

**BEFORE THE HONRABLE SERVICE TRIBUNAL KHYBER**  
**PAKHTUNKHWA, PESHAWAR CAMP COURT ABBOTTABD.**

SERVICE APPEAL NO 7267-A/2021

MR SHOUKAT HUSSAIN:..... APPELLANT

VS

GOVERNMENT OF KHYBER PAKHTUNKHWA THROUGH  
SECRETARY EDUCATION DEPARTMENT PESHAWAR &  
OTHERS.....RESPONDENTS

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Dated \_\_\_\_\_

Respondents

Through Representative

(1)

**BEFORE THE HONRABLE SERVICE TRIBUNAL KHYBER  
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**GOVERNMENT OF KHYBER PAKHTUNKHWA THROUGH  
SECRETARY ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT PESHAWAR & OTHERS.....RESPONDENTS**

Para wise comments on behalf of the Respondents No 1 to 3.

Respectfully Sheweth:

Para wise comments on behalf of the respondents No 1 to 3 are as under.

**PRELIMINARY OBJECTIONS.**

1. That the appellant has no locus standi/cause of action to file service appeal.
2. That the service appeal is not maintainable in its present form.
3. That the appellant has not approach this Honorable Tribunal with clean hands.
4. That the appellant suppressed the original facts from this Honorable tribunal and not entitled for any relief and service appeal is liable to be dismissed.
5. That the service appeal is hopelessly time barred.
6. That the service appeal is bad for mis-joinder non-joinder of the necessary and proper parties.
7. That the appellant is stopped to agitate the instant matter before this Honorable Tribunal.
8. That the act of the respondent is in accordance with law and rules and law hence appeal is liable to be dismissed.

*[Signature]*  
27/4/2022

## FACTUAL OBJECTION

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1. Para No.1 of the service appeal is pertains to record. Hence no comments.
2. Para No.2 service appeal is pertain to record. No comments.
3. Para No. 3 of the Service appeal pertains to record. No comments.
4. Para 4 of the appeal is pertains to record. No comments.
5. Para No 5 of the appeal is relates to record. Hence no comments.
6. Reply of Para No 6 of the appeal is that appellant was appointed in the year 18-5-1992, and due to dissolved the commissionaire system 07-09-2002 kept in to surplus pool. As per surplus policy appellant was adjusted on 26-09-2002 at GHS Noorpur Haripur, and was transferred 02-04-2007 from GHS Noorpur Haripur to District Abbottabad at GGHS Sialkote Abbottabad. The Seniority of the appellant went to bottom due to the change of Department. Further stated that the seniority of the every department is separate to each other's. The seniority of the appellant has considered form 26-09-2002. On the basis of seniqrity 2002 appellant has promoted. (Photocopy of Surplus pool is attached as Annexure "A").
7. Para No. 7 of the service appeal is incorrect. Further stated that the appellant first appointment was in the DCO office and after the surplus pool appellant was adjusted in Education Department. The seniority of the appellant has considered w.e.f. 26-09-2002, as per surplus pool policy the seniority of the appellant below than the others. (Photocopy of Seniority list is annexed as Annexure "B").
8. Reply of to this Para is that appellant was filed Departmental to competent authority but neither no diary No on the Departmental appeal nor any receipt correspondence to high. up in the Departmental appeal. On the such basis the present Service appeal is time barred.
9. Para No. 9 of the appeal is incorrect.

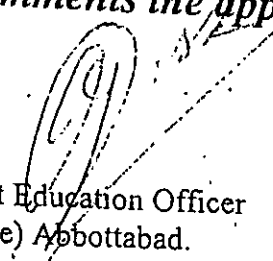
## REPLY ON GROUNDS:

- a) Ground "a" of the appeal is incorrect. The conduct of answering respondents is in accordance with rules and law.
- b) Reply of Para "b" of the ground is that there is no appellant right infringe, the appellant was treated in accordance with rules and law. The appellant was adjusted in education department on the basis of surplus pool due to which appellant seniority has low than the others.
- c) Para "c" of the ground is incorrect. Hence not entitled for any relief.
- d) Para "d" of the ground is incorrect. As replied above.
- e) Pata "e" of the ground is that appellant is incorrect. As replied above.
- f) Reply Para "f" of the ground is that appellant has treated as per surplus pool policy.
- g) Para "g" of the ground is incorrect.
- h) Para "h" of the ground is incorrect, the instant appeal is badly time barred.
- i) Para "j" of the ground is incorrect. Other points shall be raised at the time of arguments.

