

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 4823/2021

BEFORE: MRS. RASHIDA BANO ... MEMBER (J)
MISS FAREEHA PAUL ... MEMBER (E)

Syed Jalal Hussain S/O Syed Zarin Hussain, Presently Serving as SST (General) in GMS Mahora Tehsil Lower District Orakzai.

... (Appellant)

VERSUS

1. Director Elementary & Secondary Education Department Peshawar.
2. District Education Officer (Male), District Orakzai at Hangu.
3. Kausar Ali Shah, Presently serving as SST Science at GMS Starsam Lower Orakzai.
4. Khatib Ali, SST General GHS Suleman Khel.
5. Iqbal Hussain ADEO Lower Orakzai.

... (Respondents)

Mr. Safdar Iqbal Khattak
Advocate

... For appellant

Mr. Asif Masood Ali Shah
Deputy District Attorney

... For respondents

Date of Institution.....15.03.2021

Date of Hearing.....18.03.2024

Date of Decision.....18.03.2024

JUDGMENT

RASHIDA BANO, MEMBER (J): The instant service appeal has been instituted under section 4 of the Khyber Pakhtunkhwa Service Tribunal, Act 1974 with the prayer copied as below:

R

SCANNED
KPST
Peshawar

“On acceptance of this appeal, that in the impugned notification dated 07.12.2020 the transfer/posting of the appellant GMS Mahora instead of the nearest school i.e. Suleman Khel, Starsam is against the law and facts, hence liable be set aside.”

2. Brief facts of the case, as given in the memorandum of appeal, are that the appellant was appointed as PST in GPS Kuraz and was performing his duty with the entire satisfaction of his superior. Appellant being ill, submitted an application to respondent No.2 for his transfer to nearest school i.e Suleman Khel. The post of the appellant was upgraded from BPS-15 to BPS-16 and was transferred from GPS Kuraz to GMS Mahura vide notification dated 07.12.2020. Feeling aggrieved, he filed departmental appeal, which was not responded, hence the instant service appeal.

3. Respondents were put on notice who submitted written replies/comments on the appeal. We have heard the learned counsel for the appellant as well as the learned Deputy District Attorney and perused the case file with connected documents in detail.

4. Learned counsel for the appellant argued that posting transfer notification of the appellant at GMS Mahura instead of GHS Starsang or Guleman Khel is against the law, facts, norms of natural justice, hence not tenable and liable to be set aside; that appellant is cardiac patient which fact was not considered by respondent while issuing posting/transfer order to far flung areas which show malafide on his part.

5. Learned Deputy District Attorney contended that the appellant has been treated in accordance with law and rules. He further contended that in accordance with Section-10 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989 desired posting is not the perpetual right of a civil servant and department concerned can transfer any civil servant to serve at the given place as mentioned in the posting/transfer order, while the civil servant cannot refuse compliance. He further argued that the appellant was adjusted in his own Tehsil/District and no inconvenience is caused to him.

6. Perusal of record reveals that appellant was appointed as PST in respondent department on 1/07/2012 who was promoted as SST general BPS 16 vide notification dated 7/12/2022 and posted at GMS Mahora. Appellant submitted application to DEO Orakzai for his transfer to nearest school situated at Suleman Khel due to his illness being cardiac patient which was not responded. It is an admitted fact that appellant was promoted and his posting order was issued after his promotion for actualization of his promotion. It is also pertinent to mention that appellant was transferred not only within district but in his own Tehsil. The appellant has been transferred from one place to the other but in the same station so all the questions of disturbance, dislodging, inconvenience or for that matter violation of any policy are totally ruled out.

RK

7. Moreover the impugned transfer order was issued by Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar and as per rules appellate authority against orders issued by Director is the Secretary and not District Education Officer and hence the appellant filed departmental appeal to an incompetent authority. So, legally speaking, departmental appeal filed by the appellant is also incompetent. Therefore, appeal in hand is not maintainable in accordance with procedure provided in Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 as the requirement under the said section is not complied with in the instant appeal by the appellant.

8. For what has been discussed above, the appeal in hand is dismissed having no force in it. Cost shall follow the event. Consign.

9. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal on this 18th day of March, 2023.*

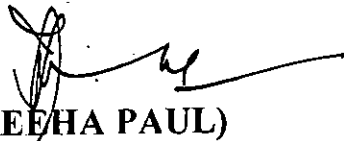

(FAREEHA PAUL)
Member (E)



(RASHIDA BANO)
Member (J)

ORDER
18.03.2024

1. Learned counsel for the appellant present. Mr. Asif Masood Ali Shah learned Deputy District Attorney for the respondents present.
2. Vide our detailed judgement of today placed on file, the appeal in hand is dismissed having no force in it. Cost shall follow the event. Consign.
3. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal on this 18th day of March, 2023.*

SCANNED
K.P.S.T
Peshawar



(FAREEHA PAUL)
Member (E)



(RASHIDA BANO)
Member (J)

Kaleemullah

29.02.2024 1. Learned counsel for the appellant present. Mr. Muhammad Jan learned District Attorney alongwith Mr. Tufail Focal Person for the respondents present.

2. Written reply on behalf of respondent submitted which is placed on file. A copy of the same is handed hand over to the learned counsel for the appellant. Cost of Rs. 5000/- also deposited receipt of which is placed on file. Learned counsel for the appellant sought time in order to go through written reply. Adjourned. To come up for arguments on 18.03.2024 before D.B. P.P given to the parties.


(Fareeha Paul)
Member (E)



(Rashida Bano)
Member (J)


SCANNED
KPSI
Postman
Kaleemullah

01.02.2024

1. Learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney alongwith Mr. Imran, Assistant for the respondents present.
2. Learned Deputy District Attorney requested for adjournment. Adjourned. To come up for arguments on 15.02.2024 before D.B. P.P given to the parties.

SCANNED
BY
RECTOR
Kamranullah



(Muhammad Akbar Khan)
Member (E)



(Rashida Bano)
Member (J)

15.02.2024

1. Learned counsel for the appellant present. Mr. Asif Masood Ali Shah, learned Assistant Advocate General alongwith Mr. Tufail, Focal Person for the respondents present.
2. Learned AAG submitted an application for setting aside ex-parte proceedings initiated against the respondents vide order dated 20.04.2022. Learned counsel for the appellant raised on objection on setting aside ex-parte proceedings and in the interest of justice ex-parte proceedings initiated against the respondents are set aside on payment of cost of Rs. 5000/-. Respondents are directed to submit written reply within two days with a copy to the appellant. To come up for arguments on 29.02.2024 before D.B. P.P given to the parties.

SCANNED
BY
RECTOR
KaleemUllah


(Fareeha Paul)
Member (J)


(Rashida Bano)
Member (J)

*KaleemUllah


Restoration Application No.294/2023

Late Diary

22nd Aug. 2023 1. Later on, learned counsel for applicant appeared and advanced arguments in the instant application. Mr. Muhammad Jan, District Attorney for the respondents present.


2. Learned District Attorney on behalf of the respondents did not raise any objection on acceptance of this application for restoration of appeal. Instant application is for restoration of appeal No.4823/2021 which was dismissed in default on 14.04.2023. Considering the contention of learned counsel for the applicant and in the interest of justice, instant service appeal is restored to its original number. To come up for arguments on 14.12.2023 before D.B. P.P given to the parties.


3. *Pronounced in open Court at Peshawar under our hands and seal of the Tribunal on this 22nd day of August, 2023.*

14.12.2023 1.  Clerk to counsel for the appellant present. Mr. Muhammad Jan
(Salah-Ud-Din) (Kalim Arshad Khan)
Member (J) Chairman
learned District Attorney for the respondent present.

*Mutazem Shah *

2. Lawyers are on strike, therefore, the case is adjourned. To come up for arguments on 01.02.2024 before D.B. P.P given to the parties.


Muhammad Akbar Khan
Member (E)


Rashida Bano
Member (J)

SCANNED
KPST
Peshawar

SCANNED
KPST
Peshawar

18th July, 2023


1. Nobody present on behalf of the petitioner. Mr. Fazal Shah Mohmand, learned Assistant Advocate General for the respondents present.


2. Notice be issued to petitioner and his counsel for argument on restoration application on 22.08.2023 before D.B. P.P given to learned AAG.

*On 15/08/2023,
counsel was informed
telephonically for the date
fixed (22/08/2023)
Fazal
Mohmand*

SCANNED
KPST
Peshawar

*KaleemUllah


(Fareeha Paul)
Member (E)


(Rashida Bano)
Member (J)

22nd August, 2023

1. Clerk of learned counsel for the appellant present. Mr. Muhammad Jan, District Attorney for the respondents present.

2. Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is busy before the Hon'ble Peshawar High Court, Peshawar. Adjourned. To come up for arguments on restoration application on 14.12.2023 before the D.B. Parcha Peshi given to the parties.

(Salah-ud-Din)
Member (Judicial)



(Kalim Arshad Khan)
Chairman


Naeem Amin

29th May, 2023

1. Learned counsel for petitioner present. Mr. Fazal Shah Mohmand, Additional Advocate General for respondents present.
2. Request for adjournment was made on behalf of learned counsel for petitioner. Adjourned. To come up for arguments on restoration application on 09.06.2023 before D.B. P.P given to the parties.

