

FORM OF ORDER SHEET

Court of _____

Appeal No. _____

636 /2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	06/05/2024	<p>The appeal of Mr. Liaqat Ali presented today by Mr. Umar Farooq Mohmand Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 08.05.2024. Parcha Peshi given to the counsel for the appellant.</p> <p>By the order of Chairman</p> <p>REGISTRAR</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

No. _____/202

Mr. Liaquat Ali

Vs

Education Deptt

APPLICATION FOR FIXATION OF THE ABOVE
TITLED APPEAL AT PRINCIPAL SEAT,
PESHAWAR.

Respectfully Sheweth:

1. That the above mentioned appeal is submitted before this Hon'ble Tribunal in which no date has been fixed so far.
2. That according to Rule 5 of the Khyber Pakhtunkhwa Tribunal Rules 1974, a Tribunal may hold its sitting at any place in Khyber Pakhtunkhwa which would be convenient to the parties whose matters are to be heard.
3. That it is worth mentioning here that other similar appeal regarding similar prayer submitted before this Hon'ble Tribunal and the above mentioned appeal have also similar prayer regarding fixation of pay, which are fixed on 16.05.2024 before this Hon'ble Tribunal at Principal seat Peshawar, so for the best administration of justice the instant appeal may also be fixed before principal seat of this tribunal.
4. That any other ground will be raised at the time of arguments with the permission of this Hon'ble Tribunal.

It is therefore prayed that on acceptance of this application the above titled appeal may please be fixed at Principal Seat, Peshawar for the Convenience of parties and best interest of justice.

Lawyer
Appellant/Applicant

Through

Dated 06-05-2024

[Signature]
Umar Farooq Mohmand
Advocate High Court Peshawar.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 636 /2024

Mr. Liaquat Ali APPELLANT

VERSUS


The DEO Dir Lower RESPONDENT

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Dated:

Through: APPELLANT


UMAR FAROOQ MOHMAND


WALED ADNAN


MUHAMMAD AYUB
ADVOCATES HIGH COURT

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 636 /2024

Mr. Iiaquat Ali, PST BPS-12,
GHS Dherai Talash, Dir Lower.

.....APPELLANT

VERSUS

1. The Director Elementary and Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
2. The District Education Officer, District Dir Lower.

.....RESPONDENT

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE INACTION OF THE RESPONDENT BY NOT GRANTING/ALLOWING PAY PROTECTION/FIXATION TO THE APPELLANT W.E.F.30/04/2014 I.E. FROM THE DATE OF INITIAL APPOINTMENT AND AGAINST THE INACTION OF THE RESPONDED BY NOT DECIDING THE DEPARTMENTAL APPEAL OF THE APPELLANT WITH IN THE STATUTORY PERIOD OF NINETY DAYS.

PRAYER:

That on acceptance of this appeal the appellant may kindly be allowed/granted pay fixation w.e.f. 30/04/2014 i.e. from the date of initial/first appointment with all back benefits. Any other remedy which this august Service Tribunal deems fit that may also be awarded in favor of the appellant.

R/SHEWETH:

ON FACTS:

Brief facts giving rise to the present appeal are as under:

- 1- That the appellant was initially appointed as PST (BPS-12) vide order dated 30/04/2014 after fulfilling all the codal formalities, and since appointment the appellant performing his duty quiet efficiently and to the entire satisfaction of their high ups. Copy of appointment order is attached as Annexure..... **A**
- 2- That it is important to mention here that during service of the appellant on the post of PST (BPS-12), the respondent again advertised the post of PST (BPS-12), whereby the appellant

applied to the same through proper channel and after proper recommendation of the Departmental Selection Committee the appellant was appointed as PST (BPS-12) vide order dated 28/02/2015 and started performing his duties quite efficiently and to the entire satisfaction of his high ups. Copy of the 2nd appointment order is attached as annexure.....**B**

3- That the service of the appellant was regularized through Notification dated 07/03/2018 in pursuance to the Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Service) Act, 2018. Copy of the Notification is attached as annexure.....**C**

4- That it is important to mention here that the respondent department granted /allowed pay protection to the other similar employs, furthermore this Honorable Tribunal also in Service Appeal No. 7364/2021 vide order dated 27.11.2023 allowed the appeal for similar relief. Copies of the Notification & order dated 27/11/2023 of this Honourable Tribunal are attached as annexure.....**D & E**

5- That felling aggrieved from the inaction of the respondent by not allowing pay protection to the appellant, the appellant preferred Departmental Representation, but the same has not been decided till date. Copy of the representation/appeal is attached as annexure.....**F**

6- That feeling aggrieved and having no other remedy the appellant filed the instant appeal on following grounds inter alia:-

GROUND:

A- That the impugned the inaction of respondents by not allowing pay fixation and protection to the appellant w.e.f. initial appointment i.e. 30/04/2014 are against the law, facts, norms of natural justice and materials on the record.

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

- C- That the respondents acted in arbitrary and mala fide manner by not allowing pay fixation to the appellant w.e.f. initial appointment i.e 30/04/2014 and as such the inaction of the respondents is violative of law and rules.
- D- That the inaction of the respondents is discriminatory and against the norms of natural justice, therefore not tenable in the eye of law.
- E- That under Article 38 (e) of the Constitution of Pakistan, 1973 state is bound to reduce disparity in the income and earning of the individuals including persons in the various services of Pakistan, therefore in light of the above mentioned Article the appellant is fully entitle for the grant of pay fixation w.e.f. 30/04/2014 the date of initial appointment but the same has not been done in case of appellant which is evident from the pay role of the appellant.
- F- That as per rule 2.3 of the West Pakistan Pension Rules, 1963 and FR 22 the appellant is fully entitled for the grant of pay fixation w.e.f. initial appointment with all back benefits.
- G- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

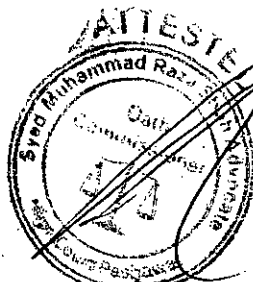
It is therefore, most humbly prayed that the appeal of the appellant may be accepted as prayed for.

Dated:

Through: *Umar Farooq Mohmand*
 APPELLANT
UMAR FAROOQ MOHMAND
Waled Adnan
WALED ADNAN
Muhammad Ayub
MUHAMMAD AYUB
 ADVOCATES HIGH COURT

AFFIDAVIT

I, Mr. Iiaquat Ali, PST BPS-12,GHS Dherai Talash, Dir Lower, do hereby solemnly affirm and declare on Oath that the contents of this **Service Appeal** are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Court.



