


FORM OF ORDER SHEET

Court of _____

Appeal No. 1829 /2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	08/10/2024	<p>The appeal of Mr. Tufail Shakeel resubmitted today by Mr. Haibet Khan Advocate. It is fixed for preliminary hearing before touring Single Bench at A. Abad on 30.10.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman  REGISTRAR</p>

The appeal of Mr Tufail Shakeel received today by registered post on 19.09.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Annexures A, B, C & D of the appeal are illegible.
- 2- Annexures of the appeal are not in sequence.
- 3- Appeal has not been flagged/marked with annexures marks.

No. 813 /Inst./2024/KPST,

Dt. 29/9 /2024.

Amirulhas
ADDITIONAL REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Haibat Khan Adv.
High Court at A.Abad.

Respected Sir,

A

*objection removed as desired
by the office. My service appeal
received to the undersigned on
27.9.2024. File being re-submitted.
on 3.10.24*

Haibat Khan
3.10/2024
Advocate High Court

BEFORE THE CHAIRMAN SERVICE TRIBUNAL KHYBER
PAKHTUNKHUWA, PESHAWAR

Service Appeal No. 1829 /2024

Tufail Shakeel SST (Bio/Chem), Govt. High School Samundar Katha, Abbottabad.

...APPELLANT

VERSUS

Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar & another.

....RESPONDENTS

SERVICE APPEAL

INDEX

S.#	Description	Page No.	Annexure
1.	Service Appeal alongwith affidavit	1 to 7	
2.	Copy of appointment posting order	8 to 11	"A"
3.	Copy of notification	12 to 17	"B"
4.	Copy of both the orders	18 to 21	"C" & "D"
5.	Copy of application and transfer order	22 to 25	"E" & "F"
6.	Copy of departmental appeal	26 to 27	"G"
7.	Wakalatnama	28	

Tufail
...APPELLANT

Through

Dated: 16/9 /2024.

~~(HAIBET KHAN)~~
Advocate High Court Abbottabad

0318 300 5970

BEFORE THE CHAIRMAN SERVICE TRIBUNAL KHYBER
PAKHTUNKHUWA, PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 15875

Dated 19-09-2024

Service Appeal No. 829/2024

Tufail Shakeel SST (Bio/Chem), Govt. High School Samundar Katha, Abbottabad.

...APPELLANT

VERSUS

1. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Education Officer (Male) Abbottabad.

...RESPONDENTS

APPEAL UNDER SECTION 4 OF KHYBER
 PUKHTOON KHAWA SERVICE TRIBUNAL ACT
 1974 SEEKING DECLARATION /DIRECTION TO
 THE EFFECT THAT APPELLANT HAS BEEN
 APPOINTED /POSTED AS SST ON 14/09/2018 AT
 GHS SAMANDAR KATHA (HARD AREA)
 DISTRICT ABBOTTABAD BY THE RESPONDENT
 NO.1 AND APPELLANT SERVED THE
 RESPONDENT DEPARTMENT FOR MORE THAN 06
 YEARS ON THE SAME STATION, THEREAFTER,
 MOVED AN APPLICATION TO RESPONDENT NO.2
 FOR TRANSFER OF APPELLANT FROM GHS

filed to-day

Registrar

SAMUNDAR KATHA (HARD AREA) TO ANY OTHER PLACE AS PER POSTING TRANSFER POLICY BUT RESPONDENT NO.2 INSTEAD OF ADDRESSING THE GRIEVANCE OF APPELLANT ISSUED POSTING TRANSFER ORDER OF OTHER SSTS ON 05/06/2024, FEELING AGGRIEVED FROM THE SAID ACT AND ACTION OF THE RESPONDENT NO.2 THE APPELLANT FIELD THE DEPARTMENTAL APPEAL BEFORE APPELLATE AUTHORITY I.E RESPONDENT NO.1 WHICH HAS NOT BEEN DECIDED YET AND STATUTORY PERIOD OF 90 DAYS HAS LAPSED, WHICH IS SHEER VIOLATION OF LAW ILLEGAL, AGAINST THE POSTING TRANSFER POLICY, THEREFORE, LIABLE TO BE ADDRESSED UNDER THE LAW.

PRAYER ON ACCEPTENCE OF THE INSTANT APPEAL THE ACT AND ACTION OF THE RESPONDENT BY NOT CONSIDERING THE APPLICATION DATE 03/06/2024 AND APPEAL DATED 06/06/2024 MAY KINDLY BE DECLARED NULL AND VOID AND RESPONDENT MAY KINDLY BE DIRECTED TO ISSUE POSTING TRANSFER ORDER OF THE APPELLANT FROM

GHS SAMUNDAR KATHA (HARD AREA) TO ANY OTHER SUITABLE PLACE AS PER THE POSTING TRANSFER POLICY.

Respectful Sheweth:

Following facts which giving instant service appeal are arrayed as under!

1. That, appellant has been appointed as SST on Adhoc Basis by the respondent No.1 in 2018. Copy of appointment posting order Copy of appointment posting order is annexed as Annexure "A".
2. That the appellant has been serving as SST BPS 16 on Adhoc basis at GHS Samundar Katha since 2018 from the order of appointment/posting.
3. That, thereafter respondent No.1 in the light of enactment passed by the Govt. of KPK regarding regularization of SST issued notification of regularization on dated 1/12/2022 in respect of the appellant. (Copy of notification annexed as Annexure "B").

4. That, on 18/7/2023 respondent No.2 issued the posting/transfer order of the different SST including the appellant and on the very next day i.e 19/7/2023 suspended the posting transfer order dated 18/7/23. (Copy of both the orders are attached as Annexure "C" & "D").
5. That on 03/06/2024 appellant submitted an application to the respondent no.2 for his transfer from GHS Samandar Katha (Hard Area) to any suitable place but respondent No.2 has not paid any heed towards this application and issued another transfer order of SSTS on 05/06/2024 wherein the name of the appellant was not included by ignoring the appellant. Copy of transfer order is attached as Annexure "E" & "F"
6. That after this episode appellant submitted departmental appeal to the respondent No.1 for redressal of his grievances but in vain and after the lapse of ninety days the instant service appeal is being field in the highest forum. (Copy of departmental appeal is attached as Annexure "G").

7. That feeling aggrieved by the conduct and action of the respondent instant service appeal is being filed inter alia on the following grounds.

GROUND:

- a. That act/action/conduct of the respondent seems harsh, improper and not in accordance with the norms of service and keeping the appellant at hilly station for such a long period is injustice and action beyond the post transfer policy incorporated in the ESTA code.
- b. That appellant has served with the best of his ability for the entire satisfaction of superior authority and never been found in any disciplinary violations.
- c. That appellant has unblemished service record and always remained serious towards the professional duties and tried to serve the general public at his best.
- d. That even the junior SSTS were transferred from different school but discriminatory conduct is obvious from the record as the

appellant has been serving in hilly area since 2018.

