


FORM OF ORDER SHEET

Court of _____

Appeal No. 1559/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	01/08/2023	<p>The appeal of Syed Salman Hashmi resubmitted today by Mr. Waleed Adnan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on</p> <p style="text-align: right;">By the order of Chairman  REGISTRAR</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL NO. 1559 /2023

SYED SALMAN HASHMI VS EDUCATION DEPTT:

INDEX

S.NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of appeal with affidavit	1-3
2.	Application for Condonation	4
3.	appointment order and extension order	A	5-11
4.	charge sheet and reply	B	12-13
5.	order dated 02-11-2022	C	14
6.	departmental appeal and appellate order	D	15-17
7.	regularization order dated 22-06-2023	E	18-19
8.	Vakalat nama	20

APPELLANT

THROUGH:

WALEED ADNAN

ADVOCATE

BC: 14-4772

CELL: 0333-9741001

CNIC: 11101-4813922-1

EMAIL: advwaleed92@gmail.com

1-

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 1559 /2023

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 6663

Date 24/07/23

Mr. Syed Salman Hashmi, SST Bio/Chem (BPS-16),
Government High School No.2, Bannu.

..... APPELLANT

VERSUS

- 1- The Secretary Elementary & Secondary Education, Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director Elementary & Secondary Education, Peshawar.
- 3- The DEO (Male) Bannu.

..... RESPONDENTS

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED APPELLATE ORDER DATED 16-02-2023 WHEREBY ONE ANNUAL INCREMENT HAS BEEN STOPPED AND THE INTERVENING PERIOD HAS BEEN CONSIDERED AS LEAVE WITHOUT PAY.

PRAYER:

That on acceptance of this appeal the impugned appellate order dated 16-02-2023 may very kindly be modified/rectified to the extent that one annual increment may please be released/ restored and the intervening period may be treated as period spent on duty with all back benefits. Any other remedy which this august Tribunal deems fit may also be awarded in favor of the appellant.

R/SHEWETH:

ON FACTS:

Brief facts giving rise to the present appeal are as under:

R/SHEWETH:

1. That the appellant was initially appointed as SST Bio/Chem (BPS-16) on contract basis vide order dated 14-09-2018 where after his contract was extended vide order dated 05-11-2019. Copies of the appointment order and extension order are attached as annexure.....**A.**
2. That the appellant has been serving the department with devotion and sincerity since his initial appointment.

- 3. That during service the appellant was served a charge sheet on basis of false allegations of misconduct in response to which the appellant filed a detailed reply. Copies of the charge sheet and reply are attached as annexure.....**B.**
- 4. That astonishingly the adhoc appointment of the appellant was discontinued vide impugned order dated 02-11-2022. Copy of the order dated 02-11-2022 is attached as annexure.....**C.**
- 5. That the appellant filed departmental appeal against the impugned order which was accepted but a penalty of stoppage of one year annual increment was imposed upon the appellant and the intervening period from the date of withdrawal of his contract appointment order to the date of restoration of his contract appointment was considered as leave without pay vide appellate order dated 16-02-2023. Copies of departmental appeal and appellate order are attached as annexure.....**D.**
- 6. That in the meanwhile the appellant was regularized vide order dated 22-06-2023. Copy of regularization order dated 22-06-2023 is attached as annexure.....**E.**
- 7. That the appellant feeling aggrieved from the above mentioned impugned appellate order and having no other efficacious, remedy preferred present service appeal on the following grounds amongst others.

GROUND:

- A- That the impugned orders dated 02-11-2022 and 16-02-2023 are against the law, facts, norms of natural justice and materials on the record hence not tenable and impugned order dated 16-02-2023 is liable to be modified/ rectified.
- B- That appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the constitution of Islamic Republic of Pakistan 1973.
- C- That no show cause or statement of allegation was served upon the appellant which is utter violation of E&D Rules 2011.
- D- That it is pertinent to mention here that no regular inquiry has been conducted into the matter hence the impugned appellate order is void, therefore liable to be vitiated.




- E- That the respondents acted in arbitrary and malafide manner while issuing the impugned order followed by the impugned appellate order.
- F- That the appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

Dated: 14-07-2022


APPELLANT
SYED SALMAN HASHMI

THROUGH:


WALEED ADNAN

KAMRAN KHAN
&

UMAR FAROOQ
ADVOCATES

AFFIDAVIT

I, Mr. Syed Salman Hashmi, SST Bio/Chem (BPS-16), Government High School No.2, Bannu, do hereby solemnly affirm and declare that the contents of the accompanying **Appeal** true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.


DEPONENT

4-

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

CM NO. _____/2023

IN

APPEAL NO. _____/2023

SYED SALMAN HASHMI

VS

EDUCATION DEPTT:

APPLICATION FOR CONDONATION OF DELAY IN FILING THE
ABOVE NOTED APPEAL

R.SHEWETH:

- 1- That the appellant has filed an appeal along with this application in which no date has been fixed so far.
- 2- That the appellant prays for the condonation of delay in filing the above noted appeal on the following grounds inter alia:

GROUND OF APPLICATION:

- A- That after the appellate order dated 16.02.2023, the case of the appellant was placed before the competent authority for regularization and once he was regularized vide order dated 22.06.2023, the appellant approached this august tribunal.
- B- That the valuable rights of the appellant are involved in the case hence the appeal deserves to be decided on merit.
- C- That it has been the consistent view of the Superior Courts that cases should be decided on merit rather on technicalities including the limitation. The same is reported in 2004 PLC (CS) 1014 and 2003 PLC (CS) 76.

It is therefore prayed that on acceptance of this application the delay in filing the above noted appeal may please be condoned.


APPELLANT

SYED SALMAN HASHMI

THROUGH:


WALEED ADNAN

ADVOCATE HIGH COURT

"A"
-5-

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



APPOINTMENT.

Consequent upon recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the post of Secondary School Teacher (SST Bio Chem), (SST Maths Phy), (SST General) School based in DPS-16 (Rs. 15880-1280-54280) @ Rs. 15880/- fixed plus usual allowances as admissible under the rules on adhoc basis on Contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with effect from the date of their taking over charge:-

(SST Bio Chem)

Sr	RollNo	Name	NIC	Address	Academic Marks	NTS Marks	Total Marks	School Name
1	12100415	Muhammad Abrar Khan	11101-2536640-3	Nizam Bazar Porez Khoni Khel	65.74	83	154.74	GHS Naz Jaffar
2	121000786	Saleemullah Khan	11101-6855919-3	Kotla Hay Zar Khan Mandow	62.19	89	151.19	GHS No 1 Bannu
3	121000549	Kamranullah Khan	11101-0510933-1	Shamsi Khel PO Ghorwala Bannu	60.31	89	149.31	GHS Mamash Dardar
4	121000924	Munibullah Khan	11101-1292689-5	Imal Kila PO Azeem Kila Bannu	64.34	83	147.34	GHS Ghorwala
5	121000609	Iftah Ali Shah	11101-2813090-1	Masqul Gulbadn Mandow Bannu	54.30	90	144.30	GHS Jani Khel
6	121000986	Shamim Ullah Khan	11101-8467237-7	Bachali Jani Khel Bannu	55.61	84	139.61	GHS Adnan Sapuli Khel
7	291001762	Muhammad Tanvir Khan	11101-3107981-1	Ilkhan Khel PO Mamash Khel	77.83	61	138.83	GHS Durr Saidan Mamash Khel
8	121000713	Muhammad Nasir Khabli	11101-8693370-1	Grand Abad Bazar Ahmad Khan	73.42	64	137.42	GHS Shanbaz Amir Khel
9	121000905	Ibrar Ahmad	11101-8806282-3	Amir Mujahid Khan PO Amir Khatun Islami Bannu	74.20	62	136.20	GHS Amal Barbosh Daud Shah
10	121000965	Syed Sahban Hashmi	11101-7372987-3	Bannu Town Ship	75.90	60	135.90	GHS No 2 Bannu
11	121000723	Muhammad Ilyas Khan	11101-6423773-5	VILLAGE 8 PO Jandi Khel	75.81	60	135.81	GHS Wali Zai Kila
12	121000749	Hanifullah Khan	11101-3104037-7	Fazl Abad Laxidat PO Mandow Bannu	74.98	60	134.98	GHS Khan Zaman Norar
13	121001012	Noor Zoda	11101-1688837-5	Khander Khan Khel PO Azeem Kila Bannu	54.24	60	134.24	GHS Land Jalandar
14	121000648	Kamranullah Khan	11101-7950047-7	Akhundani Tiler Khel Bannu	68.08	66	134.08	GHS Mira Khel
15	121001062	Farrat Ullah Khan	11101-2012799-5	Mirbaz Barakzai PO Florar Bannu	68.67	65	133.67	GHS Hakim Basharat
16	121000851	Zeeshan Khan	11101-6035135-3	Ganji Daud Shah PO Pupal Bazar Bannu	68.99	64	132.99	GHS Mamashan

