

05.01.2023

Learned counsel for the appellant present. Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.

This case was heard by a Bench comprising of one of us Mr. Mian Muhammad, Member (Executive), and Mr. Salah-ud-Din Member (Judicial), therefore, let it be fixed before the said bench on 31.01.2023 for order and consideration.

SCANNED  
KPST  
Peshawar



(Mian Muhammad)  
Member (E)




(Kalim Arshad Khan)  
Chairman

20<sup>th</sup> Oct, 2022

Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl: AG for respondents present.

Learned counsel for the appellant seeks adjournment on the ground that he has not prepared the case. To come up for arguments on 20.12.2022 before D.B.

  
(Fareeha Paul)  
Member(Executive)

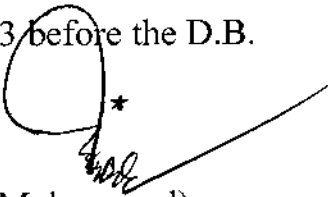
  
(Kalim Arshad Khan)  
Chairman


20.12.2022

Mr. Umar Farooq Mohmand, Advocate for the appellant present. Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.

Arguments heard. To come up for order and consideration on

05.01.2023 before the D.B.

  
(Mian Muhammad)  
Member (E)


  
(Salah-Ud-Din)  
Member (J)

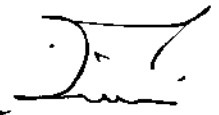
SCANNED  
KSPBT  
Peshawar

28.04.2022

Mr. Mujeeb-ur-Rehman, Advocate (junior of learned counsel for the appellant) present. Mr. Shahid Anwar, ADO alongwith Mr. Riaz Ahmed Paindakhel, Assistant Advocate General for the respondents present.

Junior of learned counsel for the appellant sought adjournment on the ground that learned counsel for the appellant is busy in the august Peshawar High Court, Peshawar. Adjourned. To come up for arguments on 19.07.2022 before the D.B.

  
(Mian Muhammad)  
Member (E)

  
(Salah-ud-Din)  
Member (J)

19.07.2022

Proper Bench is not available, therefore, case is adjourned to 20.10.2022 for the same as before.

  
Reader

12.07.2021

Learned Addl, A.G be reminded about the omission and for submission of reply/comments within extended time of 10 days.

  
Chairman

Stipulated period passed reply not submitted.

14.09.2021

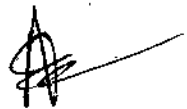
Appellant present through counsel.

Muhammad Adeel Butt learned Additional A.G alongwith Shahid Aman ADEO (Litigation) for respondents present.

Reply on behalf of official respondents submitted. Request for adjournment was made on behalf of appellant. Request is acceded. To come up for arguments on 11.01.2022 before D.B.



(Rozina Rehman)  
Member (J)



Chairman

11.01.2022

Counsel for the appellant Mr. Muhammad Adeel Butt, Addl. AG alongwith Shaheed Anwar, ADEO for the respondents present.

Former requested for adjournment in order to go through the written reply/comments of the respondents. Request is accorded. To come up for arguments on 28.04.2022 before the D.B.



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



Chairman

27.05.2021

Counsel for the appellant present. Preliminary arguments heard.

Points raised need consideration. The appeal is admitted to regular hearing subject to all legal objections available to the respondents. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days of the receipt of notices positively. If the written reply/comments are not submitted within the stipulated time, the office is required to submit the file with a report of non-compliance. File to come up for arguments on 14.09.2021 before the D.B.

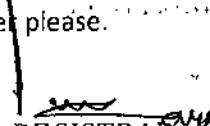
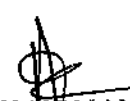
Appellant Deposited  
Security & Process Fee

  
Chairman

FORM OF ORDER SHEET

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

Case No.- 3916 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	18/03/2021	<p>The appeal of Mr. Fazal Akbar resubmitted today by Mr. Noor Muhammad Khattak Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 12/3/2021</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>27/05/21</u></p> <p style="text-align: right;"> CHAIRMAN (for completion) (ex post facto)</p>

SCANNED  
KOT  
Peshawar

The appeal of Mr. Fazal Akbar CT GHSS Ouch District Dir Lower received today i.e. on 01/03/2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- ① 1- Addresses of respondents no. 4 to 19 are incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 2- Copy of impugned seniority list dated 26.10.2019 mentioned in the memo of appeal is not attached with the appeal which may be placed on it.
- 3- Annexure-E of the appeal is illegible which may be replaced by legible/better one.
- 4- One more copy/set of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 427 /S.T,


Dt. 02/03 /2021

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Noor Muhammad Khattak Adv. Pesh.

Note:

- ⇒ Objection No. 1 correct and respondents are placed at the disposal of Respondent No. 3
  - ⇒ Objection No. 2, impugned Seniority list date 26.10.2019 is attached as annex - C, and is correct.
  - ⇒ Objection No. 3 is replaced by better copy attached.
  - ⇒ Objection No. 4, copy is provided complete in all respect
- Hence, re-submitted today Dated 10.03.2021



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

APPEAL NO. 3916/2021

**FAZAL AKBAR**

**VS**

**EDUCATION DEPTT**

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**APPELLANT**

**THROUGH:**

**NOOR MOHAMMAD KHATTAK**

OFFICE: Flat No.4, 2<sup>nd</sup> Floor,

Juma Khan Plaza,

Near FATA Secretariat,

Warsak Road, Peshawar.

0345-9383141.



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

**APPEAL NO. \_\_\_\_\_/2021**

Mr. Fazal Akbar, Certified Teacher (BPS-15),  
GHSS Ouch, District Dir Lower.

..... **APPELLANT**

**VERSUS**

- 1- The Secretary E&SE Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director E&SE Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The District Education Officer (M), District Dir Lower.
- 4- Mr. Ihtisham Ul Haq, C.T (BPS-15) (NTS)
- 5- Mr. Lal Zada, C.T (BPS-15) (NTS)
- 6- Mr. Latif Ur Rehman, C.T (BPS-15) (NTS)
- 7- Mr. Misbah Ur Rehman, C.T (BPS-15) (NTS)
- 8- Mr. Aziz Ullah Jan, C.T (BPS-15) (NTS)
- 9- Mr. Irfan Uddin, C.T (BPS-15) (NTS)
- 10- Mr. bakht munir, C.T (BPS-15) (NTS)
- 11- Mr. Inayat Ullah, C.T (BPS-15) (NTS)
- 12- Mr. Zakir Ullah, C.T (BPS-15) (NTS)
- 13- Mr. Waheed Zada, C.T (BPS-15) (NTS)
- 14- Mr. Muhammad Israr, C.T (BPS-15) (NTS)
- 15- Mr. Majeedullah Khan, C.T (BPS-15) (NTS)
- 16- Mr. Mehmood Ur Rehman, C.T (BPS-15) (NTS)
- 17- Mr. Isrhad Mehmood, C.T (BPS-15) (NTS)
- 18- Mr. Muhammad Shahid, C.T (BPS-15) (NTS)
- 19- Mr. Mumtaz Bakht, C.T (BPS-15) (NTS)

**All care of District Education officer (M), Dir Lower.**

..... **RESPONDENTS**

**APPEAL UNDER SECTION-4 OF THE KHYBER**  
**PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974**  
**AGAINST THE FINAL SENIORITY LIST OF CERTIFIED**  
**TEACHERS (BPS-15) CIRCULATED ON 26.10.2019**  
**WHEREBY THE NAME OF THE APPELLANT HAS NOT**  
**BEEN INCLUDED AND THE PRIVATE RESPONDENTS**  
**HAVE BEEN ALLOWED/GRANTED SENIORITY FROM THE**  
**DATE OF ADHOC/CONTRACTUAL APPOINTMENT I.E.**  
**30.4.2014 IN UTTER VIOLATION LAW & RULES AND**  
**AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL**  
**APPEAL OF THE APPELLANT ON NO GOOD GROUNDS**  
**WITH IN THE STIPULATED PERIOD OF NINETY DAYS**

**PRAYER:**

That on acceptance of this appeal the impugned seniority list circulated on 26.10.2019 may kindly be modified/rectified to the extent of enlisting the name of the appellant at the right position and also to the extent of private respondents by allowing them seniority from the date of regularization on the post of certified teacher (BPS-15) and not w.e.f. the date of initial contractual/adhoc appointment i.e. w.e.f. 7.3.2018 instead of 30.4.2014. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

