


28.07.2022

Due to summer vacations, the case is adjourned to 29.09.2022 for the same as before.

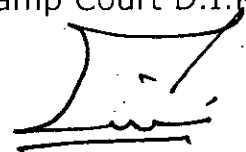

Reader

29.09.2022

Learned counsel for the appellant present. Mr. Muhammad Kamran, ADEO alongwith Mr. Muhammad Adeel Butt, Additional Advocate General for official respondents present. None present on behalf of private respondents No. 6 to 11.

Comments on behalf of official respondents submitted, copy of which handed over to learned counsel for the appellant.

Previous date was changed on Reader Note, therefore, notices be issued to private respondents No. 6 to 11 for submission of reply/comments through registered post. Adjourned. To come up for submission of reply/comments on behalf of private respondents No. 6 to 11 on 25.10.2022 before the S.B at Camp Court D.I.Khan.



(Salah-Ud-Din)
Member (J)
Camp Court D.I.Khan

25.10.2022

Appellant present through counsel.

Kabir Ullah Khattak, learned Additional Advocate General alongwith Muhammad Kamran ADEO for official respondents present. None present on behalf of private respondents No.6 to 12.

File to come up alongwith connected Service Appeal No.7509/2021 titled "Sohail Ahmad Shah Vs. Government of Khyber Pakhtunkhwa" on 22.11.2022 before S.B at Camp Court, D.I.Khan.


(Rozina Rehman)
Member (J)
Camp Court, D.I.Khan

30.02.2022

Due to retirement of the Hon'ble Chairman, the Tribunal is defunct. To come up for the same on 29.03.2022 before S.B.



Reader

29.03.2022

Counsel for the appellant present and heard.

The appeal is admitted to full hearing subject to all just and legal objections by the other side. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments on 24.05.2022 before S.B at camp court, D.I.Khan.



Chairman
Camp Court, D.I.Khan.

24.05.2022

Learned counsel for the appellant present and requested for further extension of time to deposit security and process fee, which have not been deposited within the stipulated period.

Learned counsel for the appellant is directed to deposit security and process fee within 04 working days, thereafter, notices be issued to the respondents through registered post for submission of reply/comments on 28.07.2022 before the S.B at Camp Court D.I.Khan.

Security & Process Fee

3/6



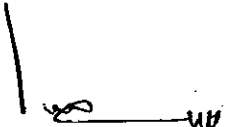
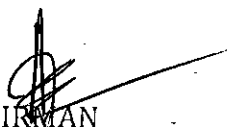
(Salah-Ud-Din)
Member (J)
Camp Court D.I.Khan

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 7511 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	06/10/2021	<p>The appeal resubmitted today by Mr. Muhammad Anwar Awan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-		<p>This case is entrusted to S. Bench at Peshawar. Notices be issued to appellant/counsel for preliminary hearing to be put up there on <u>06/12/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal presented by Mr. Sana Ullah Shamim Gandapur Advocate today i.e. on 07.2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Addresses of appellant and respondents no. 11 to 90 are incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 2- In all documents the name of the appellant may be highlighted.
- 3- Copy of departmental appeal in respect of appellant is not attached with the appeal which may be placed on it.
- ④ Annexures-A, C, E and G of the appeal are illegible which may be replaced by legible/better one.
- 5- Photo state has been made on double side of the leaf which is not acceptable the same may be made on one side.
- 6- One copy/set of the appeal in file cover be submitted for Second Member.
- 7- Memorandum of appeal may be got signed by the appellant.
- 8- Appeal has not been flagged/marked with annexures marks.
- 9- Wakalat nama is unattested.
- 10- Annexures of the appeal may be attested and affidavit may be got attested by the Oath Commissioner.
- 11- Appeal may be page marked according to the Index of the appeal.
- ⑫ Approved file cover is not used.
- 13- Certificate be given to the effect that appellant has not filed any service appeal on the subject matter earlier in the Tribunal.
- ⑭ Check list is not attached with the appeal.
- 15- 92 more copies/sets of the appeal along with annexures i.e complete in all respect may also be submitted with the appeal.

No. 1339 /S.T.

DL 19/07 /2021

REGISTRAR

SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Sanaullah Shamim Gandapur Adv.
Supreme Court at D.I.Khan

Respected Sir,
The addresses of appellant and respondents are as per KP Service Tribunal Rules, the names of appellant is highlighted in the documents. Appeal already is highlighted. Legible copies of annexures are attached. Photostate copies of Objection is removed. Second member copy is removed. Appeal as well as Wakalat Nama's Objection regarding signing of is certified. Appeal is attested. Copies of respondents are annexed. File is completed in all respects, so it may kindly be fixed before honorable bench for hearing. Objections received on 27.07.2021. Anwar Anwar (A.S.C.)

Reference your reply submitted in response to our observation, it is reiterated that the objections/observations rose by this office at serial no. 4, 12 and 14 have not been removed and still stands. Therefore, the appeal in hand is returned for removing the above mentioned observations and resubmission with 15 days.

No. _____/S.T,

Dt. _____/2021

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Syed Ghufan Ullah Shah ASC.

Siv

objection are rectified.

Answer
Adv

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

CHECK-LIST

Case Title:

Habib ul Rehman VS Govt of KPK etc

S#	CONTENTS	YES	NO
1	This Appeal has been presented by: <i>M. Anwar Awan ASE</i>		
2	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	✓	
3	Whether appeal is within time?	✓	
4	Whether the enactment under which the appeal is filed mentioned?	✓	
5	Whether the enactment under which the appeal is filed is correct?	✓	
6	Whether affidavit is appended?	✓	
7	Whether affidavit is duly attested by competent Oath Commissioner?	✓	
8	Whether appeal/annexures are properly paged?	✓	
9	Whether certificate regarding filing any earlier appeal on the subject, furnished?	✓	
10	Whether annexures are legible?	✓	
11	Whether annexures are attested?	✓	
12	Whether copies of annexures are readable/clear?	✓	
13	Whether copy of appeal is delivered to AG/DAG?	✓	
14	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	✓	
15	Whether numbers of referred cases given are correct?	✓	
16	Whether appeal contains cutting/overwriting?		No
17	Whether list of books has been provided at the end of the appeal?	✓	
18	Whether case relate to this court?	✓	
19	Whether requisite number of spare copies attached?	✓	
20	Whether complete spare copy is filed in separate file cover?	✓	
21	Whether addresses of parties given are complete?	✓	
22	Whether index filed?	✓	
23	Whether index is correct?	✓	
24	Whether Security and Process Fee deposited? On	✓	
25	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On	✓	
26	Whether copies of comments/reply/rejoinder submitted? On	✓	
27	Whether copies of comments/reply/rejoinder provided to opposite party? On		

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name:

M. Anwar Awan ASE

Signature:

[Signature]

Dated:

03/08/2021

12

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Service Appeal No 2511 /2021

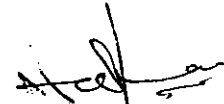
HABIB UR RAHMAN VERSUS GOVT OF K.P.K etc

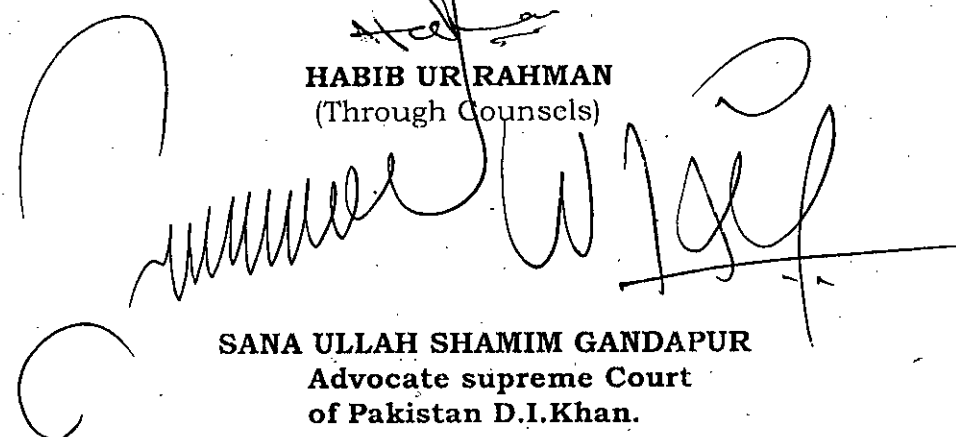
INDEX

S.NO	Particulars	Annexure	Page No
1.	Grounds of Appeal along with affidavit	---	1-5
2.	Copy of the Petitioner appointment order	A	6-13
3.	Copy of regularization order dated 10.03.2018	B	14-16
4.	Copies of office order dated 04.06.2020 and office order dated 24.06.2020 and Seniority list	C,D&E	17-21
5.	Copies of objection/reservation and its reply.	F&G	22-28
6.	Departmental applications/appeals	H	29-32
7.	Wakalatnamas		33

YOURS HUMBLE APPELLANT

Dated: /06/2021


HABIB UR RAHMAN
(Through Counsels)


SANA ULLAH SHAMIM GANDAPUR
Advocate supreme Court
of Pakistan D.I.Khan.

KANEEZ BATOOL
Advocate High Court D.I.Khan

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Service Appeal No _____ /2021

HABIB UR RAHMAN, PST GPS KIKRI MALA KHEL TEHSIL KULACHI
DIST: D I KHAN.

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 7311 (Appellant)

VERSUS

Dated 15/7/2021

1. GOVERNMENT OF KHYBER PAKHTUNKHAWA THROUGH CHIEF SECRETARY, CIVIL SECRETARIAT, PESHAWAR
2. THE SECRETARY ELEMENTARY & SECONDARY EDUCATION, KHYBER PAKHTUNKHAWA, PESHAWAR.
3. DIRECTOR ELEMENTARY & SECONDARY EDUCATION, KHYBER PAKHTUNKHAWA, PESHAWAR.
4. ASSISTANT DIRECTOR (Estb:) ELEMENTARY & SECONDARY EDUCATION, KHYBER PAKHTUNKHAWA, PESHAWAR.
5. DISTRICT EDUCATION OFFICER (DEO) MALE ,D.I.KHAN.

