2001.2021

Kabir Ullah Khattak learned Additional Advocate General alongwith Hamid Salim Law Officer, Hayat Khan Assistant Director and Abdul Wahid ADEO for respondents present.

Vide detailed judgment of today of this Tribunal placed on file of connected service appeal No.1014/2019 tilted Mst. Ishrat Vs. Education Department, the impugned orders stand set aside and the appellant is reinstated in service with direction to the Department to conduct proper inquiry. They shall investigate the issue through a proper inquiry reaching to a logical conclusion to find out the real culprits who maneuvered to make it possible and thereafter, the fate of appellant be decided in the light of the said inquiry. The respondents shall conclude the proceedings within 90 days after receipt of this judgment. The issue of back benefits shall be subject to the outcome of inquiry. With no order as to costs. File be consigned to the record room.

Announced. 20.01.2021

(Atiq-ur-Rehman Wazir) Member (E) Rozina Rehman) Member (J)

09.12.2020 Appellant present through counsel.

Muhammad Jan, learned Deputy District Attorney alongwith Hamid Salim Law Officer, Fahim Ullah Law Officer and Murtaza Superintendent for respondents present.

File to come up alongwith connected appeal No.1014/2019, on 12.01.2021 for before D.B.

(Atiq ur Rehman Wazir) Member (E) (Rozina Rehman) Member (J)

12.01.2021

Appellant with counsel present.

Kabir Ullah Khattak learned Additional Advocate General alongwith Hamid Salim Law Officer for respondents present.

File to come up alongwith connected appeal No.1014/2019 on 20.01.2021 before D.B.

(Atiq ur Rehman Wazir)

Member (E)

(Rozina Rehman) Member (J)

Due to summer vacations case to come up for the same on 15.00.2020 before D.B.

..15.10.2020

Mr. Khalid Khan Mohmand, Advocate, for appellant is present. Mr. Muhammad Jan, Deputy District Attorney alongwith representative of the department Mr. Hazrat Shah, Section Officer, are also present.

Learned counsel submitted that his senior has proceeded to Dar-ul-Qaza Mingora bench of the Hon'ble Peshawar High Court, Peshawar, and cannot attend the Tribunal today. Requested for adjournment. Adjourned to 17.11.2020 on which to come up for arguments before D.B.

(Atiq-ur-Rehman Wazir) Member (Executive)

(Muhammad Jamal Khan) Member (Judicial)

17.11.2020

Appellant present through counsel.

Muhammad Jan, learned Deputy District Attorney alongwith Hamid Saleem Law Officer for respondents present.

To come up alongwith connected file No.1014/2019, on 09.12.2020 before D.B.

(Atiq ur Rehman Wazir)

Member (E)

(Rozina Rehman) Member (J)

31.03.2020

Due to public holiday on account of COVID-19, the case is adjourned to 23.06.2020 for the same. To come up for the same as before S.B.

Reader

23.06.2020

Counsel for the appellant present. Mr. Kabir Ullah Khattak learned Additional Advocate General alongwith Mr. Muhammad Irfan Assistant, representative of respondents No.1 & 2 present and submitted reply on behalf of the said respondents.

Muhsin Hassan Khan present and submitted authority letter on behalf of respondent No.3 with a request for another adjournment; adjourned but on cost of Rs.2000/-. To come up for written reply/comments of respondent No.3, on 22.07.2020 before S.B

Member

22.07.2020

Appellant himself is present. Mr. Kabirullah Khattak, Additional AG alongwith Mr. Mohsin, Litigation Officer on behalf of respondent No. 3 are also present.

Joint para-wise comments on behalf of respondents No. 1 & 2 have already been submitted while representative of respondent No. 3 submitted written reply today which is placed on record. Representative of respondent No. 3 also paid Rs. 2000/- as per previous order sheet dated 23.06.2020 which is handed over to appellant and receipt thereof also obtained from the appellant, which is placed on record. File to come up for arguments on 12.08.2020 before D.B. The appellant may submit rejoinder within a fortnight, if so advised.

(MUHAMMAD JAMAL KHAN) MEMBER 10.02.2020

Learned counsel for the appellant present. Written reply not submitted. M/S Irfan Ali Assistant (for respondents No.1 & 2) and Mehtab Gul Law Officer (for respondent No.3) present. Representatives of respondents requested for a short adjournment to furnish reply. Granted. To come up for written reply/comments on 24.02.2020 before S.B.

Member

24.02.2020

Junior to counsel for the appellant present. Mr. Kabirullah Khattak, Addl. AG alongwith Hayat Khan, AD and Mehtab Gul, Law Officer for the respondents present. Respondents still seek time to submit reply/comments. Last chance is granted. To come up for written reply/comments on 12.03.2020.

Hussain Shah) Member

12.03.2020

Counsel for the appellant and Mr. Kabirullah Khattak, Additional AG alongwith M/S Hayat, Assistant Director on behalf of respondents No. 1 & 2 and Iftikhar Bangash on behalf of respondent No. 3 present. Written reply on behalf of respondents not submitted despite last chance. Both the representatives of the department seek further time to furnish written reply/comments. Last chance is extended to 31.03.2020 for written reply/comments before S.B.

(MUHAMMAD ÁMIN KHAN KUNDI) MEMBER 19.12.2019

Junior to counsel for the appellant and Addl. AG alongwith Hayat Khan, A.D for the respondents present.

Representative of respondents seeks further time to furnish reply/comments. Adjourned to 08.01.2020 on which date the requisite reply/comments shall positively be submitted.

Chairman

08.01.2020

Junior to counsel for the appellant and Addl. AG alongwith Irfanullah, Assistant for respondents No. 1 & 2 present. Nemo for respondent No. 3.

Representative of respondents No. 1 & 2 seeks time. Fresh notice be issued to respondent No. 3. To come up for written reply/comments on 24.01.2020 before S.B.

Chairman

24.01.2020

Junior to counsel for the appellant and Addl. AG alongwith Hayat Khan, A.D for the respondents present.

Representative of the respondents seeks short adjournment for submission of reply/comments. Adjourned to 10.02.2020 on which date the requisite reply/comments shall positively be furnished.

Chairman

06.09.2019

Appellant VAprisited

khss Fee

Counsel for the appellant present.

Contends that through notification dated 04.04.2019 the respondent No. 2/Director Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar "disowned" the appointment/ adjustment notification of the appellant ostensibly on the ground that at the time of initial appointment the appellant had provided fake/bogus documents. Even the appointment order itself was not genuine. It was argued that while dispensing with the service of appellant the respondents did not resort to mandatory departmental proceedings and the appellant was not provided with any opportunity of putting forth his defence. The respondents did not care to issue any show cause notice nor a proper/regular enquiry was conducted before issuing of impugned notification.

In view of available record and arguments of learned counsel, instant appeal is admitted for regular hearing subject to all just exceptions. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 18.11.2019 before S.B.

Chairman

18.11.2019

Junior to counsel for the appellant and Addl. AG alongwith Hamid Saleem Law Officer for the respondents present.

Representative of the respondents seeks time to furnish written reply/comments. Adjourned to 19.12.2019 on which date the requisite reply/comments shall positively be submitted.

Chairman

Form- A FORM OF ORDER SHEET

Court of	
Case No	972/ 2019

	Case No	9/2/ 2019
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	25/07/2019	The appeal of Mr. Muhammad Tariq presented today by Mr. Aminur-Rehman Yousafzai Advocate may be entered in the Institution Register
- -		and put up to the Worthy Chairman for proper order please. REGISTRAR
2-	16/02/19	This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>obloging</u>
		CHAIRMAN
	·	

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

Muhammad Tariq	Appellant
V E R S U S	
Govt of Khyber Pakhtunkhwa & 02 others	?espondents

INDEX

S.No.	Description of documents	Annex	Pages
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5.	CV	"B"	9 -
6.	Educational Testimonials	"C"	10-14
. 7.	. Advertisement dated: 26.01.2009		15-1 9
8.	. Appointment Notification dated: 05.03.2012		20-21
9.	Adjustment order dated: 05.03.2013 alongwith Charge report	"F"	22-23
10.	Impugned Notification dated: 04.04.2019 Cony	"G"	24
11.	Departmental Appeal dated: 16.04.2019 alongwith diary/dispatch number with date	"H"	25-2,6
12.	Wakalatnama		9.7

Appellant Through

Amin ur Rehman Yusufzai

Sajjad Mehs

&

Dated: 18.07.2019

Khalid Khan Advocates, Peshawar, 3-A, Park Avenue, Bhettani Plaza, University Town, Peshawar

Cell No.0321-9022964, 0333-9981464



BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR PESHAWAR PESHAWAR PESHAWAR

Service Appeal No. 1042

Muhammad Tariq S/O Sher Muhammad, Ex-SST (Gen),
R/O Mohalla Adda, Village P/O Lund Khwar Tehsil & District Takht Bhai
District Mardan

....V E R S U S....

- 1. Govt of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Civil Secretariat Peshawar.
- 2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.

SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL ACT, 1974, READ WITH ALL ENABLING PROVISIONS OF LAW, GOVERNING THE SUBJECT, AGAINST:

Filedto-day Registrar NOTIFICATION ENDORSEMENT NO. 5740-45, DATED: 04.04.2019 OF RESPONDENT NO.2, VIDE WHICH APPOINTMENT NOTIFICATION DATED: 09.01.2013 ALONGWITH ADJUSTMENT ORDER DATED: 22.01.2013, OF THE APPELLANT, HAS UNILATERALLY BEEN DISOWNED.

PRAYER-IN-APPEAL:

On Acceptance of Instant Appeal, the Impugned Notification dated 04.04.2019 of Respondent No.2 alongwith Pre & Post Proceedings thereto, may be declared as Illegal, Unlawful, without Lawful Authority, void-ab-initio and of no legal effect, Hence, be set at naught and appellant may be reinstated in service with all back benefits, in the best interest of justice and equity.

Respectfully Sheweth;

- That appellant is law abiding peaceful citizen of Pakistan and permanent resident of Mardan. (Copy of CNIC, is attached as Annexure "A")
- 2. That appellant obtained Master degree, in year of 2011 from Alkhair University and having passed M.ED & B.Ed degree courses from Allama Iqbal Open University Islamabad & Alkhair University respectively

(Copies of CV and Educational Testimonials, are attached as Annexure "B" &"C", respectively)

3. That respondent No.3, invited applications for numerous vacant positions of SETs/SSTs (BPS-16), vide Advertisement No. 01/2009, dated: 26.01.2009.

