

INDEX

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

EXECUTION NO _____

APPEAL NO	INSTITUTION	ORIGINAL INSTITUTION	DECISION	PAGES
907/2023	-	02-05-2023	04.06.24	82

Asif Ali vs *EDUCATION*

Sr.No.	No of Pages	Documents	Page No
Part-A			
1	01-05	Judgment	05
2	06-10	Order Sheets	05
3	11-47	Memo of Appeal	37
4	48-48	Wakalatnama	01
5	49-49	Challan	01
6	50-53	Notices	04
7	54-82	Reply	29
8	-		
9	-		
10	-		
11	-		
12	-		
Part-B			
1	-		
2	-		
3	-		
Total Pages in Part-A			0 82
Total Pages in Part-B			0

Muharir
Muharir Compilation

Incharge Judicial Branch
Incharge Judicial Branch

GOVERNMENT OF INDIA
MINISTRY OF CIVIL SUPPLY
(Regulation Wing)
Mr. SOULAINZAR/2000
Chief Postman, the S.M. Dept., 1100

To: All Administrative Secretaries to Government of W.P.P.

Subject: APPOINTMENT OF STAFF UNDER DEVELOPMENTAL SCHEMES

Sir,

I am directed to say that developmental schemes/projects are normally sanctioned for some specific period whereas usually appointments against the project posts are made irrespective of the period for which the project has been sanctioned. On the expiry of the developmental phase of the project, the staff so appointed stands terminated provided the project period is not extended or converted into normal budget.

2. It has been observed that on completion of the developmental phase of the project, pressure is exerted both from sponsors of the scheme(s) and political quarters either to extend the project life or convert the same into non-developmental budget and accordingly departments are confronted with an embarrassing situation.

3. In order to avoid such a situation it has been decided that in future appointments against the project(s) posts shall be made for a specific period on contract basis with clear cut provision that the services of the appointees would be liable to termination on the expiry of the contract or the project period whichever is earlier.

I am accordingly directed to say that in case of appointments on contract basis, it should be provided in the offer of appointment that on expiry/completion of the contract/project, services of the newly recruited employee in the project shall stand terminated and shall not confer on the individual any right of acceptance or continuation of their services.

The above instructions are hereby being issued to all Administrative Secretaries.

(Signature)
(Name)
(Designation)

Handwritten notes:
1. 10/11/11
2. 10/11/11
3. 10/11/11
4. 10/11/11
5. 10/11/11

Handwritten notes:
6. 10/11/11
7. 10/11/11
8. 10/11/11
9. 10/11/11
10. 10/11/11

1

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL
PESHAWAR
AT CAMP COURT SWAT

BEFORE: RASHIDA BANO ... MEMBER (J)
MUHAMMAD AKBAR KHAN ... MEMBER (E)

Service Appeal No. 907/2023

Date of presentation of Appeal.....02.05.2023
Date of Hearing.....04.06.2024
Date of Decision.....04.06.2024

Mr. Asif Ali, SST (Bio-Chem) (BPS-16), GHS Doag Payeen, Dir
Upper.....(Appellant)

VERSUS

1. The Secretary, E&SE Department Khyber Pakhtunkhwa, Peshawar.
2. The Director, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
3. The District Education Officer (M), District Dir Upper.
4. The District Account Officer, District Dir Upper.....(Respondents)

MIR ZAMAN,
Advocate

--- For appellant.

UMAIR AZAM,
Additional Advocate General

--- For respondents

JUDGMENT

MUHAMMAD AKBAR KHAN, MEMBER (E):-The instant service appeal has
been instituted under Section 4 of the Khyber Pakhtunkhwa Service Tribunal, Act
1974 with the prayer copied as under;

*"That on acceptance of this appeal this august Tribunal may
be pleased to:-*

- I. *Modified/rectified the impugned orders dated
29.10.2021 and 06.11.2021 to the extent that the appellant be
re-instated into service w.e.f. from 08.03.2019 with all back
and consequential benefits.*

SCANNED
KPST
Peshawar

II. Also modified/rectified the impugned regularization Notification dated 01.12.2022 to the extent that the appellant be regularized w.e.f. the date of 1st appointment i.e. 14.09.2018 in light of Rule-2.3 of the West Pakistan Pension Rules, 1963.

III. Any other relief which this august Tribunal deems appropriate may also be granted in favor of the appellant.”

02. Brief facts of the case are that the appellant was initially appointed to the post of SST (Bio-Chem) BPS-16 on adhoc/contract basis vide order dated 14.09.2018. The appellant is basically aggrieved from the regularization Notification dated 01.12.2022 whereby the services of the appellant were regularized w.e.f. 29.10.2021 instead of his initial appointed i.e. 14.09.2018. He preferred departmental appeal against the impugned Notification 01.12.2022 on 21.12.2022 which was not responded, hence preferred the instant service appeal on 02.05.2023

03. Notices were issued to the respondents, who submitted their comments, wherein they refuted the assertions raised by the appellant in his appeal. We have heard arguments of learned counsel for the appellant, learned Additional Advocate General for the respondents and have gone through the record with their valuable assistance.

04. The learned counsel for the appellant reiterated the facts and grounds detailed in the memo and grounds of the appeal while the learned District Attorney, controverted the same by supporting the impugned order(s).

05. It is evident from the scrutiny of record that the appellant was appointed as SST on adhoc/contract basis for a specified period of one year w.e.f 20

September, 2018 to 19th September-2019 vide order dated 14.09.2018. After joining his duty the appellant remained absent from duty and was called explanation to which he replied and submitted medical documents and requested for medical leave. Due to his continuous absence the competent authority (Director Elementary & Secondary Education) discontinued the contract of the appellant vide order dated 08.03.2019. The appellant submitted departmental appeal which was accepted by the appellate authority vide order dated 29.10.2021 in the following manner:-

In exercise of the powers conferred under the rule 17 (2)(b) of Efficiency & Discipline Rules, 2011, the appellate authority (Secretary E&SE) has been pleased to reserve the contractual appointment of Mr. Asif Ali as SST (Bio Chem) (BPS-16) in E&SE department District Dir Upper with immediate effect. The intervening period w.e.f. 08.03.2019 is hereby treated as leave without pay as provided under FR.54.


06. Subsequently in accordance with Khyber Pakhtunkhwa Teachers (Appointment and Regularization of Services) Act, 2022, the services of the appellant alongwith others were regularized vide order dated 01.12.2022 w.e.f the date of their initial appointment. However, in the regularization order dated 01.12.2022 the date of appointment of the appellant has been shown as 29.10.2021. We hold that the appellate authority had restored the contractual appointment of the appellant with immediate effect and regularized the intervening period w.e.f 08.03.2019 by treating the period as leave without pay. Since the contractual period of the appellant has been treated as leave without pay for which he cannot claim any monetary benefits but his date of first appointment remains the same i.e. 14.09.2018, therefore, the appeal is partially allowed and the respondents are directed to modify the regularization order

dated 01.12.2022 to the extent of initial appointment of the appellant accordingly. Costs shall follow the event. Consign.

07. *Pronounced in open court at camp court Swat and given under our hands and seal of the Tribunal on this 04th day of June, 2024.*



(RASHIDA BANO)
Member (E)
Camp Court Swat



(MUHAMMAD AKBAR KHAN)
Member (E)
Camp Court Swat

(5)

ORDER

04.06.2024

1. Learned counsel for the appellant present. Mr. Umair Azam, Additional Advocate General for the respondents present. Arguments heard and record perused.
2. Vide our detailed judgment of today, separately placed on file, the appeal is partially allowed and the respondents are directed to modify the regularization order dated 01.12.2022 to the extent of initial appointment of the appellant accordingly. Costs shall follow the event. Consign.
3. *Pronounced in open court at camp court Swat and given under our hands and seal of the Tribunal on this 04th day of June, 2024.*



(RASHIDA BANO)
Member (J)
Camp Court Swat



(MUHAMMAD AKBAR KHAN)
Member (E)
Camp Court Swat

06.02.2024

Tour to Camp Court Swat has been cancelled, therefore to come up for the same as before on 04.04.2024.


Reader


Due to cancellation of tour case is adjourned to 08-05-2024.




08.05.2024 01. Counsel for the appellant present. Mr. Muhamimad Jan, District Attorney alongwith Fauseef Ahmad, Litigation Officer for the respondents present.

02. Representative of the respondents is directed to produce on the next date Diary Register of Director E&SE in order to ascertain that departmental appeal submitted by the appellant was entered at S.No. 992 dated 16.09.2018 or something else. Representative of the respondents is further directed to produce extension order of all the employees who were appointed in the year 2018. To come up for record and arguments on 04.06.2024 before the D.B at camp court, Swat.

PP given to the parties.


(Fareeha Paul)
Member(E)
Camp Court, Swat.


(Rashida Bano)
Member(I)
Camp Court Swat


7

08.11.2023

Appellant in person present. Mr. Muhammad Irfan, Assistant alongwith Mr. Asad Ali Khan, Assistant Advocate General for the respondents present.

Para-wise comments on behalf of respondents No. 1 to 3 have already been submitted through office, which are available on file. Written reply on behalf of respondent No. 4 submitted today. Office is directed to scan the same. Adjourned. To come up for arguments on 01.01.2024 before the D.B at Camp Court Swat. Parcha Peshi given to the parties.

SCANNED
KPST
Peshawar


(Salah-Ud-Din)
Member (J)
Camp Court Swat


Naeem Amin

01.01.2024

Appellant alongwith his counsel present. Mr. Touseef, Litigation Officer alongwith Mr. Asad Ali Khan, Assistant Advocate General for the respondents present.

Learned counsel for the appellant seeks some time for preparation of arguments. Adjourned. To come up for arguments on 06.02.2024 before the D.B at Camp Court Swat. Parcha Peshi given to the parties.

SCANNED
KPST
Peshawar


(Rashida Bano)
Member (J)
Camp Court Swat


(Salah-ud-Din)
Member (J)
Camp Court Swat

Naeem Amin


8

05.10.2023

Appellant in person present. Mr. Touseef Ahmed, Assistant and Mr. Irfan, Assistant alongwith Mr. Inayatullah Khan, Assistant Advocate General for the respondents present.

Representatives of the respondents requested for further time for submission of reply/comments. Last opportunity given. In case the last opportunity as given is not availed, the next adjournment shall be subject to prior payment of cost of Rs. 10000/-. Adjourned. To come up for reply/comments on 08.11.2023 before the S.B at Camp Court Swat. Parcha Peshi given to the parties.

SCANNED
KPST
Peshawar


(Salah-Ud-Din)
Member (J)
Camp Court Swat

Naeem Amin

[A long, curved line drawn across the page]

[Faint, illegible text]

14th June, 2023

01. Counsel for the appellant present. Preliminary arguments heard and record perused.

02. Points raised need consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security within 10 days. Thereafter local respondents be served through ordinary mode while out-district respondents be served through TAC, the expenses of which shall be deposited by the appellant. To come up for written reply/comments on 27.07.2023 before the S.B. Parcha Peshi given to learned counsel for the appellant.



(Fareeha Paul)
Member(E)

SCANNED
Peshawar

27th July, 2023

1. *Fazle Subhan, P.S.*
Junior to counsel for the appellant present. Mr. Fazal Shah Mohmand, Additional Advocate General for respondents present.

2. Security fee as well as expenses of TCS have not been deposited by the appellant. Junior counsel for appellant is directed to deposit the same within 3 days, positively. Where-after, notices be issued to respondents for reply/comments. This case pertains to Camp Court, Swat, therefore, it be fixed for reply/comments on 05.10.2023 before S.B at Camp Court, Swat. P.P given to the parties.


(Kalim Arshad Khan)
Chairman

SCANNED
KE ST
Peshawar

FORM OF ORDER SHEET

10

Court of _____

Case No. -

907

/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1.	2.	3.
1-	02/05/2023	<p>The appeal of Mr. Asif Ali presented today by Mr. Mir Zaman Safi Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <u>05/05/23</u>.</p>
	05.05.2023	<p>Junior to counsel for the appellant present and requested for adjournment on the ground that learned counsel for the appellant is out of station. Adjourned. To come up for preliminary hearing on 14.06.2023 before S.B. Parcha Peshi given to junior to counsel for the appellant.</p>

SCANNED
KPST
Peshawar

By the order of Chairman


REGISTRAR

31
26

SCANNED
KPST
Peshawar

(Muhammad Akbar Khan)
Member (E)

(11)

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

CHECK LIST

Case Title: Asif Ali v/s Education Deptt.

S#	CONTENTS	YES	NO
1	This Appeal has been presented by: _____	✓	
2	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	✓	
3	Whether appeal is within time?	✓	
4	Whether the enactment under which the appeal is filed mentioned?	✓	
5	Whether the enactment under which the appeal is filed is correct?	✓	
6	Whether affidavit is appended?	✓	
7	Whether affidavit is duly attested by competent Oath Commissioner?	✓	
8	Whether appeal/annexures are properly paged?	✓	
9	Whether certificate regarding filing any earlier appeal on the subject, furnished?	x	✓
10	Whether annexures are legible?	✓	
11	Whether annexures are attested?	✓	
12	Whether copies of annexures are readable/clear?	✓	
13	Whether copy of appeal is delivered to AG/DAG?	✓	
14	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	✓	
15	Whether numbers of referred cases given are correct?	✓	
16	Whether appeal contains cutting/overwriting?	x	✓
17	Whether list of books has been provided at the end of the appeal?	✓	
18	Whether case relate to this court?	✓	
19	Whether requisite number of spare copies attached?	✓	
20	Whether complete spare copy is filed in separate file cover?	✓	
21	Whether addresses of parties given are complete?	✓	
22	Whether index filed?	✓	
23	Whether index is correct?	✓	
24	Whether Security and Process Fee deposited? On _____	✓	
25	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On _____	✓	
26	Whether copies of comments/reply/rejoinder submitted? On _____	✓	
27	Whether copies of comments/reply/rejoinder provided to opposite party? On _____	✓	

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

Name: Mir Jinnat Safi

Signature: MJS

Dated: 02-05-2023

12

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 907/2023

SCANNED
KPST
Peshawar

ASIF ALI

VS

EDUCATION DEPTT:

INDEX

S.NO.	DOCUMENTS	ANNEXURE	PAGE
1	Memo of appeal	1- 4.
2	Affidavit	5.
3	Appointment order	A	6- 10.
4	Charge report	B	11.
5	Medical certificate	C	12.
6	Application	D	13.
7	Application & medical prescriptions	E & F	14- 16.
8	Explanation & reply	G & H	17- 18.
9	Application & forwarding letter	I & J	19- 20.
10	Discontinuation orders	K	21- 22.
11	Departmental appeal	L	23.
12	Impugned appellate order	M	24.
13	Order dated 06.11.2021	N	25.
14	Regularization Notification	O	26- 34.
15	Departmental appeal	P	35.
16	Wakalat nama	36.

APPELLANT

THROUGH:


MIR ZAMAN SAFI
ADVOCATE

13

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,

PESHAWAR

**Khyber Pakhtunkhwa
Service Tribunal**

APPEAL NO. 907 /2023

Diary No. 5044

Dated 2/5/2023

Mr. Asif Ali, SST (Bio-Chem) (BPS-16),

GHS Doag Payeen, Dir Upper.....APPELLANT

VERSUS

- 1- The Secretary, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The District Education Officer (M), District Dir Upper.
- 4- The District Account Officer, District Dir Upper.

.....RESPONDENTS

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED APPELLATE ORDER DATED 29.10.2021 WHEREBY THE APPELLANT HAS BEEN RE-INSTATED INTO SERVICE WITH IMMEDIATE EFFECT RATHER THAN FROM THE DATE OF DISCONTINUATION OF CONTRACT i.e. 08.03.2019 AND AGAINST THE IMPUGNED REGULARIZATION NOTIFICATION DATED 01.10.2022 WHEREBY THE SERVICES OF APPELLANT HAS BEEN REGULARIZED WITH EFFECT FROM 16.11.2021 INSTEAD OF FROM THE DATE OF 1ST APPOINTMENT i.e. 14.09.2018 AGAINST WHICH DEPARTMENTAL APPEAL OF THE APPELLANT IS UN-RESPONDED.

PRAYER:

It is, therefore, most humbly prayed that on acceptance of this appeal this august Tribunal may be pleased to:-

- I- Modified/rectified the impugned orders dated 29.10.2021 and 06.11.2021 to the extent that the appellant be re-instated into service w.e.f from 08.03.2019 with all back and consequential benefits.
- II- Also modified/rectified the impugned regularization Notification dated 01.12.2022 to the extent that the appellant be regularized w.e.f the date of 1st appointment i.e. 14.09.2018 in light of Rule-2.3 of the West Pakistan Pension Rules, 1963.
- III- Any other relief which this august Tribunal deems appropriate may also be granted in favor of the appellant.

R/SHEWETH:

ON FACTS:

Breif facts givin rise to the present appeal are as under:-

- 1- That the appellant was initially appointed against the post of SST (Bio-Chem) (BPS-16) on adhoc basis vide appointment order Endst: No. 583-89, dated 14.09.2018. That after appointment the appellant took over the charge against his respective post and started performing his duty at GHS Chukiatan, Dir Upper quite effeciently and upto the entire satisfaction of his superiors. Copies of the appointment order, charge report and medical certificate are attached as annexure.....**A, B & C.**
- 2- That the appellant while performing his duty became seriously ill and due to such illness the appellant was unable to perform his duty, therefore, the appellant preferred an application for leave before the authority concerened which returned back with the remarks that the appellant has already marked as absent from duty in the attendance register. Copy of the application is attached as annexure.....**D.**
- 3- That the appellant approached to the doctor concerned at Peshawar who advised the appellant for complete bed rest and as such on returned from Peshawar the appellant preferred another application alongwith medical prescriptions for one week leave and the same was sanctioned by the authority. Copies of the application and medical prescriptions are attached as annexure.....**E & F.**
- 4- That during such period the respondent No.3 called explanation from the appellant on 08.11.2018 which was properly replied by the appellant alongwith documentary proofs and denied the allegations leveled against him. Copies of the explanation and reply are attached as annexure.....**G & H.**
- 5- That it is pertinent to mention that due to bad health condition the appellant preferred another application for extra ordinary leave without pay for one month which was properly forwarded to the respondent No.2 but the same was refused without any lawful justification. Copies of the application and forwarding letter is attached as annexure.....**I & J.**
- 6- That after recovery from the said illness the appellant started performing his duty at the concerned school and regularly performed his duty till march, 2019 but astonishingly the respondnet No.2 issued order dated 08.03.2019 whereby the the contract of the appellant discontinued with effect from 24.10.2018. Copies of the orders are attached as annexure.....**K.**

- 7- That the appellant feeling aggrieved preferred departmental appeal which was partially accepted by the respondent No.2 vide appellate order dated 29.10.2021 whereby the appellant has been re-instated into service but with immediate effect as well as the intervening period w.e.f 08.03.2019 is hereby treated as leave without pay. That in continuation of the above mentioned appellate order the competent authority i.e. respondent No.3 issued re-instatement order of the appellant dated 06.11.2021 and the appellant adjusted in the far flund area of District Dir Upper i.e. GHS Doag Payeen, Dir Upper. Copies of the departmental appeal, appellate order and order dated 06.11.2021 are attached as annexure.....**L, M & N.**

- 8- That it is worth mentioning here that during service, the services of appellant has been regularized vide Notification dated 01.12.2022 w.e.f 16.11.2021 instead of from the date of initial appointment i.e. 14.09.2018 in light of Rule-2.3 of the West Pakistan Pension Rules, 1963. Copy of the Notification is attached as annexure.....**O.**

- 9- That the appellant feeling aggrieved preferred departmental appeal against the impugned regularization Notification dated 01.12.2022 but no reply has been received so far. Hence the present appeal on the following grounds amongst the others. Copy of the departmental appeal is attached as annexure.....**P.**

GROUND:

- A- That the impugned orders dated 29.10.2021, 06.11.2021 and regularization Notification dated 01.12.2022 are against the law, facts, norms of natural justice and materials on the record, hence not tenable and liable to be rectified/modified.

