

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

**SERVICE APPEAL NO. 511/2019**

Date of institution ... 17.04.2019

Date of judgment ... 12.09.2019

Gul Faraz, (BS-17)

SDEO (Male) Bahrain Swat.

... (Appellant)

**VERSUS**

1. The Chief Secretary Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
  2. The Secretary to Government (E&SE) Department Khyber Pakhtunkhwa, Peshawar.
  3. The Executive District Officer School & Literacy Karak.
  4. Mr. Muhammad Farooq, SDEO (BS-17), (Male) Karak.
- ... (Respondents)

SERVICE APPEAL UNDER SECTION-4 OF THE SERVICE TRIBUNAL ACT, 1974 AGAINST THE ORDER DATED 07.02.2019 WHEREBY THE APPELLANT WAS TRANSFERRED PREMATURELY, UTTER VIOLATION OF POSTING TRANSFER POLICY AND AGAINST THE SPOUSE POLICY AND AGAINST REJECTION ORDER DATED 10.04.2019 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT WAS REJECTED FOR NO GOOD GROUNDS.

Mr. M. Asif Yousafzai, Advocate.

.. For appellant.

Mr. Kabirullah Khattak, Additional Advocate General

.. For official respondents.

Mr. Khalid Rahman, Advocate.

.. For private respondent.

Mr. MUHAMMAD AMIN KHAN KUNDI

.. MEMBER (JUDICIAL)

MR. HUSSAIN SHAH

.. MEMBER (EXECUTIVE)

**JUDGMENT**

MUHAMMAD AMIN KHAN KUNDI, MEMBER: - Appellant

alongwith his counsel present. Mr. Kabirullah Khattak, Additional Advocate General on behalf of official respondents No. 1 to 3 and counsel for private respondent No. 4 present. Arguments heard and record perused.

2. Brief facts of the case as per present service appeal are that the appellant and private respondent alongwith some others Assistant Sub-Divisional

*M. Asif Yousafzai*  
12.9.2019

Education Officers/Assistant District Education Officers (BS-16) were promoted to the post of Sub-Divisional Education Officers/Assistant Directors (BS-17) (Management Cadre) on the recommendation of Departmental Promotion Committee by the competent authority vide order dated 26.09.2018. After the said promotion, the appellant was adjusted as Sub-Divisional Education Officer (BS-17) at Bahrain Swat while private respondent Muhammad Farooq was adjusted as Sub-Divisional Education Officer (BS-17) at Karak vide order dated 29.10.2018. On 31.10.2018, the appellant submitted application/departmental appeal for adjustment as Sub-Divisional Education Officer (Male) under the spouse policy at his nearest station i.e 1. District Karak (home district) SDEO (M) Karak, SDEO (M) B.D Shah & SDEO (M) Takht-e-Nasratti. 2. District Kohat (SDEO) (M) Kohat. Accordingly, the appellant was transferred from the post of Sub-Divisional Education Officer (BS-17) Bahrain Swat to the post of SDEO (Male) Karak while private respondent Muhammad Farooq was transferred from the post of Sub-Divisional Education Officer (BS-17)(Male) Karak to the post of Sub-Divisional Education Officer (BS-17) Bahrain Swat vide order dated 13.11.2018. Private respondent challenged the said order dated 13.11.2018 in the Writ Petition before the worthy High Court and the worthy High Court treated the said Writ Petition as departmental appeal and sent to the Secretary Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar for decision in accordance with law vide judgment dated 26.11.2018 and thereafter the competent authority again transferred the appellant from the post of Sub-Divisional Education Officer (BS-17) (Male) Karak to the post of Sub-Divisional Education Officer (BS-17) Bahrain Swat while private respondent was transferred at the place of appellant from the post of Sub-Divisional Education Officer (BS-17) Bahrain Swat to the post of SDEO (Male) Karak vide order dated 07.02.2019. The appellant filed departmental

*M. Amin*  
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appeal on 11.02.2019 but the same was rejected vide order dated 10.04.2019 hence, the present service appeal on 17.04.2019.

3. Respondents were summoned who contested the appeal by filing written reply/comments.

4. Learned counsel for the appellant contended that the appellant and private respondent were promoted from the post of Assistant Sub-Divisional Education Officers/Assistant District Education Officers (BS-16) to the post of Sub-Divisional Education Officers/Assistant Directors (BS-17) (Management Cadre) alongwith some others vide order dated 26.09.2018. It was further contended that the appellant was adjusted as Sub-Division Education Officer (BS-17) at Bahrain Swat while the private respondent was adjusted as Sub-Divisional Education Officer (BS-17) (Male) Karak vide order dated 29.10.2018. It was further contended that the appellant submitted departmental appeal/request for adjustment as Sub-Divisional Educational Officer (Male) under the spouse policy at the nearest station to his home district i.e Karak and District Kohat as Sub-Divisional Education Officer (Male) on 31.10.2018. It was further contended that the said departmental appeal/request was accepted and the appellant was transferred from the post of Sub-Divisional Education Officer (BS-17) Bahrain Swat to the post of Sub-Divisional Education Officer (BS-17) (Male) Karak while the private respondent was transferred from Sub-Divisional Education Officer (BS-17) (M) Karak to the post of Sub-Divisional Education Officer (BS-17) Bahrain Swat vide order dated 13.11.2018. It was further contended that the private respondent challenged the said order through Writ Petition before the worthy High Court and the Writ Petition of the private respondent was treated as departmental appeal by the worthy High Court and thereafter the competent authority passed the impugned order dated 07.02.2019. It was further contended that there is nothing in the order dated 07.02.2019 to show that the said order was passed on the basis of judgment of the worthy

*M. A. H. Khan*  
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High Court or departmental appeal of the private respondent. It was further contended that the appellant was transferred by the competent authority from the post of Sub-Divisional Education Officer (BS-17) (Male) Karak to the post of Sub-Divisional Education Officer (BS-17) Bahrain Swat vide order dated 07.02.2019 without any reason. It was further contended that the appellant also having three minor daughters and one minor son and no other male family member is available to look after his family. It was further contended that the wife of the appellant is also serving as SET (BPS-16) at Government Girls Higher Secondary School Karak. It was further contended that the departmental appeal of the appellant was rejected by the appellate authority without any reason. It was further contended that the normal tenure of the appellant was not completed at the post of Sub-Divisional Education Officer (BS-17) (Male) Karak and he was prematurely transferred by the competent authority. It was further contended that the respondent-department has violated the transfer posting policy as well as wedlock policy, therefore, the impugned order is illegal and liable to be set-aside and prayed for acceptance of appeal.

5. On the other hand, learned Additional Advocate General for official respondents No. 1 to 3 and learned counsel for private respondent No. 4 opposed the contention of learned counsel for the appellant and contended that the appellant and private respondent were promoted from the post of Assistant Sub-Divisional Education Officers/Assistant District Education Officers (BS-16) to the post of Sub-Divisional Education Officers/Assistant Directors (BS-17) (Management Cadre) vide order dated 26.09.2018. It was further contended that according to the merit list, the private respondent is at serial no. 3 while the appellant is at serial no. 30. It was further contended that taking into consideration the merit list/promotion order dated 26.09.2018, the appellant was adjusted as Sub-Divisional Education Officer (BS-17) Bahrain Swat while the private respondent was adjusted as Sub-Divisional Education (BS-17) (Male)

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Karak. It was further contended that due to political influence, the appellant was transferred from the post of Sub-Divisional Education Officer (BS-17) Bahrain Swat to the post of Sub-Divisional Education Officer (BS-17) (Male) Karak at the place of private respondent just after 15 days. It was further contended that the private respondent challenged the said order through Writ Petition before the worthy High Court which was treated as departmental appeal and on the basis of departmental appeal, the appellant was again transferred from the post of Sub-Divisional Education Officer (BS-17) (Male) Karak to the post of Sub-Divisional Education Officer (BS-17) Bahrain Swat. It was further contended that the private respondent also having three minor daughters and no other male member is available to look after his family. It was further contended that under Section-10 of the Civil Servants Act the competent authority is empowered to transfer a civil servant from one place to another place to meet the exigency of service on administration provided the terms and conditions of services were not adversely affected. It was further contended that the civil servant has no vested right to claim posting or transfer to any particular place at his choice nor did he have any right to continue to hold at particular post at a particular place therefore, it was contended that the appeal has no force and prayed for dismissal of appeal.

6. Perusal of the record reveals that the appellant and private respondent was promoted from the post of Assistant Sub-Divisional Education Officers/Assistant District Education Officers (BS-16) to the post of Sub-Divisional Education Officers/Assistant Directors (BS-17) (Management Cadre) alongwith some others vide order dated 26.09.2018. The record further reveals that in the said promotion list, the private respondent has been shown at serial no. 3 while the appellant has been shown at serial no. 30. The record further reveals that taking into consideration the said merit list, the appellant was adjusted as Sub-Divisional Education Officer (BS-17) Bahrain Swat while the

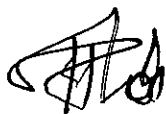
*M. J. M.*  
12.9.2019

private respondent was posted as Sub-Divisional Education Officer (BS-17) (Male) Karak vide order dated 29.10.2018. The record further reveals that just after two days on 31.10.2018, the appellant filed departmental appeal/request for his adjustment as Sub-Divisional Education Officer (BS-17) (Male) Karak under the spouse policy to the nearest station at his home district and the appeal/request of the appellant was accepted and the appellant was transferred from the post of Sub-Divisional Education Officer (BS-17) Bahrain Swat to Sub-Divisional Education Officer (BS-17) (Male) Karak while the private respondent was transferred from the post of Sub-Divisional Education Officer (BS-17) (Male) Karak to the post of Sub-Divisional Education Officer (BS-17) Bahrain Karak at the place of appellant vide order dated 13.11.2018. The record further reveals that the private respondent challenged the said order dated 13.11.2018 through Writ Petition before the worthy High Court and the said Writ Petition of the private respondent was treated as departmental appeal and the worthy High Court directed the respondent-department to decide the same in accordance with law and thereafter the private respondent was transferred from the post of Sub-Divisional Education Officer (BS-17) Bahrain Swat to the post of Sub-Divisional Education Officer (BS-17) (Male) Karak at the place of appellant while the appellant was transferred as Sub-Divisional Education Officer (BS-17) (Male) Karak to the post of Sub-Divisional Education Officer (BS-17) Bahrain Swat vide order dated 07.02.2019. The record further reveals that though the appellant has claimed that his wife is serving in District Karak and he also having minor four childrens and have sought cancellation of the impugned transfer order on the basis of spouse policy but the perusal of the record also reveals that private respondent also having three minor childrens and family in the said district and has claimed that he has no male member to look after them. Moreover, after the promotion order dated 26.09.2018 of both the appellant and private respondent, the appellant was adjusted as Sub-

*M. Amman*  
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Divisional Education Officer (BS-17) Bahrain Swat while the private respondent was adjusted as Sub-Divisional Education Officer (BS-17) (Male) Karak but just after 15 days, the appellant was transfer to the post of private respondent while the private respondent was posted at the place of appellant vide order dated 13.11.2018 meaning thereby that the said transfer posting order of the appellant and the private respondent was not passed by the competent authority as per law therefore, the appellant and private respondent were rightly transferred vide order dated 07.02.2019. Moreover, under Section-10 of the Civil Servants Act, 1973, the competent authority is empowered to transfer a civil servant from one place to another place to meet the exigency of service on administration provided the terms and conditions of services were not adversely affected. Moreover, the civil servant has no vested right to claim posting or transfer to any particular place at his choice nor did he have any right to continue to hold at particular post at a particular place therefore, transfer posting order dated 07.02.2019 was rightly passed by the competent authority. Hence, the appeal has no force which his hereby dismissed. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED  
12.09.2019



(HUSSAIN SHAH)  
MEMBER

  
(MUHAMMAD AMIN KHAN KUNDI)  
MEMBER

22.08.2019

Appellant alongwith his counsel present. Mr. Kabirullah Khattak,  
Additional Advocate General on behalf of official respondents No. 1 to 3

present. Arguments heard. To come up for order on

09.09.2019 before D.B. In the mean while best train

judgment consistin  
order will be come next

beat the  
(Hussain Shah)

Member

no record  
(M. Amin Khan Kundi)

Member

06.09.2019

Since 9<sup>th</sup> & 10<sup>th</sup> September 2019 has been declared as public  
holiday on account of Muharram-ul-Haram, therefore, the case is  
adjourned to 12.09.2019.

Reader

12.09.2019

Appellant alongwith his counsel present. Mr. Kabirullah Khattak,  
Additional Advocate General on behalf of official respondents No. 1 to 3  
and counsel for private respondent No. 4 present. Arguments heard and  
record perused.

Vide our detailed judgment of today consisting of seven pages  
placed on file, the appeal has no force which his hereby dismissed. Parties  
are left to bear their own costs. File be consigned to the record room.

ANNOUNCED

12.09.2019



(HUSSAIN SHAH)  
MEMBER

  
(MUHAMMAD AMIN KHAN KUNDI)  
MEMBER



09.08.2019 Appellant in person present.. Clerk to counsel for the appellant present. Mr. Muhammad Jan learned Deputy District Attorney for official respondents present. Learned counsel for private respondent also present. Arguments could not heard due to non-availability of learned counsel for the appellant. Transfer posting order has been made impugned in the present service appeal. As such, adjourned by way of last chance on the payment of cost of Rs.3000/-to be paid by the appellant to private respondent. Adjourned to 16.08.2019 before D.B

  
Member

  
Member

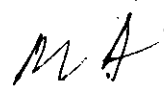
16.08.2019

Appellant in person present. Mr. Muhammad Jan, Deputy District Attorney for official respondents No. 1 to 3 and private respondent No. 4 alongwith his counsel present.

Vide previous order sheet dated 09.08.2019, the case was adjournment due to non-availability of learned counsel for the appellant by this Tribunal by way of last chance on the payment of cost of Rs. 3000/-. Today, the appellant paid Rs. 3000/- to the private respondent No. 4 and private respondent No. 4 also submitted receipt of the same, which is placed on record.

Today, the appellant requested for adjournment on the ground of non-availability of his counsel. Adjourned to 22.08.2019 for arguments before D.B but as another last chance. The restraint order already granted vide order sheet dated 25.04.2018 shall continue till the next date.

  
(HUSSAIN SHAH)  
MEMBER

  
(MUHAMMAD AMIN KUNDI)  
MEMBER

19.06.2019

Appellant in person, Mr. Kabirullah Khattak, Additional AG alongwith Mr. Sahkeel, Superintendent for official respondents No. 1 to 3 and private respondent No. 4 in person present. Representative of the department submitted written reply on behalf of respondents No. 1 & 2 and he also stated at the bar that he rely on the written reply submitted by respondents No. 1 & 2 on behalf of respondent No. 3. Private respondent No. 4 has already submitted his written reply. Case to come up for rejoinder and arguments on 03.07.2019 before D.B.

  
(Muhammad Amin Khan Kundi)  
Member

03.07.2019.

*The bench is incomplete therefore,  
the case is adjourned to 29.07.2019.*

  
Reader.

29.07.2019 Learned counsel for the appellant and Mr. Zia Ullah learned Deputy District Attorney present. Learned counsel for the appellant submitted rejoinder which is placed on file. Adjournment requested. Adjourn. To come up for arguments on 09.08.2019 before D.B.

  
Member

  
Member

10.05.2019

Appellant in person present. Mr. Usman Ghani, District Attorney alongwith M/S Sher-ul-Islam, ADEO (Karak) and Shakeel Ahmad, Superintendent for official respondents No. 1 to 3 present and requested for further time to file written reply. Mr. Khalid Rehman, Advocate for private respondent No. 4 also present and submitted his Wakalt Nama alongwith written reply. Adjourned. To come up for written reply/comments on 24.05.2019 before S.B. The restraint order shall continue till the date fixed.

  
(MUHAMMAD AMIN KHAN KUNDI)  
MEMBER

23.05.2019

Appellant in person present. Written reply not submitted. M/S Shakeel Ahmad Superintendent (for respondent No.2) and Sher Islam ADO (for respondent No.3) present and seek time for reply. Khalid Rehman Advocate leaned counsel for respondent No.4 present. Adjourn. To come up for reply/comments on 30.05.2019 before S.B.

  
Member

30.05.2019

Counsel for the appellant, Addl. AG alongwith Shakeel Ahmad, Superintendent for respondents No. 1 to 3 and private respondent No. 4 in person present.


The representative of respondents No. 1 to 3 made a request for adjournment in order to submit the requisite reply. Adjourned to 19.06.2019 for submission of written reply/comments as a last chance.

  
Chairman

25.04.2018

Counsel for the appellant present. Preliminary arguments heard and case file perused. Learned counsel for the appellant argued that vide order dated 26.09.2018, he was posted as SDEO (BPS-17) at Bahrain, Swat. Taking benefit of the spouse policy, he submitted an appeal against the said order which was accepted and order referred to above was withdrawn by posting him as SDEO (M) Karak vide order dated 13.11.2018. After a lapse of eighty days he was again transferred from SDEO (M), Karak to SDEO (M), Bahrain, Swat vide order dated 03.02.2019. He filed departmental appeal on 11.02.2019 which was rejected on 10.04.2019, hence, the present service appeal. Premature transfer of the appellant is against the law and rules. A separate application for suspension of operation of impugned order dated 07.02.2019 has also been submitted.

Points urged need consideration. Admit, subject to deposit of security and process fee within 10 days, thereafter, notices be issued to the respondents for written reply/comments for 10.05.2019 before S.B. Till then the operation of impugned order dated 07.02.2019 is suspended.

  
Appellant's Deposited  
Security & Process Fee

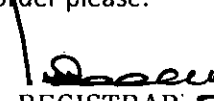
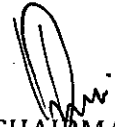
  
(AHMAD HASSAN)  
MEMBER

Form- A

FORM OF ORDER SHEET

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

Case No. 511/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	17/04/2019	<p>The appeal of Mr. Gul Faraz presented today by Mr. Muhammad Asif Yousafzai Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR - 17/4/19</p>
2-	22/04/19	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>25/04/19</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
PESHAWAR.

Appeal No. 511 /2019

Gul Faraz

V/S

Education Deptt:

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4.	Copy of and adjustment order.	- B -	09-14
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7.	Copy impugned transfer order	-E-	18
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*Gul Faraz*  
APPELLANT  
Gul Faraz

THROUGH:

*M. Asif Yousafzai*  
(M. ASIF YOUSAFZAI)  
ADVOCATE SUPREME COURT  
&  
*Syed Noman Ali Bukhari*  
(SYED NOMAN ALI BUKHARI)  
ADVOCATE HIGH COURT

Date: 16/04/2019

①

**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR**

APPEAL NO. 511 /2019

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 623

Dated 17/4/2019

Mr. Gul Faraz, (BS-17),  
SDEO (Male) Bahrain Swat.

(APPELLANT)

VERSUS

1. The Chief Secretary KPK, Civil Secretariat, Peshawar.
2. The Secretary to Govt: (E&SE) Deptt:, KPK, Peshawar.
3. The Executive District Officer School & literacy Karak.
4. Mr. Muhammad Farooq, SDEO (BS-17), (Male) karak.

(RESPONDENTS)

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APPEAL UNDER SECTION 4 OF THE SERVICE TRIBUNALS ACT, 1974 AGAINST THE ORDER DATED 07.02.2019 WHEREBY THE APPELLANT WAS TRANSFERRED PREMATURELY, UTTER VIOLATION OF POSTING TRANSFER POLICY AND AGAINST THE SPOUSE POLICY, AND AGAINST REJECTION ORDER DATED 10.04.2019 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT WAS REJECTED FOR NO GOOD GROUNDS.

**PRAYER:**

THAT THE ACCEPTANCE OF THIS APPEAL, THE IMPUGNED ORDER DATED 07.02.2019 and 10.04.2019, MAY BE SET ASIDE TO THE EXTENT OF THE APPELLANT BEING, PASSED PREMATURELY AND VIOLATION OF POSTING/TRANSFER & SPOUSE POLICY. THE RESPONDENT DEPTT: MAY FURTHER PLEASE BE DIRECTED NOT TO TRANSFER THE APPELLANT PREMATURELY AND IN VIOLATION OF POSTING/TRANSFER & SPOUSE POLICY. ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.

Filed to-day  
Registrar  
17/4/2019

**RESPECTFULLY SHEWETH:****FACTS:**

1. That the appellant was promoted as SDEO (BS-17) vide order dated 26.09.2018 and posted as SDEO (BS-17) at Bahrain Swat station vide order dated 29.10.2018. **Copy of order and posting order are attached as Annexure-A & B.**
2. That the appellant filed departmental appeal on 30.10.2018 against the order dated 29.10.2018 on basis of Spouse Policy. On the said appeal the appellant was transfer on the basis of Spouse Policy to the station of Karak against the post of SDEO (Male) vide order dated 13.11.2018. **Copy of the Departmental appeal and transfer order is attached as annexure-C & D.**
3. That the appellant was again transferred just after about 80 days from from SDEO (Male) Karak to SDEO (Male) Bahrain Swat vide order dated 07.02.2019 despite the fact that the appellant's wife was serving as SCT (BS-16) at GGHSS Karak Station and also having three minor Daughters and one minor Son the age of 9 year no other male family member is available to look after the family. **Copy of the impugned transfer order, wife appointment order, pay slip and service certificate is attached as Annexure-E & F.**
4. That the appellant feeling aggrieved from the impugned order dated 07.02.2019 filed departmental appeal which was also rejected vide order dated 10.04.2019 without mentioning reason. **Copy of departmental appeal and rejection order is attached as annexure-G & H.**
5. That the appellant has no other remedy but to come this august Tribunal on the basis of following grounds amongst others.

**GROUND:**

- A) That the impugned order dated 07-02-2019 and 10.04.2019 is against the law, facts, norms of justice, premature, violation of spouse policy, violation of Govt: circulars, therefore not tenable and liable to be set aside.
- B) That the appellant's tenure at Karak Peshawar was not Completed ~~yet~~, Therefore, the order dated 07-02-2019 is premature and against the transfer policy.



- C) That the appellant was again transferred just after about 80 days from SDEO (Male) Karak to SDEO (Male) Bahrain Swat vide order dated 07.02.2019 despite the fact that the appellant's wife was serving as SCT (BS-16) at GGHSS Karak Station and also having three minor Daughters and one minor Son the age of 9 year no other male family member is available to look after the family. So the impugned transfer order of the appellant was against the spouse policy as well as posting transfer policy and also premature.
- D) That the appellant have 3 daughters whom are minor and having beside good ground of wedlock policy the appellant's wife is seriously ill and under continuous treatment so in such like situation the transfer of the appellant to far flung area like Swat will also affect the routine life, treatment of her wife and education of the children of the appellant. **Copy of medical prescription is attached as annexure-I**
- E) That the impugned order was also not tenable on the humanitarian ground as mention above in para-D. Further it is added that the Hon'ble Tribunal already accepted the same nature appeal no: 22/2018, so the present appellant also need the same treatment. **Copy of the judgment is attached as Annexure-J.**
- F) That the impugned order has been passed in violation of spouse policy which is not tenable in the eyes of law. **Copy of Policy is attached as Annexure-K.**
- G) That the impugned order is not a rational one and based on personal liking and disliking.
- H) That according to posting transfer policy, normal tenure for posting is 2 years, but the appellant transferred order was passed before completion of normal tenure, which is total violation of Govt: posting transfer policy. Thus the impugned transfer order is liable to be set-aside on this score alone. **Copy of posting transfer Policy is attached as Annexure-L.**
- I) That the transfer of the appellant is also violation of circular based on the Anita Turab case dated 27.2.2013 in which it was clearly mentioned that when the ordinary tenure for a

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, but in the case of the appellant the tenure was not respected and was posted/ transferred without completing his normal tenure and also in violation of spouse policy. **Copy of Circular is attached as Annexure-M.**

- J) That no reasons have been mentioned in the order dated 10.04.2019 which is the violation of Clause-24-A of the General Clauses Act 1897.
- K) That the appellant seeks permission to advance others grounds and proofs at the time of hearing.

It is, therefore, most humbly prayed that the appeal of the appellant maybe accepted as prayed for.

*Gul Faraz*  
APPELLANT  
Gul Faraz

THROUGH:

*M. Asif Yousafzai*  
(M. ASIF YOUSAFZAI)  
ADVOCATE SUPREME COURT

&  
*Syed Noman Ali Bukhari*  
(SYED NOMAN ALI BUKHARI)  
ADVOCATE HIGH COURT

Date:16/04/2019

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

Appeal No. \_\_\_\_\_/2019

Gul Faraz

V/S

Education Deptt:

.....

**APPLICATION FOR SUSPENSION OF  
OPERATION OF ORDER DATED  
07.02.2019 TO THE EXTENT OF  
APPELLANT TILL THE DISPOSAL OF  
MAIN APPEAL.**

**RESPECTFULLY SHEWETH:**

1. That the appellant has filed an Appeal along-with application in which no date has been fixed so far.
2. That the appellant has good prime facie case and all the ingredients of stay is in favour of appellant.
3. That the grounds of main appeal may also be considered as integral part of this application.
4. That the impugned order has passed on favouritism and nepotism and has been passed in-violation of Posting, Transfer Policy.
5. That the appellant has not completed his tenure and the order dated 07.2.2019 is also in violation of spouse policy.

6. That if the order dated 07.02.2019 is not suspended. It badly effect the right of appellant.

It is, therefore, most humbly prayed that the order dated 07.02.2019 may be suspended till the disposal of main appeal. Any other remedy, which this august tribunal deems fit that may also be awarded in favour of appellant.

*Gul Faraz*  
APPELLANT  
Gul Faraz

THROUGH:

*M. Asif Yousafzai*  
(M. ASIF YOUSAFZAI)  
ADVOCATE SUPREME COURT  
&  
*Syed Noman Ali Bukhari*  
(SYED NOMAN ALI BUKHARI)  
ADVOCATE HIGH COURT

**AFFIDAVIT:**

It is affirmed and declared that the contents of this Application are true and correct to the best of my knowledge and belief.

*[Signature]*  
DEPONENT



# GOVERNMENT OF KHYBER PAKHTUNKHWA

ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar  
Phone: 091-9210480, Fax # 091-9211419

Dated Peshawar the September 26, 2018.

## NOTIFICATION

NO.SO(SME&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17): Consequent upon the recommendation of Departmental Promotion Committee, the Competent Authority/Chief Secretary Khyber Pakhtunkhwa is pleased to promote the following fifty nine (59) Assistant Sub-Divisional Education Officers/ Assistant District Education Officers (BS-16) to the post of Sub-Divisional Education Officers/ Assistant Directors (BS-17) (Management Cadre) in the Elementary & Secondary Education Department on regular basis with immediate effect:

S.No.	Name of Officer	S.No.	Name of Officer
1	Gulam Habib	2	Mehboob Elahi
3	Muhammad Farooq	4	Abdul Qayyum Khan
5	Muhammad Zahid Khan	6	Shams-ul-Islam Niaz
7	Sharafat Khan	8	Mehmood Iqbal
9	Muhammad Irshad	10	Muhammad Anwar
11	Zia Ullah	12	Shams Ur Rehman
13	Iftikhar Ahmed	14	Ghulam Sarwar
15	Muhammad Zubair	16	Fazali Khuda
17	Muhammad Rehmat Shah	18	Muhammad Sohail Khan
19	Ali Haider	20	Muhammad Raza Shah
21	Muhammad Islam	22	Dil Nawaz Khan
23	Fida Muhammad	24	Muhammad Aftab
25	Hayat Khan	26	Muhammad Ajmal
27	Salih Muhammad	28	Waheedullah Shah
29	Khalid Naseem	30	Gul Faraz
31	Abdur Rehman Rashid	32	Abdul Wahab
33	Imtiaz Khan	34	Hameedullah
35	Muhammad Abid	36	Muhammad Azam
37	Raees Khan	38	Adil Muhammad
39	Shah Jehan Khan	40	Love Dan
41	Amir Badshah	42	Muhammad Hamayun
43	Niaz Wali Khan	44	Muhammad Saleem
45	Shafiq Ur Rehman	46	Ahmed Ullah

working as SDEO  
Saidu Sharif, Swat  
mg Cadre

Saidu  
Swat

Shanf,

SS (Eng) BS-17  
GHSS Niaz

Against



# GOVERNMENT OF KHYBER PAKHTUNKHWA

ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar  
Phone: 091-9210480, Fax # 091-9211419

47	Raees ur Rehman	48	Muhammad Zarif
49	Muhammad Tariq	50	Hamid Rasool
51	Qadir Shah	52	Muhammad Arshad
53	Irshad Khan	54	Syed Attaullah Shah
55	Shehzad Nadeem	56	Habib ur Rehman
57	Abdul Samad	58	Chanzeb
59	Raja Babu Jahangir		

2. In terms of Section 6(2) of Khyber Pakhtunkhwa Civil Servant Act, 1973 read with rule-15(1) of the Khyber Pakhtunkhwa Civil Servant (Appointment, Promotion & Transfer) rules, 1989, the above named officers, on their promotion, shall be on probation for a period of one year extendable for further one year as per rules.

