

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
AT CAMP COURT SWAT.

Service Appeal No. 921/2022

Date of institution 17.06.2022

Nisar Ahmad S/O Hazrat Bilal R/O Saidu Sharif, Tehsil Babozai, District Swat.

VERSUS

The Secretary of (E&SE) Department, Khyber Pakhtunkhwa, Peshawar and two others.

ORDER
03.10.2022

Appellant alongwith his counsel present.

Learned counsel for the appellant stated at the bar that he wants to withdraw the instant appeal. In this respect, written endorsement of learned counsel for the appellant obtained at margin of order sheet.

In view of the above, the appeal in hand stands dismissed as withdrawn. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
03.10.2022



(SALAH-UD-DIN)
MEMBER (JUDICIAL)
CAMP COURT SWAT




I want with draw appeal No, 921/2022.
3/10/2022

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 921/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	17/06/2022	<p>The appeal of Mr. Nisar Ahmad presented today by Mr. Umar Khitab Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	13.7.22	<p>This case is entrusted to touring Single Bench at Swat for preliminary hearing to be put there on <u>01.08.22</u>. Notices be issued to appellant and his counsel for the date fixed.</p> <p style="text-align: right;"> CHAIRMAN</p>
1- 8. 22		<p><i>Due to barrister vacation the case is adjourned to 3-10-22 for the same.</i></p> <p style="text-align: right;"></p>

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

CHECK LIST

1.	Case titled	<i>Nisar Ahmad Vs The Secretary of (E&SE) etc</i>	YES	NO
2.	Case is duly signed		Yes	
3.	The law under which the case is preferred has been mentioned		Yes	
4.	Approved file cover is used		Yes	
5.	Affidavit is duly attested and appended		Yes	
6.	Case and the annexure are properly paged and numbered according to the index		Yes	
7.	Copies of the annexure are legible and attested. If not then better copies duly attested have been annexed.		Yes	
8.	Certified copies of all the requisite document have been filed		Yes	
9.	Certificate specifying that no case on similar grounds was earlier submitted in this court, filed		Yes	
10.	Case is with in time		Yes	
11.	That the value for the purpose of the court fee and jurisdiction has been mentioned in the relevant column			No
12.	Court fee in shape of stamp is affixed (for writ, 1000 for others is required)			Yes
13.	Power of attorney is in proper form			
14.	Memo of addresses filed		Yes	No
15.	List of books mentioned in the petition			
16.	The requisite number if spare copies attached (writ petition 3 Nos, Civil Appeal (SB-1, DB-2), civil revision (SB-1, DB-2))		Yes	
17.	Case (Revision/ Appeal / Petition etc) is filed in a prescribed form		Yes	
18.	Power of attorney is attached by jail authority (for jail prisoners only)			No

It is certified that the formalities / documents as required in column 2 to 18 above have been fulfilled.

Name: **Umar Khitab**
Advocate High Court
Signature _____

Dated: 15/06/2015
Umar Khitab
Advocate High Court/
Darul Qaza Mingora Bench Swat.

FOR OFFICE USE ONLY

Case No. _____

Case received on _____

Complete in all respect: Yes / No (If No the grounds) _____

Date in court _____

Signature _____

Reader

Dated: _____

Countersigned: _____

(Deputy Registrar)

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR

Service Appeal No 921 /2022

Nisar Ahmad S/o Hazrat Bilal R/o Saidu Sharif, Tehsil Babozai,
District Swat.

.....Appellant

VERSUS

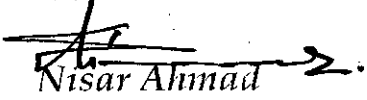
The Secretary of (E&SE) Department, Khyber Pakhtoonkhwa,
Peshawar & other

.....Respondents

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Appellant


Nisar Ahmad

In person 

Umar Khitab
Advocate High Court/
Darul Qaza Mingora Bench Swat.

mob: No 0345-9524854

(1)

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

Service Appeal No 921 /2022

Diary No. 349

Dated 17-6-2022

Nisar Ahmad S/o Hazrat Bilal R/o Saidu Sharif, Tehsil Babozai, District Swat.

.....Appellant

VERSUS

1. The secretary of (E&SE) Department, Khyber Pakhtoonkhwa, Peshawar.
2. Secretary Government of Khyber Pakhtoonkhwa, Establishment Department, Peshawar.
3. Director Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar.

.....Respondents

APPEAL UNDER SECTION 4 OF SERVICE TRIBUNAL ACT 1974 READ WITH ANY OTHER RELEVANT PROVISIONS AGAINST THE IMPUGNED ORDER DATED: 04-02-2022 WHEREBY THE APPELLANT HAS BEEN IGNORED ILLEGALLY, UNLAWFULLY, WITHOUT ANY AUTHORITY, AGAINST THE LAW FOR PROMOTION TO THE POST OF BUDGET & ACCOUNTS OFFICER PASSED BY RESPONDENT NO.3.

Filed to-day

Registrar

17/6/2022

PRAYER:

ON ACCEPTANCE OF THIS SERVICE APPEAL THE IMPUGNED ORDER PASSED BY RESPONDENT NO.3 DATED: 04-02-2022 MAY KINDLY BE MODIFIED, AND THE APPELLANT MAY KINDLY BE PROMOTED FOR THE POST OF BUDGET & ACCOUNTS OFFICER WITH ALL BACK SERVICE BENEFITS.

ANY OTHER RELIEF, DEEMED FIT IN THE CIRCUMSTANCES MAY ALSO BE AWARDED IN FAVOR OF APPELLANT AGAINST RESPONDENTS.

Respectfully Sheweth:

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The appellant very earnestly seeks permission to plead the grievances at the hand of respondents and seeks legal solace while invoking the constitutional jurisdiction of this Hon'ble court as follows:

Facts leading to this Service Appeal.

