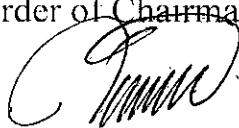


FORM OF ORDER SHEET

Court of _____

Appeal No. 449/2024


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	27/03/2024	<p>The appeal of Mr. Said Ghani resubmitted today by the clerk of counsel. It is fixed for preliminary hearing before touring Single Bench at Swat on 09.05.2024. Parcha Peshi given to the clerk of counsel.</p> <p>By the order of Chairman</p>  <p>REGISTRAR</p>

The appeal of Mr. Said Ghani received today i.e on 21.03.2024 is incomplete on the
procedure which is returned to the counsel for the appellant for completion and
within 10 days.

Page no. 10, 36, 37 & 41 of the appeal are illegible which may be replaced by
legible/better one.

NO 643 JS.I,

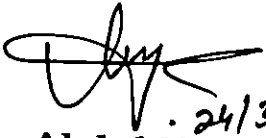
21-03


21/3/24
REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Abdul Nasir Adv.

Advocate High Court

R/Sir, All the objections have been
removed, hence re-submitted, please.


. 24/3/2024
Abdul Nasir
Advocate High Court

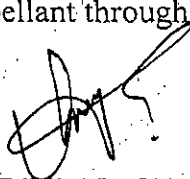
BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL

Service Appeal # 449 of 2024
Said Ghani, Senior Clerk V E R S U S The Director etc

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5.	Adjustment order as KPO/CO 02.02.2013	C	15
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8.	Judgment 04.03.2015 of service tribunal	F	20-21
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10.	Comments	H	25-26
11.	Appeal dismissed order 23.12.2016	I	27
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20.	Wakalatnama	-	67

Appellant through Counsel


ABDUL NASIR
Advocate High Court
Cell No. 0344 455 7383
grapixworld@yahoo.com

CHAMBER: Continental Plaza, Makanbagh, Mingora, Swat.

(1)

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL

Service Appeal # 449 of 2024

Said Ghani, Senior Clerk (BPS-14) office of the District
Education Officer (M) Swat.

(Appellant)

V E R S U S

- 1) The Director Elementary & Secondary Education
Khyber Pakhtunkhwa at Peshawar.
- 2) District Education Officer (M) Swat.
- 3) Tariq Ali, Senior Clerk, office of the SDEO (M)
Timergara Dir Lower.

(Respondents)

APPEAL UNDER SECTION 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL AGAINST
THE ORDER NO. 5629 DATED 16.01.2024 PASSED
BY RESPONDENT NO. 1, RECEIVED THROUGH
LETTER NO. 7011-12 DATED 24.02.2024 OF
RESPONDENT NO. 2, WHEREBY THE APPEAL OF
APPELLANT FOR PROMOTION W.E.F 30.05.2017
WITH ALL BACK BENEFITS AND RECTIFICATION
OF SENIORITY THEREFROM HAS BEEN REJECTED
WHEREBY THE PROMOTION ORDER NO. 5283-86
DATED 13.09.2023 WAS MAINTAINED.

Respectfully Sheweth:

Brief facts leading to the present appeal are as
under:

1. That initially the appellant was appointed as
Junior Clerk (BPS-5) in the office of respondent
No. 2 vide order No. 1186-91 dated 26-05-1991,
(Annexure A)

2. That till 2011 the appellant remained at serial No. 69 of the seniority list of Junior Clerks, just above the respondent No. 3 who was figured at serial No. 70. (**Annexure B**)

3. That vide order of respondent No. 2 bearing endst. No. 6098-6102 dated 02.02.2013, the appellant was adjusted/regularized as Computer Operator BPS-12. (**Annexure C**)

4. That the *ibid* order was cancelled/withdrawn vide order No. 11192-98 dated 12.06.2013 by the respondent No. 2. (**Annexure D**)

5. That this cancellation was impugned by the appellant through an appeal before the respondent No. 1. (Memo of appeal is **Annexure E**)

6. That thereafter the appellant knocked the door of this learned tribunal and vide judgment dated 04.03.2015, this learned tribunal while dismissing the appeal(s) in *limine* kept the appellant at liberty for his due right including right of promotion, financial benefits and recovery of the stated overpayment. (Judgment dated 04.03.2015 of this tribunal is **Annexure F**)

7. That in the light of above, the appellant filed an appeal before the respondent No. 1 for redressal of his grievances. (Copy of reconsideration appeal is **Annexure G**)

8. That the respondent No. 1, sought comments from respondent No. 2, which he submitted. (Comments are **Annexure H**)
9. That after receiving the comments, the respondent No. 1 has dismissed the appeal vide order dated 23.12.2016 with the directions to appellant that "They shall continue against their substantial post as junior clerk as usual". Copy of order dated 23.12.2016 is **Annexure I** .
10. That once again this order was impugned by the appellant before this right honourable tribunal vide appeal No. 1 of 2017. Memo of appeal is **Annexure J**)
11. That this learned tribunal vide judgment dated 04.03.2020 dismissed the appeal of appellant and maintained the orders of respondent No. 1 and 2. (Copy of judgment dated 04.03.2020 is **Annexure K**)
12. That the above judgment was assailed by the appellant before the Apex Court, however, during pendency of the CPLA, upon the directions of respondent No. 1, an Inquiry Committee was constituted for the purpose that what would be the future of appellant when his appointment as Computer Operator was cancelled and maintained upto the Service Tribunal.

4

13. That the Inquiry Committee consisted of Director (F&A) and Assistant Director (LIT) recommended the following to the respondent No. 1:

1. *The case of the applicants is subjudice/under trial in the august Supreme Court of Pakistan so the mentioned recommendation may be implemented after the outcome of the CPLA filed by the applicants.*
2. *Their names should be included in the seniority list of J/C from the 1st appointment.*
3. *They may be promoted in their own cadre.*
4. *They may be promoted in their own cadre to the posts as their other colleagues/person got promotion.*

Inquiry report a/w with letter is **Annexure L**)

14. That in the light of above recommendation, the appellant does not press his CPLA before the Apex Court and as such withdrawn the same with protective order of the payment(s) received during the tenure of Computer Operator vide order dated 27.04.2023. (Copy of order dated 27.04.2023 of the Supreme Court is **Annexure M**)

15. That all of a sudden, the respondent No. 1 failed to implement the recommendations of the Inquiry Committee and passed impugned promotion order dated 13.09.2023 with immediate effect instead of 30.05.2017 whereupon the colleagues/respondent No. 3 has been promoted. (Impugned promotion Order dated 13.09.2023 is **Annexure N**)

16. That being aggrieved, the appellant impugned the above promotion order, vide appeal dated 04.10.2023 before the respondent No. 1. (Memo of appeal is **Annexure O**)
17. That the *ibid* appeal has been rejected by the respondent No. 1 vide order dated 16.01.2024, communicated to the appellant through respondent No. 2 vide letter dated 24.02.2024. (**Annexure P**)
18. That feeling aggrieved from the impugned herein orders, the appellant having no other adequate remedy available except to approach this august Court for just, efficacious and effective relief, hence the instant appeal *inter alia* on the following amongst other grounds:

GROUND:

- i) That when the appellant's order as computer operator was withdrawn then the status of appellant as junior clerk has automatically been restored. This fact has also been admitted by the Inquiry Committee, but the respondent No. 1 and 2 has illegally denied to promote the appellant from 30.05.2017 with all back benefits and his due seniority. Reliance is placed on "**Kalim Arshad Khan vs Peshawar High Court through Registrar**" reported as **2022 PLC CS 398 Peshawar**. (Current pay slips of appellant, current Final Seniority List and promotion order dated 30.05.2017 are **Annexure Q**)

- ii) That the appellant has rightly served the department for the period from 26.05.1991 till date and his other colleagues are by now on senior posts, thus, the appellant is lawfully entitled for the promotion from 30.05.2017 with all back benefits and his due seniority on the basis of golden principles of *locus poenitentiae* and *Rule of Consistency*.

- iii) That the respondents 1 & 2 are duty bound to act in accordance with law and recommendations of the Inquiry Committee rather they are acting in arbitrary and malafide manner and are reluctant to promote the appellant from 30.05.2017 with all back benefits and his due seniority.

- iv) That the impugned orders through which the lawful promotion of the appellant was denied, are against the spirits of merits and such orders of the respondent No. 1 and 2 are equal to defeating struggles for the elimination of poverty and wide class distinction in society, therefore, on this core too the said orders of respondent No. 1 and 2 are liable to be modified, hence, such action of the respondent No. 1 is nothing but the clourful exercise of powers and therefore needs correction. Moreso, it is crystal clear from the perusal of inquiry report that the appellant was recommended for promotion from the day when his colleagues were promoted i.e from 30.05.2017 with all back benefits and his due seniority. So, while brushing aside the recommendations of

inquiry committee, the respondent No. 1 has landed into the field of errors.

- v) That despite his own letter/order No. 927 dated 23.08.2022, the respondent No. 1 is not complying with the recommendations of the Inquiry Committee which is against the law and norms of justice therefore, untenable. Even otherwise, the appellant is entitled to his due seniority and promotion i.e from 30.05.2017 with all back benefits.
- vi) That if the Courts of law countenanced and approved such naked exercise of authority, it would make a mockery of law and travesty of justice. Besides, it would not give a message of hope to the honest and the scrupulous and might tend to undermine their confidence, which is not in the interest of anybody in the long run. The employees are not to be made rolling stones.
- vii) That the orders impugned herein of respondents are against the endeavours of State machinery for establishing the State's writ of equality enshrined and safeguarded by the constitution and other rules applied thereto, therefore, liable to be declared null and void.
- viii) That the impugned herein orders are the result of political pressure and elite class interference, but the respondents in violation of the law, turned down the recommendations of Inquiry Committee,

(8)

therefore, such order is totally against the natural justice and the respondents have done a great miscarriage of justice by siding the favoritism and nepotism, therefore, it is necessary for this hon'ble Court to declare the said orders null and void and promoted the appellant from 30.05.2017 with all back benefits and seniority.

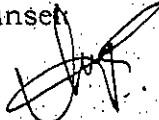
- ix) That further grounds would be advanced during the course of arguments with prior permission of this Hon'ble Court.

PRAYER:

It is, therefore, very humbly prayed that on acceptance of this Service Appeal; by setting aside the impugned orders:

- a) The appellant may kindly be promoted w.e.f 30.05.2017 with all back benefits as his other batchmate/colleague(s) were promoted.
- b) The name of the appellant may kindly be mentioned at serial No. 296, just above respondent No. 3 as the appellant is senior to him.
- c) Any other remedy which your honour may deem fit and appropriate and has not been specifically prayed for, may also very graciously be granted/ordered, please.

Appellant through
counsel


ABDUL NASIR
Advocate High Court

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL

Service Appeal # _____ of 2024

Said Ghani, Senior Clerk (BPS-14) office of the District
Education Officer (M) Swat.

(Appellant)

V E R S U S

- 1) The Director Elementary & Secondary Education
Khyber Pakhtunkhwa at Peshawar.
- 2) District Education Officer (M) Swat.
- 3) Tariq Ali, Senior Clerk, office of the SDEO (M)
Timergara Dir Lower.

(Respondents)

AFFIDAVIT

I, Said Ghani, (appellant) do hereby affirm that the
contents of the instant service appeal are true and correct to
the best of my knowledge and belief and nothing has been
kept concealed from this Hon'ble Court.



Deponent,

[Signature]
Said Ghani

BETTER COPY

10

OFFICE ORDER

APPOINTMENT

Appointment of the following Junior Clerks are hereby ordered with immediate effect in BPS,NO.5 @RS.700-25-1500 plus usual allowances as admissible under the Rules:-

<u>S.No.</u>	<u>Name & Post</u>	<u>Father's Name</u>	<u>Residence</u>	<u>Office where posted</u>	<u>Remarks</u>
1.	Tariq Ali	Bakht Rawan	Haji Abad, Saidu	DEO(M) Primary Swat	N.C.Post
2.	Said Ghani	Said Faqir	Shagai,Saidu Sharif	-do-	-do-
3.	Mohd Rahman	H,Saifur Rehman	Banr Mingora	-do-	-do-

TERMS & CONDITIONS.

1. Their service is liable to termination/Reversion at any time without any reason being assigned.
2. In case of resignation they will have to submit one month Pay in lieu thereof to the Govt.:
3. He is required to produce Health and Age Certificate from the Medical Superintendent concerned before taking over charge.
4. No TA/DA is allowed.
5. Charge report should be submitted to all concerned.
6. They should not be allowed to take over charge if their age exceeds 28 Years or below 18 years.
7. If they fail to make over charge of the post within fourteen days after the issue of these orders their appointment shall be cancelled.

Sd/-

(FAZLI NAEEM KHAN)
DISTRICT EDUCATION OFFICER(M)
PRIMARY EDU:SWAT

OFFICE OF THE DISTRICT EDUCATION OFFICER(M) PRIMARY EDUCATION SWAT

Endst:No.1186-91/

Dated 26-5-1991

Copy forwarded to:-

1. The Director of Education(S) Primary Education, NWFP, Peshawar.
2. The District Accounts Officer Swat.
3. The Accountant local office.
4. 4-5. The candidates concerned.

Sd/-

DISTRICT EDUCATION OFFICER(M)
PRIMARY EDU:SWAT

R.NAZIR/**

Attested
Advocate

APPOINTMENT:

Appointment of the following Junior Clerks are hereby ordered with immediate effect in BPS:MO.5 @ Rs.700-25-1300 plus usual allowance as admissible under the Rules:-

S.NO.	Name & Post	Father's Name	Residence	Office where posted	Remarks
1.	Tariq Ali	Bakhtul Karwan	Haji Road, Saidu	DEO(M) Primary Swat	M.C.Post
2.	Said Ghani	Said Faqir	Shajai, Saidu Sharif	-do-	-do-
3.	Mohd Rahman	H.Saifur Rahman	Dani, Saidu, Swat	-do-	-do-

TERMS & CONDITIONS.

1. Their services is liable to termination/Reversion at any time without any reason being assigned.
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5. Charge report should be submitted to all concerned,.
6. They should not be allowed to take over charge if their age exceed 28 years or below 18 years.
7. If they fail to make over charge of the post within fourteen days after the issue of these order their appointment shall be cancelled.

(FARUKI NAZAM KHAN)
DISTRICT EDUCATION OFFICER(M)
PRIMARY EDU: SWAT

OFFICE OF THE DISTRICT EDUCATION OFFICER(M) PRIMARY EDUCATION SWAT.

Order No. 1186-91

Dated: 2-6-5-1991

Copy forwarded to:-

1. The Director of Education(S) Primary Education, NWFP, Peshawar.
2. The District Accounts Officer Swat.
3. The accountant Local Office.
4. The candidates concerned.

M. RAHIM

DISTRICT EDUCATION OFFICER(M)
PRIMARY EDU: SWAT

Atteste
Advocate

SHARIF
Assistant District Officer (M)
Elementary & Secondary Education
Swat.

"B"
 11

OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY AND SECONDARY EDUCATION SWAT AT GULKADA.
SENIORITY LIST OF JUNIOR CLERK IN ELEMENTARY AND SECONDARY EDUCATION SWAT UP TO 31/08/2011

S.NO	NAME	FATHER NAME	POST	DOMCILE	D/O.BIRTH	D/O 1ST APPTT: IN EDUCATION DEPTT:	D/O OF TAKING OVER CHARGE IN THE PRESENT POST	D/O AWARD SELECTIO GRADE	Present School/Offcie
1	Yousaf/SHAN	Midirarul Haq	J/Clerk	Swat	10/02/1956	21/10/1981	21/10/1981 ✓	01/11/1988	GHS Qambar
2	Abdul Wahid	Abdul Matin	J/Clerk	Swat	20/03/1963	25/08/1986	25/08/1986 ✓	01/10/1993	GHS Tall
3	Umar/Rashad	Fazal Wahid	J/Clerk	Swat	01/01/1961	23/09/1986	23/09/1986 ✓	31/05/1994	GHS Chupril
4	Ali Akbar	Ghulam Habib	J/Clerk	Swat	20/04/1962	01/11/1986	01/11/1986	01/10/1994	GHS Chamtalai
5	Fazal Wahab	Said Karim	J/Clerk	Swat	06/02/1955	03/11/1986	03/11/1986	01/10/1994	GHS Kass Shingarai
6	Shah Afzal	Abdul Manan	J/Clerk	Swat	25/01/1966	22/11/1986	22/11/1986	24/05/1995	GHSS Kabal
7	Nisar Ahmad	Ghulam Mehmood	J/Clerk	Swat	01/01/1963	30/11/1986	30/11/1986	25/05/1995	GHSS Shamoza
8	Abdul Salam	Abdul Manan	J/Clerk	Swat	03/05/1960	01/01/1987	01/01/1987	01/07/1996	GHS Dardyal
9	Sher Ahmad	Qasim Jan	J/Clerk	Swat	15/11/1959	12/02/1987	12/02/1987	10/01/1996	GHS Kanju
10	Zahir Shah ✓	Rahman Gul	J/Clerk	Swat	04/04/1963	30/04/1987	30/04/1987	07/01/1997	GGHS Panr ✓
11	Nisarud Din ✓	Sharfuddin	J/Clerk	Swat	25/12/1959	20/09/1987	20/09/1987	01/06/2001	GHS Sakhra ✓
12	Bakht Ravan ✓	Bakht Baidar	J/Clerk	Swat	03/03/1962	24/10/1987	24/10/1987	01/06/2001	GGHS Zera Khela ✓
13	Hafizur Rahman ✓	Muambar Khan	J/Clerk	Swat	01/01/1957	01/03/1988	01/03/1988	01/06/2001	O/O D.D.O(M) Pny Swat ✓
14	Jehanqir ✓	Siahosh Khan	J/Clerk	Swat	01/10/1964	01/03/1988	01/03/1988	01/06/2001	GHS Tindodag ✓
15	Riaz Ahmad ✓	Reekhmeen	J/Clerk	Swat	11/09/1965	01/03/1988	01/03/1988	01/06/2001	O/O E.D.O(E&S) Swat ✓
16	Fazal Rahman ✓	Muhyud Din	J/Clerk	Swat	02/07/1961	01/09/1988	01/09/1988	01/06/2001	GGHSS Matta ✓
17	Jan Muhammad ✓	Amir Muhammad	J/Clerk	Swat	01/01/1970	06/09/1988	06/09/1988	01/06/2001	GGHSS Khawaza Khela ✓
18	Muhammad Quraish	Muhammad Darawish	J/Clerk	Swat	01/04/1966	15/10/1988	15/10/1988	01/06/2001	GHS Khazana
19	Rauf Ahmad	Muhammad Khan	J/Clerk	Swat	03/03/1971	20/09/1989	20/09/1989	01/06/2001	O/O DDO.(M) Swat
20	Jan Muhammad ✓	Bahram Khan	J/Clerk	Swat	03/03/1967	02/10/1989	02/10/1989	01/06/2001	GGHSS Manglor ✓
21	Muhammad Jamal ✓	Abdul Jalal	J/Clerk	Swat	02/02/1964	03/10/1989	03/10/1989	01/06/2001	GHS Ningolai ✓
22	Muhammad Sheraz ✓	Mehronish Khan	J/Clerk	Swat	01/04/1969	04/10/1989	04/10/1989	01/06/2001	O/O DDO.(M) Swat ✓
23	Zoor Muhammad Khan	Azim Khan	J/Clerk	Swat	06/03/1966	05/11/1989	05/11/1989	01/06/2001	GHSS Balogram
24	Mian Gul Rahman ✓	Ilbar Shah	J/Clerk	Swat	19/06/1955	18/11/1989	18/11/1989	01/06/2001	GGHSS S/Sharif ✓

