

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 15605/2020

Date of institution ..... 30.11.2020

Shakil Ahmad ASST (BPS-16) at GHS Totaki District Karak.

VERSUS

District Education Officer Male District Karak and one other.


ORDER  
17.09.2021

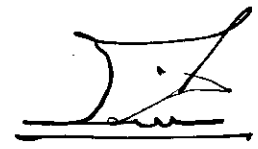
Ms. Roeda Khan, Advocate, for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Learned counsel for the appellant stated at the bar that as the grievance of the appellant has been redressed, therefore, as per instruction of the appellant she wants to withdraw the instant service appeal, hence the same may be dismissed as withdrawn. In this respect, written endorsement of learned counsel for the appellant obtained at the margin of order sheet.

In light of the above, the appeal in hand stands dismissed as withdrawn. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED  
17.09.2021

  
(ATIQ-UR-REHMAN WAZIR)  
MEMBER (EXECUTIVE)

  
(SALAH-UD-DIN)  
MEMBER (JUDICIAL)

*I want to withdraw  
the instant Appeal*



**OFFICE OF THE DISTRICT EDUCATION OFFICER  
(MALE) KARAK**

Address N/A.

**OFFICE ORDER**

In light of the statement submitted in Service Tribunal, KPK by the District Secondary Education Khyber Pakhtunkhwa, Peshawar in service Appeal No 15605 Mr. Ijaz Ahmad, SST (P/M), GHS Totaki District Karak versus DEO (Male) Karak & others, the entire vide Directorate of Elementary & Secondary Education Kpk, Peshawar Endst: No 4 16/06/2020 Corrigendum/SST(M)/Karak. Dated Peshawar the 16/06/2020 is still intact & the place of posting S No 2 Mr Ijaz Ahmad, SST (P/M) may be read as GHS Mitha Khel instead of GHS Totaki

**Note:**

- 1 No TADA is allowed.
- 2 Charge report should be submitted to all concerned

**DISTRICT EDUCATION OFFICER  
(MALE)KARAK**

Endst No 3627-33 /

Dated Karak the 13/09/2021

Copy forwarded for information and necessary action to the:-

- 1 PA to the Director E & SE Education Khyber Pakhtunkhwa Peshawar.
- 2 Registrar Service Tribunal KPK, Peshawar w/r to Appeal No. & Title cited above.
- 3 District Account Officer Karak.
- 4 Principal/ Head Master Concerned.
- 5 DMO Karak.
- 6 Master file.

**DISTRICT EDUCATION OFFICER  
(MALE)KARAK**



**OFFICE OF THE DISTRICT EDUCATION OFFICER  
(MALE) KARAK**

Address: KDA Karak

**OFFICE ORDER**

In light of the statement submitted in Service Tribunal, KPK by the Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar in service Appeal No. 15605/2021 titled Shakeel Ahmad, SST (P/M), GHS Totaki District Karak versus DEO (Male) Karak & others, the corrigendum issued vide Directorate of Elementary & Secondary Education Kpk, Peshawar Endst:No. 4754-57/F.No. Corrigendum/SST(M)/Karak. Dated Peshawar the 16/06/2020 is still intact & the place of posting for S.No.2 Mr. Ijaz Ahmad, SST (P/M) may be read as GHS Mitha Khel instead of GHS Totaki.

**Note:**

1. No TA/DA is allowed.
2. Charge report should be submitted to all concerned.

**DISTRICT EDUCATION OFFICER  
(MALE)KARAK**

Endst No. 3627-33 /

Dated Karak the 13 / 09 /2021

Copy forwarded for information and necessary action to the:-

1. PA to the Director E & SE Education Khyber Pakhtunkhwa Peshawar.
2. Registrar Service Tribunal KPK, Peshawar w/r to Appeal No. & Title cited above.
3. District Account Officer Karak.
4. Principal/ Head Master Concerned.
5. DMO Karak.
6. Master file.

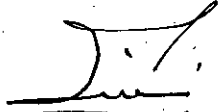
  
13/9/21  
**DISTRICT EDUCATION OFFICER  
(MALE)KARAK**

10.09.2021

Appellant present. Mr. Sher Nawab, Superintendent alongwith respondent No. 1 Mr. Sheraz Ahmed, DEO (Karak) and Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Appellant submitted rejoinder, copy of which handed over to learned Deputy District Attorney. Learned counsel for the appellant is absent due to strike of lawyers, therefore, to come up for arguments before the D.B on 17.09.2021.

  
(ATIQ-UR-REHMAN WAZIR)  
MEMBER (EXECUTIVE)

  
(SALAH-UD-DIN)  
MEMBER (JUDICIAL)

17.08.2021

Since 17.08.2021 has been declared as Public holiday on account of Moharram, therefore, case is adjourned to 30.08.2021 for the same as before.

  
Reader

30.08.2021

Due to summer vacations, the case is adjourned to 08.09.2021 for the same as before.

  
READER

08.09.2021

Appellant alongwith Miss Roaeda Khan, Advocate present. M/S Atiq-ur-Rehman Deputy DEO and Hussain Ullah Assistant alongwith Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Learned Deputy District Attorney sought adjournment on the ground that the brief of the instant appeal was handed over to him very lately, therefore, he has not made preparation for arguments. Adjourned. To come up for arguments before the D.B on 10.09.2021.



(ATIQ UR REHMAN WAZIR)  
MEMBER (EXECUTIVE)




(SALAH-UD-DIN)  
MEMBER (JUDICIAL)

19.03.2021

Counsel for the appellant present. Addl: AG for respondents present.

Written reply not submitted. Learned AAG requested for time to contact the respondents for requisite reply. The request is being genuine is allowed. However, learned AAG is required to ensure submission of reply on the next date.

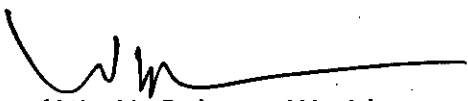
Adjourned to 05.04.2021 before S.B.

  
(Mian Muhammad)  
Member (E)

05.04.2021

Appellant in person present. Mr. Kabirullah Khattak learned Addl. AG alongwith Sher Nawab ADEO for respondents present.

Representative of respondents submitted reply/comments which is placed on file. To come up for rejoinder if any, and arguments on 23.04.2021 before S.B.

  
(Atiq-Ur-Rehman Wazir)  
Member (E)

23.04.2021

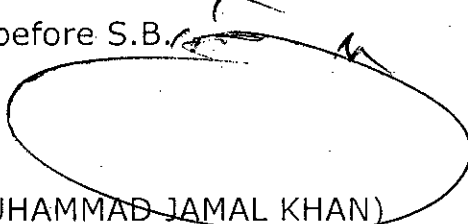
Due to demise of the Worthy Chairman, the Tribunal is non-functional, therefore, case is adjourned to 17.08.2021 for the same as before.

  
Reader

14.01.2021

Counsel for appellant is present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents is also present.

Neither written reply on behalf of respondent submitted nor representative of the department is present, therefore, learned Additional Advocate General is directed to contact the respondents and furnish written reply/comments on the next date of hearing. Adjourned to 10.02.2021 on which date file to come up for written reply/comments before S.B.

  
(MUHAMMAD JAMAL KHAN)  
MEMBER (JUDICIAL)

10.02.2021

Counsel for appellant present.

Kabir Ullah Khattak learned Additional Advocate General for respondents present.

Written reply of respondents is still awaited. Representative of respondents is not in attendance. Case is adjourned on the request of learned A.A.G for submission of written reply/comments. To come up for written reply/comments on 26.02.2021 before S.B.

  
(Rozina Rehman)  
Member (J)

26.02.2021

Counsel for appellant is present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents is also present.

Neither written reply on behalf of respondents submitted nor representative of the department is present, therefore, learned Additional Advocate General is directed to contact the respondents and furnish written reply/comments on the next date of hearing as a last chance. Adjourned to 19.03.2021 on which date file to come up for written reply/comments before S.B.

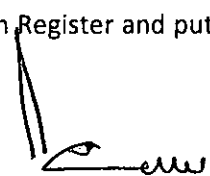

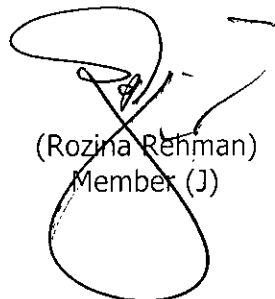
  
(Muhammad Jamal Khan)  
Member

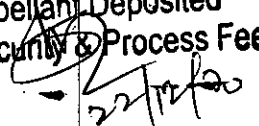
Form- A

# FORM OF ORDER SHEET

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

Case No.- 15605 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	11/12/2020	<p>The appeal of Mr. Shakeel Ahmad resubmitted today by Roeda Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-		<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>21/12/2020</u>.</p> <p> CHAIRMAN</p>
	21.12.2020	<p>Appellant present through counsel. Preliminary arguments heard. File perused.</p> <p>Points raised need consideration. Admitted to regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to respondents for written reply/comments. To come up for written reply/comments on 14.01.2021 before S.B.</p> <p> (Rozina Rehman) Member (J)</p>

Appellant Deposited  
Security & Process Fee  
  
22/12/20




The appeal of Mr. Shakeel Ahmad received to-day i.e. on 30.11.2020 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

1. Annexure A of the appeal is incomplete which may be completed.
2. Annexure A of the appeal may be attested.
3. Vakalatnama in respect of the appellant is not attached with the appeal which may be placed on it.

No. 3942 /S.T.

Dt. 01/12 /2020

*for*  
  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Miss. Roeeda Adv.  
High Court, Peshawar.

*objection No 1 To 3  
has been Removed*



Objection no. 1 is still stand the appeal is returned again to the counsel for the appellant for completion and resubmission with 15 days.


No. 3995 /S.T.

Dated 04/12 /2020

  
Registrar  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

Roeeda Khan Adv. Peshawar

*Re-submitted  
After Removal of objection*

  
11/12/2020

**BEFORE THE HON'BLE SERVICE TRIBUNAL**  
**PESHAWAR**

In Re S.A No. 15605 /2020

Shakil Ahmad

***VERSUS***

1. District Education Officer Male District & others

**INDEX**

S#	Description of Documents	Annexure	Pages
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6.	Copies of departmental appeal and corrigendum order	"B & C"	11 to 12
7.	Wakalatnama		

  
APPELLANT

Through

  
**Roeda Khan**

Advocate, High Court  
Peshawar.

(11)

**BEFORE THE HON'BLE SERVICE TRIBUNAL**  
**PESHAWAR**

Khyber Pakhtunkhwa  
Service Tribunal

In Re S.A No. 15605/2020

Diary No. 15783

Dated 30/11/2020

Shakil Ahmad ASST (BPS-16) at GHS Totaki  
District Karak

**Appellant**

***VERSUS***

1. District Education Officer Male District Karak
2. Director Elementary & Secondary education KPK  
Peshawar.

**Respondents**

**SERVICE APPEAL U/S-4 OF THE KHYBER  
PAKHTUNKHWA SERVICES TRIBUNAL ACT  
1974 FOR GIVEN APPROPRIATE DIRECTION  
TO RESPONDENT DEPARTMENT FOR THE  
POSTING/TRANSFER OF THE APPELLANT AS  
IN THEIR RESPECTIVE UNION COUNSEL E.I  
GCMHS CHOKARA INSTEAD GHS TOTAKI.**

Filed to-day  
30/11/2020  
Registrar  
**Prayer:-**

**ON ACCEPTANCE OF THIS SERVICE  
APPEAL THE APPELLANT MAY KINDLY  
BE POSTED/TRANSFER AS IN THEIR  
RESPECTIVE UNION COUNSEL E.I  
GCMHS CHOKARA INSTEAD GHS  
TOTAKI ALONG WITH ALL BACK  
BENEFITS.**

Re-submitted to -day  
and filed.

