

Service Appeal No: 3239/2021

3rd July, 2023

1. Appellant in person present. Mr. Asad Ali Khan, Assistant Advocate General for the respondents present.

2. Appellant deposited cost of Rs. 10000/- through office of Registrar of this Tribunal, receipt of which is placed on file. Appellant seeks adjournment on the ground that his learned counsel is busy before the camp court Swat. Adjourned but as a last chance.

To come up for arguments on 31.10.2023 before D.B. P.P given to the parties.

SCANNED
KPST
Peshawar



(Rashida Bano)
Member (J)




(Kalim Arshad Khan)
Chairman

Adnan Shah

2nd May, 2023

1. Learned counsel for the appellant present and heard.
2. This application is for restoration of appeal which was dismissed in default on 03.11.2022. It appears that on 18.10.2022, the matter was fixed before the Tribunal and was adjourned to 03.11.2022. On 03.11.2022, neither the appellant nor his counsel put appearance before the Tribunal and the appeal was dismissed in default due to non-appearance of the appellant and his counsel. In order to secure the ends of justice, this application is allowed but on payment of Rs.10000/- as cost to be paid by the appellant. The appeal stands restored to its original number. The appellant is given last chance to argue this appeal failing which the appeal will be decided on the available record without the arguments. To come up for arguments on 03.07.2023 before D.B.
3. *Pronounced in open court in Peshawar and given under my hand and seal of the Tribunal on this 2nd day of May, 2023.*



(Salah Ud Din)
Member (J)



(Kalim Arshad Khan)
Chairman

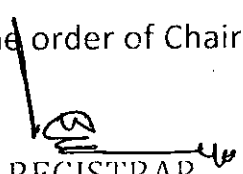

Adnan Shah, P.A.

SCANNED
KPST
Peshawar

Form-A
FORM OF ORDER SHEET

Court of _____

Restoration Application No. 749/2022

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge
1	2	3
1	22.12.2022	<p>The application for restoration of Appeal No. 3239/2021 submitted today by Akhunzada Ahmad Saeed Advocate. It is fixed for hearing before Division Bench at Peshawar on <u>15-3-23</u>. Original file be requisitioned. Notices be issued to applicant and his counsel for the date fixed.</p> <p>By the order of Chairman  REGISTRAR,</p>
	15.03.2023	<p>Learned counsel for the appellant present.</p> <p>The instant restoration application has been inadvertently fixed before the S.B, therefore, to come for arguments on restoration application before the D.B on 02.05.2023. P.P given to learned counsel for the appellant.</p> <p> (Muhammad Akbar Khan) Member (E)</p>

SCANNED
KPST
Peshawar

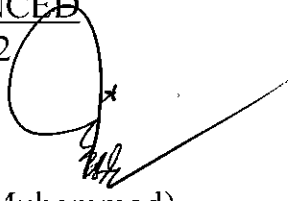
SCANNED
KPST
Peshawar

ORDER
03.11.2022

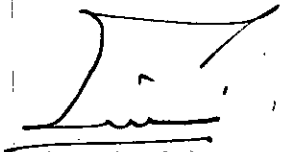
Nemo for the appellant. Mr. Masood Khan, ADEO alongwith Mr. Muhammad Jan, District Attorney for official respondents present.

The appeal in hand was called on for hearing after various intervals, however none appeared on behalf of the appellant till the closing time, therefore, the appeal in hand stands dismissed in default. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
03.11.2022



(Mian Muhammad)
Member (E)



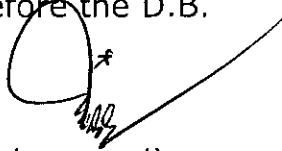
(Salah-Ud-Din)
Member (J)

SCANNED
KPST
Peshawar

07.07.2022

Clerk of learned counsel for the appellant present. Mr. Masood Khan, ADEO (Litigation) alongwith Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is not available today due to strike of lawyers. Adjourned. To come up for arguments on 18.10.2022 before the D.B.



(Mian Muhammad)
Member (E)

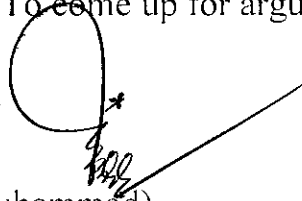


(Salah-ud-Din)
Member (J)

18.10.2022

Learned counsel for the appellant present. Mr. Muhammad Shafiq, Accountant and Mr. Masood Khan, ADEO alongwith Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

Arguments could not be heard due to paucity of time. Adjourned. To come up for arguments on 03.11.2022 before the D.B.



(Mian Muhammad)
Member (E)




(Salah-Ud-Din)
Member (J)

21.12.2021

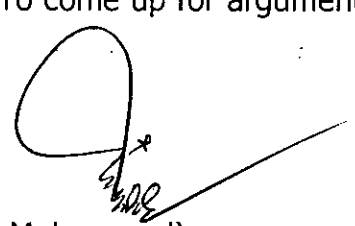
Clerk of counsel for the appellant and Mr. Muhammad Adeel Butt, Addl. AG for official respondents present. None present on behalf of private respondents despite proper service, hence proceeded against ex-parte.

Respondents have not submitted written reply/comments. Learned AAG seeks time to contact the respondents and facilitate the reply/comments on next date. Last opportunity is granted to the respondents to submit written reply/comments on or before next date with the warning that in case they fail to submit the written reply/comments, their right for reply/comments shall be deemed as struck off by virtue of this order. Case to come up for arguments on 04.04.2022 before the D.B.

04.04.2022

Counsel for the appellant present  Mr. Kabirullah Khattak, Addl. AG for the respondents present.

On previous date, the respondents were given last opportunity to submit written reply/comments on or before the date fixed, failing which their right for reply/comments should be deemed as struck off. The respondents failed to comply with the court order, therefore, their right to submit reply/comments has been struck off by virtue of that order. Learned counsel for the appellant seeks time to argue the case. Last opportunity is granted. To come up for arguments on 07.07.2022 before the D.B.


(Mian Muhammad)
Member(E)


Chairman

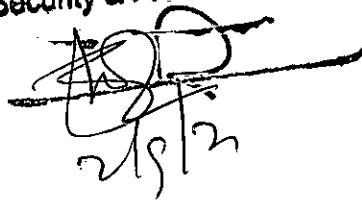
Fazal Mahmood 3239/2021

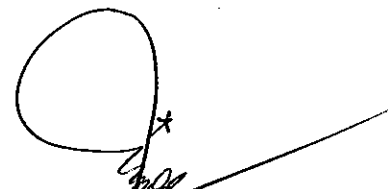
31.08.2021 Counsel for the appellant present. Preliminary arguments heard.

The instant appeal has been instituted against the seniority list of Physical Education Teachers, District Nowshera, ^{Circulated} on 03.10.2020 and name of the appellant stands at serial No.33 thereof. The appellant is aggrieved and claims to have been appropriately placed at serial No.13 of the seniority list. In order to seek departmental remedy available to him, he preferred departmental appeal to respondent No.2 on 20.10.2020 which was *not* decided within the stipulated statutory period, hence, the instant service appeal before the Service Tribunal for redressal of his grievance under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974.

Points raised need consideration. The appeal is admitted to regular hearing, subject to all just and legal objections including limitation. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time or extension of time is not sought, the office shall submit the file with a report of non-compliance. File to come up for arguments on 21.12.2021 before the D.B.

Appellant Deposited
Security & Process Fee

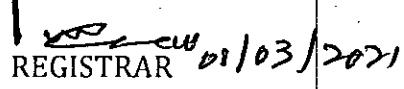

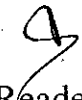



(Mian Muhammad)
Member(E)

FORM OF ORDER SHEET

Court of _____

Case No.- 3239 /2021

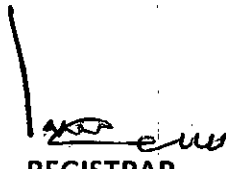
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	01/03/2021	<p>The appeal of Mr. Fazal Mhamood resubmitted today by Mr. Akhonzada Ahmad Saeed Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 01/03/2021</p>
2-	18.05.2021	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>18/05/21</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>Due to demise of the Worthy Chairman, the Tribunal is non-functional, therefore, case is adjourned to 31.08.2021 for the same as before.</p> <p style="text-align: right;"> Reader</p>

The appeal of Mr. Fazal Mahmood son of Sultan Mahmood SPET GHS Samandar Garhi District Nowshera received today i.e. on 17/02/2021 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- 1- Memorandum of appeal is unsigned which may be got signed.
- 2- Index of the appeal may be prepared according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 3- Annexures of the appeal may be attested.
- 4- Appeal has not been flagged/marked annexures' marks.
- 5- Affidavit may be got attested by the Oath Commissioner.
- 6- Copies of notification dated 21.02.2013 and 27.08.2013 mentioned in para-2 & 3 of the memo of appeal respectively are not attached with the appeal which may be placed on it.
- 7- Copy of impugned seniority list is not attached with the appeal which may be placed on it.
- 8- In the memo of appeal many places have been left blank which may be filled up.
- 9- Sub-rule-4 of rule-6 of the Khyber Pakhtunkhwa Service Tribunal rules 1974 requires that every civil servant to whom the relief claimed may affect shall also be shown as respondents.
- 10- Three copies/sets of the appeal along with annexures i.e. complete in all respect for Tribunal and one for each respondent may also be submitted with the appeal.

No. 366 /S.T.

Dt. 17/02/2021

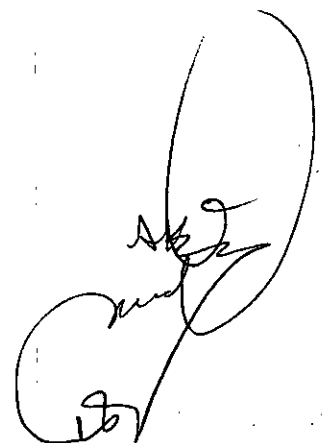

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Akhuzada Ahmad Saeed Adv. Pesh.

Reply

1. Memorandum of appeal has been signed.
2. Removed
3. Removed
4. Removed
5. Removed
6. Removed
7. Seniority list has been attached.
8. Removed
9. Removed
10. Removed

01.03.2021



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

CHECK LIST

1.	Case Title	Fazla Mahmood Vs The Secretary etc		
2.	Case is duly signed.		Yes	No
3.	The law under which the case is preferred has been mentioned.		Yes	No
4.	Approved file cover is used.		Yes	No
5.	Affidavit is duly attested and appended.		Yes	No
6.	Case and annexures are properly paged and numbered according to index.		Yes	No
7.	Copies of annexures are legible and attested. If not, then better copies duly attested have annexed.		Yes	No
8.	Certified copies of all requisite documents have been filed.		Yes	No
9.	Certificate specifying that no case on similar grounds was earlier submitted in this court, filed.		Yes	No
10.	Case is within time.		Yes	No
11.	The value for the purpose of court fee and jurisdiction has been mentioned in the relevant column.		Yes	No
12.	Court fee in shape of stamp paper is affixed. [For writ Rs. 500, for other as required]		Yes	No
13.	Power of attorney is in proper form.		Yes	No
14.	Memo of addressed filed.		Yes	No
15.	List of books mentioned in the petition.		Yes	No
16.	The requisite number of spare copies attached [Writ petition-3, civil appeal (SB-2) Civil Revision (SB-1, DB-2)]		Yes	No
17.	Case (Revision/ Appeal/petition etc) is filed on a prescribed form.		Yes	No
18.	Power of attorney is attested by jail authority (for jail prisoner only)		Yes	No

It is certified that formalities/documentations as required in column 2 to 18 above, have been fulfilled.

Signature:- 

FOR OFFICE USE ONLY 

Case:- _____

Case received on _____

Complete in all respect: Yes/ No, (If No, the grounds) _____

Date in court:- _____

Signature _____

(Reader)

Date:- _____

Countersigned:- _____

(Deputy Registrar)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2021

Fazal Mahmood.....**Appellant**

V E R S U S

The Secretary E&SE Peshawar & others.....**Respondents**

I N D E X

S#	Description of Documents	Annex	Pages
1.	Service Appeal with affidavit		1-9
2.	Addresses of parties		10-12
3.	Copy of the appointment order dated 20.10.1993	A	13-14
4.	Copy of the Notification dated 21.02.2013	B	15-16
5.	Copy of the Notification dated 27.08.2013	C	17
6.	Copy of order dated 21.11.2019	D	18-19
7.	Copy of the seniority list	E	20-26
8.	Copy of the departmental appeal	F	27-28
9.	Wakalatnama		29

Through

Appellant


Akhuzada Ahmad Saeed
Advocate High Court(s)

Dated 17.02.2021

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,

PESHAWAR

Service Appeal No. 3239 /2021

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 2804

Dated 17/2/2021

Fazal Mahmood

Son of Sultan Mahmood

SPET GHS Samandar Garhi,

District Nowshera.....**Appellant**

V E R S U S

1. The Secretary

Elementary & Secondary Education,

Khyber Pakhtunkhwa,

Civil Secretariat, Peshawar

2. The Director

Elementary & Secondary Education,

Filed to-day Khyber Pakhtunkhwa, Peshawar

ew
Registrar

17/2/2021 3. The District Education Officer

(D.E.O)

District Nowshera.....**Respondents**

**Re-submitted to -day
and filed.**

ew
Registrar

01/03/2021

4. Noor Muhammad S/o Ghareeb Ullah, (SPET)
Government High School No.1, Nowshera Cantt
5. S. Muhammad Junaid S/o S. Ghulam Mustafa, (SPET)
Govt. High Secondary School No.1 Kalan District
Nowshera
6. Hameed ur Rahman S/o Aziz ur Rahman, Govt.
High Secondary School No.2, Nowshera Cantt
(SPET)
7. Shah Faisal S/o Mir Jaffar Khan, Govt. High School,
Nauran Killi, District Nowshera
(SPET)
8. Muhammad Riaz S/o Noor Muhammad Govt. High
School, Mulla Killi, District Nowshera
(SPET)
9. Naseem ud Din S/o Islam ud Din, Govt. High School,
Jehangira Road, District Nowshera
(SPET)
10. Iftikhar Ahmad S/o Mira Khan, Government High
Secondary School, Rashakai District Nowshera
(SPET)
11. Anwar Dad S/o Sher Dad, Government High
Secondary School, Manki Sharif, District Nowshera
(SPET)
12. Haleem Ullah S/o Imad ud Din, Government High
School, manahi, District Nowshera
(SPET)
13. Irfan Ali Son of Taj Ali, Government High School,
Dhari Katti Khel, District Nowshera
(SPET)
14. Asim Mehmood S/o Abdul Khaliq, Government
High School No.2, Kalan, District Nowshera
(SPET)

- (SPEET)
15. Musarrat Shah S/o Musammer Shah, Government High School, Khaisari District Nowshera
- (SPEET)
16. Lal Said S/o Gul Aban, Government High Secondary School, Pahari Katti KHEL, District, Nowshera
- (SPEET)
17. Taskeen Ullah Shah S/o Kiramat Shah, Government High Secondary School, Khair Abad, District Nowshera
- (SPEET)
18. Muhammad Arshad Shah S/o Naseeb Shah, Government High Secondary School No.1, Shaidu, District Nowshera
- (SPEET)
19. Rehan Ali S/o Multan Khan, Government High School, Zara Miana, District Nowshera

.....Respondents

**SERVICE APPEAL U/S 4 OF THE KHYBER
PAKHTUNKHWA SERVICES TRIBUNAL ACT,
1974, AGAINST THE IMPUGNED SENIORITY
LIST ISSUED BY RESPONDENTS AND ORDER
OF DEPARTMENTAL AUTHORITY DATED NIL
WHEREBY HE DID NOT PASS ANY ORDER
OVER THE DEPARTMENTAL APPEAL OF THE
APPELLANT WITHIN A STIPULATED PERIOD
OF NINETY DAYS.**

Respectfully Sheweth:

1. That the appellant was appointed as PET on 20.10.1993 and since then he is serving the departmental with zeal, devotion and commitment. (Copy of the appointment order dated 20.10.1993 is attached as Annexure "A").
2. That earlier the Seniority list was displayed whereby Junior PETS from the appellant were placed senior then the appellant submitted departmental appeal before respondent No.2/the Director and respondent No.2 /The Director was pleased to accept the departmental Appeal of the appellant and then placed him at serial No.13-A of the seniority list and as per the seniority list the appellant alongwith other colleague PETS were promoted against the post of Senior PETS (BPS-16) on 21.02.2013. (Copy of the Notification dated 21.02.2013 is attached as annexure "B").
3. That the appellant was transferred from GMS Kandar and was posted at GHS Samandar Ghari as senior PET (BPS-16) on 27.08.2013.

