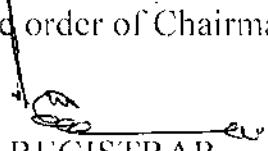


FORM OF ORDER SHEET

Court of _____

Case No. - 290/2023


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	08/02/2023	<p>The appeal of Mr. Ali Akbar resubmitted today by Mr. Noor Muhammad Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <u>10-2-23</u>. Parcha Peshi is given to appellant/counsel.</p> <p>By the order of Chairman  REGISTRAR</p>

The appeal of Mr. Ali Akbar SST GHS No.2 Sakhakot Dargai Malakand received today i.e. on 30.12.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Check list is not attached with the appeal.
- 2- Appeal has not been flagged/marked with annexures marks.
- 3- Annexures are unattested.
- 4- Affidavit is not attested by the Oath Commissioner.
- 5- Index has not been filed.
- 6- Copy of appointment order mentioned in para-1 of the memo of appeal is not attached with the appeal.
- 7- Copy of promotion order dated 22.2.2019 mentioned in para-3 of the memo of appeal is not attached with the appeal.
- 8- Annexures are not in sequence which may be annexed serial wise as mentioned in the memo of appeal.
- 9- Copies of order dated 2.3.2013 and 29.9.2021 are illegible which may be replaced by legible/better one.
- 10- Copy of departmental appeal for grant of M.Phil allowance is not attached with the appeal which may be placed on it. Annexure-F is application for grant of ante dated promotion but not a departmental appeal for grant of M.Phil Allowance.
- 11- Five more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.
- 12- The documents that are to be provided must be illegible/visible.

No. _____/S.T.

Dt. _____/2023


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Noor Muhammad Khattak Adv. Pesh.

R/sis,

- obj No: 1 Attached.
- " 2 Flagged.
- " 3 Attested.
- " 4 Attested.
- " 5 Filed.
- " 6, Attached at Page No: 4.
- " 7, Attached at Page No: 8-10
- " 8, Seryawan.
- " 9. Better copies attached.
- obj 10: it is stated that there were two departmental appeal of the same and with this appeal inadvertently another departmental appeal was attached, which is now clarified/replaced.
- obj No: 11 attached.
- obj No: 12. Better copies attached.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

APPEAL NO. 290 /2023

ALI AKBAR

VS

EDUCATION DEPTT:

INDEX

S. NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of Appeal with Affidavit	1-3
2.	Copy of the appointment order	A	4
3.	Copy of Notification dated 21.02.2013	B	5-7
4.	Copy of the notification	C	8-10
5.	Copies of degrees	D	11-17
6.	Copy of the notification of M.Phil allowance	E	18
7.	Copy of the departmental appeal	F	19
8.	Vakalatnama		20

APPELLANT

THROUGH:


NOOR MUHAMMAD KHATTAK
ADVOCATE SUPREME COURT

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

APPEAL NO. _____/2022

Mr. Ali Akbar SST (BPS-16) (Bio/Chem),
GHS No.2 Şakhakot. Tehsil Dargai, District Malakand.

.....**APPELLANT**

VERSUS

- 1- The Secretary, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 3- The District Education Officer, District Malakand.

.....**RESPONDENTS**

SERVICE APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE INACTION OF THE RESPONDENT DEPARTMENT BY NOT GRANTING THE M.PHIL ALLOWANCE TO THE APPELLANT FROM THE DATE OF ENTITLEMENT AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS.

PRAYER:

That on acceptance of this appeal the appellant may please be granted M.Phil allowance from the date of entitlement. Any other remedy which this Honorable Tribunal deems appropriate may also be awarded in favor of the appellant.

R/SHEWETH:

ON FACTS:

Brief facts giving raise to the instant appeal are as

under:

1- That appellant was initially appointed as CT (BPS-9) now BPS-15 vide order dated 07-10-1989 in the respondents department and is serving the respondents department with zeal and zest and up to the entire satisfaction of his superiors. Copy of the appointment order is attached as Annexure
.....**A.**

2- That through notification dated 21.02.2013 upon the proper recommendation of the Departmental Promotion Committee the appellant has been promoted to the post of SCT BPS-16 and started performing his duty quite efficiently and up to the entire satisfaction of his superiors. Copy of Notification dated 21.02.2013 is attached as Annexure
.....**B.**

- 3- That the appellant was subsequently promoted to the post of SST BPS-16 (Bio/Chem) vide notification dated 22.02.2019. Copy of the notification is attached as AnnexureC.
- 4- That it is worth mentioning here that the appellant was holding M.Phil degree at the time of induction in the Education Department entitling him for the grant of M.Phil allowance. Copies of degrees is attached as Annexure.....D.
- 5- That it is also pertinent to mention here that the said allowance has been granted to other employees of the respondent department but the appellant has been deprived of the same which is highly discriminating. Copy of the notification of M.Phil allowance of other employees is attached as AnnexureE.
- 6- That the appellant time and again approached the respondent department regarding grant of M.Phil allowance but to no avail.
- 7- That the appellant feeling aggrieved from the inaction of the department, preferred departmental appeal but the same has not been decided within the stipulated period of ninety days. Copy of the departmental appeal is attached as Annexure.....F.
- 8- That the appellant feeling aggrieved and having no other remedy filed the instance service appeal on following grounds inter alia.

GROUND:

- A- That the inaction of the respondents by not granting the M.Phil allowance to the appellant is against the law, facts and norms of natural justice.
- B- That appellant has not been treated by the respondents department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That despite the appellant is entitled for grant of M.Phil allowance, the respondent department is reluctant to grant the same without any lawful justification.
- D- That the respondent department acted in arbitrary and malafide manner by not granting the M.Phil allowance to the appellant.
- E- That the act of the respondents is highly discriminative by not granting the M.Phil allowance to the appellant.

F- That the 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.

Dated: 30-12-2023


**APPELLANT
ALI AKBAR**

THROUGH:


**NOOR MUHAMMAD KHATTAK
ASC**


WALEED ADNAN


UMAR FAROOQ


**MUHAMMAD AYUB
ADVOCATES**

AFFIDAVIT

I, Ali Akbar SST (BPS-16) (Bio/Chem), GHS No.2 Sakhakot. Tehsil Dargai, District Malakand, do hereby solemnly affirm that the contents of this **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.


