



**Form-A**  
**FORM OF ORDER SHEET**

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

Case No.- 968/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	25/07/2019	<p>The appeal of Mr. Abdul Malik presented today by Mr. Amin-ur-Rehman Yousafzai 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 25/7/19</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>06/09/19</u></p> <p style="text-align: right;"> CHAIRMAN</p>
2-		

06.09.2019

Counsel for the appellant present.

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

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

  
Chairman

18.11.2019

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

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

  
Chairman

19.12.2019

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

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

  
Chairman

08.01.2020

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

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

Chairman 

24.01.2020

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

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

  
Chairman

10.02.2020

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

  
Member

24.02.2020

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

  
(Hussain Shah)  
Member

12.03.2020

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

  
(MUHAMMAD AMIN KHAN KUNDI)  
MEMBER

31.03.2020

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

  
Reader

23.06.2020

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

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

  
Member

22.07.2020

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

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

  
(MUHAMMAD JAMAL KHAN)  
MEMBER

12.08.2020


Due to summer vacations case to come up for the same on  
~~15.08~~ 2020 before D.B.

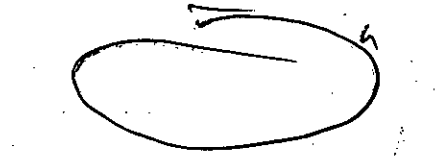
  
Reader

15.10.2020

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

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

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


  
(Muhammad Jamal Khan)  
Member (Judicial)


17.11.2020

Appellant present through counsel.

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

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

  
(Atiq ur Rehman Wazir)  
Member (E)

  
(Rozina Rehman)  
Member (J)

21.08.2020

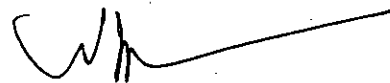
Due to COVID-19 the case is adjourned for the same on 15.10.2020 before D.B.

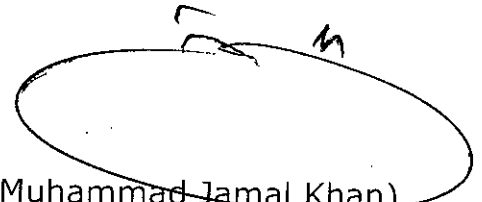
  
READER

15.10.2020

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

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

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


  
(Muhammad Jamal Khan)  
Member (Judicial)


17.11.2020

Appellant present through counsel.

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

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

  
(Atiq ur Rehman Wazir)  
Member (E)


  
(Rozina Rehman)  
Member (J)


09.12.2020

Appellant present through counsel.

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

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

  
(Atiq ur Rehman Wazir)  
Member (E)


  
(Rozina Rehman)  
Member (J)

12.01.2021

Appellant with counsel present.

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

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

  
(Atiq ur Rehman Wazir)  
Member (E)

  
(Rozina Rehman)  
Member (J)



20.01.2021

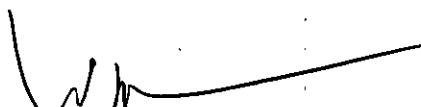
Appellant present through counsel.

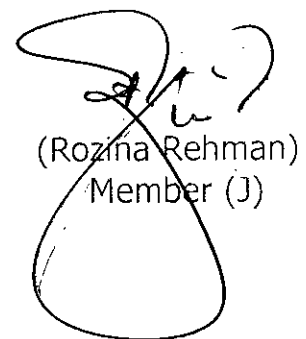
Kabir Ullah Khattak learned Additional Advocate General alongwith Hamid Salim Law Officer, Hayat Khan Assistant Director and Abdul Wahid ADEO for respondents present.

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

Announced.

20.01.2021

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

  
(Rozina Rehman)  
Member (J)

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,  
PESHAWAR

Service Appeal No. 968/2019

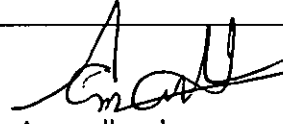
Abdul Malik .....Appellant

....VERSUS....

Govt of Khyber Pakhtunkhwa & 02 others .....Respondents

**I N D E X**

S.No.	Description of documents	Annex	Pages
1.	Service Appeal		1-4
2.	Application for Grant of Status Quo alongwith Affidavit		5-6
3.	Addresses of the parties		7
4.	CNIC	"A"	8
5.	CV	"B"	9
6.	Educational Testimonials	"C"	10-15
7.	Appointment order dated: 06.03.2003 as PTC	"D"	16
8.	Advertisement dated: 26.01.2009	"E"	17-21
9.	Appointment Notification dated: 05.03.2012	"F"	22-25
10.	Adjustment order dated: 07.03.2012	"G"	<del>26-28</del>
11.	Impugned Notification dated: 04.04.2019	"H"	27
12.	Departmental Appeal dated: 16.04.2019 alongwith Diary/Dispatch Number with date.	"I"	<del>28-29</del>
13.	Wakalatnama		30



Appellant

Through

Amin ur Rehman Yusufzai

Sajjad Mehsud

&

Khalid Khan

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

Cell No.0321-9022964, 0333-9981464

Dated: 18.07.2019

1

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

Khyber Pakhtunkhwa  
Service Tribunal  
Service Appeal No. 968/2019

Diary No. 1057

Dated 25/7/19

Abdul Malik S/O Said Muhammad Shah, Ex-SST (Gen),  
R/o Village Nao Kelli, Tehsil Prang Ghar, Tribal District Mohmand.

..... Appellant

....VERSUS....

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

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

NOTIFICATION ENDORSEMENT NO.5652-57, DATED: 04.04.2019 OF RESPONDENT NO.2, VIDE WHICH APPOINTMENT NOTIFICATION DATED: 05.03.2012 ALONGWITH ADJUSTMENT ORDER DATED: 05.03.2012, OF THE APPELLANT, HAS UNILATERALLY BEEN DISOWNED.

Filed to-day  
Registrar  
25/7/19

**PRAYER-IN-APPEAL:**

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

**Respectfully Sheweth:**

1. That appellant is law abiding peaceful citizen of Pakistan and permanent resident of Tribal District Mohmand.  
(Copy of CNIC, is attached as Annexure "A")
2. That appellant obtained Master degree, in the year 2005, from University of Peshawar and having passed PST, CT, B.Ed & M.Ed courses from Elementary Collage Jamrud & Allama Iqbal Open University, Islamabad, respectively.  
(Copies of CV and Educational Testimonials, are attached as Annexure "B" & "C", respectively)
3. That, consequent upon recommendation of the Departmental Selection Committee, appellant was appointed as PTC Teacher, in

Govt community School Lakhaka Kelli, Tribal District Mohmand, vide Office order endorsement No.4993-5089 dated: 06.03.2003.

**(Copy of Appointment order dated: 06.03.2003 as PTC, is attached as Annexure "D")**

4. That respondent No.3, invited applications for numerous vacant positions of SETs/SSTs (BPS-16), vide Advertisement No.01/2009, dated: 26.01.2009.  
**(Copy of Advertisement dated: 26.01.2009, is attached as Annexure "E")**

5. That appellant, being qualified, applied for one of the aforementioned advertised posts of SSTs (BPS-16) and gone through the entire process of selection successfully, eventually he, on the recommendation of KP PSC, was appointed as SST (Gen) BPS-16, on regular basis, vide Notification Endorsement No.955-59/File No.2/A-14/SST/PSC/Apptt: dated: 05.03.2012.  
**(Copy of appointment Notification dated: 05.03.2012, is attached as Annexure "F")**

6. That appellant was subsequently adjusted in Govt Middle School, Jammu, FR Kohat (Merged Area Kohat) i.e. Vacant Post, vide Order dated: 07.03.2012.  
**(Copy of Adjustment order dated: 07.03.2012 is attached as Annexure "G")**

7. That appellant was performing duty with zeal, devotion and outmost satisfaction of the superiors, however he has unilaterally been shunt-out from service, vide impugned Notification dated: 04.04.2019 by respondent No.2, without due process and following the law/rules governing the subject.  
**(Copies of Impugned Notification dated: 04.04.2019, is attached as Annexure "H")**

8. That appellant preferred departmental appeal dated: 16.04.2019 to respondent No.1 which was received vide Diary No. 1001 dated: 16.04.2019, though the statutory period of 03 months has been elapsed, but the authority did not consider the same, one way or the other.  
**(Copies of Departmental Appeal dated: 16.04.2019, alongwith diary/dispatch number with date, is attached as Annexure "I")**

9. That appellant, being aggrieved of impugned notification dated: 04.04.2019 and not considering his departmental appeal by respondent No.1, approaches this Hon'ble Tribunal, inter-alia, on the following grounds:

**GROUND S:**

- A. That impugned Notification dated: 04.04.2019 of respondent No.2 is against the law and facts available on file, hence, untenable.
- B. That the appellant has neither been treated in accordance with law nor he has been provided equal protection of law, rather he has not been provided fair opportunity to defend himself, as enshrined in

Article-10A of the Constitution of Islamic Republic of Pakistan 1973, hence the respondent department acted without jurisdiction.

- C. That neither regular enquiry was conducted into the guilt of the appellant nor he has been served with mandatory Show Cause Notice, hence, condemned unheard, which attracts doctrine of audi-alterm-partem.
- D. That appellant being qualified was appointed after due process of law and fulfilment of all legal/codal formalities, however shunt-out from service with a single stroke of pen, without care and caution of its legal consequences, which has caused grave miscarriage of justice.
- E. That appellant has served the department with zeal, devotion and to the best of his abilities, without affording a single opportunity of complaint, either to the students or their parents or to the superiors, regarding performance of official duties, therefore, the following amongst plethora of Judgments of the apex Court will be attracted.

**I. 2011 SCMR 1581**

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

**II. 2004 SCMR 303**

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

**III. 2016 SCMR 1299**

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

**IV. 2010 PLD SC 483**

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

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

It is, therefore, most humbly prayed that on acceptance of Instant Appeal, the Impugned Notification dated 04.04.2019 of respondent No.2 alongwith Pre and Post proceedings thereto, may be declared as Illegal, Unlawful, without Lawful Authority, void-ab-initio and of no legal effect, hence be set at naught and appellatant may be reinstated in service with all back benefits, in the best interest of justice and equity.

