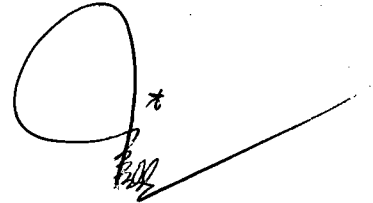


20.04.2022

Counsel for the appellant present.

Learned counsel for the appellant though tried to argue the case but could not make a point pertaining to the connected documents particularly seniority list which is a necessary document for promotion. He therefore, requested for adjournment enabling him to properly assist the court. Adjourned. To come up for preliminary hearing on 06.07.2022 before S.B.



(MIAN MUHAMMAD)
MEMBER(E)

06th July, 2022

Counsel for the appellant present and seeks adjournment. This case be fixed before this Bench or of the bench of Mr. Mian Muhammad, learned Member(Executive). Last chance is given to the learned counsel for the appellant failing which the appeal will be decided on the basis of arguments already advanced and available record. To come up for preliminary hearing on 08.09.2022.






(Kalim Arshad Khan)
Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. - 7794/2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	26/11/2021	<p>The appeal of Mr. Inamullah presented today by Mr. Afrasiab Khan Wazir 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-	8-2-2022	<p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put there on <u>08/02/22</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> <p><i>Due to retirement of hon'ble chairman the case is adjourned to come up for the same as before on 20/04/2022</i></p> <p style="text-align: right;"> Reader.</p>

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

APPEAL NO. 7794 / 2021

INAM ULLAH

VS

EDUCATION DEPTT:

INDEX

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4	Letter dated 10.11.2008, Appointment order dated 16.04.2009, Adjustment order dated 21.04.2009, last pay slip	D & E	18-23
5	Promotion order dated 18.04.2014	F	24
6	Representation dated 26.05.2014, Letter dated 12.06.2014, Working Papers, Promotion order dated 11.12.2014	G, H & I	25-28
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APPELLANT

THROUGH:

**AFRASIAB KHAN WAZIR
ADVOCATE HIGH COURT
CELL NO.03129888752**

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. _____/2021

Mr. Inam Ullah, Senior Theology Teacher (BPS-16)
GHSS Amandi Umer Khan, District Bannu.....**APPELLANT**

VERSUS

- 1- The Secretary Elementary & Secondary Education department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The District Education Officer (Male), District Bannu.
- 4- The District Account Officer, District Bannu.

.....**RESPONDENTS.**

APPEAL UNDER SECTION-4 OF THE SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER DATED 22.12.2020 WHEREBY APPELLANT HAS BEEN GRANTED PROMOTION TO THE POST OF SENIOR TT (BPS-16) WITH IMMEDIATE EFFECT INSTEAD w.e.f 18.04.2014 WHEREBY JUNIOR COLLEAGUE OF THE APPELLANT PROMOTED TO POST OF SENIOR TT (BPS-16) AND AGAINST IMPUGNED APPELLATE ORDER DATED 21.10.2021 WHEREBY DEPARTMENTAL APPEAL OF THE APPELLANT IS REGRETTEED ON NO GOOD GROUNDS.

PRAYER:

That on acceptance of this appeal the impugned orders dated 22.12.2020 & 21.10.2021 may be modified/rectified to the extent of the appellant and the respondents may very kindly be directed to promote the appellant w.e.f 18.04.2014 whereby junior colleague of the appellant was promoted to the post of Senior TT (BPS-16, with all back benefits including seniority. Any other remedy which this August Tribunal deems fit that may also be awarded in favor of the appellant.

R/SHEWETH:

ON FACTS:

Brief facts raising the present appeal are as under:-

- 1- That the appellant was initially appointed as Dinyat Teacher (BPS-06) vide order dated 02.11.2006 Central Prison Haripur i.e Prison

Department, and in this respect inserted entries in the service book of the appellant and appellant after doing his duty for a considerable period the department transferred posted the appellant to Borstal Institute Bannu vide order dated 08.08.2006. Copy of the appointment dated 02.11.2006 and service book & transfer posting orders dated 08.08.2006 are attached as annexure.....**A, B & C.**

2- That the appellant after his transfer posting applied through proper channel to the post of TT (BPS-14) now (BPS-15) in education department and appointed as TT (BPS-14) in the education department vide order dated 16.04.2009, later on the appellant was adjusted at GMS Behram Ch: Mamash Khel District Bannu vide order dated 21.04.2009 and thus issued last pay slip after reliving the Prison department. Copy of the latter dated 10.11.2008, appointment order dated 16.04.2009, adjustment order dated 21.04.2009 last pay slip are attached as annexures.....**D & E.**

3- That appellant embarked on performing his duties as TT (BPS-15) in the education department and in a meanwhile respondent department promoted appellant's junior colleague at Sr.No.2 to the post of Senior TT (BPS-16) leaving the appellant on some wrong pretext being eligible in all aspects for the promotion to the post of STT (BPS-16) vide order dated 18.04.2014. Copy of the promotion order dated 18.04.2014 is attached as annexure.....**F.**

4- That the appellant feeling aggrieved from the promotion order dated 18.04.2014 preferred representation dated 26.05.2014 to Respondent No.2 which is responded with good omen that the appellant name be included in next departmental promotion committee for promotion to the post of Senior TT (BPS-16) vide letter dated 12.06.2014, whereby respondent department submitted working paper for next DPC but sadly to say the respondents hadn't included the appellant name in the next promotion order dated 11.12.2014 and again promoted the appellants junior colleagues at Serial No.4,5 & 6. Copy of the representation dated 26.05.2014, letter dated 12.06.2014 & working papers, and promotion order dated 11.12.2014 are attached as annexure.....**G, H & I.**

5- That the appellant feeling aggrieved from the order dated 11.12.2014 preferred representation to the appellate authority to redress his grievance but respondent No.3 requested Respondent No.2 for guidance as to the seniority of the appellant and misguided the appellate authority through some wrong pretext and thereby correspondence as to the appellant seniority is made including inquiry

by the respondents. Copy of the representation dated 15.12.2014
letter dated 19.01.2015 & inquiry is attached as
annexure.....**J.**

6- That the appellant again moved application to the respondents to
address his grievances i.e promotion to the post of Senior TT (BPS-
16) vide dated 12.08.2015 and respondents vide letter dated
18.08.2015 asked Respondent No.3 to submit comments and
responsibility for ignoring appellant for promotion to the post of
Senior TT (BPS-16) and they submitted report vide letter dated
28.07.2016. Copy of the application dated 12.08.2015, letter dated
18.08.2015, and report dated 28.07.2016 are attached as
annexure.....**K.**

7- That the respondent vide letter dated 28.09.2016 stated that
appellant be allowed seniority from the date of his reliving from jail
department and sent working paper for his promotion to Senior TT if
post available but again on some wrong pretext the respondents
stated that appellant seniority is corrected but he will have to wait for
his turn for promotion to Senior TT (BPS-16) vide letter dated
03.01.2017. Copy of the letter dated 28.09.2016, letter dated
03.01.2017 and seniority list are attached as annexure.....**L & M.**

8- That the appellant after exhausting all the forums, filed Write Petition
No.187-B 2017 before the Peshawar High Court Bannu Bench which
allowed the Writ Petition and converted to appeal and directed the
respondent department to decide the grievances of the appellant one
way or the other and pass speaking order vide judgment dated
19.11.2019. Copy judgment dated 19.11.2019 is attached as
annexure.....**N.**

9- That the respondent issued letter to Respondent No.3 to decide
matter in light of the above-mentioned judgment and issue speaking
order vides latter dated 16.07.2020, In response the respondent
issued impugned promotion order dated 22.12.2020 of the appellant
to the post of Senior TT (BPS-16) with immediate effect instead w.e.f
18.04.2014 whereby his junior had been promoted to the post of
Senior TT (BPS-16) post unjustifiably. Copy of the letter dated
16.07.2020 and impugned promotion order dated 22.12.2020 are
attached as annexure.....**O & P.**

10-That the appellant feeling aggrieved from the impugned promotion
order dated 22.12.2020 preferred departmental appeals to the
appellate authority which has been regretted on no good grounds

vide appellate order dated 21.10.2021. Copy of departmental appeals and appellate order dated 21.10.2021 are attached as annexure.....Q & R.

11-That the appellant further feeling aggrieved and having no other remedy but to file this appeal on the following grounds amongst others.

ON GROUNDS:

- A- That respondents issuance of impugned orders dated 22.12.2020 & 21.10.2021 by granting promotion to the appellant to the post of Senior TT (BPS-16) with immediate not w.e.f 18.04.2014 is against law, facts and norms of natural justice and thus impugned promotion orders dated 22.12.2020 & 21.10.2021 is liable to be modified/rectified to the extent of appellant to grant promotion to the post of Senior TT (BPS-16) w.e.f 18.04.2014.
- B- That the appellant has not been treated by respondents in accordance with law and rules on the subject not above and thus respondents violated article 4 and 25 of the Constitution of the Islamic Republic of Pakistan 1973.
- C- That the respondents acted in arbitrary and malafide manner by not granting promotion to the appellant w.e.f 18.04.2014 whereby his junior Colleague have been promoted to the post of Senior TT (BPS-16) and ignored the appellant on some wrong pretext.
- D- That the respondents acted in discriminatory manner by granting promotion to appellants junior colleagues in the second round of promotion order vide dated 11.12.2014 but appellant has been deliberately ignored by respondents, thus the impugned order dated 22.12.2020 & 21.10.2021 is liable to be modified/rectified to the extent of appellant and to be granted promotion w.e.f 18.04.2014.
- E- That action and inaction of the respondents is against Section-8, 9 of Civil Servant Act, 1973 read with Rule.7, 17 of (Appointment, promotion and transfer) rules 1989, thus impugned order dated 22.12.2020 & 21.10.2021 is liable to be modified/rectified to the extent of appellant and be granted promotion to the post of Senior TT (BPS-16) w.e.f 18.04.2014 instead of with immediate effect.
- F- That the action and inaction of the respondents caused financial loss to the appellant is against Article 38(e) of the Constitution of Islamic republic of Pakistan 1973.

G- That the appellant seeks permission to advance any other grounds at the time of regular hearing inter alia.

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

Dated: 24.11.2021

APPELLANT

Inam Ullah
INAM ULLAH

THROUGH:

Afrasiab Khan Wazir
AFRASIAB KHAN WAZIR
ADVOCATE

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

APPEAL NO. _____/2021

INAM ULLAH

V/S

EDUCATION DEPTT:

AFFIDAVIT

I, **Afrasiab Khan Wazir, Advocate High Court, Peshawar** on the instructions and on behalf of my client, do hereby solemnly and affirmed that the contents of this **Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Tribunal.


**AFRASIAB KHAN WAZIR
ADVOCATE**

Certificate:

It is certified that no earlier appeal has been filed between the parties.


**AFRASIAB KHAN WAZIR
ADVOCATE**



26 NOV 2021

OFFICE OF THE
INSPECTOR GENERAL OF PRISONS,
NWFP, PESHAWAR.

Tele No. 92164270819334

No.

Dated..... 2/11/2006

A-7

To Mr. Inamullah S/O Gul Shah Zada Din,
Village Hinjal Noor Baz, Tehsil and District Barau.

Subject:- APPOINTMENT AS DINYAT TEACHER

Memo: Reference your interview dated 20-9-2006.

The undersigned is pleased to offer you a temporary post of Dinyat Teacher in this Department on pay Rs. 2485/- in the Basic Pay Scale No.(6) viz 2485-125-6235. Your appointment is subject to the following conditions :-

1. Your appointment will take effect from the date you join duty at the office of your posting.
2. Your appointment is purely temporary and your services are liable to be terminated at any time on 15 days notice without assigning any reasons.
3. No TADA will be admissible to you for joining your first appointment.
4. In case you wish to resign at any time you will give two months notice OR in lieu thereof two month's pay will be forfeited from you subject to the discretion of the competent authority in public interest.
5. Your appointment is subject to your Medical fitness for Government Service.
6. You will be eligible for continuance on the post if your work and conduct remained satisfactory during the period of your this temporary appointment provided the vacancy against which you have been appointed continues.
7. Your services will be terminated if your work and conduct is not found satisfactory OR the vacancy ceases to exist.
8. The terms and conditions of your service will be those as laid down in the West Pakistan Government Temporary Employment Rules and Prisons Department Service Rules 1980.
9. You will be liable to serve any where in the jails/lockups of the province of NWFP.
10. For all other purposes such as pay, L.A and Medical Attendance etc; you will be governed by such Rules as may be issued by the Government for the category of Government Servants of the Prisons Department to which you will belong.
11. You will be governed by the West Pakistan Government Servants (Conduct) Rules 1987, the NWFP Civil Servants (Appeal) Rules 1986, the NWFP Civil Servants Act, 1973, the Civil Servants (Appointment, Promotion and Transfer) Rules 1989, NWFP Removal from Service (Special Powers) Ordinance 2000 and all other rules/regulations framed to be framed by the Government from time to time.
12. You shall, for all intents and purposes be Civil Servants, except for the purpose of Pension and Gratuity. In lieu of the same, you shall be entitled to receive Contributory Provident Fund alongwith contribution made by the Provincial Government to your account in the said Fund in the prescribed manner. Provided further that, in the event of death of Civil Servant, whether before or after retirement, your family shall be entitled to receive the said amount. If it has already not been received by concerned deceased civil servant.

M. Inamullah
M. Inamullah
S.O Gul Shah Zada
G. Hinjal Noor Baz, Barau

M. Inamullah
7



OFFICE OF THE
INSPECTOR-GENERAL OF PRISONS,
N.-W.F.P., PESHAWAR.
Tel: 9210937/9210334

8

No. _____

Dated _____

If you accept the appointment on the above cited terms and conditions, you should report to the Superintendent Central Prison Haripur within 10 (ten) days of the receipt of this letter at your own expense. In case you fail to join duty within the same period, the offer of appointment will be treated as cancelled/withdrawn.

[Signature]
INSPECTOR GENERAL OF PRISONS
NWFP PESHAWAR.

ENDST;NO. _____

Copy of the above is forwarded to :-

1. The Superintendent, Central Prison Haripur, for information: On arrival of the above named official an agreement should be taken on stamp paper from him to the effect that he has accepted all terms and conditions contained in the offer of his appointment and submitted to this office for record. Necessary entry of para-12 of terms and conditions may also be made in his Service Book. The Nominal Roll forms should also please be got completed from him and submit to this office which is enclosed herewith.
2. The District Accounts Officer Haripur, for information.