- B- That the appellant has not been treated by the respondent department in accordance with law and rules 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 impugned orders dated 29.10.2021, 06.11.2021 and regularization Notification dated 01.12.2022 are violative of the principle of natural justice.

- D- That the allegations leveled against the appellant has not been proved and the respondents admitted the illness of the appellant but despite that the appellant re-instated into service with immediate effect rather than retrospective effect i.e. with effect from 08.03.2019 and as such the intervening period has also been treated as leave without pay, which is discriminatory.

E- That the absence of appellant was not wilful but due to cause illness which has been admitted by the appellate authority, therefore, the appellant is fully entitled to be re-instated into service with effect from 08.03.2019 and also entitled for all financial back benefits.

F- That the appellant also discriminated in regularization Notification by regularizing from 16.11.2021 instead from the date of initial appointment i.e. 14.09.2018.

G- That the regularization of the appellant w.e.f 16.11.2021 is violative of Rule-2.3 of the West Pakistan Pension Rules, 1963.

H- 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 appellant may be accepted as prayed for.

APPELLANT


ASIF ALI

THROUGH:


MIR ZAMAN SAFI

ADVOCATE

CERTIFICATE:

It is, certified that no other earlier appeal was filed between the parties.


DEPONENT

LIST OF BOOKS:

- 1- CONSTITUTION OF PAKISTAN, 1973
- 2- SERVICES LAWS BOOKS
- 3- ANY OTHER CASE LAW AS PER NEED

17

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. _____ /2023

ASIF ALI

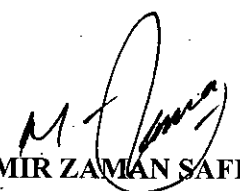
VS

EDUCATION DEPTT:

AFFIDAVIT

I **Mir Zaman Safi**, Advocate High Court, Peshawar on the instructions and on behalf of my client do hereby solemnly affirm and declare that the contents of this **service appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.




MIR ZAMAN SAFI
Advocate
High Court, Peshawar

18

A - 56

Dir Upper Male Appointment Order SST Adhoc

Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar



APPOINTMENT.

Consequent upon recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the post of Secondary School Teacher (SST Bio Chem), (SST Maths Phy), (SST General) School based in BPS-16 (Rs. 15880-1280-54280) @ Rs. 15880/- 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 with effect from the date of their taking over charge:-

(SST Bio Chem)

Sr#	RollNo	Name	NICH	Address	Academic Marks	NTS Marks	Total Marks	School Name
1	291002894	SALIM SAIF ULLAH	16102-9668224-1	ROOM NO 2 IMG HOSTEL PAK METERO LOGICAL DEPT UNIVERSITY ROAD KARACHI	72.92	67	139.92	GHSS Akhgram
2	351000391	MURAD KHAN	15701-9589501-1	MOHALLAH GIRLS HIGH SCHOOL BULGAR TEH DIR DISTT DIR UPPER	67.98	64	131.98	GHS Dobando
3	351000412	ASIF ALI	15701-8919531-1	VILL SHAMORGRA PO BIBYAWAR TEH DIR DISTT DIR UPPER	65.30	65	130.3	GHS Chukiatan
4	351000213	IFTIKHAR ANJUM	15701-1716301-9	VILL KATAN PAYEN CHUMRA P DARORA DIST AND TEHSIL AND UPPER DIR	67.72	62	129.72	GHSS Gandigar
5	351000158	IBAD UR RAHMAN	15701-9775558-3	HASAN DRUG HOUSE NEAR DHQ HOSPITAL MAIN BAZAR DIR UPPER	64.68	65	129.68	GHS Surbat
6	351000113	IQRAR ULLAH	15701-5395444-3	VILLAGE KALU BNANDI PO JABAR TEHSL DIR DSIRICT UPPERDIR	74.55	55	129.55	GHS Samkoot
7	351000367	FAYAZ KHAN	15701-0801476-1	VILLAGE AND P/O ALMAS TEHSIL AND DISTR UPPER DIR	61.64	67	128.64	GHS Aligasar
8	351000382	ASHFAQ AHMAD	15702-1463631-7	VILLAGE CANKASS TEH AND POST OFFICE WARI DISTT UPPER DIR	72.05	56	128.05	GHS Shang
9	351000290	WAHEED ARSHAD	15702-8282832-1	VILLAGE WARI TEH PO WARI	65.47	62	127.47	GHS Bibyawar
10	241000694	INAM UL HAQ	15702-8356963-3	VILLAGE GURRAI TEHSIL AND POST OFFICE WARI DIR LOWER	73.29	52	125.29	GHS Bandi (P)
11	271001274	TAHIR REHMAN	16101-9952274-3	VILL BAGH E HARAM PO ALO TEHSIL KATLANG DISTT MARDAN	65.23	60	125.23	GHSS Patrak
12	271001705	SHAKEEL AHMAD KHAN	15701-4858129-7	MOHALLAH BAZAR CHUM VILL DARORA DIST UPPER DIR	62.03	62	124.03	GHS Jelar
13	351000319	RIAZ KHAN	15702-6442308-3	VILL TANGI PO WARI DISTT UPPER DIR	64.57	58	122.57	GHS Molvi
14	351000261	TAHIR ULLAH	15701-5864716-7	VILL AND PO BIBYAWAR DIST UPPER DIR KPK	63.17	59	122.17	GHS Kair Dara
15	241000843	INAYAT ULLAH HAQ	15702-8162310-5	VILL GURRAI WARI P O WARI DISR U DIR	64.11	58	122.11	GHS Shinkarl
16	291001662	MUDASSIR ALAM	15702-1074118-7	NAVEED MEDICOSE WARI UPPER DIR	69.09	52	121.09	GHSS Sharingal
17	351000501	NISAR AHMAD	15701-8183885-3	VILLAGE CHERAGULI PAYEEN P O BIBYAWAR DIST AND TEH DIR UPPER	56.64	64	120.64	GHSS Sawnl
18	351000459	GHULASM ISHAQ	15702-3342174-5	VILLAGE AND PO AKHAGRAM TEHSIL WARI DIR UPPER	60.89	58	118.89	GHS Bela

Handwritten signature and stamp on the right side of the page.

19

67

Dir Upper Male Appointment Order SST Adhoc2

Sr#	RollNo	Name	NIC#	Address	Academic Marks	NTS Marks	Total Marks	School Name
19	281000533	MUHAMMAD AYAZ	15701-8462314-9	HOUSE NO 60 ARMOUR COLONY NO 2 HAKIMABAD NOWSHERA CANTT	64.61	54	118.61	GHSS Kalkot
20	351000155	SHAHZAD ZAKI	15704-5424207-1	VILLAGE PO AND TEH BRAWAL BANDI DIS DIR LOWER	57.31	61	118.31	GHS Shingara
21	351000406	FARMAN ALI	15701-8484005-3	PO DIR URBAN QUADI E AZAM MODEL SCHOO DIR UPPER	60.05	58	118.05	GHS Rokhan
22	351000337	ZIA UD DIN	15701-8340369-1	VILLAGE DOAG PAYEEN POST OFFICE SHIERNGAL DISTRICT DIR UPPER	63.22	54	117.22	GHS Baderkani
23	271002288	IBRAHIM KHAN	15701-2957084-7	VILL SHAHOOR PAYEEN POST OFFICE TEH SHERINGAL DISTT UPPER DIR KP	70.43	46	116.43	GHS Hayagi Sherqi
24	291001911	MUHAMMAD ISMAIL	15702-8159898-9	UMAR PHARMACY NEAR FRONTIER WOMEN UNIVERSITY QILLA BALA HESAR LRH	58.19	58	116.19	GHS Thali
25	351000486	FAZAL MANAN	15704-4275708-7	VILL BIN PAYEEN PO TEHSIL BARAWAL BANDI DIST DIR UPPER	63.79	52	115.79	GHS Janbhatti

(SST Maths Phy)

Sr#	RollNo	Name	NIC#	Address	Academic Marks	NTS Marks	Total Marks	School Name
1	352000212	NAGIB ULLAH	15701-9082466-7	VILLAGE AND PO HAYASERI TEH BALAMBAT	66.16	72	138.16	GHSS Sharingal
2	352000370	IRFAN UDDIN	15701-0792596-9	VILLAGE AND PO BIBYAWAR DISTT UPPER DIR	58.99	72	130.99	GHSS Ushera
3	352000392	MUJAHID KHAN	15702-5286812-9	C/O IJAZ HARDWAR CHAPPAR CHAK PO WARI TEH WARI	60.69	66	126.69	GHS Ossori
4	352000337	NISAR UL HAQ	15702-3835780-1	ROOM 63 RAHMAN BABA HOSTEL 2 UNIVERSITY OF EPSHAWAR	64.38	62	126.38	GHS Nagril
5	352000222	NISAR MUHAMMAD	15701-7886983-5	VILLAGE DARIKAND TEHSIL AND P.O BARAWAL BANDI DISTT	62.63	62	124.63	GHSS Patrak
6	352000045	ZAHEER ABBAS	15701-5947232-9	VILLAGE MASHANGO KASS TEH AND P/O BARAWALA BANDI DISTT DIR UPPER	64.96	59	123.96	GHS Shingara
7	352000338	SAJJAD AHMAD	15702-9485752-1	VILLAGE UMRALI PAYEN TEHSIL WAR UPER	65.79	58	123.79	GHS Jughabanj
8	292001775	SHAH ZAIB KHAN	15702-8773296-9	DIR MEDICOS TOWN RING ROAD YOUSAFABAD PESHAWAR	64.52	59	123.52	GHS Blrari
9	352000205	SHAKEEL AHMAD	15701-6847611-9	VILL AND POIST BIYAWAR DISTT	62.68	60	122.68	GHSS Sawni
10	352000138	SAJJAD KHAN	15701-3926542-1	ROOM NO 63 RAHMAN BABA HOSTLE 2 UNIVERISTY OF PESHAWAR	64.45	57	121.45	GHSS Qulandi
11	352000385	AMBAR KHAN	15703-2634511-7	VILL PO PATRAK TEH KALKOT DSIT DIR UPPER	64.24	55	119.24	GHS Barikot
12	352000281	ABID AYUB	15701-1857869-7	VILLAGE AND PO BOX BIBYAWAR DIR LOWER	66.08	53	119.08	GHS Bibyaware
13	242000416	MUHAMMAD IBRAHIM	15702-3722836-3	VILLAGE AND PO AKHAG RAM TEHSIL WARI DIR UPPER	61.67	57	118.67	GHSS Patrak
14	242000042	AYAZ ULLAH	15702-7382094-3	VILLAGE AND P/O SHAIBABAD TEH WARI DIT DIR UPPER	60.13	58	118.13	GHSS Gandigar
15	292000635	SAIF UR RAHMAN	15702-5995410-5	VILLAGE UMRALI PO TEHSIL WARI DISTT UPPER DIR	58.45	59	117.45	GHS Daskor

WZP
ATTESTED
 M
 D

(20)

(8) (8)

Dir Upper Male Appointment Order SST Adhoc3

Sr#	RollNo	Name	NIC#	Address	Academic Marks	NTS Marks	Total Marks	School Name
16	352000223	RASHID KHAN	15701-9800305-3	VILL PANAKOT PO QULANDI DISTT DIR TEH DIR UPPER	65.80	51	116.8	GHS Rokhan
17	292001948	SHAHID ALI SHAH	15704-8450459-1	ALLAMA IQBAL HOSTEL NO 9 ROOM 88 UNIVERSITY OF PESHAWAR	57.69	59	116.69	GHSS Pachakalay
18	352000232	ABDUL WADUD	15701-1268634-3	MOHALLHA QALA CHUKYATAN TEHSIL DIR DIST UPPER DIR	63.61	53	116.61	GHS Dobando
19	352000214	MUHAMMAD AYAZ	15702-9316795-5	VILLAGE UMARKOT PO TEHSIL WARI DSIT DIR UPPER	60.33	56	116.33	GHSS SharIngal
20	292001147	MUHAMMAD YASEEN	17301-9619046-3	P/O CITY RAILWAY STATION H 137 ST 3 MOH KHALID BIN WALID COLONY RING ROAD PESHAWAR	61.10	55	116.1	GHS Molvi
21	292001957	MUHAMMAD IMRAN	15702-5055248-9	HO NO 1575 ST 39 SECTOR 1/10/2 ISLAMABAD	57.46	58	115.46	GHS S S Khel
22	352000260	ASIF ANWAR	15702-5626900-7	VILLAGE KAKAD BANDA PO AND TEHSIL WARI DIR UPPER	63.38	52	115.38	GHS Darora
23	352000180	NAVEED ULLAH	15701-5778271-1	VILL REHANKOT PAYEEN PO DIR UPPER DISTT AND TEH DIR UPPER	65.95	49	114.95	GCMHSS Dir
24	352000168	ABDUL WARIS	15701-8362507-7	VILL SURBAT PAYEEN PO GAND RI DISTT AND TEH DIR U	58.82	56	114.82	GCMHSS Dir
25	352000124	IJAZ AHMAD	15702-3747539-5	VILG CHAPPER TEH AND P/O WARI DIST UPPER DIR	54.93	59	113.93	GHSS Nehag
26	212000079	SAMI UR RAHMAN	15704-5010803-3	VILLAGE AND P O BARAWAL BANDI	65.91	48	113.91	GHS Surbat
27	152000143	RASOOL KHAN	15703-0610687-7	CO MASOOD JAN QARI NEAR MIDDLE SCHOOL MAHMOOD ABAD UMRZAI	56.77	57	113.77	GHSS Beyar
28	352000143	JAN ZADA	15702-5393505-5	VILLAGE KOORBATAN P O AND TEH WARI	55.72	58	113.72	GHS Katan (B)
29	352000044	KHIZAR HAYAT	15701-2061598-3	SAMIULHAQ GO EMIS BRANCH DIST EDUCATION OFFICE DIR U	57.68	56	113.68	GHS Samkoot
30	292000668	KURSHID ALAM	15703-1833621-5	P O NAHAQI CHARSADA ROAD SHAH ALAM PUU GULSHAN MADINA COLONY PEHSAWAR	66.36	47	113.36	GHSS Kalkot
31	272000987	ATTA ULLAH	17101-4010571-7	VILL SHEIKHAN P/O DASEHRA DISTT AND TEHSIL CHARSADDA	57.02	56	113.02	GHS Thall
32	352000331	NAEEM ZADA	15702-8674333-3	VILLAGE GOGYAL TEHSIL WARI DISTRICT UPPER DIR	56.45	55	111.45	GHS Allgasar

(SST General)

Sr#	RollNo	Name	NIC	Address	Academic Marks	NTS Marks	Total Marks	School Name
1	293003459	AMJAD ALI	17301-3757870-3	SABEEN TRAVELS DIR MADEL TOWER BARMAT OFFCE NO 01 LR ROAD PESH	67.82	82	149.82	GHS Samkoot
2	354000494	WIQAS AHMED	15701-5492907-7	VILL KASS TEHSEEL AND DIS DIR UPPER C O ARSHAD ALI KPO DEPUTY COMMISSIONER OFFICR	68.73	79	147.73	GHS Rokhan
3	354000501	ZIA UR RAHMAN	15701-2860182-9	SAEED MEDICIPOS NEAR DISTT HEAD QUARTER DHQ HOSPITAL DIR TEH DIR DISTT DIR UPPE	70.52	77	147.52	GHS Sharmai

Handwritten signatures and stamps

21

89

Dir Upper Male Appointment Order SST Adhoc4

Sr#	RollNo	Name	NIC	Address	Academic Marks	NTS Marks	Total Marks	School Name
4	354000792	SAJAD ULLAH	15701-8908647-5	MATAKA COLELGE COLONY UPPER DIR	71.84	74	145.84	GHS Sharmai
5	354000404	KHURSHID ALI	15701-8388840-1	SHALIMAR PRINTING PRESS DIR TOWN TEHSIL DIR DIST UPPER DIR	63.53	80	143.53	GMS Doon Serai
6	293001816	HAFIZ UDDIN	15704-7615049-9	MAIN KOHATI GATE WAZIR BAGAH ROAD ZEB MEDICOSE PESHAWAR	69.73	71	140.73	GHSS Patrak
7	243000564	SAIF ULLAH	15702-4014111-3	VILLAGE MAJAL TEHSIL WARI DISTRICT DIR UPPER POST OFFICE SHINKAIRARI KORI	72.64	67	139.64	GMS Bandi Bala
8	354000803	USMAN GHANI	15701-8389965-1	USMAN SANATIORY STORE NEAR TELENOR FRANCHISE CHITRAL ROAD DIR	70.01	69	139.01	GHS Hayagi Sherqi
9	243001149	SANA ULLAH	15701-8290577-5	ZAIB HOUSE MOHALALH ZAIBABAD P O CHAKDARA TEH ADENZAI DIR LOWER	64.79	73	137.79	GHSS Ushera
10	354000486	AMJAD MAAZ	15701-4355311-5	VILLAGE SERI PO BIBYAMAR DIST AND TEHSIL DIR UPPER	65.76	72	137.76	GHS Molvi
11	354000685	IFTIKHAR KHAN	15701-7426210-9	VILLAGE AND POST OFFICE QULANDI TEH AND DST UPPER DIR	60.54	77	137.54	GHS Malanga
12	293003811	SADDAM HUSSAIN	15702-6616572-1	VILLAGE KAKAD THE AND P/O WARI DIST UPPER DIR	62.41	75	137.41	GHS Bandi (P)
13	353000558	AMIAD KHAN	15701-9466541-5	MOHALLAH JABBA VILLAGE AND P/O DARORA TEHH NAD DIT DIT UPEPR	66.79	70	136.79	GHS Samkoot
14	354000790	ABAID ULLAH	35201-4508761-3	HOSUE NO 189 LDA USMANABAD MUGHALPURA LHORE	54.42	82	136.42	GMS Gurrai
15	353000349	ROOHUL AMIN	15701-1843337-5	PO JABAR VILL ALMAS TEH DIR DIST UPPER	67.08	69	136.08	GHS Aligasar
16	353000360	FAZLI REHMAN	15702-5911683-3	THE CRESENT MODEL SCHOOL WARI DIST UPPER DIR	67.98	68	135.98	GHS Bandi (P)
17	354000374	ABDUL QAYUM	15701-5017034-7	VILL GLAKOR P/O TARPATAR DIST DIR UPPER	70.88	65	135.88	GMS Jarjuri
18	354000122	NIAZU DDIN	17102-8156674-1	PETAW KATIR P O SHERIGNAL TEHSIL SHERINGAL DISTRICT DIR UPPER	54.36	81	135.36	GHS Miana Doag
19	354000201	HANIF ULLAH	15702-5297251-3	VILLAGE UMARKOT TEHSIL AND PO WARI UPPER DIR	50.87	84	134.87	GHSS Beyar

TERMS & CONDITIONS.