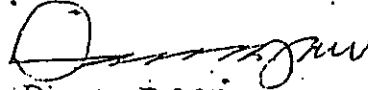
27/4/22

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*It is therefore humbly prayed that in the light of foregoing comments the appeal may graciously be dismissed with cost.*

  
District Education Officer  
(Female) Abbottabad.

(Respondent No 3)

  
Director E & SE  
Peshawar.

(Respondent No 2)

  
Secretary E & SE  
Khyber Pakhtunkhwa,  
Peshawar.

(Respondent No 1)



Through Representative

**AFFIDAVIT**

*Stated on oath that the contents of instant Para wise comments are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Tribunal.*

Respondent No 3

Annexure  
"A"

(4)

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### Surplus Pool Policy

#### Policy for declaring government servants as surplus and their subsequent absorption/ adjustment.

I am directed to refer to the subject noted above and to say that the Provincial Government has been pleased to make the following policy for absorption/adjustment of Government Servants declared as surplus in view of the transition of District System and resultant re-structuring of the Government Organizations/Departments etc.

1. POWER WITH REGARD TO THE DECLARATION OF POSTS AS SURPLUS.

The Finance Department in consultation with Department concerned and with the approval of competent authority would decide with regard to the declaration of a particular organization, set up or individual post as redundant or inessential.

2. CREATION OF SURPLUS POOL

There will be a surplus pools cell in the E&AD. After abolition of such posts in the concerned department, duly notified by the Finance Department, equal number of posts in the corresponding basic pay scales would be created in the E&AD for the purpose of drawl of pay and allowances etc by the employees declared surplus as such.

3. IMPLEMENTATION/MONITORING CELL

For the purpose of coordination and to ensure proper and expeditious adjustment/ absorption of surplus staff, the Government of NWFP has been pleased to constitute the following committee:-

- a. Additional Secretary(Establishment) E&AD.....Chairman.
- b. Deputy Secretary LG&RD Department.....Member
- c. Deputy Secretary Finance Department.....Member
- d. Deputy Secretary(Establishment) E&AD.....Secretary

4. CRITERIA FOR DECLARING A GOVERNMENT SERVANT AS SURPLUS AS A RESULT OF ABOLITION OF POST.

Consequent upon the abolition of a post in a particular cadre of a department, the junior most employee in that cadre would be declared as surplus. Such posts should be abolished in the respective departments and created in the surplus pool as indicated in para 2 above for the purpose of drawl of pay and allowances and also for consideration for subsequent adjustment.

5. PROCEDURE FOR ADJUSTMENT OF SURPLUS EMPLOYEES

Notwithstanding anything contained in any other law, rules or regulation to the contrary, for the time being in force, the following procedure for the adjustment of surplus staff would be followed:-

- (a) Before transferring an employee to the surplus pool, he should be given option by the concerned department.

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- (i) to proceed on retirement with normal retiring benefits under the existing rules;
- OR
- (ii) to opt for readjustment/absorption against a future vacancy of his status/BPS which may not necessarily be in his original cadre/department.
- (b) Those who opt for retirement would be entitled for usual pension and gratuity according to the existing Government Servants Pension and Gratuity Rules of the Provincial Government. Those who opt for absorption/re-adjustment, a category-wise seniority list will be caused in the surplus pool for their gradual adjustment against the future vacancies as and when occurred in any of the Government Departments. These adjustments shall be on seniority-cum-fitness basis. For this purpose, the seniority list will be caused category-wise with reference to their respective dates of appointment in the cadre. In case where dates of appointment of two or more persons are the same, the person older in age shall rank senior and shall be adjusted first.
- (c) Adjustment shall be made on vacant post pertaining to initial recruitment quota from those in the surplus pool in the following manner:-
- (i) In case of occurrence of vacancies in their corresponding posts in any Government Department/ Organization, the senior most employee in the surplus pool should be adjusted first.
- (ii) In case of cross cadre adjustment, the persons with such minimum qualification as prescribed in the relevant Service Rules for the post in question shall be adjusted keeping in view their seniority position.
- (iii) If an employee possesses the basic academic qualification but lacks the professional/technical qualification, he may be adjusted against such post subject to imparting the requisite training.
- (iv) (a) The surplus employees holding such posts which fall to promotion quota in about all the Departments, he shall remain in the surplus pool till the availability of a post in the parent department.
- OR
- (b) Where no equivalent post is available the civil servant may be offered a lower post in such manner, and subject to such conditions, as may be prescribed and where such civil servant is appointed to a lower post the pay being drawn by him in the post immediately preceding his appointment to a lower post shall remain protected.
- (v) <sup>84</sup>In case an employee already adjusted against a lower post is declared surplus again, he shall regain his original pay scale.
- (vi) <sup>85</sup> Surplus employees, who voluntarily opt, may be allowed adjustment in Autonomous/Semi-autonomous bodies with the concurrence of these bodies, where the job is pensionable. The Government will pay pension contribution for the period they rendered regular service under the Government.