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Sd/-
INSPECTOR GENERAL OF PRISONS,
NWFP, PESHAWAR.

Appoint. Order File

[Signature]
Muhammad Niaz Khan
S.T.T (554-10)
G.H.S Dera Ahmad Khan Harano

Attended
7

1. Name (نام) Haliz INAMULLAH
2. Nationality and Religion (قومیت اور مذہب) (Pakistani) Islam
3. Residence (مستقل رہائش) Hin Jal Noor Bagz Barnd
4. Father's Name and Residence (والد کا نام اور پتہ) Gull Shah Zada DIN
Hin Jal Noor Bagz Barnd
5. Date of birth Christian era as nearly as can be ascertained (تاریخ پیدائش مطابق سن عیسوی) 7-2-1978
6. Exact height by measurement (قد و قامت) "5-5"
7. Personal mark of identification (نشان شناخت) wound scar on left hand

8. Left hand/right hand thumb and finger impressions of (Non-gazetted officer)

"(مرد کی صورت میں بائیں اور عورت کی صورت میں دائیں ہاتھ کی انگلیوں کے نشانات)

Little Finger (چھنگلیا)



Ring Finger (چھنگلیا کے ساتھ کی انگلی)



Middle Finger (انگشت میانیہ)



Fore Finger (انگشت شہادت)



Thumb (انگوٹھا)



9. Signature of Govt. Servant (سرکاری ملازم کے دستخط)

[Handwritten Signature]

[Handwritten Signature]

10. Signature and designation of the Head of the Officer or other Attesting Officer

(تصدیق کنندہ افسر کے دستخط اور مہر)

[Handwritten Signature]
SUPERINTENDENT
CENTRAL JAIL, HARIPUR

Note: The entries in this page should be renewed or re-aggested at least every five years and the signatures in lines 9 and 10 should be dated. Finger prints need not be taken after every 5 hears under this rule.

اس صفحہ کے مندرجہ کم از کم پانچ سال بعد تصدیق ہونا ضروری ہیں اور نمبر 9 اور 10 میں دستخطوں کے نیچے تاریخ لکھنی چاہیے۔
انگلیوں کے نشانات کے لئے ہر پانچ سال کے بعد تصدیق کی ضرورت نہیں۔

8
 nature of
 ernment
 ervant
 دستخط
 سرکاری ملا

9	10	11	12	13	14	15
Signature and designation of the Head of the office or other attesting officer in attestation of column 1 to 8	Date of termination or appointment	Reason of termination (such as promotion transfer, dismissal etc.)	Signature of the head of the officer other Attesting Officer	Nature and duration of leave taken	Allocation of period of leave of average pay up to four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government Period Government to which debitable	Signature of the Head of the office other attesting officer Reference to any recorded punishment of censure, or reward, or praised o the Government servants
دستخط افسر مجاز	تاریخ انتقال ملازمت	وجوہات انتقال ملازمت ترقی جوار پر طر فی	دستخط افسر مجاز	رضت کی نوعیت ومعیار	چار ماہ تک کی رضت کے لئے اوسط تنخواہ کا تین Government to which debtible کون سے	دستخط افسر مجاز سزا یا جزا غیر مناسب کارکردگی کا ریکارڈ
			11/11/2006	EN	Appointed as Dinyal teacher. Religious teacher on temporary basis. He shall be entitled to receive contributory Provident Funds vide J.G. Prisons NWFP Peshawar office order No. 18898-99/WF dated 2/11/06.	
						SUPERINTENDENT CENTRAL JAIL, HARIPUR
						SUPERINTENDENT CENTRAL JAIL, HARIPUR
				472	5.1 pay - before 10/06 made 10/06	
				1/11/12	pay order was 4/11/06 to 30/11/06	
				11-2446	26387	
					17/12	
						Attended

Handwritten initials

Handwritten mark

8 Signature of Government servant	9 Signature and designation of the Head of the office or other attesting officer in attestation of column 1 to 8	10 Date of termination or appointment	11 Reason of termination (such as promotion transfer, dismissal etc.)	12 Signature of the head of the officer or other Attesting Officer	13 Nature and duration of leave taken	13 Allocation of period of leave of average pay up to four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government	14 Signature of the Head of the office or other attesting officer	15 Reference to any recorded punishment of censure, or reward, or praised of the Government servants				
	دستخط افسر مجاز	تاریخ انتظام ملازمت	وجوہات انتقال ملازمت ترقی چادر یا برطرفی	دستخط افسر مجاز	رخصت کی نوعیت و معیار	<p>چار ماہ تک کی رخصت کے لئے اوسط تنخواہ کا تعین</p> <table border="1"> <tr> <th>Period</th> <th>Government to which debitable</th> </tr> <tr> <td>۰۷</td> <td>گورنمنٹ</td> </tr> </table>	Period	Government to which debitable	۰۷	گورنمنٹ	دستخط افسر مجاز	سزا یا جزا یا غیر مناسب کارکردگی کا ریکارڈ
Period	Government to which debitable											
۰۷	گورنمنٹ											
	SUPERINTENDENT CENTRAL JAIL HARIPUR				30/11/07	Service verified upto and from 30/11/07 A.M. from the acquittance roll and observations office record						
					12/07	Granted Advance increment of Rs. 125/- per mising his pay from Rs. 2485/- to Rs. 2610/-						
		31/8/08	Service verified upto 31-08-08 AM from the Acquittance roll & office records	Superintendent Central Prison Haripur								
		31/8/08	Transfer to Barstal Institute Barisal vide G.O. No. NW/P-1001/2008 dt. 8/8/08.									
		Jan-10/24	Deliv 4/1/08	Superintendent Central Prison Haripur								
			Down Net B. 9972/09 pay a Allow for the month of 9 & 10/09.									
				Asst Dist. A/c Officer Bahadur								

1	2	3	4	5	6	7	8	9
Name of Post	Whether Substantive of officiating any whether permanent or temporary	It officiating state. (1) subatative appointment of (ii) whether service counts for pension under rule 3-20 C.S.R. (Pb) Volume ii اگر عارضی ہے تو رول کے مطابق پیش کش کا مستحق ہے؟	Pay in substantive position	Additional pay for officiating	Other emoluments falling under the term pay	Date of appoint. Ment	Signature of government servant	Signature designation the Head office or attesting in attestat column 1
			Rs. Ps.	Rs. Ps.				
درجہ ملازمت	عارضی مستقل قائم مقام				ما سوائے تنخواہ دیگر الاؤنس	تاریخ تقرری	دستخط سرکاری ملازم	دستخط نسر مجاز
T-T Post G.M.S. Behram Chogani Masti Behram			BPS-14		Rs 5300/-	1/12/2009		AN2 DISTRICT Elementary
			Do		Rs 5680/-	1/12/2010		An DISTRICT Elementary
			Do		Rs 9220/-	1/12/2011		An DISTRICT Elementary
			Do		Rs 9830/-	1/12/2011		An DISTRICT Elementary
			Do		Rs 10440/-	1/12/2012		An DISTRICT Elementary
<p>9220/11</p> <p>Office of the Accountant General Khyber Pakhtun Khwa Peshawar.</p> <p>Pay Fixed in the Revised Basic Pay Scales</p> <p>R.B.P.S. B</p> <p>Pay Fixed @ 8000 610 26300</p> <p>R.B.P.S. 9220/-</p> <p>Pay Fixed @ 11700/-</p> <p>Date of Next Increment 1/12/2011</p> <p>Accounts Officer Pay Fixation Party</p>								

8
 Nature of Government Servant
 دستخط سرکاری ملا

9	10	11	12	13	14	15	
Signature and designation of the Head of the office or other attesting officer in attestation of column 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal etc.)	Signature of the head of the office or other Attesting Officer	Nature and duration of leave taken	Allocation of period of leave of average pay up to four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government	Signature of the Head of the office other attesting officer	Reference to any recorded punishment of censure, or reward, or praised or the Government servants
دستخط افسر مجاز	تاریخ انقطاع ملازمت	وجوہات انقطاع ملازمت ترقی جوارد یا برطرفی	دستخط افسر مجاز	رضت کی نوعیت و معیار	چار ماہ تک کی رخصت کے لئے اوسط تنخواہ کا تعین Period Government to which debitable	دستخط افسر مجاز	سزایا جزا یا غیر مناسب کارکردگی کا ریکارڈ
<i>Anzaji</i> DISTRICT OFFICER (MALE) Elementary & Secy: Education BANNU	30/11/2010		<i>Anzaji</i> DISTRICT OFFICER (MALE) Elementary & Secy: Education BANNU		Passed SSC Exam. from BISE Bannu in 1994 Under R.No. 5500 securing 425/850 marks Certificate is verified from the concerned Board vide No 1379/sec: BISE dt 03-06-09.		
<i>Anzaji</i> DISTRICT OFFICER (MALE) Elementary & Secy: Education BANNU	30/6/2011		<i>Anzaji</i> DISTRICT OFFICER (MALE) Elementary & Secy: Education BANNU		Passed FA Exam. from BISE Bannu in 1999 Under R.No. 71349 securing 531/1100 marks Certificate is verified from the concerned Board vide No 1379/sec: BISE dt 03/06/2009.		
<i>Anzaji</i> DISTRICT OFFICER (MALE) Elementary & Secy: Education BANNU	30/11/2012		<i>Anzaji</i> DISTRICT OFFICER (MALE) Elementary & Secy: Education BANNU		Passed BA Exam. from AIOU Islamabad in 2005 Under R.No. L 488527 securing 64% marks, Result declared on 15/08/2006, Degree verified from the concerned University vide No F.15/AEE/4/elt 27/07/09		
					I Islamiyat - 2 - Arabic	<i>Anzaji</i> DISTRICT OFFICER (MALE) Elementary & Secy: Education BANNU	

Anzaji

Anzaji
DISTRICT OFFICER (MALE)
Elementary & Secy: Education
BANNU

9	10	11	12	13	13	14	15
Signature and designation of the Head of the office or other attesting officer in attestation of column 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal etc.)	Signature of the head of the officer other Attesting Officer	Nature and duration of leave taken	Allocation of period of leave of average pay up to four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government	Signature of the Head of the office other attesting officer	Reference to any recorded punishment of censure, or reward, or praised o the Government servants
					چار ماہ تک کی رخصت کے لئے اوسط تنخواہ کا تین Period Government to which debitable عہدہ کو رخصت ہے		سزا یا جزا یا غیر مناسب کارکردگی کا ریکارڈ
دستخط افسر مجاز	تاریخ انقطاع ملازمت	وجوہات انقطاع ملازمت ترقی یا بارے یا برطرفی	دستخط افسر مجاز	رخصت کی نوعیت و معیار	Pass + Shahadat ul Ikhasa Exam. from unofficial "RABIATUL MADARIS", LAHORE in 2008 under R.No=268 receiving 250/600 marks, certificate is verified from the concerned Board vide No dt 09	دستخط افسر مجاز	
			Inc: 30/11/2013 Deputy District Education Officer (Male) Bannu			District Officer (Male) Elementary & Secy. Education BANNU	
						T.No 132 Dated 10-1-13 Drawn Area Pay & Allowances Due to awarded 2-15 w-o-l 2-12-2013 to 31-12-13 Rs 272/- 700. No. 833 dt 7/8/09 Dates of regular pay & allowances 23/4/09 to 30/7/09 Rs 83235/- D.A.C.	
			Deputy District Education Officer (Male) Bannu			Services to be from 23/4/2009 to 30/11/2010 in accordance with the attendance Roll and record of the Office District Officer (Male) Elementary & Secy. Education BANNU	

دستخط سرکاری

Handwritten mark

2/13

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OFFICE OF THE
INSPECTOR-GENERAL OF PRISONS,
N.-W.F.P., PESHAWAR.
Tel: 9210937/9210334

C-17

No. 40/a F 2006/12757

Dated 08-08-2008

ORDER

Dinyat Teacher (BPS-6) Inamullah, attached to Central Prison Haripur is hereby transferred and posted in the same capacity to Borstal Institute Bannu against the vacant post. He should be relieved of his duties immediately by making local arrangements.

NOTE

- i. Arrival and departure reports should be sent to all concerned.
- ii. Minimum joining time may be allowed.

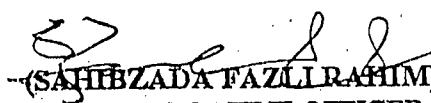
INSPECTOR GENERAL OF PRISONS,
NWFP PESHAWAR

ENDST.NO. 12758-641,

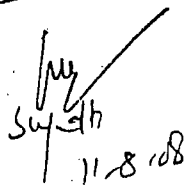
Copy of the above is forwarded to :-

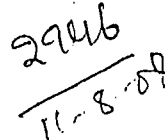
1. The Private Secretary to Minister for Jails NWFP, for information with reference to his letter No.PS/MIN/Prisons/2-2/2008/242 dated 2-8-2008.
2. The Principal, Borstal Institute Bannu, for information.
3. The Superintendent, Central Prison Haripur, for information and necessary action.
4. The Superintendent, Central Prison Bannu, for information and necessary action. The above named official will work at your jail till further orders.
5. The PA to I.G.Prisons NWFP.
6. The District Accounts Officer Haripur.
7. The District Accounts Officer Bannu.

for information.


(SAHIBZADA FAZLURRAHIM)
ADMINISTRATIVE OFFICER
FOR I.G. PRISONS NWFP PESHAWAR

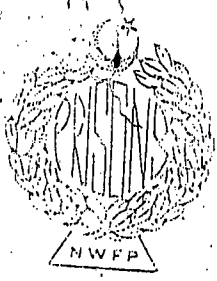

DS/Hc


Sw/SH
11-8-08


2946
11-8-08


Allotted

18



OFFICE OF THE
INSPECTOR-GENERAL OF PRISONS
N.W.F.P., PESHAWAR.
Tel: 9210937/9210334

No. _____
Dated 10-11-2008

To

The Executive District Officer,
School & Literacy Bannu.

Subject:-
Memo;

APPLICATION FORM FOR THE POST OF T.T.

I am directed to forward herewith an application Form (in original) in respect of Mr. Inamullah, Dinyat Teacher attached to Borstal Institution Bannu, for the post of T.T, for information and further necessary action please.

[Signature]
(SAHIBZADA FAZLI RAHIM)
ADMINISTRATIVE OFFICER
FOR I.G. PRISONS NWFP PESHAWAR

ENDST:NO. 17538

Copy of the above is forwarded to the Superintendent Central Prison Bannu, for information with reference to his memo:No.2063/WE dated 26-10-2008.

