

# INDEX

## KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR


APPEAL NO	INSTITUTION	ORIGINAL INSTITUTION	DECISION	PAGES
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### RUSTAM KHAN VS EDUCATION DEPARTMENT

Sr.No.	Page No.	No. of Pages	Documents
Part-A			
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Total Pages in Part-A	039
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Muharib Compilation

  
29/5/24  
Incharge Judicial Branch



The Judge Service Tribunal  
District Courts Registrar

(3)

Subject:- Application for withdraw the case titled below  
Ravi Singh vs DEO(M) Hanga

Respected Sir,

With great reverence it is submitted that

I have submitted an Complaint agais DEO(M) Hanga

about his un-law full action whic he is taking agais  
me but the matter is solved and now no need to  
further pursue the case.

It is therefore requested your authority

to please withdraw my case as matter is solved

Submitted please



Submitted through

Shahzaib

173016936844-5

Regards

Ravi Singh

0333-5011337

FC Line Promer nager hanga

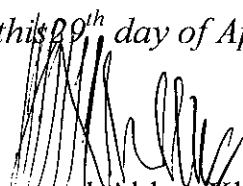
Date:- 29/Apr/2024

①

29.04.2024 01. Mr. Shahzeb, attorney on behalf of the appellant p  
and submitted application for withdrawal of the instant service  
appeal on the ground that the appellant does not want to further  
press the instant service appeal. Application is allowed and the  
instant service appeal is dismissed as withdrawn. Consign.

03. *Pronounced in open court at Peshawar and given under  
my hand and seal of the Tribunal on this 29<sup>th</sup> day of April 2024.*

SCANNED  
KPST  
Peshawar

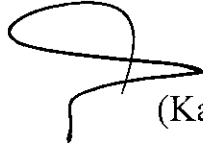
  
(Muhammad Akbar Khan)  
Member (E)

\*kamran\*

2

18<sup>th</sup> Mar. 2024

1. Junior to counsel for the appellant present.
2. He made a request for adjournment as senior counsel was not available today. Adjourned. To come up for preliminary hearing on 29.04.2024 before S.B. P.P given to the junior counsel for appellant.



(Kalim Arshad Khan)  
Chairman


\*Mutazem Shah\*

SCANNED  
KF&T  
Peshawar

4

1<sup>st</sup> Feb. 2024


01. Nemo for the app [redacted] returned. To come up  
for preliminary hearing on 13.02.2024 before the S.B.

  
(Farecha Paul)  
Member(E)

*\*Fazle subhan P.S\**

SCANNED  
KPST  
Peshawar

13.02.2024 Learned counsel for the appellant present and requested for  
adjournment for in order to prepare the brief. Adjourned. To come  
up for preliminary hearing on 18.03.2024 before S.B. P.P given to  
learned counsel for the appellant.

  
(Rashida Bano)  
Member (J)

SCANNED  
KPST  
Peshawar

5

FORM OF ORDER SHEET

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

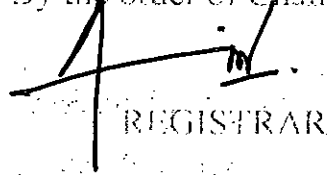
Appeal No. 111/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	11/01/2024	

SCANNED  
KPST  
Peshawar

The appeal of Mr. Ravi Singh resubmitted today by Mr. Ishtiaq Ahmad Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 17-01-24. Parcha Peshi is given to counsel for the appellant.


By the order of Chairman

  
REGISTRAR

17.01.2024

SCANNED  
KPST  
Peshawar

Junior of learned counsel for the appellant present and requested for adjournment on the ground that learned counsel for the appellant is busy in Peshawar High Court, Peshawar. Adjourned. To come up for preliminary hearing on 01.02.2024 before the S.B. Parcha Peshi given to junior of learned counsel for the appellant.

  
(Salah-ud-Din)  
Member (J)

The appeal of Mr. Ravi Singh received today i.e on 21.12.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- The law under which appeal is filed is not mentioned.
- 2- Numbers of respondents are not in sequence.
- 3- Copy of departmental appeal against the impugned transfer order dated 28.05.2022 and order of recovery dated 16.11.2023 is not attached with the appeal which may be placed on it.
- 4- Copy of impugned transfer order 28.05.2022 mentioned in the heading of the appeal is not attached with the appeal be placed on it.

No. 3919 /S.T.

Dt. 22/12/2023.

  
 REGISTRAR  
 SERVICE TRIBUNAL  
 KHYBER PAKHTUNKHWA  
 PESHAWAR.

Mr. Ishtiaq Ahmad Adv.  
High Court Peshawar.

- Before the Honourable Service Tribunal KPK Peshawar.

Removal of objections on the Appeal of  
- Ravi Singh vs The Honourable Secretary of Education KPK Peshawar AND OTHERS

Respectfully Sheweth. It is submitted the objections raised by Honourable Service Tribunal on the above are removed as advised by the Court.

- 1- That the Appeal is filed under Section 4 of the KPK Service Tribunal Act 1974
  - 2- That the Numbers of Respondents are arranged in sequence as advised by Honourable Service Tribunal KPK Peshawar
  - 3- That the Copy of Departmental Appeal by the Appellant to BEO Officer is attached as Annexure G and order of Recovery is attached as Annexure B<sub>1</sub>, B<sub>2</sub> and B<sub>3</sub> which is comprised of 5 Pages
  - 4- That the Copy of impugned order of Appointment/Posting is attached as Annexure A. as front and back page Dated 28-5-2022.
- Therefore it is humbly requested to kindly accept/entertain the Appeal of the Appellant through
- Dated 10-01-2024 / Advocate



**BEFORE THE HON'BLE  
SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,  
PESHAWAR**

**CHECK LIST**

S. No.	Contents	Yes	No
1	This petition has been presented by:	✓	
2	Whether Counsel / Petitioner / Respondent / Deponent have signed the requisite documents?	✓	
3	Whether the enactment under which the case / petition is filed mentioned?		✓
4	Whether the enactment under which the case / petition is filed is correct?	✓	
5	Whether affidavit is appended?	✓	
6	Whether affidavit is duly attested by competent Oath Commissioner?	✓	
7	Whether petitioner/annexure are properly paged?	✓	
8	Whether annexures are certified?	✓	
9	Whether certificate regarding filing any earlier appeal/petition non the subject, furnished?	✓	
10	Whether annexure are legible?	✓	
11	Whether annexure are attested?	✓	
12	Whether Special Power of Attorney Filed?		✓
13	Whether Special Power of Attorney attested?		✓
14	Whether copy of application is delivered to A.G./D.A.G.?		✓
15	Whether Appeal, Revision application is within time?	✓	
16	Whether value for the purpose of court fee and jurisdiction given in the relevant column of the opening sheet is correct?	✓	
17	Whether Power of Attorney of the Counsel engaged is attested and signed by all petitioners/appellants/respondents?	✓	
18	Whether complete spare copy is filed in separate file cover?	✓	
19	Whether numbers of referred cases given/are correct?		✓
20	Whether petition being sent by post?		✓
21	Whether appeal/petition contains cuttings/overwriting?		✓
22	Whether appeal/revision/writ petition is competent?	✓	
23	Whether list of books has been provided at the end of the petition?		✓
24	Whether case related to this Court?	✓	
25	Whether case related to this Bench?	✓	
26	Whether petition drafted by a competent person?	✓	
27	Whether name of Jail in which appellant/petitioner/respondent is confined given?		✓
28	Whether copies of annexures are readable/clear?	✓	
29	Whether Court Fee stamps affixed?		✓
30	Whether Court Fee stamps annexed are sufficient?		✓
31	Whether certified copies of impugned order/decreed sheet before District Judge have been filed?		✓

