darband Hangu
238.	Shah Muhammad	PET	GMS Zanka Khel	GMS Darband Hangu
239.	Saif Rehman	PEI	GHS Spidar	GMS Bagato Hangu
240.	Muhammad Yousaf	C.T	GMS Yakho Kandoq	GMS Bagato Hangu
241.	Rashid Muhammad	C.T	GMS Toor Kanri	GMS Bagato Hangu
242.	Kefayat Ullah	C.T	GHS Swaro Kot	GMS Bagato Hangu

S#	Name of Teacher	Desig:	Name of Institution	Deployed to:
243.	Muhammad Haleem	PET	GHS Dradar	GMS Bagato Hangu
244.	Mast Ali Khan	D.M	GHS Swaro Kot	GHS Warsta Road
245.	Abdul Hameed	SET	GMS Stara Kada	GHS Shana Wori Hangu
246.	Mian Din	D.M	GHS Manz Garhi	GHS Shana Wori Hangu
247.	Amin Bad SHah	A.T	GHS Swaro Kot	GHS Shana Wori Hangu
248.	Nosher Wan	A.T	GHS Spidar	GHS Shana Wori Hangu
249.	Muhammad Ali	C.T	GMS Zanka Khel	GHS Shana Wori Hangu
250.	Rafi Ullah	A.T	GHS Saifal Dara	GHS Shahoo Khel Hangu
251.	Salim Khan	PET	GHS Saifal Dara	GHS Shahoo Khel Hangu
252.	Aziz Rahman	PTC	GPS Shaker Tangi	GHS Shahoo Hangu
253.	Hussain Ahmed	AT	GMS Kasha	GHS Shahoo Hangu
254.	Munir Khan	C.T	GHS Ghiljo	GHS Shaho Khel Hangu
255.	Muhammad Saeed	PET	GHS Manz Garhi	GHS Shaho Khel Hangu
256.	Muhammad Hayat	CT	GMS Kasha	GHS Shaho Distt. Hangu
257.	Tilawat Shah	C.T	GHS Spidar	GHS No.3 Hnagu
258.	Muhammad Rahim	C.T	GHS Saifal Dara	GHS No.3 Hnagu
259.	Janat Khan	C.T	GHS Saifal Dara	GHS No.3 Hnagu
260.	Habib Rehman	C.T	GHS Ghiljo	GHS No.3 Hnagu
261.	Aziz Rehman	C.T	GHS Manz Garhi	GHS No.3 Hnagu
262.	Mujeeb Rehman	C.T	GMS Baghnak	GHS No.3 Hangu
263.	Ayub Khan	C.T	GHS Manz Garhi	GHS No.3 Hangu
264.	Shakeel Ahmad	C.T	GHS Swaro Kot	GHS No.3 Hangu
265.	Muhammad Munir	SET	GMS Zanka Khel	GHS No.2 Hangu
266.	Aman Ullah	C.T	GMS Stara Kada	GHS No.2 Hangu
267.	Abdur Reziq	SET	GHS Saifal Dara	GHS No.2 Hangu
268.	Fazal Karim	C.T	GHS Saifal Dara	GHS No.2 Hangu
269.	Muhammad Kamal	C.T	GMS Toor Kanri	GHS No.2 Hangu
270.	Ali Haider	PET	GMS Stara Kada	GHS No.2 Hangu
271.	Muhammad Yar	SET	GHS Ghiljo	GHS No.2 Hangu
272.	Rafi Ullah	SET	GHS Swaro Kot	GHS No.2 Hangu
273.	Muslim Bad Shah	D.M	GMS Zanka Khel	GHS No.1 Hangu
274.	Faiz ullah	SET	GHS Manz Garhi	GHS No.1 Hangu
275.	Muslim Khan	PTC	GHS Swaro Kot	GHS No.1 Hangu
276.	Sarwar Shah	C.T	GHS Saifal Dara	GHS No.1 Hangu
277.	Alam Khan	C.T	GHS Saifal Dara	GHS No.1 Hangu
278.	Najeeb Rehman	Qari	GHS Manz Garhi	GHS No.1 Hangu
279.	Muhammad Amin	C.T	GHS Swaro Kot	GHS No.1 Hangu
280.	Noor Hassan	SET	GHS Spidar	GHS No.1 Hangu
281.	Asad Rahim	SET	GHS Spidar	GHS No.1 Hangu
282.	Fateh Khan	SET	GHS Swaro Kot	GHS No.1 Hangu
283.	Fazal Raziq	PTC	GMS Kasha	GHS No.1 Hangu
284.	Muhammad Umer	PTC	GPS Koz Koruna	GHS No.03 Hangu
285.	Muhammad Nabi	AT	GHS Dran Sheikhan	GHS No.03 Hangu
286.	Abdur Rehman	IT	GHS Avi Mela	GHS No.03 Hangu
287.	Muhammad Sharif	DM	GMS Bugara Mishti	GHS No.02 Hangu
288.	Wahidullah	CT	GMS Bugara Mishti	GHS No.02 Hangu
289.	Muhamma Aslam	C.T	GMS Yakho Kandoq	GHS Naryab Hangu
290.	Raqibullah	TT	GPS Dubandi	GHS Bagato Hangu
291.	Zial Haq	H/M	GHS Spidar	Office duty