DEPONENT
Iiaquat Ali

03 MAY 2024

"A" (4)

District Education Officer (M) D/Lower

Part (M)

[Handwritten Signature]



PI No. 0915-02500SL
E-mail: emsdirlower@yahoo.com

OFFICE ORDER:

Consequent upon the recommendation / approval of the District Selection Committee / District Promotion Committee (Elementary & Secondary Education) D/Lower in its meeting held on 30/04/2014, the following Qari Teachers (Male) (School based) are hereby appointed in BPS-12 (Rs. 500-500-22000) @ Rs. 7000/- fixed plus usual allowances as admissible under the rules on adhoc basis on Contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below:

Sr	Roll No	Name	Father's Name	Name of School	Score
1	01600569	IRSHAD GHAFOR	SHAHRA MAND	GHS SHOHSHING	140.5
2	601600316	SAJIAD AHMAD	MUHAMMAD RASOOL KHAN	GHS SAFARAI	141.62
3	01600537	LIAQUAT ALI	ABDUL WAHID	GHS DHEER TALAB	141.55
4	891600340	NAIK ZADA	HASHMAT ALI KHAN	GHS MIAN KALAI	141.43
5	01600326	ZIAUR RAHMAN	AMIR MUHAMMAD	GHS DRANGAL	141.21
6	891600298	NOOR ZAMAN KHAN	MASAL SAID	GHS TAKRO	140.26
7	01600286	RAHAT KHAN	BAKHT ZAMAN	GHS LAJ BOKK	139.6
8	891600536	FAZAL ELLAHI	NOWSHER KHAN	GHS SADRARKALEY	139.47
9	01600575	SAMI ULLAH	ISMAIL	GHS SHALKANI	138.87
10	891600272	MUHAMMAD RIAZ KHAN	SHER ZAMAN KHAN	GHS UTALA	138.34
11	891600293	SADIQ ULLAH	AMIN ULLAH	GHS MIAN BANDA	136.29
12	891600408	ZAHOR UL HAQ	MUHAMMAD ZAHIR SHAH	GHS REHANPUR	136.49
13	891600269	UMAR HAYAT	ABDUL QADAR	GHS BARIAM MARHAI	135.97
14	891600249	FATH ULLAH	RAHIMULLAH	GHS JAWZO	135.02

TERMS AND CONDITIONS:

- This order will commence from 01/03/2015 and shall continue up to 29/02/2016 and will, however, not constitute in any form, either express or implied, any assurance for future employment with the Elementary and Secondary Education Department.
- They will be entitled to emoluments of Rs. Rs. 7000/- fixed plus usual allowances as admissible under the rules on adhoc basis on Contract per month for one year and will be eligible for tax deduction (if any) as per prevailing government rules.
- Their Pay will not be drawn until and unless a certificate to the effect by DDO (concerned) is issued that their certificates are verified.
- They will produce Health and Age Certificate from the Medical Superintendent concerned before taking over charge.
- They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- Their services shall be terminated at any time, in case their performance is found unsatisfactory during their contract period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
- Their appointment will be made on School based, they will have to serve at the place of posting, and their service is not transferable to any other station.
- The appointment of the candidates mentioned above is subject to the condition that they are domiciled in District D/Lower.
- NO TA/DA will be paid to them on joining the post.

[Handwritten Signature]
Officer
D/Lower

[Handwritten Signature]

TESTED

- 8. The appointment of the candidates mentioned above is subject to the condition that they are domiciled in District Dir Lower.
- 9. NO TA/DA will be paid to them on joining the post.
- 10. Their age may not exceed 35 years or below 20 years.
- 11. Charge reports should be submitted to all concerned.
- 12. Drawing & Disbursing Officers concerned are directed to collect photo copies of their testimonials along with verification fees and submit the same to the office of the undersigned for further verification from the institutions concerned.
- 13. This order is issued, errors and omissions accepted, as a notice only.
- 14. 100 % candidates have been initially recruited from amongst those candidates who have qualified NTS test for the purpose purely on merit.

(Muhammad Ibrahim)
 District Education Officer (M)
 District Dir Lower

Endst. No. 6691 / Dated Timergara the 30/04/2014.

Copy of the above is forwarded to:

- 1. The Director (E&SE) Khuber Pakhtoon Khwa Peshawar.
- 2. The District Accounts Officer Dir Lower.
- 3. The Principals / Headmaster of the institute concernd.
- 4. The Offcails concernd.

Muhammad Ibrahim
 District Education Officer (M)
 District Dir Lower

[Signature]
 ATTESTED

"B" (6)

K



PT No. 0015-9250082,

E-mail: emr_lower@yahoo.com

(Qazi (M))

OFFICE ORDER:

Consequent upon the recommendation / approval of the District Selection Committee / District Promotion Committee (Elementary & Secondary Education) Dir Lower in its meeting held on 30/04/2014, the following Qazi Teachers (Male) (School based) are hereby appointed on HPS-12 (Rs. 7000-500-2000) @ Rs. 7000/- fixed plus usual allowances as admissible under the rules on adhoc basis on Contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below:

Sr	Name	Father Name	Address	Name of School	Score
1	MUHAMMAD ILYAS	MIRZA MUHAMMAD	Major Samarbagh Dir (L)	GHS Tangi Ting	151.94
2	NASEER AHMAD	RASHID AHMAD	Quch Dir Lower	GHS Gumbat Banda	149.35
3	HAFEEZ UR REHMAN	ABDULLAH	Kandara Begon Dir (L)	GHS Begon	148.22
4	IBRAHIM JALIL	SIYAT JALIL	Khal Kandara Dir (L)	GHS Matakand	147.15
5	IRFAN KHAN	WAHID ZAMAN	Quch Dir Lower	GHS Darnal Bala	146.9
6	FAKIRUL AMIN	MOHAMMAD ZAMIN	Khal Dir (L)	GHS Watangi	146.54
7	NOOR HAZRAT	SHAKIRULLAH	Asban Dir (L)	GHS Darnal Payen	146.65
8	MURAD ALI	AZIM ULLAH KHAN	Haroon Dir Lower	GHS Manz Banda	146.4
9	IAQUAT ALI	ABDUL WAHID	Quch Dir Lower	GHS Sangolai	145.6
10	RAHAM GHAFFAR	ALAM BARSIAH	Khadagzai Dir Lower	GHS Merakai	145.5
11	WASIM UL BARI	UBAID UL BARI	Quch Dir Lower	GHS Koheray	145.37
12	GUL ZAMIN	SHAH FERAZ	Tazagram Ardenzi Dir (L)	GHS Dadiwan	145.14
13	KHALIQ MUHAMMAD	BADSHAH MUHAMMAD	Tuormang Dir (L)	GHS Shalkani	145.1
14	FASHI ULLAH	SUBTANI GUL	Goharyat Zaindara Dir (L)	GHSS Zainadara	143.2
15	MUSLIM	MOMIN KHAN	Quch Sharqi Dir (L)	GHS Dapoor	143.27
16	INAM ULLAH	SULTAN MEHMOOD	Mianbrangula Dir (L)	GHS Pato Talash	143.03

TERMS AND CONDITIONS:

1. This order will commence from 01/05/2014 and shall continue up to 30/04/2015 and will, however, not construe in any form, either express or implied, any assurance for future employment with the Elementary and Secondary Education Department.
2. They will be entitled to emoluments of Rs. 7000/- fixed plus usual allowances as admissible under the rules on adhoc basis on Contract per month for one year and will be eligible for tax deduction (if any) as per prevailing government rules.
3. Their Pay will not be drawn until and unless a certificate to the effect by DDO (concerned) is issued that their certificates are verified.
4. They will produce Health and Age Certificate from the Medical Superintendent concerned before taking over charge.
5. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
6. Their services shall be terminated at any time, in case their performance is found unsatisfactory during their contract period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
7. Their appointment will be made on School based, they will have to serve at the place of posting; and their service is not transferable to any other station.

(Signature)
 District Education Officer
 (M) Dir Lower

ATTESTED

- 12. The District Officers concerned are directed to direct the institutions to submit testimonials and photographs along with the application fees and submit the same to the office of the District Education Officer for further consideration.
- 13. The institutions concerned are directed to accept only those candidates who have qualified in the examination for the purpose purely on merit.