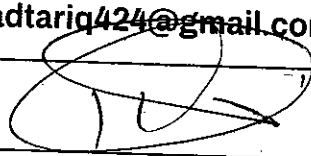
32	Whether in view of Order 43 Rule 3 CPC / Rule 2(3) Chapter-4-1, Vol: V of High Court Rules & Orders, Notice along with copy of appeal/petition and annexures has been sent to respondents?		
33	Whether Judicial Officer whose orders are challenged mentioned at the bottom of the panel of respondents?		✓
34	Whether index filed?		✓
35	Whether index is correct?	✓	
36	Whether copies of comments/reply/rejoinder provided to opposite party?	✓	
37	Whether addresses of parties given are complete?		✓
38	Whether addresses of parties are complete?	✓	
39	Whether list of LR's of petitioner filed?	✓	
40	Whether copy of list of LR's of respondents as filed before Courts below or, if not, a certificate to this effect attached?		✓
41	Whether opening sheet filed?		✓
42	Whether opening sheet is correct / complete?	✓	
43	Whether approved file cover used?>	✓	
44	Whether separate application filed for each prayer?	✓	
45	Whether separate request has been made for interim relief in writ petition?	✓	
46	Whether security of Rs. 10,000/- deposited with review petition?		✓
47	Whether review petition filed and certified by the Advocate who had argued the case resulting into order review of which is sought?		✓
48	Whether purpose of the document filed explained?		
49	Whether respondents sued by name in the CoC?	✓	✓

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name: Syed Hammad Tariq

Cell No: 0333-9050789

E-mail Hamadtariq424@gmail.com

Signature 

Dated: 19<sup>th</sup> December, 2023

(9)

**BEFORE HONORABLE JUDGE  
SERVICE TRIBUNAL KPK, PESHAWAR**

**SCANNED  
KPST  
Peshawar**

Ravi Singh S/o Karishan Lal Naib Qasid Govt High School Bilyamina tehsil and District Hangu

*Appeal no. 111/2024*

(Appellant/Plaintiff)

**VERSUS**

1. The Secretary Education on Govt of KPK Thorough its office at Civil Secretariat Peshawar & others.

(Respondents)

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3	Refunding Overpayment letter No.9013 dated 22-12-2023 (B1) & letter No.936-38 dated 16-11-2023 (B2) (B3) letter dated 15-11-2023	B	7-9
4	Pay release order 06-06-2023	C	10
5	Provincial Ombudsman Letter 27-03-2023	D	11-12
6	Departmental Application / Appeal to DEO Hangu (Male) 20-09-2023	E	13-15
7	Application of the applicant & letter of DC Hangu 17-06-2022	F	16-18
8	Letter of principal 13-10-2023	G	19-20
9	Complaint / Application Human Rights Cell Letters 13-11-2023	H	21-22
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Through

Ishtiaq Ahmad

Syed Hammad Tariq

Mohsin Khan

Irfan Ali

(Advocates High Court Peshawar)

Dated : 19-12-2023

**BEFOR THE HONORABLE JUDGE**  
**SERVICE TRIBUNAL KPK, PESHAWAR**

1 Ravi Singh S/o Karishan Lal Naib Qasid Govt High School Bilyamina tehsil and District Hangu

(Appellant/Plaintiff)

**VERSUS**

1. The Secretary Education on Govt of KPK Thorough its office at Civil Secretariat Peshawar.
2. The Director District Elementary and Education Department Govt of KPK Peshawar.
3. The District Education Office (Male) District Hangu.
4. The Provincial Ombudsman Khyber Pakhtunkhwa Peshawar.
5. The Deputy Commissioner Hangu.
6. The District Accounts Officer Hangu.
7. The Principal Govt High School Bilyamina District Hangu.
8. The Director Human rights cell thorough its office at Peshawar High court.

(Respondents)

*IMPUGNED*

**APPEAL AGAINST THE POSITING / TRANSFER ORDER UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974. ENDS 1734-44 CLASS IV APPIT 2021, DATED HANGU 28-05-22 PASSED BY RESPONDENT NO. 3 TO POST /TRANSFER THE APPELLANT TO GOVT HIGH BALYAMINA INSTEAD OF HANGU DUE TO PERSONAL GRUDGE OF THE RESPONDENT NO.3 WITH THE APPELLANT THE SAME ORDER IS LIABLE TO BE CANCELLED AS THE APPELLANT IS APPOINTED ON MINORITY SEAT, FURTHER DUE SECTARIAN ISSUES THE APPELLANT IS UNABLE TO PERTAIN HIS DUTY IN THE SAID SCHOOL SECONDARY THE RESPONDENT NO.3 ISSUED LEETER NO.936-38 DATED 16-11-2023 FOR REFUNDING OVER PAYMENT SINCE 06-06-2022 TO 05-06-2023 WHICH IS WRONG AND WITHOUT LEGAL AUTHORITY AND THE SAME IS LAIBLE TO BE SET ASIDE. THE RESPONDENT NO.3 IS JUST TO PENALIZE THE APPELLANT INSTEAD OF SOLVING HIS GRIEVANCES. IT IS TO MENTION HERE THAT THE APPELLANT HAS TAKEN CHARGE ON 06-06-2022 LEGALLY AND AS PER OMBUDSMAN SECRETARIAT ISSUE GUIDELINES LETTER DATED 27-03-2023.**

*21/12/23*

*11/01/24*

*19029*

*21-12-2023*

11

2

Respectfully Sheweth:-

It is humbly submit as under:

1. That the addresses of the parties for the purpose of service by learned court have been correctly given above.
2. That the appellant and his family are the law abiding citizen of Pakistan and permanent resident of Hangu.
3. That the appellant was appointed / transferred against the post of "Naib Qasid" on 28-05-2002 on minority seat at Government High School Balyamina which is situated at remote area. (Appellant's appointment, transfer orders are placed on file).
4. That the appellant has already assumed his charge on 06-06-2022 and his pay was released by the respondent no.3 vide letter no- 936-38 dated 15-11-2023 which is self-explanatory.
5. That through this instant appeal the appellant humbly seeks the indulgence of this Hon'ble court for setting aside posting / transfer order dated 28-05-2022 whereby the appellant was posted / transferred at G.H.S Bilyamina because the appellant is unable to perform his duty efficiently, diligently due to serious ethics issues which needs to be resolved by the respondent no.3 without his personal ego.
6. That the deduction of salary w.e.f 06-06-2022 to 05-06-2023 is also illegal and without any justification on which needs to be reviewed by the respondent no.3, he has put the appellant in mental agony as well his family. it is pertinent to mention here that the respondent no.3 is negating his own office order no. 1762-63 dated 16/06/2023 addressed to the principal Govt High School Bilyamina Hangu and copy to Distt accountant officer Hangu (copy of the order dated 16-06-2-23 is attached herewith).
7. That the order of posting / transfer passed by respondent no.3 against appellant to bilyamina is not is not sustainable in the eyes of law as well violation of the constitution of Islamic Republic of Pakistan, which is suffered from surmises and conjectures Hence liable to be set aside inter alia on the following grounds.