**R/SHEWETH:**

**ON FACTS:**

- 1- That appellant was initially appointed as PST (BPS-7) now BPS-12 in the respondents Department vide order dated 17.03.1993. Copy of the appointment order is attached as annexure ..... **A.**
- 2- That During service the appellant was promoted to the post of Certified Teacher (BPS-15) on regular basis and on the recommendation of the Departmental promotion committee vide office order dated 26.08.2017, Consequently the appellant submitted his charge report and started his duty as C.T teacher quite efficiently and up to the entire satisfaction of my superiors. Copy of the promotion order is attached as annexure ..... **B.**
- 3- That recently the District Education Officer (M), Dir Lower i.e. respondent No.3 circulated final seniority list of certified teachers of Dir lower whereby the name of the appellant has totally been ignored while those NTS teachers who have been appointed as adhoc/contract C.T in BPS-15 in the year 2014 and were regularized vide office order dated 7.3.2018 have been allowed seniority in the cadre of C.T (BPS-15) from the date of initial contractual/Adhoc appointment i.e. w.e.f. 30.4.2014. Copies of the impugned seniority list and regularization order of the private respondents are attached as annexure ..... **C and D.**
- 4- That feeling aggrieved the appellant and his colleagues visited the office of the respondent No.3 and in response the respondent No.3 seeks guidance from the respondent No.2 vide letter dated 23.10.2019 but of no avail. Copy of the letter is attached as annexure ..... **E.**

5- That feeling aggrieved the appellant filed Departmental appeal before the respondent No.2 but no response has been received from the concerned quarter. Copy of the Departmental appeal is attached as annexure ..... F.

6- That, feeling aggrieved from the inaction of the respondent by not rectifying/Correcting the impugned seniority list dated 26.10.2019 and having no other adequate remedy prefer the instant appeal on the following grounds amongst the others.

**GROUND:**

A- That the impugned seniority list circulated on 26.10.2019 issued by the respondents is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be modified/ rectified.

B- That the appellant has not been treated by the respondent Department in accordance with law and rules and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.

C- That the treatment meted out to the appellant is discriminatory in nature.

D- That the impugned seniority list dated 26.10.2019 has been issued by the respondents in arbitrary and malafide manner, therefore not tenable and liable to be modified.

E- That according to Law and Rules seniority shall always be reckoned from the date of first regular appointment but in this case seniority has been granted/allowed to the private respondents from the date of contractual appointment which is illegal and against the prevailing rules.

F- That the said seniority list is violative of section-8 of the Civil servant Act, 1973 as well as appointment, promotion and transfer Rules 1989, hence not tenable and liable to be modified/rectified.

G- That, the act of the respondent is against the dictum enshrined in Article 38 (e) of the Constitution of Islamic Republic of Pakistan, that to "*reduce disparity in the income and earning of the individual including persons in different classes in the service of Pakistan*".

H- 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 be accepted as prayed for.

**APPELLANT**



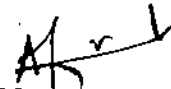
**FAZAL AKBAR**

THROUGH:



**NOOR MOHAMMAD KHATTAK**

**&**



**AFRASIYAB KHAN WAZIR**  
**ADVOCATES**

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

APPEAL NO. \_\_\_\_\_/2021

**ADDRESSES OF PARTIES FOR THE PURPOSE OF SERVICE**

**FOR APPELLANT:**

Mr. Fazal Akbar, Certified Teacher (BPS-15),  
GHSS Ouch, District Dir Lower

**FOR RESPONDENTS:**

- 1- The Secretary (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The District Education officer (M), District Dir Lower.
- 4- Mr. Ihtisham Ul Haq, CT (BPS-15) (NST), GMS Koorshung, District Dir Lower.
- 5- Mr. Lal Zada, CT (BPS-15) (NST), GHS Watangi, District Dir Lower.
- 6- Mr. Latif Ur Rahman, CT (BPS-15) (NST), GHS Takoro, District Dir Lower.
- 7- Mr. Misbahur Rahman, CT (BPS-15), (NST), GHS Shorshing, District Dir Lower.
- 8- Mr. Aziz Ullah Jan, CT (BPS-15), (NST), GMS Nawagai Asbanr, District Dir Lower.
- 9- Mr. Irfan Uddin, CT (BPS-15) (NST), GMS Buchakai, District Dir Lower.
- 10- Mr. Bakht Munir, CT (BPS-15) (NST), GMS Mulyano Banda, District Dir Lower.
- 11- Mr. Inayat Ullah, CT (BPS-15) (NST), GMS Undisa, District Dir Lower.
- 12- Mr. Zakir Ullah, CT (BPS-15) (NST), GMS Gall Maidan, District Dir Lower.
- 13- Mr. Waheed Zada, CT (BPS-15) (NST), GHS Shal Kandi, District Dir Lower.
- 14- Mr. Muhammad Israr, CT (BPS-15) (NST), GMS Dhall, District Dir Lower.
- 15- Mr. Majeedullah Khan, CT (BPS-15) (NST), GHS Maskini, District Dir Lower.
- 16- Mr. Mehmood Ur Rehman, CT (BPS-15) (NST), GHS Damtal, District Dir Lower.

17-Mr. Irshad Mehmood, CT (BPS-15) (NST), GMS Kakas, District Dir Lower.

18-Mr. Muhammad Shahid, CT (BPS-15) (NST), GMS Nimaz Kot, District Dir Lower.

19-Mr. Mumtaz Bakht, CT (BPS-15) (NST), GMS Mirakai, District Dir Lower

Appellant

Through:

NOOR MOHAMMAD KHATTAK,  
Advocate, High Court, Peshawar

APPOINTMENT ORDER.

Annexure A (5)

The following trained IPT candidates are hereby appointed against the post of IPT in the scale of BPS.No.7 Rs.1095-60-1995 plus usual allowances as admissible under the rules in the interest of public service from the date of their taking over charges purely on the basis of Marks obtained/Merit/Interviewed as reflected in the existing recruitment policy of the Government.

S.No./Name/W.Name.	School where appointed.	Constituency where appointed.	Constituency to which belongs.	Marks Obtained.
1. Ilyas Masih s/o Kebanga Masih. Fkd.	M.S. Banjo Legai.	F.P.-80	F.P.-80	690/1200
2. Fazli-Uddin s/o Sarokat Bin. Jalai.	GTL. Shah Kot.	F.P.-80	F.P.-80	687
3. Fazal Akbar s/o Sultanat Khan. Mathani. Gera. Totai.		F.P.-80	F.P.-80	685
4. Ikraud-Bin. s/o Jamal Khan. Agra.	GTL. Sind Gaera.	F.P.-80	F.P.-80	667
5. Kursalin. s/o Amir Hamza. Allahdand.	M.S. Karbila.	F.P.-80	F.P.-80	665

TERMS AND CONDITIONS.

1. No TA/DA is allowed being first appointment.
2. Charge reports should be submitted in duplicate to all concerned.
3. They are directed to produce their health and age certificate from the Agency Surgeon concerned before taking over charges. In case their age below 18 years or above 28 years should not be handed over the charges. The State/ASBACs concerned should have to check their original documents.
4. They are directed to take over charges within fifteen days from the issue of this order, otherwise the appointment will automatically stand cancelled.
5. Their appointment are made purely on temporary basis and will be liable to termination at any time without any notice or assigning any reason. In case they wish to resign the post he will have to submit one months prior notice or forfeit one months pay, in lieu thereof.

(MORARAJ KHAR)  
DISTRICT EDUCATION OFFICER (M)  
PRIMARY MANAGER AT BATHHELA.

Indst: no. 670-78 / S.No. A-1/Vol: V/ Lett: dated Bathhele the 17/13/93.

Copy of the above order is forwarded for information and necessary action to:-  
 1. The Director Primary Education N.P.P, B/abad, Dehrawar.  
 2. Mr. Lal Mohammad Khan I.B.F.60 Post Bahizai Thana.  
 3. The Sub-Divisional Officer (M) Swat Bahizai at Bahkend.  
 4. The Agency Accounts Officer, Bahkend.  
 5. The candidates concerned.

(MORARAJ KHAR)  
DISTRICT EDUCATION OFFICER (M)  
PRIMARY MANAGER AT BATHHELA.

ATTESTED

## District Education Officer (M) Dir Lower



PH No. 0945-9250082,

E-mail emisdirlower@yahoo.com

Fazal Akber

C.T

G.S.S.H.S.S

Ollch

C.No 23

**OFFICE ORDER:**

Consequent upon the recommendation of the District Selection/Promotion Committee Dir Lower in its meeting held on 21/08/2017 and in pursuance of Notification No SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre Dated 13/11/2012 issued by the Govt Of KPK (E&SE) Deptt: Peshawar and Notification No SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre Dated 24/04/2013 issued by the Govt Of KPK (E&SE) Deptt: Peshawar, the following PSHTs/SPSTs (Male) are hereby promoted to CT BPS-15 @ (Rs.16120-1330-56070) plus usual allowances as admissible to them under the rules in the schools noted against their names in the interest of public service with immediate effect.

