

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

Service Appeal No: 1380/2022

Akmal Hussain, SST BPS-16 District Orakzai.....Appellant

VERSUS

Khyber Pakhtunkhwa  
Service Tribunal  
6386  
Diary No. 11/7/23

Government of, Khyber Pakhtunkhwa through the Secretary E&SE Department &  
others.....Respondents

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*T. Q. Q.*  
Assistant Director (Lit: II)  
E&SE Khyber Pakhtunkhwa,  
Peshawar

①

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

**Service Appeal No: 1380/2022**

Akmal Hussain, SST BPS-16 District Orakzai.....Appellant

VERSUS

Government of, Khyber Pakhtunkhwa through the Secretary E&SE Department &  
others.....Respondents

**JOINT PARAWISE COMMENTS ON BEHALF OF RESPONDENTS No: 1-4.**

Respectfully Sheweth,

**PRELIMINARY OBJECTIONS.**

- 1 That the Appellant has got no cause of action/locus standi to file instant appeal.
- 2 That the appellant has concealed material facts from this Honorable Tribunal.
- 3 That the appellant has not come to this Honorable Tribunal with clean hands.
- 4 That the appeal in hand is based on mala fide intentions for illegal service benefits.
- 5 That the appeal in hand is barred by law and limitation.
- 6 That the appeal in hand is bad for mis-joinder and non-joinder of the necessary parties.
- 7 That the impugned order dated 28-<sup>02</sup>~~02~~-2018 is legal.
- 8 That the appellant was an employee of EX FATA till 2017 under the authority of the Federal Government & has been merged in Khyber Pakhtunkhwa through the 18<sup>th</sup> amendment in the constitution of 1973.

**ON FACTS.**

- 1 That Para-1 pertains to the academic record of the appellant.
- 2 That Para-2 pertains to the appointment against the CT (M) post of the appellant vide order dated 06-12-1989 & his further promotion as SST with his adjustment at GHS Avi Mela Orakzai District Hangu is subject to the proper proof & record on the part of the appellant.
- 3 That Para-3 is correct to the extent of Notification bearing No. SO(PE)/4-5/SSRC/Meeting/2013/TC dated 24-07-2014, whereby, the criteria for promotion in the upper scales for the Teaching Cadre working in the Khyber Pakhtunkhwa was framed & Notified excluding the Teaching Staff of Ex-FATA/NMDs which was directly falls within the administrative authority of

the Federal Government & was merged into Khyber Pakhtunkhwa through the 18<sup>th</sup> amendment in the constitution of 1973 passed by the National Assembly & approved by the president of Pakistan, therefore, the appellant does not fall within the ambit of aforesaid promotion service rules dated 24-07-2014 as the cases have been proceeded by the Director Ex-FATA in the year 2017 after the approval of the Federal Government as evident from the letter No. 12492 dated 30-08-2021 of the Deputy Director FATA. *(Copies of the Notification dated 24-07-2014 & letter dated 30-08-2021 are Annex-A & B).*