Deponent

"A" 4-

OFFICE OF THE DIRECTOR OF EDUCATION (S) MALAKAND DIVISION SAIDU SHARIF, AT GUL KADA SWAT.

APPOINTMENT.

Mr. Ali Akbar s/o Sahib Shah
resident of Village Kapur District Malakand Agency hereby
temporarily appointed against CT Post at Sam Dargu
in EPS No. 9 of S. 83 P.M. Final plus usual allowances as due
and admissible to him/her under the rules with effect from the date of his/her
taking over charge in the interest of public service subject to the following
terms & conditions:-

- 1- M. T. A./D. A. is allowed.
- 2- Charge report should be submitted to all concerned.
- 3- The appointment is made on purely temporary basis and liable to termination at any time without notice and assigning any reason. In case of resignation he will submit one month's prior notice to the Department and forfeit one month's pay in lieu thereof to the Govt.
- 4- He should be able to produce his/her health and age certificates from the District Hospital concerned in case he/she is not already in service.
- 5- All the conditions are required to check the original academic and professional qualifications of the Candidate before handing over charge to him/her.
- 6- In case the Candidate failed to take over charge within 15 days of the date of taking over, his/her appointment shall stand automatically cancelled.
- 7- The Candidate shall not be handed over charge if his/her age exceed 32 years or below 18 years.

Gulzar
DIRECTOR OF EDUCATION,
MALAKAND DIVISION
AT GUL KADA SWAT.

Encl: No. 31916-21

Dated 7/10 1989.

- 1- Copy forwarded to:-
- 1- The Distt. Education Officer (M) Malakand Agency
- 2- The S.D.B.P. (M) Sam Dargu
- 3- The Headmaster/Headmistress Sam Dargu
- 4- The Candidate concerned.
- 5- The Adviser to Hon. Chief Minister for Edu: NWFP. W/R to his order dated 28.8.89.
- 6- The Special Asstt to the Hon. Chief Minister, NWFP. W/R to his order dated 29.8.89.

for/ M. Sharif
DIRECTOR OF EDUCATION,
MALAKAND DIVISION
AT GUL KADA SWAT.

Tari Mohammad

A



Khyber Pakhtunkhwa Peshawar

PII No. 091-9210989, 9210938,

9210437, 9210957, 9210468

Fax 091-9210936, 0800-33857

E-mail esfi@khyber.gov.pk

"B"

-S-

Notification

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No SO(B&A)/1-18/ASE/2012 dated 11.07.2012 and Finance Department Endorsement No SO(FR)/FD/10-32(E)/2010 dated 16.07.2012, the following Male CTs B-15 are hereby promoted to the post of Senior CT BPS-16 (Rs.10000-500-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and further they will be posted in the Government Higher Secondary /High Schools by the District Education Officers concerned against the newly upgraded Senior CT BPS-16 posts:-

Total No. of CT (B-15) Posts duly verified by the DAO	373
Number of Senior CT Posts	124
Share of promotion 100%	124
Number of posts promoted to the post of Senior CT B-16	01
Number of posts proposed for Promotion	

S.N	S.L. No	Name	Place Of Posting	Date of Birth	Remarks
		Muhammad Khan	GHS Dargai No.1	06/01/1954	Services placed at the disposal of DDO (M) Malakand for further posting.
		Pervez Khan	GHS Pindi	03/08/1962	---Do---
		Muhammad Qadir	GHS Totakai	28/02/1962	---Do---
		Muhammad Memon	GHS Wartair	01/07/1960	---Do---
		Faraz Khan	GHS Hunza Sialkot	01/07/1959	---Do---
		Muhammad Yousaf	GHS Totakai	20/04/1961	---Do---
		Muhammad Khan	GHS Agra	01/10/1959	---Do---
		Faraz Ahmad	GHS Sakhal Kot No.1	02/01/1958	---Do---
		Aslam Khan	GHS Qilangji	19/06/1955	---Do---
		Gul Waris	GHS Inzargal	03/05/1960	---Do---
		Sarfraz Khan	GHS Totai	15/07/1960	---Do---
		Hikmat Khan	GHS Sakhal Kot No.1	25/02/1956	---Do---
		Muhammad Waf	GMS Ghunda Bala	20/08/1959	---Do---
		Muhammad Ali Khan	GHS Sakhal Kot No.1	12/12/1965	---Do---
		Hamid Ullah	GHS Wartair	08/12/1958	---Do---
		Rahim Ullah	GHS Totakai	05/05/1962	---Do---
		Salih Muhammad	GHS Badragaji	30/01/1954	---Do---
		Samballah Khan	GHS Dargai No.2	04/01/1959	---Do---
		Ahmad Wahid	GHS Totai No.1	01/01/1965	---Do---
		Musa Khan	GHS Sakhal Kot No.1	02/12/1952	---Do---

No. of SST Phy-Mat
Share initial merit
Share for Promotion.
Share of promotion &
Posts available for promotion
Proposed for Promotion.

KHYBER PAKHTUNKHWA PESHAWAR

NOTIFICATION

Consequent upon the recommendations of the Departmental Elementary Committee and in pursuance of the Government of Khyber Pakhtunkhwa 11.07.2012 and Finance Department Endorsement No SO(FR)/FD/10-22(E)/2010 dated 16.07.2012, the following Male CTs B-15 are hereby promoted to the post of Senior CT BPS-16 (Rs. 10000-800-3400) plus usual allowances as admissible under the rules on regular basis under the existing policy of the provincial government, on the terms and condition given below with immediate effect and further they will be posted in the Government Higher Secondary / High Schools by the District Education officers concerned against the newly upgraded Senior CT BPS-16 Posts:-

Total No of CT (M) Posts duly verified by the DAO	373
1/3 share of Senior CT Posts	124
Share of Promotion 100%	124
Promoted to the Post of Senior CT B-16	123
Deferred for promotion	01

