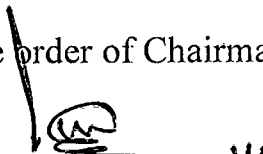


Form- A

## FORM OF ORDER SHEET

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

Case No.- 1557/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	03/11/2022	<p>The appeal of Mr. Musaddiq Abbas presented today by Mr. Kamran Khan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____.</p> <p>Notices be issued to appellant and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR**

APPEAL NO. 1557 /2022

MUSADDIQ ABBAS

VS

EDUCATION DEPT.

**INDEX**

S. NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of Appeal.	.....	1-4
2.	Educational testimonials	A	5-7
3.	Adjustment order dated 04-11-2021	B	8-11
4.	Request/ application	C	12.
	application	D	13.
5.			
6.	Notification dated 17-03-2022	E	14-15
7.	Departmental appeal	F	16-17
8.	Vakalatnama	.....	18.

**APPELLANT**

**THROUGH:**

  
**KAMRAN KHAN  
ADVOCATE**

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

APPEAL NO. 1557/2022

Mr. Musaddiq Abbas, Ex-CT (BPS-15),  
GHS Jalaka Mela, District Orakzai .....APPELLANT

**VERSUS**

- 1- The Secretary Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar
- 3- The District Education Officer, District Orakzai at Hangu.

.....RESPONDENTS

**APPEAL UNDER SECTION- 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE ORDER DATED 17.03.2022 WHEREBY THE APPOINTMENT NOTIFICATION DATED 29-10-2021 HAS BEEN WITHDRAWN AND AGAINST THE INACTION OF THE RESPONDENTS BY NOT DECIDING THE DEPARTMENTAL APPEAL FOR RETENTION OF LIEN WITHIN THE STATUTORY PERIOD OF NINETY DAYS.**

**PRAYER:**

That on acceptance of this appeal the impugned inaction of the respondents by not accepting the lien of the appellant on the previous post of CT (BPS-15) may very kindly be declared as illegal and ineffective upon the rights of the appellant. That lien of the appellant on his previous post of CT (BPS-15) may very kindly be accepted and he be allowed to rejoin his previous post of CT (BPS-15) with all back benefits including seniority. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

**R/SHEWETH:**

**ON FACTS:**

**Brief facts giving rise to the present appeal are as under:-**

- 1- That appellant is a qualified person and having Bachelor Studies in Electronics from a recognized university and he was appointed as CT (BPS-15) in the respondents department in the year 2020 and was posted in GHS Jalaka Mela, District Orakzai. Copies of the educational testimonials are attached as annexure.....A.

- 2- That during service the respondents department advertised different posts of SST (BPS-16) and the appellant being eligible and qualified for the subject posts applied for the post of SST (Math/Phy) (BPS-16) and accordingly appeared in test and interview and was appointed on the post of SST (Math/Phy) (BPS-16) vide notification 29-10-2021.
- 3- That in pursuance to the mentioned notification an adjustment order dated 04-11-2021 was issued whereby the appellant was posted in Govt. High Secondary School And Khel, District Orakzai. Copy of the adjustment order dated 04-11-2021 is attached as annexure .....B.
- 4- That before joining the post of SST (BPS-16) the appellant submitted an application/ request on 17-11-2021 for lien against the post of CT (BPS-15) according to the prevailing law and rules on the subject. Copy of the request/ application is attached as annexure .....C.
- 5- That after acceptance of the mentioned application the appellant submitted his arrival and started performing his duties quite efficiently and up to the entire satisfaction of his superiors.
- 6- That it is pertinent to mention here that all of sudden the monthly salary of the appellant was stopped by the respondents without any reasons and justifications. That when the appellant inquired from the concerned quarter about the stoppage of his salaries he was verbally informed that his appointment order has been withdrawn by the competent authority then and there the appellant submitted an application for the provision of the order/ notification through which the his appointment was withdrawn. Copy of the application is attached as annexure .....D.
- 7- That after the submission of the mentioned application the notification dated 17-03-2022 was handed over to the appellant whereby his appointment notification dated 29-10-2021 was withdrawn on the reason that appellant had obtained his B.Ed degree from an unrecognized university. Copy of notification dated 17-03-2022 is attached as annexure .....E.
- 8- That feeling aggrieved the appellant submitted a departmental appeal on 26-07-2022 for retention of his lien on his previous post of CT (BPS-15) but the same has not been decided within the statutory period of ninety days. Copy of the departmental appeal is attached as annexure.....F.

