

S.No.	Date of Order or proceedings	Order or other proceedings with signature of Judge or Magistrate and that of parties where necessary.
1	2	3
	18.01.2017	<p style="text-align: center;"><u>BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL CAMP COURT ABBOTTABAD</u></p> <p style="text-align: center;"><u>APPEAL NO. 1245/2014</u></p> <p style="text-align: center;"><u>Muhammad Javed Versus Government of Khyber Pakhtunkhwa through Secretary, E&SE, Peshawar and 3 others.</u></p> <p style="text-align: center;"><u>JUDGMENT</u></p> <p style="text-align: center;"><u>MUHAMMAD AZIM KHAN AFRIDI, CHAIRMAN:-</u></p> <p>Counsel for the appellant and Mr. Muhammad Siddique, Senior Government Pleader alongwith Mr. Muhammad Usman, Senior Clerk for respondents present.</p> <p>2. Muhammad Javed Theology Teacher hereinafter referred to as the appellant has preferred the instant service appeal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 against impugned notification dated 27.05.2014 vide which he was reverted from the post of Senior T.T BPS-16 to the post of Qari w.e.f. the date of his promotion.</p> <p>3. Brief facts of the case of the appellant are that the appellant was initially appointed as Qari on 03.11.1986. That while serving as Qari BPS-07 he was granted leave w.e.f. 03.12.1993 to 02.12.1995 which he availed and there-after he was adjusted against the post of T.T w.e.f. 03.12.1995 vide order dated 17.01.1996. With the passage of time his</p>

~~AS~~
18.01.17

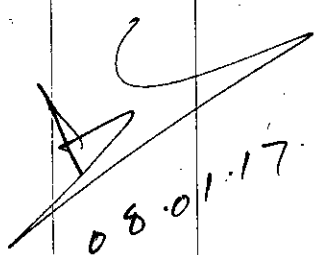
pay was revised in BPS-09 as he was holder of Secondary School Certificate (SSC). Thereafter the post was upgraded to BPS-15 on 01.07.2012 and finally appellant was promoted as Senior T.T on 27.02.2013 and while serving as Senior T.T the impugned notification dated 27.05.2014 was issued.

4. Learned counsel for the appellant has argued that the impugned notification is against facts and law as the appellant was adjusted by the department and then granted upgradation and promotion. That the rights accrued to the appellant could not be taken away in the shape of impugned notification. That the impugned order is therefore liable to be set aside.

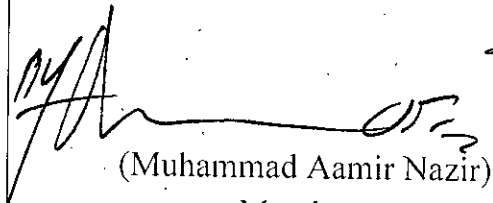
5. Learned Government Pleader has argued that the appellant was not entitled to appointment as T.T and that his promotion was also against law and rules and that he drew salary and other emoluments of higher post illegally and as such the impugned order based on audit report of the District Accounts Office warrants no interference.


6. We have heard arguments of learned counsel for the parties and perused the record.

7. It is not disputed before us that the appellant has served as Qari and then as T.T and, with the passage of time, he was promoted as Senior T.T on 27.02.2013 where-after he was performing his duties as Senior T.T when the impugned notification was issued reverting the appellant from the post of Senior T.T (BPS-16) to that of Qari BPS- 12. Since the impugned notification was passed without affording any opportunity to the appellant and despite the fact that vested rights to the

A handwritten signature is present in the left margin, with the date '08.01.17' written below it.

appellant has accrued as he was promoted as Senior T.T by the relevant authority as such we are constrained to accept the present appeal, set aside the impugned order and reinstate the appellant as Senior T.T with the directions to the respondents that before passing any such orders appellant shall be given an opportunity of hearing by way of issuance of show cause notice to him stating therein reasons for his demotion and after receipt of the reply of the appellant. The respondents shall pass orders deemed appropriate. Parties are left to bear their own costs. File be consigned to the record room.

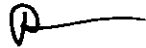

(Muhammad Aamir Nazir)
Member


(Muhammad Azim Khan Afridi)
18/01/17
Chairman
Camp Court, A/Abad:

ANNOUNCED
18.01.2017

15.08.2016

Counsel for the appellant and Mr. Muhammad Usman, Senior Clerk alongwith Mr. Muhammad Siddique Sr.GP for the respondents present. Rejoinder submitted. Learned counsel for the appellant requested for adjournment. To come up for final hearing on 18.1.2017 before D.B at camp court. Abbottabad.



Member



Chairman

Camp court, A/Abad

26.08.2015

Appellant in person, M/S Khurshid Khan, SO respondent No. 1, Javed Ahmed, Supdt. for respondent No.2 and Ansar Ahmed, AAO for respondent No. 4 alongwith Addl: A.G for all respondents present. Written reply on behalf of respondent No. 4 submitted while request for further time made on behalf of respondents No. 1 to 3. To come up for written reply/comments on 17.11.2015 before S.B at Camp Court A/Abad as the matter pertains to the territorial limits of Hazara Division.


Chairman

17.11.2015

Appellant in person and Mr. Shafiq-ur-Rehman, ADO alongwith Mr.Muhammad Siddique, Sr.G.P for respondents present. Written reply not submitted. Requested for further adjournment. Last opportunity granted. To come up for written reply/comments on behalf of respondents No.1 to 3 on 21.01.2016 before S.B at Camp Court A/Abad.


Chairman
Camp Court A/Abad.

21.1.2016

Appellant in person and Mr. Shafiq-ur-Rehman, ADO alongwith Mr. Muhammad Saddique, Sr.GP for respondents present. Written reply on behalf of respondents No. 1 to 3 also submitted. The appeal is assigned to D.B for rejoinder and final hearing for 15.8.2016 at Camp Court A/Abad.


Chairman
Camp Court A/Abad

Reader Note:

31.12.2014

Appellant with counsel present. Since the Tribunal is incomplete, therefore, case is adjourned 26.02.2015 for the same.


Reader

26.02.2015

Appellant with counsel present. Learned counsel for the appellant argued that the appellant was appointed as Qari and then promoted as Senior T.T in BPS-16 and that vide notification dated 27.05.2014 he was reverted to the position of Qari without any enquiry etc. That the departmental appeal against the said impugned order was preferred on 24.06.2014 which was not responded within the statutory period and hence the instant appeal on 17.10.2014.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 08.06.2015 before S.B.


Chairman

Appellant Deposited
Security & Process Fee



08.06.2015



Appellant with counsel and Mr. Insar Ahmad, AAO for respondent No. 4 alongwith Addl: A.G for respondents present. Requested for adjournment. To come up for written reply/comments on 26.8.2015 before S.B.


Chairman

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 1245/2014

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	17/10/2014	<p>The appeal of Mr. Muhammad Javed presented today by Mr. Abdul Ghaffar 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	21-10-2014	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>31-12-2014</u></p> <p style="text-align: right;"> CHAIRMAN</p>

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 1245/2014

Muhammad Javed.....Petitioner/Appellant

Versus


Govt. of Khyber Pakhtunkhwa through Secretary Education,
KPK, Civil Secretariat, Peshawar.& others.....Respondents

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S.No.	Description of documents.	Annexure	Dated
1.	Memo of appeal		1-5
2.	Stay application with affidavit.		6-7
3.	Copy of Appointment order	A	8
4.	Copy of service books	B	9-17
5.	Copy of adjustment order	C	18
6.	Copy of promotion order	D	19-22
7.	Copy of application and objection	E	23
8.	Copy of appeal	F	24-25
9.	Copy of service appeal as well as copy of impugned notification .	G	26-32
10.	Copy of Departmental appeal	H	33-36
11.	Wakalatnama		37


Appellant

Through


Abdul Ghaffar Khan
Advocate, Peshawar
Room No.206, Isa Khel Plaza,
Hashtnagri, G.T. Road,
Peshawar
Cell: 0300-5956376

Dated: 11/10/014

(1)

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 1245 /2014

1275
17-10-2014

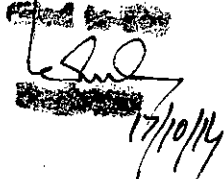
Muhammad Javed T.T GHS Bissian Tehsil Balakot
presently working as "Qari" at GHSS Jared District Mansehra
.....Petitioner/Appellant

Versus

- 1) Govt. of Khyber Pakhtunkhwa through Secretary Education, KPK, Civil Secretariat, Peshawar.
- 2) Director of Education KPK, at Dabgari Garden, Peshawar.
- 3) District Education Officer (Male) Mansehra at Dub.No.1 Manshera.
- 4) Accountant General, KPK, Peshawar.

.....Respondents

**APPEAL U/S 4 OF THE SERVICE TRIBUNAL
ACT 1974 AGAINST THE IMPUGNED
NOTIFICATION NO.3460-64 DATED
27.05.2014 OF THE RESPONDENT NO.2
WHEREBY THE PETITIONER/ APPELLANT
WAS REVERTED FROM THE POST OF S.T.T
BPS-16 TO THE POST OF QARI BPS-12.**


17/10/14
Prayer:

On acceptance of this appeal, the impugned Order/ Notification No.3460-64 dated 27.05.2014 of the respondent No.2 may kindly be set aside and the respondents may kindly be directed to restore the petitioner/ appellant on the post of S.T.T (BPS-16) with all back benefits.

Respectfully Sheweth;

- 1) That the appellant was appointed against the post of "Qari" vide order No.17077-17119 dated 03.11.1986 of respondent No.3 (Appointment order is annexed)
- 2) That the appellant obtained leave w.e.f. 03.12.93 to 02.12.95 vide leave sanctioned DEO(M) Mansehra Endorsement No.9074-76 dated 19.04.1994. (Copy of service books is annexed)
- 3) That on return from leave, the appellant was adjusted against the vacant post of T.T w.e.f. 03.12.1995 by respondent No.3 vide order No.821-25 dated 17.01.1996. (Copy of adjustment order is annexed)
- 4) That later on the scale of the appellant was upgraded from B-9 to B-15 w.e.f. 01.07.2012.
- 5) That the petitioner/ appellant was promoted to post of Senior T.T. by respondent No.2 vide his order No.1925-32 dated 27.02.2013 at S.No.24 on the basis of regular promotion alongwith other similar T.Ts. (Copy of promotion order is annexed)
- 6) That the case of the petitioner/ appellant was sent for fixation of pay in BPS-16, but astonishingly the same was refused by respondent No.4 by putting an objection on the fixation of pay in BPS-16, without any plausible reason. (Copy of application and objection is annexed)

- 7) That the petitioner made an appeal to respondent No.2 in this regard, but the respondent N.2 turned a deaf ear to the request of the petitioner/ appellant in the form of "inaction" on the part of the respondent No.2 (Copy of appeal is annexed)
- 8) That the petitioner/ appellant approached to the service Tribunal in this regard and the proceedings before the services Tribunal were pending adjudication that in the meanwhile through the impugned notification No.3460-64 dated 27.05.2014 issued by respondent No.2, the petitioner/ appellant was reverted from BPS-16 to the post of Qari BPS-12, without any fault on the part of the petitioner/ appellant. (Copy of service appeal as well as copy of impugned notification is annexed)
- 9) That the petitioner/ appellant made a departmental representation to respondent No.1 against the impugned notification, but of no avail. (Copy of Departmental appeal is annexed)
- 10) That having no other efficacious remedy available, the petitioner/ appellant now approaches this Hon'ble Tribunal against the impugned notification on the following grounds inter-alia.

GROUND:

- a. That the impugned notification of respondent No.2 is against law, facts, illegal, unlawful, without lawful authority,

hence untenable in the eyes of law and liable to be set-aside.

- b. That the reversion of the petitioner/ appellant amounts to penalty and that too without any fault, which is against the norms of natural justice as the petitioner/ appellant has been condemned unheard.
- c. That seniority of the petitioner/ appellant has never been objected to by any one in the present cadre during his simultaneous promotions in that cadre, nor even the department has ever objected while promoting the petitioner/ appellant from BPS-7 to BPS-9, 12, 15 and lastly to BPS-16, which shows their implied approval in this behalf.
- d. That the reversion of the petitioner/ appellant is against the rulings of the Superior Courts hence, untenable.
- e. That the respondents himself has adjusted the petitioner/ appellant against the post of T.T and the petitioner has been working in the present cadre for more than 19 years.
- f. That other grounds will be raised at the time of arguments before this Hon'ble Tribunal.

It is, therefore, most humbly prayed that, on acceptance of this appeal, the impugned notification No.3460-64 dated 27.05.2014 of respondent No.2 may kindly be set-aside and the petitioner/ appellant may kindly be

allowed/ restored in BPS-16 as S.T.T. from the date of his promotion to S.T.T with all back benefits.

Any other remedy which this Hon'ble Tribunal deems fit and appropriate in the circumstances of the case may also be awarded to the petitioner/ appellant

[Signature]
Petitioner/ Appellant

Through *[Signature]*

Abdul Ghaffar Khan
Advocate, Peshawar
Cell: 0300-5956376

VERIFICATION

Verified on oath that the contents of the above appeal are true and correct and nothing material has been concealed from this hon'ble Tribunal.

[Signature]
Deponent



6

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _____/2014

Muhammad Javed.....Petitioner/Appellant

Versus

Govt. of Khyber Pakhtunkhwa through Secretary Education,
KPK, Civil Secretariat, Peshawar.& others.....Respondents

**Application for the suspension of the impugned
order/ notification No.3660-64 dated 27.05.2014
till the final disposal of the instant appeal.**

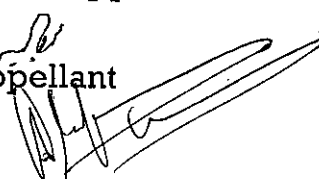
Respectfully Sheweth;

- 1) That the above titled appeal is pending subjudice before this Hon'ble Tribunal in which no date has been fixed.
- 2) That the appeal has been filed on very strong and cogent grounds and the appellant is sanguine of it success.
- 3) That balance of convenience also lies in favour of the petitioner/ appellant.
- 4) That if the operation of the impugned order/ notification is not suspended, it will cause irreparable loss to the petitioner/ appellant

It is, therefore, humbly prayed that, on acceptance of this application, the operation of the impugned order/ notification dated 27.05.2014 may kindly be suspended till the final disposal of the main service appeal.

Appellant

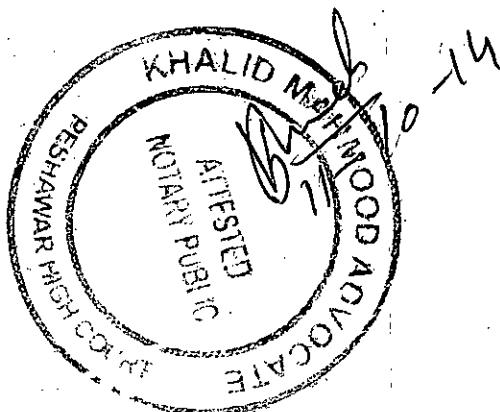
Through


Abdul Ghaffar Khan
Advocate, Peshawar

AFFIDAVIT

I, Muhammad Javed T.T GHS Bissian Tehsil Balakot presently working as "Qasir" at GHSS Jared (appellant), do hereby affirm and declare on oath that the contents of the **Service Appeal** are true and correct to the best of my knowledge and belief and nothing material has been concealed from this hon'ble Tribunal.


Deponent
17301-7380535-7



(A)
8

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MANSEHRA DISTRICT MANSEHRA.

O.O.No. 83

Dated, 3-11- /1986.

APPOINTMENTS.

The following Qaries are hereby appointed against the vacant Qari posts given against each @ Rs.560/-P.M. BPS.7 plus usual allowance as admissible under the rules in the interest of public service w.e.f. the date of their taking-over charge.

