

BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR

Amenated
Service Appeal No. 2586 /2023

Dr. Asim Saeed
(Appellant)

VERSUS

Govt; of KPK etc
(Respondents)

INDEX

S.No.	Description of documents	Annexure	Pages
1.	Memorandum of Appeal and affidavit along with C.M	--	1-6
2.	Copy of Appointment order	A	7-10
3.	Copy of notification dated 10/01/2022	B	11
4.	Copy of impugn order dated 27/09/2023	C	12
5.	Copy of Departmental appeal	D	13-15
6.	Copy of impugned order of appellate Authority dated 11/12/2023	E	16-19
7.	Order dated 01.12.2023	F	17
8.	Copies of academic certificates & order sheet dt: 12/1/24	G & H	18-23
9.	Vakalatnama	--	24

Dated 12/01/2024

Your humble appellant

Dr. Asim Saeed

Through counsel

Ahsan Bilal

Advocate Supreme Court

①

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR**

Amended Appeal _____/2024

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 10537

Dated 12-1-2024

Dr. Asim Saeed son of Muhammad Saeed Resident
of Basti Ustrana Shumali, Principal (BPS-18)
presently serving under the domain of DEO (male),
Dera Ismail Khan.

(Appellant)

VERSUS

1. Govt; of KPK through Secretary Elementary and Secondary Education Department, Khyber Pakhtunkhwa Peshawar, Block "A" opposite MPA's Hostel Civil Secretariat Peshawar.
2. Chief Secretary Govt; of Khyber Pakhtunkhwa Peshawar,
3. Director, Elementary and Secondary Education, KPK Peshawar.
4. Noor Sultan, SDEO (Sub Divisional Education Officer) (BS-17), Dera Ismail Khan. Presently posted as Deputy DEO (male) office, DIkhan.

..... **(RESPONDENTS)**

**AMENDED SERVICE APPEAL U/S 4 OF THE
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
ACT 1974 AGAINST THE IMPUGNED OFFICE
ORDER IMPUGNED ORDER NO.SO(MC)E&SED/2-
3/2022/PROMOTION/MC/ ASIM SAEED /DDEO(M)
DATED 27/09/2023 & NO.SO (MC) E&SED/4-
18/2023/PT/SDEOS DATED 01.12.2023 WHEREBY
THE APPELLANT HAS BEEN TRANSFERRED AS
SSS (ISLAMIYAT) AT GHSS RAMAK, DIKHAN
AND APPEAL AGAINST THE ORDER NO.
SO(MC)E&SED/4-16/2022/DEP. APPEAL/ASIM
SAEED DATED 11/12/2023, WHEREBY THE
DEPARTMENTAL APPEAL OF THE APPELLANT**

2

HAS BEEN REJECTED BY THE APPELLATE
AUTHORITY.

Respectfully Sheweth:

1. That the appellant is serving in the Education Department since 21/04/1999. The appellant has approximately more than 25 years length of service. Later on the appellant was selected and appointed as Principal (BPS-18) via KP, Public Service Commission. Copy of appointment order is annexed Annexure "A".
2. That, before the issuance of impugn order the appellant was serving as Deputy DEO (male) Dera Ismail Khan since 10/01/2022. During this period the appellant gave meritorious services in computerization and web development in middle section, which is first ever project in KP. During this period the appellant received numerous appreciation certificates from the High-ups. Copy of notification dated 10/01/2022 is annexed as Annexure "B".
3. That, on 27/09/2023, the appellant received impugned notification No. SO(MC)E&SED/2-3/2022/ Promotion/MC/Asim Saeed/DDEO(M) dated 27/09/2023 whereby the appellant has been transferred from the post of Deputy DEO (Male) Dera Ismail Khan to Subject Specialist (Islamiyat BS-18) GHSS Ramak DIKhan and private respondent No. 4 (Junior Office of BS-17) was assigned to hold the look after charge of the post



3

of Deputy DEO (male) DIKhan. Copy of impugn order is annexed as Annexure "C".

4. That feeling aggrieved from the impugn order SO(MC)E&SED/2-3/2022/Promotion/MC/Asim Saeed/DDEO (M) dated 27/09/2023, the appellant preferred a departmental appeal on 02/10/2023 but the same met the fate of rejection vide impugned order of appellate authority No SO(MC)E&SED/4-16/2022/dep.Appeal/Asim Saeed dated 11/12/2023. Copies of departmental appeal and rejection order are annexed as Annexure "D" and "E" respectively.

5. That the impugned order No.so (mc) E&SED/4-18/2023/PT/SDEOS dated 01.12.2023 which was not in the knowledge of the appellant when instituted appeal No.2586/23 now at challenged through the amended appeal. (Copy of impugned order dated 01.12.2023 is attached as annexure "F").

6. That the instant service appeal is being filed before this Honourable Tribunal for redressal of grievance as prayed for hereinafter on inter alia on the following grounds,

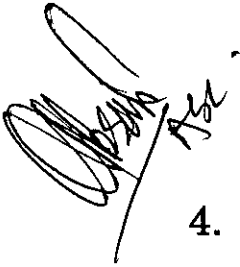
GROUNDS

1. That in the titled case is ripe for reply of respondents however certain order No.SO (MC) E&SED/4-18/2023/PT/SDEOs dated 01.12.2023 which were

4

required to be challenged but could not. That this order is required to be challenged in the appeal.

2. That the impugned transfer order is against service laws, rules and transfer policies and based on political victimization and nepotism, favoritism made against the appellant, hence, liable to be set aside.
3. That basically the appellant was selected via Public Service Commission as a **Principal** on 25/09/2015. The appellant is Masters in **Physics** (M.Sc Physics) and thereafter doctorate (Ph.D) in Education. Astonishingly, the appellant has been posted as Subject Specialist (**Islamiyat BS-18**). The impugned notification clearly reflects the victimization of the appellant. Pertinent to mention here that appellant had not exhausted his normal tenure of service as Deputy DEO (Male). This amount to sheer violation of service rules and laws, hence, the transfer order mentioned above is liable to be cancelled being premature. Copies of academic certificates are annexed as **Annexure "G"**.
4. That the Public servants are always considered to be the back bone of a country and the system, have to be protected against injustices enabling them to deliver to the best of their abilities.
5. That though, transfer/posting is the discretion of the authority but it is the burden duty of authority that while excessing such discretion, the requirement of job, nature of duties, requisite capabilities and know-how of its performance, qualification of incumbent, seniority position etc must be considered. Thus, such discretion falls within the prerogative domain of Government, but it must not escape unnoticed that such discretion should be exercised in accordance with settled norms of justice, equity and fair play.
6. That the impugned transfer/posting order is sought to be justified in the name of "public interest"



5

without comprehending the implication thereof. Thus, the use of phraseology of "public interest" is basically a cover to justify the unjust transfers.

7. That as per service Laws every Civil Servant is liable to serve anywhere as posted by a competent authority but that does not state that civil servant can be posted or transferred by this regarding other relevant service, nor does it empower the authority to cut short the normal tenure of a posted/transferred Civil Servant, and particularly without assigning any reasons.
8. That when ordinary tenure for posting has been specified in the law or rules made there under, such tenure must be respected and cannot be varied, except for compelling reasons, which should be recorded in writing and are judicially reviewable.
9. That the impugned order of appellate authority was issued without perusing the relevant service record and was issued without assigning any reason, which can safely be term as non-speaking order. Hence, is liable to be set aside.
10. That this honourable Tribunal has ample powers to adjudge the matter under reference per prayer made hereby.
11. That the impugned relieving order as well as the other order dated 01.12.2023 impugned transfer orders are Quorum non judice, vide illegal, unwarranted and is liable to be set aside.
12. That counsel for the appellant may graciously be allowed to add to the grounds, on facts and on law as well, during the course of arguments, if needed be.