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S#	Name of Teacher	Desig:	Name of Institution	Deployed to
292.	Isal Gul	H/M	GHS Saifal Dara	Office duty
293.	Abdul Khalid	H/M	GHS Manz Garhi	Office duty
294.	Muhammad Hakim	TT	GPS Nazino Sheikhan	GPS Umerzai Sheikhan
295.	Noor Karim	PTC	GPS Damber Lasti	GPS Umerzai Sheikhan
296.	Haji Amir Rahman	TT	GPS Khawaja Khizar	GPS Syed Jamal Killi
297.	Ahmed Bad Shah	PTC	GPS Zanda	GPS Swab Gul Killi
298.	Hassanullah	PTC	GPS Taghi Killi	GPS Swab Gul Killi
299.	Hamid Khan	CT	GMS Zanka Khel	GPS Sultanzai
300.	Seen Akber	PTC	GPS Mulla Koor	GPS Sultanzai
301.	Shah Jehan	TT	GPS Safri Utman Khel	GPS Sultanzai
302.	Mohammad Shafiq	PTC	GPS Nazino Sheikhan	GPS Spin Begi
303.	Muazam Ali	PTC	GPS Laghar Darrah	GPS Sharo Dogula
304.	Basharat Hussain	PTC	GPS Sultanzai	GPS Shamer
305.	Abdullah	TT	GPS Rambic Salai	GPS Sawab Gul Killi
306.	Rahim Gul	PTC	GPS Rambic Salai	GPS Sawab Gul Killi
307.	Muhammad Sarwar	PTC	GPS Nazino Sheikhan	GPS Sarabi Garhi
308.	Qabil Din	PTC	GPS Garhi Mishfi	GPS Sangra Mishfi
309.	Yasin Raza	PTC	GPS Dana Khawala	GPS Ooti
310.	Ahmed Hussain	PTC	GPS Oblan	GPS Oosi
311.	Muhammad Janan	TT	GPS Garhi Mishfi	GPS Mishfi Bazar
312.	Qabeel Muhammad	PTC	GPS Ghiljo	GPS Mishfi Bazar
313.	Wajid Muhammad	PTC	GPS Krunchki	GPS Mishfi Bazar
314.	Sabir Ali	PTC	GPS Dago Takhtak	GPS Mirako Payan
315.	Hussain Jafer	PTC	GPS Dago Takhtak	GPS Mirako Payan
316.	Abdur Rashid	TT	GPS Ster Killi Sheikhan	GPS Mir Mela Sheikhan
317.	Noor Hakim	PTC	GPS Khee Kada No2	GPS Mir Ghara
318.	Shah Zad Mir	TT	GPS Garhi Mishfi	GPS Mir Ghara
319.	Hashim Khan	PET	GMS Baghnak	GPS Mir Ghara
320.	Abbas Khan	PTC	GPS Seri Mela	GPS Mian Khel Mela
321.	Nazir Ajab Khan	PTC	GPS Taghi Killi	GPS Mian Khan Chapper
322.	Hayat Bad Shah	TT	GPS Khee Kada No1	GPS Mian Khan Chapper
323.	Shamsur Rehman	TT	GPS Karapa Samana	GPS Mian Khan Chapper
324.	Rahim Gul	PTC	GPS Kohi Kali	GPS Mian Khan Chaper
325.	Zarin Man Shah	PTC	GPS Madudar	GPS mian Khan Chaper
326.	Noor Hakim Khan	SET/SST(A)	GMS Toor Kanri	GPS Melo Sar
327.	Ismail Khan	TT	GPS Kata Kanri	GPS Melo Sar
328.	Rizwan Khan	PTC	GPS Oblan	GPS Melo Sar
329.	Abdul Khaliq	PET	GMS Safri Feroz Khel	GPS Mandra Khel
330.	Syed Anwar	PTC	GPS Garhi Mishfi	GPS Mandati
331.	Muhammad Israfeel	PTC	GMS Baghnak	GPS Mandati
332.	Noor Man Shah	PTC	GPS Ghulak	GPS mandati
333.	S-Muhammad Sabtain	PTC	GPS Babera Laki	GPS Kurez
334.	Nauman Ali	PTC	GPS Mulla Koor	GPS Kurez
335.	Sajjad Ali	PTC	GPS Safri Utman Khel	GPS Kalat
336.	Shamas Abbas	PTC	GHS Avi Mela	GPS Kalat
337.	Nasirud Din	Qari	GPS Garhi Mishfi	GPS Jatta Mishfi
338.	Fazal Bari	PTC	GPS Khawas Khel	GPS Jalaka Mela
339.	Mami Khan	TT	GPS Saray Garay	GPS Issa Khel
340.	Khalil Ur Rehman	PTC	GPS kool	GPS Issa Khel

S#	Name of Teacher	Desig:	Name of Institution	Deployed to
341.	Khaista Rehman	PTC	GHS Manz Garhi	GPS Issa Khel
342.	Mohammad Anwar	PTC	GPS Karapa Samana	GPS Inzer Pali
343.	Alima Jan	PTC	GPS Sraka AKhel	GPS Inzarpati
344.	Munawra Shah	PTC	GPS Sarki Khel	GPS Inzarpati
345.	Munawar Khan	PTC	GHS Injawaer	GPS Injawar
346.	Arbab Khan	PTC	GHS Injawaer	GPS Injawar
347.	Fazal Rahman	PTC	GMS Bugara Mishli	GPS Ibrahimzona
348.	Mohammad Nadeem Shah	TT	GPS Zanda	GPS Ibrahimzona
349.	Wajid Muhammad	PTC	GPS Khangar Boor	GPS Ibrahimzona
350.	Muzamil Khan	PTC	GPS Gandi Tall	GPS Hassan Shah Kali
351.	Kefayat Ullah	PTC	GPS Mir Kalam Khel	GPS Hanif Jan Kali
352.	Sami Ullah	PTC	GMS Yakho Kandoq	GPS Gulistan
353.	Adam Khan	TT	GPS Bari Khel	GPS Gulistan
354.	Aqeel Hussain	PTC	GPS Badama	GPS Dio Sam
355.	Inam Ali	PTC	GPS Kago Kamar	GPS Derwezai
356.	Muhammad Munir Khan	PTC	GPS Khee Kada No2	GPS Dai Khel
357.	Muhammad Ilyas	PTC	GPS Alwala Mela	GPS Chaman Sheikhan
358.	Syed Mohammad Ajmal	DM	GMS Safri Feroz Khel	GPS Chaman Janna
359.	Syed Mohammad Haroon	TT	GPS Dana Khawala	GPS Chaman Janna
360.	S.Muhammad Haroon	TT	GPS Dana Khawala	GPS Chaman Janna
361.	Muhammad Javed	CT	GMS Ghuz Garh	GPS Chaman Janna
362.	Noor Muhammad	PTC	GPS Khangar Boor	GPS Biland Khel No.02
363.	Zali Mat Khan	PTC	GMS Slara Kada	GPS Biland Khel
364.	Rizwan Khan	PTC	GPS Oblan	GPS Bezot
365.	Minhaj Ali	PTC	GPS Jaba Kada	GPS Baza Lower
366.	Abdul Wadood	TT	GPS Takhtak Mian Chan	GPS Bada Sheikhan
367.	Laiq Khan	PTC	GHS Avi Mela	GPS Anjani
368.	Niqab Ali	PTC	GPS Toor Smat	GPS And Khel Payan
369.	Iliaf Hussain	PTC	GPS Dubandi	GPS And Khel
370.	Gul Rahim	PTC	GPS Pershan Tang	GPS Alwara Mela
371.	Hafiz rehman	TT	GPS Pershan Tang	GPS Alwara Mela
372.	Ghalib Hussain	PTC	GPS Babera Laki	GPS Abodag
373.	Syed Azmat Hussain	PTC	GPS Darrah Sultan Nawasi	GPS Abodag
374.	S.Tajmal Hussain	PTC	GPS Nakata Sheikhan	GPS Abo Dag
375.	Issa Khel	CT	GMS Safri Feroz Khel	GPS Abdur Rahim Khel
376.	Yarbat Khan	PTC	GPS Nari Kada	GPS Melo Sar
377.	Rajab Ali	CT	GHS Dran Sheikhan	GMS Zera
378.	S-Awan Ali	PET	GHS Avi Mela	GMS Zera
379.	Syed Shah Razi	CT	GPS Khawaja Khizar	GMS Zera
380.	Ghulam Jan	PTC	GPS Laghar Darrah	GMS Wam Panra
381.	Zahir Ali	SET(Sc:)	GPS Garhi Mishli	GMS Wam Panra
382.	Pir Bad Shah	PET	GPS Garhi Mishli	GMS Wam Panra
383.	Mohammad Shafiq	AT	GPS Garhi Mishli	GMS Wam Panra
384.	Syed Sajjad Hussain	SCT	GHS Spidar	GMS Suleman Khel
385.	Javed Hussain	CT	GHS Dran Sheikhan	GMS Suleman Khel
386.	Ali Murtaza	PET	GHS Dran Sheikhan	GMS Suleman Khel
387.	Iqbal Hussain	CT	GMS Safri Feroz Khel	GMS Suleman Khel
388.	Lal Shereen	TT	GHS Injawaer	GMS Injawar
389.	Nowshed Ali	PTC	GPS Nakata Sheikhan	GMS Dippa

