

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

**Service Appeal No: 822/2023**

**Muhammad Faraz Ex-SST District Kohat..... Appellant**

**VERSUS**

**Government of, Khyber Pakhtunkhwa through the Secretary Higher  
Education & others..... Respondents**

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

(1)

**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA  
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**Muhammad Faraz ex-SST District Kohat..... Appellant**

**VERSUS**

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Education & others.....Respondents**

**JOINT PARAWISE COMMENTS ON BEHALF OF RESPONDENTS No: 1 to 3.**

**Respectfully Sheweth,**

The Respondents No. 1-3 submit as under:

**PRELIMINARY OBJECTIONS.**

- 1 ***That*** the Appellant has got no cause of action/locus standai to file the titled appeal before this Honorable Tribunal.
- 2 ***That*** the appellant is not an aggrieved person within the meaning of Article 212 of the constitution of Islamic Republic of Pakistan 1973 read with section-4 of Khyber Pakhtunkhwa service Tribunal Act-1974.
- 3 ***That*** the appellant has concealed material facts from this Honorable Tribunal in the titled appeal on mala-fide regarding the report of absence from duty/mis-conduct No. 4000 dated 23-12-2022 & No. 3308 dated 14-11-2022 of the DEO (M) Kohat on the subject of habitual absence from duty.
- 4 ***That*** the Appellant has not come to this Honorable Court with clean hands as vide letter No. 418 dated 20-02-2022 the HM GHS Shamal Din Karbogha has also reported the matter of absence from duty of the appellant since 01-08-2022 without any leave sanction as evident from the attendance sheet of September 2022 w/r to column-4.
- 5 ***That*** the appeal in hand is based on mala fide intentions for illegal service benefits as formal show cause notices dated 07-11-2019 & 24-08-2021 have been served upon the appellant by the Department.
- 6 ***That*** the matter in hand is barred by law in view of the law of limitation Act 1908.
- 7 ***That*** the case is bad for mis-joinder and non-joinder of the necessary parties to the titled appeal.

- 8 **That** the appellant is a habitual duty absconder & litigant in filing baseless petition against the Department that formal enquiry in compliance of the Notification 07-06-2021 of the DEO (M) Hangu has been conducted & final report was submitted by the committee on 16-06-2021 with the recommendation of re-calling the contractual appointment as SST by the Department.
- 9 That the impugned Notifications dated 14-03-2023 & 31-03-2023 of the Respondents No 1 & 2 are legal & liable to be maintained
- 10 **That** no Departmental Appeal against the above said Notifications has been filed by the appellant to the appellate authority till date against the in action of the Department, hence, got finality under the law.

ON FACTS.

- 1 **That** Para-1 pertains to the service record of the appellant against the SST (B/C) in BPS-16 vide order dated 14-09-2018 with reference to S.No. 6 of the said order & subsequent adjustment against the noted post at GHS Shamal Din District Hangu *attached as Annex-A*.
- 2 **That** Para-2 is incorrect & denied on the grounds that: -
  - a) The appellant has concealed material facts from this Honorable Tribunal in the titled appeal on mala-fide regarding the report of absence from duty/mis-conduct No. 4000 dated 28-12-2022 & No. 3308 dated 14-11-2022 of the DEO (M) Kohat on the subject of habitual absence from duty. *Annex-B*
  - b) The Appellant has not come to this Honorable Court with clean hands as vide letter No. 418 dated 20-09-2022 the HM GHS Shamal Din Karbogha has also reported the matter of absence from duty of the appellant since 01-08-2022 without any leave sanction as evident from the attendance sheet of September 2022 w/r to column-4. *Annex-C*.
  - c) The appeal in hand is based on mala fide intentions for illegal service benefits as formal show cause notices dated 07-11-2019 & 24-08-2021 have been served upon the appellant by the Department. *Annex-D*.
  - d) The appellant is a habitual duty absconder & litigant in filing baseless petition against the Department that formal enquiry in compliance of the Notification 07-06-2021 of the DEO (M) Hangu has been conducted & final report was submitted by the committee on 16-06-2021 with the recommendation of re-calling

the contractual appointment as SST by the Department. *Annex-E*, therefore the plea of the appellant is illegal & liable to be rejected. as each & every civil servant is bound to serve the Department with his utmost honesty for the salary, he is drawing from the Government Treasury.

- 3 *That* Para-3 is incorrect as no cogent proof has been attached by the appellant in support of his plea.
- 4 *That* Para-4 is incorrect as no cogent proof has been attached by the appellant in support of his plea.
- 5 *That* Para-5 is also incorrect as posting & transfer of the appellant is the jurisdiction & competency of the Respondent No. 2 instead of the Respondent No. 3 under the relevant rules of business in vogue
- 6 *That* para-6 is also incorrect & denied on the grounds that the appellant should have been approached to the Respondent No. 3 instead of Respondent No. 2 along with the said complaint against the HM GHS Shamal Din District Hangu.
- 7 *That* para-7 is incorrect & denied as the appellant has been found guilty of willful absence from duty w.e.f 01-09-2022 to 02-12-2022 reported as per by the DEO (C) vide letter dated 14-11-2022 against the said post, being a contractual employee of the Department has 1<sup>st</sup> appointment order No. 590-96 dated 14-09-2018 was withdrawn under the relevant provision of law & rules *attached as Annex-F*.
- 8 *That* para-8 is also incorrect as the act of the Respondent No. 2 with regard to the order dated 14-03-2023, whereby, the 1<sup>st</sup> appointment order dated 14-09-2018 has been withdrawn w.e.f 01-09-2022 on account of absence from duty by the appellant without lawful order of the competent authority.
- 9 That para-9 is correct that the Departmental appeal against the order dated 14-03-2023 has been rejected vide order dated 31-03-2023 by the Respondent No. 1 after due process of law including a chance of personal hearing to the appellant on dated 22-03-2023 prior to the rejection of the appeal of the appellant on 31-03-2023 by the respondent No. 1 *attached as Annex-G & H*.
- 10 *That* para-10 is incorrect as the appellant is not an aggrieved person within the meaning of section-2 of KPK service tribunal Act-1974 read with Article-212 of the constitution of 1973, hence, the appeal in hand deserves rejection on the following grounds inter alia: -

GROUNDS.

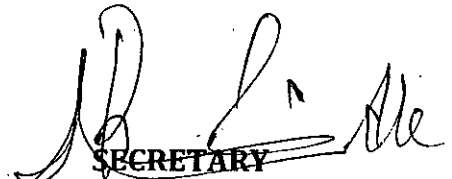
- A. Incorrect & not admitted, the plea of the appellant is illegal on the grounds that both the orders dated 14-03-2023 & 31-03-2023 are legal & liable to be maintained.
- B. Incorrect & not admitted. The act of the Department with regard to the cited orders is legal, furthermore, the appellant was found absent from duty, hence, his contractual job & appointment order was re-called under the rules by the Department.
- C. Incorrect & not admitted. the plea of the appellant is illegal on the grounds that both the orders dated 14-03-2023 & 31-03-2023 are legal & liable to be maintained.
- D. Incorrect & not admitted, the plea of the appellant is against the facts of the case, hence, denied in view of the above made submissions by the Department.
- E. Incorrect & not admitted, the plea of the appellant is against the facts and policy of the case as he was not regularized as SST in BPS-16 under the Act of 2022, hence, his job contract was withdrawn on dated 14-03-2023 by the Department.
- F. Incorrect & not admitted. As replied above.
- G. Incorrect & not admitted, the act of the Department with regard to the above-mentioned orders is legal & liable to be maintained.
- H. Incorrect & not admitted, the act of the Department is legal & even within the constitutional frame work & liable to be maintained
- I. Incorrect & not admitted the appellant was found absent from duty against the said post, hence, removed from service under the rules.
- J. Incorrect & not admitted. As replied above.


**K. Incorrect & not admitted** the appellant has no valid cause of action to file the titled appeal before this Learned Tribunal. Therefore, the Respondents also seek leave of this Honorable Tribunal to submit additional record grounds and case law on the date fixed

**PRAYER:**

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

Dated. \_\_\_/\_\_\_/2023.

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

  
**DIRECTOR**  
E&SE Department Khyber  
Pakhtunkhwa, Peshawar.  
(Respondents No: 2 & 3)

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

**Service Appeal No: 822/2023**


**Muhammad Faraz ex-SST District Kohat..... Appellant**

**VERSUS**

**Government of, Khyber Pakhtunkhwa through the Secretary Higher  
Education & others..... Respondents**

**AFFIDAVIT**

**I, Dr. Hayat Khan Assistant Director (Litigation-II) E&SE Department**  
Khyber Pakhtunkhwa, do hereby solemnly affirm & declare on oath that the contents of  
the instant para wise Comments are true & correct to the best of my knowledge & belief.  
It is further stated on oath that in this appeal the answering Respondents  
have neither been placed Ex-Parte nor their defense has been struck off/cost.

