

BEFORE THE HONOURABLE KPK SERVICE TRIBUNAL PESHAWAR
CAMP COURT ABBOTTABAD.

Service Appeal No.2444/2023

Rafique JavidAPPELLANT.

VERSUS

1. Secretary Elementary & Secondary Education KPK Peshawar.
2. Director Elementary & Secondary Education KPK Peshawar.
3. District Education Officer (Male) Mansehra
4. Director EMIS, Elementary & Secondary Education KPK Peshawar.....**RESPONDENTS.**

PARAWISE COMMENTS / WRITTEN REPLY ON BEHALF OF RESPONDENTS

NO 1,2, 3 & 4:-

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DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

52-02-24

BEFORE THE HONOURABLE KPK SERVICE TRIBUNAL PESHAWAR
CAMP COURT ABBOTTABAD.

Service Appeal No.2444/2023

Rafique Javid**APPELLANT.**

VERSUS

**Khyber Pakhtunkhwa
Service Tribunal**

1. The Secretary Elementary & Secondary Education KPK Peshawar.
2. The Director Elementary & Secondary Education KPK Peshawar.
3. The District Education Officer (Male) Mansehra.
4. The Sub Divisional Education Officer (Male) circle Mansehra.....

Diary No. 11004
Dated 02-02-2024

RESPONDENTS.

PARAWISE COMMENTS / WRITTEN REPLY ON BEHALF OF RESPONDENTS

NO 1, 2, 3 & 4:-

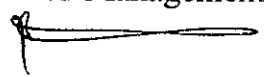
PRELIMINARY OBJECTIONS:-

1. That the appellant has got no cause of action locus standi.
2. That the appellant has concealed material facts from his Honorable Tribunal in the instant service appeal. Hence not entitled for any relief and appeal is liable to be dismissed without any further proceeding.
3. That the instant service appeal is based on malafide intentions.
4. That the appellant has not come to this Honorable Tribunal with clean hands.
5. That the appellant is not entitled for the relief he has sought from this Honorable Tribunal.
6. That the instant service appeal is against the prevailing law and rules.
7. That the appeal is based on malafide intentions just to put extra pressure on the Respondents for gaining illegal service benefits.
8. That the instant service appeal is not maintainable in its present form.
9. That the appeal is liable to be dismissed for non-joinder /mis-joinder of necessary parties.
10. That the appellant has filed the instant appeal on malafide motive.
11. That the instant appeal is not maintainable in the present form and also in the present circumstances of the issue.
12. That the honorable court has no jurisdiction to adjudicate the present appeal.
13. That the instant appeal is premature.
14. Section 4 & 10 of the Khyber Pakhtunkhwa Civil Servant Act 1973 empower the executive authority/ Chief Minster Khyber Pakhtunkhwa Peshawar regarding posting/transfer of civil servant to anywhere in the province or outside the province including the appellant.



FACTUAL OBJECTIONS:

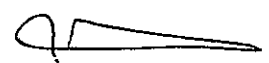
1. Para No.1 is incorrect that the appellant was serving as a SST in JICA Model Primary School and adjusted as a ASDEO Circle Phulra, whereas it is clearly mentioned in Note Para 1 "that Posting/Adjustment shall be considered as stop gap arrangement till the arrival of Management cadre officers", whereas the appellant concerned failed and showed incompetency against the said post therefore he was relieved by the SDEO (Male) Mansehra.
2. Para No.2 is correct to the extent that the Appellant namely Rafique Javed as a teaching cadre as a SST (G) borne on teaching cadre was working on Management cadre post of ASDEO Circle Mansehra purely on stop gap basis, whereas the reporting officer of ASDEO was is SDEO (Male) Mansehra, whereas Sub Divisional Education officer Mansehra vide his No.97-100 dated 9-08-2023 relieved the teacher concerned by levelling numerous charges of inefficiency, disobedience, incompetence and serious slackness in performance of his duties, and placed his services at the disposal of DEO(M) Mansehra for further adjustment at any school. On this DEO (M) Mansehra was left no other choice but to adjust him at GHSS Perhinna vide DEO(M) Mansehra No.7722-24 dated 29-08-2023, whereas DEO (M) Mansehra is competent to issue passing transfer order of SST within District. On this the teacher concerned made appeal before the Honourable Peshawar High Court Bench Abbottabad bearing writ Petition No.1125-A/2023, which was submitted to the Director Elementary and Secondary Education Peshawar for decision, Whereas the Director Elementary and Secondary Education Peshawar after having Thread Bear discussion with all the stake holders rejected his appeal vide No.5597-5601 dated 8-11-2023, On this he preferred another appeal before the Departmental Grieviences Redressel Committee on 05-01-2024, which was categorically rejected and uphold the action taken by the Director E&SE and DEO (M) Mansehra and permanently debarred the concerned teacher for any managerial post, whereas from 29-08-2023 to uptill now he had not resumed his duty at GHSS Perhinna Mansehra, the post of ASDEO Circle Mansehra, which he was holding previously has been filled by the worthy Director Elementary and Secondary Education Peshawar vide his No.7590-dated 15-12-2023, whereas as per verdict of the Honourable Service Tribunal, the teaching cadre cannot be adjusted against the post of Management



Cadre, the same nature case has been decided in favour of respondent department in service Appeal No.1218/2023 decided on 23-05-2023.