SCANNED
KPST
Peshawar


(Muzammil Akbar Khan)
Member (E)



(Kalim Arshad Khan)
Chairman

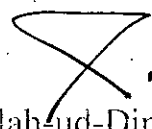
Mutazem Shah

09.06.2023

Clerk of learned counsel for the petitioner present. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Clerk of learned counsel for the petitioner requested for adjournment on the ground that learned counsel for the petitioner is busy in the Hon'ble Peshawar High Court, Peshawar. Adjourned. To come up for arguments on restoration application on 18.07.2023 before the D.B. Parcha Peshi given to the parties.


(Fareeha Paul)
Member (I)


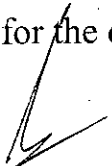
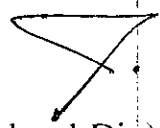

(Salah-ud-Din)
Member (I)

Nozem Amin

FORM OF ORDER SHEET

Court of _____

Restoration Application No. 294/2023

| S.No. | Date of order Proceedings | Order or other proceedings with signature of judge |
|-------|---------------------------|---|
| 1 | 2 | 3 |
| 1 | 11.05.2023 | <p>The application for restoration of appeal 4823/2021 submitted today by Mr. Safdar Iqbal Khattak Advocate. It is fixed for hearing before Division Bench at Peshawar on <u>16/05/2023</u>. Original file be requisitioned.</p> <p>By the order of Chairman</p> <p> For REGISTRAR</p> |
| | 16.05.2023 | <p>Nemo for the petitioner.</p> <p>Notice be issued to the respondents and to come up for reply/comments as well as arguments on restoration application before the D.B on 29.05.2023. Original record also be requisitioned for the date fixed.</p> <p>Notice also be issued to the petitioner as well as his counsel for the date fixed.</p> <p> (Muhammad Akbar Khan) Member (E)</p> <p> (Salah-ud-Din) Member (J)</p> |

SCANNED
Peshawar

SCANNED
H. ST
Peshawar

On 26/05/2023,
counsel was informed
telephonically for the
date fixed (29/05/23)
Mr. Mohammi

29th Mar, 2023

Clerk of learned counsel for the appellant present. Mr. Muhammad Jan, District Attorney for the respondents present.

Clerk of learned counsel for the appellant seeks adjournment on the ground that learned counsel is not available today. Last chance is given to the appellant to argue the case on the next date. To come up for arguments on 14.04.2023 before D.B. P.P given to the parties.

SCANNED
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Peshawar



(Salah Ud Din)
Member (Judicial)



(Kalim Arshad Khan)
Chairman

14th April, 2023

1. Nobody is present on behalf of the appellant. Mr. Fazal Shah Mohmand, Additional Advocate General for the respondents present.

2. Called several times till last hours of the court but nobody turned up on behalf of the appellant. In view of the above, the instant appeal is dismissed in default. Consign.

3. *Pronounced in open court at Peshawar and given under our hand and seal of the Tribunal on this 14th day of April, 2023.*



(Muhammad Akbar Khan)
Member (E)



(Kalim Arshad Khan)
Chairman

31.05.2022

Junior to counsel for the appellant present.

Muhammad Riaz Khan Paindakheil learned Assistant Advocate General for respondents present.

Former made a request for adjournment as senior counsel for the appellant is not available today. Adjourned. To come up for arguments on 10.08.2022 before D.B.



(Fareeha Paul)
Member(E)



(Rozina Rehman)
Member (J)

10-8-2022

Proper DB not available the case is adjourned to come up for the same as before on 2-11-2022


Reader

02.11.2022

Learned counsel for the appellant present. Mr. Muhammad Jan, District Attorney for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he is proceeding to attend the funeral of his relative. Adjourned. To come up for arguments before the D. B on 26.12.2022.



(Mian Muhammad)
Member (E)



(Salah-ud-Din)
Member (J)

26.12.2022


Due to winter vacation the case is adjourned to 29.03.2023 before the same.


Reader

06.01.2022

Nemo for the appellant. Mr. Kabirullah Khattak,
Additional Advocate General for the respondents present.

Reply/comments on behalf of respondents are still
awaited. Learned Additional Advocate General sought time for
submission of reply/comments. Another last opportunity is
granted to respondents to furnish reply/comments on or before
next date, failing which their right to submit reply/comments
shall be deemed as struck off by virtue of this order. To come up
for arguments before the D.B on 20.04.2022.



(Atiq-Ur-Rehman Wazir)
Member (E)

20th April, 2022

Counsel for the appellant present. Mr. Muhammad
Riaz Paindakhel, Asstt. AG present. Let fresh notices be issued
to respondents No. 3 & 5 for submission of written
reply/comments before the date fixed.

On previous date last opportunity was given to the
official respondents for submission of written reply/comments,
failing which their right to submit reply has been deemed to be
struck off by virtue of that order. Neither written reply of the
official respondents received nor any responsible representative
is in attendance. As their right to submit reply has already
been deemed to have been struck off, therefore, the appeal is
fixed for final arguments on 31.05.2022 before D.B.



Chairman

14.09.2021

Counsel for the appellant present. Preliminary arguments heard. Record perused.

Points raised need consideration. Instant appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notice be issued to respondents for submission of written reply/comments in office within 10 days of the receipt of notices, positively. If the reply/comments are not submitted within the stipulated time, the office shall submit the file with a report of non-compliance. File to come up for arguments on 5/10/2021 before D.B.

Appellant Deposited
Security & Process Fee

27/8/21

(Rozina Rehman)
Member (J)

05.10.2021

Appellant in person and Mr. Usman Ghani, District Attorney for the respondents present.

Reply/comments have not been submitted despite extension of time. Last chance is given to the respondents for submission of reply within 10 days in office, failing which the right of the respondents for reply shall be deemed as struck off. To come up for arguments on 06.01.2022 before the D.B.

(Mian Muhammad)
Member(Executive)




Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 4823 /2021


| S.No. | Date of order proceedings | Order or other proceedings with signature of judge | | |
|-------|---------------------------|--|----------|--|
| 1 | 2 | 3 | | |
| 1- | 14/04/2021 | <p>The appeal of Syed Jalil Hussain resubmitted today by Mr. Safdar Iqbal Khattak Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>2-</p> | 27/05/21 | <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>07/06/21</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>The Worthy Chairman is on leave, therefore, case to come up for preliminary hearing on 14.09.2021 before S.B.</p> <p style="text-align: right;"> Reader</p> |
| | 07.06.2021 | | | |

The appeal of Syed Jalil Hussain SST General in GMS Mahora Tehsil Lower District Orakzai received today i.e. on 15/03/2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Address of respondent no.4 is incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 3- Appeal has not been flagged/marked annexures' marks.
- 4- Annexures of the appeal may be attested.

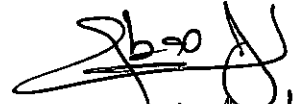
No. 545 /S.T,

Dt. 16/03 /2021


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Safdar Iqbal Khattak Adv. Pesh.

Re-Submitted to remove the objections raised by the office.


12/4/2021

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

SCANNED
KPST
Peshawar

Service Appeal No. _____/2021

Syed Jalal Hussain.....Appellant

VERSUS

Govt. of K.P. through Director E&S and others...Respondents

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| 9. | Wakalatnama | | |

Through

Appellant

Hussain
15/12/2021
Safdar Iqbal Khattak
Advocate High Court
Cell: 0300-5980549

Dated:

①

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

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 3603

Dated 15/3/2021

Service Appeal No. 4823 /2021

Syed Jalal Hussain son of Syed Zarin Hussain
Presently serving as S.S.T. General in Govt. Middle School
Mahora Tehsil Lower District Orakzai **Appellant**

VERSUS

- 1) Govt. of Khyber Pakhtunkhwa through Director Elementary and Secondary Education, G.T. Road, Peshawar.
- 2) District Education Officer, District Orakzai at Hangu.
- 3) Kausar Ali Shah, presently serving as SST science at Govt. Middle School Starsam Lower Orakzai.
- 4) Khatib Ali, SST General Govt. High School Suleman Khel. Village Marai Balla P/O Marai Bala Dist Kohat
- 5) Iqbal Hussain ADEO Lower Orakzai..... **Respondents**

**APPEAL U/S 4 OF SERVICE TRIBUNAL
ACT, 1974 AGAINST THE NOTIFICATION
DATED 07.12.2020.**

Respectfully Sheweth:

1) That the appellant was appointed as PST in Govt. Primary School Kuraz, and performed his duty regularly, punctually since long.

2) That vide notification dated 07.12.2020, the post of the appellant was upgraded from BPS-15 to BPS-16 and was transferred from GPS Kuraz to GMS Mahura. (Copy attached)

Filed to-day
Registrar
15/3/2021

Re-submitted to-day
and filed.
Registrar
14/4/2021

- 3) That when the above fact came into the knowledge of the appellant, he submitted an application to the respondent No.2 that he being ill and be appointed at nearest school i.e. Suleman Khel. (Copy of the application and medical document are attached).
- 4) That after issuing the above notification dated 07.12.2020, the appellant was transferred and posted at GMS Mahora.
- 5) That after issuing the impugned notification dated 07.12.2020, the appellant on 12.12.2020 again submitted another application to the respondent No.2, against his posting at GMS Mahura, but of no fruitful result, hence the instant appeal.
- 6) That the appellant being aggrieved from the impugned notification dated 07.12.2020 wherein the appellant is posted/ transferred at GMS, Mahura instead of GMS Suleman Khel or Govt. High School Starsang, and came to this hon'ble Tribunal with the following amongst other grounds:

GROUND

- A. That posting/ transfer order of the appellant at GMS Mahura instead of GHS Starsang or Suleman Khel is against the law, facts and circumstances of the case hence liable to be struck down.
- B. That newly appointed respondent No.3, is a science teacher and as posted on general post at GHS Starsang, which itself against the law.
- C. That as stated in body of the appeal that the appellant is cardiac patient but this fact was also ignored by the respondent No.2, which shows malafide on the part of respondent No.2

- D. That as the appellant was posted/ transferred to far flung area instead of vacant nearest school i.e. Starsam, Suleman Khel.
- E. That any additional ground will be raised at the time of arguments.