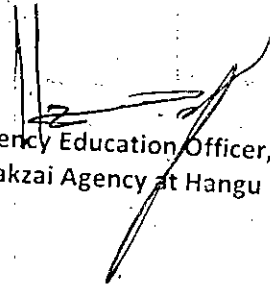
S#	Name of Teacher	Desig:	Name of Institution	Deployed to
390.	Yousaf Hussain	PTC	GPS Garhi Mishti	GMS Dippa
391.	Said Abul Hassan	C.T	GHS Biland Khel	GMS Dippa
392.	S.Azizul Hassan	PTC	GPS Oat Mela	GMS Darrah Garhi
393.	Akmal Hassan	CT	GHS Avi Mela	GMS Darrah Garhi
394.	Malook Khan	TT	GPS Obian	GMPS Shana Mela
395.	Ikhtiar Hussain	PTC	GPS Damber Lasti	GMPS Kasoo Killi
396.	Waheed Khan	DM	GMS Ghuz Garh	GHS Tooti Bagh
397.	Alam Zada	C.T	GHS Injawaer	GHS Tooti Bagh
398.	Shah Noor Khan	C.T	GHS Saifal Dara	GHS Tooti Bagh
399.	Ahmad Ali	C.T	GHS Dradar	GHS Tooti Bagh
400.	Noor Habib	TT	GHS Saifal Dara	GHS Saifal dara
401.	Luqman Shah	TT	GPS Nakata Sheikhan	GHS Mishti Bazar
402.	Farmanullah	PET	GMS Kasha	GHS Mishti Bazar
403.	Qimat Khan	DM	GHS Dran Sheikhan	GHS Mishti Bazar
404.	Aqal Rahman	TT	GPS Garhi Mishti	GHS Mishti Bazar
405.	Sarfaraz Khan	Head Master	GHS Avi Mela	GHS Mishti Bazar
406.	Saeed Rehman	AT	GHS Avi Mela	GHS Mishti Bazar
407.	Khana Gul	Qari	GHS Avi Mela	GHS Mishti Bazar
408.	Chaman Khan	PET	GHS Ghiljo	GHS Mishti Bazar
409.	Asghar	SET(Arts)	GMS Ghuz Garh	GHS Mandati
410.	Sahib Khan	TT	GPS Damber Lasti	GHS Mandati
411.	Umar Farooq	Lab: Assistant	GHS Avi Mela	GHS Mandati
412.	Zamin Ghulam	CT	GPS Garhi Mishti	GHS Kureez
413.	Sadiq Ali	DM	GPS Garhi Mishti	GHS Kureez
414.	Zahid Hussain	CT	GHS Avi Mela	GHS Kureez
415.	S.Sajjad Sherazai	C.T	GHS Spidar	GHS Kureez
416.	Muhammad Ayaz	PTC	GMS Ghuz Garh	GHS Khawa Stori Khel
417.	Noora.Dada	SET	GHS Ghiljo	GHS Khawa Stori Khel
418.	Ikram Ullah	C.T	GHS Dradar	GHS Jalaka Mela
419.	Inayat Ullah	C.T	GHS Injawaer	GHS Inzarpati
420.	Minat Khan	PTC	GPS Khee Kada No2	GHS Gulistan
421.	Umar Janan	PET	GMS Injawaer	GHS Gulistan
422.	Adam Khan	PTC	GPS Baza Upper	GHS Gulistan
423.	Minat Khan	PTC	GPS Khee Kada No2	GHS Gulistan
424.	Ghazi Mohammad	TT	GPS Darrah Sultan Nawasi	GHS Gulistan
425.	Waheed Khan	DM	GHS Ghiljo	GHS Gulistan
426.	Shafiq Khan	C.T	GHS Ghiljo	GHS Bilnad Khel
427.	Shafi Zaman	SET(Arts)	GHS Avi Mela	GHS Biland Khel
428.	Asmatullah	DM	GHS Avi Mela	GHS Biland Khel
429.	Muhammad Shafi	D.M	GMS Stara Kada	GHS Biland Khel
430.	Muhammad Farooq	SET	GHS Manz Garhi	GHS Biland Khel
431.	Ali Haider	PET	GMS Toor Kanri	GHS Biland Khel
432.	Muhammad Ibrahim	A.T	GHS Dradar	GHS Bazed Khel
433.	Muhammad Abdullah	SET	GHS Manz Garhi	GHS Bazed Khel
434.	Nawab Nawaz	CT	GHS Avi Mela	GHS Bazed Khel
435.	Nasratullah	SET(Sc:)	GHS Dran Sheikhan	GHS Bazed Khel
436.	Asadullah	SET(Sc:)	GHS Dran Sheikhan	GHS Bazed Khel
437.	Muhammad Kalim	CT	GHS Dran Sheikhan	GHS Bazed Khel
438.	Nazeef Khan	Lab:Assistant	GHS Dran Sheikhan	GHS Bazed Khel

