

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,

Appeal No. 1076/2019

Date of institution ... 21.08.2019
Date of decision 20.11.2019

Mr. Ajmal Khan son of Zarif Khan, presently residing at Duran Pur, Street No. 05, Khan Bahadar Colony, Peshawar. ... (Appellant)

Versus

Government of Khyber Pakhtunkhwa through Secretary (E&SE) Department, Peshawar and two others. ... (Respondents)

Present

Mr. Mir Zaman Safi,
Advocate ... For appellant.

MR. HAMID FAROOQ DURRANI, ... CHAIRMAN

JUDGMENTHAMID FAROOQ DURRANI, CHAIRMAN:-

1. The case of appellant, as laid in the memorandum of appeal, is that, he was appointed as Primary School Teacher (BPS-7) vide order dated 31.07.2006. Consequently, he assumed the charge at Government Primary School, Khan Gharai District Malakand and started performing his duty. In the course of his service, the appellant applied for extraordinary leave without pay which was allowed by the competent authority. That, after expiry of the initial leave another application was submitted by him in the year 2010 for extension of leave, however, the same was not responded to by the respondents. That, the appellant submitted his arrival report to the District Education Officer Malakand/respondent No. 3, however, the same was not entertained.

Thereafter, the appellant had approached the competent authority for his adjustment as PST but to no avail. The service Appeal (No. 856/2018) was preferred before the Tribunal and during its pendency it came to the knowledge of the appellant that his service was terminated through impugned order dated 30.01.2019 w.e.f 01.09.2007. A departmental appeal was preferred which remained un-responded, hence the appeal in hand.

2. Arguments of learned counsel heard and available record gone through.

3. The record relied upon by the appellant in support of his claim does not at all lend any support to him. In that context it is conspicuously noted that the purported leave granting order pertaining to the period 01.09.2007 to 31.08.2008 (1218 days), does not contain any date, signature of the issuing officer or the number. Hence, approval of leave as claimed by the appellant is nonexistent. Similarly, there is no order of further leave in pursuance to application dated 03.09.2010. On record, there is an application for acceptance of arrival by the appellant which bears the date as 04.09.2013. It is noted therein that the leave of appellant was completed on the said date, therefore, he wished to join his duty. The application seems to be totally in the air as no such leave was ever granted in favour of the appellant.

Learned counsel for the appellant also could not explain the absence of appellant from 04.09.2013 till the date of submission of departmental representation. It was the stance of appellant that ever-

since he was attempting to have his posting restored but the respondents were reluctant to allow the same. On the contrary, the appellant has appended with the appeal a copy of his CNIC which shows its date of issue as 05.03.2015 and country of stay at the relevant time as United Arab Emirates. The appellant, present in court was required to explain his stay abroad, replied that it was for two years.

4. In the circumstances, where the record belies the claim of appellant including sanctioning of extraordinary leave in his favour and his stay in the country after submission of application dated 04.09.2013, the appeal in hand does not merit admission for regular hearing. The same is, therefore, dismissed in limine.

File be consigned to record.



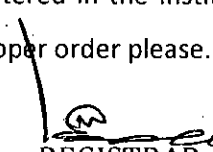


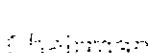
(HAMID FAROOQ DURRANI)
Chairman

ANNOUNCED
20.11.2019

Form- A
FORM OF ORDER SHEET

Court of _____

Case No.- 1076/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	21/08/2019	<p>The appeal of Mr. Ajmal Khan presented today by Mr. Noor Muhammad Khattak 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 21/8/19</p>
2-	02.10.2019	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>02/10/19</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> <p>Counsel for the appellant present.</p> <p>Learned counsel for the appellant requests for adjournment. In order to further prepare the brief.</p> <p>Adjourned to 20.11.2019 before S.B.</p> <p style="text-align: right;"> Chairman</p> <p style="text-align: right;"> Chairman</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL No. 1076 /2019

AJMAL KHAN

VS

EDUCATION DEPTT:

INDEX

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APPELLANT

THROUGH:

NOOR MOHAMMAD KHATTAK
ADVOCATE

Flat No. 3, Upper Floor,
Islamia Club Building,
Khyber Bazar, Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

APPEAL NO. 1076 /2019

Diary No. 1182

Dated 21-8-2019

Mr. Ajmal Khan S/O Zarif Khan,
Presently residing at Duran Pur, Street No. 05, Khan Bahadar Colony,
Peshawar..... **Appellant**

VERSUS

- 1- The Government of Khyber Pakhtunkhwa through Secretary (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The District Education Officer (M), District Malakand.

..... **Respondents**

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED ORDER DATED 31.01.2019 COMMUNICATED TO THE APPELLANT ON 26.04.2019 WHEREBY THE APPELLANT HAS BEEN TERMINATED FROM SERVICE AND AGAINST NO ACTION TAKEN ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITH IN THE STATUTORY PERIOD OF NINETY DAYS

PRAYER:

That on acceptance of this appeal the impugned order dated 31.01.2019 communicated to the appellant on 26.04.2019 may very kindly be set aside and the appellant may be re-instated into service with all back benefits. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

Filed to-day

Registrar

21/8/19

R/SHEWETH:

ON FACTS:

1. That appellant is the bonafide resident of PaloTal, P/O Sakhakot, Tehsil Dargai, District Malakand (presently residing at Duran Pur, Street No. 05, Khan Bahadar Colony, Peshawar) and belongs to respectable family. Copy of NIC is attached as annexure **A.**
2. That the appellant was appointed as primary school Teacher (BPS-07) now BPS-12 on the recommendation of proper Departmental selection committee in the respondent Department vide order dated 31.07.2006. That in response the

appellant submitted his charge report at GPS Khan Gharai ,District Malakand on the very next day and started performing his duty quite efficiently and to the entire satisfaction of his superiors. Copies of the appointment order, service book & attendance register are attached as annexure **B, C & D.**

3. That during service the appellant submitted an application for extra ordinary leave with out pay which was accepted by the concerned authority and as such the appellant was awarded/granted leave without pay. Copy of the leave order is attached as annexure **E.**

4. That after expiry of the said leave the appellant submitted another application for extension of his leave in the year 2010 but no response was received from the concerned quarter. Copies of the extension of leave application and other connected document are attached as annexure **F.**

5. That on expiry of the said leave the appellant submitted his arrival report to the District Education Officer District Malakand but in response the concerned authority refused the same on the reason best known to the said authority. That then after the appellant time and again requested the concerned authority for his adjustment as primary school teacher but no heed was paid to the request of appellant. Copy of the arrival report is attached as annexure **G.**

6. That appellant feeling aggrieved filed Departmental appeal followed by service appeal No. 856 /2019 before this august Tribunal. That during pendency of the above mentioned service appeal it came into the knowledge of appellant that the respondent Department has been terminated the appellant from his service vide impugned order dated 31.01.2019 which was communicated to the appellant on 26.04.2019. Copies of the departmental appeal, memo of appeal, application and impugned are attached as annexure.....**H, I, J & K.**

7. That feeling aggrieved from the impugned order dated 31.01.2019 the appellant preferred Departmental appeal but no reply has been received so far. Hence the present appeal on the following grounds amongst the others. Copy of the Departmental appeal is attached as annexure **L.**

GROUND:

A- That the impugned order dated 31.01.2019 is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.

