Sr. No.	Date of order/ proceedings	Order or other proceedings with signature of Judge/ Magistrate
1	2	3
1.		KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR. Service Appeal No. 352/2015 Muhammad Shahid Versus Director of Education (FATA) KPK Peshawar etc. JUDGMENT
	21.10.2015	PIR BAKHSH SHAH, MEMBER.- .. Appellant with counsel (Mr. Fazal Shah Momand, Advocate), Government Pleader (Mr. Muhammad Jan) and private respondent No. 6 with counsel (Mr. Ibadur Rahman, Advocate) present. 2. Appellant Muhammad Shahid, PET (BPS-15) was in GHS Paindi Lalma. Vide order dated 22.07.2014, he was transferred and posted as Agency Physical Supervisor Khyber Agency at Jamrud on the retirement of Muhammad Gul, then Agency Physical Supervisor. Lateron vide impugned order dated 27.1.2015, the appellant was sent back to his original post of PET by cancelling his previous order and in his place Mr. Naeem Khan, Agency Physical Supervisor was transferred from Bajaur Agency to Khyber Agency. Feeling aggrieved, the appellant submitted his departmental appeal before the Director of Education (FATA) but in vain, hence this appeal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974.

3. The learned counsel for the appellant submitted that the post of PET and APS (BPS-15) are Agency Cadre posts which are interchangeable and as the appellant has not yet completed his tenure, therefore, the impugned order is against rules, government posting/transfer policy. He also submitted that unlike private respondent No. 6, appellant is the resident of Khyber Agency, therefore, on this score, is having more entitlement to the disputed post than private respondent No. 6.

4. To resist this appeal, learned counsel for private respondent No. 6 and learned Government Pleader submitted that the appellant basically belongs to the cadre of PET which is agency cadre post, different from the cadre of APS, a sub-cadre post of the provincial level and despite the fact that presently both are in BPS-15 as post of PET was upgraded from BPS-9 to 15 whereas the post of APS is still in process of upgradation, They are not interchangeable. They argued that as a suitable incumbent was not available at the time of retirement of Mr. Gul Muhammad, therefore, the appellant was adjusted on the post as stop-gap-arrangement. They submitted that respondent No. 6 is badly suffering because the respondent department is not paying salary to the private respondent No. 6 because of this appeal which may be decided as priority basis.

5. We have heard arguments of the learned counsel for the parties and perused the record with their assistance.

6. In the light of arguments and perusal of the record, the Tribunal is convinced that the cadres of both the posts of APS and PET are distinct and not interchangeable despite the fact that both are presently in BPS-15. This may also be observed that in view of the above fact the appellant seems to have been transferred to the post of APS as a stop-gap-arrangement. The impugned order is not perverse or against rules, hence there is no occasion of any interference. Consequently it is held that the appeal being devoid of merit is dismissed. Parties are left to bear their own costs. File be consigned to the record.

ANNOUNCED
21.10.2015.

(PIR BAKHSH SHAH)
MEMBER

(ABDUL LATIF)
MEMBER

01.10.2015 Counsel for the appellant, Mr. Daud Jan, Supdt: alongwith Mr. Ziaullah, GP for official respondents No. 1 to 5 and counsel for private respondent No. 6 present. Counsel for the appellant requested for adjournment. To come up for rejoinder and arguments on 19-10-15. Status-quo be maintained.

Member Member

19.10.2015 Appellant in person, Mr. Ziaullah, GP with Daud Jan, Supdt. on behalf of official respondents and private respondent No. 6 with Mr. Ibadur Rahman, Advocate/counsel present. Rejoinder submitted by the appellant. Copies handed over to the learned GP and counsel for private respondent No. 6. The learned counsel for the appellant is not available. On the other hand, learned counsel for private respondent No. 6 agitated that the appellant prolonging the proceedings as he has got stay order as a result whereof private respondent No. 6 is deprived of his salary. Since the matter is salary is one of the incidental issues therefore, be treated on priority basis. Last opportunity is given. Office is directed to place the case at the top of cause list. To come up for arguments on _____. Till then status quo be maintained

Member Member

6 12.06.2015 Appellant with counsel, Mr. Yaseen Afridi, Legal Representative alongwith Ad dl: A.G fo r official respondents No. 1 to 5 and private respondent No. 6 with counsel present. Written reply not submitted. Requested for further adjournment. Last opportunity granted. To come up for written reply/comments on 3.7.2015 before S.B. Status-quo be maintained.

Chairman

7 03.07.2015 Counsel for the appellant and Mr. Daud Jan, Supdt. alongwith Addl: A.G for respondents present. Written replies by official respondents No. 1 and 2 and private respondent No. 6 submitted. Learned Addl: A.G relies on the reply of official respondents No. 1 and 2 on behalf of respondent No. 3 to 5. The appeal is assigned to D.B for rejoinder and final hearing for 27.8.2015. Status-quo be maintained.

Chairman

27.08.2015 Appellant with counsel, Mr. Zialluah, GP for official respondents and private respondent No.6 in person present. Arguments could not be heard due to Learned Member (Judicial) is on leave. To come up for rejoinder and Arguments on 31.10.2015. Status-quo be maintained.

Member

3. 29.04.2015 None present for appellant. The appeal be relisted for preliminary hearing for 30.4.2015 before S.B.

Chairman

4. 30.04.2015 Counsel for the appellant present. Learned counsel for the appellant argued that that appellant is serving as Agency Physical Supervisor and was transferred to Khyber Agency vide order dated 22.7.2014 who assumed charge on 1.8.2014 where-after his transfer order was cancelled and appellant posted as Agency Physical Supervisor at Bajaur Agency vide impugned order dated 27.1.2015. That the appellant preferred departmental appeal against the said order on 5.2.2015 which was rejected on 9.3.2015 and hence the instant service appeal on 9.4.2015.

That the transfer of the appellant is premature and not made by the competent authority.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply for 26.5.2015 before S.B. Notice of stay application be also issued for the date fixed. Till then status-quo be maintained.

Chairman

Appellant Deposited Security & Process Fee

5. 26.05.2015 Appellant in person, Mr. Daud Jan, Supdt. alongwith Addl: A.G for official respondents No. 1 to 5 and private respondents No. 6 in person present. Requested for adjournment. To come up for written statement on 12.6.2015 before S.B. Till then status-quo be maintained.

Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. 352 /2015

S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	21/4/2015	As per order of the Hon'ble Court the present appeal filed by Muhammad Shahid through Mr. Fazal Shah Mohmand Advocate be entered in the Institution Register and put up to the Worthy Chairman for further order please. REGISTRAR
2-	27-4-15	This case is entrusted to S. Branch for preliminary hearing to be put up thereon 29-4-15 CHAIRMAN

This case is submitted to the Hon,ble Chairman for hearing of objection by Counsel for the appellant on observation of this office.

Registrar

13.04.2015 Counsel for the appellant present. Requested for adjournment. Adjourned to 28.4.2015 for arguments on office objection before S.B.

Chairman

17.4.2015 Counsel for the appellant present. Submitted application for early hearing of the appeal. Allowed. To come up for arguments on office objection before S.B II on 20.4.2015.

Chairman

20.04.2015 Counsel for the appellant present. Arguments at preliminary stage heard. It transpired that departmental appeal being filed vide order dated 9.2.2015. Hence rejected and thus decided. The case be sent to registrar to process it and instituted in the relevant register.

Member

The appeal of Mr. Muhammad Sahid Agency Physical supervisor received to-day i.e. on 09.04.2015 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

Copy of proper rejection order of departmental appeal mentioned in para-5 of the memo of appeal is not attached with the appeal which may be placed on it.

No. 472 /S.T,

Dt. 10/4 /2015

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Fazal Shah Mohmand Adv. Pesh.

Sir,

Resubmitted with request that the order was made on the paper of departmental appeal as filed as evident from the same, so the appeal may kindly be fixed before the Tribunal.

10-4-15

BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR

Service Appeal No 352 /2015

Muhammad Shahid.....Appellant

VERSUS

Director and Others.....Respondents

INDEX

S No	Description of Documents	Annexure	Pages
1.	Service appeal with affidavit		1-3
2.	Application for suspension of impugned Order with affidavit		4-5
3.	Copy of Notification dated 22-07-2014 and letter dated 21-07-2014	A & B	6-7
4.	Copy of Notification dated 22-07-2014 & Certificate of transfer of charge	C & D	8-9
5.	Copy of Order dated 27-01-2015	E	10-
6.	Copy of departmental appeal & Order on the same	F	11
7.	Copy of Notification dated 02-02-2015	G	12
8.	Wakalat Nama		13

Dated:-09-04-2015

Appellant

Through

Fazal Shah Mohmand
Advocate, Peshawar

OFFICE:-
Cantonment Plaza Flat 3/B, Khyber Bazar Peshawar Cell # 0301 8804841

(1)

BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR

K.P.K. Peshawar
Service Tribunal
Diary No. 321
Dated 09-4-2015

Service Appeal No 352 /2015

Muhammad Shahid Agency Physical Supervisor (BPS-15), Khyber Agency.....**Appellant**

VERSUS

1. Director Education FATA, FATA Secretariat Warsak Road Peshawar.
2. Agency Education Officer at Jamrod Khyber Agency.
3. Political Agent Khyber Agency at Khyber House Peshawar.
4. Secretary Social Sector Department, FATA Secretariat Peshawar.
5. Secretary, Elementary and Secondary Education, Govt. of KPK Peshawar.
6. Naeem Khan Agency Physical Supervisor, at the office of Agency Education Officer Bajaur Agency .....**Respondents**

APPEAL U/S 4 0F THE KPK SERVICE TRIBUNAL ACT 1974 AGAINST THE ORDER DATED 09-03-2015 PASSED BY RESPONDENT NO 1 WHERE BY DEPARTMENTAL APPEAL OF THE APELLANT FILED AGAINST THE ORDER DATED 27-01-2015 WHEREBY THE TRANSFER ORDER IN RESPECT OF THE APPELLANT AS AGENCY PHYSICAL SUPERVISOR KHYBER AGENCY WAS CANCELLED, HAS BEEN FILED.