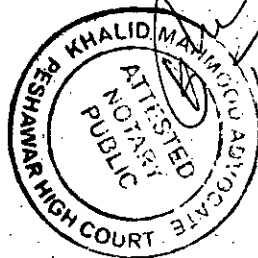
It is therefore, humbly prayed that, on acceptance of this appeal that in the impugned notification dated 07.12.2020 the transfer/ posting of the appellant Govt. Middle School Mahora instead of the nearest school i.e. Suleman Khel, Starsam is against the law and facts, hence liable to be reversed.

[Signature]
Appellant

Through *[Signature]*
Safdar Iqbal Khattak
Advocate High Court

VERIFICATION

It is verified that, the contents of the appeal are true and correct to the best of my knowledge and belief and nothing material has been concealed from this hon'ble Tribunal.



[Signature]
Deponent

4

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

Service Appeal No. _____/2021

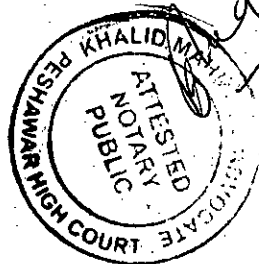
Syed Jalal Hussain.....Appellant

VERSUS

Govt. of K.P. through Director E&S and others...Respondents

AFFIDAVIT

I, Syed Jalal Hussain son of Syed Zarin Hussain Presently serving as S.S.T. General in Govt. Middle School Mahora Tehsil Lower District Orakzai (appellant), do hereby affirm and declare that the contents of accompanying **Service appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this hon'ble Tribunal.



[Signature]
Deponent
CNIC 21603-4893202-9
Cell: 0300-5980599

5

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

Service Appeal No. _____/2021

Syed Jalal Hussain.....Appellant

VERSUS

Govt. of K.P. through Director E&S and others....Respondents

ADDRESSES OF PARTIES

APPELLANT

Syed Jalal Hussain son of Syed Zarin Hussain
Presently serving as S.S.T. General in Govt. Middle School
Mahora Tehsil Lower District Orakzai

RESPONDENTS

- 1) Govt. of Khyber Pakhtunkhwa through Director Elementary and Secondary Education, G.T. Road, Peshawar.
- 2) District Education Officer, District Orakzai at Hangu.
- 3) Kausar Ali Shah, presently serving as SST science at Govt. Middle School Starsam Lower Orakzai.
- 4) Khatib Ali, SST General Govt. High School Suleman Khel. village Marai Bala P/o Marai Bala BISTI. Leohat
- 5) Iqbal Hussain ADEO Lower Orakzai


Appellant

Through

Safdar Iqbal Khattak
Advocate High Court



DIRECTORATE OF ELEMENTARY &
SECONDARY EDUCATION KHYBER
PAKHTUNKHWA
PHONE:
FAX:

Notification

In pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.SO(PE)/4-5/SSRC/Meeting/2013/Teaching Cadre dated 24th July, 2014 and recommendations of the Departmental Promotion Committee, the following SCTs/CTs, SDMs/DMs, SATs/ATs, STTs/TTs, Senior Qaris/Qaris, PSHTs/SPSTs/PSTs of District Orakzai, are hereby promoted to the post of SST (Bio-Chem), SST (Phy-Maths), SST (General) and posted in the schools noted against each in BPS-16 (Rs. 18910-1520-64510) plus usual allowances as admissible under the rules on regular basis under the existing policy, on the terms and conditions given below, with immediate effect in the interest of public service.

1 SCT/CT TO SST(General) BPS-16:

| S.N. No. | Sen No | Name | School | DOB | D of App as Regular CT | Quali | Name of School where posted |
|----------|--------|--------------------|------------------|------------|------------------------|----------|-----------------------------|
| 1 | 16 | Muhammad Sadiq | GHS Mishti Bazar | 3/4/1971 | 20/2/2013 | BA/B.Ed | GMS Qasim Khel |
| 2 | 17 | Kunail Shah | GHS Sra Mela | 7/11/1965 | 20/2/2013 | BA/B.Ed | GMS Parh Tangi |
| 3 | 19 | Syed Saghir Syed | GHS Sarobi Ghari | 5/4/1968 | 16/11/2018 | BA/B.Ed | GMS Panzari |
| 4 | 20 | Syed Ashaq Hussain | GHS Kurez | 6/4/1973 | 16/11/2018 | BA/BE d. | GMS Cheeri |
| 5 | 21 | Alam Khan | GHS Gulstan | 10/6/1971 | 16/11/2018 | BA/BE d. | GHS Gulistan |
| 6 | 22 | Feroz Khan | GHS Mishti Bazar | 4/4/1967 | 16/11/2018 | BA/Bed | GMS Mirbak |
| 7 | 23 | Khitab Ali | GHS Kurez | 1/1/1974 | 16/11/2018 | BA/Bed | GHS Suliman Khel |
| 8 | 24 | Taj Wali Khan | GMS Goen | 2/1/1966 | 16/11/2018 | BA/Bed | GHS Mandati |
| 9 | 25 | Iftikhar Hussain | GMS Suleman Khel | 12/12/1975 | 16/11/2018 | BA/Bed | GHS Sullman Khel |
| 10 | 26 | Almas Khan | GHS Tooti Bagh | 11/3/1972 | 16/11/2018 | BA/Bed | GHS Anjani |
| 11 | 28 | M.Younas | GHS Gulistan | 5/4/1972 | 16/11/2018 | BA/Bed | GHS Manz Garhi |
| 12 | 30 | Fazal Kareem | GHS Saiful Darra | 16/4/1968 | 16/11/2018 | BA/Bed | GHS Saiful-Dara |

2 PSHT/SPST/PST TO SST (General) BPS-16:

| S. No | Sen No | Name of official & place of posting | School | DOB | D of App as Regular PST | Quali | Name of School where posted |
|-------|--------|-------------------------------------|---------------------|-----------|-------------------------|---------|-----------------------------|
| 1 | 70 | Syed Shoaib Hussain | GMPS Ghari Sra Mela | 13/2/1976 | 1/7/2012 | BA/B.Ed | GMS Mirazai |

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9/2/13

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| | | | | | | | |
|---|----|-------------------|----------------------|-----------|----------|---------|----------------|
| 2 | 72 | Syed Jalil Husain | GPS Kurez | 1/4/1972 | 1/7/2012 | BA/B.Ed | GMS Mahora |
| 3 | 81 | Muhamma Idress | GPS Biland Khel No.1 | 5/8/1970 | 1/7/2012 | BA/B.Ed | GHS Sawaro Kot |
| 4 | 82 | Kifayat Ullah | GPS Hanif Jan Killi | 11/2/1971 | 1/7/2012 | BA/B.Ed | GHS Daradar |
| 5 | 83 | Noor ul Ahad | GPS Koz Koruna | 1/6/1977 | 1/7/2012 | BA/B.Ed | GMS Injawar |
| 6 | 84 | Fazal Akbar | GPS Baza Khel | 1/12/1973 | 1/7/2012 | BA/B.Ed | GHS Ghiljo |

3 SDM/DM TO SST (General BPS-16.

| S. No | Serial No | Name of official & place of posting | School | DOB | D of App: as Regular DM | Quali | Name of School where posted |
|-------|-----------|-------------------------------------|-------------|----------|-------------------------|---------|-----------------------------|
| 1 | 04 | Ahmad Raza | GHS Paloosi | 4/2/1969 | 20/2/2013 | BA/B.Ed | GMS Khusra |

4 SIT/TT TO SST (General) BPS-16

| S. No | Serial No | Name of official & place of posting | School | DOB | D of App: as Regular SIT | Quali | Name of School where posted |
|-------|-----------|-------------------------------------|-----------|----------|--------------------------|---------|-----------------------------|
| 1 | 21 | Janib Ali | GMS Dippa | 1/3/1984 | 20/2/2013 | BA/B.Ed | GMS Saraga |

5 AT/SAT TO SST (General) BPS-16.

| S. No | Serial No | Name of official & place of posting | School | DOB | D of App: as Regular SAT | Quali | Name of School where posted |
|-------|-----------|-------------------------------------|------------|----------|--------------------------|---------|-----------------------------|
| 1 | 30 | Nizamuddin | GHS Spidar | 7/9/1970 | 4/12/2009 | BA/B.Ed | GHS Spidar |

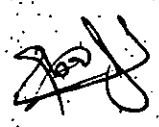
6. S Qari/Qari TO SST (General) BPS-16.

| S. No | Serial No | Name of official & place of posting | School | DOB | D of App: as Regular Qari | Quali | Name of School where posted |
|-------|-----------|-------------------------------------|-----------------|-----------|---------------------------|---------|-----------------------------|
| 1 | 5 | Khalilullah | GHS Inzer Patti | 10/4/1983 | 7/5/2018 | BA/B.Ed | GHS Daradar |

Terms and conditions: -

- 1 They teachers at S.No.1-3 above would be on probation for a period of one year extendable for a further period of one year.
- 2 They will be governed by such rules and regulations as and when issued from time to time by

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- 2 Their services can be terminated at any time; in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
- 4 Charge report should be submitted to all concerned.
- 5 No TA/DA is allowed for joining his duty.
- 6 They the teachers at S.No.1-3 above will give an under taking to be recorded in their service book to the effect that if any over payment is made to him in the light of this order will be recovered and if he is wrongly promoted, he will be reverted.
- 7 Before handing over charge once again their document may be checked if they have not the prescribed qualifications as per rules, they may not be handed over charge of the post.
- 8 The prescribed qualifications/ documents may be verified from the concerned Universities/ Institutions by the DEO concerned.