M. Anwar Awan
Advocate Supreme Court
D.I.Khan

Anwar

Filed to-day

Registrar

06. AQAL KHAN GPS NO.1 REHMANIKHEL DISTT: D.I.KHAN
07. ZIA UR REHMAN GPS NO.1 REHMANIKHEL DISTT: D.I.KHAN
08. HIZBULLAH KHAN GPS NO.1 TAKWARA DISTT: D.I.KHAN
09. MUHIB HUSSAIN SHAH GPS NO. 2 DHALLAH DISTT: D.I.KHAN
10. ASSAD HUSSAIN SHAH GPS WANDA TALGI DISTT: D.I.KHAN
11. ABDUR RAUF KHAN GPS KOT MASOODAN DISTT: D.I.KHAN

SERVICE APPEAL UNDER SECTION 4 OF SERVICE TRIBUNAL ACT 1974 TO DIRECT THE RESPONDENTS TO REVISE/CORRECT THE SENIORITY LIST ISSUED BY THE OFFICIAL RESPONDENTS AS PER DATE OF INITIAL APPOINTMENT AND PROMOTE THE APPELLANT AS PER THEIR SENIORITY ALONGWITH BACK AND FUTURE BENEFITS.

Respectfully Sheweth,

1. That Appellant is appointed as Primary School teacher through NTS on 17-05-2014 while Respondent No 11 to 17 are appointed as PST vide order Dated; 05-12-2014 on contract basis. Copy of Appointment Orders are Annexure A.
2. That the Appellant is Qualified PST and after his appointment, has been serving the Department with due diligence, utmost care and devotion, always tried to his best and has spotless service record. The Appellant and other were regularized on 10-03-2018. Copy of Order Dated; 10-03-2018 is Annexure B.
3. That on 04-06-2020, the concern District Education Officer vide Letter No. 11728 has sought guidance for preparing of seniority List of PSTs, the mechanism was provided by the Assistant Director (Estab;) Elementary and secondary Education Department Khyber Pakhtunkhwa (Respondent No. 04) then a Seniority list was prepared by Respondents. Copies of Office order Dated; 04-06-2020 and Office order Dated; 24-06-2020 and seniority list are Annexure C, D & E.
4. That in the impugned seniority list the Respondent No. 07 to 80 which are juniors to the Appellant are placed earlier/Seniors and given senior portion in the impugned seniority list but the Appellant even being senior is placed on junior portion in the said seniority list.
5. That as per general criteria for promotion in the education department / being civil servant is to consider the service length from the date of

initial appointment of the employee /promote which is quite absent in the impugned seniority list.

6. That on 08-01-2021 the appellant along with others submitted their objection/reservations on the impugned seniority list prepared by the department to the competent authority and the same was replied/rejected on 09-02-2021. Copies of objection/ reservations and its reply are Annexure F & G.
7. That the appellant along with others has preferred departmental Applications/ Appeal through proper channel and being senior employee sought his promotion on the basis of his seniority with effect from their initial appointment Dated; 17-05-2014. Copies of appellant Departmental application/Appeal is Annexure H.
8. That feeling aggrieved from above said action appellants are constrained to approaches this honorable court on the following amongst other:

GROUND:

1. That the action of respondents is against facts and law, ultra vires, without Jurisdiction and against the Khyber Pakhtunkhwa Employees of Elementary and Secondary Education Department (Appointment and Regulation of Services) Act 2017 as well as Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules 1989.
2. That as per rules framed by the government of KPK and also Regularization Act 2017, it is clearly mentioned that seniority of teachers would be reckoned from Section 4 of ibid Act but respondents without any lawful authority issued seniority list on its whims and wishes.
3. That as per appointment Order of petitioner issued on 17.05.2014, he was appointed in teaching cadre on terms and conditions mentioned in the Order from the date of their taking over charge but surprisingly

the private respondents who were appointed on 05.12.2014, are placed senior to the petitioner on the basis of their marks which is totally against the policy and terms and conditions mentioned in the appointment order.

4. That while regularizing the petitioner and others Primary School Teachers vide Order dated: 10.03.2018 it was termed that their seniority shall be determined on the basis of their continuous service in cadre so appellant has took the charge of the post in May 2014 while private respondents took the charge in the month of December 2014 so appellant by efflux of time is senior to the private respondents.
5. That it is also evident from the regularization order dated: 10.03.2018, the PSTs appointed on 17.05.2014 are mentioned firstly and thereafter PSTs appointed on 05.12.2014 are mentioned in ibid Order which clearly reflect that the department has issued seniority of all PSTs appointed through the above-said orders.

Answer

In wake of above submissions, it is respectfully prayed that on acceptance of instant appeal, the seniority list may please be set aside/modified being illegal, void and against the Khyber Pakhtunkhwa Employees of Elementary and Secondary Education Department (Appointment and Regulation of Services) Act 2017 as well as Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules 1989 and appellant may graciously be promoted from BPS-12 to BPS- 14 with all back/future benefit.

OR

If any other efficacious relief which this august Tribunal may deem proper/appropriate in the interest of justice may also be granted to the Appellant.

YOUR HUMBLE APPELLANT

DATED: /06/2021

HABIB UR RAHMAN
(Through Counsels)

SANA ULLAH SHAMIM GANDAPUR
Advocate supreme Court
of Pakistan D.I.Khan.

KANEEZ BATOOL
Advocate High Court D.I.Khan.

Muhammad Anwar Awan
Advocate

AFFIDAVITE

I, HABIB UR RAHMAN PST GPS KIKRI MALA KHEL TEHSIL KULACHI DIST: D I KHAN. The Appellant, do hereby solemnly affirm and declare on oath that all the contents of the Appeal are true and correct to the best of my knowledge and belief and noting has been deliberately concealed from this Honorable Court.

Deponent

Identified by Counsel;

SANA ULLAH SHAMIM GANDAPUR
Advocate supreme Court
of Pakistan D.I.Khan.



**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

Service Appeal No _____ /2021

HABIB UR RAHMAN VERSUS GOVT OF K.P.K etc

BOOKS REFERED;

- Constitution of Islamic Republic of Pakistan 1973.
- Service Laws.
- Case laws.

VERIFICATION; / CERTIFICATE.

I, **HABIB UR RAHMAN**, verify that it is the first Appeal and no such Appeal has ever been preferred in this honorable Tribunal by the Appellant and all the contents of above Appeal/petition are true and correct.


HABIB UR RAHMAN



- A -

Appointment Order's PST (Male) Dera Ismail Khan

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OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
DERA ISMAIL KHAN

APPOINTMENT

Consequent upon recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the post of PST, School based, in BPS-12 (Rs. 7000-500-22000) @ Rs. 7000/- fixed plus usual allowances as admissible under the rules on adhoc basis on Contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with effect from the date of their taking over charge:-

S.No	Roll No	NAME	FATHER'S NAME	CNIC	SCORE	PLACE OF POSTING	UNION, COUNCIL
DERA ISMAIL KHAN							
1.	1760062	MUHAMMAD SHAHID	QAYYUM NAWAZ	12101-6286930-3	93.5	GPS DARWESHA	CHEHKAN
2.	1760177	BASHIR AHMAD	MUHAMMAD AFZAL	12101-8038430-1	97.19	GPS GARA BALA	CHEHKAN
3.	1760752	NAVEED AHMAD	NAZIR AHMD	12101-2041550-9	109.58	GPS GARA HASSANI	CHEHKAN
4.	1760368	MUHAMMAD RAMZAN	SHER ZAMAN	12101-7034423-1	116.35	GPS GARA MORE	CHEHKAN
5.	1760733	RAHMAF ULLAH	SARFARAZ	12101-5709320-3	95.33	GPS HAINDAN	CHEHKAN
6.	1760335	MAZHAR IQBAL	MUHAMMAD IQBAL	12101-4536514-5	87.57	GPS JANDI SINDH	CHEHKAN
7.	1761263	MUHAMMAD ABBAS	MUHAMMAD RAMZAN	12101-1989179-5	109.62	GPS JEVAYA SAHI	CHEHKAN
8.	1760735	MUHAMMAD SALEEM	KARIM BAKHSH	12101-0972120-3	117.46	GPS NO. 2 POTA	CHEHKAN
9.	1762690	MUHAMMAD NADEEM AKHTAR	MUHAMMAD ASLAM	12101-3818810-5	87.92	GPS NO. 2 POTA	CHEHKAN
10.	1761200	RAB NAWAZ	GUL SHER	12101-7539649-3	95.9	GPS NURANG UTRA	CHEHKAN
11.	1761043	ABDUL BASAT	MAULVI GHULAM HASSAN	12101-3958240-7	116.49	GPS SHERU KOHNA	CHEHKAN
12.	1760108	SANA ULLAH	GHULAM QADIR	12101-9636197-3	88.45	GPS SIKANDAR SHUMALI	CHEHKAN
13.	1766832	SHAHZADA MUHIB ULLAH	MUHAMMAD ASLAM	12101-3837795-9	92.31	GPS SIWAG	CHEHKAN
14.	1760603	MUHAMMAD ALTAJ KHAN	UMAR HAYAT KHAN	12101-7309163-5	98.29	GPS TAI	CHEHKAN