- A- That appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the concerned authorities violated article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- B- That the respondent Department acted in arbitrary and malafide manner by issuing the impugned order dated 31.01.2019.
- C- That no charge sheet and statement of allegation has been issued to the appellant before issuing the impugned order dated 31.01.2019.
- D- That no show cause notice has been served on the appellant before the impugned order dated 31.01.2019.
- E- That no chance of personal hearing/defence has been provided to the appellant.
- F- That no publication whatsoever has been made by the respondents before issuing the impugned order dated 31.01.2019 which is mandatory as per Rule-9 of the Khyber Pakhtunkhwa Civil Servant Efficiency & Disciplinary Rules-2011.
- G- That the appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

Dated: 07.08.2019.

APPELLANT -



AJMAL KHAN

THROUGH:



NOOR MOHAMMAD KHATTAK

KAMRAN KHAN

&



**MIR ZAMAN SAFI
ADVOCATES**

Better copy

B-5

OFFICE OF THE EXECUTIVE DISTRICT EDUCATION (MALE)
MALAKAND AT BATKHELA

APPOINTMENT ORDER:

In pursuance of the instruction of the Government of NWFP Establishment Department vide letter No. SOG(Reg: VI) (E&AD) 3-1/2003 dated 22-10-2006, rules-10(4) of the N.W.F.P Civil Servants (appointment promotion and transfer) rules 1989 and recommendation of departmental Selection Committee in its meeting held on 31.07.2006, the undersigned is pleased to approve & appoint the following candidates (deceased employees children) as PST (M&I) in BPS-07 (Rs. 2555-140-6755) plus usual allowances as admissible to them under the rules against the vacant PST posts at the Schools noted against each w.e.f. the date of their taking over charge in the interest of public service with the following terms & conditions.

S. No.	Name of Candidate/ Father's Name	Address	Place of posting
1.	Ajmal Khan, S/O Zarif Khan (Late)	Village & P.O Postal Dawa Khan Kili, Sakhakot Bandajat, Malakand.	GPS Khan Garhi Sakhakot, Mkd, Agency.
2.	Jameela Begum D/O Abdul Jabbar (Late)	Vill & P.O Agra Malakand Agency.	GGPS Mishta Banda Malakand Agency

TERMS & CONDITIONS.

1. Charge report should be submitted to all concerned.
2. The appointments are temporary and liable to termination at any time without giving any reason.
3. The candidates are required to produce health and age certificate from the Medical Superintendent Malakand.
4. They should not hand over charge if their age exceeds 35 years or less than 18 years.
5. Their original testimonials should be checked & verify from the concerned Board/University/Institution after the taking over charge & before payment of salary.
6. In case they failed to resume charge within 15 days of issue of this order the order shall stand automatically cancelled.
7. Their service will be considered as regular, but in lieu of pension & gratuity they will be entitled to receive such amount contributed by them towards the C.P Fund alongwith the contribution made by the Govt: to their account in the said fund in terms of section 19 of the N.W.F.P Civil Servants Act, 1973 as amended by N.W.F.P Civil Servants amended Act, 2005.

ATTESTED

ATTESTED

(GUL ZAMAN KHAN)
EXECUTIVE DISTRICT OFFICER
(S&I) MALAKAND AT BATKHELA

OFFICE OF THE EXECUTIVE DISTRICT OFFICER
BATKHELA

MALAKAND AGENCY

APPOINTMENT

In pursuance of the instruction of the Government of N.W.F.P. Department vide letter No:SO-1(Reg: MI (E&AD) 3-1/2003 dated 22-10-2005, rules-10(4) of the N.W.F.P Civil Servants (appointment promotion and transfer) rules 1989 and recommendation of departmental Selection Committee in its meeting held on 31-07-2006, the undersigned is pleased to approve & appoint the following candidates (deceased employees children) as PST (M&F) in BPS 07(Rs.2555-140-6755) plus usual allowances as admissible thereon under the rules against the vacant PST posts at the Schools noted against each w.e.f the date of their taking-over charge in the interest of public service with the following terms & conditions.

<u>S.No</u>	<u>Name of Candidate / Father's Name.</u>	<u>Address</u>	<u>Place of posting.</u>
1.	Ajmal Khan, S/O Zarif Khan (Late)	Village & P.O Palofal Dawa Khan Kili, Sakhakot Bandajat Malakand.	GPS Khan Garhi Sakhakot Mkd: Agency.
2.	Janicela Begum D/O Abdul Jabbar (Late)	Vill: & P.O Agra Malakand Agency	GGPS Mishta Banda Malakand Agency.

TERMS & CONDITIONS.

1. Charge report should be submitted to all concerned.
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ATTESTED

(GUL ZAMAN KHAN)
EXECUTIVE DISTRICT OFFICER
(S&L) MALAKAND AT BATKHELA.

Endst. No. 13144-53 / F.No./Recd:/PST/M/2006/EDO(S&L)Mkd:DE: 31/7/2006

Copy of the above is forwarded to:

1. The District Nazim Malakand.
2. The District Coordination Officer Malakand.
- 3-4. The D.D.O (Female) Batkhela and D.D.O (M) Dargai.
5. The Agency Accounts Officer Malakand.
- 6-7. The Head Mistress/Head Teacher GGPS /GPS Concerned.
8. The B&AO, Local Office.
- 9-10. The Candidates concerned.

ATTESTED

Passed S.S.C. Examination from B.I.S.E. Faisalabad in session 1982
 S.S.C.A. under R/No 31740 & obtained 439 marks out of 550.
 (For use in Police Department only)

C- (4) (6)

Note—
 Passed F.A. Examination in session 1983 from B.I.S.E.
 Faisalabad under R/No 32864 & obtained
 244 marks out of 300.

3. Passed P.S.T. Examination from A.I.C.U. Islamabad
 in session 1988 under R/No 655312 &
 Verification Roll No. dated received back.
 obtained B Grade.

U. H. Khan
 (Some Remarks on file)

Left Thumb Impression

Qualifications	Des	Qualifications	Date
English		First Arts	
Punjabi		B.L. or B.A.	
Urdu		Pleadershp Examination	
Plan-Drawing		Training School Final Examination	
Finger Print		Other Qualifications—	
Drill Instructing			
Court Duties			
Reserve Duties			

AFFECTED

4

AFFECTED

4

Note.— Line to be drawn under the qualification possessed.

