## BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

### Execution Petition No. 265/2024 In Service Appeal # 7869/2021

Mr. Said Muhammad.....Appellant.

#### VERSUS

Govt: of Khyber Pakhtunkhwa & others......Respondents.

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Deponent

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#### BEFORE THE KHYBER PAKHTUNKHWA SERVIČE TRIBUNAL, PESHAWAR.

Execution Petition No. 265/2024 in Service Appeal No. 7869/2021

Mr. Said Muhammad	Appellan	t.
	Knyber Pakhtukinga Service Tribunal	

VERSUS

Diary No. 12618 Dated 08-05-2024

## **REPLY OF EXECUTION PETITION ON BEHALF OF RESPONDENTS NO. 01 & 02.**

- 1. The instant Execution Petition is pending under adjudication before the Khyber Pakhtunkhwa Service Tribunal.
- 2. That the Honorable Service Tribunal vide Ordersheet dated 03-04-2024 directed Respondents to submit Implementation Report on 26-04-2024.
- 3. That the Service Appeal No.7869/2021 vide order dated 12.04.2023 disposed of the Service Appeal in the following terms:-

"Learned counsel for the appellant submits that after passage of impugned order of transfer another order was made on 17.02.2023 which was withdrawn vide Notification dated 03.03.2023 and consequent upon the same the appellant would be said to be on the post from where he was transferred vide the impugned order. This being so when he was confronted and as to what would be determined by the tribunal in this appeal, he was fair and frank enough to say that it has rendered fruitless."

4. The then Advisor to Chief Minister E&SE restored the Notification dated 03.03.2023 till the completion of his normal tenure. (Annex-I) .The petitioner/applicant had already completed 02-years normal tenure on the post of Deputy District Education Officer (Male) District North Waziristan as envisaged in Khyber Pakhtunkhwa Posting/Tenure Policy.

S#	From	То	Tenure	Annexures
1	12-03-2021	25-11-2021	08 Months	II
2	25-02-2022	17-02-2023	12 Months	III
3	03-03-2023	03-05-2023	02 Months	IV
4	18-08-2023	Not complied		V

- 5. Moreover, inquiry has been finalized wherein the applicant has been declared guilty by issuing appointment orders of 143 class-IV against 121 posts decide the fact that he did not have the power appointing authority. (Annex-VI)
- 6. That it is pertinent to mention here that the petitioner has deliberately concealed the facts from the Honorable Tribunal as he has been drawing his monthly salary from the school despite the fact that he does not perform duties there. (Copy of the Pay Slips of the petitioner for the months of August 2023 to Feb, 2024 Annex-VII).
- 7. That the applicant belongs from Teaching Cadre and seeking posting against the Management Cadre Posts (Deputy District Education Officer post). The issued had already been addressed by the Honorable Peshawar High Court vide Judgment dated 18.11.2009 in W.P No.2937/2009 in the following terms:-

"As the Provincial Government has taken a firm decisions that all those teachers belonging to teaching cadre shall be posted in the Education Institution to teach the students according to their qualification while those belonging to administrative cadre shall only hold the posts retaining administration. Therefore, the petitioners must deliver according to policy of the Government and because they are highly qualified teachers, it is not befitting to hold administrative posts, because they are getting benefits, but the students are suffering thus, they shall go their respective places, where they are required to do the job"

#### Prayer:-

It is therefore, most humbly prayed that the instant Execution Petition may kindly be dismissed summarily throughout cost.

(Mr.Abdul Akram) Additional Secretary (G), E&SED On behalf of (Mr.Masood Ahmad) Secretary, E&SED (Respondent Nos. 0 1 & 02)

## **BEFORE THE HON'BLE SERVICE TRIBUNAL PESHAWAR**

Execution Petition No. 265/2024 in Service Appeal # 7869/2021

Mr. Said Muhammad..... Appellant

#### VERSUS

Govt. of Khyber Pakhtunkhwa & others......Respondents

#### AFFIDAVIT

I, Abdul Akram, Additional Secretary (General), Elementary & Secondary Education, Department do herby solemnly affirm and declare that the contents of the accompanying para-wise comments, submitted by the respondents, are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

It is further, stated on oath that in this appeal the answering Respondents have neither been placed ex-parte nor has their defense been struck off.