- 4 That Para-4 is correct to the extent of the letters dated 07-08-2014 of the then Deputy Director Khyber Pakhtunkhwa whereby, all the DEOs (M/F) throughout Khyber Pakhtunkhwa excluding the Ex-FATA have been directed to process the cases of Teaching Cadre in view of the service rules as cited above. *(Copy of the letter is Annexure-C).*
- 5 That Para-5 is incorrect as the Respondent No.2 is mainly responsible for processing the Promotion & upgradation cases of Teachers working in the Khyber Pakhtunkhwa (Settled Areas) during the period w.e.f. 2014 to 2017 & not for Ex-FATA/NMDs Directorate has still a separate administrative setup for the said purpose.
- 6 That Para-6 is incorrect as the DEO (M) Hangu is not competent to grant promotion against the SST in BPS-16 post in the Department rather he may adjust an already promoted SST by the Respondent No. 3 in his District.
- 7 That Para-7 is correct to the extent of letter dated 09-03-2015 which was applicable upon the employees of Khyber Pakhtunkhwa & not on FATA till 2017.
- 8 That Para-8 is also incorrect as the act of the Respondents No. 3 & 5 with regard to the Notification dated 24-07-2014 & 11-10-2017 are within legal sphere.
- 9 That Para-9 is incorrect as the act of the Respondent No.3 with regard to the Seniority & promotion of the appellant & all other Teachers working Ex-FATA/NMDs is within legal parameter with further submission that the service rules dated 13-11-2012 has been done away with the service rules dated 24-07-2014 by the Department.
- 10 That Para-10 is correct that vide order dated 14-02-2017, the Government of Khyber Pakhtunkhwa is upgraded teaching cadre post where under, the appellant was also upgraded vide Notification dated 14-02-2017 w.e.f 20-02-2013 by the Department.
- 11 That Para-11 is also incorrect as the service rules dated 24-07-2014 was not extended to the Ex-FATA/NMDs during the period of 2014 to 2017, whereby, the appellant was promoted to the post of SST in BPS-16 vide order dated 28-02-2018 by the Department attached as *Annexure-D*.
- 12 That Para-12 is incorrect, as no Departmental appeal has been filed by the appellant against the service rules dated 24-7-2014 & Notification dated 28-2-2018, hence, got final under the law of limitation.
- 13 That Para-13 is incorrect as replied to this Para has been given above.
- 14 That Para-14 is subject to the proof & record on the part of the appellant.

15 That Para-15 is correct to the extent of the judgment dated 14-07-2021 of this Honorable Tribunal rendered in Service Appeal No. 1266/2018 Afzal Shah SST VS Govt; which is not applicable upon the case of the appellant.


16 That para-16 is incorrect as the appellant has got no cause of action to approached this Honorable Tribunal in the titled appeal against the Respondents.


17 That Para-17 is also incorrect, hence, denied, therefore, the case in hand is liable to dismissed on the following grounds inter alia: -

**ON GROUNDS.**

- I. Incorrect & not admitted, the appellant has been treated as per law & rules.
- II. Incorrect & not admitted. As reply to this ground has been given above.
- III. Incorrect & not admitted. As reply to this ground has been given above.
- IV. Incorrect & not admitted. The act of the Department is legal with no discrimination to words the appellant in the titled case.
- V. Incorrect & not admitted. The Notification dated 24-07-2014 is not applicable upon the case of the appellant.
- VI. Incorrect & not admitted. As reply to this ground has been given above.
- VII. Incorrect & not admitted. Hence, needs no further comments.
- VIII. Incorrect & not admitted. The stand of the appellant is illegal as is not entitled for promotion as SST w.e.f. 24-07-2014 under the rules.
- IX. Incorrect & not admitted. However, the Respondents also seek leave to this Learned Bench to submit additional grounds record & case law at the time on date of hearing.

Therefore, in view of the above made submissions, the appeal in hand may kindly be rejected in favor of the Department in the interest of justice.


  
**SECRETARY**  
 E&SE Department Khyber  
 Pakhtunkhwa, Peshawar.  
 (Respondent No: 1)

  
**DIRECTOR**  
 E&SE Department Khyber  
 Pakhtunkhwa, Peshawar.  
 (Respondents No: 2-4)

**AFFIDAVIT**

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

**TESTED**

  
 Notary Public  
 Azmat Ali Akbar  
 Judicial Complex Peshawar  
 Deponent  
 07-2023



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Peshawar, dated the 24<sup>th</sup> July, 2014.

**NOTIFICATION**

**No.SO(PE)4-5/SSRC/Meeting/2013/Teaching-Cadre:-** In pursuance of the provisions contained in sub rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department hereby directs that in this Department's Notifications No.SO(G)S&LD/1-28/2003/Vol-II dated, 09-04-2004, Notification No.SO(G)S&L/1-69/06/Vol-1/DPE/LIB dated, 13-11-2007, and Notification No.SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre, dated, 13.11.2012, the following further amendments shall be made, namely:

**AMENDMENTS**

In the Appendix,-

- (i) Serial No. 1 shall be renumbered as 1B and before Serial No. 1B, as so renumbered, the following new entries shall be inserted in respective columns, namely:

1	2	3	4	5
1	Subject Specialist (BPS-17)	<p>i. At least second class Master's Degree or four years BS Degree in the relevant subject; and</p> <p>ii. Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A Education or equivalent qualification from a recognized University.</p>	23 to 35 years	<p>(a) Fifty per cent by promotion, on the basis of seniority-cum-fitness, for the relevant subject from amongst the Secondary School Teachers (BPS-16), with at least five years service as such and having qualification mentioned in column No. 3.</p> <p>Note: If no suitable candidate is available in the relevant subject the post falling in their promotion quota shall be filled by initial</p>

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1A	Director Physical Education (BPS-17)	At least second class Master's Degree in Physical Education from a recognized University.	22-35 years	recruitment; and (b) fifty percent by initial recruitment.
				(a) Fifty percent by promotion, on the basis of seniority-cum-fitness, from amongst Senior Physical Education Teachers (BPS-16), with at least five years service as Senior Physical Education Teacher and Physical Education Teacher and having qualification mentioned in column No. 3:  Provided that if no suitable person is available from amongst Senior Physical Education Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst the Physical Education Teachers, with at least five years service as such and having qualification mentioned in column No. 3;  Note:- If no suitable candidate is available in the relevant cadres of the above teachers, the post falling in their promotion quota shall be filled by initial recruitment; and  (b) fifty percent by initial recruitment"; and

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(ii) against Serial No. 1B, as so renumbered, for the existing entries, the following shall be substituted, in respective columns, namely:

1	2	3	4	5
1B	Secondary School Teacher (BPS-16)	<p>I. At least second class Bachelor Degree's from a recognized University on need basis from the following groups with two subject</p> <p>(a) (Chemistry, Botany or Zoology), Or (b) (Physics, Maths "A" or "B" or Statistics) Or c.s</p> <p>(c) (Humanities and other equivalent groups at degree level with English as compulsory subject;</p> <p>and</p> <p>II. Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A equivalent qualifications from a recognized University.</p>	21 to 35 years.	<p>1. Seventy Five per cent by promotion, on the basis of seniority-cum-fitness, from the district concerned in the following manner:</p> <p>(a) forty per cent from amongst the Senior Certified Teachers (BPS-16), with at least five years service as Senior Certified Teacher and Certified Teacher and having qualification mentioned in column No.3:</p> <p>Provided that if no suitable candidate is available from amongst Senior Certified Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers, with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(b) four per cent from amongst the Senior Drawing Masters (BPS-16), with at least five years service as Senior Drawing Masters and Drawing Masters and having qualification mentioned in column No.3:</p>

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Provided that if no suitable candidate is available from amongst Senior Drawing Masters for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Drawing Masters with at least five years service as such and having qualification mentioned in column No. 3;

- (c) four per cent from amongst the Senior Arabic Teachers(BPS-16), with at least five years service as Senior Arabic Teachers and Arabic Teachers, and having qualification mentioned in column No.3:

Provided that if no suitable candidate is available from amongst Senior Arabic Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from Arabic Teachers with at least five years service as such and having qualification mentioned in column No. 3;

- (d) four per cent from amongst the Senior Theology Teachers(BPS-16), with at least five years service as Senior Theology Teachers and Theology Teachers and having qualification mentioned in column No.3:

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				<p>Provided that if no suitable candidate is available from amongst Senior Theology Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Theology Teachers with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(e) three per cent from amongst the Senior Qaris (BPS-16), with at least five years service as Senior Qari and Qari and having qualification mentioned in column No.3;</p> <p>Provided that if no suitable candidate is available from amongst the Senior Qaris then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from Qaris with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(f) twenty per cent from amongst the Primary School Head Teachers (BPS-16), with at least seven years service as Primary School Head Teachers and Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No. 3;</p> <p>Provided that if no suitable candidate is available from amongst</p>
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				<p>Primary School Head Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least seven years service as Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No.3:</p> <p>Provided further that if no suitable candidate is available from amongst Senior Primary School Teachers for promotion then the post shall be filled from amongst Primary School Teachers with at least seven years service as such and having qualification mentioned in column No. 3; and</p> <p>(ii) twenty Five percent by initial recruitment.</p> <p><b>Note:</b></p> <p>I. If no suitable candidate is available in the relevant cadre of the above teachers, the post falling in their promotion quota shall be filled by initial recruitment.</p> <p>II. Posts of General SST and SSTs-1 Science and SST-2 Science shall be filled by promotion or initial recruitment, each on need basis separately."</p>
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**SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**