1. That the appellant is the permanent resident of Saidu Sahrif, Tehsil Babozai, District Swat. (Copy of CNIC is attached as annexure "A")
2. That the appellant was initially appointed as Junior Clerk vide order dated 09-03-1980 in Elementary & Secondary Education. (Copy of appointment order is attached as Annexure "B")
3. That the appellant was promoted to the post of Senior Clerk on 30-09-1990 while again promoted to the post of Assistant on 28-05-2014 as well as promoted as Superintendent on 31-05-2019. (Copies of Service history is attached as Annexure "C")
4. That vide order dated 29-03-2021 the appellant was adjusted as Budget & Accounts Officer in the office of DEO (Female) Swat on own pay scale. (Copy of adjustment order is attached as Annexure "D")
5. That vide letter No. 2915-87 / F. No. A-23 / Supdt to B&AO / Promotion / 2021 dated Peshawar the 07-01-2022 ACR,s of last 5 years were requisite from 28Suprentendants the department wherein it has been clearly mentioned to submit the same

before 25-01-2022 with covering letter of the DEO concerned on priority basis, which has been submitted by the department. (Copy of letter *ibid* is attached as annexure "E")

6. That vide letter dated 04-02-2022 the ACR,s of the appellant was declared as completed, and total number of 35 of Superintendents names mentioned in the letter which is clearly contradicted with letter No. 2915-87 dated 07-01-2022. (Copy of letter *ibid* is attached as annexure "F")
7. That the L.P.R of the appellant was sanctioned on 14-01-2022, however the appellant got retired on 31-03-2022. (Copy of L.P.R is attached as annexure "G")
8. That the respondent No. 3 has not recommended the appellant name for promotion to the post of B&AO to the Departmental Promotion Committee, hence being aggrieved from the illegal act of respondents. The appellant submitted Departmental Appeal through proper channel before the Director Elementary & Secondary Education KPK at Peshawar which was forwarded in original by the DEO (F) Swat in original vide No. 1286 dated 22-02-2022 the respondent No. 3. The appellant appeal has not yet been decided. (Copy of Departmental Appeal is attached as annexure "H")
9. That up till now the appellant has been kept deprived from his right, hence the appellant is going

to file the instant Service Appeal inter alia on the following grounds.

4

GROUNDS:

- i) **That** the impugned order of respondent No 3 is against the law, facts, material available on record. Hence liable to be set aside.
- ii) **That** the appellant is well eligible and full filling the required requirements as well as eligible for criteria of promotion. Pertinent to mention here that the appellant has completed his entire period of service with zeal and enthusiasm, but erroneously deprived by from his right by the respondents which is also against the fundamental rights given by the constitution of Pakistan 197.
- iii) **That** the appellant has not been treated equally and in accordance with the constitution of the Islamic Republic of Pakistan 1973.
- iv) **That** not promoting the appellant for the post of B&AO by the respondents despite of having eligibility and seniority is against the law, facts, illegal, unlawful, unconstitutional, and base on mala-fide and norms of natural justice, hence need indulgence of this august Court.

- 5
- v) *That the appellant has not been treated in accordance with law and rules on the subject noted above and such the respondents violated Article 4 and 25 of constitution of Pakistan 1973.*
- vi) *That the respondents acted in arbitrary and malafide manner by not promoting the appellant for the post ibid.*
- vii) *That despite of 42 years of clean and neat service of the appellant, the appellant was ignored for the promotion, which is not tenable under the law and the constitution of Pakistan as prevailing rules.*
- viii) *That as per letter No. SO (PSB) ED / 1-25/2021 / KC dated Peshawar, the January 17, 2022, whereas it is crystal clear that send the working paper in the first week of March of so that the meeting be arranged. It is pertinent to mention here that in the letter ibid some instruction regarding employees going to be retire in near future were also been given. The relevant portion is as under:-*

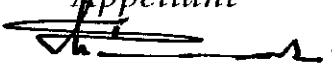
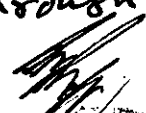
Most important, working papers of the officers who are at the verge of retirement and falling in the promotion zone must be forwarded on priority basis.

2. I am further directed to say that no working paper will be received after the mentioned cutoff

date and that the Administrative Department will be responsible for any delay in submission of working papers and the resultant deprivation of any officer from promotion / consideration,

- ix) *That the impugned order has been passed in violation of Khyber Pakhtunkhwa Efficiency and Discipline Rules 1973, (Amended in 2011).*
- x) *That the appellant has not been dealt with in accordance with law and rules regulating service of the appellant.*
- xi) *That the entire proceeding has been conducted in derogation of law and rules.*
- xii) *That the impugned order of respondents is whimsical, capricious and founded on surmises and conjectures.*
- xiii) *That other grounds not specifically raised will be argued with the prior permission of this Honorable Court at the time of arguments.*

It is, therefore, very humbly prayed that on acceptance of this appeal, the impugned order dated 04-02-2022 passed by respondent No 3 may kindly be modified and the appellant may kindly be promoted to the post of budget & accounts officer with all service benefits. Any other remedy which is just, appropriate and efficacious may also be awarded in favor of the appellant please.

Appellant

 Nisar Ahmad
 Through

 Umar Khitab
 Advocate High Court
 Darul Qaza Mingora Bench Swat,

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BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR

Service Appeal No _____/2022

Nisar Ahmad S/o Hazrat Bilal R/o Saidu Sharif, Tehsil Babozai, District Swat.

.....Appellant

VERSUS

1. The secretary of (E&SE) Department, Khyber Pakhtoonkhwa, Peshawar.
2. Secretary Government of Khyber Pakhtoonkhwa, Establishment Department, Peshawar.
3. Director Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar.

