

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

Service Appeal No 2005/2022

Muhammad Uzair Ali.....Appellant

VERSUS

Govt of KPK & others.....Respondents

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Through:

Appellant

P3
NGOR MUHAMMAD KHATTAK
Advocate, Supreme Court

-1-

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

APPEAL NO.2005/2022

MUHAMMAD UZAIR AL VS GOVT; OF KPK & OTHERS

**REJOINDER ON BEHALF OF THE APPLICANT IN RESPONSE TO THE
COMMENTS SUBMITTED BY THE RESPONDENT NO.07 (Mst. Samina Altaf)**

Respectfully Sheweth,

Khyber Pakhtukhwa
Service Tribunal

Diary No. 11195

Dated 16-02-2024

Counter reply to the Preliminary Objections.

- I. Incorrect Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 and Section-22 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 put no bar on this appeal as clearly stipulated in Section-4 (a) of KP Service Tribunal Act, 1974 and Section-22 (1) & (2) of KP Civil Servants Act, 1973 **as the appeal pertains to inter-se-seniority and not to the fitness to appointment or to holding of a particular post or to promotion.** Famously, the impugned Tentative Seniority List, which has again been circulated without addressing the appeal as per the prescribed Rule-17 (1) (a) of APT Rules, 1989 in respect of the appellant, is an indication of unjust and faulty/wrong line of thinking of the respondent department which has the potential to harm the legitimate interests of the appellant and which will not only deprive him of his legitimate seniority order fixed/determined by the Public Service Commission as per inter-se-merit but will also deprive him of his legitimate progression in service career.
- II. True to the extent of not being notified yet but not to the extent of Section-8 (5) of the Khyber Pakhtunkhwa Civil Servants Act, 1973 (N.W.F.P. Act No. XVIII of 1973) which clearly provides ***"The seniority lists prepared under sub-section (1), shall be revised and notified in the official Gazette at least once in a calendar year, preferably in the month of January"***. Furthermore, by not addressing the appeal of the appellant within stipulated period of 90 days and recirculating the same vide No.SO(MC)E&SED/4-24/2023/Tentative Sen. List MC BS-19(Male & Female) dated:23rd October, 2023 without addressing his appeal is clear indication of wrong thinking on part of the respondent department which has the potential of harming the legitimate interests of the appellant and which, therefore, necessitates the intervention of this Honorable Service Tribunal as the respondent department while compiling/circulating the tentative seniority list has violated the following Articles, provisions of law and rules:
 - a. Article-4 & Article-25 of the Constitution of the Islamic Republic of Pakistan, 1973.
 - b. Section-8 (1), (2), (3) & (5) of the Khyber Pakhtunkhwa Civil Servants Act, 1973, &
 - c. Rule-17 (1) (a) of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989.
- III. Correct that nothing therein contained in Section-8 of Civil Servants Act, 1973 which shall be construed to confer any vested right to a particular seniority in such service, cadre or post, **therefore, this Honorable Tribunal is appealed to prevent the respondent department/Govt. from not allowing vested right to a particular category or particular person/s against the prescribed Rule-17 (1) (a) of the KP APT Rules, 1989 made in pursuance Section-8 (3) of KP Civil Servants Act,1973.**

- IV. Incorrect. Instead, Section-4 (a) of KP Service Tribunal Act, 1974 provides for legal remedy against the inaction of the departmental authority it fails to decide appeals within stipulated period of 90 days in cases that involves the legitimate interests of appellants. In the instant case, the faulty tentative seniority contains every potential to harm the legitimate interests of the appellant while the departmental authority sticks to its wrong line of thinking by not have addressed the appeal in accordance with prescribed Rule-17 (1) (a) of the APT Rules, 1989 within stipulated period of 90 days. Moreover, the instant case, contrary to Section-4 (b) (i) of Khyber Pakhtunkhwa Service Tribunal Act, 1974, pertains to seniority with prescribed Rule-17 (1) (a) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989.
- V. Incorrect. The departmental authority has not only lent deaf ears to the appeals of the appellant but has also violated Rule-17 (1) (a) of the APT Rule, 1989 as well as Section-8 (5) of the Civil Servants Act, 1973 which simultaneously creates cause of action and make the same maintainable for this Honorable Tribunal.
- VI. Incorrect. The appellant has got legitimate right to file this instant appeal before this Honorable Tribunal as the Tentative Seniority List contains every potential to harm the legitimate interests of the appellant while his appeal has not been addressed within stipulated period of 90 days.
- VII. Incorrect. The appellant has not hidden any important information from the Honorable Tribunal.

