

FORM OF ORDER SHEET

Part of _____

Appeal No. 412/2024

Order or other proceedings with signature of judge

3

19/03/2024

The appeal of Mr. Mahroof Khan refiled today by registered post by him. It is fixed for preliminary hearing before touring Single Bench at A.Abad on ~~23-04-2024~~ Appellant has been informed telephonically.

By the order of Chairman



REGISTRAR

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
CHECK LIST

CASE TITLE: MAHROOF KHAN

V/S Govt of KPK Through Secretary ERSE, Sohar

S#	CONTENTS	YES	NO
1	This Appeal has been presented by:	✓	
2	Whether Counsel/Appellant/Respondent/Deponents have signed the requisite documents?	✓	
3	Whether appeal is within time?	✓	
4	Whether the enactment under which the appeal is filed mentioned?	✓	
5	Whether the enactment under which the appeal is filed is correct?	✓	
6	Whether affidavit is appended?	✓	
7	Whether affidavit is duly attested by competent Oath Commissioner?	✓	
8	Whether appeal/annexures are properly paged?	✓	
9	Whether certificate regarding filing any earlier appeal on the subject, furnished?	x	✓
10	Whether annexures are legible?	✓	
11	Whether annexures are attested?	✓	
12	Whether copies of annexures are readable/clear?	✓	
13	Whether copy of appeal is delivered to AG/DAG?	✓	
14	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	✓	
15	Whether numbers of referred cases given are correct?	✓	
16	Whether appeal contains cutting/overwriting?	x	✓
17	Whether list of books has been provided at the end of the appeal?	✓	
18	Whether case relate to this court?	✓	
19	Whether requisite number of spare copies attached?	✓	
20	Whether complete spare copy is filed in separate file cover?	✓	
21	Whether addresses of parties given are complete?	✓	
22	Whether index filed?	✓	
23	Whether index is correct?	✓	
24	Whether Security and Process Fee deposited? On _____		
25	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On _____		
26	Whether copies of comments/reply/rejoinder submitted? On _____		
27	Whether copies of comments/reply/rejoinder provided to opposite party? On _____		

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name: MAHROOF KHAN Dy BES (Male)

Signature: 

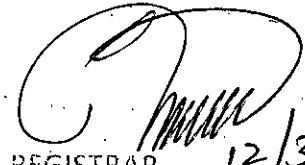
Dated: 11-03-2024

The appeal of Mr. Mahroof Khan received today i.e. on 11.03.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- According to sub-rule-4 of rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974 respondent no. 1, 3 and 4 are un-necessary/improper parties, in light of the rules and on the written direction of the Worthy Chairman the above mentioned respondent number be deleted/struck out from the list of respondents.
- 2- Appeal has not been flagged/marked with annexures marks.
- 3- Annexures of the appeal are unattested.
- 4- Annexure-C of the appeal is illegible which may be replaced by legible/better one.

No. 549 /S.T.

Dt. 11/3 /2024.



12/3/24

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mahroof Khan Appellant

صنا عالی

حسب ہدایت فائل میں سے تمام کمپوں کو دور کر کے
فائل دوبارہ مناب کی خدمت میں جمع کرائی جاتی ہے۔

شکریہ

معروف خان
ڈپٹی ڈی ای او
15/3/2024

Appellant

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

Service appeal No. 412 -A/2024

Mahroof Khan Deputy District Education Officer (DDEO) (Male) District
Mansehra.

...APPELLANT

VERSUS

Government of Khyber Pakhtunkhwa through Secretary Elementary &
Secondary Education, Khyber Pakhtunkhwa Peshawar and others.

...RESPONDENTS

SERVICE APPEAL

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3.	Copy of Notification dated 10.08.2022	13	"B"
4.	Copy of order/Notification No. SO(MC)E&SED/2-3/2022/ Promotion/ MC(BS 17 to 18) ACB, dated 17/02/2023	14-15	"C"
5.	Copy of letter dated 03/08/2023	16	"D"
6.	Copy of impugned notification dated 06/12/2023	17	"E"
7.	Copy of departmental appeal	18	"F"
8.	Wakalatnama		


...APPELLANT
In Person

Dated: _____/2023

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

Service Appeal No. 412-1/2024

Mahroof Khan Deputy District Education Officer (DDEO) (Male) District
Mansehra.