- 9- That appellant feeling aggrieved and having no other remedy filed the instant service appeal on the following grounds amongst the others.

**GROUND:**

- A- That the impugned inaction of the respondents by not accepting the departmental appeal for retention of his lien against the post of CT (BPS-15) and not allowing him to rejoin his previous post/ services are against the law, facts, norms of natural justice and material on the record hence not tenable and liable to be set aside.
- B- That appellant has not been treated by the respondent department in accordance with law and rules on the subject noted above and as such the respondent violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That the appellant had already submitted a request/ application for lien against the post of CT (BPS-15) as the same is his right and in light of the Fundamental Rule-14(A) he entitled to be allowed to rejoin his previous post.
- D- That it is pertinent to mention here that on similar point this Honorable tribunal had passed a number of judgments.
- E- That lien on a post is the legal right of an individual in service and for that reasons the appellant had submitted an application/ request for lien and even otherwise Fundamental Rule-14(A) protect this right of the appellant if he had not been confirmed on the subsequent post.
- F- That the inaction of the respondents by not allowing the appellant to rejoin his previous post/ service is against Article 4 of and also is the violation of the Article 38(e) of the constitution of the Islamic republic of Pakistan, 1973.
- G- That the appellant seeks permission to advance other grounds and proofs at the time of hearing.

APPELLANT

  
MUSADDIQ ABBAS

THROUGH:

  
KAMRAN KHAN

  
UMAR FAROOQ

&   
DILDAR KHAN  
ADVOCATES

**AFFIDAVIT:**

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

  
DEPONENT

15

"A"

S. No. 072361

Roll No. 126157

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ



Board of Intermediate and Secondary Education  
Peshawar  
P. W. F. P. Pakistan

Secondary School Certificate Examination

SESSION 2009- ANNUAL  
(Science Group)



This is to Certify that Musaddiq Abbas Son of Bahar Ali  
and a student of Peshawar Model School Boys-II Warsak Road Peshawar has passed the Secondary School Certificate  
Examination of the Board of Intermediate and Secondary Education, Peshawar held in March/April, 2009 as a Regular  
candidate. He obtained 861 Marks out of 1050 and has been placed in Grade A1 Representing Outstanding

The Candidate passed in the following subjects:

- |            |            |                     |                     |
|------------|------------|---------------------|---------------------|
| 1. English | 2. Urdu    | 3. Islamiyat (Comp) | 4. Pakistan Studies |
| 5. Maths   | 6. Physics | 7. Chemistry        | 8. Biology          |

Date of birth according to the admission form is 05 February, 1994.

Asstt Secretary

Secretary

This certificate is issued without alteration or erasure.

6

S NO. 43982

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

Roll No. 61399

Group. Pre-Engineering

# Board Of Intermediate & Secondary Education PESHAWAR

**Khyber Pakhtunkhwa (Pakistan)**

SESSION 2011-ANNUAL



This is to Certify that Musaddiq Abbas  
and a student of Govt College Peshawar

Son of Bahar Ali  
Registered No. 0506 B/GP-2009

has passed the Intermediate Examination of the Board of Intermediate & Secondary Education, Peshawar  
held in April, 2011 as a Regular candidate. He obtained 827 Marks out of 1100 and  
has been placed in grade A Representing Excellent. The examination was taken as a whole.

*[Signature]*  
Asstt Secretary

This Certificate is issued without alteration or erasure.

