


FORM OF ORDER SHEET

Court of _____

Case No.- 1644/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	18/11/2022	<p>The appeal of Mr, Sajid Awais presented today by Mr. Noor Muhammad Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on_____. Notices be issued to appellant and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR <i>ew</i></p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

SERVICE APPEAL 1644 /2022


SAJID AWAIS VS **EDUCATION DEPTT:**

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APPELLANT

THROUGH:


NOOR MUHAMMAD KHATTAK
ADVOCATE
SUPREME COURT OF PAKISTAN

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 16/114 /2022

Mr. Sajid Awais, SST (Bio/Chem:),
GHSS Mandori, District Kohat.

..... APPELLANT

VERSUS

- 1- The Government of Khyber Pakhtunkhwa, through Secretary Elementary and Secondary Education, Peshawar.
- 2- The Director Elementary and Secondary Education, Peshawar.
- 3- The District Education Officer (Male), Kohat.
- 4- Mr. Muhammad Abid, SST (Bio/Chem), GCHS Kohat.

.....RESPONDENTS

SERVICE APPEAL UNDER SECTION-4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE
IMPUGNED ACTION OF THE RESPONDENTS BY NOT
TRANSFERRING THE APPELLANT TO THE GCHS KOHAT AND
AGAINST THE IMPUGNED ACTION OF THE RESPONDENTS BY
REGRETTING THE DEPARTMENTAL APPEAL ON NO GOOD
GROUND

Respectfully SHEWETH:

FACTS:

Brief facts giving raise to the service appeal are as under:

- 1- That, appellant was appointed on the recommendation of DSC as SST (Chem/Bio) on contract basis on 09.05.2014 and was later regularized as SST (Chem/Bio) vide notification dated 16.03.2018 since which the appellant has been performing his duty as SST (Chem/Bio) in GHSS Mandoori (Kohat). Copies of the appointment order dated 09.05.2014 and regularization notification dated 16.03.2018 are attached as Annexure..... **A & B.**
- 2- That the private respondent Muhammad Abid was appointed against the Secondary School Teacher (SST Chem/Bio) in (BPS-16) school based on contract vide notification dated 11.12.2018. Copy of the notification dated 11.12.2018 is attached as Annexure **C.**
- 3- That it is worth mentioning here that the private respondent has been appointed on school based and on contract basis. According to the terms and conditions of appointment of the private respondent at serial 14 "***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". Copy of the terms and conditions is attached as Annexure..... **D.**

- 4- That recently Departmental Promotion Committee was held as a result of which some posts of SST(Bio/Chem) were vacated and the District Education Officer adjusted the private respondent from GHS Darmalak, Kohat to GCHS, Kohat vide notification dated 27.08.2022 till the arrival of regular incumbent. Copy of the transfer notification dated 27.08.2022 is attached as Annexure **E.**
- 5- That the appellant is residing in Togh bala, Kohat with his family and has to travel three hours daily from home to current duty station. Furthermore, the appellant has been working at the same station for eight long years.
- 6- The appellant filed departmental appeal dated 06.04.2022 to the principal for transferring the appellant to GCHS, Kohat. The principal forwarded the departmental appeal to the District Education Officer (M) Kohat but the same was not responded until the appellant filed a writ a petition in the Honorable Peshawar High Court which was disposed of vide order dated 18.10.2022 in following terms terms:- "this petition stands disposed of in terms that the respondents shall abide by the commitment so made at the bar and decide the petitioner's appeal within a period of three days from today." Copy of the departmental appeal dated 06.04.2022 and order dated 18.10.2022 are attached as Annexure **F & G.**
- 7- That the respondent department regretted the departmental appeal of the appellant vide appellate order dated 20.10.2022 on no good grounds. Copy of rejection letter is attached as Annexure **H.**
- 8- That, the appellant feeling highly aggrieved from the inaction of the respondent and having no other adequate remedy but to file the instant service appeal before this august Service Tribunal on the following grounds amongst others.

GROUND:

- A- That, the action of the respondents by rejecting the representation of the appellant on no good grounds is against the Law, facts, rules and material available on record.
- B- That appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the constitution of Islamic Republic of Pakistan 1973.

- C- That the treatment meted out to the appellant is highly discriminatory while not transferring the appellant to the Government Comprehensive High School, Kohat.
- D- That, the treatment meted out to the appellant is a clear violation of the Fundamental Rights of the appellant as enshrined in the Constitution of Pakistan 1973.
- E- That, act of the respondents is also a clear violation of Article-37 and 38 (e) of the Constitution of Islamic republic of Pakistan.
- F- That the appellant seeks permission to advance any other grounds and proofs at the time of hearing.

It is therefore, most humbly prayed that on acceptance of this service appeal, the impugned appellate order dated 20.10.2022 may very kindly be declared as illegal, unconstitutional, void and ineffective upon the rights of the appellant. The respondents may further please be directed to transfer the appellant from GCHS Mandoori, Kohat to GCHS Kohat. Any other remedy which this august Tribunal deems fit and has not been specifically prayed for, may also be awarded in favor of the appellant.

Dated: 18-11-22


APPELLANT

THROUGH:


NOOR MUHAMMAD KHATTAK


UMAR FAROOQ MOHMAND


WALEED ADNAN


MUHAMMAD AYUB
ADVOCATES

-4-

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

SERVICE APPEAL _____/2022

SAJID AWAIS

VS

GOVT OF KP & OTHERS

AFFIDAVIT

I Sajid Awais S/o Badshah gulR/Q Nandarka P/O Shakar darra, Tehsil and District Kohat, do hereby solemnly affirm that the contents of this **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.



DEPONENT

"A"-5-

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Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

PII No. 091-0210389, 0210938,

0210137, 0210957, 0210468

Fax: 091-0210936

E-mail: rafiq_kk851@yahoo.com



APPOINTMENT.

Consequent upon recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the post of Secondary School Teacher (SST Bio Chem) School based in NPS-16 (Rs. 10000-800-34000) @ Rs. 10000/- 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 :-

Abbottabad					
S#	Name	Father Name	Address	Score	Name of School
1	Ashiq Ahmed Khan	Aziz Ur Rehman	Chand Sattarary Nara Gippe Number in Abbottabad District Abbottabad CNIC No 13102-0538959-1	137.28	GIS Kankhal
2	Jamail Tahir Khan	Muhammad Tahir	House No 1174 Street No 4 Puna Kukul Road Abbottabad CNIC No 13101-2778928-3	137.25	GIS Beerungali
3	Ameesh Asad	Muhammad Asad	Atmullah Upper Village & P/O Mehr Kulan Tehsil & Dist. Abbottabad CNIC No 13101-0034842-9	133.79	GIS Chari Nourpur
4	Waqar Anwar	Muhammad Anwar	Mahallah Malik Pura Near Chungi No. 3, Sector No. 2, Post Office Khalabat Town Ship CNIC No 13101-2776581-1	125.74	GIS Chambir
5	Shahzad Akhtar	Abdul Wahed	Near Old Chungi No 04 College Road Havelian Tehsil CNIC No 13101-3183989-6	125.65	GIS Singal
6	Malik Shahid Hussain Anwar	Malik Ghulam Abulaziz Anwar	Mushahid Photo Studio Opposite To Zaman Hotel Main Bazar Havelian Dist. Abbottabad CNIC No 13101-3183989-7	125.62	GIS Sarni
7	Mirakhatar Ahmad	Qulzaman	Village Mula Qulad Post Office Havelian Tehsil Havelian CNIC No 13101-3183989-3	123.29	GIS Hunder Buhli
8	Yasir Iqbal	Muhammad Khan	Village Pathwal Post Office Sherwan District and Tehsil Abbottabad CNIC No 13101-0319000-0	119.01	GIS Sarni
9	Muhammad Anwar Javed Zahid Ahmad Khan	Muhammad Jawid	Near Abbad Super Store Garpu Bhal Town CNIC No 13101-0255206-1	123.71	GIS Malim
10	Zahid Ahmad Khan	Muhammad Iqbal Khan	House No 120 A Atmullah Nizami Lower Malik Pura CNIC No 13101-2776589-5	123.57	GIS Nurachi
11	Rashid	Abul Sattar	Village Bussori P/O Hajokote CNIC No 13101-0210938-1	123.52	GIS Malim
12	Zveshan Khan	Zurad Khan	House No 595 Sheikh Dehai Iqbal Road Supply Abbottabad CNIC No 13101-0049193-1	121.35	GIS Jambhal
13	Ahmad	Akbar Khan	Shop No M.C.A 72 Jinnah Road Abbottabad CNIC No 13101-0877791-1	120.53	GIS Naurai

Bannu

S N	Name	Father Name	Address	Score	Name of School
1	Abul Samad	Abdul Jamin	Fazal Rahman Mandi P/O Al Markeh E Islami CNIC No 11101-179063-1-1	141.2	GIS Jambhal
2	Muhammad Khalil Ullah Khan	Fazal Wahab Khan	Mandi Khel Bannu Bannu CNIC No 11101-0236951-9	136.51	GIS Mandi Khel Under 2nd

(Signature)

~~Bojid Anees~~

BETTER COPY

Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

APPOINTMENT.