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

*[Handwritten Signature]*

Appellant

Through

**Amin ur Rehman Yusufzai**

**Sajjad Mehsud**

&

**Khalid Khan**

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

Cell No.0321-9022964, 0333-9981464

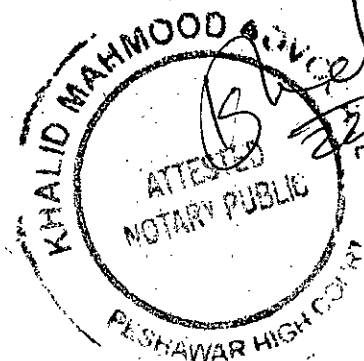
Dated: 18.07.2019

**VERIFICATION:**

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

*[Handwritten Signature]*

Deponent



5

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

C.M No.\_\_\_\_/2019  
In  
Service Appeal No.\_\_\_\_/2019

Abdul Malik.....Appellant

**....VERSUS....**

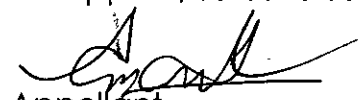
Govt of Khyber Pakhtunkhwa & 02 others .....Respondents

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

Respectfully Sheweth:-

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

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

  
Appellant

Through

**Amin ur Rehman Yusufzai**

  
**Sajjad Mensud**

&

  
**Khalid Khan**

Advocates, Peshawar,  
3-A, Park Avenue, Bhattani Plaza,  
University Town, Peshawar  
Cell No.0321-9022964, 0333-9981464

Dated: 18.07.2019

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

C.M No.\_\_\_\_/2019  
In  
Service Appeal No.\_\_\_\_/2019

Abdul Malik.....Appellant

....VERSUS....

Govt of Khyber Pakhtukhwa & 02 others.....Respondents

**AFFIDAVIT**

I, Abdul Malik S/O Said Muhammad Shah, Ex-SST (Gen), R/o Village Nao Kelli, Tehsil Prang Ghar, Tribal District Mohmand. do hereby solemnly affirm declare on oath that the contents of the accompanying '**Petition**' are true and correct to the best of my knowledge and belief, and that nothing has been kept concealed from this Hon'ble Tribunal.

Identified By:

DEPONENT  
CNIC #: 21407-5019036-1

**Amin-ur-Rehman Yusufzai**  
Advocate, Peshawar



⑦

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

Service Appeal No. \_\_\_\_/2019

Abdul Malik ..... **Appellant**

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

Govt of Khyber Pakhtunkhwa & 02 others ..... **Respondents**

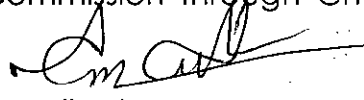
**ADDRESSES OF THE PARTIES**

**APPELLANT:**

Abdul Malik S/O Said Muhammad Shah, Ex-SST (Gen),  
R/o Village Nao Kelli, Tehsil Prang Ghar, Tribal District Mohmand.

**RESPONDENTS:**

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



Appellant

Through

**Amin ur Rehman Yusufzai**

**Sajjad Mehsud**

&

**Khalid Khan**


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

Cell No.0321-9022964, 0333-9981464

Dated: 18.07.2019

ANNEX "A"  
8


حکومت پاکستان  
قومی شناختی کارڈ  
21407-5019036-1



نام: محمد الیاس  
جنس: مرد  
والد کا نام: سید محمد طاہر  
عثمان یوسف حسین  
10/03/1978  
ریجنل ایجنسی  
دستخط: محمد الیاس


دستور کارڈ

شناختی نمبر: 21407-5019036-1  
خاندان نمبر: Y2D855



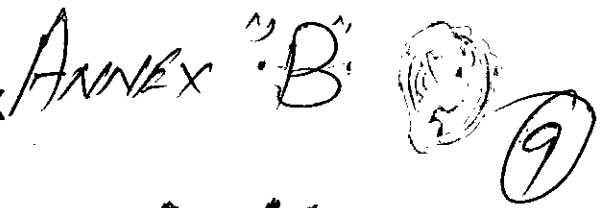
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03/04/2026  
03/04/2016



ATTESTED

BIO DATA  
ABDUL MALIK

ANNEX "B" 

Personal Information:

F/Name: Said Muhammad Shah  
D.O.Birth: 10-03-1978  
CNIC#: 21407-5019036-1  
Domicile: Mohmand Agency  
Postal Add: Vill: Nao Killi, Tehsil Prang Ghar, Distt: Mohmand Agency  
Personal#: 354803  
Cell#: 0346-8002324 0300-9157984

Total Length of Service  
16 years 1 month 6 days.

Service Info:

Post	BPS	D.O.1 <sup>st</sup> app	School
PST	9	06-03-2003	GPS Lakhkar Killi Mohmand Agency
SST	16	07-03-2012	GMS Jammu FR Kohat
Mutual Transfer	16	05-09-2012	GMS Kuz Kadi Mohmand Agency
Joint Transfer	16	12-09-2013	GMS Halki Gandhab Mohmand Agency
SST	16	28-09-2015	GHS Nave Kalli

Academic Qualification:

S.No	Degree/Certificates	Session	Board/University
1	M.A	2005	University Of Peshawar
2	B.A	1999	University Of Peshawar
3	F.A	1997	B.I.S.E Peshawar
4	S.S.C	1994	B.I.S.E Peshawar

Professional Qualification:

S.No	Degree/Certificates	Session	Board/University
1	M.Ed	2017	AIOU Islamabad
2	B.Ed	2008	AIOU Islamabad
3	C.T	2007	Elementary College Jamrod
4	PST	1998	Elementary College Jamrod

  
ATTESTED

ALLAMA IQBAL OPEN UNIVERSITY **ANNEX 3** **CPA**  
PROVISIONAL RESULT CARD

Serial No. 145589

Roll No.

AT622529

Registration No.

06NCA0815

Name **ABDUL MALIK**

Final Semester

SPR-2016

Father's Name **SALD MOHAMMED SEIB**

Address **C/O LAL DIN SHOPKEEPER WAWA KHAN MARKET  
COLLEGE ROAD TANGI P/O SAME**

Tehsil **TANGI**

District **CHARSADA**



has successfully completed **MASTER OF EDUCATION ( M.ED )  
TEACHER EDUCATION**

The detail of passed courses is as under

Semester	Course Code	Title of Courses	Marks	
			Maximum	Obtained
SPR- 13	0831	FOUNDATIONS OF EDUCATION	100	58
SPR- 13	0837	EDUCATIONAL RESEARCH	100	67
SPR- 13	0838	CURRICULUM DEVELOPMENT & INSTRUCTIONS	100	65
SPR- 13	0840	EDUCATIONAL PSYCHOLOGY	100	65
AUT- 15	0826	ELEMENTARY EDUCATION	100	59
AUT- 15	0827	SECONDARY EDUCATION	100	65
AUT- 15	0828	HIGHER EDUCATION	100	63
AUT- 15	0829	TEACHER EDUCATION IN PAKISTAN	100	66
SPR- 16	6505	ISLAMIC SYSTEM OF EDUCATION	100	64
SPR- 16	6507	EDUCATIONAL MEASUREMENT & EVALUATION	100	70
SPR- 16	6552	TEXTBOOK DEVELOPMENT-I	100	62
SPR- 16	6553	TEXTBOOK DEVELOPMENT-II	100	69

Credit Hours 36

Result Declared on MARCH 17, 2017

Date of Issue APRIL 11, 2017

Total Marks/Obtained

1200 / 773

Percentage/Grade

64 / B

**ATTESTED**

*[Signature]*  
Controller of Examinations

**Disclaimer:**

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

(11)

# Allama Iqbal Open University Islamabad



Serial No. 137246

Certified that Mr. / Ms. ABDUL MALIK

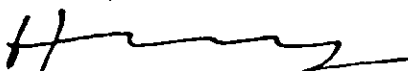
Son / Daughter of SAID MUHAMMAD SHAH

Registration No: 05-NQA-0815 Roll No: U-681049

having completed the prescribed requirements in semester  
AUTUMN 2007 is awarded the degree of:

## Bachelor of Education (B.Ed)

He / She has secured 64 % marks and has been placed in B grade.

  
CONTROLLER OF EXAMINATIONS

Result declared on: July 26, 2008

ISLAMABAD. DATED: February 16, 2010



  
VICE-CHANCELLOR

 ATTESTED

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

# University of Peshawar

(Pakistan)

Session ANNUAL 2005

ABDUL MALIK

Son/Daughter of

SAID MOHAMMAD SHAH

and a student of /private candidate of

FOHMAND AGENCY

having passed the prescribed examination held in

AUGUST, 2005

is this day admitted by the University of Peshawar to the Degree of

## Master of Arts

In

ISLAMIYAT

In

SECOND

Division

The Examination was taken as a whole/~~in parts~~

Serial No. 0068007



Registration No. 97-TI-407

Roll No. 21188

Result Declared on 23RD APRIL, 2007

Registrar

Countersigned

Vice-Chancellor

ATTESTED

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

13

# University of Peshawar (Pakistan)

Session ANNUAL 1999

ADDUL MALIK Son / Daughter of SAID MUHAMMAD SHAH

and a Student / ~~private candidate~~ of GOVT. DEGREE COLLEGE TANGI

having passed the prescribed examination held in JULY 1999

is this day admitted by the University of Peshawar to the Degree of

## Bachelor of Arts

in SECOND Division

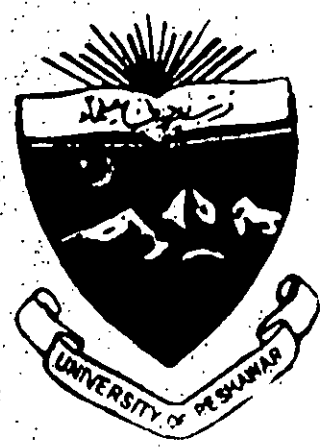
The Examination was taken as a whole / ~~in parts~~

Serial No. 102093

Registration No. 97-11-407

Roll Number 27094

Result declared on NOVEMBER 22, 1999



ATTACHED

Signature  
REG. NO.