Authorizéd Officer (Abdul Akram) Additional Secretary (General) E&SE Department (Masood Ahmad) SECRETARY E&SED (Respondent No. 01 & 02)



## GOVERNMENT OF KHYBER PAKHTUNKHWA ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Block "A" Civil Secretariat, Peshawar

Phone No. 091-9211128

#### **AUTHORITY LETTER**

It is certified that Mr. Sajid Ullah, Section Officer (Litigation-II) Elementary & Secondary Education Department, Government of Khyber Pakhtunkhwa, Peshawar is hereby authorized to submit parawise comments on behalf of Secretary Elementary & Secondary Education Department Peshawar Execution Petition No. 265/2024 in Service Appeal # 7869/2021 Case Titled Mr. Said Muhammad vs Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar.

Authorized Office

(Abdul Akram) Additional Secretary (General) E&SE Department (Masood Ahmad) SECRETARY E&SED (Respondent No. 01 & 02) Dated Peshawar the March 12, 2021

#### NOTIFICATION

<u>NO.SO(SM)E&SED/7-1/2020/Postin r/Transfer/MC:-</u> Posting/transfer of the following officers of Elementary & Secondary Education is hereby ordered as mentioned against each, in the best sublic interest, with immediate effect:

S#	Name, designation & present place of duty	Posted as	Remarks
	Mr. Aurangzeb BS-17 (MC) SDEO (M) Bisham, Shangla	Deputy DEO (M) BS-18 Swat in OPS	AVP
-	Raja Jehangir SDEO (Male) Abbottabad, (MC BS+17).	DDEO (Male) BS-18 Mansehra in OPS	AVP
3.	Mr. Raees Ur Reliman SDEO (MC BS-17) SDEO (Male) Judba Torghar	DDEO (M) Torghar BS- 18 in OPS.	AVP
	Mr. Said Muhammad SS H/Civics (BS-17) GHSS Sarobi Gariti Orakzai (TC BS-17)	DDEO (M) Miranshah North Waziristan TD BS- 18 in OPS	AVP
5.	Mr. All Haider SDEO (BS-17) MC SDEO (M) Timergara Dir Lower	DDEO (M) BS-18 Dir Lower in OPS.	AVP
6.	Mr. Mehboob Elahi SDEO (BS- 17) MC SDEO (M) Chitral Lowe	DDEO (M) BS-18 Chitral Lower In OPS	AVP
7.	Muhammad Zubair, BS-17, (MC) Deputy DEO (M) Charsadda in OPS	Deputy DEO (M) BS-18 Mohmand TD in OPS	AVP
8.	Mr. Abdul Haleem BS-16 (MC) ASDEO, O/O DEO (M), Shangla	SDEO (M) BS-17 Bisham, Shangta in OPS	V.S#1
9.	Muhammad Zahid BS-17 (MC) Assistant Director . Directorate of E&SE,KP	SDEO (M) BS-17 Kubal Swat	AVP
10.	Mr. Saleh Badshah ASDEO BS-16 (MC) ASDEO (M) Serai Naurang Lakki Marwat	Assistant Director (BS-17 , Directorate of E&SE,KI	
		1	04.02.2021

S. Office Work 202 (Notification or Order 2021 Management Cadre Notifications-2021, doex

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Section Officer (Managyment Cadre) Elementary & Secondar) Edu: Deptit Gove of Kingder Pokintumkinga

## NTIDER PAKHTUNKHWA ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar

## NOTIFICATION

Dated Peshawar the November, 25 2021

NO.SO(SM)E&SED/7-1/2021/PT/G/NIC : The Competent Authority is pleased to order the transfer of the following Officers of Elementary & Secondary Education Department, in the best public interest, with immediate effect:-

S#	Name & Designation	From	То
1.		ADEO (P&D o/o DEO (Male) North Waziristan.	disposal of Directorate of E&SE Peshawar. Services placed at the disposal of Directorate of E&SE Peshawar.
3.	Mr. Ihsan Ullah TC (BS-16)	ADEO o/o ol DEO (Male) Nort Waziristan	Services placed at disposal of Directorate E&SE Peshawar.