Consequent upon the recommendation of the Departmental Selection Committee appointment of the following candidates are hereby ordered against the post of Secondary School Teacher (SST Bio Chem), (SST Maths Phy), (SST General) school based in BPS-16 (Rs.10000-800-34000) @Rs.10000/-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:-

ABBOTTABAD

SN	Name	Father Name	Address	Score	Name of School
1	Aftab Ahmad Khan	Aziz Ur Rehman	Chand Stationary Near gipge Number at Abbottabad CNIC No.13302-0538953-1	137.28	GHS Kanthiall
2	Junaid Tahir Khan	Muhammad Tahir	House No.111/4 Street NO.4 Pma Kakul Road Abbottabad CNIC No.13101-2778928-3	137.25	GHS Beerangall
3	Muneeb Afzal	Muhammad Afzal	Mohallah Upper Village & P/O Mehar Kalan Tehsil & District Abbottabad CNIC 13101-6034842-9	133.72	GHS Gharl Noorpur
4	Waqar Anwar	Abdul Waheed	Mohallah Malik Pura Near chungi NO.3 Sector No.2, Post Office Khalabut Township CNIC No. 13101-2776581-1	125.74	GHS Ghambir
5	Shahzad Akhtar	Abdul Waheed	Near Old Chungi NO.04 College Road Havelian Tehsil CNIC NO.13101-3183989-9	125.65	GHS Shrjat
6	Malik Shahid Hussain Awan	Malik Ghulam Murtaza Awan	Moshahid Photo State Opposite to Zaman Hotel Main Bazar Havelian Dist & Tehs Abbottabad CNIC NO.13101-2068755-7	125.52	GHS Stora
7	Mukhtar Ahmad	Gulzaman	Village Malra Gujrat Post Office Havelian Tehsil Havelian CNIC NO.13101-3633512-3	124.29	GHS Hadora Bandl
8	Yasir Iqbal	Muhammad Khan	Village Patheel Post Office sheerean District & Tehsil Abbottabad CNIC NO.13101-0389---	124.--	GHSS
9	Muhammad Aamir Javed	Muhammad Javed	Near Abbasi Super Store Gurga Bilal Town CNIC NO.13101-9255206-1	123.71	GHS Malsa
10	Ahmad Khan	Muhammad Iqbal Khan	House No.150 A Mohallah Nizami Tanveer Malik Pura CNIC 13101-7116053-5	123.55	GHS Nureela
11	Rashid	Abdus Sattar	Village Banseri PO CNIC NO.13101-0210--	123.59	GHS Manhu
12	Zeeshan Khan	Zardad Khan	House No.595 Sheikh Dehri Iqbal Road Supply Abbottabad CNIC NO. 13101-1944413-1	121.35	GHS Langrial
13	Ahmad	Akbar Khan	Shop NO.M.C.A 72 Jinnah Road Abbottabad CNIC No. 13101-0877731-1	120.53	GHS Namal

BANNU

SN	Name	Father Name	Address	Score	Name of School
1	Abbas Samad	Abdul Janan	Fazal Rahman Banda P/O Al Markez E Islami CNIC NO	141.2	GHS Jani Khel
2	Muhammad Khalil Ullah Khan	Fazal Wahab Khan	Mama Khel Banochi Bannu CNIC NO.11101-923635-1	136.51	GHS Suti killa Umer Zai

Appointment Order SST (Bio/ Chem) Male Adhoc

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14	Mir Khatam	Said Farooq Khan	Gdg College Number of Staff Hostel Room Number of Abbottabad CNIC No 13301-9575529-3	108.35	GIS Kupri Amazi
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Karak

S#	Name	Father Name	Address	Score	Name of School
1	Muhammad Yunas	Abdul Jalil	Village And Post Office Sabirabad Tehsil And Distt. CNIC No 14202-7117393-7	118.68	GIS Ghundi Shamshaki
2	Nasir Ullah	Amul Ullah	Amratullah General Store Near Habib Bank Ltd Tehsil District Gna Karak CNIC No 14202-6602600-3	136.7	GIS Tatal
3	Raza Ullah	Zarwar Jan	Room No 109 Hostel No 9 University Of Peshawar CNIC No 14202-9890821-7	135.56	GIS Wargh Banda
4	Muhammad Kamran Raza	Akhtar Raza	Tappi Kabuki Po Tehsil And District Karak CNIC No 14202-6997091-5	135.53	GIS Chindai Kherran
5	Tahir Iqbal	Hale Khan	Department Of Botany Kohat University Of Science And Technology CNIC No 14202-3917183-5	131.02	GIS Kupri

Kohat

S#	Name	Father Name	Address	Score	Name of School
1	Muhammad Zakir	Naseem Gul	Mohallah Gul Colony Village Togh Bala Post Office Togh Bala Tehsil Kohat District Kohat CNIC No 14301-5000011	143.21	GIS Chindai
2	Imam Shah	Shafi Khan	Abdul Jabbar Chah Lak Shari No 02 Kumbh Plaza Kohat CNIC No 14301-6119443-3	140.19	GIS Kial Shikhan
3	Habib Ullah	Abdul Ghaffar	170 Postal Code, Muhammad Ullah Post Office Tachi Tehsil Tachi CNIC No 14301-5100117-7	139.07	GIS Shamshaki
4	Zahoor Khan	Hachin Khan	Kohat Model College Old Passport Office Chakor Khat Kohat CNIC No 14301-6335687-7	127.811	GIS Nakhmal
5	Sajeed Gul	Razi Shah Gul	Chahri College Kohat Kpk CNIC No 14301-1068999-9	124.88	GIS Mahitaur
6	Muhammad Farid	Muhammad Gul	Village And P/O Shakar Dara Mohallah Ahmed Abad Distt Kohat Tehsil Tachi CNIC No 14301-1038828-3	119.07	GIS Dhand Sughori
7	Burhan Ud Din	Sajjad Khan	Attari Wali Akhbar Wali Po Govt. High School Akhbar Wali Po Kohat CNIC No 22401-7768954-1	117.73	GIS Landi Kuchhi
8	Muhammad Tariq Waheed	Abdul Waheed	Muhammad Tariq Waheed S/O Abdul Waheed Late Mohallah Langer Khat CNIC No 14301-5304499-9	117.49	GIS Summari Payan
9	Nasir Akhbar	Gul Akhbar	Gulshan Abad Near K.A.A Gate No 1 Street No 1 Peshawar Road Kohat CNIC No 14301-2031618-1	116.29	GIS Zinat Shikhi Allah Dad

Kohistan

S#	Name	Father Name	Address	Score	Name of School
1	Abdul Wahab	Abdul Qadir	170 Khushheed General Store Near Khati Masjid Ring Road CNIC No 13401-1301678-9	119.84	GIS Sakhawat
2	Sultana E Room	Abulallah	Distt Kohistan Tehsil Dassa Post Office Kumbh C/O Muslim Public School And College Kumbh CNIC No 13401-3703592-9	117.93	GIS Nakhmal
3	Saeed Ali	Iqbal Shah	Distt Battagram P/O Kumbh Teh Allai Principal Afzal P/O School CNIC No 13401-3311479-7	116.4	GIS Kitz Parah
4	Muhammad Iqbal	Gul Khan	C/O Gul Nain Khan (M), Thy Hospital Peshawar CNIC No 13402-7558640-0	116.61	GIS Mahlan Khat