(Copy of Appointment order, Relieving Chit of Mr. Rafique Javed, writ petition 1125-A/2023, Judgment dated 26-09-2023, Rejection of Appeal, ,transfer order of Rafique Javed 29-08-2023,adjustment order issued by Director dated 15-12-2023, Judgment of Honourable Service Tribunal dated 23-05-2023 are annexed as annexure A,B ,C,D,E,F,G & H)

3. Para 3 is incorrect to the extent that Mr. Rafiq Javed is working as ASDEO circle Male Mansehra and belongs to the teaching cadre, not from management cadre, while SDEO Male relieved the teacher concerned by levelling numerous charges of inefficiency, disobedience, incompetence and serious slackness in performance of his duties, and placed his services at the disposal of DEO(M) Mansehra for further adjustment at any school due to his official negligence as well as failing in smooth running of Educational activities in the said circle. Whereas the civil servant, who's in the relevant grade cannot claim posting against his choice post, rather it is the domain and prerogative of the departmental authorities to post a civil servant against any post but proper person against the proper post should be posted as per apex court judgment "2018 SCMR Page No 1141. titled Khan Muhammad vs Chief Secretary Balochistan and others" whereas as per verdict of the Honourable Service Tribunal in service Appeal No.1218/2023 dated 02-10-2023 titled as Mst: Musarat Begum vs Govt of KPK And others, "the teaching cadre cannot be adjusted against the post of Management Cadre." In the present case the appellant has completely failed to perform his duty on the post of ASDEO, Therefore he was adjusted against his original post of SST (G) at GHSS Perhinna Mansehra. as per report of the SDEO, Whereas the work was suffering in the circle of the Mansehra due to non-presence of proper ASEO as such to make service delivery effective and ensure the good governance and keeping in view the problem of circle Mansehra, Whereas DEO (M) Mansehra made internal adjustment order vide Endst No.7651-58 dated 25-08-2023 in the interest of Public service and the case was forwarded for approval to Director Elementary and Secondary Education which was properly approved by the Director Elementary and Secondary Education KPK Peshawar vide NO. 5597-5601/F.No 447/SST (M)/Complaints/Mansehra dated 8/11/2023.



(Copy of internal adjustment order is annexed as annexure I)

4. Para 4 is incorrect, Mr. Rafiq Javed was relieved off his duty as ASDEO due to his inefficiency, non-cooperativeness and non-professionalism ,he was then adjusted to GHSS Perhina and he was not transferred but adjusted as Secondary School Teacher (SST) which is his actual cadre. Whereas the civil servant, cannot claim posting against his choice post rather it is the domain and prerogative of the departmental authorities to post a civil servant against any post but proper person against the proper post should be posted as per apex court judgment **“2018 SCMR Page No.1142 ,titled Khan Muhammad vs Chief Secretary Balochistan and others”**.

5. Para 5 is incorrect that Sub Divisional Education officer Mansehra vide his No.97-100 dated 9-08-2023 relieved the teacher concerned by levelling numerous charges of inefficiency, disobedience, incompetence and serious slackness in performance of his duties, and placed his services at the disposal of DEO(M) Mansehra for further adjustment at any school, on this DEO (M) Mansehra was left no other choice to adjust him at GHSS Perhinna vide DEO(M) Mansehra No.7722-24 dated 29-08-2023,whereas DEO (M) Mansehra is competent to issue Posting transfer orders of SST’s within district. The appellant was adjusted against his original post in this regard DEO is competent to transfer/Adjust SST’s as delegated by the Director Elementary and secondary Education Peshawar, in the current case the case was also forwarded to the Competent Authority for formal approval vide letter No.7617 dated 24-08-2023.

6. Para is correct that the departmental appeal was rejected by the Competent Authority vide Endst No.5597-5601 dated 08-11-2023.

7. Para No.7 incorrect and misleading, that the appellant is not aggrieved person in the meaning of service rule and policy in the following grounds




GROUNDS:-

A. Incorrect and denied, Sub Divisional Education officer Mansehra vide his No.97-100 dated 9-08-2023 relieved the teacher concerned by levelling numerous charges of inefficiency, disobedience, incompetence and serious slackness in performance of his duties, and placed his services at the disposal of DEO(M) Mansehra for further adjustment at any school, on this DEO (M) Mansehra was left with no other choice but to adjust him GHSS Perhinna vide

(5)

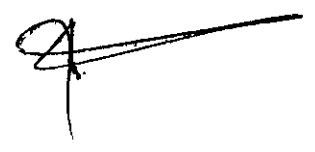
DEO(M) Mansehra No.7722-24 dated 29-08-2023, whereas DEO (M) Mansehra is competent to issue passing transfer order of SST's within district, whereas the transfer order of appellant was issued due to in-competency of the appellant, in this regard the report of the SDEO dated 13-05-2023 and 12-08-2023 reflect that he has failed to perform his duties being ASDEO and it is further added that the ASDEO Circle Mansehra also showed misconduct, misbehave with SDEO, lack of interest and irresponsibility in his job.

(Copy of report of SDEO dated 13-05-2023 and proposal for Adjustment dated 12-08-2023 are annexed as annexure J & K)

- B. Incorrect and misleading that the civil servant cannot claim posting against his choice post rather it is the domain and prerogative of the departmental authorities to post a civil servant against any post but proper person against the proper post should be posted as per apex court judgment **"2018 SCMR Page No.1142, titled Khan Muhammad vs Chief Secretary Balochistan and others"**. And the appellant transfer order is lawful and in accordance with the rules and policy in vogue by the Provincial Government.
- C. Incorrect and misleading as the appellant was adjusted against his original post in this regard DEO is competent authority to transfer/Adjust SST's, in the current case the case was also forwarded to the Competent Authority for formal approval vide letter No.7617 dated 24-08-2023. Now the post of ASDEO Mansehra has been filled by Director E&SE KPK Vide No 5597-5601/F.No 447/SST (M)/Complaints/Mansehra dated 8/11/2023.
- D. Para is incorrect that the reporting officer of ASDEO Circle Mansehra is SDEO (Male) Mansehra, whereas Sub Divisional Education officer Mansehra vide his No.97-100 dated 9-08-2023 relieved the teacher concerned by levelling numerous charges of inefficiency, disobedience, incompetence and serious slackness in performance of his duties, and placed his services at the disposal of DEO (M) Mansehra for further adjustment.
- E. Para E is totally incorrect and misleading, hence denied. 
- F. Para is incorrect and misleading, as the appellant was adjusted against his original post of SST (G), wherein in this regard DEO is competent to transfer/adjust SST as delegated by the Director, Elementary and secondary Education Peshawar, in the current case the case was also forwarded to the Competent Authority for formal approval vide letter No.7617 dated 24-08-2023, which was also approved by the Competent Authority.
- G. Para No. G is incorrect and misleading, detail reply has already been given in above foregoing paras.