Anwar
M. Anwar Awan
Attorney
Supreme Court

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No	Roll No	NAME	FATHER'S NAME	CNIC	SCORE	PLACE OF POSTING	UNION COUNCIL
265	1762894	MUHAMMAD ARSHAD	ALAM SHER	21708-9023653-5	82.65	GPS NO. 1 KOT ISSA KHAN	GARA ISA KHAN
266	1763073	MUHAMMAD TOUSIF	ABDUS SATTAR	12104-9980052-7	97.23	GPS NO. 2 GANDI UMÉR KHAN	GARA ISA KHAN
267	1762117	MUHAMMAD AMJAD	ALAM SHER	12104-3355116-7	84.6	GPS RAMZI	GARA ISA KHAN
268	1760623	MUHAMMAD RIZWAN	HAJI MUHAMMAD AKRAM	12102-0685071-7	106.14	GPS SAGGU	GARA ISA KHAN
269	1764178	MUHAMMAD BILAL	MUHAMMAD ASLAM	12102-0514263-1	89.27	GPS SAGGU	GARA ISA KHAN
270	1763313	IRFAN ULLAH KHAN	REHMAT ULLAH KHAN	12102-2435845-3	100.1	GMPS KIRRI BAHADAR KHEL	HATHALA
271	1760037	GHULAM ABBAS	GHULAM MOHAMMAD	12102-6920001-9	106.7	GMPS NO. 1 HATHALA	HATHALA
272	1763080	MUHAMMAD FAROOQ	RISALDAR	12102-9661578-1	99.56	GPS AUDAL	HATHALA
273	1760379	KIRAMAT ULLAH	KALOO KHAN	12201-7146468-5	96.68	GPS GARA MOHABBAT	HATHALA
274	1760047	BINYAMIN KHAN	ABDUL QAYYUM KHAN	12102-6587973-1	94.56	GPS GARA MOHABBAT	HATHALA
275	1760803	SYED MUJEEB AHMAD SHAH	SYED IBRAHIM SHAH	12102-8818946-9	110.96	GPS GARA NAWABI	HATHALA
276	1763789	ABDUL WAHEED KHAN	QASIM KHAN	12102-8564126-7	103.92	GPS GARA NAWABI	HATHALA
277	1762871	MUHAMMAD IRFAN KHAN	JUMMA KHAN	12101-4218025-9	113.41	GPS HORI	HATHALA
278	1762111	SAFI ULLAH	GHULAM MUHAMMAD	12102-5821325-7	94.91	GPS HORI	HATHALA
279	1763657	HABIB UR REHMAN	SAIF UR REHMAN	12101-2698816-9	94.42	GPS KIKRI MALA KHEL	HATHALA
280	1762390	SAFIULLAH KHAN	SYED KHAN	12102-2808730-3	135.45	GPS KIRRI MALANG	HATHALA
281	1760955	SHAFQAT ULLAH KHAN	BARKAT ULLAH KHAN	12102-3786840-3	129.22	GPS KIRRI MALANG	HATHALA
282	1762795	RIAZ AHMAD	ABBAS KHAN	12101-1717849-7	124.91	GPS KIRRI MALANG	HATHALA
283	1762689	SAHIR KHAN	ABDUL US SAMAD	12104-4668439-5	88.37	GPS BUZDAR	KIRRI SHAMOZAI
284	1760487	ISRAR AHMAD	HIDAYAT ULLAH	12104-7955332-1	82.94	GPS BUZDAR	KIRRI SHAMOZAI

M. Anwar Awan
M. Anwar Awan
 Advocate Supreme Court
 D.I.Khan

S.No	Roll No	NAME	FATHER'S NAME	CNIC	SCORE	PLACE OF POSTING	UNION COUNCIL
618.	1760171	OBAD ULLAH	KHALIL UR RAHMAN	12101-0899685-3	124.87	GPS NO.3 PAROA	PAROA
619.	1762676	MUHAMMAD KHALID	SAIF ULLAH	12101-1005269-1	87.08	GPS NO.4 PAROA	PAROA
620.	1764238	SHAH NAWAZ	RAB NAWAZ	12101-0930161-1	92.85	GPS NO.5 PAROA	PAROA
621.	1761938	SAMI ULLAH	QADIR BAKHSH	12101-2693445-1	84.6	GPS NO.5 PAROA	PAROA
622.	1760563	RASHEED AHMAD	DUR MUHAMMAD	12101-5965545-1	86.05	GPS THAT SOLAN	PAROA.

TERMS & CONDITIONS

1. NO TA/DA etc is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. Appointment is purely on temporary & contract basis initially for one year from the date of issuance.
4. He should not be handed over charge if he exceeds 35 years or below 18 years of age. Age relaxation case may be submitted to competent authority (if required).
5. Appointment is subject to the condition that the certificate/documents must be verified from the concerned authorities by the DEO, anyone found producing bogus Certificate will be reported to the law enforcing agencies for further action. Expenditure on verification will be borne by the appointees.
6. His services are liable to termination on one month's notice from either side. In case of resignation without notice his one-month pay/allowances shall be forfeited to the Government.
7. Pay will not be drawn until and unless a certificate regarding verification of his documents is issued by this office.
8. He should join his post within 10 days of the issuance of this notification. In case of failure to join the post within stipulated period, his appointment will stand expired automatically and no subsequent appeal etc shall be entertained.
9. Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
10. Before handing over charge, he will have to sign an agreement with the Department; otherwise this order will not be valid.
11. He will be governed by such rules and regulations as may be issued from time to time by the Govt.
12. His services shall be terminated at any time, in case his performance is found unsatisfactory during his contract period. In case of misconduct, he shall be proceeded under the rules framed from time to time.
13. His appointment is made on School based, He will have to serve at the place of posting, and His service is not transferable to any other station.

M. Anwar Awan
M. Anwar Awan
 Advocate Supreme Court
 D.I.Khan

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OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
DERA ISMAIL KHAN

A
+
R. S. P. S. 10
10

APPOINTMENT

Consequent upon recommendation of the Departmental Selection committee appointment of the following candidates are hereby ordered against the vacant posts of PST School based in BPS-12 (Rs. 7000-500-22000) @ Rs. 7000/- fixed plus usual allowances as admissible under the rules on adhoc basis, on Contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and conditions given below with effect from the date of their taking over charge.

Roll No.	Name	Father Name	D.O.B.	CRIC	Merit Position	Place of Posting	Circle/Center
1	1760493 RANMAD ULLAH	MUHAMMAD AMIR	06/06/1984	12101-822438-3	33.49	GPS CHEHRAN	CHEHRAN
2	1750921 HAFIZ MOHAMMAD TAHIR RASHID	ABDUR RASHID KHAN	01/08/1989	12101-4607199-9	160.23	GPS GARA AHMAD	CHEHRAN
3	1760332 ASIF MAHAZ	ALHAJI INAWAZ	07/04/1994	12101-4701491-3	55.22	GPS GARA DAD	CHEHRAN
4	176223 MUHAMMAD BILAL	ABDUL RAHEEM	87	12101-7201439-7	111.67	GPS GARA MOCHI	CHEHRAN
5	176824 MUHAMMAD VASIR KHAN	ASDUK SALAM	04/01/1986	12101-4120138-3	95.95	GPS NO. 1 POSTA	CHEHRAN
6	176027 TARSEEN ULLAH	FAZAL AHMAD	14/06/1992	12101-3027815-5	54.21	GPS SHERU KOHNA	CHEHRAN
7	176358 KHADIM RASOOL	SAID RASOOL	14/01/1973	12101-3907630-9	34.82	GPS SHERU SAU	CHEHRAN
8	174000 MUHAMMAD QASIM MUDDASIR	HAFIZ ILAH BAKHSH	05/03/1981	12101-5713694-9	95.46	GPS ASHA MOJIB	DD-2
9	176649 NATAN BILI	HASHIQ HUSSAIN SHAH	07/04/1981	12101-0919804-9	108.59	GPS CHAIT SARWAR	DD-2
10	1762261 NAVEED AHMED	ABDUL MAJEED	15/04/1987	12101-6529025-5	115.36	GPS IBAST DIRKMAN	DD-2
11	1764245 NAJIBULLAH KHAN	HABIBULLAH KHAN	17/03/1984	12101-0657933-9	105.03	GPS CHAIT BARI VALA	DD-1
12	1762598 MALIK MUHAMMAD ALYAF	MUHAMMAD NAWAZ	15/05/1979	12101-6092355-5	83.62	GPS KASSA	DD-2
13	1760800 ISHTIQ AHMED	SDFI GHULAM HASSAN	23/03/1976	12101-9150166-1	105.22	GPS RACHT PAIND KHAN	DD-2
14	1760472 MUHAMMAD FARIQ	MUHAMMAD HAMZAN	24/09/1978	12101-9956478-3	100.98	GPS NO. 2 TIGORA FAZI	DD-2
15	1760973 IHSANULLAH	GHULAM HASSAN	22/11/1988	12101-1599769-3	55.57	GPS NO. 2 TIGORA FAZI	DD-2
16	1761633 SASAR SHAH	MUHAMMAD KHALID USMAN	20/03/1985	12101-3623914-9	89.58	GPS TAJM AHAD	DD-2
17	1769532 NADEEM KHAN	ABDUR REHMAN	01/07/1973	12101-0913331-7	107.87	GPS MAD ALI SHAH	DEWANA
18	1761605 MUHAMMAD NASR KHAN	SHAH NAWAZ KHAN	04/03/1981	12101-0275295-7	100.57	GPS POLICE LINE	DEWANA
A	1766602 IHSANULLAH	SAHIB JAN	03/04/1978	35202-524476-7	111.6	GPS NABEEN DARI	GILOTI
20	1763950 USMAN ALI	HAZIR AHMAD	04/03/1985	12101-572982-9	115.91	GPS NO. 1 GILTI	GILTI

M. Anwar Awan
Advocate
D.I. Khan

Accepted

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Appointment Orders PST (Male) 2nd Phase, Adhoc. D.Khuln

