

BEFORE THE HONORABLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

Service Appeal No.392/2024


Khaista Muhammad S/O Said Muhammad R/O Chukyattan GGHS Chukyattan
Dir Upper.
(Appellant)

Versus

1. Director, Elementary and secondary Education Khyber Pakhtunkhwa Peshawar,
and others. (Respondents)

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Deponent

Next date - 03-07-24

①

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Dir Upper.
(Appellant)

Versus

1. Director, Elementary and secondary Education Khyber Pakhtunkhwa Peshawar,
and others.
(Respondents)

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 13892

Dated 02-07-24

JOINT PARA WISE REPLY ON BEHALF OF
RESPONDENT No. 1&2.

Respectfully Sheweth:-

PRELIMINARY OBJECTIONS

1. That the Appellant is not the "aggrieved" person with the meaning of Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974.
2. That the Appellant has got no cause of action /locus standi to file this service appeal because the Appellant did not come on merit.
3. That the Appellant has not come to this Honorable court with clean hands rather than the instant service appeal is mainly based on malafide intentions just to put pressure on the respondent department for illegal promotion.
4. That the Appellant is estopped by his own conduct.
5. That the instant service appeal suffers from laches, hence not maintainable in the present form.
6. That the service appeal in hand is badly barred by the relevant provision of Law/Rules/Policy in Field.

7. That the appellant was absent on the date fixed for typing test, and did not appear before the Departmental Promotion Committee. (2)

ON FACTS

1. Para -1 of the facts pertains to record, needs no comments.
2. Para -2 of the facts pertains to record, because he has not submitted any documents for compulsory entry in his service book, nor he had attached with the instant service appeal.
3. Para -3 of the facts is incorrect, hence denied. and further stated that the seniority list attached with the instant service appeal is not issued by the office of the respondent No.2. whereas, as per seniority list of class-iv lying in the domain of the respondent No.2 , the appellant has been placed at serial No.116 of the seniority list. **(Copies of the final seniority list attached is "A")**.
4. Para-4 of the facts is correct to the extent of the promotion orders issued vide different promotion order dated 06-12-2019 & 02-01-2020. However, in detail it is stated that the respondent No.2 published a notice with the direction that all the class-iv employees under the supervision of the respondents No.2 should appear for test on dated 26/11/2019 along with their credentials, but on the date fixed the appellant did not appear before the departmental selection committee and remained absent on the date fixed for typing test so not considered for promotion, while the private respondents who although was junior to the appellant qualify/succeeded in the typing test, so considered for promotion.

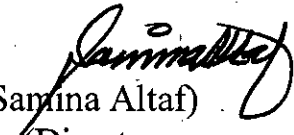
(Copy of the notice is attached as "B", Copy of the working papers for promotion are attached as "C", Copy of the minutes of DPC is attached as "D", Copy of the attendance list of the class-iv is attached as "E" Copy of the result card of typing test of the promotes are attached as "F", Copy of the promotion order of the private respondents No.3 to 5 is attached as "G"), copy of the reply of show cause notice of the DPC is attached "H".

- 5. Para -5 of the facts is correct, however, the ibid appeal was dismissed due to lack of jurisdiction.
- 6. Para-6 of the facts pertains to record, needs no comments.
- 7. Para-7 of the facts is incorrect; details have been submitted in the foregoing Para's.

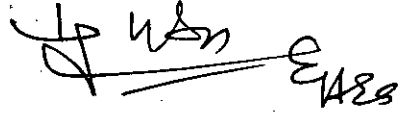
GROUND

- A) In correct and not admitted. The stand of the Appellant is without any moral and legal justification on the grounds that the appellant has been treated as per law and policies.
- B) Incorrect hence denied. detail has been submitted in the facts above.
- C) Incorrect hence denied. detail has been submitted in the facts above.
- D) Incorrect hence denied. detail has been submitted in the facts above.
- E) Incorrect hence denied. detail has been submitted in the facts above.
- F) Incorrect hence denied. detail has been submitted in the facts above.
- G) Legal, however, the respondents also seek permission to raise additional grounds/case laws during arguments on the date fixed.

It is, therefore, humbly prayed that on acceptance of the above submission, the instant time barred service Appeal may very graciously be dismissed in favor of the answering respondents with cost.


(Samina Altaf)

Director,
Elementary and secondary education
Peshawar Khyber Pakhtunkhwa Peshawar
Respondent No. 1



(Hussan Ara)
District Education Officer (F)
Dir Upper
Respondent No. 2

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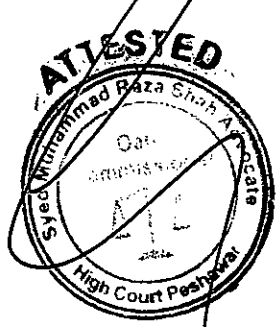
Affidavit

I, Hussan Ara DEO(F) Dir Upper hereby solemnly affirm and declare that contents of the accompanying para wise reply are true and correct to the best of my knowledge and belief and nothing has been concealed from this August court.

It is further stated on oath that the answering respondents have neither been placed ex-parte nor their defense struck off.

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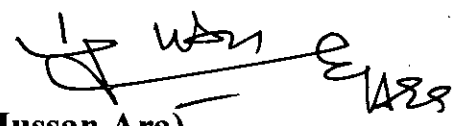
Deponent
(Hussan Ara)



01 JUL 2024

AUTHORITY LETTER

I, Hussan Ara, District Education Officer Female Dir Upper do hereby authorized Mr. Mr. Majeed Ullah Superintendent BPS-17 o/o the DEO(F) Dir Upper to submit the comments /reply in Service Appeal No.392/2024, Title: Khaista Muhammad v/s Government of KP and others, hence an authority letter is hereby issued in favor of the above named office.



(Hussan Ara)
District Education Officer (F)
Dir Upper
Respondent No. 2

o/o DEO (F) DIR (U)
Finally Seniority List of Class-IV DIR(U) 2023.

