

15.10.2018

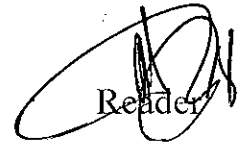
Clerk to counsel for the appellant and Mr. Muhammad Jan learned Deputy District Attorney for the respondent present. Due to general strike of the bar, the case is adjourned. To come up on 21.11.2018 before D.B


Member


Member

21.11.2018

Since 21.11.2018 has been declared as public holiday on account of 12th Rabi-ul-Awal. Therefore, the case is adjourn. To come on 11.01.2019 before D.B.


Reader

11.01.2019

Learned counsel for the appellant present. Mr. Muhammad Jan learned Deputy District Attorney alongwith Wahid Gul AD representative of the respondent department present. copy of appointment/posting order dated 22.12.2017 received and placed on file. Both the Learned counsel for the appellant and learned Deputy Dsitric Attorney stated that since the appellant has been appointed as Naib Qasid vide the aforementioned office order hence the present service appeal has become infructuous. Consequently the present service appeal is hereby dismissed having become infructuous. No order as to costs. File be consigned to the record


Member

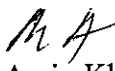

Member


ANNOUNCED.
11.01.2019

Service Appeal No. 828/2014

21.03.2018

Appellant absent. Learned counsel for the appellant, Mr. Ziaullah, Deputy District Attorney for official respondents No. 1 to 3 and private respondent No. 5 in person present. Private respondent No. 4 seeks adjournment on the ground that his counsel is not available today. Adjourned. To come up for arguments on 21.05.2018 before D.B.


(Muhammad Amin Khan Kundi)
Member


(Muhammad Hamid Mughal)
Member

21.05.2018

Clerk to counsel for the appellant and Mr. Ziaullah, DDA for respondents present. Arguments could not be heard due to incomplete bench. Adjourned. To come up for arguments on 26.07.2018 before D.B.


(Muhammad Amin Kundi)
Member

26.07.2018


Due to sickness of learned Member (Executive), further proceedings could not be conducted. Adjourned. To come up for arguments on 27.08.2018 before D.B.


Member

27.08.2018

Clerk of the counsel for appellant and Mr. Kabirullah Khattak, Additional AG for the respondents present. Clerk of the counsel for appellant requested for adjournment. Adjourned. To come up for arguments on 15.10.2018 before D.B.


(Ahmad Hassan)
Member


(Muhammad Amin Khan Kundi)
Member

20.07.2017

Appellant alongwith his counsel present. Mr. Waheed Gul, ADO alongwith Mr. Ziaullah, Deputy District Attorney for official respondents No. 1 to 3 and counsel for private respondent No. 4 also present. Record not submitted. Representative of the department is once again directed to submit all the relevant record positively on the next date. Adjourned. To come up for record and arguments on 22.11.2017 before D.B.

(Gul Zeb Khan)
Member

(Muhammad Amin Khan Kundi)
Member

22.11.2017 Appellant in person present. Mr. Zia Ullah, Deputy District attorney for the respondents present. Appellant requested for adjournment as his counsel is not available. Adjourned. To come up for arguments on 31.01.2018 before D.B.

(Gul Zeb Khan)
MEMBER

(MUHAMMAD HAMID MUGHAL)
MEMBER

31.01.2018

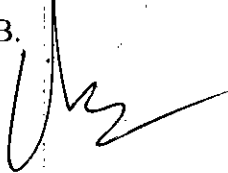
Learned counsel for the appellant and Mr. Zia Ullah, Learned Deputy District Attorney for respondents present. None present on behalf of private respondent. Notice be issued to private respondent and his counsel. Adjourned. To come up for arguments on 21.03.2018 before D.B.

(Muhammad Amin Kundi)
MEMBER

(Muhammad Hamid Mughal)
MEMBER

05.09.2016


Appellant in person and Sarmad Khan, Assistant alongwith Mr. Usman Ghani, Sr.GP for official respondents No. 1 to 3 present. Due to strike of the Bar learned counsel for the appellant is not available today before the Court, therefore, case is adjourned for arguments to ~~9-1-17~~ before D.B.



Member


Member

09.01.2017

Appellant in person, M/S Waheed Gul, ADO (litigation) & Sarmad Khan, Assistant alongwith Additional AG for official respondents 1 to 3 and counsel for private respondent No. 4 present. Due to non-availability of learned counsel for the appellant appeal is adjourned for final hearing before D.B to 16.05.2017.


Member


Chairman

16.05.2017

Clerk of the counsel for appellant and Mr. Ziaullah, District Deputy Attorney for the respondent present. Representative of the respondent department is directed to produce to all relevant record on the next date of hearing. To come up for such record and arguments on 20.07.2017 before D.B.


(Gul Zeb Khan)
Member


(Muhammad Amin Khan Kundi)
Member

10.08.2015

Counsel for the appellant, Dr. Afzal Umer and Muhammad Iltaf, Principal and Muhammad Khurshid, SO alongwith Assistant A.G for official respondents No. 1 to 3 and private respondent No. 4 in person present. Written replies on behalf of respondents No. 1 and 4 alongwith Wakalat Nama submitted, while request for further time made on behalf of respondents No. 2 and 3. To come up for written reply on behalf of respondents No. 2 and 3 on 13.10.2015 before S.B.


Chairman

13.10.2015

Counsel for the appellant, Khurshid Khan, SO alongwith Addl: A.G for official respondents No. 1 to 3 and private respondent No. 4 in person present. Written reply not submitted by respondents No. 2 and 3. Requested for further adjournment. Last opportunity granted to respondents No. 2 and 3 for submission of written reply/comments on 27.10.2015 before S.B.


Chairman

27.1.2016

Counsel for the appellant, M/S Abid Hussain, ADO and Khurshid Khan, SO alongwith Assistant AG for official respondents No. 1 to 3 present. Written reply by respondents No. 2 and 3 submitted while other respondents have already submitted their written statements. The appeal is assigned to D.B for rejoinder and final hearing for 11.5.2016.


Chairman

11.5.2016

Junior to counsel for the appellant and Mr. Hameedur Rahman, A.d alongwith Mr Ziaullah, GP for the respondents present. Rejoinder submitted. Learned counsel for the appellant is stated to be busy in the august Supreme Court of Pakistan. To come up for arguments on 05.09.2016 before D.B.


Member


Chairman

01.06.2015

Counsel for the appellant, Dr. Fazal Rehman, Senior Subject Specialist for respondent No.1 alongwith Asstt: AG and private respondent No. 4 in person present. Representative of respondent No.1 as well as private respondent No.4 requested for time to submit written reply/comments. Notice be issued to respondent No.2 and 3 for submission of written reply/comments. Adjourned to 07.07.2015 for written reply/comments before S.B.



Member

07.07.2015

Appellant in person and Asstt: AG for the respondents present. Written reply not submitted. Learned AAG requested for time to submit written reply/comments. To come up for written reply on 10.08.2015.

Member

Appeal No. 828/2014
Mr. Adil Rahman

6.

24.02.2015

Counsel for the appellant present. Preliminary arguments partly heard. Since the matter required further clarification, therefore, pre-admission notice be issued to the AAG/GP to assist the Tribunal. To come up for preliminary hearing on 30.03.2015.


Member

7.

30.3.2015

Counsel for the appellant and Mr. Ziaullah, GP for the respondents present. Counsel for the appellant submitted that the appellant was appointed on 28.12.2013 as Chowkidar in GHSS, Togh Bala, Kohat against the retired employees son quota. Mr. Khial Zaman submitted complaint No. 820/12 before the Provincial Ombudsman on 28.12.2012 with allegation that his mother had retired from service as Naib Qasid, seeking appointment against retired employees son quota. The aforementioned complaint was disposed of by Ombudsman on 21.2.2013. He further submitted that on the direction of Ombudsman appointment order of the appellant was cancelled on 11.2.2014 and on the same date private respondent No. 4 (Khial Zaman) was appointed in place of the appellant against employees son quota. Feeling aggrieved, the appellant made departmental appeal before the respective departmental authority on 11.2.2014 and 14.2.2014. Having got no response of the said appeal, the appellant submitted the instant appeal seeking intervention of the Service Tribunal by cancellation of the impugned order and restoration of his appointment order.

Appellant Deposited
Security & Process Fee

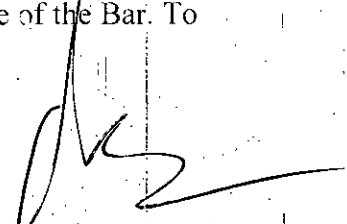


Points raised need consideration. The appeal is admitted for full hearing, subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, fresh notices be issued to all the respondents. Case to come up for written reply on 1.6.2015.


MEMBER


3
21.08.2014

Clerk of counsel for the appellant present. Preliminary arguments could not be heard due to General Strike of the Bar. To come up for preliminary hearing on 21.10.2014.


Member

4.
21.10.2014

Assistant to counsel for the appellant present and requested for adjournment. Request accepted. To come up for preliminary hearing on 29.12.2014.


Member

5.
Reader Note:

29.12.2014

Appellant in person present. Since the Tribunal is incomplete, therefore, case is adjourned 24.02.2015 for the same.




Reader



Form - A
Form of Order Sheet

Court of _____

Case No. 828/2014


S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	10/06/2014	<p>The appeal of Mr. Adil Rehman resubmitted today by Mr. Maazullah Barkandi Advocate may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing</p> <p style="text-align: right;">  REGISTRAR </p>
2	12-6-2014	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>21-8-2014</u></p> <p style="text-align: right;">  CHAIRMAN </p>

The appeal of Mr. Adil Rehman son of Fazal Rehman received today i.e. on 04.06.2014 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Address of respondent no. 4 is incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.

No. 879 /S.T,

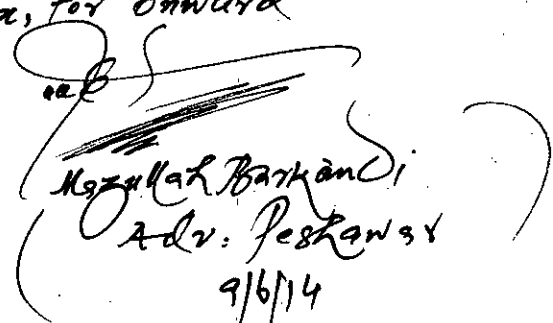
Dt. 05/6 /2014.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Maazullah Barkandi Adv. Pesh.

Sir

1 Re-submitted after correction
and completion, for onward
Process.


Maazullah Barkandi
Adv. Peshawar
9/6/14

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 828 /2014

Adil RehmanAppellant

VERSUS

Principal Government Higher Secondary School,
Togh Bala, Kohat & others.....Respondents

I N D E X

S.No.	Description of documents.	Annexure	Dated
1.	Memo of appeal		1-4
2.	Copy of office order dated 1.02.2014	A	5
3.	Copy of Office order dated 28.12.2013	B	6
4.	Copy of Medical Certificate	C	7
5.	Copy of Charge Report	D	8
6.	Copy of Teachers Attendance Record Register	E	9-10
7.	Copy of SSC Annual DMC	F	11
8.	Copy of Domicile Certificate	G	12
9.	Copy of Letter	I	13-14
10.	Copy of Letter regarding appointment	J	15
11.	Copies of Applications	K Ki	16-17
12.	Wakalatnama		18

عادل رحمان
Appellant

Adil Rehman

Through

Mazullah Barkandi
Advocate, Peshawar

Off: FR-30. 4th Floor
Bilore Plaza,
Peshawar Cantt

Cell: 0300-5875438

Dated: 03.06.2014

①

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 828/2014

828
04/6/2014

Adil Rehman S/o Fazal Rehman

R/o Togh Bala, Tehsil & District Kohat.....Appellant

VERSUS

- 1) Principal Government Higher Secondary School, Togh Bala, Kohat.
- 2) District Education Officer (Male), Kohat.
- 3) Government of KPK, through Secretary Education, Peshawar. 04/6/14
- 4) Khiyal Zaman S/o Fazal Rehman, **chowkidar GHHS Togh Bala Kohat**
R/o Mohallah Semi Khel, Pindi Road, Togh Bala,
Tehsil & District, Kohat.....Respondents

Appeal under Section 4 of the KPK Service Tribunal Act, 1974 against the office order No.626 of respondent No.1 dated 11.02.2014, (Annex "A") whereby the appointment order of the appellant as Clas-IV in GHSS, Togh Bala, Kohat was cancelled.