Slr	Seniority No	Name	Father Name	DESG	Name of GPS Where working	Proposed School	Remarks
1	160	HISSAN UR REHMAN	KHALIL UR REHMAN	PSHT	GPS JANAMA	GHS MAYAR JANDOOOL	A.V.P
2	184	SADIQ UR RAHMAN	SAIFUR RAHMAN	PSHT	GPS BAHDAI SHAH BADWAN	GHS LIKO BADWAN	A.V.P
3	316	TILAWAT KHAN	TAWAQOOR KHAN	PSHT	GPS MIAN KALAY KANDAW	GHS MIUNDA	A.V.P
4	370	QADAR KHAN	SAID RAMSAY	PSHT	GPS SAN CHENARQHA	GHS BAKHT BILANDA	A.V.P
5	412	ADDUL GHANI	ALAM KHAN	PSHT	GPS SHALKANDAI	GHS SHALKANDAI	A.V.P
6	454	MUHAMMAD ISRAR	SARTARAZ KHAN	PSHT	GPS ISLAMABAD	GHS BADWAN	A.V.P
7	516	FAZIL MAJIK	FAZEL SUBHAN	PSHT	GPS KWARA	GHS KADH	A.V.P
8	544	MUHAMMAD GULAD	GHIJAZA KARAM	PSHT	GPS BIRAGAM	GHS MAIDAN BANDAI	A.V.P
9	623	GUL QADIR	KHOWROOZ KHAN	PSHT	GPS ISLAM GAT	GHS SADBAR KALAY	A.V.P
10	647	SUFAYD GHI	SAFED GUL	PSHT	GPS MOJDA SHAN	GHS ADAM DHERI	A.V.P
11	649	SARDAR MUHAMMAD	TAJAL MUHAMMAD KHAN	PSHT	GPS SIAL KOTO	GHS RANI	A.V.P
12	686	FAZAL HUSSAIN	GHIJAZA MUHAMMAD	PSHT	GPS MIRGAM KARAKH	GHS DAPOOR BALO KHAN	A.V.P
13	698	TASHI UL LISAI	GHANI MAJAK	PSHT	GPS GUNGAI MAIDAN	GHS LAL QILLA	A.V.P
14	699	MUHAMMAD HAWAZ KHAN	FARDOUS KHAN	PSHT	GPS LARKANDI BALO KHAN	GHS DAPOOR BALO KHAN	A.V.P
15	691	MUHAMMAD AYUB	KHOWROOZ KHAN	PSHT	GPS KHARAI MASRHI	GHS QAJDARY	A.V.P
16	695	MIAN JAN	GULA JANI	PSHT	GPS JABARD BELA	GHS GUMBATAI MAIDAN	A.V.P
17	719	NOOR ZADA	MIAN GUL	PSHT	GPS GANILA	GHS BAIR	A.V.P

ATTESTED



18	7	MURJANIMAD SALIM	SHARIF KHAN	SPST	GPS TANGI 3 KHAN	GMS BANDAGAI	A.V.P
19	10	ZAKIR SHAH	ABDUL MALIK	SPST	GPS AHMAD GALAI NO. 1	GHS BAJAWRO	A.V.P
20	11	SHAAJID DIN	AHMAD HUSSAIN	SPST	GPS TIRAS BANRGAJ	GHS MIAN BRONGOLA	A.V.P
21	27	ASGHAR ALI	HADI KHAN	SPST	GPS KHAMBRO	GHS MIAN BRONGALA	A.V.P
22	31	AZAM KHAN	KHAN WALI	SPST	GPS GATO SARAI BALA	GMS BANDAGAI	A.V.P
23	38	FAZAL AKBER	SULTANAT KHAN	SPST	GPS OUCH NO. 1	GHS OUCH	A.V.P
24	40	SAHIB GUL	BUKHAR SAID	SPST	GPS BAGHRAN DAI	GHS SEKSADA	A.V.P
25	55	MUHAMMAD IKRAM	SABIR REHMAN	SPST	GPS MAYAR NO. 1	GHS MAYAR	A.V.P
26	50	SHAH ZAMIN KHAN	BEHT ZAMIN KHAN	SPST	GPS TANGAI KHAYAR	GMS TINJAGARA	A.V.P
27	105	MUSAFAR SHAH	WAZIR MUHAMMAD	SPST	GPS BEGHAM DARA	GMS ANDHERI	A.V.P
28	122	BACHA KARAM	GUL FARAZ KHAN	SPST	GPS KHAMBRO	GHS MIAN BRONGOLA	A.V.P
29	149	MUHAMMAD SADIQ	NOOR MUHAMMAD SHAH	SPST	GPS SHAWA, TINDO DAG	GMS SHAH ALAM BABA	A.V.P
30	146	GUL HAJI JAN	SHARIF JAN	SPST	GPS TANGAI KHAYAR	GMS BALAMBAT	A.V.P
31	167	MUHAMMAD NISAR KHAN	ABDUL SALAM	SPST	GPS ISLAMABAD	GHS MAYAR KHADAGZAI	A.V.P
32	168	SHAH NAWAZ KHAN	RAZA KHAN	SPST	GPS BALAMBAT	GMS BALAMBAT	A.V.P
33	172	ANWAR HUSSAIN	GHULAM SARWAR	SPST	GPS SARAI PAYEEN	GHS SARAI BALA	A.V.P
34	177	SAJAD ULLAH	SHER MUHAMMAD KHAN	SPST	GPS MANOGAI	GHS MALAKAND	A.V.P
35	182	SALEEM KHAN	ALIR NAWAZ KHAN	SPST	GPS ADAIDERAI	GHS OUCH	A.V.P
36	191	AMIN ULLAH	KHAISTA	SPST	GPS KAMAL KHAI TAIL	GMS KAMAL KHAI TAIL	A.V.P
37	195	HAMID UR RAHMAN	FAZAL UR RAHMAN	SPST	GPS LKO	GMS LKO BADWAN	A.V.P
38	211	ZAHID KHAN	TAWATTOOR KHAN	SPST	GPS ISLAM DHERAI	GMS MANOGAI	A.V.P
39	215	MUHAMMAD RYAS	ABDUR RAHMAN	SPST	GPS GALKOH SHALFALAM	GHS LUQ BUDA	A.V.P
40	240	MUHAMMAD ISRAR KHAN	SAKHI JAN	SPST	GPS MIAN KALAY KANDAW	GMS KOTKAI P KHIL	A.V.P
41	255	KHAN MUHAMMAD	USMAT SHAH	SPST	GPS TIKHAI PAYEEN	GMS KHAN PUR	A.V.P
42	256	KAMAL KHAN	MUHAMMAD ROOZ KHAN	SPST	GPS SHONTALA	GHS SHONTALA	A.V.P
43	261	RAHIM ULLAH KHAN	SAID AHMAD KHAN	SPST	GPS KHALL NO.1	GMS RAZGRAM	A.V.P
44	288	ZIA ULLAH	NOOR UL HAQ	SPST	GPS MUNJAI	GHS MUNJAI	A.V.P
45	291	TAJ ZAMIN KHAN	SHAH SHAD	SPST	GPS GUMAGAT	GMS WALO TANGI	A.V.P
46	294	ZAKIR HUSSAIN	HUSSAIN AHMAD	SPST	GPS CHARMANGO	GMS QANDARAY	A.V.P
47	308	HISANUL HAQ	SHAMSUR RAHIM	SPST	GPS BADWAN NO.1	GHS ADAM DHERI	A.V.P
48	322	GRAN BACHA	GUL SHAHZADA	SPST	GPS BANDAGAI	GMS BANDAGAI	A.V.P