S No	S.L No	Name	Place of Posting	Date of Birth	Remarks
1.	2	Ihsanullah Khan	GHS Dargai No 1	06.01.1954	Services placed at the disposal of DEO (M) Malakand for further posting
2.	3	Saidul Abrar	GHS Palai	03.08.1962	--Do--
3.	4	Muhammad Qasim	GHS Totakun	28.02.1962	--Do--
4.	5	Badashah Munir	GHS Wartair	01.07.1960	--Do--
5.	6	Farhad Khan	GHS Hero Shah	01.07.1959	--Do--
6.	7	Muhammad Younas	GHS Totakan	20.04.1961	--Do--
7.	8	Munir Khan	GHS Agra	01.10.1959	--Do--
8.	9	Saeed Ahmad	GHS Sakhakot No 1	02.01.1958	--Do--
9.	10	Aslam Khan	GHS Qulangi	19.06.1955	--Do--
10.	11	Gul Wazir	GHS Inzargai	03.05.1960	--Do--
11.	12	Sarfaraz Khan	GHS Totai	15.07.1960	--Do--
12.	13	Hikmat Shah	GHS Sakhakot NO 1	25.02.1956	--Do--
13.	15	Muhammad Wali	GMS Ghundo Bala	20.08.1959	--Do--
14.	16	Muhammad Ali Khan	GHS Sakhakot No 1	12.12.1965	--Do--
15.	17	Hamid Ullah	GHS Wartair	08.12.1956	--Do--
16.	18	Rahim ullah	GHS Totakan	05.05.1962	--Do--
17.	19	Salih Muhammad	GHS Badragga	30.01.1954	--Do--
18.	20	Samiullah Khan	GHS Dargai No 2	04.01.1959	--Do--
19.	21	Abdul Wahid	GHS Thana No 1	01.01.1965	--Do--
20.	22	Musa Khan	GHS Sukhakot No 1	2.02.1962	--Do--

67	69	Muhammad Akbar	GHS Mir Khal	01/01/1968	Do
68	70	Lutfur Rahman	GHS Garhi Usmani Khal	20/01/1968	Do
69	71	Badshah Khan	GHS Palni	01/03/1962	Do
70	72	Muhammad Azam Khan	GHS Sakhatkot No.2	20/02/1965	Do
71	73	Ifkhar Ahmad	GHS Batkhela No.2	01/09/1960	Do
72	74	Muhammad Saleem	GMS Palinda Kasiflora	01/01/1959	Do
73	75	Muhammad Qayum	GHS Inzargai	09/01/1965	Do
74	76	Salim Ahmad	GMS Ghinda Hala	20/03/1958	Do
75	78	Amir Ghazan	GHS Dargai No.1	31/03/1967	Do
76	79	Sheer Bahadar	GMS Ghumar Kalay	09/01/1961	Do
77	80	Usman Ali	GMS Dawa Khal Kil	04/03/1959	Do
78	81	Muhammad Alam	GHS Kot	01/01/1959	Do
79	82	Saleem Khan	GHS Sakhatkot No.1	06/03/1961	Do
80	83	Epraoq Shah	GHS Sakhatkot No.1	03/08/1959	Do
81	84	Jawid Ul Haq	GHS Sakhatkot No.1	28/03/1967	Do
82	85	Haq Nawaz	GHS Sakhatkot No.1	15/01/1954	Do
83	86	Hussain Shah	GHS Kharki Dwart	21/05/1953	Do
84	87	Amir Nawab	GHS Badragga	01/01/1961	Do
85	88	Nasir Ul Wahab	GHS Garhi Usmani Khal	22/06/1961	Do
86	89	Muhammad Aqas	GHS Badragga	03/02/1967	Do
87	90	Fazli Azeem	GHS Thana No.1	02/09/1971	Do
88	91	Atiq Ghaffar	GHS Sakhatkot No.2	06/01/1968	Do
89	92	Ihsan Ul Haq	GHS Sakhatkot No.1	03/01/1970	Do
90	93	Wahab Gul	GHS Kot	04/03/1971	Do
91	94	Jamal	Gems Batkhela	02/01/1965	Do
92	95	Bakht Zamin	Gems Batkhela	18/01/1970	Do
93	96	Muhammad Dawood	GHS Kot (Central)	12/10/1968	Do
94	97	Sheer Bahadar	GHS Gul Muzam	04/08/1967	Do
95	98	Bakht Sultan	GHS Taini	07/02/1968	Do
96	99	Asfandgar	GHS Thana No.1	10/01/1967	Do
97	100	Muhammad Kiaz	Gems Batkhela	03/12/1966	Do
98	101	Rahim Dad Khan	GMS Naray Talgay	01/01/1959	Do
99	102	Iqbal Ullah	Gems Batkhela	01/01/1961	Do
100	103	SARA Ur Rehman	GMS Akbar Abad	17/04/1961	Do
101	104	Said Akbar	GHS Meekhand	02/02/1961	Do
102	105	Rahmat Ullah	GMS Akbar Abad	03/10/1964	Do
103	106	All Akbar	GHS Sakhatkot No.1	19/01/1961	Do
104	107	Muhammad Tahir	GHS Dargai No.1	06/01/1964	Do
105	108	Said Meekhand	GHS Kot	04/12/1965	Do
106	109	Muhammad Asghar	GHS Dheri Aladand No.1	03/03/1965	Do
107	110	Zakaullah	GHS Ce Thana	13/04/1967	Do
108	111	Nasirul Islam	GHS Thana No.1	27/03/1962	Do
109	112	Zahir Shah	GHS Wartsair	01/01/1969	Do
110	113	Fazal Karim	GHS Taini	01/01/1960	Do
111	114	Ihsan Ullah Khan	GHS Nal	04/04/1972	Do
112	115	Lutfullah	GHS Kot	05/08/1970	Do

LIST OF STUDENTS
 of SST Phy-Mat
 Initial Merit
 for Promotion
 of promotion
 tables for promot
 of Promotion