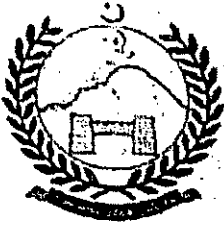
  
**Deponent**

Annex-A

7

Hangu Male Appointment Order SST Adhoc 1 (12)

## Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar



**ATTESTED**

### 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:-

#### (SST Bio Chem)

S#	Roll No.	Name & Father Name	CNIC No.	Address	Academic Score	NTS Marks	Total Score	Name of School
1	111001229	SHAKIR MUHAMMAD S/O UMER KHAN	13101-2229203-7	MOHALLA MATINAY NARYAB TEHSIL THALL DISTRICT HANGU	59.73	73	132.73	GHS Douba
2	291002145	USMAN GHANI S/O SURAT KHAN	14102-0365673-9	MOHALLAH SERO KHEL DARSAMAND TEHSIL THALL DISTRICT HANGU	71.45	57	128.45	GHS Toghaurai
3	291002928	MEHDI RAZA S/O REHSAR HUSSAIN	14101-3251653-9	VILL KHAWALA KHIZER JOUZARA PO LUSTERZAI PAFAN THE DISTT HANGU	64.44	53	119.44	GHS, Raisen
4	181000118	ABDUL SAMAD S/O HASSAN SAHADUR	14101-4356993-5	VILLAGE CHAROLA DISTT HANGU	61.15	57	118.15	GHS Kori Bala
5	181000053	MUHAMMAD ISHFAQ S/O SURAT KHAN	14101-9457867-3	CHARBALA DISTRICT HANGU	61.92	57	117.92	GCMHS, No.1 Hangu
6	211000593	MUHAMMAD FARAZ S/O GULBAT KHAN	14301-1631281-5	SHIND MELA TEHSIL THALL DISTRICT HANGU	54.85	63	117.85	GHS, Shamal Din
7	181000123	DAUD AHMAD S/O SHAHEED GUL	14102-0384180-7	P O KAROGHA SHARIF THALL THE DIST HANGU	58.04	57	115.04	GHS, Miraj Khel
8	291002753	TARIQ KHAN S/O HAJEE GULL	14102-0361105-3	ALLAMA IQBAL HOTEL 9 ROOM 45 UI OF PESHAWAR	67.83	55	122.83	GHS Darsamand
9	181000123	ALAPATAGEEN SHAH S/O TARIQ SHAH	14102-0365415-5	MOHALLA SHANKORI MAIN BAZAR THE THALL DIST HANGU	59.89	54	113.89	GHS Mamoon Banda
10	181000042	RAZA ULLAH S/O MUHAMMAD KHALAQ	14101-1902630-5	Village Shansowon Hangu, Tehsil & District Hangu	56.44	57	113.44	GCMHS NO.1 Hangu
11	181000074	SAJID REHMAN S/O KABEL MAT KHAN	14101-9529658-1	ABDUL JANAN KHAI AUTO STORE NEAR AL IHERANI MASJID TALL RD THE DIST HANGU	61.16	51	112.16	GHS Dorani Banda
12	181000067	IRFAN ULLAH S/O MIR AYAZ	14101-9766774-7	HAFIZ PAINT STORE SAMANA ROAD HANGU	57.15	55	112.15	GHS Chap i Naryab

#### (SST Maths Phy)

S#	Roll No.	Name & Father Name	CNIC No.	Address	Academic Score	NTS Marks	Total Score	Name of school
1	182000042	SAADAT ALI S/O MINHAJ ALI	14101-8919932-7	VILLAGE GANDAWO KALLY HANGU	66.43	57	123.43	GHS, Douba
2	392000371	IMRAN UD DIN S/O SHER BADIN	14101-2866891-5	DIST HANGU TEH THALL V O P SAROZAI MOH	66.1	48	116.1	GHS, Chapri Naryab



**Hangu Male Appointment Order SST Adhoc 2**



Sr	Roll No.	Name & Father Name	CNIC No.	Address	Academic Score	NTS Marks	Total Score	Name of School
3	182000124	ATIF SALEEM S/O NOOR ZADA	14101-6197391-9	SAHIR ZADA FILLING STATION VILLAGE AND PO IKHARA TIBER TILL AND DISTRICT HANGU	59.64	55	114.64	GHS, Dural Banda
4	182000124	FAISAL RIFATIAN S/O NOOR ZAD GUL	14101-1851293-3	AGHARO BANDA HANGU	59.22	55	114.22	GEMHS, No.1 Hangu
5	292001668	WAHID NOOR S/O DALIF NOOR	14102-0347833-7	Mahallah Tandaro Tehsil Thali District Hangu.	59.15	55	114.15	GHS, Maryil Thal
6	182000079	ARSHAD GUL S/O RAJED GUL	14102-0371120-5	VILLAGE PO NURYAN TEHIL TILL DIST HANGU	63.13	51	114.13	GHS, Sharnal Dn
7	182000129	ABID AHMAD S/O GUL AMIR	14102-0361267-5	VILL AND PO DARSAMAND TEH THALI DIST HANGU	61.64	52	113.64	GHS, Dasba

**ATTESTED**

**(SST General)**

Sr	Roll No.	Name & Father Name	CNIC No.	Address	Academic Score	NTS Marks	Total Score	Name of School
1	294002777	BILAL RAZA S/O SAJJAD HUSSAIN	14101-1316035-3	VILLAGE & PO IBRAHIMZAI DISTRICT HANGU	60.50	77	137.50	GEMHS No.1 Hangu
2	213000510	KALEEM ULLAH S/O ATIQ ULLAH	14301-6238910-3	MIRBOK TEHIL & DISTRICT HANGU	65.80	64	129.80	GMS, Sariano
3	184000165	MUHAMMAD RAKOOF S/O SHAH MEHAMOOD	14102-0339222-1	VILL TORA CHUNDI PO TORA WARI TEH TAPALL DIST HANGU	58.39	71	129.39	GHS, Chapri Maryab

**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<sup>th</sup> September 2018 to 19<sup>th</sup> 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 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 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.

**Hanga Male Appointment Order SST Adhoc**

- 15. Before sending your charge sheet your other documents 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

Order No. 590-96 File No. SST Adhoc Appn and Dated Peshawar the 14 /09/2018

Copy forwarded for information and necessary action to:-

- 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 Education Department.
- 7. PA to the Director E&SE Khyber Pakhtunkhwa Peshawar.
- 8. M/File.

*[Signature]*  
 Deputy Director (E&SE)  
 Elementary & Secondary Education  
 Khyber Pakhtunkhwa  
 Peshawar

**ATTESTED**

*[Signature]*

## Hangu Male Appointment Order SST Adhoc

## DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION

Khyber Pakhtunkhwa Peshawar

### APPOINTMENT.

Consequent upon recommendation to the Department 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:-

S#	Roll No.	Name & father Name	CNIC NO.	ADDRESS	Academ ic score	NTS Marks	Total score	Name of school
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2	291002345	Usman Ghani S/o Surat Khan	14102- 0366673-9	MOHALLA SERO KHEL DARSAMAND TEHSIL THALL DISTRICT HANGU	71.45	57	128.45	GHS Togharai
3	291002828	Mehdi Raza S/o Rehbar Hussain	14101- 3851653-9	VILL KHAWAJA KHIZER JAUZARA PO USTERZAI PAYAN THE DISTT HANGU	64.44	55	119.44	GHS Raisan
4	181000118	Abdul Samed S/o Hassan Bahadur	14101- 4356993-5	VILLAGE CHERAOLA DISTT HANGU	61.35	57	118.15	GHS Kotki Dala
5	181000053	Muhamad Ishfaq S/o Surat Khan	14101- 9457887-3	CHERSALA DISTRICT HANGU	61.92	57	117.92	GCMHS No.1 Hangu
6	211000595	Muhammad Faraz S/o Gulbat Khan	14301- 1631261-5	SHINO MILA TEHSIL THALL DISTRICT HANGU	54.85	63	117.85	GHS Shamal Din
7	181000120	Daud Ahmad S/o Shaheed Gul	14102- 0384180-7	P O KARBOGHA SHARIF THALL THE DISTRICT HANGU	58.04	57	115.04	GHS Mian Khel
8	291002753	Tariq Khan S/o Hajee Gull	14102- 0361105-3	ALLAMA IQBAL HOTEL 9ROOM 45 UI OF PESHAWAR	67.83	55	122.83	GHS Daasamand
9	181000123	Alapatageen Shah S/o Tariq Shah	14102- 0365415-5	MOHALLA SHAIKORE MAIN BAZAR THE THALL DISTT HANGU	59.89	54	113.89	GHS Mamoon Banda
10	181000042	Raza Ullah S/o Muhammad Khaliq	14101- 1902630-5	VILLAGE SHAMAOWORA HANGU, TEHSIL & DISTRICT HANGU	56.44	57	113.44	GCMHS No.1 Hangu
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12	181000067	Irfan Ullah S/o Mir Ayaz	14101- 9766774-7	HAFIZ PAINT STORE SAMNA ROAD HANGU	57.15	55	112.15	GHS Chapri naryab

### (SST Maths Phy)

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2	292000371	Imran ud Din S/o Sher Badin	14101- 2886891-5	DIST GANU THE THALL V O P SAROZAI MOH	68.1	48	116.1	GHS Chapri Naryab

**ATTESTED**

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## Hangu Male Appointment Order SST Adhoc 2