Counter reply to Facts:

- 1. Needs no reply.
- 2. No comments.
- 3. Correct. However, the 27th post subsequently added was wrongly allocated to the Teaching Cadre instead of placing the same in the Open Market Quota for simple mathematical reason/decision as follows:

Total Post = 27

Share of Teaching Cadre@60% = 27 X 60/100 =16.2

Share of Open Market@40% = 27 X 40/100 = 10.8

Hence, post number 27th has wrongly/backhandedly been allocated to Teaching Cadre as the share of Open Market is greater than the share of Teaching Cadre as per percentage of total number of posts which, therefore, needs to be corrected for placement of the respondent No.07 in the Open Market Quota.

- 4. Needs no reply.
- 5. The services of the appellant were properly requisitioned and posted as DEO Management Cadre after accepting/granting lien in this respect by the competent authority. **Annex-A (Paras-14, 15, 16 & 17)**
- 6. Needs no reply.
- 7. Needs no comment.
- 8. Correct but the referred merit list was not the inter-se-merit nor it was intended by the Commission for notification of inter-se-seniority by the Govt. **(Annex-B)**. Instead, it was meant for Quota-wise separate merit positions of selectees in their own category. In fact,

the inter-se-seniority was duly communicated by the Commission to the respondent department/Govt. vide No.SR1/036824 dated 02/08/2012 (**Annex-C**) whereas the respondent departments/Govt. without waiting for inter-se-merit hastily notified inter-se-seniority on 08.05.2012 to favour blue eyed officers (**Annex-D**). Furthermore, **the stance of respondent No.07 has also not been supported by the reply of the Khyber Pakhtunkhwa Public Service Commission wherein it has itself clarified the inter-se-merit position of the appellant well above the respondent No.07 by confirming the appellant at inter-se-merit position No.16 and that of respondent No.07 at 27th**. The inter-se-seniority 2012 and 2013 have been attached with the reply of the Commission for ready reference. Conversely, the commission has not even mentioned the letter which the respondent No.07 has referred to.

9. Rejoining of the post does not deprive him of his seniority position and the appellant has the legal right to plead for his seniority in accordance with prescribed Rule-17 (1) (a) of APT 1989 being civil servant.
10. The competent authority is bound under Section-8 (5) of the Civil Servants Act, 1973 which makes it mandatory/obligatory that *"The seniority lists prepared under sub-section (1) shall be revised and notified in the official Gazette at least once in a calendar year,*". Furthermore, the appellant did not need to hide or conceal anything as his request was actually granted for inclusion in the seniority list by directing the Director E&SE accordingly.
11. Needs no reply.
12. The seniority List of Management Cadre Officers (BS-19) notified in 2012 is not final in respect of the appellant as he was not included in that list.
13. Incorrect. The seniority position of the appellant is not based on self-analysis rather the same is exactly in accordance with the inter-se-merit/seniority as determined and attached by the Public Service Commission along with its reply to the Appeal of the appellant.
14. Incorrect. The appellant is not confusing the tentative seniority dated 16.03.2022 issued by the respondent department without addressing the grievances of the appellant within stipulated period of 90 days which clearly contains the potential to harm the legitimate interests of the appellant, hence, it is not barred within the meaning of Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act *ibid*.
15. Wrong. All the relevant record has been placed on file before this Honorable Tribunal.
16. No comment.
17. Correct as the respondent No.07 has conceded the Para pertaining to the extent of inter-se-seniority of SDEOs (BPS-17) and DDEOs (BPS-19) and to the extent of seniority of DEOs not yet finalized but the respondent department by not addressing the grievances of the appellant within stipulated period of 90 days has left the future career of the appellant to extreme jeopardy as the impugned tentative seniority contains potentials to harm the legitimate interests of the appellant as a result of faulty and wrong thinking of the respondent department.
18. & 19. Incorrect as amply clarified in above paras.

