

**BEFORE THE KHYBER PUKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

*Ameretel*

**Service Appeal No. 1270/2023**

Inayat Ullah S/O Muhammad Dildar R/O Village Takhta Band Tehsil Gagra District Buner

**(APPELANT)**

**Versus**

1. District Education Officer Male District Buner
2. Sub Divisional Educational Officer (M) Tehsil Chagharzi District Buner
3. Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
4. Secretary, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
5. District Account Officer Buner at Daggar.

**(RESPONDENTS)**

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**DEPONENT**

CNIC No 15101-0882586-3

(1)

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Khyber Pakhtunkhwa  
Service Tribunal  
Diary No. 6922  
Date 08/08/23

(RESPONDENTS)

Written Reply/Para wise Comments for & on behalf of Respondents No. 1, 2, 3, 4 & 5.

**Preliminary Objections**

1. ***That the instant appeal is wholly incompetent as the remedy of departmental appeal is available to the appellant, which he has filed before the appellate Authority (Director) on 27/6/2023, however, the mandatory period of 90 days has not yet expired and he has filed the instant service appeal, without waiting for reply of the appellate authority or expiry of the mandatory period, due to which this appeal is incompetent and suffers legal infirmity.***
2. That according to the judgment of the honorable Khyber Pakhtunkhwa Service tribunal in Service Appeal No. 1678/2022, the instant appeal is not maintainable.
3. That the appellant has no vested right to continue or hold a particular post at a particular place, thus, is liable to be transferred anywhere in exigencies of service, hence the suit is not maintainable.
4. The Appellant has no cause of action/locus standi to file the instant declaration of right.
5. The Appellant has concealed the material facts from this honorable court, hence liable to be dismissed.
6. That the appeal is wholly incompetent, misconceived and untenable.
7. That the appeal for declaration is wrong, baseless and not maintainable, it shows no strong cause to be taken for adjudication, therefore, the same is liable to be rejected/ dismissed.
8. That the instant appeal is unjustifiable, baseless, false, frivolous and vexatious. Hence the same is liable to be dismissed with the order of special compensatory cost in favor of respondent.

- 9. That the instant appeal is not maintainable in the present form and also in the present circumstances of the issue.
- 10. The Appellant has not come to this honorable court with clean hands.
- 11. The Appellant has filed the instant appeal just to pressurize the respondents.
- 12. The appellant has filed the instant appeal on mala-fide motives.
- 13. The instant litigation is against the prevailing law and rules.
- 14. The appellant has been estopped by his conduct to file the appeal.
- 15. That every Government servant is bound to perform his duties anywhere in the best interest of public service.

**FACTS**

- 1. Pertains to the record.
- 2. Incorrect and hence denied. The post of SPST, BPS-14, is a district cadre post and not a union council-based post. Under the **Khyber Pakhtunkhwa Appointment, Deputation, Posting and transfer of teachers, Lecturers, Instructors and Doctors Regulatory Act 2011 (KP Act No. XII of 2011)**, only PST, BPS-12, is a union council-based post, which cannot be transferred out from his/ her union council while SPST BSP-14 and PSHT BPS-15 are district cadre posts. They can be posted anywhere in the district. Thus, the appellant, under the said act, has no right to claim his posting within his own union council. However, the information given in this para of the appeal is five years back history/record of his leave and adjustment which has no relevancy with the instant case, hence, the para is unrelated and it is just added for the purpose to complicate and intricate the case in order to obscure the facts under the shadow of irrelevant history/record.
- 3. Pertains to record.
- 4. Incorrect and hence denied. As explained in para 2 of the facts, the post of SPST BPS-14, is a district cadre post and not a union council-based post. Under section 3 of the **Khyber Pakhtunkhwa Appointment, Deputation, Posting and transfer of teachers, Lecturers, Instructors and Doctors Regulatory Act 2011 (KP Act No. XII of 2011)**, only PST, BPS-12, is a union council-based post, which cannot be transferred out from his/ her union council. On the other hand, the appellant is an SPST Teacher in BPS-14, which is a district cadre posts. He can be posted anywhere in the district. Thus, the appellant, under the said act, has no right to claim his posting within his own union council.

The adjustment order in respect of the appellant is legal and lawful. As per **rule-28 of the Khyber Pakhtunkhwa, Civil Servants Revised Leave Rules, 1981**, which reads as follow:

**28. Assumption of Charge on return from leave etc.--- (1) A civil servant, on return from leave, shall report for duty to the authority that sanctioned his leave and assume charge of the post of which he is directed by that authority unless such direction has been given to him in advance.**

**(2) In case he is directed to take charge of a post at a station other than that from where he proceeded on leave, travel expenses as on travel shall be payable to him. (Civil Servants Revised Leave Rules 1981 are attached as Annexure "A")**

In addition, the Competent Authority can transfer/adjust a civil servant serving in Elementary & Secondary Education Department anywhere against a vacant post within his cadre, post and district. Civil servant could not stay at a place of his choice unless operation of transfer order stayed, which is not the position in the case. Such view of the issue, according to the Service Tribunal, if affirmed, would give license to every Civil Servant to file a representation against order of transfer and stay at place from which he did not want to move, as such the same would create administrative chaos. **Same is reported in 2006 SCMR 443.** Similarly, Civil Servant could not disobey transfer order. **Same is reported in 2003 PLC (CS)104.** Employees are liable to be transferred anywhere in exigencies of service, having no vested right of his choice for a specific place. **Reliance is placed on 1998 SCMR 293.**

Furthermore, the adjustment order in respect of the appellant has no legal infirmity, and is, therefore, complete in all respects. His post is a district cadre post and he is required to serve anywhere in the district where the competent authority adjusts/transfers him in the public interest.

**Section-10 of Civil Servants Act, 1973** provides sufficient clearance regarding posting and transfer which reads as follow:

***"Posting and transfer: - Every civil servant shall be liable to serve anywhere within or outside Pakistan, in any equivalent or higher post under the Federal Government, or any Provincial Government, or local authority, or a corporation or body set up or established by any such Government."***

- 5. Pertains to record.
- 6. Pertains to the record. However, the para is completely irrelevant and has nothing to do with the instant case, and the same is just added for making the case intricate for purposeful evasion from facts and real history of the case.
- 7. Pertains to the record. The appellant was on leave w.e.f 01-03-2022 to 20-12-2022 while he submitted application for transfer on 07-12-2022 during his leave period. As per rules, transfer of an employee cannot be made during leave period. It is evident from his application dated 07-12-2022 that leave of the appellant has not yet expired. He was required to submit his arrival report to the Competent Authority for proper adjustment against a vacant SPST post, which he didn't and remained absent till he was adjusted at GPS Gujar Abad on the report/letter of SDEO concerned. **(Sanction of E. O. L. without pay, transfer application of the appellant and SDEO letter are attached as annexures "B", "C" and "D")**
- 8. Incorrect and hence denied. After completion of E. O. L without pay of 9 months and 20 days of the appellant, the appellant neither informed the concerned SDEO nor this office for his adjustment against a vacant post, and remained absent w. e. f

21-12-2022 till the adjustment at GPS Gujar Abad. And, reportedly, he adjusted himself in a certain school without informing the DEO and proper order/ approval of the Respondent No.1, thereby, exercising the authority of the undersigned, which is utter violation of rules and regulations. In this regard, a show cause was served upon him on 20-02-2023. **(The show cause is attached as Annexure "E")**

However, on the report of the concerned SDEO, the respondent department adjusted the appellant at GPS Gujar Abad against a vacant SPST, BPS-14 post. **(The adjustment of the appellant at GPS Gujar Abad is attached as Annexure "F")**

9. Incorrect and hence denied. The appellant has not been transferred to GPS Gujar Abad rather he was adjusted after completion of his E. O. L. The appellant has not only committed non-compliance of official order but has also remained absent after his adjustment. Furthermore, it is clarified that he is an SPST teacher in BPS-14, which is a district cadre post and not a union council based, therefore, his claim that he was adjusted out of his union council is the result of speculations and conjectures.

10. Incorrect and hence denied. The adjustment order of the appellant after expiry of his E.O.L is in accordance with rules and regulations, hence, the same is legal and valid.

11. Incorrect and hence denied. The impugned adjustment order has already been communicated to the appellant through post as well as official WhatsApp groups. However, he did not comply with the adjustment order and wanted to adjust him at the place of his choice, wish and whim. Upon non-compliance, he was served with a show cause notice vide No. 873-77 dated 20-02-2023, the reply of which was submitted by the appellant on 02-03-2023. In the light of his reply to the show cause notice, he was called for personal hearing on 20-03-2023 for which he appeared on the same date before Dy. DEO as an authorized officer. During the personal hearing, he submitted his reply to questions asked by the authorized officer. In the light of above facts, it is without any doubt that he has not only received his adjustment order at GPS Gujar Abad but was also well aware of his adjustment order, which he accepted in his replies to the questions asked during personal hearing and in show cause notice. Thus the denial of appellant about receiving the impugned order is ludicrous and out of place, hence, the same is not convincing. **(Replies of both show cause notices and personal hearing are attached as annexure "G" and "H")**

12. Incorrect and hence denied. Already explained in para 8. It is further added that the appellant, in violation of rules and without any proper adjustment order, after expiry of his leave started going to the school of his choice, wish and whim and he remained absent from the school where he was properly adjusted vide proper notification of the Respondent No. 1.

13. Incorrect and hence denied. The para is irrelevant, and the same has been added by the appellant's counsel just to complicate the issue of simple adjustment after

expiry of his leave. In the instant case, the appellant had not only refused to obey the order of the Competent Authority, Respondent No. 1, by not assuming the charge at the new station for quite long time but also presented himself as undisciplined official.

14. Correct that the appellant has submitted reply to the show cause notice, which was about absence, misconduct and non-compliance of adjustment order. After fulfilling all codal formalities, he was awarded major penalty of reduction to lower post and scale. **In this para the appellant rebutted his own claim made in para 11 of not receiving his adjustment order.**

15. Incorrect and hence denied. Appeal against his adjustment order 17-02-2023 is infructuous as the appellant has already been proceeded and penalized after proper proceedings under E&D Rules 2011. Resultantly, he was adjusted at GPS Baishpur which is situated in the union council of his domicile

16. Pertains to the record.

17. Incorrect and hence denied. The adjustment order of the appellant has been modified after imposing penalty upon him. Both penalty and subsequent adjustment at GPS Baishpur have got finality. It is further averred that the order of imposing penalty is in accordance with rules.