- e. That the respondents have not treated the appellant in accordance with law, policy on the subject acted and violated the Article 04 of the Constitution of Pakistan 1973.
- f. That the service appeal is well within time and Honourable tribunal has jurisdiction to entertain the same.
- g. That rest of the points shall be agitated at the time of arguments.

It is humbly prayed that by accepting the instant appeal, appellant may kindly be transferred to any school of district Abbottabad which falls in the ambit of settled area.

...APPELLANT

Through

Dated: 16/9/2024

(HAIBET KHAN)

Advocate High Court Abbottabad

Haibet Khan
Advocate High Court

VERIFICATION:-

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

...APPELLANT



18/9/24

BEFORE THE CHAIRMAN SERVICE TRIBUNAL KHYBER
PAKHTUNKHUWA, PESHAWAR

Service Appeal No. _____/2024

Tufail Shakeel SST (Bio/Chem), Govt. High School Samundar Katha, Abbottabad.

...APPELLANT

VERSUS

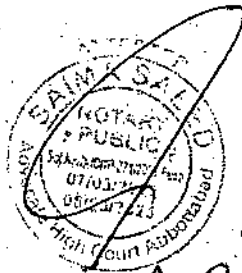
Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar & another.

....RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, Tufail Shakeel SST (Bio/Chem), Govt. High School Samundar Katha, Abbottabad, do hereby solemnly affirm and declare that the contents of forgoing service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Tribunal.



18/09/24

DEPONENT

Abbottabad
pointment Order SST/Abboc

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



APPOINTMENT

(In consequence of the recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the post of Secondary School Teacher (SST Bio Chem) (SST Maths Phy) (SST General) School based to HTS-16 (Rs. 15850-1750-51280) to Rs. 15850/- fixed plus usual allowances as admissible under the rules on cadre basis on contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with effect from the date of their joining on recruitment).

(SST Bio Chem)

Sl. No.	Roll No.	Name	CNIC	Address	Age	NTS Marks	Merit	School
1	11100991	SAAD MEHROZ ABBASI	3740577264845	HOUSE NO 108 STRIKE NO 11 G. KOTI VEHABAD	70.54	66	136.54	GHS
2	261001017	SYED HASSAN SHAH	1310-8254429	SYED HASSAN SHAH	65.28	62	127.28	GHS
3	11100870	MUHAMMAD D WASEEM	11102-0329484	GENERAL STORE MOH. FORANA PH.1 CHINWALI ROAD MANSHERA	67	61	136.7	GHS
4	11101012	MUHAMMAD D SOHAIL	13101 27500369	SHAHZAMAN SHEIKH BANDI PO. SHEIKH HANDE	45.0	50	121.02	GHS
5	11-001-16	WAQAR ALI	13100 8606294	VI ALI G. JALANA TRONO ARBOL ABAD	47	41	119.14	GHS
6	11100830	IFEAD SHANEEF	13101 2105260	ARBOL ABAD NEAR GILSIAN ZABIRI DHEER	63.12	42	119.14	GHS
7	11100858	KHLESHED AHMAD	13101-6875825	CHOWK STREET NEAR PLAZA NEAR PAKISTAN COUNCIL OFFICE OPPOSITE NOKOR	61.12	58	119.14	GHS
8	13101005	SHANIS ISLAM	13101-2270204	ARBOL ABAD NEAR GILSIAN ZABIRI DHEER	63.50	53	119.14	GHS

99

Sr	RollNo	Name	CNIC	Address	Academic Marks	NTS Marks	Merit	School
9	201001282	NAVEED AHMAD NAVEED	13102-0348020-7	THE GROUP OF SCHOOLS COLLEGE NEAR GOVT COMMERCIAL COLLEGE ABBOTTABAD	51.85	65	116.85	GHS Banda Pir Khan
10	111001059	HABIB UR REHMAN	13102-0348020-7	KATCHOPA PO BODIA TEHSIL HAVELI AND DIST ABBOTTABAD	56.62	60	116.62	GHS Keri Raiki
11	111000922	JAYYAD BASHIR	13101-5412749-3	H NO 101 NEAR ARMY BURN HALL COLLEGE HANGI SAYEDAN GULSHAN I GAZI ABBOTTABAD	56.40	60	116.40	GHS Chumbh
12	111001035	Abdul Majeed	13101-0682071-5	Moh Banda Near Colony Harpur	57.10	50	116.10	GHS Har Harpur
13	111001106	DANISH	13101-3306532-3	VILLAGE TANHAN DALA PO ZAFAR MARKET ATD	55.08	60	115.08	GHS Nammal
14	111001129	WASIM AHMED	13101-6031528-7	C/O DR REHMATULLAH QURESHI ASST PROFESSOR OF BOTANY, PMS ARID AGRICULTURE UNIVERSITY RAWALPINDI	55.44	60	115.44	GHS Sanda

(SST Maths Phy)

Sr	RollNo	Name	CNIC	Address	Academic Score	NTS Marks	Total Score	Name of School
1	112000491	USMAN ALAM	13101-5926754-5	VILLAGE AND PO BANDI DHUNDAN TEHSIL AND DIST AHT	69.71	67	136.71	GHS Khanapur
2	192000697	MUHAMMAD SOHAIB ALI	3302-72588	SARDAR COLONY ALP KAN POST OFFICE SAKI SLEPH JARIPOUR C.B-29 22 BEHIND T.G GIRLS COLLEGE KAKUL ROAD ABBOTTABAD	63.32	67	130.32	GHS Chumbh
3	112000770	SAAD SARWAR	13101-9462543-1	JAHANGIR KILAN HOUSE NO 16-19 NEAR AYTSHA MASJID BEHIND ARMY LATS NARRIAN	65.31	63	128.3	GHS Sabon
4	112000758	CHAN ZEB ALAM	13101-1160372-1	ROOM NO 06 SHIMLA HOSTEL LINK ROAD ATD	59.71	66	125.71	GHS Chumbh
5	112000734	ANJUM HAYAT	13101-7605307-1	VILL LODHAANA TEH AND DISTT ATD	62.58	62	124.58	GHS Bagrotar
6	112000900	NASIR MALIK	13101-9177968-9	VILLAGE MALKAN PO	58.3	66	124.3	GHS Tarnawal
7	112000531	MUHAMMAD TAHIR	13101-2783054-1	VILLAGE MALKAN PO	56.57	67	123.57	GHS Chumbh

15

Sr.	Roll No	Name	CNIC	Address	Academic Score	NTS Marks	Total Score	Name of School
				RAJYATI TH HAYATIAN DIST AB				
2	112001398	MUHAMMAD AD ABID	13101-4469719-7	MALIB, SHAI, 7731 REHMAN DIST WARD NO 11, DIST SHEIKH MAMUN MURAI ALI KHAL KUTUB AR RAJDA GILGI	73.15	50	123.15	GHS Lahore
3	112001417	MAKSHAD RUSTAM	13101-6713385-7	PO SALLIAD DIST I ABDOTTABAD	63.67	57	120.67	GHS Sufian
7	112001501	MUHAMMAD AD ABID	13101-6550006-7	VILLAGE AND PO LAKANDI TH AND DIST ABDOTTABAD	61.77	58	119.77	GHS Batali