Sl. No.	Roll No.	Name	Father Name	D.O.B.	GNIC	Merit Position	Place of Posting	Unit/Controlling Office
21	1760190	INAYAT ULLAH	SAIF ULLAH	05/04/1985	12101-8123651-9	109.68	GPS WANDA ABHU	GILOTT
22	1760190	MUHAMMAD YALBEM	YASEEN	05/01/1988	12101-9108133-3	83.68	GPS AZIZ ABAD	HISSAM
23	1760193	SHAFIQ UR REHMAN	AMIR KHAN	22/03/1988	12101-4231644-3	89.25	GPS GARA MAJMAN	HISSAM
24	1760193	GULISTAN	FAIZ UR REHMAN	02/11/1984	12101-2489781-1	92.22	GPS NIAZI ABAD	HISSAM
25	1760193	MUHAMMAD ARIJF	SHER ZAMAN	02/03/1990	12101-1219968-1	80.16	GPS NIAZI ABAD	HISSAM
26	1760193	ABDUL HAMEED	MUHAMMAD HASHIM	12/10/1988	12101-6061024-9	100.25	GPS SAGGU JANUBI	HISSAM
27	1760193	MUHAMMAD ZUBAIR	GHULAM QADIR	11/09/1993	12101-8537542-9	79.71	GPS SOHLAN	HISSAM
28	1760193	MUHAMMAD IMRAN	NADIR BAKHSI	20/10/1988	12101-3595425-1	93.07	GPS WAZIR NAGAR	HISSAM
29	1760191	GHULAM YASIN	RAJIB NAWAZ	05/09/1975	12101-0984583-3	96.26	GPS ABDULLAH ABAD	KECI
30	1760191	FAIZ ABBAS	MULAZIM HUSSAIN	01/01/1978	12101-7245134-5	80.35	GPS JABAR WALA	KECI
31	1760191	MUHAMMAD IQBAL	HAFI MUHAMMAD RAMZAN	10/10/1987	12101-4397845-3	109.74	GPS MAIZER ABAD	KECI
32	1760171	FAZLUR ZAMAN	FAIZ MUHAMMAD	20/02/1978	12103-1479351-1	81.51	GPS NO. 1 MUQEEM SHAH	KECI
33	1760199	MUHAMMAD ASLAM	LAL GUL	06/09/1992	12101-3464719-1	73.61	GPS NO. 1 MUQEEM SHAH	KECI
34	1760190	MUHAMMAD AFSHAD IQBAL	MUHAMMAD LATIF AKHTAR	04/04/1979	12101-9695114-7	108.82	GPS AJLA	KOTLA SAIDAN
35	1760197	REHMAT ULLAH	GHULAM QASIM	03/11/1986	12101-2909724-3	104.49	GPS CHAH FAQEER WALA	KOTLA SAIDAN
36	1762270	MUHAMMAD ASLAM KHOKHAR	REHMAT ULLAH	06/08/1974	12101-8846286-9	89.58	GPS DIN PUR	KOTLA SAIDAN
37	1762080	HOAM ULLAH	ALLAH DWAYA	11/11/1991	12101-7026501-5	89.45	GPS DIN PUR	KOTLA SAIDAN
38	1760357	MUHAMMAD IMRAN	FAZAL UR REHMAN	14/03/1990	12101-4608343-7	87.86	GPS DIN PUR	KOTLA SAIDAN
39	1760992	MUHAMMAD TARIQ	MUHAMMAD HASHIM	01/12/1988	12101-2733497-1	87.39	GPS DIN PUR	KOTLA SAIDAN
40	1762603	IMRAN KHAN NIAZI	GHULAM RASOOL	31/03/1982	12101-0960061-1	110.03	GPS KAIRAN ABAD	KOTLA SAIDAN
41	1763087	FAYYAZ HUSSAIN	SYED ZAKIR HUSSAIN SHAH	04/01/1979	12101-0931672-9	110.94	GPS KOTLA SAIDAN	KOTLA SAIDAN
42	1760378	MUHAMMAD AMIN	ILLAH BAKHSI	20/03/1978	12101-8273727-3	94.04	GPS NAWAH	KOTLA SAIDAN
43	1760367	IMRAN KHAN	SHAH NAWAZ	10/03/1984	12101-1667467-9	77.99	GPS GARA BAKHSIA	KURAI
44	1760522	AKHTAR ZAMAN	ALAMGIR KHAN	01/01/1970	12103-1495187-9	82.47	GPS GARA HAYAT	KURAI
45	1760284	MUHAMMAD YUNAS	HAFIZ BASHIR AHMAD	09/02/1988	12101-9276771-7	78.5	GPS GARA HAYAT	KURAI
46	1763334	MUHAMMAD AKRAM	MUHAMMAD ASLAM	15/04/1985	12101-5186048-3	91.45	GPS GOMAL KHURD	KURAI
47	1762751	MUHAMMAD ATIF SHAHID	AMAN ULLAH	18/04/1983	12101-7149183-1	113.84	GPS KURAI	KURAI
48	1762895	MAJED UR REHMAN	SHAIKH SONA KHAN	16/10/1979	12101-7740667-3	105.78	GPS-KURAI	KURAI

Attestel

Amir

M. Amir Awad
Advocate Supreme Court
D.Khuln

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S.No.	Roll No.	Name	Father Name	D.O.B.	CNIC	Merit Position	Place of Posting	Union Coun
215.	1764226	MUHAMMAD WASEEM SATTAR	ABDUL SATTAR JASKANI	15/04/1987	32103-7171202-1	87.69	GPS NO. 3 RAMAK	MIRAN
216.	1760464	ABDUL SATTAR	ZAWAR HUSSAIN	10/03/1987	12101-9200938-5	87.39	GPS GARA TAHIR	NAJVELA
217.	1760798	ALAMGIR	IMAM BAKHSH	25/10/1980	12101-1258640-5	100.53	GPS KOTAH BALOCHAN	NAJVELA
218.	1763999	INTIZAR HUSSAIN	MUKHTIAR HUSSAIN	25/12/1991	12101-5753979-5	83.96	GPS NAJVELLA	NAJVELA
219.	1760645	MUHAMMAD ISHAQ KHAN	AMAN ULLAH KHAN	01/03/1981	12101-0992030-7	83.62	GPS DHANDLA	PAROA
220.	1762589	WASI UL QUDDOS	HAJI ABDUL QUDDOS -	24/04/1978	12101-0989303-3	94.11	GPS LADHU KARLU	PAROA

TERMS & CONDITIONS

1. NO TA/DA etc is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. Appointment is purely on temporary & contract basis initially for one year from the date of issuance.
4. He should not be handed over charge if his age exceeds 35 years or below 18 years, except that appointee to whom age relaxation is granted by the Establishment Department as well as by the appointing authority.
5. Appointment is subject to the condition that the certificate/documents must be verified from the concerned authorities by the DEO. Anyone found producing bogus Certificate will be reported to the law enforcing agencies for further action. Verification fee will be borne by the appointee.
6. His services are liable to termination on one month's notice from either side. In case of resignation without notice, his one-month pay/allowances shall be forfeited to the Government.
7. Pay will not be drawn until and unless a certificate regarding verification of his documents is issued by this office.
8. He should join his post within 10 days of the issuance of this notification. In case of failure to join the post within stipulated period, his appointment will stand expired automatically and no subsequent appeal etc. shall be entertained.
9. Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
10. Before handing over charge, he will have to sign an agreement with the Department; otherwise this order will not be valid.
11. He will be governed by such rules and regulations as may be issued from time to time by the Govt.
12. His services shall be terminated at any time, in case his performance is found unsatisfactory during his contract period. In case of misconduct, he shall be proceeded under the rules framed from time to time.
13. His appointment is made on School based. He will have to serve at the place of posting, and his service is not transferable to any other station.
14. Before handing over charge, once again his documents may be checked by the DDO concerned, if he has not the required relevant qualification as per rules or in case of any degree/certificate issued after January 20, 2014 against which he claimed score for merit he may not be handed over charge of the post.

Attested
M. Anwar Awan
Advocate Supreme Court
D.Khan

15. The appointee must belong to the same union council where school is situated otherwise the DDOs are directed not to hand over the charge.
16. Copy of professional standards, core competencies and job description for PST (Annex-A) issued vide Govt. of Khyber Pakhtunkhwa, E&SED Notification No. SO (PE) 4-3/PST/2014 dated 17.09.2014 is attached with the appointment order.

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Muhammad Rinz Swati
District Education Officer (M)
Dera Ismail Khan

Endst No. 23048-23274/PST(NTS) Dated DIKhan the 05/12 2014

Copy forwarded for information and necessary action to:

1. The Director E&SE Khyber Pakhtunkhwa, Peshawar.
2. The District Comptroller of Accounts DIKHAN.
3. The PS to the Secretary to Govt, Khyber Pakhtunkhwa E&SE Department.
4. The SDEOs (Male) DIKhan/Paharpur/Paroa/Kulachi.
5. The Candidates Concerned.
6. Master File.

Attested

M. Anwar Awan
Advocate Supreme Court
Dera Ismail Khan

District Education Officer (M)
Dera Ismail Khan

- B -

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Regularization Order PST (NTS Adhoc) (2018) Dera Ismail Khan.



OFFICE OF THE
DISTRICT EDUCATION OFFICER,
(MALE) DERA ISMAIL KHAN
Tel: 09669280138-09669280131
Email: emsdxkhan@gmail.com

NOTIFICATION:

In pursuance of Section-3 of the Khyber Pakhtunkhwa Employees of Elementary & Secondary Education Department (Appointment & Regularization of Services) Act, 2017, read with section-1 sub-section-(2) of the Act ibid and Law Department Government of Khyber Pakhtunkhwa advice bearing No. ALD-III/Legis:1(4)2017/No:19888-90 dated 20/03/2017 & Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department Notification No. SO(S/P)E&SED/3-2/2018/SITT/Contract dated 22-02-2018, the services of following Primary School Teachers (PSTs) are hereby regularized in BPS-12 with effect from the date of their initial appointment.

Sr	Roll No	Name	Total Marks (out of 200)	School	UC	Appointment order No and dated	Extension Order No and dated if any	CNIC
1	176002	MUHAMMAD SHAHID	93.5	GPS DARWESHA	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-6286930-3
2	1760477	BASHIR AHMAD	97.19	GPS QARA BALA	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-8038430-1
3	1760752	NAVEED AHMAD	109.58	GPS QARA HASSANI	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-2641550-9
4	1760368	MUHAMMAD RAMZAN	116.35	GPS QARA MORE	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-7034423-1
5	1760733	RAHMAT ULLAH	95.33	GPS HAIN DAN	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-5709320-3
6	1760335	MAZHAR IQBAL	87.57	GPS JANDI SINDH	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-4536514-5
7	1762690	MUHAMMAD NADEEM AKHTAR	87.92	GPS NO. 2 POTA	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-3818810-5
8	1764200	RAB NAWAZ	95.9	GPS NURANG UTRA	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-37539649-3
9	1764043	ABDUL BASAT	116.49	GPS SHEBU KOHNA	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-3958240-7
10	1760108	SANA ULLAH	88.45	GPS SIKANDAR SHUMALI	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-9636197-3
11	1760822	SHAHZADA MUHIB ULLAH	92.31	GPS SIWAO	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-3837795-9
12	1760603	MUHAMMAD ALTAF KHAN	98.29	GPS TAJ	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-73209163-5
13	1762586	MATI ULLAH	112.95	GPS BASTI DIRKHAN	DD# 1	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-8927011-7
14	1763381	MUHAMMAD JAVED KHAN	98.86	GPS CHAH BAREY WALA	DD# 1	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-5971143-9
15	1760005	MUHAMMAD YOUNIS	127.49	GPS KACHI PAIND KHAN	DD# 2	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-3032309-7
16	1763031	MUHAMMAD WAQAR AHMAD	112.77	GPS NO. 1 THOYA FAZIL	DD# 2	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-7810587-1
17	1760365	MALIK UMAIR YASIN	107.28	GPS NO. 1 THOYA FAZIL	DD# 2	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-4061211-7
18	1760921	AFNAN KHAN	103.37	GPS NO. 1 THOYA FAZIL	DD# 2	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-0217588-7
19	1760280	AZMAT ULLAH	101.43	GPS NO. 2 THOYA FAZIL	DD# 2	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-09953316-5
20	1760338	SAMI ULLAH KHAN	91.13	GPS NO. 2 THOYA FAZIL	DD# 2	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-7097201-5
21	1760755	MALIK MUHAMMAD IRFAN	88.19	GPS TAHIM ABAD	DD# 2	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-8201696-9
22	1760835	MUHAMMAD HASHIM	102.24	GPS BASTI DHAPPAN WALI	Deewala	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-6936562-1
23	1760648	MUHAMMAD ILYAS	107.04	GPS CHAH MALIK WALA	Deewala	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-7076340-5
24	1760028	MUHAMMAD EHSAN	105.62	GPS CHAH MALIK WALA	Deewala	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-0940624-9
25	1760808	ZUBAIR AHMAD	109.4	GPS MADNI TOWN	Deewala	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-3119854-5

