

03.02.2022

The Tribunal is non-functional, therefore, the case is adjourned to 11.04.2022 before S.B for the same.

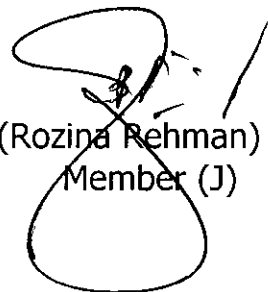
  
Reader

11.04.2021

Appellant present through counsel. Preliminary arguments heard. Record perused.

Points raised need consideration. Instant appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notice be issued to respondents for submission of written reply/comments. To come up for reply/comments on 15.06.2022 before S.B.

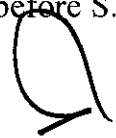
*Ps-Sec/-*  
*A. H. M. / 13/4/22*

  
(Rozina Rehman)  
Member (J)

15<sup>th</sup> June 2022

Counsel for the Appellant present. Mr. Kabeer Ullah Khattak, Addl. AG alongwith Hamid Saleem (Law Officer) for the respondents present.

Respondent No.03 has submitted written reply/comments while respondents No.01 & 02 have not submitted written reply/comments. Learned AAG seeks further time to furnish reply/comments. Last chance is given. To come up for written reply/comments on 04.08.2022 before S.B.

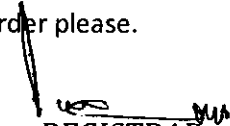

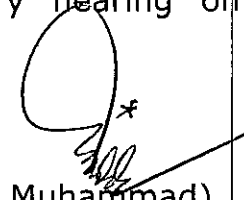
  
(Kalim Arshad Khan)  
Chairman

Form- A

FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No.- 7551 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	06/10/2021	<p>The appeal of Mr. Iftikhar Ali presented today by Mr. Noor Muhammad Khattak Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	10.12.2021	<p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put up there on <u>10/32/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> <p>Junior of learned counsel for the appellant stated at the bar that senior counsel is busy in Peshawar High Court, Peshawar and is not in a position to attend the Service Tribunal today. To come up for preliminary hearing on 03.02.2022 before the S.B.</p> <p style="text-align: right;"> (Mian Muhammad) Member (E)</p>

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

SERVICE APPEAL NO. 7551 /2021

IIFTIKHAR ALI

V/S

EDUCATION DEPTT:

**INDEX**

S.NO	DOCUMENTS	ANNEXURE	PAGE
1	Memo of appeal	.....	1 - 3
2	Affidavit	.....	4
3	Advertisement	A	5 - 9
4	Education testimonials	B	10 - 32
5	Notification dt: 05.03.2012	C	33 - 34
6	Order dt: 07.03.2012	D	35
7	Impugned notification dt: 11.06.2021	E	36
8	Departmental appeal	F	37 - 38
9	Wakalat Nama	.....	39

Dated:      10.2021

**APPELLANT**

Through:

**NOOR MOHAMMAD KHATTAK**  
**ADVOCATE**

FLATE NO. 04, 2<sup>ND</sup> FLOOR,  
JUMA KHAN PLAZA, NEAR FATA SECRETARIAT,  
WARSAK ROAD, PESHAWAR

**0345-9383141**

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

APPEAL NO. \_\_\_\_\_/2021

Mr. Iftikhar Ali, SST (BPS-16),  
GMS Jan Noor, District Bannu.

..... **APPELLANT**

**VERSUS**

- 1- The Secretary E&SE Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director E&SE Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The Chairman Khyber Pakhtunkhwa Public Service Commission, Fort Road, Peshawar.

..... **RESPONDENTS**

**SERVICE APPEAL UNDER SECTION-4 OF THE SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED NOTIFICATION DATED 11-06-2021 WHEREBY THE APPOINTMENT NOTIFICATION DATED 05-03-2012 HAS BEEN DISOWNED AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS**

**PRAYER:**

That on acceptance of this appeal the impugned Notification dated 11.6.2021 may very kindly be set aside and the appellant may kindly be re-instated into service with all back benefits. Any other remedy which this august Tribunal deems fit that may also be awarded in favour of the appellant.

**R.SHEWETH:**

**ON FACTS:**

- 1- That the Khyber Pakhtunkhwa Public Service Commission advertised various posts including the post of SST (G) (BPS-16), the appellant having the requisite qualification applied for the said post and resultantly recommended by the KP public Service Commission. Copies of the advertisement and Educational testimonials are attached as annexure ..... **A and B.**
- 2- That in light of the ibid recommendation the respondents appointed the appellant as Secondary School Teacher (BPS-16) vide Notification dated 5-3-2012. That in response the appellant got himself medically examined and also submitted

arrival report. That where after the appellant was adjusted at GMS Injani, District Orakzai vide Notification dated 7.03.2012 and in response the appellant started performing his duty at the concerned station quite efficiently and up to the entire satisfaction of his superiors. Copies of the Notification and order are attached as annexure....**C & D.**

- 3- That after proper verification of Educational antecedents and service documents the salary of the appellant has been released/started by the concerned authorities. That it is pertinent to mention that during the said period the appellant has successfully completed his probationary period and as such the Department confirmed the appellant against the post of SST (BPS-16).
- 4- That unfortunately during service vide impugned Notification dated 11.6.2021 the appointment Notification dated 5-03-2012 of the appellant has been disowned by the respondents without any reason and clear justification. Copy of the impugned Notification is attached as annexure ..... **E.**
- 5- That feeling aggrieved the appellant filed Departmental appeal but no reply has been received so far. Hence the instant appeal on the following grounds amongst the others. Copy of the Departmental appeal is attached as annexure ..... **F.**

**GROUND:**

- A- That the impugned order dated 11.6.2021 is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.
- B- That the appellant has not been treated by the concerned authority in accordance with law and rules and as such the authority violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That the impugned Notification dated 11.6.2021 has been issued by the concerned authority in violation of the Principle of locus Poenitentiae.
- D- That no charge sheet and statement of allegation has been issued by the concerned authority before issuing the impugned Notification dated 11.6.2021.
- E- That no show cause notice has been issued to appellant before issuing the impugned Notification dated 25.6.2021.

- F- That no chance of personal hearing/defense has been provided to the appellant and as such the appellant has been condemned unheard.
- G- That the concerned authority acted in arbitrary and malafide manner while issuing the impugned Notification dated 11.6.2021.
- H- That the appellant was also assigned seniority in the cadre of SST (BPS-16) and was due for promotion to the next higher scale but unfortunately the authority without any reason & rhyme and without following codal formalities straight away issued the impugned Notifications dated 11.6.2021 whereby the appointment Notification of the appellant dated 5.03.2012 has been disowned by the authority.
- I- That the concerned authority acted in arbitrary and malafide manner while issuing the impugned Notification dated 11.6.2021.
- J- That appellant seeks permission and advance other grounds and proofs at the time of hearing.

It is therefore most humbly prayed that the appeal of the appellant may kindly be accepted as prayed for.

Dated: 30.9.2021

**APPELLANT**

*[Signature]*  
**IFTIKHAR ALI**

**THROUGH:**

*[Signature]*  
**NOOR MOHAMMAD KHATTAK**

*[Signature]*  
**KAMRAN KHAN**

*[Signature]*  
**SAID KHAN**

*[Signature]*  
**UMAR FAROOQ**

*[Signature]*  
**HAIDER ALI**  
**ADVOCATES, PESHAWAR**

4

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

SERVICE APPEAL NO. \_\_\_\_\_/2021

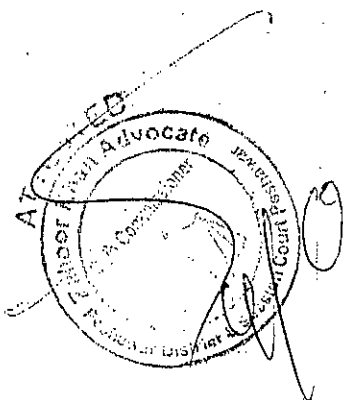
**IFTIKHAR ALI**

**VS**

**EDUCATION DEPTT:**

**AFFIDAVIT**

Stated on oath that the contents of the accompanying service appeal are correct to best of my knowledge and belief and nothing has been concealed from this Honorable Service Tribunal.