LEGIBLE COPY

67.	69	Muhammad Akbar	GHS Pir Khel	04.01.1963	--do--
68.	70	Lutfur Rahman	GHS Garhi Usmani Khel	20.04.1965	--do--
69.	71	Badshah Khan	GHS Palai	01.03.1962	--do--
70.	72	Muhammad Azam Khan	GHS Sakhakot No 2	20.02.1965	--do--
71.	73	Iftikhar Ahmad	GHS Batkhela No 2	01.09.1960	--do--
72.	74	Muhammad Saleem	GMS Pinda Kandaro	01.01.1959	--do--
73.	75	Muhammad Qayyum	GHS Inzargai	09.01.1956	--do--
74.	76	Salim Ahmad	GMS Ghundo BALA	20.03.1958	--do--
75.	78	Amir Ghazan	GHS Dargai No 1	31.03.1967	--do--
76.	79	Sher Bahadar	GMS Ghawar Kalay	09.01.1961	--do--
77.	80	Usman Ali	GMS Dawa Khan Kili	04.03.1959	--do--
78.	81	Muhammad Alam	GHSS Kot	04.01.1959	--do--
79.	82	Saleem Khan	GHS Sakhakot No 1	06.03.1961	--do--
80.	83	Farooq Shah	GHS Sakhakot No 1	03.08.1959	--do--
81.	84	Javid ul Haq	GHS Sakhakot No 1	28.03.1967	--do--
82.	85	Haq Nawaz	GHS Sakhakot No 1	15.01.1954	--do--
83.	86	Hussain Shah	GHS Kharki Dheri	21.05.1953	--do--
84.	87	Amir Nawab	GHS Budragga	09.01.1964	--do--
85.	88	Noor ul Wahab	GHS Garhi Usmani Khel	22.06.1963	--do--
86.	89	Muhammad Ayaz	GHS Badragga	03.02.1967	--do--
87.	90	Fazli Aleem	GHS Thana No 1	02.09.1971	--do--
88.	91	Mian Ghafoor	GHS Sakhakot No 2	06.03.1968	--do--
89.	92	Ihsan ul Haq	GHS Sakhakot No 1	03.01.1970	--do--
90.	93	Wahab Gul	GHSS Kot	04.03.1971	--do--
91.	94	Jamal	GMHS batkhela	02.01.1965	--do--
92.	95	Bakht Zamin	GHSS Kot (Central)	18.01.1970	--do--
93.	96	Muhammad Dawood	GHS Gul Muqam	12.10.1968	--do--
94.	97	Sher Bahadar	GHS Totai	04.08.1967	--do--
95.	98	Bakht Sultan	GHS Thana No 1	07.02.1968	--do--
96.	99	Asfandyar	Gems Batkhela	10.01.1967	--do--
97.	100	Muhammad Riaz	GMS Naray Tangay	03.12.1966	--do--
98.	101	Rahim Dad Khan	Gems batkhela	01.01.1959	--do--
99.	102	Ikram ullah	GMS Akbar Abad	04.01.1961	--do--
100.	103	S Atta ur rehman	GHS Mekhband	17.04.1961	--do--
101.	104	Said Akbar	GMS Akbar Abad	02.02.1961	--do--
102.	105	Rahmat Ullah	GHS Sakhakot - No 1	03.10.1964	--do--
103.	106	Ali Akbar	GHS Dargai No 1	10.01.1964	--do--
104.	107	Muhammad Tahir	GHSS Kot	06.01.1964	--do--
105.	108	Said Mehmood	GHS Dheri Aladand No 1	04.12.1965	--do--
106.	109	Muhammad Asghar	GHS Ce Thana	03.03.1965	--do--
107.	111	Zakaullah	GHS Thana No 2	13.04.1967	--do--
108.	112	Noorul Islam	GHS Wartair	27.03.1962	--do--
109.	113	Zahir Shah	GHS Tataker	03.01.1969	--do--
110.	114	Fazal Karim	GHS Nal	08.12.1969	--do--
111.	115	Ihsan/Ullah Khan	GHSS Kot	04.04.1973	--do--
112.	116	Lutfullah	GHSS Kot	05.08.1970	--do--

113	117	Zakir Hussain	GHIS Dhari Alindyal No.1	15/04/1962	---Do---
114	118	Muhammad Rehid	GHSS Dhari Julagram	02/06/1972	---Do---
115	119	Zakir Hussain	GHS Palni	15/02/1968	---Do---
116	120	Sajjad Ahmad	GHSS Dhari Julagram	02/04/1968	---Do---
117	121	Arsala Khan	GHIS Thana No.1	16/04/1971	---Do---
118	122	Syed Anwar Shah	GHIS Sakakot No.1	15/04/1959	---Do---
119	123	Jaiangraz Khan	GHSS Khar	10/04/1960	---Do---
120	124	Muhammad Kiaz	GHIS Thana No.1	03/02/1968	---Do---
121	125	Sher Ghani	GHS Keper	04/06/1955	---Do---
122	126	Aurang Zeh	GHS Thana No.1	18/01/1962	---Do---
123	127	Puzli Hadi	GMS Koun Agru	18/03/1960	---Do---

Terms and conditions:-

- 1 They would be on probation for a period of one year extendable for another one year.
- 2 They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 3 Their services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be proceeded under the rules framed from time to time.
- 4 Charge report should be submitted to all concerned.
- 5 Their Inter-Se- seniority on lower post will remain intact.
- 6 No TA/DA is allowed for joining his duty.
- 7 The Govt will give an undertaking to be recorded in their service book to the effect that if on due payment is made to him in light this order will be recovered and if he is promoted he will be reserved.

(Muhammad Rehid) (Signature)

Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

LS 586-72

For information and necessary action to the:

- 1 Accountant General Khyber Pakhtunkhwa Peshawar
- 2 District Education Officers (M) Malakand
- 3 District Accounts Officer Malakand
- 4 Official Concerned
- 5 PS to the Secretary to Govt. Khyber Pakhtunkhwa ESSS Department.
- 6 PA to the Director ESSS Khyber Pakhtunkhwa, Peshawar.
- 7 M/File

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

EST Phy-Mat
Annual Recruitment
Promotion
Promotion
File for promotion
Promotion

LEGIBLE COPY

113.	117	Zakir Hussain	GHS Dher Aladand No. 1	15.04.192	-Do-
114.	118	Muhammad Rashid	GHSS Dheri Julagram	02.06.1972	-Do-
115.	119	Zakir Hussain	GHS Palai	15.02.1968	-Do-
116.	120	Sajjad Ahmad	GHSS Dheri Hulagram	02.04.1968	-Do-
117.	121	Arsala Khan	GHS Thana No 1	16.04.1971	-Do-
118.	122	Syed Anwar Shah	GHS Sakhakot No 1	15.04.1959	-Do-
119.	123	Jehangraz Khan	GHSS Khar	10.04.1960	-Do-
120.	124	Muhammad Riaz	GHS Thana No 1	03.02.1968	-Do-
121.	125	Sher Ghazai	GHS Kopar	04.06.1955	-Do-
122.	126	Aurangzeb	GHS Thana No 1	18.01.1962	-Do-
123.	127	Fazli hadi	GMS Kama Agra	18.03.1960	-Do-

Terms and Conditions:-

1. They would be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. Their Services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be proceeded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their inter-se Seniority on lower post will remain intact.
6. No TA/DA is allowed for joining his duty.
7. They will give an under taking to be recorded in their service book to the effect that if any over payment is made to him in light this order will be recovered and if he is wrongly promoted he will reversed.