Countersigned

Signature

Vice-Chancellor

S. No. PBR- 110539

بیت اللہ

Roll No. 26144

14

**BOARD OF INTERMEDIATE AND SECONDARY EDUCATION**



**Peshawar N.W.F.P. Pakistan**  
**Secondary School Certificate Examination**

**SESSION 1994 (ANNUAL)**  
**(SCIENCE GROUP)**

THIS IS TO CERTIFY THAT Abdul Malik

Son/Daughter of Said Muhammad Shah

and a student of Govt. High School, Vanderi Charsadda

has passed the Secondary School Certificate Examination  
of the Board of Intermediate and Secondary Education, Peshawar held in March 1994.  
as a *Regular candidate*. He/She obtained 517 Marks out of 850  
and has been placed in Grade  Representing Very Good

The Candidate passed in the following subjects.

- |            |                     |                |              |
|------------|---------------------|----------------|--------------|
| 1. English | 3. Islamiyat        | 5. Mathematics | 7. Chemistry |
| 2. Urdu    | 4. Pakistan Studies | 6. Physics     | 8. Biology   |

He/She has been awarded Grade  on the basis of internal  
assessment by the Institution concerned.

Date of birth according to admission form is Tenth March  
one thousand nine hundred and Seventy Eight (10-3-1978)

Assit. Secretary  
4th August, 1994.

Secretary

*This certificate is issued without alteration or erasure.*



ANNEX D

(16)

OFFICE OF THE AGENCY EDUCATION OFFICER MOHMAND AGENCY AT GIBALLANAI  
OFFICE ORDER

Consequent upon the recommendation of the selection committee and nomination of Political Agent Mohmand Agency, vide his office No. 1085-89 Dated. 20/02/2003, the following candidates are hereby appointed against P.T.C. Posts in the community schools under president special development package in Khwaiza / Buzai inaccessible areas in BPS-6 plus Usual allowances as admissible under the rules on contract base for the project period in the schools noted against their names with immediate effect.

S.//	Name of candidate with Father name	School where appointed
1	Mohammad Sliah S/O Musa Yar Khan	C.S Bad Manai Ghafoor
2	Munir Khan S/O Ali Rehman	C.S Sham Shah Yousaf Khan
3	Noor Ullah Khan S/O Moharam Khan	Do
4	Daywood Shah S/O Saadud Din	C.S Shah Mir Kore Khan Abad
5	Qadar Khan S/O Shah Jehan	Do
6	Syyar Khan S/O Amir Zada Khan	C.S Badmanai Gulzar
7	Ajmal Khan S/O Pir Ghulam	C.S Ghair Dhand Akram
8	Fazal-I-Subhan S/O Abdul Latif	C.S Manzari Cheena Faqir
9	Mohammad Israr S/O Mir Zada Khan	C.S Badmanai Ghafoor
10	Abdul Samad S/O Mohammad Rafiq	C.S Lakhkar Kili Gul Wali
11	Abdul Malik S/O Feroz Khan	C.S Landi Shah Zarin
12	Bashir Ahmad S/O Saad Akram	C.S Lakhkar Kili Gul Wali
13	Shad Ali Khan S/O Hasham Khan	C.S Bad Manai Gul Zar
14	Saadullah S/O Haji Dawa Jan	C.S Mama Zai Sekandar
15	Nazir Gul S/O Nawab Khan	Do
16	Zauna Khan S/O Khan Syed	C.S Manzari Cheena Shinwari
17	Tajawal Khan S/O Fazal Mohammad	C.S Jarobai Fazal
18	Ahmad Khan S/O Niaz Din	C.S Masti Kore Gulab
19	Hazrat Shah S/O Saib Jamal	C.S Kung Mehrab Gul
20	Ali Akbar S/O Hazrat Mohammad	C.S Bela Jewara Naik Mohd
21	Sajjad S/O Khanzad Gul	C.S Kung Mehrab Gul
22	Sultan Mohammad S/O Haji Mohammad Shah	C.S Khan Baig Kore Ijazat
23	Haleem Khan S/O Zarif Khan	Do
24	Samar Ahmad S/O Ahmad Gul	C.S Kuzu Kass Ghulam Bashir
25	Daftar Khan S/O Mohammad Akbar	C.S Khan Baig Kore Fazlai Mannan
26	Khaista Zar S/O Ihsanullah	C.S Khan Baig Kore Fazlai Mannan

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26/3/2003

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BETTER COPY

Consequent upon the recommendation of the selection committee and nomination of Political Agent Mohmand Agency vide his office No.1085-89 Dated 20.02.2003, the following candidates are hereby appointed against PTC Posts in the community schools under president special development package in Khwaizai / Bazar in accessible areas in BPS-7 plus Usal allowances as admissible under the rules on contract basis for the project period in the schools noted against their names with immediate effect:

S.No.	Name of candidate with father name	School where appointed
1.	Mohammad Shah S/O Musa Yar Khan	CS Bad Manai Ghafoor
2.	Munir Khan S/O Ali Rehman	CS Sham Shah Yousof Khan
3.	Noor Ullah Khan S/O Mukaram Khan	---do---
4.	Dawood Shah S/O Sadrud Din	CS Shah Mir Kore Khan Abad
5.	Qadar Khan S/O Shah Jehan	---do---
6.	Sayyar Khan S/O Amir Zada Khan	CS Badmanai Gulzar
7.	Ajmal Khan S/O Pir Ghulam	CS Ghair Dhand Akram
8.	Fazli-Subhan S/O Abdul Latif	CS Manzari Cheena Faqir
9.	Mohammad Israr S/O Mir Zada Khan	CS Badmani Ghafoor
10.	Abdul Samad S/O Mohammad Rafiq	CS Lakhkar Killi Gul Wali
11.	Abdul Malik S/O Feroz Khan	CS Landi Shah Zarin
12.	Bashir Ahmad S/O Said Akram	CS Lakhkar Kili Gul Wali
13.	Shad Ali Khan S/O Hassan Khan	CS Bad Manai Gul Zar
14.	Saadullah S/O Haji Dawa Jan	CS Mama Zai Sekandar
15.	Nazir Gul S/O Nawab Khan	---do---
16.	Zaula Khan S/O Khan Syed	CS Manzari Cheena Ghinwan
17.	Tajawal Khan S/O Fazal Mohammad	CS Jarobai Fazal
18.	Ahmad Khan S/O Niaz Din	CS Masli Kore Gulzar
19.	Hazrat Shah S/O Sahib Jamal	CS Kung Mehrab Gul
20.	Ali Akbar S/O Hazrat Muhammad	CS Ucha Jewara Naik Mohammad
21.	Sajjad S/O Khanzar Gul	CS Kung Mehrab Gul
22.	Sultan Muhammad S/O Haji Mohammad Shah	CS Khan Baig Kore Ijazat
23.	Haleem Khan S/O Zariif Khan	---do---
24.	Samar Ahmad S/O Ahmad Gul	CS Kuzu Kass Ghulam Bashir
25.	Daftar Khan S/O Mohammad Akbar	CS Khan Baig Kore Fazlai Manan
26.	Khaista Zar S/O Ihsanullah	CS Khan Baig Kore Fazlai Manan

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16A

S#	Name of Candidate with Fathers Name	School where appointed
27	Jamil Shah S/O Hakeem Khan	C.S Nazar Kore Aslam
28	Aslam Khan S/O Hazrat Mohammad	C.S Ucha Jewara Naik Mohd
29	Mohammad Quraish S/O Mohammad Akbar	C.S Nazar Kore Aslam
30	Mohammad Khan S/O Ghulam Sakhi	C.S Soor Dagi Yaqub Khan
31	Raz Mohammad S/O Shah Rasool	C.S Kaka Kore Hunar Jan
32	Gul Nabe S/O Lal Said	C.S Soor Dagi Yaqub
33	Anwar Shamim S/O Ahmad Gul	C.S Kozu Kass Ghulam Bashir
34	Ghat Zar S/O Khan Said	C.S Sam Ghakhtai Siraj Khan
35	Fida Mohammad S/O Arsala Khan	Do
36	Saz Mohanumad S/O Shah Rasool	C.S Kaka Kore Hunar Jan
37	Niqab Khan S/O Khan Sharif	C.S Kung Sabzali
38	Saddi Khan S/O Mawceez Khan	Do
39	Khyalr Jan S/O Joor Jan	C.S Spinki Tangi Nadar
40	Amir Khan S/O Hamid Khan	Do
41	Shah Nazir S/O Arsala Khan	C.S Spinki Tangi Sikandar
42	Sultan Murad S/O Gula Dad	Do
43	Tahir Ali S/O Gula Khan	C.S Bad Manai Bakht Jamal
44	Mawad Gul S/O Hayat Gul	C.S Toora Khwa Sherin
45	Mohd Raz S/O Zarghun Shah	Do
46	Siyar S/O Dost Mohammad	C.S Gulma Haji Almas
47	Azmat Gul S/O Rahat Gul	Do
48	Liaqat Ali S/O Munilaz Khan	C.S Atam Killi Ghulam Sarwar
49	Khuzair Khan S/O Noor Jamal	C.S Atam Killi Mohdi Gul
50	Jamal Shah S/O Habib Khan	C.S Bad Manai Bakht Jamal
51	Khanadan S/O Wazir Khan	C.S Atam Kili Ghulam Sarwar
52	Azaz Ullah S/O Itbar Khan	C.S Sham Shah Biland
53	Issa Dad Khan S/O Dula Dad	C.S Atam Kili Mohdi Gul
54	Akbar Khan S/O Sher Jan	C.S Landi Shah Zarin Khan
55	Ijaz Ali S/O Wazir Khan	C.S Badmanai Yad Mohd
56	Hussain Shah S/O Syed Mastan Shah	C.S Manzari Cheena Faqir
57	Janat Gul S/O Zulfan	C.S Ghair Dhand Akram
58	Mazullah S/O Najcem Khan	C.S Bairdmani Yad Mohd
59	Said Ahmad S/O Mohammad Afzal	C.S Manzari Cheena Shinwari
60	Mohammad Khan S/O Mohammad Wali	C.S Toor Khel Ahmad Noor
61	Irfan Ullah S/O Alqash Khan	Do
62	Pazcer Khan S/O Mohammad Hanif	C.S Khanjar Killi Malik Abid
63	Ali Gohar S/O Ajmir Khan	C.S Yara Khel Haji Madar
64	Zahir S/O Bashir Khan	C.S Khanjar Killi Malik Abid
65	Sakhi Jan S/O Izzat Gul	C.S Jacobi Fazal
66	Zahid Ullah S/O Najcem Khan	C.S Sham Shah Biland
67	Ghulam Said S/O Noor Siad	C.S Luobi Abdullah
68	Bakr Shah Hassan S/O Ibrahim Shah	Do
69	Shah Jehan S/O Shamroz Khan	C.S Shamrad Khel Noor Zada
70	Liaqat Ali S/O Ikram Khan	Do
71	Asif Khan S/O Jamal Khan	C.S Maim Khel Malik Islam Bacha