3. Adjustment of the above named officers shall be notified later on.

SECRETARY  
E&SE Department  
Khyber Pakhtunkhwa

Endst: of even No. & Date :-

Copy forwarded to the:

1. Accountant General Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officers (Male) Concerned.
4. District Accounts Officers Concerned.
5. PS to Chief Secretary Khyber Pakhtunkhwa, Peshawar.
6. PS to Minister E&SE Khyber Pakhtunkhwa Peshawar.
7. In-charge EMIS, E&SE Department for uploading at official website.
8. PS to Secretary E&SE Department, Khyber Pakhtunkhwa.
9. Officers concerned.
10. Office order file.

*Mian Hussain Din* 26/9/018  
(MIAN HUSSAIN DIN)  
SECTION OFFICER (SCHOOLS MALE)

**ATTESTED**



B  
9

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

Dated Peshawar the October 29, 2018.

**NOTIFICATION**

**NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17):**

Consequent upon their promotion to the post of Sub-Divisional Education Officer Male (BS-17) vide notification of even number dated 26.09.2018, the following SDEOs are hereby posted/adjusted on the posts & stations as mentioned against each:

S#	Name of candidate	Posted as
1	Mr. Zia Ullah	Assistant Director (BS-17), Directorate of E&SE
2	Mr. Shah Jehan Khan	Assistant Director (BS-17), Directorate of E&SE
3	Mr. Muhammad Arshad	Assistant Director (BS-17), Directorate of E&SE
4	Mr. Irshad Khan	SDEO (BS-17) Town-IV Peshawar
5	Mr. Muhammad Zahid Khan	Assistant Director (BS-17), Directorate of E&SE
6	Mr. Muhammad Sohail Khan	Assistant Director (BS-17), Directorate of E&SE
7	Mr. Muhammad Aftab	Assistant Director (BS-17), Directorate of E&SE
8	Mr. Imtiaz Khan	SDEO (BS-17) Swat
9	Mr. Muhammad Saleem	SDEO (BS-17) Pabbi Nowshera
10	Mr. Shams-ul-Islam Niaz	SDEO (BS-17) Kabal Swat
11	Mr. Muhammad Zubair	SDEO (BS-17) Takhtbai Mardan
12	Mr. Hayat Khan	Assistant Director (BS-17), Directorate of E&SE
13	Mr. Ahmad Ullah	SDEO (BS-17) Shabqadar
14	Mr. Muhammad Anwar	SDEO (BS-17) Mardan
15	Mr. Fazi-e-Khuda	SDEO (BS-17) Khadokhel Buner
16	Mr. Amir Badshah	SDEO (BS-17) Mandan Buner
17	Mr. Fida Muhammad	SDEO (BS-17) Town-III Peshawar
18	Mr. Salih Muhammad	SDEO (BS-17) Daggar Buner
19	Mr. Abdul Wahab	SDEO (BS-17) Lahore Swabi
20	Mr. Muhammad Abid	SDEO (BS-17) Rajjar Swabi
21	Mr. Adil Muhammad	SDEO (BS-17) Katlang Mardan
22	Mr. Niaz Wali Khan	SDEO (BS-17) Ghazi Haripur

*A. N. Khan*

**APPROVED**

*[Signature]*



(70)

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

23	Mr. Mehboob Elahi	Assistant Director (BS-17), Directorate of E&SE
24	Mr. Shehzad Nadeem	SDEO (BS-17) Darosh Chitral
25	Mr. Muhammad Farooq	SDEO (BS-17) Karak
26	Mr. Dil Nawaz	SDEO (BS-17) Kohistan
27	Mr. Gul Faraz	SDEO (BS-17) Bahrain Swat
28	Mr. Muhammad Humayun	SDEO (BS-17) Daraban D.I. Khan
29	Mr. Abdul Qayum Khan	Assistant Director (BS-17), Directorate of E&SE
30	Mr. Iftikhar Ahmed	SDEO (BS-17) Battagram
31	Mr. Chanzeb	SDEO (BS-17) Alai Battagram
32	Mr. Sharafat Khan	SDEO (BS-17) Bisham Shangla
33	Mr. Mehmood Iqbal	SDEO (BS-17) Paharpur D.I. Khan
34	Mr. Khalid Naseem	SDEO (BS-17) Prova D.I. Khan
35	Mr. Muhammad Zarif	SDEO (BS-17) D.I. Khan
36	Mr. Muhammad Irshad	SDEO (BS-17) Tall Hangu
37	Mr. Muhammad Rehman Shah	SDEO (BS-17) Bakka Khel Bannu
38	Mr. Waheed Ullah Shah	SDEO (BS-17) Domel Bannu
39	Mr. Muhammad Tariq	Assistant Director (BS-17), Directorate of E&SE
40	Mr. Hamid Rasool	SDEO (BS-17) Bannu
41	Mr. Ali Haider	SDEO (BS-17) Samar Bagh Dir Lower
42	Mr. Muhammad Raza Shah	SDEO (BS-17) Adenzai Dir Lower
43	Mr. Muhammad Islam	SDEO (BS-17) Munda Dir Lower
44	Mr. Muhammad Ajmal	SDEO (BS-17) Oghi Mansehra
45	Mr. Shafiq Ur Rehman	SDEO (BS-17) Darban Mansehra
46	Mr. Raees Ur rehman	Assistant Director (BS-17), Directorate of E&SE
47	Mr. Abdus Samad	SDEO (BS-17) Baffa Mansehra
48	Mr. Raja Babu Jehangir	Assistant Director (BS-17), Directorate of E&SE
49	Mr. Shams Ur Rehman	SDEO (BS-17) Balakot Mansehra
50	Mr. Abdur Rehman Rashid	SDEO (BS-17) Serai Naurang Lakki Marwat
51	Mr. Qadir Shah	SDEO (BS-17) Lakki Marwat
52	Mr. Habib Ur Rehman	SDEO (BS-17) Kulachi D.I. Khan

*Handwritten signature*

**ATTACHED**





(11)

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

53	Mr. Hameed Ullah	SDEO (BS-17) Palas Kohistan
54	Mr. Muhammad Azam	SDEO (BS-17) Sedu Sharif Swat
55	Mr. Ghulam Sarwar	SDEO (BS-17) Balambat Dir Lower
56	Mr. Ghulam Habib	SDEO (BS-17) Dir Lower
57	Syed Atta Ullah Shah	Assistant Director (BS-17), Directorate of E&SE
58	Mr. Raees Khan	SDEO (BS-17) Matta Swat
59	Mr. Love Dan	SDEO (BS-17) Sheringal Dir Upper

**CONSEQUENTIAL TRANSFER**

S.No	Name of candidate	Posted as
60	Mr. Muhammad Arif, SS (Economics) BS-17 working as SDEO (M) Town-IV	SS (Economics) BS-17 GHSS Nizampur, Nowshera
61	Mr. Ghazi Bacha SS (Maths) BS-17 working as SDEO (M), Lahore Swabi	SS (Maths) BS-17 GHSS Kabgani, Swabi
62	Mr. Wisal Muhammad HM BS-17 working as SDEO (M) Katlang Mardan	HM BS-17 GHS Sohbat Abad, Mardan
63	Mr. Abdul Haleem SS (Islamiat) BS-17 working as SDEO (M) Mardan	SS (Islamiat) BS-17 GHSS Gujar Garhi, Mardan
64	Syed Arshad Hussain Shah SS (English) BS-17 working as SDEO (M) Takht Bhai, Mardan	Instructor (BS-17) RITE (Male) Mardan
65	Mr. Fazle Khaliq SS (English) BS-17 working as SDEO (M) Saidu Sharif, Swat	SS (English) BS-17 GHSS Miandam, Swat
66	Mr. Inyat Ullah HM BS-17 working as SDEO (M) Matta Swat	HM BS-17 GHS Sambat Swat
67	Mr. Inyat Ullah HM BS-17 working as SDEO (M) Charbagh Swat	HM BS-17 GHS Manpatai Swat
68	Mr. Liaqat Ali HM BS-17 working as SDEO (M) Khawaza Khela Swat	HM BS-17 GHS Laikot Swat
69	Mr. Majeed Ullah HM BS-17 working as SDEO (M) Kabal Swat	HM BS-17 GHS Ghalooch Swat
70	Mr. Muhammad Zahid SS (Statistics) BS-17 working as SDEO (M) Puran Shangla	SS (Statistics) BS-17 GHSS Butyal Shangla

*[Handwritten signature]*

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GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DIRECTORATE OF



(12)

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

71	Mr. Muhammad Pervez DPE BS-17 working as SDEO (M) Shangla	DPE BS-17 GHSS Olandar Shangla
72	Mr. Akhtar Naeem SS (Urdu) BS-17 working as SDEO (M) Basham, Shangla	SS (Urdu) BS-17 GHSS Shahpur Shangla
73	Mr. Rehman UI Mulk SS (Pak- Study) BS-17 working as SDEO (M) Lal Qilla, Dir Lower	SS (Pak-Study) BS-17 GHSS Akhagaram Dir Upper
74	Mr. Sadiq Jan SS (Urdu) BS-17 working as SDEO (M) Balambat Dir Lower	SS (Urdu) BS-17 GHSS Pachakalay Dir Upper
75	Mr. Hameed Ur Rehman HM BS-17 working as SDEO (M) Samar Bagh Dir Lower	HM BS-17 GHS Kumber Dir Lower
76	Mr. Raza Shah ADEO BS-16 working as SDEO (M) Munda Dir Lower	Services placed at the disposal of Directorate E&SE KPK
77	Mr. Muhammad Zafar HM BS-17 working as SDEO (M) Temergrah Dir	HM BS-17 GHS Badin Dir Lower
78	Mr. Mehboob Ur Rab SST BS- 16 working as SDEO (M) Sheringal Dir Upper	Services placed at the disposal of DEO (M) Dir Upper
79	Mr. Habib Ullah, HM BS-17 working as SDEO (M) Laachi Kohat	HM BS-17 GHS Pakka Topi, Kohat
80	Mr. Muhammad Naeem Shah HM BS-17 working as SDEO (M) Tall Hangu	HM BS-17 GHS Sarozai Hangu
81	Mr. Tariq Javed SS (Chemistry) BS-17 working as SDEO (M) D.I. Khan	SS (Chemistry) BS-17 GHSS Darban Kalan, D.I. Khan
82	Mr. Mirza Khan SS (English) BS-17 working as SDEO (M) Phar Pur D.I. Khan	SS (English) BS-17 GHSS Abdul Kkheil D.I. Khan
83	Mr. Zain Ullah Khan SS (Chemistry) BS-17 working as SDEO (M) Prova D.I. Khan	SS (Chemistry) BS-17 GHSS No.2 D.I. Khan
84	Mr. Muhammad Khalid HM BS-17 working as SDEO (M) Kulachi D.I. Khan	HM BS-17 GHS Budd D.I. Khan
85	Mr. Saif UI Malook HM BS-17 working as SDEO (M) Palas Kohistan	HM BS-17 GHS Shore Kot Kohistan
86	Mr. Muhammad Nawab SST BS-16 working as SDEO (M) Pattan, Kohistan	Services placed at disposal of DEO (M) Kohistan

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**ATTACHED**



(13)

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

87	Mr. Fazal Qayum SS (Pashto) BS-17 working as SDEO (M) Kohistan	SS (Pashto) BS-17 GHSS Sakhara, Swat
88	Mr. Abdur Rauf SS (Urdu) BS-17 working as SDEO (M) Khudo Khail, Buner	SS(Urdu) BS-17 GHSS Nogram, Buner
89	Mr. Ikhtiyar Ahmed SS (English) BS-17 working as SDEO (M) Mandan Buner	SS (English) BS-17 GHSS Agarai, Buner
90	Mr. Bakht Sher Hussain HM BS-17 working as SDEO (M) Gagara Buner	HM BS-17 GHS Rega Buner
91	Mr. Ayub Khan HM BS-17 working as SDEO (M) Dagar Buner	HM BS-17 GHS Anar Baig Mardan
92	Mr. Mir Samad ASDEO BS-16 working as SDEO (M) Batagaram	Services placed at disposal of Directorate of E&SE KPK
93	Mr. Sherferoz SST BS-16 working as SDEO (M) Alai Batagaram	Services placed at the disposal of DEO(M) Batagaram
94	Mr. Shabir Ahmed HM BS-17 working as SDEO (M) Baffa Mansehra,	HM BS-17 GHS Darband (New) Mansehra
95	Mr. Abid Hussain, HM BS-17 working as SDEO (M) Ghazi Haripur	HM BS-17 GHS Chintari Haripur
96	Mr. Aman Ullah HM BS-17 working as SDEO (M) Bannu	HM BS-17 GHS Bilawar Khan Bannu
97	Mr. Akhtar Zaman HM BS-17 working as SDEO (M) Lakki Marwat	HM BS-17 GHS Shukrullah Hussain, Bannu
98	Mr. Muhammad Shafiq HM BS-17 working as SDEO (M) Sarai Naurang, Lakki Marwat	HM BS-17 GHS Nowar Khel Lakki Marwat
99	Mr. Raja Sheraz Ahmed HM BS-17 working as SDEO (M) Torghar	HM BS-17 GHS Judba Torghar
100	Mr. Sanaullah SS (Maths) BS-17 working as assistant Director	SS (Maths) BS-17 GHSS No.1 Peshawar City
101	Mr. Iqbal Hussain SS (Pashtu) BS-17 working as Assistant Director	SS (Pashto) BS-17GHSS No.1 Peshawar City
102	Mr. Abdul Qayyum ADEO BS-16 working as Assistant Director Directorate of E&SE	Services placed at disposal of Director E&SE KPK for further posting

**ATTESTED**



(14)

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

103	Mr. Hameed Ur Rehman ADEO BS-16 working as Assistant Director, Directorate of E&SE	Services placed at disposal of Directorate E&SE KPK for further posting
104	Mr. Aziz Ul Haq SS (Maths) BS-17 working as Assistant Director, Directorate of E&SE KPK	SS (Maths) BS-17 GHSS Manga Mardan
105	Mr. Hamood Ur Rehman ADEO BS-16 working as Assistant Director BS-17, Directorate of E&SE KPK	Services placed at disposal of Directorate E&SE KPK for further posting.
106	Mr. Azim Khan ADEO BS-16 working as Assistant Director BS-17 Directorate of E&SE KPK	Services placed at disposal of Directorate E&SE KPK for further posting.
107	Mr. Muhammad Ilyas, SDEO BS-17 working as AD BS-17 at Directorate of E&SE.	SDEO BS-17 Lachi Kohat
108	Mr. Abdur Rehman, SDEO BS-17 Topi Swabi	Services placed at disposal of Directorate E&SE KPK for further posting.
109	Mr. Shahid Lodan, SDEO (BS-17) Wari Dir Upper	Services placed at disposal of Directorate E&SE KPK for further posting.
110	Mr. Amin Zada, SS (BS-17) GHS Akhwagram Dir Upper	SDEO (BS-17) Wari Dir Upper

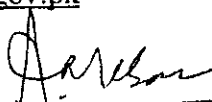
2. No TA/DA is allowed.

**SECRETARY**

Endst: of even No. & Date

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar
3. District Education Officers (Male), Concerned.
4. District Account Officers, Concerned.
5. PS to Chief Secretary, Khyber Pakhtunkhwa.
6. PS to Advisor to CM for E&SE Department.
7. PS to Secretary E&SE Department.
8. PA to Additional Secretary (Estab), E&SE Department.
9. PA to Deputy Secretary (Admn), E&SE Department.
10. In-charge EMIS E&SE Department with the request to upload it on the website of the Department i.e. [www.kpese.gov.pk](http://www.kpese.gov.pk)
11. SDEOs Concerned.
12. Master file.

  
(ANWAR AKBAR KHAN) 29/11/18  
**SECTION OFFICER (SCHOOLS MALE)**

**ATTACHED**

To

The Secretary,  
Khyber Pakhtunkhwa E&SE Department  
Peshawar.

Subject: - APPEAL/REQUEST FOR ADJUSTMENT AS SDEO (M) UNDER SPOUSE POLICY.

R/Sir,

Most respectfully it is stated that I have been recently promoted and posted as SDEO(M) BPS-17 Behrain Swat vide your good office Notification-Endst: No. SO(S/M) E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dated 29.10.2018. I am permanent resident of District Karak and my wife/Spouse is working as CT (BS-15) at GGMS Karak (Service Certificate attached).

I have school going Kids and I have been posted for away from my home District it will affect my domestic setup and may cause problems for me and my family.

It is therefore, humbly requested that I may kindly be adjusted at the following Districts which are nearest to my under-Spouse Policy please.


1. District Karak (Home District).  
(SDEO(M) Karak, SDEO(M) B.D Shah & SDEO(M) Takht-e-Nasratti)
2. District Kohat (SDEO(M) Kohat).

I will remain thankful to your for this kind action please.

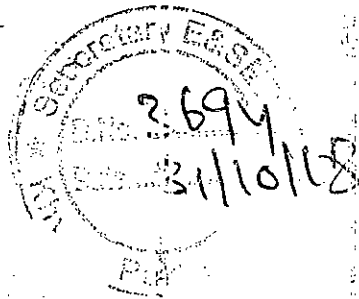
Service certificate & Pay slip is attached.

Dated 30.10.2018

Yours faithfully,

  
 Mr. Gul Faraz 30/10/2018  
 SDEO(M) Behrain Swat.

SO(S/M)  
 [Signature]  
 31/10



ATTACHED



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

(12)

Dated Peshawar the February 07, 2019

**NOTIFICATION**

**NO.SO(SM)E&SED/2-1/2019/Posting/Transfer/MC:** The Competent Authority is pleased to order posting/transfer of the following officers of Management Cadre/Teaching Cadre on the posts/stations as mentioned against each. in the interest of public service, with immediate effect:

S#	Name & Designation	From	Posted as	Remarks
1	Mst. Naheed Akhtar, HM (BS-17)	GGHS Thathal D.I. Khan	HM (BS-17) GGHS Malana D.I. Khan	w.e.f 11.02.2019
2	Mr. Muhammad Farooq, SDEO (BS-17)	SDEO (Male) Bahrain Swat	SDEO (Male) Karak	V.S#3
3	Mr. Gul Faraz, SDEO (BS-17)	SDEO (Male) Karak	SDEO (Male) Bahrain Swat	V.S#2

2. No TA/DA is allowed.

SECRETARY

Endst: of Even No. & Date:

Copy forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director E&SE, Khyber Pakhtunkhwa, Peshawar
3. District Education Officers (Male & Female), Concerned.
4. District Accounts Officers, Concerned.
5. PS to Advisor to CM for E&SE Department.
6. PS to Secretary, E&SE Department.
7. PS to Special Secretary, E&SE Department.
8. In-charge EMISE E&SE Department.
9. Officers Concerned.
10. Master file.

  
(SHABIR KHAN) 07/2/19  
SECTION OFFICER (SCHOOLS MALE)

**ATTESTED**

F

(19)

**SERVICE CERTIFICATE**

Certified that Miss: **SHERIN TAJ S.C.T B-16** has been serving in Education Department since 08-10-2007. At present she is teaching at GGHSS Karak.

*Sherin TAJ*  
2/3/2019  
**PRINCIPAL GGHSS**  
**Karak**

Countersigned by  
*TA*  
*[Signature]*  
**District Education Officer (F)**  
**Karak**  
**District Education Officer(F)**  
**Karak**

**ATTESTED**  
*[Signature]*

District Accounts Office Tax  
Monthly Salary Statement (January-2019)

*pay slip of*

21

Personal Information of Mrs SHEREEEN TAJ BEGUM d/w/s of GUL FARAZ

Personnel Number: 00385817      CNIC: 1420212787740      NTN:  
Date of Birth: 26.09.1976      Entry into Govt. Service: 05.04.1993      Length of Service: 25 Years 09 Months 028 Days

Employment Category: Vocational Temporary

Designation: CERTIFICATED TEACHER      80002677-DISTRICT GOVERNMENT KHAYBE

DDO Code: KK6015-District Officer Schools & Literacy (Middle Female) KARAK

Payroll Section: 001      GPF Section: 001      Cash Center:

GPF A/C No: 385817      Interest Applied: Yes      **GPF Balance:**      196,454.00

Vendor Number: -

**Pay and Allowances:**      Pay scale: BPS For - 2017      Pay Scale Type: Civil      BPS: 15      Pay Stage: 11

Wage type		Amount	Wage type		Amount
0001	Basic Pay	30,750.00	1000	House Rent Allowance	2,349.00
1210	Convey Allowance 2005	2,856.00	1300	Medical Allowance	1,500.00
2148	15% Adhoc Relief All-2013	670.00	2199	Adhoc Relief Allow @10%	456.00
2211	Adhoc Relief All 2016 10%	2,359.00	2224	Adhoc Relief All 2017 10%	3,075.00
2247	Adhoc Relief All 2018 10%	3,075.00			0.00

**Deductions - General**

Wage type		Amount	Wage type		Amount
3015	GPF Subscription - Rs2890	-2,890.00	3501	Benevolent Fund	-600.00
3609	Income Tax	-50.00	3990	Emp.Edu. Fund KPK	-125.00
4004	R. Benefits & Death Comp:	-1,052.00			0.00

**Deductions - Loans and Advances**

Loan	Description	Principal amount	Deduction	Balance

**Deductions - Income Tax**

Payable: 1,000.00      Recovered till JAN-2019: 350.00      Exempted: 400.00      Recoverable: 250.00

**Gross Pay (Rs.): 47,090.00      Deductions: (Rs.): -4,717.00      Net Pay: (Rs.): 42,373.00**

Payee Name: SHEREEEN TAJ BEGUM

Account Number: 20789-8

Bank Details: HABIB BANK LIMITED, 221435 KARAK KARAK, KARAK

Leaves:      Opening Balance:      Availed:      Earned:      Balance:

Permanent Address:

City: KARAK

Domicile: -

Housing Status: No Official

Temp. Address:

City:

Email: gulfaraz.ado@gmail.com

**ATTESTED**





H  
23  
GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT


No.SO(SM)E&SED/7-1/2019/SDEOs/MC  
Dated Peshawar the April 10, 2019

To


Mst. Gul Faraz,  
SDEO (BS-17) Bahrain Swat.

Subject:- APPEAL FOR CANCELLATION OF TRANSFER ORDER.

I am directed to refer to your appeal dated 11.02.2019 on the subject cited above and to state that your appeal has been examined and rejected by the Competent Authority.

  
MOHAMMAD SHOAIB  
SECTION OFFICER (SCHOOLS MALE)

Copy of the above is forwarded to the:  
1. PS to Secretary E&SE Department.

  
SECTION OFFICER (SCHOOLS MALE)

ATTESTED



# LAHORE PCR LAB<sup>®</sup> (Pvt.) Ltd.

Diagnostic & Clinical Research

Patient Number: 0078766-1001

Lab Number: 20-112018-67755

M.R. No: \_\_\_\_\_ Registration Date: 20-Nov-2018 11:17 am.  
 Patient Name: SHEREEN TAJ BEGUM Registration Location: LAHORE PCR LAB (Pvt.) Ltd.  
 Father/Husband Name: \_\_\_\_\_ Conducted at: STAR LAB BANNU \*0  
 Age / Sex: 40 Year(s)/Female Reporting Location: STAR LAB BANNU \*0  
 Mobile No: 03335531406 Sampling Location: Brought to The Lab  
 Consultant: \_\_\_\_\_ Reference: STAR LAB BANNU \*0

## ENDOCRINOLOGY REPORT

TEST	NORMAL RANGE	UNIT	RESULT
			0-112018-6775 20-Nov-2018 11:17 am
T3	0.69 - 2.15	ng/mL	1.29
T4	60.00 - 168.00	nmol/L	152.3
TSH	0.40 - 5.20	uIU/ml	0.51

**ATTESTED**

Electronically verified report. No signature(s) required

Page 1

**M. Tajammul**  
M. Phil  
B.Sc., M.Sc.  
Molecular Biologist

**Dr. Zahoor Ahmad**  
M.B.B.S. DCP, M. Phil  
CONSULTANT PATHOLOGIST

**Prof. Naseer Ahmed**  
M.B.B.S (Pb), Ph.D.  
CONSULTANT Histopathologist

**Ghulam Mustafa**  
BS (HONS) Pathology  
Teaching & Research Fellow  
Hematology Dept. (UJAS)

**DR. RIZWANA NAWAZ**  
M.B.B.S., M.Phil (Haematology)  
Consultant Haematologist  
JH/JA/IMC  
Lahore

**DR. MUHAMMAD JAMIL** M.B.B.S. D.C.P.  
M.Phil Pathologist  
STAR MEDICAL LAB (Pvt Ltd) & Diagnostic Center Bannu ( EHSAN KHATTAK 03335531406 )

577-A, FAISAL TOWN, LAHORE. TEL: (042) 35227580, MOBILE: 0333-4512008; Email: lahorelab3@gmail.com. www.lahorepcr.com.



