


FORM OF ORDER SHEET

Court of _____

Case No. - 2005/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	27/12/2022	<p>The appeal of Mr. Muhammad Uzair Ali presented today by Mr. Noor Muhammad Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Notices be issued to appellant and his counsel for the date fixed.</p> <p style="text-align: right;">By the order of Chairman  REGISTRAR <i>ev</i></p>

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

SERVICE APPEAL No. 2005 /2022

MUHAMMAD UZAIR ALI

VS

EDUCTAION DEPTT:

INDEX

S.NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of appeal with Affidavit	1-6
2.	Application for suspension	7
3.	Copy of Notification dated 22.10.1995	A	8-9
4.	Copy of the notification dated 04/05/2009	B	10-12
5.	Copies of Notifications	B/1	13-16
6.	Copy of Notification 21.06.2011	C	17-18
7.	Copies of the Application dated 20.07.2011 and Notification dated 31.10.2011	D & D/1	19-20
8.	Copy of the Notification dated 28.12.2012	E	21
9.	Copies of Letter Dated 11-09-2013 & Posting Notification Dated 30-09-2013	F & G	22-23
10.	Copy of Letter Dated 02-12-2013	H	24-25
11.	Copy of Notification dated 08-05-2012 & Seniority List	I	26-27
12.	Copies of appeals	J	28-36
13.	Copies of the letters	K	37-40
14.	Copy of the tentative seniority list dated 21.10.2021	L	41-42
15.	Copies of the Appeals	M	43-45
16.	Copies of letter dated 11-03-2022 & seniority list	N	46-48
17.	Copies of Letters	O & P	49-50
18.	Copy of the Corrigendum	P/1	51-52
19.	Copies of the inter se Merit of Male DOs BPS-18 (Renamed as DDEOs) and inter-se-merit of male DDEOs BPS-17 (Renamed as SDEOs), seniority list of DDEOs BS-18, seniority list of SDEOs BS-17	Q, R, S & T	53-68
20.	Copy of the Departmental Appeal	U	69-72
21.	Vakalatnama		73

Through:

APPELLANT

**NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT**

-1-

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 2005 /2022

Mr. Muhammad Uzair Ali, Management Cadre Officer (BPS-19),
Posted as District Education Officer (M), District Khyber.

..... APPELLANT

VERSUS

- 1- The Government of Khyber Pakhtunkhwa through Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
- 2- The Secretary Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The Secretary Establishment Department, Khyber Pakhtunkhwa, Peshawar.
- 4- The Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 5- The Secretary Khyber Pakhtunkhwa Public Service Commission.
- 6- Mr. Jafar Mansoor Abbasi, (DEO BS-19) presently at the Disposal of the Directorate of E&SE, Khyber Pakhtunkhwa, Peshawar.
- 7- Mst. Samina Altaf, DEO (F) (BPS-19), presently posted as Chairperson Board of Intermediate & Secondary Education, Kohat.

..... RESPONDENTS

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED FINAL SENIORITY LIST DATED 12.10.2021 ISSUED ON 31.03.2022 WHEREBY THE JUNIOR COLLEAGUES OF THE APPELLANT HAVE BEEN PLACED/SHOWN SENIOR TO THE APPELLANT AND AGAINST THE INACTION OF THE RESPONDENT BY NOT DECIDING THE DEPARTMENTAL APPEAL OF APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS.

PRAYER:

That on acceptance of this appeal the impugned final seniority list dated 12.10.2021 issued on 31.03.2022 may kindly be modified/rectified to the extent of the appellant and private respondents and the appellant may kindly be placed at right position in the impugned seniority list as per Rule 17(1)(a) of the Appointment, Promotion and Transfer Rules, 1989 i.e. be placed senior to the private respondents in the impugned seniority list. Any other remedy which this August Tribunal deems fit, may also be awarded in favor of the appellant.

appellant was allowed to rejoin the services as District Education Officer (Male) BPS-19 in the Management Cadre (MC) where after the appellant was posted as District Education officer (Male) BPS-19 at District Nowshera. Copies of Letter Dated 11-09-2013 & Posting Notification Dated 30-09-2013 are attached as annexure **F & G.**

- 8. That the Khyber Pakhtunkhwa Public Service Commission sent the inter-se-merit of EDOs/DEOs to the E&SE Department in 2013 for the purpose of inter-se-seniority vide letter Dated:02/12/2013 in which the appellant stands at S.No.16 of the ibid inter-se Merit of the EDOs/DEOs for the purpose of seniority. Copy of Letter Dated 02-12-2013 of Inter-se-Merit is attached as annexure **H.**
- 9. That the respondent Department through Notification Dated 08-05-2012 issued Seniority List of EDOs whereby the name of the appellant was not shown/mentioned due to lien (for joining) in Higher Education Department but the respondents are bound by law to place/retain the name of the appellant in the ibid seniority list in a static position. Copy of Notification dated 08-05-2012 & Seniority List are Attached as Annexure **I.**
- 10. That since 2012 the final seniority of the DEOs/EDOs was not issued and similarly the name of the Appellant was not included in the seniority of EDOs (BPS-19). The appellant made several appeals to the Respondent Department as well as to the Hon; Chief Secretary through the Director E&SE KP for including his name in the seniority list, however, all the efforts proved futile and his appeals were kept pending for one or other reason. Copies of appeals are attached as Annexure **J.**
- 11. That letters were addressed to the Director Elementary & Secondary Education for issuance of the final seniority list of the DEOs (BPS-19) of the E&SE Department. Copies of the letters are attached as annexure **K.**
- 12. That finally the respondents issued the tentative seniority list of DEOs BPS-19 and enlisted the name of the Appellant in the tentative seniority list issued on 21-10-2021, however, the issued tentative seniority of DEOs MC Group was not in accordance with the inter-se-merit of the KPPSC and had been issued in utter violation of the seniority rules as provided in APT Rules 1989. Copy of the tentative seniority list dated 21.10.2021 is attached as Annexure **L.**
- 13. That in the inter-se-merit of the KPPSC issued on 02-12-2013, the seniority number of the Appellant is 16. The officers from S.No.1-7, from S.No.9 - 11 & 13, 14 have been retired from service. The officers at S.No.8 (Muhammad Ibrahim) & S.No.15 (Gohar Ali Khan) have been promoted to BS-20. After the retirement of twelve (12) senior most DEOs in the inter-se-merit and of two promotions, the seniority number of the petitioner should have been placed at S.No.02 after Mr. Abdul Rasit who stands at S.No. 12 in the inter-

seniority rules. However, in the tentative seniority list the Appellant has been placed at seniority No.08 in blatant violation of the established seniority rules in vogue. That feeling aggrieved from the tentative seniority list, the Appellant preferred appeals to the Respondent Department against the tentative seniority list for correction and placing the name of the appellant at a proper serial. Copies of the Appeals are attached as Annexure M.

14. That the Respondent Department through Letter Dated 11-03-2022 issued the final impugned seniority list dated 12-10-2021 of the additional Directors/District Education Officers BPS-19 Male (Management Cadre) whereby the name of the appellant was illegally placed at serial No.05 in ibid impugned seniority list and in utter violation of the inter-se-merit of the Khyber Pakhtunkhwa Public Service Commission but according to the inter se merit of Khyber Pakhtunkhwa public service commission the name of the appellant must be placed at serial No.02 of the impugned seniority list. Copies of letter dated 11-03-2022 & seniority list are attached as Annexure N.

15. That through the impugned final seniority list the respondent Department without any lawful authority by ignoring and violating all the existing rules and directions of the Administrative Department issued to the Directorate of E&SE vide dated 05-07-2018 and letter dated 18-07-2018 wherein it has been clearly noted that no administrative Authority/power can change the inter-se-merit of the Public Service Commission, astonishingly, issued the impugned seniority of the appellant against the inter se merit issued by the KP Public Service Commission. Copies of Letters are attached as Annexure O & P.

16. That it is pertinent to mention here that subsequent to the advertisement mentioned in Para-3 a corrigendum had been floated in Daily "Mashriq" on 21.6.2009 whereby 60 % of the advertised posts were then allocated for the candidates from among the **Teaching Cadre** and 40 % for the candidates of the **Open Market** in respect of EDOs, DOs and DDOs as per requisition of the Department. Copy of the Corrigendum is attached as Annexure..... P/1

17. That like the selection of the DEOs BS-19, the District Officers BS-18 (now designated as Deputy District Education Officers BS-18) and DDEOs BS-17 (now designated as Sub Division Education Officers BS-17) were also selected by the KPPSC and appointed on initial basis vide the same advertisement i.e. Advt. No.05 on the ratio of 60% Teaching Quota and 40% Open Market Quota but the inter-se-seniorities of DDEOs BS-18 (Now promoted as DEOs BS-19) and that of the SDEOs BS-17 (Now promoted as DDEOs BS-18) were made in accordance with the inter-se-merit of the Khyber Pakhtunkhwa Public Service Commission. Copies of the inter se Merit of Male DOs BPS-18 (Renamed as DDEOs) and inter-se-merit of male DDEOs BPS-17 (Renamed as SDEOs), seniority list of

-5-

DDEOs BS-18, seniority list of SDEOs BS-17 are also attached as Annexure **Q, R, S & T.**

- 18.** That feeling aggrieved from the impugned final seniority list the appellant preferred Departmental Appeal to the respondents Department but the same was not responded till date. Copy of the Departmental Appeal is attached as Annexure **U.**
- 19.** That the appellant feeling aggrieved and having no other remedy filed the instant service appeal on following grounds inter alia.

GROUND:

- A.** That the impugned final seniority lists are against the spirit of the service law particularly Section 8 the Khyber Pakhtunkhwa Civil Servant Act, 1973 read with enabling law and rules hence the same are/ is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside and the appellant be enlisted in the final seniority at a proper place i.e. serial No.2.
- B.** That appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents have violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C.** That the treatment meted out to the appellant is clearly based on discrimination and malafide and as such the respondents have violated the principle of natural justice.
- D.** That in light of rule 17(1) (a) of the Appointment, Promotion and Transfer Rules, 1989 the appellant has the legitimate right to be placed above the respondents in the impugned seniority list dated 12/10/2021.
- E.** That the respondent department has acted arbitrarily and malafidely by issuing the impugned seniority list.
- F.** That the respondents violated Article 38(e) of the Constitution of Islamic Republic of Pakistan 1973, according to which state is bound to eliminate disparity in the income and earning of individuals including persons in the services of the Federation.
- G.** That appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is, therefore, most humbly prayed that the appeal of the appellant may very graciously be accepted as prayed for, please.

Dated:

APPELLANT




MUHAMMAD UZAIR ALI

THROUGH:




**NOOR MUHAMMAD KHATTAK
ADVOCATE SUPREME COURT**


WALEED ADNAN


UMAR FAROOQ MOMAND


MUHAMMAD AYUB


**KHANZAD GUL
ADVOCATES**

AFFIDAVIT

I, Muhammad Uzair Ali, Management Cadre Officer (BPS-19), Posted as District Education Officer (M), District Khyber do hereby solemnly affirm and declare on Oath that the contents of this Service Appeal are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Court.



DEPONENT

-7-

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

CM No. _____/2022

IN

SERVICE APPEAL No. _____/2022

MUHAMMAD UZAIR ALI VS EDUCATION DEPTT:

**APPLICATION FOR RESTRAINING THE RESPONDENTS NOT
TO MAKE/ISSUE PROMOTION TO THE POST OF BPS-20 ON
THE BASIS OF IMPUGNED SENIORITY LIST DATED
31.03.2022.**

R/SHEWETH:

- 1- That the above-mentioned appeal along with this application has been filed before this August Service Tribunal in which no date has been fixed so far.
- 2- That appellant filed the above-mentioned service appeal against the impugned seniority list dated 31.03.2022 whereby his seniority has been placed at wrong position.
- 3- That all the three ingredients necessary for the stay is in favor of the applicant.
- 4- That the impugned seniority list dated 31.03.2022 had been issued by the respondents in utter disregard of law and prevailing Rules.

It is, therefore, most humbly prayed that on acceptance of this application the respondents may kindly be restrained from making/issuing promotion to the post of BPS-20 on the basis of impugned seniority list dated 31.03.2022 till the disposal of the instant service appeal.

Dated: .2022


APPLICANT

THROUGH: **MUHAMMAD UZAIR ALI**


**NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT**

"A" -8-

NOTIFICATION

No. SO (Colleges) II-1/93-V:- Consequent upon the recommendations of the N.F.F. Public Service Commission, The Governor, N. W. P. F., is pleased to appoint the following candidates as Officiating Lecturers (B.S.-17) in Political Science at the Govt. Colleges mentioned against each from the date of their taking over charge subject to the conditions mentioned below :-

Sr. No.	Name of candidates with father's name.	Place of posting.	Remarks.
1.	Mr. Muhammad Uzair Ali S/O Abdul Jayyum, Vill; & P.O. Tordher Abda, Tsa; Lashor District Swabi.	Offtg; Lecturer in Political Science, Govt. College, Ochi. (Manshara).	Against the vacant post.
2.	Mr. Gul Wali S/O Haji Muhammad, house No. T-817, Koonia Kakran, Mohi Nishtarpara, New Rampura Rate, Peshawar.	Offtg; Lecturer in Political Science, Government College, Lashar Nawaab (Manshara)	-do-
3.	Mr. Safi Ullah S/O Safi Ullah, Vill; & P.O. Sheikhan, Tehsil & District Peshawar.	Offtg; Lecturer in Political Science, Government College, Havelian.	-do-
4.	Mr. Amir Muhammad S/O Muzadar Khan, Vill; & P.O. Batkhela, Malakand Agency, G/O Madina Apto Store, Batkhela.	Offtg; Lecturer in Political Science, Government College, Mingora.	-do-
5.	Mr. Asif Ali S/O Shah Said, Mohallah Thaves Khail, Village Gami Tawal Zai, P.O. Gami Kapura (Mardan).	Offtg; Lecturer in Political Science, Government College, Bakhawali (Mardan).	-do-

Consequent upon the above appointments, the following posting/transfers are ordered in the public interest :-

S.No.	Name & Designation.	Transferred to.	Remarks.
1.	Mr. Siraj-ud-Din, Lecturer in History, Civics, Govt. College, Ochi (Manshara).	Govt. College, Nowshera.	Vice S.No. 1. above.
2.	Mr. Sajjad Baxad, Lecturer in History, Government College, Nowshera.	Government College, Deraul (Malakand).	Against the vacant post.

TERMS & CONDITIONS:

- The appointment of the candidates mentioned at para-1 above is subject to the condition that they are the domicile of N.F.F.
- Their inter-se-seniority will be fixed according to the order of merit assigned by the N.F.F. Public Service Commission.

(Contd)..... P/12

BETTER COPY: A-8

GOVERNMENT OF N.W.F.P
Dated Peshawar, the 22.10.1995

NOTIFICATION.

No.SO(College)II-1/93-V: Consequent upon the recommendations of the NWFP Public Service Commission. The Governor N.W.F.P is pleased to appoint the following candidates as officiating Lecturer (BPS-17) in Political Science at the Govt. College mentioned against each from the date of their taking over charge subject to the conditions mentioned below:-

S.NO	Name of Candidates with father name	Place of Posting	Remarks
1.	Mr. Muhammad Uzair Ali S/o Abdul Qayyum, Vill: & P.O Tordher Adda, Tehsil Lahore District Swabi	Offtg: Lecturer in Political Science, Govt; College Oghi, (Mansehra).	Against the vacant post
2	Mr. Gul wali S/o Haji Muhammad, House No. T-817, Koocha Kakran, Moh; Nisterpura, New Rampura Rate, Peshawar	Offtg: Lecturer in Political Science, Govt; College, Lissan Nawab (Mansehra).	-do-
3	Mr. Safi Ullah S/o Sami Ullah, Vill: & P.O Sheikhan tehsil & District Peshawar	Offtg: Lecturer in Political Science, Govt; College, Havelian	-do-
4	Mr. Amir Muhammad S/o Muqadar Khan, Vill; & P.O Batkhela, Malakand Agency, O/O Madina Auto Store, Batkhela.	Offtg: Lecturer in Political Science, Govt; College, Mingora	-do-
5.	Mr. Asif Ali S/o Shah Said, Mohallah Thawas Khail, Village Garhi Ismail Zai, P.O Garhi Kapura (Mardan)	Offtg: Lecturer in Political Science, Govt; College, Bikhsaali (Mardan)	-do-

2. Consequent upon the above appointments the following posting/transfer are ordered in the public interest:

S.No	Name & Designation	Transferred to.	Remarks
1.	Mr. Siraj-ud-Din, Lecturer in History/Civic, Govt; College, Oghi (Mansehra).	Govt; College Nowshera	Vice S.No.1, above
2	Mr. Sajjad Samad, Lecturer in History, Government College, Nowshera.	Government College Dargai (Malakand)	Against the vacant post.

TERMS & CONDITIONS:

1. The appointment of the candidates mentioned at Para 1 above is subject to the condition that they are the domicile of NWFP.
2. Their inter-se-minority will be fixed according to the order of writ assigned by the NWFP Public Service Commission.

3. Their services will be liable to termination on one month notice from either side. In case of resignation without their one month's pay/allowances, if any, shall be forfeited to Government.
4. No TA/DA etc; is allowed on their first appointment as Lecturer.
5. The candidates should join their post within 30 days of the issue of this notification. The Director of Education (Colleges) NWFP, Peshawar should furnish a certificate to the effect that the candidates have joined the post or otherwise after one month of the issue of this notification.
6. Charge reports in duplicate should be submitted to all concerned.
7. They will be governed by such rules and regulation as may be issued from time to time by the Government for the category of Government Servants to which they belong.
8. A declaration of assets should be obtained from them if not already done and kept on record.
9. Their appointment will be subject to the satisfactory report on the verification of their character and antecedents.

SECRETARY TO GOVT. OF NWFP,
EDUCATION DEPTT: PESHAWAR:

Endst: No. SO (Colleges) II-1/93-V, Dated Pesh; the 22-10-1995.

Copy for information and n/action to :-

1. The Director of Education (Colleges) NWFP, Peshawar w/r to his letter No. 23602 dated 16-10-1995. The original medical certificates of the above named candidates are attached.
2. The Accountant General, NWFP, Peshawar.
3. The District Accounts Officers concerned.
4. The Agency Accounts Officer, Malakand Agency.
5. The Principals of Govt; Colleges concerned.
6. The Secretary, NWFP Public Service Commission, Peshawar w/r to his letter No. 17804 dated 27-7-1995.
7. The Manager, Govt; Printing Press, NWFP, Peshawar.
8. The candidates concerned.
9. The officers concerned.

(FARKHANI IQBAL)
SECTION OFFICER (COLLEGES)

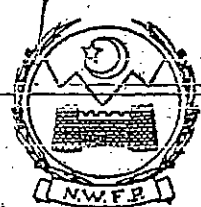
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3. Their service will be liable to termination on one month notice from either side. In case of resignation without notice their one month's pay/allowance if any, shall be forfeited by Government.
4. NOTA/DA etc; is allowed on their first appointment as Office Lecturer.
5. The candidates should join their post within 30 days of the issue of this notification. The Director of Education (College) NWFP, Peshawar should furnish a certificate to the effect the candidates have joined the post of otherwise after one month of the issue of this notification.
6. Charge reports in duplicate should be submitted to all candidates.
7. They will be governed by such rules and regulation as they issued from time to time by the Government Servants to which they belong.
8. A declaration of assets should be obtained from them, if no already done and kept on record.
9. Their appointment will be subject to the satisfactory report on the verification of their character and antecedents.

**SECRETARY TO GOVT; OF NWFP,
EDUCATION DEPTT: PESHAWAR**

Dated: 22.10.1995

Endst:No.SO(College)II-1/93-V



~~"A"~~ "B"
-10-

GOVERNMENT OF NWFP
ELEMENTARY & SECONDARY
EDUCATION DEPARTMENT
Dated Peshawar the 04-05-2009

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NOTIFICATION

No. SO(G)/E&SE/1-76/08/M&T: In pursuance of the provision contained in sub-rule (2) of rule 3 of the North-west Frontier Province Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, and in supersession of this Department's Notification No.SOG/S&LD/1-28/2003/Vol.II dated: 9-4-2009, the Elementary & Secondary Education Department, in consultation with the Establishment Department and the Finance Department, hereby lays down the method of recruitment, qualification and other conditions specified in column 3 to 5 of the Appendix to the Notification which will be applicable to the posts of Schools Management Cadre in the Elementary and Secondary Education Department, as specified in column 2 of the said Appendix.

APPENDIX

S.NO	NOMENCLATURE OF POST	MINIMUM QUALIFICATION FOR INITIAL RECRUITMENT/TRANSFER	AGE LIMIT	METHOD OF RECRUITMENT
1.	2.	3.	4.	5.
1.	Director (Elementary & Secondary) and Director (Curriculum & Teacher Education) COMBINED.			By selection on merit from amongst Executive District Officer and Additional Directors (COMBINED), with at least seventeen year service in BPS-17 and above or twelve years service in BPS-19, as the case may be.
2.	Executive District Officers/ Additional Director in the Schools (COMBINED)	i. PH.D in Education with at least seven years teaching/ administrative experience in Govt recognized educational institution /office; or ii. M.Phil in Education with at least nine years teaching /	35-50 years	By initial recruitment in the following manner: (a) Forty percent by initial recruitment from amongst open market; and (b) Sixty percent by initial recruitment from amongst the Teaching Cadre having the qualification as mentioned in Column No.3.

-11-

Annex A-1

A-3

		office.		(b) Sixty percent by initial recruitment from amongst the Teaching Cadre having the qualification as mentioned in Column No.3.
3.	Assistant District Officers	B.A/B.Sc in second division with B.Ed and five years teaching/administrative experience in Govt recognized education institution /office.	25-35 years	By initial recruitment

SCHOOLS MANAGEMENT CADRE (WOMEN'S SECTION)

1.	District Officers/Deputy Director/Deputy Director Teacher Education and Curriculum	i. PH.D in Education and two years teaching/ administrative experience in Govt recognized Education institution/office; or ii. M.Phil in Education and three years teaching /administrative experience in Govt recognized educational institution/office; or M.A/M.Sc in second Division with M.Ed/M.A (Education) / M.A (Education Planning and Management) or equivalent qualification with at least five years teaching /administrative experience in Govt recognized educational institution/office.	25-45 years	By initial recruitment in the following manner: (a) Forty percent by initial recruitment from amongst open market; and (b) Sixty percent by initial recruitment from amongst the Teaching Cadre having the qualification as mentioned in Column No.3.
2.	Deputy District Officers/Assistant Director.	M.A/M.Sc in second division with B.Ed and five years teaching /administrative experience in Govt recognized Educational institution/ office.	21-40 years	By initial recruitment in the following manner: (a) Forty percent by initial recruitment from amongst open market; and (b) Sixty percent by initial recruitment from amongst the Teaching Cadre having the qualification as mentioned in Column No.3.

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-12-

in Elementary & Secondary Education Department

Assistant District Officers	B.A/B.Sc in second division, with B.Ed and five years teaching/administrative experience in Govt recognized education institution /office.	21-35 years	By initial recruitment
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SECRETARY TO GOVERNMENT OF NWFP
ELEMENTARY & SECONDARY
EDUCATION DEPARTMENT.

Endst No: SO(G)/E&SE/1-76/08/M&T dated 04-05-2009

Copy is forwarded to:

1. All Administrative Secretaries to Government of NWFP.
2. Secretary to Governor, NWFP.
3. Secretary to Chief Minister, NWFP.
4. Chairman Public Service Commission, NWFP, Peshawar.
5. All Directors in Elementary & Secondary Education in NWFP.
6. All Executive District Officer E&S Education in NWFP.
7. Director Information with the request to give wide publicity.
8. The Manager, Govt. Printing Press Peshawar for publication in the next issue of Govt. Gazette.
9. PS to Minister for Elementary & Secondary Education NWFP, Peshawar.
10. PS to Secretary Elementary & Secondary Education NWFP, Peshawar.
11. PS to Additional Secretary E&S Education Department.
12. PA to Deputy Secretary E&S Education Department.
13. All Section Officer/Planning Officer, E&S Education Department, NWFP, Peshawar.