Prayer

To set aside the impugned order and to re-instate the appellant to his post with all benefits admissible under the rules.

Re-submitted to ~~407~~
and filed.

4/6/14

4/6/14

Respectfully Submitted:-

- 1) That the father of the appellant, namely, Fazal Rehman was retired as a Chowkidar from service in GHHS Togh Bala on 10.12.2013.
- 2) That on his retirement the appellant was appointed as Chowkidar in GHSS, Togh Bala, Kohat vide office endorsement No.596-99 dated 28.12.2013. (Copy annexure "B")
- 3) That the appellant furnished Medical Certificate and took charge on 10.02.2014, and resumed his duty as Chowkidar in the said School. It is worth mentioning that the appellant has passed Matric (SSC) in Grade-B from GSS, Togh Bala, Kohat as regular candidate, with a domicile of Khyber Pakhtunkhwa.
- 4) That it happened so that respondent No.4 (Khyal Zaman), had submitted complaint No.820/12 on 28.12.2012 to the Provincial Ombudsman with the allegation that his mother had retired from service as Naib Qasid in the Education Department in the year 2003 and that he deserves to be appointed on the retired-employees' children quota under the rules. On this complaint, it was ordered that there is no vacant post of Class-IV in Union Council, Togh Bala and when such post is available, respondent No.4 will be considered for appointment. The complaint was disposed-of with these remarks as such.
- 5) That on appointment of the appellant, respondent No.4 re-approached the respondents, on which the appointment of the

appellant was cancelled as per the impugned order dated 11.02.2014 and instead respondent No.4 was appointed as Chowkidar in GHSS, Togh Bala, Kohat.

- 6) That the appellant submitted departmental appeal on 14.02.2014, but there is no reply till date and having no option, now the appellant files this appeal on the following grounds:-

GROUND.

- A. That the appellant has been condemned unheard and has not been given a chance of hearing before cancellation of his appointment order.
- B. That the mother of respondent No.4 has retired on 13.02.2003 as Naib Qasid, while the father of appellant has retired on 10.12.2013 as Chowkidar from Tog Bala, HSS and badge-wise it is the appellant who is to be accommodated on the Chowkidar post and not respondent No.4 in addition to consideration of nomenclature of the post. Hence, the appointment of the appellant on the post of Chowkidar has been illegally cancelled.
- C. That the appellant has not been party in the complaint case before the Provincial Ombudsman nor were real facts brought to the notice of ombudsman, hence, the appointment of the appellant with reference to the order of Ombudsmen, has caused miscarriage of justice.
- D. That the appellant is deserving candidate for the post, as the appellant has passed Matric (SSC) in Grade B, and father of the appellant was Chowkidar in the same School on whose

Mr. Abdul Rehman S/O Fazal Rehman R/O Villages 8 Union Council
Togh Bala Tehsil & District Kohat is hereby appointed as Chowkidar at GHSS
Togh Bala against vacant post on merit basis in BP2-01(4800-150-9300) with
allowance in the interest of public service with effect from date of taking over
charges.

TERMS AND CONDITIONS

1. He will be governed by such rules and regulations as may be issued from time to time by the Govt.
2. His service will be terminated by any time, in case his performance is found unsatisfactory, found any error/fraud he will be processed against under E&D rules 1973.
3. He is required to produce Health and Age Certificate from Medical Authority concerned before taking over charge.
4. He will not be handed over charge if he is under 18 years and above 45 years of age.
5. His service will be considered as regular but without pension and gratuity in terms of amended by Khyber Pakhtunkhwa Civil Servants Amendment Act 2002.
6. He will have to take over charge within 15 days after the issuance of this order otherwise the order will stand null and void.


(ABDUL KHALIQ)
PRINCIPAL GOVT HIGHER SECY SCHOOL
TOGH BALA KOHAT

Enst No. 296-99 dated 28/12/2013

Copy to the:-

1. District Education Officer (Male) Kohat
2. District Accounts Officer Kohat
3. Candidate concerned

PRINCIPAL GHSS TOGH BALA
KOHAT


ATTESTED

(8)

annex
"D"

CHARGE REPORT

Certified that we have on the fore/after Noon of this day respectively made over and received charge of this office .On 10-01-2014 Vide the Principal GHSS Togh Bala Kohat Ednst No 596-99 Dated 28/12/2013

Particulars of cash and important secret and confidential documents handed over are noted on the reverse

Station: GHSS Togh Bala Kohat

Signature of
Relieving (Signature)
Government Servant Adil Rehman
Designation Chowkidar

Signature of Relieved _____
Government Servant : vacant
Designation Chowkidar

Endst No 603-5

Dated 10 / 1 / 2014

- Forwarded to the
- 01 The District Education Officer (Male) Kohat
 02. The District Account Officer Kohat
 - 03 Office Record

(Signature)
Principal
GHSS Togh Bala Kohat

TEACHER'S ATTENDANCE REGISTER

9

For the month of January, 2014

Name: <u>Saman Hazron</u>		Name: <u>Adil Rahman</u>								Name: <u>Ammeel</u>				Name: <u>E</u>			
Designation: <u>Supervisor</u>		Designation: <u>Chowkidar</u>												Designation: <u></u>			
Date	Arr.	Sig.	Dep.	Sig.	Arr.	Sig.	Dep.	Sig.	Arr.	Sig.	Dep.	Sig.	Arr.	Sig.	Dep.	Sig.	Date
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31					b =	كامل	b =	كامل									31

STATEMENT OF LEAVES TAKEN

Leaves	Sick	Casual	Prv.	Total	Sick	Casual	Prv.	Total	Sick	Casual	Prv.	Total	Sick	Casual	Prv.	Total	Leaves
This Month																	This Month
Previous Month																	Previous Month
Total																	Total

ATTESTED

Date: _____ Signature: Headmistress/Headmaster _____ Date: _____

TEACHER'S ATTENDANCE REGISTER

For the month of Feb, 2014

(10)

Name: Adil Rehman Saman Hassan

Designation: Chaukidar Surfer

Date	Adil Rehman				Saman Hassan										
	Arr.	Sig.	Dep.	Sig.	Arr.	Sig.	Dep.	Sig.	Arr.	Sig.	Dep.	Sig.	Arr.	Sig.	Dep.
1	6-	دک	6-	دک											
2	6-	دک	6-	دک											
3	6-	دک	6-	دک											
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STATEMENT OF LEAVES TAKEN

Leaves	Sick	Casual	Prv.	Total	Sick	Casual	Prv.	Total	Sick	Casual	Prv.	Total	Sick	Casual	Prv.	Total
This Month																
Previous Month																
Total																

ATTESTED

Date: _____

Signature: Headmistress/Headmaster _____

S.No. KB 59310

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

Roll No. 16780

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



amere
"F"

KOHAT

(N.W.F.P. Pakistan)

Secondary School Certificate Examination

Session: 2006 - Annual

THIS IS TO CERTIFY THAT Adilur Rehman

Son/Daughter of Fazalur Rehman

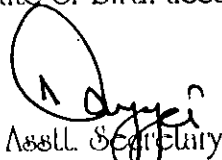
and a student of Govt Higher Secondary School Togh Bala Kohat

has passed the *Secondary School Certificate Examination* of the Board of Intermediate and Secondary Education, Kohat held in March, 2006 as a Regular candidate. He/She obtained 649 Marks out of 1050 and has been placed in Grade B Representing Very Good.

The Candidate passed in the following subjects:

- | | | | |
|----------------|------------|--------------|-----------------|
| 1. English | 2. Urdu | 3. Islamiyat | 4. Pak. Studies |
| 5. Mathematics | 6. Physics | 7. Chemistry | 8. Biology |

Date of birth according to admission form is 17-Mar-1989


Asst. Secretary


ATTESTED


Secretary

This certificate is issued without alteration or erasure.



PROVINCIAL OMBUDSMAN SECRETARIAT,
KHYBER PAKHTUNKHWA.

House No. T-19-13, Salar Lane, Old Bara Road Afzal Abad,
University Town Peshawar.
Office Phone # 091-5846084-85, Fax # 091-5846006
Email: provincialombudsman@gmail.com

13
Annexe
"j"

1	COMPLAINT NO.	P.O/Compliant No.0820/2012
2	NAME & ADDRESS OF THE COMPLAINANT	Khial Zaman S/o Fazal Rehman R/o Mohallah Semi Khel, Pindi Road Togh Bala Tehsil and District Kohat.
3	NAME OF THE AGENCY COMPLAINED AGAINST	1. Secretary, Elementary and Secondary Education, Khyber Pakhtunkhwa Peshawar 2. District Education Officer, Kohat.
4	NAME OF THE INVESTIGATION OFFICER	Arif Kamal (Consultant-I)
5	SUBJECT OF COMPLAINT	Appointment Against Retired Employees Son's Quota.
6	DATE OF REGISTRATION	28/12/2012.
7	DATE OF FINDINGS	21/02/2013

THE COMPLAINT

Complainant Khial Zaman S/o Fazal Rehman has alleged that his mother has retired from Education Department, Khyber Pakhtunkhwa in year 2003, but despite several applications he has not been appointed against the retired employee's children quota. He has requested that District Education Officer Kohat may be directed to appoint him against the quota reserved for the children of retired Class-IV employees.

REPORT OF THE AGENCY

District Education Officer Kohat was called upon to answer the claim of the complainant including rebuttal in terms of section 10(4) of the Khyber Pakhtunkhwa Provincial Ombudsman Act, 2010.

In response, District Education Officer (male) Kohat in his written reply has contended that mother of the complainant has retired as Naib Qasid on 03-02-2003 from Government High School Togh Bala and has added that he is entitled for appointment against retired employees son's quota, but there is no vacant post of Class-IV in Union Council Togh Bala at present and as and when post of Class-IV is available, he will be considered for appointment.

ATTESTED

21/02/2013



DOMICILE CERTIFICATE



Nazim Union Council
Togh Bala-I Kohat

I declare that I was born of parents
who are permanently domiciled in N.W.F.P and having been born in this province.

Mr. / Mrs. / Miss ADIL REHMAN S/O. D/O. W/O FAZAB REHMAN

Was born at Distt: TOGH BALA (KOHAT.) Tehsil KOHAT.

Village / Mohallah TOGH BALA (KOHAT.) Caste

Date: 22-07-2006.

Signature Adil Rehman

In the Pursuance to the above declaration, Dated 22-7-06 filed by ADIL REHMAN

I have been satisfied through verification that the said is born of parents who are permanent residents of Distt KOHAT.

Tehsil KOHAT. N.W.F.P and having been born within it.

It is hereby certified accordingly that the above declaration is true.

ATTESTED

Countersigned
District Officer
Revenue & Estate



Day 15 Month 7 Year 06

No. 15483 Date 22/7/06

Deputy Distt: Officer
Revenue & Estate

جناب عالی!

تقدیریں کی جاتی ہے کہ سی اسماء

ساکن محلہ اگاؤں اشر

صوبہ

اچھے شہری ہیں۔

عادل الرحمن

ولد اختر ازہد

منع کوہاٹ

مکمل تحصیل کوہاٹ

کالک پیدائشی اور مستقل رہائش ہندوستان میں

اور میں ذاتی طور پر جاننا ہوں۔ کداس کے والدین اشر بھی علاقہ مذکورہ کے پیدائشی اور مستقل رہائشی باشندگان ہیں اور یہ کہ

تقدیریں کنندہ کا نام

محمد رفیق

محمد رفیق

محمد رفیق

جناب عالی

محفوظ و سعید اسلام پورٹ عرف ہے کہ سی اسماء

سب تقدیریں از

سندھ صلی سہی فصل کوہاٹ ضلع کی عادت ہے

کے پیدائشی اور مستقل رہائشی باشندگان ہیں۔

شرفان بخش محمد رفیق

محمد رفیق

Muzim Union Council

Togh Bala-I Kohat

تقدیریں کنندہ کا نام

محمد رفیق

محمد رفیق

محمد رفیق

محمد رفیق

محمد رفیق

محمد رفیق



PROVINCIAL OMBUDSMAN SECRETARIAT,
KHYBER PAKHTUNKHWA.