[Signature]
(SAHIBZADA FAZLI RAHIM)
ADMINISTRATIVE OFFICER
FOR I.G. PRISONS NWFP PESHAWAR

Attested

[Signature]
Head Mistress
GGMS Karim Khan
Bannu

[Signature]
Muhammad Aziz Khan
S.T.T (S.P.2-79)
G.M.S Bannu Ahmad Khan Bannu

[Signature]

① D - 19

Office Of The Executive District Officer Elementary & Secondary Education
Bannu

APPOINTMENT ORDER:

Consequent upon the approval of the competent authority vide No.969/DCO/ Etab-II Dated Bannu 16 - 04 - 2009 and in pursuance of the provisions contained in sub-section(2) of section-19 of the NWFP Civil Servants Act,1973(NWFP Act No.XVIII of 1973), as amended by the NWFP Civil Servants(Amendment) Act,2005(NWFP Act No.IX of 2005) the under signed is pleased to order the appointment of the following TT Male Candidates in BPS-14 plus usual Allowances as admissible under the existing Rules / Policies in the schools noted against each their name with effect from their taking over charge in the interest of public service subject to the Terms and conditions given below:

S.#	NAME	FATHER	ADDRESS	PLACE OF POSTING
1	H. Arifullah	M Zarif Khan	Mandew	GMS Sardad Mandev
2	Shamsherullah Khan	Sher Bahader Khan	Nogarhi Mamash Khel	GHS Dheri Syedan
3	M. Musa Shah	Akhtar Munir Shah	Sadat Hasani Ghafar Shah	GHS Azim Kila
4	Abdullah Shah	Rehmatullah Shah	kotka Qazian Sabo Khel	GMS Dilasa Mandev
5	Nasibullah Khan	Fazal Dayan Khan	Fazal Rahman Mandew	GHS Mandev
6	Saadullah Khan	Falak Niaz Khan	Kot Mehter Ghoriwala	GHS Bharati Michan Khel
7	Nak Dar Khan	Foj Dar Khan	Amandi Sheikh Amir	GHS Ajmal Barlashti
8	Waseefullah Shah	S. Akhtar Ali Shah	Almarkaz Islami Ghoriwala	GMS Nar Jaffer
9	M Usman Khan	M Abdul Kabir Shah	Kot Mehter Ghoriwala	GMS Kot Zafar
10	Hashmat Ali Shah	Syed Kamal Shah	Gul Ahmad Shah Sheikhan	GHS Seru Bada Khel
11	Rahmanullah	Rand Ali Khan	Shabaz Azmat Khel	GHSS Slema Sikander
12	Zakiullah Shah	Muzakir Shah	Hasan Khel Jafar Khan	GHS Hakim Bharat
13	Qismatullah	Muhammad Ghulam	Behram Shah Surani	GMS Domanza
14	Qazi Kifayatullah	Qazi M Ishaq	Zonda Ghaibi Barakzai	GMS Nurar Khas
15	M. Sabil khan	Gul Nawaz Khan	Khujari khass	GMS Luban Khujari
16	Adil Zaman	Shafi Ur Rehman	Pinda Khel Domel	GHS Pinda Khel

[Signature]

S.#	NAME	FATHER	ADDRESS	PLACE OF POSTING
17	Naimatullah Khan	Izzat Khan	Hasan Khel Kheraki	GMS Hasan Khel Kheraki
18	Abdul Wahab	M. Rooshan	Garera Shah Jahan	GMS Dilnawaz Dad Kachkot
19	Hidayatullah	Muhammad Taib	Madrasa Darul Oloom Islamia Hawed	GHS Shukrullah Hussain
20	Fazal Rahim	Rahim Gul	Jhando Khel	GMS Dabak Syed Khel
21	Baseerud Din	Zaheerud Din	Ghoriwala	GHS Kotka Bilawar Khan
22	Abdul Mohalmen	Amir Muhammad	MUSA KHEL WALA KHEL	GMS Hasani Dara Shah
23	Hidayatullah Shah	Abdul Wahab Khan	Mir Mast Ismail Khani	GMS Sadat Hasani
24	Muhammad Nawaz Khan	M Ayaz Khan	Bada Mir Abbas	GHS Bazar Ahmad Khan
25	Inamullah Khan	Gul Shah Zadin	HINJAL NOOR BAZ	GMS Zaman Wazir
26	Azizullah	Noor Ali Jan	Nizam Bazar Boza Khel	GHS Kofi Sadat
27	Rajabullah Khan	Ghula Sohrab	Ghani Michan Khel P/O S.A.Khel	GMS Sada Khel Wazir
28	Israrud Din	Zahirud Din	Ghoriwala	GHS Hukumzad Dardariz
29	Hikmatullah Khan	Habib Rehman	Pir Khel Kakki	GMS Pir Khel Kakki
30	Abdul Haq	Amanullah	Bhangi Khel Surani	GMS Bhangi Khel Surani
31	Khursheed Ahmad	Saeed Zaman	Amandi Sheikh Amir	GHS Ganji Daud Shah
32	Nek Zali Khan	Ghulam Rabi Khan	Hakim Khan Hawed	GMS Khwajamad Landidak
33	Samad Ghafar Khan (DISABLE)	Habib Ghafar Khan	Ismail Khel	GMS Allah Dad Mamash Khel

Note:

- The appointment order of Mr. Sanauliah S/O M. Ayub Khan, Mr. Abdur Razaq S/O Muhammad Saeed, Mr. Imtiaz Khan S/O Azad Khan and Mr. Naimatullah S/O Muhammad Yousuf Khan (Over Age Candidates) will be issued after obtaining Relaxation in upper age limit from a competent authority within 07 days from the date of issuance of this appointment order, failing which next candidates at S.No. 38, 39 and 40 of the Merit List will be appointed instead of them.

TERMS & CONDITIONS :

- They will for all intents and purposes, be Civil Servants except for purposes of pension and gratuity. In lieu of pension and gratuity, they will be entitled to receive such amount contributed by them towards Contributory Provident Fund (C.P.F) along with the contribution made by the Govt: to their account in the said fund in such a manner and at such rates as may be prescribed by the Government.

2. They will be governed by the NWFP Civil Servants Act, 1973, all the laws applicable to the Civil Servants and Rules made there under.
3. Their services will be liable to termination on one month prior notice from either side. In case of resignation without notice their one months pay/ allowances will be forfeited.
4. The Appointees should join their posts within 15 days of the issuance of this order. The Head of the School would furnish a certificate to the effect that the candidate has joined the post or otherwise after, 15 days of the issuance of this order, failing which his appointment order will be treated as cancelled automatically and no subsequent appeal etc shall be entertained.
5. Charge Reports should be submitted to all concerned.
6. The appointees will initially be on probation for a period of two year extendable for another one year.
7. Their services can be terminated at any time in case their / his performance is unsatisfactory during probationary period. In case of misconduct, they will be proceeded against under the NWFP Removal from service (Special Power) Ordinance 2000 and the rules framed from time to time.
8. They will be governed by such Rules and Regulations as may be issued from time to time by the Government.
9. The appointees will have to perform their duties in the school mentioned against their names for a minimum period of Three years and they will not be transferred from the school till the completion of tenure.
10. In case of fake / fabricated certificates / degrees etc, the appointment order of concerned candidates shall stand cancelled and case shall be registered in proper court against him.
11. Their original certificates / degrees should be verified from the concerned Board / University before release of pay.
12. They should produce health and age certificate from Medical Superintendent before taking over charge.
13. No TA / DA is allowed.

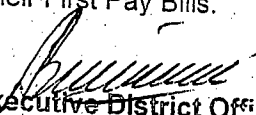
(Bakhtullah Shah)
Executive District Officer
Elementary & Secondary Education
Bannu

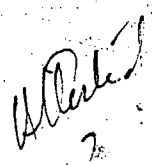
Endst: No. 12411 - 56 AE-III / TT / 2009

Dated 16/04/2009

Copy forwarded to the :-

1. District Nazim, Bannu.
2. District Coordination Officer, Bannu with reference to his approval bearing No. 969/ DCO/ Etab-II Dated Bannu 16 - 04 - 2009.
3. Director E&SE, NWFP, Peshawar.
4. District Accounts Officer, Bannu.
5. Principal / Head Master concerned with the remarks to get proper pay release certificate from the undersigned. They are further directed to deduct One day Pay on account of Education Employees Foundation Fund from the newly appointees in their First Pay Bills.
6. Appointee concerned.
7. Office File.


Executive District Officer
Elementary & Secondary Education
Bannu



OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E&S EDUCATION) BANNU.

APPOINTMENT/ADJUSTMENT ORDER :-

E-22

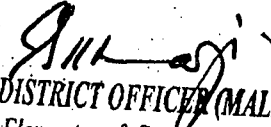
As approved by the Competent authority,
Molvi Inamullah Khan S/o Gul Shahzadin a candidate R/o Hijjal Bannu,
already appointed as a T.T/BPS-14 vide this office order No.12411-56/
ABG(Estt:/AE-III/dated 16/4/2009 at S.No.25 at GMS Zaman Wazir (Bannu
is hereby adjusted at GMS: Ghr Behram Ch:Manash Khel (Distt: Bannu),
against clear vacancy, in the best interest of Public services, from
the date of taking over charges.

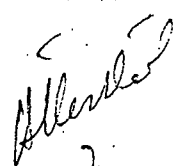
Sd/-
EXECUTIVE DISTT: OFFICER,
(E&S EDUCATION DEPTT:) BANNU

Enst, No. 13012-15/P&T/T.T/2009/ Dated Bannu the 21/4/2009.

Copy forwarded for information :-

- 1- The District Accounts Officer Bannu,
- 2- The District Officer (M) Middle Schools Bannu/Accountant middle
- 3- The Headmaster GMS: Zaman Wazir & Ch:Manash Khel Bannu,
- 4- Mr.Inamullah Khan T.T. Bostal Jail Bannu w/r this application dated 18/4/2009.


DISTRICT OFFICER (MALE)
Elementary & Secy. Education
BANNU



LAST PAY CERTIFICATE

23

P.No - 00339292

1. Last Pay Certificate of MR. Imamullah Hafiz
of the Berstal Institute Bannu.
proceeding to Transfer to Education department Bannu.

2. He has been paid upto 22-4-2009. AN.
as per following rates:—

PARTICULARS:	
Substantive Pay:—	001-Pay — 3780 — 00
Officiating Pay:—	1000 HR — 1029 — 00
Exchange Compensation Allowance:—	1200 MA — 500 — 00
	1872 D.A. — 373 — 00
	TOTAL, 5682 — 00

Pay from 23/4/09 To 30/4/09
8 days deposited with chek
No-14 Dated 25-7-09
(NBP Main Branch)

Deductions:—
C.P.F Rs. 436/2 B.F. Rs. 35/2
Arrears 7/2 G.I. B. 6/2

Berstal Institute opposite

3. He made over charge of the Office of Superintendent-Central Jail Bannu
as Religious Teacher.
on the After noon of 22/4/09.

4. Recoveries are to be made from the pay of the Government servant as detailed on the reverse.

5. He has been paid leave salary as detailed below. Deductions have been made as noted on the reverse.

From _____ to _____ at Rs. _____ a month.
From _____ to _____ at Rs. _____ a month.
From _____ to _____ at Rs. _____ a month.

6. He is entitled to draw the following:—

7. He is also entitled to joining time for _____ days.

8. The details to the Income Tax recovered from him upto the date from the beginning of the current year are noted on the reverse.

Signature [Signature]
Designation DDO
Berstal Institute
Bannu
P.T.O.

Dated at _____ 20

[Signature]

REVERSE

Details of Recoveries

Name of recovery _____

Amount Rs. _____ *Mi* _____

To be recovered in _____

Deductions made from Leave Salary

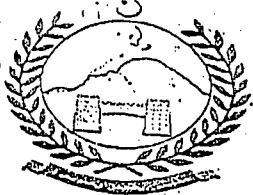
instalments.

From _____ to _____ on account of _____ Rs. _____

From _____ to _____ on account of _____ Rs. _____

From _____ to _____ on account of _____ Rs. _____

Name of months	Pay	Gratuity Fee, etc.	Fund and other deductions	Amount of Income Tax recovered	Remarks
July, 20					
August, 20					
September, 20					
October, 20					
November, 20					
December, 20					
January, 20					
February, 20					
March, 20					
April, 20					



Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

PH No. 091-9210389, 9210938,
9210437, 9210957, 9210468
Fax: 091-9210936, 0800-33857
E-mail rafiq_kk851@yahoo.com

30
5. (3.53)

F-24

Notification

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification NoSO(B&A)/1-18/E&SE/2012 dated 11.07.2012 and Finance Department Endorsement No SO(FR)/FD/10-22(E)/2010 dated 16.07.2012, the following Male TTs B-15 are hereby promoted to the post of Senior TT 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, on the terms and condition given below with immediate effect and further they will be posted in the Government Higher Secondary /High Schools by the District Education Officers concerned against the newly upgraded Senior TT BPS-16 posts:-

Total No. of TT (M) Posts duly verified by the DAO		132
1/3 share of Senior TT Posts		44
Share of promotion 100 %		44
Already Promoted to the post of Senior TT B-16.		38
Post of Senior TT B-16 available for promotion		06
Promoted to the post of Senior TT B-16 in this order		02

S.No	S.No	Name of teacher with Qualif:	Place of posting	D/o Birth	Remarks
1	34	Shad Ayaz TT	GHS Jan Killa	02-04-67	Services placed at the disposal of DEO (M) Bannu for further posting.
2	81	M Musa Shah TT MA	GHSS Comprehensive High School Bannu	02-09-82	-----Do-----

Terms and conditions:-

- 1 They would be on probation for a period of one year extendable for another one year.
- 2 They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 3 Their 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.
- 4 Charge report should be submitted to all concerned.
- 5 Their Inter-Se- seniority on lower post will remain intact.
- 6 No TA/DA is allowed for joining his duty.
- 7 They will give an under taking to be recorded in their service book to the effect that if any over payment is made to him in light this order will be recovered and if he is wrongly promoted he will be reversed.

(Muhammad Rafiq Khattak)

Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

15/0-16
Endst: No. / File No.1/Promotion Senior TT B-16: Dated Peshawar the 18/04/2014.

- Copy forwarded for information and necessary action to the:-
1. Accountant General Khyber Pakhtunkhwa Peshawar.
 2. District Education Officers (M) Bannu.
 3. District Accounts Officer Bannu.
 4. Official Concerned.
 5. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
 6. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
 7. M/File

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

W. H. Khan
7

9-(25)

بخدمت جناب ڈائریکٹر ایلمنٹری اینڈ سیکنڈری ایجوکیشن خیبر پختونخواہ پشاور

عنوان: درخواست برائے ریسنیر ٹی ٹی پروموشن کی نوٹیفیکیشن میں شامل کروانا۔

جناب عالی!

