


# FORM OF ORDER SHEET

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

**Appeal No.** 2444/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	23/11/2023	<p>The appeal of Mr. Rafiq Javid presented today by Syed Noman Ali Bukhari Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <u>27-11-2023</u>. Parcha Peshai is given to the counsel for the appellant.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

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

Rafiq Javed

Versus

Education Department

**APPLICATION FOR FIXING THE ABOVE APPEAL  
BEFORE THE PRINCIPAL BENCH PESHAWAR  
INSTEAD OF ABBOTABAD CAMP COURT.**

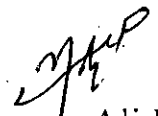
**Respectfully Sheweth:**

1. That the titled appeal is pending jurisdiction before this Hon' able Service Tribunal wherein next date of hearing is yet not been fixed.
2. That the counsel for the appellant is not in position due to health condition, travel to Abbottabad for the reason, of the above mention appeal fixed before Peshawar Principal Seat for preliminary hearing.
3. That the council Syed Noman Ali Bukhari will not able to attend the court in Abbottabad Camp Court.
4. That there is no legal bar on acceptance of this application rather it is in the best interest of justice.

It is therefore, most humbly requested that on acceptance of this application the above mentioned appeal may kindly be fixed before the principal seat been as earlier as possible the best interest of justice.

Applicants/Appellant

Through

  
Syed Noman Ali Bukhari  
Advocates High Court  
Peshawar

**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR**

APPEAL NO. 2444 /2023

Rafiq Javid

VS

Education deptt:

**INDEX**

S.No	Documents	Annexure	Page No.
1.	Memo of appeal	---	1-05
2.	Stay application	---	06-07
3.	affidavit	---	08
4.	Copy of transfer order	-A-	09
5.	Copy of rules	-B-	10-12
6.	Copy of impugned reliving order	-C-	13-14
7.	Copy of appeal	-D-	15-17
8.	Copy of impugned order	-E-	18
9.	Copy of relevant document	-E1-	19
10.	Copy of impugned adjustment	-F-	20
11.	Copy of departmental appeal	-G-	21-24
12.	Copy of high court order	-H-	25-27
13.	Copy of rejection order	-I-	28
14.	Copy of letters	-J-	29-30
15.	Copy of record	-K-	31-49
16.	Wakalat Nama		50

APPELLANT  
Rafiq Javid

Through:

(SYED NOMAN ALI BUKHARI)  
ADVOCATE HIGH COURT

UZMA SYED  
ADVOCATE HIGH COURT

Cell No: 0335-8390122  
OFFICE ADDRESS:  
4<sup>TH</sup> Floor, Room No Fr #8  
Bilour Plaza, sadar Bazar  
Peshawar.

①

**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR**

APPEAL NO. 2444 /2023

Mr. Rafiq Javid, ASDEO (M),  
Circle, Mansehra.

..... Appellant

**VERSUS**

- 1- The Secretary to Govt of KP (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The Sub Divisional Education Officer Sub Division Mansehra.
- 4- The District Education Officer Male Mansehra.
- 5- MR. Muhammad Akmal ADEO (Sport & Pvt School). Mansehra.

.....RESPONDENTS

.....

**APPEAL UNDER SECTION 4 OF THE KP SERVICE TRIBUNALS ACT 1974, AGAINST THE RELIVING ORDER DATED 09/08/2023 BY INCOMPETENT AUTHORITY AND AGAINST THE TRANSFER ORDER DATED 25/08/2023, WHEREBY THE INELIGIBLE OFFICER WAS POSTED AGAINST THE POST OF APPELLANT (SDEO) AND AGAINST THE ADJUSTMENT ORDER DATED 29/08/2023 AND AGAINST REJECTION ORDER DATED 08/11/2023 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT HAS BEEN REJECTED WITHOUT SHOWING ANY REASON.**

**PRAYER:**

**THAT ON ACCEPTANCE OF THIS APPEAL, THE IMPUGNED ORDER DATED 09/08/2023, 25/08/2023, 29/08/2023 AND 08/11/2023 MAY PLEASE BE SET-ASIDE TO THE EXTENT OF APPELLANT BEING, PASSED FOR ULTERIOR MOTIVE AND BY INCOMPETENT AUTHORITY AND IN VIOLATION OF POSTING/TRANSFER POLICY. THE RESPONDENT DEPTT: MAY FURTHER PLEASE BE DIRECTED NOT TO TRANSFER THE APPELLANT IN VIOLATION OF POSTING/TRANSFER POLICY AND RULES. ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL**

**DEEMS FIT AND APPROPRIATE THAT MAY ALSO BE  
AWARDED IN FAVOUR OF APPELLANT**

**R/ SHEWETH:**

**ON FACTS:**

- 1- That Appellant is the employee of respondent Department and is serving in the respondent Department as SST and transfer on the post of ASDEO vide order dated 26/02/2020 in the light of management cadre service rules 2019 and since posting the appellant performing his duties quite efficiently and up to the entire satisfaction of his superiors. **Copy of posting order and rules is attached as annexure-A & B.**
- 2- That the appellant was posted as ASDEO Circle Mansehra and working as ASDEO Circle Mansehra since 22/04/2021. The SDEO male Mansehra has issued a relieving chit vide No. 97-100 dated 09/08/2023 subsequently an order of additional charge of circle Mansehra which has not been received to the appellant officially up till now. Appellant received the same unofficially through a whatsapp by ADO on personal request. **Copy of reliving chit is attached as annexure-C.**
- 3- That the worthy SDEO male Mansehra is exercising the power and authority of the Honourable District Education Officer (Male) Mansehra without jurisdiction, against the law and policy of the Government. Under what law and rule he is/ empowered to relieve an officer of BPS-16, whereas he himself is in BPS-16 and relieving the officer of the same scale in BPS-16?
- 4- That appellant filed appeal against the reliving order wherein he clearly mentioned all facts but thereafter without any proper order of transfer of appellant other ineligible teacher (R-5 (SPET)) was illegally posted vide order dated 25/08/2023 at the place of appellant by showing post vacant. It is pertinent to mentioned here that in light of Management Cadre Service Rules 2019 only SST from teacher cadre is eligible for the post of ASDEO. **Copy of appeal and transfer order and relevant document is attached as annexure-D & E & E1.**
- 5- That thereafter, the adjustment order dated 29/08/2023 of the appellant was issued by the DEO (M) Mansehra in compliance of illegal order of the incompetent authority (SDEO). **Copy of impugned transfer order is attached as annexure-F.**
- 6- That Appellant feeling aggrieved filed Departmental appeal against the impugned orders, thereafter the appellant approached to Peshawar high court Peshawar for decision of departmental appeal, which was disposed off thereafter the departmental appeal of the appellant was rejected vide order dated 08/11/2023 without showing any reason which is in violation of General Causes Act

24-A and in violation of superior court judgment cited as 1991 SCMR 2330. Copies of Departmental appeal, high court order and rejection order is attached as annexure -G, H & I.

- 7- That the act of respondents by disturbing the appellant and ignoring the policy by transferring is highly illegal, mala fide and therefore the appellant being aggrieved by the same having no other adequate and efficacious remedy, files this service appeal inert-alia, on the following grounds :-.

**GROUND:**


- A- That, impugned order dated 09.08.2023, 25/08/2023 and 29.08.2023 is against the Law, posting transfer policy, facts and norms of natural justice.
- B- That it is settled principle of law that when something is to be done in a particular manner that must be done in that manner and not otherwise...
- C- That there is no law, rule to relieve a government servant without any legal posting/dismissal order by the competent authority under the law/rule after completing all the codal formalities.
- D- That the SDEO (male) Manshra is not a competent authority to relieve the appellant he is misusing/abusing his authority against the law/rule. Therefore, the impugned order is without jurisdiction and without legal authority, hence not sustainable in the eye of law and liable to be set-aside forthwith.
- E- That the entire correspondence/orders/letters of the worthy SDEO (male) Mansehra are based on personal grudges, liking disliking, mala fide intentions against the facts, grounds reality and on the whims and wishes of opponent group and just to please the blue eyed persons.
- F- That the impugned order dated 25/08/2023 was illegal, corrum non judice in light of letter dated 22/09/2023 wherein clearly stated that the ASDEO adjustment powers always be available with the Director (E&SE). **copy of letter is attached as annexure-J.**
- G- That all the impugned charges leveled in the above cited relieving chit are incorrect and have already been responded in the previous correspondence by the SDEO (male) Mansehra well in time whose copies had been duly endorsed and got received to the office of the District Education Officer (male)

Manshra. However, again appended herewith for ready reference please. **copy of record is attached as annexure-K.**

- H- That SDEO Male Manshra malafidely leveled incorrect charges against the appellants in the referred relieving chit and then without jurisdiction issued letter of handing over the charge of the circle to another ASDEO who is already involved in corrupt practices in the same circle. In this way the worthy SDEO has promoted the corrupt and blackmail.
- I- That since then the posting of the appellants as ASDEO (Male) Manshra the worthy SDEO Manshra is continuously torturing the appellants through different useless correspondence on the whims and wishes of the same blue eyed persons/hostile union group as narrated in detail in earlier correspondence attached herewith.
- J- That the appellants were transferred in haphazard manner, without consideration of any sound justification and grounds, discarding the public interest but on personal grudges and Such posting / transfer, on political grounds, are against the posting / transfer policy.
- K- That the impugned order is not a rational one and based on personal liking and disliking.
- L- That no reasons have been mentioned in the order dated 08-11-2023 which is the violation of Clause-24-A of the General Clauses Act 1897.
- M- That the treatment meted out to the appellants is a clear violation of the Fundamental Rights of the appellants.
- N- That the respondent Department acted in arbitrary and malafide manner by transferring the appellants and as such the same is against the transfer/posting policy of the Provincial Government.
- O- That this august Tribunal itself held in its judgment reported as 2012-PLC (CS) page-187 that transfer cannot be made on complaint/Administrative ground. The case of the appellants is same and is also entitled for the same relief.
- P- That, relevant law, rules and regulations have blatantly bypassed/ violated by the respondents and the relevant law, rules and regulations have never been taken into consideration by the respondents and thus the notification so passed by the respondents have no legal sanctity in the eyes of law.
- Q- That the appellants seek permission to advance other grounds and proofs at the time of hearing.