**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR**

APPOINTMENT

Consequent upon recommendation of the Departmental Selection committee, appointment of the following candidates are hereby ordered against the post of Secondary School Teacher (SST Bio Chem), (SST Maths Phy), (SST General) School Based in BPS-16 (Rs.15880-1280-54280) @ Rs.15880/- fixed plus usual allowances as admissible under the rules on adhoc basis on contract under the existing policy of the Provincial Government, in Teaching cadre on the terms and condition given below with effect from the date of their taking over charge:-

Sr	Roll No.	Name	NIC	Address	Academic Marks	NTS Marks	Total Marks	School Name
1.	12100415	Muhammad Abrar Khan	11101-863664-3	Nizam Bazar Parez Khoni Khel	66.74	83	154.74	GGs Nor Jaffar
2.	12100786	Saleemullah Khan	11101-6855191-3	Kolka Haq or Khan Mandew	62.19	89	151.19	GHS No.1 Bannu
3.	12100549	Kamranullah Khan	11101-0510693-1	Sahmshi Khel PO Ghonwala Bannu	60.31	89	149.31	GHS Mamoki Dardanz
4.	12100924	Mohibullah Khan	11101-1296969-5	Imal Kila PO Azeem Kila Bannu	64.34	83	147.34	GHS Ghonwala
5.	121000609	Irfan Ali Shah	11101-2813090-1	Masoori Gulbadin Mandow Bannu	54.36	90	144.36	GHS Jani Khel
6.	121000986	Shamim Ullah Khan	11101-8467237-7	Banaki Jani Khel BGannu	55.61	64	139.61	GHS Adnan Sardi Khel
7.	291001762	Muhammad Tahir Khan	11101-3107981-1	Ibrahim Khel PQ Mash Khel	77.83	61	138.83	GHS Dheri Saidan Mamash Khel
8.	121000713	Muhammad Nasir Khabir	11101-8693370-1	Gharib Abad Bazar Ahmad Khan	73.42	64	137.42	GHS Shahbaz Azmat Khel
9.	121000995	Ibrar Ahmad	11101-8006292-1	Amin Mughel Khan PO Almarkanal Islami Bannu	74.20	62	136.20	GHS Ajmal Bartashti Daud shah
10.	121000965	Syed Salman Hashmi	11101-7372987-3	Bannu Town Ship	75.90	60	135.90	GHS No.2 bannu
11.	121000723	Muhammad Ilyas Khan	11101-0423993-5	Village & PO Jandu Khel	75.81	60	135.81	GHS Wali Zar Kila
12.	121000749	Hanifullah Khan	11101-3104037-7	Faqir Abad Landidak PO Haved Bannu	74.89	60	134.98	GHS Khan Zaman Norar
13.	121001012	Noor Zada	11101-1688837-5	Khander Khan Khel PO Azeem Killa Bannu	54.24	60	134.24	GHS Landi Jalandar
14.	121000648	Kamranullah Khan	11101-7850047-7	Akhundan Tiler Khel Bannu	68.08	66	134.08	GHS Mira Khel
15.	121001062	Farhat Ullah Khan	11101-2012799-5	Marbaz Barakzai PO Norar Bannu	68.67	65	133.67	GHS Hakim Baharat
16.	121000851	Zeeshan Khan	11101-6035136-3	Ganj Daud Shah PO Pulpal Bazar Bannu	68.99	64	132.99	GHS MMandan

-6-

(SST Maths Phy)

Sr	RollNo	Name	NIC	Address	Academic Marks	NTS Marks	Total Marks	School Name
1	12200252	Farhan	11101-7448891-5	Village 3 PO Kachkol Asad Khan Bannu	50.95	88	144.25	GHS Dandi Wair
2	292001567	Muhammad Sufian Saddiq	11101-9152291-3	Village Noormall PO Jandu Khel Bannu	78.51	60	138.51	GHSS Dilasa Khan Mandew
3	122000452	Wascoomutan Shah	11101-4280916-3	Village 3 PO Koli Sadal Bannu	78.31	56	134.31	GHS Khujari Babar
4	122000325	Faheem Ud Din	11101-5121717-5	Azam Danda Khel Sukan Bannu	68.09	66	134.09	GHSS, Bangi Khan Khujari

(SST General)

Sr	RollNo	Name	NIC	Address	Academic Marks	NTS Marks	Total Marks	School Name
1	294002960	Mahsin Shah	11101-2845434-6	C/O DEO (Male) Bannu	71.73	82	153.73	GHS Mirza Ali Khan Gulbadin Landidak
2	124001036	Tahir Aman	11101-3204700-7	C/O DEO (Male) Bannu	75.26	77	152.26	GHS Dhandi Killa Umarrai sunjok
3	123001136	Azqab Ali Khan	11101-1353265-3	C/O DEO (Male) Bannu	67.2	81	149.2	GHS Kotba Bilawat Khan
4	124002940	Muhammad Asif Khan	11101-7825362-9	C/O DEO (Male) Bannu	73.52	74	147.52	GHS Hakim Haved
5	124000792	Abdul Hafeem Khan	11101-4038470-7	C/O DEO (Male) Bannu	56.87	90	145.87	GHS No 2
6	124000577	Anif Khan	11101-6697897-5	C/O DEO (Male) Bannu	73.54	73	146.54	G/S Menmoor Wali Noor Jani Khel
7	124000686	Aamir Ali Khan	11101-6080388-5	C/O DEO (M) Bannu	54.51	81	145.51	GHS Nar Jafar
8	123001043	Khayolullah Khan	11101-3588300-5	C/O DEO (Male) Bannu	53.5	89	142.5	GHS, Musa Khan Jani Khel
9	123000514	Waqd Ali Khan	11101-3536179-3	C/O DEO (Male) Bannu	65.27	77	142.27	GHS Amir Ghaffar Gora Baka Khel
10	294003423	Hamid Ul Haq	11101-3662878-1	C/O DEO (Male) Bannu	63.12	79	142.12	GHS Amir Ghaffar Gora Baka Khel
11	293001970	Ihtesham Nawaz	11101-2670971-7	C/O DEO (Male) Bannu	64.87	77	141.87	GHSS, Baka Khel
12	123001472	Akramullah Khan	11101-9010413-7	C/O DEO (Male) Bannu	60.75	81	141.75	GHSS, Baka Khel
13	123001181	Shahidullah Khan	11101-6635801-3	C/O DEO (Male) Bannu	66.68	75	141.68	GHS No 2 Bannu
14	123000933	Taseer Ahmad Khan	11101-0997970-7	C/O DEO (Male) Bannu	48.5	93	141.5	GHSS, Baka Khel
15	124001210	Abid Ali Khan	11101-6950832-5	C/O DEO (Male) Bannu	63.54	87	140.54	GHS, Wali Noor Jani Khel