(Muhammad Ibrahim)
 District Education Officer (M)
 District Dir Lower

Dated Timergara the 28/02/2015.

Endst. No. 1430-1450

Copy of the above is forwarded to:

- 1. The Director (E&SE) Khuber Pakhtoon Khwa Peshawar.
- 2. The District Accounts Officer Dir Lower.
- 3. The Principals / Headmaster of the institute concerned.
- 4. The Office a/c concerned.

(Signature)
 District Education Officer (M)
 District Dir Lower

(Signature)
 District Education Officer (M)
 District Dir Lower

ALISTED
(Signature)




11211 8

**OFFICE OF THE
DISTRICT EDUCATION OFFICER (MALE)**
Dir Lower (Phone # 0945 9250081-82)

NOTIFICATION.

In pursuance of Section-3 of the Khyber Pakhtunkhwa Employees of Elementary & Secondary Education Department (Appointment & Regularization of Services) Act, 2017, read with section-1 sub-section-(2) of the Act ibid and Law Department Government of Khyber Pakhtunkhwa advice bearing No. ALD-III/Legis:1(4)2017/Vol-1/0888-90 dated 20.03.2017 & Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department Notification No. SO(S/F)E&SED/3-2018/SITT/Contract, services of the following Qaris are hereby regularized in BPS-12 with effect from the date of their initial appointment.

Sr	Name	Father Name	Name of School	D.O.B	Score	Appointment order No and dated
1.	Hafeez ur Rehman	Abdullah	GHS BEYARAI	14/04/1988	148.22	Endst No: 6691/Qari/Appointment /Ad hoc/NTS dated: 30.04.2014
2.	Ibrahim Jalil	Niamat Jalil	GHSS Malakand	01/01/1989	147.15	Endst No: 6691/Qari/Appointment /Ad hoc/NTS dated: 30.04.2014
3.	Fakhrul Amin	Muhammad Zamin	GHS WATANGI	02/01/1990	146.84	Endst No: 6691/Qari/Appointment /Ad hoc/NTS dated: 30.04.2014
4.	Murad Ali	Azimullah Khan	GHS MANZ BANDA	02/03/1982	146.37	Endst No: 6691/Qari/Appointment /Ad hoc/NTS dated: 30.04.2014
5.	Raham Ghaffar	Alam Badshah	GHS MIRAKAI	26/02/1986	145.5	Endst No: 6691/Qari/Appointment /Ad hoc/NTS dated: 30.04.2014
6.	Fasihullah	Subhani Gul	GHSS Zaimdara	20/04/1989	143.7	Endst No: 6691/Qari/Appointment /Ad hoc/NTS dated: 30.04.2014
7.	Inamullah	Sultan Mehmood	GHS Pato Talash	03/03/1987	143.03	Endst No: 6691/Qari/Appointment /Ad hoc/NTS dated: 30.04.2014
8.	Irshad Ghafoor	Shahramand	GHS SHORSHING	02/08/1986	147	Endst No: 1430- 1450/Qari/Appointment /Ad hoc/NTS dated: 28.02.2015
9.	Liaquat Ali	Abdul Wahid	GHS Dherai Talash	17/02/1983	141.59	Endst No: 1430- 1450/Qari/Appointment /Ad hoc/NTS dated: 28.02.2015
10.	Naik Zada	Hashmat Ali Khan	GHS MIAN KALAI	15/02/1987	141.43	Endst No: 1430- 1450/Qari/Appointment /Ad hoc/NTS dated: 28.02.2015


~~APPROVED~~

9

Sr	Name	Father Name	Name of School	D.O.B	Score	Appointment order No and dated
11.	Noor Zaman Khan	Masal Said	GHS TAKORO	10/02/1988	140.26	Endst No: 1430-1450/Qari/Appointment /Ad hoc/NTS dated: 28.02.2015
12.	Sadiq Ullah	Amin Ullah	GHS Mian Banda	06/04/1987	138.29	Endst No: 1430-1450/Qari/Appointment /Ad hoc/NTS dated: 28.02.2015
13.	Umar Hayat	Abdul Qadir	GHS Barjam Makhai	27/02/1985	135.97	Endst No: 1430-1450/Qari/Appointment /Ad hoc/NTS dated: 28.02.2015
14.	Fathullah	Raheem ullah	GHS Jawzo	02/04/1991	135.02	Endst No: 1430-1450/Qari/Appointment /Ad hoc/NTS dated: 28.02.2015
15.	Rahat Khan	Bakht Zaman	GCMHS Timergara	01/03/1990	150.61	Endst No: 4086-4111/Qari/Appointment/ Ad hoc/NTS dated: 05.03.2016
16.	Farhad Ali	Abdul Haq	GHS Badwan	02/04/1988	150.18	Endst No: 4086-4111/Qari/Appointment/ Ad hoc/NTS dated: 05.03.2016
17.	Muhammad Israr Khan	Amir Muhammad Khan	GCMHS Timergara	03/06/1988	148.98	Endst No: 4086-4111/Qari/Appointment/ Ad hoc/NTS dated: 05.03.2016
18.	Shakir Ullah	Sakhi Jan	GHSS Gumbat Banda	19/02/1987	147.81	Endst No: 4086-4111/Qari/Appointment/ Ad hoc/NTS dated: 05.03.2016
19.	Majid Mehmood	Fazal Mehmood	GHS Mayar Khadagzai	27/03/1988	147.68	Endst No: 4086-4111/Qari/Appointment/ Ad hoc/NTS dated: 05.03.2016
20.	Aziz Ullah	Muhammad Jan	GHS HAJI ABAD	16/02/1987	147.41	Endst No: 4086-4111/Qari/Appointment/ Ad hoc/NTS dated: 05.03.2016
21.	Ali Akbar	Muhammad Farooq Khan	GHS Darmal Bala	06/03/1990	145.32	Endst No: 4086-4111/Qari/Appointment/ Ad hoc/NTS dated: 05.03.2016
22.	Muhammad Yaqoob Khan	Muhammad Iqbal	GHSS Tawda China	25/01/1988	144.17	Endst No: 4086-4111/Qari/Appointment/ Ad hoc/NTS dated: 05.03.2016
23.	Yasir Khan	Umar Rehman	GHS SADBARKALAY	06/02/1992	136.57	Endst No: 1779-87/Qari/Appointment/Ad hoc/NTS dated: 28.02.2017
24.	Tahir Khan	Sani Gul	GHSS Hayaserai	28/02/1989	132.32	Endst No: 1779-87/Qari/Appointment/Ad hoc/NTS dated: 28.02.2017
25.	Muhammad Islam	Khair Muhammad	GHSS Kambat	09/03/1988	130.96	Endst No: 1779-87/Qari/Appointment/Ad hoc/NTS dated: 28.02.2017
26.	Muhammad Yahya	Muhammad Yousaf	GHS Dapoor Balo Khan	10/02/1987	130.89	Endst No: 1779-87/Qari/Appointment/Ad hoc/NTS dated: 28.02.2017

