

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

Service Appeal No. 2582/2023

Sabir Rahman.....Appellant

VERSUS

Secretary E&SE Khyber Pakhtunkhwa & others.....Respondents

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(Samina Altaf)
DIRECTOR

E&SE Department Khyber
Pakhtunkhwa, Peshawar.

L

17.05.24

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

Service Appeal No. 2582/2023

Sabir Rahman.....Appellant

VERSUS

Secretary E&SE Khyber Pakhtunkhwa & others.....Respondents

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

Respectfully Sheweth :-

The Respondents submit as under: -

**Khyber Pakhtunkhwa
Service Tribunal**

Diary No. 12723

Dated 13-05-24

PRELIMINARY OBJECTIONS

- 1 That the appellant has got no cause of action/locus standi to file instant appeal before this Honorable Tribunal.
- 2 That the appellant is not an aggrieved person within the meaning of Section-4 Khyber Pakhtunkhwa Service Tribunal Act 1974 read with Article-212 of the constitution of Islamic Republic of Pakistan 1973.
- 3 That the appellant has concealed material facts from the ambit of this Honorable Tribunal in the titled appeal.
- 4 That the appellant has not come to this Honorable Tribunal with clean hands.
- 5 That the appeal in hand is based on mala fide intentions for gaining illegal service benefits from the Department for the grant of promotion to the post of STT in BS-16 TC in violation of the rules & Policy.
- 6 That the appeal in hand is barred by law and limitation.
- 7 That the appeal in hand is bad for mis-joinder and non-joinder of the necessary parties.
- 8 That the appeal is not maintainable & even incompetent in the eyes of Law, Rules & Policy.
- 9 That the Notification dated 12-06-2023 is legally competent & liable to be maintained in favor of the Department of being the result of due process of Law, Rules in vogue.
- 10 That the appellant is not entitled for the grant of promotion w.e.f 20-02-2013 & has correctly promoted to the post of STT in BPS-16 vide Notification dated 12-06-2023 as per Law, Rules & Policy.

ON FACTS

- 1) **That** Para-1 is correct to the extent of the Notification No. (B&A)/1-18/E&SE/2012 dated 11-07-2012, whereby, the Govt. of KP has awarded up gradation at a ratio of 1/3rd of the total posts to different teaching cadres including the TT in BPS-15 to STT in BPS-16 w.e.f 01-07-2012 *attached as Annex-A.*
- 2) **That** Para-2 is incorrect & mis-leading on the grounds as per available record in the custody of the DEO (M) Bajour there were 73 sanctioned/vacant posts of TT (M) in BPS-15 & on the strength of which promotions were made in BPS-16 against the STT (M) post in BPS-16 on regular basis w.e.f 20-02-2013 by excluding the appellant due to the saturation of the sanctioned quota of 73 vacant post in District Bajour.
- 3) **That** Para-3 is correct.
- 4) **That** Para-4 is correct to the extent of the award of promotion to the TTs against the STTs in BPS-16 in view of the recommendation of the DPC meeting held on dated 17-03-2014 by the Department under the Law notified vide Notification dated 23-04-2014.
- 5) **That** Para-5 is incorrect & mis-leading on the grounds that there were 73 vacant posts of STT (M) in BPS-16 during the period of 2017 in District Bajour, whereupon, 73 TTs in BPS-15 were promoted to the post of STTs in BPS-16 vide Notification dated 10-02-2017 w.e.f 20-02-2013, wherein, the appellant was not promoted to the said post due to the observance & saturation of the total sanctioned 73 posts of STT in BPS-16 in District Bajour, therefore, in view of the letter dated 03-10-2014, the promotion order of the appellant dated 23-04-2014 was held in abeyance along with recovery of an amount drawn under the up graded pay mentioned in Para-2 of the Directorate of E&SE order dated 16-10-2014.
(Copies of the letter dated 03-10-2014 & Notification dated 10-02-2017 are Annex-B & C)
- 6) **That** Para-6 is pertains to the record of the SAFRON Division Govt. of Pakistan which is a Federal Body, whereas, the issue in question as agitated by the appellant before this Honorable Tribunal is a Provincial subject.
- 7) **That** Para-7 is correct that vide Notification dated 10-02-2017, whereby, 73 TTs in BPS-15 were promoted/up graded in BPS-16 against the STT (M) BPS-16 post on regular basis w.e.f 20-02-2013 by excluding the appellant in view of the saturation of the total 73 sanctioned posts in District Bajour.
- 8) **That** Para-8 is incorrect on the grounds that the appellant is not an aggrieved person within the meaning of Section-4 Khyber

Pakhtunkhwa Service Tribunal Act 1974 read with Article-212 of the constitution of Islamic Republic of Pakistan 1973, as the act of the Department with regard to the Notifications dated 10-02-2017 & 12-06-2023 is within legal parameter as well as in view of the DPC recommendation.