**LAHORE PCR LAB®** (Pvt.) Ltd.  
*Diagnostic & Clinical Research*

Patient Number: 0082610-1001

25

Lab Number: 10-012019-71605

M.R. No:   
 Patient Name: **SHEREEN TAJ**   
 Father/Husband Name:   
 Age / Sex: **42 Year(s)/Female**   
 Mobile No: **03335531406**   
 Consultant:   
 Registration Date: **10-Jan-2019 10:02 am**   
 Registration Location: **LAHORE PCR LAB (Pvt.) Ltd.**   
 Conducted at: **STAR LAB BANNU \*0**   
 Reporting Location: **STAR LAB BANNU \*0**   
 Sampling Location: **Brought to The Lab**   
 Reference: **STAR LAB BANNU \*0**

**ENDOCRINOLOGY REPORT**

TEST	NORMAL RANGE	UNIT	RESULT
			0-012019-71605 10-Jan-2019 10:02 am
T3	0.69 - 2.15	ng/mL	2.01
T4	60.00 - 168.00	nmol/L	160.1
TSH	0.40 - 5.20	uIU/ml	0.29

**ATTESTED**

Electronically verified report. No signature(s) required

Page 1 of 1

**M. Tajammul**  
M. Phil  
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Molecular Biologist

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**MOHAMMAD SHEHBAZ**

B.Sc. BIOCHEMISTRY  
STAR MEDICAL LAB (Pvt Ltd) & Diagnostic Center Bannu ( EHSAN KHATTAK 03335531406 )

57-A, FAISAL TOWN, LAHORE, TEL: (942) 35227580, MOB:0333-4512002; Email: lahorelab3@gmail.com, www.lahorepcr.com

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Patient Number:

0090853-1001



# LAHORE PCR LAB<sup>®</sup> (Pvt.) Ltd.

*Diagnostic & Clinical Research*

Lab Number:

02-042019-79842

M.R. No:  
Patient Name: **SHEREN TAJ**  
Father/Husband Name:  
Age / Sex: **42 Year(s)/Female**  
Mobile No: **03335531406**  
Consultant:

Registration Date: **02-Apr-2019 11:17 am**  
Registration Location: **LAHORE PCR LAB (Pvt.) Ltd.**  
Conducted at: **STAR LAB BANNU \*0**  
Reporting Location: **STAR LAB BANNU \*0**  
Sampling Location: **Brought to The Lab**  
Reference: **STAR LAB BANNU \*0**

## ENDOCRINOLOGY REPORT

TEST	NORMAL RANGE	UNIT
TSH	0.40 - 5.20	uIU/ml

RESULT
02-042019-7984 02-Apr-2019 11:17 am

0.11

Electronically verified report. No signature(s) required

Dr. Sajid Jammal  
MBBS, DCP, M.Phil  
CONSULTANT PATHOLOGIST

**Dr. Zahoor Ahmad**  
MBBS, DCP, M.Phil  
CONSULTANT PATHOLOGIST

**Dr. M. Nadeem Sheikh**  
MBBS (Pb),  
C.P.S.M.PHIL.C.I.L.I (UK)  
CONSULTANT Histopathologist

**Ghulam Mustafa**  
BS (HONS) Pathology  
Teaching & Research Fellow  
Hematology Dept. (UHS)

**DR. RIZWANA NAWAZ**  
MBBS, M.Phil (Hematology)  
Consultant Haematologist  
JHLZ APMC Lahore.

**HAJIBAD SHEHBAZ**

LAHORE PCR LAB (Pvt.) Ltd & Diagnostic Center Bannu (EHSAN KHATTAK 03335531406)

FAISAL TOWN, LAHORE, TEL: +92(42) 35227580, MOB: 0333-4513508; Email: lahorepcr@gmail.com, www.lahorepcr.com

آہستہ آہستہ  
ہمیں جانتے ہوئے ہسپتال کے  
مقامات پر

0312-9802962



**Gul**  
Clinical Laboratory  
Opp: Women & Child  
Hospital Kanak

# Dr. Muhammad Younas Khan

M.B.B.S (Pesh) R.M.P (Pak)  
M.R.C.GP / M.C.P.S (Family Medicine)  
Ultrasound Specialist  
Medical O.P.D DHQ Hospital Karak

(Fem)



(27)

ڈاکٹر محمد یونس خان

ایم بی بی ایس (پشاور) آر ایم پی (پاک)  
ایم آر سی جی پی ایم سی پی ایس (فیمیل میڈیسن)  
الٹراساؤنڈ اسپیشلسٹ  
میڈیکل او پی ڈی ایچ ڈی ہسپتال کرک

P.Name: W/O Gul Fana 2 Age 40 Sex M Date 30/9/18

## Clinical Record

Rx

Hypertension

of mild  
severity

(Hypertension)

TSH  
T4

LFTS  
unremarkable

Hypertension  
/ H.N. / Dyslipidemia  
B. Abbas

ATTESTED

Tab (Neomurzone)  
2 + 2 + 2  
②  
1 + 1 + 1

Tab Myfalka  
10  
①

Tab Ufrim  
10  
①

Tab Sofmasc.v  
5/80  
①

Tab Somno  
5  
①

Tab ①

Tab ①

Tab RAZODAX 60  
①

اوقات کار:

وزانہ شام 3:00 بجے تا 7:00 بجے مغرب

0331-9802680

لطیف میڈیکل سٹور بالقابل وومن اینڈ چلڈرن ہسپتال کرک

Physician, Children & Ultrasound Specialist

**Dr. Muhammad Younas**

M.B.B.S (Pesh) RMP (Pak)

MCPS Family Medicine

D.H.Q Hospital Karak



98

فزیشن، چلڈرن اینڈ الراساؤنڈ سپیشلسٹ

**ڈاکٹر محمد یونس**

ایم بی بی ایس (پشاور) آر ایم پی (پاک)

ایم سی پی ایس فیملی میڈیسن

NOT VALID FOR COURT

ڈی ایچ کیو ہسپتال کرک

Name

W/O gulfamaz

Age 37

Sex F

Date

17/09/18

Clinical Record

RX

B. Atmura  
Kumar & Co

Wt

Temp

Vaccination

BCG Scar

Feeding

Thyroid Swelling

+ palpitation

irregularity

Adalat-R

comlor  
5ms

O/E

B.P. 180/120

Adv CXR Digital

TSH/T4

Sputum AFB

Laxohevan

T. Hydantoin 100mg  
280  
T. Laxohevan 40  
Tah. Leflup  
Tah. Mytka 10ms  
Syr. Mylone / Acety  
Tah. Cerferb  
Tah. Sofrasc-V  
Syr. ? 2+2  
Tah. 5/80

Cop. Am 3020

اطیاب میڈیکل اینڈ سرجیکل ہسپتال  
پشاور  
0337-9802630

اوقات کار: روزانہ 7:00 سے 8:00 بجے، شہر 3:00 سے 6:00 بجے  
روزانہ 8:00 سے 2 بجے

ATTENDED

Handwritten signature

03009117892

140/98

Tub. 2 & flex  
3 15 ① 500

①

Sp. Aegypt

2+2+2

Sp. Cereus

2+2

Tub. MYTILCA  
① ① ① 13

①

Tub. Urtica  
① ① ① 10

① → ① ① ① ①

Tub. ① ① ① ①

Tub. SERRA...  
① ① ① 5/80

SIA

① → ① ① ① ①

Tub. SOMNO  
① ① ① ①

①

① ① ① ① ①

①

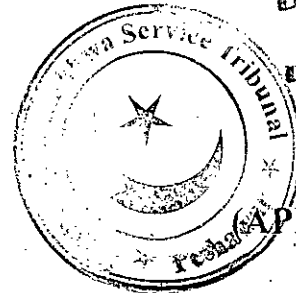


J (29) P

**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR**

APPEAL NO. 222 /2018

Jamal Ahmad, (PMS BS-17),  
Section officer, Home & TA'S Department.  
KPK, Peshawar.



Director Peshawar Service Tribunal

Diary No. 230

Date: 16-2-2018

(APPELLANT)

VERSUS

1. The Provincial Govt: though Chief Secretary KPK, Peshawar.
2. The Chief Secretary KPK, Civil Secretariat, Peshawar.
3. The Secretary to Govt: Establishment Deptt., KPK, Peshawar.
4. Ms. Humaira Mehmood (PMS BS-17), Section officer Finance Deptt.

(RESPONDENTS)

-----

APPEAL UNDER SECTION 4 OF THE SERVICE TRIBUNALS ACT, 1974 AGAINST THE ORDER DATED 26.01.2018 WHEREBY THE APPELLANT WAS TRANSFERRED PREMATURELY AND UTTER VIOLATION OF POSTING TRANSFER POLICY, AND AGAINST REJECTION ORDER DATED 13.2.2018 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT WAS REJECTED FOR NO GOOD GROUNDS.

PRAYER:

THAT THE ACCEPTANCE OF THIS APPEAL, THE IMPUGNED ORDER DATED 26.1.2018 and 13.02.2018, MAY BE SET ASIDE TO THE EXTENT OF THE APPELLANT BEING, PASSED PREMATURELY AND VIOLATION OF POSTING/TRANSFER & SPOUSE POLICY. THE RESPONDENT DEPTT: MAY FURTHER PLEASE BE DIRECTED NOT TO TRANSFER THE APPELLANT PREMATURELY AND IN VIOLATION OF POSTING/TRANSFER & SPOUSE POLICY. ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.

Filed to-day

Registrar

16/2/18

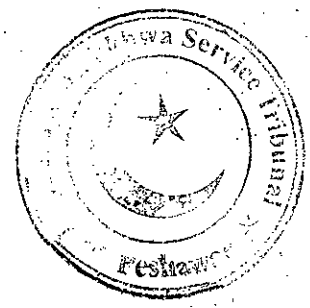
ATTESTED

EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Appeal No. 222/2018

Date of Institution ... 16.02.2018  
Date of Decision ... 03.04.2018



Jamal Ahmad, (PMS BS-17).  
Section officer, Home & TA'S Department,  
Khyber Pakhtunkhwa, Peshawar. ... (Appellant)

VERSUS

1. The Provincial Govt: though Chief Secretary Khyber Pakhtunkhwa,  
Peshawar and 3 others. ... (Respondents)

SYED NOMAN ALI BUKHARI,  
Advocate --- For appellant.

MR. MUHAMAMD RIAZ PAINDAKHEL,  
Assistant Advocate General --- For respondents.

MR. AHMAD HASSAN, --- MEMBER(Executive)  
MR. MUHAMMAD HAMID MUGHAL --- MEMBER(Judicial)

JUDGMENT

AHMAD HASSAN, MEMBER.- Arguments of the learned counsel for the parties heard and record perused.

FACTS

2. The appellant was promoted as Section Officer (PMS BPS-17) vide order dated 27.05.2016 and subsequently posted as Section Officer in Home & TA's Department on 07.06.2016. Vide impugned order dated 26.01.2018 he was transferred/posted as Addl. Assistant Commissioner (Rev), Manshra. He preferred departmental appeal on 01.02.2018, which was rejected on 13.02.2018, hence, the instant service appeal.

**ATTESTED**  
  
CHAIRMAN  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

### ARGUMENTS

3. Learned counsel for the appellant argued he was promoted as Section Officer (PMS BPS-17) vide notification dated 27.05.2016 and subsequently posted as Section Officer in Home & TA's Department on 07.06.2016. He was prematurely transferred as AAC (Rev) Mansehra. The appellant has not completed normal tenure as S.O Home Department. Wife of the appellant is also serving as Associate Professor (BPS-19) in Higher Education Department at Charsadda. They have two daughters and no other male member is available to look after the family. The case of the appellant is also covered under the transfer of Husband/Wife instructions notified by the Provincial Government on 07.08.2012. Action taken by the respondents also goes against their own instructions circulated on 27.02.2013. No speaking order was passed on the departmental appeal of the appellant, hence, Section-24-A of the General Clauses Act was also violated.

4. On the other hand learned Assistant Advocate General argued that all codal formalities were fulfilled before notifying the transfer of the appellant. Under Section-10 of the Civil Servant Act 1973 every civil servant is required to serve anywhere in the province.

### CONCLUSION

5. It is pertinent to mention here that clause-1 of the Posting/Transfer Policy elucidates that all the postings/transfers shall be strictly in public interest and shall not be abused/misused to victimize the Government Servants. Clause-IV of the said policy has laid down specified tenure against various posts. Neither this transfer was

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EXAMINER  
Rhytor Pakhankhwa  
Service Tribunal,  
Peshawar

made in public interest nor guidelines for normal tenure were observed. The respondents violated their own instructions circulated vide letter dated 27.02.2013. We are of the view that appellant's case is further fortified by the instructions regarding posting of serving husband/wife circulated by the respondents on 07.08.2012. As his wife is serving as Associate Professor in Higher Education at Charsadda, hence, his case squarely falls in the ambit of aforementioned instructions. They have two grown up daughters and no other male member is available at Peshawar to look after the family. It is otherwise a strong ground for considering his case even <sup>on to</sup> humanitarian grounds. On this score alone the appellant should not have been transferred to Mansehra. Respondents failed to pass speaking order on the departmental appeal, as such it is hit by Section-24(A) of General Clauses Act, 1897. As a sequel to above, the impugned transfer order is illegal, unlawful and not sustainable in the eyes of law.

6. As a sequel to above, the appeal is accepted. The impugned transfer order is set aside. Parties are left to bear their own costs. File be consigned to the record room.

*Announced*  
03.04.2018

*Sd/- Ahmad Hissau,*  
*Member*

*Sd/- M. Haid Nughal,*  
*Member*

Certified to be true copy  
Khy. Service Tribunal,  
Peshawar



**GOVERNMENT OF KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT**

**(REGULATION WING)**

No. SOR-VI/E&AD/1-4/2010/Vol-VIII  
Dated Peshawar, the, 07<sup>th</sup> August, 2012

To

3. The Additional Chief Secretary, Planning & Development Department, Government of Khyber Pakhtunkhwa, Peshawar.
2. The Additional Chief Secretary (FATA), FATA Secretariat, Peshawar.
3. The Senior Member, Board of Revenue, Khyber Pakhtunkhwa.
4. All the Administrative Secretaries to Government of Khyber Pakhtunkhwa.
5. All the Divisional Commissioners in Khyber Pakhtunkhwa.
6. All Heads of the Attached Departments in Khyber Pakhtunkhwa.
7. All the District Coordination Officers in Khyber Pakhtunkhwa and Political Agents in FATA.

Subject: POSTING OF SERVING HUSBAND/WIFE AT THE SAME STATION OF THE PROVINCIAL GOVERNMENT.

Dear Sir

I am directed to refer to the subject noted above and to state that keeping in view the Socio economic Problems and hardships faced by husbands and wives in Government Service due to posting at different station of duty, the competent authority has been pleased to prescribe the following guideline to facilitate posting of husband and wife at the same station:-

- i) Where a request is made for posting at a different station in the same department/service/cadre in which an employee is already serving, the request may be accepted subject to availability of a post in the same BPS.
- ii) If request involves temporary deputation to another department, it may be processed in consultation with the concerned department and may be accepted on the prescribed terms of deputation subject to availability of a post in the same BPS.
- iii) If there is a tie between two or more Government servants for posting at the same station in the same department/unit of an

**ATTENDED**

organization, the Government servant with greater length of service may be preferred.

iv) Request for posting by a spouse facing serious medical problems may be accorded highest priority.

v) Spouses already posted at one station, including those posted on deputation may normally not be disturbed without compelling reasons of public interest. Requests for extension of deputation period beyond the permissible limit may be considered with compassion if interests of public service would permit.

2. Kindly acknowledge receipt.

Yours faithfully,

*Naaj*  
7/8/12  
(NAJ-MUS-SAHAR)  
SECTION OFFICER (REG:VI)

Ends in & date even.

Copy forwarded to:

1. The Secretary to Governor, Khyber Pakhtunkhwa.
2. The Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
3. The Registrar, Peshawar High Court, Peshawar.
4. The Registrar, Khyber Pakhtunkhwa Service Tribunal, Peshawar.
5. The Director General, Provincial Disaster Management Authority.
6. All Additional Secretaries, Deputy Secretaries and Section Officers in Establishment & Administration Department.
7. Private Secretaries to all Provincial Ministers in Khyber Pakhtunkhwa.
8. PSO to Chief Secretary Khyber Pakhtunkhwa, Peshawar.
9. Private Secretary to Secretary Establishment Department.
10. Private Secretary to Secretary Administration Department.
11. The Incharge Resource Centre, Estt.&Admn: Department.

*Naaj*  
7/8/12  
SECTION OFFICER (REG: VI)

**ATTENDED**



GOVERNMENT OF NWFP  
ESTABLISHMENT & ADMINISTRATION  
DEPARTMENT  
(Regulation Wing)

POSTING / TRANSFER POLICY OF THE PROVINCIAL GOVERNMENT.

- i) All the posting/transfers shall be strictly in public interest and shall not be abused/misused to victimize the Government servants
- ii) All Government servants are prohibited to exert political, Administrative or any other pressures upon the posting/transfer authorities for seeking posting/transfers of their choice and against the public interest.
- iii) All contract Government employees appointed against specific posts, can not be posted against any other post.
- iv) The normal tenure of posting shall be three years subject to the condition that for the officers/officials posted in unattractive areas the tenure shall be two years and for the hard areas the tenure shall be one year. The unattractive and hard areas will be notified by the Government.
- v) While making postings/transfer from settled areas to FATA and vice-versa, specific approval of Governor NWFP needs to be obtained
- vi) While making postings/transfers of officers/officials up to BS-17, from settled areas to FATA and vice-versa approval of the Chief Secretary NWFP needs to be obtained. Whereas, in case of posting/transfer of officers in BS-18 and above, from settled areas to FATA and vice versa, specific approval of the Governor NWFP shall be obtained.
- vi (a) All Officers/officials selected against Zone-I/FATA quota in the Provincial Services should compulsorily serve in FATA for atleast eighteen months in each grade. This should start from senior most scales/grades downwards in each scale/grade of each cadre.
- vii) Officers may be posted on executive/administrative posts in the Districts of their domicile except District Coordination Officers (D.C.Os) and DPOs/Superintendent of Police (SP). Similarly Deputy Superintendent of Police (DSP) shall not be posted at a place where the Police Station (Thaana) of his area/residence is situated.

Para-1(v) regarding months of March and July for posting/transfer and authorities for relaxation of ban deleted vide letter No: SOR-VI (E&AD) 1-4/2008/Vol-VI, dated 3-6-2008. Consequently authorities competent under the NWFP Government Rules of Business, 1985, District Government Rules of Business 2001, Posting/Transfer Policy and other rules for the time being in force, allowed to make posting/transfer subject to observance of the policy and rules. Added vide Urdu circular letter No. SOR-VI(E&AD)1-4/2003, dated 21-09-2004

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ATTESTED

ATTESTED

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- viii) No posting/transfers of the officer's/officials on detailment basis shall be made.
- ix) Regarding the posting of husband/wife, both in Provincial services, efforts where possible would be made to post such persons at one station subject to the public interest.
- x) All the posting/transferring authorities may facilitate the posting/transfer of the unmarried female government Servants at the station of the residence of their parents.
- (xi) Officers/officials except DCOs and DPOs/SPs who are due to retire within one year may be posted on their option on posts in the Districts of their domicile and be allowed to serve there till the retirement  
**DCOs and DPOs who are due to retire in the near future may also be posted in the District of their domicile subject to the condition that such posting would be against non-administrative posts of equivalent scales:**
- xii) In terms of Rule-17(1) and (2) read with Schedule-III of the NWFP Government Rules of Business 1985, transfer of officers shown in column 1 of the following table shall be made by the authorities shown against each officer in column 2 thereof:

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

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

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(36) (20)

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

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

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

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

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

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

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

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

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

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

All concerned are requested to ensure that tenures of the concerned officers/officials are invariably mentioned in summaries submitted to the Competent Authorities for Posting/Transfer.

{Authority: Letter No: SOR-VI/E&AD/1-1/2003 dated 24-6-2003}.

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

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

SPECIMEN NOTIFICATION.

GOVERNMENT OF NWFP  
NAME OF ADMINISTRATIVE  
DEPARTMENT

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

NOTIFICATION

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

CHIEF SECRETARY  
GOVERNMENT OF NWFP

Endst. No. and date even.

Copy forwarded

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5.

(NAME)  
SECTION OFFICER  
Administrative Department

{Authority: Letter No. SO (E-I) E&AD/9-12/2006 dated 22-12-2006}.

The competent authority has been pleased to direct that Para 1(v) of the Posting/Transfer Policy contained in this Department letter No:SOR-I (E&AD) 1-1/85 Vol-II, dated 15-2-2003 shall stand deleted, with immediate effect, consequently allowing the authorities, competent under the NWFP Government Rules of Business, 1985 and the District Government Rules of Business, 2001 or any other rules for the time being in force, to make posting/transfers of Government servants, any time during the year, in genuinely deserving and necessary cases, in public interest, subject to strict observance of all other provisions of posting/transfer policy contained and notified vide circular letter under reference. Hence there will be no ban on posting/transfer of Government Servants in any part of the year while carrying out postings/transfers of Government Servants.

The authorities concerned will ensure that no injustice whatsoever is caused to any civil servant, public work is not suffered and service delivery is improved.

I am therefore directed to request that the provisions of posting/transfer policy, as amended to the extent above, may kindly be followed in letter and spirit in future so as to keep good governance standard in this regard.

{Authority: Letter No: SOR-VI (E&AD) 1-1/2008/Vol-VI, dated 3-6-2008}.

.....  
According to the policy of the provincial Government, maximum tenure on a post is three years. Contrary to the Policy, Store Keepers, Cashiers, Accountants and other ministerial staff remains posted in their particular field for long time, which may result in misuse of this position, due to which not only public exchequer may sustain loss but general public also suffers. The Provincial Government has taken serious notice of this situation & decided that all Administrative Secretaries and DCOs may submit a certificate within one month to the effect that above mentioned officials, having completed three years on their posts, have been adjusted on posts other than those they held previously.  
{Authority: Urdu circular No: SOR-VI (E&AD)/05 dated 28<sup>th</sup> Oct, 2005.}

.....  
The Chief Minister NWFP has directed that:-

- i) Submission of summary would not be required in case of mutual transfer.
- ii) Posting/transfer shall be made according to the policy;
- iii) Government Servants shall avoid direct submission of applications to the Chief Minister;
- iv) In genuinely deserving case, they should approach the Administrative Secretaries who could process the case according to policy;

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- v) In case of direct submission of application to the Chief Minister Secretariat for Posting/ Transfer, the concerned govt servants shall be proceeded against under the prevalent rules and regulations.

{Authority: Urdu circular No: SOR-VI/E&AD/1-4/2003, dated 8-6-2004.  
Urdu Letter No: SOR-VI/E&AD/Misc: /2005, dated 3-1-2005.}

It has been decided with the approval of the competent authority that:-

- i) Mutual transfer would be allowed if both the concerned employees agree; except the Government Servants holding Administrative posts;
- ii) NWFP Government Rules of Business 1985 shall be observed while issuing posting/transfer orders.

{Authority: - Urdu circular letter No: SOR (E&AD)/1-4/2005, dated 9-9-2005}

.....

The competent authority has decided that in order to maintain discipline, enhance performance of the departments and ensure optimum service delivery to the masses, the approved /prevalent policy of the posting/transfer shall be strictly followed. Government Servants violating the policy and the NWFP Govt Servants (Conduct) Rules 1987 shall be proceeded against under the NWFP Removal from Service (Special Powers) Ordinance 2000. As required under the NWFP Govt Rules of Business 1985, the Administrative Secretaries shall ensure compliance with the policy and defaulting offices/officials be taken to task & entries to this effect shall be made in their PERs/ACRs. In case subordinate officers are working on sites or proceeding for the purpose of inspection, they shall submit inspection Report to their Administrative Secretaries. Administrative Secretaries shall ensure submission of such reports.

{Authority: - Urdu circular No: SOR-VI (E&AD)/1-4/06, dated, 29-6-2007}.

.....

### PLACEMENT POLICY.

In order to utilize the expertise of the officers who have received foreign training in various fields, the provincial Government has decided to adopt the Placement Policy, approved by the Prime Minister of Pakistan, and make it a part of its Posting/Transfer Policy. Placement Policy as follows:-

- i) All placements would be made on the basis of merit and keeping in view the needs of the organization.
- ii) The first priority in placement must go to the parent organization of the participant from where the individual had applied. This will be in consonance with the concept of establishing the "Need" for the department and fulfilling the need through "capacity building for the organization.
- iii) In order to follow the "bottom up approach" for Devolution, the priority within departments must go to the Districts, the Provinces and then the Federal Government.
- iv) The second priority in placement should go to up-grading the existing training Institution within the country. The knowledge gained by the

<sup>1</sup> Placement Policy has been made part of the posting/transfer policy vide Urdu circular No.SOR-VI(E&AD)1-4/06, dt 9-2-2007

**ATTESTED**

nwfp.gov.pk

**ATTESTED**

mushkalawati

**ATTESTED**

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Posting - Transfer Policy - updated till 10 Jan, 2009

officers. will be of immense value to bring about a qualitative change in the training institutions. The following proposals are made in this regard:

- a) Permanent posting of an officer to the training institutions for 2-3 years;
- b) Temporary attachment with the training intuitions for 3 to 6 months for some research project on helping in developing case studies;
- c) Earmarked as a visiting faculty member for specific subject.
- v) Individuals posted to their parent organizations will also organize training for their subordinates within the department, in order to transfer the knowledge and bring about a qualitative change internally;
- vi) The Normal tenure of posting as already provided in the policy would be ensured;
- vii) No participant should be allowed to be posted on deputation to multinational donor agencies for at least 5 years;
- viii) No participant will decline/represent against his/her posting.

\*\*\*\*\*

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GOVERNMENT OF KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT

(REGULATION WING)

NO. SOR.VI (E&AD)1 -4/2005/Vol-II

Dated Peshawar, 27<sup>th</sup> February, 2013

Environment Department  
Govt. of Khyber Pakhtunkhwa  
S.O. No. 1229  
Dated 28-2-2013

To  
*[Handwritten signature]*

1. The Additional Chief Secretary (P&D) Khyber Pakhtunkhwa.
2. The Additional Chief Secretary (FATA) Khyber Pakhtunkhwa.
3. All Administrative Secretaries to Govt. of Khyber Pakhtunkhwa.
4. All Commissioners in Khyber Pakhtunkhwa.

Subject: CONSTITUTION PETITION NO.23 OF 2012 OUT OF SUO MOTO CASE NO. 3/2012 (PETITION BY MS. ANITA TURAB FOR PROTECTION OF CIVIL SERVANTS REGISTERED UNDER ARTICLE 184 (3) OF THE CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN 1973.)

Sir,

I am directed to refer to the subject noted above and to state that the Supreme Court of Pakistan vide the subject cited judgment has enunciated the following principles of Law with regard to protection and conduct of civil servants.

- (i) **Appointments, Removals and Promotions:** Appointments, removals and promotions must be made in accordance with the law and the rules made thereunder, where no such law or rule exists and the matter has been left to discretion, such discretion must be exercised in a structured, transparent and reasonable manner and in the public interest.
- (ii) **Tenure, Posting and Transfer:** When the ordinary tenure for a posting has been specified in the law or rules made thereunder, such tenure must be respected and cannot be varied, except for compelling reasons, which should be recorded in writing and are judicially reviewable.

*[Handwritten notes: DSA, SO, 4/3, majid]*

*[Handwritten signatures and initials: Sptl. Secy, Az, 4/3]*

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Sd/- Lt. Secy Est

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(iii) **Illegal Orders:** Civil Servants owe their first and foremost allegiance to the law and the constitution. They are not bound to obey orders from superiors which are illegal or are not in accordance with accepted practices and rule based norms; instead, in such situations, they must record their opinion and, if necessary, dissent.

(iv) **OSD:** Officers should not be posted as OSD except for compelling reasons, which must be recorded in writing. If at all an officer is to be posted as OSD, such posting should not exceed 03 months. If there is a disciplinary inquiry going on against him/her such inquiry must be completed at the earliest. The officer on special duty may be posted against a post of his/her equivalent pay scale/grade within 03 months of his/her order as OSD.

2. I am, therefore, directed to request you to note the above principles of law for strict compliance.

Yours faithfully,

*najam*

(NAJ-MUS-SAHAR)  
SECTION OFFICER (REG-VI)

Encl: as above.

A copy is forwarded to:-

1. The Principal Secretary to Governor, Khyber Pakhtunkhwa.
2. The Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
3. The Secretary Provincial Assembly, Khyber Pakhtunkhwa.
4. The Accountant General, Khyber Pakhtunkhwa.
5. The Registrar, Peshawar High Court, Peshwar.
6. The Secretary Khyber Pakhtunkhwa, Public Service Commission.
7. All Addl: Secretaries Establishment & Administration Department.
8. All Deputy Secretaries in Establishment & Administration Department.

*najam*

SECTION OFFICER (REG-VI)

ATTESTED

ATTESTED

2 منجانب  
بنام Gul Faraz

vs

Education Deptt.

مورخہ

مقدمہ

دعویٰ

جرم

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ

آن مقام پندرہ کیلئے محمد آصف (ڈسٹنری) اور مسو نومان علی کی طرف سے مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق و زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

Syed Noman Ali Bukhari  
Advocate  
Attested  
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المرقوم

کے لئے منظور ہے۔  
Gul Faraz  
Attested  
مقام



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## BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 511/2019

Mr. Gul Faraz.....Appellant

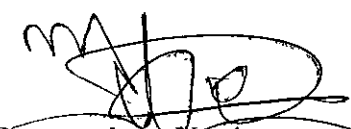
Versus

The Secretary, E&amp;SE and others.....Respondents

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1.	Memo of Reply with Counter Affidavit			1-4
2.	Reply to stay application			5
3.	Seniority list circulated vide letter	17.08.2019	Reply/1	6-16
4.	Office Memorandum	13.05.1998	Reply/2	17-18
5.	W.P & order of PHC	26.11.2018	Reply/3	19-24
6.	NADRA Form -B		Reply/4	25

Through

  
 Respondent No.4.  
 Muhammad Farooq

  
 Khaled Rahman,  
 &  
 Muhammad Amin

Advocates, Peshawar.