(SST General)

Sr.	Roll No	Name	CNIC	Address	Academic Marks	NTS Marks	Total Score	Proposed School
1	114001558	AITAUUR REHMAN	13101-0500050-9	MOHIBURWAJID RUMI DISTRICT	61.35	57	118.35	GHS Zafar Muzamam
	114001567	KAMRAN AHMED	13101-2506753-5	AHMED NIGRALAH KURBAN VILLAGE AND DISTRICT	68.77	76	144.77	GHS Khanpur
3	114001228	ABDUS SALAM	13101-629479-5	VILLAGE POKHUSAI SARAI MAMAT SHAM LUSH DISTRICT	72.15	66	138.15	GHS Chambial
4	114001576	FAZAL HAMEED	13101-2543161-5	VILLAGE KANDI GILLI PANDI DHANA TEH AND DIST ABDOTTABAD	64.8	74	138.08	GHS Habiba Batali
5	113001374	MUHAMMAD WASEEM YOUSAF	13101-0403087-3	BOHRA MANSARA SARAI CHAKRI LUSH DISTRICT	62	74	136.0	GHS Batali

[Handwritten Signature]

TERMS & CONDITIONS:

1. NOTA/DA etc is allowed.
2. Change reports should be submitted to all concerned in duplicate.
3. Appointment is purely on temporary & contract basis initially for one year w.e.f 20th September, 2018 to 19th September, 2019.
4. He should not be handed over charge if he exceeds 35 years or below 19 years of age. Age relaxation case may be submitted to competent authority.
5. If any candidate is over age less than two years, their upper age limit less than two years is hereby relaxed.
6. If any meritorious candidate is deprived from appointment by this order and the competent authority accepted his appeal, the appointment order of the low merit candidate will be withdrawn and adjustment order will be revised according to merit.
7. Appointment is subject to the condition that the certificate/documents must be verified from the concerned authorities by the DEO (concerned), any one found producing bogus certificate will be reported to the law enforcing agencies for further action.
8. His services are liable to termination on one month's notice from either side. In case of resignation without notice or one-month pay allowances shall be forfeited to the Government.
9. Pay will not be drawn until and unless a certificate to the effect by DEO (concerned) is found that his certificates are verified.
10. He should join his post within 15 days of the issuance of this notification. In case of failure to join the post within 15 days of the issuance of this notification, his appointment will be considered automatically and no subsequent application shall be entertained.



Abbottabad Male Appointment Order SST Adhoc

4

11. The candidate concerned should produce Health & Age certificate duly signed by Medical Superintendent concerned before taking over charge.
12. He will be governed by the rules and regulations in the field and as may be issued from time to time by the Govt.
13. His contract shall be discontinued at any time, in case his performance is found unsatisfactory.
14. His appointment is made on School based, He will have to serve at the place of posting, and His service is not transferable to any other station.
15. Before handing over charge once again their document may be checked if they have not the required relevant qualifications as per rules, they may not be handed over charge of the post.

(Farid Ahmad Khattak)

Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Encl: No. 662-74 / File No. 1 / SST / Adhoc / Appt: / 2018 Dated Peshawar the 14 / 09 / 2018.

Copy forwarded for information and necessary action to the:

1. Accountant General Khyber Pakhtunkhwa Peshawar
2. Secretary Khyber Pakhtunkhwa Public Service Commission Peshawar.
3. District Education Officer (Male) concerned.
4. District Accounts Officer Concerned
5. Official Concerned.
6. PS to the Secretary to Govt. Khyber Pakhtunkhwa ESSE Department.
7. PA to the Director ESSE Khyber Pakhtunkhwa Peshawar.
8. M/ file

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

14/9/18

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Page 18 of 19

Ann B
18



Regularization of Adhoc SST of District Peshawar (Male) 2022

**Directorate of Elementary and Secondary Education
Khyber Pakhtun Khwa Peshawar**

Notification

Under the provision of the Khyber Pakhtunkhwa Teachers (Appointment and Regularization of Services) Act, 2022 (Khyber Pakhtunkhwa Act No.XI.J of 2022), the services of the following Secondary School Teachers Male (SST) from BPS-16, SST Math/Phy BPS-16, SST General BPS-16 and SST IT BPS-16 appointed on Adhoc/Contract basis w.e 10/01/2017, are hereby regularized in Teaching Cadre on the terms and conditions given below with effect from the date of their initial appointment till the commencement of the Act ibid:

2018 SST General										
S. #	Roll #	Name Of SST	Father Name	CNIC	D.O.B	Total Marks	School	Advertisement No and Date	Appnt Order No and Date	Extension Order No and Date
1	11091 1507	Kamran Akbar	Muhammad Younis Mir Khan	11101-8596731-5	21-06-1991	144.77	GHS Khanpur	INF-6749	Ends.No 668-74 / F.No.4/SST/Adhoc/Appnt./2018 dated 14-09-2018.	No.1135-43/ F.No.A- 14/ SST(M)Contract Extension dated 01-01-2020
2	11099 1071	Muhammad Asad Khan	Muhammad Pervez Khan	11101-502515-5	10-01-1985	131.08	GHS HAJMIRA HANDE	INF-6749	Ends.No 3606-12/F.No. No.1/SST/Adhoc/Appnt./2018 dated 11-12-2018.	No.1135-43/ F.No.A- 14/ SST(M)Contract Extension dated 01-01-2020
3	11099 1506	Sajid Akram	Akram	11101-7907196-3	06-03-1992	83.14	GHS LAKHAI. A	INF-6749	Ends.No 3606-12/F.No. No.1/SST/Adhoc/Appnt./2018 dated 11-12-2018.	No.1135-43/ F.No.A- 14/ SST(M)Contract Extension dated 01-01-2020
4	11200 0977	Abdul Shakoor	Kala Khan	11101-1831455-0	30-04-1983	114.69	GHS NATHIA GALI	INF-6749	Ends.No 1640-1705/F.No. No.2/SST/Adhoc/Appnt./2018 dated 09-08-2019.	No.1135-43/ F.No.A- 14/ SST(M)Contract Extension dated 01-01-2020
2018 SST Bio-Chem										
S. #	Roll #	Name Of SST	Father Name	CNIC	D.O.B	Total Marks	School	Advertisement No and Date	Appnt Order No and Date	Extension Order No and Date
1.	11100 0981	Saad Mehmood Abbasi	Ashraf Mehmood	37405-7774645-5	01-05-1991	136.54	GHS Phalia	INF-6749	Ends.No 668-74 /F.No.4/SST/Adhoc/Appnt./2018 dated 14-09-2018.	1135-43/ F. No.A- 14/ SST (M)Contract Extension dated 01-01-2020
2.	11100 0870	Muhammad Wassim	Muhammad Ashraf	13102-0342948-5	06-03-1994	126.3	GHS Nagri Tatal	INF-6749	Ends.No 668-74 /F.No.4/SST/Adhoc/Appnt./2018 dated 14-09-2018.	1135-43/ F. No.A- 14/ SST (M)Contract Extension dated 01-01-2020
3	11100 1012	Muhammad Sohail	Shahid Ahmad	13101-2759903-9	11-06-1994	124.92	GHS Katala	INF-6749	Ends.No 668-74 /F.No.4/SST/Adhoc/Appnt./2018 dated 14-09-2018.	1135-43/ F. No.A- 14/ SST (M)Contract Extension dated 01-01-2020