Counter-reply as the Reply to Grounds:

- A. Ground-A of the reply of respondent No.07 is not correct in that the appeal against the impugned tentative seniority is certainly maintainable under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 as the appellant's appeal has not been addressed by the respondent department/s within the stipulated period of 90 days whereas the

impugned tentative seniority list contains harmful potentials to the legitimate interests of the appellant as civil servant.

B. & C. Grounds-B & C of the reply is also self-convenient as the appellant has not been treated equally visa vis similarly placed selectees/appointees in violation of Article-4 and Article-25 of the Constitution of the Islamic Republic of Pakistan, 1973.

D. Ground-D of the reply is correct to the extent that the tentative seniority has not been notified yet but by not addressing the appeal of the appellant within stipulated period of 90 days is clear indication of the wrong thinking of the Govt. which may harm the legitimate interests of the appellant.


E&F. Grounds-E&F of the reply are not correct.

G. Ground-G of the reply needs no counter reply.

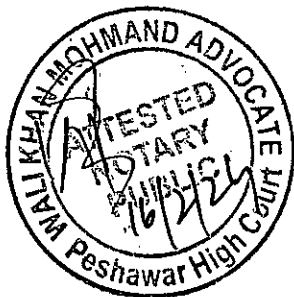
It is therefore, prayed that the reply of the respondent No.06 may be summarily rejected by granting/accepting this appeal for correct seniority in accordance with the established rules of inter-se-seniority of the civil servants as stipulated in Rule-17 (1) (a) of APT Rules, 1989.



Applicant

Through


NOOR MUHAMMAD KHATTAK
ADVOCATE SUPREME COURT

I, Muhammad Uzair Ali DEO (Male) Khyber, do hereby solemnly affirm and declare on Oath that the contents of this **Rejoinder** are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Honorable Court.




DEPONENT



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Annex-A

-5-

SUMMARY FOR CHIEF MINISTER KHYBER PAKHTUNKHWA

Subject: - REQUEST FOR PERMISSION TO CONTINUE SERVICE IN HIGHER EDUCATION DEPARTMENT AND RELIEVING FROM THE POST OF EDO E&SE DEPARTMENT.

Mr. Muhammad Uzair Ali was appointed as Lecturer (Political Science) (BS-17) on the recommendations of Khyber Pakhtunkhwa Public Service Commission and posted as Lecturer (BS-17) at Government College Oghi Mansehra vide Government of NWFP (Now Khyber Pakhtunkhwa) Education Department notification dated 22-10-1995 (F/A).

2. He applied for the post of Executive District Officer (BS-19) E&SE Management Cadre through proper channel and was recommended by the Khyber Pakhtunkhwa Public Service Commission for the same post. He was appointed by the E&SE Department as Executive District Officer (BS-19) E&SE Management Cadre and posted as EDO (BS-19) E&SE District Mardan vide this department notification dated 24-02-2011 (F/B) but later on he was adjusted as EDO (BS-19) E&SE Nowshera vide this department notification dated 31-03-2011 (F/C). He took over charge of the post of EDO (BS-19) E&SE Nowshera on 01-04-2011 and later on relinquished the charge of the post of EDO (BS-19) E&SE Nowshera on 19-07-2011 on his appointment as Associate Professor in Higher Education Department (F/D). The E&SE Department issued him a notice to resume duty as EDO E&SE Nowshera, since he had relinquished the charge of EDO (BS-19) E&SE Nowshera without prior permission of this department (F/E). In compliance, he resumed charge of the post of EDO E&SE Nowshera w.e.f. 27-08-2011 but later on the E&SE Department directed him to report to this department vide letter dated 29-08-2011 (F/F). Meanwhile, he had also applied for the post of Associate Professor (BS-19) Higher Education Department through proper channel and was recommended by the Khyber Pakhtunkhwa Public Service Commission for appointment against the same post. The Higher Education Department has appointed him as Associate Professor (BS-19) and posted at Government Degree College Yar Hussain District Swabi vide notification dated 21-08-2011 (F/G).

3. Now Mr. Muhammad Uzair Ali, EDO (BS-19) E&SE Management Cadre (OSD) has approached this department and requested that he wanted to continue his service as Associate Professor (BS-19) in Higher Education Department and he may be allowed to join the Higher Education Department on appointment as Associate Professor (BS-19) w.e.f. 19-07-2011. He has neither been adjusted against any post since reporting back to the E&SE Department nor he has drawn any salary since 19-07-2011.