Note:— The entries in this page should be renewed or re-attested at least every five years and the Signatures to lines 9 and 10 should be dated.

1. Name: Mr. Afzal Khan

2. Race: Afghan

3. Residence: Vill & P.O. Palatal Teh. Dargai
District P. W. & P. Agency

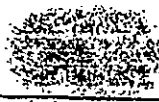
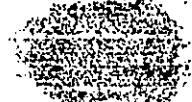



4. Father's name and residence: Mr. Larif Khan (late)

5. Date of birth by Christian era as nearly as can be ascertained: Tenth October 1914 Seventy Three
10-10-1914

6. Exact height by measurement: 5-8

7. Personal marks for identification: A small black mole on front of left shoulder

8. Left hand thumb and Finger Impression of (Non-Gazetted) Officer.

Little Finger		Ring Finger	
Middle Finger		Fore Finger	
Thumb			

9. Signature of Government Servant: [Signature]

10. Signature and Designation of the Head of the Office, or other Attesting Officer: [Signature]

ATTESTED

[Signature]

RECEIVED

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government Servant
P.T.C		B.P.S. No 7 RS 2555-140-6755					
DS/Kham Baskh	Per/...		RS 2555			1/8/06	[Signature]

ATTESTED

[Signature]

ATTESTED

[Signature]

8 - 9	10	11	12	13		14	15	
Name of Government Servant	Designation of the office attesting officer (Items 1 to 8)	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer.	Leave		Signature of the head of the office or other attesting officer	Reference to an recorded punishment or censure, or reward or praise of the Government Servant
					Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
					Period	Government to which debitable		
U. H.				APPOINTED against P.S.T. Post in B.P.S No 7 BS 2555-140-6755/V. E.D. (Sal) Madakand at Bstlkh			
idm Dargal					Office order endst No 13/44-530 31/7/2006 at S.No. (deceased Em children).	U. H. ...		
					Absent from duty on 1/9/2007.			

ATTESTED

[Signature]

ATTESTED

[Signature]

نام ز سر شاہ			PST			سید فضل خان			PST			نام ز سر شاہ		
ہد شی / PST			نام مدرسہ			نام مدرسہ			نام مدرسہ			ہد شی / PST		
تاریخ	آمد	دستخط	روائی	دستخط	آمد	دستخط	روائی	دستخط	آمد	دستخط	روائی	دستخط	آمد	دستخط
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رجسٹر حاضر فی اندرین

گورنمنٹ ہسپتال ماڈل پراویڈنٹ سوسائٹی فاٹری

بابت ماہ اپریل ۱۹۵۷ء

نام و صوبہ محل												
عہدہ												
تاریخ	آمد	دستخط	روائی	دستخط	آمد	دستخط	روائی	دستخط	آمد	دستخط	روائی	دستخط
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checked A.D.O circle Dargai

12/4/57

checked A.D.O circle Dargai

28/4/57

میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال

Handwritten signatures and stamps at the bottom left.

حسبہ حاضر فی مدرسین (12) گورنمنٹ ماڈل پیرامیڈیٹری سکول خانہ لکھی

بابت ماہ ابریل 2007

نام و پتہ مدرسین			سید فضل شاہ			سلیم خان شاہ			اعجاز خان شاہ			
نام مدرس			نام مدرس			نام مدرس			نام مدرس			
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قیمت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
اتفاقہ	Null	2	2	Null	2	2	Null	2	2	Null	3	6
استحقاق												
بیاری												
میزان کل												

نوٹ: اس مہینے میں کوئی مدرس نہیں آیا۔

دستخط ہیڈ ماسٹر

ATTESTED

کودنٹریٹنگ پریس نمبر ۱۳۰۰ آرڈو بازار لاہور ۲۰۰۵

۱۱

حاضر حاضرین

گورنمنٹ پرائمری اسکول

بابت مارچ

Handwritten notes and signatures in the top left corner.

نام ختم کل صاحب			عقدہ چوکیدار			نام ختم کل صاحب			عقدہ چوکیدار			
تاریخ	آمد	دستخط	روائی	دستخط	آمد	دستخط	روائی	دستخط	آمد	دستخط	روائی	دستخط
1	2	Handwritten	Handwritten	Handwritten								
2	2	Handwritten	Handwritten	Handwritten								
3	2	Handwritten	Handwritten	Handwritten								
4												
5	2	Handwritten	Handwritten	Handwritten								
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7	2	Handwritten	Handwritten	Handwritten								
8	2	Handwritten	Handwritten	Handwritten								
9	2	Handwritten	Handwritten	Handwritten								
10	2	Handwritten	Handwritten	Handwritten								
11												
12	2	Handwritten	Handwritten	Handwritten								
13	2	Handwritten	Handwritten	Handwritten								
14	2	Handwritten	Handwritten	Handwritten								
15	2	Handwritten	Handwritten	Handwritten								
16	2	Handwritten	Handwritten	Handwritten								
17												
18												
19	2	Handwritten	Handwritten	Handwritten								
20	2	Handwritten	Handwritten	Handwritten								
21	2	Handwritten	Handwritten	Handwritten								
22	2	Handwritten	Handwritten	Handwritten								
23	2	Handwritten	Handwritten	Handwritten								
24	2	Handwritten	Handwritten	Handwritten								
25												
26	2	Handwritten	Handwritten	Handwritten								
27	2	Handwritten	Handwritten	Handwritten								
28	2	Handwritten	Handwritten	Handwritten								
29	2	Handwritten	Handwritten	Handwritten								
30	2	Handwritten	Handwritten	Handwritten								
31	2	Handwritten	Handwritten	Handwritten								

Vertical handwritten notes on the right margin.

میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال

Handwritten signature and stamp at the bottom left.

ریسر حاضر فی مدرسین (13)