  
**DEPONENT**

**CERTIFICATE:**

Certify that no earlier service appeal has been filed by the appellant in the instant matter before this Honorable Service Tribunal.

  
**CERTIFICATION**

# ANNEXURE A

5

## NWFP PUBLIC SERVICE COMMISSION

2- Fort Road Peshawar Cantt.

Website: [www.nwfppsc.gov.pk](http://www.nwfppsc.gov.pk)

Dated: 26-01-2009

### ADVERTISEMENT No. 01/2009.

Applications are invited for the following posts from Pakistani citizens of N.W.F.P./F.A.T.A domicile by 26-02-2009 (13-03-2009 for candidates from abroad). Incomplete applications and applications without supporting documents required to prove the claim of the candidates shall also be rejected without intimation to the candidates.

#### AGRICULTURE LIVESTOCK & CO-OPERATIVE DEPTT.

(S.No. 01) One (01) Post of assistant Botanist. In Livestock Research & Dev. Deptt.

**QUALIFICATION:** M.Sc Agriculture or B.Sc (Hons) Agriculture (Obtained) after "4" Years Instructions after F.Sc) from a recognized University under research programme in the subject relating to the subject groups as specified in schedule -II to which the Vacancy occurs.

**AGE LIMIT:** 21 to 33 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Both Sexes.

**ALLOCATION:** Merit.

(S.No. 02) Two (2) Posts of Research officers Fodder. In L&DD Deptt.

**QUALIFICATION:** M.Sc Agriculture or B.Sc (Hons) Agriculture (Obtained) after "4" Years Instructions after F.Sc) from a recognized University under research programme in the subject relating to the subject groups as specified in schedule -II to which the Vacancy occurs.

**AGE LIMIT:** 21 to 33 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Male.

**ALLOCATION:**

Merit.	Zone-1
01	01

#### CHIEF ENGINEER WORKS & SERVICE DEPARTMENT.

(S.No. 03) Five (05) Posts of Data Entry Operators.

**QUALIFICATION:** (i) 2<sup>nd</sup> Division FA/FSc with one year Diploma in Computer Science from the recognized Institute (ii) Speed of Ten thousand key depression per hour for punching/data entry/verification.

**AGE LIMIT:** 18 to 30 years. **PAY SCALE:** BPS-11. **ELIGIBILITY:** Both Sexes.

**ALLOCATION:**

Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
01	01	01	01	01

ATTESTED

#### DIRECTORATE OF INDUSTRIES, COMMERCE, MINERAL DEV. LABOUR & TECHNICAL EDUCATION DEPARTMENT.

(S.No. 04) One (01) Post of Male-Inspector Mines.

**QUALIFICATION:** (i) Bachelor Degree in Mining Engineering from recognized University and (ii) 1<sup>st</sup> Class Mines Manager's certificate of Competency granted under the provision of Mines Act, 1923 and (iii) Two years experience in Govt. or Semi Government Mining Industries registered under the Mines Act, 1923.

**AGE LIMIT:** 21 to 33 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Male.

**ALLOCATION:**

NOTE: In case of non-availability of candidates possessing the

ATTESTED

ATTESTED



6

provisions of the rules for the time being in force.

**NOTE:** For History-cum-Civics: The candidates must possess Master's Degree either in History or Political Science, provided the other required subjects has studied at B.A. level. The other requirement of teaching degree will, however, remain intact.  
For Biology: 2<sup>nd</sup> Class Master Degree in Botany or Zoology provided that other subject have been studied at graduate level.

**AGE LIMIT:** 25 to 40 years **PAY SCALE:** BPS-17 **ELIGIBILITY:** Female.  
**ALLOCATION:**

S.No	Subject	No. of Posts	Allocation
5	Islamiyat	02	Merit Quota
6	Pak. Study	03	Merit Quota
7	History-Cum-Civics	02	Merit Quota
8	Economics	02	Merit Quota
9	English	02	Merit Quota
10	Statistics	02	Merit Quota
11	Maths	02	Merit Quota
12	Biology	02	Merit Quota
13	Chemistry	02	Merit Quota
14	Physics	02	Merit Quota

(S.No. 52) Sixteen Hundred Eighty One (1681) Posts of Male SETs. /S.S.Ts (Both Science & Arts) (with out graduaty and pension).

**QUALIFICATION:** For Secondary School Teacher (General) (i) B.A. Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

**AGE LIMIT:** 21 to 35 years **PAY SCALE:** BPS-16 **ELIGIBILITY:** Male.

**ALLOCATION:**

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
420	280	281	280	210	210

(S.No. 53) Thirty Four (34) Posts of Male Disabled SETs. /S.S.Ts (Both Science & Arts) (with out graduaty and pension).

**QUALIFICATION:** For Secondary School Teacher (General) (i) B.A. Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

**AGE LIMIT:** 21 to 35 years **PAY SCALE:** BPS-16 **ELIGIBILITY:** Male.

**ALLOCATION:** Merit.

(S.No. 54) Ninety Two (92) Posts of Male SETs. /S.S.Ts For Earth Quake Quota (I.E) Battagram, Mansehra, Shangla, Kohistan, Abbottabad. (Both Science & Arts) (with out graduaty and pension).

**QUALIFICATION:** For Secondary School Teacher (General) (i) B.A. Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

**AGE LIMIT:** 21 to 35 years **PAY SCALE:** BPS-16 **ELIGIBILITY:** Male.

**ALLOCATION:** Merit.

ATTESTED

ATTESTED

ATTESTED

(S.No. 55) Nine Hundred and Seventy Three (973) Posts of Female SETs. /S.S.Ts (Both Science & Arts) (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A. Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc. Second Division with at least Two of the Subjects of Phisic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 40 years. PAY SCALE: BPS-16 ELIGIBILITY: Female.

ALLOCATION:

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
243	162	162	162	122	122

(S.No. 56) Twenty One (21) Posts of Female SETs. /S.S.Ts Disabled (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A. Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc. Second Division with at least Two of the Subjects of Phisic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 40 years. years (10 years age relaxation)

PAY SCALE: BPS-16 ELIGIBILITY: Female.

ALLOCATION: Merit.

(S.No. 57) Fifty One (51) Posts of Female SETs. /S.S.Ts For Earth Quake Quota (I.E) Battagram, Mansehra, Shangla, Kohistan, Abbottabad, (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A. Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc. Second Division with at least Two of the Subjects of Phisic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 40 years. PAY SCALE: BPS-16 ELIGIBILITY: Female.

ALLOCATION: Merit.

TECHNICAL EDUATION AND MAN POWER TRAINING DEPARTMENT.

(S.No. 58) Two (02) Posts of Assistant Professor Commerce in Govt: Colleges of Commercial/Govt: Commercial Training Institutes.

QUALIFICATION: (i) Ph. D in the relevant subject from a recognized University with three year teaching experience in recognized college / Govt: Commercial Institutes/ Govt: Commercial Institutes/ Govt: Commerce College ass Instructor/ Lecturer.

OR (ii) Master's Degree from a recognized University in the relevant subject with Five Years experience of teaching as Lecturer / Junior Instructor in a recognized college/ Govt: Commercial Institute/ Govt: Commerce College.

AGE LIMIT: 25 to 40 years. PAY SCALE: BPS-18. ELIGIBILITY: Male.

ALLOCATION: Merit.