House No. T-1943, Salar Lane, Old Bara Road Afzal Abad,
University Town Peshawar.
Office Phone # 091-5846084-85, Fax # 091-5846006
Email: provincialombudsman@gmail.com

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REJOINDER

Written reply of the Agency was communicated to the complainant for his feedback. In response, the complainant expressed satisfaction on the reply of the Agency and agreed to wait for his turn.

FINDINGS

The complainant has expressed satisfaction on the response of the Agency and has agreed to wait for his turn, therefore, the complaint in hand is disposed of as having borne fruit in terms of Regulation 10 (2) of the Khyber Pakhtunkhwa Provincial Ombudsman Office (Registration, Investigation and Disposal of Complaints) Regulations, 2011. However, District Education Officer (male) Kohat shall consider him against 25% reserved quota in terms of the rules and policy of the provincial Government provided he fulfills the requirements of the post.

ATTESTED


27.2.2013
(BADSHAH GUL WAZIR)
Provincial Ombudsman,
Khyber Pakhtunkhwa.

Regd

15

321
4/2/13

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KOHAT

No. 329 dated 31/01/2013

Annexe
"J"

To

The Provincial Ombudsman
Khyber Pakhtunkhwa Peshawar

Subject:- APPOINTMENT AGAINST EMPLOYEE SON,S QUOTA

Memo:-

Reference your letter No.0820/2012/207 dated 22/01/2013, No.0820/2012 dated 31/12/2012 & No.331/12/2012 on the above cited subject.

The applicant's mother has been retired from service on 03-02-2003 from Govt High School Togh Bala as N/Qasid

He is entitled for appointment against 25% retired son's quota, but there is no available vacant post of Class iv in U/C Togh Bala at present time.

Hence as and when the post of class iv is vacated he may be appointed at earliest please.

Reference your letter No. 3020/13
DISTRICT EDUCATION OFFICER
(MALE) KOHAT

Endst.No. _____

Copy to the:-

1. PS to Secretary Education Khyber Pakhtunkhwa Peshawar
2. The Director Elementary & Secondary Edu Khyber Pakhtunkhwa Peshawar

DISTRICT EDUCATION OFFICER
(Male) Kohat

Conceded 1.0

AS

4-2-2013

ATTESTED

خدمت جناب ڈائریکٹر وزیر اعلیٰ شکایت سیل صوبہ خیبر پختونخواہ

(16)

حصول انصاف بابت آسامی چوکیدار بمقام گورنمنٹ ہائیر سیکنڈری سکول توغ بالا کوہاٹ

عنوان درخواست

Annex
"K"

جناب عالی:

مودبانہ گزارش ہے۔ کہ میرا تعلق ایک انتہائی غریب خاندان سے ہے میرے چار چھوٹے چھوٹے بہن بھائی ہیں۔ جبکہ گھر کا سارا گزار بسر والد کی تنخواہ سے پورا ہوتا تھا۔ جو گورنمنٹ ہائیر سیکنڈری سکول توغ بالا میں چوکیدار تھا۔ جو 10 دسمبر 2013 کو ملازمت سے ریٹائر ہو گئے تھے۔ والد کی ریٹائرمنٹ کے بعد ایجوکیشن ڈیپارٹمنٹ کے مروجہ اصولوں کے مطابق سکول ہذا کے پرنسپل نے خالی آسامی کو پُر کرنے کیلئے 16 دسمبر 2013ء کو اشتہار دیا۔ جس میں کئی امیدواروں نے درخواستیں مطلقہ پرنسپل کے پاس جمع کرائیں۔ کئی امیدواروں کے مکمل انٹرویو اور جانچ پڑتال کے بعد سلیکشن کمیٹی نے مجھے بحیثیت چوکیدار منتخب کیا اور مجھے باقاعدہ سلیکشن لیٹر نمبر 99-596 تاریخ 28 دسمبر 2013ء حوالے کیا۔ بعد ازاں میں نے اپنے عہدے کا باقاعدہ چارج 10 جنوری 2014ء کو سنبھالا اور اب تک خندہ پشانی سے اپنے فرائض سرانجام دے رہا ہوں تھا کہ حلقہ ایم پی اے کے دباؤ پر اور سیاسی اثر و رسوخ کی وجہ سے میری ملازمت کو ختم کر دیا گیا ہے احوال کچھ یوں ہے کہ 2002 میں گورنمنٹ ہائیر سیکنڈری سکول توغ بالا میں ایک خاتون بحیثیت چڑا سی بھرتی تھی۔ اُس کی ریٹائرمنٹ کے بعد اُس کا بیٹا خیال زمان جو مختلف جرائم جن میں قتل اغواہ کے سلسلے میں جیل میں بند تھا۔ کئی سالوں کی قید و بند کے بعد جب وہ رہا ہوا تو اس نے ماں کی جگہ پر بھرتی ہونے کیلئے تعلیمی ادارہ سے رابطہ کیا لیکن اسکی ماں کی ریٹائرمنٹ سے خالی ہونے والی آسامی پُر تھی تو اس نے صوبائی محتسب سے رجوع کیا جس پر صوبائی محتسب نے ایجوکیشن ڈیپارٹمنٹ کیلئے ہدایت کی کہ اس کو تعلیمی ادارہ میں کسی بھی سکول میں ایڈجسٹ کیا جائے لیکن آرڈر کی تاریخ سے لیکر اب تک سیکٹروں آسامیاں خالی ہوئیں۔ لیکن اسکو اس کے اخلاق اور جرائم پیشہ ہونے کی وجہ سے کہیں بھی تعینات نہیں کیا گیا۔

یونین کونسل توغ دن کے گورنمنٹ پرائمری سکول بوائز نمبر 19 اکتوبر 2013ء کو ریٹائر ہوئے۔ اس کی جگہ خیال زمان نے اس سکول میں بحیثیت چوکیدار تین مہینے تک کام کیا۔ خفیہ طور پر اس کا آرڈر بھی ہوا۔ لیکن نامعلوم وجوہات کی بناء پر اس خالی ہونے والی آسامی پر حلقہ ایم پی اے کی سیاسی مداخلت کی بناء پر ایم پی اے کی چہیتے امیدوار نور محمد کا آرڈر کیا گیا ہے۔ جو اس پوسٹ کیلئے قطعی موزوں نہیں ہے۔ اب جو آدمی صوبائی محتسب کا آرڈر لے کر میرے پیچھے پڑا ہوا ہے۔ اس کو تعلیمی ادارہ میرے والد کی ریٹائرمنٹ سے قبل خالی ہونے والی آسامی یعنی گورنمنٹ پرائمری سکول بوائز نمبر توغ بالا میں تعینات کیا جاسکتا تھا۔ کیونکہ عبوری طور پر یہاں پر خیال زمان نے تین مہینے کام بھی کیا ہے۔ لیکن اب اُس کو میری جگہ پر میرا آرڈر کینسل کر کے لگا دیا گیا ہے۔

عرض یہ ہے۔ کہ مجھے بحیثیت چوکیدار گورنمنٹ ہائیر سیکنڈری سکول توغ بالا میں کام کرنے دیا جائے۔ کیونکہ میرا آرڈر اصولوں کے مطابق ہوا ہے۔ اس بابت مجھے پورا انصاف ملنا چاہیے۔ مجھے قوی امید ہے۔ کہ وزیر اعلیٰ خیبر پختونخواہ میری اس ملازمت کو تحفظ دینگے۔ تاکہ میں اپنے معمر والدین اور چھوٹے چھوٹے بہن بھائیوں کی کفالت کر سکوں۔ اور اپنی زندگی کے قیمتی ایام تعلیمی مقدس پیشے میں صرف کر سکوں اس مہربانی پر میں ساری عمر آپ کیلئے دُعا گو رہوگا۔

شکریہ!

مورخہ: 11-02-2014

آپ کا تابعدار عادل رحمن ولد فضل رحمن چوکیدار گورنمنٹ ہائیر سیکنڈری سکول توغ بالا کوہاٹ

ATTESTED

موبائل نمبر سرپرست اعلیٰ: 0336-0093293

0300-5651854

بخدمت جناب سیکرٹری ایجوکیشن اینڈ ایلمنٹری ایجوکیشن پشاور

عنوان درخواست: حصول انصاف بابت آسامی چوکیدار بمقام گورنمنٹ ہائر سیکنڈری سکول توغ بالا کوہاٹ

جناب عالی!

مودبانہ گزارش ہے کہ میرا تعلق ایک انتہائی غریب خاندان سے ہے میرے چار چھوٹے چھوٹے بہن بھائی ہیں۔ جبکہ گھر کا سارا بسروالدہ پورا ہوتا تھا۔ جو گورنمنٹ ہائر سیکنڈری سکول توغ بالا میں چوکیدار تھے۔ جو 10 دسمبر 2013ء کو ملازمت سے ریٹائر ہو گئے تھے۔ والد کی ریٹائرمنٹ کے کیشن ڈیپارٹمنٹ کے مروجہ اصولوں کے مطابق سکول ہذا کے پرنسپل نے خالی آسامی کو پُر کرنے کے لئے 16 دسمبر 2013ء کو اشتہار دیا۔ جس امیدواروں نے درخواستیں مطلقہ پرنسپل کے پاس جمع کرائیں۔ کئی امیدواروں کے مکمل انٹرویو اور جانچ پڑتال کے بعد سلیکشن کمیٹی نے مجھے محثیت چوکیدار کیا اور مجھے باقاعدہ سلیکشن لیٹر نمبر 99-596 تاریخ 28 دسمبر 2013ء حوالے کیا۔ بعد ازاں میں نے اپنے عہدے کا باقاعدہ چارج 10 جنوری 2014ء سنبھالا اور اب تک خندہ پیشانی سے اپنے فرائض سرانجام دے رہا تھا کہ حلقہ ایم پی اے کے دباؤ پر سیاسی اثر و رسوخ کی وجہ سے میری ملازمت ختم کر دی گئی۔ احوال کچھ یوں ہے کہ 2002ء میں گورنمنٹ ہائر سیکنڈری سکول توغ بالا میں ایک خاتون محثیت چپڑا اسی بھرتی تھی۔ اُس کی ریٹائرمنٹ کے بعد اُس کا بیٹا خیال زمان جو مختلف جرائم جن میں قتل اغواء کے سلسلے میں جیل میں بند تھا۔ کئی سالوں کی قید و بند کے بعد جب وہ رہا ہوا تو اُس نے والدہ کی جگہ پر بھرتی ہونے کے لئے تعلیمی ادارہ سے رابطہ کیا لیکن اُسکی والدہ کی ریٹائرمنٹ سے خالی ہونے والی آسامی پر تھی تو اس نے صوبائی محتسب سے رجوع کیا جس پر صوبائی محتسب نے ایجوکیشن ڈیپارٹمنٹ کے لئے ہدایت کی کہ اس کو تعلیمی ادارہ میں کسی بھی سکول میں ایڈجسٹ کیا جائے لیکن آرڈر کی تاریخ سے لے کر اب تک سینکڑوں آسامیاں خالی ہوئیں۔ لیکن اس کو اس کے اخلاق اور جرائم پیشہ ہونے کی وجہ سے کہیں بھی تعینات نہیں کیا گیا۔

یونین کونسل توغ بالا وں کے گورنمنٹ پرائمری سکول بوائز نمبر 10 سے ایک چوکیدار گل جنان 10 اکتوبر 2013ء کو ریٹائر ہوئے اس کی جگہ خیال زمان نے اس سکول میں محثیت چوکیدار تین مہینے تک کام کیا۔ خفیہ طور پر اس کا آرڈر بھی ہوا۔ لیکن نامعلوم وجوہات کی بناء پر اس خالی ہونے والی آسامی پر حلقہ ایم پی اے کے سیاسی مداخلت کی بناء پر ایم پی اے کے چینیٹے امیدوار نور محمد کا آرڈر کیا گیا ہے۔ جو اس پوسٹ کے لیے قطعی موزوں نہیں ہے۔ اب جو آدمی صوبائی محتسب کا آرڈر لے کر میرے پیچھے پڑا ہوا ہے۔ اُس کو تعلیمی ادارہ میرے والد کی ریٹائرمنٹ سے قبل خالی ہونے والی آسامی یعنی گورنمنٹ پرائمری سکول بوائز نمبر 10 توغ بالا میں تعینات کیا جاسکتا تھا۔ کیونکہ عبوری طور پر یہاں پر خیال زمان نے تین مہینے کام بھی کیا ہے۔ لیکن میرا آرڈر 11 فروری کو کنسل کر کے اُسے میری جگہ لگا دیا۔