.....Respondents

AFFIDAVIT

I, Nisar Ahmad S/o Hazrat Bilal R/o Saidu Sharif, Tehsil Babozai, District Swat, do hereby solemnly affirm and declare on oath that all the contents of this Service Appeal are true and correct to the best of my knowledge and belief, and nothing has been concealed from this Honorable Court.

ATTESTED



DEPONENT

[Signature]
Nisar Ahmad

In person

(6)

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR

Service Appeal No _____/2022

Nisar Ahmad S/o Hazrat Bilal R/o Saidu Sharif, Tehsil Babozai, District Swat.

.....Appellant

VERSUS

1. The Secretary of (E&SE) Department, Khyber Pakhtoonkhwa, Peshawar.
2. Secretary Government of Khyber Pakhtoonkhwa, Establishment Department, Peshawar.
3. Director Elementary & Secondary Education Department Khyber Pakhtoonkhwa, Peshawar.

.....Respondents

ADDRESSES OF THE PARTIES

ADDRESS OF THE APPELLANT

Nisar Ahmad S/o Hazrat Bilal R/o Saidu Sharif, Tehsil Babozai, District Swat.


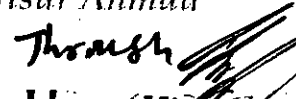
CNIC:- 15602-0255916-1

Cell: 03459518255

ADDRESSES OF THE RESPONDENTS

1. The Secretary of (E&SE) Department, Khyber Pakhtoonkhwa, Peshawar.
2. Secretary Government of Khyber Pakhtoonkhwa, Establishment Department, Peshawar.
3. Director Elementary & Secondary Education Department Khyber Pakhtoonkhwa, Peshawar.

APPELLANT


Nisar Ahmad
Through

Umar Khitab
Advocate High Court/
Darul Qaza Mingora Bench Swat.

Anex B

10

OFFICE ORDER

APPOINTMENT.

The following J/Clerk are hereby appointed in NPS No.5 (Rs.290-10-450/12-450) Rs 290/-P.M.plus usual allowances as admissible under the rules against the vacant posts noted against each from the date of taking over the charge in the interest of public service.

<u>S.No.</u>	<u>Name of Candidate.</u>	<u>School</u>	<u>Remarks.</u>
1.	Nisar Ahmad S/O Hazrat Bilal, Resident of Saidu Sharif.	GHS Derai, (Swat).	against vacant , J/Clerk post w.e.f. 1.4.80 vice Fazli- Yazdan.
2.	Mohd Rafiq, S/O Sammar. Resident of Saidu Sharif.	GHS Nawagai.	against Vacant post, vice Nasib Zada.

CONDITIONS:-

1. Charge reports should be submitted to all concerned in duplicate.
2. No.T.A/D.A & transfer grant is allowed being first appointment under the rules.
3. The appointment is purely temperery and subject to termination at any time with out notice and assigning any reason. In case of resignation he should have to submit one Month's prior notice to the department or forfeit one Month's pay to the Government in leau thereof.
4. He should produce his Health & Age certificate from the Medical Superintendent concerned.
5. The Head of the instution concerned is required to check the original certificates of the candidate concerned before handing over the charge.
6. The candidate should not be handed over the charge if his age exceed 28 years or below 18 years.

(HABIBUR RAHMAN)
DISTRICT EDUCATION OFFICER,
SWAT SAIDU SHARIF.

OFFICE OF THE DISTRICT EDUCATION OFFICER SAIDU SHARIF.

N^o 1913-16 /A-58 Dated Saidu Sharif the 9/3/1980

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

1. The Headmaster Govt: High School Derai(Swat).
2. The Headmaster Govt:High School Nawagai(Swat).
- 3-4 The Candidate Concerned.

(Signature)
(Superintendent)
District Education Officer (F)
Swat.

(Signature)
DISTRICT EDUCATION OFFICER,
SWAT SAIDU SHARIF.

(Signature)
8/3

(Signature)
8/3

Annex C

(11)

OFFICE OF THE DISTRICT COMPTROLLER OF ACCOUNTS SWAT

No. 66318

dated 31/12 /2021

HISTORY OF SERVICE

Name : Nisar Ahmad Father Name: Hazrat Bilal
Personal #: 66318 Date of Birth: 01.04.1962
Date of 1st Apptt: 01.04.1980 Date of Rtd: 31.03.2022 (AN)
Basic Pay: Rs.55670/- CNIC #: 15602-0255916-1

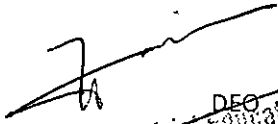
S.#:	Post	BPS	Station / Office	From	To
01	Junior Clerk	05	GHS Dehrai, Swat	01.04.1980	28.02.1982
02	Junior Clerk	05	DEO Male Swat	01.03.1982	10.08.1982
03	Junior Clerk	05	GHS Minogra No.4 Swat	11.08.1982	30.11.1983
04	Junior Clerk	05	DE (S) Mkd	01.12.1983	29.09.1990
05	Senior Clerk	07	Director Edu Peshawar	30.09.1990	05.11.1990
06	Senior Clerk	07	DE (S) Mkd	06.11.1990	03.12.1990
07	Senior Clerk	07	SDEO Male Alpurai	04.12.1990	09.01.1991
08	Senior Clerk	07	SDEO Female Swat	10.01.1991	06.02.1991
09	Senior Clerk	07	DEO Male Primary Swat	07.02.1991	03.09.1996
10	Senior Clerk	07	DE MKD Div:	04.09.1996	31.08.1998
11	Senior Clerk	07	GHSS Mankyal, Swat	01.09.1998	31.05.1999
12	Senior Clerk	09	DEO Female Primary Swat	01.06.1999	30.06.2001
13	Senior Clerk	09	EDO, Swat	01.07.2001	27.05.2014
14	Assistant	16	SDEO Female Swat	28.05.2014	16.10.2017
15	Assistant	16	DEO Male Swat	17.10.2017	30.05.2019
16	Superintendent	17	DEO Female Swat	31.05.2019	31.03.2021
17	Supdt / B&AO	17	DEO Female Swat	01.04.2021	31.03.2022


Qualifying Service Certificate

Non-Gazetted Period = w.e.f: 01.04.1980 to 27.05.2014

Gazetted Period: w.e.f: 28.05.2014 to 31.03.2022

Total Qualifying Servicer: (41-11-30) YY-MM-DD


District Education Officer (F)
Swat.


