BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
CAMP COURT SWAT.

SERVICE APPEAL NO. 1402/2014

Date of institution ... 05.11.2014
Date of judgment ... 05.04.2017

Ghulam Hussain S/o Bakht Zameen Khan,
R/o Kanju, Gharib Abad District Swat.

... (Appellant)

VERSUS

1. Secretary Government of Khyber Pakhtunkhwa, Education Department at Peshawar.
2. Director Education, Khyber Pakhtunkhwa at Peshawar.
3. District Education Officer (Male) Swat at Saidu Sharif Swat.
4. Abdul Ghafar S/o Farooq Shah, resident of Damghar Tehsil Kabal District Swat (GMS Aligrama District Swat).

... (Respondents)

APPEAL UNDER SECTION-4 OF SERVICE TRIBUNAL ACT, 1974, AGAINST THE ORDERS OF RESPONDENT NO. 3, THROUGH THE IMPUGNED OFFICE ORDERS ENDST NO. 65-68/NST/APPTT:2014 DATED 02.09.2014 WHEREBY APPELLANT HAS BEEN TRANSFERRED FROM G.M.S ALIGRAMA TO G.M.S MAHAK SWAT AND THAT OF ENDST NO. 1454-1518/80/APPOINTMENT/ADHOC/NTS DATED 30.09.2014 VIDE WHICH RESPONDENT NO. 4 HAS BEEN APPOINTED/POSTED AT GMS ALIGRAMA SWAT.

Mr. Tariq Aziz, Advocate. .. For appellant.
Mr. Muhammad Zubair, Senior Government Pleader .. For respondents.

MR. MUHAMMAD AMIN KHAN KUNDI .. MEMBER (JUDICIAL)
MR. AHMAD HASSAN .. MEMBER(EXECUTIVE)

JUDGMENT

MUHAMMAD AMIN KHAN KUNDI, MEMBER: This service appeal has been filed against the order dated 02.09.2014 whereby the District Education Officer

(Male) has transferred the appellant from Government Middle School Aligrama to Government Middle School Mahak Swat and thereafter private respondent No. 4 namely Abdul Ghafar, was appointed/posted at Government Middle School Aligrama vide order dated 30.09.2014.

2. Learned counsel for the appellant contended that the impugned order dated 02.09.2014, whereby the appellant was transferred and order dated 30.09.2014 passed by respondent No. 3 regarding appointment/posting of respondent No. 4 namely Abdul Ghafar was illegal, unconstitutional and against the principles of natural justice. It was further contended that the appellant had not completed tenure in Government Middle School Aligrama, when the impugned order was passed by respondent No. 3 nor any prior notice was given to him. It was further contended that there were no adverse remarks against the appellant therefore the impugned order was illegal and liable to be set-aside and prayed for acceptance of the appeal.

3. On the other hand learned Senior Government Pleader for respondents opposed the contention of learned counsel for the appellant and argued some posts of AT were advertised by the respondents in Daily Mashriq on 08.01.2014 for one year adhoc school based appointment which included post of AT at GMS Aligrama. As the post at the above school was earmarked for school based appointment, hence the appellant was transferred to GMS Mahak. He further argued that transfer of the appellant was a routine matter and as such it could not be termed as penalty. That Mr. Abdul Ghafar respondent No. 4 had already been appointed through NTS at GMS Aligrama for the period of one year so the appellant cannot be adjusted in the said school. In case respondent No. 4 was transferred his services were liable to be terminated. It was vehemently contended that the appellant had no vested right under

the law to challenge the transfer order passed by the competent authority, therefore, the appeal being devoid of any merit be dismissed with costs.

4. We have heard the arguments on both the sides and gone through to the record.

5. Perusal of the record reveals that the appellant was serving in Government Middle School Aligrama and the competent authority had transferred him from the said School to Government Middle School Mahak Swat vide order dated 02.09.2014. The record further reveals that after transfer of the appellant the competent authority had also appointed private respondent No. 4 namely Abdul Ghafar on 30.09.2014 for one year adhoc school based appointment at GMS Aligrama, hence the appellant was transferred to GMS Mahak and was now there. That the transfer of the appellant was a routine matter, in case appellant is brought back to GMS Aligrama services of private respondent No. 4 will have to be terminated, as he was appointed on adhoc base for a period a one year. There is no illegality in the impugned order and appellant has no vested right to challenge the transfer order passed by the competent authority, therefore, we see no merit in the appeal, hence the same is dismissed. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
05.04.2017

(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

(AHMAD HASSAN)
MEMBER

1402/14

07.12.2016 None present for the appellant. Mr. Shafiqur Rahman, ADO alongwith Mr. Muhammad Zubair, Sr.GP for official respondents present. Due to non-submission of rejoinder and incomplete bench arguments could not be heard. To come up for rejoinder and final hearing on 05.4.2017 before D.B at camp court, Swat.

Chairman
Camp court, Swat

05.04.2017 Appellant alongwith his counsel present. Mr. Mr. Muhammad Saeed, Subject Specialist with Mr. Muhammad Zubair, Senior Government Pleader for respondents also present.

Vide our detailed judgment of today consisting of three pages. We see no merit in the appeal hence the same is dismissed. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
05.04.2017

(AHMED HASSAN)
MEMBER

(MUHAMMAD AMIN KHAN KUNDI)
MEMBER
CAMP COURT SWAT

12.01.2016

Appellant with counsel and Mr. Muhammad Saeed, S.S alongwith Mr. Muhammad Zubair, Sr,GP for official respondents No.1 to 3 present. Record revealed that private respondent No. 4 has not been proceeded ex-parte and is not available before the Tribunal today. Let a notice be served on private respondent No.4 for submission of his written reply on 09.03.2016 before S.B at Camp Court Swat.

Chairman
Camp Court Swat

09.03.2016

None present for appellant. Mr. Farooq Ahmad, AGP for official respondents No. 1 to 3 present. None present for private respondent No.4 despite issuance of notice through registered post. Proceeded ex-parte. The appeal is assigned to D.B for final hearing for 5.9.2016 at Camp Court Swat.

Chairman
Camp Court Swat

05.09.2016

Appellant in person and Mr. Muhammad Zubair, Sr.GP present. Appellant seeks adjournment to file rejoinder. Adjourned for rejoinder and final hearing to 07.12.2016 before the D.B at camp court, Swat.

Member

Chairman
Camp Court, Swat

5 6.5.2015 Appellant in person and Mr. Muhammad Zubair, Sr. G.P for official respondents No.1 to 3 present. None present for private respondent No.4. The learned Sr.G.P requested for adjournment. To come up for written reply on 6.7.2015 at Camp Court Swat. Fresh notice be issued to private respondent No.4 for the date fixed.

Chairman
Camp Court Swat

6 6.7.2015 Appellant in person and Mr.Muhammad Saeed, S.S alongwith Mr. Muhammad Zubair, Sr. G.P for official respondents present. Written reply submitted. The appeal is assigned to D.B for rejoinder and final hearing for 6.10.2015 at camp court Swat.

Chairman
Camp Court Swat

6.10.2015 Appellant in person and Mr.Muhammad Saeed, S.S alongwith Mr.Muhammad Zubair, Sr.G.P for official respondents present. Rejoinder submitted. Due to non-availability of D.B arguments could not be heard. To come up for final hearing before D.B on 12.01.2016 at Camp Court Swat.

Chairman
Camp Court Swat

3. 04.02.2015 Appellant with counsel present. Argued that vide impugned order dated 2.9.2014 appellant was prematurely transferred from GMS Aligrama to GMS Mahak, a far-flung area with malafide intention and to accommodate newly appointed Arabic Teacher namely Abdul Ghafar (respondent No.4). That the appellant has already served for a period of about 10 years in the far-flung area and, therefore, his premature transfer was against the norms of justice, discriminatory and therefore unwarranted. That against the impugned order departmental appeal was preferred on 13.09.2014 which remained un-responded within the statutory period and hence the present appeal.

Points urged need further consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply for 7.4.2015 at camp court Swat.

Chairman
Camp Court Swat

4. 7.4.2015 **Appellant present in person. Notices could not be issued due to non-deposit of security and process fee. Appellant requested for further time. Security and process fee be deposited within three days, where-after notices be issued to the respondents for written reply/comments for 6.5.2015 at camp court Swat.**

Appellant Deposited
Security & Process Fee

Chairman
Camp Court Swat

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. 1402/2014

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	15/12/2014	The appeal of Mr. Ghulam Hussain resubmitted today by Mr. Tariq Aziz Advocate may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing. REGISTRAR
2	16-1-2015	This case is entrusted to Touring Bench Swat for preliminary hearing to be put up there on 4-2-2015. CHAIRMAN

BEFORE THE HON'BLE SERVICE TRIBUNAL KHYBER PAKHTUN KHWA, PESHAWAR AT GULKADA, SAIDU SHARIF SWAT.

Service Appeal No 1402 *of 2014*

Ghulam Hussain ..... Appellant.

VERSUS

Secretary Govt of K.P.K & others .....Respondents

INDEX

S. No	*Description*	*Annexure*	*Pages No*
1.	*Appeal with certificate.*	-	1-6
2.	*Affidavit*	-	7
3.	*Addresses of parties*	-	8
4.	*Application for suspension of operation of impugned Orders*		9
5.	*Copy of appointment Order dated 24-03-2005*	A	9(a),9(b)
7.	*Copies of transfer Orders*	B	10-12
8.	*Copies of Advertisement dated 08-01-14 & list of respondent No 3 for vacancies*	C	13-15
9.	*Copy of impugned transfer Order dated 02-09-2014*	D	16-16(b)
10.	*Copy of departmental appeal/ application dated 13-09-2014*	E	17
11.	*Order No 1575/ST,dated 5-11-2014 by Registrar Honorable Tribunal k.p.k, Peshawar.*	F	18
12.	*Wakalat Nama*	-	19

Petitioner
Through Counsels

TARIQ AZIZ Advocate, High Court & SHAKIRULLAH Advocate
Office: Azeem khan plaza 2nd floor room no C.9 makanbagh mingora District Swat.
Cell #: 03469693740,03139663763.

(1)

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUN KHWA, PESHAWAR, CAMP COURT AT GULKADA, SAIDU SHRAIF SWAT.

Service Appeal No 1408 *of 2014*

Ghulam Hussain S/O Bakht Zameen khan resident of Kanju, Gharib Abad District Swat.....(Appellant)

E.P.P. Peshawar
Diary No. 1335
Dated 05/11/2014

Versus

(1) *Secretary Government of Khyber Pakhtoon Khwa, Education Department at Peshawar.*
(2) *Director Education, Khyber Pakhtoon khwa at Peshawar.*
(3) *District Education Officer (Male) Swat at Saidu Sharif Swat.*
(4) *Abdul Ghafar S/O Farooq Shah, resident of Damghar Tehsil kabal District Swat (GMS Aligrama District Swat).*

ex parte 9.3.15

.....*(Respondents)*

Appeal u/s 4 of Service Tribunal Act 1974,against the Orders of Respondent No 3, through the impugned Office Orders Endst No 65-68/NTS/Apptt:2014 dated 02-09-2014 whereby Appellant has been transferred from G.M.S Aligrama to G.M.S Mahak Swat and that of Endst No 1454-1518/80/Appointment /Ad hoc/NTS dated 30-09-2014 vide which Respondent No 4 has been appointed/ posted at GMS Aligrama Swat.

5/11/2014

Re-submitted to-day and filed.

15/12/14

Prayer: *On acceptance of this appeal the impugned Orders Endst No 65-68/NTS/Apptt:2014 dated 02-09-2014 and that of Endst NO1454-1518/AT/Appointment/Ad hoc/NTS/dated 30-09-2014 passed by Respondent No 3, be declare*

illegal, unconstitutional, without lawful Authority, against the Services Rules and Regulations, may kindly be setaside and the Appellant may kindly be allowed to retain his service/ Position as A.T (B.P.S=15) in G.M.S Aligrama Swat with all its existing perks and privileges.

Respectfully Sheweth, The Appellant Submits as under;

(1) That the Appellant was initially appointed on 24/03/2005 as Arabic Teacher (AT=Post, Contract Basis) at Government Middle School Bayoon District Swat. Order dated 24-03-2005 is attached as annexure..... "A".