⑥

In wake of submissions made above, the instant service appeal may kindly be accepted. The impugn order No. SO(MC)E&SED/2-3/2022/Promotion/MC/Asim Saeed/DDEO(M) dated 27/09/2023 & NO.SO (MC) E&SED/4-18/2023/PT/SDEOS DATED 01.12.2023 impugn order No SO(MC)E&SED/4-16/2022/dep. Appeal/ Asim Saeed of Appellate Authority may graciously be set aside/canceled/withdrawn in the large interest of justice.

Any other relief deemed appropriate in circumstances of the case may also be allowed in favour of appellant in the large interest of justice.

Dated : 12/01/2024



Appellant



Through

Ahsan Bilal Langraw
ASC

AFFIDAVIT

I, **Dr. Asim Saeed**, appellant herein, do hereby solemnly affirm on oath that all para-wise contents of the amended appeal are true and correct to the best of my knowledge, belief and nothing has been deliberately concealed from this Honourable Court, nor anything contained therein, based on exaggeration or distortion of facts.

12/01/2024


DEPONENT

Better Copy-7

GOVERNMENT OF KHYBER
PAKHTUNKHWA ELEMENTARY &
SECONDARY EDUCATION
DEPARTMENT

Dated Peshawar the August 25, 2015

NOTIFICATION

NO.SO(S)MDE&SYED/3-2/2014/Recruitment of Principal (BS-18) (Male) Consequent recommendations of Khyber Pakhtunkhwa Public Service Commission Peshawar, the competent Authority is pleased to appoint the following fifty five (55) candidates of Teaching Cadre as Principals (BS-18) (Rs. 25940-1950-64940) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government with immediate effect on the terms and conditions as given below:

Sr.#	Name, Father Name and Address	Domiciles/ Zone
1	Mr. Alam Zeb, S/o Jehan Zeb, Yousaf Zai Medical Store Hospital Road Timergarah Tehsil Timergara Dir Lower	Dir/03
2	Mr. Anas-Ur-Rehman, S/o Toti Rehman, Moh: Ambar Cham District P.O and Tehsil Dir Upper.	Dir/03
3	Mr. Arif Ullah Khan S/o Ghulam Jan, Village and P.O Shahbaz Khel Tehsil & District Lakki Marwat	Lakki Marwat/04
4	Mr. Aurang Zaib S/o Jahan Zen, House no.94 Sector No.4 Mohallah Dar Band Kalabat Town Ship Tehsil & District Haripur	Haripur/05
5	Mr. Faisal Khan S/o Missal Khan, C/O Star Hardware and Paint Store Mian Bazar Havelian Tehsil Havelian Distt: Abbottabad.	Abbottabad/ 05
6	Mr. Ghulam Raziq S/o Fazli Raziq Village Zakhi Miana P.O Akbar Pura Tehsil & District Nowshera	Nowshera/02
7	Mr. Ghulam Zahir S/o Ghulam Farooq Vilalge & P.O Bisham Tehsil Lal Qilla District Lower Dir.	Dir/03
8	Hafiz Shams-Ur-Rehman S/o Ahmed Ali, C/O Moulvi Ahmad Ali General Store Hospital Road P.O Sarai Naurang Lakki Marwat.	Kakki Marwat/04
9	Mr. Hayat Ullah S/o Shams-ul-Qamar, Mohallah Painsda Khel P.O Charsadda Town Teh & District Charsadda	Charsadda/02
10	Mr. Hikmatullah S/o Ali Muhammad C/O Yousaf Medicose Hospital Road Sarai Naurangi P.O Sarai Naurang Tehsil Sarai Naurangi Distt: Lakki Marwat.	Lakki Marwat/ 04
11	Mr. Imtiaz Ali S/o Allah Dad Regional Institute of Teachers Education (Male) Haripur	Haripur/ 05
12	Mr. Inayat-Ul-Haq S/o Lutifullah C/O Doctor Ihsan-ul-Haq Al-Noor Medical Complex near Allaho-Akbar Mosque Saidu Sharif Swat.	Shangla/03
13	Mr. Irfanullah S/o Amin Ullah House # 850, Sadiq Abad Gul Dara Chowk P.O Namak Mandi Kakshal Peshawar.	Dir/03
14	Mr. Ishaq Ali Shah S/o Muhib Ali shah Village & P.O Umar Payan Tehsil & District Peshawar	Peshawar/02
15	Mr. Jamil-ur-Rehman S/o Said Akbar Khan Village Pabani Tehsil & District Swabi	Swabi/02
16	Mr. Jehad Muhammad S/o Shamsul Muhammad Mohallah Zakarya Khail village & P.O Kaddi Tehsil & Distt: Swabi.	Swabi/02
17	Mr. Kamal-ud-Din S/o Khesrow C/O Qamarudin Chatrali Mohd Dad Near Masjid Babus Salam Dabgari Peshawar.	Chitral/03
18	Mr. Khanus-Ul-Haq S/o Mian Habib Jan Village Panam Dheri P.O Mathra Tehsil & Distt: Peshawar.	Peshawar/02
19	Mr. Khan Afsar S/o Mir Afzal, Tanwal Book Depd: Cantt: Bazar Abbottabad.	Abbottabad/05
20	Mr. Khurshid Alam S/o Qamar Zaman, Village & P.O Dheri Alahdand Moh azikhel Tehsil Batkhel District Malakand.	Malakand/03
21	Mr. Khurshid Khan S/o Mian Jan, Govt, Higher Secondary Shool Takht Bhai District Mardan.	Mardan/03
22	Mr. Majeed Ullah S/o Gul Mula, Village and P.O Hathian The: Takht Bhai District Mardan. C/O Rehmanullah Shopkeeper Hashim.	Dir/03