(Hafiz Dr. Muhammad Ibrahim)
 Director Elementary & Secondary Education
 Khyber Pakhtunkhwa

Dated Peshawar the 7/12/2020.

Endst: No. 6588-97

Copy forwarded for information and necessary action to the: -

- 1. Accountant General Khyber Pakhtunkhwa Peshawar.
- 2. District Education Officer Orakzai.
- 3. District Accounts Officer Orakzai.
- 4. PS to Secretary Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- 5. PS to Secretary Finance Khyber Pakhtunkhwa Peshawar.
- 6. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- 7. Principal/Head Mistress concerned.
- 8. Promotees Concerned.
- 9. M/File.

Deputy Director (Estab)
 Merged District

[Handwritten Signature]
 07/12/2020

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(9)

مختصر، حنا - DEO صاحب

عنوان درخواست لہراد SST تعیناتی

حنا - عالی

گزارش ہے کہ مذکورہ بحیثیت PHST سرکاری ملازم کے طور پر یہاں ایسا
ڈیوٹی انجام دے رہا ہے۔ اس کے ساتھ ساتھ اس میں ایک دیگر ملازم بھی ہے
حنا والا میں سے ہے۔ سٹیٹس اور انھوں نے دل کی لگنے سے اس کے
علاقہ GHS سلیمان کی مالک مکان کے ساتھ ساتھ یہاں ہے یہ سکول
میں سے گاؤں کے سرکاری ملازم ہیں۔

لہذا آپ صاحب کی خدمت میں عرض ہے کہ یہاں سے GHS
سلیمان میں لے کر گزارنے کے لئے اس کا موقع

الغالب

9/10/20

PS - PHST

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Handwritten signature/initials

Abamin Bilal

M.B.B.S., F.R.C.S.(Ed)
Overseas Fellow Cardio-Thoracic Surgery (London)

Professor of Cardio-Thoracic Surgery,
Post Graduate Medical Institute,
Lady Reading Hospital, Peshawar.

ڈاکٹر عامر بلال

ایم بی بی ایس، ایف آر سی ایس (ای ڈی)
ماہر امراض دل و سینہ (لندن)
پروفیسر آف کارڈیو تھوریک سرجری،
پی جی ایم آئی، ایل آر ایچ ہسپتال

پیشہ روزہ ہفت روزہ اتوار

Jalil, 49 yrs, Kohat.

Tab MORIK
ایک گولی سناؤ
Sup VENTOLINE
2+2+2

Tab SUSTAR ✓
ایک گولی سناؤ

Tab SURVIVE Plus ✓
ایک گولی سناؤ

Tab ESOL
1+

Tab OPERAMU
ایک گولی سناؤ

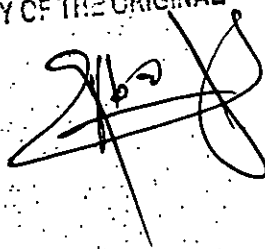
FIBROCM
2 صبر ایک گلاس سناؤ
سین ڈی ال گلاس سناؤ
لیس

8819126 4150

Clinic: 34-C, Khyber Medical Centre, Dabgari Garden Peshawar.
Tel: 2211241-9, Ext: 3178. For Appt: 2219907 / 0334-9075586

34-C خیبر میڈیکل سنٹر، ڈبگری گارڈن پشاور

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IN QUALITY, WE BELIEVE

Fahad Medical Lab

فہد میڈیکل لیبارٹری

Consultant Biochemist

HRA Registered

Clinical Pathologist

M. Khalid Khan
M.S.C. (Biochemistry)

Dr. Kashif Ali Samin
M.B.B.S, D.C.P (CA)

Name: Jalil
Ref. by: Prof Dr. Aamir Bilal
Test Req: Lipid Profile, RBS, Urea.

Sex: Male
Date: 27-03-2018

TEST RESULT

| <u>TEST</u> | <u>NORMAL</u> | <u>UNITS</u> | <u>RESULT</u> |
|-------------------|--------------------|--------------|---------------|
| Total Cholesterol | 120-220 | mg/dl | 178 |
| Triglycerides | 36-150 | mg/dl | 199 |
| HDL | M 35-55 F 45-65 | mg/dl | 45 |
| LDL | less than 150 | mg/dl | 93 |
| RBS | 70-150 | mg/dl | 102 |
| Urea | 10-50 | mg/dl | 37 |

Incharge Laboratory

All Queries / Discrepancies if any may be referred to our lab with in 24 hours of reporting for re-evaluation / re-confirmation.

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12

Fahad Medical Lab

IN QUALITY, WE BELIEVE

فہد میڈیکل لیبارٹری

Consultant Biochemist

HRA Registered

Clinical Pathologist

Akhtar Jamil
DMLT (Pathology)
Khyber Teaching Hospital

Dr. Kashif Ali Samin
M.B.B.S, D.C.P (CA)

Name: Jalil
Ref. by: Self
Test Req: Lipid Profile, H. Pylori

Sex: Male
Date: 04-01-2014

TEST RESULT

| TEST | NORMAL | UNITS | RESULT |
|-------------------|--------------------|-------|--------|
| Total Cholesterol | 120-220 | mg/dl | 176 |
| Triglycerides | 36-150 | mg/dl | 166 |
| HDL | M 35-55 F 45-65 | mg/dl | 45 |
| LDL | less than 150 | mg/dl | 105 |
| H. Pylori | Reactive (+ve) | | |
| Method Used ICT | | | |

[Signature]
Incharge Laboratory

All Queries / Discrepancies if any may be referred to our lab with in 24 hours of reporting for re-evaluation / re-confirmation.

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13

Doctor

Muhammad Saeed

M.B.B.S, D.CARD

EX-HEART SPECIALIST

DIVISIONAL HEADQUARTER HOSPITAL
K.D.A KOHAT



PMDC Reg No.771N

ڈاکٹر محمد سعید

ایم بی بی ایس، ڈی کارڈ

ایکس ہارٹ سپیشلسٹ

ڈویژنل ہیڈ کوارٹر ہسپتال کے ڈی اے کوہاٹ

Pt's Name جلیل حسن Age _____ Sex _____ Date 05 AUG 2020

Clinical Record

B.P. 100/80

HEART DROUGES

154 mg

811

0.6 W.P.T

200 mg

Rx

100

100

200

100

100

100

100

100

100

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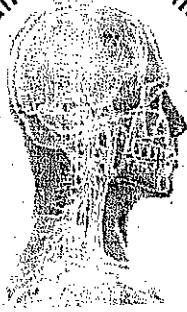
NOT VALID FOR COURT

Clinic: Near Sufaid Masjid Outside Tehsil Gate Kohat

14

Neuro Surgeon
Dr. Muhammad Nasir
M.B.B.S
M.C.P.S (General Surgery)
F.C.P.S (NeuroSurgery)

Brain & Spine Clinic



نیوروسرجن
ڈاکٹر محمد ناصر
ایم بی بی ایس، ایم سی پی ایس (جنرل سرجری)
ایف سی پی ایس (نیوروسرجری)
ماہر امراض: سر درد، فالج، مہرگی، ریڑھ ہڈی
17 مہتر، جوڑو پٹھہ، مہرچوٹ، مگردرد

Pt's Name Falib Hussain Age 48 Sex M Date 28/4/11 Area

Clinical Record

Rx

8-8-160/100
Depressed
Headache
important into
muscle

Ⓟ

Tab. Co. Valtre 80mg

Ⓟ

Tab. Arrox 67

Ⓟ

Tab. Zargel 100mg

Ⓟ

Tab. Infexin 500mg

Ⓟ

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موبائل نمبر
0346-5576877
0317-9717157