عرض یہ ہے کہ مجھے محثیت چوکیدار گورنمنٹ ہائر سیکنڈری سکول توغ بالا میں کام کرنے دیا جائے۔ کیونکہ میرا آرڈر اصولوں کے مطابق ہوا ہے۔ اس بابت مجھے پورا انصاف ملنا چاہئے۔ مجھے قوی امید ہے کہ ڈائریکٹر سیکنڈری ایجوکیشن پشاور میری اس ملازمت کو تحفظ دینگے تاکہ میں اپنے معمر والدین اور چھوٹے بہن بھائیوں کی کفالت کر سکوں اور اپنی زندگی کے قیمتی ایام تعلیمی مقدس پیشے میں صرف کر سکوں اس مہربانی پر میں ساری عمر آپ کے لئے دعا گو رہوں گا۔

شکر یہ

مورخہ: 14-02-2014

آپ کا تابعدار عادل رحمن ولد فضل رحمن چوکیدار گورنمنٹ ہائر سیکنڈری سکول توغ بالا کوہاٹ

موبائل نمبر سرپرست اعلیٰ شوکت: 0336-0093293

0300-5651854

ATTESTED

True Copy

کاپی برائے:

- 1- DEO(M) کوہاٹ
- 2- سیکنڈری ایجوکیشن ڈائریکٹر KPK
- 3- کمشنر کوہاٹ ڈویژن کوہاٹ
- 4- DC کوہاٹ ضلع کوہاٹ
- 5- وزیر اعلیٰ پرویز خٹک KPK
- 6- ایجوکیشن منسٹر عاطف KPK

بعدالت حیدر خٹو نوحو اسروس ٹریڈ بزنس

لیٹاؤر
SA NO =

2014 پنجاب عادل
ولا فضل
سے نوح مال
کے صلہ کو

3 جون
ماہ برسیل گھر حفظ مال
سکندری سول نوح مال
کے صلہ کو صلہ

مورخہ
مقدمہ
دعویٰ
جرم

باءت تحریر آنگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ
آن مقام لیٹاؤر کیلئے محاذ اقدار قادی کے
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخ
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جائے التوائے مقدمہ کے سبب سے ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکور کریں۔ لہذا ادکالت نامہ لکھ دیا کہ سند ہے۔

المرقوم 3 ماہ جون 2014

عادل الرحمن

14301-9988091-9

کے لئے منظور ہے۔

Accepted
Kamal Bank
Adv. Raja

عادل
نوح مال کے صلہ کو صلہ
بمقام

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

FD 11

No.

APPEAL No. 828 of 20 11.

Adil Rehman

Appellant/Petitioner

Versus

Principal G H S S Togh Balu Kohat

RESPONDENT(S)

Notice to Appellant/Petitioner

AAG

AAG

Service Tribunal

Peshawar

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 30-3-2015 at Peshawar.

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

Adil
28/2

[Signature]

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. 828/2014

Adil Rehman.....Appellant

VERSUS

The Principal Govt, Higher Secondary School Togh Bala Kohat and 3
others.....Respondents

REPLY ON BEHALF OF RESPONDENT NO. 4
(KHIYAL ZAMAN) TO THE AVERMENTS OF
APPELLANT IN THE TITLED SERVICE APPEAL

Respectfully Sheweth,

Reply on behalf of respondent No. 4 (Khiyal Zaman) to the titled
service appeal is submitted hereunder.

Preliminary Objection:

1. That the appellant has no cause of action against the answering of
respondent No. 4 (Khiyal Zaman).
2. That the appointment of answering respondent No. 4 (Khiyal Zaman)
has been made by the official respondents strictly in accordance with
the law of the land.
3. That the appellant has himself admitted in the connected service
appeal No.827/2014 that mother of respondent retired in 2003 and
father of appellant retired in 2013, hence respondent No. 4 deserved
his appointment earlier than the appellant.
4. That the service appeal of appellant is not maintainable and he has no
locus standie to file service appeal.

ON FACTS:

- A. Para No. 1 is admitted correct per my knowledge.

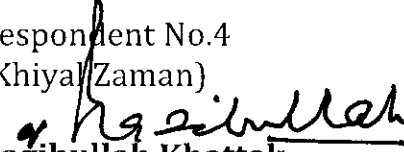
- B. Para No. 2 is correct but his appointment was illegal as result of which the appellat services were terminated during probationary period.
- C. Para No. 3 is liable to proved.
- D. Para No. 4 is correct to the extent that respondent No. 4 moved complaint before the worthy provincial Ombudsman that appointment of appellat is in violation of law as his mother retired from service in 2003 and appellat father retired in 2013.
- E. Para 5 is also correct. The official respondent passed legal order of appointment of respondent No. 4 and cancelled their unlawful order of appointment of the appellat.
- F. Para No. 6 pertains to official respondents.

GROUNDS:

1. Incorrect. The appellat appointment order was cancelled during probationary Period strictly in accordance with the terms and conditions of this appointment order.
2. Correct to the extent that mother of respondent No. 4 superannuated on 13-02-2003 and father of appellat on 10-12-2013. Naib Qasid and chowkidar are all class IV employees.
3. Para C is correct ~~that~~ it was not necessary to implead the appellat in the complaint before provincial Ombudsman.
4. Para No. E pertains to official respondents.
5. Para No. D is totally incorrect, hence denied.


It is, therefore, humbly submitted that the titled service appeal is devoid of any legal force, may graciously be dismissed with costs.


Dated: 05/08/2015

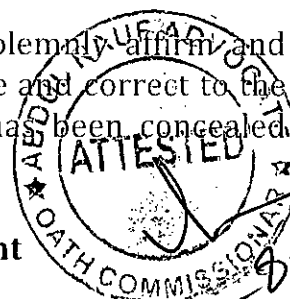
Respondent No.4
(Khiyal Zaman)
Through 
Nagibullah Khattak
Advocates High Court,
Peshawar.

AFFIDAVIT:

I, Khiyal Zaman respondent No. 4 do hereby solemnly affirm and declare on oath that the contents of reply are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.


10/8/15


Deponent


OATH COMMISSIONARY
10-8-15

Before the Honourable Service Tribunal Peshawar

Appeal No 827,828/2014

Mr. Adil Rehman S/o Fazal Rehman r/o Togh Bala Kohat
Appellant

VERSUS

1. Principal Govt Higher Secondary School Togh Bala (Kohat)
Respondent
2. District Education officer (M) Kohat

RESPECTFULLY SHEWTH

Para wise comments on behalf of principal GHSS Togh Bala Kohat are as Under:-

Preliminary Objections:-

- A. That appeal has no cause of action.
- B. That appeal has no locus standi.
- C. That appeal is time- barred.
- D. That appeal is based on prejudice.
- E. That appeal is just an interference in administrative affairs.

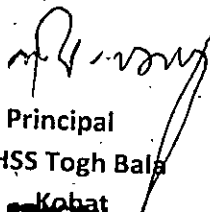
Facts:-

1. Incorrect, the petitioner has no right to be heard at the time of cancellation of appointment order as per government procedure,
 2. Incorrect, there is no distinction between the post of class IV for appointment.
 3. Incorrect, the Honourable ombudsman is independent in decisions and implementation of his decision is binding upon government departments.
 4. Incorrect, the respondent No.4 was the deserving candidate because his mother retired earlier than the father of appellant.
 5. Incorrect, the then principal being competent exercised his powers, following the merit policy, appointed respondent No.4, the most deserving candidate under the laws.
- Any other ground which is not taken may kindly be allowed at time of arguments.
Hence it is prayed that the appeal may be set aside and respondent No.4 may be allowed to continue his service.

Annexe "A". Appointment Order

Annexe "B". Court Decision under complaint No.0820/2012

Annexe "C". Appointment against employee son's quota


Principal
GHSS Togh Bala
Kohat
Principal
GHSS Togh Bala
Kohat

5

Annex
"A"

OFFICE OF THE PRINCIPAL GHSS TOGH BALA KOHAT

APPOINTMENT ORDER

As per judgment of Honorable Provincial Ombudsman Khyber Pakhtunkhwa Peshawar under complaint No 0820/2012 and further direction by D.E.O (M) Kohat vide No 595 Dated 11-02-2014 Mr. Khyal Zaman S/O Fazal Rehman Resident of Vill: Togh Bala Kohat is hereby appointed as Chowkedar in B.P.S-01(4800-150-9300) with immediate effect on the following terms and conditions.

- 1: He will be governed by such rules and regulations as may be issued from time to time by the government.
- 2: His services will be terminated by any time incase his performance is found unsatisfactory//found any error/fraud, he will be proceeded under E&D rules 1973.
- 3: He is required to produce health & Age certificate from Medical authority concerned before taking over charge.
- 4: He will not have cover charge if he is under 18 Years and above 45 Years age.
- 5: His service will be considered as regular but without pension and gratuity in term of Khyber Pakhtunkhwa civil servant amendment act 2005.
- 6: He will have to take over charge within 15 days after the issuance of this order otherwise the order will stand null & void.


(ABDUL KHALIQ)
PRINCIPAL GOVT HIGHER SECY SCHOOL
TOGH BALA KOHAT

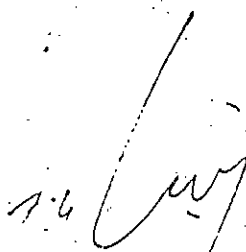
Endst, No. 628-31

Dated 11 / 1 / 2 / 2014

Copy to:

1. District Education Officer (Male) Kohat
2. District Account Officer Kohat
3. Provincial Ombudsman Khyber Pakhtunkhwa Peshawar.
4. Candidate Concerned


ATTESTED


Principal
GHSS Togh Bala
Kohat

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) KOHAT

No. 607 / 2014 / Appd File

Dated: 11 / 02 / 2014

To

The Principal
GHSS Togh Bala
Kohat

Subject:

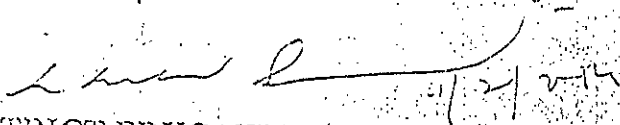
COURT DECISION UNDER COMPLAIN NO. 0820 / 2012

Memo

Reference your letter no. 607 Dated: 10.02.2014 in the above cited subject

You are directed to implement the judgment of honourable Ombudsmen Khyber Pakhtunkhwa Peshawar and to honour the recommendation of enquiry officer without any further loss of time to appoint Mr. Khyal Zaman S/o Fazal Rehman. (enquiry report is attached for ready reference)

Moreover, cancellation / stand a previous order in respect of Mr. Adil Rehman S/o Fazal Rehman in your jurisdiction being a competent appointing authority.


DISTRICT EDUCATION OFFICER (M)
KOHAT

PROVINCIAL OMBUDSMAN SECRETARIAT
KHYBER PAKHTUNKHWA

House No. T-1943, Salar Lane, Old Bara Road Afzal
Abad University Town Peshawar.
Office Phone # 091-5846084-85 Fax # 091-5846006
Email: provinciombudsman@gmail.com

REJOINDER:

P.O/Complaint No. 0820/2012/mob Dated Peshawar the, 12/02/2013

To

Mr. Khayal Zaman S/o Fazal Rehman,
R/o Monallah Sami Khel Pindi Road Togh Bala,
Tehsil and District Kohat

Subject: APPOINTMENT AGAINST EMPLOYEE SON'S QUOTA.

The reply of the Agency (Office of the District Education Officer
(Male) Kohat) No. 209, dated: 31/01/2013 received to this office is
enclosed for your perusal and rejoinder on or before 21/02/2013
positively, failing which it will be presumed that you have no
objection on the report of the Agency

THIS ISSUES WITH THE APPROVAL OF THE KHYBER PAKHTUNKHWA OMBUDSMAN.

(Consultant-i)
Provincial Ombudsman Secretariat
Khyber Pakhtunkhwa,
Peshawar.

Regd.

331
22/13

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KOHAT

No. 309 dated 31/01/2013

To

The Provincial Ombudsman
Khyber Pakhtunkhwa Peshawar.

Subject:- APPOINTMENT AGAINST EMPLOYEE SON'S QUOTA

Memo:-

Reference your letter No.0820/2012/207 dated 22/01/2013, No.0820/2012 dated 31/12/2012 & No.331/12/2012 on the above cited subject.