<u>S.No.</u>	<u>Name and Address.</u>	<u>School where appointed.</u>	<u>Remarks.</u>
1.	Khalilur Rehman s/o Ali Akber, R/O Murad Pur.	GHS.Nawaz Abad.	Against newly created post.
2.	Mohammad Javed s/o Mohd Younis, R/O Sohachh (Kaghan).	" .Jareed.	--do--
3.	Mohd. Shafi s/o Ghulam Mohd, R/O Behr Mansehra.	" .Chittabatta.	--do--
4.	Gharib Nawaz s/o Mohd Yousif, R/O Shador (Oghi).	" .Shamdihara.	--do--
5.	Abdul Latif s/o Abdul Hayee, R/O Girwal.	" .Khairabad.	--do--
6.	Ibadur Rehman s/o Azizur Rehman, R/O Maloga.	" .Shergarh.	--do--
7.	Habibur Rehman s/o Khalilur Rehman, R/O Kuther via Madan.	" .Palsala.	--do--
8.	Noor ul Islam s/o Noor Ahmed, R/O Kotli Bala.	" .Kotegali.	--do--
9.	Wali Mohd s/o Abdur Rehman, Sarai (Shergarh).	" .Karori.	--do--
10.	Mohd Ayyaz s/o Mohd Younis, C/O Tariq Dawa Khana Mansehra.	" .Sekhai Bala.	--do--
11.	Manzoor ul Haq s/o Abdul Chafoor, Makrya Shinkari.	" .Paras.	--do--
12.	Mohd Haroon s/o Ghulam Hussain, R/O Khan Bali Mong.	" .Behali.	--do--
13.	Wali Ahmed Shah s/o Sakhi Shah, M/Q DEO(F) Mansehra.	" .Ttershisha.	--do--
14.	Rasool Khan s/o Mohd Hussain, P.M.A.Khakul.	" .Chanool.	--do--
15.	Auranzzeb s/o Mohd Miskeen	" .Oghi.	--do--
16.	Matiullah s/o Said Akber, R/O Battamori.	" .Shungli payeen.	--do--
17.	Mohd Iqbal s/o Mohd Yaqub, R/O Tikri Bandigo.	" .Tikri Bandigo.	--do--
18.	Mohd Umer s/o Abdul Majid, R/O Battamori.	" .Paimal Sharif.	--do--
19.	Mohd Amin s/o Abdul Aziz, R/O Matta Maidan.	" .Gijbori.	--do--
20.	Fazal-e-Qader s/o Ghulam Hayder, R/O Char Bagh Kuzabanda.	" .Bari.	--do--

ATTEST

Sd/-

(Khurshid Ahmed)
DISTRICT EDUCATION OFFICER
(M) MANSEHRA.

Contg: Page 2.

CONDITIONS

1. Charge Report should be submitted to all concerned.
2. No TA/DA is allowed to any one.
3. Their appointments are purely temporary and liable to termination at any time with out any resion/notice.
4. They should produce their Age and Health certificate from M/S DHQ Hospital Mansehra.
5. They should not be handedover charge if their Age is below 18 years and above 30 years.
6. Their original certificate may please be checked before handingover charge.

sd -

DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA.

Enc. No. 17077-17119 /Dated Mansehra the, 3-11- /1986.
Copy of the above is forwarded for information to the:-

1. Director of Education (Schools) Hazara Division Abbottabad.
- 2- 21. Headmaster of Govt:High Schools concerned in Mansehra District.
- 22-41. Candidates concerned.
42. District Accounts officer Mansehra.
43. C.O. File.

M. Gul
3/11/86
DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA.

ATTESTED

Handwritten marks: a circled '4' and a circled '9'.

Hairs,

1.

2.

Passed BA Exam under R.No M 438120
Session 2008

Passed Bachelors of Education Session 1987
from Darul-Uloom A313, Upper Koyal
Islamabad obtaining marks 600/438.
Results declared May 1987

Verification Roll No.

dated 27-8-2009

Marks obtained

64% and placed in grade B and

Result declared 27-8-2009 from Open University

Islamabad verified by the concerned University

NO, 645 of 873/2010 Left thumb-impression.

Signature: G. Manshehra

Passed Training of Teaching Tajweedul Quran
from Jamiat Talimul Quran Alam-giri Road
Karachi

DISTRICT OFFICER (MALE)
ELTY. & SECY. EDUCATION
MANSEHRA

Signature: Manshehra

Qualification	Grade	Year	Date
English	✓	Passed F.A. Exam Durges Session 1988	553/1100 marks
Urdu		Headmaster Govt. High School Jareed (Mans)	1-1-89
Plan-drawing		Headmaster Govt. High School Jareed (Mans)	1-1-89
Court duties		Headmaster Govt. High School Jareed (Mans)	
Reserve duties		Headmaster Govt. High School Jareed (Mans)	

Qualifications	Date
Passed SSC (S) Exam, 1985	
Under Roll No 10511 obtaining 403 marks "B" grade. Result declared in 1985. From the B.S.S.P. Peshawar.	
B. L. or B. A.	
Pleadership examination	
Training School Final examination	
Other qualifications—	
2) Passed Qirat Exam, 1986 under Roll No. 1317 from Tajweedul Quran Jamia Madina Peshawar	
3) Passed Hijz ul Quran Magadala - dia, Kot-Nagebullah.	

N. B.—Aino to be drawn under the qualification possessed.

ATTESTED

Note: The entries in this page should be renewed or re-attested at least every five years and the signature to lines 9 and 10 should be dated.

1. Name *Mohammad Javed*

NIL NO, 123-92-55710

(13)

(10)

File No, 00225307

2. Race *Sawali*

3. Residence *Sobach Kaghan*

4. Father's name and residence *Mohammad Younis To Sobach Kaghan*

5. Date of birth by Christian era as nearly as can be ascertained *(31-12-1963)*
31st December N.H. 4 Sixty Three.

6. Exact height by measurement *5-4*

7. Personal marks for identification... *A mole on the left & right side of throat.*

8. Left hand thumb and Finger impression of (non-gazetted) officer

Little Finger.

Ring Finger

Middle Finger.

Fore Finger

Thumb.

Re-attested
Shool

Principal
Govt High School
Jared Distt Manselhra

9. Signature of Government servant *M. Javed*

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

Mohd. Khan
Head Master
Govt. High School
Jared Distt Manselhra

ATTESTED

78/81/37

843/2/5

1 Name of post	2 Whether substantive or officiating and whether permanent or temporary	3 If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	4 Pay in substantive post	5 Additional Pay for officiating	6 Other emolument falling under the term "Pay"	7 Date of appointment	8 Signature of Government servant
Qari G.H.S. Jareed	sub/ff	B.P.S - 7	560-23-1020			6-11-86	M. Jareed
- DO -	"	Revised scale B.P.S-7	750-31-1370	J			
- DO -	"		750/-	9/10		1-7-87	M. Jareed
- DO -	-		781/-			1-12-87	M. Jareed
- DO -	-		812/-	✓		1-12-88	M. Jareed
- DO -	-		843/-			1-12-89	M. Jareed
- DO -	-	Revised B.P.S 7 Rs.	874/- 24/- 1095-2-1095		12/90		M. Jareed
G.H.S. Jareed	"		1335/- pm		6/91		M. Jareed
- DO -	"		1395/- pm		12/91		M. Jareed
Passed P.A. Exam during the session 1988, securing 553 1/2 marks under Roll No. 19798 in Ind div. (D-Grade) Result declared on 1-1-89 L. Shamail H.M. G.H.S. JAREED		(6) Service verified w.e.f. 5-9-89 to 30-11-90 from the file of roll and other school record L. Shamail H.M. G.H.S. JAREED					
Passed E.T. Exam. during session 1990 condense course under Roll No. 2290 securing 213 marks in Ind div. Result declared on 14-3-91. L. Shamail Headmaster Govt. High School Jareed (Mnsr)		(7) Service verified w.e.f. 1-12-31-12-91 from the file of roll other school record. L. Shamail Headmaster Govt. High School Jareed (Mnsr)					

ATTESTED

15
1/5/85

874
42
936

Appointed
Dh. 36/12 PM. APS
vide D.O. No. 83 D/13
(M) Man
3-11

Sl. No. and name of the office or posting (Sl. No. 1 to 8)	Date of termination of 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	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
					Allocation of period of leave on average pay upto four months for which leave salary is debit to another Government	Period to which Government to which debit		

30/6/87 Revised pay scale
Kansal

① Services verified w.e.f. 6.11.86 to 19-1-87 from the original and office record.
H.M. JARED
G.H.S. JARED

30/11/87 Inc. [Signature] Headmaster
GOVT. HIGH SCHOOL
Jaraed (Mansohra)

② Services verified w.e.f. 20-1-87 to 30-11-87 from acquittances & office records
[Signature] Headmaster
GOVT. HIGH SCHOOL
Jaraed (Mansohra)

30/11/88 Inc. [Signature] Headmaster
GOVT. HIGH SCHOOL
Jaraed (Mansohra)

③ Services verified w.e.f. 1-12-87 to 1-2-88 (B.M.) from Acq: rolls & office record.
[Signature] Head Master
Govt. High School
Jaraed Dist. Mansohra

30/11/89 Inc. [Signature] Headmaster
GOVT. HIGH SCHOOL
Jaraed (Mansohra)

④ Services verified from 2-2-88 to 30-11-88 from acq: rolls & office record.
[Signature] Head Master
Govt. High School
Jaraed Dist. Mansohra

30/11/89 Inc. [Signature] Headmaster
GOVT. HIGH SCHOOL
Jaraed (Mansohra)

⑤ Services verified w.e.f. 1-12-88 to 4-9-89 from acquittances rolls & other office record.
[Signature] Head Master
Govt. High School
Jaraed Dist. Mansohra

30/11/89 Inc. [Signature] Headmaster
GOVT. HIGH SCHOOL
Jaraed (Mansohra)

Pay fixed at Rs 750-31-1370 (B-7) with next increment on 1-12-1987

Accounts Officer
Day fixation

ATTESTED

Drawn amount of Rs 700
w.e.f. 7/89 to 12/89 Rs. 289/2
vide no. 459 dt. 14/3/90

1 Name of post	2 Whether substantive or officiating and whether permanent or temporary	3 If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	4 Pay in substantive post	5 Additional Pay for officiating	6 Other emolument falling under the term "Pay"	7 Date of appointment	8 Signature of Government servant	9 Signature of Head of office or other officer of col
<i>Revised Entries w.e / 1-1-89 (Date of Passing FA)</i>								
<i>Q.A.S. Jared</i>	<i>Off/Temp.</i>		<i>874/- P.M.</i>	<i>✓</i>		<i>1/989</i>	<i>M. Jand</i>	
<i>Do</i>	<i>Do</i>		<i>905/- P.M.</i>	<i>✓</i>		<i>1/1989</i>	<i>M. Jand</i>	
<i>Do</i>	<i>Do</i>		<i>936/- P.M.</i>	<i>✓</i>		<i>1/90</i>	<i>M. Jand</i>	
<i>Do</i>	<i>Do</i>		<i>957/- P.M.</i>			<i>14/3/91</i>		
<i>Revised Scale No-7 (R-1095-60-1995)</i>								
<i>Bari</i>		<i>Formula B9(100) Minimum 9m P22 HRA</i>						
<i>Q.A.S. Jared</i>	<i>Off/Temp.</i>		<i>1455/- P.M.</i>	<i>✓</i>		<i>1/91</i>	<i>M. Jand</i>	
<i>- Do -</i>	<i>Do</i>		<i>1515/- P.M.</i>	<i>✓</i>		<i>1/91</i>	<i>M. Jand</i>	
<i>C.H.S</i>			<i>1515/- P.M.</i>			<i>4/92</i>	<i>M. Jand</i>	
<i>KANSHIAN</i>			<i>1575/- P.M.</i>			<i>12/92</i>	<i>M. Jand</i>	
<i>P.H.S</i>						<i>12/93</i>	<i>M. Jand</i>	
<i>KANSHIAN</i>								
<i>P.H.S. KANSHIAN</i>		<i>TWO advance increments on FA</i>						
		<i>Office of the Accounting Officer</i>	<i>1633/- P.M.</i>					
		<i>N.W.D. Pathan</i>						
		<i>Pay Band in the Revised Pay Scale 1991</i>						
		<i>of Rs. 1095-60-1995 - 71</i>						
		<i>@ Rs. 1455/- P.M. 1-1-89</i>						
		<i>With New Increment on 1-1-1991</i>						
		<i>Accounts Officer</i>						
		<i>The Public Officer</i>						

ATTESTED

9	10	11	12	13	14	15
Signature and designation of the head of the office or other attesting officer in attestation (columns 1 to 8)	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Leave		Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government Period to which debitable	
Lunthamrao G.S.S. JAMNAR	30/11/89	Inc:	Lunthamrao G.S.S. JAMNAR			<p style="text-align: right;">(17)</p> <p>Drawn across of by form 1/89 to 30/11/89 R. 2570/-</p> <p>vide No. 1505 dt. 30/11/89</p> <p style="text-align: right;">J. D. Patil 9/11</p> <p>Service verified w.e.f. 1/92 to 31-3-92 from the Acquittance Roll and other school record.</p> <p style="text-align: right;">Headmaster Govt. H.M. Lunthamrao Jamnara (Maur)</p> <p>Service verified w.e.f. 1-4-92 to 30-11-92 from the Acq. Roll and other record of this school.</p> <p style="text-align: right;">Govt. H.M. G.H.S. KANSHIAN</p> <p>Service verified w.e.f. 1-12-92 to 30-11-93 from the Acq. Roll and other record of this school.</p> <p style="text-align: right;">Govt. H.M. G.H.S. KANSHIAN</p>
Lunthamrao G.S.S. JAMNAR	30/11/89	Inc:	Lunthamrao G.S.S. JAMNAR			
Lunthamrao G.S.S. JAMNAR	31/5/91	Scale Revised	Lunthamrao G.S.S. JAMNAR			
Lunthamrao G.S.S. JAMNAR	31/9/91	Scale Revised	Lunthamrao G.S.S. JAMNAR			
Lunthamrao G.S.S. JAMNAR	31/9/91	Scale Revised	Lunthamrao G.S.S. JAMNAR			
Lunthamrao G.S.S. JAMNAR	30/11/91	Inc:	Lunthamrao G.S.S. JAMNAR			
Lunthamrao G.S.S. JAMNAR	31/3/92	Transfer	Lunthamrao G.S.S. JAMNAR			
Gandhi G.S.S. KANSHIAN	30/11/92	Inc:	Gandhi G.S.S. KANSHIAN			
Gandhi G.S.S. KANSHIAN	30/11/93	Inc:	Gandhi G.S.S. KANSHIAN			
Gandhi G.S.S. KANSHIAN	31/5/94	Scale Revised	Lunthamrao G.S.S. KANSHIAN			

ATTESTED

Temp. p - 65

Drawn across L.S. U.E. of 3-12-93 to 24-2-94.

vide M. No. 158 dt. 14-6-87

Amounting to Rs. 5933/79

Headmaster
G.H.S. Kanshian

District Accounts Officer

1	2	3	4	5	6	7	8	9
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature of Government servant	Signature of other officer in column
BRS NO. 7 1480-81-2695								
Qari								
Gus Kanshan	Off./Temp.		2209/-			1 $\frac{6}{94}$	M Jand	
-do-	"		2209/-			1 $\frac{12}{94}$	M Jand	
-do-	"		2209/-			1 $\frac{12}{95}$	M Jand	
(TT) G. B. S. Khan	"		2209/-			3 $\frac{12}{95}$	M Jand	
<p>Revised scale B.P. No. 8 (1540-88-2860) Passed PA Exam:</p> <p>2244 $\frac{6}{94}$</p> <p>2156 $\frac{12}{94}$</p> <p>2244 $\frac{12}{95}$</p> <p>2244 $\frac{12}{95}$</p>								
<p>Pay revised in (B-9) being FA (D. Div.) w.e.f. 1-6-91. B-9 Rs 1185-72-2265.</p>								
N	Off. Temp.		1473/-			1 $\frac{6}{91}$	M Jand	
N	"		1545/-			1 $\frac{12}{91}$	M Jand	
N	"		1617/-			1 $\frac{12}{92}$	M Jand	
N	"		1689/-			1 $\frac{12}{93}$	M Jand	
<p>Remd on E/Leave w.e.f. 3 $\frac{12}{93}$ &</p>								

ATTESTED

0 10 11 12 13 14 15

(13)

Nature and date of the office or attesting in attestation forms 1 to 8	Date of termination of 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 on average pay upto four months for which leave salary is debitable to another Government.	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government servant.
					Government Period to which debitable		

Shammy 30¹¹/₉₄ Fric. L. Shammy
 H.H. G.H.S. Kanchian

Service verified w.e.f 1-12-93 to 2-12-95 from Reg. Rolls + other record of this school.