<sup>84</sup> Sub para c (v) added to para 5 vide circular letter No.SORVI(E&AD)5-1/2005, dated 15.2.2006.

<sup>85</sup> Sub para c (vi) added to para 5.vide circular letter No.SORVI(E&AD)5-1/2005, dated 31.5.2006.

- (2)
- (d) If no suitable person is available in the surplus pool to be adjusted against the vacant/revised post, such a post would be filled up by initial recruitment manner after getting clearance from the E&AD.
- (e) <sup>86</sup>Surplus Staff in BPS-01 to 15 shall not be adjusted in the district other than their district of domicile.
- (f) To facilitate the adjustment of surplus staff, it will be incumbent upon the Administrative Department to take up the case with Finance Department for revival of the essential posts so retrenched as a result of general directive issued by Finance Department from time to time, giving cogent reasons/justification. Against the resultant revival/restoration of the post, the concerned Department will place a requisition on the E&AD for transferring of suitable surplus employee against the said post.
- (g) Unless the surplus employees in Class-IV are fully adjusted/ absorbed against their respective graded posts in various Government Departments/Organizations, the general policy of the Finance Department regarding conversion of BPS-1 & 2 posts to posts in fixed salary @ Rs.2000/- per month for contractual appointed should be restricted to the above extent.

#### 6. FIXATION OF SENIORITY

The inter-se seniority of the surplus employees after their adjustment in various Departments will be determined according to the following principles:-

- (a) In case a surplus employee could be adjusted in the respective cadre of his parent Department he shall regain his original seniority in that cadre.
- (b) In case, however, he is adjusted in his respective cadre but in a Department other than his parent Department, he shall be placed at the bottom of seniority list of that cadre.
- (c) In case of his adjustment against a post in a corresponding basic pay scale with different designation/nomenclature of the post, either in his parent Department or in any other department, he will be placed at the bottom of seniority list.
- (d) <sup>87</sup>In case of adjustment against a post lower than his original scale, he shall be placed at the top of seniority list of that cadre, so as to save him from being rendered surplus again & becoming junior to his juniors.

<sup>86</sup> (3) Sub para (e) added to para 5 vide circular letter No.SORVI/E&AD/5-1/2005, dated 19.1.2007.

<sup>87</sup> Sub para d added to para 6 vide circular letter No. SORVI(E&AD)5-1/2005, dated 15.2.2006

**NOTE:-**

In case the officer/official declines to be adjusted/absorbed in the above manner in accordance with the priority fixed as per his seniority in the integrated list, he shall lose the facility/right of adjustment/absorption and would be required to opt for pre-mature retirement from Government service.

Provided that if he does not fulfill the requisite qualifying service for premature retirement he may be compulsorily retired from service by the competent authority.

7. **COMPETENT AUTHORITY TO NOTIFY/ORDER ADJUSTMENT/ABSORPTION.**

After the transfer of services of surplus employee to a Department for adjustment/absorption against a vacant/revived post, the Competent Authority to notify/order his absorption/adjustment, shall be the respective appointing authority under the relevant rules for the post.

Provided that the decision of adjustment/absorption of surplus employees by the E&AD shall be binding upon the respective appointing authorities.