(8)

It is therefore, most humbly requested that the appeal of the appellants may be accepted as prayed for.

  
APPELLANT  
Rafiq Javid

THROUGH:

  
(SYED NOMAN ALI BUKHARI)  
ADVOCATE HIGH COURT

**CERTIFICATE:**

It is certified that no other service appeal earlier has been filed between the present parties in this Tribunal, except the present one.

  
DEPONENT

**LIST OF BOOKS:**

1. Constitution of the Islamic Republic of Pakistan, 1973.
2. The ESTA CODE
3. Any other case law as per need.

  
(SYED NOMAN ALI BUKHARI)  
ADVOCATE HIGH COURT



6

**BEFORE THE KPK SERVICE TRIBUNAL BESHAWAR**

APPEAL NO. \_\_\_\_\_/2023

Rafiq Javed

V/S

Education Deptt:

**APPLICATION FOR SUSPENDING THE OPERATION OF  
ORDER DATED 09.08.2023, 25/08/2023 and 29/08/2023 TO THE  
EXTENT OF THE APPELLANT TILL THE DISPOSAL OF MAIN  
APPEAL.**

**R. SHEWETH.**

1. That the appellant has filed an appeal along with this application in which no date is fixed so far.
2. That impugned order is passed prematurely and in violation of posting transfer policy.
3. That the transferred order dated 09.08.2023, 25/08/2023 and 29/08/2023 was made on complaint/administrative ground/personal grudges which is not permissible under the law.
4. that the post of the appellant is still vacant so no hurdle if the order was suspended further the appellant not relived the charge yet.
5. That the grounds of main appeal may also be considered as integral part of this application.
6. That the appellant has a good prima facie case and all the ingredients are in favor of the appellant.

7

It is therefore most humbly prayed that the operation of the order dated 09.08.2023, 25/08/2023 and 29/08/2023 may be suspended to the extent of the appellant till the decision of main appeal.

*[Signature]*  
APPELLANT  
Rafiq Javid

Through:

*[Signature]*  
(SYED NOMAN ALI BUKHARI)  
ADVOCATE HIGH COURT

*[Signature]*  
& *[Signature]*  
UZMA SYED  
ADVOCATE HIGH COURT

BEFORE THE KP SERVICE TRIBUNAL PESHAWAR

APPEAL NO. \_\_\_\_\_/2023


Rafiq Javed

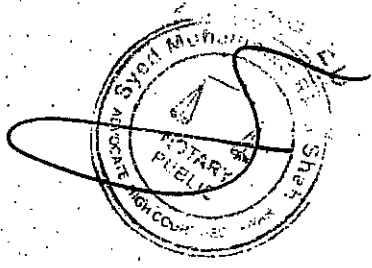
V/S

Education Deptt:

AFFIDAVIT

I, Rafiq Javed (Appellant) do hereby affirm that the contents of this service appeal and application are true and correct, and nothing has been concealed from this Honorable Tribunal.

  
DEPONENT



A 09

**DIRECTORATE OF ELEMENTARY & SECONDARY  
EDUCATION KHYBER PAKHTUNKHWA PESHAWAR**

**NOTIFICATION**

The Competent Authority is pleased to order transfer/posting of the following officers with immediate effect in the interest of public service.

S#	Name & Designation	From	To (posted as)	Remarks
1	Mr. Muhammad Bashir SST	ASDEO Circle Phulra	SST at GMS Haryala	AVP
2	Mr. Rafiq Javid SST	Jica Model Primary School Mansehra	ASDEO Circle Phulra	Vice S#1

**Note:**

1. Posting/Adjustment of Teaching Cadre Officers shall be considered as stop-gap arrangement till the arrival of Management Cadre officers.
2. The order of the above named SST (teaching cadre) will be effective subject to the condition that he will give an undertaking/affidavit on legal paper/stamp paper to DEO (M) Mansehra to the effect, not to claim seniority of Management cadre.
3. Charge Report should be submitted to all concerned.
4. No TA/DA is allowed.
5. The terms & conditions mentioned in his appointment order as SST Teaching cadre will remain intact.

**DIRECTOR**

Elementary & Secondary Education  
Khyber Pakhtunkhwa

Endst: No. 3024-26 F.NO.436/Vol-8/ADEOs (M) Transfers Dated the Peshawar 26/12/2020

Copy forwarded to the:

1. District Education Officer (Male) Mansehra
2. District Accounts Officer Mansehra.
3. Officers Concerned.
4. Master Copy

Deputy Director (Estab)

Elementary & Secondary Education  
Khyber Pakhtunkhwa

A

B/10

NOTIFICATION

Peshawar, dated the March 27, 2019

NO.SO(SM)E&SED/3-2/2016/SSRC of M.C: In pursuance of the provision contained in sub-rule (2) of rule-3 of the Khyber Pakhtunkhwa Provincial Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 and in supersession of this Department's Notification No. SO(SM)E&SED/3-2/2016/SSRC of MC dated 03-07-2018, the Elementary & Secondary Education Department in consultation with the Revenue Department and the Finance Department, hereby lay down the method of recruitment, qualification and other conditions specified in columns No. 3 to 5 of the Appendix to the Notification which shall be applicable to the posts of Schools Management Cadre under the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar and Directorate of Curriculum & Teachers Education Khyber Pakhtunkhwa Abbottabad as specified in Column No. 2 of the said Appendix.

APPENDIX

No. & Description of the Post	Minimum Qualification for Appointment by Initial Recruitment or by Transfer	Age Limit	Method of Recruitment
	3	4	5
			<p>By promotion on the basis of seniority and fitness from amongst the District Education Officers and Additional Directors (Male and Female) with at least five year service in PPS-17 as such as having successfully completed Senior Management Course.</p> <p>Provisionally by transfer of PPS-17 officers from other Districts.</p> <p>Note: In the process of promotion, a joint seniority list of District Education Officers and Additional Directors (Male and Female) shall be maintained.</p>

3-10  
(BETTER COPY PAGE NO. 26)

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

**NOTIFICATION**

Peshawar dated the March 27, 2019

**No. SO (SM) E&SED/3-2/2016/SSRC of M.C** In pursuance of the provision contained in Sub Rule (2) of Rule -3 of the Khyber Pakhtunkhwa province civil servants (Appointment, promotion & Transfer) Rules, 1989 and in supersession of this department's notification No. SO(SM)E&SED/3-2/2016/SSRC of MC dated 03/07/2018, the elementary & secondary education department in consultation with the establishment Department and the finance department, hereby lays down the method of recruitment, qualification and other conditions specified in column No. 3 to 5 of the appendix to the notification which shall be applicable to the posts of schools management cadre under the directorate of elementary & secondary education Khyber Pakhtunkhwa and directorate of curriculum & teacher education Khyber Pakhtunkhwa Abbottabad as specified in column No. 2 of the said appendix.

**APPENDIX**

S.NO.	NOMENCLATURE	MINIMUM QUALIFICATION FOR APPOINTMENT BY INITIAL RECRUITMENT OR BY TRANSFER	AGE LIMIT	METHOD OF RECRUITMENT
1	Director (BPS-20)	.....	.....	By promotion, on the basis of seniority cum fitness, from amongst the district education officers and additional directors (Male and Female) with at least five year services in BPS-19 as such and having successful completion of senior management course. Provided that if no suitable officer is available for promotion then by transfer of BPS-20 officer. <b>Note:</b> For the purpose of promotion, a joint seniority list of District Education Officers and additional directors (Male and Female) shall be maintained.

11

3. Deputy District Education Officer/Deputy Director (BPS-18) (Male and Female)

- i. M.Phil. in Education from recognized University with three years teaching or administrative experience in Government recognized educational institutions or offices;
- ii. at least Second Class Master's Degree or BS (four years) and Bachelor's Degree of Education from recognized University with five years teaching or administrative experience in BPS-17 and above in Government recognized educational institutions or offices; or
- iii. at least Second Class M.A/M.Sc with Second Class M.Ed/M.A (Education Planning and Management) or equivalent qualification from a recognized University with at least five years teaching or administrative experience in Government recognized educational institutions or offices.

25 to 45 years

- i. Financial Management
- ii. HR Management and
- iii. Information Technology

Provided that if no suitable officer is available for promotion then by transfer of BPS-19 officer.

(a) Eighty Percent by promotion on the basis of seniority, suitability and fitness from amongst the Sub-Divisional Education Officers and Assistant Directors (Male/Female) with at least five years service as such and such officers shall undergo six weeks post promotion training on following modules:

- i. Financial Management
- ii. HR Management and
- iii. Information Technology

Provided that if no suitable officer is available for promotion then by transfer of BPS-18 officer; and

(b) twenty percent by initial recruitment.

Sub-Divisional Education Officer/Assistant Director (BPS-17) (Male and Female)

- i. At least Second Class M.A/M.Sc or BS (four years) from recognized University
- ii. at least Second Class Bachelor's of Education from a recognized University and
- iii. three years teaching or administrative experience in Government recognized institutions or offices.

21 to 40 years

(a) Eighty percent by promotion on the basis of seniority, suitability and fitness from amongst the Assistant Sub-Divisional Education Officers and Assistant District Education Officers (Male/Female) with at least five years service.

Provided that if no suitable officer is available for promotion then by transfer of BPS-17 officer; and

(b) Twenty percent by initial recruitment.