Registrar  
11/12/2020

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Respectfully Sheweth,

1. That the Appellant has been appointed as SST (BPS-16) on 13.05.2020. (Copy of appointment order is attached as annexure "A").
2. That the appellant performed his duty regularly and with full devotion and no complaint whatsoever has been made against the appellant.
3. That the appellant belongs to Union Counsel Chokara District Karak and was on the top of on merit list, as per prevailing rules and regulation as well as per merit the top selected has to be appointed in their respective union counsel.
4. That instead of prevailing rules and regulation the appellant has been posted at other union counsel which is 62 kilometer away from the appellant although two posts were lying vacant in Tehsil Takht Nusrati in which one was laying vacant in the respective union counsel Chokara of the appellant which is one kilometer away from the hometown of the appellant.

5. That the appellant submitted a departmental appeal to respondent department on 28.05.2020 in response of which a corrigendum has been issued where by the direction have been given to respondent department for posting/transferring the appellant to their respective union counsel which has been received the appellant on 20.11.2020. (Copies of departmental appeal and corrigendum order are attached as annexure "B & C").
6. That feeling aggrieved the Appellant prefers the instant service appeal before this Hon'ble Tribunal on the following grounds inter alia:-

**GROUND:-**

- A. That the appellant has not been treated according to law and rules and mandatory provision of law has been violated by the respondent department.
- B. That as per the prevailing rules and regulations and was on the top of merit list the appellant is entitle for posting in their respective union counsel.
- C. That the place of posting was 62 kilometers away from the appellant which is very difficult to the appellant and there is

already one vacant post laying in the union counsel of the appellant.

D. That any other ground not raised here may graciously be allowed to be raised at the time full of arguments on the instant service appeal.

*It is therefore, most humbly prayed that on acceptance of this appeal the appellant may kindly be posted/transfer as in their respectable union counsel e.i GCMHS Chokara instead GHS Totaki along with all back benefits.*

*Any other relief not specifically asked for may also graciously be extended in favour of the Appellant in the circumstances of the case.*



APPELLANT

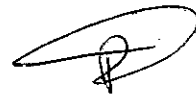
Through



**Roeeda Khan**  
Advocate, High Court  
Peshawar.

**NOTE:-**

As per information furnished by my client, no such like appeal for the same petitioner, upon the same subject matter has earlier been filed, prior to the instant one, before this Hon'ble Tribunal.



Advocate.

(5)

**BEFORE THE HON'BLE SERVICE TRIBUNAL**  
**PESHAWAR**

In Re S.A No. \_\_\_\_\_/2020

Shakil Ahmad

***VERSUS***

District Education Officer Male District & others

**AFFIDAVIT**

I, Shakil Ahmad ASST (BPS-16) at GHS Totaki District Karak, do hereby solemnly affirm and declare that all the contents of the **instant appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Court.



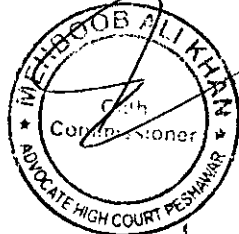
**DEPONENT**

***Identified by:***



**Roeeda Khan**  
Advocate High Court  
Peshawar.

**Attested**



28/11/2020

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**BEFORE THE HON'BLE SERVICE TRIBUNAL**  
**PESHAWAR**

In Re S.A No. \_\_\_\_\_/2020

Shakil Ahmad

***VERSUS***

District Education Officer Male District & others

**ADDRESSES OF PARTIES**

***PETITIONER.***


Shakil Ahmad ASST (BPS-16) at GHS Totaki  
District Karak

**ADDRESSES OF RESPONDENTS**

1. District Education Officer Male District Karak
2. Director Elementary & Secondary education KPK  
Peshawar.

  
**APPELLANT**

Through

  
**Roeeda Khan**  
Advocate, High Court  
Peshawar.



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**BEFORE THE HON'BLE SERVICE TRIBUNAL**  
**PESHAWAR**

In Re S.A No. \_\_\_\_\_/2020

Shakil Ahmad

***VERSUS***

District Education Officer Male District & others

**APPLICATION FOR CONDONATION OF DELAY (if any)**

***Respectfully Sheweth,***

Petitioner submits as under:

1. That the above mentioned appeal is filing before this Hon'ble Tribunal in which no date is fixed for hearing so far.
2. That the place of posting was 62 kilometers away from the appellant which is very difficult to the appellant and there is already one vacant post laying in the union counsel of the appellant.
3. That as per the prevailing rules and regulations and was on the top of merit list the appellant is entitle for posting in their respective union counsel.
4. That the appellant properly submitted departmental appeal against the posting order dated 13.05.2020 in response of which a corrigendum has been issued whereby the

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direction has been given to respondent department for the posting of the appellant to their respective Union Council e.i GCM SH Chokara but despite the given direction the appellant has not been posted in his own union council by the respondent department. Which has been received to the appellant on 20.11.2020.

5. That there are many judgment of the superior court that limitation has not becomes a huddle in way of justice.

**Grounds:**

- a. That the impugned orders are void order and no limitation run against the void orders. It has been passed without the fulfilling the codal formalities.
- b. That the impugned is also void because no opportunity a personal hearing has been provided to the appellant.
- c. That there are number of precedents of the Supreme Court of Pakistan which provides that the cases shall be decided on merits rather than technicalities.

**It is, therefore, requested that the limitation period (if any) may kindly be condone in the interest of justice.**

  
*Appellant*

Through



**Roeeda Khan**

Advocate, High Court

Peshawar.

ITEM NO.3

SST's (Male) Karak

**APPOINTMENT OF SECONDARY SCHOOL TEACHERS (P/M) MALE**  
**BPS-16 ON ADHOC BASIS UNDER 25% OPEN QUOTA**

Sr	Roll No	Name	D/o Birth	CNIC	Permanent Address	Acad. Marks	FTS Marks	Total Marks	Remarks
1	40298104	Shakeel Ahmad S/O Amir Muhammad	17.4.1991	14203- 8170394-1	Vill: Awazi Banda Tehsil T.Nasrati District Karak	56.91	88	144.91	Appointed and adjusted at GHS Tolaki
2	40275775	Adil Murad S/O Irfan Badshah	12.4.1991	14203- 0478564-5	Vill: Tattar, Tehsil Tahsil Nasrati Distt: Karak	57.53	87	144.53	Appointed and adjusted at GHS Tahsil-e-Nasrati
3	40298145	Sufian Ullah S/O Ascer Zada	15.4.1988	14202- 8080031-3	Karak S/O, Karak Near OGDCL Office Main Hiday Road Distt: Karak	64.25	77	141.25	Appointed and adjusted at GHS Sabir Abad
4	40298343	Ijaz Ahmad S/O Muhammad Rahim	28.0.1988	14202- 1274837-0	Mansoor Stationary and Book Center Karak City Distt: Karak	56.93	84	140.93	Appointed and adjusted at GCMHS Chokara

**Terms and conditions:-**

- No TA/DA is allowed.
- Charge reports should be submitted to all concerned in duplicate.
- Appointment is purely on temporary & contract basis initially for one year with immediate effect.
- They should not be handed over charge if they exceed 35 years or below 19 years of age. Age relaxation case may be submitted to competent authority.
- If any meritorious candidate is deprived of appointment by this order, and the competent authority accepts his appeal, the appointment order of the low merit candidate will be with-drawn, and the adjustment order will be reviewed according to the merit.
- Appointment is subject to the condition that the certificates/documents must be verified from the concerned authorities by the DFO (concerned), anyone found producing bogus certificate will be reported to the law enforcing agencies for further action.
- Their services are liable to termination on one month's notice from either side. In case of resignation without notice their one month pay/allowances shall be forfeited to the Government.
- Pay will not be drawn until and unless a certificate to the effect by DEO(concerned)-to the effect that their certificates are verified and found correct and genuine.
- They should join their post within 15 days of the issuance of this notification. In case of failure to join the post within 15 days, their appointment will expire automatically and no subsequent appeal shall be entertained.
- Health and Age certificate should be produced from the Medical Superintendent concerned before taking over charge.
- They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- Their services shall be terminated at any time, in case his performance is found unsatisfactory during the contract period.
- The appointment is made on school based. They will have to serve at the place of posting, and their services are not transferable to any other station.

(15)

**SSTs (Male) Karak**

14. Before handing over charge, once again their documents may be checked by the Headmaster/Principal (Concerned) and if they do not acquired the relevant qualifications as per rules, they may not be handed over the charge of the post.

15. The appointees shall take nine (09) months mandatory training at RITE Or PITE.

**(Hafiz Dr. Muhammad Ibrahim)**

**Director**

Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

Endst: No 1543-48

/ File No.5/A-14/SST/Adhoc Apptt: (BPS-16) Dated Peshawar the 13/5/2020

Copy forwarded for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar
2. District Education Officer (M) Karak
3. District Accounts Officer Karak with the request to release their pay on production of duly Certificate duly countersigned by DEO concerned
4. Officials Concerned
5. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department
6. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar
7. M/File

**Deputy Director**  
Elementary & Secondary Education  
Khyber Pakhtunkhwa

A115/24

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Ahmed (B)

(10)

To The DEO District Education Officer (MALE) Karak

Subject REQUEST FOR APPOINTMENT WITHIN THE TEHSIL AS PER ROLED

Dear sir,

It is hereby brought to your kind notice , that in the recent appointment list against the post of SST BPS-16 notified on 2019. I was on the top of list against the merit. As per prevailing rules and regulation as well as per merit the top selected are to be appointed in their respective union. There are four vacant posts of SST Maths, Physics in our district (KARAK) respectively. Two posts were lying vacant in Tehsil Takhti-E-Nasrati. One of the two post of our Tehsil was lying vacant in my respective Union i.e Chokara which is 1 KM away from my hometown.

Unfortunately setting aside on the rules and regulation a nominee laying at serial No 4 in the merit list has been appointed in my own union council, which is against the prevailing rules and regulation and I being on the top has been given the post in another Tehsil i.e B.D SHAH. Such kind of injustice from your good office as worth astounding.

Therefore your favour is very earnestly requested that the anomaly may kindly please be rectified and I may please be posted it my own Union Council. i.e Chokara.

I shall be highly obliged and shall pray for your long life and prosperity.

Thanks

Date: 28/05/2020

Shakeel

Your's Obediently

Shakeel

Ahmed

Adress: Village Awazi Banda  
P/O Bogara Tehsil Takht-E-Nasrati Disst Karak.

Cell No: 03475127121

1. Copy to DEO (MALE) Karak.
2. Copy to Director of Elementary & Secondary Education KPK Peshawar.
3. Copy to Sectary of Elementary & Secondary Education KPK Peshawar.

ALL  
RM  
[Signature]



AW-11 C-11 (12)

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

**CORRIGENDUM.**

Please read the School Name in respect of the following SSTs as mentioned against each, in the Appointment Order of District Karak, issued by this office vide No. 1543-48 dated 13-05-2020.

S.No	Name	Present Station	To be read as
1	Shakeel Ahmad	GHS Totaki	GCMHS Chokara
2	Ijaz Ahmad	GCMHS Chokara	GHS Totaki


The terms and conditions in the aforementioned Appointment Order will remain intact.

