

16.06.2022

Appellant present through counsel.

Muhammad Adeel Butt, learned Additional Advocate General for respondents present.

Request for adjournment was made by the learned counsel for appellant in order to prepare the brief. Adjourned. To come up for arguments on 17.08.2022 before D.B at Camp Court, Abbottabad.



(Fareeha Paul)
Member (E)
Camp Court, A/Abad



(Rozina Rehman)
Member (J)
Camp Court, A/Abad

19th Oct., 2022

Nemo for the appellant. Mr. Kabirullah Khattak, Addl. AG for the respondents present.

This case pertains to Abbottabad and because of cancellation of tour the matter was fixed for arguments on 19.10.2022 at the Principal Seat. Because of cancellation of tour, the parties and their learned counsel might not have appeared. Notice be issued to appellant and his counsel for the next date. To come up for arguments on 16.11.2022, before ~~the D.B at Camp Court Abbottabad~~



(Fareeha Paul)
Member (E)

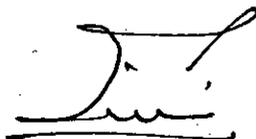


(Kalim Arshad Khan)
Chairman

20.12.2021

Learned counsel for the appellant present. Syed Naseer-ud-Din, Assistant and Mr. Sohail Ahmed Zeb, Litigation Officer alongwith Mr. Riaz Ahmed Paindakhel, Assistant Advocate General for the respondents present.

Joint para-wise reply on behalf of respondents submitted, which is placed on file and copy of the same is handed over to learned counsel for the appellant. Adjournd. To come up for rejoinder, if any, as well as arguments on 17.02.2022 before the D.B at Camp Court Abbottabad.



(Salah-Ud-Din)

Member (J)
Camp Court Abbottabad

17.02.2022

Due to non-functional of the Tribunal, the case is adjourned for the same on 19.05.2022.



Reader

19.05.2022

None for the appellant present. Syed Naseer Ud Din, Assistant Advocate General for respondents present.

Previous date was changed through Reader note, therefore, notice for prosecution of appeal be issued to the appellant and his counsel. To come up for arguments before D.B on 16.06.2022 at camp court Abbottabad.



(Fareeha Paul)
Member(E)



(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad

19.02.2021

Appellant present through counsel.

Preliminary arguments heard. File perused.

Points raised need consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days.

Appellant Deposited Security & Process Fee

Thereafter notices be issued to respondents for written reply/comments. To come up for written reply/comments on

17.06.2021 before S.B at Camp Court, Abbottabad.

(Rozina Rehman)
Member(J)
Camp Court, A/Abad

11.10.2021

Appellant in person and Mr. Muhammad Adeel Butt, Addl AG alongwith Sohail Ahmad Zaib, Litigation Officer for the respondents present.

Written reply/comments of the respondents is still awaited. Respondents are given last opportunity for submission of written reply/comments on next date, if they fail to submit reply on next date, their right for submission of reply/comments shall be deemed as struck off. Case to come up on 20.12.2021 before the S.B at camp court, Abbottabad.

Chairman
Camp Court, A/Abad

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 1958 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	17/03/2020	<p>The appeal of Mr. Ghulam Nabi received today by post through Mr. Muhammad Liaqat Advocate may be entered in the Institution Register and put up to the Learned Member for proper order please.</p> <p><i>[Signature]</i> REGISTRAR - 17/3/2020.</p>
2-		<p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>20-11-20</u></p> <p><i>[Signature]</i> Chairman</p>
20.11.2020		<p>Neither appellant nor anyone else representing him has appeared despite having been called time and again, therefore, appellant as well as his respective counsel be noticed for 19.02.2021 on which date file to come up for preliminary hearing before S.B at Camp Court, Abbottabad.</p> <p>(MUHAMMAD JAMAL KHAN) MEMBER CAMP COURT ABBOTTABAD</p>

BEFORE THE HONOURABLE SERVICE TRIBUNAL PESHAWAR CAMP
COURT ABBOTTABAD

Appeal No. 1958/2020

Ghulam Nabi

...PETITIONER

VERSUS

Government of KPK & others

...RESPONDENTS

SERVICE APPEAL

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...APPELLANT

Through:

Dated:- 12/03 /2020


(MUHAMMAD LIAQAT)
Advocate High Court, Abbottabad.

BEFORE THE HONOURABLE SERVICE TRIBUNAL PESHAWAR CAMP
COURT ABBOTTABAD

Appeal No. 1958/2020

Ghulam Nabi S/o Ajab Khan (EX SST) GHSS Harnoo R/o Nawan Sher
 Tehsil and District Abbottabad.

...APPELLANT

V E R S U S

1. Government of KPK through Sectary Elementary and Secondary Education Peshawar.
2. Director Elementary and Secondary Education Peshawar.
3. Accountant General KPK Peshawar.
4. Account Office Abbottabad.
5. District Education Officer (Male) Abbottabad.

Khyber Pakhtukhwa
 Service Tribunal

Diary No. 2141

Dated 17/3/2020

...RESPONDENTS

APPEAL U/S 4 OF ~~Service Tribunal~~ ACT
 1973 AGAINST THE NOTIFICATION NO. SO(SM)
 SED /2-1/2018 DATED 24.05.2018 WERE BY
 RESPONDENTS MALAFIDLY PROMOTED THE
 APPELLANT AFTER THE RETIREMENT DUE TO
 WHICH APPELLANT WAS DEPRIVED FROM 2
 INCREMENTS OF REGULAR POST OF SS AND
 BENEFITS TWO INCREMENTS IN BPS 16 TO
 BPS 17 FROM 17.03.2016 WHEREBY JUNIOR
 TEACHER WERE PROMOTED WHILE
 APPELLANT WAS NOT PROMOTED HENCE
 APPELLANT ENTITLED FOR PROMOTION FROM

Filed to-day

Registrar

17/3/2020

17.03.2016 AND BENEFIT OF PROMOTION OF
REGULAR POST OF SS AND BENEFIT /
ARREARS OF TO INCREMENTS DENIAL OF
RESPONDENTS IS ILLEGAL ARBITRARY
AGAINST THE LAW.

PRAYER:-

ON ACCEPTANCE OF INSTANT
APPEAL, RESPONDENT MAY PLEASE BE
DIRECTED TO GIVE TWO INCREMENTS OF
REGULAR POST OF SS AND BENEFITS
/ARREARS OF TWO INCREMENT FROM
17.03.2016 WHERE BY JUNIOR TEACHERS
WERE PROMOTED AND APPELLANT WAS NOT
PROMOTED DUE TO MALAFIDLY INTENTION
AND FALSE AND FABRICATED INQUIRY.

Respectfully Sheweth,

1. That appellant was appointed on 18-09-1985⁸⁵ as
CT/ SV and Retired on 06-04-2018 on
superannuation. (Copy of the appointment
order is attached as Annexure "A")

2. That appellant was promoted in BPS 16 to 17 through office order No So (PE)2-6 /E & S /up gradation /SET on 27.09.2008 but due to non-availability of post of SS Appellant was working in the post of SET **(Copy of Notification is attached as Annexure "B")**

3. That on 17.03.2016 respondents issued Notification for promotion of SET BPS 16 to SS, BPS 17 in which appellant was Deprived From promotion due to a false inquiry where appellant was censure **(Copy of Notification and order of censure is attached as Annexure "C" & "D" respectively)**

4. That appellant file an appeal against the order Dated 24.07.2017 of respondent No.1 **(Copy of the appeal is attached as Annexure "E")**

5. That on 17.03.2016 respondent issue a promotion list through notification No So PE 2-6 DPC meeting /SST-SS) 17.03.2016 where appellant was not promoted while junior officer were promoted **(Copy of Notification is attached "E")**

6. That being aggrieved appellant file an appeal to respondent No.2 on 11.05.2016 which was not decided by the competent authority **(Copy of the appeal is attached as Annexure "G")**