District Accountant Swat



**GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT**

Dated Peshawar the March 29, 2021

CORRIGENDUM

No. SO(SM)E&SED/1-3/2020/Promotion of Assistant (BS-16) to Suptd (BS-17): In partial modification of this Department notification of even number dated 10.03.2021, the Competent Authority is pleased to order revised posting/adjustment of the following Superintendent (BS-17), on the posts/stations, as mentioned against each:

S#	S# In previous order	Name, designation & present place	Correction/Revised posting
1.	53	Mr. Muhammad Bashir DEO (F) Abbottabad	Suptd (BS-17) SDEO (F) Abbottabad
2.	76	Mr. Abdur Rasheed Suptd BS-17 working as B& AO DEO (F) Abbottabad	His name may be read as Abdur Rehman instead of Abdur Rasheed
3.	37	Mr. Fazle Rehman PITE Peshawar	SDEO (M) Kohat AVPAfter actualization at Kohat he will join the post of B&AO at PITE Peshawar
4.	64	Mr. Rahim Dil Khan SDEO Female Lakki Marwat	Suptd (BS-17) DEO (M) Bannu
5.	40	Mr. Khurshid Ahmed DEO Female Kolai Palas Kohistan	B&AO DEO (M) Charsadda
6.	67	Mr. Muhammad Yousaf DEO Male Torghar	Suptd (BS-17) SDEO (F) Battagram
7	5	Sawar Khan DEO Female Mardan	Suptd DEO (M) Buner
8	59	Mr. Mahboob Ahmad SDEO Female Samarbagh Dir Lower	Suptd (BS-17) SDEO (M) Timergara Dir Lower
9		Mr. Muhammad Nawaz Awaiting posting	B&AO DEO (F) Charsadda
10		Mr. Nisar Ahmad DEO (Female) Swat	B&AO DEO (Female) Swat
11	63	Riaz Ahmad Suptd DEO Male Swat	Suptd DEO (Female) Swat (V.S/O)
12	21	Mr. Umar Zeb DEO Female Buner	Suptd (BS-17) SDEO (Female) Daggar Buner

Encl: of even No. & Date

SECRETARY

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officers (Male), Concerned.
4. District Accounts Officer, Concerned.

Umar Khitab
 Advocate High Court
 Darul Qaza Mingora Bench Swat.



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

5. PS to Minister E&SE Department.
6. PS to Secretary E&SE Department.
7. Director, EMIS E&SE Department.
8. Superintendent concerned.
9. Master file.

(MUJEEB (R) REHMAN)
SECTION OFFICER (SCHOOLS MALE)



CERTIFICATE OF TRANSFER OF CHARGE

(12)

1. Certified that I have on the Forenoon of this day 01/04/2021 respectively made over and received charge of the office of the, District Education Officer (Female) Swat as Budget & Accounts Officer BPS-17 Vide, Secretary Elementary & Secondary Education Department Corrigendum No, SO(SM) E&SED/1-3/2020/Promotion of Assistant (BS-16) to Supdt: (BS-17) Dated, 29/03/2021.at S.No 10.
2. Particulars of cash and important secret and confidential document handed over are noted on the reverse: -

Signature of relived:-

Govt: Servant. Vacant

Designation: - B& AO BPS-17

Station: - O/O DEO (F) Swat.

Signature of receiving: 

Govt: Servant. NISAR AHMAD

Designation: - B&AO BPS-17

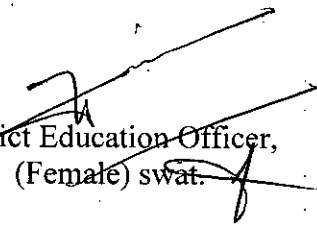
Dated:- 01/04/2021. (F.N)

Endst: No. 3655-59 / Charge Report.

Dated, 9 14 /2021

Forwarded to the:

1. P.S to Secretary Elementary & Secondary Education KPK Peshawar.
2. Director Elementary & Secondary Education KPK Peshawar.
3. District Comptroller of Accounts Swat.
4. District Education Officer (Male) Swat.
5. Cashier local Office.


District Education Officer,
(Female) swat.

Ihsan


Umar Khitab
Advocate High Court/
Darul Qaza Mingora Bench Swat.

GOVERNMENT OF KHYBER PAKHTUNKHWA

ESTABLISHMENT DEPARTMENT

No. SO (PSB) ED/1-25/2021/KC
Dated Peshawar, the January 17, 2022

Ann E

(14)

To

All Administrative Secretaries
to the Govt. of Khyber Pakhtunkhwa.

Subject: - **STREAMLINING OF PROVINCIAL SELECTION BOARD (PSB) MEETINGS.**

Dear Sir,

I am directed to refer to this Department letter of even No. dated 23.12.2021 on the subject and to say that the PSB meeting has been scheduled to be held in 1st week of March 2022. The working papers (complete in all respects) for promotion to be placed before the PSB meeting may be furnished well before the cut off date which is fixed as 18.02.2022. Most importantly, working papers of the officers who are at the verge of retirement and falling in the promotion zone must be forwarded on priority basis.