H. Para H is incorrect and denied, the transfer order of appellant was issued due to in-competency of the appellant, in this regard the report of the SDEO dated 13-05-2023 and 12-08-2023 reflect that he has failed to perform his duty being ASDEO and it is further added that the ASDEO Circle Mansehra has also shown misconduct, misbehave with SDEO, lack of interest and irresponsibility in his job. As SDEO is the principal reporting office in respect of ASDEO'S, whatever has been done was strictly based on the detailed report of SDEO(M) Mansehra who relieved him and placed him at the disposal of DEO ,to adjust him on vacant post of SST at GHSS Perhinna vide No.7722-24 dated 29-08-2023,uptill Now he has not obeyed the legal order of authorities and is absent from his duties as (SST) at GHSS Perhinna from last few months, due to which the post of ASDEO has been filled by the Director E & SE Peshawar vide No.7590 dated 15-12-2023.

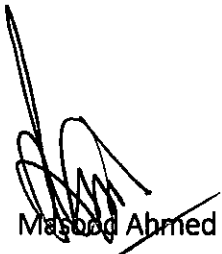
- I. Incorrect and misleading, detail reply has already been given in above foregoing paras.
- J. Incorrect and misleading, Respondents department are bound to exercise their power justly fairly honestly in the light of rules and policy of the Govt.
- K. Para is incorrect and misleading detail reply has already been given in above foregoing Paras.
- L. Para is incorrect and misleading, in response to detailed report of SDEO this office was left with no other choice but to adjust him against his original post of SST (G) at GHSS Perhinna Mansehra vide No.7722-24 dated 29-08-2023 due to his official negligence as well as failing for smooth running of Educational activities in the said circle.
- M. Incorrect and misleading respondent department can never think of any violation of Articles of Islamic Republic of Pakistan and respondents are bound to exercise their power justly fairly honestly in the light of rules and policy in vogue by the Govt.
- N. Incorrect and denied, as per rules and policy prevailing by the Government the officer of any cadre is bound to obey the order of Competent Authority wherever authority assign his duties in the larger interest of Public Service.
- O. Para pertains to record.
- P. Incorrect and misleading respondent department can never think of any violation of Articles of Islamic Republic of Pakistan and respondents are bound to exercise their powers justly fairly honestly in the light of rules and policy vogue by the Govt.
- Q. Respondent department cannot think of any violation under articles of Islamic Republic of Pakistan, Respondents will raise more facts/grounds with the permission of this Honourable



Court at the time of Arguments. The stand of the Appellant is incorrect he is not liable to any kind of remedy.

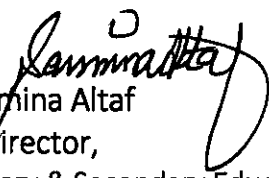
PRAYER:

In the view of above factual position it is humbly prayed that this Honorable Tribunal may very graciously be pleased to dismiss the instant service appeal with cost in favor of the Respondent Department in the interest of justice.



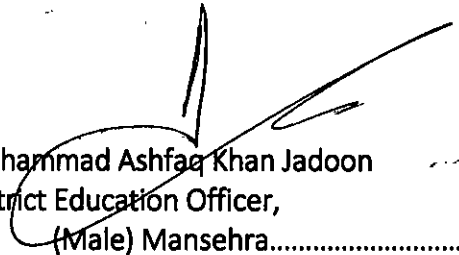
Masood Ahmed
Secretary

Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.....Respondent No.01



Samina Altaf
Director,

Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.....Respondent No 2



Muhammad Ashfaq Khan Jadoon
District Education Officer,
(Male) Mansehra.....

Respondent No.03

8

BEFORE THE HONOURABLE KPK SERVICE TRIBUNAL PESHAWAR
CAMP COURT ABBOTTABAD.

Service Appeal No.2444/2023

Rafique Javid**APPELLANT.**

VERSUS

1. Secretary Elementary & Secondary Education KPK Peshawar.
2. Director Elementary & Secondary Education KPK Peshawar.
3. District Education Officer (Male) Mansehra
4. Director EMIS , Elementary & Secondary Education KPK Peshawar.....**RESPONDENTS.**

PARAWISE COMMENTS / WRITTEN REPLY ON BEHALF OF RESPONDENTS

NO 1,2, 3 & 4:-

PARAWISE COMMENTS / WRITTEN REPLY ON BEHALF OF RESPONDENTS

NO 1,2 & 03 ARE AS UNDER:-

AFFIDAVIT

I, Muhammad Ashfaq Khan Jadoon District Education Officer (M) Mansehra do, hereby solemnly affirm and declare that the Para wise comments of the Service Appeal No.2444/2023 titled as Rafique Javed versus Govt, is true to the best of my conviction and belief and nothing has been concealed from this Honourable Court. It is further decided on oath that in this appeal, the answering respondents have neither been placed ex-parte nor their defense has been struck off/*cost*.

DEPONENT _____

**DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA**

[Signature]
**DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA.**



10 5 JAN 2024

Annex-A P12^A (53)

OFFICE OF THE DEPUTY DIRECTOR OF EDUCATION(S) HAZARA DIVISION ABBOTTABAD.

OFFICE ORDER NO. 58 /AE-III
CT(MALE).
DATED ABBOTTABAD THE, 17/6 /1993.

APPOINTMENT/ADJUSTMENT.

The following appointment/adjustment of the trained CT candidates (Long Course) are hereby ordered against CT/SV post as noted against each in BPS-9(Rs.1185-72-2265) and BPS-14(Rs.1530-119-3315) in case of BA/BSc, 2nd; Division) plus usual allowances as admissible under the rules with effect from the date of their taking-over charge on the following terms & conditions in the interest of public service:-