ATTESTED

(S.No. 59) Two (02) Posts of Assistant Professor in Computer Engineering in Govt: College of Technology & Govt: Polytechnic Institute.

QUALIFICATION: (a) Ph. D in Engineering from a recognized University / Institute with one years's teaching/ professional experience in the relevant subject as such OR (b) Master's Degree in Engineering from a recognized University/ Institute with five years teaching/ professional experience in the relevant subject as such: OR (c)

ATTESTED

ATTESTED

8

(S.No. 66)	Ten (10) Posts of Male office Assistant.				
	QUALIFICATION: Bachelor degree from recognized University.				
	AGE LIMIT: 18 to 30 years. PAY SCALE: BPS-14. ELIGIBILITY: Male.				
	ALLOCATION:				
	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
	02	02	02	02	02
(S.No. 67)	One (01) Post of Female office Assistant.				
	QUALIFICATION: Bachelor degree from recognized University.				
	AGE LIMIT: 18 to 30 years. PAY SCALE: BPS-14. ELIGIBILITY: Female.				
	ALLOCATION: Merit.				

**CORRIGENDUM**

1. The Post of Research Officer for Earth Quake Quota appearing at S.No.2 Advt. No.07/2007 may be read as 02 Post for Chemistry and one for cereal Crops.
2. The Post of Reader Advertised in Advt. No. 07/2008 S.No. 39 may be read as one post instead of Two Posts.

**GENERAL CONDITIONS**

- (i) Age, qualification and experience etc shall be reckoned on 26-02-2009 Maximum age limit as prescribed in the recruitment rules shall be relaxed upto 10 years for Govt Servants who have completed 2 years continuous service, upto 10 years for disabled persons and upto 3 years for candidates belonging to backward areas of Zone-1, Zone-3, Merged Areas of Hazara and Mardan Divisions and upper Tannawal, Districts of Swat, Upper Dir, Lower Dir, Chitral, Buner, Kala Dhalak Area, Kohistan District, Shanghar, Gadoon Area in Swabi, Backward areas of Manshara and Batagram, backward areas of Haripur District i.e., Kalanjar Field Kanungo Circle of Tehsil Haripur and Amazai Field Kanungo Circle of Tehsil Ghazi. However, a candidate shall be allowed relaxation in age in one of the above categories provided that the candidates from backward areas, in addition to automatic relaxation of three years shall be entitled to one of the relaxations available to Govt Servants, general or disabled candidates, whichever is relevant and applicable to them.
- (ii) Degrees / Diploma / Experience Certificates / Testimonials of unrecognized Institution are not accepted. Only original Degrees / Certificates are accepted. However, the candidates can apply on provisional certificate signed by the Controller of Examination of the respective Institution but candidates shall produce original degrees / certificates before their selection. Detail Marks Certificate for all the examination shall necessarily be required and these should be attached with the application forms.
- (iii) ALLOCATION of vacancies in BPS-17 and below shall be strictly in accordance with the Zonal ALLOCATION as indicated against each post(s). The applications of the candidates other than the specified zone(s) shall be ignored except for posts reserved for Merit quota. No zonal reservation stands for posts allocated to disabled quota and also for the posts in BPS-18 and above. All such posts shall be filled in on Open Merit.
- (iv) The candidates applying against disabled posts must attach with their application forms of disability certificate from the Provincial Council for Rehabilitation of Disabled Persons as well as disability certificate from the respective Medical Superintendent / Medical Board showing therein the specific disability.

ATTESTED

ATTESTED

ATTESTED

- (v) Ex-armed Forces Personnel must send copy of Discharge Certificate with their applications. Govt. / Semi Govt. / Autonomous / Semi Autonomous Bodies employees may apply direct but their Departmental Permission Certificates should reach within 30 days of the closing date.
- (vi) Applications should be on the prescribed application form obtainable from the listed below branches of the NATIONAL BANK. Application Fee is Rs. 285/- (Rupees Two Hundred Eight Five only) for all the candidates. In addition to the application fee, the candidates will have to pay Rs. 15/- (rupees fifteen only) on account of Bank Charges. Separate application form will be required for each advertised category of posts. Application forms obtained other than the specified branches of the National Bank will be considered invalid and such applications will not be entertained. The applications on plain paper or Photostat shall not be accepted. Incomplete and late applications shall also be ignored.
- (vii) Application must be submitted within time as no extra time is allowed for postal transit. The applications if submitted on the last date for receipt of applications must reach the Commission's office by the closing hours.
- (viii) Applicants married to Foreigners are considered only on production of the Govt. Relaxation Orders.
- (ix) No applicant shall be considered in absentia on paper qualifications unless, he/she possesses exceptionally higher qualifications than the minimum prescribed qualification for a particular post(s).
- (x) Govt reserves the right not to fill any or fill more or less than the advertised post(s).
- (xi) Candidates who have already availed three chances by physical appearance before the Commission and have failed for the post(s) having one and the same qualifications and scale of pay shall be ineligible.
- (xii) Experience wherever prescribed shall be counted after the minimum qualifications for the post(s), if not specifically provided otherwise against the advertised post(s).
- (xiii) In cases where the number of applications received for post(s) are disproportionately higher than the number of available vacancies, shortlisting of the candidates may be done in any one of the following manner:
  - (a) Written Test in the Subject.
  - (b) General Knowledge or Psychological General Ability Test.
  - (c) Academic and / or Professional records as the Commission may decide.

SPECIFIED BRANCHES OF THE NATIONAL BANK OF PAKISTAN.

Main Branches of:

- (i) Parachinar, Mardan, Swabi, Malakand, Shangla, Chitral, Timargara, Daggar, D.I.Khan, Bannu, Karak, Kohat, Hangu, Lakki Marwat, Abbottabad, Haripur, and Manshra.
- (ii) Saddar Road Branch, Tehkal Payan Branch, and G.T Road (Nishtar Abad) Branch Peshawar.
- (iii) Tehsil Bazar Branch Charsadda, Nowshera Cantt: Branch, Bank Square Branch Mingora and city Branch Tanik.

ATTESTED  
*[Signature]*

(Atta Ur Rehman)  
Secretary  
NWFP Public Service Commission  
2- Fort Road Peshawar Cantt: Ph: 9212962

ATTESTED  
*[Signature]*

ATTESTED

ANNEXURE B (10)

# Directorate of Education (FATA)

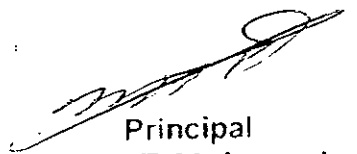


## 15 Days Master Training Workshop of (FATA) Teachers in New English Medium Syllabus for Subjects

IT IS TO CERTIFY THAT

Mr. IFTIKHAR ALI S/O MIR SALAM KHAN  
GHIS/ GHSS G.M.S GUL ZALI BAKKA KHEL FR/B has attended the  
*Master Training Workshop held at Govt College of Education for Elementary Teachers Male*  
*Jamrud, Khyber Agency, w.e.f 06-10-2016 to 15-10-2016 and has qualified to*  
*become a Master Trainer.*

*Resource Person.*

  
Principal  
G.C.E.T (M) Jamrud  
Khyber Agency



11

# Certificate of Participation

This is to certify that

Mr Aftikhar Ali SET GMS Gul Zali Bakka Ichel FR Bannu.

has participated in  
*One-day Training of Presiding Officers and Assistant Presiding Officers - LGE, KPK 2015*  
*Organized by the Election Commission of Pakistan*

Date: 20/5/15

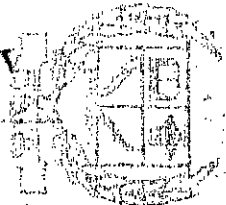
Trainer

Trainer

Syed Sher Afgan  
Additional Secretary  
Election Commission of Pakistan

12

# INSTITUTE OF EDUCATION FAJALPUR



WORKSHOP FOR P.T.T. TEACHERS (FAJALPUR) UNDER (P.C.D.S.P. PROJECT)

SUBJECT: Pat-Studies

Attendance Sheet

PTC/PTT No. ....