7. That respondent No.1 issue impugned Notification where appellant was promoted after the retirement due to which appellant was deprive from two increments and Benefits / areas of to increment due to retirement **(Copy of Notification is attached as Annexure "H")**

8. That appellant file an appeal to respondents for the Benefits of two increments which is still pending before competent authority and not decided till now **(Copy of Appeal is attached as Annexure "I")**

9. That when the appeal of appellant was not decided by the competent authority, appellant file an other appeal to ombudsman on 27.04.2019 **(Copy is attached as Annexure "J")**

10. That provincial ombudsman decided the appeal of the appellant by given direction that appellant seek remedy from competent forum before this honourable tribunal (Copy of order is attached as Annexure "K")

11. That appellant being aggrieved from the impunge notification file instant appeal before this Honourable Tribunal inter alia on the following grounds.
GROUND:-

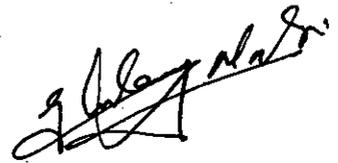
- a) That according to impugned Notification appellant is entitled for two increments of regular post of SS and Benefit / arrear of two increments hence appellant is entitled for two increments, of regular post of SS benefit / arrear and Revision in pension.
- b) That appellant was illegible for promotion on 17.03.2016 but respondents malafidly not promoted the appellant only to Deprive the appellant form regular post of SS and two increments and benefits /arrears hence appellant is entitled for two increments and Benefits /arrears of two increments.
- c) That appellant was Deprive from regular BPS 17 which is legal right of the appellant hence impugned Notification is liable to be set-aside

and appellant is entitled for Regular post of SS and also is entitled for arrear of two increments from 17.03.2016

- d) That respondent No.5 /DEO (Male) Abbottabad not show any reason due to which appellant was deprive for regular BPS 17 and arrear hence appellant is entitled for regular post of SS and arrear From 17. 3.2016.
- e) That respondents malafidly promoted to appellant after his retirement and give the monitory loss to appellant. Hence impugned notification liable to be set aside and appellant is entitled for benefits /arrears from 17.03.2016.
- f) That act of the respondent are against the article 4. of the constitution of Pakistan 1973 hence impugned Notification is liable to be set aside and appellant is entitled for regular BPS 17 and arrear.
- g) That the instant appeal is monitory in nature hence limitation is not attracted, otherwise if the honourable tribunal presume that the instant appeal is time bard. Appellant has a

right to file application for condonation of delay.

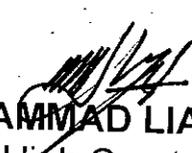
It is, therefore, humbly prayed that on acceptance of the instant appeal appellant may please be granted regular BPS 17, with two increments and Benefit /arrear from 17.03.2016 till retirement, and Revision in pension any other relief which this honourable tribunal deem fit and proper may please be granted to the appellant.



...APPELLANT

Through:

Dated:- 12/3 /2020



(MUHAMMAD LIAQAT)
Advocate High Court, Abbottabad.

VERIFICATION:-

*Verified that the contents of the instant **Appeal** are true and correct to the best of my knowledge and belief and that nothing material has been suppressed from this Honorable Court.*

Dated:- 12/03 /2020



...APPELLANT

**BEFORE THE HONOURABLE SERVICE TRIBUNAL PESHAWAR CAMP
COURT ABBOTTABAD**

Appeal No. /2020

Ghulam Nabi

...PETITIONER

V E R S U S

Government of KPK & others

...RESPONDENTS

SERVICE APPEAL

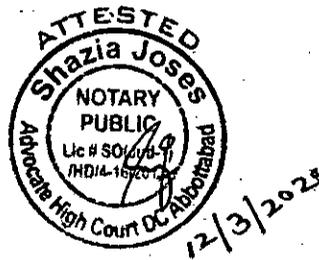
AFFIDAVIT

I, Ghulam Nabi S/o Ajab Khan (EX SST) GHSS Harnoo R/o Nawan Sher Tehsil and District Abbottabad, *Appellant*, do hereby solemnly affirm and declare on Oath that the contents of instant *Appeal* are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Court.

Dated:- 12/3 /2020


...DEPONENT

IDENTIFIED BY:-




(MUHAMMAD LIAQAT)
Advocate High Court,
Abbottabad.

BEFORE THE HONOURABLE SERVICE TRIBUNAL PESHAWAR CAMP
COURT ABBOTTABAD

Appeal No. /2020

Ghulam Nabi

...PETITIONER

VERSUS

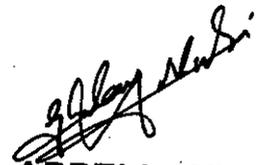
Government of KPK & others

...RESPONDENTS

SERVICE APPEAL

CERTIFICATE

***Certified that no such Regular First Appeal has earlier
been filed before this Hon'ble Court.***


...APPELLANT

Through:

Dated:- 12/03/2020


(MUHAMMAD LIAQAT)
Advocate High Court, Abbottabad.

BEFORE THE HONOURABLE SERVICE TRIBUNAL PESHAWAR CAMP
COURT ABBOTTABAD

Appeal No. 12020

Ghulam Nabi

...PETITIONER

V E R S U S

Government of KPK & others

...RESPONDENTS

SERVICE APPEAL

ADDRESSES OF THE PARTIES

Respectfully Sheweth,

The addresses of the parties are as under;

APPELLANT:

Ghulam Nabi S/o Ajab Khan (EX SST) GHSS Harnoo R/o Nawan Sher
 Tehsil and District Abbottabad.

RESPONDENTS:

1. Government of KPK through Sectary Elementary and Secondary Education Peshawar.
2. Director Elementary and Secondary Education Peshawar.
3. Accountant General KPK Peshawar.
4. Account Office Abbottabad.
5. District Education Officer (Male) Abbottabad.


 ...APPELLANT

Through:

Dated: - 12/03 /2020


 (MUHAMMAD LIAQAT)
 Advocate High Court, Abbottabad.

BEFORE THE HONOURABLE SERVICE TRIBUNAL PESHAWAR CAMP
COURT ABBOTTABAD

Appeal No. /2020

Ghulam Nabi

...PETITIONER

VERSUS

Government of KPK & Others

...RESPONDENTS

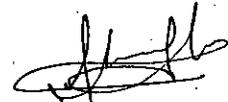
SERVICE APPEAL

APPLICATION FOR CONDONATION OF DELAY, IF ANY, IN
FILLING THE INSTANT SERVICE APPEAL IS TIME BARD

Respectfully Sheweth,

1. That, the titled case is being filed before this Honourable Court.
2. That, the respondent /competent authority have not decided the appeal of the appellant. Appellant file representation before provisional ombudsman which was decided by given direction to file appeal before this honourable tribunal due to above reasons which appeal being file with delay.
3. That, is the settled principal of law a time which is expend in wrong forum for the end of justice be condom.
4. That the delay was not intentionally but due to seek remedy from a wrong forum and present appeal minority loss is inviolate, Hence limitation could not run against minority matters..

It is, therefore, humbly prayed that on acceptance of foregoing application, any delay if so caused, may graciously be condoned and the case of the applicant be decided on merits, for end of justice.


 ...PETITIONER

Through:

Dated:- 12/03/2020

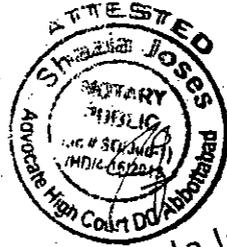

 (MUHAMMAD LIAQAT)
 Advocate High Court, Abbottabad.

AFFIDAVIT:

19

I, Ghulam Nabi S/o Ajab Khan (EX SST) GHSS Harnoo R/o Nawan Sher Tehsil and District Abbottabad, *petitioner*, do hereby solemnly affirm and declare on Oath that the contents of instant *application* are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Court.