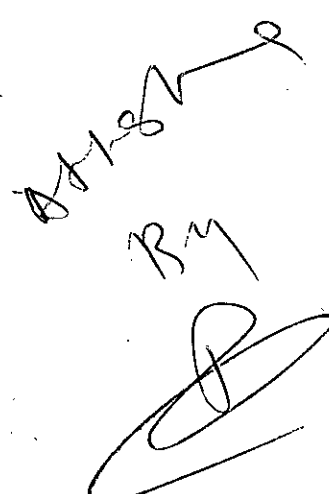
**DIRECTOR**  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar

Endst: No. 4754-57 /F.No. Corrigendum/SST(M)/Karak. Dated Peshawar the 6/6 2020

Copy of the above is to the:-

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

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



بعدالت جناب سوسٹنٹل سول



اسم  
الحول

2020ء منجانب

سید احمد بنام

مورخ

مقدمہ

دعویٰ

جرم

## باعث تحریر آنکد

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ

آن مقام کے لیے روک دیا گیا ہے۔

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق و زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

دستخط  
وکیل

2020ء

27 ماہ نومبر

الرقوم

العبد گواہ العبد

اس کے لئے منظور ہے۔

Accepted by

(R)

مقام

1

**BEFORE THE HONORABLE KHYBER PAKHATUNKHWA SERVICE TRIBUNAL**  
**PESHAWAR.**

Service Appeal No: 15605/2020

**Shakeel Ahmad SST BPS-16 GHS Totaki District Karak .....Appellant.**

**VERSUS**

District Education Officer (Male) Karak & others.....Respondents

**JOINT PARAWISE COMMENTS FOR & ON 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 Tribunal.
- 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 instant Service Appeal is against the prevailing law & rules.
- 7 That the Appellant has been treated as per law, rules & policy.
- 8 That the appeal is not maintainable in its present form.
- 9 That the appeal is bad for mis-joinder & non-joinder of the necessary parties.
- 10 That the instant Service Appeal is barred by law.
- 11 That the Transfer & Posting is the discretionary power of the competent authority in view of the judgment 2008, SCMR Page-531.
- 12 That the competent authority has got jurisdiction and competency to transfer & post a Regular Civil Servant under Section-10 of Civil Servants Act 1973 anywhere in the Province wherever his Service against the SST/ B-16 post are required.

That the appellant wants to stick to the post & station of his choice in the  
dent Department.



## ON FACTS

- 1 That Para-1, needs no comments being pertains to the service record of the appellant against the SST B-16 post vide Notification dated 13-05-2020.
- 2 That Para-2 is incorrect & misleading on the grounds that the appellant is liable to serve the Respondent Department for the salary & others services benefits he is drawing from the E&SE Department.
- 3 That Para-3 is incorrect that the post of the appellant is a provincial Cadre post instead of U/C based post & liable to serve anywhere in the province as and when his services are required by the competent authority under the above cited provision of Law.
- 4 That Para-4 is also incorrect & denied, hence, needs no further comments, ~~is~~ detail reply to this para has been given in para-3 of the present reply by the Respondent Department.
- 5 That Para-5 is incorrect & misleading. The appellant has filed a Departmental appeal dated 28-05-2020 to the Respondent No.1 which was forwarded to the Respondent No.2, *who vide corrigendum order No.4754-57/F.No/Corrigendum/SST(Male)/Karak dated 16-06-2020 with the remarks that the present place of posting of the appellant at GHS Totaki District Karak may be read as GCMHS Chokara with the remarks that the terms & condition of the Notification No.1543-48 dated 13-05-2020 will remain intact. (Copies of the Departmental appeal & Corrigendum order dated 16-06-2020 are Annexure A & B).*
- 6 That Para-6 is also incorrect & denied. Hence the appeal in hand is liable to be dismissed on the following grounds inter alia:-

## GROUND

- A. **Incorrect & not admitted.** The appellant has been treated as per Law, Rules & Policy in the instant case by the Respondent Department. Hence, the claim of the appellant is baseless & liable to be rejected being an employee of provincial Cadre against the SST B-16 post in the Respondent Department.
- B. **Incorrect & not admitted.** On the grounds that the plea regarding the adjustment of the appellant in his own union council against the SST B-16 is illegal & even against the policy being an employee of provincial cadre teaching cadre, whereas, adjustment in union council is made against the PST (M & F) posts only instead of the SST B-16 post as claimed by the appellant.
- C. **Incorrect & not admitted.** Each & every Civil Servant, is legally bound to perform his official duty with due devotion & spirit for the salaries & other allied Service benefits he is drawing from the Govt: treasury & the same

3

D. **Incorrect & not admitted.** The stand of the appellant is without any proof & justification. Hence, deserves to be rejected in view of the above made submissions. However, the Respondents further seek leave of this Honorable Tribunal to submit additional grounds & case law/record at the time of arguments.

In view of the above made submissions, it is requested that this Tribunal may very graciously be pleased to dismiss the instant service appeal with cost in favor of the Respondent Department.

Dated \_\_\_/\_\_\_/2021.

  
DIRECTOR

E&SE Department Khyber  
Pakhtunkhwa, Peshawar.  
(Respondents No: 1 & 2)

**AFFIDAVIT**

**I, Dr. Hayat Khan Asstt: Director (Litigation-II) E&SE Department** do hereby solemnly affirm and declare On oath that the contents of the instant Parawise Comments are true & correct to the best of my knowledge & belief.

  
Deponent

**BEFORE THE HONORABLE KHYBER PAKHATUNKHWA SERVICE TRIBUNAL  
PESHAWAR.**

**Service Appeal No: 15605/2020**

Shakeel Ahmad SST BPS-16 GHS Totaki District Karak.....Applicant

**VERSUS**

District Education Officer (Male) Karak & others..... Respondents

**APPLICATION FOR SUBMISSION OF CORRIGENDUM ORDER DATED 16-06-2020 & ON BEHALF OF  
RESPONDENTS NO: 1-2.**


Respectfully Sheweth :-

The Respondents submit as under:-

1. That the titled case is pending for reply before this Honorable Tribunal, wherein, the appellant is seeking for his adjustment against the SST B-16 post at GCMHS Chokara instead of GHS Totki District Karak as evident from the prayer of the appellant in the titled case.
2. That vide corrigendum order No.4754-57/F.No/corrigendum/SST (M)/Karak dated 16-06-2020 of the Respondent No.2, the appellant has been adjusted at GCMHS Chokara District Karak. Copy of the Order is attached.


**Therefore, in view of the above made submissions, it is requested that this Tribunal may very graciously be pleased to dismiss the instant appeal as the needful has been done by the Respondent No.2 as per prayer of the appellant by posting him at GCMHS Chokara District Karak against the SST B-16 post in the interest of justice please.**

Dated \_\_\_/\_\_\_/2021.

  
**DIRECTOR**  
 E&SE Department Khyber  
 Pakhtunkhwa, Peshawar.  
 (Respondents No: 1 & 2)

**AFFIDAVIT**

**I, Dr. Hayat Khan Asstt: Director (Litigation-II) E&SE** Department do hereby solemnly affirm and declare On oath that the contents of the instant application are true & correct to the best of my knowledge & belief.

  
 Deponent

Ahmed

(5)

A

To The DEO District Education Officer ( ) ak

Subject REQUEST FOR APPOINTMENT WITHIN THE TEHSIL AS PER ROLED

Dear sir,

It is hereby brought to your kind notice , that in the recent appointment list against the post of SST BPS-16 notified on 2019. I was on the top of list against the merit. As per prevailing rules and regulation as well as per merit the top selected are to be appointed in their respective union. There are four vacant posts of SST Maths, Physics in our district (KARAK) respectively. Two posts were lying vacant in Tehsil Takhti-E-Nasrati. One of the two post of our Tehsil was lying vacant in my respective Union i.e Chokara which is 1 KM away from my hometown.

Unfortunately setting aside on the rules and regulation a nominee laying at serial No 4 in the merit list has been appointed in my own union council, which is against the prevailing rules and regulation and I being on the top has been given the post in another Tehsil i.e **B.D SHAH**. Such kind of injustice from your good office as worth astounding.

Therefore your favour is very earnestly requested that the anomaly may kindly please be rectified and I may please be posted it my own Union Council. i.e Chokara.

I shall be highly obliged and shall pray for your long life and prosperity.

Thanks

Date: 28/05/2020

Shakeel

Your's Obediently

Shakeel

Ahmed

Adress: Village Awazi Banda  
P/O Bogara Tehsil Takht-E-Nasrati Disst Karak.

Cell No: 03475127121

1. Copy to DEO (MALE) Karak.
2. Copy to Director of Elementary & Secondary Education KPK Peshawar.
3. Copy to Sectary of Elementary & Secondary Education KPK Peshawar.



DIRECTORATE OF  
EDUCATION, KHYBER

ELEMENTARY & SECONDARY  
EDUCATION, PESHAWAR

CORRIGENDUM.

Please read the School Name in respect of the following SSTs as mentioned against each, in the Appointment Order of District Karak, issued by this office vide No. 1543-48 dated 13-05-2020.

S.No	Name	Present Station	To be read as
1	Shakeel Ahmad	GHS Totaki	GCMHS Chokara ✓
2	Ijaz Ahmad	GCMHS Chokara	GHS Totaki

The terms and conditions in the aforementioned Appointment Order will remain intact.

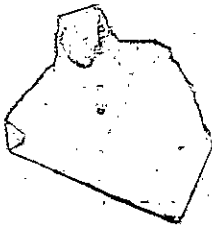
DIRECTOR  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar

Endst: No. 4754-57 /F.No. Corrigendum/SST(M)/Karak. Dated Peshawar the 6/6/2020

Copy of the above is to the:-

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

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





# Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

*Recommend*  
11/1/2022  
Deputy Director  
(Elementary) B.S.E  
Peshawar

## Notification

Consequent upon the advertisement No.INF(P)2281/19, and recommendations of the Departmental Selection Committee, the following candidates are appointed to the post of SST (G), SST (B/C) and SST (P/M) Male in BPS-16 (Rs.18910-1520-64510) @ Rs.18910/- fixed plus usual allowances as admissible under the rules on adhoc basis on contract under the existing policy of the Provincial Government, in Teaching Cadre, on the terms and conditions given below with immediate effect.

### ITEM NO.1 **APPOINTMENT OF SECONDARY SCHOOL TEACHERS (G) MALE BPS-16 ON ADHOC BASIS UNDER 25% OPEN QUOTA**

Sr.	Roll No	Name	D/O Birth	CNIC	Permanent Address	Acad: Marks	NTS Marks	Total Marks	Remarks
1.	40295341	Atif Ur Rehman S/O Anar Khan	27.8.1991	14203-0686916-1	Village Qadre Khel P/O Fateh Sher Band Tehsil Takht e Nasrati	65.35	96	161.35	Appointed and adjusted at GHS Tatar Khel.
2.	40293887	Zahid Ullah S/O Naeem Gul	12.4.1988	14202-8565360-3	Village Wardak P/O Jendral Tehsil Karak	64.87	94	158.87	Appointed and adjusted at GHS Makori
3.	40294459	Shifaat Ur Rehman S/O Umar Farooq	10.12.1991	14203-4162485-5	Vill Jattan Banda PO Insaer Banda Tehsil Takht e Nasrati Karak	68.48	89	157.48	Appointed and adjusted at GHS Gumbali Mino Khel
4.	40294455	Aamir Iqbal S/O Zarjanan	10.3.1985	14202-9087215-1	Village Warana Dali khel PO Warana Teh and distt Karak	61.63	91	152.63	Appointed and adjusted at GHS Latambar
5.	40294723	Arif ullah Khattak S/o Abdul Ghaffar	6.12.1987	14203-2328249-7	Village and PO Muhabati killa Tehsil T.Nasrati	60.95	94	154.95	Appointed and adjusted at GHSS Jandri
6.	40294543	Afrasiab S/O Mir Ahmad Khan	1.5.1993	14203-2369224-9	Vill: 8 PO Manzini Banda	63.30	91	154.30	Appointed and adjusted at GHS Jehangri
7.	40272804	Fahad Shams S/O Shamsul Wahab	9.2.1993	14203-6063899-1	H No. 441 St 17 Sector K2 Phase 3 Hayatabad	62.60	91	153.60	Appointed and adjusted at GHS Shahcedan Chontra
8.	40294687	Atta Ullah S/O Muhammad Noor Shah	1.3.1990	14203-5567425-3	Warana	60.59	93	153.59	Appointed and adjusted at GCMHS Chokara
9.	40294371	Mifayat Ullah S/O Shah Daraz	15.3.1992	14202-9688456-1		63.38	90	153.38	Appointed and adjusted at GHS Tarkha Kohl
10.	40295131	Rizwan Ullah S/O Gul Sali Khan	8.4.1990	14202-7457643-5	Village Toor Dhand Teh PO Karak	62.37	91	153.37	Appointed and adjusted at GHS Dabb
11.	40294757	Asif Raza S/O Nasrullah	23.9.1988	14203-9447897-1	Vill and PO Surati Kalla	56.93	96	152.93	Appointed and adjusted at GHS Sur Dak
12.	40294077	Haroon Iqbal S/O Sar Anjam Khan	2.6.1987	14203-2251548-1	Village Shobli Banda Tehsil and PO Takut e Nawahl Distt Karak	62.76	90	152.76	Appointed and adjusted at GHS Mianki
13.	40294541	Tabish Attique S/O Attique-ur- Rahman	11.4.1991	14203-6368539-3		62.99	89	151.99	Appointed and adjusted at GHS Ghandi Khattak

