

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

SERVICE APPEAL NO. 1752/2022

**Akbar Ali, PET, (BPS-15) GHHS Baghicha Deri, District
Mardan.....**

**Appellant
Khyber Pakhtunkhwa
Service Tribunal**

VERSUS


Diary No. 7250

Dated 29/1/22

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

INDEX

S/#	Description of document	Annexure	Pages No.
1	Joint Para Wise Comments along with affidavit		1-3
2	Copy of the appointment order dated 27-03-2015.	A	4,5
3	Copy of the Notification dated 10-03-2018	B	6-8
4	Copy of the Notification dated 26-04-2018.	C	9,10
5	Authority letter		11


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

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

SERVICE APPEAL NO. 1752/2022

Akbar Ali, PET, (BPS-15) GHHS Baghicha Deri, District
Mardan.....Appellant

VERSUS

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

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

Respectfully Sheweth :-

The Respondents Submit as under: -

PRELIMINARY OBJECTIONS.

- 1 ***That*** the Appellant has got no cause of action & locus standi to file the instant appeal before this Honorable Tribunal.
- 2 ***That*** the appellant has concealed material facts from this Honorable Tribunal in the titled appeal.
- 3 ***That*** the Appellant has not come to this Honorable Court with clean hands.
- 4 ***That*** the appeal is bad for mis-joinder and non-joinder of the necessary Parties.
- 5 ***That*** the appellant is not an aggrieved person within the meaning of Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974.
- 6 ***That*** the appeal in hand is barred by the law of limitation.
- 7 ***That*** the appellant could not made out his case for promotion as SST in the Department.
- 8 ***That*** the cadre of the appellant has a separate Service Rules Notified on 26-04-2018 for promotion in the upper scales in the Respondent Department.

ON FACTS.

- 1 ***That*** Para-1 is correct that vide Notification dated 27-03-2015, the appellant was appointed against the PET in BPS 15 post on purely contract/temporary bases for the initial period of one year in the Respondent Department. ***(Copy of the appointment order 27-3-2015 is attached as (Annexure-A).***

- 2 ***That*** Para-2 is correct. that vide Notification dated 10-03-2018 the appellant was regularized against the PET in BPS-15 post. ***(Copy of the Notification dated 10-03-2018 is Annexure-B).***
- 3 ***That*** Para-3 is incorrect as there is a separate service rules notified vide Notification dated 26-04-2018 whereby, the appellant along with his colleagues has been provided fair chances of promotion in the upper scales against the IPE in BS-17, SIPE BS-18 and even again the post of Additional Director (DE&S) in BS-19 in the Respondent Department subject to the condition of Seniority cum fitness of the appellant. ***(Copy of the Notification dated 26-04-2018 is attached as Annexure-C).***
- 4 ***That*** Para-4 is incorrect as the Service Rules dated 13-11-2012 Super ceded by the Current Service Rules dated 26-04-2018 for the cadre of the appellant by the Department.
- 5 ***That*** Para-5 is also incorrect the appellant could not made out his case for promotion as SST under the rules in the Department nor qualify the criteria for promotion in the Department.
- 6 ***That*** Para-6 is incorrect as no Departmental appeal against the Service Rules dated 24-07-2014 has been filed by the appellant till date.
- 7 ***That*** Para-7 is incorrect as the appellant has got no cause of action to filed the instant appeal before this Honorable Tribunal therefore, the appeal in hand is liable to be dismissed on the following grounds inter alia:

ON GROUNDS.

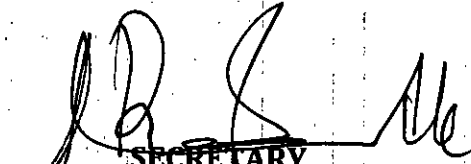
- A. **Incorrect & not admitted.** the Service Rules dated 24-07-2014 is within legal sphere and liable to maintained in favor of the Department.
- B. **Incorrect & not admitted.** The plea of the appellant is against the factual position of the case on the grounds that he has a separate service rules notified on dated 26-04-2018 by the Respondent Department.
- C. **Incorrect & not admitted.** The act of the Department is legal and liable to be maintained.
- D. **Incorrect & not admitted.** the appellant has been treated as per law, rules & policy by the department in the instant case. However, the plea of the appellant is illegal.
- E. **Incorrect & not admitted.** the act of the Department with regard to the Notification dated 24-07-2014 is legal.
- F. **Incorrect & not admitted.** The appellant has been treated as per law rules & policy by the department having not violated the provision of Section-9 of the civil servant Act 1973 read with Rule-7 of APT Rules 1989 in the titled case