## SECRETARY TO GOVT OF KHYBER PAKHTUNKHW, E&SE DEPARTMENT

THAKEEZ

# Endst: of even No. & Date

1. Accountant General, Khyber Pakhtunkhwa Peshawar.

- 2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
- 3. District Education Officer (Male) North Waziristan. District Account Officers, North Waziristan.
- Director, EMIS E&SE Department.
- 6. PS to Minister for E&SE Department.
- 7, PS to Secretary E&SE Department: 8. PA to Deputy Secretary (Admn) E&SE Dopartment.
- 9. Officers concerned.
- 10. Office order file. oure

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UR REI AN SHAH)

Section Officer (Manag)ment Cadre) Elementary & Secondary Edu: Deptt Contract of Kinglet Pakillutkinwa

# GOVERNMENT OF KHYBER PAKHTUNKHWA ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar Phone No. 091-9221528

Dated Peshawar the February 25th, 2022

NO. SO(MC)E&SED/4-16/POSTING/TRANSFER/TC: This Department's Notification No.SO(SM)E&SED/7-1/2021/PT/G/MC dated 25-11-2021 to the posting/transfer of Mr. Said Muhammad, Subject Specialist (BS-17) Deputy DEO (Male) North Waziristan (OPS), is hereby held in abeyance/suspended in light of the Khyber Pakhtunkhwa Service Tribunal Order Sheet dated 23-12-2021 in Service Appeal No. 7869/2021.

\*\*\*\*\*

## SECRETARY TO THE GOVT: OF KHYBER PAKHTUNKHWA E&SE DEPARTMENT

## Endst: of even No.& date:

Copy forwarded for information to the: -

- Registrar Khyber Pakhtunkhwa Service Tribunal, Peshawar.
- Accountant General, Khyber Pakhtunkhwa, Peshawar. 1.
- 3. Director, E&SE Khyber Pakhtunkhwa, Peshawar. District Education Officer (Male) North Waziristan. Director EMIS, E&SE Department with the request to upload the same on
  - - the official website of the department.
  - District Accounts Officer North Waziristan. Section Officer (Litigation-II) E&SE Department with the direction to pursue the case in KP Service Tribunal Peshawar till final decision. 6. 7.
    - PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
  - 8.
  - Officer concerned. 9. Master file.

10.

JUNAID SHAH SECTION OFFICER (Management Cadre)

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## GOVERNMENT OF KHYBER PAKHTUNKHWA ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Dated: 3rd March, 2023

NOTIFICATION NO.SO(MC)E&SED/4-16/2023/Posting/Transfer/MC/: In compliance to Khyber Pakhtunkhwa Service Tribunal Peshawar Order in connection with Service Appeal No. 7869/2021, the Notification NO.SO(MC)E&SED/2-3/2022/Promotion /MC (BS17to18) ACB dated 17.02.2023, to the extent of Sr.No. 19 is hereby withdrawn/cancelled abinitio, in the best public interest, till further order.

2- Consequent upon above, the services of Mr. Dilawar Khan, Sr.No.5 under transferred to Deputy DEO (Male) North Waziristan is hereby placed at the disposal of Directorate of E&SE for further posting.

## SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA E&SE DEPARTMENT

#### Endst: of even No.& date:

Copy forwarded for information to the: -

- 1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
- 2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
- 3. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
- 4. Section Officer (Lit-II) E&SE Department.
- 5. District Education Officer (Male) North Waziristan.
- 6. District Accounts Officer North Waziristan.
- 7. PS to Advisor to Chief Minister for E&SE Khyber Pakhtunkhwa.
- 8. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
- 9. Master file.