The applicant's mother has been retired from service on 03-02-2003 from Govt High School Togh Bala as N/Qasid

He is entitled for appointment against 25% retired son's quota, but there is no available vacant post of Class iv in W/C Togh Bala at present time.

Hence as and when the post of class iv is vacated he may be appointed at earliest please.

Reference your letter No.0820/2012/207
DISTRICT EDUCATION OFFICER
(MALE) KOHAT

Endst.No. _____

Copy to the:-

1. PS to Secretary Education Khyber Pakhtunkhwa Peshawar
2. The Director Elementary & Secondary Edu Khyber Pakhtunkhwa Peshawar available vacant post

Consent 1.0
4-2-2013

DISTRICT EDUCATION OFFICER
(Male) Kohat

DISTRICT EDUCATION OFFICER



PROVINCIAL OMBUDSMAN SECRETARIAT
KHYBER PAKHTUNKHWA.

House No.1943, Safar Lane, Old Bara Road,
University Town Peshawar.
Office Phone # 091-5846084-85, Fax # 091-5846006.
Email: provinciombudsman@gmail.com

P O/Complaint No.0820/2012

Dated: 19/03/2013

To


1. The Secretary,
Elementary and Secondary Education Department,
Khyber Pakhtunkhwa, Peshawar.
2. The District Education Officer,
Kohat.
3. Mr. Khail Zaman S/o Fazal Rehman,
R/o Mohallah Semi Khel, Pindi Road Togh Bala,
Tehsil and District Kohat.

Subject: APPOINTMENT AGAINST RETIRED EMPLOYEE SON'S QUOTA.

Memo:

Copy of the Finding of the Provincial Ombudsman Khyber Pakhtunkhwa on the subject noted above is enclosed herewith for information and necessary action.

Under section 31 of the Khyber Pakhtunkhwa Provincial Ombudsman Act, 2010, the aggrieved person can file representation to the Governor Khyber Pakhtunkhwa within thirty days if so desired.


Anif Kamal (Consultant-I)
Provincial Ombudsman Secretariat,
Khyber Pakhtunkhwa,
Peshawar.

ENDST. EVEN NO & DATE:

Copy forwarded to the i/c Computer Section Provincial Ombudsman Secretariat Khyber Pakhtunkhwa alongwith finding in duplicate for updating record under Regulation 19 of the Khyber Pakhtunkhwa Provincial Ombudsman Office (Registration, Investigation and Disposal of Complaints) Regulation, 2011.

Anif Kamal (Consultant-I)
Provincial Ombudsman Secretariat,
Khyber Pakhtunkhwa,
Peshawar.



PROVINCIAL OMBUDSMAN SECRETARIAT,
KHYBER PAKHTUNKHWA.

House No. T-1943, Salar Lane, Old Bana Road ATZA, Peshawar,
University Town Peshawar.
Office Phone # 091-5846084-85, Fax # 091-5846006
Email: provincialombudsman@gmail.com

1	COMPLAINT NO.	P.O/Compliant No.0820/2012
2	NAME & ADDRESS OF THE COMPLAINANT	Khial Zaman S/o Fazal Rehman R/o Mohallah Semi Khel, Pindi Road Togh Bala Tehsil and District Kohat
3	NAME OF THE AGENCY COMPLAINED AGAINST	1. Secretary, Elementary and Secondary Education, Khyber Pakhtunkhwa Peshawar 2. District Education Officer, Kohat.
4	NAME OF THE INVESTIGATION OFFICER	Arif Kamal (Consultant-I)
5	SUBJECT OF COMPLAINT	Appointment Against Retired Employees Son's Quota.
6	DATE OF REGISTRATION	28/12/2012.
7	DATE OF FINDINGS	21/02/2013

THE COMPLAINT

Complainant Khial Zaman S/o Fazal Rehman has alleged that his mother has retired from Education Department, Khyber Pakhtunkhwa in year 2003, but despite several applications he has not been appointed against the retired employee's children quota. He has requested that District Education Officer Kohat may be directed to appoint him against the quota reserved for the children of retired Class-IV employees.

REPORT OF THE AGENCY

District Education Officer Kohat was called upon to answer the claim of the complainant including rebuttal in terms of section 10(4) of the Khyber Pakhtunkhwa Provincial Ombudsman Act, 2010.

In response, District Education Officer (male) Kohat in his written reply has contended that mother of the complainant has retired as Naib Qasid on 03-02-2003 in Government High School Togh Bala and has added that he is entitled for appointment against retired employees son's quota, but there is no vacant post of Class-IV in Union Council Togh Bala at present and as and when post of Class-IV is available, he will be considered for appointment.



PROVINCIAL OMBUDSMAN SECRETARIAT,
KHYBER PAKHTUNKHWA.

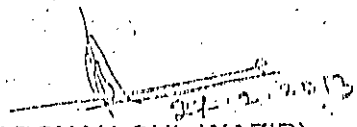
House No. T-1943, Salar Lane, Old Bara Road Afzal Abad,
University Town Peshawar.
Office Phone # 091-5846084-85, Fax # 091-5846006.
Email: provincialombudsman@gmail.com

REJOINDER

Written reply of the Agency was communicated to the complainant for his feedback. In response, the complainant expressed satisfaction on the reply of the Agency and agreed to wait for his turn.

FINDINGS

The complainant has expressed satisfaction on the response of the Agency and has agreed to wait for his turn, therefore, the complaint in hand is disposed of as having borne fruit in terms of Regulation 10 (2) of the Khyber Pakhtunkhwa Provincial Ombudsman Office (Registration, Investigation and Disposal of Complaints) Regulations, 2011. However, District Education Officer (Male) Peshawar shall register him against 25% reserved quota in terms of the rules and policy of the provincial Government provided he fulfills the requirements of the post.


(BADSHAH GUL WAZIR)
Provincial Ombudsman,
Khyber Pakhtunkhwa.

**PROVINCIAL OMBUDSMAN SECRETARIATE,
KHYBER PAKHTUNKHWA, PESHAWAR**

Overseas Pakistani Foundation Building Phase-V
Near NADRA Head Office, Hayatabad, Peshawar
Office Phone # 091-9219531-32, Fax # 091-9219526
Email: provincialombudsman@gmail.com

Complaint No. 0820/2012

5277-78

Dated: 12/11/2013

To,

The District Education Officer (Male)
District Kohat

Subject:

APPOINTMENT AGAINST RETIRED EMPLOYEES SON'S QUOTA

Dear Sir,

I am directed to refer to this Secretariat complaint No. 0820/2012 dated: 21/02/2013 on the subject noted and to enclose application submitted by Khyal Zaman (complainant) for your views/comments please.

I am further directed to state that compliance/implementation report in the subject complaint is still awaited which shall be furnished to this Secretariat at the earliest.

THIS ISSUES WITH THE APPROVAL OF THE PROVINCIAL OMBUDSMAN.

[Signature]
Assistant Director
(Implementation),
Provincial Ombudsman Secretariat,
Khyber Pakhtunkhwa,
Peshawar.

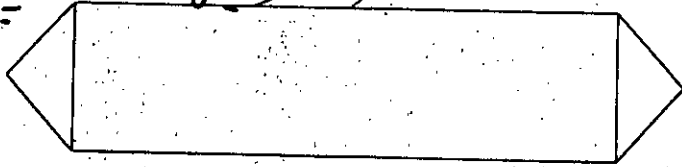
Endst: of even No. & date:

Copy forwarded to:

1. Secretary (E&SE) Department Khyber Pakhtunkhwa, Peshawar.
2. P.S to Provincial Ombudsman, Khyber Pakhtunkhwa.

sd-
Assistant Director
(Implementation),
Provincial Ombudsman Secretariat,
Khyber Pakhtunkhwa,
Peshawar.

بعد الت صرور سٹریٹل KPK لٹیاو



4

2015ء منجانب صالحہ رضا دیسائندہ

بنام پرنسپل گورنمنٹ ٹیچنگ کالج
سکول ٹیچنگ بلاک کالج
رور حیدر

5 ماہ اگست

علیہ رحمہ

صرور سٹریٹل 828

موریخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی وجواب دہی وکل کاروائی متعلقہ
آن مقام لٹیاو کیلئے نصاب صاحب ریڈ وکٹ لٹیاو اور انڈر وکٹ لٹیاو اور انڈر وکٹ لٹیاو
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ پر حلف دینے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور وصولی چیک دروپہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی
اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت
مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے
تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے
اور اس کا ساختہ پرداخت منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے
سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں
گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

Handwritten signature on the right side of the document.

2015

5 ماہ اگست

المرقوم

العوانہ العوانہ العوانہ

Attested & accepted by: *Qasimullah Peshawar*
Advocate

مقام
Roze Khan
Advocate Peshawar

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ
الحمد لله الذي هدانا لهذا
ما كنا لنهتدي لولا أن هدانا الله

215

الحمد لله الذي هدانا لهذا

ما كنا لنهتدي لولا أن هدانا الله

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

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الحمد لله الذي هدانا لهذا
ما كنا لنهتدي لولا أن هدانا الله

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

SERVICE APPEAL No.827, 828/2014

1. Adil Rehman S/O Fazal Rehman R/O Togh Bala Tehsil & District Kohat

Petitioner

VERSUS

1. Principal GHSS Togh Bala Kohat & Others

Respondents

RESPCETFULLY SHEWTH:

Para wise comments on behalf of Respondents No.2 to 3 are as under:-

Preliminary Objections:-

1. That the appellant has got no cause of action.
2. That the appellant ha no locus standi
3. That the appeal is barred by time
4. That the appeal is not maintainable in its present form
5. That the appellant has not come with clean hands to Honorable Service Tribunal Peshawar

Facts:-

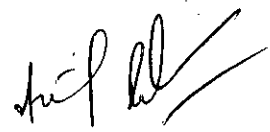
1. Admitted
2. Admitted to the extent that he was appointed as Class-iv but as Mr.Khyal Zaman was senior to him i.e. his mother retired on 13-02-2003 .Feeling aggrieved he submitted appeal to Provincial Ombudsman who directed this office to appoint him on merit. This office issued direction to the principal concerned to withdraw the said order No.596-99 dated 28-12-2013 Hence this order was cancelled and appointment order issued on merit (Annexure A & B)
3. Admitted to the extent that Medical Certificate and Charge was taken, but rest of para is not concerned.

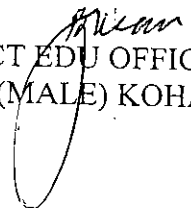
4. That Mr.Khyal Zarnan was on merit top position due to his mother retired from N/Qasib post on 13-02-2003 from this School as compared to the Appellant, i.e respondent No.4,also provincial Ombudsman Passed judgment in his favour, so he was appointed (Annexure C-F)
- 5 That the appointment order of appellant was issued mistakenly by the Principal concerned that is why his order was cancelled/withdrawn (Annexure B)
6. As and when the post class-iv is available in his Union Council, he will be considered for appointment as per policy

GROUNDS:-

- (A) Not correct as stated that the appellant had no right to be heard at the time of cancellation of appointment order as per Govt procedure.
 - (b). Not correct as stated that there is no distinction between the posts of Class-iv for appointment.
 - (c). Not concerned, Hence no comments
 - (d). Not concerned, that respondent No.4 was the deserving candidate because his mother retired earlier than the father of the appellant
 - (e). That respondent No.1 was competent enough to exercise his powers to Appoint/withdraw as per rules and policy.
- Any other ground which is not taken may kindly be allowed at time of arguments.

It is therefore humbly prayed that the instant appeal may kindly be dismissed with cost


SECRETARY
E&SE DEPTT: KHYBER PAKHTUNKHWA
PESHAWAR


DISTRICT EDU OFFICER
(MALE) KOHAT

Amek A

OFFICE OF THE PRINCIPAL GOVT HIGHER SECY SCHOOL TOGH BALA KOHAT
APPOINTMENT ORDER

Mr. Adil Rehman S/O Fazal Rehman R/O Village & Union Council Togh Bala Tehsil & District Kohat is hereby appointed as Chowkider at GHSS Togh Bala against vacant Post on merit basis in BPS-01(4800-150-9300) Plus usual allowance in the interest of public service with effect from date of taking over charge.