(Muhammad Rafiq Khattak)

Director

Elementary and Secondary Education
Khyber Pakhtunkhwa, Peshawar.

Endst No 4586-922/File No 2/Promotion Senior CT B-16 Dated Peshawar the 21.02.2013

Copy forwarded for information and necessary action to the:

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. District Education Officers (M) Malakand.
3. District Accounts Officer malakand.
4. Official Concerned
5. PS to The Secretary to Govt Khyber Pakhtunkhwa E&SE Department.
6. PA to the Director E&SE Khyber Pakhtunkhwa Peshawar.
7. M/File.

Dy: Director (Estab)

Elementary and Secondary Education
Khyber Pakhtunkhwa, Peshawar.

"C"

8-



**Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar**

SSTs (M) Malakand

ADD GUY
PROMOS
1/17

Notification

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No. SO(PS)/4-5/SSRC/Meeting/2019/Teaching Cadre dated 26th July, 2019, the following SCTs/CTs, SDMS/DMs, SATs/ATs, STTs/TTs, Senior Qaris/Qaris, PSHTs/SPSTs/PSTs are hereby promoted to the post of SST (Bio-Chem), SST (Phy-Maths), SST (General) noted against each BPS-16 (Rs. 18910-1520-64510) plus usual increment as admissible under the rules on regular basis under the existing policy of the Government of Khyber Pakhtunkhwa, on the terms and condition given below with immediate effect and subject to the approval of the District Education Officer concerned.

A. SST (Bio/Chem)

PROMOTION OF SENIOR CT/CT TO SST (Bio/Chem), BPS-16	
No. of vacant Posts of SST (Bio-Chem)	07
Share initial recruitment	02
Share for Promotion	05
Share of promotion of SCT/CT	03
Posts available for promotion	03
Proposed for Promotion	01
Recommended for promotion	01
Notified	02

Name	Date of Birth	Date of Appointment	Qualification	Remarks
Mr. [Name]	19/11/1976	11/11/2004	BSc/B.Ed	Services placed at the disposal of DEO (M) Malakand for further posting against SST (Bio-Chem) post.

B. Promotion of PSHT/SPST/PST to SST (Bio/Chem) BPS-16

PROMOTION OF SENIOR PSHT/SPST/PST TO SST (Bio/Chem), BPS-16	
No. of vacant Posts of SST (Bio-Chem)	07
Share initial recruitment	02
Share for Promotion	05
Share of promotion of PSHT/SPST/PST	02
Posts available for promotion	02
Proposed for Promotion	02
Recommended for promotion	02

No.	Name of Officer & Present Place of Posting	Date of Birth	Date of Appointment Regular PST	Qualification	Remarks
563	Munir Khan GPS Shawa Khalay	19/11/1976	11/11/2004	BSc/B.Ed	Services placed at the disposal of DEO (M) Malakand for further posting against SST (Bio-Chem) post.
673	Javed Iqbal GPS No.2 Dargal	12/11/1980	18/7/2011	BSc/B.Ed	do

C. SST (Phy-Maths)

PROMOTION OF SENIOR CT/CT TO SST (Phy-Maths) BPS-16	
No. of SST Phy-Maths (M) Posts vacant Posts	09
Share initial recruitment	02
Share for Promotion	07
Share of promotion of SCT/CT	04
Posts available for promotion	04
Proposed for Promotion	02

←

Mr. [Signature]

DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION
Khyber Pakhtunkhwa Peshawar

NOTIFICATION

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No. SO(PE)/4-5/SSRC/Meeting/2013/Teaching Cadre dated 24th July 2014, the following SCTs/CTs, SDMs/DMs, SATs/ATs, STTs/TTs, Senior Qaris/Qars, PSHTs/PSTs are hereby promoted to the post of SST (Bio-Chem), SST (Phy-Maths), SST (General) noted against each BPS-16 (Rs. 18910-1520-64510) plus usual allowances as admissible under the rules and regular basis under the existing policy of the Provincial Government, on the terms and conditions given below with immediate effect and further they will be posted by the District Education Officer concerned.

A. SST (BIO/CHEM)

1. PROMOTION TO CT/CT to SST (BIO-CHEM) BPS-16

Total No of vacant pots of SST (Bio-Chem)	07
25% share initial recruitment	02
75% share for Promotion	05
40% share of Promotion of SCT/CT	03
Posts available for promotion	03
Proposed for promotion	01
Recommended for promotion	01
Proposed for promotion	02

S. No.	S.L. No	Name of official & present place of posting	Date of Birth	Date of Appoint as Regular PST	Qualification	Remarks
1		Ali Akbar Khan GHSS, Sakhakot	01.10.1964	10.10.1989	MSc/B.Ed	Services placed at the disposal of DEO (M) Malakand, for further posting against SST (BioChem) Post

2. PROMOTION OF PSHT/SPST/PST TO SST (BIO-CHEM) BPS-16

Total No of vacant pots of SST (Bio-Chem)	07
25% share initial recruitment	02
75% share for Promotion	05
20% share of Promotion of PSHT/SPST/PST	02
Posts available for promotion	02
Prepared for promotion	02
Recommended for promotion	02

S. No.	S.L. No	Name of official & present place of posting	Date of Birth	Date of Appoint as Regular PST	Qualification	Remarks
1	503	Umaira Khan GPS Shawa Kalay	19.01.1976	11.11.2004	B.Sc/B.Ed	Services placed at the disposal of DEO (M) Malakand for further posting against SST (BioChem) Post
2	673	Javed Iqbal GPS No 2	12.01.1980	17.07.2011	B.Sc/B.Ed	---Do---