Shammy 30¹¹/₉₅ Fric. L. Shammy
 H.H. G.H.S. Kanchian

Shammy 12/2/95 Fric. L. Shammy
 G.H.S. Kanchian

L. Shammy
 H.H. G.H.S. Kanchian

~~DEO (M) Secy. D. Chra 5/94 Passed RA 2000 J.E. U.M. Secy. M. Chra~~

~~DEO 30¹¹/₉₄ Rizeo~~

~~DEO Exco~~

~~DEO 30¹¹/₉₁ Gne~~

~~DEO 30¹¹/₉₂ Gne~~

~~DEO 30¹¹/₉₃ Gne~~

~~DEO 30¹¹/₉₅ Publi~~

ATTESTED

1 Name of post	2 Whether substan- tive or officiating and whether permanent or temporary	3 If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	4 Pay in substantive post	5 Additional Pay for officiating	6 Other emolument falling under the term "Pay"	7 Date of appointment	8 Signature of Government servant
T-T.		B-9 R ₃ 1605-97-3060					
G.M.S Swain	Off. Temp.		2284 1/2	UT		3 12/95	M. Jand
T-T							
G.M.S No. Kot	Off. Temp.		2284 1/2			3 6/96	M. Jand
— Do —	"		2381/-			1 12/96	M. Jand
— Do —	— Do —		2478 1/2			1 12/97	M. Jand
— Do —	— Do —		2575/-			1 12/98	M. Jand
T T							
G.M.S, Nankot	— do —		2672/-			1 12/99	M. Jand
N	N		2769 1/2			1 12/2000	M. Jand
N	N		2864 1/2			1 12/2001	M. Jand
		B-7 R ₃ 2410-145-6760					
N	N		4297 =			1 12/2000	M. Jand
N	N		4440 =			1 12/02	M. Jand
G.M.S Shahel Nazuliah	"		4587 =			1 12/2003	M. Jand
— do —			4730/-			1 12/2004	

ATTESTED

9	10	11	12	13	14	15
				Leave		Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
Signature and designation of the head of the office or other attesting officer in attestation (columns 1 to 4)				Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
Date of termination of appointment				Nature and duration of leave taken		Signature of the head of the office or other attesting officer
Reason of termination (such as promotion, transfer, dismissal, etc.)				Signature of the head of the office or other attesting officer		
				Period		Government to which debitable
<i>[Signature]</i>	2/6/96	<i>[Signature]</i>	<i>[Signature]</i>	<i>[Signature]</i> District Officer Mansehra		Service verified w.e.f. 3-12-95 to 31-12-96 from Acq. Roll and other school records. <i>[Signature]</i> District: Education Officer (M) Secy Manshehra
<i>[Signature]</i>	11/30/98	<i>[Signature]</i>	<i>[Signature]</i>	<i>[Signature]</i> District: Education Officer (M) Secy Manshehra		Service verified w.e.f. 1-1-97 to 31-12-97 <i>[Signature]</i> District: Education Officer (M) Secy Manshehra
<i>[Signature]</i>	11/30/99	<i>[Signature]</i>	<i>[Signature]</i>	<i>[Signature]</i> D.O (Admn & Dev) Secy Edu, Manshehra		Service Verified w.e.f. 1-1-98 to 30-11-98 from Acq. Roll and other Record of this Office. <i>[Signature]</i> D.E.O. (M) Manshehra
<i>[Signature]</i>	11/30/01	<i>[Signature]</i>	<i>[Signature]</i>	<i>[Signature]</i> D.O (Admn & Dev) Secy Edu, Manshehra		Service Verified w.e.f. 1-12-98 to 30-11-99 from Acq. Roll and other Record of this Office. <i>[Signature]</i> D.E.O. (M) Manshehra
<i>[Signature]</i>	11/30/02	<i>[Signature]</i>	<i>[Signature]</i>	<i>[Signature]</i> D.O (Admn & Dev) Secy Edu, Manshehra		Service verified from 1-12-99 to 30-11-2001 from the acquittance rolls & other office record maintained in this school/office. <i>[Signature]</i> D.O (Admn & Dev) Secy Edu, Manshehra
<i>[Signature]</i>	6/6/03	<i>[Signature]</i>	<i>[Signature]</i>	<i>[Signature]</i> D.O (Admn & Dev) Secy Edu, Manshehra		Service verified w.e.f. 1-12-99 to 6-6-2003 from the record of this office. <i>[Signature]</i> D.O (Admn & Dev) Secy Edu, Manshehra
<i>[Signature]</i>	30/11/2004	<i>[Signature]</i>	<i>[Signature]</i>	<i>[Signature]</i> Principal G.H.S. Shohel Manzila		
<i>[Signature]</i>	30/6/2005	<i>[Signature]</i>	<i>[Signature]</i>	<i>[Signature]</i> Principal G.H.S. Shohel Manzila		

ATTESTED

DISTRICT OFFICER
SECY: EDUCATION

14

1 Name of post	2 Whether substantive or officiating and whether permanent or temporary	3 If officiating state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	4 Pay in substantive post	5 Additional Pay for officiating	6 Other emolument falling under the term "Pay"	7 Date of appointment	8 Signature of Government servant
<i>Revised Pay Scale w.e.f 1-07-2005</i>							
<i>@ (2770-165-7720)</i>							
<i>GHS</i> <i>Shohal Mazzeleh</i>			<i>5410/-</i>			<i>11/2/2005</i>	<i>[Signature]</i>
<i>— do —</i>			<i>5577/-</i>			<i>11/2/2005</i>	<i>[Signature]</i>
		<i>2005</i> <i>Office of The Assistant General</i> <i>Public</i> <i>Basic</i> <i>OF RS 2770-165-7720</i> <i>AT RS. 5410/-</i> <i>With Next</i> <i>Pay Fixation</i> <i>[Signature]</i>					
			<i>5740/-</i>			<i>11/2/2006</i>	<i>[Signature]</i>
			<i>Scale Revised w.e.f. 01-07-2007</i> <i>@ 3185-190-8885</i>				
			<i>6605/-</i>			<i>01/2/2007</i>	<i>[Signature]</i>
<i>GHS</i> <i>Shohal Mazzeleh</i>			<i>6795/-</i>			<i>11/2/2007</i>	<i>[Signature]</i>
		<i>B-9</i> <i>Scale Revised @ (3820-230-10720)</i>					
			<i>Rs. 8190/-</i>			<i>11/2/2008</i>	<i>[Signature]</i>
			<i>Rs. 8420/-</i>			<i>11/2/2008</i>	<i>[Signature]</i>

ATTESTED

15

Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of 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	Leave Allocation of period of leave on average pay upto four months for which leave salary is payable to another Government	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
						Service verified from 10/31/12-2003 rolls and other office record maintained in this School.	
						Service verified from 10/31/11-2004 rolls and other office record maintained in this School.	
					<p>(1994) Office of the Accountant General N. W. F. P. Peshawar Pay fixed in the revised basic pay scale 1994 of Rs. 11,850-22,650-9, 11473/- M.W.E. 1-12-1994 with next increment on 1-12-1994</p> <p>Accounts Officer Pay fixation Party N. W. F. P. Peshawar</p>	Service verified from 10/31/12-2003 rolls and other office record maintained in this School.	
					<p>Office of the Accountant General N. W. F. P. Peshawar Pay fixed in the revised basic pay scale 1994 of Rs. 24,400-45,675-9, 22,890/- M.W.E. 1-12-1994 with next increment on 1-12-1994</p> <p>Accounts Officer Pay fixation Party N. W. F. P. Peshawar</p>	Service verified from 10/31/12-2003 rolls and other office record maintained in this School.	
					<p>Office of the Accountant General N. W. F. P. Peshawar Pay fixed in the revised basic pay scale 2000 of Rs. 31,100-45,675-10PS 9, 29,295/- M.W.E. 1-12-2001 with next increment on 1-12-2002</p> <p>Accounts Officer Pay fixation Party N. W. F. P. Peshawar</p>	Service verified from 10/31/12-2003 rolls and other office record maintained in this School.	

Revised 1991
E.A. No. 201

(1994)
Office of the Accountant General
N. W. F. P. Peshawar
Pay fixed in the revised basic pay scale 1994
of Rs. 11,850-22,650-9,
11473/- M.W.E. 1-12-1994
with next increment on 1-12-1994

Accounts Officer
Pay fixation Party N. W. F. P. Peshawar

Office of the Accountant General
N. W. F. P. Peshawar
Pay fixed in the revised basic pay scale 1994
of Rs. 24,400-45,675-9,
22,890/- M.W.E. 1-12-1994
with next increment on 1-12-1994

Accounts Officer
Pay fixation Party N. W. F. P. Peshawar

Office of the Accountant General
N. W. F. P. Peshawar
Pay fixed in the revised basic pay scale 2000
of Rs. 31,100-45,675-10PS 9,
29,295/- M.W.E. 1-12-2001
with next increment on 1-12-2002

Accounts Officer
Pay fixation Party N. W. F. P. Peshawar

PRINCIPAL
GHS Shohal Mazulla
Mansehra

Principal
G.H.S. Shohal Mazulla

Principal
G.H.S. Shohal Mazulla

PRINCIPAL
GHS Shohal Mazulla
Mansehra

PRINCIPAL
G.H.S. Shohal Mazulla

PRINCIPAL
G.H.S. Shohal Mazulla

ATTESTED

Under the Provision of rule 10(2) I do hereby opt for relaxation of my pay in BPS.15 on 02-12-2012 after availing my Annual Increment in the lower grade on 01-12-2012.

1 Name of post	2 Whether substantive or officiating and whether permanent or temporary	3 state (i) substantive appointment, or (ii) whether service counts for pension under Art. 374 C S. R.	4 Pay in substantive post	5 Additional Pay for officiating	6 Other emolument falling under the term "Pay"	7 Date of appointment	8 Signature of Government servant	9 Signature and designation of the officer in a column
T.T GMS, DARA SHOHAL	B-9	(3820-230-10720)	8420/-	/	/	18/10/2009	[Signature]	[Signature]
-D-	Pentt:	-D-	8650/-	/	/	12/2009	[Signature]	[Signature]
-D-	-D-	-	8880/-	/	/	12/2010	[Signature]	[Signature]
-D-	1-7-2011	(Revised BPS No 9)	(6200-380-17600)	/	/	7/2011	[Signature]	[Signature]
-D-	-D-	-	14560/-	/	/	7/2011	[Signature]	[Signature]
-D-	-D-	-	14940/-	/	/	12/2011	[Signature]	[Signature]
<p>Scale up - Granted to (BIS) 8500-700-29500</p> <p>6605/97</p> <p>8190/98</p> <p>14560/99</p> <p>S: 270</p> <p>Pay change in 9/2012</p> <p>@ 15500 - due to B-7 15500-</p>			15500/-	/	/	7/2012	[Signature]	[Signature]

ATTESTED

16

Signature and designation of the head of the office or other attesting officer in attestation columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer	Natural and duration of leave of leave on average pay upto four months for which leave salary is payable to another Government	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
	30/11/2009	Incet				Service verified w.e.f 01/01/09 to 12/10/2009 from School Record. PRINCIPAL GHS Shohal Mazuliah Mansehra
	30/11/2010	Incet				
	30/6/2011	Scale Revised				SNO - Pay Actin 11/1/11
	30/11/2011	Inc.				Service verified from 18-10-2011 to 30-11-2011 in the acquittance rolls & other office record maintained in this school/office.
	31/7/2012	Scale up Graded				
	30/11/2012	9m				C.P.R. amount sanctioned vide G.O. No. 83 of 2012 Mansehra Endst: No. 3081-83 dt 20/11/12 amounting to Rs. 50000/-

ATTESTED

74832
28/12/14
On 25/12/14
50000/-
District Officer (Male) (E&S) Edu: Mansehra

1 Name of post	2 Whether substantive or officiating and whether permanent or temporary	3 If officiating, (i) substantive appointments, or (ii) whether service counts for pension under Art. 371 C. S. R.	4 Pay in substantive post	5 Additional Pay for officiating	6 Other emolument falling under the term "Pay"	7 Date of appointment	8 Signature of Government servant
<p>T-7 CIMS, Dara Shohol S/T-T CIMS P. BISSIAN</p>	<p>OFFICER IN CHARGE Pay Band 2011 620-380-12600-9 AT RS. 15400/- With No. 12-2011 Mandhemud Accounts Officer Pay Fixation Party K. Pankaj Chandra Pushra A. 12/01</p>	<p>13-15 (8500-700-29500)</p>	<p>15500/- Rs. 15600/- PM</p>	<p>OFFICE OF THE GENERAL PAY BAND OF RS 3800-230-10720 AT RS 8190/- With No. 12-2008 Mandhemud Pay Fixation</p>	<p>12/1/2012 2012 2013</p>	<p>Signature of Government servant</p>	

ATTESTED

Signature of the officer in charge of column

9	10	11	12	13	14	15
Signature and designation of the head of the office or other attesting officer in attestation columns 1 to 3	Date of termination of appointment	Reason of termination (such as promotion, transfer, discharge, etc.)	Signature of the head of the office or other attesting officer	Leave		Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government	
				Period	Government to which debitable	

17

Service verified from 1-12-2009 to 30-11-2010 from the acquittance rolls & other office record maintained in this school/office.

District Officer (In-charge) Edu: Manshehra

Sanctioned GPF Advance amounting to Rs. 80000/- vide G.O. F&S Edu: Manshehra Emdest: No. 12505-4 dt: 17/8/2011.

OFFICE OF THE DISTRICT OFFICER (In-charge) Edu: Manshehra
 DISTRICT OFFICER (In-charge) Edu: Manshehra
 1-12-2007
 1-12-2007

DISTRICT OFFICER (In-charge) ELEMENTARY & SECONDARY EDUCATION MANSHEHRA

Drawn Rs. 80000/- vide G.O. dt. 13-9-2011

3207
 D.O. Manshehra

Manshehra 2013
 Transfer/ Promotion B-16
 Manshehra

Service verified from 1-12-2010 to 30-11-2011 from the acquittance rolls & other office record maintained in this school/office.

District Officer (In-charge) Edu: Manshehra

Service verified from 1/2011 to 01/3/2013 from Acq. Roll and other Record of the Office.

D.O. Manshehra

ATTESTED

18

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) SECONDARY MANSEHRA.
ADJUSTMENT.

On return from leave Mr. Mohammad Javed, Qari is hereby adjusted against the vacant post of T.T on his own pay and grade at GMS, Suwan w.o.f 3-12-1995 in the interest of public service.

NOTE:-

- 1. Charge report should be submitted to all concerned.




(FAZALUR-RAHIM)
DISTRICT EDUCATION OFFICER
(MALE) SECONDARY MANSEHRA

Inspected by: Mr. Rafiq ul Haq, District Education Officer, Mansehra

Encl: No. 821-25 / AB-1000 dated Mansehra the 17-1 /1996.

Copy to the:-

- 1. District Accounts Officer, Mansehra.
- 2. Headmaster Govt; Middle School, Suwan.
- 3. ADO (Accounts) Local Office, Suwan.
- 4. Official concerned.


DISTRICT EDUCATION OFFICER
(MALE) SECONDARY MANSEHRA.

ATTESTED

PROMOTION ORDER TT (M) B-16

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MANSEHRA.

NOTIFICATION

19

In pursuance to the Notification issued by the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar vide Endst:3272-78/ F.No.1 Promotion Senior TT B-16 dated 21-02-2013, the following Seventy Four (74) (M) TTs B-15 were promoted to the post of Senior TT B-16 @ (Rs.10000-800-34000) plus usual allowances as admissible under the rules on regular basis under the existing recruitment policy of the Provincial Government on the terms & condition given below as hereby adjusted at the stations noted against their names with immediate effect.