1. NO TA/DA etc is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. Appointment is purely on temporary & contract basis initially for one year wef 20th September, 2018 to 19th September, 2019.
4. He should not be handed over charge if he exceeds 35 years or below 19 years of age. Age relaxation case may be submitted to competent authority.
5. If any candidate is over age less than two years, their upper age limit less than two years is hereby relaxed.
6. If any maritorious candidate is deprived from appointment by this order and the competent authority accepted his appeal, the appointment order of the low merit candidate will be withdrawn and adjustment order will be reviewed according to merit.
7. Appointment is subject to the condition that the certificate/documents must be verified from the concerned authorities by the DEO (concerned), any one found producing bogus Certificate will be reported to the law enforcing agencies for further action.
8. His services are liable to termination on one month's notice from either side. In case of resignation without notice his one-month pay/allowances shall be forfeited to the Government.

Handwritten signature

ATTENDED

22

10

Dir Upper Male Appointment Order SST Adhoc5

9. Pay will not be drawn until and unless a certificate to the effect by DEO(concerned) is issued that his certificates are verified
10. He should join his post within 15 days of the issuance of this notification. In case of failure to join the post within 15 days of the issuance of this notification, his appointment will expire automatically and no subsequent appeal etc shall be entertained.
11. The candidate concerned should produce Health & Age certificate duly signed by Medical Superintendent concerned before taking over charge.
12. He will be governed by the rules and regulations in the field and as may be issued from time to time by the Govt.
13. His contract shall be discontinued at any time, in case his performance is found unsatisfactory.
14. His appointment is made on School based, He will have to serve at the place of posting, and His service is not transferable to any other station.
15. Before handing over charge once again their document may be checked if they have not the required relevant qualifications as per rules, they may not be handed over charge of the post.

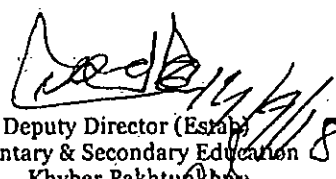
(Farid Ahmad Khattak)

Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst: No. 583-89. / File No.1/ /SST/Adhoc/Apptt:/2018 Dated Peshawar the 14 /09/2018.

Copy forwarded for information and necessary action to the: -

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Secretary Khyber Pakhtunkhwa Public Service Commission Peshawar.
3. District Education Officer (Male) concerned.
4. District Accounts Officer Concerned
5. Official Concerned.
6. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
7. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
8. M/File.


Deputy Director (Establishment)
Elementary & Secondary Education
Khyber Pakhtunkhwa


ATTESTED

(23)

B-(11)

"CHARGE REPORT"
(FOR NEW APPOINTEE ONLY)

Certified that Mr. Asif Ali S/O Sahibzada R/O Village Shamorgar Tehsil & District Dir Upper is hereby appointed against the posts of S.S.T (Bio Chem) on school based in (BPS-16) at Govt. High School Chukyatan, Dir Upper under the Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar endst: No.583-89/File No. 1/SST/Adhoc/Apptt:/2018, dated Peshawar the 14/09/2018.

(ASIF ALI)
S.S.T (Bio Chem)
Govt. High School Chukyatan
District Dir Upper

FOR HEAD OF THE SCHOOL ONLY


File No. 009-14

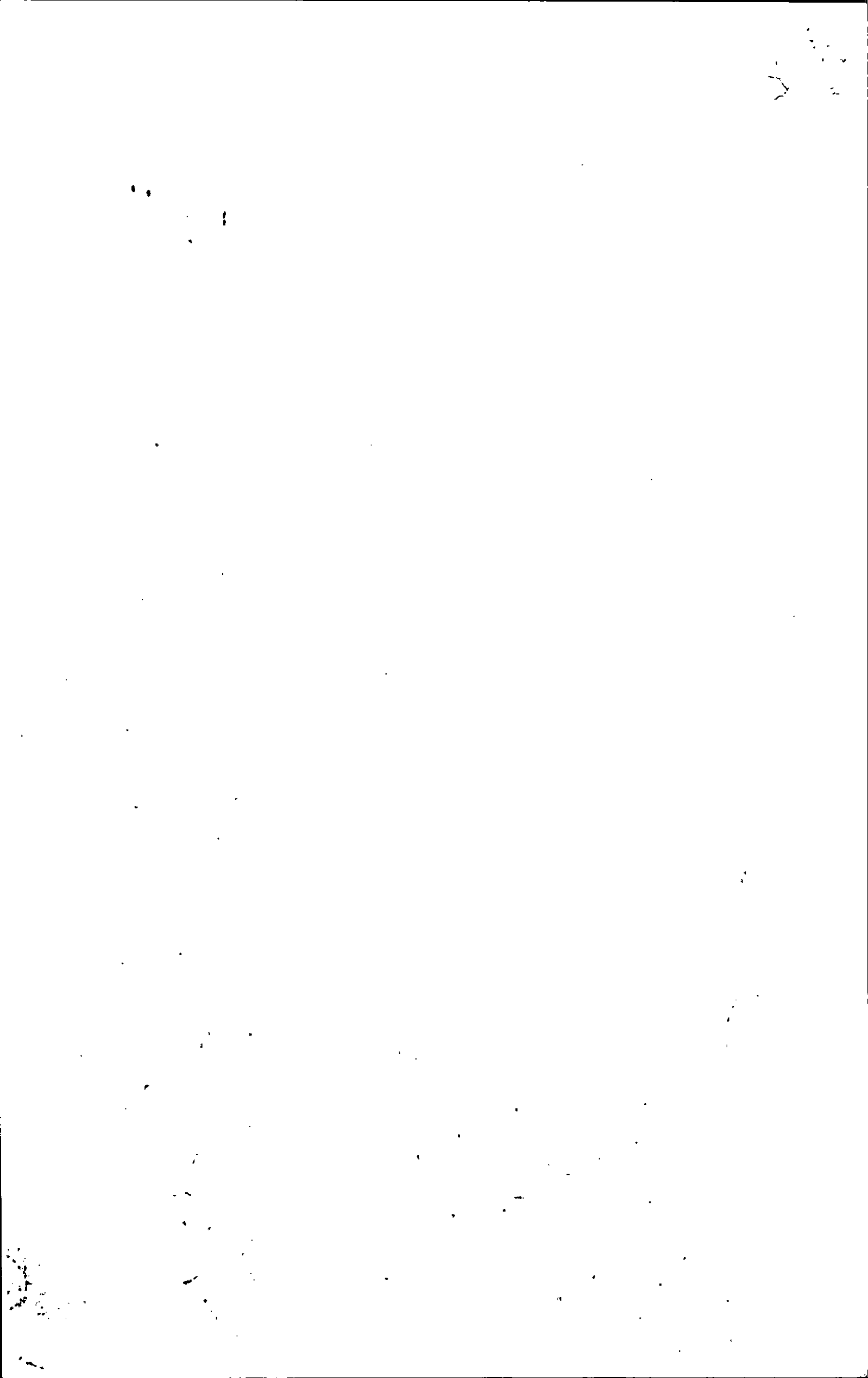
Certified that we have on the 15-09-2018 of this day at morning respectively and give a charge of post SST (Bio Chem) in above mentioned school to this charge report holder and received his required documents file for school record.


Master
Seal & Signature

Copy of the above forwarded for information to:-

- (i) The Directorate of Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- (ii) District Education Officer (M/F), Dir Upper.
- (iii) The District Account Officer Dir Upper
- (iv) The Principal Govt. High School Chukyatan.
- (v) Record copy.


ATTACHED



(27)

C-12

TS/MD-N/EP-27 FS-2000 P of 100-29-7-98-16

Page # 28

1100

MEDICAL CERTIFICATE

Name of Official Asif Ali

Cast or race Katani / Muslim

Father's Name Sahib Zada

Residence Village Shamogay P/o Bibyaway Tehsil
Dist. District Dir Upper

Date of Birth 13-02-1991

Exact height by measurement 5-11 ft

Personal mark of identification N/C

Signature of the official [Signature]

Signature of head of office

Seal of Officer.....

I do hereby certify that I have examined Mr. Asif Ali a candidate for employment in the office of the Distt. Education Deptt and cannot discover that he had any disease communicable of other constitutional affection or bodily infirmity except N/C

[Signature]

I do not consider this as disqualification for employment in the office of the Education Deptt His age according to own statement 28 years and by appearance about 28 year.



[Signature]
 Medical Superintendent
 Civil Hospital
[Signature]
 Medical Superintendent
 D.H.G Hospital
 Upper Dir 18

D-13

Page # 32

To,

The In-charge Head Teacher,

G.H.S, Chakyatam Dir (i)

Subject: Application for casual leave

R/sir, It is very humbly submitted that due to illness I am unable to attend the school for duties for the upcoming three (03) days and am proceeding to Peshawar for examination of treatment by the doctor to Peshawar.

It is therefore, requested to kindly grant me leave for the duration mentioned above and obliged

Yours obediently

Dated 24/10/18



Asif Ali
SST (Bio-Chem)

~~14/10/18~~
provides Sr

E-14

The District Education Officer
Distt. Durgapur

Subj. of application for leave

Respected Sir,

I am very sorry to hear that

is the application for leave as
DST Bioprocessory in Dept. of
Distt. Durgapur.

As per application received
the doctor has been advised to
rest of his leave on duty.

The application for leave
has been forwarded to the
competent authority for
approval.

It is requested that
you may be pleased to
grant the leave on duty.

Yours faithfully
[Signature]

[Signature]

ڈاکٹر علی احسان

ایم، بی، بی، ایس، ایف، پی ایس (پاک)
کلینک سائیکالوجسٹ
میڈیکل ڈائریکٹر عبادت ہسپتال پشاور

PMDC #13097-N

NOT VALID FOR
COURT PROCEEDINGS

پروفیسر ڈاکٹر خالد مفتی

ایف، آر، سی ٹریڈنگ (پکے)
چیف ایگزیکٹو: عبادت ہسپتال پشاور
انٹرنیشنل ڈسٹنگ ویڈ ٹیلوشپ آف امریکن سائیکالوجک ایسوسی ایشن
ڈیپٹھ ایچ او ٹیلوشپ (پیگ)
فارمر پریس خیر سیرٹیفیکیشن کالج پشاور

PMDC #399-N

Name: Asif Ali Age 27 Sex M Status M B.P. - Date 20/11/15

PT. ID 7455 Temp - Address: Diy

Rx

Cipro x 2x

- CTI

Stavog

Stavog

Secovent

Stavog

Stavog

Stavog

Mel

CTI

Stavog

M. A. F. E. D.

Dep +
Teal: of
M. A. F. E. D.

دوبارہ معائنہ ماہ کے بعد
نوٹ: ڈاکٹر کے مشورے کے بغیر دوائی بند نہ کریں

کلینک سائیکالوجسٹ
خاستہ نورین ایم، ایس، سی (سائیکالوجی)
ڈپلومہ ان کلینک سائیکالوجی

ناہرہ امراض دماغی نفسیات، ڈیپریشن، اعصاب، نفسیات و جنسیات، سر درد اور مرگی

تہ ہسپتال EE-32 نشتر آباد چوک، پشاور فون: 091-2561063

ibadathospituk@yahoo.com

16

13

Zahid Nazar

MBBS, FCPS, (Psychiatry)
PMDC Reg # 4265-N

NOT VALID FOR
MEDICO-LEGAL / COURT
PURPOSES

سایکاتریسٹ

ڈاکٹر زاہد نذر

ایم بی بی ایس، ایف سی ایس (پسائیٹری)

پریسکریپشن

درد، اضطراب، سوسائٹی فوبیا

رکی۔ شیٹ ڈسکریٹ

PROFESSOR

Department of Psychiatry,
Lady Reading Hospital
Rawalpindi.

29/10/2017

Ali

27/10/17

Dep. (Supp.)

CIPRALEX 20mg

(4) Serenace 50mg

درد کے لیے

درد

SUPREX 25mg

(5) Meprob 500mg

درد کے لیے

درد

MOSTON 25mg

(6) Symp Trener

درد کے لیے

درد کے لیے

درد کے لیے

درد کے لیے

Advice: keep rest
for one week w/o work

28/11/17

Handwritten signature

Professor Dr. Zahid Nazar
M.B.B.S., F.C.P.S. (Psych)
Dept of Psychiatry
M.T. LRI Peshawar

ڈاکٹر زاہد نذر (S.M.S) پشاور
Mob: 0300-5370334
پہلے 4:00 بجے شروع

کلینک: ہلال احمد بڈنگ فلیٹ نمبر 10 بانقلمیشن ہسپتال نیو ڈگری گارڈن پشاور

فون نمبر
0313-5522767
0334-9185322

D - (13)

Page # 32

To,

The in-charge Head Teacher,

G.H.S, Chakyatam Dir (i)

Subject: Application for casual leave

R/sir, It is very humbly submitted that due to illness I am unable to attend the school for duties for the upcoming three (03) days and am proceeding to Peshawar for examination & treatment by the doctor to Peshawar.

It is therefore, requested to kindly grant me leave for the duration mentioned above and obliged

Yours obediently

Dated 26/10/18

Asif Ali
SST (Bio-Chemistry)

(24)

G-17



OFFICE OF THE
DISTRICT EDUCATION OFFICER MALE DIR UPPER.
PH NO.0944-881400 FAX -0944-880411 Email deomdirupper@gmail.com

No. 8701 /F.No.36/DEO (M) Dir (U)/SEB Dated Dir (U) the; 8/11 /2018.

To.
Mr. Asif Ali,
SST (Bio, Chem.),
GHS Chukyatan Dir Upper.

Subject: - EXPLANATION.

Memo:-

As per report of the Head Master GHS Chukyatan Dir Upper that you remained away from your school duties w.e.f 24-10-2018 without sanction of leave. you are hereby directed to insure presence at your duty station otherwise strict disciplinary action will be taken against you under rules, 2011. Your this practice is against the office discipline and amounts to be guilty of inefficiency/misconduct and habitually absents yourself from duties without lawful approval for under section 3(d) of the Khyber Pakhtunkhwa Government servants (Efficiency and Discipline) Rules, 2011.

You are hereby directed to explain your position for such absence. Your reply explanation should reach to the undersigned within three days positively.

[Signature]
DISTRICT EDUCATION OFFICER,
(MALE) DIR UPPER.

No. 8702-6 /F.No.36/DEO (M) Dir (U)/SEB Dated Dir (U) the; 8/11 /2018.

- Copy to the:-
- 01- Director of Elementary & Secondary Education Khyber Pakhtunkhwa for information and further process please
 - 02- District Accounts Officer Upper Dir.
 - 03- District Monitoring Officer Dir Upper.
 - 04- Head Master GHS Chukyatin Dir Upper.
 - 05- Officials Concerned.

[Signature]
DISTRICT EDUCATION OFFICER,
(MALE) DIR UPPER.



(H-18)

The District Education Officer
Dir Upper.

Subject: EXPLANATION

Respected sir;

In reply to the explanation orders received from your good office vide No.8701/F.No.36/DEO (M) Dir (U)/SEB; dated 8/11/2018, regarding my nonappearance to the school duties without sanctioned leave. With due respect it is submitted that:

1. I have not been absent from duties for the period as reported by the school in-charge. In fact, I was absent on 24/10/2018 due to illness. The second day I submitted application to the school in-charge through my younger brother stating therein that I am proceeding to Peshawar for treatment but the same was returned with the remarks from the school in charge that District Monitoring Officer's staff has already marked him absent in attendance Register and the application couldn't be entertained (Annex-A)
2. On 26-29/10/2018, I was on the way to Peshawar and then in the hospital/doctor's clinic.
3. On 29/10/2018, I was examined by the doctor and advised for seven (07) days bed rest (Annex-B)
4. On returning from the hospital, I submitted my leave application to the school in-charge who forwarded the same to your good office and your good self sanctioned the leave with 29-10-2018 to 4-11-2018 (Annex-C).

In circumstances explained above, it is requested that on acceptance of the explanation, I may kindly be exonerated from the charge of absence from school duties reported by the School in-charge and awarded with forgiveness so as to remain careful in future.

Thanking You.

Yours obediently,

Asif Ali
 Asif Ali,
 SST (Bio-Chemistry)
 GHS, Chukyatan, Dir(U)

ADBEU
Spook
12/11/18

1133
13/11/18

[Handwritten signature]



I - (19)

The District Education Officer,
Dir Upper.

Subject: APPLICATION FOR EXTRAORDINARY LEAVE

11/12
11-11-18

Respected sir;

With due respect it is submitted that:

1. I was posted by your good office, against the vacant post of SST (Bio-Chemistry) in Govt: High School, Chukyatan Dir Upper on 15/09/2018 through NTS according the policy of the provincial Government and am performing duties since 20/ 09/2018 efficiently and devotedly.
2. During the course of my service I fall ill, I took leave for few days (Flag-A). After taking proper treatment, my health condition is now quite well & is improving. However recovery from the disease is expected to take time for which I need more leave.
3. According to Rule-09 of Leave Rules 1981, a government employee is entitled for extraordinary leave only when he/she has completed ten (10) years continuous service. (Flag-B). Rule-10 further states that:
In case a civil servant has not completed ten years continuous service extraordinary leave without pay for a maximum period of two years may be granted at the discretion of the head of his office (Flag-C).
4. According to sub-rule (2) of rule (9), extraordinary leave without pay for a maximum period may be granted, subject to the conditions stated therein, irrespective of the fact whether a civil servant is a permanent or a temporary employee. (Annex-D)

In the circumstances referred to above, it is requested that on acceptance of this application, one month leave without pay may please be granted.

No 8819 dated 14/11/18

Yours obediently,

Forwarded to The Director

BSE KP for reaction please

Handwritten notes and signatures on the left side of the page.

Distt. Education Officer
Male Dir Distt. Dir Upper

Asif Ali,
SST (Bio-Chemistry)
GHS, Chukyatan, Dir(U)

778
16.11.18
30/11
16/11

DD (11)
16
16

J-20

Directorate of Elementary & Secy: Education
Khyber Pakhtunkhwa, Peshawar
No. _____/FNo.112/SST (M) Comp/Dir Upper.
Dated Peshawar the 3/12 2018 1131

To

The District Education Officer,
(Male) Dir Upper.

Subject: - APPLICATION FOR EXTRA ORDINARY LEAVE.
Memo;


I am directed to refer to your letter No. 8819 dated 14-11-2018 on the subject cited above and to state that Mr. Asif Ali SST (Bio/Chem) at GHS, Chukyatan on adhoc/contract basis and he has not entitled for Extra ordinary leave as per existing rules.

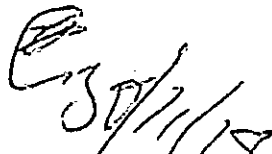
In this regard, I am further directed to ask you to inform the SST concerned and ensure presence of the SST concerned in the School otherwise, discontinuation of his contract may be furnished to this Directorate for further necessary action.


Endst: No. 1132

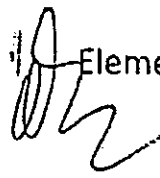
Copy of the above is to:-

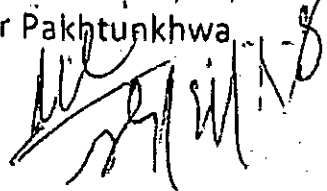
1. PA to Director (E&SE) Khyber Pakhtunkhwa, Peshawar.


Deputy Director (Estab)
Elementary & Secondary Education
Khyber Pakhtunkhwa.


Deputy Director (Estab)
Elementary & Secondary Education
Khyber Pakhtunkhwa.