...APPELLANT

VERSUS

1. Government of Khyber Pakhtunkhwa through Chief Secretary
Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar.
2. Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa
Peshawar.
3. Director Elementary & Secondary Education, Khyber Pakhtunkhwa
Peshawar.
4. District Education Officer (Male), Mansehra.
5. Shams ur Rehman, SDEO (Male), Balakot District Mansehra.

*Government of Khyber Pakhtunkhwa
Secretary Elementary & Secondary Education
Peshawar*
Diary No. 11705
Dated 11-03-2024

...RESPONDENTS

SERVICE APPEAL UNDER SECTION 4 OF KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 FOR
DECLARATION TO THE EFFECT THAT
NOTIFICATION NO. SO(MC)E&SED/4-16/2023/
DDEO/SDEOS/MANSEHRA DATED 06/12/2023
ISSUED BY RESPONDENT NO. 2, WHEREBY, HE
TRANSFERRED AND POSTED THE PRESENT
APPELLANT FROM THE POST OF DEPUTY
DISTRICT EDUCATION OFFICER (MALE)
MANSEHRA TO DEPUTY DISTRICT EDUCATION
OFFICER (MALE) TORGHAR AND RESPONDENT
NO. 5 IS POSTED AGAINST THE POST OF
PRESENT APPELLANT IN OPS, WHICH IS

Filed to-day
[Signature]
Registrar
11/3/24

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

Service Appeal No. 412 -A/2024

Mahroof Khan Deputy District Education Officer (DDEO) (Male) District
Mansehra.

...APPELLANT

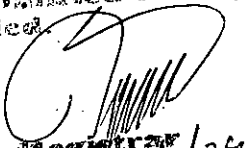
VERSUS

1. Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa
Peshawar.
2. Shams ur Rehman, SDEO (Male), Balakot District Mansehra.

...RESPONDENTS

SERVICE APPEAL UNDER SECTION 4 OF KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 FOR
DECLARATION TO THE EFFECT THAT
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DDEO/SDEOS/MANSEHRA DATED 06/12/2023
ISSUED BY RESPONDENT NO. 1, WHEREBY, HE
TRANSFERRED AND POSTED THE PRESENT
APPELLANT FROM THE POST OF DEPUTY
DISTRICT EDUCATION OFFICER (MALE)
MANSEHRA TO DEPUTY DISTRICT EDUCATION
OFFICER (MALE) TORGHAR AND RESPONDENT
NO. 2 IS POSTED AGAINST THE POST OF
PRESENT APPELLANT IN OPS, WHICH IS

Re-submitted to -day
and filed.


Registrar
19/3/24

ILLEGAL, UNLAWFUL, WITHOUT LAWFUL AUTHORITY, WITHOUT JUSTIFICATION, PERVERSE, ARBITRARY, FANCIFUL, AGAINST THE RULES, TRANSFER POSTING POLICY AND LAW ON THE SUBJECT. HENCE, INEFFECTIVE UPON THE RIGHTS OF THE APPELLANT.

PRAYER: ON ACCEPTANCE OF THE INSTANT SERVICE APPEAL, THE IMPUGNED NOTIFICATION NO. SO(MC)E&SED/4-16/2023/DDEO/SDEOS/ MANSEHRA DATED 06/12/2023 ISSUED BY RESPONDENT NO. 1 MAY GRACIOUSLY BE ORDERED TO BE SET-ASIDE/CANCELLED. ANY OTHER RELIEF WHICH THIS HONOURABLE COURT DEEMS FIT AND PROPER IN THE CIRCUMSTANCES OF THE CASE MAY ALSO BE GRANTED TO THE APPELLANT.

Respectfully Sheweth;-

The facts giving rise to the instant appeal are arrayed as under;-

1. That the appellant is serving in the respondents' department as Deputy District Education Officer (Male) Mansehra (BPS-18) and leaving no stone unturned in the smooth functioning of the department.
2. That the appellant was transferred and posted Deputy District Education Officer (Male) Mansehra (BPS-18), the appellant took over charge of the said post and run the show of the

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department with complete devotion, dedication and entire satisfaction of his superiors.