S.NO.	Name/Father's Name/Qualification/ with Address.	School where posted/Adjust- -ed.	Remarks.
1.	Mr. Farhad Khan, FA/CT trd: work: ag: SV post at GMS, Gorakki.	GMS, Billah, Haripur.	ag: vacant CT post.
2.	Mr. Muhammad Hafeez, FA/CT trd: working ag: SV post at GHS, Kariplan, Haripur.	GMS, Kohala Payeen.	-do-
3.	Mr. Tahir Osman, FA/CT trd: working ag: SV post at GHS, Ghazi.	GHS, Sirikot.	ag: vacant CT post vice Mr. Musaddiq Shah proceeded on LPR wef 1.5.93.
4.	Mr. Muhammad Fiaz Khan, B.Sc CT trd: working ag: SV post at GMS, Phallah, A/Abad.	GMS, Nagri Tutial.	ag: vacant CT post.
5.	Mr. Tasnimur Rehman, BA/CT trd: working ag: SV post at GMS, Bagla, Hpr:	GMS, Cutba Dhaka.	ag: vacant n/c C.T. post.
6.	Mr. Muhammad Asif, M.Sc/CT trd: working ag: SV post at GHS, Seer.	GHS, Sarhan.	-do-
7.	Mr. Bashir Ahmed, BA/CT trd: work: ag: SV post at GMS, Jambura.	GHS, Rashing.	-do-
8.	Mr. Shaheed ul-Islam, B.Com/Ct Trd: working ag: SV post at GMS, Bagla.	GMS, Cutba Dhaka.	-do-
9.	Mr. Rafique Ahmed, BA/CT trd: work: ag: SV post at GMS, Kotla, Hpr:	GMS, Khei Maira.	-do-
10.	Mr. Waqar Ahmed, FA/CT trd: work: ag: SV post at GHS, Sehaki Bala.	GMS, Khambian.	-do-
11.	Mr. Muhammad Afzar Abbasi, B.Sc/CT trd: work: ag: SV post at GMS, Pattan Kalan, A/Abad.	GMS, Makbol Payeen.	-do-
12.	Mr. Altaf Ullah, BA/CT trd: work: ag: SV post at GMS, Hilket.	GMS, Khambian.	-do-
13.	Mr. Naeem Gul, B.Sc/CT trd: work: ag: SV post at GHS, Dalola.	GMS, Tarhana.	ag: vacant CT post
14.	Mr. Muhammad Bashir, B.Sc/CT trd: working ag: SV post at GHS, Shungli Payeen, Mansehra.	GMS, Gurwal.	ag: vacant N/C C.T. post.

Contd: P/2.

P-13

Mr. Anshad Khan Talvi
 Pakistan
 adjacent to
 Abbottabad

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|-----|--|-------------------------------|--|
| 15. | Mr. Zahir Shah, B.Sc/CT Trd: work: ag: SV post at GMS, Hassan Bai, Hpr: | GMS, Khoi Maira. | ag: vacant N/CT post. |
| 16. | Mr. Javeed Iqbal, FA/CT trd: work: ag: SV post at GHSS, Pattah, Koh: | GHS, Jalgali. | -do- |
| 17. | Mr. Saleem Khan, FA/CT trd: work: ag: SV post at GMS, Kaneeri, H/Pur, | GMS, Kaneeri. | ag: vacant CT vice Mr. Alta. Ahmed, Project resumed CT post. |
| 18. | Mr. Abdul Hafeez, BA/CT trd: work: ag: SV post at GHS, Seo (Kohistan). | GMS, Bagh, (Mansehra). | ag: vacant n/c T. post. |
| 19. | Mr. Muhammad Latif Khan, FA/CT trd: working ag: SV post at GMS, Brug, Amazai. Haripur. | GMS, Pukshai. (Haripur). | ag: vacant n/c T. post. |
| 20. | Mr. Javaid Khan, CT trd: work: ag: SV post at GMS, Qazipur. | " -do- | -do- |
| 21. | Mr. Amjad Saeed, BA/CT trd: work: ag: SV post at GMS, Sarhadna, H. Pur. | " Tili Hassan Zai. (KD). | ag: vacant CT vice Mr. Abdul Qadoo, refuse to join CT post. |
| 22. | Mr. Muhammad Yousaf, BA/CT trd: S/O Muhammad Daud r/o Chetti Dehri, Moh: Aurangzebabad, Bedra Road, Mansehra. | GMS, Asharban. | ag: vacant CT |
| 23. | Mr. Aneesur Rehman, BA/CT trd: S/O Ghulam Mustafa, vill: Mandhiar, PO Attershisha, Mansehra. | GMS, Battangi. | ag: vacant n/c CT post. |
| 24. | Mr. Muhammad Naseem, BA/CT trd: S/O Talbot Khan, PTC, GPS, Bersar (Thakot) C/O Sher Badhar, Asstt: SDEO(F) Battagram. | GMS, Battangi. | -do- |
| 25. | Mr. Muhammad Tahir, BA/CT trd: S/O Qazi Karim Abdullah, Village, Mandhiar, PO Attershisha, Mansehra. | GMS, Garwal. | -do- |
| 26. | Mr. Hafiz Mujeebur Rehman, BA/CT trd: S/O Abdul Latif, Village Kander PO Phulra, Mansehra. | GMS, Shera Kot. | ag: vacant CT vice Mr. Muham Sharif, refuse to join CT post. |
| 27. | Mr. Muhammad Maroof, BA/CT trd: S/O Muhammad Farooq, Katvi Char Kander, PO Shehal Mazullah, Man: | GMS, Kalai (Kch) | ag: vacant n/c CT post. |
| 28. | Mr. Tahir Ellahi, BA/CT trd: S/O Imam Din, Vill: Bhsghian, Teh: B/Mansehra C/O Hazara Cloth House Rustam Bazar, Balakot. | GMS, Bag (Pttan) Kohistan. | -do- |
| 29. | Mr. Munir Hussain, D-Com/CT trd: S/O Habibur Rehman, Vill: & PO Bharyal, Mansehra. | -do- | -do- |
| 30. | Mr. Khurshid Ahmed, MA/CT trd: S/O Muhammad Yasin, Vill: Pan Dheri, Khaki Doraha, Mansehra. | GMS, Bahil Qilla, (Kohistan). | -do- |
| 31. | Mr. Khurshid Akhtar, FA/CT trd: S/O Muhammad Firdoon Khan, Teh: Balakot (Mansehra). | -do- | -do- |

