### FORM OF ORDER SHEET

Court of\_\_\_\_

### Appeal No.

### 580/2024

Order or other proceedings with signature of judge Date of order S.No. proceedings 3 2 1 18/04/2024 The appeal of Mr. Wajid Ali Shah resubmitted 1today by Mr. Waqas Ali Shah Advocate. It is fixed for preliminary hearing before touring Single Bench at Swat on 07-05-2024 Parcha Peshi given to the counsel for the appellant. By the order of Chairman TRAR RÉGIS

The appeal of Mr. Wajid Ali Shah received today i.e on 08.04.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal is photo state copy which is not acceptable replaced the original one.
- 2- Memorandum of appeal is not signed by the appellant.<sup>∞</sup>
- 3- Copy of departmental appeal is unsigned/unattested
- 4- Departmental appeal having no date be dated 1/
- 5- Copy of application/appeal submitted by the appellant before departmental committee and decision of the committee mentioned in the memo of appeal are not attached with the appeal, be placed on it. V

) Chamber/gmail address and contact number of the counsel engaged  $\bigvee$  is not mentioned in the index of the appeal.

8/\_\_/S.T,-No. 16/4\_12024. Dt.

16/4/24 REGISTRAR

SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR.

Waqas Ali Shah Adv. High Court Peshawar.

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# Before the Honorable Provincial Service Tribunal Khyber Pakhtunkhwa

Appeal No 580/2024 Wajid Ali Shah S/O Said Hukam Shah (SST) General (BPS-16)

Presently posted at GHSS Naway Kalay Buner

### Versus

- 1. The Director (E&SE) Education Department Khyber Pakhtunkhwa Peshawar
- 2. The District Education Officer Male District Buner

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Appellant

Through:

Waqas Ali Shah Advocate High Court

Å.

# Before the Honorable Provincial Service Tribunal <u>Khyber Pakhtunkhwa</u> Appeal No 580 (2024

(l)

Wajid Ali Shah S/O Said Hukam Shah (SST) General (BPS- 16) Presently posted at GHSS Naway Kalay Buner

#### Versus

The Director (E&SE) Education Department Khyber Pakhtunkhwa Peshawar

**9**. The District Education Officer Male District Buner

Appeal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, whereby the respondent No.2 transferred the appellant vide impugned notification No.8013-19/ Rationalization/ SST dated 08/12/2023 on the basis of rationalization Policy from GCMHS Dagger No.1 to GHSS Nawakaly may be declare as illegal, vide-ab-inito and effective upon the right of the appellant and the same may be set aside in the best interest of justice.

### **Prayer of appeal:**

Arrester Arrester W Counsel-

On the acceptance of this service appeal the impugned notification/ order No.8013-19 Rationalization SST dated 08/12/2023 may kindly be set aside/ cancelled.

Precisely starting the facts of the case, out of which the present appeal/Petition arises are as under

- That the appellant as serving as (SST) General Teacher (BPS-16) at Buner education Department.
- That the appellant has been transferred from GCMHS Dagger No.1 to GHSS Naway Kalay wide Notification order No.8013-19/ Rationalization/ SST dated 08/12/2023 on the basis of rationalization policy which is illegal and ineffective upon the right of appellant.

(Copy of the Notification order is attached as Annexure "A").

When the de the stand of the course of the c

3. According to the policy base for 9<sup>th</sup> and 10<sup>th</sup> base classes, there would be two SST's General, One SST for Mathematics/ Physics and one for Biology/ Chemistry and afterwards 1.5 Teachers per section (i.e. 9<sup>th</sup> B and 10<sup>th</sup> B). so base on this criteria, for the base two section (9<sup>th</sup> A and 10<sup>th</sup> A) the teacher have in the school according to policy mention but for the remaining sections there is one surplus Teacher and the junior-most should be transferred.

(Copy of Policy is attached as annexure "B").

4. That it is important to mention here that according to seniority list there is another teacher who has appointed in 2015 and is Junior to the appellant. Because the appellant was appointed in 2014.

(Copy of seniority List is attached as Annexure "C").

5. That it is also pertinent to mention that if it has been determined by the date of appointment, then the appellant is Senior from the two other Teachers, based on the dated of appointment, because the ongoing Seniority case is also pending in Khyber Pakhtunkhwa Service Tribunal.

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6. That the appeal Committee has been formed consisting/ comprised of BPS-19 and BPS-20 officers after undue transfer order just to sort-out the matter of appellant and other aggrieved teachers. And the appellant has submitted an appeal and dated 11/12/2023 but the result of appeal is none. And the appellant have got the information from the unknown source that the committee has accepted his appeal, but the respondent No.2 being Personalize with appellant and political approach for other teachers, rejected the appeal of appellant which is ineffective upon the right of appellant and also against the due course of law.

( copy of appeal to appeal convites is pronexure ( 1)

7. That the ill and malafide intention of respondent No. 2 and being personalized with appellant is that the respondent No.2 constitutes an appeal committee after undue transfer order based on rationalization policy. The appeal committee accepted the appeal of appellant but the respondent No. 2 rejected the decision of appeal committee, and some of teachers subsequently returned to their old stations and other transfer to the near stations. Further the appeal committee held its meeting on 18 December while all order of transfer issued on 14/03/2023. Which showed that the order have already been decided even before Committee meeting.

# (Copy of orders is attached as Annexure "D").

8. That it is very important to mentioned here that the respondents No.2 issued the Rationalized order on Sunday 10/12/2023, while the date written on order is 18/12/2023 with the direction to take charge within three days just to expedite the implementation of the order, which is against the law of the land. And ineffective upon the right of the appellant.

• 9. That the appellant moved a departmental appeal bearing diary No. 959 dated 03/01/2024 before respondent No. 1. which is still pending, Moreso, the appellant moved an application for disposal of departmental appeal for immediate disposal, but without any result, till date. And this order was issued in such a crucial time where as the students and teachers were in revision process and will waste the precious time of the students.

5

(Copy of appearles . is attached as annexure "E").

That the appellant is aggrieved from the impugned 10. transfer notification No. 8013-19/ Rationalization/ SST dated 8/12/2023 having no other alternate and efficacious remedy, approaches this Honorable Tribunal and filling the instant appeal on the following Grounds:

## **Grounds:**

- a. That the impugned transfer notification dated 08/12/2023 of respondent No. 2, is manifestly, illegal, Unlawful, and without any lawful justification, void-abinitio and ineffective upon the right of the appellant, hence untenable in the eye of law and liable to be cancelled.
- affected by Counsel b. That the appellant has not been treated in accordance with law, hence right of the appellant has secured and guaranteed under the law, are badly violated.
  - c. That the impugned order notification is illegal, under lawful and facts of political motivated, mode being personalized with appellant and nothing else.
  - d. That the appellant has been transferred to the school i-e GHS nawakaly whereas the SST general sanctioned post is not existed. And the appellant apprehends that his salary may cease either today or tomorrow, resulting in serve mental retardation and hardship to the appellant.

(Copy of Payroll Slip is attached as Annexure "F").

- e. That the appellant have been transferred based on rationalization policy from GCMHS Dagger, No.1 to GHSS nawaklay is illegal, unlawful and against the law and ineffective upon the right of the appellant.
- f. That the appellant is being treated unequally against the law and he is being deprived of equal protection of law.
- g. That through the impugned order/ notification dated 8/12/2023 the respondents have violated the fundamental rights of the appellant as guaranteed by the constitution of Pakistan.
- h. That the appellant seeks leave of the Honorable tribunal to raise additional points, during the course of arguments with the kind permission of this Honorable Tribunal.
- Prayer:

For the aforesaid reason, it is therefore most humbly prayed that on the acceptance of this petition the impugned notification No. 8013-19/ Rationalization/ SST dated 8/12/2023 may kindly be declare as unlawful, illegal, without any lawful justification, viod-ab-initio as well as against the rationalization Policy and also in ineffective upon the right of the appellant.