TERMS AND CONDITIONS

1. He will be governed by such rules and regulation as may be issued from time to time by the Govt
2. His service will be terminated by any time, in case his performance is found unsatisfactory/found any error/fraud he will be processed against under E&D rules 1973.
3. He is required to produce Health and Age Certificate from Medical Authority concerned before taking over charge.
4. He will not handed over charge if he is under 18 years and above 45 years of age
5. His service will considered as regular but without pension and gratuity in term of amended by Khyber Pakhtunkhwa Civil servants amendment act 2005.
6. He will have to take over charge within 15 days after the issuance of this office order otherwise the order will stand null and void


(ABDUL KHALIQ)

PRINCIPAL GOVT HIGHER SECY SCHOOL
TOGH BALA KOHAT

Endst.No. 596-99 dated 28 / 12 / 2013

Copy to the:-

1. District Education Officer (Male) Kohat
2. District Accounts Officer Kohat
3. Candidate concerned


ATTESTED


PRINCIPAL GHSS TOGH BALA
KOHAT

Annexure E (2)

(E)

Annexure
"A"

OFFICE OF THE PRINCIPAL GHSS TOGH BALA KOHAT

APPOINTMENT ORDER

As per judgment of Honorable Provincial Ombudsman Khyber Pakhtunkhwa Peshawar under complaint No 0820/2012 and further direction by D.E.O (M) Kohat vide No 595 Dated 11-02-2014 Mr. Khyal Zaman S/O Fazal Rehman Resident of Vill: Togh Bala Kohat is hereby appointed as Chowkedar in B.P.S-01(4800-150-9300) with immediate effect on the following terms and conditions.

- 1: He will be governed by such rules and regulations as may be issued from time to time by the government.
- 2: His services will be terminated by any time incase his performance is found unsatisfactory/found any error/fraud, he will be proceeded under E&D rules 1973.
- 3: He is required to produce health & Age certificate from Medical authority concerned before taking over charge.
- 4: He will not handover charge if he is under 18 Years and above 45 Years age.
- 5: His service will be considered as regular but without pension and gratuity in term of Khyber Pakhtunkhwa civil servant amendment act 2005.
- 6: He will have to take over charge within 15 days after the issuance of this order otherwise the order will stand null & void.

(ABDUL KHALIQ)

PRINCIPAL GOVT HIGHER SECY SCHOOL
TOGH BALA KOHAT

Endst, No. 628-31

Dated 11/1/2014

Copy to:

1. District Education Officer (Male) Kohat
2. District Account Officer Kohat
3. Provincial Ombudsman Khybar Pakhtunkhwa Peshawar.
4. Candidate Concerned

ATTESTED

Principal
GHSS Togh Bala
Kohat

(A)

Annexure (E) (2)

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) KOHAT

No. 595 / Class- IV Appt File

Dated: 11 / 02 / 2014

To

The Principal
GHSS Togh Bala
Kohat

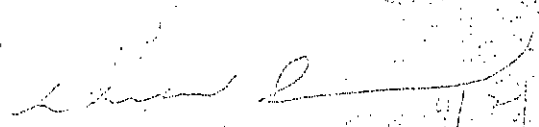
Subject: COURT DECISION UNDER COMPLAINT NO. 0820 / 2012

Memo

Reference your letter no. 607 Dated: 10.02.2014 in the above cited subject.

You are directed to implement the judgment of honourable Ombudsmen Khyber Pakhtunkhwa Peshawar and to honour the recommendation of enquiry officer without any further loss of time to appoint Mr. Khyal Zaman S/o Fazal Rehman. (enquiry report is attached for ready reference)

Moreover, cancellation / stand a previous order in respect of Mr. Adil Rehman S/o Fazal Rehman in your jurisdiction being a competent appointing authority.


DISTRICT EDUCATION OFFICER (M)
KOHAT

Before the Honourable Service Tribunal Peshawar

Appeal No 827,828/2014

Mr. Adil Rehman S/o Fazal Rehman r/o Togh Bala Kohat
Appellant

VERSUS

1. Principal Govt Higher Secondary School Togh Bala (Kohat)
Respondent
2. District Education officer (M) Kohat

RESPECTFULLY SHEWTH

Para wise comments on behalf of principal GHSS Togh Bala Kohat are as Under:-

Preliminary Objections:-

- A. That appeal has no cause of action.
- B. That appeal has no locus standi.
- C. That appeal is time- barred.
- D. That appeal is based on prejudice.
- E. That appeal is just an interference in administrative affairs.

Facts:-

1. Incorrect , the petitioner has no right to be heard at the time of cancellation of appointment order as per government procedure,
2. Incorrect, there is no distinction between the post of class IV for appointment.
3. Incorrect, the Honourable ombudsman is independent in decisions and implementation of his decision is binding upon government departments.
4. Incorrect, the respondent No.4 was the deserving candidate because his mother retired earlier than the father of appellant.
5. Incorrect, the then principal being competent exercised his powers, following the merit policy, appointed respondent No.4, the most deserving candidate under the laws.

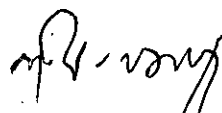
Any other ground which is not taken may kindly be allowed at time of arguments.

Hence it is prayed that the appeal may be set aside and respondent No.4 may be allowed to continue his service:

Annexe "A". Appointment Order

Annexe "B" . Court Decision under complaint No.0820/2012

Annexe "C". Appointment against employee son's quota


Principal
GHSS Togh Bala
Kohat
Principal
G.H.S.S Togh Bala
Kohat

5

Annexure
"A"

OFFICE OF THE PRINCIPAL GHSS TOGH BALA KOHAT

APPOINTMENT ORDER

As per judgment of Honorable Provincial Ombudsman Khyber Pakhtunkhwa Peshawar under complaint No 0820/2012 and further direction by D.E.O (M) Kohat vide No 595 Dated 11-02-2014 Mr. Khyal Zaman S/O Fazal Rehman Resident of Vill: Togh Bala Kohat is hereby appointed as Chowkedar in B.P.S-01(4800-150-9300) with immediate effect on the following terms and conditions.

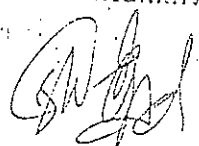
- 1: He will be governed by such rules and regulations as may be issued from time to time by the government.
- 2: His services will be terminated by any time incase his performance is found unsatisfactory/found any error/fraud, he will be proceeded under E&D rules 1973.
- 3: He is required to produce health & Age certificate from Medical authority concerned before taking over charge.
- 4: He will not handover charge if he is under 18 Years and above 45 Years age.
- 5: His service will be considered as regular but without pension and gratuity in term of Khyber Pakhtunkhwa civil servant amendment act 2005.
- 6: He will have to take over charge within 15 days after the issuance of this order otherwise the order will stand null& void>

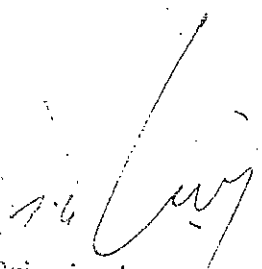
(ABDUL KHALIQ)
PRINCIPAL GOVT HIGHER SECY SCHOOL
TOGH BALA KOHAT

Endst, No. 628-31

Dated 11/1/2014

- Copy to:
1. District Education Officer (Male) Kohat
 2. District Account Officer Kohat
 3. Provincial Ombudsman Khybar Pakhtunkhwa Peshawar.
 4. Candidate Concerned


ATTESTED


Principal
GHSS Togh Bala
Kohat

Annex B

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) KOHAT

No. 595 / Class- IV Apptt File

Dated: 11 / 02 / 2014

To

The Principal
GHSS Togh Bala
Kohat

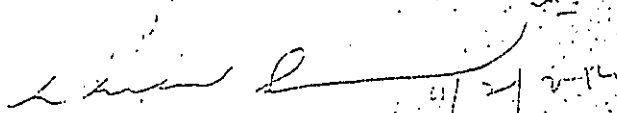
Subject: COURT DECISION UNDER COMPLAIN NO. 0820 / 2012

Memo

Reference your letter no. 607 Dated: 10.02.2014 in the above cited subject

You are directed to implement the judgment of honourable Ombudsmen Khyber Pakhtunkhwa Peshawar and to honour the recommendation of enquiry officer without any further loss of time to appoint Mr. Khyal Zaman S/o Fazal Rehman. (enquiry report is attached for ready reference)

Moreover, cancellation / stand a previous order in respect of Mr. Adil Rehman S/o Fazal Rehman in your jurisdiction being a competent appointing authority.


DISTRICT EDUCATION OFFICER (M)
KOHAT



PROVINCIAL OMBUDSMAN SECRETARIAT,
KHYBER PAKHTUNKHWA.

House No. T-1943, Salar Lane, Old Bara Road Afzal
Abad University Town Peshawar.
Office Phone # 091-5846084-85 Fax # 091-5846006
Email: provinciombudsman@gmail.com

Annex - C

REJOINDER:

P.O/Complaint No. 0820/2012 / *job* Dated Peshawar the, 12/02/2013

To

Mr. Khayal Zaman S/o Fazal Rehman,
R/o Mohallah Sami Khel Pindi Road Togh Bala,
Tehsil and District Kohat

Subject :- APPOINTMENT AGAINST EMPLOYEE SON'S QUOTA

The reply of the Agency (Office of the District Education Officer (Male) Kohat) No. 209, dated: 31/01/2013 received to this office is enclosed for your perusal and rejoinder on or before 21/02/2013 positively, failing which it will be presumed that you have no objection on the report of the Agency

THIS ISSUES WITH THE APPROVAL OF THE KHYBER PAKHTUNKHWA OMBUDSMAN.

(Consultant-I)

Provincial Ombudsman Secretariat,
Khyber Pakhtunkhwa,
Peshawar.



PROVINCIAL OMBUDSMAN SECRETARIAT,
KHYBER PAKHTUNKHWA.


House No. T-1943, Salar Lane, Old Dara Road Atkal Abad,
University Town Peshawar.
Office Phone # 091-5846084-85, Fax # 091-5846006
Email: provincialombudsman@email.com

REJOINDER

Written reply of the Agency was communicated to the complainant for his feedback. In response, the complainant expressed satisfaction on the reply of the Agency and agreed to wait for his turn.

FINDINGS

The complainant has expressed satisfaction on the response of the Agency and has agreed to wait for his turn, therefore, the complaint in hand is disposed of as having borne fruit in terms of Regulation 10 (2) of the Khyber Pakhtunkhwa Provincial Ombudsman Office (Registration, Investigation and Disposal of Complaints) Regulations, 2011. However, District Education Officer (male) Kohat shall consider him against 25% reserved quota in terms of the rules and policy of the provincial Government provided he fulfills the requirements of the post.


27-12-2013
(BADSHAH GUL WAZIR)
Provincial Ombudsman,
Khyber Pakhtunkhwa.

**PROVINCIAL OMBUDSMAN SECRETARIATE,
KHYBER PAKHTUNKHWA, PESHAWAR**

Overseas Pakistani Foundation Building Phase-V,
Near NADRA Head Office, Hayatabad, Peshawar.
Office Phone # 091-9219531-32, Fax # 091-9219526
Email: provincialombudsman@gmail.com

Comolaint No. 0820/2012

5277-78

Dated: 12/11/2013

To,

The District Education Officer (Male)
District Kohat

Subject:

APPOINTMENT AGAINST RETIRED EMPLOYEES SON'S QUOTA

Dear Sir,

I am directed to refer to this Secretariat complaint No. 0820/2012 dated: 21/02/2013 on the subject noted and to enclose application submitted by Khyal Zaman (complainant) for your views/comments please.

I am further directed to state that compliance/implementation report in the subject compliant is still awaited which shall be furnished to this Secretariat at the earliest.

THIS ISSUES WITH THE APPROVAL OF THE PROVINCIAL OMBUDSMAN.

[Signature]
Assistant Director
(Implementation),
Provincial Ombudsman Secretariat,
Khyber Pakhtunkhwa,
Peshawar.