*[Signature]*  
Secretary



بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

# University of Peshawar Pakistan

This certifies that

**Musaddiq Abbas son of Bahar Ali**

having fulfilled all the requirements is hereby admitted to the degree of

**Bachelor Studies in Electronics**

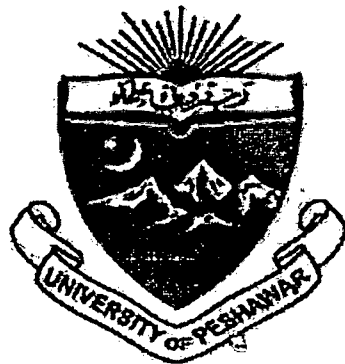
and is entitled to all the rights, honours and privileges thereunto appertaining.

Given this 2nd day of November, 2015.

Roll No: 20

Session: 2011-2015

Reg. No: 2011-U-11865



117231

Registrar

Vice Chancellor

"B"

8



OFFICE OF THE DISTRICT EDUCATION OFFICER-DRAKZAI  
Umar Plaza, Main Kohat Road, Muslimabad-Hangu.  
Phone # 0925-690017 Fax # 0925-690017  
Email: deodrakzai2020@gmail.com



**ADJUSTMENT ORDER:**

In pursuance of the Director Elementary and secondary Education Khyber Pakhtunkhwa Peshawar Encls: No. 14749-55.F.No. 01/SSTs Contract Appointment (1.1.18)/2021, dated 29/10/2021, the following SSTs are hereby adjusted against the vacant posts of SST(Bio/Chem), SST(Phy/Math), SST (General) & SST (IT)-Male in the schools noted against each in BPS: 16 @ (Rs.18910-1520-64510) @ Rs. 18910/- fixed plus usual allowances as admissible under the rules on adhoc/contract basis as per existing policy of the Provincial Government, in Teaching Cadre, on the terms and conditions as given below with immediate effect.

**ITEM NO. 1:- ADJUSTMENT OF SECONDARY SCHOOL TEACHERS (BIO/CHE) MALE (BPS: 16) ON ADHOC/CONTRACT BASIS**

S#	ETEA Roll No.	Name	Father's Name	CNIC	DOB	Score	Name of the School where adjusted
1	62234	KAZIM ALI	WAHID ALI	1420186332923	01/01/1998	120.18	GHS Kalaya
2	62125	JASEEM ALI	NIZAM ALI	1433195746523	01/01/1992	113.71	GHS Sabzi Khul
3	65786	WASIM AKRAM	MASTI GUL	2160422066439	04/04/1994	112.46	GHS Sarjara Kot
4	62123	DILAWAR HUSSAIN	SALEEM KHAN	2160385563143	12/03/1992	112.18	GHS Sulaman Khul
5	62762	ASAD ULLAH	ABDUL MADIQ	1430194602669	16/04/1998	111.39	GHS Idanday
6	62233	MUHAMMAD HUSSAIN	BAKHTAWAR GUL	1410152028257	27/12/1995	111.25	GHS Baghnak

**ITEM NO. 2:- ADJUSTMENT OF SECONDARY SCHOOL TEACHERS (MATH/PHY) MALE (BPS: 16) ON ADHOC/CONTRACT BASIS**

S#	ETEA Roll No.	Name	Father's Name	CNIC	DOB	Score	Name of the School where adjusted
1	75494	NAZ ULLAH	MINAWAR SHAH	2160152706635	02/03/1993	125.76	GHS Mashu Bazar
2	75218	IBRAHIM SHAH	AFSAR SHAH	1730175557587	30/07/1996	123.17	GHS Spidar