9

Attested
 Advocate

25	Muhammad Isa	Abdul Aziz	J/Clerk	Swat	01/10/1954	04/12/1989	04/12/1989	01/06/2001	GHSS Kabal
26	Muhammad	Akbar Khan	J/Clerk	Swat	01/04/1969	04/12/1989	04/12/1989	01/06/2001	GHS Chitor ✓
27	Fazal Ahad	Abdul Kamal	J/Clerk	Swat	10/04/1969	04/12/1989	04/12/1989	01/06/2001	O/O E.D.O(E&S) Swat
28	Ihsanullah Khan	Gul Zarin Jan	J/Clerk	Swat	01/05/1970	05/12/1989	05/12/1989	01/06/2001	GGHS Kalay Kalay ✓
29	Barkat Ali	Usman Ali	J/Clerk	Swat	01/04/1968	07/12/1989	07/12/1989	01/06/2001	GHS Amankot
30	Muhammad Afzal	Umaer Khan	J/Clerk	Swat	15/03/1962	09/12/1989	09/12/1989	01/06/2001	GHSS Charbagh
31	Muhammad Farooq	Mumtaz Ali	J/Clerk	Swat	15/01/1965	11/12/1989	11/12/1989	01/06/2001	GHSS Baidara
32	Dawa Khan	Amir Jalal	J/Clerk	Swat	10/06/1972	11/12/1989	11/12/1989	.0	GHS Parrai
33	Fazal Rahman	Wafa Muhammad	J/Clerk	Swat	01/01/1967	04/03/1990	04/03/1990	.0	GHS Gulibagh.
34	Habibullah	Fazal Rahman	J/Clerk	Swat	08/11/1970	02/05/1990	02/05/1990	.0	GHS Shalhand
35	Sardar Khan	Mian Sher	J/Clerk	Swat	04/01/1965	05/05/1990	05/05/1990	.0	GHS Bahrain
36	Bakht Sher Ali Khan	Mian Muner	J/Clerk	Swat	01/06/1966	05/05/1990	05/05/1990	.0	O/O E.D.O(E&S) Swat
37	Haider Ali	Zoor Talab Khan	J/Clerk	Swat	02/03/1968	05/05/1990	05/05/1990	.0	O/O E.D.O(E&S) Swat
38	Nadar Khan	Fazal Rahim	J/Clerk	Swat	03/05/1969	05/05/1990	05/05/1990	.0	GHS Deolai
39	Ahmad Ghani	Dawood Khan	J/Clerk	Swat	15/02/1970	05/05/1990	05/05/1990	.0	GHS Dherai
40	Shorab Khan	Muhammad Karam	J/Clerk	Swat	01/04/1970	05/05/1990	05/05/1990	.0	O/O E.D.O(E&S) Swat ✓
41	Ifikharud Din	Muhammad Shah Khan	J/Clerk	Swat	01/04/1971	05/05/1990	05/05/1990	.0	GGHS Totano Bandai ✓
42	Zahir Shah	Jamshid Khan	J/Clerk	Swat	01/01/1968	06/05/1990	06/05/1990	.0	GHS Labat
43	Muhammad Shuaib	Shah Tullah Khan	J/Clerk	Swat	01/01/1966	06/05/1990	08/05/1990	.0	GHS Shawar
44	Abdullah	Abdul Halim	J/Clerk	Swat	01/01/1963	09/05/1990	09/05/1990	.0	GHS Shaipin
45	Ali Rahiman	Saifur	J/Clerk	Swat	10/04/1969	10/05/1990	10/05/1990	.0	O/O E.D.O(E&S) Swat
46	Pir Muhammad Khan	Amir Salam Khan	J/Clerk	Swat	08/04/1971	12/05/1990	12/05/1990	.0	GHS Kokarai
47	Syed Ahmad Rashid	Syed Abdur Rashid	J/Clerk	Swat	10/04/1969	15/05/1990	15/05/1990	.0	GHS Manai
48	Tahsinullah	Gul Sher	J/Clerk	Swat	01/04/1960	01/06/1990	01/06/1990	.0	GHS Kedam
49	Saleem Shah	Shahbud Din	J/Clerk	Swat	14/08/1965	01/06/1990	01/06/1990	.0	GGHS Bankot ✓
50	Amjad Ali	Purdil Khan	J/Clerk	Swat	01/04/1969	09/07/1990	09/07/1990	.0	O/O E.D.O(E&S) Swat ✓
51	Muhammad Khitab	Sanobar Mian	J/Clerk	Swat	01/03/1967	29/07/1990	29/07/1990	.0	GHSS Kishwar ✓
52	Muhammad Salim Naz	Muhammad Dilbar	J/Clerk	Swat	16/04/1968	21/08/1990	21/08/1990	.0	GGHS No.2.S/Sharif
53	Sham Sher Ali	Abdul Maula	J/Clerk	Swat	01/04/1967	02/09/1990	02/09/1990	.0	GHS Odigram

Attested
3
Advocate

13

54	Shaukat Ali ✓ ✓	Fazli Karim Jan	J/Clerk	Swat	02/02/1973	08/12/1990	08/12/1990	.0	GGHS No.1.Mingora ✓
55	Fazal Ali ✓	Sher Zada Khan	J/Clerk	Swat	13/06/1965	13/01/1991	13/01/1991	.0	GHS Aboha ✓
56	Muhammad Rahim	Shah Rawan	J/Clerk	Swat	04/05/1964	15/01/1991	15/01/1991	.0	GHSS Mankyal
57	Fazal Rabi ✓ ✓	Abdul Hakeem	J/Clerk	Swat	13/02/1966	15/01/1991	15/01/1991	.0	GGHS Fazal Abad Kanju ✓
58	Mian Hussain	Mian Aziz Jan	J/Clerk	Swat	02/02/1966	16/01/1991	16/01/1991	.0	GHS Bandai
59	Ismail	Amir Ghazi	J/Clerk	Swat	13/06/1972	16/01/1991	16/01/1991	.0	GHSS Fatehpur
60	Aftab Ahmad Khan	Sultanat Khan	J/Clerk	Swat	01/03/1972	17/01/1991	17/01/1991	.0	GHSS Mingora
61	Nisar Ahmad	Qasim Jan	J/Clerk	Swat	02/04/1968	23/01/1991	23/01/1991	.0	GHS Kanju
62	Muhammad Naeem	Muhammad Ishaq	J/Clerk	Swat	04/02/1970	23/01/1991	23/01/1991	.0	GHS Sersenai
63	Bakht Ali	Amir Zarin	J/Clerk	Swat	11/11/1967	27/01/1991	27/01/1991	.0	GHSS Khawaza Khela
64	Mayan Khan	Izat Mand	J/Clerk	Swat	15/01/1969	01/02/1991	01/02/1991	.0	GHS Durush Khela
65	Jamalud Din	Abdur Rahman	J/Clerk	Swat	15/02/1971	19/05/1991	19/05/1991	.0	GHSS Kabal
66	Rahmatullah	Abdur Rashid	J/Clerk	Swat	19/04/1963	27/05/1991	27/05/1991	.0	GHS Manyar
67	Rashid Iqbal	Muhammad Junaid	J/Clerk	Swat	11/07/1971	27/05/1991	27/05/1991	.0	GHS Topsin
68	Muhammad Rahman ✓	Saifur Rahman	J/Clerk	Swat	10/03/1967	28/05/1991	28/05/1991	.0	GGHS No.2.Mingora ✓
69	Said Ghani	Said Faqir	J/Clerk	Swat	13/04/1969	28/05/1991	28/05/1991	.0	O/O E.D.O(E&S) Swat
70	Tariq Ali	Bakht Rawan	J/Clerk	Swat	02/04/1971	28/05/1991	28/05/1991	01/07/2001	O/O D.D.O(M) Pry Swat
71	Muhammad Nisar Khan	Abdul Matin Khan	J/Clerk	Swat	15/01/1957	05/09/1991	05/09/1991	.0	GHS Beha
72	Bahri Rahmat ✓ ✓	Jehangir Khan	J/Clerk	Swat	14/04/1973	09/05/1992	09/05/1992	.0	GGHSS Odigram ✓
73	Ali Khan	Sultan Mahmood	J/Clerk	Swat	01/02/1971	13/05/1992	13/05/1992	.0	GHS Jambil
74	Arif Jan ✓ ✓	Sher Bahadar Khan	J/Clerk	Swat	07/05/1964	16/05/1992	16/05/1992	.0	GHS Chail
75	Anwarul Haq ✓ ✓	Muhammad Sakir	J/Clerk	Swat	01/04/1967	25/08/1992	25/08/1992	.0	GGHS Charbagh
76	Muhammad Rasool Khan	Umara Khan	J/Clerk	Swat	01/01/1969	07/10/1992	07/10/1992	.0	O/O D.D.O(M) Pry Swat
77	Fazal Wadood	Abdul Wadood	J/Clerk	Swat	11/05/1969	01/11/1992	01/11/1992	.0	GHS No.4.Mingora
78	Faisal Rasool ✓ ✓	Ghulam Rasool	J/Clerk	Swat	01/04/1972	01/08/1993	01/08/1993	.0	GGHS Kokrai ✓
79	Khurshid Ali ✓ ✓	Younas Khan	J/Clerk	Swat	01/04/1970	20/12/1994	20/12/1994	.0	GGHS Gwelerai ✓
80	Abdul Khaliq	Abdul Sadiq	J/Clerk	Swat	11/03/1971	01/04/1995	01/04/1995	.0	O/O E.D.O(E&S) Swat
81	Muhammad Rashad	Muhammad Sher Ali	J/Clerk	Swat	01/01/1973	16/05/1995	16/05/1995	.0	GHS Fatehpur ✓
82	Khurshid Ali	Mian Ghafoor Khan	J/Clerk	Swat	05/02/1968	22/05/1995	22/05/1995	.0	GHS Gwelerai

Q

Attested
Advocate

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) SWAT AT GULKADA

OFFICE ORDER.

Annexure BS
C-4
15

Consequent upon being a competent authority and delegation of Powers the following computer operator arc hereby adjusted/regularize in BPS-12 in the Office of the District Education officer (M),swat with immediate effect in the best interest Of public service.

- 01: Abdul Khaliq computer operator B-12
- 02: Said Ghani computer operator B-12.

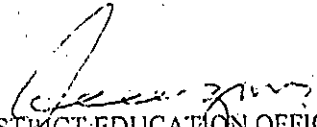
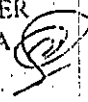
Necessary entries to this effect should be made in their Original service Book,accordingly.


(GUL ZAMAN KHAN)
DISTRICT EDUCATION OFFICER
(M)SWAT AT GULKADA.

Endst.No. 6078-6102 dated the 2/2 /2013

Copy forwarded to:

- 01. The District Accounts officer swat for n/action please.
- 02. The Dy:District Education officer(M)Local office.
- 03. The official concerned.
- 04. EMIS Branch local office.
- 05. P.A to the DEO(M)local office.


DISTRICT EDUCATION OFFICER
(M)SWAT AT GULKADA 

ps
lc
Attested

Advocate

Phone: 814283

DIRECTORATE OF PRIMARY EDUCATION SECTOR B-1/25,
PHASE-V, HAYATABAD PESHAWAR

15-A

F.No. 34/DPE/RD&E/TRANSFERS-APPOINTMENTS/AD (RD&E)

Dated: Peshawar the 27th/11/1994

58034-61

Handwritten notes:
F-112
D.P.
11/27/94
24/11/94

Mr. Said Ghani / Abdul Wahid Computer Operators
EMIS Cells Office of the District Education Officer
Male/Female Payi Suwat

Subject: TRANSFERS OF THE CLERKS, WORKING AS COMPUTER OPERATOR,
IN OFFICES OF THE DISTRICT EDUCATION OFFICERS NWFP.

Memo:-

It is to inform that it has been decided and already notified by the Director Primary Education Government of NWFP vide this office Notification F.No. 460\DPE\N&A\Notification\AO dated 26.07.1994 that:

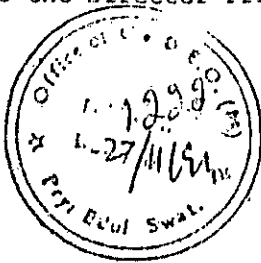
1. "the officials working as Key Punch Operators in the Directorate of Primary Education NWFP, District Education Offices (M&P) Primary and Subdivisional Education Offices shall not be transferred/shifted from their offices/ seats/ positions".
2. "if transfer/shifting order of any Key Punch Operator is issued, he should not be relieved and the matter personally brought to the notice of the Director Primary Education NWFP".
3. "the Key Punch Operator shall not be entrusted any other duty"

In case you have been transferred/shifted, you are directed not to relinquish the charge of your post and contact the undersigned immediately and without any loss of time on the phone No. mentioned above.

(MOHAMMAD FAYYAZ)
Deputy Director (RD&E)

Copy of the above is forwarded for information to:

1. The Chief Planning Officer, Education Department Government of NWFP.
2. The District Education Officer (M/F) _____
3. Dr. Wade M. Robinson COP (I.D).
4. The P.A. to the Director Primary Education NWFP.



Deputy Director (RD&E)

15-3

OFFICE OF THE EXECUTIVE DISTRICT OFFICER LITERACY & EDUCATION S

OFFICE ORDER

Mr. Said Ghani J. Clerk/ KPO is hereby posted as DEOP/KPO against vacant post at office of the undersigned vide the Director Primary Education & Literacy NWFP Peshawar Notification/order Endst:No.1386-1421 dated 16-7-2001 and directed to continue his work in EMIS Computer section Cell as KPO/DEOP. They may be considered online for KPO/DEOP post and entitled for all benefits etc; in the interest of public service.


5-1 -
EXECUTIVE DISTRICT OFFICER
LITERACY & EDUCATION SWAT

Endst:No. 344-681

Dated 18-7-2001

Copy to:-

- 1) The Director Primary Education & Literacy NWFP Peshawar.
- 2) The District Accounts Officer Swat.
- 3) The Deputy Director EMIS Education & Literacy NWFP Peshawar.
- 4) Official concerned.


DISTRICT OFFICER (ADMN: DEV.)
PRY: EDUCATION DISTRICT SWAT

(3)

OFFICE OF THE DISTRICT EDUCATION OFFICER MALE SWAT
GULKADA.

OFFICE ORDER:-

"D"
Advocate

16

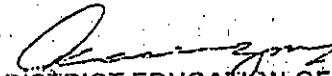
It is hereby notified that the adjustment/promotion order of Mr, Said Ghani, Abdul Khaliq, Anjad Ali and Shahzad Junior clerk B-7 against the posts of Key Punch/Computer Operators BPS-12 in the Office of the District Education Officer Swat, made as a result of gap arrangement, is hereby cancelled in the interest of public service. All kinds of extra and over Financial Advantage received by the above mentioned officials on the same posts w.e.f their adjustment order be deemed as nullity, which be recovered from the concerned officials if any.

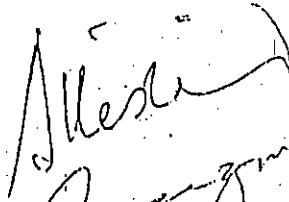
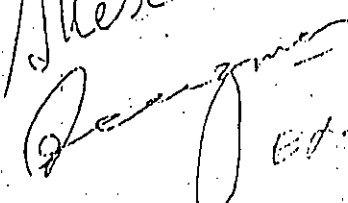
(GUL ZAMAN KHAN)
DISTRICT EDUCATION OFFICER
MALE SWAT.

Endst; No. 11192-98 Dated, Gulkada,
the 12-6- /2013.

Copy forwarded for information and necessary action to the:-

1. Secretary E&SE Govt. of Khyber Pakhtunkhwa at Peshawar.
2. Director E&SE Govt. of Khyber Pakhtunkhwa at Peshawar.
3. District Accounts Officer Swat at Saidu Sharif.
4. Deputy District Education Officer Male Local Office.
5. Deputy District Education Officer Female/Incharge DEO(F) Swat.
6. Officials concerned.
7. RA to DEO (M) Local Office.

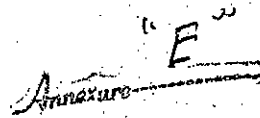

DISTRICT EDUCATION OFFICER
MALE SWAT.




Adv - DEO Swat

Attested

Advocate

The Director Elementary and Secondary
Education, Khyber Pakhtunkhwa,
Peshawar

Signature "E" 

17 


Subject: Appeal against the order Endst: No. 11192-98 dated, Gulkada, the 12-06-2013 (received/communicated on 22-02-2014 vide memo No. 3838-41/Junior clerks dated 22-02-2014) vide which the adjustment of the appellants has been cancelled against the law and rules, hence liable to be set aside.