(SST Maths Phy)

Sr	Roll No.	Name	NIC	Address	Academic Marks	NTS Marks	Total Marks	School Name
1.	122000262	Fargab	11101-7448891-5	Village & PO Kachkol Abad Khan Bannu	56.95	88	144.95	GHS Dandi Wazir
2.	292001567	Muhammad Sultan Sadiq	11101-9152291-3	Village Noormail PO Jandu Khel Bannu	78.51	60	138.51	GHSS Dilasa Khan Mandew
3.	122000452	Waseemullah Shah	11101-4280916-2	Village & PO Kali Sadai Bannu	78.31	56	134.31	GHS Shujari Babar
4.	122000325	Faheem Ud Din	11101-5121717-5	Azam Danda Khel Sultan Bannu	68.09	56	134.09	GHS Bangi Khan Khujari

(SST General)

Sr	Roll No.	Name	NIC	Address	Academic Marks	NTS Marks	Total Marks	School Name
1.	294002960	Mohsin Shah	11101-2845434-5	C/O DEO (Male) Bannu	71.73	82	153.73	GMS MirzaAli Khan Gulbadin Landidak
2.	124001035	Tahir Amin	11101-3294700-7	C/O DEO (Male) Bannu	75.26	77	152.26	GHS Bhatti Killa Umarzai Punjab
3.	123001136	Aaqab Ali Khan	11101-1343265-3	C/O DEO (Male) Bannu	67.2	61	148.2	GHS Kotka Bilawar kHan
4.	12400948	Muhammad Asif Khan	11101-7825362-9	C/O DEO (Male) Bannu	73.52	74	148.52	GHS Hakim Haved
5.	12400792	Abdul Haleem Khan	11101-4038479-7	C/O DEO (Male) Bannu	56.87	90	146.87	GHS No.2
6.	12400577	Arif Khan	11101-6697897-5	C/O DEO (Male) Bannu	73.54	73	146.54	GMS Mehmood Wali Noor Jani Khel
7.	124000686	Aamir Ali Shah	11101-6080388-5	C/O DEO (Male) Bannu	54.51	91	145.51	GHS Nar Jaffar
8.	123001043	Kifayatullah Khan	11101-3588360-5	C/O DEO (Male) Bannu	53.5	89	142.5	GHS Musa Khan Jani Khel
9.	1230005154	Wajid Ali Khan	11101-3536179-3	C/O DEO (Male) Bannu	65.27	77	142.27	GHS Amor GHaffar Gora Baka kHel
10.	294003425	Hamid Ul Haq	11101-3667878-1	C/O DEO (Male) Bannu	63.12	79	142.12	GHS Amoor Ghafar Gora Baka Khel
11.	293001970	Ihtesam Nawaz	11101-2670871-7	C/O DEO (Male) Bannu	64.87	77	141.87	GHS Baka Khel
12.	12001472	Akramullah Khan	11101-9010413-7	C/O DEO (Male) Bannu	60.76	81	141.76	GHSS Baka Khel
13.	123001181	Shahidullah Khan	11101-6635801-3	C/O DEO (Male) Bannu	66.68	75	141.68	GHS No.1 Bannu
14.	123000933	Taseer Ahmad Khan	11101-0997970-7	C/O DEO (Male) Bannu	48.5	93	141.5	GHSS Baka kHel
15.	124001216	Abid Ali Khan	11101-6850832-5	C/O DEO (Male) Bannu	53.54	87	140.54	GHS Wali Noor Jani Khel

7-

TERMS & CONDITIONS.

1. NO TA/DA etc is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. Appointment is purely on temporary & contract basis initially for one year wef 20th September, 2018 to 19th September, 2019.
4. He should not be handed over charge if he exceeds 35 years or below 19 years of age. Age relaxation case may be submitted to competent authority.
5. If any candidate is over age less than two years, their upper age limit less than two years is hereby relaxed.
6. If any meritorious candidate is deprived from appointment by this order and the competent authority accepted his appeal, the appointment order of the low merit candidate will be withdrawn and adjustment order will be reviewed according to merit.
7. Appointment is subject to the condition that the certificate/documents must be verified from the concerned authorities by the DEO (concerned), any one found producing bogus Certificate will be reported to the law enforcing agencies for further action.
8. His services are liable to termination on one month's notice from either side. In case of resignation without notice his one-month pay/allowances shall be forfeited to the Government.
9. Pay will not be drawn until and unless a certificate to the effect by DEO (concerned) is issued that his certificates are verified.
10. He should join his post within 15 days of the issuance of this notification. In case of failure to join the post within 15 days of the issuance of this notification, his appointment will expire automatically and no subsequent appraisal etc shall be entertained.
11. The candidate concerned should produce Health & Age certificate duly signed by Medical Superintendent concerned before taking over charge.
12. He will be governed by the rules and regulations in the field and as may be issued from time to time by the Govt.
13. His contract shall be discontinued at any time, in case his performance is found unsatisfactory.
14. His appointment is made on School based, He will have to serve at the place of posting, and His service is not transferable to any other station.
15. Before handing over charge once again their document may be checked if they have not the required relevant qualifications as per rules, they may not be handed over charge of the post.

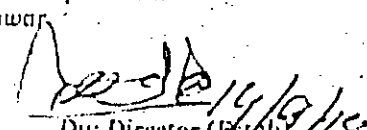
(Farid Ahmad Khattak)

Director

Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

569-75
1st: No. / File No.1/ /SST/Adhoc/Apptt./2018 Dated Peshawar the 14/09/2018.
Copy forwarded for information and necessary action to the:-

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


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

TERMS & CONDITIONS.

1. NO TA/DA etc is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. Appointment is purely on temporary & contract basis initially for one year wef 20 September, 2018 to 10 September, 2019
4. He should not be handed over charge if he exceeds 35 years or below 19 years of age. Age relaxation case may be submitted to competent authority.
5. If any candidate is over age less than two years, their upper age limit less than two years is hereby relaxed.
6. If any maritorious candidate is deprived from appointment by this order and the competent be withdrawn and adjustment order will be reviewed according to merit.
7. Appointment is subject to the condition that the certificate/documents must be verified from the concerned authorities by the DEO (concerned), ung one found producing bogus Certificate will be reported to the law enforcing agencies for further action.
8. His services are liable to termination on one month's notice from either side. In case of resignation without notice his one-month pay/allowances shall be forfeited to the Government.
9. Pay will not be drawn until and unless a certificate to the effect by DEO (concerned) is issued that his certificates are verified
10. He should join his post within 15 days of the issuance of this notification. In case of failure to join the post within 15 days of the issuance of this notification, his appointment will expire automatically and no subsequent appeal etc shall be entertained,
11. The candidate concerned should produce Health & Age certificate duly signed by Medical Superintendent concerned before taking over charge.
12. He will be governed by the rules and regulations in the field and as may be issued from time to time by the Govt.
13. His contract shall be discontinued at any time, in case his performance is found unsatisfactory
14. His appointment is made on School based. He will have to serve at the place of posting, and His service is not transferable to any other station.
15. Before handing over charge once again their document may be checked if they have not the required relevant qualifications as per rules, they may not be handed over charge of the post.

(Farid Ahmad Khattak)

Director

Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst.569-75 /File No.4//SST/Adhoc/Apptt:/2018 Dated Peshawar the 14/09/2018.