3. That the appellant was posted as Deputy DEO (Male) Mansehra vide Notification No. SO(MC)E&SED/4-16/2021/Posting/ Transfer/MC dated 13.01.2022. On the basis of merit of hard work and on the principle of seniority.
4. That one Raja Jahangir challenged the said order before the Honourable Service Tribunal Khyber Pakhtunkhwa Peshawar and got suspended the said order/notification. As a result, the said Raja Jahangir was appointed as per direction of Service Tribunal as Deputy DEO (Male) Mansehra.
5. That during the pendency of service appeal before the Honourable Services Tribunal, the said Raja Jahangir was transferred from Mansehra to District Haripur as Deputy DEO (Male) Haripur vide order/ Notification No. SO(MC)E&SED/ 4-16/2022 dated 14.07.2022. Copy of order dated 14.07.2022 is attached as Annexure "A".
6. That in case of transfer of the Raja Jahangir from Mansehra to Haripur, service appeal of the said officer was gone infructuous and the order of the appellant as Deputy DEO (Male) Mansehra Notification No. SO(MC)E&SED/4-16/2021/ Posting/ Transfer/MC dated 13.01.2022 was restored. In the meanwhile the present respondent No. 2 who was junior to the appellant has illegally been posted from District Abbottabad to Mansehra as Deputy DEO (Male) vide

Notification No. SO(MC)E&SED/4-16/2021/ Posting/ Transfer/MC, dated 10.08.2022. Copy of Notification dated 10.08.2022 is annexed as Annexure "B".

7. That appellant filed service appeal before the Honourable Service Tribunal challenging the said illegal and unlawful Notification dated 10/08/2022.
8. That in consequence of the said appeal, the appellant was posted and adjusted against the post of Deputy District Education Officer, (Male) Mansehra vide order/Notification dated 17/02/2023. Copy of order/Notification No. SO(MC)E&SED/2-3/2022/ Promotion/MC(BS 17 to 18) ACB, dated 17/02/2023 is annexed as Annexure "C".
9. That after announcement of General Election by the Election Commission of Pakistan, the District Education Officer (Male) Mansehra in consequence of letter No. F.5(61)/2023-LGE (DECM) dated 11/07/2023 issued by the Election Commission of Pakistan nominated the present appellant as Focal Person in connection with Electoral Affairs through Endst. No. 6994 dated 03/08/2023. Copy of letter dated 03/08/2023 is annexed as Annexure "D".
10. That after lapse of about 10 months, the appellant is again transferred and posted from the post of Deputy District Education Officer (Male) Mansehra to the post of Deputy District Education Officer Torghar vide impugned Notification No

SO(MC)E&SED/ 4-16/2023/ DDEO/SDEOS/ Mansehra dated 06/12/2023 and the respondent No. 2 who is junior to the appellant and serving in BPS-17 is posted and adjusted against the post of present appellant Deputy DEO (Male) Mansehra in own pay and scale. Copy of impugned notification dated 06/12/2023 is annexed as Annexure "E".

11. That it is a settled principle of law that no officer is posted where senior officer is available. Now, the appellant is suffering mental agonies due to the frequent transfer and posting from the last two years and also facing hardships in far-flung hard area i.e. District Torghar and a junior officer is posted against the post of appellant in a settled district in his own pay and scale.
12. That the appellant approached the respondents' department and requested to withdraw/cancel the impugned Notification dated 06/12/2023 and restore the previous position of appellant but after lapse of 03 months / stipulated period the respondents has not decided the fate of the departmental appeal. Copy of departmental appeal is annexed as Annexure "F".
13. That being not satisfied from the impugned Notification dated 06/12/2023 of the respondent No. 1, the present appellant assailed the same by filling instant service appeal, inter-alia, amongst other;-