2	District Education Officer Additional Director (BPS-19) Male and Female	.....	.....	By promotion, on the basis of seniority cum fitness, from amongst the Deputy District Education Officers and Deputy Director (Male & Female) with the least seven year services in BPS-18 or twelve year service in BPS-17 and above and such officer shall undergo six weeks post promotion training on the following modules, namely: i. Financial Management ii. HR Management; and iii. Information Technology Provided that if no suitable officer is available for promotion then by transfer of BPS-19 officer.
3	Deputy District Education Officer / Deputy Director (BPS-18) Male & Female	i. M.Phil in education from recognized university with three years teaching or administrative experience in Government recognized educational institutions or offices, or ii. At least second class master's degree of BS (Four years) and Bachelor's Degree of education from recognized university with five years teaching or administrative experience in BPS 17 and above in government recognized educational institutions or offices, or iii. At least second class M.A / M.Sc with second class M.Ed / MA (education planning and management) or equivalent qualification from a recognized university with at least five years teaching or administrative experience in Government recognized educational institutions or offices.	25 to 45	(a) Eight percent by promotion, on the basis of seniority cum fitness, from amongst the sub divisional education officers and assistant directors (male / female) with at least five year service as such and such officers shall undergo six weeks post promotion training on following modules namely: i. Financial Management ii. HR Management and iii. Information Technology Provided that if no suitable officer is available for promotion then by transfer of BPS-19 officer.  (b) Twenty percent by initial requirement.
4	Sub Divisional Education Officer / Assistant Director (BPS-17) (Male & Female)	i. At least second class M.A / M.Sc or BS (Four years) from recognized university. ii. At least second class Bachelor's of education from a recognised university and iii. Three years teaching or administrative experience in Government recognized institutions or offices.	21 to 40 years	(b) Eight percent by promotion, on the basis of seniority cum fitness, from amongst the sub Assistant Sub Divisional Education Officers and Assistant Directors (male / female) with at least five year service Provided that if no suitable officer is available for promotion then by transfer of BPS-17 officer; and  (b) Twenty percent by initial requirement



1

		<p>... Bachelor's Degree of Education with specialization in five years teaching or administrative experience in Government recognized institutions or office.</p>
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Note: On induction, all such officers shall undergo 5 weeks post induction training on the following modules, namely:

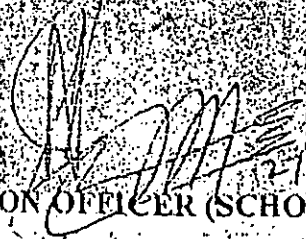
- i. Financial Management
- ii. HR Management and
- iii. Information Technology

**SECRETARY TO  
GOVERNMENT OF THE KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT**

Order No. & Date:

Copy forwarded to the:

1. All Administrative Secretaries to Govt. of Khyber Pakhtunkhwa.
2. Secretary to Governor, Khyber Pakhtunkhwa.
3. Secretary to Chief Minister, Khyber Pakhtunkhwa.
4. Chairman Khyber Pakhtunkhwa Public Service Commission, Peshawar.
5. Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
6. Directorate of Curriculum and Teachers Education Khyber Pakhtunkhwa Abbottabad.
7. All District Education Officers (Male) Elementary & Secondary Education Khyber Pakhtunkhwa.
8. Director Information Khyber Pakhtunkhwa Peshawar with the request to give wide publicity.
9. Manager Government Printing Press Peshawar for publication in the next issue of Govt. Gaz. III.
10. PS to Advisor to Chief Minister for Education Khyber Pakhtunkhwa Peshawar.
11. PS to Secretary E&SE Department, Khyber Pakhtunkhwa Peshawar.
12. PS to Special Secretary E&SE Department, Khyber Pakhtunkhwa Peshawar.
13. PS to Joint Secretary (Admin) E&SE Department, Khyber Pakhtunkhwa Peshawar.
14. PS to Deputy Secretary (Admin) E&SE Department, Khyber Pakhtunkhwa Peshawar.
15. All Section Officers E&SE Department, Khyber Pakhtunkhwa Peshawar.
16. Director E&SE Department with the request to upload the same on the web site of the department.

  
 21-03-19  
 SECTION OFFICER (SCHOOLS MALE)

12

**(BETTER COPY PAGE NO. 28)**

5	Assistant Sub Divisional Education Officer / Assistant District Education Officer (BPS-16) Male and Female	<ol style="list-style-type: none"><li>i. At lease second class Bachelor's Degree of BS (Four years) from recognized university.</li><li>ii. At lease, second class Bachelor's of education from a recognised university and</li><li>iii. Three years teaching or administrative experience in Government recognized institutions or offices</li></ol>	25 to 35 Years	By initial recruitment  Provided that if no suitable officer is available then by transfer of secondary school teacher (BPS-19) of teaching cadre Note: On induction, all such officers shall undergo six weeks post induction training on the following modules, nmely. <ol style="list-style-type: none"><li>i. Financial Management</li><li>ii. HR Management and</li><li>iii. Information Technology.</li></ol>
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**SECRETARY TO  
GOVERNMENT OF THE KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**

**Endst of Even No. & Date:**

**Copy forwarded to the:**

1. All administrative Secretaries to Govt. of Khyber Pakhtunkhwa.
2. Secretary to Governor, Khyber Pakhtunkhwa.
3. Secretary to Chief Minister, Khyber Pakhtunkhwa.
4. Chairman, Khyber Pakhtunkhwa Public Service Commission, Peshawar.
5. Directorate of Elementary & Secondary Education, Khyber Pakhtunkhwa. Peshawar.
6. Directorate of Curriculum and Teachers Education Khyber Pakhtunkhwa., Abbottabd.
7. All District Education Officers, (Male & Female) in Elementary & Secondary Education, Khyber Pakhtunkhwa.
8. Director Information Khyber Pakhtunkhwa. Peshawar with the request to give vide publicity.
9. Manager Government Printing Press Peshawar for publication in the enxt issue of Govt Gazette.
10. PS to Advisor to Chief Minister for E&SE Department Khyber Pakhtunkhwa., Peshawar.
11. PS to Secretary E&SE Department, Khyber Pakhtunkhwa, Peshawar.
12. PS to Special Secretary E&SE Department, Khyber Pakhtunkhwa, Peshawar.
13. PA to Additional Secretary (Estab) E&SE Department, Khyber Pakhtunkhwa Peshawar.
14. PA to Deputy Secretary (Admn) E&SE Department, Khyber Pakhtunkhwa Peshawar.
15. All Section Officers E&SE Department Khyber Pakhtunkhwa, Peshawar.
16. Director EMIS E&SE Department with the request to upload the same on the web site of the department.

**SECTION OFFICER SCHOOLS MALE)**

The District Education Officer.

Male Mansehra.

Subject: RELIEVING CHIT.

Memo

The service of Mr. Rafiq Javed (SST) ADSEO circle Mansehra is more required, as he has been frequently disobeying the orders of his superior and has many complaints in regard to his duties.

It is regrettable to note that ASDEO Circle Mansehra often failed to provide information well in time causing much problems to this Office from time to time. Information pertaining to provision of documents of all fresh appointees required by the Anti-Corruption) has been excessively delayed by the ASDO Circle Mansehra and this Office has to depend upon its own source in providing and finalizing the comprehensive report. A similar case has taken place in providing information on mutation deeds on School lands, which has been extraordinarily lingered on. Even such important information like rationalization was left to sink in deprivation, which was later communicated, through our own resources, by Whatsup. And, finally, delay in providing demand list for Books on behalf of circle is worth enough to speak of an utter inability/slackness of the ASDEO circle concerned.

The critical situation which needs to be explained that at many occasions, the ASDEO Circle Mansehra used to by-pass this Office and to make direct correspondence with Head Office, which is clear violation of Rules as well as against the Official method.

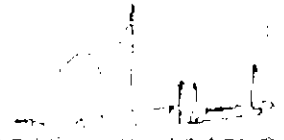
Besides the ASDEO Circle Mansehra has always been not cooperative owing lack of competency, resulting in unsmooth working of circle and thereby a constant headache to this Office.

  
09-08-2023

43  
Annex: 8, (14)

15

As a number of complaints have already been filed against ASD & D in Manshehra, bearing this Office letter Numbers 1793 dated 13.5.23, No. 1871 dated 31.5.23, No. 1873 dated 1.6.23 and No. 1673 dated 14.3.23, therefore, for various reasons, it is considered important to place him at the disposal of District Officer, Manshehra in the interest of Public Service with immediate effect.

  
SUB-DIVISIONAL EDUCATION OFFICER  
SUB-DIVISION MANSEHRA.

Copy No. 117 / 10 / 1 dated the 18 / 5 / 2023.

- 1. The District Districts Officer, Manshehra.
- 2. The ASD & D in Manshehra.
- 3. Office record.

  
SUB-DIVISIONAL EDUCATION OFFICER  
SUB-DIVISION MANSEHRA.

To

The District Education Officer  
Male, Mansehra

D (15)

Subject: RELIEVING CHIT AND ADDITIONAL CHARGE OF CIRCLE MANSEHRA.

Memo:

Kindly refer to your verbal directions the undersigned submitted as under:-

1. That SDEO male Mansehra has issued a relieving chit vide No. 97-100 dated 09/08/2023 subsequently an order of additional charge of circle Mansehra which has not been received to the undersigned officially uptill now. I received the same unofficially through a whatsapp by a friend ADO on personal request.
2. That the worthy SDEO male Mansehra is exercising the power and authority of the Honourable District Education Officer (Male) Mansehra without jurisdiction, against the law and policy of the Government for which he may be <sup>paralyz</sup> ~~paralyze~~ <sup>not</sup> by the competent authority. Under what law, rule he is/empowered to relieve an officer of BPS-16, whereas he himself is in BPS-16 and relieving the officer of the same scale in BPS-16?
3. That there is no law, rule to relieve a government servant without any legal posting/dismissal order by the competent authority under the law/rule after completing all the codal formalities.

(17)

blackmail and pressurize the undersigned which a cognizable offence under the law and the undersigned has reserves the right to persue the same in the competent court of law.

9. That since then the posting of the undersigned as ASDEO (Male) Mansehra the worthy SDEO Mansehra is continuously torturing the undersigned through different useless correspondence on the whims and wishes of the same blue eyed persons/hostile union group as narrated in detail in earlier correspondence attached herewith.

10. That the undersigned is an honest, hardworking and devoted officer and the above discussed use{less correspondence his badly affecting the performance of the undersigned and just a wastage of time. Under the supervision of the undersigned circle Mansehra is top in all the indicators and the same performance has been appreciated by the Deputy Commissioner Mansehra in DSC Meeting.

Therefore, in the light of the above stated facts and circumstances the relieving chit and subsequent order of handing over the charge of the circle may be set-aside being unlawful, without jurisdiction and against the facts in the interest of justice. Furthermore, it is humbly prayed that a comprehensive fact finding inquiry may be conducted in the matter through honest, unbiased, fair and competent officers of District Mansehra for the sake of justice once for all and to prove the factual position and also to penalized the black sheep in the education departments.