Copy forwarded for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Secretary Khyber Pakhtunkhwa Public Service Commission Peshawar.
3. District Education Officer (Male) concerned.
4. District Accounts Officer Concerned
5. Official Concerned.
6. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
7. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar
8. M/File.

Dy: Director (Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

- 8 -

Notification Of the Contract Extension of SSTs (BI) District Bannu - I
DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER
PAKHTUNKHWA PESHAWAR

NOTIFICATION

Under the provision of Section 4 of Khyber Pakhtunkhwa (Appointment, Deputation, Posting and Transfer of Teachers, Instructors and Doctors) Regulatory Act, 2011, the contract period of the following Secondary School Teachers (SST Bio-Chem) (SST Phy-Maths) and (SST General), vide Edustt:No.569-75/File No.1/SST /Adhoc/Appointment/2018 dated 14-09-2018, is hereby extended with effect from 14th September, 2019 up to 13th September 2020 on School based or till the arrival of the recommendees of the Khyber Pakhtunkhwa Public Services Commission, whichever is earlier, in NTS-16 @ Rs.18910/- fixed plus usual allowances as admissible under the rules on adhoc/contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below:

SST (Bio/Chem)

S#	Roll No.	Name	F/Name	Address	Academic Marks (Out of 100)	NTS Marks (Out of 100)	Total marks (Out of 200)	Name of School
1	1210041 5	Muhammad Abrar Khan	Nadir Khan	Nizam Istar Parva Khani Khel CNIC 11101- 8636648-3	66.74	88	154.74	GHS Star Jafar
2	1210007 88	Safir Ullah Khan	Amin Ullah Khan	Kotla Haji Zar Khan Mandew CNIC 11101- 6855919-3	62.19	89	151.19	GHS No 1 Bannu
3	1210005 49	Kamran Ullah Khan	Masti Khan	Shamshi Khel P/O Ghoriwala CNIC 11101- 6510693-1	60.31	89	149.31	GHS Marnahi Dardariz
4	1210009 24	Mahib Ullah Khan	Mir Daraz Khan	Imal kala P/O Aram kala Bannu CNIC 11101- 1292669-5	64.34	83	147.34	GHS Ghoriwala
5	1210008 09	Irfan Ali Shah	Islam barchah	Mazoori Gul badan Mandew Bannu CNIC 11101- 2813090-1	54.36	90	144.36	GHSS jani Khel Bannu
6	1210009 86	Shamim Ullah Khan	Dil Nawaz Khan	Hachaki Jani Khel Bannu CNIC 11101- 8467237-7	53.61	84	139.61	GHS Adnan Sardi Khel
7	1210009 95	Faraz Ahmad	Muhamad Hashim	Amin Moghal Khel P/O Almarkaz Islami Bannu CNIC 11101- 8206282-1	74.20	62	136.20	GHS Ajmal Barlaabti
8	1210009 65	Syed Soleman Hashmi	Syed Nadraam Hashmi	Bannu Township CNIC 11101- 7372987-3	73.90	60	133.90	GHS No 2 Bannu
9	1210007 49	Hamid Ullah Khan	Mir Zali Khan	Faqir abad Landidak P/O Haved Bannu CNIC 11101- 3104937-7	74.92	60	134.92	GHS Khan Zamran Nuruz

**Notification Of the Contract Extension of SSTs (M) District Bannu
DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER
PAKHTUNKHWA PESHAWAR**

NOTIFICATION

Under the provision of Sections of Khyber Pakhtunkhwa (Appointment, Deputation, Posting and Transfer of Teachers, Instructors and Doctors) Regulatory Art, 2011, the contract period of the following Secondary School Teachers (SST Bio-Chem) and (SST General), vide Edusstt:No.569-75/File No.1/SST /Adhoc/Appointment/2018 dated 14-09-2018, is hereby extended with effect from 14 September 2010 up to 13 September 2020 on School based or till the arrival of the recommendees of the Khyber Pakhtunkhwa Public Service Commission, whichever is earlier, in BPS-16 @ 18910/- fixed plus usual allowances as admissible under the rules on adhoc/contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below:

SST (BIO/Chem)

Sr	Roll	Name	F/name	Address	Academic Marks (out of 100)	NTS Marks (out of 100)	Total marks (out of 100)	Name of school
1.	12100415	Muhammad Abrar Khan	Nadir Khan	Nizam Bazar Parvec Khni Khel . CNIC 11101-8636640-3	66.74	88	154.74	GHS Naz Jafar
2.	12100788	Safir Ullah Khan	Amin Ullah Khan	Kotka Haji Zar Khan Mandew CNIC No.11101-6855919-3	62.19	89	151.19	GHS No.1 Bannu
3.	121000549	Kamran Ullah Khan	Masti Khan	Shamshi Khel PO GhoriWala CNIC No.11101-0510693-1	60.31	89	149.31	GHS Manuki Dardariz
4.	121000924	Muhib Ullah Khan	Mir Daraz Khan	Imal Kala P.O Azim Kala Bannu CNIC No.11101-1292669-5	64.34	83	147.34	GHS Ghori Wala
5.	121000809	Irfan Ali Shah	Islam Badshah	Masoori Gul Badin Mandew Bannu CNIC NO.11101-2813090-1	54.36	90	144.36	GHSS JaniKhel Bannu
6.	121000986	Shamim Ullah Khan	Dil Nawaz Khan	Bachiki Jani Khel Bannu CNIC No.11101-1467237-7	55.61	84	139.61	GHS Adnan Sardi Khel
7.	121000995	Ibrar Ahmad	Muham mad Hashim	Amin Mughal Khel P.O Almarkaz Islami Bannu CNIC No.11101-1806282-3	74.20	62	136.250	GHS Ajmal Barlashti
8.	121000965	Syed Suleman Hashmi	Syed Nadeem Hashmi	Bannu Township CNIC No.11101-7372987-3	75.90	60	135.90	GHS No.2, Bannu
9.	121000749	Hanif Ullah Khan	Mir Zali Khan	Faqir abad Landidak P.O Haved Bannu CNIC No.11101-3104037-7	74.98	60	137.98	GHS Khan ZUman Narar



Notification Of the Contract Extension of SSTs (SI) District Bannu 2

10	1210010 12	Noor Zada	Mir Afzal Khan	Khasfer Khan Khel P/O Azim Kals Banna CNIC 11101- 1631837-5	54.24	80	134.24	GHS Larodi Jalandar
11	1210006 48	Kamran Ullah Khan	Gul Faraz Khan	Akhondan tiler Khel Banna CNIC 11101- 7950047-7	63.08	66	134.08	GHS Mira Khel Banna
12	1210008 51	Zeehan Khan	Rasta Daz Khan	Ganj Daud Shah P/O Pipal Bazar Banna CNIC 11101- 6035136-3	68.99	64	132.99	GHS Mandian

SST (Maths-Physics)

S. No	Roll No.	Name	F/Name	Permanent Address	Academic Marks(Out of 100)	NTS Marks (Out of 100)	Total marks (Out of 200)	Name of School
1	122000262	Farhan	Iqbal Muhammad Khan	Village P/O Kachkot Asad Khan Banna CNIC 11101- 7448591-9	56.95	88	144.95	GHS Dandi Wazir
2	292001567	M. Sofyan Sadiq	Shah Niyaz Khan	Noormali P/O Janda Khel Banna CNIC 11101- 9152291-3	78.51	60	138.51	GHS Dilara Khan Mandrew
3	122000452	Wasim Ullah Shah	Shamraz Shah	Village P/O Koti Sadat Banna CNIC 11101- 4280916-3	71.31	56	134.31	GHS Khujari Babar Banna
4	122000325	Fabeem Ud Din	Sakhi Mar Jan	Azam Danda Khel Sakhel Banna CNIC 11101- 51121717-5	68.09	66	134.09	GHS Bhanghi Khan Khujari