گزارش کی جاتی ہے کہ سائل کی اور بچل سروس بک۔ اے۔ سی۔ اردو غیرہ 17/04/2014 ڈی پی سی میں پیش کی ہے۔ مگر صرف اور بچل ڈاکومنٹس کی وجہ سے کیس ڈیفرفرادی۔

تو سائل نے 21/04/2014 کو بذات خود اور دفتر کراک۔ نے تمام اور بچل کاغذات جناب ڈیٹی صاحب کو پیش کرادی۔ اور اس نے سب کچھ کلنیر کرادی۔

مگر اب نامعلوم وجوہات کی بناء پر میرا نام سنیر ٹی ٹی پروموشن BPS-16 نوٹیفیکیشن سے رہ گیا ہے۔

لہذا اپ صاحب مہربانی فرما کر میرا نام سنیر ٹی ٹی پروموشن نوٹیفیکیشن میں شامل کر کے خدمت کرنے کا موقع عطا فرمائیں۔ تو میں تادم زبیت دعا گو رہوں گا۔

نوٹ: M.A اسلامیات ڈگری، فوٹو سٹیٹس بمع Verified لف ہے۔

العارض

مورخہ۔ 26/04/2014

عین نوازش ہوگی۔

honabab

آپ کا تابع دار مولوی انعام اللہ

معلم اسلامیات

گورنمنٹ ٹیل سکول بہرام چھگرھی ممش خیل ضلع بنوں۔

موبائل نمبر 03469285872

D E, Esj, peshawar

Submitted all documents - 2
applicant - for Justice of a M

26/5/2014

H-(26)

DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION
KHYBER PAKHTUNKHWA.

No. 2737 /F.No. 285/Vol: III/TT/AT/Qari (M)

Dated Peshawar the 12/6 /2014

To,

The District Education Officer (M)
Bannu.

Subject: - APPLICATION FOR PROMOTION TO BPS-16.

Memo:-

I am directed to enclose herewith a copy of the application alongwith its enclosures in respect of Molvi Inamullah TT GMS Behrami Chgarh Khel District Bannu on the subject noted above and to ask to include the name of the above ~~TI~~ teacher in the next Departmental Promotion Committee (DPC) if eligible.

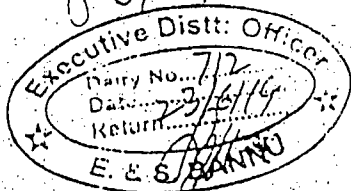
Rab - DED / Peshawar
Pl - Do the work of P.A
7/1/14
Deputy Director (Establishment)
Elementary & Secondary Edu:
Khyber Pakhtunkhwa Peshawar.
12/6/14
6/6/14

Encls: No. 1

Copy forwarded to the:-

- 1. P.A to Director Elementary and Secondary Education Local Office.

Shahgul J/c (ADC(S))



DPEO

Deputy Director (Estab :)
Elementary & Secondary Edu:
Khyber Pakhtunkhwa Peshawar.

Allentia

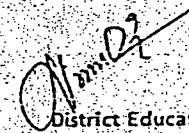
712
9/1/14

Certificate :-

1. It is certified that all the TT (Male) included in the panel for the Promotion of TT-BPS 15 to Senior TT BPS-16

- A). Hold the posts on regular basis and non of them is holding the post on adhoc/ acting charge basis/ contract
- B). Have completed the required minimum length of qualifying service and qualification as required for the promotion of Senior TT B-16 under the rules
- C). None of them is on deputation to any organization under the federal/ provincial / Autonomous/Semi auto (M) Secy: Bannu
- D). Neither any disciplinary /departmental proceeding/Anti Corruption judicial enquiry is pending against them nor has any penalty been imposed upon any one of them during the last five years.
- E). No one is on long leave/Ex-Pakistan Leave.
- F). There ACRs Synopses are free from adverse remarks
- G). There are all alive and serving.
- H). Their appointment order against TT posts are attached herewith.
- I). The Seniority list of BPS-16 officers is final, undisputed and not subjoined.

2. The departmental committee is requested to determine the suitability of the above TT for promotion of TT BPS-15 to Senior TT BPS-16 with immediate effect.



District Education Officer
Male Bannu

District Education Officer
(Male) Bannu

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) BANNU

OFFICE ORDER

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Govt. of Khyber Pakhtunkhwa Elem. & Secy: Edu; Dept: Notification No.3694-3700 / NO SO (B&A) 1-18/E&SE/2012 Dated: 11-07-2012, Finance Deptt Endstr: No SO (FD) 10 22 (E)/2010 Dated 16.07.2012 & Director, Elementary & Secondary Education Khyber Pakhtun Khwa Peshawar Endstr: No 1971-78/ File No 1/Promotion Senior TT B-16 Dated 05-12-2014, the following Male TT B-15 are hereby promoted to the post of Senior TT B-16 (Rs.10000-806-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Govt. for Teaching Cadre on the terms & conditions given below with immediate effect and further posted in the school noted against each.

S.No	Sr No	Name of Official	Present posting as TT B-15	Place of posting as Senior TT B-16	Remarks
1	5	Zakirullah TT	GMS Jahangir Khel	GHS Paimda Khel	Mr. Adil Zaman TT GHS Paimda Khel Adjusted at GMS Jahangir Khel & Post of TT at GHS Paimda Khel up graded to Sr. TT B-16
2	46	Muhammsal Salim TT	GMS Atlas Kha. Beri Khel	GHS Ismaili Mama Khel	Mr. Muhammad Duraz TT GHS Ismaili Mama Khan Adjusted at GMS Atlas Khan Beri Khel & Post of TT at GHS Ismaili Mama Khel up graded to Sr. TT B-16
3	61	Hidayatullah TT	GHS Khujari Babar	GHS Khujari Babar	Adjusted against Senior TT B-16 post. & TT Pos at GHS Khujari Babar Bannu up graded to Sr. TT B-16
4	98/111	Abdul Mohaimin TT	GMS Hussaini Dara Shah	GHS S.K. Bala	Mr. Gul Wali Saah TT GHS S.K. Bala Adjusted at GMS Hussaini Dara Shah & Post of TT at GHS Ismaili Mama Khel up graded to Sr. TT B-16
5	73	Muhammad Nawaz TT	GMS Khawaja Mad Mandan	GHS Shokrullah Mandan	Adjusted against Senior TT B-16 post. & TT Pos at GHS Shokrullah Hussain Mandan Bannu up graded to Sr. TT B-16
6	75	Azizullah TT	GMS Ali Mat Khatikan	GHS Shahbaz Azmat Khel	Mr. Sultan Ali TT GHS Shahbaz Azmat Khel Adjusted at GMS Ali Mat Khatikan & Post of TT at GHS Shahbaz Azmat Khel up graded to Sr. TT B-16

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Terms & Conditions:-

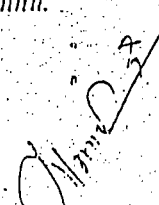
- 1- They would be on probation for a period of one year extendable for another one year.
- 2- They will be governed by such rules and regulations as may be issued from time to time by the Government.
- 3- Their services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct he shall be proceeded under the Rules framed from time to time.
- 4- Charge report should be submitted to all concerned.
- 5- Their Inter-se-seniority on lower post will remain intact.
- 6- No TADA is allowed for joining his duty.
- 7- They will give an undertaking to be recorded in their service book to the effect that if any over payment is made to him in light of this order will be recovered and if he is wrongly promote the will be reversed.

Sd/-

DISTRICT EDUCATION OFFICER
(MALE) BANNU

Encls: No. 15043-59 ZAE-11/11/11 (M) Estab: Dated: 11/12/2014.
Copy for information and N/A to the:-

1. Secretary Elem. & Secy: Edu: Govt. of Khyber Pakhtunkhwa Peshawar.
2. Director Elem. & Secy: Edu: Khyber Pakhtunkhwa Peshawar.
3. District Account Officer Bannu.
4. Accountant Middle (M) Schools Local Office Bannu.
5. The Head of Institution Concerned schools i: Dist: Bannu.
6. Teacher concerned for strict compliance & report.


DISTRICT EDUCATION OFFICER
(MALE) BANNU

Advance Copy

بخدمت جناب ڈائریکٹر صاحب ایڈمیٹنٹری اینڈ سیکنڈری ایجوکیشن خیبر پختونخوا پشاور

Handwritten signature/initials

بوسالیت جناب (M) DEO صاحب ضلع بنوں

عنوان: درخواست برائے پروموشن بحیثیت سینئر ٹی ٹی

Handwritten signature: جناب عالی

Director
Secondary Education
Bannu

(1)۔ پہلی DPC بتاریخ 17/04/2014 سینئر ٹی پروموشن کے لئے اہل: کے باوجود تیسرے محض اسکول ڈیفری کیا گیا کہ میری محض سروس تک تو نہیں ہو چکی۔
لیکن متعلقہ مسئلہ کاغذات موجود نہ تھے۔ جو کہ متعلقہ ٹیکر کے بعد میں پیش بھی کر دیئے۔ سن پروموشن کئی دنوں بعد دوبارہ غور کرنے کی زحمت نہ کرتے تھے یہ سب سروس کے ختم ہونے پر۔
(2)۔ چونکہ سینئر ٹی کی آسامیاں موجود نہیں اس لیے میں نے جناب ڈائریکٹر صاحب سے اپنی ترقی کی شکایات کی (سیری درخواست 26/05/2014) میں نقل لف ہوائے۔
DEO(M) بنوں کو بحوالہ کیجی گئی نمبر 2737/FN285/VOI:III/TT مورخہ 12/06/2014 میرا نام آگئی DPC میں شامل کرنے کی ہدایت فرمائی آگئی تھی۔
مذکورہ نقل لف ہے۔

(3) مذکورہ دوسری DPC کی میٹنگ 10-11-2014 کو ہوئی اور جناب DEO(m) صاحب بنوں نے برائیاں آفس آرڈر نمبر 15043-59/AE-II/TT(M) مورخہ 11-12-2014 چھ اساتذہ کو بحیثیت سینئر ٹی پروموشن سے نوازا نقل لف ہے جس میں بد قسمتی سے میرا نام پھر سے شامل نہیں ہوا، زبان بچہ یہ بتائی گئی کہ مذکورہ چھ اساتذہ کو پھیلے تین حضرات نے چونکہ اب ڈگریاں مکمل کیں ہیں اس لئے پروموشن کیلئے اہل ہو گئے ہیں جبکہ باقی تین حضرات کو بوجہ زائد السری پھیلے تین ترقی ملی گئی۔
جناب عالی! اس سلسلہ میں میرا منور وقت یہ ہے کہ۔

(الف)۔ اہل ہونے کے باوجود پہلی DPC کے وقت محض غلامی اور میری بد قسمتی کے سبب مجھے مذکورہ پروموشن سے محروم رکھا گیا مگر دوسری DPC کے وقت تو آگئی تھی۔
میں ہدایات اور میری کسٹمز اہلیت کے سبب مجھے پروموشن آرڈر میں ٹاپ پر ہونا چاہیے تھا مگر پھر سے محروم رکھا گیا۔
(ب)۔ پہلے تین حضرات نے حال میں ڈگریاں حاصل کر کے اہلیت برائے پروموشن کا استحقاق حاصل کیا تھا۔ میں ان سے کالی پہلے سے پروموشن کیلئے اہل تھا۔
(ج)۔ باقی تین حضرات کو بوجہ زائد السری، انہوں نے پروموشن کیلئے فوقیت دی گئی لیکن سرورڈر کے تحت پہلے continue service کے تحت سینئر ٹی کا تین ہوتے ہیں۔
ہونے کی صورت میں زائد السری کو دیکھا جاتا ہے چونکہ مذکورہ باقی تین حضرات سے میری سرکاری سروس زیادہ ہے اس لئے ان سے زیادہ میرا پروموشن کا حق بنتا ہے۔
(د)۔ میری ہی ترقی جناب ڈائریکٹر صاحب سے حال ہی میں ایک پی ٹی سی اسٹاڈی انصاف کے تقاضوں کے تحت لراؤ در فرمائی ہے۔ لہذا اسٹڈی ہیکے تحت جس میں حق وادانہ ہو۔
تاکہ میں اپنے محکمہ کی انصافیوں کو عدالت میں اچھالنے سے بچ سکوں، دنا گورہ ہوگا۔

مورخہ 15-12-2014

العارض

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آپکا تابع دار مولوی انعام اللہ

Handwritten notes and signatures at the bottom of the page.

30

DISTRICT EDUCATION OFFICER,
(MALE) BANNU

No. 789

Dated Bannu the 19/01 2015

To

The Director,
Elementary & Secondary Education
Khyber Pakhtun Khwa Peshawar.

Subject: - REQUEST FOR PROMOTION AS STT B-16 IN R/O
INNAMULLAH TT GMS BEHRAM CHEH GARAH DISTRICT
BANNU

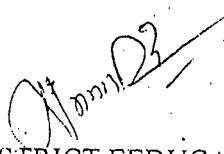
Memo,

Kindly refer to the remarks on the application submitted by Mr.
Innamullah Khan TT GMS Behram Cheh Garahi District Bannu Dated 15-12-2014.

It is submitted that:-

1. Mr. Innamullah Khan S/O Gul Shah Zadin was appointed as Deniyat Teacher (Religious Teacher) on temporary basis at Central Jail Hari Pur in BPS-06 Vide I.G. Prisons NWFP Peshawar office Order No 18898-99/WE Dated 02-11-2006.
2. The said teacher transferred to Bannu & reported to DDO Borstal Institute as RTT B-06 on 28-08-2008.
3. Mr. Innamullah Khan was adjusted/Appointed against TT Post in BPS-14 plus usual allowances as admissible under rules at GMS Behram Cheh Garahi District Bannu Vide EDO(E&S) Education Bannu No 13012-15 AE-III/TT/2009 Dated 21-04-2009. The said teacher took over charge as TT on 23-04-2009.

According to the above record the undersigned may kindly be guided whether his seniority may be counted with effect from 23-4-2009 OR 28-08-2008 OR 02-11-2006. (Photo copy of service Book is attached herewith)


DISTRICT EDUCATION OFFICER,
(MALE) BANNU



31

DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION
KHYBER PAKHTUNKHWA.