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ATTESTED

4. The Elementary & Secondary Education Department, therefore, proposes that Mr. Muhammad Uzair Ali, EDO (BS-19) E&SE Nowshera Management Cadre may be relieved w.e.f. 19-07-2011 to enable him to join his new assignment as Associate Professor (BS-19) in Higher Education, Archives and Libraries Department and also draw pay & allowances from the said Department.

-6-

5. The Chief Minister Khyber Pakhtunkhwa is, therefore, requested to kindly approve proposal contained in Para-4 above please.

Mushtaq Jadoon
(MUHAMMAD MUSHTAQ JADOON)
Secretary to Govt. of Khyber Pakhtunkhwa
Elementary & Secondary Education
Department

Chief Secretary,
Khyber Pakhtunkhwa

6. Please examine.

Approved
15.10.2011
CHIEF SECRETARY

SECRETARY ESTABLISHMENT

~~ATTESTED~~

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-7-

7. Proposal contained in para-4 of the summary is endorsed for approval of the Chief Minister, Khyber Pakhtunkhwa.

[Signature]
(Muhammad Arifeen)
Secretary Establishment
October 22, 2011

Chief Secretary,
Khyber Pakhtunkhwa.

CHIEF MINISTER

[Signature]
25.10.2011
(GHULAM DASTGIR)
CHIEF SECRETARY

8. *Approved.*

[Signature]

[Signature]
27-10-11
CHIEF SECRETARY
KHYBER PAKHTUNKHWA

SECRETARY EESE

[Signature]
27.10.2011
Chief Secretary
Govt. of Khyber Pakhtunkhwa

LD13

P.T.O

ATTESTED



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

-8-

SUMMARY FOR CHIEF MINISTER KHYBER PAKHTUNKHWA

SUBJECT: - THROUGH PROPER CHANNEL REVERSION/ LIEN.

Para-8 of the Summary refers:-

9. Mr. Muhammad Uzair Ali, Ex- Executive District Officer (BS-19) (E&SE) Management Cadre (OSD) was appointed as Associate Professor (BS-19) in Higher Education, Archives & Libraries Department on the recommendations of the Khyber Pakhtunkhwa Public Service Commission and posted at Government Degree College Yar Hussain District Swabi vide notification dated 21-06-2011(F/G). He was properly relieved of his services w.e.f. 19-07-2011 to join his new assignment vide notification dated 31-10-2011 (F/J).

10. Now Mr. Muhammad Uzair Ali, Associate Professor Higher Education, Archives & Libraries Department has requested to rejoin the E&SE Department as DEO (BS-19) in the Management Cadre (F/K).

11. The Elementary & Secondary Education Department requests the Chief Minister Khyber Pakhtunkhwa to allow Mr. Muhammad Uzair Ali, Associate Professor (BS-19) Higher Education Department to rejoin Elementary & Secondary Education Department as DEO (Male) (BS-19) in the Management Cadre.

12. Proposal contained in Para-11 above is submitted for orders/ approval of Chief Minister Khyber Pakhtunkhwa.

Janday aygo

SECRETARY
Elementary & Secondary Education Department
Khyber Pakhtunkhwa

29th Aug, 2013

Minister for E&SE
Khyber Pakhtunkhwa.

Chief Secretary,
Khyber Pakhtunkhwa.

Chief Minister,
Khyber Pakhtunkhwa.

29-8

Minister for Elementary &
Secondary Education
Khyber Pakhtunkhwa

Pl. examine.

M. Akbar

13-

Sery lefted.

P.T.O

3/8
Chief Secretary
Govt. of Khyber Pakhtunkhwa

ATTESTED

14. Summary has been examined. It needs to be clarified as to whether the officer had requested for retention of lien in Elementary & Secondary Education Department while joining Higher Education Department or otherwise.

(Signature)
(Sikander Qayyum)
Secretary Establishment
September 10, 2013.

Chief Secretary,
Khyber Pakhtunkhwa.

15.

ll. clairgy

Sery. ETSE

(Signature)
Chief Secretary
Govt. of Khyber Pakhtunkhwa

ASE

(Signature)
30/9

ATTESTED



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

-10-

SUMMARY FOR CHIEF MINISTER KHYBER PAKHTUNKHWA

SUBJECT: - THROUGH PROPER CHANNEL REVERSION/ LIEN.