**GROUNDS:**

1. That the impugned order dated 22-05-2022 passed by respondent no.3 is a sheer violation laid down by Apex court in transfer matters. At the time of transferring a public official, the superior must follow guide lines and principles envisaged in the precedents. Although transfer is prerogative of the employer, however the same is liable to be called for if exercise in arbitrarily.
2. That the appellant was posted / transfer to unsafe place i.e G.H.S bilyamina instead of Hangu just to penalize for personal ego of respondent no.3 and put the appellant in fear, and choase and the appellant has not been allowed to perform his duty peacefully.
3. That the appellant submitted his representation before respondent no.4 for cancellation / with drawl of his transfer order. The respondent no.4 sought comments from the parties. The hearing was conducted by the respondent no.4 in the presence of respondent no.2, 3 and 7. The respondent no.4 issued his findings that the appellant was appointed against the vacant post of class IV under minority quota at G.H.S Bilyamina but due sectarian issue he could not join his duty and it is the responsibility of DEO (Male) Hangu to adjust the appellant at any other station but no action has been taken by the respondent no.3 up till now. **(Copy of the provincial ombudsman judgement finding is placed on file).**
4. That the appellant also made representation to respondent no.2 to transfer him to Hangu instead of bilyamina the respondent no.2 directed the respondent no.3 to solve the grievances of appellant but in vain **(Copy of the application and letter is attached herewith).**
5. The appellant submitted his application to respondent no.5 for redressal of his transfer case, who accepted the stance of appellant and directed the respondent no.3 to resolve his transfer issue but the respondent no.3 gave a deaf ear to the directives of Deputy Commissioner Hangu (respondent no.5). **(Application of the appellant and letter of D.C Hangu is placed on file).**
6. That the appellant has a clear and unblemished and good service record. His performance has been acknowledge by the principal G.H.S Bilyamina Distt Hangu (Respondent No.7). **(Letter of principal No.916-17 dated 13-10-2023 is placed on file).**
7. That the appellant / head made representation to respondent no.8 but no fruit full result has been achieved till date copy of letter of human rights is attached)
8. That if the appeal is not accepted, irreparable loss will be suffered by the appellant.
9. That there are two other stations that the applicant should be adjusted as per district education officer letter. **(Letter dated 11-12-2023 is attached).**
10. That the appellant has no other alternative effective and speedy remedy for the redressal of his grievance and can only invoke the jurisdiction of this Honorable court.
11. That the appellant humbly seeks permission of this Honorable tribunal to raise additional grounds at the stage of arguments.

**PRAYER**

In aforementioned circumstances it is humbly prayed the instant appeal may kindly be accepted and order dated 28-05-2022 passed by responded no.3 / Distt Education Officer Hangu (Male) whereby, the appellant was posted / transferred to Govt high school bilyamina may graciously be set aside, further the respondent no.3 may be restrained from making deduction from the salary w.e.f 06-06-2022 to 05-06-2023 of the appellant. Any other relief which this Honorable court deems fit and appropriate may kindly also be granted.

Appellant *Samiul*

Through *Asim Ahmad*

Ishtiaq Ahmad  
Syed Hammad Tariq  
Mohsin Khan  
Irfan Ali (Advocates High Court Peshawar)

**CERTIFICATE**

It is certified that upon instructions of my client it is the 1<sup>st</sup> appeal filed before this Honorable tribunal in the instant matters.

19-12-2023

ISHTIAQ AHMAD  
Advocate  
High Court Peshawar

*Asim Ahmad*  
Advocate  
High Court Peshawar  
ISHTIAQ AHMAD  
Advocate  
High Court Peshawar

S

**BEFORE THE HONORABLE SERVICE TRIBUNAL KPK**  
**PESHAWAR**

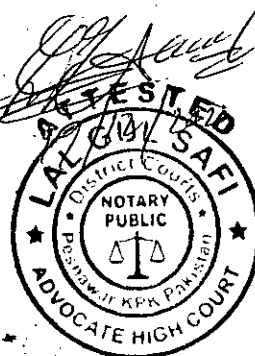
**AFFIDAVIT**

I , Ravi Sing S/o Karishan Lal naib qasid govt high school Bilyamina tehsil and district Hangu do hereby solemnly affirm and declare on Oath that the contents of my this instant appeal are true and correct to the best of my knowledge and belief and nothing has been concealed for the honorable service tribunal therein.

Deponent: Ravi Singh

Ravi Sing

19-12-2023







15

6

**Office Of The District Education Officer (Male)**  
**District Hangu**

**APPOINTMENT ORDER:**

Consequent upon the Recommendation of the Departmental Selection Committee, the following (Male) Candidates are hereby appointed as Class-IV in BPS-03 under 100% Deceased/Medical Board out son, 5% Minority Quota and 25% Retired Son Quota, in the basic pay scale @Rs.(9610-390-21310) plus usual allowances as admissible under the rules from the date of taking over charge on regular basis against the Vacant/Newly Created Posts in the schools/office as mentioned against their names with immediate effect in the interest of public service subject to the terms & conditions as laid down below;

**100 % DECEASED /MEDICAL BOARD OUT SON.**

S#	Name & Father's Name	CNIC	Post	Place Of Posting	Remarks
1.	Abdul Hadi s/o Abdul Saeed	14101-0129102-9	Chowkidar	GPS Koto Menz Naryab Hangu	A.V.P under 100% Deceased/ M.B son

**5 % MINORITY CANDIDATES**

S#	Name & Father's Name	CNIC	Post	Place Of Posting	Remarks
1	Ravi Singh s/o Karishan Lal	14101-5933430-7	N/Qasid	GHSS Bilyamina	A.V.P under 5% Minority Quota
2	Sandip kumar s/o Kishwar Lal	14101-8531996-7	Sweeper	GHS Dorari Banda	A.V.P under 5% Minority Quota

**25 % RETIRED SON CANDIDATES**

S#	Name & Father's Name	CNIC	Post	Place Of Posting	Remarks
1	Siraj Noor s/o Sultan Asghar	14101-6560816-3	Lab Attd:	GHSS Bilyamina	A.V.P Under 25% Rtd Son Quota
2	Muhammad Qasim s/o Shah Wali Khan	141019892473-7	Lab Attd	GHSS Doaba	A.V.P Under 25% Rtd Son Quota
3	Abdul Wahab s/o Asal Zareen	14101-5639015-5	Lab Attd	GHSS Togh Sarai	A.V.P Under 25% Rtd Son Quota
4	Tanveer Elahi s/o Zahoor Elahi	14101-1810410-1	Sweeper	GHSS Togh Sarai	A.V.P Under 25% Rtd Son Quota
5	Muhammad Ibrahim s/o Lal Badshah	14101-4913859-1	Chowkidar	GPS No.4 Hangu	A.V.P Under 25% Rtd Son Quota
6	Muhammad Nawaz s/o Maweez Khan	21604-0789458-7	Chowkidar	GPS Zanki Banda	A.V.P Under 25% Rtd Son Quota
7	Abdul Nasir s/o Islam Jan	14102-0391228-7	Chowkidar	GPS Farid Abad	A.V.P Under 25% Rtd Son Quota

19-12-2023

P.T.O

*[Handwritten Signature]*

(16)

**Terms & Conditions:**

1. No TA/DA is allowed.
2. Charge report should be submitted to all concerned in triplicate.
3. They (he) will neither be less than 18 years nor more than 40 years.
4. They should join their posts within 15 days of the issuance of this order. In case of non-joining the post, their (his) appointment Order will be deemed as cancelled.
5. They (he) will remain on probation for Period for two years under rules 15(1) NWFP Civil Servants Appointment Rules 1989 extendable for further two years.
6. Before Assumption of charge, they (he) will have to provide Medical Fitness Certificate from Medical Superintendent DHQ Hospital Hangu.
7. In case of resignation, the official will have to give application one month prior to the competent authority. In case he (they) failed, their (his) one month pay will be forfeited to the Govt: treasury on proper challan.
8. They (he) will not claim their (his) Rights/Privileges, through appeal /petitions if they (he) terminated because of any mistake / over sight committed which is pointed out at later stages.
9. They (he) will be governed by such rules and regulation, as the government prescribed from time to time.

**(MUHAMMAD SHERAZ)**  
**District Education Officer (Male)**  
**District Hangu.**

**Endst: No.1734-44 Class-IV Apptt:2021, Dated Hangu the:28/05/2022**

Copy forwarded for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. PS to Secretary to Govt; (E & SE) Deptt: Khyber Pakhtunkhwa Peshawar.
3. PA to Director (E & SE): Khyber Pakhtunkhwa Peshawar.
4. Deputy Commissioner Hangu.
5. District Account Officer Hangu
6. Principals /Head Masters /SDEOs & Head Teachers Concerned.
7. DEMIS Cell Local Office.
8. Budget & Account Officer Local Office.
9. District Monitoring Officer, Station Road Hangu.
10. Candidates Concerned.
11. Copy.