(A)-6

S#	Seniority No.	Name	Father Name	Date of Birth	Desig	School	Date of 1st Appt.	Qualification
2	1	Gul Wali	Ghulam Wali	11-7-1965	Chowkidar	GGPS Sawmi Payeen	1-11-1997	NII
3	2	Sherin Zada	Zainullah	24/10/1958 ✓	Chowkidar	GGPS Gurrat	11-10-1987	NII
4	3	Gul Sahibzada	Abdus Satar	17/10/1967	Chowkidar	GGPS Biyar	15-10-1987	NII
5	4	Ghani Khan	Aman Ullah	17/10/1968	Chowkidar	GGPS Akhgram	17-10-1987	
6	5	Sardar Said	Niaz Bin Bacha	16-5-1905	Chowkidar	GGPS Katan Bala	19-10-1987	NII
7	6	Attaullah Khan	Abdul Hadi Khan	9-5-1962 ✓	Chowkidar	GGPS Samkot	21-10-1987	SSC
8	7	Sher Zada	Mohabat Khan	12-7-1969	Chowkidar	GGPS Khan Shaheed	2-11-1987	NII
9	8	Ahmad Ullahi	Sad Zarin	25/01/1963	Chowkidar	GGPS Manay	12-1-1988	
10	9	Dilawar Khan	Amir Muhammad Khan	18-5-1905	Chowkidar	GGPS Rehankot	21-2-1988	NII
11	10	Bacha Rahim	Mula said	4-5-1963	Chowkidar	GGPS Qashqari Payeen	1-4-1988	NII
12	11	Sher Ali	Yar Zamin	20/08/1970	Chowkidar	GGPS Kass Wari	24-8-1989	
13	12	Bakht Zamin	Rahmat Karim	27/08/1966	Chowkidar	GGPS Daskore Bala	27-8-1989	
14	13	Rahim Shah	Akbar Sad Khan	18-5-1905	Chowkidar	GGPS Alawral	21-9-1989	
15	14	Hidayat ul Haq	Israr ul Haq	3-11-1971	Chowkidar	GGPS Noorkhal	11-3-1990	SSC
16	15	Mehmood Khan	Kabal Jan	19/06/1965	Chowkidar	GGPS Dag Almas	19-8-1990	NII
17	16	Muhammad Zeb	Noor Hamid Jan	7-1-1966	Lati	GGHSS Dir	12-11-1990	NIL
18	17	Fazal Rabbi	Abdur Raof	4-11-1964	Chowkidar	GGPS Dir No 2	12-4-1991	NII
19	18	Inayatullah	Sharifullah	22/04/1969	Chowkidar	GGPS Bundaish	22-4-1992	NII
20	19	Nizamud Din	Rahmat Khaliq	5-1-1971	Chowkidar	GGPS Dogram	1-5-1992	
21	20	Fazal Hamid	Abdul Hamid	1-7-1969		GGHSS Barawal Bandi	7-1-1993	NIL
22	21	Dilaram Khan	Naimat Khan	18-5-1905	Chowkidar	GGPS M-Q Chukyatan	1-5-1993	NII
23	22	Bakht Alam	Ajbar Khan	15/12/1958	Chowkidar	GGPS Hazan Bala	18-5-1993	NII
24	23	Tazamin Khan	Muhammad Hassan	11-5-1905	Chowkidar	GGPS Bin Payeen	19-5-1993	NII
25	24	Muhammad Rahman	Rahman Shah	21-5-1905	Chowkidar	GGPS Panakot No.2	19-5-1993	NII
26	25	Zafar Khan	Swal Zar Khan	24-5-1905	Chowkidar	GGPS Thali	1-7-1993	NII
27	26	Gul Dad Khan	Shad Khan	26-5-1905	Chowkidar	GGPS Pataw	13-6-1994	
28	27	Latif Ullah	Khani Mulla	7-1-1972	N-Q	GGMS Kass	26-6-1994	NII
29	28	Walayat	Muhammad Yar Khan	1967	sweeper	GGMS Kass Dir	26-6-1994	NII
30	29	Khair Hazrat	Ghulam Hazrat	22/08/1965	Chowkidar	GGPS Shaw	17-8-1994	NII
31	30	Ihsanullah	Ghulam Habib	7-1-1974	Chow	GGHSS Dir	12-9-1994	NIL
32	31	Karim Khan	Amir Muhammad Khan	21-5-1905	Chowkidar	GGPS Dir No 1	1-12-1994	NII
33	32	Ayub Khan	Maradar Khan	21/02/1962	Chowkidar	GGPS Nagrail	21-2-1995	
34	33	Wazir Zada	Sardar Khan	22/02/1965	Chowkidar	GGPS Gogyal	22-2-1995	
35	34	Akbar Ali	Khushak Muhammad	6-11-1965	Chowkidar	GGPS Moha	29-4-1995	SSC
36	35	Nasrullah	Bakht Rawan	28-5-1905	Chowkidar	GGPS Bagh Kadl Khel	13-6-1995	
37	36	Aqib ur Rahman	Gul Rahman	23-5-1905	Chowkidar	GGPS Bandagal	2-11-1995	NII

District Education Officer
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38	37	Gul Zameen Khan	Pacha	24-5-1905	Chowkidar	GGPS Sharmal	3-11-1995	NII
39	38	Amir Nawab	Noor Hameed Jan	22-5-1905	Chowkidar	GGPS Jabalook	4-11-1995	NII
40	39	Asadullah	Sarbiland Khan	11-10-1973	Chowkidar	GGPS Abakand No 2	4-11-1995	NII
41	40	Muhammad Nabi	Rahmat Nabi	18-5-1905	Chowkidar	GGPS Qulandl Payeen	22-11-1995	NII
42	41	Karimullah	Muhammad Rasool Khan	1-1-1976	Chowkidar	GGPS Hkhkaly	22-11-1995	NII
43	42	Baz Muhammad	Aurang Zeb	1-1-1971	NO	GGHS Sheringal	29-11-1995	Middle
44	43	Nusrat Bibi	Qazi Muhammad	2-12-1973	swesper	GGHS Sheringal	29-11-1995	NII
45	44	Sadullah Khan	Muhamad Afzal Khan	12-5-1905	Chowkidar	GGPS Kair	1-12-1995	NII
46	45	Muhamad Wahab	Hakim Khan	19/10/1969	Chowkidar	GGPS Dodba	1-12-1995	NII
47	46	Umar Zareen	Hazrat Khan	11-5-1905	Chowkidar	GGPS Gwaldal	4-12-1995	NII
48	47	Umar Zareen	Hazrat Khan	11-5-1905	Chowkidar	GGPS Bifa Gwaldal	4-12-1995	NII
49	48	Aman Khan	Mir Baz Khan	19-5-1905	Chowkidar	GGPS Jughabanj	6-12-1995	
50	49	Sarbiland Khan	Toor Khan	11-5-1905	Chowkidar	GGPS Seratal	15-12-1995	NII
51	50	Muhammad Naem	Wali Muhammad	11-5-1905	Chowkidar	GGPS Jarjuri	30-12-1995	NII
52	51	Hameedullah	Muhammad Munawar Khan	3-3-1973	Chowkidar	GGPS Dam Jaar	18-1-1996	NII
53	52	Kalat Khan	Gul Faraz Khan	19/01/1973	Chowkidar	GGPS Markhano	19-1-1996	
54	53	Gul Muhammad	Gul Faras Khan	22/03/1973	Chowkidar	GGPS Daskore (P)	20-1-1996	SSC
55	54	Mian Fazal Rabbi	Mian Qasim Jan	30/04/1963	Chowkidar	GGPS Mano Banda	6-2-1996	NII
56	55	Jehan Badshah	Mamoor Khan	16/02/1961	Chowkidar	GGPS Guli Bagh	16-2-1996	
57	56	Bahadar Said	Mehmood Jan	27-5-1905	Chowkidar	GGPS Nasrat	11-4-1996	NII
58	57	Hazir Khan	All Yar Khan	14-5-1905	Chowkidar	GGPS Panjkoro	24-4-1996	
59	58	Sher Badshah	M. Shah Haroon	28-5-1905	Chowkidar	GGPS Badalal(P)	31-7-1996	SSC
60	59	Usman Zada	Noor Muhammad	24-5-1905	Chowkidar	GGPS Darora No 2	1-11-1996	NII
61	60	Jehan Gir Khan	Amir Badshah Khan	26-5-1905	Chowkidar	GGPS Nawo	1-11-1996	NII
62	61	Said Ahmad Shah	Mehood Jan Pacha	27-5-1905	Chowkidar	GGPS Chum Sheringal	8-11-1996	NII
63	62	Bacha Sher	Ghawas Khan	31-5-1905	Chowkidar	GGPS New Kakad	8-11-1996	
64	63	Amir Muhammad	Zain Ullah	11-11-1960	Chowkidar	GGPS Sankore No 2	11-11-1996	
65	64	Gul Zarin	Mian Umar Jan	13-5-1905	Chowkidar	GGPS Kot Mula Gujar	12-11-1996	
66	65	Ezof Khan	Bahadar Khan	11-12-1967	Chowkidar	GGPS Shahi Bagh	12-11-1996	
67	66	Badshah Khan	Izat Khan	23-5-1905	Chowkidar	GGPS Jatkool	3-12-1996	NII
68	67	Luqman Zareen	Ahmad Jan	3-4-1975	Chowkidar	GGPS Haygy Sharqi	3-12-1996	SSC
69	68	Shah Rahman	Sultan Rahman	21/04/1968	Chowkidar	GGPS Qashqari Bala	3-12-1996	NII
70	69	Badar Khan	Rahim Ullah	1-1-1970	sweeper	GGHS Kotkay	1-1-1997	NII
71	70	Bahadar Khan	Rahim Ullah	1-1-1970	sweeper	GGHS Kotkay	1-1-1997	NII
72	71	Jam Khan	Haji Shal Khan	24-5-1905	Chowkidar	GGPS Makrala	2-1-1997	NII
73	72	Nasrat Khan	Zamin Khan	19-5-1905	Chowkidar	GGPS Landay Sha	7-1-1997	
74	73	Zor Muhammad Khan	Shamshi Khan	3-9-1967	Chowkidar	GGPS Babo	9-3-1997	
75	74	Fazal Rahman	Abdur Rahman	17-5-1905	Chowkidar	GGPS Barkand	21-11-1997	NII