- 9) **That** Para-9 is correct regarding processing the cases of TTs for their up gradation against the STT in BPS-16 posts for placing them before the DPC which was processed accordingly & resultantly vide Notification dated 12-06-2023, the appellant along with other TTs were up graded to the post of STTs in BPS-16 under the Rules already attached for ready reference.
- 10) **That** Para-10 is also correct to the extent of the Notification dated 12-06-2023, the appellant along with other TTs were up graded to the post of STTs in BPS-16 under the Rules already attached for ready reference.
- 11) **That** Para-11 is correct to the extent of filing an appeal dated 27-09-2023 against the Notification dated 12-06-2023 which is badly time barred under the relevant provision of Law, hence rejected vide order dated 27-09-2023 under the Rules by the Department.
- 12) **That** Para-12 is correct to the extent of rejection of Departmental Appeal dated 27-07-2023 vide order dated 29-07-2023 on merits of the case.
- 13) **That** Para-13 is incorrect as the appellant has got no cause of action to approach this Honorable tribunal in the titled appeal, hence the appeal in hand is liable to be dismissed on the following grounds inter alia: -

ON GROUNDS

- A. ***Incorrect & not admitted.*** The appellant is not entitled for the grant of up gradation in BPS-16 against the STT (M) w.e.f 20-02-2013 & has correctly been up graded w.e.f 12-06-2023 by the Department in view of the available sanctioned posts of STT in District Bajour.
- B. ***Incorrect & not admitted.*** Strongly denied. The appellant has been treated as per Law & Rules by the Respondent Department in the titled appeal, wherein, he could not made out his case for up gradation as STT in view of the fore made submissions by the Department in the present reply .
- C. ***Incorrect & not admitted,*** the act of the Department with regard to the Notification dated 12-06-2023 is in accordance with the provision of Articles-4 & 25 of the constitution of 1973.

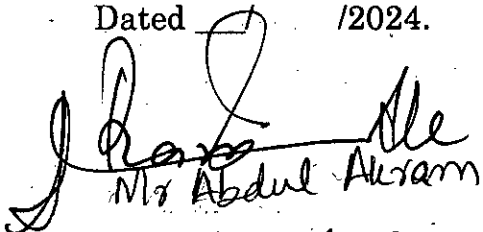
D. Incorrect & not admitted, the act of the Respondents cannot be declared against the law on any ground whatsoever but require straight away rejection of Service Appeal in favor of the Department.

E. Incorrect & not admitted, the plea of the appellant regarding up gradation w.e.f 20-02-2013 instead of 12-06-2023 as STT in BPS-16 is illegal, however, the Respondent Department is also seek leave of this honorable Tribunal to submit additional record, grounds & case law at the time of arguments.

PRAYER.

In view of the above made submissions, it is requested that this Tribunal may very graciously be pleased to dismiss the titled appeal in favor of the Respondent Department in the interest of justice.

Dated 17 /2024.


Mr. Abdul Akram
AS (G) E, SED
on behalf of

(Masood Ahmad)

SECRETARY

E&SE Department Khyber
Pakhtunkhwa, Peshawar.

(Respondent No: 1).


(Samina Altaf)
DIRECTOR

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

2

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

Service Appeal No. 2582/2023

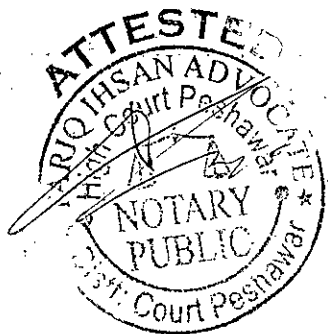
Sabir Rahman.....Appellant


VERSUS

Secretary E&SE Khyber Pakhtunkhwa & others.....Respondents

AFFIDAVIT

I, Samina Altaf Director E&SE 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.