(Copy of the Notification dated 27.08.2013 is attached as Annexure "C").

4. That thereafter respondent No.3/DEO displayed number of seniority lists wherein the seniority position of the appellant was again disturbed/affected and Junior PETs were placed senior from the appellant then the appellant submitted departmental Appeal and then filed Service Appeal No.205/2018 before this Hon'ble Court but during the pendency of Service Appeal the Respondent Department gave assurance to the appellant to withdraw the Service Appeal as they would redress his grievance and the appellant withdrew his service appeal with the permission to file fresh appeal if needed under the circumstances. (Copy of the order dated 21.11.2019 is attached as Annexure "D").

5. That the appellant time and again approached the respondent department to redress his grievance as per the commitment but the grievance of the appellant was not redressed and when the seniority list was

again displayed then juniors were again placed senior than the appellant. (Copy of the seniority list is attached as annexure "E").

6. That the appellant filed departmental appeal on 20.10.2020 but the same was not decided within a stipulated period of ninety days. (Copy of the departmental appeal is attached as annexure "F").
7. That the appellant now prefers this Service Appeal before this Hon'ble Tribunal for the following amongst other grounds:

GROUND S:

- A. That as stated in the body of the appeal that when earlier the seniority of the appellant was disturbed by respondent No.3/ The District Education Officer then for the redressal of his grievance the appellant filed departmental appeal before respondent No.2/ the Director and the Director was pleased to accept the departmental Appeal of the appellant and placed him to his right seniority position and then the appellant was promoted to senior Physical Education Teacher (SPET) and after

sometime the seniority position of the appellant was again disturbed by respondent No.3/DEC and violated the order of higher authority/respondent No.2 as respondent No.3/DEO being lower authority was having no legal authority to violate/disobey the order of respondent No.2/ the Director.

- B. That respondent No.3/ the DEO exceeded his authority as respondent No.3 was only competent to deal with the service affairs of employees upto BPS-15 and below as all service affairs of BPS-16 employees falls under the domain of respondent No.2/ the Director. In this view of matter, the impugned order of respondent No.3 by exceeding his authority is void ab-initio, illegal, unlawful and without lawful authority and is liable to be set aside and the impugned seniority list is liable to be corrected and the appellant is to be placed senior from respondent No.4 to 19.
- C. That all public functionaries including respondents are obliged to adhere to the object, spirit and purpose of the law of land in

letter and spirit but in the case in hand, respondent No.3 has miserably failed to discharge his statutory objections.

- D. That any other ground, not specifically mentioned, may be raised at the time of arguments, with the prior permission of this Hon'ble Tribunal.

It is, therefore, most humbly prayed that by accepting this Service Appeal, the impugned seniority list may please be set aside and the same may please be corrected, rectified by placing the appellant senior to respondent No.4 to 19.

Any other relief deems fit and appropriate in the circumstances of the instant appeal may also be passed in favour of the appellant.

Through

Appellant

Akhunzada Ahmad Saeed
Advocate High Court(s)

Dated 17.02.2021

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2021

Fazal Mahmood.....**Appellant**

V E R S U S

The Secretary E&SE Peshawar & others.....**Respondents**

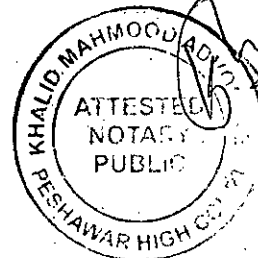
A F F I D A V I T

I, Fazal Mahmood Son of Sultan Mahmood SPET
GHS Samandar Garhi, District Nowshera, do hereby
solemnly affirm and declare that the contents of the
accompanying **Service Appeal** are true and correct to
the best of my knowledge and belief and nothing has
been concealed from this Hon'ble Court.

Identified by:

Akhunzada Ahmad Saeed
Advocate High Court(s)


DEPONENT



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,

PESHAWAR

Service Appeal No. _____/2021

Fazal Mahmood.....**Appellant**

V E R S U S

The Secretary E&SE Peshawar & others.....**Respondents**

ADDRESSES OF PARTIES

APPELLANT:

Fazal Mahmood

Son of Sultan Mahmood

SPET GHS Samandar Garhi District Nowshera

R E S P O N D E N T S

1. The Secretary
Elementary & Secondary Education,
Khyber Pakhtunkhwa,
Civil Secretariat, Peshawar
2. The Director
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar
3. The District Education Officer
(D.E.O)
District Nowshera
4. Noor Muhamad S/o Ghareeb Ullah,
Government High School No.1, Nowshera Cantt

5. S. Muhammad Junaid S/o S. Ghulam Mustafa,
Govt. High Secondary School No.1 Kalan District
Nowshera
6. Hameed ur Rahman S/o Aziz ur Rahman, Govt.
High Secondary School No.2, Nowshera Cantt
7. Shah Faisal S/o Mir Jaffar Khan, Govt. High School,
Nauran Killi, District Nowshera
8. Muhammad Riaz S/o Noor Muhammad Govt. High
School, Mulla Killi, District Nowshera
9. Naseem ud Din S/o Islam ud Din, Govt. High School,
Jehangira Road, District Nowshera
10. Iffikhar Ahmad S/o Mira Khan, Government High
Secondary School, Rashakai District Nowshera
11. Anwar Dad S/o Sher Dad, Government High
Secondary School, Manki Sharif, District Nowshera
12. Haleem Ullah S/o Imad ud Din, Government High
School, manahi, District Nowshera
13. Irfan Ali Son of Taj Ali, Government High School,
Dhari Katti Khel, District Nowshera
14. Asim Mehmood S/o Abdul Khaliq, Government
High School No.2, Kalan, District Nowshera
15. Musarrat Shah S/o Musammer Shah, Government
High School, Khaisari District Nowshera
16. Lal Said S/o Gul Aban, Government High
Secondary School, Pahari Katti KHel, District,
Nowshera

17. Taskeen Ullah Shah S/o Kiramat Shah, Government High Secondary School, Khair Abad, District Nowshera
18. Muhammad Arshad Shah S/o Naseeb Shah, Government High Secondary School No.1, Shaidu, District Nowshera
19. Rehan Ali S/o Multan Khan, Government High School, Zara Miana, District Nowshera

Appellant
Through


Akhuzada Ahmad Saeed
Advocate High Court(s)

Dated 17.02.2021

Encl: No. 8163 / P. No. CT/DM/FED/AT/ Dated Pesh: the 20.10.93.
Appl: 193/

Copy of the above is forwarded to the:-

1. Director of Secondary Education NWFP Peshawar.
2. Director of Primary Edu: Hayat Abad NWFP.
3. PS to Secretary Education Govt: of NWFP.
4. PA to Director of Secondary Edu: NWFP Peshawar.
5. Accountant General NWFP.
6. All the Distt: Edu: Officers (Male) Secondary Peshawar/Nowshera/Charsadda.
7. Principals/Headmasters concerned.
8. ANEO Establishment Branch, Local Office.
9. Suptt: Establishment Branch, Local Office.
10. Candidates concerned.
11. P/File concerned.
12. Distt: Accounts Officers Charsadda and Nowshera.

[Signature]
 Deputy Divisional Director (S) / 19/10/93
 For/Divisional Director of Edu: (Schools)
 Peshawar Division, Peshawar.

Office of the DDO (M) Sec: of Edu: NWFP

Form No 16-18 Dated 25/10/93

copy to the

- 1) DHO, Nowshera
- 2) H/Master Mrs. Chokranwar
- 3) Office concerned

Abdul Jabbar
Steno Typist

[Signature]

[Signature] 25/10/93
 DDO (M)
 Sec: of Edu: NWFP

ATTESTED

ATTESTED

OFFICE OF THE DIV. DIRECTORATE OF EDUCATION (S) PESHAWAR DIVN. PESHAWAR

APPOINTMENT/

Consequent upon the recommendation of Selection Committee. The following candidates are hereby appointed against PST post in the schools mentioned against each in BPS-9 @ Rs.1125-92-2265 fixed usual allowance as admissible under the rules with effect from the date of their taking over charge in the interest of public service.

S.No.	Name of father name With address	School were posted	Remarks
1.	Mohammad Shahid S/o Haji Fazli Karim Nowshera Cantt	G.H.S.S Risalpur NSR.	Against vacant post
2.	Sayar Mohammad S/o Ghulam Mohammad V. Tangi Chd.	G.M.S. Mohmand Abad Umarzai Charsadda	Against vacant post
3.	Fazal Nawaz S/o Abdullah V&P.O D. Khel NSR.	G.M. S Maroba NSR.	Against vacant post
4.	Waliullah S/o Faridullah V.& P.O Charsadda	G.M.S Jehangira Road NSR	-do-
5.	Alam Zeb S/o Abdul Majid Chamkani Peshawar	G.M.S Jongari Nowshera	-do-
6.	Arshad Naz S/o Mushtaq Hussain Teh. & District Chd.	G.M.S Mirzagan Charsadda	Newly created post
7.	Ina mullah Jan S/o Bahadar Khan V. Sarwani Chod.	G.M.S Spin Kana Nowshera	-do-
8.	Mian Arshid Hayat S/o Mian Inwandu Din V. Z.K.K, Sahib NSR.	G.M.S Sawai NSR	-do-
9.	Mohammad Farooq S/o Muhd. Umar Khan V. Abad Killi Ghd.	G.M.S Malik Khan Roorana NSR	-do-
10.	Murad Ali S/o Abdur Rab Kheski NSR.	G.M.S Khat Killi Nowshera	-do-
11.	Saif ur Rheman S/o Siarat Gul V. Qadus Killi Chd.	G.M.S Khaikho Chd.	Employee or Afghan Refugee Relaxed by Govt.
12.	Abdul Ghaffor khalid S/o Mohd. Zaffar Moh. Pinda Khel Charsadda	G.M.S Gul Khitab Umjarzai Chd:	-do-
13.	Umar Hayat PTC GPS No.2 Akbar Pura NSR	G.M.S Kutar Yan Nowhsera	-do-
14.	Mohammad Fahim S/o Fazli Rahim N.V. Kankalar Peshawar	G.M. S Kandar NSR.	-do-
15.	Fazal Mohammad S/o Sultan Mohammad Samandar Garhi NSR	G.M.S Chooki Mamroz NSR	-do-
16.	Tehmidullah S/o Saddatullah V.& P.o Rajjar Charsadda	G.M.S Garhi Chandan NSR	-do-


ATTESTED

Copy of the above is forwarded to the:-

1. Director of Secondary Education, NWFP, Peshawar
2. Director of Primary Edu. Hayatabad NWFP
3. PS Secretary Education Govt. of NWFP
4. PA to Director of Secondary Edu. NWFP Peshawar
5. Accountant General NWFP
6. All the Distt. Edu. Officers (Male) Secondary
Peshawar/Nowshera/ Charsadda
7. Principals/Headmasters Concerned
8. AREO Establishment Branch, Local Office.
9. Supdt. Establishment Branch Local Office.
10. Candidates concerned.
11. P/File concerned.
12. Distt. Accounts officers Charsadda and Nowshera

Sd/-xxx

Deputy, Divisional Director
For/Divisional Director of Edu. (Schools)
Peshawar Division, Peshawar

ATTESTED

ATTESTED

To be substituted bearing even No and date

PETs (M) Nowshehra, 1



Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

PH No. 091-9210389, 9210938,
9210437, 9210957, 9210468
Fax 091-9210936, 0800-33857
E-mail rafiq_kk851@yahoo.com

Annex

Notification

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No SO(B&A)/1-18/E&SE/2012 dated 11.07.2012 and Finance Department Endorsement No. SO(FR)/FD/10-22(E)/2010 dated 16.07.2012, the following Male PETs B-15 are hereby promoted to the post of Senior PET BPS-16 (Rs.10000-800-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with immediate effect and further they will be posted in the Government Higher Secondary /High Schools by the District Education Officers concerned against the newly upgraded Senior PET BPS-16 posts:-

Total No. of PET (M) Posts duly verified by the DAO	119
1/3 share of Senior PET Posts	40
Share of promotion 100 %	40
Promoted to the post of Senior PET B-16	38
Defered for Promotion	02

S.No	S.L. No	Name of Official	place of posting	Date of Birth	Remarks
1	2	Syed Sajid Ali Shah	GCMHS, Akora Khattak	30/08/1957	Services placed at the disposal of DEO (M) Nowshehra for further posting.
2	3	Shah Zada	GHS, Kahi	04/05/1957	---Do---
3	5	Liaqat Ali	GMS, Pabbi	02/12/1964	---Do---
4	6	Kifayat Ali Shah	GHSS, Pir Pai	13/11/1958	---Do---
5	9	Muhammad Ibrahim	GMS, Kotar Pan	07/07/1959	---Do---
6	10	Zahoor Ahmad	GHS, Zakhi Qabristan	27/05/1961	---Do---
7	11	Shafqat Ullah	GHS, Taru Jabba	03/07/1963	---Do---
8	13	Anwar Gul	GHS, Pir Sabaq	02/12/1970	---Do---
9	13A	Fazal Mehmood	GHS, Nawan Killi	2/13/1971	---Do---
10	14	Fazal Nawaz	GHS, Spin Khak	08/04/1969	---Do---
11	15	Muhammad Shahid	GHSS, Risalpur	17/03/1970	---Do---
12	16	Parvez ur Rahman	GMS, Kotli Khurd	15/02/1963	---Do---
13	17	Taj Wali Khan	GHS, Marhatti Banda	25/04/1964	2 ---Do---
14	18	Raham Sher	GHS, Parhoun Ghari	04/02/1968	---Do---
15	19	Khalil ur Rahman	GHS, Behram Killi	18/09/1970	---Do---
16	20	Malang Shah	GMS, Camp Koroona	30/11/1953	---Do---
17	21	Nisar Hussain	GHS, Ali Baig	12/12/1964	---Do---
18	22	Naseerud Din	GHS, Jarobu	01/02/1967	---Do---

REFLECTED

to be substituted bearing even No and date

PETs (M) Nowshakra

Sl. No.	Sl. No.	نام و پتہ	نام و پتہ	تاریخ	نوٹ
22	27	Muhammad Junaid Shah	GHS, No.1 NBR Kalan	15/02/1969	Do
24	28	Azmat Ali	GHS, Mohib Banda	05/03/1970	Do
25	29	Daftar Khan	GMS, Banda Nabi	01/02/1972	Do
26	30	Naseemuddin	GHS, Jehangira Road	11/04/1973	Do
27	31	Shah Faisal	GMS, Saadar Abad	01/09/1973	Do
28	32	Hameed-ur Rahman	GHS, No.2 NSR Cantt.	04/04/1973	Do
29	33	Muhammad Riaz	GHS, Mulla Killi	25/10/1972	Do
30	34	Iftikhar Ahmad	GHS, Afrido Killi	15/04/1975	Do
31	35	Anwar Dad	GMS, Palosi Payan	10/03/1973	Do
32	36	Haleem Ullah	GMS, Spin Kana Khurd	15/04/1972	Do
33	37	Umar Hayat	GHS, Aza Khel Bala	01/01/1969	Do
34	38	Irfan Ali	GMS, ASC Colony NSR	03/12/1974	Do
35	39	Sadrul Amin	GHSS, Kheshgi Payan	08/08/1972	Do
36	40	Asim Mehmood	GHS, No.2 NSR Kalan	10/12/1974	Do
37	41	Musarrat Shah	GHS, Khaisari	01/10/1974	Do
38	42	Maqsood Hayat	GHSS, Akbar Pura	18/09/1965	Do
39	43	Lal Said	GHS, Phari Katti Khel	21/01/1970	Do

Terms and conditions:-

- 1 They would be on probation for a period of one year extendable for another one year.
- 2 They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 3 Their services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be proceeded under the rules framed from time to time.
- 4 Charge report should be submitted to all concerned.
- 5 Their Inter-Se- seniority on lower post will remain intact.
- 6 No TA/DA is allowed for joining his duty.
- 7 They will give an under-taking to be recorded in their service book to the effect that if any over payment is made to him in light this order will be recovered and if he is wrongly promoted he will be reversed.