SST (General)

S. No	Roll No.	Name	F/Name	Address	Academic Marks(Out of 100)	NTS Marks (Out of 100)	Total marks (Out of 200)	Name of School
1	2942002960	Mehsin Shah	Hameed Ali Shah	CO DEO Male Banna CNIC 11101- 2845434-5	71.73	82	153.73	GMS Mirzali Gul Bafiq Landsak
2	124001036	Tabir Amin	Sharif Ullah Khan	CO DEO Male Banna CNIC 11101- 3294700-7	73.26	77	152.26	GHS Bati Kala Umertzai

Notice of the Contract Extension of SSTs (M) District Bannu

10.	121001012	Noor Zada	Mir Afzal Khan	Kander Khan Khel P.O Azim KHal Bannu CNIC No.11101-1688837-5	54.24	80	135.24	GGHS Landi Jalandar
11.	12100648	Kamran Ullah Khan	Gul Faraz Khan	Akhondan Tilar Khel bannu CNIC No.11101-29500427	68.08	66	134.08	GHS Mira Khel Bannu
12.	121000851	Zeeshan Khan	Rasta Baz Khan	Ganji Daud Shah P.O Pipal Bazar Bannu CNIC No.11101-6035136-3	68.99	64	132.99	GHS Mandan

SST (Maths-Physics)

Sr	Roll	Name	F/name	Address	Academic Marks (out of 100)	NTS Marks (out of 100)	Total marks (out of 100)	Name of school
1.	12200262	Farhan	Dost Muhammad Khan	Village PO Kachikot Abad Khan Bannu CNIC No.11101-7448891-9	56.95	88	144.95	GHS Dandi Wazir
2.	292001567	M. Sufyan Sadiq	Shah Niyaz Khan	Noormali P.O Jando Khel Bannu CNIC No.11101-9152291-3	78.51	60	138.51	GHSS Dilasa Khan Mandew
3.	122000452	Waseem Ullah Shah	Shanaraz Shah	Village PO Koti Sadat Bannu CNIC No.11101-4280916-3	78.31	56	134.31	GHS Khaujazi Babar Bannu
4.	122000325	Faheem Ud Din	Sakhi Mar Jan	Azam Danda Khel Sekhazi Bannu CNIC No.11101-51121717-5	68.09	66	154.09	GHSS Bhanghi Khan Khurjari

SST (General)

Sr	Roll	Name	F/name	Address	Academic Marks (out of 100)	NTS Marks (out of 100)	Total marks (out of 100)	Name of school
1.	2942002960	Mohin Shah	Hamzad Ali Shah	CO DEO Male Bannu CNIC No.11101-2845434-5	71.730	82	153.73	GMS Mirzali Gul Badin Landidak
2.	124001035	Tahir Amin	Sharif Ullah Khan	CO DEO Male Bannu CNIC No.11101-3294700-7	75.26	77	152.26	GHS Bati Kala Umerzaia



-10-

Notification Of the Contract Extension of SSTs (M) District Bannu 3

3	24000948	M. Anif Khan	Salih Ali Shah	CO DEO Male Bannu CNIC 11101-7823362-9	73.52	74	147.52	GHSS Hakim Harvid
4	124000792	Abdul Halim Khan	Mir-Dar Ali Gul Khan	CO DEO Male Bannu CNIC 11101-4038479-7	56.87	90	146.87	GHS No 2
5	124008636	Azhar Ali Khan	M Ali Khan	CO DEO Male Bannu CNIC 11101-6080158-3	54.51	91	145.51	GHS Naz Jafar
6	123001043	Kifayat Ullah Khan	Imbar Hussain Qureshi	CO DEO Male Bannu CNIC 11101-3588360-5	53.30	89	142.50	GHS Muna Khan Jami Ebel
7	123000514	Wajid Ali Khan	M Ferooz Khan	CO DEO Male Bannu CNIC 11101-3536179-3	65.27	77	142.27	GHS Amir Gafar Ghorba Baka Kbel
8	294003425	Hammad Ul Haq	Inayat Ullah Khan	CO DEO Male Bannu CNIC 11101-3562378-1	63.12	79	142.12	GHS Amir Gafar Ghorba Baka Kbel
9	293001970	Banaha m. Nawaz	Khoob Nawaz	CO DEO Male Bannu CNIC 11101-2670371-7	64.87	77	141.87	GHSS Baka Kbel
10	123001472	Ghazanvir Ullah Khan	Inam Ullah Khan	CO DEO Male Bannu CNIC 11101-9010413-7	60.76	81	141.76	GHSS Baka Kbel
11	123001181	Shahid Ullah Khan	Taj Wali Khan	CO DEO Male Bannu CNIC 11101-6635801-3	66.68	75	141.68	GHS No 2
12	123000933	Taseer Ahmad Khan	Sar Iqbal Khan	CO DEO Male Bannu CNIC 11101-0997970-7	48.50	93	141.50	GHSS Baka Kbel Shah
13	124001216	Abid Ali Khan	Ali Habibullah Khan	CO DEO Male Bannu CNIC 11101-6850832-5	53.54	87	140.54	GHS Wali Noor Jami Kbel 2

TERMS & CONDITIONS

1. The extension will not be in favour of those SSTs who have not taken over charge or have remained absent from duty or resigned from service.
2. Extension is purely on temporary & contract basis for one year with effect from 1st September, 2019 up to 31st September 2020.
3. Their services are liable to termination on one month's prior notice from either side. In case of resignation without notice, their one-month pay/allowances shall be forfeited to the Government.

Notice of the Contract Extension of SSTs (M) District Bannu

3.	24000941	M Asif Khan	Safdar Ali Shah	CO DEO Male Bannu CNIC No.11101-7825362-9	73.52	74	147.52	GHSS HGakim Havid
4.	12400792	Abdul Halim Khan	Mir Daz Ali Gul Khan	CO DEO Male Bannu CNIC No.11101-4038479-7	54.87	90	146.87	GHS No.2
5.	12400686	Aamir Ali Khan	M. Ali Khan	CO DEO Male Bannu CNIC.No.11101-6080388-5	54.51	91	145.51	GHS Nar Jafar
6.	123001043	Kifayat Ullah Khan	Iftikhar Hussain Qureshi	CO DEO Male Bannu CNIC No.11101-3588360-5	53.50	89	142.50	GHS Musa Khan Jani Khel
7.	12300514	Wajid Ali Khan	M. Farooq Khan	CO DEO Male Bannu CNIC No.11101-3536179-63	65.27	77	142.27	GHS Amir Gafar Ghorha Baka Khel
8.	29400425	Hamid Ul Haq	Inayat Ullah Khan	CO DEO Male Bannu CNIC No.11101-3662378-1	63.12	79	142.12	GJHS Amir Gafar GHorka Baka khel
9.	293001970	Ihtisham Nawaz	Khoob Nawar	CO DEO Male Bannu CNIC No.11101-2670871-7	64.17	77	141.87	GHSS Baka Khel
10.	123001472	Ikram Ullah Khan	Inam Ullah Khan	CO DEO Male Bannu CNIC No.11101-9010413-7	60.76	81	141.76	GHHSS Baka Khel
11.	123001181	Shahid Ullah Khan	Taj Wali Khan	CO DEO Male Bannu CNIC No.11101-6635801-3	66.68	75	141.68	GHS No:2
12.	123000933	Taseer Ahmad Khan	Sar Iqbal Khan	CO DEO Male Bannu CNIC No.11101-0997970-7	41.50	93	141.50	GHSS Baka Khel Shah
13.	124001216	Abid Ali Khan	Ali Bahadar	CO DEO Male Bannu CNIC No.11101-6850832-5	53.54	87	140.54	GHS Wali Noor Jani Khel 2

TERMS & CONDITIONS

1. The extension will not be in favour of these SSTs who have not taken over charge or have remained absent from duty or resigned from service.
2. Extension is purely on temporary and contract basis for one year with effect from 14th September 2019 upto 13th September 2020.
3. Their services are able to termination on the month's prior notice the site. Either side. In case of resignation without notice, their one month pay/allowancesforfeited to the government



-11-

Notification Of the Contract Extension of SSTs (M) District Bannu

4. They will be governed by such rules and regulations as may be issued from time to time by the Government.
5. Their services shall be terminated at any time, in case their performance is found unsatisfactory during their contract period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
6. Their appointments are made on School based. They will have to serve at the place of posting, and their services are not transferable to any other station.