18. Incorrect and hence denied. Section 3 of **The Khyber Pakhtunkhwa Appointment, Deputation, Posting and transfer of teachers, Lecturers, Instructors and Doctors Regulatory Act 2011 (KP Act No. XII of 2011)**, deals with the post of Primary School Teachers (PST) only, while the appellant was an SPST, BPS-14, hence, the reference given by the appellant is wrong and unlawful. In addition, no SPST vacant post is available at GPS Sawari and GPS No.2 Rega, hence, the appellant cannot be adjusted there. Furthermore, as per rules, an employee does not have vested right to claim for adjustment at a specific school of his choice. He is liable to serve anywhere within his district, post and cadre in the public interest.

19. Incorrect and hence denied. Already explained in the preceding para.

20. Incorrect and hence denied. The appellant was illegally sitting at GPS Alagram after expiry of his leave. It is further submitted that he had been adjusted at GPS Gujar Abad after expiry of his leave, where he did not take over charge and remained absent, being non-compliant with the official order/adjustment. The SDEO concerned reported him absent vide his office letter No. 2114 dated 15-04-2023. Due to his absence, his salary was stopped and he was issued with a show cause notice, which after proper procedure culminated in his reduction to lower post and scale. **(SDEO report and Final adjustment order is attached as annexure "I" and "J")**

21. Incorrect and hence denied. The proceedings against the appellant were already in the pipeline before filing his service appeal. Notice of the Honorable Court was received by this office on 26-06-2023 for reply while the proceedings against the appellant had already been completed and Notification No. 2590-96 dated 31-05-

2023 was issued on the very same date. It is also affirmed that the same notification has not been issued in back date and the issuance of notification is not possible in back date. The same facts can easily be verified from dispatch register. The numbers and dates in dispatch register are continuous before and after the same notification. If it was issued in back date, the signs of discontinuity, incoherency and tampering would have been evident in the dispatch register, which is not in the instant case and the numbering and date in the dispatch register are accurate and intact. **(Notice of the court, & Copies of dispatch register are attached as annexure "K", and "L" )**

22. Incorrect and hence denied. After he was adjusted at his own U.C at GPS Baishpur in the light of proceedings, he did not take over charge there and remained willfully absent. This office under rule-9 of the E&D Rules 2011 issued him absence notice No.3046 dated 26-06-2023 on his home address, which he has received, to which he was bound to give reply which he did not and remained willfully absent. Even if he received it later, he should comply at that time, however, he turned a deaf ears and did not comply with the office order and remained absent.

23. Pertains to record.

24. Pertains to record of the Honorable Court.

Furthermore, the appeal is not justified and accordance with rules and policy, therefore, the instant service appeal may be set aside on the following grounds:

**GROUND:**

A. Incorrect hence strongly denied. The mentioned adjustment order has been made in accordance with the law, rules and policy. There is no legal infirmity. As per **rule-28 of the Khyber Pakhtunkhwa, Civil Servants Revised Leave Rules, 1981**, which reads as follow:

**28. Assumption of Charge on return from leave etc.--- (1) A civil servant, on return from leave, shall report for duty to the authority that sanctioned his leave and assume charge of the post of which he is directed by that authority unless such direction has been given to him in advance.**

**(2) In case he is directed to take charge of a post at a station other than that from where he proceeded on leave, travel expenses as on travel shall be payable to him.**

Furthermore, Section 10 of the Civil Servants Act 1973 provides sufficient clearance regarding posting and transfer which reads as follows:

**"Posting and transfer: - Every civil servant shall be liable to serve anywhere within or outside Pakistan, in any equivalent or higher post under the Federal Government, or any Provincial Government, or local authority, or a corporation or body set up or established by any such Government."**

B. Incorrect and hence denied. Section 3 of The Khyber Pakhtunkhwa Appointment, Deputation, Posting and transfer of teachers, Lecturers,

Instructors and Doctors Regulatory Act 2011 (KP Act No. XII of 2011), deals with the post of PST only while the appellant is an SPST, BPS-14, hence, the reference given by the appellant is wrong and unlawful. His adjustment was lawful, however, the same has already been modified, as explained in para 1 of Preliminary Objections and paras 11, 14 and 15 of the Facts, hence, the present appeal is infructuous.

- C. Incorrect and hence denied. The Respondent No.1 acts as per rules and policy. No discrimination has been made with the appellant. Rather the appellant has violated the rules regulations and crushed legal official order of his adjustment under his feet, thereby, rendered himself to be guilty of absence, inefficiency and misconduct.
- D. Incorrect and hence denied. Already explained in para 8 of the Facts.
- E. Incorrect and hence denied. Already explained in para 11 of the Facts.
- F. Incorrect and hence denied. The para is irrelevant, and the same has been added by the appellant's counsel just to complicate the issue of simple adjustment after expiry of his leave. The appellant is narrating story of the past which has no relevance with the instant appeal. In the instant case, the appellant had not only refused to obey the order of the Competent Authority, Respondent No. 1, by not assuming the charge at the new school for quite long time but also presented himself as undisciplined official.
- G. Incorrect and hence denied. Already explained in para 18 of the Facts.
- H. Incorrect and hence denied. Already explained in para 20 of the Facts.
- I. Incorrect and hence denied. Already explained in para 20 of the Facts.
- J. Incorrect and hence denied. As already explained in para 21 of the Facts that the proceedings against the appellant were already in pipeline before filing of his service appeal. Notice of the Honorable Court was received by this office on 26-06-2023 for reply while the proceedings against the appellant had already been completed and Notification No. 2590-96 dated 31-05-2023 was issued on the very same date.
- K. Incorrect and hence denied. As explained in para 21 of the Facts.
- L. Incorrect and hence denied. The para is unrelated and irrelevant to the present case.
- M. Incorrect and hence denied. The para is unrelated and irrelevant to the present case.
- N. Incorrect and hence denied. The appellant was awarded penalty for his absence, inefficiency and misconduct collaborated with blatant use of social media for defamatory posts against his officers.

The respondents also seek permission of this Honourable Court to rely on additional grounds at the time of arguments.



In view of the above noted submissions, it is humbly requested that this Honourable Court may very graciously be pleased to dismiss the instant suit with cost in favour of the respondent.

SDEO (M) Chagarzi  
Buner

District Education Officer (M)  
Buner

Director  
Elementary & Secondary Education  
Peshawar

Secretary  
Elementary & Secondary Education  
Peshawar

District Accounts Officer Buner

**BEFORE THE KHYBER PUKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

*Amended*

**Service Appeal No. 1270/2023**

Inayat Ullah S/O Muhammad Dildar R/O Village Takhta Band Tehsil Gagra District Buner

**(APPELLANT)**

**Versus**

1. District Education Officer Male District Buner
2. Sub Divisional Educational Officer (M) Tehsil Chagharzi District Buner
3. Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
4. Secretary, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
5. District Account Officer Buner at Daggar.

**(RESPONDENTS)**

**AFFIDAVIT**

I, Ubaid ur Rahman, Superintendent BPS-17, office of the District Education (Male) Buner, do hereby solemnly affirms and state on oath that the whole contents of the reply are true and correct to the best of my knowledge and belief & nothing has been concealed from this Hon'ble Tribunal.

*It is further stated on oath that in this appeal the answering Respondents have neither been placed nor their defense has been struck off/cost-  
departie*

Deponent

15101-0882586-3

1 Annexure "A"

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## <sup>1</sup>[Khyber Pakhtunkhwa] Civil Servants Revised Leave Rules, 1981

No. FD. SO (SR-IV) 5-54 / 80 (Vol:II) dated 17-12-1981.---In exercise of the powers conferred by section 26 of the <sup>2</sup>[Khyber Pakhtunkhwa] Civil Servants Act, 1973 (<sup>3</sup>[Khyber Pakhtunkhwa] Act XVIII of 1973) and in supersession of this Department's Notification No. FD.SO(SR-IV) 1-17/78, dated the 20<sup>th</sup> November, 1979, the Governor of the <sup>4</sup>[Khyber Pakhtunkhwa] is pleased to make the following rules namely:--

**1. Short title, commencement and application.**---(1) These rules may be called the <sup>5</sup>[Khyber Pakhtunkhwa] Civil Servants Revised Leave Rules, 1981.

(2) They shall come into force at once.

(3) They shall apply to all Civil Servants under the rule making authority of the Governor except those who opted not to be governed by the <sup>6</sup>[Khyber Pakhtunkhwa] Civil Servants Leave Rules, 1979.

**2. Admissibility of Leave of Civil Servant.**---Leave shall be applied for, expressed and sanctioned in terms of days and shall be admissible to a civil servant at the following rate and scale:---

(i) A civil servant shall earn leave only on full pay. It shall be calculated at the rate of four days for every calendar months of the period of duty rendered and credited to the leave account as "leave on fully pay" duty period of 15 days or less in a calendar month being ignored and those of more than 15 days being treated as a full calendar month, for the purpose. If a civil servant proceeds on leave during a calendar month and returns from it during another calendar month and the period of duty in either month is more than 15 days, the leave to be credited for both the incomplete months will be restricted to that admissible for one full calendar month only.

(ii) The provisions of clause (i) will not apply to vacation departments. A civil servant of a vacation department may earn leave on full pay as under:--

(a) When he avails himself of vacation in a calendar year. At the rate of one day of every calendar month of duty rendered;

(b) When during any year he is prevented from availing himself of the full vacation. As for a civil servant in non-vacation Department for that year; and

(c) When he avails himself of only a part of the vacation. As in (a) above plus such proportion of thirty days as the number of days of vacation not taken bears to the full vacation.

Advised  
K

<sup>1</sup> Subs. by the Khyber Pakhtunkhwa Act No. IV of 2011.

<sup>2</sup> Subs. by the Khyber Pakhtunkhwa Act No. IV of 2011.

<sup>3</sup> Subs. by the Khyber Pakhtunkhwa Act No. IV of 2011.

<sup>4</sup> Subs. by the Khyber Pakhtunkhwa Act No. IV of 2011.

<sup>5</sup> Subs. by the Khyber Pakhtunkhwa Act No. IV of 2011.