Respected Sir,

The appellants submit as under:

That the appellants are regular employees in the education department and were promoted / adjusted as Key Punch Operators by the competent authority in accordance with the law and rules. that while performing their duties as KPOs they were served with a notice bearing No. 3575-77/ dated Gulkada the 11-02-2014, wherein, they were informed that they are causing monetary losses, ironically for the job they are doing, in the shape of the salaries and other allowances by making the order impugned herein as the basis for the notice. Strange enough the appellants were asked to provide the order impugned herein, which was lying with DEO Swat and never communicated to the appellants.

That the appellants are still working as KPOs and entry to this effect has also been made in their service books. At this stage this will amount to reversion, which

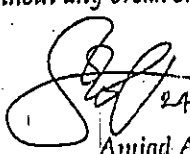
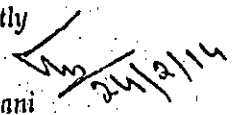
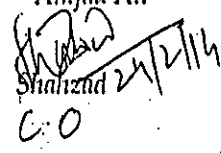
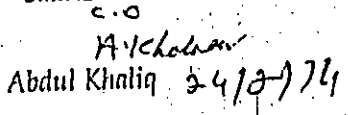
Attested

Advocate


is a major penalty and which cannot be awarded in such a superficial manner and ignoring all the legal formalities mandatory. Moreover it is worth mentioning here that the copy of the order impugned provided to the appellants seems to be maneuvered with, as some comments written on the order impugned seems to have been hidden and the original of the same has never been shown to the appellants till date, which shows the mala fide intentions of the authority, and which makes it necessary that the original be perused as what sort of comment have been kept hidden.

That there has no inquiry of any sort has ever been conducted neither the appellants have been given any chance of defence, which the law never approves of.

That the appellants have not conducted any act of commission or omission which may constitute any offence under any law. Moreover the appellants are still serving as KPOs and drawing their salaries from the same head as well with the approval of the competent authority.

It is, therefore, very humbly prayed that on acceptance of this appeal the order impugned may very kindly be set aside and the appellants let to continue their duties as KPOs without any break or illegal interference.

Yours Obediently
 24/02/14
Anjad Ali C.O.
 24/2/14
Said Ghani C.O.
 24/2/14
Abdul Khaliq C.O.
 24/2/14
A. Chohan C.O.

Attested

Advocate

OF THE DISTRICT EDUCATION OFFICER MALE SWAT.

Date Gulkada the 11/21 /2014.

19

1. Mr, Said Ghani Local Office.
2. Mr, Abdul Khaliq Local Office.
3. Mr, Shahzad Local Office.

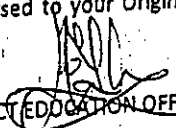
Subject:-

NOTICE.

Memo:-

It is stated for your kind information that you were adjusted as computer operators by Mr, Gul Zaman Khan, the then DEO Male Swat without observing codal formalities and subsequently, he cancelled the same order vide No.11192-98 dated 12.6.2013 with the directions to recover the overpayment made to you during the period. It is further reflected that you are still drawing your salaries on the posts of computer operators irregularly which led the Govt treasury towards a heavy loss.


You are directed to provide your individual comments in written form alongwith proofs and other allied materials if any in defence of your current service position to the undersigned within 5 (Five) days of the receipt of this notice, otherwise you shall be reversed to your Original Junior clerk posts with recovery and other Departmental proceedings.

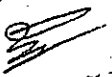

DISTRICT EDUCATION OFFICER
MALE SWAT.

Endst:No. _____

Copy forwarded for information to the:-

1. Director Elementary and Secondary Education KPK at Peshawar.
2. District Accounts Office swat at Saidu Sharif.
3. Deputy District Education Officer Local Office.
3. Budget & Accounts Officer Local Office.
4. PA to DEO Local Office.


DISTRICT EDUCATION OFFICER
MALE SWAT.

Attested

Advocate

1. No. of order or proceedings	2. Date of Order or proceedings.	3. Order or other proceedings with signature of Judge or Magistrate and that of parties where necessary.
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04.03.2015

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
CAMP COURSE SWAT**

Appeal No. 806/2014

(Said Ghent vs Govt of KP through Secretary Education etc.)

JUDGMENT

MUHAMMAD AZIM KHAN AFRIQI, CHAIRMAN: Appellant with counsel and Mr. Muhammad Saeed, Subject Specialist alongwith Mian Amir Qadir, G.P for respondents present.

This order is aimed at disposal of Instant appeal No. 806 of 2014 as well as Appeals No. 807, 808 and 809 of 2014 as all the appeals are identical in nature and revolve against the same controversy.

Amended appeals in all the afore-stated service appeals have been submitted. Preliminary arguments heard and record perused.

Brief facts of the afore-stated appeals are that the appellants were initially appointed as Junior Clerks and being computer literate directed to work as Assistant Programmer/KPOs and were later on adjusted in BPS-12 in the office of the District Education Officer, Swat. Vide Impugned order dated 12.6.2013 the appellants were relieved of the posts against which they were adjusted and were directed to work on the posts against which they were appointed. It was also directed that all kinds of extra and over financial advantages received by the appellants be recovered from them. Against the said order departmental appeals were preferred on 24.2.2014 which were not responded and hence the service appeals on 9.6.2014.



20

C.F.W.

Signature

ATTESTED
Khyber Pakhtunkhwa Service Tribunal
Peshawar

Attested
Advocate

Attested
Advocate

(31)

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21

Perusal of record would suggest that none of the appellants were promoted in the prescribed manners against the posts of KPOs. It was admitted that the cases of the appellants were neither processed by the selection authority including the Departmental Selection Committee nor were so promoted and mere allowed/directed to work against the said posts which directions cannot be considered as promotions of the appellants against the said posts. Learned counsel for the appellants also failed to show that such posts were meant for promotion and that the appellants were eligible to be considered for promotion against the said posts and were so considered by the competent authority.

In view of the above, there is no substance in the appeals as such the same are dismissed in limine.

Before parting with this judgment, it is observed that the appellants shall not be considered debarred on the strength of the judgment of this Tribunal from applying to the competent authority for consideration of their due rights including right to promotion, financial benefits and recovery of the stated overpayments, if so advised.

Sd/- Mulla Asad Ali Khan
Chairman
Comp. Court Sec.

ANNOUNCED
04.03.2015

Certified to be true copy
EX. AT / 11/2015
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Date of Application: 11-3-2015
N
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8
Date: 11-3-2015
Date: 11-3-2015

Attested
[Signature]
Advocate

To

Director,
Elementary & Secondary Education,
Khyber Pakhtunkhwa Peshawar.

Annexure *CE D*

22
DEO Swat
ADP
for detail comments

Subject: - RECONSIDERATION APPEAL.
Sir

Most respectfully, we the appellants submit the following few lines for your kind and sympathetic consideration in the light of the judgment of the Khyber Pakhtunkhwa Service Tribunal dated 11/03/2015 which states that " Before parting with the judgment it is observed that the appellants shall not be considered debarred on the strength of this Tribunal from applying to the competent authority for consideration of their due rights including right to promotion, financial benefits and recovery of the stated overpayment if so advised." Copy of the judgment is attached as (Annexure A).

*Director
Elementary & Seco
Khyber Pakhtun*

In this connection the appellants request as under:-

1. That the first appointment of the appellants were made on the post of Junior Clerks who were finally posted in the Office of the then Executive District Officer E & SE Swat and were assigned the job of EMIS and other computer related program.
2. That the appellants possessing the relevant and prescribed Professional qualification such B.S (computer Science) and Information technology (DIT) for the post of Key Punch Operator. Entries of the professional and Academic Qualification are appearing on the 2nd page of the service books of the appellants attached as (Annexure B).
3. That the then Executive District Officer E& SE keeping in view Academic, qualification, experience and fitness for the post, posted the appellant as KPO/Data Entry Operators in the EMIS cell of the Education Department vide Order No:344-48 dated 18/7/2001 . Copy the Order is attached as (Annexure C).
4. That in compliance of the order referred to Paragraph above the appellant submitted charge report duly signed by the then Executive District Officer E & SE Swat and copy of the same was sent to all concerned. Copy of the charge report is attached as (Annexure D).
5. That in the year 2007 I was assigned the task of Assistant Programmer in EMIS section of the local Office vide Order No: 2176-79 dated 13/2/2007. Copy of the order is attached as (Annexure E).
6. That vide order No: 3923-28 dated 4/12/2008 copy attached as (Annexure F), the appellants were allowed computer allowance at the rate of Rs: 750/- as allowed to all the KPOs of the province under the Rules by the Government of Khyber Pakhtunkhwa.
7. That on the eve of bifurcation of Male and Female Offices in the year 2013 we were acknowledged as regular KPOs and posted accordingly in the Office of the District Education

Attested
Advocate

Officer M & F) vide order signed by both the District Education officer M & F copy attached as (Annexure G).

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8. That the District Education Officer Male Swat vide Order copy attached as Annexure H posted the appellants as regular computer operators in BPS-12 with proper direction that entries to that effect shall be made in our service books.
9. That directed above entry had been made in the service books of the appellants concerned in the relevant page of the service books. Copy of the service books attached vide Para 2 above.
10. That the names of the appellants have been included as Regular Computer Operators in the provincial seniority list of the KPOs of Khyber Pakhtunkhwa at S.No. 4, 23 and 45. The inclusion of names of the appellants in the Provincial seniority list proves that the E & SE Department Khyber Pakhtunkhwa have acknowledged the appellants as regular KPOs at provincial level. Copy of the Provincial list is attached as (Annexure I).
11. That all of a sudden and without any prior notice the posting order as computer Operator of the appellants was withdrawn vide Order No: 11192-98 dated 12/6/2013 on a flimsy ground that codal formalities were not observed and the appellants were asked vide notice No 3575-77 dated 11/2/2014 to recover the over payment made to the appellants during the period. In this connection it is stated that non-observance of codal formalities was the fault of the appointing authority and as such the appellants may not be scapegoated for the fault of others. Copy of the notice is attached as (Annexure J).
12. That the appellants suspended the Impugned order in Peshawar High Court Mingora Bench vide order sheet dated 14/2/2014 copy attached as (Annexure K). It merits mention that the appellants also filed appeal in the Khyber Pakhtunkhwa Service Tribunal which was unfortunately decided against the appellants vide judgment dated 11/03/2015 referred to Annexure A. In the said judgment passed by the Khyber Pakhtunkhwa Service Tribunal the appellants were given the right of appeal to the Department. Hence this appeal is submitted. In addition to above the appellants however filed an appeal in the Supreme Court of Pakistan against the judgment of the service Tribunal which is still under process in the Apex Court.
13. That one of the Computer Operator named Mr. Abdul Khaliq was proved guilty in a corruption case was reverted to the post of junior Clerk by the Director E & SE Khyber Pakhtunkhwa order issued under Endorsement No.5013-16 dated 29/10/2015. The last paragraph of the order passed by the Director E&SE is explicit on the subject matter, which read as "Now therefore on consideration of the appeal and in exercise of the powers conferred upon the Appellant Authority under section 17 read with sub Rule 2) (b) of the Khyber Pakhtunkhwa Govt. Servants (Efficiency & Disciplinary) Rules 2011, the order of Major penalty of dismissal from service in r/o Mr. Abdul Khaliq Ex KPO DEO(M) Swat bearing endorsement No, 5313-20 dated 20.6.2015 is set aside and he is reverted to lower scale of BPS-11 as Junior Clerk and re-instated in service on Junior Clerk post at any (Male) high School of District Swat and the intervening period may be

Attested
Advocate

11792

Detail Comments Page No.1

Dated 28/9 /2016

From

The District Education Officer,
(Male & Female) Swat.

To

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

Subject: - DETAIL COMMENTS.
Memo: -

Please refer to your remarks on the original appeal of the following appellants where in you have asked for detail comments from the undersigned on the subject cited above.

S.NO	NAME OF THE APPELLANT	DESIGNATION	PRESENT PLACE OF POSTING
1.	Mr. Said Ghani	Computer Operator	DEO(M) Swat.
2.	Mr. Shahzad	Computer Operator	DEO(M) Swat
3.	Mr. Amjad Ali	Computer Operator	DEO(F) Swat

Para wise comments are as under: -

1. Admitted. The appellants being well conversant and qualified were assigned the job at EMIS cell and other computer related program.
2. True. Page 2 of the service book is explicit on the subject matter. Necessary entries of the academic and Professional qualification have been made in their service books.
3. True. The then District Education Officer. appointed/posted the above mentioned appellants as KPOs vide Order No: 6001-4/Estt/Co. dated 31/1/2013. and Order No.6098-6102 dated 2/2/2013.
4. Admitted. In compliance of the posting order the appellants submitted charge report to all concerned.
5. True. They were assigned the task of the EMIS and other computer related program being well conversant and experienced officials.
6. Being working as Computer Operators they were allowed computer allowance as due and admissible to them under the Rules.
7. Admitted. On the eve of bifurcation as DEO (M & F) they were acknowledged as Computer Operators and both the Male and Female were signatory to the bifurcation list.

Attested

Advocate

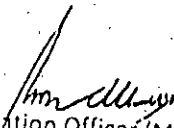
Annexure "H"

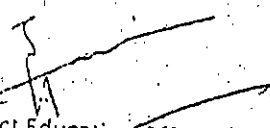
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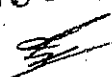
220

- 8-9 Admitted. The appellants were allowed B-12 under proper direction that entries to that effect shall be made in their service books and other allied documents.
10. True. The names of the appellants were placed in the Provincial list of KPOs at S.No 4, 23 and 45.
11. The posting/Appointment order as KPO of the appellants was withdrawn on the grounds that codal formalities for such appointment were not observed. The grounds prescribed for such withdrawal is very poor as observance of the codal formalities were to be completed and finalized by the appointing authority i.e. DEO (Male) Swat and not by the appellants. The appellants were however qualified and well conversant with their job and fulfillment of the formalities was not their responsibility. Hence the reason/ground prescribed for withdrawal does not seem sound and genuine.
12. True. The appellant file writ petition in the Peshawar High Court and got the Impugned order suspended.
13. True. One Mr. Abdul Khaliq who was also appointed as KPO along with the appellants was found involved in a corruption case was dismissed by the DEO (M) Swat and finally reverted as Junior Clerk. The reversion of Mr. Abdul Khaliq from the post of KPO to the post of Junior Clerk by the Directorate proved that they have been acknowledged as KPOs.
14. True. On the eve of up gradation of the posts of KPOs to B-16, the Charge reports and other allied documents of the appellants were signed.

In view of the circumstances above it is recommended that the appeal may be accepted/ considered and they may be reinstated as Computer Operator as the appellants possessing the relevant academic and professional qualification and their termination from such post will create a great set back and the EMIS and other computer related program will come to a standstill position.


District Education Officer (Male)
Swat at GulKada


District Education Officer (Female)
Swat at Spidu Sharif

Attested

Advocate

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

NOTIFICATION

1. WHEREAS, the appellants M/S. Said Ghani, Shahzad and Amjad Ali were initially appointed as Junior Clerks in the Elementary & Secondary Education Department by the then District Education Officer (M) Swat/Divisional Director of Education Malakand Division at Swat.
2. AND WHEREAS, the said Junior Clerks(Appellants) were subsequently posted/adjusted against the post of Computer Operators by the then EDO E&SE / DEO(M) Swat vide office orders No. 3680-85 dated 17-09-2009 and No. 6001-4 dated 31-01-2013 & No. 6098-6102 dated 02-02-2013.
3. AND WHEREAS, later on their posting/adjustment order against the post of computer operators was cancelled by the concerned DEO vide office order No. 11192-98 dated 12-06-2013.
4. AND WHEREAS, the said mentioned computer operators/appellants filed a service appeal No. 809/2014 in the Khyber Pakhtunkhwa, Service Tribunal Peshawar, Camp Court Swat for the redressal of their grievances.
5. AND WHEREAS, the Honorable Judge Khyber Pakhtunkhwa, Service Tribunal Peshawar, Camp Court Swat vide his judgment dated 04-03-2015 directed the appellants to approach to the competent authority for consideration of their due rights etc...
6. AND WHEREAS, consequently the appellant concerned approached to the Director E&SE (Appellate) authority through the DEO (Male/Female) Swat vide letter No. 11792 dated 28-09-2016 requesting for re-instatement against the post of computer operators.
7. AND WHEREAS, the appellate authority in pursuance of Section 17 read with sub rule (1) & (2) of the E&D Rules-2011 called for the comments from the concerned DEO's for consideration of the appeal.
8. AND WHEREAS, the DEO concerned provided the requisite record/comments accordingly vide his letter No. 11792 dated 28.9.2016 & 11793 dated 29.9.2016.
9. AND WHEREAS, having gone through the comments/report and record so provided by the DEO's (Male & Female) Swat in support to the appeal of the aggrieved appellants it was revealed that the posting/adjustment of M/S. Mr. Said Ghani, Shahzad and Amjad Ali (Appellants) against the post of Computer Operators was not found in-line with the prescribed services rules notified by the E&SE Department dated 28-01-2013.
10. NOW, THEREFORE, in exercise of the powers conferred under Section-17 rule (2) (a) of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules-2011, the Director E&SE/appellate authority "uphold the order of DEO (M) Swat issued vide No. 11192-98 dated 12-06-2013" and reject the appeal lodged by M/S Mr. Said Ghani, Shahzad and Amjad Ali Junior Clerks working against Computer Operator posts at office of the DEO (M) Swat (appellants). They should continue against their substantial post as Junior Clerk as usual.

DIRECTOR
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

Encls: No. 139 a 95 /F.No. /A-23/MS/Swat Dated Peshawar the 23/12/2016.

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

- 1- District Education Officer (Male) Swat w/o to his letter No. 11793 dated 28.9.2016.
- 2- District Education Officer (Female) Swat w/o to her letter No. 11793 dated 28.9.2016.
- 3- District Accounts Officer Swat.
- 4- Appellants concerned.
- 5- PA to the Director E&SE Khyber Pakhtunkhwa Peshawar.

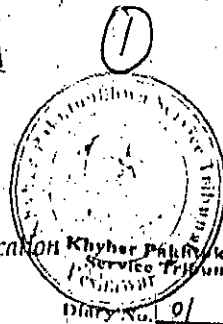
Assistant Director (Admin)
E&SE, Khyber Pakhtunkhwa, Peshawar

Attested
Advocate

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _____ of 2017

Said Ghani Key Punch Operator at District Education Office (Male), Gulkada, District Swat.