SECTION OFFICER (GENERAL)




GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

-13-

Dated Peshawar the February 24, 2011

"B11"

NOTIFICATION

NO. SO(S/M)E&SED/3-2/2011/EDOs/EMC (BS-19):

Consequent upon the recommendations of

Khyber Pakhtunkhwa public Service Commission Peshawar, the competent authority is pleased to appoint the following candidates against the post of Executive District Officers/Additional Directors (BS-19) (Rs.19680-970-39080) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, in the Management Cadre in Elementary & Secondary Education Department on the terms and conditions given below with immediate effect :-

S. #	NAME WITH FATHER'S NAME AND ADDRESS
1.	Ghulam Qasim Khan S/O Abdül Majeed Khan, R/O Gillani Town, Street No. 2 Distt: D.I. Khan.
2.	Abdul Malik S/O Muhammad Mushtaq, R/O Muhalla Jamundan Wala Distt: D.I. Khan.
3.	Umar Khan S/O Muhammad Hassan, R/O Faizullah Colony, Near Degree College Tank City.
4.	Shamas Khan S/O Mir Ahmad Khan, R/O Village Satkatur, Gadoon P/O Kabgani Tehsil & Distt: Swabi.
5.	Abdus Salam S/O Hameed Ullah Jan, R/O Village Mozam, Tehsil & Distt: D.I. Khan.
6.	Siraj Mohammed S/O Muhammad Khan, R/O Village Towda, P/O Wahid Garhi Charsadda Road Peshawar.
7.	Muhammad Uzair Ali S/O Abdul Qayyum, R/O Village Tordher, Muhalla Saini Adda, Tehsil Lahor Distt: Swabi.
8.	Nazir Khan S/O Gul Piao Khan, R/O Yaghi Ghulam Khel, Muhalla Ghazali Public School, Khojaki Qilla Tehsil Takhte Nasrati Distt: Karak.
9.	Sahibzada Harnid Mahmud S/O Mahmud-Ul-Hassan Akhtar, House No. 105/6-B, Nawaz Street Javed Town Gulbahar No. 4 Peshawar City.
10.	Bashir Hussain Shah S/O Taj Hussain Shah, Mohalla Malkan Wala Village Darvesh Tehsil & Distt: Haripur.
11.	Muhammad Rafique S/O Niaz Khamim, House No. 84/1/TCK Karak City P/O Karak Tehsil & Distt: Karak.
12.	Feroz Hussain Shah S/O Sultan Ali Shah, Village & P/O Wanda Khaliq Shah Tehsil & Distt: D.I. Khan.
13.	Abdur Rashid S/O Ghulam Ja'far, P/O Muryali, Chah Mughal Wala Tehsil & Distt: D.I. Khan.
14.	Muhammad Ibrahim S/O Buzarg Jamher, Village Damtal Tehsil Samarbagh Distt: Dir Lower.
15.	Sultan Mahmood Mian S/O Mumtaz, Village & P/O Deolia, Distt: Swat.
16.	Roz Wali Khan S/O Jannat Noor, Village & P/O Tatar Khel, Tehsil Takhte Nasrati Distt: Karak.
17.	Abdullah S/O Mir Azam, Village Jolagram, Muhalla Darvesh Khel, Tehsil Swat Ranezai Distt: Malakand Agy.
18.	Muhammad Riaz S/O Ghulam Khan, Village Sokar P/O Guli Bagh Tehsil & Distt: Mansehra.
19.	Jehan Muhammad S/O Sultar Muhammad, Mot alla Dagi Khel Village Rashakai Tehsil & Distt: Nowshera.
20.	Gohar Ali Khan S/O Muhammad Ali Khan, Village Tarkha Distt: Nowshera.
21.	Haziq-ur-Rahman S/O Sarwar Jan, Village Ganderi Khatuk, Tehsil & P/O Takhte Nasrati Distt: Karak.
22.	Zia-ud-Din S/O Ghulam Mohiy-ud-Din, Bamozai Street Meena Khel Distt: Lakki Marwat.
23.	Atta Ullah Khan S/O Muhammad Nawaz Khan, Mohalla Meena Khel Tehsil & Distt: Lakki Marwat.

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Consequent upon the above, the following postings/transfers are hereby ordered, henceforth.

S. #	NAME OF RECOMMENDEES	PLACE OF POSTING	REMARKS
1.	Ghulam Qasim Khan S/O Abdul Majeed Khan	EDO (E&SE) Tank	
2.	Abdul Malik S/O Muhammad Mushtaq	EDO (E&SE) Lakki Marwat.	
3.	Umar Khan S/O Muhammad Hassan	EDO (E&SE) Manshra.	
4.	Shamas Khan S/O Mir Ahmad Khan	EDO (E&SE) Buner.	
5.	Abdus Salam S/O Hameed Ullah Jan	EDO (E&SE) Swabi.	already occupied by him
6.	Siraj Muhammad S/O Muhammad Khan	EDO (E&SE) Chitral.	
7.	Muhammad Uzair Ali S/O Abdul Qayyum	EDO (E&SE) Mardan	
8.	Nazir Khan S/O Gul Piao Khan	EDO (E&SE) Kohat.	
9.	Sahibzada Hamid Mehmood S/O Mehmood-ul-Hassan Akhtar	EDO (E&SE) Abbottabad.	
10.	Bashir Hussain Shah S/O Taj Hussain Shah	Add. Director P&D, Directorate of E&SE	already occupied by him
11.	Muhammad Rafique S/O Niaz Khamim	Add. Director Establishment Directorate of E&SE.	
12.	Feroz Hussain Shah S/O Sultan Ali Shah	EDO (E&SE) D.I. Khan.	
13.	Abdur-Rashid S/O Ghulam Jaffar	EDO (E&SE) Banau.	
14.	Muhammad Ibrahim S/O Buzurg Jamher	EDO (E&SE) Dir Lower.	already occupied by him
15.	Sultan Mahmood Mian S/O Muntaz	EDO (E&SE) Swat.	
16.	Roz Wali Khan S/O Jannat Noor	EDO (E&SE) Nowshera.	already occupied by him
17.	Abdullah S/O Mir Azam	EDO (E&SE) Shangla.	
18.	Muhammad Riaz S/O Ghulam Khan	EDO (E&SE) Haripur.	
19.	Jehan Muhammad S/O Sultan Muhammad	EDO (E&SE) Hangu.	
20.	Gohar Ali Khan S/O Muhammad Ali Khan	EDO (E&SE) Peshawar.	
21.	Haziq-ur-Rahman S/O Sarwar Jan	EDO (E&SE) Karak.	
22.	Zia-ud-Din S/O Ghulam Mohiy-ud-Din	EDO (E&SE) Dir Upper	
23.	Atta Ullah Khan S/O Muhammad Nayaz Khan	EDO (E&SE) Charsadda.	

3. The services of the present incumbents of teaching cadre are placed at the disposal of Director, E&SE for further posting.

TERMS & CONDITIONS:

- 1- Their services will be considered regular but without Pension & Gratuity in terms of Section-19 of the NWFP Civil Servant Act, 1973 as amended vide NWFP Civil Servants (Amendment) Act, 2005. They will however be entitled to Contributory Provident Fund in such a manner and at such rates as prescribed by the Government.
- 2- The Officers who are already in Government Service and working against pensionable posts on regular basis before 1st day of July 2001, without any service break, on application to Khyber Pakhtunkhwa Public Service Commission through proper channel and selection by the Commission are appointed and allowed choice of option either to retain benefit of pension & gratuity as allowed to them under their previous terms of appointment or to avail the benefit of Contributory Provident Fund allowed to them under new appointment.

their services are liable to termination on one month's notice from either side. In case of resignation without notice, their one month's pay/allowances shall be forfeited to the Government.

-15-

The appointees should join their posts within 30-days of the issuance of this notification. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar would furnish a certificate to the effect that the candidates have joined the posts otherwise, after one month of the issuance of this Notification, failing which their candidature will expire automatically and no subsequent appeal etc shall be entertained.

They would be on probation for a period of one year extendable for another one year as provided in NWFP Appointment Promotion and Transfer Rules 1989.

They will be governed by such rules and regulations as may be issued from time to time by the Government.

Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they will be proceeded against under the NWFP Removal from Service (Special Powers) Ordinance, 2000 and the Rules framed from time to time.

Charge report should be submitted to all concerned.

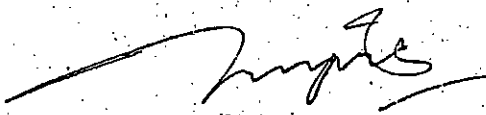
No TA/DA will be allowed to the appointees for joining their duty.

SECRETARY

ndst: of even number & date:

Copy forwarded to the:

1. PSO to Chief Minister, Khyber Pakhtunkhwa.
2. Accountant General, Khyber Pakhtunkhwa Peshawar.
3. Director, E&SE, Khyber Pakhtunkhwa, Peshawar.
4. District Accounts Officers concerned.
5. Executive District Officer E&SE concerned.
6. Director Recruitment, Khyber Pakhtunkhwa, Public Service Commission, Peshawar.
7. Manager Government Printing Press, Khyber Pakhtunkhwa, Peshawar.
8. PS to Minister E&SE, Khyber Pakhtunkhwa.
9. PS to Chief Secretary, Khyber Pakhtunkhwa.
10. PS to Secretary, E&SE, Department, Khyber Pakhtunkhwa.
11. PA to Additional Secretary, E&SE, Deptt.
12. PA to Deputy Secretary (Admn), E&SE Deptt.
13. Officers concerned.
14. Office order file.


(MUJEEB-UR-REHMAN)
SECTION OFFICER (SCHOOLS/MALE)

-16-

EXECUTIVE DISTRICT OFFICE (E&S) EDUCATION MARDAN.

NOTIFICATION.

In compliance with Notification No. SO(S/M) E&SED/3-2/2011/EDOs/
EMC (BPS-19) Govt; of Khyber Pakhtunkhwa E&S Edu; Department Peshawar
Dated 24.02.2011, I Mr Muhammad Uzair Ali took over the charge of the post of
Executive District Officer (E&S) Education Mardan On 13.03.11 E/P

All kind of Secret/Confidential Correspondance shall be addressed to
me by name.
Contact No 0937-9230151 Fax No:0937-9230151.

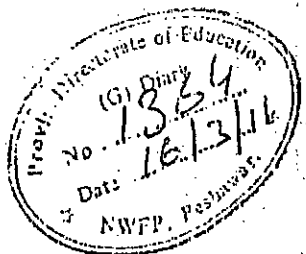
(MUHAMMAD UZAIR ALI)
EXECUTIVE DISTRICT OFFICER
(E&S) EDUCATION MARDAN.

Endst; No. 3021/G, dated Mardan the 8/3/11

Copy forwarded to the.-

1. P/S to Hon; Minister for (E&S) Education Govt; of Khyber Pakhtunkhwa Peshawar pl;
2. P/S to Hon. Secretary to Govt; of Khyber Pakhtun khwa (E&S) Education Department Peshawar please.
3. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
4. Manager Govt; Printing Press khyber pakhtun khwa Peshawar.
5. P/A to Commissioner Mardan Division Mardan.
6. P/A to District Co-Ordination Office Mardan.
7. District Officers (M/F) Local office.
8. Manager National Bank of Pakistan Main Branch Mardan.
9. District Accounts office Mardan.
10. Deputy District Officers (M/F) Mardan and Takhi Bhai.
11. All Principals /Head Masters/Head Mistresses GHSS/GHSS/GHS/GHS, in District Mardan.

Je
EXECUTIVE DISTRICT OFFICER
(E&S) EDUCATION MARDAN



**GOVERNMENT OF
KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES & LIBRARIES
DEPARTMENT**

Dated Peshawar the 21/06/2011

NOTIFICATION

NO.SO(AO)HE/XIII-1/11/Political Science (B-19) Consequent upon the recommendation of Khyber Pakhtunkhwa Public Service Commission, the Competent Authority is pleased to appoint the following recommendees as Male Associate Professor of Political Science (BPS-19) of College Cadre in Higher Education Department, with immediate effect, on the terms & conditions noted below, and to post them in the colleges noted against each, read with the following adjustment :-

S.No	Name with Father's Name	Place of Posting	Remarks
1	Alisan-ur-Rahim S/O Amir Ullah, Assistant Professor of Political Science (BPS-18) Govt; Postgraduate College No.1 Abbottabad.	Associate Professor (BPS-19) Govt; Postgraduate Haripur.	Vice S.No.1, of below adjustment.
2	Bakhtiar S/O Rasool Khan, Assistant Professor of Political Science (BPS-18) Govt; Postgraduate College Swabi.	Associate Professor (BPS-19) Govt; Postgraduate College Swabi.	Against vacant post
3	Muhammad Arshad Mehmood S/O Muhammad Iqbal. Assistant Professor of Political Science (BPS-18) Govt; Postgraduate College No.1 Abbottabad.	Associate Professor (BPS-19) Govt; Postgraduate College Haripur.	A.V.P.
4	Muhammad Uzair Ali S/O Abdul Quyyum, Lecturer in Political Science (BPS-17) Govt; Degree College Lahor (Swabi)	Associate Professor (BPS-19) Govt; Degree College Yar Hussain (Swabi)	A.V.P.

Adjustment.

S.No	Name of officer & Designation / College	Proposed Adjustment	Remarks
01	Mr. Mehtab Ahmad, Associate Professor of Economics (B-19) Govt. Postgraduate College Haripur	Associate Professor (BPS-19) Govt; Postgraduate College No. 1, Abbottabad.	Vice. S.No.2 below
02	Mr. Zahid Ullah, Associate Professor of Chemistry (B-19) Govt. Postgraduate College No.1 Abbottabad.	Associate Professor (BPS-19) Govt; Degree College, Jowar, District Bunir.	A.V.P

TERMS & CONDITIONS

- i. The officers will have all rights / privileges contained in NWFP, Civil Servants Act, 1973. According to Amendment of Section-19 of the NWFP Civil Servants (Amendment) Act 2009, all the officers (except S.No.3) have opted for retaining the benefit of pension & gratuity as allowed to them under their previous terms of appointment, while the officer at S.No.3 will continue C.P. Fund according to his previous terms & conditions.
- ii. Their Inter-se-seniority will be fixed according to the order of merit assigned by the Khyber Pakhtunkhwa, Public Service Commission.

Continued on Page -2-

- iii. In case of resignation, the officers will have to give one month's prior notice. In absence of such notice their one-month's pay/allowances be forfeited to Government.
- iv. The selectees should join their post within 30-days of the issue of this notification. The Director Higher Education Khyber Pakhtunkhwa, Peshawar should furnish certificate to the effect that the selectees have joined the post or otherwise, after one month of the issue of this notification.
- v. In case of disciplinary matter, NWFP, Civil Servant Act, 1973 and NWFP, Civil Servants Removal from Service (Special Powers) Ordinance 2000 shall be applicable.
- vi. They will be on probation for a period of two years extendable upto three years.

SECRETARY HIGHER EDUCATION

Endst: No. & Date Even.

Copy to the :-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director Higher Education Khyber Pakhtunkhwa, w/r to his letter No.12327/A-12/CA-I/Estt; Branch/Ahsan-ur-Rahim/Pol; Sc; dated 09/05/2011.
3. Principals, Government Colleges concerned.
4. District Accounts Officers concerned.
5. Deputy Director (I.T) Planning Cell Higher Education Department, Peshawar.
6. Deputy Secretary-II, Khyber Pakhtunkhwa, Public Service Commission, 02-Fort Road, (Near Governor House) Peshawar Cantt, w/r to his letter No.58847 dated 11/12/2010, and No.014131 dated 13/04/2011.
7. Officers concerned.

(PIR MUHAMMAD KHAN)
SECTION OFFICER (AO)

P-1066

-19-

The secretary,
E&SE Khyber Pakhtunkhwa Peshawar.

Subject: Application for Lien

Respectfully stated that I served as EDO in the E&SE Department of Khyber Pakhtunkhwa from 1/3/2011 to 19/7/2011. Now I have been appointed as Associate Professor of Political Science through regular channel by the Higher Education Department Khyber Pakhtunkhwa vide notification No SO(AO)HE/X111-1/11 Political Science (BPS-19) Dated 21/6/2011. Sir I am joining the Higher Education Department and would request you to allow me join the new department on two years lien.

I shall be very grateful to you for this great favour. Thanks.

Muhammad Uzair Ali
Outgoing EDO
E&SE Deptt: Nowshera

Subject No: 241-1-14 Dated: 20/7/2011

Forwarded for necessary action, please.

Copy forwarded for information an n/a to:

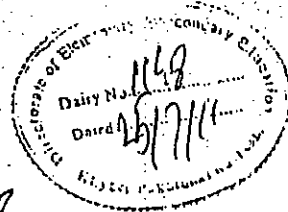
1. PS to Minister for E&SE Khyber Pakhtunkhwa Peshawar.

2. Directress E&SE Khyber Pakhtunkhwa Peshawar.

3. Officer concerned:

4. Office copy.

Executive District Officer
E&SE Nowshera



Handwritten initials 'JG'



P 114
GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

-20-

Dated Peshawar the October 31, 2011

NOTIFICATION

NO.SO(S/M) 4-8/2011/Relieving/ Muhammad Uzair Ali: Consequent upon his appointment as Associate Professor (BS-19) in Govt. of Khyber Pakhtunkhwa Higher Education, Archives & Libraries Department vide notification dated 21-06-2011, the Competent Authority is pleased to relieve Mr. Muhammad Uzair Ali, Executive District Officer (BS-19) E&SE Management Cadre (OSD) w.e.f. 19-07-2011 (A.N). He will clear all liabilities if pending against him.

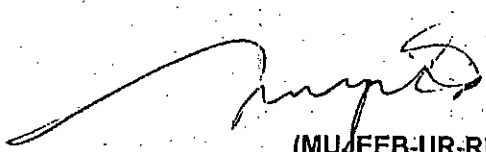
2. No TA/DA will be paid by this Department.

SECRETARY

Endst: of even No. & date.

Copy forwarded for information and further necessary action to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Accounts Officer concerned.
4. Incharge EMISE E&SE Department.
5. PS to Secretary E&SE Department, Khyber Pakhtunkhwa.
6. PS to Secretary, Higher Education Department, Khyber Pakhtunkhwa.
7. Officer concerned.
8. Office order File.


(MUEEB-UR-REHMAN)
SECTION OFFICER (SCHOOLS/MALE)



**GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT**

-21-

Dated Peshawar the December 28, 2012

NOTIFICATION

NO.SO(S/M)E&SED/3-2/2012/Management Cadre: In pursuance of the Khyber Pakhtunkhwa Local Government Act, 2012 (Khyber Pakhtunkhwa Act No. VIII of 2012) and Govt of Khyber Pakhtunkhwa, Establishment & Administration Department Notification No.SO(E-1)E&AD/4-49/2012 dated 27-12-2012, the positions in Elementary & Secondary Education Department at District level are reorganized as under w.e.f January 1st 2013:-

NO.	EXISTING	REORGANIZED/REDESIGNATED
1.	Executive District Officer (E&SE) (BS-19)	District Education Officer Male (BS-19)
2.	Nil	District Education Officer Female (BS-19)
3.	District Officer (E&SE) Male (BS-18)	Deputy District Education Officer Male (BS-19)
4.	District Officer (E&SE) Female (BS-18)	Deputy District Education Officer (BS-18) Female
5.	Deputy District Officer (E&SE) Male (BS-17)	Sub Divisional Education Officer Male (BS-17)
6.	Deputy District Officer (E&SE) Female (BS-17)	Sub Divisional Education Officer Female (BS-17)

- The District setup of Elementary & Secondary Education shall stand segregated from Local Government institutions established under the Khyber Pakhtunkhwa Local Government Ordinance, 2001 (Khyber Pakhtunkhwa Act No.XIV of 2001) and shall realign with Elementary & Secondary Education Department at provincial level under the Act.
- Deputy District Education Officers (Female) BS-18 are assigned the additional charge of the post of District Education Officer (Female) BS-19 as a stop gap arrangement till posting/appointment of regular District Education Officer (Female) BS-19.

**SECRETARY
E&S EDUCATION DEPARTMENT**

Adell Dir. Dm
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DD F/A
28/12/12

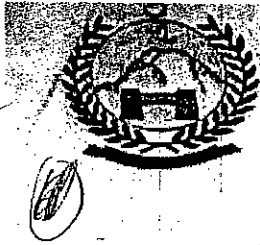
Copy forwarded to the:

- Chief Secretary, Govt of Punjab, Sindh, Balochistan and Gilgit Baltistan.
- Additional Chief Secretary, P&D Khyber Pakhtunkhwa
- Senior Member Board of Revenue, Khyber Pakhtunkhwa.
- Additional Chief Secretary FATA Secretariat.
- Secretary to Governor, Khyber Pakhtunkhwa.
- Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
- All Divisional Commissioners in Khyber Pakhtunkhwa.
- Accountant General, Khyber Pakhtunkhwa Peshawar.
- All Directors of E&S Education in Khyber Pakhtunkhwa.
- All District Coordination Officer in Khyber Pakhtunkhwa.
- All Executive District Officer (E&SE) in Khyber Pakhtunkhwa.
- Director Information, Khyber Pakhtunkhwa.
- PS to Secretary E&SE Department, Khyber Pakhtunkhwa.
- PS to Additional Secretary, E&SE Department.
- Incharge EMIS E&SE Department.
- Manager, Govt Printing Press Peshawar.

Mujeeb-ur-Rehman

**(MUJEEB-UR-REHMAN)
SECTION OFFICER (SCHCOLS/MALE)**

(Signature)



GOVERNMENT OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES AND LIBRARIES
DEPARTMENT

"F"

No.SO(C-1)/HE/1-5/12/M. Uzair Ali
Dated Peshawar the 11/09/2013

1

-22-

To ✓
The Secretary to Govt; of Khyber Pakhtunkhwa,
Elementary & Secondary Education Department,
Peshawar.

Subject: REQUISITION OF SERVICES.

Dear Sir,

I am directed to refer to the subject noted above and to enclose herewith a copy of Chief Minister's Secretariat letter NO.SO-1/CMS/KPK/2013-3- 3/4319, dated 06/09/2013 addressed to this Department and a copy thereof endorsed to the your Department and to convey this Department's NOC regarding placing the services of Mr. Mohammad Uzair Ali, Associate Professor of Political Science (BPS-19) Govt; Degree College Yar Hussain (Swabi) at disposal of Elementary & Secondary Education Department for appointment as District Education Officer-Nowsheera, as desired by the Chief Minister's Secretariat in their letter under reference.

Yours Sincerely

(Muhammad Farooq Shah)
SECTION OFFICER (C-1)

SO SO/M
SAX urgent

16/9/13

Encl: No. & Date as above.
Copy to the Section Officer, Chief Minister's Secretariat Khyber Pakhtunkhwa Peshawar, w/r to his letter quoted above.

SECTION OFFICER (C-1)

3388
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GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Dated Peshawar the September 30, 2013

NOTIFICATION

6-23-

NO.SO(S/M)E&SED/4-16/2013/Mr. Muhammad Uzair Ali (BS-19): The Competent Authority is pleased to allow Mr. Muhammad Uzair Ali, Associate Professor (BS-19) Higher Education Archives & Libraries Department to rejoin Elementary & Secondary Education Department as District Education Officer (Male) BS-19 in the Management Cadre with immediate effect.

SECRETARY

Endst: of even No. & Date

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Secretary, Higher Education, Archives & Libraries Department.
3. PSO to Chief Minister, Khyber Pakhtunkhwa, Peshawar.
4. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
5. Director Higher Education Khyber Pakhtunkhwa Peshawar.
6. District Accounts Officer, Nowshera/ Swabi.
7. District Education Officer (Male), Nowshera/ Swabi.
8. PS to Secretary E&SE Department, Khyber Pakhtunkhwa, Peshawar.
9. PS to Special Secretary E&SE Department, Khyber Pakhtunkhwa, Peshawar.
10. PA to Additional Secretary E&SE Department, Khyber Pakhtunkhwa, Peshawar.
11. Incharge EMISE E&SE Department.
12. Officer concerned. *DGC (M) NSR*
13. Office order file.