PRAYER:-

On acceptance of this appeal the impugned order dated 09-03-2015 of respondent No 1 and Order dated 27-01-2015, may kindly be set aside and the appellant may kindly be ordered to be transferred as Agency Physical Supervisor Khyber Agency.

Respectfully Submitted:-

Filed today
Registrar
9-4-15

1. That the appellant is the bonafide resident of Khyber Agency, has qualified his Master Degree in Urdu and Senior Diploma in Physical Education (SDPE) and was appointed as Physical Education Teacher on 20-12-2000 and since then he performed his duties as assigned and with honesty and full devotion and to the entire satisfaction of his superior officers.

2. That the appellant while posted as Physical Education Teacher Khyber Agency, the Agency Physical Supervisor of Khyber Agency namely Muhammad Gul got retired from service w.e.f. 31-07-2014 vide Notification dated 22-07-2014. consequently

the appellant was recommended by respondent No 1 to respondent No 2, to be posted as Agency Physical Supervisor BPS-15 vide letter dated 21-07-2014, which was accordingly approved on the same date. **(Copies of Notification dated 22-07-2014 & letter dated 21-07-2014 are attached as Annexure A & B).**

3. That accordingly the appellant was transferred as Agency Physical Supervisor Khyber Agency vide Notification dated 22-07-2014 and he took the charge on 01-08-2014. **(Copy of Notification dated 22-07-2014 and Certificate of transfer of charge is enclosed as Annexure C & D).**

4. That astonishingly and illegally the transfer Order of the appellant as Agency Physical Supervisor Khyber Agency was cancelled by respondent No 1 vide Order dated 27-01-2015 and respondent No 6 was transferred in his place. **(Copy of the Order dated 27-01-2015 is enclosed as Annexure E).**

5. That the appellant submitted Departmental appeal, on 05-02-2015, which was filed on 09-03-2015. **(Copy of appeal and order on the same is enclosed as Annexure F).**

6. That the impugned order dated 09-03-2015 of respondent No 1 and order dated 27-01-2015, are against the law, facts and principles of justice on grounds inter alia as follows:-

GROUNDS:-

A. That the impugned orders are illegal and void ab-initio.

B. That the impugned order is without jurisdiction and legal authority, as respondent No 3 is the competent authority and not respondent No 1.

C. That the orders are based on nepotism and favoritism besides politically oriented and thus not maintainable in the eyes of law.

D. That even the same is premature as the appellant was transferred just after about five months of his posting without any justification.

E. That even otherwise the post is Agency Cadre post and respondent No 6 being belonging to Waziristan Agency can not as such be posted in Khyber Agency. **(Copy of Notification dated 02-02-2015 is enclosed as Annexure G).**

F. That even respondent No 6 was transferred with his sweet will from Khyber Agency to Bajaur Agency and even his transfer order is also premature.

G. That even there is no complaint of any sort against the appellant.

H. That mandatory provisions of law have been violated by the respondents while taking action against the appellant.

I. That the appellant has about 15 years of service with unblemished service record and has not relinquished the charge yet.

J. That the appellant seeks the permission of this honorable Tribunal for further/additional grounds at the time of arguments.

It is therefore prayed, that appeal of the appellant, may kindly be accepted as prayed for.

Dated:-09-04-2015

Appellant

Through

Fazal Shah Mohmand
Advocate, Peshawar

AFFIDAVIT

I, Muhammad Shahid Agency Physical Supervisor (BPS-15), Khyber Agency, do hereby solemnly affirm and declare on oath that the contents of this **Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.

DEPONENT

Identified by

Fazal Shah Mohmand
Advocate Peshawar

KHALID MAHMOOD ADVOCATE
ATTESTED
NOTARY PUBLIC
PESHAWAR HIGH COURT
9-4-15

(4)

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHAWA, PESHAWAR.

Service Appeal No:- ____________/2015

Muhammad Shahid **Versus** Director & Others

.... Petitioners ....Respondents

✧✧✧✧✧✧✧✧✧✧✧✧✧✧✧✧✧✧✧✧✧✧✧✧✧✧✧✧✧✧✧✧✧

APPLICATION FOR THE SUSPENSION OF IMPUGNED ORDER DATED 27/01/2015 AND 09/03/2015, THEREBY MAINTAINING STATUS QUO.

Respectfully Sheweth:-

1. *That the above noted Service Appeal is being filed before this Honourable Tribunal, in which no date of hearing has yet been fixed.*

2. *That the petitioner/appellant has got a good prima facie case in his favour, and is sanguine about its success.*

3. *That the balance of convenience also lies in favour of the petitioner/appellant.*

4. *That if the orders dated 27/01/2015 & 09/03/2015 are not suspended, than the petitioner/appellant would suffer irreparable loss.*

5. *That the facts and grounds of the Service Appeal may kindly be read as an integral part of this application.*

It is, therefore, respectfully prayed that on acceptance of this application, the impugned orders dated 27/01/2015 & 09/03/2015 may kindly be suspended, till the final decision of the case.

Dated:- 09/04/2015

Petitioner/Appellant

Through:-

Fazal Shah Mohmand,
Advocate, Peshawar.

AFFIDAVIT:-

I, ***Muhammad Shahid*** *Agency Physical Supervisor, Khyber Agency do hereby solemnly affirm and declare on oath that the contents of this accompanying* ***application*** *are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.*

DEPONENT

KHALID MAHMOOD ADVOCATE
ATTESTED
NOTARY PUBLIC
PESHAWAR HIGH COURT
9-4-15

6 A

OFFICE OF THE AGENCY EDUCATION OFFICER KHYBER AGENCY JAMRUD

NOTIFICATION

Consequent upon with the approval of Political Agent Khyber Agency Mr. Muhammad Gul S/O Muhammad Zali Agency Physical Supervisor (BPS-15) ADEO Office Khyber Agency is hereby allowed to retire from services with effect from 31.07.2014 (A.N) on his own request after completion of 30 Years qualifying service

Agency Education Officer,
Khyber Agency Jamrud

Endstt No. 6260-63 dated 22/07/14

Copy of the above is forwarded to the:

1. Director Education FATA, Peshawar.
2. Political Agent Khyber Agency.
3. Agency Accounts Officer Khyber Agency.
4. Supdtt: AEO Office
5. Official Concerned.

Agency Education Officer,
Khyber Agency Jamrud

Attested
Adv.

7

B

AGENCY EDUCATION OFFICE KHYBER
PHONE. 091-5820265 FAX 091-5820265
NO. 6256 DATED 21/07/2014

To

The Political Agent,
Khyber Agency.

Subject: **Approval of APS in Khyber**

Memo;

Consequent upon the retirement of Mr Muhammad Gul APS BPS-15 Mr. Muhammad Shahid PET BPS-15 may kindly be approved to be posted as APS in Khyber.
Mr. Muhammad Shahid PET will also run the Computer EMIS Cell, being proficient in MS Office & Coral Draw.

Agency Education Officer,
Khyber Agency at Jamrud

Allowed
21/7

Attested

8

e

AGENCY EDUCATION OFFICE KHYBER
PHONE. 091-5820265 FAX 091-5820265
NO. 6324 DATED 22/07/2014

NOTIFICATION

Consequent upon the retirement of Mr. Muhammad Gul APS w.e.f 31 July 2014 and subsequent approval of Political Agent Agency Khyber Agency Mr. Muhammad Shahid PET BPS 15 is hereby transformed from GHS Paindi Lalma Khyber Agency and posted as Agency Physical Supervisor Khyber agency at Jamrud w.e.f the retirement of Mr. Muhammad Gul APS.