Dated: 26/08/2023

  
RAFIQ JAVED  
ASDEO Circle  
Mansehra

E (18)

OFFICE OF THE DISTRICT INSPECTOR GENERAL

**OFFICE ORDER**

Since SDEO (M) Mansehra has relieved Mr. Rafique Javed from circle Mansehra vide his No. 97-09 Dated 09-08-2023, and additional work over to Mr. Muhammad Hanif ASDOE (M) Circle Shabellin vide his No. 97-09 Dated 09-08-2023.

Since the work is suffering in the circle of the Mansehra due to the absence of SDEO as such to make service delivery effective and ensure the good governance in view the problem of circle Mansehra,

The following internal arrangement is hereby made in the circle Mansehra with immediate effect.

S#	Name & Desig:	From:
1.	Mr. Muhammad Akmal ADEO (Sport & Pvt School)	SDEO (M) Mansehra
2.	Mr. Muhammad Ramiz ASDEO (M)	SDEO (M) Mansehra

Note:

E 1 19



19

**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION**

**KHYBER PAKHTUNKHWA, PESHAWAR.**

**Notification:**

Consequent upon approved of the competent authority, Director of Elementary & Secondary education, Khyber Pakhtunkhwa, Peshawar transfer posting in respect of the following ADEOs, ASDEOs, SSTs are hereby order with immediate effect in the best interest of public service.

S#	Name & Designation	From	To Posted as	Remarks
1	Akmal Khan, SPET	GHS No. 2, Mansehra	ADEO Sports, Mansehra	
2	Muhammad Asad SPET	ADEO Sports Mansehra	Services place the disposal of DEO (M) Mansehra for further adjustment.	
3	Amir Shahzad (MC)	Acting SDEO Oghi Mansehra	ADEO circle Sherighar, Mansehra	
4	Khalid Shaheed SPET	ASDEO Shergar, Mansehra	Service placed at the disposal of DEO (M) Mansehra for further adjustment.	
5	Abdul Waris SST (G)	GHSS Shamdara Oghi, Mansehra	ASDEO Oghi Mansehra	
6	Zia Iqbal SST (G)	ASDEO Oghi Mansehra	Services placed at the disposal of DEP (M) Mansehra for further adjustment.	

**Note:**

1. Posting / Adjustment of Teaching Cadre Officer shall be considered as stop gap arrangement till the arrival of management cadre officer.
2. The order of the above mentioned teaching cadre officer will be effective subject to the condition that they will give an undertaking affidavit on legal paper stamp paper to DEO (M) Mansehra the effect not to claim seniority of Management cadre.
3. Charge report should be submitted to call concerned.
4. No TA/DA is allowed.
5. The terms and conditions mentioned in their appointment order as teaching cadre will remain intact.

Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa

Endst. No: 2566-70/F No. M-2 Transfer Manserhra Dated: the Peshawar 31/03/2023

**Copy forwarded to the:**

1. District Education Officer (M) Mansehra.
2. District Account Officer Mansehra
3. Principal Concerned.
4. SST. Concerned.

36

F (20)



**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)  
DISTRICT MANSEHRA**

Phone # 0997-382271 Fax # 0997-382244  
E-mail Address: [edoedu\\_mansehra@yahoo.com](mailto:edoedu_mansehra@yahoo.com)  
Facebook Page: [www.facebook.com/DEOMMANSEHRA](http://www.facebook.com/DEOMMANSEHRA)

No 7721 Date 29/8/2023

**ADJUSTMENT**

Consequent upon the relieving of Mr. Rafique Javed Ex ASDEO (M)/SST-G (Teaching Cadre) by the SDEO (M) Mansehra from the post of ASDEO (M) Circle Mansehra vide his No.97-09-Dated 09-08-2023 and additional charge has been handed over to Mr. Muhammad Hanif ASDEO (M) Circle Shahelia vide his No. 128 Dated 21-08-2023. Since his services has been placed at the disposal of DEO (M) Mansehra as such being surplus he is adjusted as SST-G at GHSS Parhinia Mansehra against vacant post of SST-G with immediate effect in the best interest of public.

Note:-

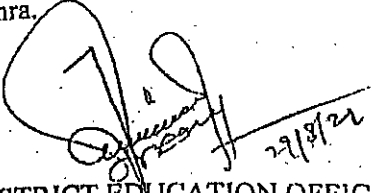
1. No. TA/DA is allowed.
2. Charge report should be submitted to all concerned.

Sd/-  
DISTRICT EDUCATION OFFICER  
(MALE) MANSEHRA

Endst: No. 7721-24 Estt: (M) Trf: /Dated Mansehra the 29/8/2023.

Copy forwarded to the:-

1. PA to Director E&SED Peshawar
2. Principal & SDEO (M) Mansehra.
3. District Accounts Officer Mansehra.
4. Teacher concerned.

  
DISTRICT EDUCATION OFFICER  
(MALE) MANSEHRA

خدمت جناب ڈائریکٹر صاحب ایجنڈی اینڈ سیکنڈری ایجوکیشن خیبر پختون خواہ پشاور

حکماند اپیل بر خلاف آرڈر 7321 مورخہ 29 اگست 2023ء بجاریہ ڈسٹرکٹ ایجوکیشن آفیسر مانرہ جس نے نئے وقت سے بدولت اختیارات سے غید قانونی طور پر اور بدینہ پیر مبنی ریلیونگ سے چھٹے جو ذاتی عناد اور بددیانتی کی غرض سے ڈویژنل آفیسر کیلئے 16 تے اپیل سے کیلئے 16 کی بابت جاری کی جیسے بنیاد بنا کر غید قانونی طور پر بدولت اختیارات سے لغیر کسی انکوائری نوٹس یا اپیل سے کی شواہد کرنے کے محض ذاتی مفاد حاصل کرنے کی غرض سے اور اپنے ہندوئے شخص سے کو اپیل سے کی جگہ ایڈجسٹ کرنے کیلئے اپیل سے کو سرکل مانرہ سے ٹرانسفر کر کے دور دراز گورنمنٹ سے یا تری سیکنڈری سکول سے پٹیوئے ٹرانسفر کر دیا

جناب عالی: حکماند اپیل ذیل عرض ہے

(1) یہ کہ اپیل سے نے حکم تعلیم میں بطور این۔ این۔ ٹی جنرل ٹیچنگ کینڈر میں سرکل سرانجام دینے سے اپنے سرکل نہایت سے اعانتداری فونش اسلوبی اور ملن سے سرانجام دی اور بہترین استاد کا اور ڈھانسل کرتے کے ساتھ میٹرک کے کاسٹ انداز روٹ سے دینے پر اپیل سے کو وزارت سے میں شاندار کارکردگی کا سند سے کو انزا اور تیس انتظام بھی دیا گیا

(2) یہ کہ اس وقت کے ڈائریکٹر ایجنڈی اینڈ سیکنڈری ایجوکیشن خیبر پختون خواہ پشاور نے اپیل سے کا ٹیچنگ کینڈر میں شاندار کارکردگی کو مدنظر رکھتے ہوئے اپیل سے کو تبدیل آرڈر 37-1199 مورخہ 17 فروری 2023ء کو اپیل سے سے ڈویژنل آفیسر (مدد خانہ) مانرہ تبدیل ٹرانسفر ایڈجسٹ کرنے کا آرڈر صادر کیا اور بعد ازاں تبدیل آرڈر 63-6061 مورخہ 22 اپریل 2023ء کو اپیل سے سے ڈویژنل آفیسر مانرہ میں ٹرانسفر کیا



(3) یکری ایڈیٹس نے جس طرح ٹیکنیکل کیڈر میں انتہائی سخت ونگن سے ڈیوٹی سرانجام دینے پوچھے اور ڈیوٹی حاصل کرنے کے ساتھ ٹیکنس انعام حاصل کی اس طرح منجھٹ کیڈر میں بھی اپنی کاوشوں کے نتیجے میں کامیاب ہوئے سرکل مانزہ میں 2023-24 سیشن کو سیشن میں سکولوں میں داخل کروایا گیا۔ تاہم عام سرکلز میں اس سیشن میں اپنے بچے سکولوں میں داخل نہ ہونے کے باعث ڈیوٹی عذر مانزہ نے اپیلٹے کو قیامی خدمات کے کارکنوں کو بہتر بنانے کا بناؤ پر تقریباً سرٹیفکیٹ جاری کیا۔

(4) ایکری ایڈیٹس کی لٹینائی بطور ایڈیٹس سے ڈیوٹی نرل ایجوکیشن آفیسر سرکل مانزہ ایڈیٹس کا کارکنوں اور دیانتہ داری سے SDEO سرکل مانزہ کے فوٹس ہونے کے لئے روز ایڈیٹس کے یہ مسائل پیدا کرنے چلے آ رہے ہیں جن کے ساتھ آئیے بل دیانتہ ٹیکنیکل نہیں گروپ ہے جو ایڈیٹس سے دیانتہ، دارشمن کے کو برداشت نہیں کرتے جن لٹس بنائے SDEO سرکل مانزہ کر رہے ہیں۔

(5) ایکری ایڈیٹس نے گورنمنٹ پرائمری سکول مدد اتر سرور آباد کا دورہ کیا اور سکول مذکور میں اساتذہ کا تعلق اسما بد دیانتہ پوٹس گروپ سے جن کا ڈاکٹر ایڈیٹس نے فزہ سے 4 مہینے جن سے سامانے کی تسلیل کی گئی ہے پوٹس سامانے کی تسلیل سے اختیار ایڈیٹس کے حق اور لفیڈر ایڈیٹس کی اجازت کے سامانے کی تسلیل کیا گیا۔ لہذا ایڈیٹس نے مذکورہ اور دیگر کرائسٹن کی گنت لاک ٹک میں تحریر کیا تو کرائسٹن کو چھپانے کی غرض سے علیہ قانونی طور پر مذکورہ سامانے کو stuck off اپنے دوست اور شاہ این۔ ڈی۔ او مانزہ سے مل کر کرنا ایڈیٹس قانون مذکورہ سامانے stuck off نہیں کیا جاسکتا تھا اور ایسی کرائسٹن چھپانے کا عمل سے اور اپنے آپ کو e سے کرتے تیلے بلو 27-80 روپے کی نیلہ ریستہائی کم دہوں میں اور لفیڈر سے اعلیٰ لٹس کی اجازت اور لفیڈر اختیار