Dated:- 12/03/2020




...PETITIONER

IDENTIFIED BY:-


(MUHAMMAD LIAQAT)
Advocate High Court,
Abbottabad.

...DEPONENT

OFFICE OF THE DIRECTOR OF EDUCATION (SCHOOLS) HAZARA DIVN: A.ABAD.

APPOINTMENTS.

OFFICE ORDER NO. 77/CT
DATED A.ABAD THE 18.9/85Annex
"A"

The following appointments against vacant CT/SV posts @ Rs.

520/-p.m.fixed plus usual allowances etc. are hereby ordered in the interest of public service with effect from the date of their taking over charge:-

S.No.	Name and Address	Name of school where appointed.	Remarks.
1.	Ghulam Nabi, BA s/o Mohammad Ajab Khan V&IO Nawanshehr A/Abad.	GHS Namli Maira	Agst: vacant SV post.
2.	Qari Abdur Rehman, BA s/o Haji Said Mohammad Khan Vill: Kalah Battagram	GHS Paimal Sharif	----do-----
3.	Mohammad Rafiq, BA s/o Abdul Ghani Vill: Khushala Mansehra.	GHS Attar Shisha	----do-----
4.	Allah Dad, BA s/o Shahzullah Khan Kunj Jadeed Abbottabad.	GHS No.3.(Sect:) K.T. Ship.	Agst: vacant SV Post.
5.	Masudur Rehman, BA S/Asstt: Govt: Politechnique Institute	G.M.S. Sirraya	----do-----
6.	Taj Mohammad DA s/o Mohammad Ayub Khan c/o Capt: Retd: Sultan Mohammad Vill: Bazar Gai Oghi Mansehra.	G.M.S. Pattan Kalan	Agst: vacant CT Post.
7.	Shahid Hafeez, BA s/o Ghulam Jelani Vill: & PO Sarae Saleh Haripur.	G.M.S. Aluli	Agst; vacant SV Post.
8.	Sher Afzal FA s/o Ajab Khan Vill; Ghumawan Nawanshehr Abbottabad.	G.M.S. Ghumawan	----do-----
9.	Sohail Abdul Nasar, BA s/o Ihsan Zaffar Mohallah Azam Khan Havelian	G.M.S. Aluli	----do-----
10.	Abdul Hakim s/o Abdul Laif, DA Mohallah Masjid Noor Sarae Saleh. Haripur.	G.H.S. Jab	----do-----
11.	Mohammad Amraiz BA s/o Khani Zaman c/o Aurangzeb, UBL Zonal Office A/Abad.	G.M.S. Dail	----do-----
12.	Zahid Hussain BA s/o Mohammad Yousaf Khan V&IO SheikhalBandi A/Abad.	G.M.S. Dartian	----do-----
13.	Noor Mohammad DA s/o Sardar Bahadur Khan Sect: No.4.K.T. Ship H.Fur.	G.M.S. Kotla	----do-----
14.	Qamrul Haq, DA s/o Ghulam Sarwar 62- Kekul Road A/Abad.	G.M.S. Khoi Nara	----do-----
15.	Mohammad Shamraiz Abassi s/o Fazal Dad Vill: Khushikote PO. Khairagali	G.H.S. Khanaspur	----do-----
16.	Mahboob Khan DA s/o Mohammad Ayub Vill: Paswal PO. S.N. KHAN ATD.	G.H.S. Beer	Agst; vacant CT Post.
17.	Shahid Hussain BA s/o Bashir Ahmad c/o Anis Ahmad PSI Military Court A/Abad.	G.M.S. Kot Ora	----do-----
18.	Shaukat Ali, BA s/o Allah Dad Khan Abassi c/o H.M. GHS Dalola.	G.H.S. Pattan Khurd	----do-----
19.	Mohammad Farooq, BA s/o Haji Mohammad Haroon Vill: Shinjari Mansehra.	G.H.S. Koghan	----do-----
20.	Mohammad Latif, DA s/o Mohammad Rafiq Khan V&IO LabarKote Mansehra.	G.M.S. Mohar	----do-----
21.	Jahanzeb Khan BA s/o Biland Khan Dab No.2. Mansehra.	G.H.S. Kriplian	Agst; vacant SV Post.

Contd: on next page....

"A" XIAA

Science Teacher.

Page No..2.....

- 1. Khalid Waheem, BSE s/o. GHS Namli Maira Agst; vacant SV Post
Mohammad Aslam Vill: Ochhar P.O. Nawanshehr.
- 2. Tariq Parvez Bhatti FSc s/o GHS Chhajian Agst; vacant CT Post.
Inayatullah Bhati. H.NO. 1706 Police Line A/Abad.
- 3. Amjad Ali, FSc s/o Ali Sarwar GHS Bhadhora Agst: vacant SV Post.
Hussain Vill: Sian Da Katha P.O. Public School A/Abad.

@@@@@@@@

10. INSTRUCTIONS.

1. Charge reports should be sent to all concerned.
2. No TA/DA etc is allowed on fresh appointment.
3. The appointment of Cdts: is purely on temporary basis and liable to termination at any time without notice or reason.
4. The Candidates are required to produce their age and Health Certificate from the Medical Supdt: concerned and no pay etc shall be drawn untill and unless they produce the above Certificate from the said officer.
5. The Head of Institutions are required to check original Educational Qualification Certificates of the CDTS before handing over charge to them.
6. In case the candidate fails to take over charge within 15 days of the issue of this order his appointment shall stand automatically cancelled.
7. In case they/he wish to resign from service they/he shall have to give one month prior notice or forfeit one month pay in lieu of notice.
8. The Candidates should not be handed over the charge if their/his age below 18 years or above 30 years.
9. The Verification Roll of Character and antecedent duly verified by the Police authority should be sent to this office.

(MOHAMMAD AYYUB KHAN JADOON)
DIRECTOR OF EDUCATION(S)
HAZARA DIVN: ABBOTTABAD.

Order No. 15632-15687 A.E. III Dated Abbottabad the 18.9.1985,
Copy to :-

- 1-2. The D.E.O.(M) Abbottabad & Manshra.
- 3-5. The S.D.E.O.(M) Abbottabad and Haripur.
- 6-10. The Headmasters GHS Namli Maira, Paimal Sharif, Attarshisha, No.3 Sector K.T. Ship Haripur, Jab, Khanaspur,, Beer, Pattan Khurd, Kaghan Kriplian, Chhajian and Bhadhora.
- 11-29. The Headmaster GHS Sirrya, Pattan Kalan, Aluli, Ghumawan, Dail, Dartian, Kotla, Khoi Nara, Kundi, Mohar
- 30-53. All concerned fro. Sr. No.1 to 24
54. V AE, Local Directorate.
55. ADE Local Directorate.
56. O.O. File.

Gurhan - 17/9/85
FOR/ DIRECTOR OF EDUCATION(S)
HAZARA DIVN: A.ABAD.

Ch



GOVERNMENT OF NWFP
FINANCE DEPARTMENT

(REGULATION WING)

Dated Peshawar, the 26th January, 2008.

Annex B

14

NOTIFICATION

NO.FD/SO(FR)10-22/2007. In supercession of this Department's letter No.SO(FR)10-22(B)/2005 dated 01-10-2007 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 upgradation 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	Upgraded Scale
1	Primary School Teacher (PST) (BPS-07).	FA/FSc and are trained teachers	BPS-09 (one time only)
2	Primary School Teacher (PST) with requisite experience renamed 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. Upgradation to the post shall be made through DPC as per laid down procedure.	BPS-17
5	Qari/Qaria (BPS-07)	Hafiz Quran with SSC	BPS-12

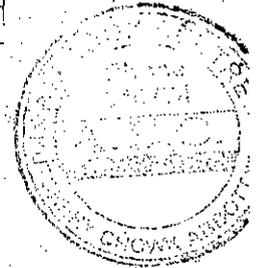
SECRETARY TO GOVT. OF NWFP
FINANCE DEPARTMENT

Endst No. & Date even.