ATTACHED

8

Sr. #	Name, Father Name and Address.	Domhale Zone
23	Mr. Mahabat Shah S/O Arifullah Jan C/O Tajak Bank Depot Main Bazar Timeigiri Dir Lower.	Dir/01
24	Mr. Muhammad Ibrahim S/O Daud Khan, Mohallah: Walayat, Khull, Via Shahbaz village & P.O Tercher Tehsil Lahir District Swabi.	Swabi/02
25	Mr. Muhammad Ihsan Shah S/O Syed Daulat Shah, C/O Janbad Shah Chemist and Druggist Jamrud Bazar, Khyber Agency.	Khy. Agy/01
26	Mr. Muhammad Irfan, S/O Fouqir Gul 159 Durani House C/O Charsadda Medicose Street No. 08 Tarnab Town P.O Peshawar University.	Peshawar/02
27	Mr. Muhammad Javid Khan S/O Hufamat Khan, Village & P.O Shabqadar Azim Khan Qilla Tehsil, Shabqadar District Charsadda.	Charsadda/02
28	Mr. Muhammad Saddique S/O Alim Shah, C/O Lub Qas Agency Tehsil Road Korak.	Korak/04
29	Mr. Muhammad Siraj S/O Muhammad Ashraf, House #5261/E Moh: Kandah Kohat Road Bhana Mari Peshawar.	Peshawar/02
30	Mr. Munir Khan S/O Zulfikar Khan, Rehman General Store Aziz Market Dargai Bazar Malakand.	Malakand/03
31	Mr. Nizar Ali S/O Sardar Ali GHSS Tamah Charsadda.	Charsadda/02
32	Mr. Riaz-ud-Din S/O Mahy-ud-Din, Village Gosam Tehsil Monda District Du Lower.	Bajaur Agy/01
33	Mr. Safer Ullah Khan S/O Ruck-ud-Din Village Lass Garhi Bosti Khel Dura Adam Khel F.R Kohat.	F.R Kohat/01
34	Mr. Sajid Elahi S/O Imran Din, C/O Waheed Cloth House, Sohrab Market Balakot, District Manshera.	Manshera/05
35	Mr. Sajjad Ahmad S/O Muhammad Ayub Govt. Centennial Model School (GHSS No. 3) Manshera.	UDA Manshera/03
36	Mr. Sama-ul-Haq S/O Shams-ul-Haq Village & P.O Srikh Maruzai Tehsil Shabqadar District Charsadda.	Charsadda/02
37	Mr. Saqib Tanveer S/O Sakhi Muhammad Tanveer, 10 Civil Lines Jail Road D.I Khan.	D.I.Khan/04
38	Mr. Sardar Muhammad S/O Mirza Khan Village & P.O Azakhel Payan Tehsil & Dist: Nowshera.	Nowshera/02
39	Sayed Zulfikar Ali S/O Sayed Ali Bahadur Shah Village & P.O Nawngai Tehsil Mandam District Buner.	Buner/03
40	Mr. Shafiq Hussain S/O Muhammad Ashraf, C/O Irtihad Shopkeeper Near Makki Masjid Link Road Abbottabad.	Abbottabad/05
41	Mr. Shah Zada S/O Haidar Khan, Village & P.O Dehri Alladand Moh: Miras Khel Malakand.	Malakand/03
42	Mr. Sher Mohammad S/O Shamsur Rehman Vill: & P.O Chakesar Tehsil Chakesar District Shangla.	Shangla/03
43	Mr. Sher Yaqub S/O Abdul Dayan, Village Kurvi P.O Toru Jabu Tehsil & Dist: Nowshera.	Nowshera/02
44	Mr. Taj Wali S/O Maq Balia Village Sufaid Sung Mah: Wand Khel P.O Sindhga Bazar Tehsil & District Peshawar.	Peshawar/02
45	Mr. Tanveer-ul-Haq S/O Abdul Raziq Hbuse, F-46 Right Bank Chlorey Turbati Dam Tehsil & District Swabi.	Swabi/02
46	Mr. Waqar Khan S/O Sultan Ullah Village Manda P.O Makho Khel Kand: Pateh Khan Khel Sindhga Tehsil and District Peshawar.	Peshawar/02
47	Mr. Zahoor Khan S/O Abdul Qayyum Khan Village Gathi Mah: Khel P.O Dargai Tehsil & District Peshawar.	Peshawar/02
48	Mr. Amir Zeb S/O Wazir Ahmad Govt. High School P.O. Lumbani District Mardan.	Mardan/02
49	Mr. Arif S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	D.I.Khan/04
50	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
51	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
52	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
53	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
54	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
55	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
56	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
57	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
58	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
59	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
60	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
61	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
62	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
63	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
64	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
65	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
66	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
67	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
68	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
69	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
70	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
71	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
72	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
73	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
74	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
75	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
76	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
77	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
78	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
79	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
80	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
81	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
82	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
83	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
84	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
85	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
86	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
87	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
88	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
89	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
90	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
91	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
92	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
93	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
94	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
95	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
96	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
97	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
98	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
99	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02
100	Mr. Aslam S/O Muhammad S/O Bani Ullah Nana Nana Boys Primary School District Mardan.	Mardan/02

ATTESTED

Better Copy-9

Sr.#	Name, Father Name and Address	Domicile/Zone
23	Mr. Mo'abbat Shah S/o Arifullah Jan C/o Tajak Book Depoit Main Bazar Timergara Dir Lower.	Dir/03
24	Mr. Muhammad Ibrahim S/o Daud Khan, Mohallah, Walayat Khail via Shahbaz Village P.O.Tordher Tehsil Lahore District Swabi	Swabi/02
25	Mr.Muhammad Ihsan Shah S/O Syed Daulat Shah, C/O Janbad Shah Chemist and Druggist Jamrud Bazar Khyber Agency.	Khyber Agency/01
26	Mr. Muhammad Irfan, S/o Faqir Gul 159 Durani House C/O Charsadda Medicose Street No. 06 Tajabad Town P.O Peshawar University.	Peshawar/02
27	Mr. Muhammad Javid Khan S/o Hukmat Khan, Village & P.O Shabqadar Azim Khan Qilla Tehsil Shabqadar District Chasadda	Charsadda /02
28	Mr. Muhammad Saddique S/o Alim Shah, C/O Lub Gas Agency Tehsil road Karak.	Karak/04
29	Mr. Muhammad Siraj S/o Muhammad Ashraf, House # 5261/E Moh: Kandar Kohat Road Bhana Mari Peshawar.	Peshawar/02
30	Mr. Munir Khan S/o Zarif Khan, Rehman General Store Aziz Market Dargai Bazar Malakand.	Malakand /03
31	Mr. Nizar Ali S/o Sardar Ali GHSS Tarnab Charsadda.	Charsadda/02
32	Mr. Riaz-ud-Din S/o Mohay-ud-Din, Village Gosam Tehsil Monda District Dir Lower.	Bajour Agy/01
33	Mr. Safeer Ullah Khan S/o Ruck-nu-Din Village Lass Garhi Bosti Khel Dara Adam Khel F.R Kohat	FR Kohat /01
34	Mr. Sajdi Ealhi S/o Imam Din, C/O Waheed Cloth House, Sohrab Market Balakot, District Mansehra.	Mansehra/02
35	Mr. Sajjad Ahmad S/o Muhammad Ayub Govt Centencial Model School (GHS No.3) Mansehra.	UDA Mansehra/03
36	Mr. Sana-ul-Haq S/o Shams-ul-Haq Village & P.O Srikh Marozal Tehsil Shaqadar District Charsadda.	Charsadda/02
37	Mr. Saqib Taneer s/o Sakhi Muhammad Tanver, 10 Civil Lines Jail Road D.I.Khan	D.I.Khan /04
38	Mr. Sarda Muhammad S/o Mirza Khan Village P.O Azakhel Payan Tehsil & Distt: Nowshera.	Nowshera/02
39	Sayed Zulfikar Ali S/o Sayed Ali Bahadur Shah Village & P.O Nawagai Tehsil Mandam District Bunir	Bunir/03
40	Mr. Shafqat Hussain S/o Muhamamd Ashraf, C/O Irshad Shopkeer Near Makki Masjid Link Road Abbottabad.	Abbottabad/05
41	Mr. Shah Zada S/o Haider Khan, Village & P.O Dehri Alladand Mo: Miras Khel Malakand.	Malakand/03
42	Mr. Sher Mohammad S/o Shamsoor Rehman Vill: & P.O Chakesar Tehsil Chakesa District Shangla.	Shangla/03
43	Mr. Sher Yazdan S/o Abdul Dayan, Village Kurvi P.O Taru Jaba Tehsil & Distt: Nowshera	Nowshera/02
44	Mr. Taj Wali S/o Maq Bali, Village Sufaid Sung Moh: Wand Khle P.O Shagai Bazar Tehsil & District Peshawar.	Peshawar/02
45	Mr. Taqweem-ul-Haq S/o Abdur Raziq House # F-46 Right Bank Colony Torbela Dam Tehsil Toppi District Swabi.	Swabi/02
46	Mr. Waqar Khan S/o Sifat Ullah, Village and P.O Masho Khel Kandi Fateh Khan Khel Kandi Tehsil and District Peshawar.	Peshawar/02
47	Mr. Zahoor Khan s/o Abdul Qayyum Khan Village Garhi Mali Khel P.O Badaber The& District Peshawar.	Peshawar/02
48	Mr. Amir Zeb S/o Mustafa Kamal, Govt High School Rustam P.O Rustam District Mardan.	Mardan/02
49	Mr. Assim Saeed S/o Muhammad Saeed, Basti Ustana North Near Boys Primary School Dera Ismail Khan.	D.I.Khan/04
50	Mr. Kifayatullah S/o Rafiullah Kahri village & P.O Mayar Moh: Amukhel Tehsil & District Mardan.	Mardan/02
51	Mr. Muhammad Khan S/o Gul Rehman Village & P.O Gandaf Mohallah Shabi Khel Tehsil Topi District Swabi.	UDA Swabi/03
52	Mr. Saif-ur-Rehman S/o Sultan Khan Hashem GHS Mandew Bannu	Lakki Marwat/04
53	Mr. Sarfaraz S/o B-N..... Girls School and College Dabgari Gardan Peshawar.	Peshawar/02
54	Mr. Shakil Ahmad S/o Mehtab Khan Govt. High School No.2 Becket Gunj Mardan.	Mardan/02