Any other relief which this Honorable tribunal deems proper in the circumstance of the appeal may also be granted in favour of appellant.

Appellant

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Advocate

Waqas Ali Shah Advocate High Court

#### **CERTIFICATE**

Artested by Coursel.

> Certified that the contents of the appeal are correct and true to the best of my knowledge and no other appeal have been filed by the appellant before this appeal in this August Tribunal.

# Before the Honorable Provincial Service Tribunal Khyber Pakhtunkhwa

(6)

Wajid Ali Shah S/O Said Hukam Shah (SST) General (BPS- 16) Presently posted at GHSS Naway Kalay Buner

### Versus

. ... ...

... Appéllant

... ... Respondents

- 1. The Director (E&SE) Education Department Khyber Pakhtunkhwa Peshawar
- 2. The District Education Officer Male District Buner

### <u>ÁFFIDAVIT</u>

I, Wajid Ali Shah S/O Said Hukam Shah (SST) General (BPS-16)

Presently posted at GHSS Naway Kalay Buner do hereby affirm and declare that the contents of this **appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this honorable Tribunal and no other appeal by the appellant has been submitted before this Honorable Tribunal.

thes feel "

Deponent

Wajid Ali Shah S/O Said Hukam Shah

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ONNEXUSE .. A.,



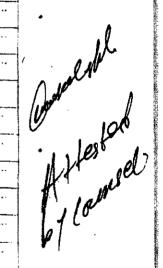
GOVERNMENT OF KHYBER PAKHTUNKHWA OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) DISTRICT BUNER PHONE & FAX NO. 0939-555110 EMAIL: edobuner@gmail.com



#### NOTIFICATION

In pursuance to the Secretary Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar, Reforms and Implementation Wing letter No.SO(Reforms)R&1/1-24/General/2023 dated Peshawar, the 8° November, 2023, the Competent Authority is pleased to rationalize and post the following SST(G) at the schools mentioned against their names in their own pay and scale as per "Rationalization Policy" issued by the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa vide No. 4499-4501 dated 27/10/2015 in the interest of public service with immediate effect.

S.No	Name and Designation	Present School	School Where Posted	Remarks
			<u> </u>	Rationalized
2	Baligh Ur Rahman SST (G)	Cliffe D.		as per STR
		GHSS Batara	GHS Batai	do
r	Abdur Rahman SST (G)	GHSS Batara	GHSS Bagh	do
4	Abdul Wadood SST (G)	GHSS Chanar	GHSS Bagh	do
5	Nazir Muhammad SST (G)	GHSS Chanar	GHS Katkala	úp
6 Hermeet Singh SST (G)		GHSS Ghurghushtu	GMS Gujar Abad	da
7	Noor UI Nabi SST (G)	GHSS Jangai		
			GHSS Charomi	do
	Rashid Sultan SST (G)	GHSS Jangai	GIIS Malka	do
, 1	Farhad Ali SST (G)	GHSS Khanano Dherai	GIIS Chanal	· ·
10	Arif Zaman SST (G)	GHSS Khanano Dherai	GHS Jaba Amazi	do
11	Hayat Gul SST (G)	GHSS Kulyari	GHS Naway Kallay	·do
12	Saced Ullah Khan SST (G)	GHSS Nagrai	GHS Khararai	·
13	Muhammad Alam SST (G)	<u>Children</u>		• • UQ, •••
		GHSS Nawagai	GHS Langaw	do
14	Momin Khan SST (G)	GHSS Totalai	GMS Damnuir	
13	Muhammad Ahmad SST(G)	GHSS Topai	GHS Alami Banda	do
16	Wajid Ali Shah SST (G)	GCMIIS Daggar No.1	GIIS Naway Kalay	<b>du</b>
17	Mudasar Rahman SST (G)	GHS Kawga	GHS Mandaw	do
18	Fazli Rabbi SST (G)			**************
		GHS Maina Kadal	GHS Jaba Chowau	do
19	Fazal Hadi SST (G)	GHS Maina Kadal	GHS Kangalai	·
20	Ihsan Ur Rahman SST (G)	GHS Mirzakay	GMS Dargatai	do
	Bakht Zaman Khan SST (G)	GHS Nawagái	GMS Qudratullah Garhi	····· do
2	Fazli Subhan SST (G)	GHS Nawagai	GHS Suuvai	
3	Bakht Rasool Khan SST (G)	C110 0 1		
		GHS Pander	GHS Kalan	do
				L



24 -	Akbar Ali SST (G)	GHS Pander	GHS Jamra	do
25	Amin Ur Rahman SST (Q)	GHS Shalbandi	GHS Swawai	cb
K 26	Shaukat Ali SST (G)	GHS Shalbandi	GHS Swawal	do
27	Sheraz Khan SST (G)	GHS Shalbandi	GHS Mangal Thana	do
27 44 28	Sher Bahadar SST (G)	GHS Sura	GHS Karigalai	do
29	Farid Ahmad SST (G)	GHS Swari	GHS Asharay	do
30	Javid Ali SST (G)	GHS Swari	GHS Jamra	do
31	Shahab Ullah SST (G)	GHS Tangora	GMS Kas (Chagharzi)	

Note:-

- I. No TA/DA is allowed.
- 2. Charge report should be submitted to all concerned within three days.

#### (IFTIKHAR UL GHANI) DISTRICT EDUCATION OFFICER MALE BUNER. •

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# Endstr:No. 8013-19 /Rationalization/SST/, Dated: 08/12/2023

Copy forward for information to the:-

- 1. Director E&SE Khyber Pakhtunkhwa Peshawar.
- 2. Deputy District Education Officer (M) Buner.
- 3. District Monitoring Officer EMA, Buner.

4. DAO Buner.

5. Principals /Head Masters Concerned, with the direction to submit compliance report within a week positively.

1

6. Teachers Concerned.

7. Master File.

DISTRICT MALE BUNER.

Rationalization of CT Posts @ 1.5 CT per Section in Middle/High/Higher Secondary Schools (Male). There will be a section on 40 students, on 21 (p-9) more students another section be allowed.

Schoo	Name of	Example	T	Sancti	oned Posts after Rationalization
,l Code	Middle/High School	Lf Total Enrolment	Class	No of Section	ĊŢ
		1-60	6*	2	Minimum 2 CT per school afterward 1.5 CT per
30056	GMS A	1-80	7	2	section, There will be a section on 40 students, on 61 students another section be allowed ,similarly on
		1-120	8*	3	101 students 3" section will be allowed and so on.
ļ	~~~	1-60	64	1	Minimum 3 CT per school afterward 1.5 CT per
1		1-80	7	2	section. There will be a section on 40 students, on 61 students another section be allowed, similarly on
25277	GHS B	1-120	8*	3	tor students 3" section will be allowed and so on.
		1-60	9th	1	Minimum 4 SST per school (one Bio Chem) +one Math, Phy) and 2 SST Gen) afterward 1.5 SST per
		1-80		2	Section. There will be a section on 40 students, on 61 students another section be allowed, sunilarly on 101 students 3 <sup>rd</sup> section will be allowed and so on.

Posting of Teachers on rationalization.

I am further directed to further clarify that:

Affested by Counsel.