(2) That the Appellant served this Honorable department and transferred to various Schools i-e
From GMS Bayoon kalam to GHS Shawar, Matta Swat dated 15-05-2007,
From GHS Shawar Matta Swat to GHS Qalagay Swat dated 10-11-2008,
From GHS Qalagay to G.M.S Aligrama dated 21-05-2013, Copies of Office Order Endst: No 9193-9211/A-12/ Apptt:AT (M) dated 21-03-2005, Office Order Endst: No 8364-66/A-12/AT dated 15-05-2007, Office Order Endst: No 2828-31/A-12/AT dated 10-11-2008 & Office Order Endst: No 9761-63 dated 21-05-2013 are attached as annexure....."B".

(3) That an advertisement dated 08-01-2014 was issued in Daily Mashriq by Respondent No 3. As per advertisement and the list of vacancies , the post of Appellant was shown vacant and it was mentioned in the said list on serial No 321043 that newly appointed teacher through N.T.S will have to be appointed at the same School. In fact there was no vacancy as the Appellant was already serving on the said post (A.T). Copy of Advertisement dated 08-01-2014 with list of Respondent No 3 is attached is attached as annexure..... "C".

(4) That on 02-09-2014 Respondent No 3 issued the

impugned Transfer through Office Order Endst: No 65-68/NTS/Apptt:2014 whereby the Appellant has been transferred From G.M.S Aligrama to G.H.S Mahak Swat. Copy of Office Order Endst: No 65-68/NTS/Apptt:2014 dated 02-09-2014 of Respondent No 3 is attached as annexure..... "D".

(5) That the Appellant bonafidely filed departmental Appeal/application against the said impugned transfer Office Order on 13-09-2014 to Respondent but the Respondent No 3 verbally rejected. Copy of Departmental appeal/ application dated 13-09-2014 Dispatch No 2580 is attached as annexure ....."E".

(5) That later on the respondent No 4 was illegally and unlawfully appointed in G.M.S Aligrama vide Office Order Endst: No 1454- 1518/AT/ Appointment /Adhoc/NTS dated 30-09-2014 passed by Respondent No 3.Copy of impugned Appointment Order Endst: No 1454- 1518/AT/ Appointment /Adhoc/NTS dated 30-09-2014 is attached as annexure ....."F".

(7) That the Appellant filed an appeal No 1333 before This Honorable Tribunal dated 05-11-2014 which was returned through Order No 1575/ST dated 5-11-2014. Copy of Order of Registrar Honorable Tribunal No 1575/ST dated 5-11-2014 is attached as annexure ....."G".

(8) That along with so many reasons the impugned Transfer/ appointment Orders through OfficeOrders Endst: No 65-68/NTS/Apptt:2014 dated 02-09-2014 and that of Endst No 1454-1518/AT/ Appointment/Adhoc/NTS 30-09-2014 are illegal, unconstitutional, against the services rules, regulations and liable to be set-aside inter alia on the following grounds.

GROUNDS

(i) That the impugned Orders dated 02-09-2014 and that of 30-09-2014 are illegal, unconstitutional, against the principle of natural justice, against the services Laws

and Regulations hence not tenable in the eyes of law.

(ii) *That their was no vacancy in the said school (GMS Aligrama Swat), while announcing N.T.S posts in advertisement dated 08-01-2014 in Daily Mashriq and in the list of school by Respondent No 3, on serial no 321043, it has been shown vacant. It is settled principle of law that no one should be penalized by the act of the Authority or Court.*

(iii) *That while issuing the impugned Order Rationalization Policy and Rules Regulations have been violated, therefore the impugned transfer Order is not based on privileged Law, equity, public interests and natural justice.*

(iv) *That the Appellant has not completed his tenure beside it no prior notice of impugned transfer Order has been given to Appellant, hence un warranted.*

(v) *That the new station to which the Appellant has been posted is far flung area and its transport (communication) system is worse.*

(vi) *That the impugned Order is favorable to Respondent No 4 and some other persons on the Cost of petitioner.*

(vii) *That till date there exist no adverse remarks against the Appellant and the Appellant kept unblemished record in the entire Service career.*

(viii) *That it is in the interest of justice to adjust any other teacher in G.M.S Mahak (holding the same position) and*

the Appellant may kindly be retained to serve in G.M.S Aligrama Swat.

It is therefore kindly requested that On acceptance of this appeal the impugned transfer Order through Office Order Endst No 65-68/NTS/Apptt:2014 dated 02-09-2014 and that of Endst NO1454-1518/AT/Appointment/Ad hoc/NTS/ dated 30-09-2014 passed by Respondent No 3 Swat may kindly be set-aside/ and the Appellant may kindly be allowed to retain his service/ Position as A.T, (BPS=15) in the G.M.S Aligrama with all its existing perks and privileges.

Appellant

Ghulam Hussain
Through Counsels

Tariq Aziz Advocate (High Court)
Mobile No =03469693740
Shakirullah Advocate
Mobile No=03139663763
Office; Azeem khan plaza, room no c-9, 2nd floor, mingora, swat.

CERTIFICATE

It is certified that no such like other appeal(except appeal No 1333 dated 05-11-2014 which was returned in original vide Order No 1575 dated 05-11-2014) of the same subject matter has earlier been instituted by the appellant and this is the first ever appeal against the impugned

Office Orders as per information provided by the appellant to us.

Ghulam Hussain

Through

Tariq Aziz Advocate (High Court)
Shakirullah Advocate

Before the Service Tribunal Khyber Pakhtoon Khwa, Peshawar, Camp Court at Gulkada, Swat.

Service Appeal No_____of 2014

Ghulam Hussain S/O Bakht Zameen khan resident of Kanju, Gharib Abad District Swat.....(Appellant)

Versus

Secretary Government of K.P.K and others... (Respondents)

AFFIDAVIT

It is solemnly affirm and declare on oath that contents of the above titled appeal are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Honorable Tribunal.

ATTESTED

TARIQ AZIZ ADVOCATE
District Courts Swat
No 14 12/12/14
OATH COMMISSIONER

Deponent

Ghulam Hussain

Before the Service Tribunal Khyber Pakhtoon Khwa, Peshawar, Camp Court at Gulkada, Swat.

Service Appeal No_____of 2014

Ghulam Hussain S/O Bakht Zameen khan resident of Kanju, Gharib Abad District Swat.....(Appellant)

Versus

Secretary Government of K.P.K and others.....(Respondents)

MEMO OF ADDRESSES

Addresses of Appellant:

Ghulam Hussain S/O Bakht Zameen khan resident of Kanju, Gharib Abad District Swat.
CNIC No = 15602-0411517-3
Mobile No = 03018061405

Addresses of Respondents:

(1) *Secretary Government of Khyber Pakhtoon Khwa, Education Department at Peshawar.*
(2) *Director Education, Khyber Pakhtoon khwa at Peshawar.*
(3) *District Education Officer (Male) Swat at Saidu Sharif Swat.*
(4) *Abdul Ghafar S/O Farooq Shah,resident of Damghar Tehsil kabal (GMS Aligrama) District Swat.*

Appellant

Ghulam Hussain

Through Counsels

***Tariq Aziz** Advocate (High Court)*
Mobile No =03469693740
***Shakirullah** Advocate*
Mobile No=03139663763
Office; Azeem khan plaza, room no c-9, 2nd floor, mingora, swat.

(9)

Before the Service Tribunal Khyber Pakhtun Khwa, Peshawar, Camp Court at Gulkada, Swat.

Service Appeal No_____of 2014

Ghulam Hussain S/O Bakht Zameen khan resident of Kanju, Gharib Abad District Swat.....(Appellant)

Versus

Secretary Government of K.P.K and others.....(Respondents)

Application for suspension of operation of impugned Orders dated 02-09-2014 and that of 30-09-2014 passed by respondent No 3 till the disposal of above mentioned Appeal.

Respectfully Sheweth,

(1) That the above titled Appeal is being filed today in this Honorable Tribunal in which no date for presentation has yet been fixed.

(2) That the Applicant/ Appellant is aggrieved from the impugned Orders which are not on the basis of privileged Law and justice and their is a good prima facie case in favour of Applicant and he is sanguine about its success.

(3) That balance of convenience also lies in favour of Applicant.

(4) That grounds of appeal be considered as grounds for this application.

(5) That if the impugned Orders have not been suspended, the petitioner will have to suffer irreparable loss and resultantly the object of this appeal to be in fructuous.

It is therefore humbly prayed that on acceptance of this application the impugned Orders mentioned above may kindly be suspended till the disposal of this appeal.

Applicant/Appellant

Ghulam Hussain

Through Counsels

Tariq Aziz Advocate (High Court)
Mobile No =03469693740
Shakirullah Advocate

First Appointment letter

9(A) Annexure "A"

OFFICE OF THE EXECUTIVE DISTRICT OFFICER SCHOOLS AND LITERACY SWAT AT GUL KADA.

OFFICE ORDER

The District Co-Ordination Officer Swat has been placed to approve the selection /appointment (being appointing authority) of the following AT (Male) candidates against AT post on contract basis in BPS-No.09 (2410-145-6760) plus usual allowances as admissible under the rules, in school noted against each with effect from the date of their taking over charge in the interest of public service on terms and conditions given below:-

S.No	Name/Designation/Address	Total Marks	Name of School where Adjusted	Remarsk
1	Mr.Ghulam Hussain S/O Bakht Zamin R/O Kanju	69.08	GMS Bayoon Swat	Apptt:on contract basis
2	Mr.Abdus Salam S/O Muhammad Yousaf R/O Matta Swat	68.60	GHS Kedam Swat	--do--
3	Mr.Samiullah Jan S/O Amir Rahman R/O IslamPur Swat	66.99	GMS Ramali Swat	--do--
4	Mr. Muhammad Tayab S/O Muhammad tahir R/O Matta	66.73	GMS Utal Swat	--do--
5	Mr.Mian Karim Bakshah S/O Mian Muner. PTC GPS Figara Swat	65.73	GMS Dabanagay Swat	Apptt:on Perm: basis
6	Mr.Sakhi Sardar S/O Mian Sahib Jan R/O Gulibagh	50.11	GMS Anakar Swat	Apptt:on contract basis in Deceased quota
7	Mr. Abdur Rouf S/O Mehmood Khan R/O Shalpin	49.74	GMS Takhar	--do--
8	Mr.Muhammad Yousaf S/O Abdul Ghafoor R/O Pishtonay Swat	49.36	GMS Birwal Swat	--do--

T.C

5/11/2014

TERMS AND CONDATIONS

1. No TA / DA is allowed.
2. Charge report should be submitted to all concerned.
3. All the certificates / degrees will be verified from the concerned authority. In case any certificate/ degree found incorrect/ Un-verified the appointment order of the candidate should be automatically cancelled.
4. The original certificates / degrees of the candidates should be checked before handing over charge to the candidate concerned.
5. The contract candidate will sign an agreements form before taking over charge
6. They will be governed under terms and conditions as prescribed by the Government.
7. The appointments /posting of contract teachers in the schools is no transferable.
8. The contract teacher will not consider for regularization at any time.
9. The services of contract teacher can be terminated at any time in case their performance is found un-satisfactory and they will be preceded under special power ordinance 2000.
10. Their appointments are purely temporarily and contract and liable to be terminated with out assigning any reason.
11. They will produce health and age certificate from the Medical superintendent/Civil surgeon concerned.
12. They should join their post within 30 days from the issue of this order.

9(a)

13. Their service will be liable to termination on one months notice from either side. In case of resignation without notice their one months pay/allowances if any will be forfeited to government.

(SHAHEB HASSAIN AFRIDI)
DISTRICT CO-ORDINATION OFFICER
SWAT AT GUL KADA

Endst: No.9193-9211/ A-12 / Appt: AT(M) Dated: - 24/03/2005.

Copy to:-

1. The Director Schools and Literacy NWFP, Peshawar.
2. The District Co-ordination Officer Swat at Gul Kada with reference to his No. 2910-11/51/DCO/Estb: dated 24/03/2005.
3. The District Accounts Officer Swat at Saidu Sharif.
4. The Executive District Officer (S&L) swat at Gul Kada.
5. The Deputy District Officer (S&L) Male and Female Swat at Gul Kada.
6. The ADO (B&A) local Office.
7. The Head Mistress concerned.
8. The ADO (Establishment) Local Office.
9. The superintendent Local Office.
10. The P.A to the EDO Local Office.
11. The candidate concerned.