No. 1352 /F.No.285/Vol:LTT/AT/Qari(M).

Dated Peshawar the 3/4 /2015.

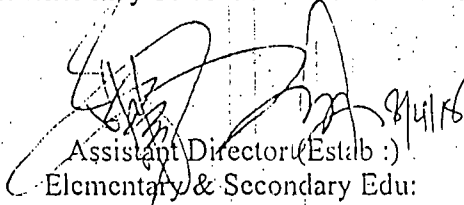
To.

The District Education Officer (M)
Bannu.

Subject: - **REQUEST FOR PROMOTION AS STT B-16 INNAMULLAH TT GMS**
BEHRAM GARIH DISTRICT BANNU.

Memo:-

I am directed to refer to your letter No.389 dated 19.01.2015 on the subject noted above and to state that the seniority of the above named TT teacher may be counted with effect from 23.04.2009.


Assistant Director (Estab :)
Elementary & Secondary Edu:
Khyber Pakhtunkhwa Peshawar.

Endst: No. _____

Copy forwarded to the:-

1. P.A to Director Elementary and Secondary Education Local Office.

Assistant Director (Estab :)
Elementary & Secondary Edu:
Khyber Pakhtunkhwa Peshawar.

1/14



32

To: The District Education Officer

(Male) Bannu.

Subject: ENQUIRY AGAINST THE APPLICATION/APPEAL FOR SENIORITY OF MR. INAMULLAH KHAN TT.

Memo

We the undersigned have been appointed as enquiry Officers vide your good self Endorsment No 7124/AE-I/Enquiry Inamullah TT dated 02.07.2015 to conduct enquiry against the application/appeal for seniority of Mr. Inamullah Khan TT. We visited District Education Officer (Male) Bannu on 07/11/2015 and checked all the available record of the above mentioned TT.

FINDINGS:

- 1- The Official concerned was appointed against the post of Dinyat Teacher in BS.06 at Haripur Jail vide 18898-99/WE dated 02.11.2006, He tookover acharge on 11.11.2006.
- 2- The official concerned has been transferred to Bannu Jail on 01/12/2008 in the same scale and pay.
- 3- The teacher concerned has been appointed against the Post of TT in BS 14 vide No 12411-56/AE iii/TT/2009 dated 16.04.2009 at S.No 25 at GMS Zaman Wazir Bannu.
- 4- As per the clarification of TT Post at GMS Zaman Wazir Bannu that their is no vacancy the official concerned has been adjusted at GMS Ch Ghari Mamsh Khel vide E/No 13012-15/P&T/TT/2009 dated 21.04.2009.
- 5- The Cadre and Scale of Jail Service and Education Department are different.
- 6- The teacher concerned has been relieved from Jail Department on 22/04/2009 AN as entry has been made in his original service Book on page No.09.
- 7- The official concerned has been appointed against the TT Post,he has no applied for the said post through proper channel and no entry has been made in his original service Book in this regard.
- 8- As per the terms and conditions of the appointment order, the official concerned has taken over charge on 23/04/2009 (FN).
- 9- The DEO (Male) Bannu has submitted letter for guidance regarding the seniority of the complainant vide Endorsment No.389 dated 19/01/2015 (copy attached).
- 10- The Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar has advised Vide No.1352/F.No.285/Vol:I/TT/AT/Qari (Male) dated Peshawar 08/04/2015 to DEO (Male) Bannu that seniority of the said teacher may be counted wef 23/04/2009 (copy attached)
- 11- The Official concerned has draw his pay and allowances upto 22.04.2009 on the post of Dinyat Teacher in Jail Department.

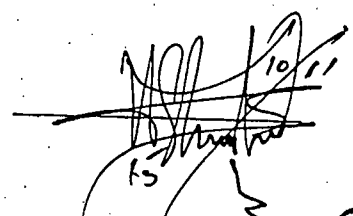
RECOMMENDATION

After the perusal of the available record of the official in the DEO (Male) Bannu ie the Service Book of the Complainant, Jail service record, ist appointment order as TT in the Education Department the enquiry committee recommends that as the complainant is newly appointed in the

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Education Department as is clear from his appointment order vide Endorsment No.12411-56/AE-III/TT/2009 dated 16/04/2009 and his relieving from Jail Department and taking over charge in the Education Department, hence he may be given seniority wef 23/04/2009.

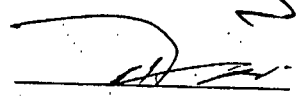
1- Saraf Ali Shah Chairman

 10/11

2- Gul Baqi Jan Khan Member



3- Mahmood Khan Member





Advance copy

خدمت جناب ڈائریکٹر صاحب ایڈمنسٹریٹو اینڈ سیکنڈری ایجوکیشن خیبر پختونخوا ایشیا اور

بوساطت جناب (M) DEO صاحب ضلع بنوں

درخواست برائے پروموشن سینئر ٹی ٹی

جناب عالی!

گزارش ہے کہ

میں نے اس سے قائل 15-12-2014 کو ایک تحریری درخواست جناب کی خدمت میں اس عرض سے گزاری تھی کہ بحیثیت سینئر ٹی کا ترقی حق رکھنے کے اور ڈی، پی، ای میں دو دفعہ شامل کرنے کے باوجود مجھے میرے حق سے محروم رکھا گیا۔ جناب والا نے میری مذکورہ درخواست پر جناب DEO صاحب کو نوٹ لکھا نقل لف ہے۔

جناب DEO صاحب کے دفتر میں حسب معمول ٹال منول سے کام لیا اور تقریباً ایک ماہ بعد چھٹی نمبر 389 مورخہ 19-01-2015 (نقل لف ہے) کے ذریعے میری سناری کی تاریخ سے متعلق جناب سے رہنمائی حاصل کی جو جناب شان والا نے چھٹی نمبر 1352 مورخہ 08-04-201 کے ذریعے میری سناری 23-04-2009 سے شمار کرنے کی رہنمائی فرمائی (نقل لف ہے)

مذکورہ کارروائی کے باوجود جناب DEO صاحب کے دفتر میں تیسری DPC کے ذریعے دیگر چار افراد کو ترقی دے کر مجھے پھر سے محروم رکھا گیا۔

حیرت کی بات یہ ہے کہ آپ جناب کے احکامات کو بھی نظر انداز کیا گیا ہے لہذا آخری بار پھر سے التجاء ہے کہ مجھے میرا بحیثیت سینئر ٹی کا حق عنایت فرمایا جائے ورنہ مجبور ہو کر اللہ پاک کی عدالت عظمیٰ کے ساتھ ساتھ دیگر دیناوی عدالتوں سے رجوع کرنے پر مجبور ہوں گا۔

العارض

مورخہ: 12-08-2015

آپ کا تابعدار مولوی انعام اللہ ولد بیت مولوی گل شہزادین مرحوم
معلم اسلامیات گورنمنٹ ایڈل سکول بہرام چہ گھڑی ممش خیل ضلع بنوں

موبائل نمبر: 0346-9285872

Ha
Zillahi
K. Wana

اللہ

35

DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION
KHYBER PAKHTUNKHWA.

3373
26/8/15

No 28/8 /F.No.285/TT/AT/Qari (M)

Dated Peshawar the 18/8 /2015.

To.

The District Education Officer(M)
Bannu.

Subject: - PROMOTION STT TO BPS-16.

Memo:-

I am directed to refer to the subject noted above and to enclose herewith a copy of the appeal in respect of Mr. Inamullah TT Government Middle School Behram Chh Ghari Mumtsh Khel District Bannu and to ask you to submit comments and fix responsibility for ignoring this promotion case.

H. A. Inamullah
Kicham

Deputy Director (Estab :)
Elementary & Secondary Edu:
Khyber Pakhtunkhwa Peshawar.
17/8/15

Endst :No. _____

Copy forwarded to the:-

- 1. P.A to Director Elementary and Secondary Local Office.

Shahi Payaz F/c

put up on file

& Report.

o

DRO
27/8

Deputy Director (Estab :)
Elementary & Secondary Edu:
Khyber Pakhtunkhwa Peshawar.

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36

DISTRICT EDUCATION OFFICER
(MALE) BANNU
No 6112 / AE-IV TT
Dated Bannu the 28/7/2016

Inquiry

To
The Director,
Elementary & Secondary Education
Khyber Pakhtun Khwa Peshawar.

Subject: - APPEAL FOR PROMOTION FROM TT TO STT IN R/O INNAMULLAH TT GMS
BEHRAM CHEH GARALI DISTRICT BANNU

Memo.

Kindly refer to your letter No 1807/F.No 02/Appeal of inservice teacher for promotion to SST (Male) Dated 13/06/2016 on the subject cited above

It is submitted that:-

1. Mr. Innamullah Khan S/O Gul Shah Zadin was appointed as Deniyat Teacher (Religious Teacher) on temporary basis at Central Jail Hari Por in BPS-06 Vide L.G. Prisons NWFP Peshawar office Order No 18898-99/WF Dated 02-11-2006.
2. The said teacher transferred to Bannu & reported to DDO Borstal Institute as RTT B-06 on 28-08-2008.
3. Mr. Innamullah Khan was adjusted/Appointed against TT Post in BPS-14 plus usual allowances as admissible under rules at GMS Behram Cheh Garali District Bannu Vide EDO(E&S) Education Bannu No 13012-15 AE-III/TT/2009 Dated 21-04-2009. The said teacher took over charge as TT on 23-04-2009.

According to his various appeals filed by him, the undersigned constituted the Enquiry committee for fixing the seniority of Mr. Innamullah Khan TT GMS Bheram Cheh Garali Bannu.

*Ha
Full
recom*

After thoroughly checking of the record of the concerned official the enquiry committee submitted the report & in the recommendation the committee submitted the following remarks

" After the perusal of the available record of the office in the DEO (Male) Bannu i.e. the Service Book of the complainant , Jail service record, 1st Appointment order as TT in the Education Department , the Enquiry committee recommends that as the complainant is newly appointed in the Education Department as it is clear from his Appointment order Endorsement No 12411-56/AE-III/TT/2009 Dated 16/04/2009 and his relieving from Jail Department and taking over charge in the the Education Department, hence he may be given seniority with effect from 23/04/2009 " (Copy of Enquiry committee attached)

Therefore, it is clear from the record that his sonority is considered from 23/04/2009.

Report is submitted for further necessary action please

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DISTRICT EDUCATION OFFICER,
(MALE) BANNU

L- (37)

Directorate of Elementary & Secy: Education
Khyber Pakhtunkhwa, Peshawar
No. ~~SOSB~~ No.2/SST (M)/Appeal of I service
teachers.

Dated Peshawar the 28/6/2016

To

The District Education Officer,
(Male) Bannu.

2957
24/7/16

Subject: - APPEAL FOR PROMOTION FROM TT TO STT IN RESPECT OF MR. INAMULLAH TT GMS, DEHRAM CHEH GARAH DISTRICT BANNU

Memo:

I am directed to refer to your letter No. 612 dated 28-07-2016 on the subject cited above and to ask you that the above named TT may be allowed seniority from the date of his relieving from Jail Department and sent working paper for his promotion to Senior TT if post available as per rules under intimation to this Directorate:

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Endst: No. _____

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Deputy Director (Estab)
Elementary & Secondary Education
Khyber Pakhtunkhwa.

Copy of the above is to:-

- 1. PA to Director (E&SE) Khyber Pakhtunkhwa, Peshawar.

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پڑھ کر
پڑھ کر اور رپورٹ
اور رپورٹ

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DRO
4/10

Handwritten signature
Deputy Director (Estab)
Elementary & Secondary Education
Khyber Pakhtunkhwa

Handwritten signature



M-38

OFFICE OF THE DISTRICT EDUCATION OFFICER
(MALE) BANNU

No 139 /TT/Appeal Dated 03/09/2017

To

The Director,
Elementary & Secondary Education
Khyber Pakhtun Khwa Peshawar

*Covering letter
along with the
list.*

Subject:- APPEAL FOR PROMOTION FROM TT TO S.T.T. IN RESPECT OF
MR. INAMULLAH T.T. GMS, DEHRI SYEDAN MAMASH KHEL
BANNU

Reference your Letter No 5056/F.No 2/STT(M)/Appeal of service teacher Dated 28-09-2016 on the subject cited above.

It is stated that seniority No in R/O Innamullah TT GMS Dehri Syedan Mamash Khel Bannu has been corrected & he has been placed at S/No 94. The appellant has been allowed his seniority from date of his relieving from Jail Department. The appellant was relieved from Jail Department on 22-04-2009.

It is also stated that seniority No of the appellant is 94 and TT BPS-15 to S.TT BPS-16 have already promoted up to Serial No 72. As his seniority No is 94, so he will wait for his turn.

*Inamullah
Khan*

-sd-

DISTRICT EDUCATION OFFICER
(MALE) BANNU

Endstt: No 140-43/AE-IV/TT Dated 03/09/2017
Copy for Information to the:-

1. District Account Officer Bannu.
2. Dy: District Education Officer (M) Bannu.
3. Accountant Middle Schools Local Office
4. Mr. Innamullah Khan TT GMS Behram Cheh Garahi Bannu

[Signature]
DISTRICT EDUCATION OFFICER
S/M (MALE) BANNU

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OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) BANNU

Final Seniority List of T T (Male) for the promotion of TT B-15 to Senior TT B-16.