**Dy: District Education Officer (Male)**  
**District Hangu**

Pg A/7 (17)

**OFFICE OF THE PRINCIPAL GHSS BILYAMINA HANGU**

NO 936-38

Dated. 16 / 11 / 2023

To

Mr. Ravi Singh  
Naib Qasid GHSS Bilyamina Hangu

Subject:-

**REFUNDING OVERPAYMENT SINCE 06-06-2022 TO 05-06-2023**

Memo:

As per direction provincial Ombudsman Khyber Pakhtun Khwa .  
You Mr. Ravi Sing S/O Krishna Lal has taken over charge as Naib Qasid Dated 06 -06-2022 and joined school duty on 06-06-2023 .Pay Release order issued by worthy DEO (M) Hangu Vide No 1662-63 dated.16-06-2023 in your case you have drawn your pay w.e.f 06-06-2022 .Now the worthy DE (M) Hangu directed me vide letter No 4088 dated 15-11-2023 referencing . Honorable Supreme Court judgment " No Duty No Pay" the payment made to Mr Ravi Singh since 06-06-2022 to 05-06-2023 must be recovered .So you Mr Ravi Singh are directed to refund the payment made to you since 06-06-2022 to 05-06-2023 with immediate effect .

ATTESTED

High Court Peshawar

Principal  
GHSS Bilyamina Hangu

Copy forwarded to.

1. The District Education Officer (M) Hangu.
2. The Officer Conerned.
3. Officer Copy.

19-12-2023



(18)

(7B)

**OFFICE OF THE DISTRICT EDUCATION OFFICER (M)**  
**DISTRICT HANGU (0925-621083) deohangu@gmail.com**



No 9031

Dated: 22/12/2023

To

The Principal,  
GHSS Bilyamina, Hangu.

Subject: **Recover Over Payment in R/o Mr. Ravi Singh (N/Q)**  
**GHSS Bilyamina, Hangu**

Memo

Reference this office Endst: No. 7089-92 dated 12/12/2023 (copy attached) on the subject cited above and to state, you were directed that recover overpayment from the subject cited official and submit source II verified copy to this office, but vain.

Therefore, you are once again directed to recover over payment from the said official and submit verified source II copy with 3 days positively. Otherwise disciplinary action will be initiated against you under the E&D Rule 2011.

DISTRICT EDUCATION OFFICER (M)  
DISTRICT HANGU

Endst: Even No. & Dated

Copy to the:-

1. PA to Secretary, Ele: & Secondary Edu: KP, Peshawar.
2. PA to Director, Ele: & Secondary Edu: KP, Peshawar.
3. Deputy Commissioner Hangu.
4. District Account Officer Hangu.
5. Office Copy

DISTRICT EDUCATION OFFICER (M)  
DISTRICT HANGU



(19) 76

**OFFICE OF THE DISTRICT EDUCATION OFFICER  
(MALE) DISTRICT HANGU**

No. 41024

Dated 15-11-2023

To

The Principal,  
GHSS Bilyamina,  
District Hangu.

Subject:  
Memo

**RAVI SINGH (N/OASID) STATEMENT /REPORT**

Reference to this office letter No.3578 Dated 28/9/2023 on the subject cited above and to state that on the subject your reply is not satisfied. You are, once again, directed to recover the over payment in r/o Mr. Ravi Sing (N/Q) that you have made, because the pay has been released w.e.f the date of taking over charge. The Charge has been taken over on 06/06/2023 as the undersigned has joined this office September 2022 and was not in June 2022. How you have handed over charge on 06/06/2022 and below instead of 06/06/2023 has been written. As per Supreme Court Judgment "No duty No pay". He has not served till 05/06/2023. So immediately recover the salaries paid w.e.f 06/06/2022 to 06/06/2023, failing which strict action will be taken against you and high ups will also be informed.

District Education Officer  
(Male) Hangu

Endst No & Date Even:

Copy to the:

1. Secretary Ele:&Sec: Education Khyber Pakhtunkhwa Peshawar.
2. Director Ele:&Sec: Education Khyber Pakhtunkhwa Peshawar.
3. Deputy Commissioner Hangu.
4. District Account Office Hangu.
5. Office File.
- 6.

District Education Officer  
(Male) Hangu

(20) P-9 (8)

To,

The Principal,  
GHSS Bilyamina,  
District Hangu.

Subject: **STATEMENT ON REFUNDING OVERPAYMENT SINCE 06-06-2022 TO 05-06-2023**

Sir,

With reference to your **letter No 936-38 Dated: 16-11-2023** I Ravi Sing S/O Krishan Lal was appointing on the post of Naib Qasid through DEO(M) Hangu order on dated 28-05-2022 and at that time due to DEO(M) Hangu negligence I was not able to take my charge because the DEO(M) Hangu was not interested to give me the charge on my post, despite all this I still visited different authorities office and submit my application/Appeals for taking my charge on Naib Qasid Post and at the end when I did not get any positive response from any one I submit my appeal in front of **Ombudsman Secretariat** and they put-up my case and start working on it at the end they issue order in my favor and issue directions to DEO(M) Hangu to give me charge and transfer me from that school to any other School where vacant post is available within Hangu city but DEO(M) Hangu again fail to do as directed.

It is pertinent to mention that I have taken the charge on that date 06-06-2022 according to law and Ombudsman Secretariat issue guidelines (Copy Attached). and your letter Endrst: No 866-72 Dated 06/06/2023 you also verified it by your official Signature and stamp on my charge assumption report (Copy Attached). The copies of charge reports ere forwarded to all concerned on due time including DEO (M) Hangu.

If there was any issue regarding Charge assumption date, why did he not object at that time.

Secondly after my Charge Assumption my Pay Release order was issued by DEO(M)Hangu(Copy Attached). he sign and stamp my Pay Releasing order at that time they also not raise that issue if there was anything happening against the Honorable Supreme Court Judgment "No Duty No Pay" then it was the duty of

RECEIVED  
[Signature]

(21)

P. 8 - 29

DEO(M)Hangu to Object on my charge assumption Report and ask the Principal to re-take Assumption report but rather doing that DEO(M)Hangu Sign and Stamp my Pay Release Order(Copy Attached)..

The final decision was always taken by the authority DEO(M)Hangu he issued my pay Releasing order I submitted relevant documents in front of Ombudsman Secretariat according to their guidelines and did not done anything against the law.

DEO(M)Hangu is not dealing this case professionally rather maltreatment is continues competing by the officer. I am going to submit an Appeal in front of Khyber Pakhtunkhwa Service Tribunal Court. Against him regarding his maltreatment action against me.

Regards  
30/11/23

Ravi Sign S/O Krishan Lal  
14101-593343-7

Dated: 30/11/2023

Copy Forwarded

- Khyber Pakhtunkhwa Service Tribunal Court.
- Human Right Cell Peshawar High Court. Complaint No (29044).
- ✓ Provincial Ombudsman Secretariat Khyber Pakhtunkhwa. (Complaint No:1497/10/2022)
- Secretary Eel: &Sec: Education Khyber Pakhtunkhwa.
- Director Elementary Secondary Education Khyber Pakhtunkhwa.
- Deputy Commissioner District Hangu.
- DEO(M) Hnagu.

19-12-2023

ATTESTED

M. TIAQ AHMAD  
Advocate  
High Court Peshawar

22

P.8 - 8 - 10

**OFFICE OF THE DISTRICT EDUCATION OFFICE  
MALE HANGU**

**PAY RELEASE ORDER**

Received verified Domicile in r/o Ravi Singh N/Qasid GHSS Bilyamina from Deputy Commissioner Hangu vide Endst; No. 5071/Domicile/DC(H) Dated: 15-06-2023.