(Atiq-ur-Rahman)
Agency Education Officer
Khyber Agency at Jamrud

Endst: No. 6325-34 Dated 22/07/2014

Copy of the above is forwarded to the:-

01. *Secretary Social Sector Department FATA Secretariat Peshawar.*
02. *Political Agent Khyber Agency at Khyber House Peshawar.*
03. *Director Education FATA FATA Secretariat Peshawar.*
04. *Director Sports FATA FATA Secretariat Peshawar.*
05. *Account Officer Khyber at Jamrud.*
06. *Head Master GHS Paindi Lalma Khyber Agency.*
07. *Officials Concerned.*
08. *Superintendent local office.*

AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD

Attested

9

N.W.F.P. A/Try. 42—A GS&PD. NWFP. 618—F.S. 5000 P. of 100 L.—14.11.96—(20)

GOVERNMENT OF NORTH-WEST FRONTIER PROVINCE

CERTIFICATE OF TRANSFER OF CHARGE

Certified that I, Mohammad Shahid

have this day before/after noon taken over/relinquished charge of the office AEO Khyber Agency at Jamrud

with reference to the Order of the N.-W.F.P. Government

No. 6324-35 Dated 22-07-2014 19

transferring Mr. Mohammad Gul is retired.

to

2. Particulars of Cash and Important/Secret/Confidential documents handed over/taken over are noted on the reverse.

Signature of relieved Government Servant

Station. AEO office Khyber Agency at Jamrud

Designation

Signature of Government Servant receiving charge

Dated 4/08/2014

Designation Agency physical supervisor.

Endst. No. 6324-35 Dated 22-7-2014 19

From Agency Education Officer Khyber Agency

To

Agency Education Officer, Khyber Agency at Jamrud

1. The Accountant-General, N.W.F.P., Peshawar.
2. P.A Khyber Agency At Khyber Agency
3. D.E. FATA: FATA Secretariat Peshawar.
4. Account Office Khyber Agency.
5. Director Sports FATA FATA Secretariat Peshawar.

The charge of the Office of Agency Physical Supervisor

was transferred from Mr. Mohd Gul

to Mr. Mohd Shahid

on the fore noon of the 1/8/14

Attested

(10) E

DIRECTORATE OF EDUCATION, FATA SECRETARIAT, PESHAWAR

TRANSFER/CANCELLATION

Mr Naeem Khan APS Office of the AEO Bajour Agency is hereby transferred in his own pay & scale to the Office of the Agency Education Officer Khyber Agency against vacant post from the date of his taking over charge vice S/No.2 in the interest of public service.

2 Transfer order in respect of Muhammad Shahid PET GHS Paindi Lalma Khyber Agency issued vide AEO Khyber Endst: No 6325-34 dated 22/07/2014 as Agency physical supervisor is hereby cancelled.

NOTE:-

1 Charge report should be submitted to all concerned

2 TA/DA etc is not allowed

DIRECTOR EDUCATION (FATA)

Endst: No. 1079-85 /A-12/ Naeem Khan APS

Dated Pesh: the 27/1 2015

Copy forwarded to the:-

1 Agency Education Officer, Bajour Agency at Khar

2 Agency Education Officer Khyber Agency at Jamrud

3 Agency Accounts Officer, Bajour Agency at Khar

4 Agency Accounts Officer Khyber Agency at Jamrud

5 Headmaster GHS Pandi Lalma Khyber Agency

6 EMIS Local Directorate

7 Teacher concerned

DEPUTY DIRECTRESS (ESTAB)

Attested

(11) F

بخدمت جناب ڈائریکٹر ایجوکیشن فاٹا سیکرٹریٹ پشاور

عنوان:۔ اپیل منسوخ تبادلہ

جناب عالی

مودبانہ گذارش ہے۔ کہ بندہ کا اپروول بحوالہ نمبر 6256 بتاریخ 21 جولائی 2014 کو پولیٹیکل ایجنٹ خیبر نے اور بعد میں ایجنسی ایجوکیشن افیسر نے ایڈجسٹمنٹ آرڈر بحوالہ نمبر 6324 بتاریخ 22 جولائی 2014 ایجنسی فزیکل سپروائزر کے خالی پوسٹ پر کر دیا تھا۔ جس پر بندہ عرصہ چھ مہینے سے اپنے خدمات احسن طریقے سے سرانجام دے رہا ہے۔ بندہ کا سکیل اور کوالیفیکیشن اس پوسٹ کے برابر ہے۔ اور بندہ خیبر ایجنسی کا مستقل باشندہ بھی ہے۔

آپ صاحبان نے بندہ کا اپروول 27 جنوری 2015 کو کینسل کر کے نعیم خان APS کو باجوڑ ایجنسی سے خیبر ایجنسی ٹرانسفر کیا۔ کہ نہ تو نعیم خان خیبر ایجنسی کا مستقل باشندہ ہے۔ اور نہ ہی نعیم خان APS نے خیبر ایجنسی سے باجوڑ ایجنسی اپنی مرضی سے ٹرانسفر کی تھی۔ اور اس کی tenure بھی ابھی پورا نہیں ہوا ہے۔

اس لئے آپ صاحبان مہربانی کر کے بندہ کے تبدیلی کو منسوخ کرنے کے احکامات جاری کریں۔ بندہ مشکور و ممنون رہے گا۔

العارض

محمد شاہد ایجنسی فزیکل سپروائزر خیبر ایجنسی

محمد شاہد
05/02/2015

Process pl
DD(AD(S)) 25/2/15

pl file
9/3/2015

Attested
Adv

(12)

G

FATA SECRETARIAT
(ADMINISTRATION, INFRASTRUCTURE & COORDINATION DEPARTMENT)
WARSAK ROAD PESHAWAR

Establishment Section

NOTIFICATION:-

No. FS/E/100-19(Vol-41)/ 1645-51. On creation of Agency Cadre for appointment on posts from BS-1 to BS-15 vide FATA Secretariat Notification No FS/E/100-19(Vol-28)/6981-94 dated 03-08-2009, the competent authority has been pleased to declare the following as "**Appellate Authorities**" for the employees in Basic Pay Scales as noted against each:-

S.No	Basic Pay Scale (1)	Appointing Authority (2)	Appellate Authority (3)
1	For holders of posts in BPS 1 to BPS-10	Agency Officer incharge of the concerned department in Agency/FRs	Director of concerned Line Directorate
2	For holders of posts in BPS 11 to BPS-15	Political Agent concerned	Respective Administrative Secretary of the concerned Line Directorate in FATA Secretariat

SECRETARY (ADMN: INFRA: & COORD

Dated [illegible]/02/2015

Copy to :-

1. All Administrative Secretaries in FATA Secretariat
2. All Heads of Line Directorates in FATA Secretariat
3. All Political Agents / Khyber
4. Deputy Commissioners (for FRs)
5. PS to ACS FATA
6. PS to Secretary AI&C Department
7. File No. FS/E/100-19(Vol-28-Agency Cadre)

(SAIFULLAH KHAN
Section Officer (Esta

Accn: II

Attested

Adv

13

بعدالت [illegible]

[illegible] 2ء منجانب [illegible]

بنام [illegible]

مورخہ ---- 9 [illegible]

مقدمہ ---- [illegible]

دعویٰ ----

جرم ----

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کاروائی متعلقہ آن مقام [illegible] کیلئے [illegible] مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث ہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ ار عرضی دعوی اور درخواست ہر قسم کی تصدیق زرایں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برامدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پرداختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہرجانہ التوائے مقدمہ کے سبب سے وہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھدیا کہ سند رہے۔

المرقوم ---- 9 ---- ماہ [illegible] 20[illegible]

العبد ---- گواہ العبد ----

بمقام [illegible] کے لئے منظور ہے۔

Attested & Accepted

[illegible] Adv

9/4/2015

CNIC 17301-3799392-3

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWASR.

Sevice appeal No. 352/2015

Mohammad Shahid .....Appellant

Versus

Director Education FATA & others.....Respondents

Reply on behalf of respondent No.1 & 2.

Respectfully Sheweth.

Preliminary Objections.

1. That the appeal is not maintainable in its present form.
2. That the appellant has not come to this Tribunal with clean hands.
3. That the appellant has got no cause of action.
4. That the appellant has got no locus standi to file the instant appeal.
5. That the appellant has been estopped by his own conduct to file the appeal
6. That the appeal is badly time barred
7. That the impugned order is according to Law

Objections on Facts:

1. Incorrect the preliminary qualification for recruitment against the post of PET is Junior diploma in Physical Education (JDPE) and not senior diplomat in Physical Education(SDPE).
2. In correct. Respondent No.1 has not recommended Mr Shahid PET's posting against vacant post of Agency Physical Supervisor (APS) but Political Agent Khyber, the competent Authority, in the instant case, allowed Mr Shahid's posting against the vacant post of APS Khyber. As a matter of fact Mr Mohammad Gul APS Bajaur developed understanding with Mr Mohammad Naeem APS Khyber, the former was to be retired, both mutually transferred themselves through the then Director Education FATA, soon after the mutual transfer Mr Mohammad Gul got retired,consequently the post of APS Khyber was vacated and the KPO post was already vacant. Mr Mohd Shahid PET, a computer expert, was the best option for the vacant positions, the physical activities and EMIS of Khyber.
3. The transfer order was issued by AEO Khyber, as a stop gap arrangement, on the permission of Political Agent Khyber, as the later was competent enough for the same vide Notification (annexure G to Appeal) being agency cadre post, whereas the Post of APS though falls in B-15 but the same is the prerogative of Director Education FATA, being provincial cadre post.
4. Incorrect, though the post of Agency Physical Supervisor lies in B-15 but the same is the prerogative of Director Education FATA, being provincial cadre post. Mr Shahid PET was transferred from GHS Paindi Lalma Mulagori Jamrud as the post of Agency Physical supervisor Khyber was vacant due to the retirement of Mr Mohd Gul Agency Physical Supervisor.
5. Correct.
6. Incorrect, the Director Education FATA is competent enough for posting of Mr Mohd Naeem Agency Physical Supervisor, being provincial cadre post. The impugned order is accordance with law. Detail reply of grounds has been given below.