(Copy of Advertisement dated: 26.01.2009, is attached as Annexure "D")

(2)

- 4. That appellant, being qualified, applied for one of the aforementioned advertised posts of \$ST(Sci) (BPS-16) and gone through the entire process of selection successfully, eventually he, on the recommendation of KP PSC, was appointed as \$ST (Sci) BPS-16, on regular basis, vide Notification Endorsement No. 1705-12/File No.2/A-14/SST: Gen(M)/PSC/Apptt: dated: 09.01.2013.
 (Copy of Appointment Notification dated: 09.01.2013 is attached as Annexure "E")
- That appellant was subsequently adjusted in Govt High School Inzar Peti, Tribal District Orakzai i.e. against vacant Post, vide Order dated: 22.01.2013
 (Copy of Adjustment order dated: 07.03.2012, alongwith Charge report is attached as Annexure "F")
- 6. That appellant was performing duty with zeal, devotion and outmost satisfaction of the superiors, however he has unilaterally been shuntout from service, vide impugned Notification dated: 04.04.2019 by respondent No.2, without due process and following the law/rules governing the subject.
 (Copies of Impugned Notification dated: 04.04.2019, is attached as Annexure "G")
- 7. That appellant preferred departmental appeal dated: 16.04.2019 to respondent No.1 which was received vide Diary No. 1001 dated: 16.04.2019, though the statutory period of 03 months has been elapsed, but the authority did not consider the same, one way or the other.
 (Copy of Departmental Appeal dated: 16.04.2019 alongwith diary/dispatch number with date, is attached as Annexure "H")
- 8. That appellant, being aggrieved of impugned notification dated: 04.04.2019 and not considering his departmental appeal by respondent No.1, approaches this Hon'ble Tribunal, inter-alia, on the following grounds:

GROUNDS:

- A. That impugned Notification dated: 04.04.2019 of respondent No.2 is against the law and facts available on file, hence, untenable.
- B. That the appellant has neither been treated in accordance with law nor he has been provided equal protection of law, rather he has not been provided fair opportunity to defend himself, as enshrined in Article-10A of the Constitution of Islamic Republic of Pakistan 1973, hence the respondent department acted without jurisdiction.
- C. That neither regular enquiry was conducted into the guilt of the appellant nor he has been served with mandatory Show Cause Notice, hence, condemned unheard, which attracts doctrine of audi-alterm-partem.
- D. That appellant being qualified was appointed after due process of law and fulfilment of all legal/codal formalities, however shunt-out from service with a single stroke of pen, without care and caution of its legal consequences, which has caused grave miscarriage of justice.

3

E. That appellant has served the department with zeal, devotion and to the best of his abilities, without affording a single opportunity of complaint, either to the students or their parents or to the superiors, regarding performance of official duties, therefore, the following amongst plethora of Judgments of the apex Court will be attracted.

I. 2011 SCMR 1581

"Appointment order found to be bogus/fake/irregular Validity Such charge was vague, nonspecific and did not show any lapse on part of employee or commission of any fraud by him or non-possessing of requisite qualification by him or his appointment to be made by an incompetent officer Department had not found performance of employee to be unsatisfactory Impugned order was set aside in circumstances"

II. 2004 SCMR 303

"Appointment of Civil Servants were made by Competent Authority. If prescribed procedure was not followed by the Concerned Authority the Civil Servants could not be blamed for what was to be performed and done by the Competent Authority. Supreme Court noted it with concern that in case the Civil Servants were to be removed then the same would amount to hitting them hard creating problems for the society at large considering each of the Civil Servants being the bread earner of his family. Appointing authorities had been acting mechanically without application of mind, therefore, the Civil Servant could not be made to suffer for whimsical and mechanical acts of the authorities."

III. 2016 SCMR 1299

"The solution we have come out is simple, let them continue, if they besides the certificates or diplomas, issued by the council, possesses the requisite or equivalent qualification. Let them all also continue who improve their qualification even thereafter. Those who could not improve their qualification up till now should improve it within a period of one year, which could be reckoned from the date of commencement of the next available academic session of the respective program."

IV. 2010 PLD SC 483

"Principle of Audi-alterm-Partem was always deemed to be imbedded in the statute and even if there was no such express provision, it would be deemed to be one of the parts of the statute, because no adverse action can be taken against a person without providing right of hearing to him"

F. That any other grounds, with the permission of this Hon'ble Tribunal, will be taken at the time of arguments.

It is, therefore, most humbly prayed that on acceptance of Instant Appeal, the Impugned Notification dated 04.04.2019 of respondent No.2 alongwith Pre and Post proceedings thereto, may be declared as Illegal, Unlawful, without Lawful Authority, void-abinitio and of no legal effect, hence be set at naught and appellant

4)

may be reinstated in service with all back benefits, in the best interest of justice and equity.

Any other relief, not specifically prayed for and deemed appropriate by this Honourable Tribunal in circumstances of the case may also be granted.

Appellant Through

Amin ur Rehman Yusufza

Sajjad Mehsud

Khalid Khan

&

Abdul Samad Khan

Advocates, Peshawar, 3-A, Park Avenue, Bhettani Plaza, University Town, Peshawar

Cell No.0321-9022964, 0333-9981464

PESHAWAR

VERIFICATION:

Dated: 18.07.2019

Verified on oath that the content of the instant Service Appeal is true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Hon'ble Tribunal.

Deponen



BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

	C.M No/2019
	Service Appeal No/2019
Muhammad Tariq	Appellant
V E R S U S	10 0 0 0
Govt of Khyber Pakhtunkhwa & 02 others	Respondents

APPLICATION FOR STATUS-QUO TILL FINAL DECISION OF THE TITLED SERVICE APPEAL

Respectfully Sheweths -

Dated: 18.07.2019

- 1. That the titled appeal has been filed today wherein no date has yet been fixed for hearing.
- 2. That facts and grounds of the titled appeal may please be considered as integral part and parcel of instant applicant.
- 3. That valuable rights of applicant are involved into the matter and if the subject relief has not been granted he will suffer irreparable loss.
- 4. That applicant has got good prima facie case in his favour and is very much sanguine of its success. Moreover, balance of convenience also lies in his favor.
- 5. That there is no legal bar to grant the subject relief, rather grant of status quo will prevent miscarriage of justice to be occasioned.

It is therefore, most humbly prayed that on acceptance of instant application, Status-quo may please be ordered to be maintained till final decision of the titled appeal, so as to secure the ends of justice.

Appellant

Through

Amin ur Rehman Yusufzai

Sajjad Mehsuç

Khalid Khan

&

Abdul Samad Khan

Advocates, Peshawar, 3-A, Park Avenue, Bhettani Plaza, University Town, Peshawar

Cell No.0321-9022964, 0333-9981464

6

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

	C.M No/2019 In Service Appeal No/2019
Muhammad TariqVERSUS	
Govt of Khyber Pakhtunkhwa & 02 others	Respondents

AFFIDAVIT

I, Muhammad Tariq S/O Sher Muhammad, Ex-SST (Gen), R/O Mohalla Adda, Village P/O Lund Khwar Tehsil & District Takht Bhai District Mardan, do hereby solemnly affirm declare on oath that the contents of the accompanying 'Petition' are true and correct to the best of my knowledge and belief, and that nothing has been kept concealed from this Hon'ble Tribunal.

Identified By:

DEPONENT

CNIC #: 16102-6773289-7

Amin-ur-Rehman Yusufzai

Advocate, Peshawar

AHM000

WAR HIGH

NOTARY PUBLIC

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BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,

	Service Appeal No/2019
Muhammad Tariq	Appellant
V ERSUS	
Govt of Khyber Pakhtunkhwa & 02 others	Respondents

ADDRÉSSES OF THE PARTIES

APPELLANT:

Muhammad Tariq S/O Sher Muhammad, Ex-SST (Gen), R/O Mohalla Adda, Village P/O Lund Khwar Tehsil & District Takht Bhai District Mardan

RESPONDENTS:

Dated: 18.07.2019

- 1. Govt of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Civil Secretariat Peshawar.
- 2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
- 3. Khyber Pakhtunkhwa Public Service Commission through Chairman, Fort Road, Peshawar Cantt

Appellant

Through

Amin ur Rehman Yusufzai

Sajjad Mehsuc

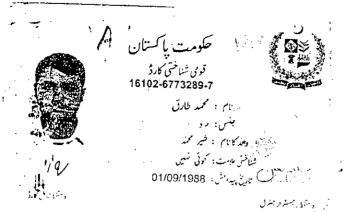
ŏ.

Khalid Khan

Advocates, Peshawar, 3-A, Park Avenue, Bhettani Plaza, University Town, Peshawar

Cell No.0321-9022964, 0333-9981464

ANNEX PAGE



شناختی نمبر . 7-16102-6773289 ناندان نمبر : 16102-6773289 مسیل تحت بهائی، سنل بردان مسیل بنت بهائی، سنل بردان مسیل بنت : ایستاً مستقل بنت : ایستاً مارخ اجراد : 28/09/2006 میل نشین : 31/08/2018 میل دین میل میل دار دین میل دین میل میل دار دین میل میل دین میل میل دین میل دین میل میل دین میل دین میل میل دین میل میل دین میل دین

ATTESTED





MUHAMMAD TARIQ

ADDRESS:

Mohallah Adda, Village & P/o Lund Khwar ,Tehsil Takht Bhai, District Mardan.

■□ OBJECTIVE:

To find a challenging position in an Establishment or Organization where I can utilize my knowledge & skills, to bring about a positive difference and contribute to the growth of the organization as far as possible.

■□ PERSONAL INFORMATION

Father's Name : Sher Muhammad

♣ Date of Birth : 01/09/1988
 ♣ Domicile : Mohmand (KPK)

♣ Nationality : Pakistani
 ♣ Gender : Male
 ♣ Religion : Islam
 ♣ Marital Status : Married

♣ NIC No
 ま 16102-6773289-7
 ♣ Mobile No.
 ま 0346-9353716

■□ ACADEMIC QUALIFICATION

EXAM	YEAR	M/Division	BOARD / UNIVERSITY
S.S.C	2004	475/850	B.1.S.E Mardan
F.A	2006	635/1100	B.I.S.E Mardan
B.A	2008	281/550	University of Peshawar
M.A (Urdu)	2011	669/1000	Al Khair University (AJK)
B.Ed	2009	853/1100	Al Khair University (AJK)
M.Ed	2018	796/1200	AIOU Islamabad

■ EXPERIENCE :

√ 07 Years experience at GHS Inzar Patty, District Orakzai to till date...