Handwritten signature and date: 15/10/20

Regularization of Adhoc SST of District Abbottabad (Male) 2022

13

4	11100 1036	Waqar Ali	Ali Afsar	13101- 9639629-3	03-08- 1991	120.5	GHSS Nagri Bala	INF-6749	Endst.No 668-74 /F.No.4/SST/ Adhoc/Apppt: /2018 dated 14-09-2018.	1135-43/ F. No.A- 14/ SST (M)Contract Extension dated 01-01- 2020
5	11100 0830	Tufail Shakeel	Sardar Shakeel Anwar	13101- 3210526-9	01-03- 1994	120.37	GHS Samundar Katha	INF-6749	Endst.No 668-74 /F.No.4/SST/ Adhoc/Apppt: /2018 dated 14-09-2018.	1135-43/ F. No.A- 14/ SST (M)Contract Extension dated 01-01- 2020
6	11100 1005	Shamsul Islam	Waheed Gul	13101- 7222939-5	21-02- 1992	116.97	GHS Ghambeer	INF-6749	Endst.No 668-74 /F.No.4/SST/ Adhoc/Apppt: /2018 dated 14-09-2018.	1135-43/ F. No.A- 14/ SST (M)Contract Extension dated 01-01- 2020
7	26100 1282	Naveed Ahmad Naveed	Muhamm ad Zareed	13101- 6361458-9	06-03- 1983	116.88	GHS Banda Pir Khan	INF-6749	Endst.No 668-74 /F.No.4/SST/ Adhoc/Apppt: /2018 dated 14-09-2018.	1135-43/ F. No.A- 14/ SST (M)Contract Extension dated 01-01- 2020
8	11100 0922	Tayyab Bashir	Heji Bashir Hussain	13101- 5442749-3	12-02- 1987	116.49	GHS Chunali	INF-6749	Endst.No 668-74 /F.No.4/SST/ Adhoc/Apppt: /2018 dated 14-09-2018.	1135-43/ F. No.A- 14/ SST (M)Contract Extension dated 01-01- 2020
9	11100 1035	Abdul Majeed	Muhamm ad Aslam	13101- 1682971-5	10-10- 1993	116.19	GHS Hari Khetar	INF-6749	Endst.No 668-74 /F.No.4/SST/ Adhoc/Apppt: /2018 dated 14-09-2018.	1135-43/ F. No.A- 14/ SST (M)Contract Extension dated 01-01- 2020
10	11100 1106	Danish	Farid	13101- 3396332-3	10-04- 1995	115.98	GHS Nammal	INF-6749	Endst.No 668-74 /F.No.4/SST/ Adhoc/Apppt: /2018 dated 14-09-2018.	1135-43/ F. No.A- 14/ SST (M)Contract Extension dated 01-01- 2020

2018 SST Maths-Phy

S. #	Roll #	Name Of SST	Father Name	CNIC	D.O.B	Total Marks	School	Advertisement No and Date	Apper Order No and Date	Extension Order No and Date
1.	19200 0667	Muhammad Shauq Ali	All Manzoor	13302- 7255877-7	28-06- 1991	130.32	GHS Ghambeer.	INF-6749	Endst.No 668- 74 /F.No.4/SST/A dhoc/Apppt:/20 18 dated 14- 09-2018.	1135-43/ F.No.A- 14/SST(M)Con tract Extension dated 01-01- 2020
2.	11200 0770	Saad Sarwar	Ghulam Sarwar	13101- 9462543-1	05-11- 1988	128.3	GHS Satera	INF-6749	Endst.No 668- 74 /F.No.4/SST/A dhoc/Apppt:/20 18 dated 14- 09-2018.	1135-43/ F.No.A- 14/SST(M)Con tract Extension dated 01-01- 2020
3.	11200 0758	Chan Zeb Ali	Fahangir Khan	13101- 1166372-1	07-06- 1992	125.74	GHS Chambhali	INF-6749	Endst.No 668- 74 /F.No.4/SST/A dhoc/Apppt:/20 18 dated 14- 09-2018.	1135-43/ F.No.A- 14/SST(M)Con tract Extension dated 01-01- 2020

17-01-22

147
 Registration of Adhoc SST of District Abbottabad (Male) 2022

Sl. No.	Roll #	Name of SST	Father Name	CNIC	DOB	Total Marks	School	Advertisement No and Date	Appt Order No and Date	Examination Order No and Date
1	11180	FATMA KHAN	GHANM KHAN	13101-139951-7	1997	120.00	INFP/228	No. S/A-153716 14 SST Adhoc 19/11/2020 14/11/2020	No. S/A-153716 14 SST Adhoc 19/11/2020 14/11/2020	19/11/2020
2	11180	FATMA KHAN	GHANM KHAN	13101-139951-7	1997	120.00	INFP/228	No. S/A-153716 14 SST Adhoc 19/11/2020 14/11/2020	No. S/A-153716 14 SST Adhoc 19/11/2020 14/11/2020	19/11/2020
3	11180	ABDUL RAHMAN	ABDUL RAHMAN	13101-139951-7	1997	120.00	INFP/228	No. S/A-153716 14 SST Adhoc 19/11/2020 14/11/2020	No. S/A-153716 14 SST Adhoc 19/11/2020 14/11/2020	19/11/2020
4	11180	ABDUL RAHMAN	ABDUL RAHMAN	13101-139951-7	1997	120.00	INFP/228	No. S/A-153716 14 SST Adhoc 19/11/2020 14/11/2020	No. S/A-153716 14 SST Adhoc 19/11/2020 14/11/2020	19/11/2020
5	11180	ABDUL RAHMAN	ABDUL RAHMAN	13101-139951-7	1997	120.00	INFP/228	No. S/A-153716 14 SST Adhoc 19/11/2020 14/11/2020	No. S/A-153716 14 SST Adhoc 19/11/2020 14/11/2020	19/11/2020
6	11180	ABDUL RAHMAN	ABDUL RAHMAN	13101-139951-7	1997	120.00	INFP/228	No. S/A-153716 14 SST Adhoc 19/11/2020 14/11/2020	No. S/A-153716 14 SST Adhoc 19/11/2020 14/11/2020	19/11/2020
7	11180	ABDUL RAHMAN	ABDUL RAHMAN	13101-139951-7	1997	120.00	INFP/228	No. S/A-153716 14 SST Adhoc 19/11/2020 14/11/2020	No. S/A-153716 14 SST Adhoc 19/11/2020 14/11/2020	19/11/2020
8	11180	ABDUL RAHMAN	ABDUL RAHMAN	13101-139951-7	1997	120.00	INFP/228	No. S/A-153716 14 SST Adhoc 19/11/2020 14/11/2020	No. S/A-153716 14 SST Adhoc 19/11/2020 14/11/2020	19/11/2020