Para-15 of the Summary refers:-

16. Mr. Muhammad Uzair Ali, Ex- Executive District Officer (BS-19) (E&SE) Management Cadre had requested for grant of lien for two years while joining Higher Education, Archives & Libraries Department (F/M).

17. Proposal contained in Para-11 above is re-submitted for orders/ approval of Chief Minister Khyber Pakhtunkhwa.

Junday
SECRETARY 18th Sep. 2013.
Elementary & Secondary Education Department
Khyber Pakhtunkhwa.

Minister for E&SE
Khyber Pakhtunkhwa.

Chief Secretary,
Khyber Pakhtunkhwa.

Chief Minister,
Khyber Pakhtunkhwa.

M. A. Khan
22/9.
Chief Secretary
Govt. of Khyber Pakhtunkhwa

18.

*Para 11 approved. His posting in Nowshera as
DEO is also approved.*

Pervez M. Khan
26.09.2013
CHIEF MINISTER
KHYBER PAKHTUNKHWA

C.F.

M. A. Khan
Chief Secretary
Govt. of Khyber Pakhtunkhwa
26/9.

SECRETARY E&SE

ASE

Junday
30/9

ATTENDED

R-1063

-11-

The secretary,
E&SE Khyber Pakhtunkhwa Peshawar.

Subject: Application for Lien

Respectfully stated that I served as EDO in the E&SE Department of Khyber Pakhtunkhwa from 15/5/2011 to 19/7/2011. Now I have been appointed as Associate Professor of Political Science through proper channel by the Higher Education Department Khyber Pakhtunkhwa vide notification No SO(AO)HE/X111-1/11 Political Science (BPS-19) Dated 21/6/2011. Sir I am joining the Higher Education Department and would request you to allow me join the new department on two years lien basis.

I shall be very grateful to you for this great favour. Thanks.

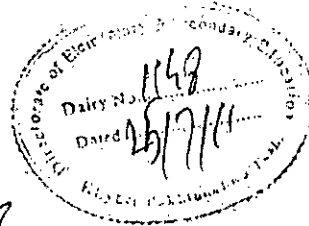
Muhammad Uzair Ali
Outgoing EDO
E&SE Deptt: Nowshera

Encl: No: 2867-44 Dated: 20/7/2011

Forwarded for necessary action, please.

- Copy forwarded for information an n/a to;
- 1 PS to Minister for E&SE Khyber Pakhtunkhwa Peshawar.
- 2 Directress E&SE Khyber Pakhtunkhwa Peshawar.
- 1 Officer concerned.
- 1 Office copy

Executive District Officer
E&SE Nowshera



JL

Attested
y

-12-

~~AB~~
10/02/12

Telephone: 9213750



From: Secretary
Khyber Pakhtunkhwa, Public Service Commission
Peshawar

To:

The Secretary to Govt. of Khyber Pakhtunkhwa,
Elementary and Secondary Education
Peshawar

No. KPK/PSC/ EDO/ 005575 Dated 10/02/2012

Subject: REVISED MERIT OF EXECUTIVE DISTRICT OFFICER
(B-19) OF ADVERTISEMENT NO.05/2009.

Dear Sir,

I am directed to refer to your letter No.1044 Dated 12.01.2012 on the subject cited above and to enclose herewith a revised merit in respect of Executive District Officer (B-19) for information and further necessary action.

Yours faithfully

AB

(Puzal Badshahi)
Director Recruitment
08.02.12

CTE
20/02/12

9/12/12

505.7
8/10/12

1303
12/2/12

Secretary to Government
Elementary and Secondary Education
Peshawar
Date: 10/02/12

ATTESTED

Page 8



KHYBER PAKHTUNKHWA PUBLIC SERVICE COMMISSION

REVISED MERIT OF EXECUTIVE DISTRICT OFFICER (B-19) OF ADVERTISEMENT NO.05/2009.