*Amir Ullah*

ATTESTED

49	348	SHAH GUL	IZZAT GUL	SPST	GPS MINGAL	GPS MINGAL	A.V.P
50	359	MUHAMMAD QUTAD	HAJAT MOOH UL HAQ	SPST	GPS KHALL NO. 4	GPS KHALL BAR KALAY	A.V.P
51	361	HAJIB AHMAD	SAID BAHADAR	SPST	GPS KHALL NO. 4	GPS KHALL KANDARO	A.V.P
52	362	KHALID JAN	BADSHAH JAN	SPST	GPS KHALL NO. 4	GPS KHALL BAR KALAY	A.V.P
53	363	WAHID SAID	AHMAD SAID	SPST	GPS MANSOOR ABAD	GHSS KHALL	A.V.P
54	372	MUHAMMAD SAID	RAHIM SAID	SPST	GPS DARO	GPS KUMBAR MAIDAN	A.V.P
55	373	BADSHAH MUL HAQ	LALI	SPST	GPS MAYAR NO. 2	GHSS MAYAR	A.V.P
56	374	ISRAR UL HAQ	FAZAL RAHIM	SPST	GPS LAL QILLA NO. 1	GMS KHAN ABAD	A.V.P
57	375	GHULAM QAYUM	GHULAM FAROOQ	SPST	GPS BISHGRAM	GHSS BAGH MAIDAN	A.V.P
58	377	FAYAZ IQBAL	MUHAMMAD WAH KHAN	SPST	GPS TORA TIGA	GHS HAJI ABAD	A.V.P
59	384	HASSAN SHAH	BAHADAR KHAN	SPST	GPS KOTKI DHERAI	GHSS LAL QILLA	A.V.P
60	395	FAQIR GUL	AMIR ZADA	SPST	GPS KOHARAI BALA MALAKAND	GHS KOHARY	A.V.P
61	397	MUHAMMAD JAN	KHANZAD GUL	SPST	GPS HAYASERAI	GHSS HAYA SERAI	A.V.P
62	400	SHAHABUDDIN	BAHADAR JAN	SPST	GPS MANIYAL NO. 1	GMS NIHAZ KOT	A.V.P
63	403	MUHAMMAD YAR	BADSHAH SAROAR	SPST	GPS MAYAR NO. 2	GHSS MAYAR JANDOOL	A.V.P
64	404	RAHAT SAID	SABAR SAID	SPST	GPS RABAT	GMS GANILA	A.V.P
65	405	AZIM ULLAH	RAHMAN ULLAH	SPST	GPS SEHSADA	GMS SHARDA KOHAY	A.V.P
66	407	WASIL KHAN	FAIZ TALAB KHAN	SPST	GPS MARCHANAI MAIDAN	GMS ASHRDGAJ	A.V.P
67	408	MUKAMAL KHAN	KHAN MUHAMMAD	SPST	GPS TARIQO MAJIZ RABAT	GMS ASIGI KALAY	A.V.P
68	409	ASGHAR KHAN	MUHAMMAD HAKIM KHAN	SPST	GPS MASKINI	GHS MASKINI	A.V.P
69	411	SACED ULLAH	YAR MUHAMMAD KHAN	SPST	GMPS WARSAKAY SHARQI	GMS KANDO MACHILA	A.V.P
70	412	MUHAMMAD ZAHIR	NOOR HALIMA	SPST	GPS MULAYAND BANDA	GHS CHIHAR KOT	A.V.P
71	414	TAJ MUHAMMAD	ABDUL HAKIM	SPST	GPS MIANI KALAY	GHSS MIAN KALAY	A.V.P
72	416	RAHAT ULLAH	SHAHRAZ KHAN	SPST	GPS KOTKI DHERAI	GMS KUMBAR MAIDAN	A.V.P
73	417	AHMAD SHAH	SULTAN MUHAMMAD	SPST	GPS JAWZO	GHS JAWZO	A.V.P
74	418	KHAN ZEB	FARIDOH KHAN	SPST	GPS SHEGAI ATRAFI	GMS BABA GAM	A.V.P
75	419	ISRAR ALAM	GUL AJDAR	SPST	GPS PALOSO	GMS KOTO	A.V.P
76	420	MUHAMMAD NAWAZ KHAN	RASOOL KHAN	SPST	GPS TOOR QILA	GMS ARIFKALAY	A.V.P
77	421	JEHAN ZADA	PACHA	SPST	GPS MANDESH	GMS MANDESH	A.V.P
78	422	AMIR ZADA	GUL AMIN KHAN	SPST	GPS GIHWARGAI	GHS LAJBOOK	A.V.P
79	423	NIKAYAT KHAN	ANWAR KHAN	SPST	GPS MANDISH RABAT	GMS GANILA	A.V.P

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80	440	GHULAM MUHAMMAD	HAJI MUHAMMAD KHAN	SPST	GPS SADO	GMS KOTO	A.V.P
81	448	MUHAMMAD KHAN	HAJI MUHAMMAD KHAN	SPST	GPS KHUNGI	GCMHS TIMERGARA	A.V.P
82	449	NIAZ KHAN	SADAR KHAN	SPST	GPS MANDO	GMS DARMAL BALA	A.V.P
83	457	BAKHT SHAHZADA	KHATIR ULLAH KHAN	SPST	GPS KHARGAI	GMS KAMBAT	A.V.P
84	463	SAEED ULLAH KHAN	ASMAAT ULLAH KHAN	SPST	GPS KASKAY	GMS ADAM DHERI	A.V.P
85	465	SULTANI ROOM	MUHAMMAD SULTAN	SPST	GPS WATTAI	GMS WATO TANGI	A.V.P
86	470	MUHAMMAD KHAN	WAZIR MUHAMMAD NOOR HANID	SPST	GPS CHAKKANGO	GMS CHANDARAY	A.V.P
87	472	LVAQ JAI	NOOR HANID KHAN	SPST	GPS TOOR QILA	GMS TOOR QILA	A.V.P
89	473	SHER NAVAZ	TAJBAR KHAN	SPST	GPS BALODA	GMS DRANGAL	A.V.P
89	474	ALAM ZEB	DILAWAR KHAN	SPST	GPS KAKORNO	GMS MALAKAND	A.V.P
90	475	TAJIB GUL	HAZIB GUL	SPST	GPS RABAT	GMS RABAT	A.V.P
91	476	SATI ULLAH	GHULAM ALI	SPST	GPS SHADAS	GMS CHILAR KOT	A.V.P
92	477	ABDUL LATIF	MUHAMMAD JAMIL	SPST	GPS SAR SHAWILAY	GMS KANDO KACHILA	A.V.P
93	481	SHAH JEMAN	SHAHSHUL KHAN	SPST	GPS KHARAH	GMS SUKRI DHERI	A.V.P
94	482	QASIM KHAN	SHER ZAMAN KHAN	SPST	GPS QUOR NO. 3	GMS OUCHI SHARJI	A.V.P
95	484	ALAM ZEB KHAN	FAZAL AHAD KHAN	SPST	GPS KANDO	GMS KANDO KACHILA	A.V.P
96	485	MUHAMMAD KHAN	SANID UR RAHMAN	SPST	GPS CHAKKARAY	GMS DAPOR BAID KHAN	A.V.P
97	486	MUHAMMAD INZAM	GHULAM ZAHIR	SPST	GPS RANA MANZAI	GMS DALGRAM	A.V.P
98	487	SHAFI ULLAH	ZAHIR MUHAMMAD	SPST	GPS ADO	GMS BARAGAM	A.V.P
99	489	BAKHT KHAN	MUHAMMAD YOUSAF	SPST	GPS BIVANI	GMS BEYALI	A.V.P
100	492	ATTA ULLAH	SHER BAKHAR	SPST	GPS SANGATO	GMS TOPASIN	A.V.P
101	493	ISMAIL	MUHAMMAD YAOUB KHAN	SPST	GPS BAGH	GMS BAGH KANDAN	A.V.P
102	494	ISRAH UL HAQ	SHAU UL HAQ	SPST	GPS KUMBAR	GMS KUMBAR KANDAN	A.V.P
103	496	HAJSHI KHAN	AYAL KHAN	SPST	GPS DRANGAL	GMS DRANGAL	A.V.P
104	499	BAKHT BLAZID	SARDARZ KHAN	SPST	GPS UKAR RAHMATI	GMS NIMAZ KOT	A.V.P
105	501	BAKHT MUHAMMAD	GHAN RAHMAN	SPST	GPS JAWABO	GMS HAWAGI	A.V.P
106	503	MASRUULLAH KHAN	MUHAMMAD ANWAR KHAN	SPST	GPS ZIMDARA	GMS ZAIMDARA	A.V.P
107	504	FAZAL WAHID	ABDUL HAQ JAN	SPST	GPS TAKETM	GMS MAYAR JANDOL	A.V.P
108	505	MIAN GARD JAN	MIAN AGIBAT SHAH	SPST	GPS SHAGAI	GMS ZAIMDARA	A.V.P
109	512	SHAUDDIN	SAID AZAL KHAN	SPST	GPS KASHMI	GMS GUMBATAI	A.V.P
110	513	SHAH MADAR	HAZMAD KHAN	SPST	GPS MIDAI	GMS MADAN BARDAI	A.V.P
111	516	ABD ULLAH	MAJID HABIB UR REHMAN	SPST	GPS MAYAR NO. 1	GMS MAYAR JANDOL	A.V.P