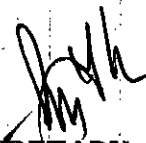
- G. Incorrect & not admitted, the act of the Department is not only legal but is also in accordance with the provision of Article 38 (e) of the constitution of 1973.
- H. Incorrect & not admitted. As the appellant is not an aggrieved person within the meaning of Article 212 of the constitution 1973, however, the Respondent also seek leave of this Honorable Tribunal to submit additional ground, record of case Law at the time of arguments on the date of hearing.


PRAYER:


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

Dated. ___/___/2023.


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


SECRETARY
Govt; to Khyber Pakhtunkhwa
Finance Department.
(Respondent No: 3)


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


SECRETARY
Govt; to Khyber Pakhtunkhwa
Establishment Department
(Respondent No: 2)

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.


Deponent

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

Service Appeal No: 1752/2022

**Akbar Ali, PET, (BPS-15) GHHS Baghicha Deri, District
Mardan.....Appellant**

VERSUS

**Government of, Khyber Pakhtunkhwa through the Secretary E&SE
Department & 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

ATTESTED





4 AK - 4 - Initial order
PET

OFFICE OF THE DISTRICT EDUCATION OFFICER
(MALE) MARDAN
Phone No.09379230151

APPOINTMENT

Consequent upon the recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the post of P.E.T. on school based in BPS-15 (Rs.8500-700-29500) Rs.8500/- Fixed plus usual allowances as admissible under the rules on adhoc basis on Contract under the existing policy of the Provincial Govt. in Teaching Cadre on the terms and conditions given below with effect from the date of their taking over charge in the schools as noted against each:-

Sr. No.	Roll No	Name	Father Name	Date of Birth	School Where he appointed	Address	SCORE
1	461500203	SIRAJ MULHAMMAD	MUSAFAR KHAN	03.03.1985	GMS RAILWAY STATION	SAFI ADAD QASIM	124.06
2	601500194	FAIZ UL AMIN	MISAL KHAN	01.01.1988	GMS LUND KHAWAR	IMR SADDI	118.06
3	461500299	AKBAR ALI	MUHAMMAD ZAREEN	05.03.1986	GHSS BAGHICHA DHERI	HATHIAN TIBHAI	114.82
4	451500364	FARMAN ULLAH	AMAN ULLAH	04.06.1988	GMS BHAI KHAN	SERI BEHLOL TIBHAI	113.57
6	451500303	ABDUR RAHIM	MUKAMIL KHAN	12.04.1984	GHS ANAR BAIG	SHERO SHEGO KILLI MARDAN	112.32

TERMS & CONDITION

- 1 NO TA/DA etc is allowed
- 2 Charge reports should be submitted to all concerned in duplicate.
- 3 Appointment is purely on temporary and contract basis initially for one year w.e.f. the date of issue this order.
- 4 They should not be handed over charge if they exceeds 35 years or below 18 years .
- 5 Appointment is subject to the condition that the certificate/documents must be verified from the concerned authorities by Drawing Disbursing Officer (concerned) and after verification their verified Degrees/Certificates should be sent to DEO Male Mardan Officer for pay release order in case of fake/bogus certificate/ degrees detected later on their appointment order would be automatically cancelled from the date of appointment order would be automatically canceled from the date of appointment and will be reported, to the law enforcing agencies for legal action .
- 6 Their services are liable to termination on one month's notice from either side. In case of resignation without notice his on-month pay/allowances shall be forfeited to the Government.
- 7 They should join their 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, their appointment will expire automatically and no subsequent appeal etc shall be entertained.
- 8 Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
- 9 They will be governed by such rules and regulations as may be issued from time to time by the govt.

le

Handwritten signature and stamp of the District Education Officer, Male Mardan.