(Muhammad Rafiq Khattak)

Director

Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

4119-25

Endst: No. / File No.1/Promotion Senior PET B-16: Dated Peshawar the 21/02/2013.

Copy forwarded for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. District Education Officers (M) Nowshakra.
3. District Accountant Officer Nowshakra.
4. Official Concerned.
5. PS to the Secretary to Govt. Khyber Pakhtunkhwa E&SE Department.
6. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
7. M/File

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

ATTESTED

(17)

C

Promotion of PET BPS-15 to SPET BPS



OFFICE OF THE
DISTRICT EDUCATION OFFICER (MALE)
NOWSHERA

(Office Phocce#0923-9220228, Fax#0923-9220228)

NOTIFICATION

Consequent upon the recommendation of the Departmental Promotion Committee (DPC) and in pursuance of the Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department Notification No. 4119-25/File No.1/Promotion Senior PET B-16 dated Peshawar the 21-02-2013 the following Physical Education Teacher PET B-15 are hereby promoted to the post of Senior Physical Education Teacher SPET B-16 (Rs. 10000-800-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, in Teaching Cadre on the terms and conditions given below with immediate effect and further posted in the schools noted against each: -

S#	S.L#	Name	Present School	Place of Posting	Remark
01	50 ✓	Fazal Mchmood ✓	GMS Kandar	GHS Samandar Ghari	Promoted
02	101	Faridullah	GHS Samandar Ghari	GMS Kandar	Transfer

Terms and Conditions: -

1. They would be on probation for a period of one year extendable for another one year.
2. They will be governed by each rules and regulation as may be issued from time to time by Government.
3. Their services can be terminated at any time, in case his performance is found unsatisfactory during probationary period, in case of misconduct, he shall be preceded under the rules from time to time.
4. Charge report should be submitted to all concerned.
5. Their Inter-Se-seniority on lower post will remain intact.
6. No TA / DA is allowed for joining his duty.
7. They will given an under taking to recorded in their service book to the effect that if any over payment is made to him in the light of this order will be recovered and if he is wrongly promoted he will be reversed.

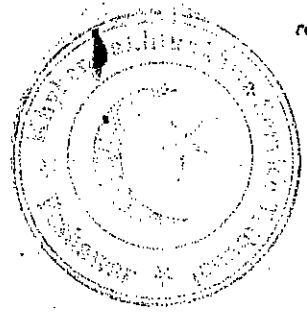
(Muhammad Saeed Khan)
District Education Officer (Male)
Nowshera

Endst: No. 4695-98 / DEO(M)NSR/EA-S/File No.1/Promotion PET B-16. Dated Nowshera the 27/5/2013

- Copy of the above is forwarded for information and necessary action to the: -
- 1: Director, Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
 - 2: Senior District Accounts Officer, Nowshera.
 - 3: Deputy District Education Officer (Male), Local Office.
 - 4: Principal / Head Master Concerned.
 - 5: Officials Concerned.

ESTED

District Education Officer (Male)
Nowshera



D

BEFORE THE HONORABLE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA

Service Appeal No. 205 / 2018

Khyber Pakhtunkhwa Service Tribunal

Diary No. 204

Dated 14-2-2018

Fazal Mahmood, SPET, Government High School, Samander Garhi, District Nowshehra

Versus

1. The Government of Khyber Pakhtun Khwa through Secretary E&SL, Peshawar
2. The Director E&S, Directorate E&S, Peshawar
3. The District Education Officer, Nowshehra
4. District Accounts Officer, Nowshehra.

[Signature]
ATTESTED

Appeal under section 4 of the Service Tribunal Act, 1974 whereby the Respondents have given no attention to the Representation made to them by the Appellant, for the grant of graded pay and consequential benefits.

Filed to-day

Registrar
14/2/18

On Acceptance of this Appeal, this Honorable Court may please hold the Appellant entitled for the award of graded pay and all the benefits attached to it.

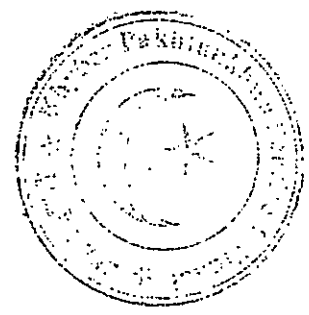
[Signature]
Khyber Pakhtunkhwa Service Tribunal, Peshawar

Respectfully Sheweth,

1. That the Appellant was appointed on 20/10/1993, against the Post of PET in BPS -9 by the Respondents department on fixed pay, and since then he is serving the department with zeal and devotion. (Copy of the appointment Order is annexed as Annexure "A").

It is important to mention that during the days of Appellant's appointment, there were available no trained teachers and the Respondent Department had

Appeal No. 205/2018
Fazal Mahmood vs Govt



21.11.2019 Appellant with counsel present. Mr. Zia Ullah learned Deputy District Attorney for the respondents present. Appellant submitted application for withdrawal of the present service appeal with the permission to file fresh appeal if needed under the circumstances. Application is placed on record. The ground mentioned in the application appear to be genuine hence the application is accepted and the present service appeal is dismissed as withdrawn with the permission to file fresh service appeal subject to all legal objection. Parties are left to bear their own costs. File be consigned to the record room.

Date of Presentation of Appeal: 25/11/19
Number of Voucher: 882
Copying Fee: 10/-
Urgent: /
Total: 10/-
Name of Officer: /
Date of Copy: 03-12-19
Date of Delivery of Copy: 03-12-19

[Signature]
(Hussain Shah)
Member

Certified to be true copy

[Signature]
(M. Amin Khan Kundi)
Member

Announced
21.11.2019

[Signature]
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

Note
All cases

[Signature]
6/11/19

[Signature]

ATTESTED

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) NOWSHERA

FINAL SENIORITY LIST PHYSICAL EDUCATION TEACHERS IN DISTRICT NOWSHERA

S.No.	Name of School	Teacher Name	Father's Name	Domicile	BPS	Academic Qual:	B.A with Division	Prof. Qual:	M.A with Subject	Date of Birth	Date of 1st Appt: In Edu: Dept:	Date of taking over charge against the present Post / Distt:	Date of regular Appt: against the Post	Date of Preomotion as SPET	P.No	CNIC NO	Cell
1	GMS, Siavi	Muhammad Anwar Khan	Mir Azam Khan	NSR	15	M.A	3rd	JDPE	Islamyat	15/08/1967	07/04/1988	16/04/1988	16/04/1988		133559	17201-1565388-5	0306-5935595
2	GHS Pabbi	Liaqat Ali	Gul Rang	NSR	16	B.A	2nd	JDPE	NIL	02/12/1964	02/02/1986	22/05/1988	22/05/1988	28/02/2013	135104	17201-2299217-3	0321-9737218
3	GHSS, Zakhi Oabristan	Zahoor Ahmad	Sher Khan	Pesh	16	M.A	2nd	JDPE	Pashto	27/05/1961	07/05/1987	14/11/1990	14/11/1990	28/02/2013	133472	17301-1499438-1	0307-7497566
4	GHSS, Pir Sabaq	Anwar Gul	Muhammad Shah	Pesh	16	B.A	3rd	SDPE MSC HPE	NIL	02/12/1970	28/10/1989	22/10/1991	22/10/1991	28/02/2013	133895	17301-1611933-5	0345-9199107
5	GHS, Behram Killi	Khalil ur Rahman	Faqir Muhammad	NSR	16	B.A	2nd	JDPE / B.Ed		18/09/1970	15/03/1992	09/01/1995	09/01/1995	28/02/2013		17201-2098122-9	0347-9715781
6	GHS, Marhatti Banda	Taj Wali Khan	Badam Gul	NSR	16	M.A	2nd	B.Ed JDPE	Pashto	25/04/1964	06/12/1989	25/05/1995	25/05/1995	28/02/2013	134295	17201-2311159-1	0333-9032401
7	GHSS, Pahtoon Ghari	Raham Sher	Siraj ul Haq	NSR	16	B.A	2nd	B.Ed	MSC HPE	04/02/1968	19/05/1990	25/05/1995	25/05/1995	28/02/2013	138745	17201-12125855-3	0313-9282052
8	GHS No:1 Nowshera Cantt	Noor Muhammad	Ghareeb Ullah	NSR	16	M.Phi I/M.S	2nd	HPE/B.Ed	Pashto, Pol	15/09/1972	22/01/1996	29/01/1996	29/01/1996	28/02/2013	139165	17201-2287792-7	0300-5866059
9	GHS, Ali Baig	Nisar Hussain	Abdul Ghaffar	NSR	16	M.A	3rd	B.Ed	Islam	12/12/1964	30/11/1989	30/08/1996	30/08/1996	28/02/2013	133920	17201-6979099-7	0333-4915587
10	GHS, Jarooba	Naseer ud Din	Musharraf Din	NSR	16	M.A	2nd	SDPE, M.Sc, B.Ed	HPE, Pashto	01/02/1967	28/03/1992	30/08/1996	30/08/1996	28/02/2013	138633	17201-2219716-5	0315-9784879
11	GSMFHS Taru Jabba	Zafar ullah	Sharif Gul	NSR	16	MA	2nd	B.Ed	Pashto M.SC	11/11/1968	24/03/1992	30/08/1996	30/08/1996	28/02/2013	139005	17201-2102787-7	0333-9040678
12	GHS, Bara Banda	Naik Muhammad	Faqir Gul	NSR	16	MA	2nd	JDPE B.ED	Pashto	10/08/1960	12/10/1989	13/05/1997	13/05/1997	28/02/2013	133722	17201-2179770-3	0313-9834805
13	GHS No:1 Nowshera Cantt	Khairullah Khan	Hakeem Khan	NSR	16	M.A	2nd	JDPE MSC	Pashto	14/04/1968	21/03/1992	13/05/1997	13/05/1997	28/02/2013	138956	17201-5112905-9	0313-9834805
14	GHSS No.1 NSR Kalan	S. Muhammad Junai	S. Ghulam Mustaf	NSR	16	B.A	2nd	JDPE	NIL	15/02/1969	23/01/1995	13/05/1997	13/05/1997	28/02/2013			
15	GHSS Pir Pai	Azmat Ali	Ghaffar Ali	NSR	16	MPED	2nd	B.Ed	du M.Sc H	05/03/1970	14/03/1993	13/05/1997	13/05/1997	28/02/2013		17201-2186059-9	0300-9398491
16	GHS Wazir Ghari	Daftar Khan	Hareef Khan	NSR	16	MSc	2nd	SDPE	HPE	01/02/1972	10/03/1993	13/05/1997	13/05/1997	28/02/2013			0344-4745875
17	GHSS No.2 NSR Cantt	Hameed ur Rahman	Aziz ur Rahman	NSR	16	M.A	2nd	JDPE	Urdu M.Sc	04/04/1973	27/06/1997	27/06/1997	27/06/1997	28/02/2013	137737	17201-2127386-1	0333-9040557
18	GHS Nawar Killi	Shah Faisal	Mir Jaffar Khan	NSR	16	M.Sc	2nd	SDPE B.Ed	HPE	01/09/1973	26/06/1997	26/06/1997	26/06/1997	28/02/2013	141112	17201-226618-5	0344-4745875
19	GHS, Mulla Killi	Muhammad Riaz	Noor Muhammad	NSR	16	M.A	2nd	MHPED/ SDPE / JDPE	Pashto, Pak Study	25/10/1972	01/07/1997	01/07/1997	01/07/1997	28/02/2013			0334-9428242
20	GHS, Jehangira Road	Naseem ud din	Islam ud Din	NSR	16	M.SC	2nd	SDPE	HPE	11/04/1973	26/06/1997	26/06/1997	26/06/1997	28/02/2013	141191	17201-214057-1	0334-9428242
21	GHSS Rashakai	Ifthikhar Ahmad	Mira Khan	NSR	16	M.A	2nd	SDPE	M.SC	15/04/1975	03/07/1997	03/07/1997	03/07/1997	28/02/2013	139190	17201-2127386-1	0334-9428242
22	GHSS Manki Sharif	Anwar Dad	Sher Dad	NSR	16	B.A	2nd	JDPE	NIL	10/03/1973	04/07/1997	04/07/1997	04/07/1997	28/02/2013	139197	17201-2251591-7	0334-7273744

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) NOWSHERA
FINAL SENIORITY LIST PHYSICAL EDUCATION TEACHERS IN DISTRICT NOWSHERA