M. Anwar Anwar
Advocate Supreme Court
D.I.Khan

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Regularization Order PST (NTS Adhoc) (2018) Dera Ismail Khan

Sr	RollNo	Name	Total Marks (out of 200)	School	UC	Appointment order No and dated	Extension order No and dated if any	CNIC
234	1762121	MUHAMMAD IMRAN	98.6	GPS MOCHI WAL	Gara Isa Khan	No. 7135-7765 Dated: 17-05-2014	No. 15408-14 Dated: 02-06-2017	12104-8291128-9
235	1762894	MUHAMMAD ARSHAD	82.65	GPS NO. 1 KOT ISSA KHAN	Gara Isa Khan	No. 7135-7765 Dated: 17-05-2014	No. 15408-14 Dated: 02-06-2017	21708-9023633-5
236	1763073	MUHAMMAD TOUSIF	97.23	GPS NO. 2 QANDI UMER KHAN	Gara Isa Khan	No. 7135-7765 Dated: 17-05-2014	No. 15408-14 Dated: 02-06-2017	12104-9916052-7
237	1762117	MUHAMMAD AMJAD	84.6	GPS RAMZI	Gara Isa Khan	No. 7135-7765 Dated: 17-05-2014	No. 15408-14 Dated: 02-06-2017	12104-3353116-7
238	1760623	MUHAMMAD RIZWAN	106.14	GPS SAQQU	Gara Isa Khan	No. 7135-7765 Dated: 17-05-2014	No. 15408-14 Dated: 02-06-2017	12102-0681071-7
239	1764178	MUHAMMAD BILAL	89.27	GPS SAQQU	Gara Isa Khan	No. 7135-7765 Dated: 17-05-2014	No. 15408-14 Dated: 02-06-2017	12102-0514263-1
240	1763313	IRFAN ULLAH KHAN	100.1	OMPS KIRRI BAHADAR KHEL	Hathala	No. 7135-7765 Dated: 17-05-2014	No. 15408-14 Dated: 02-06-2017	12102-2435843-3
241	1760037	GHULAM ABBAS	106.7	OMPS NO. 1 HATHALA	Hathala	No. 7135-7765 Dated: 17-05-2014	No. 15408-14 Dated: 02-06-2017	12102-692001-9
242	1763080	MUHAMMAD FAROOQ	99.56	GPS AUDAL	Hathala	No. 7135-7765 Dated: 17-05-2014	No. 15408-14 Dated: 02-06-2017	12102-9661578-1
243	1760379	KIRAMAT ULLAH	96.68	GPS QARA MOHABBAT	Hathala	No. 7135-7765 Dated: 17-05-2014	No. 15408-14 Dated: 02-06-2017	12201-7146461-5
244	1760047	BINYAMIN KHAN	94.56	GPS QARA MOHABBAT	Hathala	No. 7135-7765 Dated: 17-05-2014	No. 15408-14 Dated: 02-06-2017	12102-6587973-1
245	1760803	SYED MUJEEB AHMAD SHAH	110.96	GPS QARA NAWABI	Hathala	No. 7135-7765 Dated: 17-05-2014	No. 15408-14 Dated: 02-06-2017	12102-8818946-9
246	1763789	ABDUL WAHEED KHAN	103.92	GPS QARA NAWABI	Hathala	No. 7135-7765 Dated: 17-05-2014	No. 15408-14 Dated: 02-06-2017	12102-8564126-7
247	1762871	MUHAMMAD IRFAN KHAN	113.41	GPS HORI	Hathala	No. 7135-7765 Dated: 17-05-2014	No. 15408-14 Dated: 02-06-2017	12101-4218025-9
248	1762111	SAPI ULLAH	94.91	GPS HORI	Hathala	No. 7135-7765 Dated: 17-05-2014	No. 15408-14 Dated: 02-06-2017	12102-2513251-7
249	1763657	HABIB UR RAHMAN	94.42	GPS KIRRI MALA KHEL	Hathala	No. 7135-7765 Dated: 17-05-2014	No. 15408-14 Dated: 02-06-2017	12101-2698116-9
250	1762390	SAPI ULLAH KHAN	135.45	GPS KIRRI MALANG	Hathala	No. 7135-7765 Dated: 17-05-2014	No. 15408-14 Dated: 02-06-2017	12102-2808730-3
251	1760955	SHAFQAT ULLAH KHAN	129.22	GPS KIRRI MALANG	Hathala	No. 7135-7765 Dated: 17-05-2014	No. 15408-14 Dated: 02-06-2017	12102-3786840-3
252	1762689	SAHIB KHAN	88.37	GPS BUZDAR	Kirri Shamoza	No. 7135-7765 Dated: 17-05-2014	No. 15408-14 Dated: 02-06-2017	12104-4668439-5
253	1760487	ISRAR AHMAD	82.94	GPS BUZDAR	Kirri Shamoza	No. 7135-7765 Dated: 17-05-2014	No. 15408-14 Dated: 02-06-2017	12104-7933321-1
254	1764366	SANA ULLAH	89.73	GPS QANJU	Kirri Shamoza	No. 7135-7765 Dated: 17-05-2014	No. 15408-14 Dated: 02-06-2017	12102-1203092-5
255	1762075	IRFAN ULLAH	82.79	GPS GUR WALI	Kirri Shamoza	No. 7135-7765 Dated: 17-05-2014	No. 15408-14 Dated: 02-06-2017	12103-0354611-1
256	1760014	WAQAR AHMAD	106.56	GPS JHOKE RIND	Kirri Shamoza	No. 7135-7765 Dated: 17-05-2014	No. 15408-14 Dated: 02-06-2017	12104-2502780-7
257	1760191	ABDUL SALAM	81.14	GPS JHOKE SARWAR	Kirri Shamoza	No. 7135-7765 Dated: 17-05-2014	No. 15408-14 Dated: 02-06-2017	12104-5047457-9
258	1760179	PARMAN ULLAH	81.33	GPS NARANGI	Kirri Shamoza	No. 7135-7765 Dated: 17-05-2014	No. 15408-14 Dated: 02-06-2017	12102-4026215-9
259	1760989	MUHAMMAD JAMSHED	119.38	GPS NO. 1 KIRRI SHAMOZAI	Kirri Shamoza	No. 7135-7765 Dated: 17-05-2014	No. 15408-14 Dated: 02-06-2017	12104-2596828-3
260	1760887	UBAID UR REHMAN	109.03	GPS NO. 1 KIRRI SHAMOZAI	Kirri Shamoza	No. 7135-7765 Dated: 17-05-2014	No. 15408-14 Dated: 02-06-2017	12104-1592910-5
261	1760880	ZAHOR AHMAD	96.06	GPS NO. 1 MANGAL	Kirri Shamoza	No. 7135-7765 Dated: 17-05-2014	No. 15408-14 Dated: 02-06-2017	12102-2143364-3
262	1762781	QULISTAN KHAN	82.47	GPS NO. 2 KIRRI SHAMOZAI	Kirri Shamoza	No. 7135-7765 Dated: 17-05-2014	No. 15408-14 Dated: 02-06-2017	12105-0351807-1
263	1763958	TANVEER ULLAH KHAN	97.5	GPS BEHLOL KHEL	Kulachi	No. 7135-7765 Dated: 17-05-2014	No. 15408-14 Dated: 02-06-2017	12102-8754762-5
264	1763134	SHAPI ULLAH KHAN	112.71	GPS KHUB BASTI	Kulachi	No. 7135-7765 Dated: 17-05-2014	No. 15408-14 Dated: 02-06-2017	12102-9460428-9
265	1763352	HAIBAT KHAN	107.51	GPS KHUB BASTI	Kulachi	No. 7135-7765 Dated: 17-05-2014	No. 15408-14 Dated: 02-06-2017	12102-4731014-7
266	1763515	KHALIL UR REHMAN	111.97	GPS MOHALAH HUSSAIN ZAI	Kulachi	No. 7135-7765 Dated: 17-05-2014	No. 15408-14 Dated: 02-06-2017	12201-5340659-5
267	1760149	AHMAD NAWAZ	105.8	GPS MOHALAH HUSSAIN ZAI	Kulachi	No. 7135-7765 Dated: 17-05-2014	No. 15408-14 Dated: 02-06-2017	12102-2130877-3
268	1760180	ALLAH NAWAZ	105.7	GPS MOHALAH KAMAL KHEL	Kulachi	No. 7135-7765 Dated: 17-05-2014	No. 15408-14 Dated: 02-06-2017	12102-2146216-7
269	1763278	HIKMAT ULLAH KHAN	96.07	GPS MOHALAH KAMAL KHEL	Kulachi	No. 7135-7765 Dated: 17-05-2014	No. 15408-14 Dated: 02-06-2017	12102-3285124-3
270	1763293	MUHAMMAD AMJAD KHAN	92.58	GPS MOHALAH MUSA ZAI	Kulachi	No. 7135-7765 Dated: 17-05-2014	No. 15408-14 Dated: 02-06-2017	12102-1599184-9

M. Anwar Awan
Advocate Supreme Court
D.I. Khan

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MINORITY QUOTA

Regularization Order PST (NTS Adhoc) (2018) Dera Ismail Khan

No	Name	Address	Total Marks (out of 200)	School	UC	Appointment order No and dated	Extension order No and dated if any
2332000995	RISHI HANS	DIKhan	90.48	GPS NEW ABADI KOTLA SAIDAN	Kotla Saidan	No. 12081-1221 dated 03-03-2017	
2331000974	SHANKAR	DIKhan	88.76	GPS KHANA SHARIF	Lundā Shārif	No. 25757-67 dated 09-11-2017	