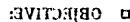
ATTI



MUHAMMAD TARIO

ADDRESS:

Mohallah Addo Village R. P/o Lund Khwar , Tehsii Takht Bhal, District Marrian.



To first a challenging position in an Establishment or Organization where I can utilize my knowledge & skills, to bring about a positive difference and contribute to the growth of the organization as far as possible.

Sher Mohammad

Mohningd (KPK)

01/09/1988

Pekistaní

PERSONAL INFORMATION

Father's Name

◆ Date of Birth

♣ formicile

· Nationality

L Gender

e Religion

Marital Status

4 NIC No Mobile No

Marited 16102-67=3289-7

Male

msial

0346-9353716

ACADEMIC QUALIFICATION

SOARD / UNIVERSITY	M/Division	YEAR	EXAM
B.t.S.R Mordon	175/850	2004	S.S.C
3.1.5.E Mardon	035/1100	2006	F.A
University of Peshawar	281/550	3008	B.A
Al Khair University (AJK)	66971000	2011	M.A (Urdu)
Al Khair University (서당)	853/1100	5002	B.Ed
AfOU Islamahad	196/1200	2018	M.Ed

EXPERIENCE.

107 Years experience at GHS Jugar Petry, District Orakgal to till date

155736

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD TRANSCRIPT

DMC No.

178459

Roll No.

BK690571

Name

MUHAMMAD TARIQ

Registration No. Enrollment Semester 16NMN03104

Father's Name

SHER MUHAMMAD

Final Semester

AUT-2016 SPR-2017

Address

ALFAROOO BOOK SEALER SCHOOL ROAD LUND KHWR

Tehsil ·

TAKHAT BHAI

District

MARDAN

has successfully completed

MASTER OF EDUCATION (M.ED One Year)

TEACHER EDUCATION

The detail of passed courses is as under

Semester Course	Title of Courses		Marks		
ocmes ter	Code		Maximum	Obtained	
AUT- 16	0831	FOUNDATIONS OF EDUCATION	100	66	
AUT- 16	0837	EDUCATIONAL RESEARCH	100	71	
AUT- 16	0838	CURRICULUM DEVELOPMENT & INSTRUCTIONS	100	74	
AUT- 16	0840	EDUCATIONAL PSYCHOLOGY	100	68	
AUT- 16	6505	ISLAMIC SYSTEM OF EDUCATION	100	67	
AUT- 16	6507	EDUCATIONAL MEASUREMENT & EVALUATION	100	63	
SPR- 17	0825	ELEMENTARY EDUCATION	100	61 .	
SPR- 17	0827	SECONDARY EDUCATION	100	66	
SPR- 17	0828	HIGHER EDUCATION	100	61	
SPR- 17	0829	TEACHER EDUCATION IN PAKISTAN	100	60	
SPR- 17	6552	TEXTBOOK DEVELOPMENT-I	100	71	
SPR- 17	6553	TEXTBOOK DEVELOPMENT-II	100	68	
			-		
				•	
	-) · V	
-					

Credit Hours

36

Result Declared on MARCH 29,2018

Total Marks/Obtained Percentage/Grade

1200 / 796

В

Date of Issue

APRIL 10,2018

Controller of Examinations

This result card/transcript is assued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.

KHAIR UNIVERSITY (AUT



DETAILED MARKS CERTIFICATE

This is to cer	tify that Muhammad Tariq		
Con/Doughte	er ofSher Muhammad		
Registration	**************************************	Roll No	17410
Registration	M.A Urdu Part-IIAnnual/Sup		
ias passed _ held in <u>Dece</u>	ember 20 10 in 1st Division and obtained	342	marks
The Marks	obtained in each subject are given below:-		
Papers	SUBJECTS	Marks Obtained	Maximum Marks
VI	Mir-O-Ghalib ka Khasosee Mutalia	76	100
VII	Urdu Adab kaa Pakistani Door	68	100_
VIII	Pakistani Zubanoo ka Adab	71	100
IX	Iqbal ka Khasosee Mutalia	67	100
X	Sahafat	60	100
		<u> </u>	
	Marks Obtained in Part-l	327	500
	TOTAL	.: 669	1000

Note: This DMC is issued, errors and omissions excepted, as a NOTICE only. An entry appearing in it does not in itself confer any right or privilege independently to the grant of a proper Certificate / Degree which will be issued under the Regulations in due course.

28th May, 2011. Muzaffarabad, the

Prepared by...

Checked by.

CONTROLLER OF EXAMINATIONS



WHAIR UNIVERS/>

DETAILED MARKS CERTIFICATE

	certify thatMUHAMMAD TARIQ		·
Registra	ghter of SHER MUHAMMAD tion No AUMZ(E)3073-2008 Roll		
held in _	ed <u>Bachelor of Education</u> Annual/Supplemented <u>December 20 09 in 1st</u> Division and obtainers obtained in each subject are givn below:-	entary Exa ed <u>853</u> n	mination narks.
Papers	SUBJECTS	Marks 1 Obtained	Maximum Marks
[Philosophy & History of Education	77	100
	Education Psychology	68	100
_111	School Administration	68	100
<u>IV</u>	(i) Islamayat (ii) Pakistan (iii) Kashmir Studies	77	100
<u>V</u>	(i) English Language & Literature ii. Urdu	. 72	100
	Elective Subjects		
VI-VII	Teaching of Islamic Studies	167	200
VI-VII	Teaching of Pakistan Studies	155	200
P.Skill	Practical Skills in Teaching(Part-II)	169	200
	TOTAL	853	1100

Note: This DMC is issued, errors and omissions excepted, as a NOTICE only. An entry appearing in it does not in itself confer any right or privilege independently to the grant of a proper Certificate / Degree which will be issued under the Regulation in due course.

Muzaffarabad:- the 5th March, 2010.

Prepared by Fullsa

ATTESTED

DY. CONTROLLER OF EXAMINATIONS

CONTROLLER OF EXAMINATIONS



Unibersity Of Peshawar

(Pakistan)

Session: Annual 2008 <u>MUHAMMAD TARIQ</u> Son Of SHER MUHAMMAD – and a Private Candidate of_____ District Mardan having Passed the prescribed examination held in _____June 2008 ___ is this day admitted by the University Of Peshawar to the Degree of ______ Bachelon of Ants 3rd divis⁄⊫en The examination was taken as a whole

Registration No. 2007-PC-5952

Roll No. 76728

CNI. C.N. 16102-6773289-7

2 Rout Obelared on October 11, 2008







Vice Chanceller

S. No. 4443

Roll No. 46828

Group. Humanities



Board of Intermediate and Secondary Education Mardan N.W.J.P. Pakistan INTERMEDIATE EXAMINATION

SESSION 2006 - ANNUAL

	AMMOAL	
This is to certify thatMUHAMMAD TARIQ and Student ofDistrict Mardan 22 in the Control of	San ofSHER	MUHAMMAD
and Student of District Mardan Registration No Examination of the Board of Intermediate & Second as a Private Candidate. He Obtained 635 M		
as a Private bandidate. He Obtained 635 Mas Evade C Representing Good	ths out of 1100 and has b	been placed in
Asstt. Secretary		Secretary to

This certificate is issued without alteration or erasure

HNEXUSE

NWFP PUBLIC SERVICE COMMISSION

2- Fort Road Peshawar Cantt:

Website: www.nwfppsc.gov.pk



Dated: 26-01-2009.

No. 01/2009. DVERTISEMENT J

Applications are invited for the following posts from Pakistani citizens of N.W.F.P/F.A.T.A domicile by 26-02-2009 (13-03-2009 for candidates from abroad). Incomplete applications and applications without supporting documents required to prove the claim of the candidates shall also be rejected without intimation to the candidates.

AGRICULTURE LIVESTOCK & CO-OPERATIVE DEPTT:

(S.No. 01)

One (01) Post of assistant Botanist. In Livestock Research & Dev:

Deptt:

M.Sc Agriculture or B.Sc (Hons) Agriculture (Obtained) after QUALIFICATION: "4" Years Instructions after F.Sc) . from a recognized University under research programme in the subject relating to the subject groups as specified in schedule -II to which the Vacancy occurs...

AGE LIMIT: 21 to 33 years, PAY SCALE: BPS-17. ELIGIBILITY: Both Sexes. ALLOCATION: Merit.

(S.No. 02)

Two (2) Posts of Research officers Fodder. In L&DD Deptt:

QUALIFICATION: M.Sc Agriculture or B.Sc (Hons) Agriculture (Obtained) after "4" Years Instructions after F.Sc) from a recognized University under research programme in the subject relating to the subject groups as specified in schedule -II to which the Vacancy occurs...

AGE LIMIT: 21 to 33 years. PAY SCALE: BPS-17. ELIGIBILITY: Male.

ALLOCATION:

 Merit	Zone-1
01	01

CHIEF ENGINEER WORKS & SERVICE DEPARTMENT.

(S.No.03)

ATTESTED

Five (05) Posts of Data Entry Operators.

QUALIFICATION: (i) 2nd Division FA/FSc with one year Diploma in Computer Science from the recognized Institute (ii) Speed of Ten thousand key depression per hour for punching/data entry/verification.

AGE LIMIT: 18 to 30 years: PAY SCALE: BPS-11. ELIGIBILITY: Both Sexes.

ALLOCATION:

Zone-1	Zonc-2 Zonc-3	Zone-4	Zone-5
01	01	01	01

DIRECTORATE OF INDUSTRIES COMMERCE MINERAL DEV: LABOUR & TECHNICAL EDUCATION DEPARTMENT,

(S.No. 04)

One (01) Post of Male Inspector Mines

QUALIFICATION: (i) Bachelor Degree in Mining Engineering from recognized University and (ii) 1st Class Mines Manager's certificate of Competency granted under the provision of Mines Act, 1923 and (iii) Two years experience in Govt: or Semi Government Mining Industries registered under the Mines Act, 1923.

AGE LIMIT: 21 to 33 years. PAY SCALE: BPS-17. ELIGIBILITY: Male. ALLOCATION: NOTE: In case of non-availability of candidates possessing the

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provisions of the rules for the time being in force.

For History-cum-Civics The candidates must possess Master's Degree either in History or Political Science provided the other required subjects has studied at B.A level. The other requirement of teaching degree will, however, remain intact.

For Biology: 2nd Class Master Degree in Botany or Zoology provided that other subject have been studied at graduate level.

AGE LIMIT: 25 to 40 years. PAY SCALE: BPS-17 ELIGIBILITY: Female.