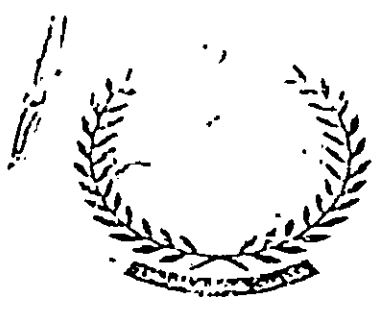

NOTED





(33)

K-21



Directorate of Elementary and Secondary Education
كھيبر پاكستان كھنوا پشاور

OFFICE ORDER.

The contract in respect of Mr. Asif Ali SST (Bio. Chem) GHS Chokyatun District Dir Upper is hereby discontinued with effect from 20-11-2017 i.e. 21-10-2018 as reported by the District Education Officer (Male) Mardan vide No. 1131-32 dated 22-12-2018.

Director

Endst: No. 2224 / File No. 112/SST (M) Complaint Dir Upper
Dated Peshawar 3/3 /2019

Copy forwarded for information and necessary action to the:-

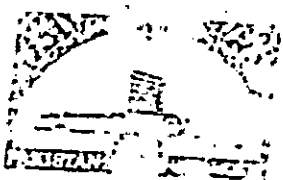
1. Accountant General Khyber Pakhtunkhwa, Peshawar.
2. District Education Officer (Male) Dir Upper.
3. District Accounts Officer Dir Upper
4. Principal GHS Chokyatun District Dir Upper
5. Official concerned.
6. PS to Secretary to Govt. of Khyber Pakhtunkhwa, E&S, Department, Peshawar.
7. PS to Director Local Director etc
- Master etc.

ADDC (S&A) - 1
DO as directed
16/3

[Signature]
Dy. Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

[Signature]
17/7/19

[Signature]
RECEIVED



(34)

K

(22)



**Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar**

OFFICE ORDER.

To be substituted with the same No. and date.

The contract in respect of Mr. Asif Ali SST (Bio/Chem) GHS. Chokyatin District Dir Upper is hereby discontinued w.e.f. 24-10-2018 as reported by the District Education Officer (Male) Dir Upper vide No. 1131-32 dated 22-12-2018.

Director

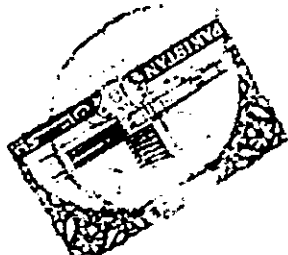
Endst: No. 2224-30/ File No. 112/SST (M) Complaint Dir Upper
Dated Peshawar 08-03-2019

Copy forwarded for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa, Peshawar.
2. District Education Officer (Male) Dir Upper.
3. District Accounts Officer Dir Upper.
4. Principal GHS Chokyatin District Dir Upper.
5. Official concerned.
6. PS to Secretary to Govt. of Khyber Pakhtunkhwa, E&SE Department, Peshawar.
7. PA to Director Local Directorate.
8. Master File.

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

14/3/19



me 2019

35

L-23

135

To,

The Director (Elementary & Secondary Education),
Khyber Pakhtunkhwa.

Subject: APPLICATION FOR REVISION OF DISCONTINUATION ORDER NO 33324-30 DATED 08/03/2019 & RE-INQUIRY AND RESTORATION OF SERVICE AFTER RE-INQUIRY.

Reference your good office order mentioned in the caption line, it is Very humbly submitted that:

1. I was appointed as SST (Bio/Chem) on 14/09/2018, submitted my arrival report on 15/09/2018 and performed duties till 24/10/2018 without fail.
2. On dated 24/10/2018. I fall ill and applied for medical leave which was accepted and leave granted till 11/11/2018.
3. Later on, I applied for one month more leave, the District Education Officer forwarded my application to your good office, however the same was not accepted and I re-continued my duties but the school In-charge disallowed me to put my attendance in the Attendance Register; saying that the DEO has verbally directed him not to allow you till clearance of the case of your absence and leave.
4. In ^{March 2019} ~~December, 2018~~ the school new in-charge allowed me for attendance and as such I have been putting my signs in the attendance register till date.

From the aforesaid communiqué, it is clear that the school in-charge and the then DEO on political biasness, misreported me to have been absent and has leveled baseless charges against me at first; the date w.e.f 20/11/2017 mentioned in your good office order is not correct I have taken charger in 2018 not 2017 and also I have not been absent from duties w.e.f 24/10/2018 rather I was on leave .

It is therefore requested that on acceptance of this appeal, your office order of discontinuation in my respect my please be-reviewed, and the District Education Officer Dir may kindly be directed to re-inquire into the subject matter.

Dated 21/03/2019

Obediently Yours,

ATIL-ED

Asif Ali SST (Bio/Chem),
GHS Cukyatan, Upper Dir.

36

M-24



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
Dated Peshawar the 29-10-2021

NOTIFICATION

No.SO/PEES-I.Gen-Miss/Appeals/Speaking Order/Mr.Asif Ali, SST/2021:-

1. WHEREAS, Mr. Asif Ali ex-SST (Bio Chem) BPS-16 has submitted an appeal to the appellate authority for re-instatement into service.

2. AND WHEREAS, while posted at GHS Chukistan, Dir Upper the appellant had applied for grant of leave on Medical Grounds as advised by the Doctors. However, DEO (M) Upper Dir initiated disciplinary action against the appellant and recommended withdrawal of his contractual appointment to the Directorate E&SE.

3. AND WHEREAS, on the recommendation of the DEO (M) Dir Upper, the Directorate of E&SE, Khyber Pakhtunkhwa had discontinued contractual appointment of the appellant vide office order No. 222430 F.No.112 SST(M)Complaint Dir Upper, dated 08.03.2019.

4. AND WHEREAS, the appellant was provided with an opportunity of personal hearing through Mr. Rahmat Ali Wazir, Deputy Secretary (Assembly Business), E&SE Department, Khyber Pakhtunkhwa on 22.06.2021.

5. AND WHEREAS, the appellate authority, after examination of record and pros and cons of the case, has found that the appellant has been discriminated with regard to his request for leave on medical grounds.

6. NOW, THEREFORE, in exercise of the powers conferred under rule 17 (2A) of Efficiency & Discipline Rules, 2011, the appellate authority (Secretary E&SE) has been pleased to restore the contractual appointment of Mr. Asif Ali as SST (Bio Chem) (BPS-16) in E&SE Department District Dir Upper with immediate effect. The intervening period w.e.f 08.03.2019 is hereby treated as leave without pay as provided under FR-54 (b).

SECRETARY
ELEMENTARY & SECONDARY EDUCATION

Ends: No & date even:

Copy forwarded to:

1. The Director, Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar.
2. The District Education Officer (M) Dir Upper.
3. The District Accounts Officer, Dir Upper.
4. The PS to Secretary, E&SED Khyber Pakhtunkhwa.
5. The PA to Additional Secretary (Estab), E&SED, Khyber Pakhtunkhwa.
6. The PA to Additional Secretary (General), E&SED, Khyber Pakhtunkhwa.
7. The PA to Deputy Secretary (A B) E&SED, Khyber Pakhtunkhwa.
8. Mr. Asif Ali SST(B C) BPS-16, Chukistan, District Dir Upper.

ATTE
Milan Hussain (Din)
SECTION OFFICER
29-10-2021

37

M-25



GOVERNMENT OF KHYBER PAKHTUNKHWA
OFFICE OF THE DISTRICT EDUCATION OFFICER
MALE DIR UPPER

PH No. 0944-881400

E-mail: deomdirupper@gmail.com



OFFICE ORDER:

In acceptance of appeal by worthy secretary E&SE Govt: of Khyber Pakhtunkhwa vide No.SO (PR)/5-1/Gen-Misc/Appeals/Speaking order/ Mr. Asif All SST/dated 29-10-2021, The contractual appointment of Mr. Asif All SST (Bio: Chem:) has been restored by Secretary Elementary & Secondary Education Khyber Pakhtunkhwa, adjusted at Govt: High School Doag Payeen Dir Upper against vacant SST (Bio: Chemistry) post w.e.f 01-11-2021, the entire period w.e.f 08-03-2019 to 31-08-2021 has been converted into leave without pay in the light of above afore mentioned notification.

Note:-

- 01- Charge report should be submitted to all concerned.
- 02- No TA/DA is allowed.

/

(MUHAMMAD ASHRAF)
DISTRICT EDUCATION OFFICER
(MALE) DIR UPPER.

Endst No. 4103-4106 /F.No.15/DEO (M)/Estb (S) Dated: 06 / 11 / 2021.
Copy forwarded for information to the:-

- 03- Director of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- 04- District Accounts Officer Dir Upper.
- 05- Principal/Head Master/In-charge concerned.
- 06- Teachers concerned.

m
ATTENDED

/

DISTRICT EDUCATION OFFICER
(MALE) DIR UPPER.

38

0-26



Regularization of Adhoc SST of District Dir Upper (Male) 2022

Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Notification

Under the provision of the Khyber Pakhtunkhwa Teachers (Appointment and Regularization of Services) Act, 2022 (Khyber Pakhtunkhwa Act No.XLI of 2022), the services of the following Secondary School Teachers Male (SST Bio/Chem BPS-16, SST Maths/Phy BPS-16, SST General BPS-16 and SST IT BPS-16 appointed on Adhoc/Contract basis w.e.f 08/03/2017, are hereby regularized in Teaching Cadre on the terms and conditions given below with effect from the date of their initial appointment till the commencement of the Act ibid:

2018 SST General										
S. #	Roll #	Name Of SST	Father Name	CNIC	D.O.B	Total Marks	School	Adv.No and Date	Applt Order No and Date	Extension Order No and Date
1.	354000 494	Wiqas Ahmed	Bakht Biland	15701-5492907-7	10-04-91	147.73	GHS Rokhan	INF(P) 6749/2017	583-89 date 14-09-2018	786-92 dated 16-11-21
2.	354000 792	Sajad Ullah	Ibadat Jan	15701-8908647-5	15-03-92	145.84	GHS Sharmai	INF(P) 6749/2017	583-89 date 14-09-2018	786-92 dated 16-11-21
3.	354000 404	Khurshid Ali	Muhammad Rafiq	15701-8388840-1	06-10-92	143.53	GMSJarjuri	INF(P) 6749/2017	583-89 date 14-09-2018	786-92 dated 16-11-21
4.	293001 816	Hafiz Uddin	Sangeen Khan	15704-7615049-9	29-01-90	140.73	GHSS Patrak	INF(P) 6749/2017	583-89 date 14-09-2018	786-92 dated 16-11-21
5.	243000 564	Saif Ullah	Gul Rahim	15702-4014111-3	01-02-89	139.64	GMSBandi Bala	INF(P) 6749/2017	583-89 date 14-09-2018	786-92 dated 16-11-21
6.	354000 803	Usman Ghani	Badshah Ud Din	15701-8389965-1	18-03-90	139.01	GHS Hayagi Sherqi	INF(P) 6749/2017	583-89 date 14-09-2018	786-92 dated 16-11-21
7.	354000 486	Amjad Maaz	Muhammad Tahir	15701-4355311-5	01-05-94	137.76	GHS Molvi	INF(P) 6749/2017	583-89 date 14-09-2018	786-92 dated 16-11-21
8.	354000 685	Ifrikhar Khan	Habib Ullah Khan	15701-7426210-9	23-04-92	137.54	GHS Malanga	INF(P) 6749/2017	583-89 date 14-09-2018	786-92 dated 16-11-21
9.	293003 811	Saddam Hussain	Talib Jan	15702-6616572-1	20-03-93	137.41	GHS Bandi (P)	INF(P) 6749/2017	583-89 date 14-09-2018	786-92 dated 16-11-21
10.	353000 558	Amjad Khan	Sham Sher Khan	15701-9466541-5	16-05-89	136.79	GHS Samkoot	INF(P) 6749/2017	583-89 date 14-09-2018	786-92 dated 16-11-21
11.	354000 790	Abaid Ullah	Sharif Ullah	35201-4508761-3	02-03-89	136.42	GMSGurrai	INF(P) 6749/2017	583-89 date 14-09-2018	786-92 dated 16-11-21
12.	353000 349	Roohul Amin	Abdul Sattar	15701-1843337-5	10-09-92	136.08	GHS Samkoot	INF(P) 6749/2017	583-89 date 14-09-2018	786-92 dated 16-11-21
13.	353000 360	Fazli Rehman	Malook Khan	15702-5911683-3	20-01-87	135.98	GHS Bandi (P)	INF(P) 6749/2017	583-89 date 14-09-2018	786-92 dated 16-11-21

Scanned with CamScanner
ATTESTED

39

27

Regularization of Adhoc SST of District Dir Upper (Male) 2022

14.	354000 374	Abdul Qayum	Muhammad Din	15701- 5017034-7	04-02-91	135.88	GHS Aligasar	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
15.	354000 122	Niaz Ddin	Umar Sadiq	17102- 8156674-1	15-04-89	135.36	GHS Miana Doag	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
16.	354000 201	Hanif Ullah	Toti Rahman	15702- 5297251-3	09-01-86	134.87	GHSS Beyar	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
17.	354000 003	Marajul Muik	Jalilur Rahman	17301- 1363561-9	06-04-79	134.42	GMS Doon Seri	INF(P) 6749/2017	3655- 61 dated 11-12- 2018	4600-4 dated 05- 08-2022
18.	354000 689	Tariq Ullah	Muhammad Sherin	15702- 4006079-3	14-11-91	133.36	GHS Sharmai	INF(P) 6749/2017	3655- 61 dated 11-12- 2018	4600-4 dated 05- 08-2022

2018 SST Bio/Chem

S. #	Roll #	Name Of SST	Father Name	CNIC	D.O.B	Total Marks	School	Adv.No and Date	Apptt Order No and Date	Extension Order No and Date
1.	351000 391	Murad Khan	Tila Muhammad	15701- 9589501-1	01-01-94	131.98	GHS Dobando	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
2.	351000 213	Ifrikhar Anjum	Noor Muhammad	15701- 1716301-9	03-03-90	129.72	GHSS Gandigar	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
3.	351000 158	Ibad Ur Rahman	Fazal Karim	15701- 9775558-3	28-10-93	129.68	GHS Surbat	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
4.	351000 367	Fayaz Khan	Painda Khan	15701- 0801476-1	02-02-90	128.64	GHS Aligasar	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
5.	351000 382	Ashfaq Ahmad	Namoos Khan	15702- 1463631-7	20-01-90	128.05	GHS Shang	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
6.	351000 290	Waheed Arshad	Gul Bahisht	15702- 8282832-1	10-05-92	127.47	GHS Akhagram	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
7.	241000 694	Inam Ul Haq	Rashid Ahmad	15702- 8356963-3	01-04-91	125.29	GHS Bandi (P)	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
8.	271001 274	Tahir Rehman	Umar Bacha	16101- 9952274-3	15-02-92	125.23	GHSS Patrak	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
9.	271001 705	Shakeel Ahmad Khan	Said Azim Khan	15701- 4858129-7	04-04-94	124.03	GHS Jelar	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
10.	351000 319	Riaz Khan	Taj Muhammad	15702- 6442308-3	09-04-85	122.57	GHS Molvi	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
11.	351000 261	Tahir Ullah	Shafi Ullah	15701- 5864716-7	10-05-93	122.17	GHS Kair Dara	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
12.	241000 843	Inayat Ullah Haq	Hafiz Rashid Ahmed	15702- 8162310-5	01-04-93	122.11	GHS Shinkari	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
13.	291001 662	Mudassir Alam	Akhtar Muhammad	15702- 1074118-7	02-05-89	121.09	GHSS Sharingal	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21

ATTACHED

40

28

Regularization of Adhoc SST of District Dir Upper (Male) 2022

14.	351000 501	Nisar Ahmad	Naik Muhammad	15701- 8183885-3	20-08-89	120.64	GHSS Sawni	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
15.	281000 533	Muhammad Ayaz	Muhammad Umar	15701- 8462314-9	28-01-91	118.61	GHSS Kalkot	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
16.	351000 155	Shahzad Zaki	Fazli Jalal	15704- 5424207-1	10-02-93	118.31	GHS Shingare	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
17.	351000 406	Farman Ali	Aziz Ur Rahman	15701- 8484005-3	15-10-91	118.05	GHS Rokhan	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
18.	351000 337	Zia Ud Din	Khaista Rahman	15701- 8340369-1	20-05-93	117.22	GHS Baderkani	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
19.	291001 911	Muhammad Ismail	Khaista Bacha	15702- 8159898-9	03-04-88	116.19	GHS Thal	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
20.	351000 486	Fazal Manan	Fazal Subhan	15704- 4275708-7	16-08-92	115.79	GHS Janbhatti	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
21.	351000 193	Yasir Fahim	Bakht Zada	15703- 0499564-7	17-03-92	115.06	GHS Hayagai Sh	INF(P) 6749/2017	3655- 61 dated 11-12- 2018	4600-4 dated 05- 08-2022
22.	351000 106	Rajab Khan	Sahib Zada	15701- 4288258-9	05-04-92	126.56	GHS Bibiyawar	INF(P) 6749/2017	3655- 61 dated 11-12- 2018	4600-4 dated 05- 08-2022

2018 SST Maths/Physics

S. #	Roll #	Name Of SST	Father Name	CNIC	D.O.B	Total Marks	School	Adv.No and Date	Apptt Order No and Date	Extension Order No and Date
1.	352000 370	Irfan Uddin	Azad Bakht	15701- 0792596-9	06-12-90	130.99	GHSS Usherat	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
2.	352000 392	Mujahid Khan	Afsar Khan	15702- 5286812-9	05-02-89	126.69	GHS Ossori	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
3.	352000 337	Nisar Ul Haq	Siraj Ul Haq	15702- 3835780-1	12-11-94	126.38	GHS Nagril	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
4.	352000 045	Zaheer Abbas	Sultan Room	15701- 5947232-9	03-05-95	123.96	GHS Shinagara	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
5.	352000 338	Sajjad Ahmad	Said Muhammad	15702- 9485752-1	18-03-93	123.79	GHS Jughabanj	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
6.	292001 775	Shah Zaib Khan	Muhammad Khaliq	15702- 8773296-9	01-05-92	123.52	GHS Birari	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
7.	352000 205	Shakeel Ahmad	Muhammad Ishaq	15701- 6847611-9	05-05-91	122.68	GHSS Sawni	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
8.	352000 138	Sajjad Khan	Amanullah Khan	15701- 3926542-1	02-06-94	121.45	GHSS Qulandi	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
9.	352000 385	Ambar Khan	Mutabar Khan	15703- 2634511-7	03-03-92	119.24	GHSS Patrak	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
10.	242000 416	Muhammad Ibrahim	Khaista Pacha	15702- 3722836-3	08-04-89	118.67	GHSS Patrak	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
11.	242000 042	Ayaz Ullah	Muhammad Zahir Khan	15702- 7382094-3	25-03-94	118.13	GHSS Gandigar	INF(P) 6749/2017	583-89 date 14-	786-92 dated 16-