(Authority: letter NO.SOR-I(E&AD)1-200/98, Dated 8<sup>th</sup> June, 2001)

**Decision of the meeting of chief secretary with district coordination officers, on the issue of surplus pool.**

I am directed to refer to the subject noted above and to say that a meeting was held on 4.8.2001 in the Cabinet Room Civil Secretariat under the Chairman of Chief Secretary, NWFP to discuss the issues relating to adjustment of employees rendered surplus due to restructuring of the Government Departments and Devolution of Power Plan, 2000. The following decisions were taken in the said meeting:-

- i) Administrative Departments may reconsider adjustments already made against the available posts at District level. The guiding principle for reviewing the adjustment would be aimed at avoiding dislocation of the employees to the possible extent.
- ii) The DCOs will maintain the surplus pool of the employees, declared surplus in the District cadres and their subsequent adjustment against the vacant posts (District Cadres). It must be ensured that only the junior most employees in the scale in the cadre be declared surplus. At the stage of adjustment of Class-IV posts, the senior most be adjusted first. However, for the other posts besides seniority, the background of the individual and requisite experience of the posts shall be kept in view. The surplus pool of Divisional cadres be maintained by the DCOs posted at divisional headquarters.
- iii) The surplus pool of the employees of the Head Offices be maintained by the Head of the concerned Attached Department. Declaring employees surplus and their subsequent adjustment be made strictly according to the spirit of the policy of the Provincial Government issued vide circular letter No.SORI (S&GAD)1-200/98, dated 8.6.2001.



- iv) The surplus pool of the Secretariat be maintained by the Establishment Department in consultation with the Department concerned.
- v) The salaries of the surplus employees be disbursed through their relevant offices for the time being.
- vi) It was also felt that the sanctioned staff for the office of DCO and other offices is not sufficient. The ministerial staff has no appropriate tiers for the purpose of control and promotion i.e. Senior Clerk and Superintendent etc. The post of Chowkidar/ Sweeper does not exist in the office of DCOs and other offices. Even the other required staff does not meet the bare minimum. The DCOs will, therefore, forward the required proposal for consideration of Finance Department. The budget for the same can be arranged from the available savings due to phasing away of magistracy etc.
- vii) The LR&RD Department may reconsider the adjustment of the employees of the Local Council Board, so as to find out whether any such employees have been adjusted against the regular Government posts funded from the Provincial Consolidated Fund.
- viii) For adjustment of regular Class-IV (BS 1- 4) Government Servant in surplus pool, Finance Department may consider conversion of fixed pay/ contract posts into regular.

2. It is requested that decisions taken during the meeting held on 4.8.2001 may kindly be implemented by all concerned in letter and spirit and compliance report be furnished accordingly.

(Authority; letter NO.SOR-I(S&GAD)1-200/98 (Vol.I), Dated 13<sup>th</sup> August, 2001)

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Tentative Seniority List of J-Clerks/Store Keeper/ASK/ in and under Directorate E&SE, DCTE, Merged Tribal Districts & PITE Khyber Pakhtunkhwa corrected upto 10-6-2021