Merit Order	Name with Father's Name	Domicile/Zone
A. Category-A (Open Merit) Open Market as per rules		
1.	Ghulam Qasim Khan S/O Abdul Majeed Khan	D.I.Khan/4
2.	Abdul Malik S/O Muhammad Mushtaq	D.I.Khan/4
3.	Umar Khan S/O Muhammad Hussain	Tank/4
4.	Shamas Khan S/O Mir Ahmad Khan	Gadoon/3
5.	Abdus Salam S/O Hameed Ullah Jan	D.I.Khan/4
6.	Abdul Basit S/O Qayy Ullah	Peshawar/2
7.	Siraj Muhammad S/O Muhammad Khan	Peshawar/2
8.	Muhammad Uzair Ali S/O Abdul Qayyum	Swabi/2
9.	Nazir Khan S/O Gul Daryo Khan	Karak/4
10.	Sahibzada Hamid Mahmud S/O Mahmud ul Hassan Akhtar	Peshawar/2
B. Category-B (Teaching Cadre)		
1.	Bashir Hussain Shah S/O Taj Hussain Shah	Haripur/5
2.	Muhammad Rafiq S/O Niaz Khanjan	Karak/4
3.	Peroz Hussain Shah S/O Sultan Ali Shah	D.I.Khan/4
4.	Abdur Rashid S/O Ghulam Jaffar	D.I.Khan/4
5.	Muhammad Ibrahim S/O Siraz Jambher	Dit/3
6.	Sultan Mahmood Mian S/O Mumtaz	Swat/3
7.	Roz Wali Khan S/O Jomil Noor	Karak/4
8.	Gohar Ali Khan S/O Muhammad Ali Khan	Peshawar/2
9.	Abdullah S/O Mir Azam	MKD Agy/3
10.	Muhammad Riaz S/O Ghulam Khan	Manshra/5
11.	Jehan Muhammad S/O Sultan Muhammad	Nowshera/2
12.	Muhammad Shoukat S/O Abdul Jalil	Manshra/5
13.	Haziq ur Rehman S/O Sparwar Jan	Karak/4
14.	Jaffar Mansoor Abbas S/O Qasim Rehman Abbas	Abbottabad/5
15.	Zia ud Din S/O Ghulam Niaz ud Din	L.Morwa/4
16.	Alta Ullah Khan S/O Muhammad Nawaz Khan	L.Mirwah/4

CTC
2/2/09

Attested
2/2/09

M. Akhter

ATTESTED

Merit List

Annex ~~11C~~

16

Telephone: 9213563

Khyber-Pakhtunkhwa Public Service
Commission
2 Fort Road Peshawar Cantt:
No. SRI/036824

-14-

Dated: 2 / 8 / 2011



To

The Secretary to Govt. of KPK
Elementary and Secondary Education Deptt:
Peshawar.

Subject:- INTER-SE-MERIT OF EDO (BPS-19) IN E&SE DEPTT.(ADVT.5/09)

Dear Sir,

I am directed to refer to the subject cited above and to forward inter-se-merit of EDO (BPS-19) in Elementary and Secondary Education for your necessary action and record.

Yours Faithfully,

Encl:- (As above)


(ABDUL KAMAL)
Director Recruitment

205


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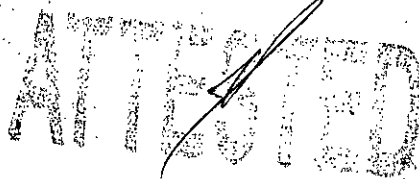
ATTACHED

-15-

Subject: Inter se merit of EDO (BPS-19)