	40273122	Aamer Ullah Khan S/O Qudrat Ullah	10.4.1995	14203-5203534-3	VIII Marwatan Danda PO Khojaki Kolla Teh T. Nasrati	58.57	93	151.57	Appointed and adjusted at GHS Shah Saleem
15.	40294400	Amjad Iqbal S/O Noor Ali Shah	10.4.1991	14203-1792156-3	VII and PO Tatter Khel Teh T. Nasrati Distt: Karak	59.35	92	151.35	Appointed and adjusted at GMS Mehmood Khel
16.	40295030	Noor Hayat S/O Sher Hayat	3.11.1985	14203-4340955-1	Village Koda Banda po Tehsil Takht e Nasrati District Karak	63.33	88	151.33	Appointed and adjusted at GMS Siraj Khel
17.	40293985	Fahoom Ullah S/O Khilal Tawan	14.8.1986	14202-7682384-5	Mahallah Faqir Khel PO Tehsil and Distt Karak	66.13	85	151.13	Appointed and adjusted at GHS Tarkha Kohl
18.	40294454	Mehlab Alam S/O Farizat Khan	24.3.1988	14203-6887051-1	Village Jattan Banda Teh Takht e Nasrati Dist Karak	63.00	88	151.00	Appointed and adjusted at GHS Kando Khel
19.	40294021	Hamad Ahmad S/O Shahzad Ahmad	29.2.1996	14203-5768409-3	House no. 472, Street No. 15, Sector K-2, Phase 3, Hayat Abad Peshawar	59.84	91	150.84	Appointed and adjusted at GHS Pinda Banda
20.	40294390	Mohammad Yasir S/O Mohammad Siddiq	26.11.1992	14202-3405757-1	Merhan Children Near Distt:Session Courts Karak	56.68	94	150.68	Appointed and adjusted at GHS Tarki Khel
21.	40295453	Mustafa Khurshid Alam S/O Mehboob Alam	16.11.1988	14203-9143691-5	VII and PO Ahmad Abad Tehsil Takht e Nasrati Distt Karak	54.65	96	150.65	Appointed and adjusted at GHS Ghundi Mir Khan Khel

*Rev. Director  
Public Instruction  
Karak*  
17/12/20

**ITEM NO.2 APPOINTMENT OF SECONDARY SCHOOL TEACHERS (BIO/CHE) MALE BPS-16 ON ADHOC BASIS UNDER 25% OPEN QUOTA**

Sr	Roll No	Name	D/o Birth	CNIC#	Permanent Address	Acad: Marks	FTS Marks	Total Marks	Remarks
1	40274764	Akhlaq Hussain S/O Abdur Raziq	19.6.1993	14201-7111151-1	New Colony, Teri, District Karak	60.55	88	148.55	Appointed and adjusted at GHS Teri
2	40296931	Muhammad Imran S/O Muhammad Reayat Gul	30.8.1992	14202-6448548-5	VIII:Gunda Shahbat Khan Tehsil and District Karak	62.28	79	141.28	Appointed and adjusted at GHS Ghundi Mir Khan Khel
3	40296901	Qaiser Hayat S/O Noor Hayat Khan	30.4.192	14202-0221058-3	VIII:Zara Khel PO Sabir Abad Tehsil and District Karak	65.90	75	140.90	Appointed and adjusted at GHS Delli Mela
4	40274653	Asad Ali Mustafa S/O Muhammad Subhan	20.6.1992	14202-3880694-3	VIII:Kalr Wala PO Sabir Abad Tehsil and Distt: Karak	68.76	72	140.76	Appointed and adjusted at GHS Ghunda Shamshaki
5	40297040	Abdul Majid S/O Gul Ajab Khan	10.4.1991	14202-8523158-5	VIII: & PO Dabb Sangini Distt: Karak	68.38	72	140.38	Appointed and adjusted at GHS Tarkha Kohl
6	40297102	Saqib Rauf S/O Muhammad Rauf	2.1.1993	14203-8811476-3	VIII:Saikot Tehsil Teakht-e-Nasrati Distt: Karak	69.37	69	138.37	Appointed and adjusted at GHS Ahmad Abad
7	40296922	Muhammad Younas S/O Pir Nawaz	5.3.1985	14202-6790293-9	VIII: & PO Rahmat Abad Tehsil and Distt: Karak	61.28	76	137.28	Appointed and adjusted at GHS Bogara
8	40274654	Aizer Shah S/O Amjad Hussain Shah	10.4.1993	14201-6134045-7	No.1 Moh: Kheiki, Teri, Teh: BD Shah District Karak	66.43	69	135.43	Appointed and adjusted at GHS Ahmadi Banda

**APPOINTMENT OF SECONDARY SCHOOL TEACHERS (P/M) MALE  
BPS-16 ON ADHOC BASIS UNDER 25% OPEN QUOTA**

Sr	Roll No	Name	D/o Birth	CNIC#	Permanent Address	Acad: Marks	FTS Marks	Total Marks	Remarks
1	40298104	Shakeel Ahmad S/O Amir Muhammad	12.4.1991	14203- 8170394-1	Vill: Awazi Banda Tehsil T.Nasrati District Karak	56.91	88	144.91	Appointed and adjusted at GHS Totaki
2	40275775	Adil Murad S/O Irfan Badshah	12.4.1991	14203- 0428564-5	Vill: Tattar, Tehsil Takhli Nasrati Distt: Karak	57.53	87	144.53	Appointed and adjusted at GHS Takhli-e-Nasrati
3	40298145	Sufian Ullah S/O Aseer Zada	15.4.1988	14202- 8080031-3	Karak Sar, Karak Near OGDCL Office Milan Hinay Road Distt:Karak	64.25	77	141.25	Appointed and adjusted at GHS Sabir Abad
4	40298343	Ijaz Ahmad S/O Muhammad Rahim	28.9.1988	14202- 1274837-9	Mansoor Stationary and Book Center Karak City Distt: Karak	56.93	84	140.93	Appointed and adjusted at GCMHS Chokara

### Terms and conditions:-

- No TA/DA is allowed.
- Charge reports should be submitted to all concerned in duplicate.
- Appointment is purely on temporary & contract basis initially for one year with immediate effect.
- They should not be handed over charge if they exceed 35 years or below 19 years of age. Age relaxation case may be submitted to competent authority.
- If any meritorious candidate is deprived of appointment by this order, and the competent authority accepts his appeal, the appointment order of the low merit candidate will be with-drawn, and the adjustment order will be reviewed according to the merit.
- Appointment is subject to the condition that the certificates/documents must be verified from the concerned authorities by the DEO (concerned), anyone found producing bogus certificate will be reported to the law enforcing agencies for further action.
- Their services are liable to termination on one month's notice from either side. In case of resignation without notice their one month pay/allowances shall be forfeited to the Government.
- Pay will not be drawn until and unless a certificate to the effect by DEO(concerned) to the effect that their certificates are verified and found correct and genuine.
- They should join their post within 15 days of the issuance of this notification. In case of failure to join the post within 15 days, their appointment will expire automatically and no subsequent appeal shall be entertained.
- Health and Age certificate should be produced from the Medical Superintendent concerned before taking over charge.
- They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- Their services shall be terminated at any time, in case his performance is found unsatisfactory during the contract period.
- The appointment is made on school based. They will have to serve at the place of posting, and their services are not transferable to any other station.

*Rev. A. J. J.*  
 Deputy Director  
 (Establishment) ESSE  
 Government of Sindh  
 17/2/22



SSTs (Male) Karak

14. Before handing over charge, once again their documents may be checked by the Headmaster/Principal (Concerned) and if they do not acquired the relevant qualifications as per rules, they may not be handed over the charge of the post.

15. The appointees shall take nine (09) months mandatory training at RITE Or PITE.

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

Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

Endst: No 1543-48

/ File No.5/A-14/SST/Adhoc Apptt: (BPS-16) Dated Peshawar the 13/5/2020

Copy forwarded for information and necessary action to the: -

1. Accountant General Khyber Pakhtunkhwa Peshawar
2. District Education Officer (M) Karak
3. District Accounts Officer Karak with the request to release their pay on production of duty Certificate duly countersigned by DEO concerned
4. Officials Concerned
5. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department
6. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar
7. M/File

*Revoked dated*

*11/7/20*

*Deputy Director  
(Establishment) E&SE  
Khyber Pakhtunkhwa Peshawar*

*[Signature]*  
Deputy Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa

*[Signature]*



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

**CORRIGENDUM.**

Please read the School Name in respect of the following SSTs as mentioned against each, in the Appointment Order of District Karak, issued by this office vide No. 1543-48 dated 13-05-2020.

S.No	Name	Present Station	To be read as
1	Shakeel Ahmad	GHS Totaki	GCMHS Chokara
2	Ijaz Ahmad	GCMHS Chokara	GHS Totaki

The terms and conditions in the aforementioned Appointment Order will remain intact.


**DIRECTOR**

Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar

Endst: No. 4754-57 /F.No. Corrigendum/SST(M)/ Karak. Dated Peshawar the 6/6 2020

Copy of the above is to the:-

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

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



# Complaint History

**KP250820-87191110**

2020-08-25 19:39:33

**STATUS**

Closed - Relief cannot be granted

## Complaint History

2020

SEPT 3  
2020



FROM  
DO Education (M), Karak

**STATUS**

Closed - Relief cannot be granted

**REMARKS**

تبصرہ

Dear complainant, He is adjusted on disable quota. Thank You

AUG 26



FROM



FEEDBACK



## Complaint History

SEPT 29  
2020



FROM

DO Education (M), Karak

STATUS

Closed - Relief cannot be granted

REMARKS

تبصرہ

Dear complainant, he has disability certificate. You are requested to show little restraint and wait little to make you adjusted at nearest station soon. Please co-operate DEO Male Karak in the larger interest of public. This Office will remain thankful always.. Thank You

SEPT 16  
2020



FROM

Secretary, Elementary &  
Secondary Education

STATUS

Forwarded



FEEDBACK



## Complaint History

ZUZU

SEPT 29  
2020



FROM  
DO Education (M), Karak

STATUS

Closed - Partial relief  
granted

### REMARKS

تبصره

Dear complainant, He has disability certificate. He is adjusted at nearest station on the basis of his disability certificate. You are requested to show little restraint in the larger interest of public. And will be adjusted at nearest home station soon In sha Allah. Thank You

SEPT 16  
2020



FROM  
Secretary, Elementary &  
Secondary Education

STATUS

Forwarded



FEEDBACK

## OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KARAK.

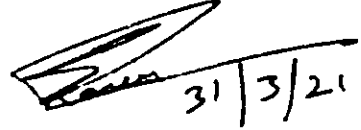
### REVISED PAY RELEASED ORDER:-

Consequent upon notification by the worthy Director Elementary & Education Kh Dated Peshawa 11/09/2020, No.3324-80/PA/03/DF&SE dated Peshawar the 23.10.2020 and No.6297/F.No.35/SST(M) Gen Cases dated Peshawar the 23.12.2020

The competent authority is pleased to release the pay & Allowances conditionally of the following appointed SST (General) on the basis of his duty performance certificate provided by the Headmaster/Prin and countersigned by the DEO(M) Karak w.e.f the date of his taking over charge.

If the documents of anyone declared bogus, he will be reported to law enforcing agencies for necessary action and his appointment will stand withdrawn with immediate effect.