Mujeeb-ur-Rehman
(MUJEEB-UR-REHMAN)
SECTION OFFICER (SCHOOLS/MALE)



-24- A-111 - VII

To

The Secretary to
Govt of Khyber Pakhtunkhwa
Elementary & Secondary Education Department

Subject: INTER-SE-MERIT OF THE EDO'S (B-19) IN E&SED.

I directed to refer to the subject cited above and to forward herewith inter-se-merit of EDO,s(B-19) for your record and necessary action please.

S.No	Name with Father Name	Domicile	Quota
1.	Ghulam Qasim Khan S/O Abdul Majeed Khan	D.I.Khan /4	Open
2.	Basher Hussain Shah S/o Taj Hussain Shah	Haripur/5	Teaching
3.	Muhammad Rafiq S/O Niaz Khamim	Karak/4	Teaching
4.	Abdul Malik S/o Muhammad Mushtau	D.I.Khan /4	Open
5.	Umar Khan S/O Muhammad Hassan	Tank/4	Open
6.	Feroz Hussain Shah S/O Sultan Ali Shah	D.I.Khan/4	Teaching
7.	Abdur Rashid S/O Ghulam Jaffar	D.I.Khan/4	Teaching
8.	Muhammad Ibrahim S/O Buzurg Jamber	Dir/3	Teaching
9.	Shamas Khan S/O Mir Ahmed Khan	Gadoon/3	Open
10.	Sultan Mahmood Mian S/O Muntaz	Swat/3	Teaching
11.	Abdus Salam S/O Hameed Ullah Jan	D.I.Khan/4	Open
12.	Abdul Basit S/O Qavi Ullah	Peshawar/2	Open
13.	Roz Wali Khan S/O Jannat Noer	Karak/4	Teaching
14.	Siraj Muhammad S/O Muhammad Khan	Peshawar/2	Open
15.	Coher Ali Khan S/O Muhammad Ali-Khan	Peshawar/2	Teaching
16.	Muhammad Uzair Ali S/O Abdul Qayyum	Swabi/2	Open
17.	Abdullah S/O Mir Azam	MKD Agy/5	Teaching
18.	Nazir Khan S/O Gul Payo Khan	Karak/4	Open
19.	Muhammad Riaz S/O Ghulam Khan	Mansehra/5	Teaching
20.	Jehan Muhammad S/O Sultan Muhammad	Nowshera/2	Teaching

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22.	Muhammad Shaukat S/O Abdul Jalil	Mansehra/5	Te. ching
23.	Haziq ur Rehman S/O Sarwar Jan	Karaka/4	Te. ching
24.	Jaffar Mansoor Abbasi S/O Cauhar Rehman Abbasi	Alibottabad/5	Teaching
25.	Zia ud din S/O Ghulam Mohiy ud Din	Lakki/4	Teaching
26.	Attu Ullah Khan S/O Muhammad Nawaz Khan	Lakki/4	Teaching
27.	Samina Altaf S/O syed Altaf Hussain	Haripur/5	Teaching

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(Ilyas Shah)
Deputy Secret

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2/12/2013



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

26
-26-

NOTIFICATION

Dated Peshawar the 08.05.2012

NO. SO (S/M) E&SED/4-25/2012/Final Seniority List of MC (BPS -19): In exercise of powers conferred under Sub Section (1) of Section -8 of the North West Frontier Province (now Khyber Pakhtunkhwa) Civil Servant Act: 1973 NO-XVIII of 1973, the Final Seniority List of EDOs/Additional Directors (BPS-19) of Management cadre Elementary & Secondary Education Department as it stood on 22/02/2012, is hereby notified for information of all concerned.

CHIEF SECRETARY
Khyber Pakhtunkhwa

Endst: of even No & Date.

Copy forwarded to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar with the request to circulate the above Seniority list to all concerned.
2. Director Education (FATA) Khyber Pakhtunkhwa, Peshawar
3. Director Curriculum & Teacher Education Khyber Pakhtunkhwa, Abbott Abad.
4. Director PITE, Khyber Pakhtunkhwa, Peshawar.
5. All Executives District Officers, E&SE in Khyber Pakhtunkhwa.
6. PS. to Secretary (E&SE) Deptt. Khyber Pakhtunkhwa, Peshawar.
7. Office order file

(MUJEEB-UR-REHMAN)
SECTION OFFICER (SCHOOLS/MALE)

OFFICE OF THE DIRECTOR ELEMENTARY AND SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR

Endst: No 1501-51 /Estab/ Final Seniority List of MC (BPS -19) Dated Peshawar the 11.05.2012.

Copy of the above is forwarded along with Final Seniority List of MC (BPS -19) for information to the:-

- 1-25 All the Executive District Officers Elementary & Secondary Education Khyber Pakhtunkhwa.
- 26-48 All the Officers Concerned.
49. Section Officer (Schools/Male) Elementary & Secondary Education Department, Government of Khyber Pakhtunkhwa Peshawar.
50. P/S Secretary, Government of Khyber Pakhtunkhwa Elementary & Secondary Education, Department, Peshawar.
51. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.

Dy: Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

203

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-27-

**FINAL SENIORITY LIST OF OFFICERS BPS-19 (EXECUTIVE DISTRICT OFFICERS/ADDITIONAL DIRECTORS),
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT MANAGEMENT CADRE AS IT STOOD ON 22-02-2012.**

N	NAME OF OFFICERS WITH DESIGNATION	Date of Birth	Domicile	Date of 1st Apptt: in Edu; Deptt;	Date of Apptt/Promotion as EDO /Addl Dir	Method of Recruitment	Remarks
1	Mr: Bashir Hussain Shah Additional Director (P&D) /CPO E&SE Khyber Pakhtunkhwa	10.01.1957	Haripur	01.12.1975	24.02.2011	Direct Selectee against 60% Departmental Quota	
2	Mr: Muhammad Rafique, Additional Director (E&S) E&SE Khyber Pakhtunkhwa	14.02.1968	Karak	09.08.1978	24.02.2011	-do-	
3	Mr: Feroz Hussain Shah, EDO (E&SE) D.I Khan	25.10.1954	DIKhan	11.11.1975	24.02.2011	-do-	
4	Mr: Abdur Rashid, EDO (E&SE) Bannu	15.05.1957	DIKhan	24.06.1978	24.02.2011	-do-	
5	Mr: Muhammad Ibrahim, EDO (E&SE) Dir Lower	16.03.1963	Dir Lower	10.02.1988	24.02.2011	-do-	
6	Mr: Sultan Mehmood Mian, EDO (E&SE) Swat	21.12.1955	Swat	20.12.1983	24.02.2011	-do-	
7	Mr: Roz Wali, EDO (E&SE) waiting for posting	10.04.1957	Karak	01.12.1988	24.02.2011	-do-	
8	Gohar Ali Khan EDO (E&SE) Peshawar	01.01.1967	Peshawar	22.04.1990	24.02.2011	-do-	
9	Mr: Abdullah, EDO (E&SE) Shangla	02.09.1956	Malakand	04.03.1984	24.02.2011	-do-	
10	Muhammad Riaz EDO (E&SE) Abbottabad	02.05.1960	Mansehra	24.05.1988	24.02.2011	-do-	
11	Jehan Muhammad EDO (E&SE) Hanagu	04.01.1961	Nowshera	26.10.1986	24.02.2011	-do-	
12	Huzia ur Rahman EDO (E&SE) Karak	06.02.1962	Karak	01.09.1985	24.02.2011	-do-	
13	Jaffar Mansoor Abbasi Working as Pri GHS No.1 Abbottabad	15.09.1968	Abbottabad	11.02.1999	24.02.2011	-do-	
14	Zia ud Din EDO (E&SE) Dir Upper	01.09.1970	Lakki Marwat	01.09.2009	24.02.2011	-do-	
15	Atta Ullah Khan EDO (E&SE) Charsadda	18.03.1960	Lakki Marwat	16.02.1987	24.02.2011	-do-	
16	Mr: Ghulam Qasim Khan, EDO (E&SE) Tank	10.01.1956	DIKhan	03.11.1973	24.02.2011	Direct Selectee against 40% Open Market Quota	
17	Mr: Abdul Malik, EDO (E&SE) Lakki Marwat	07.01.1954	D.I Khan	16.02.1977	24.02.2011	-do-	
18	Umar Khan EDO (E&SE) Mansehra	12.02.1962	Tank	01.10.1986	24.02.2011	-do-	
19	Shamas Khan Additional Director (P&D) E&SE Khyber Pakhtunkhwa	13.02.1954	Swabi	25.03.1975	24.02.2011	-do-	
20	Abdul Salam EDO (E&SE) Swabi	01.04.1962	D.I Khan	09.10.1985	24.02.2011	-do-	
21	Siraj Muhammad EDO (E&SE) Chitral	20.04.1960	Peshawar	29.03.1988	24.02.2011	-do-	
22	Nazir Khan, EDO (E&SE) Kohat	06.03.1959	Karak	24.10.1989	24.02.2011	-do-	
23	Sahibzada Hamid Mehmood EDO (E&SE) Torgher	06.09.1965	Peshawar	03.12.1989	24.02.2011	-do-	

CHIEF SECRETARY
KHYBER PAKHTUNKHWA

150

Endst: No. SO (S/M) E&SED/4-25/2012/Final Seniority List of MC (BPS-19):
Copy of the above is forwarded for information to the :-

Dated Peshawar the, 08.05.2012

1. Director Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. Director of Education (FATA) Khyber Pakhtunkhwa, Peshawar.
3. Director (PITE) Khyber Pakhtunkhwa, Peshawar.
4. Director Curriculum & Teacher Edu; Khyber Pakhtunkhwa, A/Abad.
- 5-29. All the Executive District Officers (E&SE) in Khyber Pakhtunkhwa.
- 30-52. All officers concerned.
53. Ps to Secretary to Govt; of Khyber Pakhtunkhwa, (E&SE) Peshawar.

SECTION OFFICER (SCHOOLS/MALE)

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To
 The Honourable Secretary,
 Elementary & Secondary Education Department,
 Govt. Of Khyber Pakhtunkhwa.

Subject: APPEAL AGAINST TENTATIVE SENIORITY LIST OF DISTRICT EDUCATION OFFICERS/ADDITIONAL DIRECTORS (MANAGEMENT CADRE) DPS-19 MALE COMMUNICATED VIDE DIRECTORATE LETTER NO.3002 DATED 21/10/2021.

Honourable:-

Reference tentative seniority list of District Education Officers/Additional Directors (Management Cadre) DPS-19 Male communicated to your goodself vide Directorate letter No.3002 dated 21/10/2021, the undersigned humbly submits as follows:

1. That the Seniority of the District Education Officers/Additional Directors has never been updated since 2012 despite statutory obligation as contained in Civil Service Act 1973, Section 8(S).
2. That the same seniority of 2012 does not contain the seniority of the undersigned along with three other MC BS-19 officers.
3. That time and again the undersigned submitted his appeals to high ups for updation of DEOs/Additional Directors seniority list and inclusion of his name at the correct merit order in the same finally propelling the Directorate of E&SE to draft and submit to your goodself the tentative seniority vide No.3002 dated 21/10/2021. See pages 4 & 5.
4. That the subject Tentative Seniority, however, is discriminative, devoid of merit and is diametrically against inter-se seniority determined by Khyber Pakhtunkhwa Public Service Commission (KPPSC) and is therefore illegal and unlawful.
5. That it is to be noted that all MC BS-19 officers were recruited on basis of initial appointment as recommended by the KPPSC vide No.K.P.K.PSC-SR-VI/32104 Dated 18/06/2010 while their inter-se seniority was to be determined later in accordance with the inter-se seniority as determined by the KPPSC. See page 6 & 7.
6. That seniority of officers appointed on initial basis on recommendation of the public service commission has to be determined in accordance with the inter-se merit/seniority as determined by the public service commission in accordance with section 8 of the Civil Servants Act, 1973 and Part-VI; Seniority, Rule 17 (1) a of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989.
7. That the referred tentative seniority has been drafted in violation of the seniority rules set out in the Khyber Pakhtunkhwa Civil Servants Act 1973 and the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 by allowing arbitrary and unlawful preference to below inter-se merit officers selected on departmental 60% quota over those selected on 40% open marked quota.
8. That the mentioned tentative list has not been drafted in accordance with the inter-se seniority determined and communicated to the Director E&SE by KPPSC vide dated 19/11/2013 and vide No.PSC/DR/19/(DR)/2020 Dated 21/07/2020 (see pages 8, 9, 10 & 11) but on its category-wise (Teaching Cadre & Open Market) recommendations for appointment vide letter to Secretary E&SED No.K.P.K.PSC-SR-VI/32104 Dated 18/06/2010 meant only for appointment/posting and not for determination of inter-se seniority (see pages 6 & 7).
9. That Para No.2 of the KPPSC recommendations for appointment vide letter to Secretary E&SED vide No.K.P.K.PSC-SR-VI/32104 Dated 18/06/2010 clearly mentions that "Inter-se Seniority of the recommendees will be sent later and the aetial chronological order does not confer the right of seniority in this regard". See page 7, para-2.
10. That the referred tentative seniority communicated to your goodself by the Directorate vide No. 3002 dated 21/10/2021 has intentionally omitted the afore-mentioned inter-se merit/seniority of KPPSC for seniority determination of DEOs/Additional Directors by not mentioning the inter-se merit order and score just to hide the actual seniority position, cover up the historic injustice meted out to deserving officers and illegally favour some below inter-se merit officers. See pages 8, 10 & 11 column 2 & 3.
11. That the E&SE Department in its own letters to Director E&SE vide Nos.SQ(S)/FJE&SID/4-24/2018/Seniority List/BS-18/F/MC Dated Peshawar the July 5th, 2018 and SQ(S)/FJE&SID/4-24/2018/Seniority List/BS-18/F/MC Dated Peshawar the July 18th, 2018 intimated that for seniority "administrative department or any other authority has no power to change merit as communicated by Khyber Pakhtunkhwa Public Service Commission. See pages 12 & 13.

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- 12. That time and again the E&SE Department has directed the Director E&SE to convey updated tentative seniority in accordance with the set rules, policy and inter-se merit but each time he has unfortunately failed to submit the updated tentative seniority legally in its legally correct form. See pages 14, 15 & 16.
- 13. That it is pertinent to mention that the inter-se seniority of the Deputy District Education Officers (M/F) has already been determined in accordance with the inter-se merit/seniority determined by the KPPSC and not on GO-40 (Departmental & Open Market Quotas) ratio for appointment and that these officers have got their promotion to BS-19 on basis of the same inter-se seniority conveyed by KPPSC.
- 14. That if final seniority based on this referred tentative seniority is determined and notified it will surely deprive the undersigned of his due rights under civil service rules protected under the Constitution of Islamic Republic of Pakistan. See page 17 for KPPSC-based correct version of Seniority of DEOs/Additional Directors.

Honourable Sir,

As correct merit-based seniority in cases of initial appointments is the basic right of every civil servant upon which depends the whole service career of a civil servant and as the Honourable Competent Authorities are the custodians of the due/fundamental rights of their subordinate civil servants, your goodness is, therefore, very humbly requested to consider this appeal for inclusion and correctly placing the name of the undersigned in the seniority list of Additional Directors/DOs (DEOs) B-19 Management Cadre as per the well-established rules set out in the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989 Part-VI, Seniority: Rule 17 (1) (a).

The undersigned shall be very grateful and obliged to your goodness for the great gesture and act of administrative justice.

[Signature]
 Muhammad Uzair Ali
 Appellant MC BS-19
 Additional Director
 Directorate of E&SE Khyber Pakhtunkhwa

Copy in advance to the Honourables:-

4/49
 1-11/11
[Signature]
 11/11
[Signature]

- 1. Chief Secretary, Government of Khyber Pakhtunkhwa.
- 2. Secretary Establishment, Government of Khyber Pakhtunkhwa.
- 3. Special Secretary, Elementary & Secondary Department, Government of Khyber Pakhtunkhwa.
- 4. Additional Secretary Estab. Elementary & Secondary Education, Government of Khyber Pakhtunkhwa.
- 5. P.A. to Director Elementary & Secondary Education, Khyber Pakhtunkhwa.
- 6. Copy for personal Record.

[Signature]
 Muhammad Uzair Ali
 (Appellant MC BS-19)
 Additional Director
 Directorate of E&SE, Khyber Pakhtunkhwa

Documents attached.

- 1. Deputy Director's letter to Secretary E&SED vide No.3002 dated 21/10/2021. Page 4.
- 2. Tentative Seniority list communicated vide the above-mentioned letter. Page 5
- 3. Recommendations of the KPPSC for appointments/passing of male district education officers/Additional Directors vide No.K.P.K.PSC-SR-VI/32104 Dated 18/05/2010. Pages 6 & 7.
- 4. KPPSC inter-se seniority of DEOs/Additional Directors dated 19/11/2013. Page 8.
- 5. KPPSC letter to Director vide No. PSC/OR/13/101/2020 Dated 21/01/2020. Page 9.
- 6. KPPSC inter-se seniority communicated to Director vide the above-mentioned letter. Pages 10 & 11.
- 7. Section Officer (S/F) letter to Director vide No. SO(S/F)/E&SED/4-24/2018/Seniority List/BS-18/F/ATC Dated Peshawar the July 5th, 2018. Page 12.
- 8. Section Officer letter to Director vide No. SO(S/F)/E&SED/4-24/2018/Seniority List/BS-18/F/ATC Dated Peshawar the July 18th, 2018. Page 13.
- 9. Section Officer (Schools Male) letter to Director vide No. SO(S/F)/E&SED/4-25/2018/Promotavi BS-19 to 20 (ATC) Dated Peshawar the May 14, 2018. Page 14.
- 10. Section Officer (Schools Male) to Director vide No SO(SA)/E&SED/4-25/2018/Seniority of ATC Officers BS-19 Dated Peshawar the July 27, 2018. Page 15
- 11. Section Officer (Schools Male) letter to Director vide No. SO(S/M)/E&SED/4-25/2018/Seniority of Abdul Bari Dated Peshawar the January 26, 2016. Page 16.

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- 12. Proposed/Requested KPPSC-based draft seniority of DEOs/Additional Directors, Page 17
- 13. Section Officer (Schools M/F) letter to Director vide No. SO(SF)(S&SED)/4-24/2021/Seniority List Dated Postwar the September 21, 2021, Page 18.
- 14. Application of the undersigned to Director E&SC dated 04/10/2021 for inclusion of seniority list and inclusion of his name in the same list, Page 19.

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**DIRECTORATE OF ELEMENTARY &
SECONDARY EDUCATION**

- 31 -

No. 8075 Date: 1 Peshawar the 10th November 2021

To

The Honourable Secretary,
Elementary & Secondary Education Department,
Govt: Of Khyber Pakhtunkhwa.

Subject: TENTATIVE SENIORITY OF DISTRICT EDUCATION OFFICERS/ADDITIONAL DIRECTORS BPS-19
MALE (MANAGEMENT CADRE) AS STOOD ON 12.10.2021

Sir,

In continuation of the appeal dated 01/11/2021 (copy attached as pages 4-6), the undersigned submits this fresh appeal in the backdrop of the tentative seniority of MC BS-19 officers (male) recently uploaded on official website for perusal of all concerned by the E&SE Department vide No.SO(5M)E&SE/4-25/2021/Tentative S.List of MC BS-19 dated 02/11/2021. Although, the E&SE has finally granted to include the name of the undersigned along with other three missing officers in the tentative seniority list but unfortunately it has still not been generous enough to enter the name of the appellant at the right place and order in the uploaded seniority list. Hence, the undersigned appellant feels urgency to resubmit his appeal with the following famous points/pleas for consideration before the issuance/notification of final seniority of DEOs/Additional Directors.

1. That the subject Tentative Seniority uploaded on E&SED official website is discriminatory, devoid of merit and is diametrically against inter-se seniority determined and conveyed to the Department by Khyber Pakhtunkhwa Public Service Commission (KPPSC) and is therefore illegal and unlawful.
2. That it is discriminatory in that it has drawn artificial, self-imagined and self-formulated distinction between the officers selected on 60% teaching quota and 40% open market quota.
3. That it is devoid of merit in that it has arbitrarily, illegally and unlawfully given preference in seniority to below inter-se merit officers over those high in merit against the inter-se merit/seniority determined and conveyed by the KPPSC vide Nos.SR1/036824 dated 02/8/2012; dated 19/11/2013 and PSC/DR/19/(DR)/2020 Dated 21/07/2020 (see pages 7-12).
4. That the referred uploaded tentative seniority has intentionally omitted the afore-mentioned inter-se merit/seniority of KPPSC for seniority determination of DEOs/Additional Directors by not mentioning the inter-se merit order and score just to hide the actual seniority position, cover up the historic injustice meted out to deserving officers and illegally favour below inter-se merit officers. See column 2&3 on pages 9, 11-12.
5. That to hoodwink the officers selected on open market reserved seats and deprive them along with the undersigned of their due right, the uploaded seniority has purposely been drafted with mala fide intention on recommendations for initial appointment by the KPPSC vide No.K.P.K.PSC-SR-VI/32104 Dated 18/06/2010 which was meant only for appointment/posting of the subject officers (see page 13) and not for determination of their inter-se seniority wherein the Commission clearly mentioned in Para-2 that the "Inter-se Seniority of the recommendees will be sent later and the arial chronological order does not confer the right of seniority in this regard". See page 14 Para-2.
6. That as mentioned above, time and again, the KPPSC has conveyed the inter-se seniority to the Department but still the uploaded tentative seniority has been drafted diametrically against the same only to indicate ulterior motives behind it.
7. That it is a well-established legal norm that seniority of officers appointed on initial basis on recommendation of the public service commission has to be determined in accordance with the inter-se merit/seniority as determined by the public service commission in pursuance of section 8 of the Civil Servants Act, 1973 (see pages 15-16) and Part-VI; Seniority, Rule 17 (1) (a) of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 (see page 17).
8. That the referred tentative seniority has been drafted in violation of the seniority rules set out in the Khyber Pakhtunkhwa Civil Servant Act 1973 and the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 by allowing arbitrary and

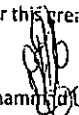
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- unlawful preference to below inter-se merit officers selected on departmental 60% quota over those selected on 40% open marked quota.
9. That despite the crystal-clear fact, that all the top slot BS-19 MC officers including the undersigned were recruited/appointed on initial basis even then their respective inter-se seniority as uploaded has not been drafted in accordance with the established rules of seniority mentioned in Para-6.
 10. That the Directorate of E&SE, Khyber Pakhtunkhwa, without taking side of either party, is duty bound to draft and submit to your goodself the legally correct form/draft of the subject seniority for uploading and further necessary action being custodian of the legally due right of its subordinate officers/officials.
 11. That it is worth mentioning that time and again the E&SE Department has directed the Director E&SE to convey updated tentative seniority in accordance with the set rules, policy and inter-se merit but each time he has unfortunately failed to submit the updated tentative seniority legally in its legally correct form. See pages 18-20.
 12. That the E&SE Department vide its letters Nos.SO(S/F)E&SED/4-24/2018/Seniority List/BS-18/F/MC Dated Peshawar the July 5th, 2018 and SC(S/F)E&SED/4-24/2018/Seniority List/BS-18/F/MC Dated Peshawar the July 18th, 2018 has already clarified to the Directorate that for determination of seniority "administrative department or any other authority has no power to change merit as communicated by Khyber Pakhtunkhwa Public Service Commission. See pages 21-22.
 13. That the above subject impugned tentative seniority amply demonstrate that those at the helms of the establishment of the Directorate are unable to discharge their official responsibilities in accordance with merit, rules, regulations, policies and objectivity and, therefore, they may be strictly directed to follow rules, regulations, equity and justice as no one is above law and that rule of law equally applies to all without prejudice to or distinction of cost, color, creed and socio-politico-economic or official status.
 14. That it is pertinent to mention that the inter-se seniority of the Deputy District Education Officers (M/F) has already been determined in accordance with the inter-se merit/seniority determined by the KPPSC and not on 60-40 formula (Departmental & Open Market Quotas) ratio for appointment despite the fact that many of them had appealed for seniority to be based on 60-40 % departmental and open market ratio and that these DDEOs (M/F) have been ultimately promoted to BS-19 on basis of the inter-se seniority conveyed by KPPSC.
 15. That the addition of this fresh promoted DEOs (based on KPPSC inter-se seniority) into the mainstream of pioneer DEOs has already spawned a new but dialectically awkward creed/blend of equal and unequal in the Management Cadre of the E&SE Department.
 16. That if final seniority based on this referred uploaded tentative seniority is determined and notified it will surely deprive the undersigned of his due rights under civil service rules protected under the Constitution of Islamic Republic of Pakistan in which case the appellant reserves constitutional right to knock at the door/s of higher forum/s available under the law for ultimate justice. See page 23 for KPPSC-based correct version of Seniority of DEOs/Additional Directors.