10

Terms & Conditions of Service in r. o. officers from Sr. No. 1 to 55 above are as under:

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

SECRETARY

Order of issue No. & Date

Copy forwarded to the

1. Accounts General, Khyber Pakhtunkhwa
2. Director, E&S, Khyber Pakhtunkhwa, Peshawar
3. District Education Officer (Male) concerned
4. Director, Recruitment, Khyber Pakhtunkhwa Public Service Commission
5. District Accounts Officer, concerned
6. S/o D.A. S...

ATTESTED

11

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar

Amr 18/22
-12-

Dated Peshawar the January 10th, 2022

NOTIFICATION

NO. SOIMC/ESSED/16/2021/POSTING/TRANSFER/MC: The Competent Authority is pleased to order the posting/transfer of the following Management / Teaching Cadre Officers of Elementary & Secondary Education, Khyber Pakhtunkhwa with immediate effect, in the public interest: -

Sr. No.	Name & Designation	From	To
1.	Mr. Asim Saeed (TC BS-18)	Principal GHS Himmat Di Khan	Deputy DEO (Male) Di Khan (AVP)
2.	Mr. Abdul Wahab (TC BS-17)	SDEO (Male) Topi Swabi	SDEO (Male) Bannock Kohistan Lower (Vice No. 2)
3.	Mr. Sher Zada (SST General BS-16)	SDEO (Male) Bannock Kohistan Lower in OPS	Services placed at the disposal of DEO (Male) Kohistan Lower for further adjustment
4.	Mr. Noor Islam (TC BS-18)	Principal GHS Dagai Swabi	Deputy DEO (Male) Swabi (Vice No. 5)
5.	Mr. Sanaullah Khan	Deputy DEO (Male) Swabi OPS	SDEO (Male) Topi Swabi (Vice No. 2)
6.	Muhammad Hussain	SDEO (Male) Kohistan Lower	SDEO (Male) Takti Nusrat Karak (Vice No. 7)
7.	Mr. Farooq Ahmad	SDEO (Male) Kohistan Lower	SDEO (Male) Miral Kohistan Waziristan (AVP)