(IMRAN ZAMAN) SECTION OFFICER (Management Cadre)

Section Officer (Management Cadre) Elementary & Secondary Edu: Deptt: Govt: of Khyber Pakhtunkhwa



#### GOVERNMENT OF KHYBER PAKHTUNKHWA ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Dated: 17th February, 2023

## NOTIFICATION

NO.SO(MC)E&SED/2-3/2022/Promotion/MC(BS17to18)ACB: In pursuance of this Department's Notification of even number dated 12.12.2022, and subsequent approval from the Liection Commission of Pakistan vide their letter No. F.3(1)/2023-Eis dated 10.02.2023, the following posting/ndjustment of officers of the Management Cadre are hereby ordered, in the public interest, with immediate effect:-

	Name of Officer	From	To	Remarks
المیم ۱۰۰	Aana-ar-Rohman	SDEO (M) Hasanzai Torghar	Deputy DEO (Male) Baltagram	Vice S.No. 22
2	Luqman Haqim	SDEO(M) Kohal	Deputy DEO (Male) Karak	Vice S.No.18
3	Malak Khan	SDEO(M) Tank	Deputy DEO (Male) South Waziristan	Vice S.No.15
4	Shahid Hussain	Deputy DEO (M) Lower Chitral In OPS	Deputy DEO (Male) Lower Chitral	Against the already Occupied Post
5	Dilawar Khan	SDEO(M) Lacht Kohat	Deputy DEO (Male) North Waziristan	Vice S.No.19
Ö	Muqaddas Khan	Deputy DEO (M) Upper Chitral in OPS	Deputy DEO (Male) Upper Chitral	Against the already Occupied Post
7.	Abdul Hamid	SDEO (M) Pry: Thall Hangu	Deputy DEO (Male) Kohal	Vice S.No. 16
Ϊ₿Ĩ	Kiramal Shah	SDEO (M) Babozal Swat	Deputy DEO (Male) Swat Upper	Vice S.No.25
9,	Maroof Khan	SDEO (M) Darban Mansehra	Deputy DEO (Male) Mansehra	Vice S No.17
ĩö	Naseer Ahmad	Deputy DEO (M) Abbottabad in OPS	Deputy DEO (Male) Abbottabad	Against the already Occupied Post
11	Ghulam Habib	SDEO (M) Samar Bagh Dir Lower	Deputy DEO (Male) Bajaur	Vice S No.20
12	Mehboob Ellahi	SDEO (M) Drosh Lower Chitral	Deputy DEO (Male) D Lower	·
١.	Muhammad Farcoq	SDEO (M) Karak	Deputy DEO (Male) Orakzai	Vice S.No.14
	· · · · · · · · · · · · · · · · · · ·	Consequential	Posting/ Transfer	- . :
1	4 Zahid Khan TC BS-18	Deputy DEO (Male) Orakzai	Principal (BS-18) GHS Spin South Waziristan	A.V.P
1	5 Khyal Muhammad TC BS-17	Deputy DEO (Male) South Waziristan	HM (BS-17) GHS Shakai South Waziristan	A.V.P
	6 Qaisar Khan MC BS-17	Deputy DEO (Male) Kohal in OPS	SDEO (Male) Lachi Circle Kohat	Vice S No.5
	17 Shams Ur Rahman MC BS-17		SDEO (Male) Fin Balakot Mansehra	Services of Mr. Ghula Jilani (MC BS-16) are place at the disposal DEO (M) Mansehra fo funher posting

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Section Officer (Management Cadre) Elementary & Secondary Edu: Deptt: Govt: of Khyber Pakhtunkhwa

## GOVERNMENT OF KHYBER PAKHTUNKHWA ELEMENTARY & SECONDARY EDUCATION

¥			DEPARTMENT	
	Monthammad Hussain MC BS-17	(Male) Karak in OPS	SDEO(Male) Katav	121213
19	Said Muhammad TC BS-17	Deputy DEO (Male) North Weziristan in OPS	SS (Islamiyat) GHSS Eidak North Wazinstan	A / P
20	Sher Nawab TC BS-18	Deputy DEO (M) Bajaur	Principal GHS Ghazi Baba Bajaur.	,
21.	Saleh Muhammad MC BS-17	SDEO (M) Chakaisor	SDEO(M) Babozai Swal	AJP
22	Mr Gul Bad Shah TC BS-18	Deputy DEO (Male) Baltagram	Principal (BS-18) GHS Bana Aliai Battagram	AVP
23	Wali Ur Rehman MC BS-17	SDEO (Male) Kalkot Dir Upper	SDEO (Male) Allai Battagram	V 5 NO 24
24	Zaril Khan MC BS-17	SDEO (Male) Aliai Battagram	SDEO Tank	V 5 H5 3
25	Nazr Ul Islam Bacha TC BS-17	A REAL PROPERTY AND A REAL	SS (Islamiyal) BS-17 S GHSS Kabal Swat	£78
26	Mr. Shandi Gul TC BS-17	SDEO (M) Landi Kolal Khyber	SS (Pashlo) GHSS Paindi Cheena Khyber	VSNO 25
27	1412 2.2	Asst. Director, E&SE Peshawar	SDEO (M) Landi Kotal Khyber	V 5 10 3
28	Sardar Irshad Ali MC BS-17	Awaiting Posting	SDEO (M) Darban Mansehra	
29		Awaiting Posting	Deputy Director P&D-II Directorate of E&SE Peshawar	· ·
3	D Abdul Shakoor TC BS-17	Deputy Director P&D-II, in OPS Directorate of E&SE Peshawa	S5 (Urdu) GHSS Dherai (Alpuri) Shangi	9 AVP

