

20. 07.07.2017

Counsel for the appellant and Mr. Muhammad Jan, Deputy District Attorney for the respondents present. Counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 27.10.2017 before D.B.

(Gul Zeb Khan)  
Member

(Muhammad Hamid Mughal)  
Member

27.10.2017

Counsel for the appellant and Mr. Kabeerullah Khattak, Addl. Advocate General alongwith Hameedullah, Assistant Director of the respondents present.

2. Both the learned counsel for the parties agreed on the point that if this appeal is disposed of in the terms that the department shall calculate the quota of promotees in accordance with the prevalent rules at different stages and then the department shall consider only those appellants and others who are eligible and fit in accordance with the calculation of the department.

3. In view of the above, the respondents are directed that they should calculate the quota of promotees in accordance with the prevalent rules at different stages and then they should consider all those who are eligible and fit for promotion at different stages.

4. The appeal is disposed of in the above terms. Parties are left to bear their own costs. File be consigned to the record room.

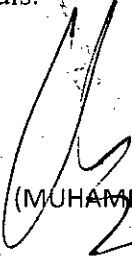
(Ahmad Hassan)  
Member


(Niaz Muhammad Khan)  
Chairman

ANNOUNCED  
27.10.2017

26.01.2017

Counsel for the appellant and Mr. Ziaullah, GP for respondents present. Counsel for the appellant submitted that similar nature of appeals are pending adjudication before this Bench titled. Ibrahim Khan,-vs-Government which are fixed on 16.03.2017, therefore, the same may also be clubbed with the said appeals. Request accepted. To come up for arguments on 16.03.2017 alongwith connected appeals.

  
(MUHAMMAD AAMIR NAZIR)  
MEMBER

  
(AHMAD HASSAN)  
MEMBER

16.03.2017

Mr. Taimur Khan, junior counsel for appellant and Mr. Muhammad Adeel Butt, Additional AG for respondents present. Junior counsel for appellant requested for adjournment as senior counsel for appellant is stated busy in the Hon'ble Peshawar High Court. Adjournment granted. To come up for arguments on 07.07.2017 before D.B.

  
(ASHFAQUE TAJ)  
MEMBER

  
(MUHAMMAD AAMIR NAZIR)  
MEMBER

20.10.2015

Counsel for the appellant, M/S Khurshid Khan, SO and Muhammad Irfan, ADO alongwith Muhammad Jan, GP for respondents present. The worthy Member (Judicial) is on leave therefore, case is adjourned to 1-2-16 for arguments.

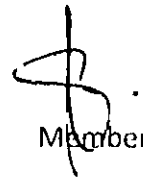
Member

28.04.2016

Clerk to counsel for the appellant and Mr. Muhammad Adeel Butt, Addl: AG for respondents present. Due to strike of the Bar learned counsel for the appellant is not available today before the Court, therefore, case is adjourned for arguments to 28.6.16.



Member



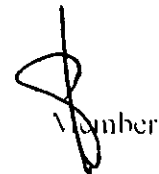
Member

28.06.2016

Junior to counsel for the appellant and Mr. Muhammad Jan, GP for respondents present. Junior to counsel for the appellant requested for adjournment as counsel for the appellant was busy before Peshawar High Court, Peshawar. To come up for arguments on 03.10.2016.



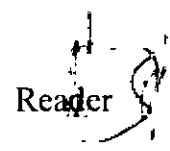
Member



Member

03.10.2016

Since 3<sup>rd</sup> October, 2016 has been declared as public holiday on account of 1<sup>st</sup> Muharram therefore, case is adjourned for the same on 26-1-17.



Reader

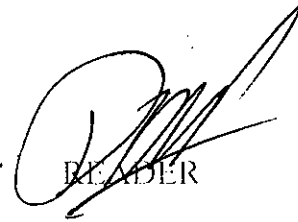
20.11.2014

Junior to counsel for the appellant and Mr. Muhammad Jan, GP with Inayatullah, ADO for the respondents present. The Tribunal is incomplete. To come up for the same on 19.12.2014.

  
READER

19.12.2014

Clerk to counsel for the appellant and Mr. Kabeerullah Khattak, Asstt. AG with Muhammad Irfan, ADO for the respondents present. The Tribunal is incomplete. To come up for the same on 16.01.2015.

  
READER

16.1.2015

Appellant in person present. Mr. Muhammad Jan, GP with Inayatullah, ADO and Mosam Khan, AD for the respondents present and reply filed, copy whereof is handed over to appellant. To come up for rejoinder on 19.3.2015.

  
MEMBER

19.3.2015

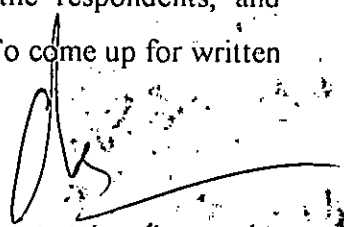
Appellant with counsel and Mr. Muhammad Jan, GP with Muhammad Irfan, ADO and Mosam Khan, AD for the respondents present. Rejoinder received. To come up for arguments on 20.10.2015.

MEMBER

  
MEMBER

04.7.2014

Appellant in person, M/S Inayatullah, ADO on behalf of respondent No.2 and Hamad Ahmad, Assistant on behalf of respondent No.3 with AAG for the respondents present. Written reply has not been received on behalf of the respondents, and request for further time made on their behalf. To come up for written reply/comments on 5.9.2014.

  
Member

5.9.2014

Appellant in person, M/S Khurshid Khan, SO for respondent No. 1 and Inayatullah, ADO for respondent No. 2, with Mr. Usman Ghani, Sr.G.P for the respondents present. Written reply has not been received; and representative of respondent No.2 pointed out that connected cases are pending before learned Bench-II, where next date fixed is 16.10.2014. In the interest of justice and in order to ward off possibility of conflicting decisions, this appeal is also entrusted to learned Bench-II, where the parties are directed to appear for written reply/comments alongwith connected appeal on 16.10.2014.

  
Chairman

16.10.2014

Counsel for the appellant, and Mr. Muhammad Jan, GP with Inayatullah, ADO for the respondents present and requested for time. To come up for written reply by way of last chance on 20.11.2014.

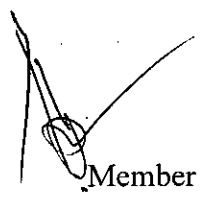
  
MEMBER

Appeal No. 1593/2013  
Mr. Jam Alam

3. 11.02.2014

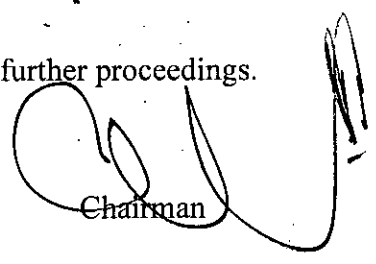
Appellant with counsel present. Preliminary arguments heard and case file perused. Counsel for the appellant contended that the appellant has not been treated in accordance with law/rules. He further contended that the appellant was appointed as Naib Qasid and still working for more than 21 years. He is highly qualified and has passed SSC, F.A; that the Government of Khyber Pakhtunkhwa has fixed 33% quota for Class-IV with SSC qualification for the promotion to the Junior Clerk post. But despite of that fixed quota and having eligibility, the appellant was never consider for promotion to the post of Junior Clerk. The appellant filed application on 24.06.2013, which has not been responded within the statutory period of 90 days, hence the instant appeal on 22.10.2013. Points raised at the Bar need consideration. The appeal is admitted to regular hearing subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, Notice be issued to the respondents for submission of written reply on 06.05.2014.

Appellant Deposited  
Security & Process Fee  
Rs. 180/- Bank  
Receipt is Attached with File.  
Jm

  
Member

4. 11.02.2014

This case be put before the Final Bench I for further proceedings.

  
Chairman

6.5.14



The Hon'ble Bench is on  
Hols. Therefore case is adjad  
on 4.7.14.

  
Reader

Form- A  
FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No. 1593/2013

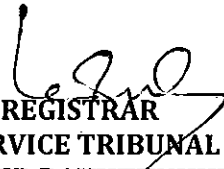
S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	09/12/2013	<p>The appeal of Mr. Jan Alam resubmitted today by Mr. Muhammad Asif Yousafzai, Advocate may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p>
2	19-12-2013	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>11-2-2014</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mr. Jan Alam Class-IV GHS Mullah Kili Nowshera received today i.e. on 22.10.2013 is incomplete on the following scores which is returned to the counsel for the appelliant for completion and resubmission within 15 days.

- 1- Copy of Notification mentioned in para-3 of the memo of appeal is not attached with the appeal which may be placed on it.
- 2- Copy of impugned order is not attached with the appeal which may be placed on it.
- 3- Copy of departmental appeal is not attached with the appeal which may be placed on it.
- 4- Annexures of the appeal are illegible which may be replaced by legible/better one.
- 5- Annexures of the appeal may be attested.
- 6- Five more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1505 /S.T,

Dt. 23/10 /2013.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Muhammad Asif Yousafzai Adv. Pesh.

*Resubmitted with compliance*  
*Asif*



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

Appeal No. 1593 /2013

Mr. Jan Alam

V/S

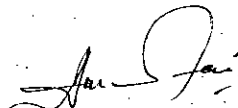
Education Department.

**INDEX**

S.No.	Documents	Annexure	Page No.
1.	Memo of Appeal	-----	01-03
2.	Copy of Appointment Order	/ - A -	04
3.	Copy of SSC	/ - B -	<del>05</del>
4.	Copy of F.A.	/ - C -	<del>06</del>
5.	Copy of Notification	- D -	<del>07</del>
6.	Copy of Departmental Appeal	/ - E -	<del>08</del>
7.	Copy of Judgment dt.30.01.2009	- F -	<del>09</del> 12
8.	Copy of Judgment dt.21.10.2011	- G -	<del>13</del> 15
9.	Copy of Judgment dt.11.01.2012	- H -	<del>16</del> 19
10.	Vakalat Nama	-----	20

Appellant  
Jan Alam

Through:

  
( M. ASIF YOUSAFZAI )  
ADVOCATE, PESHAWAR.

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

Appeal No. 1593 /2013

Mr. Jan Alam, Class-IV,  
Government High School,  
Mulla Kili Nowshera.

1504  
22/10/13

**APPELLANT**

VERSUS

1. The Director Education (S&SE), Peshawar.
2. The EDO (E&SE), Nowshera.
3. The Secretary, Finance Department, Khyber Pakhtunkhwa,  
Peshawar.

**RESPONDENTS**

.....

APPEAL UNDER SECTION-4 OF THE KPK SERVICE TRIBUNAL ACT 1974 FOR DIRECTION THE RESPONDENT TO CONSIDER THE APPELLANT FOR PROMOTION TO THE POST OF JUNIOR CLERK UNDER 33% FIXED QUOTA BY THE GOVERNMENT AND AGAINST NOT TAKING ANY ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT.

.....

**PRAYER:**

THAT ON ACCEPTANCE OF THIS APPEAL, THE RESPONDENTS MAY BE DIRECTED TO CONSIDER THE APPELLANT FOR PROMOTION TO THE POST OF JUNIOR CLERK UNDER 33% QUOTA FIXED BY THE GOVERNMENT FROM HIS DUE DATE/AVAILABILITY OF FUND WITH ALL CONSEQUENTIAL BENEFITS. ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT THAT MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.

re-submitted to ~~day~~  
and filed.

22/10/13  
9/12/13

## **RESPECTFULLY SHEWETH:**


1. That the appellant joined the respondent department on 31.05.1992. The appellant more than 21 years service with good record through out at his credit. Copy of Appointment Order is attached as Annexure-A.
2. That the appellant is highly qualified and has passed SSC, F.A. Typing Course with 21. yeas experience. Copy of Certificates are attached as Annexure-B & C.
3. That the Government of KPK has fixed 33% quota for Class-IV with SSC qualification for the promotion to the Junior Clerk post. But despite of that fixed quota and having eligibility, the appellant was never consider for promotion to the post of Junior Clerk. Copy of Notification is attached as Annexure-D.
4. That the appellant fled Departmental Appeal for his claim on 24.06.2013 and waited for 90 days, but no reply has been received by the respondent to the appellant so far, hence the present appeal following grounds amongst the others: Copy of Departmental Appeal is attached as Annexure-E.

## **GROUND:**


- A) That not granting pay benefits of higher post of Junior Clerk and not considering the appellant for regular promotion under 33% quota is against the norms of justice and material on record.
- B) That the appellant is senior most eligible and qualified Class-IV employee and he is entitled to be promoted as Junior Clerk under 33% reserved quota.
- C) That the appellant has been kept deprived from his legal right of promotion which is not tenable under the norms of justice and fair play.
- D) That the respondent department has never observed 33% quota, rather the department promoted the most junior person under 33% quota who were junior to appellant. Thus, the promotion order issued by the respondent department of the most junior person is highly discriminatory and based on nepotism.

- E) That similar appeal have already been decided by this august Tribunal Appeal No.769/2008 decided on 30.1.2009, Appeal No.1604/2010 decided on 21.1.2011 and appeal No.104/2011, and No.323/2011 decided on 11.1.2012. Thus, the appellant also deserves the same treatment under the principle of consistency being similarly placed person. Copies of the Judgments are attached as Annexure- F, G & H.
- F) That the appellant has not been treated according to law, rules governing the 33% quota of appellant.
- G) That the appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is, therefore, humbly prayed that the appeal of the appellant may be accepted as prayed for.

  
Appellant  
Jan Alam

Through:

  
( M. ASIF YOUSAFZAI )  
ADVOCATE, PESHAWAR.

**BETTER COPY****Annexure-A****OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) SECONDARY  
EDUCATION, NOWSHERA****APPOINTMENT**

Consequent upon selection/recommendation of the Selection Committee, Mr. Jan Alam S/O Fazli Elahi candidate is hereby appointed against pos of Naib Qasid in BPS No.1 of Rs.920-26-1310 PM plus usual allowances as admissible under the rules with effect from the date of his taking over charge at GMS Baghban Pura in the interest of public, on the terms and conditions noted below:

**TERMS AND CONDITIONS:**

1. The appointment is purely temporary and liable to be terminated at any time without assigning any reason.
2. The case of resignation they will have to submit as month prior notice to the department or forfeit one month pay from the Government Servant.
3. They are required to produce Health and Age Certificate from the Medical authorities concerned before taking over charge in case they are not Government Servant.
4. They are not allowed to take over charge if their age is less than 18 years and above than 30 years.
5. All original educational character and liability certificate may be verified by the Head of Institution before handing and taking over charge.
6. If they fail to take over charge of the post with in seven days from the issue of this order, the appointment will be automatically considered as cancelled.
7. Charge report should be submitted to all concerned.
8. No TA/DA etc is allowed.

(Muhammad Zaman Khan)  
District Education Officer,  
(Male) Secy: Nowshera.

Endst. No.937-40/C-IV;

Dated 31.05.1992.

Copy forwarded for information and n/a to the:

1. District Accounts officer, Nowshera.
2. Head Master GMS Baghban Pura Nowshera.
3. Candidate concerned.
4. P. File.

District Education Officer,  
(Male) Secy: Nowshera.

A  
W

OFFICER OF THE DISTRICT EDUCATION OFFICER (MALE) SECY NOWSHERA.  
APPOINTMENT.

Consequent upon selection/Re-Commandation of the Selection Committee, Mr. Jan Alam S/O Fazli Elahi candidate is hereby appointed against post of N/Q in BPS: No. 1 of Rs;= 920-26-1310 PB plus usual allowances as admissible under the rules with effect from the date of his taking over charge at GMS Baghban Pura against the vacant ~~XXXXXX~~ on the terms and conditions noted below.

TERMS & CONDITION:-

1. The appointment is purely temporary and liable to termination at any time without assigning any reason or notice.
2. In case of resignation they will have to submit one month prior notice to the Deptt: or forfeit one month pay from the Govt: Servant/.
3. They are required to produce Health and Age Certificate from the Medical authorities concerned before taking over charge in case they are not Govt; Servant.
4. They are not allowed to take over charge if their age is less than 18 Years and above than 30 Years.
5. All original Educational Character and School Certificate must be verified by the Head of Institution concerned before handing over charge.
6. If they fail to take over charge of the post within seven days from the issue of this order the appointment will be automatically considered as cancelled.
7. Charge report should be submitted to all concerned.
8. No. TA/Da etc is allowed.

(MOHAMMAD ZAMAN KHAN)  
DISTRICT EDUCATION OFFICER,  
MALE) SECY NOWSHERA.

Endst; No. 937-40/C-IV

/App: dated HERE: 31-05-1992.

Copy forwarded for information and n/o to the:-

- 1:- ~~XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX~~
  - 2:- District Accounts Officer Nowshera.
  - 3:- Head Master GMS Baghban Pura Nowshera.
  - 4:- Candidate Concerned.
- P. File.

DISTRICT EDUCATION OFFICER  
(MALE) SECY NOWSHERA.

ATTESTED

S. No 283501

بورد التعلیم و تربیت  
پشاور

B

S

Roll No. 13092

# Board Of Intermediate And Secondary Education Peshawar N. W. F. P. Pakistan



## Secondary School Certificate Examination

SESSION 1979 (SUPPLEMENTARY)

This is to certify that Jan Alam  
Son/Daughter of Fazli Elahi  
and a student of Peshawar District.

has passed the **SECONDARY SCHOOL CERTIFICATE EXAMINATION**  
of the Board of Intermediate and Secondary Education, Peshawar held in October 1979  
as a Private candidate He/She obtained 415 Marks out of 850/900/1000x  
and has been placed in Grade  Representing Fair

The Candidate passed in the following subjects:

- |              |                         |                     |
|--------------|-------------------------|---------------------|
| 1. English   | 4. Pakistan Studies.    | 7. Islamic Studies. |
| 2. Urdu      | 5. General Science.     | 8. Pashto.          |
| 3. Islamiyat | 6. General Mathematics. |                     |

Date of birth according to admission form is Fifteenth March  
one thousand nine hundred and Sixty Four (15-3-1964)

*[Signature]*  
Asstt. Secretary

16th January 1980

*[Signature]*  
SECRETARY

This certificate is issued without alteration or erasure.

S. No 118483

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

C

6

Roll No. 15243

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION



Peshawar N.W.F.P. Pakistan  
Intermediate Examination

Humanities Group

SESSION 1982 (ANNUAL)

Jan Alam

THIS IS TO CERTIFY THAT

Son/Daughter of

Fazal Elahi

and a resident of

Peshawar District.

910-B/P-82

Registered No.

has passed the Intermediate Examination of

the Board of Intermediate & Secondary Education, Peshawar held in May/June, 1982

as a Private Candidate. He/She obtained

479

Marks out of 1000

and has been placed in Grade

D

Representing

Fair

The Examination was taken as a whole/ in parts

ATTESTED

[Signature]

Asstt. Secretary

5th September 1982

Secretary

This certificate is issued without alteration or erasure



A  
7

GOVERNMENT OF NWFP  
ESTABLISHMENT & ADMINISTRATION DEPARTMENT.

**NOTIFICATION**

Peshawar, dated the 04 January, 2009

No.SOE-III(E&AD)1-8/2008:- In pursuance of provisions contained in sub-rules(2) of Rule-3 of the North West Frontier Province, the servants (Appointment, Promotion and Transfer) Rules, 1989, the Establishment and Administration Department in consultation with the Finance Department, hereby direct that in this Department's Notification No.SOR-1(S&GAD)4-2/82; dated 8<sup>th</sup> June, 1988, the following further amendments shall made namely:

**AMENDMENTS**

In the Appendix, for the existing entries in columns No.3, 4 and 5 against serial No.7, the following shall be substituted in the in the respective columns, namely:

(1)	Secondary School Certificate or equivalent qualification form a recognized Board; and	18030 years	(a) Thirty three percent by promotion, form amongst Daftaries and Naib Qasids or other equivalent posts with two yeas service as such who have passed Secondary School Certificate Examination; and
(ii)	A speed of 30 words per minutes in typing.		(b) Sixty seven percent by initial recruitment.

Note: For the purpose of promotion there shall be maintained a common seniority list of Daftaries and Naib Qasids etc with reference to the date of their acquiring the Secondary School Certificate:

Certified that:-

- (i) If two or more officials have acquired the Secondary School Certificate in the same session, the official having longer service shall rank senior to other officials, and
- (ii) Where a senior official dose not possess the requisite experience at the time of filling up a vacancy, the official next junior to him possessing the requisite experience shall be promoted in preference of the senior official or officials.

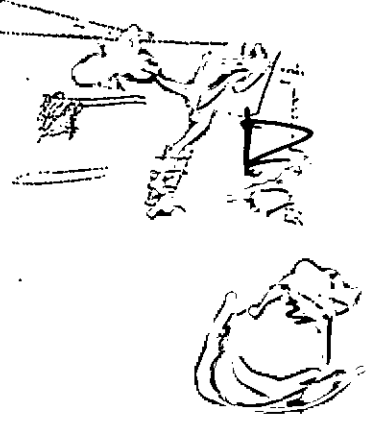
SECRETARY TO GOVERNMENT OF THE  
NORTH WEST FRONTIER PROVINCE  
ESTABLISHMENT & ADMINISTRATION DEPARTMENT.

**ATTESTED**  




GOVERNMENT OF NORTH-WEST FRONTIER PROVINCE  
ESTABLISHMENT & ADMINISTRATION DEPARTMENT  
ISLAMABAD

7



NOTIFICATION

Issued on the 6th July, 2009

NO. SOE-III(E&AD)1-6/2009. - In pursuance of the provisions contained in sub-rule (2) of Rule 3 of the North-West Frontier Province Servants (Appointment, Promotion & Transfer) Rules, 1959, the Establishment and Administration Department, in consultation with the Finance Department, hereby directs that in this Department's Notification No. SOE-(S&G&D)4-2/82, dated 8th June, 1988, the following further amendments shall be made, namely:

AMENDMENTS

In the Appendix, for the existing entries in columns No. 3, 4 and 5 against serial No. 7, the following shall be substituted in the respective columns, namely:

3	4	5
(i) Secondary School Certificate or equivalent qualification from a recognized Board; and	18 - 30 years.	a) This shall be open to promotion from amongst Dafnias and Naib Qasids or other equivalent posts with two years service as such, who have passed Secondary School Certificate Examination; and
(ii) A speed of 30 words per minute in typing.		b) Sixty-seven per cent by initial recruitment.

Note:- For the purpose of promotion, the following shall be maintained in the list of Dafnias and Naib Qasids etc with reference to the dates of their acquiring the Secondary School Certificate

- that:
- (i) if two or more officials have acquired the Secondary School Certificate in the same session, the official having longer service shall rank senior to other officials; and
  - (ii) where a senior official does not possess the requisite experience at the time of filling up a vacancy, the official next junior to him possessing the requisite experience shall be promoted in preference of the senior official or officials.

**ATTACHED**

SECRETARY TO GOVERNMENT OF THE  
North-West Frontier Province  
ESTABLISHMENT & ADMINISTRATION  
DEPARTMENT

**ATTACHED**



Copy forwarded to:

1. The Additional Chief Secretary, NWFP
2. The Additional Chief Secretary (E&A), Peshawar
3. The Senior Member, Board of Revenue, NWFP
4. All Administrative Secretaries to Government of NWFP
5. The Accountant General, NWFP, Peshawar
6. The Registrar, Peshawar High Court, Peshawar
7. The Secretary to Governor, NWFP
8. The Principal Secretary to Chief Minister, NWFP
9. All Divisional Commissioners in NWFP
10. All District Coordination Officers in NWFP
11. All Heads of Attached Departments in NWFP
12. The Secretary, NWFP Public Service Commission, Peshawar.
13. The Director, Anti-Corruption Establishment, NWFP, Peshawar.
14. The Registrar, NWFP Service Tribunal, Peshawar.

(Sandy Samzeela Sabhat) )  
 Senior Officer (B-111)

Order No. SOE-IKE&AD)1-9/2009

Dated: 04th February, 2009

Copy forwarded to:

1. The Special Secretary, E&A Department, NWFP
2. The Director, Staff Training Institute, Peshawar
3. All Additional Secretaries, E&A Department, NWFP
4. The Reforms Coordinator, E&A Department
5. All Deputy Secretaries in E&A Department, NWFP
6. All Section Officers in E&A Department, NWFP
7. Private Secretary to Chief Secretary, NWFP
8. Private Secretary to Secretary, Establishment Department, NWFP
9. Librarian, E&A Department

(Sandy Samzeela Sabhat) )  
 Senior Officer (B-111)

*Handwritten notes and signatures:*  
 K. A. ...  
 ...  
 ...

To

The District Education Officer,  
(Male) Nowshera.

Subject:- APPEAL FOR PROMOTION UNDER 33% RESERVED  
QUOTA FOR CLASS-IV SERVANTS.

Memo,

It is submitted for your kind information that I have been performing my duty in E&SE Deptt: since 31-05-1992. At present I am working against Class-IV Post at GHS Mulla Killi Nowshera. I have passed my F.A Examination and completed typing course prior to my service. I am the senior most Class-IV servant in District Nowshera as revealed from the seniority list of class-IV Servants E&SE Deptt; Nowshera.

I have applied for promotion against J/Clerk posts out of 33 % reserved quota but due to unknown reason my application was not considered favorably. I have already performed my duty as Accounts Clerk at DEO Secondary Nowshera Office for the last 05 years in the light of Notification issued vide DEO Secondary Nowshera endstt No.432-36 dated 03-10-1999.

Some class-IV servants being junior to me have already been promoted to J/Clerk posts out of 33 % reserved quota and thus I have been deprived from my legal right.

It is therefore requested that I may please be promoted to J/Clerk post out of 33 % reserved quota as due and admissible to me under the rules.

*Forwarded to District  
Education officer (Male)  
Nowshera for necessary  
action Pl.*

*24.6.13*  
Head Master  
G.H.S. Mulla Killi  
Distt: Nowshera

Yours Obediently,

*Jan Alam*  
(MR. JAN ALAM)  
Class-IV.  
GHS Mulla Killi Nowshera.

*D.No. 1436.*

*dt: 24.6.13.*

ATTESTED  
*A*

BEFORE THE N.W.F.P. SERVICE TRIBUNAL, PESHAWAR.

APPEAL NO. 769/2008

Date of institution .... 30.05.2008  
Date of decision .... 30.01.2009



Sharif Khan, Naib Qasid,  
Office of the Political Agency, Khyber Agency..... (Appellant)

VERSUS

1. Regional Co-ordination Officer, Northern Region, Peshawar.
2. The Political Agent, Khyber Agency.
3. Mr. Haq Nawaz, Junior Clerk,  
Political Agent's office Khyber Agency..... (Respondents)

APPEAL U/S 4 OF THE NWFP SERVICE TRIBUNALS ACT, 1974  
AGAINST THE ORDER DATED 24.4.08, WHEREBY JUNIOR  
NAIB QASID HAS BEEN PROMOTED AND AGAINST THE  
FINAL REJECTION ORDER DATED 24.5.2008, WHEREBY THE  
DEPARTMENTAL APPEAL OF THE APPELLANT HAS BEEN  
REJECTED FOR NO GOOD GROUNDS.

Mr. Muhammad Asif Yousafzai,  
Advocate..... (For appellant)  
Mr. Arshad Alam, A.G.P..... For official respondents  
Mr. Khalid Rehman, Advocate..... For respondent No.3  
Mr. Justice (R) Salim Khan..... Chairman  
Mr. Bismillah Shah..... Member

JUDGMENT

JUSTICE (R) SALIM KHAN, CHAIRMAN:- The appellant

contended that he joined the respondent department as Naib Qasid on 1.5.1986. The name of the appellant was at the top of the seniority list. The appellant qualified SSC examination. The official respondents issued promotion order of private respondent No.3 (Haq Nawaz) in violation of seniority position on 24.4.2008. The appellant filed departmental appeal on 10.5.2008 against the said order but the same was rejected on 24.5.2008. The present appeal was filed on 30.5.2008. The departmental appeal and this service appeal are within time.

2. The respondents contested the appeal. It was contended by the respondent No.3 that this Tribunal had no jurisdiction, that the appellant passed SSC examination in 2007, that no appeal could be filed to Service Tribunal regarding the determination of fitness or otherwise of a person to be appointed to a higher

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ATTESTED

post or grade. Respondent No.2 admitted that the name of the appellant was at the top of the seniority list but he was not considered for promotion for two reasons:-

- (i) that the appellant had qualified SSC examination in the year 2007 while respondent No.3 had qualified that examination in 1994, therefore, respondent No.3 was considered senior to the appellant,
- (ii) the age of the appellant was more than 45 years and he was not eligible for promotion in accordance with the Notification dated 18.8.1991.

4. We heard the arguments and perused the record.

5. The comments of Political Agent Khyber dated 21.5.2008 in his letter to the Regional Coordination Officer, Northern Region at Peshawar shows that the appellant was ignored for promotion for two reasons:

- (i) that he was over-age,
- (ii) that he was not so promoted in January 2007 also and the appellant had not objected to that order.

It means that the Political Agent had not taken up the point of passing of examination by respondent No.3 earlier in time during his mentioned correspondence, and the issue is an after-thought for the purposes of this appeal only.

6. The Notification No.E&A(A.D)4(17)/2003 dated 17.4.2004 is regarding the post of Daftari (and not the post of Junior Clerk). The issue of posting of the appellant as Daftari is not <sup>under</sup> discussion in this case, therefore, the mentioned rule is not applicable. It was for the official respondents to consider that who had passed SSC examination earlier in time, when they wanted to promote a person as Daftari.

7. The Notification No.SOE.IV(E&AD)/1-35/2002 dated 01.12.2006 was

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EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

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Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

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regarding amendment in column 5 against Serial No.9, in clause (b), of the Notification No.SOR-I (S&GAD)4-7/86(A), dated 21.12.1982. It contained that the words mentioned in clause (b) "and under 45 years of age" before semi-colon shall be deleted. Serial No.9 of the mentioned Appendix was regarding the post of Junior Clerk. The words "or below forty five years of age" stood deleted from the mentioned method of recruitment for the post of Junior Clerk. There was no conditional priority of passing SSC examination earlier in time for the purpose of seniority, though, as already mentioned, there was such a condition for the post of Daftari. The appellant, therefore, had to be retained as senior most when he passed examination in 2007 in spite of the fact that respondent No.3 had passed examination in 1994.

8. As for the issue of estoppel regarding promotion of another person as Junior Clerk in 2007 and silence by the appellant, it has come on record that the appellant passed SSC examination in ~~2007~~ 2007 only. He, therefore, had no cause of action against that person when he himself was not qualified by passing SSC examination. Silence of the appellant regarding the promotion of that person, even, if the appellant was qualified at that time, could be considered as estoppel in the case of that person only, but not as perpetual estoppel for all persons and for all times to come.

9. The official respondents appear to have mixed up the rules for the post of Daftari with the rules for the post of Junior Clerk, and did not pay attention to the amendment to the rules vide Notification dated 01.12.2006. It prejudiced the appellant and adversely affected his valuable right of consideration for promotion.

10. We, therefore, accept the present appeal, and direct the official respondents to consider the case of the appellant for promotion as Junior Clerk on the basis of merits and, if he is found fit and eligible, the appellant

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EXAMINER  
Khayber Pakhtunkhwa  
Service Tribunal

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Service Tribunal

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be promoted as Junior Clerk with effect from the date on which respondent No.3 was so promoted. The official respondents may either adjust respondent No.3 as Junior Clerk, but as junior to the appellant, if another post of Junior Clerk is available for him, or may revert him to his original post so that the only post of Junior Clerk becomes available for the appellant with effect from the date on which respondent No.3 was promoted as Junior Clerk to that post. The parties are, however, left to bear their own costs.

*Bismillah Singh*  
(BISMILLAH SHAH)  
MEMBER

*[Signature]*  
(JUSTICE (R) SALIM KHAN)  
CHAIRMAN.

ANNOUNCED  
30.01.2009

Date of Presentation of Application	3-3-2011
Number of Words	1600
Copying Fee	10-00
Urgent	2-00
Total	12-00
Name of Copyist	4
Date of Completion of Copy	3-3-2011
Date of Delivery of Copy	3-3-2011

Certified to be true copy

*[Signature]*  
CLERK  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

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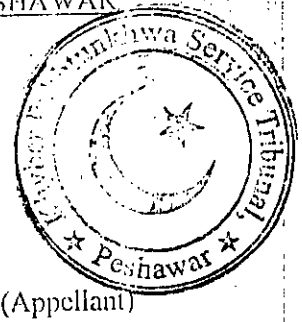
*[Signature]*



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Appeal No. 1604/2010

Date of Institution. ... 17.08.2010  
Date of Decision ... 21.10.2011



Mr. Yar Gul, Chowkidar,  
G.P.S Charabgan, Mardan.

(Appellant)

VERSUS

1. The District Coordination Officer, Mardan.
2. The EDO (E&S.E), Mardan.
3. DPC through its Chairman, EDO (E&SE) Mardan.
4. Mr. Alamzeb J. Clerk, GGHS Bago Banda Mardan. ... (Respondents)

APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE ORDER DATED 17.3.2010 WHEREBY JUNIOR OFFICIAL (RESPONDENT NO.4) HAS BEEN PROMOTED AS JUNIOR CLERK BY IGNORING THE APPELLANT AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN 90 DAYS.

MR. MUHAMMAD ASIF YOUSAFZAI,  
Advocate.

For appellant

MR. TAHIR IQBAL,  
Addl. Government Pleader

For official respondents

MR. NOOR MUHAMMAD KHATTAK,  
Advocate.

For respondent No.4.

SYED MANZOOR ALI SHAH,  
MR. KHALID HUSSAIN

MEMBER  
MEMBER

JUDGMENT

SYED MANZOOR ALI SHAH, MEMBER.- This appeal has been filed by appellant Yar Gul, against the order dated 17.3.2010, whereby junior to him was promoted while he was ignored. It has been prayed that on acceptance of the appeal, order dated 17.3.2010 may be set aside and the respondents may be directed to consider the appellant for promotion to the post of Junior Clerk under 33% quota reserved for promotion.

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Khyber Pakhtunkhwa Service Tribunal  
Peshawar

2. Brief facts of the case are that the appellant joined the Education Department as Chowkidar vide order dated 31.10.1987. He passed SSC examination in the year, 1989 and FA in the year, 2009 during service. He was at S.No.6 of the seniority list of Class-IV servants while respondent No.4, who joined the department in the year, 1988 was at S.No.18 of the seniority list. The provincial Government had fixed 33% quota for promotion of matriculate Class-IV servants to the post of Junior Clerk. The appellant according to the said notification was entitled to be promoted as Junior Clerk. The respondent department promoted private respondent No.4 on 17.3.2010. Feeling aggrieved, the appellant filed departmental appeal 17.4.2010, which elicited no response within the statutory period, hence this appeal.

3. Notices were issued to the respondents. Respondents No. 1 to 3 have filed their joint written reply while private respondent No.4 filed written reply through his counsel and contested the appeal. The appellant also filed rejoinder in rebuttal.

4. Arguments heard and record perused.

5. The learned counsel for the appellant argued that the appellant was appointed as Chowkidar in the year, 1987. He passed SSC examination in the year, 1989 and FA in the year, 2009. He was at S.No.6 of the seniority list. On the other hand private respondent No.4 was appointed in the year, 1988 and was at S.No.18 of the seniority list. Therefore, the appellant had more right over private respondent No.4 for consideration for promotion to the post of Junior Clerk against 33% quota reserved for promotion amongst Class-IV civil servants. He further argued that respondent No.4 has been promoted as Junior Clerk while the appellant has been ignored. Moreover, condition of age limit had already been quashed by the august Supreme Court of Pakistan as well as this Tribunal in judgment dated 30.4.2009 in Service Appeal No. 2380/1997. He requested that the appeal may be accepted as prayed for.

6. Counsel for private respondent No.4 argued that as per Notification dated 12.2.2009, the age limit for promotion to the post of Junior Clerk is upto 30 years, whereas the appellant is over and above 45 years of age, therefore, he is not entitled to be promoted to the post of Junior Clerk. On the other hand, the appellant being qualified, eligible and within the prescribed age limit rightly been promoted as Junior Clerk. He further argued that that the Tribunal has no jurisdiction to give directions to the respondent department to fill the posts in promotion quota. He relied on PLD-1994-Supreme Court-539. He requested that the appeal may be dismissed.

7. Perusal of record would show that the appellant was at S.No.6 while private respondent No. 4 was at S.No. 18 of the seniority list of Class-IV of the respondent department. Private respondent No.4 was promoted as Junior Clerk under 33% quota reserved for promotion while the appellant was ignored on the plea that he had crossed the


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... otherwise he was fully qualified to be promoted against the post of Junior Clerk. Since condition of upper age limit had already been quashed by the august Supreme Court of Pakistan, therefore, he was entitled to be considered for promotion alongwith his colleagues and by not doing so, he has been discriminated.

In view of the above, the appeal is accepted, and the respondent department is directed to consider the appellant for promotion against the post of Junior Clerk from the date when his juniors were promoted. No order as to costs. File be consigned to the record.

APPLICANT NOTED  
11.12.2011

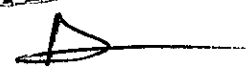
  
(INQOR ALI KHANI)  
MEMBER

  
(SYED MANZUOR ALI SHAH)  
MEMBER

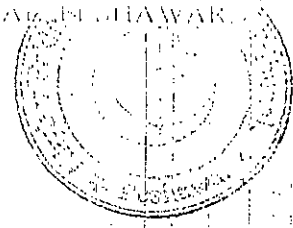
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KIMBERLY CLERK  
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Peshawar

Date of Presentation of Application 28.12.2011  
No. of Pages 1200  
Copying Fee 8  
Urgent 2  
Total 10  
Name of Court \_\_\_\_\_  
Date of Court Order 28.12.2011  
Date of Delivery of Copy 28.12.2011

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Appeal No. 104/2011



H (16)

Date of Institution. .... 22.1.2011  
Date of Decision ... 11.1.2012

**WY. Zahoor Jan** Junior Clerk, Government High School No.1, Nowshera Kalan...

(Appellant)

VERSUS

1. The District Coordination Officer, Nowshera.
2. The EDOR(E&S.F.), Nowshera.
3. The Secretary Government of Khyber Pakhtunkhwa, Finance Department, Peshawar.

(Respondents)

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 FOR GRANTING FULL MONITORY BENEFITS OF JUNIOR CLERK GRADE AND SCALE SINCE 13.2.2010 TILL DATE AND ONWARDS, AND FOR REGULAR PROMOTION TO JUNIOR CLERK UNDER 33% QUOTA.

MR. MUHAMMAD ASIF YOUSAFZAI,  
Advocate.

For appellant.

MR. FAHIM IQBAL,  
Addl. Government Teacher.

For respondents.

MR. SULTAN MAHMOOD KHATTAK,  
MR. NOOR ALI KHAN,

MEMBER  
MEMBER.

JUDGMENT

SULTAN MAHMOOD KHATTAK, MEMBER.- This appeal has been filed by Zahoor Jan, the appellant, under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 for granting full monetary benefits of the post of Junior Clerk and since 13.2.2010 for regular promotion to Junior Clerk under 33% quota. It has been prayed that on acceptance of the appeal, the respondents may be directed to grant pay benefits of higher scale (Junior Clerk post) w.e.f. 13.2.2010 with all consequential benefits. The respondents may further be directed to consider the appellant for regular promotion to Junior Clerk post under 33% quota fixed by the Government.

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Services Tribunal  
Peshawar

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Brief facts of the case are that the appellant joined the respondent department on 3.10.1993 as Laboratory Attendant. The appellant has more than 17 years service at his credit with qualification of M.A. He was adjusted against the post of Junior Clerk (BPS-7) in his own pay and scale, by the competent authority, vide order dated 13.2.2010. The Government of Khyber Pakhtunkhwa has fixed the 33% quota for Class IV, having the qualification of SSC for promotion against the post of Junior Clerk but the appellant has not been considered for promotion till date. The appellant filed departmental appeal on 7.10.2010, which elicited no response within the statutory period, hence the present appeal.

3. The appeal was admitted to regular hearing on 22.3.2011 and notices were issued to the respondents for submission of written reply. Respondents have filed their joint written reply and contested the appeal. Rejoinder was also filed in rebuttal. Arguments heard and record perused.

4. The learned counsel for the appellant argued that the appellant was appointed as Laboratory Attendant on 3.10.1993, having the qualification of SSC. He further acquired qualification of M.A during service. Being highly qualified, the appellant was adjusted as Junior Clerk on 13.2.2010 in his own pay and scale instead of consideration on regular basis. Even without monetary benefits, which is against the verdict of august Supreme Court of Pakistan. Moreover, the Hon'ble Tribunal in Service Appeal No. 59/2006, decided on 15.6.2006 allowed monetary benefits in accordance with the law. So far as the question of seniority is concerned, it was the responsibility of the respondent department to issue seniority list on yearly basis. He stated that the matter pertains to terms and conditions of service of the appellant, this Tribunal has ample jurisdiction to entertain the present appeal. In this connection, the learned counsel for the appellant relied on PLD 2006 Supreme Court 246 (b). Counsel for the appellant referred to Service Appeal No. 1604/2010, decided on 21.1.2011, that this Hon'ble Tribunal has directed the respondents to consider the appellant for promotion with effect from the date junior to him were promoted. Moreover, cases of similar nature have already been decided in favour of the appellants in Service appeals No. 769/2008. Counsel for the appellant also produced copy of order No. 4235-39, dated 1.10.2009, whereby one Mr. Imad ud Din Naib Qasid holding diploma of "Associate Engineer" has been promoted against the vacant post of Junior Clerk against 33% quota which is junior to the appellant. He requested that the appeal may be accepted as prayed for.

The learned AGP argued that it is true that the appellant was adjusted as Junior Clerk on 13.2.2010 but in his own pay and scale. So he is not entitled to receive

ACCEPTED

2. Brief facts of the case are that the appellant joined the respondent department on 3.10.1993 as Laboratory Attendant. The appellant has more than 17 years service at credit with qualification of M.A. He was adjusted against the post of Junior Clerk (BPS-7) in his own pay and scale, by the competent authority, vide order dated 13.2.2010. The Government of Khyber Pakhtunkhwa has fixed the 33% quota for Class-IV, having the qualification of SSC for promotion against the post of Junior Clerk but the appellant has not been considered for promotion till date. The appellant filed departmental appeal on 7.10.2010, which elicited no response within the statutory period, hence the present appeal.

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The learned AGP argued that it is true that the appellant was adjusted as Junior Clerk on 13.2.2010 but in his own pay and scale. So he is not entitled to receive

ATTESTED

salary of that post. Since the appellant has not been considered for regular promotion and will be considered on his turn on the basis of 33% quota reserved for promotion. Moreover, there is no record produced by the appellant which show that the appellant is most senior official in class-IV employees. He requested that the appeal may be dismissed.

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6. The Tribunal observes that the respondents have never maintained any list pertaining to 33% quoted fixed for Class-IV employees and the respondents exercising pick and choose while promoting Class-IV employees to the post of Junior Clerk. The appellant has been posted as Junior Clerk in his own pay and scale and deprived of his promotion due to no valid reasons and improper exercise of discretion. As reported in PLD 2006 Supreme Court 246 (b) in case of depriving a civil servant of his legitimate right of promotion in an illegal manner and by improper exercise of discretion, this Tribunal has the jurisdiction under Section 4 (b) (i). The matter pertains to terms & conditions of service of the appellant which have been violated. The Tribunal further observes that the appellant has been made to work on higher post without benefits attached to that post which is violative of basic rights and according to the judgments of the august Supreme Court <sup>as reported in the PLD 1994 Supreme Court 233 (d)</sup> and this Tribunal judgment in Service Appeal No. 59/2006 dated 15.6.2006, the appellant is fully entitled to receive salary of that post. There were clear vacancies of Junior Clerk available in 33% quota which was never observed strictly, in accordance with law and rules and keeping seniority positions of the Class-IV employees. The respondent No.2 has made order in own pay and scale basis instead of regular promotions which is against the law. One Mr. Imadud Din has been promoted which is junior to the appellant.

7. In view of the above, the appeal is accepted, and the respondent department is directed to consider the appellant alongwith others against the posts lying vacant in 33% promotion quota immediately from the date when vacancy was available for them within 90 days with all service benefits from that date. The appellant is also entitled to full pay benefits of the post of Junior Clerk post from the date of adjustment as Junior Clerk in own pay and scale. Parties are left to bear their own costs. File be consigned to the record.

8. This order will also dispose of connected Service Appeal No. 323/2011, Hukhar Ali Versus DCO, Nowshera and others, in the same manner.

ANNOUNCED  
11-1-2012.

(NOOR ALI KHAN)  
MEMBER

(SUIFAN MAHMOOD KHATFAK)  
MEMBER

ATTESSED

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Certified to be true copy

Secretary  
Peshawar

# VAKALAT NAMA

NO. \_\_\_\_\_/20

IN THE COURT OF Service Tribunal Peshawar

Jan Alam (Appellant)  
(Petitioner)  
(Plaintiff)

VERSUS

Education Dept, (Respondent)  
(Defendant)

I/We Jan Alam (appellant)

Do hereby appoint and constitute **M.Asif Yousafzai, Advocate, Peshawar,** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.

I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

Dated \_\_\_\_\_/20

[Signature]  
(CLIENT)

ACCEPTED

[Signature]  
**M. ASIF YOUSAFZAI**  
Advocate

**M. ASIF YOUSAFZAI**  
Advocate High Court,  
Peshawar.

**OFFICE:**  
Room No.1, Upper Floor,  
Islamia Club Building,  
Khyber Bazar Peshawar.  
Ph.091-2211391-  
0333-9103240



(1)

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR**

Appeal No 1593/2013

Jan Alam .....Appellant

VERSUS

1- Director (E & S) Education Khyber Pakhtunkhwa, Peshawar & others.  
..... Respondents

**Respectively Sheweth**

Written comments/reply on behalf of respondent No 1, 2, 3.

**Preliminary Objections**

1. That the Appellant has no cause of action/locus standi to file the instant appeal.
2. That this honorable service tribunal has got no jurisdiction to entertain the present appeal.
3. That the present Appeal is bad for non-joinder and mis joinder of necessary parties.
4. That the instant appeal is badly time barred.
5. That the appellant has concealed material facts from this honorable service tribunal.
6. That the appellant is estopped by his own conduct, by deed and by law to file the instant appeal.
7. That the instant appeal is not maintainable in its present form.

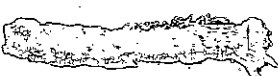
**Factual Objection**

1. Pertains to the petitioner record.
2. Pertains to the petitioner record.
3. Correct to the extent that 33% quota is fixed for promotion from class-IV to junior clerk. The remaining para is incorrect. The appellant is at serial No. 40 at the seniority list of class-IV employees and will be considered for promotion on his own turn.
4. Incorrect no departmental appeal filed by the Appellant and diary No. on the departmental appeal is of the letter received from SDEO.(copy of the diary record is Annexure-C)

Grounds:

- A. Incorrect. The appellant is at S.No.40 at the seniority list of class-IV and will be considered for promotion on his own turn.(copy of seniority list is Annexure-A)
- B. Incorrect. The appellant is at SNo.40 of the seniority list. He has to wait for his turn as already lots of Civil Servants/Officials are senior to him.
- C. Incorrect. As explained above.
- D. Incorrect. An inquiry was constituted by the Director (E&SE), the inquiry officer made some recommendations regarding those officials who do not deserve and got promotion to Junior Clerk and also all those officials who mislead the Court and get illegal & without turn promotion will be proceeded against as Departmental action is taken against them. In the light of the recommendations of the inquiry report (Annexure-B).
- E. Pertains to the record however detail reply has already been given in Para-A.
- F. Incorrect.
- G. The Respondents also seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore, requested before your honor that the present appeal is illegal, against facts and without force, may kindly be dismissed with cost.



Secretary (E&SE) Department,  
Govt: of KPK.

Respondent No.1&2

District Education Officer (M)  
Nowshera

Respondent No.3

Secretary Finance Department,  
Govt: of KPK.

3

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR**

Appeal No 1593/2013

Jan Alam.....Appellant

VERSUS

1- Director (E & S) Education Khyber Pakhtunkhwa, Peshawar & others.

.....  
Respondents

**AFFIDAVITE**

I Inam Khan (Toru) District Education Officer (M) Nowshera do solemnly affirmed and declare on oath that the contents of Par wise comments/ reply on behalf of respondent are true and correct to the best of my knowledge and nothing has been concealed from this Honourable Tribunal.



Deponent

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) ELEMENTARY & SECONDARY EDUCATION, NOWSHERA

Tentative Seniority List of Class-IV OF Ele: & Secy: Education, Nowshera

S #	Name of Class-IV	Father's Name	Designation	Dimicil e	Name of School	Qualificatio n	Date of Birth	Date of 1st Apptt: in Edu: Deptt:	Date of taking over charge	Date of taking over charge in this Distt:	Mobile #
1	Gohar Ali Shah	Maraham Shah	N/Q	NSR	GMS, Wali	S.S.C	29/02/1956	09/01/1975	09/01/1975	09/01/1975	0344-9140684
2	Bakht Ali	Khan Zaman	Lab: Attend	NSR	GHS, Khesghi Bala	S.S.C	03/01/1957	21/09/1981	21/09/1981	21/09/1981	0923-640121
3	Rahat Shah	Bakhari Shah	Lab: Attend	NSR	GHSS, Akbar Pura	S.S.C	14/09/1966	15/09/1984	15/09/1984	15/09/1984	0307-7120151
4	Jan Khan	Gulab	N/Q	NSR	GHS, Khesghi Bala	S.S.C	10/04/1967	16/09/1985	16/09/1985	16/09/1985	0923-640121
5	Munawar Shah	Rasool Shah	Chowkidar	NSR	GHS, Aza Khel Bala	S.S.C	10/10/1961	02/05/1986	02/05/1986	02/05/1986	0342-3170313
6	Wilayat Khan	Khan Sharif	Chowkidar	NSR	GPS Mohib Banda	FA, PTC	08/05/1959	12/01/1987	12/01/1987	12/01/1987	0332-9011539
7	Akhter Munir	Adam Khan	Chowkidar	NSR	GPS Dag Behsud No2	S.S.C	17/04/1972	10/09/1987	10/09/1987	10/09/1987	
8	Mukhtaj ud Din	Lal Din	N/Q	NSR	GHS, Jarooba	S.S.C	15/05/1955	21/10/1987	21/10/1987	21/10/1987	0301-5092610
9	Iqbal Husain	Malang Khan	Chowkidar	NSR	GPS Gul Rehan	S.S.C	04/01/1967	29/10/1987	29/10/1987	29/10/1987	
10	Khalid Khan	Hassan Khan	Chowkidar	NSR	GHSS, Nizampur	S.S.C	01/01/1968	29/10/1987	29/10/1987	29/10/1987	
11	Taj Rahim	Abur Rahim	Chowkidar	NSR	GPS, Kund	S.S.C	02/01/1958	07/01/1988	07/01/1988	07/01/1988	
12	Nazir Ahmad	Abdur Raziq	Chowkidar	NSR	GPS, No.1 Akora	S.S.C	14/09/1969	26/01/1988	26/01/1988	26/01/1988	
13	Amreesh Khan	Muhammad Amin	Lab: Attend	NSR	GHS, Mughalkai	S.S.C	10/02/1966	14/02/1988	14/02/1988	14/02/1988	0333-9049839
14	Fida Muhammad	Feroz Khan	N/Q	NSR	GHS, Spin Khak	S.S.C	13/12/1970	01/06/1988	01/06/1988	01/06/1988	0300-5376656
15	Rang Wali Shah	Abdul Ghafoor Shah	Chowkidar	NSR	GPS.1 Azakhel Payan	S.S.C	03/12/1967	11/06/1988	11/06/1988	11/06/1988	0334-9900251
16	Saeed Ullah	Mohabat Shah	Chowkidar	NSR	GPS.2 Pabi	S.S.C	04/10/1965	21/09/1988	22/09/1988	22/09/1988	0300-5895620
17	Niaz Muhammad	Qader Shah	Chowkidar	NSR	GPS Dag Behsud No1	S.S.C	10/10/1970	27/09/1988	27/09/1988	27/09/1988	0333-9261461
18	Farzand Ali	Noor Bad shah	Chowkidar	NSR	GPS, No:1 Mulla Killi	S.S.C	04/03/1968	04/11/1988	04/11/1988	04/11/1988	
19	Ihsan Ul Haq	Fazli Rahman	Chowkidar	NSR	GPS, Sherin Koty	S.S.C	10/01/1961	30/10/1989	11/01/1989	11/01/1989	
20	Hamid Afzal	Sher Afzal	Behishti	NSR	GHS, No.2 Pir Pai	S.S.C	02/04/1971	07/09/1989	07/09/1989	07/09/1989	0300-9239507
21	Muhammad Ismail	Sher Bahadar	Lab: Attend	Chard	GHS, Aman Garh	S.S.C	14/05/1964	09/09/1989	09/09/1989	09/09/1989	0300-9367253
22	Mehrab Gul	Ziarat Gul	N/Q	NSR	GHS, Badrashi	S.S.C	01/04/1972	11/10/1989	11/10/1989	11/10/1989	0331-4326943
23	Mir Haider	Sadbar Gul	Chowkidar	NSR	GPS Ashakhel	S.S.C	12/09/1973	20/12/1989	20/12/1989	20/12/1989	0301-3011694
24	Haider Khan	Muzamil Shah	Chowkidar	NSR	GPS No1 Cantt	S.S.C	14/08/1969	05/02/1990	05/02/1990	05/02/1990	
25	Faszal Ahmad Shah	Mazroob Shah	Chowkidar	NSR	GPS Gul Rehan	S.S.C	02/04/1959	11/04/1990	11/05/1990	11/05/1990	
26	Syed Zahir Shah	Sayed Usman Shah	N/Q	NSR	GHS, Taru Jabba	F.A	02/11/1972	01/07/1990	01/07/1990	01/07/1990	0333-9045825
27	Sanam Gul	Farid Gul	Lab: Attend	NSR	GHS, Mali Khet Bala	M.A / B.Ed	05/03/1969	15/10/1990	15/10/1990	15/10/1990	
28	Ali Muhammad	Saeed Said	Chowkidar	NSR	GPS, Sees Mandi	S.S.C	14/06/1970	20/11/1990	20/11/1990	20/11/1990	
29	Mir Azam Khan	Saeedullah Khan	N/Q	NSR	GMS, Hisar Tang	S.S.C	06/11/1969	01/01/1991	01/01/1991	01/01/1991	0345-9868120
30	Noor ul Islam	Muhamma Ishaq	Chowkidar	NSR	GPS, sheikh Ahmad Baba	S.S.C	20/03/1970	18/01/1991	18/01/1991	18/01/1991	
31	Aziz ul Akbar	Sadiq Akbar	Chowkidar	NSR	GPS, Darwazgai	F.A	25/11/1961	02/02/1991	02/02/1991	02/02/1991	
32	Tufail	Pervaz	Sweeper	NSR	EDO(E & SE) Nowshera	S.S.C	06/11/1974	08/05/1991	08/05/1991	08/05/1991	
33	Ibrahim Khan	Rehman Gul	Chowkidar	NSR	GPS Kander	S.S.C	04/04/1976	16/05/1991	16/05/1991	16/05/1991	

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S #	Name of Class-IV	Father's Name	Designation	Dimicil e	Name of School	Qualificatio n	Date of Birth	Date of 1st Apptt: in Edu: Deptt:	Date of taking over charge	Date of taking over charge in this Distt:	Mobile #
34	Muhammad Ibrahim	Rehman Gul	Chowkidr	Chd	GPS, Kandar	S.S.C		16/05/1991	16/05/1991	16/05/1991	
35	Riaz Amin	Hazrat Umar	Chowkidar	NSR	GPS A C Center	S.S.C	19/05/1997	18/05/1991	18/05/1991	18/05/1991	
36	Muhammad Tariq	Abdur Rauf	Chowkidar	NSR	GPS, Risal garh	F.A	10/06/1956	01/10/1991	01/10/1991	01/10/1991	
37	Zafar Iqbal	Musharaf Khan	Lab: Attend	NSR	GHS, Dag Behsud	S.S.C	06/01/1975	21/10/1991	21/10/1991	21/10/1991	0312-5771794
38	Mushtaq Khan	Abdul Ghaffar	Mali	NSR	GHS, Aman Garh	S.S.C	21/09/1962	13/11/1991	13/11/1991	13/11/1991	
39	Nosherawan Khan	Sher Afzal	Lab: Attend	NSR	GHSS, Jallozai	F.A	03/10/1970	07/01/1992	07/01/1992	07/01/1992	0331-4704922
40	Jan Alam	Fazli Elahi	Sweeper	Chd	GHS, Mulla Killi	F.A	15/03/1964	01/06/1992	01/06/1992	01/06/1992	0345-9087327
41	Fida Muhammad	Tayyeb ur Rahman	Sweeper	Chard	GHS, Khesghi Bala	B.A / C.T	16/06/1961	23/09/1992	23/09/1992	23/09/1992	0923-640121
42	Abdur Rahman	Raza Khan	Sweeper	Chd	GHSS, Khesghi Payan	B.A	09/10/1975	20/10/1992	20/10/1992	20/10/1992	
43	Raees Khan	Fareed Khan	N/Q	Chard	GHS, Khesghi Bala	S.S.C	05/03/1975	15/11/1992	15/11/1992	15/11/1992	0923-640121
44	Khial Nawab	Khanadin	Chowkidar	NSR	GHS, Phari Katti Khel	S.S.C	16/01/1971	01/01/1993	01/01/1993	01/01/1993	
45	Falak Naz	Musharaf Khan	Mali		GHS, Tarkha	S.S.C	01/04/1966	18/04/1993	18/04/1993	18/04/1993	0315-9208925
46	Muhammad Ajmal	Luqman din	Behishti	NSR	GHS, No.1 Shaidu	S.S.C	12/05/1972	29/09/1993	29/09/1993	29/09/1993	
47	Khalid Khan	Aseem Khan	Behishti	Swabi	GHS, Adamzai	S.S.C	10/06/1967	03/10/1993	03/10/1993	03/10/1993	0346-9545717
48	Nadeem Akhtar	Ali Akbar	N/Q	NSR	GCMHS, Akora Khattak	S.S.C	01/05/1970	05/10/1993	05/10/1993	05/10/1993	0336-9432128
49	Inam Ullah	Faqir Muhammad	N/Q	Pesh	GMS, Chowki Mamrez	S.S.C	02/01/1977	19/10/1993	19/10/1993	19/10/1993	0313-9709463
50	Walayat Khan	Zarbat Khan	N/Q	NSR	GMS, Spin Kana Kalan	F.A	09/05/1969	20/10/1993	20/10/1993	20/10/1993	0305-9728919
51	Muzamel Khan	Zulkifel	N/Q	NSR	GHS, Tarkha	S.S.C	25/12/1971	14/05/1994	14/05/1994	14/05/1994	0344-5904144
52	Muhammad Shabir	Usra Khan	Chowkidar	NSR	GPS, Shaheen Abad	S.S.C	10/11/1975	31/08/1994	31/08/1994	31/08/1994	
53	Shahma Gul	Samin Gul	Chowkidar	NSR	GPS, Rokhan abad	F.A	03/03/1970	11/01/1995	11/01/1995	11/01/1995	
54	Taila Muhammad	Ghulam Haider	Chowkidar	NSR	GPS, Duran abad	S.S.C	02/01/1952	11/01/1995	11/05/1995	11/01/1995	
55	Abdul Hanan	Shamran Khan	N/Q	NSR	GMS, Kana Khel	S.S.C	01/01/1975	01/02/1995	01/02/1995	01/02/1995	0347-9014601
56	Awal Khan	Khan Said	Chowkidar	NSR	GPS No 2 Shaikhi	S.S.C	20/10/1976	11/06/1995	11/07/1995	11/07/1995	
57	Saeedur Rahman	Habibul Rahman	Behishti	NSR	GHS, Zakhi Qabristan	S.S.C	13/04/1977	01/09/1995	01/09/1995	01/09/1995	0301-8833859
58	Shabir ud Din	Lal Din	Chowkidar	NSR	GPS, Namdar khel	S.S.C	01/07/1970	10/10/1995	10/10/1995	10/10/1995	
59	Khurshid Zada	Khan Zada	Lab: Attend	NSR	GHS, Kahi	S.S.C	02/02/1976	01/01/1996	01/01/1996	01/01/1996	0302-3514508
60	Sher Badshah	Mir Badshah	Chowkidar	NSR	GPS, Chashmai	S.S.C	24/02/1963	30/04/1996	30/04/1996	30/04/1996	0334-8952877
61	Gul Faraz	Maiva Gul	Chowkidar	NSR	GPS Mairaji Payan	S.S.C	17/12/1978	10/10/1996	17/10/1996	17/10/1996	
62	Amir Gul	Habib Gul	Khakroob	NSR	GHS, No.1 Shaidu	S.S.C	07/08/1974	12/11/1996	12/11/1996	12/11/1996	
63	Javid Khan	Hameedul Ghafoor	Sweeper	NSR	GMS, Islamabad	F.A	20/04/1972	23/06/1997	23/06/1997	23/06/1997	0332-9018246
64	Wajid Khan	Abdul Rahman	Chowkidar		GHS, Tarkha	S.S.C	04/09/1974	25/06/1997	25/06/1997	25/06/1997	0303-5886412
65	Abas Khan	Muhammad Yousaf	N/Q	Mrd	GMS, A. SC Colony	S.S.C	13/03/1978	23/09/1997	23/09/1997	23/09/1997	0343-9874665
66	Ibrahim Khan	Hameed Khan	Lab: Attend	NSR	GHSS, Khesghi Payan	M.A	03/01/1971	02/05/1998	02/05/1998	02/05/1998	

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67	Muhammad Asif	Ghulam Muhammad	Lab: Attend	NSR	GHSS, Khesghi Payan	F.A	08/05/1973	02/05/1998	02/05/1998	02/05/1998	
68	Khan Muhammad	Mian Khan	Chowkidar	NSR	GHS, Adamzai	S.S.C	09/11/1967	01/10/1998	01/10/1998	01/10/1998	0321-9898010
69	Bahar Ali	Gohar Ali	Chowkidar	NSR	GPS, Rashakai	S.S.C	03/04/1979	16/10/1998	17/10/1998	17/10/1998	
70	Abid Muhammad	Fazal Muhammad	N/Q	NSR	GHSS, Khesghi Payan	F.A	02/03/1972	28/10/1998	28/10/1998	28/10/1998	
71	Hamid Ali	Janas Khan	Mali	NSR	GHS, Rashakai	S.S.C	15/11/1979	08/12/1998	08/12/1998	08/12/1998	0300-5714732
72	Ashraf Ali	Khidmat Ali	Khakrob	NSR	GHS, L.C Aman Garh	S.S.C	01/03/1969	17/12/1998	17/12/1998	17/12/1998	0345-9307385
73	Anwar Khan	Muh. Ilyas Khan	Chowkidar	NSR	GHS, Dag Behsud	S.S.C	03/03/1970	26/12/1998	26/12/1998	26/12/1998	0315-9706477
74	Muhammad Ayaz	Muhammad Sharif	Lab: Attend	NSR	GHSS, Khesghi Payan	M.A	31/03/1971	31/12/1998	31/12/1998	31/12/1998	
75	Shoukat Ali	Gul Rehman	Lab: Attend	NSR	GHS, Samandar Ghari	F.Sc.	30/12/1972	14/01/1999	14/01/1999	14/01/1999	0333-9003731
76	Faqir Taj	Mahabat Khan	Lab: Attend	NSR	GMS, Misri Banda	F.A	25/07/1973	01/02/1999	01/02/1999	01/02/1999	0333-9023188
77	Sher Dil Khan	Ashraf Khan	Lab: Attend	NSR	GHSS, Khairabad	S.S.C	03/10/1971	19/02/1999	19/02/1999	19/02/1999	0333-9325977
78	Fazli Rabi	Noor Zada	Lab: Attend	NSR	GHSS, Khairabad	S.S.C	15/07/1973	19/02/1999	19/02/1999	19/02/1999	0333-9039912
79	Zulfiqar	Inran Gul	N/Q	NSR	GHSS, Khairabad	S.S.C	22/12/1974	19/02/1999	19/02/1999	19/02/1999	0333-9012979
80	Shah Nawaz	Shah Zaman	Lab: Attend	NSR	GHSS, Khairabad	M.A	10/11/1977	19/02/1999	19/02/1999	19/02/1999	0333-9040109
81	Rabi Ullah	Zanian Khan	Sweepèr	NSR	GMS, Aza Khel Bala	S.S.C	08/01/1972	01/03/1999	01/03/1999	01/03/1999	0346-5670879
82	Muhammad Jehanzeb	Khwaja Iltaf Hussain	Lab: Attend	NSR	GHSS, Manki Sharif	F.A	11/09/1967	11/03/1999	11/03/1999	11/03/1999	0333-9188357
83	Zahoor Hussain	Mir Liassan	N/Q	NSR	GHS, Mohib Banda	S.S.C	02/01/1961	17/04/1999	17/04/1999	17/04/1999	0334-9113431
84	Muhammad Zafar	Muhammad Nisar	Lab: Attend	NSR	GHS, Baghban Pura	S.S.C	10/04/1974	23/04/1999	23/04/1999	23/04/1999	0333-9027484
85	Ismail shahid	Israr ud din	Chowkidar	NSR	GPS, No:2 Bara Banda	B.A	02/05/1979	30/12/1999	30/12/1999	30/12/1999	
86	Akbar Hayat	Hidayat Ullah	Chowkidar	NSR	GPS, No: I Risal Pur	S.S.C	03/04/1976	31/12/1999	31/12/1999	31/12/1999	
87	Ikram ud Din	Rahman ud Din	Khakroob	NSR	GHS, No.1 Shaidu	B.A / JDPE	12/12/1978	08/01/2000	08/01/2000	08/01/2000	
88	Noor Zada	Sahib Zada	N/Q	NSR	GHS, No.1 Shaidu	S.S.C	23/09/1977	30/06/2000	30/06/2000	30/06/2000	
89	Haroon ur Rasheed	Nisar Ahmad	Lab: Attend	NSR	GHSS, Manki Sharif	S.S.C	24/04/1970	01/07/2000	01/07/2000	01/07/2000	0332-4544325
90	Qasim shah	Sharif ud din	Chowkidar	NSR	GPS, No2 Mulla Killi	F.A	13/04/1983	05/03/2001	05/03/2001	05/03/2001	
91	Asad ali	Noor Muhammad	Chowkidar	NSR	GPS, Suhbat Korrana	S.S.C	02/05/1983	25/04/2001	25/04/2001	25/04/2001	
92	Zia ur Rahman	Gul Mast	Chowkidar	NSR	GHS, Rashakai	S.S.C	24/05/1983	31/05/2001	31/05/2001	31/05/2001	0300-5775859
93	Naveed Khan	Liagat Ali	Behishti	NSR	GHS, Banda Sheikh Ismail	S.S.C	25/03/1983	01/12/2002	01/12/2002	01/12/2002	0302-2383815
94	Shabir ahmad	Sharif ud din	Chowkidar	NSR	GPS, No2 Mulla Killi	B.A	15/03/1988	23/09/2003	23/09/2003	23/09/2003	
95	Abdul Khaliq	Abdul Malik	Behishti	Chard	GHS, Aman Garh	S.S.C	24/03/1959	07/01/1981	01/01/2004	01/01/2004	0315-9594713
96	Zafar Ali Khan	Guldar Khan	Chowkidar	NSR	GHS, Mughalkai	S.S.C	01/04/1980	01/03/2004	01/03/2004	01/03/2004	0334-9434569
97	Ihsanul Haq	Irfaul Haq	Behishti	NSR	GHS, No.1 Nowshera Cantt.	M.A	15/04/1986	30/04/2004	30/04/2004	30/04/2004	0313-5770919
98	Gul Zada	Khan Zada	Chowkidar	NSR	GPS Khaisri	S.S.C	01/03/1982	11/11/2004	22/11/2004	22/11/2004	
99	Akbar Hussain	Fazal Akbar	Chowkidar	NSR	GPS Pushtoon Ghari	S.S.C	02/02/1977	22/11/2004	23/11/2004	23/11/2004	0336-8664830

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100	Mujahid ali	Tila Muhammad	Chowkidar	NSR	GPS, Sherin Koty	S.S.C	02/05/1986	13/05/2005	13/05/2005	13/05/2005	
101	Muhammad Kamran	Rahim Ullah	Chowkidar	NSR	GPS, Riahim Ullah Koroona	S.S.C	17/02/1979	06/01/2006	06/01/2006	06/01/2006	
102	Adnan ali	Liaqat ali	Chowkidar	NSR	GPS, No2 Risal Pur	S.S.C	16/06/1988	11/01/2006	11/01/2006	11/01/2006	
103	Bahar Ali	Taj Muhammad	N/Q	Swabi	GHS, Jehangira Road	M.A	06/03/1987	07/02/2005	07/02/2006	07/02/2006	33290154
104	Iftihar Ali Shah	Muhammad Nabi	Chowkidar	NSR	GPS No3 ZKKS	S.S.C	04/10/1982	21/09/2006	10/02/2006	10/02/2006	
105	Maqsood Ahmad	Safdar Khan	Chowkidar	NSR	GPS, Marhatti Banda	S.S.C	05/02/1986	23/02/2006	23/02/2006	23/02/2006	
106	Pervaz Khan	Muhammad Ali Khan	L/Att	NSR	GHS, Mian Issa	S.S.C	04/03/1976	21/09/2006	21/09/2006	10/03/2006	
107	Raees Khan	Shamas Khan	Chowkidar	NSR	GHS, Mian Issa	S.S.C	03/12/1976	21/09/2006	10/04/2006	10/04/2006	
108	Sayed shahid Iqbal	Syed Ghani shah	Chowkidar	NSR	GPS, No:1 Kuttar Pan	B.A	02/03/1982	03/07/2006	03/07/2006	03/07/2006	
109	Shamshad Khan	Sardaraz Khan	Chowkidar	NSR	GHS, Afrido Killi	S.S.C	11/02/1962	21/09/2006	21/09/2006	21/09/2006	333900127
110	Nabi Amin	Rooh Ul Amin	Chowkidar	NSR	GPS, No2 Kuttar Pan	S.S.C	04/12/1988	21/09/2006	21/09/2006	21/09/2006	
111	Muhammad Shoaib	Muhammad Amin	Chowkidar	NSR	GPS, Bara Banda	F.A	02/02/1985	29/09/2006	29/09/2006	30/09/2006	
112	Islam Jan	AbdUllah Jan	N/Q	NSR	GHSS, Z.K.Ksahib	S.S.C	01/05/1973	05/12/2006	05/12/2006	05/12/2006	346566258
113	Safi Ullah shah	Mubarak Shah	Chowkidar	NSR	GPS, Sherin Koty	S.S.C	03/02/1989	04/05/2007	04/05/2007	04/05/2007	
114	Wajid Ali	Sabz Ali	Chowkidar	NSR	GPS, Zando Banda	B.A / B.L.S	01/04/1986	23/05/2007	23/05/2007	23/05/2007	346262372
115	Sher Azam	Abdul Azam	W. Attend	Chitral	GHS, No.1 Nowshera Cantt:	S.S.C	30/03/1990	15/07/2008	15/07/2008	15/07/2008	346814470
116	Aftab Muhammad	Muslim Muhammad	Chowkidar	NSR	GPS Zakhi Qabristan	SSC	18/01/1984	30/09/2009	10/01/2009	10/01/2009	334923575
117	Kifayat Khan	Nasim Khan	Sweeper	NSR	GMS, Chashmai	SSC	01/12/1964	30/09/2009	01/10/2009	10/01/2009	334892158
118	Shehzad Khan	Niaz Parwar Khan	Chowkidar	NSR	GPS Khansher Ghari	FA	03/12/1983	10/03/2009	10/04/2009	10/04/2009	333925905
119	Nasrullah Khan	Zarien Khan	Sweeper	NSR	EDO(E & SE) Nowshera	SSC	04/05/1974	10/05/2009	10/05/2009	10/05/2009	
120	Naeem Gul	Harif Gul	Behishti	NSR	GMS, Narri	S.S.C	15/01/1979	10/05/2009	10/05/2009	10/05/2009	3329002431
121	Syed Jamal Shah	Syed Bukhari Shah	Behishti	NSR	GMS, Kana Khel	S.S.C	02/02/1979	05/10/2009	10/06/2009	10/06/2009	3469080014
122	Shoukat Hussain	Aman Ullah	Behishti	NSR	GHS, Inzari	S.S.C	31/12/1984	15/07/2009	15/07/2009	15/07/2009	3075708837
123	Saddam Hussain	Mumtaz Hussain	Chowkidar	NSR	GPS.2 Khudrizi	FA, PTC	01/01/1990	15/07/2009	15/07/2009	15/07/2009	3005312090
124	Shahid Khan	Tasleem Khan	N/Q	NSR	GHSS, Khesghi Payan	S.S.C	04/03/1976	18/07/2009	18/07/2009	18/07/2009	
125	Muhammad Riaz	Muhammad Saeed	Sweeper	NSR	GMS, Narri	M.A	03/02/1970	21/07/2009	21/07/2009	21/07/2009	3128036135
126	Arshad Ali	Sherzada	Chowkidar	NSR	GPS, Bar a Bnda No:1	B.A	01/01/1979	21/07/2009	21/07/2009	21/07/2009	
127	Shaukat Ali	Shishti Gul	Chowkidar	NSR	GPS.1 Akberpura	FA, DPED	04/10/1981	21/07/2009	25/07/2009	25/07/2009	3005933399
128	Muhammad Ibrar Khar	Hawaladar Khan	Mali	NSR	GHS, Taru Jabba	SSC	22/03/1967	25/07/2009	25/07/2009	25/07/2009	
129	Anwar Khan	Mir Rehman	Mali	NSR	GHSS, Akbar Pura	S.S.C	09/04/1971	25/07/2009	25/07/2009	25/07/2009	3025777413
130	Muhammad Junaid	Muhammad Shah	Behishti	NSR	GHS, Dak Ismail Khel	S.S.C	15/03/1984	28/07/2009	28/07/2009	28/07/2009	
131	Muhammad Tufail	Muhammad Nishat	Lab: Attend	NSR	GHS, Badrashhi	S.S.C	04/04/1975	29/07/2009	29/07/2009	29/07/2009	3126369055
132	Shan Zeb	Safarash Khan	Chowkidar	NSR	GHS, Badrashhi	S.S.C	03/04/1976	29/07/2009	29/07/2009	29/07/2009	3314268726

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) ELEMENTARY & SECONDARY EDUCATION, NOWSHERA (2)


Tentative Seniority List of Class-IV OF Ele: & Secy: Education, Nowshera

S #	Name of Class-IV	Father's Name	Designation	Dimicil e	Name of School	Qualificatio n	Date of Birth	Date of 1st Apptt: in Edu: Deptt:	Date of taking over charge	Date of taking over charge in this Distt:	Mobile #
133	Hamid Khan	Shakeel Ahmad	Lab:attended	NSR	GHS, Dheri Katti Khel	SSC	24/02/1984	30/07/2009	30/07/2009	30/07/2009	
134	Zakir Rehman	Shasur Rahman	Lab: Attend	NSR	GHS, Manahai	S.S.C	10/04/1991	30/07/2009	30/07/2009	30/07/2009	3339869
135	Abrar Ali	Bahar Ali	N/Q	NSR	GMS, Kotar Pan	S.S.C	18/04/1986	10/08/2009	10/08/2009	10/08/2009	3005910
136	Shahid Ali	Habibul Ghafoor	N/Q	NSR	GMS, Islamabad	B.A	28/05/1983	11/08/2009	11/08/2009	11/08/2009	923923
137	Muhammad Shafee	Kifayat Ullah	Mali	NSR	GHS, Pir Sabaq	S.S.C	07/06/1981	12/08/2009	12/08/2009	12/08/2009	3026326
138	Hazrat Nooh	Khan Wada	Sweeper	NSR	GHS, Jarooba	S.S.C	03/08/1976	18/08/2009	18/08/2009	18/08/2009	
139	Gul Said	Muhammad shah	Chowkidar	NSR	GPS, Gandary Payan	SSC	10/05/1972	19/08/2009	19/08/2009	19/08/2009	
140	Irfan Ullah	Mir Bahadar	Chowkidar	NSR	GPS, Banda Chill	SSC	24/11/1979	20/08/2009	20/08/2009	21/08/2009	
141	Saif Ali Khn	Sher Baz Khan	Sweeper	NSR	GPS, No.1 Shaidu	SSC	24/11/1976	22/08/2009	22/08/2009	22/08/2009	3015946
142	Musa Khan	Nasrullah Khan	Chowkidar	NSR	GPS,2 Babi Jadeed	SSC	05/06/1974	17/09/2009	17/09/2009	17/09/2009	303835
143	M. Rashid Azeem	Molvi M. Ibrahim	Chowkidar	NSR	Zakhi Charbagh	FA	30/03/1979	19/09/2009	20/09/2009	20/09/2009	
144	Muhammad Waheed	Muhammaad Saeed	Chowkidar	NSR	GPS, Eid Gah	S.S.C	06/02/1972	06/10/2009	06/10/2009	06/10/2009	
145	Shahzad	Murad Khan	Chowkidar	NSR	GHS, Bara Banda	SSC	06/08/1991	06/10/2009	06/10/2009	06/10/2009	
146	Sajjad Ali	Haleem Gul	Chowkidar	NSR	GPS Zakhi Miana	SSC, PTC	13/01/1972	09/05/2009	09/12/2009	09/12/2009	303774
147	Naveed Ullah	Ghufran Ullah	Lab: Attend	NSR	GPS Gandary Payan	S.S.C	04/07/1992	10/01/2010	10/01/2010	10/01/2010	3239320
148	Abrar Ahmad Shah	Sayed Mohib Shah	Lab: Attend	NSR	GHSS, Risalpur	F.A, PTC	03/03/1981	14/01/2010	14/01/2010	14/01/2010	3009072
149	Aayaz Muhammad	Pir Muhammad	Chowkidar	NSR	GPS, Bara Banda Nol	F.A	03/01/1977	23/01/2010	23/01/2010	23/01/2010	
150	Hawal Shah	Alam Shah	Chowkidar	NSR	GGPS, Tootki	S.S.C	10/06/1975	03/03/2010	03/03/2010	03/03/2010	3005356
151	Khan Muhammad	Janab Gul	N/Q	NSR	GHS, Jabbi	SSC	01/01/1965	04/03/2010	04/03/2010	04/03/2010	
152	Muhammad Shoaib	Fazal Amin	Behishti	NSR	GHS, Jabbi	S.S.C	15/12/1970	04/03/2010	04/03/2010	04/03/2010	3068786
153	Kashif Khan	Shahin Shah	Chowkidar	NSR	GPS Palosi Payan	FA	20/12/1991	28/05/2010	06/03/2010	06/03/2010	
154	Niamat Ullah	Abdul Wakil	N/Q	NSR	GHS, Pashtoon Garhi	S.S.C	04/12/1975	15/03/2010	15/03/2010	15/03/2010	3348927
155	Munawar Din	Roshan Din	Chowkidar	NSR	GHSS, Nizampur	S.S.C	01/03/1963	16/03/2010	16/03/2010	16/03/2010	
156	Kalim ur Rehamn	Bad Shah Gul	L/Att	NSR	GHS, No.1 Shaidu	SSC	18/03/1974	16/03/2010	16/03/2010	16/03/2010	
157	Mir Baz Khan	Khan Bahadar	Chowkidar	NSR	GHS, Dagi Banda	SSC	10/03/1978	02/04/2010	02/04/2010	02/04/2010	
158	Aman Ullah	Hamid Ullah	Chowkidar	NSR	GPS Hamid Abad	SSC	20/04/1988	15/11/2010	15/11/2010	16/04/2010	3005875
159	Farzand Ali	Zafer Ali	Chowkidar	NSR	GPS Jallozai No2	SSC	22/02/1977	14/04/2010	17/04/2010	17/04/2010	
160	Mushtaq Ahmad	Noor Ahmad	C-IV		GMS, Shawangi	S.S.C		20/04/2010	20/04/2010	20/04/2010	
161	Shahzad Khan	Haidar Ali	Chowkidar	NSR	GPS, Bara Bnda Nol	SSC	01/05/1983	19/05/2010	19/05/2010	19/05/2010	
162	Taj Ali	Muhammad Ali Khan	Chowkidar	NSR	GPS, Gandary Bala	SSC	04/03/1979	24/05/2010	24/05/2010	24/05/2010	
163	Bilal Nasir	Sher Shah	Chowkidar	NSR	GPS, Aba Khel	F.A	23/12/1991	29/05/2010	29/05/2010	29/05/2010	
164	Asad Khattak	Dur Muhammad	W. Attend	NSR	GHSS, Nizampur	S.S.C	06/09/1988	01/06/2010	01/06/2010	01/06/2010	
165	Fasih ur Rahman	Raz Ali Shah	Chowkidar	NSR	GPS, Nihal Pura	S.S.C	15/11/1990	01/06/2010	01/06/2010	01/06/2010	



Tentative Seniority List of Class-IV OF Ele: & Secy: Education, Nowshera

S #	Name of Class-IV	Father's Name	Designation	Dimicil e	Name of School	Qualificatio n	Date of Birth	Date of 1st Apptt: in Edu: Deptt:	Date of taking over charge	Date of taking over charge in this Distt:	Mobile #
166	Kaleem Ullah	Siraj Muhammad	Sweeper	NSR	GCMHS, Akora Khattak	S.S.C	13/07/1991	04/06/2010	04/06/2010	04/06/2010	312984835
167	Zubair	Shah Muhammad	Chowkidar	NSR	GPS, Suhbat Korrana	SSC	18/01/1980	22/06/2010	24/06/2010	24/06/2010	
168	Imran ud Din	Fayaz ud Din	Sweeper	NSR	GHSS, Z.K.Ksahib	F.A	15/02/1990	24/06/2010	24/06/2010	24/06/2010	344451153
169	Sabzar Khan	Sardar Muhammad	Chowkidar	NSR	GPS, Ouch Khwar	S.S.C	05/03/1979	25/06/2010	25/06/2010	25/06/2010	346957137
170	Iftikhar Khan	Jabbar Khan	Chowkidar	NSR	GPS, Issori Payan	B.A	12/02/1981	25/06/2010	25/06/2010	25/06/2010	
171	Shabir Ahmad	Abdul Nawaz	Chowkidar	NSR	GPS, Hassan Dara	S.S.C	05/05/1974	29/06/2010	29/06/2010	29/06/2010	301876857
172	Syed Tayyeb Ali shah	Syed Haleem Shah	Chowkidar	NSR	GPS, Spino Killi	B.A	28/01/1993	30/09/2009	30/09/2009	10/07/2010	
173	Raza Khan	Said Nazeer	Chowkidar		GHS, No2 Shaidu	F.Sc	05/07/1986	26/02/2010	26/02/2010	03/08/2010	346567024
174	Sufaid Khan	Muhammad Zaman	Lab: Attend		GHS, Tarkha	B.A	03/08/1985	01/01/2011	01/01/2011	01/01/2011	307807483
175	Arshad Aman	Bhai Khan	Sweeper	NSR	GHS, Watter	S.S.C	10/01/1985	28/02/2011	28/02/2011	28/02/2011	343954865
176	Hidayat Shah	Bahader Shah	Chowkidar	NSR	GPS Dag Behsud No5	SSC	20/08/1988	10/01/2012	10/01/2012	10/01/2012	
177	Nasir Khan	Noor Muhammad	Chowkidar	NSR	GPS.3 Ali Baig	SSC	01/12/1985	17/01/2012	18/01/2012	18/01/2012	333904986
178	Arshid Khan	Kamal Khan	Chowkidar	NSR	GPS Lakari	SSC	08/01/1978	19/01/2012	19/01/2012	19/01/2012	313923633
179	Zubair Khan		Lab: Attend		GHS, Khaisari	S.S.C		19/01/2012	19/01/2012	19/01/2012	
180	Rooh-Ullah	Mir Zaman		NSR	GMS, Kandi Taza Din	S.S.C	01/09/1979	26/01/2012	26/01/2012	26/01/2012	333919289
181	Khailid Dawood	Dawood Khan	Lab: Attend		GHS, No2 Shaidu	F.Sc	19/08/1988	30/01/2012	30/01/2012	30/01/2012	313935639
182	Khaer ul Bashar	Dilawar Khan	Sweeper	NSR	GMS, Aman Garh	D.A.E	19/09/1990	31/01/2012	31/01/2012	31/01/2012	332934342
183	Mustafa	Asalm Khan	Behishti	NSR	GHS, No.1 Shaidu	SSC	23/04/1972	08/02/2012	08/02/2012	08/02/2012	
184	Khan Niaz	Haroon Khan	Chowkidar	NSR	GHS, Khesghi Bala	S.S.C	05/10/1976	09/02/2012	09/02/2012	09/02/2012	92364012
185	Ijaz Ahmad	Nazir Muhammad	Chowkidar	NSR	GPS Kabul River	FA	01/12/1978	02/01/2012	18/02/2012	18/02/2012	
186	Mubarak Ali	Allah Bakhsh	Sweeper	NSR	GHS, No.1 Nowshera Cantt:	S.S.C	09/02/1967	01/03/2012	01/03/2012	01/03/2012	321952646
187	Mukarram Khan	Muh. Akram Khan	N/Q		GHS, No.1 Nowshera Cantt:	B.A	20/09/1973	02/07/2012	02/07/2012	02/07/2012	300571053
188	Ahmad Ali	Muhammad Tahir	Behishti	NSR	GHS, No.1 NSR Kalan	S.S.C	15/04/1988	07/08/2012	07/08/2012	07/08/2012	301562500

  
District Education  
officer (M) Nowshera

ADD B  
for mca 3/13/12/14  
13/12/14

Amira B  
of 4 (10)

### Inquiry Report

#### INTRODUCTION:

In compliance with notification No. 1718/Ad (Lit: II) Dated 21-08-2014 by AD (Lit-II) & No.2322-24 dated 11-7-2014 by The Dy. Director Establishment E&SE KP Peshawar, the undersigned visited the office of DEO E&SE (Male) and DEO E&SE (Female) Nowshehra on 10-09-2014, as an Inquiry Officer for facts finding against Ex-DEO (M) Nowshehra. And Imad-ud-Din.

It is worth mentioning to note that such kind of giving task/s to conduct an inquiry is something very serious and important. Please don't send such kind of appointment letters on routine normal dispatch system. Send them such tasks on TCS or OCS or registered AD in addition to message or calls on cell/s. I didn't receive my letter of inquiry dated in July and August till first week of September. Even the reminder was not sent to me and I was totally unaware of my duty. I think other channels block the delivery of such letters intentionally. I was informed on my cell in the first week of September. Then I rushed to Directorate to know the facts. I visited diary and dispatch office but was fruitless because letters on such dates were not traceable. When I got letters without annexures I requested for photocopies of related documents. I waited for hours to get the facts/annexures about the case. At last by involving the Deputy Director Establishment I was able to get the required copies. The persons were hesitated to make photocopies of related documents. I visited your good office but you were out of station on that day.

#### BACKGROUND:

Story: The Ex-EDO (M) Nowshehra Mr. Inhan-ud-Din appointed/his son Mr.Imad-ud-Din as Junior clerk against 33% quota policy under Notification Endst No: 4235-39 dated -01-10-2009 (Annex-1) after consultative meeting with DCO and recommendation of DSC.

In his letter No: 902 Dated 16-6-2014 sent to Director E&SE KP by the DEO Nowshera (M) he stated that Mr. Ima-ud-Din was appointed Class-IV and just after two months he was promoted to junior clerk out of 33% quota reserved for Class-IV employees completely ignoring all other class-IV employees who were senior to him, by his father Mr. Inhan-ud-Din who was Exective District Officer of male and Female at that time. Now Mr. Imad-ud-Din is working as Junior Clerk at GGHS Dheri Katti Khel, Nowshera as mentioned by DEO (F) in her letter No 1624 Dated 13-09-2014 addressed to the Inquiry Officer with attached documents (Annex-2). His case is in the service tribunal as his colleagues had challenged his promotion.

#### PROCEEDINGS:

The undersigned informed DEO (M) Nowshera on his cell few days before the visit about the purpose of Inquiry. Early in the morning on 10-9-2014 once again the undersigned asked

AD (Lit. II)  
26/11/10  
11/14

S. A. to Director E & S E  
Cyber Pakhtunkhwa to Peshawar  
S. No 1285F  
12/10/14



Presented

387  
13/10

DEO for green signal. He at 10.00 am told to come to office. At 10:10 am I left the office for Nowshera. When I reached the office, the DEO was busy in a meeting and the Deputy DEO (M) was out of office for an official work. After few hours the sitting DEO Mr. Inam sb came and I discussed the matter with him. Later on the Deputy DEO Mr. Sajjad Akhtar joined us and accompanied me to visit DEO (F) office, as Imad-ud- is/was on the Payroll of DEO (F) Nowshera.

Astonishingly the record was not available at the office of DEO (M). I asked from Superintendent Litigation & Establishment office but all of them were unable to provide record including the Diary and Dispatch Registers of that time. They repeated the story of destroying the record by floods. The concerned staff in private told me that nothing was done through proper channel and therefore they were unable to keep and provide proper record. Getting nothing from DEO (M) I proceeded to DEO (F) along with Deputy DEO (M) Mr. Sajjad Akhtar as the person (Imad-ud-Din) is/was on the payroll of DEO female.

Imad-ud-Din is working now at GGHS Dheri Katti Khel as junior clerk. I talked to Headmistress Ms. Nasim on her cell which was provided by DEO female. She was on duty at BISE Supplementary Examination at that time. Mr Imad-ud-Din was also not present on that day because of sick leave. I asked about the cell no of Imad-ud-Din. No one gave me his number at that time. I explained the situation to DEO female and she promised to send me the available record on post. The letter with attached documents was later on handed over to us by her clerk (Annex-2).

Mr Imad-ud-Din the Ex. EDO then talked to me on phone some three weeks before and promised to send the record on registered post. I also told him to send his own statement for clarification along with supporting documents. After one week he again talked me on my cell. I repeated the same task; he promised again and requested me to wait. I traced the number of Mr. Imad-ud-Din through his Headmistress and interviewed him on 10-10-2014, on phone. He last night left over the relevant document and in the morning on 11-10-2014 I received the documents (Annex-3)

#### **FINDINGS:**

From the documents provided by DEO female & Mr. Imad-ud-Din, interviews taken from Imad-ud-Din, staff members of DEO male and female, the undersigned found the following facts.

1. The Ex-EDO was the Executive Head of both male and female staff at the District before bifurcation and he adjusted his son at female school after giving him promotion.
2. According to Domicile Certificate he is the resident of District Nowshera.
3. The record upto July 2010 was severely damaged as mentioned & reported by different responsible persons and authorities (Annex-3 A).
4. From the copy of duplicate service book of Imad-ud-Din provided by DEO (F) Nowshera (Annex-3), it is clear that he was appointed as Naib Qasid on 25-05-2000 vide EDO

- Nowshera. Notification under Endst No. 22420-25 dated 25-05-2000 (copy of duplicate service book is attached as Annex-2&3) and was posted at GMS Sado Khel but according to Imad-ud-Din on phone, he performed his duty at EDO Nowshera till his promotion i.e. 01-10-2009. However the first notification/order of appointment is not available with Imad-ud-Din and office because of flood damages in July 2010, as stated by them. So validity of his service is doubtful but clear in the service book. The date of making duplicate service book is also not mentioned by District Officer, in his certificate attached on the top of copy of duplicate certificate (Annex-2&3)
5. Imad-ud-din was then promoted to Junior Clerk in BS-7 vide EDO Nowshera Notification under Endst. No: 4235-39 Dated 01-10-1009 and was posted at GGHS Dheri Katti Khel. He took over the charge there on the same day as mentioned in charge report (Annex-2,3 and 4)
  6. The service Tribunal decided in favour of applicants in its decision on 11-01-2011 as mentioned by DEO (M) in his letter No.902 Dated 16-06-2014 (Annex-1).
  7. The District Office (M & F) didn't provide any kind of record regarding maintenance of seniority list of class- IV. This made the whole process doubtful. Although he was given promotion against 33% quota policy based in BS-7, for class-IV keeping in view the seniority (which is not available now). God knows better.
  8. According to Imad-ud-Din he was given priority on the basis of his Diploma of Associate Engineer, which is equal to intermediate certificate. Who decided the case transparently? Is/was there any rule/policy or discretionary power of person or body of persons to decide in favour of candidate, which explain/s such kind of privilege or right etc. of any person? These are the questions which made the process of promotion cloudy. In an interview on phone he( The EX-EDO) denied such kind of favorable decision of promotion in favour of his son during his tenure. Here something went wrong. The benefit of holding Diploma is also mentioned in order of promotion (Annex-4):

#### RECOMMENDATIONS:

1. Keeping in view the loss of precious record due to torrential rains & flood/s, all the DEOs may be advised to prepare approved, agreed, undisputed seniority list/s of each cadre and a copy of those list/s to Directorate and update those list/s on Annual basis. They may be directed to upload such seniority list/s on their web sites and distribute hard copies to all stake holders, for ready reference. They may be made responsible to prepare and make the seniority list/s ready, especially for reserved seats under quota. This is the bone of contention, as our offices don't take care of such important activities on regular basis. Preparation and sharing of approved seniority list/s with all stake holders is important for smooth functioning of offices. In addition to these measures our offices should take an initiative to prepare the soft copy of all kind of record.

- (13) (119)
2. The concerned persons in Directorate should also be made responsible to update seniority list/s of BPS-17 and above on annual basis and upload the agreed/approved seniority list/s of each grade on web and share hard copies of those with all stake holders.
  3. In most of the Districts the responsible persons don't take care of keeping proper record especially of diary and dispatch. The cases are not moved on prescribed files due to which we face difficulty in tracing the record. Most of the offices don't maintain personal files. No one in any case takes the responsibility, in case of need. The offices maintain the files of those whose cases are moved for any kind of purpose, otherwise the situation in Districts is discouraging. They should strictly be directed to keep clear, proper, valid, reliable, verifiable & transparent record.
  4. The deprived persons may be asked to hand over any kind of proof or record or copy of seniority list pertaining to that time. It is missing.
  5. Because of non-availability of record, the concerned senior officers/officials may be asked to certify honestly the services of such persons. The DEO Nowshera may be asked to constitute a committee of senior officers and officials to rectify the services of their staff, if the record is not traceable. They would definitely know who are senior or junior to him (Imad-ud-Din) specially the beneficiary and deprived persons.
  6. If it is proved that others are senior to him ( I think it's true) then justice may be done to all others, who are senior to him keeping in view the approved updated rules by competent authority and not on precedents, likes, dislikes, favor and favoritisms.
  7. Notification of such vacant posts including vacant reserved seats may be done, announced and published, keeping in view the public interest.
  8. All those may be reverted to their original posts who do not deserve. If available vacant posts and the original position in seniority allow Imad-ud-Din for promotion then allow him to retain/maintain his promotion. Someone has to take bold decisions for correction and keeping the record straight and transparent. All those who are responsible for such kind of litigation and troubles, due to misuse of authority or otherwise, may be brought to justice.
  9. The concerned authority may be consulted not to recommend any junior officer/s for higher position.

May Allah bless us all?

With regards



Muhammad Attaullah

Principal, GHSS Hazar Khawani.

(Inquiry Officer)

(12)

# DIARY

Diary Serial No. (EMIS)	No. and Date of document received	From whom received	File	Special instructions	Diary Serial No.
1429	1984-2041 10/6/13	Misa Saeed Sd(P) Secy PDU	Household Survey in the KPR ware		143
1430	PA/DSA/ES/5-5/ 2013/EM Direct 13-6/13	Mujib Ullah Khan Dy. Secretary (Admin)	Amplification of Chief Minister's Directives		143
1431	2428 20/6/13	SDEO (M) MSR	Pension Papers to Royal M. S. B. Chaukhera		143
1432	1900-2002 19/06/2013	DD (Estab) ESSE WPC	Notification Transfer from		143
1433		وایف اے ڈی، ڈی، ڈی گورنمنٹ ہسپتال	ڈیپارٹمنٹ آف ایڈمنسٹریشن گورنمنٹ ہسپتال		143
1434		GMS Zanda Banda	Departmental to Mr. M. J.		143
1435		محمد امجد زویا لکھنوی	ڈیپارٹمنٹ آف ایڈمنسٹریشن گورنمنٹ ہسپتال		143
1436	2430 24/6/13	SDEO	Amplification of No. Amis Ullah P. P.		143
1436 A	24/6/2013	جان لاکھڑی (سویٹنگ) گورنمنٹ ہسپتال	33/ ڈیپارٹمنٹ آف ایڈمنسٹریشن گورنمنٹ ہسپتال		143

Note: Date of receipt in Branch is to be written on the centre of the page at the beginning of each day receipt. Column 5 is to be left blank unless special instructions are given.