Diary No. 01

...Appellant dated 02-01-2017

VERSUS

1. The Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar.
2. The Director Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar.
3. The District Education Officer (Male) at Gulkada, District Swat.
4. The District Accounts Officer District Swat at Saidu Sharif, District Swat.

...Respondents

Filed to-day

Registrar

26
11/2017

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE ORDER OF THE RESPONDENT NO. 2 BEARING NO. 1390-95/F.NO/A-23/MS/SWAT DATED 23-12-2016 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT ALONG WITH OTHERS WAS REJECTED, WHICH ORDER IS AGAINST THE LAW, FACTS AND IS NOT SUSTAINABLE IN LAW.

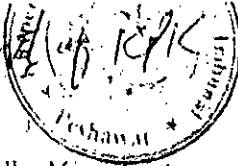
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Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Attested
Advocate

01-17

13.01.2017

Laid Ghani vs Ghani 


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Counsel for the appellant and Addl. AG present. Learned counsel for the appellant argued that the appellant was serving as Computer Operator in the establishment of respondents when vide impugned order dated 12.06.2013 his services as Computer Operator were terminated and all kinds of extra and financial advantages received by the appellant were ordered to be recovered where-against appellant preferred service appeal No. 806/2014 which was dismissed by this Tribunal in limine vide order dated 04.03.2015 with the observation that the appellant is not to be considered debarred from applying to the competent authority for consideration and his rights including right to promotion, financial benefits and against the recovery of above stated over payment. That the application of the appellant was dismissed by the appellate authority vide impugned order dated 23.12.2016 and hence the instant service appeal on 02.01.2017..


That the appellant was appointed in the prescribed manner as Computer Operator and that his name was also reflecting in the final seniority list of the Computer Operators and as such the impugned order is against facts and law and liable to be set aside.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days notices be issued to the respondents. To come up for written reply/comments on 09.03.2017 at camp court Swat as the same pertains to territorial limits of Malakand Division. Till further orders recovery shall not be made from the appellant.

Certified to be true copy


Secretary
Tribunal

Chairman

Attested

Advocate

Sr. No	Date of order/proceedings	Order or other proceedings with signature of Judge or Magistrate
1	2	3
<p align="center">BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL At Camp Court, Swat. Service Appeal No. 05/2017</p> <p>Date of Institution 02.01.2017 Date of Decision 04.03.2020</p> <p>Amjad Ali. Appellant</p> <p align="center">Versus</p> <ol style="list-style-type: none"> The Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar. The Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar. The District Education Officer (Male) at Gulkada, District Swat. District Accounts Officer District Swat at Saidu Sharif, District Swat. <p align="right">Respondents</p> <p>Mr. Muhammad Hamid Mughal ----- Member (J) Mr. Hussain Shah ----- Member (E)</p> <p align="center">JUDGMENT</p> <p>MUHAMMAD HAMID MUGHAL, MEMBER: - Appellant</p> <p>with counsel present. Mr. Usman Ghani learned District Attorney present.</p> <ol style="list-style-type: none"> This common judgment in the above captioned service appeal shall also dispose of service appeal bearing No.01/2017 		



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Annexure "K"

04.03.2020

4.3.2020

ATTESTED

Member
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Attested

Advocate

filed by Said Ghani and service appeal bearing No.06/2017 filed by Shehzad, being identical in nature having arisen from the similar facts and circumstances.

3. The present service appeals are for setting aside the order dated 12.06.2013 whereby the adjustment/promotion order of the appellants against the post of Key Punch/Computer Operator, made as a result of staff gap arrangement, was cancelled. The appellants have also assailed the order of the appellate authority dated 23.12.2016 whereby departmental appeal of the appellants for their reinstatement against the post of Computer Operator was rejected.

4. Learned counsel for the appellants argued that the appellants were initially appointed as Junior Clerks; that the respondent No.2 asked respondent No.3 to nominate clerks for training in computer operation; that the appellants were as such nominated and adjusted as Computer Operator in the year 2001; that the appellants were placed in the seniority list of Computer Operators; that vide order dated 12.06.2013, the adjustment order of the appellants against the post of Computer Operator was cancelled and feeling aggrieved, the appellants filed Service Appeals before this Tribunal; that this Tribunal while parting with the judgment dated 04.03.2015 passed in the said service appeals, observed that the appellants may approach the competent authority for consideration of their due rights including right to promotion, financial benefits etc.; that consequently the appellants filed departmental appeal

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[Signature]
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Advocate

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however the same was rejected vide impugned order dated 23.12.2016 hence the present service appeal. Further argued that the impugned orders are not sustainable in the eyes of law; that bringing the name of the appellants on the seniority list of Computer Operators confirms the status of appellant as Computer Operator; that in case there was any irregularity in the adjustment of the appellants as Computer Operator, this lapse shall be considered on the part of competent authority and shall not be attributed to the employees. In support of his arguments learned counsel for the appellants referred to the judgment reported in 2018 SCMR page 349.

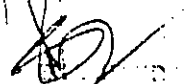
5. As against that learned District Attorney argued that the appellants have not come to this Tribunal with clean hands; that the appellants were appointed against the post of Junior Clerks and their claim to be adjusted against the post of Computer Operator on regular basis is baseless and without any lawful backing; that the appellants had earlier challenged the impugned order dated 12.06.2013 before Service Tribunal in service appeals which service appeals were dismissed by this Tribunal in limine vide common judgment dated 04.03.2015. Further argued that since the matter in issue has already been decided, therefore, the present service appeals are not maintainable being barred under Rule-23 of Khyber Pakhtunkhwa Service Tribunal Rules, 1974.


6. Arguments heard. File Perused.

7. It is not disputed that the appellants earlier challenged the

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ATTESTED


 Khyber Pakhtunkhwa Service Tribunal
 Peshawar

Attested

 Advocate

impugned order dated 12.06.2013 before this Tribunal in service appeals and this Tribunal vide common judgment dated 04.03.2015 passed in Service Appeals No. 806/2014, 807/2014, 808/2014 and 809/2014 dismissed the same. Findings in the said common judgment are reproduced as under:

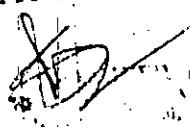
"Perusal of record would suggest that none of the appellants were promoted in the prescribed manners against the posts of KPOs. It was admitted that the cases of the appellants were neither processed by the selection authority including Departmental Selection Committee nor were so promoted and mere allowed/directed to work against the said posts which directions cannot be considered as promotions of the appellants against the said posts. Learned counsel for the appellants also failed to show that such posts were meant for promotion and that the appellants were eligible to be considered for promotion against the said posts and were so considered by the competent authority.

In view of the above, there is no substance in the appeals as such the same are dismissed in limine.

Before parting with this judgment, it is observed that the appellants shall not be considered debarred on the strength of the judgment of this Tribunal from applying to the competent authority for consideration of their


4.3.2016

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Attested

Advocate

due rights including right to promotion, financial benefits and recovery of the stated overpayments, if so advised."

8. Consequent upon the common judgment/order dated 04.03.2015 of this Tribunal, the appellants again submitted departmental appeal (reconsideration appeal), which departmental appeal was rejected vide impugned order dated 23.12.2016 on the ground that posting/adjustment of the appellants against the post of Computer Operator was not found in line with the prescribed service rules and therefore the appellants should continue against their substantial post as Junior Clerk as usual.

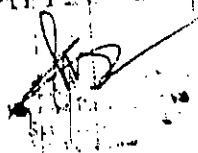
9. This Tribunal is of the considered view that the matter in issue in the present service appeals has already been decided vide common judgment dated 04.03.2015 of this Tribunal passed in service appeals No. 806/2014, 807/2014, 808/2014 and 809/2014. Above mentioned service appeals were dismissed by this Tribunal on the basis of findings that none of the appellants was promoted in the prescribed manner against the posts of KPOs and that their cases were not processed by the selection authority/departmental selection committee nor were so promoted and mere permission/direction to work against the post of KPO cannot be considered as promotions of the appellants against the said posts and that learned counsel for the appellants failed to show that such posts were meant for promotion and that the appellants were eligible to be considered for promotion against the said posts and


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4.3.2015

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Advocate


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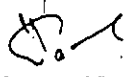
were so considered by the competent authority.

10. The observation in the last para of the common judgment dated 04.03.2015 cannot be stretched for the grant of right of appointment or promotion against the post of KPO/Computer Operator.

11. As a sequel to above the captioned service appeal and the connected service appeals as mentioned in Para-02 of this judgment, are dismissed. Parties are left to bear their own costs.

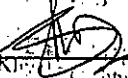
File be consigned to the record room.



(Hussain Shah)
Member



(Muhammad Hamid Mughal)
Member
Camp Court, Swat.

ANNOUNCED.
04.03.2020

Certified to be true copy


Khatun
Secretary
Camp Court
Swat

Attested

Advocate

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OFFICE OF THE DEPUTY DIRECTOR (F&A), DIRECTORATE OF
E&SE, PESHAWAR

36

Subject INQUIRY REGARDING APPEAL RECEIVED FROM AMJAD ALI & OTHERS WORKING AS
COMPUTER OPERATOR IN DEO (F) SWAT

Background of the case:-

An appeal received by worthy Director E&SE, Peshawar from Mr. Amjad Ali Mr. Shahzad Khan and Mr. Said Ghani who are working against the post of computer operators in DEO (M/F) Swat.

According to them, they were initially appointed as junior clerks, later on the Executive District Education Officer Swat posted/adjusted them against the post of computer operator/Data Entry Operator BPS-12.

Amjad Ali was adjusted/posted as KPO on 17-9-2009, Said Ghani was adjusted/posted as KPO on 18-7-2011 while Shahzad was adjusted/ posted 27-7-2006.

They also stated in their appeal that they have prescribed qualification of computer operator, also got training & seminar regarding Computer operator in 2013, sudden & without any notice, the Executive District Education Officer cancelled our office order of computer operator with the remarks that it was just for stop gap arrangement.

The applicant requesting for re-instatement against the post of computer operator.

The worthy Director, constituted an inquiry of the following officers to investigate the facts.

1. Mr. Adalat Khan, Dy: Director (F&A) Local Directorate as a Chairman.
2. Mr. Gulzar Muhammad, Assistant Director (Lit) Local Directorate as a member

Fact & Finding.

Mr. Adalat Khan, Dy: Director (F&A) Local Directorate along with Mr. Gulzar Muhammad, Assistant Director (Lit), Local Directorate visited the DEO (M&F) Swat offices & checked the whole records/orders & documents.

Attested

Advocate

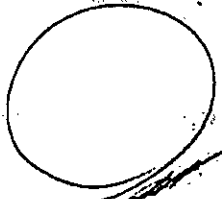
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We found that the applicants are basically appointed as Junior Clerks & posted against the post of computer operator/Data Entry Operator by the concerned Executive District Education Officer, which is wrong & against the law/rules & policy, because cadre of post cannot be changed.


There is no such rules to change the cadre of an employee on district level on need basis for some time. They can work on said posts but cannot be merged in it.

Recommendations

1. The case of the applicants is subjudice / under trial in the August Supreme Court of Pakistan so the mentioned recommendation may be implemented after the outcome of the CPLA filed by the applicants.
2. Their names should be included in the seniority list of J/Clerk from the 1st appointment.
3. They may be promoted in their own cadre.
4. They may be promoted in their own cadre to the posts as their other colleagues/person got promotion.



Gulzar Muhammad
Assistant Director Lit
Local Directorate



Adalat Khan
Deputy Directorate (F&A)
Local Directorate

Attested

Advocate



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR.

No. 977 /F.No.A-23/MS/Appeal/Amjid Ali/Comp/Oper & others Swat
Dated Peshawar the 33/3/2022

Phone: 091-9225344

Email: ddadmncse@gmail.com

(37)

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Handwritten: DEO 96/9/2022

The District Education Officer
(Female) Swat

Handwritten: 6/9/22

Subject: MERCY PETITION REGARDING RE-INSTATMENT AS COMPUTER OPERATOR BPS-16

Memo:-

I am directed to refer to the subject cited above and to state that an inquiry has been conducted by this Directorate in the light of appeal in r/o Mr. Amjid Ali, Mr. Shahzad Khan and Mr. Saad Ghani working against the post of Computer Operators at DEO (Male/Female) Swat.

I am further directed to ask you to implement the recommendation of the inquiry officer will be implemented after the outcome of CPLA Please.

Signature
Assistant Director (Admn)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst: No. _____

Copy to the:-

1. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Applicant concerned.
3. Master File.

Attested
Signature
Advocate

Assistant Director (Admn)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

IN THE SUPREME COURT OF PAKISTAN
(Appellate Jurisdiction)

PRESENT:
MR. JUSTICE IJAZ UL AHSAN
MR. JUSTICE AMIN-UD-DIN KHAN
MR. JUSTICE JAMAL KHAN MANDOKHAIL

C.Ps. No. 2185, 2186 & 2245 OF 2020
(Against the judgments dated 04.03.2020
passed by KPK Service Tribunal in Service
Appeal No. 01, 05 & 06 of 2017)

Sardar Ghani
(C.P. No. 2185 of 2020)
Shehzad
(C.P. No. 2186 of 2020)
Amjad Ali
(C.P. No. 2245 of 2020)

....Petitioners

Versus

The Government of Khyber Pakhtunkhwa
through Secretary Elementary & Secondary
Education, Khyber Pakhtunkhwa, Peshawar
and others

....Respondents

For the petitioners: Mr. Amjad Ali (Mardan), ASC.
For the respondents: Sardar Ali Raza, Addl. A.G. KPK.
Fazal Rehman, DEO (M) Swat.
Muhammad Jamil, AAO District Swat.
Date of Hearing: 27.04.2023

ORDER

IJAZ UL AHSAN, J.: After arguing the case at some length, learned counsel for the petitioners does not press this petition. He, however, submits that the department is recovering the benefits which were lawfully given to the petitioners while they were performing functions as Key Punch Operators/Computer Operators. He further submits that on being sent to their respective posts they are entitled to promotion in accordance with law by following the relevant departmental rules. Learned Additional A.G. submits that the promotions in accordance with law and departmental rules will be considered by the competent authority and such process will be completed within three months. As far as recovery of all dues are

ATTESTED

Senior Court Associate
Supreme Court of Pakistan
Islamabad

Attested
Advocate

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2185 of 2020 etc

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concerned, on the principle of locus poenitentiae, in view of the fact that petitioners have already received benefits and such benefits were granted to them by the Government itself without any fault or effort on the part of the respondents to obtain such benefits unlawfully, we are inclined to agree with the argument of learned counsel for the petitioners that such benefits cannot at this stage be recovered from the petitioners. Subject to the above observations, these petitions are disposed of as not pressed.

Sd/-J
Sd/-J
Sd/-J

Certified to be True Copy

Senior Court Associate
Supreme Court of Pakistan
Islamabad

Islamabad, the
27th April, 2023
(Umair)

294/2023

Cr No: _____ Civil/Criminal

Date of Presentation: 27-4-2023

No of Words: 10

No of Pages: 1

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Copy Fee In: 100

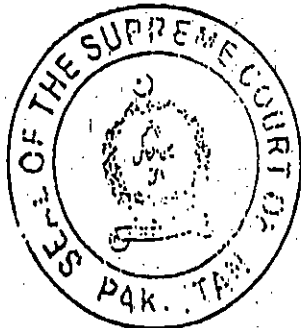
Court Fee Stamps: 100

Date of Completion of Copy: 27/4/23

Date of Delivery of Copy: _____

Compared by/Prepared by: 27/4/23

Received by: _____



Attested
Advocate



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NOTIFICATION.

Consequent upon the recommendation of the Departmental Promotion Committee (DPC) in its meeting held on 18-08-2023 and in the light of the judgment of August Supreme Court C.P No. 2185, 2186 dated 2245 of 2020 dated 27-04-2023, the following Junior Clerks (BS-11) working in and under the Directorate of E&SE Khyber Pakhtunkhwa Peshawar are hereby promoted to the posts of Senior Clerk (BS-14) on regular basis and posted/adjusted against the vacant post of Senior Clerk (BS-14) in the offices/institutions as noted against each in the interest of public service with effect from the charge assumption of the newly promotes.

S.No	Name	Father Name	Present Station	Proposed Station	Remarks
1	Amjad Ali	Purdil Khan	DEO (F) Swat	GGHSS Zara khela Swat	AVP
2	Said Ghani	Saud Faqir	DEO (M) Swat	GHSS Shagai Swat	AVP
3	Shehzad	Fazli Manan	DEO (M) Swat.	DEO (M) Swat	AVP

Note:-

1. Charge report should be submitted to all concerned.
2. All the DEOs (M/F) Concerned are directed to handover charge to newly promotees S/Clerks in station mentioned against each, if the said post is filled by your office, the same may be vacated for newly promoted persons.

DIRECTOR
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar.

5283-86

Endst: No. F.No./Promtion of J/C to SC/Swat

Dated Peshawar the 13/9/2023

Copy forwarded to the: -

1. Registrar Supreme Court of Pakistan, Constitution Avenue G-5/2 Islamabad
2. District Education Officers (M/F) Concerned
3. District Account Officer Concerned
4. Principal/Headmistress Concerned.
5. Officials concerned.
6. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
7. Master File

13/9/23
Assistant Director (ADMN)
Directorate E& Secondary Education
Khyber Pakhtunkhwa, Peshawar

Attested

Advocate



OFFICE OF THE
DISTRICT EDUCATION OFFICER (MALE) SWAT

Annexure-01

42

NO. 9271

Dated: 4/10 /2023

To

The Director
Elementary & Secondary Education
Khyber Pakhtun Khwa Peshawar

Subject: - APPEAL FOR MODIFICATION IN PROMOTION ORDER
ISSUED VIDE NO.5283-86/F.NO. PROMOTION OF J/C TO S/C
DATED; 13-09-2023, WITH BACK BENEFITS.

Memo:-

I have the honor to enclose herewith original appeals in respect of the following officials. The contents of the appeal are self-explanatory, for your kind perusal and favorable consideration please.