(Handwritten signature)

Appointment Order SST (Bio/ Chem) Male Adhoc

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4	Fazal Wajid	Muhammad Yar	Village And Post Office Charbagh Mahallah Adabgher Cham District Suiat Kpk CNIC No 15602-1307962-3	133.71	GIS Dui
5	Shujat Ali Khan	Watan Farman	Institute Of Chemical Science Organic Lab C/O Zulfiqar Ali University Of Peshawar CNIC No 15602-1307962-3	133.07	GIS Ashorian
6	Eq Muhammad Khan	Rahim Gul	Village Dushiqran Post Office Maulpin (Ashraf Medical Store) Tehsil Behrain CNIC No 15602-9715015-5	132.89	GIS Dardpal
Rank					
Sr	Name	Father Name	Address	Score	Name of School
1	Muhammad ul Iqbal	Muhammad Hamza	Mahallah Haran Abdul Sheikh, Vansaf Road Near Kamal Khan CNIC No 12201-0110957-5	126.84	GIS Union Khat
2	Hizabullah	Inayat Ullah	Prasad Enter Prises Court Market Near Court Wapda (Complaint Office) CNIC No 12201-6935416-1	125.95	GIS Gora Bhatta
3	Muhammad Nawaz	Akbar Zaman	Golden Mahila Zone Prime Mobile Market Near Tank Ada, Deru Ismail Khan CNIC No 12201-6935416-1	127.58	GIS Mullaazai
4	Ishad Ahmad	Nawsher Ahmad	Room Number 66 Hostel Boys 1 In Kabul University Of Science And Technology CNIC No 12201-3936808-7	123.8	GIS Gora Shehbaz
5	Hisan Ullah	Sheikh Behram	Zafar Rewinding Shop Near Of Androni Masjid Mehsud Market Tank CNIC No 12201-9473404-9	122.97	GIS Tujari

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 w.e.f May 1st, 2014 to April 30th, 2015.
4. She should not be handed over charge if she exceeds 35 years or below 18 years of age. Age relaxation case may be submitted to competent authority.
5. Appointment is subject to the condition that the certificate/documents must be verified from the concerned authorities by the DEO (concerned); any one found producing bogus Certificate will be reported to the law enforcing agencies for further action.
6. His/her 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 to the effect by DEO (concerned) is issued that his/her certificates are verified.
8. He/She should join his post within 10 days of the issuance of this notification. In case of failure to join the post within 10 days of the issuance of this notification, his/her appointment will expire 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. He/she will be governed by such rules and regulations as may be issued from time to time by the Govt.
11. His/her services shall be terminated at any time, in case his performance is found unsatisfactory during his/her contract period. In case of misconduct, he/she shall be proceeded under the rules framed from time to time.
12. His/her appointment is made on School based. He/she will have to serve at the place of posting, and His/her service is not transferable to any other station.

Q

By: Director (Asst) Khayber Pakhtunkhwa Peshawar
Elementary and Secondary Education
Khayber Pakhtunkhwa Peshawar

- 1. Information for necessary action to the
- 2. Secretary Khayber Pakhtunkhwa Peshawar
- 3. District Education Officers, Concomit
- 4. District Accounts Officers, Concomit
- 5. District Clerks, Concomit
- 6. PS to the Secretary to Govt, Khayber Pakhtunkhwa Peshawar
- 7. PS to the Director, E&S, Khayber Pakhtunkhwa Peshawar
- 8. A/P/116

File No. S/A-13/SST/AdhwaZaput: Third Peshawar, 2019

(Muhammad Rafiq Khattak)
Director
Elementary and Secondary Education
Khayber Pakhtunkhwa Peshawar

We have handing over charge once again their document may be checked if they have not the required reference as per rules, they may not be handed over charge of the post.

Appointment in the SST (that from) Mr. A. Khan



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Appointment Order SST (Bio/ Chem) Male Adhoc

13. Before handing over charge once again their document may be checked if they have not the required relevant qualifications as per rules, they may not be handed over charge of the post.

(Muhammad Rafiq Khattak)

DIRECTOR

**Elementary & Secondary Education
Khyber Pakhtunkhwa.**

Endst. No.2068-75

Dated Peshawar the 30/01/2014

Kohat Male Regularization order Order SST 2018

Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

PH No. 091-9225339, 9225344,

Fax 091-9225343

Email: khattakfarid@gmail.com



"B"

NOTIFICATION.

Under the provision 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 in pursuance of the Govt. of Khyber Pakhtunkhwa Notification No: SO(S/F) E&SED/3-2/2018/SITT/Contract, Dated: 16-02-2018. the Services of the following Secondary School Teachers (SST Bio/Chem), (SST Maths /Physics), (SST General) appointed on Adhoc /Contract basis, are hereby regularized in BPS-16, on the SST posts in Teaching Cadre on the terms and conditions given below with effect from the date of their appointments.

(SST Bio Chem)

Sr	RollNo	Name	Permanent Address with CNIC No	Total Marks (Out of 200)	School	Appointment order No and dated	Extension order No and dated if any
1	38-10422	MUHAMMAD ZAKIR S/O NASEEM GUL	Vill. & P.O. Togh Bala Tehsil & District Kohat CNIC: 14301-2791098-1	143.23	GHSS Chorlaki	No. 2068-75 DI: 30-04-14	No 4913-20 DI: 28-04-17
2	38-10442	ZAHOOR KHAN S/O BASHIR KHAN	Moh: SPO Silandar Khan, Shenwan Jangle Khel Kohat, CNIC: 14301-6335687-7	127.88	GHS NAKBAND KOHAT	-do-	-do-
3	38-10507	SAJID AWAIS S/O BADSHAH GUL	Vill: Nandraga P.O: Shakardara Kohat CNIC: 14301-1968939-9	124.88	GHS Mandoran	-do-	-do-
4	38-10438	MUHAMMAD FARID S/O MUHAMMAD GUL	Vill & P.O Shakardara Ahmad Abad, Kohat CNIC: 14301-1028826-3	119.07	GHS Dhand Sagheri	-do-	-do-
5	16-10326	BURHAN UD DIN S/O SAJJAD KHAN	Village Shadi Khel, Kohat CNIC: 22401-7768954-1	117.73	GHSS Landi Kachai	-do-	-do-
6	38-10513	MUHAMMAD TARIQ WAHEED S/O ABDUL WAHEED	Moh: Hamid Abad P/O Shakardara, Tehsil & Dist: Kohat CNIC: 14301-5304443-9	117.49	GHS Summari Payan	-do-	-do-
7	38-10388	NOOR AKBAR S/O GUL AKBAR	Gulshan Abad, Near KDA Gate No:1 Kohat CNIC: 14301-2031618-1	116.29	GHS Zirat Sheikh Allan Dad	-do-	-do-
8	3810124	MUHAMMAD ISHAQ S/O GHULAM HABIB	Zawaki Banda Hangu Road Kohat CNIC:	114.42	GHS Barh	No. 4001-07 DI: 30-11-15	No. 6234-41 DI: 30-11-17
9	3810172	MUHAMMAD SADDIQUE S/O NIAZ BADSHAH	Khawasi Banda Jama Kohat CNIC:	114.13	GCOMHS Muslim Abad	-do-	-do-
10	3810050	IMRAN KHAN S/O ALLAUD DIN	Bahawal Nagar Pindi Road Kohat CNIC: 14101-8680469-1	109.32	GHS Tolang Jadeed	No 4001-07 DI: 30-11-15	-do-