Samina Altaf
DIRECTOR
E&SE Department Khyber
Pakhtunkhwa, Peshawar

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Annexure - A (6)
 15/11/2012



GOVERNMENT OF
 KHYBER PAKHTUNKHWA
 ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Malik Rahman-ud-Din
 General Secretary (MGTA)
 Mutahida Gharar Shamozaal Teachers
 Association Bajaur Agency,
 Cell No-0345-9293852

Dated Peshawar, 11.07.2012

NOTIFICATION

MSO (B&A) / E / 18 / RSE / 2012

Sanction of the Government of Khyber Pakhtunkhwa is hereby accorded to the up gradation of the posts for Grant of Incentive of High Pay Scale to different Categories/Cadres of teachers in Elementary & Secondary Education Department w.e.f. 01-07-2012 as per details given below:-

| Sr. No. | Nomenclature of Teaching Cadre Post | Location | Existing Basic Pay Scale | New Approved Basic Pay Scale | Remarks |
|---------|---|--|--|------------------------------|--|
| 1. | Primary School Teacher (PST) | Govt. Primary School | BPS-5 BPS-6 BPS-7 BPS-9 BPS-10 BPS-12 | (BPS-12) | The post of PST is upgraded to BPS-12. Accordingly, 33,497 posts of PSTs, already sanctioned in various pay scales are upgraded to BPS-12 for the present incumbents as well as future appointees. |
| 2. | Senior Primary School Teacher (Sr. PST) | "do" | Newly Upgraded/ Redesignated Post | (BPS-14) | 22,331 posts of the existing PSTs in various existing pay scales are upgraded to BPS-14 and redesignated as Senior PST. The posts will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post. |
| 3. | Primary School Head Teacher (PSHT) | "do" | Newly Upgraded/ Redesignated Post | (BPS-17) | 20,804 posts of the existing PSTs (one post in each Primary School) are upgraded to BPS-15 and redesignated as Primary School Head Teacher, and will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post. |
| 4. | Certified Teachers (CT) | Govt. Middle/High/Lighter Secondary School | BS-09 BS-10 BS-12 BS-14 BS-15 | (BPS-15) | All the existing posts of CTs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees. |
| 5. | Senior Certified Teachers (Sr. CT) | "do" | Newly Upgraded/ Redesignated Post | (BPS-16) | One thirds (1/3 rd) of the total CT posts are upgraded to BPS-16 and redesignated as Senior CTs which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post. |
| 6. | Arabic Teachers (A.T) | "do" | BS-09 BS-10 BS-12 BS-14 BS-15 | (BPS-15) | All the existing posts of ATs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees. |
| 7. | Senior Arabic Teachers (Sr. AT) | "do" | Newly Upgraded/ Redesignated Post | (BPS-16) | One thirds (1/3 rd) of the total AT posts are upgraded to BPS-16 and redesignated as Senior AT, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post. |
| 8. | Teacher of Theology (TT) | "do" | BS-07 BS-09 BS-10 BS-12 BS-14 BS-15 | (BPS-15) | All the existing posts of TTs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees. |
| 9. | Senior Teacher of Theology (Sr. TT) | "do" | Newly Upgraded/ Redesignated Post | (BPS-16) | One thirds (1/3 rd) of the total TT posts are upgraded to BPS-16 and redesignated as Senior TT, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post. |
| 10. | Drawing Masters (DM) | "do" | BS-09 BS-10 BS-12 BS-14 BS-15 | (BPS-15) | All the existing posts of DMs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees. |
| 11. | Senior Drawing Masters (Sr. DM) | "do" | Newly Upgraded/ Redesignated Post | (BPS-16) | One thirds (1/3 rd) of the total DM's posts are upgraded to BPS-16 and redesignated as Senior DM, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or |