01. Said Ghani Senior Clerk
02. Shahzad Senior Clerk

DISTRICT EDUCATION OFFICER
(MALE) SWAT

Attested
Advocate

Mr Rasool Khan 80
25/9/23

To, The Director
Elementary & Secondary Education
Khyber Pakhtun Khwa Peshawar.

Through Proper Channel

Subject APPEAL FOR MODIFICATION/REVIEW IN PROMOTION ORDER ISSUED VIDE NO: 5283-86
F.No/ PROMOTION OF J/CLERK TO S/CLERK DATED: 13-09-2023 TO THE EXTENT THAT:

43

- i. The Appellant may be promoted w.e.f retrospective date (30-5-2017) as other colleagues were promoted with all Consequential back benefits (Promotion order attached as Annexure-H)
- ii. The name of the appellant may be put in seniority list of Senior Clerks at S.No.297 before S.No.296 as both, the appellant and S.No.296 were appointed on the same date i.e 26-5-1991.

Respected Sir,

Facts:

- 01 That the appellant was appointed as Junior Clerk in Elementary & Secondary Education Department vide order No.1186-91 dated: 26-5-1991. (Copy attached as Annexure-A)
- 02 That the appellant was working under the control of the high-ups' with great zeal and zest till 2-02-2013 and thereafter the appellant was posted to the post of Computer Operator BPS 12 Vide DEO (M) office order No.6098-6103 dated 2-2-2013. (Copy attached as Annexure-B)
- 03 That the said promotion order was withdrawn by DEO (M) Swat vide office order No.1192-9 dated; 12-06-2013. (Copy attached as Annexure C)
- 04 That the present appellant challenged the above withdrawn order dated 12-06-2013 before the Honorable Khyber Pakhtun Khwa Service Tribunal.
- 05 That the Honorable Service Tribunal dismissed the service appeal of the appellant vide judgment dated 04-03-2020.
- 06 That the appellant filed CPLA/CP NO:2185 of 2020 before the apex Court against the order dated; 04-03-2020 of the KP Service Tribunal.
- 07 That during the pendency of CPLA, the appellant filed appeal and the worthy Director E&S Education Khyber Pakhtunkhwa constituted an Inquiry committee. The inquiry committee submitted their recommendations as under:- (Copy attached as Annexure-D)
 - I. *"The Case of the applicants is subjudice/under trail in the August Supreme Court of Pakistan so the mentioned recommendation may be implemented after the outcome of the CPLA filed by the applicants.*
 - II. *Their names should be included in the seniority list of Junior Clerks from the 1st appointment.*
 - III. *They may be promoted in their own cadre.*
 - IV. *They may be promoted in their own cadre to the posts as their others colleague/Person got promotion."*
- 08 That the worthy Director E & S Education Khyber Pakhtunkhwa vide letter No.927 dated 23-08-2022, agreed that the Recommendation of the Inquiry committee will be implemented after the outcome of CPLA. (Copy attached as Annexure-E).
- 09 That the worthy apex court vide judgment dated 27-04-2023 disposed of the CPLA with the direction that the petitioners are entitled to promotion in accordance with the Law on being sent to their respective posts within 03 months and further directed that no recovery should be made from them.

648
25/9/23

Attested
Advocate

10

That now your good self-office has issued promotion order/Impugned order of the appellants to the post of senior clerks vide order No. NO.5283-86 / F.No/PROMOTION OF J/C TO S/C DATED; 13-09-2023 w.e.f date of taking over charge on new post/Senior Clerk. (Annexure-F)

11

That the order Issued by the Department has been obeyed and the appellant has taken charge of the post of Senior Clerk accordingly.

12

It is Pertinent to mention that the appellant has received salary in B-12 as Computer Operator w.e.f 2-2-2013 to 30-06-2016, and has not received the salary of B-16 of Computer Operator w.e.f 01-07-2016 when the post of computer operator was up-graded to B-16 for which the appellant was entitled. (Pay slip attached as Annex-G)

13

That the above impugned order is illegal, against the spirit of the Judgment of the Honorable Supreme Court and is liable to be modified to the extent that the appellant may be given seniority as per other colleagues w.e.f retrospective date and he may be put in seniority list as per 1st appointment order with all consequential back benefits inter alia following ground.

Ground.

- A. That the impugned order dated 13-09-2023 is liable to be modified as per recommendations of the inquiry committee and within the meaning of the Supreme Court Judgment.
- B. That the appellant had challenged the withdrawal of posting order from J/C to Computer Operator before the Service Tribunal and Supreme Court and both the honorable Courts did not accept the plea of the appellant, hence it clearly means that the original appointment order as J/Clerk is intact and the appellant is entitled to the benefits i.e. Seniority as per their other colleagues.
- C. That the promotion order/impugned order is against the spirit of natural justice as other colleagues of the same batch of appellant have been promoted to the post of Senior Clerk few years ago, therefore the present appellant is also entitled to be promoted from the date when their other colleagues were promoted i.e retrospective date (30-5-2017) (Annexure-H at S.No.189)

It is, therefore very humbly requested that the impugned promotion order dated 13-09-2023 of the appellant may be modified and the appellant may be awarded promotion w.e.f the date (30-5-2017) when the other colleagues of appellant's same batch were promoted (Annexure-H at S.No.189 promotion order) and it is further prayed that the appellant may be awarded seniority as per the other colleagues of the same batch i.e from retrospective dates (Annex-I at S.No.297 Seniority list of S/Clerks) with all consequential back benefits as the appellant is entitled please.

Appellant

(SAID GHANI)

Senior Clerk O/O DEO (M) swat
Cell No: 03339464663

Attested
Advocate



DISTRICT EDUCATION OFFICER (MALE)

Swat (Cell # 0946 9240209-228)

No. 7011-15 / Dated 24/7 / 2024

To,

1. Mr. Shaluzad S/Clerk local office.
2. Mr. Saif Ghani S/Clerk local office.

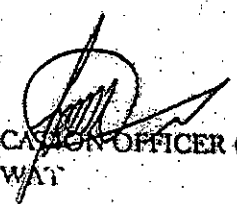
Annexure P

WS

Subject: APPEAL FOR SENIORITY FROM THE DATE AS OTHER COLLEAGUES OF THE SAME BATCH WITH BACK BENEFITS.

Memo:

With reference letter of the Director E&S Education Khyber Pakhtunkhwa vide letter No.5629/F.No./A-23/MS/Appeal/Amjad Ali & other C/Operators Swat dated 16-01-2024 regarding the above subject, your appeal has been rejected by the appellate authority, as per attached letter for your information accordingly.


DISTRICT EDUCATION OFFICER (M)
SWAT

Encls: No. _____

Copy of the above is forwarded to:

1. The Director E&S Education Khyber Pakhtunkhwa w/r to his letter No. & date cited above.


DISTRICT EDUCATION OFFICER (M)
SWAT

Attested
3
Advocate



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR.
No. 5629 /F.No./A-23/MS/Appeal/Amjad Ali & other C/Operator Swat
Dated Peshawar the 16 / 01 /2024
Phone: 091-9225344 Email: ddadmn.ese@gmail.com

Wb

To
District Education officer
(Male) Swat

Handwritten signature and date
16/01/24

Subject: APPEAL FOR SENIORITY FROM THE DATED AS OTHER COLLEAGUES OF THE SAME BATCH WITH BACK BENEFITS.

Memo:

I am directed to the subject cited above and to enclose herewith with a copy of letter No SO (P-M)E&SED/2-6/DPC Meeting/Mr.Said Ghani & others/Senior Clerk/Swat/2023 dated 27-12-2023 alongwith its enclosures in respect of Mr. Said Ghani S/Clerk office of DEO (M) Swat received from Section Officer (P-Male) Govt. of Khyber Pakhtunkhwa E&SED Peshawar and to state that his appeal has been examined/analyzed by this office and **once again rejected** by the appellate authority, hence inform the concerned S/clerk accordingly.

Handwritten signature and date
16/01/24
Assistant Director (Admn)
Directorate E& Secondary Education
Khyber Pakhtunkhwa, Peshawar

Endst; No. _____
Copy forwarded to the: -

1. Section Officer (P-Male) Govt. of Khyber Pakhtunkhwa E&SED Peshawar w/r to his letter No. SO (P-M)E&SED/2-6/DPC Meeting/Mr.Said Ghani & others/Senior Clerk/Swat/2023 dated 27-12-2023
2. Mr. Said Ghani S/Clerk office of DEO (M) Swat
3. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
4. Master File.

Assistant Director (Admn)
Directorate E& Secondary Education
Khyber Pakhtunkhwa, Peshawar

D:\Admn\Irshad Ali\MS\Appeal Rejected\said ghani appeal rejected 2024.doc

Attested
Handwritten signature
Advocate

4318
23/1/24

Monthly Salary Statement (August-2023)

Personal Information of Mr. MR SAID GHANI d/w/s. of SAID FAQIR
 Personnel Number: 00070756 CNIC: 1560284130139
 Date of Birth: 13.04.1969 Entry into Govt. Service: 28.05.1991

Computer Operator

NTN: _____
 Length of Service: 32 Years 03 Months 005 Days

Employment Category: Active Temporary

Annexure Q

47

Designation: COMPUTER OPERATOR 80004927-DISTRICT GOVERNMENT KHYBE

DDO Code: SW6349-District Education Officer (Male) Swat

Payroll Section: 001

GPF Section: 001

Cash Center: 08

GPF A/C No: EDUSW011862

GPF Interest applied

GPF Balance:

355,955.00 (provisional)

Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2022

Pay Scale Type: Civil

BPS: 12

Pay Stage: 26

Wage type	Amount	Wage type	Amount
0001 Basic Pay	56,950.00	1001 House Rent Allowance 45%	2,940.00
1210 Convey Allowance 2005	2,856.00	1300 Medical Allowance	1,500.00
1500 Computer Allowance	750.00	1911 Compen Allow 20% (1-15)	1,000.00
2148 15% Adhoc Relief All-2013	800.00	2199 Adhoc Relief Allow @10%	535.00
2315 Special Allowance 2021	3,500.00	2341 Dispr. Red All 15% 2022KP	5,598.00
2347 Adhoc Rel Al 15% 22(PS17)	5,598.00	2378 Adhoc Relief All 2023 35%	19,932.00

Deductions - General

Wage type	Amount	Wage type	Amount
3012 GPF Subscription	-3,300.00	3501 Benevolent Fund	-1,200.00
3534 R. Ben & Death Comp Fresh	-600.00	3609 Income Tax	-1,495.00
3990 Emp.Edu. Fund KPK	-135.00		0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 17,939.00 Recovered till AUG-2023: 2,990.00 Exempted: 0.10- Recoverable: 14,949.10

Gross Pay (Rs.): 101,959.00 Deductions: (Rs.): -6,730.00 Net Pay: (Rs.): 95,229.00

Payee Name: MR SAID GHANI

Account Number: PLS 4729-61

Bank Details: NATIONAL BANK OF PAKISTAN, 231330 N.B.P. SAIDU SHARIF SWAT N.B.P. SAIDU SHARIF SWAT, SWAT

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address: VILL SHAGAI P.O. SAIDUSHARIF TEH BABOZAI

City: SWAT


Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email: emisswat@gmail.com

Attested

 Advocate

Dist. Govt. NWFP-Provincial
District Accounts Office-SWAT
Monthly Salary Statement (February-2024)



Personal Information of Mr. MR SAID GHANI, d/w/s of SAID FAQIR
Personnel Number: 00070756 CNIC: 1560284130139
Date of Birth: 13.04.1969 Entry into Govt. Service: 28.05.1991

NTN:
Length of Service: 32 Years 09 Months 003 Days

Employment Category: Active Temporary

Designation: STENOGRAPHER 80004927-DISTRICT GOVERNMENT KHYBE

DDO Code: SW6349-District Education Officer (Male) Swat

Payroll Section: 001 GPF Section: 001 Cash Center: 08

GPF A/C No: EDUSW011862 Interest Applied: Yes GPF Balance: 136,075.00

Vendor Number: -

Pay and Allowances: Pay scale: BPS For - 2022 Pay Scale Type: Civil BPS: 14 Pay Stage: 22

Wage type	Amount	Wage type	Amount
0001 Basic Pay	60,810.00	1001 House Rent Allowance 45%	3,321.00
1210 Convey Allowance 2005	2,856.00	1300 Medical Allowance	1,500.00
1911 Compen Allow 20% (1-15)	1,000.00	2148 15% Adhoc Relief All-2013	800.00
2199 Adhoc Relief Allow @10%	535.00	2315 Special Allowance 2021	3,500.00
2339 Wethear Allowance	9,200.00	2341 Dispr. Red All 15% 2022KP	5,582.00
2347 Adhoc Rel All 15% 22(PS17)	5,582.00	2378 Adhoc Relief All 2023 35%	19,932.00

Deductions - General

Wage type	Amount	Wage type	Amount
3014 GPF Subscription	-3,900.00	3501 Benevolent Fund	-1,200.00
3534 P. Deb & Death Comp Fresh	-600.00	3609 Income Tax	-3,092.00
3990 Emp. Edu. Fund KPK	-135.00		0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	279,000.00	-8,000.00	247,000.00

Deductions - Income Tax

Payable: 27,449.75 Recovered till February-2024: 15,082.00 Exempted: 0.05- Recoverable: 12,367.80

Gross Pay (Rs.): 114,618.00 Deductions: (Rs.): -16,927.00 Net Pay: (Rs.): 97,691.00

Payee Name: MR SAID GHANI

Account Number: PLS 4729-6

Bank Details: NATIONAL BANK OF PAKISTAN, 231330 N.B.P. SAIDU SHARIF SWAT N.B.P. SAIDU SHARIF SWAT, SWAT

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address: VILL SHAGAI P.O. SAIDUSHARIF TEH BABOZAI

City: SWAT Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City: Email:

Attested
Advocate



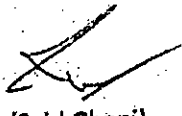
CERTIFICATE OF TRANSFER OF CHARGE

49

1. Certified that we have on the fore / afternoon of this day 13-09-2023 respectively made over and received charge of, Steno Grapher O/O the District Education Officer (M) Swat. Vide Director Elementary & Secondary Education Khyber Pakhtun Khwa Peshawar Notification Endst: No.5283-86/FNo./Promotion of J/C to SC/Swat dated Peshawar the 13-09-2023 and further adjustment order vide DEO (M) Swat office order Endst: No.8177-82 dated: 13-09-2023.
2. Particulars of cash and important secret and confidential document handed over are noted on the reverse:-

Signature of relived: _____
 Government Servant: (Vacant)
 Designation: Steno Grapher

Station: - O/O DEO (M) Swat


Signature of receiving: 
 Government Servant: (Said Ghani)
 Designation: Steno Grapher

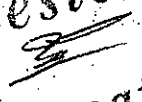
Endst: No. 8237-34

Dated: - 13/9/2023

Forwarded to the:-

- 1- Director E&SE Khyber Pakhtun Khwa Peshawar.
- 2- District Comptroller of Accounts, Swat
- 3- Budget & Accounts Officer, Local Office.
- 4- Official Concerned
- 5- PA to DEO (M) Local Office


 DISTRICT EDUCATION OFFICER,
 MALE SWAT

Attested

 Advocate



OFFICE OF THE DISTRICT EDUCATION OFFICER
MALE SAIDUSHRIF SWAT.
Phone No. 0946-9240228.

50

OFFICE ORDER

Consequent upon the Notification vide Director Elementary & Secondary Education Department Khyber Pakhtunkhwa Peshawar promotion Order No.5283-85 /F.No/Promotion of J/C to SC/Swat dated Peshawar the 13/09/2023, Mr.Said Ghani Senior Clerk B-14 adjusted at GHSS Shagal Swat is further adjusted against the vacant post of Steno Graphier at DEO (M) Swat Office on his own pay & Scale with Immediate effect in the interest of public service.

- Note:- (1) No TA/DA is allowed. |
(2) Charge report should be submitted to all concerned.

(MUHAMMAD RIAZ)
DISTRICT EDUCATION OFFICER (M)
SWAT

Endst: No. 8177-82

Dated: 13/9 /2023.

Copy to:-

1. The Director (E&S) Education Khyber Pakhtunkhwa Peshawar.
2. The District Accounts Officer Saidu Sharif Swat.
3. The DMG/EMA District Swat.
4. The EMIS Branch of local Office Swat.
5. The Budget & Accounts Officer of local office.
6. The official concerned.
7. P.A. to D.E.O.Male Swat.

DISTRICT EDUCATION OFFICER (M)
SWAT

Attested
Advocate

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

NOTIFICATION

Final Seniority List of Senior Clerk (B-14) working in and under Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa, Newly Merged Tribal Districts (NMTD) as stood on 31/12/2022 is hereby approved and notified.

The above Seniority list can be seen/checked on the official website of E&SE Department Khyber Pakhtunkhwa given below:-

www.kpes.gov.pk

DIRECTOR

Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst: No. 2086-2150 / A-23/MS/S: List/ Senior Clerk /2022-23. Dated 24/05 2023
Copy of the above is hereby forwarded to:-

1. All the District Education Officers in Khyber Pakhtunkhwa including Newly Merged Districts
2. PA to Director Elementary & Secondary Education K-Pakhtunkhwa Local Directorate.
3. Master File

[Signature]
Deputy Director (F&A)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Attested
[Signature]
Advocate

52

Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar

Final Seniority List of Senior Clerks DPS-14 under Directorate E&SE, NMD, P&S, DPD, Khyber Pakhtunkhwa corrected upto 31/12/2022.