2020 SST Maths-Pby

2020 SST Bio-Chem

C/O
 15/11/2020

Regularization of Adhoc SST of District Abbottabad (Male) 2022

15

4	11500 936	Muhammad Waseem	Aurang Zeb	42101- 3560188-0	25-Dec- 1992	133.72	GHS Secr Abbottaba d.	INF(P)401 9/20	Endst: No. 4622-28/File No. S/A-14/ SST/Adhoc/ Appr/ BPS- 16) dated 16- 04-2021.	* N/A
5	11501 364	Kamran Ahmad MALA	Muhamma d Raza Awan	13502- 9506719-5	4-Jun- 1994	133	GHS Nagri Tutal.	INF(P)401 9/20	Endst: No. 4622-28/File No. S/A-14/ SST/Adhoc/ Appr/ BPS- 16) dated 16- 04-2021.	* N/A
6	11501 641	Umar Nazir	Mohammd Nazir	13101- 9509220-3	12-Mar- 1995	132.85	GHS Hagnotar.	INF(P)401 9/20	Endst: No. 3505-10/File No. S/A-10/ SST/Adhoc/ Appr/ BPS- 16) dated 04- 08-2021.	* N/A
7	11900 024	Dawood Dawud	Nazir Bhatti	13101- 7283195-3	14-01- 1992	98.20	GHS Kokal Haroon A. Akad.	INF(P)401 9/20	Endst: No. 33537 /File No. S/A- 14/ SST Minority/Disab le/Adhoc/ Appr/ BPS- 16) dated 21- 02-2022.	* N/A

2021 SST Bio-Chem

S. #	Roll #	Name Of SST	Father Name	CNIC	D.O.B	Total Marks	School	Advertisment No and Date	Appr Order No and Date	Extension Order No and Date
1.	11101 379	Aam Jafar	Zaboor Khan	13101- 2407392-7	7-Jun- 1997	145.96	GHS Kutawal Abbottaba d.	INF(P)401 9/20	Endst: No. 4622-28/File No. S/A-14/ SST/Adhoc/ Appr/ BPS- 16) dated 16- 04-2021.	* N/A
2.	11101 526	Bilal Akbar	Ali Akbar	13101- 7717675-1	5-Jun- 1997	145.50	GHS Khair Gali Abbottaba d.	INF(P)401 9/20	Endst: No. 4622-28/File No. S/A-14/ SST/Adhoc/ Appr/ BPS- 16) dated 16- 04-2021.	* N/A
3.	11101 534	Rizwan Akbar	Jahangir Khan	13101- 2468705-7	23-Oct- 1996	143.83	GHS Makool Prycon Abbottaba d.	INF(P)401 9/20	Endst: No. 4622-28/File No. S/A-14/ SST/Adhoc/ Appr/ BPS- 16) dated 16- 04-2021.	* N/A
4.	11101 564	Jahanzeb Khan	Aurangzeb Khan	13101- 3188300-1	20-Apr- 1995	138.90	GHS Hadom Bandi A/Abad	INF(P)401 9/20	Endst: No. 4622-28/File No. S/A-14/ SST/Adhoc/ Appr/ BPS- 16) dated 16- 04-2021.	* N/A
5.	11101 532	Mohsin Ali	Ghulam Mustafa	13101- 2889955-7	1-Jul- 1998	136.95	GHS Phalsh A/Abad	INF(P)401 9/20	Endst: No. 4622-28/File No. S/A-14/ SST/Adhoc/ Appr/ BPS- 16) dated 16- 04-2021.	* N/A
6.	11101 435	Shayyar Javed	Javed Akbar	13101- 5982971-1	18-Apr- 1998	135.45	GHS Lam A/Abad	INF(P)401 9/20	Endst: No. 4622-28/File No. S/A-14/ SST/Adhoc/ Appr/ BPS- 16) dated 16-	* N/A

Regularization of Adhoc SST of District Abbottabad (Male) 2022

18

11101 599	Muhammad Nasir	Nasim Alhina	11101 9059064-9	11-Dec- 1991	111.19	GHS Tajwal Abbottaba d	INF(P)401 9/20	Encl. No 4622-28 File No S A-14 SST Adhoc Appr. BPS- 16) dated 15- 04-2021	* N/A
11101 557	Shera Iqbal	Iqbal Khan	11101- 5415715-7	20-Dec- 1992	133.22	GHS Zairat Masoom A Abad	INF(P)401 9/20	Encl. No 4622-28 File No S A-14 SST Adhoc Appr. BPS- 16) dated 15- 04-2021	* N/A
11101 381	Awas Ahmed	Fazal Dan	17903- 2849248-5	7-Oct- 1998	112.78	GHS Nakar Khan Kalan A/Abad	INF(P)401 9/20	Encl. No 4622-28 File No S A-14 SST Adhoc Appr. BPS- 16) dated 15- 04-2021	* N/A

2021 SST Maths-Phy

S. #	Roll #	Name Of SST	Father Name	CNIC	D.O.B	Total Marks	School	Advertisment No and Date	Appn Order No and Date	Estimate Order No and Date
1	11200 755	Zahir Altaf	Muhamm ad Altaf	13101- 1842126-7	8-Nov- 1995	138.55	GHS Zairat Masoom A Abad.	INF(P)40 19/20	Encl. No 4622-28 File No S A-14 SST Adhoc Appr. BPS- 16) dated 15- 04-2021	* N/A
2	11201 085	Muhammad Tauseef Javed	Mubarrat ad Javed	42501- 5020053-5	11-Nov- 1996	135.82	GHS Majrhan Abbottab ad.	INF(P)40 19/20	Encl. No 4622-28 File No S A-14 SST Adhoc Appr. BPS- 16) dated 15- 04-2021	* N/A
3	11201 322	Umar Ashraf	Muhamm ad Ashraf	13101- 2417059-5	8-Aug- 1993	132.33	GHS Lahoor Abbottab ad.	INF(P)40 19/20	Encl. No 4622-28 File No S A-14 SST Adhoc Appr. BPS- 16) dated 15- 04-2021	* N/A
4	11201 038	Mubarrat Tahir	Abdur Rashid	13101- 5927359-3	24-Mar- 1992	132.329 2	GHS Lakhsa Abbottab ad.	INF(P)40 19/20	Encl. No 4622-28 File No S A-14 SST Adhoc Appr. BPS- 16) dated 15- 04-2021	* N/A
5	11200 909	Hassan Hanif	Muhamm ad Hanif	13101- 8043932-7	18-Feb- 1996	131.454 8	GHS Sumam Karaga A/Abad.	INF(P)40 19/20	Encl. No 4622-28 File No S A-14 SST Adhoc Appr. BPS- 16) dated 15- 04-2021	* N/A
6	35200 367	Bakhtawar Pervaiz	Mubarrat ad Pervaiz	17901- 9824271-3	05-02- 1994	130.10	GHS Chenab A/Abad	INF(P)40 19/20	Encl. No 5385-18 File No S A-14 SST Adhoc Appr. BPS- 16) dated 04- 08-2021	* N/A