**Endst : of even No & date:**

1. The Secretary to Government of Khyber Pakhtunkhwa, Establishment and Administration Department Peshawar.
2. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department Peshawar.
3. The Secretary to Government of Khyber Pakhtunkhwa, Law Department Peshawar
4. The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.
5. The Accountant General Khyber Pakhtunkhwa Peshawar.
6. The Director, Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
7. The Director of Education (FATA) Peshawar.
8. The Director, Curriculum and Teacher Education Khyber Pakhtunkhwa Abbottabad.
9. The Director, (PITE) Khyber Pakhtunkhwa Peshawar.
10. The Director, ESRU Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
11. Manager Government Printing Press Khyber Pakhtunkhwa Peshawar.
12. The Deputy Director, EMIS (S&SE) Department Khyber Pakhtunkhwa Peshawar.
13. All District Education Officer (M&F) in Khyber Pakhtunkhwa.
14. All District Account Officer in Khyber Pakhtunkhwa.
15. All Agency Education Officer in FATA
16. All Agency Account Officer in FATA.
17. PS to Governor Khyber Pakhtunkhwa, Peshawar.
18. PS to Chief Minister Khyber Pakhtunkhwa. Peshawar.
19. PS to Chief Secretary Khyber Pakhtunkhwa. Peshawar.
20. PS to Minister E&SE Khyber Pakhtunkhwa. Peshawar.
21. PS to Secretary E&SE Khyber Pakhtunkhwa. Peshawar.
22. Master file

Attested  
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(ZAMIN KHAN MOMAND)  
SECTION OFFICER (PRIMARY)

KPESSED

DIRECTORATE OF EDUCATION  
MERGED AREAS

Khyber Pakhtunkhwa

Main G.T Road Near Firdos Bus Stop Peshawar Pakistan

Phone No. (091-9330240) (091-9331240)

No.

Date Pesh: the 12492 30/8/2021

To

**Most Immediate / Court Matter**

The Secretary  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

**Subject: Seeking of legal Opinion / CPLA in Service Appeal No. 650/2018 filed by Mr. Khaista Sher & 40 Others VS Chief Secretary Khyber Pakhtunkhwa & others.**

Dear Sir,

Reference to the subject cited above and to enclosed herewith a photocopy of Judgment passed by the Honorable Service Tribunal Khyber Pakhtunkhwa dated 14-07-2021 in Service Appeal No. No.650/2018 & 40 others titled Khaista Sher & Others VS Chef Secretary Khyber Pakhtunkhwa & Others.

1. That In light of Presidential Order No. 13 of 1972 and in pursuance of Elementary & Secondary Education Department, Khyber Pakhtunkhwa Notification No. SO (B & A)/1-18/E & SE/2012 Dated Peshawar, 11-07-2012, the FATA Secretariat vide Notification No. FS/SO/(Edu)/SSD/Up-gradation/2882-94 dated 22-06-2016, the posts of different categories / cadres of Teachers working in FATA, were upgraded as an incentive for higher pay scales with effect from 01-07-2012
2. That Vide notification No. FS/SO/(Edu)/SSD/Up-gradation/2882-94 dated 22-06-2016, the Directorate of Education Erstwhile FATA has been conducted a meeting of Departmental Promotion Committee for adjustment of teachers of Erstwhile FATA dated 20-02-2017 (w.c.f 20-02-2013) on the analogy of Directorate of E & SE Khyber Pakhtunkhwa, Peshawar, wherein, the appellant named Khaista Sher & others were adjusted on the upgraded posts of senior cadre (Senior CT (BS-16)). It may be mentioned over here that the senior cadre posts i.e Senior CT, Senior AT etc were upgraded from CT, AT, TT etc by giving share from each category, there was no new creation posts for Senior cadre.
3. That the Senior CT Teacher (appellants) were promoted to the post of SST on 13-10-2017 with immediate effect while the promotion order from Senior CT Teacher to SST in settled district (Khyber Pakhtunkhwa) was issued on 31-10-2014, the reason was that at that time the service structure was not available in erstwhile FATA and the federal Government granted approval of the service structure in erstwhile FATA on 22-6-2016 on the analogy of Khyber Pakhtunkhwa .
4. That feeling aggrieved from the notification dated 13-10-2017, the appellants filed service appeal with the prayer that on acceptance of this service appeal the promotion order dated 13-10-2017 of Respondent No.4 be declared from 31-10-2014 not from 13-10-2017.