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- 32. Mr. Jaffar Shah, FA/CT trd: S/O Miskeen Shah, Vill: & PO Bherkund, Mansehra. GMS, Harigah. (Kohistan). ag: Vacant CT post.
- 33. Mr. Abdal Aziz, FA/CT trd: S/O Amin-ul-Mag, Vill: Khola (Nullah) PO Dubrian, Mansehra. GMS, Ghari Shabi Khel (Koh:). -do-
- 34. Mr. Shahzad Hussain Shah, FA/CT trd: S/O Rehman Shah, via: Baiffa vill: & PO Nekot, Mansehra. GMS, Baneel (Jag) (Kohistan). ag: vacant n/c CT post.
- 35. Mr. Muhammad Jamil, FA/CT trd: S/O Muhammad Iqbal, PT/Govt: Mosque Primary School, Kashka, Haripur. GMS, Bella. (Kohistan). -do-
- 36. Mr. Muhammad Fereez FA/CT trd: work: ag: PTC post at GMS, Labourkot, Mansehra. GMS, Gaddar, (Kohistan). ag: vacant CT post
- 37. Mr. Sajjad Hussain Shah, FA/CT trd: B/O Mir Hussain Shah, Vill: & PO Notkot, Mansehra. GMS, S, Harban, (Kohistan). -do-
- 38. Mr. Banaras Khan MA/LLB CT Trd: work: U.D.C at O/O Asstt: Director (Field) Postal Life Insurance A'Abad. GHS, Seer (A'Abad) Agn: Vacant SV, post.
- 39. Mr. Muhammad Nawaz FSc/CT trd: S/O Abdul Sattar V: & PO, Jabba Mansehra. GHS; Pimal Sharif (Mansehra). -do-
- 40. Mr. Abdul Qadoos MA/B, Ed/CT trd: work: ag: PTC post at GPS, New Kharkot, Haripur. GMS, Khabbal. Haripur. -do-
- 41. Mr. Jamshed Ali BA/CT trd: S/O Raheem Ullah, Vill: & PO Mangla Teh: Balakot, Mansehra. GHS, Darband. -do-
- 42. Mr. Muhammad Saleem, FA/CT trd: S/O Abdur Rehman, Moh: Titwal, Vill: & PO Balakot, Mansehra. GHS, Talooos. -do-
- 43. Mr. Muhammad Pervez, BA/B, Ed/CT trd: work: ag: PTC post at GPS, Jarral. GMS, Gul Bansi. -do-
- 44. Mr. Muhammad Javed S/O Muhammad (MA/ Sadiq, Vill: & PO Khaki, Mansehra. Edu: CT) GMS, Bat-Doga. -do-
- 45. Mr. Fazal Hayat, MA/CT trd: S/O Ghulam Subhani, Vill: & PO Bagrian, Mansehra. GHS, Kanai. -do-
- 46. Mr. Javaid Iqbal, FA/CT trd: S/O Muhammad Ayub, Vill: & PO Tanool Banda Via: Guli Bagh, Mansehra. GMS, Hilkot. -do-
- 47. Mr. Muhstaq MA/B, Ed, CT trd: work: ag: PTC post at GPS, Arab Khan, Mansehra. GHS, Salam Khand, Haripur. -do-
- 48. Mr. Muhammad Sagheer, MA/CT trd: S/O Shah Zama, Vill: Gorr PO Serai Saleh, Haripur. GHS, Baghpur Dheri. -do-
- 49. Mr. Muhammad Farid, MA/CT trd: work: ag: Qari post at GHS, Khairabad, Mansehra. GMS, Pattan Kalan. -do-

(Signature)
Secretary
Government of Pakistan

Contd: P/3...

Ministry of Education
Jinnah Plaza Adjacent to
Distt: Bar Abbottabad

P/5

P/4

- 50. Mr. Saraj, FA/CT trd. S/O Khudadad Khan, V.P.I. Bahata PO Balakot, Mansehra. GMS, Malkot. ag: vacant SV post.
- 51. Mr. Inham Hussain Shah, BA/CT trd. S/O Mian Haleem Shah, O/O Superior Science Public School, Mansehra. GHS, Chamiall.
- 52. Mr. Azhar Iqbal Qureshi, M, S/CT trd. S/O Mir Alam (Late) H.No. KL-449, Link Road, Arad Bugh, A/Abad. GHS, Khatragal.
- 53. Mr. Rafiq Javed, BA/CT trd. S/O Ali Shah, O/O Al-Nawalee S. Kashmiri Bazar, Mansehra. GMS, Seri Khan, Kaslan.
- 54. Mr. Hafeez ur-Rahman, BA/CT trd. work: ag: DM post at GHS, Kallag (Haripur). GHS, Kallag (Haripur).
- 55. Mr. Muhammad Ashraf, CT trd. working ag: PTC post at GPS, Malikpura, Abbotabad. GHS, Sanhan. Atd:
- 56. Mr. Azma Hussain Kiani, MA/CT trd. S/O Raja Muzaffar Hussain Kiani, H.No. 292-KL, Mandi Mangre Saini Link Road, A/Abad. GMS, Kheri, Haripur.
- 57. Mr. Syed Afsar Shah, FA/CT trd. S/O Syed Umer Shah, O/O Raza Stationers, W.I. Va. PO. Shankari, Mansehra. GMS, Kohaja, Payeen, Haripur.

NOTES:-

- 1. NO TA/DA/TG is allowed. 2. Change reports should be submitted to all concerned.
- 3. The teacher who are not willing to join CT post noted against their names & intend to remain on their existing SV post should submit a written refusal to this effect to this office.

CONDITIONS:-

- 1. The appointment is purely on temporary basis and subject to termination at any time without notice or assigning any reason.
- 2. They should produce their age & health certificate from the MS concerned.
- 3. The Head of Institution/schools are required to check on original educational qualification certificates before handing over charge to them.
- 4. In case they wish to resign from service they will have to give one month's prior notice or forfeit one month pay in lieu of short notice.
- 5. The appointment shall stand automatically cancelled if they fail to join the post within 15 days of the issue of this order.
- 6. The newly appointees are required to get verify their academic certificates from Board/university concerned.

Contd: on P/5.

Amended
by B

The District Education Officer
Male Mansehra.

Subject: RELIEVING CHIT.