- 1. On rationalization surplus teachers in Primary Schools, PST B-12, Senior PST B-14, may be posted in the nearest school if possible then in the same UCs and then in the same circle and then in the same Sub Division and then in the same District Subject to the provisions of need,
- 2. Over all ratio of SPST/PST will remain according the sanction posts.
- 3. Senior most PSHT B-15, SPST B-14 & PST B-12 (According to the Seniority list) may be retained in the same school of their present posting and junior most may be transferred to other needy schools.
- 4. No teacher of CT B-16, PET B-16, AT B-16, DM B-16, TT-16, will be posted in Middle Schools.
- 5. Senior most Senior CT and SST (According to the Seniority list) may be retained in the schools of their present posting and junior most may be transferred to other schools.
- 6. Disable teacher may be retained in the schools of their present posting; another teacher may be shifted instead of disable.

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·····	1	·	5	1	Γ			Gublect(a) in	1	Data of ist:	Di. anAnatt	Data of	1			
.No	CNIC No	Nama	Father Name	# Domicile	Date of Birth	Qualificat ion	Prof Qualiti	Master With Division	Yest of 8.5d	Apptt:In	Promation	Regular: Notification	Nierit . Scora	Advertisment No & Date INF(PM3B3	Method of Recruitment Regularized	School/Office
050		SALAH UDDIN		Ðuner	01/01/1987	M Sc	M Ed	Chernisity	2013	20/11/2015	30.11 2015	29/03/2018	119.28	Dated 10/12/2014	infough Act 2016	GHS KATKALA
051		SYED AHMAD KHAN		Bunar	15/12/1985	M.Sc	M,Ed	Chemistry	2012	30/11/2015	30.11 2015	29/03/2018	115.19	INF(P)4383 Dated 19/12/2014	Regularized through Act 2016	GHS Almai Banda
052		WASEEN KHAN		Abboilabac	13/03/1982	M.Sc	8,Ed	Chemistry	2011	30/11/2015	30.11.2015	22/03/2018	1 19,14	INF(P)4393 Dated 10/12/2014	Regularized through Act 2015	GH5S NAWAN SHEH
053		inayat Ur Rehman		Chiral	03/04/1987	M.Sc	8.Ed	Mathamatics	2811	30/11/2015	30.11.2015	22/03/2018	1 19.00	INF(P)4383 Obied 10/12/2014	Regularized Uhrough Act 2018	GCMHS Boys Chitral Lower
054		Snatooq Ahmad		Chitral	11/01/1988	M,Sc	B,Ed	Mathomatics	2013	30/11/2015	30.11.2015	22/03/2018	1 19,00	INF(P)4383 Dated 10/12/2014	Regularized Ibrough Act 2018	GHS Bumburat
055		Zia Ur Rehman		Chitrai	15/04/1989	M.Sc	8.Ed	Zaclogy	2016	30/11/2015	30,11,2015	22/03/2018	1 18.97	(NF(P)4383 Daled 10/12/2914	Regularized Ihrough Act 2016	GHS Bang
D\$6		lhsan Ullah		Dir Lower	09/11/1984	MA	8.Ed	English	2011	30/11/2015	30.11,2015	22/03/2018	1 18.91	INF(P)4383 Dates 10/12/2014	Regularized through Act 2018	GH5 Dapoer
057		(meus		Buner	04/01/1999	6.Sc	8.Ed		2014	30/11/2015	30.11.2015	29/03/2018	118,91	INF(P)4383 Oatod 10/12/2014	Regularized through Act 2018	GHS onazi khanao
16B	t 3202-5318301-1	ZAHIR ULLAH	Mutsaannad Niqab	Batlagram	10/02/1987	M.Phil	B.Ed	Pol. Science	2013	30/11/2015	30.11.2016	29/03/2018	118,80	10/12/2014	Regularized through Act 2018	SDEO (M) Batlagram
059		Khalid Mehmond		Tank	15/05/1968	M.St.	8.Ed	Zociagy	2011	30/1 1/2015	30.11 2015	15/03/2016	118,53	INF(PH383 Dated 18/12/2014	Regularized Unrough Act 2018	GHS Kot Khadak Tan
060		Muhammad lahfaq		Dir Upper	01/04/1990	M.Sc	8.6.1	Mithematics	2013	16/06/2015	16.06.2015	16/03/2016	118.43	1 NP/4393/10-12- 2014 INF(P)4383	Regularized Uhrough Act 2018 Regularized	GHSS Sawni
061	13202-8761709-1	MUHAMMAD NAWAZ KHAN	Qamar Zaman KHan	Ranagram	02/01/1978 	M.Sc	B.Ed	Agriculture	2014	22/02/2013	30.11.2015	29/03/2018	118,4C	Datod 10/12/2014 INF(P)4383	Regularized Urrough Act 2018 Regularized	GHS ASHARBEEN
062		Ibrar Ahmad		Bucer	01/01/1958	M,Phil	8 Ed	Chemistry	2011	30/11/2015	30 11.2015	29/03/2018	118,39	Dated 10/12/2014	Negularizeu Verougn Act 2018 Regularized	GHS pander
283		FAZAL E RABI		Nowshara	04/01/3985	M.Sc	M.Ed	Economica, Islamiyat	2012	30/11/2015	30.11 2015	29:03:2018	118.35	Dated	through Act 2018 Regularized	GHSS MOHIB BANDA
<b>3</b> 4		Khaliq Daul		Buner	04/13/1958	M Sc	8,E1	Zoology	2014	04/09/2015	04.09.2015	29/03/2018	1 18.20	Dalad	through Act 2018 Regutarized	GHSS dzkadda
55	13101-1028717-3	MUKHTAR AHMED Awan	ZARDAD KHAN	Abbottabad	21/02/1990	M.Sc	M Ed	Miczob/atagy	2014	30/13/2015	30,11,2015	22/03/2018	138,20	Dated 16/12/2014 INF(P)4382	through Act 2018 Regularized	GHS BODLA
66	13302-0287738-9	Muhammad Nasem	Muhammad Saleem	Haripur			BEd	Computer Science	2013	30/11/2015	30.11 2015	22/03/2016	118,78	Onted 10/12/2014	through Act 2015 Regulatized	GHS Mectulan Da Ma
57		Muhammtd Jaffar		Shangla		M.Sc chemistry	BEd		2013	30/11/2015	30 11,2015	16/03/2076	T 18.74	Caled 10/12/2014	Ihrough Act 2018 Regularized	GHS opai shangia
GB		ichfaqe Eialls		Chitra)	12/01/1980	M,SC	B,Ed	Economics	2014	30/11/2015	30.11.2015	22/03/201B	\$18.00	Dated 10/12/2014	through Act 2018 Regularized	GHS Drosh
69	<u></u>	Zalar Kasa		Dir Upper	61/02/1982	M. Sc	B.Fc		2015	13/03/2015	13.03 20 <sup>3</sup> 3	13/04/2018		Dated 10/12/2014 INF (2/14263	through Act 2016 Regularized	GHS Bandel (P)
32		June 9 Armad		Mansetra	30/03/1580	M: Sc	NI Ed	200037	жıз	20/11/2015	30 11 2013	29/03/2018	**7,67	1746d 19713/2014	through Act 2018 Regularized	GHS Storklad
¥1		Na <sup>y</sup> d Krim		Buner	02/02/1986	M.S <del>.</del>	a Ec	čatany 	301%	30/11/2015	30 11.2510	25/01/2018		Conteid 10/12/2014	through Act 2018 Requisitions	GHS khẩợci
32	13101-8030036 3	Munamman Fatt Yogant	Siehammad Gesel Krisel	erost duce	260104143	₹#\$\$	* #3	is amya' i	צימי	20/11/2018	30 11 201A	22/03/2019	137 81	Outed	ttivougn Azt 2018	5185 Estajkan Harhrur