Not Valid For Court of Law

دوبارہ معائنہ کیلئے۔۔۔۔۔ تشریف لائیں

پتہ: کلینک پاک میڈیکل سنٹر بالمقابل گرنڈ گری کالج نزد پشاور چوک کوہاٹ

بخدمت جناب ڈسٹرک ایجوکیشن آفیسر ضلع اورکزئی

عنوان ضلع اورکزئی کے اساتذہ آپگریڈیشن کے ٹرانسفر، پوسٹنگ میں بڑے پیمانے پر کرپشن کا نوٹس لیا جائے مسائل کے ساتھ ٹرانسفر پوسٹنگ میں زیادتی کر کے دور دراز علاقے میں ٹرانسفر پر نظر ثانی کر کے غیر قانونی ٹرانسفر کو کینسل کیا جائے نہایت اداب سے گزارش کی جاتی ہے کہ میں سیدی جلیل حسین عرصہ دراز سے دور افتادہ علاقے میں اپنی خدمات سرانجام دے چکا ہوں ابھی گزشتہ دو سال سے گورنمنٹ پرائمری سکول کریم میں پی ایس ٹی پوسٹ پر اپنے ڈیوٹی سرانجام دے رہا ہوں اب چونکہ اساتذہ کی آپگریڈیشن میں ایس ایس ٹی میرٹ لسٹ کے پورے ضلع میں دوسرے پوزیشن پر تھا مسائل نے دو ماہ پہلے ایجوکیشن آفیسر کو باقاعدہ درخواست دیکر مسائل دل کا مریض اور سخت بیمار ہے اس لیے مسائل کو نزدیک سکول میں ایڈجسٹ کیا جائے پہلے تو مجھ سے کوثر علی ڈگری کی ریفلکشن کاراز فاش کرنے کے بعد میں دور دراز علاقے میں سکول ماہورہ میں پھینکا گیا جو کہ ظلم اور زیادتی ہے ضلع اورکزئی کے آپگریڈیشن کے میرٹ لسٹ اورکزئی کے ایجوکیشن آفسران اور کمیٹی کے ممبران کی ملی جھگڑ سے فائنل ایجوکیشن ڈائریکٹریٹ لاکرفون پر ایک ایک بندے سے پچاس ہزار سے لیکر ایک لاکھ تک باقاعدہ رشوت وصول کی ہیں اور ہر روز الگ الگ ٹرانسفر آرڈرز اور مختلف تاریخ میں فروخت ہو رہے ہیں جو ریکارڈ پر موجود ہے آفسران بالا کو چیلنج کرتے ہیں کہ وہ ایجوکیشن کے ریکارڈ لا کر ہمیں بتائے کہ کتنے آرڈرز سابقہ تاریخ میں الیشو کیے گئے ہیں جو آفسران بالا کے لیے لکھ کر یہ ہے جسکی وجہ سے ہمارے حقوق چھین کر میری حق تلفی کی گئی ہے

لہذا آپ صاحبان سے پرزور اپیل کی جاتی ہے کہ مسائل کے ٹرانسفر ایڈجسٹ پر نظر ثانی کر کے گورنمنٹ ہڈل سکول سترسم یا گورنمنٹ ہائی سکول سیڈنا تخیل میں ایڈجسٹ کیا جائے

عین نوازش ہوگی

12/12/2020 بمورخہ

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العارض

آپکا تابعدار سیدی جلیل حسین ایس ایس ٹی گورنمنٹ ہڈل سکول ماہورہ لوئیر اورکزئی

کابی انفارمیشن

1 سیکرٹری ایجوکیشن خیبر پختونخوا پشاور

ڈائریکٹر ایجوکیشن ایمنٹری اینڈ سیکنڈری ایجوکیشن پشاور

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO. 4823/2021

Syed Jaail HussainAppellant

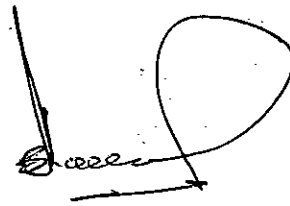
Versus

Director KP E&SE and others Respondents

SCANNED
PESHAWAR

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| 2 | Affidavit | ---- | 4 |
| 3 | Authority letter | ---- | 5 |
| 4 | Civil servant Act | A | 6-7 |
| 5 | Promotion order / CNiC photo copy | B | 8-11 |



15-02-24
Peshawar

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

Service Appeal No. 4823/2021

Diary No. 11153

Dated 15-02-2024

Syed Jalil Hussain VS Director E&SE and others

COMMENTS ON BEHALF OF RESPONDENT NO. 1& 2.

RESPECTFULLY SHEWETH:

Preliminary Objections.

1. That the appellant has got no cause of action/locus standi to file the instant service appeal.
2. That the present appeal is bad for non-joinder and mis-joinder of necessary parties.
3. That the appellant is estopped by his own conduct, by deed and by law to file the instant appeal.
4. That the instant appeal is not maintainable in its present form.
5. That present appeal is badly time barred.
6. That under Section 10 of the Civil Servant Act, the appellant is liable to serve anywhere in the province.
7. That the seniority of the appellant is maintained at Directorate of E&SE KP, being provincial cadre post the appellant has been adjusted at his own village Tehsil and District so, the appellant is misleading this Honourable Service Tribunal.

ON FACTS:

1. That Para-1 Pertains to record of the appellant.
2. That Para No. 2 is correct. Hence need no comments.
3. That no record of the appeal of the appellant has been found in the office of Respondent No. 2, however, the seniority of the appellant is maintained at Directorate of E&SE KP, being provincial cadre post the appellant has been adjusted at his own village Tehsil and District so, the appellant is misleading this Honourable Service Tribunal.
4. That as per rule upon promotion to the post of SST, incumbent/promotee shall be adjusted at Middle level or high level schools as post of SST as existing at middle/ high level school.
5. That detail reply has already been submitted under Para 3 above, hence need no further comments. However, there is no such application on respondents record.
6. That Para 6 is legal, however the Respondent also submit under following grounds inter alia.

ON GROUNDS

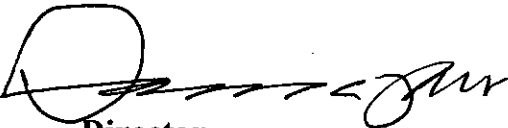
- A. That the respondent department has acted according to the rules/ policy. Under Section 10 of the Civil Servant Act, the appellant is liable to serve anywhere in the province attached as **(Annexure-A)**, the seniority of the appellant is maintained at Directorate of E&SE KP, being provincial cadre post the

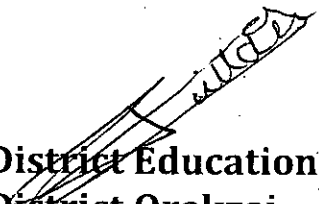
appellant has been adjusted at his own village Tehsil and District so, the appellant is misleading this Honourable Service Tribunal.

- B. Incorrect and denied. The Respondent Department has acted as per rules and policy and as per rule upon promotion to the post of SST, incumbent/promotee shall be adjusted at Middle level or high level schools as post of SST is existing at middle/ high level school.
- C. That the appellant has been adjusted at his own village Tehsil and District so, the appellant is misleading this Honourable Service Tribunal.
- D. Incorrect and denied. the appellant has been adjusted at his own village Tehsil and District so, the appellant is misleading this Honourable Service Tribunal.
- E. That the Respondent Department seek permission of this Honourable Service Tribunal to provide additional grounds at the time of arguments.

PRAYER

In view of the above facts and legal position of the instant case, It is, therefore, most humbly prayed that the instant appeal being merit list may kindly be dismissed.


Director
E&SE Khyber Pakhtunkhwa
(Respondent No.1)
ABDUL SAMAD


District Education Officer
District Orakzai
(Respondent No. 002)
FARED ULLAH

4



OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)ORAKZAI
Main Hangu Kohat Road Opposite Distt: Headquarter Orakzai at Hangu
Phone # 0925-690017 Fax # 0925-690017

Email: deorakzai2020@gmail.com



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 4823/2021

Syed Jalil Hussain.....APPELLANT

VERSUS

Director KP E&SE and Others.....RESPONDENTS

AFFIDAVIT

I, Mr. Hayat Khan District Education Officer (Male) Orakzai do hereby affirm and declare that the content of the accompanying compliance report submitted by the respondents are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court. *It is further stated on oath that answering*

*Respondent have neither place nor any other
Defense struck off/cab.*

~~DEPONENT~~

CNIC#17101-0391858-9

Cell No.0333-9306306

NOOR KARIM ADVOCATE
M.A, LL.M (U.O.P)
14 FEB 2021
OATH COMMISSIONER/
NOTARY PUBLIC HANGU

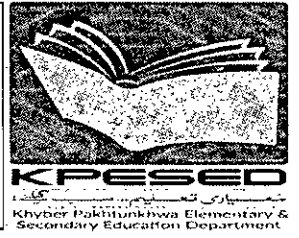


OFFICE OF THE DISTRICT EDUCATION OFFICER-ORAKZAI

Umar Plaza, Main Kohat Road, Muslimabad-Hangu.

Phone # 0925-690017 Fax # 0925-690017

Email: deorakzai2020@gmail.com



5

BEFORE THE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _4823/2021_

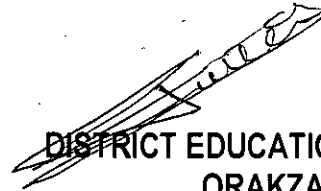
Syed Jalil Hussain.....APPELLANT

VERSUS

Director KP E&SE and Others.....RESPONDENTS

AUTHORITY LETTER

It is certified that the comments have been prepared/verified by the undersigned and submitted herewith to the honorable court. Moreover, Mr. Asad Ullah SS (BPS: 17) Focal Person Litigation of this office is hereby authorized to appear & submit the comments before the honorable Khyber Pakhtunkhawa Service Tribunal, Peshawar.


DISTRICT EDUCATION OFFICER,
ORAKZAI

Hayat Khan

Posting and Transfer

Statutory Provision.