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

- 1) All the Secretaries in NWFP, Peshawar.
- 2) All the DCOs/EDOs Schools & Literacy Department, NWFP.
- 3) Accountant General, NWFP, Peshawar.
- 4) Director Schools & Literacy NWFP, Peshawar.
- 5) Director of Education FATA NWFP, Peshawar.
- 6) PSO to Chief Minister, NWFP.
- 7) PSO to Chief Secretary, NWFP.
- 8) PS to Secretary Finance Department, NWFP.
- 9) All District/Agency Accounts Officers in NWFP.

0333-5079597
03458990572
(NAIB KHAN)
SECTION OFFICER (FR)



AJAZ AHMAD
Baeha Mardan

15

GOVERNMENT OF NWFP
ELEMENTARY & SECONDARY
EDUCATION DEPARTMENT

Dated Peshawar the 27-09-2008

NOTIFICATION

No. SO(PE)2-6/E&S/Upgradation/SET: The competent authority on the recommendation of Departmental Promotion Committee and in consultation with Finance Department is pleased to allow one time up-gradation from B-16 to B-17 (Personal) to the following 2333 SET's Male, 446 SET's Female, 23SET's (Technical) and 02 SET's (Commerce) B-16 with immediate effect subject to the condition that the posts of SET shall be downgraded from B-17 to B-16 as and when vacated by the incumbents.

S.#	Name of Officer	Date of Appointment as Regular SET	Present Place of Posting
1	Khairullah Khan	1-11-86	GCMHS Peshawar Cantt.
2	Furid Nawaz Khan	2-11-86	ADO Bannu
3	Haidar Ali	5-16-86	GHS Tattar Khel Karak
4	Fazal Muhammadd	5-11-86	GMS Purana Hoti Mardan
5	Iqbal Hussain	6-11-86	GHS Jehangira Swabi
6	Abdur Rashid	15-12-86	GHS Mitha Khel Karak
7	Abdul Aziz	8-11-86	GMS Baikhan Mardan
8	Muhammad Ibrahim	11-11-86	GHS Julagram MKD
9	Abdul Sattar	11-11-86	GCMS ATD
10	Muhammad Daud	11-11-86	GHSS Spin Kai SWA
11	Mushtaqur Rahman	12-11-86	GHS Badwan DIR
12	Aurangzeb	12-11-86	GHSS Darra Peizu Lakki
13	Saeedullah	13-11-86	GMS Ushairai Dara Dir (U)
14	Muhammad Nazir	13-11-86	GHSS Khanpur Dir(L)
15	Sadiq Jan	14-11-86	ADO (M) Dir (U)
16	Gul zarif	15-11-86	GHS wardaga CHD
17	Ahmad Khalil	18-11-86	GHS Shawa DIR (L)
18	Shahir-ud-Din	20-11-86	GMS Akram Abad MKD
19	Ali Akbar	22-11-86	GHS Totalai Bunir
20	Muhammad Yunis	23-11-86	ADO (E&S) Batagram
21	Hidayatul Haq	1-12-86	GHS Satti Abad CHD

02 SET'S COMMERCE

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S.#	Name of Officer	Date of Appointment as Regular SET	Present Place of Posting
1.	Kiramat Ullah	31-08-83	GHS No.2 DI Khan
2.	Fazl-e- Zaman	31-08-83	SET Commerce GHS Sikhakot No:1 MKD

Secretary to Govt of NWFP
Elementary & Secondary Education Department
NWFP

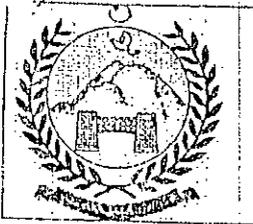
Endst. No. SO(PE)/E&SE/2-6/Upgradation SET

Dated 27-09-2008

Copy forwarded to the:-

1. The Accountant General NWFP, Peshawar.
2. Secretary to Govt of NWFP, Establishment Department.
3. Special Secretary (Regulation) Establishment & Administration Department, Peshawar.
4. Secretary to Govt of NWFP. Finance Department NWFP. Peshawar.
5. Director Elementary & Secondary Education NWFP, Peshawar.
6. Director Curriculum & Teacher Education NWFP, Abbottabad.
7. Director PITE Peshawar.
8. Director Education FATA. NWFP.
9. All the EDOs E&SE in NWFP.
10. All the District /Agency/Account Officer in NWFP.
11. PS to Chief Secretary NWFP.
12. Officers Concerned.
13. PS to Minister for Education (Elementary & Secondary) NWFP.
14. PS to Secretary Elementary & Secondary Education Department NWFP.
15. Office Order File.


(MUHAMMAD AYUB KHAN)
SECTION OFFICER (PRIMARY)



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Dated Peshawar the 17-03-2016

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Annex "C"

NOTIFICATION

Nq.SO(PE)/2-6/DPCMeeting/SST-SS (20/10/2015): On the recommendations of the Departmental Promotion Committee, the Competent Authority is pleased to promote the following Seven Hundred and Thirty Seven (737) Male SSTs (BS-16) to the post of Subject Specialist (BS-17) on regular basis with immediate effect:-

S#	SH in Subject	SLN	Name and Qualification	Present school Address	Proposed Station	Remarks
1	1	746	Sikandar Khan	GHS Pakha Ghulam Peshawar	SS B-17 (Biology) GHS Tehkal Bala Peshawar	Against vacant post
2	2	1370	Zeenat Ullah SET MSc BEd	GHS Mitha Khel Karak	SS B-17 (Biology) GHSS Dabli Lawaghar Peshawar	Against vacant post
3	3	1813	Mr Sultan Ferooq, SET	GHS Sarwar Jan Bala Khel FR Bannu	Services placed at the disposal of Director Education FATA	Against vacant post
4	4	1871	Mr Akhtar Nawaz Khan MSc M.Ed	GCMPS Turbela Township Haripur	SS B-17 (Biology) GHSS Jatti Pind, Haripur	Against vacant post
5	5	2751	Mr. Muhammad Fayaz Shah SET	GHS Rashakai Nowshera	SS B-17 (Biology) GHSS Rashakai, Nowshera	Against vacant post
6	6	2768	Mr. Yousaf Zaman, SET	GHS Jan Killa Bannu	SS B-17 (Biology) GHSS Nari Panoos, Karak	Against vacant post
7	7	2775	Mr. Bakht Baidar, SER	GHSS Barikot Swat	SS B-17 (Biology) GHSS Kishawra, Swat	Against vacant post
8	8	2799	Mr. Janat Gul, SET	GHSS Khanpur Dir Lower	SS B-17 (Biology) GHSS Asban Dir Lower	Against vacant post
9	9	2894	Mr. Bakht Ali Shah, SET	GHSS Serai Nauang Lakki	SS B-17 (Biology) GHSS Abdul Kjel, Lakki	Against vacant post
10	10	2965	Muhammad Altaf ur Rehman SET MSc BEd	GHS Dhindha Haripur	SS B-17 (Biology) GHSS Beer Haripur	Against vacant post
11	11	3063	Bukhar Ali Shah S/O Zardad Khan MSc MEd Bannu	GHS Tour Bura Khel Bannu	SS B-17 (Biology) GHS Chorlaki, Kohat	Against vacant post
12	12	3302	Aamir Alam Khan S/O Gul Muhammad Dir MSc BEd	GHS Hathian Mardan	SS B-17 (Biology) GHSS Pir Saddi Mardan	Against vacant post
13	13	3458	Fazli Subhan s/o Gul Khan MSc MEd	GHS Tall Swat	SS B-17 (Biology) GHSS Tall Swat	Against vacant post
14	14	4138	Syed Asif Hussain Shah SET MA B.Ed	GHS Talhatta, Manselara	SS B-17 (Biology) GHSS Doga, Manselara	Against vacant post
15	15	4554	Sajid Hussain SET BA/B.Ed	GHS Chakarkot Kot Bala Kohat	SS B-17 (Biology) GHSS Landi Kachi, Kohat	Against vacant post
16	16	4558	Mehjoob Alam SET M.Sc/M.Ed	GHS Kot Kashmir Lakki	SS B-17 (Biology) GHSS Shahbaz Khel Laki Marwat	Against vacant post
17	1	520	Nasrullah BA BEd	GHS Mandawa Karak	SS B-17 (Chemistry) GHSS Kandu Khel Karak	Against vacant post
18	2	534	Liaqat ali MSC BEd	GHS Khazana Dheri Mardan	SS B-17 (Chemistry) GHSS Mahabat Abad, Mardan	Against vacant post
19	3	564	Ihsanul Haq MSC BEd	GHS Shergarh Mardan	SS B-17 (Chemistry) GHSS Shergarh, Mardan	Against vacant post
20	4	569-A	Muhammad Iqbal SET MSc M.Ed	GHS Ouch, Dir Lower	SS B-17 (Chemistry) GHSS Chakdara, Dir Lower	Against vacant post
21	5	579	Zonrullah MSc BEd	GHS Soer Kamar, Jantud Khyber Agency	SS B-17 (Chemistry) GHSS Shah Saleem Karak	Against vacant post