(Hafiz Dr. Muhammad Ibrahim)

Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Encl. No. 353-60 / P.S. No. A-11/Vol-3/SST(M) Contract Extension

Dated Peshawar the 5/11/2019

Copy forwarded for information and necessary action to the:-

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

Deputy Director (Establishment)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Notification of the Contract Extension of SSTs (M) District Bannu

4. They will be governed by such rules and regulations as may be issued from time to time by the Government.
5. Their services shall be terminated at any time, in case their performance is found unsatisfactory during their contract period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
6. Their appointment are made on School based. They will have no at the place of posting, and their services are not transferable to any other station.

Sd/-
(Hafiz Dr. Muhammad Ibrahim)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst. No.5353-60/File No.A-14/Vol-3/SST (M) contract Extension

Dated Peshawar the 5/11/2019

Copy forwarded for information and necessary action to the

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Secretary Khyber Pakhtunkhwa Public Service Commission Peshawar,
3. District Education Officer (Male) Bannu.
4. District Accounts Officer Bannu.
5. PS to the Secretary to Govt. Khyber Pakhtunkhwa E&SE Department.
6. PA to the Director EASE Khyber Pakhtunkhwa Peshawar.

Sd/-
Deputy Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) BANNU - 12-

No. 10955 / ADEO Secy:

Dated 6/8/2022

"B"

To:

Mr. Syed Salman Hashmi SST
GHS No.2 Bannu

Subject: DISCIPLINARY PROCEEDING / CHARGE SHEET

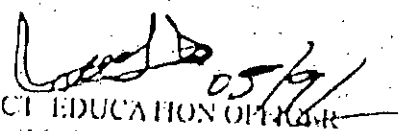
I Zahid Muhammad District Education Officer (Male) Bannu on behalf of competent authority hereby charge sheeted as follows:-

That you while posted as SST at GHS No.2 Bannu, committed the following irregularities:

- 1- You turned out to be rude and mis-conduct in your official duty.
- 2- That the Secretary E&S Edu: Department Khyber Pakhtunkhwa issued instructions to all Head of Institutions School staff for necessary cleanliness on 21-08-2022(Sunday)
- 3- That you have shared a statement against such instructions / High ups/Education Department on face book, which is against the rules and regulations and you have appeared to be guilty of misconduct.
- 4- That you have committed breach of aforesaid rules being a Govt. servant within the meaning of section 15 of Khyber Pakhtunkhwa Civil servant Act, 1973


Your all acts clear cut violations of the Govt. rules and you have appear to be guilty of misconduct under E&D Rules 2011 and you have rendered your self liable to all or any of the penalties specified in section-3 of the said rules.

You are therefore directed to submit you reply in writing to the undersigned with in three day, if you failed to submit your reply within stipulated time it will be presumed that have nothing to say in your defence and the case shall be decided exparte against you under E&D Rules 2011.


DISTRICT EDUCATION OFFICER
(MALE) BANNU

Encl: No. _____ / Dated as above.

Copy to:-
1- Director E&S Education Khyber Pakhtunkhwa
2- Deputy Commissioner Bannu.
3- Enquiry Officer.


DISTRICT EDUCATION OFFICER
(MALE) BANNU

-13-
-10-

The District Education Officer,
District Bannu.

Subject: Response to your Charge Sheet (No. 10955)

Respected Sir,

With utmost respect, it is stated that that I received a letter (No. 10955) dated 06/09/2022 from your office. In the said letter, your good self has pointed out that I was found rude during my official duty. With due respect sir, I have not met you in person, nor spoke to you in any capacity thus far. In the light of aforementioned facts, it is a bit saddening and astonishing to know that you have adjudged me rude. With due respect, I feel like you might have mistaken me for somebody else. I have never been rude to you, or any other officer: both in office and at my school. I am pretty sure that whenever we meet in person, you would realize for a fact that this allegation is just some misunderstanding.

Secondly, regarding the allegation of sharing a statement against the competent authority, I shared certain views regarding the cleanliness drive. I would like to inform your good self that I personally have no issue with teachers volunteering for maintaining cleanliness at educational institutes, or giving a helping hand in maintaining cleanliness at school. In fact, I am in charge of the science lab, at our school and I personally take care of its cleanliness. So, being against cleanliness in general is not something that I opined. I had concerns over the perception which existed among people that somehow, teachers are responsible for the maintenance of school's cleanliness and that the dismal condition of schools cleanliness was fault of the teachers. In order to avoid my thoughts and words being taken out of context and out of proportion, I already deleted the said post a couple of weeks ago which you may already have noticed. However, since the competent authority has still deemed my thoughts, or the wording used as inappropriate, I would wholeheartedly apologize for any, or every word that did not bode well with the competent authority.

Sincerely yours,
Syed Salman Hashmi,
SST (Bio/Chem),
GHS No. 2, Bannu.



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

Phone: 091-9225344

Email: establishemntmale1@gmail.com

OFFICE ORDER

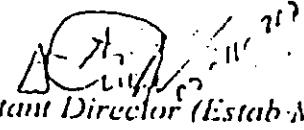
Consequent upon the report of DEO (M) Bannu vide letter No. 12540 dated 22-09-2022 and approval of the Competent Authority, the contract based order of this office bearing No. 569-75 dated 14-09-2018, the services of Mr. Syed Salman Hashmi SST (B/C) GHS No.2 Bannu, adhoc appointee, is hereby discontinued under section (11) (i) (iii) of the Khyber Pakhtunkhwa Civil Servants ACT 1973.

**DIRECTOR
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar**

Undt No. 5638-110 P.No. 1 SST (M) Disciplinary Action Dated 02/21/2022

Copy of the above is to the:-

1. District Education Officer (M) Bannu
2. District Accounts Officer Bannu.
3. Principal GHS No.2 Bannu.
4. Mr. Syed Salman Hashmi SST (B/C) GHS No.2 Bannu.
5. P.A to Director (E&SE) Khyber Pakhtunkhwa, Peshawar.
6. Master File.


**Assistant Director (Estab M-1)
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar**

-15- "D"
-12-

The Secretary,
E&SE, KP.

Subject: Appeal against the decision of discontinuation of service vide Office Order (Endst. No. 5638-40)

Respected Sir,

It is stated with utmost respect that I was appointed as SST Bio/Chem (BPS-16) in E&SE department through NTS (National Testing Service) vide notification no. 569-75 dated September 14th, 2018 and my service was extended vide notification no. 5353-60 dated November 5th, 2019. Since my appointment, I have performed my duties to the fullest and have been available for my students and school administration even after my official duty hours. My school staff, Vice Principal and Principal will bear witness to my dedication and innovative ways of teaching. I am among the most punctual teachers of our school and have always accepted extra responsibilities as a challenge and lived up to the expectations of the school administration and the school staff. During my entire service, no one won't find a single report where our Principal or other staff members have shown displeasure over my attitude or the way I carry out my official responsibilities at the school.