Handwritten signature and stamp of the District Education Officer, Male Mardan.

- 10 Their services shall be terminated at any time, in case their performance is found unsatisfactory during their contract period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
- 11 Their appointment is made on school based, they will have to serve at the place of posting and their service is not transferable to any other station.
- 12 Before handing over charge once again their document may be checked if they have not the required relevant qualifications they may not be handed over charge.

HANIFULLAH
 DISTRICT EDUCATION OFFICER
 (MALE) MARDAN

Endst no 2122/4 AE-IV/ESTB BRANCH DATED 27/3 2015

Copy forwarded for information and necessary action to the:-

- 1 Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
- 2 PS to Minister for Elementary/Secondary Education Khyber Pakhtunkhwa Peshawar.
- 3 PS TO Secretary to Govt/Khyber Pakhtunkhwa E&SE Department
- 4 District Account Officer Mardan
- 5 All Principal Head Master Concerned.
- 6 PA to the Director E&SE Department Khyber Pakhtunkhwa Peshawar
- 7 Official Concerned.
- 8 Master File

DISTRICT EDUCATION OFFICER
 (MALE) MARDAN

Attested
 [Signature]

[Signature]

Regularization order.

~~Adhoc~~ ~~Adhoc~~ ~~Adhoc~~

-6-

BC



OFFICE OF THE DISTRICT EDUCATION
OFFICER (MALE) MARDAN
PH No#0937-9230151

Notification.

Under the provision of The Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2018 (Khyber Pakhtunkhwa Act No.1 of 2018), Services of the following Physical Education Teachers appointed on adhoc basis on Contract, are hereby regularized in BPS-15, on the same posts in Teaching Cadre on the terms and condition given below with effect from the date of their appointment on the PET post-

(PET 2014)

Sr	RollNo	Name	Address	Total Marks (out of 300)	School	Appointment order No and dated	Exemption order No and dated if any
1	2720150	MUHAMMAD SABIR	GUJARAT MARDAN 16101-1294476-5	116.88	GMSTAIHQ ABAD	7044/G DATED 13-06-14	5665/G DATED 13-06-17
2	2720149	ALAMGIR	CHECK BILANDI KATEANG MARDAN 16101-3321378-7	114.56	GHS BABUZAI MARDAN	7044/G DATED 13-06-14	5665/G DATED 13-06-17
3	2720153	SAJJAD AHMAD KHAN	TAKKAR MARDAN 16102-4819890-3	112.14	GMS ZAMAN KHAN KORONA MARDAN	7044/G DATED 13-06-14	5665/G DATED 13-06-17
4	2720104	ASGANDIYAR KHAN	GUJARAT MARDAN 16101-6206786-7	111.94	GHS KHANPUR	7044/G DATED 13-06-14	5665/G DATED 13-06-17
5	2720044	JAN NAYAZ	HUSSAIN STOP MARDAN 16101-1895374-7	110.84	GMS SURKH DHERI RUSTAM	7044/G DATED 13-06-14	5665/G DATED 13-06-17
6	2720013	MUHAMMAD SALEH	GUJARAT MARDAN 16101-3458911-9	109.04	GHS BARO BANDA	7044/G DATED 13-06-14	5665/G DATED 13-06-17
7	2720010	MUHAMMAD IBRAHIM	TOR DHER MARDAN 16102-2110118-7	107.68	GHS MAYAR MARDAN	7044/G DATED 13-06-14	5665/G DATED 13-06-17
8	2720014	MUHAMMAD AYAZ	YEH KOHI MARDAN 16102-5926110-7	107.28	GHS KHANJAR	7044/G DATED 13-06-14	5665/G DATED 13-06-17
9	2720066	ABDUL JALIL KHAN	QASIM TORU MAIRA MARDAN 16102-2874086-7	106.02	GHS GHALADHER	7044/G DATED 13-06-14	5665/G DATED 13-06-17
10	2720120	MUHAMMAD SAJJID KHAN	BAND SHAH KATLANG MARDAN 16101-3099931-7	105.05	GHS SANGAO MARDAN	7044/G DATED 13-06-14	5665/G DATED 13-06-17
11	2720051	MUHAMMAD ARIF	KHADI KILFI MARDAN 16102-2306519-3	105.95	GMS SHAH KILFI	7044/G DATED 13-06-14	5665/G DATED 13-06-17
12	2720010	MOHSIN ALI	SAPI ABAD MARDAN 16102-2290081-9	103.82	GMS BAZAR RUSTAM	7044/G DATED 13-06-14	5665/G DATED 13-06-17
13	2720048	MUHAMMAD SUAIMAN	BAIKHSHALI MAJIDAN 16101-1168328-1	103.79	GMS OHERNA MARDAN	7044/G DATED 13-06-14	5665/G DATED 13-06-17
14	2720012	AKBAR SHAH	TOUDHER MAJIDAN 16102-0412726-5	103.30	GMS SURI MALANDARI	7044/G DATED 13-06-14	5665/G DATED 13-06-17
15	2720031	HAZAT AHMAD	LUNDKHWAR MARDAN 16102-2306800-3	102.86	GMS GUMBAT	7044/G DATED 13-06-14	5665/G DATED 13-06-17
16	2720101	HAZRAT USMAN	SHAH ZAMAN KORONA T. BHAI MARDAN 16102-0378530-1	102.10	GHS ZANDO DHERI	7044/G DATED 13-06-14	5665/G DATED 13-06-17
17	2720040	MUHAMMAD AYAZ	JALALA MARDAN 16102-2260254-5	101.19	GHS KOHI BARMOL	7044/G DATED 13-06-14	5665/G DATED 13-06-17
18	2720110	SYED SHAHZED BACHA	GUJAR GARHI MARDAN 16101-8728958-3	101.17	GHS GARHI KAJI UJA MARDAN	7044/G DATED 13-06-14	5665/G DATED 13-06-17