<sup>6</sup> Subs. by the Khyber Pakhtunkhwa Act No. IV of 2011.

(iii) There shall be no maximum limit on the accumulation of such leave.

<sup>7</sup>[Note. Deleted]

**3. When leave earned.**---(a) All service rendered by a civil servant qualifies him to earn leave in accordance with these rules but shall not be earned during the period of leave.

(b) Any period spent by a civil servant in foreign service qualifies him to earn leave provided that a contribution towards leave salary is paid to the Government on account of such period.

**4. Grant of Leave on Full Pay.**---(1) The maximum period of leave on full pay that may be granted at one time by the competent authority shall be as follows:--

(i)	Without medical certificate	...	120 days
(ii)	With medical certificate	...	180 days
<b>PLUS</b>			
(iii)	On medical certificate from leave account in entire service.	...	365 days

(2) The maxima prescribed at (i) and (ii) of sub-rule (1) are independent of each other. In other words a civil servant may be granted, at a time, total leave on full pay on medical certificate upto the permissible extent in continuation of leave upto 120 days without medical certificate, subject to given conditions.

**5. Grant of Leave on Half Pay.**---(1) Leave on full pay may be converted into leave on half pay, at the option of the civil servant.

(2) Debits to the leave account will be at the rate of one day of the former for every two days of the latter, fraction of one-half counting as one full day's leave on full pay.

(3) The request for such conversion shall be specified by the civil servant in his application for the grant of leave.

(4) There shall be no limit on the grant of leave on half pay so long as it is available by conversion in the leave account.


**6. Conversion of Leave Account.**---(1) All leave at credit in the account of a civil servant who was in service on the 1st day of July, 1978, shall be carried forward and expressed in terms of leave on full pay. The leave account in such cases shall, with effect from 1st July, 1978 or in case of civil servant who was on leave on that date with effect from the date of his return from leave, be recast as under, ignoring the fraction if any:--

(i)	Leave of full pay--			
	(a)	1 month	...	30 days
	(b)	1 day	...	1 day
(ii)	Leave on half pay--			
	(a)	1 month	...	15 days
	(b)	2 day	...	1 day

(2) In carrying forward the leave, the leave at credit of a civil servant in columns 7 and 8 and half of the leave at credit in column 9 of the existing leave account shall be carried forward to the new leave account of the civil servant.

<sup>7</sup>. The "Note" at the end of rule 2 deleted by Notification No. FD. 50(SR-IV)5-54/80(Vol.II), dated 01-06-1982.

11

Attest  


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(3) The leave availed under the existing rules from column 13 (a) of the leave account shall be debited against the maximum limit of 365 days fixed under rule 4 (1) (iii).

**7. Leave not due.**---(1) Leave not due may be granted on full pay, to be offset against leave to be earned in future, for a maximum period of three hundred and sixty five days in the entire period of service, subject to the condition that during the first five years of service it shall not exceed ninety days in all.

(2) Such leave may be converted into leave on half pay.

(3) Such leave shall be granted only when there are reasonable Chances of the Civil Servant resuming duty on the expiry of the leave.

(4) Such leave shall be granted sparingly and to the satisfaction of the sanctioning authority but it shall not be admissible to the temporary civil servants.

**8. Leave Salary.**---(1) Leave pay admissible during leave on full pay shall be the greater of--

(a) the average monthly pay earned during the twelve complete months immediately preceding the month in which the leave begins; and

(b) the rate equal to the rate of pay drawn on the day immediately before the beginning of the leave.

(2) When leave on half pay is taken, the amount calculated under clause (a) and (b) of sub-rule (1) shall be halved to determine the greater of the two rates.

<sup>8</sup>[(3) A civil servant shall be entitled to the leave pay at the revised rate of pay if a general revision in pay of civil servants takes place or an annual increment occurs during the period of leave of the civil servant.]

**9. Special Leave to Female Civil Servants.**---As female civil servant may, on the death of her husband, be granted special leave on full pay not exceeding 130 days. This leave shall not be debited to her leave account and will commence from the date of death of her husband. For this purpose she will have to produce death certificate issued by competent authority either alongwith her application for special leave or, if that is not possible, the said certificate may be furnished to the leave sanctioning authority separately.

**10. Maternity Leave.**---(1) Maternity leave may be granted on full pay, outside the leave account, to a female civil servant to the extent of ninety days in all from the date of its commencement or forty five days from the date of her confinement, which ever be earlier.

(2) Such leave may not be granted for more than three times in the entire service of a female civil servant except in the case of a female civil servant employed in a vacation department who may be granted maternity leave without this restriction.

(3) For confinement beyond the third one, the female civil servant would have to take leave from her normal leave account.

(4) The spells of maternity leave availed of prior to the coming into force of these rules shall be deemed to have been taken under these rules.

(5) Maternity leave may be granted in continuation of, or in combination with, any other kind of leave including extraordinary leave as may be due and admissible to a female civil servant.

<sup>8</sup> Sub-rule (3) of rule 8 rule 8 added by Notif. No. FD.SO(SR-IV)5-54/80-Vol.III, dated 26.10.1994.

*A. K. S. S.*

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(6) Leave salary to be paid during maternity leave shall be regulated as for other leave, in accordance with the formula provided in rule 8.

(7) The leave salary to be paid during maternity leave will, therefore, remain unaffected even if any increment accrues during such leave and the effect of such an increment will be given after the expiry of maternity leave.

**11. Disability Leave.**---(1) Disability leave may be granted outside leave account on each occasion upto a maximum of seven hundred and twenty days on such medical advice as the head of office may consider necessary, to a civil servant, other than civil servant in part time service, disabled by injury, ailment or disease contracted in course or in a consequence of duty or official position.

(2) The leave salary during disability leave shall be equal to full pay for the first one hundred and eighty days and on half pay for the remaining period.

**12. Extraordinary Leave (Leave without Pay).**---(1) Extraordinary leave may be granted on any ground upto a maximum period of five years at a time; provided that the civil servant to whom such leave is granted has been in continuous service for a period of not less than ten years. In case a civil servant has not completed ten years of continuous service, extraordinary leave without pay for a maximum period of two years may be granted at the discretion of the leave sanctioning authority. This leave can be granted irrespective of the fact whether a civil servant is a permanent or temporary employee.

(2) The maximum period of extraordinary leave without pay combined with leave on full pay and leave on half pay shall be subject to the limit of 5 years prescribed in FR-18, i.e. the maximum period of extraordinary leave without pay that would be admissible to a civil servant who has rendered continuous service for a period of not less than 10 years shall be 5 years less the period of leave on full pay and leave on half pay so combined.

<sup>9</sup>[(3) Extraordinary leave may be granted retrospectively in lieu of absence without leave.]

**13. Leave on Medical Certificate.**---Leave applied for on medical certificate shall not be refused. The authority competent to sanction leave may, however, at its discretion, secure a second medical opinion by requesting the Civil Surgeon or the Medical Board to have the applicant medically examined. The existing provisions contained in Supplementary Rules 212, 213 and Rule 220 to 231 for the grant of leave on medical grounds will continue to apply.

**14. Leave Preparatory to Retirement.**---The maximum period upto which a Civil Servant may be granted leave preparatory to retirement shall be 365 days only. It may be taken subject to availability in the leave account, either on full pay or partly on full pay and partly on half pay, or entirely on half pay, at the discretion of the Civil Servant and it will not extend beyond the age of superannuation.

**15. Recreation Leave.**---Recreation leave may be granted for fifteen days once in a calendar year, the debit to the leave account may, however, be for ten days leave on full pay;

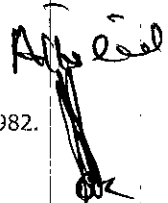
Provided that such leave shall not be admissible to a Civil servant in a vacation department.

**Note:** Casual Leave (as Recreation Leave) shall, however, continue to be granted for 10 days only subject to other conditions under Government instructions.

**16. Leave Ex-Pakistan.**---(1) Leave Ex-Pakistan may be granted on full pay to a civil servant who applied for such leave or who proceeds abroad during leave, or takes leave while posted abroad or is otherwise on duty abroad and makes a specific request to that effect.

(2) The leave pay to be drawn abroad shall be restricted to a maximum of three thousand rupees per month.

<sup>9</sup>. Sub-rule (3) of rule 12 added by Notification NO. FD.SO(SR-IV)5-54/80 (Vol.11), dated 01.06.1982.

Approved  


14

(3) The leave pay shall be payable in sterling, if such leave is spent in Asia other than Pakistan and India.

(4) Such leave pay shall be payable for the actual period of leave spent abroad subject to maximum of one hundred and twenty days at a time.

(5) The civil servants appointed after 17th May, 1958, shall draw their leave salary in rupees in Pakistan irrespective of the country where they spent their leave.

(6) Leave Ex-Pakistan will be regulated and be subject to the same limits and conditions as prescribed in rule 4,5 and 12.

**17. Assigning reasons for leave.**---It shall not be necessary to specify the reasons for which leave has been applied, so long as that leave is due and admissible to a civil servant.

**18. Commencement and end of leave.**---Instead of indicating whether leave starts / ends in the forenoon or after-noon, leave shall commence from the day following that on which a civil servant hands over the charge of his post. It shall end on the day preceding that on which he resumes duty.

**19. Absence after the expiry of leave.**---Unless his leave is extended by the leave sanctioning authority, a civil servant who remains absent (except for circumstances beyond his control) after the end of his leave shall not be entitled to any remuneration for the period of such absence and double credit of such absence shall be debited against his leave account. Such debit shall if there is insufficient credit in the leave account, be adjusted against future accumulations. Such double debit shall not preclude any disciplinary action that may be considered necessary under any rule for the time being in force after affording a reasonable opportunity to the civil servant concerned to indicate his position.

<sup>10</sup>**20. Encashment of Leave Preparatory to Retirement.**--- <sup>11</sup>[(1)] Where a civil servant opts not to avail the leave preparatory to retirement admissible to him under rule 14, he shall be allowed leave salary for the period for which leave preparatory to retirement is admissible, subject to a maximum of <sup>12</sup>[three hundred and sixty-five] days. For the purpose of lump sum payment in lieu of leave preparatory to retirement only the senior post allowance will be included in the leave pay so admissible. The payment of leave pay in lieu of leave preparatory to retirement may be made to the civil servant either in lump sum at the time of retirement or may at his option, be drawn by him monthwise, in arrears, for and during the period of leave preparatory to retirement. This amendment shall take effect from 01.07.1983.]