B. SST (PHY-MATHS)

1. PROMOTION OF SCT/CT TO SST (PHY-MATHS) BPS-16

Total No of vacant pots of SST Phy-Maths (M) Posts vacant Posts	09
25% share initial recruitment	02
75% share for Promotion	07
40% share of Promotion of SCT/CT	04
Posts available for promotion	04
Proposed for promotion	02

9-

SSTs (M) Malakand 3

SSTs (M) Malakand 3	
PROMOTION OF PSHT/SPST/PST TO SST (General) BPS-16	
Total No. of vacant Posts of SST (General)	24
Share initial recruitment	06
Share for Promotion	18
Share of promotion of PSHT/SPST/PST	05
Posts available for promotion	05
Proposed for Promotion	05
Recommended for promotion	05

No.	Name of Official Present Place of Posting	Date of Birth	Date of Appointment as Regular PST	Qualification	Remarks
1	B.A/B.L.Ed	Services placed at the disposal of DEO (M) Malakand for further posting against SST (General) post.
2	B.A/B.L.Ed	do
3	B.A/B.L.Ed	do
4	B.A/B.L.Ed	do
5	B.A/B.L.Ed	do

PROMOTION OF SDV/DIV TO SST (General) BPS-16	
Total No. of vacant Posts of SST (General)	24
Share initial recruitment	06
Share for Promotion	18
Share of promotion of SDV/DIV	01
Posts available for promotion	01
Proposed for promotion	01
Recommended for promotion	01

No.	Name of Official Present Place of Posting	Date of Birth	Date of Appointment as Regular AT	Qualification	Remarks
1	M.A/B.Ed	Services placed at the disposal of DEO (M) Malakand for further posting against SST (General) post.

PROMOTION OF SAT/AT TO SST (General) BPS-16	
Total No. of vacant Posts of SST (General)	24
Share initial recruitment	06
Share for Promotion	18
Share of promotion of SAT/AT	01
Posts available for promotion	01
Proposed for promotion	01
Recommended for promotion	01

No.	Name of Official Present Place of Posting	Date of Birth	Date of Appointment as Regular AT	Qualification	Remarks
1	Sarbiland Khan	12/7/1973	14/3/1992	M.A/B.Ed	Services placed at the disposal of

11/11

SSTS(M) Malakand						
S No	S.L No	Name of official & present place of posting	Date of Birth	Date of Appoint. as Regular PST	Qualification	Remarks
1		Mian Ghafdar GHS Sakhakot	06.03.1968	27.04.1992	MA/M.Ed	--do--

2. PROMOTION OF PSHT/SPST/PST to SST (General) BPS-16

Total No of vacant pots of SST General	24
--	----

25% share initial recruitment	06
75% share for Promotion	18
20 % share of Promotion of PSHT.SPST/PST	05
Posts available for promotion	05
Proposed for promotion	05
Recommended for promotion	05

S No	S.L No	Name of official & present place of posting	Date of Birth	Date of Appoint. as Regular PST	Qualification	Remarks
1		Amir Zaman GPS Faisal Abad (Totakan)	04.03.1960	04.11.1979	BA/B.Ed	Services placed at the disposal of DEO (M) Malakand for further posting against SST (General) Post
2		Muhammad Idrees GPS Karwai (Agra)	05.03.1964	10.10.1982	BA/B.Ed	--Do--
3	08	Zahoor Ahmad GPS No 2 Dargai	13.04.1968	01.11.1987	BA/B.Ed	--Do--
4	102	Shauat Ali GOS Ghawar Kalay	10.04.1969	1.11.1987	BA/B.Ed	--Do--
5		Gui	10.09.1966	11.03.1985	BA/B.Ed	--Do--

3. PROMOTION OF SDM/DM TO SST (GENERAL) BPS-16

Total No of vacant pots of SST (General)	24
25% share initial recruitment	06
75% share for Promotion	18
04% share of Promotion of SDM/DM	01
Posts available for promotion	01
Proposed for promotion	01
Recommended for promotion	01

S No	S.L No	Name of official & present place of posting	Date of Birth	Date of Appoint. as Regular PST	Qualification	Remarks
1		Irfan ullah GHS Badragga	30.03.1964	01.12.1988	BA/B.Ed	Services placed at the disposal of DEO (M) Malakand for further posting against SST (General) Post

4. PROMOTION OF SAT/AT TO SST (GENERAL) BPS-16

Total No of vacant pots of SST (General)	24
25% share initial recruitment	06
75% share for Promotion	18
40% share of Promotion of SCT/CT	01
Posts available for promotion	01
Proposed for promotion	01
Recommended for promotion	01

S No	S.L No	Name of official & present place of posting	Date of Birth	Date of Appoint. as Regular PST	Qualification	Remarks
1	8	Sarbiland Khan	12.07.1972	14.05.1992	MA/B.Ed	Services placed at the disposal of

-10-

[Handwritten mark]

SSTs (M) Malakand 4	
GHS Hayyan Kor	DEO (M) Malakand for further posting against SST (General) post.
Promotion of STT/TT to SST (General) BPS-16	
Total No. of vacant Posts SST (General)	24
25% share initial recruitment	06
75% share for Promotion.	18
04% Share of promotion of STT/TT	01
Posts available for promotion	01
Proposed for Promotion	01
Recommended for promotion	01

Sr No	S.I No	Name of Official & Present Place of Posting	Date of Birth	Date of Appoint as Regular TT	Qualification	Remarks
1	11	Muhammad Fayaz GHS. HK	15/6/1976	17/5/1993	MA /B.Ed	Services placed at the disposal of DEO (M) Malakand for further posting against SST (General) post.

Terms and conditions:-

- They would be on probation for a period of one year extendable for another one year.
- They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
- Charge report should be submitted to all concerned.
- Inter-Ser seniority on lower post will remain intact.
- PA/DA is allowed for joining his duty.
- Their services on undertaking to be recorded in their service book to the effect that if any promotion is made to him in light this order will be recovered and if he/she is wrongly promoted he/she will be removed.
- They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- Their posting will be made on Senior based, they will have to serve at the place of posting, and their services is not transferable to any other station.
- Their handover charge once again their document may be checked if they have not the necessary and relevant qualifications as per rules, they may not be handed over charge of the post.