EXECUTIVE DISTRICT OFFICER
SCHOOLS AND LITERACY SWAT

T.C. 5/11/2014

Hakim Ali
Junior Clerk O/O EDO(S&L) Swat

2nd order (10) Annexure "B" pages 10-12

OFFICE OF THE EXECUTIVE DISTT:OFFICER(S)AND LIT:SWAT:-.

OFFICE ORDER:-.

Consequent upon granted ban relexation from the Hon,able Minister for Education Mr,Ghulam Hussain AT working BPS No.09 xxxxxxxxxxxxxxxx Govt:Middle School Baoyoon Swat is hereby transrerred to GHS Shawar Distt:Swat against Vacant AT post on his own pay and scale from the date of his taking over charge in the interest of public service.

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

(GHULAM AKBAR KHAN)
EXECUTIVE DISTT:OFFICER(S)
AND LIT:SWAT.

Endst:No. 8364-66/A-12/AT Dated the 15/5/2007:-

Copy to:-

1. The Headmasters Concerned School.
2. The Distt:Accounts officer,Swat.
3. The teacher Concerned.

T.C
5/11/2014

EXECUTIVE DISTRICT OFFICER(S)
AND LIT:SWAT.

2nd order

(11)

Office Order.

As approved by the District Coordination officer, Swat No.14137/54/A/DCO/ dated the 8.11.2018. The following ATs are hereby transferred the schools noted against each from the date of their taking over charge on their own pay and scale in the interest of public service.

Note:-

S.No.	Name of teacher:-	From:-	To:-	Remarks
1.	Mr Muhammad Saeed AT	GHS Qalagay	GMS Nawagai V.S.No.1	
2.	Mr Umer Zarin AT	GMS Nawagai	GHSS barikot, Swat against Vacant AT post.	
3.	Mr, Ghulam Hussain AT	GMS Shewar	GMS Qalagay V.S.No.1	

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

(SHAH AFZAL KHAN)
ASSISTANT DISTRICT OFFICER
HEADQUARTER & CIVIL COURT :SWAT.

Endst:No. 28280-31 /A-19/AT dated the 10/11/2018.

T.C
5/11/2018

Copy forwarded to:-

1. The Headmaster/Principal Concerned Schools.
2. The District Accounts officer, Swat.
3. The teacher Concerned.
4. P.A to the DCO Local office.

ASSISTANT DISTRICT OFFICER
HEADQUARTER & CIVIL COURT :SWAT.

(11)

BETTER COPY

OFFICE OF THE EXECUTIVE OFFICER ELEMENTRY AND SECOUNTARY SWAT:-

OFFICE ORDER;-

As approved by the District coordination officer,swat NO 14137/51/A/DCO/Estabb;dated The 8.11.2008. The following AT teacher are hereby transferred the schools noted against each from the date of their taking over charge on their own pay and scale in the interest of public Service.

S.NO.Name of teachers;	From;	To;	Remarks
1.Mr Muhammad Saeed AT	GHS galagy	GMS Nawagei v.s.no.2	
2.Mr umer zarin AT	GMS nawagai	GHSS Barikot,swat. .Aginst AT post.	
3.Mr Ghulam Hussain AT	GHS shawaran	GHS Qalagay v.s.No1	

Note-1 no TA/DA is allowad.

2.Charges report should be submitted to all concerned.

(SHER AFZAL KHAN)

EXECUTIVE DISTRICT OFFICER

ELEMENTARY & SECY: EDU:SWAT.

Endst: No 2828-31/A-12/AT Dated the 10/11/2008.

Copy forwarded to :-

1. The Headmaster/Principal concerned Schools.
2. The District Accounts Officer, Swat.
3. The teacher concerned.
4. P.A to EDO Loxal Office.

ASSISSTANT DISTRICT OFFICER

ELEMENTARY & SECONDARY Edu; Swat.

23 (12)

OFFICE OF THE DISTRICT EDUCATION OFFICER MALE SWAT AT GULKADA

OFFICE ORDER.

The District Education officer (M) swat being a competent authority the following transferred of ATs Male swat the schools and BPS noted against each with immediate effect in the best interest of public service.

S.No.	Name of teacher & BPS	From	To	Remarks
01	Midrarullah S.AT B-16	GHS Qandill	GHS Qalagay	V.S.No.02
02	Mr Ghulam Hussein AT B-15	GHS Qalagay	GMS Aligrama	a.v.post.

(GUL ZAMAN KHAN)
DISTRICT EDUCDATION OFFICER
MALE SWAT.

Endst:No. 9761-63 / dated the 21/5/ /2013

Copy forwarded to:
01. The principal concerned schools
02. The District Accounts officer,swat.
03. The teachers concerned.
04. P.A to the DEO(M)local office.

T.C,
5/11/2014

DISTRICT EDUCDATION OFFICER
MALE SWAT.

(13)

Annexure "C"
page 13 - 15

INF(P) 97 Also available on www.khyberpakhtunkhwa.gov.pk

درخواستیں مطلوب ہیں

محکمہ ایلیمنٹری و سیکنڈری ایجوکیشن ضلع سوات کے زیر انتظام مردانہ سکولوں میں مندرجہ ذیل کیڈرز کی خالی آسامیوں پر ایڈہاک سکول بیسڈ (Adhoc School Based) تقرریوں کے لئے ضلع سوات کے مکونی اہل امیدواروں سے مجوزہ فارم پر مورخہ 20 جنوری 2014 تک درخواستیں مطلوب ہیں۔

درخواست فارم این ٹی ایس NTS کی ویب سائٹ (http://www.nts.org.pk) پر دستیاب ہے۔ یاد رہے کہ نامکمل اور مقررہ تاریخ گزرنے کے بعد موصول ہونے والی درخواستوں پر غور نہیں کیا جائیگا

نمبر شمار	نام آسامی	تعلیمی قابلیت	عمر کی حد
1	سی ٹی BPS-15	بی اے، بی ایس سی یا مساوی قابلیت کسی بھی تسلیم شدہ یونیورسٹی سے بمعہ سی ٹی سرٹیفکیٹ یا 2 سالہ ایسوسی ایٹ ڈگری ان ایجوکیشن کسی بھی تسلیم شدہ یونیورسٹی سے یا 18 (اٹھارہ) ماہ کا ڈپلومہ ان ایجوکیشن	18 تا 35 سال
2	ڈی ایم BPS-15	بی اے، بی ایس سی کسی بھی تسلیم شدہ یونیورسٹی سے بمعہ ایک سالہ ڈرائنگ ماسٹر کورس کا سرٹیفکیٹ	18 تا 35 سال
3	پی ای ٹی BPS-15	بی اے، بی ایس سی یا مساوی قابلیت کسی بھی تسلیم شدہ یونیورسٹی سے بمعہ ایک سالہ جونیئر ڈپلومہ ان فیزیکل ایجوکیشن کورس یا آرمی سے مساوی سرٹیفکیٹ یا دیگر مساوی قابلیت	18 تا 35 سال
4	اے ٹی BPS-15	ایس ایس سی (سیکنڈ ڈویژن) کسی بھی تسلیم شدہ بورڈ سے بمعہ شہادۃ العالیہ فی العلوم العربیہ والاسلامیہ کسی مستند مطمئنہ الوفاق المدارس یا دارالعلوم سیدو شریف سوات' دارالعلوم چارباغ سوات' دارالعلوم چترال' دارالعلوم دروش چترال یا کسی بھی تسلیم شدہ یونیورسٹی سے عربی میں سیکنڈ کلاس ماسٹر ڈگری	20 تا 35 سال
5	ٹی ٹی BPS-15	ایس ایس سی (سیکنڈ ڈویژن) کسی بھی تسلیم شدہ بورڈ سے بمعہ شہادۃ العالیہ کسی منظور شدہ تسلیم الوفاق المدارس یا دارالعلوم سیدو شریف سوات' دارالعلوم چارباغ سوات' دارالعلوم چترال' دارالعلوم دروش چترال اور کوئی دیگر دارالعلوم جو گورنمنٹ کے زیر انتظام ہو اور اس کا نوٹیفکیشن حکومت نے وقتاً فوقتاً جاری کیا ہو یا سیکنڈ ڈویژن ایم اے اسلامیات کسی بھی تسلیم شدہ یونیورسٹی سے۔	20 تا 35 سال
6	قاری BPS-12	انٹرمیڈیٹ بمعہ حفظ القرآن اور سند قرات کسی بھی منظور شدہ ادارے سے	18 تا 35 سال
7	پی ایس ٹی BPS-12	انٹرمیڈیٹ یا مساوی سرٹیفکیٹ کسی بھی تسلیم شدہ بورڈ سے بمعہ پرائمری سکول ٹیچر سرٹیفکیٹ / ڈپلومہ ان ایجوکیشن، کسی مستند ادارے سے یا ایس ایس سی (سیکنڈ ڈویژن) کسی بھی منظور شدہ بورڈ سے بمعہ 2 سالہ ایسوسی ایٹ ڈگری ان ایجوکیشن کسی بھی تسلیم شدہ یونیورسٹی سے	18 تا 35 سال

سلیکشن کریٹیریا: (Selection Criteria)

اساتذہ کے سلیکشن کا پیمانہ درج ذیل ہیں۔ کل 200 نمبرات کی تقسیم اس طرح سے کی جائیگی۔

ا۔ سکریننگ ٹیسٹ بذریعہ NTS = 100 نمبر ب۔ تعلیمی قابلیت = 100 نمبر جس کی مزید تقسیم اس طرح ہوگی

تعلیمی قابلیت	کل نمبر
ایس ایس سی	حاصل کردہ نمبر x20 / تقسیم کل نمبر
ایف اے / ایف ایس سی	حاصل کردہ نمبر x20 / تقسیم کل نمبر
بی اے / بی ایس سی	حاصل کردہ نمبر x20 / تقسیم کل نمبر
ایم اے / ایم ایس سی	حاصل کردہ نمبر x15 / تقسیم کل نمبر
برآسامی کیلئے کم از کم مطلوبہ پیشہ ورانہ قابلیت	حاصل کردہ نمبر x15 / تقسیم کل نمبر
ایم ایڈ / ایم اے ایجوکیشن	حاصل کردہ نمبر x05 / تقسیم کل نمبر
ایم فل / پی ایچ ڈی	حاصل کردہ نمبر x05 / تقسیم کل نمبر

نوٹ: 1: ہر سکول کی آسامی کیلئے علیحدہ علیحدہ میرٹ لسٹ مرتب کی جائیگی۔ جس میں امیدواروں کے NTS کے حاصل کردہ نمبرات اور تعلیمی قابلیت کے نمبروں کو جمع کیا جائیگا۔ (2) ہر امیدوار سے NTS درخواست فارم 300 روپے چارج کیا جائیگا۔ اگر ایک امیدوار 5 سکولوں کیلئے درخواست دیتا تو اس سے صرف 1200 روپے NTS چارج کریگا۔ جو کہ امیدوار خود برداشت کرینگے۔