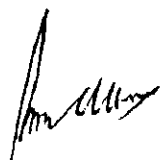
ATTESTED


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Sr	Name	Father Name	Name of School	D.O.B	Score	Appointment order No and dated
27.	Aman Ullah	Hameed Ullah	GHS DARMAL PAYEEN	02/03/1992	126.78	Endst No: 1779-87/Qari/Appointment/Ad hoc/NTS dated: 28.02.2017
28.	Ayaz Muhammad	Wali Muhammad	GHS DHERI KAMBAT	20/02/1988	125.36	Endst No: 6351-58/Qari/Appointment/Ad hoc/NTS dated: 17.05.2017
29.	Muhammad Sher	Sham Sher Khan	GHS Badin	10/02/1991	120.1	Endst No: 7017-19/TT/PET/Qari/Appointment/Ad hoc/NTS dated: 29.05.2017
30.	Sami Ullah	Lutf Ullah	GHS Shalkani	13/06/1982	146.98	Endst No: 13535-35/Qari/Appointment/Ad hoc/NTS dated: 10.10.2017
31.	Amir Habib Shah	Amir Hatam	GHSS Luqman Banda	15/01/1983	148.48	Endst No: 13535-38/Qari/Appointment/Ad hoc/NTS dated: 10.10.2017
32.	Farid Ullah	Bahri Karam	GHS Safarai Khall	13/03/1980	147.81	Endst No: 13535-38/Qari/Appointment/Ad hoc/NTS dated: 10.10.2017
33.	Aziz Ullah	Shakir Ullah	GHS Shahi	02/02/1982	147	Endst No: 13537-38/Qari/Appointment/Ad hoc/NTS dated: 10.10.2017

TERMS & CONDITIONS

1. Their services shall be governed by the Khyber Pakhtunkhwa Civil Servants Act, 1973, the Khyber Pakhtunkhwa (Appointment, Deputation, Posting & Transfer of Teachers, Lecturers, Instructors & Doctors) Regulatory Act, 2011, and such rules and regulations as may be issued from time to time by the government.
2. Their pay shall be released subject to verification of academic documents/testimonials from the concerned Board/University by the District Education Officer Concerned.
3. Their services shall be considered regular and they shall be eligible for pension/deduction of GP fund in terms of the Khyber Pakhtunkhwa Civil Servants Act, 1973 as amended in 2013.
4. Their services are liable to termination on one month prior notice from either side. In case of resignation without notice, their one month pay/allowances shall be forfeited to the Government treasure.
5. They shall possess the same qualification and experience required for a regular post.
6. They shall have not resigned from their services or terminated from services on account of misconduct, inefficiency or any other ground before commencement of this ACT. The DDO concerned should ensure this condition before the drawal of their pay as regular servants.
7. Their regularization shall not affect the promotion quota of existing holders of posts in respective service cadres.
8. They shall rank junior to all other employees belonging to the same cadre who are in service on regular basis on the commencement of this Act and shall also rank junior to such other persons if any, who, in pursuance of the recommendation of the Khyber Pakhtunkhwa Public Service Commission made before the





(11)

- commencement of this ACT are to be appointed to the cadre, irrespective of their actual date of appointment.
9. Their seniority shall be determined on the basis of their continuous service in cadre, provided that if the date of continuous service in the case of two or more employees is the same, the employees older in age shall rank senior to the younger one.
 10. Errors and omissions will be acceptable within the specified period.

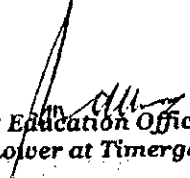
(Hafiz Dr. Muhammad Ibrahim)
District Education Officer (Male)
Dir Lower at Timergara.

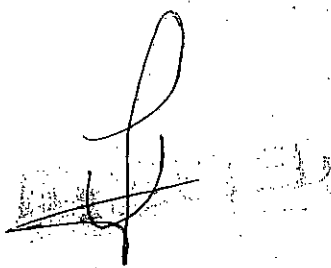
Endst: No. 2224-33

Dated Timergara the : 07/03/2018.

Copy forwarded for information and necessary action to the: -

1. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
2. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Nazim Dir Lower.
4. Deputy Commissioner Dir Lower.
5. District Accounts Officer Dir Lower.
6. Dy: District Education Officer Dir Lower.
7. Principal/Headmaster concerned.
8. The B&AO Local Office
9. The candidates concerned.
10. Master File.


District Education Officer (Male)
Dir Lower at Timergara.



~~12~~

"D"

12

J
ATTESTED

H
ATTESTED

(12)

**OFFICE OF THE DISTRICT EDUCATION OFFICER
MALE DIR UPPER**

OFFICE ORDER.

I am directed to grant saction for protection of pay in respect of following PSTs Appointed on Adhoc basis vide this office Notification No.8572-79 Dated 03/05/2014.No.9411-14 Dated 04/0/2014 No.960/5 dated 12.03.2015, and No.313-18 dated 05.03.2016 respectively and after that regularized against PST post from the date of their initial appointment. Before their appointment as PSTs. They were Adhoc employees of Education Department as PST's w.e.f 03.05.2014 to 03.05.2017 without any break of service Hence, they are hereby considered as regular employees from the date of their 1st appointment with all benefit as admissible to them under the rules.

S.#	Name & Designation	School	1 st appointment as PST	Date of re-appointment as PST	Date regularization	Remarks
01	Ismail Khan PST	GPS, Loi Bba	03.05.2014	05.03.2016	21.03.2018	Pay protected
02	Toti Rehman PST	GPS, Bin (P) Barawal	03.05.2014	03.05.2017	-do-	-do-
03	Irshad Ahmad PST	GPS Kass Chaper	03.05.2014	03.05.2017	-do-	-do-
04	Ayan Ullah PST	GPS, Umralai (B)	04.08.2014	03.05.2017	-do-	-do-
05	Imran Ullah PST	GPS Chukiatan	12.03.2015	03.05.2017	-do-	-do-
06	Sher Rehman PST	GPS, Bekarey	12.03.2015	03.05.2017	-do-	-do-
07	Inayatur Rehamn PST	GPS, S.S Khail	12.03.2015	05.03.2016	-do-	-do-
08	Ibrahim Khan PST	GPS Samai Viari	12.03.2015	05.03.2016	-do-	-do-
09	Muhammad Ilyas	GPS, Bin Berarai	12.03.2015	03.05.2017	-do-	-do-
10	Farhad Khan PST	GPS, Malook Banda	12.03.2015	07.03.2016	-do-	-do-
11	Majeed Ullah PST	GPS Gul Shai Dheri Wari	12.03.2015	05.03.2016	-do-	-do-
12	Dayeem Khan, PST	GPS Umralai Bala	06.03.2016	03.05.2017	-do-	-do-
13	Fakhri Alam PST	GPS, Umralai (P)	06.03.2016	03.05.2017	-do-	-do-
14	Rahat Khan PST	GPS, Kolkai	06.03.2016	03.05.2017	-do-	-do-

Note: Necessary entry to this effect should be made in their service book accordingly.

-----SD-----
(MUHAMMAD ASHRAF)
DISTRICT EDUCATION OFFICER
MALE DIR UPPPER

No.7243-47/E.No.120/DEO(M)/Dir Upper

Dated Dir the 29/03/2022.

Copy forwarded to the:-

01. District Accounts Officer Dir Upper.
02. Sub Divisional Education Officer Male concerned.
03. EMIS Local office.
04. Official concerned.
05. Master File.

DY: DISTRICT EDUCATION OFFICER
MALE DIR UPPER

~~ATTESTED~~



(75) (137)

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

Dir Upper (Phone # 0944-881400) E-mail: deomdirupper@gmail.com

OFFICE ORDER.