TERMS & CONDITIONS

- The regularization will not be in favour of those, who have not taken over charge or has remained absent from duty or resigned from service and also not for those who are under disciplinary proceedings.
- Their services shall be governed by the Khyber Pakhtunkhwa Civil Servants Act, 1973, the Khyber Pakhtunkhwa (Appointment, Deputation, Posting & Transfer of Teachers, Lecturers, Instructors & Doctors) Regulatory Act, 2018 and such rules and regulations as may be issued from time to time by the government.
- Their pay shall be released subject to verification of academic documents/testimonials from the concerned Board/University by the District Education Officer Concerned.
- Their services shall be considered regular and they shall be eligible for pension/deduction of GP fund in terms of the Khyber Pakhtunkhwa Civil Servants Act, 1973 as amended in 2013.
- Their services are liable to termination on one month prior notice from either side. In case of resignation without notice, their one month pay/allowances shall be forfeited to the Government treasury.
- They shall possess the same qualification and experience required for a regular post.
- They shall have not resigned from their services or terminated from services on account of misconduct, inefficiency or any other ground before commencement of this ACT. The DDO concerned should ensure this condition before the draw of their pay as regular servants.
- Their regularization shall not affect the promotion quota of existing holders of posts in respective service cadres.
- The employees whose services are regularized under The Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2018 (Khyber Pakhtunkhwa Act No. 1 of 2018) or in the process of attaining service at the commencement of The Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2018 (Khyber Pakhtunkhwa Act No. 1 of 2018) shall rank junior to all civil servants belonging to the same service or cadre, in the case may be, who are in service on regular basis on the commencement of The Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2018 (Khyber Pakhtunkhwa Act No. 1 of 2018), and shall also rank junior to such other persons, if any, who, in pursuance of the recommendation of the Commission made before the commencement of this Act, are to be appointed in the respective service or cadre, irrespective of their actual date of appointment.
- Their seniority shall be determined on the basis of their continuous service in cadre, provided that if the date of continuous service in the case of two or more employees is the same, the employees older in age shall rank senior to the younger one.

Sd/-
 (ATTA ULLAH KHAN MINA KHEL)
 DISTRICT EDUCATION OFFICER
 (MALE) DERA ISMAIL KHAN

Order No. 8712-10760/Estt.(Primary)

Dated DIKhan the 10/03/2018

- Copy forwarded for information and necessary action to the:
- PS to the Secretary, to Govt. Khyber Pakhtunkhwa E&SE Department.
 - Director, Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar.
 - District Nazim, DIKhan.
 - Deputy Commissioner, DIKhan.
 - District Comptroller of Accounts, DIKhan.
 - Deputy District Education Officer (Male), DIKhan.
 - All Sub Divisional Education Officers (M) in District DIKhan.
 - All Assistant Sub Divisional Education Officers (M) Circles in District DIKhan.
 - All Head Teachers Concerned.
 - Teachers Concerned.
 - Master File.

DISTRICT EDUCATION OFFICER
 (MALE) DERA ISMAIL KHAN

M. Anwar Arif
 Advocate Supreme Court
 Dera Ismail Khan

GOVERNMENT OF KHYBER PAKHTUNKHWA
OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
DERA ISMAIL KHAN

17

Endst: No. 11728-1

Dated: D.I. Khan, the 04/1/06/2020

To

The Director
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar


Subject: GUIDANCE REGARDING SENIORITY LIST OF PST

Respected Sir,

It is stated for your kind information that a letter bearing No. 34832 dated 13/12/2019 on the subject cited above has been submitted to your good office but no guidance is provided in this regard till yet.

It is requested that seniority list of PST (NTS) is under process of updating now necessary guidance is required on the following points:

- 1- Whether the seniority list is updated according to merit score of the teachers or from their date of taking over charge and then on age.
- 2- In the year 2014 that appointments of PST (NTS) were made in two phases i.e. on May 2014 & December 2014. Whether these phases may be merged together and then determine their seniority on otherwise.


DISTRICT EDUCATION OFFICER
(MALE) DERA ISMAIL KHAN

Endst: No. 11729-331

Dated: 04/1/06/2020

Copy for information to the:-

1. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
2. Deputy District Education Officer (Male) DIKhan.
3. All the SDEO's (Male) in District Dera Ismail Khan.
4. PA to DEO (Male) DIKhan.

M. Anwar Awan
Advocate Supreme Court
D.I. Khan


DISTRICT EDUCATION OFFICER
(MALE) DERA ISMAIL KHAN

88

~~Ames~~ D-

18



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

No. 6416 If. No. Appeal D I Khan
Dated Peshawar the 24.6/2020.

To:

The District Education Officer (M)
D I Khan.

Subject: **GUIDANCE REGARDING SENIORITY LIST OF PST.**

Memo:-

I am directed to refer to your office letter No. 11728 dated 04.06.2020, on the subject cited above and to ask you to prepare seniority list of PSTs strictly in accordance with APT Rules 1989 and the KP Employees (Regularization of Service) Act 2018.

24/6/2020
Assistant Director (Estab :)
Elementary & Secondary Edu:
Khyber Pakhtunkhwa Peshawar

Copy forwarded to the:-

1. P.A to Director Elementary and Secondary Education, local office.

Assistant Director (Estab :)
Elementary & Secondary Edu:
Khyber Pakhtunkhwa Peshawar.

M. Anwar Awan
Supreme Court

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OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) DERA ISMAIL KHAN

**FINAL SENIORITY LIST OF PRIMARY SCHOOL TEACHERS (BPS 12) TO SENIOR PRIMARY SCHOOL TEACHERS (BPS 14)
(DIRECT APPOINTMENT, APPOINTED THROUGH DECEASED SON / MEDICAL BOARD QUOTA AND NTS)**

The committee consists of following members.

1. Mr. Muhammad Shafiq Principal, GCMHS No.1 D.I.Khan (Chairman)
2. Mr. Asim Saeed Principal, GHS Himmat D.I.Khan (Member)
3. Mr. Muhammad Danish Roman Khan SST-IT, GHS No.5 D.I.Khan (Member)

The committee after consultation with the respective ASDEOs of all the 11 circles and SDEOs of five tehsils of District D.I.Khan, compiled the seniority list. The committee gave ample time for correction and modification of the list.

The concerned SDEOs have given certificates that if any discrepancy appears in the list they will be held responsible.

The list was formulated according to the policy, rules and regulations given by the office/directorate.

SERIAL NO.	CNIC	NAME	FATHER NAME	DOMICILE	PRESENT PLACE OF POSTING	DATE OF BIRTH	DATE OF TAKING CHARGE	SCORE	TEHSIL	METHOD OF APPOINTMENT	REMARKS
	12101-8104636-5	SHAH JAHAN	GUL DAD	DIK	GMPS JALAL BORING	17 Mar 1961	01 Feb 1979		DIKHAN	DIRECT APPOINTMENT	
	12101-8000082-7	AZIZ ULLAH	SAAD ULLAH	DIK	GPS DIN PUR	20 May 1961	26 May 1982		DIKHAN	DIRECT APPOINTMENT	
	12103-1490966-3	MUSHTAQ AHMAD	RAB NAWAZ	DIK	GPS MITHA PUR KALAN	10 Apr 1962	16 Dec 1982		PAHARPUR	DIRECT APPOINTMENT	
	12103-1482132-1	ALLAH NAWAZ	MUHAMMAD NAWAZ	DIK	GPS KALA GORH	10 Sep 1962	17 Nov 1983		PAHARPUR	DIRECT APPOINTMENT	
	12013-3841194-3	GHANI-UR-REHMAN	SHER DIL	DIK	GPS NO.1 PAHARPUR	01 Nov 1962	20 Dec 1983		PAHARPUR	DIRECT APPOINTMENT	
	12101-0961741-7	ASEEM KHAN	AZAM KHAN	DIK	GPS GILOTT	01 May 1963	19 May 1984		DIKHAN	DIRECT APPOINTMENT	
	12101-0965650-3	MUHAMMAD RASHID	GHULAM JEELANI	DIK	GPS KOKAR GHARBI	10 Sep 1961	05 Sep 1984		DIKHAN	DIRECT APPOINTMENT	
	12102-2150050-7	ABDUL SAMAD KHAN	ABDUL GHAFAR	DIK	GPS BASTI BALOCHAN	28 Apr 1961	17 Oct 1984		DARABAN KALAN	DIRECT APPOINTMENT	
	12101-0939011-5	ABDUL RASHID	IMAM BAKHSH	DIK	GMPS HAZARA PAKKA	15 Oct 1963	17 Oct 1984		PAROVA	DIRECT APPOINTMENT	
10	12103-1501762-9	MUHAMMAD ABBAS SHAH	ABDUL HUSSAIN SHAH	DIK	GPS SAID ALIYAN	15 Apr 1965	17 Oct 1984		PAHARPUR	DIRECT APPOINTMENT	