2. I am further directed to say that no working paper will be received after the mentioned cut off date and that the Administrative Department will be responsible for any delay in submission of working papers and the resultant deprivation of any officer from promotion/consideration.

Yours faithfully,

[Signature] 17.1.2022
SECTION OFFICER (PSB)

ENDST. EVEN NO. & DATE.

copy is forwarded to

1. All Section Officers in Regulation Wing of Establishment Department.
2. PS to Secretary Establishment, Govt. Khyber Pakhtunkhwa
3. PS to Special Secretary Regulation Establishment Department.
4. PAs to Additional Secretaries (Reg-I, & II), Establishment Department.
5. PAs to Deputy Secretaries (Reg-I, II & III), Establishment Department.

[Signature] 17.1.2022
SECTION OFFICER (PSB)

[Signature]
Umar Khitab
Advocate

Umar Khitab
Advocate High Court
Darul Qaza Mingora Bench Swat



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Ann F

15

To,

1. The Director DCTE Abbottabad
2. The Director DPD Peshawar
3. Additional Director Newly Merge District (NMD)
4. All the District Education Officers (NMD/ Male/ Female)
Khyber Pakhtunkhwa

Subject: ACR/NON INVOLVEMENT CERTIFICATE/SYNOPSIS FOR THE PROMOTION OF SUPERINTENDENT TO B&AO / SUBMISSION OF VACANT AND WRONGLY OCCUPIED POST OF B&AO

Memo:

I am directed to refer to this office letter No. 2915-87 dated 07/01/2022 on the subject cited above and to ask you once again to submit the ACRs/Non Involvement Certificates (Fresh) along with Synopsis (7 copies) of the following Supdts: BPS-17 for the period mentioned against each before 10/02/2022 with covering letter of the DEO concerned on priority basis as the promotion case of Superintendent to Budget & Account Officer is being under process.

Notes: - Refusal of those Officers who are not willing for promotion must be submitted to this office.

S/N	Name of Officer with Designation & Duty Station	Qualification	D.O.B	Domicile	Date of Ist Entry in Edu: Deptt:	Date of Present Posting	Remarks
1.	Naik Sha, Supdt., DE& SE KP Peshawar	B.A	15-05-1964	Peshawar	01-09-1987	22-12-1999	Last Five Years ACR Required
2.	Gul Bahadar, Supdt., DEO (F) Mardan	B.A	28-12-1967	Mardan	01-01-1993	16-04-2009	Last Five Years ACR Required
3.	Qamar Zaman, Supdt., DEO (M) Swat	B.SC	01-06-1962	Peshawar	01-01-1984	07-03-2018	Last Five Years ACR Required
4.	Wazir Ali, Supdt.: DEO Kurram	B.A	29-03-1965	Kurram	14-11-1984	07-03-2018	ACR Completed ✓
5.	Tariq Parvez, Supdt., SDEO (F) Haripur	M.A	01-01-1963	Haripur	24-04-1982	31-05-2019	ACR Completed ✓
6.	Azmat Ali, Supdt., RITE (M) Mardan	B.A	01-06-1963	Mardan	17-11-1984	31-05-2019	ACR Completed ✓
7.	Ayaz Khan, Supdt., SDEO Male Charsadda	F.A	17-01-1964	Charsadda	01-12-1984	31-05-2019	ACR Completed ✓
8.	Mehboob Khan, Supdt., AEO Orakzai Agency	M.A	04-01-1967	Orakzai	01-12-1984	31-05-2019	ACR Completed ✓

CF

Umar Khitab Advocate

Umar Khitab
Advocate High Court
Barul Qaza Mingora Bench Swat

[Handwritten Signature]

Name of Officer with Designation & Duty Station	Qualification	D.O.B	Domicile	Date of 1st Entry in Edu. Deptt.	Date of Present Posting	Remarks
9. Mehtab ur Rahman, Supdt., DEO (M) Lakki.	B.A	16-05-1987	Lakki	05-09-2011	31-05-2019	ACR Completed
10. Ghayas ud Din, Supdt., DEO (M) Shangal	B.Com	15-03-1963	Shangla	09-03-1982	31-05-2019	ACR Completed
11. Muhammad Tariq, Supdt., SDEO (F) Peshawar	B.A	01-05-1962	Peshawar	24-08-1980	31-05-2019	Last Five Years ACR Required
12. Muhammad Ikram, Supdt., DEO (M) Dir Lower	M.A	15-03-1967	Dir Lower	06-10-1985	31-05-2019	ACR Completed
13. Fayaz Ahmad, Supdt., D.E (FATA) Peshawar	B.A	01-10-1963	Peshawar	01-12-1985	31-05-2019	ACR Completed
14. Rooh Ul Amin, Supdt., D.E (FATA) Peshawar	F.A	12-04-1965	FATA	07-12-1985	31-05-2019	ACR Completed
15. Farooq Hameed, Supdt., AEO FR D I Khan	M.A	04-05-1967	FATA	08-12-1985	31-05-2019	ACR Completed
16. Atta Ullah Khan, Supdt., DCTE Abbotabad	B.A	03-03-1967	Abbottabad	07-02-1991	31-05-2019	Last Five Years ACR Required
17. Muhammad Farooq, Supdt., DCTE Abbottabad	B.A	27-02-1965	Abbottabad	01-08-1985	31-05-2019	ACR Completed
18. Samandar Khan, Supdt., SDEO (M) Chitral	B.A	08-01-1963	Chitral	24-11-1981	31-05-2019	ACR Completed
19. Nisar Ahmad, Supdt., DEO (M) Swat	B.SC	01-04-1962	Swat	01-04-1980	31-05-2019	ACR Completed
20. Nawaz Khan, Supdt., DEO (F) Nowshera	M.A	20-09-1962	Mardan	01-09-1981	31-05-2019	ACR Completed
21. Fazli Qadeem, Supdt., SDEO (M) Bunir	B.A	03-04-1962	Mardan	17-09-1981	31-05-2019	ACR Completed
22. Shahzad Gul, Supdt., SDEO (F) Dargai	F.A	03-08-1963	Mardan	22-09-1981	31-05-2019	ACR Completed
23. Liaqat Ali, Supdt., DEO (M) Bunir	M.A	15-05-1962	Mardan	01-08-1980	31-05-2019	ACR Completed
24. Shazad Akhtar, Supdt., DEO (F) Torghar.	B.A	01-07-1963	Abbottabad	19-10-1981	31-05-2019	ACR Completed
25. Wali Rehman, Supdt., GEC (M) Ghoriwala	B.Com	15-06-1963	Dannu	26-11-1981	31-05-2019	ACR Completed
26. Mumtaz Hassan, Supdt., DEO Female Peshawar	B.SC	3/6/1963	Chursudda	12/9/1981	10-03-2021	Last Five Years ACR Required
27. Muhammad Ajmal Supdt., DEO Male Mansehra	M.A	1/5/1964	Mansehra	1/5/1982	10-03-2021	Last Five Years ACR Required