<sup>13</sup>[(2) Encashment of leave preparatory to retirement (LPR) not exceeding three hundred and sixty five days shall be effective from the first day of July, 2012 and shall, for the entire period of leave refused or opted for encashment, be applicable to a civil servant retired or, as the case may be, retiring on or, after the first day of July 2012, provided such leave is available at his credit subject to a maximum of three hundred and sixty five days.

(3) If at any time during such period, leave is granted on account of ill health supposed by medical certificate or for performance of Hajj, the amount of cash compensation on account of leave pay shall be reduced by an amount equal to the leave pay for the period of leave so granted]

(4) Leave pay for the purpose of encashment of LPR shall be computed on the basis of pay and allowances reckonable towards pension as shown in the last pay certificate of a civil servant.]

<sup>14</sup>**21. In Service Death, etc.**---(1) In case a civil servant dies, or is declared permanently incapacitated for further service by a Medical Board, while in service, a lump sum payment equal to leave

<sup>10</sup> Rule 20 substituted by Notification No. FD.SO(SR-IV)5-54(Vol:II), dated 24th August, 1983.

<sup>11</sup> Renumbered as sub-rule (1) by Notification No. (FR)FD-5-92/2005/Vol-V, DATED 13-12-2012

<sup>12</sup> Substituted for the words "one hundred and eighty" by Notification No. (FR)FD-5-92/2005/Vol-V, DATED 13-12-2012.

<sup>13</sup> Substituted for the words "one hundred and eighty" by Notification No. (FR)FD-5-92/2005/Vol-V, DATED 13-12-2012.

<sup>14</sup> Rule 21 substituted by Notification No.FD.SO(SR-IV)5-54/80(Vol:III), dated 03.05.1988

Attested  
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pay upto one hundred and eighty days out of the leave at his credit shall be made to his family as defined for the purposes of family pension or, as the case may be, to the civil servant.

(2) For the purpose of lump sum payment under sub rule (1), only the "senior prost allowance" will be included in the "leave pay" so admissible.]

**22. Recall from Leave.**---If a civil servant is recalled to duty compulsorily with the approval of the leave sanctioning authority, from leave of any kind, which he is spending away from his headquarters, he may be granted single return fare plus daily allowance as admissible on tour from the station where he is spending his leave to the place where he is required to report for duty. In case he is recalled to duty at headquarters and his remaining leave is cancelled, the fare then admissible shall be for one way journey only. If the order of recall to the civil servant is optional then the concession above mentioned will not be admissible.

**23. Any type of leave may be applied.**---A civil servant may apply for the type of leave which is due and admissible to him and it shall not be refused on the ground that another type of leave should be taken in the particular circumstances for example, a civil servant may apply for extraordinary leave or leave on half pay even if leave on full pay is otherwise due and admissible to him, or he may proceed on extraordinary leave followed by leave on half pay and full pay rather than on full pay, half pay and without pay.

**24. Combination of different types of leave etc.**---One type of leave may be combined with joining time or with any other type of leave otherwise admissible to the civil servant:

Provided that leave preparatory to retirement shall not be combined with any other kind of leave.

**25. Civil Servants on leave not to joint duty without permission before its expiry.**--- Unless he is permitted to do so by the authority which sanctioned his leave a civil servant on leave may not return to duty before the expiry of the period of leave granted to him.

**26. Leave due may be granted on abolition of post, etc.**---(1) When a post is abolished, leave due to the civil servant, whose services are terminated in consequence thereof, shall be granted without regard to the availability of a post for the period of leave.

(2) The grant of leave in such cases shall, so long as he does not attain the age of superannuation be deemed automatically to have also extended the duration of the post and the tenure of its incumbent.

**27. Manner of handing over charge when proceeding on leave, etc.**---(1) A civil servant proceedings on leave shall hand over the charge of his post, and if he is in Grade-16 and above, he shall, while handing over charge of the post, sign the charge relinquishment report.


(2) If leave ex-Pakistan has been sanctioned on medical grounds, the civil servant shall take abroad with him copy of the medical statement of his case.

**28. Assumption of charge on return from leave, etc.**---(1) A civil servant, on return from leave, shall report for duty to the authority that sanctioned his leave and assume charge of the post of which he is directed by that authority unless such direction has been given to him in advance.

(2) In case he is directed to take charge of a post at a station other than that from where he proceeded on leave, travel expenses as on transfer shall be payable to him.

**29. Account Officer to maintain leave account.**---(1) Leave account in respect of a civil servant shall be maintained as part of his Service Book.

(2) The Account Offices shall maintain the leave accounts of civil servants of whom they were maintaining the accounts immediately before the coming into force of these rules.

Atherul  




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**30. Leave to lapse when civil servant quits service.**---All leave at the credit of a civil servant shall lapse when he quits service.

**31. Leave application, its sanction, etc.**---(1) Except where otherwise stated, an application for leave or for an extension of leave must be made to the head of office where a civil servant is employed and, in the case of the head of office to the next-above administrative authority and the extent of leave due and admissible shall be stated in the application.

(2) An audit report shall not be necessary before the leave is sanctioned.

(3) When a civil servant submits a medical certificate for the grant of leave, it shall be by an authorised medical attendant in the form attached to these rules.

(4) Leave as admissible to a civil servant under these rules may be sanctioned by the head of a department, Attached Department, Office or any other officer authorised by him to do so and, when so required, leave shall be notified in the official Gazette.

(5) In case where all the applications for leave cannot, in the interest of public service, be sanctioned to run simultaneously, the authority competent to sanction leave shall, in deciding the priority of the applications consider:

- (i) whether, and how many applicants can, for the time being, best be spared;
- (ii) whether any applicants were last recalled compulsorily from leave; and
- (iii) whether any applicants were required to make adjustment in the timing of their leave on the last occasion.

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**FORM OF MEDICAL CERTIFICATE**

FORM-I

Signature of applicant \_\_\_\_\_

**MEDICAL CERTIFICATE FOR CIVIL SERVANTS RECOMMENDED FOR LEAVE OR EXTENSION**

I, \_\_\_\_\_ after careful \_\_\_\_\_ personal examination of the case, hereby certify that, \_\_\_\_\_ whose signature is given above, is suffering from \_\_\_\_\_ and I consider that a period of absence from duty of \_\_\_\_\_ more with effect from \_\_\_\_\_ is absolutely necessary for the restoration of his / her health.

Dated, the \_\_\_\_\_

Government Medical Attendant

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**APPLICATION FOR LEAVE**

FORM-II

Notes:--Item 1 to 9 must be filled in by all applicants, Item 12 applied only in the case of Government servants of Grade 16 and above.

1. Name of applicant.
2. Leave Rules applicable.
3. Post held.
4. Department or office.
5. Pay
6. House rent allowance / conveyance allowance or other compensatory allowances drawn in the present post.

*Attended*  
↓

17

- 7. (a) Nature of leave applied for.  
(b) Period of leave in days.  
(c) Date of commencement.
- 8. Particular Rule / Rules under which leave is admissible.
- 9. (a) Date of return from last leave.  
(b) Nature of Leave.  
(c) Period of leave in days.

Signature of applicant

- 10. Remarks and recommendation of the Controlling Officer.
- 11. Certified that leave applied for is admissible under Rule ..... and necessary conditions are fulfilled.

Signature  
Designation


- 12. Report of Audit Office.

Signature  
Designation

- 13. Orders of the sanctioning authority certifying that on the expiry of leave the applicant is likely to return to the same post carrying the compensatory allowances being drawn by him.

Signature  
Designation

Dated.....

Alwesi  


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**FORM III**

**FORM OF LEAVE ACCOUNT UNDER THE REVISED LEAVE RULES, 1981**

Leave Account of Mr. / Miss / M/s .....  
 Date of commencement of service .....  
 Date of attaining the age of superannuation .....

(N.B.—Instruction for filling in the form are printed on the succeeding pages.  
 LEAVE TAKEN (From Column 8 to 20)

PERIOD OF DUTY		PERIOD		LEAVE ON HALF PAY		LEAVE NOT DUE		ABSENCE		ATTENTION															
From	To	From	To	In terms of half pay	In terms of full pay	In terms of half pay	In terms of full pay	Actual No. of days	No. of days dubitable (double the actual number)	Days	Days														
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23			
Government Department served under		Leave at Credit (column 23+6)		Leave earned on full pay 4 days for each calendar month		Leave on full pay without medical certificate subject to maximum of 120 days & 365 days in case of I.P.R.		Leave on full pay on medical certificate subject to maximum of 180 days		Leave on full pay on medical certificate subject to maximum of 365 days in entire service		In terms of half pay		Recreation leave of 15 days in a year but 10 days to be debited.		In terms of half pay		In terms of full pay		Total leave (Columns 10+11+12+14+15+17+19)		Balance on 01.07.1978/return from leave (Column 7-20)		Remarks	

*Handwritten signature*

**Explanatory Instructions for Filling up the Leave Account Form**

1. This leave account will be maintained for all civil servants of the Provincial Government who were in service on the 1st July, 1978 including those who were on leave on that date and have not opted to retain the existing leave rules and all others who enter service on or after 1st July, 1978.

2. All leave at credit in the account of a civil servant who was in service on the 1st July, 1978 shall be converted in terms of leave on full pay at the following rates:--

(i)	Leave of full pay--			
	(a)	1 month	...	30 days
	(b)	1 day	...	1 day
(ii)	Leave on half pay--			
	(a)	1 month	...	15 days
	(b)	2 day	...	1 day

(Fraction, if any, to be ignored).

3. The leave account shall commence with an opening entry "Due on 1st July, 1978" or in the case of a Civil servant, who was on leave on 1st July, 1978 with effect from the date of his return from leave. For the purpose of computing the leave at credit, the service upto 30th June, 1978 will be taken into account. The leave due in terms of leave on full pay in days will be noted in Column No. 21.

4. (i) In calculating the leave earned on full pay at the rate of 4 days for every calendar month the duty period of 15 days or less in a calendar month shall be ignored and those of more than 15 days shall be treated as a full calendar month for the purpose. If a civil servant proceeds on leave during a calendar month and returns from it during another calendar month and the period of duty in either month is more than 15 days, the leave to be credited for both the incomplete months will be restrict to that admissible for one full calendar month only. There shall be a maximum limit on accumulation of this leave.