9

111	ZAMIR ALI	ISHIQ ALI	1430135747963	20/03/1992	121.10	GHS Paloosi	
76005	SYED MUHAMMAD AMJID GILANI	SYED MUHAMMAD SHAFEEQ GILANI	2160309293083	07/08/1995	120.21	GHS Khawa Sibri Khel	
5	72113	MUHAMMAD SOHAL	PIR AFZAL	2160377268689	03/04/1992	119.94	GHS Toof Bagh
6	72184	IRFAN ULLAH	NIJAZ MIN KHAN	2160365977185	02/05/1994	118.95	GHS Dran Sheikhan
7	72136	SYED JAVED HUSSAIN	SYED MIR ANWAR	2160384829487	25/03/1993	118.24	GHS Suleman Khel
8	72161	MUSADDIQ ABBAS	BAHAR ALI	2160353193175	05/02/1994	114.72	GHSS And Khel
9	72149	HAZRAT HALIM	MUHAMMAD HALIM	2160257269763	15/06/1993	113.94	GHS Inzar Pail

**ITEM NO. 3:- ADJUSTMENT OF SECONDARY SCHOOL TEACHERS (GENERAL) MALE (BPS: 16) ON ADHOC/CONTRACT BASIS**

S#	ETEA Roll No.	Name	Father's Name	CNIC	DOB	Score	Name of the School where adjusted
1	113517	MUHAMMAD ADNAN	QABIL SHAH	1410203868395	15/03/1995	128.16	GHS Damber Lasti
2	107113	ABDUL SAMAD	HAZRAT MEER	2160497436263	22/09/1998	124.09	GHS Spidar
3	106928	MUHAMMAD ILYAS	AZIZ UR REHMAN	1430187573809	14/08/1995	122.86	GHS Mandali
4	113183	SAHIBZADA QIAM UD DIN	KAMAL UD DIN	2160278107977	02/02/1989	122.20	GHS Chapper Mishri
5	106826	MOHIB ULLAH	LAL AJAB KHAN	2160273463479	15/07/1994	121.38	GMS Mir Mela Sheikhan
6	106598	IORAR NABI	QAIL KHAN	1430111522519	01/04/1992	119.28	GMS Dippe
7	106955	HAFIZ ULLAH	GUL SAIF KHAN	216049238209	05/02/1996	118.56	GMS Zanka Khel

*[Handwritten signature]*

10

**ITEM NO. 4:- ADJUSTMENT OF SECONDARY SCHOOL TEACHERS (IT) MALE (BPS: 16) ON  
ADHOC/CONTRACT BASIS**

Sl. No.	ETEA Roll No.	Name	Father's Name	CNIC	DOB	Score	Name of the School where adjusted
1	82160	AKHONZADA MUHAMMAD MUDASIR	AKHONZADA MUHAMMAD FARID	1430123494125	29/12/1994	132.17	GHS Mishu Bazar
2	86023	MUHAMMAD ABDULLAH	M SADDIQ ULLAH KHAN	2160487702705	12/02/1998	131.10	GHS Biland Khel
3	86316	ZAMIN MUSSAIN	MUHAMMAD ZAREEN	1410126688459	04/03/1998	126.24	GHS Kuroz
4	85852	MUHAMMAD ISLAM	BISMILLAH JAN	1730156073161	15/02/1995	125.17	GHS Manz Garhi
5	82130	SIRAJ KHAN	EISA KHAN	2160234140137	08/04/1993	120.26	GHS Ghijo
6	85420	ADNAN ULLAH	SHER GUL	1730177034251	07/04/1991	117.61	GHS Jalaka Mola