ALLOCATION:

S.No	Subject	No. of Posts	Allocation
5	Islamiyat	02	
	Pak: Study	03	Merit Quota
7	History-Cum-Civics		Merit Quota
8	Economics	02	Merit Quota
0 .	Eschothics	02	Merit Quota
	English	02	Merit Quota
		02	Merit Quota
	Maths	02	Merit Quota
1.2, ::	Biology	. 02	Merit Quota
.13	Chemistry	02	
14	Physics	02	Merit Quota
····		<u> </u>	Merit Quota

Sixteen Hundred Eighty One (1681) Posts of Male SETs. /S.S.Ts (Both (S.No. 52) Science & Arts) (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 35 years. PAY SCALE: BPS-16 ELIGIBILITY: Male.

ALLOCATION:

Merit	Zone-1 Zone-2 Zone-3	Zone-4	Zone-5
420	280 281 280	210	210

(S.No. 53) Thirty Four (34) Posts of Male Disabled SETs. /S.S.Ts (Both Science & Arts) (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University. AGE LIMIT: 21 to 35 years. PAY SCALE: BPS-16 ELIGIBILITY: Male.

ALLOCATION: Merit.

Ninty Two (92) Posts of Male SETs. /S.S.Ts For Earth Quake Quota (I.E) Battagram, Mansehra, Shangla, Kohistan, Abbottabad. (Both Science & Arts) (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University. AGE LIMIT: 21 to 35 years. PAY SCALE: BPS-16 ELIGIBILITY: Male.

ALLOCATION: Merit.

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(S.No. 54)

(S.No. 55) Nine Hundred and Seventy Three (973) Posts of Female SETs. /S.S.T. (Both Science & Arts) (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a

recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University. AGE LIMIT: 21 to 40 years. PAY SCALE: BPS-16 ELIGIBILITY: Female.

ALLOCATION:

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
243	162	162	162	122	122

Twenty One (21) Posts of Female SETs. /S.S.Ts Disabled (with out (S.No. 56) graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a

recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 40 years. years (10 years age relaxation)

PAY SCALE: BPS-16 ELIGIBILITY: Female.

ALLOCATION: Merit.

(S.No. 57) Fifty One (51) Posts of Female SETs. /S.S.Ts For Earth Quake Quota (I.E) Battagram, Mansehra, Shangla, Kohistan, Abbottabad, (with out. graduaty and pension).

OUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University. AGE LIMIT: 21 to 40 years. PAY SCALE: BPS-16 ELIGIBILITY: Female.

ALLOCATION: Merit.

TECHNICAL EDUATION AND MAN POWER TRAINING DEPARTMENT.

(S.No. 58) Two (02) Posts of Assistant Professor Commerce in Govt: Colleges of Commercial/Govt: Commercial Training Institutes.

QUALIFICATION: (i) Ph. D in the relevant subject from a recognized University with three year teaching experience in recognized college / Govt: Commercial Institutes/ Govt: Commercial Institutes/ Govt: Commerce College ass Instructor/ Lecturer.

OR (ii) Master's Degree from a recognized University in the relevant subject with Five Years experience of teaching as Lecturer / Junior Instructor in a recognized college / Govt: Commercial Institute/ Govt: Commerce College.

AGE LIMIT: 25 to 40 years. PAY SCALE: BPS-18. ELIGIBILITY: Male.

ALLOCATION: Merit.

ATTESTED

Two (02) Posts of Assistant Professor in Computer Engineering in (S.No. 59) Govt: College of Technology & Govt: Polytechnic Institure.

OUALIFICATION: (a) Ph. D in Engineering from a recognized University / Institute with one years's teaching/ professional experience in the relevant subject as such OR (b) Master's Degree in Engineering from a recognized University/ Institute with five years teaching/ professional experience in the relevant subject as such: OR (c)

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(B)

(S.No. 66) Ten (10) Posts of Male office Assistant.

QUALIFICATION: Bachelor degree from recognized University.

AGE LIMIT: 18 to 30 years. PAY SCALE: BPS-14. ELIGIBILITY: Male.

ALLOCATION:

110200,171071	<u> </u>	· · · · · · · · · · · · · · · · · · ·		·
Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
: : 02	02	. 02	. 02	02

	(S.No. 67)	One (01) Post of Female office Assistant.	
1		OUALIFICATION: Bachelor degree from recognized University.	•
.		AGE LIMIT: 18 to 30 years. PAY SCALE: BPS-14. ELIGIBILITY: Female.	•
۱.		ALLOCATION: Merit.	: :

CORRIGENDUM

- The Post of Research Officer for Earth Quake Quota appearing at S.No.2 Advt: No.07/2007 may be read as 02 Post for Chemistry and one for cereal Crops.
- 2. The Post of Reader Advertised in Advtt: No. 07/2008 S.No. 39 may be read as one post instead of Two Posts.

GENERAL CONDITIONS.

(i) Age, qualification and experience etc shall be reckoned on 26-02-2009 Maximum age limit as prescribed in the recruitment rules shall be relaxed upto 10 years for Govt Servants who have completed 2 years continuous service, upto 10 years for disabled persons and upto 3 years for candidates belonging to backward areas of Zone-1, Zone-3, Merged Areas of Hazara and Mardan Divisions and uper Tanawal, Districts of Swat, Upper Dir, Lower Dir, Chitral, Buner, Kala Dhaka Area, Kohistan District, Shangla, Gadoon Area in Swabi, Backward areas of Mansehra and Batagram, backward areas of Haripur District i.e., Kalanjar Field Kanungo Circle of Tehsil Haripur and Amazai Field Kanungo Circle of Tehsil Ghazi. However, a candidate shall be allowed relaxation in age in one of the above categories provided that the candidates from backward areas, in addition to automatic relaxation of three years shall be entitled to one of the relaxations available to Govt Servants, general or disabled candidates, whichever is relevant and applicable to them.



Degrees / Diploma / Experience Certificates / Testimonials of unrecognized Institution are not accepted. Only original Degrees / Certificates are accepted. However, the candidates can apply on provisional certificate signed by the Controller of Examination of the respective Institution but candidates shall produce original degrees / certificates before their selection. Detail Marks Certificate for all the examination shall necessarily be required and these should be attached with the application forms.

ALLOCATION of vacancies in BPS-17 and below shall be strictly in accordance with the Zonal ALLOCATION as indicated against each post(s). The applications of the candidates other than the specified zone(s) shall be ignored except for posts reserved for Merit quota. No zonal reservation stands for posts allocated to disabled quota and also for the posts in BPS-18 and above. All such posts shall be filled in on Open Merit.

(iv) The candidates applying against disabled posts must attach with their application forms of disability certificate from the Provincial Council for Rehabilitation of Disabled Persons as well as disability certificate from the respective Medical Superintendent / Medical Board showing therein the specific disability.

ATTESTED
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- (v) Ex-armed Forces Personnel must send copy of Discharge Certificate with their applications!

 Govt. / Semi Govt. / Autonomous / Semi Autonomous Bodies employees may apply direct but their Departmental Permission Certificates should reach within 30 days of the closing date.
- (vi) Applications should be on the prescribed application form obtainable from the listed below branches of the NATIONAL BANK. Application Fee is Rs. 285/- (Rupees Two Hundred Eight Five only) for all the candidates. In addition to the application fee, the candidates will have to pay Rs. 15/- (rupees fifteen only) on account of Bank Charges. Separate application form will be required for each advertised category of posts. Application forms obtained other than the specified branches of the National Bank will be considered invalid and such applications will not be entertained. The applications on plain paper or Photostat shall not be accepted. Incomplete and late applications shall also be ignored.
- (vii)—Application must be submitted within time as no extra time is allowed for postal transit. The applications if submitted on the last date for receipt of applications must reach the Commission's office by the closing hours.
- (viii). Applicants married to Foreigners are considered only on production of the Govt. Relaxation Orders.
- (ix) No applicant shall be considered in absentia on paper qualifications unless, he/she possesses exceptionally higher qualifications than the minimum prescribed qualification for a particular post(s).
- (x) Govt. reserves the right not to fill any or fill more or less than the advertised post(s).
 - (xi) Candidates who have already availed three chances by physical appearance before the Commission and have failed for the post(s) having one and the same qualifications and scale of pay shall be ineligible.
 - (xii) Experience wherever prescribed shall be counted after the minimum qualifications for the post(s), if not specifically provided otherwise against the advertised post(s).
 - (xiii) In cases where the number of applications received for post(s) are disproportionately higher than the number of available vacancies, shortlisting of the candidates may be done in any one of the following manner:
 - (a) Written Test in the Subject.
 - (b) General Knowledge or Psychological General Ability Test.
 - (e) Academic and / or Professional record as the Commission may decide.

SPECIFIED BRANCHES OF THE NATIONAL BANK OF PAKISTAN.

Main Branches of:

- (i) Parachinar, Mardan, Swabi, Malakand, Shangla, Chitral, Timargara, Daggar, D.I.Khan, Bannu, Karak, Kohat, Hangu, Lakki Marwat, Abbottabad, Haripur, and Mansehra.
- (ii) Saddar Road Branch, Tehkal Payan Branch, and G.T Road (Nishtar Abad) Branch Peshawar.
- (iii) Tehsil Bazar Branch Charsadda, Nowshera Cantt: Branch, Bank Squade Branch Mingora and city Branch Tank.

ATTENED

(Atta Ur Rehman)

Secretary

NWFP Public Service Commission 2-Fort Road Peshawar Cantt: Ph: 9212962



Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar/

PH No. 091-9210389, 9210938, 9210437,9210957, 9210468 Fax: 091-9210936

E-mail <u>desekpk@yahoo.com</u>

(90)

Notification.

Consequent upon the recommendation of the Khyber Pakhtunkhwa Public Service Commission, appointment of the following candidates is hereby ordered against the post of Secondary School Teacher (SST Gen:) in BPS-16 (Rs.10000-800-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with immediate effect and further his Services placed at the disposal of Director of Education FATA for further posting against vacant SST General posts:-

SNO	Name	Father Name	Domicile	Zone	Permanent Address	Olama CD
$\frac{1}{1}$	2	3	4	5	6	Place of Posting
	Inayat-ur- Rehman	Abdur Rehman	Bajour • Agency		Village Fazli Abad Bara Banda Tehsil Khar Distt: Bajour Agency	disposal of Director of Education FATA for further posting against
2	Muhammad Tariq	Sher Muhammad	Mohmand Agency	I	Village Shah Khan Tangi Suran Dara, Tehsil Upper Mohmand Distt: Mohmand Agency	vacam SST Gree posts -Do-

Terms and conditions:-

- 1. His services will be considered regular but without pension & Gratuity in terms of section 19 of the NWFP civil Servant Act, 1973 as amended vide NWFP Civil Servants (Amendment) Act, 2005. he will however be entitled to Contributor; provident fund in such a manner and at such rates as per prescribed by the Govi.
- 2. In case, he is already in Government: service and working against pensionable post on regular basis before Ist day of July 2001, without any service break, on application to Khyber Pakhtunkhwa Public service Commission through proper channel and selection by the commission, is appointed and allowed choice of option either to retain benefit of pension & gratuity as allowed to his under his previous terms of appointment or to avail the benefit of contributory provident fund allowed to him under new appointment.
- 3. His services are liable to termination on one months notice from either side. In case of resignation with out notice his one-month pay/allowances shall be forfeited to the Government.
- 4. He should join his post within 30 days of the issuance of this notification. In case of failure to join there post within one month of issuance of this notification his appointment will expire automatically and no subsequent appeal etc shall be entertained.
- 5. He would be on probation for a period of one year extendable for another one year.
- 6. He will be governed by such rules and regulations as may be issued from time to time by the Govt.