عمومی شرائط: (1) تمام امیدواروں کے ڈومیسائل اور شناختی کارڈز میں مستقل سکونت ضلع سوات کا ہونا چاہیے ورنہ درخواست پر غور نہیں کیا جائے گا۔ جبکہ پی ایس ٹی پوسٹوں کے لئے جس سکول میں آسامی خالی ہے امیدوار کا اسی یونین کونسل کا مستقل باشندہ ہونا ضروری ہے۔ اگر اسی یونین کونسل میں امیدوار موجود نہ ہو تو وہ آسامی ملحقہ یونین کونسل کے امیدواروں کو زیر غور لایا جائیگا۔ (2) تمام تقرریاں خالصتاً عارضی بنیادوں پر Adhoc اور کنٹریکٹ پر ایک سال کیلئے ہوگی۔ (3) انٹرویو کے وقت اصلی تعلیمی اسناد بمعہ اصل شناختی کارڈ لانا لازمی ہے۔ اور نیسٹ کے دن صرف اصلی شناختی کارڈ لانا ہوگا۔ (4) میرٹ پر آنے والے امیدواروں کی اسناد متعلقہ ادارے سے تصدیق کرائی جائیں گی جس کے تمام اخراجات امیدواروں کو برداشت کرنا ہونگے۔ (5) انٹرویو کے لئے آنے والے امیدواروں کو کوئی TA/DA نہیں دیا جائے گا۔ (6) صرف مقررہ وقت کے اندر موصول ہونیوالی درخواستوں پر غور کیا جائے گا۔ (7) زیر دستخطی کو اختیار حاصل ہے کہ وہ کوئی وجہ بتائے بغیر کسی بھی، تمام کل یا جزوی طور پر انٹرویو منسوخ کردے۔ (8) اگر اس اختیار کے بعد حکومت وقت کی طرف سے بھرتی کے طریقہ کار میں تبدیلی کی گئی تو سلیکشن کمیٹی اس کے مطابق عمل کرنے کی پابند ہوگی۔ (9) محکمہ ایلیمنٹری و سیکنڈری ایجوکیشن کو اختیار حاصل ہوگا کہ وہ تمام خالی آسامیوں یا اس سے کم پر امیدوار بھرتی کرے (10) تمام تقرریاں حکومت خیبر پختونخوا کے مقرر کردہ قوانین اور مجوزہ طریقہ کار کے مطابق خالصتاً میرٹ کی بنیاد پر ہوگی۔ (11) تمام تعلیمی اسناد صرف گورنمنٹ کے تسلیم شدہ اداروں کی قابل قبول ہوں گی (12) اگر کسی امیدوار کی اسناد جعلی پائے گئے تو اس کے خلاف قانونی چارہ جوئی کی جائیگی اور آئندہ کے لئے اسے سرکاری ملازمت کے لئے نااہل تصور کیا جائے گا۔ (13) نامکمل فارم یا معلومات کی صورت میں درخواست فارم خود بخود منسوخ تصور کیا جائے گا جس کے لئے کوئی اپیل منظور نہیں کی جائے گی۔ (14) انٹرویو کے لئے الگ شیڈول جاری کیا جائے گا۔ (15) تمام تقرریاں متعلقہ اضلاع کے ڈومیسائل کی بنیاد پر ہوگی۔ اگر اس ضلع میں امیدوار دستیاب نہ ہو تو قریبی ضلع کے امیدوار سے میرٹ کی بنیاد پر تقرریاں کی جائیں گی۔ (16) امیدوار کو اسی سکول میں سروس کرنا ہوگی جو کہ ناقابل تبادلہ ہوگی۔ (17) ایک امیدوار بیک وقت (5) سکولوں میں خالی آسامیوں کے لئے درخواست دے سکتا ہے۔ (18) درخواست دینے کا طریقہ کار NTS کی ویب سائٹ پر موجود ہے۔ (19) متعلقہ خالی آسامیوں کی تفصیل سکول وائز درخواست فارم کے ساتھ NTS کے ویب سائٹ پر دی گئی ہیں اور ہر سکول کو اپنا کوڈ دیا گیا ہے۔ (20) معذور امیدوار کیلئے دو فیصد کوٹہ مختص کیا گیا ہے۔ اقلیت کیلئے 0.50 فیصد کوٹہ مقرر کیا گیا ہے۔ (21) دفتر ہذا سے گزشتہ اشتہار کے تحت جن پوسٹوں پر تا حال تقرریاں نہیں ہوئی وہ تمام انٹرویو زاور نیسٹ وغیرہ منسوخ کردیئے گئے ہیں۔

عبداللہ

INF(P) 83 Also available on www.khyberpakhtunkhwa.gov.pk

F.C
25/11/2014

(14)

List of Schools

SWAT

MALE

School Code	District	School Name	UC	CT	DM	PET	AT	TT	Qari	PST	Total Vacancies
321001	SWAT	GHS ASHORAN		1		1	1	1	1		5
321002	SWAT	GHS BAHRAIN		2				1			3
321003	SWAT	GHS BANDAI						1			1
321004	SWAT	GHS BANJOOT						1			1
321005	SWAT	GHS BRAWAL						1			1
321006	SWAT	GHS CHAIL			1		1	1			3
321007	SWAT	GHS DEOLAI						1			1
321008	SWAT	GHS GALOCH						1			1
321009	SWAT	GHS GALOUCH					1				1
321010	SWAT	GHS GAT					1	1			2
321011	SWAT	GHS GOGDARA						1			1
321012	SWAT	GHS GURNAI			1	1	1	1			4
321013	SWAT	GHS JAMBIL						1	1		2
321014	SWAT	GHS KEDAM							1		1
321015	SWAT	GHS KHAZANA						1			1
321016	SWAT	GHS KIDAM			1			1			2
321017	SWAT	GHS KIDAM SWAT					1				1
321018	SWAT	GHS KOTLAI						1			1
321019	SWAT	GHS MANAI					1				1
321020	SWAT	GHS MANYAR						1	1		2
321021	SWAT	GHS MATILTAN						1			1
321022	SWAT	GHS MATTA						1			1
321023	SWAT	GHS PARRAI							1		1
321024	SWAT	GHS PISHMAL						2			2
321025	SWAT	GHS QALAGAY							1		1
321026	SWAT	GHS QANDIL					1				1
321027	SWAT	GHS SHAH DHERAI						2			2
321028	SWAT	GHS SHALHAND					1				1
321029	SWAT	GHS SHALPIN						2			2
321030	SWAT	GHS SHAWAR							1		3
321031	SWAT	GHS SHERPALAM						1	1		2
321032	SWAT	GHS SIJBANR					1				1
321033	SWAT	GHS TOPSIN					1				1
321034	SWAT	GHS UTROOR				1					1
321035	SWAT	GHSS KALAM						1	1		2
321036	SWAT	GHSS KHWAZA KHELA					1				1
321037	SWAT	GHSS KISHAWRA					1				1
321038	SWAT	GHSS KISHWARA						1			1
321039	SWAT	GHSS MANKEYAL					2	1			3
321040	SWAT	GHSS MANKYAL				1					1
321041	SWAT	GHSS SHAMOZI					1	1			2
321042	SWAT	GMPS JAWARO BIAKAND	Arkot							1	1
321043	SWAT	GMS ALIGRAMA					1				1
321044	SWAT	GMS ANAKAR		1	1			1			3
321045	SWAT	GMS ANAKER					1				1
321046	SWAT	GMS AREEN		2							2
321047	SWAT	GMS ASHAR BANR					1				1
321048	SWAT	GMS AYEEN		2				1			3
321049	SWAT	GMS AZAD BANDA					1				1
321050	SWAT	GMS AZADA BANDA			1						1
321051	SWAT	GMS BAFAR					1				1
321052	SWAT	GMS BAR BARGIN				1					1
321053	SWAT	GMS BARGIN					1				1
321054	SWAT	GMS BAYUN		1	1						2
321055	SWAT	GMS BEHAR		1			1				2
321056	SWAT	GMS BESHIGRAM						1			1
321057	SWAT	GMS CHAM GARAI						1			1
321058	SWAT	GMS CHAMGARAI					1				1
321059	SWAT	GMS CHARMA			1		1				2
321060	SWAT	GMS CHINKOLAI					1				1
321061	SWAT	GMS DABERGAI			1						1
321062	SWAT	GMS DAD					1				1
321063	SWAT	GMS DAKORAK					1				1
321064	SWAT	GMS DAMANA					1	1			2
321065	SWAT	GMS FAZAL BANDA			1						1
321066	SWAT	GMS GABRAL					1	1			2
321067	SWAT	GMS GANAJIR						1			1

T.C

5/11/2014

321068	SWAT	GMS GHAKHI BANDA						1			1
321069	SWAT	GMS GODA						1			1
321070	SWAT	GMS KALALGAY				1					1
321071	SWAT	GMS KOTA					1				1
321072	SWAT	GMS LAKHAR					1				1
321073	SWAT	GMS LALKOO			1						1
321074	SWAT	GMS TIRAT					1				1
321075	SWAT	GPS ALLAABAD	Gulibagh							1	1
321076	SWAT	GPS AMLOOK DARA	Ghalegay							1	1
321077	SWAT	GPS AWAR PATAY	Kalakalay							1	1
321078	SWAT	GPS AWESHAH	chuprial							1	1
321079	SWAT	GPS BAHDAR BANDA	Koza Bandai							1	1
321080	SWAT	GPS BALALAI	Gulibagh							1	1
321081	SWAT	GPS BARA DURESHKHELA	Dureshkhela							1	1
321082	SWAT	GPS BEHRAIN	Behrain							1	1
321083	SWAT	GPS BELA BATAKA	Shah Dehrai							2	2
321084	SWAT	GPS BODAY GHAR	AKMB							2	2
321085	SWAT	GPS BODIGRAM	Baidara							1	1
321086	SWAT	GPS CHARBAGH	Charbagh							1	1
321087	SWAT	GPS CHARMA	Gwaleari							1	1
321088	SWAT	GPS CHATIKAL	Beha							1	1
321089	SWAT	GPS CHINDA KHWARA	Bar Aba Khel							1	1
321090	SWAT	GPS DARA DABARGAY	Bashigram							2	2
321091	SWAT	GPS DARA PARAI	Barikot							1	1
321092	SWAT	GPS DARDYAL	Tall							1	1
321093	SWAT	GPS DEDAWAR	Shamozai							1	1
321094	SWAT	GPS DITPANAI	Matta/Kharerai							1	1
321095	SWAT	GPS FAZAL ABAD DEOLAI	Deolai							1	1
321096	SWAT	GPS GANORAI	Kokarai							1	1
321097	SWAT	GPS GARDAM	Beha							1	1
321098	SWAT	GPS GOLDEN	Deolai							1	1
321099	SWAT	GPS JALOO	AKMB							1	1
321100	SWAT	GPS JANIMAR	Tirat							2	2
321101	SWAT	GPS KABAL KOO	Gwaleari							2	2
321102	SWAT	GPS KALAM OLD	Kalam							2	2
321103	SWAT	GPS KANATAI	Gwaleari							1	1
321104	SWAT	GPS KANJU NO.2	Kanju							1	1
321105	SWAT	GPS KIDAM	Balakot							1	1
321106	SWAT	GPS KOZ BARGIN	Shin							2	2
321107	SWAT	GPS MAHAK	Kalakalay							1	1
321108	SWAT	GPS MANDAN	AKMB							2	2
321109	SWAT	GPS MANGLOR NO.2	AKMB							1	1
321110	SWAT	GPS MIANDAM	Miandam							1	1
321111	SWAT	GPS NAZAR ABAD	Arkot							1	1
321112	SWAT	GPS PINDA SHAH PATAY	Koz Aba Khel							2	2
321113	SWAT	GPS QANDIL	Qandail							1	1
321114	SWAT	GPS RADOKRAI	Barthna							1	1
321115	SWAT	GPS SAMBAT	Baidara							1	1
321116	SWAT	GPS SAMBAT CHAM	Baidara							1	1
321117	SWAT	GPS SHAHEED BABA NO.2	Kanju							1	1
321118	SWAT	GPS SHAKAR DARA	Pir Kalay							1	1
321119	SWAT	GPS SHALKYAR	Bashigram							1	1
321120	SWAT	GPS SHER PALAM NO.2	Pir Kalay							1	1
321121	SWAT	GPS SHORSHAHI	Shawar							2	2
321122	SWAT	GPS SUBANR	Arkot							1	1
321123	SWAT	GPS SIRSENAI NO.2	Bar Aba Khel							1	1
321124	SWAT	GPS TALIGRAM	Taligram R/S-18							1	1
321125	SWAT	GPS TALINGA	Tirat							2	2
321126	SWAT	GPS TANGBANR	Pir Kalay							1	1
321127	SWAT	GPS TANGO	Shalpin R/S-22							1	1
321128	SWAT	GPS ZIARAT SWEGALAI	Koz Aba Khel							1	1
321129	SWAT	GPS ZWALA	Jano/Chamtalai							1	1
321130	SWAT	GPS.JAGAH	Behrain							1	1
321131	SWAT	GPS.TOTANO BANDAI	Totano Bandai							1	1

T.C,
5/11/2014

(AT) (16) Annexure "D"

FFICE OF THE DISTRICT EDUCATION OFFICER
(M) SWAT AT GULKADA
Cell # 0946 9240209-228

OFFICE ORDER

Consequent upon the post of AT of the following schools advertised through NTS, the District Education officer Swat is pleased to transfer/ adjust the Arabic Teachers of these schools on their own pay and scale at the school noted against each against vacant AT post in the interest of public service with immediate effect.