Sanction for protection of pay in respect of the following Teachers, Under, Rule 10 (1) of pay revision rules and finance department letter No. FD (PRC): 197 Dated: 16/3/1999, & F.No.7(9)R-1/2012-Islamabad, the 31st May, 2013 Finance Division Regulations wing & F.No.7(9)R-U/2012-1388 dated 6th March, 2014, No FD/SGSR 2014 Peshawar dated 6th Feb, 2014 is crystal clear regarding the subject case; there is no break in their previous & current regular service then their pay are protected and previous services are automatically counted. They are hereby considered as regular employee from the date of their 1st initial appointment with all benefits as admissible under the rules.

S. #	Name & Desig:	School	1 st Appointment as	Date of appointment as	Regularized from	Remarks
01	Ala ur Rahman SST	GHS Shinkarl	SST-NO.3987, dt.30-11-2015	SST-No.4878-84 dt.28-04-2017	30-11-2015	
02	Umar Farooq SST	GCMIIS Dir	SST-No.3987-93 dt.30-11-2015	SST-No.4878-84 dt.28-04-2017	30-11-2015	
03	Zia Ullah SST	GHSS Warf	SST No.3987-93 dt.30-11-2015	SST-No.4878-84 dt.28-04-2017	30-11-2015	
04	Mohammad Ishfaq SST	GHS Ganshal	CT No.3367-74 dt.15-06-2015	SST-No.2969-75 dt.23-04-2018	15-06-2015	
05	Abdul Haseeb SST	GHSS Wari	SST No.3987-93 dt.30-11-2015	SST-No.4878-84 dt.28-04-2017	30-11-2015	
06	Salim Ullah SST	GHS Karkabanj	SST No.3987-93 dt.30-11-2015	SST-No.4878-84 dt.28-04-2017	30-11-2015	
07	Syyed Gauhar Jamal CT	GMS Bandan	CT No.3367-74 dt.15-06-2015	CT No.1698-1705 dt.28-03-2017	15-06-2015	
08	Imran Khan SST	GHSS Gandlgar	PST No.8572-79 dt.03-05-2014	SST-4100-06 dt.30-11-2015	03-05-2014	
09	Sharif Ullah SST	GHS Jalgram	CT No.981-88 dt.12-03-2015	SST-No.4878-84 dt.28-04-2017	12-03-2015	
10	Syyed Fozal Ghani SST	GHSS Barawal Bandl	SST No.4913-20 dt.30-04-2014	SST-No.4878-84 dt.28-04-2017	30-04-2014	
11	Badshah Sardar SST	GCMIIS Dir	CT No.8619-25 dt.03-05-2014	SST-No.4878-84 dt.28-04-2017	03-05-2014	
12	Saeedullah CT	GHS Kothay	PST No.968-75 dt.12-03-2015	CT No.3876-83 dt.29-05-2017	12-03-2015	
13	Asad Ullah CT	GMS Dam jabber	PST-No.434-40 dt.05-03-2016	CT No.4643-50 dt.23-06-2017	05-03-2016	
14	Mohibullah SST	GHS Darora	SST No.4913-20 dt.30-04-2014	SST-No.4878-84 dt.28-04-2017	30-04-2014	
15	Alta-ur-Rahman SST	GHSS Gansseer	SST No.4913-20 dt.30-04-2014	SST-No.4878-84 dt.28-04-2017	30-04-2014	
16	Jamil Ullah SST	GHS Darora	SST No.4913-20 dt.30-04-2014	SST-No.4878-84 dt.28-04-2017	30-04-2014	
17	Suhaib Ahmad SST	GHSS Usharl	SST No.4913-20 dt.30-04-2014	SST-No.4878-84 dt.28-04-2017	30-04-2014	
18	Uzair Khan SST	GHS Bandl	SST No.2084-91 dated 30-04-2014	SST-No.4878-84 dt.28-04-2017	30-04-2014	
19	Fozal Hayat SST	GHS Karkabanj	PST No.5030-35 dated 20-07-2011, SST No. 2084-91 dated 30-04-2014	SST No.4875-84 dated 28-04-2017	30-04-2014	
20	Shakeel Khan SST	GHS Shinkarl	PST No.4331-37 dated 17-11-2006, SST No. 2084-91 dated 30-04-2014	SST No.4913-20 dated 28-04-2017	30-04-2014	
21	Sardar Badshah CT	GHS Gansseer	PST No.8383-91 dated 24-05-2014, CT No.1698-1705 dated 28-03-2017	CT No.1698-1705 dated 28-03-2017	24-05-2014	
22	Gul Muhammad CT	GHS Karkabanj	PST No.5030-35 dated 20-07-2011, CT order No.8619-25 dated 03-05-2014	CT No.206-46 dated 05-03-2016	03-05-2014	
23	Husanullah CT	GMS Damjabber	PST Order No. 8572-79 dated 03-05-2014, CT No.3876-83 dated 29-05-2017	CT Order No.3876-83 dated 29-05-2017	03-05-2014	
24	Shahidullah CT	GHSS Akhgram	PST Order No.8572-79 dated 03-05-2014	CT Order No.1698-1705 dated 29-03-2017	03-05-2014	
25	Alamgir Shah CT	GHS Darora	CT Order No.206-46 dated 05-03-2016	CT Order No.4643-50 dated	05-03-2016	

District Education Officer
Male Dir Upper

ATTESTED

26	Imamulhik DAM	GMS Belanzal	SST Order No. 9411-14 dated 30-06-2014	DAM Order No. 1468-73 dated 17-01-2018	30-06-2014
27	Muhammad Shualb SST	GISS Gamseer	SST Order No. 3987-93 dated 30-11-2015	DAM Order No. 4876-84 dated 28-04-2017	30-11-2015
28	Naik Wali SST (IT)	GIS Darora	CT order No. 981-88 dated 12-05-2015	SST IT No. PM-IT/L&SI/1-3-300-IT-Male/2016	12-05-2015
29	Muhammad Yaqub SST	GMS Belanzal	PST order No. 5030-35 dated 30-07-2011	SST (G) order No. 2084-91 dated 30-04-2014	30-07-2011

Note: Necessary entry to this effect should be made in their Service Books accordingly.

DISTRICT EDUCATION OFFICER (M)
DIR UPPER

Endst No. 1264-66 / F.No.52/DEO (M)/Estb (S)
Copy forwarder for information to the:-

Dated: 8/5/2019

- 01- District Accounts Officer Dir Upper.
- 02- Principal/Head Master concerned.
- 03- Official concerned.

DISTRICT EDUCATION OFFICER (M)
DIR UPPER

DEO (M) DIR UPPER

ATTESTED

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OFFICE OF THE DISTRICT EDUCATION OFFICER (M) ABBOTTABAD.



☎ 0992-9310102, 0992-330131
✉ amrabbottabad@yahoo.com

GRANT OF PAY PROTECTION

In pursuance of Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department Notification No. SC(S) F/E&SED/3-2/2018/SST/ Contract dated 16-02-2018 and Govt. of Finance Department Circular No. FD/(SOK-1) 12-7/2014 dated 06-02-2014 read with rule FR-22 (b) and in the light of Notification issued by the Director, E&SED Khyber Pakhtunkhwa Peshawar vide No.6842-6942/F.No.14/SST (M) Pay Protection dated 25-01-2019 Pay Protection towards their past/previous service rendered in respect of following SSTs is hereby allowed, subject to the condition that there is no break/interruption between their previous & current regular service under Rule FR-23.