Designation: P.T.C./P.T.T.

Name: Mr. Habib Ullah F.R. Bannu

Address: Government College of Education for Elementary Teachers (Male) Habib Ullah F.R. Bannu W. P. from

.....

Signature: Mr. Habib Ullah F.R. Bannu

*(Handwritten signature)*

SIGNATURE  
CLASS TEACHER


*(Handwritten signature)*

*(Handwritten signature)*

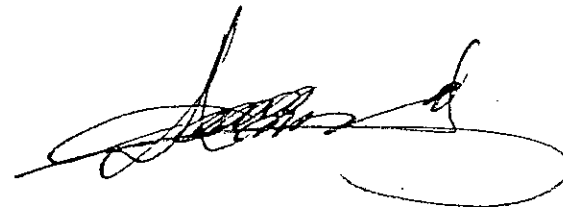
WORKSHOP FOR PTC/PST TEACHERS (FATA) UNDER ( PC DSP PROJECT )  
SUBJECT: ENGLISH

*It is to certify that*

Mr. IFTIKHAR ALI Designation: PTC / PST  
of GPS MUSHRAE NARMI KHEL ER BANNU has  
Successfully completed the training Course of Primary School Teachers held at Govt.  
College of Education for Elementary Teachers ( Male) Habib Ullah F.R. Bannu w.e from  
04/7/2011 to 15/7/2011



PRINCIPAL  
Govt. Elementary School  
Habibullah F.R. Bannu





14

# DIRECTORATE OF EDUCATION FATA

WORKSHOP FOR HEAD TEACHERS (FATA) UNDER ( PC DSP PROJECT )  
SUBJECT: MANAGEMENT

*It is to certify that*

Mr. IFTIKHAR ALI Designation: HEAD TEACHER  
of GPS MUSHARAF NAHMI KHEL FR BANNU has

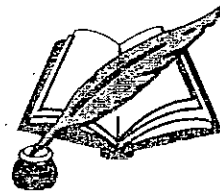
Successfully completed the training Course of Primary School Teachers held at Govt.  
College of Education for Elementary Teachers ( Male) Habib Ullah F.R. Bannu w.e from  
05/05/2011 to 16/05/2011

*[Signature]*  
Principal  
GECT, Kotla Habib Ullah  
F.R. Bannu

*[Signature]*  
Course Co-Ordinator  
(Male) (PC DSP Project)  
Directorate of Education  
FATA

51

GOVERNMENT ELEMENTARY COLLEGE KOTKA HABIB ULLAH FR BANNU



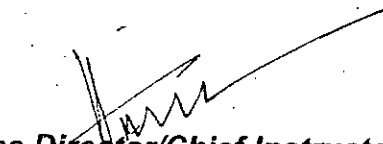
IN-SERVICE PTC REFRESHER COURSE

CERTIFICATE

This is to certify that Mr Ytikhar Ali from Grms Saidgi,

has successfully completed In- Service P.T.C. Refresher course held at Government Elementary

College Kotka Habib Ullah F.R. Bannu w.e.f: 24-6-2006 to 8-7-2006

  
Course Director/Chief Instructor  
Principal,  
GEC Habib Ullah,  
FR Bannu.

16

# DIRECTORATE OF EDUCATION FATA




WORKSHOP FOR INSERVICE P.T.C TEACHERS (FATA) IN THE SUBJECTS OF MATHS, SCIENCE/ ENGLISH  
UNDER ( PC DSP PROJECT )

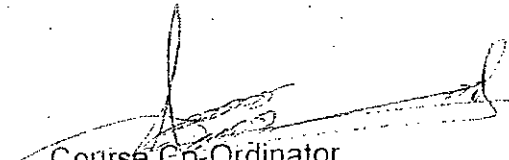
It is to certify that

Mr. **IFTEKHAR ALI** ..... Designation: ..... **P.T.C** .....

of ..... **GPS MUSHARAF F.R BANNU** ..... has

Successfully completed the training Course of Primary School Teachers held at Govt.  
College of Education for Elementary Teachers ( Male) Habib Ullah F.R. Bannu w.e from  
05/01/2011 to 16/01/2011

  
Principal  
GECT Kotka Habib Ullah  
F.R.Bannu

  
Course Co-Ordinator  
(Male) (PC DSP Project)  
Directorate of Education  
FATA

**TRIBAL DOMICILE CERTIFICATE**

17

Certified that Mr. IFTIKHAR ALI  
S/o MIR SALAM KHAN Tribe Ahmadzai  
Section Hathi Khel Sub-Section Eidel Khel  
resident of Laneti Jalander

is a recognized member of Frontier Regions, Bannu, and is entitled to all privileges and concessions admissible to other tribes-men.

He is a bonafied resident of village Laneti Jalander  
He shall bear all losses and benefits of his tribe.

Political Tehsildar / Naib Tehsildar  
Political Naib Tehsildar F.R.S. Bannu.  
Dera Ismael Khan, Bannu.

14/14/98

ATTESTED / VERIFIED

Assistant Political Agent F.R.S. Bannu.



Political Naib Tehsildar  
Dera Ismael Khan, F.R.S. Bannu.

No. 14-14/98

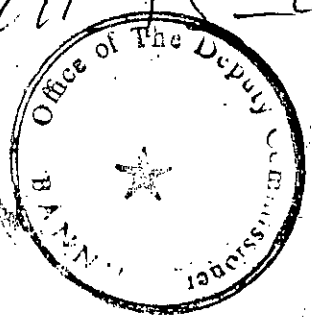
Dated: \_\_\_\_\_

Countersigned.

Political Agent, F.R.S. Bannu  
Dera Ismael Khan, Bannu.

SEAL

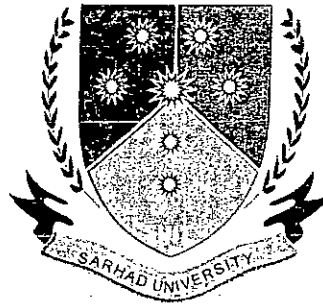
No 665/PC  
dH 15-9-1998



*[Handwritten signature]*

11

Registration No. SUIT-13-02-036-0370



Serial No. 014959

*[Handwritten mark]*

# Sarhad University of Science & Information Technology

This is to certify that Iftikhar Ali son/daughter of Mir Sallam Khan

Having passed the requisite examination, is hereby awarded the degree of

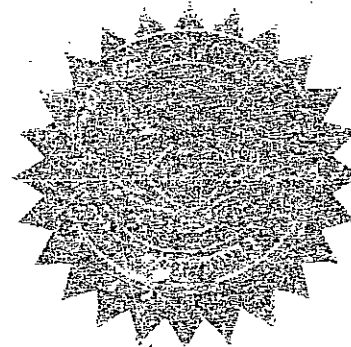
**Master of Education**

With all the rights and privileges appertaining thereto.

Given at Peshawar (PAKISTAN) on the Tenth Day of January Two Thousand Fifteen.