Handwritten signature

AMENDED

41

29

Regularization of Adhoc SST of District Dir Upper (Male) 2022

									09-2018	11-21
12.	292000 635	Saif Ur Rahman	Amin Ur Rahman	15702- 5995410-5	28-03-88	117.45	GHS Daskor	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
13.	352000 223	Rashid Khan	Nasib Khan	15701- 9800503-3	03-05-93	116.8	GHS Rokhan	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
14.	292001 948	Shahid Ali Shah	Mohammad Rahim Shah	15704- 8450459-1	01-11-93	116.69	GHSS Pachakalay	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
15.	352000 232	Abdul Wadud	Aziz Ullah	15701- 1268634-3	15-01-88	116.61	GHS Dobando	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
16.	352000 214	Muhammad Ayaz	Muhammad Khaliq	15702- 9316795-5	01-02-87	116.33	GHSS Sharingal	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
17.	292001 147	Muhammad Yaseen	Abdul Jabbar	17301- 9619046-3	12-11-91	116.1	GHS Molvi	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
18.	292001 957	Muhammad Imran	Saz Malook	15702- 5055248-9	23-09-85	115.46	GHS Ss Khel	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
19.	352000 260	Asif Anwar	Anwar Khitab	15702- 5626900-7	30-03-91	115.38	GHS Darora	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
20.	352000 180	Naveed Ullah	Khanim Ullah	15701- 5778271-1	05-04-93	114.95	GCMHSS Dir	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
21.	352000 124	Ijaz Ahmad	Shah Wazir Khan	15702- 3747539-5	03-05-92	113.93	GHSS Nehag	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
22.	212000 079	Sami Ur Rahman	Habib Ur Rahman	15704- 5010803-3	10-04-92	113.91	GHS Surbat	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
23.	152000 143	Rasool Khan	Khan Malook	15703- 0610687-7	02-07-94	113.77	GHSS Beyar	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
24.	352000 044	Khizar Hayat	Abdur Rauf	15701- 2061598-3	10-01-91	113.68	GHS Samkoot	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
25.	292000 668	Khurshid Alam	Muhammad Alam	15703- 1833621-5	02-12-89	113.36	GHSS Kalkot	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
26.	272000 987	Atta Ullah	Fazal Ghafoor	17101- 4010571-7	10-08-93	113.02	GHS Thall	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
27.	352000 331	Naeem Zada	Aqal Zada	15702- 8674333-3	04-07-94	111.45	GHS Aligasar	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
28.	152000 113	Muhammad Abbas	Latiful Islam	15701- 3028860-9	10-03-94	113.14	GHS Barikot	INF(P) 6749/2017	3655- 61 dated 11-12- 2018	4600-4 dated 05- 08-2022
29.	282000 239	Altaf Ahmad	Sultan Muhammad	15701- 3734545-3	05-09-92	113.18	GHS. Bibyawar	INF(P) 6749/2017	3655- 61 dated 11-12- 2018	4600-4 dated 05- 08-2022
30.	352000 191	Shahzada Khalid	Saeedullah	15701- 3299090-1	02-03-93	108.59	GHSS Gamseer	INF(P) 6749/2017	3655- 61 dated 11-12- 2018	4600-4 dated 05- 08-2022

2019 SST Bio/Chem

[Handwritten signature]

S. #	Roll #	Name Of SST	Father Name	CNIC	D.O.B	Total Marks	School	Adv.No and Date	Appt Order No and Date	Extension Order No and Date
------	--------	-------------	-------------	------	-------	-------------	--------	-----------------	------------------------	-----------------------------

42

30

Regularization of Adhoc SST of District Dir Upper (Male) 2022

1.	791800 11	Maqsood Iqbal	Anwar Zada	15702- 7014671-9	05-05-95	127.57	GHSS Wari	INF(P) 2281/19	1640- 1705 Dated 09-08- 2019	*N.A
----	--------------	------------------	------------	---------------------	----------	--------	-----------	-------------------	--	------

2020 SST General

S. #	Roll #	Name Of SST	Father Name	CNIC	D.O.B	Total Marks	School	Adv.No and Date	Apptt Order No and Date	Extension Order No and Date
1.	232700 140	Saddam Hussain	Khaista Khan	15701- 9283659-5	20-05-93	151.1 5	GHSS Nehag	INF(P) 2281/19	1442-49 date 13- 05-2020	136-40 dated 13- 06-2022
2.	182700 883	Noor Zada	Khan Zada	15701- 7827974-7	01-01-93	150.7 6	GHSS Sheringal	INF(P) 2281/19	1442-49 date 13- 05-2020	136-40 dated 13- 06-2022
3.	232700 410	Zia Ur Rahman	Saif Ur Rahman	16102- 8169936-5	28-04-90	150.3	GHSS Beri	INF(P) 2281/19	1442-49 date 13- 05-2020	136-40 dated 13- 06-2022
4.	232701 234	Asif Navaz	Badshah Zada	15701- 7145742-9	25-04-91	148.1 2	GHS Karkabanj	INF(P) 2281/19	1442-49 date 13- 05-2020	136-40 dated 13- 06-2022
5.	232700 026	Ibad Ullah	Bakhtiar Ullah Khan	15701- 6108643-3	20-01-90	146.9 1	GHSS Nehag	INF(P) 2281/19	1442-49 date 13- 05-2020	136-40 dated 13- 06-2022
6.	232701 309	Sayed Ijaz Ahmad	Toti Muhammad	15702- 3150539-5	17-05-92	145.1 3	GHS Mattar	INF(P) 2281/19	1442-49 date 13- 05-2020	136-40 dated 13- 06-2022
7.	232700 184	Aziz Khan	Itbar Khan	15701- 8677147-1	02-01-84	143.3 6	GHS Jelar	INF(P) 2281/19	1442-49 date 13- 05-2020	136-40 dated 13- 06-2022
8.	232701 514	Sajid Zaman	Umer Zaman Zahid	17301- 5209220-7	20-10-92	143.3 3	GHS Mattar	INF(P) 2281/19	1442-49 date 13- 05-2020	136-40 dated 13- 06-2022
9.	232700 311	Zeezhan Ali	Haidar Ali Shah	15701- 9629760-7	06-03-92	143.2 3	GHS Jelar	INF(P) 2281/19	1442-49 date 13- 05-2020	136-40 dated 13- 06-2022
10.	232700 587	Liaqat Zareen	Shah Zareen	15701- 7179169-3	06-05-94	142.5 7	GHSS Nehag	INF(P) 2281/19	1442-49 date 13- 05-2020	136-40 dated 13- 06-2022
11.	232700 972	Ejaz Ul Haq	Irfan Ud Din	15701- 3958240-7	20-01-93	142.3 8	GHS Jelar	INF(P) 2281/19	1442-49 date 13- 05-2020	136-40 dated 13- 06-2022
12.	232700 815	Hizbullah	Abdullah Khan	15701- 8969929-1	02-06-92	142.2 8	GHS Ganshall	INF(P) 2281/19	1442-49 date 13- 05-2020	136-40 dated 13- 06-2022
13.	232700 639	Ijaz Ul Haq	Bakht Munir	15701- 8857813-5	01-07-90	142.2	GHS Sperko	INF(P) 2281/19	1442-49 date 13- 05-2020	136-40 dated 13- 06-2022
14.	232701 430	Muhamma d Ayaz	Muhammad Essa Khan	15703- 7844860-5	01-01-92	141.6 2	GMS Sundari	INF(P) 2281/19	1442-49 date 13- 05-2020	136-40 dated 13- 06-2022

ATTACHED
Scanned with CamScanner

43

31

Regularization of Adhoc SST of District Dir Upper (Male) 2022

2020 SST Bio/Chem

S. #	Roll #	Name Of SST	Father Name	CNIC	D.O.B	Total Marks	School	Adv.No and Date	Applt Order No and Date	Extension Order No and Date
1.	181800488	Lal Zaman Khan	Zevar Khan	15702-9246637-1	18-01-95	137.16	GHSS Wari	INF(P) 2281/19	1442-49 date 13-05-2020	136-40 dated 13-06-2022
2.	231800446	Inayat Ur Rahman	Muhammad Alam	15701-0565770-5	01-06-88	135.12	GHS Achar Bala	INF(P) 2281/19	1442-49 date 13-05-2020	136-40 dated 13-06-2022
3.	231800208	Liaqat Ahmad	Mukhtar Ahmad	15701-4415023-5	01-10-91	134.84	GHS Doon Bala	INF(P) 2281/19	1442-49 date 13-05-2020	136-40 dated 13-06-2022
4.	231800053	Ijaz Ahmad	Mukhtar Ahmad	15701-2072602-5	25-09-94	132.17	GHSS Swani	INF(P) 2281/19	1442-49 date 13-05-2020	136-40 dated 13-06-2022
5.	231800184	Sahibzada Fahim Ullah	Sahibzada Inayat Ullah	15701-9737587-3	01-11-79	131.33	GHS Rehankot	INF(P) 2281/19	1442-49 date 13-05-2020	136-40 dated 13-06-2022
6.	231800321	Iqrar Ullah	Saeed Ullah Bacha	15701-5395444-3	02-04-90	128.58	GHS Ganshall	INF(P) 2281/19	1442-49 date 13-05-2020	136-40 dated 13-06-2022
7.	231800160	Ashraf Ullah	Jehan Bahader	15702-7745827-9	20-03-91	128.57	GHSS Nehag	INF(P) 2281/19	1442-49 date 13-05-2020	136-40 dated 13-06-2022
8.	231800324	Sahibzada Saadat Ullah	Badshah Saeed	15701-5023460-9	25-01-90	127.49	GHS Sharmai	INF(P) 2281/19	1442-49 date 13-05-2020	136-40 dated 13-06-2022
9.	231800269	Muhammad Aslam	Sardar Alam	15701-3702830-9	06-03-93	127.44	GHSS Patrak	INF(P) 2281/19	1442-49 date 13-05-2020	136-40 dated 13-06-2022
10.	231800084	Meflah Uddin	Abdul Malik	15701-9264664-1	03-09-94	126.15	GHS Barikot	INF(P) 2281/19	1442-49 date 13-05-2020	136-40 dated 13-06-2022
11.	231800024	Muhammad Farooq	Habib Ur Rahman	15702-3418236-1	10-07-94	126.13	GHS Galkor	INF(P) 2281/19	1442-49 date 13-05-2020	136-40 dated 13-06-2022
12.	231800173	Syed Atif Shah	Syed Fazal Rauf Jan	15701-7638731-1	05-03-94	125.89	GHS Bin Bala	INF(P) 2281/19	1442-49 date 13-05-2020	136-40 dated 13-06-2022

2020 SST Maths/Physics

S. #	Roll #	Name Of SST	Father Name	CNIC	D.O.B	Total Marks	School	Adv.No and Date	Applt Order No and Date	Extension Order No and Date
1.	232100313	Fazal Hayat	Fazal Subhan	15701-0845304-5	05-04-95	132.41	GHS Bin Bala	INF(P) 2281/19	1442-49 date 13-05-2020	136-40 dated 13-06-2022
2.	232100277	Badshahud Din	Ghulam Rahim	15703-2370801-9	10-05-94	131.22	GHS Doong (P)	INF(P) 2281/19	1442-49 date 13-05-2020	136-40 dated 13-06-2022
3.	232100077	Badshah Ud Din	Aynud Din	15701-4417497-7	15-01-91	130.72	GHS Mattar	INF(P) 2281/19	1442-49 date 13-05-2020	136-40 dated 13-06-2022
4.	232100534	Muhammad Idrees	Hazrat Ali	15702-5723444-7	05-04-94	129.38	GHS Jelar	INF(P) 2281/19	1442-49 date 13-05-2020	136-40 dated 13-06-2022

44

32

Regularization of Adhoc SST of District Dir Upper (Male) 2022

5.	162100 229	Nasrullah Khan	Abdul Rehman	15701- 1185625-7	02-03-97	128.98	GHSS Patrak	INF(P) 2281/19	1442-49 date 13- 05-2020	136-40 dated 13- 06-2022
6.	232100 267	Sana Ullah	Naik Muhammad	15701- 5381493-9	02-08-91	127.59	GHS Shahikot	INF(P) 2281/19	1442-49 date 13- 05-2020	136-40 dated 13- 06-2022
7.	232100 244	Israr Ud Din	Amir Muhammad	15701- 2075606-5	15-05-93	127.44	GHS Doon Bala	INF(P) 2281/19	1442-49 date 13- 05-2020	136-40 dated 13- 06-2022
8.	232100 183	Suliman Shah	Nazar	15702- 7072292-9	18-05-93	126.84	GHS Jelar	INF(P) 2281/19	1442-49 date 13- 05-2020	136-40 dated 13- 06-2022
9.	232100 486	Shahid Ullah	Khan Sardar	15701- 1071076-3	13-03-95	126.71	GHS Baderkani	INF(P) 2281/19	1442-49 date 13- 05-2020	136-40 dated 13- 06-2022
10.	232100 173	Salman Khan	Inshad Ahmad	15701- 5770803-7	01-01-97	126.6	GHS Achar Bala	INF(P) 2281/19	1442-49 date 13- 05-2020	136-40 dated 13- 06-2022
11.	182100 669	Imran Zada	Habib Ur Rehman	15702- 8687213-3	15-07-82	124.35	GHS Galkor	INF(P) 2281/19	1442-49 date 13- 05-2020	136-40 dated 13- 06-2022

2020 SST IT

S. #	Roll #	Name Of SST	Father Name	CNIC	D.O.B	Total Marks	School	Adv:No and Date	Apptt Order No and Date	Extension Order No and Date
1.	232000 032	Ismail Khan	Ghafoor Ur Rahman	15701- 7389456-9	01-01-88	120.39	GHS Samkoot	INF(P) 2281 /19	1442-49 date 13- 05-2020	136-40 dated 13- 06-2022

2021 SST General

S. #	Roll #	Name Of SST	Father Name	CNIC	D.O.B	Total Marks	School	Adv:No and Date	Apptt Order No and Date	Extension Order No and Date
1.	205002 59	Fahad Ullah	Bahrul Haq	15701- 0537869-1	02-01-91	148.76	GHSS Swani	INF(P)40 19/20	4636-42 Dated 16-04- 2021	7686-90 dated 05- 10-22
2.	354047 99	Ijaz Ul Haq	Ghulam Rasool	15703- 3331924-5	08-03-98	135.49	GHS Barikot	INF(P)40 19/20	4636-42 Dated 16-04- 2021	7686-90 dated 05- 10-22
3.	204011 43	Farman Ullah	Akhtar Gul	15703- 9219901-5	20-04-94	134	GHSS Beyar	INF(P)40 19/20	4636-42 Dated 16-04- 2021	7686-90 dated 05- 10-22

2021 SST Maths/Physics

S. #	Roll #	Name Of SST	Father Name	CNIC	D.O.B	Total Marks	School	Adv:No and Date	Apptt Order No and Date	Extension Order No and Date
------	--------	-------------	-------------	------	-------	-------------	--------	-----------------	-------------------------	-----------------------------

45

33

Regularization of Adhoc SST of District Dir Upper (Male) 2022

1.	202000 49	Muhammad Kamran Khan	Abdur Rab Khan	15701- 6800872-5	20-02-96	129.30	GHS Ganshall Bala	INF(P)40 19/20	4636-42 Dated 16-04- 2021	7686-90 dated 05- 10-22
2021 SST IT										
S. #	Roll #	Name Of SST	Father Name	CNIC	D.O.B	Total Marks	School	Adv:No and Date	Apptt Order No and Date	Extension Order No and Date
1.	203000 89	Muhammad Abbas Khan	Abdur Rab Khan	15701- 2490811-7	04-03-95	135.65	GHS Daskore	INF(P)40 19/20	4636-42 Dated 16-04- 2021	7686-90 dated 05- 10-22
2021 SST Bio/Chem										
1.	351000 412	Asif Ali	Sahib Zada	15701- 8919531-1	13-02-91	130.03	GHS Doag Payeen	INF(P) 6749/2017	Restoration Notification of Contract Issued vide No. SO (PE) /5-1/Gen- Misc/Appea ls/Speaking Orders/Mr. Asif Ali, SST/2021 Dated:29- 10-2021	786-92 dated 16-11- 21
2022 SST IT										
S. #	Roll #	Name Of SST	Father Name	CNIC	D.O.B	Total Marks	School	Adv:No and Date	Apptt Order No and Date	Extension Order No and Date
1.	223280	Muhammad Tuaib	Farid Khan	15703- 8615656-9	02-03-93	141.45	GHS Jelar	INF(P)60 79/21	1514-19 dated 20- 06-22	Nil

*N.A stands for Not Available

Terms and Conditions:-

- 1 Their services shall be governed by the Khyber Pakhtunkhwa Civil Servant Act, 1973, the Khyber Pakhtunkhwa (Appointment, Deputation, Posting and Transfer of Teachers, Lecturers, Instructor and Doctors) Regularity Act, 2011, and such rules and regulation as may be issued from time to time by Government.
- 2 Their services will be considered regular and they shall be eligible for pension/deduction of GP Fund in term of Khyber Pakhtunkhwa Civil Servant Act, 1973, as amended in 2013, however, the teachers appointed on or after 07/06/2022 shall be dealt with Section (2)(2) of the Khyber Pakhtunkhwa (Amendment) Act, 2022.
- 3 Their services are liable to termination on one-month notice from either side. In case of resignation without notice, their one month pay/allowances shall be forfeited to the Government.
- 4 They shall possess the same qualification and experience required for the subject post on regular basis as specified in Section (3) (a) of the Act.

ATTESTED
Scanned with CamScanner

40

34

Regularization of Adhoc SST of District Dir Upper (Male) 2022

- 5 Their regularization shall not affect the service promotion quota of all service cadres as specified in Section (3) (e) of the Act.
- 6 They shall be entitled for seniority and pay from the date of initial appointment on Adhoc/Contract basis as specified in Section (3) (d) of the Act.
- 7 They shall perform duty for at least three years from the date of taking over charge where they were appointed/posted initially.
- 8 The regularization shall not be in favor of those teachers who have not taken over charge, remained absent from duty and resigned from service.
- 9 The Teacher, Regularized through this notification, shall be confirmed after successful completion of In-service mandatory training as specified in their Service Rules notified vide notification No. SO (PL) 4-5/SSRC/Meeting/2012/Teaching Cadre/2017 dated 07/03/2018 within two consecutive attempts otherwise their appointment orders shall be considered as withdrawn/cancelled from the date of declaration of result of the second attempt made in the induction program.
- 10 DEOs are directed to check/verify the documents/ Extension Orders etc service of the regularized teachers once again with the criteria mentioned for regularization. If the teachers don't meet the criteria their service shall be considered as ceased.

(Hafiz Dr. Muhammad Ibrahim)

Director

Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

41690-96

Endst: No. _____ / File No./D-1/SST (M)/Regularization/2018-22/Dir Upper Dated Peshawar the 01 / 12 2022

Copy forwarded for information and necessary action to the: -

1. District Education Officer (M) Dir Upper.
2. District Accounts Officer Dir Upper.
3. Officials Concerned
4. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department
5. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar
6. M/File

Hafiz Dr. Muhammad Ibrahim
Assistant Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

B

ATTESTED

47

P-35

To,

The Director,
E&SED KP Peshawar

SUBJECT: APPEAL FOR CORRECTION IN REGULARIZATION ORDER

Respected Sir,

It is very humbly submitted that;

1. I was appointed as SST (Bio-Chem) BPS-16 vide Appointment Order Endst: No.583-89/File No. 1/SST/Adhoc/Apptt/2018 Dated Peshawar the 14-09-2018. (Annex-1) P# 1
2. Later on an unjustified, unlawful and discriminated Discontinuation Order Endst: No.222-30/File No.112/SST (M) Complaint Upper Dir Dated Peshawar the 08-03-2019 (amended on 14-03-2019) was issued. (Annex-2) P# 6
3. On my appeal, I was reinstated back into service by the appellate authority (the worthy Secretary E&SED KP) vide Reinstatement Order Notification No. SO (PE)/5-1/Gen-Misc/Appeals/Speaking Order/Mr. Asif Ali, SST/2021 Dated Peshawar the 29-10-2021. (Annex-3) P# 7
4. Now, I have been regularized vide Regularization Order Endst No. 4092-96/File No/D-1/SST (M)/Regularization/2018-22/Dir Upper Dated Peshawar the 01-12-2022, but instead of regularization from Date of Appointment, I have been regularized from Date of Reinstatement. (Annex-4) P# 15

My plea is:

- I. Whereas, I have performed duties from Date of Appointment till the Discontinuation Order and even after that, which can't be ignored as per rules.
- II. And whereas, it is obvious from civil service rules, official rules of business and clarified by many court decisions including the Honorable High Courts and Supreme Court of Pakistan's judgments; reinstatement/restoration means as it was, and the reinstated/restored civil servant will be treated and considered as he was never been removed from service and will be entitled to all the rights and benefits as he had as never been removed.
- III. The Intervening period has also been treated as extraordinary leave without pay for the purpose of regularization of service in the reinstatement order.