The pay of Ravi Singh is hereby released from their taking over charge.

*[Signature]*  
District Education Officer  
Male Hangu  
16/06/2023

Endst; No. 1762-63 Dated: 16 / 6 / 2023  
Copy to the

- 1. District Account Officer Hangu
- 2. Principal GHSS Bilyamina Hangu.
- 3. Office Copy

*[Signature]*  
District Education Officer  
Male Hangu  
16/06/2023  
19-02-2023

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ATTESTED

*[Signature]*  
Advocate  
High Court Feshawar





**OMBUDSMAN (محاسب) SECRETARIAT,  
GOVERNMENT OF KHYBER PAKHTUNKHWA**

CLOSURE FINDINGS	
1	COMPLAINT NO. P.O/Complaint No. 1497/10/2022
2	NAME & ADDRESS OF THE COMPLAINANT Mr. Ravi Singh s/o Krishan Lal, r/o Pream Nagar FC Line District Hangu.
3	NAME OF THE AGENCY COMPLAINED AGAINST 1. Director, Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar. 2. District Education Officer (Male), Hangu. 3. Principal, Govt: High School Bilyamina, Hangu.
4	NAME OF THE INVESTIGATION OFFICER (SAMRAH IQBAL) INVESTIGATION OFFICER-III
	SUBJECT OF COMPLAINT Violation of merit.
6	DATE OF REGISTRATION 25/10/2022
7	DATE OF FINDINGS 21/03/2023.

**THE COMPLAINT**

Mr. Ravi Singh r/o District Hangu instituted the instant complaint stating that he is appointed against the vacant post of Naib Qasid under minority quota in Government High School Bilyamina Hangu vide appointment order No. 1734-44 dated 28/05/2022 However, the principal concerned is not allowing him for taking over charge of the post. He stated that he approached the District Education Officer (Male) Hangu and Deputy Commissioner Hangu also for redressal of his grievance but in vain. He requested this Forum for redressal of his grievance.

**REPLY OF THE AGENCY**

Notices under Section 10(4) of the Khyber Pakhtunkhwa Provincial Ombudsman Act, 2010 were issued to Director Elementary & Secondary Education Khyber Pakhtunkhwa, District Education Officer (Male) Hangu and Principal Government High School Bilyamina Hangu to meet the allegations contained in the complaint and submit reply including rebuttal, if any. In response District Education Officer (Male) Hangu informed that Mr. Ravi Sing was appointed as Naib Qasid, at Government High School Bilyamina Hangu vide office order No. 1734-44 dated 28/05/2022. But he failed to join the duty.

**REJOINDER**

Reply of the Agency was shared with the complainant for his feedback/ rejoinder. In response, he rejected the stance of the Agency and reiterated his earlier stance.

**HEARING**

Due to divergent stance of both the parties, the case was fixed for hearing on 26/01/2023. Mr. Asmatullah Khan Principal GHSS Bilyamina Hangu and Muhammad Nawaz Khan ADO (Litigation), DEO (M) Hangu attended the hearing as representative of the Agency. During hearing Principal of Government High School Bilyamina stated that due to sectarian issues, the complainant was unable to attend the school for joining duty. The Principal requested that the DEO (M) Hangu may be requested to resolve the issue. During hearing, the representative of

*(Handwritten signatures and marks)*



(24) P.8 = 12

**OMBUDSMAN (مستب) SECRETARIAT,  
GOVERNMENT OF KHYBER PAKHTUNKHWA**

DEO (M) Hangu was directed to adjust the complaint against any other class-IV post, where he may not suffer such difficulties, being related to minority.

**FINDINGS**

Perusal of record shows that complainant was appointed against the vacant post of Class-IV under minority quota at GHSS Hangu, but due to sectarian issue, he could not join his duty. It is the responsibility of DEO (M) Hangu to adjust the complainant on any other vacancy subject to his eligibility for the post. Therefore, it is recommended that DEO (M) Hangu may adjust him at any other station, as per rules, but not later than 45 days of the receipt of these Findings.

*Note: Defiance/ non-compliance shall warrant disciplinary proceedings against the Principal Officer of the Agency in terms of Section 11 of the Khyber Pakhtunkhwa Provincial Ombudsman Act, 2010, whereby, the Government will take necessary action for ensuring good governance.*

A. A.  
Syed Jamalud Din Shah  
PROVINCIAL OMBUDSMAN

27.3.2023

19-12-2023

*[Handwritten signature]*

Principal Officer

D  
[Faint stamp]



25

P-8 43

**Deputy Commissioner, Hangu**

Tel: 0925 / 621175 - 621466 - 622366 - 623968

Fax: 0925/620050, Email: dc.hangu@gmail.com

No. 2394 /AG-II/DC(H)

Dated: 17/06/2022

To

The District Education Officer (Male),  
Hangu.

Subject: **APPLICATION.**

Memo:

Kindly refer to the subject cited above.

It is to inform that Ravi Singh s/o Krishan r/o Prem Nagar, Hangu was appointed by your office as Naib Qasid in Government High School, Bilyamina on Minority Quota (copy enclosed) but the locals are creating problems and hurdles for him to take/submit charge on the account that this seat belongs to locals.

Therefore, it is directed that the applicant may be adjusted in some nearby school, so that justice may be served, please.

  
Deputy Commissioner  
Hangu

**Endst: Even No. & Date.**

Copy forwarded to:

Ravi Singh s/o Krishan r/o Prem Nagar, Hangu w/r to above.

  
Deputy Commissioner  
Hangu

19-12-2023

0/4

## بخدمت جناب ڈپٹی کمشنر صاحب ضلع ہنگو

درخواست بمراد غور

جناب عالی!

گزارش یہ ہے کہ سائل نو گزشتہ بھرتی میں سلیکٹ ہو کر محکمہ ایجوکیشن میں بطور نائب قاصد اقلیتی کوٹہ میں سے ملازمت پر

مامور کیا ہے۔

۲۔ یہ کہ مطلقہ حکام نے سائل کو بلیا مینہ ہائی سکول مردانہ میں نائب قاصد تعیناتی کا حکم صادر کیا۔ اور من سائل نے حسب احکم ارا نیول کرنے کو کہا لیکن اہلیانہ بلیا مینہ نے سائل کو کہا کہ مہربانی کر کے یہاں ارا نیول نہ کریں۔ کیونکہ کے یہاں ہمارے علاقے کے بندے کو نائب قاصد کا پوسٹ نہیں ملا ہے یہ پہلے ہمارا حق ہے۔ جس کی وجہ سے مجھے چارج نہ مل سکا۔

۳۔ یہ کہ من سائل کا تعلق اقلیتی برادری سے ہے۔ بدین وجہ اہلیان بلیا مینہ چارج حاصل کرنے سے ہائل ہوئے ہے۔ اس سلسلے میں من سائل نے جناب ڈسٹرکٹ ایجوکیشن کو فریاد کیا انہوں نے بے بسی ظاہر کی من سائل حصول انصاف کا خواہاں ہے۔

۴۔ یہ کہ سائل کو ملازمت کرنا ہے اگر اہلیان بلیا مینہ من سائل کی اپا گمنٹ پر ناخوش ہے تو میری اپا گمنٹ دیگر کسی بھی سکول میں کرائی

جانے کا حکم صادر فرمایا جائے۔ تحریر 13-06-2022

روی سنگھ ولد کرشن سنگھ پرمیم نگر ضلع ہنگو

14101-5933430-7

0333-5011337

۱۹-۱۲-۲۰۲۲

Copy to:

۱۔ سیکٹری ایجوکیشن خیبر پختونخواہ پشاور۔

۲۔ منسٹر اقلیتی امور وزیر زادہ صاحب پشاور

۳۔ ایم پی اے سردار رنجیت سنگھ پشاور

۴۔ ایم پی اے شاہ فیصل ضلع ہنگو

(27)

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بخدمت جناب سیکٹری صوبائی متحصب صاحب حیات آباد پشاور  
درخواست ہمداد: مناسب کاروائی بدین امر کہ سائل گورنمنٹ ہائی سکول بلیامینہ میں بطور نائب قاصد بحوالہ  
نمبر 44-1734 کلاس فور 2021 بھرتی ہو کر سکول منخور میں ڈیوٹی کرنے نہیں دیتے۔ اس لئے درخواست ہذا کی  
ضرورت لاحق ہوئی ہے۔

جناب عالی!