S.#	Name	Father's Name	Desig	Domicile	Date of Birth	Date of 1st appt in E&SE dept	D-O Appt as JC, ASK, SK in E&SED	Present place of posting	Remarks
1	Yousaf Shah	Midrarul Haq	J/Clerk	Swat	10-02-1968	21-10-1981	21-10-1981	GHS Qambar	
2	Abdur Rauf	Khoshab Din	J/Clerk	Kohat	13-03-1962	04-09-1986	04-09-1986	GHS Barh	refused promotion w.e.f 3-11-2015
3	Iran Badshah	Khiali Khan	J/Clerk	Karak	21-03-1969	23-10-1986	23-10-1986	DEO(M) Karak	
4	Amir Zada	Mohammad Hassan	J/Clerk	BAJOUR	15-05-1964	22-11-1986	22-11-1986	GHS Loi Sam Bajour Agcy	
5	Nazir Shah	Raheem Shah	J/Clerk	Haripur	13-02-1967	06-12-1986	06-12-1986	GGHS Ghazi Hamlet	superseded forever beause of twice refusal
6	Saifur Rehman	Fazlur Rehman	J/Clerk	Peshawar	21-04-1962	05-03-1987	05-03-1987	GHS: Urmar Bala Peshawar	superseded w.e.f 4-8-2017
7	Mir Hussain	Faqir Hussain	J/Clerk	Nowshera	01-01-1967	08-03-1987	08-03-1987	GHS, Manahi	superseded w.e.f 4-8-2017
8	Muhammad Sultan	Ali Khan	J/Clerk	Karak	02-02-1966	01-05-1987	01-05-1987	GHS, Shahidan Banda	
9	Waheedullah	Manak Khan	J/Clerk	FR Bannu	25-11-1967	11-05-1987	11-05-1987	GHS Saadullah FR, Bannu	
10	Iltaf Hussain	Nazir Hussain	J/Clerk	Orakzai	11-11-1968	21-05-1987	21-05-1987	GHS And Khel Orakzai Agy	
11	Bram Ullah	Yaqeen shah	J/Clerk	Nowshera	04-11-1969	01-10-1987	01-10-1987	GHS, Aza Khel Bala	
12	Zahoor Hussain	Gulab Hussain	J/Clerk	Kurram	01-07-1966	08-12-1987	08-12-1987	GHS Kung Aitzai Kurram	
13	Fazal Subhan	Sarfraz Khan	J/Clerk	Bannu	20-09-1965	16-12-1987	16-12-1987	GHS Nar Jaffar Khan Bannu	new entry
14	Khitab Gul	Sardar Khan	J/Clerk	NWA	18-02-1966	25-05-1988	25-05-1988	GHS Jaj Mohammad Kor NWA	
15	MUHAMMAD IQBAL	KHAN SHER	J/Clerk	Pesh	22-06-1968	10-08-1988	10-08-1988	GHSS DAAG	
16	ZAKI ULLAH	FAZAL/E/REH	ASK	Pesh	20-10-1962	12-10-1988	12-10-1988	GTHSS GULBAHAR	
17	IRSHAD AHMED	FAQEER MUHAMMAD	J/Clerk	Pesh	16-03-1968	24-11-1988	24-11-1988	GGHS Shaikh Abad	superseded w.e.f 3-7-2017
18	MUHAMMAD IBRAHIM	Malik HABEEB KHAN	J/Clerk	Pesh	01-01-1967	26-11-1988	26-11-1988	GHSS CHAMKANI	superseded w.e.f 10-7-2017
19	Muhammad Jan	Murad Bakhsh	J/Clerk	DI Khan	16/02/1962	19/09/1989	19/09/1989	GG.H.S Spinkai DI Khan	
20	Altaf Alam	Ghousud/Din	J/Clerk	SWA	15-08-1970	15-08-1989	15-08-1989	GHS Nano SWA	
21	SADDAQAT KHAN	AMRAT KHAN	J/Clerk	Pesh	05-03-1969	28-08-1989	28-08-1989	GGHSS CHAMKANI	superseded w.e.f 10-7-2017
22	Tanveer Mujeeb	Mehboob Alam	J/Clerk	Abbottabad	17-05-1970	17-09-1989	17-09-1989	GHS Nareela	superseded w.e.f 7-12-2015
23	Amjad Sohail	Mohammad Rafique	J/Clerk	FR Peshawar	08-03-1971	16-10-1989	16-10-1989	GHS Faridi FR, Peshawar	
24	Imtiaz Hussain	Ajab Khan	J/Clerk	Abbottabad	15-02-1965	01-12-1989	01-12-1989	GHS Moolia	superseded w.e.f 24-11-2015
25	Muhammad Afzal	Umeer Khan	J/Clerk	Swat	15-03-1962	09-12-1989	09-12-1989	GHSS Fatahpur	
26	MANZOOR ALAM	UMAR KHAN	J/Clerk	Pesh	12-01-1968	10-01-1990	10-01-1990	GHS Beri Bagh	superseded w.e.f 3-8-2017
27	Jehanzeb	Rahim Jan	J/Clerk	BAJOUR	03-02-1968	10-05-1990	10-05-1990	GHS Zoor Bander Bajour	
28	Rashid Ahmad	Habib/Ur/Rahman	J/Clerk	Shangla	01-04-1979	26-05-1990	26-05-1990	GHSS Shahpur	
29	SOHAIL AHMAD	ABDUL QAYUM	J/Clerk	Pesh	28-01-1969	05-06-1990	05-06-1990	GGHS Shaheen Camp	
30	NOOR REHMAN	ASLAM KHAN	J/Clerk	MALAKAND	21-04-1966	06-08-1990	06-08-1990	Malakand	refused promotion w.e.f 29-9-2017
31	Jahan Zeb Khan	Mir Ahmad Khan	J/Clerk	Karak	05-06-1970	14-01-1991	14-01-1991	Karak	
32	Azhar Mehmood	Muhammad Suleman	J/Clerk	Abbottabad	29-05-1969	16-01-1991	16-01-1991	GHSS Nawanshehr	
33	Mashkooor Ahmad	Abdul Shakoor	J/Clerk	Mansehra	28-01-1965	19-01-1991	19-01-1991	GHS No.2 Manshra	superseded w.e.f 30-5-2017
34	M. Tariq Mahmood	Israr ud Din	J/Clerk	Nowshera	04-08-1967	01-02-1991	01-02-1991	GHSS, Risal Pur	
35	Abdul Wali	Gul Wali Khan	J/Clerk	FR, Bannu	12-03-1971	02-02-1991	02-02-1991	GHS Sitti Killa, FR, Bannu	
36	M. JAHANGIR	SHER AFZAL	J/Clerk	Pesh	12-10-1966	07-03-1991	07-03-1991	GGHS Irrigation	
37	Akhtar Zaman	Hayat Ullah	J/Clerk	Karak	02-04-1968	09-05-1991	09-05-1991	SDEO(F) T/Nasrati	