S.#	S.L.#	NAME OF TEACHER	PRESENT STATION	PLACE OF POSTING	REMARKS
1	15	ABDUR RASHEED	GHS MOHAR	GHS MOHAR	Promoted & posted as Senior TT B-16 against the same station
2	17	M.YOUNAS	GHS L/NAWAB	GHS L/NAWAB	Promoted & posted as Senior TT B-16 against the same station
3	26	M.ANWER	GHS KAJLA	GHS KAJLA	Promoted & posted as Senior TT B-16 against the same station
4	32	QARI BASHIR AHMAD	GHS BANDI PAROW	GHS BANDI PAROW	Promoted & posted as Senior TT B-16 against the same station
5	33	MUHAMMAD IQBAL NADEEM	GMS BALAKOT	GHS BALAKOT	Promoted & posted as Senior TT B-16 against Mr.Khushal at S.# 75
6	41	GHULAM DIN	GHS HARI MERA	GHS HARI MERA	Promoted & posted as Senior TT B-16 against the same station
7	58	ABDUL RASHEED	GHS DATTA	GHS DATTA	Promoted & posted as Senior TT B-16 against the same station
8	63	HABIB UR REHMAN	GHS DILBOR	GHS DILBORI	Promoted & posted as Senior TT B-16 against the same station
9	71	MUHAMMAD RIAZ UL HAQ	GHS NO.1 MANSEHRA	GHS NO.1 MANSEHRA	Promoted & posted as Senior TT B-16 against the same station
10	72	MAQBOO UR REHMAN	GHS SHAMDARA	GHS SHAMDARA	Promoted & posted as Senior TT B-16 against the same station
11	86	S DILDAR SHAH	GMS TANDA	GHS SHINKIARI	Promoted & posted as Senior TT B-16 against Mr.Rafaqat at S.# 76
12	87	MUHAMMAD IRFAN	GHS NAMBAL	GHS NAMBAL	Promoted & posted as Senior TT B-16 against the same station
13	90	AMJAD SAIED	GHS NO.1 MANSEHRA	GHS NO.2 MANSEHRA	Promoted & posted as Senior TT B-16 against Mr.Abdus Salam S.# 77
14	94	MUHAMMAD SHAFIQUE	GMS KHAKOC	GHS MALOOKRA	Promoted & posted as Senior TT B-16 against Mr.Miskeen S.# 101
15	95	Q.M IDREES	GHS NEW DAREAND	GHS NEW DARBAND	Promoted & posted as Senior TT B-16 against the same station
16	97	KHALID MEHMOOD	GMS TUMBAR	GHS BAJNA	Promoted & posted as Senior TT B-16 against Mr.M.Pervez S.# 16
17	100	MOHD IDRIS	GHS PHULRA	GHS PHULRA	Promoted & posted as Senior TT B-16 against the same station
18	102	FAKHAR ULL ISLAM	GHS JABA	GHS JABA	Promoted & posted as Senior TT B-16 against the same station
19	103	SARAJ UD DIN	GHS BALAKOT	GHS BALAKOT	Promoted & posted as Senior TT B-16 against the same station
20	106	MUHAMMAD TAHIR	GMS CHAKLI PANSIAL	GHS CHANDOOR	Promoted & posted as Senior TT B-16 against Mr.Shabir Ahmad S.# 80
21	107	Q ABDUL MALIK	GMS TAPHARRI	GHS GARWAL	Promoted & posted as Senior TT B-16 against Mr.Atra ul Haq S.# 81
22	113	S.AFZAL HUSSAIN SHAH	GHS PAIRAN	GHS PAIRAN	Promoted & posted as Senior TT B-16 against the same station
23	114	Q WAHEED UZ ZAMAN	GHS MOHANDRI	GHS MOHANDRI	Promoted & posted as Senior TT B-16 against the same station
24	115	MUHAMMAD JAVED	GMS DARA SHOHAL	GHS BISSIAN	Promoted & posted as Senior TT B-16 against Mr.Naseer Ahmad S.# 82
25	120	ABDULLAH	GMS THATHI KHURD	GHS MOORAT MERA	Promoted & posted as Senior TT B-16 against Mr.M.Anil S.#83

03335028898
 ATTA
 11/6/2013

(Signature)

ATTESTED

PROMOTION ORDER TT (M) B-16

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26	126	MOHD BASHIR	GHS G H ULLAH	GHSS G H ULLAH	Promoted & posted as Senolor TT B-16 against the same station
27	130	AZIZ UR REHMAN	GMS GULI BAGH	GJS TRANGRI BALA	Promoted & posted as Senolor TT B-16 against Mr.M.Yousaf S.#84
28	132	ABDUL WAHID	GMS BAI RAJNA	GHSS SHERGARH	Promoted & posted as Senolor TT B-16 against Mr.Zaman Shah S.#05
29	134	ABDUR RASID	GHS CHITTA BATTI	GHS CHITTA BATTI	Promoted & posted as Senolor TT B-16 against the same station
30	138	MUHAMMAD RAFIQ	GMS SATHAN GALLI	GHS SATHAN GALLI	Promoted & posted as Senolor TT B-16 against Mr.M.Shahid Ahmad S.#08
31	140	RASHEED AHMAD	GHS ICHRIAN	GHS BAFFA	Promoted & posted as Senolor TT B-16 against Mr.Abdul Hakeem S.#07
32	141	MUHAMMAD RAFIQ	GMS TARWARA	GHS KOLIKA	Promoted & posted as Senolor TT B-16 against Mr.Qasim Ullah S.#00
33	142	HAFIZ MUHAMMAD SIDDIQUE	GHSS PERHINA	GHSS PERHINA	Promoted & posted as Senolor TT B-16 against the same station
34	145	M.ZAMAN	GHS DADAR	GHS DADAR	Promoted & posted as Senolor TT B-16 against the same station
35	146	FAYYAZ MUHAMMAD	GHSS KARORI	GHSS KARORI	Promoted & posted as Senolor TT B-16 against the same station
36	147	MOHD NIAZ	GMS KOTKAY	GHS LABARKOT	Promoted & posted as Senolor TT B-16 against Mr.Jalir Shah S.#09
37	148	INHAMULLAH	GMS NOKOT	GHS TALHATTA	Promoted & posted as Senolor TT B-16 against Q.Abdur Raul S.#90
38	149	ABDUL RASHEED	GHS HUSSAINIAN	GHS HUSSAINIAN	Promoted & posted as Senolor TT B-16 against the same station
39	150	NAZIR AHMAD	GHS RAMKOT	GHS RAMKOT	Promoted & posted as Senolor TT B-16 against the same station
40	151	M ANWAR	GHS GANDHIAN	GHS GANDHIAN	Promoted & posted as Senolor TT B-16 against the same station
41	152	AZIZ UR REHMAN	GHS TIMBER KHOLA	GHS TIMBER KHOLA	Promoted & posted as Senolor TT B-16 against the same station
42	153	FAZAL RABI	GMS BAGH	GHSS DHODIAL	Promoted & posted as Senolor TT B-16 against Mr.Shafiq ur Rehman S.#91
43	154	AHMAD ALI	GMS BAI PAYEEN	GHS CHINAR KOT	Promoted & posted as Senolor TT B-16 against Mr.S.Falque H.Shah S.#92
44	155	MUHAMMAD ARSHAD	GHS CHANSAIR	GHS CHANSAIR	Promoted & posted as Senolor TT B-16 against the same station
45	156	GHULAM MUJTABA	GMS BATTANG	GHSS G.H.ULLAH	Promoted & posted as Senolor TT B-16 against Mr.Ibraheem S.#93
46	157	SHABEER AHMAD	GHS BAI BOHAL	GHS BAI BOHAL	Promoted & posted as Senolor TT B-16 against the same station
47	158	MAZHAR ALI SHAH	GHSS PAIRAN	GHSS PAIRAN	Promoted & posted as Senolor TT B-16 against the same station
48	159	MUNSIF	GMS JHANGAR	GHS KHAKI	Promoted & posted as Senolor TT B-16 against Mr.Abdur Rehman S.#94
49	160	ABDUL RASHID	GMS TIMBRI BATTANG	GHS SUNI	Promoted & posted as Senolor TT B-16 against Mr.Abdul Hameed S.#95
50	161	S NAZIR HUSSAIN SHAH	GMS BALAG PAYEEN	GHS SHAHELIA	Promoted & posted as Senolor TT B-16 against Mr.M.Islam S.# 96
51	163	AZIZ AHMED	GMS SOWAN	GHS HASRA	Promoted & posted as Senolor TT B-16 against Mr.Falaz Muhd S.# 97
52	165	MUHAMMA YASIR	GMS CHANJA	GHS BAIDRA	Promoted & posted as Senolor TT B-16 against Mr.M.Zubair S.# 98
53	166	RASHEED AHMED	GMS NALLAH JABBAR	GHSS JALIBORI	Promoted & posted as Senolor TT B-16 against Mr.Shah Abdul Hafeez S.# 99
54	167	MUHAMMAD SHABIR	GMS KHAN	GHS BATTAL	Promoted & posted as Senolor TT B-16 against Mr.Mall ur Rehman S.#100
55	168	M.SHAFIQ	GHS BANGHIAN	GHS BANGHIAN	Promoted & posted as Senolor TT B-16 against the same station
56	171	MANZOOR UL HAQ	GHS KHAIT SARASH	GHS KHAIT SARASH	Promoted & posted as Senolor TT B-16 against the same station
57	172	MUHAMMAD RAFIQ	GMS MILKOT	GHS AHL	Promoted & posted as Senolor TT B-16 against Mr.M.Miskeen S.# 78
58	173	SAEED UR REHMAN	GMS JAGORI	GHS KOTLI BALA	Promoted & posted as Senolor TT B-16 against Mr.Ghulam Sarwar S.# 102
59	174	BADR MUNIR	GMS BASUND	GHS LITHAKRAL	Promoted & posted as Senolor TT B-16 against Mr.Ubaid ur Rehman S.# 103

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ATTEST

PROMOTION ORDER TT (M) B-16

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60	175	MUHAMMAD ANWAR	GMS CHULANDRIAN	GHS OCHI	Promoted & posted as Senolor TT B-16 against Mr. Rizwan ulahi S.# 104
61	176	HUSNUL WAHAB	GHS CHATTAR PLAIN	GHS CHATTAR PLAIN	Promoted & posted as Senolor TT B-16 against the same station
62	178	ABDUL NASIR	GHS ICHRIAN	GHS ICHRIAN	Promoted & posted as Senolor TT B-16 against the same station
63	179	ANSEE SU REHMAN	GHS CHAMIAL	GHS CHAMIAL	Promoted & posted as Senolor TT B-16 against the same station
64	180	M.IBRAR	GHS BANDI SHUNGLI	GHS BANDI SHUNGLI	Promoted & posted as Senolor TT B-16 against the same station
65	181	MUHAMMAD RASHID	GMS MATHIAL	GHS NO.3 MANSEHRA	Promoted & posted as Senolor TT B-16 against Mr. Akhter H. Shah S.# 105
66	182	ATTA UR REHMAN	GMS NANOHA KALAN	GHS KHAWARI	Promoted & posted as Senolor TT B-16 against Mr. Faisal Shah S.# 106
67	183	M ISMAIL	GHS M M POLE	GHS M M POLE	Promoted & posted as Senolor TT B-16 against the same station
68	184	DASHARAT KHAN	GHS ATTERSISHA	GHS ATTERSISHA	Promoted & posted as Senolor TT B-16 against the same station
69	185	MUHAMMAD SIDDIQUE	GHS BATTAL	GHS BATTAL	Promoted & posted as Senolor TT B-16 against the same station
70	186	EHSAN ULLAH	GMS KULHARY BAFIA	GHS SHERPUR	Promoted & posted as Senolor TT B-16 against Mr. Masood ur Rehman S.# 107
71	187	INAYAT UR REHMAN	GMS MORE B KHUKD	GHS KHUSHALA	Promoted & posted as Senolor TT B-16 against Mr. M. Yousaf S.# 108
72	189	SHAFIQ UR REHMAN	GMS KANDAR	GHS TRAPPI	Promoted & posted as Senolor TT B-16 against Mr. Haidar Zaman S.# 109
73	190	MOHD NAZIR	GMS LAMMI	GHS JALGALI	Promoted & posted as Senolor TT B-16 against Mr. Sher Zaman S.# 110
74	191	ATTA UR REHMAN	GMS KALWAL	GHS GALI BADRAL	Promoted & posted as Senolor TT B-16 against Mr. Abdur Rasheed S.# 111

CONSEQUENTIAL TRANSFER/ADJUSTMENT OF TCR'S

S.#	Name of Teacher	Present station	Place of posting	Remarks/ Consequential Adjustment
75	M.KHUSHAL	GHS Balakot	GMS Balakot	Vice S.# 5
76	M.RAFAQAT	GHS SHANKIARI	GMS TANDA	Vice S.# 11
77	ABDUL SALAM	GHS No.2 Mans:	GHSS No.1 Mans:	Vice S.# 13
78	MOHD MISKEEN	GHS Ahi	GMS Hilkot	Vice S.# 57
79	MUHAMMAD PERVAZ	GHS Bajna	GMS TUMBAH	Vice S.# 16
80	SHABEER AHMAD	GHS CHANDOOR	GMS Chakli Pansial	Vice S.# 20
81	ATTA UL HAQ	GHS Garwal	Gms Tarharri	Vice S.# 21
82	NASEER AHMAD	GHS Bissian	GMS Darra Shohal	Vice S.# 24
83	M ARIF	GHS Moorat Mera	Gms Thathl Khurd	Vice S.# 25
84	M.YOUSAF	GHS Trangri Bala	GMS Gul Bagh	Vice S.# 27
85	S.ZAMAN SHAH	GHSS Shergaith	GMS Bai Bajna	Vice S.# 28
86	MUHAMMAD SHARIF	GHS Nawazabad	GMS Sathan Gali	Vice S.# 30
87	ABDUL HAKIM	GHSS Baffa	GHS Ichrian	Vice S.# 31
88	QASIM ULLAH	GHS Kollka	GMS Trawara	Vice S.# 32
89	JAFAR SHAH	GHS Laharkot	GMS KOTKAY	Vice S.# 36
90	QARI ABDUR RAUF	GHS Talhatta	GMS Nokot	Vice S.# 37
91	SHAFIQUE UR REHMAN	GHSS Dhodial	GMS Bagh	Vice S.# 42
92	S RAFIQUE HUSSAIN SHAH	GHS Chlnarkot	GMS Bal Payeen	Vice S.# 43
93	MOHD IBRAHIM	GHSS G.I. Ullah	GMS Baltang	Vice S.# 45

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ATTESTED

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PROMOTION ORDER TT (M) B-16

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94	ABDUR REHMAN	GHS Khawaj	GMS Jehangar	Vice S.# 48
95	ABDUL HAMEED	GHS SUM	GMS Timbrl Battang	Vice S.# 49
96	MUHAMMAD ISLAM	GHS Shahela	GMS BALHAG PAYEEN	Vice S.# 50
97	FAIZ AHMAD	GHS Hassa	GMS Sowan	Vice S.# 51
98	M.ZUBAIR	GHS Bahra	GMS Chanja	Vice S.# 52
99	SHAH ABDUL HAFEEZ	GHSS JABBORI	GMS Nallah Jabbar	Vice S.# 53
100	MUTI UR REHMAN	GHSS Baktal	GMS Khun	Vice S.# 54
101	MISKEEN	GHS Malookia	GMS Khakoo	Vice S.# 14
102	GHULAM SARWAR	GHS Koll Bala	GMS Jagori	Vice S.# 58
103	URBAID UR REHMAN	GHSS Lagan Thakral	GMS Bussand	Vice S.# 59
104	RIZWAN ULLAH	GHS Oghi	GMS Chulandran	Vice S.# 60
105	AKHTER HUSSAIN SHAH	GHS No.3	GMS Mathial	Vice S.# 65
106	S.FAISAL SHAH	GHS Khawaj	GMS Nahnah Kalan	Vice S.# 66
107	MASOOD UR REHMAN	GHSS Shergur	GMS Kulharay	Vice S.# 70
108	M.YOUSAF	GHS Khushala	GMS M.Balfa Khurd	Vice S.# 71
109	HAIDER ZAMAN	GHSS Trippal	GMS Kandar	Vice S.# 72
110	MOHD SHER ZAMAN	GHS JALGALI	GMS Lammi	Vice S.# 73
111	ABOUL RASHID	GHSS Gali Badral	GMS Kalwal	Vice S.# 74

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 maybe 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 preceded 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. They will give an order 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.
7. They should join their post with in 15 days of this notification in case of failure to join their post with in 15 days of the issuance of this notification their promotion will be expire automatically & no subsequent appeals will be entertained
8. Checking & verification of all the documents shall be ensure by the DDO concerned.
9. Necessary entries to this effect should be recorded in their S/Book.
10. No TADA is allowed fro joining his duty.

Sd/-
(UMER KHAN KUNDI)
DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

Endst: No. 1925-32 /Estt: (M) Prom: Senior TT/Dated Mansehra the 27-02- /2013.

- Copy forwarded for information and necessary action to the:-
1. PS to Secretary to Government of Khyber Pakhtunkhwa E&SE Department Peshawar.
 2. Director E&SE Department Khyber Pakhtunkhwa Peshawar.
 3. All Principal /HM School concerned.
 4. District Accounts Officer Mansehra
 5. Dy:District Officer Finance & Planning Mansehra.
 6. B&AO local office
 7. Officials concerned.

DY: DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

ATTESTED

27/02/2013
 Umer Khan Kund
 District Education Officer
 (Male) Mansehra

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To,

The District Account Officer
Mansehra.

Subject:- FIXATION IN BPS 16 AS S TT

Sir,

It is stated that I have been promoted in BPS 16 as S TT vide DEO (M) Mansehra office Endstt: No. 1925-32 in compliance with director E&S Edu: KPK peshawar Endstt: No. 3272-78/F.No. 1 Prom: Senior TT B/16 21.02.2013.

It is requested that my fixation in BPS 16 may please be accorded.

Thanks.

Name, Muhammed Javed

Designation S. T.T

Returned:

The teacher is holding the post of "Dax" and not the cadre T.T. on regular basis. Proper order competent authority regarding his appointment as TT / change of cadre from "Dax" to "T.T." may please be provided.

ATTESTED

To,

THE DIRECTOR EDUCATION
(Elementary & Secondary Education),
KPK Peshawar.

Subject: APPEAL FOR PROMOTION ORDER TT(M) BPS-16.