سائل حسب ذیل عرض کرتا ہے۔

۱۔ یہ کہ سائل ایف سی لائن پریم نگر ہنگو کا مستقل باشندہ ہے۔

۲۔ یہ کہ سائل اقلیتی کوٹہ پر گورنمنٹ ہائی سکول بلیامینہ تحصیل وٹڑا ہنگو میں بطور نائب قاصد بھرتی ہوا۔ نقل حکم لٹ ہے۔

۳۔ یہ کہ سائل حسب حکم گورنمنٹ ہائی سکول بلیامینہ تحصیل وٹڑا ہنگو میں بھرتی کیا گیا۔ تو پرنسپل صاحب سکول مذکورہ نے سائل کو ڈیوٹی نہ دی۔ انکار کیا۔

۴۔ یہ کہ سائل ڈسٹرکٹ ایجوکیشن آفیسر (مردانہ) ضلع ہنگو کے پاس گیا اور جملہ حالات واقعات سے آگاہ کیا۔ جنہوں نے پرنسپل صاحب کو فون کیا لیکن اس کے باوجود سائل کو  
چارغ نہ ملا۔

۵۔ یہ کہ سائل نے ڈپٹی کمشنر صاحب کو فریاد کی۔ اور ہدایت کی کہ اہل کو کسی بھی سکول میں ایڈجسٹ کرنے اس کے باوجود بھی کچھ نہ ہوا اس لئے درخواست ہذا کی ضرورت لاحق  
ہوئی۔

۶۔ یہ کہ سائل پاکستانی ہے۔ اقلیتی فرقہ سے تعین رکھتا ہے۔ جس سے پاکستانی سائل کو جملہ حقوق حاصل ہے۔

اندریں حالات استدعا ہے کہ سائل کے درخواست پر غور کیا جائے۔ سائل کو کسی بھی جگہ نائب قاصد تعینات کیا جائے۔ سائل ایک غریب بال بچے دار ہے سائل کو ملازمت کا پورا  
حق حاصل ہے۔ تحریر 29-09-2022

روی سنگھ ولد کرشن لعل سنگھ پریم نگر ایف سی لائن ضلع ہنگو

شناختی کارڈ نمبر: 7-0333430-14101

موبائل نمبر: 0333-5011337, 03013012232

Copy to:

۱۔ چیف انسپکٹر خیر پختونخواہ پشاور

۲۔ ڈپٹی ایگزیکٹو انسپکٹر خیر پختونخواہ پشاور

۳۔ سیکٹری ایجوکیشن خیر پختونخواہ پشاور

۴۔ ڈپٹی ایگزیکٹو انسپکٹر خیر پختونخواہ پشاور

۵۔ ڈپٹی ایگزیکٹو انسپکٹر خیر پختونخواہ پشاور

۶۔ ایم پی اے سردار رحمت گنگھ خیر پختونخواہ پشاور

۷۔ ایم پی اے شاہ فیصل خان ہنگو

۸۔ ڈائریکٹر ایجوکیشن خیر پختونخواہ پشاور

۹۔ کمشنر کوہاٹ

۱۰۔ ڈپٹی کمشنر ضلع ہنگو

۱۱۔ ایجوکیشن آفیسر ضلع ہنگو

19-12-2023

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**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
CIVIL SECRETARIAT PESHAWAR  
(Phone No.091-9223587)

No.SO (Primary-M)/E&SED/2-1/Transfer-Posting/Mr. Ravi Singh/Naib Qasid/Hangu/2023  
Peshawar Dated 20<sup>th</sup> September, 2023


To

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

**Subject: - REQUEST FOR TRANSFER ON HUMANTARIAN GROUNDS.**


I am directed to refer to the subject noted above and to enclose herewith a copy of application which is self-explanatory received from Mr. Ravi Singh Naib Qasid (BS-03) GHS Bilmina Hangu regarding life threatening issues in the current school area and wants to transfer in city area in Hangu for favourable consideration and necessary action, please.

Encl: AA

  
(MUHAMMAD ISHAQ)  
SECTION OFFICER (PRIMARY MALE)

Copy forwarded to the:

1. District Education Officer (Male), Hangu.
2. PS to Secretary, E&SE Department Khyber Pakhtunkhwa.

  
SECTION OFFICER (PRIMARY MALE)  
20/9/23  
19-12-2023

**ATTESTED**

ISHTIAQ  
Advocate  
High Court Peshawar

بھتور صاحب ڈائریکٹر ایجوکیشن ایڈ سیکنڈری ایجوکیشن ڈپارٹمنٹ خیبر پختونخواہ پشاور

عنوان: درخواست برائے تبادلہ گورنمنٹ ہائی سیکنڈری سکول بلیا پینہ ہنگو سے گورنمنٹ ہائی سکول جوڑا رہا کسی بھی شہری سکول میں  
 مودبانہ گزارش ہے کہ من سائل روٹی سنگھ نائب قاصد گورنمنٹ ہائی سیکنڈری سکول بلیا پینہ ہنگو میں مورخہ: 28-05-2022 کو اقلیتی کوٹہ  
 پر بھرتی ہوا چونکہ میں اقلیتی برادری سکھ مذہب سے تعلق رکھتا ہوں مودودہ حالات میں اقلیتی برادری کو دیہاتی علاقوں میں خدمات سرانجام  
 دینے میں ہر قسم کے خطرات لاحق ہوتے ہیں سکول ہذا دیہاتی علاقے میں واقع ہے ہاں سیکورٹری کا کوئی خاص انتظام نہیں ہے من سائل  
 نے بار بار ڈی ای او صاحب کو نوٹس میں لایا ہے کہ میں اقلیتی برادری سے تعلق رکھتا ہوں جو کہ سکول ہذا دیہاتی علاقے میں واقع ہے جہاں  
 مجھے شدید قسم کے خطرات لاحق ہیں۔ لیکن کوئی سنوائی نہیں ہو رہی۔  
 لہذا من سائل بذریعہ درخواست التجا کرتا ہوں کہ مجھے گورنمنٹ ہائی سیکنڈری سکول بلیا پینہ ہنگو سے تبادلہ کر کے کسی شہری علاقے میں تبادلہ  
 کر کے مشکور فرمائیں۔ بذریعہ دیگر من سائل استغاثی دینے پر مجبور ہو سکتا ہے۔

میں نوازش ہوگی

العارض

روٹی سنگھ نائب قاصد گورنمنٹ ہائی سیکنڈری سکول بلیا پینہ ہنگو  
 11/12/2023

کاپی نو

۱۔ گورنر خیبر پختونخواہ پشاور

۲۔ نگران وزیر اعلیٰ خیبر پختونخواہ پشاور

۳۔ نگران وزیر تعلیم خیبر پختونخواہ پشاور

۴۔ چیف سیکرٹری خیبر پختونخواہ پشاور

۵۔ سیکرٹری بائیر ایجوکیشن پشاور

۶۔ ڈپٹی کمشنر ضلع ہنگو

۷۔ ڈسٹرکٹ ایجوکیشن آفیسر ضلع ہنگو

SO(P/M) Manager

Please resolve the issue accordingly

SO(P/M)