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S.No.	Name of candidate with father name	School where appointed
27.	Jamil Shah S/O Hakeem Khan	CS Nazar Kore Aslam
28.	Aslam Khan S/O Hazrat Mohammad	CS Ucha Jewara Naik Mohammad
29.	Mohammad Quraish S/O Mohammad Akbar	CS Nazar Kore Aslam
30.	Mohammad Khan S/O Ghulam Sakhi	CS Soor Dagi Yaqub Khan
31.	Raz Mohammad S/O Shah Rasool	CS Kaka Kore Hunar Jan
32.	Gul Nabi S/O Lal Said	CS Soor Dagi Yaqub
33.	Anwar Shamim S/O Ahmad Gul	CS Kuzu Kass Ghulam Bashir
34.	Ghal Zar S/O Khan Said	CS Sam Ghakhai Siyaj Khan
35.	Fida Mohammad S/O Arsala Khan	----do----
36.	Saz Mohammad S/O Shah Rasool	CS Kaka Kore Hunar Jan
37.	Niqab Khan S/O Khan Sharif	CZ Kung Sabzali
38.	Saddi Khan S/O Maweez Khan	----do----
39.	Khyali Jan S/O Jaor Jan	CS Spinki Tangi Nadar
40.	Amir Khan S/O Hamid Khan	----do----
41.	Sshah Nazir S/O Arsala Khan	CS Spinki Tangi Sikandar
42.	Sultan Murad S/O Gula Dad	----do----
43.	Tahir Ali S/O Gula Khan	CS Bad Manai Bakht Jamal
44.	Mowad Gul S/O Hayat Gul	CS Forra Khwa Sherin
45.	Mohammad Raz S/O Zarqun Shah	----do----
46.	Siyar S/O Dost Mohammad	CS Gulma Haji Almas
47.	Azmat Gul S/O Rahat Gul	----do----
48.	Liaqat Ali S/O Mumtaz Khan	CS Atam Killi Ghulam Sarwar
49.	Khuzair Khan S/O Noor Jamal	CS Atam Killi Mohdi Gul
50.	Jamal Shah S/O Habib Khan	CS Bad Manai Bakht Jamal
51.	Khanadan S/O Wazir Khan	CS Atam Kili Ghulam Sarwar
52.	Azaz Ullah S/O Itbar Khan	CS Sham Shah Biland
53.	Issa Dad Khan S/O Dula Dad	CS Atam Kili Mohdi Gul
54.	Akbar Khan S/O Sher Jan	CS Landi Shah Zarin Khan
55.	Ijaz Ali S/O Wazir Khan	CS Badmanai Yad Mohammad
56.	Hussain Shah S/O Syed Mastan Shah	CS Manzari Cheena Faqir
57.	Janaf Gul S/O Zulfan	CS Ghair Dhand Akram
58.	Mazullah S/O Najeem Khan	CS Badmanai Yad Mohammad
59.	Said Ahmad S/O Mohammad Afzal	CS Manzari Cheena Shinwari
60.	Mohammad Khan S/O Mohammad Wali	CS Toor Khel Ahmad Noor
61.	Irfan Ullah S/O Aqash Khan	----do----
62.	Pazeer Khan S/O Mohammad Hanif	CS Khanjar Killi Malik Abid
63.	Ali Gohar S/O Ajmir Khan	CS Yara Khel Haji Madar
64.	Zahir S/O Bashir Khan	CS Khanjar Killi Malik Abid
65.	Shakhi Jan S/O Izzat Gul	CS Jarabi Fazal
66.	Zahid Ullah S/O Najeem Khan	CS Sham Shah Biland
67.	Ghulam Said S/O Noor Siad	CS Jarabi Abdullah
68.	Bad Shah Hassan S/O Ibrahim Shah	----do----
69.	Shah Jehan S/O Shamroz Khan	CS Shamrad Khel Noor Zada
70.	Liaqat Ali S/O Ikram Khan	----do----
71.	Asif Khan S/O Jamal Khan	CS Maim Khel Malik Islam Bacha

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16 B

Name of Candidate with Fathers Name

School where appointed

	Saddar Shah S/O Mir Zaman Khan	C.S Maim Khel Malik Islam Bacha
	Sartaj S/o Mahboob Khan	C.S Yara Khel Haji Madar
	Mohammad Nasser S/O Ghana Khan	C.S Mula Khel Toora Tangi Ayub
	Asad Khan S/O Saidar Khan	Do
75	Fayaz Khan S/O Badam Khan	C.S Shakar Khel Khatam Jan
77	Ajmal Khan S/O Harifullah	Do
78	Darwaish Khan S/o Gul Said	C.S Ughazado khel Farooq
79	Mustafa Khan S/O Wasil Khan	Do
80	Arif Shah S/O Ruhil Shah	C.S Abdul Khel Hingar M. Amin
81	Shahi Bad Shah S/O Hazrat Bad Shah	Do
82	Mohammad Hazoor S/O Hazrat Bad Shah	C.S Sana Khel Yaqub
83	Suhbat Shah S/O Amir Khisro	Do
84	Ihsan Ullah S/O Gul Alam	C.S Abdul Khel Saced Ullah
85	Kiraniah Shah S/O Musharaf Shah	Do
86	Dawood Shah S/O Sultan Shah	C.S Matina Malik
87	Fazlai Dayan S/O Sadrud Din	C.S kankar Killi M. Farid Ullah
88	Muzafar Khan S/O Zaman Khan	C.S Dag Killi Syed Qahar
89	Fazlai Subhan S/O Mirza Hakeem Sadrud Din	C.S Masti Kore Masahib Khan
90	Yousaf Khan S/O Syed Rahman	C.S Zoor Killi
91	Abdul Malik S/O Said Mohammad Shah	C.S Lakhka Killi Faiz Ali

**TERMS/CONDITIPONS:-**

- 1:- The appointments of the Teachers are made on temporary basis and liable to termination without any notice/assigning any reasons.
- 2:- They should produce their Health and Age certificates from the Agency Surgeon Mohmand Agency at Ghallanai.
- 3:- Charge report should be submitted to this office in duplicate with in a specific period.
- 4:- If the candidates/Teachers failed to report of their arrival to the concerned schools within fifteen days(15) their orders will be automatically considered as cancelled.
- 5:- Academic qualification is must to be verified.

(HAJI GUL RAHMAN)  
 Agency Education Officer  
 Mohmand Agency at Ghallanai.

Endst No: 4993- 5089 Dated. 06/02/2003.

Copy of the above is forwarded to the:-

- 1- Director of Education, FATA, NWFP, Peshawar.
- 2- Political Agent Mohmand Agency at Ghallanai w/r his office memo No. as cited.
- 3- Agency Surgeon Mohmand Agency at Ghallanai.
- 4- Asstt: Political Agent (Upper Mohmand) at Ghallanai.
- 5- Agency Accounts Officer, Mohmand Agency at Ghallanai.
- 6- Acct/Pay Clerk in local office.
- 7-97 Candidates concerned.

*[Signature]*  
 Agency Education Officer,  
 Mohmand Agency at Ghallanai.

Jakim Khan (D.E.O)  
 Mohmand Agency at Ghallanai

**ATTESTED**

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S.No.	Name of candidate with father name	School where appointed
72.	Sartaj S/O Mahboob Khan	CS Yara Khel Haji Madar
73.	Mohammad Naseer S/O Ghani Khan	CS Mula Khel Toor Tangi Ayub
74.	Azal Khan S/O Saidan Khan	----do-----
75.	Fayaz Khan S/O Badam Khan	CS Shakar Khel Khatam Jan
76.	Ajmal Khan S/O Harifullah	----do-----
77.	Darwaish Khan S/O Gul Said	CS Ughazado Khel Farooq
78.	Mustafa Khan S/O Wasil Khan	----do-----
79.	Arif Shah S/O Rahil Shah	CS Abdul Khel Hingar M. Amin
80.	Shah Bad Shah S/O Hazrat Bad Shah	----do-----
81.	Mohammad Hazoor S/O Hazrat Bad Shah	CS Sana Khel Yaqub
82.	Suhbat Shah S/O Amir Khisro	----do-----
83.	Ihsan Ullah S/O Gul Alam	CS Abdul Khel Saeed Ullah
84.	Kiram Shah S/O Musharaf Shah	----do-----
85.	Dawood Shah S/O Sulman Shah	CS Matina Malik
86.	Fazlai Dayan S/O Sadrud Din	CS Kankar Killi M. Farid Ullah
87.	Muzafar Khan S/O Zaman Khan	CS Dag Killi Syed Qahar
88.	Fazlai Subhan S/O Mirza Hakeem Sadrud Din	CS Masti Kore Masahib Khan
89.	Yousaf Khan S/O Syed Rahman	CS Zoor Killi
90.	Abdul Malik S/O Said Mohammad Shah	CS Lakhkar Killi Faiz Ali.

TERMS/CONDITIONS:

1. The appointments of the Teachers are made on temporary basis and liable to termination without any notice/assigning any reasons.
2. They should produce their Health and Age certificates from the Agency Surgeon Mohmand Agency Ghallanai.
3. Charge report should be submitted to this office in duplicate within a specific period.
4. If the candidates/Teachers failed to report of their arrival to the concerned schools within fifteen days(15) their orders will be automatically considered as cancelled.
5. Academic qualification is must to be verified.