Sir,

Respectfully stated that the undersigned is promoted reference Endst. No.1925-32/Estt(M) from Senior TT dated Mansehra the 27.02.2013 but still waiting for the post of TT BPS-16. The facts etc. are like a follows:

1. I was appointed as a Qari reference Office order No.83 dated 03.11.1986. (*Orders attached herewith*).
2. I was adjusted reference Endst. No.821-25/AE dated 17.01.1996 w.e.f. 03.12.1995. (*Order attached herewith*).
3. I was promoted at T.T post reference No. SO(B&A)/1-18/Elementary & Secondary Education 2012 issued under this office Endst. No.4991-5145 dated ~~27-02-2012~~ 27-02-2012 ✓
4. Again I am promoted as a Senior T.T reference Endst. No.1925-32/Estt (M) Senior T.T/dated Mansehra the 27.02.2013.

Moreover I am working at T.T post since 03.12.1995 and also promoted rapidly on T.T post.

Now I am promoted in BPS-16 and my qualification is like as follows:-

ATTESTED

- (B)
(25)
1. I had passed my C.T exam in 1990.
 2. I had passed my Shahadat-ul-Khasa and Dars-e-Nizami in 1984.
 3. I had passed my B.A exam in 1st Division in 2008.
 4. I have passed by B.Ed. exam in 2012-13.
 5. I had passed by M.A (Islamiyat) Exam in 2012.
Other certificates ^{call} should be provided if needed.

My pay in BPS-16 is still not paid due to the objection raised by D.A.O Mansehra. (Objections photocopy is attached herewith), which is entirely against the rules and justice.


Kindly arrange to fix my pay in BPS-16, which is in my right, if not arrange.

I will contact to the Honourable concerned court for the above cited subject.

Thanks,

Dated ³¹⁻⁸ 2013

Yours obediently.


MUHAMMAD JAVED
T.T BPS-16
Govt. High School Bissian,

COPY TO:

1. Honourable Secretary Education, KPK Peshawar.
2. D.O (M), Mansehra.
3. Head Master Government High School Bissian.
4. D.A.O District Mansehra.

ATTESTED

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

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PESHAWAR.

S.A.No. _____/2013

Muhammad Javed Petitioner/ Appellant

Versus

Govt. of KPK through Secretary Education,

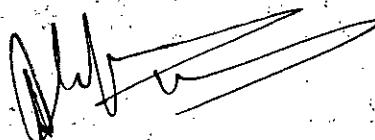
KPK, Civil Secretariat, Peshawar and others..... Respondents

INDEX

S.No.	Description of documents.	Annexure	Pages.
1.	Memo of appeal with affidavit.		1-4
2.	Appointment order		5
3.	Copy of adjustment order		6
4.	Copy of notification/ promotion order		7-10
5.	Copy of application and objection		11
6.	Copy of appeal.		12-13
7.	Copy of service book		14-22
8.	Wakalatnama.		23

Appellant

Through



Abdul Ghaffar Khan

Advocate High Court

Peshawar.

Cell: 0300-5956376

ATTESTED

Dated: 05.12.2013

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

S.A.No. _____/2013

Muhammad Javed T.T. GHS, Bissian
Tehsil Balakot, District Mansehra..... Petitioner/ Appellant

Versus

- 1) Govt. of Khyber Pakhtunkhwa through Secretary Education, KPK, Civil Secretariat, Peshawar.
- 2) Director of Education, KPK at Dabgari Garden, Peshawar.
- 3) District Education Officer (Male) Mansehra at Dub No.1 Mansehra.
- 4) District Accounts Officer Kacheri Road, Mansehra.
- 5) Accountant General, KPK, Peshawar..... Respondents

APPEAL U/S 4 OF THE SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER OF RESPONDENTS NO.2 AND 4, WHEREBY THE RELEASE/FIXATION OF PAY IN BPS-16 AS S.T.T. WAS REFUSED TO THE PETITIONER/APPELLANT BY RESPONDENTS NO.2 & 4.

P-11

Prayer:

On acceptance of this appeal, the respondents may kindly be directed to fix the pay of the petitioner/ appellant in BPS-16 as S.T.T. and release it to the petitioner with arrears, if any, to the petitioner.

ATTESTED

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Respectfully Sheweth;

- 1) That the appellant was appointed against the post of "Qari" vide order No.17077-17119 dated 03.11.1986 of respondent No.3. (Appointment order is annexed).
- 2) That the appellant obtained leave w.e.f. 03.12.93 to 02.12.95 vide leave sanctioned DEO (M) Mansehra Endorsement No.9074-76 dated 19.04.1994. (Copy of service book is annexed).
- 3) That on return from leave, the appellant was adjusted against the vacant post of T.T. w.e.f. 03.12.1995 by respondent No.3 vide order No.821-25 dated 17.01.1996. (Copy of adjustment order is annexed).
- 4) That later on the scale of the appellant was upgraded from B-9 to B-15 w.e.f. 01.07.2012.
- 5) That the petitioner/ appellant was promoted to post of Senior T.T. by respondent No.2 vide his order No.1925-32 dated 27.02.2013 at S.No.24 on the basis of regular promotion along with other similar T.Ts. (Copy of promotion order is annexed).
- 6) That the case of the petitioner/ appellant was sent for fixation of pay in B.P.S. 16, but astonishingly the same was refused by respondent No.4 by putting an objection on the fixation of pay in BPS-16, without any plausible reason. (Copy of application and objection is annexed).
- 7) That the petitioner made an appeal to respondent No.2 in this regard, but the respondent No.2 turned a deaf ear to the request of the petitioner/ appellant in the form of "inaction" on the part of the respondent No.2. (Copy of appeal is annexed).
- 8) That having no other efficacious remedy available, the petitioner/ appellant now approaches this hon'ble Tribunal for the redressal of his grievances, inter alia on the following grounds:

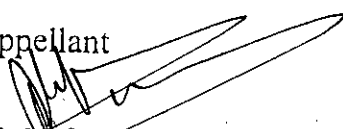
ATTESTED

GROUNDS:

- A) That the said act i.e. refusal to fix pay of the petitioner/ appellant in BPS-16 by the respondents is against law, facts and material on record, hence untenable in the eyes of law and liable to be set aside.
- B) That non-fixation of the pay of the appellant/ petitioner in BPS-16 amounts to injustice as no such objection has been raised earlier by the respondents while fixing his pay in BPS-9 and BPS-15 and making necessary entries in his service book as T.T.
- C) That the petitioner/ appellant has been promoted to BPS-16 on regular basis according to the existing policy.
- D) That the batch mates of the petitioner/ appellant have been promoted to S.T.T. and they are enjoying their benefits/ salaries, while the petitioner/ appellant has been refused fixation of pay in B-16 which is a clear malafide and is against the norms of natural justice and without any lawful reason.
- E) That other grounds will be raised at the time of arguments before this hon'ble Tribunal.

It is, therefore, requested that on acceptance of this appeal, the respondents may kindly be directed to fix the pay of the petitioner/ appellant in BPS-16 and pay it with arrears, if any, to the appellant.

Any other relief which this hon'ble Tribunal deems appropriate in the circumstances of the case and not specifically asked for may kindly also be granted.

Appellant
Through 
Abdul Ghaffar Khan
Advocate High Court
Peshawar.
Cell: 0300-5956376

ATTESTED

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR.

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S.A.No. _____/2013

Muhammad Javed Petitioner/ Appellant

Versus

Govt. of KPK through Secretary Education,

KPK, Civil Secretariat, Peshawar and others..... Respondents

AFFIDAVIT

I, Muhammad Javed T.T. GHS, Bissian Tehsil Balakot, District Manshra do hereby affirm and declare on oath that the contents of the accompanying Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

Identified by



(ADVOCATE)

Deponent

ATTESTED

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DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION
KHYBER PAKHTUNKHWA

NOTIFICATION

Muhammad Javed Qari promotions as Senior TT (B16) at Sr.No.25 vide Notification Endst: No.3272-78 dated 21.02.2012 is hereby reverted to Qari post with effect from the date of his promotion as he is basically Qari teacher.

He will be adjusted against his original post of Qari and ^{all the} ~~amounts~~ ^{amounts} as he enjoyed against the post of Senior TT (16) will recovered from him.

DIRECTOR
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

Endst: No. 3460-66 /F No.385/Vol: I/TT/AA/Qari (M) Gen: Dated Peshawar the 27/5 2014.

Copy forwarded for information and necessary action to the:-

1. District Education Officer (M) Mansehra w/r to his letter No.4076 dated 04.04.2014 with the direction to adjust the teacher concerned against Qari post and the amount may be recovered from him.
2. District Accounts Officer Mansehra.
3. Teacher concerned.
4. P/A to Director E&SE, Khyber Pakhtunkhwa, Peshawar.
5. Master File.

[Signature]
Deputy Director (Es.b.)
Elementary & Secondary Edu:
Khyber Pakhtunkhwa Peshawar

23/5/14

ATTESTED

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MANSEHRA

NOTIFICATION

In pursuance to the notification issued from Director (E&SE) Peshawar vide Endst No 3660-64/F.No 385 Vol- I/ TT/AT/Qari (M) Gen. dated Peshawar 27/05/2014 Mr. Muhammad Javeed Qari Promotion as Senior TT (B-16) vide 3272-78 dated 21/02/2012 is hereby adjusted at vacant Qari post at GHSS Jared.

Note:

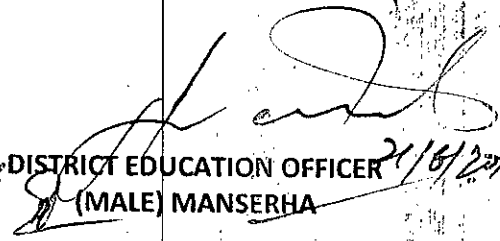
- 1. Principal GHSS Jared with the Direction vide Endst No. 660-64/F.No 385 Vol- I/ TT/AT/Qari (M) Gen Dated 27/05/2014 to tabulate the period as STT post for the recovery and revised entry should be made in his service book (Copy Attached)
- 2. Charge report should be submitted to all concerned.
- 3. No TA/DA is allowed.

-sd/-
**DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA**

Endst: No 7615-19 Dated 23/6/2014

Copy for information to the:

- 1. Director E&SE Khyber Pakhtunkhwa Peshawar to his memo No 3660-64/F.No 385/Vol-I/ TT/AT/Qari (M) Gen: Dated 27/05/2014
- 2. District Account Office Mansehra.
- 3. Principal/H.M GHS Bissian/GHSS Jared Mansehra.
- 4. Teachers Concerned.
- 5. Office order file.


Dy. DISTRICT EDUCATION OFFICER 21/6/2014
(MALE) MANSEHRA

ATTESTED

34

The Secretary
Elementary & Secondary Education,
Khyber Pakhtunkhwa,
Peshawar.

Subject: **DEPARTMENTAL APPEAL.**

Respected Sir,

1. That the appellant was appointed against the post of "Qari" vide order No. 17077-17119 dated 03/11/1986 of the District Education Officer, Mansehra.
2. That the appellant obtained leave w.e.f. 03/12/1993 to 02/12/1995 vide leave sanctioned EDO (M) Mansehra Endorsement No. 9074-76 dated 19/04/1994.
3. That on return from leave, the appellant was adjusted against the vacant post of T.T. w.e.f. 03/12/1995 by respondent No. 3 vide order No. 821-25 dated 17/01/1996.
4. That later on the scale of the appellant was promoted from B-9 to B-15 w.e.f. 01/07/2012.
5. That the appellant was again promoted to post of Senior T.T. by Director Education vide his order NO. 1925-32 dated 27/02/2013 on the basis of regular promotion along with other similar T.T.s.

ATTESTED

6. That the case of the appellant was sent for fixation of pay in B.P.S-16, but astonishingly the same was refused on account of want of notification of change of cadre.
7. That the appellant made an appeal to Director of Education for fixation of pay in BPS-16, but of no avail.
8. That the appellant approached to the Service Tribunal Khyber Pakhtunkhwa in this regard and while the proceedings before the Service Tribunal were pending adjudication, that in the meanwhile through a notification issued by the Director Education, the petitioner was reverted from BPS-16 to the post of Qari, BPS-07 vide order No. 3460-64 dated 27/05/2014, without any fault on the part of the appellant; hence the present appeal.

GROUND:

- A. That the said notification of the Director Education (E&S) is against the law, facts, material on record, unconstitutional, illegal, unlawful and without lawful authority, hence untenable in the eyes of law and liable to be set aside.
- B. That the reversion of the appellant, amounts to penalty without any fault, on the part of the appellant which is against the norms of natural justice as the appellant has been condemned unheard.

ATTESTED

- C. That the department himself has adjusted the appellant against T.T. Post and the appellant has worked in the cadre of T.T. for more then 19 years.
- D. That the seniority of the appellant in the cadre of T.T. has never been objected ~~t~~ by any one during his simultaneous promotion four times in the present cadre, even the department has never objected while promoting the appellant from BPS-7 to BPS-9, 12, 15 and lastly to BPS-16.
- E. That the reversion of the appellant is against the rulings of the superior Courts, hence the ^{same} ~~is~~ is not sustainable.

It is, therefore, requested that on acceptance of this appeal, the said notification No. 3460-64 dated 27/05/2014 of the Director Education may kindly be set aside and the appellant may kindly be allowed to work smoothly in BPS-16 as S.T.T with all back benefits.

Any other relief which deems fit and appropriate may also kindly be awarded to the appellant.

Yours sincerely



Muhammad Javed

S.T.T.

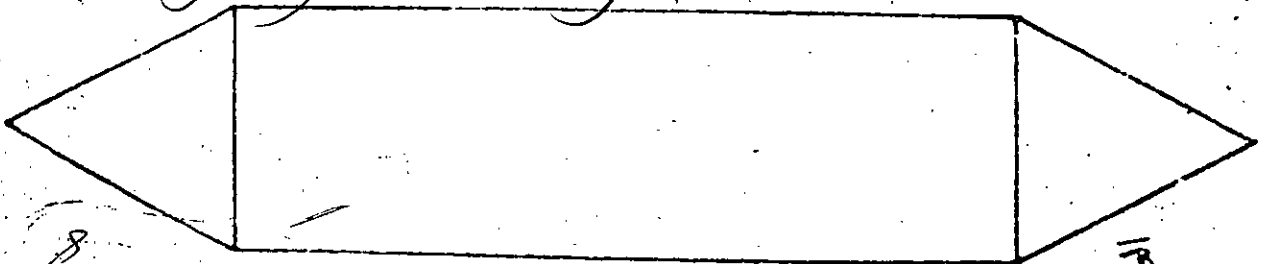
G.H.S, Bissian Tehsil Balakot
District Manshera.

Dated: 24/06/2014

ATTESTED

بعد الت

صبر کجا صبر و صبر کجا صبر



محمد حاوید بنام حکومت صبر کجا

Service Appeal

مقدمہ

دعویٰ

جزم

باعث تخریب آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب وہی دیکل کارروائی متعلقہ آن مقام لیسٹاور کے لئے عبد الخضر خان اپنی وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوت کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا نیز دیکل صاحب کو کرنے راضی نامہ و تقررات و فیصلہ برحسب دہی جواب دہی اور اقبال دعویٰ اور بصورت دیگر کرنے اجراء اور دوسوی چیک درپہ اور عرضی دعویٰ اور درخواست ہر تم کی تصدیق نہ راہیں پر دستہ کر لے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا بگری کیفر یا اپیل کی برآمدگی اور سوغی نیز دیکل کرنے اپیل نگہانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کارروائی کے واسطے اور دیکل یا اختیار قانونی کو اپنے ہمراہ یا اپنی جہتے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پداختہ منظور قبول ہوگا و دوران مقدمہ میں جو خرچہ دہر جائزہ اتوائے مقدمہ کے سب سے ہوگا۔ اگلے مستحق دیکل صاحب موصوت ہوں گے۔ نیز تقابلاً و خرچہ کی ذمہ داری قبول کرنے کا بھی اختیار ہوگا۔ اگر کوئی تاخیر پیشی مقام دورہ یہ ہو یا حد سے باہر ہو تو دیکل صاحب یا بندہ ہوں گے۔ کہ پیروی مذکور کریں۔ ابتدائات نامہ لکھنا یا کہ سند رہے۔

2014

اکتوبر

11

المترجم

دکرا نش

کے لئے منظور ہے۔

لیسٹاور

محمد حاوید و ولہ محمد لیسٹاور صاحبان
 GHS
 جنرل منسلک فاضلہ (منسلک)

13581-1317034-3

BEFORE THE HONOURABLE SERVICE TRIBUNAL
KPK PESHAWAR CAMP COURT ABBOTTABAD.

Appeal No, 1245/2014

Muhammad Javaid Qari Govt: High School Bissian Mansehra.....APPELLANT.

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education KPK Peshawar.
2. Director Elementary & Secondary Education KPK Peshawar.
3. District Education Officer (Male) Mansehra.
4. Accountant General KPK Peshawar.RESPONDENTS.

Written reply on behalf of the Respondents No 1, 2, & 3.