S.No	Name of teacher with acedm:/profess: Quqlif:	Qualification	Father Name	BPS	D/o Birth	Domicile	D/o Fist Appiott:	D/o Present post.	Place of posting
1	Syed Habib Shah	SSC Nil	Mir Syed	15	12-02-59	Bannu	13-10-82	13-10-82	GMS Shaheed Baba
2	Ali Zaman TT(S.A-S.F-M.)	SSC Shadatul Almia	Zangi Marjan	15	21-09-59	do	16-12-82	16-12-82	GMS Bannu City
3	Zakir ullah Khan TT	SSC Shadatul Almia	Umer Daraz	16	16-07-59	do	28-10-84	28-10-84	GHSS Domel
4	M.Umer Khan TT SSC	SSC Shadatul Almia	Sher Bahdar	16	13-02-58	do	01-11-84	01-11-84	GHSS Bhangi Khan Khujari
5	M Israr TT BA	MA(Isl:)	Mir Sulmen	16	20-03-60	do	04-09-84	25-11-84	GHS NO3
6	M Sardar Ali TT	SSC Nil	M Paio	15	09-11-57	do	21-03-85	21-03-85	GHS Seru Bada Khel
7	Noor Khaliq Shah TT MA	FA Shadatul Almia	Amir Saleh Shah	16	01-03-57	do	15-10-85	17-10-85	GMS Ghajan Ismail
8	Latif Ur Rahman TT SSc	SSC	M Rahman	14	25-04-67	do	18-03-85	22-10-85	GMS Kauser Fatch khel
9	Muhibullah TT SSc	SSC Nil	Shaheedullah	15	20-04-65	do	11-10-87	11-10-87	GHS Mira Khel
10	Maqbol Shah T.T.SSC	SSC	Mir Rahman	15	25-11-67	do	11-10-87	11-10-87	GMS Aslam Khan Dz
11	Nek Nawaz TT MA	SSC Shadatul	Latif Kahn	16	01-07-60	do	12-10-87	12-10-87	GHS No 2
12	Gul Wali Shah TT	SSC Nil	Payo Shah	15	01-07-58	do	13-10-87	13-10-87	GHS S K Bala Bannu
13	Abdu Satar TT	SSC	Hakim Khan	15	25-07-68	do	07-10-89	07-10-89	GMS Kachkot Asad Surrani
14	M Tasleem TT SSc	SSC Shadatul	M Amin	16	10-02-69	do	07-10-89	07-10-89	GMS Kauser Fatch khel
15	Muhaminad Subhan TT	SSC Nil	Amir Shah Jahan	15	23-09-59	do	10-10-89	10-10-89	GHS Nar sukurullah
16	Sher Bahader Khan TT	MA	Bahader Khan	16	06-05-72	do	01-03-90	01-03-90	GHS Amandi Umer Khan
17	NazAmir Khan TT	SSC Nil	Salah Khan	15	01-01-65	do	15-04-90	15-04-90	GHS Nar sukurullah
18	Muhammad Amin TT	SSC Nil	Gul Bar Khan	15	25-04-58	do	23-04-90	23-04-90	GHS Kinger Jan Bahader
19	Bad Shah Zadin TT	SSC Nil	Zahir Din	15	01-07-65	do	24-04-90	24-04-90	GHS NO3
20	Noor Aslam TT	SSC Shadatul	Mir Haus Khan	16	25-05-65	do	09-05-92	09-05-92	GHS No2 Bannu
21	Rahmat Ullah TT MA	MA(Isl:)	Muhammad Saeed	16	25-01-64	do	25-04-92	17-05-92	GHS F.S Mitha Khel
22	Islam Khan TT	SSC Nil	Toor Khan	15	23-10-57	do	06-03-82	16-11-92	GHS Hlibak Sherza Khan

39

Muhammad
Khan

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S.No	Name of teacher with acadm/profess: Qualif:	Qualification	Father Name	BPS	D o Birth	Domicile	D'o Fis: Appoint:	D'o Present post.	Place of posting
									GHS Degan Taji killa
23	M Amin Ullah TT FA	SSC Shadatul	Abdul Ghafoor Khan	16	1.11.1964	do	07-05-92	01-01-93	GHS Degan Taji killa
24	Rahmat Ullah TT	SSC Nil	Paio Rahman	15	01-12-64	do	19-05-93	19-05-93	GHSS NURAR
25	Shad Ayaz TT	SSC Shadatul	Amir Sultan	16	02-04-67	do	19-05-93	19-05-93	GHS Jan Killa
26	M Aman Khan TT MA B.Ed	MA(Isl.)	M Luqman Khan	16	02-11-73	do	19-05-93	19-05-93	GHSS Kakki Bannu
27	M Ishaq TT	SSC Shadatul	Abdul Jabar Khan	15	25-08-69	do	24-05-93	24-05-93	GHS Gul Zaman Ghoriwala
28	Sher Ali SSC Almia	SSC Shadatul	Gul Mir Shah	15	31-12-65	do	25-05-93	25-05-93	GMS Gamber
29	Muhammad Niaz TT	MA(Isl.)	Dar Ali Khan	16	06-02-66	do	13-04-96	13-04-96	GMS Khowajamad
30	M Farooq TT SSC	SSC	M Sultan	15	20-09-68	do	22-09-96	22-09-96	GMS Hasan khel
31	Saifullah TT SSC / Alia	SSC Shadatul	Hashim Khan	15	28-10-76	do	22-09-96	22-09-96	GMS Ghulam Jan
32	Afsar Zaman TT D com	FA	Zar Gul	15	10-03-68	do	23-09-96	23-09-96	GHS Sher Gul Khujari
33	Shafaq Rasool TT MA	MA(Isl.)	Gul Rasool	16	01-05-72	do	23-09-96	23-09-96	GMS Ali Mat
34	Samiul Islam TT	BA	Noor Ali Jan	15	14-10-76	do	23-09-96	23-09-96	GMS Allah Dad Mamash
35	Gul Faraz Khan TT SSC	SSC Shadatul	Gul Daraz Khan	15	15-06-68	do	16-09-90	24-09-96	GHSS Mamash Khel
36	M Salim TT BA	SSC	M Roshan	15	15-06-72	do	24-09-96	24-09-96	GMS Atlas Khan
37	Muhib Zaman TT MA	SSC Shadatul	Ghous Zaman	15	04-03-69	do	25-09-96	25-09-96	GMS Jhandu Khel
38	Ashraf Ali TT	SSC Nil	Muhammad Ali	16	01-03-73	do	25-09-96	25-09-96	GMS Nar Hafiz
39	Dilawar Khan TT MA BEd	MA(Isl.)	Sarwar Khan	16	09-09-74	do	25-09-96	25-09-96	GMS Jahangir Laloza
40	Abdul Ghafoor TT MA	SSC Shadatul	Abdul Shakoor	16	21-09-68	do	26-09-96	26-09-96	GHS S K Bala
41	Ahmad Ali TT MA BEd	MA(Isl.)	Sardar Ali	16	05-05-73	do	12-02-98	12-02-98	GHS Bahader Manak Khel
42	Kifayatullah TT	SSC Shadatul	Rauf Khan	16	01-10-74	do	23-05-98	23-05-98	GHS Khadri Muhammad Khel
43	Rahm Gul TT BA MA	SSC Shadatul	Naseem Gul	16	19-04-66	do	16-04-99	16-04-99	GMS Sabo khel Mandan
44	Abdul Ghafoor TT BA	BA	Mukaram Shah	16	05-02-71	do	16-04-99	16-04-99	GHSS Ismail khel
45	Ahmad Shah TT MA BEd	MA(Isl.)	M Ali Shah	16	09-01-70	do	19-04-99	19-04-99	GHS Shamshi khel
46	M Daraz Khan TT FA	FA	M Amir Shah	15	28-03-75	do	19-04-99	19-04-99	GMS Ismaili Mama khel
47	M Sadiq MA TT	SSC Shadatul	Abdur Rashid	15	05-03-74	do	22-12-99	22-12-99	GMS Qader Shah
48	Asmat Ullah TT	MA(Isl.)	Habib Rahman	16	19-03-74	do	22-12-99	22-12-99	GHS No 1 Bannu
49	Samiul Haq TT	SSC	Zahid Shah	15	14-04-75	do	22-12-99	22-12-99	GMS Hassan Khel Jaffar
50	Kafiyat Ullah TT MA	SSC Shadatul	Shah Rasool	16	01-08-75	do	22-12-99	22-12-99	GHS Azim Killa
51	Hidayatullah TT BA BEd	BA	Amanullah	16	27-01-76	do	22-12-99	22-12-99	GHS Khujari Babar

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S.No	Name of teacher with acadm./profess: Qualif:	Qualification	Father Name	BPS	D'o Birth	Domicile	D o Fisi Appiott:	D o Presen post:	Place of posting
52	Abdul Satar TT MA	SSC Shadatul	Rahim Gul	16	18-03-70	do	11-2000	11/2000	GMS Admi Sultan Shah
53	Muhammad Nazir TT MA	MA(Isl:)	Zar Ali Khan	16	22-03-67	do	23-09-03	23-09-03	GHS Wali Zar Killa
54	Imdadullah TT FA	FA	Awal Riaz Khan	15	03-04-75	do	10-10-03	10-10-03	GHS K.M.Khan
55	Asmatullah TT MA BEd	MA(Isl:)	M Rahman	16	10-04-77	do	24-03-05	24-03-05	GMS Hinjal Noor Baz
56	M, Yousaf TT MA Med:	MA(Isl:)	Nawab Khan	16	15-05-77	do	24-03-05	24-03-05	GHS No 4 Bannu
57	Asghar Ali Shah TT	MA(Isl:)	Mir Zali Shah	16	20-04-80	do	24-03-05	24-03-05	GHSS Lalozai Bannu
58	Abed Khan	MA(Isl:)	Umer Nawaz Khan	16	03-03-80	do	25-03-05	25-03-05	GMS Piran-Daud Shah
59	Shah Fahad TT MA	MA(Isl:)	Qasim khan	16	09-09-84	do	25-02-06	25-02-06	GMS Bazida Yousaf
60	Raham Nawaz TT BA	MA English	M Daraz	16	10-01-87	do	01-09-06	01-09-06	GMS Degan Shadi
61	Wahid ullah TT FA	FA	Awarangzeb	16	20-01-76	do	01-12-06	01-12-06	GHS Dhandi Wazir
62	Fasihullah	SSC Shadatul	Alif Gul	15	09-10-80	do	25-07-14	16-04-2009	GHS Teor Kakki Bannu
63	M Nawaz TT MA	MA(Isl:)	M Ayaz	16	10-07-73	do	17-04-09	17-04-09	GHS Bazar Ahmad khan
64	Azizullah TT MA	MA(Isl:)	Noor Ali Shah	16	08-02-77	do	17-04-09	17-04-09	GHS Koti Sadat Bannu
65	Fazal Rahman TT MA	MA(Isl:)	Raheem Gul	16	04-05-77	do	17-04-09	17-04-09	GMS Dabak Syed khel
66	Naimat ullah TT MA	MA(Isl:)	Izzat khan	16	05-06-79	do	17-04-09	17-04-09	GMS Hassan khel Kheraki
67	Nasib Ullah TT MA BEd	MA(Isl:)	Fazal Dayan	16	25-12-79	do	17-04-09	17-04-09	GHS Mandew
68	Qazi Kefayat Ullah TT MA	MA(Isl:)	Qazi M Ishaq	16	01-04-80	do	17-04-09	17-04-09	GMS Nurur Khass
69	Hidayat ullah TT BA	BA	Abdul Wahab	16	01-09-80	do	17-04-09	17-04-09	GMS Sadat Hassani
70	Hashmat Ali TT MA BEd	MA(Isl:)	Syed Kamil	15	07-10-80	do	17-04-09	17-04-09	GHS Seru Bada Khel
71	Qismatullah Khan TT MA Bed	MA(Isl:)	M Gulam	16	03-03-81	do	17-04-09	17-04-09	GHS Kach Kot Asad Khan
72	Nek zali B.A Alamiya	BA	Ghulam Rabi	15	11-03-81	do	17-04-09	17-04-09	GMS Khwajamad Landidat
73	Nek Dar khan TT MA B.Ed	MA(Isl:)	Fojdar khan	15	30-03-81	do	17-04-09	17-04-09	GHS Ajmal Barlashti
74	M.Usman T.T.M.A.B.ed	MA(Isl:)	M.Abdul Kabir	15	12-09-81	do	17-04-09	17-04-09	GMS Kot Zafar
75	Hidayat Ullah TT MA B.Ed	MA(Isl:)	Muhammad Tayab	15	26-02-82	do	17-04-09	17-04-09	GHS No 1
76	Israrud Din TT MA	MA(Isl:)	Zahir Din	15	03-04-82	do	17-04-09	17-04-09	GHS Bharati Mitchan khel
77	Khurshid Ahmad TT FA	FA	Saeed Zaman	15	06-04-82	do	17-04-09	17-04-09	GHS Ganji Daud
78	Muhammad Sabir Khan TT MA BEd	MA(Isl:)	Gul Nawaz	15	07-04-82	do	17-04-09	17-04-09	GMS Khujari Noor Ali
79	Rahman ullah TT MA BEd	MA(Isl:)	Rand Ali	15	16-04-82	do	17-04-09	17-04-09	GHS S S khel
80	M Musa Shah TT MA	MA(Isl:)	Ahtar Munir Shah	15	02-09-82	do	17-04-09	17-04-09	GHS S Bannu