(ii) The provision (i) above will not apply to a vacation department. In its case, a civil servant may earn leave on full pay (a) when he avails himself of full vacation in a calendar year .....at the rate of one day for every calendar month of duty rendered (b) when during any year he is prevented from availing himself of the full vacation.....as for a civil servant in a non-vacation department for that year, and (c) when he avails himself of only a part of the vacation.....as in (a) above plus such portion of thirty days as the number of days of vacation not taken bear to the full vacation.

5. (a) Leave on full pay may be converted into leave on half pay at the option of the civil servant, the debit to the leave account will be at the rate of one day of the former for every two days of the latter, fraction of one half counting as on full days leave on full pay. The request for such conversion shall be specified by the civil servant in his application for the grant of leave.


(b) There shall be no limit on the grant of leave on half pay so long as it is available by conversion in the leave account.

6. L.P.R. on full pay will be noted in column No. 10 while that on half pay in columns No. 13 and 14.

7. Leave not due may be granted on full pay to be off-set against leave to be earned in future for a maximum period of 365 days in the entire period of service subject to the condition that during the five years of service it shall not exceed 90 days in all. Such leave may be converted into leave on half pay. It shall be granted only when there are reasonable chances of the civil servant resuming duty.

8. The grant of Special Leave, Maternity Leave, Disability Leave, Extraordinary Leave, payment of leave pay for refused L.P.R. upto a maximum of 180 days lump sum payment equal to full pay upto 180 days out of leave at credit made to the family of a Government servant whose death occurs while in service, Seaman sick leave, Departmental Leave, Study Leave, Hospital Leave and Quarantine Leave shall be noted in Column No. 22. Maternity leave other than three times in entire service shall however be debited to the relevant column of the leave account.

9. When a Government servant applies for the leave columns 2 to 7 shall be filled in showing the period of duty upto the date preceding that on which a Government servant intends to go on leave. The full calendar months to be noted in column 5 shall be worked out on the lines indicated in para 4 above.

Alberic  


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10. When a Government servant returns from leave, column 8 to 23 shall be filled in according to the nature of leave. If leave not due to is availed of the minus balance to be shown in column No. 21 should be written in red ink.

-----

Attested





~~XXXXXXXXXXXXXXXXXXXX~~

(H/S)

(H/S) 21

OFFICE OF THE DISTRICT EDUCATION OFFICER  
(MALE) DISTRICT BUNER  
PHONE & FAX NO. 0939-555110  
EMAIL: edobuner@gmail.com



Amma B

LEAVE SANCTION.

The Competent Authority is pleased to grant sanction of Extra Ordinary Leave (E.O.L) in r/o Mr. Inayatullah SPST GPS Alagram with effect from 01-03-2022 to 20-12-2022 (9 months & 20 days) without pay as due and admissible to him under the Khyber Pakhtunkhwa Revised Leave Rules 1981. as recommended by the SDEO(M) Gagra vide his office Endst No.417 dated 21/01/2022.

Note:- 1.Necessary entry should be made in his Service Book accordingly.

(IFTIKHARUL GHANI)  
DISTRICT EDUCATION OFFICER (M)  
BUNER.


Endst; No. 493-97

Dated 01/02 /2022.

Copy is forwarded for information to the: -

1. District Accounts Officer Buner at Dagger.
2. Education Monitoring Authority EMA Buner.
3. SDEO(M) Gagra.
4. Official concerned.

Altaf

  
DISTRICT EDUCATION OFFICER (M)  
DISTRICT BUNER.

13/22

بخدمت جناب - SDEO (M) صاحب سب ڈویژن جعفری ضلع لوہاڑہ  
عنوان: درخواست برآمد تبادلہ از GPS الہ گرام تا GPS سواری تحصیل گاڑہ

(18)

جناب عالی! گزارشی کی حیاتی ہے کہ میں GPS الہ گرام تحصیل جعفری میں بحیثیت SPST ایسی ڈیوٹی سرانجام دے رہا ہوں۔ یکم مارچ 2022 سے 20 دسمبر 2022 تک E.O.L عیاز دفتر سے لی گئی۔ اب چونکہ 20 دسمبر کو میری طبی پوری ہو جائے گی اب میں جی بی ایس الہ گرام سے GPS سواری کو تبادلہ کرنا چاہتا ہوں۔ کیونکہ الہ گرام میرا رہائش ہے۔ 28 کلو میٹر دور ہے اور آگے جانے میں مشکلات ہے۔ لہذا آگے صاحبان میری اس درخواست پر عملدراندہ طور پر مہم چلا کر منظور فرمائیں۔

نوٹ: جی بی ایس الہ گرام سے اکتوبر 2019 سے ڈیوٹی سرانجام دے رہا ہوں۔

العارضہ

عنايت اللہ SPST

جی بی ایس الہ گرام ضلع لوہاڑہ

مورخہ 07/12/2022

The application is used on reality forwarded for N/A to the high up

Head Teacher GPS Alagram Buner

7/12/2022

7/12/2022

Advocate High Council Buner  
for favorable consideration please  
Telephone Officer  
hagharzai

Received by PA  
TO DDO (M) Buner  
District Education



OFFICE OF THE SUB DIVISIONAL EDUCATION  
(M) CHAGARZI DISTRICT BUNER

No. 126 /

Dated: 13 / 02 / 2023

~~13~~  
23  
23

To

The District Education Office (M)  
Buner.

*Amir Khan ID*

Subject: ADJUSTMENT OF MR. INAYAT ULLAH (SPST) GPS  
ALAGRAM.

Memo:

Reference to the subject cited above, it is submitted for your kind information and further necessary action that Mr. Inayat Ullah (SPST) had taken EOL w.e.f 1-3-2022 to 20-12-2022 (9 Months and 20 Days). Now the leave of the official concerned has expired.

Therefore his adjustment may please be made at any school.

*(Signature)*

SUB DIVISIONAL EDUCATION  
OFFICER (M) CHAGARZI BUNER

*(Signature)*

ADEO (BUNER) P.P.Y.

*18700 with adjustment order.*

*9  
14/1/23*

*Attested*  
*(Signature)*





*Amroza*

*Amroza "E"*

(MALE) DISTRICT BUNER  
PHONE & FAX NO. 0939-555110  
EMAIL: edobuner@gmail.com

*24*

**SHOW CAUSE NOTICE**

*492*

I, Mr. Ifrikhar Ul Ghani, District Education officer (M) Buner, as a Competent Authority, under the Khyber Pukhtunkhawa Government Servant (Efficiency & Discipline) Rules 2011, do hereby serve upon you, **Mr. Inayatullah SPST, under-adjustment at GPS Gujar Abad Tehsil Khado Khel District Buner**, this show cause notice as follow:-

1. That on expiry of your Extra Ordinary Leave (without pay) issued vide this office No.483-87 Dated 01/02/2022, you neither informed your concerned SDEO nor this office in order to adjust you against any vacant SPST post and remained absent w.e.f 21/12/2022 till date, however, reportedly, you adjust yourself in a certain school without informing the SDEO and proper order/approval of the undersigned, thereby exercising the authority of the DEO, which is utter violation of rules and regulations.
2. That the SDEO concerned sent a letter to this office requesting therein to adjust you after expiry of your leave. In the light of the aforementioned letter you were adjusted at GPS Gujar Abad Tehsil Khadu Khel vide this office order No. 802-05 dated 17/2/2023, where you have not taken over charge as yet.
3. That after your adjustment, you pressurize the undersigned to adjust you at a nearest station, which was not possible due to available vacancies, owing to which you started blackmailing and defaming the undersigned on social media, which is violation of the Conduct Rules 1987, sub-rules (21), (24), (25) and (34-A sub-rules (1)(2).
4. That you blatantly defame the undersigned and disseminate perverse comments/information through social media on shaky and flimsy grounds, reprimanding, tongue-lashing and condemning official business of the Government as well as the undersigned just to instigate and instigate teachers fraternity and general public against this office, which is an utter violation of Conduct Rules 1987, sub-rules (21), (24), (25) and (34-A sub-rules (1)(2) of the rules ibid and E&D Rules 2011.
5. That you stigmatize, malign and slag off the character of certain officers of this Department including the undersigned without any proof by posting unauthorized, baseless information through various comments on various posts on facebook.
6. That you are guilty of continuously creating embarrassing situation for the Govt. as well as Elementary and Secondary Education Department by propagating falsification and misrepresentation of facts and figures.
7. That you are guilty of professional dishonesty, abetment, inefficiency and misconduct under Rule-3 (a) (b) of the Khyber Pukhtunkhwa Government Servants ( Efficiency and Discipline) Rules 2011 read with Conduct Rules 1987 sub-rules (21), (24), (25) and (34-A sub-rules (1)(2) of the rules ibid.
8. That you have ceased to be efficient and are guilty of misconduct and liable to be proceeded under the rules for the charges given hereinabove.

2. In terms of Rule-5 (a) of the Khyber Pukhtunkhwa Government Servants ( Efficiency and Discipline) Rules 2011, I, as a Competent Authority dispense with the inquiry and serve you with a showcause notice under Rule-7 of the ibid rules.

3. By reasons of the above, you appear to be guilty of inefficiency and misconduct under Rules 3 (a) and (b) defined in Rules 2 (I) (i), (ii) (iii) and (v) of the Khyber Pukhtunkhwa Government Servants (Efficiency and Discipline) Rules 2011, read with rules (21), (24), (25) and (34-A sub-rules (1)(2) of Conduct Rules 1987 and have rendered yourself liable to all or any of the penalties specified in Rule-4 of the Rules ibid.

4. As a result thereof, I, as the Competent Authority, have tentatively decided to proceed against you under the above mentioned rules. You are, therefore, required to show cause as to why one of the major/minor penalties specified in **Rule 4 of the Khyber Pukhtunkhwa Government Servants( Efficiency and Discipline) Rules 2011**, should not be imposed upon you and also intimate whether you desire to be heard in person. If no reply to this office is received within 07 days of its delivery, it shall be presumed that you have no defense to put in and in that case Ex-parte action will be taken against you, which may culminate in your removal from service.