Dated: 10/05/2019

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 511/2019

Mr. Gul Faraz.....Appellant

Versus

The Secretary, E&SE and others.....Respondents

---

REPLY ON BEHALF OF RESPONDENT NO.4 (MR. MUHAMMAD FARROQ)

---

Respectfully Sheweth,

**Preliminary Objections:**

- I. That the appellant has got no cause of action and locus standi to file the appeal in hand.
- II. That the appellant is estopped by his own conduct to file the instant appeal.
- III. The appeal in hand is time barred.
- IV. The appellant has filed his departmental appeal to a wrong forum and decision by the said wrong forum does not entitle the appellant to file the service appeal before the Hon'ble tribunal.
- V. The appellant has not approached the Hon'ble Tribunal with clean hands. As a matter of facts he has concealed material facts from the Hon'ble tribunal rendering the appeal in hand not maintainable.
- VII. Every Civil Servant is liable to be transferred anywhere within the Province as per the mandate of Section 10 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 and the policies being subservient to the parent statute cannot override the same.

Reply to Facts:

1. Correct to the extent that appellant alongwith Respondent No.4 and 58 other ADEOs (BS-16) were promoted to the posts of SDEOs (BS-17) vide order dated 29.10.2018 and consequently appellant was adjusted at Bahrain Swat while Respondent No.4 at District Karak on the basis of his seniority and merit. As per the Seniority List circulated vide letter dated 17.08.2018 (**Annex:-Reply/1**), appellant dwells at Serial No. 31 while Respondent No. 4 at Serial No.3.
  
2. Not admitted as correct. After the general transfer order *ibid*, appellant fetched a heavy political pressure to bear upon the official Respondents and thus succeeded in procuring the transfer order dated 13.11.2018 whereby the transfer order of Respondent No.4 was prematurely cancelled just after 14 days in an illegal manner. As for as the spouse policy is concerned, the same has been subjected to a self-serving and twisted interpretation; *firstly*, the request of the spouse for transfer to the station of other spouse is subject to the availability of vacant post whereas in the case in hand there was no such vacant post and illegally and prematurely Respondent No.4 was disturbed in utter violation of law and policy. *Secondly*, as per the detail policy vide Office Memorandum dated 13.05.1998 (**Annex:-Reply/2**) the subject guidelines are subject to the following conditions;-
  - (i) *Posting of husband and wife at the same station should not made by dislocation of any Government Servant already serving at a particular station unless his transfer is necessitated by compelling reasons of public interest or within the framework of general policy of transfer and posting;*
  
  - (ii) *The prescribed Selection Authority be consulted in each case.*
  
- 3 Not admitted as correct. As a matter of fact, against the illegal and premature transfer of Respondent No.4, he filed W.P. No.1020/2018 before the Peshawar High Court which was later on converted into departmental appeal and sent to the appellate authority for decision in accordance with law and in pursuance of the same the plea of the Respondent No.4 was accepted and accordingly he was retransferred according to his own entitlement as per the law and merit keeping in

view his senior position. (Writ Petition and order of the High Court (**Annex:-Reply/3**)).

4. Regarding Para No.4 it is submitted that no appeal can be made against an appellate order as there is no appeal over appeal hence the departmental appeal as well as the Service appeal in hand are incompetent.

**Reply to Grounds:**

- A. Incorrect. The impugned order dated 07.02.2019 is in accordance with law to which no exception can be drawn. The transfer order of Respondent No. 4 was premature hence rightly recalled in the interest of justice.
- B. Incorrect. It is not acceptable because the transfer order earlier passed was illegal and politically motivated one hence could not be sustained.
- C. Misconceived hence denied. Rather the transfer order of Respondent No.4 was passed just after 14 days which was quite premature. Moreover, the kids of the Respondent No.4 are more minor as compared to the kids of appellant as is evident from Form-B (**Annex:-Reply/4**) Issued by the NADRA Office.
- D. Incorrect. If the spouse of appellant is having any medical complication she may conveniently apply for medical leave but the fact is that she is all-well and regularly goes to school without any trouble.
- E. Misconceived. The cited judgment has been passed in the light of its own facts and circumstances which cannot be applied to the case in hand keeping in view its own peculiar facts and background.
- F. Not admitted, the matter has been explained in *extenso* *ibid*.
- G. Not admitted. The order has been passed as per the merit and in accordance with the settled law.
- H. Incorrect hence denied.
- I. Not admitted as correct. The Judgment of the Supreme Court of Pakistan in **ANITA TURAB** case is in favour of the Respondent No.4 who relies upon the

same as well the referred circular.

J. Incorrect. the very departmental appeal was not maintainable.

It is, therefore, humbly prayed that on acceptance of this reply, the appeal of appellants may graciously be dismissed with costs.

Through

Respondent No. 4.  
Muhammad Farooq

Khaled Rahman,  
&  
Muhammad Amin

Advocates, Peshawar.

Dated: 10/05/2019

Counter Affidavit

I, Khaled Rahman, Advocate, as per instruction of my client, do hereby affirm and declare on oath that the contents of this reply are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

Deponent



10 APR 2019

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

**Service Appeal No. 511 /2019**

Mr. Gul Faraz.....Appellant

Versus

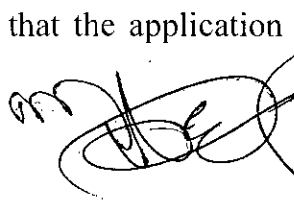
The Secretary, E&SE and others.....Respondents

**Reply on behalf of Respondent No.4 in response to stay application**

**Respectfully sheweth**

1. Needs no reply.
2. Incorrect. Appellant has got no case on merit let alone prima facie case.
3. Needs no reply.
4. Incorrect, the order impugned is according to law and hence unexceptionable.
5. Not admitted. The tenure of Respondent No.4 was incomplete rather when he was illegally transferred.
6. Incorrect. the appellant failed to fulfill the conditions for grant of stay.

It is therefore, humbly prayed that the application may kindly be rejected being devoid of merits.

  
(Respondent No 4.)  
Muhammad Farooq

Through

Khaled Rahman,  
&  
Muhammad Amin

Advocates, Peshawar.

Dated: 10/05/2019

C 12

**Directorate of Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar**

PH No. 091-9225338, 9225339,  
Fax 091-9225339



**NOTIFICATION.**

Repdy/ 6

In exercise of powers conferred under Sub Section (1) of Section-8 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No.XVIII of 1973), the Final Seniority List of ASDEOs/ADEOs Male (Management Cadre), BPS-16 of Elementary & Secondary Education Department is hereby notified for information of all concerned.

Director  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

Endst: No. 3459-90

File No. 1/ADEO (M) Management Cadre Seniority List/2018

Dated Peshawar the 17/8 /2018.

Copy forwarded to the: -

1. Director Curriculum & Teacher Education Khyber Pakhtunkhwa, Abbottabad.
2. Director Education FATA Khyber Pakhtunkhwa, Peshawar
3. Director PITE Khyber Pakhtunkhwa, Peshawar
4. All District Education Officers (M) in Khyber Pakhtunkhwa
5. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
6. P/A to Director E&SE Department Khyber Pakhtunkhwa.
7. The Deputy Director( EMISE), E&SE Department, with the request to upload the requisite Seniority List of E&SE Department website ([www.kpese.gov.pk](http://www.kpese.gov.pk)).
8. Master File

Dy: Director (Estab)  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

16/8/18

R/1



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA, PESHAWAR.  
FINAL SENIORITY LIST OF ADEOs ASDEOs (BPS-16) REGULAR MANAGEMENT CADRE MALE IN ELEMENTARY  
& SECONDARY EDUCATION KHYBER PAKHTUNKHWA, CORRECTED UPTO 15-08-2018

S.#	Name & Designation	Father's name	Qualification	Place of posting	Year of passing B. Ed	Date of birth	Domicile	Date of 1st Apptt. in Education Department	Date of Apptt. on ADEO post	Remarks
1	Ghulam Habib	Muhammad Wali	M.Sc B.Ed.M.Phil	DEO Shangla	1997	6.5.1967	M.Agency	12.7.1989	5.20.2011	
2	Mehboob Ellahi	Rahmat Elahi	M.A M.Ed	DEO Chitral	1999	3.15.1970	Chitral	4.10.1995	05.05.2011	
3	Muhammad Farooq	Gul Rehman		DEO Karak		2.3.1976	Karak	05.05.2011	05.05.2011	
4	Abdul Qayum Khan	Haji Lal Khan	M.Sc M.Ed	DEO Abbottabad	1998	4.8.1970	A.Abad	11.1.1995	05.05.2011	
5	Muhammad Zahid Khan	Sher Zaman	M.Sc M.Ed	DEO Nowshera	1998	11.22.1973	Nowshera	6.23.1997	05.05.2011	
6	Shamsul Islam Niaz	Niaz Muhammad	M.A B.Ed	DEO Charsadda	2000	1.1.1978	Charsadda	01.11.2010	05.05.2011	
7	Sharafat Khan	Muhamad Aslam Khan	M.A M.Ed	DEO Abbottabad	1997	5.10.1970	A.Abad	05.05.2011	05.05.2011	
8	Mahmood Iqbal	Khairati Khan	MBA M.Ed	DEO(M) D.I Khan	2000	12.1.1967	DI Khan	1.17.1998	05.05.2011	
9	Muhammad Irshad	Niaz Farid	M.A B.Ed	DEO Bannu	1999	4.16.1976	FR.Bannu	1.31.2002	05.05.2011	
10	Muhammad Anwar	Hazrat Umar	M.A M.Ed	DEO Mardan	2002	3.1.1973	Mardan	6.24.1997	05.05.2011	
11	Zia ullah	Zikriya Khan	M.Sc M.Ed	DEO Peshawar	1994	3.19.1970	Peshawar	5.28.1994	05.05.2011	
12	Shams Ur Rehman	Malik ur Rehman	M.A.Edu	DEO Manshra	1999	11.15.1974	Manshra	1.20.1996	05.05.2011	
13	Iftekhar Ahmad	Mumtaz ahmad	M.A M.Ed	DEO Haripur	1999	12.25.1969	A.Abad	5.8.1993	05.05.2011	
14	Ghulam Sarwar	Ghulam yahya	M.A M.Phil	DEO MKD	1996	5.21.1972	MKD	2.11.1993	05.05.2011	
15	Muhammad Zubair	Sabz Ali Shah	M.A B.Ed	DEO Charadda	2001	7.19.1972	Charsada	1.22.1998	05.05.2011	
16	Fazli Khuda	Waris Khan	M.A M.Ed	DEO Mardan	2002	1.6.1976	Mardan	3.24.2003	05.05.2011	
17	Muhammad Rehman Shah	Gul Rehman Shah	M.A M.Ed	DEO Bannu	2002	2.23.1976	Bannu	05.05.2011	05.05.2011	
18	Muhammad Sohail Khan	Mir Jafar Khan	M.A M.Ed	DEO Nowshera		3.22.1971	Nowshera	10.31.1996	05.05.2011	
19	Muhammad Naseem	Husnul Maab	M.A M.Ed	DEO Swat	2001	4.10.1975	Swat	05.05.2011	05.05.2011	
20	Ali Haider	Bahdar Khan	M.Sc M.Ed	DEO Dir(L)	1991	1.5.1962	Dir	11.19.1986	05.05.2011	
21	Muhammad Raza Shah	Muhammad Hanif	M.A M.Ed	DEO Dir (L)	1991	12.18.1963	Dir	5.11.1983	05.05.2011	

D  
A  
A

New  
16/8/18

S.#	Name & Designation	Father's name	Qualification	Place of posting	Year of passing B. Ed	Date of birth	Domicile	Date of Ist. Apptt. in Education Department	Date of Apptt. on ADEO post	Remarks
22	Muhammed Islam	Fatihul Mulik Khan	M.A M.Ed	DEO Dir(L)	2003	4.10.1973	Dir	12.20.1994	05.05.2011	
23	Dil Nawaz Khan	Dashat Mir	M.Sc M.Ed	DEO Karak	2003	1.3.1977	Karak	8.1.2006	05.05.2011	
24	Fida Muhammad	Firdos Khan	M.A M.Ed	P.O E&SE	2001	4.15.1977	Swabi	4.20.1999	05.05.2011	
25	Muhammad Aftab	Masal Khan	M.S (Edu)	DEO Nowshera	2004	4.14.1978	Nowshera	6.23.1997	05.05.2011	
26	Hayat Khan	Nazeef Khan	M.Sc.M.Ed	DEO Peshawar	2004	2.15.1979	Charsada	5.17.2011	5.23.2011	
27	Muhammad Ajmal	Jamalud Din	M.A M.A Edu	DEO Mansehra	1999	1.2.1969	Mansehra	2.28.1993	05.05.2011	
28	Salih Muhammad	Shad Muhammad	M.A M.Ed	DEO Nowshera	1995	1.1.1967	Swabi	12.9.1989	05.05.2011	
29	Waheed Ullah Shah	Mazhar Ali Shah	M.A B.Ed	DEO Bannu	1994	1.16.1968	Bannu	3.31.1992	05.05.2011	
30	Khalid Naseem	Malik Muhammad Amir	M.Sc B.Ed	DEO DI Khan	2002	2.28.1976	DI Khan	4.21.1999	05.05.2011	
31	Gul Faraz	Shahid Khan	M.A M.Ed	DEO Karak	1999	3.5.1970	Karak	10.8.1990	05.05.2011	
32	Abudur Fehman Rashid	Inayat Ullah Jan	M.Sc M.Ed	DEO Laki Marwat	1993	1.11.1971	L.Marwat	8.3.1999	05.05.2011	
33	Abdul Wahab	Abdul Ghafoor	MA.M.Ed	DEO Swabi	1998	3.6.1971	Swabi	12.31.1993	05.05.2011	
34	Imtiaz Khan	Taj Barin	M.Phil B.Ed	DEO Nowshera	1996	2.8.1973	Nowshera	5.30.1995	05.05.2011	
35	Hameed Ullah	Khan Zaman	M.A B.Ed	DEO L.Marwat	2003	4.12.1974	L.Marwat	9.1.2004	05.05.2011	
36	Muhammad Abid	Fazli Khaliq	M.A M.Ed	DEO Swabi	2002	11.1.1974	Swabi	4.24.1998	05.05.2011	
37	Muhammad Azam	Badashah Islam	M.Sc M.Ed	DEO Swat	2001	12.27.1974	MKD	05.05.2011	5.10.2011	
38	Raees Kahn	Johar Gul	M.A M.Ed	DEO Khoistan	2000	9.6.1976	Khy: Agency:	9.21.1998	5.23.2011	
39	Adil Muhammad	Ghani Muhammad	M.Sc M.Ed	DEO Mardan	2004	4.3.1979	Swabi	5.7.2011	05.05.2011	
40	Shah Jehan Khan	H.Aslam Khan	M.Sc M.Ed	Assistant Director	2004	4.15.1979	Peshawar	05.05.2011	05.05.2011	
41	Love Dan	Amin Jan	M.A B.Ed	DEO Dir(U)	1997	4.2.1972	Baj Agg:	4.19.1995	5.10.2011	
42	Amir Badashah	Tamash Gul		DEO Mardan		4.15.1973	Mardan	05.05.2011	05.05.2011	
43	Muhammad Hamayun	Salam Gul	M.A M.Ed	DEO Karak	2003	2.2.1973	Karak	10.12.1995	05.05.2011	
44	Niaz Wali Khan	Muhammad Yousaf	M.A M.Ed	DEO Swabi	1997	3.5.1971	Swabi	9.21.1997	05.05.2011	
45	Muhammad Saleem	Abdul Halim	MA M.Ed	DEO Nowshera	2001	4.25.1972	Nowshera	12.7.1992	05.05.2011	

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S.#	Name & Designation	Father's name	Qualification	Place of posting	Year of passing B. Ed	Date of birth	Domicile	Date of Ist. Apptt. in Education Department	Date of Apptt. on AD/EO post	Remarks
46	Shafiq Ur Rehman	Abdur Rehman	M.A M.Phil (Edu)	DEO Manshra	1998	4.12.1973	Manshra	1.31.1995	05.05.2011	
47	Ahmad Ullah	Nasrullah	MA.M.Ed	DEO Charsadda	2000	8.17.1974	Charsada	7.13.1997	05.05.2011	
48	Races Ur Rehman	Noor Ur Rehman	M.A M.Ed	DEO Manshra	1993	2.13.1966	Manshra	3.15.1986	05.05.2011	
49	Muhammad Zarif	Nawaz Ali	M.Sc M.Ed	DEO DI Khan	1994	7.25.1969	DI Khan	5.26.1997	05.05.2011	
50	Muhammad Tariq	Noor Ali Khan	M.A M.Phil	DEO Bannu	1998	3.28.1971	Bannu	5.5.1999	05.05.2011	
51	Hamid Rasool	Abdur Rasool	M.A M.Ed		1997	6.2.1974	Bannu	9.1.2006	05.05.2011	
52	Qadir Shah	Sahib Khan	M.A M.Ed	DEO L.Marwat	2000	1.3.1974	L.Marwat	5.10.2005	5.10.2011	
53	Muhammad Arshad	Wadooq Ur Rehman	M.A B.Ed	DEO Charsadda	2000	22.01.1974	Peshawar	8.16.1997	5.10.2011	
54	Irshad Khan	Khushal khan	M.A M.Ed	PITE	2003	3.14.1974	Peshawar	5.15.1999	05.05.2011	
55	Syed Atta Ullah Shah	S.yed Muzarab shah	M.Sc M.Ed	Assistant Director	2001	2.1.1976	Mohd Ay:	05.05.2011	5.10.2011	
56	Shahzad Nadeem	Khurshheed Ahmad	M.A M.Ed	DEO Chitral	2002	2.1.1977	Chitral	05.05.2011	05.05.2011	
57	Habib Ur Rehman	Badashah Khan	M.A M.Ed	DEO L.Marwat	1993	9.5.1964	L.Marwat	12.16.1990	05.05.2011	
58	Abdul Samad	Muhammad Miskeen	M.A M.Ed	DEO Haripur	1998	1.1.1970	Manshra	12.19.1990	5.10.2011	
59	Chanzeb	Zardad Khan		DEO Abbottabad		5.25.1972	Abbott Abad	05.05.2011	05.05.2011	
60	Raja Babu Jahangir	Raja Sultan Mubarak	M.A B.Ed	DEO Manshra	1999	4.1.1973	Manshra	05.05.2011	05.05.2011	
61	Qaisar Khan	Muhammad Nawaz Khan	M.A M.Ed	DEO Karak	2000	4.16.1974	FE. Bannu	4.20.1999	5.10.2011	
62	Sharaf Uddin	Gul Nadar Khan	M.A B.Ed	DEO Chitral	1994	2.20.1968	Chitral	3.1.1991	05.05.2011	
63	Imtiaz khan	Gul Zaman khan	M.A M.Ed	DEO Dir(L)	1992	4.8.1968	Dir	5.16.1987	05.05.2011	
64	Muhammad Khitab	Gulab	M.A M.Ed	DEO Dir(L)	1994	1.1.1969	Dir	12.10.1990	05.05.2011	
65	Bakht Zuda	Mahan Gul	M.A M.Ed	DEO Dir(L)	1995	4.10.1970	Dir	4.25.1992	05.05.2011	
66	Zia ur Rehman	Said Rehman	M.A M.Ed	DEO Peshawar	1996	7.15.1972	Peshawar	1.1.1994	05.05.2011	
67	Ihtisham ul Haq	Fazal Haq	M.Phil(Edu)	DEO MKD	2000	1.1.1973	MKD	05.04.1999	05.05.2011	
68	Muhammad Saleem	Ghulam Sarwar	M.A M.Ed	DEO DI Khan	1993	4.18.1970	DI Khan	12.31.1997	05.05.2011	
69	Sikandar Irfan	Faiz Ullah Khan	M.Sc M.Ed	DEO DI Khan	1998	9.11.1972	DI Khan	1.13.1996	05.05.2011	

S.#	Name & Designation	Father's name	Qualification	Place of posting	Year of passing B. Ed	Date of birth	Domicile	Date of Ist: Apptt: in Education Department	Date of Apptt: on ADEO post	Remarks
70	Abdul Hafiz	Abdur Rashid	M.Sc M.Ed	DEO DI Khan	1996	3.8.1974	DI Khan	3.1.1993	05.05.2011	
71	Ishtiaq Ahmad Khan	Muhammad kram khan	M.A M.Ed	DEO Abbottabad	2002	5.14.1968	A.Abad	6.11.1987	05.05.2011	
72	Mati Ullah khan	Darwaiz khan	M.A M.Ed	DEO DI Khan	2001	4.3.1978	FR.Bannu	05.05.2011	5.12.2011	
73	Shahbir Ahmad	Fazle Hanan	M.A M.Ed	DEO Charsadda	2001	4.30.1973	Charsada	2.23.1998	05.05.2011	
74	Jamsheed Khan	Mehmood khan	M.A M.Ed	DEO Swabi	2002	1.1.1977	Swabi	1.11.2000	05.05.2011	
75	Riaz khan	Mir Zale khan	M.A M.Ed	DEO Bannu	2000	3.8.1972	Bannu	4.23.1996	5.24.2011	
76	Rajab Ali	Mir Qadam khan	M.A M.Ed	DEO Bannu	2000	4.15.1970	SW Agy:	10.31.1994	5.10.2011	
77	Muhammad Tahir	Habib Jan	B.Sc M.Ed	DEO Dir(L)	1997	5.14.1972	Dir	8.31.1994	05.05.2011	
78	Farman Ullah	Aman Ullah	M.a M.Ed	DEO Peshawar	2000	1.1.1975	Peshawar	05.05.2011	05.05.2011	
79	Syed Ikram	Syed Mutamed Khan	M.A M.Ed	DEO Mardan	2002	3.15.1975	Mardan	6.24.1997	05.05.2011	
80	Muhammad Azam Khan	Gul khan	M.A B.Ed	DEO Bannu	2002	7.18.1977	FR.Bannu	05.05.2011	5.10.2011	
81	Hameed Ur Rehman	Saeed Ur Rehman	M.A M.Phil (Edu)	Assistant Director	2000	4.4.1978	Peshawar	11.7.2005	5.10.2011	
82	Saeed Mehmood	Hazrat Mehmood	M.A M.Ed	DEO Buner	1995	1.7.1967	Bunir	6.1.1996	05.05.2011	
83	Fazle Qadir	Ali Asghar	M.A M.Ed	DEO Haripur	1995	4.10.1967	Haripur	9.17.1986	5.10.2011	
84	Faheem Jan	Alif Khan		DEO Peshawar		3.15.1969	Peshawar	05.05.2011	05.05.2011	
85	Aurag Zeh	Paidad khan	M.A M.Ed	DEO Shangla	1998	4.10.1969	Shangla	05.05.2011	05.05.2011	
86	Asad Ullah Shah	Nawab Ali Shah	M.A M.Ed	DEQ Bannu	1994	4.7.1969	Bannu	9.1.1994	05.05.2011	
87	Farman Ullah	Afsar Khan	MA.M.Ed	DEO Swabi	1998	2.2.1971	Swabi	9.1.1992	05.05.2011	
88	Abdul Waheed	Abdul Qadir	M.A M.Ed	DEO Abbottabad	1999	3.14.1971	Abbott Abad	05.05.2011	05.05.2011	
89	Altaf Hussain	Nasrullah Khan	M.Phil M.Ed	DEO MKD	1999	4.7.1971	MKD	4.13.1996	05.05.2011	
90	Muhammad Alauddin	Muhammad Iqbal Din	M.A B.Ed	DEO Bannu	1995	4.5.1971	FR. Bannu	5.26.1999	05.05.2011	
91	Salih Badashah	Lal Badashah	M.Sc M.Ed	DEO L.Marwat	1998	9.1.1971	L. Marwat	4.23.1996	05.05.2011	
92	Akber Ghani	Fatch Muhammad	M.A M.Ed	DEO Dir(L)	1998	5.7.1972	Dir	3.17.1992	05.05.2011	
93	Muhammad Azeem Khan	Nawab Khan	M.A M.Ed	Assistant Director	1999	3.3.1973	NW Agy:	16.06.2004	5.12.2011	

S.#	Name & Designation	Father's name	Qualification	Place of posting	Year of passing B. Ed	Date of birth	Domicile	Date of Ist: Apptt: in Education Department	Date of Apptt: on ADEO post	Remarks
94	Sikandar Hayat	Sadiq ullah	MA.M.Ed	DEO Swabi	1992	11.20.1973	Swabi	9.1.1992	05.05.2011	
95	Muhammad Noor Sultan	Dilawar Khan	M.A M.Ed	DEO DI Khan	2000	2.22.1976	DI Khan	4.21.1999	05.05.2011	
96	Wisal Muhammad	Dost Muhammad	MSc.M.Ed	DEO Charsadda	2004	8.11.1979	Charsada	5.10.2011	5.10.2011	
97	Nisar Ahmad	Painda Gul	M.A M.Ed	DEO Mardan	1994	4.1.1964	Baj Agy:	10.15.1992	5.10.2011	
98	Muhammad Iqbal	Baz Mulla	M.A M.Ed	DEO Dir	1993	11.20.1964	Dir	05.05.2011	05.05.2011	
99	Zahcerud Din	Muhammad Saeed	M.Sc M.Ed	DEO Dir(L)	1993	3.2.1965	Dir	7.12.1999	05.05.2011	
100	Habib Ullah	Muhammad Aslam	M.A B.Ed	DEO Tank	1996	2.2.1974	Tank	4.1.1993	05.05.2011	
101	Hafiz Fazl e Akber	Gohar	M.A M.Ed	DEO Swabi	2002	4.5.1978	Swabi	1.21.1997	05.05.2011	
102	Mir Samad Khan	Hakeem Khan	M.A M.Ed	DEO Battagram	2002	5.12.1971	Batgram	11.22.1999	05.05.2011	
103	Muhammad Ishtiaq	Muhammad Latif	M.A M.Ed	DEO Peshwar	2004	9.29.1975	Peshawar	5.6.1996	05.05.2011	
104	Muhammad Naeem	Mumtaz Khan		DEO Karak		5.25.1976	Karak	05.05.2011	05.05.2011	
105	Syed Anwar Ali Shah	Syed Mehmood Shah	M.A M.Ed	DEO Charsadda	2002	11.20.1971	Mohd Agy	5.13.2011	5.23.2011	
106	Muhammad Sharif	Sher khan	M.A M.Ed	DEO Hangu	1998	3.1.1970	Kuram	12.3.1994	5.10.2011	
107	Abdul Qayum khan	Abdul Hanan	M.Sc B.Ed	Assistant Director	2000	3.16.1971	Bannu	11.7.2005	5.23.2011	
108	Ihsan ullah	Amar sher	M.A M.Ed	DEO Mansehra	1997	8.14.1971	Mohd Agy:	1.17.1995	5.10.2011	
109	Habib Ullah	Muhammad Iqbal		DEO Peshawar		12.10.1973	Peshawar	05.05.2011	05.05.2011	
110	Muhammad Hayat Khan	Masal khan	M.S (Edu)	DEO Nowshera	2000	4.14.1975	Nowshera	6.23.1997	05.05.2011	
111	Sultan Muhammad Khan	Ali Akber	M.A M.Ed	DEO Mardan	2004	4.1.1978	Mardan	4.29.1999	05.05.2011	
112	Muhammad Ishaq	Muhammad	M.A M.Ed	DEO MKD	2001	6.23.1978	MKD	10.27.1994	05.05.2011	
113	Fayaz uddin	Jehan Badashah	M.A M.Ed	DEO Dir (U)	2004	3.14.1979	Dir	05.05.2011	05.05.2011	
114	Muhammad Hussain	Mir Abas Khan	M.A B.Ed	DEO Karak	1996	4.14.1973	Karak	05.05.2011	05.05.2011	
115	Muhammad Asif Khan	Muhammad Akram Khan	M.A M.Ed	DEO Abbottabad	1996	10.5.1964	Abbott Abad	05.05.2011	05.05.2011	
116	Atta Ullah Shah	Ubaid Shah	M.A (Edu)	DEO Swabi	1991	3.6.1965	Swabi	9.4.1986	05.05.2011	
117	Said Zamin Shah	Aqalmin Shah	M.A B.Ed	DEO MKD	1992	3.8.1965	MKD	10.10.1986	05.05.2011	