(Hafiz Dr. Muhammad Ibrahim)
Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Order No. 4627-32 / File No. 2/Promotion SST B-16: Dated Peshawar the 22/2/2019
Copy forwarded for information and necessary action to the:-

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

[Signature]
Dy. Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

	GHS HarYan kot				DEO (M) Malakand for further posting against SST (General) Post
--	----------------	--	--	--	---

5. PROMOTION OF STT/IT TO SST (GENERAL) BPS-16

Total No of vacant pots of SST (General)	1	24				
25% share initial recruitment		06				
75% share for Promotion		18				
40% share of Promotion of SDM/DM		01				
Posts available for promotion		01				
Proposed for promotion		01				
Recommended for promotion		01				
S No	S.L No	Name of official & present place of posting	Date of Birth	Date of Appoint as Regular PST	Qualification	Remarks
2	11	Muhammad Fayaz GHS HK	15.06.1970	17.05.1993	MA/B.Ed	Services placed at the disposal of DEO (M) Malakand for further posting against SST (General) Post

Terms and Conditions:-

1. They would be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be preceded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their inter-se-Seniority on lower post will remain intact.
6. No TA/DA is allowed for joining his duty.
7. They will give an under taken to be recorded in their service book to the effect that if any over payment is made to him in light this order will be recovered and if he/she is wrongly promoted he/she will be reversed.
8. They will be governed by such rules and regulations as may be issued from time to time by
9. Their posting will be made on School based, they will have to serve at the place of posting and their service is not transferable to any other station.
10. Before handing over charge once again their document may be checked if they have not the required relevant qualification as per rules, they may not be handed over charge of the post.

(Hafiz Dr Muhammad Ibrahim)
Director

Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst No. 4627-32/File No. 2/Promotion SST B-16 Dated Peshawar the 22.02.2019
Copy forwarded for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. District Education Officer (M) Dir Lower.
3. District Accounts Officer Dir Lower.
4. Official concerned.
5. PS to the Secretary to Govt Khyber Pakhtunkhwa E&SE Department.
6. PA to the Director E&SE Khyber Pakhtunkhwa Peshawar.
7. M/File.

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

Serial No. 00563

IN THE ANIMAL HUSBANDRY UNIVERSITY

ALI ANSAR KHAN

Son of

HAJI SAHIB SHAH

and a student of the B.Sc. (Agriculture) Agricultural University,

having passed all the prescribed examinations,

is this day admitted by the University

to the Degree of

Master of Science Honours in Agriculture

in the FIRST Division

Principal subject AGRICULTURE

Elective subject FIELD PRACTICE

The Examination was taken as a whole/irrespective.

Roll No. 381/1990

Registered No. 83-AGR-11-99

3-6-1999

GET (BPS-101)
QMS Serhanpur
District Malerkotla



Vice-Chancellor

[Signature]
381/1990

Registrar

"D"

SPRINT 2019-2020

P. O. J. B. Agricultural University

ALI AKBAR KHAN

Son of

H. SAHIB SHAH

and a student of the P. O. J. B. Agricultural University, having passed all the prescribed examinations, is this day admitted by the University

-12-

to the Degree of *
Bachelor of Science Honours in Agriculture in the FIRST Division,
with specialization in AGRONOMY

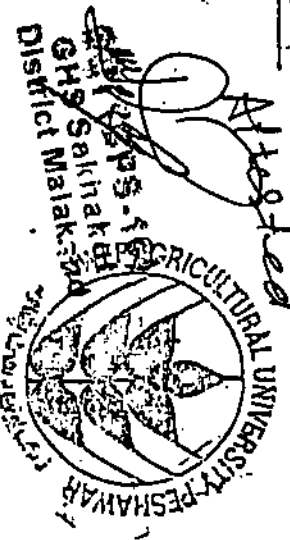
The Examination was taken as a whole/in parts
* 4-YEARS PROGRAMME

Register No. 83-AGR-11-851

Roll No. 301

20-9-19

Assistant Registrar



Vice-Chancellor

EDUCATION DEPARTMENT,

N.W.F.P., PESHAWAR,



CERTIFICATE OF TEACHING.

ROLL NO. 1736 Marks obtained 667/1200/1000
Division Second (II)

-13-

Certified that 414 Akbar Khan,
born on 1-10-1964 (First October, Nineteen hundred and Sixty Four.....)
Son/Daughter of Sahib Shah,
resident of Umar Khan Tehsil Dargal District Malakand.....
having passed the Certificate of Teaching Examination held in 1992 is qualified to teach in the Middle
Department of an Anglo-Vernacular School.
Trained at the Government Training School, Private:.....

Dated 15-11-1992

15-11-1992

Registrar,
Department of Examinations,
Education Department, Peshawar.

[Handwritten Signature]

OCT (BFS-16)
GHS Sakhakot
District Malakand

[Handwritten Signature]
S.H.S. 74



University of Peshawar Pakistan

This certifies that

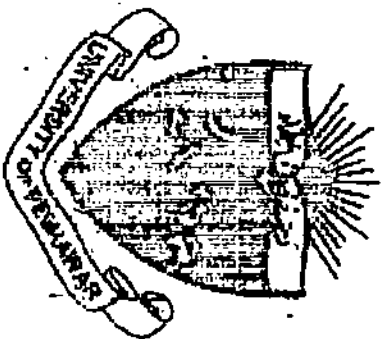
Ali Akbar Khan son of Haji Sahib Shah

having fulfilled all the requirements is hereby admitted to the degree of

Bachelor of Education

and is entitled to all the rights, honours and privileges thereunto appertaining.