AWAL KP PAKISTAN								
3	182000108	Arif Saleem S/o Noor Zada	14101- 0197391-9	SAIRH ZADA FILLING STATION VILLAGE AND PO BOABA TEHSIL THALL AND DISTRICT HANGU	59.64	55	114.64	GHS (sic)
4	182000124	Faisal Rehman S/o Noor Zad Gul	14101- 1861293-3	ASGHARO BANDA HANGU	59.22	655	114.22	GCMHS No 1 Hangu
5	292001668	Wahid Noor S/o Dalif Noor	14102- 034833-7	MOHALLA TANDARO TEHSIL THAL DISTRICT HAGU	59.15	55	114.15	GHS Manju Khe!
6	182000079	Arshad Gul S/o Rajed Gul	14102- 0371120-5	VILLAGE PO NURYAB TEHSIL THAL DIST HANGU	63.13	51	114.13	GHS Shamat Din
7	182000129	Abid Ahmad S/o Gul Amir	14102- 0361267-5	VILL AND PO DARSMAND THE THAL DIST HANGU	61.64	52	113.64	GHSSS Doaba

## (SST General)

S#	Roll No.	Name & father Name	CNIC NO.	ADDRESS	Academ ic score.	NTS Marks	Total score	Name of school
1	294002777	Bilal Raza S/o Sajjad Hussain	14101- 1316035-3	VILLAGE & PO IBRAHIMZAI DISTRICT HANGU	60.50	77	137.50	GCMHS No.1 Hangu
2	213000540	Kaleem Ullah S/o Atiq Ullah	14301- 6238910-3	MIROBAK TEHSIL & DISTRICT HANGU	65.80	64	129.80	GMS, Samana
3	184000165	Muhammad Rawoof S/o Shah Mehmood	14102- 0339222-1	VILL TORA GHUNDI PO TORA WAR THE THALL DIST HANGU	58.39	71	129.39	GHS Chapri Naryab

**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<sup>th</sup> September 2018 to 19<sup>th</sup> 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.
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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 joint his post within 15 days of the issuance of this notification. In case of failure to joint 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.

ATTESTED

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BETTER COPY

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**Hangu Male Appointment Order SST Adhoc 3**

15. Before handing over charge once again, (sic) document maybe annexed if they (sic) required relevant qualification as per rules, they may be (sic) charge of the post.

**(Farid Ahmad Khattak)**

Director

Elementary & Secondary Education

Khyber Pakhtunkhwa Peshawar

Endst: No 590-96/FileNo.1/SST/Adhoc (sic) Dated Peshawar the 14/09/2018

Cop forwarded for information and necessary action to:

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. of Khyber Pakhtunkhwa E&SE Department.
7. PA to the Director E&SE, Khyber Pakhtunkhwa, Peshawar.
8. M/File.

Sd/-

**Deputy Director (Estab.)**

Elementary & Secondary Education

Khyber Pakhtunkhwa

**ATTESTED**



**Office Of The District Education Officer**  
**(Male) District Hangu**

No 4000

Dated 28/12/2022

To

The Director,  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar.

Subject:

**HABITUAL LONG ABSENTEEISM / MISCONDUCT**  
**OF MUHAMMAD FARAZ SST B/C GHS SHAMAL**  
**DIN KARBOGHA HANGU**

Memo

Refer to the subject cited above and reference to the letter No. 3308 dated 14/11/2022. The Head Master now submitted a covering letter along with salary recovery for one month, salary stoppage, and attendance of the teacher after long absence i.e. on 3<sup>rd</sup> December 2022 for further necessary action please.

It is pertinent to mention here that the teacher was not provided duty performance certificate and non involvement certificate as he was absent during regularization (already submitted).

Now he was submitted a covering letter to this office that he has attended the school on 3<sup>rd</sup> December 2022 after long absence i.e. 1<sup>st</sup> September 2022.

Therefore the report and documents received from the Head Master concern, and herewith send to your good self for further necessary action, please.

1690  
-----  
27-2023

District Education Officer  
(Male) Hangu

28/12/2022

Encl No & Dated Even

Copy to the:

1. Deputy Commissioner Hangu.
2. Head Master GHS Shamal Din Karbogha.
3. Office Copy.

سید

District Education Officer  
(Male) Hangu

11

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) HANGU

No. 3308

Dated: 14 /11/2022

To, Director,  
Elementary & Secondary Education,  
Khyber Pakhtunkhwa Peshawar.

ADDE (M)

Subject: HABITUAL LONG ABSENTISM/MISCONDUCT OF MUHAMMAD FARAZ SST (BIO&CHEM) GHS SHAMAL DIN KARBOGHA HANGU

Memo:

Enclosed please find herewith original applications submitted by Head Master concerned signed by staff and PTC members and also the letter submitted by Ex-DEO Male Hangu to your good office regarding misconduct/absence of the teacher. The teacher is absent w.e.f 01-09-2022 upto date and also indulge in misconduct. The Head of the school was called to the office alongwith PTC members to resolve the matter. On the eve of regularization, the teacher submitted an application to the undersigned that he is not allowed to school by the Head Master and he may be transferred. The Head Maser was reluctant to sign/issue duty performance certificate to the teacher and to attest his documents. His plea was that he has been absent for the last two months. How duty performance certificate I can issue. Now AC Hangu dialed me to stop his pay, but I told that his Head is DDO and can stop it. On asking I was told that source two has already been submitted to Account office for stoppage of pay but was not acted upon. I told I/C of the school and AC Hangu to resubmit source two and gets countersign from the undersigned for stoppage of pay.

Keeping in view, the previous record/letter of Ex-DEO for withdrawal of his contract and new absentee applications by the Head Master, teachers, PTC members and aggressive mode of the community is submitted for strict n/ action/withdrawal his contract.

Enclosures :

- 1). Absentism of Muhammad Faraz by Head Master.
- 2). 2nd application Absentism of Muhammad Faraz by Head Master
- 3). Attendance register copies
- 4). Recommendation for discontinuation of contract by the then DEO Male Hangu
- 5). HM application of absentism
- 6). IMU reports of absentism
- 7). Deduction report two times.
- 8). Pay restoration letter.
- 9). Teacher application for resolving the matter.

Encls No. & Date as above.

Copy of the above is forwarded to the:-

1. Deputy Commissioner Hangu
2. Head Master GHS Shamal Din Karbogha
3. Office copy

District Education Officer  
Male Hangu

8/11/2022

District Education Officer  
Male Hangu

DDM-I

*[Handwritten signature]*  
16-11-2022

159  
16-11-22

764  
15/11/22

*[Handwritten signature]*

12

OFFICE OF THE HEAD MASTER GHS  
SHAMAL DIN KARBOGHA SHARIF (HANGU)

(7/9)  
(52)  
76

To

The DEO (M) Hangu,

Subject: Absentee of Muhammad Faraz SST(B/C)

Respected Sir;

With due respect I want to bring in your kind attention that Muhammad Faraz SST(B/C) GHS Shamal Din Karbogha Sharif has been absented since 1<sup>st</sup> September 2022 without any application. This is the third time that he made this mistake. A photocopy of Mr. Muhammad Faraz's absentee is attached with application.

Therefore it is requested from your kind authority to take necessary action against him.

Dated: 28<sup>th</sup> September 2022

Yours sincerely,

From: Muhammad Faraz  
Office of the Head Master  
GHS Shamal Din Karbogha Sharif  
Hangu

No 1118 Dated 20/09/2022

Signature

Muhammad Faraz

Chairman PTC

Mushtari Khan

PTC Members

Sabeel Gul M. Farooq M. Azam

14/11/2022  
on asking reviewed to me on 14-11-2022  
12: PM. without doing No. 1118  
14/11/2022

Teachers of concern school

Khadija Rahman Fazliah Shahid

Rabza Tullah Jam Shad Khan

Rabman ud Din M. Gulzar

Mushtari Khan

M. Shad Gul

Amanullah

Uzma Khan

Mosam Gul

Hamidullah

Muhammad Shad

Hassan Muhammad

class IV Shabeel Gul Saboor Gul



# TEACHER'S ATTENDANCE REGISTER

For the month of September 2022

No. (01) No. (2) No. (3) No. (4)

Name: مسترفاز محمد ارشد گل مروان الرحمن خلیل جناب احمد ستار

Designation: SST (G) SST (G) SST (Se) SST (Se)