Rasul Khan

						superannuation basis on 11.11.2015, while the DPC was held on 20.10.2015 thus he is promoted w.e.f. date of DPC, in light of Establishment Department Instructions SO(R-VI)E&AD1-16/2005 dated 22.03.2006
685	51	1192	Mr. Qazi Abdul Qayyum BA MEd	GHS Chatrar Plain Mansehra	SS B-17 (Islamiyat) GHSS Battal Mansehra	Against vacant post
686	52	1196	Mr. Sikandar Khan SET MA/B.Ed	GHS Mirpur Haripur	SS B-17 (Islamiyat) GHSS Serai Naimat Khan, Haripur	Against vacant post
687	53	1204	Mr. Tilawat Shah MA MEd	GHS Hayatabad Peshawar	SS B-17 (Islamiyat) GHSS Daag, Peshawar	Against vacant post
688	54	1249	Mr. Jan e Alam, MA, Bed	GHSS Kuza Banda Battagram	SS B-17 (Islamiyat) GHSS Kuza, Banda, Battagram	Against vacant post
689	55	1255	Mr. Sajid Hayat SET	GMS Sarband Mardan	SS B-17 (Islamiyat) GHSS Qasim(T) Mardan	Against vacant post
690	56	1265	Mr. Safaid Muhammad MA/B.Ed	GHS Paimal Sharif Battagram	SS B-17 (Islamiyat) GHSS Thakot Battagram	Against vacant post
691	57	1267	Mr. Irfan-ul-Haq SET MA/B.Ed	GMS Bandagai, Dir Upper	SS B-17 (Islamiyat) GHSS Gandigar, Dir Upper	Against vacant post
692	58	1270	Mr. Gul Khan BSC/B.Ed	GHS Oghi Mansehra	SS B-17 (Islamiyat) GHSS Gali Bidral, Mansehra	Against vacant post
693	59	1297	Mr. Ameer Muhammad	GHS Milha Khel Karak	SS B-17 (Islamiyat) GHSS Pabli Lawaghar, Karak	Against vacant post
694	60	1298	Mr. Haleem Gul s/o Fazli Hadi SET BA, MEd	GHS No.1 Thana Malakand	SS B-17 (Islamiyat) GHSS Pacha Killi Dir Upper	Against vacant post
695	61	1347	Mr. Haroon Rashid MA MEd	GCMS No.2 Mardan	SS B-17 (Islamiyat) GHSS Goryala, Mardan	Against vacant post
696	62	1353	Mr. Abdur-Rauf BSC/B.Ed	GHS Shewa Swabi	SS B-17 (Islamiyat) GHSS Naranji, Swabi	Against vacant post
697	63	1379	Mr. Faizullah MA/B.Ed	GHSS Darban Kalan D.I.Khan	SS B-17 (Islamiyat) GHSS Chadwdwan, D.I.Khan	Against vacant post
698	64	1396	Mr. Muhammad Afzal MA/B.Ed	GHSS No.1 Paharpur D.I.Khan	SS B-17 (Islamiyat) GHSS Shorkot, D.I.Khan	Against vacant post
699	65	1427	Mr. Sher Rahman, SET. BA, Bed	GHS Jalbai, Swabi	SS B-17 (Islamiyat) GHSS Jalsai Swabi	Against vacant post
700	66	1436	Mr. Hussain Alamad MA/B.Ed	GHSS Shah Noor Pul, Takht Bhai, Mardan	SS B-17 (Islamiyat) GHSS Kishawra, Swat	Against vacant post
701	67	1583	Mr. Jansher Khan s/o Hakim Khan MA MEd	GHS No.2 Salim Khan Swabi	SS B-17 (Islamiyat) GHSS Salim Khan Swabi	Against vacant post
702	68	1587	Mr. Hamidullah s/o Hafiz M.Tahir SET MA/B.Ed	GCMHS No.2 Mardan	SS B-17 (Islamiyat) GHSS Chorarai Duner	Against vacant post
703	69	1588	Mr. Muhammad Ayub	GHS Bigwani Shoom, D.I.Khan	SS B-17 (Islamiyat) GHSS Paharpur No.1 D.I.Khan	Against vacant post
704	70	1594	Mr. Muhammad Jayed	GHS Kass Koroona Mardan	SS B-17 (Islamiyat) GHSS Naseer Killi Mardan	Against vacant post
705	71	1596	Mr. Munawar Khan SET MA/B.Ed	GHS Kair Dara Dir(Upper)	SS B-17 (Islamiyat) GHSS Akhagram Dir Upper	Against vacant post
706	72	1597	Mr. Bakht Biland Khan	GHS Swegali Swat	SS B-17 (Islamiyat) GHSS Deolai, Swat	Against vacant post
707	73	1627	Mr. Habibullah Jan MA MEd	GMS Hayatabad Peshawar	SS B-17 (Islamiyat) GHSS Pakha Ghulam, Peshawar	Against vacant post
708	74	1648	Hussain Gul SET	GHS Babuzai Mardan	SS B-17 (Islamiyat) GHSS Chaghar Matti Peshawar	Against vacant post

Rae Mha

DFE

Amex: D 27/6

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DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER
PAKHTUNKHWA, PESHAWAR

NOTIFICATION

1. WHEREAS, the District Education Officer (M) Abbottabad to propose disciplinary action against Mr. Ghulam Nabi SST GMS, Ghumawan District Abbottabad vide 10219 dated 15-12-2016, for the charges of submission of ACRs, Bio Data etc for promotion to Headmaster post with fake signature.
2. AND WHEREAS, the Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar to serve a show cause notice upon the said SST vide No. 4914-15 dated 30-12-2016.
3. AND WHEREAS, the District Education Officer (M) Abbottabad to send the reply of his show cause notice vide letter No. 966 dated 28-01-2017.
4. AND WHEREAS, the Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar to call him for personal hearing vide letter No. 2838 dated 09-02-2017.
5. AND WHEREAS, the competent authority having considered the evidence on record and given the opportunity of personal hearing to the accused SST is of the view that the charges leveled upon the said teacher have partially been proved upon him.
6. NOW THEREFORE, in exercise of powers conferred under the Government of Khyber Pakhtunkhwa, Government Servants (E&D) Rules, 2011, the minor penalty of "censure" is hereby imposed upon Mr. Ghulam Nabi SST GMS, Gumawan District Abbottabad.

DIRECTOR

Endst: No. 536-38 /F. No.45/SST (M) Complaint/Abbottabad.

Date Peshawar the 27/4/ 2017

Copy of the above is forwarded for information & n/action to the:-

1. District Education Officer (M) Abbottabad.
2. District Accounts Officer Abbottabad.
3. SST concerned.
4. PA to Director (E&SE) Khyber Pakhtunkhwa, Peshawar.
5. Master File.