ATTESTED

| | | | | | |
|-----|--|------|--|----------|---|
| | Teachers (PET's) | "do" | BPS-09 BPS-10 BPS-12 BPS-14 BPS-15 | (BPS-15) | All the existing posts of PET's are upgraded to BPS-15 present incumbents to the post as well as future appoint |
| 13. | Senior Physical Education Teachers (Sr. PET's) | "do" | Newly Upgraded/ Redesignated Post | (BPS-16) | One thirds (1/3 rd) of the total PET's posts are upgraded and redesignated as Senior PET, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules amending the existing service rules, if any, for the |
| 14. | Qari/Qaria | "do" | BPS-7 BPS-9 BPS-10 BPS-12 BPS-14 BPS-15 | (BPS-12) | All the existing posts of Qari/Qaria are upgraded to BPS-12 the present incumbents to the post as well as future appoint |
| 15. | Sr. Qari/Sr. Qaria | "do" | Newly Upgraded/ Redesignated Post | (BPS-15) | One thirds (1/3 rd) of the total Qari/Qaria posts are upgraded to BPS-15 and redesignated as Senior Qari/Qaria, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules amending the existing service rules, if any, for the |

2. A policy shall also be devised in the framework of input/output criteria in terms of qualification, length of service, regularity, punctuality, results, curricular and co-curricular achievements and other performance indicators, so that the teachers do not make the scheme for granted but work for it.

3. District wise/ school wise breakup of the posts is enclosed herewith as Annexure-A.

SECRETARY

Order No. SO(FR)/FD/10-22(E)/2010 Dated Pesh: the 16.07.2012
 Copy is forwarded to Accountant General Khyber Pakhtunkhwa, Peshawar.
 All District Account Officers

TESTED

[Handwritten Signature]

Malik Rahman-ud-Din
 General Secretary (MGTA)
 Mutahida Charhar Shomozai Teacher
 Association, Sajaour Agency
 Cell No 0345-9293852

[Handwritten Signature]
 SECTION OFFICER (FR)
 FINANCE DEPARTMENT

Encls. Of even Number & Date:

- Copy of the above is forwarded to:-
1. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department, with reference to his letter No SO(FR)/FD/10-22(E)/2010 dated 26.06.2012.
 2. P.S. to Secretary, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
 3. P.S. to Special Secretary, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
 4. P.S. to Deputy Secretary-II, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
 5. P.S. to Minister of E&SE, Khyber Pakhtunkhwa.
 6. The Director, E&SE Khyber Pakhtunkhwa, Peshawar.
 7. All the Executive District Officers, E&SE Khyber Pakhtunkhwa.
 8. The Managing Director, Printing Press, Khyber Pakhtunkhwa, Peshawar.
 9. Master file.

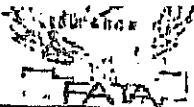
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 (NOOR ALAM KHAN WAZIR)
 SECTION OFFICER (B&A)
 ELEMENTARY & SECONDARY EDUCATION
 DEPARTMENT

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Annexure-B



Annex "F"



| | |
|--------------------------|----|
| NO. _____ | 11 |
| DATED _____ | |
| F-A UP GRADATION VOL 1.7 | |

MOST IMMEDIATE

To All the Agency Education Officers in FATA.

Subject: UP-GRADATION/RECOVERY.

Memo: Consequent upon the approval of the Competent Authority, recovery of the amount drawn under upgraded pay mentioned therein para-2 of this Directorate order No.10322-52 dated 16/4/2014 is hereby held in abeyance till further orders..

Director Education (FATA)

Endst;No. 11056-80 / Dated 3/10 2014.

ATTESTED

Copy to;

- 1 PS to Secretary to Governor Khyber Pakhtunshwa
- 2 PS to Additional Chief Secretary FATA
- 3 PS to Secretary AI&C FATA.
- 4 P.A to Director Education FATA
- 5 All the Agency Accounts Officers of FATA
- 6 Dy. Directress local Directorate

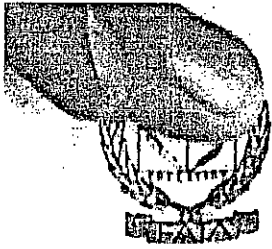
For Additional Director (Estab)

Annexure - C

Annex "H"

(9)

(2)



TT(M)

FATA SECRETARIAT
Directorate of Education

Warsak Road Peshawar, Pakistan
Phone 091 9210166 Fax 091 9210216

No. _____ /
dated _____ / 2017

Notification:

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Govt. of Pakistan Finance Division (Regulation Wing) Notification No.1(32)R-1/2015-502/2010 dated 25.7.2010 Islamabad, SO (Edu) Notification No.FS/50(Edu)/SSD/Up-Gradation/2882-04 dated 22.6.2016 and duly Endorsed by Directorate of Education FATA vide No.8233-60 dated 8.8.2016, the following TT (M) B-15 are hereby promoted to the post of Sr.TT (M) B-16 (Rs.15880-1280-54280) plus usual allowances as admissible under the rules on regular basis on terms and conditions given below with effect from 20.2.2013 and further they will be posted in the Govt. Higher Secondary / High Schools by the Agency Education Officer. concerned against the newly upgraded Sr.TT BPS-16 posts.

| | |
|--|-----|
| Total No. of TT (M) Posts duly verified by the AAO | 220 |
| 1/3 share of Senior TT Posts | 73 |
| Share of promotion 100% | 73 |
| Already promoted to B-16 Sr.TT | Nil |
| No of Senior TT Posts available for promotion | 73 |
| Recommended for promotion to Sr. TT | 73 |

ATTESTED
[Signature]

| S.No | Sen. No | Name of Teacher | Place of posting | Date of Birth | Date of Regular Apptt. against TT Post | Remarks |
|------|---------|-------------------|-------------------|---------------|--|---|
| 1 | 11 | Hidayat ul. Haq | GPS Gang Salarzal | 17-Mar-58 | 17-Oct-81 | Services placed at the disposal of AEO Bajaur for further posting |
| 2 | 52 | Ziaul Haq | GPS Shinkot | 01-Jan-57 | 01-Nov-82 | Services placed at the disposal of AEO Bajaur for further posting |
| 3 | 68 | Ashrafud Din | GHSS Gardai | 20-Apr-60 | 24-Nov-82 | Services placed at the disposal of AEO Bajaur for further posting |
| 4 | 12 | Qazi Gul | GPS Tofan Shah | 17-Sep-56 | 01-Dec-82 | Services placed at the disposal of AEO Bajaur for further posting |
| 5 | 38 | Muhammad Abdullah | GPS Tanai | 02-Mar-64 | 11-Apr-87 | Services placed at the disposal of AEO Bajaur for further posting |
| 6 | 86 | Muhammad Islam | GHS Raghagan | 03-Feb-65 | 01-May-87 | Services placed at the disposal of AEO Bajaur for further posting |
| 7 | 47 | Muhammad Sadiq | GPS Aman Kot | 01-Jul-66 | 11-May-87 | Services placed at the disposal of AEO Bajaur for further posting |
| 8 | 45 | Muhammad Karim | GPS Sewal No 1 | 10-Nov-64 | 16-May-87 | Services placed at the disposal of AEO Bajaur for further posting |