#### FINAL SENIORITY LIST OF (2024) SST (G), SST (B/C), SST (P/M) & SST (TECH & COMMERCE) OF ELEMENTARY AND SECONDARY EDUCATION KHYBER

Page 284 of 517

		1	1			Qualificat	Bead	Subject(s) In	Year of	Date of lat:		Date of	Morft	Advortiament	Method of	•
No	CNIC No	Name	Father Name		Date of Sirth	ion	Gualif:	Master With Division	9.Ed	Apptt:in Edu Depti;		Regular: Natification	Score	No & Date P/D0//2656(13	Recruitment Regularized	School/Office
114		Muhammad Nəzir		Lakk Alarwal	11/94/1982	MA	B.Ed	English	2014	30/04/2014	30.04.2014	29/03/2016	135.SD	Dated 05:01/2014	through Act 2018	GHS Tari Khail Laki
175	14301-3404055-9	Muhammad Azim	Fezzi Anad	Kobat	03/01/1986	ма	M.Ed	Urdu,Engksh	2013	81/02/2012	91,02,2012	18/03/2018	135,50	P/D(1)/2666/13 Dated 05/01/2014	Regularized Unrougin Act 2018	GHS Talan; Jødend
18		Muneer Ahmad		Mansehra	12/04/1985	ма	9.Ed	(slamiyət	2013	30/04/2014	30.04.2014	29/03/2018	135,49	P/D(1)/2655/13 Cated 05/01/2514	Regularized Uwough Act 2018	GHS bheenja
117		Asynar Khen		Oir Lowar	01/09/1990	MA	B.Ed	English	2013	38/04/2014	30.04.2014	22/03/2018	135.47	P/D(I)/2656/13 Dated 05/01/2014 P/D(I)/2656/13	Regularized Inrough Act 2018	GMS Muri(al
18		KHALID SHAH		Swata	20/04/1967	ма	M.Ed	Pal.Scienco,	2011	30/04/2014	30.04.2014	16/03/2018	135.45	Dated 05/01/2014	Regularized Urraugh Act 2018	GHS KOTARPAN
119		Natioam Akhlar		Swabi	26/03/1988	ма	M,Ed	English, Islamiyat	2813	30/04/2014	30,04,2014	16/03/2018	136,31	P/D(1)/2666/13 Dated 65/01/2014	Regularized Prough Act 2016	GHS Ghutama Swa
120		Rehmet Lilleh		Karek	15/02/1979	MA	Ð.Ed M. nd	English, Pal.Science, History	2010	30/04/2014	30,84,2014	16/03/2018	135,28	P/D(1)/2586/13 Dated 05/01/2014	Regularizad Uhrough Act 2018	GHS Karak
121		Shahi Room Khan		Mardan	18/04/1985	MA	rn Ed	istamyat	2012	22/01/2010	22.01.2010	16/03/2018	135,20	P/D(I)/2666/13 Delad 05/01/2014	Regularized Itsmugh Azt 2018	GHSS Gaddar Man
27		Wajio Ali Shah		8uner	03/01/3987	MA	M.Ed	English, tslamlyat	2013	30/4/2014	30.4.2014	29/03/2018	135.20	P/C(1)/2566/13 Dated 05/01/2014	Regularized trisough Act 2018	GCMHS Daggar
23		ljoz klailoob Khan		Shangta	02/01/1986	B.S	8.Ed	Zoningy	2013	30/04/2014	30.04 2014	16/03/2018	135.19	P/D(I)/2666/13 Dated 05/01/2014 P/D(I)/2668/13	Regularized through Act 2018	GHS guìlbut
24		Mahammod Tasleom		Peshewar	09/01/1953	ма	8 Ed	English	2010	36/04/2014	30.04.2014	16/03/2018	135.18	Dated 05/01/2014	Regularizad through Act 2014	GHSS shekhan poshawar
75		FAZAL RAHMAN		Burei	03/01/1977	MĄ	M Ec	History, Pol.Science, Pek study	2018	81/07/2008	01,07,2006	16/03/2818	135.14	P/D(I)/2665/13 Dated 05/01/2014	Regularized through Act 2018	GMS KOT GOKAN
126		israr Khan		Dr Upper	01/01/1988	ма	8 Ed	۶	2013	30/04+2014	30.04,2014	30/05/2018	135.13	P/D(1)/2856/13 Dated 05/01/2014	Regularized Unrough Act 2018	GMS Bonkel
27	-	Asad Ali Khan		Karak	11/05/1984	MA	8.Ed	Pak sources	2013	30/04/2014	30.04,2014	16/03/2018	135,09	P/D(1)/2686/13 Dated 05/01/2014	Regularized through Act 2018	GHS Bland Edal K
28		UMAR WALL		Bunor	10/05/1968	ма	M Eø	Engkah	2013	30/04/2014	30,04.2014	29/83/2918	135.05	P/D(1)/2666/13 Dated 05/01/2014	Regularized through Act 2016	GHSS TORWARS
29		Taxveer Khan		Kohai	05/12/1956	NA	9. <b>6</b> 4		2011	39/04/2014	X C4.2014	16/03/2016	135,01	P/D()/2656/13 Dated 05/01/2014	Regularized through Act 2018	GHS Khadizai Koh
30		HAFIZ IRFAN ALJ SHAH		Nowshora	10/01/1958	м.8с	8 Ed	Eawnonanntal Sciense	2013	33/04/2014	30 04.2014	29/03/2018	134.92	P/D(1)/2596/13 Daled 05/01/2014	Regularized through Act 2018	GHS MANAHI
31		Masced Usman		Chival	22/12/1967	M Sc	à Ed	Zoology	2012	30/04/2014	30.04.2014	22/03/2010	134,92	P/D(()/2666/13 Dated 05/01/2014	Regularized through Act 2015	GHSS Ayun
32		JUNAID KHAN		Nowsherá	01/04/1986	M.Sć	8 Cn	Charastry	2013	30/04/2014	30.04,2014	29/03/2018	134.82	P/D(1)/2666/13 Dated 05/01/2014	Regu anzed through Act 2015	GHS JABBA KHUS
33) •		Arsnan Khan		#rshawar	386110 M20	M4	ម ទ៩	Beglisti	2013	36/4797774	30 4 2014	\$##0\$/20*B	134.81	P/D(1)/2666/13 Dated 05/01/2014 P/D(1)/2666/13	Regularized through Act 2016	GHS Sherkers
34		TITAJ CANTANIJA		0.1 Khan	15 De#1926	ма	9 Es	Englad	2010	3640+701+	<b>39.0</b> 4.2014	2210322-14		Dated 85/01/2014	Regularsted Wrough Art 2018	GHS COMAL KALA
25		sateli ahmag Shang		Newstre*#	21 10/1979	₩A	12 Ed	English	2011	394(4Q3-4	39.04.0777	28:93:2030		P/D(I)/2666/13 Dated 95/01/2014	Regularized througy Art 2018	GHS ADAMZAL
16	14503-4739685-7	Deesnor Ali	Abcu GhaPar Khan	1*85.62* <i>3</i>	05/01/1993	ма	€r	deorem as	2013	3000402014	so na 2 ma	99 <b>/33 ∡</b> €18		PXC419/2660 13 Clafeu 6590 ( 2014	Fice Panzeri Invel gh Act 2015	CHGS Trapp mane