(HAJI GUL RAHMAN)  
Agency Education Officer  
Mohmand Agency at Ghallanai

Endst No.4993-5089 dated: 06.03.2003

Copy of the above is forwarded to the:

1. Director of Education, FATA, NWFP, Peshawar.
2. Political Agent Mohmand Agency at Ghallanai w/r his office memo No. as cited.
3. Agency Surgeon Mohmand Agency at Ghallanai.
4. Asstt: Political Agent (Upper Mohmand) at Ghallanai
5. Agency Accounts Officer, Mohmand Agency at Ghallanai.
6. Acctt/Pay Clerk in local office.
7. Candidates concerned.

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wp4430 2018 Abdul malik vs Govt USB 403 pags

Agency Education Officer  
Mohmand Agency at Ghallanai

**NWFP PUBLIC SERVICE COMMISSION****2- Fort Road Peshawar Cantt:****Website: [www.nwfppsc.gov.pk](http://www.nwfppsc.gov.pk)**Dated: 26-01-2009**ADVERTISEMENT No. 01 / 2009.**

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

**AGRICULTURE LIVESTOCK & CO-OPERATIVE DEPTT:**

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

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

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

(S.No. 02) Two (2) Posts of Research officers Fodder. In L&DD Deptt:

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

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

Merit	Zone-1
01	01

**CHIEF ENGINEER WORKS & SERVICE DEPARTMENT.**

(S.No. 03) Five (05) Posts of Data Entry Operators:

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

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

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

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

(S.No. 04) One (01) Post of Male Inspector Mines

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

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

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provisions of the rules for the time being in force.

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

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

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

**ALLOCATION:**

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

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

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

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

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

**ALLOCATION:**

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

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

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

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

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

**ALLOCATION:** Merit.

(S.No. 54) **Ninty Two (92) Posts of Male SETs. /S.S.Ts For Earth Quake Quota (I.E) Battagram , Mansehra , Shangla , Kohistan, Abbottabad. (Both Science & Arts) (with out graduaty and pension).**

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

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

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

**ALLOCATION:** Merit.

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

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

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

**AGE LIMIT:** 21 to 40 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Female.

**ALLOCATION:**

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

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

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

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

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

**PAY SCALE:** BPS-16 **ELIGIBILITY:** Female.

**ALLOCATION:** Merit.

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

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

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

**AGE LIMIT:** 21 to 40 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Female.

**ALLOCATION:** Merit.

**TECHNICAL EDUATION AND MAN POWER TRAINING DEPARTMENT.**

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

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

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

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

**ALLOCATION:** Merit.

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

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

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(S.No. 66)	Ten (10) Posts of Male office Assistant.				
	<b>QUALIFICATION:</b> Bachelor degree from recognized University.				
	<b>AGE LIMIT:</b> 18 to 30 years. <b>PAY SCALE:</b> BPS-14. <b>ELIGIBILITY:</b> Male.				
	<b>ALLOCATION:</b>				
	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
	02	02	02	02	02

(S.No. 67)	One (01) Post of Female office Assistant.				
	<b>QUALIFICATION:</b> Bachelor degree from recognized University.				
	<b>AGE LIMIT:</b> 18 to 30 years. <b>PAY SCALE:</b> BPS-14. <b>ELIGIBILITY:</b> Female.				
	<b>ALLOCATION:</b> Merit.				

### CORRIGENDUM

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

### GENERAL CONDITIONS.

- Age, qualification and experience etc shall be reckoned on 26-02-2009 Maximum age limit as prescribed in the recruitment rules shall be relaxed upto 10 years for Govt Servants who have completed 2 years continuous service, upto 10 years for disabled persons and upto 3 years for candidates belonging to backward areas of Zone-1, Zone-3, Merged Areas of Hazara and Mardan Divisions and uper Tanawal, Districts of Swat, Upper Dir, Lower Dir, Chitral, Buner, Kala Dhaka Area, Kohistan District, Shangla, Gadoon Area in Swabi, Backward areas of Mansehra and Batagram, backward areas of Haripur District i.e., Kalanjar Field Kanungo Circle of Tehsil Haripur and Amazai Field Kanungo Circle of Tehsil Ghazi. However, a candidate shall be allowed relaxation in age in one of the above categories provided that the candidates from backward areas, in addition to automatic relaxation of three years shall be entitled to one of the relaxations available to Govt Servants, general or disabled candidates, whichever is relevant and applicable to them.
- Degrees / Diploma / Experience Certificates / Testimonials of unrecognized Institution are not accepted. Only original Degrees / Certificates are accepted. However, the candidates can apply on provisional certificate signed by the Controller of Examination of the respective Institution but candidates shall produce original degrees / certificates before their selection. Detail Marks Certificate for all the examination shall necessarily be required and these should be attached with the application forms.
- ALLOCATION of vacancies in BPS-17 and below shall be strictly in accordance with the Zonal ALLOCATION as indicated against each post(s). The applications of the candidates other than the specified zone(s) shall be ignored except for posts reserved for Merit quota. No zonal reservation stands for posts allocated to disabled quota and also for the posts in BPS-18 and above. All such posts shall be filled in on Open Merit.
- The candidates applying against disabled posts must attach with their application forms of disability certificate from the Provincial Council for Rehabilitation of Disabled Persons as well as disability certificate from the respective Medical Superintendent / Medical Board showing therein the specific disability.

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

**SPECIFIED BRANCHES OF THE NATIONAL BANK OF PAKISTAN.**

**Main Branches of:**

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

**ATTESTED**

**(Atta Ur Rehman)**

Secretary

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

**ATTESTED**

Annex 'F'

Directorate of Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar  
PH No. 091-9210389, 9210938,  
9210437, 9210957, 9210468  
Fax 091-9210936  
E-mail [desekpk@yahoo.com](mailto:desekpk@yahoo.com)



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Notification.

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

SNO	Name	Father Name	Domicile	Zone	Permanent Address	Place of Posting
1	2	3	4	5	6	7
1	Haseeb Ali	Mir Sulam Khan	FR Bannu	1	Vill: Hati Khail P.O Landi Jalandar FR Bannu	Services placed at the disposal of Director of Education FATA for further posting against vacant SST Gen posts.
2	Abdul Baseer	Gulshan Khan	FR DI Khan	1	VPO Darazenda FR DI Khan	-Do-
3	Muhammad Parang	Muhammad Yousuf	Mohmand Agency	1	Moh: Bicket Gunj P.O & Distt: Mardan	-Do-
4	Abdul Malik	Said Muhammad Shah	Mohmand Agency	1	VPO Laman Parang Ghar Mohmand Agency	-Do-
5	Yar Khan	Ali Rahman	Mohmand Agency	1	Vill: Matti Suran Dara P.O Lakari Mohmand Agency	-Do-
6	Zafar Iqbal	Gul Rahman	Mohmand Agency	1	VPO Ganjai, Tehsil Takht Bhai Distt: Mardan	-Do-

Terms and conditions:-

1. His services will be considered regular but without pension & Gratuity in terms of section 19 of the NWFP Civil Servant Act, 1973 as amended vide NWFP Civil Servants (Amendment) Act, 2005. he will however be entitled to Contributory provident fund in such a manner and at such rates as per prescribed by the Govt.
2. In case, he is already in Government service and working against pensionable post on regular basis before 31<sup>st</sup> day of July 2001, without any service break, on application to Khyber Pakhtunkhwa Public Service Commission through proper channel and selection by the commission, is appointed and allowed choice of option either to retain benefit of pension & gratuity as allowed to him under his previous terms of appointment or to avail the benefit of contributory provident fund allowed to him under new appointment.
3. His services are liable to termination on one month's notice from either side. In case of resignation with out notice his one-month pay/allowances shall be forfeited to the Government.

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

PH No. 091-9210389, 9210938,  
9210137, 9210957, 9210168  
Fax: 091-9210936  
E-mail [dssepkp@yahoo.com](mailto:dssepkp@yahoo.com)

23

## Notification.

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

S#	Name	Father name	Domicile	Zone	Permanent address	Place of posting
1	2	3	4	5	6	7
1.	Iffikhar Ali	Mir Salam Khan	FR Bannu	1	Vill: Hafit Khail P.O Landi Jalandar FR Bannu	Services placed at the disposal of Director of Education FATA for further posting against vacant SST General posts.
2.	Abdul Baseer	Gulshan Khan	FR DI Khan	1	VPO Darazenda FR DI Khan	—do—
3.	Muhammad Farooq	Muhammad Yousaf	Mohmand Agency	1	Moh: Bickel, Gurj P.O & Distt: Mardan.	—do—
4.	Abdul Malik	Said Muhammad Shah	Mohmand Agency	1	FPO Lannan Parang Ghar Mohmand Agency.	—do—
5.	Yar Khan	Ali Rahman	Mohmand Agency	1	Vill: Matti Suran Dara P.O Lakari Mohmand Agency.	—do—
6.	Zafar Iqbal	Gul Rahman	Mohmand Agency	1	FPO Ganjai, Tehsil Takht Bhai Distt: Mardan.	—do—

### Terms and conditions:-

1. His services will be considered regular but without pension & Gratuity in terms of section 19 of the NWFP Civil Servant Act, 1973 as amended vide NWFP Civil Servants (Amendment) Act, 2005. He will however be entitled to Contributory provident fund in such a manner and at such rates as per prescribed by the Govt.
2. In case, he is already in Government: Service and working against pensionable post on regular basis before 1<sup>st</sup> day of July 2001, without any service break, on application to Khyber Pakhtunkhwa Public Service Commission through proper channel and selection by the commission, is appointed and allowed choice of option either to retain benefit of pension & gratuity as allowed to him under his previous terms of appointment or to avail the benefit of contributory provident fund allowed to him under new appointment.
3. His services are liable to termination on one month's notice from either side. In case of resignation without notice his one-month pay/allowances shall be forfeited to the Government.

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**ATTESTED**

4. He should join his post within 30 days of the issuance of this notification. In case of failure to join there post within one month of issuance of this notification his appointment will expire automatically and no subsequent appeal etc shall be entertained.
5. He would be on probation for a period of one year extendable for another one year.
6. He will be governed by such rules and regulations as may be issued from time to time by the Govt.
7. His Services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be proceeded under the rules framed from time to time.
8. Charge report should be submitted to all concerned
9. The Director of Education FATA concerned would furnish a certificate to the effect that the candidate has joined the post or otherwise after one month of the issue of his posting orders.
10. The Director of Education FATA concerned will verify their documents before release of pay.
11. His seniority will be maintained as determined by the Khyber Pakhtunkhwa Public Service Commission.
12. No TA/DA will be allowed to the appointee for joining his duty.