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
ESSE DEPARTMENT

Copy forwarded for information to:
1. Accountant General, Peshawar
2. Director, ESSE, Peshawar
3. District Education Officers, Swabi and Di Khan
4. District Education Officer, Peshawar
5. District Education Officer, Kohistan
6. District Education Officer, Waziristan
7. District Education Officer, FATA
8. District Education Officer, Gilgit Baltistan
9. District Education Officer, Punjab
10. District Education Officer, Sindh
11. District Education Officer, Balochistan
12. District Education Officer, Islamabad Capital Territory
13. District Education Officer, Federal Capital Territory
14. District Education Officer, Federal Territory of Chandernagore
15. District Education Officer, Federal Territory of Daman and Diu
16. District Education Officer, Federal Territory of Pondicherry
17. District Education Officer, Federal Territory of Lakshadweep
18. District Education Officer, Federal Territory of Jammu and Kashmir
19. District Education Officer, Federal Territory of Jammu
20. District Education Officer, Federal Territory of Ladakh
21. District Education Officer, Federal Territory of Arunachal Pradesh
22. District Education Officer, Federal Territory of Assam
23. District Education Officer, Federal Territory of Bihar
24. District Education Officer, Federal Territory of Chhattisgarh
25. District Education Officer, Federal Territory of Gujarat
26. District Education Officer, Federal Territory of Haryana
27. District Education Officer, Federal Territory of Himachal Pradesh
28. District Education Officer, Federal Territory of Jharkhand
29. District Education Officer, Federal Territory of Karnataka
30. District Education Officer, Federal Territory of Kerala
31. District Education Officer, Federal Territory of Madhya Pradesh
32. District Education Officer, Federal Territory of Maharashtra
33. District Education Officer, Federal Territory of Meghalaya
34. District Education Officer, Federal Territory of Mizoram
35. District Education Officer, Federal Territory of Nagaland
36. District Education Officer, Federal Territory of Odisha
37. District Education Officer, Federal Territory of Rajasthan
38. District Education Officer, Federal Territory of Tamil Nadu
39. District Education Officer, Federal Territory of Uttar Pradesh
40. District Education Officer, Federal Territory of West Bengal
41. District Education Officer, Federal Territory of Andhra Pradesh
42. District Education Officer, Federal Territory of Telangana
43. District Education Officer, Federal Territory of Karnataka
44. District Education Officer, Federal Territory of Kerala
45. District Education Officer, Federal Territory of Madhya Pradesh
46. District Education Officer, Federal Territory of Maharashtra
47. District Education Officer, Federal Territory of Haryana
48. District Education Officer, Federal Territory of Himachal Pradesh
49. District Education Officer, Federal Territory of Jharkhand
50. District Education Officer, Federal Territory of Karnataka
51. District Education Officer, Federal Territory of Kerala
52. District Education Officer, Federal Territory of Madhya Pradesh
53. District Education Officer, Federal Territory of Maharashtra
54. District Education Officer, Federal Territory of Haryana
55. District Education Officer, Federal Territory of Himachal Pradesh
56. District Education Officer, Federal Territory of Jharkhand
57. District Education Officer, Federal Territory of Karnataka
58. District Education Officer, Federal Territory of Kerala
59. District Education Officer, Federal Territory of Madhya Pradesh
60. District Education Officer, Federal Territory of Maharashtra
61. District Education Officer, Federal Territory of Haryana
62. District Education Officer, Federal Territory of Himachal Pradesh
63. District Education Officer, Federal Territory of Jharkhand
64. District Education Officer, Federal Territory of Karnataka
65. District Education Officer, Federal Territory of Kerala
66. District Education Officer, Federal Territory of Madhya Pradesh
67. District Education Officer, Federal Territory of Maharashtra
68. District Education Officer, Federal Territory of Haryana
69. District Education Officer, Federal Territory of Himachal Pradesh
70. District Education Officer, Federal Territory of Jharkhand
71. District Education Officer, Federal Territory of Karnataka
72. District Education Officer, Federal Territory of Kerala
73. District Education Officer, Federal Territory of Madhya Pradesh
74. District Education Officer, Federal Territory of Maharashtra
75. District Education Officer, Federal Territory of Haryana
76. District Education Officer, Federal Territory of Himachal Pradesh
77. District Education Officer, Federal Territory of Jharkhand
78. District Education Officer, Federal Territory of Karnataka
79. District Education Officer, Federal Territory of Kerala
80. District Education Officer, Federal Territory of Madhya Pradesh
81. District Education Officer, Federal Territory of Maharashtra
82. District Education Officer, Federal Territory of Haryana
83. District Education Officer, Federal Territory of Himachal Pradesh
84. District Education Officer, Federal Territory of Jharkhand
85. District Education Officer, Federal Territory of Karnataka
86. District Education Officer, Federal Territory of Kerala
87. District Education Officer, Federal Territory of Madhya Pradesh
88. District Education Officer, Federal Territory of Maharashtra
89. District Education Officer, Federal Territory of Haryana
90. District Education Officer, Federal Territory of Himachal Pradesh
91. District Education Officer, Federal Territory of Jharkhand
92. District Education Officer, Federal Territory of Karnataka
93. District Education Officer, Federal Territory of Kerala
94. District Education Officer, Federal Territory of Madhya Pradesh
95. District Education Officer, Federal Territory of Maharashtra
96. District Education Officer, Federal Territory of Haryana
97. District Education Officer, Federal Territory of Himachal Pradesh
98. District Education Officer, Federal Territory of Jharkhand
99. District Education Officer, Federal Territory of Karnataka
100. District Education Officer, Federal Territory of Kerala
101. District Education Officer, Federal Territory of Madhya Pradesh
102. District Education Officer, Federal Territory of Maharashtra
103. District Education Officer, Federal Territory of Haryana
104. District Education Officer, Federal Territory of Himachal Pradesh
105. District Education Officer, Federal Territory of Jharkhand
106. District Education Officer, Federal Territory of Karnataka
107. District Education Officer, Federal Territory of Kerala
108. District Education Officer, Federal Territory of Madhya Pradesh
109. District Education Officer, Federal Territory of Maharashtra
110. District Education Officer, Federal Territory of Haryana
111. District Education Officer, Federal Territory of Himachal Pradesh
112. District Education Officer, Federal Territory of Jharkhand
113. District Education Officer, Federal Territory of Karnataka
114. District Education Officer, Federal Territory of Kerala
115. District Education Officer, Federal Territory of Madhya Pradesh
116. District Education Officer, Federal Territory of Maharashtra
117. District Education Officer, Federal Territory of Haryana
118. District Education Officer, Federal Territory of Himachal Pradesh
119. District Education Officer, Federal Territory of Jharkhand
120. District Education Officer, Federal Territory of Karnataka
121. District Education Officer, Federal Territory of Kerala
122. District Education Officer, Federal Territory of Madhya Pradesh
123. District Education Officer, Federal Territory of Maharashtra
124. District Education Officer, Federal Territory of Haryana
125. District Education Officer, Federal Territory of Himachal Pradesh
126. District Education Officer, Federal Territory of Jharkhand
127. District Education Officer, Federal Territory of Karnataka
128. District Education Officer, Federal Territory of Kerala
129. District Education Officer, Federal Territory of Madhya Pradesh
130. District Education Officer, Federal Territory of Maharashtra
131. District Education Officer, Federal Territory of Haryana
132. District Education Officer, Federal Territory of Himachal Pradesh
133. District Education Officer, Federal Territory of Jharkhand
134. District Education Officer, Federal Territory of Karnataka
135. District Education Officer, Federal Territory of Kerala
136. District Education Officer, Federal Territory of Madhya Pradesh
137. District Education Officer, Federal Territory of Maharashtra
138. District Education Officer, Federal Territory of Haryana
139. District Education Officer, Federal Territory of Himachal Pradesh
140. District Education Officer, Federal Territory of Jharkhand
141. District Education Officer, Federal Territory of Karnataka
142. District Education Officer, Federal Territory of Kerala
143. District Education Officer, Federal Territory of Madhya Pradesh
144. District Education Officer, Federal Territory of Maharashtra
145. District Education Officer, Federal Territory of Haryana
146. District Education Officer, Federal Territory of Himachal Pradesh
147. District Education Officer, Federal Territory of Jharkhand
148. District Education Officer, Federal Territory of Karnataka
149. District Education Officer, Federal Territory of Kerala
150. District Education Officer, Federal Territory of Madhya Pradesh
151. District Education Officer, Federal Territory of Maharashtra
152. District Education Officer, Federal Territory of Haryana
153. District Education Officer, Federal Territory of Himachal Pradesh
154. District Education Officer, Federal Territory of Jharkhand
155. District Education Officer, Federal Territory of Karnataka
156. District Education Officer, Federal Territory of Kerala
157. District Education Officer, Federal Territory of Madhya Pradesh
158. District Education Officer, Federal Territory of Maharashtra
159. District Education Officer, Federal Territory of Haryana
160. District Education Officer, Federal Territory of Himachal Pradesh
161. District Education Officer, Federal Territory of Jharkhand
162. District Education Officer, Federal Territory of Karnataka
163. District Education Officer, Federal Territory of Kerala
164. District Education Officer, Federal Territory of Madhya Pradesh
165. District Education Officer, Federal Territory of Maharashtra
166. District Education Officer, Federal Territory of Haryana
167. District Education Officer, Federal Territory of Himachal Pradesh
168. District Education Officer, Federal Territory of Jharkhand
169. District Education Officer, Federal Territory of Karnataka
170. District Education Officer, Federal Territory of Kerala
171. District Education Officer, Federal Territory of Madhya Pradesh
172. District Education Officer, Federal Territory of Maharashtra
173. District Education Officer, Federal Territory of Haryana
174. District Education Officer, Federal Territory of Himachal Pradesh
175. District Education Officer, Federal Territory of Jharkhand
176. District Education Officer, Federal Territory of Karnataka
177. District Education Officer, Federal Territory of Kerala
178. District Education Officer, Federal Territory of Madhya Pradesh
179. District Education Officer, Federal Territory of Maharashtra
180. District Education Officer, Federal Territory of Haryana
181. District Education Officer, Federal Territory of Himachal Pradesh
182. District Education Officer, Federal Territory of Jharkhand
183. District Education Officer, Federal Territory of Karnataka
184. District Education Officer, Federal Territory of Kerala
185. District Education Officer, Federal Territory of Madhya Pradesh
186. District Education Officer, Federal Territory of Maharashtra
187. District Education Officer, Federal Territory of Haryana
188. District Education Officer, Federal Territory of Himachal Pradesh
189. District Education Officer, Federal Territory of Jharkhand
190. District Education Officer, Federal Territory of Karnataka
191. District Education Officer, Federal Territory of Kerala
192. District Education Officer, Federal Territory of Madhya Pradesh
193. District Education Officer, Federal Territory of Maharashtra
194. District Education Officer, Federal Territory of Haryana
195. District Education Officer, Federal Territory of Himachal Pradesh
196. District Education Officer, Federal Territory of Jharkhand
197. District Education Officer, Federal Territory of Karnataka
198. District Education Officer, Federal Territory of Kerala
199. District Education Officer, Federal Territory of Madhya Pradesh
200. District Education Officer, Federal Territory of Maharashtra