Endst: of even No. & date:

Copy forwarded to:

1. Secretary (E&SE) Department Khyber Pakhtunkhwa, Peshawar.
2. P.S to Provincial Ombudsman, Khyber Pakhtunkhwa.

[Signature]
Assistant Director
(Implementation),
Provincial Ombudsman Secretariat,
Khyber Pakhtunkhwa,
Peshawar.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

In the matter of:
Service Appeal No.828/2014

Adil Rehman.....Appellant

Versus

Principal Govt. Higher Secondary School,
Togh Baha, Kohat and others.....Respondents

**Rejoinder/ Counter-reply on behalf of the
appellant to the comments of the Principal
GHHS Togh Bala (Respondent No.1), is as
under:**

Respectfully Submitted:

REPLY TO THE PRELIMINARY OBJECTIONS:

- A. Para-A is incorrect. Appellant has got the cause of action.
- B. Para-B is incorrect.
- C. Para-C is incorrect. The appeal is within time.
- D. Para-D is incorrect. There is no prejudice of the appellant.
- E. Para-E is incorrect. Depriving a person from his legal right is questionable in a court of law whether it is through administrative order or any other form.

IN REPLY TO THE FACTS

- 1. This Para is incorrect. Right of being heard is a recognized principle of law of which nobody can be

deprived specially when the appellant was appointed according to law and rules. It is to be mentioned that when the post in question was advertised, a Selection Committee was constituted to receive and scrutinize the documents of those candidates who applied for the Chowkidar post in GHSS Togh Bala, Kohat, but the respondent Khyal Zaman did not apply for such post, as is apparent from the aspiring candidates list prepared by the Principal GHSS Togh Bala, Kohat. How could the appointment of appellant be cancelled without any opportunity of being heard given to the appellant in such circumstances when Khyal Zaman has even not applied for the post at the relevant time? Copies of all the documents are attached as Annexure "L", "M", "N" & "NN".

2. Para-2 is incorrect and not understandable. Even a Class-IV employee is to be treated according to law. The appellant was correctly appointed as Class-IV employee.
3. In reply to this para, it is submitted that the hon'ble Ombudsman was not apprised of the real facts. How can the son of a deceased employee, retired in 2003, can be accommodated on a post of employee retired in 2013 i.e. after 10 years when the son of such retired person is even not aspiring for such post at the relevant time.
4. Para No.4 is incorrect, respondent No.4 was not the deserving candidate as submitted in the above paras

rather the appellant is the proper and suitable person who was rightly appointed.

5. Para-5 is incorrect. Reply has been given in the above paras.

REPLY TO THE GROUNDS:-

The grounds taken in the appeal have not been denied, hence, no need of further reply.

It is, therefore, prayed that the comments of the Principal (respondent No.1) may be discarded and the appeal of the appellant may be accepted, restoring the appellant to his post, as is prayed for, with all back benefits under the rules.

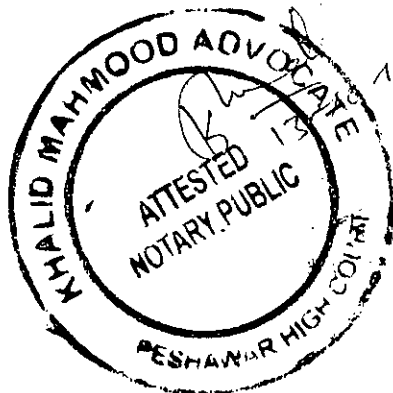
Appellant
Adil Rehman

Through

Mazullah Barkandi
Advocate Peshawar

AFFIDAVIT

I, do hereby affirm and declare on oath that the contents of the accompanying Rejoinder are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



Adil Rehman
Deponent

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

In the matter of:
Service Appeal No.827/2014

Adil Rehman.....Appellant

Versus

Principal Govt. Higher Secondary School,
Togh Baha, Kohat and others.....Respondents

Rejoinder/ Counter-reply on behalf of the
appellant to the comments of respondents No.2
& 3, is as under:

Respectfully Submitted:

REPLY TO THE PRELIMINARY OBJECTIONS:

1. Para-1 of the reply is incorrect. Respondent No.4 has illegally been appointed by cancelling the appointment order of the appellant, who even had not applied for the requisite post, when it was advertised by the Principal GHSS Togh Bala, Kohat. (All the relevant documents have been attached with the rejoinder submitted to the reply of the Principal). The appellant has got the cause of action.
2. Para-2 is incorrect. Reply is given in the above para.
3. Para-3 is incorrect. The appeal is within time.
4. Para-4 is incorrect, the appeal is maintainable in its present form.

5. Para-5 is incorrect.

IN REPLY TO THE FACTS

1. Para-1 needs no reply.
2. In reply to this para, it is submitted that the appellant has been removed from service when respondent No.4 procured an order from the hon'ble Ombudsman Peshawar without apprising him of the real facts.
3. Para-3 needs no reply..
4. Para-4 is incorrect. How can be Khiyal Zaman on top of merit, when no such merit list has been prepared. The ombudsman has heard respondent No.4 alone, without knowing the real facts of the case.
5. Para-5 is incorrect. The Principal of GHSS Togh Bala, Kohat after advertising the requisite post and conducting interviews, appointed the appellant according to the rules and regulations (All the relevant documents have been attached with the rejoinder to the reply to the Principal)
6. In reply to this para, the appellant was properly appointed on the post of class-IV in his Union Council.

REPLY TO THE GROUNDS:-

The reply given to the grounds is incorrect. This has already been explained in the above paras and the appeal is liable to be accepted.

It is, therefore, prayed that the reply of respondents No.2 & 3 may be ignored and the appeal of the appellant may be accepted and the impugned order may be set-aside, with cost and all back benefits, as is prayed for.

Appellant
Adil Rehman

Through

Mazullah Barkandi
Advocate Peshawar

and

Amal Khan Barkandi
Advocate, Peshawar.

AFFIDAVIT

I, do hereby affirm and declare on oath that the contents of the accompanying Rejoinder are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

Deponent

BEFORE THE KHYBER PAKHTUNKHWA SERVICE

TRIBUNAL PESHAWAR

In the matter of:
Service Appeal No.827/2014

Adil Rehman

Versus

Principal Govt. Higher Secondary School & others

**Rejoinder/ Counter-reply on behalf of the
appellant to the reply of respondent No.4
(Khiyal Zaman), is as under:**

Respectfully Submitted:

REPLY TO THE PRELIMINARY OBJECTIONS:

- 1) Para-1 of the reply is incorrect. Respondent No.4 has illegally been appointed by cancelling the appointment order of the appellant/ who even had not applied for the requisite post, when it was advertised by the Principal GHSS Togh Bala, Kohat. (All the relevant documents have been attached with the rejoinder submitted to the reply of the Principal). The appellant has got the cause of action.
- 2) Para-2 is incorrect, the appeal is maintainable in its present form.
- 3) Para-3 is incorrect. The appellant has been deprived of his right in an illegal manner, as the respondent had not got any right to the post fallen vacant in the year 2013, while his mother has retired in 2003.

- 4) Para-4 is incorrect. Cancellation of the appointment of the appellant is on no lawful reason and without giving opportunity of being heard. This is a stigma on the career of the appellant, which can be removed by striking down the impugned order dated 11.02.2014.
- 5) Reply of this para has already been given. Respondent No.4 has illegally been appointed and the appointment of the appellant has illegally been cancelled.

IN REPLY TO THE FACTS

1. Para-1 of the facts is not correctly stated one. The appellant has not been removed from service on any of the grounds mentioned in Para-2 of the appointment order dated 28.12.2013. Instead the appointment of the appellant was cancelled when respondent No.4 procured an order from the hon'ble Ombudsman Peshawar without apprising him of the real facts.
2. Para-2 needs no reply.
3. Reply of this para has already been given. The hon'ble Ombudsman has heard respondent No.4 alone without knowing the real facts of the case. Hence, such an order has got no effect on the appointment of the appellant who was not heard by the Ombudsman nor was the appellant made party in the complaint-case before the Ombudsman.
4. This para has not been correctly stated. The appointment on the retired employee's posts is with certain ratio and is for each year. It is worth mentioning that respondent No.4 even did not apply for the requisite post when it was advertised by the Principal

GHSS Togh Bala Kohat. Documents have already been submitted.

5. Para-5 is incorrect. The impugned order is illegal and is of no legal effect, which is liable to be struck down as already submitted in the above paras.

REPLY TO THE GROUNDS:-

The reply given to the grounds is incorrect. This has already been explained in the above paras and the appeal is liable to be accepted.

It is, therefore, prayed that the reply of Khiyal Zaman/ respondent No.4 may be ignored and the appeal of the appellant may be accepted and the impugned order may be set-aside, with cost and all back benefits, as is prayed for.

Appellant

Adil Rehman

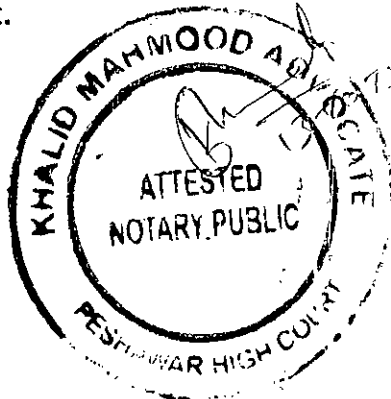
Through

Mazullah Barkandi

Advocate Peshawar

AFFIDAVIT

I, do hereby affirm and declare on oath that the contents of the accompanying Rejoinder are true and correct to the best of my knowledge and belief and nothing has been concealed from this hon'ble Court.



Adil Rehman
Deponent

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KOHAT

APPOINTMENT ORDER

Consequent upon the recommendations of the Departmental Selection Committee, the Competent Authority is pleased to order the appointment of the following candidates against the post of Class-IV in BPS-03 (Rs. 9610-390-21310) plus usual allowances as admissible under the Rules. The competent authority is further pleased to post them against vacant position mentioned before their name on the terms & conditions given below with immediate effect:-.

100% Deceased Sons Quota

S#	Name	Father Name	Dom/ CNIC	Designation/Place of Posting
1.	Muhammad Fawad	Late Rajab Ali EX-Chowkidar	Kohat	Chowkidar, GPS No.1 Billitang
2.	Mst:Bibi Hawa	W/O Late Taza Gul Ex-N/Q	Kohat	N/Q,GMS Gurgura
3.	Iqtidar Hussain	Late Noor Hussain Ex-Sweeper	Kohat	Sweeper,GHS Chikerkot Bala
4.	Arshad Hadi	Late Abdul Hadi Ex-TT	Kohat	N/Q,GMS Dheri Banda Dhoda
5.	Abdullah Jan	Late Boi Khan Ex-CT	Kohat	Sweeper,GHSS Dhand Saghri
6.	Muhammad Kamran	Late Zahid Hussain Ex-Chowkidar	Kohat	L/Attd., GHS Jabber
7.	Furqan Bad Shah	Late Jn Bad Shah Ex-Chowkider	Kohat	W/C,GHSS Mandoori Kohat
8.	S.Murtaza Hussain Shah	Late S.Shah Noor Husain Gul Ex-Chowkider	Kohat	Chowkidar, GPS Kamsam Kachai
9.	Yateem Shah	Late Soorat Shah Ex-Chowkider	Kohat	Chowkidar,GPS Jabgabroo