**TERMS & CONDITIONS:**

1. No TA/DA is allowed for joining his duty.
2. Charge report should be submitted to all concerned.
3. Appointments/Adjustments are purely made on temporary & contract basis initially for a period of one year with effect from 29-10-2021 to 28-10-2022.
4. They should not be handed over charge if their age exceed 35 year or fall below 19 years of age. Age relaxation case may be submitted to the competent authority.
5. If any meritorious candidate is deprived of appointment by this order, and the competent authority accepts his/her appeal, the appointment order of the low merit candidate will be with-drawn, and the adjustment order will be reviewed according to the merit.
6. Their appointments/adjustments are subject to the condition that the certificates/documents must be verified from the concerned authority. If anyone found guilty of producing bogus/take/forge/tempered Certificate/Testimonials, will be reported to the law enforcing agencies for further action(s) and his/her appointment/adjustment shall be de-notified from the date of its issuance.
7. Their services are liable to termination on one month's notice from either side. In case of leaving the department without notice, their one month pay/allowances shall be forfeited to the Government treasury.
8. Their salaries should be released subject to the verification of their academic/professional documents from their concerned boards/universities.
9. They should join their posts within 30 days of the issuance of this adjustment Order. In case of failure to join their posts in stipulated period, their adjustments will expire automatically and no subsequent appeal etc shall be entertained.
10. Health & Age Certificate should be produced from the Medical Superintendent OHQ Hospital Orakzai before taking over charge.
11. They will be governed by such rules and regulations as may be issued from time to time by the Government.

- (11)
12. Their contracts shall be terminated at any time, in case their performances are found unsatisfactory during their contract period, or will be extended for another year if found satisfactory.
13. Before handing over charge, once again their documents may be checked by the head of school concerned, and if they have not acquired the relevant qualifications as per rules, they may not be handed over the charge of the post, and the case may be reported to the Directorate of E&SE, for withdrawal of order(s).
14. The appointees shall take nine (09) months mandatory training at RPDC/DPD.
15. In case of not possessing B.Ed degrees by the SST (IT) candidates, the appointees shall get B.Ed degree within the stipulated period with effect from the date of issuance of this order, subject to the condition that if their contract is/are extended or services regularized. In case of failure in getting B.Ed degree within the stipulated period, their appointments orders shall stand cancelled automatically, under the rules notified vide No. SO (G)/E&SE/1-85/IT/2017, dated 24-04-2017.
16. Their adjustments are made school based. They will have to serve at the place of posting and their services are not transferrable to any other station.
17. In case of any discrepancies in their documents, oversight or clerical mistakes, the competent authority is authorized to modify or withdraw the adjustments orders of the candidates according to the rules policy.

**DISTRICT EDUCATION OFFICER**  
**DISTRICT ORAKZAI**

Endsl No. 9430-44 SSTS-Male/Orakzai/2020-21

dated: 6/11/2021

Copy forwarded for information and necessary action to the:

1. Accountant General Khyber Pakhtunkhwa Peshawar
2. Director Education (E&SE) Khyber Pakhtunkhwa Peshawar.
3. Additional Director (Merged Districts), Khyber Pakhtunkhwa.
4. Deputy Commissioner, Orakzai.
5. Deputy DEO (M), local office.
6. District Monitoring Officer, Orakzai.
7. District Account Officer District Orakzai.
8. PS to the Secretary to Govt Khyber Pakhtunkhwa E&SE Department, Peshawar.
9. PA to the Director (E&SE) Khyber Pakhtunkhwa Peshawar.
10. Principal/Head Master/in-charge Head Master concerned school.
11. Superintendent local office.
12. Accountant/Pay Clerk, local office.
13. Assistant Programmer/CO, HRMIS, local office.
14. SSTs Concerned.
15. Master File.

**DISTRICT EDUCATION OFFICER**  
**DISTRICT ORAKZAI**

"C."

12

To

The D.O.

District Orakzai at Mangu

Subject: Request for lien for a period of two years

Respected Sir,

It is stated with great reverence that I Mr. Musaddiq Abbas S/O Bahar Ali has been appointed against SST (Maths, Physics) post at GHSS Andkhel District Orakzai vide DEO order no. 9430-14 Date 07/13/2021. Before that I was performing my duties as CT teacher at GHS Jafaka Mela District Orakzai in RPS - 15. Now I have keen desire of lien for a period of two years, so that I may perform my duties with satisfaction and enthusiasm.

Kindly issue the orders of my lien period and obliged.

Note: Contingentum order may be issued in this regard if it is beneficial for the applicant.