S.No	Name of Official	Father Name	Name of School	Appointment Order No & Date
1	Rizwan Ullah	Gul Sali Khan	GHS, Dabu	1543-48/File No.5/A 4/SST/Adhoc Apptt & BPS- 16/Dated Pesh. the 13.05.2020
2	Mustafa Khurshid Alam	Mehmood Alam	GHS, Surati Killa	Do

  
31/3/21  
DISTRICT EDUCATION OFFICER  
(MALE) KARAK

Dated Karak the 31/3/2021.

Endst. No 1361-64 / Revised P Release SST  
Copy to the:-

1. A to Director Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar  
2. District Accounts Officer Karak  
3. Principal, Head Master Concerned  
4. Manager & Accounts Officer Local Office

DISTRICT EDUCATION OFFICER  
(MALE) KARAK.

**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KARAK**  
**REVISED PAY RELEASE ORDER:**

Consequent upon notification by the worthy Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar vide No.92637-706/PA/03/DE&SE Dated Peshawar the 11/09/2020, No. 3324-80/PA/03/D&SE Dated Peshawar the 23/10/2020 and No. 6297/F.No.35/SST(M) General Cases Dated Peshawar the 23/12/2020.

The competent authority is pleased to release the pay & allowances conditionally of the following newly appointed Qari on the basis of their duty performance certificates provided by the Head Master/Principal and countersigned by DEO (Male) Karak w.e.f the date of their taking over charge.

If the documents of anyone declared bogus, he will be reported to law enforcing agencies for necessary action and his appointment will stand withdrawn with immediate.

S.No	Name of Official	Father Name	Name of School	Appointment Order No. & Date
1	Qaiser Iqbal	Mashal Nawaz	GHS Esak Khumari	1555-62/Apptt:Qari/Tstb:Secy: Dated Karak the 08/05/2020
2	Muhammad Noman Khan	Ajmal Khan	GHSS Kando Khel	-----do-----
3	Aamat Ali Khan	Wahib Gul	GHS Darish Khel	-----do-----
4	Arif Ullah	Gul Abbas Khan	GHS Jatta Ismail Khel	-----do-----
5	Fida Ur Rehman	Saif Ur Rehman	GHS Wargha Banda	-----do-----

**DISTRICT EDUCATION OFFICER  
(MALE) KARAK**

Endst: No. 377-90 /Revise.P.Release./Qari

Dated Karak The 27/10/2021

Copy to the:

1. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Accounts Officer Karak
3. Principals/Head Masters Concerned.
4. Budget & Accounts Officer Local Office

  
27/11/21  
**DISTRICT EDUCATION OFFICER  
(MALE) KARAK**

Directorate of Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar  
No. 21114/F.No. 490/Vol-5/SST(M)/Complaints Karak  
Dated Peshawar the 21/06/2021

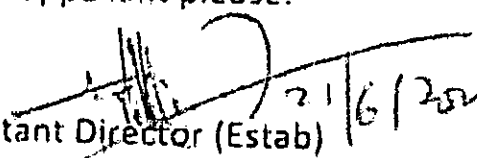
To

The District Education Officer,  
(Male) Karak.

Subject: - COMPLAINT ON PAKISTAN CITIZEN PORTAL

Memo:

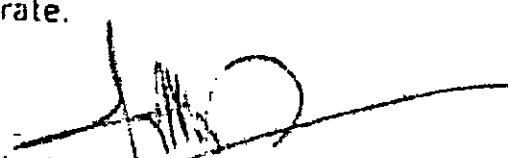
I am directed to refer to the subject cited above and to enclose herewith a complaint bearing No.KP010621-88454483 (AB) with the remarks to resolve the issue under existing rules/Law/Policy, on the analogy of other candidates and avoid discrimination with the appellant please.

  
Assistant Director (Estab)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa

Endst: No. 2415

Copy of the above is to:-

1. PA to Director (E&SE) Local Directorate.

  
Assistant Director (Estab)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa





## Complaint History

AUG 27  
2021



**FROM**

Addl. Director Establishment

**STATUS**

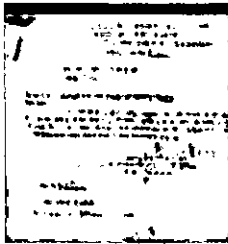
Forwarded



**TO**

DO Education (M), Karak

### ATTACHMENTS



Attachment

### REMARKS

تبصرہ

Respected DEO, instant compliant is submitted at your office vide attached letter in which you were directed to issue pay release order according in respect of Mr. Shakeel Ahmad SST , it further directed that submit compliance report at this office. Regards

AUG 26  
2021



**FROM**

Directorate of Elementary &  
Secondary Education

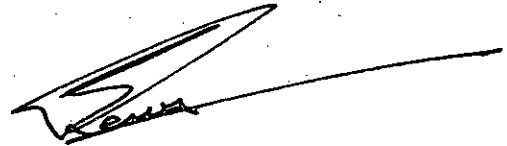
**BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR .**

Service appeal No. 15605 of 2020

**Shakil Ahmad (Appellant)****VERSUS****District Education Officer (Male), Karak & Others.  
(Respondents).****INDEX**

S. No	Description of documents	Annexure	Page
1	Written Statement		1-3
2	Affidavit		4
3	Authority		5

Dated:-----/03/2020

**Respondent No. 1**  
District Education Officer  
(Male), Karak

1

**BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR.**

Service appeal No. 15605 of 2020

**Shakil Ahmad (Appellant)**

**VERSUS**

***District Education Officer (Male), Karak & Others.***  
***(Respondents).***

**Joint Parawise Written Comments of Respondents**

Respectfully Sheweth

Joint Written comments on behalf of Respondents No. 1 & 2  
**Preliminary Objections.**

1. That appellant has got no cause of action to file the instant service appeal.
2. That the above titled service appeal is wrong, incorrect and against the law & facts.
3. That the appellant is estopped to file the instant service appeal by his own conduct . . .
4. That the instant service appeal is not maintainable & entertainable in its present form.
5. That the appellant has not come to this honourable court with clean hands and concealed the facts.
6. That the instant service appeal is liable to be dismissed due to mis-joinder & non-joinder of the party.
7. That the instant service appeal is liable to be dismissed in limine.

**Factual Objections**

1. Para-1 is correct.
2. Para No. 2 pertains to record.
3. incorrect and further reply of Para No. 3 is that the as per policy and rules, the respondents have adjusted / posted the appellant against the vacant post within the district. It is not mandatory / necessary under the law / policy to adjust / posted SST Teacher BPS-16 according to merit position at

the time of issuing appointment order. The SST appointment is to made in district wise not union council wise.

4. Incorrect and further reply of Para No. 4 is that there is no policy / rules to appoint SST candidate in union council but SST candidate is to be appointed and adjusted in district wise against vacant post. There is SST vacant post in Tehsil Takht-e-Nasrati as at the time of appointment, the SST candidates have been adjusted / posted in district wise according to need based school. There is no provision of distance in adjustment of SST candidates.
5. Para No. 5 is incorrect.

**Objection on Grounds.**

- a. Para-A is incorrect and wrong hence denied.
- b. Para No. "B" is incorrect and wrong. There is no district wise policy is existed in appointment of SST candidates. There is no role of top merit in appointment of SST candidates.
- c. Para No. "C" is incorrect and wrong hence denied. There is no provision of distance in appointment. That the respondents have to be adjusted / posted new appointee against vacant post where necessary and need based. The pleas taken by the appellant in adjustment is totally wrong and wrong.
- d. Para No. "D" needs no comments.

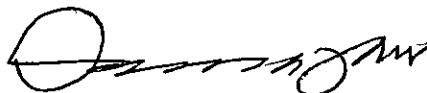
**Prayer**

So it is, therefore, most humbly and respectfully prayed that keeping in view the above mentioned written comments this Hon'able Service Tribunal may very kindly be pleased to dismiss the service appeal.

Dated:-----/02/2021



**Respondent No. 1**  
District Education Officer  
(Male), Karak



**Respondent No. 2**  
Director, Elementary & Secondary  
Department KP Peshawar.

**BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR .**

Service appeal No. 15605 of 2020

**Shakil Ahmad (Appellant)**

**VERSUS**

***District Education Officer (Male), Karak & Others.  
(Respondents).***

**AFFIDAVIT**

I, Sher Nawab, Superintend BPS-17 in DEO (M), Karak do hereby solemnly affirm and declare on oath that all the contents of accompanying joint parawise comments are true and correct to the best of my knowledge and belief, nothing is lie and nothing has been concealed from this Hon'able Service Tribunal

Dated ----/02/2020

Deponent



Sher Nawab  
(Superintendent BPS-17)

Superintendent (BPS-17)  
Dist. Education Officer,  
(Male) Karak

**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE),**  
**KARAK.**

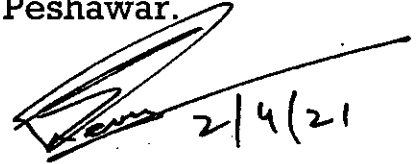
No \_\_\_\_\_

Dated \_\_\_\_\_

---

**AUTHORITY LETTER**

Mr. Sher Nawab , Superintendent BPS-17 in DEO (M), Karak, do hereby authorized to file written comments on behalf of Official respondents in Service Appeal No. 15605 of 2019 titled "**Shakil Ahmad** V.S District Education Officer (Male), Karak & Others Khyber Pakhtunkhwa Service Tribunal, Peshawar.



**District Education Officer (Male)**  
**Karak.**



## Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

*Reviewed*  
11/7/20  
Deputy Director  
(Elementary) BSE  
Peshawar

### Notification

Consequent upon the advertisement No.INF(P)2281/19, and recommendations of the Departmental Selection Committee, the following candidates are appointed to the post of SST (G), SST (B/C) and SST (P/M) Male in BPS-16 (Rs.18910-1520-64510) @ Rs.18910/- fixed plus usual allowances as admissible under the rules on adhoc basis on contract under the existing policy of the Provincial Government, in Teaching Cadre, on the terms and conditions given below with immediate effect.

### ITEM NO.1      APPOINTMENT OF SECONDARY SCHOOL TEACHERS (G) MALE BPS-16 ON ADHOC BASIS UNDER 25% OPEN QUOTA

Sr.	Roll No	Name	D/O Birth	CNIC	Permanent Address	Acad. Marks	NTS Marks	Total Marks	Remarks
1.	40295341	Atif Ur Rehman S/O Anar Khan	27.8.1991	14203-0686916-1	Village Qadre Khel P/O Fateh Sher Band Tehsil Takht e Nasrati	65.35	96	151.35	Appointed and adjusted at GHS Tatar Khel.
2.	40293887	Zahid Ullah S/O Naeem Gul	12.4.1988	14202-8565360-3	Village Wardak P/O Jendral Tehsil Karak	64.87	94	158.87	Appointed and adjusted at GHS Makori
3.	40294459	Shifaat Ur Rehman S/O Umar Farooq	10.12.1991	14202-4162485-5	Vill Jattan Banda PO Inzaer Banda Tehsil Takht e Nasrati Karak	68.48	89	157.48	Appointed and adjusted at GHS Gumbati Mina Khel
4.	40294455	Aamir Iqbal S/O Zarjanaan	10.3.1985	14202-9087215-1	Village Warana Dali khel PO Warana Teh and distt Karak	61.63	91	152.63	Appointed and adjusted at GHS Latambar
5.	40294723	Arif Ullah Khattak S/O Abdul Ghaffar	6.12.1987	14203-2328249-7	Village and PO Muhabati Khila Tehsil T. Nasrati	60.95	94	154.95	Appointed and adjusted at GHSS Jandri
6.	40294543	Afrasiab S/O Mir Ahmad Khan	1.5.1993	14203-2369224-9	Vill: B PO Manzili Banda	63.30	91	154.30	Appointed and adjusted at GHS Jehangri
7.	40272804	Fahad Shams S/O Shamsul Wahab	9.2.1993	14203-6063899-1	H No. 441 St 17 Sector K2 Phase 3 Hayatabad	62.60	91	153.60	Appointed and adjusted at GHS Shaheedan Chontra
8.	40294687	Atta Ullah S/O Muhammad Noor Sheh	1.3.1990	14203-5567425-3	Warana	60.59	93	153.59	Appointed and adjusted at GCMHS Chokara
9.	40294371	Kifayat Ullah S/O Shah Daraz	15.3.1992	14202-9688456-1		63.38	90	153.38	Appointed and adjusted at GHS Tarkha Kohi
10.	40295131	Rizwan Ullah S/O Gul Saif Khan	8.4.1990	14202-7457643-5	Village Toor Dhand Teh PO Karak	62.37	91	153.37	Appointed and adjusted at GHS Dabb
11.	40294757	Asif Raza S/O Nasrullah	23.9.1988	14203-9447897-1	Vill and PO Surati Kalla	56.93	96	152.93	Appointed and adjusted at GHS Sur Dak
12.	40294077	Haroon Iqbal S/O Sar Anjam Khan	2.6.1987	14203-2251548-1	Village Shobli Banda Tehsil and PO Takut e Nawahl Distt Karak	62.76	90	152.76	Appointed and adjusted at GHS Mianki
13.	40294541	Tabish Attique S/O Attique-ur- Rahman	11.4.1991	14203-6368539-3		62.99	89	151.99	Appointed and adjusted at GHS Ghandi Khattak