S.#	Name & Designation	Father's name	Qualification	Place of posting	Year of passing B. Ed	Date of birth	Domicile	Date of 1st Apptt: in Education Department	Date of Apptt: on ADEO post	Remarks
118	Umar Farooq	Bahramand	M.A B.Ed	DEO Buner	1994	3.18.1966	Buner	2.8.1990	05.05.2011	
119	Syed Ihsan ullah Shah	Syed Lal Badashah	M.A M.Phil	DEO Peshawar	1996	5.1.1966	Peshawar	11.10.1994	05.05.2011	
120	Imtiaz Ali	Haji Hayat Gul	M.Sc B.Ed	Assistant Director		10.12.1966	Peshawar	05.05.2011	05.05.2011	
121	Iftekhar Ali Khan	Zarif Khan	M.A M.Ed	DEO Mardan	1996	3.4.1968	Mardan	3.3.1992	05.05.2011	
122	Pir Muhammad Khan	Nadir Khan	M.A M.Ed	DEO Dir (U)	1996	5.9.1968	Dir	5.19.1987	05.05.2011	
123	Sakin Shah	Muhib Ali Shah	M.A M.Ed	GHS Urmur	1998	10.4.1969	Peshawar	3.17.1992	05.05.2011	
124	Iran Gul	Naseer Khan	M.Sc M.Ed	DEO Tank	1997	4.2.1970	Tank	4.6.1999	05.05.2011	
125	Mushtaq Ahmad	Gulzar Ahmad		DEO Kohat		12.20.1970	Peshawar	05.05.2011	05.05.2011	
126	Inam ullah	Taj Muhammad	M.A M.Ed	DEO Peshawar	1998	1.21.1971	Peshawar	4.19.1994	05.05.2011	
127	Tahir Ahmad	Rab Nawaz Khan	M.Sc M.Ed	DEO L.Marwat	1999	1.4.1974	L.Marwat	2.21.1998	05.05.2011	
128	Zahir Qamar	Shamsul qamar	M.Sc B.Ed	DEO Mardan	1999	2.3.1975	Peshawar	05.05.2011	05.05.2011	
129	Ajceb ullah	Saif ullah	M.A M.Ed	DEO Dir (U)	2000	11.16.1976	Dir	05.05.2011	05.05.2011	
130	Wali ur Rehman	Fojun Khan	M.A M.Ed	DEO Batiagram	2000	1.4.1977	Batgram	05.05.2011	05.05.2011	
131	S.Irshad Ali	Ali Afsar	M.A M.Ed	DEO Abbottabad	2000	5.9.1977	A.Abad	4.11.1996	05.05.2011	
132	Said Badashah	Ali Ahmad	M.A M.Ed	DEO Haripur	1991	3.1.1965	Swabi	11.26.1986	05.05.2011	
133	Hafiz Muhammad Zia Ullah	Ajab gul	M.A M.Ed	DEO Kohat	1995	1.1.1967	Kohat	12.4.1985	05.05.2011	
134	Abdul Halim	Yamin	M.A M.Ed	DEO Shangla,	1998	4.6.1968	Shangla	11.10.1994	05.05.2011	
135	Syed Anwar Shah	Syed Mardan shah	M.A M.Phil	DEO Manshra	1995	3.19.1969	Manshra	3.26.1990	05.05.2011	
136	Rooh Ullah Jan	Misbahuddin	M.A M.Ed	DEO Mardan	1995	1.5.1970	Mardan	3.24.1992	05.05.2011	
137	Asmat ullah	Atta Muhammad	M.A M.Ed	DEO DI Khan	1994	9.1.1970	DI Khan	11.19.1992	05.05.2011	
138	Nasrumin ullah	Khan ullah	M.A M.Ed	GHS Amangar	1994	12.12.1970	Nowshera	12.10.1990	05.05.2011	
139	Abdullah Khan	Zargohan shah	M.A M.Ed	DEO Karak	1994	2.12.1971	Karak	11.19.1994	05.05.2011	
140	Arshad Mehmood	Ghulam Nabi	M.A M.Ed	DEO Haripur	1997	12.24.1971	A.Abad	3.10.1993	05.05.2011	
141	Muhammad Irfan	Mian fazle dayan	M.A B.Ed	DEO Nowshera	1998	10.01.1972	Nowshera	12.9.1999	05.05.2011	

S.#	Name & Designation	Father's name	Qualification	Place of posting	Year of passing B. Ed	Date of birth	Domicile	Date of Ist. Appnt: in Education Department	Date of Appnt: on ADEO post	Remarks
142	Wazir Zada	Sahib zada	M.A.M.Ed	DEO Mardan	1996	4.15.1972	Mardan	2.27.1992	05.05.2011	
143	Munibur Rehman	Abdul ghafoor	M.A M.Ed	DEO Abbottabad	1998	9.10.1973	Abböt Abad	3.23.1992	05.05.2011	
144	Sajjad Rasheed	Abdur Rasheed	M.A M.Ed	DEO Peshawar		8.8.1970	Peshawar	5.7.1996	5.10.2011	
145	Noor Ajab khan	Noor Muhammad khan	M.A B.Ed	DEO Karak	2001	6.4.1972	Karak	05.05.2011	05.05.2011	
146	Bismillah Jan	Abdul ghafar	M.Sc M.Ed	DEO Peshawar	2000	4.27.1974	Peshawar	7.1.1997	05.05.2011	
147	Muhammad Sadiq	Muhammad kamal	MSc.M.Ed	DEO Mardan	2002	4.6.1974	Mardan	7.16.1997	05.05.2011	
148	Hashim Khan	Muhammad Nawaz Khan	M.A B.Ed	DEO L.Marwat	2001	1.15.1975	L Marwat	5.10.2011	5.10.2011	
149	Muhammad Ishfaq Elahi	Farman Elahi		DEO Battagram		11.10.1976	Peshawar	05.05.2011	5.23.2011	
150	Sajjad Ahmad	Qazi fazle Hanan	M.Sc M.Ed	DEO Charsadda	2001	4.3.1977	Charsada	3.10.2007	5.10.2011	
151	Khalil Ur Rehman	Hastam khan	M.A M.Ed	GMS Jati Bala	1998	4.14.1966	Peshawar	10.17.1988	05.05.2011	
152	Wajih Ud Din	Pazal Mabood Jan	M.A M.Ed	DEO Dir (L)	1998	24.11.1967	Dir	8.29.1994	05.05.2011	
153	Haya Said	Mian said	M.A M.Ed	DEO MKD	2004	6/24/1905	MKD	15.02.1990	05.05.2011	
154	Sir Mast khan	Mir Rehman	M.A M.Ed	PITE	1998	2.1.1969	Mohd Agy:	12.7.1989	5.23.2011	
155	Aman ul Mulk Shah	Said Ali Shah	M.A M.Ed	DEO Buner	1999	3.25.1969	Bunir	5.31.1994	05.05.2011	
156	Muhammad Tahir	Sawal Faqir	M.A M.Ed	DEO Dir(U)	1998	8.18.1969	Dir	16.08.1887	5.13.2011	
157	S.Sakhawat Ali shah	S.Chirgah shah	M.A B.Ed	DEO Peshawar	1998	5.15.1970	Peshawar	10.16.1988	05.05.2011	
158	Nasrullah khan	Nadar khan	M.A B.Ed	DEO Dir(L)	2000	1.1.1971	Dir	05.05.2011	05.05.2011	
159	Janas khan	Lal Rahim	MSc.M.Ed	DEO Charsadda	2001	2.2.1971	Charsada	1.14.1998	05.05.2011	
160	Zahir ur Rehman	Mir hussain	M.Sc M.Ed	DEO Hangu	2000	2.6.1973	Hangu	12.16.1999	05.05.2011	
161	Noor Muhammad	Said Muhammad	M.A B.Ed	DEO Dir (L)	2000	1.2.1975	Baj Agy:	05.05.2011	5.10.2011	
162	Mukhtiar khan	Ismail khan	MSc.B.Ed	DEO Mardan	1999	3.7.1972	Mardan	4.11.1996	05.05.2011	
163	Shafiq ur Rehman	Zia ul haq	M.B.A M.Ed	DEO Abbottabad	2002	5.25.1972	Abböt Abad	05.05.2011	05.05.2011	
164	Zakir Hussain	Hussain Gul	M.A B.Ed	DEO MKD	2001	2.16.1973	MKD	23.04.1998	05.05.2011	
165	Mousaf Shah	Abdur Rahim	M.S (Fdu)	DEO Nowshera	1999	3.27.1973	Nowshera	5.28.1995	05.05.2011	

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S.#	Name & Designation	Father's name	Qualification	Place of posting	Year of passing B. Ed	Date of birth	Domicile	Date of Ist. Apptt: in Education Department	Date of Apptt: on ADEO post	Remarks
166	Zahir Shah Khan	Sardar Khan	M.Sc.M.Ed	DEO Peshawar	2000	4.3.1973	Peshawar	9.25.1993	05.05.2011	
167	Sajid Ullah	Zahir Shah	M.Sc M.Ed	DEO Charsadda	1999	4.30.1974	Mohd Agy	1.1.2001	5.10.2011	
168	Said Zahid	Faiz Mehmood	M.A M.Ed	DEO Buner	2000	4.1.1975	Bunir	6.20.1993	05.05.2011	
169	Khalid Khan	Khan Bahdar				4.6.1975	Mardan	05.05.2011	05.05.2011	
170	Kiramat ullah	Sattar Azman	M.A B.Ed	DEO Karak	1999	4.12.1975	FR.Bannu	05.05.2011	5.23.2011	
171	Muhammad Afsar	Hassan Zeb	M.A M.Ed	DEO Swabi	2002	1.5.1976	Swabi	4.20.1999	05.05.2011	
172	Hamood ur Rehman	Maqbool ur Rehman	MA.M.Ed	Assistant Director	2001	5.15.1977	Peshawar	05.05.2011	05.05.2011	
173	Taj Alam	Sher Alam	M.Sc B.Ed	DEO DI Khan	2002	11.20.1977	FR.Bannu	5.23.2011	5.23.2011	
174	Abdul Karim	Jehinger Khan	M.A M.Ed	DEO Peshawar	2003	6.16.1981	Peshawar	2.23.2007	5.10.2011	
175	Miftah ud Din	Akber Khan	M.A M.Ed	DEO Chitral	1993	10.17.1961	Chitral	12.29.1984	05.05.2011	
176	Abid Hussain	Hussain Ghulam	M.Sc B.Ed	DEO Kohat	1998	6.16.1968	Kurram	10.10.1995	05.05.2011	
177	Ejaz Ahmad	Ghulam Mohi Ud Din	MA B.Ed	DEO (M) Peshawar		1.4.1970	Peshawar	05.05.2011	05.05.2011	
178	Muhammad Ishtiaq	Muhammad Ayub	M.Phil (Edu)	DEO Manshara	1994	2.15.1970	Manshara	12.15.1990	05.05.2011	
179	Muhammad Arif	Muhammad Junaid Khan	M.Sc M.Ed	DEO Swabi	1997	4.14.1971	Swabi	9.19.1995	05.05.2011	
180	Zanir Ahmad Khan	Ahmad Nawaz Khan	M.Sc M.Ed	DEO DI Khan	1995	4.12.1973	DI Khan	2.15.1996	05.05.2011	
181	Shakeel Ahmad	Muhammad Ahmad	M.Sc M.Ed	DEO DI Khan	2000	5.16.1973	DI Khan	1.14.1998	5.10.2011	
182	Muhammad Saleem	Muhammad Azeem Khan	M.A M.Phil (Edu)		1996	1.6.1974	Peshawar	5.19.1994	05.05.2011	
183	Zafar Khan	Munawar Khan		DEO Abbottabad		12.25.1974	Abbot Abad	05.05.2011	05.05.2011	
184	Jehangir Khan	Shah Jehan	M.A M.Phil (Edu)	DEO Charsadda	1999	4.15.1975	Peshawar	2.19.1998	05.05.2011	
185	Nisar Muhammad	Bahdar Khan	M.A M.Ed	DEO L.Marwat	1999	11.19.1975	L. Marwat	5.15.2002	10.20.2011	
186	Zafar Iqbal	Amir Badashah				12.10.1975	Peshawar	05.05.2011	05.05.2011	
187	Waseem Fazal	Fazlu Rehman	M.B.A M.Ed	DEO Abbottabad	1994	6.20.1967	A. Abad	10.1.1985	5.13.2011	
188	Tahir Shah	Qadar Shah	MA.M.Ed	DEO Battagram	1993	9.1.1968	Mardan	12.1.1987	5.13.2011	
189	Abdul Waheed	Abdul Ghani	MA B.Ed			1.9.1969	Karak	05.05.2011	05.05.2011	

AD

16/8/16



S.#	Name & Designation	Father's name	Qualification	Place of posting	Year of passing B. Ed	Date of birth	Domicile	Date of Ist. Appt: in Education Department	Date of Appt: on ADEO post	Remarks
190	Races Khan	Sher Zaman Khan	M.A M.Ed	DEO MKD	1997	08.05.1972	MKD	18.08.1993	05.05.2011	
191	Shams ur Rehman	Hafiz Abdul hadi	M.A M.Ed	DEO Battagram	1994	3.13.1967	Hangu	2.3.1990	5.27.2011	
192	Syed Fazali Amin	Mir Hatim Shah	M.A M.Ed	DEO Charsadda	1997	3.11.1971	Charsada	01.04.1996	05.05.2011	
193	Sahib Kamal	Haji Fazal Zaman	M.A M.Phil (Edu)	DEO Nowshera	2000	5.11.1972	Nowshera	3.22.1992	5.23.2011	
194	Saeed Ahmad	H.Delber Khan	M.Sc M.Ed	DEO Shangla	2000	10.4.1972	Shangla	1998	05.05.2011	
195	Tariq Ahmad	Fazli Rashid	M.A M.Ed	DEO Shangla	2002	6.10.1973	Dir	5.1.1999	7.23.2011	
196	Muhammad Arshad Sharif	Sharif Khan	M.A M.Ed	DEO Kohat	2002	7.26.1973	Kohat	4.9.1999	5.13.2011	
197	Ulfat Ali Shah	Daftar Shah	M.A B.Ed	DEO DIKhan	1995	4.1.1974	SW Agy:	1.29.2002	5.13.2011	
198	Qasim Ali Khan	Mumtaz ali khan				1.1.1976	Peshawar	05.05.2011	05.05.2011	
199	Hidayat ullah	Khan Zada Pacha	M.Sc B.Ed	DEO Dir(L.)	1996	6.15.1963	Dir	4.15.1993	05.05.2011	
200	Abdul Khaliq	Sultan Mehmood	M.A M.Ed	DEO Mardan	1996	4.2.1971	Mardan	12.22.1994	05.05.2011	
201	Abdullah Khan	Sadin Khan	M.A M.Ed	DEO Hangu	1998	4.25.1970	Kurram	6.21.1992	5.10.2011	
202	Javaid Iqbal	Ghulam Qadar	M.A M.Ed	DEO Mardan	1999	3.18.1973	Baj Agy	5.2.2011	5.12.2011	
203	Malik Khan	Shehzad Khan	M.A M.Ed	DEO Tank	1996	4.20.1973	SW Agy:	9.24.2003	05.05.2011	
204	Naveed Ahmad	M uhammad Farid Khan	M.A M.Ed	DEO Mansehra	2002	4.5.1974	Mansehra	1.23.1996	05.05.2011	
205	Fazli Subhan	Fazli hanan	M.A M.Ed	DEO MKD	1996	24.02.1965	MKD	15.02.1990	05.05.2011	
206	Sarfaraz Khan	Shahab Ud Don	M.A M.Ed	DEO Mansehra	1992	12.14.1967	-do-	10.11.1994	05.05.2011	
207	Shahab Ud Din	Fazal Manan		DEO Tank		3.12.1970	NW Agy:	05.05.2011	5.23.2011	
208	Sana ullah	Muhammad Sher Khan	M.A M.Phil (Edu)	DEO Bannu	2000	3.8.1974	FR.Bannu	10.6.1994	5.10.2011	
209	Nadeem	Abdul Qayum	M.A M.Phil (Edu)	DEO Mansehra	2004	1.1.1974	Mansehra	2.3.2007	05.05.2011	
210	Ghulam Jilani	Darwaish	M.A M.Ed	DEO Mansehra	1998	10.29.1965	-do-	30.06.1985	05.05.2011	
211	Syed Mehmood ul Hassan	Syed Sarwar Shah	M.A B.Ed	DEO Abbottabad		20.3.1970	Abbot Abad	05.05.2011	05.05.2011	
212	Rab Nawaz	Gul Dad Khan		DEO Abbottabad		4.15.1973	Abbot Abad	05.05.2011	05.05.2011	
213	Jehanzeb Ali	Fariq Khan	M.A M.Ed	DEO Charsadda	2000	4.16.1974	Mohd Agy:	05.12.2011	5.12.2011	

16/8/15


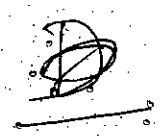
S.#	Name & Designation	Father's name	Qualification	Place of posting	Year of passing B.Ed	Date of birth	Domicile	Date of 1st Apptt. in Education Department	Date of Apptt. on ADEO post	Remarks
214	Sange Faras	Malook	M.Sc M.Ed	DEO Charsadda	2001	4.12.1972	Mohd Agy;	2.3.2011	10.05.2011	
215	Muhammad Ijaz	Mir sahib Khan	B.A M.Ed	DEO Tank	1999	9.10.1977	SW Agy:	9.12.2002	5.10.2011	
216	Aqil Wazir	Gul Nazeer	M.Sc B.Ed	DEO L.Marwat	2003	1.3.1980	FR. Laki	9.5.2002	5.10.2011	
217	Maroof Khan	Akhya jan				4.7.1975	FR. Bannu	05.05.2011	05.05.2011	

## CERTIFICATE:

It is certified that the Seniority List is Final, Undisputed and not Subjudice in any court.

Deputy Director (Estab)  
E&SE Khyber Pakhtunkhwa  
PESHAWAR

17/8/18  
16/8/18

  
  
 Reply/2

**17. Postings/Transfers to Pakistan Missions Abroad (Other Than Posts Administered by Ministry of Foreign Affairs) - 17**

- (i) Posts in foreign missions abroad should be filled on the basis of detailed job descriptions to be prepared by the controlling Ministry;
- (ii) The controlling Ministry should prepare a panel of suitable officers for the post;
- (iii) The panel of suitable officers should be considered by a Committee of the controlling Ministry including a representative of the Establishment Division;
- (iv) The recommendations of the Committee should be considered by the Special Selection Board; and
- (v) The recommendations of the Special Selection Board should be submitted to the competent authority for approval.

2. Ministries/Divisions are requested to proceed further in the matter of postings/transfers as above and bring these instructions to the notice of all departments, offices, autonomous/semi-autonomous bodies and corporations under their control for strict compliance.

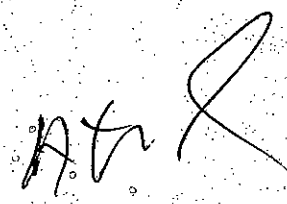
[Authority.- Estt. Division O.M. No.10/10/94-R.2, dated 22-3-1994].

Sl. No. 4

**Posting of Serving Husband/Wife at the Same Station**

The government has taken note of the socio-economic problems and hardship faced by husbands and wives in government service due to posting at different stations of duty, and it has been decided to prescribe the following guidelines to facilitate posting of husband and wife at the same station:

- (i) Where a request is made for posting at a different station in the same department/service/cadre in which an employee is already serving, the request may be accepted subject to availability of a post in the same BPS.
- (ii) If a request involves temporary deputation to another department, it may be processed in consultation with the department concerned, and may be accepted on the prescribed terms of deputation subject to availability of a post in the same BPS.
- (iii) When a request is made for permanent transfer to absorption in another department/agency, the request may be processed in consultation with the department concerned, subject to the condition that in the event of permanent transfer, seniority shall be determined in accordance with the



R/2

## Civil Servants (Seniority) Rules, 1993.

- (iv) If there is a tie between two or more government servants for posting at the same station in the same department/unit of an organization, the government servant with greater length of service may be preferred.
- (v) Request for posting by a spouse facing serious medical problems may be accorded highest priority.
- (vi) Spouses already posted at one station, including those posted on deputation beyond the prescribed maximum period, may not normally be disturbed without compelling reasons of public interest. Requests for extension of deputation period beyond the permissible limit may be considered with compassion if interests of public service would permit.

## 2. The above guidelines are subject to the following conditions:-

- (i) Posting of husband and wife at the same station should not be made by dislocation of any government servant already serving at a particular station unless his transfer is necessitated by compelling reasons of public interest or within the framework of general policy of postings and transfers.
- (ii) The prescribed selection authority should be consulted in each case.

3. All government servants whose spouses are in government service may be asked to furnish, at the end of every calendar year, the particulars of their spouses to their controlling Ministries/Divisions so as to facilitate maintenance of ICP Charts and up-to-date monitoring of the situation.

4. The above guidelines may be circulated to the autonomous bodies under the charge of Ministries/Divisions for adoption, with such modifications, as may be considered necessary.

[Authority.- Estt. Division O.M.No. 10/30/97-R.II, dated 13-5-1998].

Sl. No. 5

**Posting of Unmarried Female Government Servants at the Place of Residence of Parents/Family**

It has been brought to the notice of government that unmarried female

Chapter 2, Sl.No.147.  
Individual Career Planning.

*Atul*

BANNU BENCH, BANNU.

Writ Petition No. 1020.F of 2018

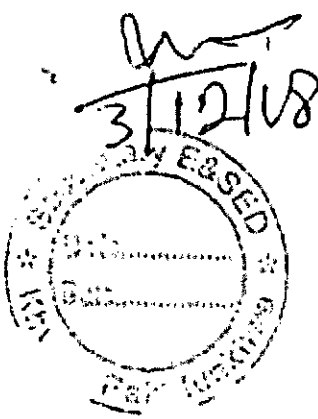


Muhammad Farooq Sub Divisional Education Officer  
Karak presently under transfer as S.D.E. O(IV) Try: 68/11/18  
Tehsil & District Sawat ----- Petitioner (27)

VERSUS Reply/3 15

1. Provincial Govt: of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa Civil Secretariat, Peshawar.
2. Secretary Elementary & Secondary Education Department Civil Secretariat, Peshawar.---Respondents.

Note:- Addresses given above are sufficient for proper service.



=====  
WRIT PETITION UNDER ARTICLE 199 OF THE CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN, 1973 AGAINST THE NOTIFICATION NO. SO (SM) E & SED/2-1/2018/POSTING/TRANSFER/2018 DATED PESHAWAR THE NOVEMBER 13, 2018 VIDE WHICH THE PETITIONER HAS BEEN TRANSFERRED FROM SUB DIVISIONAL EDUCATION OFFICER(MALE) PRIMARY KARAK TO SUB DIVISIONAL EDUCATION OFFICER(MALE) BAHRAIN, SAWAT.

Photocopy of impugned notification dated Peshawar The November 13, 2018 is enclosed as Annexure "A")

=====  
Respectfully Sheweth:  
**ATTESTED**  
EXAMINER  
Peshawar High Court  
Bannu Bench

1/11/18

FACTS.

1. That the petitioner is bonafide and permanent residents of village Mitha Wala Tehsil & District Karak and was serving as Assistant District Education Officer BPS-16 and was adjusted as Incharge Sub Divisional Education Officer BS-17 (Male), Karak in the office District Education Officer (Male), Karak.

Filed Today  
M.

AG

Education Officers (ASDEOs) BS-16 to post of Sub Divisional Education Officer (S.D.E.O) BS-17 vide notification bearing No. SO.SO (SM) E & SED/3-2/2018/Promotion of ASDEOs (BS-16 to SDEOs BS-17 (Management Cadre) Dated Peshawar the September 26, 2018 in the Elementary & Secondary Education Department on regular basis whereby the petitioner has been shown at S. No. 2. -----(Photocopy of promotion notification of ASDEOs (BS-16 to SDEOs BS-17 Dated Peshawar the September 26, 2018 is enclosed as Annexure "B").

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3. That the Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar has issued adjustment order vide notification No. SO.SO (SM) E & SED/3-2/2018/Promotion of ASDEOs (BS-16 to SDEOs BS-17 dated Peshawar the October 29, 2018 whereby the petitioner has been adjusted as SDEO (BS-17) Karak shown at S. No. 25. -----(Photocopy of adjustment notification Dated Peshawar the October 29, 2018 is enclosed as Annexure "C").

4. That in compliance of the above mentioned adjustment notification dated Peshawar the October 29, 2018, the petitioner resumed his charge report as SDEO (Male), Karak vide Endst: No. 1043-47 dated 30-10-2018 in the office of District Education Officer (Male), Karak. (Photocopy of charge Report is enclosed as Annexure "D").

A  
Fawaz

5. That after resumed his charge as SDEO(Male) Primary, Karak the petitioner started his official duty in the office of District Education Officer (Male), Karak.

6. That just after 14 days of adjustment order dated November 29, 2018, the Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar issued another order of posting / transfer of SDEOs vide Notification SO (SM) E & SED/2-1/2018/Posting/Transfer/2018 Dated Peshawar The November 13, 2018 whereby the petitioner has been transferred from SDEO (M) Primary Karak to SDEO (M) Bahrain Swat -----(Photocopy of notification dated Peshawar The November 13, 2018 is already enclosed as Annexure "A").

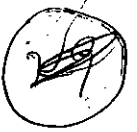
ATTESTED  
EXAMINER  
Peshawar High Court  
Khyber Pakhtunkhwa

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7. That the petitioner is posted to

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issued without lawful authority and is purely based on political grounds hence the same as assail before this honourable court inter alia on the following grounds.

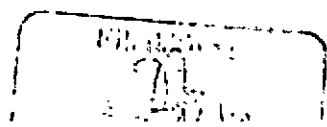


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Grounds.

- a. That the impugned posting/transfer order dated November 13, 2018 whereby the petitioner has been transferred from SDEO (M) Primary Karak to SDEO (M) Bahrain Swat is illegal, unlawful against the law & facts, issued without lawful authority and is not sustainable in the eye of law.
- b. That the petitioner has not been completed normal tenure which is against the law and based on arbitrary and against the service rules hence liable to be cancelled.
- c. That without assigning any cogent reason the impugned posting/transfer order has been issued by the competent authority on melafide intention and just to adjust the pick & choose of the blue eyed officers at their choice station.
- d. That political interference in the impugned posting / transfer order cannot be ruled out.
- e. That merit position of the petitioner is in 3<sup>rd</sup> position in the whole KP province while in top position in District Karak in seniority list.
- f. That the impugned posting/transfer order is not against vacant post rather is versus transfer which is against the policy and law.
- g. That the aged mother of petitioner is seriously suffering of chronic disease which need proper attention of the petitioner whereas the impugned posting station is far flung area.
- h. That any other point will be agitated at the time of argument with permission of this honourable court.

*A. J. Khan*



ATTESTED

EXAMINER

*A. J. Khan*

=====

Prayer in writ petition.

- 22

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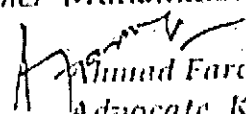
So it is, therefore, most humbly and respectfully prayed that on acceptance of the instant writ petition this honourable court may very graciously be pleased to issue writ directing the respondents to cancel the impugned posting/ transfer No. Notification SO (SM) E & SED/2-1 / 2018 / Posting/Transfer/2018 Dated Peshawar The November 13, 2018 to the extent of petitioner is illegal, unlawful, against the law and facts, passed without lawful authority, based on political victimization and melafide intentions.

Interim Relief

It is further most humbly and respectfully prayed that this honourable court may be suspended the operation of the impugned notification No. Notification SO (SM) E & SED/2-1/2018/Posting/Transfer/2018 Dated Peshawar The November 13, 2018 only to the extent of petitioner till final decision of the main writ petition.

=====

Dated:- 14-11-2018 Petitioner Muhammad Farooq

Through  Ahmad Farooq Khattak  
Advocate, Karak.