Your Sincerely,

Musaddiq Abbas S/O Bahar Ali

SST (Maths, Physics) GHSS Andkhel

District Orakzai

Date: 17-11-2021

17/11/21

Musaddiq

دہلی، ۱۶ - دہلی سٹیٹ ٹرانسپورٹ کورپوریشن

جنرل - ۱۱۱ - جنرل سٹیٹ ٹرانسپورٹ کورپوریشن

۱۔ سٹیٹ ٹرانسپورٹ کورپوریشن (C.T.P.S.T.) دہلی  
ہاؤسنگ سیکشن اور ٹرنسپورٹ

۲۔ سٹیٹ ٹرانسپورٹ کورپوریشن (C.T.P.S.T.) دہلی  
ماتھس اور ٹرنسپورٹ

۳۔ سٹیٹ ٹرانسپورٹ کورپوریشن (C.T.P.S.T.) دہلی  
ٹرنسپورٹ سیکشن اور ٹرنسپورٹ

۴۔ سٹیٹ ٹرانسپورٹ کورپوریشن (C.T.P.S.T.) دہلی  
ٹرنسپورٹ سیکشن اور ٹرنسپورٹ

۵۔ سٹیٹ ٹرانسپورٹ کورپوریشن (C.T.P.S.T.) دہلی  
ٹرنسپورٹ سیکشن اور ٹرنسپورٹ

۶۔ سٹیٹ ٹرانسپورٹ کورپوریشن (C.T.P.S.T.) دہلی  
ٹرنسپورٹ سیکشن اور ٹرنسپورٹ

(۱۱)

سٹیٹ ٹرانسپورٹ کورپوریشن (C.T.P.S.T.) دہلی  
ٹرنسپورٹ سیکشن اور ٹرنسپورٹ

D No 1803  
04/7/22



## SST Appointment (Male) Orakzai

14 E

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

### NOTIFICATION

Consequent upon the advertisement bearing No. INF (P) 4222/2020, and the recommendations of the Departmental Selection Committee, the following candidates are appointed against the post of SST (General) and SST (Phy/Maths) Male in BPS-16 (Rs. 18910-1520-64510) @ Rs. 18910/- fixed plus usual allowances as admissible under the rules on adhoc / contract basis as per existing policy of the Provincial Government, in Teaching Cadre, on the terms and conditions as given below with immediate effect:

#### ITEM NO. 1: APPOINTMENT OF SSTs (GENERAL)

Sr. No	Roll No	Name of Candidate & Father's Name	D/O Birth	CNIC#	Permanent Address	Acad. Marks (out of 100)	ETEA Marks (out of 100)	Total Marks (out of 200)	Remarks
1	106455	Hafiz Ullah S/O Gul Saif Khan	5-2-1994	31611-2291234-9	All Khati Chakro Orakzai	60.84	58	118.50	The Appointment Notification No. 14794-35 Dated 29-10-2021 only to the extent of Hafiz Ullah S/O Gul Saif Khan, at S.No.7 in SST (G), is withdrawn with effect from the date of its issuance.
2		Said Qamar Abbas S/O Said Akbar Akmal	18-12-1990	31611-2291234-9	Har Muhammad Akbar Orakzai	64.61	56	117.61	Services are placed at the disposal of DEO Orakzai for further adjustment against the post of SST (G).