ATTE STED

- His Services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be proceeded under the rules framed from time to time.
 - Charge report should be submitted to all concerned 8.
 - 9. The Director of Education FATA concerned would furnish a certificate to the effect that the candidate has joined the post or otherwise after one month of the issue of his posting orders.
 - 10. The Director of Education FATA concerned will verify their documents before release of pay.
 - His seniority will be maintained as determined by the Khyber Pakhtunkhwa Public 11. Service Commission.
 - No TA/DA will be allowed to the appointee for joining his duty. *12.*

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

File No.2/A-14/SST: Gen (M)/PSC/Apptt: Dated Peshawar <u>09/01/2013</u>

Copy forwarded for information and necessary action to the:-

- Accountant General Khyber Pakhtunkhwa Peshawar. 1.
- Secretary Khyber Pakhtunkhwa Public Service Commission Peshawar. 2.
- Director of Education FATA Warsak Road Peshawar. 3.
- All Agency Accounts Officer in FATA. 4.
- Official Concerned 5.
- PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department. 6.
- PA to the Director E&SE Khyber Pakhtunkhwa, Peshaw 7. 49/1/2013

8. M/File

Dy: Director (Estab)

Elementary and Secondary Education

Khyber Pakhtunkhwa Peshawar



FATA SECRETARIAT DIRECTORATE OF EDUCATI

WARSAK ROAD PESHAWAR, PAKISTAN PHONE, 091-9710166 FAX 993-9710210

A-Y/PSC/SET/GENERAL/201/

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ADJUSTMENT

Consequent upon their appointment as SST (General) in BPS-16 on the basis of recommendation of Khyber Pakhtunkhwa Public service Commission and placement of their services at the disposal of Director Education, FATA vide Director, Elementary & Secondary Education Khyber Pakhtunkhwa's Notification No. 1705-12/File No. 2/A-14/SST(M)/Gen/PSC/Apptt: dated 09-01-2013, the following SSTs are hereby adjusted in the schools noted against each with immediate effect:

S/#	Name/Father's Name/Domiçile/Address	Posted at	Remarks
. •			
i	Inayat ur Rahman S/o Abdur Rehman (Bajour)	GHSS Kalaya	Against
	Village Fazli Abad Bara Banda, Tehsil Khar	Orakzai Agency	vacant post
•	Distt: Bajour Agency		,
2	Muhammad Tariq S/o Sher Muhammad	GHS Inzer Pati	-do-
-	Village Shah Khan Tangi, Suran Dara Tehsil Upper	Orakzai Agency	
	Mohmand Distt: Mohmand Agency		

Note: -

The terms & conditions of their posting will be the same as already prescribed in the above mentioned Notification of Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar. However the agency Education Officer concerned will verify their documents before release of pay.

(ROZWALI KHAN)

DIRECTOR EDUCATION (FATA)

Endst: No. 1138-43/A-1/Apptt: of SST (General) (PSC)2012 Dated Pesh: the 29/1/2013 Copy forwarded to the: -

- Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar w/r to his Notification cited above.
- 2 Agency Education Officer Orakzai Agency
- 3 Agency Accounts Officer Orakzai Agency
- 4 Head Masters concerned.

Candidate Concerned

6 P.A to D.E FATA

ATTESTED

ADDI: DIRECTOR (ESTAB)

(93)

CHARGE REPORT:

I Muhammad Tariq S/O Sher Muhammad took over Charge against Vacant SST Post at GHS Inzarpati Orakzai Agency on the Fore Noon 22-01-2013 Vide Director Elementary & Secondary Education Khyber Pakhtunkhwa Notification No: 1761-68 /File No-2/A-14/SST (M) Gen /PSC/Apptt: dated 24-01-2013. and D.E. FATA Peshawar Endstt: No: 1138-43 A-1 Apptt: of SST (general) (PSC) 2012 dated Pesh 22-1-2013.

Signature of taken Over Charge

Name of Govt: Servant:

Muhammad Tariq

Designation:

<u>SST</u>

Station:

___ Inzarpati

Signature of taking Over Charge_

Name of Govt: Servant:

vacant 2/4/2013.

Designation:

Station:

Dated 22/01/2013...

1- Director Elementary & Secondary Education Khyber Pakhtunkhwa.

2- Director of Education FATA Secretariat Peshawar.

3- Agency Accounts Officer Orakzai Agency at Hangu.

4- Agency Education Officer Orakzai Agency at Hangu

5- Manager NBP Hangu

6- Officer concerned.

Endstt: No

Head Master

GHS Inzarpati O.A

MEAD MASTER G.H.S INZAR PATI

(O.A)

ATTELTED

Substituted by even No & date:



DIRECTURALE OF BLEME		n i ò
SECONDARY EDUCATION	кну	BER
PAKHTUNKHWA		

, 64160 (91)

NOTIFICATION

- 1. WHERE AS: one Mr. Muhammad Tariq S/O Sher Muhammad who himself appointed as SST (G) in GHS Inzar Patti District Orakzai vide appointment Notification No. 1705-12/File No. 2/A-14/SST(M)/Gen/PSC/Apptt: dated 09/01/2013 which was not issued by the Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa, hence fake and bogus.
- 2. AND WHERE AS, the competent authority has directed the above said accused SST to produce authentic and verified service record from the concerned authorities, but he failed to comply with the legitimate directions of high ups regarding production of requisite authentic documents/record.
- 3. AND WHERE AS, further an inquiry committee was constituted by the competent authority vide Notification No. 8154-63 dated 04/8/2016 who have gone through the entire case record and it has been proved that the said appointment order for the aforesaid post advertised by Public Service Commission Khyber Pakhtunkhwa was turned out fake/bogus.
- 4. AND WHERE AS, it has come to the notice of the competent authority that Mr. Muhammad Tariq S/O Sher Muhammad, having no legal status of the said appointment order.
- 5. NOW THEREFORE, under the mandatory provision and power conferred under Section-20 & 21 for General clauses Act-1897 as amended in 1956 and in pursuance of the scrutiny of selection/appointment record in r/o the above mentioned SST which was found fake/bogus, thus his appointment Notification No. 1705-12/File No. 2/A-14/SST(M)/Gen/PSC/Apptt: dated 09/01/2013 is hereby declared as fake/bogus ab initio and subsequently "disowned" with the direction to District Education Officer (concerned) to recover salaries and other allied benefits drawn by Mr. Muhammad Tariq S/O Sher Muhammad in the interest of Public Service.

Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar

Endst: No. <u>5740-45</u> dated <u>04/04/2019</u>

Copy forwarded to the:-

- 1. Deputy Commissioner, District Orakzai with the request to take legal action.
- District Education Officer District Orakzai with the direction to take necessary steps for the recovery of outstanding amount against fake/bogus SST concerned.
- 3. District Account Officer Orakzai to co-operate in the matter.
- 4. PS to Secretary Elementary and Secondary Education Khyber Pakhtunkhwa.
- 5. PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa.

6. Principal/Head Master concerned.

ATTESTED

Deputy Director (Estab)

Merged Districts

1. 2. 3. 4. 5.

٠٠ بچفور جناب سيرٹري E&SE ڈيپار ٹمنٺ KP پڻاور

محكمانه ايل برخلاف نوتيفيكيشن محرره 2019-04-04 جس كى روسے دائر يكثر صاحب E&SEك دُيپارٹمنٹ KP پشاور نے Applicant مجرتی کے احکامات بحثیت SST مخررہ 2013-01-22 کو پکطرفہ طور پر جعلی وفرضی بتلا کر Applicant کوملازم مانے سے انکار کردیا۔ استدعا نوٹیفیکیشن محررہ 2019-04-04 مجازیہ جناب ڈائر بکٹرصاحبE&SE ڈیپارٹمنٹ KP پشاورکوکالعدم کرکے Applicant کوملازمت پر تمام مراعات كے ساتھ بحال كيا جائے۔

- ید Applicant ضلع مهند کا پیدائش باشندہ ہے۔
- بیکہ M.A, B.Ed ، Applicant تک تعلیم یافتہ۔
- ىيە كەمچكىة E&SE ۋىيار ئىنىڭ KP) پىشا درنے بذرىيداشتها رمحررە 2009 مجازىيە KPPSC يىل صوبەبىر حد (ابKP) كەال _3 أميدوارون سے SST كى پوسٹول كيلئے ورخواسيں طلب كيے - چونكد Applicant تمام شرا لطر پورا أثر رہا تھا۔ لئے بذيعہ Through Proper Channel ابلائی کی۔
 - ید کر جر قر کے مروجہ طریقہ کارے نکلتے ہوئے Applicant میرٹ اسٹ میں جگہ بنانے میں کامیاب ہوا۔
- ىيك Applicant كوKPPSC يس با قاعده SEى قائد يبإر ثمنث KP پشاوركومنظور كياجو كە تىككىدىنى بذرىيدنونىغىيىش محررە _5 201-2013 تعیناتی کے احکامات جاری کر کے بعدازروئے تھم محررہ 2013-01-22 تعیناتی کے احکامات جاری کر کے بعدازرہ نے تحكم محرره 2013-01-22 ٹرائیل ڈسٹر كرف اوركز كى ميں جى اچ ايس انذر يفئے ميں ايد جسٹ كيا گيا۔اوراب تك ميں اى پوسٹ بركام كرر ہاہوں تقريباً 7سال ہے۔
 - ید کہ بغیر جارج شیٹ اور شوکا زنوٹس و پرسنل مئیر نگ اور ریگولرا نکوائری کے Applicant کیطرفدا حکا مات محررہ 2019-04-04 کی رو نے نوکری سے برخاست کیا گیا۔ بلکہ جمرتی احکامات کوجعلی وفرضی گرواند کیا جو کظلم اور نا انصافی کامنہ بولتا جبوت ہے۔اس لیے قابل منسوخی
- بیرکہ Applicant کے 7 سال سے زیادہ عرصہ ملازمت کو بہ یک جنبش قلم ختم کر کے ندصر ف گھر بھیجے دیا گیا بلکہ دور ملازمت کی تمام تخواہیں واپس لی جانے کے احکامات جاری کیے گئے جو کہ آئین اور قانون کے منافی ہے۔