Section 10 of the NWFP Civil Servants Act, 1973.

Posting and Transfer. Every civil servant shall be liable to serve anywhere within or outside the Province, in any post under the Federal Government, or any Provincial Government or Local authority, or a Corporation or body set up or established by any such Government:-

Provided that nothing contained in this section shall apply to a civil servant recruited specifically to serve in a particular area or region;

Provided further that, where a civil servant is required to serve in a post outside a service or cadre, his terms and conditions of service as to his pay shall not be less favourable than those to which he would have been entitled if he had not been so required to serve.

Posting/transfer policy of the Provincial Government.

- i) All the posting/transfers shall be strictly in public interest and shall not be abused/misused to victimize the Government servants
- ii) All Government servants are prohibited to exert political, Administrative or any other pressures upon the posting/transfer authorities for seeking posing/transfers of their choice and against the public interest.
- iii) All contract Government employees appointed against specific posts, can not be posted against any other post.
- iv) Existing tenure of posting/transfer of three (03) years for settled areas and two (02) years for unattractive/hard areas shall be reduced to two (02) years for settled areas, 01½ years for unattractive areas and one year for hard areas.
- v) ⁷⁹[]

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Para-I(v) regarding months of March and July for posting/transfer and authorities for relaxation of ban deleted vide letter No. SOR-VI (E&AD) I-4/2008/Vol-VI, dated 3-6-2008. Consequently authorities competent under the NWFP Government Rules of Business, 1985, District Government Rules of Business 2001, Posting/Transfer Policy and other rules for the time being in force, allowed to make Posting/Transfer subject to observance of the policy and rules.

Attested


- vi) ⁸⁰While making posting/transfers of officers/officials up to BS-17 from settled areas to FATA and vice versa approval of the Chief Secretary, NWFP needs to be obtained. Save Tehsildars/Naib Tehsildars within a division in respect of whom the concerned Commissioner will exercise the same power. Whereas, in case of posting/transfer of officers in BS-18 and above, from settled areas to FATA and vice versa, specific approval of the Governor, NWFP shall be obtained.

Provided that the power to transfer Political Tehsildars and Political Naib Tehsildars within FATA between different divisions shall rest in Additional Chief Secretary FATA.

- vi (a) All Officers/officials selected against Zone-I/FATA quota in the Provincial Services should compulsorily serve in FATA for at least eighteen months in each grade. This should start from senior most scales/grades downwards in each scale/grade of each cadre.
- vii) Officers may be posted on executive/administrative posts in the Districts of their domicile except District Coordination Officers (D.C.Os) and DPOs/Superintendent of Police (SP). Similarly Deputy Superintendent of Police (DSP) shall not be posted at a place where the Police Station (Thaana) of his area/residence is situated.
- viii) No posting/transfers of the officers/officials on detailment basis shall be made.
- ix) Regarding the posting of husband/wife, both in Provincial services, efforts where possible would be made to post such persons at one station subject to the public interest.
- x) All the posting/transferring authorities may facilitate the posting/ transfer of the unmarried female government Servants at the station of the residence of their parents.
- xi) Officers/officials except DCOs and DPOs/SPs who are due to retire within one year may be posted on their option on posts in the Districts of their domicile and be allowed to serve there till the retirement

⁸⁰

Para-VI added vide circular letter No. SOR-VI/E&AD/1-4/2010/Vol-VIII dated 20th March, 2010.

Abstract
[Signature]



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

PHONE: 091-3232222
FAX: 091-3232222

Notification

In pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.SO(PE)/4-5/SSRC/Meeting/2013/Teaching Cadre dated 24th July, 2014 and recommendations of the Departmental Promotion Committee, the following SCTs/CTs, SDMs/DMs, SATs/ATs, STTs/TTs, Senior Qaris/Qaris, PSHTs/SPSTs/PSTs of District Orakzai, are hereby promoted to the post of SST (Bio-Chem), SST (Phy-Maths), SST (General) and posted in the schools noted against each in BPS-16 (Rs. 18910-1520-64510) plus usual allowances as admissible under the rules on regular basis under the existing policy, on the terms and conditions given below, with immediate effect in the interest of public service.

1 SCT/CT TO SST (General) BPS-16.

| S.N | Sen No | Name | School | DOB | D of App as Regular | Quali | Name of School where posted |
|-----|--------|--------------------|------------------|------------|---------------------|---------|-----------------------------|
| 1 | 16 | Muhammad Sadiq | GHS Mishti Bazar | 3/4/1971 | 20/2/2013 | BA/B.Ed | GMS Qasim Khel |
| 2 | 17 | Kumail Shah | GHS Sra Mela | 7/11/1965 | 20/2/2013 | BA/B.Ed | GMS Parh Tangi |
| 3 | 19 | Syed Saghir Syed | GHS Sarobi Ghari | 5/4/1968 | 16/11/2018 | BA/B.Ed | GMS Panzari |
| 4 | 20 | Syed Ashaq Hussain | GHS Kurez | 6/4/1973 | 16/11/2018 | BA/B.Ed | GMS Cheeri |
| 5 | 21 | Alam Khan | GHS Gulstan | 10/6/1971 | 16/11/2018 | BA/B.Ed | GHS Gulistan |
| 6 | 22 | Feroz Khan | GHS Mishti Bazar | 4/4/1967 | 16/11/2018 | BA/Bed | GMS Mirbak |
| 7 | 23 | Khitab Ali | GHS Kurez | 1/1/1974 | 16/11/2018 | BA/Bed | GHS Suliman Khel |
| 8 | 24 | Taj Wali Khan | GMS Goen | 2/1/1966 | 16/11/2018 | BA/Bed | GHS Mandati |
| 9 | 25 | Iftikhar Hussain | GMS Suleman Khel | 12/12/1975 | 16/11/2018 | BA/Bed | GHS Suliman Khel |
| 10 | 26 | Almas Khan | GHS Tooli Bagh | 11/3/1972 | 16/11/2018 | BA/Bed | GHS Arjani |
| 11 | 28 | M. Younas | GHS Gulistan | 5/4/1972 | 16/11/2018 | BA/Bed | GHS Manz Garhi |
| 12 | 30 | Fazal Kareem | GHS Saiful Darra | 16/4/1968 | 16/11/2018 | BA/Bed | GHS Saiful Dara |

2 PSHT/SPST/PST TO SST (General) BPS-16.

| S.No | Sen No | Name of official & place of posting | School | DOB | D of App as Regular PST | Quali | Name of School where posted |
|------|--------|-------------------------------------|---------------------|-----------|-------------------------|---------|-----------------------------|
| 1 | 70 | Syed Shoaib Hussain | GMPS Ghari Sra Mela | 13/2/1976 | 1/7/2012 | BA/B.Ed | GMS Mirazai |

(9)

| | | | | | | | |
|----|----|-------------------|----------------------|-----------|----------|---------|----------------|
| 2. | 72 | Syed Jalil Husain | GPS Kurez | 1/4/1972 | 1/7/2012 | BA/B.Ed | GMS Mahora |
| 3 | 81 | Muhamma Idress | GPS Biland Khel No.1 | 5/8/1970 | 1/7/2012 | BA/B.Ed | GHS Sawaro Kot |
| 4 | 82 | Kifayat Ullah | GPS Hanif Jan Killi | 11/2/1971 | 1/7/2012 | BA/B.Ed | GHS Daradar |
| 5 | 83 | Noor ul Ahad | GPS Koz Koruna | 1/6/1977 | 1/7/2012 | BA/B.Ed | GMS Injavar |
| 6 | 84 | Fazal Akbar | GPS Baza Khel | 1/12/1973 | 1/7/2012 | BA/B.Ed | GHS Ghiljo |

2020.

3. SDM/DM TO SST (General) BPS-16.

| S. No | Se n No | Name of official & place of posting | School | DOB | D of App: as Regular DM | Quali | Name of School where posted |
|-------|---------|-------------------------------------|-------------|----------|-------------------------|---------|-----------------------------|
| 1 | 04 | Ahmad Raza | GHS Paloosi | 4/2/1969 | 20/2/2013 | BA/B.Ed | GMS Khusra |

Peshawar
a Peshawar.

4. STT/TT TO SST (General) BPS-16

| S. No | Se n No | Name of official & place of posting | School | DOB | D of App: as Regular STT | Quali | Name of School where posted |
|-------|---------|-------------------------------------|-----------|----------|--------------------------|---------|-----------------------------|
| 1 | 21 | Janib Ali | GMS Dipna | 1/3/1984 | 20/2/2013 | BA/B.Ed | GMS Saraga |

07/12/1

5. AT/SAT TO SST (General) BPS-16.

| S. No | Se n No | Name of official & place of posting | School | DOB | D of App: as Regular SAT | Quali | Name of School where posted |
|-------|---------|-------------------------------------|------------|----------|--------------------------|---------|-----------------------------|
| 1 | 30 | Nizamuddin | GHS Spidar | 7/9/1970 | 4/12/2009 | BA/B.Ed | GHS Spidar |

Attst

6. S Qari/Qari TO SST (General) BPS-16.

| S. No | Se n No | Name of official & place of posting | School | DOB | D of App: as Regular Qari | Quali | Name of School where posted |
|-------|---------|-------------------------------------|-----------------|-----------|---------------------------|---------|-----------------------------|
| 1 | 5 | Khalilullah | GHS Inzer Patti | 10/4/1983 | 7/5/2018 | BA/B.Ed | GHS Daradar |

Terms and conditions: -

- 1 They teachers at S.No.1-3 above would be on probation for a period of one year extendable for a further period of one year.
- 2 They will be governed by such rules and regulations as and when issued from time to time by

10

Their services can be terminated at any time; in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.