Amma  
B<sup>a</sup>

301	Ashfaq Ahmad	Muhammad Zamin	J/Clerk	Mardan	03-03-1976	28-02-1991	01-08-2002	GHSS, Baghicha Dheri	
302	S.Imtiaz Hussain	Sayed Ali	J/Clerk	FATA	15-04-1982	16-08-2002	16-08-2002	GHS Boshera Kurram Agency	
303	Abdul Qadir	Malik Hassan	J/Clerk	FATA	20-09-1982	16-08-2002	16-08-2002	GHS Dosali NWA	
304	Fazli Rahim	Fazli Ghani	J/Clerk	FATA	12-10-1976	31-08-2002	31-08-2002	GHS Hamud Khan Kullu M. Agency	
305	Shoukat Hussain	Munsif Khan	J/Clerk	Abbottabad	15-11-1973	18-05-1992	26-09-2002	GHS: Mokar Kalan A.A.	
306	ANWAR IQBAL	FARAMOOSH	J/Clerk	MALAKAND	06-08-1974	07-11-2002	07-11-2002	Malakand	
307	Asad Ali	Sardar Ali	J/Clerk	FATA	12-04-1981	15-12-2002	15-12-2002	GHS Biland Khel Or: Agency	
308	Muhammad Naveed Iqbal	Muhammad Ibrahim	J/Clerk	Kohat	01-04-1986	08-03-2003	08-03-2003	GHSS Shakardara	
309	Miaz Ali Shaha	Zarin Shah	J/Clerk	BUNER	25-03-1976	05-04-1999	17-03-2003	GHS Khrai	
310	Dilshad Bibi	Nasir Shah	ASK	D/WK	10-03-1963	26-09-1982	25-04-2003	GGHS No/1 DiKhan	
311	MUHAMMAD ALI KHAN	SARDAR ALI KHAN	J/Clerk	LAKKI	04-01-1969	15-07-2003	15-07-2003	GHSS NAURANG	
312	Najmuddin	Shamsuddin	J/Clerk	FATA	13-02-1985	22-08-2003	22-08-2003	GHS Kama Dara Bajour Agency	
313	Inam Shah	Baghi Shah	J/Clerk	Charsadda	03-05-1979	28/08/2003	28/08/2003	GHS Danish Kool Mohmand Tribble District	record entered in the light of DEO Mohmand letter vide No 2417 dated 11/08/2020.
314	Raza Shah	Miranshah	J/Clerk	FATA	25-12-1971	28-08-2003	28-08-2003	GHS Landi Baloch FR, Tank	
315	Zar Karim	Mohammad Khan	J/Clerk	FATA	20-04-1977	28-08-2003	28-08-2003	GHS Palosi Orakzai Agency	
316	S.Jadil Shah	S.Mohd.Sibtan	J/Clerk	FATA	20-05-1977	28-08-2003	28-08-2003	GHS Daradar Orakzai Agency	
317	Mudasir Javed	Mohammad Javed	J/Clerk	FATA	03-01-1981	28-08-2003	28-08-2003	GHS Spidar Orakzai Agency	
318	Anwarullah Shah	Mohd Ibrahim	J/Clerk	FATA	12-04-1982	28-08-2003	28-08-2003	GHS Pandiali M. Agency	
319	Anwar Ali	Tawez Khan	J/Clerk	FATA		28-08-2003	28-08-2003	GGHS Mir Bak Orakzai Agency	
320	Mohammad Janan	Moh Hakim Shah	J/Clerk	FATA		28-08-2003	28-08-2003	GHS Ghiljo Orakzai Agency	
321	Arbab Khan	Dir Nawab Khan	J/Clerk	FATA	09-03-1973	01-09-2003	01-09-2003	GHS Chappari FR, Bannu	