M. AMIR AWAN
Advocate Supreme Court
D.I.Khan

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664	12201-4462117-7	ZAHIR HUSSAIN SHAH	SHARAF HUSSAIN SHAH	DIK	GPS RAKH CIVIL BAND KURAI	28 Feb 1985	17 May 2014	95.26	PAHARPUR	NTS	
665	12103-9453552-1	KIFAYAT ULLAH	HAMID ULLAH	DIK	GPS UMER KHÉL	16 Jan 1990	17 May 2014	95.24	PAHARPUR	NTS	
666	12101-1722236-1	MUHAMMAD NAEEM	GHULAM YASIN	DIK	GPS KOKAR GHARBI	02 Mar 1991	17 May 2014	95.03	DIKHAN	NTS	
668	12101-4119138-3	MUHAMMAD YASIR KHAN	ABDUS SALAM	DIK	GPS NO.1 POTAH	04 Jan 1986	05 Dec 2014	94.95	DIKHAN	NTS	
669	12101-0904054-7	MUHAMMAD IMRAN	MISRI KHAN	DIK	GPS RUKNOW	15 Oct 1992	05 Dec 2014	94.94	DIKHAN	NTS	
670	12102-4440069-9	M IMRAN KHAN	SANA ULLAH KHAN	DIK	GPS GARAH AZIK	18 Mar 1983	17 May 2014	94.92	DARABAN KALAN	NTS	
671	12102-5821325-7	SAFI ULLAH	GHULAM MUHAMMAD	DIK	GPS WANDA HORI	27 Jul 1987	17 May 2014	94.91	KULACHI	NTS	
672	12101-0917025-9	ABID HUSSAIN	GHULAM SARWAR	DIK	GPS NO 2 BUDH	25 Mar 1982	17 May 2014	94.81	DIKHAN	NTS	
673	12101-9669870-7	GUL ZAMAN	MUHAMMAD RAMZAN	DIK	GPS NO 1 BUDH	10 Dec 1986	17 May 2014	94.81	DIKHAN	NTS	
674	12101-0410026-1	HAMEED ULLAH	MALIK TAHIR	DIK	GPS BASTI ALI NO 1	08 Apr 1988	17 May 2014	94.65	PAROVA	NTS	
675	12102-6587973-1	BINYAMIN KHAN	ABDUL QAYYUM KHAN	DIK	GPS GARAH MOHABBAT	02 Feb 1992	17 May 2014	94.56	KULACHI	NTS	
676	12103-0496941-5	SIKANDAR KHAN	SHAH NAWAZ	DIK	GPS ATHOG SHUMALI	01 Mar 1983	17 May 2014	94.55	PAHARPUR	NTS	
677	12101-5670902-3	ZAFAR ULLAH	ALLAH BAKHSH	DIK	GPS MANDHRA SAIDAN	14 Jan 1991	05 Dec 2014	94.51	DIKHAN	NTS	
678	12103-7531994-3	ZAIGHAM ABBAS	ABDUL AZIZ	DIK	GPS KUCH WALA	08 Mar 1981	17 May 2014	94.49	PAHARPUR	NTS	
679	12103-3499460-9	IKRAM ULLAH KHAN	QUTAB DIN	DIK	GPS NORAY KHEL	07 Feb 1987	17 May 2014	94.48	PAHARPUR	NTS	
680	12101-7447830-1	RAZAQ AHMAD	AHMAD BAKHSH	DIK	GPS CHAH LAL WALA	10 Apr 1982	17 May 2014	94.47	DIKHAN	NTS	
681	12101-2698816-9	HARIB UR RAHMAN	SAIF UR REHMAN	DIK	GPS KIKRI MALE KHEL	22 Mar 1990	17 May 2014	94.42	KULACHI	NTS	
682	12102-9197199-3	SHAMS U ZAMAN	ABDUL MAJEED KHAN	DIK	GPS NO.2 CHAUDHWAN	19 Apr 1986	17 May 2014	94.31	DARABAN KALAN	NTS	
683	12104-6771223-7	SHAHID GHAFFAR	ABDUL GHAFAR KHAN	DIK	GPS BASTI BALOCHA	01 Jul 1986	17 May 2014	94.20	DARABAN KALAN	NTS	
684	12101-6656131-9	ASMAT ULLAH	GHULAM SUBHANI	DIK	GPS JHOKE GUMLA	06 Feb 1989	05 Dec 2014	94.19	PAROVA	NTS	
685	12101-0989303-3	WASI UL QUDDOS	HAJI ABDUL QADOOS	DIK	GPS LADHO KARLOO	24 Apr 1978	05 Dec 2014	94.11	PAROVA	NTS	
686	12101-8273727-3	MUHAMMAD AMIN	ELAHI BAKHSH	DIK	GPS NAWAB	20 Mar 1978	05 Dec 2014	94.04	DIKHAN	NTS	
687	12101-5952328-5	ZEESHAN FAKHAR	FAKHAR UD DIN	DIK	GPS DHAP CHABAK	28 Jul 1991	17 May 2014	94.03	DIKHAN	NTS	

AP. G. SINGH AMAR

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1194	12101-8047233-5	RISHI HANS	HEERA LAL	DIK	GPS NAI ABADI KOTLA SAIDAN	12 Jul 1996	05 May 2017	90.48	DIKHAN	NTS	
1195	12101-7464937-1	SHAFQAT ULLAH	MUHAMMAD AMEEN	DIK	GPS JEEWAYA SAHI	13 Aug 1988	27 Sep 2017	90.37	DIKHAN	NTS	
1196	12101-0970848-7	SHANKAR	MANNA LAAL	DIK	GPS KHANA SHARIF	04 Oct 1973	09 Nov 2017	88.76	PAROVA	NTS	
1197	12103-149344-1	SYED MUHAMMAD TAQI ZAIDI	SYED NASIR HUSSAIN ZAIDI	DIK	GPS AMIR SHAH	02 Feb 1977	22 Feb 2018		PAHARPUR	DECEASED SON / MEDICAL BOARD QUOTA	
1198	12101-7976492-5	MUHAMMAD SOHAIL	GHULAM FARID	DIK	GPS RATTA KULACHI	05 Mar 1980	22 Feb 2018		DIKHAN	DECEASED SON / MEDICAL BOARD QUOTA	
1199	12101-9408976-3	KHURAM SHEHZAD	MUHAMMAD IBRAHIM	DIK	GPS AHEER ABAD	01 Apr 1984	22 Feb 2018		DIKHAN	DECEASED SON / MEDICAL BOARD QUOTA	
1200	12101-8202352-1	ABDUR RASHID	ABDUR RAHIM	DIK	GPS GOMAL KHURD	31 Jan 1985	22 Feb 2018		DIKHAN	DECEASED SON / MEDICAL BOARD QUOTA	
1201	12101-0808292-3	AFTAB MOHAY UD DIN	MOHAMMAD ASLAM	DIK	GPS SHEIKH RAJU	02 Apr 1985	22 Feb 2018		DIKHAN	DECEASED SON / MEDICAL BOARD QUOTA	
1202	12101-5595268-1	MUHAMMAD ALI NUMAIR	SYED JAHANGIR ABBAS	DIK	G.P.S WANDA BALOCH KOKAR	21 Mar 1992	22 Feb 2018		DIKHAN	DECEASED SON / MEDICAL BOARD QUOTA	
1203	12102-5739990-3	IRFANULLAH	FATEH ULLAH	DIK	GPS NO.2 KOT ESA KHAN	04 Oct 1993	22 Feb 2018		CHODWAN	DECEASED SON / MEDICAL BOARD QUOTA	
1204	12101-5310377-9	ALI JAMSHED	JAMSHED AHMAD	DIK	G.P.S SHAIKH YOUSAF	13 Feb 1994	22 Feb 2018		DIKHAN	DECEASED SON / MEDICAL BOARD QUOTA	

CHAIRMAN: MUHAMMAD SHAFIQ _____

MEMBER 1: ASIM SAEED _____

MEMBER 2: MUHAMMAD DANISH ROOMAN _____

M. AWWAZ AWAZ
Advocate Supreme Court
Dikhan

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OFFICE OF THE
DISTRICT EDUCATION OFFICER (MALE)

DERA ISMAIL KHAN

Tell: 09669280128-09669280131

Email: emisdikhan@yahoo.com

22

Officer No. 435 /F-PST/DEO(M)

Dated DIKhan the 28/01/2021

To

The Director
Elementary & Secondary Education
Department Khyber Pakhtunkhwa Peshawar.

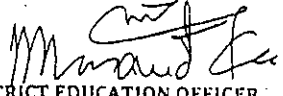
Subject: RESERVATION AGAINST THE SENIORITY LIST OF PST BS 12 (NTS 2014)

Memo:

It is submitted that some PSTs of district DIKhan have reservation over the seniority of list of PST (NTS) appointed on 17 May 2014 prepared on score basis vide your office No.6416/F-No. Appeal DIKhan dated Peshawar the 24 June 2020. Their reservations are as under:

1. PSTs were appointed in the 1st phase i.e. on 17/05/2014, whereas the deferred cases Teachers were appointed in the 2nd phase i.e. on 05/12/2014.
2. They have referred the Part-VI clause 17(a) of APT rules 1989 and clause 10 of the NTS teacher's regularization act of KP Assembly 2018, which emphasize the promotion will be based on date of 1st appointment (date of taking over charge) and then on age instead of score.
3. Some PSTs were appointed in the year 2017 & 2018 on regular basis on medical & deceased quota, they are given senior portion due to their regular appointment.
4. What will be position of promotees during year 2014 to 2018 who are working on regular basis?

It is requested that the necessary guidance from law department is required for permanent solution of this problem under the rules. The application along-with relevant documents are enclosed herewith for kind perusal please



DISTRICT EDUCATION OFFICER
(MALE) DERA ISMAIL KHAN

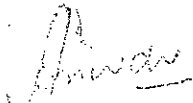
Encls. No. ___/F-PST

Dated DIKhan the ___/___/2021

Copy of above is forwarded for information to the:-

1. PS to Secretary E&SED Khyber Pakhtunkhwa Peshawar.
2. SDEUs (Male) Concerned in District DIKhan.
3. PA to DEO (Male) Dera Ismail Khan.
4. Office/Teachers Concerned.


DISTRICT EDUCATION OFFICER
(MALE) DERA ISMAIL KHAN


M. Anwar
Advocate Supreme Court
D.I.Khan

..... Better Copy.

OFFICE OF THE
DISTRICT EDUCATION OFFICER (MALE)
DERA ISMAIL KHAN
Tell; 0966-9280128-09669280131
Email; emisdikhan@yahoo.com

Endst; No. 435/F-PST/DEO(M) Dated DIKhan 08/01/2021

To,

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

SUBJECT:- RESERVATION AGAINST SENIORITY LIST OF PST BS 12 (NTS 2014).

Memo;

It is submitted that the some PST's of district DIKhan have reservation over the seniority of list of PST (NTS) appointed on 17 May 2014 prepared on score basis vide your office No. 6416/F.No.Appeal DIKhan dated Peshawar the 24 June 2020. Their reservation are as under:

1. PST's were appointed in the 1st phase i.e on 17/05/2014, whereas the deferred cases Teachers were appointed in the 2nd phase i.e on 05/12/2014.
2. They have referred the Part-VI clause 17(a) of APT rules 1989 and clause 10 of the NTS Teacher's regularization act of KP Assembly 2018, which emphasize the promotion will be based on date of 1st appointment (date of taking over charge) and then on age instead of score.
3. Some PSTs were appointed in the year 2017 & 2018 on regular basis on medical and deceased quota, they are given senior portion due to their regular appointment.
4. What will be position of promotes during year 2017 to 2018 who are working on regular basis?

It is requested that the necessary guidance from law department is required for permanent solution of the problem under the rules. The application along with relevant documents are enclosed herewith for kind perusal please.

District Education Officer
(Male) Dera Ismail Khan.