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S.No	Name of teacher with acadm./profess: Qualif:	Qualification	Father Name	BPS	D'o Birth	Domicile	D'o Fis: Appoiu:	D'o Present post.	Place of posting
81	Shamasher ullah TT MA	MA(Isl:)	Sher Bahader	15	18-09-82	do	17-04-09	17-04-09	GHS Dheri Saeedan
82	Abdul Haq BA	BA	Amin Ullah	15	10-03-83	do	17-04-09	17-04-09	GMS GMS Dargi Khel Suram
83	Abul Wahab TT MA	MA(Isl:)	M Roshan	15	01-05-83	do	17-04-09	17-04-09	GMS Dil Nawaz
84	Wasifullah Shah TT MA	MA(Isl:)	S. Akhtar Ali Shah	15	06-08-83	do	17-04-09	17-04-09	GMS Nar Jaffar
85	Abdullah TT MSc MEd	MSc	Rahmatullah Shah	15	01-09-83	do	17-04-09	17-04-09	GMS Dilasa Mandew
86	Samad Ghafar TT FA	FA	Habib Ghafar	15	28-01-84	do	17-04-09	17-04-09	GMS Allah Dad Mamash Khel
87	Arifullah TT MA Bed:	MA(Isl:)	Muhammad Zarif	15	04-04-84	do	17-04-09	17-04-09	GMS Sakhi Sarwar Mandew
88	Hik Matullah TT FA	FA	Habiburahman	15	01-04-85	do	17-04-09	17-04-09	GMS Pir khel Kakki
89	Baseerudin TT MA	MA(Isl:)	Zaheerudin	15	09-04-85	do	17-04-09	17-04-09	GMS Bhangi Khan
90	Sadullah Khan TT	SSC Shadatul	Falaq Naz	15	20-05-86	do	17-04-09	17-04-09	GHS Ghoriwala
91	Zakiullah Shah TT MA Bed:	MA(Isl:)	Musekir Shah	15	10-03-84	do	18-04-09	18-04-09	GHS Hakim Bhart
92	Rajab Ullah Khan	SSC Shadatul	Muhammad Sohrab	15	20-10-76	do	20-04-09	20-04-09	GMS Gambar
93	Abdurazaq TT MA	MA(Isl:)	M Saeed	15	06-03-73	do	22-04-09	22-04-09	GHSS NURAR
94	Inam ullah TT MA B.ed	MA(Isl:)	Gul shadin	15	07-02-78	do	11-11-06	22-04-09	GMS Che Ghargi
95	Sana Ullah TT MA	MA(Isl:)	M Ayub	15	23-09-75	do	23-04-09	23-04-09	GMS Zaman Wazer
96	Amteyaz Khan TT MA	MA(Isl:)	Azad Khan	15	08-10-75	do	23-04-09	23-04-09	GHS Khan Zaman Nurar
97	Abdul Tawab	SSC Shadatul	Qamar Zaman	15	16-05-67	do	16-05-09	16-05-09	GMS Mir Alam Chashmai
98	Abdul Mohaiman TT MA	MA	Mir Muhammad	16	02-02-76	do	04-07-09	04-07-09	GMS Hasani Dara Shah
99	Sultan Ali TT	SSC Shadatul	Ghulam Ali	15	03-02-78	do	20-12-10	20-10-10	GMS Sardad
100	Asmatullah TT BA	BA	Bagh ali shahi	15	10-04-82	do	26-10-10	26-10-10	GMS Asad khujari
101	Saeed ullah TT FA	FA	Abbas Khan	15	05-11-79	do	20-12-10	20-12-10	GHS Bilawar khan
102	Shafiq Ahmad TT FA	FA	Gulam Raqib	15	22-05-83	do	20-12-10	20-12-10	GHS Bizen khel
103	Shamsu Rahman TT	SSC Shadatul	Khali Ur Rahman	15	05-01-86	do	20-12-10	20-12-10	GMS Moimullah Umerzai
104	Naimt Ullah TT	SSC Shadatul	Muhamamd Yousaf	15	16/5/1972	do	24-04-09	21-12-10	GMS Luban Khujari
105	Shafillah Khan TT FA	FA	Mir Payo Khan	15	21-01-79	do	20-12-10	21-12-10	GMS Nizam Darwa
106	Muhammad Shahid Ullah	SSC Shadatul	Muhammad Saif	15	10-08-82	do	21-12-10	21-12-10	GMS Muhamm Lazmididak
107	M, Tahir TT FA	FA	M, Yousaf	15	12-04-83	do	21-12-10	21-12-10	GHS Hukum Zad
108	Mukhtiar Khan	SSC Shadatul	Nek Nawaz	15	06-11-77	do	07-02-14	07-02-11	GMS Aqlim Khan Killa
109	Shah Faisal	SSC Shadatul	Zaid Ullah	15	01-04-81	do	7/2/2011	7/2/2011	GH Jan Killa

S.No	Name of teacher with acedmi: profes: Qualif:	Qualification	Father Name	BPS	D/o Birth	Domicile	D/o Firt Appiott:	D/o Present post.	Place of posing
110	Muhammad Zubair	SSC Shadanul	Khan Zaman	15	04-04-76	do	05-09-11	05-09-11	GMS Amir Ghaffar Ghera-Baka Khel Bannu

Certificate :-

1. It is certified that all the TTs (Male) included in the panel for the Promotion of TT-BPS 15 to Senior TT-BPS-16

- A). Hold the posts on regular basis and non of them is holding the post on adhoc/ acting charge basis/ contract
- B). Have Completed the required minimum length of qualifying service and qualification as required for promotion of TT BPS-15 to Senior TT EPS-16 on under the rules
- C). None of them is on deputation to any organization under the federal/ provincial / Autonomous/Semi autonomous/ International organiz (M) Secy: Bannu
- D). Neither any disciplinary /departmental proceeding/Anti Corruption judicial enquiry is pending against them nor has any penalty been imposed upon any one of them during the last five years.
- E). No one is on long leave/Ex-Pakistan Leave.
- F). There ACRs, Synopses are free from adverse remarks
- G). There are all alive and serving.
- H). Their appointment order against TTs posts are attached herewith.
- I). The Seniority list of BPS-16 officers is final, undisputed and not subjoined.

2. The departmental committee is requested to determine the suitability of the above TTs for promotion of TCT BPS-15 to Senior TT BPS-16 with immediate effect.

[Signature]
District Education Officer
Male Bannu

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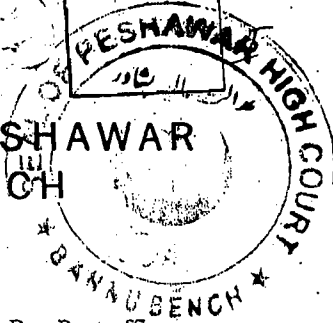
HA
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Bannu

BEFORE THE HONOURABLE PESHAWAR
HIGH COURT BANNU BENCH

Writ Petition No. 187-B of 2017

Hafiz Inamullah son of Molvi Gul Shahzadin resident of Hinjel Noor Baz Post office

Bannu, Tehsil & District Bannu.



N-44

(PETITIONER)

VS

1. The Secretary Elementary & Secondary Education Govt. of Khyber Pakhtunkhwa, Peshawar.
2. The Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. District Education Officer (Male), Elementary & Secondary Education, Bannu.
4. The District Account Officer, District Bannu.

(RESPONDENTS)

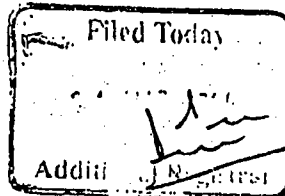
Writ Petition under Article 199 of the Constitution of Islamic
Republic of Pakistan, 1973.

Respected Sir:-

The petitioner humbly submits as under:-

1. That the addresses mentioned in the caption of this writ petition are sufficient for the service of the parties.
2. That the petitioner is the permanent resident of District Bannu and have good moral character. (Copy of CNIC is mark A)
3. That the petitioner was initially appointed as Theology Teacher (BPS-14) on 16-04-2009 and after appointment the petitioner resumed charge on the said post on 23-04-2009 and on 02-12-2012 the petitioner was promoted to BPS-15. (Copies of appointment order dated 16-04-2009 and service book of the petitioner are mark B & C respectively)

Hafiz Inamullah
son of Molvi Gul Shahzadin



ATTESTED
EXAMINER
Peshawar High Court
Bannu Bench

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4. That on 17-04-2014 departmental promotion committee was constituted by the respondents wherein the name of the petitioner was inducted but he was not promoted, therefore being aggrieved the petitioner preferred department appeal to the Director Education Khyber Pakhtunkhwa Peshawar who after entertaining the same directed the District Education Officer, Bannu to include the name of the petitioner in the next department promotion committee. (Copy of departmental appeal is mark D)
5. That in the next Departmental Promotion Committee constituted on 10-11-2014, the name of the petitioner was inducted by the respondents but he was once again not considered, then the petitioner being aggrieved also preferred departmental appeal to the Director of Education Khyber Pakhtunkhwa Peshawar, the Director Education after entertaining the appeal of the petitioner directed the District Education Officer, Bannu to send working paper and detail of seniority of the petitioner and available vacant post. (Copies of working papers and departmental appeal of the petitioner are mark E and F respectively)
6. That as the petitioner in his Departmental appeal had prayed the seniority of his previous service rendered by him in Jail Department, therefore, prior to sending reply to the Director Education the District Education Officer, Bannu sought guidance from Director education to the effect that " the undersigned may kindly be guided whether the seniority may be counted from 23-04-2009 or 28-08-2008 or 02-11-2006 then the Director Education directed him to recon the same from the date of resuming the charge i.e. dated 23-04-2009". (Copies of letter No. 379 dated 19-01-2015 and letter dated 08-04-2015 are mark G & H respectively)

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Filed Today
01 MAR 2015
Additional Registrar

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Peshawar High Court
Bannu District

- 7. That thereafter the petitioner once again filed an application to the Director Education stating therein his grievance which application was entertained and the director education once again sought comments from District Education Officer who after inquiry into the matter submitted comments. (Copy of application along with covering letter and comments are mark I and J respectively)
- 8. That after receiving comments the Director Education wrote a letter dated 28-08-2016, directing the District Education officer to allow the seniority to the petitioner from the date of his relieving from Jail Department upon which the District Education Officer submitted seniority list of the petitioner which shows the name of the petitioner at serial No. 94. (Copy of letter dated 28-08-2016 and sonority list along with covering letter are mark K and L respectively)
- 9. That the petitioner time and again requested to the respondents to count his seniority from the date of his appointment i.e. 16-04-2009 and not from the date of resuming the charge i.e. 23-04-2009 but the respondents are not counting his seniority from the date of his appointment, therefore, the petitioner being aggrieved from the acts of the respondents approaches this Hon'ble court through this writ petition on the following grounds inter alia:-

Ullah Khan

GROUND:-

- 1. That as the petitioner has been appointed on 16-04-2009 along with other candidates, therefore, the act of respondents by not considering the service of the petitioner from 16-04-2009 is against the law, rules, policy and is ineffective upon the rights of the petitioner and therefore, the same may kindly be declared as null and void.
- 2. That in the seniority list the name of the petitioner is available at serial No. 94 and against the name of the petitioner the date of first appointment has been provided as 22.04.2009 while the appointment

Today
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 Registrar

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 Registrar
 District Education Officer
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 District Education Officer

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order of the petitioner transpires the date of appointment of the petitioner as 16.04.2009, therefore the respondents have wrongly mentioned the date of first appointment of the petitioner as 22.04.2009.

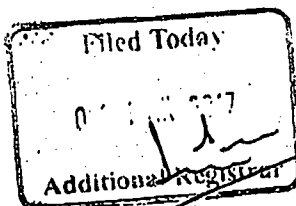
3. That most of the candidates who had been appointed on 16.04.2009 along with the petitioner had been promoted while due to the malafide and dishonestly of the respondents, the petitioner has still not been promoted. The example of such like candidates is available which is mark M.
4. That from the time when the petitioner become eligible for promotion three departmental promotion committees were constituted but in all of those DPCs the petitioner was not promoted for the reason that the respondents are counting the service of the petitioner from the date of resuming the charge and they are not ready to count the service of the petitioner from the date of his appointment which act of the respondents is based upon malafide and dishonesty and therefore the same is not sustainable in the eyes of law.
5. That the learned counsel for the petitioner may kindly be allowed to raise additional grounds at the time of hearing of this writ petition.

Therefore, it is humbly prayed that on acceptance of this writ petition the respondents may kindly be directed to count the service of the petitioner from the date of his appointment i.e. 16-04-2009 and also to correct and verify the service book of the petitioner and also to promote the petitioner from BPS-15 to BPS-16 Senior Theology Teacher with all back benefits and any other relief which this honorable court deem appropriate may also be granted.

Petitioner
Hafiz Inamullah
Through Counsel

Hafiz Inamullah
Hafeez Ullah Khan Advocate
High Court Bannu Bench

ATTESTED

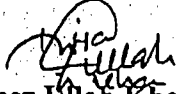


INTERIM RELIEF:-

By keeping in view the above facts and circumstances the respondents may kindly directed to lay one post vacant for the petitioner till final disposal of the instant writ petition.

Petitioner

Through Counsel



Hafeez Ullah Khan Advocate
High Court Bannu Bench.

CERTIFICATE

It is certified that neither any such like petition has earlier been filed by the petitioner nor the same is pending in any other court.

Petitioner

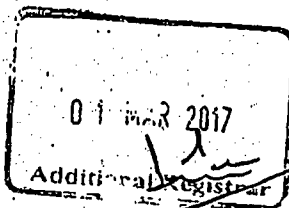
Through Counsel


Hafeez Ullah Khan Advocate
High Court Bannu Bench

LIST OF BOOK:-

1. Constitution of Islamic Republic of Pakistan 1973.
2. Any other case laws.

ATTESTED
EXAMINER
Khyber Pakhtunkhwa High Court
Bannu Bench



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PESHAWAR HIGH COURT,
BANNU BENCH.

FORM 'A'

FORM OF ORDER SHEET

Date of order or proceedings (1)	Order or other proceedings with signature of Judge (s). (2)
14.03.2017	<p><u>W.P No.186-B of 2017.</u></p> <p>Present:</p> <p>Mr. Hafeezullah Khan Advocate for the petitioner. ***</p> <p>Respondents No.2 and 3 shall file their para-wise comments within a fortnight.</p> <p><u>JUDGE</u></p> <p><u>JUDGE</u></p> <p>CERTIFIED TO BE TRUE COPY</p> <p>Examined 27/3/2017</p> <p>Peshawar High Court Bannu Bench Authorized Under Article 27 of The Judicature (Bannu) Order 199</p>

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**JUDGMENT SHEET
IN THE PESHAWAR HIGH COURT,
BANNU BENCH.**

(Judicial Department)

W.P No.186-B of 2017.

Hafiz Inam Ullah

Vs

Secretary Education and others.

JUDGMENT

Date of hearing _____ 19.11.2019 _____

Appellant-Petitioner by Mr. Hafeez
Ullah Khan Adv.

Respondent by Mr. Qudus
Ullah Khan Adv.

IKRAMULLAH KHAN, J.- Through the instant writ
petition, petitioner seeks the following relief:-

" It is humbly prayed that on
acceptance of this writ petition the
respondents may kindly be directed to
count the service of the petitioner from
the date of his appointment i.e.
16.4.2009 and also to correct and verify
the service book of the petitioner and

M

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ATTESTED
JUDGE
Peshawar High Court
Bannu Bench

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also to promote the petitioner from BPS-15 to BPS-16 Senior Theology Teacher with all back benefits and any other relief which this Hon'ble Court deem appropriate may also be granted."

2. In essence, petitioner being senior Theology Teacher but his junior were promoted while petitioner is being ignored by the respondents, hence the instant writ petition.

3. Arguments heard and record perused.

4. Admittedly, petitioner is a civil servant while the respondents department has also admitted the due right of the petitioner to be promoted on the basis of seniority. The Deputy Director Establishment Elementary & Secondary Education, Khyber Pakhtunkhwa vide its letter dated 27.9.2016 had also directed the relevant authorities for sending of working papers of the petitioner for promotion to senior Theology Teacher but the appellate authorities failed to pass a concise definite order in respect of seniority as well as promotion of the petitioner. Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 bars the jurisdiction of the Service Tribunal in respect of

ATTESTED
ENCLINER
Peshawar High Court
Bannu Bench

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52

promotion, denied to a civil servant by the departmental authority on account of fitness or otherwise. As petitioner is being considered by the departmental promotion committee but he was not considered for promotion without any reason, therefore, irrespective of merit of the case, we deem it appropriate to send this case to the concerned appellate authority/respondents to decide the grievance of the petitioner one way or other within 30 days positively but strictly in accordance with law and if the grievance of the petitioner is not resolved, the appellate authority shall give reasons thereof.