Objections On Grounds:

a) Incorrect. The impugned order is legal valid and according to law and rules being issued by competent authority.

b) Incorrect, the competent authority for the post of Agency Physical Supervisor (APS) B-15 is respondent No.1 whereas for the Post of PET B-15, the competent authority is Political Agent.

c) Incorrect. The impugned order is in public interest and according to section 10 of civil servant Act 1973.

d) Incorrect, he was posted by his competent authority in public interest and its cancellation was also made by the respective competent authority according to section 10 of civil servant Act 1973

e) Incorrect, Agency Physical Supervisor (APS) B-15 is provincial cadre post and not agency cadre one, whereas the Physical Education Teacher (PET) B-15 is agency cadre post.

f) As per paras mentioned above.

g) Transfer is no punishment; it is the prerogative of the competent authority to post an agency cadre civil servant anywhere in agency and the appellant has not been posted out of agency.

h) In correct , as explained in paras mentioned above

i) In correct, Not relinquishing charge is misconduct to which the appellant is resorting

j) No comment. However the respondents also seek permission to advance further grounds during arguments

It is, therefore humbly prayed that on acceptance of the above real grounds .the appeal of the appellant may be dismissed with cost.

Respondent No.1 — Director Education, FATA

Respondent No.2 — Agency Education Officer
Khyber Agency

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWASR.

Sevice appeal No..352/2015

Mohammad Shahid .....Appellant

Versus

Director Education FATA & others.....Respondents

Reply on behalf of respondent No.1 and 2 on status quo

Respectfully Sheweth ;

1. No comments
2. Incorrect
3. Incorrect all the three ingredients are in favor of respondents
4. Incorrect
5. That the facts in grounds of the written reply may kindly be read as integral part of this reply

It is therefore requested on acceptance of this reply the appeal of the appellant may kindly be dismissed with cost

Respondent No.1

Director Education, FATA

Respondent No.2

Agency Education Officer
Khyber Agency

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWASR.

Sevice appeal No. 352/2015

Mohammad Shahid .....Appellant

Versus

Director Education FATA & others.....Respondents

AFFIDAVIT

We, the respondents No.1 &2 do hereby solemnly affirm and declare that the content of the reply are true and correct to the best of our knowledge and belief and noting has been concealed from this Honorable Tribunal

Respondent No.1

Director Education, FATA

Respondent No.2

Agency Education Officer
Khyber Agency

BEFORE THE HONOURABLE KPK SERVICE TRIBUNAL PESHAWAR.

Service Appeal No. 352/2015

Muhammad Shahid Versus Director Education FATA

PARA-WISE COMMENTS ON BEHALF OF RESPONDENT NO. 6.

Respectfully sheweth,

I- PRELIMINARY OBJECTIONS.

i. That the appellant has got no locus standi or cause of action to file the appeal in hand.

ii. That the appeal in hand is not maintainable as the appellant has not preferred any departmental appeal.

iii. That the appeal is bad for mis-joinder and non-joinder of necessary parties.

iv. That the appellant is estopped to file the appeal in hand.

v. That the appellant has not come to this court with clean hands.

vi. That appellant has tried his level best to mislead this honourable tribunal.

vii. That this honourable court has got no jurisdiction to entertain the appeal in hand.

ON FACTS

1- Although the contents of para-1 are pertains to record however, the appellant has himself categorically admitted that basically he is Physical Education Teacher (PET) whereas, the answering respondent is appointed as Agency Physical Supervisor. Both of the posts having different criteria and requirements of both the posts of totally and altogether different from each other.

2- Contents of para-2 are mis-leading. Respondent No.1 i.e. Director Education (FATA) never recommended the name of the appellant

to be posted as Agency Physical Supervisor. Moreover, Respondent No.2 & 3 are not competent to make recommendation or order the posting of appellant as APS as the post of Agency Physical Supervisor has to be appointed through promotion or by initial by the Respondent No.1.

3- As explained in para-2 above, as the Respondent No.2 was not competent to issue the transfer order of the appellant, therefore, the said order was without any lawful authority.

4- Contents of para-4 are wrong. As the transfer order of the appellant was made illegally and without lawful authority, therefore, the competent authority was pleased to cancel the same.

5- Not Correct. The appellant never filed any appeal before the competent authority, therefore, the question of any appeal does not arise.

6- Not Correct, the impugned order of Respondent No.1 is just, legal and issued after proper appreciation of law and rules applicable thereto.

GROUNDS.

A. Contents of Para-A are wrong. The order is just and legal.

B. Not Correct. The respondents No.1 is the sole competent authority to issue the transfer & posting order of the Agency Physical Supervisor.

C. Not Correct. No favoritism or illegality is there. Rather, it is the appellant who used un due influence for his posting as Agency Physical Supervisor.

D. As the posting/transfer of the appellant was made illegally, therefore, the said order was cancelled by the competent authority.

E. Not Correct. The Agency Physical Supervisor is not Agency Cadre post and if so, then the previous transfer order of the answering respondent is also illegal as the answering respondent was previously posted in Khyber Agency and the Respondent No.1 ordered the transfer of the respondent No.6.

F. Not Correct. The Respondent No.6 was transferred by the Respondent No.1 in public interest and proper TA/DA was also paid to the Respondent No.6 which is not payable in case of mutual transfer.

G. Pertains to record.

H. Not correct. Even the appellant have violated the law and rules applicable thereto.

I. Contents of Para are wrong. The appellant had earlier relinquished the charge.

J. The respondent No.6 requests for any other ground at the time of arguments.

It is, therefore, prayed that the appeal may kindly be dismissed with heavy costs.

Respondent No.6

Through:

IBADUR RAHMAN
Advocate High Court
127-Sarhad Mansion
Hashtnagri, GT Road
Peshawar.

Dated. 3 /9/2015.

AFFIDAVIT.

Stated on oath that the above contents are true and correct to the best of my knowledge and belief.

Deponent

(1)

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR.

Service Appeal No:- 352/2015

Muhammad Shahid .... Appellant	**Versus**	Director & others ....Respondents

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REJOINDER ON BEHALF OF APPELLANT.

Respectfully Sheweth:-

Reply to Preliminary objections:

All the preliminary objections raised by the respondents are incorrect, Hence denied. The Appellant has got a valid cause of action. He has come with clean hands to this Honourable Tribunal having locus standi to file the present appeal, is not estopped by his conduct to file a present appeal and the present appeal is maintainable in its present form. Instant appeal is well within time and the impugned order is against the law and rules.

Para Wise Comments:-

All the points raised by the respondents are incorrect and not admitted. The comments of the respondents are full of contradictions, rather

amounts to admission on part of the respondents. The respondents have admitted that the mentioned post is agency cadre post and that competent authority is political agent for the same. The appellant is having the requisite qualification for the post and the private respondent is absent from duty since the impugned order and the malafide of the respondents is proved from the fact that despite status quo order of this tribunal, He is kept at Khyber Agency, which amounts to contempt of court order. The copy of attendance register and documents of the appellant are enclosed as annexure "H" & "I".

Besides the conduct of the respondent No.6, he was posted with his consent and mutual with Muhammad Gul and he remained there only for a few months and on the basis of nepotism and favoritism he was again transferred to Khyber Agency. Respondents have termed the mentioned post as agency cadre and then as provincial cadre post which speaks of any thing but not fair and bonafide. Even notification dated 22/07/2014 was issued with the approval of the political agent concerned, Hence the impugned order is not maintainable being passed without jurisdiction. The post of agency Physical supervisor being agency cadre post and the

appellant is the permanent resident of Khyber Agency, while respondent No.6 belongs to Waziristan Agency, hence too the appellant is entitled to be posted at Khyber Agency.

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

Dated:- 19/10/2015

Appellant

Through:-

Fazal Shah Mohmand
Advocate, Peshawar.

(4)

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR.

Service Appeal No:- 352/2015

Muhammad Shahid .... Appellant **Versus** Director & others ....Respondents

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AFFIDAVIT

*I, **Muhammad Shahid,** Agency Physical Supervisor Khyber Agency, do hereby solemnly affirm and declare on oath that the contents of this **rejoinder** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.*

Identified by

DEPONENT

Fazal Shah Mohmand
Advocate, Peshawar.