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222	517	HAZAR HUSSAIN	HAZRAT HUSSAIN	SPST	GPS MACHINE KORDINA	GMS MADAN BANDAI	A.V.P
223	521	GUL ZADA	BAKHT RAWAN	SPST	GPS TOOR QILA	GMS TOOR QILA	A.V.P
224	537	MUHAMMAD MUSHAFIQ	BANQAR JAN	SPST	GPS WAHOAT	GMS CHINAR KOT	A.V.P
225	538	TAJBAR HUSSAIN	KACHHOO HUSSAIN	SPST	GPS BAGH NO. 2	GMS SHORSHING	A.V.P
226	540	ASGHAR KHAN	SARDAR KHAN	SPST	GPS GARBAND	GMS ONDESA	A.V.P
227	541	SADIA UL HAQ	MUHAMMAD SHOUAB	SPST	GPS SHABEKAY	GMS GALL MAIDAN	A.V.P
228	543	JAMAL HAYAT	SHER DIL KHAN	SPST	GPS GAL MAIDAN	GMS GALL MAIDAN	A.V.P
229	545	DIA ULLAH	BAKHT BADSHAH KHAN	SPST	GPS GOUR MAIDAN	GMS MAIDAN BANDAI	A.V.P
230	546	MUHTIYAR KHAN	RAJUMAT WALI	SPST	GPS BIYARI	GMS DARNAL BILA	A.V.P
231	548	HAYAT ULLAH	MUHAMMAD IQBAL	SPST	GPS GAL MAIDAN	GMS GALL MAIDAN	A.V.P
232	549	ANWAR UL HAQ	AKHTAR MUNIAR	SPST	GPS GAL MAIDAN	GMS GALL MAIDAN	A.V.P
233	550	USMAN HAYAT	TOH GUL PACHA	SPST	GPS BANDA SOBI RAW MAIDAN	GMS KURSHUNG	A.V.P
234	552	FAJROOHI	DIL DAR KHAN	SPST	GPS TOPASRI MAIDAN	GMS TOPASRI	A.V.P
235	554	IMANBOOB KHAN	NASHTAMANO	SPST	GPS TUDOD DAG	GMS SHAWA	A.V.P
236	557	MUHAMMAD ZAHIR KHAN	ABDUL ATBAR KHAN	SPST	GPS JAN MUHAMMADA	GMS KALIOGAI	A.V.P
237	558	ATTULLAH	MIAN GUL	SPST	GPS MIAN KALI	GMS KALIOGAI	A.V.P
238	559	SAMUL HAQ	ABDUL KHALIQ	SPST	GPS TEMTAI	GMS TEMTAI	A.V.P
239	562	FHALID	SAD BADSHAH	SPST	GPS ARHWARO	GMS TILMERCARA	A.V.P
240	563	MUHAMMAD YOUSAF	HAISTA MUHAMMAD	SPST	GPS TOOR QILA	GMS TOOR QILA	A.V.P
241	564	GHULAM HAQDOO	GHULAM FAQR	SPST	GPS ZARAT TACASHI	GMS GUMBAT TALASH	A.V.P
242	565	SADIB QAN	BACHA WALI	SPST	GPS CHARRARI	GMS KHANI PUR	A.V.P
243	566	HYLAN UL RAHMAN	KHATTAI ULLAH	SPST	GPS RANI	GMS KHANI	A.V.P
244	568	GHULAM FATI	UMAR GUL	SPST	GPS ISLAMI DHARA	GMS HISARAK	A.V.P
245	569	MUSTAFAI FABIR	SHARNOZ KHAN	SPST	GPS TANDA CHINA NO 2	GMS I CHINA	A.V.P
246	570	AKHTAR HUSSAIN	MUHAMMAD HASSAM	SPST	GPS FAND SHAH ANLIDE DARA	GMS ADOO	A.V.P
247	573	ZAHID ULLAH	UMAR KHAN	SPST	GPS ANANGORO ANWAR	GMS ANDHARI	A.V.P
248	574	USSAN ZADA	GUL QANIR	SPST	GPS ANHARI ANWARAI	GMS KHAI ABAD	A.V.P
249	576	HABIB UL HAQ	ABDUL HAQ	SPST	GPS SAHQWALAI PATEL NO 2	GMS SAHQOLA	A.V.P
250	577	ZAHIR SHAH	GUL ZAHAN KHAN	SPST	GPS ASSIGI KALY	GMS ASSIGI KALAY	A.V.P
251	581	KAZALI KHAN	UMAR SARDAR KHAN	SPST	GPS BERAGAM	GMS BERAGAM	A.V.P
252	585	KANISH UL HAQ	SAD ATIF KHAN	SPST	GPS BARCHAND	GMS GUMBATAI	A.V.P
253	586	SHAH KHALID	SADIM MUHAMMAD	SPST	GPS D-THI KASHMIR NO 2	GMS WARSAK	A.V.P
254	593	HAYAT KHAN	PACHAI	SPST	GPS MASROH	GMS MASROH	A.V.P
255	598	ZAHIR HUSSAIN	STANA GUL	SPST	GPS UTALA	GMS SAHQOLA	A.V.P

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146	600	LAYAQ	FAZAL HAKIM KHAN	SPST	GPS JAWZO	GHS CHAKDARA	A.V.P
147	602	ANITE UL HAQ	SAID AHMAD KHAN	SPST	GPS SHAHI KOTO	GHS KADKH	A.V.P
148	606	SANA ULLAH	NOOR UL HAQ	SPST	GPS KHALL NO.2	GHS KHALL KANDARO	A.V.P
149	610	SHAH HUSSAIN	MUHAMMAD GHULAM	SPST	GPS THRAI NO. 1	GHS SHAGO KASS	A.V.P
150	612	ZAFAR HUSSAIN	RAZI GUL	SPST	GPS QAZI ABAD OUCH	GMS WARSAX	A.V.P
151	614	LAYAQ SHAH ALI KHAN	ROSHAN ALI KHAN	SPST	GMS JABAGAI JARGORI	GMS GOSAM	A.V.P
152	616	MALAK SAID	WALI SAID	SPST	GPS BAR JAM MAXHAI	GHS TAKWARO	A.V.P
153	617	BADSHAH HUSSAIN	KHAISTA RAHMAN	SPST	GPS ADO MAIDAN	GHS DALGRAM	A.V.P
154	620	SADAT ULLAH KHAN	AMIR ZAMAN KHAN	SPST	GPS MANAI THIANGI	GHS CHAKDARA	A.V.P
155	621	BACHA HAZIR	SHAH NAZAR KHAN	SPST	GPS KOTIGRAM COLONY	GHS KOTIGRAM	A.V.P
156	622	INSHAN ULLAH	GHAUS UR RAHMAN	SPST	GPS WASAKAY GHARBI	GMS KANDO MACHLA	A.V.P
157	623	JEHAN ZEB	MUSAFAR KHAN	SPST	GPS GIDARO PAYEEN	GMS SHER KHANI	A.V.P
158	624	IUMA SAID	JAHAT GUL	SPST	GPS WARGHAR	GHS STA WARGHAR	A.V.P
159	626	KHADIM ULLAH	ABDUL HAI	SPST	GPS SAM PATAY	GMS BARIKAY	A.V.P
160	629	FAZAL RASHID	SUNIR GUL	SPST	GPS RAQAF	GMS GANILA	A.V.P
161	630	SHAH SAEED	SHEMBIYAR	SPST	GPS RAGHBARI	GMS RAGHBARI	A.V.P
162	632	HAQ HAWAZ KHAN	SHAH TAZAZ KHAN	SPST	GPS ANANGORO KHIVAR	GMS KOTO	A.V.P
163	642	AJMAL KHAN	SHAZ ULLAH KHAN	SPST	GPS DARAMDAL	GHS PATO TALASH	A.V.P
164	646	GHAFOOR HADI	ANIR WAHID	SPST	GPS BIRAND	GHS LARAMI	A.V.P
165	648	HASSANI ULLAH	FAZAL RAHMAN	SPST	GPS DOKRAI	GHS CHINAR KOT	A.V.P
166	650	DILAWAR SAID	KHAISTA RAHMAN PACIA	SPST	GPS ASLO BANDA	GHS MAYAR JANDOOI	A.V.P
167	651	ZAKIR HUSSAIN	SHER ZAMANI	SPST	GPS TAZAGRAM	GMS SHAH ALAM DABA	A.V.P
168	652	SHAHID RASHID	ABDUR RASHID	SPST	GPS RAHMAN ATAD OTITAI	GMS WARSAX	A.V.P
169	653	ABDUL QADUS	MUHAMMAD TARIQ	SPST	GPS HAYASERAI	GHS HAYA SERAI	A.V.P
170	657	RAHAT ULLAH	GUL ROF KHAN	SPST	GPS BALDARA	GMS BANDAGAI	A.V.P
171	658	HISAR AHMAD	GHULAM MUHAMMAD	SPST	GPS BAGH NO. 2	GHS ASDNR	A.V.P
172	662	SHER HASSANI	RAHMAT ALI KHAN	SPST	GPS GUNIBATI	GHS CHINAR KOT	A.V.P
173	663	AMAZ KHAN	DAZR KHAN	SPST	GPS BADWANI NO. 7	GHS BADWANI	A.V.P
174	664	BAZAR JUMAHIR	DILAWAR JAN	SPST	GPS PULA	GMS SHER KHANI	A.V.P
175	665	FAZAL ASHIR KHAN	KHAN MUHAMMAD	SPST	GPS GHUZANO BANDA	GMS ASGI KALAY	A.V.P
176	666	ISATULLAH	ISAYATULLAH	SPST	GPS SHAH BANDAI	GMS SHER KHANI	A.V.P