Recently, dated September 6th, 2022, I received a notice (No. 10935) from the office of DEO (M) Bannu, the copy of which is attached herein. As per the notice, I was directed to submit my reply in writing within three days. As per the direction of the officer concerned, I wrote a detailed reply clarifying my position over the allegations made in the notice that was served to me. I duly apologized to the competent authority over any action of mine that did not bode well with the officer concerned in particular and the E&SE department as a whole. I even met DIO (M) Bannu in person and explained my position and informed him that the messages being conveyed to him about my rude and arrogant behavior during my official duty were totally baseless.

After all of my clarifications, explanations and justifications, both verbally and in written, dated November 10th, 2022, our school received an office order (Endst. No. 5638-40) according to which, my contract based order bearing No. 569-75 dated September 14th, 2018 was discontinued. In other words, my 4 years' service at E&SE department has been terminated without even a proper inquiry. This came as a great shock to me because in my reply to notice given to me by the DIO (M) Bannu (copy attached herein), I clearly mentioned that the first allegation is completely baseless. As for the second misconduct, I already informed the competent authority that the face book post in question was already deleted, even before the notice was given to me. I have nothing but respect for my high ups. Even after the termination, I do not hold any personal grudge towards respected DIO (M) Bannu and consider him as my elder, both in terms of age and designation. Same goes for any other official of E&SE department.

Taking the following facts into consideration, the decision of termination from service seems extremely harsh, especially when the notification of regularization is expected in next few days. It is therefore a humble request to kindly reverse the decision of discontinuation of my service and declare the office order (Endst. No. 5638-40) null and void on humanitarian grounds so that I can continue my service with the same zeal and zest as I always have, throughout my entire period, serving as a teacher. I am sure that your good self will take into consideration that during my entire four year service, this is the first and the only complaint against me.

Thanking in anticipation and looking forward to your due consideration and a fair, just and speedy decision.

1381
14/11/22

Sincerely yours,
Syed Salman Hashmi,
SST (Bio/Chem)
GHS No.2, Bannu.

The Secretary,
E&SE, KP.

Subject: Appeal against the decision of discontinuation of service vide Office Order (Endst. No. 5638-40)

Respected Sir,

It is stated with utmost respect that I was appointed as SST Bio/Chem (BPS-16) in E&SE department through NTS (National Testing Service) vide notification no.569-75 dated September 14th, 2018 and my service was extended vide notification no. 5353-60 dated November 5th, 2019. Since my appointment, I have performed my duties to the fullest and have been available for my students and school administration even after my official duty hours. My school staff, Vice Principal and Principal will bear witness to my dedication and innovative ways of teaching. I am among the most punctual teachers of our school and have always accepted extra responsibilities as a challenge and lived up to the expectations of the school administration and the school staff. During my entire service, no one won't find a single report where our Principal or other staff members have shown displeasure over my attitude or the way I carry out my official responsibilities at the school.

Recently, dated September 6th, 2022, I received a notice (No. 10955) from the office of DEO (M) Bannu, the copy of which is attached herein. As per the notice, I was directed to submit my reply in writing within three days. As per the direction of the officer concerned, I wrote a detailed reply clarifying my position over the allegations made in the notice that was served to me. I duly apologized to the competent authority over any action of mine that did not bode well with the officer concerned in particular and the E&SE department as a whole. I even met DEO (M) Bannu in person and explained my position and informed him that the messages being conveyed to him about my rude and arrogant behavior during my official duty were totally baseless.

After all of my clarifications, explanations and justifications, both verbally and in written, dated November 10th, 2022, our school received an office order (Endst. No 5638-40) according to which, my contract based order bearing No. 569-75 dated September 14th, 2018 was discontinued. In other words, my 4 years' service at E&SE department has been terminated without even a proper inquiry. This came as a great shock to me because in my reply to notice given to me by the DEO (M) Bannu (copy attached herein), I clearly mentioned that the first allegation is completely baseless. As for the second misconduct, I already informed the competent authority that the face book post in question was already deleted, even before the notice was given to me. I have nothing but respect for my high ups. Even after the termination, I do not hold any personal grudge towards respected DEO (M) Bannu and consider him as my elder, both in terms of age and designation. Same goes for any other official of E&SE department.

Taking the following facts into consideration, the decision of termination from service seems extremely harsh, especially when the notification of regularization is expected in next few days. It is therefore a humble request to kindly reverse the decision of discontinuation of my service and declare the office order (Endst. No 5638-40) null and void on humanitarian grounds so that I can continue my services with the same zeal and zest as I always have, throughout my entire period, serving as a teacher. I am sure that your good self will take into consideration that during my entire four year service, this is the first and the only complaint against me.

Thanking in anticipation and looking forward to your due consideration and a fair, just and speedy decision.

Sincerely yours,
Syed Salman Hashmi,
SST (Bio/Chem)
GHS No.2, Bannu.



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
 Block "A" Opposite M PA's Hostel, Civil Secretariat Peshawar
 Phone No. 091-9223587

13
16-

NOTIFICATION

Dated Peshawar the 16th February 2023

No. SO (PE)/5-1/Gen-Misc/Syed Salman Hashmi SST BIO /Chem Bannu:-

WHEREAS, Syed Salman Hashmi, was initially appointed as SST Bio/Chem (BS-16) on 14-09-2018. The DEO Male Bannu issued him Charge Sheet on account of the following allegations. "That he turned out to be rude and shows misconduct in his official duty and secondly that Secretary E&SED issued the instruction to all heads of institutions/ School Staff for necessary cleanliness on 21-08-2022 (Sunday). He shared a statement against such instructions/high Ups of the Education Department on Facebook which is against the rules and regulations and has appeared to be guilty of miss conduct".

2. AND, WHEREAS, the appellant submitted a reply to the charge sheet and the DEO concerned reported the matter to the Directorate of E&SE Khyber Pakhtunkhwa The Director E&SE, Khyber Pakhtunkhwa; discontinued the contract ad-hoc appointment Endst. No.569-75 dated 14-09-2018, in respect of Syed Salman Hashmi, SST(B/C) GHS, No-2 Bannu, under Section (11)(1)(iii) of the Khyber Pakhtunkhwa Civil Servant Act, 1973 vide endst. No. 5638-40 dated 02-11-2022.

3. AND, WHEREAS, the aggrieved employee filed an appeal before the Appellant Authority i.e Secretary E&SE Department Khyber Pakhtunkhwa. The Department offered the opportunity of a personal hearing to the appellant and he appeared before the Committee chaired by Additional Secretary (Establishment) E&SE Department. After going through the record available on file, the report of the District Education Officer concerned and Directorate of E&SE, the appellant could not justify his stance, but tendered unconditional written apology on affidavit Stamp paper that he shall never use Social Media illegally against the Department, Provincial and Federal Government.

4. AND, WHEREAS, the aggrieved employee filed appeal before the Appellant Authority i.e Secretary E&SE Department Khyber Pakhtunkhwa. The Department offered him an opportunity for personal hearing and appeared before the Committee chaired by Additional Secretary (Establishment) E&SE Department. After going through the record available on file, and report of the District Education Officer concerned & Directorate E&SE the appellant could not justify his stance, but tendered unconditional written apology on an affidavit Stamp paper that he shall never use Social Media illegally against the Department, Provincial and Federal Governments. Further he shall obey all rules and regulations.

5. NOW, THEREFORE, in view of the relevant records, personal hearing unconditional written apology submitted by the appellant and discussion with all concerned including representative of the Directorate of the Elementary & Secondary Education Khyber Pakhtunkhwa and DEO (M) Bannu the instant appeal is allowed and office order Endst No. 5638-40/F-No. 1/SST(M) Disciplinary action dated 2.11.2022 issued by the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa is set aside. Furthermore, one year annual increment is stopped and intervening period from the date of withdrawal of his contract appointment order to the date of restoration of his contract appointment will be conceder as leave without pay.