ATTACHED

Kohat Male Regularization order Order SST 2018



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Sr	RollNo	Name	Permanent Address with CNIC No	Total Marks [Out of 200]	School	Appointment order No and dated	Extension order No and dated if any
		UDDIN QURESHI	7				
33	383000885	AAMIR RAHEEM S/O RAHIM KHAN	Moh: Muhammad Zainan, Shinwari Jungle Khel Kohat CNIC: 14301-9238512-9	143.82	GHS GHURZAI PAYAN	No. 3135-42 Dt: 18-04-17	NA
34	383000644	ZAIN UL ABIDIN S/O IFTIKHAR UD DIN	Moalla Bazeed Khel P.O Tappi Teh: And Distt: Kohat CNIC: 14301-3329052-7	140.31	GHS SUDAL	-do-	NA
35	383000868	WALAYAS KHAN S/O JAHAN KHAN	Assalam Medicose Store P.O Babri Mills Distt: Kohat CNIC: 14301-5642510-9	139.03	GHSS MUHAMMAD ZAI	-do-	NA
36	383000732	AFTAB AHMAD KHAN S/O TAJ ALI KHAN	Vill: Banda Fateh Khan Teh: Lachi Distt: Kohat CNIC: 14301-2722148-5	138.72	GHS MALGIN	-do-	NA
37	383000809	MUHAMMAD KAMRAN S/O MUHAMMAD SULAIMAN	Vill: And P.O Box Kandar CNIC: 14301-3297654-1	137.86	GHS TORA WARAI KACHAI	-do-	NA
38	383000618	ABDUL HAYAT S/O SAIF UR REHMAN	Suleman Talab Shah Pur Distt: And Teh: Kohat CNIC: 14301-7635431-9	137.25	GHS CHASHMA MITHA KHAN	-do-	NA
39	383000898	MUSADIQUE SHAH S/O KHALID SHAH	Vill: Zowaki Banda, Teh: & Distt: Kohat CNIC: 14301-1986027-7	137.16	GHS KHADIZAI	-do-	NA
40	383000677	KHALID IMRAN S/O SAEED SHAH	Shaheed Zeeshan Shafiq H.S.S Snakar Dara CNIC 14301-4678021-5	137.00	GHSS DHDAND SAGHRI	-do-	NA
41	383000598	MUHAMMAD AFRASIAB S/O SAADAT QAYYUM	Vill: And P.O Merozai Teh: e And District Kohat CNIC: 14301-7439457-7	135.63	GHSS LACHI	-do-	NA

(DISABLE QUOTA (M) SST)

Sr	RollNo	Name	Permanent Address with CNIC No	Total Marks [Out of 200]	School	Appointment order No and dated	Extension order No and dated if any
1	3820048	Shahzad Ahmad S/O MUGHAL BASHAH	Vill: Yaseen Abad, Jarra Teh: & Distt: Kohat CNIC: 14301-6771492-3	119.81	GHS Khadi Zai Kohat	No. 1691-98 Dt: 11-01-16	No. 4891-98 Dt: 30-12-16
2	3830312	SIBGHAT ULLAH S/O RAFI ULLAH	Village & P.O Choraki Kohat CNIC: 14301-1961390-1	104.57	GHS Zirat Sheikh Allah Dad	-do-	-do-
3	383000914	UMAIR KHAN S/O RAZAIC KHAN	Mohallah Pir Khel Gari Bahram Shah Jungle Khel Kohat CNIC: 14301-1091878-5	108.40	GHS Behzadi Chikarkot	No. 501-08 Dt: 02-06-17	NA

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 Servant Act, 1979, the Khyber Pakhtunkhwa (Appointment, Deputation, Posting and Transfer of Teachers, Lecturers, Instructors and Doctors) Regularity Act, 2011 and such rules and Regulations as may be issued from time to time by the Government.
- Their pay shall be released subject to the verification of academic and professional documents/ testimonials from the concerned boards/universities by the District Education Officers Concerned.

ATTESTED

-11-

13

Kohat Male Regularization order Order SST 2018

4. Their services will be considered regular and they shall be eligible for pension/ deduction of GP Fund in terms of the Khyber Pakhtunkhwa Civil Servant Act, 1973 as amended in 2013.
5. Their services are liable to termination on one month notice from either side. In case of resignation without notice, their one month pay/allowances shall be forfeited to the Government.
6. They shall possess the same qualification and experience required for the subject post on regular basis.
7. Their regularization shall not affect the promotion quota of the existing holders of posts in respective service cadre. They shall rank junior to all civil servants belonging to the same service or cadre, as 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 Khyber Pakhtunkhwa Public Service Commission made before the commencement of this Act, are to be appointed to the respective service or cadre, irrespective of their actual date of appointment.
8. Their seniority shall be determined on the basis of their continuous services in cadre, provided that if the date of continuous service in case of two or more employees is the same, the employee elder in age shall rank senior to the younger one.

(Farid Ahmad Khattak)

Director

Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Indst: No. 3/146 / File No. 2/A-14/SST/Adhoc/Apptt: Dated Peshawar the 16/2/03/2018.

Copy forwarded for information and necessary action to the: -

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Secretary Khyber Pakhtunkhwa Public Service Commission Peshawar.
3. District Education Officer (Male) Kohat.
4. District Accounts Officer Kohat
5. Official Concerned.
6. PS to the Secretary to Govt. Khyber Pakhtunkhwa E&SE Department.
7. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
8. M/File

Dy: Director (Estab)

Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

ATTESTED

APPOINTMENT

On receipt of recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the post of Secondary School Teacher (SST Bio Chem) (SST Maths Phy) (SST General) School based in BPS-10 (Rs. 15880-1-80-5-1200) @ Rs. 15880/- fixed plus usual allowances as admissible under the rules on ad hoc basis on Contract under the existing policy of the Provincial Government in Teaching Cadre on the terms and condition given below in effect from the date of their taking over charge.

(SST Bio Chem)

Sr.	Roll No	Name	NIC	Address	Academ. Mark	AV. Age	Total Marks	School Name
1	21100043	MUHAMMAD SALEEM	14301-0017590-5	VILLAGE AND PO MANDORI, TEHSIL LACHMI, DIST. KOHAT	59.93		114.93	He was appointed at GHS SHEWAKI, but he refused to join the post, hence his appointment order is withdrawn.
2	21100051	MUHAMMAD FAHIM	14301-0073636-7	VILLAGE AND PO PIR MANDORI, TEHSIL LACHMI, DIST. KOHAT	63.23		121.23	Shifted from GHS DARNALAKI to GHS JUDAL, DIST. KOHAT.
3	21100045	METAB ALAM	14301-0059911-9	DIST. KOHAT, TEHSIL LACHMI, AND PO MANDORI	57.57	56	113.57	Shifted from GHS JUDAL to GHS SHEWAKI.
4	21100044	Muhammad J. Sabir	14301-0062099-7	Sheep Catchers (un) Kohat, Dist. Kohat	72.50		107.50	GHS Darnalaki

(SST Maths Phy)

Sr.	Roll No	Name	NIC	Address	Academ. Mark	AV. Age	Total Marks	School Name
1	212000141	RIZWAN GUL	14301-0446400-8	VILLAGE AND PO DAWAN, DIST. KOHAT, OFFICE LACHMI, DIST. KOHAT	50.10		100.10	He was appointed at GHS KOT, but he refused to join the post, hence his appointment order is withdrawn.
2	212000134	ZOHAB HASSAN	14301-2186408-5	VILLAGE AND PO MUHAMMAD HASSAN, DIST. KOHAT, ROAD KOHAT	66.70	52	118.70	He was appointed at GHS BEHZADI, DIST. KOHAT, but he refused to join the post, hence his appointment order is withdrawn.
3	212000123	ZOHAB TARIQ	14301-0233292-5	VILLAGE AND PO DAWAN, DIST. KOHAT	50.50		100.50	He was appointed at GHS KHAWAJA, but he refused to join the post, hence his appointment order is withdrawn.
4	212000245	Muhammad Shujah Uddin	14301-0251811-7	VILLAGE AND PO DAWAN, DIST. KOHAT	57.52		107.52	GHS Behzadi, Kohat
5	212000174	Muhammad Wajid	14301-0029961-7	Village and PO DAWAN, DIST. KOHAT	57.08		107.08	GHS Kot
6	212000199	Muhammad Salim	14301-0370501-2	Village and PO DAWAN, DIST. KOHAT	57.79		107.79	GHS Khawaja

BETTER COPY

Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

APPOINTMENT.