17

S#	Name of Teacher	Desig:	Name of Institution	Deployed to:
439	Muhammad Izlaf	CT	GPS Garhi Mishti	GHS Bazed Khel
440	Bakhtiar Khan	SET (Sc)	GHS Avi Mela.	GHS Bazed Khel
441	Zamin Jan	PTC	GPS Darrah Sultan Nawasi	Absentsince long
442	Shakeel Rehman	PTC	GPS Star Koli	GPS Ziarat Mela
443	Syed Abbas Raza	PTC	GPS Dubandi	GPS Zaridar

Endst No. 2335-2780

Dated: 4/5/2010

  
Agency Education Officer,  
Orakzai Agency at Hangu



DIRECTORATE OF EDUCATION, FATA SECRETARIAT, PESHAWAR

TRANSFER

ANNEX D

18

The following SSTs / AAEO are hereby transferred in their own pay and scale w.e.f the date of taking over charge in the schools noted against each.

S. No	Name / Designation	Posted at	Remarks
1	Mr. Rehmat Khan AAEO office of the AEO Orakzai Agency	GHS Totti Bagh Orakzai Agency	Against a vacant SST post
2	Asadullah SST GHS Dran Shaikhan (Orakzai)	Office of the AEO Orakzai Agency	Vice S. No. 1

NOTE:-

- 1 Charge report should be submitted to all concerned
- 2 TA/DA etc is not allowed
- 3 The services of S.No. 2 will be utilized as science teacher when GHS Dran Shaikhan Orakzai Agency is reopened.

DIRECTOR EDUCATION (FATA)

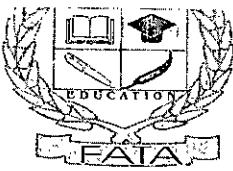
Endst: No. 2008-14 /A-12/Asadullah SST Dated Pesh: the 20/2/2015

Copy forwarded to the:-

- 1 Agency Education Officer Orakzai Agency.
- 2 Agency Accounts Officer Orakzai Agency.
- 3 Head Master GHS Totti Bagh Orakzai Agency.
- 4 Head Master GHS Dran Shaikhan Orakzai Agency.
- 5-6 Officers concerned.
- 7 PA to Director Education FATA.

Dy: Director(Estab)





FATA SECRETARIAT  
DIRECTORATE OF EDUCATION

Warsak Road Peshawar

No/2357-d61 /11  
A-17 General/AAEO

6/10

To

All the Agency Education Officers  
in FATA

Subject: SELECTION CRITERIA FOR THE POST OF AAEO (M/F)

20  
ANNEX E

I am directed to convey the following criteria duly approved by the competent authority for transfer against the post of AAEO (M/F) in your respective Agencies for strict compliance while submitting proposal to this Directorate:-

- i) Seniority position of those to be considered for posting as AAEO/MF should be in the top 10 of the SETs seniority list of the concerned Agency/FR
- ii) Should have clean record of service and no departmental proceedings should be pending against any of those included in the panel
- iii) Should have the ability to deal with the public tactfully and have moral courage to carry out proper feasibility
- iv) A panel of at least three SETs in order of seniority should be prepared for a single post for selection of one through interview
- v) Recommendation of concerned Agency Education Officer would also be considered but not binding
- vi) Knowledge of Budget/Accounts, PC-IV and APT rules including procedure in disciplinary cases will be considered as additional qualification
- vii) Maximum tenure of the post will be five years based on good performance otherwise, the incumbent could be posted out any time on administrative grounds/poor performance
- viii) Once an official has completed 05 years tenure, he/she will not be re-posted as AAEO
- XI) Due to acute shortage of science teachers in high schools SET (Science) will not be considered for the post of AAEO

ADDL: DIRECTOR (ESTAB)

CC

- 1 PS to Secy A&C FATA Secretariat
- 2 PA to DE FATA Local Directorate

ADDL: DIRECTOR (ESTAB)

بخدمت جناب ڈائریکٹر ایجوکیشن فاٹا پشاور

Annex F

21

عنوان: درخواست برائے منسوخی ٹرانسفر آرڈر (AAEO)

Appeal for Justice

جناب عالی!

- ۱۔ گزارش ہے کہ فدوی گزشتہ چار سالوں سے ایجنسی ایجوکیشن آفس اور کزنی ایجنسی میں (AAEO(DEV) کی پوسٹ پر خدمات انجام دے رہا ہے اور اللہ کے فضل و کرم سے تاحال اپنی ڈیوٹی ایمانداری سے انجام دے رہا ہے۔ گزشتہ روز بے بنیاد الزامات کی بنیاد پر میرے ٹرانسفر کے احکامات ذاتی عناد کی وجہ سے جاری ہوئے جسکی تفصیل یوں ہے۔
  - ۲۔ احمد خان اور کزنی سابق ڈپٹی سیکرٹری سرورسز فاٹا گزشتہ ایک سال سے اپنے رشتہ دار اسد اللہ SET کو میری جگہ لانا چاہتے تھے۔ مگر ناکام رہے کیونکہ وہ سائنس SET ٹیچر ہے اور قانونی طور پر اس انتظامی پوسٹ کے لئے اہل نہیں (Criteria منسلک ہے)۔ دوسری یہ کہ وہ مسلسل تین سالوں سے غیر حاضر ہے اور اپنا ذاتی کاروبار چلاتا ہے۔ ہم نے احمد خان صاحب کے 4 رشتہ داروں سے جو کہ مسلسل ڈیوٹی سے غیر حاضر تھے ایک ماہ کی کٹوتی ماہ مئی 2014 میں کی تھی کیونکہ وہ گھروں میں بیٹھے تنخواہ وصول کر رہے تھے۔ جس پر برہم ہو کر انہوں نے کیس مانیٹرنگ ونگ کو بھجوا دیا اور ہم نے وہ تمام غیر حاضری کی ثبوت کمیٹی کے سامنے پیش کئے اور انکو آئری کمیٹی نے دفتر کو الزامات سے بری کر دیا اسی روز سے وہ ہمارے دفتر کو تنگ کرتا رہتا ہے اور بے جا مداخلت کرتا ہے۔
  - ۳۔ جناب والا: فاٹا ڈائریکٹوریٹ میں اس کا ایک نمائندہ محمد اللہ نامی اسٹنٹ ڈائریکٹر آئی ٹی کی پوسٹ پر تعینات ہے اور وہ گمنام خطوط لکھ کر دفتر ایجوکیشن اور میرے خلاف سازشوں میں لگا رہتا ہے جن شکایت کی بنیاد پر مجھے ٹرانسفر کیا گیا۔ لہذا میرے خلاف انکو آئری کروا کر تحقیقات کی جائیں تاکہ اصل حقائق سامنے آجائیں اور اسد اللہ کی ٹرانسفر یا تعیناتی کی احکامات تاحکم ثانی کینسل کیا جائے۔ اس لئے کہ ایجنسی ایجوکیشن میری کارکردگی سے مطمئن ہے اور سابق پولیٹیکل کامیری کارکردگی کا اعترافی خط بھی منسلک ہے۔
- امید ہے کہ جناب والا میرے درخواست پر ہمدردانہ غور فرما کر انصاف کے تقاضے پورے کرائیں گے۔