Deputy Director (Estab)
Elementary & Secondary Education
Khyber Pakhtunkhwa

25/4/17

Annex "E"

(21)

To

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

SUBJECT

DEPARTMENTAL APPEAL AGAINST THE NOTIFICATION DATED 27/04/2017 ISSUED BY DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION DEPARTMENT KHYBER PAKHTUNKHWA, PESHAWAR WHICH IS RECEIVED BY APPELLANT ON 04/05/2017 AND THE SAME IS ISSUED UNDER ENDST NO 4536-38/F.NO.45/SST (M) COMPLAINT/ ABBOTTABAD, WHEREBY MINOR PENALTY OF "CENSURE" IS IMPOSED UPON APPELLANT IN THE MATTER/CASE OF FAKE/BOGUS SIGNATURES ON ACRS, SYNOPSIS, RESULT STATEMENT, AND NON INVOLVEMENT CERTIFICATE & BIO-DATA.

Respected Sir,

With due respect It is stated that appellant through under reference notification dated 27/04/2017 issued by Directorate of Elementary & Secondary Education Department Khyber Pakhtunkhwa Peshawar, imposed minor punishment/penalty of "Censure" in the cited subject matter which is given in detail herein below. (Copy enclosed)

- 1) In the previous general promotion of SSTs to the posts of (Subject Specialist) S.S on seniority basis, Appellant has not been promoted in his scheduled/regular seniority position while his juniors were promoted as SS.
- 2) That Appellant while preparing his Departmental Appeal submitted his documents for signatures & necessary completion to Principal GHS No 1 Abbottabad, through Mr Muhammad Saeed SST & Abdus Salam SST GHS No 1 Abbottabad because at that time Principal himself was not present in his office.
- 3) That so these documents were not signed in the presence of appellant & also not personally received by the appellant from the office of the Principal GHS No 1 Abbottabad, When the Learned Deputy District Officer (Male) Abbottabad while affixing his Counter signatures, asked appellant that these documents were signed by Principal GHS No 1 in my personal presence, the appellant on the spot replied that these documents were not signed in my personal presence, whereupon

office of the DEO (M) Abbottabad wrote a letter to Principal for verification of signatures, whereupon principal denied the under-questioned signatures.

- 4) That directorate of Elementary & Secondary Education Department Khyber Pakhtunkhwa Peshawar, after giving the opportunity of personal hearing and having considering the evidence available on the record, declared that the charges leveled upon appellant has partially been proved upon him and imposed minor punishment/penalty of "Censure" was imposed upon appellant, which is against law and facts as well out of available record on the following amongst other grounds.

Grounds

- a) That appellant admitted and stated in all forums that he was not involved in the matter of fake bogus signatures of Principal GHS No 1 Abbottabad, and same fact is clearly stated himself that these documents were not signed in the presence of appellant when Deputy DEO inquired about signatures, appellant always stated that both the teachers can point out the whole position of the case/matters that who signed the documents ? and who stamped the same ?, while it is absolutely proved that the present working stamp of Principal GHS No 1 is being used in under-questioned signatures.
- b) That as the matter of ACRs it is the sole duty of controlling officer (Principal) to prepare and submit it to higher authority in the month of December of every year and these documents (Annual Confidential Report) would be considered in any type of promotion cases of concerned person and due to this settled principle of prescribed rule, and handed over of these documents for DPC were never ever responsibility of appellant in his promotion case, but the same is the job of controlling or higher authority.
- c) That there is no adverse remarks in any of his previous ACR or any misconduct on the part of appellant is available as there was no danger of any adverse remarks in ACRs, thus there was no chance of any adverse entries in ACRs as copies of

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previous ACRs are available in the record of Appellant, no problem in the ACRs signatures for the appellant, similarly in his whole service there is no single ACR is available with any minor adverse remarks.

- d) That factually & legally, applicant has never exercised any act of omission or commission in the whole prevailing matter, the instant departmental appeal is being filed within one month after receiving the impugned order dated 27/04/2017 through post.
- e) That there are many flaws available in the inquiry, inquiry officer did not weight the statement of Mr Shakeel TT who received the documents and handed over to dealing clerk, similarly inquiry officer should have taken signature specimen/hand writing of appellant, along with Mr Abdus Salam SST & Mr M Saeed SST and would sent these with under question documents to hand writing expert (FSL Peshawar) for expert opinion, similarly there is no on oath statement taken by I.O, but these very defective proceedings legally leads to be required to close the matter against the appellant.

In the light of the above position of the case it is hoped and requested that case may kindly be filed and closed without any minor penalty.

Yours Sincerely

Dated 29/05/2017

Ghulam Nabi
SST Government Middle School
Ghumawan Abbottaabad.

Annex "G1"

(24)

To

(2)
The Chief Secretary
Govt. of KPK
Elementary & Secondary Education Deptt, Peshawar.

Subject: - APPEAL FOR APPOINTMENT/ PROMOTION AGAINST S.S POST

Through Proper Channel

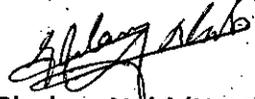
With the humble submission I dare to bring in your kind notice that my promotion to the post of subject specialist could not be ordered due to some unknown reason in the notification issued vide So (PE)/2-6/D.P.C meeting SST-SS (20-10-2015) issued on 17-03-2016.

My name falls in the seniority list at S. No 1512 (photocopy attached) whereas the S.No. 1583 to 1648 have been promoted to the post of S.S (Islamiyat) (photocopy attached). They are junior to me as per seniority list.

Sir my name has been ignored and it is quite injustice with me.
I request your kind honorable that my name may be included in the merit D.P.C meeting promoting me to the post of S.S having my legal wright.

Thanks

Yours Obediently


Ghulam Nabi (H.M)
G.M.S Ghumanwan
Abbottabad.

No. 10.81 dated: 11.5.16



(25)
Annex: H

(25)

GOVERNMENT OF
KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

NOTIFICATION

Dated Peshawar the May 24th, 2018.

NO.SO(SM) E&SED/2-1/2018/Promotion BS-16 to BS-17: Consequent upon the promotion of SSTs (BS-16) to SSs (BS-17) vide promotion Notification No. SO (PE) /2-6/ DPC Meeting /SST-HM/2018 dated 10.05.2018, their postings/transfers are hereby ordered as mentioned against their names:

S#	Name of Officers & Designation	To be Proposed As	Remarks
1.	Mr. Gohar Rahman SST	Services placed at the disposal of FATA Secretariat	---
2.	Mr. Javed Ali Shah SST	SS BS-17 (Biology) GHSS Dhand Saghri Kohat	A.V.P
3.	Mr. Jamil Khan SST	SS BS-17 (Biology) GHSS Allah Dhand-2 Malakand	A.V.P
4.	Mr. Asghar Khan SST	Services placed at the disposal of FATA Secretariat	---
5.	Mr. Suhail Ahmad SST	SS BS-17 (Biology) GHSS Abdul Khel D.I.Khan	A.V.P
6.	Mr. Saeed ur Rahman SST	SS BS-17 (Biology) GHSS Malakand Dir Lower	A.V.P
7.	Mr. Saddique Ullah SST	SS BS-17 (Biology) GHSS Deolai Swat	A.V.P
8.	Mr. Shujat Ali SST	SS BS-17 (Biology) GHSS Swhawar Swat	A.V.P
9.	Mr. Alamgir Khan SST	Services placed at the disposal of FATA Secretariat	---
10.	Mr. Muhammad Amin SST	SS BS-17 (Biology) GHSS Awan D.I.Khan	A.V.P
11.	Mr. Ziauddin SST	SS BS-17 (Biology) GHSS Kambat Dir Lower	A.V.P
12.	Mr. Saad Malook SST	SS BS-17 (Biology) GHSS Chitor Swat	A.V.P
13.	Mr. Muhammad Naseem SST	SS BS-17 (Biology) GHSS Shaidu Nowshera	A.V.P
14.	Mr. Haider Zaman SST	Services placed at the disposal of FATA Secretariat	---