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76	75	Rahat Ullah	Ghulam Muhammad	7-1-1978	NQ	GGHSS Gandigar	22-11-1997	NIL
77	76	Ghulamudin	Ghulam MUhammad	7-1-1983	CHI	GGHSS Gandigar	22-11-1997	NIL
78	77	Salah ud Din	Izrat Gul	16-5-1905	Chowkidar	GGPS Dehri Hatan	29-11-1997	NIL
79	78	M.Azam Khan	Mirfullah	4-5-1973	Chowkidar	GGPS Tangay	29-11-1997	
80	79	M.Khisro	Shamsur Rahman	2-1-1968	Chowkidar	GGPS Dislawar	1-12-1997	SSC
81	80	Muhd Burhan	Mohammad Ullah	7-1-1969	Chowkidar	GGCMS Mula Pavr	2-12-1997	
82	81	Bakht Badshah	Sher Bahadar Khan	12-2-1978	Chowkidar	GGPS Bakanay	2-12-1997	
83	82	Bibi Imran	Abdustar	12-1-1972	sweeper	GGHS Ganori	22-12-1997	NIL
84	83	Ajbar Khan	Sultan Khan	11-5-1905	Chowkidar	GGPS Kilot	1-1-1998	NIL
85	84	Gul Rahman	Sadar Muhammad	23-5-1905	Chowkidar	GGPS Baghro	1-4-1998	NIL
86	85	Ali Said Gul	Sahibzada	20/01/1971	Chowkidar	GGPS Bekary	1-5-1998	NIL
87	86	Bakaht Sahah Zeb	Jehanzeb	5-11-1964	NQ	GGHS Samkoot	5-11-1998	NIL
88	87	Jehan Riaz	Ziwar Khan	7-1-1970	sweeper	GGHS Samkoot	5-11-1998	NIL
89	88	Said Muhammad Nasir	Said Bakhtawar Jan	15/03/1973	Chowkidar	GGPS Tawso	23-12-1998	SSC
90	89	Inayat Ullah	Khan Bahadar	7-1-1978	Chow	GGHSS Warl Bala	4-3-1999	NIL
91	90	Shinaba	Shah Khan	1-2-1978	Chowkidar	GGPS Bada Barikot	21-3-1999	NIL
92	91	Nasurullah	Fateh Rehman	1-1-1970	LAtt	GGHSS Dir	17-12-1999	NIL
93	92	Bacha Haram	Saida Jan	1-1-1972	LAtt	GGHSS Dir	17-12-1999	NIL
94	93	Umir Badshah	Jan Muhammad	1-1-1971	Chow	GGHSS Dir	21-12-1999	NIL
95	94	Asil Zada	Saidam Jan	5-2-1963	Chowkidar	GGPS Osoral	2-5-2000	
96	95	Muhammad Yousaf	Faiz Rahim	13-5-1905	Chowkidar	GGPS Shahoor	10-5-2000	NIL
97	96	Muhd Zaman	Rasol Khan	1-1-1972	Chowkidar	GGPS Karbadal	23-12-2000	
98	97	Noormina	Bakht Rawan	7-1-1974	sweeper	GGMS Badalai	6-4-2001	NIL
99	98	Darf Khan	Inzar Gul	21-5-1905	Chowkidar	GGPS Sarpo Tanl	1-7-2001	NIL
100	99	Ajmal	Muhamad Jan	4-6-1905	Chowkidar	GGPS Tikarkot	1-10-2001	NIL
101	100	Bakht Zamin	Manda Azim Khan	22/09/1959	Chowkidar	GGPS Kandaro	22-9-2002	
102	101	Rahmat Khan	Muhammad Jan Khan	7-1-1969	N-Q	GGMS Panakot	12-1-2003	NIL
103	102	Said Badshah	Nadar Khan	1-4-1959	NQ	GGHS Sundrawal	22-11-2003	NIL
104	103	Rahat Begum	Muhammad Kahn	1-1-1965	sweeper	GGHS Sundrawal	22-11-2003	NIL
105	104	Niamat Ullah	Wazir Khan	23/11/1971	Chowkidar	GGPS Shenkaral	23-11-2003	
106	105	Gohar Ali	Mian Abdul Ghafar	23/11/1982	Chowkidar	GGPS Shagal Sundal	23-11-2003	
107	106	Sultan Ali	shal Khan	3-9-1975	Chowkidar	GGPS Barikot	24-11-2003	SSC
108	107	Badshah Khan	Shah Zamin Khan	13-5-1905	Chowkidar	GGPS Sheratkal	29-11-2003	
109	108	Muhammad Siraj	Muhammad Shbar	13-5-1905	N-Q	GGMS Amlook Nar	1-12-2003	NIL
110	109	Lashkar Khan	Malook Shah	7-1-1959	sweeper	GGMS Barikot	1-12-2003	NIL
111	110	Riyaz Uddin	Bakht Zada	7-1-1968	sweeper	GGMS Tarpatar	1-12-2003	NIL
112	111	Wazir Zada	Arsala	7-1-1972	N-Q	GGMS Tarpatar	1-12-2003	NIL
113	112	Muhammad Younas	Lashkar Khan	1-2-1978	N-Q	GGMS Barikot	1-12-2003	NIL