لہذ االتماس ہے کہ بمنظوری درخواست بذانوٹیفیکیشن محرِرہ 2019-04-04 کوکالعدم کر کے Applicant ملازمت پر بحال کیا جائے۔

مورخه ;2019-04-16

محمه طارق ایس الیس فی جزل جی انتخ ایس انذر پینے ڈسٹر کٹ اور کزئی

wing of the first of the state العدي المفتحيان ولم العزين المراج بسال ورون فيلع مهند عدم الماري المراج المراج المراج المراج المراج المراج المراج الموات المعدي عبدالتي ولرقبطيد عبدت المراي ورون المراي عبدالي ورون المراي الموث المراي عبدالي ورون المراي الموث المراي الموث المراي ال - الكيسر العد ولا فان في عليه الحرَّ بي أعلى اور أن المعدالية والمورود والمعدالية والمورود والمعدالية والمرازية والمر ولا و له منع عليه منعرى اور لزع - الحالفال دار فاما در عله المورى بلع كي عفاء العمر ولبرعم الجمام عليه مناري كندي في الله على وازى وله فقل دى وله معلى المرولية GGMS Stamila Odbas 13, a

مقدمه مندرجه بالاعنوان میں اپی طرف سے واسطے پیروی وجوابد ہی بمقا امين الرحمن موسفر في المروكية وكيت والى كورك ، فيذرل شريعت كورث آف ياكتان ايند سيجادا حريحسود المدوكية والى كورث ، کو بدین شرط و کیل مقرر کیا ہے کہ میں ہر پیشی برخود یا بذر بعیر مختار خاص رو بروعدالت حاضر ہوتا رہونگا۔اور بوقت یکارے جانے مقدمہ وکیل صاحب موصوف کواطلاع دیکر حاضرعدالت کرونگا اگرییثی پرمن مظهر حاضر نه ہوا اور مقدمه میری غیر حاضری کی وجہ ہے کسی طور میرے برخلاف ہوگیا تو صاحب موصوف اس کے سی طرح ذمہ دارنہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام پچہری کے سی م اورجگہ یا کچبری کے مقررہ اوقات سے پہلے یا پیچھے یا ہز ورتعطیل پیروی کرنے کے ذمددارنہ ہوں گے۔اگر مقدمه علاوہ صدرمقام کچبری کے کس اور جگہ ماعت ہونے پابروز تعطیل یا مجہری کے اوقات کے آگے پیچھے پیش ہونے برمن مظہر کوکوئی نقصان مینچے تواس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا محنتار نامہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں نظے۔ مجھ کوکل ساختہ بر داخته صاحب موصوف مثل کرده ذات خود منظور قبول هوگا۔اور صاحب موصوف کوعرضی دعوی و جواب دعوی اور درخواست اجرائے ڈ کری ونظر نانی اپیل ونگرانی ہرتنم کی درخواست پر دستخط وتصدیق کرنے کا بھی اختیار ہوگا۔اورکسی تھم یا ڈگری کے اجرا کرانے اور ہرتشم کا رویبیدوصول کرنے اور رسیدوینے اور داخل کرنے اور ہرتم کے بیان دینے اور سپر د ٹالٹی وراضی نامہ کو فیصلہ برخلاف کرنے ،اقبال دعوی دینے کا بھی اختیار ہوگا۔اور بصورت اپیل و برآیدگی مقدمہ یا منسوخی ڈگری پیطرفیہ درخواست حکم امتناعی یا قرتی یا گرفتاری قبل از اجرا ، ذگری بھی موصوف کو بشرط ادائیگی علیحد ہمخنتار نامہ پیروی کا اختیار ہوگا۔اور بصورت ضرورت صاحب موصوف کوبھی اختیار ہوگا یا مقدمہ ندکورہ یااس کے کسی جزو کی کاروائی کے واسطے یا بصورت اپیل ، اپیل کے واسطے کسی دوسرے وکیل یا بیرسٹر کو بھائے اپنے باسے ہمراہ مقررکرین اورا پیے مشیر قانون کو ہرامر میں وہی اور و پیے ہی اختیارات حاصل ہوں گے۔ جیسے کہ صاحب موصوف کو حاصل میں اور دوران مقدمہ میں جو پچھ ہرجانہ التواءیڑے گا۔وہ صاحب موصوف کاحق ہوگا۔اگر وکیل صاحب موصوف کو یوری فیس تاریخ پیش ہے سلے ادانہ کروں گا تو صاحب موصوف کو پورااختیار ہوگا کہ مقدمہ کی پیروی نہ کریں اورایسی صورت میں میرا کوئی مظالبہ کسی قتم کا صاحب موصوف کے برخلاف نہیں ہوگا۔لہذا بیمخنار نامہ لکھ دیا کہ سندر ہے مورجہ _____ مضمون مختار نامہ ت لیا ہے اور ا کپنی طرح مجھ کیا ہے اور منظور ہے۔ ATTESTED & ACCEPTED: Amin ur Rehman Yousafzai Advocate High Court, & Federal Shariat Court of Pakistan.

Sajjad Ahmad Wehsud Advocate High Court Peshawar

BEFORE THE HONORABLE KHYBER PAKHATUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No:972/2019

Muhammad Tariq, Ex SST (G) B-16 District MardanAppellant.

VERSUS

Secretary (E&SE) Department, Khyber Pakhtunkhwa & others.Respondents

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Asstt: Director (Lit: II) E&SE Department, Khyber Pakhtunkhwa, Peshawar.

BEFORE THE HONORABLE KHYBER PAKHATUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No: 972/2019

Muhammad Tariq, Ex SST (G) B-16 District Madan.....Appellant.

VERSUS

Secretary (E&SE) Department, Khyber Pakhtunkhwa & others.......Respondents.

JOINT PARAWISE COMMENTS ON & FOR BEHALF OF RESPONDENTS No:1-2.

Respectfully Sheweth:-

The Respondents submit as under:-

Preliminary Objections.

- 1 That the Appellant has got no cause of action/locus standi.
- 2 That the instant Service Appeal is badly time barred.
- 3 That the Appellant has concealed material facts from this Honorable Tribunal in the instant service appeal.
- 4 That the instant Service Appeal is based on mala-fide intentions.
- 5 That the Appellant has not come to this Honorable Tribunal with clean hands.
- 6 That the Appellant is not entitled for the relief he has sought from this Honorable Tribunal.
- 7 That the instant Service Appeal is against the prevailing law & rules.
- 8 That the instant Appeal is based on mala fide intentions just to put extra pressure on the Respondents for gaining illegal service benefits.
- 9 That the instant Service Appeal is not maintainable in its present form.
- 10 That the instant Service Appeal is bad for mis-joinder & non-joinder of the necessary parties.
- 11 That the instant Service Appeal is barred by law.

- 12 That the Appellant is not competent to file the instant appeal against the Respondents.
- 13 That the impugned Notification dated 4/4/2019 of the Respondent Department is legally competent & liable to be maintained in favor of the Respondents.
- 14 That no Departmental Appeal has been filed by the appellant to the Respondent Department against the impugned Notification dated 4/4/2019.
- 15 That the appointment letter of the appellant has been declared as fake and bogus by the Respondent Department.
- 16 That the Notification dated 4/4/2019 has correctly been issued by the Respondent Department after observing all the codal formalities.

ON FACTS.

- That Para-I needs no comments, being pertains to the Service Record of the Appellant against the SST (G) B-16 post which has been declared fake & bogus and even disowned by the Respondent Department vide Notification dated 4/4/2019. In view of the recommendations of the inquiry committee which was constituted vide Notification No. 8154-63 dated 4/8/2016, who submitted its report that the afore said order & Appointment Notification dated 09/01/2013 of the appellant is fake & bogus with no cogent record in the Respondents No. 2 & 3 offices.
- 2. That Para-2 also needs no comments being pertains to the academic & professional qualification of the appellant.
- 3 That Para-3 is correct, hence, needs no comments.
- That para-4 is correct to the extent of Advertisement dated 26/01/2009 by the Respondent No.03, wherein, the appellant did not apply for the said post nor appeared in the interview before the Respondent No.3 for the appointment against SST (G) Male B-16 post, hence, the claim of the appellant regarding his appointment vide Notification dated 09/01/2013 is baseless & liable to be rejected in favor of the Respondents. (Copy of the Ad; dated 26/01/2009 is Annexure-A).
- That Para-5 is incorrect & denied on the grounds that no cogent proof & legal justification has been annexed by the appellant in support of his stand regarding his recommendations against the SST (G) B-16 post by the KPK PSC & his further adjustment vide Notification dated 09/01/2013 against the said post in the Respondent Department are fake & bogus as the entire service record of the appellant has been found fake & bogus, hence, his services against the SST (G) B-16 post has been disowned & even null & void ab-initio having no legal effect in the eyes of law & rules vide Notification dated 04/04/2019 by the competent authority (Copy of the said Notification dated 04/04/2019 is Annexure-B).

- That Para-6 is incorrect & denied on the grounds that the services of the appellant against the SST (G) B-16 post have been disowned vide Notification dated 4/4/2019 by the Respondent No.2 after observing all legal formalities under the rules & the claim of the appellant regarding his recommendations by the KPK PSC against the SST(G) B-16 & his adjustment as SST vide Notification dated 22/01/2013 are fake & bogus having no record in the Respondent Department.
- 7 That Para-6 is incorrect on the grounds that the Services of the appellant has been placed against the SST (G) B-16 at GHS Inzar Peti District Orakzai vide order dated 22/01/2013 as per claim of the appellant is also fake & Bogus, hence, disowned by the Respondent Department by the competent authority & where against no Departmental appeal against the Notification dated 4/4/2019 has been filled by the appellant to the competent authority nor any such record is available in the Respondent Department till date, hence, got finality under the Law & rules against the appellant
- 8 That para-7 is incorrect & denied on the grounds that the Services of the appellant against the SST (GP) B-16 has been disowned by the competent authority & where against no Departmental appeal against the Notification dated 4/4/2019 has been filled by the appellant to the competent authority nor any such record is available in the Respondent Department till date, hence, got finality under the Law & rules against the appellant, however, the Respondents further submit on the following grounds inter alia:-

ON GROUNDS.