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
S.No	Name of School	Teacher Name	Father's Name	Domicile	BPS	Academic Qual.	B.A with Division	Prof. Qual.	M.A with Subject	Date of Birth	Date of 1st Appt. in Edu. Dept.	Date of taking over charge present Post / Dist.	Date of regular Appt. against the Post	Date of Promotion as SPET	P.No	CNIC NO	Cell	
23	GHS Manahi	Haleem Ullah	Imad ud Din	NSR	16	B.A	2nd	JDPE	NIL	15/04/1972	29/09/1997	29/09/1997	29/09/1997	28/02/2013	139212	17201-2200575-3		
24	GHS Akbar Pura	Umar Hayat	Abdus Sattar	NSR	16	B.A	2nd	RDE Edu Dpt.	NIL	01/01/1969	18/04/1993	27/02/1998	27/02/1998	28/02/2013	0311-9161576			
25	GHS dhert Kaiti		Taj Ali	NSR	16	BA	2nd	PET		03/12/1974	26/06/1997	27/02/1998	27/02/1998	28/02/2013	139164	17201-2083563-9006949	0333-9161576	
26	GHS No.2 NSR Kalan	Asim Mehmood	Abdul Khalig	NSR	16	B.A	3rd	JDPE	NIL	10/12/1974	07/04/1999	07/04/1999	07/04/1999	28/02/2013	138055	17201-4617983-5	0335-0456417	
27	GHS, Khaizari	Musarat Shoh	Musammer Shah	NSR	16	M.A	2nd	JDPE	Pasho	01/10/1971	09/04/1999	09/04/1999	09/04/1999	28/02/2013	138055	17201-7478486-7	0313-9588510	
28	GHS, Akbar Pura	Magsood Hayat	Muhammad	NSR	16	M.A	2nd	M.Sc B.ED	HPE	18/09/1965	28/12/1987	11/05/1999	11/05/1999	28/02/2013	133296	17201-2120801-9	0313-9588510	
29	GHS, Pahari Kaiti	Lal Said	Gul Aban	NSR	16	B.A	2nd	JDPE	NIL	21/01/1970	07/01/1995	11/05/1999	11/05/1999	28/02/2013	140521	17201-4083522-9	0344-8977204	
30	GHS, Khair Abad	Taskeen Ullah	Kiramat Shah	NSR	16	M.Sc	2nd	SDPE	HPE	12/02/1975	13/12/1999	13/12/1999	13/12/1999	29/05/2013	141223	17201-3233938-1	0345-9345672	
31	GHS, No.1 Shaidu	Muhammad Arshad	Naseeb Shah	NSR	16	B.A	2nd	JDPE	MP ed	15/03/1974	09/12/1999	14/12/1999	14/12/1999	20/08/2016	141242	17201-9462737-7	0346-9543774	
32	GHS, Zara Miama	Rehan Ali	Multan Khan	NSR	16	M.Sc	2nd	SDPE		05/05/1968	21/11/1994	25/04/2000	25/04/2000	20/08/2016	140447	17201-2094705-3	0346-5657712	
33	GHS Samandar Gharti	Fazal Mehmood	Mehmood	NSR	16	M.Sc	2nd	HPE/B.ed	Pasho	13/02/1971	20/10/1993	25/04/2000	25/04/2000	27/08/2013	140209	17201-2181009-7	0311-9161576	
34	GHS, Sheikhan	Aslam Jan	Toorsam Khan	NSR	16	MA	2nd	JDPE	Pasho	03/04/1967	12/01/1988	22/05/1989	01/05/2000	20/08/2016	138373	17101-7732619-9	0314-9019355	
35	GHS, Dogri Banda	Fazil Ullah	Atab Khan	NSR	16	M.A	2nd	B.ED	Pak Study	24/12/1970	24/11/1996	31/03/2002	31/03/2002	20/08/2016				
36	GCMS Akora	Khatak	Nemul Wakeel	NSR	16	B.Sc	3rd	JDPE BED		05/12/1976	24/09/2002	24/09/2002	24/09/2002	08/02/2017	139585	17201-2094353-5	0333-5222975	
37	GHS, Zando Banda	Muhammad Saleem	Abdul Rahman Khan	NSR	16	B.A	3rd	JDPE		18/04/1977	24/09/2002	24/09/2002	24/09/2002	08/02/2017	139585	17201-2094353-5	0333-5222975	
38	GHS Mali Khel Bala	Muhammad Ayaz	Khan Muhammad	NSR	16	MSC	2nd	SDPE	HPE	07/01/1982	24/09/2002	24/09/2002	24/09/2002	08/02/2017	141721	17201-2192498-5	0333-9043718	
39	GHS Walai	Muhammad Tariq	Muhammad	NSR	15	F.A	---	P.E.T	NIL	03/02/1962	24/09/2002	24/09/2002	24/09/2002	08/02/2017	141721	17201-2192498-5	0333-9043718	
40	GHS Watar	Muhammad Ashiq	Muhammad	NSR	15	B.A	3rd	JDPE	NIL	02/04/1970	28/05/1995	24/09/2002	24/09/2002	03/03/2019	141663	17201-2234453-9	0333-8804351	
41	GHS, Ziarat Kaka	Hamid Ali Shah	Mir Azam Shah	NSR	16	M.Sc	2nd	JDPE	NIL	02/02/1976	25/09/2002	25/09/2002	25/09/2002	08/02/2017	155111	17201-2927811-1	0315-2123241	
42	GHS, Koili Saleh	Aliq Hussain	Sabir Gul	NSR	16	M.Sc	2nd	SDPE, B.ED	HPE	04/04/1976	24/09/2002	25/09/2002	25/09/2002	08/02/2017	139345	17201-7924483-3	0344-916164	
43	GSMSHS Toru	Fazil Akbar	Pardal Khan	NSR	16	M.Sc	2nd	SDPE	HPE	01/05/1976	25/09/2002	25/09/2002	25/09/2002	08/08/2017	139345	17201-7924483-3	0344-916164	
44	GSAAHS, Dag Behsud	Muhammad Tariq	Sher Afzal Khan	NSR	16	M.Sc	2nd	SDPE	HPE	08/10/1976	25/09/2002	25/09/2002	25/09/2002	08/08/2017	139345	17201-7924483-3	0344-916164	

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1	2	3	4	5	6	7	8	9	10	11	12	13	14	16	17	18	19
S.No.	Name of School	Teacher Name	Father's Name	Domicile	B.P.S	Academic Qual.	B.A with Division	Prof. Qual.	M.A with Subject	Date of Birth	Date of 1st Appt. in Edu. Dept.	Date of taking over charge against the present Post / Distt.	Date of regular Appt. against the Post / SPET	Date of Promotion as	P.No	CNIC NO	Cell
45	GHS Shah Kot	Dilwar Khan	Sarwar Khan	NSR	16	B.A	2nd	J.D.P.E	NIL	09/09/1977	24/09/2002	25/09/2002	25/09/2002	04/03/2019	139344	17201-2200994-3	0321-
46	GSSSHS DI KHE:L	Zarwaih Khan	Hancca Khan	NSR	16	B.A	2nd	J.D.P.E	NIL	16/04/1978	24/09/2002	25/09/2002	25/09/2002	10/04/2019	141722	17201-12130436-9	9894980
47	GHS Kolar Pan	Subhan Ali	Kachkol Khan	NSR	16	MA		M.Sc (HPE)M.ED	Pashio	15/02/1980	24/09/2002	25/09/2002	25/09/2002	10/04/2019	141722	17201-3307001-7	9027945
48	GHS Gauri	Samr Ullah	Nale Dar	NSR	15	MA		B.ed	Urdu	19/05/1980	25/09/2002	25/09/2002	25/09/2002	10/04/2019	141722	17201-2247926-9	9894980
49	GHS Banda Nabi	Muhammad Tahir Khan	Zarghan Shah	NSR	15	M.Sc	2nd	B.Ed/S.D.P.E	HPE	10/02/1981	25/09/2002	25/09/2002	25/09/2002	10/04/2019	141725	17201-2183663-3	8505464
50	GMS Shabara	Rahat Ullah Khan	Asad Ullah Khan	NSR	15	M.A	2nd	J.D.P.E M.ED	Pashio	15/02/1980	24/09/2002	25/09/2002	25/09/2002	10/04/2019	141724	17201-4621773-5	9036613
51	GHS Islamabad	Atta Muhammad Khan	Saif ur Rahman	NSR	15	B.A	3rd	D.P.E D.Ex Army	NIL	20/11/1962	24/09/2002	26/09/2002	25/09/2002	10/04/2019	141727	17201-2247926-9	9894980
52	GMS Shawangi	Roghan Shah	Mehraban shah	NSR	15	M.A	2nd	Ex PAF	Islamiat	04/08/1966	24/09/2002	26/09/2002	26/09/2002	10/04/2019	141732	17201-1217319-7	9740668
53	GHS Risalpur	Zahir Shah	Chiragh Shah	NSR	15	M.A	2nd	J.D.P.E	Pashio	08/01/1976	24/09/2002	26/09/2002	26/09/2002	23/12/2020	139588	17201-22656853	5155690
54	GMS Bakrcal	Manzoor Ahmad	Kashmir Khan	NSR	15	BA		J.D.P.E		01/04/1976	03/01/2000	26/09/2002	26/09/2002	23/12/2020	141386	17201-2211430-3	9074627
55	GHS Hancca Rashaka	Naveed Khan	Samir Khan	NSR	15	MA	2nd	J.D.P.E/S.D.P.E	M.Sc	15/04/1976	24/09/2002	26/09/2002	26/09/2002	23/12/2020	141386	17201-2325620-9	5457722
56	GMS Dak Ismail Khel	Manzar Elahi	Mian Fazle Elahi	NSR	15	B.A	1st	J.D.P.E	NIL	03/04/1977	24/09/2002	26/09/2002	26/09/2002	23/12/2020	141723	17201-6219808-5	2899197
57	GHS Mohib Banda	Shah Zaman	Sameen Khan	NSR	15	MA	2nd	J.D.P.E	Pashio	18/04/1978	24/09/2002	26/09/2002	26/09/2002	23/12/2020	141717	17201-2162576-3	8858305
58	GHS Risal Pur	Inran Khan	Abdus Salam	NSR	15	M.A	2nd	J.D.P.E M.ED	HPE	01/04/1980	24/09/2002	26/09/2002	26/09/2002	23/12/2020	139589	17201-2133332-9	9596475
59	GHS Pabbi	Tariq Ahmad	Nasrullah	NSR	15	M.Sc		B.Ed	HPE	16/01/1975	24/09/2002	27/09/2002	27/09/2002	23/12/2020	139584	17201-2079884-7	9009157
60	GHS Incari	Taj Wali Khan	Sher Wali Khan	NSR	15	B.A	2nd	J.D.P.E	NIL	15/08/1977	24/09/2002	27/09/2002	27/09/2002	23/12/2020	139584	17201-2079884-7	9009157
61	GHS ASC Colony	Ibram Ullah	Mir Aslam	NSR	15	M.Sc	2nd	S.D.P.E	HPE	28/03/1979	24/09/2002	27/09/2002	27/09/2002	23/12/2020	141729	17201-159027-9	5801310
62	GHS Hisarlang	Banaras Khan	Abul Hamid	NSR	15	B.A	2nd	Army		20/11/1962	24/09/2002	01/10/2002	01/10/2002	23/12/2020	141718	17201-2264500-5	5778011
63	GHS Banda Sheikh Ismail	Asad Iqbal	Maskeen Khan	NSR	15	M.Sc	2nd	J.D.P.E	HPE	07/11/1979	09/03/2004	10/03/2004	10/03/2004	23/12/2020	140196	17201-2093708-3	8787091
64	GHS Kandi Taca Din	Khadim Ali	Kachkol Khan	NSR	15	M.Sc	2nd	S.D.P.E/HPE	Pashio	01/05/1984	09/03/2004	12/03/2004	12/03/2004	23/12/2020	141966	17201-2093708-3	8787091
65	GCMHS Akora	Muhammad Saeed Khan	Mansifdar Khan	NSR	15	MA		B.Ed	Islamiat	01/05/1978	09/03/2004	13/03/2004	13/03/2004	23/12/2020	141966	17201-2093708-3	8787091
66	GMS Pabbi	Zahid Hussain	Hussain	NSR	16	MA	2nd	S.D.P.E	Pashio, H.P.E	10/08/1979	13/03/2004	13/03/2004	13/03/2004	23/12/2020	141966	17201-2093708-3	8787091
67	GSMWHS Pir Piai	Sher Asghar	Sher Asfar Khan	NSR	15	M.Sc	2nd	S.D.P.E	HPE	03/10/1979	09/03/2004	13/03/2004	13/03/2004	23/12/2020	141966	17201-2093708-3	8787091

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S.No.	Name of School	Teacher Name	Father's Name	Domicle	BPS	Academic Qual:	B.A with Division	Prof. Qual:	M.A with Subject	Date of Birth	Date of 1st Apptt: in Edu: Deptt:	Date of taking over charge against the present Post / Distt:	Date of regular Apptt: against the Post	Date of Preomotion as SPET	P.No	CNIC NO	Cell
68	GHS Khesghi Bala	Irfan Ali	Liaqat Ali	NSR	15	M.A	2nd	M.Ed	Pashto, Eng	15/03/1980	09/03/2004	13/03/2004	13/03/2004				
69	GMS Shaidu	Zulfiqar Ali	Khan Muhammad	NSR	15	M.Phil		B.ED	HPE	04/01/1981	09/03/2004	13/03/2004	13/03/2004		142009	17201-5081608-1	0312-6766683
70	GMS Gul Dhari	Rahim Nawaz	Raz Muhammad	NSR	15	M.A	2nd	JDPE	Pashto	01/04/1983	09/04/2010	18/10/2004	18/10/2004		111630	17201-2282730-7	0345-9322064
71	GMS Aza Khel Bala	Nasir Iqbal	Lal Muhammad	NSR	15	M.SC		B.ED/SDP	HPE	03/12/1976	27/08/2005	01/09/2005	01/09/2005		207832	17201-2089856-1	0333-3885599
72	GMS Kandar	Rehman Sher	Noor shaid Khan	NSR	15	B.A	2nd	SDPE M.Sc	'IL	26/03/1980	27/08/2005	01/09/2005	01/09/2005				0333-9018909
73	GHS Saadat Abad	Tahir Ali	Taj Muhammad	NSR	15	M.A	2nd	B.ed	Islamyat	14/05/1982	27/08/2005	01/09/2005	01/09/2005		207882	17201-1098154-9	0321-9740646
74	GMS Sheikh Ahmad Baba	Noor un Nabi	Muhammad Amin	NSR	15	MA	2nd	SDEP/Med	Islamyat	06/03/1983	27/08/2005	01/09/2005	01/09/2005		207822	17201-23104247	0344-9140894
75	GMS Aman Garh	Fazli Raziq	Amin ul Haq	NSR	15	MSC		SDPE	HPE	31/03/1979	27/08/2005	03/09/2005	03/09/2005		209369	17201-2153301-5	0314-7989033
76	GSWIH TARKHA	Imran Khan	Abdul Ghafoor	NSR	15	MA	2nd	SDPE	HPE	01/07/1982	03/09/2005	03/09/2005	03/09/2005		213586	17201-2087532-3	0314-3139595
77	GHS, Misri Banda	Istiraj Muhammad	Nazar Muhammad	NSR	15	B.A	3rd	SDPE		12/02/1970	03/01/2006	09/01/2006	09/01/2006		382886	17201-4099456-1	0321-9745698
78	GMS Machine Koorna	Farzand Ali	Siraj Muhammad	NSR	15	M.A	2nd	SDPE		15/10/1983	19/05/2006	23/05/2006	23/05/2006		344187	17201-6251204-5	0345-9503282
79	GMS Kishiti Pul	Fakhr e Alam Jan	Qalam Khan	NSR	15	MA		B.Ed	Islam	10/02/1976	21/05/2007	22/05/2007	22/05/2007		556842	17201-2261687-9	0300-9041217
80	GMS Aziz Abad	Saeed Khan	Shah Nazar Khan	NSR	15	B.A	2nd	JDPE	NIL	04/04/1967	10/02/1999	09/04/2010	09/04/2010		382886	17201-4099456-1	0321-9735564
81	GHS Spin Kana Khurd	Jehanzeb Shah	Muhammad Rafta Shah	NSR	15	M.A	2nd	JDPE	Urdu	02/06/1977	09/04/2010	12/04/2010	12/04/2010		549264	17201-2308846-1	0346-5660165
82	GMS Khesghi Payan	Farid Ullah	Muhammad Bashar	NSR	15	MA	2nd	M.Ed/JDP	Pashto	08/02/1979	09/04/2010	12/04/2010	12/04/2010		545204	17201-2102603-3	0340-9112649
83	GHS Gandary Payan	Gul Khan	Juma Khan	NSR	15	B.A	2nd	JDPE B.ED	NIL	20/01/1980	09/04/2010	12/04/2010	12/04/2010		53006	17201-2295717-9	0345-4838497
84	GMS Malik Aman Korona	Noor Hayat	Pervez Habib	NSR	15	MA	1st	Bed	Urdu	12/10/1981	09/04/2010	12/04/2010	12/04/2010		512095	17201-2127531-5	0315-9735974
85	GHS Aman Garh	Farhan Ahmad	Mushtaq Ahmad	NSR	15	M.Sc	2nd	JDPE BEd	HPE	01/10/1985	09/04/2010	12/04/2010	12/04/2010		510736	17201-8506389-9	0300-5914451
86	GMS Mehraji Bala	Azam Khan	Aqal Khan	NSR	15	MA	2nd	B.ED/JDP	English	01/08/1986	09/04/2010	12/04/2010	12/04/2010		545257	17201-8513938-7	0314-5858401
87	GHSS, No.1 Shaidu	Nikayat Khan	Murtaza Khan	NSR	15	M.A	2nd	JDPE	Islamyat	01/03/1984	28/05/2010	31/05/2010	31/05/2010		549290	17201-5218928-1	0321-9158848
88	GMS Gul Bahar	Aamer Muhammad	Abdul Tawab	NSR	15	BA	2nd	JDPE		22/01/1986	28/12/2010	29/12/2010	29/12/2010				0344-4343445
89	GHSS Khesghi Payan	Shahid Kamal	Azam Khan	NSR	15	M.A	1st	JDPE	Pashto	03/01/1974	05/12/1992	25/05/2012	26/05/2012		526058	17201-8506042-1	0313-9696880
90	GHS Mian Essa	Sameen Jan	Noor Khan	NSR	15	M.A	2nd	B.Ed	Pol.Sc, Pashto	01/02/1987	25/05/2012	26/05/2012	26/05/2012	ETEA	584889	17201-7836064-3	0313-9647477