S.#	Name of Teacher	From	To	Remarks
1	Mr. Muhammad Tayyab AT	GHS: Sijbanr	GMS: Sar Banda	Against vacant AT post.
2	Mr. Muhammad Ishaq SAT	GHS: Gaaloch	GHS: Dardeyal	Against vacant AT post.
3	Mr. Ghulam Hussain AT	GMS: Aligrama	GMS: Mahak	Against vacant AT post.
4	Mr. Abdullah AT	GMS: Dakorak	GMS: ~~Sar Banda~~ Manpitar	Against vacant AT post.
5	Mr. Watan Karam AT	GMS: Damana	GMS: Toor Wall	Against vacant AT post.
6	Mr. Nadar Khan ~~AT~~ SAT	GHS: Ashoran	GHSS: Mankeyal	Against vacant AT post.
7	Mr. Minhaj Ahmad AT	GMS: Asharbanr	GHS: Chancharay	Against vacant AT post.

NOTE: Compliance reports should be submitted to all concerned.

(MUHAMMAD UZAIR ALI)
DISTRICT EDUCATION OFFICER
(MLAE) SWAT AT GULKADA

Endst No. 65-68 /NTS/Apptt: 2014 dated 2/11/14

Copy of the above is forwarded to: -

1. The Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
2. The District Comptroller of Accounts Swat.
3. The Budget & Accounts officer local office.
4. The Principal GHSS/GHS and GMS: concerned.

I.C. 3/11/2014

DISTRICT EDUCATION OFFICER
(MLAE) SWAT AT GULKADA

(16 A)

OFFICE OF THE
DISTRICT EDUCATION OFFICER (MALE)
Swat (Cell # 0946 9240209-228)

APPOITMENT

Consequent upon recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the vacant AT posts on one year Ad hoc School based policy in BPS: 15 (Rs.8500-700-29500) Fixed plus usual allowances as admissible under the Rules and existing policy of the Provincial Government, in Teaching Cadre on the terms & conditions given below with effect from the date of their taking over charge.

S. #	Name of candidate	Father's Name	D/O Birth	Score	Remarks
1	Mr. Zaiul Haq	Rashid Khan	10.02.1987	125.26	GHS: Shawar
2	Mr. Mahboob Ur Rahman	Azizur Rahman	01.03.1985	124.12	GHSS: Kishawra
3	Mr. Muhammad Atta ul Haq	Muhammad Khaleeq	05.03.1986	123.81	GHS: Sijbanr
4	Mr. Miftahud Din	Fazal Naeem	14.04.1982	123.26	GHSS: Shamozi
5	Mr. Kifayat Ullah	Aziz ur Rahman	01.03.1980	122.78	GMS: Bihar
6	Mr. Shahid Iqbal	Hamid Iqbal	17.07.1987	121.17	GMS: Kotir
7	Mr. Saleem Ullah	Faqir Muhammad	20.04.1987	121.03	GMS: Gabral
8	Mr. Bakht Muhammad	Fazal Ghafoor	06.02.1981	120.44	GMS: Dad
9	Mr. Saeed ur Rahman PST GPS: No.01 Qambar	Abdur Rahman	01.03.1978	119.43	GMS: Gaboch
10	Mr. Atta ur Rahman PST GPS: Jur Bandai	Muhammad Amin	01.02.1974	117.77	GMS: Charma
11	Mr. Saleem Ullah Khan PST	Aslam Khan	15.04.1982	117.54	GHS: Gat
12	Mr. Abdul Hai	Saidun Nas	14.12.1984	117.31	GHS: Manai
13	Mr. Said Jehan Shah PST GPS: Babo	Muhammad Kamal	01.04.1977	117.18	GMS: Chinkolai
14	Mr. Sohrab	Muhammad Azim	15.04.1983	116.9	GHS: Shalhand
15	Mr. Rafiq Ahmad	Saeed Ahmad	10.04.1982	116.27	GMS: Lakhar
16	Mr. Atta Ullah	Sher Zada	28.02.1984	116.09	GMS: Asharbanr
17	Inam Ullah PST GPS: Bakur	Sher Zaman Khan	12.04.1982	116.08	GMS: Dakorak
18	Mr. Zia Ullah	Muhammad Ishaq	10.02.1987	115.41	GHS: Topsin
19	Mr. Noor ul Hadi	Abdul Ahad	12.04.1982	115.17	GHS: Chail
20	Mr. Umar Hadi	Abdur Raziq	02.03.1985	114.83	GHS: Gurnai
21	Mr. Izaz Karam	Muhammad Karam	01.04.1980	114.74	GMS: Damana
22	Mr. Muhammad Seddique	Muhammad Shafique	02.07.1982	114.63	GHS Qandil
23	Mr. Niaz Badshah	Bakht Bad Shah	10.04.1983	114.42	GHS: Kidam
24	Mr. Shahid Hussain	Wali Ahad	02.03.1987	114.42	GMS: Bar Bargin
25	Atta Ullah	MUHAMMAD AZIZ	01.04.1977	114.36	GHS: Ashoran
26	Ikram Ullah	Bahramand	01.01.1992	114.03	GMS: Tirat

T.C
12/12/14

27	Abdul Ghafar	Farooq Shah	01.04.1987	113.9	GMS: Aligrama
28	Mr. Akbar Ali	Anwar Ali Shah	12.05.1989	111.87	GMS: [illegible]
29	Mr. Neamat Ullah	Hazrat Shah	10.04.1978	107.09	GMS: [illegible]

Terms & Conditions

1. No TA/DA is allowed.
2. Charge reports should be submitted to all concerned.
3. Appointment is purely on temporary & ad hoc basis for one year with effect from 01.10.201[illegible] 30.09.2015.
4. He should not be handed over charge if he exceeds 38 (Thirty Eight) years or below 18 [illegible]
5. Appointment is subject to the condition that the certificates/documents must be verified [illegible] concerned authorities, anyone found producing bogus certificate will be reported to [illegible] enforcing agencies for further action.
6. His services are liable to termination on one month's prior notice from either side. In [illegible] resignation without notice his one month pay /allowances shall be forfeited to the Government.
7. Pay shall not be drawn until and unless a certificate issued by this office that his documents [illegible] verified.
8. He should join his post within 30 days of the issuance of this notification. In case of failure to join the post within 30 days of the issuance of this Notification his appointment shall stand cancelled automatically and no subsequent appeal etc shall be entertained.
9. Health & Age Certificate should be produced from the Medical Superintendent before taking over charge.
10. He will be governed by such Rules and Regulation as may be issued from time to time by the Government.
11. His services shall be terminated at any time in case his performance is found unsatisfactory during the service period. In case of misconduct, he shall be proceeded under the relevant rules & regulations announced from time to time.
12. His appointment is Ad hoc and school based. He shall have to serve at the place of posting and his service is not transferable to any other station.
13. Before handing over charge his documents may be checked and if found bogus or irrelevant to the qualification and rules charge of the post may not handed over.

T.C
12/12/14

(Prof. MUHAMMAD UZAIR ALI)
DISTRICT EDUCATION OFFICER
SWAT GULKADA

Endst No: 1454-1518/AT/Appointment/Ad hoc/NTS dated:30 /09/2014

Copy of the above is forwarded for information & necessary action to: -

1. The Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. The District Comptroller of Accounts Swat.
3. The Principal/ Headmaster concerned.
4. The Deputy DEO Male local office.
5. The B&AO local office
6. The Supdt Secondary local office.
7. The candidate concerned.
8. PA to D E O local office.

DISTRICT EDUCATION OFFICER
(MALE) SWAT GULKADA

(17)

Annexure "E"

بخدمت جناب ڈسٹرکٹ ایجوکیشن آفیسر (مردانہ) سیدو شریف سوات

No: 2580

15-9-2014

جناب عالی!

عنوان: اپیل بابت تنسیخ ٹرانسفر آرڈر 68-65 مورخہ 02/09/014

محترم DEO(M) صاحب،

میں عرض گزار ہوں کہ میں بحیثیت AT معلم گورنمنٹ مڈل سکول علیگرامہ میں یکم جون 2013 سے اپنا فرائض منصبی انجام دے رہا ہوں۔ اور مجھے سکول ھذا سے بغیر کسی وجہ/شکایت گورنمنٹ مڈل سکول ملک کو تبدیل کیا ہے۔ جو کہ سراسر نا انصافی اور غیر قانونی ہے۔ اور آفس آرڈر میں AT پوسٹ کو خالی ظاہر کیا ہے۔

اور سکول ھذا میں 15 مہینوں سے اپنی فرائض منصبی انجام دے رہا ہوں۔ اور مجھے کوئی وجہ بغیر GMS سکیم میں Adjust کیا ہے۔ جو کہ خلاف قانون اور Transfer Rules کے کھلم کھلا خلاف ورزی ہے۔

T.C. 5/11/2014

لہٰذا آپ صاحبان میربانی فرما کر میرے ٹرانسفر آرڈر کو منسوخ کرکے مجھے GMS علیگرامہ میں تعینات کرنے دیں۔ تو عین نوازش ہوگی۔

(آرڈر کاپی لف ہے)

فقط

غلام حسین AT

GMS علیگرامہ سوات

مورخہ 13-09-014

Farwarded in orginal to the DEO(M) for further (N/A) pleas.

Head Master,
Govt: Middle School,
Aligrama, Distt: Swat.

بعدالت جناب سروس ٹریبیونل خیبر پختونخواہ پشاور کیمپ کورٹ گل کدہ ضلع سوات

کورٹ فیس	قیمت ایک روپیہ

مورخہ ۱ نومبر ۲۰۱۶ منجانب ایڈیشنل

مقدمہ غلام حسین بنام محکمہ تعلیم بذالیہ سیکرٹری خیبر پختونخواہ وغیرہ

دعویٰ سروس اپیل

جرم

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ آن مقام پشاور گل کدہ ضلع سوات کیلئے شاکر اللہ ایڈووکیٹ، طارق عزیز ایڈووکیٹ (اور عمر زادہ) مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیاط ہوگا۔ نیز وکیل صاحب کو راضی نامہ وتقرر ثالث وفیصلہ پر حلف دینے جواب دی اور اقبال دعویٰ اور درخواست ہر قسم کی تصدیق زر اور اس پر دستخط کرنے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری ایک طرف یا اپیل کی برامد ہوگی اور منسوخ مذکور کے نسل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنی ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقررہ شدہ کو بھی جملہ مذکورہ بالا اختیارات حاصل ہونگے اور اسکا ساختہ برداختہ منظور وقبول ہوگا۔ اور دوران مقدمہ میں جو خرچہ وہرجانہ التوائے مقدمہ کے سبب سے ہوگا اسکے مستحق وکیل صاحب ہونگے۔ نیز بقایا وخرچہ کی وصولی کرنے کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہونگے کی پیروی مقدمہ مذکور لہذا وکالت نامہ لکھ دیا کہ سند رہے۔

المرقوم ۱ ماہ نومبر ۲۰۱۶

العبد گواہ شدہ العبد Advocate

بمقام پشاور گل کدہ ضلع سوات کے لئے منظورہ ہے

Attested and Accepted by Shakirullah Advocate 01-11-2016

(18) Annexure "F"

This is an appeal filed by Mr. Ghulam Hussain today on 05/11/2014 against the order dated 02.09.2014 against which he preferred/made a departmental appeal on 13.09.2014 the period of ninety days is not yet lapsed as per section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, which is premature as laid down in an authority reported as 2005-SCMR-890.

As such the instant appeal is returned in original to the appellant/counsel. The appellant would be at liberty to resubmit fresh appeal after maturity of cause of action and also removing the following deficiencies.

1- Memorandum of appeal may be got signed by the appellant.
2- Address of respondent No.4 is incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
3- Affidavit may be got attested by the Oath Commissioner.
4- Page No.11 of the appeal is illegible which may be replaced by legible/better one.
5- Six more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1575 /ST,

Dt. 5 - 11 /2014

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Tariq Aziz Adv. Swat.

PTO

Sir,

Objection removal

Re-submitted

BEFORE THE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO 1402/14

Ghulam Hussain AT (BPS-15) GMS Aligrama District SWAT.

Appellant

VERSUS

Secretary Elementary & Secondary Education KP & others

Respondents

JIONT PARA WISE COMMENTS ON BEHALF OF RESPONDENTS NO 1 TO 3

RESPECT FULLY SHEWETH

PRELIMINARY OBJECTIONS

1- The appellant has no locus standi /no cause of actions to file the instant appeal against the respondents.
2- The appellant is estoped by his own conduct to file the instant appeal.
3- The instant appeal is not maintainable in the present form.
4- That the instant appeal is time-barred.