S. No.	Name/Designation/School	1st Appointment as	Date of Appointment as	Allowed Pay Protection w.e. from:
1	Mr. Shafique Hussain Shah SST (B/C) GHSS Bandi Dhundan Abbottabad.	SST (B/C) vide Endst. No.3919-25 dated 30-11-2015	SST (B/C) Vide Endst. No. 2059-61 dated 26-07-2017	01-12-2015
2	Mr. Muhammad Nisar SST (B/C) GHSS Hakote Abbottabad.	IST vide Endst. No. 7579-7680 dated 15-10-2014.	SST (B/C) Vide Endst. No. 4272-78 dated 25-04-2017.	16-10-2014
3	Mr. Muneez-ul-Haq SST (M/P) GHSS Nawanshehr Abbottabad.	CT Vide Endst. No. 2907-12 dated 05-05-2014.	SST (M/P) Vide Endst. No. 4272-78 dated 25-04-2017.	06-05-2014
4	Mr. Wasim Khan SST (B/C) GHSS Nawanshehr Abbottabad	SST (B/C) vide Endst. No.3919-25 dated 30-11-2015	SST (B/C) Vide Endst. No. 4272-78 dated 25-04-2017	01-12-2015
5	Mr. Muhammad Mohtasim Ali Abbasi SST (M/P) GHSS Phallah Abbottabad.	CT Vide Endst. No. 1854-60 dated 14-03-2015.	SST (M/P) Vide Endst. No. 4272-78 dated 25-04-2017.	16-03-2015
6	Hafiz Muhammad Amir Abbasi SST (G) GHSS Ghanbeer Abbottabad.	AT vide Endst. No.3034-39 dated 10-05-2014.	SST (G) Vide Endst. No. 4272-78 dated 25-04-2017.	12-05-2014
7	Mr. Muhammad Sajid SST (B/C) GHSS No.3 Abbottabad.	SST (B/C) vide Endst. No.3919-25 dated 30-11-2015	SST (B/C) Vide Endst. No. 4272-78 dated 25-04-2017.	01-12-2015
8	Mr. Umar Farooq SST (B/C) GHSS Rajoya Abbottabad.	CT Vide Endst. No.1854-60 dated 14-03-2015	SST (B/C) Vide Endst. No. 4272-78 dated 25-04-2017.	16-03-2015
9	Mr. Zaun Akhtar, SST (M/P) GHSS Rajoya Abbottabad.	SST (M/P) vide Endst. No. 3919-25 dated 30-11-2015	SST (M/P) Vide Endst. No. 4272-78 dated 25-04-2017.	07-12-2015
10	Mr. Waqar Gul, SST (G) GHSS Sumandar Kallar A/Abad.	CT Vide Endst. No. 2907-12 dated 05-05-2014.	SST (G) Vide Endst. No. 4272-78 dated 25-04-2017.	14-05-2014
11	Chaudary Waqar, SST (B/C) GHSS Mastanabad A/Abad.	SST (B/C) vide Endst. No.3919-25 dated 30-11-2015	SST (B/C) Vide Endst. No. 4272-78 dated 25-04-2017.	01-12-2015
12	Mr. Muhammad Umar Javed SST (B/C) GHSS No.4 Abbottabad.	SST (B/C) vide Endst. No.3919-25 dated 30-11-2015	SST (B/C) Vide Endst. No. 4272-78 dated 25-04-2017.	01-12-2015

**DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD.**

Endst. No. 5154/SC/7/23-1/SSTs/Pay Protection

Dated: 19-09-2020

Copy forwarded for information & necessary action to:

1. The Director Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar.
2. The District Accounts Officer, Abbottabad.
3. The Principals/Headmasters of concerned GHSS/GHS.

(Handwritten signatures and initials)

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) ABBOTTABAD

0992-9310102, 0992-330131

ernisabbottabad@yahoo.com**GRANT OF PAY PROTECTION**

In pursuance of Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department Notification No. SO(S) F/E&SED/3-2/2018/SIT/ contract dated 16.02.2018 and Govt. of Finance Department Circular No. FD/(SOR-I) 12-7/2014 dated 06.02.2014 read with rule FR-22 (b) and in the light of Notification issued by the Director E&SED Khyber Pakhtunkhwa Peshawar vide No. 6842-6942/F.No.14/SST (M) Pay Protection dated 25-01-2019 Pay Protection towards their post/previous service rendered in respect of following SSTs is hereby allowed subject to the condition that there is no break/ interruption between their previous & current regular service under Rule FR-23.

S.N o.	Name/Designation/School	1 st Appointment as	Date of Appointment as	Allowed pay Protection w.e. from
1.	Mr. Shafique Hussin Shah SST (B/C) GHS Bandi Dhundan Abbottabad	SST (B/C) vide Endst: No.3919-25 Dated 30-11-2015	SST (B/C) Vide Endst: No. 2059-64	01-12-2015
2.	Mr. Muhammad Nisar SST (B/C) GHS Bakote Abbottabad.	1 st Vide Endst: No. 7579-7686 Dated 15-10-2014	SST (B/C) Vide Endst: No.4272-78 Dated: 25.04.2017	16-10-2014
3.	Mr. Muneer-Ul-Haq SST (M/P) GHSS Nawanshehr Abbottabad	CT Vide Endst: No. 2907-12 Dated 25.04.2017	SST (M/P) Vide Endst: No.4272-78 Dated 25.04.2017.	06-05-2014
4.	Mr. Waseem Khan SST (B/C) GHSS Nawanshehr Abbottabad.	SST (B/C) Vide Endst: No.3919-25 Dated 30.11.2015	SST (B/C) Vide Endst: No. 4272-78 Dated 25.04.217	01-12-2015
5.	Mr. Muhammad Mohtasim Afzal Abbasi SST (M/P) GHS Phallah Abbottabad.	CT Vide Endst: No. 1854-60 dated: 14.03.2015.	SST (M/P) Vide Endst: No. 4272-78 Dated 25.04.217	16-03-2015
6.	Hafiz Muhammad Amir abbasi SST (G) GHS Ghanbeer Abbottabad.	AT Vide Endst: No. 3034-39 dated: 10.05.2014	SST (G) Vide Endst: No. 4272-78 Dated 25.04.217	12-05-2014
7.	Mr. Muhammad Sajid SST (II/C) GHS No.3 Abbottabad	CT Vide Endst: No. 1854-60 dated: 14.03.2015.	SST (B/C) Vide Endst: No.4272-78 Dated: 25.04.2017	01-12-2015
8.	Mr. Umer Farooq, SST (B/C) GHS Rajoya Abbottabad.	CT Vide Endst. No.1854-60 Dated 14.03.2015	SST (B/C) Vide Endst: No.4272-78 Dated: 25.04.2017	16-03-2015
9.	Mr. Zauq Akhtar, SST (M/P) GHS Rajoya Abbottabad.	SST (M/P) vide Endst: No. 3919-25 Dated 30.11.2015	SST (M/P) Vide Endst: No.4272-78 Dated 25.04.2017.	07-12-2015
10.	Mr. Waqar Gul, SST (G) GHS Sumandar Katha A/Abad.	CT Vide Endst: No. 2907-25 Dated 05.05.2014	SST (G) Vide Endst: No. 4272-78 Dated 25.04.217	14-05-2014
11.	Chaudary Waqas, SST (B/C) GHSS Muslimabad A/Abad.	SST (B/C) vide Endst: No. 3919-25 Dated 30.11.2015	SST (B/C) Vide Endst: No.4272-78 Dated: 25.04.2017	01-12-2015
12.	Mr. Muhammad Umer Javed SST (II/C) GHS No.4 Abbottabad.	SST (B/C) vide Endst: No. 3919-25 Dated 30.11.2015	SST (B/C) Vide Endst: No.4272-78 Dated: 25.04.2017	01-12-2015

DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD

Endst No.5154-56/EB-I/SSTs/Pay Protection.