In view of the aforesaid communique, It is clear that regularization from Date of Appointment is my due right and regularization from Date of Reinstatement is either mistaken or misunderstood. It is therefore requested to you; that kindly make correction in my Regularization Order Endst No. 4092-96/File No/D-1/SST (M)/Regularization/2018-22/Dir Upper Dated Peshawar the 01-12-2022, and regularize my service from Date of Appointment (w.e.f 14-09-2018) (as per Annex-5) instead of date of reinstatement. I will be very thankful to you for this act of immense kindness. P# 17

Dated: 21-12-2022

Yours Obediently
Asif Ali, SST (Bio-Chem)
Dir Upper

[Signature]
21/12/2022

[Signature]

50
992
21-12-22

48

VAKALATNAMA

BEFORE THE Khyber Pakhtunkhwa Service
Tribunal, Peshawar

SCANNED
KPST
Peshawar

_____ OF 2023

Asif Ali

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Education Deptt.

(RESPONDENT)
(DEFENDANT)

I/We Asif Ali

Do hereby appoint and constitute **MIR ZAMAN SAFI, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated: _____/_____/2023

Asif Ali

CLIENT

Mir Zaman Safi

ACCEPTED

**MIR ZAMAN SAFI
ADVOCATE**

OFFICE:

Room No.6-E, 5th Floor,
Rahim Medical Centre, G.T Road,
Hashtnagri, Peshawar.
Mobile No.0333-9991564
0317-9743003

54

SCANNED
KPST
Peshawar

BEFORE THE HONORABLE KHYBER PAKHATUNKHWA SERVICE 5/10/23
TRIBUNAL PESHAWAR.

Service Appeal No: 907/2023

Asif Ali, SST (Bio/Chem) BPS-16, GHS Doag Payeen, Dir Upper..... Appellant.

VERSUS

Secretary Education & others..... Respondents

INDEX

S/#	Description of document	Annexure	Pages No.
1	Joint Para Wise Comments along with affidavit		1-4
2	Copy of the appointment order dated 14-09-2018	A	5-9
3	Copy of the Explanation dated 08-11-2018 & reply	B&C	10-11
4	Copy of the order dated 08-03-2019	D	12-13
5	Copy of the notification dated 29-10-2021 & order dated 06-11-2021	E&F	14-15
6	Copy of the notification dated 01-12-2022	G	16-18
10	Authority letter		19

[Signature]
Assistant Director (Lit: II)
E&SE Khyber Pakhtunkhwa,
Peshawar

55

1

**BEFORE THE HONORABLE KHYBER PAKHATUNKHWA SERVICE
TRIBUNAL PESHAWAR.**

Service Appeal No: 907/2023

**SCANNED
KPST
Peshawar**

5/10/23

Asif Ali, SST (Bio/Chem) BPS-16, GHS Doag Payeen, Dir Upper..... Appellant.

VERSUS

Secretary Education & others..... Respondents

PARAWISE COMMENTS FOR & ON BEHALF OF THE RESPONDENTS No: 1-3

Respectfully Sheweth :-

The Respondents submit as under: -

**Khyber Pakhtukhwa
Service Tribunal**

Diary No. 8132

Dated 05/10/23

Preliminary Objections

1. **That** the appellant has got no cause of action/locus standi.
2. **That** the instant Service Appeal is badly time-barred, & liable to be dismissed.
3. **That** the appellant is not an aggrieved person within the meaning of Section-4 of Khyber Pakhtunkhwa Service Tribunal Act-1974 read with Article 212 of the constitution of Islamic Republic of Pakistan 1973.
4. **That** the appellant has concealed material facts from this Honorable Tribunal in the instant service appeal.
5. **That** the instant service appeal is against the relevant provisions of law.
6. **That** the appellant has filed the instant appeal on mala-fide intentions just to put extra ordinary pressure on the Respondents for the grant of illegal & even unauthorized service benefits.
7. **That** the appellant has not come to this Honorable Tribunal with clean hands.
8. **That** the Notification dated 29-10-2021 is legally competent.
9. **That** the impugned Notifications/orders dated 01-10-2022 & 16-11-2021 are also legal & liable to be maintained.
10. **That** the appellant is not entitled for regularization as SST (Bio/Chem) in BPS-16 w.e.f 14-09-2018 under the rules in vogue.
11. **That** the appellant is not entitled for re-instatement as SST w.e.f 08-03-2019.

ON FACTS.


- 1 **That** Para-1 is correct to the extent of induction of the appellant as SST (Bio/Chem) in BPS-16 vide order dated 14-09-2018 along with his adjustment as SST at GHS Chokiatan Dir (Upper) **attached as Annex-A.**
- 2 **That** Para-2 is incorrect as the appellant has been found guilty of willful absence from duty as SST in the said school, hence, the plea regarding his illness & filing of application for the grant of leave as an adhoc/contract employee is based on mala-fide just for gaining illegal service benefits from the Department as evident from the attendance register of the said school.
- 3 **That** Para-3 is also incorrect as the appellant is a habitual duty absconder in the Department, hence, his stand regarding bed rest on the advice of Doctor is also based on mala-fide.
- 4 **That** Para-4 is correct that vide order dated 08-11-2018, the Respondent No. 3 has sought an explanation from the appellant regarding his absence from duty without leave sanction order of the competent authority which was replied by the appellant **attached as Annex-B & C.**
- 5 **That** Para-5 is also incorrect as no such application for the grant of Extra Ordinary leave has been filed by the appellant till date as explained in the forgoing paras.
- 6 **That** Para-6 is incorrect as the appellant did not report for duty nor performed his duty in the said school as no duty certificate/attendance register is available on file in support of the plea of the appellant. Therefore, the appointment order dated 14-09-2018 was re-called vide order dated 08-03-2019 under the rules in vogue **attached as D.**
- 7 **That** para-7 is correct that the Departmental appeal has allowed vide order dated 29-10-2021 partially by re-instating the appellant in services as SST with immediate effect under the relevant provision of APT Rules 1989, whereby, the appellant has been restored as SST w.e.f 06-11-2021 **attached as E & F.**
- 8 **That** para 8 is correct to the extent of the order dated 01-12-2022, whereby, the appellant has regularized as SST (Bio/Chem) in BPS-16 w.e.f 16-11-2021 under the Rules & in view of his absence from duty, therefore, not entitled for regularization as SST w.e.f 14-09-2018 **attached as Annex-G.**
- 9 That para-9 is also incorrect as no Departmental appeal has been filed by the appellant against the Notification dated 01-12-2022, hence, got finality, hence, the appeal in hand is liable to be dismissed on the following grounds inter alia: -

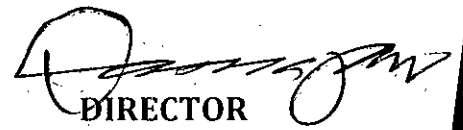
GROUNDS.

- A. **Incorrect & not admitted.** The act of the Department with regard to the order dated 01-12-2022 is legal.
- B. **Incorrect & not admitted,** the appellant has been treated as per Law & Rules in vogue by the Department in accordance with the provisions of Articles-04 & 05 of the constitution of 1973.
- C. **Incorrect & not admitted.** The orders/Notifications dated 29-10-2021, 06-11-2021 & 01-12-2022 are legally competent, hence, the plea of the appellant is illegal .
- D. **Incorrect & not admitted.** The plea of the appellant is against the actual facts & record he has been found guilty of willful absence from duty against SST (Bio/Chem) post by the authority.
- E. **Incorrect & not admitted** the stand of the appellant is illegal & liable to be rejected..
- F. **Incorrect & not admitted** the act of the Department is legal with regard to the order dated 16-11-2022.
- G. **Incorrect & not admitted** detailed reply has already been given by the Department in the above paras of the instant reply.
- H. **Incorrect & not admitted.** The appellant has got no cause of action to file the titled appeal under section-4 of Khyber Pakhtunkhwa Service Tribunal Peshawar Act-1974, therefore the Respondents also seek leave of this Honorable bench to submit additional grounds, case law & record on the date of hearing please.

Therefore, it is most humbly requested that the appeal is may kindly be dismissed in favor of the Respondent Department in the interest of justice.

Dated ___/___/2023.


SECRETARY
 E&SE Department Khyber
 Pakhtunkhwa, Peshawar.
 (Respondent No: 1)


DIRECTOR
 E&SE Department Khyber
 Pakhtunkhwa, Peshawar.
 (Respondents No: 2 & 3)

58

4

BEFORE THE HONORABLE KHYBER PAKHATUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No: 907/2023

Asif Ali, SST (Bio/Chem) BPS-16, GHS Doag Payeen, Dir Upper..... Appellant.

VERSUS

Secretary Education & others..... Respondents

AFFIDAVIT

I, Dr. Hayat Khan Assistant Director (Litigation-II) E&SE Department Khyber Pakhtunkhwa, do hereby solemnly affirm & declare on oath that the contents of the instant para wise Comments are true & correct to the best of my knowledge & belief. It is further stated on oath that in this appeal the answering Respondents have neither been placed Ex-Parte nor their defense has been struck off/cost.

Deponent

ATTESTED



59

5

A - 56

Dir Upper Male Appointment Order SST Adhoc

**Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar**



APPOINTMENT.

Consequent upon recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the post of Secondary School Teacher (SST Bio Chem), (SST Maths Phy), (SST General) School based in BPS-16 (Rs. 15880-1280-54280) @ Rs. 15880/- 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 with effect from the date of their taking over charge:-

(SST Bio Chem)

Sr#	RollNo	Name	NICH	Address	Academic Marks	NTS Marks	Total Marks	School Name
1	291002894	SALIM SAIF ULLAH	16102-9668224-1	ROOM NO 2 IMG HOSTEL PAK METERO LOGICAL DEPT UNIVERSITY ROAD KARACHI	72.92	67	139.92	GHSS Akhgram
2	351000391	MURAD KHAN	15701-9589501-1	MOHALLAH GIRLS HIGH SCHOOL BULIGAR TEH DIR DISTT DIR UPPER	67.98	64	131.98	GHS Dabando
3	351000412	ASIF ALI	15701-8919531-1	VILL SHAMORGRA PO BIBYAWAR TEH DIR DISTT DIR UPPER	65.30	65	130.3	GHS Chukiatan
4	351000213	IFTIKHAR ANJUM	15701-1716301-9	VILL KATAN PAYEN CHUMRA P DARORA DIST AND TEHSIL AND UPPER DIR	67.72	62	129.72	GHSS Gandigar
5	351000158	IBAD UR RAHMAN	15701-9775558-3	HASAN DRUG HOUSE NEAR DHQ HOSPITAL MAIN BAZAR DIR UPPER	64.68	65	129.68	GHS Surobat
6	351000113	IQRAR ULLAH	15701-5395444-3	VILLAGE KALU BMANDI PO JABAR TEHSL DIR DSIRICT UPPERDIR	74.55	55	129.55	GHS Samkoot
7	351000367	FAYAZ KHAN	15701-0801476-1	VILLAGE AND P/O ALMAS TEHSIL AND DISTR UPPER DIR	61.64	67	128.64	GHS Alligasar
8	351000382	ASHFAQ AHMAD	15702-1463631-7	VILLAGE CANKASS TEH AND POST OFFICE WARI DISTT UPPER DIR	72.05	56	128.05	GHS Shang
9	351000290	WAHEED ARSHAD	15702-8282832-1	VILLAGE WARI TEH PO WARI	65.47	62	127.47	GHS Bibywar
10	241000694	INAM UL HAQ	15702-8356963-3	VILLAGE GURRAI TEHSIL AND POST OFFICE WARI DIR LOWER	73.29	52	125.29	GHS Bandi (P)
11	271001274	TAHIR REHMAN	16101-9952274-3	VILL BAGH E HARAM PO ALO TEHSIL KATLANG DISTT MARDAN	65.23	60	125.23	GHSS Patrak
12	271001705	SHAKEEL AHMAD KHAN	15701-4859129-7	MOHALLAH BAZAR CHUM VILL DARORA DIST UPPER DIR	62.03	62	124.03	GHS Jelar
13	351000319	RIAZ KHAN	15702-6442308-3	VILL TANGI PO WARI DISTT UPPER DIR	61.57	58	122.57	GHS Molvi
14	351000261	TAHIR ULLAH	15701-5864716-7	VILL AND PO BIBYAWAR DIST UPPER DIR KPK	63.17	59	122.17	GHS Kalr Dara
15	241000843	INAYAT ULLAH HAQ	15702-8162310-5	VILL GURRAI WARI P O WARI DIR U DIR	64.11	58	122.11	GHS Shinkari
16	291001662	MUDASSIR ALAM	15702-1074118-7	NAVEED MEDICOSE WARI UPPER DIR	69.09	52	121.09	GHSS Sharlingal
17	351000501	NISAR AHMAD	15701-8183885-3	VILLAGE CHERAGULI PAYEEN P O BIBYAWAR DIST AND TEH DIR UPPER	56.64	54	120.64	GHSS Sawni
18	351000459	GHULASM ISHAQ	15702-3342174-5	VILLAGE AND PO AKHAGRAM TEHSIL WARI DIR UPPER	60.89	58	118.89	GHS Bela

Attested
P.

M. B.

60

6

Dir Upper Male Appointment Order SST Adhoc?

Sr#	RollNo	Name	NICH	Address	Academic Marks	NTS Marks	Total Marks	School Name
19	281000533	MUHAMMAD AYAZ	15701-8462314-9	HOUSE NO 60 ARMOUR COLONY NO 2 HAKIMABAD NOWSHERA CANTT	64.61	54	118.61	GHSS Kalkot
20	351000155	SHAHZAD ZAKI	15704-5424207-1	VILLAGE PO AND TEH BRAWAL BANDI DIS DIR LOWER	57.31	61	118.31	GHS Shingara
21	351000406	FARMAN ALI	15701-8484005-3	PO DIR URBAN QUADI E AZAM MODEL SCHOD DIR UPPER	60.05	58	118.05	GHS Rokhan
22	351000337	ZIA UD DIN	15701-8340369-1	VILLAGE DOAG PAYEEN POST OFFICE SHIERNGAL DISTRICT DIR UPPER	63.22	54	117.22	GHS Baderkanl
23	271002288	IBRAHIM KHAN	15701-2957084-7	VILL SHAHOOR PAYEEN POST OFFICE TEH SHERINGAL DISTT UPPER DIR KP	70.43	46	116.43	GHS Hayagl Sherqi
24	291001911	MUHAMMAD ISMAIL	15702-8159898-9	UMAR PHARMACY NEAR FRONTIER WOMEN UNIVERSITY QILLA BALA HESAR LRH	58.19	58	116.19	GHS Thall
25	351000486	FAZAL MANAN	15704-4275708-7	VILL BIN PAYEEN PO TEHSIL BARAWAL BANDI DIST DIR UPPER	63.79	52	115.79	GHS Janbhatti

(SST Maths Phy)

Sr#	RollNo	Name	NICH	Address	Academic Marks	NTS Marks	Total Marks	School Name
1	352000212	NAGIB ULLAH	15701-9082466-7	VILLAGE AND PO HAYASERI TEH BALAMBAT	66.16	72	138.16	GHSS Sheringal
2	352000370	IRFAN UDDIN	15701-0792596-9	VILLAGE AND PO BIBYAWAR DISTT UPPER DIR	58.99	72	130.99	GHSS Usheral
3	352000392	MUJAHID KHAN	15702-5286812-9	C/O IJAZ HARDWAR CHAPPAR CHAK PO WARI TEH WARI	60.69	66	126.69	GHS Ossori
4	352000337	NISAR UL HAQ	15702-3835780-1	ROOM 63 RAHMAN BABA HOSTEL 2 UNIVERSITY OF EPSHAWAR	64.38	62	126.38	GHS Nagril
5	352000222	NISAR MUHAMMAD	15701-7886983-5	VILLAGE DARIKAND TEHSIL AND P.O BARAWAL BANDI DISTT	62.63	62	124.63	GHSS Patrak
6	352000045	ZAHEER ABBAS	15701-5947232-9	VILLAGE MASHANGO KASS TEH AND P/O BARAWALA BANDI DISTT DIR UPPER	64.96	59	123.96	GHS Shingara
7	352000338	SAJJAD AHMAD	15702-9485752-1	VILLAGE UMRALI PAYEN TEHSIL WAR UPER	65.79	58	123.79	GHS Jughabanj
8	292001775	SHAH ZAIR KHAN	15702-8773296-9	DIR MEDICOS TOWN RING ROAD YOUSAFABAD PESHAWAR	64.52	59	123.52	GHS Birari
9	352000205	SHAKEEL AHMAD	15701-6847611-9	VILL AND POIST BIBYAWAR DISTT	62.68	60	122.68	GHSS Sawnl
10	352000138	SAJJAD KHAN	15701-3926542-1	ROOM NO 63 RAHMAN BABA HOSTEL 2 UNIVERISTY OF PESHAWAR	64.45	57	121.45	GHSS Qulandi
11	352000385	AMBAR KHAN	15703-2634511-7	VILL PO PATRAK TEH KALKOT DSIT DIR UPPER	64.24	55	119.24	GHS Barikot
12	352000281	ABID AYUB	15701-1857869-7	VILLAGE AND PO BOX BIBYAWAR DIR LOWER	66.08	53	119.08	GHS Bibyawar
13	242000416	MUHAMMAD IBRAHIM	15702-3722836-3	VILLAGE AND PO AKHAG RAM TEHSIL WARI DIR UPPER	61.67	57	118.67	GHSS Patrak
14	242000042	AYAZ ULLAH	15702-7382094-3	VILAGE AND P/O SHAIBABAD TEH WARI DIT DIR UPPER	60.13	58	118.13	GHSS Gandigar
15	292000635	SAIFUR RAHMAN	15702-5995410-5	VILLAGE UMRALI PO TEHSIL WARI DISTT UPPER DIR	58.45	59	117.45	GHS Daskor

Attached

TEST

(57)

(7)