GROUND:-

- a) That, the impugned Notification dated 06/12/2023 issued by the respondent No. 1 regarding transfer and posting of the appellant is illegal, unlawful, without lawful authority, arbitrary, perverse, discriminatory and consequently of no legal effects upon the rights of appellant.
- b) That the impugned act/Notification dated 06/12/2023 issued by the respondent No. 1 is against the law, rules and policy on the subject, hence, not maintainable and is liable to be set-aside.
- c) That the impugned Notification of posting/transfer of appellant is premature, perverse and illegal. It has been settled by the Superior Courts in so many judgments that when law mandated a thing which is to be done in particular manner that should be done in that prescribed manner not otherwise. In case of violation of above proportion, the Honourable Superior Courts took a serious in case of such eventualities.
- d) That the impugned notification dated 06/12/2023 issued by respondent No. 1 is also not maintainable and liable to be set-aside on the ground that the respondent No. 4 has nominated the appellant as Focal Person in connection with Electoral Affairs for up-coming General Elections 2024 on the directions of Election Commission of Pakistan.

- e) That the present appellant has served at a hard and far-flung stations of District Abbottabad, District Mansehra, District Shangla during his service. The appellant was posted and adjusted against the post of Deputy District Education Officer (Male) Mansehra on the basis of seniority and ability vide Notification dated 13/01/2022 which was later on challenged by another officer. Due to the transfer of said officer from the office of respondent No. 3 to District Haripur. Thereafter, the present respondent No. 2 was posted as SDEO Abbottabad was transferred and adjusted against the post of appellant as Deputy District Education Officer (Male) Mansehra.
- f) That thereafter vide order/Notification dated 20/02/2023 the appellant was transferred/adjusted as Deputy District Education Officer (Male), Mansehra. The appellant assumed the charge of his post and is serving best of his ability for the smooth functioning of department.
- g) That now through the impugned Notification dated 06/12/2023 after lapse of about 10 months the appellant was again transferred and posted from the post of Deputy District Education Officer (Male) Mansehra to the post of Deputy District Education Officer (Male), Torghar without completing his

tenure. Therefore, the impugned Notification is liable to be set-aside/cancelled.

- h) That the appellant has been made a shuttle cock since last two years. Mostly the appellant was posted/ transferred prematurely. Therefore, the impugned Notification dated 06/12/2023 is not maintainable and is liable to be set-aside.
- i) That it is pertinent to note here, that it is a settled principle of law that no junior officer is posted at similar place where senior officer is available. The respondent No. 2 is serving in BPS-17 as Sub-Divisional Education Officer while the appellant being senior most from the respondent No. 2 is presently serving in BPS-18 as Deputy District Education Officer (Male), Mansehra. Hence, the impugned notification is liable to be cancelled.
- j) That it is well settled by now that Article 199 casts an obligation on the High Court to act in Aid of law, protect the rights of the citizens within frame work of the Constitution against infringement of law and constitution by the executive authorities, strike a rational compromise and fair balance between the rights of the citizens and action of the state functionaries, claimed to be larger interest of the society. A power is conferred on the High Court under the constitution and is to be exercised subject to

constitutional controlled executive action so as to bring it in conformity with the law. Whenever, the executive acts in violation of the law an appropriate order can be granted, which will relieve the citizen of effects of illegal action. It is an omnibus article under which relief can be granted to the citizen of the country against infringement of any provision of law or of the constitution. If the citizen of this country are deprived of the guarantee given to them under the constitution, illegally or, not accordance with law then Article 199 can always be invoked for redress.

- k) That even otherwise, there was no lawful justification with the respondent No. 1 to transfer the appellant. Even if the respondents were desirous to facilitate the respondent No. 2, he could have been adjusted in some other station. This act of the respondents depicts malafide on their part. Hence, the impugned notification is liable to be set-aside.
- l) That, the respondent No.2 transferred/posted/ adjusted the appellant without mentioning any reasons by ignoring all the rules, regulations and policy on the subject, hence, the impugned order is liable to set-aside/cancelled.

- m) That the impugned Notification if seen from any angle, both factually and legally is not maintainable, hence, liable to be set-aside.
- n) That the other grounds shall be urged at the time of arguments with the leave of this Honourable Court.