S.N	Name	Father's Name	Desig	Domicile	Date of Birth	Date of 1st appt as	D/O Prom: as S/Clerk	Present place of posting	Remarks
1	Amin Khan	Dilpazir	S/Clerk	Swat	27/10/1964	07/12/1982	31/05/1993	GHSS Mingora	
2	Zia ud Din	Abdul Rasheed	S/Clerk	Manshra	03/08/1965	25/04/1985	27/12/1997	GHSS Jabbori	
3	Muhammad Yousaf	Juma Khan	S/Clerk	Charsadda	25/04/1964	03/10/1985	31/05/2005	DEO (F) Charsadda.	
4	Ismail Khan	Muhammad Gul	S/Clerk	FATA	14/01/1965	11/03/1986	30/08/2008	D.E (FATA) Peshawar	
5	Inayatullah	Khamash Gul	S/Clerk	FATA	15/12/1965	02/09/1986	30/08/2008	D.E (FATA) Peshawar	
6	Niaz Ahmad	Aurang Zeb	S/Clerk	Nowshera	01/12/1966	07/03/1988	30/03/2009	GGHSS, Shaidu	
7	Sadiq Shah	Mir Akbar Shah	S/Clerk	Mardan	15/04/1965	01/03/1988	23/06/2009	GHSS PALO DHERI	
8	Adalat Khan	Nasr Ullah Khan	S/Clerk	Nowshera	11/04/1970	25/10/1989	24/10/2009	GHSS, Risal Pur	
9	Rooh ullah	Saif ullah	S/Clerk	Peshawar	05/09/1967	16/12/1986	22/12/2009	GGHSS Chumkani	
10	Sardar Hussain	Rahim Shah	S/Clerk		10/03/1967	30/10/1989	07/05/2010	GGHSS RUTSAM	
11	Badal Khan	Haji Mushtari	S/Clerk	Kohistan	05/01/1977	10/01/1996	05/07/2010	GGHS Battaira	
12	Fida Muhammad	Khanwali Dad	S/Clerk	FR Bannu	19/03/1968	01/07/1986	13/01/2012	FATA	
13	Mehar Rahim	Abdur Rahim	S/Clerk	Peshawar	06/04/1967	11/05/1987	13/01/2012	FATA	
14	Mukhtiar Muhammad	Zareen Muhammad	S/Clerk	Swabi	15/02/1967	05/12/1988	29/02/2012	GHS Dogai	
15	Muhammad Daud	Abdur Rauf	S/Clerk		02/03/1967	11/05/1987	22/03/2012	GHSS Dargai	
16	Anjad Ahmad	Rohh ul Qadoos	S/Clerk	Swabi	20/04/1964	18/11/1989	01/09/2012	GGHS Kalabat	
17	Kifayat ullah	Ahmed Khan	S/Clerk	DIK	01/11/1967	25/10/1989	27/12/2012	GHSS No 1 Paharpur	
18	Shah Nawaz	Rab Nawaz	S/Clerk	DIK	20/02/1969	19/01/1991	31/12/2012	GHSS Lar D.I.Khan	
19	Khalil Ahmad	Taj Nawab	S/Clerk	Shangla	01/04/1975	23/11/1994	31/12/2012	GGHSS LILOWNAI	
20	Ifikhar Muhammad	Saqib Shah	S/Clerk	Mardan	06/04/1967	01/10/1989	15/01/2013	GHS Baghicha Dheri	
21	Munir Ullah	Murshad Alam	S/Clerk	Battagram	14/02/1968	12/04/1986	28/05/2014	SDEO (M) Battagram.	
22	Muhammad Naseer	Muhammad Firdous	S/Clerk	Abbottabad	05/03/1964	27/02/1987	28/05/2014	GHSS Lora Abbottabad	
23	Inam Ullah	Muhammad Nawaz Khan	S/Clerk	Dir Lower	01/04/1967		20/05/2016	GHSS: Rabat Dir Lower	

S/Plaza
S/Dir
S/N

Attested
Advocate

53

S.N	Name	Father's Name	Desig	Domicile	Date of Birth	Date of 1st apptt as	D/O Prom: as S/Clerk	Present place of posting	Remarks
96	Sohrab Khan	Muhammad Karam	S/Clerk	Swat	01/04/1970	05/05/1990	20/05/2016	DEO (M) Swat.	
97	Iftikhar Ud Din	Muhammad Shah Khan	S/Clerk	Swat	01/04/1971	05/05/1990	20/05/2016	GGHSS: Charbagh Swat.	
98	Muhammad Shuaib	Shah Tullah Khan	S/Clerk	Swat	01/01/1966	06/05/1990	20/05/2016	GHSS: Labat Swat.	
99	Zahir Shah	Jamshid Khan	S/Clerk	Swat	01/01/1968	06/05/1990	20/05/2016	GHS: Sijbarn Swat	
100	Subhani Shah	Rohani Shah	S/Clerk	Karak	22/08/1971	09/05/1990	20/05/2016	GHSS: Bahadur Khel Karak.	
101	Ali Rahman	Saifur	S/Clerk	Swat	10/04/1969	10/05/1990	20/05/2016	DEO (F) Swat.	
102	Pir Muhammad Khan	Amir Salam Khan	S/Clerk	Swat	08/04/1971	12/05/1990	20/05/2016	GHSS: Kokarat Swat.	
103	Syed Ahmad Rashid	Syed Abdur Rashid	S/Clerk	Swat	10/04/1969	15/05/1990	20/05/2016	GHSS: Charbagh Swat.	
104	Muhammad Khalid Hussain	Gul Muhammad Shah	S/Clerk	Mansehra	12/04/1966	16/05/1990	20/05/2016	SDEO (M) Mansehra.	
105	Nasir Pasha	Muhammad Suliman	S/Clerk	Mansehra	14/03/1970	16/05/1990	20/05/2016	GGHSS: Lassa Nawab Mansehra.	
106	Noor ul Amin	Ali Haider	S/Clerk	Swabi	08/02/1966	31/05/1990	20/05/2016	GHSS: Ayub Khan Killi Mardan	
107	Saleem shah	Shahab Ud Din	S/Clerk	Swat	14/08/1965	01/06/1990	20/05/2016	GHSS: Kishora Swat.	
108	Abdul Hamid Khan	Wali Dad Khan	S/Clerk	Abbottabad	10/02/1970	01/06/1990	20/05/2016	GHSS: Harno Aziz Abad Abbottabad.	
109	Ashfaq Ahmad	Abdur Rehman	S/Clerk	Haripur.	04/04/1972	03/06/1990	20/05/2016	GHS: No.2 Haripur	
110	Muhammad Tahir	M Abdur Rehman	S/Clerk	Mansehra	19/04/1968	06/06/1990	20/05/2016	GGHSS: Thathi Khurd Mansehra.	
111	Sajjad Ahmad	Gharib Ullah	S/Clerk	Charsada	02/10/1969	13/06/1990	20/05/2016	GGHSS: Badrushi NSR.	
112	Muhammad Kamran	Muhammad Suleman	S/Clerk	Haripur.	16/02/1970	18/06/1990	20/05/2016	GHSS: Jatti Pind Haripur	
113	Riasat Hussain Shah	Gul Hussain Shah	S/Clerk	Mansehra	12/05/1971	01/07/1990	20/05/2016	GHSS: Kaghan Mans.	
114	Ghulam Qadir	Fazal Qadir	S/Clerk	Swabi	06/09/1969	30/07/1990	08/11/2016	RITE (F) Swabi	

Attested
Advocate

54

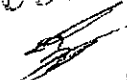
S.N	Name	Father's Name	Desig	Domicile	Date of Birth	Date of 1st appt as	D/O Prom: as S/Clerk	Present place of posting	Remarks
278	Fazal Rahman	Dawood Khan	S/Clerk	Swabi	01/01/1970	09/05/1991	30/05/2017	GGHS Tordher	
279	Azmat Ali Shah	Zain Ul Abideen	S/Clerk	Karak	16/11/1967	11/05/1991	30/05/2017	SDEO(F) T/Nasrati	
280	Asmat Ullah	Muhammad Raees	S/Clerk	Karak	10/02/1970	11/05/1991	30/05/2017	SDEO(F) Karak	
281	Zainul Wahab	Said Wahab	S/Clerk	Swabi	02/01/1965	07/05/1991	30/05/2017	GGHSS Parmoli (Swabi)	
282	Muhammad Ijaz	Malik Aman	S/Clerk	Manshra	02/02/1971	12/05/1991	30/05/2017	GHS Perhanna	
283	Said Muhammad	Sher Muhammad	S/Clerk	Nowshera	10/03/1970	15/05/1991	30/05/2017	GHS Jabba Khushk	
284	Ghulam Sarvar	Karim Jan	S/Clerk	Nowshera	16/08/1967	16/05/1991	30/05/2017	GGHS Chowki Mamrez	
285	Zakir Hussain	Gulzar Khan	S/Clerk	Swabi	01/04/1970	16/05/1991	30/05/2017	GGHS Yaqoobi	
286	Musafar Khan	Abdur Rauf	S/Clerk	Nowshera	01/05/1970	16/05/1991	30/05/2017	SDEO (M) NSR	
287	Alif Zada	Amir Zada	S/Clerk	Nowshera	19/07/1970	16/05/1991	30/05/2017	DEO (M) NSR	
288	Ayub Ur Rehman	Shaisat Khan	S/Clerk				30/05/2017	Disposal of DEO (M) Karak	
289	Abdul Khaleem	Shahib Khan	S/Clerk	Karak	03/03/1966	18/05/1991	30/05/2017	Karak	
290	Jamal Ud Din	Abdur Rahman	S/Clerk	Karak	15/02/1971	19/05/1991	30/05/2017	GGHSS KABAL	
291	Fazli Raziq	Fazli Khaliq	S/Clerk	Swat	28/12/1967	24/11/1987	30/05/2017	GHS Panj Pir	
292	Shujaud Din	Saraf ud Din	S/Clerk	Charsadda	15/02/1969	20/05/1991	30/05/2017	GHS	
293	Abdul Aziz	Abdul Hameed	S/Clerk	Nowshera	07/10/1972	21/05/1991	30/05/2017	DEO(F) NSR	
294	Rahmanullah	Abdur Rashid	S/Clerk	Swat	19/04/1963	27/05/1991	30/05/2017	GHS Manyar	
295	Mir Bashir	Deedar Gul	S/Clerk	Nowshera	03/03/1971	28/05/1991	30/05/2017	GGHS Nowshera Cantt	
296	Tariq Ali	Bakht Rawan	S/Clerk	Swat	02/04/1971	28/05/1991	30/05/2017	SDEO (Male) Swat	
297	Nadir Khan	Azim Gul	S/Clerk	Nowshera	21/09/1969	20/05/1991	30/05/2017	GHS Dagi Banda NSR	
298	Ifrikhar Muhammad	Gul Muhammad	S/Clerk	Mardan	15/02/1969	29/05/1991	30/05/2017	GGHS Par Hori	
299	Muhammad Saeed	Abdul Malik	S/Clerk	Mardan	12/03/1969	29/05/1991	30/05/2017	GHS Kaskoorona	
300	Muhammad Karim Khan	Fateh Khan	S/Clerk	Pesh	10/12/1967	30/05/1991	30/05/2017	GGHSS Badabher	
301	Amir Ali	Umar Wahid	S/Clerk	Mardan	12/01/1968	30/05/1991	30/05/2017	GHS Sher Garh	
302	Iqrar Ahmad	Ali Jan	S/Clerk	Swabi	10/03/1968	01/06/1991	30/05/2017	GGHS Marghuz	
303	Abdul Khaliq	Sain Muhammad	S/Clerk	Manshra	01/05/1969	01/06/1991	30/05/2017	GGHS Ater Shisha	

Said Ghani
 Advocate
 dated 03-06-2019

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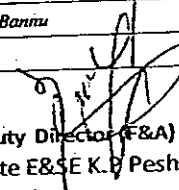
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S.N	Name	Father's Name	Desig	Domicile	Date of Birth	Date of 1st appt as	D/O Prom: as S/Clerk	Present place of posting	Remarks
955	Asghar Jan	Habibullah	S/Clerk	Charsadda	17/05/1972	23/06/1997	15/02/2021	GGHSS harchan	
956	Mazullah Khan	Hidayatullah	S/Clerk	Charsadda	05/10/1972	23/06/1997	15/02/2021	DEO (M) Dir Lower	
957	ILYAS KHAN	ABDUL MALIK	S/Clerk	Pesh	01/10/1966	24/06/1997	15/02/2021	GGHSS Begum Shahbuddin Pesh	
958	Ajmal Khan	Safdar Gul	S/Clerk	Charsadda	01/10/1972	24/06/1997	15/02/2021	RITE Male Mardan	
959	Majid Khan	Zaman Gul	S/Clerk	Mardan	29/04/1973	24/06/1997	15/02/2021	GHSS Fatima Mardan	
960	Mukhtiar Ahmad	Ghafoor Khan	S/Clerk	Mardan	02/01/1974	24/06/1997	15/02/2021	GHSS Kata Khat Mardan	
961	Sajid Nawaz	Muhammad Nawaz	S/Clerk	D/UK	10/03/1974	24/06/1997	04/01/1900	GGHSS Behari Colony DIKhan	
962	Hayat Muhammad	Zarghun Shah	S/Clerk	Mardan	01/04/1974	24/06/1997	15/02/2021	GHS Takhtbhai Mardan	
963	Zar Wali Shah	Shamsu Panah	S/Clerk	Chitral	05/01/1975	24/06/1997	15/02/2021		
964	Nader Shah	Noor Shah	S/Clerk	Charsadda	15/01/1975	24/06/1997	15/02/2021	GGHSS Kotkay Paykhel Dir Lower	
965	Farid Khan	Muhammad Hasan	S/Clerk	Charsadda	01/04/1976	24/06/1997	15/02/2021	DEO (F) Charsadda	
966	Muhammad Naeem	Zainul Abideen	S/Clerk	Charsadda	15/05/1977	24/06/1997	15/02/2021	GHSS Luqman Banda Dir Lower	
967	Waheedur Rahman	Fazli Rahman	S/Clerk	Charsadda	07/08/1977	24/06/1997	15/02/2021	DEO Female Charsadda	
968	Muhammad Abid Riaz	Niaz Ahmed	S/Clerk	D/UK	01/09/1977	24/06/1997	15/02/2021	GGHSS No.2 DI Khan	
969	Akbar Muhammad	Ali Gul	S/Clerk	Dir Lower	15/02/1978	24/06/1997	15/02/2021	GHSS Rabat Dir Lower	
970	Muhammad Farooq	Sahib Jan	S/Clerk	D/UK	13/04/1978	24/06/1997	15/02/2021	GHSS Paind Khan DI Khan	
971	Hakeem Khan	Nasir Khan	S/Clerk	Charsadda	22/04/1970	23/06/1997	15/02/2021	SDEO Male Shabqadar Charsadda	
972	Liaqat Ali	Muhammad Pervaiz	S/Clerk	Swat	01/03/1976	24/06/1997	15/02/2021		
973	Shahid Khan	Fazal Subhan	S/Clerk	Dir Lower	20/01/1971	25/06/1997	15/02/2021	SDEO (M) Timargara Dir Lower	
974	Allaud Din	Muhiud Din	S/Clerk	Dir Lower	25/01/1974	25/06/1997	15/02/2021	GGHSS Rabat Dir Lower	
975	Javed Akhtar	Muhammad Kamal	S/Clerk	Karak	10/03/1974	25/06/1997	15/02/2021	SDEO (F) Karak	
976	Ansar Nazir Khan	Nazir Ahmad	S/Clerk	D/UK	04/01/1975	25/06/1997	15/02/2021	GHSS Daruban DIKhan	

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S.N	Name	Father's Name	Desig	Domicile	Date of Birth	Date of 1st appt.as	D/O Prom: as S/Clerk	Present place of posting	Remarks
1535	Safirullah Khan	Muhammad Aslam Khan	S/Clerk	Bannu	04/04/1978	14/09/2007	11/1/2022	Bannu	
1536	Munirullah Khan	Shams ul Islam	S/Clerk	Bannu	01/12/1979	14/09/2007	11/1/2022	Bannu	
1537	Rifat Ullah	Sher Afzal Khan	S/Clerk	Bannu	07/04/1980	14/09/2007	11/1/2022	Bannu	
1538	Farid ullah Shah	Ghazi Rehman	S/Clerk	Bannu	01/10/1981	14/09/2007	11/1/2022	Bannu	
1539	Naimat Ullah	Hamid Ullah	S/Clerk	Bannu	14/03/1982	14/09/2007	11/1/2022	Bannu	
1540	Hamyoon Khan	Dil Nawaz	S/Clerk	Bannu	05/11/1983	14/09/2007	11/1/2022	Bannu	
1541	Sadullah Khan	Dil Anwar Khan	S/Clerk	Bannu	14/04/1984	14/09/2007	11/1/2022	Bannu	
1542	Muhammad fardouse	Asmat Ali	S/Clerk	Bannu	04/09/1985	14/09/2007	11/1/2022	GGHS No.4 Bannu city	
1543	Shah Mehmood Khan	Inayat Ur Rehman	S/Clerk	Bannu	16/02/1987	14/09/2007	11/1/2022	Bannu	
1544	Abid Ullah Khan	Abdul Gafoor Khan	S/Clerk	Bannu	18/04/1987	14/09/2007	11/1/2022	Bannu	
1545	Safirullah Khan	M Islam khan	S/Clerk	Bannu	25/03/1988	14/09/2007	11/1/2022	GGHS Mandozai Bannu	
1546	Wasim Ullah	Sharif Ullah	S/Clerk	Bannu		14/09/2007	11/1/2022	Bannu	


 Deputy Director (F&A)
 Directorate E&SE K. P. Peshawar

Attested

 Advocate

Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa
Peshawar.

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NOTIFICATION.