Send the case to the Director for transfer for

Director  
 20/12/23  
 Director  
 20/12/23

20/12/23

18-12-2023

ATTESTED

High Court Peshawar

بھنور چناب وسٹر کٹ ایجوکیشن افسیسر ہنگو (مردانہ) دام اقبالہ

درخواست بسلسلہ تبادلہ کروانے گورنمنٹ ہائی سیکنڈری سکول بلیا مینہ ہنگو سے  
تا گورنمنٹ مڈل سکول جوزارہ ہنگو

جناب عالی:

- ۱- یہ کہ سائل تحصیل ضلع ہنگو کا پیدائشی، رہائشی اور مستقل باشندہ ہے۔
- ۲- یہ کہ سائل گورنمنٹ ہائی سیکنڈری سکول بلیا مینہ ہنگو میں بطور نائب قاصد اپنی ڈیوٹی سرانجام دے رہا ہے۔
- ۳- یہ کہ سائل کو پتہ چلا ہے کہ متذکرہ بالا سکول گورنمنٹ مڈل سکول جوزارہ ہنگو میں نائب قاصد کی اساسی اپ کے زیر سماعت خالی ہے۔
- ۴- یہ کہ متذکرہ بالا سکول میں کو ہاٹ روڈ کے قریب ہے بدوین وجہ سائل کو متذکرہ بالا سکول تک آمد و رفت میں آسانی بھی ہے۔
- ۵- یہ کہ سائل سکھ مذہب سے تعلق رکھتا ہے جبکہ علاقہ بلیا مینہ میں زیادہ طور پر مذہب پرست لوگ موجود ہیں بدین وجہ من سائل کو متذکرہ بالا علاقہ سے خوف ورن محسوس ہوتا ہے۔
- ۶- یہ کہ سائل کا تبادلہ گورنمنٹ ہائی سیکنڈری سکول بلیا مینہ ہنگو سے، تا گورنمنٹ مڈل سکول جوزارہ ہنگو کرنا درکار ہے

لہذا بزریعہ درخواست ہذا استدعا کی جاتی ہے کہ سائل کا تبادلہ گورنمنٹ ہائی سیکنڈری سکول بلیا مینہ ہنگو سے گورنمنٹ مڈل سکول جوزارہ ہنگو کرنے کے مناسب احکامات صادر فرمایا جاوے  
سائل بمعہ اہل عیال تمام عمر اچکے دعا گور ہیں گے مورخہ 12-07-2023  
العارض

کالی ٹوڈ پیٹیشنر ضلع ہنگو

سائل: روی سنگھ ولد کرشن لعل ساکن پریم نگر، ایف سی لائن ضلع ہنگو  
رابطہ نمبر: 0333 5011337

ATTESTED





(31) P. 2 = 19

**OFFICE OF THE DISTRICT EDUCATION OFFICER (M)  
DISTRICT HANGU**



No. 3086 /

Dated: 17/10/2022

To

The Principal  
GHSS Bilyamina Hangu.

Subject: - **APPLICATION**

Memo:

Please refer to the subject cited above, a letter has been addressed to the Provincial Ombudsman by Mr. Ravi Sing s/o Krishan r/o Prem Nagar, Hangu, regarding taking over charge. (Application Copy attached)

It is once again directed that charge may be given with immediate effect to Mr. Ravi Sing s/o Krishan r/o Prem Nagar, Hangu, , who was appointed as Naib Qasid vide this office Endst: No.1734-44 Dated:28/05/2022 at Sr. No. 1 under 5% Minority Candidates Quota.

District Education Officer  
(Male) Hangu.

**Endst: No. & Date Even:**

Copy to the:

1. Director, E&SE Khyber Pakhtunkhwa, Peshawar
2. Deputy Commissioner, Hangu.
3. Mr. Ravi Sing s/o Krishan r/o Prem Nagar, Hangu.
4. Master File

**ATTESTED**

Asst. Secy.  
High Court Peshawar

District Education Officer  
(Male) Hangu.

Smj

17/10/22

19-12-2022



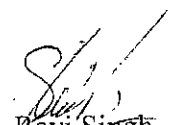
32

P. 8 = 4 (20)

Office of the Principal, Govt. Higher  
Secondary School, Bilyamina HANGU

CHARGE REPORT

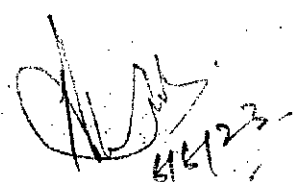
As per direction of the Hon'ble Provincial Ombudsman Khyber Pakhtunkhwa Findings dated 21-03-2023 in Complaint No. 1497/10/2022 and with reference to District Education Officer (M) Hangu Appointment Order No. 1734-44/Class-IV dated 28-05-2022. I, Mr. Ravi Singh assume the charge of the post of Naib Qasid (BPS-03) at Govt. Higher Secondary School Bilyamina, Hangu today 06 / 06 / 2023.

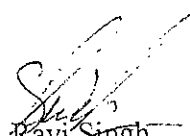
  
Ravi Singh  
Naib Qasid  
Govt. Higher Secondary School  
Bilyamina, Hangu

Endrst: No. 866-72 / Dated: 06 / 06 / 2023

Copy forwarded for information to:

1. Provincial Ombudsman Khyber Pakhtunkhwa.
2. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa
3. Deputy Commissioner, Hangu
4. District Education Officer (M) Hangu
5. District Account Officer, Hangu
6. Mr. Ravi Singh s/o Karishan Lal r/o Prem Nagar, FC Line Hangu
7. Office File

  
4/6/23  
Principal  
G.H.S.S Bilyamina  
Hangu

  
Ravi Singh  
Naib Qasid  
Govt. Higher Secondary School  
Bilyamina, Hangu

ATTESTED

Principal  
Govt. Higher Secondary School  
Bilyamina, Hangu

18-12-2023

No 3578

33

P.S. = 21 Dated 28/09/2023

To

The Principal,  
GHSS Bilyamina  
District Hangu.

Subject: **RAVI SING (N/Q) STATEMENT/REPORT.**  
Memo

You are directed on the subject cited above and to state that Mr. Ravi Sing (N/Q) has taken over charge w.e.f 06/06/2023 vide your Endst No. 866-72 Dated 06/06/2023 as per direction of the Provincial Ombudsman Khyber Pakhtunkhwa. He has taken over charge three months ago, but you have paid for one year as he was not performed any duty w.e.f 06/06/2022. It is pertinent to say that whether he performs his duty now or otherwise.

You are, therefore, directed to report his attendance w.e.f 06/06/2022 to this office and also show his position whether he performs his duty now or otherwise. Moreover, recover the over payment of Mr. Ravi Sing (N/Q), you have made. Please. Since taking over charge...

District Education Officer (Male)  
District Hangu

28/09/23

Endst No & Date Even:

Copy forwarded for information and necessary action to the:-

1. Director (E & SE): Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner Hangu.
3. DDEO (M) Hangu.
4. District Monitoring Officer (EMA) Hangu.
5. Office Copy.

RECEIVED

Sd. [Signature]  
District Education Officer (Male)  
District Hangu 28/09/23

18-12-2023

34

P. 9 1 P. 8 2

22

OFFICE OF THE PRINCIPAL G.H.S.S. Bilyaminis Hangu.

No 916-17

Dated 13-10-2023

To

The District Education Office  
Distt Hangu

Subject :- Mr Ravi Singh (N/Qasid) Charge Report Case -  
Memo :-

As per direction of the Provincial Ombudsman Khyber Pakhtunkhwa Mr Ravi Singh N/Qasid G.H.S.S. Bilyaminis has taken over charge of his post dated 06/6/2022, endorsed by the undersigned dated 06/6/2022. Pay Release Order issued by your worthy office dated 16/6/23 vide Endst No 1762-63, the said employee will draw his pay from the date of taking over charge. So payment was made to Mr Ravi Singh according to your good orders.