S.No.	Name with Father Name	Domicile	Quota
1.	Ghulam Qasim Khan S/O Abdul Majeed Khan	D.I.Khan/4	Open
2.	Basher Hussain Shah S/O Taj Hussain Shah	Haripur/5	Teaching
3.	Muhammad Rafiq S/O Niaz Khamim	Karak/4	Teaching
4.	Abdul Malik S/O Muhammad Mushtaq	D.I.Khan/4	Open
5.	Umar Khan S/O Muhammad Hassan	Tank/4	Open
6.	Feroz Hussain Shah S/O Sultan Ali Shah	D.I.Khan/4	Teaching
7.	Abdur Rashid S/O Ghulam Jaffar	D.I.Khan/4	Teaching
8.	Muhammad Ibrahim S/O Buzerg Jamher	Dir/3	Teaching
9.	Shamas Khan S/O Mir Ahmed Khan	Gadoon/3	Open
10.	Sultan Mehmood Mian S/O Mumtaz	Swat/3	Teaching
11.	Abdus Salam S/O Hameed Ullah Jan	D.I.Khan/4	Open
12.	Abdul Basit S/O Qavi Ullah	Peshawar/2	Open
13.	Roz Wali Khan S/O Jannat Noor	Karak/4	Teaching
14.	Siraj Muhammad S/O Muhammad Khan	Peshawar/2	Open
15.	Goher Ali Khan S/O Muhammad Ali Khan	Peshawar/2	Teaching
16.	Muhammad Uzair Ali S/O Abdul Qayyum	Swabi/2	Open
17.	Abdullah S/O Mir Azam	MKD Agy/3	Teaching
18.	Nazir Khan S/O Gul Payo Khan	Karak/4	Open
19.	Muhammad Riaz S/O Ghulam Khan	Mansehra/5	Teaching
20.	Jehan Muhammad S/O Sultan Muhammad	Nowshera/2	Teaching
21.	Sahibzada Hamid Mahmud S/O Mahmud ul Islam	Peshawar/2	Open
22.	Muhammad Shaukat S/O Abdul Jalil	Mansehra/5	Teaching
23.	Haziq ur Rehman S/O Sarwar Jan	Karak/4	Teaching
24.	Jaffar Mansoor Abbasi S/O Gauhar Rehman Abbasi	Abbottabad/5	Teaching
25.	Zia ud Din S/O Ghulam Mohiy ud Din	Lakki/4	Teaching
26.	Atta Ullah Khan S/O Muhammad Nawaz Khan	Lakki/4	Teaching


 (ABDUL KAMAL)
 Director Recruitment



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GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Annex-D

-16-

NOTIFICATION

Dated Peshawar the 08.05.2012

NO. SO (S/M) E&SED/4-25/2012/Final Seniority List of MC (BPS -19): In exercise of powers conferred under Sub Section (1) of Section -8 of the North West Frontier Province (now Khyber Pakhtunkhwa) Civil Servant Act, 1973 NO-XVIII of 1973, the Final Seniority List of EDOs/Additional Directors (BPS-19) of Management cadre Elementary & Secondary Education Department as it stood on 22/02/2012, is hereby notified for information of all concerned.

CHIEF SECRETARY
Khyber Pakhtunkhwa

Endst:of even No & Date.
Copy forwarded to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar with the request to circulate the above Seniority list to all concerned.
2. Director Education (FATA) Khyber Pakhtunkhwa. Peshawar
3. Director Curriculum & Teacher Education Khyber Pakhtunkhwa. Abbott Abad.
4. Director PITE, Khyber Pakhtunkhwa. Peshawar.
5. All Executives District Officers, E&SE in Khyber Pakhtunkhwa.
6. PS. to Secretary (E&SE) Deptt. Khyber Pakhtunkhwa. Peshawar .
7. Office order file

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

OFFICE OF THE DIRECTOR ELEMENTARY AND SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR

Endst:No 1501-51 /Etab/ Final Seniority List of MC (BPS -19) Dated Peshawar the 11.05.2012.

Copy of the above is forwarded along with Final Seniority List of MC (BPS -19) for information to the:-

- 1-25 All the Executive District Officers Elementary & Secondary Education Khyber Pakhtunkhwa.
- 26-48 All the Officers Concerned.
49. Section Officer (Schools/Male) Elementary & Secondary Education Department, Government of Khyber Pakhtunkhwa Peshawar.
50. P/S Secretary, Government of Khyber Pakhtunkhwa Elementary & Secondary Education, Department, Peshawar.
51. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.

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

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FINAL SENIORITY LIST OF OFFICERS BPS-19 (EXECUTIVE DISTRICT OFFICERS/ADDITIONAL DIRECTORS),
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT MANAGEMENT CADRE AS IT STOOD ON 22-02-2012.