Date	Arr.	Sig.	Dep.	Sig.	Arr.	Sig.	Dep.	Sig.	Arr.	Sig.	Dep.	Sig.	Arr.	Sig.	Dep.	Sig.
1	7:30	Sci	1:00	Sci	7:30	14:35	14:35	7:30	AD	11:35	AD					
2	7:30	Sci	1:35	Sci	7:30	14:35	11:15	14:35	7:30	AD	11:15	AD				
3	7:30	Sci	1:35	Sci	7:30	14:35	14:35	7:30	AD	1:35	AD					
4																
5	7:30	Sci	1:35	Sci	7:30	14:35	1:35	14:35	7:30	AD	1:35	AD				
6	7:30	Sci	1:35	Sci	7:30	14:35	14:35	7:30	AD	1:35	AD					
7	7:30	Sci	1:35	Sci	7:30	14:35	14:35	7:30	AD	1:35	AD					
8	7:30	Sci	1:35	Sci	7:30	14:35	14:35	7:30	AD	11:35	AD					
9	7:30	Sci	1:35	Sci	7:30	14:35	11:15	14:35	7:30	AD	11:15	AD				
10	7:30	Sci	1:35	Sci	7:30	14:35	14:35	7:30	AD	1:35	AD					
11																
12	7:30	Sci	1:35	Sci	7:30	14:35	14:35	7:30	AD	1:35	AD					
13	7:30	Sci	1:35	Sci	7:30	14:35	14:35	7:30	AD	1:35	AD					
14	7:30	Sci	1:35	Sci	7:30	14:35	14:35	7:30	AD	1:35	AD					
15	7:30	Sci	1:35	Sci	7:30	14:35	14:35	7:30	C.I.C							
16	7:30	Sci	11:30	Sci	7:30	14:35	11:15	14:35								
17	7:30	Sci	1:35	Sci	7:30	14:35	14:35									
18																
19																
20	7:30	Sci	1:35	Sci	7:30	14:35	14:35	7:30	AD	1:35	AD					
21	7:30	Sci	1:35	Sci	7:30	14:35	14:35	7:30	AD	1:35	AD					
22	7:30	Sci	1:35	Sci	7:30	14:35	14:35	7:30	AD	1:35	AD					
23	7:30	Sci	11:15	Sci	7:30	14:35	11:15	14:35	7:30	AD	11:15	AD				
24	7:30	Sci	1:35	Sci	7:30	14:35	14:35	7:30	AD	1:35	AD					
25																
26	7:30	Sci	1:35	Sci	7:30	14:35	14:35	7:30	AD	1:35	AD					
27	7:30	Sci	1:35	Sci	7:30	14:35	14:35	7:30	AD	1:35	AD					
28	7:30	Sci	1:35	Sci	7:30	14:35	14:35	7:30	AD	1:35	AD					
29	7:30	Sci	1:35	Sci	7:30	14:35	14:35	7:30	AD	1:35	AD					
30	7:30	Sci	1:35	Sci	7:30	14:35	11:15	14:35	7:30	AD	11:15	AD				
31																

STATEMENT OF LEAVES TAKEN.

This month.	Sick				Casual				Pri				Total			
	Sick	Casual	Pri	Total	Sick	Casual	Pri	Total	Sick	Casual	Pri	Total	Sick	Casual	Pri	Total

14



181  
82

Government of Khyber Pakhtunkhwa  
Directorate of Elementary & Secondary Education

File No: \_\_\_\_\_  
Dated: \_\_\_\_\_

Show-cause Notice for Salary Deduction

I, Dr. Hafiz Muhammad Ibrahim, Director Elementary & Secondary Education, Khyber Pakhtunkhwa as Competent Authority, under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 do hereby serve upon you (muhammad faraz, SST (Bio-Chem), GHS SHAMAL DIN KARBOGHA(EmisCode:37645)) this show cause as follows.

1. That as per IMU monitoring report you were found absent from duty on 21/10/2019 without prior permission of the competent authority.
2. And that as per the material and other connected papers on record under Rule-5 (i) (a) and to dispense with the inquiry in accordance with Rule-7 of the aforementioned rules, I, the competent authority, am satisfied that you have committed acts/omissions specified in Rule-3 (d) i.e. "guilty of habitually absenting himself from duty without prior approval of leave".
3. Now, therefore, I as the Competent Authority have tentatively decided to deduct one-day salary in accordance with Rule-4 (a) (iii) and the Finance Department Notification No. So (FR)/FD/5-14/2014 dated 16-12-2014.
4. You are, therefore, required to show cause as to why the aforementioned penalty should not be imposed upon you and also intimate whether you desire to be heard in person.
5. If no reply to this show cause is received within 7 days of its delivery, it shall be presumed that you have no defense to put in and in that case an Ex-Parte decision shall be taken against you.

Director (E&SE)  
Khyber Pakhtunkhwa

5799-5800

Encls: Exen No. & Date

07-11-19

Copy of the above is forwarded to the: -

- i. Principal/Headmaster/Headmistress/DDEO/SDEO concerned for necessary action under intimation to this office within 7 days.
- ii. muhammad faraz, SST (Bio-Chem), GHS SHAMAL DIN KARBOGHA(EmisCode:37645), KARBOGHA SHARIF, THALLI, HANGU
- iii. Master File

Director (E&SE)

By Director (E&SE)  
Khyber Pakhtunkhwa - Show-cause Notice

Received by Naeem ur Rahman SST (Bio-chem)  
on 18-11-2019 at 4:30 PM

*(Signature)*  
18/11/2019

15

31

SP  
44

Government of Khyber Pakhtunkhwa  
Directorate of Elementary & Secondary Education

File No: \_\_\_\_\_  
Dated: 24/08/2021

Show Cause Notice for Salary Deduction

To: Muhammad Ibrahim, Director Elementary & Secondary Education, Khyber Pakhtunkhwa as Competent Authority, under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Act, 2011 do hereby serve upon you (muhammad faraz, SST (Bio-Che), GHS SHAMAL-DIN KARBOGHA(EmisCode:37645)) this show cause as follows.

1. That as per IMU monitoring report you were found absent from duty on 05/07/2021 without prior permission of the competent authority.  
And that as per the material and other connected papers on record under Rule-5 (i) (a) and to dispense with the inquiry in accordance with Rule-7 of the aforementioned rules, I, the competent authority, am satisfied that you have committed acts/omissions specified in Rule-3 (d) i.e. "guilty of habitually absenting himself from duty without prior approval of leave".  
Now, therefore, I as the Competent Authority have tentatively decided to deduct one-day salary in accordance with Rule-4 (a) (iii) and the Finance Department Notification No. So (FR)/FD/5-14/2014 dated 16-12-2014.
2. You are, therefore, required to show cause as to why the aforementioned penalty should not be imposed upon you and also intimate whether you desire to be heard in person.  
If no reply to this show cause is received within 7 days of its delivery, it shall be presumed that you have no defense to put in and in that case an Ex-Parte decision shall be taken against you.

Director (E&SE)

Endst: Even No. & Date

35/11/21

The above is forwarded to the:-

- i. Principal/Headmaster/Headmistress/DDEO/SDEO concerned for necessary action under intimation to this office within 7 days.
- ii. muhammad faraz, SST (Bio-Che), GHS SHAMAL DIN KARBOGHA(EmisCode:37645), KARBOGHA SHARIF, THALL, HANGU
- iii. Master File

Director (E&SE)

Director (E&SE)  
Khyber Pakhtunkhwa - Show-cause Notice

④

**Office Of The District Education Officer**  
**(Male) District Hangu.**

No 6141

Dated Hangu the/ 16/06 2021.

To

The District Education Officer  
(Male) Hangu

**SUBJECT: ENQUIRY REPORT**

**ATHORITY:** District Education Officer(M) Hangu

**MEMO:**

Reference to the complaint received from Incharge Headmaster GHS Shamal Din Karbogha dated: 07-06-2021 and further marked by DEO(M) Hangu.

**PROCEDURE:**

The Incharge Headmaster of the school was directed to ensure the presence of both the teachers under complaint day before the scheduled visit. I along with Mr. Raham Jan ADEO(Sec:) visited the school on 10-06-2021 to enquire the matter in detail and to know the facts and figure for final decision. In the complaint it was mentioned that the two teachers Mr. Muhammad Faraz SST(B/C) and Khalil ur Rehman SST(G) are not regular in school duty. They remain absent from the school and do not follow the directions of the Incharge Headmaster. Both the mentioned teachers were absent on the day of visit of the school. Incharge Headmaster, teaching and non teaching staff, students of Class 9th & 10th and the PTC members were interrogated regarding the mentioned subject. After detail discussion and interrogation with different stakeholder the following findings were noted.

**FINDINGS:**

1. As per the statement of the Incharge Headmaster of the school, PTC Chairman and members, Class 9th students, and Class 10th students, Mr. Muhammad Faraz SST(B/C) remained willful absent from school w.e.f. 28-05-2021 till the date of visit.
2. Incharge Headmaster of the school stated that Mr. Khalil ur Rahman SST(G) refused to take classes of the concerned level 9th & 10th, which is his main job description. Being SST(G) he does not accept his own responsibility. (Annex-A).
3. According to the statements of PTC Chairman and members, both the teachers Mr. Muhammad Faraz and Khalil Ur Rehman are neither regular nor taking any interest in the teaching/learning process of the school.(Annex-B)
4. The students of Class 9th and 10th gave written statement that both the above mentioned teachers did not take any class w.e.f. 24-05-2021 till date (i.e. 10-06-2021). (Annex-C)
5. Both the above mentioned teachers were marked absent in the staff attendance register since 24-05-2021. (Annex-D)

**CONCLUSION AND RECOMMENDATIONS:**

In the light of above facts and figure, one Mr. Muhammad Faraz SST(B/C), who remained willful absent from his duty. Being NTS teacher, his contract may be discontinued and the case may be submitted to Director E&SE, Khyber Pakhtunkhwa, Peshawar.