11 Page

AH Stead
13/6/17

-7-

19	2720080	HUSNUL WAHAB	MUSLIM ABAD BALA GARHI MARDAN 16101-0546322-3	100.44	GMS CHAR GULLI	7044/G DATED 13-06-14	5665/G DATED 13-06-17
20	2720069	MUSLIM IOHAN	UMAR ABAD MARDAN 16102-4181600-3	99.10	GMS BADAM	7044/G DATED 13-06-14	5665/G DATED 13-06-17

(PET 2015)

Sr	RollNo	Name	Address	Total Marks (out of 200)	School	Appointment order No and dated	Extension order No and dated if any
1	451500104	FAIZUL AMIN	PIRSADDI MARDAN 16102-2484297-7	118.25	GHS NO.2 LUNDIGIWAR	2122/G DATED 27-03-15	3248/G DATED 13-04-17
2	451500399	AKBAR ALI	HATHIAN MARDAN 16102-4141124-5	114.82	GHSS BACHICHA DHERI MARDAN	2122/G DATED 27-03-15	3248/G DATED 13-04-17
3	451500364	FARMAN ULLAH	SERI BAHLOL MARDAN 16102-8189320-1	113.57	GMS BHAI KHAN	2122/G DATED 27-03-15	3248/G DATED 13-04-17
4	451500303	ABDUR RAHIM	SHERO SHAGO KILLI MARDAN 16102-6770231-3	112.32	GHS ANAR BAIG MARDAN	2122/G DATED 27-03-15	3248/G DATED 13-04-17

(PET 2017)