Consequent upon the recommendation of the Departmental Selection Committee appointment of the following candidates are hereby ordered against the post of Secondary School Teacher (SST Bio Chem), (SST Maths Phy), (SST General) school based in BPS-16 (Rs.15880-1280-54280) @Rs.15880/-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:-

(SST Bio Chem)

SN	Roll No	Name	NIC	Address	Academic Marks	NTS Marks	Total Marks	School Name
1	2110 0012 2	Muhammad saleem	14301- 6017890-5	Village and PO Mandoori Tehs Lachi district Kohat	58.93	91	114.93	He was appointed at GHS Shewari, but refused to join hence his appointment order is withdraw.
2	2110 0051 4	Muhammad Fahim	14301- 3073638-7	Village and P/O Madoori Tehs and Lachi Dist: Kohat	63.23	58	121.23	Shifted from GHS DARMALAK to Ghs Sudai
3	2110 0045 9	AFTAB ALAM	14301- 3073638-7	Dist Kohat Tehs Lachi Village PO Mandoori	57.71	56	113.57	Shifted from GHS SUDAI to GHS Shewaki
4	2110 0044 7	Muhammad Abid	14301- 5620099-7	Noor Elahi Colony Bannu Road, Kohat	49.38	56	109.38	GHS Darmalak

(SST Maths Phy)

1	2120 0014 1	Rizwan GUI	1430 1- 8445 483- 3	Village Kamar Dhawo Tehsil and District Kohat,	59. 42	61	120.42	He was appointed at GHS KOT but refused to join hence his appointment order is withdraw
2	2120 0043 4	Zohaib Hassan	1430 1- 2186 408- 5	L.T COL RETD Dr Muhamamd Hassan Paracha Colony Pindi road kohat	66. 70	52	118.70	He was appointed at GHS GHS BEHZADI Chikerkot, but refused to join hence his appointment order is withdraw
3	2120 0012 4	Zohaib Tariq	1430 1- 7213 292- 5	Village	66. 50	59	124.50	He was appointed at GHS Khawaja Khel, but refused to join hence his appointment order is withdraw
4	2120 0024 5	Muhamamd Shujjah Ud Din	1430 1- 2518 1114 -4		61. 52	-	-	GHS Bohzadi Chakar kot
5	2120 0017 9	Muhamamd Waqas	1430 1- 1229 357- 1	Village PO Biliang Kohat	57. 68	48. 20	115.88	GHS KOT
6	2120 0039 9	Muhamamd Sulaiman	1430 1- 0370 931- 43		58. 79	5-	--.79	GHSS USTERZAI PAYAN

ATTESTED

PERMITS & CONDITIONS

Sl. No.	Roll No.	Name	NIC	Address	Academic Marks	NTS Marks	Total Marks	School Name
1	219000761	IRFAN RAZA	1100107511199	RAZAN ENGLISH ACADEMY SMHHR KOHAT	50.79	50	100.79	GHS NOB KOHAT

SST General (Minority Quota)

Sl. No.	Roll No.	Name	NIC	Address	Academic Marks	NTS Marks	Total Marks	School Name
2	230002710	MUHAMMAD ALI	1100186299503	Talwager P.O. Tansil Kohat	54.42	55	109.42	GSZSHSS Shakerdara Kohat
	214000752	AZMAT GULFAN	1100269036149	Light PO. Light District Kohat	50.99	62	112.99	GHS Showki Kohat

SST General (Disable Quota)

Sl. No.	Roll No.	Name	NIC	Address	Academic Marks	NTS Marks	Total Marks	School Name
1	214000171	SHAHZAD HUSSAN	110018460895	Mohani Daboka PO Shikdaha Kohat	47.99	80	127.99	GSZSHSS Shakerdara Kohat
2	210001500	USMAN AKIL	1100192915767	Wing & PO Billing Kohat	62.32	67	129.32	GHS Tolaj Jaded Kohat
3	21000196	MUHAMMAD M. SALMAN M. BANI	1100107173065	KOT FARWAR PINDI KOT DISTRICT KOHAT	72.51	72	144.51	Shikdaha to GHS Shikdaha to GHS Kohat
4	214000278	ASIM NAZIR	1100101614127	GARDEN MASJID WALI GELI KOHAT CITY	54.17	61	115.17	Shikdaha from GHS LANDI KACHARI GMS Jabbi
5	21000518	HUSSAN ARBAS	110017561839	KOZ MERTI VILAGE MID KOHAT DISTRICT KOHAT	70.49	66	136.49	HU was appointed in GMS JABBI, he refused to join the post, hence his appointment order is withdrawn.
6	21000022	ZEEHAN	110014299076	QUIRAT PO QUIRAT KOHAT	60.55	64	124.55	HU was appointed in GMS QUIRAT, but he refused to join the post, hence his appointment order is withdrawn.



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SST (GENERAL)

S. N.	Roll No	Name	NIC	Address	Academic Marks	NTS Marks	Total Marks	School Name
	214000928	ZEESHAN	14302-4259797-5	Mohallah Bazar SERI Gujrat	46.55	87	133.55	He was appointed at GHS Tolanj Jadood, but he refuses to join the post so his appointment is withdrawn
	214000518	KAUSAR ABBAS	14301-7996183-9	Kooz Malath Village and PO Usterzal Payan	70.40	60.44	130.84	He was appointed at GHS Jabbi, He refused to join the post, hence his order is withdrawn
	214000576	ASIM NAZIR	14301-0161412-7	Garden Colony Masjid Wali Gall Kohat City	54.17	81	135.17	Shifted from GHSS Landi Kachal to GMS Jabbi
	214000495	MUHAMMAD ARSALAN AKBAR	14301-3717336-5	Village Bahader KOT Rawal Pindi Road Dist Kohat	72.51	70	144.51	Shifted from GHSS Jabbi
	214000606	USMAN AFRIDI	14301-9281676-7	Village & PO Billang Kohat	65.32	68	123.32	GHS Tolanj Jadeed
	214000171	SHAHZAD HASSAN	14301-8416089-5	Mohallah Darboka PO Shakardara Kohat	47.99	80	127.99	GSZSHSS Shakardara

SST GENERAL (DISABLE QUOTA)

S. N	Roll No	Name	NIC	Address	Academic Marks	NTS Marks	Total Marks	School Name
1	214000794	AZMAT SULTAN	14302-5903514-9	VILL Tehsil Lachii PO Lachi, District Kohat	53.99	62	115.99	GHS Showeki Kohat
2	2930002270	Muhamamd Ali	14301-8628959-3	Tarwa Bara, P/O & Tehsil Lachi District Kohat	54.42	55	100.42	GSZSHSS Skhardara Kohat

SST GENERAL (MINORITY QUOTA)

S. N	Roll No	Name	NIC	Address	Academic Marks	NTS Marks	Total Marks	School Name
1	214000761	IRFAN ULLAH	14301-0175111-9	Raza English Academy Sinhhir Kohat	50.79	50	100.79	GHS No.3 Kohat

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 wef 20th September, 2018 to 19th September, 2019.
4. He should not be handed over charge if he exceeds 35 years or below 19 years of age. Age relaxation case may be submitted to competent authority.
5. If any candidate is over age less than two years, their upper age limit less than two years is hereby relaxed.
6. If any meritorious candidate is deprived from appointment by this order and competent authority accepted his appeal, the appointment order of the low merit candidate will be withdrawn and adjustment order will be reviewed, according to merit.
7. Appointment is subject to the condition that the certificate/documents must be verified from the concerned authorities by the DEO (concerned) anyone found producing bogus Certificate will be reported to the law enforcing agencies for further action.

-14-

Kohat Male Appointment Order SSR Adhoc

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.

Pay will not be drawn until and unless a certificate to the effect by DFO (concerned) is issued that his certificates are verified.

He should join his post within 15 days of the issuance of this notification. In case of failure to join the post within 15 days of the issuance of this notification, his appointment will expire automatically and no subsequent appeal etc shall be entertained.

The candidate concerned should produce Health & Age certificate duly signed by Medical Superintendent concerned before taking over charge.

He will be governed by the rules and regulations in the field and as may be issued from time to time by the Govt.

His contract shall be discontinued at any time, in case his performance is found unsatisfactory.

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.

Before handing over charge once again their document may be checked if they have not the required relevant qualifications as per rules, they may not be handed over charge of the post.

(Hafiz Dr. Muhammad Ibrahim)

Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

3688-89

Encl. No. ~~3688~~ / File No. 17/SS1/Adhoc/Appt/2018 Dated Peshawar the 11/12/2018

- 1. Copy forwarded for information and necessary action to the
- 1. Accountant General, Khyber Pakhtunkhwa Peshawar.
- 2. Secretary Khyber Pakhtunkhwa Public Service Commission Peshawar.
- 3. District Education Officer (Male) concerned.
- 4. District Accounts Officer Concerned.
- 5. Official Concerned.
- 6. PS to the Secretary to Govt. Khyber Pakhtunkhwa ESSS Department.
- 7. PA to the Director ESSS Khyber Pakhtunkhwa Peshawar.
- 8. M/ file.