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

Endst: No. 755-59/ File No. 2/A-1-I/SST(I)/PSC/ Appt: Dated Peshawar 05/03/2012

Copy forwarded for information and necessary action to the:-

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

ATTESTED

Dy: Director (Estab) 05/3/2012  
 Elementary and Secondary Education  
 Khyber Pakhtunkhwa Peshawar

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BETTER COPY

4. He should join his post within 30 days of the issuance of this notification. In case of failure to join there post within one month of issuance of this notification his appointment will expire automatically and no subsequent appeal etc. shall be entertained.
5. He would be on probation for a period of one year extendable for another one year.
6. He will be governed by such rules and regulations as may be issued from time to time by the Govt.
7. His Services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be proceeded under the rules framed from time to time.
8. Charge report should be submitted to all concerned.
9. The Director of Education FATA concerned would furnish a certificate to the effect that the candidate has joined the post or otherwise after one month of the issue of his posting orders.
10. The Director of Education FATA concerned will verify their documents before release of pay.
11. His seniority will be maintained as determined by the Khyber Pakhtunkhwa Public Service Commission.
12. No TA/DA will be allowed to the appointee for joining his duty.

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

Endst: No.955-59/File No.2/A-14/SST(F)/PSC/Apptt: Dated Peshawar 05/03/2012

Copy forwarded for information and necessary to action to the:

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

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

  
ATTESTED

  
ATTESTED



ANNEX G

26

**ADJUSTMENT**

Consequent upon their appointment as SST in BPS-16 on the basis of recommendation of Khyber Pakhtunkhwa Public Service Commission and placement of their services at the disposal of Director Education, FATA vide Director, Elementary & Secondary Education Khyber Pakhtunkhwa's Notification No. 955-59/File No.2/A-14/SST(F)/PSC/Apptt: dated 5-3-2012, the following SSTs are hereby adjusted in the schools noted against each with immediate effect:-

41  
04  
01  
02  
03

S/II	Name/Father's Name/Domicile/Address	Posted at	Remarks
1	Iftikhar Ali S/O Mir Salam Khan(FR Bannu) Vill: Hati Khail PO: Landi Jalandar F.R Bannu	GMS Injani, Orakzai Agency	Against vacant post
2	Abdul Baseer S/O Gulshan Khan(FR D.I.K) V/PO: Darazinda, FR D.I. Khan	GMS Abdur Razaq Koroonia F.R D.I. Khan	-do-
3	Muhammad Farooq S/O Muhammad Yousaf (Mohmand) Moh: Bicket Gunj PO: & Disit: Mardan	GMS Alingar Mohmand Agency	-do-
4	Abdul Malik S/O Said Muhammad Shah(Mohmand) V/PO: Laman Parang Ghar, Mohmand Agency	GMS Jammu F.R Kohat	-do-
5	Yar Khan S/O Aji Rahman (Mohmand) Vill: Matti Suran Dara PO: Lakarai, Mohmand Agency	GMS Bahadur Killi, Mohmand Agency	-do-
6	Zafar Iqbal S/O Gul Rahman(Mohmand) V/PO: Tehsil Takht Bhai Distt: Mardan	GMS Abdul Kore, Mohmand Agency	-do-

Note:-

The terms & conditions of their posting will be the same as already prescribed in the above mentioned Notification of Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.

(FAZLI MANAN)  
 DIRECTOR EDUCATION (FATA)

Endst: No. 3187-3200 /A-1/Apptt: of SST (Gen)(PSC)2012 Dated Pesh: the 7/3 2012

Copy forwarded to the:-

- 1 Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar w/r to his Notification cited above.
- 2 Agency Education Officers concerned
- 3 Agency/District Accounts Officers concerned
- 4 Principal/Headmasters concerned
- 5 Candidate concerned
- 6 P.A to D.E FATA

P.F.

ATTESTED

*(Signature)*

ADDL DIRECTOR (ESTAB)

ATTESTED





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ANNEX H

### NOTIFICATION

1. WHERE AS: one Mr. Abdul Malik S/O Said Muhammad who himself appointed/adjusted as SST (G) in GHS Navi Kali Prang Ghar District Mohmand vide Notification No. 955-59/File No. 2/A-14/SST(M)/PSC/Apptt: dated 05/03/2012 and No. 3187-3200 A1/PSC (G) 2012 dated 07/03/2012 upon the production of fake/bogus appointment/adjustment order not issued by the Directorate of Education erstwhile FATA Nor by the Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa.
2. AND WHERE AS, the competent authority has directed the above said accused SST to produce authentic and verified service record from the concerned authorities, but he failed to comply with the legitimate directions of high ups regarding production of requisite authentic documents/record.
3. AND WHERE AS, further an inquiry committee was constituted by the competent authority vide Notification No. 8154-63 dated 04/8/2016 who have gone through the entire case record and it has been proved that the said appointment/adjustment order for the aforesaid post advertised by Public Service Commission Khyber Pakhtunkhwa was turned out fake/bogus.
4. AND WHERE AS, it has come to the notice of the competent authority that Mr. Abdul Malik S/O Said Muhammad, having no legal status of the said appointment/adjustment order.
5. NOW THEREFORE, under the mandatory provision and power conferred under Section-20 & 21 for General clauses Act-1897 as amended in 1956 and in pursuance of the scrutiny of selection/appointment record in r/o the above mentioned SST which was found fake/bogus, thus his appointment/adjustment Notification No. 955-59/File No. 2/A-14/SST(M)/PSC/Apptt: dated 05/03/2012 and No. 3187-3200 A1/PSC (G) 2012 dated 07/03/2012 is hereby "DISOWNED" ab initio and with the direction to District Education Officer (concerned) to recover salaries and other allied benefits drawn by Mr. Abdul Malik S/O Said Muhammad in the interest of Public Service.

Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

5652-57

Endst: No. \_\_\_\_\_ dated 6/4/2019

1. Copy forwarded with the to the Deputy Commissioner, District Mohmand with the request to take legal action.
2. District Education Officer District Mohmand with the direction to take necessary steps for the recovery of outstanding amount against fake/bogus SST concerned.
3. District Account Officer District Mohmand to co-operate in the matter.
4. Principal GHS Navi Killi Prang Ghar District Mohmand.
5. PS to Secretary Elementary and Secondary Education Khyber Pakhtunkhwa.
6. PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa.

Deputy Director (Estab)  
Merged Districts

ATTESTED

## بھنور جناب سیکرٹری E&amp;SE ڈیپارٹمنٹ KP پشاور

محکمہ اپیل بر خلاف نوٹیفیکیشن محررہ 4-4-2019 جس کی رو سے ڈائریکٹر صاحب E&SE کے ڈیپارٹمنٹ KP پشاور نے اپیلنٹ (Appilant) کے بھرتی کے احکامات بحیثیت SST محررہ 5-3-2012 اور بعد از ایڈجسٹمنٹ آرڈر محررہ 7-3-2012 کو یکطرفہ طور پر جعلی و فرضی بتلا کر اپیلنٹ (Appilant) کو ملازم ماننے سے انکار کر دیا۔

استدعا: نوٹیفیکیشن محررہ 4-4-2019 مجازیہ جناب ڈائریکٹر صاحب E&SE ڈیپارٹمنٹ KP پشاور کو قاعدہ کر کے اپیلنٹ (Appilant) کو ملازمت پر تمام مراعات کے ساتھ بحال کیا جائے۔

جناب عالی!

۱۔ یہ کہ Appilant ڈاکے تحصیل پڑانگ غار ضلع مہند کا مستقل و پیدائشی باشندہ ہے۔

۲۔ یہ کہ Appilant M.A M.Ed تک تعلیم یافتہ ہے۔

۳۔ یہ کہ Appilant پہلے سے یعنی 6-3-2003 سے بحیثیت PTC مہنداجنسی میں تعینات تھا۔

۴۔ یہ کہ محکمہ E&SE ڈیپارٹمنٹ KP پشاور نے بذریعہ اشتہار محررہ 2009 مجازیہ KPPSC نے صوبہ سرحد (اب KP) کے اہل امیدواروں سے

SST کی پوسٹوں کے لیے درخواستیں طلب کیے۔ چونکہ Appilant تمام شرائط پر پورا اتر رہا تھا۔ اس لیے بذریعہ Through proper channel اپلائی کی۔

۵۔ یہ کہ بھرتی کے مروجہ طریقہ کار سے نکلنے ہوئے Appilant میرٹ لسٹ میں جگہ بنانے میں کامیاب ہوا۔

۶۔ یہ کہ Appilant کو KPPSC نے باقاعدہ E&SE ڈیپارٹمنٹ KP پشاور کو منظور کیا۔ جو کہ محکمہ نے بذریعہ نوٹیفیکیشن محررہ 5-3-2012 تعیناتی

کے احکامات جاری کر کے بعد از روئے حکم محررہ 7-3-2012 ٹرانسفر ڈسٹرکٹ FR کوہاٹ میں جی ایم ایس جوم میں ایڈجسٹ کیا گیا۔ اور اب تک میرا بحیثیت SST فائنڈ ڈائریکٹر میں 4 تباد لے کیے ہیں۔ اور تب سے لیکر متاثر نوٹیفیکیشن کے جاری ہونے تک باقاعدگی سے نوکری سرانجام دیتا رہا۔

۷۔ یہ کہ بغیر چارج شیٹ اور شو کاز نوٹس و پرسنل میٹرنگ اور ریگولر انکوائری کے Appilant کو یکطرفہ احکامات محررہ 04-04-2019 کی رو سے نوکری سے برخاست کیا گیا۔ بلکہ بھرتی احکامات کو جعلی و فرضی گردانہ کیا جو کہ ظلم اور نا انصافی کا منہ بولتا ثبوت ہے۔ اس لیے قابل منسوخی ہے۔