*Amir Ullah*

ATTESTED

177	572	BASHIR UL AHAD	FAZAL AHAD	SPST	GPS FAZAL MALIK KORONA	GHS CHINAR KOT	A.V.P
178	574	ZEHAN NASEER	QADAR GUL	SPST	GPS SHIVA TINDO DAG	GHS SHAN ALAM DABA	A.V.P
179	575	INSAN ULLAH	MUHAMMAD WAHAB	SPST	GPS MASHIN KORONA	GHS DARAWAL PAYEEN	A.V.P
180	576	INAM ULLAH	SHARIF ULLAH KHAN	SPST	GPS KHONA PICKAT	GHS MUNDA	A.V.P

**TERMS AND CONDITIONS:**


1. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
2. Their services shall be terminated at any time, in case their performance is found unsatisfactory. In case of misconduct, they shall be proceeded under the rules framed from time to time.
3. NO TA/DA will be paid to them on joining the post.
4. Charge reports should be submitted to all concerned.
5. Drawing & Disbursing Officers concerned are directed to collect photo copies of their testimonials along with verification fees and submit the same to the office of the undersigned for further verification from the institutions concerned.
6. This order is issued, errors and omissions accepted, as a notice only.
7. 60 % candidates have been promoted from amongst the eligible PSHTs.
8. They will give an under taking to be recorded in their service books to the effect that if any over payment is made to them in the light of this order, will be recovered and if some one is found wrongly promoted he will be reversed.
9. All SDEOs male concerned are directed to relieve them of immediately and LPCs and Service books may be completed and handed over to them.
10. No refusal will be allowed as each and every one has been contacted and obtained his consent in advance.

(Muhammad Ibrahim)  
 District Education Officer (M)  
 District Dir Lower

Endst. No. 10446-50 Dated Timergara the 26/08/2017.

Copy of the above is forwarded to:

1. The Director (E&SE) Khuber Pakhtoon Khwa Peshawar.
2. The District Accounts Officer Dir Lower.
3. The Principals / Headmaster of the institute concerned.
4. The Officials concerned.

  
 District Education Officer (M)  
 District Dir Lower

ATTESTED



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Line	Item	Quantity	Unit	Price	Total	Notes
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No	Name of School	Name of Teacher	Exposure	Grade	IP1	IP2	Academic Qualif.	Min. Duration	Prof. Qualif.	D/O Birth	D/O 1st Appn. in Edu. Deptt.	D/O First Appn. As teacher in the Deptt.	Date of Promotion, if any	Remarks	Remarks
455	GMS BUCYAKAI	Yifan Eshin	Burhanuddin	Outlower	15			3ND		20-03-1988	31-03-1988	20-05-2014	20-05-2014		
456	GMS MUYAND BANJOA	Indah Akbar	Orer Kholidar							20-03-1988		30-04-2014			
457	GMS LINDA	Yusuf Ulika	Tajibul Kham							17-06-1987		30-04-2014			
458	GMS GULI KASIAN	Zahar Ulika	Abdulrah							17-04-1985		30-04-2014			
459	GMS SIND KANG	Wahid Zaki	Yusuf Zaki							09-08-1985		30-04-2014			
460	GMS DPAUL	Wahid Zaki	Yusuf Zaki							18-05-1987		30-04-2014			
461	GMS MASYUNI	Wahid Ulika Khan	Wahid Ulika Khan							02-05-1987		30-04-2014			
462	GMS DANIAR	Mahmudul Rohman	Oranger Adhison							11-11-1988		30-04-2014			
463	GMS WAKAS	Indah Wahid	Oranger Adhison							01-03-1988		30-04-2014			
464	GMS NIMAZ KOTI	Mahmudul Rohman	Oranger Adhison							03-01-1989		30-04-2014			
465	GMS GUA MUDOM	Muhammad Saifi	Muhammad Saifi							26-09-1985		30-04-2014			

ATTACHED



19

S. No	Name of Soldier	Rank	Regiment	Grade	Age	Religion	Education	Service	Remarks	Signature	Date
533	GHS Sangolli	Spry Lt/Hq	Muhammed Shah	Dr. Lower	15	ZND		05-12-2014	05-12-2014		
534	GHS Mahan KAR	Muhammed Atal	Mahmood	Dr. Lower	15	ZND		05-12-2014	05-12-2014		
535	GHS Lalhok	Muhammed Zaid	Amroz Khan	Dr. Lower	15	ZND		05-12-2014	05-12-2014		
536	GHS Bumbhat	Abdullah	Sid Mubsh	Dr. Lower	15	ZND		05-12-2014	05-12-2014		
537	GHS Shorshing	Muhammed Fazi	Sheer Atal Khan	Dr. Lower	15			05-12-2014	05-12-2014		
538	GHS Chmarlot	Yazid Khan	Nayim Khan	Dr. Lower	15	ZND		05-12-2014	05-12-2014		
539	GHS Manda	Gulshan Qadir	Jalal Khan	Dr. Lower	15	ZND		05-12-2014	05-12-2014		
540	GHS To Qila	Hussain Muhammad	Tor Muhammad	Dr. Lower	15	ZND		05-12-2014	05-12-2014		
541	GHS Zambora	Shah Muzaffer Khan	Shah Zaid Khan	Dr. Lower	15	ZND		05-12-2014	05-12-2014		
542	GHS Dhert Kashmir	Uzma Ghsaid	Muhammed Youaf	Dr. Lower	15	ZND		05-12-2014	05-12-2014		
543	GHS Manyal	Ahmed Sher	Moh Noor Hassan	Dr. Lower	15	SR		05-12-2014	05-12-2014		
544	GHS Kharwal	Bahar Amin	Muhammed Amin	Dr. Lower	15	ZND		05-12-2014	05-12-2014		
545	GHS Mirgan	Imad Hussain	Bacha Said	Dr. Lower	15	ZND		05-12-2014	05-12-2014		
546	GHS Shorshing	Ahmad Hussain	Sayed Muhammad	Dr. Lower	15	ZND		05-12-2014	05-12-2014		
547											

ATTESTED

*[Signature]*



OFFICE OF THE  
DISTRICT EDUCATION OFFICER (MALE)  
Dir Lower (Phone # 0945 9250081-82)

20

Answer "D"

**NOTIFICATION.**

In pursuance of Section-3 of the Khyber Pakhtunkhwa Employees of Elementary & Secondary Education Department (Appointment & Regularization of Services) Act, 2017, read with section-1 sub-section-(2) of the Act ibid and Law Department Government of Khyber Pakhtunkhwa advice bearing No. ALD-III/Legis:1(4)2017/Vol-1/0888-90 dated 20.03.2017 & Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department Notification No. SO(S/F)E&SED/3-2018/SITT/Contract, services of the following Certified Teachers (CTs) are hereby regularized in BPS-15 with effect from the date of their initial appointment.