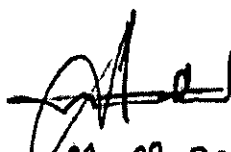
Memo

The service of Mr. Rafiq Javed (SST), ADSEO circle Mansehra is no more required, as he has been frequently disobeying the orders of his superior and has many complaints in regard to his duties.

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


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

Besides the ASDEO Circle Mansehra has always been non-cooperative having lack of competency, resulting in unsmooth working of circle and, thereby a constant headache to this Office.


09-08-2023

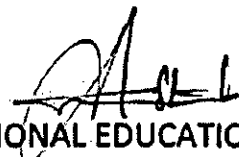
As a number of complaints have already been filed against ASDEO Circle Mansehra bearing this Office letter Numbers 1793 dated 13.5.23, No. 1871 dated 31.5.23, No. 1873 dated 1.6.23 and No. 1673 dated 14.3.23, therefore, the situation is enough to relieve him of an important duty and to place him at the disposal of District Education Officer Mansehra in the interest of Public Service with immediate effect.

13


SUB DIVISIONAL EDUCATION OFFICER
SUB DIVISION MANSEHRA.

Endst. No. 97-100-1 Dated the 9/8 /2023.

1. The District Accounts Officer Mansehra.
2. The ASDEO Circle Mansehra.
- ✓ 3. Office record.


SUB DIVISIONAL EDUCATION OFFICER
SUB DIVISION MANSEHRA



e (14)

BEFORE THE HONOURABLE PESHAWAR HIGH COURT,
ABBOTTABAD BENCH.

W.P. No. 1125-A /2023

Muhammad Rafique Javed ASDEO Circle Mansehra.

...PETITIONER

V E R S U S

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

...RESPONDENTS

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

5-16/14-2023

[Signature]

PRAYER:

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

FILED TODAY

**ADD: REGISTRAR
PHC, ABBOTTABAD BENCH**

[Signature]

(15)

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

Respectfully Sheweth,

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

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

FILED TODAY

ADD. REGISTRAR
P.R. ABDOU ALI KHAN BENSER
18/4/21

16

adjusted the petitioner at Circle Mansehra.

(Copy of order is annexed as Annexure "A")

3. That just as petitioner performed his duties with utmost dedication in the teaching cadre similarly in the management cadre, 9058 out of school children were admitted in school by the efforts of the petitioner in the session 2023-24 in the circle Mansehra, while in all other circles in this session not so many children's were admitted in schools.

4. That petitioner visited the Government Primary School Sarwarabad, where teachers delivered government goods without petitioner's permission and some goods were auctioned at extremely low prices without the permission of the Higher authority and without advertisement against the rules in this regard, it was recorded in the concerned school log book, similarly, during the visit to the government primary school in Jabri, the Government lab tab was found missing, then petitioner reported the corruption of the teachers of both the schools to the Sub-Divisional Officer.

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ADD: REGISTRAR
PHC, ABU OTTABA HENGE

15/9/23

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5. That the sub Divisional officer, respondent No.4 instead to appreciate the petitioner report, colluded with the corrupt teachers to cover up his corruption issued false, fabricated and baseless reliving chit of the petitioner to District Education Officer (Male) Mansehra / respondent No.3 on 09.08.2023. (Copy of reliving chit is annexed as Annexure "B")

6. That on the basis of the Sub Divisional Officer, false reliving chit, the District Education Officer (Male) Mansehra / respondent No.3 issued an explanation letter to petitioner, after reply of petitioner another questionnaire was issued to petitioner, after reply to which, without any inquiry, notice or personal hearing petitioner was arbitrarily transferred to a remote area from Mansehra only for the purpose of adjustment to a person of his own choice in place of the petitioner on 29.08.2023. (Copies of explanation letter, questionnaire, reply and transfer order dated 29.08.2023 are annexed as Annexures "C", "D" & "E" respectively)

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ADD: REGISTRAR
PHC, ABBOTTABAD BENCH

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(18)

7. That the petitioner filed departmental appeal before Appellate Authority / respondent No.2 against the order dated 29.08.2023 passed by District Education Officer (Male) Mansehra respondent No.3 but the departmental Appellate Authority did not decide the same due to which petitioner cannot approach for time being to the Service Tribunal without decision on departmental appeal. (Copy of departmental appeal alongwith postal receipt is annexed as Annexure "F")

8. That this Hon'ble Court has full power to issue direction to respondents to decide the departmental appeal of the petitioner which is pending before respondent No.2 hence this petition, *inter-alia*, on the following grounds amongst other:

GROUND:-

a) That respondent No.2 is duty bound to decide the departmental appeal of the petitioner within 15 days from the date of filing of appeal in accordance with posting transfer

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PHC, ABBOTTABAD BENCH

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policy, but respondent No.2 on the basis of collusion of rest of respondents up-till now did not decide the same, thus the act and action of respondents is illegal, against the law.

(Copy of policy is annexed as Annexure "G")

- b) That respondent No.2 has no right under the law to stop the petitioner lawful rights to approach the competent Court of law by not deciding the departmental appeal of the petitioner.
- c) That the act and action of the respondents is against the Article-4, 10-A and 25 of the Constitution of Islamic Republic of Pakistan 1973 hence not sustainable under the law.
- d) That the respondents have not treated the petitioner in accordance with the law, rules and equity to which he was entitled, thus the whole action and act of the respondents is discriminatory, malafide and against the interest of justice.

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ADD: REGISTRAR
PHC, ABBOTTABAD BENCH

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- e) That there is no other speedy, adequate and efficacious remedy is available to the petitioner except the present Writ Petition.
- f) That, notices have been served upon respondents as per rules. (Copies of notices alongwith postal receipts are annexed as Annexure "H")
- g) That, Court fees stamp paper worth Rs.500/- is attached herewith.
- h) That, the addresses are correctly mentioned in the heading of the Writ Petition.
- i) That any other legal and factual point shall be agitated at the time of argument with the prior permission of this Hon'ble Court.

PRAYER:-

[Handwritten signature]

It is therefore humbly prayed that on acceptance of instant Writ Petition, respondent No.2 may graciously be directed to decide the departmental appeal of the petitioner which is pending before respondent

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**ADD. REGISTRAR
PHC, ABBOTTABAD BENCH**

[Handwritten signature]
15/11/20

No.2. Any other relief which this Hon'ble Court deem fit and appropriate to the circumstances may also be granted to the petitioner in the best interest of justice.