Umar Khilaf,
 Advocate High Court
 Darul Qaza Mingora Bench Swat.

	Name of Officer with Designation & Duty Station	Qualification	D.O.B	Domicile	Date of 1st Entry in Edu. Deptt:	Date of Present Posting	Remarks
28.	Muhammad Wali Khan, Supdt: SDEO Female Lower Chitral	B.A	2/10/1964	Chitral	24/02/1982	10-03-2021	Last Five Years ACR Required
29.	Sarwar Khan, Supdt.; DEO Female Mardan	F.A	5/1/1963	Mardan	12/12/1981	10-03-2021	Last Five Years ACR Required
30.	Shaukat Ali, Supdt.; DEO Female Swabi	M.A	1/7/1963	Swabi	17/05/1982	10-03-2021	Last Five Years ACR Required
31.	Muhammad Kamil, Supdt.; DEO Male Swabi	B.A	18/04/1964	Swabi	7/12/1982	10-03-2021	Last Five Years ACR Required
32.	Ghulam Sabir, Supdt.; Directorate of NMD	B.Com	20/03/1962	✓ Peshawar	18/08/1981	10-03-2021	Last Five Years ACR Required
33.	Ghulam Qadir, Supdt.; DEO Female Kohat	M.Sc	12/5/1962	✓ Kohat	9/1/1982	10-03-2021	Last Five Years ACR Required
34.	Muhammad Mubarik, Supdt.; SDEO Female Mansehra	F.A	7/11/1962	Mansehra	5/7/1982	10-03-2021	Last Five Years ACR Required
35.	Muhammad Khalid, Supdt.; DEO (M) DI Khan	F.A	20/05/1966	DIKhan	16/10/1984	10-03-2021	Last Five Years ACR Required

[Handwritten Signature]
2/2/22

Assistant Director (Admn)
Directorate E& Secondary Education
Khyber Pakhtunkhwa, Peshawar

Endst: No. _____
Copy of the above is forwarded for information to:-
1. PA to Director Elementary and Secondary Education KPK Peshawar.

[Handwritten Signature]
Assistant Director (Admn)
Directorate E& Secondary Education
Khyber Pakhtunkhwa, Peshawar

[Handwritten Signature]
Umar Khitab
Advocate High Court
Darul Qaza Mingora Bench Swat.

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

No. 2915-87 /F.No.A-23/Supdt to B&AO/Promotion /2021

Dated Peshawar the 07/01 2022

Phone: 091-9225344

Email: ddndmr_esc@gmail.com

To,

1. The Director DCPE Abbottabad
2. The Director DPD Peshawar
3. Additional Director Newly Merge District (NMD)
4. All the District Education Officers (NMD/ Male/ Female)
Khyber Pakhtunkhwa

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2/1/22

Subject: ACR/NON INVOLVEMENT CERTIFICATE/SYNOPSIS FOR THE PROMOTION OF SUPERINTENDENT TO B&AO / SUBMISSION OF VACANT AND WRONGLY OCCUPIED POST OF B&AO

Memo:

I am directed to refer to the subject noted above and inform you that the promotion case of Superintendent to Budget & Account Officer is being under process and to request you to submit the ACRs/Non Involvement Certificates (Fresh) along with Synopsis (7 copies) of the following Officers for the period mentioned against each before 25/01/2022 with covering letter of the DEO concerned on priority basis.

Notes: - Refusal of those Officers who are not willing for promotion must be submitted to this office.