	40273122	Aamer Ullah Khan S/O Qudrat Ullah	10.4.1995	14203-5203534-3	VIII Marwala Banda PO Khojaki Kalla Teh T. Nasrati	58.57	93	151.57	Appointed and adjusted at GHSS Shah Saleem
15.	40294400	Amjad Iqbal S/O Noor All Shah	10.4.1991	14203-1792156-3	VII and PO Tarter Khel Teh T. Nasrati Distt: Karak	59.35	92	151.35	Appointed and adjusted at GMS Mehmood Khel
16.	40295030	Noor Hayat S/O Sher Hayat	3.11.1985	14203-4340955-1	Village Kada Banda po Tehsil Takht-e-Nasrati District Karak	63.33	88	151.33	Appointed and adjusted at GMS Siraj Khel
17.	40293985	Faheem Ullah S/O Khial Tawan	14.8.1986	14202-7682384-5	Mohallah Faqr Khel PO Tehsil and Distt Karak	66.13	85	151.13	Appointed and adjusted at GHS Tarkha Kohi
18.	40294454	Mehrab Alam S/O Farizat Khan	24.3.1988	14203-6887051-1	Village Jattan Bandu Teh Takht-e-Nasrati Dist Karak	63.00	88	151.00	Appointed and adjusted at GHS Kando Khel
19.	40294021	Hamad Ahmad S/O Shahzad Ahmad	29.2.1996	14203-5768409-3	House no. 472, Street No. 15, Sector K-2, Phase 3, Hayat Abad Peshawar	59.84	91	150.84	Appointed and adjusted at GHS Palinda Banda
20.	40294390	Mohammad Yasir S/O Mohammad Siddiq	26.11.1992	14202-3405757-1	Merman Children Near Distt: Sestlan Courts Karak	56.68	94	150.68	Appointed and adjusted at GHS Tarki Khel
21.	40295453	Mustafa Khurshid Alam S/O Mehboob Alam	16.11.1988	14203-9143691-5	VIII and PO Ahmad Abad Tehsil Takht-e-Nasrati Distt Karak	54.65	96	150.65	Appointed and adjusted at GHS Kalla

ITEM NO. 2

**APPOINTMENT OF SECONDARY SCHOOL TEACHERS (BIO/CHE)  
MALE BPS-16 ON ADHOC BASIS UNDER 25% OPEN QUOTA**

Sr	Roll No	Name	D/o Birth	CNIC#	Permanent Address	Acad: Marks	FTS Marks	Total Marks	Remarks
1	40274764	Akhlaq Hussain S/O Abdur Raziq	19.6.1993	14201-7111151-1	New Colony, Teri, District Karak	60.55	88	148.55	Appointed and adjusted at GHS Teri
2	40296931	Muhammad Imran S/O Muhammad Reayat Gul	30.8.1992	14202-6448548-5	VIII:Gunda Shahbaz Khan Tehsil and District Karak	62.28	79	141.28	Appointed and adjusted at GHS Ghundi Mir Khan Khel
3	40296901	Qaiser Hayat S/O Noor Hayat Khan	30.4.1992	14202-0221058-3	VIII:Zara Khel PO Sabir Abad Tehsil and District Karak	65.90	75	140.90	Appointed and adjusted at GHS Dell Mela
4	40274653	Asad Ali Mustafa S/O Muhammad Subhan	20.6.1992	14202-3880694-3	VIII:Kair Wata PO Sabir Abad Tehsil and Distt: Karak	68.76	72	140.76	Appointed and adjusted at GHS Ghunda Shamshaki
5	40297040	Abdul Majid S/O Gul Ajab Khan	10.4.1991	14202-8523158-5	VIII: & PO Dabb Sangini Distt: Karak	68.38	72	140.38	Appointed and adjusted at GHS Tarkha Kohi
6	40297102	Saqib Rauf S/O Muhammad Rauf	2.1.1993	14203-8811476-3	VIII:Salkot Tehsil Teakht-e-Nasrati Distt: Karak	69.37	69	138.37	Appointed and adjusted at GHS Ahmad Abad
7	40295922	Muhammad Younas S/O Pir Nawaz	5.3.1985	14202-6790293-9	VIII: & PO Rahmat Abad Tehsil and Distt: Karak	61.28	76	137.28	Appointed and adjusted at GHS Bogara
8	40274654	Aliak Shah S/O Amjad Hussain Shah	10.4.1993	14201-6134045-7	No.1 Moh: Khelki, Teri, Teh: DD Shah District Karak	66.43	69	135.43	Appointed and adjusted at GHS Ahmad Banda

Revalidated  
Deputy Director  
Education  
Karak  
17/2/20



**SSTs (Male) Karak**  
**APPOINTMENT OF SECONDARY SCHOOL TEACHERS (P/M) MALE**  
**BPS-16 ON ADHOC BASIS UNDER 25% OPEN QUOTA**

ITEM NO. 3

Sr	Roll No	Name	D/O Birth	CNIC#	Permanent Address	Acad: Marks	FTS Marks	Total Marks	Remarks
1	40298104	Shakeel Ahmad S/O Amir Muhammad	12.4.1991	14203-8170394-1	Vill: Awarri Banda Tehsil: Nasrai District: Karak	56.91	88	144.91	Appointed and adjusted at GHS Totahi
2	40275775	Adil Muzad S/O Khan Badshah	12.4.1991	14203-0428564-5	Vill: Totari, Tehsil: Tahiti Nasrai District: Karak	57.53	87	144.53	Appointed and adjusted at GHS Tahiti-e-Nasrai
3	40298145	Sujan Ullah S/O Asger Zada	15.4.1988	14202-8080021-3	Karak Sar, Karak Near OGDCL Office Mian Minay Road Dist: Karak	64.25	77	141.25	Appointed and adjusted at GHS Sabh Abad
4	40298343	Ijaz Ahmad S/O Muhammad Rahim	28.9.1988	14202-1274837-9	Mansoor Stationary and Book Center Karak City Dist: Karak	56.93	84	140.93	Appointed and adjusted at GCMHS Chokara

*Review*  
 Deputy Director  
 Establishment Case  
 11/12/2022

**Terms and conditions:-**

1. No TA/DA 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 with immediate effect.
4. They should not be handed over charge if they exceed 35 years or below 19 years of age. Age relaxation case may be submitted to competent authority.
5. If any meritorious candidate is deprived of appointment by this order, and the competent authority accepts his appeal, the appointment order of the low merit candidate will be with-drawn, and the adjustment order will be reviewed according to the merit.
6. Appointment is subject to the condition that the certificates/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.
7. Their services are liable to termination on one month's notice from either side. In case of resignation without notice their one month pay/allowances shall be forfeited to the Government.
8. Pay will not be drawn until and unless a certificate to the effect by DEO (concerned) to the effect that their certificates are verified and found correct and genuine.
9. They should join their post within 15 days of the issuance of this notification. In case of failure to join the post within 15 days, their appointment will expire automatically and no subsequent appeal shall be entertained.
10. Health and Age certificate should be produced from the Medical Superintendent concerned before taking over charge.
11. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
12. Their services shall be terminated at any time, in case his performance is found unsatisfactory during the contract period.
13. The appointment is made on school based. They will have to serve at the place of posting, and their services are not transferable to any other station.

SSTs (Male) Karak

14. Before handing over charge, once again their documents may be checked by the Headmaster/Principal (Concerned) and if they do not acquired the relevant qualifications as per rules, they may not be handed over the charge of the post.
15. The appointees shall take nine (09) months mandatory training at RITE Or PITE.

(Hafiz Dr. Muhammad Ibrahim)

**Director**

Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

Endst: No 1543-48

/ File No.5/A-14/SST/Adhoc Apptt: (BPS-16) Dated Peshawar the 13/5/2020

Copy forwarded for information and necessary action to the: -

1. Accountant General Khyber Pakhtunkhwa Peshawar
2. District Education Officer (M) Karak
3. District Accounts Officer Karak with the request to release their pay on production of duty Certificate duly countersigned by DEO concerned
4. Officials Concerned
5. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department
6. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar
7. M/File

*Revale lated*

*1/7/2020*  
Deputy Director  
(Establishment) E&SE  
Khyber Pakhtunkhwa Peshawar

*[Signature]*  
Deputy Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa

*[Signature]*



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

**CORRIGENDUM.**

Please read the School Name in respect of the following SSTs as mentioned against each, in the Appointment Order of District Karak, issued by this office vide No. 1543-48 dated 13-05-2020.

S.No	Name	Present Station	To be read as
1	Shakeel Ahmad	GHS Totaki	GCMHS Chokara
2	Ijaz Ahmad	GCMHS Chokara	GHS Totaki

The terms and conditions in the aforementioned Appointment Order will remain intact.

**DIRECTOR**

Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar

Endst: No. 1754-57 /F.No. Corrigendum/SST(M)/Karak. Dated Peshawar the 16/6/2020

Copy of the above is to the:-

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

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



# Complaint History

**KP250820-87191110**

2020-08-25 19:39:33

**STATUS**

**Closed - Relief cannot be granted**

## Complaint History

2020

SEPT 3  
2020



FROM  
DO Education (M), Karak

STATUS

**Closed - Relief cannot be granted**

REMARKS

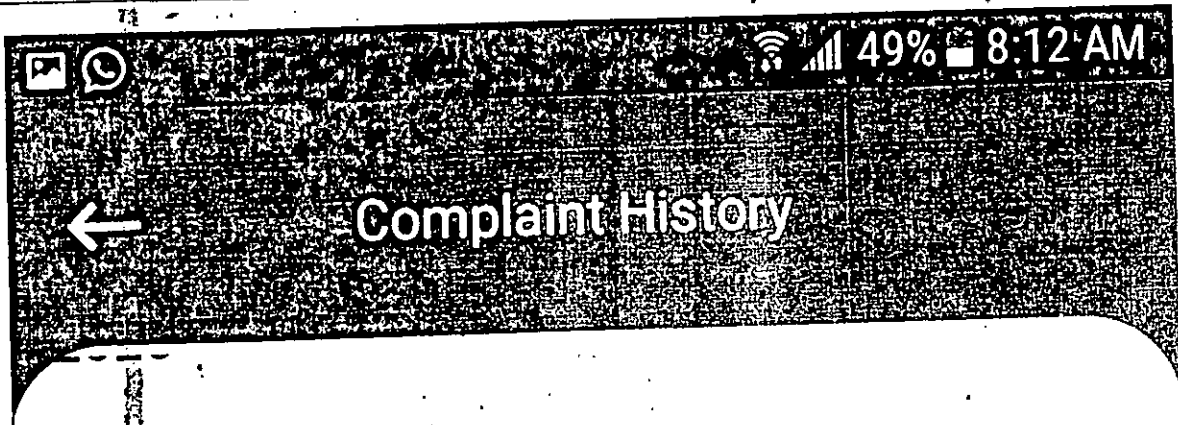
تبصرہ

Dear complainant, you are listed on  
disable quota. Thank you.