Khalid Mehmood Advocate
Attested
Oath Commissioner
Peshawar High Court

(5) H

رجسٹر حاضری مدرسین [illegible]

جولائی ۲۰۱۵ء

مشتاق حسین	محمد شاہد	محمد نعیم خان	الف شاہ
[illegible]	AAPS	AAPS	S/Clerk

نمبر	آمد	دستخط	روانگی	دستخط	آمد	دستخط	روانگی	دستخط	آمد	دستخط	روانگی	دستخط	آمد	دستخط	روانگی	دستخط
1	8.00	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]					8.00	AS	2.00	[illegible]
2	8.30	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]					8.00	AS	2.00	AS
3	9.00	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]					8.00	AS	2.00	AS
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6	8.00	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]					8.00	AS	2.00	AS
7	8.30	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]					8.00	AS	2.00	AS
8	9.00	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]					8.00	AS	2.00	AS
9	8.00	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]					8.00	AS	2.00	AS
10	8.00	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]					8.00	AS	2.00	AS
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13	9.00	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]					8.00	AS	2.00	AS
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15	8.30	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]					8.00	AS	2.00	AS
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22	8.00	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]					8.00	AS	4.00	AS
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27	8.00	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]					8.00	AS	4.00	AS
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قسم رخصت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	حال

Attested

(6)

رجسٹر حاضری مدرسین [illegible]

2015ء

	محمد نعیم			محمد شاہد				مشتاق حسین				عماد خان			
	APS			APS				Asst				Supdt			
دستخط	روانگی	دستخط	آمد	دستخط	روانگی	دستخط	آمد	دستخط	روانگی	دستخط	آمد	دستخط	روانگی	دستخط	آمد
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				Sh	4	Sh	8	[illegible]	4	[illegible]	8	[illegible]	4.00	[illegible]	8.00
				Sh	4	Sh	8	[illegible]	4	[illegible]	8	[illegible]	4.00	[illegible]	8.00
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				Sh	4	Sh	8	[illegible]	4	[illegible]	8	[illegible]	4.00	[illegible]	8.00

Attested

(7)

ستمبر 2015ء

شکیل احمد	الف شاہ	محمد نعیم	
S/Clerk	S/Clerk	APS	APS

دستخط	روانگی	دستخط	آمد	دستخط	روانگی	دستخط	آمد	دستخط	روانگی	دستخط	آمد	دستخط	روانگی	دستخط	آمد	
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			7.45				8.00						4.00		8.00	30
																31

Attested

Serial No. 43252

Registration No. _____

Roll No. _____

Session _____

GOMAL UNIVERSITY

DERA ISMAIL KHAN

N.W.F.P.

PAKISTAN

Provisional Certificate

This is to certify that Mr. / Miss / Mrs. MUHAMMAD SHAHID

Son / Daughter / Wife of MUHAMMAD IQBAL

of the Department / Institute of COLLEGE OF PHYSICAL EDUCATION & RESEARCH (Pvt.) PESHAWAR

has passed S.D.P.E. [illegible] *Examination held in* AUGUST, 2004

in the subject of SENIOR DIPLOMA IN PHYSICAL EDUCATION

He / She was placed in FIRST

division, Securing 679 *marks out of* 1050

The examination was taken as a whole / in parts.

Dera Ismail Khan

Dated 12-10-2004

CONTROLLER OF EXAMINATIONS

26/5/05

AGENCY EDUCATION OFFICE KHYBER
PHONE: 091-5820 FAX: 091-5820
NO 6256 DATED 21-7-2014

(9)

To

The Political Agent,
Khyber Agency.

Subject: **Approval of APS in Khyber**

Memo;

Consequent upon the retirement of Mr Muhammad Gul APS BPS–15 Mr. Muhammad Shahid PET BPS-15 may kindly be approved to be posted as APS in Khyber.
Mr. Muhammad Shahid PET will also run the Computer EMIS Cell, being proficient in MS Office & Coral Draw.

Agency Education Officer,
Khyber Agency at Jamrud

Allowed
21/7

(1)

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR.

Service Appeal No:- **352**/2015

Muhammad Shahid **Versus** Director & others

.... Appellant ....Respondents

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REJOINDER ON BEHALF OF APPELLANT.

Respectfully Sheweth:-

Reply to Preliminary objections:

All the preliminary objections raised by the respondents are incorrect, Hence denied. The Appellant has got a valid cause of action. He has come with clean hands to this Honourable Tribunal having locus standi to file the present appeal, is not estopped by his conduct to file a present appeal and the present appeal is maintainable in its present form. Instant appeal is well within time and the impugned order is against the law and rules.

Para Wise Comments:-

All the points raised by the respondents are incorrect and not admitted. The comments of the respondents are full of contradictions, rather

amounts to admission on part of the respondents. The respondents have admitted that the mentioned post is agency cadre post and that competent authority is political agent for the same. The appellant is having the requisite qualification for the post and the private respondent is absent from duty since the impugned order and the malafide of the respondents is proved from the fact that despite status quo order of this tribunal, He is kept at Khyber Agency, which amounts to contempt of court order. The copy of attendance register and documents of the appellant are enclosed as annexure "H" & "I".

Besides the conduct of the respondent No.6, he was posted with his consent and mutual with Muhammad Gul and he remained there only for a few months and on the basis of nepotism and favoritism he was again transferred to Khyber Agency. Respondents have termed the mentioned post as agency cadre and then as provincial cadre post which speaks of any thing but not fair and bonafide. Even notification dated 22/07/2014 was issued with the approval of the political agent concerned, Hence the impugned order is not maintainable being passed without jurisdiction. The post of agency Physical supervisor being agency cadre post and the

appellant is the permanent resident of Khyber Agency, while respondent No.6 belongs to Waziristan Agency, hence too the appellant is entitled to be posted at Khyber Agency.

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

Dated:- 19/10/2015

Appellant

Through:-

Fazal Shah Mohmand
Advocate, Peshawar.

(4)

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR.

Service Appeal No:- **352**/2015

Muhammad Shahid **Versus** Director & others

.... Appellant ....Respondents

✧✧✧✧✧✧✧✧✧✧✧✧✧✧✧✧✧✧✧✧✧✧✧✧✧✧✧✧✧✧✧✧

AFFIDAVIT

*I, **Muhammad Shahid,** Agency Physical Supervisor Khyber Agency, do hereby solemnly affirm and declare on oath that the contents of this **rejoinder** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.*

Identified by DEPONENT

Fazal Shah Mohmand
Advocate, Peshawar.

Khalid Mehmood Advocate ★ Peshawar High Court
Attested
Oath Commissioner

S2

H

رجسٹر حاضری مدرسین / ایکسی ایکوکیشن آفس خیبر ایجنسی

بابت ماہ جولائی 2015ء

نام	مشتاق حسین	محمد شاہد	محمد نعیم خان	الف شاہ
عہدہ	Asstt	AAPS	AAPS	S/Clerk

تاریخ	آمد	دستخط	روانگی	دستخط	آمد	دستخط	روانگی	دستخط	آمد	دستخط	روانگی	دستخط	آمد	دستخط	روانگی	دستخط
1	8.00	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]					8.00	AS	2/-	[illegible]
2	8.30	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]					8/-	AS	2/-	AS
3	9.00	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]					8/-	AS	2/-	AS
4																
5																
6	8.00	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]					8/-	AS	2/-	AS
7	8.30	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]					8/-	AS	2/-	AS
8	9.00	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]					8/-	AS	2/-	AS
9	8.00	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]					8/-	AS	2/-	AS
10	8.00	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]					8/-	AS	2/-	AS
11																
12																
13	9.00	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]					8/-	AS	2/-	AS
14	8.00	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]					8/-	AS	2/-	AS
15	8.30	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]					8/-	AS	2/-	AS
16	8.00	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]					8/-	AS	2/-	AS
17																
18																
19																
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21																
22	8.00	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]					8.00	AS	4/-	AS
23	8.30	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]					8.00	AS	4/-	AS
24	8.30	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]					8/-	AS	4/-	AS
25																
26																
27	8.00	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]					8/-	AS	4/-	AS
28	8.30	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]					8/-	AS	4/-	AS
29	8.00	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]					8/-	AS	4/-	AS
30	8.00	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]					8/-	AS	4/-	AS
31	8.00	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]					8/-	AS	4/-	AS

قسم رخصت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	حال

Attested

(6)

رجسٹر حاضری مدرسین ایجنسی ایجوکیشن آفس ڈگر ایجنسی

بابت ماہ اگست سنہ 2015ء

نام	شمشاد خان	مشتاق حسین	محمد شاہد	محمد نعیم
عہدہ	Supdt.	Asstt	AAPS	AAPS

تاریخ	آمد	دستخط	روانگی	دستخط	آمد	دستخط	روانگی	دستخط	آمد	دستخط	روانگی	دستخط	آمد	دستخط	روانگی	دستخط
1																
2																
3	8.00		4.00		8.30		4.00		8.00		4.00		8.00		4.00	
4	8.00		4.00		9.00		4.00		8.00		4.00		8.00		4.00	
5	8.00		4.00		8.00		4.00		8.00		4.00		8.00		4.00	
6	8.00		4.00		8.15		4.00		8.00		4.00		8.00		4.00	
7	8.00		4.00		9.30		4.00		8.00		4.00		8.00		4.00	
8																
9																
10	8.00		4.00		9.00		4.00		8.00		4.00		8.00		4.00	
11	8.00		4.00		8.30		4.00		8.00		4.00		8.00		4.00	
12	8.00		4.00		9.00		4.00		8.00		4.00		8.00		4.00	
13	8.00		4.00						8.00		4.00		8.00		4.00	
14																
15																
16																
17	8.00		4.00		9.00		4.00		8.00		4.00		8.00		4.00	
18	8.00		4.00		9.00		4.00		8.00		4.00		8.00		4.00	
19	8.00		4.00		8.30		4.00		8.00		4.00		8.00		4.00	
20	8.00		4.00		8.00		4.00		8.00		4.00		8.00		4.00	
21	8.00		4.00		8.00		4.00		8.00		4.00		8.00		4.00	
22																
23																
24	8.00		4.00		9.00		4.00		8.00		4.00		8.00		4.00	
25	8.00		4.00		8.30		4.00		8.00		4.00		8.00		4.00	
26	8.00		4.00		8.00		4.00		8.00		4.00		8.00		4.00	
27	8.00		4.00		8.00		4.00		8.00		4.00		8.00		4.00	
28	8.00		4.00		8.30		4.00		8.00		4.00		8.00		4.00	
29																
30																
31	8.00		4.00		8.00		4.00		8.00		4.00		8.00		4.00	