Sr	Name	Father Name	Name of School	D.O.B	Score	Appointment order No and dated
1.	Ihtisham Ul Haq	Ahmad Ul Haq	GMS Koorshung	07/11/1989	139.21	Endst No: 6696/CT/Appointment/Ad hoc/NTS dated: 30.04.2014
2.	Lal Zada	Sher Zada	GHS WATANGI	16/01/1985	137.59	Endst No: 6696/CT/Appointment/Ad hoc/NTS dated: 30.04.2014
3.	Latifur Rahman	Khair Zaman	GHS TAKORO	15/03/1989	137.02	Endst No: 6696/CT/Appointment/Ad hoc/NTS dated: 30.04.2014
4.	Misbahur Rahman	Esa Khan	GHS SHORSHING	02/02/1990	135.06	Endst No: 6696/CT/Appointment/Ad hoc/NTS dated: 30.04.2014
5.	Aziz Ullah Jan	Ahmad Jan	GMS NAWAGAI ASBANR	05/11/1984	134.63	Endst No: 6696/CT/Appointment/Ad hoc/NTS dated: 30.04.2014
6.	Irfan Uddin	Burhan Uddin	GMS BUCHAKAI	20/03/1988	133.6	Endst No: 6696/CT/Appointment/Ad hoc/NTS dated: 30.04.2014
7.	Bakht Munir	Sher Bahadar	GMS MULYANO BANDA	17/06/1987	132.96	Endst No: 6696/CT/Appointment/Ad hoc/NTS dated: 30.04.2014
8.	Inayat Ullah	Tajber Khan	GMS Undisa	17/04/1989	132.81	Endst No: 6696/CT/Appointment/Ad hoc/NTS dated: 30.04.2014
9.	Zakir Ullah	Abdullah	GMS Gall Maidan	09/08/1985	130.28	Endst No: 6696/CT/Appointment/Ad hoc/NTS dated: 30.04.2014
10.	Waheed Zada	Noor Zada	GHS Shal Kandi	10/05/1989	130.21	Endst No: 6696/CT/Appointment/Ad hoc/NTS dated: 30.04.2014

ATTESTED

(21)

Sr	Name	Father Name	Name of School	D.O.B	Score	Appointment order No and dated
11.	Muhammad Israr	Jehan Bahadar	GMS DHALL	02/05/1987	129.93	Endst No: 6696/CT/Appointment/Ad hoc/NTS dated: 30.04.2014
12.	Majeed Ullah Khan	Waheed Ullah Khan	GHS MASKINI	11/11/1988	129.62	Endst No: 6696/CT/Appointment/Ad hoc/NTS dated: 30.04.2014
13.	Mehmoodur Rahman	Saeedur Rahman	GHS Dantal	01/03/1988	129.32	Endst No: 6696/CT/Appointment/Ad hoc/NTS dated: 30.04.2014
14.	Irshad Mehmood	Ghani Muhammad	GMS KAKAS	02/04/1989	129.11	Endst No: 6696/CT/Appointment/Ad hoc/NTS dated: 30.04.2014
15.	Muhammad Shahid	Mahboob Zada	GMS NIMAZ KOT	26/09/1986	129.02	Endst No: 6696/CT/Appointment/Ad hoc/NTS dated: 30.04.2014
16.	Muhib Ullah	Muhammad Zahir	GHS MIRAKAI	20/03/1990	129.83	Endst No: 13707-10/CT/Appointment/Ad hoc/NTS dated: 20.10.2014
17.	Rahat Ullah	Bakht Rawan	GMS GHURA BANDA	01/04/1987	110.92	Endst No: 13457-60/CT/Appointment/Ad hoc/NTS dated: 20.10.2014
18.	Iftikhar Khan	Muhammad Rasool Khan	GMS KOTKAI SHAHI KHEL	15/03/1989	133.15	Endst No: 1369-73/CT/Appointment/Ad hoc/NTS dated: 28.02.2015
19.	Muhammad Badshah	Rahman Said	GMS Topasin	03/02/1988	130.81	Endst No: 1369-73/CT/Appointment/Ad hoc/NTS dated: 28.02.2015
20.	Bakht Jamal	Momin Khan	GMS Topasin	01/03/1986	130.6	Endst No: 1369-73/CT/Appointment/Ad hoc/NTS dated: 28.02.2015
21.	Waqos Ahmad	Umar Khaliq	GMS BARIMKAI	26/03/1989	129.91	Endst No: 1369-73/CT/Appointment/Ad hoc/NTS dated: 28.02.2015
22.	Safullah	HABIBULLAH	GHS MASKINI	04/10/1991	127.85	Endst No: 1369-73/CT/Appointment/Ad hoc/NTS dated: 28.02.2015
23.	Shahid	Alam Zeb	GHSS Gumbal Banda	10/07/1991	127.34	Endst No: 1369-73/CT/Appointment/Ad hoc/NTS dated: 28.02.2015
24.	Abdul Haleem Siddiqi	Muhammad Tahir	GMS NIMAZ KOT	09/03/1986	127.32	Endst No: 1369-73/CT/Appointment/Ad hoc/NTS dated: 28.02.2015
25.	Zakir Ullah	Nowshad Khan	GHS Shal Kandi	01/04/1989	127	Endst No: 1369-73/CT/Appointment/Ad hoc/NTS dated: 28.02.2015
26.	Israr Khan	Amir Dost Khan	GMS WALOTANGI	12/02/1991	126.15	Endst No: 1369-73/CT/Appointment/Ad hoc/NTS dated: 28.02.2015

2014

ATTACHED  
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No	Name	Father Name	Name of School	D.O.B	Score	Appointment order No and dated
251.	SHER MUHAMMAD	MUKHTIAR KHAN	GHS ASHARKOR	02/01/1978	106.93	Endst No: 7911-7921/CT/Appointment/Ad hoc/NTS dated: 16.06.2017
252.	Israr Bahadar	Muhammad Azool Khan	GHS-Palo Talash	01/07/1982	101.05	Endst No: 7928-40/CT/Appointment/Ad hoc/NTS dated: 16.06.2017
253.	HANIF ULLAH	Muhammad Naeem	GMS Sarai Payeen	03/02/1984	98.67	Endst No: 7928-40/CT/Appointment/Ad hoc/NTS dated: 16.06.2017

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### TERMS & CONDITIONS

1. Their services shall be governed by the Khyber Pakhtunkhwa Civil Servants Act, 1973, the Khyber Pakhtunkhwa (Appointment, Deputation, Posting & Transfer of Teachers, Lecturers, Instructors & Doctors) Regulatory Act, 2011, and such rules and regulations as may be issued from time to time by the government.
2. Their pay shall be released subject to verification of academic documents/testimonials from the concerned Board/University by the District Education Officer Concerned.
3. Their services shall be considered regular and they shall be eligible for pension/deduction of GP fund in terms of the Khyber Pakhtunkhwa Civil Servants Act, 1973 as amended in 2013.
4. Their services are liable to termination on one month prior notice from either side. In case of resignation without notice, their one month pay/allowances shall be forfeited to the Government treasure.
5. They shall possess the same qualification and experience required for a regular post.
6. They shall have not resigned from their services or terminated from services on account of misconduct, inefficiency or any other ground before commencement of this ACT. The DDO concerned should ensure this condition before the drawal of their pay as regular servants.
7. Their regularization shall not affect the promotion quota of existing holders of posts in respective service cadres.
8. They shall rank junior to all other employees belonging to the same cadre who are in service on regular basis on the commencement of this Act and shall also rank junior to such other persons if any, who, in pursuance of the recommendation of the Khyber Pakhtunkhwa Public Service Commission made before the commencement of this ACT are to be appointed to the cadre, irrespective of their actual date of appointment.
9. Their seniority shall be determined on the basis of their continuous service in cadre, provided that if the date of continuous service in the case of two or more employees is the same, the employees older in age shall rank senior to the younger one.
10. Errors and omissions will be acceptable within the specified period.

(Hafiz Dr. Muhammad Ibrahim)  
District Education Officer (Male)  
Dir Lower at Timergara.

ATTESTED

*[Signature]*

*[Signature]*

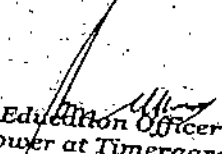


Idet: No. 2978-88

Dated Timergara the 07/03/2018.

23

- Copy forwarded for information and necessary action to the:-
1. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
  2. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
  3. District Nazim Dir Lower.
  4. Deputy Commissioner Dir Lower.
  5. District Accounts Officer Dir Lower.
  6. Dy: District Education Officer Dir Lower.
  7. Principal/Headmaster concerned.
  8. The B&AO Local Office.
  9. The candidates concerned.
  10. Master File.