25% Retired Employees Sons Quota

S#	Name	Father Name	Dom/ CNIC	Sen: No	Designation/Place of Posting
1.	✓ Muhammad Naeem	Khan Gul, Ex-N/Q	Kohat	02	Lab:Attd,GHSS No.1 Kohat,
2.	✓ Azmat Ali Shah	Zaman Shah Ex-Chowkider	Kohat	03	Chowkider,GPS Lachi Payan
3.	✓ Muhammad Zahid	Muhammad Khalil, Ex-W/C	Kohat	04	Chowkidar,GCMHS No.4 Kohat (Order will be effective w.e.f 01/01/2018)
4.	✓ Mir Aslam	Mursaleen Khan, Ex-Chowkidar	Kohat	05	Lab:Attd, GHS Shadi Khel
5.	✓ Idress Khan	Wakeel Khan Ex-Chowkidar	Kohat	07	Lab:Attd, GHS Mir Banda Jerma
6.	✓ Muhammad Sadiq	Usman Khan, Ex-N/Q	Kohat	08	Lab:Attd, GHSS S/Dara
7.	✓ Aziz ur Rehman	Khodad Khan Ex-Sweeper	Kohat	10	N/Q,GHS Ghurzai Payan
8.	✓ Shoukat Sadam	Zamidullah, Ex-Chowkidar	Kohat	11	Lab/Attd, GHS Tappi Kohat
9.	Adil Mehmood	Saadullah Khan, Ex-Chowkidar	Kohat	12	Chowkidar,GPS PAF Bazar
10.	Nasir Khan	Gul Janan, Ex-Chowkidar	Kohat	13	Sweeper,GHSS Togh Bala
11.	Adil Rehman	Fazal Rehman, Ex-Chowkidar	Kohat	14	N/Qasid,GHSS Billitang
12.	Shakir Manan	Fazal Manan, Ex-N/Q	Kohat	15	Sweeper,GHS Darmalak
13.	Musabir ud Din	Basar Din, Ex- L/Attd:	Kohat	16	Lab Attd,GHS Lachi Payan
14.	Muhammad Ismail	Abdul Jalil, Ex-Sweeper	Kohat	17	Sweeper,GHS Shadi Pur
15.	Sartaj Ali	Ali Qamber, Ex-Chowkidar	Kohat	18	Chowkider,GPS Chashma Miitha Khan
16.	Noor Rehman	Subhan Din, Ex-Bearer	Kohat	19	Bearer,GHSS Lachi
17.	Saeed Ur Rehman	Sabz Ali Khan	Kohat	20	Chowkidar, GPS Mehmandi
18.	Abdullah Noor	Abdullah Noor, Ex-Chowkidar	Kohat	21	Chowkider,GPS Darasha Khel
19.	Khyal Saeed	Shahzad Khan , Ex-Chowkidar	Kohat	22	Chowkider,GPS Bazid Khel
20.	Yaqoob Khan	Lachi Khan, Ex- L/Attd	Kohat	23	Lab:Attd, GHSS Gumbat
21.	S.Mujahid Shah	S.Muqem Shah, Ex-Chowkidar	Kohat	24	Chowkider,GPS Showeki
22.	Jehangir Khan	Faroz Khan, Ex-Chowkidar	Kohat	25	Chowkider,GPS No.2 Chorlaki
23.	Ihsanullah	M. Rehman Ex-Chowkidar	Kohat	26	Chowkider GPS Dh:Gulab Din Siab
24.	Attaullah	Noor Zada, Ex-Chowkidar	Kohat	27	Chowkider,GPS Takht
25.	Ghous Ali Shah	Itbar Shah, Ex-L/Attd:	Kohat	28	Lab:Attd, GHS Shadi Khel
26.	Nabi Ullah	Saadullah Khan	Kohat	29	Chowkidar, GPS Manda Khel

03% Minority Quota

S#	Name	Father Name	Dom/ CNIC	Designation/Place of Posting
1.	Adil Masih	Arif Naz	Kohat	Sweeper,GHSS No.1 Kohat
2.	Rakesh Anoop	Anoop Chand	Kohat	Sweeper GHS Tappi Kohat
3.	Junaid Masih	Javed Masih	Kohat	Sweeper,GHSS Landi Kachi Kohat

02% Disable Quota

S#	Name	Father Name	Dom/CNIC	Designation/Place of Posting
1.	Safi ud Din	Faqir Shah	Kohat	W/C, GHS No.3 Kohat
2.	Sher Ali	Mirza Ali	Kohat	Lab Attd:, GHSS Mandoori Kohat

Open Candidates

S#	Name	Father Name	Dom/CNIC	Designation/Place of Posting
1.	Muhammad Akram	Islam Hussain	Kohat	Chowkidar, GPS Mian Kohi
2.	Farid Ullah	Said Amin	Kohat	Chowkidar, GPS Dhok Khan Afzal
3.	Muhammad Ilyas	Mewa Khan	Kohat	Sweeper, GMS Dhall Behzadi
4.	Muhammad Riaz	Muhammad Jan	Kohat	Lab Attd:, GHS Kot
5.	Amir Khan	Hakim Bad Shah	Kohat	Chowkidar, GPS Dhok Jalal Ud Din
6.	Umar Farooq	Makamil Shah	Kohat	Chowkidar, GPS Dheri Banda
7.	Shakir Shah	Usman Shah	Kohat	Lab Attd:, GHS Shiekhan
8.	Basit Shah	Radeem Shah	Kohat	Sweeper, GHS Shiekhan
9.	Daud Shah	Said Wali Khan	Kohat	Sweeper, GHS Bazid Khel
10.	Abdul Qadir	Ahmad Naseer	Kohat	Lab Attd:, GHSS Dhoda
11.	Fatir Jalil	Ahmad Naseer	Kohat	N/Q, GHSS Dhoda
12.	Sahib Kiran	Muhammad Sami Ullah	Kohat	Chowkidar, GHSS Dhoda
13.	Atta Ullah	Sajid Khan	Kohat	Chowkidar, GPS Ghulam Banda
14.	Said Bad shah	Mohsin Shah	Kohat	Chowkidar, GPS Karigar Togh Bala
15.	Umer Farooq	Ashraf Khan	Kohat	Chowkidar, GPS Dhok Afzal Abad
16.	Aman Ullah	Khan Mir	Kohat	Chowkidar, GPS Dhok Noor Alam Siab
17.	Irshad Noor	Akram Gul	Kohat	Chowkidar, GPS Shakoori Banda
18.	Azhar Jamal	Gul Bahadar	Kohat	Lab Attd:, GHS Khwaja Khel Kohat
19.	Gul Nawaz	Said Bahadar	Kohat	Chowkidar, GHS Khwaja Khel Kohat
20.	Sajjad Khan	Shah Nazar	Kohat	Chowkidar, GHS Babri Banda
21.	Kobab Hashim	Hashim Khan	Kohat	Chowkidar, GHSS Billitang Kohat
22.	Shah Fakhar	Mehmood Hussain	Kohat	Chowkidar, GPS No.1 KDA
23.	Wahid Shah	Niaz Badshah	Kohat	W/C, GHS No.2 Kohat
24.	Muhammad Sadiq	Muhammad Saeed	Kohat	W/Attd:, GHS No.2 Kohat
25.	Ijaz Ali	Ghulam Naqi	Kohat	Chowkidar, GPS Musa Khel Kachai
26.	Anwar Sajjad	Surat Shah	Kohat	N/Q, O/O DEO Male Kohat
27.	Muhammad Ehtesham	Muhammad Aslam	Kohat	N/Q, O/O DEO Male Kohat
28.	Muhammad Akmal	Muhammad Ajmal	Kohat	Chowkidar, O/O DEO Male Kohat
29.	Tor Gul	Sher Zaman	Kohat	N/Q, GHS Marai Payan
30.	Haider Ali	Dilbar Ali	Kohat	Chowkider, GPS No.1 Marai Bala
31.	Arshad Iqbal	Shah Jehan	Kohat	Chowkidar, GPS Tappi
32.	Aqib Javed	Shoaib Khan	Kohat	Chowkidar, GPS No.2 Baqi Zai
33.	Yasir Khan	Kamil Khan	Kohat	N/Q, GHS Tappi Kohat
34.	Muhammad Ishaq	Abdul Majid	Kohat	Chowkidar, GPS No.1 Baqi Zai
35.	Habib Ur Rehman	Saidan Gul	Kohat	Chowkidar, GPS Merozai
36.	Zahir Ali	Serat Ali	Kohat	Chowkidar, GPS Spina Khowra
37.	Shaheen Hussain	Iqbal Hussain	Kohat	Chowkidar, GPS No.1 Kach Kina
38.	Ashiq Ali	Asker Ali	Kohat	Chowkidar, GHS Sherkot
39.	Mudasir Ali	Mumtaz Ali	Kohat	Lab Attd:, GHS Tora Warai Kachai
40.	Kifayat Ali	Wahab Ali	Kohat	Chowkidar, GHS Tora Warai Kachai
41.	Iqrar Ahmed	Iftikhar Ahmed	Kohat	N/Q, GCHS Kohat
42.	Muhammad Wasim	Muhammad Jasim	Kohat	Lab Attd:, GHSS Muhammad Zai
43.	Zahir Khan	Shahid Khan	Kohat	Chowkidar, GHSS Muhammad Zai
44.	Safeer Ullah	Mir Azam	Kohat	Lab Attd:, GHSS Muhammad Zai
45.	Muhammad Zubair	Gul Faqir	Kohat	N/Q, GHSS Muhammad Zai
46.	S.Ishfaq Hussain	S.Gulfat Hassan	Kohat	Lab Attd:, GHSS Khadizai
47.	Mustajab Ali	Sultan Ali	Kohat	Lab Attd:, GHSS Khadizai
48.	Sheraz Ali	Shaban Ali	Kohat	Chowkidar, GHSS Khadizai
49.	Farhad Ali	Arab Ali	Kohat	Chowkidar, GPS Gul Karam Karoona
50.	S.Nawazish Abbas	S.Ishfaq Hussain	Kohat	Chowkidar, GPS Kizar Banda
51.	Muhammad Rehman	Muhammad Zaman	Kohat	N/Q, GHSS Mandoori
52.	Syed Jamat Ali Shah	Syed Fazal Shah	Kohat	Chowkider, GHSS Mandoori
53.	Shahid Ayaz	Muhammad Younas	Kohat	N/Q GHSS Muslim Abad
54.	Dost Muhammad	Jalandar Khan	Kohat	Lab Attd:, GHSS Muslim Abad
55.	Abdul Haleem	Muhammad Rafiq	Kohat	N/Q, GHSS Muslim Abad

S#	Name	Father Name	Dom/CNIC	Designation/Place of Posting
56.	Zahid Shah	Ahmad Ali Shah	Kohat	Chowkidar, GHSS Muslim Abad
57.	Danish	Khan Amir Khan	Kohat	N/Q, GHS Lachi Payan
58.	Muhammad Haroon	Taj Muhammad	Kohat	W/C, GHS Lachi Payan
59.	Nasir Khan	M. Ali Khan	Kohat	Sweeper, GHSS Lachi
60.	Asad Khan	Iqbal Khan	Kohat	Lab Attd., GHSS Lachi
61.	Nizam Khan	Usman Khan	Kohat	N/Q, GHSS Lachi
62.	Muhammad Asim Khan	Niaz Ud Din	Kohat	N/Q, GHSS Lachi
63.	Asif Nawaz	Muhammad Nawaz	Kohat	Chowkidar, GPS Bori Saghri
64.	Abdul Khaliq	Fazal Hakim	Kohat	Chowkidar, GPS Alfalah Colony
65.	Syed Muhammad	Seen Muhammad	Kohat	Sweeper, GHS Kiro Sam
66.	Muhammad Ali Khan	Mir Wali Khan	Kohat	Lab Attd., GHSS Nandraka
67.	Muhammad Bilal	Rabli Gul	Kohat	N/Q, GHSS Nandraka
68.	Sarmad Sunil	Abdullah Khan	Kohat	Chowkidar, GHSS Nandraka
69.	Muhammad Gul	Taj Gul	Kohat	Chowkidar, GPS Jabbi
70.	Muhammad Sajeed	Muhammad Idrees	Kohat	Chowkidar, GPS Faqir Abad S/Dara
71.	Farmanullah	Ubaidullah Jan	Kohat	Chowkidar, GPS Shiekhano Banda

Note: No TA/DA etc is allowed.

Terms & Conditions

Ali Shah
MNU
District Education Officer
(Male) Kohat

- Charge reports should be submitted to all concerned in duplicate.
- Their seniority will be determined in accordance with the relevant Rules and Policy
- They should not be handed over charge if they exceed the age of 40 Years or below 18 Years.
- Their services are liable to termination on One month's notice from either side. In case of resignation without notice, their One month Pay/Allowances shall be forfeited to the Government.
- They should join their post within 15 days of the issuance of this order, their appointment shall be treated / considered as cancelled automatically and no subsequent appeal etc shall be entertained in this regard
- Health & Age certificate should be produced from the Medical Superintendent concerned before taking over charge.
- They will be governed by such Rules & Regulation issued from time to time by the Government.
- Their services shall be terminated at any time, in case their performance is found unsatisfactory during their probation period. In case of misconduct, they shall be proceeded under the Rules framed from time to time.
- They will be on probation for a period of on one year, extendable to another one year.

District Education Officer
(Male) Kohat

Endst: No. 14852-60 File Class-IV Appointment

Dated Kohat the 22 / 12 / 2017.

Copy forwarded for information and necessary action to the:

- District Nazim Kohat.
- P.A to Director E&SE Khyber Pakhtunkhwa, Peshawar.
- Deputy Commissioner Kohat.
- District Accounts Officer Kohat.
- District Monitoring Officer (IMU) Kohat.
- SDEO (Male) Kohat & Lachi.
- All Principals/ Headmasters/Head Teachers concerned.
- Official Concerned.
- M/File

MNU
Dy: District Education Officer
(Male) Kohat