Under the circumstances it is respectfully prayed that on acceptance of the instant service appeal, the impugned Notification No. SO(MC)E&SED/4-16/2023/ DDEO/SDEOS/ Mansehra dated 06/12/2023 issued by respondent No. 1 may graciously be ordered to be set-aside/cancelled and respondents be directed not to compel the appellant to relinquish his charge as Deputy District Education Officer (Male) Mansehra. Any other relief which this Honourable Court deems fit and proper in the circumstances of the case may also be granted to the appellant.


...APPELLANT
In Person

Dated: _____/2024

VERIFICATION:-

Verified on oath that the contents of foregoing service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.


...APPELLANT
In Person

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

Service appeal No. _____ -A/2024

Mahroof Khan Deputy District Education Officer (DDEO) (Male) District
Mansehra.

...APPELLANT

VERSUS

Government of Khyber Pakhtunkhwa through Secretary Elementary &
Secondary Education, Khyber Pakhtunkhwa Peshawar and others.

...RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, *Mahroof Khan Deputy District Education Officer (DDEO) (Male)*
District Mansehra, do hereby solemnly affirm and declare that the contents
of foregoing service appeal are true and correct and nothing has been
concealed therein from this Honourable Court.



DEPONENT



Annex A

A



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

Dated Peshawar the July 14th 2022**NOTIFICATION**

NO.SO(S/F)/E&SE/4-16/2022/: The following posting transfer order of Mangment Cadre officers are hereby ordered with immediate effect, in the best public interest.

Sr. No	Name & Designation	From	To
01	Mr. Raja Babu Jehangir (MC BS-17)	Deputy DEO in (OPS) (Male) Manshra	Deputy DEO in (OPS) (Male) Haripur.
02	Mr. Fazal Qadir (MC BS-17)	SDEO (Male) Ogai, Manshra	SDEO (Male) Khanpur, Haripur

2. No TA/DA is allowed.

SECRETARY
ELEMENTARY & SECONDARY
EDUCATION DEPARTMENT

Endst: of even No. & date:

- Copy forwarded to the:
1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
 2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
 3. District Education Officers (Male) Manshra, Haripur & Shangla.
 4. District Accounts Officer, Manshra, Haripur & Shangla.
 5. Director EMIS, E&SE Department.
 6. PS to Secretary, E&SE Department.
 7. Officer concerned.
 8. Office order file.

(NASEER ABBAS KHALIL)

OFFICER (Management Cadre)

14.7.22.

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Answer B



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. (921-9223588)

Dated Peshawar the August 10th, 2022

NOTIFICATION

NO. SO(MC)E&SED/4-16/2021/POSTING/TRANSFER/MC: The following posting / transfers of Male Management Cadre Officers are hereby ordered with immediate effect, in the best public interest as stop gap arrangement till further orders: -

Sr. No	Name of officer	From	To
1	Mr. Shams ur Rehman (MC BS-17)	SDEO (Male) Abbottabad	Deputy DEO (Male) Manshehra in OPS (AVP)
2	Mr. Ihsan Ullah (MC BS-17)	SDEO (Male) Landi Kotal Khyber	Deputy DEO (Male) Mohmand in OPS (AVP)

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

Endst: of even No. & date:

Copy forwarded for information to the: -

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

Naseer
10.08.22
(NASEER ABBAS KHALIL)
SECTION OFFICER (Management Cadre)

10/12

14

C

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Annex
Dated: 17th February 2023

NOTIFICATION

NO. SO/ MC/ L & SED/ 2-3/ 2022/ Promotion/ MC (BS-17 to 18) ACB: In pursuance of this Department's Notification of even number dated 12-12-2022 and subsequent approval from the Election Commission of Pakistan vide their letter No. F-3(1)/2023-ES dated 10/02/2023, the following posting/adjustment of officers of the Management Cadre are hereby ordered, in the public interest, with immediate effect:-