20
(2)

FACTUAL OBJECTIONS

1- That Para No 1 is related to the service record of the Appellant, Hence needs no comments.

2- That Para No 2 is related to the transfers of the Appellant, Hence needs no comments.

3- That the respondents advertised some posts of AT in Daily Mashriq Dated 8/1/2014 on One year Adhoc School based Appointments Policy. The Post AT of GMS Aligrama has been allocated to the NTS for One Year Adhoc School based Appointments policy under school code No 321043.

Copy of Advertisement & list of schools is attached as annexure A & B.

4- That the Appellant was transferred from GMS Aligrama to GMS Mahak vide Endst No 6568/NTS/APPTT:2014 Dated 2/9/2014 Due to Allocation of this post to NTS for One Year Adhoc School based Appointments policy as Already clarified in Para No 3. Office Order is attached as Annexure C.

5- That the Departmental Appeal of the Appellant was not considered by the respondent No 3 Due to the Allocation of the post of AT of GMS Aligrama to the NTS for one year Adhoc School based Appointments policy as already clarified in Para No 3 & 4.

6- That Service Appeal of the Appellant was returned by the Honorable Service Tribunal because it was Premature & Incomplete. Copy Is Attached As Annexure D.

7- That the Transfer/Appointment of Respondents Orders Dated 02/09/2014 & 30/09/2014 are legal, Constitutional & According to the rules & policy of GOVT of KP.

GROUNDS

1- That the Transfer/Appointment Orders Dated 02/09/2014 & 30/09/2014 by Respondents are legal, Constitutional & Based on rules & policy of GOVT of KP.

2- That the post of AT of GMS Aligrama was allocated to NTS for One Year Ad Hoc School based Appointments as per GOVT: Policy. The Appellant has not been penalized because transfer is not a penalty.

3- That the respondent has not violated rules & Policies as already clarified in Para No 3 of factual objections.

4- That the post of AT of GMS Aligrama has been allocated to the NTS for One Year Ad Hoc School based Appointments, Which has been shown on NTS website under School Code 321043.

5- That is Para is related to the matter of transportation, Hence needs no comments.

6- That the Appointment orders Dated 30/09/2014 is not favorable to Respondent No 4 at the cost of the Petitioner.
That the Respondent No 4, Mr. Abdul Ghafoor S/O Farooq Shah has been appointed on mint through NTS after due process at S/NO 27. Copy of Appointment order is attached as Annexure E.

7- That this Para is related to service of the Appellant, Hence needs no comments.
That the Appellant cannot be adjusted at GMS Aligrama because Mr. Abdul Ghafar has been appointed under One Year Ad Hoc School based Appointment Policy through NTS.

That the respondents also seek permission to raise additional grounds and proofs at the time of arguments before the honorable service tribunal.

In view of the above facts and circumstances, this Honorable Tribunal may very graciously be pleased to dismiss the present appeal with cost in favor of Respondents.

DISTRICT EDUCATION OFFICER
(MALE) DISTRICT SWAT

DIRECTOR
(E&SE) KHYBER PAKHTUNKHWA
AT PESHAWAR

SECRETARY
(E&SE) KHYBER PAKHTUNKHWA
AT PESHAWAR

(5) 29

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL No. 1402/14

GHULAM HUSSAIN AT GMS ALIGRAMA SWAT

.....APPELLANT

VERSUS

THE SECRETARY ELEMENTRY AND SECONDARY EDUCATION PESHAWAR AND OTHERS.

.....RESPONDENTS

AFFIDAVIT

I Muhammad Uzair Ali DEO (M) Swat do here by solemnly affirm and declare that the contents of the comments are true and correct to the best of my knowledge and belief and nothing has been kept secret from this august court .

(Prof: Muhammad Uzair Ali)

District Education Officer (M)

District Swat

(4)

فهرس الموضوعات

فاتحة

خاتمة سبع

(13)

Annexure "A"
Page 13-15

Annex-A

Annex A (6)

INF(P) 97 Also available on www.khyberpakhtunkhwa.gov.pk

درخواست برائے مطلوبہ آسامیاں

محکمہ ایلیمنٹری اینڈ سیکنڈری ایجوکیشن ضلع سوات کے زیر انتظام مردانہ سکولوں میں مندرجہ ذیل کیڈر کی خالی آسامیوں پر ایڈہاک سکول بیسڈ (Adhoc School Based) تقرریاں کے لئے ضلع سوات کے سکونتی اہل امیدواروں سے بکوڑہ فارم پر مورخہ 20 جنوری 2014ء تک درخواستیں مطلوب ہیں۔

درخواست فارم این ٹی ایس NTS کی ویب سائٹ (http://www.nts.org.pk) پر دستیاب ہے۔ یاد رہے کہ نامکمل اور مقررہ تاریخ گزرنے کے بعد موصول ہونے والی درخواستوں پر غور نہیں کیا جائیگا

نمبر شمار	نام آسامی	تعلیمی قابلیت	عمر فی حد
1	سی ٹی BPS-15	بی اے/بی ایس سی یا مساوی قابلیت کسی بھی تسلیم شدہ یونیورسٹی سے بمعہ بی ایڈ سرٹیفکیٹ یا 2 سالہ ایسوسی ایٹ ڈگری ان ایجوکیشن کسی بھی تسلیم شدہ یونیورسٹی سے یا 18 (اٹھارہ) ماہ کا ڈپلومہ ان ایجوکیشن	18 تا 35 سال
2	ڈی ایم BPS-15	بی اے/بی ایس سی کسی بھی تسلیم شدہ یونیورسٹی سے بمعہ ایک سالہ ڈرائنگ ماسٹر کورس کا سرٹیفکیٹ	18 تا 35 سال
3	پی ای ٹی BPS-15	بی اے/بی ایس سی یا مساوی قابلیت کسی بھی تسلیم شدہ یونیورسٹی سے بمعہ ایک سالہ ڈپلومہ ان فزیکل ایجوکیشن کورس یا اس سے مساوی سرٹیفکیٹ یا ڈپلومہ مساوی قابلیت	18 تا 35 سال
4	اے ٹی BPS-15	ایس ایس سی (سیکنڈ ڈویژن) کسی بھی تسلیم شدہ بورڈ سے بمعہ شہادۃ العالیہ فی العلوم العربیہ والاسلامیہ کسی مستند ادارہ مثلاً جامعہ الوفاق المدارس یا دارالعلوم سید شریف سوات، دارالعلوم چارباغ سوات، دارالعلوم چترال، دارالعلوم دروش چترال یا کسی بھی تسلیم شدہ یونیورسٹی سے عربی میں بیچلر ڈگری یا سیکنڈ کلاس ماسٹرز ڈگری	18 تا 35 سال 20
5	ٹی ٹی BPS-15	ایس ایس سی (سیکنڈ ڈویژن) کسی بھی تسلیم شدہ بورڈ سے بمعہ شہادۃ العالیہ کسی منظور شدہ تسلیم الوفاق المدارس یا دارالعلوم سید شریف سوات، دارالعلوم چارباغ سوات، دارالعلوم چترال، دارالعلوم دروش چترال اور کوئی دیگر دارالعلوم جو گورنمنٹ کے زیر انتظام ہو اور اس کا ایجوکیشن حکومت نے وقتاً فوقتاً جاری کیا ہو یا سیکنڈ ڈویژن ایم اے اسلامیات کسی بھی تسلیم شدہ یونیورسٹی سے۔	18 تا 35 سال 20
6	قاری BPS-12	انٹرمیڈیٹ بمعہ حفظ القرآن اور سند قرأت کسی بھی منظور شدہ ادارے سے	18 تا 35 سال
7	پی ایس ٹی BPS-12	انٹرمیڈیٹ یا مساوی سرٹیفکیٹ کسی بھی تسلیم شدہ بورڈ سے بمعہ پرائمری سکول ٹیچر سرٹیفکیٹ/ڈپلومہ ان ایجوکیشن، کسی مستند ادارے سے یا ایس ایس سی (سیکنڈ ڈویژن) کسی بھی منظور شدہ بورڈ سے بمعہ 2 سالہ ایسوسی ایٹ ڈگری ان ایجوکیشن کسی بھی تسلیم شدہ یونیورسٹی سے	18 تا 35 سال

سلیکشن کریٹیریا: (Selection Criteria)

اسامیوں کے لئے سلیکشن کو بنیاد درج ذیل تین نکات 200 نمبرات کی تقسیم اس طرح سے کی جائیگی۔

ا۔ تحریری ٹیسٹ بذریعہ NTS= 100 نمبر ب۔ تعلیمی قابلیت=100 نمبر جس کی مزید تقسیم اس طرح ہوگی

تعلیمی قابلیت	کل نمبر
ایس ایس سی	حاصل کردہ نمبر x20 تقسیم کل نمبر
ایف اے/ایف ایس سی	حاصل کردہ نمبر x20 تقسیم کل نمبر
بی اے/بی ایس سی	حاصل کردہ نمبر x20 تقسیم کل نمبر
ایم اے/ایم ایس سی	حاصل کردہ نمبر x15 تقسیم کل نمبر
ہر آسامی کیلئے لازم مطلوبہ پیشہ ورانہ قابلیت	حاصل کردہ نمبر x15 تقسیم کل نمبر
ایم ایڈ/ایم اے ایجوکیشن	حاصل کردہ نمبر x05 تقسیم کل نمبر
ایم فل/پی ایچ ڈی	حاصل کردہ نمبر x05 تقسیم کل نمبر

نوٹ: 1: بیرسٹول کی آسامی کیلئے علیحدہ میرٹ لسٹ مرتب کی جائیگی۔ جس میں امیدواروں کے NTS کے حاصل کردہ نمبرات اور تعلیمی قابلیت کے نمبروں کو جمع کیا جائیگا۔ (2) ہر امیدوار سے NTS کی درخواست فارم 300 روپے چارج کیا جائیگا۔ اگر ایک امیدوار 5 سکولوں کیلئے درخواست دیتا تو اس سے صرف 1200 روپے NTS چارج کریگا۔ جو کہ امیدوار خود برداشت کرے گا۔

عمومی شرائط: (1) تمام امیدواروں کے ڈومیسائل اور شناختی کارڈ میں مستقل سکونت ضلع سوات کا ہونا چاہیے۔ ورنہ درخواست پر غور نہیں کیا جائے گا۔ جبکہ پی ایس ٹی پوسٹوں کے لئے جس سکول میں آسامی خالی ہے امیدوار کا اسی یونین کونسل کا مستقل باشندہ ہونا ضروری ہے۔ اگر اسی یونین کونسل میں امیدوار موجود نہ ہو تو دوآسامی ملحقہ یونین کونسل کے امیدواروں کو زیر غور لایا جائیگا۔ (2) تمام تقرریاں خالصتاً عارضی بنیادوں پر Adhoc اور کنٹریکٹ پر ایک سال کیلئے ہونگی۔ (3) انٹرویو کے وقت اصل تعلیمی اسناد بمعہ اصل شناختی کارڈ لانا لازمی ہے۔ اور میٹ کے دن صرف اصل شناختی کارڈ لانا ہوگا۔ (4) میرٹ پر آنے والے امیدواروں کی اسناد متعلقہ ادارے سے تصدیق کرائی جائیں گی جس کے تمام اخراجات امیدواروں کو برداشت کرنا ہونگے۔ (5) انٹرویو کے لئے آنے والے امیدواروں کو کوئی TA/DA نہیں دیا جائے گا۔ (6) صرف مقررہ وقت کے اندر موصول ہونے والی درخواستوں پر غور کیا جائے گا۔ (7) زیر تکمیل کو اختیار حاصل ہے کہ وہ کوئی وجہ بتائے بغیر کسی بھی وقت کلی یا جزوی طور پر اشتہار منسوخ کردے۔ (8) اگر اس اشتہار کے بعد حکومت وقت کی طرف سے بھرتی کے طریقہ کار میں تبدیلی کی گئی تو سلیکشن کمیٹی اس کے مطابق عمل کرنے کی پابند ہوگی۔ (9) محکمہ ایلیمنٹری اینڈ سیکنڈری ایجوکیشن کو اختیار حاصل ہوگا کہ وہ تمام خالی آسامیوں یا اس سے کم پر امیدوار بھرتی کرے (10) تمام تقرریاں حکومت خیبر پختونخوا کے مقرر کردہ قوانین اور بھرتی طریقہ کار کے مطابق خالصتاً میرٹ کی بنیاد پر ہونگی۔ (11) تمام تعلیمی اسناد صرف گورنمنٹ کے تسلیم شدہ اداروں کی قابل قبول ہوں گی (12) اگر کسی امیدوار کی اسناد جعلی پائے گئے تو اس کے خلاف قانونی چارہ جوئی کی جائیگی اور آئندہ کے لئے اسے سرکاری ملازمت کے لئے نااہل تصور کیا جائے گا۔ (13) نامکمل فارم یا معلومات کی صورت میں درخواست فارم خود بخود مسترد تصور کیا جائے گا جس کے لئے کوئی اپیل منظور نہیں کی جائے گی۔ (14) انٹرویو کے لئے الگ شیڈول جاری کیا جائے گا۔ (15) تمام تقرریاں متعلقہ اضلاع کے ڈومیسائل کی بنیاد پر ہونگی۔ اگر اس ضلع میں امیدوار دستیاب نہ ہو تو قریبی ضلع کے امیدوار سے میرٹ کی بنیاد پر تقرریاں کی جائیں گی۔ (16) امیدوار کو اسی سکول میں سروس کرنا ہوگی جو کہ تا قابل تبادلہ ہوگی۔ (17) ایک امیدوار بیک وقت (5) سکولوں میں خالی آسامیوں کے لئے درخواست دے سکتا ہے۔ (18) درخواست دینے کا طریقہ کار NTS کی ویب سائٹ پر موجود ہے۔ (19) متعلقہ خالی آسامیوں کی تفصیل سکول وائز درخواست فارم کے ساتھ NTS کے ویب سائٹ پر دی گئی ہیں اور ہر سکول کو اپنا کوڈ دیا گیا ہے۔ (20) معذور امیدوار کیلئے دو فیصد کوٹہ مقرر کیا گیا ہے۔ اقلیت کیلئے 0.50 فیصد کوٹہ مقرر کیا گیا ہے۔ (21) دفتر ہذا سے گزشتہ اشتہار کے تحت جن پوسٹوں پر تا حال تقرریاں نہیں ہوئی وہ تمام اشتہارات دیئے گئے ہیں۔