INTERIM RELIEF:

It is further prayed that order No.7721 dated 29.08.2023 issued by respondent No.3 / District Education Officer may graciously be suspended till the final decision of instant Writ Petition.

...PETITIONER

Through Counsel:

Dated:- 14/9 /2023


(SARDAR MUHAMMAD AZEEM)
Advocate High Court Abbottabad

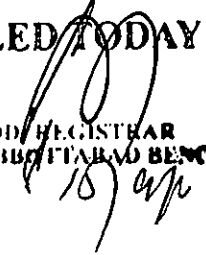
VERIFICATION:-

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

Dated:- 14/9 - /2023


...PETITIONER.



FILED TODAY

ADD. REGISTRAR
PHC, ABBOTTABAD BENCH


JD 22

PESHAWAR HIGH COURT, ABBOTTABAD BENCH.

FORM OF ORDER SHEET

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

DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR.

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E
23

NOTIFICATION

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

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

DIRECTOR

Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

5597-5601

Endst:No: _____ /F.No. 447/SST(M)/Complaints/Mansehra Dated 8/11/2023

Copy forwarded for information to the:-

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

o/c
or

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

Annex: [Redacted]



OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
DISTRICT MANSEHRA

Phone # 0997-382271 Fax # 0997-382244
E-mail Address: edoedu_mansehra@yahoo.com
Facebook Page: www.facebook.com/DEOMMANSEHRA

No 7721 Date 29/8/2023

ADJUSTMENT

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

Note:-

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

Sd/-
DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

Endst: No 7722/24 Estt: (M) Trf: /Dated Mansehra the 29/8/2023.

Copy forwarded to the:-

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

[Signature]
29/8/23
DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

Depot Civil
Mental
Appeal

Decide on
5-19-57

Director
5-19-57

nonon
5-19-57

5-19-57
5-19-57



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

No 7590 /F.No. 436 Vol-II/ADEO (M)/ Transfer

Dated Peshawar the 15-12 /2023

Phone: 091-9225344

Email: estabshmentmale1@gmail.com

To

✓ The District Education Officer
(Male) Mansehra.

Subject: **REQUEST FOR THE APPROVAL OF ASDEOs/ADEOs INTERNAL
ADJUSTMENT**

Memo:

I am directed to refer to your letter No. 7617 dated 24-08-2023 on the subject cited above and to state that adjustment/proposal in r/o the following officers are hereby approved by the competent authority for further necessary action please.

S#	Name & Designation	From	To (posted as)	Remarks
1	Muhammad Akmal ADEO (Sports & Pvt School)	DEO (M) Mansehra	ASDEO (M) Circle at the o/o SDEO (M) Mansehra	A.V. Post
2	Muhammad Ramiz ASDEO (M)	SDEO (M) Baffa Pakhal Mansehra	ADEO (Sports & Pvt School) at the o/o DEO (M) Mansehra	Vice S.No.1

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

Endst; No. _____ /

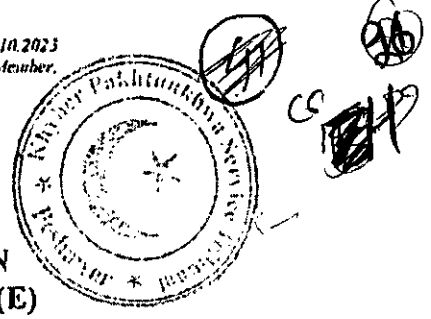
Copy forwarded to the: -

1. PA to Director (E&SE) Local Directorate.
2. Master File.

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

DEO Mansehra letters

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR



BEFORE: KALIM ARSHAD KHANCHAIRMAN
MUHAMMAD AKBAR KHAN... MEMBER (E)

Service Appeal No.1218/2023

Date of presentation of appeal.....23.05.2023
Date of Hearing.....02.10.2023
Date of Decision.....02.10.2023

Mst. Musarrat Begum, SST (G) (BPS-16), ASDEO (F), Circle SD Wazir Uthmanzai, Bannu Under transfer to DEO (F) for further posting.....*Appellant*

Versus

1. The Secretary Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
2. The Director, Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
3. The District Education Officer (F), District Bannu.
4. Mst. Nusrat Bano SST (G) Circle Koti Saddat Bannu, under transfer as ASDEO (F) Circle SD Wazir Uthmanzai, Bannu.

Present:

Mr. Kamran Khan, Advocate.....For the appellant
Mr. Asad Ali Khan, Assistant Advocate General.....For respondents

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER/NOTIFICATIONS DATED 19.05.2023 WHEREBY THE NOTIFICATION DATED 18.05.2023 HAS BEEN RESTORED IN UTTER VIOLATION OF TRANSFER/POSTING POLICY.

JUDGMENT

KALIM ARSHAD KHAN CHAIRMAN: The facts gathered from the memorandum and grounds of appeal are that the appellant is the employee of the Education Department and was serving as SST (G); that in the meanwhile, she was posted against the newly created post of

ATTESTED

M. H. KHAN
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

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ASDEO (Female) vide order dated 11.02.2021; that on 07.04.2023, the appellant was transferred and was placed at the disposal of the DEO (Female) Bannu for further posting. Feeling aggrieved, she filed departmental appeal, which was accepted and the said order was withdrawn. But to the utter surprise of the appellant, the withdrawn Notification dated 07.04.2023 in respect of the appellant as well as private respondent, was also withdrawn by the respondents vide the impugned order dated 19.05.2023, therefore, she filed the instant service appeal.

2. On receipt of the appeal and its admission to full hearing, the respondents were summoned. Respondents put appearance and contested the appeals by filing written reply raising therein numerous legal and factual objections. The defence setup was a total denial of the claim of the appellant.

3. We have heard learned counsel for the appellant and learned Assistant Advocate General for the respondent.

4. The Learned counsel for the appellant reiterated the facts and grounds detailed in the memo and grounds of the appeal while the learned AAG refuted the same by pressing their stances.