Where Mr. Khalil Ur Rehman SST(G) is not regular. Therefore, he may be transferred to GHS Thall and at least two increments may be deducted for two years.

Mr. Muhammad Raham Jan  
Member  
ADEO(Sec:) o/o DEO(M) Hangu

Nisar Ahmed  
Enquiry Officer  
Dy. DEO(M) Hangu.

15/06/2021

12

AAC-10

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Amir I



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

**OFFICE ORDER**

The Competent Authority (Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar) has been pleased to withdraw the contract based appointment Order bearing No. 590-96 dated 14-09-2015 of District Hangu to the extent of Muhammad Araz SST (Bio/Chem) GHS Shamal Din District Hangu due to willful absence/misconduct as per condition No. 13 of his appointment order & read with rule 11(ii) of Khyber Pakhtunkhwa Civil Service Act 1973 w.e.f 01-09-2022 to 02-12-2022 as reported by DEO (M) Hangu vide letter No. 3308 dated 14-11-2022, in the interest of public service.

**DIRECTOR**  
Elementary & Secondary Education  
Khyber Pakhtunkhwa

Encls. No. 8296-18 F. NO. 210/SST (M) Disciplinary Action Hangu - Dated 14-11-2022

Copy forwarded to the:

1. District Education Officer (M) Hangu
2. District Accounts Officer Hangu
3. Principal GHS Shamal Din Hangu
4. Ex-SST Concerned.
5. Master Copy.

Assistant Director (Eship-ME)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa

**ATTESTED**

25

BETTER COPY

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

**OFFICE ORDER:**

The competent authority (Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar) has been pleased to withdraw the contract based appointment Order bearing No.590-96 dated:14.09.2015 of District Hangu to the extent of Muhammad Faraz SST (Bio/Chem) GHS Shamal Din District Hangu due to willful absence/ misconduct as per condition No.13 of his appointment order & read with rule 11(ii) of Khyber Pakhtunkhwa civil servant act 1973 w.e.f. 01.09.2022 to 02.12.2022 as reported by DEO (M) Hangu vide letter No.3308 dated 14.11.2022, in the interest of public service.

Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa

Endst: No.8296-98 F.No.210/SST (M)/Disciplinary Action Hangu Dated the Peshawar 14.03.2023

Copy forwarded to the;

1. District Education Officer (M) Hangu.
2. District Accounts Officer Hangu.
3. Principal GHS Shamal Din Hangu
4. Ex-SST Concerned.
5. Master Copy.

Sd/-  
**Assistant Director (Estab M-I)**  
Elementary & Secondary Education  
Khyber Pakhtunkhwa

**ATTESTED**





ANNEX  
27  
19

**GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT  
CIVIL SECRETARIAT PESHAWAR  
(PHONE NO. 091-4223587)**

No.80 (Primary-Male)/E&SE/19/Rs-Instatement/2023  
Dated Peshawar the 14.03.2023

To

Mr. Muhammad Faraz,  
SST(Bio/Chem), GHS Shamal Din,  
District Hangu.

→ EOM  
14.3.23

Subject - **PERSONAL HEARING**

I am directed to refer to this department letter No.8 dated even on the subject noted above and to state that your personal hearing is re-scheduled to be held on 22.03.2023 at 11:00 AM with Additional Secretary (Estt.), Elementary & Secondary Education Department Khyber Pakhtunkhwa in his office.

2. You are, therefore, directed to appear before Additional Secretary (Estt.) Elementary & Secondary Education Department Khyber Pakhtunkhwa for a personal hearing along with complete documents, on the date, time and venue mentioned above.

(MUHAMMAD ISHAQ) 14/3/23  
SECTION OFFICER (PRIMARY MALE)

Encl: No & date even

Copy forwarded to the: -

1. Director Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar, with the request to depute a well conversant representative to attend the personal hearing as mentioned above, along with complete record pertaining to the case.
2. District Education Officer (M) Hangu, with the direction to attend the aforementioned personal hearing along with all relevant documents on the date, time and venue mentioned above.
3. PS to Secretary E&SE Department Khyber Pakhtunkhwa.
4. PA to Additional Secretary (Establishment) Elementary & Secondary Education Department Khyber Pakhtunkhwa.
5. Concerned File.

(MUHAMMAD ISHAQ) 14/3/23  
SECTION OFFICER (PRIMARY MALE)

**ATTESTED**  
AT



Amr B

(P)

(20)



**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
CIVIL SECRETARIAT PESHAWAR  
(Phone No.091-9223587)


No. SO(Primary-M)E&SED/5-19/2023/Reinstatement/Muhammad Faraz/SST/Hangu  
Dated Peshawar the March 31<sup>st</sup>, 2023

To

Muhammad Faraz,  
SST (Bio/ Chem),  
GHS Shamal Din, Hangu.

Subject: PERSONAL HEARING REGARDING REINSTATEMENT INTO SERVICE.

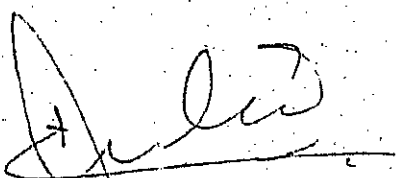
I am directed to refer to personal hearing held on 28-03-2023 at 11:00 AM in this department regarding your appeal for reinstatement whereby your appeal was considered and rejected by the Competent Authority.

  
(ARSALAN AHMED)  
SECTION OFFICER  
(PRIMARY MALE)

Endst: of even No. & Date:

Copy forwarded to the:

1. PS to Secretary, Elementary & Secondary Education Department.
2. PA to Additional Secretary (Estab), Elementary & Secondary Education Department.
3. PA to Deputy Secretary (AB), Elementary & Secondary Education Department.

  
SECTION OFFICER  
(PRIMARY MALE)

**ATTESTED**

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICES  
TRIBUNAL PESHAWAR

Service Appeal No .822/2023

MUHAMMAD FARAZ.....Appellant

VERSUS

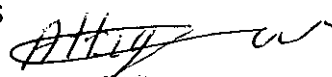
Govt. Of Khyber Pakhtunkhwa & others through Secretary  
Elementary & Secondary Education Department &  
others.....Respondents

INDEX

S#	Description of the Documents	Annex	Pages
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Dated:- 11/07/2023

Respondents

  
District Education Officer  
(Male)  
District Hangu

b

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICES  
TRIBUNAL PESHAWAR

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 6400

Dated 12/07/23

Service Appeal No .822/2023

MUHAMMAD FARAZ.....Appellant

VERSUS

Govt. Of Khyber Pakhtunkhwa & others through Secretary  
Elementary & Secondary Education Department &  
others.....Respondents

PARA WISE COMMENTS ON BEHALF OF RESPONDENTS NO.

01.02 & 03

That the Respondents submitted as under

Respectfully Sheweth

Preliminary Objections:-

- I. That the appellant has got no cause of action / locus standi to file the instant Service Appeal, because neither any wrong has been done nor any vested right of the appellant has been infringed.
- II. The appellant is estopped by his own conduct to file the instant Service Appeal.
- III. The appellant has not come to this Hon'ble Tribunal with clean hands and deliberately concealed material facts from this Hon'ble Tribunal, hence disentitled for any relief whatsoever.
- IV. That the instant Service Appeal is based on mala-fide intentions just to get unlawful benefits from the Answering Respondents. The present Service Appeal has been filed to entangle the Department in unnecessary litigation and to waste the precious time of the Answering Respondents as well as of this Hon'ble Tribunal.

V. That the appeal is barred by law and limitation.

ON FACTS

1. That Para-01 pertains to record.
2. That Para-02 is incorrect/not admitted, strongly denied. That the appellant remained willful absent from his official duty. The appellant himself submitted an application to the Head Master of GHS Shamal Din Karbogha, Hangu, whereas he himself admitted that without prior permission / submitted an application for leaves to the concerned from his official duty w.e.f 01-09-2022 to 02-12-2022. (Annex- A)
3. That Para-03 is incorrect/ not admitted, strongly denied and misleading. The appellant again submitted an application to the District Education Officer (Male) Hangu, wherein, he himself admitted that all the allegations leveled by him on Headmaster was baseless and based on mala-fide intensions. Hence, withdraw his complaint on 09-12-2022. It is further submitted that the Headmaster GHS Shamal Din Karbogha, Hangu endorsed / forwarded the application of the appellant to the DEO (M) Hangu, with the remarks that the appellant remained willful absent from his official duty w.e.f 01-09-2022 to 02-12-2022. The against appellant himself submitted the pay of September 2022 to the Government exchequer with the confession of willful absent. *Annex B*
4. That Para-04 is incorrect / not admitted and misleading. No such incident was ~~took~~<sup>taken</sup> place

official duty. Hence, the story narrated in this Para of the Service Appeal is the appellant self-made. The Respondent Department contacted with the School Headmaster and the school Headmaster said that it is self-made story of the appellant, that the brother of the appellant did not attended the office of the Headmaster GHS Shamal Din Karbogha, Hangu. (Annex-C)

5. That the application filed by the appellant were forwarded to the Director E&SE Khyber Pakhtunkhwa, Peshawar for further process being Competent Authority. (Annex-D)
6. That Para-06 is incorrect / not admitted and strongly denied. As explained in Para-05 of the Facts.
7. That Para-07 is incorrect / not admitted and misleading as explained in Para-4 of the facts.
8. That Para-08 is incorrect and misleading. That the appellant is dealt an accordance with law, rules and regulation. In this regard a letter dated 14-11-2022 was forwarded to the Director E&SE Khyber Pakhtunkhwa being Competent Authority by Office of the District Education Officer (Male) Hangu, wherein, it is clearly mentioned that, the appellant is habitual leave hunter without prior permission of the Headmaster w.e.f 01-09-2022 and also indulge in misconduct. (Annex-E)
9. That Para-08 is incorrect and misleading. That the appellant is dealt an accordance with law, rules and regulation. It is clearly mentioned in the appointment order terms and condition in Serial No. 13 **"his contract shall be discontinued at any time, in case his performance is found unsatisfactory.** (Annex-F)
10. Incorrect, the appellant have been dealt in accordance with Law, Rules and laid down procedure, now at this bilateral stage the appellant have no right to approach this Hon'ble Tribunal. Hence, the instant Service Appeal is liable to be dismissed inter-alia on the following grounds.