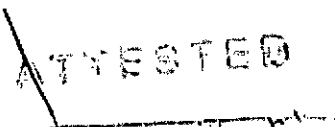
Certificate

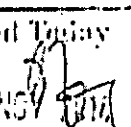
*Certified that no such like writ petition has been filed on similar grounds earlier before this court or any other court.*

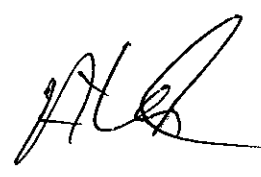
*Petitioners Muhammad Farooq*

Law Books

1. The constitution of Islamic Republic of Pakistan, 1973.
2. Case law according to need.

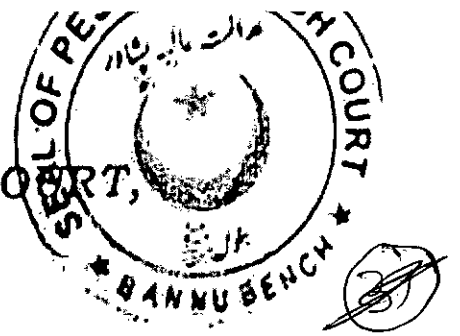
ATTESTED  
  
EXAMINER  
Peshawar High Court  
Manna Bhatt

Filed Today  
  
Additional Registrar





JUDGMENT SHEET  
IN THE PESHAWAR HIGH COURT,  
BANNU BENCH.



(Judicial Department)

W.P No. 1020-B of 2018

— 22

*Muhammad Farooq*

Vs

*Govt. of Khyber Pakhtunkhwa etc:*

JUDGMENT

Date of hearing 26/11/2018

Appellant-Petitioner By Ahmad Farooq Khattak A/c

Respondent \_\_\_\_\_

SHAKEEL AHMAD, J.--- Through the instant petition filed

U/A-199 of the Constitutional of Islamic Republic of Pakistan 1973,  
the petitioner has assailed the notification dated 13.11.2018,  
whereby he was transferred from District Karak to Bahrain.

2. Brief facts of the case are that the petitioner was posted  
as SDEO (M) Karak in BPS-17, vide impugned notification dated

\*Imranullah\* (D:10) Mr. Justice Muhammad Nasir Mahfooz and Justice Shakeel Ahmad

*Shakeel Ahmad*

petition.

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3. Learned counsel for the petitioner argued that transfer of the petitioner is politically motivated, therefore, the same is liable to be set-aside, however, when he was confronted with the Article-212 of the Constitution of Islamic Republic of Pakistan, 1973, he stated that he would not press the instant petition, the same may be treated as departmental appeal and sent to the competent authority for decision in accordance with law.

4. IN view of the above, this petition is treated as departmental appeal and sent to Secretary Elementary and Secondary Education, Civil Secretariat, Peshawar for decision in accordance with law.

SD/Mr. Justice (Retired) Nasir Mahmood  
 SD/Mr. Justice (Retired) Iqbal Ahmad J

**Announced.**  
 26.11.2018

CERTIFIED TO BE TRUE COPY

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 28/11/2018

Examiner  
 Peshawar High Court Bench  
 Authorised under Section 87 of  
 The Qanun-e-Sadar 1984

29/11/18

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P06657141

14202-1353299-5

درخواست دہندہ کا شناختی کارڈ نمبر:

محمد فاروق

درخواست دہندہ کا نام

نمبر شمار	بچے کا نام اور رجسٹریشن نمبر	والد کا نام اور شناختی کارڈ نمبر	جنس / رشتہ	پیدائش کا ضلع / تاریخ پیدائش	معدوری
1	مشال 14202-2501132-6	محمد فاروق 14202-1353299-5	لاڑکی بیٹی	کرک، کرک 2013-03-02	کوئی نہیں
2	فریاد 14202-8449976-0	محمد فاروق 14202-1353299-5	لاڑکی بیٹی	کرک، کرک 2014-06-27	کوئی نہیں
3	ساراج 14202-8449976-0	محمد فاروق 14202-1353299-5	لاڑکی بیٹی	کرک، کرک 2015-03-20	کوئی نہیں

- 1- اس فیملی کے مندرجہ بالا اٹھارہ سال سے کم عمر 3 بچے / بچیاں کا اندراج ہمارے ریکارڈ میں موجود ہے۔
- 2- درج شدہ بچے کی عمر اٹھارہ سال ہوتے ہی شناختی کارڈ کے حصول کیلئے درخواست جمع کروائیں۔
- 3- اس سرٹیفکیٹ کو مستحکم کر رکھیں کیونکہ بچوں کے اٹھارہ سال کی عمر کو پہنچنے پر انہی نمبروں کے حوالے سے شناختی کارڈ جاری کئے جائیں گے۔
- 4- نوزائیدہ بچے کا فوری طور پر اندراج کروائیں اور نیار رجسٹریشن سرٹیفکیٹ حاصل کریں۔
- 5- کوائف کی تبدیلی کی صورت میں نیار رجسٹریشن سرٹیفکیٹ حاصل کریں۔

عثمان یوسف حسین

دستخط رجسٹرار جنرل

تاریخ اجراء 2017-08-03

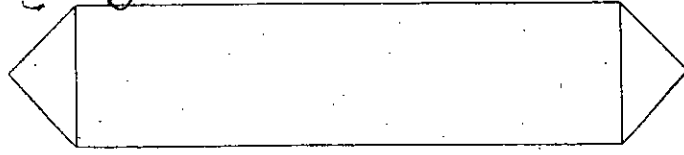
ڈاک خانہ کرک، سیٹھا والا، تحصیل ضلع کرک



1420213532995

سرٹیفکیٹ درج بالا بچوں کی شناخت اور مذکورہ بالا کوائف و معلومات ثابت کرنے کیلئے تازہ نمبروں کے ذمہ (6) 9 ناردر آڈیٹس مجریہ سن 2000، بطور ثبوت قابل قبول ہے

بعدالت سندروس سردیوں کی آمد



2019ء پنجاب ایسٹرن ڈسٹرکٹ  
بنام شوکت

مقرر

مورخہ

مقدمہ

دعویٰ

جرم

## باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کلہ کاروائی متعلقہ

آن مقام کے لئے **مقرر** کیلئے **مقرر**

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز  
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور  
بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق  
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی  
اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت  
مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے  
تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے  
اور اس کا ساختہ پر داختم منظور قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے  
سبب سے وہ ہوگا۔ کوئی تاریخ پیش مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں  
گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

2019

ماہ مئی

10

المرقوم

مقرر

العواہ

العواہ

کے لئے منظور ہے۔

مقام



12. The first part of the document is a list of names and addresses.

The names are listed in alphabetical order. The addresses are listed in the same order as the names.

The list of names and addresses is as follows:

1. Mr. John Doe  
123 Main Street  
New York, NY 10001

2.

3.

4.

5.

6.

①

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

S.A.# 511/2019

Gul Faraz.....Appellant.

**VERSUS**

Secretary E&SE, Govt: of Khyber Pakhtunkhwa & others..... **Respondents.**

**JOINT PARAWISE COMMENTS FOR & ON BEHALF OF THE RESPONDENTS NO 1 & 02.**

Respectfully Sheweth,

The Respondents submit as under:-

**Preliminary Objections**

1. That the appellant has got no cause of action/locus standi.
2. That the instant appeal is badly time barred.
3. That the appellant has concealed the material facts from this Hon'able Tribunal, hence is liable to be dismissed on this score.
4. That the appellant has not come to this Hon'albe Tribunal with clean hands.
5. That the present appeal is liable to be dismissed for mis-joinder & non joinder of necessary parties.
6. That the appellant is estopped by his own conduct to file the instant appeal.
7. That the instant appeal is not maintainable in its present form and also in the present circumstances of the issue.
8. That the impugned Notification dated 07/02/2019 of the Respondents is legally competent and is liable to be maintained.

**FACTS.**

1. Para No 1. Correct to the extent that 59 ADEOS/ASDEOS(B-16) were promoted to the post of SDEO (B-17) vide order dated 29/10/2018 and the appellant was adjusted/ posted as SDEO Bahrain Swat while the private Respondent No.4 to SDEO Karak, with the reasons that private Respondent No.4 was senior most in the seniority list of ADEOS in KP, as per notified seniority, whereas the Appellant is at serial No.31, which is very junior in seniority as compare to the Respondent No.4. It is further added that Respondent No.4 MR: Muhammad Farooq was already working against the said post on own pay scale since 28/02/2018 .Copy of the Posting Order dated 29/10/18, seniority and Placement order dated 28<sup>th</sup> Feb: 2018 are attached as Annexure A, B, C .

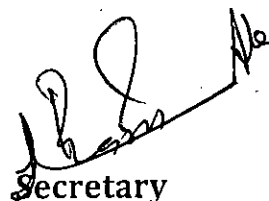
- 2
2. Correct to the extent that the appeal of the Appellant was honored and he was transferred to Karak, while the Respondent No. 4 to Swat on dated 13/11/2018. **Copy of transfer order dated 13/11/2018 is attached as Annexure D.**
  3. Para No.3 is incorrect. The Respondent No.4 filed a writ Petition No.1020-B/2018 before Peshawar High court, Bannu Bench against the transfer order dated 13/11/2018. The honorable High court converted the W.P No.1020/2018 into departmental appeal and sent to appellant authority for decision in accordance with the law and in pursuance of the same plea of the Respondent No. 4, he was again transferred back to Karak on dated 07/02/2019. **Copy of Writ Petition and transfer order dated 7/2/2018 is attached as Annexure E & F.**
  4. Incorrect. As already explained in forgoing para no.3 above.
  5. That Para-6 is legal, however, The Respondents further submits on the following grounds inter-alia.

**Grounds:**

- A. Incorrect. The Order dated 7.02.2019 was according to merit and Law on the basis of Writ. Petition No.1020/2018 of Honorable High Court and the merit in posting was honored.
- B. Incorrect. As per statement of the Appellant he was transferred prematurely after 80 days on 7.02.2019 but the same can also be applied very well on private Respondent no 4, because, on the basise of appellant's request, private Respondent No.4 was transferred to Bahrain Swat on 13.11.2018 just after 14 days of placement, which was more premature than Appellant's claim.
- C. Incorrect, The appellant's transfer to Bahrain was as per hon'ble Court direction the departmental appeal as well as merit position of private Respondent No 4 is higher than merit of Appellant.
- D. Incorrect. The appellant's wife is continuously attending the school and there is no such issue, because the deoportment has not received any complaint of her absence from duty due to illness. As per statement of the Appellant if his wife is seriously ill than she has option to go on retirement on medical ground, because her serious illness can affect the future of innocent students.
- E. Incorrect, the cited judgment has been passed in the light of its own facts and circumstances which cannot be applied to the case in hand keeping in view its own peculiar facts and background.
- F. Incorrect. The Order dated 7.02.2019 has not violated the Spouse Policy because Spouse Policy can be entertained against the vacant post available but not against versus transfer of any other civil servant.

- G. Incorrect. The transfer dated 7.02.2019 is not based on personal liking and disliking.
- H. Incorrect. As per statement of the Appellant the normal tenure of the posting is two year which is in fever to private Respondent no.4 because after promotion on dated 29/10/2018, private Respondent no.4 was first posted in Karak on merit bases then after 14 days, on the bases of appellant appeal the Respondent no.4 was transferred to swat dated 13.11.2018, which is more premature than the Appellant claim.
- I. Incorrect. As already explained in forgoing para no.G above.
- J. Incorrect. The same plea can be applicable on transfer order dated 13.11.2018 which has affected the private Respondent No.4.
- K. The Respondents also seeks permission to advance other grounds and proof at the time of hearing if needed.

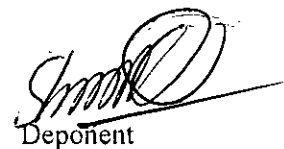
It is therefore, humbly prayed that on acceptance of written reply, the appeal of the appellant may graciously be dismissed please.



Secretary  
E&SE Department.  
(Respondents No. 1 &2)

**AFFIDAVIT**

I, Mr Muhammad Shakil Supdt: E&SED do hereby solemnly affirm and declare that the contents of the instant Parawise Comments are true and correct to the best of my knowledge & belief.



Deponent





10/10/18 (9)

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

Dated Peshawar the October 29, 2018.

**NOTIFICATION**

**NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17):**

Consequent upon their promotion to the post of Sub-Divisional Education Officer Male (BS-17) vide notification of even number dated 26.09.2018, the following SDEOs are hereby posted/adjusted on the posts & stations as mentioned against each:

S#	Name of candidate	Posted as
1	Mr. Zia Ullah	Assistant Director (BS-17), Directorate of E&SE
2	Mr. Shah Jehan Khan	Assistant Director (BS-17), Directorate of E&SE
3	Mr. Muhammad Arshad	Assistant Director (BS-17), Directorate of E&SE
4	Mr. Irshad Khan	SDEO (BS-17) Town-IV Peshawar
5	Mr. Muhammad Zahid Khan	Assistant Director (BS-17), Directorate of E&SE
6	Mr. Muhammad Sohail Khan	Assistant Director (BS-17), Directorate of E&SE
7	Mr. Muhammad Aftab	Assistant Director (BS-17), Directorate of E&SE
8	Mr. Imtiaz Khan	SDEO (BS-17) Swat
9	Mr. Muhammad Saleem	SDEO (BS-17) Pabbi Nowshera
10	Mr. Shams-ul-Islam Niaz	SDEO (BS-17) Kabal Swat
11	Mr. Muhammad Zubair	SDEO (BS-17) Takhtbai Mardan
12	Mr. Hayat Khan	Assistant Director (BS-17), Directorate of E&SE
13	Mr. Ahmad Ullah	SDEO (BS-17) Shabqadar
14	Mr. Muhammad Anwar	SDEO (BS-17) Mardan
15	Mr. Fazl-e-Khuda	SDEO (BS-17) Khadokhel Buner
16	Mr. Amir Badshah	SDEO (BS-17) Mandan Buner
17	Mr. Fida Muhammad	SDEO (BS-17) Town-III Peshawar
18	Mr. Salih Muhammad	SDEO (BS-17) Daggar Buner
19	Mr. Abdul Wahab	SDEO (BS-17) Lahore Swabi
20	Mr. Muhammad Abid	SDEO (BS-17) Rajjar Swabi
21	Mr. Adil Muhammad	SDEO (BS-17) Katlang Mardan
22	Mr. Niaz Wali Khan	SDEO (BS-17) Ghazi Haripur

05 Abdul Qayyum

06 Raees-Ur-Rehman

Directorate of E&SE  
Assistant Director at No correct

*Arshad*



(5)

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

23	Mr. Mehboob Elahi	Assistant Director (BS-17), Directorate of E&SE
24	Mr. Shehzad Nadeem	SDEO (BS-17) Darosh Chitral
25	Mr. Muhammad Farooq	SDEO (BS-17) Karak
26	Mr. Dil Nawaz	SDEO (BS-17) Kohistan
27	Mr. Gul Faraz	SDEO (BS-17) Bahrain Swat
28	Mr. Muhammad Humayun	SDEO (BS-17) Daraban D.I. Khan
29	Mr. Abdul Qayum Khan	Assistant Director (BS-17), Directorate of E&SE
30	Mr. Iftikhar Ahmed	SDEO (BS-17) Battagram
31	Mr. Chanzeb	SDEO (BS-17) Alai Battagram
32	Mr. Sharafat Khan	SDEO (BS-17) Bisham Shangla
33	Mr. Mehmood Iqbal	SDEO (BS-17) Paharpur D.I. Khan
34	Mr. Khalid Naseem	SDEO (BS-17) Prova D.I. Khan
35	Mr. Muhammad Zarif	SDEO (BS-17) D.I. Khan
36	Mr. Muhammad Irshad	SDEO (BS-17) Tall Hangu
37	Mr. Muhammad Rehman Shah	SDEO (BS-17) Bakka Khel Bannu
38	Mr. Waheed Ullah Shah	SDEO (BS-17) Domel Bannu
39	Mr. Muhammad Tariq	Assistant Director (BS-17), Directorate of E&SE
40	Mr. Hamid Rasool	SDEO (BS-17) Bannu
41	Mr. Ali Haider	SDEO (BS-17) Samar Bagh Dir Lower
42	Mr. Muhammad Raza Shah	SDEO (BS-17) Adenzai Dir Lower
43	Mr. Muhammad Islam	SDEO (BS-17) Munda Dir Lower
44	Mr. Muhammad Ajmal	SDEO (BS-17) Oghi Mansehra
45	Mr. Shafiq Ur Rehman	SDEO (BS-17) Darban Mansehra
46	Mr. Raees Ur rehman	Assistant Director (BS-17), Directorate of E&SE
47	Mr. Abdus Samad	SDEO (BS-17) Baffa Mansehra
48	Mr. Raja Babu Jehangir	Assistant Director (BS-17), Directorate of E&SE
49	Mr. Shams Ur Rehman	SDEO (BS-17) Balakot Mansehra
50	Mr. Abdur Rehman Rashid	SDEO (BS-17) Serai Naurang Lakki Marwat
51	Mr. Qadir Shah	SDEO (BS-17) Lakki Marwat
52	Mr. Habib Ur Rehman	SDEO (BS-17) Kulachi D.I. Khan

05

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Raees-Ur-Rehman

ASSISTANT

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(6)

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

53	Mr. Hameed Ullah	SDEO (BS-17) Palas Kohistan
54	Mr. Muhammad Azam	SDEO (BS-17) Sedu Sharif Swat
55	Mr. Ghulam Sarwar	SDEO (BS-17) Balambat Dir Lower
56	Mr. Ghulam Habib	SDEO (BS-17) Dir Lower
57	Syed Atta Ullah Shah	Assistant Director (BS-17), Directorate of E&SE.
58	Mr. Raees Khan	SDEO (BS-17) Matta Swat
59	Mr. Love Dan	SDEO (BS-17) Sheringal Dir Upper
<b>CONSEQUENTIAL TRANSFER</b>		
<b>S.No</b>	<b>Name of candidate</b>	<b>Posted as</b>
60	Mr. Muhammad Arif, SS (Economics) BS-17 working as SDEO (M) Town-IV	SS (Economics) BS-17 GHSS Nizampur, Nowshera
61	Mr. Ghazi Bacha SS (Maths) BS-17 working as SDEO (M), Lahore Swabi	SS (Maths) BS-17 GHSS Kabgani, Swabi
62	Mr. Wisal Muhammad HM BS-17 working as SDEO (M) Katlang Mardan	HM BS-17 GHS Sohbat Abad, Mardan
63	Mr. Abdul Haleem SS (Islamiat) BS-17 working as SDEO (M) Mardan	SS (Islamiat) BS-17 GHSS Gujar Garhi, Mardan
64	Syed Arshad Hussain Shah SS (English) BS-17 working as SDEO (M) Takht Bhai, Mardan	Instructor (BS-17) RITE (Male) Mardan
65	Mr. Fazle Khaliq SS (English) BS-17 working as SDEO (M) Saidu Sharif, Swat	SS (English) BS-17 GHSS Miandam, Swat
66	Mr. Inyat Ullah HM BS-17 working as SDEO (M) Matta Swat	HM BS-17 GHS Sambat Swat
67	Mr. Inyat Ullah HM BS-17 working as SDEO (M) Charbagh Swat	HM BS-17 GHS Manpatai Swat
68	Mr. Liaqat Ali HM BS-17 working as SDEO (M) Khawaza Khela Swat	HM BS-17 GHS Laikot Swat
69	Mr. Majeed Ullah HM BS-17 working as SDEO (M) Kabal Swat	HM BS-17 GHS Ghalooch Swat
70	Mr. Muhammad Zahid SS (Statistics) BS-17 working as SDEO (M) Puran Shangla	SS (Statistics) BS-17 GHSS Butyal Shangla

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

71	Mr. Muhammad Pervez DPE BS-17 working as SDEO (M) Shangla	DPE BS-17 GHSS Olandar Shangla
72	Mr. Akhtar Naeem SS (Urdu) BS-17 working as SDEO (M) Basham, Shangla	SS (Urdu) BS-17 GHSS Shahpur Shangla
73	Mr. Rehman Ul Mulk SS (Pak-Study) BS-17 working as SDEO (M) Lal Qilla, Dir Lower	SS (Pak-Study) BS-17 GHSS Akhagaram Dir Upper
74	Mr. Sadiq Jan SS (Urdu) BS-17 working as SDEO (M) Balambat Dir Lower	SS (Urdu) BS-17 GHSS Pachakalay Dir Upper
75	Mr. Hameed Ur Rehman HM BS-17 working as SDEO (M) Samar Bagh Dir Lower	HM BS-17 GHS Kumber Dir Lower
76	Mr. Raza Shah ADEO BS-16 working as SDEO (M) Munda Dir Lower	Services placed at the disposal of Directorate E&SE KPK
77	Mr. Muhammad Zafar HM BS-17 working as SDEO (M) Temergrah Dir	HM BS-17 GHS Badin Dir Lower
78	Mr. Mehboob Ur Rab SST BS-16 working as SDEO (M) Sheringal Dir Upper	Services placed at the disposal of DEO (M) Dir Upper
79	Mr. Habib Ullah, HM BS-17 working as SDEO (M) Laachi Kohat	HM BS-17 GHS Pakka Topi, Kohat
80	Mr. Muhammad Naeem Shah HM BS-17 working as SDEO (M) Tall Hangu	HM BS-17 GHS Sarozai Hangu
81	Mr. Tariq Javed SS (Chemistry) BS-17 working as SDEO (M) D.I. Khan	SS (Chemistry) BS-17 GHSS Darban Kalan, D.I. Khan
82	Mr. Mirza Khan SS (English) BS-17 working as SDEO (M) Phar Pur D.I. Khan	SS (English) BS-17 GHSS Abdul Kkhel D.I. Khan
83	Mr. Zain Ullah Khan SS (Chemistry) BS-17 working as SDEO (M) Prova D.I. Khan	SS (Chemistry) BS-17 GHSS No.2 D.I. Khan
84	Mr. Muhammad Khalid HM BS-17 working as SDEO (M) Kulachi D.I. Khan	HM BS-17 GHS Budd D.I. Khan
85	Mr. Saif Ul Malook HM BS-17 working as SDEO (M) Palas Kohistan	HM BS-17 GHS Shore Kot Kohistan
86	Mr. Muhammad Nawab SST BS-16 working as SDEO (M) Pattan, Kohistan	Services placed at disposal of DEO (M) Kohistan

*J. Khan*

06 Races-Ur-Ker...



(8)

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

	Mr. Fazal Qayum SS (Pashto) BS-17 working as SDEO (M) Kohistan	SS (Pashto) BS-17 GHSS Sakhara, Swat
	Mr. Abdur Rauf SS (Urdu) BS-17 working as SDEO (M) Khudo Khail, Buner	SS(Urdu) BS-17 GHSS Nogram, Buner
	Mr. Ikhtiyar Ahmed SS (English) BS-17 working as SDEO (M) Mandan Buner	SS (English) BS-17 GHSS Agarai, Buner
90	Mr. Bakht Sher Hussain HM BS-17 working as SDEO (M) Gagara Buner	HM BS-17 GHS Rega Buner
91	Mr. Ayub Khan HM BS-17 working as SDEO (M) Dagar Buner	HM BS-17 GHS Anar Baig Mardan
92	Mr. Mir Samad ASDEO BS-16 working as SDEO (M) Batagaram	Services placed at disposal of Directorate of E&SE KPK
93	Mr. Sherferoz SST BS-16 working as SDEO (M) Alai Batagaram	Services placed at the disposal of DEO(M) Batagaram
94	Mr. Shabir Ahmed HM BS-17 working as SDEO (M) Baffa Mansehra,	HM BS-17 GHS Darband (New) Mansehra
95	Mr. Abid Hussain, HM BS-17 working as SDEO (M) Ghazi Haripur	HM BS-17 GHS Chintari Haripur
96	Mr. Aman Ullah HM BS-17 working as SDEO (M) Bannu	HM BS-17 GHS Bilawar Khan Bannu
97	Mr. Akhtar Zaman HM BS-17 working as SDEO (M) Lakki Marwat	HM BS-17 GHS Shukrullah Hussain, Bannu
98	Mr. Muhammad Shafiq HM BS-17 working as SDEO (M) Sarai Naurang, Lakki Marwat	HM BS-17 GHS Nowar Khel Lakki Marwat
99	Mr. Raja Sheraz Ahmed HM BS-17 working as SDEO (M) Torghar	HM BS-17 GHS Judba Torghar
100	Mr. Sanaullah SS (Maths) BS-17 working as assistant Director	SS (Maths) BS-17 GHSS No.1 Peshawar City
101	Mr. Iqbal Hussain SS (Pashtu) BS-17 working as Assistant Director	SS (Pashto) BS-17GHSS No.1 Peshawar City
102	Mr. Abdul Qayyum ADEO BS-16 working as Assistant Director Directorate of E&SE	Services placed at disposal of Director E&SE KPK for further posting

*J. Khan*

(9)

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

	Mr. Hameed Ur Rehman ADEO BS-16 working as Assistant Director, Directorate of E&SE	Services placed at disposal of Directorate E&SE KPK for further posting
	Mr. Aziz Ul Haq SS (Maths) BS-17 working as Assistant Director, Directorate of E&SE KPK	SS (Maths) BS-17 GHSS Manga Mardan
105	Mr. Hamood Ur Rehman ADEO BS-16 working as Assistant Director BS-17, Directorate of E&SE KPK	Services placed at disposal of Directorate E&SE KPK for further posting.
106	Mr. Azim Khan ADEO BS-16 working as Assistant Director BS-17 Directorate of E&SE KPK	Services placed at disposal of Directorate E&SE KPK for further posting.
107	Mr. Muhammad Ilyas, SDEO BS-17 working as AD BS-17 at Directorate of E&SE.	SDEO BS-17 Lachi Kohat
108	Mr. Abdur Rehman, SDEO BS-17 Topi Swabi	Services placed at disposal of Directorate E&SE KPK for further posting.
109	Mr. Shahid Lodan, SDEO (BS-17) Wari Dir Upper	Services placed at disposal of Directorate E&SE KPK for further posting.
110	Mr. Amin Zada, SS (BS-17) GHS Akhwagram Dir Upper	SDEO (BS-17) Wari Dir Upper

2. No TA/DA is allowed.

**SECRETARY**

Endst: of even No. & Date

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar
3. District Education Officers (Male), Concerned.
4. District Account Officers, Concerned.
5. PS to Chief Secretary, Khyber Pakhtunkhwa.
6. PS to Advisor to CM for E&SE Department.
7. PS to Secretary E&SE Department.
8. PA to Additional Secretary (Estab), E&SE Department.
9. PA to Deputy Secretary (Admn), E&SE Department.
10. In-charge EMIS E&SE Department with the request to upload it on the website of the Department i.e. [www.kpese.gov.pk](http://www.kpese.gov.pk)
11. SDEOs Concerned.
12. Master file.

*(Signature)*  
(ANWAR AKBAR KHAN) 20/11/18  
SECTION OFFICER (SCHOOLS MALE)

06 Raees-Ur-Rehman ASSISTANT



(10)

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

Dated Peshawar the October 29, 2018.