Dated 19-09-2020

Copy forwarded for information & necessary action to:-

1. The Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. The District Accounts Officer, Abbottabad.
3. The Principals/Headmasters of concerned GHSS/GHS.

[Handwritten Signature]
DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD

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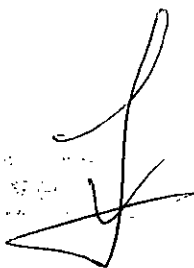
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NOTIFICATION.

In pursuance of Govt. of Khyber Pakhtunkhwa, Elementary & Secondary Education Department Notification No: SO(S/F)E&SED/3-2/2018/SIT/Contract dated 16.02.2018 and Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar Notification No.6842-6942/F.No./SST (M) Pay protection / regularization dated 25.01.2019, and consequent upon regularization of all teachers / employees appointed on "Adhoc /Contract Basis" through NTS during the period /year i.e, 2014/2015/2016/2017 and 2018, (They are allowed "Pay protection" Teachers "in line with Govt: of Khyber Pakhtunkhwa Finance Deptt/ Circular No.FD/(SOR-1)12-7/2014 dated 06.02.2014 with rule FR-22(b). Pay protection is hereby allowed to the following Adhoc/Contract employees/teachers towards their Post/Previous/Service in line with Govt. of Khyber Pakhtunkhwa Finance Department Circular No.FD/(SOR-1)12-7/2014 dated read with rule FR-22(b).

S.No.	NAME OF TEACHER/DESIG: AND SCHOOL	PREVIOUS SERVICE TO BE PROTECTED
1	MR. MUHAMMAD ASIF, CT GMS GUNJ GATE	EDUCATION DEPARTMENT
2	MR. FAWAD ALI DURRANI, CT GSOZCMHSS NO.2 PESHAWAR CITY	EDUCATION DEPARTMENT
3	MR. KAMRAN, CT GHS PAHARI PURA	EDUCATION DEPARTMENT
4	MR. WAJID ALI, CT GHSS DAAG	EDUCATION DEPARTMENT
5	MR. MUHAMMAD JANAS KHAN CT GHS MATHRA	EDUCATION DEPARTMENT
6	MR. MUHAMMAD SAQIB, PET GMS GUL ABAD	EDUCATION DEPARTMENT
7	MR. MUHAMMAD ILYAS CT GHS ZARYAB COLONY	EDUCATION DEPARTMENT
8	MR. SAMI UL HAQ CT GHS LARAMA	EDUCATION DEPARTMENT
9	MR. NABI GUL CT GSHS NO.1 PESHAWAR CITY	EDUCATION DEPARTMENT
10	MR. MALIK FAIZAN CT GSHS NO. PESHAWAR CITY.	EDUCATION DEPARTMENT
11	MR. MUHAMMAD SALMAN, CT GSHSHSS NO.1 PESHAWAR CITY.	EDUCATION DEPARTMENT
12	MR. ASIF ALI, CT GSOZCMHSS NO.2 PESHAWAR CITY.	EDUCATION DEPARTMENT
13	MR. SANA ULLAH, CT GHS SHER BAD	EDUCATION DEPARTMENT
14	MR. ISRAR ULLAH, CT GHS SHER DAD	EDUCATION DEPARTMENT
15	MR. SHIRAZ ASLAM, CT GSOZCMHSS NO.2 PESHAWAR CITY.	EDUCATION DEPARTMENT
16	MR. NAIK RAHMAN CT GSOZCMHSS NO.2 PESHAWAR CITY.	EDUCATION DEPARTMENT
17	MR. SAID WALI KHAN CT GSOZCMHS NO.4 PESHAWAR CITY.	EDUCATION DEPARTMENT
18	MR. WAQAR YOUNAS, CT GSFHCMHS NO.4 PESHAWAR CANTT.	EDUCATION DEPARTMENT
19	MR. DARWESH KHAN CT, GHS TAKHT ABAD	EDUCATION DEPARTMENT
20	MR. TAHMIDDULLAH CT, GHS TAKHT ABAD	EDUCATION DEPARTMENT
21		EDUCATION DEPARTMENT
22		EDUCATION DEPARTMENT
23		EDUCATION DEPARTMENT
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(17)

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA, PESHAWAR.

NOTIFICATION

In pursuance of Government of Khyber Pakhtunkhwa, Elementary & Secondary Education Department Notification No. SO/S/PRO/SED/3-2/2018/SIT/Contract dated 16-02-2018, it is hereby notified for the information of all DEOs E&SE (Male/Female) in Khyber Pakhtunkhwa and future course of action that consequent upon regularization of all teachers/employees appointed on "adhoc/contract basis" through NTS during the period/year from 2014, 2015 & 2017-18 and regularized during 2018. They are allowed "Pay Protection" towards their "past/previous service" rendered by the concerned employees/teachers as "adhoc/contract employees/teachers" in line with Government of Khyber Pakhtunkhwa Finance Department Circular No. FD/(SOR-1)12-7/2014 dated 06-02-2014 read with rule FR 22 (b).

The aforesaid "Pay Protection" is also admissible to those teachers/employees inducted in E&SE Department from other Provincial Departments of Khyber Pakhtunkhwa through proper channel/NOC and subject to the condition that there is no break/interruption between service rendered in other Provincial Department and E&SE Department as admissible under rule FR-23.

All the District Education Officers (Male/Female) in Khyber Pakhtunkhwa are advised that the "Pay Protection" cases of teachers/employees working under their respective Districts may not be referred to this Directorate in future.

6802-6942

(Hafiz Dr. Muhammad Ibrahim)


Director

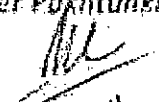
Enclt. No. _____ / F.No. 14/SST (M) Pay Protection/Regularization

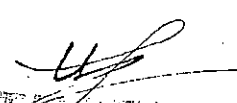
Dated Peshawar the 25/1/2019

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

- 1. All District Education Officers (M/F) in Khyber Pakhtunkhwa.
- 2. All District Accounts Officers in Khyber Pakhtunkhwa.
- 3. PS to Secretary to Govt. of Khyber Pakhtunkhwa E&SE Department.
- 4. Additional Director (Estab) Local Directorate.
- 5. All Deputy Directors (M&F) in Local Directorate.
- 6. All Assistant Directors (M&F) in Local Directorate.
- 7. Officials concerned.
- 8. PA to Director Local Directorate.
- 9. Master File.