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ATTESTED

114	113	Haji Muhammad	Abdul Jabbar					
115	114	Badshah Ayub	Zahir Khan	7-1-1981	N-Q	GGMS Jughabzan	1-12-2003	NII
116	115	Hayat Ullah	Hakim Khan	7-1-1982	N-Q	GGMS Duro	1-12-2003	NII
117	116	Khista Muhammad	Said Muhammad	20/04/1980	sweeper	GGMS Duro	1-12-2003	NII
118	117	Chaman Dasta	Faqir Saeed	22/05/1987	NQ	GGHS Chulhatan	1-12-2003	SSC
119	118	Rahimullah	Wzir Muhammad	31/12/1959	sweeper	GGMS Amlök Nar	1-12-2003	NII
120	119	Hamayoon Khan	Mubarak Jan	1-1-1974	NQ	GGHS Dir	1-1-2004	NIL
121	120	Mohsina	Saeed Rahman	6-6-1905	Chowkidar	GGPS Sawal Bala	31-1-2004	NII
122	121	Umar Rahim	Mula Said	26-5-1905	sweeper	GGMS Panakot	1-2-2004	NII
123	122	Hamidu Rahman	Habibu Rahman	17-5-1905	Chow	O/O DEO(F) Dir	4-4-2004	NII
124	123	Abdul Basit	Sherin					
125	124	Abadur Rahman	Tawas Khan	1-1-1994	N-Q	GGMS Daskre	13-4-2004	NII
126	125	Alam Zeb	Zarawar Khan	23/04/1969	Chowkidar	GGPS Kotkay	1-9-2004	SSC
127	126	Imtiaz Khan	Aqal Zarin	5-6-1972	NQ	GGHS Chaper	29-3-2005	SSC
128	127	Bacha Hilal	Muhammade Nizar	7-6-1905	Chowkidar	GGPS Warl(PO)	1-4-2005	
129	128	Bakhat Zaban	Shabqadar	7-1-1960	sweeper	GGHS Warl Payeen	1-4-2005	NIL
130	129	Muhammad	Gul Baz Khan	12-10-1965	NQ	GGHS Dir	1-4-2005	NIL
131	130	Salah ud Din	Nazar Muhammad	7-1-1968	NQ	GGHS Warl Payeen	1-4-2005	NIL
132	131	Wahid Zada	Muhammad Zada	14/06/1966	Chowkidar	GGPS Bagh Manal	1-4-2005	NII
133	132	Atta ur Rahman	Fatli Rahman	4-6-1905	Chowkidar	GGPS Nawra	3-5-2005	NII
134	133	Arshad Ali	Shehryar Khan	16/09/1984	Chowkidar	GGPS Mina khwar	20-5-2005	NII
135	134	Khurshid Ali	Shreen Zada	1-2-1985	Chowkidar	SDEO (F) Warl	1-7-2005	SSC
136	135	Mohammad Idrees	Ghaus ur Rahman	20/10/1986	NQ	GHSS Sundal	1-4-2006	FA
137	136	Shuja Uddin	Muhammad Tahir	2-6-1905	Chowkidar	GGPS College Colony	8-6-2006	NII
138	137	Zahira	Amir Zada	4-5-1988	N-Q	GGMS Doag Payeen	19-9-2006	SSC
139	138	Noor Uddin	Nadar Khan	01/07/1971	sweeper	GGMS Doag Payeen	19-9-2006	NII
140	139	Gul Shah Zeba	Wali Ahmad Jan	2-3-1972	N-Q	GGHS Jabbar	19-9-2006	
141	140	Ali Akbar	Muhd Tawar Khan	14-5-1905	Caller	GGCMS Surbat Bala	20-9-2006	NII
142	141	Momin Khan	Muhd Tawar Khan	25-5-1905	Chowkidar	GGPS Warl B)	20-9-2006	
143	142	Jehanziba	Yousaf	30-5-1905	Chowkidar	GGPS Sundrai	20-9-2006	NII
144	143	Uzaz Muhammad	Mian Jabbar	7-1-1971	sweeper	GHSS Sundal	20-9-2006	NIL
145	144	Shaf Ullah	Noor Muhammad	4-7-1980	N-Q	GGCMS Surbat Bala	20-9-2006	NII
146	145	Abideen	Muharam Khan	5-5-1988	Chowkidar	GGCMS Sahib Abad	20-9-2006	SSC
147	146	Amjad Ali	Jehan Zeb	1-1-1998	L.Att	GGHS Samkoot	20-9-2006	NIL
148	147	Ajab Khan	Jehan Zeb	19/09/1979	CH	GGHS Samkoot	20-9-2006	NIL
149	148	Ajab Khan	Muhammad Rawan	20/03/1983	Chowkidar	GGCMS Sahib Abad	20-9-2006	
149	148	Zarin Taj	Muhammad Rawan	20/09/1978	Chowkidar	GGCMS Mera S.K	20-9-2006	
150	149	Asada Jan	Khalista Pacha	7-1-1965		GGHSS Barawal Bandl	20-9-2006	NIL
151	150	Anwar Sulat	Khalista Pacha	7-1-1977		GGHSS Barawal Bandl	20-9-2006	NIL

District Education Officer
 Female Upper Dir

District Education Officer
 Female Upper Dir

ATTESTED

(A-10)