(6) یہ کہ دیانت ٹیپر کوئین نے اپیلٹے سے بدلہ لینے کا عرض سے سب سے ڈویژنل  
 ایجوکیشن آفیسر مانرہ کے ساتھ مل کر کیا کرتے تھے۔ ڈویژنل ایجوکیشن  
 آفیسر سے اپیلٹے کی نسبت جوٹل من گھڑتے بے بنیاد تھیاتی تحریر کروا کر  
 دیپورنگ کے پٹے ڈسٹارٹ ایجوکیشن آفیسر مانرہ کو ارسال  
 کروائی گئی تھی۔ وہاں دعوے کا بھی تعلق نہ ہے۔ اور ڈسٹارٹ  
 ایجوکیشن آفیسر مانرہ نے جوٹل من گھڑتے بے بنیاد تھیاتی تحریر دیپورنگ  
 پٹے کا بنیاد پر اپیلٹے کو *Explanation* لیکر جاری کیا جس کا اپیلٹے  
 نے جواب دیا اور ٹیپر کوئین نے اپیلٹے کو سواہتے کا رویہ لکھتے تھے جن  
 کا بھی اپیلٹے نے ٹیپوں کے ساتھ جواب دیا اور اسی طرح ٹیپر کوئین  
 ایجوکیشن آفیسر مانرہ نے اپیلٹے کو ایک ویکل لیکر جاری کیا جس کا اپیلٹے  
 جواب دیتے ہوئے گزارش کی کہ اس معاملے کی انکواری کروائی جائے  
 نام واضح ہو کہ فقور وار کون ہے لیکن جان بوجھ کر انکواری میں کوئی  
 شخص کو نام فقور وار نہ دیانت ٹیپر کوئین اور سب سے ڈویژنل ایجوکیشن  
 آفیسر اس طرح سب ڈویژنل ایجوکیشن آفیسر نے بد دیانت ٹیپر کوئین  
 سے مل کر ہتکت کر کے اپنے آپ کو *Safe* کرنے کی مرض سے ڈسٹارٹ ایجوکیشن  
 آفیسر مانرہ کو *Believing* باری کروانے اور ڈسٹارٹ ایجوکیشن آفیسر  
 نے بغیر معاملے کی انکواری کروانے کے یا بغیر اپیلٹے کو کوئی ٹیپ جاری  
 کرنے کے یا اس کے شواہد کرنے کے غیر قانونی طور پر العاف و قانون کے  
 اصولوں کو پامال کرتے ہوئے اپنے من پسند شخص کو اپیلٹے کا جگہ پر لیا  
 ڈائریکٹ کر کے یہی بدوں اختیارات اپیلٹے کے تبارے کا  
 آرڈر صادر فرمایا جو غلط ہے اور ناقابل بحالی ہے اور قابل مستحق ہے

(7) یہ کہ اپیلٹے کے تبارے کا آرڈر جو ہت ذیل ناقابل بحالی ہے اور قابل مستحق ہے  
 وہ یہ کہ اپیلٹے کیس نمبر 16 کے تبارے کا آرڈر *SDE* کیس نمبر 16  
 کی بددیانتی پر مبنی دیپورنگ کے پٹے کی تھیاتی تحریر کیا جو غلط اور ضلوعے قانون ہے  
 کیونکہ *SDE* نڈر سے فوڈ کیس نمبر 16 میں تصدیق ہے جو اپیلٹے کا نمبر 46

ب۔ یہ ریپر اپیلنٹ کے کاغذ پر ہی بطور ASDE اور اسٹیٹ ڈویزنل ایجوکیشن آفیسر  
 ہوا ہائی ڈیگریڈڈ ٹیچر کے نام کو حاصل میں ڈیڑھ گھنٹہ کے ایجوکیشن  
 آفیسر (مددگار) مانرہ اور اس کے ذریعہ اس کے اختیار سے ہی ہوا ہئی۔  
 ڈیگریڈڈ ٹیچر کے نام کو حاصل میں ڈیڑھ گھنٹہ کے ایجوکیشن آفیسر  
 ایجوکیشن آفیسر مانرہ کا جائزہ سے اپیلنٹ کے تبادلے کا آرڈر  
 عند صلح سے قانون سے اور بدولت اختیار سے ہونے کا وجہ سے ناقابل  
 بحالی ہے اور قابل منوفی ہے۔

ج۔ یہ آرڈر مذکورہ الفاظ کے قانون کے لفظوں کے کو پایا جائے کہ  
 جوئے لکھنؤ ایجوکیشن آفیسر کے کاغذ پر ہی مانرہ سے  
 کیا گیا ہے (یہ آرڈر کا گنتہ نہ ہونے سے قانون کے حکم کے  
 تحت ہی ہے منوفی ہے)۔

د۔ یہ آرڈر مذکورہ لحاظ سے قابل منوفی ہے کیونکہ اپیلنٹ نے  
 خود کو انکواری کا آفیسر ہی لکھا ہے لہذا اپیلنٹ کے کاغذ پر ہی  
 آرڈر مذکورہ جاری ہوا ہئی۔

ن۔ یہ آرڈر مذکورہ ملکی جگہ سے زانیہ بناد اور کرائی میں ملوث افراد  
 کا راجہ کے احکام سے منوفی کرنے کے عزم سے کیا گیا ہے جو کہ  
 سے عند صلح اور قابل منوفی ہے۔

اسد کا صمیم اپیلنٹ کے تبادلے کا آرڈر منوفی و ماکر  
 اپیلنٹ کے کاغذ پر ASDE کے نام سے 22/11/2014 کو ایجوکیشن  
 آفیسر کے تبادلے کا

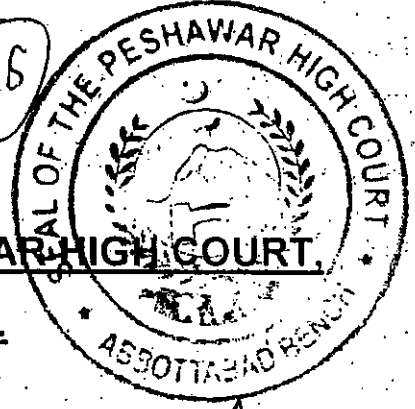
انٹیم 23/11/2014

صدر دفتر ایجوکیشن ڈویزنل ایجوکیشن آفیسر سرکار مانرہ  
 0300911714

30/11/2014

H  
25  
**BEFORE THE HONOURABLE PESHAWAR HIGH COURT,**

**ABBOTTABAD BENCH.**



**W.P. No. 1125-A /2023**

Muhammad Rafique Javed ASDEO Circle Mansehra.

...PETITIONER

**V E R S U S**

1. Secretary to Government of Khyber Pakhtunkhwa, Elementary and Secondary Education, Department Peshawar.
2. Director Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Male) Mansehra.
4. Sub-Divisional Education Officer Sub-Division Mansehra.

...RESPONDENTS

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WRIT PETITION UNDER ARTICLE 199 OF THE CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN, 1973 AS AMENDED UP-TO DATE FOR DIRECTION TO RESPONDENTS TO DECIDE THE DEPARTMENTAL APPEAL OF THE PETITIONER, WHICH IS PENDING BEFORE RESPONDENT NO.2.

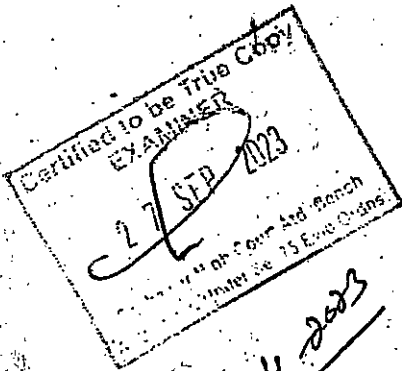
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**PRAYER:**

**ON ACCEPTANCE OF INSTANT WRIT PETITION, RESPONDENT NO.2 MAY GRACIOUSLY BE DIRECTED TO DECIDE THE**

**FILED TODAY**

ADD: REGISTRAR  
PHC, ABBOTTABAD BENCH  
(10) 011



5-1614-2023

26

DEPARTMENTAL APPEAL OF THE PETITIONER WHICH IS PENDING BEFORE RESPONDENT NO.2. ANY OTHER RELIEF WHICH THIS HON'BLE COURT DEEM FIT AND APPROPRIATE MAY ALSO BE GRANTED TO THE PETITIONER IN THE BEST INTEREST OF JUSTICE.

*Respectfully Sheweth,*

*That the facts giving rise to the present Writ Petition are as under:-*

1. That the petitioner while serving as SST General in the Teaching cadre performed his service very honestly and gracefully, as a result of which petitioner was not only awarded the best teacher award but also was given a cash reward.
2. That the then Director Schools and Literacy Education Department, KPK Peshawar keeping in mind the excellent service of the petitioner in teaching cadre adjusted the petitioner as a ASDO Phulra by transfer order dated 17.02.2020 and subsequently on 22.04.2021 he

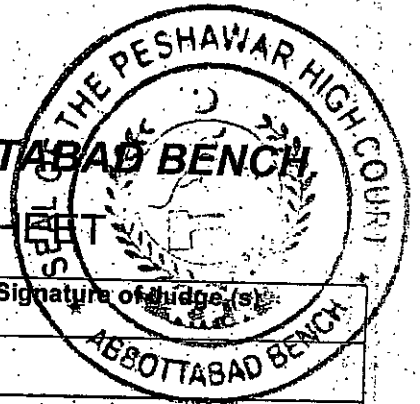
FILED TODAY

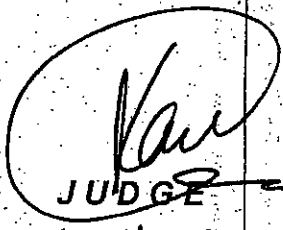

ADD. REGISTRAR  
P.C.C. ABUDDUDDIYAH BENTEN  
10/9/21



27

**PESHAWAR HIGH COURT, ABBOTTABAD BENCH**  
**FORM OF ORDER SHEET**



Date of Order of Proceedings	Order or other Proceedings with Signature of Judge (s)
1	2
26.09.2023	<p><b><u>WP No. 1125-A/2023</u></b></p> <p>Present: Sardar Muhammad Azeem, Advocate, for the petitioner.</p> <p style="text-align: center;">***</p> <p><b><u>KAMRAN HAYAT MIANKHEL, J.-</u></b> Through the instant petition, filed under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973, the petitioner has sought the following relief:</p> <p style="padding-left: 40px;"><i>"It is, therefore, humbly prayed that on acceptance of instant writ petition, respondent No.2 may graciously be directed to decide the departmental appeal of the petitioner which is pending before the respondent No.2. Any other relief which this Hon'ble Court deem fit and appropriate to the circumstances may also be granted to the petitioner in the best interest of justice".</i></p> <p>2. At the very outset, learned counsel for the petitioner stated at the bar that petitioner would feel satisfied, if direction is issued to respondent No.2 to decide the appeal of the petitioner pending before it, within a stipulated period.</p> <p>3. In view of the above, this petition is disposed of with direction to respondent No.2 to decide the appeal of the petitioner positively within a period of one (01) month from the date of receipt of this order.</p> <div style="text-align: right; margin-top: 20px;">   <b>JUDGE</b>    <b>JUDGE</b> </div>

Copy  
 27 SEP 2023  
 Peshawar High Court Abd. Bench  
 Registered Under Sec. 75 Evad Ordms.