The Honorable Service Tribunal decided that case in favor of the appellants and directed that "we have observed that seniority of the appellants as well as their other counterparts working at District level had been maintained at Agency / District level before promotion their to the post of SST, whereas upon promotion to the post of SST, the seniority is maintained at Provincial level and the appellants who were promoted in 2017 in comparison to those, who were promoted in 2014, would definitely find place in the bottom of the seniority list maintained at Provincial level dim future prospects of their promotions, as well as they were kept deprived of the Financial benefits accrued to them after promotion for no fault of them, hence they were discriminated. It was noted with concern that the only reason for their delayed promotion was slackness on part of directorate of Education Ex-FATA and its subordinate offices at Agency level, which had delayed their promotions for more than three years for no fault of the appellants.

In view of foregoing discussion, the instant appeals are accepted and all the appellants are held entitled for promotion from the date, the first batch of their other colleagues at provincial level were promoted in the year 2014 with all consequential benefits.

You are therefore requested to approach Law Department Khyber Pakhtunkhwa for legal opinion/filing of CPLA in the Supreme Court of Pakistan please.

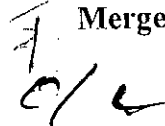
**Enclosure:**

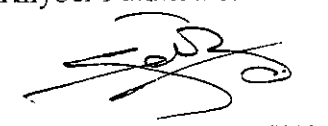
1. Service Appeal.
2. Comments offered by Department.
3. Judgment.
4. Notification dated 22-10-2016.

Endst: No. 12493-795  
Copy forwarded to:-

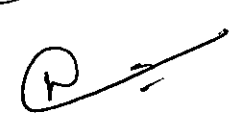
1. Additional Director (Estab) Merged Areas Khyber Pakhtunkhwa.
2. Deputy Director (Legal) Elementary & Secondary Education Khyber Pakhtunkhwa.
3. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa.

  
 Deputy Director (F/A)  
 Merged Areas



  
 Deputy Director (F/A)  
 Merged Areas



Attested  


Annex "D"

ATTN: P  
S.V. PA

Directorate of Elementary & Secy: Education  
Khyber Pakhtunkhwa, Peshawar.  
No. 495W/F.No. SST Promotion to SS Posts  
Dated Peshawar the 7/8 2014

To  
The Director of Education (FATA),  
FATA Secretariat Warsak Road, Peshawar.

Subject: - DEPARTMENTAL PROMOTION FROM SCTS/CT/SDM/DM/ SAT/ AT/STT/TT & S, QARIES/QARIES TO THE POST OF SSTs (BS-16) REGULAR.  
*SPT/PSI*

Memo:  
In continuation of this Directorate letter No. 4874 dated 06-08-2014 on the subject cited above and to request you to fill the vacant posts of SST (General/Science) in Government Higher Secondary/High & Middle Schools (M&F) FATA by promotion of in-service teachers under the existing rules already conveyed to you under the above cited letter number and date under intimation to all concerned.

*[Signature]*  
Deputy Director (Estb)  
Elementary & Secy: Education  
Khyber Pakhtunkhwa  
*[Signature]*

Endst: No. \_\_\_\_\_

Copy of the above is forwarded for information to:-

1. PS to Minister for E&SE Khyber Pakhtunkhwa.
2. PS to Secretary to Govt. of Khyber Pakhtunkhwa, E&SE Department.
3. PA to Director (E&SE) Khyber Pakhtunkhwa, Peshawar.