*[Handwritten signature]*  
Registrar

*[Handwritten signature]*  
Vice Chancellor



*[Handwritten signature]*  
President



# SARHAD UNIVERSITY

OF SCIENCE & INFORMATION TECHNOLOGY, PESHAWAR

## TRANSCRIPT

20

Transcript No. SU/ 30530

Name: Iftikhar Ali

Reg. No: SUIT-13-02-036-0370

Father's Name: Mir Sallam Khan

Roll No: 13-SP-75001

Degree: Master of Education

Enrollment Date: 25 Feb, 2013

Faculty: Arts, Social Sciences and Education


Completion Date: 10 Dec, 2014

1st Semester (Spring - 2013)			Cr Hrs	Marks	Grade	GPs	Remarks
SME	626	Comparative Education	3 - 0	73	B	9	
SME	627	Computers in Education	3 - 0	60	C	6	
SME	628	Educational Research	3 - 0	57	D+	4.5	
SME	629	Advance Educational Psychology	3 - 0	60	C	6	
SME	630	Guidance and Counselling	3 - 0	66	C+	7.5	
Cum Cr: 15.0 GPA: 2.200 Cum GPA: 2.20 Status: PTD							

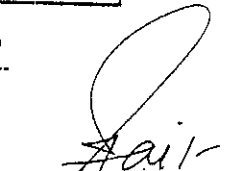
2nd Semester (Spring - 2014)			Cr Hrs	Marks	Grade	GPs	Remarks
RES	381	Qualitative Research Methods	3 - 0	69	C+	7.5	
RES	382	Quantitative Research Methods	3 - 0	78	B+	10.5	
SME	631	Educational Management and Supervision	3 - 0	64	C	6	
SME	632	Education in Pakistan: Problems issues & Trends	3 - 0	84	B+	10.5	Reappeared
SME	633	Curriculum Development and Implementation	3 - 0	73	B	9	Reappeared
SME	635	Teacher Education in Pakistan	3 - 0	69	C+	7.5	
SME	638	Higher Education	3 - 0	67	C+	7.5	
Cum Cr: 36.0 GPA: 2.786 Cum GPA: 2.54 Status: QFD							

Marks Obtained : 820 Total Marks : 1200 Overall Percentage : 68.33%

(Errors and omissions are subject to subsequent rectification)  
----- END OF TRANSCRIPT -----

  
Dean

(Degree Completed)

  
Controller of Examinations

Errors and omissions are subject to subsequent rectification



Serial No. GU 00376  
2

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

22

C

# GOMAL UNIVERSITY

## DERA ISMAIL KHAN

(N.W.F.P.) PAKISTAN



(Session 1996-97)

IFTIKHAR ALI.

SON of MIR. SALAM KHAN

and a student of the Institute of Education and Research,  
Gomal University having passed the prescribed examination  
in JUNE/JULY. 1996

is this day admitted by the Gomal University to the DEGREE of

## BACHELOR OF EDUCATION

in the SECOND Division in part I (Theory)

in the FIRST Division in part II (Skill in Teaching) and

in the SECOND Division in Aggregate.

The Examination was taken as a whole/~~in parts~~.

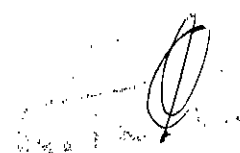
Registered No. 2695-PBS-95

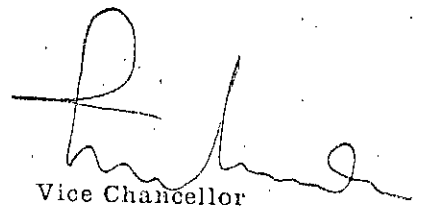
Roll No. 1617

NOVEMBER 8. 1996

Countersigned

  
Controller of Examinations



  
Vice Chancellor

GOMAL UNIVERSITY



DERA ISMAIL KHAN

Passed/Re-appear/Failed in Agg

DETAILED MARKS CERTIFICATE 8-96-97

B.Ed Examination 19 Annual / Supplementary / 2nd Term.

Roll No. 1617 Held in Term / Aug 97

Mr / Miss Iftikhar Ali

The candidate secured the following marks & has been placed in Second Division.

SUBJECTS	Total Number of Marks allotted	MARKS OBTAINED	
		In figures	In words
1. Sec. org & Mgt	100	47	Forty Seven
2. Curri. and Inst.	100	42	Forty Two
3. Measurement & Eval	100	44	Forty Four
4. Project	100	80	Eighty only
5. Agg of 1st term	400	168	one hundred and sixty eight
6. Ps. Skill in teaching	200	142	one hundred and forty two
	/	/	
<b>TOTAL</b>	1000	523	Five hundred and twenty three

Nº 029177

Dated 2-11-1997

Controller of Examinations, Gomal University, Dera Ismail Khan.

*Iftikhar Ali*

*[Signature]*



# SCHOOLS & LITERACY DEPARTMENT, NWFP, PESHAWAR

C  
T

Serial No..... 1112

Session..... 2007

Roll No..... 1055

Marks Obtained..... 674 / 1200

Division..... Ind

Certified that Mr./Mrs./Miss..... Iftikhar Ali

Son/Daughter of..... Mir Salam Khan

is a student of

Private Bannu

having passed the C.T.Examination held in..... August 2007..... is

qualified to teach in Middle/High School of Schools & Literacy Department.

Prepared by.....

Checked by.....

Date of declaration Result..... 15/12/2007

Date of Issue..... 4/1/2011

Deputy Director (Examination)  
Schools & Literacy Department,  
N.W.F.P., Peshawar.

C  
T  
E  
X  
A  
M  
I  
N  
A  
T  
I  
O  
N

24

25

S.No. 14489

Departmental Examinations Schools & Literacy Department, NWFP



NWFP  
DETAILED MARKS CERTIFICATE

Training Classes Examination CT (General)

Name / Iftikhar Ali

Session 2007

Father's Name Mir Salam Khan

Roll No. 1055

Subject	Maximum Marks	Marks obtained		
		Internal	External	In words
1. Theory and History of Education	100			40
2. Child Development	100			54
3. School and Community Development	100			52
4. General Methodology & Preparation of Teaching Aids	100			51
5. Counselling Testing and Evaluation	100			53
6. Organisation of Elementary Education of School Management	100			57
7. English	100			59
8. Science/Maths	100			61
9. Social Studies	100			35
10. Islamiyat	100			50
11. Teaching Practice	200			162
Total	1200			674

Note: Errors/omissions excepted

Failed/Passed Division Passed Division II

Prepared by \_\_\_\_\_

Checked by Department \_\_\_\_\_

Date of Declaration of Result \_\_\_\_\_

[Signature]  
Deputy Director (Examination)  
Schools & Literacy Department,  
N.W.F.P., Peshawar.

[Signature]

Govt. College Of Education For Elementary Teachers (Male)  
Ghoriwala (Bannu)  
Provisional Certificate.

Roll No 952 Admn: No 186/1183 Session 1992-93

This is to Certify that Mr. IFTIKHAR ALI S/o MIR SALAM KHAN  
and a resident of LAKKI MARWAT who appeared from this college

in the PTC Departmental Examination held in 1993  
has according to the result supplied by the Registrar, Departmental  
Examinations, Education Department, N.W.F.P, Peshawar been declared  
successful in the said examination.

Marks Obtained 681 out of 1200 Division II

Note:- This certificate is given only with the object of enabling the student to get  
appointment & is not to be held equivalent to the certificate to be given to him by the  
Registr. Departmental Examinations, Education Department, N.W.F.P, Peshawar

Date of Declaration of Result 25-12-93

Vide R.D.E Peshawar Endst No NIL

Prepared by [Signature] Checked by [Signature]

No NIL Date of Issue 9-1-94

[Signature]  
PRINCIPAL

Govt. College of Education  
For Elementary Teachers (M)  
Ghoriwala (Bannu)

[Signature]

27

# DETAIL MARKS CERTIFICATE.

## TRAINING CLASSES EXAMINATION, P.T.C.

1993

Roll No 952 Name J. Tikhed Ali

Son/Daughter of Mr. Mir. Salam Khan

Serial No.	SUBJECT	Max: Marks.	Marks Obtained	
			In Figures	In Words
1.	Principle of Edu;	100	67	
2.	Edu: Psychology and guidance.	100	47	
3.	School Organization	100	66	
4.	Urdu.	100	68	
5.	Maths.	100	46	
6.	General Science.	100	52	
7.	Social Studies	100	59	
8.	Islamiat	100	63	
9.	Art and Practical art.	100	56	
10.	Health Education.	100	50	
11.	Practice of teaching	200	112	
12.	Pashto	100		
Total :-		1300	681	

Prepared by [Signature]

Division I

Checked by .....