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S.No.	Name of School	Teacher Name	Father's Name	Domicile	BPS	Academic Qual:	B.A with Division	Prof. Qual:	M.A with Subject	Date of Birth	Date of 1st Apptt: in Edu: Deptt:	Date of taking over charge against the present Post / Distt:	Date of regular Apptt: against the Post	Date of Preomotion as SPET	P.No	CNIC NO	Cell
91	GHS Kurvi	Ihsan Ullah	Hanif Gul	NSR	15	MA		MEd	Politicals ci)	02/01/1981	25/05/2012	28/05/2012	28/05/2012	ETEA	693928	17201-2087464-1	0314-5201058
92	GMS Chowki Darb	Anees ur Rahman	Fazle Khuda	NSR	15	M.A	1st	B.ed		25/09/1980	25/05/2012	28/05/2012	28/05/2012	ETEA	697536	17301-1365937-9	0348-5459873
93	GHS Adam Zai	Ikram ud Din	Rehman ud din	NSR	15	B.A		JDPE		12/12/1978	07/01/2000	01/07/2013	01/07/2013		319250	17201-20859617	0313-9653395
94	GHS Marooba	Abdus Saboor	Nisar Hussain	NSR	15	M.A	2nd	JDPE	Islamiat	06/11/1981	09/06/2014	10/06/2014		28/04/1900	729153	17201-2323189-7	0313-9899095
95	GMS Meshak	Muhammad Ikhtlaq	Khan Muhammad	NSR	15	M.sc		BPED	HPE	15/02/1986	09/06/2014	10/06/2014		27/04/1900	732797	17201-0993012-9	0314-9818517
96	GMS Makin Abad	Muhammad Sohail	Ghulam Sarwar	NSR	15	BSc	1st	B.Ed/JDP		27/03/1980	13/05/2017	14/06/2014		05/05/1900	725484	17201-2314966-9	0333-9318936
97	GMS Banda Mallahan	Mumtaz Ali	Raj Wali Khan	NSR	15	M.A	2nd	Army M.ED	Polii/HP E	17/07/1983	05/07/2014	10/07/2014	10/07/2014		723923	17301-1316030-1	0307-7123288
98	GMS Turlandi	Shah Khalid	Rashid Ul Ghafoor	NSR	15	BA	2nd	JDPE		21/12/1982	13/05/2017	15/05/2017	15/05/2017				
99	GHS Camp Koroona	Muhammad Rashid	Hassan Muhammad	NSR	15	MA	2nd	JDPE BED	Islamiat	07/04/1981	28/05/2012	13/05/2017	16/05/2017		693174	17201-2230239-5	0321-5511256
100	GHS NO.2 Shaidu	Salman Ahmad	Anwer Gul Durrani	NSR	15	M.A	2nd	JDPE B.Ed	Urdu, Isla m	15/04/1982	27/04/2016	13/05/2017	16/05/2017		806396	17201-7477593-3	0333-9006857
101	GHS Bakhtai	Hidayat Ali	Inayat Khan	NSR	15	MA		JDPE	Islamiat	05/09/1988	13/05/2017	16/05/2017	16/05/2017		855416	17201-2060936-7	0307-3139696514
102	GMS Tangi khattak	Wasim Khan	Sultan	NSR	15	M.sc	1ST	B.ed	HPE HISTORY	15/04/1989	12/09/2015	16/05/2017	16/05/2017		749401	17201-0276010-9	0347-8042685
103	GMS Arif Abad	Muhammad Ghayur	Faiz Ali	NSR	15	M.sc	2nd	JDPE/M.ed		03/09/1990	29/01/2016	13/05/2017	16/05/2017				
104	GHS Gharib Pura	Irshad Khan	Ajmal Khan	NSR	15	MA		B.ED		16/10/1975	14/02/2017	17/02/2017	14/03/2018		844639	17201-2152276-9	0346-5651252
105	GHS Chashmai	Muhammad Imran Khan	Haji Muzaffar Khan	NSR	15	MA	2nd	JDPE		05/05/1977	13/05/2017	16/05/2017	14/03/2018				0332-9045502
106	GHSS Jabbi	Muhammad Nadeem	Muhammad Faiz	NSR	15	M.A	2nd	JDPE B.ED		10/12/1979	03/10/2014	16/05/2017	14/03/2018		743362	17201-2319900-5	0315-9273292
107	GHS Jabba Khusk	Fida Hassan	Muhammad Hassan	NSR	15	M.A	2nd	JDPE/B.Ed		03/05/1980	13/05/2017	13/05/2017	14/03/2018		855417	17201-2322052-3	0313-9004250
108	GHS Darwazgai	Jaffar Shah	Muhib Shah	NSR	15	MA		B.ED MPED	English	22/04/1987	13/05/2017	16/05/2017	14/03/2018		860025	17201-0102302-7	0321-9778129
109	GMS Titara	Amad Ali	Sanobar	NSR	15	MA		JDPE	Islamiat	08/08/1989	13/05/2017	16/05/2017	14/03/2018		854857	17201-2500819-9	0321-9778129
110	GHS Khawrai	Ihtisham ur Rahman	Waheed ur Rehman	NSR	15	MSc	2nd	DP.Bed		01/07/1994	15/05/2017	15/05/2017	14/03/2018		869430	17201-0999235	0315-1954488
111	GMS Ajab Bagh	Rahmat Ullah	Murtaza Khan	NSR	15	BA	2nd	JDPE		20/09/1971	06/05/1996	16/04/2018	16/04/2018	PST	141125	2203935-3	0301-8939221
112	GMS Aman Kor	Sharif Ullah	Habib Ullah Khan	NSR	15	B.A	2nd	JDPE B.ED		04/08/1969	31/10/1995	16/04/2018	17/04/2018		148077	17201-2313996-5	0301-8939221
113	GHS PALOSI PAAYAN	Muhammad Shoaib	Zamrud Khan	NSR	15	M.A	2nd	M.ED	Sociology	01/10/1988	13/05/2017	04/01/2019	04/01/2019		881133	15602-1965328-5	0335-1573083

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114	GMS Spin Kana Kolan	Muhammad Nauman Khattak	Sher Ghulam Khattak	NSR	15	BSc(Hi	2nd	M.Ed	(IT)	13/10/1981	04/01/2019	08/01/2019	08/01/2019		902486	14301-9227465-3	0333-9629342
115	GMS Khush Maqam	Amjad Ali	Safdar Khan	NSR	15	MBA	1st		Econ	21/01/1985	04/01/2019	08/01/2019	08/01/2019		906892	17201-4833689-3	0317-5619608
116	GHS Sadiq Abad	Khan Ayaz Khan	Nisar Khan	NSR	15	MS		B.ED	Mang:	25/03/1985	04/01/2019	08/01/2019	08/01/2019		903843	17201-4644107-7	
117	GMS Meraji Bala	Ihtisham	Anwar Khan	NSR	15	BS		B.Ed	Computer	27/03/1989	04/01/2019	08/01/2019	08/01/2019	NTS			
118	GMS Shahab Khel	Saheem Zafar	Zafar Ali	NSR	15	BS			E/Engineer	15/02/1990	04/01/2019	08/01/2019	08/01/2019		902476	17201-64996505	0303-4441677
119	GMS Sadu Khel	Kamran Bahadar	Khan Bahadar	NSR	15	BS		B.Ed	Computer	12/03/1990	04/01/2019	08/01/2019	08/01/2019		907104	17201-6303839-1	300-5530678 0344-5690906
120	GMS Jungri	Habib Ullah	Gul Akbar	NSR	15	BBA				15/04/1990	04/01/2019	08/01/2019	08/01/2019		906903	17201-7639806-1	0302-8099299
121	GHS Kahi	Haroon ud Rashid	Munawar Khan	NSR	15	BSc			ME	01/06/1990	04/01/2019	08/01/2019	08/01/2019		905617	17201-2116985-9	0300-9068026
122	GMS Jabba Daudai	Shah Faisal	DilFaraz Khan	NSR	15	BE	1st		Elec	03/04/1991	04/01/2019	08/01/2019	08/01/2019		904584	17201-6561461-7	0345-9065601
123	GMS Chowki Munraz	Syed Suhaail Shah	Syed Zahoor Shah	NSR	15	BS				01/01/1993	04/01/2019	08/01/2019	08/01/2019		906904	17201-9367204-1	0308-2977053
124	GMS Kahi	Shams ur Rehman	Munawar khan	NSR	15	BSC				01/09/1993	04/01/2019	08/01/2019	08/01/2019		906905	17201-0121920-1	0303-8243224
125	GHS Khat Killi	Fazal Rehman	Dilaram Khan	NSR	15	BS				09/03/1994	04/01/2019	08/01/2019	08/01/2019		906670	17201-3495266-7	0300-5530678
126	GMS Kotli Khurd	Muhammad Hassan Khan	Fazal Karim	NSR	15	MSc				27/03/1984	04/01/2019	09/01/2019	09/01/2019		472188	17201-4078993-7	0333-5335013
127	GMS Ali Abad	Waqas Alam	Fazal Halim	NSR	15	FSc		B.ED		17/02/1990	04/01/2019	09/01/2019	09/01/2019		906894	17201-4620598-5	
128	GHS Baghban Pura	Muhammad Afan	Tariq Anwar	NSR	15	BS		PET		12/06/1991	09/01/2019	09/01/2019	09/01/2019		902677	17201-4279085-9	0333-9048485
129	GHS Kana Khel	Shahid Khan	Taj ud Din	NSR	15	BS	2nd		Chem	14/01/1992	04/01/2019	09/01/2019	09/01/2019	NTS	905861	17201-6419778-3	0306-5009529
130	GMS Bahadar Khel	Junaid Khan	Jan Muhammad	NSR	15	BS			Engineer	01/03/1994	04/01/2019	09/01/2019	09/01/2019	NTS			
131	GHS Mughalki	Wajas Khan	Raees Khan	NSR	15	BS				02/02/1993	03/10/2014	10/01/2019	10/01/2019		738854	17201-5069463-3	0335-5335013
132	GMS Sheikhi	Osama Salahuddin	Salahuddin Ahmad	NSR	15	BS		Bed	Phy	20/11/1994	04/01/2019	11/01/2019	11/01/2019		907102	17201-3599942	0346-5651252
133	GHS Afrido Killi	Salman Malik	Malik Taj	NSR	15	BBA				01/06/1991	06/09/2019	07/09/2019	07/09/2019				
134	GHS Aza Khel Bala	Shams ul Arifeen	Muhammad Umar	NSR	15	MA			Isl	01/08/1982	25/04/2016	06/05/2016		30/04/1900	725482	17201-3599942	0346-5651252
135	GHS LC Amangarh	Muhammad Ilyas	Wali Ur Rehman	NSR	15	MBA		Finance		10/03/1984	13/05/2017			NTS	866908	17201-85115	0313-6236069
136	GHSS Spin Khak	Muhammad Sajjad Khan	Nauroz Khan	NSR	15	MS			Fin	14/05/1988	04/01/2019	08/01/2019		21/05/1900	905224	17201-6015635-5	0311-9644192

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) NOWSHERA

FINAL SENIORITY LIST PHYSICAL EDUCATION TEACHERS IN DISTRICT NOWSHERA

1	2	3	4	5	6	7	8	9	10	11	12	13	14	16	17	18	19
S.No.	Name of School	Teacher Name	Father's Name	Domicile	BPS	Academic Qualif.	B.A with Division	Prof. Qual:	M.A with Subject	Date of Birth	Date of 1st Apptt: in Edu: Deptt:	Date of taking over charge against the present Post / Distt:	Date of regular Apptt: against the Post	Date of Preomotion as SPET	P.No	CNIC NO	Cell
137	GHSS Nizam Pur	Rehman Ullah	Tawas Gul	NSR	15	MSC		Hed	Elec	06/07/1988	04/01/2019	08/01-2019			908550	17201-6907740-1	0303-8740850
138	GMS Afrido Garhai	Muhammad Ilyas	Rustam Ali	NSR	15	BSC	M/P			14/10/1992	04/01/2019	08/01/2019			908668	17201-74667418-5	0314-5201058

[Signature] 03/08/2020
 District Education Officer (M)
 Nowshera

[Signature]
ATTESTED

The Director Elementary & Secondary Education
Peshawar Khyber Pakhtunkhwa

Subject : Seniority Correction

Respected Sir,

Adverting the following a few lines hoping that a fair contemplation will be given to my humble request. The seniority of SPET's was arranged in 2013 and I was affected. I appealed to honourable Director Edu ; for the correction. In the result of my appeal the seniority list was updated and I was placed in the position 13-A, so the honourable DEO(M) should follows the orders of the higher authority to correct my seniority. The seniority list made by the Director Edu; no one was affected and no appeal by someone was made in this regard.