- 4 Charge report should be submitted to all concerned.
- 5 No TA/DA is allowed for joining his duty.
- 6 They the teachers at S.No.1-3 above will give an under taking to be recorded in their service book to the effect that if any over payment is made to him in the light of this order will be recovered and if he is wrongly promoted, he will be reverted.
- 7 Before handing over charge once again their document may be checked if they have not the prescribed qualifications as per rules, they may not be handed over charge of the post.
- 8 The prescribed qualifications/ documents may be verified from the concerned Universities/ Institutions by the DEO concerned.

(Hafiz Dr. Muhammad Ibrahim)
 Director Elementary & Secondary Education
 Khyber Pakhtunkhwa
 Dated Peshawar the 7/12/2020.

Endst: No. 6588-97

Copy forwarded for information and necessary action to the:-

- 1. Accountant General Khyber Pakhtunkhwa Peshawar.
- 2. District Education Officer Orakzai.
- 3. District Accounts Officer Orakzai.
- 4. PS to Secretary Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- 5. PS to Secretary Finance Khyber Pakhtunkhwa Peshawar.
- 6. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.

District
 07/12/20

Attest




(11)

حکومت پاکستان

قومی شناختی کارڈ

21603-4893202-9

نام: سید خلیل حسین

جنس: مرد

والد کا نام: سید زین حسین

شناختی علاقہ: دائیں اٹلی پر زخم

تاریخ پیدائش: 01/04/1972

عثمان یوسف

دستور جسن



دستخط مائل کارڈ

Altair

شناختی نمبر: 21603-4893202-9 فائدان نمبر: X5045K

موجودہ پتہ: قوم پر محمد خلیل تپہ بابا الہاسی، چانودگ، ڈھانڈا کرین، تحصیل لوز
بئلاج اور آئی ایچ سی

مستقل پتہ: ایضاً

تاریخ اجراء: 20/08/2015 تاریخ تسخیر: 20/08/2025

گمشدہ کارڈ ملنے پر قریبی لیٹر بکس میں ڈال دیں



18/3

~~06/01/2021~~~~24/04/2021~~**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

S.A No4823/2021

Syed Jalil Hussain(appellant)

Versus

Director E&SE KPK and Others.....(Responden)

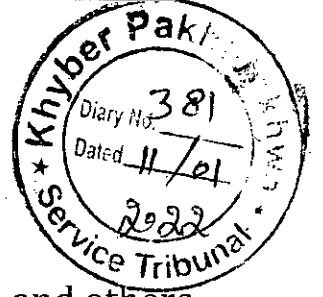
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| 3 | Authority letter | ----- | 5 |
| 3 | Civil servant Act 1973 and Adjustment order | A | 6-10 |

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. 4823/2021



Syed Jalil Hussain VS Director E&SE and others

COMMENTS ON BEHALF OF RESPONDENT NO. 1 & 2.

RESPECTFULLY SHEWETH:

Preliminary Objections.

1. That the appellant has got no cause of action/locus standi to file the instant service appeal.
2. That the present appeal is bad for non-joinder and mis-joinder of necessary parties.
3. That the appellant is estopped by his own conduct, by deed and by law to file the instant appeal.
4. That the instant appeal is not maintainable in its present form.
5. That present appeal is badly time barred.
6. That under Section 10 of the Civil Servant Act, the appellant is liable to serve anywhere in the province.
7. That the seniority of the appellant is maintained at Directorate of E&SE KP, being provincial cadre post the appellant has been adjusted at his own village Tehsil and District so, the appellant is misleading this Honourable Service Tribunal.

ON FACTS:

1. That Para-1 Pertains to record of the appellant.
2. That Para No. 2 is correct. Hence need no comments.
3. That no record of the appeal of the appellant has been found in the office of Respondent No. 2, however, the seniority of the appellant is maintained at Directorate of E&SE KP, being provincial cadre post the appellant has been adjusted at his own village Tehsil and District so, the appellant is misleading this Honourable Service Tribunal.
4. That as per rule upon promotion to the post of SST, incumbent/promotee shall be adjusted at Middle level or high level schools as post of SST as existing at middle/ high level school.
5. That detail reply has already been submitted under Para 3 above, hence need no further comments. However, there is no such application on respondents record.
6. That Para 6 is legal, however the Respondent also submit under following grounds inter alia.

ON GROUNDS

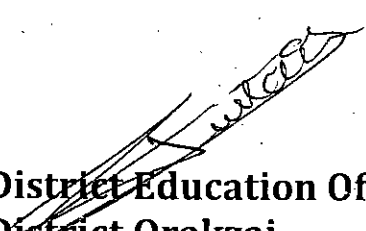
- A. That the respondent department has acted according to the rules/ policy. Under Section 10 of the Civil Servant Act, the appellant is liable to serve anywhere in the province attached as **(Annexure-A)**, the seniority of the appellant is maintained at Directorate of E&SE KP, being provincial cadre post the

appellant has been adjusted at his own village Tehsil and District so, the appellant is misleading this Honourable Service Tribunal.

- B. Incorrect and denied. The Respondent Department has acted as per rules and policy and as per rule upon promotion to the post of SST, incumbent/promotee shall be adjusted at Middle level or high level schools as post of SST is existing at middle/ high level school.
- C. That the appellant has been adjusted at his own village Tehsil and District so, the appellant is misleading this Honourable Service Tribunal.
- D. Incorrect and denied. the appellant has been adjusted at his own village Tehsil and District so, the appellant is misleading this Honourable Service Tribunal.
- E. That the Respondent Department seek permission of this Honourable Service Tribunal to provide additional grounds at the time of arguments.

PRAYER

In view of the above facts and legal position of the instant case, It is, therefore, most humbly prayed that the instant appeal being merit list may kindly be dismissed.


District Education Officer
District Orakzai
(Respondent No. 1 & 2)

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

S.A No4823/2021

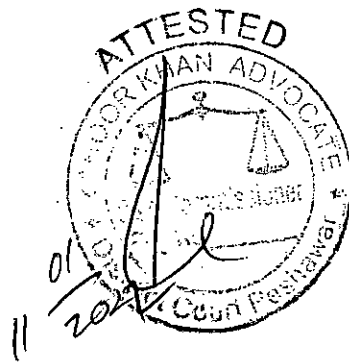
Syed Jalil Hussain(appellant)

Versus

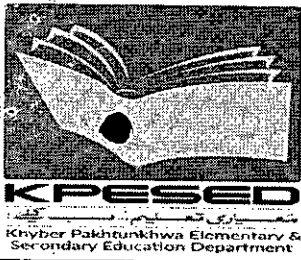
Director E&SE KPK and Others.....(Respondents)

AFFIDAVIT

I Mr. Asad Ullah-Litigation Officer (BS-17) District Education Office Orakzai do hereby declare and affirm that the above comments are true and correct to the best of our Knowledge and belief that nothing has been concealed from this Honorable Tribunal.



Deponent



OFFICE OF THE DISTRICT EDUCATION OFFICER-ORAKZAI

Umar Plaza, Main Kohat Road, Muslimabad-Hangu.
Phone # 0925-690017 Fax # 0925-690017

5

No. 9548 Dated: 22/12/2021

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Service Appeal No. 4823/2021

Syed Jalil Hussain **APPELLANT**

VERSUS

1-Director E&SE and others..... **RESPONDENTS**

AUTHORITY

Mr. Asad Ullah SS (BPS:17) Focal Person Litigation of this office is hereby authorized to appear before the honorable Khyber Pakhtunkhwa Service Tribunal Peshawar in service appeal No. 4823/2021 on the behalf of Respondents.


DISTRICT EDUCATION OFFICER,
ORAKZAI

(6)

(Annex - A)

Civil Servants Act, 1973 (Act No. LXXI of 1973)

An Act to regulate the appointment of persons to, and the terms and conditions of Service of persons in, the service of Pakistan.

WHEREAS it is expedient to regulate by law, the appointment of persons to, and the terms and conditions of service of persons, in the service of Pakistan, and to provide for matters connected therewith or ancillary thereto;

It is hereby enacted as follows:-

1. Short title, application and commencement.-(1) This Act may be called the Civil Servants Act, 1973.

(2) it applies to all civil servants wherever they may be.

(3) It shall come into force at once.

2. Definitions.-(1) In this act, unless there is anything repugnant in the subject or context,-

(a) "ad hoc appointment" means appointment of a duly qualified person made otherwise than in accordance with the prescribed method of recruitment, pending recruitment in accordance with such method;

(b) "civil servant" means a person who is a member of an All-Pakistan Service or of a civil service of the Federation, or who holds a civil post in connection with the affairs of the Federation, including any such post connected with defence, but does include-

(i) a person who is on deputation to the Federation from any Province or other authority;

(ii) a person who is employed on contract, or on work-charged basis or who is paid from contingencies; or

(iii) a person who is "worker" or "workman" as defined in the Factories Act, (XXV of 1934), or the Workman's Compensation Act, 1923 (VIII of 1923);

(c) "initial appointment" means appointment made otherwise than by promotion or transfer.