  
District Education Officer (Male)  
Dir Lower at Timergara.

ATTESTED  


Better copy E 24

OFFICE OF THE DISTRICT EDUCATION OFFICER (M)  
DISTRICT DIR LOWER

Dated: 23/10/2019

To

The Director  
Elementary and Secondary Education

SUBJECT: SENIORITY LIST OF NTS TEACHERS 2014

Respected

Reference your good office telephonic message i.e from phone No. 091-9225344 dated 23/10/2019 at 2:36 PM on the subject cited above.

"It is requested that according to the notification No: SO(S/F) E&SED/3-2/2018 STTI / Contract dated 16/02/2018 wherein it is stated at point No. h they shall rank junior to all other employees belonging to the same cadre who are in service on regular basis on the commencement of this act and shall also rank junior to such other persons if any, who, in pursuance of the recommendation of the Khyber Pakhunkhwa Public Service Commission made before the commencement of this act are to be appointed to the cadre irrespective of their actual date of appointment"

Therefore it is requested that this office may be guided please that whether NTS appointee in 2014 may be kept in the bottom from the other promotes or otherwise.

District Education Officer Male  
Dir Lower at Timergara

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Annexure E

OFFICE OF THE  
DISTRICT EDUCATION OFFICER (M)  
DISTRICT DIR LOWER

Fax. No. 09985-9250001  
9250002

www.education.gov.pk @DCOMaleDirLower District Education Officer Male Dir Lower

Dated Timergara the 23/10/2019

The Director  
Elementary and Secondary Education  
District Dir Lower, Timergara

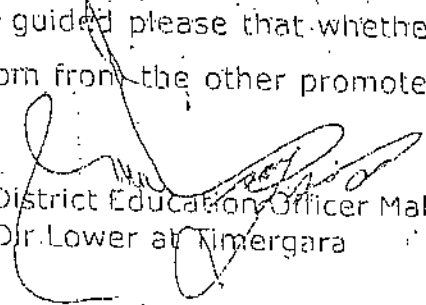
SENIORITY LIST OF NTS TEACHERS 2014

Reference your good office telephonic message i.e from phse No. 001-0275374 dated 23/10/2019 at 2:36 PM on the subject cited above.

It is requested that according to the notification No. SO(S/F) E&SED/3-2/2018 SPT /Contract dated 16/02/2018 wherein it is stated that at point No. h

"they shall rank junior to all other employees belonging to the same cadre who are in service on regular basis on the commencement of this act and shall also rank junior to such other persons if any, who, in pursuance of the recommendation of the Khyber Pakhtunkhwa Public Service Commission made before the commencement of this act are to be appointed to the cadre irrespective of their actual date of appointment".

Therefore it is requested that this office may be guided please that whether NTS appointee in 2014 may be kept in the bottom from the other promotes or otherwise.

  
District Education Officer Male  
Dir Lower at Timergara

ATTESTED



25  
Annexure F

To,

The Director (E&SE) Department,  
Khyber Pakhtunkhwa, Peshawar.

**SUBJECT:** **DEPARTMENTAL APPEAL AGAINST THE SENIORITY LIST OF C.T CIRCULATED ON 26.10.2019**

R.Sir,

Most humbly it is stated that I was initially appointed as PST (BPS-7) now BPS-12. During service I was promoted to the post of Certified Teacher (BPS-15) vide office order dated 26.8.2017. Consequently I submitted my charge report and started my duty as C.T Teacher quiet efficiently and up to the entire satisfaction of my superiors.


Recently the District Education Officer (M), Dir Lower seniority list for the cadre of C.T (BPS-15) whereby my name has totally been ignored by the competent authority while those NTS teachers who have been appointed as adhoc/contract C.T teachers in the year 2014 and were regularized vide office order dated 7.3.2018 were allowed seniority from the date of contractual appointment i.e w.e.f 2014.

The seniority list issued by the District Education Officer (M) Dir Lower is against the section-8 of the Civil servant Act, 1973 as well as against the appointment, promotion and transfer rules, 1989.

It is therefore most humbly prayed that the impugned seniority list date 26.10.2019 may very kindly corrected to the extent of inclusion of name at the right position and also to the extent of allowing seniority to the NTS teacher from the date of regularization i.e w.e.f 7.3.2018 and not from the date of initial contract employment i.e 30.4.2014.

Dated: 11.11.2020

Obediently Yours,

  
Fazal Akbar, CT (BPS-15),  
GHSS ouch, District Dir Lower

**VAKALATNAMA**

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

\_\_\_\_\_ OF 2021

Fazal Akbar

(APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

**VERSUS**

Education Deptt

(RESPONDENT)  
(DEFENDANT)

I/We Fazal Akbar

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, ADVOCATE, PESHAWAR**, 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. \_\_\_\_/\_\_\_\_/2021

AK

**CLIENT(S)**

**ACCEPTED**

**NOOR MOHAMMAD KHATTAK**  
**15401-0705985-5**  
**BC-08-0853**

**AFRASIAB KHAN WAZIR**

**KAMRAN KHAN**

**&**

**SHAHZULLAH YOUSAFZAI**  
**ADVOCATES**

OFFICE:

Plot No.4, 2<sup>ND</sup> Floor,  
Plaza near (FATA) Secretariat  
Peshawar.

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

**SERVICE APPEAL NO. 3916/2021.**

**MR. Fazal Akbar**

.....Appellant

**VERSUS**

1. The Government Khyber Pakhtunkhwa through Secretary Elementary and secondary Education at Peshawar.
2. Director (Elementary & Secondary Education), Khyber Pakhtunkhwa Peshawar.
3. District Education Officer (Male) Dir lower at Timergara.

(RESPONDENTS)

**PARA WISE COMMENTS ON BEHALF OF RESPONDENTS, 1,2.and 3.**

**RESPECTFULLY SHEWETH:**

**PRELIMINARY OBJECTIONS:**

1. The appellant has got no locus standi or cause of action to file the instant appeal.
2. The appellant has concealed the material fact from this Hon! Able Tribunal, hence liable to be dismissed.
3. The appellant has not approached this Honorable Tribunal with clean hands.
4. The appellant has filed the instant appeal on malafide motives.
5. The instant appeal is against the prevailing laws & rules.

**ON FACTS.**

1. This para pertaining to the appellant hence need no comments.
2. Pertains to record.
3. Incorrect. No one is ignored. All the teachers are placed in proper place in seniority list including the appellant as per Government policy. The appellant was promoted to CT cadre on 26.08.2017 and has been awarded seniority from that very date. It is further stated that the teachers appointed through NTS on adhoc basis, have been regularized from the date of appointment and they have all the rights, what a civil servant has.
4. The mentioned letter is just a routine correspondence between the subordinate offices with high ups.
5. This para pertains to record.
6. The appellant has got no cause of action to file instant appeal.

**GROUND:-**

- A. The seniority list has been prepared / updated as per Government rules.
- B. Incorrect. Every civil servant has the right to avail the seniority / privileges as per law.

C. As replied above

D. As replied above:

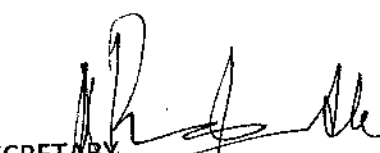
E. The private respondents has been declared as civil servants and has the right to be treated as regular government employ from the date of appointment as mentioned in the act.

F. The appellant availed all the benefits as per law including the private respondents.

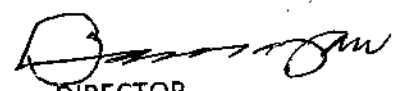
G. Para F may be considered as reply to this para.

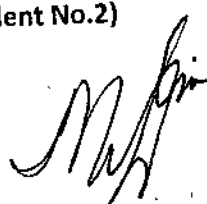
H. The respondent department will, if allowed argue more at the time of hearing.

**It is therefore, humbly prayed that on acceptance of the above submission, the instant Service appeal may very graciously be dismissed in favor of the answering respondents with cost.**

  
SECRETARY  
GOVT: KHYBER PUKHTOON KHWA  
ELEMENTRY AND SECONDARY DEPARMENT  
(Respondent No.1)

SECRETARY  
Education  
Govt of Khyber Pakhtunkhwa

  
DIRECTOR  
ELEMENTRY & SECODARY  
EDUCATION KHYBER PAKHTOON KHWA  
(Respondent No.2)

  
DISTRICT EDUCATION OFFICER (M)  
DIR LOWER AT TIMERGARA  
(Respondent No.3)