(Signature)
Deputy Director (D.S. 6)
Elementary & Secondary Education
Khyber Pakhtunkhwa

TESTED

BETTER COPY

8. His services are liable to termination on one months' notice from either side. In case of resignation without notice his one month pay/allowances shall be forfeited to the Government.
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11. The candidate concerned should produce Health & Age certificate duly signed by Medical Superintendent concerned before taking over charge.
12. He will be governed by the rules and regulations in the field and as may be issued from time to time by the Govt.
13. His contract shall be discontinued at any time, in case his performance is found unsatisfactory.
14. 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.
15. Before handing over charge once again their document maybe checked if they have not the required relevant qualifications as per rules, they may be handed over charge of the post.

(HAFIZ DR. MUHAMMAD IBRAHIM)

DIRECTOR

**Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar**

Endst. No. 3688-89

Dated Peshawar 19/12/2018

TERMS & CONDITIONS

NO TANDA etc is allowed.

Charge reports should be submitted to all concerned in duplicate.

Appointment is purely on temporary & contract basis initially for one year w.e.f. 20th September 2018 to 19th September, 2019.

He should not be handed over charge if he exceeds 35 years or below 19 years of age. Age relaxation case may be submitted to competent authority.

If any candidate is over age less than two years, their upper age limit less than two years is hereby relaxed.

If any meritorious candidate is deprived from appointment by this order and the competent authority accepted his appeal, the appointment order of the low merit candidate will be withdrawn and adjustment order will be reviewed according to merit.

Appointment is subject to the condition that the certificate/documents must be verified from the concerned authorities by the D.E.O (concerned) and one found producing bogus Certificate will be penalized to the full extent as per the rules.

ATTESTED

Kohat Male Appointment Order SST Adhoc

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.

Pay will not be drawn until and unless a certificate to the effect by D.E.O (concerned) is issued that his certificates are verified.

He should join his post within 15 days of the issuance of this notification. In case of failure to join the post within 15 days of the issuance of this notification, his appointment will expire automatically and no subsequent appeal etc shall be entertained.

The candidate concerned should produce Health & Age certificate duly signed by Medical Superintendent concerned before taking over charge.

He will be governed by the rules and regulations in the field and as may be issued from time to time by the Govt.

His contract shall be discontinued at any time, in case his performance is found unsatisfactory.

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.

Before handing over charge once again their document may be checked if they have not the required relevant qualifications as per rules, they may not be handed over charge of the post.

(Hafiz Dr. Muhammad Ibrahim)

Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

3688-89

Radst: No. ~~3688-89~~ / File No. 1 / SST/Adhoc/Appl./2018 Dated Peshawar the 11/11/2018

Copy forwarded for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Secretary Khyber Pakhtunkhwa Public Service Commission Peshawar.
3. District Education Officer (Male) concerned.
4. District Accounts Officer Concerned.
5. Official Concerned.
6. PS to the Secretary to Govt. Khyber Pakhtunkhwa E&SE Department.
7. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
8. M/File.

[Signature]
Deputy Director (E&SE)
Elementary & Secondary Education
Khyber Pakhtunkhwa

TERMS & CONDITIONS

16. NO TA/DA etc is allowed.
17. Charge reports should be submitted to all concerned in duplicate.
18. Appointment is purely on temporary & contract basis initially for one year wef 20th Septembe, 2018 to 19th September, 2019.
19. He should not be handed over charge if he exceeds 35 years or below 19 years of age. Age relaxation case may be submitted to competent authority.
20. If any candidate is over age less than two years, their upper age limit less than two years is hereby relaxed.
21. If any meritorious candidate is derived from appointment by this order and competent authority accepted his appeal, the appointment order of the low merit candidate will be withdrawn and adjustment order will be reviewed, according to merit.
22. Appointment is subject to the condition that the certificate/documents must be verified from the concerned authorities by the DEO (concerned) anyone found producing bogus Certificate will be reported to the law enforcing agencies for further action.
23. His services are liable to termination on one months' notice from either side. In case of resignation without notice his one month pay/allowances shall be forfeited to the Government.
24. Pay will not be drawn until and unless a certificate to the effect by DEO (concerned) is issued that his certificates are verified.
25. He should join his post within 15 days of the issuance of this notification. In case of failure to join the post within 15 days of the issuance of this notification, his appointment will expire automatically and no subsequent appeal etc shall be entertained.
26. The candidate concerned should produce Health & Age certificate duly signed by Medical Superintendent concerned before taking over charge.
27. He will be governed by the rules and regulations in the field and as may be issued from time to time by the Govt.
28. His contract shall be discontinued at any time, in case his performance is found unsatisfactory.
29. 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.
30. Before handing over charge once again their document maybe checked if they have not the required relevant qualifications as per rules, they may be handed over charge of the post.

(HAFIZ DR. MUHAMMAD IBRAHIM)

DIRECTOR

Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst. No. 3688-89

Dated Peshawar 19/12/2018



-16- "F"
OFFICE OF THE DISTRICT
EDUCATION OFFICER (MALE)
KOHAT
Ph & Fax : 0922-9260294

NOTIFICATION

The competent authority is pleased to adjust the following SST(s) in schools noted against each on vacant posts of SST(s) on stop gap arrangement till the arrival of regular incumbent with immediate effect.

S.No	Name and Designation	From	To	Remarks
1.	Mr. Muhammad Abid SST (B/C)	GHS Darmalak, Kohat	GCHS, Kohat	A.V.P
2.	Mr. Muhammad Mohsin SST (G)	GHSS Dhoda, Kohat	GCHS, Kohat	A.V.P

District Education Officer
(Male) Kohat

Endst; No. 4518-24 Dated Kohat the 27/08/2022

Copy of the above is forwarded to the :-

1. PA to Director (E & SE) Department KPK, Peshawar with regard his directions on 26/08/2022.
2. District Comptroller of Accounts, Kohat.
3. District Mentoring Officer, Kohat.
4. DEMIS local section, Kohat.
5. Principal / Headmaster concerned.
6. Official concerned.
7. Office Copy.

Dy. District Education Officer
(Male) Kohat

ATTESTED

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-17-

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14

The District Education Officer (Male),

Kohat.

Subject: REQUEST FOR TRANSFER

Sir,

I have the honour to state a few lines for your kind consideration and favourable action.

I am working as SST (Chem/Bio) in GHSS Mandoori (Kohat) since May 9, 2014. Recently a meeting of Departmental Promotion Committee was held as a result some posts of SST (Chem/Bio) are likely to be vacated in Govt. Comprehensive High School Kohat.

I am residing in Togh Bala, Kohat with my family and my current duty station is miles away from my home, for which I have to travel 3 hours daily.

Sir, I have almost completed 8 years in the current school and have applied a number of times for transfer before. It is kindly requested that I may please be transferred to the said school.

DEO Kohat
Please advise on top priority
Thanks best

the application is based on fact and is forwarded to DEO (m) Kohat for favourable action pl

Yours Obediently,

Sajid Awaiz

SST (Chem/Bio)

Dated: 06-04-2022

Mobile: 0333-9625743

Encl no. 10397

Date: 13-4-2022

Principal
GHSS Mandoori
Kohat

Principal

Forwarded to the

D.E.O (M) Kohat with the remarks that an S.S.T (Bio/Chem) is likely to become vacant in near future and the undersigned has no objection, if the applicant's transfer (P.T.O)

SOC (P)
Please get
proof of

Asst
29/6

ATTACHED

-26-

VAKALATNAMA
BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

APPEAL NO: _____ OF 20__

Sajid Anwar

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Education Deptt.

(RESPONDENT)
(DEFENDANT)

I/We (Appellant)

Do hereby appoint and constitute **Noor Mohammad Khattak Advocate Supreme Court** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.