2021 SST IT

S. #	Roll #	Name Of Set	Father Name	CNIC	D.O.B	Total Marks	School	Advertisment No and Date	Appn Order No and Date	Estimate Order No and Date
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Regularization of Adhoc SST of District Abbottabad (Male) 2022

17

62344	Zia-Ur-Rehman	Anayat-Ur-Rehman	13101-02-1519-7	11-MAR-1998	15141	GHS MCOE VAID	INF(P) 6079-21 Dated 03-15-2022	Endst No 2054-60 File No A- 15 SST(M) A dhac Appt 2 022 (DPS-16) Dated 07-09-2022	Nil
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* N.A stands for Not Available

Terms and Conditions:-

- 1 Their services shall be governed by the Khyber Pakhtunkhwa Civil Servant Act, 1973, the Khyber Pakhtunkhwa (Appointment, Deputation, Posting and Transfer of Teachers, Lecturers, Instructor and Doctors) Regularity Act, 2011, and such rules and regulation as may be issued from time to time by Government.
- 2 Their services will be considered regular and they shall be eligible for pension deduction of GP Fund in term of Khyber Pakhtunkhwa Civil Servant Act, 1973, as amended in 2013, however, the teachers appointed on or after 07/06/2022 shall be dealt with Section (2)(2) of the Khyber Pakhtunkhwa (Amendment) Act, 2022.
- 3 Their services are liable to termination on one month notice from either side. In case of resignation without notice, their one month pay allowances shall be forfeited to the Government.
- 4 They shall possess the same qualification and experience required for the subject post on regular basis as specified in Section (3) (a) of the Act.
- 5 Their regularization shall not affect the service promotion quota of all service cadres as specified in Section (3) (c) of the Act.
- 6 They shall be entitled for seniority and pay from the date of initial appointment on Adhoc Contract basis as specified in Section (3) (d) of the Act.
- 7 They shall perform duty for at least three years from the date of taking over charge where they were appointed/posted initially.
- 8 The regularization shall not be in favor of those teachers who have not taken over charge, remained absent from duty and resigned from service.
- 9 The Teacher, Regularized through this notification, shall be confirmed after successful completion of In-service mandatory training as specified in their Service Rules notified vide notification No SO (PI) 4-5/SSRC/Meeting/2012/Teaching Cadre 2017 dated 07/03/2018 within two consecutive attempts otherwise their appointment orders shall be considered as withdrawn cancelled from the date of declaration of result of the second attempt made in the induction program.
- 10 DEOs are directed to check/verify the documents/ Extension Orders etc service of the regularized teachers once again with the criteria mentioned for regularization. If the teachers don't meet the criteria their service shall be considered as ceased.

(Hafiz Dr. Muhammad Ibrahim)
Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

D.F.C.
3/11/22

4058-56

Endst: No / File No.A-1/SST (M)/Regularization/2018-22 A/Abad Dated Peshawar the 11/11/2022

Copy forwarded for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar
2. Secretary Khyber Pakhtunkhwa Public Service Commission Peshawar.
3. District Education Officer (M) Abbottabad.
4. District Accounts Officer Abbottabad.

**OFFICE OF THE DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD.**

18 And
"C and D"

OFFICE ORDER.

Upon the recommendation by Advisor to Chief Education and approval of the competent authority, Transfer of SSTs is hereby ordered against their names in the interest of public service with effect from their date of taking over charge.

ban by Advisor to Chief Education and approval of the competent authority, Transfer of SSTs is hereby ordered against their names in the interest of public service with effect from their date of taking over charge.

S#	NAME/DESIGNATION	PRESENT STATION	TO	REMARKS
1	Mr. Shahzad Akhtar SST (Bio:Chemistry)	GHS Hari Khaitar	GHS Hari Khaitar	Against Vacant Post
2	Mr. Tufail Shakeel SST (Bio:Chemistry)	GHS Samundar Katha, Abbottabad	GHSS No.01 A/Abad	Vice S#01
3	Mr. Basharat Khan SST (Bio:Chemistry)	Return from leave	GHS Samundar Katha	Vice S#02
4	Asif SST (Math:Physics)	GHS Sarhan	GHS Hadora Bandi	Against Vacant Post

Note:

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

Sd
DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD.

Endst: No. 5379-89 /Transfer/EB-I/115 Dated A/Abad the 18/7/2023.

Copy for information to the:-

1. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Account Officer Abbottabad.
3. District Monitoring Officer (EMA) Abbottabad.
- ✓ 4. Principal/Head Master concerned.
3. Official concerned.
4. AP EMIS branch local office.

(Signature)
DY. DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD.

5.2.2023
(Signature)
c/c

18/07/23

19

OFFICE OF THE DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD.

OFFICE ORDER.

Consequent upon the approval of Competent Authority this office order issued under Endst.No.5379/Transfer/EB-I/115 dated 18-07-2023 is hereby held and abeyance in the best interest of public service till further order.

^{20.}
DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD.

Endst: No. 5406-09 /Transfer/EB-I/115 Dated A/A had the 19/7 /2023.

Copy for information to the:-

1. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Account Officer Abbottabad.
3. District Monitoring Officer (EMA) Abbottabad.
4. Principal/Head Master concerned.
- ✓ 3. Official concerned with the direction not to assume/relinquish charge.
4. AP EMIS branch local office.

- f -
DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD.

20/7/23

OFFICE OF THE PRINCIPAL GOVERNMENT HIGH SCHOOL SAMUNDAR KATHA ABBOTTABAD

RELIEF REQUEST

Consequent upon the order of District Education Officer Abbottabad dated 13/07/2023, it is certified that Mir Tufail Shakeel Post SST (Block No. 90) of Government High School Samundar Katha Abbottabad has been transferred to Government High School Samundar Katha Abbottabad for relief from Government High School Samundar Katha Abbottabad dated 13/07/2023 respectively.

(Signature)
18/7/23

Principal
Government High School
Samundar Katha

Re posted immediately to school on 17/07/2023

(Signature)
19/7/2023

Principal
Government High School
Samundar Katha Attd

(Signature)
16/9/24

(Signature)
16/9/24

To

The Principal
GHS No. 01 Akbar

Subject: Annual Report.