عبداللہ

INF(P) 83 Also available on www.khyberpakhtunkhwa.gov.pk

T.C. 5/11/2019

روزنامہ مشرق 8/1/2014

Annex-A

(44)

Annex-B

List of Schools

SWAT

MALE

(7)

School Code	District	School Name	UC	CT	DM	PET	AT	TT	Qari	PST	Total Vacancies
321001	SWAT	GHS ASHORAN		1		1	1	1	1		5
321002	SWAT	GHS BAHRAIN		2				1			3
321003	SWAT	GHS BANDAI						1			1
321004	SWAT	GHS BANJOOT						1			1
321005	SWAT	GHS BRAWAL						1			1
321006	SWAT	GHS CHAIL			1		1	1			3
321007	SWAT	GHS DEOLAI						1			1
321008	SWAT	GHS GALOCH						1			1
321009	SWAT	GHS GALOUCH					1				1
321010	SWAT	GHS GAT					1	1			2
321011	SWAT	GHS GOGDARA						1			1
321012	SWAT	GHS GURNAI			1	1	1	1			4
321013	SWAT	GHS JAMBIL						1	1		2
321014	SWAT	GHS KEDAM							1		1
321015	SWAT	GHS KHAZANA						1			1
321016	SWAT	GHS KIDAM			1			1			2
321017	SWAT	GHS KIDAM SWAT							1		1
321018	SWAT	GHS KOTLAI							1		1
321019	SWAT	GHS MANAI					1				1
321020	SWAT	GHS MANYAR					1	1			2
321021	SWAT	GHS MATILTAN						1			1
321022	SWAT	GHS MATTA						1			1
321023	SWAT	GHS PARRAI					1				1
321024	SWAT	GHS PISHMAL					2				2
321025	SWAT	GHS QALAGAY						1			1
321026	SWAT	GHS QANDIL				1					1
321027	SWAT	GHS SHAH DHERAI					2				2
321028	SWAT	GHS SHALHAND				1					1
321029	SWAT	GHS SHALPIN					2				2
321030	SWAT	GHS SHAWAR						1			3
321031	SWAT	GHS SHERPALAM					1	1			2
321032	SWAT	GHS SUBANR				1					1
321033	SWAT	GHS TOPSIN				1					1
321034	SWAT	GHS UTROOR			1						1
321035	SWAT	GHSS KALAM					1	1			2
321036	SWAT	GHSS KHWAZA KHELA					1				1
321037	SWAT	GHSS KISHAWRA					1				1
321038	SWAT	GHSS KISHWARA				1					1
321039	SWAT	GHSS MANKEYAL					2	1			3
321040	SWAT	GHSS MANKYAL			1						1
321041	SWAT	GHSS SHAMOZI				1	1				2
321042	SWAT	GMPS JAWARO BIAKAND	Arkot							1	1
321043	SWAT	GMS ALIGRAMA				1					1
321044	SWAT	GMS ANAKAR		1	1		1				3
321045	SWAT	GMS ANAKER		2		1					3
321046	SWAT	GMS AREEN				1					1
321047	SWAT	GMS ASHAR BANR		2							2
321048	SWAT	GMS AYEEN				1					1
321049	SWAT	GMS AZAD BANDA		2			1				3
321050	SWAT	GMS AZADA BANDA					1				1
321051	SWAT	GMS BAFAR			1						1
321052	SWAT	GMS BAR BARGIN					1				1
321053	SWAT	GMS BARGIN				1					1
321054	SWAT	GMS BAYUN					1				1
321055	SWAT	GMS BEHAR		1	1						2
321056	SWAT	GMS BESHIGRAM		1		1					2
321057	SWAT	GMS CHAM GARAI					1				1
321058	SWAT	GMS CHAMGARAI					1				1
321059	SWAT	GMS CHARMA				1					1
321060	SWAT	GMS CHINKOLAI			1	1					2
321061	SWAT	GMS DABERGAI				1					1
321062	SWAT	GMS DAD			1						1
321063	SWAT	GMS DAKOPAK				1					1
321064	SWAT	GMS DAMANA				1					1
321065	SWAT	GMS FAZAL BANDA				1	1				2
321066	SWAT	GMS GABRAL			1						1
321067	SWAT	GMS GANAJIR				1	1				2
						1					1

T.C

5/11/2014

Annex-B

(15)

(8)

321068	SWAT	GMS GHAKHI BANDA						1				1
321069	SWAT	GMS GODA						1				1
321070	SWAT	GMS KALALGAY				1						1
321071	SWAT	GMS KOTA					1					1
321072	SWAT	GMS LAKHAR					1					1
321073	SWAT	GMS LALKOO			1							1
321074	SWAT	GMS TIRAT					1					1
321075	SWAT	GPS ALLAABAD	Gulibagh								1	1
321076	SWAT	GPS AMLOOK DARA	Ghalegay								1	1
321077	SWAT	GPS AWAR PATAY	Kalakalay								1	1
321078	SWAT	GPS AWESHAH	chuprial								1	1
321079	SWAT	GPS BANDAR BANDA	Koza Bandai		1						1	1
321080	SWAT	GPS BALALAI	Gulibagh								1	1
321081	SWAT	GPS BARA DURESHKHELA	Dureshkhela								1	1
321082	SWAT	GPS BEHRAIN	Behrain								1	1
321083	SWAT	GPS BELA BATAKA	Shah Dehrai								2	2
321084	SWAT	GPS BODAY GHAR	AKMB								2	2
321085	SWAT	GPS BODIGRAM	Baidara								1	1
321086	SWAT	GPS CHARBAGH	Charbagh								1	1
321087	SWAT	GPS CHARMA	Gwaleari								1	1
321088	SWAT	GPS CHATIKAL	Beha								1	1
321089	SWAT	GPS CHINDA KHWARA	Bar Aba Khel								1	1
321090	SWAT	GPS DARA DABARGAY	Bashigram								2	2
321091	SWAT	GPS DARA PARAI	Barikot								1	1
321092	SWAT	GPS DARDYAL	Tall								1	1
321093	SWAT	GPS DEDAWAR	Shamozai								1	1
321094	SWAT	GPS DITPANAI	Matta/Kharerai								1	1
321095	SWAT	GPS FAZAL ABAD DEOLAI	Deolai								1	1
321096	SWAT	GPS GANORAI	Kokarai								1	1
321097	SWAT	GPS GARDAM	Beha								1	1
321098	SWAT	GPS GOLDEN	Deolai								1	1
321099	SWAT	GPS JALOO	AKMB								1	1
321100	SWAT	GPS JANIMAR	Tirat								2	2
321101	SWAT	GPS KABAL KOO	Gwaleari								2	2
321102	SWAT	GPS KALAM OLD	Kalam								2	2
321103	SWAT	GPS KANATAI	Gwaleari								1	1
321104	SWAT	GPS KANJU NO 2	Kanju								1	1
321105	SWAT	GPS KIDAM	Balakot								1	1
321106	SWAT	GPS KOZ BARGIN	Shin								2	2
321107	SWAT	GPS MAHAK	Kalakalay								1	1
321108	SWAT	GPS MANDAN	AKMB								2	2
321109	SWAT	GPS MANGLOR NO 2	AKMB								1	1
321110	SWAT	GPS MIANDAM	Miandam								1	1
321111	SWAT	GPS NAZAR ABAD	Arkot								1	1
321112	SWAT	GPS PINDA SHAH PATAY	Koz Aba Khel								2	2
321113	SWAT	GPS QANDIL	Qandail								1	1
321114	SWAT	GPS RADOKRAI	Barthna								1	1
321115	SWAT	GPS SAMBAT	Baidara								1	1
321116	SWAT	GPS SAMBAT CHAM	Baidara								1	1
321117	SWAT	GPS SHAHEED BABA NO.2	Kanju								1	1
321118	SWAT	GPS SHAKAR DARA	Pir Kalay								1	1
321119	SWAT	GPS SHALKYAR	Bashigram								1	1
321120	SWAT	GPS SHER PALAM NO.2	Pir Kalay								1	1
321121	SWAT	GPS SHORSHAHI	Shawar								2	2
321122	SWAT	GPS SIBANR	Arkot								1	1
321123	SWAT	GPS SIRSENAI NO.2	Bar Aba Khel								1	1
321124	SWAT	GPS TALIGRAM	Taligram R/S-18								1	1
321125	SWAT	GPS TALINGA	Tirat								2	2
321126	SWAT	GPS TANGBANR	Pir Kalay								1	1
321127	SWAT	GPS TANGO	Shalpin R/S-22								1	1
321128	SWAT	GPS ZIARAT SWEGALAI	Koz Aba Khel								1	1
321129	SWAT	GPS ZWALA	Jano/Chamtalai								1	1
321130	SWAT	GPS.JAGAH	Behrain								1	1
321131	SWAT	GPS.TOTANO BANDAI	Totano Bandai								1	1

T.C,
5/11/2014

(AT) (9) (16) Annexure "D"

OFFICE OF THE DISTRICT EDUCATION OFFICER
(M) SWAT AT GULKADA
Cell # 0946 9240209-228

OFFICE ORDER

Annex-C

Consequent upon the post of AT of the following schools advertised through NTS, the District Education officer Swat is pleased to transfer/ adjust the Arabic Teachers of these schools on their own pay and scale at the school noted against each against vacant AT post in the interest of public service with immediate effect.

S. #	Name of Teacher	From	To	Remarks
1	Mr. Muhammad Tayyab AT	GHS: Sibbanr	GMS: Sar Banda	Against vacant AT post.
2	Mr. Muhammad Ishaq SAT	GHS: Gaaloch	GHS: Dardeyal	Against vacant AT post.
3	Mr. Ghulam Hussain AT	GMS: Aligram	GMS: Mahak	Against vacant AT post.
4	Mr. Abdullah AT	GMS: Dakerak	GMS: ~~Sar Banda~~ Manpetai	Against vacant AT post.
5	Mr. Watan Karam AT	GMS: Damana	GMS: Toor Wall	Against vacant AT post.
6	Mr. Nadar Khan AT SAT	GHS: Ashoran	GHS: Mankeyal	Against vacant AT post.
7	Mr. Minhaj Ahmad AT	GMS: Asharbanr	GHS: Chancharuy	Against vacant AT post.

NOTE: Compliance reports should be submitted to all concerned.