[Signature]
10/2/17

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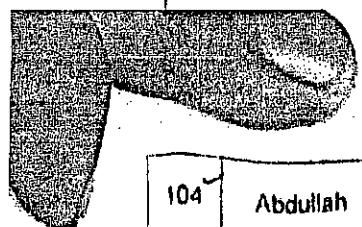
| | | | | | | |
|----|-----|------------------|-------------------------|-----------|-----------|---|
| | 53 | Shah Zamin | GPS Babara No 1 | 11-Apr-07 | 07-Oct-89 | Services placed at the disposal of AEO Bajaur for further posting |
| 10 | 54 | Sher Dad | GHS KHAR | 15-Sep-71 | 10-Oct-89 | Services placed at the disposal of AEO Bajaur for further posting |
| 11 | 66 | Muhammad Younas | GPS Inankhwara Chinagai | 01-Jul-62 | 01-Dec-89 | Services placed at the disposal of AEO Bajaur for further posting |
| 12 | 60 | Inayat Ullah | GPS Goordagai | 06-Aug-57 | 02-Dec-89 | Services placed at the disposal of AEO Bajaur for further posting |
| 13 | 67 | Muhammad Ishaq | GPS Inzari | 12-Apr-56 | 12-Dec-89 | Services placed at the disposal of AEO Bajaur for further posting |
| 14 | 64 | Niaz Muhammad | GPS Mir Ahmad Chena | 28-Dec-64 | 26-Dec-89 | Services placed at the disposal of AEO Bajaur for further posting |
| 15 | 135 | Saeed-ur-Rahman | GHS Zoor Bandar | 04-Mar-59 | 19-May-90 | Services placed at the disposal of AEO Bajaur for further posting |
| 16 | 72 | Muhammad Musa | GPS College Colony | 04-Aug-65 | 04-Aug-90 | Services placed at the disposal of AEO Bajaur for further posting |
| 17 | 73 | Nisarul Haq | GPS Rashakai | 07-Jul-71 | 04-Aug-90 | Services placed at the disposal of AEO Bajaur for further posting |
| 18 | 84 | Muhammad Badshah | GPS Bara Dara | 08-Aug-68 | 07-Aug-90 | Services placed at the disposal of AEO Bajaur for further posting |
| 19 | 75 | Naqeeb Ahmad | GPS China Batwar | 15-Aug-65 | 14-Aug-90 | Services placed at the disposal of AEO Bajaur for further posting |
| 20 | 78 | Jehangir Khan | GPS Bagh Arang | 06-Sep-69 | 11-Sep-90 | Services placed at the disposal of AEO Bajaur for further posting |
| 21 | 80 | Muhammad Farooq | GPS Kalan No 1 | 01-Feb-68 | 11-Oct-90 | Services placed at the disposal of AEO Bajaur for further posting |
| 22 | 82 | Aurang Zeb | GPS Niag | 17-Feb-64 | 20-Dec-90 | Services placed at the disposal of AEO Bajaur for further posting |
| 23 | 87 | Abdul Wadood | GPS Giray | 17-Jun-69 | 16-Mar-93 | Services placed at the disposal of AEO Bajaur for further posting |
| 24 | 90 | Jan Muhammad | GPS Ghundo | 18-Jul-70 | 16-Mar-93 | Services placed at the disposal of AEO Bajaur for further posting |
| 25 | 92 | Lutfur Rahman | GPS Shahi Tangai | 06-May-63 | 06-Jun-94 | Services placed at the disposal of AEO Bajaur for further posting |
| 26 | 97 | Gul shah Zada | GPS Mano | 10-Mar-68 | 26-Sep-94 | Services placed at the disposal of AEO Bajaur for further posting |
| 27 | 99 | Islam Muhammad | GPS Bara Nawagai | 01-Jan-69 | 26-Sep-94 | Services placed at the disposal of AEO Bajaur for further posting |
| 28 | 102 | Fazli Manan Abid | GPS Mano Derai No 2 | 06-Oct-69 | 26-Sep-94 | Services placed at the disposal of AEO Bajaur for further posting |
| 29 | 103 | Azizul Hakim | GPS Manodehrai No.1 | 09-Jun-70 | 26-Sep-94 | Services placed at the disposal of AEO Bajaur for further posting |

APPROVED

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11/2/17

(11)