I (28) 112

**DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION**  
**KHYBER PAKHTUNKHWA PESHAWAR.**

**NOTIFICATION**

1. WHEREAS, DEO (M) Manshira transferred Mr. Rafique Javed SST from ASDEO (M) Circle Manshra to GHSS Parhinna Manshra vide order No. 7721 dated 29-08-2023.
2. Whereas, feeling aggrieved Mr. Rafique Javed under transfer to GHSS Parhinna Manshra filed writ No. 1125-A/2023 before Peshawar High Court Abbottabad Bench.
3. Whereas, the Honorable Court referred the matter to this office for decision within one-month vide judgment dated 26-09-2023.
4. Whereas, this office called DEO (M) Manshra and the petitioner for Personal Hearing at this office dated 20-10-2023 vide letter No. 325 dated 17-10-2023, which they did accordingly.

Now therefore, in exercise of powers conferred upon the Director (Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar) being Competent Authority, is pleased to regret the appeal in r/o Mr. Rafique Javed Ex-ASDEO (M) Circle Manshra under Appellant Rules, 1986 in the best interest of public Service.

**DIRECTOR**  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar

5597-5601  
Endst.No: 5597-5601 /F.No. 447/SST(M)/Complaints/Manshra Dated 8/11/2023

Copy forwarded for information to the:-

1. Registrar Peshawar High Court Abbottabad Bench w/r to the judgment dated 26-09-2023 W.P No. 1125-A/2023.
2. District Education Officer (Male) Manshrara.
3. District Accounts Officer District Manshra.
4. Mr. Rafique Javed Ex-ASDEO (M) Circle Manshra.
5. P.A, to Director Elementary & Secondary Education, Local Directorate, Peshawar.
6. Master File.

Assistant Director (Establishment)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar



Better copy  
I 28

112

**DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA PESHAWAR.**

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**DIRECTOR**  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar

5597-5601  
Endst: No. 5597-5601 /F.No. 447/SST(M)/Complaints/Manshra Dated 8/11/2023  
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1. Registrar Peshawar High Court Abbottabad Bench w/r to the judgment dated 26-09-2023 W.P No. 1125-A/2023.
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4. Mr. Rafique Javed Ex-ASDEO (M) Circle Manshra.
5. P.A. to Director Elementary & Secondary Education, Local Directorate, Peshawar.
6. Master File.

Assistant Director (Estab-M-I)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar

%  
to



J (29)  
Computer Lab: 0997-920134  
D.A.O, Audit Wing & FRC: 0997-920135  
Treasury Wing: 0997-920136  
Additional D.A.O: 0997-920138

## DISTRICT ACCOUNTS OFFICE, MANSEHRA.

No. DAO-MA/PR-II/Admn/2023-24/ 53-55

Dated: 22.09.2023

To: The Sub-Divisional Officer,  
Mansehra.

Subject: RECONCILIATION OF EXPENDITURE FOR THE MONTH OF AUGUST 2023  
DDO CODE MA-6320

Memo,

Reference your letter bearing No. 256 dated 14.09.2023 on the subject cited above.

The under reference Sour-2 Form submitted for pay inactivation of Mr. Rafiq Javid ASDEO bearing personal number No. 224940 was returned unpassed with the valid observation that "Order of the competent authority for relieving and deptt proceedings may be shared with this office". This office regret to inform that there is no provision in the Rules for stoppage of an employee's pay except on attachment by court of law, transfer from one district to another, resignation from service, death or retirement and termination or dismissal from service. If however, an employee is ceased to be a good Government Servant or in involved in any unlawful activity necessitating disciplinary action, proceeding ought to be initiated by the departmental authority under Efficiency & Disciplinary Rules. Whereas no valid grounds were recorded in Source Form or shared with this office hence the pay inactivation of the officer concerned is against the standing instructions besides rulings of the apex court.

It is therefore requested that the following clarifications are required from the end of SDEO (M) office in the matter.

- 1) Weather the officer was proceeded or convicted under Efficiency & Disciplinary, 2011 before the submission of Pay Inactivation Form or otherwise?
- 2) Weather SDEO (M) Mansehra is rested with necessary powers to relieve an officer of BPS-16 without assigning valid grounds?
- 3) Weather adjustment order of the DEO (M) Mansehra vide No. 7721 dated 29/08/2023 was signed by the concerned officer or his immediate subordinate or otherwise?

It is further added that the order of adjustment of the ASDEO is not valid as the Director E&SE KPK is competent to issue transfer /adjustment orders of the ASDEOs as per prevailing practice as is evident vide Para-2 of the letter under reference and posting orders issued by Director E&SE KPK vide his No 3024-26 dated 26/02/2020 and No. 1133-37 dated 17/09/2020 & No. 6061-63 dated 22/04/2021 wherein adjustment order of the ASDEO's were issued by the Director E&SE KPK.

It is also pertinent to mention here that under the provision of Para 89 (4) viii of General Financial Rules Volume-I "The head of department and the Accountant General (District Accounts Officer), will be jointly responsible for the reconciliation of figures given in the accounts maintained by the head of department with those that appear in the Accountant General's books, the reconciliation should be made on monthly basis". Hence, this office is of view that being the DDO SDEO (M) Mansehra cannot negate his responsibility of reconciliation under the rules quoted above please.

  
District Account Officer  
Mansehra.

Copy for information to

- 1) The Director Elementary & Secondary Education Peshawar.
- 2) The DEO (M) Mansehra

District Accounts Officer  
Mansehra



Office of the  
**DISTRICT ACCOUNTS OFFICER**  
**MANSEHRA**  
Phone # 0997-920135

30

No:DAO/MA/2022-23/80-84

DATED 03.10.2023

The District Education Officer (Male)  
Mansehra.

**SUBJECT: CONFIRMATION OF ADJUSTMENT ORDER.**

Memo.

Find enclosed herewith a copy adjustment order bearing No. 7721 dated 29.08.2023 whereby Mr. Rafique Javed, ASDEO has been transferred and adjusted against the post of SST (G) at GHSS Parhinna, Mansehra. The order, ibid, appears having been signed in "for". Moreover signature appearing on said order not matches with signature of DEO & Dy. DEO.

2. Therefore, it is requested that confirmation or otherwise of the status of the adjustment order, may be conveyed to this office enabling to proceed further in the matter.

3. It is further added that the order of adjustment of ASDEOs is within the competency of Director E & SED, Khyber Pakhtunkhawa. The instant case apparently, seems based on administrative grounds. Therefore, approval of competent authority to the action taken by SDEO (M) Mansehra and endorsed by you, needs to be obtained in due course of time.

DISTRICT ACCOUNTS OFFICER  
MANSEHRA

Copy to:

- i) Director (E & SED), Khyber Pakhtunkhwa, Peshawar.
- ii) SDEO (M), Mansehra.
- iii) Principal, GHSS Parhinna, Mansehra.
- iv) ✓ Mr. Rafique Javed, ASDEO

DISTRICT ACCOUNTS OFFICER  
MANSEHRA

**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MANSEHRA**

Phone # 0997-382271 Fax # 0997-382244  
E-mail Address: [gdoedu\\_mansehra@yahoo.com](mailto:gdoedu_mansehra@yahoo.com)  
Facebook Page: [www.facebook.com/DEOMMANSEHRA](http://www.facebook.com/DEOMMANSEHRA)  
Dated: 28 / 03 / 2023



No. 2619 / 1

To

The Mr. Muhammad Rafique Javed,  
ASDEO Circle Mansehra,  
Sub Division Mansehra.

K

31

Subject: EXPLANATION

Memo:-

Reference to the subject cited above and to state that the GPS Mundhar was re-opened in the month of September 2022. As per the report of Sub Divisional Education Officer (M) Mansehra, you have neither visited the said school nor submitted any report regarding enrollment/functioning of the school. It seems you are not taken interest in functionalization of this school. It shows great negligence and in-efficiency on your part, reflecting non-professional attitude/behavior.

You are therefore directed to submit a comprehensive report with solid proof within 07 days positively otherwise you will be proceeded under E&D revise rule 2011.

-Sd-

DISTRICT EDUCATION OFFICER  
(MALE) MANSEHRA

Endst No 2620-21 / 1

Dated 28 / 3 / 2023

Copy for information to:

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. SDEO (Male) Mansehra District Mansehra.
3. Office Record.

DY: DISTRICT EDUCATION OFFICER  
(MALE) MANSEHRA

I have received  
Explanation hard copy  
received to day  
Date 31/3/2023

To

The District Education Officer,  
(Male) Mansehra.

Annexure (32) (4)

Subject: REPLY TO EXPLANATION LETTER NO. 2619, DATED 20  
2023

Memo:-

Kindly refer to the subject cited above the requisite reply is submitted as under.