Result declared on 25-12-93

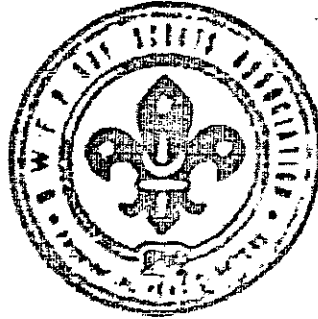
[Signature]

[Signature]  
 Registrar,  
 Departmental Examinations,  
 Education Department,  
 N.-W.F.P., Peshawar.

# N.W.F.P. BOY SCOUTS ASSOCIATION

## BASIC UNIT LEADER COURSE

28



THIS IS TO CERTIFY THAT MR. ISTEHAR ALI.....  
SON OF MR. SALIM KHAN OF *Govt. High School Wala*  
HAS ATTENDED THE BASIC UNIT LEADER TRAINING COURSE *Bannu*

### SHAHEEN SCOUT SECTION

HELD AT TAKYA CAMP, ABBOTTABAD/JUNGLE MANGLE,

MANSEHRA/GOVT ELEMENTRY COLLEGE: KABAL SAWAT

FROM.....*29.4.93*.....TO.....*4.5.93*.....(1993)

HE WAS DECLARED SUCCESSFUL.

No. BULC (271) *M.K. SAWAT*

DATED.....*5.5.93*.....

*[Signature]*  
COURSE LEADER

GOMAL UNIVERSITY  
DERA ISMAIL KHAN  
(N.W.F.P) PAKISTAN



(Session 2003 )  
ANNUAL

IFTIKHAR ALI. SON of MIR SALAM KHAN. and  
a student of BANNU, DISTRICT.

having passed the prescribed examination in APRIL 20 04 ,  
is this day admitted by the GOMAL UNIVERSITY to the DEGREE of

**MASTER OF ARTS**

in the SECOND Class

The subject of examination being PASHTO

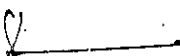
The Examination was taken as a whole/in parts.


Registered No. 295-PBS-95

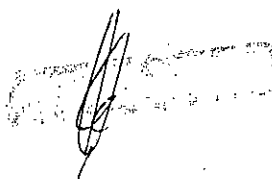
Roll No. 4982

RESULT DECL. ON DECEMBER 24, 20 04

Countersigned

  
Controller of Examinations

  
Vice-Chancellor



30

**GOMAL UNIVERSITY**



**DERA ISMAIL KHAN**

Passed/Re-appear/Failed in Agg:

**DETAILED MARKS CERTIFICATE**

1st/2nd/3rd/4th/5th/6th/7th/8th/9th/10th Examination 20 05 (Annual/Supplementary/ Term.)

Roll No. 4902

Mr./Miss. M. H. Khan ALI

The Candidate secured the following marks & has been placed in II Division.

SUBJECTS	Total No. of Marks Allotted	MARKS OBTAINED	
		In Figures	In Words
1. Detail Study / 100	100	42	Forty two
2. Nat. 100	100	32	thirty two
3. Essay / 100	100	60	Sixty
4. GP / 100	100	54	Fifty four
5. ... / 100	100	60	Sixty
Agg. of 500	500	248	Two Hundred & Forty eight
<b>TOTAL</b>	<b>500</b>	<b>248</b>	<b>Two Hundred &amp; Forty eight</b>

THE EXAMINATION WAS TAKEN AS A WHOLE / IN PARTS.

**Nº 078237**

Date 24/12/04

*M. H. Khan*  
Controller of Examinations  
Gomal University, D.I. Khan.

*[Signature]*

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

# GOMAL UNIVERSITY

## DERA ISMAIL KHAN

(N.W.F.P) PAKISTAN



(Session 1997-1998) ANNUAL

IFTIKHAR ALI

SON of

IRDALLAM KHAN and

a student of

BANNUA DISTRICT

having passed the prescribed examination in

SEPT/OCTOBER, 1997

is this day admitted by the GOMAL UNIVERSITY to the DEGREE OF

### BACHELOR OF ARTS

in the SECOND Division

Passed also in

XXX as an

Additional Optional Subject/Pakistan Studies and Islamiyat as Compulsory Subjects

The Examination was taken as a whole in parts

Registered No. 2635-PBS-95

Roll No. 186

JANUARY 20, 19 98

Countersigned

Controller of Examinations

Vice-Chancellor



32

GOMAL UNIVERSITY



DERA ISMAIL KHAN

Passed/Re-appear/  
Failed in Agg/Failed/Absent

DETAILED MARKS CERTIFICATE

B.A. Examination Part - II

SESSION 1997 (Annual)

Roll No. 10869

Mr./Miss Iftikhar Ali

The Candidate secured the following marks & has been placed in Second Division.

SUBJECT	Total No. of Marks Allotted	MARKS OBTAINED	
		in Figures	In Words
1. English	75	25	Twenty five
2. Urdu/Pashto/Arabic/ Persian/English Elective.	75	49	Forty nine
3. Islamic Studies	75	50	Fifty only
4. Political Science	75		
5. History	75		
6. Economics	75		
7. Pre-Law	75		
8. Statistics	75		
9. Geography	75		
10. H.P.E.	75		
11. Pak: Stud (Comp)	40	16	Sixteen
12. Computer Science	75		
13. Aggregate of Part I	285	153	one fifty three
<b>TOTAL</b>	<b>550</b>	<b>293</b>	<b>Two hundred ninety three</b>

THE EXAMINATION WAS TAKEN AS A WHOLE/IN PARTS.

No 0010658

Date 20 JAN 1998 19

Controller of Examinations  
Gomal University, D.I.Khan.

*[Handwritten signature]*

# ANNEXURE C

BETTER COPY

33

Directorate of Elementary and Secondary Education

Khyber Pakhtunkhwa Peshawar

PH No. 091-9210389, 9210938

9210137, 9210937, 9210168

Fax: 091-9210936

E-mail: [desekpk@yahoo.com](mailto:desekpk@yahoo.com)

## Notification.

Consequent upon the recommendation of the Khyber Pakhtunkhwa Public Service Commission, appointment of the following candidates is hereby ordered against the post of Secondary School Teacher (SST Gen.) in BPS-16 (Rs. 10000-800-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with immediate effect and further his services placed at the disposal of Director of Education FATA for further posting against vacant SST General posts:-

S#	Name	Father name	Domicile	Zone	Permanent address	Place of posting
1	Mikhar Ali	Mir Salam Khan	FR Bannu	I	Vill: Hali Khail P.O. Londi Jalandar FR Bannu	Services placed at the disposal of Director of Education FATA for further posting against vacant SST General posts.
2	Abdul Baseer	Gulshan Khan	FR DI Khan	I	VPO Darazenda FR DI Khan	---do---
3	Muhammad Farooq	Muhammad Yousaf	Mohmand Agency	I	Moh: Bickel Gunj P.O & Dist: Mardan.	---do---
4	Abdul Malik	Said Muhammad Shah	Mohmand Agency	I	FPO Lannan Parang Ghar Mohmand Agency.	---do---
5	Yar Khan	Ali Rahman	Mohmand Agency	I	Vill: Malti Suran Dara P.O Lakari Mohmand Agency.	---do---
6	Zafar Iqbal	Gul Rahman	Mohmand Agency	I	FPO Ganjai, Tehsil Takhl Bhai Dist: Mardan.	---do---

### Terms and conditions:-

1. His services will be considered regular but without pension & Gratuity in terms of section 19 of the NWFP Civil Servant Act, 1973 as amended vide NWFP Civil Servants (Amendment) Act, 2005. He will however be entitled to Contributory provident fund in such a manner and at such rates as per prescribed by the Govt.
2. In case he is already in Government Service and working against pensionable post on regular basis before 1<sup>st</sup> day of July 2001, without any service break, on application to Khyber Pakhtunkhwa Public Service Commission through proper channel and selection by the commission, is appointed and allowed choice of option either to retain benefit of pension & gratuity as allowed to him under his previous terms of appointment or to avail the benefit of contributory provident fund allowed to him under new appointment.
3. His services are liable to termination on one month's notice from either side. In case of resignation without notice his one-month pay/allowances shall be forfeited to the Government.