Dir Upper Male Appointment Order SST Adhoc3

Sr#	RollNo	Name	NIC#	Address	Acade mic Marks	NTS Marks	Total Marks	School Name
16	352000223	RASHID KHAN	15701-9800305-3	VILL PANAKOT PO QULANDI DISTT DIR TEH DIR UPPER	65.80	51	116.8	GHS Rokhan
17	292001948	SHAHID ALI SHAH	15704-8450459-1	ALLAMA IQBAL HOSTEL NO 9 ROOM 88 UNIVERSITY OF PESHAWAR	57.69	59	116.69	GHS Pachakalay
18	352000232	ABDUL WADUD	15701-1268634-3	MOHALLHA QALA CHUKYATAN TEHSIL DIR DIST UPPER DIR	63.61	53	116.61	GHS Dobando
19	352000214	MUHAMMAD AYAZ	15702-9316795-5	VILLAGE UMAROT PO TEHSIL WARI DSIT DIR UPPER	60.33	56	116.33	GHS Sharingal
20	292001147	MUHAMMAD YASEEN	17301-9619046-3	P/O CITY RAILWAY STATION H 137 ST 3 MOH KHALID BIN WALID COLONY RING ROAD PESHAWAR	61.10	55	116.1	GHS Molvi
21	292001957	MUHAMMAD IMRAN	15702-5055248-9	HO NO 1575 ST 39 SECTOR 1/10/2 ISLAMABAD	57.46	58	115.46	GHS S5 Khel
22	352000260	ASIF ANWAR	15702-5626900-7	VILLAGE KAKAD BANDA PO AND TEHSIL WARI DIR UPPER	63.38	52	115.38	GHS Darora
23	352000180	NAVEED ULLAH	15701-5778271-1	VILL REHANKOT PAYEEN PO DIR UPPER DISTT AND TEH DIR UPPER	65.95	49	114.95	GCMHSS Dir
24	352000168	ABDUL WARIS	15701-8362507-7	VILL SURBAT PAYEEN PO GAND RI DISTT AND TEH DIR U	58.82	56	114.82	GCMHSS Dir
25	352000124	HAZ AHMAD	15702-3747539-5	VILG CHAPPER TEH AND P/O WARI DIST UPPER DIR	54.93	59	113.93	GHS Nehag
26	212000079	SAMI UR RAHMAN	15704-5010803-3	VILLAGE AND P O BARAWAL BANDI	65.91	48	113.91	GHS Surbat
27	152000143	RASOOL KHAN	15703-0610687-7	CO MASOOD JAN QARI NEAR MIDDLE SCHOOL MAHMOOD ABAD UMRZAI	56.77	57	113.77	GHS Beyar
28	352000143	JAN ZADA	15702-5393505-5	VILLAGE KOORBATAN P O AND TEH WARI	55.72	58	113.72	GHS Katan (B)
29	352000044	KHIZAR HAYAT	15701-2061598-3	SAMIULHAQ GO EMIS BRANCH DIST EDUCATION OFFICE DIR U	57.68	56	113.68	GHS Samkoot
30	292000568	KURSHID ALAM	15703-1833621-5	P O NAHAQI CHARSA DA ROAD SHAH ALAM PUU GULSHAN MADINA COLONY PEHSAWAR	66.36	47	113.36	GHS Kalkot
31	272000987	ATTA ULLAH	17101-4010571-7	VILL SHEIKHAN P/O DASEHRA DISTT AND TEHSIL CHARSA DA	57.02	56	113.02	GHS Thall
32	352000331	NAEEM ZADA	15702-8674333-3	VILLAGE GOGYAL TEHSIL WARI DISTRICT UPPER DIR	56.45	55	111.45	GHS Allgasar

(SST General)

Sr#	RollNo	Name	NIC	Address	Acade mic Marks	NTS Marks	Total Marks	School Name
1	293003459	AMJAD ALI	17301-3757870-3	SABEEN TRAVELS DIR MADEL TOWER BARMAT OFFCE NO 01 LR ROAD PESH	67.82	82	149.82	GHS Samkoot
2	354000494	WIQAS AHMED	15701-5492907-7	VILL KASS TEHSEEL AND DIS DIR UPPER C O ARSHAD ALI KPO DEPUTY COMMISSIONER OFFICER	68.73	78	147.73	GHS Rokhan
3	354000501	ZIA UR RAHMAN	15701-2860182-9	SAEED MEDICIPOS NEAR DISTT HEAD QUARTER DHQ HOSPITAL DIR TEH DIR DISTT DIR UPPE	70.52	77	147.52	GHS Sharmal

(62)

8



Dir Upper Male Appointment Order SST Adhoc

Sr#	RollNo	Name	NIC	Address	Acade mic Marks	NTS Marks	Total Marks	School Name
4	354000792	SAJAD ULLAH	15701-8908647-5	MATAKA COLEGE COLONY UPPER DIR	71.84	74	145.84	GHS Sharmal
5	354000404	KHURSHID ALI	15701-8388840-1	SHALIMAR PRINTING PRESS DIR TOWN TEHSIL DIR DIST UPPER DIR	63.53	80	143.53	GMS Doon Serai
6	293001816	HAFIZ UDDIN	15704-7615049-9	MAIN KOHATI GATE WAZIR BAGAH ROAD ZEB MEDICOSE PESHAWAR	69.73	71	140.73	GHSS Patrak
7	243000564	SAIF ULLAH	15702-4014111-3	VILLAGE MAJAL TEHSIL WARI DISTRICT DIR UPPER POST OFFICE SHINKAIRARI KORI	72.64	67	139.64	GMS Bandi Bala
8	354000803	USMAN GHANI	15701-8989965-1	USMAN SANATIORY STORE NEAR TELENOR FRANCHISE CHITRAL ROAD DIR	70.01	69	139.01	GHS Hayagi Sherqi
9	243001149	SANA ULLAH	15701-8290577-5	ZAIB HOUSE MOHALALH ZAIBABAD P O CHAKDARA TEH ADENZAI DIR LOWER	64.79	73	137.79	GHSS Usheral
10	354000486	AMJAD MAAZ	15701-4355311-5	VILLAGE SERI PO BIBYAMAR DIST AND TEHSIL DIR UPPER	65.76	72	137.76	GHS Molvi
11	354000685	IFTIKHAR KHAN	15701-7426210-9	VILLAGE AND POST OFFICE QULANDI TEH AND DST UPPER DIR	60.54	77	137.54	GHS Malangz
12	293003811	SADDAM HUSSAIN	15702-6616572-1	VILLAGE KAKAD THE AND P/O WARI DIST UPPER DIR	62.41	75	137.41	GHS Bandi (P)
13	353000558	AMJAD KHAN	15701-9466541-5	MOHALLAH JABBA VILLAGE AND P/O DARORA TEHH NAD DIT DIT UPEPR	66.79	70	136.79	GHS Samkoot
14	354000790	ABAID ULLAH	35201-4508761-3	HOSUE NO 189 LDA USMANABAD MUGHALPURA LHORE	54.42	82	136.42	GMS Gurril
15	353000349	ROOHUL AMIN	15701-1843337-5	PO JABAR VILL ALMAS TEH DIR DIST UPPER	67.08	69	136.08	GHS Allgasar
16	353000360	FAZLI REHMAN	15702-5911683-3	THE CRESENT MODEL SCHOOL WARI DIST UPPER DIR	67.98	68	135.98	GHS Bandi (P)
17	354000374	ABDUL QAYUM	15701-5017034-7	VILL GLAKOR P/O TARPATAR DIST DIR UPPER	70.88	65	135.88	GMS Jarjuri
18	354000122	NIAZU DDIN	17102-8156674-1	PETAW KATIR P O SHERIGNAL TEHSIL SHERINGAL DISTRICT DIR UPPER	54.36	81	135.36	GHS Miana Doag
19	354000201	HANIF ULLAH	15702-5297251-3	VILLAGE UMARKOT TEHSIL AND PO WARI UPPER DIR	50.87	84	134.87	GHSS Beyar

TERMS & CONDITIONS.

1. NO TA/DA etc is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. Appointment is purely on temporary & contract basis initially for one year wef 20th September, 2018 to 19th September, 2019.
4. He should not be handed over charge if he exceeds 35 years or below 19 years of age. Age relaxation case may be submitted to competent authority.
5. If any candidate is over age less than two years, their upper age limit less than two years is hereby relaxed.
6. If any maritorious candidate is deprived from appointment by this order and the competent authority accepted his appeal, the appointment order of the low merit candidate will be withdrawn and adjustment order will be reviewed according to merit.
7. Appointment is subject to the condition that the certificate/documents must be verified from the concerned authorities by the DEO (concerned), any one found producing bogus Certificate will be reported to the law enforcing agencies for further action.
8. His services are liable to termination on one month's notice from either side. In case of resignation without notice his one-month pay/allowances shall be forfeited to the Government.

Attested
P

WSP

ATTES

(63)

9

Dir Upper Male Appointment Order SST Adhoc

9. Pay will not be drawn until and unless a certificate to the effect by DEO(concerned) is issued that his certificates are verified
10. He should join his post within 15 days of the issuance of this notification. In case of failure to join the post within 15 days of the issuance of this notification, his appointment will expire automatically and no subsequent appeal etc shall be entertained.
11. The candidate concerned should produce Health & Age certificate duly signed by Medical Superintendent concerned before taking over charge.
12. He will be governed by the rules and regulations in the field and as may be issued from time to time by the Govt.
13. His contract shall be discontinued at any time, in case his performance is found unsatisfactory.
14. His appointment is made on School based, He will have to serve at the place of posting, and His service is not transferable to any other station.
15. Before handing over charge once again their document may be checked if they have not the required relevant qualifications as per rules, they may not be handed over charge of the post.

(Farid Ahmad Khattak)

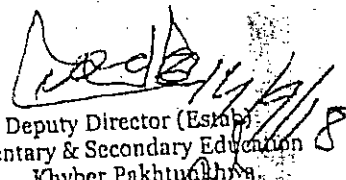
Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar


Endst: No. 583-89 / File No.1/ /SST/Adhoc/Appt:/2018 Dated Peshawar the 14 /09/2018.

Copy forwarded for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Secretary Khyber Pakhtunkhwa Public Service Commission Peshawar.
3. District Education Officer (Male) concerned.
4. District Accounts Officer Concerned
5. Official Concerned.
6. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
7. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
8. M/File.

Attested
R


Deputy Director (E&SE)
Elementary & Secondary Education
Khyber Pakhtunkhwa


ATTESTED



OFFICE OF THE
 DISTRICT EDUCATION OFFICER MALE D'R UPPER
 PH. NO. 0944-887450 FAX 0944-880411 Email emdir_upper@gmail.com

No. 8721 P.No. 36 DEO (M. Dir) / SEB Dated Dir (M) on 8/11 / 2018

Mr. Asif A.T.
 SST Bio. Chem.
 GHS Chudiyatan (U) Upper.

Subject: EXPLANATION.

Memo:

As per report of the Headmaster GHS Chudiyatan (U) Upper that you remained from school duties on 24-10-2018 without sanction of leave. You are hereby directed to bring to the notice of your duty station otherwise strict disciplinary action will be taken against you under section 3(d) of the Rajasthan Government Service (Efficiency and Discipline) Rules, 2017.

You are hereby directed to explain your position for such absence. Your reply/ explanation should reach to the office signed within the 7 days positively.

DISTRICT EDUCATION OFFICER,
 MALE D'R UPPER.

No. 8722-6 P.No. 36 DEO (M. Dir) / SEB Dated Dir (M) on 8/11 / 2018

- 1. To be read by the recipient of the memo.
- 2. To be read by the recipient of the memo.
- 3. To be read by the recipient of the memo.
- 4. To be read by the recipient of the memo.
- 5. To be read by the recipient of the memo.

DISTRICT EDUCATION OFFICER,
 MALE D'R UPPER.

(11)

(H-13)

The District Education Officer
Dir Upper

SUBJECT: EXPLANATION

Respected sir,

In reply to the explanation orders received from your good office vide No.8701/F.No.36/DEO (M) Dir (U)/SEB; dated 8/11/2018, regarding my nonappearance to the school duties without sanctioned leave. With due respect it is submitted that:

1. I have not been absent from duties for the period as reported by the school in-charge. In fact, I was absent on 24/10/2018 due to illness. The second day I submitted application to the school in-charge through my younger brother stating therein that I am proceeding to Peshawar for treatment but the same was returned with the remarks from the school in-charge that District Monitoring Officer's staff has already marked him absent in attendance Register and the application couldn't be entertained (Annex-A).
2. On 26-29/10/2018, I was on the way to Peshawar and then in the hospital for treatment.
3. On 29/10/2018, I was examined by the doctor and advised to revert to my address (Annex-B).
4. On returning from the hospital, I submitted my explanation to the school in-charge and forwarded the same to your good office and your good office sanctioned my leave with 29-10-2018 to 4-11-2018 (Annex-C).

In the circumstances explained above, it is requested that on receipt thereof reference to the explanation, kindly be generated from the charge of absence from school duties reported by the School in-charge and awarded with forgiveness. My family members are

Thanking you.

Yours obediently,

103001
20/11/18

11/11/18

11/11/18
13/11/18

11/11/18

ASST. DIR,
SST (Bio-Chemistry)
GIS, Chakdara, Dir(U)

11/11/18
13/11/18
11/11/18
13/11/18

CS

12

Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

208
208

OFFICE ORDER.

The contract in respect of Mr. Asif Ali SST (Bio/Chem) GHS. Chokyatin District Dir Upper is hereby discontinued with effect from 20-11-2017 w.e.f. 24-10-2018 as reported by the District Education Officer (Male) Mardan vide No. 1131-32 dated 22-12-2018.

Director

2224-30

Endst: No. _____ / File No. 112/SST (M) Complaint Dir Upper
Dated Peshawar 21/3 /2019

Copy forwarded for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa, Peshawar.
2. District Education Officer (Male) Dir Upper.
3. District Accounts Officer Dir Upper.
4. Principal GHS Chokyatin District Dir Upper.
5. Official concerned.
6. PS to Secretary to Govt. of Khyber Pakhtunkhwa, E&SE Department, Peshawar.
7. PA to Director Local Directorate.
8. Master File.

Attested ADD (Secy.)
do as directed
R

[Signature]
Dy: Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

16/3
234
16/3/19

[Signature]
17/3/19



68

14

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Dated Peshawar the 29-10-2021

NOTIFICATION

No.SO(PE)/5-1/Gen-Misc/Appeals/Speaking Order/Mr.Asif Ali, SST/2021: -

1. WHEREAS, Mr. Asif Ali ex-SST (Bio/Chem) BPS-16 has submitted an appeal to the appellate authority for re-instatement into service.

2. AND WHEREAS, while posted at GHS Chukiatan, Dir Upper the appellant had applied for grant of leave on Medical Grounds as advised by the Doctors. However, DEO (M) Upper Dir initiated disciplinary action against the appellant and recommended withdrawal of his contractual appointment to the Directorate E&SE.

3. AND WHEREAS, on the recommendation of the DEO (M) Dir Upper, the Directorate of E&SE, Khyber Pakhtunkhwa had discontinued contractual appointment of the appellant vide office order No. 2224/30/F.No.112/SST(M)Complaint Dir Upper, dated 08.03.2019.

4. AND WHEREAS, the appellant was provided with an opportunity of personal hearing through Mr. Rahmat Ali Wazir, Deputy Secretary (Assembly Business), E&SE Department, Khyber Pakhtunkhwa on 22.06.2021.

5. AND WHEREAS, the appellate authority, after examination of record and pros and cons of the case, has found that the appellant has been discriminated with regard to his request for leave on medical grounds.

6. NOW, THEREFORE, in exercise of the powers conferred under rule 17 (2)(b) of Efficiency & Discipline Rules, 2011, the appellate authority (Secretary E&SE) has been pleased to restore the contractual appointment of Mr. Asif Ali as SST (Bio/Chem) (BPS-16) in E&SE Department District Dir Upper with immediate effect. The intervening period w.e.f 08.03.2019 is hereby treated as leave without pay as provided under FR-54 (b).

Attested
P

SECRETARY
ELEMENTARY & SECONDARY EDUCATION

Endst: No & date even:

Copy forwarded to:

1. The Director, Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar.
2. The District Education Officer (M) Dir Upper.
3. The District Accounts Officer, Dir Upper
4. The PS to Secretary, E&SED Khyber Pakhtunkhwa.
5. The PA to Additional Secretary (Estab), E&SED, Khyber Pakhtunkhwa.
6. The PA to Additional Secretary (General), E&SED, Khyber Pakhtunkhwa.
7. The PA to Deputy Secretary (A B), E&SED, Khyber Pakhtunkhwa.
8. Mr. Asif Ali, SST (BC) BPS-16, Chukiatan, District Dir Upper.

AD BOS
keep on 11/10/21 for le
2) [Signature]

[Signature]
(Mian Hussain Din)
SECTION OFFICER (PE)
29-10-2021

(69)

(15)

M. (Signature)



**GOVERNMENT OF KHYBER PAKHTUNKHWA
OFFICE OF THE DISTRICT EDUCATION OFFICER
MALE DIR UPPER**



PH No 0944-881400 E-mail: deomdirupper@gmail.com

OFFICE ORDER:

In acceptance of appeal by worthy secretary E&SE Govt: of Khyber Pakhtunkhwa vide No. SO (PR)/5-1/Gen-Misc/Appeals/Speaking order/ Mr. Asif Ali SST/dated 29-10-2021, The contractual appointment of Mr. Asif Ali SST (Blo: Chem:) has been restored by Secretary Elementary & Secondary Education Khyber Pakhtunkhwa, adjusted at Govt: High School Doag Payeen Dir Upper against vacant SST (Blo: Chemistry) post w.e.f 01-11-2021, the entire period w.e.f 08-03-2019 to 31-08-2021 has been converted into leave without pay in the light of above afore mentioned notification.

Note:-

- 01- Charge report should be submitted to all concerned.
- 02- No TA/DA is allowed.

(MUHAMMAD ASHRAF)
DISTRICT EDUCATION OFFICER
(MALE) DIR UPPER.

Endst No. 4103-4106 /F.No.15/DEO (M)/Estb (S) Dated: 06/11 /2021.
Copy forwarded for information to the:-


- 03- Director of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- 04- District Accounts Officer Dir Upper.
- 05- Principal/Head Master/In-charge concerned.
- 06- Teachers concerned.

Attested (Signature)

ATTESTED (Stamp)

(Signature)
DISTRICT EDUCATION OFFICER
(MALE) DIR UPPER.