Attested

(7)

رجسٹر حاضری مدرسین 9/2015 ایجنسی ایم کے بشیر آفس جہیز ایجنسی پشاور

برائے ماہ: ستمبر 2015ء

	محمد شاہد	محمد نعیم	الفت شاہ	شکیل احمد
عہدہ	APS	APS	S/Clerk	S/Clerk

	آمد	دستخط	روانگی	دستخط	آمد	دستخط	روانگی	دستخط	آمد	دستخط	روانگی	دستخط	آمد	دستخط	روانگی	دستخط
1	8.00	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]						[illegible]	4.00	[illegible]
2	8.00	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]						[illegible]	4.00	[illegible]
3	8.00	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]						[illegible]	4.00	[illegible]
4	8.00	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]						[illegible]	4.00	[illegible]
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6																
7	8.00	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]						[illegible]	4.00	[illegible]
8	8.00	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]						[illegible]	4.00	[illegible]
9	8.00	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]						[illegible]	4.00	[illegible]
10	8.00	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]						[illegible]	4.00	[illegible]
11	7.45	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]						[illegible]	4.00	[illegible]
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13																
14	8.00	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]						[illegible]	4.00	[illegible]
15	8.00	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]						[illegible]	4.00	[illegible]
16	8.00	[illegible]	4.00	[illegible]	8.00	[illegible]	4.00	[illegible]						[illegible]	4.00	[illegible]
17	8.00	[illegible]	4.15	[illegible]	8.00	[illegible]	4.00	[illegible]						[illegible]	4.00	[illegible]
18	7.40	[illegible]	4.00	[illegible]										[illegible]	4.00	[illegible]
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20																
21	7.40	[illegible]	4.00	[illegible]										[illegible]	4.00	[illegible]
22	8.00	[illegible]	4.00	[illegible]										[illegible]	4.00	[illegible]
23	8.00	[illegible]	4.00	[illegible]										[illegible]	4.00	[illegible]
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27																
28	8.00	[illegible]	4.00	[illegible]	8.00									[illegible]	4.00	[illegible]
29	8.00	[illegible]	4.15	[illegible]	8.00									[illegible]	4.00	[illegible]
30	7.45	[illegible]			8.00									[illegible]	4.00	[illegible]
31																

عبدالرحمٰن

Attested

AGENCY EDUCATION OFFICE KHYBER
PHONE. 091-5820765. FAX 091-5820265
NO. 6256 DATED 21/07/2014

(9)

To

The Political Agent,
Khyber Agency.

Subject: **Approval of APS in Khyber**

Memo;

Consequent upon the retirement of Mr Muhammad Gul APS BPS–15 Mr. Muhammad Shahid PET BPS-15 may kindly be approved to be posted as APS in Khyber.
Mr. Muhammad Shahid PET will also run the Computer EMIS Cell, being proficient in MS Office & Coral Draw.

Agency Education Officer,
Khyber Agency at Jamrud

Allowed
21/7

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

No. 1204 /ST Dated 2 / 11 / 2015

To

The Superintendent,
Circle HQRs, Prison, Haripur.

Subject: - Judgement.

I am directed to forward herewith certified copy of Judgement dated 21.10.2015 passed by this Tribunal on subject for strict compliance.

Encl: As above

REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.

(7)

TR 428
08/05/2015

Annex 'C'

PAYROLL SYSTEM
AMENDMENT FORM
SINGLE EMPLOYEE ENTRY

Date
Page No

OFFICE OF THE AGENCY EDUCATION OFFICE KHYBER AGENCY AT JAMRUD

FOR THE MONTH OF 1/5/2015 2015

ODO Code (Cost Center) KH 0013 Description AEO KHYBER

Personnel Number 0041623 2 Employee Name Muhammad Shahid National ID Card Number 17301-3799393-3

Grade (Pay Scale Group) 15 ~~AEO~~ Supervisor Designation may be Corrected Salary Status Start Stop

1409

GENERAL DATA CHANGE		CHANGE IN PAYMENTS / DEDUCTIONS									
Field ID	New Contents	Wage Type	Amount Rupees					Paisa	Adj	Effective Date	Remarks
	pay	0001			1	6	2	0	0		
		5801			1	6	2	0	0	P	Certified that the
	HRA	1000				1	5	6	6		official has not been
		5002				1	5	6	6	P	drawn the amount
	CA	1210				2	8	5	6		for the month April 2015
		5011				2	8	5	6	P	
	MA	1300				1	2	0	0		and AR 12, 13, 14 not
		5012				1	2	0	0	P	drawn in March 2015.
	UAA	1528				1	0	0	0		
		5102				1	0	0	0	P	
	AR10	1948				4	0	8	0		
		5898				4	0	8	0	P	The official pay may
	AR11	1970				1	2	2	4		please be started
		5911				1	2	2	4	P	
	AR12	2118				3	2	4	0		
		5938				6	4	8	0	P	
	AR13	2148				2	4	3	0		
		5311				4	8	6	0	P	
	AR14	2174				1	6	2	0		
		5950				3	2	4	0	P	

Asstt. Agency Education Officer Khyber Agency at Jamrud

Adj 4/3/2015

5938 AR 2012 3240/-
5311 AR 2013 2430/-
5950 AR 2014 1620/-

Prepared By

Audited/Checked By
Agency Accounts Officer
Khyber Agency at Jamrud
12/5/15

Entered / Verified By
AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD

FATA SECRETARIAT
DIRECTORATE OF EDUCATION
WARSAK ROAD PESHAWAR, PAKISTAN

No. 11113 DATED 9/10/14
A-12/RACEM KHAN APS BAJOUR

To

The Agency Education Officer
Khyber Agency at Jamrud

Subject: CANCELLATION/WITHDRAWAL OF TRANSFER/ADJUSTMENT ORDER

I am directed to refer to this Directorate letter No. 9864 dated 5/09/2014 and subsequent reminder No. 10787 dated 30/09/2014 on the subject cited above and to state to withdraw the order of Mohammad Shahid PET issued as APS vide Notification Endst: No. 6325-34 dated 22/07/2014 and relieve the PET forthwith to his parent school as this is not the Agency cadre post.

Moreover, the seniority of APS is at provincial level (BPS-15) and has never been Agency Cadre post and the qualification for APS is BA/BSc with Sr. Diploma whereas qualification for PET is FA/FSc with JDC and cannot be posted against APS post.

JDPE

ADDL: DIRECTOR (ESTAB)

Endst: No. _____/

Copy of the above is forwarded to the Agency Accounts Officer Khyber Agency with the remarks to stop the pay of Muhammad Shahid PET working as APS Khyber Agency till further order.

ASSTT: DIRECTOR (ESTAB)

APPENDIX

Sr.#	Nomenclature of post	Minimum Qualifications for Appointment by initial recruitment or by transfer.	Minimum for appointment by Promotion	Age limit	Method of recruitment
1	2	3	4	5	6
1	Principal Government College of Physical Education	.....	.....		By Promotion on the basis of seniority-cum-fitness from amongst the Assistant Directors Physical Education and Senior Lecturers of Physical Education Government colleges having seven years service in the respective sections
2	Assistant Director Physical Education and Sports/Lecturers Govt. College of Physical Education	M Sc in Physical Education from a recognised University		Male 21-30Years Female 21-40Years	a) Eighty five percent by Promotion on the basis of seniority-cum-fitness, from amongst Directors Physical Education Government Higher Secondary Schools/Elementary Colleges and Assistant Distt.Education Officer(Physical) having five years service as such and b).Fifteen percent by initial recruitment.
3	Director Physical Education Govt.Higher secondry schools/ Elementary colleges and Assistant Distt:Education Officer(Physical).	B.A /B.Sc from a recognised university with senior Diploma in Physical Education from a recognised college	.....	Male 21-30Years Female 21-40Years	a).Sixty percent by Promotion, on the basis of seniority-cum-fitness,from amongst the Physical Supervisors with two years service as such and b).Forty percent by initial recruitment.
4	Physical Supervisor.	B.A /B.Sc from a recognised university with senior Diploma in Physical Education.	.....	Male 18-30Years Female 18-40Years	a).Fifty percent by promotion,on the basis of seniority-cum-fitness from amongst the Physical Education Teachers with senior Diploma in Physical Education and having five years service as such and b).Fifty percent by initial recruitment.
5.	Physical Education Teachers.	F.A/F.Sc with junior Diploma in Physical Education/Certificate of training in phy:Education from TAKYA..... TRAINING CENTRE.	.....	Male 21-30Years Female 21-40Years	By initial recruitment.