Honourable Sir,

As correct merit-based seniority in cases of initial appointments is the basic right of every civil servant upon which depends the whole service career of a civil servant and as the Honourable Competent Authorities are the custodians of the due/fundamental rights of their subordinate civil servants, your goodself is once again very humbly requested to issue necessary orders for necessary changes in the uploaded seniority list and placing the name of the undersigned at the right order and position in the inter-se seniority list of Additional Directors/EDOs (DEOs) B-19 Management Cadre as per the well-established rules set out in the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989 Part-VI, Seniority: Rule 17 (1) (a).

The undersigned shall be very grateful and obliged to your goodself for this great gesture and act of administrative justice.


 10/11/2021
 Muhammad Uzair Ali
 (Appellant MC BS-19)
 Additional Director
 Directorate of E&SE Khyber Pakhtunkhwa

Endst: of Even No. & Date

Copy for information to the Honourables:-

1. Chief Secretary, Government of Khyber Pakhtunkhwa.
2. Secretary Establishment, Government of Khyber Pakhtunkhwa.
3. Special Secretary, Elementary & Secondary Department, Government of Khyber Pakhtunkhwa.
4. Additional Secretary Estab. Elementary & Secondary Education, Government of Khyber Pakhtunkhwa.
5. Director Elementary & Secondary Education, Khyber Pakhtunkhwa.
6. Copy for personal Record.

Muhammad Uzair Ali
(Appellant MC BS-19)
Additional Director
Directorate of E&SE, Khyber Pakhtunkhwa

Documents attached.

1. Copy of the previous appeal dated 01/11/2021. Page 4-6.
2. KPPSC letter along with inter-se seniority list to Secretary E&SED vide No.SR1/036824 dated 02/8/2012. Pages 7-8.
3. KPPSC inter-se seniority of DEOs/Additional Directors dated 15/11/2013. Page 9.
4. KPPSC letter to Director vide No. PSC/DR/19/(DR)/2020 Dated 21/07/2020. Page 10.
5. KPPSC inter-se seniority communicated to Director vide the above-mentioned letter. Pages 11 & 12.
6. Recommendations of the KPPSC for appointments/posting of male district education officers/Additional Directors vide No.K.P.K.PSC-SR-VI/32104 Dated 18/06/2010. Pages 13 & 14.
7. Section 8 of the Civil Servants Act, 1973. Pages 15-16
8. Part VI of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989. Page 17.
9. Section Officer (Schools Male) letter to Director vide No. SO(SM)E&SED/1-1/2017/Promotion BS-15 to 20 (MC) Dated Peshawar the May 14, 2018. Page 18.
10. Section Officer (Schools Male) to Director vide No.SO(SM)E&SED/4-25/2018/Seniority of MC Officers BS-19 Dated Peshawar the July 27, 2018. Page 19.
11. Section Officer (Schools Male) letter to Director vide No. SO(SM)E&SED/4-25/2018/Seniority of Abdul Basit Dated Peshawar the January 26, 2016. Page 20.
12. Section Officer (S/F) letter to Director vide No. SO(S/F)E&SED/4-24/2018/Seniority List/BS-18/F/MC Dated Peshawar the July 5th, 2018. Page 21.
13. Section Officer letter to Director vide No. SO(S/F)E&SED/4-24/2018/Seniority List/BS-18/F/MC Dated Peshawar the July 18th, 2018. Page 22.
14. Proposed/Requested KPPSC-based draft seniority of DEOs/Additional Directors. Page 23.



DIRECTORATE OF ELEMENTARY &
SECONDARY EDUCATION

-34-

No. 8076

Dated Peshawar the 10th November 2021

To

The Director,
E&SE, Khyber Pakhtunkhwa.

Subject: TENTATIVE SENIORITY OF DISTRICT EDUCATION OFFICERS/ADDITIONAL DIRECTORS BPS-19
MALE (MANAGEMENT CADRE) AS STOOD ON 12.10.2021

Sir,

Reference the Deputy Director's (Estab.) letter vide No. 7239-82 dated 02/11/2021 addressing all the DEOs/Additional Directors (Male) for perusal of the tentative seniority uploaded by the E&SE Department vide No.SO(SM)E&SE/4-25/2021/Tentative S.List of MC BS-19 dated 02/11/2021, the undersigned in continuation of his previous appeal to Honourable Secretary E&SED, Khyber Pakhtunkhwa with a copy to your goodself vide dated 01/11/2021 resubmits as follows: -

1. That, although, the above cited tentative seniority list is bearing the name of the undersigned along with three other previously missing officers still the same has not been judiciously drafted to allow them the right place and order of seniority in it.
2. That to this extent, the subject Tentative Seniority uploaded on E&SED website is discriminatory, devoid of merit and is diametrically against inter-se seniority determined and conveyed to the Department by Khyber Pakhtunkhwa Public Service Commission (KPPSC) and is therefore illegal and unlawful.
3. That it is discriminatory in that it has drawn artificial, self-imagined and self-formulated distinction between the officers selected on 60% teaching quota and 40% open market quota.
4. That it is devoid of merit in that it has arbitrarily, illegally and unlawfully given preference in seniority to below inter-se merit officers over those high in merit against the inter-se merit/seniority determined and conveyed by the KPPSC vide Nos. SR1/036824 dated 02/8/2012; dated 19/11/2013 and PSC/DR/19/(DR)/2020 Dated 21/07/2020 (see pages 4-9).
5. That the referred uploaded tentative seniority has intentionally omitted the afore-mentioned inter-se merit/seniority of KPPSC for seniority determination of DEOs/Additional Directors by not mentioning the inter-se merit order and score just to hide the actual seniority position, cover up the historic injustice meted out to deserving officers and illegally favour others below inter-se merit officers. See columns 2 & 3 on pages 6, 8 & 9.
6. That to hoodwink the officers selected on open market reserved seats and deprive the undersigned of his due right, the uploaded seniority has purposely been drafted with mala fide intention on recommendations for initial appointment by the KPPSC vide No.K.P.K.PSC-SR-VI/32104 Dated 18/06/2010 which was meant only for appointment/posting of the subject officers (see page 10) and not for determination of their inter-se seniority wherein the Commission clearly mentioned in Para-2 that the "Inter-se Seniority of the recommendees will be sent later and the aerial chronological order does not confer the right of seniority in this regard". See page 11 Para-2.
7. That as mentioned above, time and again, the KPPSC has conveyed the inter-se seniority to the Department but still the uploaded tentative seniority has been drafted diametrically against the same only to indicate ulterior motives behind it.
8. That it is a well-established legal norm that seniority of officers appointed on initial basis on recommendation of the public service commission has to be determined in accordance with the inter-se merit/seniority as determined by the public service commission in accordance with section 8 of the Civil Servants Act, 1973 (see pages 12 & 13) and Part-VI; Seniority, Rule 17 (1) a of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989. See page 14.
9. That the referred tentative seniority has been drafted in violation of the seniority rules set out in the Khyber Pakhtunkhwa Civil Servant Act 1973 and the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 by allowing arbitrary and unlawful preference to below inter-se merit officers selected on departmental 60% quota over those selected on 40% open marked quota.

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10. That despite the crystal-clear fact, that all the top slot BS-19 MC officers including the undersigned were recruited/appointed on initial basis even then their respective inter-se seniority as uploaded has not been drafted in accordance with the established rules of seniority mentioned in Para-6.
11. That the Directorate of E&SE, Khyber Pakhtunkhwa, without taking side with some blue-eyed officers, is duty bound to draft and submit to the Admn. Department the legally correct form/draft of the subject seniority for uploading and further necessary action being custodian of the legally due right of its subordinate officers/officials.
12. That it is worth mentioning that time and again the E&SE Department has directed the Director E&SE to convey updated tentative seniority in accordance with the set rules, policy and inter-se merit but each time he has unfortunately failed to submit the updated tentative seniority legally in its legally correct form. *See pages 15-17.*
13. That the E&SE Department vide its letters Nos.SO(S/F)E&SED/4-24/2018/Seniority List/BS-18/F/MC Dated Peshawar the July 5th, 2018 and SO(S/F)E&SED/4-24/2018/Seniority List/BS-18/F/MC Dated Peshawar the July 18th, 2018 has already clarified to the Directorate that for determination of seniority "administrative department or any other authority has no power to change merit as communicated by Khyber Pakhtunkhwa Public Service Commission. *See pages 18-19.*
14. That it is pertinent to mention that the inter-se seniority of the Deputy District Education Officers (M/F) has already been determined in accordance with the inter-se merit/seniority determined by the KPPSC and not on 60-40 formula (Departmental & Open Market Quotas) ratio for appointment despite the fact that many of them had appealed for seniority to be based on 60-40 % departmental and open market ratio and that these DDEOs (M/F) have been ultimately promoted to BS-19 on basis of the inter-se seniority conveyed by KPPSC.
15. That the addition of this fresh promoted DEOs (based on KPPSC inter-se seniority) into the mainstream of pioneer DEOs has already spawned a new but dialectically awkward creed/blend of equal and unequal in the Management Cadre of the E&SE Department.
16. That if final seniority based on this referred uploaded tentative seniority is determined and notified it will surely deprive the undersigned of his due rights under civil service rules protected under the Constitution of Islamic Republic of Pakistan in which case the appellant reserves constitutional right to knock at the door/s of higher forum/s available under the law for ultimate justice. *See page 20 for KPPSC-based correct version of Seniority of DEOs/Additional Directors.*

Honourable Sir,

As correct merit-based seniority in cases of initial appointments is the basic right of every civil servant upon which depends the whole service career of a civil servant and as the Honourable Competent Authorities are the custodians of the due/fundamental rights of their subordinate civil servants, your goodself is very humbly requested to make necessary correction in the uploaded seniority list and place the name of the undersigned at the right order in the seniority list of Additional Directors/DEOs (DEOs) B-19 Management Cadre as per the well-established rules set out in the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989 Part-VI, Seniority: Rule 17 (1) (a).

The undersigned shall be very grateful and obliged to your goodself for this great gesture and act of administrative justice.

Muhammad Uzair Ali
(Appellant MC BS-19)
Additional Director

Directorate of E&SE Khyber Pakhtunkhwa

Endst: of Even No. & Date.

Copy for information to the Honourables:-

1. Chief Secretary, Government of Khyber Pakhtunkhwa.
2. Secretary Establishment, Government of Khyber Pakhtunkhwa.
3. Additional Secretary Estab. Elementary & Secondary Education, Government of Khyber Pakhtunkhwa.
4. Section Officer (Schools Male), Elementary & Secondary Education, Khyber Pakhtunkhwa.
5. Copy for personal Record.

Muhammad Uzair Ali
(Appellant MC BS-19)
Additional Director

Directorate of E&SE, Khyber Pakhtunkhwa

Documents attached.

1. KPPSC letter along with list of inter-se seniority to Secretary E&SED vide No.SR1/036B24 dated 02/3/2012. Page 4 & 5.
2. KPPSC inter-se seniority of DEOs/Additional Directors dated 19/11/2013. Page 6.
3. KPPSC letter to Director vide No. PSC/DR/19/(DR)/2020 Dated 21/07/2020. Page 7.
4. KPPSC inter-se seniority communicated to Director vide the above-mentioned letter. Pages 8 & 9.
5. Recommendations of the KPPSC for appointments/posting of male district education officers/Additional Directors vide No.K.P.K.PSC-SR-VI/32104 Dated 18/06/2010. Pages 10-11.
6. Section 8 of Civil Servants Act, 1973. Pages 12-13.
7. Part VI of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989. Page 14.
8. Section Officer (Schools Male) letter to Director vide No. SO(SM)E&SED/1-1/2017/Promotion BS-15 to 20 (MC) Dated Peshawar the May 14, 2018. Page 15.
9. Section Officer (Schools Male) to Director vide No.SO(SM)E&SED/4-25/2018/Seniority of MC Officers BS-19 Dated Peshawar the July 27, 2018. Page 16
10. Section Officer (Schools Male) letter to Director vide No. SO(SM)E&SED/4-25/2016/Seniority of Abdul Basit Dated Peshawar the January 26, 2016. Page 17
11. Section Officer (S/F) letter to Director vide No. SO(S/F)E&SED/4-24/2018/Seniority List/BS-18/F/MC Dated Peshawar the July 5th, 2018. Page 18.
12. Section Officer letter to Director vide No. SO(S/F)E&SED/4-24/2018/Seniority List/BS-18/F/MC Dated Peshawar the July 18th, 2018. Page 19.
13. Proposed/Requested KPPSC-based draft seniority of DEOs/Additional Directors. Page 20

DEPARTMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

No.SO(SM)E&SED/1-1/2017/Promotion BS-19 to 20 (MC)
Dated Peshawar the May 14, 2018

-37- "K"

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

Subject:- SENIORITY OF MANAGEMENT CADRE OFFICERS BS-19 IN
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT.

I am directed to refer to the subject cited above and to state that the Competent Authority has expressed grave concern over non-revision of subject seniority list since 2012. I am, therefore, directed to state that draft seniority of Management Cadre Officers (BS-19) of E&SE Department may be prepared and furnished to this office at the most earliest.

Moreover, a certificate regarding below mentioned particulars may also be furnished along with the draft seniority list;

- i. authenticity of date of appointment and length of service of the MC officers.
- ii. non-involvement of any litigation with respect to seniority of the officers
- iii. preparation of the draft seniority list in accordance with the rules/policy in field.

PA/DSB/NT/...
Dy. No. 222
Dated. 15/5/18

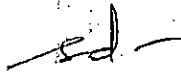

(ANEELA FATIMA)

SECTION OFFICER (SCHOOLS MALE)

Endst: Even No. & Date:

Copy forwarded to the:-

- I. PS to Secretary, E&SE Department Khyber Pakhtunkhwa Peshawar.

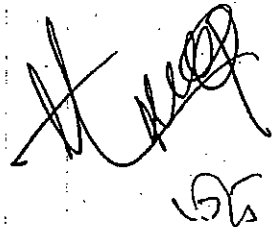


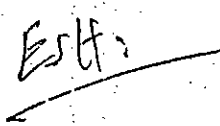
SECTION OFFICER (SCHOOLS MALE)

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GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

-38-

No.SO(SM)E&SED/4-25/2018/Seniority of MC Officers BS-19
Dated Peshawar the July 27, 2018.

To

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

Subject: -

SENIORITY OF MANAGEMENT CADRE OFFICERS BS-19 IN
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

I am directed to refer to this department letter of even No dated 02.07.2018 and to state that the requisite information is still awaited from your side. Whereas, there is stressing demand for finalization of the requisite case.

It is once again requested that the draft seniority list of the officers of Management Cadre BS-19 on the lines mentioned in the said letter may be furnished without any further loss of time.

PA/DDE/ED/11
Dy. No. 1720
Dated. 30-7-18

(Signature)
(MIAN HUSSAIN DIN)
SECTION OFFICER (SCHOOLS MALE)

Endst: Even No. & Date:

Copy of the above is forwarded to the:

1. PS to Secretary, E&SE Department.
2. PS to Special-Secretary, E&SE Department.
3. PA to Additional Secretary (Estab), E&SE Department.

(Signature)
SECTION OFFICER (SCHOOLS MALE)

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GOVERNMENT OF KHYBER PAKHTUNKHWA
 ELEMENTARY & SECONDARY EDUCATION
 DEPARTMENT
 NO.SO(SM)E&SED/4-25/2014/Legal Notice in FSL DEO(MC)
 Dated Peshawar the October 19, 2018

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~~Annexure~~

- 39 -

To

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

Subject: - SENIORITY OF MANAGEMENT CADRE OFFICERS BS-19 IN
 ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

I am directed to refer to your letter No.59/A-88/Management Cadre dated 01-08-2018 on the subject cited above and to request once again, that draft Seniority List of the Officers (BS-19) of Management Cadre may be furnished to this Department for further necessary action without further loss of time.

M. Hussain Din
 (MIAN HUSSAIN DIN)
 SECTION OFFICER (SCHOOLS MALE)

Endst: Even No. & Date:

Copy of the above is forwarded to the:-

1. PS to Secretary E&SE Khyber Pakhtunkhwa, Peshawar.

SECTION OFFICER (SCHOOLS MALE)

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to Comd J. A. I.
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30/10

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30/10/18

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Received on
14/11/18
from
AB PER/Secy
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- 40 -

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

No. SO(S/A)E&SE/D/4-25-2012/ Final Seniority (BS-19)
Dated Peshawar the June 16, 2020.

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

Subject: FILING OF APPEAL FOR RECTIFICATION OF SENIORITY.

I am directed to refer to your letter DATED 24-01-2020 on the subject noted above and to state that whether tentative seniority list of DEOs (BS-19) has been issued or otherwise. If not, then share draft tentatively seniority in respect of said DEOs for further processing of this Department.

Moreover, it may also be apprised when (last time) such tentative or final seniority of these officers was issued or otherwise.



(MUHAMMAD ARIF)
SECTION OFFICER (SCHOOLS MALE)

Encls: Even No. & Date:

- 1. PS to Secretary E&SE Khyber Pakhtunkhwa, Peshawar.



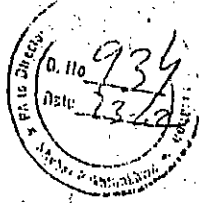
SECTION OFFICER (SCHOOLS MALE)

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GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

No.SO(S/M)E&SED/4-25/2012/Final Seniority (BS-19)

Dated 16.06.2020

To

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

Subject: FILING OF APPEAL FOR RECTIFICATION OF SENIORITY.

1. I am directed to refer to your letter dated 24.01.2020 on the subject noted above and to state that whether tentative seniority list of DEOs(BS-19) has been issued or otherwise if not, then share draft tentatively seniority in respect of said DEOs for further processing of this Department.

2. Moreover, it may also be apprised when (last time) such tentative or final seniority of these officers was issued or otherwise.

(MUHAMMAD ARIF)
SECTION OFFICER (SCHOOLS MALE)



DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR
No. 262 dated 21/10/2021


To,

The Secretary,
Govt. of Khyber Pakhtunkhwa
Elementary and Secondary Education Department.

Subject: TENTATIVE SENIORITY LIST OF DISTRICT EDUCATION
OFFICERS/ADDITIONAL DIRECTORS (MANAGEMENT
CADRE) BPS-19 MALE AS STOOD ON 12/10/2021

Memo:


I am directed to submit "Tentative Seniority list of District
Education Officers/Additional Directors Male BS-19 as it stood on
12/10/2020 for your information and perusal please. It is further requested
to kindly upload the same on the official website www.kpese.gov.pk of
E&SED Department Govt. of Khyber Pakhtunkhwa please.


Deputy Director (Establishment)
Directorate Elementary and Secondary
Education Khyber Pakhtunkhwa Peshawar

Endst No: _____

Copy to the:-

PA Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.


Deputy Director (Establishment)
Directorate Elementary and Secondary
Education Khyber Pakhtunkhwa Peshawar

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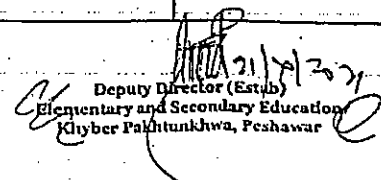
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Relative Seniority list of Officers BPS-19 (District Education Officers/Additional Directors) E&SE Department (Management Cadre) as it stood on 12/10/2021

S. No.	Name of Officer with Designation	Date of Birth	Domicile	Date of 1st appnt: in Edu: Deptt:	Date of Appnt./Promotion as D.E.O/Addl. Dir.	Method of recruitment	Remarks
1	Mr. Muhammad Shaikat, District Education Officer (M) Abbottabad	15-10-62	Manshra	22-08-82	26-06-12	Direct selectee against 60% Departmental Quota	
2	Mr. Haziqur Rehman, District Education Officer (M) Targhar	06-02-62	Karak	01-09-85	24-02-11	-do-	
3	Mr. Jaffar Mansoor Abbasi (awaiting post)	15-09-68	Abbottabad	11-02-99	24-02-11	-do-	
4	Ms. Samina Afsaf District Education Officer (F) Nardan	12-03-65	Haripur	25-03-00	27-01-13	-do-	
5	Mr. Umar Khan, District Education Officer (M) Tank	12-02-62	Tank	01-10-86	24-02-11	Direct selectee against 40% Open Market Quota	
6	Mr. Abdul Salam, District Education Officer (M) Kohat	01-04-62	D.J.Khan.	09-10-85	24-02-11	-do-	
7	Mr. Abdul Basit, Principal GHSS Agra Payan Charsodda	26-06-73	Peshawar	23-01-98	26-06-12	-do-	
8	Mr. Muhammad Uzair Ali Additional Director (P&D)E&SE	08-04-66	Swabi	05-11-95	24-02-11	-do-	
9	Sahibzada Hamid Mahmood, District Education Officer (Male) Peshawar	06-09-65	Peshawar	03-12-89	24-02-11	-do-	

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 Deputy Director (Est,ib)
 Elementary and Secondary Education
 Khyber Pakhtunkhwa, Peshawar



"M" -43 -
OFFICE OF THE
DISTRICT EDUCATION OFFICER (M)
MALAKAND

No: 4766-73 / Seniority (EDOs/DEOs) B-19 Dated Bathkela the 12th June, 2018

Before the Honourable:

1. Chief Secretary,
Government of Khyber Pakhtunkhwa Peshawar.
2. Secretary,
Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
3. Secretary,
Government of Khyber Pakhtunkhwa Establishment and Administration Department Peshawar.

PAI/DEO/ED/18/18
Dy. No. 18/18
Dated: 13/6

Through the:

Director,
Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.

Subject: INCLUSION OF THE NAME OF THE UNDERSIGNED IN THE EDOs/DEOs SENIORITY LIST AND UPDATION OF THE SAME ISSUED VIDE NOTIFICATION NO. SO(S/M)E&SED/4-23/2012/FINAL SENIORITY OF MC B-19 DATED 08/05/2012.

Respect;

2301
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It is submitted in your honour that the undersigned was recruited vide advertisement No.05/2009, 26 EDOs/Addl. Directors through the Khyber Pakhtunkhwa Public Service Commission as Executive District Officer: B5-19 (now District Education Officer) in the Elementary & Secondary Education Department. The seniority released in respect of the mentioned EDOs/DEOs vide Notification No. SO(S/M) E&SED/4-23/2012/final Seniority list of MC B-19 dated 08/05/2012, which was neither actually circulated nor posted/uploaded on the website of the E&SE Department, does not include the name/seniority of the undersigned which renders the same as defective seniority list needing earnestly to be updated. Copy of the defective seniority list is attached herewith as Annexure: "A".

Your gracious honour is, therefore, very humbly prayed to include the name/seniority of the undersigned in the seniority list of EDOs/DEOs as per the inter se seniority determined by the Khyber Pakhtunkhwa Public Service Commission communicated to the Secretary Elementary & Secondary Education Government of Khyber Pakhtunkhwa Peshawar on 02/12/2013 which bears the name/inter se seniority of the undersigned at Serial No.16 in line with the KPK APT Rules, 1989 Part-VI, Seniority, Rule 17 (a). He shall be very grateful and obliged to your goodself for this very kind act and great favour. Copies of the inter se seniority and the mentioned letter are attached herewith as Annexures: "B" & "C".