### GROUND.

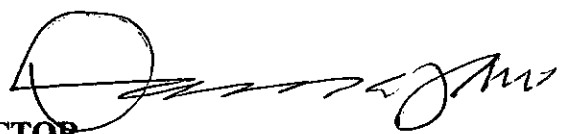
- A. The statement of the Appellant is against the facts and circumstances of the case, as the appellant have been treated as per Law & Rules.
- B. Incorrect & denied. As explained in Para-08 of the facts.
- C. That so ever has been done, was in accordance with law, rules and policy and no vested right of the appellant is violated. As explained in Para-09 of the facts.
- D. Incorrect & denied. As explained in Para-08 of the Facts. Respondents departments have fully complied with the policy/ Law. The impugned Notification/ order of the Respondent is within legal sphere and is liable to be maintained.
- E. That so ever has been done, was in accordance with law, rules and policy and no vested right of the appellant is violated. As explained in Para-09 of the facts.
- F. Incorrect & denied. As explained in Para-06 of the Facts. Respondents departments have fully complied with the policy/ Law. The impugned Notification/ order of the Respondent is within legal sphere and is liable to be maintained.
- G. Incorrect & denied. It is clearly mentioned in the appointment order terms and condition in Serial No. 13 **"his contract shall be discontinued at any time, in case his performance is found unsatisfactory.**

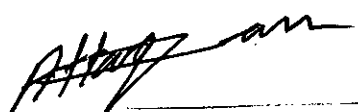
- H. Incorrect & denied. That the appellant is not an aggrieved person within the meaning of Article 199 of the Constitution of Islamic Republic of Pakistan 1973.
- I. Incorrect and denied. As explained the appellant remained wilful absent from his official duty w.e.f 01-09-2022 to 02-12-2022. The appellant himself submitted the pay of September 2022 to the Government exchequer and also indulge in misconduct.
- J. Incorrect & denied. As explained in Para-06 of the Facts. Respondents departments have fully complied with the policy/ Law. The impugned Notification/ order of the Respondent is within legal sphere and is liable to be maintained.
- K. Incorrect and denied. As explained in Para-06 of the Facts.

**In view of the above made submissions, it is therefore, most humbly prayed that this Hon'ble Tribunal may very graciously be pleased to dismiss the instant Service Appeal.**

**RESPONDENTS**

  
**1. SECRETARY to Govt;**  
 Elementary and Secondary Education Department, Khyber  
 Pakhtunkhwa, Peshawar.  
 Respondent No.1

  
**2. DIRECTOR,**  
 Elementary and Secondary Education Department, Khyber  
 Pakhtunkhwa, Peshawar.  
 Respondent No.02

  
**3. DISTRICT EDUCATION OFFICER (MALE)**  
 DISTRICT HANGU  
 Respondent No.03

- H. Incorrect & denied. That the appellant is not an aggrieved person within the meaning of Article 199 of the Constitution of Islamic Republic of Pakistan 1973.
- I. Incorrect and denied. As explained the appellant remained absent from his official duty w.r.t. 01-09-2012 to 02-12-2012. The appellant himself submitted the pay of September 2012 to the Government & denied and also indulged in misconduct.
- J. Incorrect & denied. As explained in Para-06 of the Facts Respondents departments have fully complied with the policy Law. The impugned Notification order of the Respondent is within legal sphere and is liable to be maintained.
- K. Incorrect and denied. As explained in Para-06 of the Facts.

In view of the above made admissions, it is therefore, most humbly prayed that this Hon'ble Tribunal may very graciously be pleased to dismiss the instant Service Appeal.

**RESPONDENTS**

1. SECRETARY to Govt.  
 Elementary and Secondary Education Department, Khyber  
 Pakhtunkhwa, Peshawar.  
 Respondent No. 1.

2. DIRECTOR  
 Elementary and Secondary Education Department, Khyber  
 Pakhtunkhwa, Peshawar.  
 Respondent No. 02.

3. DISTRICT EDUCATION OFFICER (MALE)  
 DISTRICT HANGU  
 Respondent No. 03.

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR

Service Appeal No .822/2023

MUHAMMAD FARAZ.....Appellant

VERSUS

Govt. Of Khyber Pakhtunkhwa & others through Secretary Elementary & Secondary Education Department & others.....Respondents

AFFIDAVIT

I, Muhammad Nawaz ADEO (BPS-17) Government of Khyber Pakhtunkhwa Education Department, District Hangu, do hereby solemnly affirm and declare on oath that the contents of this accompanying Para Wise Comments on behalf of respondents No 1, 2 & 3 are true and correct to the best of my knowledge and belief and nothing has been concealed from this

Honourable Tribunal. It is further stated on oath in this appeal. The answering respondents have neither been placed ex-parte nor there defence has been struck off.

DEPONENT  
CNIC No:- 14101-6348419-  
Cell No:- 0332-9612550

**ATTESTED**



2-07-2023



Annex A

(6)

Shamail Din Karibozha

بخدمت جناب ہیڈ ماسٹر - صاحب ضلع ہنگو

End # 427

جناب عالی!

Ahead  
Office  
with  
covering  
letter

جناب صاحب ضلع ہنگو انور یہ ہے۔ کہ بندہ جی ایچ ایس شامل دین کر بوغہ شریف میں اپنے فرائض سرانجام دے رہا ہے۔ گزشتہ تین ماہ سے یعنی یکم ستمبر 2022 تا 2 دسمبر 2022 سے بندہ کچھ ناگزیر حالات کی وجہ سے

ہیڈ ماسٹر صاحب سے باقاعدہ طور پر اجازت لے لی ہے بغیر غیر حاضر رہا۔

لہذا آپ کی خدمت میں استدعا ہے کہ بندہ کی معذرت قبول فرما کر اس کی غیر حاضریاں with out pay چھٹیوں میں تبدیل کر دیا جائے۔ انشاء اللہ بندہ آئندہ اپنی ڈیوٹی کو ایمظرداری سے سرانجام دینے کی کوشش کریگا۔

عین نوازش ہوگی

مورخہ 09-12-2022

العابض

آپ کا مخلص محمد فراز SST BIO CHEM سکول ہذا۔

Forwarded to the D.E.O (M) Hangu

CNIC: for further necessary action with the remarks that the applicant has attended the school on 2nd December 2022 after long absence i.e 1st September

Phone No: 2022 to 2nd December 2022 and has

deposited the pay of September 2022.

The pay of October 2022 and November 2022 already stopped.

Receipt No. account C.02814 is attached.

CNIC: 14301-1631261-5  
Phone: 0335-9450070

Attested by

ADEO (Litigation)  
DEO (M)  
Hangu

9-12-2022  
HEAD MASTER  
G.J.S. Sh. mal Dio  
Kar Hangu

7  
Annex B  
خدمت جناب ڈی ای او صاحب ضلع ہنگو

جناب عالی!

التماس بحضور انوریہ ہے۔ کہ بندہ نے ہیڈ ماسٹر صاحب اور پی ٹی سی کمیٹی جی ایچ ایس شمل دین کر بوغہ کے خلاف غلطی کی بنیاد پر دفتر ہذا میں درخواست جمع کر دیا تھا۔ کہ وہ بندہ کو اپنے فرائض سرانجام دینے کے لئے نہیں چھوڑتے ہیں۔ بندہ اُس درخواست کو واپس لیتا ہے میں نے غلط بیان کی لہذا استدعا کیجاتی ہے کہ بندہ کو معذور سمجھ کر ہیڈ ماسٹر صاحب اور پی ٹی سی کمیٹی کے خلاف کسی قسم کی کارروائی نہ کریں عین نوازش ہوگی

مورخہ 09/12/2022

العارض  
آپ کا مخلص محمد فراز

SST BIO CHEM سکول ہذا۔

CNIC: 14301-1631261-5

Phone No: 0335-9450070

Attested by

ADEO (Litigation)  
DEO (M)  
Hangu

8

Annex C

APPLICATION TO THE DEO FOR RESOLVING THE MATTER

To,  
the DEO  
district education officer  
Hangu.