گورنمنٹ پرائمری سکول خانہ ٹنگرہ صحتی

بابت ماہ مارچ ۲۰۰۷

تاریخ	نا محمد ایوب صاحب			سید فضل خان صاحب			مسلم خان صاحب			اجمل خان صاحب			نمبر نعت
	آمد	دستخط	روائی	آمد	دستخط	روائی	آمد	دستخط	روائی	آمد	دستخط	روائی	
1	87-	Agust	1/45	830	دیا	145	830	دیا	145	830	دیا	145	2
2	87-	Agust	1/45	830	دیا	145	830	دیا	145	830	دیا	145	2
5	87-	Agust	1/45	830	دیا	145	830	دیا	145	830	دیا	145	2
4	872	Agust	1/45	830	دیا	145	830	دیا	145	830	دیا	145	2
6	87-	Agust	1/45	830	دیا	145	830	دیا	145	830	دیا	145	2
8	872	Agust	1/45	830	دیا	145	830	دیا	145	830	دیا	145	2
9	872	Agust	1/45	830	دیا	145	830	دیا	145	830	دیا	145	2
10	872	Agust	1/45	830	دیا	145	830	دیا	145	830	دیا	145	2
12	872	Agust	1/45	830	دیا	145	830	دیا	145	830	دیا	145	2
13	872	Agust	1/45	830	دیا	145	830	دیا	145	830	دیا	145	2
14	872	Agust	1/45	830	دیا	145	830	دیا	145	830	دیا	145	2
15	872	Agust	1/45	830	دیا	145	830	دیا	145	830	دیا	145	2
16	872	Agust	1/45	830	دیا	145	830	دیا	145	830	دیا	145	2
19	87-	Agust	1/45	830	دیا	145	830	دیا	145	830	دیا	145	2
20													
21	872	Agust	1/45	830	دیا	145	830	دیا	145	830	دیا	145	2
22	872	Agust	1/45	830	دیا	145	830	دیا	145	830	دیا	145	2
23													
24	87-	Agust	1/45	830	دیا	145	830	دیا	145	830	دیا	145	2
26	872	Agust	1/45	830	دیا	145	830	دیا	145	830	دیا	145	2
28	872	Agust	1/45	830	دیا	145	830	دیا	145	830	دیا	145	2
29	87-	Agust	1/45	830	دیا	145	830	دیا	145	830	دیا	145	2
30	87-	Agust	1/45	830	دیا	145	830	دیا	145	830	دیا	145	2
31	872	Agust	1/45	830	دیا	145	830	دیا	145	830	دیا	145	2

ATTESTED

دستخط ہیڈ ماسٹر

حکومت سندھ، سکول پرائمری، آرڈو بازار، لاہور، ۲۰۰۷

جسٹریٹری مدیرین

گورنمنٹ ہسپتال کراچی
 فروری ۲۰۰۷ء

بابت ماہ

نام جسٹریٹری مدیر
 عہدہ جسٹریٹری مدیر

تاریخ	آمد	دستخط	روائی	دستخط	آمد	دستخط	روائی	دستخط	آمد	دستخط	روائی	دستخط
۱	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط
۲	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط
۳	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط
۴	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط
۵	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط
۶	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط
۷	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط
۸	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط
۹	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط
۱۰	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط
۱۱	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط
۱۲	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط
۱۳	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط
۱۴	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط
۱۵	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط
۱۶	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط
۱۷	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط
۱۸	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط
۱۹	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط
۲۰	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط
۲۱	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط
۲۲	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط
۲۳	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط
۲۴	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط
۲۵	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط
۲۶	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط
۲۷	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط
۲۸	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط
۲۹	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط
۳۰	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط
۳۱	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط	۲	دستخط	دستخط	دستخط

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قسمت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
اتفاقہ												
استحقاق												
بیاری												
میزان کل												

دستخط و مہتمم

جسٹریٹری ایڈیشن (14)

گورنمنٹ ہسپتال خان پور

23

بابت ماہ فروری 2007

نام و پتہ			سٹیشن			سٹیشن			سٹیشن			سٹیشن		
H.T. PST			P.S.T.			P.S.T.			P.S.T.			P.S.T.		
تاریخ	آد	دستخط	روایتی	دستخط	آد	دستخط	روایتی	دستخط	آد	دستخط	روایتی	دستخط	آد	دستخط
1	C/leave													
2	Apr 1/45	Apr 81-												
3	Apr 1/45	Apr 81-												
4	Apr 1/45	Apr 81-												
5														
6	Apr 1/45	Apr 81/2												
7	Apr 1/45	Apr 81-												
8	Apr 1/45	Apr 81-												
9	Apr 1/45	Apr 81-												
10	Apr 1/45	Apr 81-												
11														
12	ON DUTY	C/leave												
13	Apr 1/45	Apr 81-												
14	Apr 1/45	Apr 81-												
15	Apr 1/45	Apr 81-												
16	Apr 1/45	Apr 81-												
17														
18	Apr 1/45	Apr 81-												
19	Apr 1/45	Apr 81/2												
20	Apr 1/45	Apr 81/2												
21	Apr 1/45	Apr 81/2												
22	Apr 1/45	Apr 81/2												
23	Apr 1/45	Apr 81/2												
24	Apr 1/45	Apr 81/2												
25	Apr 1/45	Apr 81-												
26	Apr 1/45	Apr 81-												
27	Apr 1/45	Apr 81-												
28	Apr 1/45	Apr 81-												
29														
30														
31														

میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال
1		1	1		1	2		1	2		2

تقریر
آغاز
بانی
میزان کل

دستخط ہیڈ ماسٹر

حکومت سندھ ریلوے ایجنسی، آرڈر نمبر 14...

رجسٹر حاضر فی اندرین

نورالکرامت و برادر سول خان کراچی

بابت ماہ جنوری 2007

قسم کل
رقم مدار

تاریخ	آمد	دستخط	روائی	دستخط	آمد	دستخط	روائی	دستخط	آمد	دستخط	روائی	دستخط
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Checked at
ADD Circle

Dargah

12/1/07

قسمت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
انفاقہ									
استحقاق									
بیاری									
میزان کل									

دستخط مندرجہ ذیل

گورنمنٹ ہسپتال سول خان پور
جنوری 2007

جنرل حاضر فی انڈین
بابت ماہ

فدالوب H.T
سید فضل حسن P.S-1
محمد خان P.S-1
اعلیٰ خان P.S-1

تاریخ	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط
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31																

قسمت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
تفریح									
اتفاقہ									
استحقاق									
بیاری									
میزان کل									

تقریر

رستخیز حاضری اندیزین

کریکولیم و ایلمیم سیمولیکان کانکوردی

بابت ماه

در کلاس

2006

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نام شهر												
عده												
تاریخ	آمد	دستخط	روائی	دستخط	آمد	دستخط	روائی	دستخط	آمد	دستخط	روائی	دستخط
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تقریر	حال	سابقه	میزان	حال	سابقه	میزان	حال	سابقه	میزان	حال	سابقه	میزان