Dated No. ____/F-PST dated DIKhan the ____/____/2021

Copy of above is forwarded for information to the:

1. PS to Secretary E&SED Khyber Pakhtunkhwa Peshawar.
2. SDEOs(Male) Concerned in District DIKhan.
3. PA to DEO(Male) Dera Ismail Khan.
4. Office / Teachers Concerned.

District Education Officer
(Male) Dera Ismail Khan.

M. Anwar Awan
Advocate Supreme Court
D.I.Khan

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District Education Officer Dera Ismail Khan

To,
The D.E.O,
D. I. Khan.

Subject: Reservation against the promotion order of PST (BPS12) to SPST(Bps14).

Respected Sir,

Most respectfully, it's stated that the KP Department of education advertised for the post of PST(BPS12) in December.

After the qualification of the test and criteria, we were appointed to the above-mentioned posts on 17 May 2014, but those who were found deficiencies like age problem, degree clearance, and result awaiting, were appointed six months later on 5 December 2014, in the second phase.

Another interesting thing is that the difference between 1st and 2nd phases (seniors and juniors) of six months was also maintained in both cases: awarding increments and implementing permanency orders.

But when the promotion orders issued both seniors and juniors fall in one category and they promoted PSTs based on merit(NTS merit), which is a violation of KP assembly act 2018 and 1989 APT rule. As it is discussed in detail in the following line.

We put a humble request that as the case of promotion order of PSTs is concerned: KP assembly passed an act on Jan 8, 2018 and it's paragraph 4 part 2 states that seniority will be awarded to primary school teachers based on age and day of the appointment(a copy is attached with application).

*Received
04/11/21*

Anwar

M. Anwar Awan
Advocate Supreme Court
D.I.Khan

Office of 76
04/11/21
Diary No. _____

150

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This act was also ratified in the elementary and secondary education notification related to the promotion order which was issued on 16 Feb 2018 in paragraph 2 part 1 (a copy is attached with application).

In the light of this act DEO of D. I. Khan issued an order for permanency, the article 10 of this order also emphasize that promotion will be held based on age and day of appointment as the KP assembly has passed the act (a copy is attached with application).

On 04/06/2020 District Education Officer submitted a letter regarding guidelines about seniority and promotion of PSTs to Director Education Khyber Pakhtunkhwa.

Later on, 24/06/2020 Director Education in answer to the said letter stated that the "promotion will be awarded based on the 1989 APT rule and the 2018 KP assembly act." (copy of both is attached).

Article-17 of APT states that "in the case of persons appointed by initial recruitment, in accordance with the order of merit assigned by the Commission 48 (or as the case may be, the Departmental Selection Committee;) provided that persons selected for appointment to post in an earlier selection shall rank senior to the persons selected in a later selection; (a copy of which is attached).

Last but not the least, there are several paradoxes in the promotion orders of primary school teachers of NTS based 2014.

1st, the combined juniors, and seniors

and promoted them as a single badge but they were dealt differently in previous government activity (increment and permanency).

2nd, the promotion to the SSTs have been awarded on the basis of age while in case of PSTs. Here, rule is completely change.

3rd, it was clearly stated that promotions orders will be designed accordance to KP assembly act 2018 and 1989 APT rule but in practice they are disobeyed.

Therefore, we request in a humble manner that promotion orders should be redesigned according to KP act 2018 and 1989 APT rule.

Anwar
M. Anwar Awan
Advocate Supreme Court
D.I. Khan



Dated: 04/01/2021

Copy is forwarded for information and necessary action to:
Director E&ED KP

Secretary Education Khyber Pakhtunkhwa

0343-2066 989

- 1. صاحب سٹارٹ اپ فنڈ ایجنسی ہائیڈرو پاور
- 2. سید عزیز علی شاہ
- 3. سید عزیز علی شاہ
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M. A. M. Advocate Supreme Court
D.I. Khan

(15)

Annexure B

-4-

(27)



DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION
HYDERABAD DISTRICT, PUNJAB

Hyderabad, the 10/12/2021

The District Education Officer (D.E.O.)
Hyderabad.

Subject: **OBJECTION AGAINST THE SENIORITY LIST OF STUDIES II
(NCS-2011)**

Memo: I am directed to refer your office letter No. 43 dated 08.01.2021, on the subject
mentioned above and to ask you to deal the case at your own level being a competent authority.

[Signature]
Assistant Director (State)
Elementary & Secondary Edu.
Hyderabad District, Punjab.
10/12/2021

Copy forwarded to the:

1. P.A to Director Elementary and Secondary Education local office.

[Signature]
Assistant Director (State)
Elementary & Secondary Edu.
Hyderabad District, Punjab.
10/12/2021

[Signature]
M. Samar Awan
Additional Supreme Court
District

ASSISTANT DIRECTOR (STATE)
ELEMENTARY & SECONDARY EDUCATION
HYDERABAD DISTRICT, PUNJAB

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

No. _____/Appeal DIKhan
Date Peshawar the __/__/2021

To,

Th District Education Officer (M)
D.I.Khan.

**SUBJECT:- RESERVATION AGAINST THE SENIORITY LIST OF
PST BPS-12 (NTS 2014).**

Memo;

I am directed to refer your letter No. 435 dated 08/01/2021, as the subject cited above and to ask you to deal the case at you own being a competent authority.

**Assistant Director (Estab)
Elementary & Secondary Edu
Khyber Pakhtunkhwa, Peshawar.**

Copy forwarded to;

1. PA to Director Elementary and Secondary Education local office.

**Assistant Director (Estab)
Elementary & Secondary Edu
Khyber Pakhtunkhwa, Peshawar.**

M. Anwar Awian
**M. Anwar Awian
Advocate Supreme Court
D.I.Khan**

- H -

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To,

1. The District Education Officer (Male) D. I. Khan

Received
22/03/21
D. No # 5184
22/03/21
District Education Officer
(Male) D. I. Khan

Subject: Appeal against the Seniority/promotion order of PST (BPS-12) and PST (BPS-14)

Respected Sir,

Most respectfully, it is stated that District Education Officer D. I. KHAN advertised for the post of PSTs (BPS-12) in January 2014.

After the qualification of the test and eligibility criteria, we were appointed to the above-mentioned posts on 17 May 2014, but those who were found ineligible due to deficiencies like age problem, degree verification, and result awaiting, were appointed six months later on 5 December 2014, in the second phase.

Another interesting fact is that the difference between 1st and 2nd phases (seniors and juniors) of six months was also maintained in both cases: awarding increments and implementing permanency orders.

But when the Seniority/promotion orders issued both seniors and juniors merged in one category and the Seniority/promotion of PSTs (recruited through NTS) made on the basis of score, which is contrary to the 2018 act of KP assembly and 1989 APT rule (Annex "A" & "B").

So we humbly request you that as the case of Seniority/promotion order of PSTs is concerned:

Section 4(2) of KP Employees of E&SED (Appointment and Regularization of Services) Act states that: seniority of inter-se of those employees, whose services are regularized under this Act within the Cadre, shall be determined on the basis of their continuous service in Cadre, provided that if the date of continuous service in the case of two or more employees is same, the employee older in age shall rank senior to the younger one.

This act was also endorsed by the Elementary and Secondary Education Department notification related to the Seniority/promotion order which was issued on 16 Feb 2018 in paragraph 2 part 1 (annex "C").

In the light of this act DEO D. I. Khan issued an order for permanency on 10/03/2018, the article 10 of this order also emphasize that Seniority/promotion will be granted on the basis of date of appointment and age as the KP assembly has passed the act (annex "D").

M. Anwar
M. Anwar Anwar
Advocate Supreme Court
D.I. Khan

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On 04/06/2020 District Education Officer sought an advice regarding seniority and Seniority/promotion of PSTs to Director Education (E&SED) Khyber Pakhtunkhwa (annex "E")

Later on, 24/06/2020 Director Education in answer to the said letter stated that the "Seniority/promotion will be awarded based on the 1989 APT rule and the 2018 KP assembly act." (annex "F").

The sub section (4) of article (17) of CIVIL SERVANTS (APPOINTMENT, PROMOTION & TRANSFER) RULES, 1989 rules states that:

"The inter se-seniority of civil servants in a certain cadre to which promotion is made from different lower posts, carrying the same pay scale shall be determined from the date of regular appointment/promotion of the civil servants in the lower post.

Provided that if the date of regular appointment of two or more civil servants in the lower post is the same, the civil servant older in age, shall be treated senior."

Similarly, the seniority order list made by District Education Officer (DEO) Haripur, Khyber Pakhtunkhwa, is based on KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT, PROMOTION & TRANSFER) RULES, 1989 and THE KHYBER PAKHTUNKHWA EMPLOYEES (REGULARIZATION OF SERVICES) ACT, 2018.

Last but not the least, there are several paradoxes in the Seniority/promotion orders of primary school teachers of NTS based 2014.

First of all from serial number 01 to serial number 203 seniority awarded on the basis of date of appointment and age while from serial number 204 to onward seniority awarded on the basis of score(marks) achieved in initial test.

There are several omissions in the seniority list of PSTs of district D I Khan.

The District Education Officer merged the juniors and seniors and promoted them as a single badge but they were dealt differently in previous government activity (increment and permanency)

The Seniority/promotion of the SSTs in the entire province, weather recruited through Commission or NTS, have been awarded on the basis of date of 1st appointment i.e. date of taking over charge and then on age while in case of PSTs. Here, the rule was completely ignored.

M. Agha
M. Agha
Advocate
D.I. Khan

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It was clearly stated that Seniority/promotions orders will be designed accordance to "THE KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT, SENIORITY/PROMOTION & TRANSFER) RULES, 1989 and KP assembly act 2018 but in practice they are completely ignored.

Therefore, we humbly request you that Seniority/promotion orders should be cancelled & redesigned according to KP Assembly act 2018 and 1989 APT rule w. e. f. date of promotion order i.e. 08/12/2020.

We also have submitted the same application beforehand to your worthy office on dated: 04/01/2021.

Date: 15-03-2021

Yours obediently,

PSTs (List attached)
District: D. I. Khan

[Handwritten signature]

[Faint stamp]

Copy is forwarded for information and necessary action to:

Director E&SED KP

Secretary Education Khyber Pakhtunkhwa

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- 2. سربراہان
- 3. گوانٹان
- 4. فور پلان
- 5. فور چیمبر

- 1. سید اختر
- 2. سید عزیز
- 3. محمد ارمان
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M. Anwar Awan
Advocate Supreme Court
D.I. Khan