#### ITEM NO. 2: APPOINTMENT OF SSTs (PHY/MATHS)

Sr. No	Roll No	Name of Candidate & Father's Name	D/O Birth	CNIC#	Permanent Address	Acad. Marks (out of 100)	ETEA Marks (out of 100)	Total Marks (out of 200)	Remarks
1	72161	Musaddiq Abbas S/O Bahar Ali	5-2-1994	31609-5743121-1 31609-5743121-1	All Khati Chakro Orakzai	63.72	51	114.72	The Appointment Notification No. 14794-35 Dated 29-10-2021 only to the extent of Musaddiq Abbas S/O Bahar Ali, at S.No.8 in SST (P/M), is withdrawn with effect from the date of its issuance.
2	72163	Hazrat Akmal S/O Akmal Juman	6-5-1992	31609-5743121-1 31609-5743121-1		52.56	60	112.56	Services are placed at the disposal of DEO Orakzai for further adjustment against the post of SST (P/M).
3	72162	Shawin Ali S/O Akmal Ali	14-1-1992	31611-0635531-1	Musaddiq Chakro (Lacer) District Orakzai	60.41	49	112.21	
4	21106	Musaddiq S/O Bahar Ali	10-1-1993	31611-0635531-7	Har Muhammad Orakzai	57.99	53	110.91	

#### Terms and Conditions:-

1. The DEO is directed to adjust / post the appointees against the schools / posts already advertised on the web-site of ETEA.
2. No. TA/DA is allowed.
3. Charge reports should be submitted to all concerned in duplicate.
4. Appointment is purely on temporary & contract basis initially for one year with effect from 18-03-2022 to 17-03-2023.



They should not be handed over charge if they exceed 35 years or fall below 19 years of age. An appeal/relaxation case may be submitted to the Competent Authority.

If any meritorious candidate is deprived of appointment by this order, and the Competent Authority accepts his appeal, the appointment order of the low merit candidate will be with-drawn, and the adjustment order will be reviewed according to the merit.

Appointment is subject to the condition that the certificates / documents must be verified from the concerned authorities by the DEO (concerned). Anyone found guilty of producing bogus certificates/Degrees will be reported to the law enforcing agencies for further action, and his appointment order shall be de-notified from the date of its issuance.

Their services are liable to termination on one month's prior notice from either side. In case of leaving the department without notice their one month pay / allowances shall be forfeited to the Government.

Pay will not be drawn until and unless a certificate is issued by DEO (concerned) to the effect that their certificates are verified and found correct and genuine.

They should join their posts within 30 days of the issuance of this notification. In case of failure to join the post within 30 days, their appointment will expire automatically and no subsequent appeal shall be entertained.

Health and Age certificate should be produced issued by the Medical Superintendent concerned before taking over the charge.

Their services shall be terminated at any time, in case their performance is found unsatisfactory during the contract period, or will be extended for another year if found satisfactory.

The appointment is made on school based. They will have to serve at the place of posting and their services are not transferable to any other station.

Before handing over the charge, the Head of Institution is once again directed to check their documents, and if they have not acquired the relevant qualification as per rules, they may not be allowed to take over the charge against SST post.

The appointees shall take nine (09) Months mandatory training at RPDC/DPD.

**(Hafiz Dr. Muhammad Ibrahim)**  
**DIRECTOR**


**Elementary & Secondary Education**  
**Khyber Pakhtunkhwa, Peshawar**

/F.No. 01/SSTs Contract Apptt; (Male)/2021

Dated Peshawar the 17/03/2022

Copy of the above is forwarded to the:-

- Accountant General Khyber Pakhtunkhwa, Peshawar.
- District Education Officer Orakzai.
- District Accounts Officer Orakzai.
- To the Secretary to Govt. of Khyber Pakhtunkhwa, Elementary & Secondary Education Department.
- To Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- For file.
- For file.

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

at the  
South  
rather  
t the

at th  
Sout  
furth  
the po

d at t  
Sou  
furth  
ast 1

(16)

\* F U

To,

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

**Subject: DEPARTMENTAL APPEAL FOR ALLOWING THE APPLICANT TO RE-JOIN (RETAIN LIEN) ON HIS PREVIOUS POST OF CERTIFIED TEACHER (BPS-15).**