(IFTIKHAR UL GHANI)  
DISTRICT EDUCATION OFFICER (M)  
BUNER

Endst: No. *873-17* / Dated *20/2* /2023.

*Atty*

- Copy forwarded to:-
- 1- The Director of Elementary and Secondary Education Khyber pukhtunkhwa, Peshawar.
  - 2- SDEO (M) Khadu Khe! and Chagharzi.
  - 3- DMO, EMA Buner.
  - 4- The Official Conce.rned.
  - 5- Master File

*[Signature]*  
DISTRICT EDUCATION OFFICER (M)  
BUNER *20/2/23*



Amexa "F"  
OFFICE OF THE DISTRICT EDUCATION OFFICER  
(MALE) DISTRICT BUNER  
PHONE & FAX NO. 0939-510468  
EMAIL: edobuner@gmail.com



OFFICE ORDER.

Consequent upon the expiry of E.O. leave on 20/12/2022, the Competent Authority is pleased to adjust Mr. Inayatullah SPST at Govt. Primary School Gojjar Abad in the best interest of public service.

Note :-

1. No TA DA is allowed.
2. Charge report should be submitted to all concerned.

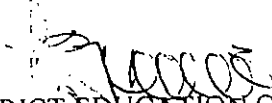
(IFTIKHR UL GHANI)  
DISTRICT EDUCATION OFFICER (M)  
BUNER.

Endst;No. 802-05

Dated 17/02 2023.

Copy is forwarded for information to the:-

1. District Accounts Officer Buner at Daggar.
2. District Monitoring Officer Buner
3. Sub Divisional Education Officers concerned (M) Buner.
4. Official concerned.

  
DISTRICT EDUCATION OFFICER (M)  
BUNER.

17/2/23

Amexa "F"

To,

The District Education Officer  
Buner at sawari

*Amuexu "G"*

*ADYO (ESTB = P dy)*

Subject: Reply of show cause notice by Inayat Ullah SPST presently performing his duty as SPST at GPS Alagram Tehsil Chagharzi Distt Buner.

Preliminary Objections:

- 1) That the show cause notice issued by DEO (M) BUNER (Iftikhar UI Ghani) is base on malafide and ill-well of DEO (M) Buner (Iftikhar UI Ghani) and has no effect on me.
- 2) That I Inayat Ullah was posed by education department as SPST at GPS Alagram against the transfer/posting and appointment Act-2011 and I performing my duty at GPS Alagram since 29-10-2019.
- 3) That as per policy and Act, the behavior of DEO (M) Buner (Iftikhar UI Ghani) is discriminatory because I was posed as SPST in GPS Alagram in violation of rules and the posts of SPST were vacant in UC Rega and adjacent UCs.
- 4) That my application for leave the concerned authorities were pleased to grant me 9 months & 20 days leave, and before expiry of leave I made application to DEO (M) Buner (Iftikhar UI Ghani) for transfer and adjustment to nearby schools lying vacant in UC Rega etc which was forwarded to the DEO (M) Buner (Iftikhar UI Ghani) through proper channel (copy attached).
- 5) That on 21-12-2023 I joined my duty in GPS Alagram and charge report was forwarded to concerned authorities copy attached
- 6) That the behavior of DEO (M) Buner (Iftikhar UI Ghani) is discriminatory with me and DEO (M) Buner (Iftikhar UI Ghani) in violation of rules, regulation and Act issued an illegal order dated 17-02-2023 and adjusted me at GPS Gujjar Abad.
- 7) That the below impugned transfer/adjustment order was neither sent to me nor I was informed by DEO (M) Buner (Iftikhar UI Ghani) etc.
- 8) That the proper procedure was not adopted by DEO (M) Buner (Iftikhar UI Ghani) which indicate the ill-well of DEO (M) Buner (Iftikhar UI Ghani).
- 9) That on 17-02-2023 the impugned order was issued which was not even sent to me but on the next working day DEO (M) Buner (Iftikhar UI Ghani) visited GPS Gujjar Abad and a show cause notice was issued against me which further indicate the ill-well of DEO (M) Buner (Iftikhar UI Ghani).

The parawise reply of show cause notice is as below...

- 1) It is stated that concerned authority provided leave to me which was expired on 20-12-2022 and before expiry of my leave, I filed application for adjustment and transfer to near by schools laying vacant in UC Rega etc. as per transfer and posting Act-2011 on 07-12-2022 the SDEO (M) Chagharzi through proper channel and after expiry of my leave I assumed my duty at GPS Alagram on 21-12-2022 and charge report was maintained and has been sent to officials on 21-12-2022. So no violation was made by me. (Copy of application and charge report is attached as annexer A).
- 2) It is stated that I assumed my charge and duty in GPS Alagram and has already informed concerned authorities in this regard and was not informed by any one regarding illegal order of

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transfer/adjustment dated 17-12-2023 as the transfer/adjustment order was even not sent to me till now and para 2 of show cause notice is contradiction to para 1.

- 3) The para No.3 of show cause notice is incorrect hence denied as I have not pressurised the DEO (M) Buner (Iftikhar UI Ghani) but according to section 3 of transfer/posting and appointment act-2011 made application to DEO (M) Buner (Iftikhar UI Ghani) through proper channel which was neglected by the DEO (M) Buner (Iftikhar UI Ghani) without any legal cause but in violation of transfer/posting and appointment act-2011 I was illegally transferred to GPS Gujjar Abad which is situated in tehsil khudokhel and post of SPST is laying vacant in GPS Swari UC Rega as I belong to UC rega, so mere allegations were made against me to pressurise me to follow the illegal order transfer/adjustment which is based on ill-will of DEO (M) Buner (Iftikhar UI Ghani).
- 4) That para No.4 of show cause notice is incorrect hence denied and I have not made any social media comments against DEO (M) Buner (Iftikhar UI Ghani) but DEO (M) Buner (Iftikhar UI Ghani) made baseless allegations against me which is violations & of law, regulations and fundamental right of me and I was tortured by sending the show cause notice and charging me allegations.
- 5) Para No.5 of the show cause notice is incorrect hence denied and I have made no unauthorized baseless information through various comments on facebook regarding DEO (M) Buner (Iftikhar UI Ghani), but allegations were made against by this show cause notice.
- 6) That the para No.6 of the show cause notice is incorrect & denied and I have never creating embarrassing situation for the govt as well as E & S E department by propagating falsification and miss representation of facts and figures but serious allegations were made against me by the DEO (M) Buner (Iftikhar UI Ghani).
- 7) That the para No.7 of show cause notice is incorrect hence denied and I have committed no offence and I am honest and a professional teacher and performing my duty efficiently but the DEO (M) Buner (Iftikhar UI Ghani) have charged me with serious allegations without any proof and I was mentally tortured by the baseless allegations of DEO (M) Buner (Iftikhar UI Ghani).

8/1) That I have committed no offence but mere allegations were made against me which is the violations of my fundamental rights and indicated the ill-will of DEO (M) Buner (Iftikhar UI Ghani), who has miss used his power and post which is also the violations of law & regulations.

8/2) That the show cause notice sent to me is the violation of law, rules and regulations as I have committed no mistake but DEO (M) Buner (Iftikhar UI Ghani) on one pretext or other trying to pressurize me through this illegal show cause notice.

8/3) I have committed no offence but an illegal show cause notice has been issued against me which is violation of law, rules & regulations as baseless allegations were made against me in the show cause notice.

8/4) That this show cause notice has been issued against me just to provide illegal cover to illegal order and a action of DEO (M) Buner (Iftikhar UI Ghani) as I have committed no offence and you have charged me with serious allegations without any proofs and I was mentally tortured due to your baseless and serious allegations & I have rights to file damages suit against you in the competent court of law.

So it is most humbly prayed that the show cause notice dated 20-02-2023 issued against me, may please be dropped in the best interest of justice and fairplay.

*Amir*  


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سوال نمبر 20: سر پرہیزگار کو آگے کی جگہ پر منتقل کر کے  
کام چلانے کے لیے نوٹس دینے کی درخواست کیا گیا ہے۔

20 دسمبر 2022 کو میری چھٹی ختم ہو رہی تھی جبکہ سب سے پہلے نوٹس (1) میں  
کیلئے درخواست کی گئی تھی جسے پریزیشنر جی بی ایس ایس الیہ الیہ ایس ایس ایس اور SDEO صاحبان نے  
مزید کارروائی کیلئے بھیجی۔ اور اس درخواست کی نقل میں نے ہی دفتر DEO صاحب میں بھیجے تھے اور PA کے DEO  
میں اس کی دستخط بھی کی تھی۔ اور یہ نقل 16/12/2022 کو PA کے دفتر میں جمع کیا۔ (نقل اور 2)  
اور ڈی ای او صاحب نے ٹرانسفر کے خواہشمند استاذانہ سے درخواستیں طلب کی تھیں اور میں درخواست  
SDEO جنسز کو اس کے ساتھ پیش کر رہا ہوں جو انہیں قابل فہم اور سلی بخار کو درخواست پر اتنے تیار  
صحیح (نقل اور 2)

سوال نمبر 20: چھٹی ختم ہونے کے بعد آپ نے کیا کیا؟  
جواب: 20 دسمبر 2022 کو میری چھٹی ختم ہو رہی تھی اور 21 دسمبر 2022 کو میں نے جی بی ایس الیہ الیہ  
میں چارج لیا۔ اور اسی دن یعنی 21 دسمبر 2022 کو میں چارج رپورٹ بہت مشکل SPST کی پی  
الین تھال میرہ SDEO کے دفتر میں جمع کیا۔ اور موسم سرما کے چھٹیوں تک جی بی ایس الیہ الیہ ایس  
اپنی ڈیوٹی جاری رکھی۔ اور موسم سرما کے چھٹیوں شروع ہوئے۔ اور اور ابھی تک جی بی ایس  
الیہ الیہ ایس میں اپنی ڈیوٹی سے انجام دے رہے ہوں۔ (نقل اور 3)