ATTESTED

ATTESTED

ATTESTED

Directorate of Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

PH No. 091-9210389, 9210938,  
9210437, 9210957, 9210468  
Fax 091-9210936  
E-mail [desekpk@yahoo.com](mailto:desekpk@yahoo.com)

### Notification

Consequent upon the recommendation of the Khyber Pakhtunkhwa Public Service Commission, appointment of the following candidates is hereby ordered against the post of Secondary School Teacher (SST Gen) in BPS-16 (Rs.10000-800-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with immediate effect and further his services placed at the disposal of Director of Education FATA for further posting against vacant SST General posts:-

SNO	Name	Father Name	Domicile	Zone	Permanent Address	Place of Posting
1	2	3	4	5	6	7
1	Prince Ali	Mir Salam Khan	FR Bannu	1	Vill: Flati Khail P.O Landi Jalandar FR Bannu	Services placed at the disposal of Director of Education FATA for further posting against vacant SST Gen posts.
2	Abdul Baseer	Gulshan Khan	FR D.I. Khan	1	P.O Darazenda FR D.I. Khan	-Do-
3	Muhammad Farooq	Muhammad Yousof	Mohmand Agency	1	Moh: Bicket Gunj P.O & Dist: Mardan	-Do-
4	Abdul Malik	Said Muhammad Shah	Mohmand Agency	1	P.O Laman Parang (Ghar Mohmand Agency)	-Do-
5	Yar Khan	Ali Rahman	Mohmand Agency	1	Vill: Matti Suran Dara P.O Lukari Mohmand Agency	-Do-
6	Zafar Iqbal	Gul Rahman	Mohmand Agency	1	P.O Ganjai, Tehsil Takht Bhai Dist: Mardan	-Do-

#### Terms and conditions:-

1. His services will be considered regular but without pension & Gratuity in terms of section 19 of the NWFP Civil Servant Act, 1973 as amended vide NWFP Civil Servants (Amendment) Act, 2002. He will however be entitled to Contributory provident fund in such a manner and at such rates as per prescribed by the Govt.
2. In case, he is already in Government service and working against pensionable post on regular basis before 1<sup>st</sup> day of July 2001, without any service break, an application to Khyber Pakhtunkhwa Public Service Commission through proper channel and selection by the commission, is appointed and allowed choice of option either to retain benefit of pension & gratuity as allowed to him under his previous terms of appointment or to avail the benefit of contributory provident fund allowed to him under new appointment.
3. His services are liable to termination on one months notice from either side. In case of resignation with out notice his one-month pay/allowances shall be forfeited to the Government.

ATTESTED

ATTESTED

ATTESTED

34

BETTER COPY

4. He should join his post within 30 days of the issuance of this notification. In case of failure to join there post within one month of issuance of this notification his appointment will expire automatically and no subsequent appeal etc. shall be entertained.
5. He would be on probation for a period of one year extendable for another one year.
6. He will be governed by such rules and regulations as may be issued from time to time by the Govt.
7. His Services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be proceeded under the rules framed from time to time.
8. Charge report should be submitted to all concerned.
9. The Director of Education FATA concerned would furnish a certificate to the effect that the candidate has joined the post or otherwise after one month of the issue of his posting orders.
10. The Director of Education FATA concerned will verify their documents before release of pay.
11. His seniority will be maintained as determined by the Khyber Pakhtunkhwa Public Service Commission.
12. No TA/DA will be allowed to the appointee for joining his duty.

(Muhammad Rafiq Khalak)  
Director  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar.

Endst: No.955-59/File.No.2/A-14/SST(F)/PSC/Apptt: Dated Peshawar 05/03/2012

Copy forwarded for information and necessary to action to the:

1. Accountant General Khyber Pakhtunkhwa Public Service Commission Peshawar.
2. Secretary Khyber Pakhtunkhwa Public Service Commission Peshawar.
3. Director of Education FATA Warsak Road, Peshawar.
4. All Agency Accounts Officer in FATA.
5. Official concerned.
6. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
7. PA to the Director E&SE Khyber Pakhtunkhwa Peshawar.
8. M/File.

SD/-  
Dy: Director (Estab:)  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar.

ATTESTED

ATTESTED

ATTESTED

4. He should join his post within 30 days of the issuance of this notification. In case of failure to join there post within one month of issuance of this notification his appointment will expire automatically and no subsequent appeal etc shall be entertained.
5. He would be on probation for a period of one year extendable for another one year.
6. He will be governed by such rules and regulations as may be issued from time to time by the Govt.
7. His Services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be proceeded under the rules framed from time to time.
8. Charge report should be submitted to all concerned
9. The Director of Education FATA concerned would furnish a certificate to the effect that the candidate has joined the post or otherwise after one month of the issue of his posting orders.
10. The Director of Education FATA concerned will verify their documents before release of pay.
11. His seniority will be maintained as determined by the Khyber Pakhtunkhwa Public Service Commission.
12. No TADA will be allowed to the appointee for joining his duty.

( Muhammad Rafiq Khattak )  
 Director  
 Elementary and Secondary Education  
 Khyber Pakhtunkhwa Peshawar.

Endst: No. 755-59 File No. ZA-1-I/SST(I)/PSC/Apptt: Dated Peshawar 05/03/2012

- Copy forwarded for information and necessary action to the:-
1. Accountant General Khyber Pakhtunkhwa Peshawar.
  2. Secretary Khyber Pakhtunkhwa Public Service Commission Peshawar.
  3. Director of Education FATA Warsak Road Peshawar.
  4. All Agency Accounts Officer in FATA.
  5. Official Concerned
  6. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
  7. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
  8. M/F File

ATTESTED

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

05/3/2012

ATTESTED

ATTESTED



ADJUSTMENT

ANNEXURE ..D

Consequent upon their appointment as SST in BPS-16 on the basis of recommendation of Khyber Pakhtunkhwa Public Service Commission and placement of their services at the disposal of Director Education, FATA vide Director, Elementary & Secondary Education Khyber Pakhtunkhwa's Notification No. 955-59/File No.2/A-14/SST(F)/PSC/Apptt: dated 5-3-2012, the following SSTs are hereby adjusted in the schools noted against each with immediate effect:-

S/#	Name/Father's Name/Domicile/Address	Posted at	Remarks
1	Ifthikhar Ali S/O Mir Salam Khan(FR Bannu). Vill: Hati Khail PO: Landi Jalandar F.R Bannu	GMS Injani, Orakzai Agency	Against vacant post
2	Abdul Baseer S/O Gulshan Khan(FR D.I.K). V/PO: Darazinda, FR D.I. Khan	GMS Abdur Razaq Koroona F.R D.I. Khan	-do-
3	Muhammad Farooq S/O Muhammad Yousaf (Mohmand) Moh: Bicket Gunj PO: & Distt: Mardan	GMS Alingar Mohmand Agency	-do-
4	Abdul Malik S/O Said Muhammad Shah(Mohmand) V/PO: Laman Parang Ghar, Mohmand Agency	GMS Jammu F.R Kohat	-do-
5	Yar Khan S/O Ali Rahman (Mohmand) Vill: Matti Suran. Dara PO: Lakarai, Mohmand Agency	GMS Bahadur Killi, Mohmand Agency	-do-
6	Zafar Iqbal S/O Gul Rahman(Mohmand) V/PO: Tehsil Takht Bhai Distt: Mardan	GMS Abdul Kore, Mohmand Agency	-do-

Note:-

The terms & conditions of their posting will be the same as already prescribed in the above mentioned Notification of Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.