Sr	RollNo	Name	Address	Total Marks (out of 200)	School	Appointment order No and dated	Extension order No and dated if any
1	451500362	MUHAMMAD ISMAIL	JAMAL GARHI MARDAN 16101-6591987-5	133.91	GHS SARFARAZ KILLI	3132/G DATED 07-04-17	
2	451500429	MUHAMMAD ISLAM	IKRAM PUR T. BHAI MARDAN 16102-5451045-9	128.60	GHSS NO.3 MARDAN	3132/G DATED 07-04-17	
3	451500441	ZIA UL ISLAM	IKRAM PUR T. BHAI MARDAN 16102-3789689-7	124.30	GMS MOTI BANDA	3132/G DATED 07-04-17	
4	451500454	FAROOQ AZAM KHAN	16101-7532250-1	123.40	GMS JALAL KILLI	3132/G DATED 07-04-17	
5	451500462	MUBASSIR IOBAL	TORU MARDAN 16101-9108128-7	123.00	GMS PURANA HOTI	3132/G DATED 07-04-17	
6	451500557	SAJAD AL MULK	JAMAL GARHI MARDAN 16101-9798034-3	121.88	GHSS BADAR BANDA	3132/G DATED 07-04-17	
7	451500422	SAFEER AHMAD	QAYUM ABAD TORU MARDAN 16101-4821489-9	121.70	GHSS MAYAR MARDAN	3132/G DATED 07-04-17	
8	451500531	MAJID ALI	GUJAR GARHI MARDAN 16102-7337338-6	121.67	GMS MEHTER GHUNDAI	3132/G DATED 07-04-17	
9	451500624	MAJID ULLAH	BAKHSHALI MARDAN 16101-2978716-1	121.40	GHSS MOHIB BANDA	3132/G DATED 07-04-17	
10	451500398	MUHAMMAD TANVIR	KATLANG MARDAN 16102-6084017-3	121.30	GMS MUSAFAR KHAN KILLI	3132/G DATED 07-04-17	
11	451500541	EJAZ ALI SMAH	BABUZAI KATLANG MARDAN 16101-3163755-9	121.09	GMS ALAM GAN MARDAN	4799/G DATED 17-05-17	
12	451500534	MUHAMMAD IMAD ZEB	TAKKAR ROAD MARDAN 16102-7902088-1	120.41	GHS AFZAL ABAD	4799/G DATED 17-05-17	

SN-02/245

[Handwritten signature]

4515300370	FARMAN ULLAH	NASIR KHAN KILLI MARDAN 16102- 4897609-7	122 73	GHS BAKRI BANDA	6835/G DATED 16-08- 17
------------	--------------	--	--------	--------------------	------------------------------

TERMS & CONDITIONS.

- The regularization will not be in favour of those who have not taken over charge or has remained absent from duty or resign from service and also not for those or their lien cancelled on their own request and adjusted in their original post who are under disciplinary proceedings.
- They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- The employees whose services are regularized under The Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2018 (Khyber Pakhtunkhwa Act No. 1 of 2018) or in the process of attaining service at the commencement of The Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2018 (Khyber Pakhtunkhwa Act No. 1 of 2018) shall rank junior to all civil servants belonging to the same service or cadre, as the case may be, who are in service on regular basis on the commencement of The Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2018 (Khyber Pakhtunkhwa Act No. 1 of 2018), and shall also rank junior to such other persons, if any, who, in pursuance of the recommendation of the Commission made before the commencement of this Act, are to be appointed to the respective service or cadre, irrespective of their actual date of appointment.
- The seniority interest of the employees, whose services are regularized under this Act within the same service or cadre, shall be determined on the basis of their continuous officiation in such service or cadre.

(IJAZ ALI KHAN)
DISTRICT EDUCATION OFFICER
(MALE) MARDAN
Dated: 10/03/2018

Encls: No. 209/19-V.I/Regularization file/LET

- Copy forwarded for information and necessary action to the:
- PS to The Secretary of Govt. Khyber Pakhtunkhwa Peshawar.
 - PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
 - District Accounts Officer Mardan
 - All Principal/Headmaster Concerned.
 - Budget & Accounts Officer, Local Office
 - Official Concerned
 - 11/11/17

(Signature)
DISTRICT EDUCATION OFFICER
(MALE) MARDAN

**GOVERNMENT OF THE KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT.**

NOTIFICATION

Peshawar, Dated the 26.04.2018

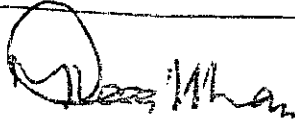
NOTIFICATION

No.SO(B&A)1-18/2018/DPE Service Rules:- In pursuance of the provision contained in sub rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department hereby directs that in this Department's Notification No. SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre, dated, 13.11.2012, the following further amendments shall be made, namely:

AMENDMENTS

In the appendix, for Serial No. 1A, the following shall be substituted in respective columns, namely:

S.No.	Nomenclature of the post	Minimum Qualification for appointment by initial recruitment or by transfer.	Age limit.	Method of recruitment.
1	2	3	4	5
1A	Instructor Physical Education (BPS-17)	<p>(i). At least Second Class Master's Degree in Physical Education, with Bachelor of Education (B.ED) or equivalent qualification from a recognized university.</p> <p>(ii). If no suitable candidate possessing the above qualification is available a candidate possessing Master's Degree in the Physical Education may be appointed as an Instructor Physical Education subject to the condition that he shall acquire the qualification of Bachelor of Education (B.ED) within three years from the date of his appointment, failing which his service shall be terminated without notice irrespective of any provision of the rules for the time being enforce.</p>	22-35 years	<p>(a) Seventy percent by Promotion, on the basis of seniority-cum-fitness, from among Senior Physical Education Teacher BPS-16 with at least five years' service as Senior Physical Education Teacher (SPETs) and Physical Education Teacher (PET) provided that if no suitable person is available from amongst Senior Physical Education Teacher (SPETs) for promotion then the post shall be filled by promotion on the basis of seniority-cum-fitness from amongst the Physical Education Teacher (PETs) with at least five years' service as such having qualification in column No.3.</p> <p>Note: - if no suitable person is available for promotion then by initial recruitment; and</p> <p>(b) Thirty percent by initial recruitment.</p>


 Attested
 [Signature]

9

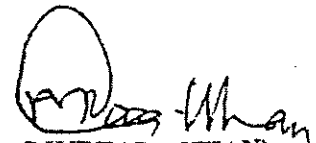
**SECRETARY TO
GOVERNMENT OF KHYBER PAKHTUNKHWA,
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT.**

Endst. Of even Number & Date.

Copy of the above is forwarded to:-

1. The Secretary to Government of Khyber Pakhtunkhwa, Establishment Department.
2. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department.
3. The Secretary to Government of Khyber Pakhtunkhwa, Law Department.
4. The Secretary to Government of Khyber Pakhtunkhwa Public Service Commission.
5. The Accountant General Khyber Pakhtunkhwa Peshawar.
6. The Secretary, Social Sector FATA Secretariat, Warsak Road, Peshawar.
7. The Directors E&SE, PITE and DCTE Khyber Pakhtunkhwa.
8. The Director Education, FATA Warsak Road Peshawar.
9. The Director FMIU Finance Department.
10. Manager Government Printing Press, Khyber Pakhtunkhwa Peshawar with the request for publication in the next official Gazette.
11. Deputy Director (EMIS) E&SE Department.
12. All the DEOs (M/F) Khyber Pakhtunkhwa.
13. All the Agency Education Officers/ Agency Accounts Officers, FATA.
14. All District Accounts Officers Khyber Pakhtunkhwa.
15. The Section Officer (FR) Finance Department.
16. The Budget Officer-V and X, Finance Department.
17. Assistant Legal Drafter-IV, Govt. of Khyber Pakhtunkhwa Law Department.
18. Section Officer (R-I) Govt. of Khyber Pakhtunkhwa Establishment Department.
19. The Section Officers (S/M/F) E&SE Department.
20. The Section Officer (Primary) E&SE Department.
21. The Section Officer (Lit-I) E&SE Department.
22. The Section Officer (General) E&SE Department.
23. PS to Governor Khyber Pakhtunkhwa.
24. PS to Chief Minister Khyber Pakhtunkhwa.
25. PS to Chief Secretary Khyber Pakhtunkhwa.
26. PS to Minister Education Khyber Pakhtunkhwa.
27. PS to Secretary E&SE Department.
28. PS to Special Secretary E&SE Department.
29. Master File.

*Approved
1/12/2019*


(MURTAZA KHAN)
SECTION OFFICER (BUDGET)