**SUBJECT:** Application for resolving the matter.

Dear Sir,

It is stated that I have posting in GHS Shamaldin karbogha Hangu. There was exchange of harsh words between me and the headmaster that night. I came home and the next day my brother and cousin went school to apologize. The headmaster told him that the parent teacher council chairman told me and threatened about him not to come to school. If he comes to school and is killed, we will not be responsible. I also want to say that I am under the Parent teacher council chairman or head master that he says to me not come to school on the request of parent teacher council. I will be grateful to you to resolve the matter.

Sincerely Yours,  
Muhammad Faraz  
SST (Bio/Chem)



GHS Shamaldin karbogha Hangu

Date: 27/10/2022

Place: Billitang, Kohat

Dy. DEO  
Call to office P.M or tomorrow.  
Attend this by 3:00  
H.M

27/10/22

Attested by  
ADeo (Estab)  
Put up on file  
27/10/22

  
ADEO (Litigation)  
DEO (M)  
Hangu

(26)

Annex - F

ذیل کے بیان کردہ امور کے متعلق درخواستیں کی گئی ہیں۔

- مکمل

نوٹ: 15/09/2018

1. مقامی سطح پر کی درخواستیں منظور کی جائیں۔

2. مقامی سطح پر کی درخواستیں منظور کی جائیں۔

3. مقامی سطح پر کی درخواستیں منظور کی جائیں۔

4. مقامی سطح پر کی درخواستیں منظور کی جائیں۔

5. مقامی سطح پر کی درخواستیں منظور کی جائیں۔

6. مقامی سطح پر کی درخواستیں منظور کی جائیں۔

7. مقامی سطح پر کی درخواستیں منظور کی جائیں۔

8. مقامی سطح پر کی درخواستیں منظور کی جائیں۔

9. مقامی سطح پر کی درخواستیں منظور کی جائیں۔

10. مقامی سطح پر کی درخواستیں منظور کی جائیں۔

ATTESTED

14/03/2018

CHS Liaison Dir Dign. Hangu

Attested by

ABEO (Liaison)

DEO (M)

Hangu

(10)

Annex E



**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) HANGU**

No. 3308

Dated: 14 /11/2022

To,  
Director,  
Elementary & Secondary Education,  
Khyber Pakhtunkhwa Peshawar.

Subject: HABITUAL LONG ABSENTISM/MISCONDUCT OF MUHAMMAD FARAZ SST (BI0&CHEM) GHS SHAMAL DIN KARBOGHA HANGU

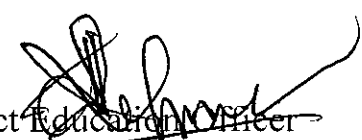
Memo:

Enclosed please find herewith original applications submitted by Head Master concerned signed by staff and PTC members and also the letter submitted by Ex-DEO Male Hangu to your good office regarding misconduct/absence of the teacher. The teacher is absent w.ef 01-09-2022 upto date and also indulge in misconduct. The Head of the school was called to the office alongwith PTC members to resolve the matter. On the eve of regularization, the teacher submitted an application to the undersigned that he is not allowed to school by the Head Master and he may be transferred. The Head Maser was reluctant to sign/issue duty performance certificate to the teacher and to attest his documents. His plea was that he has been absent for the last two months. How duty performance certificate I can issue. Now AC Hangu dialed me to stop his pay, but I told that his Head is DDQ and can stop it. On asking I was told that source two has already been submitted to Account office for stoppage-of pay but was not acted upon. I told I/C of the school and AC Hangu to resubmit source two and gets countersign from the undersigned for stoppage of pay.

Keeping in view, the previous record/letter of Ex-DEO for withdrawal of his contract and new absentee applications by the Head Master, teachers, PTC members and aggressive mode of the community is submitted for strict n/ action/withdrawal his contract.

Enclosures :

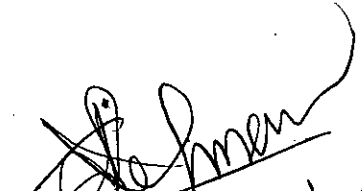
- 1). Abscentism of Muhammad Faraz by Head Master.
- 2). 2nd application Absentism of Muhammad Faraz by Head Master
- 3). Attendance register copies
- 4). Recommendation for discontinuation of contract by the then DEO Male Hangu
- 5). HM application of absentism
- 6). IMU reports of absentism
- 7). Deduction report two times.
- 8). Pay restoration letter.
- 9). Teacher application for resolving the matter.

  
District Education Officer  
Male Hangu  
Smj

**Endst No. & Date as above.**

Copy of the above is forwarded to the:-

1. Deputy Commissioner Hangu
2. Head Master GHS Shamal Din Karbogha
3. Office copy

  
District Education Officer  
Male Hangu  
Smj 14/11/2022

Attested by  


**ADEO (Litigation)**  
DEO (M)  
Hangu

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 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:-

**(SST Bio Chem)**

Sr	Roll No.	Name & Father Name	CNIC No.	Address	Academic Score	NTS Marks	Total Score	Name of School
1	111001929	SHAKIR MUHAMMAD S/O UMER KHAN	13101-2229203-7	MCHALLA MATINAY NARYAB TEHSEIL THALL DISTRICT HANGU	59.73	73	132.73	GHS Doba
2	291002345	URMAN GHANI S/O SURAT KHAN	14102-0366673-9	MCHALLAH SERO KHEL DARSAMAND TEHSEIL THALL DISTRICT HANGU	71.45	57	129.45	GHS Taghuzai
3	291002828	METIDI RAZA S/O REHMAN HUSSEIN	14101-3851653-9	VILL KHAWAJA KHIZER JOUZARA PO LISTERZAI PAYAN THE DIST HANGU	64.44	55	119.44	GHS Raitan
4	181000118	ABDUL SAMAD S/O HASSAN SAIFADUR	14101-4356991-5	VILLAGE CHARADLA DIST HANGU	61.15	57	118.15	GHS Kori Bala
5	181000053	MUHAMMAD BHAFAQ S/O SURAT KHAN	14101-9457887-3	CHARBALA DISTRICT HANGU	61.92	57	117.92	CCMHS No.1 Hangu
6	211000593	MUHAMMAD FARAZ S/O GULBAT KHAN	14101-1631261-5	SHINO MILA TEHSEIL THALL DISTRICT HANGU	54.85	63	117.85	GHS Shantal Din
7	181000120	DAUD AHMAD S/O SHAHEED GUL	14102-0354180-7	P.O KARSOCHA SHARIF THALL THE DIST HANGU	59.04	57	116.04	GHS Miraji Khel
8	291002753	TARIQ KHAN S/O HAJEE GUL	14102-0361105-3	ALLAMA IQBAL HOTEL BROOM 45 UI OF PESHAWAR	67.83	55	122.83	GHS Darsamand
9	181000121	ALAPATAGEEN SHAH S/O TARIQ SHAH	14102-0365415-5	MCHALLA SHAHORE MAIN BAZAR THE THALL DIST HANGU	59.89	54	113.89	GHS Mamoon Bar da
10	181000042	RAZA ULLAH S/O MUHAMMAD KHALIQ	14101-1902630-5	Village Shansawari Hangu, Tehsil & District Hangu	58.44	57	115.44	CCMHS NO.1 Hangu
11	181000074	SAJID REHMAN S/O KABEL MAT KHAN	14101-9529658-1	ABDUL JANAN KHAI AUTO STORE NEAR AL SHERANI MASJID TAIL RD THE DIST HANGU	61.16	51	112.16	GHS Dorani Bana
12	181000067	IRFAN ULLAH S/O AMR AYOZ	14101-9766774-7	HAFIZ PAINT STORE SAMANA ROAD HANGU	57.15	55	112.15	GHS Chapri Naryab

**(SST Maths Phy)**

Sr	Roll No.	Name & Father Name	CNIC No.	Address	Academic Score	NTS Marks	Total Score	Name of school
1	182000042	SAADAT ALI S/O MINHAJ ALI	14101-8978932-7	VILLAGE GANGAND KALLY HANGU	66.43	57	123.43	GHS Doba
2	292000371	IMRAN UD DIN S/O SHER BAHY	14101-2886891-5	DIST HANGU TEH THALL V O P SAROZAI MOH	68.1	48	116.1	GHS Chapri Naryab

Attested by

*[Signature]*

DEO (Litigation)  
DEO (M)  
Hangu

Hangu Male Appointment Order SST Adhoc 2

3	182700116	ATIF SALEEM S/O NOOR ZAİM	14101- 6197391-9	AWAN PARIKHAN SAYIB ZALDA BILLING STATION VILLAGE AND PO KHABA TITHI THALI AND DISTRICT HANGU	59.64	55	114.64	GHS, Deraft Randa
4	182700124	FAISAL RIZWAN S/O NOOR ZAD GUL	14101- 1861293-3	ASGHAR BANDA HANGU	59.22	55	114.22	GCMHS, No.1 Hangu
5	292001668	WAHID NOOR S/O DALIF NOOR	14102- 0347833-7	Mahallah Tardara Tehsil Thali District Hangu.	59.15	55	114.15	GHS, Masryl Khal
6	102000079	ARSHAD GUL S/O RAJED GUL	14102- 0371120-5	VILLAGE PO NURYAH TEHSIL THALI DIST HANGU	63.13	51	114.13	GHS, Shamal Din
7	182000129	ABID AHMAD S/O GUL AMIR	14102- 0361267-5	VILL AND PO DARSAMAND TEH THALI DIST HANGU	61.64	52	113.64	GHS, Deraft

(SST General)

ATTESTED

Sr	Roll No.	Name & Father Name	CNIC No.	Address	Academic Score	NTS Marks	Total Score	Name of School
1	294002777	BILAL RAZA S/O SAJJAD HUSSAIN	14101- 1316035-3	VILLAGE & PO IBRAHIMZAI DISTRICT HANGU	60.50	77	137.50	GCMHS No.1 Hangu
2	213000540	KALEEM ULLAH S/O ATIQ ULLAH	14301- 6238910-3	MIRBAK TEHSIL & DISTRICT HANGU	65.80	64	129.80	GMS, Simana
3	184000165	MUHAMMAD RAWOOF S/O SHAH MEHMOOD	14102- 0339222-1	VILL TORA GHUNDI PO TORA WARI TEH TAMALI DIST HANGU	58.39	71	129.39	GHS, Chapri Naryab

**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<sup>th</sup> September 2018 to 19<sup>th</sup> 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 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 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.