| | | | | | | |
|----|-----|-----------------------|--------------------|-----------|-----------|---|
| | 104 | Abdullah | GPS Bargandil | 10-May-71 | 26-Sep-94 | Services placed at the disposal of AEO Bajaur for further posting |
| 31 | 105 | Nawsher Khan | GPS Bandagal | 20-Sep-71 | 26-Sep-94 | Services placed at the disposal of AEO Bajaur for further posting |
| 32 | 168 | Bashir Ahmad | GPS Muhram ghundal | 12-Nov-71 | 26-Sep-94 | Services placed at the disposal of AEO Bajaur for further posting |
| 33 | 200 | Said Rasool Khan | GPS Ardu Arang | 08-Jan-73 | 26-Sep-94 | Services placed at the disposal of AEO Bajaur for further posting |
| 34 | 113 | Izzatullah | GPS Gabrai No.1 | 01-Feb-74 | 26-Sep-94 | Services placed at the disposal of AEO Bajaur for further posting |
| 35 | 110 | Muhibullah | GPS Tangi Charmang | 01-Jan-59 | 04-Oct-94 | Services placed at the disposal of AEO Bajaur for further posting |
| 36 | 112 | Din Muhammad | GPS Batmalal No 1 | 05-Feb-70 | 01-Mar-95 | Services placed at the disposal of AEO Bajaur for further posting |
| 37 | 115 | Muhammad Idrees | GHS Dehrakai | 01-Apr-68 | 01-Oct-95 | Services placed at the disposal of AEO Bajaur for further posting |
| 38 | 116 | Fazal Wahid | GPS Kassai | 10-Jun-70 | 01-Oct-95 | Services placed at the disposal of AEO Bajaur for further posting |
| 39 | 144 | Rashid Ahmad | GPS Alimano | 25-Dec-75 | 01-Oct-95 | Services placed at the disposal of AEO Bajaur for further posting |
| 40 | 119 | Roohullah | GPS Almazo | 10-Oct-76 | 01-Oct-95 | Services placed at the disposal of AEO Bajaur for further posting |
| 41 | 121 | Khaista Rahman | GPS Khair Abad | 01-Jan-72 | 19-Oct-95 | Services placed at the disposal of AEO Bajaur for further posting |
| 42 | 122 | Abdur Rahman | GPS Zarai | 15-Mar-71 | 19-Nov-95 | Services placed at the disposal of AEO Bajaur for further posting |
| 43 | 124 | Matiullah | GPS Khuna | 01-Apr-71 | 02-Dec-95 | Services placed at the disposal of AEO Bajaur for further posting |
| 44 | 128 | Mir Agha Jan | GPS Bagh Arang | 16-Jan-71 | 02-Mar-96 | Services placed at the disposal of AEO Bajaur for further posting |
| 45 | 129 | Gul Nazir | GHS Kotki Charmang | 25-Dec-71 | 02-Mar-96 | Services placed at the disposal of AEO Bajaur for further posting |
| 46 | 131 | Muhammad sardar | GPS Ghakhey | 01-Jan-74 | 02-Mar-96 | Services placed at the disposal of AEO Bajaur for further posting |
| 47 | 134 | Muhammad Hasham | GPS China Balwar | 10-Jan-73 | 23-Sep-96 | Services placed at the disposal of AEO Bajaur for further posting |
| 48 | 153 | Muhammad Ubaid ul Haq | GPS Umarai Ghundai | 01-Dec-73 | 28-Feb-99 | Services placed at the disposal of AEO Bajaur for further posting |
| 49 | 175 | Nazir Ahmad | GPS Ghakhal No2 | 10-Apr-75 | 01-Mar-00 | Services placed at the disposal of AEO Bajaur for further posting |
| 50 | 138 | Muhibullah | GPS Kausar | 20-Oct-79 | 29-Apr-00 | Services placed at the disposal of AEO Bajaur for further posting |

TESTED
[Signature]

"correct" 10/2/17



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|----|-----|-------------------|--------------------------|-----------|-----------|--|
| 51 | 139 | Muhammad Tayyab | GHS Bandagal | 28-Jul-72 | 01-May-00 | Services placed at the disposal AEO Bajaur for further posting |
| 52 | 140 | Sadiqullah | GPS Shinkotal | 15-Oct-78 | 01-May-00 | Services placed at the disposal AEO Bajaur for further posting |
| 53 | 142 | Ilyas Khan | GPS Ghakhal | 01-Jun-78 | 01-May-00 | Services placed at the disposal AEO Bajaur for further posting |
| 54 | 143 | Ghulamullah | GMS Hayatal | 10-May-75 | 02-May-00 | Services placed at the disposal AEO Bajaur for further posting |
| 55 | 166 | Sher Muhammad | GPS Smasal | 07-Nov-78 | 02-May-00 | Services placed at the disposal AEO Bajaur for further posting |
| 56 | 164 | Gulistan | GPS Inayat Killi | 12-Aug-72 | 01-Jun-01 | Services placed at the disposal AEO Bajaur for further posting |
| 57 | 197 | Islahuddin | GPS Saramin Aslo Targhaw | 12-Dec-81 | 01-Jun-01 | Services placed at the disposal AEO Bajaur for further posting |
| 58 | 146 | Hazrat Gul | GPS Ghani Adal | 03-Jan-74 | 02-Jun-01 | Services placed at the disposal AEO Bajaur for further posting |
| 59 | 182 | Taj Muhammad | GPS Shah Khanai | 13-Jun-76 | 02-Jun-01 | Services placed at the disposal AEO Bajaur for further posting |
| 60 | 185 | Muhammad Hakim | GPS Damano | 20-Dec-70 | 25-Jun-01 | Services placed at the disposal AEO Bajaur for further posting |
| 61 | 148 | Khaista Gul | GPS Sheikh Baba | 12-Jan-72 | 01-Aug-01 | Services placed at the disposal AEO Bajaur for further posting |
| 62 | 174 | Jan Muhammad | GPS Tangkhta | 04-Jun-80 | 25-Aug-01 | Services placed at the disposal AEO Bajaur for further posting |
| 63 | 152 | Ihsanullah | GPS Dara Banda | 01-Jun-73 | 13-Nov-01 | Services placed at the disposal AEO Bajaur for further posting |
| 64 | 178 | Arifullah | GPS Dag Qilla Ali Jan | 03-Aug-79 | 10-Apr-02 | Services placed at the disposal AEO Bajaur for further posting |
| 65 | 155 | Fazal Haleem | GHS Pashal | 20-Jun-72 | 26-Aug-02 | Services placed at the disposal AEO Bajaur for further posting |
| 66 | 183 | Abdul Hakim | GPS Sheikh Killi Pul | 14-Dec-72 | 26-Aug-02 | Services placed at the disposal AEO Bajaur for further posting |
| 67 | 156 | Hazrat Nabi | GPS Wara Kharkai | 05-Feb-74 | 26-Aug-02 | Services placed at the disposal AEO Bajaur for further posting |
| 68 | 186 | Masihullah | GPS Trus kalli | 15-Nov-81 | 26-Aug-02 | Services placed at the disposal AEO Bajaur for further posting |
| 69 | 165 | Niamat Khan | GPS Fajigram | 01-Apr-77 | 23-Dec-02 | Services placed at the disposal AEO Bajaur for further posting |
| 70 | 159 | Badam Gul | GPS Tangi No3 | 01-Jul-78 | 26-Feb-03 | Services placed at the disposal AEO Bajaur for further posting |
| 71 | 177 | Sher Bahadar Khan | GPS Maminzo | 01-Nov-76 | 01-Sep-03 | Services placed at the disposal AEO Bajaur for further posting |