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DD(M)

12/6/18
(Muhammad Uzair Ali)
District Education Officer (M)
Malakand

Even No. & Date

Advance Copy forwarded for information to the Honourable: -

- 1: Chief Secretary Government of Khyber Pakhtunkhwa Peshawar.
- 2: Secretary Elementary & Secondary Education Department Government of Khyber Pakhtunkhwa Peshawar.
- 3: Secretary Government of Khyber Pakhtunkhwa Establishment & Administration Department Peshawar.
- 4: Secretary Khyber Pakhtunkhwa Public Service Commission Peshawar.
- 5: Personal record.

306
14/6/18

District Education Officer (M)
Malakand

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-44-

To

The Director,
E&SE Khyber Pakhtunkhwa, Peshawar.


Subject: FILING OF APPEAL FOR RECTIFICATION AND INCLUSION OF THE NAMES IN THE SENIORITY LIST OFFICERS OF MANAGEMENT CADRE BS-19 IN THE ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT KHYBER PAKHTUNKHWA.

Kindly refer to the SO (Schools Male) Letter No. SO(S/M)E&SED/4-25/2012/Final Seniority List Of M.C (BS-19) Dated:26 08.2019 on the subject cited above and whereby the Director E&SE has been directed vide Endst: of Even No. & Date: S.No.1 to submit revised seniority list by including names of all the officers at the earliest (Copy of the letter attached herewith).

It is, therefore, your goodself is very humbly requested to kindly revise the mentioned seniority list and include the name of the undersigned in the same as per his inter se merit determined by the Khyber Pakhtunkhwa Public Service Commission in pursuance of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 Part-VI, Rule-17 (1) (a).

The undersigned shall be extremely grateful and obliged to your goodself for this act of great favour and justice.

Thanking in anticipation.

 11/9/19

(Muhammad Uzair Ali)
Additional Director (Estb-II)
Directorate of E&SE PK, Peshawar.

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To
The Honourable Director,
Directorate of E&SE, Khyber Pakhtunkhwa,
Peshawar.

116

Subject: FINALIZATION OF SENIORITY LIST OF ALL CADRES/UPDATION OF SENIORITY LIST ISSUED VIDE NO.SO(S/M)E&SED/4-23/2012/FINAL SENIORITY OF MC B-19 DATED 08/05/2012.

Respect;

Reference E&SED letter vide No.SO(S/F)E&SED/4-24/2021/Seniority list, Dated Peshawar the August 05, 2021 and subsequent reminders vide Even Nos. dated 25-08-2021, 26-08-2021 & September 21, 2021 requesting the Director E&SE for finalization of seniority lists of all cadres (both TC & MC), it is humbly submitted that the undersigned, time and again, through various appeals vide Nos. 4766-73 Dated Batkhela the 12th June, 2018, 11/9/2019 & 4885/F.No. ___/DEO/Add.Directors/Seniority Dated January 24th, 2020, has prayed the concerned authorities for inclusion of his name in the DEOs/Addl. Directors seniority list and updation of the same but so far no tangible action has been taken in this regard.

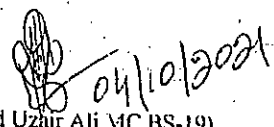
It is worth mentioning that the Seniority List of DEOs has not been revised and updated since 2012 to address the appeals of the undersigned despite clear and specific directions to your goodself from the Admn. Department vide SO(S/M)E&SED/4-25/Final Seniority List of MC (BS-19) Dated 26.08.2019 which is clearly prima facie tantamount to violation Section 8 (5) of the Khyber Pakhtunkhwa Civil Servant Act 1973 clearly providing, "The seniority list prepared shall be revised and notified in the official gazette at least once in a calendar year, preferably in the month of January".

Honourable Sir,

As seniority is the basic right of every civil servant upon which depends the whole service career of a civil servant and as the Honourable Authorities are the custodians of the fundamental rights of their subordinate civil servants, your honour is, therefore, once again very humbly requested for inclusion of the name of the undersigned in the seniority list of Admltinal Directors/EDOs (DEOs) B-19 Management Cadre and issuance of the same for general information as per the well-established rules set in the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989 Part-VI, Seniority: Rule 17 (1) (a).

The undersigned shall be very grateful and obliged to your goodself for this great gesture and act of administrative justice.

DDM-II


04/10/2021

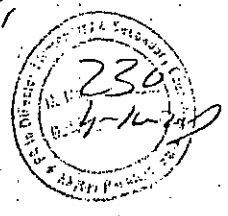
(Muhammad Uzair Ali MC BS-19)
Additional Director
Directorate of E&SE Khyber Pakhtunkhwa,
Peshawar

Copy forwarded for information to the Honourables:-

5-10-2021

1. Secretary, Elementary & Secondary Education Department, Government of Khyber Pakhtunkhwa, Peshawar.
2. Special Secretary, Elementary & Secondary Education Department, Government of Khyber Pakhtunkhwa, Peshawar.
3. Additional Secretary (Establishment), Elementary & Secondary Education Department, Government of Khyber Pakhtunkhwa, Peshawar.
4. PA to Director, Directorate of Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
5. Personal record.

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ADDE (M)

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6-10-4

Applicant
Additional Director
Directorate of E&SE, Khyber Pakhtunkhwa,
Peshawar

"N"

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~~Annexure - F~~

The Section Officer (Schools Male),
Govt. of Khyber Pakhtunkhwa
Elementary and Secondary Education Department.

Subject: REVISED AND UPDATED (FINAL) SENIORITY LIST OF ADDITIONAL DIRECTORS/DISTRICT EDUCATION OFFICER BPS-19 MALE (MANAGEMENT CADRE) AS STOOD ON 12/10/2021 E&SE DEPARTMENT

Memo: I am directed to refer to the subject cited above and to state that this office sent tentative seniority list of Additional Directors/District Education Officers BPS-19 Male (Management Cadre) as stood on 12/10/2021 to your office vide letter No 3002 dated 21/10/2021(Annex-A).

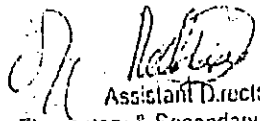
The competent authority approved the tentative seniority list vide letter No.SO(SM)E&SE/4-25/2021/Tentative Seniority List of Management Cadre BS-19 dated 02/11/2021 and uploaded on the official website of E&SE. This office informed all concerned vide this office letter No 7239-82 dated 08.11.2021 (Annex-B).

Directorate of Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar constituted a committee to scrutinize and check the appeals received against the tentative seniority list vide this office Notification No 3852-56 dated 08/12/2021(Annex-C).

The appclate committee checked all appeals and submitted its report to this office (Annex-D & E).This office updated and revised the said seniority list in the light of recommendations of the committee.

It is, therefore, revised and updated (final) seniority list of Additional Directors/District Education Officer BPS-19 Male (Management Cadre) as stood on 12/10/2021 is submitted for approval and further process, with the following detail please.

1. The total sanction posts of Add. Directors/DEOs BPS-19(Management Cadre) in Elementary and Secondary Education Department =40 (Annexure-F)
2. The budget book copies for the current financial year are attached as (Annexure-G)
3. Place of posting of the incumbent already mentioned against each in the instant Seniority List.


Assistant Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Ends No. _____
PA to the Director Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.

6

REVISED AND UPDATED (FINAL) Seniority list of Officers BPS-19 (District Education Officers/Additional Directors) E&SE Department (Management Cadre) as it stood on 12/10/2021

Name of Officer with Designation	Date of Birth	Domicile	Date of 1st apptt: in Edu: Deptt:	Date of Apptt./Prom: as D.E.O./Addl. Dir.	Method of recruitment	Remarks
Muhammad Sheukat, District Education Officer (M) Abbottabad	15-10-82	Manshra	22-08-82	26-06-12	Direct selectee against 00% Departmental Quota	No.SO(SM)E&SED/3-2/2012/Recruitment of EDOs/Add.Direc (BS-19) dated 26.06.2012
Jaffar Mansoor Abbasi (Director DCTE in OPS)	15-09-68	Abbottabad	11-02-99	24-02-11	-do-	No.SO(SM)E&SED/3-2/2011/EDOs/EMC (BS-19) dated 24.02.2011
Ms. Samina Altaf District Education Officer (F) Mardan	12-03-65	Haripur	25-03-01	27-01-13	do	No.SO(S/F)E&SED/3-2/2011/(Female) (BS-19) dated 27.01.2013
Abdul Basit, Principal GISS Agra Payan Charsadda	20-08-71	Peshawar	22-01-98	26-06-12	Direct selectee against 40% Open Market Quota	No.SO(SM)E&SED/3-2/2012/Recruitment of EDOs/Add.Direc (BS-19) dated 26.06.2012
Muhammad Uzair Ali DEO Dir-Lower.	08-04-60	Swabi	05-11-95	24-02-11	-do-	No.SO(SM)E&SED/3-2/2011/EDOs/EMC (BS-19) dated 24.02.2011
Schibazinda Humid Mahmood, Services placed at the disposal of Directorate E&SE.	06-09-65	Peshawar	03-12-89	24-02-11	-do-	No.SO(SM)E&SED/3-2/2011/EDOs/EMC (BS-19) dated 24.02.2011
Sheeraz Ahmed DEO (M) Fatak.	10-03-1970	Swabi	17-02-2000	12.01.2021	By promotion	No.SO(SM)E&SED/3-1/2021/Promotion of BS-19 (Management Cadre) dated 12.01.2021
Iqbal Khan Additional Director Estbb E&SE.	12-05-1972	Peshawar	31-03-1992	12.01.2021	By promotion	No.SO(SM)E&SED/3-1/2021/Promotion of BS-19 (Management Cadre) dated 12.01.2021
Muzaffar Ali Khan DEO (M) Chitral Lower.	01-01-1973	Shangla	05-01-1999	12.01.2021	By promotion	No.SO(SM)E&SED/3-1/2021/Promotion of BS-19 (Management Cadre) dated 12.01.2021
Muhammad Ashraf DEO(M) Dir Upper.	31-03-1971	Haripur	03-07-1997	12.01.2021	By promotion	No.SO(SM)E&SED/3-1/2021/Promotion of BS-19 (Management Cadre) dated 12.01.2021
Hafiz Muhammad Nawaz DEO(M) Haripur.	31-12-1968	Abbottabad	10-07-1999	12.01.2021	By promotion	No.SO(SM)E&SED/3-1/2021/Promotion of BS-19 (Management Cadre) dated 12.01.2021
Muhammad Amin DEO(M) Kohistan Upper.	07-02-1970	Swat	15-01-1998	12.01.2021	By promotion	No.SO(SM)E&SED/3-1/2021/Promotion of BS-19 (Management Cadre) dated 12.01.2021
Muhammad Azam Khan Dy.Managing Director Merged area Education Foundation(MAEF)	15-05-1965	Charsadda	22-01-1991	12.01.2021	By promotion	No.SO(SM)E&SED/3-1/2021/Promotion of BS-19 (Management Cadre) dated 12.01.2021
Musarrat Hussain Khan DEO(M) DI Khan.	25-10-1973	D.I.Khan	05-11-1996	12.01.2021	By promotion	No.SO(SM)E&SED/3-1/2021/Promotion of BS-19 (Management Cadre) dated 12.01.2021
M. Bilal DEO(M) Malakand.	01-04-1972	Charsadda	02-07-1997	12.01.2021	By promotion	No.SO(SM)E&SED/3-1/2021/Promotion of BS-19 (Management Cadre) dated 12.01.2021

Merit score/order of KPSC has not been shown.

BETTER COPY: 47

REVISED AND UPDATED (FINAL) Seniority list of Officers BPS-19 (District Education Officer/Additional Directors) E&SE Department (Management Cadre) as it stood on 12/10/2021.

S.No	Name of Officer with Designation	Date of Birth	Domicile	Date of 1 st Apptt: in Edu, Deptt	Date of Apptt:/ Promotions D.E.O/Addl. Dir.	Method of recruitment	Remarks
1	Muhammad Shaukat, District Education Officer (M) Abbottabad	15.10.62	Mansehra	22.08.82	26.06.2012	Direct Selectee against 60% Departmental Quota	No.SO(SM)E&SED/3-2/2012/Recruitment of EDOs/Add.Dire(BS-19) dated 26.06.2012
2	Jafar Mansoor Abbas (Director DCTT in OPS)	15.09.68	Abottabad	11.02.99	24.02.11	-do-	No.SC(SM)E&SED/3-2/2011/EDOs/EMC(BS-19) DATED 24.02.2011
3	Ms. Samina Altaf, District Education Officer (F) Mardan	12.03.65	Haripur	25.03.00	27.01.13	-do-	No.SO(S/F)E&SED/3-2/2014/(FEMALE)(BS-19) DATED 27.01.2013
4	Abdul Basi, Principle GHSS Agra Payan Charsadda	20.06.73	Peshawar	22.01.98	26.06.12	Direct Selectee against 60% Departmental Quota	No.SO(SM)E&SED/3-2/2012/Recruitment of EDOs/Add.Director(BS-19) dated 26.06.2012
5	Muhammad Uzair Ali, DEO Dir Lower	08.04.60	Swabi	03.11.95	24.02.11	-do-	No.SO(SM)E&SED/3-2/2011/EDOs/EMC(BS-19) DATED-24.02.2011
6	Sahibzada Hamid Mahmood, Services placed at the disposal of Directorate E&SE	06.09.65	Peshawar	03.12.89	24.02.11	-do-	No.SO(SM)E&SED/3-2/2011/EDOs/EMC(BS-19) DATED 24.02.2011
7	Sheraz Ahmad DEO (M) Karrak	10.03.1970	Swabi	17.02.2000	12.01.2021	By Promotion	No.SO(SM)E&SED/3-1/2021/Promotion of BS-19 (Management Cadre) Dated 12.01.2021
8	Iqbal Khan Additional Director Estbb E&SE	12.06.1972	Peshawar	31.03.1992	12.01.2021	By Promotion	No.SO(SM)E&SED/3-1/2021/Promotion of BS-19 (Management Cadre) Dated 12.01.2021
9	Muzaffar Ali Khan DEO (M) Chitral Lower	01.01.1973	Shangla	05.1.1999	12.01.2021	By Promotion	No.SO(SM)E&SED/3-1/2021/Promotion of BS-19 (Management Cadre) Dated 12.01.2021
10	Muhammad Ashraf DEO (M) Dir Upper	31.03.1971	Haripur	03.07.1997	12.01.2021	By Promotion	No.SO(SM)E&SED/3-1/2021/Promotion of BS-19 (Management Cadre) Dated 12.01.2021
11	Hafiz Muhammad Nawaz DEO (M) Haripur	31.12.1968	Abbottabad	10.07.1999	12.01.2021	By Promotion	No.SO(SM)E&SED/3-1/2021/Promotion of BS-19 (Management Cadre) Dated 12.01.2021
12	Muhammad Amin DEO (M) Kohistan Upper	07.02.1970	Swat	15.01.1998	12.01.2021	By Promotion	No.SO(SM)E&SED/3-1/2021/Promotion of BS-19 (Management Cadre) Dated 12.01.2021
13	Muhammad Azam Khan, Dy.Managing Director Merged area Education Foundation (MAEF)	15.05.1965	Charsadda	22.01.1991	12.01.2021	By Promotion	No.SO(SM)E&SED/3-1/2021/Promotion of BS-19 (Management Cadre) Dated 12.01.2021
14	Musarrat Hussain Khan DEO M D.I.Khan	25.10.1973	D.I.Khan	05.11.1996	12.01.2021	By Promotion	No.SO(SM)E&SED/3-1/2021/Promotion of BS-19 (Management Cadre) Dated 12.01.2021
15	Midranullah DEO (M) Malakand	10.03.1970	Charsadda	02.07.1992	12.01.2021	By Promotion	No.SO(SM)E&SED/3-1/2021/Promotion of BS-19 (Management Cadre) Dated 12.01.2021

-84-

5

Scanned with CamScanner

	Name of Officer with Designation	Date of Birth	Domicile	Date of 1st apptt: in Edu: Deptt:	Date of Apptt./Prom : as D.E.O/Addl. Dir.	Method of recruitment	Remarks
16	Muhammad Riaz DEO(M) Swat.	15-04-1974	Malakand	16-05-1994	12.01.2021	By promotion.	No.SO(SM)E&SED/3-1/2021/Promotion of BS-19 (Management Cadre) dated 12.01.2021
17	Sajjad Akhtar Iqbal Additional Director (P&D)E&SE.	03-03-1971	Swabi	01-06-1995	12.01.2021	By promotion	No.SO(SM)E&SED/3-1/2021/Promotion of BS-19 (Management Cadre) dated 12.01.2021
18	Muhammad Sheraz DEO(M) Hangu.	04-01-1975	Karak	22-11-2000	12.01.2021	By promotion	No.SO(SM)E&SED/3-1/2021/Promotion of BS-19 (Management Cadre) dated 12.01.2021
19	Zahid Muhammad Services placed at the disposal of Directorate E&SE.	14-06-1971	Peshawar	11-05-1996	12.01.2021	By promotion	No.SO(SM)E&SED/3-1/2021/Promotion of BS-19 (Management Cadre) dated 12.01.2021

Certificate:

- It is certified that the above seniority list is:
1. Widely Circulated.
 2. Un-disputed/Un-Controversial
 3. No Legislation is pending/involved.

Zu

08/4/22
 Deputy Director (Estab)
 Elementary and Secondary Education
 Khyber Pakhtunkhwa, Peshawar



GOVERNMENT OF
KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

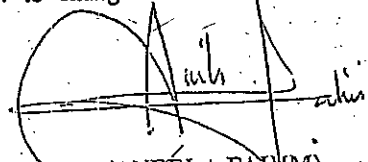
No. SO(S/F)E&SED/4-24/2018/Seniority List/BS-18/F/MC
Dated Peshawar the July 5th, 2018

To

The Director,
E&SE Khyber Pakhtunkhwa,
Peshawar.

SUBJECT: APPEAL FOR CORRECTION IN SENIORITY LIST OF DDEO

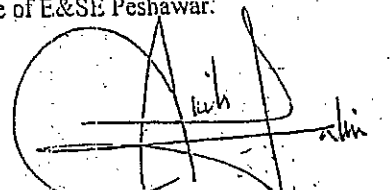
I am directed to refer to appeal of Mst. Naheed Anjum, Deputy Director (BS-18), Directorate of E&SE dated 27-06-2018 on the subject noted above and to intimate that administrative department or any other authority has no powers under any law to change the inter-se-merit as communicated by Khyber Pakhtunkhwa Public Service Commission.


(ANZEELA FAROQ)
SECTION OFFICER (S/F)

Endst: of even No. & Date:

Copy forwarded to the:

1. Mst. Naheed Anjum, Deputy Director (BS-18) Directorate of E&SE Peshawar.
2. PS to Secretary, E&SE Department.
3. PS to Special Secretary, E&SE Department.


SECTION OFFICER (S/F)



GOVERNMENT OF
KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

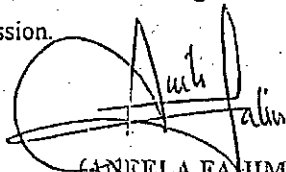
No. SO(S/F)E&SED/4-24/2018/Seniority List/BS-18/F/MC
Dated Peshawar the July 13th, 2018

To ✓

The Director,
E&SE Khyber Pakhtunkhwa,
Peshawar.

SUBJECT: APPEAL FOR CORRECTION IN SENIORITY LIST OF SDEOs

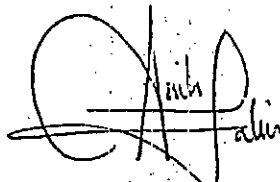
I am directed to refer to appeal of Mst. Nadia Begum (BS-17) SDEO (Female) working as Assistant Director, Directorate of E&SE dated 13-07-2018 regarding the subject matter and to intimate that administrative department or any other authority has no powers under any law to change the inter-se-merit as communicated by Khyber Pakhtunkhwa Public Service Commission.

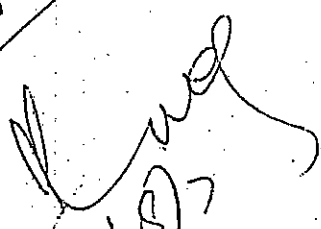

(ANEELA FAHIM)
SECTION OFFICER (S/F)

Endst: of even No. & Date:

Copy forwarded to the:

1. Mst. Nadia Begum (BS-17) SDEO (Female) working as Assistant Director, Directorate of E&SE Peshawar.
2. PS to Secretary, E&SE Department.
3. PS to Special Secretary, E&SE Department.


SECTION OFFICER (S/F)

Handwritten notes:
A100/24

18/7

Handwritten note: NO (P)

مشرق

11/2

عراق کا ایک بارگاہی اخبار

سرکاری اخبار کے طور پر قائم کیا گیا ہے۔ اس کا شمار عراق کے سب سے پریمی اخباروں میں ہوتا ہے۔

ABC CERTIFIED

جاریہ: 4 اگست 2009ء تا 27 اگست 2009ء

سینئر چیف جج کی ہنگامی زخموں کا علاج

کھریو سارٹین کیلئے نرسنگ یونٹ سے سارٹین روپے گھر منتقل کرنا 13 روپے اور منتقلی خرچہ کیلئے روپے ہونے چاہئے گا۔

سرکاری اخبار کے مطابق سینئر چیف جج کی ہنگامی زخموں کا علاج کھریو سارٹین کیلئے نرسنگ یونٹ سے سارٹین روپے گھر منتقل کرنا 13 روپے اور منتقلی خرچہ کیلئے روپے ہونے چاہئے گا۔

سرکاری اخبار کے مطابق سینئر چیف جج کی ہنگامی زخموں کا علاج کھریو سارٹین کیلئے نرسنگ یونٹ سے سارٹین روپے گھر منتقل کرنا 13 روپے اور منتقلی خرچہ کیلئے روپے ہونے چاہئے گا۔

36 ججوں کی تقرری اور تبادلوں

سرکاری اخبار کے مطابق سینئر چیف جج کی ہنگامی زخموں کا علاج کھریو سارٹین کیلئے نرسنگ یونٹ سے سارٹین روپے گھر منتقل کرنا 13 روپے اور منتقلی خرچہ کیلئے روپے ہونے چاہئے گا۔

ریٹائرمنٹ اور ایس ایس سرکاری ملازمین

سرکاری اخبار کے مطابق سینئر چیف جج کی ہنگامی زخموں کا علاج کھریو سارٹین کیلئے نرسنگ یونٹ سے سارٹین روپے گھر منتقل کرنا 13 روپے اور منتقلی خرچہ کیلئے روپے ہونے چاہئے گا۔



امریکی کانگریس نے پاکستان کیلئے

سرکاری اخبار کے مطابق سینئر چیف جج کی ہنگامی زخموں کا علاج کھریو سارٹین کیلئے نرسنگ یونٹ سے سارٹین روپے گھر منتقل کرنا 13 روپے اور منتقلی خرچہ کیلئے روپے ہونے چاہئے گا۔

کے سربراہ کیلئے نرسنگ یونٹ سے سارٹین روپے گھر منتقل کرنا 13 روپے اور منتقلی خرچہ کیلئے روپے ہونے چاہئے گا۔

بہترین بنیادیں حاصل ہیں جن میں بول
 چال کی صلاحیت میں اضافہ کرتا ہے
 لیکن اس کے لیے کہ تمہیں اس کے
 صلاحیت بنانے کے لیے "بے گناہ" کا دل بہت
 آسان ہے۔ اس کے علاوہ اس میں وہاں اس کا

بہترین بنیادیں حاصل ہیں جن میں بول
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 آسان ہے۔ اس کے علاوہ اس میں وہاں اس کا

Positions Available

An organization of international repute seeks to invite applications from qualified individuals to fill the following positions:

Security Managers (02) to be based at Peshawar & Islamabad.