سوال نمبر 20: آپ کی درخواست پر کیا فیصلہ ہوا؟  
جواب: آپ نے حکم عدول کی درخواست کی۔ میں نے جی بی ایس الیہ الیہ ایس میں چارج لیا اور  
موسم سرما کے چھٹیوں میں یعنی 20/12/2022 کو DEO صاحب نے میری درخواست جی بی ایس الیہ الیہ ایس  
کر دی۔ اور ایک ہفتہ بچے آفس آؤٹ نہیں ملا۔ اور اگلے روز ڈی ای او صاحب نے ٹرانسفر کے خواہشمند  
کہ آپ ابھی تک غیر حاضر ہے اور آپ نے ابھی تک چارج نہیں لیا۔ حالانکہ میں ٹرانسفر اور چارج  
کیلئے 12-11-2022 کو درخواست دی تھی کہ جی بی ایس الیہ الیہ ایس میں چارج لیا جائے اور سب سے پہلے  
DM کو رپورٹ ہو جائے لہذا میری درخواست جی بی ایس الیہ الیہ ایس میں کرنا۔ اور چارج لیا جائے جو کہ  
درجہ ہے جو کہ میرے لئے ہے۔ اور میرے پاس میری درخواست کی نقل تو مجھے آنا چاہئے ہے۔

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آج ابھی تک جس بی ایس اے کے نام میں ڈیوٹی ہے

غور:- میں ابھی تک جی ای ایف الیہ گرام میں ایسی ڈیوٹی سربراہان سے دریافت نہیں کی ہے  
ڈی ای ایف کو بتا رہا ہوں کہ 23-02-26 کو اپیل کی ہے کہ مجھے اپنے ترقی پونڈ  
جس سے نیاز صین (SPST) کی پروفیشنل ڈیوٹی کو پہنچی ہے اور اس سے پہلے میں ابھی تک اس  
کی سیٹ خالی ہے اور ایک بعد 23-02-28 کو ڈائریکٹر ہے۔ حکمہ تسلیم کو اپیل کی ہے کہ میں  
درخواست پر ہمدردانہ طور پر جان کر مجھے انصاف فراہم کرے۔ (تقولف ہے) (۴)

*[Handwritten signature]*

عنایت اللہ SPST

جی ای ایف الیہ گرام ضلع لوئر  
20-03-2023

اللہ  
*[Handwritten signature]*



*Amir Khan*

GOVERNMENT OF KHYBER PAKHTUNKHWA  
 OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER  
 MALE KHIDU KHEL BUNER

Phone: 03474766597/03412238561 Email: sdeokhudukhel@gmail.com



No-2114 dated 15-04-2023

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*Amir Khan*

To

The District Education Officer

(Male) Buner

Subject: Non-Compliance report in R/O Inayat Ullah SPST GPS Gujar Abad Khudu khel Buner

Memo:

In compliance of your worthy office order no-802-05 dated 17-02-2023, it is reported that Mr. Inayat Ullah SPST has not taken over charge of his duties uptill now i.e., 15-04-2023.

Hence Non-compliance report is submitted for further necessary action please.

*Amir Khan*  
 15/04/23

SUB DIVISIONAL EDUCATION OFFICER  
 MALE BUNER

ADROCEB: JPN  
 15/4/23

*Amir Khan*



~~Amman J~~

OFFICE OF THE DISTRICT EDUCATION OFFICER (M)  
(MALE) DISTRICT BUNER  
PHONE & FAX NO. 0939-555110  
EMAIL: edobuner@gmail.com

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Amman J

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**NOTIFICATION.**

1. WHEREAS, Mr Inayatullah, SPST GPS Alagram, under adjustment at GPS Gujjar Abad, was on extra ordinary leave 01/3/2022 to 20/12/2022 which was due to expire on 20/12/2022.
  2. AND WHEREAS, after the expiry of his leave, he neither reported submitted his arrival to the office of the undersigned nor to the SDEO concerned for further adjustment.
  3. AND WHEREAS, the SDEO Chagharzi vide his office letter No. 126 dated 13/02/2023 intimated this office regarding the expiry of his E.O.L. and requested his further adjustment.
  4. AND WHEREAS, the DEO, as the Competent Authority, made an order of his adjustment at GPS Gujjar Abad vide this office Endst No. 802-05 dated 17/02/2023.
  5. AND WHEREAS, he failed to comply with his adjustment order and did not take over charge of his duty at GPS Gujjar Abad and remained absent since then..
  6. AND WHEREAS, the Competent Authority issued him show cause notice vide this office Endst No. 873-77 Dated 20-02-2023 under rule 7, dispensing with the inquiry for the reasons that the non-compliance, misconduct and absence had sufficient valid and reliable evidence and did not need any further inquiry.
  7. AND WHEREAS, he submitted reply to the showcause notice which was perused by the Competent Authority, however, his reply to the show cause notice was unsatisfactory and devoid of valid reasons and defense on sound basis.
  8. AND WHEREAS, the DEO, as the Competent Authority, called him for personal hearing vide this office Endst No. 1089 dated 03/03/2023.
  9. AND WHEREAS, he appeared before Deputy DEO, as authorized by DEO to afford personal hearing for to him, where he recorded his answers to the questions in black and white on 20/03/2023.
  10. AND WHEREAS, his reply to the questions during personal hearing, was also found unsatisfactory.
  11. AND WHEREAS, keeping in view allegations in the showcause notice, his reply to the allegation given therein followed by affording personal hearing on dated 10/03/2023, all allegations of absence misconduct and inefficiency have been proved
  12. NOW, THEREFORE, in exercise of the powers conferred under rule 4(b)(i) of the Khyber Pakhtunkhwa Govt Servants (Efficiency & Discipline) Rules 2011, as amended vide Government of Khyber Pakhtunkhwa Establishment Department (Regulation Wing) No.SO(Policies)E&AD/2-6/2021 Peshawar Dated the 31/12/2021, I, Mr. Iftikhar Ul Ghani DEO(M) Buner as the Competent Authority, am pleased to impose major penalty of "Reduction to lower post and pay scale from SPST BPS 14 to PST BPS 12 for maximum period specified in rule 4(b)(i)" upon Mr. Inayatullah SPST GPS Gujjar Abad. The intervening period w.e.f 21/12/2022 to 31/05/2023 is treated as leave without pay.
- In consequence of the above, since, as per sub section 3 of section 3 (proviso) of the Khyber Pakhtunkhwa (Appointment & Transfer of the Teachers, Lectures Instructors and Doctors Regulatory Act:2011, PST, BPS -12 is a Union Council based post, , therefore, he is hereby adjusted at GPS Bishpur (U/C Rega, Tehsil Gagra) which is union council of his domicile.

Note: Necessary entry to this effect should be made in his Service Book accordingly

(IFTIKHAR UL GHANI)  
DISTRICT EDUCATION OFFICER (M)  
DISTRICT BUNER

Endst No. 2590-46 Dated 31/5 /2023.

Copy is forwarded for information to the:

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa
2. Deputy Commissioner Buner.
3. District Monitoring Officer Buner.
4. District Accounts Officer.
5. SDEOs(M) concerned.
6. Official concerned.
7. Master File.

DISTRICT EDUCATION OFFICER (M)  
DISTRICT BUNER



Amma "K"

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Most Immediate  
Court Matter



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

Phone No: 091-8225339, Fax # 091-8219936

No. LCIS7/AD (Lit-II)

Dated Peshawar the 06 / 06 / 2023

To

The District Education Officer,  
(Male) Buner.

Subject: - **SUBMISSION OF JOINT PARA WISE COMMENTS**

Memo:

I am directed to enclose herewith a Notice received dated 12-06-2023 from the Registrar, Khyber Pakhtunkhwa Service Tribunal Peshawar & to state that the Service Appeal No. 1270/2023 under case titled Inayat Ullah Vs Govt: of Khyber Pakhtunkhwa & others is pending before Khyber Pakhtunkhwa Service Tribunal Peshawar for reply on behalf of the Respondents.

**Therefore, you are directed to submit the Joint Para wise Comments in the titled case being a competent authority, on the next date of hearing fixed as on 03-07-2023 please.**

An early action will be highly appreciated being Court matter.

*[Signature]*  
ASSISTANT DIRECTOR (LIT: II)

Endst No: \_\_\_\_\_/

Dated Peshawar the: \_\_\_/\_\_\_/2023.

**Copy forwarded for information to the:-**

1. Section Officer (Lit-II) E&SED Khyber Pakhtunkhwa Peshawar.
2. PA to Director (E&SED) Peshawar.

Office of the DEO(M) Buner

Entry No. ....

Branch. AD-50 Lit

Signature. *[Signature]*

14/7/23

ASSISTANT DIRECTOR (LIT: II)

*[Signature]*

**"B"**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**  
JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR.

No. TCS

SB

Appeal No. 1270 of 20 23

Inayat ullah Appellant/Petitioner

Versus  
DEO (M) ESSB Respondent

Respondent No. (1)

Notice to: District Education Officer (M) ESS Education Deptt: District Buner at Daggar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on 03/07/2023 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition. ✓

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No.....dated.....~~

Given under my hand and the seal of this Court, at Peshawar this 12/6  
Day of June 20 23

APRO (07)  
26/6/23  
For Reg  
Alimin

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

- Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.