322	Mohammad Tariq	waris Khan	J/Clerk	FATA	10-05-1973	01-09-2003	01-09-2003	GHS Sandu Khel M. Agency	
323	Nasir Khan	Sardar Khan	J/Clerk	FATA	15-02-1975	01-09-2003	01-09-2003	GHS Kandow FR, Peshawar	
324	Falak Naz	Sher Nawaz	J/Clerk	FATA	15-02-1976	01-09-2003	01-09-2003	GHS Miranshah NWA	
325	Mouhammad Tufail	Sadi Bad Shah.	J/Clerk	FATA	17-03-1976	01-09-2003	01-09-2003	GHS Kaniguram SWA.	
326	Mushtaq Hussain	Ali Akbar	J/Clerk	FATA	06-02-1977	01-09-2003	01-09-2003	GHS Manatoo Kurram Agy	
327	Pervaiz Khan	Abdur Rashid	J/Clerk	FATA	10-03-1977	01-09-2003	01-09-2003	GGHS Spelano Kas Jamrud Khar Trib. Dist.	
328	Khalil Mohammad	Permana Khan	J/Clerk	FATA	04-04-1977	01-09-2003	01-09-2003	GHS Karama SWA	
329	Sabir Hussain	Shakir Hussain	J/Clerk	FATA	03-03-1978	01-09-2003	01-09-2003	GHS Chappari Kurram Agy	
330	Bahader Sher	Mir Alam Khan	J/Clerk	FATA	01-04-1979	01-09-2003	01-09-2003	GHS, Makin Challari SWA	
331	Arbab Alam	Mustaqeem Khan	J/Clerk	FATA	10-04-1980	01-09-2003	01-09-2003	GHS Ahmad Wam SWA	
332	Ibrar Hussain	Noor Mohammad	J/Clerk	FATA	03-02-1981	01-09-2003	01-09-2003	GHS Makuzai Kurram Agency	
333	Mukamil Khan	Ismail	J/Clerk	FATA	02-02-1982	01-09-2003	01-09-2003	GHS Qamar Din Kor M Agency	
334	Shah Mohammad	Miradam Khan	J/Clerk	FATA	20-09-1982	01-09-2003	01-09-2003	GHSS Spulga NWA	
335	Asfand Yar	Sangtiaz Khan	J/Clerk	FATA	12-03-1983	01-09-2003	01-09-2003	GHSS Nadir Biddin Khel FR, Bannu	
336	Drumullah	Zahidullah	J/Clerk	FATA	11-11-1989	01-09-2003	01-09-2003	GHS Chappari FR, Bannu	
337	Wahid Ullah	Dawlat Khan	J/Clerk	Mohmand Agy	07-03-1983	28-08-2003	25-09-2003	GGHS Inmad Ullah M. Agency	
338	Asghar gul	hayat gul	J/Clerk	FATA	06-02-1973	02-10-2003	02-10-2003	FATA	
339	Ibrahim Khan	Ziarat Gul	J/Clerk	Peshawar	15-06-1981	02-10-2003	02-10-2003	DE (FATA) Peshawar	
340	Fathullah	Abdul Baqi	J/Clerk	Dir (U)	14-09-1978	01-01-2004	01-01-2004	Dir (U)	
341	Said Lawar Shah	Azhar Shah	J/Clerk	BUNER	17-01-1969	17-01-1987	04-01-2004	DDO (F) Office	
342	Khan Zaman	Said Zamin Khan	J/Clerk	Dir (U)	03-05-1970	04-01-2004	04-01-2004	Dir (U)	
343	Mohammad Ilyas	Mohammad Shuaib	J/Clerk	Dir (U)	01-11-1973	06-01-2004	06-01-2004	Dir (U)	
344	Mohammad Ismail	Gul Hassan	J/Clerk	Dir (U)	28-02-1978	06-01-2004	06-01-2004	Dir (U)	