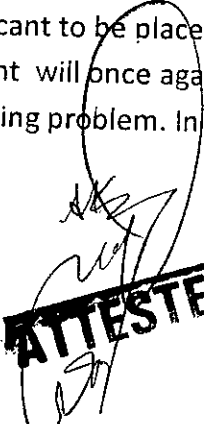
In the light of the above statement, the Director Edu; E & S has the authority to arrange the seniority list from BPS-16 and above. In the respect of exercise of powers of Director Edu ; E & S , the DEO (M) Nowshera has misused the authority which is illegal. More over the seniority list made by honourable Director Edu ; can't be changed or to make amendments by DEO(M) NSR according to rule.

I have been placed in different positions in various seniority lists time to time by DEO(M) NSR which is illegal. But I was placed in 13-A position by the Director Edu; which is legal. At last the special secretary directed the DEO(M) NSR to make the due correction and justification as the teacher has right since 2013.

Sir, the case was sent to the court as the due correction was refused. But during the proceeding honourable Deputy DEO(M) NSR advised me to withdraw the case from the court so that the department can consider your case favorably but sorry to say that after withdrawn the case no attention was being given to my appeal .

Sir, the applicant has requested the DEO(M) NSR for the correction of seniority list following diary Nos. 1. Dairy No. 950 dated 02-01-2020 2. Dairy No. 4528 dated 02-10-2020 . But sorry to say no favourable response has given to the applicant request.

Sir, As a token of last resort , we are hereby once again requesting your good self to please look into the matter once again by providing opportunities to the applicant to be placed on the exact position of the seniority list at number 13-A otherwise the applicant will once again knock at the door of the court of the law for the redressal of this long standing problem. In this case you shall bear the cost of litigation etc.


ATTESTED

Thanking in anticipation Sir,

Yours obediently,

Mr.Fazal Mehmood

GHS Samandar Garhi

Nowshera KPK

Copy to the special secretary of Elementary & Secondary Edu ; KP Peshawar

Distict Education Officer (M) Nowsera KPK.

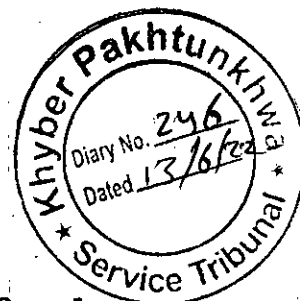
DIARY # 983
Phy Branch
20/10/2020

[Handwritten signature]
ATTESTED

BEFORE THE KHYBER PAKHTUNKHAWA SERVICE

TRIBUNAL PESHAWAR

Service Appeal NO. 3239/2021



Fazal Mahmood VS Secretary E&SE, KPK & others

Put up to the court with relevant appeal.

Next date: 07/07/2022

Reader
30/6/2022
Subject; Request for restoration the right of submitting reply

Respectfully sheweth,

Applicant humbly submits as under,

- 1) That the above mentioned case is fixed for arguments on
07/07/2022
- 2) That due to ongoing enquiry to ascertain the true seniority position of the appellant and prepare reply accordingly respondent did not submit their reply on previous date that is
04/04/2022
- 3) That this Hon'ble Tribunal struck off the respondent's right for submission of reply. (copy of order sheet annexed)

It is therefore humbly prayed that the respondent right to reply may kindly be restored and there reply may be allowed for submission.

Applicant;

District Education Officer (M)

Nowshera

TRIBUNAL PESHAWAR

Service Appeal NO. 3239/2021



Fazal Mahmood VS Secretary E&SE, KPK & others

Next date: 07/07/2022

Subject: Request for restoration the right of submitting

reply

Respectfully shown,

Applicant humbly submits as under.

1) That the above mentioned case is fixed for arguments on

07/07/2022

2) That due to ongoing enquiry to ascertain the true scenario

position of the appellant and prepare reply accordingly

respondent did not submit their reply on previous date that is

04/01/2022

3) That this Hon'ble Tribunal struck off the respondent's right

for submission of reply. (copy of order sheet annexed)

It is therefore humbly prayed that the respondent right to

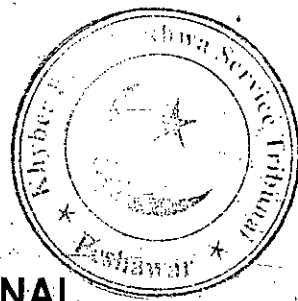
reply may kindly be restored and there reply may be allowed

for admission.

Applicant.

District Education Officer (M)

Nowshera



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 3239 /2021

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 2804

Dated 17/2/2021

Fazal Mahmood
Son of Sultan Mahmood
SPET GHS Samandar Garhi,
District Nowshera.....**Appellant**

V E R S U S

1. The Secretary
Elementary & Secondary Education,
Khyber Pakhtunkhwa,
Civil Secretariat, Peshawar

2. The Director
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar

Filed to-day 17/2/2021

[Signature]
Registrar

3. The District Education Officer
(D.E.O)
District Nowshera.....**Respondents**

Re-submitted to -day
and filed.

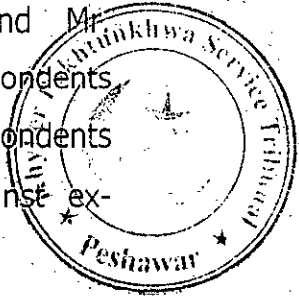
[Signature]
Registrar
01/03/2021

Certified to be true copy

[Signature]
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

21.12.2021

Clerk of counsel for the appellant and Mr. Muhammad Adeel Butt, Addl. AG for official respondents present. None present on behalf of private respondents despite proper service, hence proceeded against ex-parte.



Respondents have not submitted written reply/comments. Learned AAG seeks time to contact the respondents and facilitate the reply/comments on next date. Last opportunity is granted to the respondents to submit written reply/comments on or before next date with the warning that in case they fail to submit the written reply/comments, their right for reply/comments shall be deemed as struck off by virtue of this order. Case to come up for arguments on 04.04.2022 before the D.B.

04.04.2022

Counsel for the appellant present ^{Chairman} Mr. Kabirullah Khattak, Addl. AG for the respondents present.

On previous date, the respondents were given last opportunity to submit written reply/comments on or before the date fixed, failing which their right for reply/comments should be deemed as struck off. The respondents failed to comply with the court order, therefore, their right to submit reply/comments has been struck off by virtue of that order. Learned counsel for the appellant seeks time to argue the case. Last opportunity is granted. To come up for arguments on 07.07.2022 before the D.B.

Date of Presentation of Application 04/04/22 (Mian Muhammad) Member(E)

Chairman

Number of Copies 10/5
Number of Copies 10/5

Certified to be true copy

Khyber Pakhtunkhwa Service Tribunal Peshawar

Date of Delivery of Copy 10/5/22
Date of Delivery of Copy 10/5/22

BEFORE THE KHYBER PAKHTUNKHAWA SERVICE

TRIBUNAL PESHAWAR

Service Appeal NO. 3239/2021

Fazal Mahmood

VS

Secretary E&SE, KPK & others

INDEX

S.No	Documents	Annexure	Page No
1.	Para wise Comments	_____	01-04
2.	Affidavit	_____	05
3	Copy of PET appointment order (Fixed pay - un-trained)	'A'	06-07
4	Copy of CT appointment order	'B'	08
5	Copy of CT Termination order	'C'	09-10
6	Copy of PET re-instatment order (Un-trained)	'D'	11
7	Copy of regularization/graded pay dated 25-04-2000	'E'	12
7	Copy of seniority guidelines	'F'	13
8	Copy of enquiry report	'G'	14-16
9	Copy of service appeal no.205/2018	'H'	17-19

M
Deponent
Masood Khan, ADEO(A), Peshawar
0311-9533533

BEFORE THE KHYBER PAKHTUNKHAWA SERVICE

TRIBUNAL PESHAWAR.

Service Appeal NO. 3239/2021

Fazal Mahmood

VS

Secretary E&SE, KPK & others

Para wise Comments On Behalf Of Respondents no. 01-03

Respectfully Sheweth:

Respondents humbly submit as under.

Preliminary objections:

- 1) The appellant is concealing material facts from this Hon'ble Tribunal as he was appointed untrained on fixed pay.
- 2) The present appeal is badly time barred.
- 3) That the appellant has no cause of action/locus standi to file the instant appeal.
- 4) That the appellant is estopped by his own conduct to file the instant appeal.
- 5) That the instant appeal is not maintainable in its present form.
- 6) That the present appeal is bad for non-joinder and miss-joinder of necessary and proper parties.
- 7) That this Hon'ble Tribunal lacks jurisdiction to adjudicate upon the matter.

REPLY ON FACTS:-

1) Para -01 is incorrect with the explanation that appellant was initially appointed as untrained PET teacher on fixed pay on dated 20-10-1993 than he was appointed as CT teacher on dated 1-11-1995 he joined that by discontinuing his PET service. Later on he was terminated from his CT post on 09-01-1998 the department however showed leniency by re-instating him in his previous service as PET from the date of termination i.e.09-01-1998. It is worth to mention here that the appellant was still untrained on fixed pay he got regularized on dated 25-04-2000 upon completion of his professional training from the department and as the seniority is calculated from the date of regular appointment so he is placed accordingly. (copies of appointment orders of PET & CT, Termination order, re-instatement, regularization and seniority guidelines are annexed as annexure A,B,C,D,E&F respectively)

2) Para -02 is incorrect, no junior PET is placed senior than the appellant and as seniority compilation and maintenance of PET/SPET is the competency of district education officer in this regard to find out the true and actual position of the appellant in seniority list an enquiry was also initiated in whose findings the appellant has been

placed at his right position according to his regularization in the PET/SPET seniority list.

(copy of enquiry report is annexed as annexure G)

3) Para no.03 is correct.

4) Para no.04 is incorrect hence denied no junior PET has been placed senior than appellant in the seniority list. Similarly no such false assurances has been given to the appellant regarding his seniority position similarly the service appeal no 205/2018 as withdrawn by the appellant on his own will was mainly filed for graded pay.

(copy of service appeal no.205/2018 is attached as annexure H)

5) Para 05 is incorrect as explained above.

6) Para 06 is incorrect as no departmental appeal has been filed by the appellant on dated 20-10-2020 the appellant approached directly to this Hon'ble Tribunal.

7) Needs no comment.

REPLY ON GROUNDS:

A. Ground -A is incorrect hence denied no junior PET has been placed senior than appellant in either seniority list. Appellant along with his other colleagues was promoted to SPET according to his present seniority. So the act of the respondents is just according to law and rules.

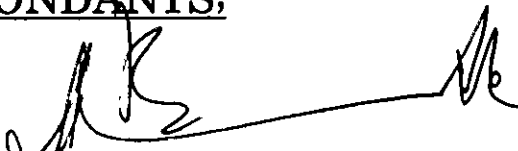
B. Ground -B is incorrect, the respondent no.3/DEO has duly performed his duty impartially according to rules. As the PET/SPET seniority list updating and maintenance is the competency of respondent no.3/DEO so no junior has been placed senior than appellant. Private Respondents no 4-19 as objected by the appellant are senior than him as they are regularized earlier than him.

C. Ground -C is incorrect, as respondent no.03 has duly followed the law and rules.

D. Respondents may also be permitted to raise other grounds during the arguments.

It is therefore most humbly prayed that the instant appeal being erroneous, meritless and vexatious may kindly be dismissed.

RESPONDANTS;


1. The Secretary E & SE, KPK


2. The Director E&SE, KPK


3. The DEO (M), Nowshera

BEFORE THE KHYBER PAKHTUNKHAWA

SERVICETRIBUNAL PESHAWAR

Service Appeal NO. 3239/2021

Fazal Mahmood VS Secretary E&SE,KPK & others

AFFIDAVITE

I, Masood Khan Litigation Officer, office of The District Education Officer (M) Nowshera, do solemnly affirm and declare on oath that the contents of Par wise comments on behalf of respondents are true and correct to the best of my knowledge and nothing has been concealed from this Honourable Tribunal.


Deponent



OFFICE OF THE PRINCIPAL DIRECTOR OF EDUCATION (S) PESHAWAR DIVISION PESHAWAR

APPOINTMENT

Consequent upon the recommendation of Selection Committee, the following candidates are hereby appointed against PET Post in the School, mentioned against each in BPS-9 @Rs. 1175-72-2265 fixed plus usual allowance as admissible under the rules with effect from the date of ^{their} taking over charge in the interest of Public Service.

S.No.	Name & Father Name with Address.	School where Posted.	Remarks.
1.	Mohammad Shahid s/o Haji Fazli Karim Nowshera Cantt.	G.M.S. Risalpur MBR	Against Vacant Post.
2.	Sayar Mohammad s/o Ghulam Mohammad V. Tangi Chd.	G.M.S. Mahmood Abad Umarzai Charsadda.	Against Newly created Post.
3.	Fazal Nawaz s/o Abdullah V.P.O D.I. Khel MBR	G.M.S. Maroba MBR	Against Vacant Post.
4.	Waliullah s/o Faridullah V. S.P.O Charsadda.	G.M.S. Jehangir Road MBR	-do-
5.	Alam Zeb s/o Abdul Majid Chamkani Peshawar.	G.M.S. Jongari Nowshera.	-do-
6.	Arshad Naz s/o Mushtaq Hussain Teh. & Di. Chd.	G.M.S. Mirzagan Charsadda.	Newly created Post.
7.	Inamullah Jan s/o Bahadar Khan V. Sarwani Chd.	G.M.S. Spin Kana Nowshera.	-do-
8.	Mian Arshid Hayat s/o Mian Inwamid Din V. Z.K.K. Shahib MBR	G.M.S. Sawai MBR	-do-
9.	Mohammad Karoog s/o Mohd. Umar Khan V. Abbas Killa Chd.	G.M.S. Malik Aman Koorana MBR	-do-
10.	Muhammad Ali s/o Abdus Kheski MBR	G.M.S. Khat Killa Nowshera.	-do-
11.	Saifur Rehman s/o Ziaurat Gul V. Qudim Killa Chd.	G.M.S. Khatkha Chd.	Employed as Afghan in P.P.S. replaced by Govt. -do-
12.	Abdul Ghafoor s/o Mohd. Abdul Ghafoor s/o Mohd. Zaffar Mohi-ud-Din Khat Killa Charsadda.	G.M.S. Gul Khatkha Koorana Umarzai Chd.	-do-
13.	Umar Hayat s/o ITC G.S. No. 2 Akbar Pura MBR	G.M.S. Kutar Tan Nowshera.	-do-
14.	Imam Mohammad Fakhir s/o Fazli Rahim V. Kankal Peshawar.	G.M.S. Kandar MBR	-do-
15.	Fazal Mohammed s/o Sultan Mohammad Samundar Garhi	G.M.S. Mamraz MBR	-do-
16.	Tehmidullah s/o Saddatullah V. S.P.O R Rajgar Charsadda.	G.M.S. Garhi Chaudan MBR Chd.	-do-

PET appt.

ATTESTED

First Appointment ord. P.E.T. G.M.S. Charki Mamraz MBR
 Dated 20.10.1993. Fazal Mohammad s/o Sultan Mohammad
 G.H.S. Killa S.S.L.K

(7)

A-

(7)

Endst. No. 8163 / F. No. CT/DM/PET/AT/ Dated Pesh: the 20.10.93.
Apptt: 193/

Copy of the above is forwarded to the:-

1. Director of Secondary Education NWFP Peshawar.
2. Director of Primary Edu: Hayat Abad NWFP.
3. PS to Secretary Education Govt: of NWFP.
4. PA to Director of Secondary Edu: NWFP Peshawar.
5. Accountant General NWFP.
6. All the Distt: Edu: Officers (Male) Secondary Peshawar/Nowshera/Charsadda.
7. Principals/Headmasters concerned.
8. ANEO Establishment Branch, JODP Office.
9. Subst: Establishment Branch, JODP Office.
10. Candidates concerned.
11. P/File concerned.
12. Distt: Accounts Officers, Charsadda and Nowshera.

Handwritten signature

Deputy Divisional Director (S) /
For / Divisional Director of Edu: (Schools)
Peshawar Division, Peshawar.

Office of the DDO (M) Serang Nur

Form No 16-18 Date 25/10/1993

copy to the

- 1) DHO, Nowshera
- 2) H/Master JMS Charsadda
- 3) Office concerned

Abdul Jabbar/
Steno Typist

ATTESSED

Handwritten signature

Handwritten signature
DDO (M) Serang Nur
25/10/93

GOVERNMENT OF PESHAWAR
DIRECTOR OF PUBLIC RELATIONS
PESHAWAR

Appointment of the following person(s) is hereby ordered against the post of CT on temporary & adhoc basis at Rs. 1605/- fixed plus usual allowances as admissible under the rules in PCS -9 (No. 1605-97-3060) at the Institution named

(CT appt.)

Name, Qualification & Address	Posted at	Remarks
Fazal Mahmood S/O Sultan Mahmood PST CMS Kotar Pan	GHSS Mizam Pure Nowshera.	Against Vacant CT Po

TERMS & CONDITIONS/

1. His/Her appointment is purely temporary & liable to termination any time without assigning reasons or notice.
2. In case of resignation he/she will be liable to pay 3 months' pay in lieu of notice.
3. He/She is required to produce health & age certificate from the medical authority concerned before taking over charge provided he/she is not in Govt. service.
4. He/She should not be allowed to take over charge if his/her age is less than 18 years or above 25 years.
5. His/Her appt. is subject to further condition that he/she is domiciled of NWFP.
6. His/Her antecedents forms should be obtained duly verified by the local police authorities & submit to this office together with application for appt. on prescribed form & under taking declaration of moveable & immovable property for record in this office.
7. All original educational character & domicile certificates should be thoroughly checked before handing over charge, if necessary it should be verified from the Institutions concerned.
8. If he/she fails to take over charge of the post within a week of the receipt of this order the offer of appt. shall stand cancelled.
9. Charge reports should be submitted to all concerned.
10. TA/DA etc is allowed.
11. He/she should be given test in Waziristan & Pakistan History. Result intimated to this office.

(MOHAMMAD SAIED)
DIRECTOR OF PUBLIC RELATIONS

DIV. DIRECTOR OF PUBLIC RELATIONS
PESHAWAR DIV. PESHAWAR
1-11-1995

9960-68

/Dated

To the Secy, Nowshera.
Nowshera/Nowshera.

Principal GHSS Mizampur Nowshera.

ATTESTED

[Signature]

for Div. Director of Public Relations
Public Relations Division

Attested
[Signature]
G. H. S.
K.M. N.S. Khan

D.D.S. Peshawar - C.T. Appointment order copy.

N.B. - Line to be drawn under the qualification possessed.

No. 1035

OFFICE OF THE DIVISIONAL DIRECTOR OF EDUCATION (S) PESHAWAR DIVISION PESHAWAR.

APPOINTMENT.

CT
Termination

Consequent upon their selection by the Departmental Selection Committee, the Divl: Director of Education (S) Peshawar has been pleased to appoint the following trained CT (Male) at the School noted against their names in BPS. (9) at Rs. 1605-17-3 plus usual allowances as admissible under the rules with immediate effect subject to the following existing terms and conditions.

S.No.	Name & Address.	D/O Birth.	No. in Int./M.List.	Score.	School.	Remarks.
1.	Mamil Shah S/O Lawang- Shah, Vill: Aza Khel, Payan (NSR).	5.12.68	103/1	96	GHS, Adamzai NSR.	Vacant Post.
2.	Mayaz Khan S/O Ahyaud- Lin. H. No. 3066, Moh: Kuwate- Islam Dargari Gate Pesh.	12.9.71	384/2	96	GHS, Wazir Bagh No. I Peshawar.	-do-
3.	Inayatpur Rehman S/O Melboobur Rehman PTC GPS No. I Khesghi Payan, (NSR).	12.2.68	90/3	91	GMS, Ismail Abad- Mirza Masri Banda NSR.	-do-
4.	Masood S/O Mahfooz Gul, GPS Kotla Mohair- Khar, Peshawar.	1.1.71	235/4	91	GHS, Landi Arbad, Peshawar.	-do-
5.	Jamas Khan S/O Lal-Rahim, Vill: Khujay, P/O Shabq- adar (Chd:)	2.2.71	148/5	90	GMS, Daulatpura, Chd:	-do-
6.	Midrarullah S/O Hamidu- Allah, TFC GPS, Maghul Khel, (Chd:),	1.4.72	235/6	91	GMS, Utmanzai, Chd.	-do-
7.	Noorul Amin S/O Abdul- Wadood, Vill: Amir Abad, Amir Abad, Charsadda.	15.9.75	203/7	91	GMS, Garhi S. Khan, Peshawar.	-do-
8.	Jangraiz Khan S/O Misal- Khar, PTC GPS Ghalgi Kandar Khel, Peshawar.	16.12.70	408/8	90	GMS, Khudnada Pesh.	-do-
9.	Inayatpur Rehman S/O Said Rehman, PTC, GPS, Langi Nosratzai, Chd:	18.4.71	13/9	90	GHS, Katuzai, Chd.	-do-
10.	Abdul Qayyum S/O Wali- Shahmad, PTC, GPS, Surizai Payan Pesh.	1.1.72	238/10	90	GMS, Urmar Bala, Peshawar.	-do-
11.	Mohammad Arshad S/O Mohammad Safdar, Naushin Qadeem, Talab Road H. No. 778 Peshawar.	5.12.72	184/11	90	GHS, Adezai, Pesh:	-do-
12.	Azizul Haq S/O Arsalan Khan, Vill: Shabqadar, Chd.	4.12.70	298/12	89	GHS, Aza Khel Bala, (NSR).	-do-
13.	Arshad Ali S/O Saeed- Mohammad, PTC, GMPS, Sardar Colony, Peshawar.	2.4.71	375/13	89	GHS, Adezai Pesh.	-do-
14.	Saeed Khan S/O Jalal- Khan, PTC GPS Rehmatullah- Khan, Shabqadar (Chd:)	23.5.72	473/14	89	GMS, Amangarh (NSR)	-do-

83	Mashid S/O Abdur Rashid, 8.8.70 No. 20/A Civil Quarter Pesh. PTC GMS, Swati Gate, Pesh:	203/81	82	GMS, Kharkori Pesh:	Vacant
	Saif Khan S/O Lakhkar Khan, 31-3-71 Vill: Palosi Atuzai, Pesh:	405/82	82	GMS, Badizai, Pesh:	-do-
84	Fazle Mebood S/O Fazle Wahid, Vill: Mandani Chd:	10.4.71	228/83	GMS, Nawan Killi, NSR- Kalan.	Vice Fazle- Mebood CT terminated Vacant.
85	Sanaiz Ali, Shah S/O Muhammad- Zobair, Behloola Payan Chd:	19.7.72	227/84	GMS, Issa Khel, Pesh.	
	Muhammad Iqbal S/O Haider Khan, PTC GMS, Mira Surizai Payan Pesh:	5.5.61	171/85	GMS, Kharkori Pesh:	-do-
	Muhammad Iqbal Hussain S/O Hussainzada, PTC, GMS, No. I Harichand (Charsadda).	2.5.62	451/86	GMS, Passani Pesh:	-do-
	Faridullah Shah S/O Muhammad- Anwar, PTC, GMS, Sheikh Muhammadi No. I Peshawar.	20.6.62	254/87	GMS, Nawan Killi NSR Kalan.	Vice M. Nasir CT terminated
	Mohammad Sajid S/O Muhammad- Umar, PTC, GMS Notla, Pesh: H.No. 1433 Loh: Fazle Haq, Illaqa Yakkatoot Peshawar.	30.4.65	172/88	GMS, Z.K.K. Sahib, NSR.	Vice Muhammad Zahir Khan being terminated
	Ibrahim Shah S/O Alam Shah, PTC GMS, Ghumbek No. I, Chd:	1.1.66	281/89	GMS, Bakarai- Kariza Peshawar.	Vice Mukhtar Ahmad CT terminated.
	Khalid Ahmad, CT GMS, Z.K.K. Sahib NSR.			GMS, Spin Kana, NSR.	Against
	Muhammad Tariq Shah, C.T. GMS, Nizampur NSR.			GMS, Z.K.K. Sahib, NSR.	Vice S. No. 92
	Muhammad Shah, C.T. GMS, Peshawar Cantt:			GMS, Umar Payan, Peshawar.	Vice S. No. 92 CT procedure on file
	Muhammad Khan S/ CT GMS, Sherkor: Peshawar.			GMS, Nodah Payan, Peshawar.	Vice Hayatullah Khan transfer- red to Mandani
	Muhammad Ahmad, CT GMS, Landi Akhron Ahmad, Peshawar.			GMS, Pesh: Cantt:	Vice S. No. 92
	Muhammad Awan, C.T. GMS, Gani Mandan Peshawar.			GMS, Gani Mandan, Peshawar.	Vice S. No. 88
	Mukhtar Shah C.T. GMS, Issa Khel Bala, NSR.			GMS, Nizampur, NSR.	He should be kept under report for one year.
	Amanullah %/o P.T.C. GMS, No. 2 Umar Miana, Pesh:	13.4.68	59	GMS, Saivi NSR.	(From the disable post)
	Younis C.T. GMS, Rahi, Nowshera.			GMS, Dag Imail Khel NSR.	Vacant post
	Fazli Subhan GMS, Ganj Mandi Peshawar.			GMS, Pahari Duya Peshawar.	Vacant post

TERMS & CONDITIONS

They will be governed by such rules & regulations as may be prescribed by the Govt. from time to time for the category of the Govt. servants to which they belong.

Their services will be liable to termination on one month's notice from either side. In case of resignation without notice one month pay will be forfeited in lieu thereof.

Termination order
C.T. Post

Annexure-D

11

Arrear Sanction order

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) SECY: NOWSHERA

OFFICE ORDER/

PET
Re-instated
order

Consequent upon the acceptance of appeal referred by Incharge Officer Public response Centre Nowshera and in continuation to this office Memo No.6198-6202 Dated 24.12.98, Mr. Fazal Mahmood PET Govt: High School, Badrashi Nowshera is hereby re-instated from the date of termination with all back benefits.

- NOTE:-
1. Necessary entries should be made in his S/Book.
 2. Charge report should be submitted to all concerned.

(MOHAMMAD SALEEM)
DISTRICT EDUCATION OFFICER
(MALE) SECONDARY, NOWSHERA.

Endst:No. 172-74 /Dated-Nsr; the 4/3 /2000.

Copy forwarded for information & W/action to the:-

1. Incharge Officer Public response Centre Nowshera & his letter No.84/DON/PRC Dt:27.11.99
2. District Accounts Officer Nowshera.
3. Principal Govt:High School Badrashi Nowshera.

(MOHAMMAD SALEEM)
DISTRICT EDUCATION OFFICER
(MALE) SECONDARY, NOWSHERA.

RECEIVED

N.B. - Line to be drawn under the qualification possessed.

13 Unsuccessful P.E.T. result 2/4/2000

9	10	11	12	13	14	15
Signature and name of the head of the office or other attesting officer in case of promotion, transfer, etc.	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting Officer	Nature and duration of leave taken	Signature of the head of the office or other attesting officer	Reference to recorded punishment or censure or order of raise of pay
<p><i>[Signature]</i> District Officer (M) Secy. (Admin. & Dev.) Nowshera</p>	<p>30/11/2002</p>	<p>Death of the Officer</p>	<p><i>[Signature]</i> Dist. Officer (M) Secy. (Admin. & Dev.) Nowshera</p>	<p>Leave: Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government. Government to which debitable.</p>	<p><i>[Signature]</i> Principal Govt. High School Badrahi (Roz)</p>	<p>Reference to recorded punishment or censure or order of raise of pay</p>
<p><i>[Handwritten notes in column 9-12]</i> No. 1563/54 dt 7/7/01 Pay & all advances on a/c of following BPS 14 vide D.O. (10) NSA No. 526 dt 6/11/01 @ 2005/11/01 D.T. R. Khan Appointed against ex post at G.H.S. Nizampur vide District Director of Education Peshawa Dist. Order No. 9962-68 dt 1-11-95</p>				<p>Services Verified w.o.P. & Other Record of this officer raised P.E.T. Exam 1995 from R.D.E. District Dera Ismail Khan</p>	<p>01-01-2000</p>	<p>608/1050 and Passed First Division</p>
<p><i>[Signature]</i> District Officer (M) Secy. (Admin. & Dev.) Nowshera</p>	<p>30/11/2003</p>	<p>A/Movs</p>	<p><i>[Signature]</i> D.E.O.M.</p>	<p>Allowed Graded Pay in BPS No. 14 due to possessing higher qualification B.A.M. and D.W. with Professional qualification of P.E.T. We from 25.4.2000 from the date of passing of Professional Exam vide this office No. 5126 dt 4/6/2000</p>	<p><i>[Signature]</i> District Education Officer (Male) Secondary Nowshera</p>	<p>Result declared on 25/4/2000</p>

Annexure-F

13

Directorate of Elementary & Secondary
Education Khyber Pakhtunkhwa, Peshawar.

No. 22916 /A-88/KC/SET(M&F)SL/Inform:

Dated Pesh: the 31 / 8 / 2012

To

The Executive Distt: Officer
Elementary & Secondary Education Peshawar

seniority
guidelines

**SUBJECT: - Guidance for the preparation of seniority lists/promotion/upgradation
of various cadres of teaching staff in Distt: Peshawar.**

I am directed to refer to your letter No. 11005 dated 23-8-2012 on the subject
noted above and to inform you as under:-

1. The seniority cannot be considered from the date of appointment as untrained teacher. The seniority is considered from the date of regular appointment post or from the date of passing the prescribed professional qualification in case of untrained appointment (copy of the Rules attached).
2. The name of the teacher transferred from one district cadre post to other Distt: cadre post on his own request will be placed at the bottom of the seniority list i.e according to the date of taking over charge after the date of issue of his inter Distt: transfer order.
3. The name of the untrained teacher cannot be enlisted in the seniority list unless he passes the prescribed professional qualification.
4. The seniority of the teacher who was transferred to his own District due to devolution of Divisional Directorate will not be disturbed.
5. The new upgraded posts i.e BPS-14, BPS-15 & BPS-16 will be filled by promotion etc as & when the new Service Rules are notified by the Govt: of Khyber Pakhtunkhwa. The notification for constitution of DPC will be issued soon after the new Service Rules.
6. The ACRs/PERs are not required in fixation of pay due to upgradation of scales of PST/Qari teachers (M&F) in BPS-12 as well as upgradation of scale of CT/DM/PET/AT/TA teachers (M & F) in BPS-15. The ACRs will be required for their promotion in next scale against the newly upgraded posts in BPS-14, BPS-15 & BPS-16.
7. The new service rules/ amendment are under process.
8. Before the Service Recruitment Rules 2011, the teachers having FA & F.Sc (in 3rd division) already appointed according to the prescribed rules at that time, will be considered for seniority, but their promotion against the newly upgraded posts will be considered if allow the new Service Recruitment Rules which is under process.

Endst: No. 22917-2322

Copy forwarded for information & necessary action to the:-

1. All the Executive Distt: Officer, (E&SE) in Khyber Pakhtunkhwa.
2. PS to the Secretary to Govt: E&SE Department Khyber Pakhtunkhwa.
3. PA to the Director E&SE Khyber Pakhtunkhwa

Deputy Director (Establishment)
(E&S) Khyber Pakhtunkhwa Peshawar

Deputy Director (Establishment)
(E&S) Khyber Pakhtunkhwa Peshawar

Inquiry Report in the light of complaint by Mr. Fazal Mehmood SPET GHS Samandar Ghari Nowshera against Education Department through PMDU PCP No. KP270921-89125285 (AB) dated: 27/09/2021.

Preamble:

Consequent upon Order of the District Education Officer (M) Nowshera No. 5112-16 DEO (M)/ Esttb: Branch/NSR/ Enquiry Dated: 22/10/2021, regarding the cited subject, we the inquiry committee conducted the enquiry in various sessions and directed the complainant for the provision of relevant documents (Annex-A).

Introduction:

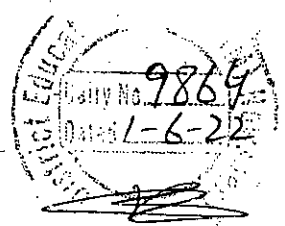
- 1- Mr. Fazal Mehmood has been performing his services in E&SE Department since, October 20th, 1993 (Annex-B) and presently as SPET at GHS Samandar Ghari Nowshera.
- 2- He has changed his post in 1995, applied for lien and join CT post till 1998 (Annex-C). His lien did not accept.
- 3- His services were terminated by the then Divl: Director Peshawar Division Peshawar vide Endstt No.687-891 dated 09-01-1998 (Annex-D).
- 4- He was Re-Instated by the DEO (M) Nowshera against PET Post (Untrained) vide DEO (M) Nowshera order Endstt No.6198-6202 dated 24-12-1998 (Annex-E). It is worth mentioned to state that the appellate authority was the then Director Education NWFP in the instant case. The DEO (M) Nowshera was not the appellate/ Competent authority for his re-Instatement. However, due to unknown reason, the DEO (M) Nowshera issued his Re-Instatement order in violation of Policy in vogue.
- 5- He has passed SDPE Examination from Gomal University D.I.Khan in the session 2005-06, result declared on 04-09-2006.
- 6- He was promoted to the post of SPET on 27/08/2013 at serial No. 09, vide order No. 4119-25/ file No. 1/ Promotion Senior PET B-16: Dated Peshawar the: 27/08/2013 in the light of his appeal to the Directorate of Elementary S& Secondary Education for correction in seniority which was accepted and placed on 13-th A position in seniority.

Proceedings

In compliance to the captioned order, we the inquiry committee, started the proceedings to search reality about the cited complaint accordingly. We summoned the complainant several times for personal hearing/ discussed the matter with him in detail and concluded the following findings

Handwritten notes:
AOED/Secy
Fazal Mehmood
+ Messaged list
11/6/22

Signature
31/05/22

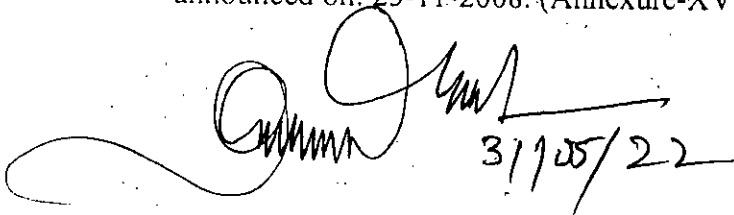


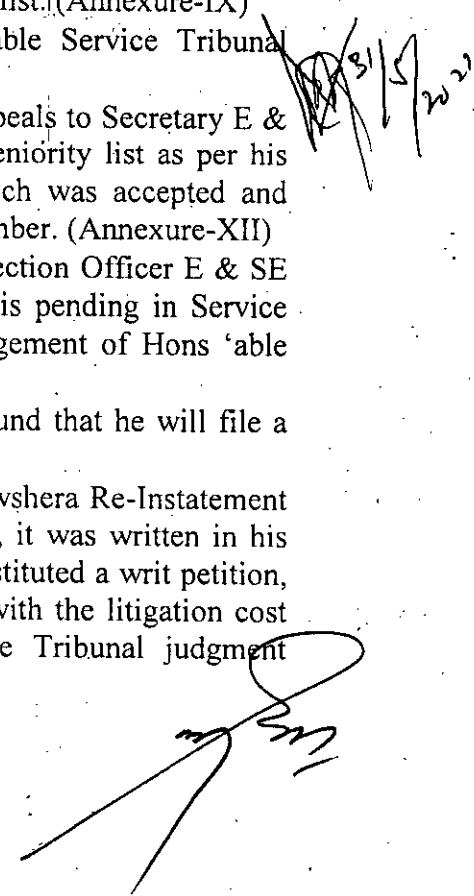
Signature

Handwritten notes:
31/5/22

Findings:

- 1- Mr. Fazal Mehmood SPET is the permanent employ of education department performing his duty at GHS Smandar Ghari since August 27th, 2013 till date. (Annexure-I).
- 2- In 1995 he was appointed against the post of CT on temporary/ adhoc basis at GHSS Nizam Pur Vide Order No. 9962-68/ Dated: 01/11/1995. (Annexure-III).
- 3- After joining CT he has applied for Lien but not granted. (Annexure-IV).
- 4- His service as CT was terminated on January 1st, 1998. (Annexure-V)
- 5- He was re-instated against PET Post by DEO (M) Nowshera on December 24th December, 1998 vide order No. 6198-5202. (Annexure-VI).
- 6- At the time of his first appointment as PET in 1993 and even at the time of his re-instatement in 1998 he was untrained.
- 7- He has completed PET short Course on 25-04-2000, from RDE Peshawar. Entry has made in service book. (Annexure-VII).
- 8- The length of service of an untrained servant is not counted for seniority. The length of trained period is entitled for seniority only.
- 9- As his lien application was not accepted by the competent authority while he has left the post of PET, joined CT, changed the Cadre therefore he remained absent for a period of 03 years, 01 month and 10 days i.e.: 01-11-1995 to 24-12-1998.
- 10- It may also be elaborated that does there any rules? under which an absent servant for so long period can be re-instated into his initial cadre/post of recruitment?
- 11- In the year 2013 his seniority number was 22 as per the then seniority list. (Annexure-VIII).
- 12- In February 21st, 2013 he submitted an appeal to the Director E& SED KPK for granting of correct position in seniority list and promotion, which was accepted and he was placed on Serial No. 13A, in the promoted PETs list. (Annexure-IX)
- 13- On 14/02/2018 he instituted an Appeal to the Hon' able Service Tribunal Peshawar for correction in seniority list.
- 14- Meanwhile on July 2nd & August 08th, 2018, he moved appeals to Secretary E & SE requesting for correction of seniority number in the seniority list as per his promotion notification No.4119-25 dated 21/02/2013 which was accepted and directed the DEO (M) Nowshera to correct the seniority number. (Annexure-XII)
- 15- The DEOM Nowshera submitted a written statement to Section Officer E & SE KPK with the plea that the case of seniority in question is pending in Service Tribunal and it will be appropriated to wait till final judgement of Hons 'able Service Tribunal. (Annexure-XIII).
- 16- On 21-11-2019 he withdrawn the cited appeal on the ground that he will file a fresh appeal in future if needed. (Annexure-XIV)
- 17- At the time of reinstatement, in the light of DEO (M) Nowshera Re-Instatement order issued vide Endstt No. 6198-6202 dated 24.12.1998, it was written in his order that he will not claim back benefit but latter on he instituted a writ petition, prayed for back benefit which was granted to him along with the litigation cost from the respondents in the light of Hon able Service Tribunal judgment announced on: 25-11-2008. (Annexure-XV).


31/05/22


31/5/22

18-He mis-led the Hon'able service tribunal by providing the fake Re-Instatement order of DEO (M) Nowshera wherein the words of "All back benefits were incorporated while it has been recorded in the original Re-Instatement order, it has been recorded as "WITHOUT BACK BENEFITS". Photo copies of both the orders are attached herewith for ready reference please as Annex-XVI).

19-It was noticed during the course of enquiry that he has already filed an appeal for seniority in Hon'able service tribunal Khyber Pakhtunkhwa bearing appeal No.3239/2021 on dated 17-02-2021 (Annex-XVII).

Recommendations:

In the light of above mentioned facts and documentary proof on record, it is recommended that: -

As the appeal of the complainant is already sub-judice in the Hon'able service tribunal Khyber Pakhtunkhwa bearing appeal No.3239/2021 dated 17-02-2021, It will be appropriate to wait till final judgement of Hons 'able Service Tribunal Khyber Pakhtunkhwa.

1: Muhammad Arif
Chairman Enquiry Committee
Principal, GHS Taru Jabba Nowshera.

2- Dr. Ali Said Mashwani
Member enquiry Committee
Principal, GHS Misri Banda NSR.

3- Muhammad Idrees Hashmi (Member)
Superintendent, DEOM Nowshera.

BEFORE THE HONORABLE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA

Service Appeal No. 205 / 2018

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 204

Dated 14-2-2018

Fazal Mahmood, SPET, Government High School, Samander Garhi, District
Nowshehra

Versus

1. The Government of Khyber Pakhtun Khwa through Secretary E&SL, Peshawar
2. The Director E&S, Directorate E&S, Peshawar
3. The District Education Officer, Nowshehra
4. District Accounts Officer, Nowshehra.

Appeal under section 4 of the Service Tribunal Act, 1974 whereby the Respondents have given no attention to the Representation made to them by the Appellant, for the grant of graded pay and consequential benefits.

Filed to-day

Registrar

14/2/18

On Acceptance of this Appeal, this Honorable Court may please hold the Appellant entitled for the award of graded pay and all the benefits attached to it.

Respectfully Sheweth,

1. That the Appellant was appointed on 20/10/1993, against the Post of PET in BPS-9 by the Respondents department on fixed pay, and since then he is serving the department with zeal and devotion. (Copy of the appointment Order is annexed as Annexure "A").

It is important to mention that during the days of Appellant's appointment, there were available no trained teachers and the Respondent Department had

no other option, hence, the appointment of untrained teachers took place. Due to their appointment thousands of students were able to get education. (copy of the appointment order is attached as Annexure "A").

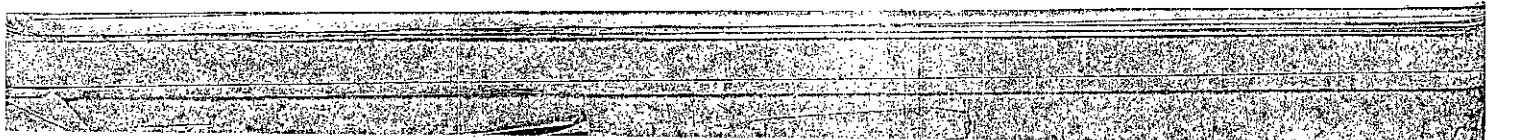
- 2. That on 05/11/95 the appellant was adjusted against CT post as one teacher M.Haroon resigned from the post.
- 3. That the Appellant passed C.T exam on 15/07/1996 and as such the appellant was granted graded pay of C.T Post vide order dated 15/7/96. (Copy of the Order is attached as Annexure "B"). *terminated*
- 4. That on 09/01/1998 the Appellant was terminated from service and filed the departmental appeal, and, then Service Appeal bearing No.463/98. During the pendency of appeal the appellant was re instated in to service by the competent authority on 24/12/98 and resultantly the appellant withdrew his Service appeal. (copy of the reinstatement order is annexure "C")
- 5. That, upon completion of teachers training, after four years of service, the Respondents allowed the graded pay / regularization with effect from 31/03/1999.
25-04-2000 regularization
- 6. That the appellant throughout his service agitated for the grant of graded pay with effect for their induction/appointment in to the service but no attention, to his legitimate demand, was ever given by the respondents, hence the instant appeal .
- 7. That the Appellant filed the Representation before the competent Authority which was not responded within statutory period of 90 days and hence the instant service appeal, despite the fact, the Representation contains the judgments of the higher courts in this respect. (Copy of the Representation is annexed as *and service record annexure D,*
- 8. That the appellant, being aggrieved of the acts and omission by not treating her at par with other similarly placed employee on the same grounds, and having no other adequate and efficacious remedy, assails the same through this appeal inter alia on the following grounds:-

CT graded - Pay not PET

Grounds.

- A. That the appellant has not been treated in accordance with law and has been discriminated among similarly placed persons who were allowed graded pay for the un trained period, but, it was illegally denied to the appellant.
- B. That in the absence of any condition regarding the training and regularization , in the appointment Order , the Respondents have no rights whatsoever to deny the legitimate rights related to regularization , graded pay , seniority , promotion and other allowances, increments, etc. Had that not been the situation the Appellant might have completed his training soon after assuming the charge. It is in fact the reason that the Superiors Courts were pleased to allow the increments from the date of induction in to service to untrained teachers.

It is important to mention that the appellant been related to the Teaching Profession was appointed during the times when the trained teachers were not available and undoubtedly such teachers are the pioneers in developing the

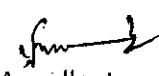


Education structure of the Province. By denying the Appellant's Service legitimate benefits, the respondents are not acknowledging their efforts, roles rather in a way they are disrespecting the Appellant's important role in developing the Education Sector.

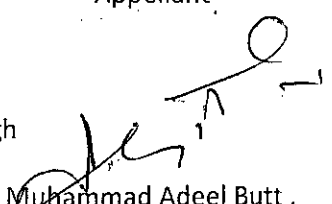
- C. That it is a well settled principle of Law that when a point of Law was decided by the Superior Courts which not only covered the cases of Civil Servants who litigated but also those who have not litigated so the dictates of good governance demands that those judgments should also be implemented in the cases of others employed instead of constraining them to approach the Courts.
- D. That as per judgment of the Honorable Supreme Court of Pakistan, if is made to work on a particular post, then the employee will be entitled to all remuneration attached to that post.
- E. That numerous Judgments of the August Supreme Courts allowed the graded pay/running pay to untrained teachers vide Notification 30-10-2009. The Appellant been a similarly placed person cannot be deprived from the right that has already been granted to other similarly placed Persons.
- F. That Appellant case is similar and identical to those numerous cases in which civil servant had been allowed graded pay from the date of their induction in to service.
- G. That beyond any shadow of doubt the Appellants were serving on the higher grade and no law of the land restricts the Respondent to disallow such benefits to its employees, rather the August Supreme Court of Pakistan and this Service Tribunal itself has allowed numerous appeals on the same ground.
- H. That it is also important to mention that the Respondents have granted graded pay and other related benefits to other untrained teachers from the date of their induction into service, hence the appellant has been discriminated.
- I. That the departmental representation may be read as the integral part of this Appeal.

It is, therefore, most humbly requested that on the acceptance of this Service Appeal this Honorable Tribunal may please hold the Appellant entitled for the graded pay, seniority, promotion with effect from date of his induction/ appointment into the service and the same period in service be also counted towards his service .

Any other remedy, this Honorable Tribunal may deems appropriate may also be granted to the appellant under the circumstances


Appellant

Through


Muhammad Adeel Butt ,

Advocate Peshawar.