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# Register of Letters Despatched



# رجسٹر ڈاک روانگی

Serial NO.	Month & Date	Name and Address نام اور پتہ	Place مقام	Subject مضمون	File NO. فائل نمبر	Stamps Received ٹکٹ آمد		Stamps Used ٹکٹ استعمال		Stamps Balanced بقایا ٹکٹ		Remarks کیفیت
						Rs.	Ps.	Rs.	Ps.	Rs.	Ps.	
2539-44	27/2	ALL CONCERNED.		Sanction of leave.								
2545	"	ADC Bannu		Allocation for Budget.								
2546-47	"	ALL CONCERNED		Show cause notice.								
2549	"	D e Bannu		Fee dues in								
2550	"	Islamia College		Authentication of originality of Mys dett.								
2551	"	Abdus Wali Khan		Show-cause notice for Salary								
2552	"	DBDC Dept		RBDC left case in R/p S/20/14/11								
2553	"	Director (255)		Application for 12/12 leave								
2554-57	"	ALL CONCERNED		Show-cause notice								
2558	"	Controller of		Verification of D.M.C.								
2559	"	"		"								
2560	"	"		"								

Alister

2561	"	ASSISTANT D.T.O. BARR.	Confirmation of School leaving cert.			
2562	"	D.O. BARR.	A.C. BARR.			
2563	"	D.O. BARR.	A.C. BARR.			
2564	"	Bank authority manager NBP Duggur	Bank authority of S.H.S. BARR.			
2565	31/5	D.T.O. BARR.	Sanction stipend of DSS School = 709000/-			
2566-68		S.D.B.S. Tehsil Gajra	Conducting of Training for Teacher on Health Hygiene and Health Service			
-	"	All principals H/M in charge				
-	"	G.H.S./G.I.T.S./G.M.S. Gajra Barr				
2569-71		D.T.O. BARR.	G.P.F. Advance Sanction			
	"	Principals H/M Council S.D.B.S. Council				
2572-75		Manager NBP Duggur	Notification	Javid Akhtar	SPT a	
	"	1) A.N.E.U. BARR local office				
	"	2) A.N.E.U. ESTH local office				
	"	3) Master file				
2576	"	Principal/Head master BARR.	Camp Duty at Kalam			
2577	"	-do-	Shahen Soot leader Const Kalam			

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# Register of Letters Despatched



## رجسٹر ڈاک روانگی

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Serial NO.	Month & Date	Name and Address نام اور پتہ	Place مقام	Subject مضمون	File NO. فائل نمبر	Stamps Received ٹکٹ آمد		Stamps Used ٹکٹ استعمال		Stamps Balanced بقایا ٹکٹ		Remarks کیفیت
						Rs.	Ps.	Rs.	Ps.	Rs.	Ps.	
2578	کینیڈا	Remander-I Scout Camp	BUNER	Boy scout Camp								
2579	-do-	All principals/HM	Buner	Boy scout Camp Kalan								
2580	-do-	All principals/HM	BUNER	Boy scout Camp Abbotts								
2581	-do-	" "	"	Kumrat Di								
2582	-do-	" "	"	Scout leader course Abbotts								
2583	-do-	ABL Swart	Buns	Account Operating Authority								
2584-89		All candid.		Haji demand via Muhammad Raza								
2590-96		Director PSE		Notification Redaction of Power post Mayatullah								PSI
		DC Buns										
		DMO Buns										
		DA Buns										
		SPROs Council										
		Officer Council										

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2597	31 <sup>S</sup> / <sub>23</sub>	DL Bure	B + PUG				
2598		SDEO C/P					
2599		Director ESSE HQ Reshar	upgradation of DM BS-15 to SDM 16 GHS - Current				
2600		A D C Bure					
		M M curd					
2602		D A O Bure	Sanction of AC Bill	RS-18000/-			
2603-8		D A O Bure	Sanction of Leave	Fatek Sher	N/A		
		D M O - EMA Bure					
		Principal GHS Noyam					
		PA to DEO (M) Bure					
		Official curd					
		Master file					
2609-13		D A O Bure	Retirement Sanction	Abdul Nazeem	Sweepers		
		Principal GHS Chigler					
		Official curd					
		PA to DEO (M) Bure					
		Master file					

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# Register of Letters Despatched



# رجسٹر ڈاک روانگی

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Serial NO.	Month & Date	Name and Address نام اور پتہ	Place مقام	Subject مضمون	File NO. فائل نمبر	Stamps Received ٹکٹ آمد		Stamps Used ٹکٹ استعمال		Stamps Balanced بقایا ٹکٹ		Remarks کیفیت
						Rs.	Ps.	Rs.	Ps.	Rs.	Ps.	
2614	19	Director, F&SE, U.P. Dept.		Regularization order								
"	"	A. D. C. Bunn										
"	"	3) DEMA Bunn										
"	"	4) D.A.O. Bunn										
"	"	5) SDFOS Bunn										
"	"	6) Official Bunn										
2620	"	Deputy Quarter		Request for grant for A/c Appointment Deputy Quarter								
2621	"	under 30277307		simple receipts								
2622	"	A. D. C. Bunn		submission of research statement - January - February								
2623	"	A. D. C. Bunn										
2624	"	Director (F&SE) U.P. Dept.		M. Phil. Allowance								
2625	"	"		Application for								
2626	"	"		"								

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2627-31 <sup>5</sup> / <sub>25</sub>	Calicut Alia Islamic	Verification of DNI
2628	Directorate (L2522) 140	Applicant for false name
2629	RB & DC 10/12	Applicant for retirement
2630-34	All concerned	Retirement description Hyderabad Police
2635-37	All concerned	Notation
2639-42	All SD/O/AS/Os	
"	H/O concerned	
2641	Section officer (L2522) 140	DISCIPLINARY ACTION AGAINST MR. TAJU
"	"	HAUSSANU GHAS SHAZI LEFT DISMISS
2642-44	All concerned	- do -
2645-2 <sup>06</sup> / <sub>23</sub>	RB & DC 10/12	RB & DC 10/12 case in AIO Zaitaf
2646-48	All concerned	ALOC to Special Hattar Shah SPEP
2649	Manager SBP Dargah	Basic authority G.H. Palangar
2650	D.O. Bhuva	de Bie Stationery
2651	D.O. Bhuva	"
2652	GPS Shagan	EXPLANATION
2653-54	All concerned	"

Alia



# Register of Letters Despatched



# رجسٹر ڈاک روانگی

Serial NO. نمبر شمار	Month & Date مہینہ اور تاریخ	Name and Address نام اور پتہ	Place مقام	Subject مضمون	File NO. فائل نمبر	Stamps Received ٹکٹ آمد		Stamps Used ٹکٹ استعمال		Stamps Balanced بقایا ٹکٹ		Remarks کیفیت
						Rs.	Ps.	Rs.	Ps.	Rs.	Ps.	
2655	2/6/23	D. A. D. Bunn		A/C Bill								
2656	"	D. A. D. Bunn		~								
2657	"	Director (L-285) Up.		Request for the grant of Guara 120 judgements said in ABRAR								
2658	to	Secretary										
	"	Additional advice										
	"	"										
2661	"	D. A. D. Bunn		A/C Bill								
2662	"	D. C. Bunn		FINANCIAL ASSISTANTS CASE ABRAR								
2663	"	Director (L-285) Up.		LEGAL CASE MURKIN ABRAR								
2664	"	D. A. D. Bunn		A/C Bill								
2665	"	D. C. Bunn		LEGAL CASE								Attended

Attended

2666 <sup>26</sup> / <sub>23</sub>	RB & DC IGP	RB & DC case in R/A	Shri
2667	D-C Bure	B-Fund case in R/A	Shri
2668	D-C Bure	Guidance regarding	Issuance of GRS
		Depto 100	Terms of Union Council
2669-71	All Council		
<del>2670</del> 2672	D.O Bure	Activation of	Pay Warrant when
2673-76	All Council		
2677-80	All Council	Office order	
2681	D.C Bure	B-Fund case in R/A	2nd Feb when
2682	General University	Issuance of DMC	
2683	University Agri	✓ = DMC	
2684	5/6/14 Directed information	Publication of	Absence note
2685	D.C Bure	B-Fund case in R/A	Late alarm when
2686	EEF IGP	EEF case in R/A	Late alarm when
2687-92	All Council	Sanction of	Leave called when
2693	Syed Bahadur Shik	Shaw-Cause	al-tee
2694	M-Factor RSL	=	
2695	Zakia Shik	=	

Al-tee

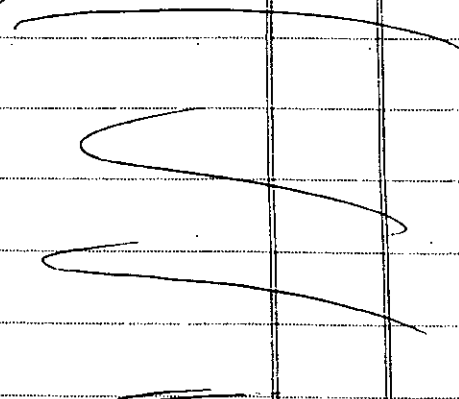
# Register of Letters Despatched



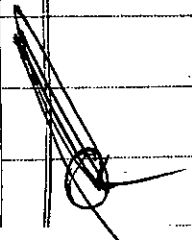
# رجسٹر ڈاک روانگی

Serial NO. نمبر شمار	Month & Date مہینہ اور تاریخ	Name and Address نام اور پتہ	Place مقام	Subject مضمون	File NO. فائل نمبر	Stamps Received ٹکٹ آمد		Stamps Used ٹکٹ استعمال		Stamps Balanced بقایا ٹکٹ		Remarks کیفیت
						Rs.	Ps.	Rs.	Ps.	Rs.	Ps.	
2696	5/6/23	Sahub Zedaj		Show-Cause Notice								
2697		Balchit Hassan										
2698		Didawat (E-25) Lep		Report regarding ABSENTEEISM.								
2699-2703		All concerned		ABSENTEEISM								
2704		Didawat (E-25) Lep										
2705-07		All concerned										
2705-09	5/6/23	E-leave 14 days		Said Hi J/C for Examination.								
2710-14		All concerned		Suspension ORDER.								
2715	7/6/23	Registrar Service Tribunal perwas		Delay in FILING OF PARAWISE COMMENTS walek letter								
2716		D.O. Burea		ARC Bill.								
2717		D.O. Burea		CAC Sanction								

AMK

2718	D.A.O Buner	A-C BIC						
2719	D-A.O Buner	A-C BIC						
2720	Baichu Ray Khan	Show-cause	Active	for	Salary	deduct		
2721	M. Asadul PST	"						
2722	Idamullah PST	"						
2723	Haleem Bahadur PST	"						
2724	Zahid Daq PST	"						
2725	Amir Chahid PST	"						
2726	M. Iqbal PST	"						
2727-31	All concerned	Sanction. CAC.						
2732-38	Director ESSE	Officer Order						
	DC Buner							
	DMO Buner							
	DAO Buner							
	SDSO (Y, and							
	Enms Cell							
	Offis Cell							

AK



OFFICE OF THE DISTRICT EDUCATION OFFICER MALE DISTRICT BUNER

AUTHORITY LETTER

Mr. Ubaid Ur Rahman, Superintendent BPS-17, Office of the District Education Officer Elementary & Secondary Education Buner is hereby authorized to submit reply on behalf of the undersigned in connection with the <sup>Amended</sup> Service Appeal No. 1270/2023 titled Inayat Ullah Versus District Education Officer Male Buner and Others in the Honorable Court of Service Tribunal Khyber Pukhtunkhwa Peshawar.

  
DISTRICT EDUCATION OFFICER  
MALE DISTRICT BUNER