دستخط مسئول
KACHET
2006

نام			مستحق			مستحق			مستحق			تاریخ
پست			پست			پست			پست			
پست			پست			پست			پست			
P	1145	830	P	1145	830	P	1145	830	P	1145	830	1
P	1145	830	P	1145	830	P	1145	830	P	1145	830	2
P	1145	830	P	1145	830	P	1145	830	P	1145	830	3
P	1145	830	P	1145	830	P	1145	830	P	1145	830	4
P	1145	830	P	1145	830	P	1145	830	P	1145	830	5
P	1145	830	P	1145	830	P	1145	830	P	1145	830	6
P	1145	830	P	1145	830	P	1145	830	P	1145	830	7
P	1145	830	P	1145	830	P	1145	830	P	1145	830	8
P	1145	830	P	1145	830	P	1145	830	P	1145	830	9
P	1145	830	P	1145	830	P	1145	830	P	1145	830	10
P	1145	830	P	1145	830	P	1145	830	P	1145	830	11
P	1145	830	P	1145	830	P	1145	830	P	1145	830	12
P	1145	830	P	1145	830	P	1145	830	P	1145	830	13
P	1145	830	P	1145	830	P	1145	830	P	1145	830	14
P	1145	830	P	1145	830	P	1145	830	P	1145	830	15
P	1145	830	P	1145	830	P	1145	830	P	1145	830	16
P	1145	830	P	1145	830	P	1145	830	P	1145	830	17
P	1145	830	P	1145	830	P	1145	830	P	1145	830	18
P	1145	830	P	1145	830	P	1145	830	P	1145	830	19
P	1145	830	P	1145	830	P	1145	830	P	1145	830	20
P	1145	830	P	1145	830	P	1145	830	P	1145	830	21
P	1145	830	P	1145	830	P	1145	830	P	1145	830	22
P	1145	830	P	1145	830	P	1145	830	P	1145	830	23
ATTESTED											24	
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میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان
			3	2	1	5	5	Nil	17	14	3	

رجسٹر حاضری امدیہ

گورنمنٹ پرائمری سکول خان نژاد

2006

نومبر

ابتداء

مقدمہ			اصل خان اید			مستراح خان اید			مستراح خان اید			مستراح خان اید			تاریخ
دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	
P	✓	✓	✓	145	830	✓	145	830	✓	145	830	✓	145	830	1
P	✓	✓	✓	145	830	C	-	leave	✓	145	830	✓	145	830	2
P	✓	✓	✓	145	830	C	-	leave	✓	145	830	✓	145	830	3
P	✓	✓	✓	145	830	C	-	leave	✓	145	830	✓	145	830	4
															5
P	✓	✓	✓	145	830	C	-	leave	✓	145	830	✓	145	830	6
P	✓	✓	✓	145	830	C	-	leave	✓	145	830	✓	145	830	7
P	✓	✓	✓	145	830	✓	145	830	✓	145	830	✓	145	830	8
															9
P	✓	✓	✓	145	830	✓	145	830	✓	145	830	✓	145	830	10
P	✓	✓	✓	145	830	✓	145	830	✓	145	830	✓	145	830	11
															12
P	✓	✓	✓	145	830	C	-	leave	✓	145	830	✓	145	830	13
P	✓	✓	✓	145	830	✓	145	830	✓	145	830	✓	145	830	14
P	✓	✓	✓	145	830	✓	145	830	✓	145	830	✓	145	830	15
P	✓	✓	✓	145	830	✓	145	830	✓	145	830	✓	145	830	16
P	✓	✓	✓	145	830	✓	145	830	✓	145	830	✓	145	830	17
P	✓	✓	✓	145	830	✓	145	830	✓	145	830	✓	145	830	18
															19
P	✓	✓	✓	145	830	✓	145	830	✓	145	830	✓	145	830	20
P	✓	✓	✓	145	830	✓	145	830	✓	145	830	✓	145	830	21
P	✓	✓	✓	145	830	✓	145	830	✓	145	830	✓	145	830	22
P	✓	✓	✓	145	830	✓	145	830	✓	145	830	✓	145	830	23
P	✓	✓	✓	145	830	✓	145	830	✓	145	830	✓	145	830	24
P	✓	✓	✓	145	830	✓	145	830	✓	145	830	✓	145	830	25
															26
P	✓	✓	✓	145	830	✓	145	830	✓	145	830	✓	145	830	27
P	✓	✓	✓	145	830	✓	145	830	✓	145	830	✓	145	830	28
P	✓	✓	✓	145	830	✓	145	830	✓	145	830	✓	145	830	29
P	✓	✓	✓	145	830	✓	145	830	✓	145	830	✓	145	830	30
															31

میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	
1			1			5			1			4			14	2

Signature
Khan Gul
Principal

تصدیق
مستراح خان اید
مستراح خان اید
مستراح خان اید

گورنمنٹ پرائمری سکول خانگڑھی

بابت ماہ اگست ۲۰۰۶

سید فضل خان ایم اے بی - ایڈ
 نمبر ۱۷

مضمون کل			اجمل خان ایم اے بی - ایڈ			سلم خان ایم اے بی - ایڈ			سید فضل خان ایم اے بی - ایڈ			تاریخ
جو نیدار			نائب مدرس			نائب مدرس			نائب مدرس			
آد	دستخط	رواگی	آد	دستخط	رواگی	آد	دستخط	رواگی	آد	دستخط	رواگی	
P	✓	✓	P	✓	✓	P	✓	✓	P	✓	✓	۲
P	✓	✓	P	✓	✓	P	✓	✓	P	✓	✓	۳
P	✓	✓	P	✓	✓	P	✓	✓	P	✓	✓	۴
P	✓	✓	P	✓	✓	P	✓	✓	P	✓	✓	۵
P	✓	✓	P	✓	✓	P	✓	✓	P	✓	✓	۶
P	✓	✓	P	✓	✓	P	✓	✓	P	✓	✓	۷
P	✓	✓	P	✓	✓	P	✓	✓	P	✓	✓	۸
P	✓	✓	P	✓	✓	P	✓	✓	P	✓	✓	۹
P	✓	✓	P	✓	✓	P	✓	✓	P	✓	✓	۱۰
P	✓	✓	P	✓	✓	P	✓	✓	P	✓	✓	۱۱
P	✓	✓	P	✓	✓	P	✓	✓	P	✓	✓	۱۲
P	✓	✓	P	✓	✓	P	✓	✓	P	✓	✓	۱۳
P	✓	✓	P	✓	✓	P	✓	✓	P	✓	✓	۱۴
P	✓	✓	P	✓	✓	P	✓	✓	P	✓	✓	۱۵
P	✓	✓	P	✓	✓	P	✓	✓	P	✓	✓	۱۶
P	✓	✓	P	✓	✓	P	✓	✓	P	✓	✓	۱۷
P	✓	✓	P	✓	✓	P	✓	✓	P	✓	✓	۱۸
P	✓	✓	P	✓	✓	P	✓	✓	P	✓	✓	۱۹
P	✓	✓	P	✓	✓	P	✓	✓	P	✓	✓	۲۰
P	✓	✓	P	✓	✓	P	✓	✓	P	✓	✓	۲۱
Eid Holiday			تعطیل			تعطیل			تعطیل			۲۲
Eid Holiday			تعطیل			تعطیل			تعطیل			۲۳
Eid Holiday			تعطیل			تعطیل			تعطیل			۲۴
Eid Holiday			تعطیل			تعطیل			تعطیل			۲۵
Eid Holiday			تعطیل			تعطیل			تعطیل			۲۶
P	✓	✓	P	✓	✓	P	✓	✓	P	✓	✓	۲۷
P	✓	✓	P	✓	✓	P	✓	✓	P	✓	✓	۲۸
P	✓	✓	P	✓	✓	P	✓	✓	P	✓	✓	۲۹
P	✓	✓	P	✓	✓	P	✓	✓	P	✓	✓	۳۰
P	✓	✓	P	✓	✓	P	✓	✓	P	✓	✓	۳۱