Consequent upon the recommendations of Departmental Promotion Committee (DPC) in its meeting held on 24.5.2017, the following Junior Clerks (B-11)/Assistant Store Keepers (B-5)/Lab Assistants (B-7) working in and under the Directorate of E&SE/DC&TE/ FATA/PITE are hereby promoted to the post of Senior Clerks (B-14) on regular basis and posted/adjusted against vacant post of Senior Clerks BPS-14 in the office/school as noted against each in the interest of public service with immediate effect:-

S.#	Sen #	Name/Design	Father's Name	Present place of posting	place of posting as S/Clerk	Remarks
1	4	Imtiaz Ali Lab Asstt	Fazli Qadir	GHSS Pirsaddi Mardan	GHSS Pir Saddi Mardan	Against Vacant post
2	29	Islam Gul J/Clerk	Israr Gul	PITE Peshawar	Directorate PITE Peshawar	Already occupied
3	31	Taj Muhammad J/Clerk	Gul Rab Khan	GHS Zardana SWA	Services placed at the Disposal of DE FATA	
4	40	Izzat Muhammad Lab Asstt	Muhammad Khaliq	GHSS Mazdoor Abad Mardan	GGHSS Takht Bai Mardan	Against Vacant post
5	49	Farid Khan J/Clerk	Rab Nawaz	GHS Said Khan Kot SWA	Services placed at the Disposal of DE FATA	
6	50	Niaz Bad Shah J/Clerk	Lal Badshah	PITE Peshawar	Directorate PITE Peshawar	Already occupied
7	51	Gauhar Ali J/Clerk	Hayat Gul	GHS Ghazli Charsadda	DEO (M) Charsadda	Against Vacant post
8	52	Ghulam Shahi J/Clerk	Gul Amin	GHS Din Muhammad Korona FR Tank	Services placed at the Disposal of DE FATA	
9	55	Mehir Dil Khan J/Clerk	Qalander Shah	AEO Orakzai Agency	Services placed at the Disposal of DE FATA	
10	56	Muhammad Tahir Lab Asstt	Khan Bahadar	GHSS Mazdoor Abad Mardan	SDEO (M) Takht Bhai	Against Vacant post
11	62	Nasim Gul J/Clerk	Umar Khitab	PITE Peshawar	Directorate PITE Peshawar	Already occupied
12	70	Shahid Khan J/Clerk	Abdur Raziq	GGHS Tarkha NSR	GHSS Jabbi, Nowshera	Against Vacant post
13	71	Reyatullah J/Clerk	Zafar Khan	GHS Ragna Sar FR D.I.K	Services placed at the Disposal of DE FATA	
14	83	Isam Khan J/Clerk	Gulapur Khan	DEO (F) Karak	GHSS Chanda Khuram Karak	Against Vacant post
15	86	Khalid Mehmood J/Clerk	Samundar Khan	Abbottabad	DEO (M) Torghar	Against Vacant post
16	87	Saif Ul Islam J/Clerk	Bashir Ahmad	GGHS Bughdada Mardan	GHSS Bughdada Mardan	Against Vacant post
17	88	Javed Akbar J/Clerk	Muhammad Akbar	PITE Peshawar	Directorate PITE Peshawar	Already occupied
18	91	Mukhtiar Ali J/Clerk	Sabz Ali	GGHS Maryan Swabi	DEO (F) Swabi	Against Vacant post
19	92	Sirajuddin J/Clerk	Pir Mohammad	GDC Jamrud Khy Agny	Services placed at the Disposal of DE FATA	

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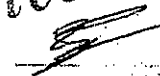
20	94	NOOR REHMAN J/Clerk	ASLAM KHAN	GHS Badragga MKD	RITE (F) Dargai Malakand	Against Vacant post
21	95	Hamayun Khan J/Clerk	Sharif Ullah Khan	GHSS Akbarpura NSR	GGHS Pashtoon Garhi Nowshera	Against Vacant post
22	96	Muhammad Salim Naz J/Clerk	Muhammad Dilbar	GHSS Mingora Swat	GHS Shagai Swat	Against Vacant post
23	97	NAIMAT ULLAH J/Clerk	Muhammad Shah	GHS Hakim Khan Kallay Peshawar	DEO (M) NOWSHERA	Against Vacant post
24	99	Sham Sher Ali J/Clerk	Abdul Maula	GHS No.3 Mingora Swat	GHSS Kishawra Swat	Against Vacant post
25	101	YAQOOB KHAN J/Clerk	NOSHERWAN	GHS Landi Arbab	DEO (M) Nowshera	Against Vacant post
26	102	Muhammad Javed J/Clerk	Muhammad Nazir	GHS No. 1 A.Abad	DEO (M) Torghar	Against Vacant post
27	103	Akhtar Shafi J/Clerk	Mir Shafiullah	Directorate FATA	Directorate of Edu FATA	Against Vacant post
28	104	Abul Raziq	Mohammad Saeed	GHS No. 2 Zaida Swabi	GHS Lahor Swabi	Against Vacant post
29	105	Amjad Ali J/Clerk	Fazal Haider	GGHS Kaludher Swabi	DEO (F) Swabi	Against Vacant post
30	106	S Sultan Ahmad Shah J/Clerk	Fateh Ali Shah	GHS Bakki Mansehra	GHSS SERI GORIA Mansehra	Against Vacant post
31	107	Khalilur Rehman J/Clerk	Noor Ahmad	GGHS Battal Mansehra	GHSS TATROWRA MANSEHRA	Against Vacant post
32	108	Muhammad Ishaq J/Clerk	Bakhtiar	SDEO (F) Shabqaddar CHD	GGHSS Matta Palangzal Charsadda	Against Vacant post
33	110	Naveed Ahmad J/Clerk	Muhammad Rafiq	GHS No.1 Peshawar cantt	GHSS Fathma Mardan	Against Vacant post
34	111	Abdul Khaliq J/Clerk	Badshah Jan	DEO (M) Kohat	GHSS Mohammadzai Kohat	Against Vacant post
35	112	Ghulam Habib J/Clerk	Mohammad Yousif	GGHS Bhera Haripur	DEO (M) Haripur	Against Vacant post
36	113	Mohammad Ijaz J/Clerk	Jan Mohammad Khan	GHSS Mardan	DEO (M) Mardan	Against Vacant post
37	115	Gula Khan J/Clerk	Arabab Khan	GHS Dran Sheikhan Orakzai	GHSS Ibrahimzai Hangu	Against Vacant post
38	117	Amir Mehmood J/Clerk	Muhammad Sharif	DEO(F) Kohat	DEO (F) Kohat	Against Vacant post
39	118	Muhammad Tariq J/Clerk	Muhammad Zahir Alam	GGHSS Gumbat Kohat	GGHSS Gumbat Kohat	Against Vacant post
40	119	ZAHOR ELAHI J/Clerk	Karam Elahi	GCMHSS No. 2 Peshawar city	GHSS Dheri Lakpani Mardan	Against Vacant post
41	120	Abdul Latif J/Clerk	Khair Muhammad	GGHSS Umarzai	GHSS Manga Dargai Charsadda	Against Vacant post
42	121	Ahmad Sher Khan J/Clerk	Sher Zaman	GHSS Hayaserai Dir (L)	GHSS Manyal Dir Lower	Against Vacant post
43	122	KHALID KHAN J/Clerk	GHAFFAR KHAN	GGHS Warsak Colony Peshawar	GGHS Mandori NSR	Against Vacant post
44	123	Noor Zali Khan J/Clerk	Nazr Ali Khan	GGHS Bzar Ahmad Khan Bannu	GGHSS Dheri Saidan Namash Khel Bannu	Against Vacant post
45	124	Waheed Gul J/Clerk	Wazir Gul	DEO (M) Kohat	DEO (F) Kohat	Against Vacant post

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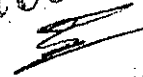
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46	125	Sulaiman Shah J/Clerk	Masai Khan	GHS Saro Shah Mardan	GHSS Pirabad Mardan	Against Vacant post
47	126	Ziarat Khan J/Clerk	SHAHBAZ KHAN	GHSS Garhi Ghulam Shah	GHSS Garhi Ghulam Shah Peshawar	Already occupied
48	127	Zahir Badshah J/Clerk	Gulab Said	O/O the AD Exam; Peshawar	Services placed at the Disposal of DCTE A/Abad	
49	128	Umar Munir J/Clerk	Muhammad Zahir Shah	GHS Shahzadi Dir(L)	GGHSS Koto Dir Lower	Against Vacant post
50	129	Showkat Hayat J/Clerk	Fazal Karim Jan	GGHSS No.1 Saidu sharif Swat	GGHSS No.1 Saidu sharif Swat	Against Vacant post
51	130	Ajab Khan J/Clerk	Ghulam Rehman	GGHS Bherkund Mansehra	GGHS Tarangl Bala Mansehra	Against Vacant post
52	131	FAKHR E ALAM J/Clerk	ALMAS KHAN	GHS Peshawar cantt	GGHSS DI Khel NSR	Against Vacant post
53	132	Zahir Khan J/Clerk	Said Akbar	GCMHS Boys No.4 Kohat	GHSS Muslim Abad Kohat	Against Vacant post
54	133	Mohammad Amin J/Clerk	Abdul Latif	GGHS Wazir Bagh Peshawar	Directorate of Education FATA.	Against Vacant post
55	134	Noor Salim Khan J/Clerk	Muslim Khan	GHS Dalazak Shabqadar, ChD	GHSS Battagram Charsadda	Against Vacant post
56	135	Mohammad Islam J/Clerk	Malak Abdul Aziz	GCMHS Boys Mardan	GGHSS Janrpar Mardan	Against Vacant post
57	136	RAFIULLAH J/Clerk	BANAT KHAN	GHSS Sheikhan Peshawar	DEO(M) Torghar	Against Vacant post
58	137	Fazli Ghaffar J/Clerk	Fazli Akbar	GHSS No.2 Peshawar	S/C at Directorate of PITE Peshawar	Against Vacant post
59	138	Maqbool Ahmad J/Clerk	Sharif Muhammad	GGHSS Ziarat Dir(L)	GGHSS Mian Kalay Dir Lower	Against Vacant post
60	139	Nisar Ashraf J/Clerk	Mohammad Ashraf	DEO (M) Haripur	GHSS Barilla Haripur	Against Vacant post
61	142	Sultan Ali J/Clerk	Jamroz Khan	GHSS Boobak CHD	DEO (M) Charsadda	Against Vacant post
62	143	Rashid Zaman J/Clerk	Gul Zaman	GCMHSS Kot Najibullah Haripur	GCMHSS Kot Najibullah Haripur	Against Vacant post
63	144	Syed Abid Raza J/Clerk	Syed Muhammad Essa	Directorate E&SE kpk	GHS Gadder Mardan	Against Vacant post
64	145	Rustam Khan J/Clerk	Fazli Rokhan	GGHS Shah Pasand Killy CHD	DEO (M) Charsadda	Against Vacant post
65	147	Farhat Ullah J/Clerk	Awai Khan	GHSS Budni Peshawar	GHSS Budni Peshawar	Already occupied
66	148	Arshad Hussain J/Clerk	Shareef Hussain	GHS Muhammad Nari Charsadda	DEO (M) Charsadda	Against Vacant post
67	149	Karam Illahi J/Clerk	Nowrozud Din	GHS Chumurkone Chitral	Services place at the disposal of DEO (F) Dir Upper for further adjustment	
68	150	SIKANDAR HAYAT J/Clerk	HAYATULLAH	GHS Mattani Peshawar	GGHSS Manki Sharif NSR	Against Vacant post
69	151	Abid Ullah J/Clerk	Janat Gul	GGHSS Karak	GGHSS Karak	Against Vacant post
70	152	MUHAMMAD NAEEM J/Clerk	MUHAMMAD YOUSUF	GHS No. 1 Thana, Malakand	GGHSS Dalownow MKD	Against Vacant post
71	153	Alif Gul J/Clerk	Faqir Gul	GGHSS Taru Jabba NSR	GGHSS Taru Jabba NSR	Against Vacant post

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72	154	Ashraf Ali J/Clerk	Sher Zada Khan	GHS Aboha Swat	RITE (F) Barikot	Against Vacant post
73	155	Muhammad Anwar J/Clerk	Raham Din	GGHSS Matta Palangzal CHD	Services place at the disposal of DEO (M) Charzadda for further adjustment	
74	156	KISHWAR KHAN J/Clerk	ABDUL GHAFAR	SDEO (M) Peshawar	GGHSS Sokai Mardan	Against Vacant post
75	157	Khurshid Ahmad J/Clerk	Muhammad Daud	GGHS Attar Shiaha Mansehra	GHSS Shergar Mansehra	Against Vacant post
76	158	Ahmad Khan J/Clerk	Mian Khan	DEO (M) Haripur	GHSS Kahal Haripur	Against Vacant post
77	160	Muhammad Rahim J/Clerk	Shah Rawan	GHS Islampur, Swat	GHSS Chamtali Swat	Against Vacant post
78	161	Karim Ullah J/Clerk	Janat Gul	GHSS Karak	GGHSS EsakChontra Karak	Against Vacant post
79	162	Attau Haq J/Clerk	Muhammad Jan	GGHSS Baffa Mansehra	GHSS Lassa thakral Mansehra	Against Vacant post
80	163	Fazal Rabi J/Clerk	Abdul Hakim	DEO (F) Swat	GHSS Miandam Swat	Against Vacant post
81	165	Waqar Ahmad J/Clerk	Wali Ahmad	GHS Datta Mansehra	GHSS KARORI MANSEHRA	Against Vacant post
82	166	Naseem Gul J/Clerk	Khan Gul	GGHS Bogara Karak	Govt:Physical College Karak	Against Vacant post
83	167	Fakhre alam J/Clerk	Muhammad Shamroz Khan	SDEO (M) CHD	Services place at the disposal of DEO (M) Charsadda for further adjustment	
84	168	Israr Ali J/Clerk	Shahd Ali	DEO (M) Swabi	DEO (M) Swabi	Against Vacant post
85	169	Mian Hussain J/Clerk	Mian Aziz Jan	GHS Bandai Swat	GHSS Sijban Swat	Against Vacant post
86	171	Jehangir Khan J/Clerk	Tajab Khan	GHS Sarri Haripur	GHSS Sarikote Haripur	Against Vacant post
87	174	Ismail J/Clerk	Amir Ghazi	Ghss Fateh Pur Swat	GHSS Fateh Pur Swat	Against Vacant post
88	176	Ikram ud Din J/Clerk	Subhan ud Din	GHS Esaf Khel Karak	GHSS Tapi Kanda Karak	Against Vacant post
89	177	Aftab Ahmad Khan J/Clerk	Sultanat Khan	SDEO (M) Swat	GHSS Madyan Swat	Against Vacant post
90	179	Muhammad Saddique J/Clerk	Sultan Muhammad	GGHS Shahelia Mansehra	GHSS NO.1 MANSEHRA	Against Vacant post
91	180	Muhammad Zakir J/Clerk	Muhammad Ashraf	GGHS M.M Pole Mansehra	GHSS KUZA BANDA BATTAGRAM	Against Vacant post
92	181	Mashkoor Ahmad J/Clerk	Abdudl Shakoor	GHS No. 2 Mansehra	DEO (F) Torgar	Against Vacant post
93	182	Arif Khan J/Clerk	Fazal Khan	GHSS No. 1 Haripur	GHSS Nara Amazal Haripur	Against Vacant post
94	183	Muhammad Mushtaq J/Clerk	Ali Goher	GGHSS Seheel Phulra Mansehra	DEO (F) Torgar	Against Vacant post
95	184	Arshad Mehmood J/Clerk	Jumma Khan	GHS Khanpur Haripur	GHSS Barkot Haripur	Against Vacant post
96	185	Mohammad Riaz Akhtar J/Clerk	Hussan Din	GHS Galham Haripur	GGHSS Sarikote Haripur	Against Vacant post

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97	186	Muhammad Ishaq J/Clerk	Pir Khan	GHS No. 4 Abbottabad	GHSS Boi Abbottabad	Against Vacant post
98	187	Muhammad Nazeer J/Clerk	Abdul Kafeel	GHS Ichhrian Mansehra	DEO (M) Battagram	Against Vacant post
99	188	Hanif Aslam J/Clerk	Mohammad Aslam	GGCMS Kot Najibullah HRP	GHSS Panian Haripur	Against Vacant post
100	189	Nisar Ahmad J/Clerk	Qasim Jan	GGHS Faal Abad Kanju SWT	GHSS Labat Swat	Against Vacant post
101	190	Muhammad Naeem J/Clerk	Muhammad Ishaq	GHS Sirsina Swat	GHSS Miandam Swat	Against Vacant post
102	191	Muhammad Shamim J/Clerk	Muhammad Fahim	GHS Samander Garhi Nowshera	Services place at the disposal of DEO (M) Charsadda for further adjustment	
103	193	Shafiq ur Rehman J/Clerk	Rasool Khan	DEO (M) Abbottabad	DEO (F) Torghar	Against Vacant post
104	194	MUJEEB UR REHMAN J/Clerk	GUL REHMAN	GGHS Sarband Peshawar	GGHSS Dheri Katti Khel NSR	Against Vacant post
105	196	Bakht Ali J/Clerk	Amir Zada	GHSS Charbagh Swat	DEO (F) Shangla	Against Vacant post
106	198	Nasib Khan J/Clerk	Mehar Dil Khan	DEO (M) D.I.Khan	GHSS NO 2 DIKhan	Against Vacant post
107	199	HIDAYAT ULLAH KHAN J/Clerk	SHAHEED ULLAH JAN	GHS Tari Khel Lakki	GHSS Bachken Ahmadzal Lakki	Against Vacant post
108	200	Abdul Ghafoor J/Clerk	Abdul Hakim	GHSS Abdul Khel D.I.Khan	GHSS No.2 DIKhan DIKhan	Against Vacant post
109	201	Sajid Iqbal J/Clerk	Ghulam Qasim	GHS Said Allain DIK	GHSS Kachi Paing Khan DIKhan	Against Vacant post
110	202	Riazul Haq J/Clerk	Ubaidullah	GHS Sweer Chitral	Services place at the disposal of DEO (M) Dir Upper for further adjustment	
111	204	Mayan Khan J/Clerk	Izat mand	GHS Durushkhela Swat	DEO (M) Dir Lower	Against Vacant post
112	205	Muhammad Zafar Iqbal J/Clerk	Faiz Rasool	SDEO (M) Paharpur D.I.Khan	GHSS Katgarh DI Khan	Against Vacant post
113	206	HUKAM KHAN J/Clerk	MOHABAT KHEL	GHS Phar Khel Lakki	GHSS Daraka Aziz Khan Lakki	Against Vacant post
114	208	Mohammad Ibrahim J/Clerk	Amin Akber Khan	GHS Brep Chitral	Services place at the disposal of DEO (M) Dir Upper for further adjustment	
115	209	Hazrat Bilal J/Clerk	Mir Saeed Shah	GGHS Kotkar Dawat Khan Bannu	GGHSS Kotka Bilawar Khan Bannu	Against Vacant post
116	211	Niaz Ali Shah J/Clerk	Gulbar	GHS Mudhalki Nowshera	GGHSS Misri Banda NSR	Against Vacant post
117	212	JANAS KHAN J/Clerk	NASAR ULLAH	DEO (M) Peshawar	GHSS Kati Garhi Mardan	Against Vacant post
118	213	Muhammad Pervaz J/Clerk	Muhammad Ali	GHSS Gumbat Kohat	GHSS Gumbat Kohat	Against Vacant post
119	214	Fazal Khan J/Clerk	Gul Wali Khan	GHS Gul Akbar Killi FR Pesh	Services placed at the disposal of Director FATA	
120	215	Rais Khan J/Clerk	Salam Muhammad Khan	GGHS Jangal Khel Kohat	GHSS Shaheed Zeeshan Shafiq Kohat	Against Vacant post
121	216	Sahib Shah J/Clerk	Kamal Shah	DEO (F) Kohat	RITE (F) Kohat	Against Vacant post