**NOTIFICATION**

**NO.SO(SME&SED/3-2/2013/Recruitment of SDEOs (Male) BS-17 (MC):**

Consequent upon their appointment as Sub-Divisional Educational Officers Male (BS-17) vide Notification of even number dated 05.09.2018 and following their arrival for duty (as mentioned against their names), the following SDEOs are hereby posted/adjusted on the posts & stations as mentioned against each:

S#	Name of candidate	Arrival Date	Posted as
1.	Mr. Malak Khan	06.09.2018	SDEO (BS-17) Tank
2.	Mr. Amir Ur Rehman	-do-	SDEO (BS-17) Mansehra
3.	Mr. Dilawar Khan	-do-	SDEO (BS-17) Kalkot Dir Upper
4.	Mr. Shahid Hussain	-do-	SDEO (BS-17) Mastuj Booni Chitral
5.	Mr. Maroof Khan	24.09.2018	SDEO (BS-17) Puran Shangla
6.	Mr. Gul Muhammad	25.09.2018	SDEO (BS-17) Khwaza Khela Swat
7.	Mr. Muqadas Khan	06.09.2018	SDEO (BS-17) Torkhow Murkhow Chitral
8.	Mr. Luqman Hakim	-do-	SDEO (BS-17) Takht-e-Nasrati Karak
9.	Mr. Naseer Ahmed	10.09.2018	SDEO (BS-17) Shangla
10.	Mr. Abdul Hameed	06.09.2018	SDEO (BS-17) Topi Swabi
11.	Mr. Sheeraz Hayat	-do-	Assistant Director (BS-17), Directorate of E&SE
12.	Mr. Kiramat Shah	-do-	SDEO (BS-17) Dargai Malakand

2. No TA/DA is allowed.

Endst: of even No. & Date:

**SECRETARY**

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar
2. District Education Officers (Male), Concerned.
3. District Account Officers, Concerned.

05	Abdul Qayyum	Directorate of E&SE	No correct sanction
06	Raees-Ur-Rehman	Assistant Director at	No correct sanction



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

4. PS to Emer Secretary, Khyber Pakhtunkhwa.
5. PS to Advisor to CM for E&SE Department.
6. PS to Secretary E&SE Department.
7. PA to Additional Secretary (Estab), E&SE Department.
8. PA to Deputy Secretary (Admn), E&SE Department.
9. In-charge EMIS E&SE Department with the request to upload it on the website of the Department i.e. [www.kpese.gov.pk](http://www.kpese.gov.pk).
10. SDEOs Concerned.
11. Master file.

*Anwar Akbar Khan*  
9A/X/18

**(ANWAR AKBAR KHAN)  
SECTION OFFICER (SCHOOLS MALE)**



RS No-91

11

Directorate of Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

PH No. 091-9225338, 9225339.  
Fax 091-9225339



NOTIFICATION.

Repld/s  
6

In exercise of powers conferred under Sub Section (1) of Section-8 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No.XVIII of 1973), the Final Seniority List of ASDEOs/ADEOs Male (Management Cadre), BPS-16 of Elementary & Secondary Education Department is hereby notified for information of all concerned.

Director  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

3159-90

File No. 1/ADEO (M) Management Cadre Seniority List/2018

Dated Peshawar the 17/8/2018.

Copy forwarded to the:-

1. Director Curriculum & Teacher Education Khyber Pakhtunkhwa, Abbottabad.
2. Director Education FATA Khyber Pakhtunkhwa; Peshawar
3. Director ITE Khyber Pakhtunkhwa, Peshawar
4. All District Education Officers (M) in Khyber Pakhtunkhwa
5. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
6. P/A to Director: E&SE Department Khyber Pakhtunkhwa.
7. The Deputy Director( EMISE), E&SE Department, with the request to upload the request Seniority List of E&SE Department website ([www.kpese.gov.pk](http://www.kpese.gov.pk)).
8. Master File

Dy: Director (Estab)  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

16/8/18

19 (12)

**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA, PESHAWAR.**  
**FINAL SENIORITY LIST OF ALL REGULAR MANAGEMENT CADRE MALE IN ELEMENTARY**  
**& SECONDARY EDUCATION KHYBER PAKHTUNKHWA, CORRECTED UPTO 15-08-2010**

S.#	Name & Designation	Father's name	Qualification	Place of posting	Year of passing B. Ed	Date of birth	Domestic	Date of 1 <sup>st</sup> Appnt in Education Department	Date of Appnt on ADLO post	Remarks
1	Ghulam Habib	Muhammad Wali	M.Sc B.Ed.M.Phil	DEO Shangla	1997	6.5.1967	M.Agency	12.7.1989	5.20.2011	
2	Mehboob Elahi	Rahmat Elahi	M.A M.Ed	DEO Jural	1999	3.15.1970	Chitral	4.10.1995	05.05.2011	
3	Muhammad Farooq	Gul Rehman		DEO Larak		2.3.1976	Karak	05.05.2011	05.05.2011	
4	Abdul Qayum Khan	Haji Lal Khan	M.Sc M.Ed	DEO Abbottabad	1998	4.8.1976	A.Abad	11.1.1995	05.05.2011	
5	Muhammad Zahid Khan	Sher Zaman	M.Sc M.Ed	DEO Nowshera	1998	11.22.1973	Nowshera	6.25.1997	05.05.2011	
6	Shamsul Islam Niaz	Niaz Muhammad	M.A B.Ed	DEO Charsadda	2000	1.1.1978	Charsadda	01.11.2010	05.05.2011	
7	Sharafat Khan	Muhamad Aslam Khan	M.A M.Ed	DEO Abbottabad	1997	5.10.1970	A.Abad	05.05.2011	05.05.2011	
8	Mahmood Iqbal	Khairati Khan	MBA M.Ed	DEO(M) D.F.Khan	2000	12.1.1967	D.F.Khan	1.17.1998	05.05.2011	
9	Muhammad Ishaq	Niaz Farid	M.A B.Ed	DEO Banna	1999	4.16.1976	F.R.Banna	1.31.2002	05.05.2011	
10	Muhammad Anwar	Hazrat Umar	M.A M.Ed	DEO Mardan	2002	3.1.1973	Mardan	6.24.1997	05.05.2011	
11	Zakeya Khan	Zakeya Khan	M.Sc M.Ed	DEO Peshawar	1999	3.19.1970	Peshawar	5.28.1994	05.05.2011	
12	Shams Ur Rehman	Malik ur Rehman	M.A B.Ed	DEO Manshera	1999	11.15.1974	Manshera	1.01.1999	05.05.2011	
13	iftikhar Ahmad	Mumtaz ahmad	M.A M.Ed	DEO Haripur	1999	12.25.1969	A.Abad	5.8.1993	05.05.2011	
14	Ghulam Sarwar	Ghulam yahya	M.A M.Phil	DEO MKD	1996	5.21.1972	MKD	2.11.1993	05.05.2011	
15	Muhammad Zubair	Sabz Ali Shah	M.A B.Ed	DEO Charsadda	2001	7.19.1972	Charsadda	1.23.1998	05.05.2011	
16	Fozil Khudo	Waris Khan	M.A M.Ed	DEO Mardan	2002	1.6.1976	Mardan	3.24.2004	05.05.2011	
17	Muhammad Rehman Shah	Gul Rehman Shah	M.A M.Ed	DEO Banna	2002	2.23.1976	Banna	07.05.2011	05.05.2011	
18	Muhammad Sohail Khan	Mir Jafar Khan	M.A M.Ed	DEO Nowshera		3.22.1971	Nowshera	10.31.1996	05.05.2011	
19	Muhammad Nabeem	Hasnui Maab	M.A B.Ed	DEO Swan	2001	4.10.1975	Swan	05.05.2011	05.05.2011	
		Hadi Khan		DEO Jural	1999	1.5.1967	Jural	01.10.1995	05.05.2011	
		Muhammad Hamid		DEO Jural	1999	1.21.1984	Jural	05.05.2011	05.05.2011	

Sr. No.	Name & Designation	Father's name	Qualification	Place of posting	Year of passing B. Ed	Date of Birth	Dor icile	Date of Ist. Apptt. in Education Department	Date of Apptt. on ADO post
22	Muhammad Islam	Fatihul Mulk Khan	M.A M.Ed	DEO Dir(L)	2003	4.10.1973	Dir	12.20.1994	05.05.2011
23	Dil Nawaz Khan	Dashat Mir	M.Sc M.Ed	DEO Karak	2003	1.3.1977	Karak	8.1.2006	05.05.2011
24	Fida Muhammad	Firdous Khan	M.A M.Ed	P.O E&SE	2001	4.15.1977	Swabi	4.20.1999	05.05.2011
25	Muhammad Aftab	Masal Khan	M.S (Edu)	DEO Nowshera	2004	4.14.1978	Nowshera	6.23.1997	05.05.2011
26	Hayat Khan	Nazeef Khan	M.Sc.M.Ed	DEO Peshawar	2004	2.15.1979	Charsada	5.17.2011	5.23.2011
27	Muhammad Ajmal	Jamalud Din	M.A M.A Edu	DEO Mansehra	1999	1.2.1969	Mansehra	2.28.1993	05.05.2011
28	Salih Muhammad	Shad Muhammad	M.A M.Ed	DEO Nowshera	1995	1.1.1967	Swabi	12.9.1989	05.05.2011
29	Waheed Ullah Shah	Mazhar Ali Shah	M.A B.Ed	DEO Bannu	1994	1.16.1968	Bannu	3.31.1992	05.05.2011
30	Khalid Naseem	Malik Muhammad Amir	M.Sc B.Ed	DEO DI Khan	2002	2.28.1976	DI Khan	4.21.1999	05.05.2011
31	Gul Faraz	Shahid Khan	M.A M.Ed	DEO Karak	1999	3.5.1970	Karak	10.8.1990	05.05.2011
32	Abudur Fehman Rashid	Inayat Ullah Jan	M.Sc M.Ed	DEO Laki Marwat	1993	1.11.1971	L.Marwat	8.3.1999	05.05.2011
33	Abdul Wahab	Abdul Ghafoor	M.A M.Ed	DEO Swabi	1998	3.6.1971	Swabi	12.31.1993	05.05.2011
34	Imtiaz Khan	Faj Barin	M.Phil B.Ed	DEO Nowshera	1996	2.8.1973	Nowshera	5.30.1995	05.05.2011
35	Hameed Ullah	Khan Zaman	M.A B.Ed	DEO L.Marwat	2003	4.12.1974	L.Marwat	9.1.2004	05.05.2011
36	Muhammad Abid	Fazli Khaliq	M.A M.Ed	DEO Swabi	2002	11.1.1974	Swabi	4.24.1998	05.05.2011
37	Muhammad Azam	Badashah Islam	M.Sc M.Ed	DEO Swat	2001	12.27.1974	MKD	05.05.2011	5.10.2011
38	Muhammad Azam	Johar Gul	M.A M.Ed	DEO Khoistan	2000	9.6.1976	Khy: Agency:	9.21.1998	5.23.2011
39	Muhammad Azam	Ghani Muhammad	M.Sc M.Ed	DEO Mardan	2004	4.3.1979	Swabi	5.7.2011	05.05.2011
40	Muhammad Azam	Ullah Khan	M.S M.Ed	Assistant Director	2004	4.15.1979	Peshawar	05.05.2011	05.05.2011
41	Muhammad Azam	Arvin Jan	M.A B.Ed	DEO Dir(L)	1997	4.2.1972	Baj Agency	4.19.1995	5.10.2011
42	Muhammad Azam	Tamash Gul		DEO Mardan		4.15.1973	Mardan	05.05.2011	05.05.2011
43	Muhammad Azam	Salam Gul	M.A M.Ed	DEO Karak	2005	2.2.1975	Karak	10.12.1995	05.05.2011
44	Muhammad Azam	Muhammad Yousaf	M.A M.Ed	DEO Swabi	1997	3.5.1971	Swabi	9.21.1997	05.05.2011
45	Muhammad Azam								

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	Name & Designation	Father's name	Qualification	Place of posting	Year of promotion	Date of birth	Domicile	Date of Issr. in Education Department	Date of Appoin. on A.D.O. post	
46	Shafiq Ur Rehman	Abdur Rehman	M.A M.Phil (Eda)	DEO Manshra	1998	1.12.1973	Manshra	1.31.1995	05.05.2011	14
47	Ahmad Ullah	Nasrullah	MA.M.Ed	DEO Charsadda	2000	8.17.1974	Charsada	7.13.1997	05.05.2011	
48	Races Ur Rehman	Noor Ur Rehman	M.A M.Ed	DEO Manshra	1993	2.15.1966	Manshra	3.15.1986	05.05.2011	
49	Muhammad Zarif	Nawaz Ali	M.Sc M.Ed	DEO DI Khan	1994	7.25.1969	DI Khan	5.26.1997	05.05.2011	
50	Muhammad Tariq	Noor Ali Khan	M.A M.Phil	DEO Bannu	1998	3.28.1971	Bannu	5.5.1999	05.05.2011	
51	Hamid Rasool	Abdur Rasool	M.A M.Ed		1997	6.2.1974	Bannu	9.1.2006	05.05.2011	
52	Qadir Shah	Sahib Khan	M.A M.Ed	DEO L.Marwat	2000	1.3.1976	L.Marwat	5.10.2005	5.10.2011	
53	Muhammad Arshad	Wadoof Ur Rehman	M.A B.Ed	DEO Charsadda	2000	22.01.1974	Peshawar	8.16.1997	5.10.2011	
54	Ishad Khan	Khushal Khan	M.A M.Ed	PITE	2003	3.14.1974	Peshawar	5.15.1999	05.05.2011	
55	Syed Atta Ullah Shah	Syed Muzarab Shah	M.Sc M.Ed	Assistant Director	2001	2.1.1976	Mohd Ay:	05.05.2011	5.10.2011	
56	Shahzad Nadeem	Khurshheed Ahmad	M.A M.Ed	DEO Chitral	2002	2.1.1977	Chitral	05.05.2011	05.05.2011	
57	Habib Ur Rehman	Bedashah Khan	M.A M.Ed	DEO L.Marwat	1993	9.5.1964	L.Marwat	12.16.1990	05.05.2011	
58	Abdul Samad	Muhammad Miskeen	M.A M.Ed	DEO Haripur	1998	1.1.1970	Manshra	12.19.1990	5.10.2011	
59	Chanzeb	Zardad Khan		DEO Abbottabad		5.25.1972	Abbott Abad	05.05.2011	05.05.2011	
60	Raja Bahu Jahangir	Raja Sultan Mubarak	M.A B.Ed	DEO Manshra	1999	4.1.1975	Manshra	05.05.2011	05.05.2011	
61	Qaisar Khan	Muhammad Nawaz Khan	M.A M.Ed	DEO Karak	2000	4.16.1974	Dir, Bannu	4.20.1999	5.10.2011	
62	Sharaf Uddin	Gul Nadar Khan	M.A B.Ed	DEO Chitral	1994	2.20.1968	Chitral	3.1.1991	05.05.2011	
63	Intiaz Khan	Gul Zaman Khan	M.A M.Ed	DEO Dir(L)	1992	4.8.1968	Dir	5.16.1987	05.05.2011	
64	Muhammad Khitab	Gulab	M.A M.Ed	DEO Dir(L)	1994	1.1.1969	Dir	12.10.1990	05.05.2011	
65	Bakht Zada	Mahan Gul	M.A M.Ed	DEO Dir(L)	1995	4.10.1970	Dir	4.25.1992	05.05.2011	
66	Zia ur Rehman	Sajid Rehman	M.A M.Ed	DEO Peshawar	1996	7.15.1972	Peshawar	1.1.1994	05.05.2011	
67	Iftisham ul Haq	Fazal Haq	M.Phil(Eda)	DEO MKD	2000	1.1.1973	MKD	05.04.1999	05.05.2011	
68	Muhammad Saleem	Gibran Sarwar	M.A M.Ed	DEO DI Khan	1993	1.10.1976	DI Khan	12.31.1997	05.05.2011	



No	Name & Designation	Father's name	Qualification	Place of posting	Year of passing B.Ed	Date of birth	Domicile	Date of Ist. Appnt. in Education Department	Date of Appnt. on ADEO post	Remarks
										16
94	Sikandar Hayat	Sadiq ullah	M.A.M.Ed	DEO Swabi	1992	11.20.1973	Swabi	9.1.1992	05.05.2011	
95	Muhammad Noor Sultan	Dilawar Khan	M.A.M.Ed	DEO DI Khan	2000	2.22.1976	DI Khan	4.21.1999	05.05.2011	
96	Wisal Muhammad	Dost Muhammad	M.Sc.M.Ed	DEO Charsadda	2004	8.11.1979	Charsada	5.10.2011	5.10.2011	
97	Nisar Ahmad	Painda Gul	M.A.M.Ed	DEO Mardan	1994	4.1.1964	Baj Agy	10.15.1992	5.10.2011	
98	Muhammad Iqbal	Baz Mulla	M.A.M.Ed	DEO Dir	1993	11.20.1964	Dir	05.05.2011	05.05.2011	
99	Zahcerud Din	Muhammad Saeed	M.Sc.M.Ed	DEO Dir(L)	1993	3.2.1965	Dir	7.12.1999	05.05.2011	
100	Habib Ullah	Muhammad Aslam	M.A.B.Ed	DEO Tank	1996	2.2.1974	Tank	4.1.1993	05.05.2011	
101	Hafiz Fazl e Akber	Gohar	M.A.M.Ed	DEO Swabi	2002	4.5.1978	Swabi	1.21.1997	05.05.2011	
102	Mir Samad Khan	Hakeem Khan	M.A.M.Ed	DEO Battagram	2002	5.12.1971	Batgram	11.22.1999	05.05.2011	
103	Muhammad Ishtiaq	Muhammad Latif	M.A.M.Ed	DEO Peshwar	2004	9.29.1975	Peshawar	5.6.1996	05.05.2011	
104	Muhammad Nacem	Mumtaz Khan		DEO Karak		5.25.1976	Karak	05.05.2011	05.05.2011	
105	Syed Anwar Ali Shah	Syed Mehmood Shah	M.A.M.Ed	DEO Charsadda	2002	11.20.1971	Mohd Agy	5.13.2011	5.23.2011	
106	Muhammad Sharif	Sher Khan	M.A.M.Ed	DEO Hangu	1998	3.1.1970	Kuram	12.3.1994	5.10.2011	
107	Abdul Qayum Khan	Abdul Hanan	M.Sc.B.Ed	Assistant Director	2000	3.16.1971	Bannu	11.7.2005	5.23.2011	
108	Ihsan ullah	Anar sher	M.A.M.Ed	DEO Manshra	1997	8.14.1971	Mohd Agy	1.17.1995	5.10.2011	
109	Habib Ullah	Muhammad Iqbal		DEO Peshawar		12.10.1973	Peshawar	05.05.2011	05.05.2011	
110	Muhammad Hayat Khan	Masal Khan	M.S (Edu)	DEO Nowshera	2000	4.14.1975	Nowshera	6.23.1997	05.05.2011	
111	Sultan Muhammad Khan	Ali Akber	M.A.M.Ed	DEO Mardan	2004	4.1.1978	Mardan	4.29.1999	05.05.2011	
112	Muhammad Ishtiaq	Muhammad	M.A.M.Ed	DEO MKD	2001	6.23.1978	MRD	10.27.1994	05.05.2011	
113	Fayaz uddin	Jehan Badushah	M.A.M.Ed	DEO Dir (U)	2004	3.14.1979	Dir	05.05.2011	05.05.2011	
114	Muhammad Hussain	Mir Abbas Khan	M.A.B.Ed	DEO Karak	1996	4.14.1973	Karak	05.05.2011	05.05.2011	
115	Muhammad Asif Khan	Muhammad Akram Khan	M.A.M.Ed	DEO Abbottabad	1996	10.5.1964	Abbott Abad	05.05.2011	05.05.2011	
116	Atta Ullah Shah	Ulhojd Shah	M.A (Edu)	DEO Swabi	1991	3.6.1965	Swabi	9.4.1986	05.05.2011	
117	Said Zaman Shah	Yeghan Shah	M.A (Edu)	DEO Swabi	1997	8.1.1977	MRD	10.11.1996	07.05.2011	

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S. No	Name & Designation	Father's name	Qualification	Place of posting	Year of passing B. Ed	Date of Birth	From	Date of last Appointment	Date of last promotion
118	Umar Farooq	Bahramand	M.A B.Ed	DEO Buner	1994	3.18.1966	Buna	2.8.1990	05.05.2011
119	Syed Ihsan ullah Shah	Syed Lal Badashah	M.A M.Phil	DEO Peshawar	1996	5.1.1966	Peshawar	11.10.1994	05.05.2011
120	Imtiaz Ali	Haji Hayat Gul	M.Sc B.Ed	Assistant Director		10.12.1966	Peshawar	05.05.2011	05.05.2011
121	Iftikhar Ali Khan	Zarif Khan	M.A M.Ed	DEO Mardan	1996	3.4.1968	Mardan	3.3.1992	05.05.2011
122	Pir Muhammad Khan	Nadir Khan	M.A M.Ed	DEO Dir (U)	1996	5.9.1968	Dir	5.19.1987	05.05.2011
123	Sakin Shah	Muhib Ali Shah	M.A M.Ed	GHS Umar	1998	10.4.1969	Peshawar	3.17.1992	05.05.2011
124	Iran Gul	Nascer Khan	M.Sc M.Ed	DEO Tank	1997	4.2.1970	Tank	4.6.1999	05.05.2011
125	Mushtaq Ahmad	Gulzar Ahmad		DEO Kohat		12.20.1970	Peshawar	05.05.2011	05.05.2011
126	Inam ullah	Taj Muhammad	M.A M.Ed	DEO Peshawar	1998	1.21.1971	Peshawar	4.19.1994	05.05.2011
127	Tahir Ahmad	Rab Nawaz Khan	M.Sc M.Ed	DEO L.Marwat	1999	1.4.1974	L.Mrwat	2.21.1998	05.05.2011
128	Zahir Qamar	Shamul qamar	M.Sc B.Ed	DEO Mardan	1999	2.3.1975	Peshawar	05.05.2011	05.05.2011
129	Ajeeb ullah	Saif ullah	M.A M.Ed	DEO Dir (U)	2000	11.16.1976	Dir	05.05.2011	05.05.2011
130	Wali ur Rehman	Fojun Khan	M.A M.Ed	DEO Battagram	2000	1.4.1977	Batgram	05.05.2011	05.05.2011
131	S.Irshad Ali	Ali Afsar	M.A M.Ed	DEO Abbottabad	2000	5.9.1977	A.Abad	4.11.1996	05.05.2011
132	Said Badashah	Ali Ahmad	M.A M.Ed	DEO Haripur	1991	3.1.1965	Swat	11.26.1986	05.05.2011
133	Hafiz Muhammad Zia Ullah	Ajab gul	M.A M.Ed	DEO Kohat	1995	1.1.1967	Kohat	12.4.1985	05.05.2011
134	Abdul Halim	Yamin	M.A M.Ed	DEO Shangla	1998	4.6.1968	Shangla	11.10.1994	05.05.2011
135	Syed Anwar Shah	Syed Mardan shah	M.A M.Phil	DEO Manshra	1995	3.19.1969	Manshra	3.26.1990	05.05.2011
136	Rooh Ullah Jan	Mishbahuddin	M.A M.Ed	DEO Mardan	1995	1.5.1970	Mardan	3.24.1992	05.05.2011
137	Asmat ulla	Atta Muhammad	M.A M.Ed	DEO DI Khan	1994	9.1.1970	DI Khan	11.19.1992	05.05.2011
138	Nasrumin ullah	Khan ullah	M.A M.Ed	GHS Amangar	1994	12.12.1970	Nowshera	12.10.1990	05.05.2011
139	Abdullah Khan	Zargohan shah	M.A M.Ed	DEO Karak	1994	2.12.1971	Karak	11.19.1994	05.05.2011
140	Arshad Me'mood	Ghulam Nabi	M.A M.Ed	DEO Haripur	1997	12.24.1971	A.Abad	3.10.1993	05.05.2011
141	Muhammad Farooq	Muhammad Farooq	M.A M.Ed	DEO					05.05.2011

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Sl. No.	Name & Designation	Father's name	Qualification	Institution	Year	Birth	District	Date of Ist. Appnt. in	Date of Appnt. on A.D. O post	Remarks
142	Wazir Zada	Sahib zada	M.A.M.Ed	DEO	1998	11.1972	Mardan	05.05.2011	05.05.2011	
143	Munibur Rehman	Abdu. ghafoor	M.A.M.Ed	DEO	1998	9.10.1973	Abbot Abad	3.23.1992	05.05.2011	
144	Sajjad Rasheed	Abdu. Rasheed	M.A.M.Ed	DEO	1998	8.8.1970	Peshawar	5.7.1996	5.19.2011	
145	Noor Ajab khan	Noor Muhammad khan	M.A.B.Ed	DEO	1998	6.4.1972	Karak	05.05.2011	05.05.2011	
146	Bismillah Jan	Abdu. ghafar	M.Sc.M.Ed	DEO	2000	4.27.1974	Peshawar	7.1.1997	05.05.2011	
147	Muhammad Sadiq	Muhammad kamal	MSc.M.Ed	DEO	2002	4.6.1974	Mardan	7.16.1997	05.05.2011	
148	Hashim Khan	Muhammad Nawaz Khan	M.A.B.Ed	DEO	2001	1.15.1975	I. Marwat	5.10.2011	5.10.2011	
149	Muhammad Ishfaq Elahi	Farman Elahi		DEO	2001	11.10.1976	Peshawar	05.05.2011	5.23.2011	
150	Sajjad Ahmad	Qazi Izzat Hanan	M.Sc.M.Ed	DEO	2001	4.3.1977	Charsada	3.10.2007	5.10.2011	
	Muhammad Rehman	Hastam khan	M.A.M.Ed	DEO	1998	4.14.1966	Peshawar	10.17.1988	05.05.2011	
	Muhammad Din	Fazal Mabood Jan	M.A.M.Ed	DEO	1998	24.11.1967	Dir	8.29.1994	05.05.2011	
	Muhammad Khan	Mian said	M.A.M.Ed	DEO	2004	6/24/1905	MKD	15.02.1990	05.05.2011	
	Muhammad Khan	Mir Rehman	M.A.M.Ed	DEO	1998	2.1.1969	Mohd Agy:	12.7.1989	5.33.2011	
	Muhammad Shah	Said Ali Shah	M.A.M.Ed	DEO	1999	3.25.1969	Bunir	5.31.1994	05.05.2011	
	Muhammad Tahir	Sawal Faqir	M.A.M.Ed	DEO	1998	8.18.1969	Dir	16.08.1887	5.13.2011	
157	S.Sakhawat Ali shah	S.Chirgah shah	M.A.B.Ed	DEO Peshawar	1998	5.15.1970	Peshawar	10.16.1988	05.05.2011	
158	Nasrullah khan	Nadar khan	M.A.B.Ed	DEO Dir	2000	1.1.1971	Dir	05.05.2011	05.05.2011	
159	Janas khan	Lal Bahim	MSc.M.Ed	DEO Charsada	2001	2.2.1971	Charsada	1.14.1998	05.05.2011	
160	Zahir ur Rehman	Mir Fossair	M.Sc.M.Ed	DEO Hangu	2000	2.6.1973	Hangu	12.16.1999	05.05.2011	
161	Noor Muhammad	Said Muhammad	M.A.B.Ed	DEO Dir	2000	1.2.1975	Baj Agy:	05.05.2011	5.10.2011	
162	Muhammad Khan	Ismael Khan	MSc.B.Ed	DEO Mardan	1999	3.7.1972	Mardan	4.11.1996	05.05.2011	
163	Shafiq ur Rehman	Zia U Haq	M.B.A.M.Ed	DEO Abbot Abad	2002	5.25.1972	Abbot Abad	05.05.2011	05.05.2011	
164	Muhammad Hussain	Hussain Gul	M.A.B.Ed	DEO Mardan	2001	2.16.1973	MKD	23.04.1998	05.05.2011	
165	Muhammad Hussain	Abdul kadir	M.A.B.Ed	DEO Mardan	2001	2.22.1973	MKD	3.25.1997	05.05.2011	