مورخہ: 20 فروری 2015

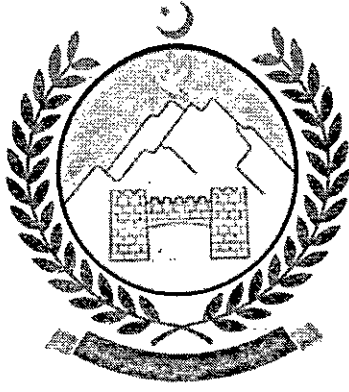
رحمت خان

اسٹنٹ ایجنسی ایجوکیشن آفیسر اور کزنی ایجنسی

DE FATA

1932 dated 25/2/15

F



ANNEX "G"

22

# ESTA CODE

**ESTABLISHMENT CODE KHYBER PAKHTUNKHWA  
( REVISED EDITION ) 2011**

**A COMPENDIUM OF LAWS, RULES AND INSTRUCTIONS  
RELATING TO THE TERMS AND CONDITIONS  
OF PROVINCIAL CIVIL SERVANTS**

**COMPILED BY;  
(O&M) SECTION  
ESTABLISHMENT & ADMINISTRATION DEPARTMENT**

MOBILE NO. 0342-8383141  
PHONE: 021-5511381  
PESHAWAR CITY  
ISLAMIA CLUB BUILDING, KHAYR BAZAR  
ROOM NO. 1, UPPER FLOOR  
OFFICE:

(ADVOCATE)  
MOOB MOHAMMAD KHATTAK

ACCEPTED

CLIENT

Dated: 28 / 11 / 2012

deposited on my/our account in the above noted matter.  
I/we authorize the said Advocate to deposit, withdraw and  
engage/appoint any other Advocate Counsel on my/our cost,  
without any liability for his default and with the authority to  
my/our Counsel/Advocate in the above noted matter,  
compromise, withdraw or refer to arbitration for me/us as  
KHATTAK, Advocate, Peshawar to appear, plead, act,  
DO hereby appoint and constitute MOOB MOHAMMAD  
I/we Muhammad Ali Khan (Registration No. 3)

Muhammad Ali Khan (DEFENDANT)  
(RESPONDENT)

VERSUS

Muhammad Ali Khan (PETITIONER)  
(PLAINTIFF)  
(APPELLANT)

OF 2012

IN THE COURT OF MR. Justice Iqbal Javed

AMANTAJAKAN

## Posting and Transfer

23

### Statutory Provision.

#### Section 10 of the NWFP Civil Servants Act, 1973.

**Posting and Transfer.** Every civil servant shall be liable to serve anywhere within or outside the Province, in any post under the Federal Government, or any Provincial Government or Local authority, or a Corporation or body set up or established by any such Government:-

Provided that nothing contained in this section shall apply to a civil servant recruited specifically to serve in a particular area or region;

Provided further that, where a civil servant is required to serve in a post outside a service or cadre, his terms and conditions of service as to his pay shall not be less favourable than those to which he would have been entitled if he had not been so required to serve.

#### 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) Existing tenure of posting/transfer of three (03) years for settled areas and two (02) years for unattractive/hard areas shall be reduced to two (02) years for settled areas, 01½ years for unattractive areas and one year for hard areas.
- v) <sup>79</sup>[            ]

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79 Para-I(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 Rule 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.



- vi) <sup>80</sup>While making posting/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. Save Tehsildars/Naib Tehsildars within a division in respect of whom the concerned Commissioner will exercise the same power. 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.

Provided that the power to transfer Political Tehsildars and Political Naib Tehsildars within FATA between different divisions shall rest in Additional Chief Secretary FATA.

- vi (a) All Officers/officials selected against Zone-I/FATA quota in the Provincial Services should compulsorily serve in FATA for at least 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.
- viii) No posting/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 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



<sup>81</sup>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 column 2 thereof:

<b>Outside the Secretariat</b>	
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-
<b>In the Secretariat</b>	
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	Secretary of the Department concerned.
b) Within the Secretariat from one Department to another.	Chief secretary/Secretary Establishment.
3. Officials up to the rank of Superintendent:	Secretary of the Department concerned.
a) Within the same Department	Secretary of the Department in consultation with Head of Attached Department concerned.
b) To and from an Attached Department	
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.

26

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 posting/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.

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.

5. 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).



No 491

Dated 8 / 4 / 2015

From: The Head Master,  
GHS Sarobi Garhi(Orakzai Agency)

To, The Agency Education Officer,  
Orakzai Agency at Hangu.

ANNEX H<sup>3</sup>  
27

SUBJECT: APPOINTMENT AS A SST(SC) TEACHER AT  
GHS SAROBI GARHI (ORAKZAI AGENCY)

MEMO,

With due respect, I want to bring in your notice, that two posts of SST ie; one is science & other is General have fallen vacant in my school since long. The students a specially 9<sup>th</sup>, and 10<sup>th</sup>, class have been effected and have not been completed their courses in due time. We have already been submitted an application for the appointment of the side teacher a few months ago, but no fruit full result comes out in this respect

It is therefore requested to kindly consider my case sympathetically I shall be pray for your long life prosperity

Thanking You Sir..