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i.No	CNIC Na	Nerna	Father Name	Domicite	Date of Birth	Qualificat Ion	Prof Quelif;	Master With Division	Year of E.Ed	Oate of ist: Apptt:in Edu Deptt;	se i pocaciaci	Regular: Notification	Morti Scare	Advertisment No & Date	Method of Rocruitment	School/Office
393		Sherin Zada		Benar	12/10/1969	ма	8.E4	Pashio	1999	13/11/1994	28.10.2014 <sub>.</sub>				By Franction	GMS kozkali
394		Muhanonad Shalqat		Mansohra	05/01/1070	MA	9.Es	islamyat	1998	13/11/1994	28,10,2014				By Promotion	GHS shinkian mana
395		Sardar Shah		Buser	15/05/1965	MA	8.Ed	Political Science	1998	\$4/11/1994	28.18.2014				By Promoton	GCMHS Daggar
196		Nizam Vd Oln		Tanix	12/07/1965	MA	0.Cd	Arabic	2011	14/11/1894	28.10.2014				By Promotion	GMS lakki machan
97		Nijat Ali	Farzand Al:	Swat ·	15/07/1959	ма	M.Ed	Pashto, Islamyot	1597	14/11/1994	28.10.2014				By Prance on	GHS Ghalegay Sw
185 .		MUHAAMAD SABIR		Abbottabad	03/02/1973	ма	8.Ed		2065	14/11/1994	28.10.2014				By Promotion	GAH/S KANTHIALI ABBOTTABAD
99		Muhammed Suliman		Malakand	01/02/1971	ма	B.Ed	Peshio	2005	15/11/1994	28.10,2014				By Pramotion	GHS Iplakan
90		Sheh Rawan	Shah Jehen	Malakand	15/03/1966	МА	9.Eđ	Pashto, Ecnomics	2001	16/11/1994	28_10.2014		,		Sy Promation	GHS No/2 Thans Malekand
01	15401-0719537-5	Ghulam Hassen	Hazrei Hassen	Malakand	05/02/1972	ма	8.Ed	Pashto, Economics	2004	16/11/1994	28.10.2014				By Promotion	GSFAHSS Ghani (
92	17301-1659166-1	KIRAMAT ULLAH	Abdul Labi	Peshawar	20/10/1973	MA	M.Ea	LLB, LLN, English, Islamic Sharya Iaw	2009	16/11/1994	28.10,2014				By Pramation	GHES NO/I CITY
33	17301-1437012-7	NISAR KHAN	Bahader Khas	Peshawer	1 6/03/1989	ма	M.Ed	Urdu	1997	17/11/1994	28.10.2014				By Promotion	GHS BASHIRABA
ы	14301+1936052-7	Muhammad Seldar	Muhammad iqbal Khan	Kahsi	22/05/1970		0.Ed.M. ed	Urdu. Pak Sludy,Ecnomics	2000	17/11/1994	28,18.2014				By Promotion	GHS Jenna Kohat
05		NAZIR AHMAD		0.1 Khan	03/12/1971	ма	8.Ed	isamyat	1998	17/11/1994	28.10.2014				By Promotion	GHS ND/2 KULACI
a6		thu:anuflab	Sand Ali Khan;	Karak	14/03/1969	MA	N,Ed	Pak Słudy	2612	19/11/1994	28.10.2014				8y Promoilon '	GHS Ahmati Band Karak
07	17201-7723264-3	Zulfigar Al	Zəfar Ali	Nowshera	15/09/1969	M Sc	B,Ed	Pak Study	159 <u>/</u>	19/11/1994	28/10/2014				By Promotion	GHS Wazır Ghari Novenera
юв		Ghulam Muhammad	Ghulam Gadir Khan	Karak	12/01/1970	MA	6 Ed	•	1997	19/11/1994	28,18 20 14		·		By Promotion	GHS Surdag Karak
109		Faildullah Gul	Das Khan	Kohat	06:05/1972	ма	B.Ed	Pashio	i999	15-11/2994	28.10 2014				By Prometice	GHS Manzimi, Karal
10	4	Azz Ur Rehman		Karak	08/08/1959	MA	BE9	Urdu	2000	21/11/1994	28.10.2014				By Promotion	GHSS chande khom
11		Suisammed Ani		Nowshera	22/04/1968	MA	8.E¢	Jrđu	1996)	22/11/1994	28.10.2014				By Promision	GHS sarband
12		Salster Ak		Säet.	120270	M Sr	A Ec	Economits .	1597	23/11/1994	28.10.2014		]		By Promotion	GHS shah mansaor
·3.		Ançan an		Kurar .	2236.19 <b>7</b> 0	ца.	<b>∂ £</b> /a		:9 <u>9</u> 7	2911/1394	28.10 2010				By Proposition	gsjam99
		Syec Ratimat Ak Sisari		Ugrçar (	110J/1906	M.Sc E	3 Ec	>ysica	1297	C6/11/1994	28.10 2014				By Proaction	G=45 Junga Lund Kr
:5		电压计磁电 如此外后		and street in the	5:00/1976 /		v.5¢		2005	2อก นาษระ	28 10.2014		ĺ		By Providice	GMGHS PATTAN

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8.Na	CNIC No	Name	Fether Name	Comisile	Date of Birth	Qualificat Iun	Prof Guailt:	Subject(s) in Master With Olvision	Year of Q.Ed		Premation	Date of Regular: Notification	Merit Score	Adventisment No & Dote	Method of Recruitment	School/Office
958	16201-6580790-9	Manzoor Ali	Guisher Khan	Swabi	18/04/1966	ма	8.Ed.	Pashto			28.10.2014				By Promotion	GMS Landi Dea SWT
957	16101-1125838-1	Sufaid Khen	Shamshir Khen	Mardan	01/05/1969	ма	ð.Eđ	Pashio	1998	25/02/1958	28,10,2014				by Promotion	GHS Kandar Marson
958		Muhammad iqbal		Dir Upper	06/01/1968	ма	8.Eø	lelemyat	1997	05/03/1988	28,10,2014				By Promotion	GHSS kaikol
955	1	Jamil Ur Rahman		8un#	05/05/1954	ма	B.Ed	Pak Study	2010	10/03/1988	28,10.2014				8y Promotion	GHS pandir
960		Muhammad zadə		Dir Upper	03/08/1969	MA	8,Ed	English	1998	13/03/1988	28 10.2014	•			By Promotion	GHS kair dara
961		SARDAR HUSSAIN		Mardan	01/04/1968	MA	8.Ed		2015	04/04/1988	28,10,2014				By Promotion	GHS BABOZAI KATLANG
962		Abdur Rasind		8un.ter	05/05/1964	мл	B.Ed	Pashto	1995	13/04/1988	28,10,2014				By Promotion	GCMHS Daggar
963	13504-2244757-9	Rahim Ullah	linded UD din	Torghar ·	15/03/1970	MA	M.ED	Islamiyat	2004	15/84/1986	26/10/2014			•	By Promotion	ASDEO Dour Mera Targhar
964		Jamal		MALAKAND	82/01/1965 /	MA	8.Ed	Pak Study	1996	26/04/1988	26.10.2014				By Promotion	GHS zalam kol 🤺
965		HIDAYAT UR REHMAN		Shangia	03/04/1973	MA	8. <b>£</b> ¢		1996	81/05/1988	28, 10, 2014				By Promadan	GCMHSS CHAWGA
966		Bakht Zaman Khori		Bunær	03/11/1967	MA	B.Ed	Undu	2005	27/07/1988	28.10.2014				By Promotion	GHSS angoi
967		Muhammad Nuzir		Mardan	04/09/1965	8A	8.Ed		1598	25/08/1988	26,10,2014	•			By Promotion	GHS Lund Khwarr Marclan
968	12201-0932326-7		Nuhammad Bakhsh	Tank	02/06/1965	ма	ØÉd	la smyat	1992	01/09/1968	28.10.2014				By Promotion	GHSSNCMHS No/1 Tank
969		Muhanunad Rokhan		Kohai	01/12/1970	ма	8 Ed	Pak Study, History	1997	12/09/1988	28.10.2014				By Promotion	GCHS Kohat
970		Khglid hugsasn		Marden	10/02/1 <del>9</del> 66	MA	8 E d	ปกรง	1996	15/09/1098	28 10,2014				By Promotion	GHSS Hath'an Marda
871		EHSAN ULLAH		D.E.Khan	15/10/1986	M.Sc	MEd	Economics,Pak Slady	1986	24(09)1968	28,10,2014		·		By Promotion	GHS NO IKULACHI
372		Noushad		Atardan	14/02/1965	MA	869	Pashio	2008	25/09/1988	28 10.2014				By Promotion	GHSS Peer Seddi Mardan.
973		langed Qxsh		Mardan	15/03/1985	MA	BEd	History, Pak Sludy	1996	25/09/1958	28 10,2014				By Promotion	GSSH2S Gujrat Mardi
174	-	filawat Khan		Swabl	15/02/1966	BA	B.Ed		28:6-3	25/09/1968	28.10,2014				By Promotion	GHS Yacabi Swabi
75	ن <u>ا</u>	Vinir 1/1 Mulik		Mardan	10/03/1966	BA	BE¢		2¢10	25/041946	28 16 2014				By Promotion	GHSS Mardan
i≩s_	, the second sec	'idayat UBan		Mancasi	29/03/1969	MA	FI £4. I	Ppster:	ži če	25495/198B	20 18.2014					GMS Chancharo Khat Merdan
77		laiet Kiven		Boner I	(5.1 H147),	un i	974 974	cashte	1957	25:09/1968	26 16,2014				Ву Рголісько	GHS marádu
n		ALLFAN MERMOOD		Shang a - G	15/03/1507	уд ,	viio -	Pannin;	2013	26.C.Pr1938	75,19,201a				By Projection	GHS OARA SERAI