ATTESTED

Deputy Director
Schools & Literacy
N.W.F.P. Peshawar.

No BO/NIS will be accepted in which Employee Related Expenses have been claimed but not duly supported with details of posts in this proforma

(2)

FEDERAL GOVERNMENT EMPLOYEES BY B.P.S.
2009-2010 (Budget Estimates)

Fund Code : C21F15 Fund Description : FATA

Demand No : 116

Fund Center Code : PR0214 Fund Center Description : Education Inspection
(DDO Code)

Post Code	S.No	BPS	Designation	Number of Posts		
				Total	Filled in	Vacant
	1	19	Agency Education Officer	7	7	0
	2	16	Asst. Agency Education Officer	25	24	1
	3	15	Physical Supervisor	7	7	0
	4	14	Assistant	8	8	0
	5	9	Senior Clerk	17	17	0
	6	7	Junior Clerk	19	17	2
	7	2	Naib Qasid	27	27	0
			Total :	110	107	3

Note : Please ensure that the total number of posts reflected in this proforma are the same as in BO/NIS form.

Abida Azeem
Section Officer (FATA-II)

No BO/NIS will be accepted in which Employee Related Expenses have been claimed but not duly supported with details of posts in this proforma

FEDERAL GOVERNMENT EMPLOYEES BY B.P.S.
2011-2012 (Budget Estimates)

Fund Code : C21F15 Fund Description : FATA

Demand No : 115

Fund Center Code : PR0220 Fund Center Description : Secondary Education
(DDO Code)

Post Code	S.No.	BPS	Designation	Number of Posts Total	Filled in	Vacant
	1	19	Principal	11	11	0
	2	17	Head Master	192	170	22
	3	17	Subject Specialist	148	135	13
	4	16	Agriculture Tutor	4	4	0
	5	16	Librarian	14	10	4
	6	16	SET	820	663	157
	7	14	Assistant	13	11	2
	8	14	AT	744	654	90
	9	9	AWI	60	60	0
	10	9	CT	1147	951	196
	11	9	DM	459	379	80
	12	9	PET	446	362	84
	13	9	Senior Clerk	30	30	0
	14	9	SV	104	101	3
	15	7	JET	3	3	0
	16	7	Junior Clerk	170	158	12
	17	7	Lab Assistant	255	226	29
	18	7	PTC	2	2	0
	19	7	Qari	219	197	22
	20	7	TT	32	32	0
	21	7	Warden	3	3	0
	22	5	Library Clerk	1	1	0
	23	2	Bearer	13	13	0
	24	2	Behishti	154	153	1
	25	2	Caller	8	8	0
	26	2	Chowkidar	68	67	1
	27	2	Class-IV	73	73	0
	28	2	Cook	16	16	0
	29	2	Lab Attendant	258	245	13
	30	2	Mali	140	128	12
	31	2	Naib Qasid	473	398	75
	32	2	Sweeper	594	515	79
	33	2	Tandori	3	3	0
	34	2	Workshop Attendant	21	21	0

(4)

FINAL SENIORITY LIST OF AGENCY PHYSICAL SUPERVIOR/DPE IN B-15 CORRECTED UP TO DATE.

No.	Name & Father's Name/Qualification	D/O Birth Domicale	Place of Posting	D/O Ist entry into Govt. Serv.	year Passing SDPE	D/O 1st Appoint	D/O Taking O/Chg. As Phy: Super.	D/O Promotion	D/O Retirement
1.	Mohd: Tahir, Distt: Phy: Sup: NWA Bannu	20.5.55 Bannu	NWA Bannu	-	-	28.12.76	22.11.81	-	-
2.	Jehanzeb Khan, Distt: Phy: Sup: Orakzai	1.4.48 Peshawar	Orakzai Agency	-	-	5-9-70	4-4-82	-	-
3.	Qutab Din, Distt: Phy: Sup: FR D.I.Khan	15.4.47 FR D.I.Khan	FR. D.I.Khan	-	-	14.6.66	16.8.82	-	-
4.	Waheedullah, Distt: Phy: Sup: Mohand Agency	30.4.54 Peshawar	Mohmand Agency	-	-	26.10.82	26.10.82	-	-
5.	Sanaullah Khan, Distt: Phy:Sup:Bajour Agency.	25.5.52 Bannu	Bajour Agency	-	-	2.2.80	17.4.83	-	-
6.	Bahadur Sher, Distt;Phy:Sup: Orakzai	19.11.56 Bannu	Orakzai Agency	-	-	14.12.80	13.9.83	-	-
7.	Asmatullah,M.Sc:PE/Sup: Orakzai	11.9.52 FR Bannu	Orakzai Agency	13.10.71	5/82	9.2.84	9.2.84	22.5.87	10.9.2012
8.	Akbar Ali,M.Sc:Phy:Sup: Kurram	8.10.52	Kurram Agency	20.10.73	-	18.12.84	18.12.84	-	-
9.	Abdus Sattar,M.Sc:Phy:Sup: Bajour Agency	24.12.45 Lakki	Bajour Agency	23.6.68	79-80	22.12.84	22.12.84	20.10.90	23.12.2005
10.	Ahmad Jan,DPE Bajour Agency	1.1.48	Bajour Agency	7.4.66	-	24.12.84	24.12.84	-	-
11.	Noorul Amin, BA.SDPE S/O Ajab Khan	4.12.48 S.W.A	S.W Agency	-	7.5.84	25.2.77	7.5.85 as PTC	-	4.12.2016
12.	Mohammad Faisal,BA/SDPE/ Phy:Edu: Khyber Agency	-	Khyber Agency	29.6.86	-	1.7.86	1.7.86	-	-
13.	Hazrat Ali S/O Gul Nawaz, BA/SDPE/Phy:Edu:	4.8.60 FR Bannu	Mohmand Agency	-	1985	2.6.81	1.7.86	-	3.8.2020
14.	Rashidullah S/O Kabal Khan. BA/SDPE	7.7.63 FR Bannu	Bajour Agency	-	1986	14.5.84	7.9.87	-	6.7.2023
15.	Abdul Majeed S/O Asal Baz, M.Sc:SDPE	1.10.54 FR Kohat	Orakzai	-	1986	17.11.75 as PTC	13.9.87	-	30.9.2014
16.	Shamsul Aslam S/O Aminullah Khan,M.Sc:/HPE	24.4.60 FR Bannu	Kurram Agency	-	1986	5.10.80	1.3.88	-	24.4.2020
17.	Muhammad Ismail S/O Amir Salam Khan, BA/SDPE/Phy:Sup:	21.6.58 FR Bannu	Mohmand Agency	-	-	10.12.79	29.11.90	29.11.90	-
18.	Rasool Marjan S/O Gul Ajam Khan. BA/SDPE/Phy:Sup:	15.3.64 Kurram Ag.	Kurram Agency	-	-	4.12.87	29.11.90	29.11.90	-

Phy: Sup

25/9/2

D.No 9
25/9

19.	Lal Hussain S/O Muhammad Jan,BA/SDPE/Phy:Sup:	12.3.45 Kurram Agy.	Kurram Agency	-	-	18.11.70	1.12.90
20.	Mukhtiar Ahmad S/O Abdul Mateen,BA/SDPE/Phy:Edu:	10.12.50 Charsadda	Mohmand Agency	-	-	14.10.71	1.12.90
21.	Khaki Rahman S/O Gulzada, M.Sc:(H&PE)Phy:Sup:	1.1.51 N.W.A	Khyber Agency	-	-	2.11.72	21.2.91
22.	Muhammad Gul S/O Muhammad Zabi, BA/SDPE/Phy:Sup:	11.4.67 Bajour Agy.	Bajour Agency	-	-	1.10.95	1.1.96
23.	Nikhatullah, DPE-GEC(M) Kotka Habibullah FR Bannu	1.2.67 FR Bannu	Orakzai Agency	26.5.87	91-92	3.1.96	3.1.96
24.	Naeem Khan S/O Hakim Khan, M.Sc:/SDPE/Phy:Sup:	3.1.69 S.W.A	Khyber Agency	-	-	12.9.95	12.4.20(
25.	Syed Muhammad Khalid S/O Iqbal Shah, M.C:/SDPE/DPE	1.6.70 S.W.A	-	-	-	9.10.95	12.4.20(
26.	Noor Sher AfridiS/O Mughal Khan, BA/SDPE/DPE	15.3.75 FR Kohat	-	-	-	9.10.95	12.4.20(

OFFICE OF THE DIRECTOR OF EDUCATION (FATA) NWFP, PESHAWAR.

Endst: No: 3430-90/AD (P&D) S.List/Phy:Edu./DPEs dated Peshawar the 13/09/2002.