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GOVERNMENT OF
KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

361.	Mr. Ghulam Nabi SST	SS BS-17 (Islamiyat) GHSS Dalola Abbottabad	A.V.P
362.	Mr. Muhammad Saleem SST	SS BS-17 (Islamiyat) GHSS Berote Abbottabad	A.V.P
363.	Mr. Bakhtiar Zaman SST	Services placed at the disposal of FATA Secretariat	---
364.	Mr. Muhammad Yousaf SST	Services placed at the disposal of FATA Secretariat	---
365.	Mr. Mushtaq Ahmed SST	SS BS-17 (Islamiyat) GHSS Shakoor Charsadda	A.V.P
366.	Mr. Muhammad Hamid SST	SS BS-17 (Islamiyat) GHSS Umer Zai Charsadda	A.V.P
367.	Mr. Waqar Ahmad Khalil SST	SS BS-17 (Islamiyat) GHSS Garhi Karim Dad Peshawar	A.V.P
368.	Mr. Motasimbillah SST	SS BS-17 (Islamiyat) GHSS Asbair Dir Lower	A.V.P
369.	Mr. Shafqat Ullah SST	Services placed at the disposal of FATA Secretariat	---
370.	Mr. Ghufran Khan SST	Services placed at the disposal of FATA Secretariat	A.V.P
371.	Mr. Hamid Ullah Jan SST	SS BS-17 (Islamiyat) GHSS Rahmani Khel D.I.Khan	A.V.P
372.	Mr. Amir Badshah SST	SS BS-17 (Islamiyat) GHSS Giloti D.I.Khan	A.V.P
373.	Mr. Abdur Rauf Khan SST	SS BS-17 (Islamiyat) GHSS Bangi Khan Khujri Bannu	A.V.P
374.	Mr. Mahmood ul Hassan SST	SS BS-17 (Islamiyat) GHSS Dhand Saghri Kohat	A.V.P
375.	Mr. Aziz ur Rehman SST	SS BS-17 (Islamiyat) GHSS Gumbat Kohat	A.V.P
376.	Mr. Ghulam Nazir Khan SST	SS BS-17 (Islamiyat) GHSS Kiri Shamoza D.I.Khan	A.V.P
377.	Mr. Mir Nawab Jan SST	SS BS-17 (Islamiyat) GHSS Al-Hamid Wali Noor Jani Khel Bannu	A.V.P



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GOVERNMENT OF
KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

6. Manager Printing Press Khyber Pakhtunkhwa, Peshawar.
7. District Accounts Officers concerned.
8. District Education Officers concerned.
9. PS to Chief Secretary Khyber Pakhtunkhwa, Peshawar.
10. PS to Additional Chief Secretary FATA, FATA Secretariat Warsak Road, Peshawar.
11. PS to Minister E&SE Khyber Pakhtunkhwa, Peshawar.
12. PS to Secretary E&SE Department, Khyber Pakhtunkhwa.
13. PS to Special Secretary E&SE Department, Khyber Pakhtunkhwa.
14. Incharge EMISE E&SE Department
15. Office order file.


(ANEELA FAHIM) 21/05/18
SECTION OFFICER (SCHOOLS MALE)

To

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Annex "I"

The District Education Officer
Elementry and Secondary (Male)
Abbottabad

Subject:

So(SM) E&SED/2-1 2018 promotion BS-16 to BS-17 Appeal for confirmation of regular BPS-17 and grant of incerment, revision of pension and payment of Arrears in the light of Notification No

Sir,

Most respectfully that I Submit that during 2016 my name was not included in this list Those SST who were considered for pormotion but some of them were juniors to me, vide notification No SO(PE)/2-6 DPC meeting SSt-SS (20-10-2015) issued on 17-03-2016 copy of the notification is attached.

Now by virtue of justices government has issue another notification mentioned against subject and has very kindly approved my promotion form BPS-16 to BPS-17 copy of notification dated 24 May 2018 is also attached.

Sir,

I have been retired from servics with effect form 06/04/2018. There is no doubt in my promotion vide subject notification dated 24 May 2018. Consequently I am entitled to servics increments recorded to the law. There after my pention is to be revised according to promtion/BPS-16 to BPS-17 futher after adjustment of increments and revision of pension, arrears shall become due.

In view, of the for going submission, I request that order for adjustment of increments and revision of pension along with payment of arrears may very kindly be issue on conformation of promotion form BPS -16 to BPS-17 and obliged.

Your's Obediently



Ghulam Nabi

EX SST GHSS HARNOO ABBOTTABAD

Home Address: house #: 41/7
Mohallah Muhammad Zai P/O Nawan
Shehr Teh & Distt: Abbottabad KPK

Date:

22/11/18

To,

The Provincial Ombudsman,
Khyber Pakhtunkhwa Peshawar.

Annex - "J"

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NOTICE (1)
of loss or delay
articles until

Subject: - APPEAL FOR CONFIRMATION OF REGULAR BPS-17 AND GRANT OF INCREMENT, REVISION OF PENSION AND PAYMENT OF ARREARS IN THE LIGHT OF NOTIFIACATION NO .SO (SM) E&SED/2-1/2018/PROMOTION BS-16 TO BS-17 DATED 24 MAY 2018 [Attached 1]

Respected Sir,

I have appealed No. 1081 dated 11-05-2016 [Attached 2] to the secretary E & SE Department KPK Peshawar against the notification issued vide SO (PE)/2-6/DPC MEETING SST-SS (20-10-2015) issued on 17-03-2016 [Attached 3].

In this connection it is stated that previously in 2016 my name was not included in the list of those SST who were being promoted to the post of SS BPS-17, illegally without any cogent reason for which appeal was lodged which is still pending. However, my name was considered for the regular promotion to the post of SS BPS-17 which has been notified vide notification No. SO (SM) E&SED/2-1/2018/promotion BS-16 to BS-17 dated 24 May 2018 [Attached Appointment Order] but I was retired on 06-04-2018. [Retirement Order Attached]. (4)

I have been deprived of my right to regular promotion on the post of SS BPS-17 as is evident from the notification, No. SO (PE)/2-6/DPC meeting SST-SS (20-10-2015) issued on 17-03-2016. Although I was senior in seniority standing on S.No.1512 where as the junior ranking officers who stood on S.No.1583 to 1648 have been promoted to the post of SS BPS-17 in 2016 vide above notification.

Now in this connection I Appealed to the D.E.O (Male) Abbottabad on dated 22-11-2018 [Copy 5 Attached]. He forward in original to the Director E & S education on 24-12-2018. But any response is not received till now dated 27/04/2018. Copy attached (6)

It is, earnestly implored, that my promotion to the post of SS BPS-17 on regular basis may very kindly be considered from 17-03-2016 and all the benefits accruing thereon shall be sanctioned please.

Yours Faithfully

27/4/19
GHULAM NABI

S/O MUHAMMAD AJAB KHAN

EX-SST GHSS HARNOO

ABBOTTABAD

HOUSE #: 41/7 MOHALLA MUHAMMAD ZAI

P/O NAWAN SHEHR TEHSIL AND DISTRICT ABBOTTABAD

Note:

1. CNIC Copy Attached (7)
2. I have not lodged my case in any court. (7)



PROVINCIAL OMBUDSMAN (صوبائی محتسب) SECRETARIAT,
KHYBER PAKHTUNKHWA

30

Annex "K"

No: PO/Complaint/0418/04/2019/17815
To

Dated: 02/08/2019

1. Secretary,
Elementary & Secondary Education Department
Khyber Pakhtunkhwa Peshawar.
2. Director,
Directorate of Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.

AGENCIES

Mr. Ghulam Nabi s/o Muhamamd Ajab Khan
r/o House No. 41/7 Mohallah Muhammad Zai
Tehsil & District Abbottabad.