#### FINAL SENIORITY LIST OF (2024) SST (G), SST (B/C), SST (P/M) & SST (TECH & COMMERCE) OF ELEMENTARY AND SECONDARY EDUCATION KHYBER

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مان قرمن (می الم می المعن (م)) معالی مال قرمی (می المی می ) المعن (م)) ( Annexuse . 19, 1 وموعد المل بغلاف تبادكم 1 Ble Up مور با من مرارس به کم محصر رست با لسب 2 مت 200/12 80 قر سر الم الم من عمار م سكول من عمد الرسيد (SST(4) او سردار شاء (SST(4) دو لون ی مرد س جور می مرد می میر می ی جراب ان دونوں کی SST کروٹوشن کا ریخ التو بر ۲۰۰ میں قد ایک جر کروٹر من بیلے تعریز سندہ حلاز کو کس طرح جو شیر فرار دیا جاتا ہے۔ اس بار بے میں سیار تی کمین این میں مرالی میں افزر برامیس بے لیردو کر دو ای طرف مجاری سکول میں با بیخ SST جزل دو SST با شو کرد ی اور این SST میں فرنس تھا، محارا الک SST حاب سوامن صاب مستقل الور نیر فرانسم نے زمر میں میں آتے تھے، کیونکہ ایسsstig ٹو چھے پیلے ہی من بحشیر - اس کر ملاوہ میاد سے سکول سے من الرجان (۵) SST (۵) سرامین (۵) SST ، ال پر خان (۵) SST (۵) ار ماحران (۱۱۶) SST المرد فرس من مع من مروف والاسم. اس لے علد وہ مسرد موں کی تحقیقاں سمر میر میں کورس ایس مکل سے اسم مور الر فا سرود . ا ار جيئيوں کے تعد سلاد، امتحانات سونے اور تعريف سيش كا أنار ہو در آن بوری داخل می اعداد می سردر احام می مود . ان این این مام با تون تحو فتر منظر و تحق موجه امد ممار موجه اس اسل ار محد می ددان از از این مام با تون تحو فتر منظر و تحق موجه امد ممار مواس اسل ار می دردان از از از مام تر موجه میرد می در محاطا مات مسلوح کرا در کا صلح حماد در ما لر تو فررم، 22/21/11 a 

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Annexive ......



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GOVERNMENT OF KHYBER PAKHTUNKHWA OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) DISTRICT BUNER PHONE & FAX NO. 0939-555110 EMAIL: <u>edobuner@gmail.com</u>



#### CORRIGENDUM:

Consequent upon meeting of Appellate Committee held on 14-12-2023 in the office of DEO (M) Buner under the chairmanship of Dy; DEO (M), the following partial modifications are hereby made in this office rationalization order issued vide Endst: No. 8006-12/Rationalization/CTs Dated: 08-12-2023 in the interest of public service, with immediate effect.

S.No	Name and Designation	Present School	School Where Adjusted	Remarks
1	Mr. Amin Khan CT	GHSS Totalai	GHSS Ghurghushtu	Withdrawn at S.No. 30 (Retired)
2	Mr. Mobarak Ali CT	GHSS Totalai	GMS Totalai	Instead of Mr. Haider All at Serial No. 29
3	Mr. Dilaram Khan CT	GHS Nunser	GHS Kohay	Instead of Mr. Rahid Ahmad at Serial No. 59
1	Mr. Jamshaid Ali CT	GHS Nawagai	GHSS Nagrai	Instead of Mr. Khair Muhammad at Serial No. 61
5	Mr. Amad Akhtar CT	GHS Nawagai	GHS Swari	Instead of Mr. Akhtar Sher at Serial No. 62
6	Mr. Ashfaq CT	GHS Katkala	GHSS Gadezi	V.S.No.7
7	Mr. Said Wali Khan CT	GHSS Gadezi	GHS Katkala	V.S.No.6
8	Mr. Ihsanut Taj CT	GHS Inzar Maira	GHS Gumbat	Instead of Mr. Aziz Ul Haq at Serial No.46
9	Mr. Wajid Ali CT	GMS Bangeray	GHS Malka	At Serial No.52
10	Mr. Bakht Baidar CT	GMS Elum	GHS Kalakhela	At Serial No.70
11	Mr. Izhar Ul Hag CT	GHS Kawga	GHS Jaba Chowan	Withdrawn at Serial No. 51
12	Mr. Muhammad Ibrahim CT	GHS Kalil	GHS Ghazi Khanay	At Serial No.39
13	Mr. Muhammad Iqbal CT	GHS Ghazi Khanay	GHS Hiser	At Serial No. 38
14	Mr. Amal Dad CT	GHS Kalakhela	GHS Katkala	At Serial No. 34
15	Mr. Aycem Khan CT	GHS Mulka	GMS Wach Khwar	At Serial No.25
16	Mr. Iqbal Gul CT	GMS Chalandrai	GHS Dewans baba	At Serial No.75

(IFTIKHAR UL GHANI) DISTRICT EDUCATION OFFICER MALE BUNER.

Dated: 14/12/23 Endstt:No. <u>8147</u> دن. Copy forward for information to the:-

1. Director E&SE Khyber Pakhtunkhwa Peshawar.

- 2. District Monitoring Officer EMA, Buner.
- 3. Principals/Headmasters concerned.
- 4. DAO Buner.
- 5. Officials concerned.
- 6. Master File.

DISTRICT MALE BUNER.