5. There is no ifs ands or buts about the fact that the appellant and private respondent, both are SSTs from the General Cadre, therefore, none of the two are having any locus standi to strive for posting in the Management Cadre i.e. for the post of ASDEO (F). Even the civil servant, who is in the relevant grade cannot claim posting against his

ATTESTED
KALIM ARSHAD KHAN
Chairman
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

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Handwritten signature.


choice post rather it is the domain and prerogative of the departmental authorities to post a Civil Servant against any post but proper person against the proper post should be posted. Reliance is placed on 2018 SCMR1411 titled "Khan Muhammad versus Chief Secretary Government of Balochistan and others".


6. This Tribunal and also the Supreme Court of Pakistan in a number of cases has held that proper persons should be posted against their proper cadre which in this case, is posting of an officer of Management Cadre against the Management Post. Proper person against proper post is also the spirit of clause-xiii of the Posting/Transfer Policy of the Government of Khyber Pakhtunkhwa.

7. For the reasons we hold that neither the appellant nor private respondent but in view of the clause xiii Posting/Transfer Policy, the concerned authorities shall ensure the posting of proper person in grade 16 against the post of ASDEO i.e. Management Cadre and not from the Teaching Cadre. The appeal is disposed of in the above terms. Consign.

8. *Pronounced in open Court at Peshawar and given under our hands and the seal of the Tribunal on this 2nd October, 2023.*


KALIM ARSHAD KHAN
Chairman


MUHAMMAD AKBAR KHAN
Member (Executive)

Certified to be true copy

Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

Shuh*

Date of Presentation of Application 19-10-23
Number of Words 3
Copying Fee
Urgent
Total 20/-
Name of Copyist
Date of Completion of 19-10-23
Date of Delivery of 19-10-23

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MANSEHRA

Phone # 0997-382271 Fax # 0997-382244
E-mail Address: edoedu_mansehra@yahoo.com
Face book Page: www.facebook.com/DEOMMANSEHRA

**OFFICE ORDER**

Since SDEO (M) Mansehra has relieved Mr. Rafique Javed from the post of ASDEO (M) circle Mansehra vide his No. 97-09 Dated 09-08-2023, and additional charge has been handed over to Mr. Muhammad Hanif ASDOE (M) circle Shahelia vide his No. 128 Dated 21-08-2023.

Since the work is suffering in the circle of the Manshra due to non-presence of proper ASDEO as such to make service delivery effective and ensure the good governance and keeping in view the problem of circle Mansehra,

The following internal arrangement is hereby made in the best interest of public service with immediate effect.

S#	Name & Desig:	From	To	Remarks
1.	Mr. Muhammad Akmal ADEO (Sport & Pvt School)	DEO (M) Mansehra	ASDEO (M) Circle Mansehra office of the SDEO (M) Mansehra	A.V.Post
2.	Mr. Muhammad Ramiz ASDEO (M)	SDEO (M) Baffa Pakhal	ADEO (Sport & Pvt School) office of the DEO (M) Mansehra	Vice S.No. 1

Note:

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

Sd/-
DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

Endst: No 7651-581
Copy for information to the:

Dated 25/8/2023

1. PA to Director Elementary & Secondary Education Department Peshawar.
2. Director District Account Office Mansehra.
3. District Monitoring Officer (EMA) Mansehra.
4. A.D EMIS Branch Local office.
5. Budget & Account Branch Local office.
6. SDEO (M) Mansehra & Baffa.
7. Official Concerned.
8. Office Order File.

[Signature]
DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

[Handwritten initials]

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (MALE) MANSEHRA

E-mail Address: slcomminnsehra@gmail.com

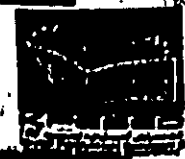
Phone No, 0997-800122

1793

/Explanation/

Dated

13/05/2023



Handwritten marks and scribbles in the top right corner.

Handwritten signature: *Amjad*

To

The District Education Officer,
(Male) Mansehra.

Subject:

**REPORT AGAINST MR. RAFIQUE JAVED ASDEO CIRCLE
MANSEHRA.**

Memo:

It is brought to your kind notice that Mr. Faraz Ahmed, Ex-PST GPS Mera Amjid All Circle Mansehra was died on 03.04.2022 & pay has not been stop till date due to non-submission the report of death of teacher concerned by ASDEO Circle Mansehra being field officer which is great negligence in the part of ASDEO Concerned, it is further added that the ASDEO Circle Mansehra also shows misconduct, misbehave, lack of interest and irresponsibility with his job..

It is therefore requested that the necessary disciplinary action may please be taken against the above mentioned officer in the best interest study of little kids and smooth running of Schools, under the relevant Rules.

o/c

SUB DIVISIONAL EDUCATION OFFICER:
(MALE) MANSEHRA

Handwritten initials or signature at the bottom right.



OFFICE OF THE SUB-DIVISIONAL EDUCATION OFFICER (MALE) MANSEHRA

Email address: sdeonmanshra@gmail.com

Phone No: 0997-300122

No: 116

Dated 12-08-2023



Handwritten notes and signatures at the top right corner.

To

The District Education Officer
(Male) Mansehra.

Subject: PROPOSAL FOR ASDEO CIRCLE MANSEHRA

Respect Sir,

It is requested that I have continuously submitted written complaints against Mr. Rafique Javed SST/ ASDEO (Teaching Cadre) Circle Mansehra Sub Division Mansehra regarding his deficiency, non-co-operative & non professionalism. He is creating allot of problems for the SDEO (M) Office Mansehra which badly effect the smooth running of the Office. He is unfit for the job of ASDEO.

It is therefore requested that Mr. Sajid Hussain Shah (SST-G) GMS Chore Banda may kindly be posted as ASDEO Circle Mansehra by replacing Mr. Rafique Javed in the best interest of public service.


Sub Divisional Education Officer
(Male) Mansehra.

12-08-2023

Handwritten signature at the bottom right corner.

AUTHORITY LETTER.

It is to certify that Mr. Mubashir Ahmed, legal representative of District Education Office, Mansehra is hereby authorized to submit para wise comments in case titled "Rafiq Javed Versus Govt. of KPK" service appeal No. 2444/2023.


DISTRICT EDUCATION OFFICER

(MALE) Mansehra