ATTESTED

Better Copy-

GOVERNMENT OF KHYBER PAKHTUNKHWA

ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
Block "A" Opposite MPA's Hostel Civil Secretariat Peshawar.
Peshawar No. 091-9223588

Dated Peshawar the January 10th, 2022

NOTIFICATION:-

NO. SO(MC)E&SED/4-16/2021/POSTING/TRANSFER/MC: the Competent Authority in pleased to order the posting/transfer of the following Management/Teaching Cadre Officers of Elementary & Secondary Education, Khyber Pakhtunkhwa with immediate effect, in the public interest:-

Sr. No.	Name & Designation	From	To
1.	Mr. Asim Saeed (TC BS-18)	Principal GHS Himmat DI Khan	Deputy DEO (Male) Khan (AVP)
2.	Mr. Abdul Wahab (MC BS-17)	SDEO (Male) Topi Swabi	SDEO (Male) Bankand Kohistan Lower (Vice No.3).
3.	Mr. Sher Zada SST General (BS-16)	SDEO (Male) Bankand Kohistan Lower in OPS	Services Placed at the disposal of DEO (Male) Kohistan Lowr for further adjustment.
4.	Mr. Noor Islam (TC BS-18)	Principal GHS Dagai Swabi	Deputy DEO (Male) Swabi (Vice No-5)
5.	Mr. Sikandar Hayat (MC BS-17)	Deputy DEO (Male)	SDEO (Male) Topi Swabi (Vice-02)
6.	Muhammad Hussain (MC-BS16)	ASDEO (Male) Takhti Nusrati Karak	SDEO (Male) Takhti Nusrati Karak (Vice No- 7)
7.	Muhammad Naeem (MC BS17)	SDEO (Male) Takht Nusrati Karak	SDEO (Male) Mirali North Waziristan (AVP).

SECRETARY TO GOVT OF KHYBER PAKHTUNKHWA E&SE
DEPARTMENT

Endst: of Even No. & date

Copy forwarded for information:-

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa Peshawar.
3. District Education Officer (Male) Swabi and Di.Khan.
4. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
5. District Accounts Officers Swabi and Di.Khan.
6. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
7. Officers Concerned.
8. Master File.

(HAFEEZ-UR-REHMAN SHAH)
SECTION OFFICER (Management Cadre)

ATTESTED



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9210626

Amir e

12

Dated: 27th September, 2023

NOTIFICATION

NO.SO(MC)E&SED/2-3/2022/Promotion/MC/Asim Saeed/DDEO(M): Due to administrative exigencies Mr Asim Saeed, (TC BS 18), Deputy DEO (Male) D.I.Khan is hereby transferred posted as Subject Specialist (Islamiyat BS-18) GHSS Ramak D.I.Khan against the vacant post, with immediate effect.

Consequent upon the above, Muhammad Noor Sultan SDEO (M) D.I.Khan is hereby authorized to hold the Look After charge for the post of Deputy DEO (Male) D.I.Khan, in addition to his own duties, as stop gap arrangement, purely on temporary basis, till the arrival of regular officer, in the best public interest.

SECRETARY TO THE GOVT: OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Endst: of even No.& date:

Copy forwarded for information to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
4. Section Officer (School Male) E&SE Department.
5. District Education Officer (Male) D.I.Khan.
6. District Accounts Officer D.I.Khan.
7. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
8. Officers concerned.
9. Master file.

111 / 27.9.23
(IMRAN ZAMAN)

SECTION OFFICER (Management Cadre)

Handwritten signature

13

Amir D
B



OFFICE OF THE DISTRICT EDUCATION OFFICER
(MALE) DERA ISMAIL KHAN

No. 18437-1
Dated DIKhan the 04/10/2023

To
The Director
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

SUBJECT: DEPARTMENTAL APPEAL/REPRESENTATION AGAINST IMPUGNED
NOTIFICATION ORDER NO.SO (MC)E&SED/2-
3/2022/Promotion/MC/Asim Saeed/DDEO (M) DATED 27-09-2023,
WHEREBY THE APPELLANT HAS BEEN TRANSFERRED AS SS
(ISLAMIYAT) BS-19 GHSS RAMAK DERA ISMAILKHAN.

Memo:

Please find enclosed herewith the original application received from Dr. Asim Saeed
Ex-Deputy District Education Officer (Male) DIKhan is sent for further process.

DISTRICT EDUCATION OFFICER
(MALE) DERA ISMAIL KHAN

Encl No 18438

Copy of the above is forwarded to the:-

1. PS to Secretary, E&SED Khyber Pakhtunkhwa Peshawar.
2. Master File.

DISTRICT EDUCATION OFFICER
(MALE) DERA ISMAIL KHAN

ATTACHED

14

**BEFORE THE WORTHY CHIEF SECRETARY
KHYBER PAKHTUNKHWA PESHAWAR**

CS, Diny No. 48687
dt 18/10

Subject: DEPARTMENTAL APPEAL/REPRESENTATION AGAINST IMPUGNED NOTIFICATION ORDER NO. SO(MC)E&SED/2-3/2022/Promotion/MC/Asim Saeed/DDEO(M) DATED 27/09/2023 WHEREBY THE APPELLANT HAS BEEN TRANSFERRED AS SSS (ISLAMIYAT BS-10) GHSS RAMAK DERA ISMAIL KHAN

Respected Sir,

Appellant humbly submits as under:

1. That the appellant is serving in the Elementary & Secondary Education Department Khyber Pakhtunkhwa since 21.04.1999. The appellant has approximately more than 25 years length of service.
2. That, at present, the appellant has been serving as Deputy District Education Officer (Male) Dera Ismail Khan vide E&SE Department Notification dated 10.01.2022. During this period appellant gave meritorious services to the department in computerization of record and web development for the Middle Section, which is first ever project in KP. During this period the appellant received numerous appreciation certificates from the High-ups.
3. That, on 27.09.2023, the appellant received impugned Notification No. SO(MC)E&SED/2-3/2022/Promotion/MC/Asim Saeed / DDEO (M) dated 27.09.2023 whereby the appellant had been transferred from the post of Deputy District Education Officer (Male) Dera Ismail Khan to post of Senior Subject Specialist (Islamiyat BS-18) GHSS Ramak DIKhan and a junior officer of BS-17 was allowed to hold the additional charge of the post of Deputy DEO(M)DIKhan. It is clear discrimination with the appellant.
4. That the appellant was selected as Principal (BS-18) through Public Service Commission on 25.09.2015. The appellant is highly qualified having Master Degree in Physics and PhD Degree in Education. Astonishingly, the appellant had been posted as Subject Specialist (Islamiyat BS-18). The impugned Notification clearly reflects the victimization of the appellant. It is pertinent to mention here that appellant had not exhausted his normal tenure of service as Deputy DEO (Male) DIKhan. This amount to sheer violation of service rules and transfer posting policy of the Government, hence, the transfer order mentioned above is liable to be set aside being premature.
5. That the above-mentioned transfer order is based on political victimization and nepotism, favoritism made against the appellant, hence, liable to be set aside.