- A <u>Incorrect & not admitted</u>. The appellant has been treated as per law, rules & policy vide the above said Notification dated 4/4/2019 by the Respondent Department in the instant case, hence, the stance of the appellant is baseless & liable to be rejected.
- B Incorrect & not admitted. The appellant has been treated as per law, rules & policy vide the above said Notification dated 4/4/2019 by the Respondent Department in the instant case having no question of violation of Article 10-A of the constitution of 1973, hence, the stance of the appellant is baseless & liable to be rejected.
- C <u>Incorrect & not admitted</u>. The statement of the appellant is without any cogent reason & justification on the grounds as agitated in the foregoing paras of the present reply by the Respondents as regular inquiry has been conducted vide Notification bearing endst; No.8154-63 dated 4/8/2019 by the competent authority who declared the documents & 1st appointment as fake & bogus, hence, the plea of the appellant is without any justification.
- Incorrect & not admitted. The stand of the appellant is without any cogent reason & legal justification on the grounds that his 1st appointment Notification dated 46/8/20/8 of the appellant have been found fake & bogus by the Respondent Department, hence, his services against the SST (G) B-16

<u>Legal</u>. However, the Respondents also seek leave of this Honorable Tribunal to submit additional grounds, record & case law at the time of arguments on the date fixed.

In view of the above made submissions, it is most humbly requested that this Honorable Tribunal may very graciously be pleased to dismiss the instant Service Appeal in favor of the Respondents in the interest of justice.

Dated ____/

Director

E&SE Department Khyber Pakhtunkhwa, Peshawar.

(Respondent No: 2)

E&SE Department Khyber Pakhtunkhwa, Peshawar.

/2020

(Respondent No: 1)

AFFIDAVIT

I, <u>Hayat Khan Asstt: Director (Litigation-II)</u> E&SE Department Khyber Pakhtunkhwa, do hereby solemnly affirm & declare on oath that the contents of the instant Parawise Comments are true & correct to the best of my knowledge & belief.

Deponent

Phnezuse

NWFP PUBLIC SERVICE COMMISSION

2- Fort Road Peshawar Cantt:

Website: www.nwfppsc.gov.pk

Dated: 26-01-2009

Vo. 01 / 2009. DVERTISEMENT

Applications are invited for the following posts from Pakistani citizens of N.W.F.P/F.A.T.A domicile by 26-02-2009 (13-03-2009 for candidates from abroad). Incomplete applications and applications without supporting documents required to prove the claim of the candidates shall also be rejected without intimation to the candidates.

AGRICULTURE LIVESTOCK & CO-OPERATIVE DEPTT

(S.No. 01) One (01) Post of assistant Botanist. In Livestock Research & Dev: Deptt:

> QUALIFICATION: M.Sc Agriculture or B.Sc (Hons) Agriculture (Obtained) after "4" Years Instructions after F.Sc). from a recognized University under research programme in the subject relating to the subject groups as specified in schedule -11 to which the Vacancy occurs...

> AGE LIMIT: 21 to 33 years. PAY SCALE: BPS-17. ELIGIBILITY: Both Sexes. ALLOCATION: Merit.

(S.No. 02)

Two (2) Posts of Research officers Fodder. In L&DD Deptt:

QUALIFICATION: M.Sc Agriculture or B.Sc (Hons) Agriculture (Obtained) after "4" Years Instructions after F.Sc) from a recognized University under research programme in the subject relating to the subject groups as specified in schedule -II to which the Vacancy occurs...

AGE LIMIT: 21 to 33 years: PAY SCALE: BPS-17. ELIGIBILITY: Male. ALLOCATION:

Merit		Zone-1	
01.		01	

CHIEF ENGINEER WORKS & SERVICE DEPARTMENT

(S.No. 03)

TIED

Five (05) Posts of Data Entry Operators.

QUALIFICATION: (i) 2nd Division FA/FSc with one year Diploma in Computer Science from the recognized Institute (ii) Speed of Ten thousand key depression per hour for punching/data entry/verification.

AGE LIMIT: 18 to 30 years. PAY SCALE: BPS-11. ELIGIBILITY: Both Sexes.

ALLOCATION:

Zone-1	Zonc-2 Zonc-3	Zone-4	Zone-5
01	01 01	: 01.	01

DIRECTORATE OF INDUSTRIES COMMERCE MINERAL DEV: LABOUR & TECHNICAL EDUCATION DEPARTMENT.

(S.No. 04)

One (01) Post of Male Inspector Mines

QUALIFICATION: (i) Bachelor Degree in Mining Engineering from recognized University and (ii) 1st Class Mines Manager's certificate of Competency granted under the provision of Mines Act, 1923 and (iii) Two years experience in Govt: or Semi Government Mining Industries registered under the Mines Act, 1923.

AGE LIMIT: 21 to 33 years: PAY SCALE: BPS-17. ELIGIBILITY: Male.

provisions of the rules for the time being in force.

For History-cum-Civics: The candidates must possess Master's Degree either in History or Political Science provided the other required subjects has studied at B.A level. The other requirement of teaching degree will, however, remain intact.

For Biology: 2nd Class Master Degree in Botany or Zoology provided that other subject have been studied at graduate level.

AGE LIMIT: 25 to 40 years. PAY SCALE: BPS-17 ELIGIBILITY: Female.

ALLOCATION:

S.No Subject	1	
	No. of Posts	Allocation
5 Islamiyat	02	Merit Quota
6. Pak: Study	03	Merit Quota
7. History-Cum-Civics		Merit Quota
8. Economics		
9, English	02	Merit Quota
10. Statistics	02	Merit Quota
	02	Merit Quota
11 Maths	02	
12. Biology		Merit Quota
	02	Merit Quota
13. Chemistry	02	
14. Physics		Merit Quota
1 ilysics	02	Merit Quota

(S.No. 52) Sixteen Hundred Eighty One (1681) Posts of Male SETs. /S.S.Ts (Both Science & Arts) (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University. AGE LIMIT: 21 to 35 years. PAY SCALE: BPS-16 ELIGIBILITY: Male.

ALLOCATION:

3.7	<u> </u>			
Merit	Zone-1 Zone-2	Zone-3	Zone-4	Zone-5
420	280 281	280	210	210

(S.No. 53) Thirty Four (34) Posts of Male Disabled SETs. /S.S.Ts (Both Science & Arts) (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University. AGE LIMIT: 21 to 35 years. PAY SCALE: BPS-16 ELIGIBILITY: Male. ALLOCATION: Merit.

(S.No. 54)

Ninty Two (92) Posts of Male SETs. /S.S.Ts For Earth Quake Quota (I.E) Battagram, Mansehra, Shangla, Kohistan, Abbottabad. (Both

Science & Arts) (with out graduaty and pension).

OUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University. AGE LIMIT: 21 to 35 years. PAY SCALE: BPS-16 ELIGIBILITY: Male. ALLOCATION: Merit.

Nine Hundred and Seventy Three (973) Posts of Female SETs. /S.S.Ts (Both Science & Arts) (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a

recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University. AGE LIMIT: 21 to 40 years. PAY SCALE: BPS-16 ELIGIBILITY: Female.

ALLOCATION:

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
243	162	162	162	122	122 .

Twenty One (21) Posts of Female SETs. /S.S.Ts Disabled (with out (S.No. 56) graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 40 years, years (10 years age relaxation)

PAY SCALE: BPS-16 ELIGIBILITY: Female.

ALLOCATION: Merit.

(S.No. 57) Fifty One (51) Posts of Female SETs. /S.S.Ts For Earth Quake Quota (I.E) Battagram, Mansehra, Shangla, Kohistan, Abbottabad, (with out graduaty and pension).

> OUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

> For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University. AGE LIMIT: 21 to 40 years. PAY SCALE: BPS-16 ELIGIBILITY: Female. ALLOCATION: Merit.

<u> TECHNICAL EDUATION AND MAN POWER TRAINING</u> DEPARTMENT.

(S.No. 58)

Two (02) Posts of Assistant Professor Commerce in Govt: Colleges of Commercial/Govt: Commercial Training Institutes.



OUALIFICATION: (i) Ph. D in the relevant subject from a recognized University with three year teaching experience in recognized college / Govt: Commercial Institutes/ Govt: Commercial Institutes/ Govt: Commerce College ass Instructor/ Lecturer.

OR (ii) Master's Degree from a recognized University in the relevant subject with Five Years experience of teaching as Lecturer / Junior Instructor in a recognized college / Govt: Commercial Institute/ Govt: Commerce College.

AGE LIMIT: 25 to 40 years. PAY SCALE: BPS-18, ELIGIBILITY: Male

ALLOCATION: Merit.

(S.No. 59)

Two (02) Posts of Assistant Professor in Computer Engineering in Govt: College of Technology & Govt: Polytechnic Institure.

QUALIFICATION: (a) Ph. D. in Engineering from a recognized University ! Institute with one years's teaching/ professional experience in the relevant subject as such OR (b) Master's Degree in Engineering from a recognized University/ Institute / // with five years teaching/ professional experience in the relevant subject as such OD (a)



(S.No. 66) Ten (10) Posts of Male office Assistant.

QUALIFICATION: Bachelor degree from recognized University.

AGE LIMIT: 18 to 30 years. PAY.SCALE: BPS-14. ELIGIBILITY: Male.

ALLOCATION:

Zone-1	Zone-2 Zone-3	Zone-4	Zone-5
02	02 02	02	02

(S.No. 67) One (01) Post of Female office Assistant.

OUALIFICATION: Bachelor degree from recognized University.

AGE LIMIT: 18 to 30 years. PAY SCALE: BPS-14. ELIGIBILITY: Female.

ALLOCATION: Merit.

CORRIGENDUM

- The Post of Research Officer for Earth Quake Quota appearing at S.No.2 Advt: No.07/2007 may be read as 02 Post for Chemistry and one for cereal Crops.
- The Post of Reader Advertised in Advtt: No. 07/2008 S.No. 39 may be read as one post instead of Two Posts.

GENERAL CONDITIONS.