COMPLAINANT

Subject:

**REQUEST FOR PROMOTION TO BPS-17 ON REGULAR BASIS AND
BACK BENEFITS**

Copy of the Findings dated 02/08/2019 issued by the Hon'ble Provincial Ombudsman Khyber Pakhtunkhwa in Complaint No. 0502/05/2019 filed by Mr. Ghulam Nabi s/o Muhamamd Ajab Khan r/o Abbottabad regarding the subject is enclosed herewith for information and necessary action.

THIS ISSUES WITH THE APPROVAL OF THE PROVINCIAL OMBUDSMAN

A. SATTAR KHAN
ABDUL SATTAR KHAN
(Advisor-I)

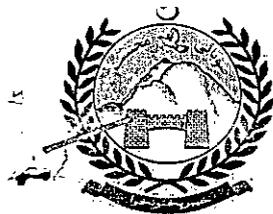
Provincial Ombudsman Secretariat,
Khyber Pakhtunkhwa

ENDST: OF EVEN NO. & DATE:

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

A. SATTAR KHAN
(Advisor-I)

Provincial Ombudsman Secretariat,
Khyber Pakhtunkhwa



PROVINCIAL OMBUDSMAN (صوبائی محتسب) SECRETARIAT,
KHYBER PAKHTUNKHWA

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CLOSURE FINDINGS		
1	COMPLAINT NO.	PO/Complaint/0418/04/2019.
2	NAME & ADDRESS OF THE COMPLAINANT	Mr. Ghulam Nabi s/o Muhamamd Ajab Khan r/o House No. 41/7 Mohallah Muhammad Zai, Tehsil & District Abbottabad
3	NAME OF THE AGENCY COMPLAINED AGAINST	1. Secretary, Elementary & Secondary Education Department Khyber Pakhtunkhwa Peshawar. 2. Director, Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
4	NAME OF THE INVESTIGATION OFFICER	Abdul Sattar Khan Advisor-I.
5	SUBJECT OF COMPLAINT	Request for promotion to BPS-17 on regular basis and back benefits
6	DATE OF REGISTRATION	03/05/2019.
7	DATE OF FINDINGS	02/08/2019.

THE COMPLAINT

Mr. Ghulam Nabi instituted complaint contending that in the year 2016, his name was not included in the list of those SSTs, who were to be promoted to the post of SS BPS- 17 against which he lodged an appeal to the Authorities which was still pending. However, his name was to be considered for regular promotion to SS BPS-17 vide notification dated 24/05/2018, but before that he got retirement on 06/04/2018 and was deprived of regular promotion. It was added that he was placed at seniority # 1512 and his Juniors at serial # 1583 to 1648 were promoted vide notification dated 17/03/2016. Complainant seeks indulgence of this Forum for redressal of his grievance.

REPORT OF THE AGENCY

Notices under Section 10(4) of the Khyber Pakhtunkhwa Provincial Ombudsman Act, 2010 were issued to Secretary, Elementary & Secondary Education Department Khyber Pakhtunkhwa Peshawar and Director, Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar to meet the allegations and submit reply including rebuttal, if any. In response Assistant Director (RTI & Ombudsman) Directorate of E&SE Khyber Pakhtunkhwa submitted reply stating that complainant had joined the post of SST BPS-16 on 25/03/1996 and his name was included in the Working Paper for promotion to BPS- 17 on regular basis in the year 2016 but he was not eligible due to non-availability of PERs.

The complainant had forged signatures on ACRs, Synopsis result, statement, non-involvement certificate and bio data as per report of DEO (M) Abbottabad, as such enquiry was conducted against him and was awarded minor punishment. Lastly, that complainant had already been promoted to BPS-17 on regular basis vide notification dated 24/05/2018 and was held not entitled to arrears of the period from 17/03/2016 to 06/04/2018.

HEARING

Complainant and representative of the Agency appeared & heard.

FINDINGS

Record shows that subject matter of complaint being service matter is fairly and squarely outside the jurisdictional domain of this Forum. Investigation is closed under Regulations 17(a) of the Khyber Pakhtunkhwa Provincial Ombudsman Office (Registration, Investigation and Disposal of Complaints) Regulations, 2011


AQAL BADSHAH
Provincial Ombudsman

27/08
19

وکالت نامہ

کورٹ فیس

بعدالت ضابطہ اس سر جوئل کے ایڈووکیٹ کورٹ آف

عنوان: غلام مسیحی بنام گورنمنٹ

منجانب: پیدائش / غلام مسیحی

نوعیت مقدمہ: سرکس ایبل

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آل مقام

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل

صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری

کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت

ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی

جگہ تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا

ساختہ پر داخستہ مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے

مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا

حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں

کوئی جز و بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد

استجارت نالاش بصیغہ مفلسی کے دائرہ کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

Attest

Accepted

بمقام:

المرقوم: 12/03/2020

"A"

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

No.

113

APPEAL No.....1958..... of 20 20

Ghulam Nabi

Appellant/Petitioner

Versus

Through Secy: Edn: to Pk Pesh.

RESPONDENT(S)

Notice to Appellant/Petitioner

Counsel

Mubammad Liaqat
Advocate High Court
Mobalabad

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 19-2-2021 at 7:50 AM

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

at Camp Court A. Alaud

[Signature]
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

FB

No.

APPEAL No. 1958 of 20 20

Ghulam Nabi

Appellant/Petitioner

Versus

Through Secy. Edu. KP Pk Pesh:

RESPONDENT(S)

Khar

Notice to Appellant/Petitioner

Ghulam Nabi S/o Ajab
(Ex-SST) GHSS Haran

R/O Narwan Sher Tehsil & Distt.
Meharabad

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 19-2-2021 at 9:30 AM

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

at Camp Court A Road



Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"B"

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

No.

18

Appeal No. 1958 of 20 20

Ghulam Nabi Appellant/Petitioner
Versus

Through Sajid Eddin Khan Respondent
Respondent No. 4

Notice to:

Account officer Abbottabad

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal on 17-6-2021 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of ✓ appeal is attached. Copy of appeal has already been sent to you vide this office Notice No. dated

Given under my hand and the seal of this Court, at Peshawar this.....

Day of March 2020

at Camp Court A. Head

[Signature]
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

“B”

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

No.

113

Appeal No. 1958 of 20 20

①

Ghulam Nabi Appellant/Petitioner

Versus

W 13/21

through Secy. Edu. K.P.K. Pesh. Respondent

Respondent No. 3

Notice to:

Accountant General Govt. of K.P.K. Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal on 17-6-2021 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No. dated~~

Given under my hand and the seal of this Court, at Peshawar this 1st

Day of March 20 21

at Camp Court A. Abad

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1 The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2 Always quote Case No. While making any correspondence.

"B"

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

1B

No.

Appeal No. 1958 of 20 20

Ghulam Nabi Appellant/Petitioner

Versus

Through Secy: Edu: KPK Peshawar Respondent

Respondent No. 2

Notice to:

Director, Edu: & Sec: Education Dept. of
KPK Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 17-6-2021 at 8.00 A.M. If you wish to urge anything against the appellent/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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Copy of appeal is attached. Copy of appeal has already been sent to you vide this

office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this.....

Day of March 2021

at Camp Court A. Mend

[Signature]
8/3/21

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
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“B”

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

No.

FB

Appeal No. 1958 of 20 20

Ghulam Nabi Appellant/Petitioner

Versus

Through Secy. Edu. 13. Pk. Pesh. Respondent

Respondent No. J

Notice to:

Gent. of K.P.C through Secy. Edu. 2 Sec. Education Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal on 17-6-2021 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No. dated~~

Given under my hand and the seal of this Court, at Peshawar this 1st Day of March 20 21

at Camp Court A. Abad

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

- Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
- 2. Always quote Case No. While making any correspondence

[Handwritten signature]
2/3/21