Sir

In Compliance with the order of
Muzikar DED (Muz) Akbar office order
issued under Encls. No. 5379-84 Dated
18-07-2023

I Mr. Tufair Shakeel SST (B/C)

Submit my annual report for duty today
on 19-07-2023 (Fri)

Dated 19-07-2023

Tufair Shakeel
SST (B/C)

Received
19/7/2023

19/7/2023

S/C

19/7/2023

(91)

22

ANX "E" and "B"

To,

The District Education Officer (Male),
Abbottabad

Subject: Application for Transfer as SST (Bio/Chem) from GHS Samundar Katha to a school near my residence i.e. GHSS NO.3, GCMHS NO.2, and GHS Dhamapur.

Respected Sir,

I am writing to request a transfer from my current position as Secondary School teacher - SST (Bio/Chem) at Government High School Samundar Katha to a school closer to my residence in the city.

It is stated that I have been serving at GHS Samundar Katha with dedication and commitment since 25/09/2018. During my tenure, I have strived to provide the best possible education and support to my students. However, due to recent personal circumstances, it has become increasingly challenging for me to commute a daily 90 Km distance (45 Km travelling towards school and 45 Km travelling back towards home).

Taking you back to the previous year, I applied (Diary No. 3705) dated 12/07/2023 and a transfer order was issued on 18/07/2023 to GHSS No.1 Abbottabad. The office of Principal of GHS Samundar Katha had relieved me on consequent upon office order Endorsed No. 5379-84/Transfer/EB/115 dated 18/07/2023 issued by your kind office. I submitted an absence report at GHSS NO.1 Abbottabad dated 19/07/2023. However, the office of GHSS NO.1 had denied to give a charge report to me based on office order 5406-09/Transfer/EB-1/115 dated 19/07/2023 in which previous office order had been held and abeyance. The reasons of transfer held and abeyance were unknown and did not disclose to anyone till current date. In fact, no cancellation orders have been issued yet. Similarly, due to the unavailability of SST (Bio/Chem) posts and pre and post-election commission bans on posting/transfer in Khyber Pakhtunkhwa office orders (E&SED/S-171&SED/2023, E&SED/2-1/posting-transfer/cancellation/withdrawal/2023 dated 18th October, 2023 and E&SED/Mis/11-1/2024 dated 22/03/2024), I have not pursued my case for transfer. It is injustice towards me not to uplift my transfer held and abeyance order even an approximately a year has been passed despite my long service and significant personal hardships. I believe a transfer would allow me to serve more effectively while addressing my well-being.

Now, the information comes from reliable sources that the posts of SST (Bio/Chem) from various schools of Abbottabad will be vacant in the upcoming days after the promotion of teachers as subject specialists. I kindly request a transfer to one of the following schools which are in proximity to my home:

- Government Higher Secondary School No.3 Abbottabad.
- Government Centennial Model High School No2 Abbottabad.

16/9/24
Faiber Khan
District Education Officer
Abbottabad

PROCESSED
16/9/24
Next Full

3-6-24

Government High School (M) Abbottabad

A transfer to any of these schools or nearby schools would significantly reduce my commuting time and enable me to focus more effectively on my teaching responsibilities and personal well-being. I am confident that this change will enhance my productivity and allow me to contribute even more effectively to the academic development of the students.

I have attached all the necessary documents to support my application. I would be grateful if you could consider my request favorably and facilitate my transfer at your earliest convenience.

Thank you for your understanding and cooperation. I look forward to a positive response from you.

Yours Sincerely

Tufail

Tufail Shaukat
SST (Bio, Chem), GHS Samundar Katha,
Cell No: 92-340-0962713.
Date: 03rd June, 2024.

Forwarded to his worthy DEO (M) Abbottabad in original with remarks that applicant has been performing his duties at this school since 25-9-2017 and for further action with the condition of substitute please.

Principal
3/6/24

Principal
Govt. High School
Samundar Katha Aiu

Haibet Khan
Advocate High Court

H. Meera

24

DISTRICT EDUCATION OFFICER
ABBOTTABAD.

Encl: No. *2/1/11*
1/EB-1/

Dated A/A bad the *14/1/2024*

Copy for information to the:

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Controller of Accounts Abbottabad.
3. District Monitoring Officer (DMA) Abbottabad.
4. Principal/ Head Master concerned.
5. Assistant director it local office with the direction to update the HRIS data accordingly.
6. Office Record.

Khan
DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD.

gic
14/1/24

25



OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
ABBOTTABAD
☎ 0992-921102
✉ em1sabbottjabbad@yahoo.com



OFFICE ORDER.

The transfer of following SSTs is hereby ordered on their own pay & BPS as recorded against their names in the interest of public service with effect from the date of taking over charge.

S. No	Name / Designation	From	To	Remarks
1	Muhammad Zeeshan SST (M/P)	GHS Rich Bhen A/Abad	GHS Pawa A/Abad	Vice S.No. 2
2	Saqib Hussain SST (M/P)	GHS Pawa A/Abad	GHS No. 3 A/Abad	Against Mr. Sabir Hussain SST (M/P) Promoted as HM
3	Rashid SST (B/C)	GHS Lashoor A/Abad	GHS No. 3 Nawansher A/Abad	Against Mr. Muhammad Jawad SST (B/C) promoted as SS Eng.
4	Mr. Asif Khan (G)	GHS Namir Maira A/Abad	GHS Kakul A/Abad	Against Mr. Tahir Hussain Shah SST (M/P) Promoted.
5	Mr. Asad SST (G)	GHS Bagh A/Abad	GHS No. 4 A/Abad	Against Mr. Muneer Ahmad SST (G) promoted as H.M.
6	Mr. Muhammad Akram SST (G)	GHS Pawa A/Abad	GHS Jhangl A/Abad	Against vacant post.
7	Mr. Ahmad Ali SST (B/C)	GHS Bori A/Abad	GHS Dhamtour A/Abad	Against Mr. Rashid Ali Khan SST (B/C) Promoted.
8	Mr. Taimur SST (G)	GMS Shaheedabad A/Abad	GMS Thatthi Faqir Sahib Abad	Against Vacant Post
9	Mr. Muhammad Sohaib SST (M/P)	GHS Langrial A/Abad	GMHS No. 2 Havelian	Against Mr. Shahid Hussain (Bio/Chem) promoted.
10	Mr. Mohsin Ali SST (Bio/Chem)	GHS Phullaht A/Abad	GMHS No. 2 A/Abad	Against Mr. Naimat Khani SST (B/C) Promoted.
11	Mr. Muhammad Sudheer SST (G)	GMS Guldehake A/Abad	Jicka Model Dhamtour A/Abad	Mr. Arshad SST (G) Promoted.
12	Zahid Khan SST (G)	GMS Nakar Khan Kalan A/Abad	GMS Gai Dhok A/Abad	Against S. No. 11
13	Mr. Khawar Mujtaba SST (G)	GHS Khanipur Ayubia A/ABAD	GHS Jhangra A/ABAD	Against Mr. Sadeeq ur Rehman SST (G) Promoted
14	Mr. Sardar Saad Ali SST (M/P)	GHS Moolia A/Abad	GHS No. 3 A/Abad	Vice S. No 1

Note:

- Charge report should be submitted to all concerned.
- All those teacher who transfer against the promoters will assumed the charge after issuance of promotion order.
- No TA/DA & T/G is allowed.