قسّم جو اتفاقاً بیاری میزان کل کوہ	میزان سابقہ حال 1 1 3	میزان سابقہ حال 1 12 9	میزان سابقہ حال 1 3 3
دستخط ہیڈ ماسٹر		ATTESTED	

جسٹریٹری مدرسیں

گورنمنٹ پبلک ہائی اسکول خان پور کھنڈی سہیل ٹی

۶۸۰۰۰

سپتمبر اکتوبر ابر ماہ

فہرست عمل			اجل خان ایف۔ ایف۔ سی۔ ایف۔ سی۔			مسلم خان ایم۔ ایف۔ سی۔ ایف۔ سی۔			فاضل خان ایم۔ ایف۔ سی۔ ایف۔ سی۔			تاریخ
دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	
P	1040	730	1040	730	1040	730	1040	730	1040	730	1040	1
P	1245	730	1245	730	1245	730	1245	730	1245	730	1245	2
X			X			X			X		X	3
P	1245	730	1245	730	1245	730	1245	730	1245	730	1245	4
P	1245	730	1245	730	1245	730	1245	730	1245	730	1245	5
P	1245	730	1245	730	1245	730	1245	730	1245	730	1245	6
P	1245	730	1245	730	1245	730	1245	730	1245	730	1245	7
P	1040	730	1040	730	1040	730	1040	730	1040	730	1040	8
P	1245	730	1245	730	1245	730	1245	730	1245	730	1245	9
P	1245	730	1245	730	1245	730	1245	730	1245	730	1245	10
P	1245	730	1245	730	1245	730	1245	730	1245	730	1245	11
P	1245	730	1245	730	1245	730	1245	730	1245	730	1245	12
P	1245	730	1245	730	1245	730	1245	730	1245	730	1245	13
P	1245	730	1245	730	1245	730	1245	730	1245	730	1245	14
P	1245	730	1245	730	1245	730	1245	730	1245	730	1245	15
P	1245	730	1245	730	1245	730	1245	730	1245	730	1245	16
P	1245	730	1245	730	1245	730	1245	730	1245	730	1245	17
P	1245	730	1245	730	1245	730	1245	730	1245	730	1245	18
P	1245	730	1245	730	1245	730	1245	730	1245	730	1245	19
P	1245	730	1245	730	1245	730	1245	730	1245	730	1245	20
P	1245	730	1245	730	1245	730	1245	730	1245	730	1245	21
P	1245	730	1245	730	1245	730	1245	730	1245	730	1245	22
P	1245	730	1245	730	1245	730	1245	730	1245	730	1245	23
P	1245	730	1245	730	1245	730	1245	730	1245	730	1245	24
P	1245	730	1245	730	1245	730	1245	730	1245	730	1245	25
P	1245	730	1245	730	1245	730	1245	730	1245	730	1245	26
P	1245	730	1245	730	1245	730	1245	730	1245	730	1245	27
P	1245	730	1245	730	1245	730	1245	730	1245	730	1245	28
P	1245	730	1245	730	1245	730	1245	730	1245	730	1245	29
P	1245	730	1245	730	1245	730	1245	730	1245	730	1245	30

میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال
			1			1			Nil	Nil	Nil	9	8	1			

۹/۱۰/۰۶
 ۹/۱۰/۰۶
 ۹/۱۰/۰۶

E-18
5-13

OFFICE OF THE DY: DISTRICT OFFICER
(Male) SAMANIZAI AT DARGAI.

No. _____ / Dated. _____ / 2010.

To.

The Executive District Officer
(E & S) Education Malakand at Bat Khela.

Subject:-

EARNED LEAVE SANCTION.

Memo:-

Sanction may kindly be accorded for the grant of earned leave with out pay w.e.f 1/9/2007 to 31/8/2010 (1218 days) in favour of Mr. Ajmal Khan P.S. T.G.P.S. Khan Garhi.

His original application alongwith S/Book and leave app account preferred for favour of further necessary action please.

Dy: District Officer Education
(Male) SAMANIZAI, at DARGAI.

ATTESTED

ATTESTED

F-19
حکومت جناب دسترخط ایجوکیشن (میل) دسترخط سلاکونڈ

درخواست نمبر اد: تو سبھی چھٹی

جناب عالی

مؤدبانہ گزارش کی جاتی ہے۔ کہ سائل نے اس سے پہلے چھٹی کی درخواست دی تھی جو کہ منظور نہ ہوئی تھی۔ چھٹی چھٹی نظام ہوئی تھی۔ جو حکام بالانے بڑے خوش اسلوبی کے ساتھ 2007 سے 2010 تک منظور کروائی تھی۔ اب چونکہ چھ اور چھٹی کی اسٹڈی رپورٹ ہے اس لیے اس صاحبان سے التماس ہے کہ بندہ کو اور دو سال کی چھٹی دینے کے احکامات صادر فرمائیں۔
(دو چھٹی و سرفارہ لغت 2)

مورخہ 03/09/2010

العارضین

آل کافرا نہووا

ATTESTED



احسان

PTC
گورنمنٹ ڈپارٹمنٹ سکول
ضلع کوٹلی درانی
ملکنڈ

Education Management Information System (EMIS)

Schools & Literacy Department, Government of N.W.F.P.

Teachers Information System (Year 2006-07)

20

6/20/06
17/11/06

School Code: 19902 School Name: G.P.S. KHAN GARHAI
 Union Council: Sakha Kot Khassi Tehsil: Dargai District: Mala Kand

A. Personal Information

1. Old N.C. Card No: 117-93-107395
 2. New N.C. Card No: 98406-0161422-1
 3. Teacher's Name: ATMAL KHAN 4. Gender: MALE
 5. Father's/Husband's Name: ZARIF KHAN 6. Date of Birth: 26/10/1973
 7. Date of First Appointment: 21/02/2006 8. Designation of First Appointment: P.S.T.
 9. Present Designation: P.S.T. 10. Present BPS: 07 11. Date of joining the Present Post: 01/08/2006
 12. Academic Qualification: 02 (1=Matric, 2=FA/FSc, 3=BA/BSc, 4=MA/MSc, 5=M.Phil, 6=Ph.D)
 13. Professional Qualification: (1=Yes, 2=No) 01 02 02 02 02 02 (M.T, C.T, B.Ed, M.Ed, M.A.Edu, Others)
 14. Marital Status: (1=Married, 2=Single) 01
 14(a) Is your wife/husband working in Govt Dept? (1=Yes, 2=No) 02 14(b) Designation: P.S.T.
 15. Permanent Address: PALOTAL ZARIF ABAD P/O SAKHA KOT
Teh: Dargai Mala Kand Agency
 16. Distance between permanent residence & School (In KM): 04 (1=0 to 16, 2=17 to 50, 3=51 and above)
 17. District of Domicile: Mala Kand 18. Phone No. 31192 MB:-03018195982

B. Service Record (Please fill from most Recent to Earliest only for the last 6 transfers/postings)

S.#	Post	BPS	School and District Name	From Date	To Date
1.	<u>P.T.C.</u>	<u>07</u>	<u>G.P.S. KHAN GARHAI</u>	<u>01/08/2006</u>	
2.					
3.					
4.					
5.					
6.					