1. That the report of the SDEO referred in the instant explanation is not based on facts rather based on malafide intentions whose complete detail is hereby submitted separately for facts finding enquiry and to proceed under the service law to safeguard the future of the innocent students/institutions /departments as well.
2. That the under reference school GPS Mundhar (EMIS Code 17629) had been closed much prior to the arrival/charge of the applicant as ASDEO Circle Mansehra.
3. That the aforementioned school was reopened on the direction of the then DEO (M) Mansehra through SDEO Tehsil Mansehra on 19 September 2022 without any information's/instructions to the undersigned (Copy of attendance register showing the same facts appended herewith for perusal please).
4. That erroneously the posting order of Mr. Rasheed Muhammad (PSHT) was issued on 19 September 2022 at GPS Lunde Mundhar instead of GPS Mundhar Mansehra. It is pertinent to mention here that the matter of reopening of that referred School came into the knowledge of replicant on 01-10-2022, when the undersigned visited the CPD center GPS Attarshesha, where there Mr. Rasheed Muhammad was attending the CPD training and he informed that he has been posted as PSHT GPS Lunde Mundhar instead of GPS Mundhar being a surplus teacher in circle Shehli. He further informed that his corrigendum order is in process with DEO (M) office which was issued latter on with back date.
5. That it's worth mentioning here that the undersigned visited GPS Mundhar on 03-10-2022 and Mr. Rasheed Muhammad was present in the School, but his corrigendum Order was pending with the DEO (M) Office, further more on dated 05-10-2022 Mr. Ishtiaq Ahmed the then SDEO concerned visited the School, the corrigendum Order was issued to the concerned teacher after 05-10-2022 with back date (Copy of attendance register showing the same facts is attached herewith for ready reference please).

- 33
6. That, similarly the undersigned also paid joint visit on 15-12-2022 along with the concerned SDEO honorable Mr. Anwar Shah Sab on my personal Car No. 927 (Islamabad) he put his signatures along with my signature and then wonderfully submitted a fake/concocted report to your good self (Copy of attendance register of GPS Mundhar reflecting the same fact is annexed herewith for further disciplinary action against the officer for wrong reporting on the basis of personal grudges/liking disliking, more over report of the teacher concerned regarding the same facts is also attached herewith for further legal action please. Along with copy of attendance register reflecting the joint visit of the office concerned is also attached herewith proving the report is wrong.
  7. That on 10-03-2023 the School leader visited the concerned School and reported that the head teacher was present in the School and enrolment was seven and which could be increased upto forty he further reported that due to the evening supports activities in the school, the inhabitants are reluctant to admit their children.
  8. It is pertinent to mention here that academic session of Government School starts w.e.f March, April where the enrolment campaigns is initiated.
  9. That similarly undersigned visited the said school on 25-03-2023 and reported to the worthy SDEO immediately on the same day verbally and then was sending the written report but meanwhile the concerned SDEO submitted the adverse report of the undersigned incorrectly (Copy of the visit report appended herewith please).
  10. It is worth mentioning here in my thirty years service it is the first explanation served by your good self on the basis of a wrong/fake/concocted report of the worthy SDEO based on personal grudges in collusion with wrong order companions, which mentally tortured/disturbed me.

It is therefore in the light of above stated facts and circumstances the instant explanation, may please be filed in the interest of the justice.

Date: 31-03-2023

Rafique Javed  
ASDEO Circle Mansehra,  
Sub Division Mansehra.

31/3/23



جسٹریٹری بلڈین گورنمنٹ روڈ لاہور سیکول منڈیاں سرسہ ضلعہ  
 بابت ماہ اکتوبر 2022

روز	PMT			PMT			روز
	آمد	دستخط	رواگی	آمد	دستخط	رواگی	
1							
2							
3				1-35			8-30
4				1-35			8-30
5				1-35			8-30
6				1-35			8-30
7				12-00			8-30
8				1-35			8-30
9				SUNDAY			
10				1-35			8-30
11				1-35			8-30
12				1-35			8-30
13				1-35			8-30
14				12-00			8-30
15				12-00			8-30
16				SUNDAY			
17				1-35			8-30
18				1-35			8-30
19				1-35			8-30
20				1-35			8-30
21				12-00			8-30
22				12-00			8-30
23				SUNDAY			
24				1-35			8-30
25				1-35			8-30
26				1-35			8-30
27				1-35			8-30
28				11-30			8-30
29				1-35			8-30
30				SUNDAY			
31				1-35			8-30
میزان	مال	سابقہ	میزان	مال	سابقہ	میزان	مال

ASBEO  
 3/10/2022

SDEO  
 5/10/2022

(2)

# لاگ بک (حصہ دوم)

35

رپورٹ کی روشنی میں سکول انتظامی نے جو کارروائی کی	راہنما رپورٹ معائنہ	سکول انتظامی کی
	<p>نتیجہ امتحان 4 PS فیڈ بک 6 و 9</p> <p>طریقہ کار 4 PS</p> <p>مہینہ مارچ 2022</p> <p>دوبارہ سکول کا SDEO</p> <p>13 مارچ 2022</p> <p>13</p> <p>گھنٹوں</p> <p>برائے</p> <p>ASDEO</p> <p>19/4/2022</p>	<p>19/11/2022</p> <p>SDEO</p> <p>Mea</p> <p>30-3</p>





# لاگ ایک (حصہ دوم)

پورٹ کی رپورٹ میں سکول اتھارٹی

رابعہ رپورٹ معائنہ

پورٹ کی رپورٹ میں سکول اتھارٹی نے جو کارروائی کی

25/3/2023

آج اجلاس میں حضور صاحبہ کا وزٹ

کیا ہو گیا ہے اور کیا ہو گا

اور آئی ڈی اور اسی اہمیت پر

میں انجام دے رہے ہیں ایک

بجہ سے جس سے آئی ڈی طالب علم

ہے۔ یہ سب سے بہتر ہے کہ جو

ماتریکل کے اس وقت میں نہیں آئے

اور وقت لگا کر بتایا کہ اس وقت

ایسا کرنا ہی وہی ہے جس کا اہمیت ہے

اسی اہمیت کے لئے یہ ہے۔ لہذا

میں سب کو مراد دیا جاتا ہے جس کے

کے اہمیت میں ہے جس کے اہمیت میں ہے

25/3/2023

39

# لاگ بک (حصہ دوم)

8/9/19

انتظامی

رپورٹ کی روشنی میں سکول انتظامی  
نے جو کارروائی کی

راش / رپورٹ معاہدہ

آج صرف 03/2019 کو حسب یادگراں رہے ہیں

میں سالانہ معاہدہ عمل میں لایا گیا

اصل مدرس زاید خان عبد نایب دلفراز احمد

حاضر ہیں جو پورار کا دوست خان ہے

دفعہ 03/03 ، سوشل 03/03 ، چارج 03/03 ،

اصل اعلیٰ 03/03 ، اصل روزہ 03/03 ،

داخل عادتہ 1112 ، 1117

1112 ، 1117

بلا رپورٹ بعد از پڑتال دوستانہ

عادتہ مدرس سرکار ہے جو کہ وہ کفالت پر مشتمل ہے

سکول عذا میں 03 کو عادتہ مدرسہ دفتر پر مشتمل ہے

اور سکول میں بنیاد پر عادتہ مدرسہ

تمام عادتہ مدرس کے طلباء کا تعلیمی جائزہ لیا گیا

کی تعداد کم ہے مگر اساتذہ نے کافی محنت کی ہے

جو بہتر بنانے کے لیے کوشش کی ہے۔ طلباء کا جائزہ بہتر

گیا۔ اصل مدرسہ میں عادتہ مدرسہ کے تعاون حاصل ہے۔

اور وہ سائنس ماحول میں ترقی عمل جارہے ہے

تمام عادتہ مدرسہ کے اساتذہ کے سالانہ جائزہ کی

*(Handwritten signature and scribbles)*

Project of Chiragh Uloomik Complex  
0300-56189240  
انتظامی

## Enrollment for the Session 2023-24

Circle	Total
KAGHAN	
BALAKOT	
GARHI HABIBULLAH	
DHOHIAL	374
BAFFA	389
KHAKI	1261
PHULRA	1638
OGHI	1934
DARBAND	2012
SHERGARH	5153
SHAHELIA	5486
HANGRAI	6429
BATTAL	7632
MANSEHRA	9058

9

**OFFICE OF THE ASSISTENTSUB DIVITIONAL EDUCATION OFFICER CIRCLE MANSEHRA**

No.                     

Dated 16/6 /2023.

41

To

The Dy: District Education Officer  
(Male) Mansehra.

Subject: **REPLY ISSUE OF RENTED BUILDING OF GPS NO. 1 MANSEHRA.**

Sir,

Consequent upon your official later No. 5637(Estt :( M)F.No.1/ Dated 17-2023, retarding issue of rented building of GPS No. 1 Mansehra.

Respected sir, the undersigned have informed SDEO (M) and also directed the Head Teacher time and again regarding the notice of building owner, but no one took it serious. The undersigned also met and discussed the matter with local PTC/Local bodies' members but nobody is willing to provide any assistance in this matter. The undersigned has also discussed the matter with our SDEO (M) Mr. Syed Anwar Shah the matter was in his notice and upon my request. He visited the school on 13-06-2023, but he doesn't issued any direction to Head Teacher in this regard. (Copy of log book is annexed have for ready reference). He also visited on 23-6-2023 and then he directed Head Teacher to arrange any suitable building.

Respected sir, it may be in your kind notice, this area is commercial area of Mansehra city, and the undersigned had tried to manage new building as though it is the responsibility of Head Teacher but local community didn't take this matter seriously and no body is willing to provide any space / building.

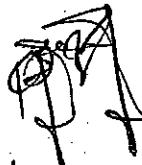
The undersigned had left no stone unturned to solve this matter but lack of interest of local community, Head Teacher (as he is also local)

In the light of above all facts and record of my directions (as on logbook) the undersigned has full filled his responsibility but a single person couldn't do anything without the assistance and cooperation of Head Teacher community and SEDO.

The report of concerned Head Teacher is attached herewith for further necessary action please.

Rafiq Javed

ASDEO Circle Mansehra

  
15/6/2023



OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MANSHEIRA

Phone # 0997-382271

Central Address: Mansheira, Taluka: Sivasagar

Facsimile: 0997-382271

No. 5637 / Edt (M) / No. IV

Dated: 17/6/2023

49

To

Mr. Rafique Javed ASDEO (M) Circle Mansheira  
The Head Teacher GPS No. 1 Mansheira

Subject: ISSUE OF RENTED BUILDING OF GPS NO. 1 MANSHEIRA  
Memo.