26

Anx "G"

To,

The Director,
Elementary and Secondary Education,
Peshawar, Khyber Pakhtunkhwa.

Subject: Appeal Against the Adjustment Transfer of Secondary School Teachers (Bio/Chem) Office Order Endst: No. 3694-10/EB-I/ dated 5th June 2024 in District Abbottabad (Tenure – 05 years, 08 months and 10 days).

Respected Sir,

I am writing to formally appeal against the recent adjustment transfer orders Endst: No. 3694-10/EB-I/ dated 5th June, 2024 of SST's issued by District Education Office (DEO) Male Abbottabad.

I am currently serving as an SST (Bio/Chem) in GHS Samundar Katha and have been dedicated to this position since 25/09/2018 (Tenure – 05 years, 08 months and 10 days). It has come to my attention that some teachers with shorter tenures have been given preference over me for transfer and adjustment to desired locations.

Recently, I moved an application for transferring me near to my residence, but the District Education Office (Male) Abbottabad has not considered it despite my long tenure and daily commute from my home to school and vice versa (90 Km distance daily) and transferred the teachers with less tenure than me by office order Endst: No.3694-10/EB-I/ dated 05/06/2024.

The list of SST (Bio/Chem) with shorter tenures than me are listed below:

S.NO	Name of SST's (Bio/Chem)	Date of 1 st Appointment	Date of Taking Charge in Current School	Tenure (Years)	Transfer From	Transfer To
1.	Rashid	22/03/2018	2019 (Transfer due to local community interference)	5 Years	GHS Lahoor Atd	GHS Nawasher Atd
2.	Adnan Ali	13/05/2020	2020	4 Years	GHS Boi Atd	GHS Dhamtour Atd
3.	Mohsin Ali	16/04/2021	2021	3 Years	GHS Phallah Atd	GCHMS NO.2 Atd

HC
Haidat Khan
Advocate High Court
16/09/24

(27)

In light of the above, I kindly request your reconsideration of the transfer decisions, ensuring that seniority and length of service are given due importance. I believe this will promote fairness and maintain the morale and motivation of long-serving teachers like myself in schools of far away from my residence.

Taking you back to the previous year, I applied (Diary No. 3705) dated 12/07/2023 and a transfer order was issued (Endstt No: 5379-84/Transfer/EB/115 : dated 18/07/2023/18/07/2023). Following the issuance of relieving chit from the office of Principal of GHS Samundar Katha, I submitted an arrival report but the office of GHSS No.1 Abbottabad denied giving a charge report based on office order 5406-09/Transfer/EB-I/115 dated 19/07/2023 in which previous office order had been held and abeyance. Even after a year has passed, this office order of held and abeyance is not cancelled. This unexpected development has caused significant inconvenience and uncertainty. I submitted an appeal to your kind office dated 24/07/2023 but no response has been received yet. I seek clarification on the reasons behind the hold and the anticipated timeline for resolving the abeyance of my transfer or transfer me to nearby school from my residence.

I have attached all the necessary documents to support my application. I would be grateful if you could consider my request favourably and facilitate my transfer at your earliest convenience.

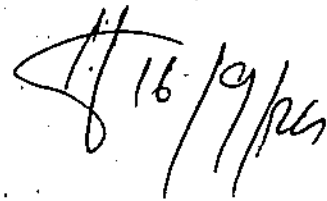
Thank you for your time and understanding. I am confident that you will take the necessary steps to address this matter promptly and justly. I look forward to your positive response.

Yours Sincerely,



Tufail Shakeel
SST (Bio/Chem), GHS Samundar Katha,
Abbottabad.
Cell No: +92-340-0962713
Dated: 06/06/2024


Haibet Khan
Advocate High Court



S.No. 234698 Mob: 0318-3005970
 Name of Advocate سید فاضل
 DBA NO. 174 TBA NO. _____
 BC No. _____ R.s.200/=



وکالت نامہ
 28
 SAIRANAVED
 Finance Secretary
 District Bar Association
 Abbotabad

بعدالت اپنے چیئرمین کی طرف سے

عنوان: Director, Education
Tufail Sharceel نام

منجانب: Service appeal
 نوعیت مقدمہ: باعث تحریر آنکھ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے دائلے دی و تہا دی برائے پیش یا تصفیہ مقدمہ بمقام Chairman
Haider Khan Advocate High Court
 کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوں گا اور بروقت پکارے
 جانے مقدمہ وکیل صاحب موصوف کا اطلاع دے کر حاضر عدالت کروں گا۔ اگر پیشی پر مظہر حاضر نہ ہوگا اور مقدمہ میری غیر حاضری کی وجہ
 سے کسی طور پر میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طور پر ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام پکھری کے
 علاوہ کسی جگہ یا پکھری کے اوقات سے پہلے یا چھپے یا بروقت تظیل ہی وی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ پکھری کے علاوہ کسی اور جگہ
 سماعت ہونے پر یا بروقت تظیل یا پکھری کے اوقات کے آگے چھپے پیش ہونے پر مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے
 کسی معاوضہ کے ادا کرنے یا عفا کرنے کے واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پراخت صاحب موصوف
 مثل کردہ ذات منظور و قبول ہوگا اور صاحب موصوف کو عرض دہانی یا جواب دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی اپیل مگرانی دہرسم
 درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کرنے اور ہر قسم کا روپیدہ وصول کرنے اور رسید دینے اور داخل کرنے
 اور ہر قسم کے بیان دینے اور اس پر حاشی اور رضی نامہ فیصد بر حلف کرنے اقبال دعویٰ دینے کا بھی اختیار ہوگا اور بصورت جانے بیرونجات
 از پکھری صدر اہل ویر آمد کی مقدمہ یا سنوٹی ڈگری یا کٹرز درخواست حکم امتحانی یا قرقی یا گرفتاری نکل از گرفتاری اجراءے ڈگری بھی صاحب
 موصوف کو بشرط ادا جنگ علیحدہ و مختارہ بروی اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکور یا اس کے
 کسی جزوی کاروائی کے یا بصورت اپیل کسی دوسرے وکیل کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے وکیل کو بھی ہر امر میں
 وہی اور ویسے اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ جو کچھ ہر جاتہ اتوا پڑے گا وہ صاحب موصوف
 کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ
 کی ہی نہ کریں اور اسکی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔
 لہذا وکالت نامہ لکھ دیا ہے کہ سند ہے۔
 مورخہ: 20/4/16
 دن 16/4/16 سال 1437

City: Mirpur
 District: Muzaffargarh
 1st Justice
 20/4/16

نوٹ: وکالت نامہ کی فوٹو کاپی قابل قبول نہ ہوگی

Acceptance

Haider Khan
 Advocate High Court
 Haider Khan Advocate High Court