ASE / SOMC

Sayy Diny No 3146
dt - 18/10

Scanned with AltaScanner

ATTACHED

15

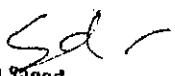
~~18~~

6. That the Public servants are always considered to be the back bone of a country and the system, have to be protected against injustices enabling them to deliver to the best of their abilities.
7. That though, transfer/posting is the discretion of the authority but it is the burden duty of authority that while exercising such discretion, the requirement of job, nature of duties, requisite capabilities and know-how of its performance, qualification of incumbent, seniority position etc must be considered. Thus, such discretion falls within the prerogative domain of Government, but it must not escape unnoticed that such discretion should be exercised in accordance with settled norms of justice, equity and fair play.
8. That the impugned transfer/posting order is sought to be justified in the name of "public interest" without comprehending the implication thereof. Thus, the use of phraseology of "public interest" is basically a cover to justify such like transfers.
9. That as per Service Laws every Civil Servant is liable to serve anywhere as posted by a competent authority but that does not state that civil servant can be posted or transferred by this regarding other relevant service, nor does it empower the authority to cut short the normal tenure of a posted/transferred Civil Servant, and particularly without assigning any reasons.
10. That when ordinary tenure for posting has been specified in the law or rules made there under, such tenure must be respected and cannot be varied, except for compelling reasons, which should be recorded in writing and are judicially reviewable.

In wake of submissions made above, the Impugned order No. SO(MC)E&SED/2-3/2022/Promotion/MC/ Asim Saeed / DDEO(M) dated 27/09/2023 may graciously be set aside/canceled/withdrawn in the large interest of justice.

Dated: 02/10/2023

Yours' humble Appellant



Dr. Asim Saeed
Deputy DEO(M) Dera Ismail Khan
Principal BS-18
R/O Basti Ustrana Shumali Di Khan
0300-579-1911, 0344-939-3903

Scanned with AltaScanner

~~ATTACHED~~



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9223588

16

Annex "E"

No. SO (MC)E&SED/4-16/2022/dept. Appeal/Asim Saeed
Dated: 11th December 2023

To

Dr. Asim Saeed
Ex- Deputy DEO (Male)
District D.I.Khan

Subject: - **DEPARTMENTAL APPEAL/ REPRESENTATION AGAINST IMPUGNED NOTIFICATION ORDER NO. NO.SO(MC)E&SED/2-3/2022/PROMOTION /MC/ASIM SAEED/DDEO(M) DATED 27.09.2023, WHEREBY THE APPELLANT HAS BEEN TRANSFERRED AS SSS (ISLMEYAT) GHSS RAMAK D.I. KHAN**

I am directed to refer to your appeal No. 3140 dated 02.10.2023, on the subject noted above and to state that your appeal has been examined and filed, having no legal ground.

11/12/2023
(IMRAN ZAMAN)
SECTION OFFICER (Management Cadre)

Copy for information to the: -
PS to Secretary E&SE Department, Khyber Pakhtunkhwa.

SECTION OFFICER (Management Cadre)

ATY

"F"

(17)



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9210626

Dated, 1st December, 2023

NO. SO (MC) E&SE/D4-18/2023/NPT/SDEOs The following posting/ transfer of SDEOs are hereby ordered with immediate effect, in the best public interest.

Sr#	Name	From	To	Remarks
1.	Mr. Noor Sultan MC BS-17	SDEO (M) D.I.Khan	Deputy DEO (M) D.I.Khan in OPS	AVP
2.	Muhammad Humayun MC BS-17	SDEO (M) SD Darazenda DIK	SDEO (M) D.I.Khan	V.S.No.1
3.	Muhammad Rashid TC BS-17	Head Master (BS-17) GHS Sikandar Sout DIK	SDEO (M) SD Darazenda DIK	V.S.No.2

**SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT**

End of page No. & date:

Copy forwarded for information to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
4. District Education Officers (Male) D.I.Khan.
5. District Accounts Officer D.I.Khan.
6. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.

114
12-20
(IMRAN ZAMAN)
SECTION OFFICER (Management Car)

ATTACHED

ATTACHED

19"

18

Annex - 18

Serial No. GU 2 01705

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

GOMAL UNIVERSITY

DERA ISMAIL KHAN

(P.A.F.S)

PAKISTAN



(Session 1992-94)

MUHAMMAD SAIED. SON of MUHAMMAD SAIED. and

a student of the DEPARTMENT OF PHYSICS,

having passed the prescribed examination in AUGUST, 1994

is this day admitted by the Gomal University to the DEGREE of

MASTER OF SCIENCE

in the FIRST Class

The subject of examination being PHYSICS.

The Examination was taken as a whole/IN PARTS

Registered No. 2816-D-90

Roll No. 417

July 11, 1997

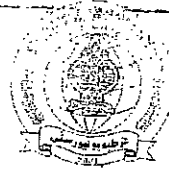
Countersigned

M. Chis

Controller of Examinations

Vice-Chancellor

[Signature]



Qurtuba University
of Science and Information Technology
Dera Ismail Khan, Khyber Pakhtunkhwa, Pakistan

In recognition of
the successful completion of the course of study
this University has conferred on

ASIM SAEED S/O MUHAMMAD SAEED

the degree of -

DOCTOR OF PHILOSOPHY in EDUCATION

Given this thirty first

day of December two thousand and twenty-one

Muhammad Niam
- Controller of Examinations

Amir
Registrar

[Signature]
Vice-Chancellor

-19-

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**



Civil Misc/Execution petition No. 19 /2024

DR. ASIM SAEED son of Muhammad Saeed Resident of Basti Ustrana Shumali, Principal (BPS-18) presently serving under the domain of DEO (male), Dera Ismail Khan.

(Petitioner)

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 10333

Date 4-1-2024

VERSUS

1. **Govt; of KPK through Secretary Elementary and Secondary Education Department, Khyber Pakhtunkhwa Peshawar**, Block "A" opposite MPA's Hostel Civil Secretariat Peshawar.
2. **Chief Secretary Govt; of Khyber Pakhtunkhwa Peshawar,**
3. **Director, Elementary and Secondary Education, KPK Peshawar.**
4. **Noor Sultan, SDEO (Sub Divisional Education Officer) (BS-17), Dera Ismail Khan. Presently posted as Deputy DEO (male) office, DIkhan.**

..... **(RESPONDENTS)**

**PETITION UNDER SECTION 7(2)(D) OF THE K.P.K PROVINCE
SERVICE TRIBUNALS ACT FOR IMPLEMENTATION/EXECUTION OF
THE ORDER DATED 15/12/2023 PASSED IN SERVICE APPEAL NO
.2586/2023**

Note: Addresses given above shall suffice the object of service.

Respectfully Sheweth;

1. That the petitioner is serving in the Education Department since 21/04/1999.
2. That, the petitioner received impugned notification No. So(MC)E&SED/2-3/2022/ promotion/MC/Asim saeed /DDEO(M)

TESTED

EXAMINED
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

12.01.2024

Counsel for the appellant present. Mr. Habib Anwar, Additional Advocate General for the respondents present.