341	341	Sajid Ahmad						
342	342	Muhammad Ishaq	Muhammad Ismail	4-7-1995	Chowkidar	GGPS Jelar No 2	27-10-2016	
343	343	Wasim Sajjad	Khaista Muhammadf	27/03/1993	Chowkidar	GGPS Katigam	27-10-2016	
344	344	Syed Sahibullah	Ahmad Saeed	1-1-1995	NQ	GGHS Kotkay	1-1-2017	NII
345	345	Arif Muhammad	Sher Zada	2-5-1989	Chowkidar	GGPS Ganori	12-1-2017	NII
346	346	Sohail Ahmad	Sani Muhammad	10-4-1999	Chowkidar	GGPS Chumra	17-1-2017	NII
347	347	Sami Ullah	Muhammad Yousaf	15/04/1991	Chowkidar	GGPS Mina Doog	14-3-2017	MA
348	348	Nasreen Bibi	Khan Zarin	2-3-1988	N-Q	GGMS Tikarkot	12-4-2017	NII
349	349	Iman Ullah	Sabir Khan	1-1-1992	sweeper	GGMS Tikarkot	12-4-2017	NII
350	350	Rabia Bibi	Shebar Khan	1-1-1994	N-Q	GGMS Daramdala	13-4-2017	NII
351	351	Anwar Ullah	Sultan Yousaf	15/01/1992	sweeper	GGMS Daramdala	13-4-2017	NII
352	352	Inayat Shah	Jan	4-2-1995	N-Q	GGMS Mian Banda	14-4-2017	NII
353	353	Sajjad Ali	Shah Zareen	13/03/1999	sweeper	GGMS Mian Banda	14-4-2017	NII
355	354	Said Shah Faisal	Sarwar Jan	11-6-1998	Chowkidar	GGPS Ali Gasar	19-4-2017	NII
356	355	Imran Khan	Aziz ur Rahman	5-12-1995	NQ	O/O DEO(F) Dir	22-4-2017	BA/Dir
357	357	Farooq Jana	Habib Raza khan	3-7-1999	Chowkidar	GGPS Kass Dir	6-5-2017	NII
358	357	Wasim Salad	Abid Subhan	2-7-1989	sweeper	GGMS Shalga	18-5-2017	NII
359	359	Arsalan Khan		1-1-1995	NQ	GGHS Kotkay	1-7-2017	NII
360	359	Rahmanullah	Amir Ullah Khan	6-10-1997	NQ	GGHS Akheram	22-7-2017	SSC
361	361	Jafar khan	Taj Muhammad	18/02/1973	Chowkidar	GGPS Barawal	22-7-2017	NII
362	361	Ghaus ur Rahman	Shams ul Alam	01/12/19978	N-Q	GGMS Shalga	27-7-2017	NII
363	363	Abbas	Dil Huram Khan	26/07/1992	Chowkidar	GGPS Salool	16-8-2017	NII
364	363	Uabidullah	Juma Khan	1-1-1987	Chowkidar	GGCMS Mera S.K	24-8-2017	
365	365	Tazamin	Muhammad Sher	2-1-1981	L.Att	GGHSS Dir	20-9-2017	SSC
366	365	Nor Zamin Khan	Bakht Zaman	1-1-1982	N-Q	GGMS Gujaro Kalai	10-10-2017	NII
367	367	Muhammad Nawaz Khan	Muzafar	4-6-1905	Chowkidar	GGPS Chapar	28-10-2017	
368	367	Menhaz	Mukamin Khan	10-3-1993	Chowkidar	GGPS Bibywar	28-10-2017	NII
369	369	Aftab Ahmad Khan	Muhammad Nawab Khan	18/05/1979	sweeper	GGMS Kair Dara	9-11-2017	NII
370	369	Sajid Iqbal	Said Karim	20/04/1999	N-Q	GGMS Kair Dara	9-11-2017	NII
371	371	Qazi Tariq	Qazi Fazal Subhan		NQ	GGHSS Gandigar	1-12-2017	SSC
372	371	Kashif	Shamshad Khan	13/01/1990	Chowkidar	GGPS Kharkanai	10-12-2017	NII
373	373	Saif ullah	Taj Mohamimad khan	18/09/1999	Chowkidar	GGPS Qulandi Bala	10-12-2017	NII
374	373	ishfaq ahmad	sullman	28.08.1999	NQ	O/O DEO(F) Dir	1-5-2018	FA
375	375	Muhammad Suliman	Jalat khan	3-5-1999	NQ	O/O DEO(F) Dir	25-10-2019	FA
376	375	Misbah Ullah	Muhammad Qasim	20-03-1998	Chowkidar	O/O DEO(F) Dir	2-1-2020	FA
377	377	Sultanat Khan		1/1/1996	Behishti	O/O DEO(F) Dir	18-2-2020	FA
378	377	Fazal Mabood	Fazal Khaliq		Chowkidar	GGPS Bin Bala	5-5-2020	NII
379	379	Muhammad Farooq	Muhammad Anwar Khan	6-1-1972	Chowkidar	GGPS Sokai	20-5-2020	NII
380	379	Farooq Azam			Chowkidar	GGPS Garowoni	21-5-2020	FA
					Chowkidar	GGPS Jan Bahtti	21-8-2020	NII

[Handwritten Signature]
 District Education Officer
 Female Upper Dir

ATTACHED

[Handwritten Signature]
 District Education Officer
 Female District Dir Upper

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District Education Officer
Female Upper Dir

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3

میں



OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE DIR UPPER.



©-12

PH No.0944-881900

E-mail deofdirupper@gmail.com

WORKING PAPER FOR THE PROMOTION OF CLASS-IV TO THE POST OF JUNIOR CLERK DIR UPPER.

Name of post to be promoted: - Junior Clerks.

According to the Government Khyber Pakhtunkhwa establishment and administration (Regulation wing) No. SO.(PE)/4-10/SSRC/Ministerial staff/2013 dated 28/01/2013. In which the following departmental promotion committee has constituted.

- | | |
|--|--------------|
| 1. District Education Officer, Female, Dir Upper. | Chairperson. |
| 2. B&AO Office of the District Education Office Female Dir Upper | Member. |
| 3. Assistant District Education Officer P&D Female. | Member. |
| 4. ASDEO (Circle) Dir | Member. |
| 5. Representative of Director | Member. |

Initial Recruitment of Junior Clerks	67%
By Promotion from Class-IV.	33%

S.No	Name of the promotee from class IV to Junior Clerk	Father Name	Date of birth	CNIC	Qualification	BPS	Proposed school	Proposed post	Remarks.
1-	Badshah Rahman	Habib Ur Rahman	03-07-1987	15701-1968421-9	FA	11	GGHS Janbatti	Junior Clerk	Against vacant post

[Signature]
 District Education Officer
 Female Upper Dir

Terms & Conditions:-

- The promotee will be on probation for a period of one year in term of rule-15(1) of Khyber Pakhtunkhwa (Appointment, Promotion and Transfer (Rules, 1989)).
- The promotee will governed by such rules and regulations / polices as prescribed by the Government from time to time.
- If the promotee failed to take over charge with in fifteen days after the issuance of this order his appointment may be deemed as automatically cancelled.
- The errors and omissions in merit etc if found at any stage can be rectified. In case of termination of the candidate he will have no right to claim the order already issued.
- Charge report should be submitted to all concerned.