AUG 26



FEEDBACK



SEPT 29  
2020



FROM  
DO Education (M), Karak

STATUS

**Closed - Relief cannot be granted**

REMARKS

تبصرہ

Dear complainant, he has disability certificate. You are requested to show little restraint and wait little to make you adjusted at nearest station soon. Please co-operate DEO Male Karak in the larger interest of public. This Office will remain thankful always.. Thank You

SEPT 16  
2020



FROM  
Secretary, Elementary &  
Secondary Education

STATUS

**Forwarded**



**FEEDBACK**



49% 8:13 AM



## Complaint History

ZUZU

SEPT 29  
2020



FROM  
DO Education (M), Karak

STATUS

Closed - Partial relief  
granted

### REMARKS

تبصرہ

Dear complainant, He has disability certificate. He is adjusted at nearest station on the basis of his disability certificate. You are requested to show little restraint in the larger interest of public. And will be adjusted at nearest home station soon In sha Allah. Thank You

SEPT 16  
2020



FROM  
Secretary, Elementary &  
Secondary Education

STATUS

Forwarded



FEEDBACK

**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KARAK.**

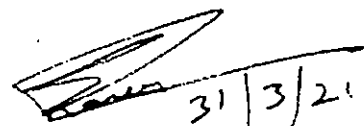
**REVISED PAY RELEASED ORDER:-**

Consequent upon notification by the worthy Director Elementary & Education Kh Dated Peshawa 11/09/2020, No. 3324-80/PA/03/DE&SE dated Peshawar the 23.10.2020 and No. 6297/F.No. 35/SST(M) Gen Cases dated Peshawar the 23.12.2020


The competent authority is pleased to release the pay & allowances conditionally of the following appointed SST General on the basis of his duty performance certificate provided by the Headmaster/Principal and countersigned by the DEO(M) Karak w.e.f the date of his taking over charge.

If the documents of anyone declared bogus, he will be reported to law enforcing agencies for necessary action and his appointment will stand withdrawn with immediate effect.

S.No	Name of Officer	Father Name	Name of School	Appointment Order No & Date
1	Rizwan Ullah	Gul Sah Khan	GHS, Dabb	1943-48/File No 5/A 4/SST/Adhoc Appnt/SPS 18 Dated Pesh the 13.05.2020
2	Mustafa Khurshid Alam	Mehmood Alam	GHS, Sarai Killa	Do

  
 31/3/21  
 DISTRICT EDUCATION OFFICER  
 (MALE) KARAK

No. 361-64 / Revised P. Order No. 237  
 Dated Karak the 31 / 3 / 2021  
 To the:-  
 Director Elementary & Education Peshawar  
 Accounts Officer Karak  
 Principal/Head Master Concerned  
 Accounts Officer Local Office

DISTRICT EDUCATION OFFICER  
 (MALE) KARAK  


**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KARAK**  
**REVISED PAY RELEASE ORDER:**

Consequent upon notification by the worthy Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar vide No.92637-706/PA/03/DE&SE Dated Peshawar the 11/09/2020, No. 3324-80/PA/03/D&SE Dated Peshawar the 23/10/2020 and No. 6297/F.No.35/SST(M) General Cases Dated Peshawar the 23/12/2020.

The competent authority is pleased to release the pay & allowances conditionally of the following newly appointed Qari on the basis of their duty performance certificates provided by the Head Master/Principal and countersigned by DEO (Male) Karak w.e.f the date of their taking over charge.

If the documents of anyone declared bogus, he will be reported to law enforcing agencies for necessary action and his appointment will stand withdrawn with immediate.

S.No	Name of Official	Father Name	Name of School	Appointment Order No. & Date
1	Qaiser Iqbal	Mashal Nawaz	GHS Esak Khumari	1555-62/Apptt:Qari/Estb:Secy: Dated Karak the 08/05/2020
2	Muhammad Noman Khan	Ajmal Khan	GHS Kando Khel	-----do-----
3	Ashmat Ali Khan	Wahib Gul	GHS Darish Khel	-----do-----
4	Arif Ullah	Gul Abbas Khan	GHS Jatta Ismail Khel	-----do-----
5	Fida Ur Rehman	Saif Ur Rehman	GHS Wargha Banda	-----do-----

**DISTRICT EDUCATION OFFICER**  
**(MALE) KARAK**

Endst: No. 377-90 /Revise.P.Release./Qari

Dated Karak The 27/01/2021

Copy to the:

1. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Accounts Officer Karak
3. Principals/Head Masters Concerned.
4. Budget & Accounts Officer Local Office

  
27/1/21  
**DISTRICT EDUCATION OFFICER**  
**(MALE) KARAK**



Directorate of Elementary & Secondary Education

Khyber Pakhtunkhwa, Peshawar

No. 15 No. 490/Vol-5/SST(M)/Complaints Karak

Dated Peshawar the 11/10 /2021

To

The District Education Officer,  
(Male) Karak

Subject: - COMPLAINT ON PAKISTAN CITIZEN PORTAL

Memo:

I am directed to refer to the subject cited above and to enclose herewith a complaint bearing No.KP010621-88454483 (AB) with the remarks to resolve the issue under existing rules/Law/Policy, on the analogy of other candidates and avoid discrimination with the appellant please.

Assistant Director (Estab)

Elementary & Secondary Education

Khyber Pakhtunkhwa

Endst: No. 3415

Copy of the above is to:-

1. PA to Director (E&SE) Local Directorate.

Assistant Director (Estab)

Elementary & Secondary Education

Khyber Pakhtunkhwa



## Complaint History

AUG 27  
2021



FROM  
Addl. Director Establishment

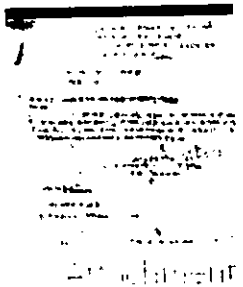
STATUS

**Forwarded**



TO  
DO Education (M), Karak

### ATTACHMENTS



### REMARKS

تبصرہ

Respected DEC, instant complaint is submitted at your office vide attached letter in which you were directed to issue pay release order accordingly in respect of Mr. Shakeel Ahmad NST. It further directed that submit compliance report at this office. Regards

AUG 26  
2021



FROM  
Directorate of Elementary &  
Secondary Education

**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR.**

Service Appeal No: 15605/2020

**Shakeel Ahmad SST BPS-16 GHS Totaki District Karak .....Appellant.**

**VERSUS**

District Education Officer (Male) Karak & others.....Respondents

**JOINT PARAWISE COMMENTS FOR & ON 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 Tribunal.
- 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 instant Service Appeal is against the prevailing law & rules.
- 7 That the Appellant has been treated as per law, rules & policy.
- 8 That the appeal is not maintainable in its present form.
- 9 That the appeal is bad for mis-joinder & non-joinder of the necessary parties.
- 10 That the instant Service Appeal is barred by law.
- 11 That the Transfer & Posting is the discretionary power of the competent authority in view of the judgment 2008, SCMR Page-531.
- 12 That the competent authority has got jurisdiction and competency to transfer & post a Regular Civil Servant under Section-10 of Civil Servants Act 1973 anywhere in the Province wherever his Service against the SST/ B-16 post are required.
- 13 That the appellant wants to stick to the post & station of his choice in the Respondent Department.

**ON FACTS**

- 1 That Para-1, needs no comments being pertains to the service record of the appellant against the SST B-16 post vide Notification dated 13-05-2020.
- 2 That Para-2 is incorrect & misleading on the grounds that the appellant is liable to serve the Respondent Department for the salary & others services benefits he is drawing from the E&SE Department.
- 3 That Para-3 is incorrect that the post of the appellant is a provincial Cadre post instead of U/C based post & liable to serve anywhere in the province as and when his services are required by the competent authority under the above cited provision of Law.
- 4 That Para-4 is also incorrect & denied, hence, needs no further comments, ~~is~~ detail reply to this para has been given in para-3 of the present reply by the Respondent Department.
- 5 That Para-5 is incorrect & misleading. The appellant has field a Departmental appeal dated 28-05-2020 to the Respondent No.1 which was forwarded to the Respondent No.2, *who vide corrigendum order No.4754-57/F.No/Corrigendum/SST(Male)/Karak dated 16-06-2020 with the remarks that the present place of posting of the appellant at GHS Totaki District Karak may be read as GCMHS Chokara with the remarks that the terms & condition of the Notification No.1543-48 dated 13-05-2020 will remain intact.* (Copies of the Departmental appeal & Corrigendum order dated 16-06-2020 are Annexure A & B).
- 6 That Para-6 is also incorrect & denied. Hence the appeal in hand is liable to be dismissed on the following grounds inter alia:-

**GROUND**

- A. **Incorrect & not admitted.** The appellant has been treated as per Law, Rules & Policy in the instant case by the Respondent Department. Hence, the claim of the appellant is baseless & liable to be rejected being an employee of provincial Cadre against the SST B-16 post in the Respondent Department.
- B. **Incorrect & not admitted.** On the grounds that the plea regarding the adjustment of the appellant in his own union council against the SST B-16 is illegal & even against the policy being an employee of provincial cadre teaching cadre, whereas, adjustment in union council is made against the PST (M & F) posts only instead of the SST B-16 post as claimed by the appellant.
- C. **Incorrect & not admitted.** Each & every Civil Servant, is legally bound to perform his official duty with due devotion & spirit for the salaries & other allied Service benefits he is drawing from the Govt: treasury & the same cannot accrue any vested right to stick to a post & station of his choice in the Respondent Department.

D. **Incorrect & not admitted.** The stand of the appellant is without any proof & justification. Hence, deserves to be rejected in view of the above made submissions. However, the Respondents further seek leave of this Honorable Tribunal to submit additional grounds & case law/record at the time of arguments.

**In view of the above made submissions, it is requested that this Tribunal may very graciously be pleased to dismiss the instant service appeal with cost in favor of the Respondent Department.**


Dated \_\_\_/\_\_\_/2021.

  
DIRECTOR

E&SE Department Khyber  
Pakhtunkhwa, Peshawar.  
(Respondents No: 1 & 2)

**AFFIDAVIT**

**I, Dr. Hayat Khan Asstt: Director (Litigation-II) E&SE** Department do hereby solemnly affirm and declare On oath that the contents of the instant Parawise Comments are true & correct to the best of my knowledge & belief.

  
Deponent

**BEFORE THE HONORABLE KHYBER PAKHATUNKHWA SERVICE TRIBUNAL  
PESHAWAR.**

**Service Appeal No: 15605/2020**

**Shakeel Ahmad SST BPS-16 GHS Totaki District Karak.....Applicant**

**VERSUS**

**District Education Officer (Male) Karak & others.....Respondents**

**APPLICATION FOR SUBMISSION OF CORRIGENDUM ORDER DATED 16-06-2020 & ON BEHALF OF  
RESPONDENTS NO: 1-2.**

**Respectfully Sheweth :-**

The Respondents submit as under:-

1. That the titled case is pending for reply before this Honorable Tribunal, wherein, the appellant is seeking for his adjustment against the SST B-16 post at GCMHS Chokara instead of GHS Totki District Karak as evident from the prayer of the appellant in the titled case.
2. That vide corrigendum order No.4754-57/F.No/corrigendum/SST (M)/Karak dated 16-06-2020 of the Respondent No.2, the appellant has been adjusted at GCMHS Chokara District Karak. Copy of the Order is attached.