S#	Name of Officer	From	To	Remarks
1	Aamir-ur-Rahman	SDEO (M) Hasanzai Torghar	Deputy DEO (Male) Baltagram	Vice S No. 22
2	Luqman Haqim	SDEO(M) Kohat	Deputy DEO (Male) Karak	Vice S.No.18
3	Malik Khan	SDEO(i) Tank	Deputy DEO (Male) South Waziristan	Vice S.No.15
4	Shahid Hussain	Deputy DEO (M) Lower Chitral in OPS	Deputy DEO (Male) Lower Chitral	Against the already Occupied Post
5	Dilawar Khan	SDEO(M) Lachi Kohat	Deputy DEO (Male) North Waziristan	Vice S.No.19
6	Muqaddas Khan	Deputy DEO (M) Upper Chitral in OPS	Deputy DEO (Male) Upper Chitral	Against the already Occupied Post
7	Abdul Hamid	SDEO (M) Piry Thal Hangu	Deputy DEO (Male) Kohat	Vice S No.16
8	Kiramat Shah	SDEO (M) Babozai Swat	Deputy DEO (Male) Swat Upper	Vice S No.25
9	Meroof Khan	SDEO (M) Darban Manshehra	Deputy DEO (Male) Manshehra	Vice S No. 17
10	Naseer Ahmad	Deputy DEO (M) Abbottabad in OPS	Deputy DEO (Male) Abbottabad	Against the already Occupied Post
11	Ghulam Habib	SDEO (M) Samar Bagh Dir Lower	Deputy DEO (Male) Bajaur	Vice S.No.20
12	Mehboob Ellahi	SDEO (M) Drosh Lower Chitral	Deputy DEO (Male) Dir Lower	A.V.P
13	Muhammad Farooq	SDEO (M) Karak	Deputy DEO (Male) Orakzai	Vice S No.14
Consequential Posting/ Transfer				
14	Zahid Khan TC BS-18	Deputy DEO (Male) Orakzai	Principal (BS-18) GHS Spin South Waziristan	A.V.P
15	Khyal Muhammad TC BS-17	Deputy DEO (Male) South Waziristan	HM (BS-17) GHS Shakai South Waziristan	A.V.P
16	Qasir Khan MC BS-17	Deputy DEO (Male) Kohat in OPS	SDEO (Male) Lachi Circle Kohat	Vice S No 5
17	Shams Ur Rahman MC BS-17	Deputy DEO (Male) Manshehra in OPS	SDEO (Male) Balakot Manshehra	Services of Mr Ghulam Jilani (MC BS-16) are place at the disposal of DEO (M) Manshehra for further posting



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

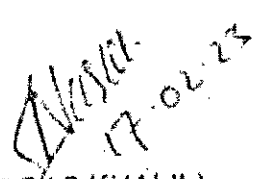
	Muhammad Hussain MC BS-17	Deputy DEO (Male) Karak in OPS	SDEO (Male) Karak	V S No 13
19	Said Muhammad TC BS-17	Deputy DEO (Male) North Waziristan in OPS	SS (Islamiyat) GHSS Erdak North Waziristan	A / P
20	Sher Nawab TC BS-18	Deputy DEO (M) Bajaur	Principal GHS Ghazi Baba Bajaur	A / P
21	Saleh Muhammad MC BS-17	SDEO (M) Chakaiser	SDEO (M) Babozai Swat	A / P
22	Mr Gul Bad Shah TC BS-18	Deputy DEO (Male) Battagram	Principal (BS-18) GHS Bana Allai Battagram	A / P
23	Wali Ur Rehman MC BS-17	SDEO (Male) Kalkot Dir Upper	SDEO (Male) Allai Battagram	V S No 24
24	Zarif Khan MC BS-17	SDEO (Male) Allai Battagram	SDEO Tank	V S No 3
25	Nazr Ul Islam Bacha TC BS-17	Deputy DEO Swat Upper in OPS	SS (Islamiyat) BS-17 GHSS Kabal Swat.	A / P
26	Mr. Shandi Gul TC BS-17	SDEO (M) Landi Kotal Khyber	SS (Pashto) GHSS Paindi Cheena Khyber	A / P
27	Mr. Raees Khan MC BS-17	Asst. Director, E&SE Peshawar	SDEO (M) Landi Kotal Khyber	V S No 28
28	Sardar Irshad Ali MC BS-17	Awaiting Posting	SDEO (M) Darban Mansehra	V S No 3
29	Mr. Misri Khan MC BS-18	Awaiting Posting	Deputy Director P&D-II, Directorate of E&SE Peshawar	V S No 30
30	Abdul Shakoor TC BS-17	Deputy Director P&D-II, in OPS Directorate of E&SE Peshawar	SS (Urdu) GHSS Dherai (Aipuri) Shangla	A / P