Respectfully Sheweth:

PREIMINARY OBJECTIONS:

1. That the appellant has got no cause of action/locus standi to file the instant appeal.
2. That the appeal is not maintainable in its present form and also the present circumstances of the issue.
3. That the appellant has not come to the court with cleans hands.
4. The instant appeal is bad for non-joinder/mis-joinder of necessary parties.
5. That the appellant is estopped by his own conduct to file the instant appeal.
5. That the appeal is groundless, and based on malafide.
6. That the appeal is based on false and malafide attention hence deserves dismissed.
7. That the respondents have not violated any law/policy/rules.
8. That the instant appeal is filed just to pressurize the respondents.

9. That the appellant has concealed the material facts from this honorable Tribunal. Hence not entitled for any relief and appeal is liable to be dismissed.

10. That the appeal is badly time barred.

FACTUAL OBJECTIONS

1. Para No. 1 pertains to records.
2. Para No. 2 is pertains to record.
3. Para No. 3 is correct up to the extent that the appellant was adjusted as stop gap arrangement on his own Pay & grade against the vacant post of T.T on his return from leave as there was no vacant post of Qari at that time in the the District. The appellant cadre was not changed.**(Ordered annexed as annexure A)**
4. Para No.4 is incorrect, infect the appellant was not entitled of upgradation against TT post, the appellant was fully aware of the fact that he is on Qari post but he pretend him TT and was wrongly upgraded from B-09 to B-15.
5. Para No. 5 is incorrect infect the appellant was wrongly promoted as Senior TT because he is basically Qari as both are different cadres, so the respondent No.3 pointed out this error to respondent No.2 vide letter No.4076 dated 4-4-2014, and requested to Director Elementary & Secy:Education KPK Peshawar to withdraw the promotion order of appellant from Notification vide Director E&SE KPK Peshawar under Endst: No, 3272-78 dated 21-2-2012 Muhammad Javed Qari as Senior TT at S.No.25.**(The same is annexed as annexure B)**
6. Para No. 6 is incorrect. Hence denied, infect the appellant approached to District Accounts Office Mansehra for fixation of Pay in BPS, 16 as S.TT, however District Accounts Officer made an objection that "the appellant is holding the post of Qari not TT so his pay cannot be fixed in BPS-16 as S.TT without proper order from the competent authority regarding cadre change from Qari to TT". **(Annexure C)**. However detailed reply can be gotten from respondent No.4.
7. Para No.7 is incorrect. Hence denied. The appeal was not liable to be treated in accordance with the rules and was thus set aside.
8. Para No 8 is correct to the extent that in response to the request of respondent No.3 as already discussed in Para No.5 the promotion order of appellant as S.T.T BPS,16 at S.No,25 vide notification Endst:No,3272-78 dated 21-2-2012 reverted to Qari Post by respondent No,2 vide notification Endst:No,3460-64/ Fno 385 /vol:I /TT/ AA/ Qari (M) Gen:dated 27-5-2014 adjusting him on his basic original Post.**(Annexure D)**
9. The appellant has no right to make a Departmental representation because he is fully aware that with drawl order by respondent No.2 is in accordance with the rules, policy and law as it was not the right of appellant to get promotion against wrong adjustment of TT post.
10. In correct. The appellant has no right to approach this Honourable Service Tribunal because the reversion order of appellant is in accordance with the law, Rules and policy furthermore the respondent Department has also some other ground.

GROUNDS:-


- A. Para No. A is incorrect; the Notification No 3460-64 dated 27-5-2014 by respondent No.2 is according to the law, facts rules and policy and maintainable in the eyes of law.
- B. Para No. B is in correct the appellatant was fully aware of his service status that he was appointed as Qari and not TT, his adjustment against TT post was just only to stop the gape and his promotion against this post WAS not his legal right as per rules and law, so there is no injustice with him on behalf of the respondents, the appellatant trying to get benefit cheating the Department as well as wasting the precious time of Honourable Court and trying to conceal the facts. Hence not entitled for any relief.
- C. Para No. C is not admitted as it has been already discussed in preceding Paras that his original post was Qari and his adjustment against TT Post was due to the non availability of Qari post and all his promotion was wrongly made and it was also an intentional fault of appellatant who never tried to bring this Departmental mistake before the competent authorities that he is being wrongly promoted, being a Government Servant it was his duty to point out this mistake before the Department.
- D. Para No. D is incorrect, every case has own facts and circumstances.
- E. Detailed discussion has already been done in preceding paras; the appellatant is trying to seek benefit of mistake which is against the law, rules and policies.
- F. That the respondents also seek permission of this Honourable Court to raise other grounds at the time of arguments.

PRAYER:-

In the view of above facts, it is therefore graciously prayed that the instant appeal may very kindly be dismissed with cost.

Respondent No. 1 
Secretary E&SE KPK Peshawar.

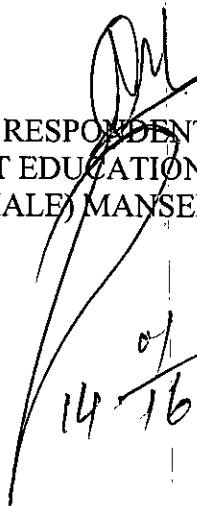
Respondent No. 2 
Director E&SE KPK Peshawar

Respondent No 3 
District Education Officer (Male) Mansehra.

14/16

AFFIDAVIT

I do hereby solemnly affirm and declare that the content of the reply of the comments in the above appeal No.1245/2014 Muhammad Javed versus Education Department are true to the best of my conviction and belief and I have concealed nothing.


RESPONDENT
DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

14th / 16

A

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) SECONDARY MANSEHRA.

ADJUSTMENT.

On return from leave Mr. Mehmasa Javed, Qari is hereby adjusted against the vacant post of T.T on his own pay and grade at GMS, Suwan w.e.f 3-12-1995 in the interest of public service.

NOTE:-

1. Charge report should be submitted to all concerned.

Enclosure of 1/2/1996

(FAZALUR-RAHIM)
DISTRICT EDUCATION OFFICER
(MALE) SECONDARY MANSEHRA.

Enast: No. 821-25 /AL-21 Dated Mansehra the 17-1 /1996.

Copy to the:-

1. District Accounts Officer, Mansehra.
2. Headmaster Govt; Middle School, Suwan.
3. ADEO (Accounts) Local Office.
4. Official concerned.

DISTRICT EDUCATION OFFICER
(MALE) SECONDARY MANSEHRA.

“ ~~A~~ ” B

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MANSEHRA

No. 4076 /
Dated 04/4/2014.

To,

The Director,
Elementary & Secondary Education KPK
Peshawar.

Subject: - **CANCELATION OF PROMOTION IN R/O MR, MUHAMMAD
JAVED QARI/T.T. PROMOTED VIDE NOTIFICATION
ENDST; NO.3272-78 DATED.21-02-2012.**

Memo:-

The undersigned would like to invite your kind attention on the subject
Cited above and to state:-

1. That Mr. Muhammad Javed was appointed against the post of "Qari" vide order No.17077-17119 dated 3-11-1986.
2. That he obtained leave w.e.f. 03-12-1993 to 02-12-1995 vide leave sanctioned DEO (M) Mansehra Endst: No. 9074-76 dated.19-04-1994.
3. That on return from leave, he was adjusted against the vacant post of T.T. on 03-12-1995 as stop gap arrangement, as there was no vacant post of Qari available at that time.
4. That since 03-12-1995 he was never reversed to his original post of Qari and he remained on TT post up till now.
5. During the promotion from T.T. to S.T.T. in 2012, his name was wrongly included in the D.P.C. and he was promoted from T.T. BPS-15 to S.T.T. (M) BPS 16 vide Notification issued by the Directorate of Elementary & Secondary Education under Endstt; No. 3272-78 Dated. 21-02-2012. -

As Mr. Muhammad Javed was adjusted against the post of T.T. on stop gap arrangement, and his name was wrongly included in the D.P.C, hence it is requested that his promotion from T.T to S.T.T. may kindly be cancelled, so as this office will be able to adjust him on his original post of Qari.

Note: The Above Named Teacher has also approached to the Honorable Service Tribunal Peshawar (Copy Attached)


DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA.

17	97	Khalid Mahmood	GHS Janda	15/02/1973	Do
18	100	Mohd Idrees	GHS Phulra	01/04/1967	Do
	102	Fakhar Ul Islam	GHS Jaba	01/04/1976	Do

22	107	Q Abdul Malik	GHS Janda		
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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

35

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	235
1/3 share of Senior TT Posts	78
Share of promotion 100 %	78
Promoted to the post of Senior TT B-16.	77

S#	S#	Name	Name Of School	Date of Birth	Remarks
1	15	Abdur Rasheed	GHS Mohar	28/09/1960	Services placed at the disposal of DEO (M) Mansehra for further posting.
2	17	M.Yomas	GHS L/Nawab	02/03/1957	----Do-----
3	26	M.Amwer	GHS Kajla	03/04/1959	----Do-----
4	32	Qari Bashir Ahmad	GHS Bandi Parow	03/04/1960	----Do-----
5	33	Muhammad Iqbal Nadeem	GMS Balakot	01/01/1966	----Do-----
6	41	Ghulam Din	GHS Hari Mera	28/05/1960	----Do-----
7	58	Abdul Rasheed	GHS Datta	01/05/1966	----Do-----
8	63	Habib Ur Rehman	GHS Dilbori	05/12/1963	----Do-----
9	71	Muhammad Riaz Ul Haq	GHSS No.1 Mansehra	01/04/1971	----Do-----
10	72	Maqbool Ur Rehman	GHS Shamdara	05/06/1960	----Do-----
11	82	Atta Ul Haq	GMS Bela Sach	15/04/1965	----Do-----
12	86	S Dildar Shah	GMS Tumbuh	07/05/1970	----Do-----
13	87	Muhammad Irfan	GHS Nambal	01/02/1971	----Do-----
14	90	Anjad Saeed	GHSS No.1 Mansehra	05/06/1971	----Do-----
15	94	Muhammad Shafique	GMS Khakoo	02/03/1964	----Do-----
16	95	Q.M Idrees	GHS New Darband	24/06/1965	----Do-----
17	97	Khalid Mahmood	GMS Tanda	21/04/1968	----Do-----
18	100	Mohd Idrees	GHS Phutra	15/02/1973	----Do-----
19	102	Fakhar Ul Islam	GHS Jaba	01/04/1967	----Do-----
20	103	Saraj Ud Din	GHS Balakot	01/04/1976	----Do-----
21	106	Muhammad Tahir	GMS Chakli Pansial	05/05/1971	----Do-----
22	107	Q Abdul Malik	GMS Tarharri	04/01/1964	----Do-----

23	113	S. Afzal Hussain Shah	GHSS Pairan	20/02/1961	----Do-----
24	114	Q Waheed Uz Zaman	GHS Mohandri	01/01/1975	----Do-----
25	115	Muhammad Javed	GMS Dara Shohal	31/12/1963	----Do-----
26	120	Abdullah	GMS Thathi Khurd	13/04/1974	----Do-----
27	126	Mohd Bashir	GHSS G H Ullah	24/12/1967	----Do-----
28	129	Aziz Ur Rehman	GMS Guli Bagh	20/03/1978	----Do-----
29	132	Abdul Wahid	GMS Bai Bajna	05/02/1973	----Do-----
30	134	Abdur Rasid	GHS Chitta Batta	25/04/1972	----Do-----
31	138	Muhammad Rafiq	GMS Sathan Gali	01/01/1977	----Do-----
32	139	Q Abdul Mameer	GHS Mangloor	19/05/1966	----Do-----
33	140	Rasheed Ahmad	GHS Ichrian	17/01/1973	----Do-----
34	141	Muhammad Rafiq	GMS Tarwara	06/07/1972	----Do-----
35	142	Hafiz Muhammad Siddique	GHSS Perhina	12/12/1970	----Do-----
36	145	M. Zaman	GHS Dadar	03/02/1971	----Do-----
37	146	Fayyaz Muhammad	GHSS Karori	08/02/1973	----Do-----
38	147	Mohd Niaz	GMS Kotkay	15/03/1976	----Do-----
39	148	Inhamullah	GMS Nokot	12/04/1969	----Do-----
40	149	Abdul Rasheed	GHS Hussainian	01/04/1970	----Do-----
41	150	Nazir Ahmad	GHS Ramkot	10/12/1970	----Do-----
42	151	M Anwar	GHS Gandhian	05/11/1971	----Do-----
43	152	Aziz Ur Rehman	GHS Timber Khola	15/10/1972	----Do-----
44	153	Fazal Rabi	GMS Bagh	12/11/1972	----Do-----
45	154	Ahmad Ali	GMS Bai Payeen	17/02/1973	----Do-----
46	155	Muhammad Arshad	GHS Chansair	31/05/1973	----Do-----
47	156	Ghulam Mujtaba	GMS Battang	05/12/1973	----Do-----
48	157	Shabeer Ahmad	GHS Bai Bohal	24/01/1974	----Do-----
49	158	Mazhar Ali Shah	GHSS Pairan	15/05/1974	----Do-----
50	159	Munsif	GMS Jhangar	21/10/1974	----Do-----
51	160	Abdul Rashid	GMS Timbri Battang	01/12/1974	----Do-----
52	161	S Nazir Hussain Shah	GMS Balag Payeen	06/11/1976	----Do-----
53	163	Aziz Ahmed	GMS Sowran	20/01/1977	----Do-----
54	165	Muhamma Yasir	GMS Chanja	15/03/1978	----Do-----
55	166	Rasheed Ahmed	GMS Nallah Jabbar	22/09/1978	----Do-----
56	167	Muhammad Shabir	GMS Khan	26/04/1979	----Do-----
57	168	M. Shafiq	GHS Baughian	03/12/1979	----Do-----
58	171	Manzoor Ul Haq	GHS Khait Sarash	23/01/1982	----Do-----
59	172	Muhammad Rafiq	GMS Hilkot	13/04/1984	----Do-----
60	173	Saeed Ur Rehman	GMS Jagori	15/02/1975	----Do-----
61	174	Badr Munir	GMS Basund	01/04/1978	----Do-----
62	175	Muhammad Anwar	GMS Chulandrian	25/12/1978	----Do-----
63	176	Husnul Wahab	GHS Chatter Plain	02/02/1972	----Do-----
64	177	Husan Ul Wahab	GMS Khakoo	02/02/1972	----Do-----
65	178	Abdul Nasir	GHS Ichrian	02/06/1972	----Do-----
66	179	Ansee Su Rehman	GHS Chamial	20/04/1978	----Do-----
67	180	M. Ibrar	GHS Bandi Shungli	19/10/1978	----Do-----

68	181	Muhammad Rashid	GMS Mathial	04/01/1979	----Do-----
69	182	Atta Ur Rehman	GMS Nanoha Kalan	11/04/1979	----Do-----
70	183	M Ismail	GHS M M Pole	01/02/1980	----Do-----
71	184	Basharat Khan	GHS Attershisha	05/01/1974	----Do-----
72	185	Muhammad Siddique	GHSS Battal	12/04/1980	----Do-----
73	186	Ehsan Ullah	GMS Kulhary Baffa	10/08/1975	----Do-----
74	187	Inayat Ur Rehman	GMS More B Khurd	25/02/1977	----Do-----
75	189	Shajiq Ur Rehman	GMS Kandari	21/02/1978	----Do-----
76	190	Mohd Nazir	GMS Lammi	20/11/1979	----Do-----
77	191	Atta Ur Rehman	GMS Kalwal	08/08/1980	----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 preceded 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.

3272-78

Endst: No. / File No.1/Promotion Senior TT B-16: Dated Peshawar the 21/02/2012.

Copy forwarded for information and necessary action to the: -

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. District Education Officers (M) Mansehra.
3. District Accounts Officer Mansehra.
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 (Es/ab)

Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

C

OFFICE OF THE HEAD MASTER G.H.S. DISSIAN D.D.O CODE 6252

To,

The District Account Officer
Mausehra.

Subject: PROMOTION IN BPS 16 AS S.T.T.

Sir,

It is stated that I have been promoted in BPS 16 as S.T.T. vide DEO (M) Mausehra
Office Enclt: No.1925-32 in compliance with director E&S Edu:KPK peshawar
Enclt: No.3272-78/R.No.1 Prom:Senior TT 3/16 21.02.2013.

It is requested that my fixation in BPS 16 my pleased be accorded.

Thanks.

Name: Muhammad Javed

Designation: S.T.T.

Returned:

The teacher is holding the post
of "Dai" ^{and} ~~not~~ the cadre of T.T.
Proper order competent authority regarding
his appointment as T.T. / change of cadre
from "Dai" to "T.T." may please
be provided.