GOVERNMENT OF KHYBER PAKHTUNKHWA OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) DISTRICT BUNER PHONE & FAX NO. 0939-555110 EMAIL: <u>edobuner@gmail.com</u>

(16)



#### **CORRIGENDUM:**

Consequent upon meeting of Appellate Committee held on 14-12-2023 in the office of DEO (M) Buner under the chairmanship of Dy; DEO (M), the following partial modifications are hereby made in this office rationalization order issued vide Endst: No. 8013-19/Rationalization/SST Dated: 08-12-2023 in the interest of public service, with immediate effect.

S.No	Name and Designation	Present School	School Where Adjusted	Remarks
1	Mr. Rashid Sultan SST (G)	GHSS Khanano Dherai	GHS Chanal	Instead of Mr. Farhad Ali at serial No.9
2	Mr. Sami Ullah Khan SST (G)	GHSS Batara	GHSS Bagh	Instead of Mr. Abdur • Rahman at Serial No.3
3	Mr. Ali Umar SST (G)	GHSS Nagrai	GHSS Khararai	Instead of Mr. Saeed Ullah Khan at Serial No.12
d	Mr. Keran Raj SST (G)	GHS Kawga	GHS Mandow	Instead of Mr. Mudasser Rahman at Serial No.17
5	Mr. Bakht Rasool Khan	GHS Pandir	GHS Kalan	Withdrawn at S.No.23.
6	Mr. Javid All SST (G)	GHS Jamra	GMS Panghalay	At Scrial No.30
7	Mr. Hayat Gul SST (G)	GHSS Kulyari	GHSS Naway Kalay	Withdrawn at Serial No. 11
8	Mr. Ilisan Ur Rahman SST (G)	GMS Dargalai	GMS Karorai	At Serial No.20
9	Mr. Akbar Ali SST (G) GHS Jamra		GHSS Naway Kalay	At Serial No.24

Dated: 14/ 12123 Endstt:No. <u>8153-58</u>

Copy forward for information to the:-

- 1. Director E&SE Khyber Pakhtunkhwa Peshawar.
- 2. District Monitoring Officer EMA, Buner.
- 3. Principals/Headmasters concerned.
- 4. DAO Buner.
- 5. Officials concerned.
- 6. Master File.

(IFTIKHAR UL GHANI) DISTRICT EDUCATION OFFICER MALE BUNER.

DISTRICT BD ÓN OFFICÉR MALE BUNER.



GOVERNMENT OF KHYBER PAKHTUNKHWA OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) DISTRICT BUNER PHONE & FAX NO. 0939-555110 EMAIL: <u>cdobuner@ummil.com</u>

(17)



#### - CORRIGENDUM:

Consequent upon meeting of appellate committee held on 14-12-2023 in the office of DEO (M) Buner under the chairmanship of Dy; DEO (M), the following partial modifications are hereby made in this office rationalization order issued vide Endst: No. 8020-26/Rationalization/PET,DM,TT/. Dated: 08-12-2023 in the interest of public service, with immediate effect.

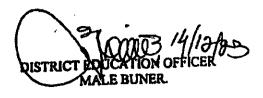
S.No	Name and Designation	Present School	School where adjusted	Remarks
1	Mr. Saleem Malik SPET	GHS Nawagai	GHS Chanal	Withdrawn at Serial No.5
2	Mr. Mustahab Gul SPET	GHS Sura	GHS Kalan	Withdrawn at Serial No.6
3	Mr. Majeed Gul SPET	GHSS Agaral	GHS Kalan	Withdrawn at Scriat No.3
4	Mr. Alam Gul SPET	GHS Bajkata	GHS KAIII	Instead of Mr. Shahid Rahman at Serial No.2
5	Mr. Bahrul Hakim STT	GHSS Agaral	GHS Kangalai	Instead of Mr. Iqbal Ahmad at Serial No. 23
6	Mr. Habib Uilah STT	GHSS Gagra	GHSS Naway Kalay	Withdrawn at Serial No. 25
7	Mr. Bahar Ali Shah SDM	GHS Sura	GHS Janak Banda	Withdrawn at Serial No. 16
8	Mr. Said Ghafoor Shah TT	GMS Dargalai	GMS Bhai Kalay	Adjusted against vacant post.
9	Mr. Kamal Zarin AT	GMS Hisar Baba	GMS Banda	Adjusted against vacant post.
10	Mr. Haji Muhammad DM	GHS Ghazi Khanay	GMS Elum	Instead of Tayyib Amin at Serial No. 18
11	Mr. Zahoor UI Haq DM	GHSS Ghazikot	GHSS Nawagai	At Serial No.21

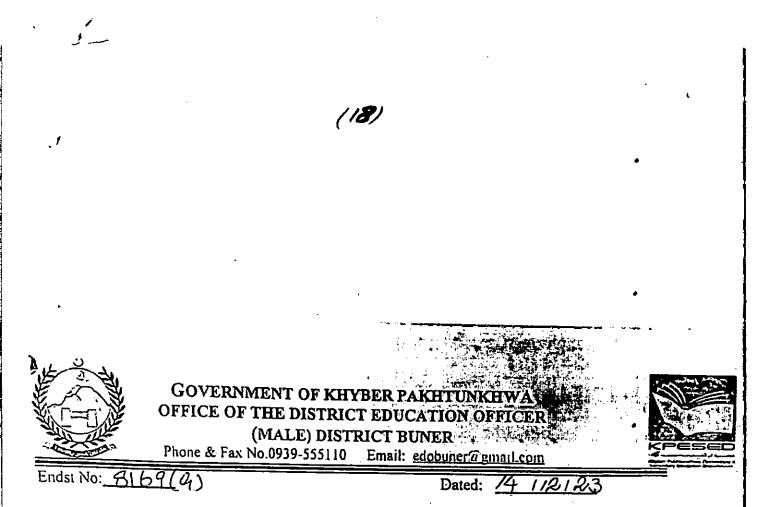
(IFTIKHAR UL GHANI) DISTRICT EDUCATION OFFICER MALE BUNER.

Dated: 14/18/2 Endstt:No. <u>8141-46</u>

Copy forward for information to the:-

- 1. Director E&SE Khyber Pakhtunkhwa Peshawar.
- 2. District Monitoring Officer EMA, Buner.
- 3. Principals/Headmasters concerned.
- 4. DAO Buner.
- 5. Officials concerned.
- 6, Master File.





#### CORRIGENDUM.

In partial modification of this office Rationalization orders issued vide Endst: No. \$013-19/ Rationalization/SST/ Dated: 08-12-2023, the schools mentioned in R/O the following officials may be read as given against each in the interest of public service.

S.No		School where posted	May be read as	Remarks
	Shaukat Ali SST (G)	GHS Swawai	GHSS Bagra	
12	Sher Bahadar SST (G)	GHS Kangalai	GHSS Khanano Dherai	

Note:

1. No TA/DA is allowed.

(IFTIKHAR UL GHANI) DISTRICT EDUCATION OFFICER MALE BUNER

Endst. Even No. and date.

Copy of the above is forwarded for information to the:

- 1. Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
- 2. District Monitoring Officer EMA, Buner.
- 3. District Accounts Officer Buner at Daggar.
- 4. EMIS Local Office.
- 5. Principal/Head Master Concerned.
- 6. Official Concerned.

DISTRIC MALE BUNER

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Affested by Coursel

Elementary and Secondary Education

Khýber Pakhtunkhwa

Subject: Appeal Against Unjust Transfer and Violation of Policy

Respected Madam,

Meekly stated that I am working as an SST in E&S education department, a dedicated teacher, writing to express my deep concerns regarding my recent transfer to another school based on the rationalization policy vide DEO(M) Buner order No. 8013-19/Rationalization /SST. Dated 08/12/2023. While I acknowledge the importance of policy adherence, I believe there are discrepancies in my case that need attention.