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

Endst: of even No. & date:

Copy forwarded for information to the: -

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


 (NASEER ABBAS KHALIL)
 SECTION OFFICER (Management Cell)

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OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MANSEHRA



No. 6994

Phone # 0997-382271 Fax # 0997-382244
E-mail Address: edoedu_mansehra@yahoo.com
Facebook Page: www.facebook.com/DEOMMANSEHRA
Dated: 03/08/2023

To

The District Returning Officer,
District Election Commissioner
Mansehra.

Subject: **NOMINATION OF FOCAL PERSON.**

Memo:-

Reference to your office letter No. F.5(61)/2023-LGE(DECM) dated 11-07-2023 Mr. Mahroof Khan Deputy District Education Officer of this office is hereby nominated pas focal person in connection with Electoral affairs.

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**DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA**

Endst No 6995-97

Dated 03/08/2023

Copy for information to:

1. The Director Elementary & Secondary Education Department Peshawar.
2. The Deputy Commissioner Mansehra.
3. Office Order File.



**DY: DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA**



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

Dated; 6th December, 2023

NOTIFICATION

NO.SO(MC)E&SED/4-16/2023/DDEO/SDEOs/Mansehra: The following posting/transfer of Management Cadre officers are hereby ordered with immediate effect, in the best public interest.

Sr#	Name	From	To	Remarks
1	Muhammad Maroof (MC) BS-18	DDEO (Male) Mansehra	DDEO (Male) Torghar	A.V.P
2	Mr. Shams Ur Rehman (MC) BS-17	SDEO (Male) Balakot, Mansehra	Deputy DEO (Male) Mansehra in OPS	V.S.No.1
3	Mr. Ghulam Jilani (MC) BS-16	ASDEO (Male) Circle Hungrai, Mansehra	SDEO (Male) Balakot, Mansehra in OPS	V.S.No.2

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

Endst: of even No.& date:

Copy forwarded for information to the: -

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

111/2023
G. 12. 2023
(IMRAN ZAMAN)

SECTION OFFICER (Management Cadre)

To

The Worthy Chief Secretary
Government of Khyber Pakhtunkhwa
Peshawar

Diary # 5663

Dated 8/12/23

Subject; **DEPARTMENTAL APPEAL:** AGAINST IMPUGNED NOTIFICATION NO.SO(MC)E&SED/4-16/2023/DDEO/SDEOs/MANSEHRA DATED 06/12/2023.

Respected Sir,

The appellant rights to submits as under:-

1. That the appellant is serving in District Mansehra as DDEO (Male) Mansehra and is serving with complete devotion, dedication and leave no stone unturned in the smooth functioning of the department, since 20/02/2023.
2. That the appellant is absolutely a law abiding employee of the department has no nexus with the political entities of the KP, therefore, a junior officer, namely Shams ur Rehman SDEO BPS-17 has illegally been posted from SDEO Balakot to Mansehra as Deputy DEO (Male) vide Notification No. SO(MC)E&SED/4-16/2023/DDEO/SDEOs/Mansehra, dated 06.12.2023.
3. That, it is a settled principle of law that no officer is posted where senior officer is available. Now, the appellant is suffering mental agonies and hardships to serve in far-flung, hard area i.e. District Torghar and a junior officer, is posted in a settle District in OPS, while my tenure is less than 10 months.

In view of the above, it is prayed that impugned notification No. SO(MC)E&SED/4-16/2023/DDEO/SDEOs/Mansehra, may be set-aside as per the principle of seniority/tenor and the appellant may be allowed to serve as Deputy DEO (Male) Mansehra with peace of mind and as per law.

Dated; 08/12/2023

(APPELLANT)
Mahroof Khan

Presently DDEO (M) Mansehra