D

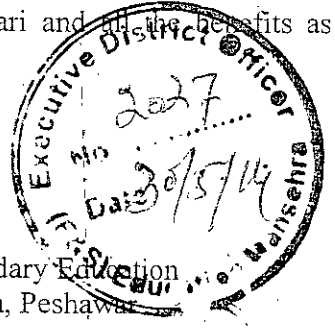
Sufat
for Jumbato
a.c.d.
7/29/15/2014
DRO

DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION
KHYBER PAKHTUNKHWA

NOTIFICATION

Muhammad Javed Qari promotions as Senior TT (B16) at Sr.No.25 vide Notification Endst: No.3272-78 dated 21.02.2012 is hereby reverted to Qari post with effect from the date of his promotion as he is basically Qari teacher.

He will be adjusted against his original post of Qari and all the benefits as he enjoyed against the post of Senior TT (16) will recovered from him.

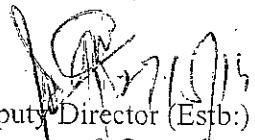


DIRECTOR
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

Endst: No. 3460-64 /F No.385/Vol:I/TT/AA/Qari (M) Gen: Dated Peshawar the 27/5 2014.

Copy forwarded for information and necessary action to the:-

1. District Education Officer (M) Mansehra w/r to his letter N o.4076 dated 04.04.2014 with the direction to adjust the teacher concerned against Qari post and the amount may be recovered from him.
2. District Accounts Officer Mansehra.
3. Teacher concerned.
4. P/A to Director E&SE, Khyber Pakhtunkhwa, Peshawar.
5. Master File.


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

27/5/14

Before the Khyber Pakhtunkhwa Service Tribunal Peshawar

Appeal No.1245/2014.

Muhammad Javeed.....Petitioner.

V/S

Government of Khyber Pakhtunkhwa through
Secretary Education, Peshawar and others.....Respondents.

(Para wise reply on behalf of respondent No. 4)

Preliminary Objections.

- 1) That the appellant has no cause of action.
- 2) That the appellant has no locus standi.
- 3) That the appeal in hand is not maintainable.
- 4) That the appellant has not come to this court with clean hands.
- 5) That DAO Manshera is the necessary party in the instant case, which has not been made as respondent by the appellant.

Respectfully Sheweth:-

- 1:- Proved by record hence no comments.
- 2:- Proved by record hence no comments.
- 3:- That respondent No.3 has no power to change to cadre of any Civil Servant without proper sanction of competent authority.
- 4:- Incorrect.
- 5). Relates to respondent No.2 hence no comments.
- 6:- That DAO Manshera is bound to follow the rules and instructions issued by Provincial Government of Khyber Pakhtunkhwa from time to time. And has rightly been returned with observation of the appellant for fixation of pay. That the cadre of any Civil Servant cannot be changed without the proper sanction of the competent authority.

7:- Relates to respondent No.2 hence no comments.

8:- Correct. That the action taken by respondent No.2 is correct and under the rules.

9:- Relates to respondent No.1 hence no comments.

10:- That the cadre from Qari to T.T above the promotion to B-16 of the appellant is against the rules and illegal. Hence the appellant is liable to be reverted to his original post and the appeal may be dismissed.

GROUND:-

A:- That the Notification of respondent No.2 is lawful, legal and under the rules.

B:- That the reversion of the appellant is under the rules.


C:- Relates to respondent No. 1 to 3 hence, no comments.

D:- As mentioned in Para B above.

E:- As mentioned in Para 3 above.

F:- No Comments.

Keeping in view the above mentioned facts, it is therefore, humbly prayed that the appeal in hand having no merits may be dismissed with cost.


ACCOUNTANT GENERAL
KHYBER PAKHTUNKHWA

BEFORE THE HONBLE SERVICE TRIBUNAL KPK.

MUHAMMAD JAVED Petitioner...

Vs

GOVT. OF KPK & OTHERS..... Respondents...

Subject:- Application for allowing the petitioner to deposit the security fee in Service Appeal No. 7 2015.

Respectfully sheweth:

1) That the above titled case is pending subjudice before this Hon'ble Tribunal in which the date is fixed for 8-6-2015.

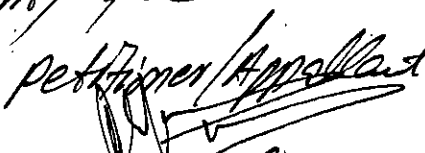
2) That on previous date i.e 26-2-2015 this Hon'ble Tribunal was kind enough to admit the case for full hearing along with order for depositing security fee.

3) That inadvertently the petr/appellant was unable to deposit the security fee within time.

4) That non depositing of security fee within due time was neither intentional nor deliberate but due to human error.

It is therefore most humbly prayed that on acceptance of the instant application, the petr/appellant may kindly be allowed to deposit the security fee

Dt 24/4/15

through  Counsel.

①

BEFORE THE HON'BLE SERVICE TRIBUNAL
KPK PESHAWAR

Muhammad Javed Vs Govt of KPK & others

Subject: Rejoinder on behalf of Petitioner/Appellant.

As to Preliminary objections:

All the preliminary objections from 1 to 10 are incorrect, hence denied.

ON FACTS:

- 1) The respondents are bound to maintain correct official ^{record} and to consult it.
- 2) As replied above.
- 3) The adjustment of the appellant has been admitted while the rest of the para is incorrect. Posts were available but on the vacant post of the appellant, the respondents had appointed their some blue eyed persons which they do not want to remove for ulterior motives. Moreover the change of line from Qari to T.T ^{in the form of adjustment} was made by the order of the Respondent No. 3 who is a competent authority which adjustment ^{was} meant as implied consent of the competent authority, and which has taken legal.

(2)

effect and valuable rights have been accrued to the petr./Appellant, which cannot be recalled.

4) Incorrect. Record was available before the Respondents even then they willfully promoted and upgraded the petr./appellant on the post of T.T and even don't recorded any objection on his upgradation nor on his seniority. The respondent cannot take the benefit in the vail of wrong order.

5) Incorrect. All the situation were in the knowledge of the respondents and they deliberately did the same by promoting the petr./appellant to ~~different~~^{various} scales in different times on ~~different~~^{various} seniority lists which orders they cannot rescinded to the disadvantage of the petr./appellant. The ^{request/} notification for the withdrawal of promotion orders of the appellant by respondents is illegal and unlawful, having no legal effect in the light of the judgments of Superior Courts.

6) Incorrect. In fact it was the act of the account officer which was illegal. Entries in service book during various times were made, ^{*} pay was regularly paid on monthly basis, but the said accounts officer never

(3)

pointed out the same in the past. Moreover order of adjustment/change of line was made by competent authority which was in field and in presence of the said order, he was not right to raise such objection.

7) Incorrect. The appeal was liable to be treated in accordance with the law and dictations of superior courts.

8) ^{In} para No 8 ^{of reply} the respondents have admitted the stance of the petitioner. Moreover the notification mentioned in the said para is illegal and unlawful.

9) Incorrect. The notification ^{of respondents} was challenged by the petr./appellant as it is illegal and without having any legal/lawful footing. Hence liable to be struck down through a judicial order.

10) Incorrect, as discussed in the above paras.

Grounds: The grounds taken by the petr./appellant in the main appeal may kindly be treated as ground of this rejoinder.

It is therefore humbly prayed that the prayer made by the petr./appellant

(4)

in the main appeal may kindly be acceded to and the reply of the respondents may graciously be struck down as being based on malafide.

Dt. 15 ⁸/₀₁₆

Through ^{Shri} pet/ appellent
Counsel.
Deponent Present in Person



15/08/2016

FINANCE DEPARTMENT
(REGULATION WING)

Dated Peshawar the 25th Jan 2008.

NOTIFICATION:-

No.FD/SO(FR)10-22/2007, In supersession of this Department's letter No.SO(FR)10-22(B)/2005 dated 1-10-2007 and in pursuance of the decisions of the meeting held under the Chairmanship of Secretary Establishment on 2-1-2008, the Competent authority is pleased to allow Up-Gradation for the incumbents of the posts as per details given below w.e.f. 1-10-2007:-

S.No	Existing Designation and Pay Scale	Qualification	Up-Graded Scale.
1.	Primary School Teacher (PST) (BPS-07)	BA/BSc and are trained teachers.	BPS-09 (in one time only).
2.	Primary School Teacher (PST) with requisite Experience Re-Named as Head Teacher/Head Mistress of Primary Schools (BPS-07)	Having 10 years Service	BPS-12 (one time only)
3.	CT (BPS-09)	BA/BSc and are trained teachers	BPS-15 (one time only)
4.	SETs (BPS-16)	With at least ten years service. Up-gradation to the post shall be made through DPC as per laid down procedure.	BPS-17.
✓ 5.	Qari/Qaria (BPS-07)	Hafti Quran with SSC	BPS-12

Sd/-----

SECRETARY TO GOVT: OF NWFP.
FINANCE DEPARTMENT

Endst No. & Date even

Copy of the above is forwarded for information and necessary action to the:-

1-10. All the concerned Offices in NWFP

Sd/---

(NAIB KHAN)

SECTION OFFICER (FR)

OFFICE OF THE DIRECTOR SCHOOLS & LITERACY N.W.F.P, PESHAWAR.

Endst No. 3267-317 / P.No.95 Demands of Pry; Teachers Dated 29/1/2008.

Copy of the above is forwarded to:-

- 1-24. All the Executive District Officers (S&L) IN NWFP.
- 25-48. All the District/Agency Accounts Officers in NWFP
49. President All Primary Teachers Association NWFP.
50. P/A to Director Local Office.

KHYBER PAKHTUNKWA SERVICE TRIBUNAL, PESHAWAR

No. 158 /ST Dated 24 / 1 / 2017


To

The Director (E&SE),
Government of Khyber Pakhtunkhwa,
Peshawar.

Subject: - JUDGMENT

I am directed to forward herewith a certified copy of Judgement dated 18.01.2017 passed by this Tribunal on the above subject for strict compliance.

Encl: As above


REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.

①

BEFORE THE HON'BLE SERVICE TRIBUNAL
KPK PESHAWAR

Muhammad Javed Vs Govt of KPK & others

Subject: Rejoinder on behalf of Petitioner/Appellant.

As to Preliminary objections:

All the preliminary objections from 1 to 10 are incorrect, hence denied.

ON FACTS:

- 1) The respondents are bound to maintain correct official ^{record} and to consult it.
- 2) As replied above.
- 3) The adjustment of the appellant has been admitted while the rest of the para is incorrect. Posts were available but on the vacant post of the appellant, the respondents had appointed their some blue eyed persons, which they do not want to remove for ulterior motives. Moreover the change of line from Qari to T.T. ^{in the form of adjustment} was made by the order of the Respondent No. 3 who is a competent authority which adjustment ^{was} meant as implied consent of the competent authority, and which has taken legal

(2)

effect and valuable rights have been accrued to the petr./Appellant, which cannot be recalled.

4) Incorrect. Record was available before the Respondents even then they willfully promoted and upgraded the petr./appellant on the post of T.T and even don't recorded any objection on his upgradation nor on his seniority. The respondent cannot take the benefit in the veil of wrong order.

5) Incorrect. All the situation were in the knowledge of the respondents and they deliberately did the same by promoting the petr./appellant to ^{various} ~~different~~ scales in different times on ^{various} ~~different~~ seniority lists which orders they cannot rescinded to the disadvantage of the petr./appellant. The ^{request/} notification for the withdrawal of promotion orders of the appellant by respondents is illegal and unlawful, having no legal effect in the light of the judgments of Superior Courts.

6) Incorrect. In fact it was the act of the account officer which was illegal. Entries in service book during various times were made, * pay was regularly paid on monthly basis, but the said accounts officer never

(3)

pointed out the same in the past. Moreover order of adjustment/change of line was made by competent authority which was in field and in presence of the said order, he was not right to raise such objection.

7) Incorrect. The appeal was liable to be treated in accordance with the law and dictions of superior courts.

8) In ^{reply} para no 8 the respondents have admitted the stance of the petitioner. Moreover the notification mentioned in the said para is illegal and unlawful.

9) Incorrect. The notification ^{of respondents} was challenged by the petr./appellant as it is illegal and without having any legal/lawful footing. Hence liable to be struck down through a judicial order.

10) Incorrect, as discussed in the above paras.

Grounds: The grounds taken by the petr./appellant in the main appeal may kindly be treated as ground of this rejoinder.

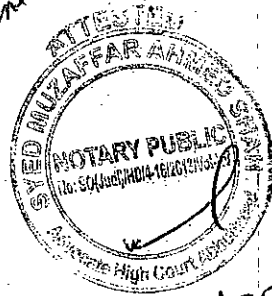
It is therefore humbly prayed that the prayer made by the petr./appellant

(4)

in the main appeal may kindly be acceded to and the reply of the respondents may graciously be struck down as being based on malafide.

DT. 15 $\frac{8}{2/6}$

Shri
per/oppalent
through counsel.
Deponent Present in Person



15/08/2016

Before the Khyber Pakhtunkhwa Service Tribunal Peshawar

Appeal No.1245/2014.

Muhammad Javeed.....Petitioner.

V/S

Government of Khyber Pakhtunkhwa through
Secretary Education, Peshawar and others.....Respondents.

(Para wise reply on behalf of respondent No. 4)

Preliminary Objections.

- 1) That the appellant has no cause of action.
- 2) That the appellant has no locus standi.
- 3) That the appeal in hand is not maintainable.
- 4) That the appellant has not come to this court with clean hands.
- 5) That DAO Manshera is the necessary party in the instant case, which has not been made as respondent by the appellant.

Respectfully Sheweth:-

- 1:- Proved by record hence no comments.
- 2:- Proved by record hence no comments.
- 3:- That respondent No.3 has no power to change to cadre of any Civil Servant without proper sanction of competent authority.
- 4:- Incorrect.
- 5). Relates to respondent No.2 hence no comments.
- 6:- That DAO Manshera is bound to follow the rules and instructions issued by Provincial Government of Khyber Pakhtunkhwa from time to time. And has rightly been returned with observation of the appellant for fixation of pay. That the cadre of any Civil Servant cannot be changed without the proper sanction of the competent authority.

7:- Relates to respondent No.2 hence no comments.

8:- Correct. That the action taken by respondent No.2 is correct and under the rules.

9:- Relates to respondent No.1 hence no comments.

10:- That the cadre from Qari to T.T above the promotion to B-16 of the appellant is against the rules and illegal. Hence the appellant is liable to be reverted to his original post and the appeal may be dismissed.

GROUND:-

A:- That the Notification of respondent No.2 is lawful, legal and under the rules.

B:- That the reversion of the appellant is under the rules.


C:- Relates to respondent No. 1 to 3 hence, no comments.

D:- As mentioned in Para B above.

E:- As mentioned in Para 3 above.

F:- No Comments.

Keeping in view the above mentioned facts, it is therefore, humbly prayed that the appeal in hand having no merits may be dismissed with cost.


ACCOUNTANT GENERAL
KHYBER PAKHTUNKHWA

BEFORE THE HONOURABLE SERVICE TRIBUNAL
KPK PESHAWAR CAMP COURT ABBOTTABAD.

Appeal No, 1245/2014

Muhammad Javaid Qari Govt: High School Bissian Mansehra.....APPELLANT.

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education KPK Peshawar.
2. Director Elementary & Secondary Education KPK Peshawar.
3. District Education Officer (Male) Mansehra.
4. Accountant General KPK Peshawar.RESPONDENTS.

Written reply on behalf of the Respondents No 1, 2, & 3.

Respectfully Sheweth:

PREIMINARY OBJECTIONS:

1. That the appellant has got no cause of action/locus standi to file the instant appeal.
2. That the appeal is not maintainable in its present form and also the present circumstances of the issue.
3. That the appellant has not come to the court with cleans hands.
4. The instant appeal is bad for non-joinder/mis-joinder of necessary parties.
5. That the appellant is estopped by his own conduct to file the instant appeal.
5. That the appeal is groundless, and based on malafide.
6. That the appeal is based on false and malafide attention hence deserves dismissed.
7. That the respondents have not violated any law/policy/rules.
8. That the instant appeal is filed just to pressurize the respondents.

9. That the appellant has concealed the material facts from this honorable Tribunal. Hence not entitled for any relief and appeal is liable to be dismissed.