۸۔ یہ کہ Appilant کے 16 سال سے زیادہ عرصہ ملازمت کو بہ یک جنبش قلم ختم کر کے نہ صرف گھر بھیج دیا گیا بلکہ دور ملازمت کی تمام تنخواہیں واپس لی جانے کے احکامات جاری کیے گئے جو کہ آئین اور قانون کے منافی ہے۔

لہذا التماس ہے کہ بمظوری درخواست ہذا نوٹیفیکیشن محررہ 4-4-2019 کو قاعدہ کر کے Appilant ملازمت پر بحال کیا جائے۔

آپ کا مخلص

*(Signature)*

12/04/2019 SST

جی ایچ ایس نوی کلے تحصیل پڑانگ غار ڈسٹرکٹ مہند

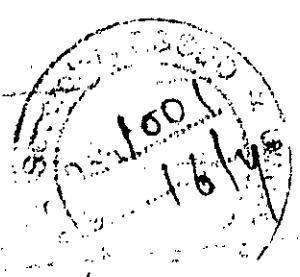
ATTESTED

نام اصل گھڑی STC لسٹ

- 1- شاکر علی ولد سردار شاہ GHS
- 2- بار خان ولد علی ارمان GHS
- 3- عفتیجان ولد اختر جان GHS
- 4- عبدالرشید ولد محمد طیب GHS
- 5- محمد سید ولد عزیز GHS
- 6- عبدالرشید ولد عبدالرشید GHS
- 7- محمد فاروق ولد محمد یونس GHS
- 8- شہزاد اجبال ولد گلشن رحمان GHS
- 9- محمد طارق ولد شرف محمد GHS
- 10- بشیر احمد ولد خان محمد GHS

- 22) فخرالہ ولد آرام الرحمن (Transfer To settled)
- 23) اکیف القدر ولد رحیم خان GHS
- 24) عبدالجبار ولد سلام خان (FR (AAR) طوسی خان)
- 25) اشفاق احمد ولد فضل رازق GHS
- 26) انجم محمد اجبال ولد خان بہادر GHS
- 27) اشفاق احمد ولد رحمان شاہ GHS
- 28) فضل رازق ولد فضل رحیم GHS

- 11) محمد قاسم ولد محمد شاہ GHS
- 12) لوہان علی ولد محمد علی GHS
- 13) نور محمد ولد فقیم خان GHS
- 14) محمد نعیم ولد فقیم خان GHS
- 15) محمد نعیم ولد سیم GHS
- 16) عطاء اللہ ولد عبد الجبار GHS
- 17) شہزاد خان ولد محمد جبار (Transfer Settled) GHS
- 18) سیم خان
- 19) شہباز خان ولد رحیم رحیم GHS



ATTESTED

وکالت نامہ

بعدالت حکم کٹھن کو خواہ مسوس ٹریڈرسٹریٹ لاہور

(30)

عبدالملک بنام گورنمنٹ آف پی ایچ

منجانب ریٹائرمنٹ دعویٰ اجرم مسوس وکیل

تھانہ ایف آئی آر تاریخ

باعث تحریر آنکے

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے پیروی و جوابدہی بمقام

امین الرحمن یوسفزئی ایڈووکیٹ ہائی کورٹ، فیڈرل شریعت کورٹ آف پاکستان اینڈ سجاد احمد محسود ایڈووکیٹ ہائی کورٹ،

نو بدین شرط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا رہوں گا۔ اور بوقت پکارے جانے مقدمہ مکمل صاحب موصوف کو اطلاع دیکر حاضر عدالت کروں گا اگر پیشی پر من مظهر حاضر نہ ہوا اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے برخلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام کچہری کے کسی اور جگہ یا کچہری کے مقررہ اوقات سے پہلے یا پیچھے یا بروز تعطیل پیروی کرنے کے ذمہ دار نہ ہوں گے۔ اگر مقدمہ علاوہ صدر مقام کچہری کے کسی اور جگہ جماعت ہونے یا بروز تعطیل یا کچہری کے اوقات کے آگے پیچھے پیش ہونے پر من مظهر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا مختار نامہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پرداخت صاحب موصوف مثل کردہ ذات خود منظور قبول ہوگا۔ اور صاحب موصوف کو عرضی دعویٰ و جواب دعویٰ اور درخواست اجرائے ڈگری و نظر ثانی اپیل و نگرانی ہر قسم کی درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کے اجرا کرنے اور ہر قسم کا روپیہ وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور سپرد ثالثی و راضی نامہ کو فیصلہ برخلاف کرنے، اقبال دعویٰ دینے کا بھی اختیار ہوگا۔ اور بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم انتہائی یا قرتی یا گرفتاری قبل از اجراء ڈگری بھی موصوف کو بشرط ادا ہنگی علیحدہ مختار نامہ پیروی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو بھی اختیار ہوگا یا مقدمہ مذکورہ یا اس کے کسی جزوی کاروائی کے واسطے یا بصورت اپیل، اپیل کے واسطے کسی دوسرے وکیل یا ایئر من کو بجائے اپنے یا اپنے ہمراہ مقرر کریں۔ اور ایسے مشیر قانون کو ہر امر میں وہی اور ویسے ہی اختیارات حاصل ہوں گے۔ جیسے کہ صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر جانہ التواء پڑے گا۔ وہ صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی پیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا یہ مختار نامہ لکھ دیا کہ سندر ہے مورخہ \_\_\_\_\_ مضمون مختار نامہ سن لیا ہے اور

ATTESTED & ACCEPTED:

Amin ur Rehman Yousafzai  
Advocate High Court,  
& Federal Shariat Court  
of Pakistan.

Sajjad Ahmad Mehsud  
Advocate High Court  
Peshawar

Adv.  
Kharshid  
Khan  
BC-18-110  
Kharshid

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

Service Appeal No:968/2019

**Abdul Malik ,Ex SST (G) B-16 District Muhmand ....Appellant.**

**VERSUS**

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

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

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

Service Appeal No: 968/2019

**Abdul Malik ,Ex SST (G) B-16 District Muhmand.....Appellant.**

**VERSUS**

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

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

Respectfully Sheweth:-

The Respondents submit as under:-

**Preliminary Objections.**

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

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

**ON FACTS.**

- 1 That Para-1 needs no comments, being pertains to the Service Record of the Appellant against the SST (G) B-16 post which has been declared fake & bogus and even disowned by the Respondent Department vide Notification dated 4/4/2019. In view of the recommendations of the inquiry committee which was constituted vide Notification No. 8154-63 dated 4/8/2016, who submitted its report that the afore said order & Appointment Notification dated 05/03/2012 of the appellant is fake & bogus with no cogent record in the Respondents No.2 & 3 offices.
2. That Para-2 also needs no comments being pertains to the academic & professional qualification of the appellant.
- 3 That Para-3 is also needs no comments.
- 4 That para-4 is correct to the extent of Advertisement dated 26/01/2009 by the Respondent No.03, wherein, the appellant did not apply for the said post nor appeared in the interview before the Respondent No.3 for the appointment against SST (G) Male B-16 post, hence, the claim of the appellant regarding his appointment vide Notification dated 05/03/2012 is baseless & liable to be rejected in favor of the Respondents. **(Copy of the Ad; dated 26/01/2009 is Annexure-A).**
- 5 That Para-5 is incorrect & denied on the grounds that no cogent proof & legal justification has been annexed by the appellant in support of his stand regarding his recommendations against the SST (G) B-16 post by the KPK PSC & his further adjustment vide Notification dated 05/03/2012 against the said post in the Respondent Department are fake & bogus as the entire service record of the appellant has been found fake & bogus, hence, his services against the SST (G) B-16 post has been disowned & even null & void ab-initio having no legal effect in the eyes of law & rules vide Notification dated 04/04/2019 by the competent authority **(Copy of the said Notification dated 04/04/2019 is Annexure-B).**

- 6 That Para-6 is incorrect & denied on the grounds that the services of the appellant against the SST (G) B-16 post have been disowned vide Notification dated 4/4/2019 by the Respondent No.2 after observing all legal formalities under the rules & the claim of the appellant regarding his recommendations by the KPK PSC against the SST(G) B-16 & his adjustment as SST vide Notification dated 07/03/2012 are fake & bogus having no record in the Respondent Department.
- 7 That Para-6 is incorrect on the grounds that the Services of the appellant has been placed against the SST (G) B-16 at GMS Jammu FR Kohat vide order dated 07/03/2012 as per claim of the appellant is also fake & Bogus, hence, disowned by the Respondent Department by the competent authority & where against no Departmental appeal against the Notification dated 4/4/2019 has been filled by the appellant to the competent authority nor any such record is available in the Respondent Department till date, hence, got finality under the Law & rules against the appellant
- 8 That para-7 is incorrect & denied on the grounds that the Services of the appellant against the SST (GP) B-16 has been disowned by the competent authority & where against no Departmental appeal against the Notification dated 4/4/2019 has been filled by the appellant to the competent authority nor any such record is available in the Respondent Department till date, hence, got finality under the Law & rules against the appellant.
- 9 That para -8 is incorrect & denied as no Departmental appeal against the Notification dated 4/4/2019 has been filled by the appellant to the competent authority nor any such record is available in the Respondent Department till date, hence, got finality under the Law & rules against the appellant, however, the Respondents further submit on the following grounds inter alia:-

**ON GROUNDS.**

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



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

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

Dated \_\_\_ / \_\_\_ /2020



Director

E&SE Department Khyber  
Pakhtunkhwa, Peshawar.

(Respondent No: 2)



Secretary

E&SE Department Khyber  
Pakhtunkhwa, Peshawar.

(Respondent No: 1)

**AFFIDAVIT**

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



Deponent

## NWFP PUBLIC SERVICE COMMISSION

2- Fort Road Peshawar Cantt:

Website: [www.nwfppsc.gov.pk](http://www.nwfppsc.gov.pk)

Dated: 26-01-2009

ADVERTISEMENT No. 01 / 2009.

(A)

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

AGRICULTURE LIVESTOCK & CO-OPERATIVE DEPTT.

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

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

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

(S.No. 02) Two (2) Posts of Research officers Fodder: In L&DD Deptt:

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

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

Merit	Zone-1
01	01

CHIEF ENGINEER WORKS & SERVICE DEPARTMENT.