---Sd---
SECRETARY
E&SE TO GOVT: OF KP.



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block "A" Opposite M PA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9223587

Endst: No & date even:

-17- -19-

Copy forwarded to:

1. The Accountant General, Khyber Pakhtunkhwa Peshawar.
2. The Director, Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar.
3. The District Education Officer (M), Bannu.
4. The District Accounts Officer, Bannu.
5. Syed Salman Hashmi, SST BIO/Chem (BS-16), GHS, No-2 Bannu.

(MUHAMMAD ISHAQ)
SECTION OFFICER (PRIMARY)

16/7/23



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION

KHYBER PAKHTUNKHWA PESHAWAR.

"E"

-18-

NOTIFICATION

1. **WHEREAS**, Mr. Syed Sulman Hashmi was appointed as SST (Bio/Chemistry) at GHS No.2 District Bannu vide Notification No. 569-75 Dated: 14-09-2018, on contract/adhoc basis.
2. **AND WHEREAS**, the District Education Officer (Male) Bannu issued him Charge Sheet on account of the allegations i.e. misconduct in his official duty and misuse of Social Media/Facebook against high ups of the Education Department.
3. **AND WHEREAS**, the contract based appointment order in r/o Mr. Syed Sulman Hashmi was discontinued by this office vide order No. 5638-40 Dated: 02-11-2022 under Section (11X1)(iii) of the Khyber Pakhtunkhwa Civil Servant Act, 1973.
4. **AND WHEREAS**, being aggrieved, he submitted an appeal to the Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar, for restoration of his appointment order.
5. **AND WHEREAS**, the Secretary, E&SED Khyber Pakhtunkhwa, Peshawar, accepted the appeal under the Rule 17(2)(c) of the Khyber Pakhtunkhwa Efficiency & Disciplinary Rules-2011, and restored contract based appointment order, by setting aside this office order No. 5638-40 dated 02-11-2022. Furthermore, one year annual increment was stopped and intervening period from the date of withdrawal of his contract appointment order to the date of restoration of his contract appointment was treated as leave without pay (EOL).
6. **AND WHEREAS**, DEO (Male) Bannu forwarded a letter vide No. 4635 Dated: 12-04-2023, along with self-explanatory appeal in r/o Mr. Syed Salman Hashmi SST (Bio/Chem) GHS No.2 Bannu for his regularization.

NOW THEREFORE, in exercise of powers conferred upon the Director (Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar), being Competent Authority, after examining the evidence available on record, is pleased to regularize his services in Teaching Cadre, in continuation of this office Notification bearing Endst: No. 4062-66 Dated: 01-12-2022, under the provision of the Khyber Pakhtunkhwa, Teachers (Appointment and Regularization of Services) Act, 2022 (Khyber Pakhtunkhwa, Act No.XLI of 2022), under Terms and Conditions given below, in the best interest of public.

2018 SST Bio/Chem										
S.#	Roll #	Name of SST	Father Name	CNIC	D.O.B	Total Marks	School	Adv.No. and Date	Appl Order No and Date	Extension Order No. and Date
1.	121000965	Mr. Syed Salman Hashmi	Mr. Syed Nadeem Hashmi	11101-7372987-3	21-04-1992	135.9	GHS No.2 District Bannu	INF(P) 6749 Dated: 28-11-2017	569-75 Dated: 14-09-2018	No. 5353-60 Dated: 05-11-2019

Terms and Conditions: -

1. His service shall be governed by the Khyber Pakhtunkhwa Civil Servant Act, 1973, the Khyber Pakhtunkhwa (Appointment, Deputation, Posting and Transfer of Teachers, Lecturers, Instructor and Doctors) Regularity

His service will be considered regular and he shall be eligible for pension/deduction of GP Fund in term of Khyber Pakhtunkhwa Civil Servant Act, 1973, as amended in 2013, however, the teacher appointed on or after 07/06/2022 shall be dealt with Section (2)(2) of the Khyber Pakhtunkhwa (Amendment) Act, 2022.

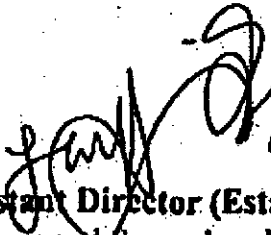
3. His service is liable to termination on one-month notice from either side. In case of resignation without notice, his one month pay/allowances shall be forfeited to the Government.
4. He shall possess the same qualification and experience required for the subject post on regular basis as specified in Section (3) (a) of the Act *ibid*.
5. His regularization shall not affect the service promotion quota of all service cadres as specified in Section (3) (c) of the Act *ibid*.
6. He shall be entitled for seniority and pay from the date of initial appointment on Adhoc/Contract basis as specified in Section (3) (d) of the Act *ibid*.
7. He shall perform duty for at least three years from the date of taking over charge where he was appointed/posted initially.
8. The regularization shall not be in favor of those teachers who have not taken over charge, remained absent from duty and resigned from service.
9. The Teacher, Regularized through this notification, shall be confirmed after successful completion of In-service mandatory training as specified in their Service Rules notified vide notification No. SO (PE) 4-5/SSRC/Meeting/2012/Teaching Cadre/2017 dated 07/03/2018 within two consecutive attempts otherwise his appointment order shall be considered as withdrawn/cancelled from the date of declaration of result of the second attempt made in the induction program.
10. DEO concerned is directed to check/verify the documents/Extension orders etc. of the regularized teacher once again with the criteria mentioned for regularization. If the teacher doesn't meet the criteria, his service shall be considered as ceased.

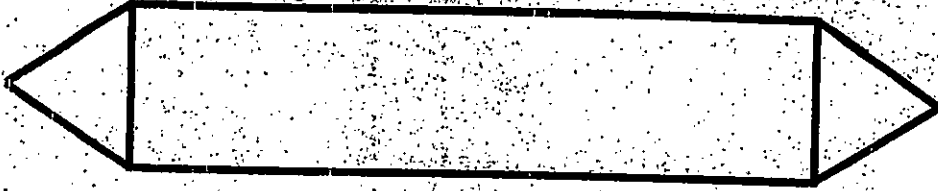
Director
Elementary and Secondary Education
Khyber Pakhtunkhwa, Peshawar

Endst: No. 2522-23 /File No./B-1/SST (M)/Regularization/2018-22/Bannu Dated Peshawar the 22/6/2023.

Copy forwarded for information and necessary action to the: -

1. District Education Officer (M) Bannu.
2. District Accounts Officer Bannu.
3. Teacher Concerned.
4. Principal Concerned.
5. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
6. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
7. Master File.


Assistant Director (Estab-1)
Elementary and Secondary Education
Khyber Pakhtunkhwa, Peshawar
22/6/2023



31 دسمبر 2014ء 2 منجانب سائو

سید سلمان شاہی بنام گورنمنٹ

مورخہ

مقدمہ

دعویٰ

جرم

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ

آن مقام کیلئے ولڈرڈن + کامران خان + محرم حق

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 ق تقرر ثالث و فیصلہ پر حلف دیے جواب دہی اور اقبال دعویٰ اور

بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق

زرایں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی

اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا محتاج 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 مذکور با اختیار حاصل ہوں گے

اور اس کا ساختہ پر داختم منظور قبول ہوگا دوران مقدمہ میں جو خرچہ ہر خانہ التوائے مقدمہ ہوں گے

سب 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 لکھ دیا کہ سندر ہے۔

Accepted

20

ماہ

المرقوم

العبد گواہ العبد

بھور