Required Skills:

1. Security background and knowledge desirable
2. Computer literate
3. English and Urdu high standard
4. Experience in both national and international NGOs in a similar capacity.
5. Report writing skills
6. Adaptable and flexible

Proficiency in English language is required. However, for Peshawar based position proficiency in both English and Pashto languages is required.

Interested candidates may please send their latest CV attached with a cover letter clearly mentioning position title and location to: CAO P.O. Box 534, F-7 Mariala Islamabad or at email address: hr@peshawar@gmail.com within one week of the advertisement.

ذات پختہ طبیعت کا پختہ
 انٹرویو اور نوکری کا
 روزگار کے لیے اس کی توجہ
hr@peshawar@gmail.com

N.V.F.R. PUBLIC SERVICE COMMISSION, PESHAWAR

CORRECTION

RESERVE NOTICE INVITATION NO. 2019

ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT PESHAWAR

1. The Allocation for 16 posts of Executive District Officer / Additional Director (DPS-19) at S.No. 2 of Advt. No. 5/2009 may be read as under:

Merit

 - a. Forty per cent (40 posts) for candidates from amongst open market; and
 - b. Sixty per cent (24 posts) for candidates from amongst the teaching cadre.
2. The Allocation for 29 posts of Male District Officer / Deputy Director / Deputy Director Teachers Education and Curriculum (DPS-18) at S.No. 3 of Advt. No. 5/2009 may be read as under:

Merit

 - a. Forty per cent (12 posts) for candidates from amongst open market; and
 - b. Sixty per cent (17 posts) for candidates from amongst the teaching cadre.
3. The Allocation for 24 posts of Female District Officer / Deputy Director / Deputy Director Teachers Education and Curriculum (DPS-18) at S.No. 4 of Advt. No. 5/2009 may be read as under:

Merit

 - a. Forty per cent (10 posts) for candidates from amongst open market; and
 - b. Sixty per cent (14 posts) for candidates from amongst the teaching cadre.
4. The Allocation for 40 posts of Male Deputy District Officer / Assistant Director (DPS-17) at S.No. 5 of Advt. No. 5/2009 may be read as under:

Open Market Posts 40 %

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5	Total
4	3	3	2	2	2	16

Teaching Cadre Posts 60 %

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5	Total
4	4	4	3	3	3	21
5. The Allocation for 30 posts of Female Deputy District Officer / Assistant Director (DPS-17) at S.No. 6 of Advt. No. 5/2009 may be read as under:

Open Market Posts 40 %

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5	Total
3	2	2	2	2	1	12

Teaching Cadre Posts 60 %

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5	Total
5	2	3	3	3	2	18

بہترین بنیادیں حاصل ہیں جن میں بول
 چال کی صلاحیت میں اضافہ کرتا ہے
 لیکن اس کے لیے کہ تمہیں اس کے
 صلاحیت بنانے کے لیے "بے گناہ" کا دل بہت
 آسان ہے۔ اس کے علاوہ اس میں وہاں اس کا

بہترین بنیادیں حاصل ہیں جن میں بول
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 آسان ہے۔ اس کے علاوہ اس میں وہاں اس کا

CAA

مسول ایوی ایشن افسر

بہترین بنیادیں حاصل ہیں جن میں بول
 چال کی صلاحیت میں اضافہ کرتا ہے
 لیکن اس کے لیے کہ تمہیں اس کے
 صلاحیت بنانے کے لیے "بے گناہ" کا دل بہت
 آسان ہے۔ اس کے علاوہ اس میں وہاں اس کا

6. The Eligibility for the 40 posts of Male Deputy District Officers / Assistant Director DPS-17 at S.No. 5 of Advt. No. 5 / 2009 may be read as Male.
 7. The Eligibility for the 30 posts of Female Deputy District Officers / Assistant Director DPS-17 at S.No.6 of Advt. No.5 / 2009 may be read as Female.
- Note:**
1. Separate Application Form Must Be Submitted For Category (A) And (B) Under Each Serial as the case may be.
 2. The closing date shall remain the same i.e., 04.07.2019.

بہترین بنیادیں حاصل ہیں جن میں بول
 چال کی صلاحیت میں اضافہ کرتا ہے
 لیکن اس کے لیے کہ تمہیں اس کے
 صلاحیت بنانے کے لیے "بے گناہ" کا دل بہت
 آسان ہے۔ اس کے علاوہ اس میں وہاں اس کا

possibly completed at least one mega project in Pakistan or abroad.
 post is essential. He/She must be well-versed with Income Tax and Sales Tax

from reputed University of Pakistan or Foreign.
 understanding of Portfolio Management, Prudential Regulations, Capital & Money
 flows procedures & Income Tax Laws.
 posts essential.

(ATTAPUR REHMAN) SECRETARY
 N.V.F.R. Public Service Commission
 PESHAWAR

Also available on www.nvfr.gov.pk INF/11/11

Completion of at least one mega project in Pakistan or abroad. He/She must
 have an experience in Treasury Management experience

بہترین بنیادیں حاصل ہیں جن میں بول
 چال کی صلاحیت میں اضافہ کرتا ہے
 لیکن اس کے لیے کہ تمہیں اس کے
 صلاحیت بنانے کے لیے "بے گناہ" کا دل بہت
 آسان ہے۔ اس کے علاوہ اس میں وہاں اس کا

**N.W.F.P PUBLIC SERVICE COMMISSION, PESHAWAR
CORRIGENDUM
IN RESPECT OF ADVERTISEMENT NO.05/2009
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT PESHAWAR**

1. The Allocation for 26 posts of Executive District Officer/Additional Director (BPS-19) at S.No.1 of Adv: No.5/2009 may be read as under;

Merit.

- a. Forty per cent (10 posts) for candidates from a amongst open market and
b. Sixty percent (15 posts) for candidates from amongst the teaching cadre.
2. The Allocation for 29 posts of Male District Officer/Deputy Director/Deputy Director Teacher Education and Curriculum (BPS-18) at S.No.3 of Adv: No.5/2009 may be read as Under:-

Merit.

- a. Forty per cent (12 posts) for candidates from amongst open market and
b. Sixty percent (17 posts) for candidates from amongst the teaching cadre.
3. The Allocation for 24 posts of Female District Officer/Deputy Director/Deputy Director Teacher Education and Curriculum (BPS-18) at S.No.4 of Adv: No.5/2009 may be read as Under:-

Merit.

- a. Forty per cent (10 posts) for candidates from amongst open market and
b. Sixty percent (14 posts) for candidates from amongst the teaching cadre.
4. The Allocation for 40 posts of Male District Officer/Deputy Director/Deputy Director Teacher Education and Curriculum (BPS-18) at S.No.5 of Adv: No.5/2009 may be read as Under:-

a)- Open Merit 40%.

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone5	Total
4	3	3	2	2	2	16

a)- Teaching Cadre 40%.

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone5	Total
6	4	4	4	3	3	24

5. The Allocation for 30 posts of Female District Officer/Deputy Director/Deputy Director Teacher Education and Curriculum (BPS-18) at S.No.6 of Adv: No.5/2009 may be read as Under:-

a)- Open Merit 40%.

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone5	Total
3	2	2	2	2	3	12

a)- Teaching Cadre 40%.

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone5	Total
5	3	3	3	2	2	18

6. The Eligibility for the 40 posts of Male Deputy District Officers/Assistant Director BPS-17 at S.No.5 of Advt: No. 5/2009 may be read as Male.
7. The Eligibility for the 30 posts of Female Deputy District Officers/Assistant Director BPS-17 at S.No.6 of Advt: No. 5/2009 may be read as Female.

Note: 1:- Separate Application Form Must be Submitted For Category (A) and (B) Under Each Serial as the case may be.

2:- The closing date shall remain the same i.e. 04.07.2009



KHYBERPAKHTUNKHWA PUBLIC SERVICE COMMISSION
 2 Fort Road, Peshawar Cantt, (Near Governor House)
 PH No. 9213563
 9213750, 9214131
 Fax No. 9211795
 No. PSC-/SR-IX 023716

Dated 12/5/16

To

The Secretary to
 Govt of Khyber Pakhtunkhwa
 Elementary & Secondary Education Department

Subject: Inter-se-Merit of Male Deputy District Officer (B-17) Vide Advt: No 05/2009.

Dear Sir,

I am directed to refer to the subject cited above and to enclosed herewith inter-se-merit of Male DDO (B-17) of advertisement No.05/2009 Sr.05 for your record and necessary action please.

Yours Faithfully,

(Signature)
 (Fazal Qayyum)
 Assistant Director - III
 12/5/16

*Reserve to DE for preparing final
 s. list as to hand it to
 es. for approval
 6/11/16
 ASE
 12/5/16*

2770
 124

DS(A)
SoS/MD

Diary No. 3078
 1615

116

Elementary & Secondary
 Education Department
 Peshawar
 B.S. No. 1814
 Date: 16/5/16

Subject: Inter-Se-Merit of Male Deputy District Officer (B-17) Vide Advt: No.05/2009,
In Elementary & Secondary Education Department:

Advertisement No 05/2009.

-54-

Merit Order	Interveiw Marks	D.O.B	Name with father's Name	Domicile/Zone
1.	61/38	31.05.73	Saleem Akhtar S/o Muhammad Ismail Khan	Manshra/5 ✓
2.	59/33	01.01.68	Muhammad Tanveer S/o Faqeer Muhammad	Abbottabad/5 ✓
3.	58/35	03.03.72	Mefahu Din S/o Syed Fazil Mabood Jan	Dir/3 ✓
4.	58/30	10.04.73	Himayat Shah S/o Inayat Shah	Charsadda/2 ✓
5.	56/34	03.03.72	Atiq ur Rehman S/o Amir Jan	Karak/4 ✓
6.	56/31	10.02.71	Mahmood Ghazanvi S/o Amir Mahmood Shah	Chitral/3 ✓
7.	56/30	24.05.64	Mukhtar Ahmed S/o Anwar Khan	Abbottabad/5 ✓
8.	55/33	14.08.72	Abdur Rehman S/o Abdul Kafir	Nowshera/2 ✓
9.	55/32	02.03.67	Hidayat Ullah S/o Akber Khan	Malakand/3 ✓
X 10.	54/31	12.02.76	Bahadar Zeb S/o Alam Zeb	Dir/3 ✓ not found
11.	53/32	25.03.73	Hayat Khan S/o Darwish Khan	Charsadda/2 ✓
X 12.	53/32	25.10.73	Mussarat Hussain Khan s/o Khadim Hussain Khan	D.I.khan/4 ✓ not found
13.	53/31	10.01.70	Muhammad Aurangzeb S/o Ahmad Hussain	Manshra/5 ✓
14.	52/31	20.12.70	Mushtaq Ahmad S/o Gulzar Ahmad	Peshawar/2 ✓
15.	52/31	28.04.74	Abdussamad Jan S/o Sultan Ahmad	Peshawar/2 ✓
X 16.	52/31	06.06.74	Mumtaz Muhammad S/o Badshah Muhammad	Upper Dir/3 ✓ not found
X 17.	52/30	01.03.72	Mohib ur Rehman S/o Muhammad Luqman	N.W.Agy/1 ✓ D-18
18.	52/30	02.11.73	Abdul Malik S/o Muhammad Anwar	Khyber Agy/1 ✓
19.	52/30	20.07.74	Fazle Wahid S/o Fazle Raziq	Charsadda/2 ✓
20.	51/30	15.09.74	Shahjehan S/o Muhammad Hasan	Nowshera/2 ✓
X 21.	51/30	15.04.77	Gul Amin Khan S/o Tan Muhammad	Nowshera/2 ✓ not found
22.	51/30	03.04.78	Syed Tahir Shah S/o Abdul Jalal 30/5/2016 ✓	Nowshera/2 ✓
23.	50/31	02.05.71	Nisar Ahmad S/o Lal Yumir	Karak/4 ✓
24.	50/30	10.05.77	Misri Khan S/o Pasham Gul 30/5/2016 ✓	Peshawar/2 ✓
25.	49/30	20.04.75	Liaqat Ali S/o Gawer Khan	Moh.Agy/1 ✓
26.	48/30	20.02.76	Irfan Ali S/o Gauhar Ali	Charsadda/2 ✓
27.	46/30	04.04.77	Mohammad Ilyas Khan S/o Asil Janan	Karak/4 ✓

Qulch
Assistant 3/5/16

3
Superintendent 1/5/2016

[Signature]
Assistant Director - III
12/5/16

117

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

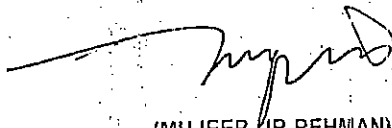
No.SO(S/M) E&SED/3-2/2010/Requisition Vol-III PSC - 55-
Dated Peshawar the May 30, 2016

The Director,
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.

Subject: INTER-SE-MERIT OF MALE Dy. DISTRICT OFFICER BS-17 VIDE ADVT.
NO.05/2009.

Enclosed please find herewith a copy of Khyber Pakhtunkhwa Public Service
Commission letter No.PSC/SR-IX/023716 dated 12-05-2016 alongwith its enclosure on the
subject noted above for further necessary action.

Encl: As Above:



(MUJEEB-UR-REHMAN)
SECTION OFFICER (SCHOOLS/MALE)

Handwritten notes and dates:
d/c.
21/6/16
838
21/5/16
ADD (E) 2
266
1/6
31/5
200

**TENTATIVE SENIORITY LIST OF SUB DIVISIONAL EDUCATION OFFICER/ASSISSTANT DIRECTOR BS-17 (MALE)
MANAGEMENT CADRE OF KHYBER PAKHTUNKHWA AS IT STOOD ON 31.12.2021**

S.#	Name	Father's name	Place of posting	Date of birth	Domicile	Date of Ist. Appnt: in Edc:Deptt	Date of Appnt: on SDEO/AD	Method of Recruit:	BS	Remarks
1	Aamir ur rehman	Mohammad Ilyas Khan	SDEO(M) Mansehra	01-04-1979	Mansehra	08-12-2004	05-09-2018	D/Selectee	17	SO(SM)E&SED/3-2/2016/Recruitment of SDEOs(Male) (BS-17) dt 05/09/2018
2	Luqman Haqim	Mir Afzal Kba	SDEO(M) Takhti Nusrati Karak	15-02-1982	Karak	30-11-2008	05-09-2018	D/Selectee	17	SO(SM)E&SED/3-2/2016/Recruitment of SDEOs(Male) (BS-17) dt 05/09/2018
3	Malak Khan	Shahzad Khan	SDEO(M) Tank	20-04-1973	SWA	24-09-2003	05-09-2018	D/Selectee	17	SO(SM)E&SED/3-2/2016/Recruitment of SDEOs(Male) (BS-17) dt 05/09/2018
4	Shahid Hussain	Mahboob Rehman	SDEO(M) Mustuj Upper Chitral	17-07-1987	Chitral	22-03-2012	05-09-2018	D/Selectee	17	SO(SM)E&SED/3-2/2016/Recruitment of SDEOs(Male) (BS-17) dt 05/09/2018
5	Dilawar Khan	Sarwar Khan	SDEO(M) Lachi Kohat	04-04-1987	NWA	05-09-2018	05-09-2018	D/Selectee	17	SO(SM)E&SED/3-2/2016/Recruitment of SDEOs(Male) (BS-17) dt 05/09/2018
6	Muqaddas Khan	Abdul Halim	SDEO (M) Tor Kbo Mui Kbo Upper Chitral	10-02-1979	Chitral	01-11-2005	05-09-2018	D/Selectee	17	SO(SM)E&SED/3-2/2016/Recruitment of SDEOs(Male) (BS-17) dt 05/09/2018
7	Gul Muhammad	Hamed Muhammad	SDEO (M) Kabul Swat	08-03-1971	Bajour	03-09-2001	05-09-2018	D/Selectee	17	SO(SM)E&SED/3-2/2016/Recruitment of SDEOs(Male) (BS-17) dt 05/09/2018
8	Abdul Hamid	Gul Manoor	SDEO (M) Kohat	17-04-1975	FR Kohat		05-09-2018	D/Selectee	17	SO(SM)E&SED/3-2/2016/Recruitment of SDEOs(Male) (BS-17) dt 05/09/2018
9	Kirat Shah	Mian Zarin Shah	SDEO (M) Dargai Malakand	05-02-1978	Malakand		05-09-2018	D/Selectee	17	SO(SM)E&SED/3-2/2016/Recruitment of SDEOs(Male) (BS-17) dt 05/09/2018
10	Maroof Khan	Maqbool ur rehman	SDEO (M) Lower Tanawal Abbottabad	08-02-1974	Abbottabad		05-09-2018	D/Selectee	17	SO(SM)E&SED/3-2/2016/Recruitment of SDEOs(Male) (BS-17) dt 05/09/2018
11	Naseer Ahmad	Wali Muhammad	SDEO(M) Lora	02-12-1977	Abbottabad	04-05-2005	05-09-2018	D/Selectee	17	SO(SM)E&SED/3-2/2016/Recruitment of SDEOs(Male) (BS-17) dt 05/09/2018
12	Ghulam Habib	Muhammad Wali	SDEO (M) Smar Bagh Dir Lower	05-06-1967	M.Agency	12-07-1989	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
13	Mehboob Ellahi	Rahmat Elahi	SDEO Chitral	15-03-1970	Chitral	04-10-1995	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
14	Muhammad Farooq	Gul Rehman	SDEO(M) Karak	03-02-1976	Karak	05-05-2011	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
15	Abdul Qayum Khan	Haji Lal Khan	SDEO Havelian Abbottabad	08-04-1970	A.Abad	11-01-1995	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
16	Muhammad Zahid Khan	Sher Zaman	Assistant Director	22-11-1973	Nowshera	6/23/1997	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
17	Shamsul Islam Niaz	Niaz Muhammad	SDEO(M) Charsadda	01-01-1978	Charsadda	01-11-2010	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
18	Sharafat Khan	Muhamad Aslam Khan	SDEO (M) Chakaisar Shangla	10-05-1970	A.Abad	05-05-2011	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
19	Mahmood Iqbal	Khairati Khan	SDEO(M) Darband DI Khan	01-12-1967	DI Khan	1/17/1998	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018

S.#	Name	Father's name	Place of posting	Date of birth	Domicile	Date of Ist: Apptt: in Edc:Deptt	Date of Apptt: on SDEO/AD	Method of Recruit:	BS	Remarks
20	Muhammad Irsbad	Niaz Farid	SDEO(M) Bannu	16-04-1976	FR.Bannu	1/31/2002	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
21	Muhammad Anwar	Hazrat Umar	SDEO (M) Mardan	01-03-1973	Mardan	6/24/1997	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
22	Zia ullah	Zikriya Khan	SDEO (M) Town-I Peshawar	19-03-1970 6	Peshawar	5/28/1994	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
23	Shams Ur Rehman	Malik ur Rehman	SDEO(M) Balakot Manshera	15-11-1974	Mansehra	1/20/1996	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
24	Iftikhar Ahmad	Mumtaz ahmad	SDEO (M) Ghaz. Haripur	25-12-1969 7	A.Abad	05-08-1993	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
25	Ghulam Sarwar	Ghulam yabya	SDEO Batkhela Malakand	21-05-1972	MKD	02-11-1993	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
26	Muhammad Zubair	Sabz Ali Shah	Working as Dy.DEO Charsadda	19-07-1972	Charsadda	1/22/1998	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
27	Fazli Khuda	Waris Khan	SDEO (M) katlang Mardan	06-01-1976	Mardan	3/24/2003	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
28	Muhammad Rehman Shah	Gul Rehman Shah	SDEO(M) Bakakhel Bannu	23-02-1976	Bannu	05-05-2011	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
29	Muhammad Sohail Khan	Mir Jafar Khan	SDEO (M) Jehangira Nowshera	22-03-1971	Nowshera	10/31/1996	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
30	Ali Heidar	Zahid Khan	SDEO(M) Munda Dir Lower	05-01-1962	Dir	11/19/1986	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
31	Muharrad Raza Shah	Muhammad Hanif	SDEO (M) Adenzai Dir Lower	18-12-1963 8	Dir	05-11-1983	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
32	Muhammad Islam	Fatihul Mulk khan	SDEO(M) Timergera Dir Lower	10-04-1973	Dir	12/20/1994	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
33	Dil Nawaz Khan	Dashat Mir	SDEO(M) BD Shah Karak	03-01-1977	Karak	08-01-2006	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
34	Fida Muhammad	Firdos khan	SDEO (M) Town-III Peshawar	15-04-1977	Swabi	4/20/1999	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
35	Muhammad Aftab	Masal khan	SDEO (M) Town-II Peshawar	14-04-1978	Nowshera	6/23/1997	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
36	Hayat khan	Nazeef khan	Assistant Director (Lit-II)	15-02-1979	Charsadda	5/17/2011	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
37	Muhammad Ajmal	Jamalud Din	SDEO(M) Ogi Mansehra	02-01-1969 9	Mansehra	2/28/1993	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
38	Sahib Muhammad	Shad Muhammad	SDEO(M) Mandan Bunir	01-01-1967 10	Swabi	12-09-1989	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
39	Waheed Ullah Shah	Mazhar Ali Shah	SDEO(M) Kakki Bannu	16-01-1968 11	Bannu	3/31/1992	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
40	Khalid Naseem	Malik Muhammad Amir	SDEO(M) Prwa Dikhan	28-02-1976	D I Khan	4/21/1999	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
41	Gul Faraz	Shahid Khan	DY DEO Tank in OPS	05-03-1970 12	Karak	10-08-1990	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018

-58-

S.#	Name	Father's name	Place of posting	Date of birth	Domicile	Date of Ist: Apptt: in Edc:Deptt	Date of Apptt: on SDEO/AD	Method of Recruit:	BS	Remarks
42	Abdur Rehman Rashid	Inayat Ullah Jan	SDEO(M) Serai Norang Laki Marwat	11-01-1971 /3	L.Marwat	08-03-1999	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
43	Abdul wahab	Abdul Ghafoor	SDEO Topi Swabi	06-03-1971 /4	Swabi	12/31/1993	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
44	Imtiaz Khan	Taj Barin	SDEO(M) Dir Upper	08-02-1973	Nowshera	5/30/1995	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
45	Hameed Ullah	Khan Zaman	AD(DDU) Directorate	12-04-1974	L.Marwat	09-01-2004	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
46	Muhammad Abid	Fazli Khaliq	SDEO Razar Swabi	01-11-1974	Swabi	4/24/1998	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
47	Muhammad Azam	Badashah Islam	AD (General) Directorate	27-12-1974	MKD	05-05-2011	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
48	Raees Khan	Johar Gul	SDEO(M) Daggar Buner	06-09-1976	Khy: Agency:	9/21/1998	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
49	Adil Muhammad	Ghani Muhammad	SDEO(M) Khado Kiel Buner	03-04-1979	Swabi	05-07-2011	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
50	Shah Jehan Khan	H.Aslam Khan	Assistant Director	15-03-1979	Peshawar	05-05-2011	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
51	Love Dan	Amin Jan	SDEO(M) Lal Qila Lower Dir	02-04-1972	Baj Agy:	4/19/1995	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
52	Amir Badashah	Tamash Gul	Assistant Director(Estb-I)	15-04-1973	Mardan	05-05-2011	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
53	Muhammad Hamayun	Salam Gul	SDEO(M) Darban Dikhan	02-02-1973	Karak	10-12-1995	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
54	Niaz Wali Khan	Muhammad Yousaf	SDEO(M) Puran Shangla	05-03-1971 /5	Swabi	9/21/1997	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
55	Muhammad Saleem	Abdul Halim	SDEO(M) Pabbi Nowshera	25-04-1972	Nowshera	12-07-1992	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
56	Shafiq Ur Rehman	Abdur Rehman	SDEO(M) Darband Mansehra	12-04-1973	Mansehra	1/31/1995	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
57	Ahmad Ullah	Nasrullah	SDEO (M) Shabqadar Charsada	17-08-1974	Charsada	7/13/1997	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
58	Raees Ur Rehman	Noor Ur Rehman	SDEO Judba Torghar	13-02-1966	Mansehra	3/15/1986	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
59	Muhammad Zarif	Nawaz Ali	SDEO(M) DIKhan	25-07-1969	DI Khan	5/26/1997	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
60	Muhammad Tariq	Noor Ali Khan	SDEO Tall Hangu	28-03-1971	Bannu	05-05-1999	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
61	Hamid Rasool	Abdur Rasool	Assistant Director(Lit-I)	02-06-1974	Bannu	09-01-2006	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
62	Qadir Shah	Sahib Khan	SDEO(M) Laki Marwat	03-01-1974	L.Marwat	05-10-2005	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
63	Muhammad Arshad	Wadood Ur Rehman	Assistant Director(IMU)	22-01-1974	Peshawar	8/16/1997	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018