Given this 30th day of April, 1997



Attest
QSR (BPS-10)
QNS Bakhrot
District Malakand

[Signature]
Registrar

Roll No. 1250
Session: April 1996
Reg. No. SE-F-46486

11221

[Signature]
Vice-Chancellor

Allama Iqbal Open University
Islamabad



Serial No. A006072

Certified that Mr. / Ms. ALI AKBAR KHAN

Son / Daughter of H SAHIB SHAH

Registration No : 97NMD0466

Roll No: AT626272

having completed the prescribed requirements in semester

SPRING 2014

is awarded the degree of:

MASTER OF EDUCATION (M.ED)

He/She has secured 63 % marks and has been placed in B grade

M. Iqbal

CONTROLLER OF EXAMINATIONS

Result declared on: March 25, 2015

Date of Issue: October 11, 2015



Attested

M. J. Jangir Khan
SCT BPS-18
GHS No.2 Sakhakot

VICE-CHANCELLOR

S. No 129317

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ 16-

Roll No. 3119

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION



Peshawar N.W.F.P. Pakistan
Intermediate Examination

PRE-MEDICAL Group

SESSION 1983 (ANNUAL)

THIS IS TO CERTIFY THAT ALI SHEAR KHAN

Son/Daughter of HAJI SAHIB SHAH

and a resident of MARDAN DISTRICT

Registered No. 6-P/14-80 has passed the *Intermediate Examination* of

the Board of Intermediate & Secondary Education, Peshawar held in May 1983

as a *Private Candidate* He/She obtained 464 Marks out of 1000

and has been placed in Grade D Representing FAIR

The Examination was taken as a whole/in parts.

Mirza
 Asstt. Secretary

7th September, 1983

Ar

This certificate is issued without alteration or erasure

Mirza
 Secretary

S. No 351556

Roll No. 8700

MARKS IMPROVED

اللہ اکبر

-17-

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION



Peshawar N.W.F.P. Pakistan

Secondary School Certificate Examination

Session 1981 (SUPPLEMENTARY)

THIS IS TO CERTIFY THAT ALI AKBAR KHAN
Son/Daughter of H. SAHIB SHAH
and a resident of MARDAN DISTRICT

has passed the *Secondary School Certificate Examination*
of the Board of Intermediate & Secondary Education, Peshawar held in October 1981
as a *Private candidate*. He/She obtained 547 Marks out of 850
and has been placed in Grade B Representing VERY GOOD

The Candidate passed in the following subjects:

- | | | | |
|------------|-----------------|----------------|--------------|
| 1. English | 3. Islamiyat | 5. MATHEMATICS | 7. CHEMISTRY |
| 2. Urdu | 4. PAK. STUDIES | 6. PHYSICS | 8. BIOLOGY. |

Date of birth according to admission form is FIRST OCTOBER

one thousand nine hundred and SIXTY-FOUR (1.10.1964)

ISSUED IN LIEU OF THE CERTIFICATE ROLL No. 29357
S. S. C. EXAMINATION 1980 ANNUAL.

Asstt. Secretary

5th. January, 1982

This certificate is issued without alteration or breach.

Secretary



-18-

"E"

GOVERNMENT OF
KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

No.SO&A)E&SED/1/2021/M.Phil.Allow:539
Dated 29.09.2021

SANCTION

No.SO(B&A)E&SED/1-16/2021/M.Phil.Allowance:- The Government of Khyber Pakhtunkhwa / Competent Authority is pleased to accord sanction to the grant of M. Phil. Allowance @ Rs. 2,500/- (Rupees Two Thousands, Five hundred only) PM with immediate effect in respect of the following staff of E&SE, subject to the observance of all formalities: -

S.#	Name/Designation with name of Institution
1	Mr. Nazir Ahmad CT GHS Prangai Malakand.
2	Mr. Asim Niaz Khan TT GMS Umer Khan Mama Khel Bannu.

I am further directed and to state that the concerned District Account Officers may ensure that the above officers/officials have not been granted advance increments as well as they are not in receipt of Ph.D Allowance as per Finance Department letter No. FD/SO (SR.II) S-14/2016 dated 14.07.2016.

SECRETARY
E&SE DEPARTMENT

Copy of the above is forwarded to the District Accounts Officers Malakand & Bannu.

(MUHAMMAD ISHAQ)
SECTION OFFICER (BUDGET)

Encls: No. & Date even:-

- Copy of the above is forwarded to the:-
1. Secretary to Govt. of Khyber Pakhtunkhwa Finance Department with reference to his letter No. FD/SO (SR.II) S-14/2016 dated 14.07.2016.
 2. Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
 3. DEO (M) Malakand & Bannu.
 4. Principal GHS Prangai Malakand.
 5. Head Master GMS Umer Khan Mama Khel Bannu.
 6. PS to Secretary E&SE Department.
 7. Master File.


SECTION OFFICER (BUDGET)
29/9/21

-19- "F"

To,

The Secretary Elementary & Secondary Education Department,
Khyber Pakhtunkhwa, Peshawar.

Subject:- DEPARTMENTAL APPEAL FOR GRANTING/ALLOWING OF M.PHIL
ALLOWANCE TO APPELLANT

Respected Sir,

The following facts are submitted for perusal and sympathetic consideration:-

That the appellant was initially appointed against the post of Certified Teacher (CT) BPS-9 now BPS-15 vide order dated 7.10.1989. That where after the appellant was promoted to the post of SCT (BPS-16) vide Notification dated 21.2.2013. That right from appointment till date the appellant is serving the Department quite efficiently and up to the entire satisfaction of his superiors.

That vide Notification dated 22.2.2019 the appellant has been promoted to the post of SST (BPS-16) Bio/Chem but with immediate effect. That is pertinent to mention that the appellant acquired the M. Phil Degree in the year 1989 i.e. at the time of induction in the Education Department. That the appellant time and again requested the concerned authority for the grant of M.Phil allowance but of no avail. That in light of the Notification of the Federal Government as well as Provincial Government the appellant is entitled for the grant of M. Phil allowance.

Forgoing in view, it is humbly requested that on acceptance of this departmental appeal the appellant may kindly be allowed M.Phil allowance from the date of entitlement with all back benefits.



Yours obediently,

Ali Akbar SST (BPS-16) Bio/Chem,
GHS No.2 Sakhakot, Tehsil Dargai, District Malakand

No. 2200

31/08/22

VAKALATNAMA
BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

APPEAL NO: _____ OF 2023

Aji Akbar

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Education Deptt

(RESPONDENT)
(DEFENDANT)


I/We Appellant

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

Dated. _____/_____/2023


CLIENT

ACCEPTED


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


KAMRAN KHAN


UMAR FAROOQ MOHMAND


WALEED ADNAN

&


MUHAMMAD AYUB
ADVOCATES

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