Deputy Director (Estab) 23/1/19
Elementary & Secondary Education
Khyber Pakhtunkhwa


23/1/19


ATTACHED



Better Copy

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

NOTIFICATION

In pursuance of Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department Notification No. SO(S)F/E&SED/3-2/2018/SIT/Contract dated 16.02.2018, it is hereby notified for the information of all DEOs E&SE (Male/Female) in Khyber Pakhtunkhwa and future course of action that consequent upon regularization of all teachers/employees appointed on "ad hoc/contract basis" through NTS during the period/year from 214, 2015 & 2017-18 and regularized during 2018. They are allowed "Pay Protection" towards their "past/previous service" rendered by the concerned employees/teachers as "ad hoc/contract employees/teachers" in line with Government of Khyber Pakhtunkhwa Finance Department Circular No. FD/(SOR-1)12-7/2014 dated 06.02.2014 read with rule FR 22 (b).

The aforesaid "Pay Protection" is also admissible to those teachers/employees inducted in E&SE Department from other Provincial Departments of Khyber Pakhtunkhwa through proper channel/NOC and subject to the condition that there is no break/interruption between service rendered in other Provincial Department and E&SE Department as admissible under rule FR.23.

All the District Education Officers (Male/Female) in Khyber Pakhtunkhwa are advised that the "Pay Protection" cases of teachers/employees working under their respective Districts may not be referred to the Directorate in future.

(Hafiz Dr. Muhammad Ibrahim)

Director

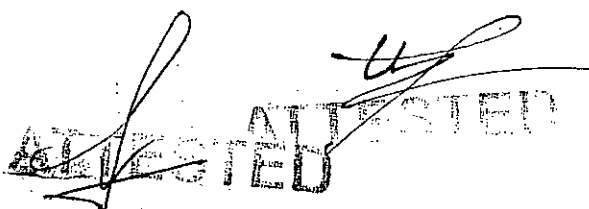
Endst: No.6842-6942/F.No.14/SST (M) Pay Protection/Regularization

Dated Peshawar the 25/ 1/ 2019

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

1. All District Education Officers (M/F) in Khyber Pakhtunkhwa.
2. All District Accounts Officers in Khyber Pakhtunkhwa.
3. PS to Govt. of Khyber Pakhtunkhwa E&SE Department.
4. Additional Director (Estab) in Local Directorate.
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8. PA to Director Local Directorate.
9. Master File.

Deputy Director (Estb)
Elementary & Secondary Education
Khyber Pakhtunkhwa

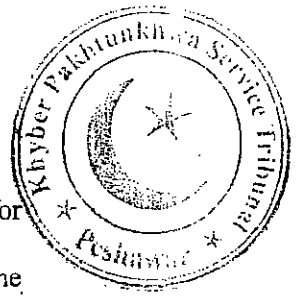
A handwritten signature in blue ink is written over a rectangular stamp that contains the word "REGISTERED" in capital letters. The signature is written in a cursive style.

~~180~~

"E"

183

Service Appeal No. 7364/2021 titled "Ali Akbar Versus Secretary Elementary & Secondary Education Department Khyber, Peshawar and others"



ORDER
27.11.2023


MUHAMMAD AKBAR KHAN, MEMBER (E):- Learned counsel for the appellant present. Mr. Muhammad Jan, District Attorney for the respondents present. Arguments heard and record perused.

02. During the course of arguments, learned counsel for the appellant submitted a copy of office order bearing No. 7293-47/F.No.120/DEO(M)/Dir Upper dated 29.03.2022 wherein the District Education Officer (Male) District, Dir Upper (respondent No. 3) has granted pay protection in respect of fourteen similarly placed employees with effect from their first appointment with all benefits. Since the case of the appellant is the same as that of fourteen employees mentioned in the aforementioned order we, therefore, remit the instant appeal to the respondents for consideration on the analogy of the aforementioned fourteen employees/colleagues of the appellant.


03. The instant appeal is disposed of on the above terms. Consign.

04. Pronounced in open court at Peshawar and given under our hands and seal of the Tribunal on this 27th day of November, 2023.

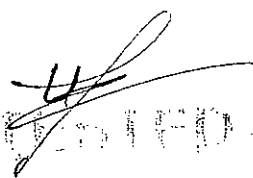

(Rashida Bano)
Member (J)


(Muhammad Akbar Khan)
Member (E)

Kumraullah

Certified

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Date of Presentation of Application 21-3-24
Number of Words 17
Copying Fee 5
Urgent SR
Total 16/-
Name of Copyist _____
Date of Completion 21-3-24
Date of Delivery of Copy 21-3-24


ACCEPTED


ACCEPTED

"F" (193)

To,

The Director E & S Education Department G.P.

Subject:- Departmental Appeal/Representation for Fixation/Granting pay protection to the Appellant from the date of initial Appointment

R/S,


That the appellant is in the employ of your good-self department, and performing duties well efficiently. That appellant was initially appointed after fulfilling all the conditions.

That the during the service of the Appellant your good self department advertised certain post for which the Appellant for the said post through proper channel and accordingly appointed against the said post.

That it is important to mention here that the service of the Appellant was Resubmitted under Resubmission Act 2018, but the pay was not fixed from the initial appointment.

It is therefore humbly requested that on acceptance of this Appeal/Representation the pay of the Appellant may kindly be fixed from the date of First Appointment.

Date 28/12/2023


ATTESTED

Yours obediently

Mr. Anand R

PSt (21), GHS

Phone 287, Dar Laha

200

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. _____/2024

Mr. Iiaquat Ali.....APPELLANT

VERSUS

The DEO Dir LowerRESPONDENT

KNOW ALL to whom these presents shall come that I the undersigned appoint: ***Umar Farooq Mohmand,***
Advocate High Court, Peshawar (herein after called the advocate) to be the Advocate for the ***Mr.***

in the above mentioned case, to do all the following acts, deeds and things or any of them, that is to say :

- 1) To act and plead in the above mentioned case in this court or any other Court in which the same may be tried or heard in the first instance or in appeal or review or execution or in any other stage of its progress until its final decision.
- 2) To sign, verify and present pleadings, appeals, cross-objections, petitions for execution, review, revision, withdrawal, compromise or other petition or affidavits or other documents as shall be deemed necessary or advisable for the prosecution of said case in all its stages.
- 3) To withdraw or compromise in the said case or submit to arbitration any difference or dispute that shall arise touching or in any manner relating to the said case.
- 4) To receive money and grant receipts therefore and to do all other acts and things which may be necessary to be done for the progress and the course of the prosecution of the said case.
- 5) To engage any other legal practitioner authorizing him to exercise the power and authorities hereby conferred on the Advocate whenever he may think fit to do so.

AND I hereby agree to ratify whatever the Advocate or his substitute shall do in the promises.

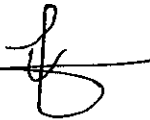
AND I hereby agree not to hold the Advocate or its substitute responsible for the result of the said case and in consequence of his absence from the court when the said case is called up for hearing

AND I hereby that in the event of the whole or any part of the fee agreed by me to be paid to the Advocate remaining unpaid, He shall be entitled to withdraw from the prosecution of the said case until the same is paid.

IN WITNESS WHEREOF I hereunto set my hand to these presents the contents of which have been explained to and understood by me, this ____th day of March, 2024

Waleed
Signature/ thumb impression
of party / parties.

Accepted By



Umar Farooq Mohmand,

Advocate High Court, Peshawar.

Bar Council No:- 14-4822

CNIC No:- 17102-7315460-3

Cell No:- 0313-8901647

Email: umf7890@gmail.com

Waleed Adnan

Advocate High Court, Peshawar.

Muhammad Ayub

Advocate High Court, Peshawar.