Attested by  
*[Signature]*

ADEO (Litigation)  
DEO (M)  
Hangu

Hangu Male Appointment Order SST Adhoc

15. Before handing over charge you must check that documents are in order and 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

Encls: No. 50-46 File No. SST Adhoc Hangu and Dated Peshawar the 14/10/2013

Copy forwarded for information and necessary action to:-

1. Accounts 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 Education Department.
7. PA to the Director, ESSE Khyber Pakhtunkhwa Peshawar.
8. M/Files.

*[Signature]*  
14/10/13  
Deputy Director (Exam)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa

ATTESTED

Attested by

*[Signature]*

ADEO (Litigation)  
DEO (M)  
Hangu.



(15)

Annex F

BETTER COPY

## Hangu Male Appointment Order SST Adhoc

## DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION

Khyber Pakhtunkhwa Peshawar

### APPOINTMENT.

Consequent upon recommendation to the Department 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:-

S#	Roll No.	Name & father Name	CNIC NO.	ADDRESS	Academic score	NTS Marks	Total score	Name of school
1	111001029	Shakir Muhammad S/o Umer Khan	13101-2229203-7	MOHALLA MATINAY NARYAB TEHSIL THALL DISTRICT HANGU	59.73	73	132.7	GHS Doaba
2	291002345	Usman Ghani S/o Surat Khan	14102-0366673-9	MOHALLA SERO KHEL DARSAMAND TEHSIL THALL DISTRICT HANGU	71.45	57	128.45	GHS Toghara
3	291002828	Mehdi Raza S/o Rehbar Hussain	14101-3851653-9	VILL KHAWAJA KHIZER JAUZARA PO USTERZAI PAYAN THE DISTT HANGU	84.44	55	139.44	GHS Rarsan
4	181000118	Abdul Samad S/o Hassan Bahadur	14101-4356993-5	VILLAGE CHERAOLA DISTT HANGU	61.35	57	118.15	GHS Kotki Bala
5	181000053	Muhammad Ishtaq S/o Surat Khan	14101-9457887-3	CHERSALA DISTRICT HANGU	61.9	57	117.92	GCMHS No.1 Hangu
6	211000595	Muhammad Faraz S/o Gulbat Khan	14301-1631261-5	SHINO MILA TEHSIL THALL DISTRICT HANGU	54.05	63	117.85	GHS Shamal Din
7	181000120	Daud Ahmad S/o Shafeed Gul	14102-0384180-7	P O KARBOGHA SHARIF THALL THE DISTRICT HANGU	58.04	57	115.04	GHS Mian khal
8	291002753	Tariq Khan S/o Hajee Gull	14102-0361105-3	ALLAMA IQBAL HOTEL 9ROOM 45 UI OF PESHAWAR	67.03	55	122.83	GHS Daesamand
9	181000123	Alapatageen Shah S/o Tariq Shah	14102-0365415-5	MOHALLA SHAHKORE MAIN BAZAR THE THALL DISTT HANGU	59.89	54	113.89	GHS Mamoon Banda
10	181000042	Raza Ullah S/o Muhammad Khalq	14101-1902630-5	VILLAGE SHAMAOWORA HANGU, TEHSIL & DISTRICT HANGU	56.44	57	113.44	GCMHS No.1 Hangu
11	181000074	Sajid Rehman S/o Kabel Mat Khan	14101-9529658-1	ABDUL JANAN KHAN AUTO STORE NEAR AL SHERANI MASJID TALL RD THE DIST HANGU	61.15	51	112.10	GHS dorani danda
12	181000067	Irfan Ullah S/o Mir Ayaz	14101-9766774-7	HAFIZ PAINT STORE SAMNA ROAD HANGU	57.15	55	112.15	GHS Chapri Naryab

### (SST Maths Phy)

S#	Roll No.	Name & father Name	CNIC NO.	ADDRESS	Academic score	NTS Marks	Total score	Name of school
1	182000042	Saadat Ali S/o Mintaj Ali	14101-8918432-7	VILLAGE GANJANO KALLY HANGU	66.43	37	123.43	GHSS Doaba
2	292000371	Imran ud Din S/o Sher Badin	14101-2886891-5	DIST GANJU THE THALL V O P SAROZAI MOH	68.1	48	116.1	GHS Chapri Naryab

**ATTESTED**

**Hangu Male Appointment Order SST Adhoc 2**

AWAL KP PAKISTAN								
3	182000108	Arif Saleem S/o Noor Zada	14101- 0197391-9	SAIRH ZADA FILLING STATION VILLAGE AND PO BOABA TEHSIL THALL AND DISTRICT HANGU	59.64	55	114.64	GHS (sic)
4	182000124	Faisal Rehman S/o Noor Zaid Gul	14101- 1861293-3	ASGHARO BANDA HANGU	59.22	655	114.22	GCMHS No 1 Hangu
5	292001668	Wahid Noor S/o Dalil Noor	14102- 034833-7	MOHALLA TANDARO TEHSIL THAL DISTRICT HAGU	59.15	55	114.15	GHS Marji Khal
6	182000079	Arshad Gul S/o Rajed Gul	14102- 0371120-5	VILLAGE PO NURYAB TEHSIL THAL DIST HANGU	63.13	51	114.13	GHS Shamat Din
7	182000129	Abid Ahmad S/o Gul Amir	14102- 0361267-5	VILL AND PO DARSMAND THE THAL DIST HANGU	61.64	52	113.64	GHSSS Dudha

**(SST General)**

S#	Roll No.	Name & father Name	CNIC NO.	ADDRESS	Academ ic score	NTS Marks	Total score	Name of school
1	294002777	Bilal Raza S/o Sajjad Hussain	14101- 1316035-3	VILLAGE & PO IBRAHIMZAI DISTRICT HANGU	60.50	77	137.50	GCMHS No.1 Hangu
2	213000540	Kaleem Ullah S/o Atiq Ullah	14301- 6238910-3	MIROBAK TEHSIL & DISTRICT HANGU	65.80	64	129.60	GMS, Samana
3	184000165	Muhanamad Rawoof S/o Shah Mehmood	14102- 0339222-1	VILL TORA GHUNDI PO TORA WAR THE THALL DIST HANGU	58.39	71	129.39	GHS Chapri Naryab

**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<sup>th</sup> September 2018 to 19<sup>th</sup> 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 accordingly to merit.
7. Appointment is subject to the condition that the certificate/ documents must be verified from the concerned authorities by the DEO (concerned), an one found producing bogus certificate will be reported to the law enforcing agencies for further actions.
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 joint his post within 15 days of the issuance of this notification. In case of failure to joint 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.

**ATTESTED**

*(Signature)*

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Annex F

BETTER COPY

Hangu Male Appointment Order SST Adhoc 3

15. Before handing over charge once again, (sic) document maybe annexed if they (sic) required relevant qualification as per rules, they may be (sic) charge of the post.

(Farid Ahmad Khattak)  
Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

Endst: No.590-96/FileNo.1/SST/Adhoc (sic) Dated Peshawar the 14/09/2018

Cop forwarded for information and necessary action to:

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. of Khyber Pakhtunkhwa E&SE Department.
7. PA to the Director E&SE, Khyber Pakhtunkhwa, Peshawar.
8. M/File.

Sd/-  
Deputy Director (Estab.)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa

ATTESTED

**AUTHORITY**

Mr. Muhammad Nawaz-ADEO(Lit) of this office is hereby authorized to attend the  
court of Hon'able Peshawar <sup>Service Tribunal</sup> ~~High Court~~, Peshawar in connection with

Muhammad Faraz s/A 822 of 023 vs Govt of KP

on dated 12-07-023 on behalf of undersigned.



District Education officer  
(Male) District Hangu

D.E.O (M)  
Hangu.

Handwritten notes and stamps on the right margin, including a circular stamp and vertical text.