S.N	NAME OF OFFICERS WITH DESIGNATION	Date of Birth	Domicile	Date of 1st Apptt: in Edu; Deptt;	Date of Apptt/Promotion as EDO /Addl Dir	Method of Recruitment	Remarks
1	Mr: Bashir Hussain Shah Additional Director (P&D) /CPO E&SE Khyber Pakhtunkhwa	10.01.1957	Haripur	01.12.1975	24.02.2011	Direct Selectee against 60% Departmental Qouta	
2	Mr: Muhammad Rafique, Additional Director (Est) E&SE Khyber Pakhtunkhwa	14.02.1958	Karak	06.08.1978	24.02.2011	-do-	
3	Mr: Feroz Hussain Shah, EDO (E&SE) D.I Khan	25.10.1954	D.I Khan	11.11.1975	24.02.2011	-do-	
4	Mr: Abdur Rashid, EDO (E&SE) Bannu	15.05.1957	D.I Khan	24.06.1978	24.02.2011	-do-	
5	Mr: Muhammad Ibrahim, EDO (E&SE) Dir Lower	16.03.1963	Dir Lower	10.02.1988	24.02.2011	-do-	
6	Mr: Sultan Mehmood Mian, EDO (E&SE) Swat	21.12.1955	Swat	20.12.1983	24.02.2011	-do-	
7	Mr: Roz Wali, EDO (E&SE) waiting for posting	10.04.1957	Karak	01.12.1988	24.02.2011	-do-	
8	Gohar Ali Khan EDO (E&SE) Peshawar	01.01.1967	Peshawar	22.04.1990	24.02.2011	-do-	
9	Mr: Abdullah, EDO (E&SE) Shangla	02.09.1956	Malakand	04.03.1984	24.02.2011	-do-	
10	Muhammad Riaz EDO (E&SE) Abbottabad	02.05.1960	Mansehra	24.05.1988	24.02.2011	-do-	
11	Jehan Muhammad EDO (E&SE) Hanqu	04.01.1961	Nowshera	26.10.1986	24.02.2011	-do-	
12	Haziq ur Rahman EDO (E&SE) Karak	06.02.1962	Karak	01.09.1985	24.02.2011	-do-	
13	Jaffar Mansoor Abbasi Working as Prl GHS No.1 Abbottabad	15.09.1968	Abbottabad	11.02.1999	24.02.2011	-do-	
14	Zia ud Din EDO (E&SE) Dir Upper	01.09.1970	Lakki Marwat	01.09.2003	24.02.2011	-do-	
15	Atta Ullah Khan EDO (E&SE) Charsadda	18.03.1960	Lakki Marwat	16.02.1987	24.02.2011	Direct Selectee against 40% Open Market Qouta	
16	Mr: Ghulam Qasim Khan, EDO (E&SE) Tank	10.01.1959	D.I Khan	03.11.1973	24.02.2011	-do-	
17	Mr: Abdul Malik, EDO (E&SE) Lakki Marwat	07.01.1954	D.I Khan	16.02.1977	24.02.2011	-do-	
18	Umar Khan EDO (E&SE) Mansehra	12.02.1962	Tank	01.10.1986	24.02.2011	-do-	
19	Shamas Khan Additional Director (P&D) E&SE Khyber Pakhtunkhwa	13.07.1954	Swabi	25.03.1975	24.02.2011	-do-	
20	Abdul Salam EDO (E&SE) Swabi	01.04.1962	D.I Khan	09.10.1985	24.02.2011	-do-	
21	Siraj Muhammad EDO (E&SE) Chitral	20.04.1960	Peshawar	29.03.1988	24.02.2011	-do-	
22	Nazir Khan EDO (E&SE) Kohat	06.03.1959	Karak	24.10.1989	24.02.2011	-do-	
23	Sahibzada Hamid Mehmood EDO (E&SE) Torgher	06.09.1965	Peshawar	03.12.1989	24.02.2011	-do-	

CHIEF SECRETARY
KHYBER PAKHTUNKHWA

Dated Peshawar the, 08.05.2012

Endst: No. SO (S/M) E&SED/4-25/2012/Final Seniority List of MC (BPS -19):

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

1. Director Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. Director of Education (FATA) Khyber Pakhtunkhwa, Peshawar.
3. Director (PITE) Khyber Pakhtunkhwa, Peshawar.
4. Director Curriculum & Teacher Edu; Khyber Pakhtunkhwa, A/Abad.
- 5-29. All the Executive District Officers (E&SE) in Khyber Pakhtunkhwa.
- 30-52. All officers concerned.
53. P.s to Secretary to Govt; of Khyber Pakhtunkhwa, (E&SE) Peshawar.

SECTION OFFICER (SCHOOLS/MALE)

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