Respected Sir,

*Brief facts of the present departmental appeal are as under:-*

- 1- That the applicant was initially appointed against the post of Certified Teacher (BPS-15) vide endorsement No. 6043-53, dated 07.11.2020. That after appointment the applicant took over the charge against the same post at GHS Jalaka Mela, District Orakzai and started performing his duty quite efficiently and upto the entire satisfaction of his superiors.
- 2- That the applicant while performing his duty as CT (BPS-15) the respondent Department advertised several posts in the newspaper for initial appointment including the post of SST (Physics/Maths). That the applicant having the required qualification and eligibility applied for the post of SST (Physics/Maths) through proper channel and after fulfilling all the formalities was recommended for the post of SST (BPS-16) the applicant was appointed vide Notification dated 29.10.2021.
- 3- That after appointment the applicant was adjusted at GHSS And Khel, District Orakzai vide adjustment order endorsement No. 9430-44 dated 04.11.2021. That the applicant properly started performing his duty at the concerned station with devotion and with all zeal and zest and as such the applicant also submitted application for lien against the post of CT (BPS-15) before the authority concerned.
- 4- That during verification of the degree acquired from the Islamic University of Pakistan Sialkot found an unrecognized one and due to that reason appointment Notification 29.10.2021 of the applicant against the post of SST (BPS-16) has been withdrawn by the authority concerned.

- 5- That it is pertinent to mention that appointment of the applicant against the post of SST (BPS-16) has been withdrawn during the probation period and in light of FR-14(A) the applicant is fully entitle for retention of lien on the his previous post of i.e. Certified Teacher (BPS-15) with all back benefits.

It is, therefore, most humbly prayed that on acceptance of this Departmental appeal the applicant may very kindly be allowed to rejoin (retain lien) on his previous post in light of Fundamental Rule-14(A) with

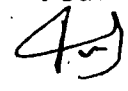
6024  
No. 26/77  
DATE

17

all back benefits. Any other relief which your good self deems appropriate may also be awarded in favor of the applicant.

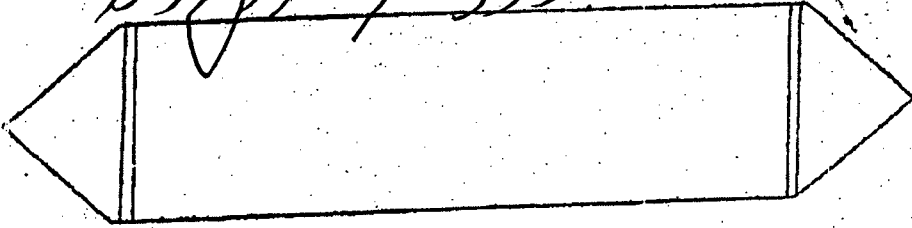
Dated: 5/7/22

Yours obediently



MUSSADDIQ ABBAS, CT (BPS-15),  
GHS Jalaka Mela, Orakzai.

بعد التخصیص نحو خواہشمند ہیں



موردہ  
مقدمہ  
دعویٰ  
جرم

2 پنجاب  
حصہ و سبب بنام  
Kamran Khan AHC  
BC-14-4781

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی دکن کاروائی متعلقہ  
آن مقام پر کسے گا مہر کی طرف سے مہر کا حق اور دیگر امور کے لئے  
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کمال اختیار ہوگا۔ نیز  
دیکل صاحب کو راضی نامہ کرنے و تقریر ثالثہ فیصلہ برحلف دینے جواب دہی اور اقبال دعویٰ اور  
بمسورت ڈگری کرنے اجراء اور مسولی چیک و روپیہ اور عرضی دعویٰ اور درخواست ہر قسم کی تصدیق  
ذرا میں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برآمدگی اور مشورتی  
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بسورت ضرورت مقدمہ مذکور  
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار  
ہوگا۔ اور صاحب مقرر شدہ کو ہمیشہ وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا ساتھ  
پر داخستہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانبہ التوائے مقدمہ کے سبب سے ہوگا۔  
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی  
کو کوڑ کریں۔ لہذا اذکالت نامہ لکھ دیا کہ سند ہے۔

المترجم

واہ العیہ

کے لئے منظور ہے۔

Attorney & Applicant

Dea Dine

بمقام  
Applicant