-59-

S.#	Name	Father's name	Place of posting	Date of birth	Domicile	Date of Ist. Apptt: in Edc:Deptt	Date of Apptt: on SDEO/AD	Method of Recruit:	BS	Remarks
64	Irshad Khan	Khushal Khan	SDEO(M) Town-IV Peshawar	14-03-1974	Peshawar	5/15/1999	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
65	Syed Atta Ullah Shah	S.Ayed Muzarab Shah	Assistant Director(P&D)	01-02-1976	Mohd Ay:	05-05-2011	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
66	Shahzad Nadcem	Khurshood Ahmad	SDEO Darosh Chitral	01-02-1977	Chitral	05-05-2011	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
67	Habib Ur Rehman	Badashah Khan	SDEO (M) Hangu	05-09-1964	L.Marwat	12/16/1990	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
68	Abdul Samad	Muhammad Miskeen	SDEO Bafa Mansehra	01-01-1970	Mansehra	12/19/1990	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
69	Chanzeb	Zardad Khan	SDEO Alai batgram	25-05-1972	Abbott Abad	05-05-2011	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
70	Raja Babu Jahangir	Raja Sultan Mubarak	SDEO (M) Abbottabad	01-04-1973	Mansehra	05-05-2011	26-09-2018	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 26/09/2018
71	Qaisar Khan	Muhammad Nawaz Khan	DY.DEO Kohat in OPS	16-04-1974	FR. Bannu	4/20/1999	21-02-2019	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 21/02/2019
72	Sharaf Uddin	Gul Nadar Khan	AD Directorate E&SE	20-02-1968	Chitral	03-01-1991	21-02-2019	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 21/02/2019
73	Imtiaz Khan	Gul Zaman Khan	SDEO (Male) Nowshera	08-04-1968	Dir.	5/16/1987	21-02-2019	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 21/02/2019
74	Muhammad Khitab	Gulab	SDEO (Male) Wari Dir(U)	01-01-1969	Dir	12-10-1990	21-02-2019	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 21/02/2019
75	Balcht Zada	Mahan Gul	SDEO (Male) Ilambhat Dir (L)	10-04-1970	Dir	4/25/1992	21-02-2019	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 21/02/2019
76	Zia ur Rehman	Said Rehman	AD Directorate E&SE	15-09-1972	Peshawar	01-01-1994	21-02-2019	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 21/02/2019
77	Ihtisham ul Haq	Fazal Haq	SDEO (Male) Kalkot Dir(U)	01-01-1973	MKD	05-04-1999	21-02-2019	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 21/02/2019
78	Abdul Hafiz	Abdur Rashid	SDEO (Male) Kolachi DI Khan	08-03-1974	DI Khan	03-01-1993	21-02-2019	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 21/02/2019
79	Ishtiaq Ahmad Khan	M.Akram Khan	SDEO (Male) Haripur	14-05-1968	Abbott Abad	11-06-1987	04-09-2019	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 4/09/2019
80	Mati Ullah Khan	Darwaiz Khan	AD Directorate	03-04-1978	FR. Bannu	18-04-2009	04-09-2019	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 4/09/2019
81	Shahbir Ahmad	Fazle Hanan	SDEO (Male) Rustam Mardan	30-04-1973	Charsada	23-02-1998	04-09-2019	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 4/09/2019
82	Jamsheed Khan	Mehmood Khan	SDEO (Male) Lahore Swabi	01-01-1977	Swabi	11-01-2000	04-09-2019	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 4/09/2019
83	Riaz Khan	Mir Zale Khan	Working as Dy.DEO Bannu	08-03-1972	Bannu	23-04-1996	04-09-2019	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 4/09/2019
84	Rajab Ali	Mir Qadam Khan	SDEO (M) Domail Bannu	15-04-1970	SW Agy:	31-10-1994	04-09-2019	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 4/09/2019
85	M.Tahir	Habib Jan	SDEO (Male) Khali Dir Lower	14-05-1972	Dir	31-08-1994	04-09-2019	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 4/09/2019

S.#	Name	Father's name	Place of posting	Date of birth	Domicile	Date of Ist: Apptt: in Edc:Deptt	Date of Apptt: on SDEO/AD	Method of Recruit	BS	Remarks
86	Farman Ullah	Aman Ullah	AD Directorate E&SE (B&T)	01-01-1975	Peshawar		04-09-2019	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 4/09/2019
87	Syed Ikram	Mutamed Khan	SDEO (Male) Takhtbai Mardan	15-03-1975	Mardan	24-06-1997	04-09-2019	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 4/09/2019
88	M.Azam Khan	Gul Khan	AD Directorate E&SE	18-07-1977	FR.Bannu		04-09-2019	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 4/09/2019
89	Saeed Mehmood	Hazrat Mehmood	SDEO (Male) Gagra Buner.	07-01-1967	Bunir	01-06-1996	04-09-2019	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 4/09/2019
90	Fazle Qadir	Ali Asghar	SDEO (Male) Khanpur Haripur.	10-04-1967	Haripur	17-09-1986	04-09-2019	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 4/09/2019
91	Aurang Zeb	Paidad Khan	SDEO (Male) Bisham Shangla	10-04-1969	Shangla	04-04-1990	04-09-2019	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 4/09/2019
92	Asad Ullah Shah	Nawab Ali Shah	SDEO (M) Miryan Bannu	07-09-1969	Bannu	01-09-1994	04-09-2019	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 4/09/2019
93	Farman Ullah	Afsar Khan	SDEO (Male) Swabi.	20-02-1971	Swabi		04-09-2019	By Promotion	17	NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17) dt 4/09/2019
94	Altaf Hussain	Nasrullah Khan	SDEO Kabal Swat	07-04-1970	Malakand	13-04-1996	04-02-2021	By promotion	17	NO.SO(PE)E&SED/2-6/DPC Meeting/2020 dt 4/02/2021
95	Muhammad Alam Din	Muhammad Iqbal Din	SDEO Hangu	05-04-1971	FR.Bannu	26.5.1999	04-02-2021	By promotion	17	NO.SO(PE)E&SED/2-6/DPC Meeting/2020 dt 4/02/2021
96	Saleh Badshah	Lal Badshah	Assistant Director	01-09-1971	Lakki Marwat	23.04.1996	04-02-2021	By promotion	17	NO.SO(PE)E&SED/2-6/DPC Meeting/2020 dt 4/02/2021
97	Akbar Ghani	Fateh Muhammad	SDEO Barawal Bandi Dir Upper	07-05-1972	Dir Lower	17.03.1992	04-02-2021	By promotion	17	NO.SO(PE)E&SED/2-6/DPC Meeting/2020 dt 4/02/2021
98	Muhammad Azeem Khan	Nawab Khan	Assistant Director	03-03-1973	NWA	16.06.2004	04-02-2021	By promotion	17	NO.SO(PE)E&SED/2-6/DPC Meeting/2020 dt 4/02/2021
99	Sikandar Hayat	Sadiqullah	SDEO (M) Tangi Charsadda	20-Nov-73	Swabi	01.09.1992	28-10-2021	By promotion	17	SO(PE)2-6/DPC Meeting/ASDEOs(M)/2021 dated 28/10/2021
100	Muhammad Neor Sultan	Dilawar Khan	SDEO (M) Bettani Lakki Marwat	22/02/1976	D.I. Khan	01.04.1999	28-10-2021	By promotion	17	SO(PE)2-6/DPC Meeting/ASDEOs(M)/2021 dated 28/10/2021
101	Wisal Muhammad	Dost Muhammad	SDEO (M) Garhi Kapura Mardan	11/08/1979	Charsadda	10.05.2011	28-10-2021	By promotion	17	SO(PE)2-6/DPC Meeting/ASDEOs(M)/2021 dated 28/10/2021
102	Nisar Ahmad	Painda Gul	SDEO (M) Kalkot Dir Upper	01.04.1964	01/04/1964	15.10.1992	28-10-2021	By promotion	17	SO(PE)2-6/DPC Meeting/ASDEOs(M)/2021 dated 28/10/2021
103	Muhammad Iqbal	Baz Mula	SDEO (M) Sheringal Dir Upper	20/11/1964	Dir Upper	27.09.1989	28-10-2021	By promotion	17	SO(PE)2-6/DPC Meeting/ASDEOs(M)/2021 dated 28/10/2021
104	Zaheerur Din	Muhammad Saeed	SDEO (M) Khar TD Bajaur	02/03/1965	Dir Lower	13.07.1999	28-10-2021	By promotion	17	SO(PE)2-6/DPC Meeting/ASDEOs(M)/2021 dated 28/10/2021
105	Habibullah	Aslam Khan	SDEO (M) Darban DI-Khan	20/2/1974	Tank	01.04.1993	28-10-2021	By promotion	17	SO(PE)2-6/DPC Meeting/ASDEOs(M)/2021 dated 28/10/2021
106	Hafiz Fazle Akbar	Gohar	SDEO (M) Razarh Swabi	05.04.1978	Swabi	21.01.1997	28-10-2021	By promotion	17	SO(PE)2-6/DPC Meeting/ASDEOs(M)/2021 dated 28/10/2021
107	Mir Samad Khan	Hakeem Khan	SDEO (M) Battagram	12/05/1971	Battagram	22.11.1994	28-10-2021	By promotion	17	SO(PE)2-6/DPC Meeting/ASDEOs(M)/2021 dated 28/10/2021

-61-

S.#	Name	Father's name	Place of posting	Date of birth	Domicile	Date of Ist: Apptt: in Ede:Deptt	Date of Apptt: on SDEO/AD	Method of Recruit:	BS	Remarks
108	Muhammad Ishtiaq	Muhammad Latif	SDEO(M) Sub Division Hassan Khel Peshawar	29/09/1975	Peshawar	06.05.1996	28-10-2021	By promotion	17	SO(PE)2-6/DPC Meeting/ASDEOs(M)/2021 dated 28/10/2021
109	Muhammad Naeem	Mumtaz Khan	SDEO (M) Takht-e-Nusrati Karak	25/05/1976	Karak	06.05.2011	28-10-2021	By promotion	17	SO(PE)2-6/DPC Meeting/ASDEOs(M)/2021 dated 28/10/2021
110	Syed Anwar Ali Shah	Syed Mehmood Shah	Assistant Director (Estab-I) Directorate of	20/11/1971	Mohmand Agency	15.05.2011	28-10-2021	By promotion	17	SO(PE)2-6/DPC Meeting/ASDEOs(M)/2021 dated 28/10/2021
111	Muhammad Sharif	Sher Khan	SDEO(M) Lower Kuram	01/03/1970	Kurram Agency	03.12.1994	28-10-2021	By promotion	17	SO(PE)2-6/DPC Meeting/ASDEOs(M)/2021 dated 28/10/2021
112	Abdul Qayum Khan	Abdul Hanan	SDEO(M) Miran Shah NW	23/06/1978	Bannu	01.11.2005	28-10-2021	By promotion	17	SO(PE)2-6/DPC Meeting/ASDEOs(M)/2021 dated 28/10/2021
113	Ihsan Ullah	Amer Sher	SDEO(M) Landi Kotal Khyber	14/08/1971	Mohmand Agency	17.01.1995	28-10-2021	By promotion	17	SO(PE)2-6/DPC Meeting/ASDEOs(M)/2021 dated 28/10/2021
114	Habibullah	Muhammad Iqbal	SDEO(M) Jamrud Khyber	10/12/1973	Peshawar	26.05.1994	28-10-2021	By promotion	17	SO(PE)2-6/DPC Meeting/ASDEOs(M)/2021 dated 28/10/2021
115	Muhammad Hayat Khan	Masal Khan	SDEO(M) Bara Khyber	14/04/1975	Nowshera	23.06.1997	28-10-2021	By promotion	17	SO(PE)2-6/DPC Meeting/ASDEOs(M)/2021 dated 28/10/2021
116	Sultan Muhammad	Ali Akbar	SDEO(M) Oikozai	01/04/1973	Mardan	29.04.1997	28-10-2021	By promotion	17	SO(PE)2-6/DPC Meeting/ASDEOs(M)/2021 dated 28/10/2021
117	Muhammad Ishaq	Muhammad	SDEO(M) Charbagh Swat	16/03/1971	Malakand	27.10.1994	28-10-2021	By promotion	17	SO(PE)2-6/DPC Meeting/ASDEOs(M)/2021 dated 28/10/2021
118	Fayaz Uddin	Jehan Badshah	SDEO(M) Lal Killa Dir Upper	14/03/1979	Dir Lower	05.05.2011	28-10-2021	By promotion	17	SO(PE)2-6/DPC Meeting/ASDEOs(M)/2021 dated 28/10/2021

Deputy Director(Est)
Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar



KHYBERPAKHTUNKHWA PUBLIC SERVICE COMMISSION
2 Fort Road, Peshawar, Cantt, (Near Governor House)

PH No. 9213563

9213750, 9214131

Fax No. 9211795

No. PSC-SR-IX

020262

Dated 07/5/16

- 62 -

To

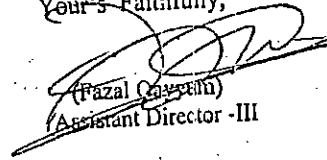
The Secretary to
Govt of Khyber Pakhtunkhwa
Elementary & Secondary Education Department

Subject: Inter-se-Merit of Male District Officer (B-18) Vide Advt. No 05/2009.

Dear Sir,

I directed to refer to the subject cited above and to forward herewith inter-se-merit Male DO (B-18) for your record and necessary action please.

Yours Faithfully,


(Fazal Chaudhry)
Assistant Director - III

Handwritten notes:
ASW
12/5/2016
DSE for M/B P1
D S(A) Que 10/5/2006
30(SIM)
12/5/16

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2995
12/5/16

1735
MS

**Inter-Se-Merit of Male District Officer (B-18) Vide Advt. No 05/2009.
In Elementary & Secondary Education Department;**

Advertisement No 05/2009.

-63-

Serial Order	Interview Marks	D.O.B	Name with father's Name	Domicile /Zone
1.	67/45	10.03.71	Sheraz Ahmad S/o Nisar Muhammad	Swabi/2
2.	65/36	04.01.66	Mir Alam Said S/o Ajab Khan	Moh: Agy/1
3.	59/31	12.06.72	Iqbal S/o Faqir Muhammad	Peshawar/2
4.	58/36	01.01.73	Muazaffar Ali Khan S/o Muhammad Pur Sand	Shangla/3
5.	58/35	19.10.69	Zulfiqar Ul Mulk S/o Ehsan ud Din	Nowshera/2
6.	57/35	31.03.71	Muhammad Ashraf S/o Sher Ahmad	Haripur/5
7.	57/30	31.12.68	Hafiz Mohammad Nawaz S/o Aziz ur Rehman	Abbottabad/5
8.	56/33	07.02.70	Muhammad Amin S/o Said Nawab	Swat/3
9.	55/30	10.07.66	Yousaf Khan S/o Saif Ul Malook	Swat/3
10.	55/30	10.05.69	Sajjad Akhtar S/o Muhammad Ismail	Manshera/5
11.	54/32	15.05.65	Muhammad Azam Khan S/O Mian Fazli Rabbi	Charsadda/2
12.	54/30	14.06.64	Tahir Javed S/o Abdul Jalil Khan	Abbottabad/5
13.	52/33	25.10.73	Musarrat Hussain Khan S/o Khadim Hussain Khan	D.I Khan/4
14.	52/32	01.04.72	Midrar Ullah S/o Moulvi Harid Ullah Jan	Charsadda/2
15.	52/30	15.03.68	Imtiaz Ali S/o Allah Dad	Haripur/5
16.	52/30	22.11.70	Mohammad Bilal S/o Muhammad Zahoor	Peshawar/2
17.	52/30	15.04.74	Muhammad Riaz S/o Muhammad Saeed	Malakand Agy/3
18.	51/32	03.03.71	Sajjad Akhtar Iqbal S/o Muhammad Iqbal	Swabi/2
19.	51/32	06.01.77	Muhammad Idress S/o Rustam Khan	Swati/2
20.	51/30	14.04.72	Aqal Bad Shah S/o Mehrab Shah	Ork Agy/1
21.	50/30	11.01.65	Muhammad Mehdi Shah S/o Ikram Ullah	Charsadda/2
22.	50/30	20.04.71	Zahid Hussain S/o Muzaflar Khan	Abbottabad/5
23.	48/31	04.01.75	Muhammad Sheraz S/o Naseeb Gul	Karak/4
24.	48/30	23.12.64	Umar Zaman S/o Muhammad Suleman	UDA Manshera/3
25.	47/30	01.08.66	Shah E Mulk S/o Muhammad Ismail	Charsadda/2
26.	47/30	06.05.68	Muhammad Ashfaq Khan S/o Mohammad Hussain Khan	Abbottabad/5
27.	47/30	14.06.71	Zahid Muhammad S/o Sher Muhammad	Peshawar/2
28.	47/30	20.04.78	Ifikhar Ul Ghani S/o Ghani ur Rehman	Swabi/2
29.	46/30	01.03.68	Zahoor Khan S/o Abdul Qayyum Khan	Peshawar/2

Quila
Assistant 3/5/16

Superintendent 4/5/16

Assistant Director III

121



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

No. SO(S/M) E&SED/3-2/2010/Requisition Vol-III PSC
Dated Peshawar the May 23, 2016

-64-

To :

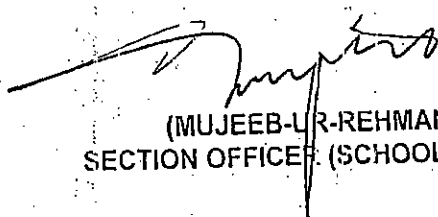
The Director,
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.

ADDE
24/5/2016

Subject: - INTER-SE-MERIT OF MALE DISTRICT OFFICER BS-18 VIDE ADVT. NO.05/2009.

Enclosed please find herewith a copy of Khyber Pakhtunkhwa Public Service Commission letter No.PSC/SR-IX/020262 dated 10-05-2016 alongwith tis enclosure on the subject noted above for further necessary action..

Encl: As Above:


(MUJEEB-UR-REHMAN)
SECTION OFFICER (SCHOOLS/MALE)

408

0/18
22/5/16

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Tentative Seniority List of Deputy District Education Officers /Deputy Directors Management Cadre BPS-18 Male E&SED, Khyber Pakhtunkhwa as it stood on 31/12/2021

S.#	Name of Officers	D/O Birth	Domicile	Date of 1st Entry in Edu; Deputy	Present Post date	BPS	Method of Recruit	Designation/Place of Posting	Remarks
1	Sheraz Ahmed S/O Nisar Muhammad	10-03-1970	Swabi	17-02-2000	15-04-2014	18	Direct Selectee	DEO (M) Karak B-19, working on acting charge base vide Notification No SO(SM)E & SED/3-2/2019/ Promotion B-18 to B-19 (MC) dt 27/05/2019	No.SO(S/M)E&SED/3-2/2013/recruitment of DDEO (BPS-18) (MaleC) dated 15-04-2014
2	Iqbal Khan S/O Faqir Muhammad	12-06-1972	Peshawar	31-03-1992	15-04-2014	18	Direct Selectee	Additional Director, Directorate of E & SE B-19, working on acting charge base vide Notification No SO(SM)E & SED/3-2/2019/ Promotion B-18 to B-19 (MC) dt 27/05/2019	No.SO(S/M)E&SED/3-2/2013/recruitment of DDEO (BPS-18) (MaleC) dated 15-04-2014
3	Muzaffar Ali Khan S/O Muhammad Pur Sand	01-01-1973	Shangla	05-04-1999	15-04-2014	18	Direct Selectee	DEO (M) Lower Chatral B-19, working on acting charge base vide Notification No SO(SM)E & SED/3-2/2019/ Promotion B-18 to B-19 (MC) dt 27/05/2019	No.SO(S/M)E&SED/3-2/2013/recruitment of DDEO (BPS-18) (MaleC) dated 15-04-2014
4	Zulfqar ul Mulik S/O Ihsanud Din	19-10-1969	Nowshera	16/10/189	15-04-2014	18	Direct Selectee	DEO (M) Upper Chatral B-19, working on acting charge base vide Notification No SO(SM)E & SED/3-2/2019/ Promotion B-18 to B-19 (MC) dt 27/05/2019	No.SO(S/M)E&SED/3-2/2013/recruitment of DDEO (BPS-18) (MaleC) dated 15-04-2014
5	Muhammad Ashraf S/O Sher Ahmad	31-03-1971	Haripur	03-07-1997	15-04-2014	18	Direct Selectee	DEO (M) B-19, working on acting charge base vide Notification No SO(SM)E & SED/3-2/2019/ Promotion B-18 to B-19 (MC) dt 27/05/2019, but his Services placed at the disposal of Directorate of E&SE KPK vide Notification SO(S/M)E&SED/3-3/2021/promotion BS 18 to BS-19 dated 21/4/2021	No.SO(S/M)E&SED/3-2/2013/recruitment of DDEO (BPS-18) (MaleC) dated 15/04/2014
6	Hafiz Muhammad Nawaz S/O Azizur Rehman	31-12-1968	Abbottabad	10-07-1999	15-04-2014	18	Direct Selectee	DEO (M) Lower Kohistan B-19, working on acting charge base vide Notification No SO(SM)E & SED/3-2/2019/ Promotion B-18 to B-19 (MC) dt 27/05/2019	No.SO(S/M)E&SED/3-2/2013/recruitment of DDEO (BPS-18) (MaleC) dated 15-04-2014
7	Muhammad Amin S/O Said Nawab	07-02-1970	Swat	15-01-1998	15-04-2014	18	Direct Selectee	DEO (M) Upper Kohistan BS-19 working on acting charge base vide Notification No SO(SM)E & SED/3-2/2019/ Promotion B-18 to B-19 (MC) dt 27/05/2019	No.SO(S/M)E&SED/3-2/2013/recruitment of DDEO (BPS-18) (MaleC) dated 15-04-2014
8	Muhammad Azam Khan S/O Mian Fazli Rabbi	15-05-1965	Charsadda	22-01-1991	15-04-2014	18	Direct Selectee	Dy. Managing Director Merged area Education foundation(MAEP) BS-19 working on acting charge base vide Notification No SO(SM)E & SED/3-2/2019/ Promotion B-18 to B-19 (MC) dt 27/05/2019	No.SO(S/M)E&SED/3-2/2013/recruitment of DDEO (BPS-18) (MaleC) dated 15-04-2014