10. That the appeal is badly time barred.

FACTUAL OBJECTIONS

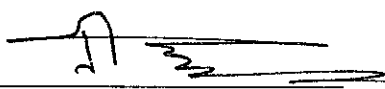
1. Para No. 1 pertains to records.
2. Para No. 2 is pertains to record.
3. Para No. 3 is correct up to the extent that the appellant was adjusted as stop gap arrangement on his own Pay & grade against the vacant post of T.T on his return from leave as there was no vacant post of Qari at that time in the the District. The appellant cadre was not changed.**(Ordered annexed as annexure A)**
4. Para No.4 is incorrect, infect the appellant was not entitled of upgradation against TT post, the appellant was fully aware of the fact that he is on Qari post but he pretend him TT and was wrongly upgraded from B-09 to B-15.
5. Para No. 5 is incorrect infect the appellant was wrongly promoted as Senior TT because he is basically Qari as both are different cadres, so the respondent No.3 pointed out this error to respondent No.2 vide letter No:4076 dated 4-4-2014, and requested to Director Elementary & Secy:Education KPK Peshawar to withdraw the promotion order of appellant from Notification vide Director E&SE KPK Peshawar under Endst: No, 3272-78 dated 21-2-2012 Muhammad Javed Qari as Senior TT at S.No.25.**(The same is annexed as annexure B)**
6. Para No. 6 is incorrect. Hence denied, infect the appellant approached to District Accounts Office Mansehra for fixation of Pay in BPS, 16 as STT, however District Accounts Officer made an objection that "the appellant is holding the post of Qari not TT so his pay cannot be fixed in BPS-16 as STT without proper order from the competent authority regarding cadre change from Qari to TT". **(Annexure C)**. However detailed reply can be gotten from respondent No.4.
7. Para No.7 is incorrect. Hence denied. The appeal was not liable to be treated in accordance with the rules and was thus set aside.
8. Para No 8 is correct to the extent that in response to the request of respondent No.3 as already discussed in Para No.5 the promotion order of appellant as S.T.T BPS,16 at S.No,25 vide notification Endst:No,3272-78 dated 21-2-2012 reverted to Qari Post by respondent No,2 vide notification Endst:No,3460-64/ Fno 385 /vol:I /TT/ AA/ Qari (M) Gen:dated 27-5-2014 adjusting him on his basic original Post.**(Annexure D)**
9. The appellant has no right to make a Departmental representation because he is fully aware that with drawl order by respondent No.2 is in accordance with the rules, policy and law as it was not the right of appellant to get promotion against wrong adjustment of TT post.
10. In correct. The appellant has no right to approach this Honourable Service Tribunal because the reversion order of appellant is in accordance with the law, Rules and policy furthermore the respondent Department has also some other ground.

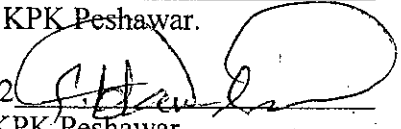
GROUND:-


- A. Para No. A is incorrect; the Notification No 3460-64 dated 27-5-2014 by respondent No.2 is according to the law, facts rules and policy and maintainable in the eyes of law.
- B. Para No. B is in correct the appellant was fully aware of his service status that he was appointed as Qari and not TT, his adjustment against TT post was just only to stop the gape and his promotion against this post WAs not his legal right as per rules and law, so there is no injustice with him on behalf of the respondents, the appellant trying to get benefit cheating the Department as well as wasting the precious time of Honourable Court and trying to conceal the facts. Hence not entitled for any relief.
- C. Para No. C is not admitted as it has been already discussed in preceding Paras that his original post was Qari and his adjustment against TT Post was due to the non availability of Qari post and all his promotion was wrongly made and it was also an intentional fault of appellant who never tried to bring this Departmental mistake before the competent authorities that he is being wrongly promoted, being a Government Servant it was his duty to point out this mistake before the Department.
- D. Para No. D is incorrect, every case has own facts and circumstances.
- E. Detailed discussion has already been done in preceding paras; the appellant is trying to seek benefit of mistake which is against the law, rules and policies.
- F. That the respondents also seek permission of this Honourable Court to raise other grounds at the time of arguments.

PRAYER:-

In the view of above facts, it is therefore graciously prayed that the instant appeal may very kindly be dismissed with cost.

Respondent No. 1 
Secretary E&SE KPK Peshawar.

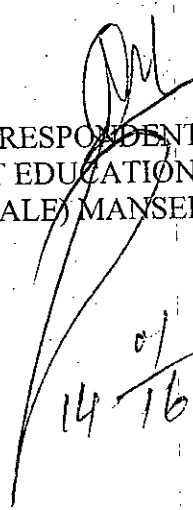
Respondent No. 2 
Director E&SE KPK Peshawar

Respondent No 3 
District Education Officer (Male) Mansehra.

14/01/16

AFFIDAVIT

I do hereby solemnly affirm and declare that the content of the reply of the comments in the above appeal No.1245/2014 Muhammad Javed versus Education Department are true to the best of my conviction and belief and I have concealed nothing.


RESPONDENT
DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

14/16

A

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) SECONDARY MANSHERA.

ADJUSTMENT.

On return from leave Mr. Mohammad Javed, Qari is hereby adjusted against the vacant post of T.T on his own pay and grade at GMS, Suwan w.e.f 3-12-1995 in the interest of public service.

NOTE:-

1. Charge report should be submitted to all concerned.

(FAZALUR-RAHIM)
DISTRICT EDUCATION OFFICER
(MALE) SECONDARY MANSHERA.

Enst: No. 821-25 /AE-37 dated Manshera the 17-1 /1996.

Copy to the:-

1. District Accounts Officer Manshera.
2. Headmaster Govt; Middle School Suwan.
3. ADEO (Accounts) Local Office.
4. Official concerned.

DISTRICT EDUCATION OFFICER
(MALE) SECONDARY MANSHERA.

“ ~~A~~ ” B

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MANSEHRA

No. 4076/1
Dated 4/4/2014.

To,

The Director,
Elementary & Secondary Education KPK
Peshawar.

Subject: - CANCELATION OF PROMOTION IN R/O MR. MUHAMMAD JAVED QARI/T.T. PROMOTED VIDE NOTIFICATION ENDST;NO.3272-78 DATED.21-02-2012.

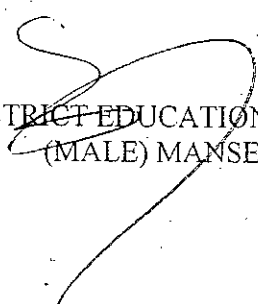
Memo:-

The undersigned would like to invite your kind attention on the subject Cited above and to state;-

1. That Mr. Muhammad Javed was appointed against the post of "Qari" vide order No.17077-17119 dated 3-11-1986.
2. That he obtained leave w.e.f. 03-12-1993 to 02-12-1995 vide leave sanctioned DEO (M) Mansehra Endst: No. 9074-76 dated.19-04-1994.
3. That on return from leave, he was adjusted against the vacant post of T.T. on 03-12-1995 as stop gap arrangement, as there was no vacant post of Qari available at that time.
4. That since 03-12-1995 he was never reversed to his original post of Qari and he remained on TT post up till now.
5. During the promotion from T.T. to S.T.T. in 2012, his name was wrongly included in the D.P.C. and he was promoted from T.T. BPS-15 to S.T.T. (M) BPS 16 vide Notification issued by the Directorate of Elementary & Secondary Education under Endst; No. 3272-78 Dated. 21-02-2012.

As Mr. Muhammad Javed was adjusted against the post of T.T. on stop gap arrangement, and his name was wrongly included in the D.P.C, hence it is requested that his promotion from T.T to S.T.T. may kindly be cancelled, so as this office will be able to adjust him on his original post of Qari.

Note: The Above Named Teacher has also approached to the Honorable Service Tribunal Peshawar (Copy Attached)


DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA.

17	97	Khalid Mehmood	GHS Phulra	15/02/1973	Do
18	101	Mohd Idrees	GHS Jaba	01/04/1967	Do
	102	Fakhar Ul Islam	GHS Phulra	01/04/1976	Do
22	107	Q Abdul Malik	GHS Phulra		



B

35

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

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	235
1/3 share of Senior TT Posts	78
Share of promotion 100 %	78
Promoted to the post of Senior TT B-16.	77

S#	S#	Name	Name Of School	Date of Birth	Remarks
1	15	Abdur Rasheed	GHS Mohar	28/09/1960	Services placed at the disposal of DEO (M) Mansehra for further posting.
2	17	M.Younas	GHS L/Nawab	02/03/1957	----Do-----
3	26	M.Amver	GHS Kajla	03/04/1959	----Do-----
4	32	Qari Bashir Ahmad	GHS Bandi Parow	03/04/1960	----Do-----
5	33	Muhammad Iqbal Nadeem	GMS Balakot	01/01/1966	----Do-----
6	41	Ghulam Din	GHS Hari Mera	28/05/1960	----Do-----
7	58	Abdul Rasheed	GHS Datta	01/05/1966	----Do-----
8	63	Habib Ur Rehman	GHS Dilbori	05/12/1963	----Do-----
9	71	Muhammad Riaz Ul Haq	GHSS No.1 Mansehra	01/04/1971	----Do-----
10	72	Maqbool Ur Rehman	GHS Shamdara	05/06/1960	----Do-----
11	82	Atta Ul Haq	GMS Bela Sach	15/04/1965	----Do-----
12	86	S Dildar Shah	GMS Tumbah	07/05/1970	----Do-----
13	87	Muhammad Irfan	GHS Nambal	01/02/1971	----Do-----
14	90	Anjad Saeed	GHSS No.1 Mansehra	05/06/1971	----Do-----
15	94	Muhammad Shafique	GMS Khakoo	02/03/1964	----Do-----
16	95	Q.M Idrees	GHS New Darband	24/06/1965	----Do-----
17	97	Khalid Mehmood	GMS Tandar	21/04/1968	----Do-----
18	100	Mohd Idrees	GHS Phutra	15/02/1973	----Do-----
19	102	Fakhar Ul Islam	GHS Jaba	01/04/1967	----Do-----
20	103	Saraj Ud Din	GHS Balakot	01/04/1976	----Do-----
21	106	Muhammad Tahir	GMS Chakli Pansial	05/05/1971	----Do-----
22	107	Q Abdul Malik	GMS Tarharri	04/01/1964	----Do-----

23	113	S. Afzal Hussain Shah	GHSS Pairan	20/02/1961	----Do----
24	114	Q Waheed Uz Zaman	GHS Mohandri	01/01/1975	----Do----
25	115	Muhammad Javed	GMS Dara Shohal	31/12/1963	----Do----
26	120	Abdullah	GMS Thathi Kinurd	13/04/1974	----Do----
27	120	Mohd Bashir	GHSS G.H. Dllah	24/12/1967	----Do----
28	130	Aziz Ur Rehman	GMS Guli Bagh	20/03/1978	----Do----
29	132	Abdul Wahid	GMS Bai Bajna	05/02/1973	----Do----
30	134	Abdur Rasid	GHS Chitta Batta	25/04/1972	----Do----
31	138	Muhammad Raifq	GMS Sathan Gali	01/01/1977	----Do----
32	139	Q Abdul Muneer	GHS Mangloor	19/05/1966	----Do----
33	140	Rasheed Ahmad	GHS Ichrian	17/01/1973	----Do----
34	141	Muhammad Rafiq	GMS Tarwara	06/07/1972	----Do----
35	142	Hafiz Muhammad Siddique	GHSS Perhina	12/12/1970	----Do----
36	145	M. Zaman	GHS Dadar	03/02/1971	----Do----
37	146	Fayjaz Muhammad	GHSS Karori	08/02/1973	----Do----
38	147	Mohd Niaz	GMS Kotkay	15/03/1976	----Do----
39	148	Inhamullah	GMS Nokot	12/04/1969	----Do----
40	149	Abdul Rasheed	GHS Hussainian	01/04/1970	----Do----
41	150	Nazir Ahmad	GHS Ramkot	10/12/1970	----Do----
42	151	M Anwar	GHS Gandhian	05/11/1971	----Do----
43	152	Aziz Ur Rehman	GHS Timber Khola	15/10/1972	----Do----
44	153	Fazal Rabi	GMS Bagh	12/11/1972	----Do----
45	154	Ahmad Ali	GMS Bai Payeen	17/02/1973	----Do----
46	155	Muhammad Arshad	GHS Chansair	31/05/1973	----Do----
47	156	Ghulam Mujtaba	GMS Battang	05/12/1973	----Do----
48	157	Shabeer Ahmad	GHS Bai Bohal	24/01/1974	----Do----
49	158	Mazhar Ali Shah	GHSS Pairan	15/05/1974	----Do----
50	159	Munsif	GMS Jhangar	21/10/1974	----Do----
51	160	Abdul Rashid	GMS Timbri Battang	01/12/1974	----Do----
52	161	S Nazir Hussain Shah	GMS Balag Payeen	06/11/1976	----Do----
53	163	Aziz Ahmed	GMS Sowar	20/01/1977	----Do----
54	165	Muhamma Yasir	GMS Chanja	15/03/1978	----Do----
55	166	Rasheed Ahmed	GMS Nallah Jabbar	22/09/1978	----Do----
56	167	Muhammad Shabir	GMS Khan	26/04/1979	----Do----
57	168	M. Shafiq	GHS Banghian	03/12/1979	----Do----
58	171	Manzoor Ul Haq	GHS Khait Sarash	23/01/1982	----Do----
59	172	Muhammad Rafiq	GMS Hilkot	13/04/1984	----Do----
60	173	Saeed Ur Rehman	GMS Jagori	15/02/1975	----Do----
61	174	Badr Munir	GMS Basund	01/04/1978	----Do----
62	175	Muhammad Anwar	GMS Chulandrian	25/12/1978	----Do----
63	176	Husnul Wahab	GHS Chattar Plain	02/02/1972	----Do----
64	177	Husan Ul Wahab	GMS Khakoo	02/02/1972	----Do----
65	178	Abdul Nasir	GHS Ichrian	02/06/1972	----Do----
66	179	Ansee Su Rehman	GHS Chamial	20/04/1978	----Do----
67	180	M. Ibrar	GHS Bandi Shungli	19/10/1978	----Do----

68	181	Muhammad Rashid	GMS Mathial	04/01/1979	----Do-----
69	182	Atta Ur Rehman	GMS Nanoha Kulan	11/04/1979	----Do-----
70	183	M Ismail	GHS M M.Pole	01/02/1980	----Do-----
71	184	Basharat Khan	GHS Attershisha	05/01/1974	----Do-----
72	185	Muhammad Siddique	GHSS Battal	12/04/1980	----Do-----
73	186	Ehsan Ullah	GMS Kulhary Baffa	10/08/1975	----Do-----
74	187	Inayat Ur Rehman	GMS More B Khurd	25/02/1977	----Do-----
75	189	Shafiq Ur Rehman	GMS Kandar	21/02/1978	----Do-----
76	190	Mohd Nazir	GMS Lammi	20/11/1979	----Do-----
77	191	Atta Ur Rehman	GMS Kalwal	08/08/1980	----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 preceded 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.

3972-78

Endst: No. / File No.1/Promotion Senior TT B-16: Dated Peshawar the 21/02/2012.

Copy forwarded for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. District Education Officers (M) Manshehra.
3. District Accounts Officer Manshehra.
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

C

OFFICE OF THE HEAD MASTER G.H.S BISSIAN D.D.O CODE 6252

To,

The District Account Officer
Manshra.

Subject: PROMOTION IN BPS 16 AS S.T.T

Sir,

It is stated that I have been promoted in BPS 16 as S.T.T vide DFO (M) Manshra
Office Order No. 1925-32 in compliance with director E&S Edu: KPIC Peshawar
Order No. 3272-78/P.No.1 Prom: Senior TT 5/16 21.02.2013.

I request that my fixation in BPS 16 may please be accorded.

Thank..

Name: Muhammad Taved

Designation: S.T.T.

Returned:

The teacher is holding the post
of "Rai" ^{and} not the cadre of T.T.
Proper order ^{is} required regarding
his appointment as T.T. / change of cadre
from "Rai" to "T.T." may please
be provided.

D

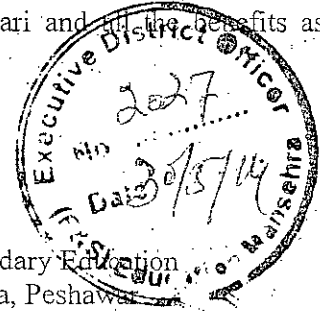
Suppl. II
for promotion
a.c.d.
29/5/2014

DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION
KHYBER PAKHTUNKHWA

NOTIFICATION

Muhammad Javed Qari promotions as Senior TT (B16) at Sr.No.25 vide Notification Endst: No.3272-78 dated 21.02.2012 is hereby reverted to Qari post with effect from the date of his promotion as he is basically Qari teacher.

He will be adjusted against his original post of Qari and all the benefits as he enjoyed against the post of Senior TT (16) will recovered from him.



DIRECTOR
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

Endst: No. 3460-64 /F No.385/Vol:I/TT/AA/Qari (M) Gen: Dated Peshawar the 27/5 2014.

Copy forwarded for information and necessary action to the:-

1. District Education Officer (M) Mansehra w/r to his letter N o.4076 dated 04.04.2014 with the direction to adjust the teacher concerned against Qari post and the amount may be recovered from him.
2. District Accounts Officer Mansehra.
3. Teacher concerned.
4. P/A to Director E&SE, Khyber Pakhtunkhwa, Peshawar.
5. Master File.

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

29/5/14