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Handwritten date: 10/2/17

(13)



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|----|-----|-------------------|----------------|-----------|-----------|---|
| 72 | 189 | Muhammad Yar Khan | GPS Dowawo | 20-Apr-79 | 01-Sep-03 | Services placed at the disposal of AEO Bajaur for further posting |
| 73 | 163 | Shah Khalid | GHS Tang Khala | 3.6.1979 | 1.11.2003 | Services placed at the disposal of AEO Bajaur for further posting |

Terms & Conditions:

1. They would be on probation for a period of one year, extendible for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. Their services can be terminated at any time in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be proceeded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their Inter-Se-Seniority on the lower post will remain intact.
6. No TA/DA is allowed for joining him/her duty.
7. They will give an undertaking to be recorded in their Service Book to the effect that any over payment is made to him in the light this order will be recovered and if he is wrongly promoted, he will be reversed.

Stamp: FATA
Signature: J. O. S.

(Hashim Khan)
Director Education FATA

Endst: No. 1958-2045 / File No. 1/Promotion Senior CT B-16 dated 10/12/2017

Copy for information and necessary action is forwarded to the:

1. Accountant General (PR) Sub Office, Peshawar.
2. Agency Education Officer, Bajaur Agency at Khar.
3. Agency Accounts Officer, Bajaur Agency.
4. PS to Additional Chief Secretary FATA.
5. PS to Secretary SSD, FATA.
6. PS to Secretary Finance FATA Secretariat.
7. PA Director Education, local Directorate.
8. Official concerned.
9. Master File.

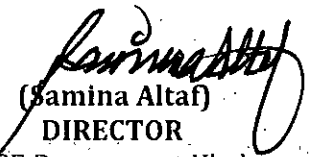
11
Addl: Director (Estab)
Directorate of Education, FATA
10/21/17



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

AUTHORITY LETTER

I, Samina Altaf, Director (E&SE) Khyber Pakhtunkhwa Peshawar do hereby authorized Mr. Muhammad Rizwan, Assistant Director Litigation-II of this Directorate for submission of Joint Parawise Comments in **Service Appeal No. 2577 to 2584/2023** case titled **Rehman Ud Din & (7) others Vs Government of Khyber Pakhtunkhwa & others**, hence, an authority letter is hereby issued in favor of the above-named officer.


(Samina Altaf)
DIRECTOR
E&SE Department Khyber
Pakhtunkhwa, Peshawar

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