S.#	Name of Officers	D/O Birth	Domicile	Date of 1st; Entry in Edu; Deptt;	Present Post date	BPS	Method of Recriut:	Designation/Place of Posting	Remarks
9	Musarrat Hussain Khan S/O Khadim Hussain Khan	25-10-1973	D.I.Khan	05-11-1996	15-04-2014	18	Direct Selectee	DEO (M) DI Khan BS-19 working on acting charge base vide Notification No SO(SM)E & SED/3-2/2019/ Promotion B-18 to B-19 (MC) dt 27/05/2019	No.SO(S/M)E&SED/3-2/2013/recruitment of DDEO (BPS-18) (MaleC) dated 15-04-2014
10	Midrarullah S/O Molvi Hamdullah Jan	01-04-1972	Charsadda	02-07-1997	15-04-2014	18	Direct Selectee	DEO (M) Malakand BS-19 working on acting charge base vide Notification No SO(SM)E & SED/3-2/2019/ Promotion B-18 to B-19 (MC) dt 27/05/2019	No.SO(S/M)E&SED/3-2/2013/recruitment of DDEO (BPS-18) (MaleC) dated 15-04-2014
11	Muhammad Riaz S/O Muhammad Saeed	15-04-1974	Malakand	16-05-1994	15-04-2014	18	Direct Selectee	DEO (M) Swat BS-19 working on acting charge base vide Notification No SO(SM)E & SED/3-2/2019/ Promotion B-18 to B-19 (MC) dt 27/05/2019	No.SO(S/M)E&SED/3-2/2013/recruitment of DDEO (BPS-18) (MaleC) dated 15-04-2014
12	Sajjad Akhtar Iqbal S/O Muhammad Iqbal	03-03-1971	Swabi	01-06-1995	15-04-2014	18	Direct Selectee	DEO (M) BS-19 working on acting charge base vide Notification No SO(SM)E & SED/3-2/2019/ Promotion B-18 to B-19 (MC) dt 27/05/2019, but his Services placed at the disposal of Directorate of E&SE KPK vide Notification SO(S/M)E&SED/7-1/2021/posting/transfer/MC dated 05/07/2021	No.SO(S/M)E&SED/3-2/2013/recruitment of DDEO (BPS-18) (MaleC) dated 15-04-2014
13	Muhammad Idrees S/O Rustam Khan	06-01-1977	Swabi	16-10-2003	25-05-2016	18	Direct Selectee	DEO (M) Mardan B-19, working on acting charge base vide Notification No SO(SM)E & SED/3-3/2021/ Promotion B-18 to B-19 (MC) dt 21/04/2021	No.SO(S/M)E&SED/3-2/2013/recruitment of DDEO (BPS-18) (MaleC) dated 25/05/2016
14	Zahid Hussain S/O Muzaffar Khan	20-04-1971	Abbottabad	12-04-1999	25-05-2016	18	Direct Selectee	DEO (M) Kolai Pallas Kohistan B-19, working on acting charge base vide Notification No SO(SM)E & SED/3-3/2021/ Promotion B-18 to B-19 (MC) dt 21/04/2021	No.SO(S/M)E&SED/3-2/2013/recruitment of DDEO (BPS-18) (MaleC) dated 25/05/2016
15	Muhammad Sheraz S/O Naseer Gul	04-01-1975	Karak	22-11-2000	15-04-2014	18	Direct Selectee	DEO (M) Hanju BS-19 working on acting charge base vide Notification No SO(SM)E & SED/3-2/2019/ Promotion B-18 to B-19 (MC) dt 27/05/2019	No.SO(S/M)E&SED/3-2/2013/recruitment of DDEO (BPS-18) (MaleC) dated 15-04-2014
16	Umar Zaman S/O Muhammad Sulaiman	23-11-1964	Mansehra	04-12-1986	25-05-2016	18	Direct Selectee	DEO (M) Charsadda B-19, working on acting charge base vide Notification No SO(SM)E & SED/3-3/2021/ Promotion B-18 to B-19 (MC) dt 21/04/2021	No.SO(S/M)E&SED/3-2/2013/recruitment of DDEO (BPS-18) (MaleC) dated 25/05/2016
17	Muhammad Ashfaq Khan S/O Muhammad Hussain Khan	06-05-1968	Abbottabad	13-12-1990	25-05-2016	18	Direct Selectee	DEO (M) Battagram B-19, working on acting charge base vide Notification No SO(SM)E & SED/3-3/2021/ Promotion B-18 to B-19 (MC) dt 21/04/2021	No.SO(S/M)E&SED/3-2/2013/recruitment of DDEO (BPS-18) (MaleC) dated 25/05/2016
18	Zahid Muhammad S/O Sher Muhammad	14-06-1971	Peshawar	11-05-1996	15-04-2014	18	Direct Selectee	DEO (M) Swabi BS-19 working on acting charge base vide Notification No SO(SM)E & SED/3-2/2019/ Promotion B-18 to B-19 (MC) dt 27/05/2019	No.SO(S/M)E&SED/3-2/2013/recruitment of DDEO (BPS-18) (MaleC) dated 15-04-2014

-67-

S.#	Name of Officers	D/O Birth	Domicile	Date of 1st Entry in Edu; Dept;	Present Post date	BPS	Method of Recruit	Designation/Place of Posting	Remarks
19	Miftikharul Ghani S/O Ghaniur Rehman	20-04-1978	Swabi	01-04-1997	25-05-2016	18	Direct Selectee	DEO (M) Buner B-19, working on acting charge base vide Notification No SO(SM)E&SED/3-3/2021/Promotion B-18 to B-19 (MC) dt 21/04/2021	No.SO(S/M)E&SED/3-2/2013/recruitment of DDEO (BPS-18) (MaleC) dated 25/05/2016
20	Zahoor Khan S/O Abdul Qayyum Khan	01-03-1968	Peshawar	01-07-1997	25-05-2016	18	Direct Selectee	DEO (M) Lakki Marwat B-19, working on acting charge base vide Notification No SO(SM)E&SED/3-3/2021/Promotion B-18 to B-19 (MC) dt 21/04/2021	No.SO(S/M)E&SED/3-2/2013/recruitment of DDEO (BPS-18) (MaleC) dated 25/05/2016
21	Muhammad Tanveer s/o Faqeer Muhammad	01-01-1968	Abbotabad	26.12.1987	21-05-2019	18	By Promotion	DEO (M) Abbotabad in OPS	No.SO(SM)E&SED/3-1/2019/Promotion BS-17 to BS-18 (MC) Dated 21/05/2019
22	Meftah-ud-din s/o Syed Fazal Mabood Jan	03-03-1972	Dir Lower	01.03.1993	21-05-2019	18	By Promotion	DEO (M) Dir Lower in OPS	No.SO(SM)E&SED/3-1/2019/Promotion BS-17 to BS-18 (MC) Dated 21/05/2019
23	Atiq-ur-Rehman s/o Amir Jan	03-03-1972	karak	25.05.1997	21-05-2019	18	By Promotion	DDEO (M) Karak	No.SO(SM)E&SED/3-1/2019/Promotion BS-17 to BS-18 (MC) Dated 21/05/2019
24	Mahmood Ghazanavi s/o Amir Mehmood Shah	10-02-1971	Chitral	15.01.1998	21-05-2019	18	By Promotion	DDEO (M) Upper Chitral	No.SO(SM)E&SED/3-1/2019/Promotion BS-17 to BS-18 (MC) Dated 21/05/2019
25	Mukhtar Ahmad Khan s/o Anwar Khan	24-05-1964	Abbotabad	10.04.1994	21-05-2019	18	By Promotion	DDEO (M) Haripur	No.SO(SM)E&SED/3-1/2019/Promotion BS-17 to BS-18 (MC) Dated 21/05/2019
26	Abdur Rehman s/o Abdul Kafi	14-08-1972	Nowshera	10.04.1999	21-05-2019	18	By Promotion	DDEO (M) Dir Upper	No.SO(SM)E&SED/3-1/2019/Promotion BS-17 to BS-18 (MC) Dated 21/05/2019
27	Hidayatullah s/o Akbar Khan	02-03-1967	Malakand	12.03.1991	21-05-2019	18	By Promotion	DDEO (M) Malakand	No.SO(SM)E&SED/3-1/2019/Promotion BS-17 to BS-18 (MC) Dated 21/05/2019
28	Hayat Khan s/o Darwesh Khan	25-03-1973	Charsadda	15.12.1994	21-05-2019	18	By Promotion	DDEO (M) Khyber	No.SO(SM)E&SED/3-1/2019/Promotion BS-17 to BS-18 (MC) Dated 21/05/2019
29	Muhammad Anrangzeb s/o Ahmad Hussain	10-01-1970	Mansehra	04.03.1993	21-05-2019	18	By Promotion	DDEO (M) Shangla	No.SO(SM)E&SED/3-1/2019/Promotion BS-17 to BS-18 (MC) Dated 21/05/2019
30	Mushtaq Ahmad s/o Gulzar Ahmad	20-12-1970	Peshawar	27.02.1998	21-05-2019	18	By Promotion	Deputy Director Directorate of E&SE	No.SO(SM)E&SED/3-1/2019/Promotion BS-17 to BS-18 (MC) Dated 21/05/2019
31	Abdus Samad Jan s/o Sultan Ahmad	28-04-1974	Peshawar	06.04.1999	22-09-2019	18	By Promotion	Deputy Director (Lit) Directorate of E&SE	No.SO(SM)E&SED/3-1/2019/Promotion BS-17 to BS-18 (MC) Dated 22/09/2019
32	Abdul Malik s/o Muhammad Anwar	11-02-1973	Khy: Agency	05-10-1995	03-01-2014	18	By Promotion	DEO (Male) Bannu in OPS	No.SO(S/M)/E&SED/3-1/2021Promotion of (BS-18 MC) dt 12/08/2021
33	Fazle Wahid s/o Fazle Raziq	20-07-1974	Charsadda	01-04-1996	03-01-2014	18	By Promotion	Dy. Director Directorate E & SE	No.SO(S/M)/E&SED/3-1/2021Promotion of (BS-18 MC) dt 12/08/2021
34	Shah Jehan s/o Muhammad Hasan	15-09-1974	Nowshera	18-04-1994	03-01-2014	18	By Promotion	DEO (Male) Nowshera in OPS	No.SO(S/M)/E&SED/3-1/2021Promotion of (BS-18 MC) dt 12/08/2021
35	Syed Tahir Shah s/o Abdul Jalal	03-04-1978	Nowshera	01-11-2005	16-05-2016	18	By Promotion	DDEO (Male) Nowshera	No.SO(S/M)/E&SED/3-1/2021Promotion of (BS-18 MC) dt 12/08/2021

-68-

S.#	Name of Officers	D/O Birth	Domicile	Date of 1st; Entry in Edu; Deptt;	Present Post-date	BPS	Method of Recriut:	Designation/Place of Posting	Remarks
36	Nisar Ahmad s/o Lal Yamir	02-05-1971	karak	03-01-2014	03-01-2014	18	By Promotion	DY.DEO Hangu	No.SO(S/M)/E&SED/3-1/2021Promotion of (BS-18 MC) dt 12/08/2021
37	Misri Khan s/o Pasham Gul	10-05-1977	Peshawar	28-04-1999	16-05-2016	18	By Promotion	DDEO (Male) Charsadda	No.SO(S/M)/E&SED/3-1/2021Promotion of (BS-18 MC) dt 12/08/2021
38	Liaqat Ali s/o Gawar Khan	23-04-1975	Mohd Agy	01-01-2005	03-01-2014	18	By Promotion	Awaiting for posting	No.SO(S/M)/E&SED/3-1/2021Promotion of (BS-18 MC) dt 12/08/2021
39	Irfan Ali s/o Gauhar Ali	20-02-1976	Charsadda	03-01-2014	03-01-2014	18	By Promotion	DY.DEO (Male) Peshawar	No.SO(S/M)/E&SED/3-1/2021Promotion of (BS-18 MC) dt 12/08/2021
40	Muhammad Ilyas Khan s/o Asil Janan	04-04-1977	Karak	03-01-2014	03-01-2014	18	By Promotion	DY.DEO (male) Kohistan Lower	No.SO(S/M)/E&SED/3-1/2021Promotion of (BS-18 MC) dt 12/08/2021

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



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-69-

**DISTRICT EDUCATION OFFICE (MALE)
ELEMENTARY & SECONDARY DIR
LOWER EDUCATION**

To No.2256 Dated Balambat the 20th April, 2022

The Honourable Secretary,
Elementary & Secondary Education Department,
Govt. Of Khyber Pakhtunkhwa.

Jan
22/4/22

Subject: REVISED AND UPDATED (FINAL) SENIORITY OF ADDITIONAL DIRECTORS/DISTRICT
EDUCATION OFFICERS BPS-19 MALE (MANAGEMENT CADRE) AS STOOD ON
12/10/2021 E&SE DEPARTMENT.

Sir,

Reference to the Directorate of E&SE Khyber Pakhtunkhwa letter issued/intimated to the Admn. Department vide No.833 dated 16/3/2022 (*see pages 5-7*) and in continuation of the appeal vide No.8075 dated Peshawar the 10th November, 2021 (*copy attached as pages 8-10*), the undersigned once again submits this fresh appeal against the above cited subject "Revised and Updated (Final) Senioity List of Additional Directors/District Education Officers BS-19 Male (Management Cadre) as stood on 12/10/2021 E&SE Department" for making necessary corrections in the same in accordance with the prevailing rules of seniority and restoring justice to the appellatant whose legal right/rightful place in the order of seniority has been assailed.

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It is to be kindly note that hitherto the name of the undersigned appellatant had not been included in the final inter-se seniority list of DEOs but now that after so many appeals his name is being included, he is not being placed at the position in the draft-final seniority he deserves as per rules governing seniority of civil servants. Consequently, the undersigned beseeches as follows:-

3862

1. That the subject seniority list has not been corrected/revised/updated in accordance with the prevailing rules of seniority and is therefore, still discriminatory, devoid of merit and is diametrically against the inter-se seniority/merit determined and conveyed to the Department by Khyber Pakhtunkhwa Public Service Commission (KPPSC) for determination of inter-se seniority. Hence, it is illegal and unlawful and against the fundamental right of the appellatant.
2. That it is discriminatory and unlawful in that it has drawn an artificial, self-imagined, self-beneficial and self-formulated distinction between the officers selected directly on 60% teaching quota and 40% open market quota.
3. That it is devoid of merit in that it has arbitrarily, illegally and unlawfully given preference in seniority to below inter-se merit officers over those high in merit against the inter-se merit/seniority determined and conveyed by the KPPSC vide Nos.SR1/036824 dated 02/8/2012, and dated 19/11/2013 and vide No.PSC/DR/19/(DIR)/2020 Dated 21/07/2020 (*see pages 11-16*)
4. That the referred final seniority is a naked attempt of fabrication and distortion of historical facts by intentionally omitting the afore-mentioned inter-se merit/seniority of KPPSC for seniority determination of DEOs/Additional Directors to smartly hide inter-se merit/score and show actual seniority position of officers, cover up the historic injustice meted out to deserving officers and illegally favour below inter-se merit officers. *See pages 6-7.*
5. That to hoodwink the officers selected on open market reserved seats and deprive them along with the undersigned of their due right, the referred seniority has been purposefully drafted with mala fide intention on recommendations for initial appointment by the KPPSC vide No.K.P.K.PSC-SR-VI/32104 Dated 18/06/2010 which was meant only for app32ointment/posting of the subject officers and not for determination of their inter-se seniority wherein the Commission clearly/specifically

625
27/4
For personal record

mentioned in Para-2 that the "Inter-se Seniority of the recommendees will be sent later and the aerial chronological order does not confer the right of seniority in this regard". See page 17-18.

6. That as mentioned above, time and again, the KPPSC has conveyed the inter-se seniority to the Department but no one at helm of Directorate has a fair conscience to uphold merit and ensure correct order of inter-se seniority of the concerned officers which clearly indicates ulterior motives behind non-compliance of the rules.
7. That it is a well-established legal norm that seniority of officers appointed/recruited on initial basis on recommendation of the public service commission, to the exclusion of any other method, has to be determined in accordance with the inter-se merit/seniority as determined by the public service commission in pursuance of section 8 of the Civil Servants Act, 1973 and Part-VI; Seniority, Rule 17 (1) (a) of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989. See pages 19-21.
8. That the mentioned final seniority has been drafted in blatant violation of fundamental rights given in the 1973 Constitution of the Islamic Republic of Pakistan as well as the seniority rules set out in the Khyber Pakhtunkhwa Civil Servant Act 1973 and the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 by unfairly and arbitrarily allowing unlawful preference to below inter-se merit officers directly selected on initial basis availing departmental 60% quota over those directly selected on 40% open market quota under the same advertisement and process.
9. That despite the crystal-clear fact, that all the top slot BS-19 MC officers including the undersigned were recruited/appointed on initial basis under the same advertisement, same process of recruitment and same notification even then their respective inter-se seniority has not been drafted in accordance with the established rules of seniority as mentioned in Para-7.
10. That all being initially/directly recruited is itself confessed by the Directorate in the draft final seniority list attached with the above-mentioned letter of Directorate for intimating final seniority. See page 6-7.
11. That the Directorate of E&SE, Khyber Pakhtunkhwa is duty bound to draft and submit to your good-self a legally correct draft of the subject seniority for final notification without taking side with some blue-eyed officers.
12. That it is worth mentioning that on multiple times the E&SE Department has directed the Director E&SE to convey updated tentative/final seniority in accordance with the set rules, policy and inter-se merit but each time he has unfortunately overlooked the same while submitting the updated/revised seniority. See pages 22-24.
13. That the E&SE Department vide its letters Nos. SO(S/F)E&SED/4-24/2018/Seniority List/BS-18/F/MC Dated Peshawar the July 5th, 2018 and SO(S/F)E&SED/4-24/2018/Seniority List/BS-18/F/MC Dated Peshawar the July 18th, 2018 has already clarified to the Directorate that for determination of seniority "administrative department or any other authority has no power to change merit as communicated by Khyber Pakhtunkhwa Public Service Commission". See pages 26-26.
14. That not attaching the inter-se merit/seniority determined by the Khyber Pakhtunkhwa Public Service Commission with the above-mentioned subject draft-final seniority conveyed by Directorate to the Admn. Department is an obvious brazen attempt on part of the Directorate to conceal and distort actual position/order of seniority of pioneer BS-19 MC officers, cover up the historical injustice meted out to those with high inter-se merit, favour below merit officers and to continue to deny due rights to those officers (including the undersigned) who have been deprived of their due seniority (copy of the KPPSC inter-se merit/seniority is attached as pages 11-16).
15. That the inquiry, as referred to in the Subject Report, despite sadly being a confused, non-serious and casual attempt to settle the career building/destroying issue of DEOs

-71-

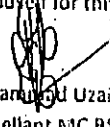
seniority by wrongly interpreting court judgments, missing personal hearing of the appellants, etc. still had to concede the truth that seniority ought to be in accordance with the inter-se merit/seniority as determined by public service commission. See page 27-33.

16. That the claim made by the Directorate in its above-mentioned report about the updation/revision of the seniority in the light of the inquiry is contestable and contrary to the fact in that the same inquiry has inevitably conceded that seniority ought to be in accordance with the inter-se merit/seniority as determined by public service commission. See page
17. That the above subject impugned final seniority amply unveils those at the helms of the establishment of the Directorate that they are unable to discharge their official responsibilities in accordance with merit, rules, regulations, policies and objectivity and, therefore, they may be strictly directed to follow rules, regulations, equity and justice as no one is above the law and that rule of law equally applies to all without prejudice to or distinction of cost, color, creed and socio-politico-economic or official status.
18. That it is pertinent to mention that Serial 07 to 19 officers included in the subject draft-final seniority on basis of promotion from the posts of Deputy District Education Officers (M/F) have already been ensured their inter-se seniority in accordance with the inter-se merit/seniority as determined by the KPPSC despite the fact that these DDEOs were also initially recruited on the same 60-40 % ratio formula (Departmental & Open Market Quotas) for appointment despite of their appeals for basing their seniority on 60-40 % departmental and open market ratio on the pattern of 2012 seniority of DEOs. The admn. Department while rejecting their appeals clarified that the "administrative department or any other authority has no power to change merit as communicated by Khyber Pakhtunkhwa Public Service Commission". See pages 25-26.
19. That the addition of this fresh promoted BS-19 Serial 07 to 19 DEOs with seniority actually based on the KPPSC inter-se seniority into the mainstream of pioneer-DEOs has already spawned/ushered in a new but dialectically opposite creeds/blend of equal and unequal in the list of DEOs belonging to the same Management cadre.
20. That the final seniority, if notified, as per this illegal and discriminatory draft, will surely deprive the undersigned of his due right under civil service rules protected under the Constitution of Islamic Republic of Pakistan in which case the appellant reserves constitutional right to knock at the door/s of higher forum/s available under the law for ultimate justice. See page 34 for KPPSC-based correct version of Seniority of pioneer DEOs/Additional Directors.

Honourable Sir,

As legally correct merit-based seniority in cases of initial appointments is the basic right of every civil servant upon which depends his whole service career of a civil servant and as the Honourable Competent Authorities are the custodians of the due/fundamental rights of their subordinate civil servants, your goodself is once again very humbly requested to favourably consider this appeal for correctly placing the name of the undersigned in the seniority list of Additional Directors/DEOs B-19 Management Cadre as per the well-established rules set out in the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989 Part-VI, Seniority: Rule 17 (1) (a) safeguarded by the Constitution of the Islamic Republic of Pakistan and thus save him from mental torture as well as unnecessary litigation while sufficient powers are vested in Admn. Department to address such issues and redress wrongful acts.

The undersigned shall be very grateful and obliged to your good self for this great gesture and act of administrative justice.


Muhammad Uzair Ali
Appellant MC.BS-19
District Education Officer (MA) District

Scanned with CamScanner

Diary No. 31/4/22

FTS No. 104/2022

Date. 27/4/22

-72-

Endst: of Even No. & Date

Copy for information to the Honourables:-

1. Chief Secretary, Government of Khyber Pakhtunkhwa.
2. Secretary Establishment, Government of Khyber Pakhtunkhwa.
3. Special Secretary, Elementary & Secondary Department, Government of Khyber Pakhtunkhwa.
4. Additional Secretary Estab. Elementary & Secondary Education, Government of Khyber Pakhtunkhwa.
5. Section Officer (Schools Male), Elementary & Secondary Education, Khyber Pakhtunkhwa.
6. PA to Director, Directorate of E&SE, Khyber Pakhtunkhwa.
7. Copy for personal Record.

24/4

Muhammad Uzair Ali
Appellant MC BS-19

District Education Officer (M) Dir. Lower

Documents attached.

1. Assistant Director's letter to Section Officer (Schools Male) ER&SED vide No.833 dated 16/3/2022. Page 5.
2. Tentative Seniority list communicated vide the above-mentioned letter. Page 6-7.
3. Appeal against the tentative Seniority to Secretary E&SED. Page 8-10.
4. KPPSC inter-se seniority of DEOs/Additional Directors dated 19/11/2013. Page 11-12.
5. KPPSC letter to Director vide No. PSC/DR/19/(DR)/2020 Dated 21/07/2020. Page 13.
6. KPPSC inter-se seniority communicated to Director vide the above-mentioned letter. Pages 14-16.
7. Recommendations of the KPPSC for appointments/posting of male district education officers/Additional Directors vide No.K.P.K.PSC-SH-VI/32104 Dated 15/06/2010. Pages 17-28.
8. Seniority; AP1 Act 1973. Pages 19-20.
9. Seniority; AP1 Rules, 1989. Page 21.
10. Section Officer (Schools Male) letter to Director vide No. SO(SM)ER&SED/1-1/2017/Promotion BS-19 to 20 (MC) Dated Peshawar the May 14, 2018. Page 22.
11. Section Officer (Schools Male) to Director vide No.SO(SM)E&SED/4-25/2018/Seniority of MC Officers BS-19 Dated Peshawar the July 27, 2018. Page 23
12. Section Officer (Schools Male) letter to Director vide No. SO(S/M)E&SED/4-25/2016/Seniority of Abdul Basit Dated Peshawar the January 26, 2016. Page 24.
13. Section Officer (S/F) letter to Director vide No. SO(S/F)E&SED/4-24/2018/Seniority List/BS-18/F/MC Dated Peshawar the July 5th, 2018. Page 25.
14. Section Officer letter to Director vide No. SO(S/F)E&SED/4-24/2018/Seniority List/BS-18/F/MC. Date 1 Peshawar the July 18th, 2018. Page 26.
15. Inquiry conducted by Directorate with DEO (F) Samina Ghoni in Chair. Pages 27-33
16. Proposed/Requested KPPSC-based draft seniority of DEOs/Additional Directors. Page 34

-73-

VAKALATNAMA
BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

APPEAL NO: _____ OF 2022

M. Uzair Ali

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Education Deptt

(RESPONDENT)
(DEFENDANT)

I/we M. Uzair Ali

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

Dated. ____/____/2022




CLIENT

ACCEPTED

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


UMAR FAROOQ MOHMAND


WALEED ADNAN

&


MUHAMMAD AYUB
ADVOCATES

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