(MUHAMMAD UZAIR ALI)
DISTRICT EDUCATION OFFICER
(MLAE) SWAT AT GULKADA

Endst No. 65-68 /NTS/Apptt: 2014 dated 2/9/14

Copy of the above is forwarded to: -

1. The Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
2. The District Comptroller of Accounts Swat.
3. The Budget & Accounts officer local office.
4. The Principal GHSS/GHS and GMS: concerned.

T.C. of ZEO 3/11/2014

DISTRICT EDUCATION OFFICER
(MLAE) SWAT AT GULKADA

2/9/14

Annex-C

~~ANNEXURE-C~~

Annex-D

(10)

This is an appeal filed by Mr. Ghulam Hussain today on 05/11/2014 against the order dated 02.09.2014 against which he preferred/made a departmental appeal on 13.09.2014 the period of ninety days is not yet lapsed as per section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, which is premature as laid down in an authority reported as 2005-SCMR-890.

As such the instant appeal is returned in original to the appellant/counsel. The appellant would be at liberty to resubmit fresh appeal after maturity of cause of action and also removing the following deficiencies.

1- Memorandum of appeal may be got signed by the appellant.
2- Address of respondent No.4 is incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
3- Affidavit may be got attested by the Oath Commissioner.
4- Page No.11 of the appeal is illegible which may be replaced by legible/better one.
5- Six more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1575 /ST,

Dt. 5 - 11 -/2014

5/11/2014

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Tariq Aziz Adv. Swat.

Annex-D

~~46~~ Annex-E

(11)

OFFICE OF THE
DISTRICT EDUCATION OFFICER (MALE)
Swat (Cell # 0946 9240309-228)

APPOINTMENT

Consequent upon recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the vacant AT posts on one year Ad hoc School based policy in BPS: 15 (Rs.8500-700-29500) Fixed plus usual allowances as admissible under the Rules and existing policy of the Provincial Government, in Teaching Cadre on the terms & conditions given below with effect from the date of their taking over charge.

S. #	Name of candidate	Father's Name	D/O Birth	Score	Remarks
1	Mr. Zaiul Haq	Rashid Khan	10.02.1987	125.26	GHS: Shawar
2	Mr. Mahboob Ur Rahman	Azizur Rahman	01.03.1985	124.12	GHSS: Kishawra
3	Mr. Muhammad Atta ul Haq	Muhammad Khaleeq	05.03.1986	123.81	GHS: Sijbanr
4	Mr. Miftahud Din	Fazal Naeem	14.04.1982	123.26	GHSS: Shamozi
5	Mr. Kifayat Ullah	Aziz ur Rahman	01.03.1985	122.78	GMS: Bihar
6	Mr. Shahid Iqbal	Hamid Iqbal	17.07.1987	121.17	GMS: Kotu
7	Mr. Saleem Ullah	Faqir Muhammad	20.04.1987	121.03	GMS: Gabral
8	Mr. Bakht Muhammad	Fazal Ghafoor	06.02.1981	120.44	GMS: Dad
9	Mr. Saeed ur Rahman PST GPS: No.01 Qambar	Abdur Rahman	01.03.1978	119.43	GMS: Galoch
10	Mr. Atta ur Rahman PST GPS: Jur Bandai	Muhammad Amin	01.02.1974	117.77	GMS: Charma
11	Mr. Saleem Ullah Khan PST	Aslam Khan	15.04.1982	117.54	GHS: Gat
12	Mr. Abdul Hai	Sajdun Nas	14.12.1984	117.31	GHS: Manai
13	Mr. Sard Jahan Shah PST GPS: Babo	Muhammad Kamal	01.04.1977	117.18	GMS: Chinkolai
14	Mr. Sohrab	Muhammad Azim	15.04.1983	116.9	GHS: Shalhand
15	Mr. Rafiq Ahmad	Saeed Ahmad	10.04.1982	116.27	GMS: Lakhar
16	Mr. Atta Ullah	Sher Zada	28.02.1984	116.09	GMS: Asharbanr
17	Inam Ullah PST GPS: Bakar	Sher Zaman Khan	12.04.1982	116.08	GMS: Dakorak
18	Mr. Zia Ullah	Muhammad Ishaq	10.02.1987	115.41	GHS: Topsin
19	Mr. Noor ul Hadi	Abdul Ahad	12.04.1982	115.17	GHS: Chail
20	Mr. Umar Hadi	Abdur Raziq	02.03.1985	114.83	GHS: Gurnai
21	Mr. Izaz Karam	Muhammad Karam	04.04.1980	114.74	GMS: Damana
22	Mr. Muhammad Seddique	Muhammad Shafique	02.07.1982	114.63	GHS Qandil
23	Mr. Niaz Badshah	Bakht Bad Shah	10.04.1983	114.42	GHS: Kidam
24	Mr. Shahid Hussain	Wali Ahad	02.03.1987	114.42	GMS: Bar Bargin
25	Atta Ullah	MUHAMMAD AZIZ	01.04.1977	114.36	GHS: Ashoran
26	Ikram Ullah	Bahramand	01.01.1992	114.03	GMS: Tirat

T.C 12/12/14

Annex-E

(16 B)

(12)

27	Abdul Ghafar	Farooq Shah	01.04.1987	111.87	GMS Alpuri
28	Mr. Akbar Ali	Anwar Ali Shah	12.05.1958	111.87	GMS
29	Mr. Neamat Ullah	Hazrat Shah	10.04.1978	107.09	GMS Am

Terms & Conditions

1. No TA/DA is allowed.
2. Charge reports should be submitted to all concerned.
3. Appointment is purely on temporary & ad hoc basis for one year with effect from 01.10.20[illegible] 30.09.2015.
4. He should not be handed over charge if he exceeds 38 (Thirty Eight) years of below 18 years of age.
5. Appointment is subject to the condition that the certificates/documents must be verified from concerned authorities, anyone found producing bogus certificate will be reported to the law enforcing agencies for further action.
6. His services are liable to termination on one month's prior notice from either side. In case of resignation without notice his one month pay /allowances shall be forfeited to the Government.
7. Pay shall not be drawn until and unless a certificate issued by this office that his documents verified
8. He should join his post within 30 days of the issuance of this notification. In case of failure to join the post within 30 days of the issuance of this Notification his appointment shall stand cancelled automatically and no subsequent appeal etc shall be entertained.
9. Health & Age Certificate should be produced from the Medical Superintendent before taking charge.
10. He will be governed by such Rules and Regulation as may be issued from time to time by the Government.
11. His services shall be terminated at any time in case his performance is found unsatisfactory during the service period. In case of misconduct, he shall be proceeded under the relevant rules & regulations announced from time to time.
12. His appointment is Ad hoc and school based. He shall have to serve at the place of posting, his service is not transferable to any other station.
13. Before handing over charge his documents may be checked and if found bogus or irrelevant to the qualification and rules charge of the post may not handed over.

T.C.
12/12/14

(Prof. MUHAMMAD UZAIR ALI)
DISTRICT EDUCATION OFFICER
SWAT GULKADA

30/9/14

Endst No: 1454-1518/AT/Appointment/Ad hoc/NTS dated:30 /09/2014

Copy of the above is forwarded for information & necessary action to: -

1. The Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. The District Comptroller of Accounts Swat.
3. The Principal/ Headmaster concerned.
4. The Deputy DEO Male local office.
5. The B&AO Local office
6. The Supdt Secondary local office.
7. The candidate concerned.
8. PA to D E O local office.

DISTRICT EDUCATION OFFICER
(MALE) SWAT GULKADA

D/Appeal 13/9/14 (17) Annexure "

(13)

بخدمت جناب ڈسٹرکٹ ایجوکیشن آفیسر (مردانہ) سیدو شریف سوات

No. 2580 جناب عالی! 15-9-2014

عنوان: اپیل بابت تنسیخ ٹرانسفر آرڈر 68-65 مورخہ 02/09/014

معزز DEO(M) صاحب:

میں عرض گزار یوں کہ میں بحیثیت AT معلم گورنمنٹ مڈل سکول علیگرامہ میں یکم جون 2013 سے تبادلہ تک فرائض منصبی انجام دے رہا ہوں۔ اور مجھے سکول ھذا سے بغیر کسی وجہ/شکایت گورنمنٹ مڈل سکول چملک کو تبدیل کیا ہے۔ جو کہ سراسر نا انصافی اور غیر قانونی ہے۔ اور آفس آرڈر میں AT پوسٹ کو خالی ظاہر کیا ہے۔

اور سکول ھذا میں 15 مہینوں سے اپنی فرائض منصبی انجام دے رہا ہوں۔ اور مجھے کوئی وجہ بغیر GMS چیک میں Adjust کیا ہے۔ جو کہ خلاف قانون اور Transfer Rules کے کھلم کھلا خلاف ورزی ہے۔

T.C. 5/11/2014

لہٰذا آپ صاحبان میربانی فرما کر میرے ٹرانسفر آرڈر کو منسوخ کر کے مجھے GMS علیگرامہ میں تعینات کر دیں۔ تو عین نوازش ہوگی۔

(آرڈر کاپی لف ہے)

فقط

غلام حسین AT
GMS علیگرامہ سوات
مورخہ 13-09-014

Forwarded in original to the DEO(M) for further (N/A) pleas.

Head Master,
Govt: Middle School,
Aligrama, Distt: Swat.

BEFORE THE SERVICE TRIBUNAL K.P.K PESHAWAR

Service Appeal No 1402 of 2014

Ghulam Hussain AT (BPS-15) GMS Aligrama, Distric Swat.
..... Appellant

VERSUS

Secretary Elementary & Secondary Education K.P.K. Peshawar and others. .....Respondents

Rejoinder on behalf of appellant in response to Parawise comments filed by respondent No. 1 to 3

Respectfully Sheweth!

The appellant submits as under;

That all the preliminary objections raised by respondents No. 1 to 3 are illegal, against facts and devoid of all legal force therefore, the preliminary objections No. 1 to 4 are totally baseless.

FACTS:

1. That Para No. 1 of the comments needs no reply.
2. That Para No. 2 of the comments needs no reply.
3. That in response to Para No. 3 of the comments, it is explained that when alleged advertisement was made, the appellant was already on service in pursuance of an order of appointment passed by the competent authority but the respondent disregard of law and facts has advertised the same post as vacant and in consequence thereof proceedings were illegally conducted by the answering respondents, while concealing the material facts regarding the occupation of the same post by the appellant. The answering respondents have concealed the material facts from this honorable court and the comments of the respondents are misleading one therefore the reply to Para

No. 3 of the appeal is devoid of all legal force, hence, requires to be ruled out of consideration.

4. That Para No. 4 of the comments is also incorrect and misleading one. The answering respondents have admitted the material facts regarding the appointment/occupation of the appellant in service, the respondents have time and again twisted the facts by filing the misleading comments which are irrelevant against facts and thus the comments of the respondents lacks all sort of veracity.
5. That Para No. 5 of the comments is also the against the facts as stated above the service of the appellant was transferred in utter disregard of transfer and posting policy just to adjust the blue eyed of the answering respondents on the basis of political indulgence.
6. That in response to Para No. 6 it is explain that returned of appeal on account of prematurity and deficiency does not debar the appellant from filing the same after maturity and removing deficiencies. This Para No. 6 relates to the Courts procedure.
7. That Para No. 7 is against Facts and law the impugned orders are against rules and posting and transfer policy.

Grounds;

1) That Para No. 1 is incorrect hence, denied.
2) That Para No. 2 is incorrect hence, denied.
3) That Para No. 3 is incorrect hence, denied.
4) That Para No. 4 is incorrect hence, denied.
5) That Para No. 5 needs no reply.
6) That Para No. 6 is incorrect and misleading one hence, denied.
7) That Para No. 7 needs no reply.

It is therefore humbly prayed that on acceptance of this rejoinder the comments filed by respondents No. 1 to 3 being devoid of legal and factual force be ruled out of consideration.

Appellant
Through Counsel.

TARIQ AZIZ
Advocate High Court

Dated: 06-10-2015

KHYBER PAKHTUNKWA SERVICE TRIBUNAL, PESHAWAR

No. 747 /ST Dated 13 / 4 / 2017

To

The District Education Officer Male,
Government of Khyber Pakhtunkhwa,
Swat.

Subject: - **JUDGMENT**

I am directed to forward herewith a certified copy of Judgement dated 5.4.2017 passed by this Tribunal on the above subject for strict compliance.

Encl: As above

REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.