Deputy Director (Estb)  
Elementary & Secy: Education  
Khyber Pakhtunkhwa

Attested  
*[Signature]*

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*[Signature]*  
ATTESTED

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ATTESTED

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Ann x — "K"



FATA SECRETARIAT  
DIRECTORATE OF EDUCATION  
KHIBER PAKHTUNKHWA HIGHWAY ROAD PESHAWAR  
PHONE: 091-92-6106 FAX: 091-92-6106

No. \_\_\_\_\_ Date \_\_\_\_\_ /2018

**Notification**

In pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No SO/PE/14 5/SSRC/Mot/103/2017 Teaching Cadre dated 28<sup>th</sup> July 2017 recommendations of the Departmental Promotion Committee, the following SGTs/CTs, SPTs/PTs, SATs/ATs, SFTs/TTs, Senior Quasis/Quasis, PSITs/SPTs/PSIs of Orakzai Agency are hereby promoted to the post of SST (Bio-Chem/SS) (Phy-Math) SST (General) Grade 16 at EPS-16 (A.S. 18910-1520 04310) plus usual allowances as prescribed under the rules of service under the existing position on the terms and conditions prescribed with immediate effect from the date of public service.

**C. SST (General)**

**PROMOTION OF Sr: CT/CT TO SST (General) BPS-16.**

Total No. of SST General (M) Posts vacant Posts	40
25% share initial recruitment	10
75% share for Promotion	30
40 % Share of promotion of Sr: CT/CT	16
Posts available for promotion	16
Promoted through this order	14+2=16

S. No	S.I. No	Name of Official	Place of Posting	Date of Birth	Date of Appointment Regular/CT	Qualification	Remarks
1	122	Akmal Hassan	GHS Awi Mela	15/04/79	25/02/17	BA/B.Ed	Selected for promotion to the post of General (BPS 16) on 28/7/18
2	233	Syed Sajjad Khan	GHS Spidar	10/01/79	25/02/17	BA/B.Ed	Selected for promotion to the post of General (BPS 16) on 28/7/18

**Terms and conditions:-**

- 1 They would be on probation for a period of one year extendable for a further period of one year.
- 2 They will be governed by such rules and regulations as and when issued from time to time.
- 3 Their services can be terminated at any time, if on their part performance is unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the law framed from time to time.
- 4 Charge report should be submitted to all concerned.
- 5 No TA/DA is allowed for joining his duty.
- 6 They will give an undertaking to be recorded in their service book to the effect that if any over payment is made to him/her in the light of this order will be recovered and if he/she is wrongly promoted, he/she will be reverted.
- 7 Before handing over charge once again their document may be checked if they have not the prescribed qualifications as per rules, they may not be handed over charge of the post.
- 8 The prescribed qualifications/ documents may be verified from the concerned Universities/ Institutions by the AEO concerned.

(Nashim Khan)  
Director Education FA

Dated Peshawar this \_\_\_\_\_

3202-11

Copy forwarded for information and necessary action to the:-

1. Accountant General (P) Sd/O, Peshawar.
2. Director E&SE Khyber Pakhtunkhwa Peshawar.
3. Agency Education Officer Orakzai Agency.

**ATTESTED**

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1. Agency Accounts Officer Orakzai Agency.
5. PS to ACS FATA.
6. PS to the Secretary SSD, FATA Secretariat, Peshawar.
7. PS to the Secretary Finance Department FATA Secretariat Peshawar.
8. PA to Director Education, FATA.
9. Promotees Concerned.
10. M/File.

28/7/18  
Add: Director (Estab)  
Directorate of Education, FATA

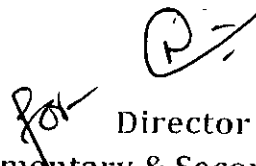


**DIRECTORATE ELEMENTARY & SECONDARY  
EDUCATION KHYBER PAKHTUNKHWA, PESHAWAR.**

**AUTHORITY LETTER**

I Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar do hereby authorize Mr. Muhammed Imran Assistant (Litigation) of this Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar to attend the Khyber Pakhtunkhwa Service Tribunal in connection with filing of para wise comments in Service Appeal No. 1380 / 2022 Titled Akmal Hussain VS Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department.

Dated 11 / 07 / 2023

  
for Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar.

*Attested*  