Enclose herewith a copy of letter NO. 1873/Misc/ File Dated: 01-06-2023 received from Sub-Divisional Education Officer (M) Mansheira alongwith its enclosures which is self-explanatory.

Explain your position why not taken serious action on the notices of the owner of the building as well as directions of the Sub-Divisional Education Officer (Male) Mansheira.

You are once again directed to take serious action in the light of notices issued by the owner of the building and directions of the SDEO and shift the school to a suitable and approachable building for the best interest for students with immediate effect with the consultation of SDEO (M) Mansheira under intimation to this office without further delay otherwise you are personally held responsible for consequences.

BY: DISTRICT EDUCATION OFFICER  
(MALE) MANSHEIRA

Encl: No. \_\_\_\_\_

Copy for information to the SDEO (M) Mansheira with the directions that as per rule public SDEO concerned is responsible for hiring/occupying the rented buildings where need due to non-availability of Govt. building in the best interest of students/public service with the consultation of U & W department for issuance of rent assessment/Non-availability certificate.

BY: DISTRICT EDUCATION OFFICER  
(MALE) MANSHEIRA

Digitized by eGangotri

**(BETTER COPY PAGE NO. 42)**

**OFFICE OF THE DISTRICT EDUCATION OFFICER, MANSEHRA.**

No. 5637/Estt (M/F.No. 1)

dated 17/06/2023

To

The Rafique Javed ASDEO (M) Circle Mansehra  
The head Teacher GPS No. 1 Mansehra

Subject: **Issue of rented building or GPS No. 1 Mansehra**

Memo:

Enclose herewith a copy of letter No. 1873/Misc File dated 01/06/2023 received from Sub Divisional Education Officer (M) Mansehra alongwith its enclosers which is self explanatory.

Explain your position why not taken serious action on the notices of the owner of the building as well as directions of the Sub Divisional Education Officer (Male) Mansehra.

You are once again directed to take serious sections in the light of notices issued by the owner of the building and direction of th SDEO, and shift the school to a suitable and approachable building for the best interest of students with immediate effect with the consideration of SEDO(M) Mansehra under initiation to this office without further delay other wise you are personally held responsible for consequences.

**Dy District Education Officer  
(Male) Mansehra**

Endst: No \_\_\_\_\_

Copy for information to the SDEO (M) Mansehra with the directions that as per rule policy SEO concerned is responsible for hiring / occupying the rented buildings wher need due to non availability of Govt. building in the best interest of students / public services with the constitution of C&W department for issuance of rent assessment / Non availability certificate.

**Dy District Education Officer  
(Male) Mansehra**

PART II — REMARKS  
For Statistics, see page

43

Remarks

"Action taken by the School Authorities"

14/6/83

آج اجازت 4:30 بجے ملا ہے  
 کا دورہ کیا صبح 7:30 AM پر اسکول  
 میں تھے ٹیٹ اپتے ہیں۔ کھیل  
 بنا کر ڈسپلن امتیازی ضرب ہے۔  
 ایسٹ ٹیچر کو جاری طور پر 4:30 بجے  
 سے اس اسکول میں بھیجا گئے  
 وہاں کھیل کھیل رہے ہیں  
 ٹیچر کو جو 4:30 بجے آئے اس  
 اسکول میں بھیجا گیا تھا۔ 4:30  
 بجے اسکول میں اس وقت  
 کیوں کہ صبح 4:30 بجے  
 میں اس وقت زیادہ سے زیادہ  
 زیادہ طلبہ کو 4:30 بجے بھیجا  
 کہو کہ باہر سیران میں مشغول  
 تھا SDEO ملا ہے 2 بجے  
 سیران کا دورہ کیا اور خود SDEO

PART II — REMARKS

For Statistics, see page

49

Remarks	"Action taken by the School Authorities"
<p>SDPE اور سہ ماہی 25/4/2022 کے بعد اس          سکول کا جو رورہ کیا گیا 23/6          کو 6-7 کے بعد جو رورہ کیا گیا          اس سکول کے مسائل کا بخوبی علم          تھا۔ گیارہ آئی ٹی خود اس سکول          کے ہیئرنگ کیلئے رقم اٹھانا چاہتا          تھا۔ حالانکہ SDPE ملازمہ ان کو          اور کو عمل میں دو دفعہ دورے کیا          گئے اور صاف و تندرست بنا کر          لے گئے۔ یہ مسائل          کو وائس آفیسر سکول میں بھیج دیا          ہوا ہے۔</p> <p>دائیں دستہ اور یہ دفعہ          کے لئے</p> <p>ASDEO          14/6/2023</p>	

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PART II - REMARKS  
For Statistics, see page

40

Teacher	Remarks	Action taken by the School Authorities
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آج مورچہ 19/6/2023 کو 4.30 بجے طلبہ  
 طلبہ کا اجلاس دیا گیا

19/6/2023

میں سے مشورہ و عمل کیا گیا  
 آج پتہ پتہ قریب سے

انس بلڈنگ کے سرکاری کام کے سلسلے  
 میں گیا تو ایک نذر نامہ 5637 مورچہ

17/6/23 انس والوں نے صحیح رہا  
 پتہ لکھ کر سیدھا 4.30

پتہ لکھ کر اسکول بلڈنگ آگیا  
 بلڈنگ میں داخل ہو کر بات کی

27/5/2023 مورچہ  
 میں نے SDEO کو باقاعدہ لکھ کر لیا گیا

ASDEO  
19/6/2023

7/12/24 مورچہ  
 کے لئے جب میں گیا تو میں نے

اس کا پتہ لکھ کر  
 اسکول کو لکھا گیا  
 اور اسکول کے  
 افسر سے بات کی  
 اور اسکول کے  
 افسر سے بات کی

بلڈنگ میں داخل ہو کر  
 اس کے بارے میں بات کی

اس کے بارے میں بات کی  
 اس کے بارے میں بات کی



PART II - REMARKS  
For Statistics, see page

47

Remarks	"Action taken by the School Authorities"
<p>12.5 اجلاس PS کا عملہ کا دورہ          کیا گیا اور اس کے دوران          اور صورت عمل کار کیا گیا          اسکول 2023/8/8 کو تشکیل          کر دیا گیا اس کے دوران          باجی اس کے لئے          بھی طے لگائیں اور          کر کے ایک وی جی ایچ          SDEO کے لئے          لکھا کہ جو صورتیں          آفیس جا کر تیس جمع کر لیں          راجہ محمد رفیق اسکول          13/8/23 عینہ لکھنؤ          اور وارڈ کمر کی فوجی          کرایہ پر دستیاب          کیے گئے ہیں</p>	<p>11-8-2023</p>

PART II - REMARKS  
PART II - REMARKS  
For Statistics, see page  
For Statistics, see page

978

Authorities	Remarks	Action taken by the School Authorities
	<p>والدین سے جو بڑے فون کا کہہ آئے جو بڑے          کرٹیں سے باہر سے سیراں کے لئے          اسکول میں SPS کے لئے سیراں دو بار لگوانے          تو میں نے SDEO کو لکھا کہ اسکول کے          تو اسکول کے لئے سیراں کا اسکول اب          اچھے نظر کو سے عمل میں اسکول          اسی اسکول یعنی SPS کے لئے والدین          میں بھی حاصل ہو۔ جسکو عمل          کرنے کے لئے میں نے یہ رقم اٹھایا اسکول          کے لئے اسکول کی جگہ کے لئے          اسکول کے لئے اسکول میں سے          سے بڑے کے لئے زیادہ ہو گی          لیکن اب اگر SDEO میں سے اسکول          اسی اسکول کے لئے اسکول کو زیادہ          جانی ہے اسکول کے اسکول اسکول          DEO اسکول کے اسکول کے اسکول</p>	



... building that I have checked many  
... building in surrounding area as soon as  
... building back, but all in vain. I have also  
... building is demand

Concerned head teacher is not taking this  
... report on aforesaid matter

ASDEO (M)  
Circle: Manselra

Dated: 27-05-2023

Leave DEO in Manselra for further action  
and n/a please ...  
... responsible person  
Head teacher of Manselra No. 1 as well as  
ASDEO Circle Manselra

*[Handwritten signature]*

(BETTER COPY PAGE NO. 49)

ASDO

(Male) Mansehra

Memo:

It is to inform you that regarding GPS Mansehra No. 1 building that, I have directed many time to respective teacher to find another building in surrounding area as soon as possible, as the owner of the building is demanded..... building back, but all in vain. I have also mentioned this .....

Concerned Head Teacher is not talking this Immediately.

This the report on aforementioned matters.

ASDEO (M)

Circle Mansehra

Dated: 27/05/2023

Neither DEO (Male) Mansehra for further process and necessary action please a proper rule and policy fix the responsibility on responsible person. Head Teacher GPS Mansehra No. 1, as well as ASDEO Circle, Mansehara

Sd/--

30/05/2022

VAKALAT NAMA

NO. \_\_\_\_\_ /20

IN THE COURT OF KP Service Tribunal, Peshawa

Muhammad Rafique Javed

Appellant  
Petitioner  
Plaintiff

VERSUS

Education Deptt

Respondent (s)  
Defendants (s)

I Muhammad Rafique Javed (Appellant) do hereby appoint and constitute the **SYED NOMAN ALI BUKHARI Advocate High Court & UZMA SYED Advocate High Court** for the aforesaid Appellant(s), Petitioner(S), Plaintiff(s) / Respondent(s), Defendant(s), Opposite Party to commence and prosecute / to appear and defend this action / appeal / petition / reference on my / our behalf and all proceedings that may be taken in respect of any application connected with the same including proceeding in taxation and application for review, to draw and deposit money, to file and take documents, to accept the process of the court, to appoint and instruct council, to represent the aforesaid Appellant, Petitioner(S), Plaintiff(s) / Respondent(s), Defendant(s), Opposite Party agree(s) ratify all the acts done by the aforesaid.


DATE \_\_\_\_\_ /20



(CLIENT)

ACCEPTED

  
SYED NOMAN ALI BUKHARI  
ADVOCATE HIGH COURT  
BC-15-5643

&  
  
UZMA SYED  
ADVOCATE HIGH COURT

CELL NO: 0306-5109438