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1620	Ijaz Ali	Mumtaz Ali	J/Clerk	Swabi	06-01-1992	27-05-2019	27-05-2019	GGHSS Baja	new entry
1621	Junaid Nawaz	Muhammad Nawaz	J/Clerk	Haripur	02-01-1994	28-05-2019	28-05-2019	GGHS Kailag	entry new
1622	Zubair Ahmad	Gulistan	J/Clerk	Charsadda	15-03-2000	28-05-2019	28-05-2019	GHS Shahbaz Khan Shahzad Charsadda	new entry
1623	Syed Ali Asghar Shah Gillani	Shah Faraz	J/Clerk	Haripur	30-11-1988	29-05-2019	29-05-2019	GGHS Ghani Hamlet	new entry
1624	Mubarak Hussain	Wasal Khan	J/Clerk	Charsadda	12-10-1985	08-06-2019	08-06-2019	USKSHSS Umanza Charsadda	new entry
1625	Amjad Iqbal	Gohar Ali Khan	J/Clerk	Peshawar	31-05-1994	21-06-2019	21-06-2019	Directorate of E&SE	new entry
1626	Muhammad Zohaib	Muhammad Sohail	J/Clerk	Swabi	14-01-2000	05-07-2019	05-07-2019	GGHSS Kalabat	new entry
1627	Mushtaq Ahmad	Rambail Khan	J/Clerk	Mohmand	12-03-2001	26-12-2019	26-12-2019	DEO Mohamud	new entry
1628	Ibrar Ul Haq	Jan Ali	J/Clerk	Charsadda	17-03-1997	07-08-2019	07-08-2019	GHS Zarbab Gami Charsadda	new entry
1629	Izz Hussain	Anwar Hussain Hamid	J/Clerk	Charsadda	01-06-1996	05-10-2019	05-10-2019	GHS Hafeem Zai Shabqadar Cbd	new entry
1630	Faiz Ul Haq	Jan Ali	J/Clerk	Charsadda	11-05-1989	30-07-2015	15-10-2019	GHSS Manga Dargai	new entry surplus staff of ehhsab commission kpk and adjusted as J/C
1631	Osama Rahman	Qamar Rahman	J/Clerk	Charsadda	28-07-1999	17-10-2019	17-10-2019	GHS Mera Gul Abad Charsadda	new entry
1632	Hisam Ali Shah	Nizam Shah	J/Clerk	Charsadda	06-06-2000	01-12-2019	01-12-2019	GHS Aziz Abad Charsadda	new entry
1633	Atta Ullah Shah	Sami Ul Haq	J/Clerk	Hangu	15-05-1993	09-12-2019	09-12-2019	GHSS Darsamand	new entry
1634	Jamshid Ali	Khan Pur	J/Clerk	charsadda	09-05-1972	01-06-1986	18-12-2019	GHS Darazak Shabqadar Charsadda	new entry
1635	Salman Malik	Sher Malik	J/Clerk	Mohmand	23-06-1989	13-12-2019	23-12-2019	GHS Qamar Din Mohammad	new entry
1636	Mian Haseeb Ur Rasheed	Mian Mamoon Ur Raheed	J/Clerk	Nowshera	18/07/1995	08-08-2020	08-08-2020	DEO (M) Nowshera	New Entry

Deputy Director (F&A)  
Directorate E & SE, Khyber Pakhtunkhwa  
Peshawar.