

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

Khyber Pakhtunkhwa
Service Tribunal

Service Appeal No: 1559/2023

Diary No. 3793

Dated 2/10/23


Syed Salman Hashmi, SST (B/C) BPS-16, GHS No. 2, Bannu Appellant.

VERSUS

Secretary (E&SED) & others..... Respondents

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

①

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

Service Appeal No: 1559/2023

Syed Salman Hashmi SST (B/C) BPS-16, GHS No. 2 Bannu Appellant.

VERSUS

Secretary (E&SED) & others..... Respondents

JOINT PARAWISE COMMENTS FOR & ON BEHALF OF THE RESPONDENTS No: 1-3

Respectfully Sheweth :-

The Respondents No. 1-3 submit as under: -

Preliminary Objections

1. **That** the appellant has got no cause of action/locus standi. Committee
2. **That** the instant Service Appeal is badly time-barred, & liable to be dismissed.
3. **That** the appellant is not an aggrieved person within the meaning of Section-4 of Khyber Pakhtunkhwa Service Tribunal Act-1974 read with Article 212 of the constitution of Islamic Republic of Pakistan 1973.
4. **That** the appellant has concealed material facts from this Honorable Tribunal in the instant service appeal with regard to his mis-conduct by sharing a statement on social media in violation of the already issued instructions regarding maintaining cleanliness in the school's premises on dated 21-08-2022 of the Respondent No. 1.
5. **That** the instant service appeal is against the relevant provisions of law as the contract-based service of the appellant against the SST post has been terminated vide office order dated 02-11-2022 by the Respondent No. 2.
6. **That** the appellant has filed the instant appeal on mala-fide intentions just to put extra ordinary pressure on the Respondents for the grant of illegal & even unauthorized service benefits of his posting against a MC post, whereas, he is an SST BPS-16 TC in violation of the Rules & policy as well as judgments of this Honorable Tribunal for not posting an officer of MC against a Teaching Cadre post in the Department.
7. **That** the appellant has not come to this Honorable Tribunal with clean hands.
8. **That** the instant appeal is liable to be dismissed for mis joinder & non-joinder of the necessary parties to the present appeal.

- 9. **That** the appellant is estopped by his own conduct to file the instant appeal.
- 10. **That** the instant Service Appeal is not maintainable in its present form.
- 11. **That** the impugned Notifications/order dated 02-11-2022 & 16-02-2023 of the Respondents No. 1 & 2 are legally competent & liable to be maintained in favor of the Respondent in the interest of justice.
- 12. **That** the appellant has been treated as per law, rules & relevant policy in the instant case by the Respondent No. 2.
- 13. **That** the appellant has also executed an affidavit dated 29-11-2022 that he will never use anti-department statements on social media in future.

ON FACTS.

- 1 **That** Para-1 pertains to the contractual service record of the appellant against the SST (B/C) in BPS-16 inducted vide order dated 14-09-2018 through a recruiting agency by the Department.
- 2 **That** Para-2 is incorrect on the grounds that the appellant has been found guilty of rude & mis-conduct attitude during his official duty & has also violated the mandatory instructions of the competent authority for maintaining cleanliness drive on the date fixed for Sunday on 21-08-2022 in the schools.
- 3 **That** Para-3 is correct that a statement of allegation vide letter No. 10955 dated 06-09-2022 as referred above in response to the letter dated 22-09-2022 of the Respondent No. 3 to the Respondent No. 2 to proceed against the appellant under the E&D Rules, 2011 which was resulted in the serving of statement of allegation upon the appellant by the Respondent No. 2 under the Rules & policy in vogue which is reproduced as under:
 - a. **You turned out to be rude & mis-conduct in your official duty.**
 - b. **The Secretary E&SED KP issued instructions to all the head of institutions/all school staff for necessary cleanliness on 21-08-2022/Sunday.**
 - c. **You (the appellant) has shared a statement against the instructions of high ups of the E&SED on the Facebook which is against the Rules & regulations & you have appeared to be guilty of mis-conduct.**
 - d. **You (the appellant) has committed breach of afore said Rules being a government servant within the meaning of Section-15 of KP Civil Servant Act-1973 duly received by the appellant as evident from his reply to the Respondent No. 2 *attached as Annex-A & B.***

- 4 **That** Para-4 is also correct that vide office order dated 02-11-2022, the contract-based job/service as SST of the appellant has been terminated by the Respondent No. 2 in view of the terms & condition of the Notification dated 14-09-2018 **attached as Annex-C.**
- 5 **That** Para-5 is correct that aggrieved from the order dated 02-11-2022 of the Respondent No.2, the appellant has filed a Departmental Appeal before the Respondent No.1 for setting aside the said order which was allowed vide Notification dated 16-02-2023 by reinstating the appellant in-service as SST with imposing minor penalty of withholding of one annual increment for the period of one year along with treating the intervening period (from the date of the withdrawal of the contract of the appointment of the appellant till date of restoration of his contractual appointment as SST) as leave without pay. **attached as Annex-D.**
- 6 **That** Para-6 is correct to the extent of regularization of the service vide order dated 22-06-2023 **attached as Annex-E.**
- 7 **That** Para-7 is incorrect that the appellant is not an aggrieved person within the meaning of Section-4 of Khyber Pakhtunkhwa Service Tribunal Act-1974 read with Article 212 of the constitution of Islamic Republic of Pakistan 1973, hence, the appeal in hand is liable to be rejected on the following grounds inter alia :-

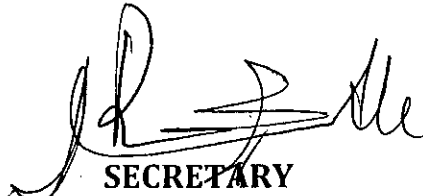
GROUND.

- A. **Incorrect & not admitted.** The impugned Notifications dated 02-11-2022 & 16-02-2023 are within legal sphere & even in accordance with the law in vogue & liable to be maintained in favor of the Respondent Department
- B. **Incorrect & not admitted,** the statement of the appellant is without any cogent reason & record as he has been treated as per Law vide the above said Notifications by the Respondents No. 1 & 2 in the titled case in accordance with the provision of Articles-4 & 25 of the constitution of 1973 hence, the stand of the appellant is liable to be rejected in terms of above made submissions by the Respondents.
- C. **Incorrect & not admitted.** The stand of the appellant is illegal as formal statement of allegation/Show Cause Notice has been served upon the appellant on dated 06-09-2022 also replied by the appellant.
- D. **Incorrect & not admitted.** The impugned Notifications dated 02-11-2022 & 16-02-2023 are within legal sphere & even in accordance with the law, furthermore, the job of the appellant was contractual w.e.f 14-09-2018 till 02-11-2022 & 16-02-2022 & does not cover the provision of Section-2 of Civil Servant Act-1973, hence, the claim of the appellant is liable to be rejected.
- E. **Incorrect & not admitted.** The stand of the appellant is illegal as formal statement of allegation/Show Cause Notice has been served upon the appellant on dated 06-09-2022 also replied by the appellant.

F. **Incorrect & not admitted** the statement of the appellant is baseless in terms of the fore made submission as the appellant is not an aggrieved person within the meaning of Section-4 of Khyber Pakhtunkhwa Service Tribunal Act-1974 read with Article 212 of the constitution of Islamic Republic of Pakistan 1973 However, the Respondents also seek leave of this Honorable Tribunal to submit additional grounds, record & case law at the time of arguments on the date fixed.

In view of the above made submissions, it is most humbly requested that this Honorable Tribunal may very graciously be pleased to dismissed the instant Service Appeal by maintaining the Notifications/orders dated 02-11-2022 & 16-02-2023 in favor of the Respondents in the interest of justice.

Dated ___/ ___/2023.



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



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

BEFORE THE HONORABLE KHYBER PAKHATUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No: 1559/2023

Syed Salman Hashmi SST (B/C) BPS-16, GHS No. 2 Bannu Appellant.

VERSUS

Secretary (E&SED) & others..... Respondents

AFFIDAVIT

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

[Handwritten Signature]
Deponent

ATTESTED

[Notary Seal]
AZMAT ALI AZKOR
Notary Public
2022-11-2023

BEFORE THE HONORABLE KHYBER PAKHATUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No: 1559/2023

Syed Salman Hashmi SST (B/C) BPS-16, GHS No. 2 Bannu Appellant.

VERSUS

Secretary (E&SED) & others..... Respondents

REPLY TO THE APPLICATION FOR CONDONATION OF DELAY

Respectfully Sheweth: -

The Respondents submit as under: -

FACTS:

- 1. That para-1 is correct.
- 2. That para-2 is incorrect as the appellant is not an aggrieved person within the meaning of Section-4 of Khyber Pakhtunkhwa Service Tribunal Act-1974 read with Article 212 of the constitution of Islamic Republic of Pakistan 1973, hence, the application in hand is liable to be dismissed on the following grounds inter alia: -

GROUNDS:


A. Incorrect & not admitted, the impugned Notifications dated 02-11-2022 & 16-02-2023 are within legal sphere & even in accordance with the law in vogue & liable to be maintained in favor of the Respondent Department


B. Incorrect & not admitted, the statement of the appellant is without any cogent reason & record as he has been treated as per Law vide the above said Notifications by the Respondents No. 1 & 2 in the titled case in accordance with the provision of Articles-4 & 25 of the constitution of 1973 hence, the stand of the appellant is liable to be rejected in terms of above made submissions by the Respondents.

C. Incorrect & not admitted. The stand of the appellant is illegal as formal statement of allegation/Show Cause Notice has been served upon the appellant on dated 06-09-2022 also replied by the appellant, whereas the judgments reported as 2004 PLC (CS) P-1014 & 2003 PLC(CS) P-76 are not applicable upon the case of the appellant.

In view of the above made submissions, it is most humbly requested that this Honorable Tribunal may very graciously be pleased to dismissed the instant application by maintaining the Notifications/orders dated 02-11-2022 & 16-02-2023 in favor of the Respondents in the interest of justice.

Dated ___/ ___/2023.


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


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

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) BANNU

No. 10855 / ADEO Secy:

Dated 6/9 /2022.

To,

Mr. Syed Salman Hashmi SST
GHS No.2 Bannu.

Subject: - DISCIPLINARY PROCEEDING / CHARGE SHEET

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

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

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

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

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

DISTRICT EDUCATION OFFICER
(MALE) BANNU

Endst: No. 10856-58 Dated as above.

Copy to:-

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

DISTRICT EDUCATION OFFICER
(MALE) BANNU

The District Education Officer,
District Bannu.

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

Respected Sir,

2073
With utmost respect, it is stated that I received your letter (No. 10955) dated 06/09/2022 from your office. In the said letter, your good self has pointed out that I was found rude during my official duty. With due respect sir, I have not met you in person, nor spoke to you in any capacity thus far. In the light of aforementioned facts, it is a bit saddening and astonishing to know that you have adjudged me rude. With due respect, I feel like you might have mistaken me for somebody else. I have never been rude to you, or any other officer, both in office and at my school. I am pretty sure that whenever we meet in person, you would realize for a fact that this allegation is just some misunderstanding.

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

ADEO S/Hasan
D/MS
7/9/22

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



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

Phone: 091-9225344

Email: establishmentmale1@gmail.com

OFFICE ORDER


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

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

Endst: No. 5638-110 /F.No.1 /SST (M) Disciplinary Action Dated 02/11 2022

Copy of the above is to the:-

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


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



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

12
11
16

NOTIFICATION

Dated Peshawar the 16th February 2023

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

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

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

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

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

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

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



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block "A" Opposite M PA's Hostel, Civil Secretariat Peshawar (192)
Phone No. 091-9223587

Endst: No & date even:

Copy forwarded to:

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

(MUHAMMAD ISHAQ)
SECTION OFFICER (PRIMARY)

16/7/23

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION

KHYBER PAKHTUNKHWA PESHAWAR.

13 (13)

NOTIFICATION

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

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

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

Terms and Conditions: -

1. His service shall be governed by the Khyber Pakhtunkhwa Civil Servant Act, 1973, the Khyber Pakhtunkhwa (Appointment, Deputation, Posting and Transfer of Teachers, Lecturers, Instructor and Doctors) Regularity Act, 2011, and such rules and regulation as may be issued from time to time by Government.

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

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

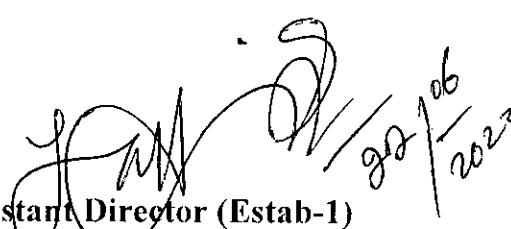
Director

Elementary and Secondary Education
Khyber Pakhtunkhwa, Peshawar

3522-23.
Endst: No. _____ /File No./B-1/SST (M)/Regularization/2018-22/Bannu Dated Peshawar the 29/06/2023.

Copy forwarded for information and necessary action to the: -

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


Assistant Director (Estab-1)
Elementary and Secondary Education
Khyber Pakhtunkhwa, Peshawar
29/06/2023

1/c

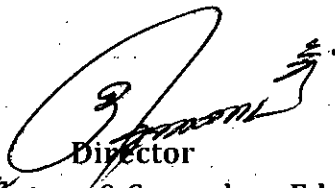


**DIRECTORATE ELEMENTARY & SECONDARY
EDUCATION KHYBER PAKHTUNKHWA, PESHAWAR.**

AUTHORITY LETTER

I Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar do hereby authorize Mr. Muhammad Imran Assistant (Litigation) of this Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar to attend the Khyber Pakhtunkhwa Service Tribunal in connection with filing of para wise comments in Service Appeal No. 1559/2023 Titled Syed Salman Hashmi VS Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department.

Dated ____/____/2023


Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.