A.A.E.O.  
For immediate compliance  
(L)  
27/9/15

Zafar  
Head Master  
GHS Sarobi Garhi  
Orakzai Agency

*[Handwritten signature]*

محکمیت خباب آجی آکوشن آفیسر صاحب اور انری آجی

28

صبا عالی

زبانہ ادب گزارشی ہے کہ GHS جاکملا اور انری آجی  
میں سائنس ٹیچر اسامی مارج 2014 سے حالی پڑی ہے  
سائنس ٹیچر نہ ہونے کو م سے 10/10 د 9/10 ملا سوں کے  
بچوں کا قیمتی وقت ضائع ہو رہا ہے

علوہ از میں دو سٹی ٹیچرز سید شاہ عباسی اور سید شاہ رافی  
اپنی شیعہ مسلک سے تعلق رکھتے ہیں مئی شیعہ خالد کٹیڈی  
کو م سے نہیں آ رہے ہیں۔ جیسی وجات سے سکول بڑا متاثر  
ہو گیا ہے

اس مسئلے میں خباب کے ذہن میں الٹی سی ہے کہ پھر دامن خود فرما کر  
دو اپن نسیم گھنیزا پسر کزن کا اور ایک سائنس ماسٹر کھینائی  
کا حکم صادر فرما کر شکور فرما دیں

PRINCIPAL  
G.H.S. Jalaka Meta  
Orakzai Agency 9 2014

GHS جاکملا

پریسٹا علیا پسر

Handwritten signature

H/c.  
for process.  
9/10/15

No 5376-77 /

Dated Hangu the 22/4 /2015.

From:

The Agency Education Officer  
Orakzai Agency at Hangu

To:

The Director of Education  
FATA Secretariat Peshawar.

ANNEX I

28


Subject:- Request for Transfer/Adjustment of SST (Science)

Memo:

The Principal GHS Jalaka Mela Orakzai Agency and Head Master GHS Sarobi Garhi Orakzai Agency approached this office through written applications which are enclosed respectively , requesting for transfer/Adjustment of SST (Science) which is lying vacant since long.

The students of 9<sup>th</sup> and 10<sup>th</sup> classes are suffering badly.

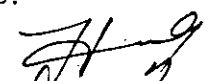
In light of the above facts it is extremely requested that an early arrangement for filling the above posts may kindly be made accordingly.

  
Agency Education Officer  
Orakzai Agency at Hangu

Endstt; No \_\_\_\_\_ /

dated Hangu the \_\_\_\_\_ /2015.

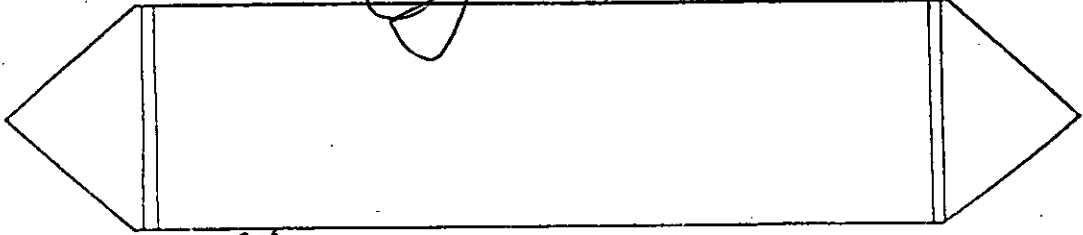
Copy to the political agent Otrakzai Agency at Hangu.

  
Agency Education Officer  
Orakzai Agency at Hangu





# بعدالت سروکار قبول



دفعہ 2، منجانب دسلاہ  
بنام حکومت و عدلیہ

رجسٹر خان

موزخہ  
مقدمہ  
دعویٰ  
جرم

## باعث تحریر آئینکے

مقدمہ مندرجہ عنوان بالظلم میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ در  
آن مقام کیلئے حکومت و عدلیہ کے لئے  
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز  
دکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور  
بصورت ڈگری کرنے اجراء اور صولی چیک دروپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق  
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی  
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور  
کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار  
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیار حاصل ہوں گے اور اس کا ساختہ  
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جائے التوائے مقدمہ کے سبب سے وہ ہوگا۔  
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو دکیل صاحب پابند ہوں گے۔ کہ پیروی  
مذکور کریں۔ لہذا ادکالت نامہ لکھ دیا کہ سندر ہے۔

المرقوم \_\_\_\_\_ ماہ \_\_\_\_\_ 20

العبد \_\_\_\_\_ واہ العبد \_\_\_\_\_

کے لئے منظور ہے۔

بمقام  
\_\_\_\_\_

**BEFORE THE KHYBER PUKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

Appeal No: 498/2015

Rehmat Khan SET GMS Bagan Kurram Agency.....Appellant.

**VERSUS**

1. Additional chief Secretary FATA, FATA Secretariat Warsak Road Khyber Pakhtunkhwa Peshawar.
2. The Director Education FATA, FATA Secretariat Peshawar.
3. Asadulah AAEO Orakzai Agency.....Respondents.

**Para-wise comments on behalf of respondent No: 1 and 2.**

**Respectfully Shewth.**

**Preliminary Objection**

1. That the appellant has got no cause of action to file the instant appeal.
2. That the appellant has not come to this Honourable Tribunal with clean hands.
3. That the appellant has concealed material facts from this Honourable Tribunal.
4. That the appellant is estopped by his own conduct to bring the present appeal.
5. That the appeal is bad due to mis-joinder and non-joinder of necessary parties.
6. That the appeal is barred by law and no departmental appeal is made to the competent authority against the impugned order.

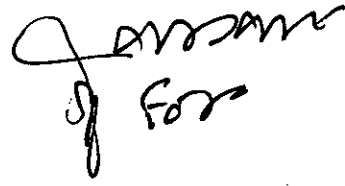
**On Facts:**

1. No comments. Pertains to record.
2. No comments. Pertains to record.
3. No comments. Pertains to record.
4. Incorrect. The appellant completed his tenure as he is working since 16/2/2010 as AAEO Orakzai. According to criteria Para No. VIII "once an official has completed 05 years tenure he/she will not be re-posted as AAEO". In this regard section-10 of Khyber Pakhtunkhwa Civil Servant Act-1973 is also clear "Every Civil Servant shall be liable to serve anywhere inside or outside the province. Therefore the appellant has no right to perform his duty according to his wishes".
5. As explained in Para. No. 4 above.

**Grounds:**

- A. Incorrect. The appellant has completed his normal tenure and as per criteria issued by the Competent Authority for the posting of AAEO the appellant is not entitled for re-adjustment.
- B. Incorrect. The adjustment order of the appellant has been made by the Competent Authority in the interest of Public Service and for the smooth running of the Department.
- C. Incorrect. The appellant has completed his normal tenure as per criteria issued by the Competent Authority for the adjustment of AAEO. In light of criteria Section No. VIII the appellant is not entitled for re-posting. Except this the case of AAEO is under process as & when completed all AAEO's will be adjusted according to law/as per criteria as no one is allowed to violate the Government rule/policy.
- D. Incorrect. No complaint has been received to the competent authority on the basis of which action can be taken against the R.No.3.
- E. Incorrect. The adjustment has been made on temporary basis. The whole process of the adjustment of AAEO will be completed in accordance to law/rules/as per criteria.
- F. As explained in Para-C.
- G. Each & every case has its own merit & circumstances.
- H. Respondents are also seeks permission to advance other grounds & proofs at the time

In light of the above facts it is humbly requested to please dismiss the appeal having no legal force.