According to the policy for 9th and 10th base classes, there would be two SSTs general and one SST (Math/Phy) and one SST (Bio/Chem), and afterwards 1.5 teachers per section. Based on this criterion, for the base two sections we have teachers according to policy mentioned but for the remaining sections there is one surplus teacher and the junior-most should be transferred. However according to policy point No.5, it has not been specified whether SST General or SST Science should be transferred. It clearly says that the junior-most SST should be transferred, based on seniority list.

So According to seniority list there is another teacher appointed in 2015 who is junior to me (2014). On this criteria, I am not the junior-most.

Alternatively, if it has been determined by the date of appointment, then I am senior to two other teachers based on the date of appointment. Highlighting the ongoing seniority case against these teachers in Khyber Pakhtunkhwa Service Tribunal, questioning the decision-making process when a case determining seniority is under judicial review (Case Name is attached).

So, whether it has been done by the date of appointment or by seniority list, in both cases, I am not the junior-most.

Additionally, an SST (G) is working as an SST Math/Phy for the last 10 years, so he is not teaching a general subject but only physics, so I should be kept in his place. Furthermore SST to SS promotions are expected shortly. In our school, there are 4. SSTs expected to be promoted while one other SST G is going to retire in June 2024.

Committee Acceptance and Officer Rejection: Expressing concern about the

composition of an appeal committee, consisted of BPS 19 and BPS 20 officers and some:others, after the transfer order. Noting that the committee accepted my appeal, قُلُولُا لِنَاقَةُ وَاللَّهُ officer concerned rejected the decision and ordered my transfer.

6 6 6 Bott Appost Order: Wighlighting the subsequent order where same test

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• Rost-Appeal Order: Highlighting the subsequent order where some teachers were
 • returned to their old stations and others transferred to nearer stations.

Order Nos DEO(M) Buner: Corrigendum orders: SSTs: 8153-58 , PET,DM,TT: 8141-46 and CT: 8147-52 Dated: 14-12-2023.

Date Manipulation and Expedited Implementation: Additionally, I would like to bring to your attention that the officer concerned issued the rationalization order on Sunday, 10th December 2023, however he wrote the date as 8th December 2023 in an attempt to expedite the implementation of the order, which is against the law. This expedited implementation has led to inadequate planning and execution.

Our School, GCMHS DAGGAR being in the headquarter, is the hub for curricular and co-curricular activities where functions, meetings, and other extra work are ongoing all the time. We are in need of more staff.

In my defense, I would say that my first priority is to be focused on my teaching actively rather than sitting idle. My students, my staff members, and my principal are witnesses of my efficiency.

Even an SST(G), I reopened our science laboratory after years for the students of 9th and 10th and even for middle classes, which was before just a ghost house. I have been incharge of various literary competitions.

keeping these points in mind if you kindly retain me in my previous station so I can focus on my teaching and skill development. I would be grateful to you for the rest of my life.

I affirm my commitment to contributing positively to the educational system. A just resolution is crucial for personal well-being and the integrity of the educational institution. I appreciate your prompt attention and anticipate a fair resolution Thanks

Yours faithfully Wajid Ali Shah SST(G) GCMHS Daggar, Buner Dated:

Hested by Connel

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Refore The worthy director Elementry & Secontry Education perhans Up. subjection Application for disposed of departmented appeced for Immedicate disposed. Dear Six/Hadam. with due Respect of would doce fores thind attention to The above mentioned. Subject. That The condensign have submitted a dependmental appreced before This Honorable appediate forcom office against the order of District Education officer Burner. Affested by M is Therefore most humbly precyced that on the acceptance of that confliccution, The application of unlessigner Counsel. may thistly be accepted at prayad for. K Magiel Aliste, 5/0 daid Hellom Dated: - 22-02-2024. apselle) sst (q)

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# Before the Honorable Provincial Service Tribunal Khyber Pakhtunkhwa

Wajid Ali Shah S/O Said Hukam Shah (SST) General (BPS-16)

(23)

Presently posted at GHSS Naway Kalay Buner

#### Versus

... ... ... Respondents

- The Director (E&SE) Education Department
  Khyber Pakhtunkhwa Peshawar
- 2. The District Education Officer Male District Buner

Windight Affested by 150 might

APPLICATION FOR SUSPENSION OF THE OPERATION OF THE IMPUGNED ORDER/ NOTIFICATION NO.8013-19/ RATIONALIZATION/ SST DATED 8/12/2023 TILL THE FINAL DECISION OF THE INSTANT APPEAL.

#### **Respectfully Sheweth**

The applicants submits are under:-

- 1. That it is humbly submitted that the applicant /Appellant has filed appeal against order notification No. 8013-19 Rationalization SST dated 8/12/2023.
- 2. That impugned orders is liable to be suspended till decision of the main appeal on the following grounds

### Grounds

i. That appellant have got a good prima facie case on merit against the respondents and there is likelihood of acceptance of the Appeal. ii.

iii.

That if the operation of the impugned order/ notification No. 8013-19 Rationalization SST dated 8/12/2023 is not suspended it will cause irreparable loss to the appellant and resultantly the appeal will become infructuous.

That the instant application is to be considers the integral part of the appeal.

It is therefore, humbly prayed that on acceptance of this application, the operation of the impugned order/ notification No. 8013-19/ Rationalization/ SST dated 8/12/2023 may kindly be suspended, till the decision of the instant appeal.

Through:

Applicant/ Appellant

seel that

Waqas Ali Shah Adyocate High Court

#### <u>AFFIDAVIT</u>

Affested by Counsel.

I, Wajid Ali Shah S/O Said Hukam Shah do hereby confirmed that the contents of the instant application are true and correct to the best of my knowledge and belief and nothing has been kept concealed therein.

Deponent\_\_\_\_

Wajid Ali Shah S/O Said Hukam Shah

لعرال in J'an ho مورخه و ميدي شا بنام عرار توا مقدم دعوكى *7.* باعث تحريرا نكه مقدمه مندرجه عنوان بالامين ايخ طرف سے داسطے بيردي دجواب دہي دکل کاردائي متعلقه النامقام مسين من ملع جوارعلى بناء بريد مد مقرد کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاردائی کا کامل اختیار ہوگا۔ نیز وسل صاحب کوراضی نامه کرنے وتقرر ثالت ہ فیصلہ برحلف دیتے جواب دہی اورا قبال دعو کا ادر بسورت ذكرى كرف اجراءا درصولى جيك دروبد يارعرضى دعوى ادردرخواست برتتم كى تفرريق زرایس پردستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیردی یا ذکری بیطرفہ یا بیل کی برایدگی ادر منسوض نیز دائز کرنے اپیل نکرانی دنظر ثانی دبیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل باجزوی کاروائی کے داسط اوروکیل بامختار قانونی کواپنے ہمراہ بااپنے بچائے تقرر کا اختیار موكا اورمها حب مقرر شده كوتهى وأي جمله فدكوره بااختيا رابت حاصل مول محما دراس كاساخته مرداختة منظور تبول موگار دوران مقدمه بی جوخرچه د مرجاندالتواسيخ مقدمه کے سبب سے د ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہویا حدے باہر ہوتو دکیل صاحب پابند ہوں گے۔ کہ بیروی مركوركري بالبدادكالت فامدكهديا كمستدرب المرتوم ÷20 واه العب سے لئے منظور ہے۔ بمقام