Dated. 19 / 11 / 2022



CLIENT

ACCEPTED

NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT
(BC-10-0853)
(15401-0705985-5)


UMAR FAROOQ MOHMAND


WALEED ADNAN

&


MUHAMMAD AYUB
ADVOCATES

OFFICE:
Flat No. (TF) 291*-292 3rd Floor,
Deans Trade Centre, Peshawar Cantt.
(0311-9314232)

~~Handwritten scribble~~

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18-



IN THE PESHAWAR HIGH COURT PESHAWAR

Writ Petition No. _____ /2022

Mr. Sajid Awais, SST (Bio/Chem:),
GHSS manddori, District Kohat.

..... PETITIONER

VERSUS

- 1- The Government of Khyber Pakhtunkhwa, through Secretary Elementary and Secondary Education, Peshawar.
- 2- The Director Elementary and Secondary Education, Peshawar.
- 3- The District Education Officer (Male), Kohat.
- 4- Mr. Muhammad Abid, SST (Bio/Chem:), District Kohat.

..... RESPONDENTS

**WRIT PETITION UNDER ARTICLE 199 OF THE
CONSTITUTION OF ISLAMIC REPUBLIC OF
PAKISTAN 1973 AS AMENDED UP TO DATE**

Respectfully SHEWETH:

FACTS:

*Brief facts giving raise to the instant writ petition
are as under:*

- 1- That, the petitioner is the Law abiding, Peaceful & bona fide resident of District Kohat and living with his family within the local jurisdiction of this Honorable Court. Copy of the CNIC attached as ANNEXURE..... **A.**
- 2- That, petitioner has been performing is duty as SST (Chem/Bio) In GHHS Mandoori (Kohat) since 09.05.2014. Copy of the appointment order is attached as Annexure **B.**
- 3- That the petitioner was regularized as SST (Chem/Bio) vide notification dated 16.03.2018. Copy of notification dated 16.03.2018 is attached as Annexure..... **C.**
- 4- That the private respondent Muhammad Abid was appointed against the Secondary School Teacher (SST Chem/Bio) in (BPS-16) school based on contract basis vide notification dated 11.12.2018. Copy of the notification dated 11.12.2018 is attached as Annexure **D.**

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Peshawar High Court

That it is worth mentioning that private respondent has been appointed on school based and on contract basis. According to terms and conditions of appointment of the private respondent at serial 14 "***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.***" Copy of the terms and conditions is attached as Annexure..... **E.**

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- 6- That recently Departmental Promotion Committee was held as a result of which some posts of SST(Bio/Chem) were vacated and the District Education Officer adjusted the private respondent from GHS Darmalak, Kohat to GCHS, Kohat vide notification dated 27.08.2022 till the arrival of regular incumbent. Copy of the transfer notification dated 27.08.2022 is attached as Annexure F.
- 7- That the petitioner is residing in Togh bala, Kohat with his family and have to travel three hours daily from home to current duty station. The petitioner has been working at the same station for eight long years.
- 8- The petitioner filed departmental appeal dated 06.04.2022 to the principal to transfer the petitioner to GCHS, Kohat. The principal forwarded the departmental appeal to District Education Officer (M) Kohat but the same has not been responded till date. Copy of the departmental appeal dated 06.04.2022 is attached as AnnexureG.
- 9- That, petitioner feeling highly aggrieved from the inaction of the respondent and having no other adequate remedy but to file the instant writ petition before this Honorable Court on the following grounds amongst other inter alia.

GROUND:

- A- That, the action and inaction of the respondents by not deciding the representation of the appellant through speaking order which is against the Law, fact, rules and material available on record.
- B- That petitioner has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the constitution of Islamic Republic of Pakistan 1973.
- C- That the treatment meted out to the petitioner is highly discriminatory while not transferring the petitioner to the school i.e. Government Comprehensive High School, Kohat.
- D- That, the treatment meted out to the petitioner is a clear violation of the Fundamental Rights of the petitioner as enshrined in the Constitution of Pakistan 1973.
- E- That, act of the respondents is also a clear violation of Article-37 and 38 (e) of the Constitution of Islamic republic of Pakistan.

- F- That the appellate authority is bound in light of clause XIV of the transfer/posting policy to decide the departmental appeal

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of the petitioner one way or the other. Copy of the policy is attached as annexure H.

G- That the petitioner seeks permission to advance any other grounds and proofs at the time of hearing.

It is therefore, most humbly prayed that on acceptance of this writ petition the inaction of the respondents by not deciding the representation of the appellant through speaking order may very kindly be declare as illegal, unconstitutional, void and ineffective upon the rights of the petitioner. That the respondents may please further be directed to decide the departmental appeal of the petitioner strictly in accordance with law.

Any other remedy which this august Court deems fit and has not been specifically asked for, may also be awarded in favor of the petitioner.

Dated: 14/9/2022

PETITIONER



SAJID AWAIS

THROUGH:

NOOR MUHAMMAD KHATTAK

UMAR FAROOQ MOHAMMAD

WALEED ADNAN

MUHAMMAD AYUB

VERIFICATION:

It is verified that no other such like writ petition has earlier been filed between the parties.

ATTESTED
EXAMINER
Peshawar High Court

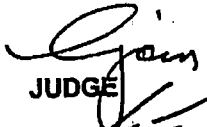
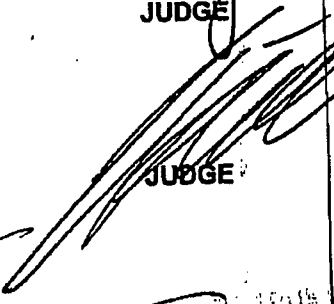
DEPONENT

LIST OF BOOKS:

1. Constitution of Pakistan
2. Any other Case law as per need.

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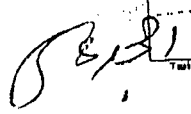
PESHAWAR HIGH COURT PESHAWAR
ORDER SHEET

Date of Order or Proceedings	Order or other Proceedings with Signature of Judge or that of parties or counsel where necessary
1	2
18.10.2022	<p><u>WP No. 3664-P/2022 with IR.</u></p> <p>Present: Mr. Umar Farooq Mohmand, advocate for the petitioner.</p> <p>Mr. Muhammad Inam Yousafzai, Addl. AG for the respondents alongwith Mohtasinbillah, Secretary Education and Muhammad Sheraz DEO (Male) Kohat.</p> <p>*****</p> <p><u>LAL JAN KHATTAK, J.-</u> The learned Addl. AG alongwith the respondents commits that the petitioner's appeal pending before the respondent No.3 would be decided within a period of three days from today to which the former did not press this petition any more.</p> <p>2. In view of the above, this petition stands disposed of in terms that the respondents shall abide by the commit so made at the bar and decide the petitioner's appeal within a period of three days from today.</p> <p style="text-align: right;">  JUDGE </p> <p style="text-align: right;">  JUDGE </p>

No. _____
 Date of Presentation of application _____
 No. of Pages _____
 Petitioning fee _____
 Date of _____

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 19.10.22

19 OCT 2022



OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KOHAT

No: 6663 / Transfer file SST/Estab Dated Kohat the 21/10/2022

To

Mr. Sajid Awais SST (Bio/Chem)
Govt Higher Secondary School Mandoori
Kohat

-22- "H"

Subject: **REQUEST FOR TRANSFER**

Reference your application on the subject cited above and Writ Petition No. 3664-P/2022 Peshawar High Court Peshawar with pray "That on acceptance of this writ petition the inaction of the respondent by not deciding the representation of the appellant through speaking order may very kindly be declare as illegal, unconstitutional, void and ineffective upon the right of the petitioner. That the respondents may please further be directed the departmental appeal of the petitioner strictly in accordance with law".

The Honourable Peshawar High Court Peshawar is pleased to treat the writ petition as representation to the Respondent No: 3 District Education Officer (Male) Kohat with directions to decide the appeal within a period of 03 days from today to which the former did not press this petition any more.

Your applications for transfer from Govt Higher Secondary School Mandoori Kohat to GCHS Kohat received to this office on 11/06/2022 vide Dairy No. 2275.

The post availability certificate granted by the Principal Govt Comp: High School Kohat with the remarks that "an SST (B/C) is likely to become vacant in near future and the undersigned has no objection if the applicant has transferred to this school as and when the post becomes vacant".