(70)

0 - 
16



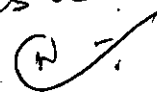
Regularization of Adhoc SST of District Dir Upper (Male) 2022

Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

Notification

Under the provision of the Khyber Pakhtunkhwa Teachers (Appointment and Regularization of Services) Act, 2022 (Khyber Pakhtunkhwa Act No.XLI of 2022), the services of the following Secondary School Teachers Male (SST Bio/Chem BPS-16, SST Maths/Phy BPS-16, SST General BPS-16 and SST IT BPS-16 appointed on Adhoc/Contract basis w.e.f 08/03/2017, are hereby regularized in Teaching Cadre on the terms and conditions given below with effect from the date of their initial appointment till the commencement of the Act ibid:

2018 SST General										
S. #	Roll #	Name Of SST	Father Name	CNIC	D.O.B	Total Marks	School	Adv.No and Date	Apntt Order No and Date	Extenslon Order No and Date
1.	354000 494	Wiqas Ahmed	Bakht Diland	15701- 5492907-7	10-04-91	147.73	GIIS Rokhan	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
2.	354000 792	Sajad Ullah	Ibadat Jan	15701- 8908647-5	15-03-92	145.84	GIIS Shamail	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
3.	354000 404	Khurshid Ali	Muhammad Rafiq	15701- 8388840-1	06-10-92	143.53	GMSJarjuri	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
4.	293001 816	Hafiz Uddin	Sangeen Khan	15701- 7615049-9	29-01-90	140.73	GHSS Patak	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
5.	243000 564	Saif Ullah	Gul Ruhim	15702- 4014111-3	01-02-89	139.64	GMSBandi Bala	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
6.	354000 803	Usman Ghani	Badshah Ud Din	15701- 8389965-1	18-03-90	139.01	GHS Hayagi- Sherqi	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
7.	354000 486	Amjad Manz	Muhammed Tahir	15701- 4355311-5	01-05-94	137.76	GHS Molvi	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
8.	354000 685	Inikhar Khan	Habib Ullah Khan	15701- 7426210-9	23-04-92	137.54	GHS Malanga	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
9.	293003 811	Saddam Hussain	Talib Jan	15702- 6616572-1	20-03-93	137.41	GHS Bandi (P)	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
10.	353000 558	Amjad Khan	Sham Sher Khan	15701- 9466541-5	16-05-89	136.79	GHS Samkoot	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
11.	354000 790	Abaid Ullah	Sharif Ullah	35201- 4308761-3	02-03-89	136.42	GMSGurrai	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
12.	353000 349	Roohul Amin	Abdul Sattar	15701- 1843337-5	10-09-92	136.08	GHS Samkoot	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21
13.	353000 360	Fazli Rehman	Malook Khan	15702- 5911683-3	20-01-87	135.98	GHS Bandi (P)	INF(P) 6749/2017	583-89 date 14- 09-2018	786-92 dated 16- 11-21

Attested


71

17

33

Regularization of Adhoc SST of District Dir Upper (Male) 2022

1.	202000 49	Muhammad Kamran Khan	Abdur Rab Khan	15701- 6800872-5	20-02-96	129.30	GHS Ganshall Bala	INF(P)40 19/20	4636-42 Dated 16-04- 2021	7686-90 dated 05- 10-22
----	--------------	----------------------------	-------------------	---------------------	----------	--------	-------------------------	-------------------	------------------------------------	-------------------------------

2021 SST IT

S. #	Roll #	Name Of SST	Father Name	CNIC	D.O.B	Total Marks	School	Adv.No and Date	Apptt Order No and Date	Extension Order No and Date
1.	203000 89	Muhammad Abbas Khan	Abdur Rab Khan	15701- 2490811-7	04-03-95	135.65	GIS Daskore	INF(P)40 19/20	4636-42 Dated 16-04- 2021	7686-90 dated 05- 10-22

2021 SST Bio/Chem

1.	351000 412	Asif Ali	Sahib Zada	15701- 8919531-1	13-02-91	130.03	GHS Doag Payeen	INF(P) 6749/2017	Restoration Notification of Contract Issued vide No. SO (PE) /5-1/Gen- Misc/Appea ls/Speaking Orders/Mr. Asif Ali, SST/2021 Dated:29- 10-2021	786-92 dated 16-11- 21
----	---------------	----------	------------	---------------------	----------	--------	--------------------	---------------------	---	---------------------------------

2022 SST IT

S. #	Roll #	Name Of SST	Father Name	CNIC	D.O.B	Total Marks	School	Adv.No and Date	Apptt Order No and Date	Extension Order No and Date
1.	223280	Muhammad Tuaib	Ferid Khan	15703- 8515656-9	02-03-93	141.45	GHS Jelar	INF(P)60 79/21	1514-19 dated 20- 06-22	Nil

*N.A stands for Not Available

Terms and Conditions:-

- 1 Their services shall be governed by the Khyber Pakhtunkhwa Civil Servant Act, 1973, the Khyber Pakhtunkhwa (Appointment, Deputation, Posting and Transfer of Teachers, Lecturers, Instructor and Doctors) Regularity Act, 2011, and such rules and regulation as may be issued from time to time by Government.
- 2 Their services will be considered regular and they shall be eligible for pension/deduction of GP Fund in term of Khyber Pakhtunkhwa Civil Servant Act, 1973, as amended in 2013, however, the teachers appointed on or after 07/06/2022 shall be dealt with Section (2)(2) of the Khyber Pakhtunkhwa (Amendment) Act, 2022.
- 3 Their services are liable to termination on one-month notice from either side. In case of resignation without notice, their one month pay/allowances shall be forfeited to the Government.
- 4 They shall possess the same qualification and experience required for the subject post on regular basis as specified in Section (3) (a) of the Act.

Attested
K

Attested
Scanned with CamScanner

72

18

34

Regularization of Adhoc SST of District Dir Upper (Male) 2022

- 5 Their regularization shall not affect the service promotion quota of all service cadres as specified in Section (3) (c) of the Act.
- 6 They shall be entitled for seniority and pay from the date of initial appointment on Adhoc/Contract basis as specified in Section (3) (d) of the Act.
- 7 They shall perform duty for at least three years from the date of taking over charge where they were appointed/posted initially.
- 8 The regularization shall not be in favor of those teachers who have not taken over charge, remained absent from duty and resigned from service.
- 9 The Teacher, Regularized through this notification, shall be confirmed after successful completion of In-service mandatory training as specified in their Service Rules notified vide notification No SO (PI) 4-5/SSRC/Meeting/2012/Teaching Cadre/2017 dated 07/03/2018 within two consecutive attempts otherwise their appointment orders shall be considered as withdrawn/cancelled from the date of declaration of result of the second attempt made in the induction program.
- 10 DEOs are directed to check/verify the documents/ Extension Orders etc service of the regularized teachers once again with the criteria mentioned for regularization. If the teachers don't meet the criteria their service shall be considered as ceased.

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

41692-96

Endst: No. _____ / File No./D-1/SST (M)/Regularization/2018-22/Dir Upper Dated Peshawar the 01/11/2022

Copy forwarded for information and necessary action to the: -

1. District Education Officer (M) Dir Upper.
2. District Accounts Officer Dir Upper.
3. Officials Concerned
4. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department
5. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar
6. M/File

Attested

R

Hafiz Dr. Muhammad Ibrahim
 01/11/2022
 Assistant Director (Estab)
 Elementary and Secondary Education
 Khyber Pakhtunkhwa Peshawar

B

ATTESTED



73

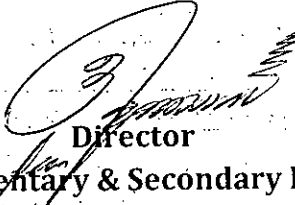
19

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

AUTHORITY LETTER

I Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar do hereby authorize Mr. Muhammad Imran Assistant (Litigation) of this Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar to attend the Khyber Pakhtunkhwa Service Tribunal in connection with filing of para wise comments in Service Appeal No. 407 / 2023 Titled Asif Ali VS Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department.

Dated 05 / 10 / 2023


Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.

74

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

APPEAL NO 907/2023

Mr. Asif Ali SST (BPS-16) District Dir UpperAppellant.

SCANNED
KPST
Peshawar

VERSUS

The Gov't of Khyber Patkhunkhwa through Secretary (E & SE) & others.

WRITTEN STATEMENT ON BEHALF OF DEPENDENT NO-04

Preliminary objections.

1. That the appellant has got no cause of action/locus standi.
2. That the appellant has filed the instant appeal on malafide motives.
3. That the appellant has not come to this honorable tribunal with clean hands.
4. That the appeal is bad for mis-joinder & non joinder of the necessary parties.
5. That the respondent No.4 is proforma defendant and the appellant not claim any relief therefrom.

Para Wise comments on behalf of Respondent No 04.

FACTS.

1. Not related to Dependent No-04.
2. Not related to Dependent No-04.
3. Not related to Dependent No-04.
4. Not related to Dependent No-04.
5. Not related to Dependent No-04.
6. Not related to Dependent No-04.
7. Not related to Dependent No-04.
8. Not related to Dependent No-04.
9. Not related to Dependent No-04.

75

Grounds.

- A. Not related to Dependent No-04.
- B. Not related to Dependent No-04.
- C. Not related to Dependent No-04.
- D. Not related to Dependent No-04.
- E. Not related to Dependent No-04.
- F. Not related to Dependent No-04.
- G. Not related to Dependent No-04.
- H. Not related to Dependent No-04.

It is therefore humbly prayed that the said appeal not related to Dependent No-04 & may kindly be dismissed against 04 as it is departmental matter and pertinent to the administration of the appellat parent Department.



DISTRICT ACCOUNTS OFFICER

DIR UPPER



76

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

Service Appeal No 907/2023
Mr. Asif Ali SST (BPS-16)_ District Dir Upper
Vs

The Gov't of Khyber Pakhtunkhwa through Secretary (E & SE) & Others

AFFIDAVIT

I Irfan Ali Assistant Accountant (BS-17) o/o the District Accounts Office Dir Upper do hereby solemnly affirm and declare on oath that the whole comments, in the Service Appeal No 907/2023 titled Mr. Asif Ali SST Vs Gov't of Khyber Pakhtunkhwa & Others are true & correct to the best of my knowledge & belief & nothing has been concealed from august court.

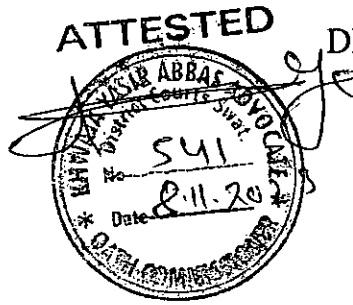
Irfan Ali 8/11/2023

Deponent
RESPONDENT NO-04/

DISTRICT ACCOUNTS OFFICER
DIR UPPER

Cell No -0314-9821919

CNIC No 1570137856255



77

①

Page # 99

Office of the Principal GHSS Shergarh Mardan

To

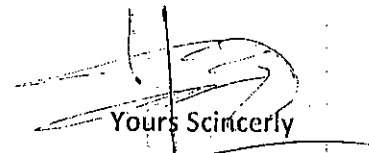
The Director
E& SE department KP Peshawar.

Subject: Submission of enquiry report about Asif Ali SST GHSS Chukiatan

Respected Sir,

It is stated that I had conducted enquiry of Mr Asif Ali SST (Bio/Chemistry) GHS Chukiatan in October 4,5, 2019 and submitted the report by hand in your office, But I came to know through your reminder-I dated 23/10/2020 No 3240, that enquiry reports is still awaiting.

Now duplicated of the said enquiry with related record about discontinuation ord No 33324-30 dated 8/03/2019 and your official notification NO 4105 dated 15/05/2019 for enquiry is herby submitted in your honour for n/action please



Yours Scincerly

Noor Zada Khalozai
Principal GHSS Shergarh
Mardan

Handwritten mark

835
14-1-2021

78

2

Page # 9
190

Inquiry Report About Asif Ali SST

GHS Chukiatan Dir (Bala)

01	Title	Enquiry about the Discontinuation order of Mr. Asif Ali SST GHS Chukiatan Dir (Bala).
02	Inquiry Officer	Mr. Noor Zada Khalozai Principal GHSS Sher Garh
03	Venue	Mardan BPS-19
04	Date	GHS Chukiatan Dir Bala, DEO Office Dir Bala
05	Brief History	04,05/10/2019 Mr. Asif Ali S/O Sahib Zada was appointed as SST (Bio Chemistry) on 14/09/2018. He arrived to School on 15/09/2018. He performed duty till 24/10/2018, But he falls ill psychologically. Firstly, he took Two days Casual Leaves, then one Week and then he submitted his application of medical leave for one month to director through DEO Dir Bala. Headmaster send his absent report to DEO. He reported the case to Director. Director E&SE Department issued the order of Discontinuation on 08/03/2019 of Mr. Asif Ali SST (Bio Chem) GHS Chukiatan. Mr. Asif Ali Submitted an appeal to Director E&SE Department for Inquiry & Justice. The Director Appointed me as inquiry Officer in His Letter No: 4105 Dated: 15/05/2019. So, I started inquiry a little late due to some necessary engagements. I informed Mr. Asif Ali SST & Headmaster of GHS Chukiatan, about my visit on 04/10/2019.
06	TOR's	I reached to GHS Chukiatan. Teachers, in charge, Headmaster and Mr. Asif Ali SST were present. I told them all story & gave open choice to give your opinions verbally and in written statement. They were given free hand for their statements and they hand over their statements to the inquiry officer.
07	Facts/Findings	During 2018 SST Posts advertised for each district by Director E&SE through NTS.Exam held & results were declared. Mr. Asif Ali was among the candidates from Dir Upper. He passed the test and also selected for appointment of SST (Bio Chem). In District Dir Upper He got 4 th Position. His

[Handwritten Signature]
 PRINCIPAL
 G.H.S. Sher Garh
 Mardan

appointment order issued on 14-09-2018. He arrived on 15-09-2018 to GHS Chukiatan. He attends the school duty up to 24-10-2018 regularly. During this time he fell ill psychologically. He sent application for Casual leave for 2 days on 24-10-2019. Then for One week leave on 29-10-2018. As he attend the Doctors, Clinic Regularly in Peshawar & Doctor advised him for bed rest for one week. In charge HM sends a letter to DEO Dir Upper about the absentee of Mr. Asif Ali that he has remained absent since 24-10-2018.

On 08-11-2018 on the same date i.e. 08-11-2018 DEO called explanation from Mr. Asif Ali that why you are absent from school duties since 24-10-2018. On 09-11-2019 Mr. Asif Ali Submitted explanation in the office of DEO Male Dir Upper with his request.

Then Mr. Asif Ali send an application to Director through DEO Male for One Month Medical Leave as advised by Doctor due to his Psycho problem.

Date on this application is not mentioned, But Director mark this application to Karamul Wahab for process on 26-11-2018. On

17-12-2018 HM send another absent report of Mr. Asif Ali to DEO & also told him that He has not given the reply of his explanation. While he has already given his reply to DEO on 09-11-2018. Which is marked by DEO to ADEO for Speak.

On 22-12-2018 DEO Male Dir Upper sent absent report of Mr. Asif Ali to Director and also request him for action not explained his original position nor his corresponding.

In the Light of DEO reports about Mr. Asif Ali SST, Director E&SE department Peshawar issued an amazing letter of discontinuation of service on 08-03-2019. They wrote

(" The Contract in respect of Mr. Asif Ali SST (BIO CHEM)GHS Chukiatan Dir Bala is hereby discontinued w.e.f 20-11-2017 w.e.f 24-10-2018 as reported by DEO male Mardan vide 1131-32 Dated 22-12-2018.")


In letter No:64 dated 22-03-2019 by DEO Dir Upperto the Director reported that your order No:2224-30 dated

11-9
GHS
District

85

4

		<p>08-03-2019 is ambiguous, because the <u>date w.e.f 20-11-2017 mentioned in your letter is not correct as well as your office mentioned that "as reported by the DEO Male Mardan where as your office endorsed office copy to this office . He requested for re-enquiry while first enquiry also not conducted.</u></p> <p>After the above letter on <u>22-03-2019</u> Director issued another office order about the discontinuation of Mr. Asif Ali SST service Corrected all mistakes but amazingly signed by <u>14-03-2019</u> before the DEO letter for correction.</p> <p>Mr. Asif Ali SST (BIO Chem) submitted an <u>appeal</u> against the above order to Director on 21-03-2019. In the light of this appeal Director E&SE nominated the undersigned for inquiry as inquiry officer in his notification No: 4105 dated 15-05-2019. I conducted my this inquiry on 04-05/10/2019.</p>
08	Conclusion	<p>In the Light of above visit, searching, document, checking record and listening of HM GHS Chukiatan, Mr. Asif Ali SST (Bio Chem) Teachers & students of the school, I reached to the conclusion that:</p> <ul style="list-style-type: none"> • Mr. Asif Ali submitted his application for <u>casual leave and medical leave time to time</u> but he received <u>no written response in the from of Yes or No</u> • In-charge HM send the absent report of Mr. Asif Ali SST (Bio Chem) to DEO two times on <u>08-11-2018 & 17-12-2018</u> But He <u>didn't mention the original position of (his illness) to DEO in any of his letter which create ambiguity.</u> • In his statement for inquiry officer during that time of <u>enquiry "HM mentioned that He was ill & were Mentally Depressed"</u>. But <u>HM not mentioned this illness in his absenteeism report to DEO about Mr. Asif Ali SST.</u> • In-charge HM GHS Chukiatan mentioned in his letter to DEO dated 17-12-2018 in line <u>No: 8,9</u> that Mr. Asif Ali has not responded to explanation called by your office till this time i.e. <u>17-12-2018</u> while Mr. Asif Ali submitted his <u>explanation reply with DEO on 09-11-2018.</u> On the front of his explanation DEO put his remarks to ADEO for Speak with his initial signature.


 P. S. S. S. S. S.
 G. S. S. S. S. S.
 G. S. S. S. S. S.

(81)

(5)

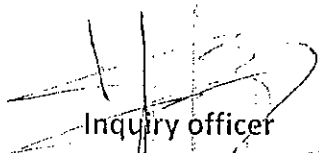
Page # 95
187

- DEO Dir Upper did not inform Mr. Asif Ali when he was ill that his reply accepted or rejected. No letter to Mr. Asif Ali about this, which was the duty DEO Dir Upper.
- When DEO Dir Upper reported the absentee of Mr. Asif Ali SST To Director, here he also not mentioned it that He is ill. This shows that DEO was not informed about the illness or DEO not wanted to mention real position to Director who is responsible, DEO or HM? ?
- When on the advice of Doctor Mr. Asif Ali send an application to Director for One-month extra ordinary medical leave on 26-11-2018. Here was no record in DEO office, whether this application accepted or rejected. **No one listen him. No one enquired his original position.**
- The Directorate Order NO: 2224-30 dated 08-03-2019 about the discontinuation of Mr. Asif Ali service was full of errors & ambiguities (Orders attached). Which was corrected after some days, When DEO Dir Upper reported in his letter NO: 64 dated 22-03-2019 to the Directorate.
- Mr. Asif Ali told in his statement that mostly I attended the school, But in-charge HM not allowed me for putting attendance in register, & used to say that DEO verbally ordered him not to allow Mr. Asif Ali for attendance in register only after winter vacations I was allowed. In March 2019, I attended the school regularly & put signature in attendance register. (attached)
- When the inquiry officer asks from teachers & students about the illness of Mr. Asif Ali, they all became witness of his illness. Students verbally and teachers in the statements of HM, when they put their signatures on HM statement (attached). In last two lines HM stated that **"the concerned teacher is suffering from a mental depression and is unable to attend school duty"**
- During my inquiry I clearly observed that "the teachers concerned was really ill & his treatment was in progress, I checked his drugs & prescriptions and medical reports, But at that time he recovered sufficiently & according to

82

6

		<p>teacher now his position is far better .</p> <ul style="list-style-type: none"> • <u>No inquiry was conducted in any stage no show cause issued to the teacher; no personal hearing occurred by authority.</u>
09	Recommendations	<p>In the light of above detailed inquiry</p> <p>Whereas no proper process followed for the removal of concerned teacher whereas the concerned teacher not properly deal by authority nor listened by someone properly.</p> <p>Whereas several technical, legal & written mistakes are in the process shows dishonesty of some persons in process which <u>lose the stands of authority.</u></p> <p>Whereas the teacher was an <u>intelligent, healthy person at the time of selection</u> and became ill suddenly which is the authority of Almighty Allah & No one has own power/authority to save himself from illness & whereas he had needed <u>moral & mental support at that time</u>, but no one did so.</p> <p>Therefore, in the light of above points & on humanity grounds it is recommended to ,</p> <ol style="list-style-type: none"> 1. Set aside order No: 2224-30 dated 08-03-2019 & his substituted 14-03-2019 dated 08-03-2019 from the date of his issue. 2. He may adjust in some nearly High/Higher Secondary School. 3. Intact his seniority but allowed him the salary from his taking over charge to <u>March 2019</u> as he performed duty till that time.


 Inquiry officer
 Noor Zada Khalozai

Principal GHSS Sher Garh

Mardan

BPS - 19