C. In-Service Trainings

S.#	Post	BPS	Training/Course Name	From Date	To Date
1.					
2.					
3.					
4.					

I declare that all the information given above are correct

ATTESTED

Teachers Signature: [Signature]
 Dated: 17/11/2006

Principal/Head Master/Headress/UPC/In-charge Signature

Countersigned by EDO/DO(M/F)
 Dated: 17/11/2006

حکومت صائب ڈیپارٹمنٹ (انجینئرنگ) آفیسر (میل) ڈیپارٹمنٹ

G-21

دروازہ لکھنؤ
Arrival

صائب ڈیپارٹمنٹ

شردیانہ ڈیپارٹمنٹ کی طرف سے سائل کو
کو 730 دن کی چھٹی دکھائی گئی تھی سائل کی چھٹی آج
مورخہ 4/9/2013 کو مکمل ہو گئی ہے اس لیے
2 سائل دوبارہ سے اپنی ڈیپارٹمنٹ پر آیا ہے
1 سائل آج صائب سے اپنی ڈیپارٹمنٹ سے
دیں آج ڈیپارٹمنٹ کی Arrival سے پہلے ہیوں
منظور فرمائیں۔

العارضہ

مورخہ 4/9/2013

آپ کا لکھنؤ فرمان

TESTED

اجمل حسن
- PST



محکمہ تعلیم صاحب (E&SE) ایستادہ

H-22

درخواست: محکمہ ایجنسی / درخواست برائے منظوری
جارج ریلورٹ

جناب عالی!

مؤدبانہ گزارش کی جاتی ہے کہ سائل محکمہ تعلیم میں آب
کے زیر سایہ پلوٹل سٹیشن سٹیشن میں بطور پرائمری سکول تعمیر
کام کر رہا ہے۔ سائل کو مختلف ادوار میں آب دھنور والا کی طرف
سے چھٹی عطا ہوئی تھی جو وقتاً فوقتاً اس میں توسیع ہوئی تھی۔
جو کہ بعد میں 2013 کو سہری دوسری 730 دن کی چھٹی مکمل ہوئی
میں نے اپنی ڈیوٹی پر حاضر ہونے کے لئے Arrival دی جو کہ
بعد میں چھ مہینے بعد میں درخواست پر کوئی عمل دخل نہیں ہوا
ہے۔

لہذا اس درخواست کو منظور فرمائے اور اسے Arrival منظور
فرمائیں سائل کو ڈیوٹی کرنے سے تازہ روکے سائل کو بطور
آرٹھنگور و مینون ریفوگ گا۔

العارض

ATTESTED

انجیل خان

PST,

۹

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

APPEAL NO. _____/2018

I-23

Mr. Ajmal Khan, PST (BPS-12),
GPS Khan Gharai, Sakhakot, Tehsil Dargai, District Malakand.
..... **Appellant**

VERSUS

- 1- The Government of Khyber Pakhtunkhwa through Secretary (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The District Education Officer (M), District Malakand.
..... **Respondents**

**APPEAL UNDER SECTION 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974
AGAINST THE INACTION OF THE RESPONDENT
NO.3 BY NOT ALLOWING THE APPELLANT TO
SUBMIT HIS ARRIVAL REPORT AS PRIMARY
SCHOOL TEACHER AND AGAINST NOT TAKING
ACTION ON THE DEPARTMENTAL APPEAL OF THE
APPELLANT WITH IN THE STATUTORY PERIOD OF
NINETY DAYS**

PRAYER:

That on acceptance of this appeal the respondents may very kindly be directed to allow the appellant to submit his charge report as P.S.T (BPS-12). Any other remedy which this august Tribunal deems fit may also be awarded in favor of the appellant.

ATTESTED

R/SHEWETH:

ON FACTS:

1. That appellant is the bonafide resident of PaloTal, P/O Sakhakot, Tehsil Dargai, District Malakand and belongs to respectable family. Copy of NIC is attached as annexure **A.**
2. That the appellant was appointed as primary school Teacher (BPS-07) now BPS-12 on the recommendation of proper Departmental selection committee in the respondent Department vide order dated 6.11.2004. That in response the appellant submitted his charge report at GPS Khan Gharai, District Malakand on the very next day and started performing

his duty quite efficiently and to the entire satisfaction of his superiors. Copies of the appointment order, service book & attendance register are attached as annexure B, C & D.

3. That during service the appellant submitted an application for extra ordinary leave with out pay which was accepted by the concerned authority and as such the appellant was awarded/granted leave without pay. Copy of the leave order is attached as annexure E.

4. That after expiry of the said leave the appellant submitted another application for extension of his leave in the year 2007 but no response was received form the concerned quarter. Copies of the extension of leave application and other connected document are attached as annexure F.

5. That on expiry of the said leave the appellant submitted his arrival report to the District Education Officer District Malakand but in response the concerned authority refused the same on the reason best known to the said authority. That then after the appellant time and again requested the concerned authority for his adjustment as primary school teacher but no heed was paid to the request of the appellant. Copy of the arrival report is attached as annexure G.

6. That it is very pertinent to mention that during the said period no adverse order has been issued by the concerned authority against the appellant nor the appellant was informed by the concerned authority that his application for extension of his leave has been rejected.

7. That feeling aggrieved the appellant filed Departmental appeal before respondent No.3 but no reply has been received so for. Hence the present appeal on the following grounds amongst the others. Copy of the Departmental appeal is attached as annexure H.

GROUND:

A- That not adjusting the appellant on the post of Primary school teacher with all back benefits by the concerned authority is against the law, facts and norms of natural justice.

B- That the appellant has not been treated by the concerned authorities in accordance with law and rules on the subject noted above and as such the concerned authorities violated article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.