(S.No. 03) Five (05) Posts of Data Entry Operators:

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

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

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

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

(S.No. 04) One (01) Post of Male Inspector Mines

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

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

ALLOCATION:

ATTESTED

provisions of the rules for the time being in force.  
**NOTE:** For History-cum-Civics : The candidates must possess Master's Degree either in History or Political Science provided the other required subjects has studied at B.A level. The other requirement of teaching degree will, however, remain intact.  
**For Biology:** 2<sup>nd</sup> Class Master Degree in Botany or Zoology provided that other subject have been studied at graduate level.  
**AGE LIMIT:** 25 to 40 years **PAY SCALE:** BPS-17 **ELIGIBILITY:** Female.  
**ALLOCATION:**

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

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

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

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

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

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

(S.No. 54) Ninety Two (92) Posts of Male SETs. /S.S.Ts For Earth Quake Quota (I.E) Battagram, Mansehra, Shangla, Kohistan, Abbottabad. (Both Science & Arts) (with out graduaty and pension).

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

ATTESTED

16

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

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

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

AGE LIMIT: 21 to 40 years. PAY SCALE: BPS-16 ELIGIBILITY: Female.

ALLOCATION:

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

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

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

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

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

PAY SCALE: BPS-16 ELIGIBILITY: Female.

ALLOCATION: Merit.

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

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

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

AGE LIMIT: 21 to 40 years. PAY SCALE: BPS-16 ELIGIBILITY: Female.

ALLOCATION: Merit.

TECHNICAL EDUATION AND MAN POWER TRAINING DEPARTMENT.

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

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

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

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

ALLOCATION: Merit.

ATTESTED

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

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

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(S.No. 66)	Ten (10) Posts of Male office Assistant.				
	<u>QUALIFICATION:</u> Bachelor degree from recognized University.				
	<u>AGE LIMIT:</u> 18 to 30 years. <u>PAY SCALE:</u> BPS-14. <u>ELIGIBILITY:</u> Male.				
	<u>ALLOCATION:</u>				
	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
	02	02	02	02	02

(S.No. 67)	One (01) Post of Female office Assistant.				
	<u>QUALIFICATION:</u> Bachelor degree from recognized University.				
	<u>AGE LIMIT:</u> 18 to 30 years. <u>PAY SCALE:</u> BPS-14. <u>ELIGIBILITY:</u> Female.				
	<u>ALLOCATION:</u> Merit.				

### CORRIGENDUM

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

### GENERAL CONDITIONS.

- (i) Age, qualification and experience etc shall be reckoned on 26-02-2009 Maximum age limit as prescribed in the recruitment rules shall be relaxed upto 10 years for Govt Servants who have completed 2 years continuous service, upto 10 years for disabled persons and upto 3 years for candidates belonging to backward areas of Zone-1, Zone-3, Merged Areas of Hazara and Mardan Divisions and uper Tanawal, Districts of Swat, Upper Dir, Lower Dir, Chitral, Buner, Kala Dhaka Area, Kohistan District, Shingla, Gadoon Area in Swabi, Backward areas of Mansehra and Batagram, backward areas of Haripur District i.e., Kalanjar Field Kanungo Circle of Tehsil Haripur and Amazai Field Kanungo Circle of Tehsil Ghazi. However, a candidate shall be allowed relaxation in age in one of the above categories provided that the candidates from backward areas, in addition to automatic relaxation of three years shall be entitled to one of the relaxations available to Govt Servants, general or disabled candidates, whichever is relevant and applicable to them.
- (ii) Degrees / Diploma / Experience Certificates / Testimonials of unrecognized Institution are not accepted. Only original Degrees / Certificates are accepted. However, the candidates can apply on provisional certificate signed by the Controller of Examination of the respective Institution but candidates shall produce original degrees / certificates before their selection. Detail Marks Certificate for all the examination shall necessarily be required and these should be attached with the application forms.
- (iii) ALLOCATION of vacancies in BPS-17 and below shall be strictly in accordance with the Zonal ALLOCATION as indicated against each post(s). The applications of the candidates other than the specified zone(s) shall be ignored except for posts reserved for Merit quota. No zonal reservation stands for posts allocated to disabled quota and also for the posts in BPS-18 and above. All such posts shall be filled in on Open Merit.
- (iv) The candidates applying against disabled posts must attach with their application forms of disability certificate from the Provincial Council for Rehabilitation of Disabled Persons as well as disability certificate from the respective Medical Superintendent / Medical Board showing therein the specific disability.

ATTESTED

1/1

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

(vi) Applications should be on the prescribed application form obtainable from the listed below branches of the NATIONAL BANK. Application Fee is Rs. 285/- (Rupees Two Hundred Eight Five only) for all the candidates. In addition to the application fee, the candidates will have to pay Rs. 15/- (rupees fifteen only) on account of Bank Charges. Separate application form will be required for each advertised category of posts. Application forms obtained other than the specified branches of the National Bank will be considered invalid and such applications will not be entertained. The applications on plain paper or Photostat shall not be accepted. Incomplete and late applications shall also be ignored.

(vii) Application must be submitted within time as no extra time is allowed for postal transit. The applications if submitted on the last date for receipt of applications must reach the Commission's office by the closing hours.

(viii) Applicants married to Foreigners are considered only on production of the Govt. Relaxation Orders.

(ix) No applicant shall be considered in absentia on paper qualifications unless, he/she possesses exceptionally higher qualifications than the minimum prescribed qualification for a particular post(s).

(x) Govt. reserves the right not to fill any or fill more or less than the advertised post(s).

(xi) Candidates who have already availed three chances by physical appearance before the Commission and have failed for the post(s) having one and the same qualifications and scale of pay shall be ineligible.

(xii) Experience wherever prescribed shall be counted after the minimum qualifications for the post(s), if not specifically provided otherwise against the advertised post(s).

(xiii) In cases where the number of applications received for post(s) are disproportionately higher than the number of available vacancies, shortlisting of the candidates may be done in any one of the following manner:

- Written Test in the Subject.
- General Knowledge or Psychological General Ability Test.
- Academic and / or Professional record as the Commission may decide.

### SPECIFIED BRANCHES OF THE NATIONAL BANK OF PAKISTAN.

#### Main Branches of:

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

ATTESTED

(Atta Ur Rehman)

Secretary

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

ATTESTED



DIRECTORATE OF ELEMENTARY &  
SECONDARY EDUCATION KHYBER  
PAKHTUNKHWA

(B)

NOTIFICATION

- WHEREAS Mr. Zafar Iqbal S/O Gul Rehman who himself appointed/adjusted as SST in SMS Maazullah Khwazai District Mohmand vide Notification No. 955-59/ File No. 2/A-14/SST(M)/PSC/Apppt: dated 05/03/2012 and No. 3187-3200 A1/PSC (G) 2012 dated 07/03/2012 upon the production of fake/bogus appointment/adjustment order not issued by the Directorate of Education erstwhile FATA nor by the Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa.
- AND WHEREAS, the competent authority has directed the above said accused SST to produce authentic and verified service record from the concerned authorities, but he failed to comply with the legitimate directions of high ups regarding production of requisite authentic documents/record.
- 3 AND WHEREAS, further an inquiry committee was constituted by the competent authority vide Notification No. 8154-63 dated 04/8/2016 who have gone through the entire case record and it has been proved that the said appointment/adjustment order for the aforesaid post advertised by Public Service Commission Khyber Pakhtunkhwa was turned out fake/bogus.
- 4 AND WHEREAS, it has come to the notice of the competent authority that Mr. Zafar Iqbal S/O Gul Rehman, having no legal status of the said appointment/adjustment order.
- 5 NOW THEREFORE, under the mandatory provision and power conferred under Section-20 & 21 for General clauses Act-1897 as amended in 1956 and in pursuance of the scrutiny of selection/appointment record in r/o the above mentioned SST which was found fake/bogus, thus his appointment/adjustment Notification No.955-59/File No. 2/A-14/SST(M)/PSC/Apppt: dated 05/03/2012 and No. 3187-3200 A1/PSC (G) 2012 dated 07/03/2012 is hereby "DISOWNED" ab initio and with the direction to District Education Officer (concerned) to recover salaries and other allied benefits drawn by Mr. Zafar Iqbal S/O Gul Rehman in the interest of Public Service.

Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

Endst: No. 5647-51 dated 4/4 2019

Copy forwarded to the:-

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

Deputy Director (Admin)  
Merged Districts

ATTESTED

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

Service Appeal No. 968/2019

Abdul Malik.....Appellant

**VERSUS**

Government of Khyber Pakhtunkhwa & Others.....**Respondents**

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2.	Copy of KP PSC Advertisement 01/2009	"A"	4



Senior Law Officer  
Khyber Pakhtunkhwa  
Public Service Commission Peshawar

UMS88642628



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

**Service Appeal No. 968/2019**

**Abdul Malik.....Appellant**

**VERSUS**

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

**PARAWISE COMMENTS ON BEHALF OF (RESPONDENT NO. 03)**

**PRELIMINARY OBJECTIONS:**

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

**ON FACTS:**

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

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

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

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

**ALLOCATION:**

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

**(Annex-A)**

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

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

5-8. Not pertaining to Public Service Commission.

**GROUND.**


A-C. Not pertaining to Public Service Commission.

D. Incorrect. The appellant concerned is not a recommendee / selectee of the Khyber Pakhtunkhwa Public Service Commission as explained in Para 4.

E. Not pertaining to Public Service Commission.

F. The appellant may not be allowed to raise any other grounds during the course of arguments against the replying respondent Khyber Pakhtunkhwa Public Service Commission.

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

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

3  
**AFFIDAVIT**

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

**DEPONENTS**

*R. Javed*

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

# NWFP PUBLIC SERVICE COMMISSION

2- Fort Road Peshawar Cantt:

Website: [www.nwfppsc.gov.pk](http://www.nwfppsc.gov.pk)

Dated: 26-01-2009

## ADVERTISEMENT No. 01 / 2009.

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

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

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

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

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

**ALLOCATION:**

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

**(Atta Ur Rehman)**

Secretary

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


# Receipt

Title Abdul Malik vs Govt of KP

Appeal No 968/2019

I have received Rs 2000/-  
from the KPPSC Representative as  
per court order

Name Abdul Malik

Signature 

Dated - 22/7/2020