Respondent NO.1

Additional Chief Secretary FATA

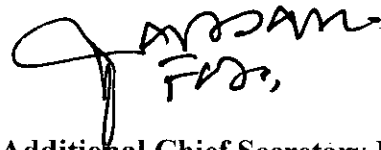
Respondent NO.2



Director Education FATA

**AFFIDAVIT**

We the above respondents do hereby declare and affirm that the above comments are true and correct to the best of our Knowledge and belief that nothing has been concealed from this Honorable Tribunal.



Respondent NO.1

Additional Chief Secretary FATA

Respondent NO.2



Director Education FATA

**VAKALATNAMA**

IN THE COURT OF KPK Service Tribunal Peshawar

OF 2015

Rehmat Khan

(APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

**VERSUS**

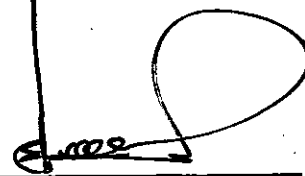
Govt. of KPK & others

(RESPONDENT)  
(DEFENDANT)

I/we Asadullah (Respondent No. 3)

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. 26 / 11 / 2015



**CLIENT**



**ACCEPTED**

**NOOR MOHAMMAD KHATTAK  
(ADVOCATE)**

OFFICE:

Room No.1, Upper Floor,  
Islamia Club Building, Khyber Bazar,  
Peshawar City.

Phone: 091-2211391

Mobile No.0345-9383141

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

**Appeal No. 488/2015**

**Rehmat khan**

**VS**

**EDUCATION DEPTT:**

**REPLY ON BEHALF OF PRIVATE RESPONDENT NO.3**  
**(Mr. Asadullah, ASSISTANT AGENCY EDUCATION**  
**OFFICER, ORAKZAI AGENCY)**

**R/SHEWETH:**

**PRELIMINARY OBJECTIONS:**

1. That the appellant has got no cause of action/locus standi to file the instant appeal.
2. That the appellant has not come to this Honorable Tribunal with clean hands.
3. That the appellant has concealed materials facts from this Honorable Tribunal.
4. That the instant appeal is not maintainable in its present form.
5. That the appeal is bad due to non-joinder and mis-joinder of necessary parties.
6. That the appeal is not maintainable U/S 10 of the civil servant Act 1973.
7. That the appeal of the appellant is time barred.

**ON FACTS:**

1. Pertains to record hence need no comments.
2. Incorrect and misconceived. That according to the transfer/posting policy of the Provincial Government of Khyber Pakhtunkhwa the normal tenure for hard area on one station is eighteen months (18) and as such the appellant has completed more than 4 years as Assistant Agency Education Officer, Orakzai Agency, therefore the appellant has rightly been transferred vide order dated 20.2.2015. Copy of the record is attached as annexure ..... **R.**
3. Incorrect and misconceived. That private respondent No.3 has served the Education Department at far flung areas of the province quite efficiently and up to the entire satisfaction of his superiors. Moreover the replying respondent during service had never absented himself from duty and due to that reason the competent authority posted the replying respondent as Assistant Agency Education Officer, Orakzai Agency.



4. Incorrect and misconceived. That replying respondent has not used any political pressure upon the administration for his posting as Assistant Agency Education Officer, Orakzai Agency rather it is the appellant who used political as well as undue influence over the authorities to stick himself to the post of AAEO, Orakzai Agency for more than four years.
5. Incorrect and misconceived hence denied.

**GROUNDS:**

- A- Incorrect and misconceived. That the order dated 20.2.2015 is issued by the competent authority in accordance with law and rules.
- B- Incorrect. All Government servants are bound to perform their duties any where according to the instructions/rules in vogue in Education Department, and the posting order is not issued by the concerned authority on political instruction rather the same has been issued in the best interest of public service.
- C- Incorrect and misconceived. That in light of the transfer/posting policy the normal tenure for hard area is 18 months and as such the appellant has spent more than four years on the subject post, therefore in light of the above the appellant has no prima facie.
- D- Incorrect and misconceived. That as explained above the appellant has no case to argue rather the appellant wasting the precious time of this august Tribunal by filing the instant baseless appeal. Moreover the replying respondent has served the Department quite efficiently and up to the entire satisfaction of his superiors and had never absented himself from duty.
- E to H: Incorrect and misconceived hence denied.

It is therefore most humbly prayed that on acceptance of this reply the appeal of the appellant may kindly be dismissed with cost.

PRIVATE RESPONDENT NO.3

  
ASADULLAH

THROUGH:

  
NOOR MOHAMMAD KHATTAK  
ADVOCATE

No 2975 dated 05/8/2014

Attention M

Ali-Shah Add. Director

R-4

OFFICE OF THE AGENCY EDUCATION OFFICER ORAKZAI AGENCY AT HANGU

SERVICE PROFILE (LAST 10 YEARS)

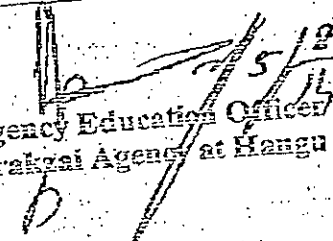
S.#	Name & Desig:	Domcile	Place of Posting	From	To	Remarks
1	Lal Zada A.E.O	Bajawar	Principal BPS-18 GHS Loe Sam Bajawar	01-04-2004	11-01-2009	
			Principal BPS-19 GHS Subhan Khawar Baj	12-01-2009	11-03-2009	
			A.E.O. Orakzai Agency	12-03-2009	01-04-2011	
			A.E.O. Bajawar Agency	02-04-2011	01-04-2012	
			A.E.O. Orakzai Agency	02-04-212	Upto date	
2	Kehmat Khan AAEO	Orakzai	SET GHS Inzarpati	10-07-2004	29-06-2006	
			AAEO Project	30-06-2005	22-04-2009	
			SET GHS Dran Sheikhani	23-06-2009	23-04-2011	
			AAEO Orakzai	24-04-2011	Upto date	
3	Habib Hussain AAEO	Orakzai	SET GMS Suliman Khei	01-07-2004	10-09-2013	
			AAEO	11-09-2013	Upto date	
4	Deulat Shah AAEO	Orakzai	C.T GHS Saifal Dara	01-07-2004	19-03-2012	
			SET GHS Saifal Dara	20-03-2012	12-09-2013	
			AAEO	13-09-2013	Upto Date	
5	Nabila AAEO	Orakzai	AAEO Orakzai	01-07-2004	17-07-2007	
			SET GGHS Nazir Shah Kali	18-07-2007	02-07-2009	
			AAEO FR Peshwar	03-07-2009	27-05-2012	
			AAEO Orakzai	28-05-2012	Upto date	
5	Haq Nawaz Physical Supervisor	Orakzai	AEO Office Orakzai	01-07-2004	Upto Date	
6	Mahboob Khan Assistant	Orakzai	S/Clerk GHS Mishki Bazar	01-07-2004	16-09-2006	
			S/Clerk AEO Office Orakzai	17-09-2006	31-05-2011	
			Assistant AEO Office	01-06-2011	Upto date	