ATTESTED



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- C- That the concerned Department acted in arbitrary and malafide manner by not allowing the appellant to submit his arrival report on the post of primary school teacher.
- D- That no adverse order has been passed/ issued by the respondents against the appellant, therefore under the law the appellant is entitled to be adjusted against the post of PST.
- E- That after arrival the respondents even not bothered to conduct inquiry in the matter of appellant and thus the appellant was kept in hanging position till date.
- F- That till date the respondents kept the appellant in hanging position and as such the respondent No.3 is not willing to adjust the appellant on the post of PST.
- G- That valuable rights of the appellant have been accrued, therefore under the prevailing rules the appellant is entitled to be adjusted on the post of primary school teacher with all back benefits.
- H- That appellant has school going children and have no other source of income to support his family, therefore the principle of natural justice demands that the appellant be allowed to resume his duty as P.S.T.
- I- That the appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

Dated: 27.11.2018

ATTESTED

APPELLANT


AJMAL KHAN

THROUGH:


NOOR MOHAMMAD KHATTAK


MUHAMMAD MAAZ MADNI
ADVOCATE

جناب ڈسٹرکٹ ایجوکیشن آفیسر ملتان ڈسٹرکٹ ایجوکیشن

درخواست برائے فراہمی ٹرینیشن کاپی آرڈر

جناب عالی! حور بانو زارشن کی جاتی ہے کہ میرے

عدم موجودگی میں مرا ٹرینیشن آرڈر یو جیک ہے

جس کا کاپی ابھی تک مجھے حصول نہیں چکا ہے۔

لہذا آپ صاحبان مہربانی کر کے مجھے میرے

termination order کا کاپی دیکر سکون

فرمائیں۔

درخواست گزار

Handwritten signature

(26/4)

احمل خان بولد طرف خان

سمنہ سنا کوٹ

مدرسہ 26/04/2019

Provide
Handwritten signature
26/4/19

ATTACHED

Handwritten mark



(12)

~~Amir~~ (18)
K - (27)

**OFFICE OF THE
DISTRICT EDUCATION OFFICER (MALE)
MALAKAND**
(Phone # 0932-410281)


NOTIFICATION:

1. Whereas, Mr. Ajmal Khan PST GPS Khan Garhi Sakhakot Malakand had been absent from his duty since 01-09-2007.
2. And whereas, attendance notices were served upon him on his home address vide EDO (M) Malakand letter No:879 dated 11-02-2008 and letter No. 5127-28 dated 27-05-2008 to resume his duty, however, he badly failed to respond to the above mentioned letter.
3. And Whereas, the disciplinary proceedings could not be completed against Mr. Ajmal Khan PST GPS Khan Garhi well within the prescribed time due to the insurgency in Malakand Division.
4. And Whereas, to fulfill the requirements of natural justice, an inquiry was ordered vide this office Endst; No.108140-43 dated 13-11-2018 to probe into the matter.
5. And Whereas, the inquiry officer, Mr Fida Muhammad Principal GZS High School Dargai, Malakand after having examined the charges, evidence on the record submitted the report on 29-01-2019.
6. And whereas, the authority having considered the charges, evidence on the record as per report of the Enquiry Officer, is of the view that the willful continuous absence period of Mr. Ajmal Khan PST GPS Khan Garhi, Sakhakot Malakand is more than Five (05) years.
7. Now, Therefore, in exercise of the powers conferred by the para, 4 (c) of S&GAD letter No. SOR II(S&GAD) 6(37)/89, dated 03-10-1989, read with section 16, of the Khyber Pakhtunkhwa Civil Servant Act, 1973, the Competent Authority is pleased to declare the services of Mr. Ajmal Khan PST GPS Khan Garhi, Sakhakot Malakand as terminated, hence he has been no more an employee of E&SE Department since 01-09-2007.

(Muhammad Uzair Ali)
District Education Officer (Male)
Malakand

Endst; No. 1290-97 /DEO (M) Mkd/Estab; Prry/Ajmal Khan Ex PST, Dated Malakand the 31/01/2019
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2. District Accounts Officer Malakand.
3. SDEO (M) Sub Division Dargai.
4. ASDEO (M) Circle concerned.
5. Primary School Head Teacher GPS Khan Garhi, Sakhakot Malakand.
6. Mr. Ajmal Khan EX-PST GPS Khan Garhi, Sakhakot Malakand.
7. ADEO Estab Primary Local Office
8. Master File


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L-28

The Director,
E&SE Department,
Khyber Pakhtunkhwa, Peshawar.

Subject: **DEPARTMENTAL APPEAL AGAINST THE IMPUGNED ORDER DATED 31.01.2019 COMMUNICATED TO THE APPELLANT THROUGH APPLICATION ON 26.4.2019 WHEREBY THE APPELLANT HAS BEEN REMOVED FROM SERVICE.**


Respected Sir,

Most humbly I beg to submit that the appellant was appointed as Primary School Teacher (BPS-12) before your good self Department vide order dated 31/7/2006. That after appointment the appellant submitted his charge report and started performing his duty and right from appointment the appellant had served the respondent Department quite efficiently and upto the entire satisfaction of his superiors. That during service the appellant submitted an application for extra ordinary leave without pay which was accepted by the concerned authority and as such the appellant was awarded/granted leave without pay. That after expiry of the said leave the appellant submitted another application for extension of leave on 03.09.2010 but no response was received from the concerned authority and after expiry of the said leave the appellant submitted his arrival report to the DEO District Malakand but in response the concerned authority refused the same on the reason best known to the said authority. That then after the appellant time and again requested the concerned authority for his adjustment as Primary School Teacher but no heed was paid to the request of the appellant. That appellant feeling aggrieved filed Departmental appeal followed service appeal submitted before the august Service Tribunal, Peshawar but during the pendency it came into the knowledge of the appellant that he was removed from service vide order dated 31.01.2019 and the same communicated to the appellant through his application on 26.04.2019. Appellant feeling aggrieved from the impugned order dated 31.01.2019 preferred this Departmental appeal before your good self.

It is therefore, most humbly prayed that on acceptance of this Departmental appeal the impugned order dated 26.04.2019 may very kindly be set aside and the appellant may be re-instated into service with all back benefits. Any other remedy which your good self deems fit that may also be awarded in favor of the appellant.

Dated: 07.05.2019.

Your Obediently


AJMAL KHAN, EX-PST,
GPS Khan Gharai, Sakhakot,
District Malakand

ATTACHED



VAKALATNAMA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

_____ OF 2019

AJMAL KHAN

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

EDUCATION DEPARTMENT

(RESPONDENT)
(DEFENDANT)

I/We Ajmal Khan

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. 19/08/2019



CLIENT



ACCEPTED

NOOR MOHAMMAD KHATTAK

KAMRAN KHAN

&



MIR ZAMAN SAFI
ADVOCATES

OFFICE:

Flat No.3, Upper Floor,
Islamia Club Building, Khyber Bazar,
Peshawar City.
Mobile No.0345-9383141