Announced.
19.11.2019

Sd Justice Ikramullah Khan, j
Sd Justice Sahibzada Asadullah, j

Ihsan

CERTIFIED TO BE TRUE COPY

[Handwritten Signature]
 21/11/19

Examiner
 Peshawar High Court Bench
 Authorised under Rule 87 of
 The Qanun-e-Shahadat Ordinance 1984

Hon'ble Mr. Justice Ikramullah Khan &
 Hon'ble Mr. Justice Sahibzada Asadullah.

[Handwritten Signature]

[Handwritten Signature]

Directorate of Elementary & Secondary Education

Khyber Pakhtunkhwa, Peshawar

No. 933 / F.No. TT/.STT (M)/Promotion Cases

Dated Peshawar the 16/7/2020

0-53

To

The District Education Officer,

(Male) Bannu.

Subject: -

**GRANT OF SENIORITY IN THE LIGHT OF PESHAWAR HIGHCOURT
BANNU BENCH JUDGEMENT UNDER THE W.P NO/.186-B/2017
DATED 19-11-2019**

Memo:

I am directed to enclose herewith an application bearing No.1110 dated 26-06-2020 on the subject cited above, submitted to this office by Mr. Inam Ullah TT at GMS Behram Chey Garhi along with the subject mentioned court judgement for your perusal and to ask you to decide the case in the light of the court judgement and issue a speaking order to the applicant concerned, under intimation to this office, as per rules please.

Inam B
15/7/2020

Assistant Director (Estab)
Elementary & Secondary Education
Khyber Pakhtunkhwa

15/7/2020

Endst: No. _____

Copy of the above is to:-

1. PA to Director (E&SE) Local Directorate.

Assistant Director (Estab)
Elementary & Secondary Education
Khyber Pakhtunkhwa

HA



DISTRICT EDUCATION OFFICER (MALE) BANNU

PhoneNo & FaxNo:0928-660005
Email Id: bannuedo@yahoo.com



OFFICE ORDER

P-54

Consequent upon the recommendation of the Department Promotion Committee and in pursuance of the Govt: of Khyber Pakhtunkhwa Elementary & Secondary Education Department Notification No So (B&A)/1-18/E&SE/2012 Dated 11/07/2012 & Finance Department Khyber Pakhtunkhwa Peshawar Endst: No.SO(FR)/FD/10-22(E/2010 Dated 16-07-2012 & Director Elementary & Secondary Education Khyber Pakhtunkhwa Endst No.2825-30 / F.No.1/Promotion STT (B-16) Dated Peshawar the 08-12-2020 the following Male TTs B-15 are hereby promoted to the post of Senior TT B-16 (Rs.18910-1520-64510) plus usual allowances as admissible under the rules on regular basis under the existing policy of the provincial Govt: for teaching Cader on the terms & conditions given below with immediate effect and further they will be posted in the Govt: Higher Secondary / High School by the District Education officer Concerned against the newly upgraded STT B-16 Posts.

S#	S_NO	NAME OF THE TEACHER	BPS	PLACE OF POSTING AS A TT B-15	PLACE OF POSTING AS SENIOR TT B-16	REMARKS
1	71	Abdur Razaq	15	GMS Sabo Khel Mandan Bannu	GHS No.3 Bannu	AVP STT B-16
2	72	Imtiaz Khan	15	GHS Khan Zaman Nurar Bannu	GHS Khan Zaman Nurar Bannu	The Post of TT B-15 GHS Khan Zaman Nurar Bannu Upgraded to STT B-16
3	73	Inam Ullah	15	GMS Chegari Mamsh Khel Bannu	GHSS Amandi Umer Khan Bannu	AVP STT B-16
4	74	Naimat Ullah	15	GMS Luban Khujari Bannu	GHS Hassan Khel Jaffar Khan Bannu	The Post of TT B-15 GHS Hassan Khel Jaffar Khan Bannu Upgraded to STT B-16
5	75	Abdul Tawab Khan	15	GHS Hinjal Noorbaz Bannu	GHS Hinjal Noorbaz Bannu	The Post of TT B-15 GHS Hinjal Noorbaz Bannu Upgraded to STT B-16

Terms & Conditions

9. They Should be on probation for a period of one year extendable for another one year.
10. They will be governed by such rules and regulations as may be issued from time to time by the Government.
11. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, he shall be preceded under the rules framed from time to time.
12. Charge report should be submitted to all concerned.

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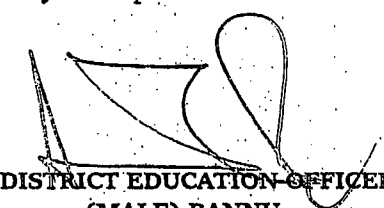
13. Their Inter-se-seniority on lower post will remain intact.
14. No TA/DA is allowed for joining their duty.
15. They will give an under taking to be recorded in their service book to the effect that if any over-payment is made to him in light of this order will be recovered and if he is wrongly promoted, he will be reversed.
16. Before handing over charge their documents may be checked. If they have not the required relevant qualification as per rules, they may not be handed over charge of the post.

(DR: ABDUL MALIK)
District Education Officer
(Male) Bannu

ENDST NO. 12697-12710 / AE-II/TT MALE/ESTAB: DATED. 22/12/2020.

Copy for information and N/A to the:-

10. PS to Secretary Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
11. PS to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
12. Deputy District Education Officer (Male) Bannu.
13. District Account Officer Bannu.
14. Accountant Middle Schools local Office Bannu.
15. The Head of Institutions Concerned Schools in Bannu.
16. Teachers Concerned for strict compliance & report.
17. DMO Bannu.
18. EMIS Local Office with the correction of data in your reports.


DISTRICT EDUCATION OFFICER
(MALE) BANNU

Taj Murad JC
bannuedo@yahoo.com; 0928-660005
Promotion Order TT to STT 2020 DEO M Bannu

اپیل: بخدمت جناب ڈسٹرکٹ ایجوکیشن آفیسر (مردانہ) ضلع بنوں

55-9

عنوان برائے درخواست: بنوں ہائی کورٹ بیچ (ریلیف) فیصلے کی روشنی میں سنیر (ٹی۔ٹی۔16-BPS) کے تمام مراعات فراہم کرنے کی استدعا۔

جناب عالی!

گزارش کی جاتی ہے کہ فدوی سائل 17-04-2014 ڈی۔ پی سی میں سینیارٹی لسٹ سے نمبر 72 پر شامل ہونے کے باوجود 17-09-2020 تک سنیر ٹی۔ ٹی پروموشن سے محروم چلے آ رہا تھا۔ اپنی محکمہ تعلیم میں کافی حد تک کوشش کی 12-08-2015 کے درخواست پر ڈائریکٹر صاحب نے سائل کا پروموشن کا حق تسلیم کیا۔ مگر دفتر ہذا میں کچھ تحفظات ہونے کی وجہ سے عدالت عالیہ کا دروازہ کھٹکھٹایا اور عدالت نے بھی سائل کے حق میں لکھ کر فیصلہ دیا۔

جناب شان والا: سائل کا تقریری 16-04-2009 ہے اور تنخواہ 23-04-2009 سے ہے۔ اور دفتر ہذا نے نوٹیفکیشن آرڈر مورخہ: 22-12-2020 میں سینیارٹی لسٹ سے دوبارہ نمبر 73 پر شامل کر کے سینیارٹی بحال کر دیا (کاپی لف ہے) اور پروموشن دے دیا۔ لہذا اپ صاحب مہربانی فرما کر 2014 نوٹیفکیشن آرڈر مورخہ: 27-05-2014 سے لیکر 22-12-2020 تک سنیر ٹی۔ ٹی۔16-BPS کے جتنی مراعات ہیں۔ سائل کو دینے کے احکامات صادر فرمائیں اور تادم زیست دعا گور ہونگا۔

نوٹ: کورٹ فیصلہ لف ہے۔

عین نوازش ہوگی

مورخہ: 2020-2-13

عارض

Elsh

آپ کا تابع دار مولوی انعام اللہ

سنیر معلم اسلامیات گورنمنٹ ہائیر سیکنڈری سکول آمندی عمر خان ضلع بنوں

موبائل نمبر: 0346-9285872

Forwarded to DDO (M) Bannu for
action please.

PRINCIPAL
G.H.S.S. Amnudi Umar Khan
Bannu

اپیل: بخدمت جناب ڈائریکٹر صاحب ایجوکیشن اینڈ سیکنڈری ایجوکیشن خیبر پختونخواہ پشاور

عنوان: برائے درخواست بنوں ہائی کورٹ بیچ (ریلیف) فیصلے کی روشنی میں

سینئر ٹی۔ ٹی (BPS-16) کے تمام مراعات فراہم کرنے کی استدعا

گزارش کی جاتی ہے کہ فردی سائل 17-04-2014 ڈی۔ پی۔ سی سے اہل ہونے اور سینیارٹی لسٹ سے نمبر 72 پر شامل

ہونے کے باوجود 17-09-2020 تک سینئر ٹی۔ ٹی پر موشن سے محروم چلے آ رہا تھا۔ اپنی محکمہ تعلیم میں کافی حد تک کوشش کی۔

12-08-2015 کے درخواست پر ڈائریکٹر صاحب نے سائل کا پروموشن کا حق تسلیم کیا۔ مگر دفتر ہذا (بنوں) میں کچھ تحفظات ہونے کی

وجہ سے عدالت عالیہ کا دروازہ کھٹکھٹایا اور عدالت نے بھی سائل کے حق میں لکھ کر فیصلہ دیا۔

جناب شان والا: سائل کا تقرری 16-4-2005 ہے۔ بنوں ایجوکیشن آفیس (ٹی۔ ٹی) پوسٹ کی خالی آسامی نہ ہونے کی وجہ

سے 23-04-2009 کو چارج لیا گیا۔ اور سائل کا تنخواہ بھی اسی تاریخ سے ہے۔

جناب شان والا: بنوں دفتر ہذا نے نوٹیفکیشن آرڈر مورخہ 22-12-2020 میں سینیارٹی لسٹ سے دوبارہ نمبر 73 پر شامل

کر کے سینیارٹی بحال کر دیا۔ کاپی لف ہے اور پروموشن دے دیا۔

لہذا آپ صاحب مہربانی فرما کر آرڈر مورخہ 27-5-2014 سے لیکر 22-12-2020 تک سینئر ٹی۔ ٹی (BPS-16) کے

جتنی مراعات ہیں سائل کو دینے کے احکامات فرما دیں اور تادم زیست دعا گور ہوں گا۔

نوٹ: کورٹ فیصلہ لف ہے۔

سروس بک کا فوٹو کاپی لف ہے۔

اور ایل۔ پی۔ سی بھی لف ہے۔

عین نوازش ہوگی

مورخہ: 5-04-2021

اعراض

Abdullah

مولوی انعام اللہ

آپکا تاجدار:

سینئر معلم اسلامیات گورنمنٹ ہائیر سیکنڈری سکول آمنہ عمر خان۔

موبائل نمبر: 0346-9285872

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R-57

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

NOTIFICATION

1. WHEREAS, Mr. Inamullah Khan was appointed against the post of Dinyat Teacher in BPS-06 in Haripur Jail on 2-11-2006 in Jail Department and he took over charge on 11.11.2006. Later on he was transferred to Bannu Jail on 01-12-2006 in his own pay scale.
2. AND WHEREAS, The concerned Dinyat teacher applied for TT post BPS-14 in Education Department Bannu and was appointed on 16-4-2009 under Endst:No:12411-56/AE-III/TT/2009
3. AND WHEREAS, The Jail Department issued LPC on 22-4-2009 and his services were verified upto 22-4-2009 by the concerned Department.
4. AND WHEREAS in DPC Meeting on 17-4-2014 and 10-11-2014 his case for promotion was deferred by the Departmental Promotion Committee being junior one.
5. AND WHEREAS, The DEO(Male) Bannu has submitted letter to this Directorate for guidance regarding the seniority of the complainant vide Endst:No:389 dated 19-01-2015.
6. AND WHEREAS The Director E&SE, K. Pakhtunkhwa has advised to DEO(M) Bannu for counting of seniority of the said teacher w.e.f.23-04-2009 vide letter No:1252/F.No:285/Vol:I/TT/Qari (Male) dated 08-04-2015. The official concerned had drawn his pay and allowance regularly against the post of Dinyat Teacher in Jail Department upto 22-04-2009
7. AND WHEREAS The applicant knocked at the door of court. The Honorable court converted the W.P to appeal and the Appellate authority were directed to decide the case within 30 days.
8. AND WHEREAS, The DEO concerned has exercised the power of the Worthy Director E&SE(Appellate Authority) conducted inquiry in the case
9. AND WHEREAS, the said teacher was promoted to STT BPS=16 on the basis of seniority list on his own turn on 22-12-2020.
10. AND WHEREAS, after promotion to SST on 22-12-2020, the official demanded for back benefits and claim seniority from retrospective effect i.e. from initial appointment in Jail.
11. AND WHEREAS, The enquiry recommends that as the complainant is newly appointed in the Education Department as clear from his appointment order issued vide Endst:No:12411-56/AE/III/TT/2009 dated 16-4-2009 his relieving from Jail Department and taking over charge in Education Department may be given seniority w.e.f.23-04-2009.
12. Now the appellant authority Director Education E&SE, Peshawar has been pleased to regret the appeal in r/o Mr. Inamullah Khan (T.T) for grant of seniority from the date of his first appointment as Dinyat teacher in Jail Department i.e. w.e.f.2-11-2006 under (17)(2)(a) of E&D Rules 2011.

(DIRECTOR)

Endst No. 2032-34 /F.No.285/Vol:II TT/AT-Qari(M). Dated Peshawar the 21/10 /2021.
Copy of the above is forwarded for information and necessary action to the:-

1. The District Education Officer (M) Bannu.
2. District Account Officer Bannu.
3. Official concerned.
4. PA to Director E&SE Khyber Pakhtunkhwa, Peshawar.
5. Master File.

[Signature]
Deputy Director (Establishment)
E&SE Khyber Pakhtunkhwa, Peshawar

[Signature]

VAKALATNAMA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

_____ OF 2021

_____ INMA ULLAH _____

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

_____ Education Department _____

(RESPONDENT)
(DEFENDANT)


I/We _____ INAM ULLAH _____

Do hereby appoint and constitute, **AFRASIAB KHAN WAZIR, 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



CLIENT(S)


ACCEPTED
AFRASIAB KHAN WAZIR
ADVOCATE HIGH COURT

Mobile No. **0312-9888752**