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16/8/18



Name & Designation	Father's name	Qualification	Place of posting	Year of passing B. Ed	Date of birth	Domicile	Date of 1st Appnt. in Education Department	Date of Appnt. on A.D.E.O post
166 Zahir Shah Khan	Sardar Khan	M.Sc.M.Ed	DEO Peshawar	2000	4.3.1973	Peshawar	9.25.1993	05.05.2011
167 Sajid Ullah	Zahir Shah	M.Sc M.Ed	DEO Charsadda	1999	4.30.1974	Mahd Agy	1.1.2001	5.10.2011
168 Said Zahid	Faiz Mehmood	M.A M.Ed	DEO Buner	2006	4.1.1975	Buner	6.20.1993	05.05.2011
169 Khalid Khan	Khan Bahdar				4.6.1975	Mardan	05.05.2011	05.05.2011
170 Kiramat ullah	Sattar Azman	M.A B.Ed	DEO Karak	1999	4.12.1975	FR.Bannu	05.05.2011	5.23.2011
171 Muhammad Aisar	Hassan Zeb	M.A M.Ed	DEO Swabi	2002	1.5.1976	Swabi	4.20.1999	05.05.2011
172 Harwood ur Rehman	Maqbool ur Rehman	MA.M.Ed	Assistant Director	2001	5.15.1977	Peshawar	05.05.2011	05.05.2011
173 Taj Alam	Sher Alam	M.Sc B.Ed	DEO DI Khan	2002	11.20.1977	FR.Bannu	5.23.2011	5.23.2011
174 Abdul Karim	Jehinger Khan	M.A M.Ed	DEO Peshawar	2003	6.16.1981	Peshawar	2.23.2007	5.10.2011
175 Miftah ud Din	Akber Khan	M.A M.Ed	DEO Chitral	1993	10.17.1961	Chitral	12.29.1984	05.05.2011
176 Abid Hussain	Hussain Ghulam	M.Sc B.Ed	DEO Kohat	1998	6.16.1968	Kurram	10.10.1995	05.05.2011
177 Ejaz Ahmad	Ghulam Mohi Ud Din	MA B.Ed	DEO (M) Peshawar		1.4.1970	Peshawar	05.05.2011	05.05.2011
178 Muhammad Ishtiaq	Muhammad Ayub	M.Phil (Edu)	DEO Mansehra	1994	2.15.1970	Mansehra	12.15.1990	05.05.2011
179 Muhammad Arif	Muhammad Junaid Khan	M.Sc M.Ed	DEO Swabi	1997	4.14.1971	Swabi	9.19.1995	05.05.2011
180 Zamir Ahmad Khan	Ahmad Nawaz Khan	M.Sc M.Ed	DEO DI Khan	1995	4.12.1973	DI Khan	2.13.1996	05.05.2011
181 Shakeel Ahmad	Muhammad Ahmad	M.Sc M.Ed	DEO DI Khan	2000	5.16.1973	DI Khan	1.14.1998	5.10.2011
182 Muhammad Saleem	Muhammad Azeem Khan	M.A M.Phil (Edu)		1996	1.6.1974	Peshawar	5.19.1994	05.05.2011
183 Zafar Khan	Munawar Khan		DEO Abbottabad		12.25.1974	Abbot Abad	05.05.2011	05.05.2011
184 Jehangir Khan	Shah Jehan	M.A M.Phil (Edu)	DEO Charsadda	1999	4.15.1975	Peshawar	2.19.1998	05.05.2011
185 Nisar Muhammad	Bahdar Khan	M.A M.Ed	DEO Peshawar	1999	11.19.1975	Marwat	5.15.2002	10.20.2011
186 Zafar Iqbal	Amir Badashah				12.10.1975	Peshawar	05.05.2011	05.05.2011
187 Muslem Fazal	Fazla Rehman	M.A M.Ed	DEO Abbottabad	1994	6.20.1967	Abbabad	10.1.1985	5.13.2011
188 Ullah Shah	Qader Shah	M.A.M.Ed	DEO Battagram	1995	9.1.1968	Mardan	12.1.1987	5.13.2011
					10.10.1974		05.05.2011	05.05.2011

19

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16/8/16

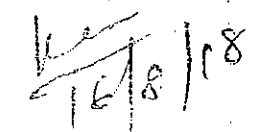
	Name & Designation	Father's name	Qualification	Place of posting	Year of passing B. Ed	Date of birth	Domicile	Date of Ist. Appnt. in Education Department	Date of Appnt. on A.D.O post	
190	Races Khan	Sher Zaman Khan	M.A M.Ed	DEO MKD	1997	08.05.1972	MKD	18.08.1993	05.05.2011	20
191	Shams ur Rehman	Hafiz Abdul hadi	M.A M.Ed	DEO Battagram	1994	3.13.1967	Hangu	23.1990	5.27.2011	
192	Syed Fazali Amin	Mir Hatim Shah	M.A M.Ed	DEO Charsadda	1997	3.11.1971	Charsada	01.04.1996	05.05.2011	
193	Sahib Kamal	Haji Fazal Zaman	M.A M.Phil (Edu)	DEO Nowshera	2000	5.11.1972	Nowshera	3.22.1992	5.23.2011	
194	Saeed Ahmad	H.Deber Khan	M.Sc M.Ed	DEO Shangla	2000	10.4.1972	Shangla	1998	05.05.2011	
195	Tariq Ahmad	Fazli Rashid	M.A M.Ed	DEO Shangla	2002	6.10.1973	Dir	5.1.1999	7.23.2011	
196	Muhammad Arshad Sharif	Sharif Khan	M.A M.Ed	DEO Kohat	2002	7.26.1973	Kohat	4.9.1999	5.13.2011	
197	Ulfat Ali Shah	Daftar Shah	M.A B.Ed	DEO DIKhan	1995	4.1.1974	SW Agy:	1.29.2002	5.13.2011	
198	Qasim Ali Khan	Mumtaz ali khan				1.1.1976	Peshawar	05.05.2011	05.05.2011	
199	Hidayat ullah	Khan Zada Pacha	M.Sc B.Ed	DEO Dir(L)	1996	6.15.1963	Dir	4.15.1993	05.05.2011	
200	Abdul Khaliq	Sultan Mehmood	M.A M.Ed	DEO Mardan	1996	4.2.1971	Mardan	12.22.1994	05.05.2011	16/8/18
201	Abdullah Khan	Sadin Khan	M.A M.Ed	DEO Hangu	1998	4.25.1970	Kurram	6.21.1992	5.10.2011	
202	Javid Iqbal	Ghulam Qadar	M.A M.Ed	DEO Mardan	1999	3.18.1973	Baj Agy	5.2.2011	5.12.2011	
203	Malik Khan	Shehzad Khan	M.A M.Ed	DEO Tank	1996	4.20.1973	SW Agy:	9.24.2003	05.05.2011	
204	Naveed Ahmad	Muhammad Farid Khan	M.A M.Ed	DEO Tank	2002	4.5.1974	Manshra	1.23.1996	05.05.2011	
205	Fazli Subhan	Fazli hanan	M.A M.Ed	DEO Manshra	1996	24.02.1965	MKD	15.02.1990	05.05.2011	
206	Sarfraz Khan	Shahab Ud Don	M.A M.Ed	DEO Manshra	1992	12.14.1967	-do-	10.11.1994	05.05.2011	
207	Shahab Ud Din	Fazal Manan		DEO Tank		3.12.1970	NW Agy:	05.05.2011	5.23.2011	
208	Sana ullah	Muhammad Sher Khan	M.A M.Phil (Edu)	DEO Tank	2000	3.8.1974	FR Rannu	10.6.1994	5.10.2011	
209	Nadeem	Abdul Qayyum	M.A M.Phil (Edu)	DEO Tank	2004	1.1.1974	Manshra	2.3.2007	05.05.2011	
210	Ghulam Jilani	Darvaish	M.A M.Ed	DEO Manshra	1998	10.29.1965	-do-	30.06.1985	05.05.2011	
211	Syed Mehmood ul Hassan	Syed Saayid Shah	M.A B.Ed	DEO Abbottabad		20.3.1970	Abbottabad	05.05.2011	05.05.2011	
212	Rah Nisvaz	Gul Dad Khan		DEO Abbottabad		4.15.1973	Abbottabad	05.05.2011	05.05.2011	
		Fazli Khan	M.A M.Ed	DEO Charsadda	2000	4.16.1974	Mohd Agy:	05.12.2011	5.12.2011	

	Name & Designation	Father's name	Qualification	Place of posting	Year of passing B. Ed	Date of birth	Domicile	Date of Ist. Apptt in Education Department	Date of Apptt in M.D.C. post	
214	Sange Faras	Malook	M.Sc M.Ed	DEO Charsadda	2001	4.12.1972	Mohd Agy:	2.3.2011	10.05.2011	(21)
215	Muhammad Hjaz	Mir sahib Khan	B.A M.Ed	DEO Tank	1999	9.10.1977	SW Agy:	9.12.2002	5.10.2011	
216	Aqil Wazir	Gul Nazeer	M.Sc B.Ed	DEO L.Marwat	2003	1.3.1980	FR. Laki	9.5.2002	5.10.2011	
217	Maroof Khan	Akhya Jan				4.7.1975	FR. Banna	05.05.2011	05.05.2011	

**CERTIFICATE:**

It is certified that the Seniority List is Final, Undisputed and not Subjudice in any court.

  
 Deputy Director (Estab.)  
 E&SE Khyber Pakhtunkhwa  
 PESHAWAR

  
 16/8/18



G  
KHYB

**ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT**

22

Dated Peshawar the February 28<sup>th</sup>, 2018

**NOTIFICATION**

**NO. SO(S/F)E&SED/4-16/2018/Placement Committee:** Consequent upon the recommendations of Placement Committee meeting held on 27-02-2018, posting/ transfer in respect of following Male/ Female officers from Management/ Teaching Cadre in the Elementary & Secondary Education Department are hereby ordered against the posts noted against each in the interest of public service with immediate effect:

S#	Name & Designation	Posted As	Remarks
1	Mr. Umer Zaman (BS-18) DDEO (M) Kohistan (Management Cadre)	DDEO (M) BS-18 Torghar	Vice Sr. No. 2
2	Mr. Zulfiqar Ul Mulk (BS-18) DDEO (M) Tor Ghar (Management Cadre)	DDEO (F) BS-18 Nowshera with additional charge of DEO (F) Nowshera	Muhammad Fayaz Khan (BS-19) DEO (M) Nowshera is hereby relieved from the additional charge of DEO (F) Nowshera
3	Muhammad Ishfaq Khan Jadoon (BS-18) Aids Officer at DCTE Abbottabad (Management Cadre)	DDEO (M) BS-18 Haripur	Vice Sr. No. 4
4	Mr. Hafiz Muhammad Nawaz (BS-18) DDEO (M) Haripur	Aids Officer (BS-18) at DCTE Abbottabad	Vice Sr. No. 3
5	Mr. Nisar (BS-17) SDEO (M) Karak (Management Cadre)	SDEO (M) BS-17 Banda Daud Shah Karak	Vice Sr. No. 6
6	Mr. Attiqur Rehman (BS-17) SDEO (M) BD Shah Karak	SDEO (M) BS-17 Takht-e-Nusrati Karak	A.V.P.
7	Mr. Muhammad Farooq (BS-16) ADEO (M) O/O DEO (M) Karak (Management Cadre)	SDEO (M) BS-17 Karak (in his own pay & scale)	Vice Sr. No. 5
8	Mr. Fazli Wahid, AD (BS-17) Directorate of E&SE (Management Cadre)	SDEO (M) BS-17 Razzar Swabi	Vice Sr. No. 9
9	Mr. Abdul Ghaffar (BS-17) SDEO (M) Razzar Swabi (Teaching Cadre)	SS (PS) BS-17 GHSS Kalu Khan Swabi	A.V.P.
10	Mr. Liaqat Ali (BS-17) SDEO (M) Shabqadar Charsadda (Management Cadre)	AD (BS-17) Directorate of E&SE	Vice Sr. No. 8
11	Muhammad Iqbal (BS-17) AD (Examination) PITE Peshawar (Teaching Cadre)	SDEO (M) BS-17 Shabqadar Charsadda	Vice Sr. No. 10
12	Mst. Ulfat Begum (BS-18) DDEO (F) Swabi with additional charge of DEO (F) Swabi (Management Cadre)	DDEO (F) BS-18 Charsadda with additional charge of DEO (F) Charsadda	Vice Sr. No. 13
13	Mst. Naghmana Sardar (BS-18) DDEO (F) Charsadda with additional charge of DEO (F) Charsadda (Management Cadre)	Services placed at the disposal of Directorate of E&SE.	Charge of DEO (Female) Swabi is assigned to DEO (M) Swabi with addition to his own duties.
14	Mst. Rukhsana Rahim (BS-17)	SDEO (F) BS-17 Topi Swabi	A.V.P.



GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Dated Peshawar the November 13, 2018.

**NOTIFICATION**

**NO.SO(SM)E&SED/2-1/2018/Posting/Transfer/2018:** The Competent Authority is pleased to order the posting/transfer of the following officers on the posts/stations as mentioned against their names in the public interest with immediate effect:

S.#	Name, Designation & Present Place of Posting	Transferred as	Remarks
1.	Mr. Ghaza Bacha, SS (Maths) BS-17 GHSS Kunda Swabi	SDEO (Male) Lahore Swabi	V.S#2
2.	Mr. Abdul Wahab, SDEO (Male) Lahore Swabi	Assistant Director at Directorate of E&SE	A.V.P
3.	Mr. Habib Ullah, HM (BS-17) Pakka Topi Kohat	SDEO (Male) Lachi Kohat	V.S#4
4.	Mr. Muhammad Ilyas, (BS-17) SDEO (Male) Lachi Kohat	Assistant Director at Directorate of E&SE	A.V.P
5.	Mr. Muhammad Humayun, (BS-17) SDEO (Male) Daraban D.I. Khan	SDEO (Male) Paharpur D.I. Khan	V.S#6
6.	Mr. Mehmood Iqbal, (BS-17) SDEO (Male) Paharpur D.I. Khan	SDEO (Male) Daraban D.I. Khan	V.S#5
7.	Mr. Shams ul Islam Niaz, (BS-17) SDEO (Male) Kabal Swat	Assistant Director at Directorate of E&SE	A.V.P
8.	Mr. Gul Muhammad, (BS-17) SDEO (Male) Khwaza Khela Swat	SDEO (Male) Kabal Swat	V.S#7
9.	Mr. Ghulam Sarwar, (BS-17) SDEO (Male) Balambat Dir.Lower	SDEO (Male) Khwaza Khela Swat	V.S#8
10.	Mr. Muhammad Pervez, (BS-17) DPE GHSS Olandar Shangla	SDEO (Male) Alpuri Shangla	A.V.P
11.	Mr. Akhtar Naeem, (BS-17) SS (Urdu) GHSS Shahpur-Shangla	SDEO (Male) Bisham Shangla	-do-
12.	Mr. Abdul Hameed, SDEO (BS-17) Topi Swabi	Assistant Director at Directorate of E&SE	-do-
13.	Mr. Farukh Said Khan, HM (BS-17) GHS Wanda Madad D.I. Khan	SDEO (Male) Bannu	-do-
14.	Mr. Inyat Ullah, HM (BS-17) GHS Manpatai Swat	SDEO (Male) Charbagh Swat	-do-
15.	Mr. Najeem Ullah, SST (BS-16) GHS Maidan Banda Dir Lower	SDEO (Male) Lal Qila Dir Lower (OPS)	-do-
16.	Mr. Mr. Gul Faraz, SDEO (BS-17) Bahrain Swat	SDEO (Male) Karak	V.S#17

Sub Divisional Education Officer  
(male) Karak



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

17.	Mr. Muhammad Farooq, SDEO (BS-17) Karak	SDEO (BS-17) Bahrain Swat.	V.S#16
18.	Mr. Ayub Khan, HM BS-17 GHS Anar Baig Mardan	SDEO (Male) Dagar Buner	V.S#19
19.	Mr. Love Dan, SDEO (BS-17) Dagar Buner	Assistant Director at Directorate of E&SE	A.V.P
20.	Mr. Abdus Samad, SDEO (BS-17) Dargai	Services placed at the disposal of Directorate of E&SE for further posting	---

2. No TADA is allowed.

Endst: of even No. & Date

SECRETARY

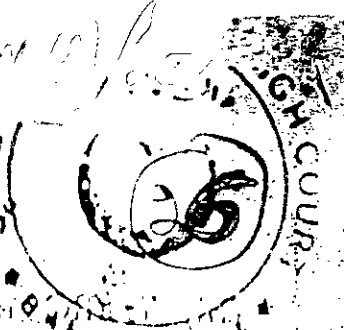
Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar
3. District Education Officers (Male), Concerned.
4. District Accounts Officers, Concerned.
5. PS to Advisor to CM for E&SED, Khyber Pakhtunkhwa.
6. PS to Secretary E&SE Department, Khyber Pakhtunkhwa.
7. PA to Additional Secretary E&SED, Khyber Pakhtunkhwa.
8. In-charge EMIS E&SE Department.
9. Officers Concerned.
10. Master file.

13/11/2018  
(ANWAR AKBAR KHAN)  
SECTION OFFICER (SCHOOLS MALE)

Sub Divisional Education Officer  
(male) Karak

SEAL



Writ Petition No. 1020 of 2018

Sub-Divisional Education Officer (Male) Primary Karak, presently under transfer as S.D.E. (M) Primary, Karak Tehsil & District Sawat. Petitioner

VERSUS

1. Provincial Govt. of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa Civil Secretariat, Peshawar.
2. Secretary Elementary & Secondary Education Department Civil Secretariat, Peshawar. Respondents

3/12/18  
FILED

Note: Addresses given above are sufficient for proper service.

WRIT PETITION UNDER ARTICLE 199 OF THE CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN, 1973 AGAINST THE NOTIFICATION NO. SO (SM) E & SED/2-1/2018/POSTING/TRANSFER/2018 DATED PESHAWAR THE NOVEMBER 13, 2018 VIDE WHICH THE PETITIONER HAS BEEN TRANSFERRED FROM SUB DIVISIONAL EDUCATION OFFICER(MALE) PRIMARY KARAK TO SUB DIVISIONAL EDUCATION OFFICER(MALE) BAHRAIN SAWAT.

Photocopy of impugned notification dated Peshawar The November 13, 2018 is enclosed as Annexure "A"

Respectfully Sheweth:

ATTESTED

EXAMINER  
Peshawar High Court

FACTS.

1. That the petitioner is bonafide and permanent resident of village Mitha Wala Tehsil & District Karak and was serving as Assistant District Education Officer BPS-16 and was adjusted as Incharge Sub-Divisional Education Officer BS-17 (Male), Karak in the office District Education Officer (Male), Karak.

Filed Today

7/11

... Officers (ASDEO) BS-16 to post of District Education Officer (SDEO) BS-17 vide notification bearing No. SO/50 (SM) F & SED/3-2/2018/Promotion of ASDEOs (BS-16 to SDEOs BS-17 (Management Cadre) Dated Peshawar the September 26, 2018 in the Elementary & Secondary Education Department on regular basis whereby the petitioner has been shown at S. No. 2. ----- (Photocopy of promotion notification at ASDEOs BS-16 to SDEOs BS-17 dated Peshawar the September 26, 2018 is enclosed as Annexure "B")

3. That the Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar has issued adjustment order vide notification No. SO/50 (SM) F & SED/3-2/2018/Promotion of ASDEOs (BS-16 to SDEO) BS-17 dated Peshawar the October 29, 2018 whereby the petitioner has been adjusted as SDEO (BS-17) Karak shown at S. No. 25. ----- (Photocopy of adjustment notification Dated Peshawar the October 29, 2018 is enclosed as Annexure "C").

4. That in compliance of the above mentioned adjustment notification dated Peshawar the October 29, 2018, the petitioner resumed his charge report as SDEO (M) (Male), Karak vide Endst: No. 1043-47 dated 30-10-2018 in the office of District Education Officer (Male), Karak. ----- (Photocopy of charge Report is enclosed as Annexure "D").

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5. That after resumed his charge as SDEO (Male) Primary Karak the petitioner started his official duty in the office of District Education Officer (Male), Karak.

6. That just after 14 days of adjustment order dated November 29, 2018, the Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa Peshawar issued another order of posting / transfer of SDEOs vide Notification SO (SM) F & SED/2-1/2018/Posting/Transfer/2018 Dated Peshawar The November 13, 2018 whereby the petitioner has been transferred from SDEO (M) Primary Karak to SDEO (M) Bahrain Swat ----- (Photocopy of notification dated Peshawar The November 13, 2018 is already enclosed as Annexure "A").

ATTESTED  
NAMINER  
Peshawar High Court  
Khyber Pakhtunkhwa

*[Handwritten signature]*

That the ...



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issued without lawful authority and is purely based on political grounds hence the same as assal before this honourable court inter alia on the following grounds.

Grounds.

- a. That the impugned posting/transfer order dated November 13, 2018 whereby the petitioner has been transferred from SDEO (M) Primary, Karak to SDEO (M) Bahrain Swat is illegal, unlawful against the law & facts, issued without lawful authority and is not sustainable in the eye of law
- b. That the petitioner has not been completed ~~service~~ which is against the law and based on arbitrariness against the service rules hence liable to be cancelled
- c. That without assigning any cogent reason the impugned posting/transfer order has been issued by the competent authority on melafide intention and just to adjust the pick & choose of the blue eyed officers at their choice station.
- d. That political interference in the impugned posting / transfer order cannot be ruled out.
- e. That merit position of the petitioner is in 3<sup>rd</sup> position in the whole KP province while in top position in District Karak in seniority list.
- f. That the impugned posting/transfer order is not against vacant post rather is versus transfer which is against the policy and law.
- g. That the aged mother of petitioner is seriously suffering of chronic disease which need proper attention of the petitioner whereas the impugned posting station is far flung area.
- h. That any other point will be agitated at the time of argument with permission of this honourable court.

*Handwritten signature*

FILED  
2018

APPEARED  
BY

29

Prayer in writ petition.

So it is, therefore, most humbly and respectfully prayed that on acceptance of the instant writ petition this honourable court may very graciously be pleased to issue writ directing the respondents to cancel the impugned posting/ transfer No. Notification SO (SM) E & SED/2-1 / 2018 / Posting/Transfer/2018 Dated Peshawar The November 13, 2018 to the extent of petitioner is illegal, unlawful, against the law and facts, passed without lawful authority, based on political victimization and mala fide intentions.

Interim Relief

It is further most humbly and respectfully prayed that this honourable court may be suspended the operation of the impugned notification No. Notification SO (SM) E & SED/2-1/2018/Posting/Transfer/2018 Dated Peshawar The November 13, 2018 only to the extent of petitioner till final decision of the main writ petition.

Dated:- 14-11-2018 Petitioner Muhammad Farooq

Through

Muhammad Farooq Khattak  
Advocate, Karak.

Certificate

Certified that no such like writ petition has been filed on similar grounds earlier before this court or any other court.

Petitioner Muhammad Farooq

Law Books

1. The constitution of Islamic Republic of Pakistan, 1973.
2. Case law according to need.

Stamp of the court with handwritten text.

Filed Today  
15/11/2018  
Additional Registrar

JUDGMENT SHEET  
IN THE PESHAWAR HIGH COURT,  
BANNU BENCH.

(Judicial Department)

W.P No. 1020-B of 2018

Muhammad Farooq

Vs

Govt. of Khyber Pakhtunkhwa etc.

JUDGMENT

Date of hearing 26/11/2018

Appellant-Petitioner By Ahmad Farooq, Chatterk A/o

Respondent \_\_\_\_\_

SHAKEEL AHMAD, J.--- Through the instant petition filed

U/A-199 of the Constitutional of Islamic Republic of Pakistan 1973,

the petitioner has assailed the notification dated 13.11.2018,

whereby he was transferred from District Karak to Bahrain.

2. Brief facts of the case are that the petitioner was posted

as SDEO (M) Karak in BPS-17, vide impugned notification dated

(Inrazanullah) (11/11) Mr. Justice Muhammad Nasir Malik and Justice Shakeel Ahmad

... was transferred from Karak to Bahrain, hence, this

30

Learned counsel for the petitioner argued that transfer of the petitioner is politically motivated, therefore, the same is liable to be set-aside, however, when he was confronted with the Article-212 of the Constitution of Islamic Republic of Pakistan, 1973, he stated that he would not press the instant petition, the same may be treated as departmental appeal and sent to the competent authority for decision in accordance with law.

4. IN view of the above, this petition is treated as departmental appeal and sent to Secretary Elementary and Secondary Education, Civil Secretariat, Peshawar for decision in accordance with law.

SD/- Mr. Justice ...  
SD/- Mr. Justice ...el Ahmad J

Announced.  
26.11.2018

Office  
23/11/2018

CERTIFIED TO BE TRUE COPY

Examiner  
Peshawar ...  
Authentic ...  
The Qanoon ...

29/11/18

## DEPARTMENT

Dated Peshawar the February 07, 2019

EC 39  
39

EC/2-1/2019/Posting/Transfer/MC: The Competent  
 authority is pleased to order posting/transfer of the following officers of  
 Cadre/Teaching Cadre on the posts/stations as mentioned against  
 interest of public service, with immediate effect:

Name & Designation	From	Posted as	Remarks
Ms. Naheed Akhtar, HM (BS-17)	GGHS Thathal D.I. Khan	HM (BS-17) GGHS Malana D.I. Khan	w.e.f 11.02.2019
Mr. Muhammad Farooq, SDEO (BS-17)	SDEO (Male) Bahrain Swat	SDEO (Male) Karak	V.S#3
Mr. Gul Faraz, SDEO (BS-17)	SDEO (Male) Karak	SDEO (Male) Bahrain Swat	V.S#2

2. No TA/DA is allowed.

SECRETARY

Endst: of Even No. & Date:

Copy forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director E&SE, Khyber Pakhtunkhwa, Peshawar
3. District Education Officers (Male & Female), Concerned.
4. District Accounts Officers, Concerned.
5. PS to Advisor to CM for E&SE Department.
6. PS to Secretary, E&SE Department.
7. PS to Special Secretary, E&SE Department.
8. In-charge EMISE E&SE Department.
9. Officers Concerned.
10. Master file.

(SHABIR KHAN) 07/2/19  
SECTION OFFICER (SCHOOLS MALE)

**BEFORE THE KPK, SERVICE TRIBUNAL PESHAWAR.**

**Service Appeal No. 511/2019**

Gul Faraz

VS

Education Deptt:

.....

**REJOINDER TO REPLY ON BEHALF OF APPELLANT**

.....

**RESPECTFULLY SHEWETH:**

**Preliminary Objections:**

(1-8) All objections raised by the respondents are incorrect and baseless. Rather the respondents are estopped to raise any objection due to their own conduct.

**FACTS:**

- 1 Para-1 of the appeal is admitted correct by the respondents as service record is already in the custody of respondent department.
- 2 Admitted correct by the respondent. Moreover respondent no.4 reply is incorrect and mislead the court.
- 3 Incorrect. While para-3 of the appeal is correct as mentioned in the main appeal of the appellant.
- 4 Incorrect. While para-4 of the appeal is correct as mentioned in the main appeal of the appellant.

**GROUND:**



- A) Incorrect. The orders of the respondents are against the law, rules and norms of justice therefore not tenable and liable to be set aside.
- B) Incorrect. While para-B of the appeal is correct as mentioned in the main appeal of the appellant.
- C) Incorrect. While para-C of the appeal is correct as mentioned in the main appeal of the appellant.
- D) Incorrect. While para-D of the appeal is correct as mentioned in the main appeal of the appellant. Moreover, it is efficiency of the appellant's wife as admitted by the deptt. The government servant has the option to retire or not and this lame excuse on the behalf of the deptt cannot denied the legal plea of the appellant.
- E) Incorrect. While para-E of the appeal is correct as mentioned in the main appeal of the appellant. Moreover as explain in above paras.
- F) Incorrect. While para-F of the appeal is correct as mentioned in the main appeal of the appellant.
- G) Incorrect. While para-G of the appeal is correct as mentioned in the main appeal of the appellant.
- H) Incorrect. While para-H of the appeal is correct as mentioned in the main appeal of the appellant. Moreover, there is no such policies exist posting on the basis of merit. Because there is no such practice in other districts.

- I) Incorrect. While para-I of the appeal is correct as mentioned in the main appeal of the appellant.
- J) Incorrect. While para-J of the appeal is correct as mentioned in the main appeal of the appellant
- K) Legal.

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

**APPELLANT**

Through:

  
(M. ASIF YOUSAFZAI)  
&  
  
SYED NOMAN ALI BUKHARI  
ADVOCATE, PESHAWAR.

**AFFIDAVIT**

It is affirmed and declared that the contents of rejoinder are true and correct to the best of my knowledge and belief.

  
DEPONENT

**ATTESTED**



29-7-219