**Therefore, in view of the above made submissions, it is requested that this Tribunal may very graciously be pleased to dismiss the instant appeal as the needful has been done by the Respondent No.2 as per prayer of the appellant by posting him at GCMHS Chokara District Karak against the SST B-16 post in the interest of justice please.**


**Dated \_\_\_/\_\_\_/2021.**



**DIRECTOR**  
E&SE Department Khyber  
Pakhtunkhwa, Peshawar.  
(Respondents No: 1 & 2)

**AFFIDAVIT**

**I, Dr. Hayat Khan Asstt: Director (Litigation-II) E&SE Department do hereby solemnly affirm and declare On oath that the contents of the instant application are true & correct to the best of my knowledge & belief.**

  
Deponent

Amir (B)

5A

To The DEO District Education Officer (MALE) Karak

Subject REQUEST FOR APPOINTMENT WITHIN THE TEHSIL AS PER ROLED

Dear sir,

It is hereby brought to your kind notice , that in the recent appointment list against the post of SST BPS-16 notified on 2019. I was on the top of list against the merit. As per prevailing rules and regulation as well as per merit the top selected are to be appointed in their respective union. There are four vacant posts of SST Maths, Physics in our district (KARAK) respectively. Two posts were lying vacant in Tehsil Takhti-E-Nasrati. One of the two post of our Tehsil was lying vacant in my respective Union i.e Chokara which is 1 KM away from my hometown.

Unfortunately setting aside on the rules and regulation a nominee laying at serial No 4 in the merit list has been appointed in my own union council, which is against the prevailing rules and regulation and I being on the top has been given the post in another Tehsil i.e **B.D SHAH**. Such kind of injustice from your good office as worth astounding.

Therefore your favour is very earnestly requested that the anomaly may kindly please be rectified and I may please be posted it my own Union Council. i.e Chokara.

I shall be highly obliged and shall pray for your long life and prosperity.

Thanks

Date: 28/05/2020  
Shakeel

Your's Obediently

Shakeel

Ahmed

Adress: Village Awazi Banda  
P/O Bogara Tehsil Takht-E-Nasrati Disst Karak.

Cell No: 03475127121

1. Copy to DEO (MALE) Karak.
2. Copy to Director of Elementary & Secondary Education KPK Peshawar.
3. Copy to Sectary of Elementary & Secondary Education KPK Peshawar.



AW 18 11 (76) B

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

**CORRIGENDUM.**

Please read the School Name in respect of the following SSTs as mentioned against each, in the Appointment Order of District Karak, issued by this office vide No. 1543-48 dated 13-05-2020.

S.No	Name	Present Station	To be read as
1	Shakeel Ahmad	GHS Totaki	GCMHS Chokara ✓
2	Ijaz Ahmad	GCMHS Chokara	GHS Totaki

The terms and conditions in the aforementioned Appointment Order will remain intact.

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

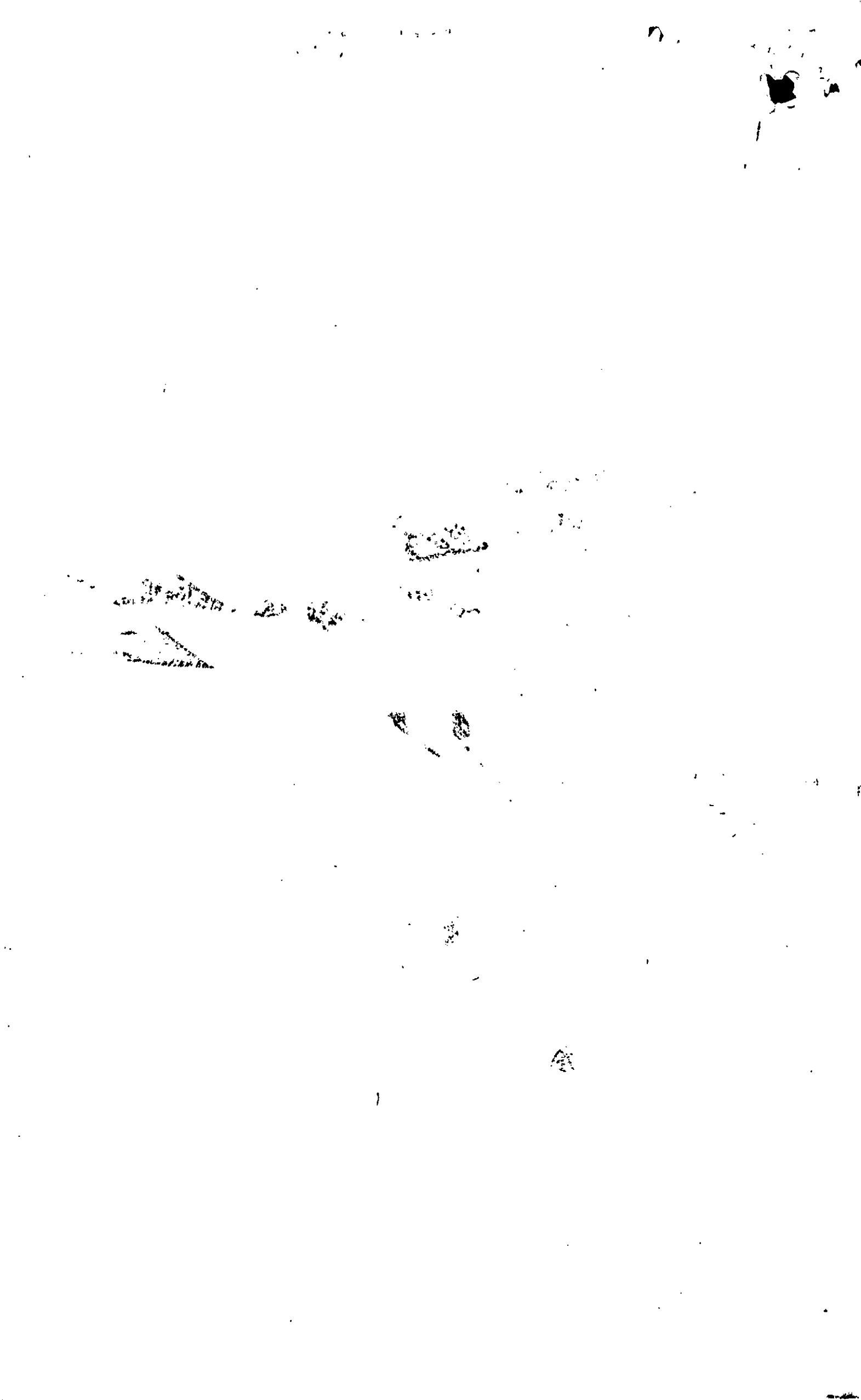
Endst: No. 4754-57 /F.No. Corrigendum/SST(M)/Karak. Dated Peshawar the 16/6 2020

Copy of the above is to the:-

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

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





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

In S.A # 15605/2020

Mr. Shakil Ahmed

Versus

District Education Officer (Male) Karrak & Others

**REJOINDER ON BEHALF OF**  
**APPELLANT**

**Respectfully Sheweth,**

All the Preliminary objection raised by the Respondents are incorrect and baseless and not in accordance with law and rules rather the Respondents are stopped due to their own conduct to raised any objection at the stage on the appeal.

**Facts**

All the facts of the appeal are correct while reply of the Respondent Department is incorrect vide abinitio and illegal, because all the top candidate mentioned in the appointment order has been transferred/ posted on their respectable union

council while the appellant has been posted as another union council which is 65 Kilometer away from the union council of the appellant. So the respondent department committed discrimination.

The malafidely of the department has also been shown from the very said act that other candidate who has been appointed with the appellant the salary has been granted to that very candidate from the date take over the charge of the post, while the appellant has been appointed on 13.05.2020 and take over the charged on 15.03.2020, while the salary of the appellant has been released on 06.08.2020. (Copies of appointment order & order regarding salary of other candidate are attached).

**ON GROUNDS:-**

All the grounds of the appeal are correct and accordance with law and prevailing rules and that of the Respondents are incorrect baseless and not in accordance with law and rules hence denied, because in response of the department appeal of the appellant the respondent department issued a corrigendum on 16.06.2020 in favour of the appellant but

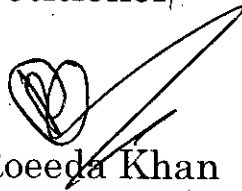
dispite that the appellat has not been treated according to that order.

*It is, therefore, requested that the appeal may kindly be accepted as prayed for and the appellat may kindly be treated according to the corrigendum order and may kindly be transferred to his own union council e.i Chowkara.*

Dated 30/08/2021

Petitioner,

Through



Roeda Khan

Advocate, High Court

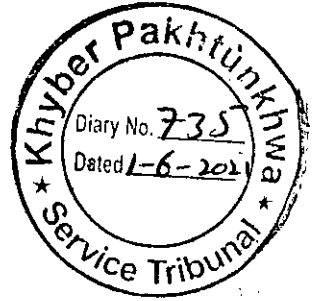
Peshawar.

DBU

**BEFORE THE HON'BLE SERVICE TRIBUNAL,**  
**KHYBER PAKHTUNKHWA PESHAWAR**

In Re C.M # \_\_\_\_\_/2021

In S.A # 15605/2020



Put up to the Hon'ble Chairman  
with relevant appeal.

Shakeel Ahmad

Order:  
02/06/2021

Received

16/2021

Versus

Place on file.  
Request is regretted.

Education Department

**APPLICATION FOR EARLY HEARING**

Respectfully Sheweth,

1. That the caption Service Appeal No.15605/20 has been pending before this Hon'ble Service Tribunal & fixed for hearing on 17/08.2021.
2. That if the captioned case has not been fixed for an early date, the Appellant will suffer irreparable loss.
3. That in the given circumstances early fixation of the instant case is indispensable for the appellant.
4. That there is no legal bar for acceptance of the instant appeal.

*It is, therefore, most humbly prayed that on acceptance of the instant application, the instant appeal No.15605/20 may very graciously be fixed for an early hearing in the best interest of justice as convenient to this Hon'ble Tribunal.*



Petitioner

Through 

**Roeeda Khan**

Advocate, High Court

Peshawar.

Dated: 01/06/2021

**BEFORE THE HON'BLE SERVICE TRIBUNAL, KHYBER  
PAKHTUNKHWA PESHAWAR**

In Re C.M # \_\_\_\_\_/2021

In S.A # 15605/2020

Shakeel Ahmad

**Versus**

Education Department


**AFFIDAVIT**

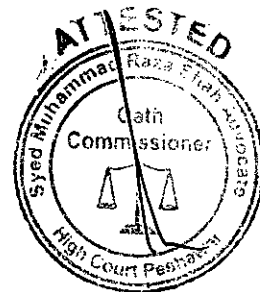
I, Shakeel Ahmad ASST (BPS-16) at GHS Totaki District Karak, do hereby solemnly affirm and declare on oath that the contents of this **application** are true and correct to the best my knowledge and belief and nothing has been concealed from this honorable Tribunal.



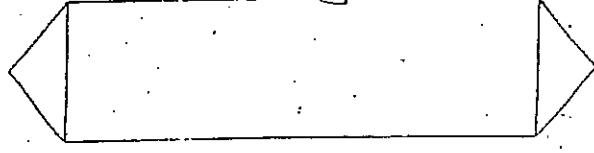
**Deponent**

Identified By:-

  
Roeeza Khan  
Advocate High Court  
Pakistan



بعدالت حیدر علی خان



مورثہ  
مقدمہ  
دعویٰ  
جرم

2021ء منجانب

بنام  
صاحب احمد

### بابت تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے بیرونی وجوہات کی دلیل کاروائی متعلقہ

آن مقام کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی اصل کاروائی کا کمال اختیار ہوگا۔ نیز  
وکیل صاحب کو راضی نامہ کرنے و تقریر ثالث و فیصلہ پر حلف دینے جو اب وہی اور اقبال دعویٰ اور  
بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق  
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم بیرونی یا ڈگری کی طرف یا اپیل کی برآمدگی  
اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و بیرونی کرنے کا مختار ہوگا۔ از بصورت ضرورت  
مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے  
تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے  
اور اس کا ساختہ پر داخستہ منظور قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جائد التوائے مقدمہ کے  
سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں  
گے۔ کہ بیرونی مذکور کریں۔ لہذا ذرا کالت نامہ لکھ دیا کہ سند ہے۔

2021ء

ماہ

الرقوم

کے لئے منظور ہے۔

مقام