While processing your case a delegation of elders containing PTC members of village Mandoori visited the office of the undersigned and expressed their concerns/ reservations over the transfer of you i.e. Mr. Sajid Awais SST (Bio Chem), further more they also submitted a written application duly signed by all of them, which contains that there is only SST Bio Chem teacher i.e. you Mr. Sajid Awais available for teaching of science subject at secondary level in the said school and in case of transfer of the said teacher without providing any suitable substitute, the students of 9th & 10th class will badly suffer. They made a robust request for denying the transfer of any teacher from GHSS Mandoori Kohat without providing the suitable substitute. In addition, they also warned of the dire consequences in case their reservations/concerns are not addressed and stated that they will held responsible the office of the District Education officer (Male) Kohat for the same.


Keeping in view the above stated facts, ground realities and available official record pertaining to your application for your transfer GHSS Mandoori Kohat to Govt Comp: High School Kohat, is found devoid of merit and material substance, Hence the same is hereby regretted in larger interest of all stakeholders


DISTRICT EDUCATION OFFICER
(MALE) KOHAT

Endst No: _____

Copy forwarded to the:-

1. Addl Registrar Peshawar High Court Peshawar w/r to the judgment/order sheet dated 18.10.2022 in WP No: 3664-P/2022
2. Addl Advocate General Mr. Muhammad Inam Yousafzai office of Advocate General Khyber Pakhtunkhwa Peshawar High Court Peshawar.
3. PA to Secretary to Government of Khyber Pakhtunkhwa Elementary & Secondary Education Peshawar.
4. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
5. Office Copy.


DISTRICT EDUCATION OFFICER
(MALE) KOHAT

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"9"



GOVERNMENT OF NWFP
ESTABLISHMENT & ADMINISTRATION
DEPARTMENT
(Regulation Wing)

POSTING / TRANSFER POLICY OF THE PROVINCIAL GOVERNMENT

- i) All the posting/transfers shall be strictly in public interest and shall not be abused/misused to victimize the Government servants
- ii) All Government servants are prohibited to exert political, Administrative or any other pressures upon the posting/transfer authorities for seeking posing/transfers of their choice and against the public interest.
- iii) All contract Government employees appointed against specific posts, can not be posted against any other post.
- iv) The normal tenure of posting shall be three years subject to the condition that for the officers/officials posted in unattractive areas the tenure shall be two years and for the hard areas the tenure shall be one year. The unattractive and hard areas will be notified by the Government.
- v) { }
- vi) While making postings/transfer from settled areas to FATA and vice-versa, specific approval of Governor, NWFP needs to be obtained
²While making postings/transfers of officers/officials up to BS-17, from settled areas to FATA and vice-versa approval of the Chief Secretary NWFP needs to be obtained. Whereas, in case of posting/transfer of officers in BS-18 and above, from settled areas to FATA and vice versa, specific approval of the Governor NWFP shall be obtained.
- vi (a) All Officers/officials selected against Zone-I/FATA quota in the Provincial Services should compulsorily serve in FATA for atleast eighteen months in each grade. This should start from senior most scales/grades downwards in each scale/grade of each cadre.
- vii) Officers may be posted on executive/administrative posts in the Districts of their domicile except District Coordination Officers (D.C.Os) and DPOs/Superintendent of Police (SP). Similarly Deputy Superintendent of Police (DSP) shall not be posted at a place where the Police Station (Thaana) of his area/residence is situated.
- viii) No posting/transfers of the officer's/officials on detailment basis shall be made.
- ix) Regarding the posting of husband/wife, both in Provincial services, efforts where possible would be made to post such persons at one station subject to the public interest.
- x) All the posting/transferring authorities may facilitate the posting/transfer of the unmarried female government Servants at the station of the residence of their parents.

Para-1(v) regarding months of March and July for posting/transfer and authorities for relaxation of ban deleted vide letter No: SOR-VI (E&AD) 1-4/2008/Vol-VI, dated 3-6-2008. Consequently authorities competent under the NWFP Government Rules of Business, 1985, District Government Rules of Business 2001, Posting/Transfer Policy and other rules facilitate here



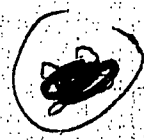
- xi) Officers/officials except DCOs and DPOs/SPs who are due to retire within one year may be posted on their option on posts in the Districts of their domicile and be allowed to serve there till the retirement
DCOs and DPOs who are due to retire in the near future may also be posted in the District of their domicile subject to the condition that such posting would be against non-administrative posts of equivalent scales;
- xii) In terms of Rule-17(1) and (2) read with Schedule-III of the NWFP Government Rules of Business 1985, transfer of officers shown in column 1 of the following table shall be made by the authorities shown against each officer in column 2 thereof:

Outside the Secretariat		
1.	Officers of the all Pakistan Unified Group i.e. DMG, PSP including Provincial Police Officers in BPS-18 and above.	Chief Secretary in consultation with Establishment Department and Department concerned with the approval of the Chief Minister.
2.	Other officers in BPS-17 and above to be posted against scheduled posts, or posts normally held by the APUG, PCS(EG) and PCS(SG).	-do-
3.	Heads of Attached Departments and other Officers in B-19 & above in all the Departments.	-do-
In the Secretariat		
1.	Secretaries	Chief Secretary with the approval of the Chief Minister.
2.	Other Officers of and above the rank of Section Officers: a) Within the Same Department b) Within the Secretariat from one Department to another.	Secretary of the Department concerned. Chief secretary/Secretary Establishment.
3.	Officials up to the rank of Superintendent: a) Within the same Department b) To and from an Attached Department c) Within the Secretariat from one Department to another	Secretary of the Department concerned. Secretary of the Dept in consultation with Head of Attached Department concerned. Secretary (Establishment)

- xiii) While considering posting/transfer proposals all the concerned authorities shall keep in mind the following:
 - a) To ensure the posting of proper persons on proper posts, the Performance Evaluation Report/annual confidential reports, past and present record of service, performance on post held presently and in the past and general reputation with focus on the integrity of the concerned officers/officials be considered.
 - b) Tenure on present post shall also be taken into consideration and the posting/transfers shall be in the best public interest.

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xiv) Government servants including District Govt. employees feeling aggrieved due to the orders of posting/transfer authorities may seek remedy from the next higher authority / the appointing authority as the case may be through an appeal to be submitted within seven days of the receipt of such orders. Such appeal shall be disposed of within fifteen days. The option of appeal against posting/ transfer orders could be exercised only in the following cases.

- i) Pre-mature posing/transfer or posting transfer in violation of the provisions of this policy.
- ii) Serious and grave personal (humanitarian) grounds.

2. To streamline the postings/transfers in the District Government and to remove any irritant/confusions in this regard the provision of Rule 25 of the North West Frontier Province District Government Rules of Business 2001 read with schedule - IV thereof is referred. As per schedule-IV the posting/transferring authorities for the officers/officials shown against each are as under:-

S. No.	Officers	Authority
1.	Posting of District Coordination Officer and Executive District Officer in a District.	Provincial Government.
2.	Posting of District Police Officer.	Provincial Government
3.	Other Officers in BPS-17 and above posted in the District.	Provincial Government
4.	Official in BPS-16 and below	Executive District Officer in consultation with District Coordination Officer.

3. As per Rule 25(2) of the Rules mentioned above the District Coordination Department shall consult the Government if it is proposed to:

- a) Transfer the holder of a tenure post before the completion of his tenure or extend the period of his tenure.
- b) Require an officer to hold charge of more than one post for a period exceeding two months.

4. I am further directed to request that the above noted policy may be strictly observed /implemented.

All concerned are requested to ensure that tenures of the concerned officers/officials are invariably mentioned in summaries submitted to the Competent Authorities for Posting/Transfer.

(Authority: Letter No: SOR-VI/E&AD/1-4/2003 dated 24-6-2003).

It has been decided by the Provincial Government that posting/transfer orders of all the officers up to BS-19 except Heads of Attached Departments irrespective of grades will be notified by the concerned Administrative Departments with prior approval of the Competent Authority obtained on the Summary. The Notifications/orders should be issued as per specimen given below for guidance.

All posting/transfer orders of BS-20 and above and Heads of Attached Departments (HAD) shall be issued by the Establishment Department and the Administrative Departments shall send approved Summaries to E&A Department for issuance of

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ISLAMABAD