Copy of the above is forwarded to the:-

1. Director of Secondary Education NWFP, Peshawar.
2. Director, Bureau of Curriculum Development & Extension Service NWFP, Abbotabad.
3. Director Primary Education NWFP, Peshawar.
4. All Executives Education Officers (male) in NWFP.
5. All Agency Education Officers in NWFP.
6. Officers Concerned.

Khyber

DIRECTORATE OF EDUCATION (FATA) N.W.F.P., PESHAWAR

(6)

APPOINTMENT/ADJUSTMENT

Consequent upon their selection by the Departmental Selection Committee, the following SDPE/PETs are temporarily appointed/adjusted as Agency Physical Supervisors in BPS-15, Rs.2190-177-4845 plus usual allowances as admissible under the Rules, or on their own pay and scale which ever is beneficial to them, with effect from the dates of their taking over charge against vacant Agency Physical Supervisor/DPE post mentioned against their names: -

S#	NAME/ADDRESS	POSTED AT	REMARKS
1.	Mr.Noor Sher Khan S/O Mughal Khan PET GHS,Bosti Khel FR Kohat.	Agency Physical Supervisor Orakzai Agency.	Against Vacant Agency Physical Supervisor post.
2.	Mr.Naeem Khan S/O Hakeem Khan PET GHS,Shaki South Waz:Agency.	Agency Physical Supervisor Khyber Agency at Jamrud.	-do-
3.	Mr.Syed Muhammad Khalid S/O Syed Muhammad Iqbal Shah PET GMS,Mandana S.W.Agency.	DPE, Govt:Elementary College (M)Jamrud Khyber Ageney.	Vacant Post.

NOTE:-

1. Charge report should be submitted in duplicate to all concerned.
2. TA/DA etc: is not allowed.
3. Their appointment/adjustment against Physical Supervisor is made purely on temporarily basis and is liable to be reverted at any time without notice.
4. Their original Education/Professional Qualification certificates should be checked before they are handed over charge the post.

(Prof:Dr.Sher Alam Khan)
Director of Education
(FATA) NWFP,Peshawar.

Endst:No. 10226-32

Dated 12-/4/2001

Copy of the above is forwarded for information to the:-

1. Director of Education (Secondary) N.W.F.P.,Peshawar.
2. Agency Education Officer concerned.
3. Agency Accounts Officer concerned.
4. Head Master GHS,Basti Khel FR Kohat.
5. Head Master GHS,Shaki (South Waziristan Agency)
6. Head Master GMS,Mandana (South Waziristan Agency)
7. Relevant Files.

Attested

Asstt: Agency Education Officer
Khyber at Jamrud

Director of Education
FATA, N.W.F.P., Peshawar

GOVERNMENT OF PAKISTAN
ACCOUNTANT GENERAL KHYBER PAKHTUNKHWA
DISTRICT khyber
PAY ROLL SYSTEM

(7)

PAYMENT ADVICE

P Sec:001 Month:April 2015
KH0013 -AGENCY EDUCATION OFFICE

Pers #: 00415036 Buckle:
Name: NAEEM KHAN
Dsg.: SUPERVISOR
CNIC No.1110177713138

Min: Min. Of K.A & N A & S.F.R
NTN:
OPF #:
Old #:

GPF Interest Applied
BPS 15 Active Temporary

DEPTT CODE KH0013

PAYS AND ALLOWANCES:	
2174-Adhoc Relief Allow-2014	2,460.00
5002-Adjustment House Rent	1,566.00
5011-Adj Conveyance Allowance	2,856.00
5012-Adjustment Medical All	1,200.00
5102-Adj Unattractive Area All	1,000.00
5311-Adj.Adhoc Relief Allownce	3,690.00
5898-Adj. Adhoc Allowance 50%	6,600.00
5911-Adj. Adhoc Relief 2011	1,980.00
5938-Adj.Adhoc Relief All 2012	4,920.00
Gross Pay and Allowances	101,744.00
DEDUCTIONS:	
IT Payable 2,010.00 Deducted [illegible]	
GPF Balance 82,[illegible].00 Subscr	
6155-Adj Addl.G Insurance Fund	115.00
6156-Adj. E.E.F (Exchange)	13.00
Total Deductions	5,907.00
NET AMOUNT PAYABLE	95,837.00

QUALIFYING SERVICE YRS MON 20 Years 07 Months 020 Days	D.O.B 03.01.1969	LFP Quota: Payment through DDO.

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION PESHAWAR

No. 115 /CE/HSSC/EXAM/15 Dated: 6- 05 -2015

(8)

Name: MUHAMMD SHAHID , PET

Address: GHS PAINDI LALMA JAMRUD KHYBER AGENCY

Phone: 9216262, 9216264.
Fax No: 9222037. 9218092..

Duplicate

Subject: - **EXAMINATION DUTY FOR HSSC (ANNUAL) EXAMINATION COMMENCING ON APRIL 29, 2015**

Memo:

I am to inform that you have been appointed as **INVIGILATOR** in the HSSC (Annual) Examination 2015 commencing on April 29, 2015 at **Center No: 214 Centre Name: GOVT. HIGHER SECONDARY SCHOOL SUFAID SUNG PESHAWAR** You have been assigned this duty on the basis of draw held on April 15, 2015 in the Committee Room of Board of Intermediate and Secondary Education Peshawar Khyber Pakhtunkhwa.

You are directed to reach the Examination Centre **ONE DAY** before the commencement of Examination for making necessary arrangements.

Please note that:-

1. In case of refusal, the concerned competent authority shall initiate disciplinary action against the teachers, under the Khyber Pakhtunkhwa Government Servants (E&D) Rules, 2011.
2. Regrets/refusal shall be entertained only in case where the near relative is appearing in the above mentioned examination. However, relationship in such cases must be supported by documentary proof.
3. "Near relative" includes wife, husband, son, daughter, brother and sister as per rules of the Board.

MOST IMPORTANT

The use of mobile phone is strictly prohibited for supervisory staff in the examination hall. In case of violation, the superintendent concerned of the examination hall will be liable for disqualification.

Note: Contingent / TA.DA bill must be submitted in the Board Office within Ten days after end of the examination.

You are further requested to provide bank account number, along with name of the bank, for paying your remuneration online.

(Hamidullah Jan Marwat)
Controller of Examinations
Board of Intermediate & Secondary
Education, Peshawar.

Unite And Help Us In Fighting Against Cheating In Examinations

---

NOTE:- PLEASE SUBMIT THIS ACKNOWLEDGEMENT TO THE CONCERNED CENTER SUPERINTENDENT ON FIRST DAY OF THE EXAM.

From

Name: MUHAMMD SHAHID , PET (Invigilator)

Address: GHS PAINDI LALMA JAMRUD KHYBER AGENCY

Name of Centre:GOVT. HIGHER SECONDARY SCHOOL SUFAID SUNG PESHAWAR

Duplicate

To

Superintendent.
Centre No: '214'

CNIC No: _____

Mobile No: _____

Subject: - **ACKNOWLEDGEMENT/ACCEPTANCE**

Bank Name: _____

Memo:

Branch Code & Account No: _____

Confirmed.

Signature & Date: _____

All Teachers Association
Khyber Agency

آل ٹیچرز ایسوسی ایشن
خیبر ایجنسی

Atiq Ur Rehman
0333-9369630
General Secretary

Naseer Shah Afridi
0333-9166591
President

Sher Rehman
0302-5955254
Senior vice President

Khurshid Khan
0346-9104460
Vice President

Miss Saima Hanif
2nd Vice President

Marwat Khan
0347-5252254
Deputy General Secretary

Hanif Khan
0333-9117163
Finance Secretary

Sarwar Khan
0333-9179241
Information Secretary

Muhammad Sadeeq
0301-8977575
Joint Secretary

Muhammad Shahid
0300-8342255
Office Secretary

Sahar Gul
0333-9304884
Press Secretary

Muhammad Karim
0333-9559421
Deputy Joint Secretary

Mulana Millat Khan
0314-9007992
Chairman
Ullama Council

www.facebook.com/allteachersassociationkhyberagency

Annex: B (6)

PAYROLL SYSTEM
AMENDMENT FORM
SINGLE EMPLOYEE ENTRY

FORM: PAY02

Date 1

Page No. 2

OFFICE OF THE 3 AEO

FOR THE MONTH OF 4 / 15

DDO Code 5 (Cost Center) KH0013 Description 6

Personnel Number 7 00415036 Employee Name 8 Naeem Khan National ID 9 Card Number

Grade (Pay Scale Group) 10 15 11 APS

Salary 12 Status ☐ Start ☐ Stop

GENERAL DATA CHANGE 13			CHANGE IN PAYMENTS / DEDUCTIONS 17					
Info 14 Type	Field ID 15	New Contents 16	Wage Type 18	Amount Rupees 19	Paisa	Adj 20	Effective Date 21	Remarks 22
		Pay Stop						
		till further						
		order Please						
		vide DC FATA NO.						
		5739 dated 15/05/2015						

Prepared By 23

Asstt. Agency Education Officer
Khyber at Jamrud

25 Entered / Verified By.

AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD