

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Appeal No. 178/2016

Date of Institution ... 02.03.2012

Date of Decision ... 27.09.2017

Khamsul Haq, Principal, BS-18 GHS Rustam Khan Kalli Charsadda. ... (Appellant)

VERSUS1. Government of Khyber Pakhtunkhwa through Chief Secretary and 6 others.  
... (Respondents)MR. ZAHANATULLAH,  
Advocate

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For appellant.

MR. M. ADEEL BUTT,  
Addl Advocate General

...

For respondents.

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MR. NIAZ MUHAMMAD KHAN,  
MR. AHMAD HASSAN

...

...

CHAIRMAN  
MEMBERJUDGMENT

NIAZ MUIHAMMAD KHAN, CHAIRMAN.- This judgment shall dispose of the instant service appeal as well as connected service appeals No. 179/2016 Faisal Khan, , No. 180/2016 Ghulam Zahir, No. 181/2016 Sher Muhammad, No. 182/2016 Ishaq Ali Shah, No. 183/2016 Jamil Ur Rahman, No. 184/2016 Muhammad Siraj, No. 185/2016 Alam Zeb, No. 186/2016 Shahzada, No. 187/2016 Taj Wali, No. 188/2016 Irfan Ullah, No. 189/2016 Amir Zeb, No. 190/2016, Muhammad Irfan, No. 191/2016, Muhammad Javed, No. 192/2016 Sana Ul Haq, No. 193/2016 Sardar Muhammad No. 194/2016 Sarfaraz Nathaniel, No. 195/2016 Waqar Khan, No. 196/2016 Ghulam Raziq, No. 205/2016 Muhammad Ihsan Shah, No. 206/2016 Sher Yazdan as in all the appeals common questions of law and facts are involved.

2. Arguments of the learned counsel for the parties heard and record perused.

### **FACTS**

3. The appellants applied for the post of principal on the basis of an advertisement dated 07.4.2011 for the post of Principal Elementary & Secondary School. The appellants were then finally appointed alongwith many others through an order dated 25.08.2015. The appellants aggrieved from one of the conditions at the footing of appointment order whereby the recruitment is terms as school based and shall not be transferable to any other school. Against this condition appellants filed departmental appeals and after exhausting departmental remedies the present appeals before this Tribunal.

### **ARGUMENTS**

4. The learned counsel for the appellants argued that impugned condition in appointment order is contrary to the advertisement for the post as there was no such condition in the advertisement. That no such condition could be imposed by the Appointing Authority under the law and rules as no such law and rules exist in this behalf. That in para-4 of the reply the respondents have admitted that the appellants were appointed on regular basis. That the notification dated 30.04.2014 annexed with the reply does not pertain to the appellants rather it pertains to those employees who were recruited on adhoc basis and is confined to PST, DM, PET and CT. That in absence of any law and rules confining the appellants to a particular school is violative of Khyber Pakhtunkhwa Civil Servant Act, 1973. That the department herself has violated the said condition by transferring so many blue eyed Principals to other schools. The learned counsel further argued that confining of service of the appellant to a particular school tantamount to denying of promotion of the appellants.

5. On the other hand learned Addl: AG argued that through the advertisement only qualification and eligibility is mentioned against all the posts and no detail terms and condition were mentioned and that terms and condition are always included in the appointment letter. That at the footing of the advertisement 11 paras pertain to eligibility and not other detailed term and condition have been given in these paras. That Sec-10 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 does not confer any right on a civil servant to get himself transferred to any place within the province and is rather the prerogative of the Government to transfer a civil servant to anywhere within the province. That by inserting the impugned condition the Provincial Government has waived her right and no correspondence right of the appellant has been violated. That according to proviso to Section 10 *supra* those civil servants who are recruited for particular area or region cannot claim his transfer out of that region or area. The learned Addl AG further argued that posting confined to a particular area by no way can be interpreted to mean denial of promotion. That some of the departmental appeals are time barred. He further argued that limiting the appellants to a particular school was not the result of any consultation or collective decision of the Government but was meant for good governance as the department wanted to have the new experience in this regard.


### CONCLUSION

6. Whenever any post is required to be filled by any Government Department it is mandatory with few exceptions for menials that the same should be advertised for public information. Such advertisement mainly assimilates the main criteria for eligibility including age, domicile, experience, quota and qualification, etc. And if any advertisement is deficient or over loaded qua the details given in the rules/law/ method of recruitment then in such eventuality the rules/law/method of recruitment shall prevail. And if any condition is contrary to any rules/law/method of recruitment then

the later shall prevail because nobody can act contrary to law/rules nor any citizen or department can <sup>take</sup> shelter under ignorance of law/rules. This is clear from Section 5 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 which ordains that appointment shall be made as prescribed. And prescribed means prescribed by rules. The advertisement in the present appeal is therefore subject to law/rules/method of recruitment and any condition which is not included in the law/rules/method of recruitment shall have no effect. Similarly <sup>any</sup> condition which is mentioned in the law/rules/ method of recruitment and not mentioned in the advertisement shall be presumed to be there in the advertisement. It is correct that posts can be filled for different cadres and any cadre can be regional/area based. Regardless of the advertisement in the present appeal this Tribunal is to see whether there is any law/rules/method of recruitment where by the post of Principal E&SE has been declared to be area/regional based/school based. Nothing has been shown by the respondents regarding any law/rules/method of recruitment to make these posts of appellant school based. Therefore, the impugned condition is contrary to law/rules/method of recruitment and is void ab-initio. No Executive Authority can introduce any condition contrary to primary or delegated legislation on the pretext of good governance because not following law/rules itself is bad governance. The proviso to Section 10 is confined to those posts which have been declared by rules as regional/area based. The Provincial Government though has the prerogative to transfer any civil servant to anywhere in the province and can exercise or not exercise this from time to time in the public interest but in exercise of such powers no condition can be imposed on the appellant to confine them to particular school forever and making the post as school based. Additionally some transfers of the Principals standing at equal footings with the appellants by the department further strengthens the case of the appellant.

7. As it has been held above that the very condition is void no limitation shall run against such void condition.

8. Consequently all these appeals are accepted and the impugned condition is set aside being not existent from the date of its incorporation in the appointment letter. Parties are left to bear their own costs. File be consigned to the record room.



(AHMAD HASSAN)  
MEMBER

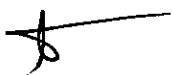


(NIAZ MUHAMMAD KHAN)  
CHAIRMAN

ANNOUNCED  
27.09.2017

20.04.2017

Counsel for the appellant present. Mr. Hameed-ur-Rehman, AD (litigation) alongwith Mr. Muhammad Adeel Butt, Additional AG for the respondents also present. During the course of arguments it was stated that policy stood incorporated in the recruitment rules notified by the Provincial Government. Learned Additional AG is directed to produce the relevant rules and assist the Tribunal on the next date of hearing. To come up for relevant rules and arguments on 21.06.2017 before D.B.


  
(Ahmad Hassan)  
Member

  
(Muhammad Amin Khan Kundi)  
Member

21.06.2017

Appellant in person present. Mr. Kabir Ullah Khattak, Assistant AG for the respondents present. Appellant requested for adjournment. Adjourned. To come up for arguments on 27.09.2017 before D.B.

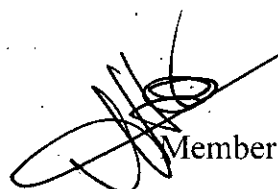
  
(Gul Zeb Khan)  
Member

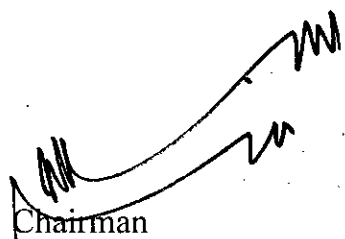
  
(Muhammad Amin Khan Kundi)  
Member

27.09.2017

Counsel for the appellant and Addl. A.G alongwith Hameedur Rahman, AD for the respondents present. Arguments heard and record perused.

As per our detailed judgment of today, this appeal is accepted. Parties are left to bear their own costs. File be consigned to the record room.

  
Member

  
Chairman

ANNOUNCED  
27.09.2017

22.08.2016

Agent to counsel for the appellant, M/S Khurshid Khan, SO & Hameed-ur-Rehman, AD (lit.) alongwith Additional AG for respondents present. Joint para-wise comments on behalf of respondents No. 1 to 4, 6 & 7 submitted. The learned Additional AG requested for adjournment on behalf of respondent No. 5. To come up for written reply/comments on behalf of respondent No. 5 on 26.09.2016 before S.B.

Member

26.09.2016

Appellant in person and Mr. Masroof Gul, Supdt. for respondent No. 5 alongwith Addl. AG for respondents present. Respondents No. 1 to 4, 6 and 7 already submitted written reply. Respondent No. 5 relies on the written reply by respondents No. 1 to 4, 6 and 7. The appeal is assigned to D.B for rejoinder and final hearing on 9.01.2017.

Chairman

09.01.2017

Counsel for the appellant and Assistant AG for respondents present. Rejoinder submitted which is placed on file. To come up for arguments on 20.04.2017.

(AHMAD HASSAN)  
MEMBER

(MUHAMMAD AAMIR NAZIR)  
MEMBER

22.03.2016

Counsel for the present. Learned counsel for the appellant argued that on the strength of advertisement dated 7.4.2011 appellant applied for the post of Principal/Vice Principal (BPS-18) and that after due process adopted by the Public Service Commission, appellant appointed vide Notification dated 25.8.2015 wherein condition No.6 regarding the terms and conditions of service of the appellant was added debarring the appellant from transfer/posting to another position and thereby affecting his privileges attached to the terms and conditions of service of the appellant. That against the said clause appellant preferred departmental appeal, however, the grievances of the appellant were not redressed constraining him to prefer the instant service appeal.

Appellant Deposited  
Security & Process Fee


That the said impugned clause (condition No. 6) is discriminatory and violative of the terms and conditions of service of civil servant and that an illegal constraint has been imposed against the appellant debarring him from availing the privileges attached with the terms and conditions of service of the appellant.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 12.5.2016 before S.B.

  
Chairman

12.05.2016

None present for appellant. M/S Khurshid Khan, SO and Hameed-ur-Rehman, AD (lit.) alongwith Addl: AG for respondents present. Representative informed that written reply is under process and requested for adjournment. Request is accepted. Adjourned for written reply/comments to 22.08.2016 before S.B.



  
Member



Form- A  
FORM OF ORDER SHEET

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

Case No. 178/2016


S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	02.03.2016	<p>The appeal of Mr. Khamsul Haq resubmitted today by Mr. Azahanatullah Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>22-3-16</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

The Joint appeal M/S Shahzada , Sher Muhammad, Ghulam Zahir, Khamsul Haq, Faisal Khan, Alamzeb, Jamil-ur-Rehman, Muhammad Siraj, Ishaq Ali Shah, Taj Wali, Irfanullah, Sannul Haq, Sher Yazdan, Sarfaraz Nathanie, Muhammad Irfan, Ghulam Raziq, Sardar Muhammad, Waqar Khan, Amir Zeb, Muhammad and Muhammad Ihsan Shah received to-day i.e. on 25.02.2016 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Addresses of respondent Nos. 3, 7 and 8 of the appeal are incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 2- The authority whose order is challenged has not been impleaded as necessary party.
- 3- Heading of the appeal is incomplete which may be completed.
- 4- Sub-rule-2 of rules-3 of the appeal rules 1986 requires that every affected civil servant prefer the appeal separately/ individually. Therefore the appeal of the above named appellants be filed separately/individually.
- 5- Annexures of the appeal may be attested.
- 6- Memorandum of appeal may be got signed by the appellants.
- 7- Three copies/sets of the appeal along with annexures i.e. complete in all respect for Tribunal and one for each respondent in each appeal may also be submitted.

No. 314 /S.T,

Dt. 26/2/2016.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Zahanatullah Adv. Pesh.

W.P. Province  
Service Tribunal  
Case No. 159  
Date 02-3-16

019

019  
12/19

2/03/16

~~Stock Returns~~

all observations  
are removed

Re-submitted

BEFORE THE KHYBER PAKHTUNKHWA, SERVICES TRIBUNAL,  
PESHAWAR

Appeal No. 178 /2016

Khamsul Haq  
Versus  
Govt of KPK etc

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Dated: 26/02/2016

  
Appellant

Through

  
ZAHANAT ULLAH,

Advocate, High Court Peshawar



BEFORE THE KHYBER PAKHTUNKHWA, SERVICES TRIBUNAL, PESHAWAR

Appeal No. 178 /2016

Khamsul Haq Principal BS-18 GHS Rustam Khan Kalli Charsadda.

... APPELLANT

VERSUS

1. Govt of Khyber Pakhtunkhwa, through Chief Secretary.
2. Secretary Elementary & Secondary Education, Peshawar.
3. Director E&SE Khyber Pakhtunkhwa, Peshawar.
4. District Education officers (male). *Peshawar.*
5. Director Recruitment Khyber Pakhtunkhwa, Public Service Commission.
6. Deputy Director Establishment Directorate of Elementary & Secondary Education Peshawar.
7. Director Elementary & secondary Education, Peshawar.

... RESPONDENTS

APPEAL UNDER SECTION 4 OF THE SERVICES TRIBUNAL ACT 1974 AGAINST THE IMPUGNED ORDER / NOTIFICATION NO. SO(S/M)/E8 SED/3-2/2014 /RECRUITMENT OF PRINCIPAL (18) MALE DATED 25/08/2015, WHEREBY AN ILLEGAL CLAUSE / CONDITION I.E. "THEIR RECRUITMENT SHALL BE SCHOOL BASED AND SHALL NOT BE TRANSFERABLE TO ANY OTHER SCHOOL" WAS INSERTED IN THE SAID NOTIFICATION

Prayer in appeal:

On acceptance of this appeal respondents may kindly be directed to withdraw / delete, declare null & void (being illegal and against the law), condition no.6 included in the appointment order notification No. SO(S/M)/E8 SED/3-2/2014 /Recruitment of Principal (18) Male dated 25/08/2015 of the appellant as the said condition never reflected as a term and condition in the advertisement dated 07/04/2011 for the recruitment of the said post

re-submitted to-dag  
and filed.

*Abdul*  
Registrar 2/3/16

Respectfully Sheweth,

The appellant respectfully submit as under:

1. That the appellant was serving in regular capacity in education department.
2. That the public service commission Khyber Pakhtunkhwa advertised / announced 67 vacancies of Principals / Vice Principals BPS 18 in elementary & secondary education vide its advertisement No.2/2011 in Newspaper on its website. (Copy of advertisement is attached as annexure A).
3. That the appellant being eligible candidate applied for the said post through proper channel and after due process he was selected for the same post.
4. That according to the recommendation of public services Commission Khyber Pakhtunkhwa the appellant was appointed vide order dated 25/08/2015. (Copy of the appointment order is attached as annexure B).
5. That in the said appointment order 25/08/2015 an illegal and illogical condition no. 6 was included, the same is reproduced as “their recruitment shall be school based as shall not be transferable to any other school”.
6. That being aggrieved of the above mentioned condition no.6 in his appointment order the appellant filed a departmental appeal on dated 7/09/2015. (Copy of departmental appeal attached as annexure C).

7. That to the utter surprise and disappointment of the appellant his departmental appeal was dismissed on dated 28/1/2016 received by the appellant on 9/2/2016, hence the present appeal. (Copy of the order is attached as annexure D).

#### GROUNDS OF APPEAL:

- A. That the said condition no.6 was not mentioned in the advertisement dated 07/04/2011.
- B. That the above referred condition no.6 is against the Civil servant Act 1973.
- C. That the said condition is against the Civil servants (Appointment, promotion and transfer) Rules 1989.
- D. That the said condition is even against the norms of natural Justice and in violation of the fundamental right of the appellant guaranteed by 1973 constitution.
- E. That similar nature of appointments were made by respondents vide its Notification No. SO(SIM) E&SED/3-2/2007/Principal/V.P BPS (18) wherein no such condition was included, so the conduct of the respondent is discriminatory in nature towards appellant, to the extent of condition no.6. (Copy of notification No. SO(SIM) E&SED/3-2/2007/Principal/V.P BPS (18) is attached as annexure E).



F. That any other point of law and facts will be argued at the time of arguments with the prior permission of this Honourable tribunal.

It is, therefore, most humbly prayed that on acceptance of this appeal respondent may kindly be directed to withdraw / delete, declare null & void (being illegal and against the law) condition no.6 included in the appointment order notification No. SO(S/M)/E8 SED/3-2/2014 /Recruitment of Principal (18) Male dated 25/08/2015 of the appellant as the said condition never reflected as a term and condition in the advertisement dated 07/04/2011 for the recruitment of the said post.

Dated: 26/02/2016

Appellant 

Through

  
ZAHANAT ULLAH,  
Advocate, High Court Peshawar.

CERTIFICATE:

Certified that no such like appeal has earlier been filed before this Honourable court.

  
DEPONENT



5

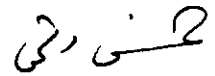
BEFORE THE KHYBER PAKHTUNKHWA, SERVICES TRIBUNAL,  
PESHAWAR

Appeal No. \_\_\_\_\_/2016

Khamsul Haq  
Versus  
Govt of KPK etc

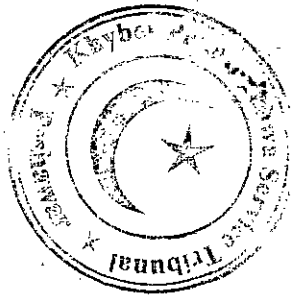
AFFIDAVIT

I, Khamsul Haq Principal BS-18 GHS Rustam Khan Kalli Charsadda, do hereby solemnly affirm and declare that the contents of the instant appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.



Deponent

**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR**



APPEAL NO. 926 /2016

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 828

Dated 10-8-2016

Shah Room Khan, Subject Specialist (Urdu),  
GHSS Kalam, Swat.

(Appellant)

**VERSUS**

1. The Chief Secretary Civil Secretariat, Khyber Pakhtunkhwa, Peshawar.
2. The Secretary (E&SE) Civil secretariat Khyber Pakhtunkhwa, Peshawar.
3. The Director (E&SE) Khyber Pakhtunkhwa, Peshawar.

(Respondents)

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APPEAL UNDER SECTION 4 OF THE SERVICE TRIBUNAL ACT, 1974  
AGAINST THE ORDER DATED 15.07.2016, WHEREBY THE  
DEPARTMENTAL APPEAL OF THE APPELLANT AGAINST THE  
CONDITION NO.7 OF THE APPOINTMENT ORDER HAS BEEN  
REJECTED FOR NO GOOD GROUNDS.

**PRAYER:**

THAT THE ACCEPTANCE OF THIS APPEAL, THE ORDER DATED  
15.07.2016 MAY BE SET ASIDE AND THE CONDITION NO.7 OF  
APPOINTMENT ORDER MAY BE DECLARED AS ILLEGAL,  
UNLAWFUL, WITHOUT LAWFUL AUTHORITY AND AGAINST THE  
PRINCIPLES GOVERNING PROVINCIAL CADRE POST. THE  
RESPONDENTS MAY FURTHER BE DIRECTED TO  
AMEND/WITHDRAW THE CONDITION NO.7 OF THE  
APPOINTMENT ORDER DATED 10.12.2014 BY DECLARING THE  
SUBJECT SPECIALIST POST AS TRANSFERABLE POST BEING  
PROVINCIAL CADRE POST. ANY OTHER REMEDY WHICH THIS  
AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT MAY  
ALSO BE AWARDED IN FAVOUR OF APPELLANT.

Filed to-day

Registrar


10/8/16.

Re-submitted to-day  
and filed.

Registrar

01/09/2016

**ATTESTED**

  
EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

Shah Room Khan vs Govt



27.092017

Counsel for the appellant and Addl. A.G alongwith Hameedur Rahman, AD for the respondents present. Arguments heard and record perused.

The broad facts and legal issues involved in the instant service appeal are similar to service appeal No. 178/2016, entitled "Khamdul Haq Vs. Government of Khyber Pakhtunkhwa through Chief Secretary, Peshawar and others" decided today on 27.09.2017. This appeal is also accepted as per judgment in the aforementioned service appeal. Parties are left to bear their own costs. File be consigned to the record room.

Announced Sd/- Niaz Muhammad Khan,  
27-09-2017 Chairman

Sd/- Ahmad Hassan,  
Member

Certified to be true copy  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

(S) ~~SECRET~~ 6 A

**KHYBER PAKHTUNKHWA PUBLIC SERVICE COMMISSION**

**2- Fort Road Peshawar Cantt:**

**Website: [www.nwfppsc.gov.pk](http://www.nwfppsc.gov.pk)**

**Tele: Nos. 091-9214131, 9213563, 9213750, 9212897**

Dated: 07.04.2011

**ADVERTISEMENT No. 02 / 2011.**

Applications, on prescribed form, are invited for the following posts from Pakistani citizens having domicile of Khyber Pakhtunkhwa / F.A.T.A by **07.05.2011** (candidates applying from abroad by **21.05.2011**). Incomplete applications and applications without supporting documents required to prove the claim of the candidates shall be rejected without intimation to the candidates.

<b>AGRICULTURE, LIVESTOCK &amp; CO-OPERATIVE DEPTT:</b>	
1.	<p><b>FIVE (05) POSTS OF FEMALE LIVESTOCK PRODUCTION OFFICER (HEALTH) IN L&amp;DD DEPTT:</b></p> <p><b>QUALIFICATION:</b> (i) B.Sc (Hons) Animal Husbandry from a recognized University; OR (ii) Doctor of Veterinary Medicine (DVM) or equivalent qualification in veterinary sciences from a recognized university and registered with Pakistan Veterinary Medical Council.</p> <p><b>AGE LIMIT:</b> 22 to 35 years. <b>PAY SCALE:</b> BPS-17 <b>ELIGIBILITY:</b> Female. <b>ALLOCATION:</b> Two to Zone-1 and One each to Zone-2, 3 and 5.</p>
2.	<p><b>THREE (03) POSTS OF SOIL CONSERVATION ASSISTANT</b></p> <p><b>QUALIFICATION:</b> (a) M.Sc Agriculture (Soil Science) from a recognized University; OR (b) B.Sc (Hons) Agriculture with Soil Science as major subject obtained after four years of academic instructions after F.Sc from a recognized university; OR (c) B.sc Agriculture Engineering from a recognized university.</p> <p><b>AGE LIMIT:</b> 21 to 35 years. <b>PAY SCALE:</b> BPS-17 <b>ELIGIBILITY:</b> Both Sexes. <b>ALLOCATION:</b> One each to Merit, Zone-1 and 5.</p>
3.	<p><b>ONE (01) POST OF BIO-CHEMIST</b></p> <p><b>QUALIFICATION:</b> Doctor of Veterinary Medicine (DVM) or equivalent qualification in veterinary sciences with M.Sc in Biochemistry or M.Sc (Hons) in Animal Husbandry recognized by Pakistan Veterinary Medical Council.</p> <p><b>AGE LIMIT:</b> 25 to 32 years. <b>PAY SCALE:</b> BPS-17 <b>ELIGIBILITY:</b> Both Sexes. <b>ALLOCATION:</b> Merit.</p> <p style="text-align: right;"><i>Signature</i> Sarghosh Khan Add'l Secy High Court</p>
<b>C &amp; W DEPARTMENT</b>	
4.	<p><b>THIRTEEN (13) POSTS OF JUNIOR SCALE STENOGRAPHER.</b></p> <p><b>QUALIFICATION:</b> (i) Intermediate or equivalent qualification from recognized a Board. (ii) A speed of 60 words per minute in Shorthand in English and 35 words per minute in</p>

**SECRETED**  
*Signature*



5. ONE (01) POST OF DATA ENTRY OPERATOR.

QUALIFICATION: (i) 2<sup>ND</sup> Division FA/ F.Sc with one year Diploma in Computer Science from a recognized Institute. (ii) Speed of Ten Thousand Key Depression per hour for punching data entry verification.

AGE LIMIT: 18 to 30 years. PAY SCALE: BPS-11 ELIGIBILITY: Both Sexes ALLOCATION: Zone-1.

ELEMENTARY AND SECONDARY EDUCATION DEPTT:

6. SIXTY SEVEN (67) POSTS OF PRINCIPAL/ VICE PRINCIPAL

QUALIFICATION: Master Degree with M.Ed/ M.A. (Education) or equivalent qualification from a recognized university with nine years teaching/ administrative experience in recognized Secondary School/ Higher Secondary School.

Note: - The teaching experience will be counted after acquiring Master Degree in one of the general subjects or M.Ed.

AGE LIMIT: 25 to 40 years. PAY SCALE: BPS-18 ELIGIBILITY: Male ALLOCATION: Merit

7. TWENTY FIVE (25) POSTS OF HEADMASTER

QUALIFICATION: Master Degree with B.Ed/ M.Ed/ M.A. (Education) or equivalent qualification from a recognized university and five years teaching experience in High/ Middle School owned or recognized by the Government.

Note: - The teaching experience will be counted after acquiring Master Degree in one of the general subjects or M.Ed.

AGE LIMIT: 25 to 40 years. PAY SCALE: BPS-17 ELIGIBILITY: Male ALLOCATION: Six to Merit, Four each to Zone-1, 2, 3 and 5 and three to Zone-4.

ENVIRONMENT DEPARTMENT

8. FIVE (05) POSTS OF SUB DIVISIONAL FOREST OFFICER IN FOREST DEPTT:

QUALIFICATION: Master Degree in Forestry from a recognized university/ institution or Second Class Bachelor Degree in Forestry from a recognized university/ institute or Second Class Bachelor's Degree in Agriculture or other Science subjects from a recognized university/ institute.

AGE LIMIT: 21 to 32 years. PAY SCALE: BPS-17 ELIGIBILITY: Male ALLOCATION: One each to Merit, Zone-1, 2, 3 and 4.

9. FOUR (04) POSTS OF ASSISTANT DIRECTOR FISHERIES (INCLUDING ONE LEFT OVER POST OF ZONE-5).

QUALIFICATION: Master Degree in Fisheries or M.Sc Zoology preferably with specialization in Fisheries/ Fresh Water Biology from a recognized university.

AGE LIMIT: 21 to 35 years. PAY SCALE: BPS-17 ELIGIBILITY: Male ALLOCATION: One each to Zone-2, 3, 4 and 5.

10. ONE (01) POST OF ASSISTANT RESEARCH OFFICER/ EXTENSION FIELD OFFICER IN FISHERIES

QUALIFICATION: M.Sc Zoology/ Fisheries preferably with specialization in Fisheries

*Handwritten signature and notes on the right side of the page.*

ATTESTER  
*Handwritten signature and initials.*

- (i) Age shall be reckoned on 07.05.2011. Maximum age limit as prescribed in the recruitment rules shall be relaxed upto 10 years for Govt Servants who have completed 2 years continuous service and upto 3 years for candidates belonging to backward areas specified in the appendix attached to the NWFP Initial Appointment to Civil Posts (Relaxation of Upper Age Limit) Rules, 2008. However, a candidate shall be allowed relaxation in age in one of the above categories provided that the candidates from backward areas, in addition to automatic relaxation of three years shall be entitled to one of the relaxations available to Govt Servants, general or disabled candidates, whichever is relevant and applicable to them.
- (ii) Degrees / Diploma / Experience Certificates / Testimonials of unrecognized Institution are not accepted. Only original Degrees / Certificates are accepted. However, the candidates can apply on provisional certificate signed by the Controller of Examination of the respective Institution but candidates shall produce original degrees / certificates before their selection. Detail Marks Certificates for all the examinations shall necessarily be required and these should be attached with the application forms.
- (iii) Ex-armed Forces Personnel must send copy of Discharge Certificate with their applications. Govt. / Semi Govt. / Autonomous / Semi Autonomous Bodies employees may apply direct but their Departmental Permission Certificates should reach within 30 days of the closing date.
- (iv) Applications should be on the prescribed application form obtainable from the listed below branches of the NATIONAL BANK OF PAKISTAN. Application Fee is Rs.285/- (Rupees Two Hundred Eighty Five only) for all the candidates. In addition to the application fee, the candidates will have to pay Rs.15/- (rupees fifteen only) on account of Bank Charges. Separate application form will be required for each advertised category of posts. Application forms obtained other than the specified branches of the National Bank will be considered invalid and such applications will not be entertained. The applications on plain paper or Photostat shall not be accepted. Incomplete and late applications shall also be ignored.
- (v) Applications must be submitted within time as no extra time is allowed for postal transit. The applications if submitted on the last date for receipt of applications must reach the Commission's office by the closing hours.
- (vi) Applicants married to Foreigners are considered only on production of the Govt. Relaxation Orders.
- (vii) No applicant shall be considered in absentia on paper qualifications unless, he/she possesses exceptionally higher qualifications than the minimum prescribed qualification for a particular post(s).
- (viii) Govt. reserves the right not to fill any or fill more or less than the advertised post(s).
- (ix) Candidates who have already availed three chances by physical appearance before the Commission and have failed for the post(s) having one and the same qualifications and scale of pay shall be ineligible.
- (x) Experience wherever prescribed shall be counted after the minimum qualifications for the post(s), if not specifically provided otherwise against the advertised post(s).
- (xi) In case the number of applications of candidates is disproportionately higher than the number of posts, short listing will be made in anyone of the following manner: -
  - (a) Written Test in the Subject.
  - (b) General Knowledge or Psychological General Ability Test.
  - (c) Academic and/or Professional record as the Commission may decide.

*Abdullah Khan*  
 Registrar  
 District Court  
 District Muzaffargarh

**ATTESTED**  
*Abdullah Khan*



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Dated Peshawar the August 25, 2015

NOTIFICATION

NO.SO(S/M)E&SED/3-2/2014/Recruitment of Principal (BS-18) (Male):- Consequent upon recommendations of Khyber Pakhtunkhwa Public Service Commission Peshawar, the Competent Authority is pleased to appoint the following fifty five (55) candidates of Teaching Cadre as Principals (BS-18) Male (Rs.25940-1950-64940) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government with immediate effect on the terms and conditions as given below:-

Sr. #	Name, Father Name and Address	Domicile/ Zone
1	Mr. Alam Zeb, S/O Jehan Zeb, Yousaf Zai Medical Store Hospital Road Timergara Tehsil Timergara Dir Lower.	Dir/ 03
2	Mr. Anis-ur-Rehman, S/O Toti Rehman, Moh: Ambar Cham District P.O and Tehsil Dir Upper.	Dir/ 03
3	Mr. Arif Ullah Khan S/O Ghulam Jan, Village and P.O Shahbaz Khel Tehsil & District Lakki Marwat.	Lakki Marwat/ 04
4	Mr. Aurang Zaib S/O Jahan Zen, House No.94 Sector No.4 Mohallah Darband Kalabat Town Ship Haripur.	Haripur/ 05
5	Mr. Faisal Khan S/O Missal Khan, C/O Star Hardware and Paint Store, Main Bazar Havelian Tehsil Havelian Distt: Abbottabad.	Abbottabad/ 05
6	Mr. Ghulam Raziq S/O Fazli Raziq Village Zakhi Miana P.O Akbar Pura Tehsil & District Nowshera.	Nowshera/ 02
7	Mr. Ghulam Zahir S/O Ghulam Farooq Village & P.O Bishgram Tehsil Lal Qilla District Dir Lower.	Dir/ 03
8	Hafiz Shams-ur-Rehman S/O Ahmed Ali, C/O Moulvi Ahmad Ali General Store Hospital Road P.O Sarai Naurang Lakki Marwat.	Lakki Marwat/ 04
9	Mr. Hayat Ullah S/O Shams-ul-Qamar, Mohallah Pinda Khel P.O Charsadda Town Teh & District Charsadda.	Charsadda/ 02
10	Mr. Hikmatullah S/O Ali Muhammad C/O Yousaf Medicose Hospital road Sarai Naurang P.O Sarai Naurang Tehsil Sarai Naurang Distt: Lakki Marwat.	Lakki Marwat/04
11	Mr. Intiaz Ali S/O Allah Dad Regional Institute of Teachers Education (Male) Haripur.	Haripur/ 05
12	Mr. Inayat-ul-Haq S/O Lutfullah, C/O Doctor Ihsan-ul-Haq Al-Noor Medical Complex near Allaho-akbar Mosque Saidu Sharif Swat.	Shangla/03
13	Mr. Irfanullah S/O Amin Ullah House # 850, Sadiq Abad Gul Dara Chowk P.O Namak Mandi Kakshal Peshawar.	Dir/ 03
14	Mr. Ishaq Ali Shah S/O Muhib Ali Shah Village and P.O Urmar Payan Tehsil & District Peshawar.	Peshawar/ 02
15	Mr. Jamil-ur-Rehman S/O Said Akbar Khan Village & P.O Pabaini Tehsil & District Swabi.	Swabi/ 02
16	Mr. Jehad Muhammad S/O Shamsul Muhammad Mohallah Zakarya Khail village & P.O Kaddi Tehsil & Distt: Swabi.	Swabi/ 02
17	Mr. Kamal-ud-Din S/O Khesrow C/O Qamarudin Chatrali Mohd Dad Near Masjid Babus Salam Dabgari Peshawar.	Chitral/ 03
18	Mr. Khams-ul-Haq S/O Mian Habib Jan, Village Panam Dheri P.O Mathra Tehsil & Distt: Peshawar.	Peshawar/ 02
19	Mr. Khan Afsar S/O Mir Afzal, Tanawal Book:Depott: Cantt: Bazar Abbottabad.	Abbottabad/ 05
20	Mr. Khurshid Alam S/O Qamar Zaman, Village & P.O Dheri Allahdand Moh: Azikhel Tehsil Batkhela District Malakand.	Malakand/ 03
21	Mr. Khurshid Khan S/O Mian Jan, Govt. Higher Secondary School Takht Bhai. District Mardan.	Mardan/ 02
22	Mr. Majeed Ullah S/O Gul Mulla, Village and P.O Hathan Teh Takht Bhai District Mardan. C/O Rahimullah Shookeeper Hathan.	Dir/ 03

ATTESTED

*[Handwritten Signature]*

(9A)

Sr. #	Name, Father Name and Address	Domicile/ Zone
23	Mr. Mohabat Shah S/O Arifullah Jan C/O Tajak Book Depott Main Bazar Timergara Dir Lower.	Dir/ 03
24	Mr. Muhammad Ibrahim S/O Daud Khan, Mohallah, Walayat Khail Via Shahbaz village & P.O Tordher Tehsil Lahor District Swabi.	Swabi/ 02
25	Mr. Muhammad Ihsan Shah S/O Syed Daulat Shah, C/O Janbad Shah Chemist and Druggist Jamrud Bazar Khyber Agency.	Khy: Agy/ 01
26	Mr. Muhammad Irfan, S/O Faqir Gul 159 Durani House C/O Charsadda Medicose Street No.06 Tajabad Town P.O Peshawar University.	Peshawar/ 02
27	Mr. Muhammad Javid Khan S/O Hukmat Khan, Village & P.O Shabqadar Azim Khan Qilla Tehsil Shabqadar District Charsadda.	Charsadda/ 02
28	Mr. Muhammad Saddique S/O Alim Shah, C/O Lub Gas Agency Tehsil Road Karak.	Karak/ 04
29	Mr. Muhammad Siraj S/O Muhammad Ashraf, House #5261/E Moh: Kandar Kohat Road Bhana Mari Peshawar.	Peshawar/ 02
30	Mr. Munir Khan S/O Zarif Khan, Rehman General Store Aziz Market Dargai Bazar Malakand.	Malakan/ 03
31	Mr. Nizar Ali S/O Sardar Ali GHSS Tarnab Charsadda.	Charsadda/ 02
32	Mr. Riaz-ud-Din S/O Mohay-ud-Din, Village Gosam Tehsil Monda District Dir Lower.	Bajaur Agy./ 01
33	Mr. Safeer Ullah Khan S/O Ruck-nu-Din Village Lass Garhi Bosti Khel Dara Adam Khel F.R Kohat.	F.R Kohat/ 01
34	Mr. Sajid Elahi S/O Imam Din, C/O Waheed Cloth House, Sohrab Market Balakot, District Mansehra.	Mansehra/ 05
35	Mr. Sajjad Ahmad S/O Muhammad Ayub Govt. Centenial Model School (GHS No.3) Mansehra.	UDA Mansehra/ 03
36	Mr. Sana-ul-Haq S/O Shams-ul-Haq Village & P.O Srikh Marozai Tehsil Shabqadar District Charsadda	Charsadda/ 02
37	Mr. Saqib Tanveer S/O Sekhi Muhammad Tanveer, 10 Civil Lines Jail Road D.I.Khan.	D.I.Khan/04
38	Mr. Sardar Muhammad S/O Mirza Khan Village & P.O Azakhel Payan Tehsil & Distt: Nowshera.	Nowshera/ 02
39	Sayed Zulfiqar Ali S/O Sayed Ali Bahadur Shah Village & P.O Nawagai Tehsil Mandarn District Buner.	Buner/ 03
40	Mr. Shafqat Hussain S/O Muhammad Ashraf, C/O Irshad Shopkeeper Near Makki Masjid Link Road Abbottabad.	Abbottabad/ 05
41	Mr. Shah Zada S/O Haider Khan, Village & P.O Dehri Alladand Moh: Miras Khel Malakand.	Malakand/ 03
42	Mr. Sher Mohammad S/O Shamsor Rehman Vill: & P.O Chakesar Tehsil Chakesar District Shangla.	Shangla/ 03
43	Mr. Sher Yazdan S/O Abdul Dayan, Village Kurvi P.O Taru Jaba Tehsil & Distt: Nowshera.	Nowshera/ 02
44	Mr. Taj-Walaj S/O Maq Bali, Village Sufaid Sung Moh: Wand Khel P.O Shahgai Bazar Tehsil & District Peshawar.	Peshawar/ 02
45	Mr. Taqweem-ul-Haq S/O Abdur Raziq House # F-46 Right Bank Colony Torbela Dam Tehsil Toppi District Swabi.	Swabi/ 02
46	Mr. Waqar Khan S/O Sifat Ullah, Village and P.O Masho Khel Kandi Fateh Khan Khel Kandi Tehsil and District Peshawar.	Peshawar/ 02
47	Mr. Zahoor Khan S/O Abdul Qayyum Khan Village Garhi Mali Khel P.O Badaber Teh&District Peshawar.	Peshawar/ 02
48	Mr. Amir Zeb S/O Mustafa Kamal, Govt. High School Rustam P.O Rustam District Mardan.	Mardan/ 02
49	Mr. Assim Saeed S/O Muhammad Saeed, Basti Ustrana North Near Boys Primary School Dera Ismail Khan.	D.I.Khan/ 04
50	Mr. Kifayatullah S/O Rafiullah Kahn Village & P.O Mayar Moh: Amukhel Tehsil & District Mardan.	Mardan/ 02
51	Mr. Munhamir Khan S/O Gul Rehman Village & P.O Gandaf Mohallah Shabi Khel Tehsil Topi District Swabi.	UDA Swabi/ 03
52	Mr. Saif-ur-Rehman S/O Sultan Khan Headmaster GHS Mandew Bannu.	Lakki Marwat/ 04
53	Mr. Sarfaraz Nathaniel S/O B-Nathaniel Alizabeth Girls School and College Dabgari Gardan Peshawar.	Peshawar/ 02
54	Mr. Shakil Ahmad S/O Mehtab Khan Govt. High School No.2, Becket Gunj Mardan.	Mardan/ 02



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Sr. #	Name, Father Name and Address	Domicile/ Zone
55	Mr. Shamsul Hadi S/O Mufassir Khan C/O Gulab Stationary Mart Near MCB Bank Battagram, District Battagram.	Battagram/ 03
56	Mr. Tariq Jamal S/O Said Jamal, House No.440 Street No.10 Sector "R" Sheikh Maltoon Town Mardan.	Mardan/ 02

2. Consequent upon their appointment as Principal BS-18, they are posted on positions and stations as noted against each:

S.#	Name, Father's Name and Addresses	Domicile/ Zone	Posted as	Remarks
1.	Mr. Alamzeb S/O Jehanzeb, Yousaf Medical Store Hopital Road Timergara Tehsil Timergara Dir Lower	Dir /03	Vice Principal B-18 GHSS Khan Pur Dir Lower	Against Vacant Post
2.	Mr. Anis Ur Rehman S/O Toti Rehman, Mohallah Ambar Cham District PO and Tehsil Dir Upper	Dir /03	Principal B-18 GHSS Kulandi Dir Upper	--do--
3.	Mr. Arif Ullah Khan S/O Ghulam Jan, Village and PO Shahbaz Khel Tehsil and District Lakki Marwat	Lakki Marwat/04	Principal B-18 GHS Ranwal Tank	--do--
4.	Mr. Aurangzeb S/O Jehanzeb, House No.94 Sector No.4 Mohallah Darband Kalabat Town Ship Tehsil and District Haripur	Haripur/ 05	Principal B-18 GHS Sector No.3 KT Ship Haripur	Vice Serial No.56
5.	Mr. Faisal Khan S/O Misal Khan, C/O Star Hardware and Paint Store Main Bazar Havelian Tehsil Havelian District Abbottabad	A.A/05	Principal B-18 GHS Namal Abbottabad	Against Vacant Post
6.	Mr. Ghulam Raziq S/O Fazli Raziq, Village Sakhi Maina PO Akbar Pura Tehsil and District Nowshera	NSR/02	Vice Principal B-18 GHSS Rashaki Nowshera	--do--
7.	Mr. Ghulam Zahir S/O Ghulam Farooq Village and PO Bishgram Tehsil Lal Qilla District Dir Lower	Dir /03	Vice Principal B-18 GHSS Wari Dir Upper	--do--
8.	Mr. Hafiz Shamsur Rehman S/O Ahmad Ali C/O Molvi Ahmad Ali General Store Hopital Road PO Sarai Naurang Lakki Marwat	Lakki Marwat/04	Principal B-18 GHS Gara Baloch Tank	--do--
9.	Mr. Hayatullah S/O Shams Ul Qamar Mohallah Painsda Khel PO Charsadda Town Tehsil and District Charsadda	Chd/02	Principal B-18 GCMHS Turangzai Charsadda	--do--
10.	Mr. Hikmatullah S/O Ali Muhammad C/O Yousaf Medicose Hospital Road Sarai Naurang PO Sarai Naurang Tehsil Sarai Naurang District Lakki Marwat	Lakki Marwat/04	Principal B-18 GHS Harama Tala Lakki Marwat	--do--
11.	Mr. Imtiaz Ali S/O Allah Dad RITE (M) Haripur	Haripur /05	Principal B-18 GHSS Kahal Haripur	--do--
12.	Mr. Inayat Ul Haq S/O Lutfullah C/O Dr. Ihsanul Haq Al-Noor Medical Complex near Allaho Akbar Mosque Saidu Sharif Swat	Shangla /03	Vice Principal B-18 GHS Sandovi Shangla	--do--
13.	Mr. Irfan Ullah S/O Amin Ullah House No.850 Sadiq Abad Gul dara Chowk PO Nimak Mandi Kakshal Peshawar	Dir /03	Vice Principal BS-18 GHSS Pir Pai Nowshera.	Vice Sr. No. 69
14.	Mr. Ishaq Ali Shah S/O Mohib Ali Shah Village and PO Urmar Payan Tehsil and District Peshawar	Peshawar /02	Principal B-18 GHS Bagatoo Hangu	--do--
15.	Mr. Jamil Ur Rehman S/O Said Akbar Khan Village and PO Pabini Tehsil and District Swabi	Swabi/02	Principal B-18 GHSS Kalu Khan Swabi	--do--
16.	Mr. Jehad Muhammad S/O Shams Ul Muhammad Mohallah Zakria Khel Village and PO Kaddi Tehsil and District Swabi	Swabi/02	Vice Principal B-18 GHS Swabi	--do--

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S.#	Name, Father's Name and Addresses	Domicile/ Zone	Posted as	Remarks
17.	Mr. Kamal Ud Din S/O Khesrow C/O Qamar Ud din Chitral Mohallad Dad Near Masjid Babus Salam Dabgari Peshawar	Chitral/03	Vice Principal B-18 GCMHS Chitral	Vice Serial No.57
18.	Mr. Khamis Ul Haq S/O Mian Habib Jan Village Panam Dheri PO Mathra Tehsil and District Peshawar	Peshawar /02	Principal B-18 GHS Rustam Khan Killy Zaim Charsadda	Vice Serial No:64
19.	Mr. Khan Afsar S/O Mir Afzal Tanwal Book Depott Cant Bazar Abbottabad	A.A/05	Principal BS-18 GHS Kutwal Abbottabad	Against Vacant Post
20.	Mr. Khurshid Alam S/O Qamar Zaman Village and PO Dheri Allah Dhand Mohallah Azikhel Tehsil Batkhela District Malakand	Malakand/ 03	Instructor B-18 RITE(M) Thana Malakand	--do--
21.	Mr. Khurshid Khan S/O Mian Jan GHSS Takht Bhai District Mardan	Mardan/02	Principal GHS Takhbhai Mardan	Vice Serial No.59
22.	Mr. Majeed Ullah S/O Gul Mulla Village and PO Hathian Tehsil Takht Bhai District Mardan C/O Rahim Ullah Shopkeeper Hathian	Dir/03	Vice Principal B-18 GHS Kot Malakand	Against Vacant Post
23.	Mr. Mohabat Shah S/O Arif Ullah Jan C/O Tajik Book Depott Main Bazar Timegara Dir Lower	Dir /03	Vice Principal B-18 GHSS Munda Dir Lower	--do--
24.	Muhammad Ibrahim S/O Daud Khan Mohallah Walayat Khel Via Shahbaz Village and PO Tordher Tehsil Lahor District Swabi	Swabi/02	Vice Principal B-18 GHS Tordher No.1 Swabi	--do--
25.	Muhammad Ihsan Shah S/O Syed Daulat Shah C/O Janbad Shah Chemist and Druggist Jamrud Bazar Khyber Agency	Khyber Agency/01	Service placed at the disposal of Director of Education (FATA)	FATA
26.	Muhammad Irfan S/O Faqir Gul 159 Durani House C/O Charsadda Medicose Street No.6 Tajabad Town PO Peshawar University	Peshawar/02	Vice Principal BS-18 GHSS Sherpao Charsada	Vice Sr. No. 62
27.	Muhammad Javed Khan S/O Hukmat Khan Village and PO Shabqadar Azim Khan Qilla Tehsil shabqadar District Charsadda	Charsadda/02	Principal B-18 GHS Zarbab Garhi Charsadda	Vice Serial No.58
28.	Muhammad Saddique S/O Halim Shah C/O Lub Gas Agency Tehsil Road Karak	Karak/04	Principal B-18 GHSS Mandori Kohat.	Vice Serial No.66
29.	Muhammad Siraj S/O Muhammad Ashraf House No.5261/E Mohallah Kander Kohat Road Bhana Mari Peshawar	Peshawar/02	Vice Principal B-18 GHSS Urmur Payan Peshawar	Against Vacant Post
30.	Mr. Munir Khan S/O Zarif Khan ,Rehman General Store Aziz Market Dargai Bazar Malakand	Malakand/03	Principal B-18 GHS Ghari Usmani Khel Malakand	Vice Sr. 61
31.	Mr. Riaz Ud Din S/O Mohay Ud Din , Village Gosam Tehsil Munda District Dir Lower	Bajour Agency /01	Services placed at the disposal of Director of Education	FATA
32.	Mr. Safir Ullah Khan S/O Ruck nud Din , Village Las Garhi Bosti Khel Dara Adam Khel FR Kohat	FR Peshawar/01	Services placed at the disposal of Director of Education	FATA
33.	Mr. Sajad Elahi S/O Imam Din , C/O Waheed Cloth House Sohrab Market Balakot District Mansehra	Mansehra /05	Vice Principal B-18 GHSS Jareed Mansehra	Against Vacant Post
34.	Mr. Sajad Ahmad S/O Muhammad Ayub , GCMHS No.3 Mansehra	Mansehra/05	V/Principal B-18 GHSS No.1 Mansehra	--do--
35.	Mr. Sana Ul Haq S/O Shams Ul Haq, Village and PO Srikh Marozai Tehsil Shabqadar District Charsadda	Charsadda/02	Instructor B-18 RITE (M) Mardan	--do--
36.	Mr. Saqib Tanvir S/O Shakhi Muhammad Tanvir, 10 Civil Lines Jail Road D.I.Khan	D.I.Khan/04	Instructor B-18 RITE (M) D.I.Khan	--do--

16/11/10

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S.#	Name, Father's Name and Addresses	Domicile/ Zone	Posted as	Remarks
37.	Mr. Sardar Muhammad S/O Mirza Khan, Village and PO Aza Khel Payan Tehsil and District Nowshera	Nowshera/02	Vice Principal B-18 GHS Lahore Swabi	Against Vacant Post
38.	Syed Zulfiqar Ali S/O Syed Ali Bahader Shah, Village and PO Nawagai Tehsil Mandran District Buner	Buner/03	Vice Principal B-18 GHSS Nawagai Buner	--do--
39.	Mr. Shafqat Hussain S/O Muhammad Ashraf, C/O Irshad Shopkeeper near Makki Masjid Link Road Abbottabad	Abbottabad/05	Principal B-18 GHS Namli Mera Abbottabad	--do--
40.	Mr. Shahzada S/O Haider Khan, Village and PO Dheri Allahdhand Mohallah Mirash Khel Malakand	Malakand/03	Instructor B-18 RITE (M) Thana Malakand	--do--
41.	Mr. Sher Muhammad S/O Shams Ur Rehman, Village and PO Chakesar Tehsil Chakesar District Shangla	Shangla /03	Principal B-18 GHS Qambar Swat	--do--
42.	Mr. Sher Yazdan S/O Abdul Dayan, Village Kurvi PO Taru Jabba Tehsil and District Nowshera	Nowshera/02	Principal B-18 GHS Dagi Banda Nowshera	--do--
43.	Mr. Taj Wali S/O Maqbali, Village Sufaid Sang Mohallah Wadan Khel PO Shagai Bazar Tehsil and District Peshawar	Peshawar/02	Instructor B-18 RITE (M) Haripur	--do--
44.	Mr. Taqweem Ul Haq S/O Abdur Raziq, House No.F-46 Right Bank Colony Turbela Dam Tehsil Topi District Swabi	Swabi/02	Principal B-18 GHS Jhanda Swabi	--do--
45.	Mr. Waqar Khan S/O Sifat Ullah, Village and PO Mashokhel Kandi Fateh Khan Khel Tehsil and District Peshawar	Peshawar/02	Instructor B-18 RITE (M) Kohat	--do--
46.	Mr. Zahoor Khan S/O Abdul Qayum Khan, Village Garhi Mali Khel PO Badber Tehsil and District Peshawar	Peshawar /02	Principal B-18 GHS Sowarian Mardan	Vice Sr. No. 63
47.	Mr. Amir Zeb S/O Mustafa Kamal, GHS Rustam PO Rustam District Mardan	Mardan /02	Vice Principal B-18 GHSS Khair Abad Mardan	Against Vacant Post
48.	Mr. Asim Saeed S/O Muhammad Saeed, Basti, Ustarana North near boys Primary School D.I.Khan	D.I.Khan/04	Principal B-18 GHS Himmat D.I.Khan	--do--
49.	Mr. Kifayat Ullah S/O Rafi Ullah Khan, Village and PO Mayar Mohallah Amukhel Tehsil and District Mardan	Mardan/02	Vice Principal B-18 GHSS Shah Baz Ghari Mardan	--do--
50.	Mr. Munhamir Khan S/O Gul Rehman, Village and PO Gandaf Mohallah Shabi Khel Tehsil Topi District Swabi	Swabi/02	Vice Principal B-18 GHSS Kabgani Swabi	--do--
51.	Mr. Saif Ur Rehman S/O Sultan Khan, HM GHS Mandew Bannu	Lakki Marwat/04	Principal B-18 GHSS Amandi Umar Khan Bannu	--do--
52.	Mr. Sarfaraz Nathaniel S/O B-Nathaniel, Alizabeth Girls School and College Dabgari Garden Peshawar	Peshawar /02	Instructor B-18 PITE Peshawar	--do--
53.	Mr. Shakeel Ahmad S/O Mehtab Khan, GHS No.2 Bicket Gunj Mardan	Mardan /02	Principal B-18 GHS Bakhshali Mardan	Vice Sr. 65
54.	Mr. Shams Ul Hadi S/O Musafar Khan, C/O Gulab Stationery Mart near MCB Battagram	Battagram/03	V/Principal B-18 GHSS Karori Mansehra	Against Vacant Post
55.	Mr. Tariq Jamal S/O Said Jamal, House No.440 Street No.10 Sector - R Sheikh Maltoon Town Mardan	Mardan/02	Principal BS-18 GHS Qasim Toru Mardan	--do--

CONSEQUENTIAL TRANSFER/ ADJUSTMENT

Sr.#	Name and Designation	Consequential-Proposed Posting	Remarks
56	Mr. Jamil Khan, HM B-17 working on B-18 at GHS Sector No.3 KT Ship Haripur	HM B-17 GHS Laban Bandi Haripur	Against Vacant Post
57.	Mr. Mir Wali Khan, HM B-17 Shopkeeper Hathlan,	HM B-17 GHS Shahdhor Chitral	--do--

**ATTESTED**

*[Signature]*

Sr.#	Name and Designation	Consequential-Proposed Posting	Remarks
58	Mr. Ayaz HM B-17 working on B-18 at GHS Zarbab Garhi Charsadda	HM B-17 GHS Attakai Charsadda	Against Vacant Post
59	Abbas Gul, V/Principal BS-18 GHSS Takhbhai Mardan	SS PS BS-18 GHSS Takkar Mardan	Vice Sr. 60
60	Ihsanullah, SS PS BS-18 GHSS Takkar Mardan	Principal B-18 GHS Wartair Malakand	Against Vacant Post
61	Mr. Nek Muhammad HM B-17 working on B-18 at GHS Garhi Usmani Khel Malakand	HM B-17 GHS Prangai Malakand	--do--
62	Basharat Ullah HM BS-17 working on BS-18 GHSS Sherpao Charsadda	HM B-17 GHS Kula Dhand Charsadda	--do--
63	Nasir Ahmad SS Phy BS-18 working as Principal BS-18 GHS Sowarian Mardan	SS Phy BS-18 GHSS Ghani Dheri Malakand	--do--
64	Mr. Hamidullah HM B-17 working on B-18 at GHS Rustam Khan Killy Ziam Charsadda	HM B-17 GHS Gonda Charsadda	--do--
65	Mr. Saleem Khan, HM B-17 working on B-18 at GHS Bakhshali Mardan	HM B-17 GHS Guli Bagh Mardan	--do--
66	Mr. Farid Shah HM BS-17 working on BS-18 at GHSS Mandoori Kohat	HM B-17 GHS Shaidan Chuntra Karak	--do--
67	Mr. Khan Gul SS Maths BS-18 GHSS Boi Abbottabad	Vice Principal BS-18 GHSS Nawansher Abbottabad	Against Vacant Post
68	Mr. Muhammad Naeem SS Economics BS-17 GHSS Lalozei Bannu Promoted to BS-18	SS Economics BS-18 GHSS Bagnotar Abbottabad	Against Vacant Post
69	Muhammad Javid Vice Principal BS-18 GHSS Pir Pai Nowshera	SS, (English) BS-18 GHSS Pir Pai Nowshera	Against Vacant Post

3. Terms & Conditions of Service in r. o. officers from Sr. No. 1 to 55 above are as under:

1. Their services will be considered regular and they will be eligible for pension/deduction of GP fund in terms of Khyber Pakhtunkhwa Civil Servants Act 1973 as amended in 2013.
2. Their services are liable to termination on one month's notice from either side. In case of resignation without notice, their one month's pay/allowances shall be forfeited to the Govt.
3. They would be on probation for period of one year extendable for another one year.
4. They will be governed by such rules and regulations as may be issued from time to time.
5. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they will be proceeded against under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 as amended from time to time.
6. Their recruitment shall be School Based and shall not be transferable to any other School.
7. The appointees should join their posts within 30 days of the issuance of this notification. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar would furnish a certificate to the effect that the candidates have joined the posts otherwise, after one month of the issuance of this Notification, failing which their candidature shall expire automatically and no subsequent appeal etc. shall be entertained.
8. Charge report should be submitted to all concerned.
9. Notification can be downloaded from our website: [www.kpese.gov.pk](http://www.kpese.gov.pk)
10. No TA/DA will be allowed to the appointees for joining their duty.

SECRETARY

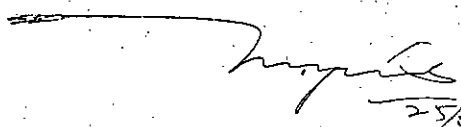
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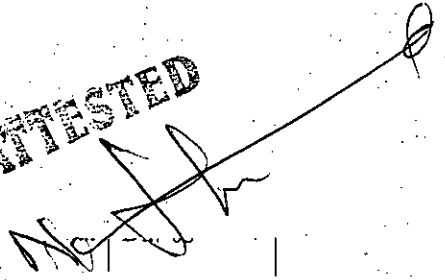
1. Accountant General, Khyber Pakhtunkhwa.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officers (Male), concerned.
4. Director (Recruitment), Khyber Pakhtunkhwa Public Service Commission.
5. District Accounts Officers concerned.

12

7. PS to Minister for E&SE Khyber Pakhtunkhwa.
8. PS to Secretary E&SE Department, Khyber Pakhtunkhwa, Peshawar.
9. PS to Special Secretary E&SE Department, Khyber Pakhtunkhwa, Peshawar.
10. Incharge EMISE E&SE Department.
11. Officers concerned.
12. Office order file.

  
25/04/15  
(MUJEEB-UR-REHMAN)  
SECTION OFFICER (SCHOOLS/MALE)

ATTESTED



District Warden, C/O Ranimullah Shopkeeper Hathian.

To,

The Secretary to Government of KPK,  
(E&SE) Department, Peshawar.

13

Through: *Proper Channel*

C

SUBJECT: APPEAL FOR WITHDRAWAL OF CONDITION NO.6  
INCLUDED IN APPOINTMENT ORDER NOTIFICATION  
NO.SO(S/M)E&SED/3-2/2014/RECRUITMENT OF  
PRINCIPALS (BS-18) (MALE) DATED 25.08.2015.

Respected Sir,

*The applicant submits as under:-*

1. That, the applicant was/is serving in regular capacity since his date of appointment dated
  2. That, the Public Service Commission Government of KPK advertised/announced vacancies of principals / vice principals BPS-18 vide its advisement No.2/2011 in press. *(Copy of advertisement is annexed as Annexure "A")*
  3. That, the applicant being eligible candidate for the said post applied through proper channel, qualified and was selected for the same.
  4. That, according to the recommendation of PSC KPK the applicant has been appointed vide order dated 25.08.2015 issued by your good office. *(Copy of appointment order is annexed as Annexure "B")*
  5. That, in the subject appointment order condition No.6 (School based appointment and non-transferable) has been imposed upon the applicant.
  6. That, the aforesaid condition was not mentioned in the advisement No.2/2011 by the Public Service Commission KPK.
  7. That, the said condition was not offered to the applicant by the competent authority before the appointment order of the applicant dated 25.08.2015.
  8. That, the above referred condition No.6 is against the Civil Servant Act, 1973 passed by the constitutional /legal / competent forum.
- That, the under reference condition is against the spirit of "appointment, promotion and transfer rules 1989".

24/8/15

APPROVED  
[Signature]

14

10. That, the said condition is not sustainable in the eye of law for a regular employee / civil servant.
11. That, the said condition No.6 is against the fundamental rights and natural justice.
12. That, if the condition No.6 remains intact then applicant would suffer irreparable loss.

*In the light of above stated facts and legal submissions it is, therefore, humbly prayed that condition No.6 of the above referred appointment order may kindly be withdrawn in the interest of justice.*

Dated: - 07/09/2015

*[Handwritten Signature]*  
...APPLICANT

ATTESTED  
*[Handwritten Signature]*







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

No. SO (S/M) E&SED/2-1/2015/Appeal against School Based Recruitment.  
Dated: Peshawar the January 20, 2016.



16

D

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

Subject: - **APPEAL FOR WITHDRAWAL OF CONDITION NO.6 INCLUDED IN APPOINTMENT ORDER NOTIFICATION NO. SO (S/M)/E&SED/3-2/2014/RECRUITMENT OF PRINCIPAL BS-18 MALE DATED: 25.08.2015**

I am directed to refer to your letter No. 2999/A-12/E-1/Appeal of Principals Dated: 22.12.2015 on the subject noted above and to state that the competent authority has regretted appeal of the applicants against condition No.6 (i.e. School Based Recruitment) in their appointment order.

sd

Encl: Even No. & Date

**(MUJEEB-UR-REHMAN)  
SECTION OFFICER (SCHOOLS/MALE)**

OFFICE OF THE DIRECTOR ELEMENTARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA, PESHAWAR

6188-6207

Encl: No. / A-12/E-1/Appeal of Principals appointed on 25.08.2015 Dated: 29/01/2016.  
Copy of the above is forwarded for information to the:-

1. ✓ Mr. Shahzada Instructor BS-18 RITE Male Thana Malakand.
2. ✓ Mr. Jehad Muhammad Vice Principal BS-18 GHS Swabi.
3. ✓ Mr. Kifayat Ullah Vice Principal BS-18 GHSS Shabaz Garhi, Mardan.
4. ✓ Mr. Shakeel Ahmed Principal BS-18 GHS Baskhshali, Mardan.
5. ✓ Mr. Taqveem ul Haq Principal BS-18 GHS Janda, Swabi.
6. ✓ Mr. Sher Muhammad Principal BS-18 GHS Kambar, Swat.
7. ✓ Mr. Ghulam Zahir Vice Principal BS-18 GHSS Wari, Dir Upper.
8. ✓ Mr. Khamsul Haq Principal BS-18 GHS Rustam Khan Killi, Charsadda.
9. ✓ Mr. Faisal Khan Vice Principal BS-18 GHSS Richben, Abbottabad.
10. ✓ Mr. Menir Khan Principal BS-18 GHS Garhi Usman Khel, Malakand.
11. ✓ Mr. Mohabat Shah Vice Principal BS-18 GHSS Munda, Dir Lower.
12. ✓ Mr. Alam Zeb Vice Principal BS-18 GHSS Khan Pur, Dir Lower.
13. ✓ Mr. Jamil ur Rehman Principal BS-18 GHS Gabasni, Swabi.
14. ✓ Mr. Muhammad Siraj Vice Principal BS-18 GHSS Urmar Payan, Peshawar.
15. ✓ Mr. Ishaq Ali Shah Principal BS-18 GHS Bagatto, Hangu.
16. ✓ Mr. Taj Wali Instructor BS-18 RITE (M), Haripur.
17. ✓ Mr. Ifan Ullah Vice Principal BS-18 GHSS Pir Pai, Nowshera.
18. P.A. to Director (E&SE) Local Directorate.

19. Sol (S/M) E&SE DEPT. w.r to ltr to ltr NO cited above.

Deputy Director (Estt:).  
Directorate of Elementary & Secondary  
Education Khyber Pakhtunkhwa, Peshawar

**ATTENDED**  
*[Signature]*



17

E

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

Dated Peshawar the September 20, 2011

**NOTIFICATION**

**NO. SO(S/M)E&SED/3-2/2007/Principals/IV. Principals (BS-18) (Male):** Consequent upon the recommendations of Khyber Pakhtunkhwa Public Service Commission Peshawar, the Competent Authority is pleased to appoint the following twenty six (26) Principals/Vice Principals (BS-18) (Male) (Rs.20000-1500-50000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government with immediate effect with terms and conditions given below:-

S #	Name/Father's Name & Address
1.	Mr. Abdul Wahab S/o Mohammad-Zarin-Shah, Village Kota-Kaila P/O Dabb Tehsil & District Karak.
2.	Mr. Abdus-Salim Khan S/o Ghulam Rahim, Village P/O & Tehsil Timargara District Dir (-) C/O Malik Jan Shop Rauf Market-1 Bazar Timargara.
3.	Mr. Arif Gul S/o Badam Gul, Village Sukar Mohalla Amirdad Khel P/O Ambadher Tehsil & District Charsadda.
4.	Mr. Fakhrud-Din S/o Hamid Ullah Khan, GHS No. 5 District D.I. Khan
5.	Mr. Jehangir Khan S/o Fazli-Rahim, Mohallah Kakero Qalla Village & P/O Turangzai Tehsil & District Charsadda.
6.	Mr. Jehangir S/o Sher Muhammad, GHS Nauthia Qadeem Peshawar Near Asif Baghi Shaheed Park.
7.	Mr. Pervaiz Iqbal S/o Mukarram Khan, Village & P/O Gulozai Tehsil & District Peshawar Dalazak Road.
8.	Syed Gul Nawab Shah S/o Syed Azeem Shah, Syed Gul Nawab Shah (S.S) GHSS No. 3 Peshawar City, Khyber Bazar Peshawar.
9.	Mr. Tahir Javed S/o Abdul Jalil Khan, House No. 796/4, Mohallah Qilla, Village & P/O Nawan Sher Abbottabad.
10.	Mr. Shah-E-Mulk S/o Muhammad Ismail, GHS, Civil Quarters, Peshawar.
11.	Mr. Farman Ullah Khan S/o Rahmat Ullah Khan, House No. 44, St No. 3, Sector No. 3, Phase-4, Hayatabad Peshawar.
12.	Mr. Hidayat Ullah S/o Inayat Ullah, Village & P/O Nawagai (Chamla) P/code 19300 Tehsil Daggar District Buner Malakand Division NWFP.
13.	Mr. Jaddi Khar S/o Feroz Khan, Mohallah Wand Khel Village Sufaid Sang P/O Shagai Thana District Peshawar.
14.	Mr. Abdul Wali Khan S/o Obaid Ullah, Village Hajizai P/O Mathra Tehsil & District Peshawar, Warsak Road Peshawar.
15.	Mr. Iftikhar Ali S/o Muhammad Yousaf, Mohalla Jana Khel Village & P/O Marghuz, Tehsil & District Swabi, NWFP, Pakistan.
16.	Mr. Muhammad Bilal S/o Muhammad Zahoor, House No. 1, Shah Qabool Colony No. 2 Namak Mandi, Peshawar.
17.	Mr. Aqal Badshah S/o Mehrab Shah, Tehsil & District Hangu P/O PTC village Khair Sha Banda C/O Riaz General Store PTC.
18.	Mr. Faqir-ud-Din S/o Muhammad Daud, House No. 584, Sector No. 4, Khalabat Town Ship Tehsil & District Haripur.
19.	Mr. Gul Shad S/o Malik Murad Khan, Regional Institute for Teacher Education (Male) Gul Bahar No. 2 Peshawar.
20.	Mr. Irshad Ahmad S/o Abdul Haye, i/c Principal GHSS Mt.sazai Peshawar.
21.	Mr. Abdul Haque S/o Abdul Hai, Buoy Model School Sakhkot Bazar Malakand Agency.
22.	Mr. Noor Hayat S/o Mohammad Ghawas, Gumbat Batkhe'la Malakand Agency.
23.	Mr. Bashir Ahmad S/o Wazir Ahmad, Village & P/O Sado Tehsil Timergara District Dir (Lower).
24.	Mr. Nawab Ali S/o Raad, Village & P/O Chakesar Tehsil Aipuri District Shangla.
25.	Mr. Ahmad-Ali S/o Gul-Said, House No. 39, Faisal Town Opposite Police Colony Nasir Bagh Road Peshawar.
26.	Mr. Amir Zaman S/o Fazal Rahman, Iqbal Medical Store Sakhkot Bazar Tehsil Dargai Malakand Agency.

**TERMS & CONDITIONS:**

18



Their services will be considered regular but without Pension & Gratuity in terms of Section-19 of the NWFP Civil Servant Act, 1973 as amended vide NWFP Civil Servants (Amendment) Act, 2005. They will however be entitled to Contributory Provident Fund in such a manner and at such rates as prescribed by the Government.

- 2- The officers who are already in Government Service and working against pensionable posts on regular basis before 1st day of July 2001, without any service break, on application to Khyber Pakhtunkhwa Public Service Commission through proper channel and selection by the Commission are appointed and allowed choice of option either to retain benefit of pension & gratuity as allowed to them under their previous terms of appointment or to avail the benefit of Contributory Provident Fund allowed to them under new appointment.
- 3- Their services are liable to termination on one month's notice from either side. In case of resignation without notice, their one month's pay/allowances shall be forfeited to the Government.
- 4- The appointees should join their posts within 30-days of the issuance of this notification. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar would furnish a certificate to the effect that the candidates have joined the posts otherwise, after one month of the issuance of this Notification, failing which their candidature will expire automatically and no subsequent appeal etc shall be entertained.
- 5- They would be on probation for a period of one year extendable for another one year.
- 6- They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 7- Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they will be proceeded against under the NWFP Removal from Service (Special Powers) Ordinance, 2000 and the Rules framed from time to time.
- 8- Charge report should be submitted to all concerned.
- 9- No TA/DA will be allowed to the appointees for joining their duty.

**Secretary to Govt. of Khyber Pakhtunkhwa  
Elementary & Secondary Education  
Department**

Endst: of even No & Date.

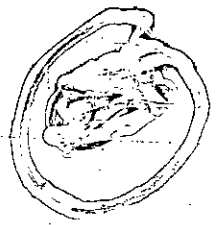
Copy forwarded to the:

1. PS to Minister E&SE, Khyber Pakhtunkhwa.
2. PS to Chief Secretary, Khyber Pakhtunkhwa.
3. PS to Secretary, E&SE, Department, Khyber Pakhtunkhwa.
4. Accountant General, Khyber Pakhtunkhwa Peshawar.
5. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
6. District Accounts Officers concerned.
7. Executive District Officer E&SE concerned.
8. Director Recruitment, Khyber Pakhtunkhwa, Public Service Commission Peshawar.
9. PA to Additional Secretary, E&SE, Deptt.
10. PA to Deputy Secretary (Admn), E&SE Deptt.
11. Officers concerned.
12. Office order file.

*Mujeeb-ur-Rehman*  
**(MUJEEB-UR-REHMAN)  
SECTION OFFICER (SCHOOLS/MALE)**

**REGISTERED**

19



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

**OFFICE ORDER.**

Mr. Sharafat Ali SST (Gen) GHS Opal is hereby transferred & posted against vacant post of SST (Gen) at GCMHS Chekesar District Shangla in his own pay & BPS in the interest of public service with immediate effect.

Note:-

1. Charge report should be submitted to all concerned.
2. No TA/DA etc are allowed.


Endst: No. 1116-18 / F.No. 07/Vol-111/SST (M) Transfers.

**DIRECTOR**

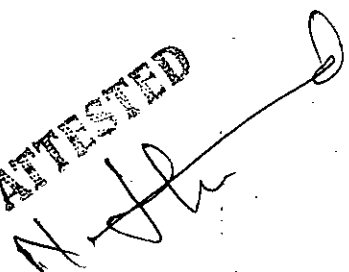
Dated Peshawar the 11/5/2015

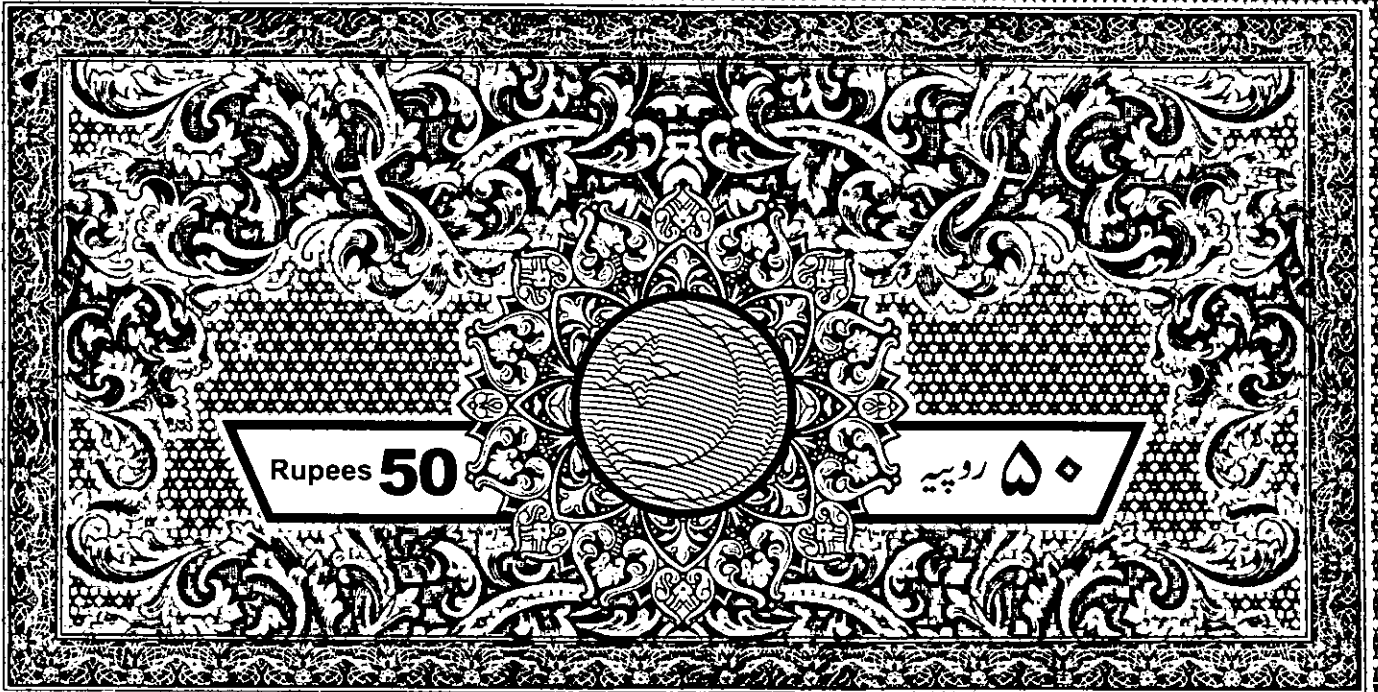
Copy of the above is to the:-

1. District Education Officers (M) Shangla.
2. District Accounts Officer Shangla.
3. Principals concerned.
4. SST concerned.
5. PA to Director (E&SE) Khyber Pakhtunkhwa, Peshawar.
6. Master File.

  
Deputy Director (Estab)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa

**ATTESTED**





### SPECIAL POWER OF ATTORNEY

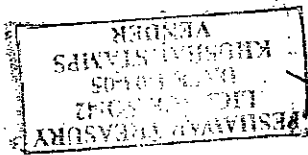
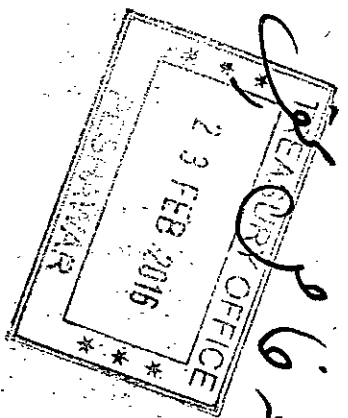
By this special power of attorney, we,

1. Shahzada instructor BS-18 RITE Male Thana Malakand.
2. Sher Muhammad Principal BS-18 GHS Kambar, Swat.
3. Ghulam Zahir Vice Principal BS-18 GHSS Wari, Dir Upper.
4. Khamsul Haq Principal BS-18 GHS Rustam Khan Kalli Charsadda.
5. Faisal Khan Vice Principal BS-18 GHSS Richben, Abbotabad.
6. Alam Zeb Vice Principal BS-18 GHSS Khan Pur, Dir Lower.
7. Jamil Ur Rehman Principal BS-18 GHS Gabasni, Swabi.
8. Muhammad Siraj Vice Principal BS-18, GHSS, Urmar Payan, Peshawar.
9. Ishaq Ali Shah Principal BS-18 GHS Bagatto, Hangu.
10. Taj Wali Instructor BS-18 RITE(M), Haripur.
11. Irfan Ullah Vice Principal BS-18 GHSS Pir Pai, Nowshera.
12. Sana Ul Haq son of Shams Ul Haq resident of Village Srikh Maorzai Tehsil Shabqadar, Charsadda.
13. Sher Yazdan S/o Abdul Dayan, resident of Village Kurivi P.O. Taru Jaba Tehsil & District Nowshera.
14. Sarfaraz Nathaniel S/O B-Nathaniel Alizabeth Girls School and College Dabgari Garden, Peshawar.
15. Muhammad Irfan Son of Faqir Gul resident of 159 Durrani House C/O Charsadda Medicos Street No.6, Taj Abad Town, P.O. Peshawar University.
16. Ghulam Raziq Son of Fazli Raziq resident of Skhi Maina P.O. Akbar Pura, Tehsil & district Nowshera.
17. Sardar Muhammad son of Mirza Khan resident of Village & P.O. Aza Khel Payan, Tehsil & District Nowshera.

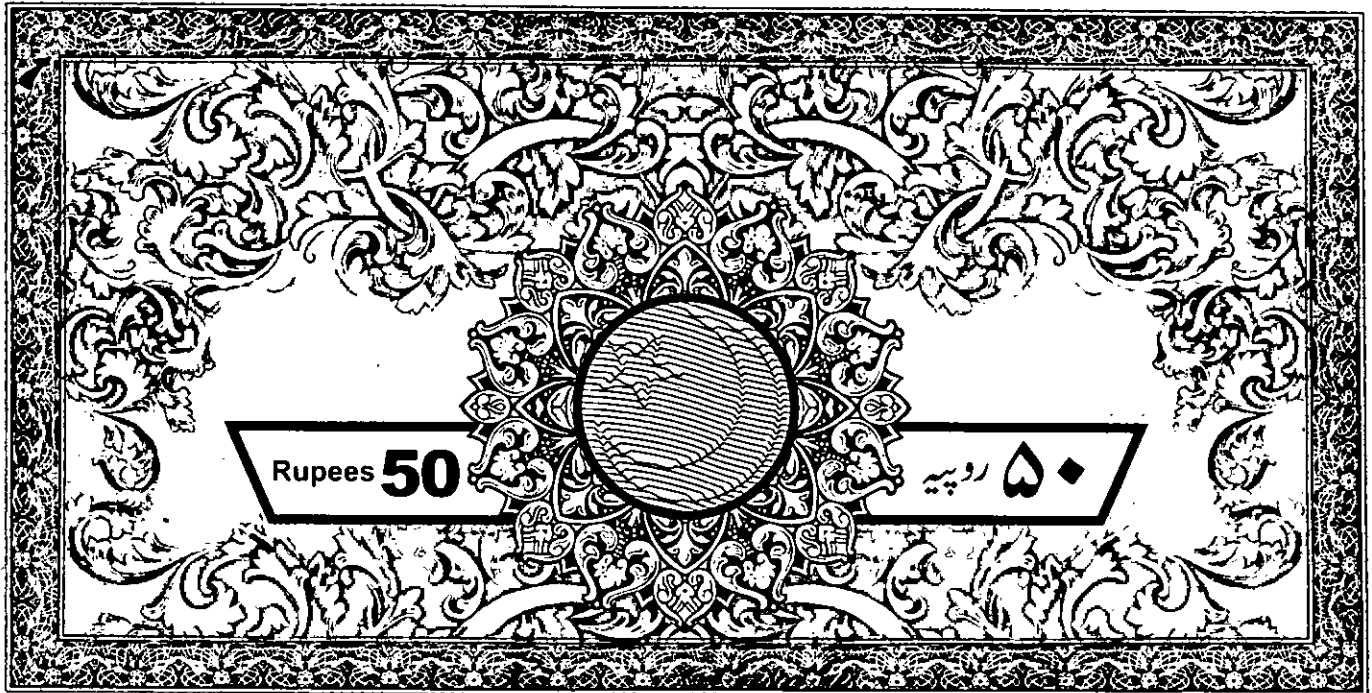
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مجلس التفتيش والرقابة

24-216



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18. Waqar Khan son fo Sifat Ullah Resident of Village & P.O. Masho Khel,  
Kandi Fateh Khan Khel, Tehsil & District Peshawar.
19. Amir Zeb son of Mustafa Kamal GHS Rustam P.O. Rustam, Mardan.
20. Muhammad Javid Vice Principal BS-189 GHSS Pir Pai Nowshera.

do hereby state that a case titled as "Shahzada Etc Versus Govt of KPK etc" in the court of Honourable Services Tribunal Khyber Pakhtunkhwa, Peshawar, as we are busy in performance of our official duties and other activities, therefore we want to appoint and authorize, constitute one of our representative namely Khamsul Haq Principal BS-18 GHS Rustam khan Kalli Charsadda as our special attorney and authorize him to do as under in our name and on our behalf and under his own signatures: -

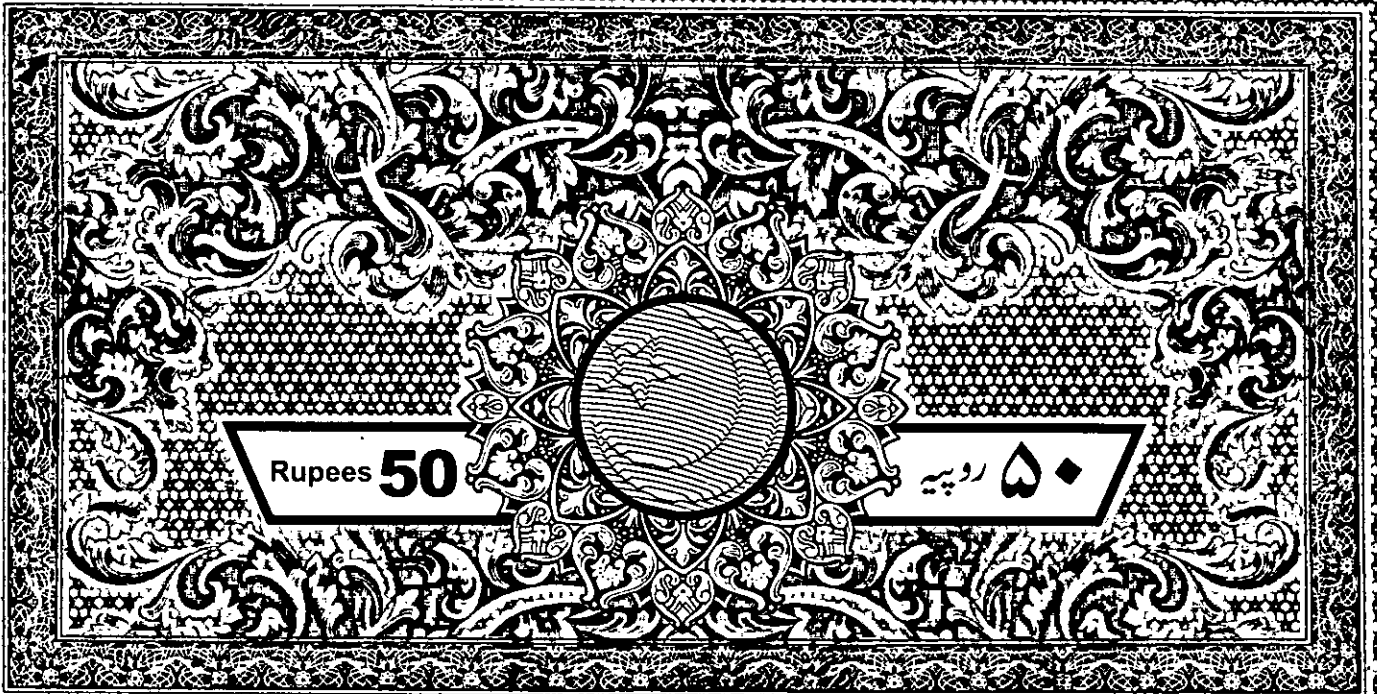
1. To appear on our behalf before any court of law including Civil, Sessions, Services Tribunal, High Courts, Supreme Court of Pakistan, any authority including Tax authority, Customs authority, Cantonment Board, in any case, to sign all the documents, papers and things to appoint advocates for the case to withdraw powers from him and to appoint others to record statements of witnesses and to produce any documentary evidence or proof and to do all the attendance in the concerned courts of law and to do all the need full in that connection. To give statements on our behalf.
2. To file appeal, review, revisions, leave to appeal, writs, applications, misc. applications, statements, written statement and all other deeds and things, right from the original court to appellate, revisional, High court and Supreme Court of Pakistan, or any other authority, to sign all the deeds and things to appoint advocates for any Court of law / Authority and to do the needful in that connection.
3. To do all the other acts, deeds and things which are not specifically mentioned here but which shall be needed to be

PESHAWAR TREASURY  
LICENCE NO: 42  
DATE 1-03-05  
KHUSHAL STAMPS  
VENDOR

TREASURY OFFICE  
23 FEB 2016  
PESHAWAR

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*24-016*





done legally and in legal faith in accordance with the circumstances of the cases.

So in witness whereof this special power of attorney is executed to remain as proof and be used at the time of need.

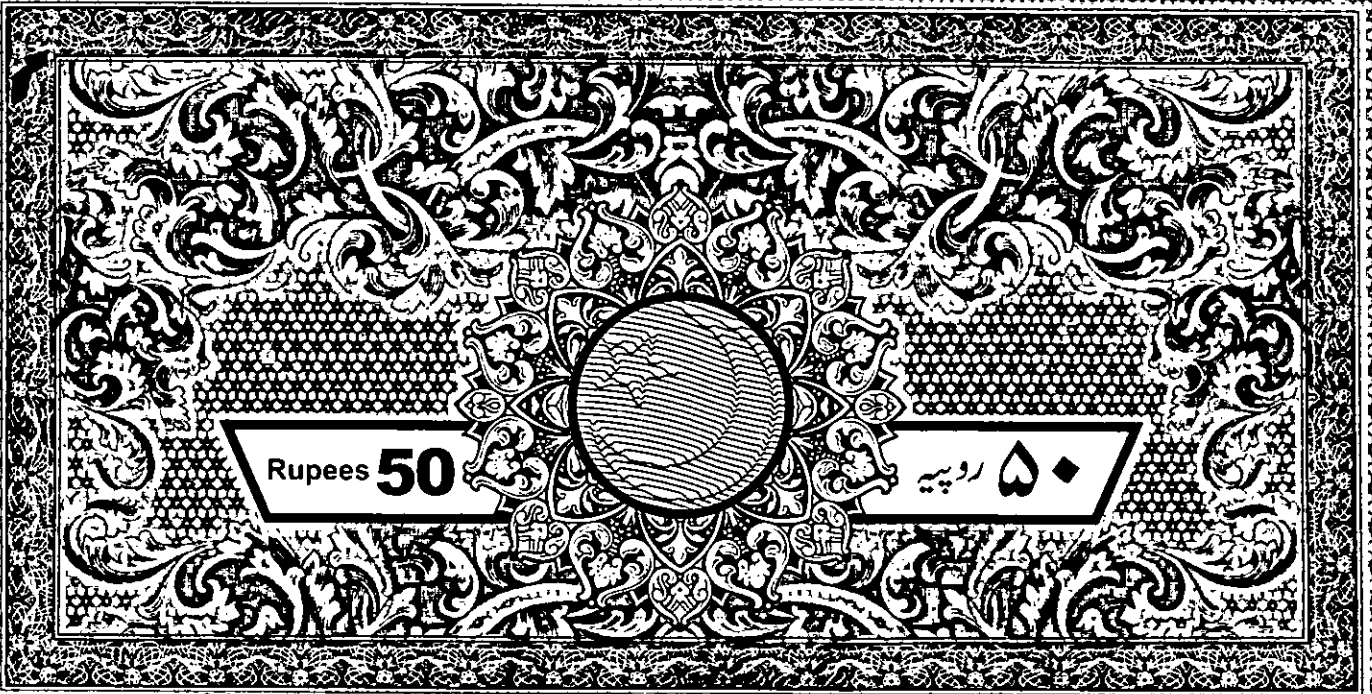
#### EXECUTANTS

- |                        |                      |                                 |
|------------------------|----------------------|---------------------------------|
| 1. Shahzada            | <u>شہزادہ</u>        | CNIC No. <u>15402-2918885-1</u> |
| 2. Sher Muhammad       | <u>شیر محمد</u>      | CNIC No. <u>15503-7693647-7</u> |
| 3. Ghulam Zahir        | <u>غلام ظاہر</u>     | CNIC No. <u>15305-0158754-5</u> |
| 4. Khamsul Haq         | <u>خمصل الحق</u>     | CNIC No. <u>17301-691328-5</u>  |
| 5. Faisal Khan         | <u>فیصل خان</u>      | CNIC No. <u>13302-5285994-5</u> |
| 6. Alam Zeb            | <u>الام زب</u>       | CNIC No. <u>17101-202054-2</u>  |
| 7. Jamil Ur Rehman     | <u>جمیل رحمان</u>    | CNIC No. <u>15602-0373434-5</u> |
| 8. Muhammad Siraj      | <u>محمد سراج</u>     | CNIC No. <u>17301-6545413-3</u> |
| 9. Ishaq Ali Shah      | <u>اشاق علی شاہ</u>  | CNIC No. <u>17301-5980831-7</u> |
| 10. Taj Wali           | <u>تاج ولی</u>       | CNIC No. <u>17301-1570443-5</u> |
| 11. Irfan Ullah        | <u>عرفان اللہ</u>    | CNIC No. <u>17301-257044-7</u>  |
| 12. Sana Ul Haq        | <u>سنا علی</u>       | CNIC No. <u>17101-4267283-9</u> |
| 13. Sher Yazdan        | <u>شیر یزدان</u>     | CNIC No. <u>17201-2092826-7</u> |
| 14. Sarfaraz Nathaniel | <u>سرفراز نثانیل</u> | CNIC No. <u>17301-1439635-5</u> |
| 15. Muhammad Irfan     | <u>محمد عرفان</u>    | CNIC No. <u>17301-2871014-9</u> |
| 16. Ghulam Raziq       | <u>غلام رازیق</u>    | CNIC No. <u>17201-4267283-9</u> |

PESHAWAR TREASURY  
LICENCE NO. 42  
DATE 19-03  
KHUSHAL STAMPS  
VENDOR

TREASURY OFFICE  
23 FEB 2016  
PESHAWAR

*J. J. J.*  
24-02



17. Sardar Muhammad سردار محمد

CNIC No. 17201-2128695-5

18. Waqar Khan وقار خان

CNIC No. 17301-1440559-3

19. Amir Zeb. عامر زب

CNIC No. 16101-1224596-3

20. Muhammad Javid محمد جاوید

CNIC No. 17101-0254444-9

21. Muhammad Ihsan Shah احسان شاہ

CNIC No. 21202-2989772-9

ACCEPTED BY

*m/ky*

Khamsur Haq  
CNIC # 17301-6913284-5

*Bisrat*

WITNESSES

1. W. I. Shah

2. M. I. Khan

W. I. Shah

M. I. Khan

CNIC # 21201-4283214-5

CNIC # 17301-3075983-1

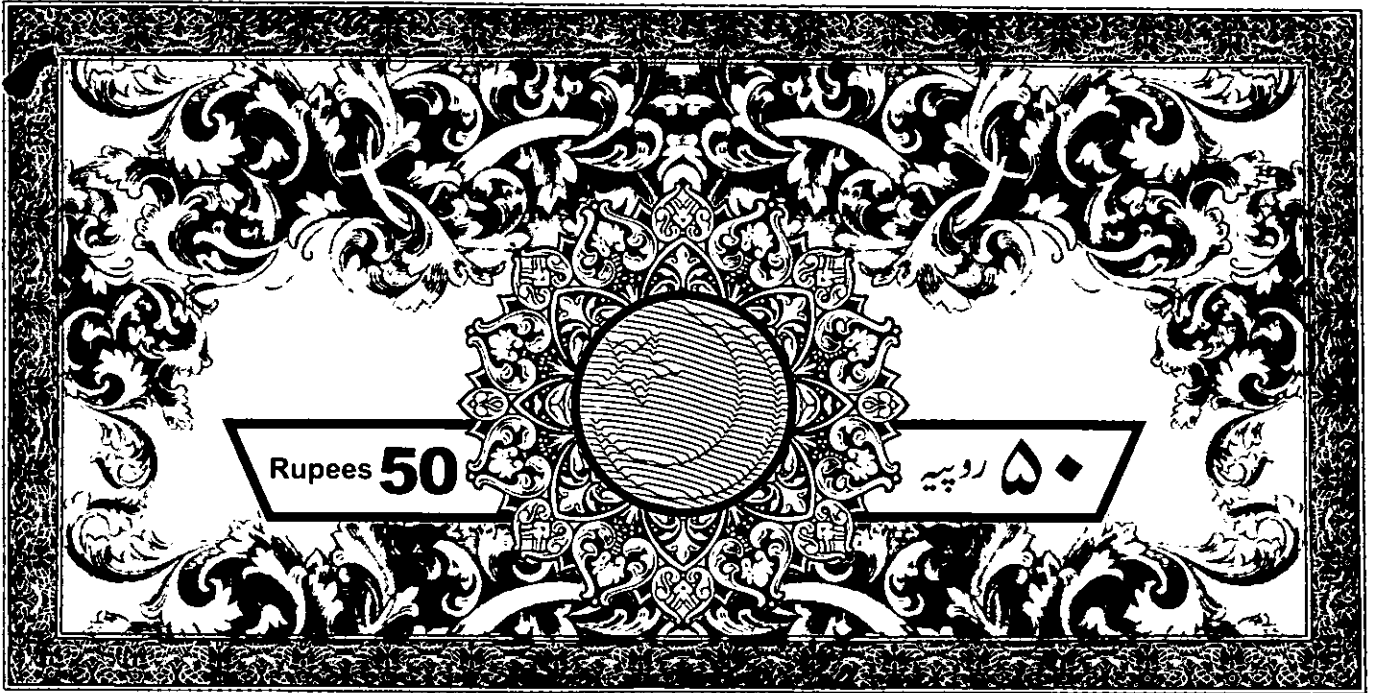
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LIC. NO. 42  
DATE: 03-03-09  
KUSHTAL STAMPS  
VENDOR

TREASURY OFFICE  
23 FEB 2016  
PESHAWAR

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Rupees **50** ۵۰ روپیہ



PESHAWAR TREASURY  
LICENCE NO. 42  
DATE 1/1/15  
KHOSRA STAMPS  
PESHAWAR

TREASURY OFFICE  
23 FEB 2016  
PESHAWAR

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24-2/16

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

Service Appeal No: 178/2016

**Khamsul Haq Principal BPS-18GHS Rustam Khan Killi, Charsadda Appellant.**

**VERSUS**

Secretary E&SE Department, Khyber Pakhtunkhwa & others.

..... Respondents

**JOINT PARAWISE COMMENTS FOR & ON BEHALF OF RESPONDENTS No: 1-4&6.**

Respectfully Sheweth :-

The Respondents submit as under:-

**PRELIMINARY OBJECTIONS.**

- 1 That the Appellant has got no cause of action locus / standi .
- 2 That the instant Service Appeal is badly time barred.
- 3 That the Appellant has concealed material facts from this Honorable Tribunal.
- 4 That the instant service appeal is based on mala fide intentions.
- 5 That the Appellant has not come to this Honorable Tribunal with clean hands.
- 6 That the instant Service Appeal is against the prevailing law & rules.
- 7 That the Appellant has been treated as per law, rules & policy.
- 8 That the appeal is not maintainable in its present form.
- 9 That the appeal is bad for mis-joinder & non-joinder of the necessary parties.
- 10 That the instant Service Appeal is barred by law.
- 11 That the Appellant is not competent to file the instant appeal against the respondents.
- 12 That the Notification dated 25/8/2015, is legally competent & is liable to be maintained.
- 13 That the school based adjustment of the appellant is in accordance with the Notification dated 30/4/2014 of the Respondent No: 2.

**FACTS**

- 1 That Para-1, needs no comments, being pertain to the service record of the appellant.
- 2 That Para-2 is correct to the extent that the Public Service Commission Govt: of KPK has announced /advertised 67 posts of Principal BPS-18 in E&SE Department vide advertisement No: 02/2011 on its Web site (copy of the same is annexure -A).
- 3 That Para-3 is correct. Hence needs no comments .
- 4 That Para-4 is correct to the extent that the appellant has been recommended by the KPK Public Service Commission against the Principal BPS-18 posts & on the basis of the said recommendations, he has been adjusted against the said post vide the impugned Notification dated 25/8/2015 on regular basis & with immediate effect with the following terms & conditions vide Para-6 which says that their recruitment shall be school based & shall not be transferable to any other school. (Copy of the Notification No: SO(PE) 4-5/Meeting/2014/Teaching Cadre/ date 30/4/2014 is Annexure-B).

- 5 That Para-5 is incorrect & denied . The condition of school based recruitment vide Para-6 of the impugned Notification dated 25/8/2015 is in accordance with the Notification dated 30/4/2014, wherein vide selection criteria of S/No: 1 it has clearly being mentioned that appointments through initial recruitment on adhoc shall be made through merit on school base. Hence, the plea of the appellant is illegal & without any justification as the Respondents have acted as per law, rules & policy in the instant case. (Copy of the same is already annexed as Annexure-B).
- 6 That Para-6 is correct that the appellant has filed a Departmental; Appeal before the competent authority which has been rejected vide order dated 29/01/2016, by the Respondent No:2 of being without any force & merit by the Respondent No: 2(Copy of the said are annexures-C&D).
- 7 That Para-7 is correct to the extent that the Respondent Department has rejected the Departmental Appeal of the appellant of being merit less & without any legal force . Hence the Respondents further submit on the following grounds inter alia :-

**GROUNDS**

- A Incorrect & not admitted. The condition of Para-6 in the impugned Notification dated 25/8/2015 of the Respondent No: 2 is in accordance to the Notification dated 30/4/2014 . (Hence the plea of the appellant is without any legal force & is liable to be dismissed.
- B Incorrect & not admitted. The statement f the appellant is against the law, rules & circumstance of the case. Hence deserves to be rejected.
- C Incorrect & not admitted. The condition of Para-6 of the terms & conditions of the impugned Notification dated 25/8/2015 is in accordance with law, rules & policy.
- D Incorrect & not admitted. The Respondents have acted as per law, rules & policy in the instant case in terms of Notification dated 30/4/2014, wherein, vide Para-6 the conditions of school based recruitment / adjustment has been made applicable upon the appellant in the interest of students community .
- E Incorrect & not admitted. No such appointment vide Notification dated 03/2/2007, wherein the condition of school based has been ignored. However the Respondents are bound to follow the instructions & policy of the Govt: in recruitment & adjustment process of a Civil Servants as adopted in the present case of the appellant.
- F The Respondents also seek leave of this Honorable Tribunal to raise additional grounds at the time of arguments.

In view of the above made submissions, it is requested that this Honorable Tribunal may very graciously be pleased to dismiss the instaut service appeal with cost in favour of the Respondent Department.

  
Secretary

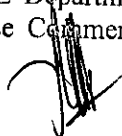
E&SE Department Khyber  
Pakhtunkhwa, Peshawar  
(Respondents No:1&2)

  
Director

E&SE Department Khyber  
Pakhtunkhwa, Peshawar.  
(Respondents No: 3,4,6&7)

**AFFIDAVIT**

I Khaista Rehman Asstt: Director (Litigation-II) E&SE Department do hereby solemnly affirm and declare that the contents of the instant Parawise Comments are true & correct to the best of my knowledge & belief.

  
Deponent



(A) 6 17

**KHYBER PAKHTUNKHWA PUBLIC SERVICE COMMISSION**

2- Fort Road Peshawar, Cantt.

Website: [www.kppsc.gov.pk](http://www.kppsc.gov.pk)

Tele: Nos. 091-9214134, 9213533, 9213750, 9212897

Dated: 07.04.2011

**ADVERTISEMENT No. 02 / 2011.**

Applications, on prescribed form, are invited for the following posts from Pakistani citizens having domicile of Khyber Pakhtunkhwa / F.A.T.A by 07.05.2011 (candidates applying from abroad by 21.05.2011). Incomplete applications and applications without supporting documents required to prove the claim of the candidates shall be rejected without intimation to the candidates.

<b>AGRICULTURE, LIVESTOCK &amp; CO-OPERATIVE DEPTT:</b>	
1.	<p><b>FIVE (05) POSTS OF FEMALE LIVESTOCK PRODUCTION OFFICER (HEALTH) IN L&amp;DD DEPTT:</b></p> <p><b>QUALIFICATION:</b> (i) B.Sc (Hons) Animal Husbandry from a recognized University; OR (ii) Doctor of Veterinary Medicine (DVM) or equivalent qualification in veterinary sciences from a recognized university and registered with Pakistan Veterinary Medical Council.</p> <p><b>AGE LIMIT:</b> 22 to 35 years. <b>PAY SCALE:</b> BPS-17 <b>ELIGIBILITY:</b> Female.</p> <p><b>ALLOCATION:</b> Two to Zone-1 and One each to Zone-2, 3 and 5.</p>
2.	<p><b>THREE (03) POSTS OF SOIL CONSERVATION ASSISTANT</b></p> <p><b>QUALIFICATION:</b> (a) M.Sc Agriculture (Soil Science) from a recognized University; OR (b) B.Sc (Hons) Agriculture with Soil Science as major subject obtained after four years of academic instructions after F.Sc from a recognized university; OR (c) B.Sc Agriculture Engineering from a recognized university.</p> <p><b>AGE LIMIT:</b> 21 to 35 years. <b>PAY SCALE:</b> BPS-17 <b>ELIGIBILITY:</b> Both Sexes.</p> <p><b>ALLOCATION:</b> One each to Merit, Zone-1 and 5.</p>
3.	<p><b>ONE (01) POST OF BIO-CHEMIST</b></p> <p><b>QUALIFICATION:</b> Doctor of Veterinary Medicine (DVM) or equivalent qualification in veterinary sciences with M.Sc in Biochemistry or M.Sc (Hons) in Animal Husbandry recognized by Pakistan Veterinary Medical Council.</p> <p><b>AGE LIMIT:</b> 25 to 32 years. <b>PAY SCALE:</b> BPS-17 <b>ELIGIBILITY:</b> Both Sexes.</p> <p><b>ALLOCATION:</b> Merit.</p>
<b>C &amp; W DEPARTMENT</b>	
4.	<p><b>THIRTEEN (13) POSTS OF JUNIOR SCALE STENOGRAPHER.</b></p> <p><b>QUALIFICATION:</b> (i) Intermediate or equivalent qualification from recognized a Board. (ii) A speed of 60 words per minute in Shorthand in English and 35 words per minute in</p>



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5. ONE (01) POST OF DATA ENTRY OPERATOR.

QUALIFICATION: (i) 2<sup>ND</sup> Division FA/ F.Sc with one year Diploma in Computer Science from a recognized Institute. (ii) Speed of Ten Thousand Key Depression per hour for punching data entry verification.

AGE LIMIT: 18 to 30 years. PAY SCALE: BPS-11 ELIGIBILITY: Both Sexes  
ALLOCATION: Zone-1.

*ELEMENTARY AND SECONDARY EDUCATION DEPTT:*

6. SIXTY SEVEN (67) POSTS OF PRINCIPAL/ VICE PRINCIPAL

QUALIFICATION: Master Degree with M.Ed/ M.A. (Education) or equivalent qualification from a recognized university with nine years teaching/ administrative experience in recognized Secondary School/ Higher Secondary School.

Note: - The teaching experience will be counted after acquiring Master Degree in one of the general subjects or M.Ed.

AGE LIMIT: 25 to 40 years. PAY SCALE: BPS-18 ELIGIBILITY: Male  
ALLOCATION: Merit

7. TWENTY FIVE (25) POSTS OF HEADMASTER

QUALIFICATION: Master Degree with B.Ed/ M.Ed/ M.A. (Education) or equivalent qualification from a recognized university and five years teaching experience in High/ Middle School owned or recognized by the Government.

Note: - The teaching experience will be counted after acquiring Master Degree in one of the general subjects or M.Ed.

AGE LIMIT: 25 to 40 years. PAY SCALE: BPS-17 ELIGIBILITY: Male  
ALLOCATION: Six to Merit, Four each to Zone-1, 2, 3 and 5 and three to Zone-4.

*ENVIRONMENT DEPARTMENT*

8. FIVE (05) POSTS OF SUB DIVISIONAL FOREST OFFICER IN FOREST DEPTT:

QUALIFICATION: Master Degree in Forestry from a recognized university/ institution or Second Class Bachelor Degree in Forestry from a recognized university/ institute or Second Class Bachelor's Degree in Agriculture or other Science subjects from a recognized university/ institute.

AGE LIMIT: 21 to 32 years. PAY SCALE: BPS-17 ELIGIBILITY: Male  
ALLOCATION: One each to Merit, Zone-1, 2, 3 and 4.

9. FOUR (04) POSTS OF ASSISTANT DIRECTOR FISHERIES (INCLUDING ONE LEFT OVER POST OF ZONE-5).

QUALIFICATION: Master Degree in Fisheries or M.Sc Zoology preferably with specialization in Fisheries/ Fresh Water Biology from a recognized university.

AGE LIMIT: 21 to 35 years. PAY SCALE: BPS-17 ELIGIBILITY: Male  
ALLOCATION: One each to Zone-2, 3, 4 and 5.

10. ONE (01) POST OF ASSISTANT RESEARCH OFFICER/ EXTENSION FIELD OFFICER IN FISHERIES

QUALIFICATION: M.Sc Zoology/ Fisheries preferably with specialization in Fisheries/

*Handwritten signature and notes in the right margin.*

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- (i) Age shall be reckoned on 07.05.2011. Maximum age limit as prescribed in the recruitment rules shall be relaxed upto 10 years for Govt Servants who have completed 2 years continuous service and upto 3 years for candidates belonging to backward areas specified in the appendix attached to the NW.P Initial Appointment to Civil Posts (Relaxation of Upper Age Limit) Rules, 2006. However, a candidate shall be allowed relaxation in age in one of the above categories provided that the candidates from backward areas, in addition to automatic relaxation of three years shall be entitled to one of the relaxations available to Govt Servants, general or disabled candidates, whichever is relevant and applicable to them.
- (ii) Degrees / Diploma / Experience Certificates / Testimonials of unrecognized Institution are not accepted. Only original Degrees / Certificates are accepted. However, the candidates can apply on provisional certificate signed by the Controller of Examination of the respective Institution but candidates shall produce original degrees / certificates before their selection. Detail Marks Certificates for all the examinations shall necessarily be required and these should be attached with the application forms.
- (iii) Ex-armed Forces Personnel must send copy of Discharge Certificate with their applications. Govt. / Semi Govt. / Autonomous / Semi Autonomous Bodies employees may apply direct but their Departmental Permission Certificates should reach within 30 days of the closing date.
- (iv) Applications should be on the prescribed application form obtainable from the listed below branches of the NATIONAL BANK OF PAKISTAN. Application Fee is Rs.285/- (Rupees Two Hundred Eighty Five only) for all the candidates. In addition to the application fee, the candidates will have to pay Rs. 5/- (rupees fifteen only) on account of Bank Charges. Separate application form will be required for each advertised category of posts. Application forms obtained other than the specified branches of the National Bank will be considered invalid and such applications will not be entertained. The applications on plain paper or Photostat shall not be accepted. Incomplete and late applications shall also be ignored.
- (v) Applications must be submitted within time as no extra time is allowed for postal transit. The applications if submitted on the last date for receipt of applications must reach the Commission's office by the closing hours.
- (vi) Applicants married to Foreigners are considered only on production of the Govt. Relaxation Orders.
- (vii) No applicant shall be considered in absentia on paper qualifications unless he/she possesses exceptionally higher qualifications than the minimum prescribed qualification for a particular post(s).
- (viii) Govt. reserves the right not to fill any or fill more or less than the advertised post(s).
- (ix) Candidates who have already availed three chances by physical appearance before the Commission and have failed for the post(s) having one and the same qualifications and scale of pay shall be ineligible.
- (x) Experience wherever prescribed shall be counted after the minimum qualifications for the post(s), if not specifically provided otherwise against the advertised post(s).
- (xi) In case the number of applications of candidates is disproportionately higher than the number of posts, short listing will be made in anyone of the following manner :-
  - (a) Written Test in the Subject.
  - (b) General Knowledge or Psychological General Ability Test.
  - (c) Academic and/or Professional record as the Commission may decide.

*[Handwritten Signature]*  
Registrar  
Sikandar Khan  
Associate High Court



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GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

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Dated Peshawar the August 25, 2015

NOTIFICATION

NO.SO(S)/ME&SED/3-2/2014/Recruitment of Principal (BS-18) (Male):- Consequent upon recommendations of Khyber Pakhtunkhwa Public Service Commission Peshawar, the Competent Authority is pleased to appoint the following fifty five (55) candidates of Teaching Cadre as Principals (BS-18) Male (Rs.25940-1950-64940) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government with immediate effect on the terms and conditions as given below:-

Sr. #	Name, Father Name and Address	Domicile/ Zone
1	Mr. Alam Zeb, S/O Jehan Zeb, Yousaf Zai Medical Store Hospital Road Timergara Tehsil Timergara Dir Lower.	Dir/ 03
2	Mr. Anis-ur-Rehman, S/O Toti Rehman, Moh: Ambar Cham District P.O and Tehsil Dir Upper.	Dir/ 03
3	Mr. Arif Ullah Khan S/O Ghulam Jan, Village and P.O Shahbaz Khel Tehsil & District Lakki Marwat.	Lakki Marwat/ 04
4	Mr. Aurang Zaib S/O Jahan Zen, House No.94 Sector No.4 Mohallah Darband Kalabat Town Ship Tehsil & District Haripur.	Haripur/ 05
5	Mr. Faisal Khan S/O Missal Khan, C/O Star Hardware and Paint Store, Main Bazar Havelian Tehsil Havelian Distt: Abbottabad.	Abbottabad/ 05
6	Mr. Ghulam Raziq S/O Fazli Raziq Village Zakhi Miana P.O Akbar Pura Tehsil & District Nowshera.	Nowshera/ 02
7	Mr. Ghulam Zahir S/O Ghulam Farooq Village & P.O Bishgram Tehsil Lal Qilla District Dir Lower.	Dir/ 03
8	Hafiz Shams-ur-Rehman S/O Ahmed Ali, C/O Moulvi Ahmad Ali General Store Hospital Road P.O Sarai Naurang Lakki Marwat.	Lakki Marwat/ 04
9	Mr. Hayat Ullah S/O Shams-ul-Qamar, Mohallah Pinda Khel P.O Charsadda Town Teh & District Charsadda.	Charsadda/ 02
10	Mr. Hikmatullah S/O Ali Muhammad C/O Yousaf Medicose Hospital road Sarai Naurang P.O Sarai Naurang Tehsil Sarai Naurang Distt: Lakki Marwat.	Lakki Marwat/04
11	Mr. Intiaz Ali S/O Allah Dad Regional Institute of Teachers Education (Male) Haripur.	Haripur/ 05
12	Mr. Inayat-ul-Haq S/O Lutfullah, C/O Doctor Ihsan-ul-Haq Al-Noor Medical Complex near Allaho-akbar Mosque Saidu Sharif Swat.	Shangla/03
13	Mr. Irfanullah S/O Amin Ullah House # 850, Sadiq Abad Gul Dara Chowk P.O Namak Mandi Kakshal Peshawar.	Dir/ 03
14	Mr. Ishaq Ali Shah S/O Muhib Ali Shah Village and P.O Urmar Payan Tehsil & District Peshawar.	Peshawar/ 02
15	Mr. Jamil-ur-Rehman S/O Said Akbar Khan Village & P.O Pabaini Tehsil & District Swabi.	Swabi/ 02
16	Mr. Jihad Muhammad S/O Shamsul Muhammad Mohallah Zakarya Khail village & P.O Kaddi Tehsil & Distt: Swabi.	Swabi/ 02
17	Mr. Kamal-ud-Din S/O Khesrow C/O Qamarudin Chatrali Mohd Dad Near Masjid Babus Salam Dabgari Peshawar.	Chitral/ 03
18	Mr. Khams-ul-Haq S/O Mian Habib Jan, Village Panam Dheri P.O Mathra Tehsil & Distt: Peshawar.	Peshawar/ 02
19	Mr. Khan Afsar S/O Mir Afzal, Tanawal Book Depott: Cantt: Bazar Abbottabad.	Abbottabad/ 05
20	Mr. Khurshid Alam S/O Qamar Zaman, Village & P.O Dheri Allahdand Moh: Azikhel Tehsil Batkhela District Malakand.	Malakand/ 03
21	Mr. Khurshid Khan S/O Mian Jan, Govt. Higher Secondary School Takht Bhai. District Mardan.	Mardan/ 02
22	Mr. Majeed Ullah S/O Gul Mulla, Village and P.O Hathian Teh Takht Bhai District Mardan. C/O Rahimullah Shopkeeper Hathian.	Dir/ 03

Sr. #	Name, Father Name and Address	Domicile/ Zone
55	Mr. Shamsul Hadi S/O Mufassir Khan C/O Gulab Stationary Mart Near MCB Bank Battagram, District Battagram.	Battagram/ 03
56	Mr. Tariq Jamal S/O Saïd Jamal, House No.440 Street No.10 Sector "R" Sheikh Maltoon Town Mardan.	Mardan/ 02.

2. Consequent upon their appointment as Principal BS-18, they are posted on positions and stations as noted against each:

S.#	Name, Father's Name and Addresses	Domicile/ Zone	Posted as	Remarks
1.	Mr. Alamzeb S/O Jehanzeb, Yousaf Medical Store Hopital Road Timergara Tehsil Timergara Dir Lower	Dir /03	Vice Principal B-18 GHSS Khan Pur Dir Lower	Against Vacant Post
2.	Mr. Anis Ur Rehman, S/O Toti Rehman, Mohallah Ambar Cham District PO and Tehsil Dir Upper	Dir /03	Principal B-18 GHSS Kulandi Dir Upper	--do--
3.	Mr. Arif Ullah Khan S/O Ghulam Jan, Village and PO Shahbaz Khel Tehsil and District Lakki Marwat	Lakki Marwat/04	Principal B-18 GHS Ranwal Tank	--do--
4.	Mr. Aurangzeb S/O Jehanzeb, House No.94 Sector No.4 Mohallah Darband Kalabat Town Ship Tehsil and District Haripur	Haripur/ 05	Principal B-18 GHS Sector No.3 KT Ship Haripur	Vice Serial No.56
5.	Mr. Faisal Khan S/O Misal Khan, C/O Star Hardware and Paint Store Main Bazar Havelian Tehsil Havelian District Abbottabad	A.A/05	Principal B-18 GHS Namal Abbottabad	Against Vacant Post
6.	Mr. Ghulam Raziq S/O Fazli Raziq, Village Sakhi Maina PO Akbar Pura Tehsil and District Nowshera	NSR/02	Vice Principal B-18 GHSS Rashaki Nowshera	--do--
7.	Mr. Ghulam Zahir S/O Ghulam Farooq Village and PO Bishgram Tehsil Lal Qilla District Dir Lower	Dir /03	Vice Principal B-18 GHSS Wari Dir Upper	--do--
8.	Mr. Hafiz Shamsur Rehman S/O Ahmad Ali C/O Molvi Ahmad Ali General Store Hopital Road PO Sarai Naurang Lakki Marwat	Lakki Marwat/04	Principal B-18 GHS Gara Baloch Tank	--do--
9.	Mr. Hayatullah S/O Shams Ul Qamar Mohallah Painsa Khel PO Charsadda Town Tehsil and District Charsadda	Chd/02	Principal B-18 GCMHS Turangzai Charsadda	--do--
10.	Mr. Hikmatullah S/O Ali Muhammad C/O Yousaf Medicose Hospital Road Sarai Naurang PO Sarai Naurang Tehsil Sarai Naurang District Lakki Marwat	Lakki Marwat/04	Principal B-18 GHS Harama Tala Lakki Marwat	--do--
11.	Mr. Imtiaz Ali S/O Allah Dad RITE (M) Haripur	Haripur /05	Principal B-18 GHSS Kahal Haripur	--do--
12.	Mr. Inayat Ul Haq S/O Lutfullah C/O Dr. Ihsanul Haq Al-Noor Medical Complex near Allaha Akbar Mosque Saidu Sharif Swat	Shangla /03	Vice Principal B-18 GHS Sandovi Shangla	--do--
13.	Mr. Irfan Ullah S/O Amin Ullah House No.850 Sadiq Abad Gul dara Chowk PO Nimak Mandi Kakshal Peshawar	Dir /03	Vice Principal BS-18 GHSS Pir Pai Nowshera.	Vice Sr. No. 69
14.	Mr. Ishaq Ali Shah S/O Mohib Ali Shah Village and PO Urmur Payan Tehsil and District Peshawar	Peshawar /02	Principal B-18 GHS Bagatoo Hangu	--do--
15.	Mr. Jamil Ur Rehman S/O Said Akbar Khan Village and PO Pabini Tehsil and District Swabi	Swabi/02	Principal B-18 GHSS Kalu Khan Swabi	--do--
16.	Mr. Jehad Muhammad S/O Shams Ul Muhammad Mohallah Zakria Khel Village. and PO Kaddi Tehsil and District Swabi	Swabi/02	Vice Principal B-18 GHS Swabi	--do--

S.#	Name, Father's Name and Addresses	Domicile/ Zone	Posted as	Remarks
17.	Mr. Kamal Ud Din S/O Khesrow C/O Qamar Ud din Chitral Mohallad Dad Near Masjid Balas Salam Dabguri Peshawar	Chitral/03	Vice Principal B-18 GCMHS Chitral	Vice Serial No.57
18.	Mr. Khams Ul Haq S/O Mian Habib Jan Village Panam Dheri PO Mathra Tehsil and District Peshawar	Peshawar /02	Principal B-18 GHS Rustam Khan Killy Zaim Charsadda	Vice Serial No.64
19.	Mr. Khan Afsar S/O Mir Afzal Tanwal Book Depott Cant Bazar Abbottabad	A.A/05	Principal BS-18 GHS Kutwal Abbottabad	Against Vacant Post
20.	Mr. Khurshid Alam S/O Qamar Zaman Village and PO Dheri Allah Dhand Mohallah Azikhel Tehsil Batkhela District Malakand	Malakand/ 03	Instructor B-18 RITE(M) Thana Malakand	--do--
21.	Mr. Khurshid Khan S/O Mian Jan GHSS Takht Bhai District Mardan	Mardan/02	Principal GHS Takhbhai Mardan	Vice Serial No.59
22.	Mr. Majeed Ullah S/O Gul Mulla Village and PO Hathian Tehsil Takht Bhai District Mardan C/O Rahim Ullah Shopkeeper Hathian	Dir/03	Vice Principal B-18 GHS Kot Malakand	Against Vacant Post
23.	Mr. Mohabat Shah S/O Arif Ullah Jan C/O Tajik Book Depott Main Bazar Timergara Dir Lower	Dir /03	Vice Principal B-18 GHSS Munda Dir Lower	--do--
24.	Muhammad Ibrahim S/O Daud Khan Mohallah Walayat Khel Via Shahbaz Village and PO Tordher Tehsil Lahor District Swabi	Swabi/02	Vice Principal B-18 GHS Tordher No.1 Swabi	--do--
25.	Muhammad Ihsan Shah S/O Syed Daulat Shah C/O Janbad Shah Chemist and Druggist Jamrud Bazar Khyber Agency	Khyber Agency/01	Service placed at the disposal of Director of Education (FATA)	FATA
26.	Muhammad Irfan S/O Faqir Gul 159 Durani House C/O Charsadda Medicose Street No.6 Tajabad Town PO Peshawar University	Peshawar/02	Vice Principal BS-18 GHSS.Sherpao Charsada	Vice Sr. No. 62
27.	Muhammad Javed Khan S/O Hukmat Khan Village and PO Shabqadar Azim Khan Qilla Tehsil shabqadar District Charsadda	Charsadda/02	Principal B-18 GHS Zarbab Garhi Charsadda	Vice Serial No.58
28.	Muhammad Saddique S/O Halim Shah C/O Lub Gas Agency Tehsil Road Karak	Karak/04	Principal B-18 GHSS Mandori Kohat.	Vice Serial No.66
29.	Muhammad Siraj S/O Muhammad Ashraf House No.5261/E Mohallah Kander Kohat Road Bhana Mari Peshawar	Peshawar/02	Vice Principal B-18 GHSS Urmar Payan Peshawar	Against Vacant Post
30.	Mr. Munir Khan S/O Zarif Khan ,Rehman General Store Aziz Market Dargai Bazar Malakand	Malakand/03	Principal B-18 GHS Ghari Usmani Khel Malakand	Vice Sr. 61
31.	Mr. Riaz Ud Din S/O Mohay Ud Din , Village Gosam Tehsil Munda District Dir Lower	Bajour Agency /01	Services placed at the disposal of Director of Education	FATA
32.	Mr. Safir Ullah Khan S/O Ruck nud Din , Village Las Garhi Bosti Khel Dara Adam Khel FR Kohat	FR Peshawar/01	Services placed at the disposal of Director of Education	FATA
33.	Mr. Sajad Elahi S/O Imam Din , C/O Waheed Cloth House Sohrab Market Balakot District Mansehra	Mansehra /05	Vice Principal B-18 GHSS Jareed Mansehra	Against Vacant Post
34.	Mr. Sajad Ahmad S/O Muhammad Ayub , GCMHS No.3 Mansehra	Mansehra/05	V/Principal B-18 GHSS No.1 Mansehra	--do--
35.	Mr. Sana Ul Haq S/O Shams Ul Haq, Village and PO Sriki Marozai Tehsil Shabqadar District Charsadda	Charsadda/02	Instructor B-18 RITE (M) Mardan	--do--
36.	Mr. Saqib Tanvir S/O Shakhi Muhammad Tanvir, 10 Civil Lines Jail Road D.I.Khan	D.I.Khan/04	Instructor B-18 RITE (M) D.I.Khan	--do--

S.#	Name, Father's Name and Addresses	Domicile/ Zone	Posted as	Remarks
37.	Mr. Sardar Muhammad S/O Mirza Khan, Village and PO Aza Khel Payan Tehsil and District Nowshera	Nowshera/02	Vice Principal B-18 GHS Lahore-Swabi	Against Vacant Post
38.	Syed Zulfiqar Ali S/O Syed Ali Bahader Shah, Village and PO Nawagai Tehsil Mandran District Buner	Buner/03	Vice Principal B-18 GHSS Nawagai Buner	--do--
39.	Mr. Shafiqat Hussain S/O Muhammad Ashraf, C/O Irshad Shopkeeper near Makki Masjid Link Road Abbottabad	Abbottabad/05	Principal B-18 GHS Namli Mera Abbottabad	--do--
40.	Mr. Shahzada S/O Haider Khan, Village and PO Dheri Allahdhand Mohallah Mirash Khel Malakand	Malakand/03	Instructor B-18 RITE (M) Thana Malakand	--do--
41.	Mr. Sher Muhammad S/O Shams Ur Rehman, Village and PO Chakesar Tehsil Chakesar District Shangla	Shangla /03	Principal B-18 GHS Qambar Swat	--do--
42.	Mr. Sher Yazdan S/O Abdul Dayan, Village Kurvi PO Taru Jabba Tehsil and District Nowshera	Nowshera/02	Principal B-18 GHS Dagi Banda Nowshera	--do--
43.	Mr. Taj Wali S/O Maqbali, Village Sufaid Sang Mohallah Wadan Khel PO Shagai Bazar Tehsil and District Peshawar	Peshawar/02	Instructor B-18 RITE (M) Haripur	--do--
44.	Mr. Taqweem Ul Haq S/O Abdur Raziq, House No.F-46 Right Bank Colony Turbela Dam Tehsil Topi District Swabi	Swabi/02	Principal B-18 GHS Jhanda Swabi	--do--
45.	Mr. Waqar Khan S/O Sifat Ullah, Village and PO Mashokhel Kandi Fateh Khan Khel Tehsil and District Peshawar	Peshawar/02	Instructor B-18 RITE (M) Kohat	--do--
46.	Mr. Zahoor Khan S/O Abdul Qayum Khan, Village Garhi Mali Khel PO Badber Tehsil and District Peshawar	Peshawar /02	Principal B-18 GHS Sowarian Mardan	Vice Sr. No. 63
47.	Mr. Amir Zeb S/O Mustafa Kamal, GHS Rustam PO Rustam District Mardan	Mardan /02	Vice Principal B-18 GHSS Khair Abad Mardan	Against Vacant Post
48.	Mr. Asim Saeed S/O Muhammad Saeed, Basti Ustarana North near boys Primary School D.I.Khan	D.I.Khan/04	Principal B-18 GHS Himmat D.I.Khan	--do--
49.	Mr. Kifayat Ullah S/O Rafi Ullah Khan, Village and PO Mayar Mohallah Amukhel Tehsil and District Mardan	Mardan/02	Vice Principal B-18 GHSS Shah Baz Ghari Mardan	--do--
50.	Mr. Munhamir Khan S/O Gul Rehman, Village and PO Gandaf Mohallah Shabi Khel Tehsil Topi District Swabi	Swabi/02	Vice Principal B-18 GHSS Kabgani Swabi	--do--
51.	Mr. Saif Ur Rehman S/O Sultan Khan, HM GHS Mandew Bannu	Lakki Marwat/04	Principal B-18 GHSS Amandi Umar Khan Bannu	--do--
52.	Mr. Sarfaraz Nathaniel S/O B-Nathaniel, Alizbeth Girls School and College Dabgari Garden Peshawar	Peshawar /02	Instructor B-18 PITE Peshawar	--do--
53.	Mr. Shakeel Ahmad S/O Mehtab Khan, GHS No.2 Bicket Gunj Mardan	Mardan /02	Principal B-18 GHS Bakhshali Mardan	Vice Sr. 65
54.	Mr. Shams Ul Hadi S/O Musafar Khan, C/O Gulab Stationery Mart near MCB Battagram	Battagram/03	V/Principal B-18 GHSS Karori Mansehra	Against Vacant Post
55.	Mr. Tariq Jamal S/O Said Jamal, House No.440 Street No.10 Sector - R Sheikh Maltoon Town Mardan	Mardan/02	Principal BS-18 GHS Qasim Toru Mardan	--do--

CONSEQUENTIAL TRANSFER/ADJUSTMENT

Sr.#	Name and Designation	Consequential-Proposed Posting	Remarks
56	Mr. Jamil Khan, HM B-17 working on B-18 at GHS Sector No.3 KT Ship Haripur	HM B-17 GHS Laban Bandi Haripur	Against Vacant Post
57.	Mr. Mir Wali Khan, HM B-17 Shopkeeper Hattian.	HM B-17 GHS Shahdour Chitral	--do--

	Takkar Mardan	Malakand	
61	Mr. Nek Muhammad HM B-17 working on B-18 at GHS Garhi Usmani Khel Malakand	HM B-17 GHS Prangai Malakand	--do--
62	Basharat Ullah HM BS-17 working on BS-18 GHSS Sherpao Charsadda	HM B-17 GHS Kula Dhand Charsadda	--do--
63	Nasir Ahmad SS Phy BS-18 working as Principal BS-18 GHS Sowarian Mardan	SS Phy BS-18 GHSS Ghani Dheri Malakand	--do--
64	Mr. Hamidullah HM B-17 working on B-18 at GHS Rustam Khan Killy Ziam Charsadda	HM B-17 GHS Gonda Charsadda	--do--
65	Mr. Saleem Khan, HM B-17 working on B-18 at GHS Bakhshali Mardan	HM B-17 GHS Guli Bagh Mardan	--do--
66	Mr. Farid Shah HM BS-17 working on BS-18 at GHSS Mandoori Kohat	HM B-17 GHS Shaidan Chuntra Karak	--do--
67	Mr. Khan Gul SS Maths BS-18 GHSS Boi Abbottabad	Vice Principal BS-18 GHSS Nawansher Abbottabad	Against Vacant Post
68	Mr. Muhammad Naeem SS Economics BS-17 GHSS Lalozi Bannu Promoted to BS-18	SS Economics BS-18 GHSS Bagnotar Abbottabad	Against Vacant Post
69	Muhammad Javid Vice Principal BS-18 GHSS Pir Pai Nowshera	SS (English) BS-18 GHSS Pir Pai Nowshera	Against Vacant Post

3. Terms & Conditions of Service in r. o. officers from Sr. No. 1 to 55 above are as under:

1. Their services will be considered regular and they will be eligible for pension/deduction of GP fund in terms of Khyber Pakhtunkhwa Civil Servants Act 1973 as amended in 2013.
2. Their services are liable to termination on one month's notice from either side. In case of resignation without notice, their one month's pay/allowances shall be forfeited to the Govt.
3. They would be on probation for period of one year extendable for another one year.
4. They will be governed by such rules and regulations as may be issued from time to time.
5. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they will be proceeded against under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 as amended from time to time.
6. Their recruitment shall be School Based and shall not be transferable to any other School.
7. The appointees should join their posts within 30 days of the issuance of this notification. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar would furnish a certificate to the effect that the candidates have joined the posts otherwise, after one month of the issuance of this Notification, failing which their candidature shall expire automatically and no subsequent appeal etc. shall be entertained.
8. Charge report should be submitted to all concerned.
9. Notification can be downloaded from our website: [www.kpese.gov.pk](http://www.kpese.gov.pk)
10. No TA/DA will be allowed to the appointees for joining their duty.

SECRETARY

Endst: of even No. & Date

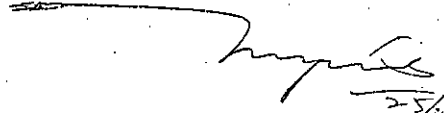
Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officers (Male), concerned.
4. Director (Recruitment), Khyber Pakhtunkhwa Public Service Commission.
5. District Accounts Officers concerned.



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7. PS to Minister for E&SE Khyber Pakhtunkhwa.
8. PS to Secretary E&SE Department, Khyber Pakhtunkhwa, Peshawar.
9. PS to Special Secretary E&SE Department, Khyber Pakhtunkhwa, Peshawar.
10. Incharge EMISE E&SE Department.
11. Officers concerned.
12. Office order file.

  
25/01/15  
(MUJEEB-UR-REHMAN)  
SECTION OFFICER (SCHOOLS/MALE)

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(C)

GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT



Peshawar, dated the 30th April, 2014. ✓

NOTIFICATION

NO. 001/5/Meeting/2014/Teaching Cadre:-

On approval of the Competent Authority in supersession of all issued in this behalf, the Elementary and Secondary Education Department on the, Selection Criteria and other conditions specified below which shall to all the posts to be filled on adhoc school- based. Method of qualifications has already circulated.

Selection Criteria

Appointment through initial recruitment on adhoc shall be made through Merit on School base.

For selection of suitable candidate by initial recruitment, Total 200 marks shall be distributed in the following manner:-

- (a) Screening Test conducted by Independent third party(NTS)= 100 Marks
- (b) Academic Qualification = 100 Marks

The 100 marks will be further distributed as under:-

Category of Qualification	(Total marks 100)
	Marks obtained X 20 / total marks = _____
	Marks obtained X 20 / total marks = _____
	Marks obtained X 20 / total marks = _____
Professional qualification	Marks obtained X 15/ total marks = _____
for posts	Marks obtained X 15/ total marks = _____
MA Edu	Marks obtained X 5/ total marks = _____
PhD	Marks obtained X 5/ total marks = _____

Case 4 year BS programme/BSs Hon if equivalent to Master Degree shall be calculated as marks obtained X 35 (20 for BA/BSc + 15 for MA/Msc)/Total marks

Case 2 year MA Edu without B.Ed his marks shall be calculated as under:-  
Marks obtained X 20/Total marks = \_\_\_\_\_

After announcement of results of screening test by Independent third party the concerned appointing authority shall add the marks obtained in the screening Test conducted by Independent Third Party with the marks reserved for qualification as above and scrutinize and verify the documents and make the appointment as per prescribed rules.

The concerned appointing authority shall ensure that the documents of the candidate are verified. Degrees and Certificates issued by the Public Sector Universities, BISEs or recognized / affiliated Universities by the Higher Education Commission, Islamabad will be considered.  
Verification fee will be borne by the candidates.

The merit list prepared by the concerned appointing authority shall be displayed ten days to receive the objections/appeals, if any, and then the appointment orders will be issued after making corrections.

In case any document(s) is/are found fake or forged or bogus on such scrutiny or verification, a case against him/her shall be registered.

Obtaining of 50% marks in the NTS Test is removed. The candidates who have applied for more than one school and stood first position in one school his appointment will be made in that school. In case a candidate stood first positions

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in more than one schools, his appointment will be made in a school where a chance of appointment to other highest scorer be given.

Candidates who have applied against Minority quota for SST posts and appeared in the NTS test should submit their certificates to the concerned DEO. A separate merit list will be prepared against their 3 % reserved quota. Similarly, the candidates who have applied against disable quota for SST posts and appeared in the NTS test should submit their certificates along with disability certificate as required under the rules to the concerned DEO. A separate merit list will be prepared against their 2 % reserved quota and appointments will be made accordingly.

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

Endst : of even No & date:

1. The Secretary to Government of Khyber Pakhtunkhwa, Establishment and Administration Department Peshawar.
2. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department Peshawar.
3. The Secretary to Government of Khyber Pakhtunkhwa, Law Department Peshawar.
4. The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.
5. The Accountant General Khyber Pakhtunkhwa Peshawar.
6. The Director, Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
7. The Director of Education (FATA) Peshawar.
8. The Director, Curriculum and Teacher Education Khyber Pakhtunkhwa Abbottabad.
9. The Director, (PITE) Khyber Pakhtunkhwa Peshawar.
10. The Director, ESRU Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
11. Manager Government Printing Press Khyber Pakhtunkhwa Peshawar.
12. The Deputy Director, EMIS (S&SE) Department Khyber Pakhtunkhwa Peshawar.
13. All District Education Officer (M&F) in Khyber Pakhtunkhwa.
14. All District Account Officer in Khyber Pakhtunkhwa.
15. All Agency Education Officer in FATA.
16. All Agency Account Officer in FATA.
17. PS to Governor Khyber Pakhtunkhwa. Peshawar.
18. PS to Chief Minister Khyber Pakhtunkhwa. Peshawar.
19. PS to Chief Secretary Khyber Pakhtunkhwa. Peshawar.
20. PS to Minister E&SE Khyber Pakhtunkhwa. Peshawar.
21. PS to Secretary E&SE Khyber Pakhtunkhwa. Peshawar.
22. Master file

  
SECTION OFFICER  
(Primary)

To,

The Secretary to Government of KPK  
(E&SE) Department, Peshawar.

Through: Proper Channel

SUBJECT: APPEAL FOR WITHDRAWAL OF CONDITION NO.6  
INCLUDED IN APPOINTMENT ORDER NOTIFICATION  
NO.SO(S/M)E&SED/3-2/2014/RECRUITMENT OF  
PRINCIPALS (BS-18) (MALE) DATED 25.08.2015.

Respected Sir,

The applicant submits as under:-

1. That, the applicant was/is serving in regular capacity since his date of appointment dated
2. That, the Public Service Commission Government of KPK advertised/announced vacancies of principals / vice principals BPS-18 vide its advisement No.2/2011 in press. (Copy of advertisement is annexed as Annexure "A")
3. That, the applicant being eligible candidate for the said post applied through proper channel, qualified and was selected for the same.
4. That, according to the recommendation of PSC KPK the applicant has been appointed vide order dated 25.08.2015 issued by your good office. (Copy of appointment order is annexed as Annexure "B")
5. That, in the subject appointment order condition No.6 (School based appointment and non-transferable) has been imposed upon the applicant.
6. That, the aforesaid condition was not mentioned in the advisement No.2/2011 by the Public Service Commission KPK.
7. That, the said condition was not offered to the applicant by the competent authority before the appointment order of the applicant dated 25.08.2015.
8. That, the above referred condition No.6 is against the Civil Servant Act, 1973 passed by the constitutional / legal competent forum.
9. That, the under reference condition is against the spirit of "appointment, promotion and transfer rules 1939".

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10. That, the said condition is not sustainable in the eye of law for a regular employee / civil servant.
11. That, the said condition No.6 is against the fundamental rights and natural justice.
12. That, if the condition No.6 remains in fact then applicant would suffer irreparable loss.

*in the light of above stated facts and legal submissions it is, therefore, humbly prayed that condition No.6 of the above referred appointment order may kindly be withdrawn in the interest of justice.*

Dated:- 07/09/2015

*[Signature]*  
...APPLICANT



(E)

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GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

No. SO (S/M) E&SED/2-1/2015/Appeal against School Based Recruitment.  
Dated: Peshawar the January 20, 2016.

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

Subject: - APPEAL FOR WITHDRAWAL OF CONDITION NO.6 INCLUDED IN APPOINTMENT ORDER NOTIFICATION NO. SO (S/M)/E&SED/3-2/2014/RECRUITMENT OF PRINCIPAL BS-18 MALE DATED: 25.08.2015

I am directed to refer to your letter No. 2999/A-12/E-1/Appeal of Principals dated 22.12.2015 on the subject noted above and to state that the competent authority has decided in favor of the applicants against condition No.6 (i.e. School Based Recruitment) in their respective orders.

sd

(MUJEEB-UR-REHMAN)  
SECTION OFFICER (SCHOOLS/MALE)

File No. & Date

OFFICE OF THE DIRECTOR ELEMENTARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA, PESHAWAR

6188-6207

A-12/E-1/Appeal of Principals appointed on 25.08.2015 Dated: 29/01/2016.

Copy of the above is forwarded for information to the:-

- ✓ Mr. Shabzada Instructor BS-18 RITE Male Thana Malakand.
- ✗ Mr. Shahid Muhammad Vice Principal BS-18 GHS Swabi.
- ✗ Mr. Kifayat Ullah Vice Principal BS-18 GHSS Shabaz Garhi, Mardan.
- ✗ Mr. Shokeel Ahmed Principal BS-18 GHS Baskhshali, Mardan.
- ✗ Mr. Taqviom ul Haq Principal BS-18 GHS Janda, Swabi.
- ✓ Mr. Sher Muhammad Principal BS-18 GHS Kamar, Swat.
- ✓ Mr. Gulam Zahir Vice Principal BS-18 GHSS Wari, Dir Upper.
- ✓ Mr. Khamsul Haq Principal BS-18 GHS Rustam Khan Killi, Charsadda.
- ✓ Mr. Faisal Khan Vice Principal BS-18 GHSS Richben, Abbottabad.
- ✗ Mr. Munir Khan Principal BS-18 GHS Garhi Usman Khel, Malakand.
- ✗ Mr. Mohiuddin Shah Vice Principal BS-18 GHSS Munda, Dir Lower.
- ✓ Mr. Aamir Zeb Vice Principal BS-18 GHSS Khan Pur, Dir Lower.
- ✓ Mr. Jamil ur Rehman Principal BS-18 GHS Gabasni, Swabi.
- ✓ Mr. Muhammad Siraj Vice Principal BS-18 GHSS Urmar Payan, Peshawar.
- ✓ Mr. Ishaq Ali Shah Principal BS-18 GHS Bagatto, Hangu.
- ✓ Mr. Taj Wali Instructor BS-18 RITE (M), Haripur.
- ✓ Mr. Hafiz Ullah Vice Principal BS-18 GHSS Pir Pai, Nowshera.

19 SO(S/M) E&SE DEPT W/2 to LWS letter NO cited above.

Deputy Director (Estt.)  
Directorate of Elementary & Secondary  
Education Khyber Pakhtunkhwa, Peshawar

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

Service Appeal No: 179/2016

**Faisal Khan V/Principal(BPS-18) GHSS Richben Abbott Abad .... Appellant.**

**VERSUS**

Secretary E&SE Department, Khyber Pakhtunkhwa & others.

..... Respondents

**JOINT PARAWISE COMMENTS FOR & ON BEHALF OF RESPONDENTS No: 1-4&6.**

Respectfully Sheweth :-

The Respondents submit as under:-

**PRELIMINARY OBJECTIONS.**

- 1 That the Appellant has got no cause of action locus / standi .
- 2 That the instant Service Appeal is badly time barred.
- 3 That the Appellant has concealed material facts from this Honorable Tribunal.
- 4 That the instant service appeal is based on mala fide intentions.
- 5 That the Appellant has not come to this Honorable Tribunal with clean hands.
- 6 That the instant Service Appeal is against the prevailing law & rules.
- 7 That the Appellant has been treated as per law, rules & policy.
- 8 That the appeal is not maintainable in its present form.
- 9 That the appeal is bad for mis-joinder & non-joinder of the necessary parties.
- 10 That the instant Service Appeal is barred by law.
- 11 That the Appellant is not competent to file the instant appeal against the respondents.
- 12 That the Notification dated 25/8/2015, is legally competent & is liable to be maintained.
- 13 That the school based adjustment of the appellant is in accordance with the Notification dated 30/4/2014 of the Respondent No: 2.

**FACTS**


- 1 That Para-1, needs no comments, being pertain to the service record of the appellant.
- 2 That Para-2 is correct to the extent that the Public Service Commission Govt: of KPK has announced /advertised 67 posts of Principal BPS-18 in E&SE Department vide advertisement No: 02/2011 on its Web site (copy of the same is annexure -A).
- 3 That Para-3 is correct. Hence needs no comments .
- 4 That Para-4 is correct to the extent that the appellant has been recommended by the KPK Public Service Commission against the Principal BPS-18 posts & on the basis of the said recommendations, he has been adjusted against the said post vide the impugned Notification dated 25/8/2015 on regular basis & with immediate effect with the following terms & conditions vide Para-6 which says that their recruitment shall be school based & shall not be transferable to any other school. (Copy of the Notification No: SO(PE) 4-5/Meeting/2014/Teaching Cadre/ date 30/4/2014 is Annexure-B).


5. That Para-5 is incorrect & denied . The condition of school based recruitment vide Para-6 of the impugned Notification dated 25/8/2015 is in accordance with the Notification dated 30/4/2014, wherein vide selection criteria of S/No: 1 it has clearly being mentioned that appointments through initial recruitment on adhoc shall be made through merit on school base. Hence, the plea of the appellants is illegal & without any justification as the Respondents have acted as per law, rules & policy in the instant case. (Copy of the same is already annexed as Annexure-B).
6. That Para-6 is correct that the appellant has filed a Departmental; Appeal before the competent authority which has been rejected vide order dated 29/01/2016, by the Respondent No:2 of being without any force & merit by the Respondent No: 2(Copy of the said are annexures-C&D).
7. That Para-7 is correct to the extent that the Respondent Department has rejected the Departmental Appeal of the appellant of being merit less & without any legal force . Hence the Respondents further submit on the following grounds inter alia :-

**GROUNDS**

- A. Incorrect & not admitted. The condition of Para-6 in the impugned Notification dated 25/8/2015 of the Respondent No: 2 is in accordance to the Notification dated 30/4/2014 . (Hence the plea of the appellants is without any legal force & is liable to be dismissed.
- B. Incorrect & not admitted. The statement of the appellant is against the law, rules & circumstance of the case. Hence deserves to be rejected.
- C. Incorrect & not admitted. The condition of Para-6 of the terms & conditions of the impugned Notification dated 25/8/2015 is in accordance with law, rules & policy.
- D. Incorrect & not admitted. The Respondents have acted as per law, rules & policy in the instant case in terms of Notification dated 30/4/2014, wherein, vide Para-6 the conditions of school based recruitment / adjustment has been made applicable upon the appellants in the interest of students community .
- E. Incorrect & not admitted. No such appointment vide Notification dated 03/2/2007; wherein the condition of school based has been ignored. However the Respondents are bound to follow the instructions & policy of the Govt; in recruitment & adjustment process of a Civil Servants as adopted in the present case of the appellant.
- F. The Respondents also seek leave of this Honorable Tribunal to raise additional grounds at the time of arguments.

In view of the above made submissions, it is requested that this Honorable Tribunal may very graciously be pleased to dismiss the instant service appeal with cost in favour of the Respondent Department.

  
 Secretary  
 E&SE Department Khyber  
 Pakhtunkhwa, Peshawar  
 (Respondents No:1&2)

  
 Director  
 E&SE Department Khyber  
 Pakhtunkhwa, Peshawar.  
 (Respondents No: 3,4,6&7)

**AFFIDAVIT**

I Khaista Rehman Asstt: Director (Litigation-II) E&SE Department do hereby solemnly affirm and declare that the contents of the instant Parawise Comments are true & correct to the best of my knowledge & belief.

  
 Dependent



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

Service Appeal No: 180/2016

**Ghulam Zahir V/Principal BPS-18 GHSS Wari Dir (Upper) .... Appellant.**

**VERSUS**

Secretary E&SE Department, Khyber Pakhtunkhwa & others. .... Respondents

**JOINT PARAWISE COMMENTS FOR & ON BEHALF OF RESPONDENTS No: 1-4&6.**

Respectfully Sheweth :-

The Respondents submit as under:-

**PRELIMINARY OBJECTIONS.**

- 1 That the Appellant has got no cause of action locus / standi .
- 2 That the instant Service Appeal is badly time barred.
- 3 That the Appellant has concealed material facts from this Honorable Tribunal.
- 4 That the instant service appeal is based on mala fide intentions.
- 5 That the Appellant has not come to this Honorable Tribunal with clean hands.
- 6 That the instant Service Appeal is against the prevailing law & rules.
- 7 That the Appellant has been treated as per law, rules & policy.
- 8 That the appeal is not maintainable in its present form.
- 9 That the appeal is bad for mis-joinder & non-joinder of the necessary parties.
- 10 That the instant Service Appeal is barred by law.
- 11 That the Appellant is not competent to file the instant appeal against the respondents.
- 12 That the Notification dated 25/8/2015, is legally competent & is liable to be maintained.
- 13 That the school based adjustment of the appellant is in accordance with the Notification dated 30/4/2014 of the Respondent No: 2.

**FACTS**

- 1 That Para-1, needs no comments, being pertain to the service record of the appellant.
- 2 That Para-2 is correct to the extent that the Public Service commission Govt: of KPK has announced /advertised 67 posts of Principal BPS-18 in E&SE Department vide advertisement No: 02/2011 on its Web site (copy of the same is annexure -A).
- 3 That Para-3 is correct. Hence needs no comments .
- 4 That Para-4 is correct to the extent that the appellant has been recommended by the KPK Public Service Commission against the Principal BPS-18 posts & on the basis of the said recommendations, he has been adjusted against the said post vide the impugned Notification dated 25/8/2015 on regular basis & with immediate effect with the following terms & conditions vide Para-6 which says that their recruitment shall be school based & shall not be transferable to any other school. (Copy of the Notification No: SO(PE) 4-5/Meeting/2014/Teaching Cadre/ date 30/4/2014 is Annexure-B).

- 5 That Para-5 is incorrect & denied . The condition of school based recruitment vide Para-6 of the impugned Notification dated 25/8/2015 is in accordance with the Notification dated 30/4/2014, wherein vide selection criteria of S/No: 1 it has clearly being mentioned that appointments through initial recruitment on adhoc shall be made through merit on school base. Hence, the plea of the appellants is illegal & without any justification as the Respondents have acted as per law, rules & policy in the instant case. (Copy of the same is already annexed as Annexure-B).
- 6 That Para-6 is correct that the appellant has filed a Departmental; Appeal before the competent authority which has been rejected vide order dated 29/01/2016, by the Respondent No:2 of being without any force & merit by the Respondent No: 2(Copy of the said are annexures-C&D).
- 7 That Para-7 is correct to the extent that the Respondent Department has rejected the Departmental Appeal of the appellant of being merit less & without any legal force . Hence the Respondents further submit on the following grounds inter alia :-

**GROUND**

- A Incorrect & not admitted. The condition of Para-6 in the impugned Notification dated 25/8/2015 of the Respondent No: 2 is in accordance to the Notification dated 30/4/2014 . (Hence the plea of the appellant is without any legal force & is liable to be dismissed.
- B Incorrect & not admitted. The statement f the appellant is against the law, rules & circumstance of the case. Hence deserves to be rejected.
- C Incorrect & not admitted. The condition of Para-6 of the terms & conditions of the impugned Notification dated 25/8/2015 is in accordance with law, rules & policy.
- D Incorrect & not admitted. The Respondents have acted as per law, rules & policy in the instant case in terms of Notification dated 30/4/2014, wherein, vide Para-6 the conditions of school based recruitment / adjustment has been made applicable upon the appellant in the interest of students community .
- E Incorrect & not admitted. No such appointment vide Notification 'dated 03/2/2007, wherein the condition of school based has been ignored. However the Respondents are bound to follow the instructions & policy of the Govt: in recruitment & adjustment process of a Civil Servants as adopted in the present case of the appellant.
- F The Respondents also seek leave of this Honorable Tribunal to raise additional grounds at the time of arguments.

In view of the above made submissions, it is requested that this Honorable Tribunal may very graciously be pleased to dismiss the instant service appeal with cost in favour of the Respondent Department.

  
Secretary

E&SE. Department Khyber  
Pakhtunkhwa, Peshawar  
(Respondents No:1&2)

  
Director

E&SE Department Khyber  
Pakhtunkhwa, Peshawar.  
(Respondents No: 3,4,6&7)

**AFFIDAVIT**

I Khaista Rehman Asstt: Director (Litigation-II) E&SE Department do hereby solemnly affirm and declare that the contents of the instant Parawise Comments are true & correct to the best of my knowledge & belief.

  
Deponent

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

Service Appeal No: 181/2016

**Sher Muhammad Principal BPS-18 GHS Kamar, Swat.** .... Appellant.

**VERSUS**

Secretary E&SE Department, Khyber Pakhtunkhwa & others. .... Respondents

**JOINT PARAWISE COMMENTS FOR & ON BEHALF OF RESPONDENTS No: 1-4&6.**

Respectfully Sheweth :-

The Respondents submit as under:-

**PRELIMINARY OBJECTIONS.**

- 1 That the Appellant has got no cause of action locus / standi .
- 2 That the instant Service Appeal is badly time barred.
- 3 That the Appellant has concealed material facts from this Honorable Tribunal.
- 4 That the instant service appeal is based on mala fide intentions.
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- 10 That the instant Service Appeal is barred by law.
- 11 That the Appellant is not competent to file the instant appeal against the respondents.
- 12 That the Notification dated 25/8/2015, is legally competent & is liable to be maintained.
- 13 That the school based adjustment of the appellant is in accordance with the Notification dated 30/4/2014 of the Respondent No: 2.

**FACTS**

- 1 That Para-1, needs no comments, being pertain to the service record of the appellant.
- 2 That Para-2 is correct to the extent that the Public Service commission Govt: of KPK has announced /advertised 67 posts of Principal BPS-18 in E&SE Department vide advertisement No: 02/2011 on its Web site (copy of the same is annexure -A).
- 3 That Para-3 is correct. Hence needs no comments .
- 4 That Para-4 is correct to the extent that the appellant has been recommended by the KPK Public Service Commission against the Principal BPS-18 posts & on the basis of the said recommendations, he has been adjusted against the said post vide the impugned Notification dated 25/8/2015 on regular basis & with immediate effect with the following terms & conditions vide Para-6 which says that their recruitment shall be school based & shall not be transferable to any other school. (Copy of the Notification No: SO(PE) 4-5/Meeting/2014/Teaching Cadre/ date 30/4/2014 is Annexure-B).

- 5 That Para-5 is incorrect & denied . The condition of school based recruitment vide Para-6 of the impugned Notification dated 25/8/2015 is in accordance with the Notification dated 30/4/2014, wherein vide selection criteria of S/No: 1 it has clearly being mentioned that appointments through initial recruitment on adhoc shall be made through merit on school base. Hence, the plea of the appellants is illegal & without any justification as the Respondents have acted as per law, rules & policy in the instant case. (Copy of the same is already annexed as Annexure-B).
- 6 That Para-6 is correct that the appellant has filed a Departmental; Appeal before the competent authority which has been rejected vide order dated 29/01/2016, by the Respondent No:2 of being without any force & merit by the Respondent No: 2(Copy of the said are annexures-C&D).
- 7 That Para-7 is correct to the extent that the Respondent Department has rejected the Departmental Appeal of the appellant of being merit less & without any legal force . Hence the Respondents further submit on the following grounds inter alia :-

**GROUNDS**

- A Incorrect & not admitted. The condition of Para-6 in the impugned Notification dated 25/8/2015 of the Respondent No: 2 is in accordance to the Notification dated 30/4/2014 . (Hence the plea of the appellant is without any legal force & is liable to be dismissed.
- B Incorrect & not admitted. The statement of the appellant is against the law, rules & circumstance of the case. Hence deserves to be rejected.
- C Incorrect & not admitted. The condition of Para-6 of the terms & conditions of the impugned Notification dated 25/8/2015 is in accordance with law, rules & policy.
- D Incorrect & not admitted. The Respondents have acted as per law, rules & policy in the instant case in terms of Notification dated 30/4/2014, wherein, vide Para-6 the conditions of school based recruitment / adjustment has been made applicable upon the appellant in the interest of students community .
- E Incorrect & not admitted. No such appointment vide Notification dated 03/2/2007, wherein the condition of school based has been ignored. However the Respondents are bound to follow the instructions & policy of the Govt: in recruitment & adjustment process of a Civil Servants as adopted in the present case of the appellant.
- F The Respondents also seek leave of this Honorable Tribunal to raise additional grounds at the time of arguments.

In view of the above made submissions, it is requested that this Honorable Tribunal may very graciously be pleased to dismiss the instant service appeal with cost in favour of the Respondent Department.

  
Secretary


E&SE Department Khyber  
Pakhtunkhwa, Peshawar  
(Respondents No:1&2)

  
Director

E&SE Department Khyber  
Pakhtunkhwa, Peshawar.  
(Respondents No: 3,4,6&7)

**AFFIDAVIT**

I Khaista Rehman Asstt: Director (Litigation-II) E&SE Department do hereby solemnly affirm and declare that the contents of the instant Parawise Comments are true & correct to the best of my knowledge & belief.

  
Deponent

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

Service Appeal No: 182/2016

**Ishaq Ali shah Principal BPS-18 GHS Bagatto District Hangu .... Appellant.**

**VERSUS**

Secretary E&SE Department, Khyber Pakhtunkhwa & others. .... Respondents

**JOINT PARAWISE COMMENTS FOR & ON BEHALF OF RESPONDENTS No: 1-4&6.**

Respectfully Sheweth :-

The Respondents submit as under:-

**PRELIMINARY OBJECTIONS.**

- 1 That the Appellant has got no-cause of action locus / standi .
- 2 That the instant Service Appeal is badly time barred.
- 3 That the Appellant has concealed material facts from this Honorable Tribunal.
- 4 That the instant service appeal is based on mala fide intentions.
- 5 That the Appellant has not come to this Honorable Tribunal with clean hands.
- 6 That the instant Service Appeal is against the prevailing law & rules.
- 7 That the Appellant has been treated as per law, rules & policy.
- 8 That the appeal is not maintainable in its present form.
- 9 That the appeal is bad for mis-joinder & non-joinder of the necessary parties.
- 10 That the instant Service Appeal is barred by law.
- 11 That the Appellant is not competent to file the instant appeal against the respondents.
- 12 That the Notification dated 25/8/2015, is legally competent & is liable to be maintained.
- 13 That the school based adjustment of the appellant is in accordance with the Notification dated 30/4/2014 of the Respondent No: 2.

**FACTS**

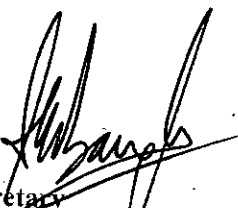
- 1 That Para-1, needs no comments, being pertain to the service record of the appellant.
- 2 That Para-2 is correct to the extent that the Public Service commission Govt: of KPK has announced /advertised 67 posts of Principal BPS-18 in E&SE Department vide advertisement No: 02/2011 on its Web site (copy of the same is annexure -A).
- 3 That Para-3 is correct. Hence needs no comments .
- 4 That Para-4 is correct to the extent that the appellant has been recommended by the KPK Public Service Commission against the Principal BPS-18 posts & on the basis of the said recommendations, he has been adjusted against the said post vide the impugned Notification dated 25/8/2015 on regular basis & with immediate effect with the following terms & conditions vide Para-6 which says that their recruitment shall be school based & shall not be transferable to any other school. (Copy of the Notification No: SO(PE) 4-5/Meeting/2014/Teaching Cadre/ date 30/4/2014 is Annexure-B).

5. That Para-5 is incorrect & denied. The condition of school based recruitment vide Para-6 of the impugned Notification dated 25/8/2015 is in accordance with the Notification dated 30/4/2014, wherein vide selection criteria of S/No: 1 it has clearly being mentioned that appointments through initial recruitment on adhoc shall be made through merit on school base. Hence, the plea of the appellants is illegal & without any justification as the Respondents have acted as per law, rules & policy in the instant case. (Copy of the same is already annexed as Annexure-B).
6. That Para-6 is correct that the appellant has filed a Departmental; Appeal before the competent authority which has been rejected vide order dated 29/01/2016, by the Respondent No:2 of being without any force & merit by the Respondent No: 2(Copy of the said are annexures-C&D).
7. That Para-7 is correct to the extent that the Respondent Department has rejected the Departmental Appeal of the appellant of being merit less & without any legal force. Hence the Respondents further submit on the following grounds inter alia :-


**GROUNDS**

- A. Incorrect & not admitted. The condition of Para-6 in the impugned Notification dated 25/8/2015 of the Respondent No: 2 is in accordance to the Notification dated 30/4/2014. (Hence the plea of the appellants is without any legal force & is liable to be dismissed.
- B. Incorrect & not admitted. The statement of the appellant is against the law, rules & circumstance of the case. Hence deserves to be rejected.
- C. Incorrect & not admitted. The condition of Para-6 of the terms & conditions of the impugned Notification dated 25/8/2015 is in accordance with law, rules & policy.
- D. Incorrect & not admitted. The Respondents have acted as per law, rules & policy in the instant case in terms of Notification dated 30/4/2014, wherein, vide Para-6 the conditions of school based recruitment / adjustment has been made applicable upon the appellants in the interest of students community.
- E. Incorrect & not admitted. No such appointment vide Notification dated 03/2/2007, wherein the condition of school based has been ignored. However the Respondents are bound to follow the instructions & policy of the Govt: in recruitment & adjustment process of a Civil Servants as adopted in the present case of the appellants.
- F. The Respondents also seek leave of this Honorable Tribunal to raise additional grounds at the time of arguments.

**In view of the above made submissions, it is requested that this Honorable Tribunal may very graciously be pleased to dismiss the instant service appeal with cost in favour of the Respondent Department.**

  
Secretary

E&SE Department Khyber  
Pakhtunkhwa, Peshawar  
(Respondents No:1&2)

  
Director  
E&SE Department Khyber  
Pakhtunkhwa, Peshawar.  
(Respondents No: 3,4,6&7)

28/7/2016

**AFFIDAVIT**

I Khaista Rehman Asstt: Director (Litigation-II) E&SE Department do hereby solemnly affirm and declare that the contents of the instant Parawise Comments are true & correct to the best of my knowledge & belief.

  
Deponent

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

Service Appeal No: 183/2016

**Jamilur Rehman Principal BPS-18 GHS Gabasni, Swabi** .... Appellant.

**VERSUS**

Secretary E&SE Department, Khyber Pakhtunkhwa & others. .... Respondents

**JOINT PARAWISE COMMENTS FOR & ON BEHALF OF RESPONDENTS No: 1-4&6.**

Respectfully Sheweth :-

The Respondents submit as under:-

**PRELIMINARY OBJECTIONS.**

- 1 That the Appellant has got no cause of action locus / standi .
- 2 That the instant Service Appeal is badly time barred.
- 3 That the Appellant has concealed material facts from this Honorable Tribunal.
- 4 That the instant service appeal is based on mala fide intentions.
- 5 That the Appellant has not come to this Honorable Tribunal with clean hands.
- 6 That the instant Service Appeal is against the prevailing law & rules.
- 7 That the Appellant has been treated as per law, rules & policy.
- 8 That the appeal is not maintainable in its present form.
- 9 That the appeal is bad for mis-joinder & non-joinder of the necessary parties.
- 10 That the instant Service Appeal is barred by law.
- 11 That the Appellant is not competent to file the instant appeal against the respondents.
- 12 That the Notification dated 25/8/2015, is legally competent & is liable to be maintained.
- 13 That the school based adjustment of the appellant is in accordance with the Notification dated 30/4/2014 of the Respondent No: 2.

**FACTS**

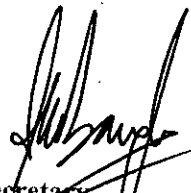
- 1 That Para-1, needs no comments, being pertain to the service record of the appellant.
- 2 That Para-2 is correct to the extent that the Public Service Commission Govt: of KPK has announced /advertised 67 posts of Principal BPS-18 in E&SE Department vide advertisement No: 02/2011 on its Web site (copy of the same is annexure -A).
- 3 That Para-3 is correct. Hence needs no comments .
- 4 That Para-4 is correct to the extent that the appellant has been recommended by the KPK Public Service Commission against the Principal BPS-18 posts & on the basis of the said recommendations, he has been adjusted against the said post vide the impugned Notification dated 25/8/2015 on regular basis & with immediate effect with the following terms & conditions vide Para-6 which says that their recruitment shall be school based & shall not be transferable to any other school. (Copy of the Notification No: SO(PE) 4-5/Meeting/2014/Teaching Cadre/ date 30/4/2014 is Annexure-B).

- 5 That Para-5 is incorrect & denied . The condition of school based recruitment vide Para-6 of the impugned Notification dated 25/8/2015 is, in accordance with the Notification dated 30/4/2014, wherein vide selection criteria of S/No: 1 it has clearly being mentioned that appointments through initial recruitment on adhoc shall be made through merit on school base. Hence, the plea of the appellants is illegal & without any justification as the Respondents have acted as per law, rules & policy in the instant case. (Copy of the same is already annexed as Annexure-B).
- 6 That Para-6 is correct that the appellant has filed a Departmental; Appeal before the competent authority which has been rejected vide order dated 29/01/2016, by the Respondent No:2 of being without any force & merit by the Respondent No: 2(Copy of the said are annexures-C&D).
- 7 That Para-7 is correct to the extent that the Respondent Department has rejected the Departmental Appeal of the appellant of being merit less & without any legal force . Hence the Respondents further submit on the following grounds inter alia :-


**GROUND**

- A Incorrect & not admitted. The condition of Para-6 in the impugned Notification dated 25/8/2015 of the Respondent No: 2 is in accordance to the Notification dated 30/4/2014 . (Hence the plea of the appellant is without any legal force & is liable to be dismissed.
- B Incorrect & not admitted. The statement of the appellant is against the law, rules & circumstance of the case. Hence deserves to be rejected.
- C Incorrect & not admitted. The condition of Para-6 of the terms & conditions of the impugned Notification dated 25/8/2015 is in accordance with law, rules & policy.
- D Incorrect & not admitted. The Respondents have acted as per law, rules & policy in the instant case in terms of Notification dated 30/4/2014, wherein, vide Para-6 the conditions of school based recruitment / adjustment has been made applicable upon the appellant in the interest of students community .
- E Incorrect & not admitted. No such appointment vide Notification dated 03/2/2007, wherein the condition of school based has been ignored. However the Respondents are bound to follow the instructions & policy of the Govt: in recruitment & adjustment process of a Civil Servants as adopted in the present case of the appellant.
- F The Respondents also seek leave of this Honorable Tribunal to raise additional grounds at the time of arguments.

In view of the above made submissions, it is requested that this Honorable Tribunal may very graciously be pleased to dismiss the instant service appeal with cost in favour of the Respondent Department.

  
Secretary

E&SE Department Khyber  
Pakhtunkhwa, Peshawar  
(Respondents No:1&2)

  
Director  
E&SE Department Khyber  
Pakhtunkhwa, Peshawar.  
(Respondents No: 3,4,6&7)

18/7/2016

**AFFIDAVIT**

I Khaista Rehman Asstt: Director (Litigation-II) E&SE Department do hereby solemnly affirm and declare that the contents of the instant Parawise Comments are true & correct to the best of my knowledge & belief.

  
Deponent



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

Service Appeal No: 184/2016

**Muhammad Siraj V/P BPS-18 GHSS Urmar Payan, Peshawar .... Appellant.**

**VERSUS**

Secretary E&SE Department, Khyber Pakhtunkhwa & others. .... Respondents

**JOINT PARAWISE COMMENTS FOR & ON BEHALF OF RESPONDENTS No: 1-4&6.**

Respectfully Sheweth :-

The Respondents submit as under:-

**PRELIMINARY OBJECTIONS.**

- 1 That the Appellant has got no cause of action locus / standi .
- 2 That the instant Service Appeal is badly time barred.
- 3 That the Appellant has concealed material facts from this Honorable Tribunal.
- 4 That the instant service appeal is based on mala fide intentions.
- 5 That the Appellant has not come to this Honorable Tribunal with clean hands.
- 6 That the instant Service Appeal is against the prevailing law & rules.
- 7 That the Appellant has been treated as per law, rules & policy.
- 8 That the appeal is not maintainable in its present form.
- 9 That the appeal is bad for mis-joinder & non-joinder of the necessary parties.
- 10 That the instant Service Appeal is barred by law.
- 11 That the Appellant is not competent to file the instant appeal against the respondents.
- 12 That the Notification dated 25/8/2015, is legally competent & is liable to be maintained.
- 13 That the school based adjustment of the appellant is in accordance with the Notification dated 30/4/2014 of the Respondent No: 2.

**FACTS**

- 1 That Para-1, needs no comments, being pertain to the service record of the appellant.
- 2 That Para-2 is correct to the extent that the Public Service Commission Govt: of KPK has announced /advertised 67 posts of Principal BPS-18 in E&SE Department vide advertisement No: 02/2011 on its Web site (copy of the same is annexure -A).
- 3 That Para-3 is correct. Hence needs no comments .
- 4 That Para-4 is correct to the extent that the appellant has been recommended by the KPK Public Service Commission against the Principal BPS-18 posts & on the basis of the said recommendations, he has been adjusted against the said post vide the impugned Notification dated 25/8/2015 on regular basis & with immediate effect with the following terms & conditions vide Para-6 which says that their recruitment shall be school based & shall not be transferable to any other school. (Copy of the Notification No: SO(PE) 4-5/Meeting/2014/Teaching Cadre/ date 30/4/2014 is Annexure-B).

- 5 That Para-5 is incorrect & denied . The condition of school based recruitment vide Para-6 of the impugned Notification dated 25/8/2015 is in accordance with the Notification dated 30/4/2014, wherein vide selection criteria of S/No: 1 it has clearly being mentioned that appointments through initial recruitment on adhoc shall be made through merit on school base. Hence, the plea of the appellant is illegal & without any justification as the Respondents have acted as per law, rules & policy in the instant case. (Copy of the same is already annexed as Annexure-B).
- 6 That Para-6 is correct that the appellant has filed a Departmental; Appeal before the competent authority which has been rejected vide order dated 29/01/2016, by the Respondent No:2 of being without any force & merit by the Respondent No: 2(Copy of the said are annexures-C&D).
- 7 That Para-7 is correct to the extent that the Respondent Department has rejected the Departmental Appeal of the appellant of being merit less & without any legal force . Hence the Respondents further submit on the following grounds inter alia :-


**GROUND**

- A Incorrect & not admitted. The condition of Para-6 in the impugned Notification dated 25/8/2015 of the Respondent No: 2 is in accordance to the Notification dated 30/4/2014 . (Hence the plea of the appellant is without any legal force & is liable to be dismissed.
- B Incorrect & not admitted. The statement f the appellant is against the law, rules & circumstance of the case. Hence deserves to be rejected.
- C Incorrect & not admitted. The condition of Para-6 of the terms & conditions of the impugned Notification dated 25/8/2015 is in accordance with law, rules & policy.
- D Incorrect & not admitted. The Respondents have acted as per law, rules & policy in the instant case in terms of Notification dated 30/4/2014, wherein, vide Para-6 the conditions of school based recruitment / adjustment has been made applicable upon the appellant in the interest of students community .
- E Incorrect & not admitted. No such appointment vide Notification dated 03/2/2007, wherein the condition of school based has been ignored. However the Respondents are bound to follow the instructions & policy of the Govt. in recruitment & adjustment process of a Civil Servants as adopted in the present case of the appellant.
- F The Respondents also seek leave of this Honorable Tribunal to raise additional grounds at the time of arguments.

In view of the above made submissions, it is requested that this Honorable Tribunal may very graciously be pleased to dismiss the instant service appeal with cost in favour of the Respondent Department.

  
Secretary


E&SE Department Khyber  
Pakhtunkhwa, Peshawar  
(Respondents No:1&2)

  
Director  
E&SE Department Khyber  
Pakhtunkhwa, Peshawar.  
(Respondents No: 3,4,6&7)

18/7/2016

**AFFIDAVIT**

I Khaista Rehman Asstt: Director (Litigation-II) E&SE Department do hereby solemnly affirm and declare that the contents of the instant Parawise Comments are true & correct to the best of my knowledge & belief.

  
Deponent

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

Service Appeal No: 185/2016

**Alamzeb V/Principal B-18 GHSS Khan Pur Dir (Lower)**

.... Appellant.

**VERSUS**

Secretary E&SE Department, Khyber Pakhtunkhwa & others.

..... Respondents

**JOINT PARAWISE COMMENTS FOR & ON BEHALF OF RESPONDENTS No: 1-4&6.**

Respectfully Sheweth :-

The Respondents submit as under:-

**PRELIMINARY OBJECTIONS.**

- 1 That the Appellant has got no cause of action locus / standi .
- 2 That the instant Service Appeal is badly time barred.
- 3 That the Appellant has concealed material facts from this Honorable Tribunal.
- 4 That the instant service appeal is based on mala fide intentions.
- 5 That the Appellant has not come to this Honorable Tribunal with clean hands.
- 6 That the instant Service Appeal is against the prevailing law & rules.
- 7 That the Appellant has been treated as per law, rules & policy.
- 8 That the appeal is not maintainable in its present form.
- 9 That the appeal is bad for mis-joinder & non-joinder of the necessary parties.
- 10 That the instant Service Appeal is barred by law.
- 11 That the Appellant is not competent to file the instant appeal against the respondents.
- 12 That the Notification dated 25/8/2015, is legally competent & is liable to be maintained.
- 13 That the school based adjustment of the appellant is in accordance with the Notification dated 30/4/2014 of the Respondent No: 2.

**FACTS**

- 1 That Para-1, needs no comments, being pertain to the service record of the appellant.
- 2 That Para-2 is correct to the extent that the Public Service commission Govt: of KPK has announced /advertised 67 posts of Principal BPS-18 in E&SE Department vide advertisement No: 02/2011 on its Web site (copy of the same is annexure -A).
- 3 That Para-3 is correct. Hence needs no comments .
- 4 That Para-4 is correct to the extent that the appellant has been recommended by the KPK Public Service Commission against the Principal BPS-18 posts & on the basis of the said recommendations, he has been adjusted against the said post vide the impugned Notification dated 25/8/2015 on regular basis & with immediate effect with the following terms & conditions vide Para-6 which says that their recruitment shall be school based & shall not be transferable to any other school. (Copy of the Notification No: SO(PE) 4-5/Meeting/2014/Teaching Cadre/ date 30/4/2014 is Annexure-B).

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

Service Appeal No: 186/2016

**Shahzada Instructor B-18 RITE(M) Malakand**

.... Appellant.

**VERSUS**

Secretary E&SE Department, Khyber Pakhtunkhwa & others.

..... Respondents

**JOINT PARAWISE COMMENTS FOR & ON BEHALF OF RESPONDENTS No: 1-4&6.**

Respectfully Sheweth :-

The Respondents submit as under:-

**PRELIMINARY OBJECTIONS.**

- 1 That the Appellant has got no cause of action locus / standi .
- 2 That the instant Service Appeal is badly time barred.
- 3 That the Appellant has concealed material facts from this Honorable Tribunal.
- 4 That the instant service appeal is based on mala fide intentions.
- 5 That the Appellant has not come to this Honorable Tribunal with clean hands.
- 6 That the instant Service Appeal is against the prevailing law & rules.
- 7 That the Appellant has been treated as per law, rules & policy.
- 8 That the appeal is not maintainable in its present form.
- 9 That the appeal is bad for mis-joinder & non-joinder of the necessary parties.
- 10 That the instant Service Appeal is barred by law.
- 11 That the Appellant is not competent to file the instant appeal against the respondents.
- 12 That the Notification dated 25/8/2015, is legally competent & is liable to be maintained.
- 13 That the school based adjustment of the appellant is in accordance with the Notification dated 30/4/2014 of the Respondent No: 2.

**FACTS**


- 1 That Para-1, needs no comments, being pertain to the service record of the appellant.
- 2 That Para-2 is correct to the extent that the Public Service Commission Govt: of KPK has announced /advertised 67 posts of Principal BPS-18 in E&SE Department vide advertisement No: 02/2011 on its Web site (copy of the same is annexure -A).
- 3 That Para-3 is correct. Hence needs no comments .
- 4 That Para-4 is correct to the extent that the appellant has been recommended by the KPK Public Service Commission against the Principal BPS-18 posts & on the basis of the said recommendations, he has been adjusted against the said post vide the impugned Notification dated 25/8/2015 on regular basis & with immediate effect with the following terms & conditions vide Para-6 which says that their recruitment shall be school based & shall not be transferable to any other school. (Copy of the Notification No: SO(PE) 4-5/Meeting/2014/Teaching Cadre/ date 30/4/2014 is Annexure-B).

- 5 That Para-5 is incorrect & denied . The condition of school based recruitment vide Para-6 of the impugned Notification dated 25/8/2015 is in accordance with the Notification dated 30/4/2014, wherein vide selection criteria of S/No: 1 it has clearly being mentioned that appointments through initial recruitment on adhoc shall be made through merit on school base. Hence, the plea of the appellants is illegal & without any justification as the Respondents have acted as per law, rules & policy in the instant case. (Copy of the same is already annexed as Annexure-B).
- 6 That Para-6 is correct that the appellant has filed a Departmental; Appeal before the competent authority which has been rejected vide order dated 29/01/2016, by the Respondent No:2 of being without any force & merit by the Respondent No: 2(Copy of the said are annexures-C&D).
- 7 That Para-7 is correct to the extent that the Respondent Department has rejected the Departmental Appeal of the appellant of being merit less & without any legal force . Hence the Respondents further submit on the following grounds inter alia :-

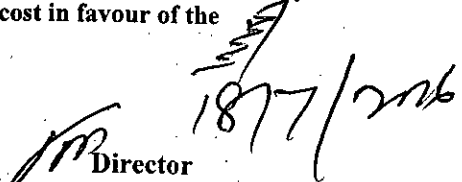
**GROUND**

- A Incorrect & not admitted. The condition of Para-6 in the impugned Notification dated 25/8/2015 of the Respondent No: 2 is in accordance to the Notification dated 30/4/2014 . (Hence the plea of the appellants is without any legal force & is liable to be dismissed.
- B Incorrect & not admitted. The statement of the appellant is against the law, rules & circumstance of the case. Hence deserves to be rejected.
- C Incorrect & not admitted. The condition of Para-6 of the terms & conditions of the impugned Notification dated 25/8/2015 is in accordance with law, rules & policy.
- D Incorrect & not admitted. The Respondents have acted as per law, rules & policy in the instant case in terms of Notification dated 30/4/2014, wherein, vide Para-6 the conditions of school based recruitment / adjustment has been made applicable upon the appellants in the interest of students community .
- E Incorrect & not admitted. No such appointment vide Notification dated 03/2/2007, wherein the condition of school based has been ignored. However the Respondents are bound to follow the instructions & policy of the Govt: in recruitment & adjustment process of a Civil Servants as adopted in the present case of the appellants.
- F The Respondents also seek leave of this Honorable Tribunal to raise additional grounds at the time of arguments.

In view of the above made submissions, it is requested that this Honorable Tribunal may very graciously be pleased to dismiss the instant service appeal with cost in favour of the Respondent Department.

  
Secretary

E&SE Department Khyber  
Pakhtunkhwa, Peshawar  
(Respondents No:1&2)

  
Director  
E&SE Department Khyber  
Pakhtunkhwa, Peshawar.  
(Respondents No: 3,4,6&7)

**AFFIDAVIT**

I Khaista Rehman Asstt: Director:(Litigation-II) E&SE Department do hereby solemnly affirm and declare that the contents of the instant Parawise Comments are true & correct to the best of my knowledge & belief.

  
Deponent

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

Service Appeal No: 187/2016

**Taj Wali Instructor B-18 RITER(M) Haripur**

.... Appellant.

**VERSUS**

Secretary E&SE Department, Khyber Pakhtunkhwa & others.

..... Respondents

**JOINT PARAWISE COMMENTS FOR & ON BEHALF OF RESPONDENTS No: 1-4&6.**

Respectfully Sheweth :-

The Respondents submit as under:-

**PRELIMINARY OBJECTIONS.**

- 1 That the Appellant has got no cause of action locus / standi .
- 2 That the instant Service Appeal is badly time barred.
- 3 That the Appellant has concealed material facts from this Honorable Tribunal.
- 4 That the instant service appeal is based on mala fide intentions.
- 5 That the Appellant has not come to this Honorable Tribunal with clean hands.
- 6 That the instant Service Appeal is against the prevailing law & rules.
- 7 That the Appellant has been treated as per law, rules & policy.
- 8 That the appeal is not maintainable in its present form.
- 9 That the appeal is bad for mis-joinder & non-joinder of the necessary parties.
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- 11 That the Appellant is not competent to file the instant appeal against the respondents.
- 12 That the Notification dated 25/8/2015, is legally competent & is liable to be maintained.
- 13 That the school based adjustment of the appellant is in accordance with the Notification dated 30/4/2014 of the Respondent No: 2.

**FACTS**

- 1 That Para-1, needs no comments, being pertain to the service record of the appellant.
- 2 That Para-2 is correct to the extent that the Public Service commission Govt: of KPK has announced /advertised 67 posts of Principal BPS-18 in E&SE Department vide advertisement No: 02/2011 on its Web site (copy of the same is annexure -A).
- 3 That Para-3 is correct. Hence needs no comments .
- 4 That Para-4 is correct to the extent that the appellant has been recommended by the KPK Public Service Commission against the Principal BPS-18 posts & on the basis of the said recommendations, he has been adjusted against the said post vide the impugned Notification dated 25/8/2015 on regular basis & with immediate effect with the following terms & conditions vide Para-6 which says that their recruitment shall be school based & shall not be transferable to any other school. (Copy of the Notification No: SO(PE) 4-5/Meeting/2014/Teaching Cadre/ date 30/4/2014 is Annexure-B).

- 5 That Para-5 is incorrect & denied . The condition of school based recruitment vide Para-6 of the impugned Notification dated 25/8/2015 is in accordance with the Notification dated 30/4/2014, wherein vide selection criteria of S/No: 1 it has clearly being mentioned that appointments through initial recruitment on adhoc shall be made through merit on school base. Hence, the plea of the appellants is illegal & without any justification as the Respondents have acted as per law, rules & policy in the instant case. (Copy of the same is already annexed as Annexure-B).
- 6 That Para-6 is correct that the appellant has filed a Departmental; Appeal before the competent authority which has been rejected vide order dated 29/01/2016, by the Respondent No:2 of being without any force & merit by the Respondent No: 2(Copy of the said are annexures-C&D).
- 7 That Para-7 is correct to the extent that the Respondent Department has rejected the Departmental Appeal of the appellant of being merit less & without any legal force . Hence the Respondents further submit on the following grounds inter alia :-

**GROUND**

- A Incorrect & not admitted. The condition of Para-6 in the impugned Notification dated 25/8/2015 of the Respondent No: 2 is in accordance to the Notification dated 30/4/2014 . (Hence the plea of the appellant is without any legal force & is liable to be dismissed.
- B Incorrect & not admitted. The statement of the appellant is against the law, rules & circumstance of the case. Hence deserves to be rejected.
- C Incorrect & not admitted. The condition of Para-6 of the terms & conditions of the impugned Notification dated 25/8/2015 is in accordance with law, rules & policy.
- D Incorrect & not admitted. The Respondents have acted as per law, rules & policy in the instant case in terms of Notification dated 30/4/2014, wherein, vide Para-6 the conditions of school based recruitment / adjustment has been made applicable upon the appellant in the interest of students community .
- E Incorrect & not admitted. No such appointment vide Notification dated 03/2/2007, wherein the condition of school based has been ignored. However the Respondents are bound to follow the instructions & policy of the Govt: in recruitment & adjustment process of a Civil Servants as adopted in the present case of the appellant.
- F The Respondents also seek leave of this Honorable Tribunal to raise additional grounds at the time of arguments.

**In view of the above made submissions, it is requested that this Honorable Tribunal may very graciously be pleased to dismiss the instant service appeal with cost in favour of the Respondent Department.**

  
Secretary

E&SE Department Khyber  
Pakhtunkhwa, Peshawar  
(Respondents No:1&2)

  
Director

E&SE Department Khyber  
Pakhtunkhwa, Peshawar.  
(Respondents No: 3,4,6&7)

**AFFIDAVIT**

I Khaista Rehman Asstt: Director (Litigation-II) E&SE Department do hereby solemnly affirm and declare that the contents of the instant Parawise Comments are true & correct to the best of my knowledge & belief.

  
Deponent

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

Service Appeal No: 188/2016

**Irfanullah V/P B-18 GHSS Pir Pai, District Nowshera**

.... Appellant.

**VERSUS**

Secretary E&SE Department, Khyber Pakhtunkhwa & others.

..... Respondents

**JOINT PARAWISE COMMENTS FOR & ON BEHALF OF RESPONDENTS No: 1-4&6.**

Respectfully Sheweth :-

The Respondents submit as under:-

**PRELIMINARY OBJECTIONS.**

- 1 That the Appellant has got no cause of action locus / standi .
- 2 That the instant Service Appeal is badly time barred.
- 3 That the Appellant has concealed material facts from this Honorable Tribunal.
- 4 That the instant service appeal is based on mala fide intentions.
- 5 That the Appellant has not come to this Honorable Tribunal with clean hands.
- 6 That the instant Service Appeal is against the prevailing law & rules.
- 7 That the Appellant has been treated as per law, rules & policy.
- 8 That the appeal is not maintainable in its present form.
- 9 That the appeal is bad for mis-joinder & non-joinder of the necessary parties.
- 10 That the instant Service Appeal is barred by law.
- 11 That the Appellant is not competent to file the instant appeal against the respondents.
- 12 That the Notification dated 25/8/2015, is legally competent & is liable to be maintained.
- 13 That the school based adjustment of the appellant is in accordance with the Notification dated 30/4/2014 of the Respondent No: 2.

**FACTS**

- 1 That Para-1, needs no comments, being pertain to the service record of the appellant.
- 2 That Para-2 is correct to the extent that the Public Service commission Govt: of KPK has announced /advertised 67 posts of Principal BPS-18 in E&SE Department vide advertisement No: 02/2011 on its Web site (copy of the same is annexure -A).
- 3 That Para-3 is correct. Hence needs no comments .
- 4 That Para-4 is correct to the extent that the appellant has been recommended by the KPK Public Service Commission against the Principal BPS-18 posts & on the basis of the said recommendations, he has been adjusted against the said post vide the impugned Notification dated 25/8/2015 on regular basis & with immediate effect with the following terms & conditions vide Para-6 which says that their recruitment shall be school based & shall not be transferable to any other school. (Copy of the Notification No: SO(PE) 4-5/Meeting/2014/Teaching Cadre/ date 30/4/2014 is Annexure-B).

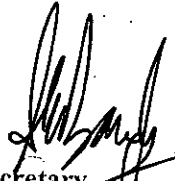


- 5 That Para-5 is incorrect & denied . The condition of school based recruitment vide Para-6 of the impugned Notification dated 25/8/2015 is in accordance with the Notification dated 30/4/2014, wherein vide selection criteria of S/No: 1 it has clearly being mentioned that appointments through initial recruitment on adhoc shall be made through merit on school base. Hence, the plea of the appellant is illegal & without any justification as the Respondents have acted as per law, rules & policy in the instant case. (Copy of the same is already annexed as Annexure-B).
- 6 That Para-6 is correct that the appellant has filed a Departmental; Appeal before the competent authority which has been rejected vide order dated 29/01/2016, by the Respondent No:2 of being without any force & merit by the Respondent No: 2(Copy of the said are annexures-C&D).
- 7 That Para-7 is correct to the extent that the Respondent Department has rejected the Departmental Appeal of the appellant of being merit less & without any legal force . Hence the Respondents further submit on the following grounds inter alia :-


**GROUNDS**

- A Incorrect & not admitted. The condition of Para-6 in the impugned Notification dated 25/8/2015 of the Respondent No: 2 is in accordance to the Notification dated 30/4/2014 . (Hence the plea of the appellant is without any legal force & is liable to be dismissed.
- B Incorrect & not admitted. The statement f the appellant is against the law, rules & circumstance of the case. Hence deserves to be rejected.
- C Incorrect & not admitted. The condition of Para-6 of the terms & conditions of the impugned Notification dated 25/8/2015 is in accordance with law, rules & policy.
- D Incorrect & not admitted. The Respondents have acted as per law, rules & policy in the instant case in terms of Notification dated 30/4/2014, wherein, vide Para-6 the conditions of school based recruitment / adjustment has been made applicable upon the appellant in the interest of students community .
- E Incorrect & not admitted. No such appointment vide Notification dated 03/2/2007, wherein the condition of school based has been ignored. However the Respondents are bound to follow the instructions & policy of the Govt: in recruitment & adjustment process of a Civil Servants as adopted in the present case of the appellant.
- F The Respondents also seek leave of this Honorable Tribunal to raise additional grounds at the time of arguments.

In view of the above made submissions, it is requested that this Honorable Tribunal may very graciously be pleased to dismiss the instant service appeal with cost in favour of the Respondent Department.

  
Secretary

E&SE Department Khyber  
Pakhtunkhwa, Peshawar  
(Respondents No:1&2)

  
Director  
E&SE Department Khyber  
Pakhtunkhwa, Peshawar.  
(Respondents No: 3,4,6&7)

**AFFIDAVIT**

I Khaista Rehman Asstt. Director (Litigation-II) E&SE Department do hereby solemnly affirm and declare that the contents of the instant Parawise Comments are true & correct to the best of my knowledge & belief.

  
Deponent

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

Service Appeal No: 189/2016

**Amir Zeb S/O Mustafa Kamal GHS Rustam District Mardan** .... Appellant.

**VERSUS**

Secretary E&SE Department, Khyber Pakhtunkhwa & others. .... Respondents

**JOINT PARAWISE COMMENTS FOR & ON BEHALF OF RESPONDENTS No: 1-4&6.**

Respectfully Sheweth :-

The Respondents submit as under:-

**PRELIMINARY OBJECTIONS.**

- 1 That the Appellant has got no cause of action locus / standi .
- 2 That the instant Service Appeal is badly time barred.
- 3 That the Appellant has concealed material facts from this Honorable Tribunal.
- 4 That the instant service appeal is based on mala fide intentions.
- 5 That the Appellant has not come to this Honorable Tribunal with clean hands.
- 6 That the instant Service Appeal is against the prevailing law & rules.
- 7 That the Appellant has been treated as per law, rules & policy.
- 8 That the appeal is not maintainable in its present form.
- 9 That the appeal is bad for mis-joinder & non-joinder of the necessary parties.
- 10 That the instant Service Appeal is barred by law.
- 11 That the Appellant is not competent to file the instant appeal against the respondents.
- 12 That the Notification dated 25/8/2015, is legally competent & is liable to be maintained.
- 13 That the school based adjustment of the appellant is in accordance with the Notification dated 30/4/2014 of the Respondent No: 2.

**FACTS**

- 1 That Para-1, needs no comments, being pertain to the service record of the appellant.
- 2 That Para-2 is correct to the extent that the Public Service Commission Govt: of KPK has announced /advertised 67 posts of Principal BPS-18 in E&SE Department vide advertisement No: 02/2011 on its Web site (copy of the same is annexure -A).
- 3 That Para-3 is correct. Hence needs no comments .
- 4 That Para-4 is correct to the extent that the appellant has been recommended by the KPK Public Service Commission against the Principal BPS-18 posts & on the basis of the said recommendations, he has been adjusted against the said post vide the impugned Notification dated 25/8/2015 on regular basis & with immediate effect with the following terms & conditions vide Para-6 which says that their recruitment shall be school based & shall not be transferable to any other school. (Copy of the Notification No: SO(PE) 4-5/Meeting/2014/Teaching Cadre/ date 30/4/2014 is Annexure-B).

- 5 That Para-5 is incorrect & denied . The condition of school based recruitment vide Para-6 of the impugned Notification dated 25/8/2015 is in accordance with the Notification dated 30/4/2014, wherein vide selection criteria of S/No: 1 it has clearly being mentioned that appointments through initial recruitment on adhoc shall be made through merit on school base. Hence, the plea of the appellants is illegal & without any justification as the Respondents have acted as per law, rules & policy in the instant case. (Copy of the same is already annexed as Annexure-B).
- 6 That Para-6 is correct that the appellant has filed a Departmental; Appeal before the competent authority which has been rejected vide order dated 29/01/2016, by the Respondent No:2 of being without any force & merit by the Respondent No: 2(Copy of the said are annexures-C&D).
- 7 That Para-7 is correct to the extent that the Respondent Department has rejected the Departmental Appeal of the appellant of being merit less & without any legal force . Hence the Respondents further submit on the following grounds inter alia :-


**GROUNDS**

- A Incorrect & not admitted. The condition of Para-6 in the impugned Notification dated 25/8/2015 of the Respondent No: 2 is in accordance to the Notification dated 30/4/2014 . (Hence the plea of the appellant is without any legal force & is liable to be dismissed.
- B Incorrect & not admitted. The statement of the appellant is against the law, rules & circumstance of the case. Hence deserves to be rejected.
- C Incorrect & not admitted. The condition of Para-6 of the terms & conditions of the impugned Notification dated 25/8/2015 is in accordance with law, rules & policy.
- D Incorrect & not admitted. The Respondents have acted as per law, rules & policy in the instant case in terms of Notification dated 30/4/2014, wherein, vide Para-6 the conditions of school based recruitment / adjustment has been made applicable upon the appellant in the interest of students community .
- E Incorrect & not admitted. No such appointment vide Notification dated 03/2/2007, wherein the condition of school based has been ignored. However the Respondents are bound to follow the instructions & policy of the Govt: in recruitment & adjustment process of a Civil Servants as adopted in the present case of the appellant.
- F The Respondents also seek leave of this Honorable Tribunal to raise additional grounds at the time of arguments.

In view of the above made submissions, it is requested that this Honorable Tribunal may very graciously be pleased to dismiss the instant service appeal with cost in favour of the Respondent Department.

  
Secretary


E&SE Department Khyber  
Pakhtunkhwa, Peshawar  
(Respondents No:1&2)

  
Director  
E&SE Department Khyber  
Pakhtunkhwa, Peshawar.  
(Respondents No: 3,4,6&7)

18/7/2016

**AFFIDAVIT**

I Khaista Rehman Asstt: Director (Litigation-II) E&SE Department do hereby solemnly affirm and declare that the contents of the instant Parawise Comments are true & correct to the best of my knowledge & belief.

  
Deponent

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

Service Appeal No: 190/2016

**Muhammad Irfan S/O Faqir Gul University Town, Peshawar. .... Appellant.**

**VERSUS**

Secretary E&SE Department, Khyber Pakhtunkhwa & others. .... Respondents

**JOINT PARAWISE COMMENTS FOR & ON BEHALF OF RESPONDENTS No: 1-4&6.**

**Respectfully Sheweth :-**

The Respondents submit as under:-

**PRELIMINARY OBJECTIONS.**

- 1 That the Appellant has got no cause of action locus / standi .
- 2 That the instant Service Appeal is badly time barred.
- 3 That the Appellant has concealed material facts from this Honorable Tribunal.
- 4 That the instant service appeal is based on mala fide intentions.
- 5 That the Appellant has not come to this Honorable Tribunal with clean hands.
- 6 That the instant Service Appeal is against the prevailing law & rules.
- 7 That the Appellant has been treated as per law, rules & policy.
- 8 That the appeal is not maintainable in its present form.
- 9 That the appeal is bad for mis-joinder & non-joinder of the necessary parties.
- 10 That the instant Service Appeal is barred by law.
- 11 That the Appellant is not competent to file the instant appeal against the respondents.
- 12 That the Notification dated 25/8/2015, is legally competent & is liable to be maintained.
- 13 That the school based adjustment of the appellant is in accordance with the Notification dated 30/4/2014 of the Respondent No: 2.

**FACTS**


- 1 That Para-1, needs no comments, being pertain to the service record of the appellant.
- 2 That Para-2 is correct to the extent that the Public Service commission Govt: of KPK has announced /advertised 67 posts of Principal BPS-18 in E&SE Department vide advertisement No: 02/2011 on its Web site (copy of the same is annexure -A).
- 3 That Para-3 is correct. Hence needs no comments .
- 4 That Para-4 is correct to the extent that the appellant has been recommended by the KPK Public Service Commission against the Principal BPS-18 posts & on the basis of the said recommendations, he has been adjusted against the said post vide the impugned Notification dated 25/8/2015 on regular basis & with immediate effect with the following terms & conditions vide Para-6 which says that their recruitment shall be school based & shall not be transferable to any other school. (Copy of the Notification No: SO(PE) 4-5/Meeting/2014/Teaching Cadre/ date 30/4/2014 is Annexure-B).


- 5 That Para-5 is incorrect & denied. The condition of school based recruitment vide Para-6 of the impugned Notification dated 25/8/2015 is in accordance with the Notification dated 30/4/2014, wherein vide selection criteria of S/No: 1 it has clearly being mentioned that appointments through initial recruitment on adhoc shall be made through merit on school base. Hence, the plea of the appellant is illegal & without any justification as the Respondents have acted as per law, rules & policy in the instant case. (Copy of the same is already annexed as Annexure-B).
- 6 That Para-6 is correct that the appellant has filed a Departmental; Appeal before the competent authority which has been rejected vide order dated 29/01/2016, by the Respondent No:2 of being without any force & merit by the Respondent No: 2(Copy of the said are annexures-C&D).
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**GROUND**

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- E Incorrect & not admitted. No such appointment vide Notification dated 03/2/2007, wherein the condition of school based has been ignored. However the Respondents are bound to follow the instructions & policy of the Govt: in recruitment & adjustment process of a Civil Servants as adopted in the present case of the appellant.
- F The Respondents also seek leave of this Honorable Tribunal to raise additional grounds at the time of arguments.

In view of the above made submissions, it is requested that this Honorable Tribunal may very graciously be pleased to dismiss the instant service appeal with cost in favour of the Respondent Department.

  
Secretary  
E&SE Department Khyber  
Pakhtunkhwa, Peshawar  
(Respondents No:1&2)

7877/2016  
  
Director  
E&SE Department Khyber  
Pakhtunkhwa, Peshawar.  
(Respondents No: 3,4,6&7)

**AFFIDAVIT**

I Khaista Rehman Asstt: Director (Litigation-II) E&SE Department do hereby solemnly affirm and declare that the contents of the instant Parawise Comments are true & correct to the best of my knowledge & belief.

  
Deponent


... recommended by the KPK Public Service Commission against the Principal BPS-18 posts & on the basis of the said recommendations, he has been adjusted against the said post vide the impugned Notification dated 25/8/2015 on regular basis & with immediate effect with the following terms & conditions vide Para-6 which says that their recruitment shall be school based & shall not be transferable to any other school. (Copy of the Notification No: SO(PE) 4-5/Meeting/2014/Teaching Cadre/ date 30/4/2014 is Annexure-B).


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**GROUND**

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In view of the above made submissions, it is requested that this Honorable Tribunal may very graciously be pleased to dismiss the instant service appeal with cost in favour of the Respondent Department.

  
 Secretary  
 E&SE Department Khyber  
 Pakhtunkhwa, Peshawar  
 (Respondents No:1&2)

  
 Director  
 E&SE Department Khyber  
 Pakhtunkhwa, Peshawar.  
 (Respondents No: 3,4,6&7)  
 18/7/2016

**AFFIDAVIT**

I Khaista Rehman Asstt: Director. (Litigation-II) E&SE Department do hereby solemnly affirm and declare that the contents of the instant Parawise Comments are true & correct to the best of my knowledge & belief.

  
 Deponent

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

Service Appeal No: 192/2016

**Sanaul Haq S/O Shamsul Haq, Shabqadar District Charsadda .... Appellant.**

**VERSUS**

Secretary E&SE Department, Khyber Pakhtunkhwa & others. .... Respondents

**JOINT PARAWISE COMMENTS FOR & ON BEHALF OF RESPONDENTS No: 1-4&6.**

Respectfully Sheweth :-

The Respondents submit as under:-

**PRELIMINARY OBJECTIONS.**

- 1 That the Appellant has got no cause of action locus / standi .
- 2 That the instant Service Appeal is badly time barred.
- 3 That the Appellant has concealed material facts from this Honorable Tribunal.
- 4 That the instant service appeal is based on mala fide intentions.
- 5 That the Appellant has not come to this Honorable Tribunal with clean hands.
- 6 That the instant Service Appeal is against the prevailing law & rules.
- 7 That the Appellant has been treated as per law, rules & policy.
- 8 That the appeal is not maintainable in its present form.
- 9 That the appeal is bad for mis-joinder & non-joinder of the necessary parties.
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- 11 That the Appellant is not competent to file the instant appeal against the respondents.
- 12 That the Notification dated 25/8/2015, is legally competent & is liable to be maintained.
- 13 That the school based adjustment of the appellant is in accordance with the Notification dated 30/4/2014 of the Respondent No: 2.

**FACTS**

- 1 That Para-1, needs no comments, being pertain to the service record of the appellant.
- 2 That Para-2 is correct to the extent that the Public Service Commission Govt: of KPK has announced /advertised 67 posts of Principal BPS-18 in E&SE Department vide advertisement No: 02/2011 on its Web site (copy of the same is annexure -A).
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