ATTESTED

- 1. District Education Officer (Female) Dir-Upper
- 2. Assistant District Officer (P&D) (Female) Dir Upper
- ASDEO (Circle) Dir
- B&AO Local Office
- Representative of Director

Chairman [Signature]
 (Member) [Signature]
 (Member) [Signature]
 (Member) [Signature]
 (Member) [Signature]

[Signature]
 District Education Officer
 Female Dir Upper
[Signature]

[Signature] **ATTESTED**
[Signature] [Signature]
 District Education Officer
 Female Upper Dir

ATTESTED



OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE DIR UPPER.

PH No.0944-881900

E-mail deofdirupper@gmail.com

WORKING PAPER FOR THE PROMOTION OF CLASS-IV TO THE POST OF JUNIOR CLERK DIR UPPER.

Name of post to be promoted:- Junior Clerks.

According to the Government Khyber Pakhtunkhwa, establishment and administration (Regulation wing) No: SO.(PE)/4-10/SSRC/Ministerial staff/2013 dated 28/01/2013 the following departmental promotion committee:

- | | |
|--|--------------|
| 1. District Education Officer, Female, Dir Upper. | Chairperson. |
| 2. B&AO Office of the District Education Office Female Dir Upper | Member. |
| 3. Assistant District Education Officer P&D Female. | Member. |
| 4. ASDEO (Circle) Dir | Member. |
| 5. Representative of Director | Member. |

Initial Recruitment of Junior Clerks 67%
 By Promotion from Class-IV. 33%

S.No	Name of the promotee from class IV to Junior Clerk	Father Name	Date of birth	CNIC	Qualification	BPS	Proposed school	Proposed post	Remarks.
1-	Atta Ullah	Suliman	01-01-1992	15701-8378993-3	SSC	11	GGHS Jabber	Junior Clerk	Against vacant post
2-	Azmat Ullah	Inayat Ullah	04-02-1985	15701-5836183-5	BA	11	GGHS Darora	Junior Clerk	Against vacant post

[Signature]
 District Education Officer
 Female Upper Dir

Terms & Conditions:-

- The promotees will be on probation for a period of one year in term of rule-15(1) of Khyber Pakhtunkhwa (Appointment, Promotion and Transfer (Rules, 1989)).
- The promotees will governed by such rules and regulations / polices as prescribed by the Government from time to time.
- If the promotees failed to take over charge with in fifteen days after the issuance of this order their appointments may be deemed as automatically cancelled.
- The errors and omissions in this order if found at any stage can be rectified. In case of termination of the candidate he will have no right to claim the order already issued.

ATTESTED

- 5. Charge report should be submitted to all concerned.
- 6. NTA/DA is allowed.

1- District Education Officer, Female, Dir Upper

Chairperson.

[Signature]

2- B&AO Office of the District Education Office Female Dir Upper

Member

[Signature]

3- Assistant District Education Officer P&D Female.

Member

[Signature]

4- ASDEO (Circle) Dir

Member

[Signature]

5- Representative of Director

Member

[Signature]

[Signature]
 District Education Officer
 Female Upper Dir

[Signature]
 District Education Officer
 Female Dir Upper
[Signature]

ATTESTED



GOVERNMENT OF KHYBER PAKHTUNKHWA
OFFICE OF THE DISTRICT EDUCATION OFFICER
FEMALE DIR UPPER.

PH No.0944-881900

E-mail deofdirupper@gmail.com



①-16

MINUTES OF THE MEETING FOR THE APPOINTMENT OF JUNIOR CLERKS UNDER 33% QUOTA GOVERNMENT SERVANT IN EDUCATION DEPARTMENT DISTRICT DIR UPPER

In order to discuss the appointment of junior clerks under 33% Quota Government servant against vacant junior clerks posts in schools follow of meeting was held in the office of the District Education Officer Female Dir Upper under his chairman ship.

The meeting stated with recitation from the Holy Quran thereafter the chair highlighted the objectives of the meeting in detail the chair asked the committee member their viewpoints regarding the current promotions from Class-IV posts.

According to the Government Khyber Pakhtunkhwa, establishment and administration (Regulation wing) No: SO.(PE)/4-10/SSRC/Ministerial staff/2013 dated 28/01/2013 the following departmental promotion committee.

1. District Education Officer, Female, Dir Upper.
2. B&AO Office of the District Education Officer Female Dir Upper
3. Assistant District Education Officer P&D Female.
4. ASDEO (Circle) Dir
5. Representative of Director

- Chairperson:
 Member.
 Member.
 Member.
 Member.

S No	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Name of Class IV Servant Promoted to Junior Clerk Under 33%	POST	Length of service	Father Name	Address	Date of Birth	CNIC	Acad: Qualif	Prof: Qualif	Speed/ WPM	Proposed post	RP No	Proposed School	Remarks
2	Attaullah	Naib Qasid	10 Years	Suliman	Village Shandal bagh Tehsil Dir	01-01-1992	15701-8378993-3	SSC	Computer literate	45 Words	Junior Clerk	11	GGHS Jabbar	
3	Azmat Ullah	Naib Qasid	12 Years	Inyat ullah	Village Collage Coloney Dir-	04-02-1935	15701-5836183-5	BA	Computer literate	45 Words	Junior Clerk	11	GGHS Darora	

ATTESTED

1- District Education Officer, Female, Dir Upper

Chairperson.

[Signature]

2- B&AO Office of the District Education Office Female Dir Upper

Member

[Signature]

3- Assistant District Education Officer P&D Female.

Member

[Signature]

4- ASDEO (Circle) Dir

Member

[Signature]

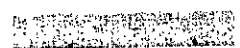
5- Representative of Director

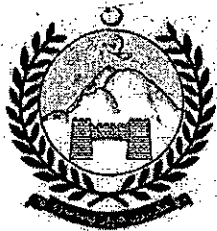
Member

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[Signature]
District Education Officer
Female Dir Upper
Rh.

ATTESTED





GOVERNMENT OF KHYBER PAKHTUNKHWA
OFFICE OF THE DISTRICT EDUCATION OFFICER
FEMALE DIR UPPER.

PH No.0944-881900

E-mail deofdirupper@gmail.com



MINUTES OF THE MEETING FOR THE APPOINTMENT OF JUNIOR CLERK UNDER 33% QUOTA GOVERNMENT SERVANT IN EDUCATION DEPARTMENT DISTRICT DIR UPPER

In order to discuss the appointment of junior clerk under 33% Quota Government servant against vacant junior clerk post in school was held in the office of the District Education Officer Female Dir Upper under her chairman ship.

The meeting started with recitation from the Holy Quran thereafter the chair highlighted the objectives of the meeting in detail, the chair asked the committee members their viewpoints regarding the current promotions from Class-IV post.

According to the Government Khyber Pakhtunkhwa, establishment and administration (Regulation wing) No. SO.(PE)/4-10/SSRC/Ministerial staff/2013 dated 28/01/2013 the following departmental promotion committee attended the meeting.

