

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

Service Appeal No. 2583/2023

Dawood Khan.....Appellant

VERSUS

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

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(Samina Altaf)
DIRECTOR

E&SE Department Khyber
Pakhtunkhwa, Peshawar.

2

17-05-24

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

Service Appeal No. 2583/2023

Dawood Khan.....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. 12724

Dated 13-05-2024

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 2013 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.

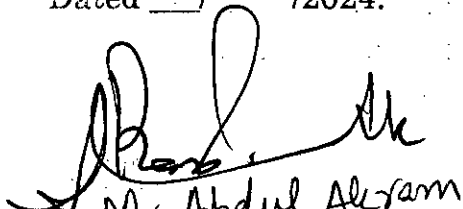
D. Incorrect & not admitted, the act of the Respondents cannot be declared against the law on any ground whatsoever but require straight away rejection of Service Appeal in favor of the Department.

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 ___/___/2024.


Mr Abdul Akram
E S (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).

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

Service Appeal No. 2583/2023

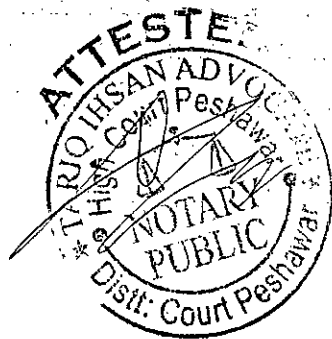
Dawood Khan.....Appellant

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
(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 Ghannam Shamozaal Teacher
 Association Bajaur Agency.
 Cell No-0345-9293852

Dated: Peshawar, 11.07.2012

NOTIFICATION:

M/SO (B & A) / 18 / 18 / S / 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 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-15)	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/Higher 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 third (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 third (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 Technology (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 Technology (Sr. TT)	"do"	Newly Upgraded/ Redesignated Post	(BPS-16)	One third (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 third (1/3 rd) of the total DM 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

TESTED
 [Signature]

	Teachers (PET's)	"do"	BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of PET's are upgraded to BPS-15 present incumbents to the post as well as for the 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 to BPS-16 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 or amending the existing service rules, if any, for the post.
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 or amending the existing service rules, if any, for the post.

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

Encls: 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

ATTACHED

Malik Rahman-ud-Din
 General Secretary (MGTA)
 Mutahida Gharhar Shomozai Teacher
 Association Bajaur Agency.
 Cell No 0345-9293852

F. A. Q.
 SECTION OFFICER (FR)
 FINANCE DEPARTMENT

[Handwritten Signature]

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.

[Handwritten Signature]
 (NOOR ALAM KHAN WAZIR)
 SECTION OFFICER (B&A)
 ELEMENTARY & SECONDARY EDUCATION
 DEPARTMENT

8

Annexure-B



Annex "F"



Address

NO. _____
DATED _____
F-A UP GRADATION VOL 1.2

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)

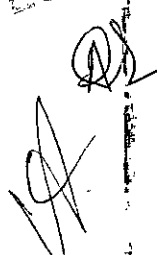
Endst; No. 11056-80 / Dated 3/10 2014.

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 in FATA
- 6 Dy. Directress local Directorate

for 
Additional Director (Estab)

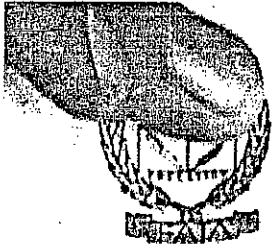
ATTESTED



Annexure - C

Annex "H"

(9)



TT(M)

FATA SECRETARIAT
Directorate of Education

Wazirabad 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-1/2015-582/2010 dated 25.7.2016 Islamabad, SO (Edu) Notification No.FS/SO(Edu)/SSD/Up-Gradation/2882-84 dated 22.6.2016 and duly Endorsed by Directorate of Education FATA vide No.8233-80 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 Appnt. 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 Sewai No 1	10-Nov-64	16-May-87	Services placed at the disposal of AEO Bajaur for further posting

(Signature)
10/7/17

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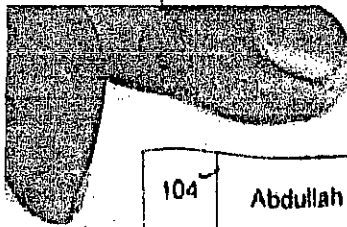
	53	Shah Zamin	GPS Babara No 1	11-Apr-67	07-Oct-89	Services placed at the disposal of AEO Bajaur for further posting
10	54	Sher Dad	GHS Kha	15-Sep-71	10-Oct-89	Services placed at the disposal of AEO Bajaur for further posting
11	66	Muhammad Younas	GPS Inankhware Chinagai	01-Jul-62	01-Dec-89	Services placed at the disposal of AEO Bajaur for further posting
12	60	Inayat Ullah	GPS Soordagai	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 Glray	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 Deral 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

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	104	Abdullah	GPS Bargandil	10-May-71	20-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 Gabral 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 Batwar	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

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51	139	Muhammad Tayyeb	GHS Bandagal	25-Jul-72	01-May-00	Services placed at the disposal AEO Bajaur for further posting
52	140	Sadiqullah	GPS Shinkotal	15-Oct-76	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 Ghanl Adal	03-Jan-74	02-Jun-01	Services placed at the disposal AEO Bajaur for further posting
59	182	Taj Muhamad	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 Pashat	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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10/2/17

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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 Khata	3.0.1979	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.

APPROVED

[Handwritten signature]

(Hashim Khan)
Director Education FATA

Endst: No. 1958-2045 / File No. 1/Promotion Senior CT B-16 dated 10/2/2017

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.

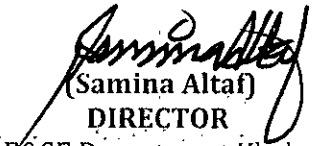
[Handwritten signature]
Addl: Director (Estab)
Directorate of Education, FATA



**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