So far Mr Ravi Singh duty performance report is concerned, Mr Ravi Singh N/Qasid to perform his duty regularly since the date i.e 06.6.2023 and the undersigned is fully satisfied from his duty. Beyond this date i.e 06.6.2023 the case was subjudice and he (Mr Ravi Singh) was unable to perform school duty. The photocopy of charge report and pay release order is attached.

RECEIVED

Principal  
G.H.S.S. Bilyaminis Hangu

13-12-2023

Principal  
G.H.S.S. Bilyaminis (Hangu)

35

23



The PESHAWAR HIGH COURT Peshawar

All communications should be addressed to the Registrar Peshawar High Court, Peshawar and not to any official by name.

Exch: 9210149-58
Off: 9210135
Fax: 9210170
www.peshawarhighcourt.gov.pk
info@peshawarhighcourt.gov.pk
phcpsh@gmail.com

No. \_\_\_\_\_/HRC

Dated Peshawar, the \_\_\_\_\_

To

The District Education Officer (Male)
Elementary & Secondary Education Department,
Govt of Khyber Pakhtunkhwa,
Hangu.

Subject: COMPLAINT/APPLICATION (#29044)

Find enclosed herewith a copy of the subject complaint submitted by Mr. Ravi Singh, for your report, within Two Weeks, to be placed before hon'ble the Chief Justice.

Director,
Human Rights Cell
Ph: No. 091-9213023
Fax No: 091-9210728

Encl. No. 3928/HRC

Dated Peshawar, the 27/10/23

Copy forwarded for information to:

Mr. Ravi Singh S/O Krishan Lal R/O Prame Nagar Near F.C Line, Hangu.
shahzeb.dilber100@gmail.com

Director,
Human Rights Cell

RECEIVED

ISMAIL AHMAD
Advocate
High Court Peshawar

18-12-2023

36

24



The PESHAWAR HIGH COURT Peshawar

All communications should be addressed to the Registrar Peshawar High Court, Peshawar and not to any official by name.

Exch: 0210148-58  
Off: 0210135  
Fax: 0210170  
www.peshawarhighcourt.gov.pk  
info@peshawarhighcourt.gov.pk  
phcpsh@gmail.com

No. 3499 DRC

Dated Peshawar, the 13/9/23

To The District Education Officer (Female)  
Elementary & Secondary Education Department,  
Govt of Khyber Pakhtunkhwa,  
Hangu.

Subject: COMPLAINT/APPLICATION (#29044)

I am directed to forward herewith a copy of the subject complaint/application submitted by Mr. Ravi Singh, with the direction of his Lordship Hon'ble the Chief Justice "Let the DEO Hangu to Sympathetically consider transfer request to an appropriate Govt Higher Secondary School where he is to perform his duty without fear and threats being minority", for compliance.

Director  
Human Rights Cell  
Ph. No. 091-9213023  
Fax No. 091-9210728

Encl. No. 3500 DRC

Dated Peshawar, the 13/9/23

Copy forwarded for information to:

Mr. Ravi Singh S/O Krishan Lal R/O Prame Nagar Near F.C Line, Hangu  
shahzeb.dilber100@gmail.com

Director,  
Human Rights Cell

ATTESTED

High Court Peshawar

18-12-2023

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DS



The PESHAWAR HIGH COURT Peshawar

All communications should be addressed to the Registrar Peshawar High Court, Peshawar and not to any official by name.

Exch: 9210149-58 Off: 9210135 Fax: 9210170

www.peshawarhighcourt.gov.pk info@peshawarhighcourt.gov.pk phcpsh@gmail.com

No. \_\_\_\_\_/MRC

Dated Peshawar, the \_\_\_\_\_

To

REMINDER

The District Education Officer (Male) Elementary & Secondary Education Department, Govt. of Khyber Pakhtunkhwa, Hangu.

Subject: COMPLAINT/APPLICATION (#29044)

Reference this office letter No. 3927/HRC dated: 27-10-2023, on the subject complaint and to say that reply of the above mentioned letter is still awaited, which may be sent to this office within Two Weeks.

Director, Human Rights Cell Ph: No. 091-9213023 Fax No: 091-9210728

Encl. No. 4070 MRC

Dated Peshawar, the 13/11/23

Copy forwarded for information to:

Mr. Ravi Singh s/o Krishan Lal r/o Prame Nagar Near F.C Line, Hangu. shahzeb.dilber100@gmail.com

Director Human Rights Cell

19-12-2023

ATTESTED

Handwritten signature

REGISTRAR PESHAWAR HIGH COURT PESHAWAR

38

26



**OFFICE OF THE DISTRICT EDUCATION OFFICER (M)**  
DISTRICT HANGU (0925-621083) [teohangu@gmail.com](mailto:teohangu@gmail.com)



No7065

Dated:11/12/2023

To

Mr. Ravi Singh (Naib Qasid)  
R/o FC Line, Prem Nager,  
District Hangu

Subject: Provision of Information

Memo

Reference of your application on 01-11-2023 on the subject cited above the request information is hereby submitted to your good as desired, please. Detail of Vacant posts of Naib Qasid as under.

1. Vacant Post of Naib Qasid at GMS Ghola China Hangu & GMS Jauzara Hangu

*[Signature]*  
DISTRICT EDUCATION OFFICER (M)  
DISTRICT HANGU

Endst: Even No. & Dated

Copy to the:-

1. Assistant Registrar, Peshawar, KP, Information Commission, Divisional Office, Peshawar.
2. Office Copy

*[Signature]*  
DISTRICT EDUCATION OFFICER (M)  
DISTRICT HANGU

**ATTESTED**

*[Signature]*  
ADVOCATE  
High Court Peshawar



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# وکالت نامہ

Before The Honourable Service Tribunal / عدالت

SCANNED KPST Peshawar

~~Handwritten signature~~

Civil Appeal

موردہ  
مقدمہ  
دعوی  
جرم

Mob - 03005981025  
Number

Ravi Singh

Distt Education Officer  
Hafiz  
باعت خیرے آنکھ  
and others

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطہ دہری وی وجواب وہی وکیل کارروائی، متعلقہ  
 خان - سید محمد طارق  
 ایڈووکیٹ ارمان علی  
 آن مقام پشاور کیلئے اشتیاق احمد جس  
 مقرر کر کے اقرار کیا جاتا ہے۔ کہ وکیل موصوف کو مقدمہ کی کل کارروائی کا مکمل اختیار حاصل ہوگا  
 نیز وکیل صاحب کو عرضی دعویٰ داخل کرنے، جواب دعویٰ، اپیل، نظر ثانی کا بھی اختیار حاصل ہو  
 گا نیز وکیل صاحب بصورت ذکر بر خلاف من اختیار و ہمدہ اپیل، بگرانی، نظر ثانی از عدالت ابتداء  
 تا عدالت اعلیٰ یعنی سپریم کورٹ آف پاکستان دائر کر سکتا ہے وکیل موصوف بصورت عدم دہری  
 کارروائی یکطرفہ یا دگری یکطرفہ بخلاف درخواست دائر کر سکتا ہے اور وکیل موصوف میری جانب  
 سے مقدمہ میں بصورت ذکر چیک یا نقد روپیہ کی شکل میں وصولی کر سکے گا اور مزید یہ کہ وکیل  
 موصوف مقدمہ تذکرہ کی کل یا جزوی کارروائی کیلئے اپنی بجائے دیگر وکیل بھی اپنے ساتھ مقرر کر سکتا  
 ہے جس کو بھی وہ جملہ اختیار حاصل ہو سکے جو کہ وکیل موصوف کو حاصل ہیں مجھے اس صورت میں  
 تمام سائنسہ پر واضحہ منظور و قبول ہوگا لہذا میں نے وکالت نامہ بذرا تکریر کر کے اس پر دو خطا نشان  
 انگشت ثبت کر دیا ہے تاکہ سند رہے۔

12 Dec 2023  
20

Mohsini

Ravi Singh  
S/O Krishan Lal  
14101-5933430-7  
Accepted  
Handwritten signature