- 1. District Education Officer, Female, Dir Upper
- 2. B&AO Office of the District Education Office Female Dir Upper
- 3. Assistant District Education Officer P&D Female
- 4. ASDEO (Circle) Dir
- 5. Representative of Director

- Chairperson:
- Member.
- Member.
- Member.
- Member.

S.#	Name of Class IV Servant Promoted to Junior Clerk Under 33%	Father Name	Address	Date of Birth	CNIC	Acad: Qualif	Speed/WPM	Proposed post	BPS No	Proposed School	Remarks
2	Badshah Rahman	Habib Ur Rahman	Village Shandal bagh Tehsil Dir	03-07-1987	15701-1968421-9	FA	30 Words	Junior Clerk	11	GGHS Janbatti	A.V.P

[Signature]
District Education Officer
Female Upper Dir

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District Education Officer (Female) Dir Upper

Chairman [Signature]

Assistant District Officer (P&D) (Female) Dir Upper

(Member) [Signature]

ASDEO (Circle) Dir

(Member) [Signature]

B&AO Local Office

(Member) [Signature]

Representative of Director

(Member) [Signature]

[Signature]
District Education Officer
Female Dir Upper
RL

[Signature]
District Education Officer
Female Upper Dir


~~ATTESTED~~

OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE DIR UPPER.

SUBJECT: TAYPING TEST FOR J/C DATE 26/11/2019 ATTENDANCE SHEET.


S.NO	NAME	FATHER NAME	SCHOOL/OFFICE	DESIGNATION	SIGNATURE
1	Gul Muhammad	Gul faras Khan	GGPS Daskore (P)	Chowkidar	Absent
2	Luqman Zareen	Ahmad Jan	GGPS Haygy Sharqi	Chowkidar	Absent
3	Sher Badshah	M.Shah Haroon	GGPS Badalai(P)	Chowkidar	Failed
4	M.Khisro	Shamsur Rahman	GGPS Dislawar	Chowkidar	Absent
5	Said Muhammad Nasir	Said Bakhtawar Jan	GGPS Tawso	Chowkidar	Absent
6	Khista Muhammad	Said Muhammad	GGHS Chukiatan	NQ	Absent
7	Arshad Ali	Shehryar Khan	SDEO (F) Wari	Chowkidar	Absent
8	Alam Zeb	Zarawar Khan	GGHS Chaper	NQ	Failed
9	Khurshid Ali	Shreen Zada	GHSS Sundal	NQ	Absent
10	Noor Uddin	Nadar Khan	GGHS Jabbar	N-Q	Absent
11	Shaf ulah	Muharam Khan	GGCMS Sahib Abad	Chowkidar	Absent
12	Borhan Uddin	Muhammad Dyan	GGPS Bandai	Chowkidar	Absent
13	Azmat Ullah	InayatUllah	O/O SDEO(F) Dir	NQ	Successful
14	Attaullah	Suliman	DEO (F)	N/Q	Successful
15	Israr Ahmad	Jamroz Khan	GGPS berari	Chowkidar	Absent
16	Walayat Khan	Khan Badshah	GGPS Zako	Chowkidar	Absent
17	Bakht Bedar	Syed Mukhtyar Jan	GGPS Surbat Payeen	Chowkidar	Absent
18	Khalid Ullah	Muhammad Borhan	GGCMS Mula Paw	Chowkidar	Absent
19	Rahim Ullah	Badshah Rawan	GGMS Kattan (P)	N-O	Absent
20	Rahimullah	Ali Rahman	GGPS Peryano Gat	Chowkidar	Absent
21	Jamil ur Rahman	Inayat ur Rahman	GGPS Shahikot	Chowkidar	Absent
22	Amjad Ali	Said Ali Shah	GGPS Lakaro Chinarano	Chowkidar	Absent

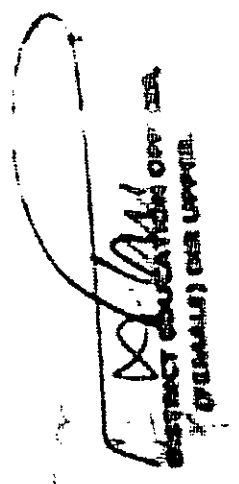
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 District Education Officer
 Female Upper Dir

Muhammad Nisar	GGPS Debanda	Chowkidar	Fails - 2 Rows
Hamid Gul	Payeen	NQ	ABSENT
Amna Bibi	GGHSS Wari Bala	LAI	ABSENT
Moyatu Rehman	GGHSS Wari Bala	CH	ABSENT
Zahan Khan	GGHS Sheringal	Ch	ABSENT
Ferman Ullah	GGHS Abgram	NQ	ABSENT
Gawhar Rehman	GGHS Panatot	NQ	ABSENT
Azmat Khan	GGHS Shahkot	NQ	ABSENT
Budshah Rahman	O/O DEO(F) Dir	Daftri	Fails - 12 mat
Muhammad Rahim	O/O DEO(F) Dir	Behishti	Successful
Nisar Khan	GGHS Bialwar	Ch	ABSENT
Shafi Ullah	GGHS Gogjal	Ch	ABSENT
Abdur Rahman	GGHS Gandigar	CH	ABSENT
Samiullah	GGPS Bandal	Chowkidar	ABSENT
Shafi Ullah	O/O DEO(F) Dir	NQ	Fails
Nasir Ahmad	GGMS Badatal	N-Q	ABSENT
Sulman Farid	GGHS Wari Payeen	LAI	ABSENT
Halim Gul	GGHS Wari Payeen	Chow.	ABSENT
Sajid Iqbal	GGHSS Wari Bala	sweeper	ABSENT
Sohail Ahmad	GGHSS Gandigar	NQ	ABSENT
Sajjad Ali	GGPS Mina Dooq	Chowkidar	ABSENT
Shah Faisal	GGPS All Gaser	Chowkidar	ABSENT
Imran Khan	O/O SDEO Larjam	NQ	ABSENT
Arslan Khan	GGPS Kass Dir	Chowkidar	ABSENT
Uabidullah	GGMS Abgram	NQ	ABSENT
Saif Ullah	GGHSS Dir	LAI	ABSENT
	O/O DEO(F) Dir	NQ	Fails

- Semi ulleh


 District Education Officer
 Female Upper Dir


 DISTRICT EDUCATION OFFICER
 FEMALE UPPER DIR

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District Education Officer
Female Upper Dir.

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District Education Officer
Female Dir Upper

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Once upon a time there was a boy, he was very hungry, he went here and there in search of food. At

Attendant s/o subman

Typing assistant Junior Clerk

ATTACHED

District Education Officer
Female Or Upper

District Education Officer
Female Upper Du

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Handwritten signature

Once upon a time there was a dog. He was very hungry. He went here and there in search of food. At last he went to a

Azmatullah s/o Mayadullah

Typing Inceptor Junior Clerk

Typing test for junior clerk

BADSHAH RAHMAN s/o HABIBUR AHMAN

Once upon a time there was a dog. He was very hungry. He went here and there in search of food. At last he went to a

copy of

succeeded

C. S. S. S. S.

J. W. S. S. S.

District Education Officer
Female Upper Div.