Learned counsel for the appellant submitted a copy of order dated 01.12.2023, whereby private respondent No. 4 in the main appeal has been posted as Deputy District Education Officer vice the appellant. Since this order was not in the knowledge of the court during hearing on 15.12.2023, operation of the order dated 27.09.2023 was suspended. Therefore the learned counsel for the appellant requested to make necessary amendments by impugning the order dated 01.12.2023 in the main appeal which has been fixed for hearing on 16.01.2024 at Camp Court DI. Khan. File to come up alongwith service appeal No.2586/23 on 16.01.2024 before S.B at Camp Court D.I Khan. Meanwhile operation of the order dated 01.12.2023 shall also remain suspended till next date of hearing.

(Muhammad Akbar Khan)
Member (E)

SCANNED BY
KAMRANULLAH
12/01/24

Kamranullah

27
10/1
15/1

12/01/24

17/01/24
12/01/24

22

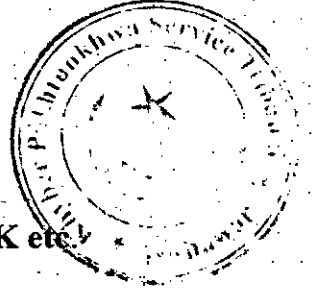
BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

In Civil Misc/Execution petition No. _____/2024

Dr. Asim Saeed

Versus

Govt. of KPK etc



Civil Misc/Execution petition

URGENT APPLICATION FOR THE GRANT OF INTERIM RELIEF TO PLEASE SUSPEND THE OPERATION OF NOTIFICATION NO , SO (MC) E& SED/4-16/2023/PT/SDEOs DATED 01/12/2023,ISSUED BY RESPONDENTS NO 1 SOON AFTER ISSUEINCE OF NOTIFICATION NO SO(MC)E& SED /2-3/2022 PROMTION /MC/ ASIM SAEED /DDEO(M)DATED 27/09/2023 RESPONDENTS NO ,1 which was already suspended by KPST on dated 15/12/2023. TILL FINAL OUTCOME OF THE EXECUTION PETITION.

Respectfully sheweth .

1. That an Execution Petition is being filed before this Honourable Court and grounds of same may please be considered as an integral part of this application.
2. That the application has got a strong prima facie case on the basis of law as well as facts and there is every likelihood of the success of Execution Petition hence, Balance of convenience tilts in favour of the applicant.
3. That the non grant of interim relief, as prayed for ,would effect the rights of applicant adversaly and it would be an irrepearable loss to him.

ATTESTED

Khyber Pakhtunkhwa
Service Tribunal
Peshawar

It is therefore ,humbly prayed that on the acceptance of the instant Civil, Misc. Application the operation of Notification dated

23

01/12/2023 issued by respondents No .1 may please be suspended till decision of the Execution petition ,and in the meanwhile ,status quo may kindly be ordered to be maintained.

Deponent

Malik Ahsan Bilal

Through Counsel

Malik Ahsan Bilal Langraw ASC

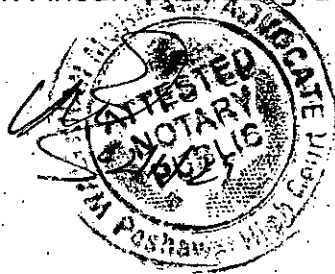
AFFIDAVIT:

I, the petitioner ,do solemnly affirm & Declare on Oath that the contents of accompanying Misc/Execution Petition are true & correct to the best of my knowledge and nothing has been concealed from this Honourable Court

Malik Ahsan Bilal

Identified by Counsel
Malik Ahsan Bilal Langraw ASC

Malik Ahsan Bilal
Deponent



Malik Ahsan Bilal

20
10/12
10/12

Malik Ahsan Bilal
Malik Ahsan Bilal

وکالت نامہ

MALIK AHSAN BILAL LANGRAW
ADVOCATE SUPREME COURT

SUPREME COURT NO.5412 & KPK B.C NO.0929

24

بعدالت جناب

سروس ٹریڈ مارک کے لیے
مخانب ڈاکٹر اعجاز احمد سیّد
ڈاکٹر اعجاز احمد سیّد
بنام لورنٹ

دعویٰ یا جرم

تفصیل دعویٰ یا جرم

باعث تحریر آئندہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف واسطے پیروی و جوابدہی برائے پیشی یا تصفیہ مقدمہ بمقام ریکارڈ آف پاکستان کیلئے

ملک احسن بلال لنگراہ ایڈووکیٹ سپریم کورٹ آف پاکستان

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختیار خاص رو برو عدالت ہذا حاضر ہوتا رہوں گا۔ اور ہر وقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دیکر حاضر عدالت کروں گا، اگر پیشی پر مظہر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے برخلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے، نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ کسی جگہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل پیروی کرنے کے ذمہ دار نہ ہوں گے۔ اور مقدمہ صدر پکھری کے علاوہ اور جگہ سماعت ہونے یا بروز تعطیل یا پکھری کے اوقات کے آگے پیچھے پیش ہونے پر مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا بختانہ واپس کرنے کے بھی موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پر داخلہ صاحب موصوف مثل کردہ ذات خود منظور قبول ہوگا۔ اور صاحب موصوف کو عرضی دعویٰ یا جواب دعویٰ یا درخواست اجراءے ڈگری و نظر ثانی اپیل نگرانی و ہر قسم درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کرانے اور ہر قسم کاروبار وصول کرنے اور رسید داخل کرنے اور دینے اور ہر قسم کے بیان دینے اور اس پر ثالثی یا راضی نامہ و فیصلہ برحلف کرنے، اقبال دعویٰ کا بھی اختیار ہوگا۔ اور بصورت مقرر ہونے تاریخ پیشی مقدمہ مذکور بیرون از پکھری صدر پیروی مقدمہ مذکورہ نظر ثانی و اپیل و نگرانی و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ یا درخواست حکم استماعی یا ترقی یا گرفتاری قبل از فیصلہ اجراءے ڈگری بھی صاحب موصوف کو بشرط ادا کی علیحدہ جتانہ پیروی کا اختیار ہوگا اور تمام ساختہ برداختہ صاحب موصوف مثل کردہ ذات خود منظور و قبول ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکورہ یا اسکے کسی جزو کی کارروائی یا بصورت درخواست نظر ثانی اپیل یا نگرانی یا دیگر معاملہ مقدمہ مذکورہ کسی دوسرے وکیل یا بیرٹر کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے شیر قانون کو بھی ہر امر میں وہی اور ویسے اختیارات حاصل ہوں گے، جیسے صاحب موصوف کو حاصل ہیں۔ اور دوران مقدمہ میں جو کچھ ہر جانہ التواء پڑیگا، وہ صاحب موصوف کا حق ہوگا۔ مگر صاحب موصوف کو پیروی نہیں تاریخ پیشی سے پہلے ادا نہ کروں گا۔ تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی پیروی نہ کریں اور ایسی صورت میں میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا وکالت نامہ لکھ دیا ہے تاکہ سند رہے۔

مورخہ _____ ماہ _____ 2022

مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور و قبول ہے۔

Accepted
Over Seal

Asim Saad