S/N	Name of Officer with Designation & Duty Station	Qualification	D.O.B	Domille	Date of 1st Entry in Edu. Deptt.	Date of Present Posting	Remarks
1	Naik Sha. Supdt., DE & SE KP Peshawar	BA	15-05-1964	Peshawar	01-09-1987	22-12-1999	Last Five Years ACR Required
2	Gul Bahadar, Supdt., DEO (F) Mardan	BA	28-12-1967	Mardan	01-01-1993	16-04-2009	Last Five Years ACR Required
3	Qamar Zaman, Supdt., DEO (M) Swat	B.SC	01-06-1962	Peshawar	01-01-1984	07-03-2018	Last Five Years ACR Required
4	Tariq Parvez, Supdt., SDEO (F) Haripur	M.A	01-01-1963	Haripur	24-04-1982	31-05-2019	Last Five Years ACR Required
5	Azmat Ali, Supdt., RITE (M) Mardan	B.A	01-06-1963	Mardan	17-11-1984	31-05-2019	Last Five Years ACR Required
6	Ayaz Khan, Supdt., SDEO Male Charsadda	F.A	17-01-1964	Charsadda	01-12-1984	31-05-2019	Last Five Years ACR Required
7	Mehboob Khan, Supdt., AEO Orakzai Agency	M.A	04-01-1967	Orakzai	01-12-1984	31-05-2019	Last Five Years ACR Required
8	Mehboob Ur Rahman, Supdt., DEO (M) Lakki	B.A	16-05-1987	Lakki	05-09-2011	31-05-2019	Last Five Years ACR Required
9	Ghayas ud Din, Supdt., DEO (M) Shangal	B.Com	15-03-1963	Shangal	09-03-1982	31-05-2019	Last Five Years ACR Required
10	Muhammad Tariq, Supdt., SDEO (F) Peshawar	BA	01-05-1962	Peshawar	24-08-1980	31-05-2019	Last Five Years ACR Required
11	Muhammad Younis, Supdt., D.E (FATA) Peshawar	BA	01-10-1962	FATA	10-08-1982	31-05-2019	Last Five Years ACR Required
12	Aurangzeb, Supdt., DCPE Abbottabad	B.SC	07-12-1963	Abbottabad	01-05-1985	31-05-2019	Last Five Years ACR Required

	Name of Officer with Designation & Duty Station	Qualification	D.O.B	Domicile	Date of 1st Entry In Edu: Deptt	Date of Present Posting	Remarks
13	Muhammad Ikram, Supdt., GISS Gardai Bajour	M.A	15-03-1967	Dir Lower	06-10-1985	31-05-2019	Last Five Years ACR Required
14	Fayaz Ahmad, Supdt., D.E (FATA) Peshawar	B.A	01-10-1963	Peshawar	01-12-1985	31-05-2019	Last Five Years ACR Required
15	Rosh Ul Amin, Supdt., D.E (FATA) Peshawar	F.A	12-04-1965	FATA	07-12-1985	31-05-2019	Last Five Years ACR Required
16	Farooq Hameed, Supdt., AEO FR D I Khan	M.A	01-05-1967	FATA	08-12-1985	31-05-2019	Last Five Years ACR Required
17	Alta Ullah Khan, Supdt., DCTE Abbottabad	B.A	03-03-1967	Abbottabad	07-02-1991	31-05-2019	Last Five Years ACR Required
18	Sikandar Shah, Supdt., DEO (F) Swabi	B.Com	02-02-1962	Swabi	12-02-1981	31-05-2019	Last Five Years ACR Required
19	Muhammad Farooq, Supdt., DCTE Abbottabad	B.A	27-02-1965	Abbottabad	01-08-1985	31-05-2019	Last Five Years ACR Required
20	Samandar Khan, Supdt., SDEO (M) Chitral	B.A	08-01-1963	Chitral	24-11-1981	31-05-2019	Last Five Years ACR Required
21	Nisar Ahmad, Supdt., DEO (M) Swat	B.Sc	01-04-1962	Swat	01-04-1980	31-05-2019	Last Five Years ACR Required
22	Nawaz Khan, Supdt., DEO (F) Nowshera	M.A	20-09-1962	Mardan	01-09-1981	31-05-2019	Last Five Years ACR Required
23	Fazli Qadeem, Supdt., SDEO (M) Bunir	B.A	03-04-1962	Mardan	17-09-1981	31-05-2019	Last Five Years ACR Required
24	Shalizad Gul, Supdt., SDEO (F) Dargai	F.A	03-08-1963	Mardan	22-09-1981	31-05-2019	Last Five Years ACR Required
25	Liaqat Ali, Supdt., DEO (M) Bunir	M.A	15-05-1962	Mardan	01-08-1980	31-05-2019	Last Five Years ACR Required
26	Shazad Akhtar, Supdt., DEO (F) Torghar	B.A	01-07-1963	Abbottabad	19-10-1981	31-05-2019	Last Five Years ACR Required
27	Wali Rehman, Supdt., GIC (M) Ghoriwala	B.Com	15-06-1963	Bannu	26-11-1981	31-05-2019	Last Five Years ACR Required
28	Muhammad Zubair, Supdt., DCTE, Abbottabad	B.A	01-05-1963	Abbottabad	14-11-1981	31-05-2019	Last Five Years ACR Required

19

8/07/22

Assistant Director (Admn)
Directorate E& Secondary Education
Khyber Pakhtunkhwa, Peshawar

Endst: No. _____

Copy of the above is forwarded for information to:-

1. PA to Director Elementary and Secondary Education KPK Peshawar.

Umar Khitab
Advocate

Umar Khitab
Advocate High Court
Darul Qaza Mingora Bench Swat

Assistant Director (Admn)
Directorate E& Secondary Education
Khyber Pakhtunkhwa, Peshawar



KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Annex 67

Dated Peshawar the January 14th, 2022

20

NOTIFICATION

NO. AO/E&SE/6-32/LPR/Swat:

In pursuance of Section-13 (1) of Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973), Mr. Nisar Ahmad, Superintendent (BS-17), O/o DEO (Female), Swat shall stand retire from Government service w.e.f. 31-03-2022 (A.N) on attaining sixtieth (60th) year of age, as his date of birth is 01-04-1962.

2. The Competent Authority is further pleased to allow him 365 days encashment of leave in lieu of LPR as admissible to him under the Revised Leave Rules, 1981.