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122	217	Muhammad Jalil J/Clerk	Saldad Khan	GHS Babar Khacha DIKhan	RITE (M) DIKhan	Against Vacant post
123	218	Muhammad Shahzad J/Clerk	Muhammad Aslam	GHS Mir Pur A.Abad	GHSS Mirpur Abbottabad	Against Vacant post
124	219	Qudrat Ali J/Clerk	Mansab Ali	GGHS Ustarzai Payan Kohat	GHSS Khadizai Kohat	Against Vacant post
125	222	Arshad Khan	Abdul Manan	GHS Mashogagar Peshawar	GHSS Gujar Garhi Mardan	Against Vacant post
126	221	Mujeeb ur Rehman J/Clerk	Umar Farboq	GHS No. 2 Kohat	GHS No. 1 Kohat	Against Vacant post
127	223	Muhammad Amjid J/Clerk	Fateh Khan	GHS Khaki Mansehra	Services placed at the disposal of DEO (F) Kohistan.	
128	224	Ijaz ud Din J/Clerk	Rushan Din	GHSS Nizampur NSR	GHSS Nizampur NSR	Against Vacant post
129	225	Raees Khan J/Clerk	Ghulam Rabbani	GHS Kotarpan NSR	GHS Rashkai NSR	Against Vacant post
130	226	Jehan Zeb Khan J/Clerk	Aurangzeb	DCTE Abbottabad	Services placed at the Disposal of DCTE A.Abad	
131	227	GHYUR JAVED J/Clerk	M/YOUNAS	GHS Garhi Chandan Payan Peshawar	GHSS Qasmi Mardan	Against Vacant post
132	230	Dinar Azam J/Clerk	Nadir Khan	DEO (M) Chitral	Services placed at the disposal of DEO (M) Dir Upper	
133	231	Mahboob Ali J/Clerk	Nawab Khan	GHS Birganisar Chitral	Services placed at the disposal of DEO (F) Dir Upper	
134	233	Jalalud Din J/Clerk	Ajab Gul	GGHS Ayan Chitral	Services placed at the disposal of DEO (F) Dir Uper	
135	234	Syed Shahabud Din J/Clerk	Rahmat Ali Khan	GHSS Harchin Chitral	GHSS Harchin Chitral	Against Vacant post
136	235	Khosh Bahar Shah J/Clerk	Sher Murad	DEO (M) Chitral	Services placed at the disposal of DEO (F) Dir Upper	
137	236	Rahmat Hakim J/Clerk	Abdul Hakim	DEO (M) Chitral	Services placed at the disposal of DEO (M) Dir Upper	
138	237	Jamilullah J/Clerk	Musharafud Din	SDEO (M) Chitral	GHSS Azakhel Payan NSR	Against Vacant post
139	238	Muhammad Tahir J/Clerk	Usman Ghani	DEO (M) Kohat	DEO (M) Kohat	Against Vacant post
140	239	Hazratullah J/Clerk	Ghufranullah	GHS Kessu Chitral	Services placed at the disposal of DEO (M) Dir Upper	
141	240	Gul Said J/Clerk	Hamish Khan	GGHS Sari Behlool T.Bhai Mardan	GGHSS Takht Bai Mardan	Against Vacant post
142	241	Zahoor Jan J/Clerk	Munfarish	GHSS Boobak CHD	GHSS No. 4 Mardan	Against Vacant post
143	242	Gul Mohammad J/Clerk	Tor Gul	GHSS Takkar Mardan	GHSS Hathian Mardan	Against Vacant post
144	243	FAZLE AKBAR J/Clerk	GUL AKBAR	GHS Palosi Maghdarzal Pesh	GGHSS Nizam pur Nowshera	Against Vacant post
145	244	Salfullah Jan J/Clerk	Abdul Majid	GGHSS Ghoriwala Bannu	GGHSS Ghoriwala Bannu	Against Vacant post
146	245	Muhammad Amin Ul Zahid J/Clerk	Muhammad Zahid	GHS Hathala D.I.Khan	GHSS koral DI Khan	Against Vacant post

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147	246	Munawar Sultan J/Clerk	Ghulam Sarwar	GHS Bher Kund Mansehra	GHSS Paimal Sharif Battagram	Against Vacant post
148	247	HAYAT ULLAH KHAN J/Clerk	ADAM KHAN	GGHS No. 2 Serai Naurang Lakki	GHSS Sarai Naurang Lakki	Against Vacant post
149	248	Khair Din J/Clerk	Abdul Razzaq	GHSS No. 4 D.I.Khan	GHSS Choudwan DI Khan	Against Vacant post
150	249	Khalid Saleem Aftab J/Clerk	Ghulam Farid	DEO (F) D.I.Khan	DEO (F) DI Khan	Against Vacant post
151	250	Ghulam Farid J/Clerk	Haji Ghulam Yasin	DEO (M) D.I.Khan	GHSS No.2 DI Khan	Against Vacant post
152	251	Ikram Ullah J/Clerk	Kabir Khan	GHS Bahadari D.I.K	GHSS Kacha Mall Khel DI Khan	Against Vacant post
153	252	Jamshed Khan J/Clerk	Haq Nawaz	DEO (F) D.I.Khan	SDEO (F) DI Khan	Against Vacant post
154	253	Aftab Ahmad Rafique J/Clerk	Muhammad Sharif	DEO (M) D.I.Khan	DEO (F) DI Khan	Against Vacant post
155	254	Waris Khan J/Clerk	Abdul Ghani	GHS Chamhad A.Abad	SDEO (M) Torghar	Against Vacant post
156	255	Wasil Shah J/Clerk	Yar Badshah	SDEO (F) Kohat	GHSS Lachi Kohat	Against Vacant post
157	256	Iftikhar Ahmad J/Clerk	Gul Rehman	GHS Lal Garhi Kohat	GHSS M khwaja Hangu	Against Vacant post
158	257	Azhar Shah J/Clerk	Akbar Khan	GGHS Sheikhan Kohat	DEO (M) Hangu	Against Vacant post
159	258	Hameedullah J/Clerk	Ameer Badshah	DEO (F) Kohat	GHSS Ustarzai Kohat	Against Vacant post
160	259	Shakir Zaman J/Clerk	Muhammad Younas Khan	GGHS Naullah Soha Haripur	GGHS Hathar Haripur	Against Vacant post
161	260	Muhammad Rustam J/Clerk	Hashim Khan	GHSS Wali Noor Jani Khel Bannu	DEO (F) Bannu	Against Vacant post
162	261	NAQIB ULLAH KHAN J/Clerk	ABDUL AZIZ KHAN	GGHS Nar Sardar Maided Khel Lakki	GHSS Kot Kashmir Lakki	Against Vacant post
163	262	Safdar Khap J/Clerk	Amin Ullah	SDEO (F) Karak	DEO (F) Karak	Against Vacant post
164	264	Qimat Gul J/Clerk	Anwar Shareen	GHS Kirrosam Kohat	SDEO (M) Hangu	Against Vacant post
165	265	Muhammad Abbas J/Clerk	Muhammad Nawaz	GHSS Daraban Kalan D.I.K	GHSS Daraban Kalan D.I.K	Against Vacant post
166	266	Shabir Ahmad J/Clerk	Ghulam Yasin Khan	GGHS Billitang Kohat	DEO (M) Hangu	Against Vacant post
167	267	Muhammad Ajmal J/Clerk	M Sher Gul	DEO (F) Mansehra	DEO (M) Kohistan	Against Vacant post
168	268	Asif Jan J/Clerk	Nazir Gul	GGHS Haji Jamroz Khan Killi CHD	GHSS Ghala Dher Mardan	Against Vacant post
169	271	Fazal Rahman J/Clerk	Dawood Khan	GGHS Tordher Swabi	GHSS Jehangira Swabi	Against Vacant post
170	272	Azmat Ali Shah J/Clerk	Zain Ul Abideen	SDEO (F) Karak	DEO (F) Karak	Against Vacant post
171	273	Asmat Ullah J/Clerk	Muhammad Raees	DEO (M) Karak	GHSS Kando Khel Karak	Against Vacant post
172	274	Zainul Wahab J/Clerk	Said Wahab	GGHS Parmoli Swabi	GGHS Lahore Swabi	Against Vacant post

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173	275	Muhammad Ijaz J/Clerk	Malik Aman	GGHS Moorat Maira Mansehra	SDEO (F) Torghar	Against Vacant post
174	277	Faiz ur Rehman J/Clerk	Raees Khan	GGHS Warana Karak	DEO (M) Karak	Against Vacant post
175	278	Qazi Syed Anwar Shah J/Clerk	Qazi Syed M. Shah	SDEO (M) Karak	SDEO (M) Karak	Against Vacant post
176	279	Said Muhammad J/Clerk	Sher Muhammad	GHS Jabba Khush NSR	GHSS Shaidu NSR	Against Vacant post
177	280	Muhammad Nazir J/Clerk	Muhammad Suleman	GHS Mir Pur A. Abad	Services placed at the disposal of DEO (M) Kohistan	
178	281	Ghulam Sarwar J/Clerk	Karim Jan	GGHS No.1 Pabbi	GGHSS Muhib Banda Nowshera	Against Vacant post
179	282	Zakir Hussain J/Clerk	Gulzar Khan	GGHS Turlandi Swabi	GGHSS Dagai Swabi	Against Vacant post
180	283	Musafar Khan J/Clerk	Abdur Rauf	GHSS Khushgi Payan NSR	SDEO (M) Nowshera	Against Vacant post
181	284	Alif Zada J/Clerk	Amir Zada	GHS Baghbanpura Akora Khattak NSR	DEO (M) Nowshera	Against Vacant post
182	286	Abdul Haleem J/Clerk	Shahib Khan	GHS Town Committee Karak	DEO (M) Karak	Against Vacant post
183	288	Jamal Ud Din J/Clerk	Abdur Rahman	GGHSS Kabal Swat	SDEO (M) Samar Bagh	Against Vacant post
184	289	Fazli Raziq J/Clerk	Fazli Khaliq	GHSS Panj Pir Swabi	GHSS Panjpir Swabi	Against Vacant post
185	290	Shujaud Din J/Clerk	Sarafud Din	GHS Shahqadar Fort, Charsadda	GHSS Kata Khat Mardan	Against Vacant post
186	292	Abdul Aziz J/Clerk	Abdul Hameed	SDEO (F) Nowshera	SDEO (F) NSR	Against Vacant post
187	294	Rahmatullah J/Clerk	Abdur Rashid	DEO (M) Swat	GCMHSS Timergara Dir (L)	Against Vacant post
188	295	Mir Bashir J/Clerk	Deedar Gul	GGHSS Nowshera Cantt	GGHSS Nowshera Cantt	Against Vacant post
189	296	Tariq Ali J/Clerk	Bakht Rawan	DEO (M) Swat	SDEO (M) Timargara Dir Lower	Against Vacant post
190	297	Nadir Khan J/Clerk	Azim Gul	GHS Dagi Banda NSR	GGHSS AZAKHEL BALA NSR	Against Vacant post
191	298	Iftikhar Mohammad J/Clerk	Gul Mohammad	GGHS Par Hoti Mardan	GGHSS RUSTAM KHEL MARDAN	Against Vacant post
192	299	Mohammad Saeed J/Clerk	Abdul Malik	GHS Hoti Landaki Mardan	GGHSS NO.1 MARDAN	Against Vacant post
193	300	M/KARIM J/Clerk	FATEH KHAN	GHS Haji Muhammad Noor Kali Peshawar	GGHSS ALO MARDAN	Against Vacant post
194	301	Amir Ali J/Clerk	Umar Wahid	GHSS Sher Garh Mardan	GHSS SHERGARH MARDAN	Against Vacant post
195	302	Iqrar Ahmad J/Clerk	Ali Jan	GGHS Marghuz Swabi	GGHSS BAJA SWABI	Against Vacant post
196	303	Abdul Khaliq J/Clerk	Sain Muhammad	GHS Jaba Mansehra	GHSS Thakot Battagram	Against Vacant post
197	305	MUHAMMAD GOHAR J/Clerk	GUL REHMAN	GSMDHS Mathra Peshawar	GHSS Khanpur Dir Lower	Against Vacant post

Said Ghani
Senior
Tka
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198	308	Muhammad Zahid Khan J/Clerk	Mughal Khan	GHS Shaghali Payan Peshawar	GHS Gul Bela Peshawar	Against Vacant post
199	309	Abdul Nasir J/Clerk	Amir Zada	GGHS School Shergao CHD	GHSS Garhi Kapura Mardan	Against Vacant post
200	310	MUMTAZ GUL J/Clerk	TAJ GUL	GHS Haryankot Mkd	DEO (M) Malakand	Against Vacant post
201	311	Mushtaq Hussain J/Clerk	Fazal Shah	Directorate E&SE kpk	GHSS Ikarimpur Mardan	Against Vacant post
202	313	MUTAHER ZAIB J/Clerk	MIAN GUL	SDEO (M) Dargai MKD	SDEO (M) Dargai MKD	Against Vacant post
203	314	NASIB KHAN J/Clerk	GUL BADSHAH	GHS G.U.Khel MKD	GHSS Shakhakat No.1 MKD	Against Vacant post
204	315	ISHAQ MUHAMMAD J/Clerk	SALAR MUHAMMAD	GHS Matkani MKD	SDEO (M) Malakand	Against Vacant post

(Consequential Transfers)

The following posting/transfer/adjustment in respect of following Junior & Senior Clerks of E&SE District Karak, Charsadda & DIKhan are hereby ordered on their own pay and BPS in the interest of public service with effect from the date of their taking over charge:-

S.#	Name & Designation	Present posting	Adjusted at	Remarks
1	Saifullah J/Clerk	Working against S/C post at GGHS Karak	J/Clerk GGHS Karak	Against vacant post
2	Tamheed J/Clerk	Working against S/C post at DEO (M) Charsadda	CHS Munshiano Killi Charadadda	Against vacant post
3	Attiquillah S/C	DEO (M) Karak (under transfer to GGHS Karak)	GHSS Karak	Vice S.No.4
4	Dakhtil Badshah S/C	GHSS Karak	GHSS Jandrai Karak	Against vacant post
5	Niamatullah S/C	GHSS Darban Kallan DIK	GHSS Hathala DIK	Against vacant post

Note:-

1. Charge reports should be submitted to all concerned.
2. They will be on probation for one year, extendable for another term of one year as specified in Rule-15 of Khyber Pakhtunkhwa Civil Servant (Appointment, Promotion and Transfer) Rules, 1989.

(Muhammad Rafiq Khattak)
DIRECTOR


Endst: No 5018-5218/A-23/MS/Promotion JC to SC/ 2017. Dated Peshawar the 30/5/2017
Copy of the above is forwarded for the information and necessary to the:-

- 1) Account General, Khyber Pakhtunkhwa, Peshawar.
- 2) Director Curriculum & Teacher Education, Khyber Pakhtunkhwa, Abbottabad.
- 3) Director of Education (FATA) Peshawar.


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- 4) Director PITE, Khyber Pakhtunkhwa, Peshawar.
- 5) District Education Officers (Male & Female) concerned.
- 6) Agency Education Officers concerned.
- 7) District Accounts Officers concerned.
- 8) Principals/ Headmasters/Headmistress concerned.
- 9) Principal Govt: Vocational School for Women Peshawar.
- 10) Sub: Divisional Education Officers (Male & Female) concerned.
- 11) Assistant Director (Exam) at PITE Peshawar.
- 12) Officials concerned.
- 13) PA to Director E&SE Khyber Pakhtunkhwa, Peshawar.
- 14) PA to Additional Director (Estab) E&SE Khyber Pakhtunkhwa, Peshawar.
- 15) Master File.


Assistant Director (Admn)
Directorate E&SE Khyber Pakhtunkhwa
Peshawar

awms
30/1/2017

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Advocate

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**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL AT PESHAWAR**

WAKALAT NAMA

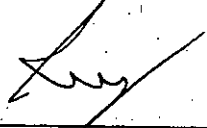
Service Appeal No : _____ of 2024

Titled: **Said Ghani VERSUS The Director And others**

I, do hereby appoint ABDUL NASIR ADVOCATE HIGH COURT, in the above mentioned case, to do all or any of the following acts, deeds and things:

- 1) To appear, act and plead for me/us in the above mentioned case in this Court/Tribunal in which the same may be tried or heard, and any other proceedings arising out of or connected therewith.
- 2) To sign and verify and file, petitions, appeals, affidavits and applications as may be deemed necessary or advisable by them for the conduct, prosecution or defense of the said case at all its stages.
- 3) To receive payment of, and issue receipts for, all moneys that may be or become due and payable to us during the course of the proceedings.
- 4) To do any act necessary or ancillary to the above acts, deed and things.
- 5) To appoint any other counsel to do any/all of the acts, deeds and things.
- 6) I/we, shall appear in the court/tribunal on every date of hearing for assistance and if due to my/our non-appearance, any adverse judgment/order/decree is passed, they will not be held responsible.

IN WITNESS whereof I/we have signed this *Wakalatnama* hereunder, the contents of which have been read/explained to me/us and fully understood by me/us this



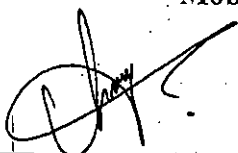
Signature of Executant

Said Ghani Senior Clerk (BPS-14)

CNIC NO: 15602 8913 013-9

Mobile No: 0333-9464663

ATTESTED AND
ACCEPTED BY:



ABDUL NASIR

Advocate, High Court

0344 455 7383, grapixworld@yahoo.com