ATTESTED


*[Signature]*

FRK-NOT... 5 AUG 2014 2:03PM P1

7	Sohan Ali S/Clerk	Orakzai	J/Clerk AEO Office Orakzai	01-07-2004	19-01-2012	
			S/Clerk AEO Office Orakzai	20-01-2012	Upto Date	
8	Ayub Khan J/C	Orakzai	GHS Tooti Bagh	01-07-2004	16-09-2005	
			AEO Office Orakzai	17-09-2005	Upto date	
9	Muhammad Hussain J/C	Orakzai	AEO Office Orakzai	01-07-2004	18-10-2012	
			GHS Inzarpati	19-10-2012	13-02-2013	
			AEO Office Orakzai	14-02-2013	Upto Date	
10	Gul Zat Khan KPO	Orakzai	AEO Office Orakzai	01-07-2004	29-05-2013	
			Regularized AEO Office	30-05-2013	Upto date	

  
 Agency Education Officer/  
 Orakzai Agency at Hangu

ATTESTED



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 498 /2015

Rehmat Jan..... Appellant

Versus

The Addl: Secretary FATA and others..... Respondents

**REJOINDER ON BEHALF OF APPELLANT IN RESPONSE TO REPLY FILED BY RESPONDENTS NO.1&2.**

Respectfully Sheweth,

**Preliminary Objections:**

Preliminary objections raised by answering respondents are erroneous and frivolous. The appellant has got cause of action and for that matter locus standi to file the instant appeal. The estoppel has no relevance in the instant issue and moreover, the appellant has approached the Hon'ble Tribunal with a bonafide claim. All the necessary parties have been arrayed as Respondents. The appeal is in its correct form and shape.

**Facts:**

- 1-3. Paras-1 to 3 of the appeal being not replied hence admitted.
4. Reply to Para-4 of the appeal is incorrect hence denied. The impugned order is in violation of the selection criteria issued by the Respondents vide circular dated 06.10.2011 and Section-10 of the Khyber Pakhtunkhwa Civil Servants Act-1973 has got no relevance in the instant case.
5. Para-5 of the appeal being not replied hence admitted.

**Grounds:**

- A. Reply to Ground-A of the appeal is incorrect hence denied. The appellant was not treated according to law and rules on the subject matter.
- B. Reply to Ground-B of the appeal is misconceived hence denied.
- C. Reply to Ground-C of the appeal is incorrect hence denied. The appellant has not completed the tenure as per policy issued by Respondents.
- D. Reply to Ground-D of the appeal is incorrect. Due to influence no action was taken against Respondent No.3 although there is enough proof against him.

E. Reply to Ground-E of the appeal is incorrect. The posting of Respondent No.3 is illegal and in violation of the law.

F&G. Ground-F&G of the appeal being not replied hence admitted.

H. Needs no rejoinder.

It is, therefore, humbly prayed that the reply of answering Respondents No.1&2 may graciously be rejected and the appeal as prayed for may graciously be accepted with costs.

*Rahman*

Through **Appellant**  
**Khaled Rahman**  
**Advocate, Peshawar**

Dated: 24 /03/2016

**Verification**

Verified as per instructions of my client, that the contents of this rejoinder are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

*[Signature]*  
Counsel

## BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 488/2015

Rehmat Khan .....Appellant

Versus

The Additional Chief Secretary and others.....Respondents

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**REJOINDER ON BEHALF OF APPELLANT IN RESPONSE TO REPLY FILED BY RESPONDENT NO.3 (Asadullah).**


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Respectfully Sheweth,

**Preliminary Objections:**

Preliminary objections raised by answering respondents are erroneous and frivolous. The appellant has got cause of action/locus standi to file the instant appeal. The appeal has been filed with a bonafide claim with the relevant facts concisely incorporated which is in its correct form and shape. All the parties are added as Respondents and Section-10 of the Khyber Pakhtunkhwa Civil Servants Act has been irrelevantly quoted. The appeal is within time.

**Facts:**

1. Being not replied hence admitted.
2. Misconceived. As per the policy guidelines issued by the FATA Secretariat (*Annexure-E page-20 of the appeal*) the tenure of posting as AAEO is five years. As per the settled law the tenure as specified by the law, the same must be respected. If the contention of the answering Respondent is admitted then he also is to be transferred having completed more than 18 months on the post w.e.f. 20.02.2015.
3. Misconceived. The answering Respondents have evasively avoided to the answer the para. The impugned order is the result of political consideration otherwise the conduct of the answering Respondents is blameworthy and is liable to

disciplinary action under the law.

4. Incorrect. The impugned order is the result of political consideration and as such is against the law.
5. Being not replied hence admitted.

**Grounds:**

- A. Incorrect. The impugned order dated 20.02.2015 has been issued in violation of the law and policy and therefore is not maintainable.
- B. Misconceived. Through the impugned order the directions/instructions/rules issued by the Government have been violated with impunity, therefore, the same is liable to be set aside.
- C. Misconceived. The tenure as per the law is five years and not 18 months. The answering Respondent has served for more than 18 months on the same post.
- D. Incorrect hence denied.
- E-H. Being not replied hence admitted.

It is, therefore, humbly prayed that the reply of answering Respondents No.3 may graciously be rejected and the appeal as prayed for may graciously be accepted with costs.

Through


Appellant

Khaled Rahnian  
Advocate, Peshawar

Dated: 27 /10/2016

**Verification**

Verified that the contents of this rejoinder are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

  
Appellant