Endst: of even No. & date:

SECRETARY
Govt. of Khyber Pakhtunkhwa
Elementary & Secondary Edu: Department

Copy forwarded to:

1. The Director, Elementary & Secondary Education, Peshawar.
2. The District Accounts Officer, Swat.
3. The District Education Officer (Female), Swat.
4. The Director, EMIS Cell, E&SE Department for uploading at official website.
5. The Section Officer (Schools/Male), Elementary & Secondary Education Department.
6. Mr. Nisar Ahmad, Superintendent (BS-17), O/o DEO (Female), Swat.
7. Master File.

NAD

Abmaef
(Superintendent)
District Education Officer (F)
Swat.

Abdul Ghaffar
(ABDUL GHAFFAR)

SECTION OFFICER (ACCOUNTS)

Ana H.

محترم جناب ڈائریکٹر صاحب محکمہ تعلیم صوبہ خیبر پختونخواہ پشاور۔

بوساطت :- ڈی ای او (زنانه) ضلع سوات

جناب عالی!

گزارش کی جاتی ہے کہ میں محکمہ تعلیم میں بحیثیت کلرک مورخہ: 01-04-1980 سے تاحال کام کر رہا ہوں اور میری مدت ملازمت کے تقریباً 42 سال مکمل ہونے کو قریب ہے۔

جناب عالی میں بحیثیت سپرنٹنڈنٹ پوسٹ پر ہوں۔ اور دفتر ڈی ای او (زنانه) سوات پچھلے ایک سال سے بجٹ اینڈ اکاؤنٹس آفیسر کے پوسٹ پر کام کر رہا ہوں۔ اور اپنی دفتری لیٹر نمبر 87-2415 مورخہ: 07-01-2022 برائے پروموشن آف سپرنٹنڈنٹ تا بجٹ اینڈ اکاؤنٹس آفیسر میں نے مکمل کاغذات اے سی آر برائے پانچ سال بابت لیٹر ڈی ای او (زنانه) سوات آفس نمبر 21 مورخہ: 08-01-2022 کے تحت جمع کرائے ہیں۔ جبکہ میں مورخہ: 2022-03-31 سے ریٹائر ہو رہا ہوں۔ آپ صاحبان سے عرض گزار ہوں کہ اگر آپ صاحبان مہربانی کر کے میری ترقی بحیثیت بجٹ اینڈ اکاؤنٹس آفیسر جلد از جلد کرانے کے احکامات صادر فرمائیں۔ تو مجھے اپنے ریٹائرمنٹ کے کاغذات بنانے میں اسانگی ہوگی۔ اور آپ صاحبان کا نہایت شکر گزار رہوں گا۔ شکریہ!

العارض

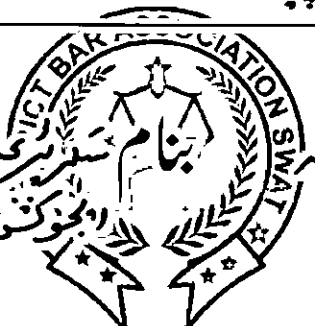
No 1286 / Dated 22/02/2022
Forwarded in original to
The Director E & SED KPK
Peshawar for immediate
necessary action please.

شمارہ
23-2
2022
3814
صبریٰ خان
RUL-74344814

District Education Officer (F)
Swat.

 <p>بار کونسل نمبر: 1058 بار ایسوسی ایشن نمبر: 375 رابطہ نمبر: 0345-9524884</p>	<p>101143</p>    <p>ڈسٹرکٹ بار ایسوسی ایشن سوات</p>
--	---

بعدالت جناب: چیمبر میں سرور کے ٹری بیورٹی چیمبر و مختوم خواہ لٹنار

<p>منجانب: آپیلنٹ</p>  <p>نثار احمد لٹنار بنام سید شرف مسعود ایڈووکیٹ ایسوسی ایشن سوات</p>	<p>دعویٰ اور خواست: سرور کے آپیل</p> <p>علت نمبر:</p> <p>مورخہ:</p> <p>جرم:</p> <p>تھانہ:</p>
--	---

بابت تحریر آئیکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے برائے پیروی مقدمہ

آن مقام جلالپور کیلئے عمر خٹاب ایڈووکیٹ کو مقرر کر کے اقرار کیا جاتا ہے، کہ صاحب موصوف کو مقدمہ کی کل کارروائی کو مکمل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث کرنے، دعویٰ، جوابات دعویٰ، اقبال دعویٰ اور درخواست برائے سرسبزی مقدمہ، منسوخی ڈگری یکطرفہ، اجراء و پیروی کرنے کا مختار ہوگا نیز دائر کرنے اپیل نگرانی، نظر ثانی و پیروی کرنے کا مختار ہوگا۔ اور مقدمہ مذکورہ کیلئے کل وقتی یا جزوی کارروائی کیلئے کسی دیگر وکیل یا مختار قانون کو اپنے ہمرازہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی جملہ مذکورہ اختیارات حاصل ہوں گے، اور اس کا ساختہ و پروا اختیار منظور قبول ہوگا، بدوران مقدمہ جو خرچہ و ہرجانہ کسی بھی سبب سے حاصل ہوگا، وہ وکیل موصوف وصول کرنے کا حقدار ہوگا، کوئی تاریخ پیشی مقام مذکورہ بالا سے باہر ہو، تو وکیل صاحب پیروی مقدمہ کرنے کے پابند نہ ہوں گے، مقدمہ کسی عدالت میں بعدم پیروی خارج ہونے یا ڈگری یکطرفہ ہونے کے صورت میں وکیل صاحب ذمہ دار نہیں ہوں گے، لہذا وکالت نامہ لکھ دیا کہ سندر ہے

مقام ملکہ سید شرف مسعود

Acceptance

ایڈووکیٹ دستخط: ...

نثار احمد لٹنار
ایڈووکیٹ