(FAZLI MANAN)  
DIRECTOR EDUCATION (FATA)

Endst: No. 3187-3200 /A-1/ Apptt: of SST (Gen)(PSC)2012 Dated Pesh: the 7/3 2012

Copy forwarded to the:-

- 1 Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar w/r to his Notification cited above.
- 2 Agency Education Officers concerned
- 3 Agency/District Accounts Officers concerned
- 4 Principal/Headmasters concerned
- 5 Candidate concerned
- 6 P.A to D.E FATA

ADDL DIRECTOR (ESTAB)



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

**NOTIFICATION**

1. WHERE AS one Mr. Itikhar Ali S/O Mir Salam Khan who appointed himself as SST (G) in GMS Injani District Orakzai, now working at GMS Jun Noor Bakka Khel Sub Division Wazir Bannu vide, Appointment Notification No 955-59/File No. 2/A-14/SST (M)/PSC/Apptt dated 05/03/2012 which was not issued by the Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa, in fake and bogus.
2. And the competent authority has directed the above said accused SST to produce authentic and verified service record from the concerned authorities, but he failed to comply with the legitimate directions of high ups regarding production of requisite authentic documents/record.
3. AND WHEREAS, an inquiry Committee was constituted by the Competent Authority vide Notification No.778 dated 24/4/2021 which has the entire case record and it has been proved that the said appointment order for the aforesaid post advertised by Public Service Commission Khyber Pakhtunkhwa was found out as fake/bogus.
4. AND WHEREAS it has come into the notice of the Competent Authority that Mr. Itikhar Ali S/O Said Mir Salam Khan, has no legal status of the said appointment order.
5. NOW THEREFORE, under the mandatory provision and power conferred under Section-20 & 21 for General clauses Act-1897 as amended in 1956 and in pursuance of the scrutiny of selection/appointment record in r/o the above mentioned SST which was found fake/bogus, thus his appointment Notification No 955-59/File No. 2/A-14/SST(M)/PSC/Apptt dated 05/03/2012 is hereby declared as fake/bogus ab initio and subsequently "disowned" with the direction to District Education Officer (concerned) to recover salaries and other allied benefits drawn by Mr. Itikhar Ali S/O Mir Salam Khan in the best interest of public service.

Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

Endst. No. 955-59-71 Dated 11/07 2021

Copy forwarded with the to the:-

1. Registrar Khyber Pakhtunkhwa Service Tribunal Peshawar
2. District Education Officer Sub Division Wazir Bannu with the direction to take necessary steps for the recovery of outstanding amount against fake/bogus SST concerned.
3. District Education Officer Orakzai
4. District Account Officer Sub Division Wazir Bannu.
5. PS to Secretary Elementary and Secondary Education Khyber Pakhtunkhwa
6. PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa
7. Principal/Head Master concerned.

Deputy Director (Merged District)

To,

The Secretary (E&SE) Department,  
Khyber Pakhtunkhwa, Peshawar.

SUBJECT: DEPARTMENTAL APPEAL AGAINST THE  
IMPUGNED NOTIFICATION DATED 11.6.2021  
WHEREBY APPOINTMENT ORDER OF THE  
APPELLANT HAS BEEN DISOWNED

R.SHEWETH:  
ON FACTS:

- 1- That initially the appellant was inducted/ appointed as primary school teacher vide order dated 5.10.1994. That later on the appellant was appointed through proper channel against the post of Secondary School Teacher (BPS-16) on the proper recommendation of Khyber Pakhtunkhwa Public Service Commission vide Notification dated 5.3.2012. That in response the appellant got himself medically examined and also submitted arrival report. That where after the appellant started performing his duty at the concerned station quite efficiently and up to the entire satisfaction of his superiors.
- 2- That after proper verification of Educational antecedents and service documents the salary of the appellant has been released/started by the concerned authorities. That during service the appellant was transferred from District Orakzai to District Bannu.
- 3- That it is pertinent to mention that appellant is equipped with the qualification of M.A and professional qualification of Master of Education which is over and above the requisite qualification for the post of SST (BPS-16).
- 4- That during service the appellant was issued charge sheet on the allegation that appellant has directly been inducted in the system through fake transfer order to District Bannu. That in response the appellant submitted his reply to the charge sheet and statement of allegation and denied the allegation.
- 5- That where after the appellant was exonerated by the inquiry committee from the charges vide Notification dated 18.8.2016. That it is pertinent to mention that during the said period the appellant has successfully completed his probationary period and as such the Department confirmed the appellant against the post of SST (BPS-16).
- 6- That so much so the appellant was also assigned seniority in the cadre of SST (BPS-16) and was due for promotion to the next higher scale but unfortunately the authority without any reason & rhyme and without following codal formalities straight away issued the impugned Notification dated 11.6.2021 whereby the



appointment Notification of the appellant dated 5.3.2012 has been disowned by the authority.

- 7- That appellant feeling aggrieved filed the instant Departmental appeal on the following grounds amongst the others.

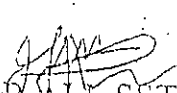
GROUND:

- A- That the impugned order dated 11.6.2021 is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.
- B- That the appellant has not been treated by the concerned authority in accordance with law and rules and as such the authority violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That the impugned Notification dated 11.6.2021 has been issued by the concerned authority in violation of the Principle of locus Poenitentiae.
- D- That no charge sheet and statement of allegation has been issued by the concerned authority before issuing the impugned Notification dated 11.6.2021.
- E- That no show cause notice has been issued to appellant before issuing the impugned Notification dated 6.6.2016.
- F- That no chance of personal hearing/defense has been provided to the appellant and as such the appellant has been condemned unheard.
- G- That the concerned authority acted in arbitrary and malafide manner while issuing the impugned Notification dated 11.6.2021.
- H- That appellant seeks permission and advance other grounds and proofs at the time of hearing.

It is therefore most humbly prayed that on acceptance of this Departmental appeal the impugned Notification dated 11.6.2021 may kindly be set aside and the appellant may be re-instated into service with all back benefits. Any other remedy which your good self deems fit that may also be awarded in favor of the appellant.

DATED: 28.6.2021

APPELLANT

  
IFTIKHAR ALI, SST (BPS-16),  
GMS Jan Noor, District Bannu.

  
2021

39

VAKALATNAMA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR

APPEAL NO \_\_\_\_\_ OF 2021

Abtikhor Ali (APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

VERSUS

Education Deptt. (RESPONDENT)  
(DEFENDANT)

I/We Abtikhor Ali  
Do hereby appoint and constitute **NOOR MUHAMMAD KHATTAK, Advocate, HIGH COURT, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. \_\_\_\_/\_\_\_\_/2021

[Signature]  
CLIENT

ACCEPTED  
NOOR MUHAMMAD KHATTAK  
[Signature]  
SAID KHAN  
&  
[Signature]  
UMAR FAROOQ MOHMAND  
ADVOCATES

**OFFICE:**  
Flat No.4, 2<sup>ND</sup> Floor,  
Juma khan plaza near  
FATA secretariat, warsak road  
Peshawar City.  
Mobile No.0345-9383141

[Signature]  
KAMRAN KHAN  
&  
[Signature]  
HAIDER ALI