[Signature]
District Education Officer
Female Upper Div.

~~ATTACHED~~



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



PH No. 0944-881900

E-mail deofdirupper@gmail.com

OFFICE ORDER

Consequent upon, their selection by the Departmental Selection Committee, the undersigned has been pleased to promote the following in service Class IV (Naib Qasid) as Junior Clerks on regular basis in Elementary & Secondary Education (Female) Department Dir Upper in **BPS-11 (12570-880-38970)** plus usual allowances as admissible under the rules subject to the existing terms and conditions.

S.No.	Name	Father Name	No. of Merit	Schools where posted / adjusted
1	Atta Ullah	Sullman	33% Quota	GGHS Jabbar
2	Azmat Ullah	Inayat Ullah	33% Quota	GGHS Darora

TERMS CONDITIONS.

- The promotees will be on probation for a period of one year in terms of rule 15(1989) of Khyber Pakhtunkhwa civil servants (Appointment, promotion and transfer) rules.
- The promotees will be governed by such rules and regulation/policies as prescribed by the government time to time.
- The promotees will be received all benefits of (BPS-11) under the rules.
- The promotees should take the charge of their new post within a week time positively.
- Charge report should be submitted to all concerned.
- No TA/DA is allowed.

(HABIBA BIBI)
DISTRICT EDUCATION OFFICER,
(FEMALE) DIR UPPER.

Dated 06/12/2019,

No. 4494-98 /F.No.07 /DEO (F)/ADO (S) Estab:

Copy forwarded for information to:-

- The Director Elementary & Secondary Education Government of Khyber Pakhtunkhwa Peshawar.
- The District Accounts Officer Dir Upper.
- The Deputy District Education Officer Female Dir Upper.
- The Head Mistress GGHS Jabbar.
- The Head Mistress GGHS Darora.
- The promotees / officials concerned.

[Signature]
District Education Officer
Female Upper Dir

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

ATTESTED

6-26

OFFICE OF THE DISTRICT EDNUCATION OFFICER FEMALE DIR UPPER.

P.H 0944 881900 FAX 0944880411 EMAIL,dmisdirupper@gmail.com.

OFFICE ORDER

Consequent upon, his selection by the Departmental Selection Committee, the undersigned has been pleased to promote the following in service candidate as **Junior Clerks** on regular basis in Elementary & Secondary Education (Female) Department Dir Upper in **BPS-11 (12570-880-38970)** plus usual allowances as admissible under the rules subject to the existing terms and conditions.

S.No.	Name	F/Name	No. of Merit	Schools where posted / adjusted
1	Badshah Rahman	Habibur Rahman	33% Quota	GGHS Janbhatti

TERMS CONDITIONS.

- 1- The promote will be on probation for a period of one year in terms of rule 15(1989. Of Khyber Pakhtunkhwa civil servants (Appointment, promotion and transfer) rules.
- 2- The promote will be governed by such rules and regulation/policies as prescribed by the government time to time.
- 3- The promote will be received all benefits of (BPS-11) under the rules.
- 4- The promote should take the charge of their new post within a week time positively.
- 5- Charge report should be submitted to all concerned.
- 6- No TA/DA is allowed.

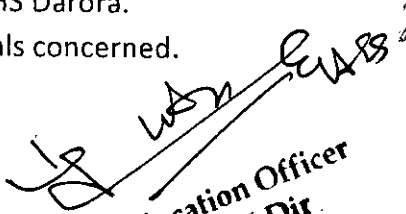
(HABIBA BIBI)
DISTRICT EDUCATION OFFICER,
(FEMALE) DIR UPPER.

No. 97-102. /F.No.07 /DEO (F)/ADO (S) Estab:

Dated 02/01/2020.

Copy forwarded for information to:-

7. The Director Elementary & Secondary Education Government of Khyber Pakhtunkhwa Peshawar.
8. The District Accounts Officer Dir Upper.
9. The Deputy District Education Officer Female Dir Upper.
10. The Head Mistress GGHS Jabbar.
11. The Head Mistress GGHS Darora.
12. The promotees / officials concerned.


District Education Officer
Female Dir Upper

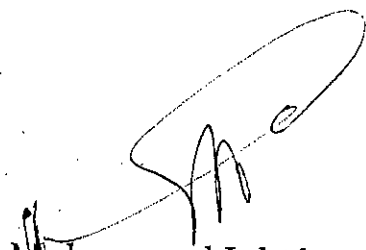

DISTRICT EDUCATION OFFICER,
(FEMALE) DIR UPPER.

ATTESTED

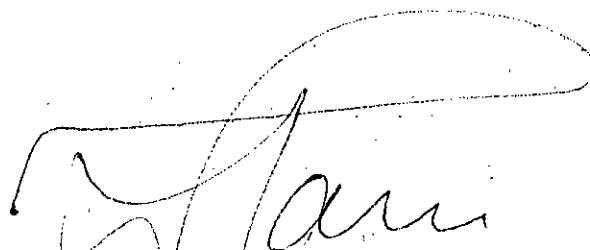
nor he participate in the Test, Interview. Moreover he does not file any appeal proper forum i.e DEO (F) Office Dir Upper and his case is also time bared. (copy of Service book of appellant is attached is annexure E)

6. That the inquiry Officer conducted the inquiry in the absence of Promotion committee as well as ignored their view points and thus the inquiry is totally one sided, hence not tenable in the eyes of law.


Therefore, it is requested that kindly withdraw the show cause notice without any further legal action in the light of the above facts please.



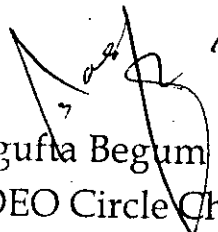
Muhammad Iqbal
Ex-ADEO P & D
DEO(F) Dir Upper



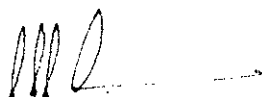
Mst Habiba Bibi
Ex- District Education Officer
DEO (F) Dir Upper



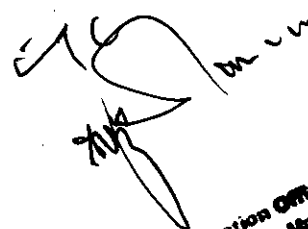
Alamzeb Khan
Ex-B&AO
DEO(F) Dir Upper



Shagufta Begum
ASDEO Circle Chukiatan
Tehsil Dir-Dir Upper



Muhammad Zada Khan
ADEO(M) Primary Estab
Representative of Director E&SE
for promotion of Class IV



District Education Officer
(Upper) District Dir Upper

ATTESTED