(d) "pay" means the amount drawn monthly by a civil servant as pay and includes technical pay, special pay, personal pay and any other emoluments declared by the prescribed authority to be pay;

(e) "permanent post" means a post sanctioned without limit of time;

(f) "prescribed" means prescribed by rules;

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9. Promotion - (1) A civil servant possessing such minimum qualifications as may be prescribed shall be eligible for promotion to a higher post for the time being reserved under the rules for departmental promotion in the service or cadre to which he belongs:

"Provided that the posts of -

(a) Additional Secretary and Senior Joint Secretary may, in the public interest, be filled by promotion from amongst officers of regularly constituted Occupational Groups and services holding, on regular basis, posts in Basic Pay Scale 20; and (b) Secretary may, in the public interest, be filled by promotion from amongst officers of regularly constituted Occupational Groups and services holding, on regular basis, posts in Basic Pay Scale 21, in such manner and subject to such conditions as may be prescribed."

(2) A post referred to in sub-section (1) may either be a selection post or a non-selection post to which promotions shall be made as may be prescribed-

(a) in the case of a selection post, on the basis of selection on merit; and (b) in the case of a non-selection post, on the basis of seniority-cum-fitness.

(3) Promotion to posts in basic pay scales 20 and 21 and equivalent shall be made on the recommendations of a Selection Board which shall be headed by the Chairman, Federal Public Service Commission.

10. Posting and transfer.- Every civil servant shall be liable to serve anywhere within or outside Pakistan, in any equivalent or higher post under the Federal Government, or any Provincial Government, or local authority, or a corporation or body set up or established by any such Government;

Provided that nothing contained in this section shall apply to a civil servant recruited specifically to serve in a particular area or region:

Provided further that, where a civil servant is required to serve in a post outside his service or cadre, his terms and conditions of service as to his pay shall not be less favorable than those to which he would have been entitled if he had not been so required to serve.

11. Termination of service.- (1) The service of a civil servant may be terminated without notice-

(i) during the initial or extended period of his probation:

Provided that, where such civil servant is appointed by promotion on probation or, as the case may be, is transferred from one grade, service, or post to another service, cadre or post, his service shall not be so terminated so long as he holds a lien against

8

Orakzai SST (M) Notification



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

Notification

In pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.SO(PE)/4-5/SSRC/Meeting/2013/Teaching Cadre dated 24th July, 2014 and recommendations of the Departmental Promotion Committee, the following SCTs/CTs, SDMs/DMs, SATs/ATs, STTs/TTs, Senior Qaris/Qaris, PSHTs/SPSTs/PSTs of District Orakzai, are hereby promoted to the post of SST (Bio-Chem), SST (Phy-Maths), SST (General) and posted in the schools noted against each in BPS-16 (Rs. 18910-1520-64510) plus usual allowances as admissible under the rules on regular basis under the existing policy, on the terms and conditions given below, with immediate effect in the interest of public service.

1. SCT/CT TO SST (General) BPS-16.

| S.No | Sen No | Name | School | DOB | D of App: as Regular CT | Quali | Name of School where posted |
|------|--------|--------------------|------------------|------------|-------------------------|---------|-----------------------------|
| 1 | 16 | Muhammad Sadiq | GHS Mishti Bazar | 3/4/1971 | 20/2/2013 | BA/B.Ed | GMS Qasim Khel |
| 2 | 17 | Kumail Shah | GHS Sra Mela | 7/11/1965 | 20/2/2013 | BA/B.Ed | GMS Parh Tangi |
| 3 | 19 | Syed Saghir Syed | GHS Sarobi Ghari | 5/4/1968 | 16/11/2018 | BA/B.Ed | GMS Panzari |
| 4 | 20 | Syed Ashaq Hussain | GHS Kurez | 6/4/1973 | 16/11/2018 | BA/BE d | GMS Cheeri |
| 5 | 21 | Alam Khan | GHS Gulistan | 10/6/1971 | 16/11/2018 | BA/BE d | GHS Gulistan |
| 6 | 22 | Feroz Khan | GHS Mishti Bazar | 4/4/1967 | 16/11/2018 | BA/Bed | GMS Mirbak |
| 7 | 23 | Khitab Ali | GHS Kurez | 1/1/1974 | 16/11/2018 | BA/Bed | GHS Suliman Khel |
| 8 | 24 | Taj Wali Khan | GMS Goen | 2/1/1966 | 16/11/2018 | BA/Bed | GHS Mandati |
| 9 | 25 | Iftikhar Hussain | GMS Suleman Khel | 12/12/1975 | 16/11/2018 | BA/Bed | GHS Suliman Khel |
| 10 | 26 | Almas Khan | GHS Tooti Bagh | 11/3/1972 | 16/11/2018 | BA/Bed | GHS Anjani |
| 11 | 28 | M.Younas | GHS Gulistan | 5/4/1972 | 16/11/2013 | BA/Bed | GHS Mianz Garhi |
| 12 | 30 | Fazal Kareem | GHS Saiful Darra | 16/4/1968 | 16/11/2018 | BA/Bed | GHS Saiful-Dara |

2. PSHT/SPST/PST TO SST (General) BPS-16.

| S.No | Sen No | Name of official & place of posting | School | DOB | D of App: as Regular PST | Quali | Name of School where posted |
|------|--------|-------------------------------------|---------------------|-----------|--------------------------|---------|-----------------------------|
| 1 | 70 | Syed Shoab Hussain | GMPS Ghari Sra Mela | 13/2/1976 | 1/7/2012 | BA/B.Ed | GMS Mirazai |

(9)

| | | | | | | | |
|---|----|-------------------|----------------------|-----------|----------|---------|----------------|
| 2 | 72 | Syed Jalil Husain | GPS Kurez | 1/4/1972 | 1/7/2012 | BA/B.Ed | GMS Mahora |
| 3 | 81 | Muhamma Idress | GPS Biland Khel No.1 | 5/8/1970 | 1/7/2012 | BA/B.Ed | GHS Sawaro Kot |
| 4 | 82 | Kitayat Ullah | GPS Hanif Jan Killi | 11/2/1971 | 1/7/2012 | BA/B.Ed | GHS Daradar |
| 5 | 83 | Noor ul Ahad | GPS Koz Koruna | 1/6/1977 | 1/7/2012 | BA/B.Ed | GMS Injavar |
| 6 | 84 | Fazal Akbar | GPS Baza Khel | 1/12/1973 | 1/7/2012 | BA/B.Ed | GHS Ghiljo |

3 SDM/DM TO SST (General BPS-16)

| S. No. | Se n No | Name of official & place of posting | School | DOB | D of App as Regular DM | Quali | Name of School where posted |
|--------|---------|-------------------------------------|-------------|----------|------------------------|---------|-----------------------------|
| 1 | 04 | Ahmad Raza | GHS Paloosi | 4/2/1969 | 20/2/2013 | BA/B.Ed | GMS Khusra |

4 STT/TT TO SST (General) BPS-16

| S. No. | Se n No | Name of official & place of posting | School | DOB | D of App as Regular STT | Quali | Name of School where posted |
|--------|---------|-------------------------------------|----------|----------|-------------------------|---------|-----------------------------|
| 1 | 21 | Janib Ali | GMS Dipa | 1/3/1984 | 20/2/2013 | BA/B.Ed | GMS Saraga |

5 AT/SAT TO SST (General) BPS-16

| S. No. | Se n No | Name of official & place of posting | School | DOB | D of App as Regular SAT | Quali | Name of School where posted |
|--------|---------|-------------------------------------|------------|----------|-------------------------|---------|-----------------------------|
| 1 | 30 | Nizamuddin | GHS Spidar | 7/9/1970 | 4/12/2009 | BA/B.Ed | GHS Spidar |

6. S Oari/Qari TO SST (General) BPS-16

| S. No. | Se n No | Name of official & place of posting | School | DOB | D of App as Regular Qari | Quali | Name of School where posted |
|--------|---------|-------------------------------------|-----------------|-----------|--------------------------|---------|-----------------------------|
| 1 | 5 | Khalilullah | GHS Inzer Patti | 10/4/1983 | 7/5/2018 | BA/B.Ed | GHS Daradar |

Terms and conditions: -

1. They teachers at S.No.1-3 above would be on probation for a period of one year extendable for a further period of one year.
2. They will be governed by such rules and regulations as and when issued from time to time by

10

Their services can be terminated at any time; in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.

Charge report should be submitted to all concerned.

No TA/DA is allowed for joining his duty.

They the teachers at S.No.1-3 above will give an under taking to be recorded in their service book to the effect that if any over payment is made to him in the light of this order will be recovered and if he is wrongly promoted, he will be reverted.

7 Before handing over charge once again their document may be checked if they have not the prescribed qualifications as per rules, they may not be handed over charge of the post.

8 The prescribed qualifications/ documents may be verified from the concerned Universities/ Institutions by the DEO concerned.

(Hafiz Dr. Muhammad Ibrahim)
Director Elementary & Secondary Education
Khyber Pakhtunkhwa
Dated Peshawar the 7/12/2020.

Endst: No. 6588-97

Copy forwarded for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar
2. District Education Officer Orakzai
3. District Accounts Officer Orakzai
4. PS to Secretary Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
5. PS to Secretary Finance Khyber Pakhtunkhwa Peshawar
6. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar

Merged Districts

07/12/20

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