Age, qualification and experience etc shall be reckoned on 26-02-2009 Maximum age limit as prescribed in the recruitment rules shall be relaxed upto 10 years for Govt Servants who have completed 2 years continuous service, upto 10 years for disabled persons and upto 3 years for candidates belonging to backward areas of Zone-1, Zone-3, Merged Areas of Hazara and Mardan Divisions and uper Tanawal, Districts of Swat, Upper Dir, Lower Dir, Chitral, Buner, Kala Dhaka Area, Kohistan District Shangla, Gadoon Area in Swabi, Backward areas of Mansehra and Batagram, backward areas of Haripur District i.e., Kalanjar Field Kanungo Circle of Tehsil Haripur and Amazai Field Kanungo Circle of Tehsil Ghazi. However, a candidate shall be allowed relaxation in age in one of the above categories provided that the candidates from backward areas, in addition to automatic relaxation of three years shall be entitled to one of the relaxations available to Govt Servants, general or disabled candidates, whichever is relevant and applicable to them.

ATTESTE

Degrees / Diploma / Experience Certificates / Testimonials of unrecognized Institution are not accepted. Only original Degrees / Certificates are accepted. However, the candidates can apply an provisional certificate signed by the Controller of Examination of the respective Institution but candidates shall produce original degrees / certificates before their selection. Detail Marks Certificate for all the examination shall necessarily be required and these should be attached with the application forms.

ALLOCATION of vacancies in BPS-17 and below shall be strictly in accordance with the Zonal ALLOCATION as indicated against each post(s). The applications of the candidates other than the specified zone(s) shall be ignored except for posts reserved for Merit quota. No zonal reservation stands for posts allocated to disabled quota and also for the posts in BPS-18 and above. All such posts shall be filled in on Open Merit.

(iv) The candidates applying against disabled posts must attach with their application forms of disability certificate from the Provincial Council for Rehabilitation of Disabled Persons as well as disability certificate from the respective Medical Superintendent / Medical Board showing therein the specific disability.

x I 1

Ex-armed Forces Personnel must send copy of Discharge Certificate with their applications. Govt. / Semi Govt. / Autonomous / Semi Autonomous Bodies employees may apply direct burtheir Departmental Permission Certificates should reach within 30 days of the closing date.

- Applications should be on the prescribed application form obtainable from the listed below branches of the NATIONAL BANK. Application Fee is Rs. 285/- (Rupees Two Hundred Eight live only) for all the candidates. In addition to the application fee, the candidates will have to pay Rs. 15/- (rupees fifteen only) on account of Bank Charges. Separate application form will be required for each advertised category of posts. Application forms obtained other than the specified branches of the National Bank will be considered invalid and such applications will not be entertained. The applications on plain paper or Photostat shall not be accepted. Incomplete and late applications shall also be ignored.
- (vii) Application must be submitted within time as no extra time is allowed for postal transit. The applications if submitted on the last date for receipt of applications must reach the Commission's office by the closing hours.
- (viii). Applicants married to Foreigners are considered only on production of the Govt. Relaxation Orders.
- (ix) No applicant shall be considered in absentia on paper qualifications unless, he/she possesses exceptionally higher qualifications than the minimum prescribed qualification for a particular post(s).
- (x) Govt, reserves the right not to fill any or fill more or less than the advertised post(s).
 - (xi) Candidates who have already availed three chances by physical appearance before the Commission and have failed for the post(s) having one and the same qualifications and seale of pay shall be ineligible.
 - (xii) Experience wherever prescribed shall be counted after the minimum qualifications for the post(s), if not specifically provided otherwise against the advertised post(s).
 - (xiii) In cases where the number of applications received for post(s) are disproportionately higher than the number of available vacancies, shortlisting of the candidates may be done in any one of the following manner:
 - (u) Written Test in the Subject.
 - (b) General Knowledge or Psychological General Ability Test.
 - (e) Academic and for Professional record as the Commission may decide.

SPECIFIED BRANCHES OF THE NATIONAL BANK OF PAKISTAN.

Main Branches of: .

- (i) Parachinar, Mardan, Swabi, Malakand, Shangla, Chitral, Timargara, Daggar, D.I.Khan, Bannu, Karak, Kohat, Hangu, Lakki Marwat, Abbottabad, Haripur, and Manschra.
- (ii) Saddar Road Branch, Tehkal Payan Branch, and G.T Road (Nishtar Abad) Branch
 Peshawar.
- (iii) Tehsil Bazar Branch Charsadda, Nowshera Cantt: Branch, Bank Square Branch Mingora and city Branch Tank.

(Atta Ur Rehman)

Secretary

NWFP Public Service Commission 2-Fort Road Peshawar Cantt: Ph: 9212962

ATTRISTED

ANNEX 6

93)

B"

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA

1

NOTIFICATION

WHERE AS: one Mr. Zafar Iqbal S/O Gul Rehman who himself appointed/adjusted as SST (G) in GMS Maazullan Khwazai District Mohmand vide Notification No. 955-59-File No. 2/A-14/SST(M)/PSC/Apptt: dated 05/03/2012 and No. 3187-3200 A SC (G) 2012 dated 07/03/2012 upon the production of fake/bogus appointment/adjustment order not issued by the Directorate of Education erstwhile FATA Nor by the Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa.

- SST to produce authentic and verified service regard from the concerned authorities, but he failed to comply with the legitimate directions of high ups regarding production of requisite authentic documents/record.
- 3. AND WHERE AS, further an inquiry committee was constituted by the competent authority vide Notification No. 8154-63 dated 04/8/2016 who have gone through the entire case record and it has been proved that the said appointment/adjustment order for the aforesaid post advertised by Public Service Commission Khyber Pakhtunkhwa was turned out fake/bogus.
- 4: AND WHERE AS, it has come to the notice of the competent authority that Mr. Zafar Iqbal S/O Gul Rehman, having no legal status of the said appointment/adjustment order.
- Section-20 & 21 for General clauses Act-1897 as lamended in 1956 and in pursuance of the scrutiny of selection/appointment record in r/o the above mentioned SST which was found fake/bogus, thus his appointment/adjustment Notification No.955-59/File No. 2/A-14/SST(M)/PSC/Apptt: dated 05/03/2012 and No 3187-3200 A1/PSC (G) 2012 dated 07/03/2012 is hereby "DISOWNED" ab initio and with the direction to District Education Officer (concerned) to recover salaries and other allied benefits drawn by Mr. Zafar Iqbail S/O Gul Rehman in the interest of Public Service.

Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

5647-5

Copy forwarded to the:-

dated 4 4 2019

1. Deputy Commissioner, District Mohmand with the request to take legal action.

 District Education Officer District Mohmand with the direction to take necessary steps for the recovery of outstanding amount against fake/bogus SST concerned.

District Account Officer District Mohmand to co-operate in the matter.

4. PS to Secretary Elementary and Secondary Education Khyber Pakhtunkhwa.

5. PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa.

TTESTED

Deputy Director (Estab)
Merged Districts

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

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Senior Law Officer Khyber Pakhtunkhwa Public Service Commission Peshawar

UMS88642632

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 972/2019

Muhammad Tariq.....Appellant

VERSUS

Government of Khyber Pakhtunkhwa & others......Respondents

PARAWISE COMMENTS ON BEHALF OF (RESPONDENT NO. 03)

PRELIMINARY OBJECTIONS:

- 1. The appellant neither applied nor was recommended against any of the advertised posts. He is not a genuine recommendee / selectee of the Public Service Commission in respect of the post.
- 2. That the instant Service Appeal is not maintainable against the replying Respondent No.3.
- 3. That the appellant has malafidely dragged Khyber Pakhtunkhwa Public Service Commission in the instant case.
- 4. That the appellant is misleading this Honorable Service Tribunal.
- 5. That instant Service Appeal is liable to be dismissed with special cost as the same is based on ulterior motives of the appellant.
- 6. Instant service appeal is based on misrepresentation.

ON FACTS:

- **1-2.** Pertains to personal information of the appellant, no comments.
 - 3. That the Khyber Pakhtunkhwa Public Service Commission advertised 1681 posts of SETs/SSTs vide Advertisement No. 01/2009 dated 26.01.2009 with the following qualifications:

<u>QUALIFICATION:</u> For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics –A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 35 years. PAY SCALE: BPS-16 ELIGIBILITY: Male.

ALLOCATION:

			Zone-3	Zone-4	Zone-5
420	280	281	280	210	210

(Annex-A)

Furthermore list of the candidates who were recommended to Government for appointment is (Annex-B).

- 4. Incorrect. The appellant was not recommended against any of the said posts. List of the genuine recommendees is annexed as **B**. The appellant has not provided any proof of his recommendation by the Public Service Commission.
- **5-8.** Not pertaining to Public Service Commission.

GROUNDS.

- **A-C.** Not pertaining to Public Service Commission.
- D. Incorrect. The appellant concerned is not a recommendee / selectee of the Khyber Pakhtunkhwa Public Service Commission as explained in Para 4.
- E. Not pertaining to Public Service Commission.
- F. The appellant may not be allowed to raise any other grounds during the course of arguments against the replying respondent Khyber Pakhtunkhwa Public Service Commission.

It is, therefore, most humbly prayed that in light of above submissions the instant Service Appeal may kindly be dismissed with cost.

CHAIRMAN
KHYBER PAKHTUNKHWA
PUBLIC SERVICE COMMISSION
PESHAWAR
(RESPONDENT NO.03)

3

AFFIDAVIT

Stated on oath that the contents of this Para wise comments are true and correct & nothing has been concealed from this Honorable tribunal.

DEPONENTS

CHAIRMAN

KHYBER PAKHTUNKHWA

PUBLIC SERVICE COMMISSION

PESHAWAR

(RESPONDENT NO.03)

NWFP PUBLIC SERVICE COMMISSION

2-Fort Road Peshawar Cantt:

Website: www.nwfppsc.gov.pk

Dated: 26-01-2009

Advertisement No. 01 / 2009.

Applications are invited for the following posts from Pakistani citizens of N.W.F.P/F.A.T.A domicile by 26-02-2009 (13-03-2009 for candidates from abroad). Incomplete applications and applications without supporting documents required to prove the claim of the candidates shall also be rejected without intimation to the candidates.

(S.No. 52) Sixteen Hundred Eighty One (1681) Posts of Male SETs. /S.S.Ts (Both Science & Arts) (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics –A or Mathematics—B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 35 years. PAY SCALE: BPS-16 ELIGIBILITY: Male.

Merit	Zone-1	Zone-2	Zone-3	7000	-
420	280	281	280	Zone-4	Zone-5
÷			200	210	210

(Atta Ur Rehman)

Secretary

NWFP Public Service Commission 2-Fort Road Peshawar Cantt: Ph. 9212962 Receipt

Title . M. Taria VS Govt 07 KP Appeal No-972/2019

bron the KPPSC Representative as per court order

> Hame M. Taria Signature M. Vand. Dated. 22/7/2020