# TC Transfor with draw -SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA E&SE DEPARTMENT

## Endst: of even No.& date:

Copy forwarded for information to the: -

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.

- 2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
- 3. Director EMIS, E&SE Department with the request to upload the same on the official
- website of the department. 4. Section Officer (Schools Male/Female) E&SE Department.
- 5. District Education Officer (Male) Concerned.
- 6 District Accounts Officer Concerned. 7. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
- Master file. I 8.

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(NASEER ABBAS KHALIL) SECTION OFFICER (Management Cadre

Section Officer (Management Cadre) Elementary & Secondary Edu: Dept Govt: of Khyber Pakhtunkhwa

## GOVERNMENT OF KHYBER PAKHTUNKHWA ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT



Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar Phone No. 091-9210626

Dated: 3rd May, 2023

#### NOTEBOATION

NO.SO(MC)E&SED/2-3/2022/Promotion/MC(BS-17to18) ACB: In the light of the honorable Khyber Pakhtunkhwa Service Tribunal Order dated 12.04.2023 in Service Appeal No.7869/2021, this Department's Notification of even number dated 17.02.2023 regarding posting/transfer in respect of Mr. Dilawar Khan (MC BS-18) appearing at Sr.No.5 and Mr. Said Muhammad (TC BS-17) appearing at Sr.No.19 is hereby restored, in the best public

interest.

#### SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA E&SE DEPARTMENT

#### Endst: of even No.& date:

Copy forwarded for information to the: -

- 1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
- 2. Registrar Service Tribunal Khyber Pakhtunkhwa Peshawar.
- 3. Additional Advocate General Khyber Pakhtunkhwa.
- 4. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
- .5. Section Officer (Lit-II) E&SE Department.
- 6. District Education Officer (Male) North Waziristan.
- 7. District Accounts Officer North Waziristan.
- 8. PS to Advisor to Chief Minister on E&SE Khyber Pakhtunkhwa.
- 9. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
- 10. Officers concerned.

#### (NASEER ABBAS KHALIL) SECTION OFFICER (Management Cadre)

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Section Officer (Managlithent Cadre) Elementary & Secondary Edu: Depti:

Govt: of Knyber Pakhtunkhwa

## GOVERNMENT OF KHYBER PAKHTUNKHWA ELEMENTARY AND SECONDARY-EDUCATION DEPARTMENT Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar Phone No. 091-9210626

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## NOTIFICATION

Daled: 17th August, 2023

NO.SO(MC)E&SED/4-16/2023/Posting/Transfer//DEO(M)NW: Consequent upon the approval of the Competent Authority and subsequent NOC from the Election Commission of Pakistan, the following postings/ transfers are hereby ordered with immediate effect, in the best public interest: -

Sr. No	Name & Designation	From	То	Remarks
1.	Mr. Muhib Ur Rehman	DEO (Male) North	Deputy DEO (Male)	AVP
	MC BS-18	Waziristan In OPS	Kohistan Upper	
2.	Mr. Dilawar Khan	Deputy DEO (Male)	DEO (Male) North	V.S.No.1
-	MC BS-18	North Waziristan	Waziristan in OPS	

#### SECRETARY TO THE GOVT: OF KHYBER PAKHTUNKHWA E&SE DEPARTMENT

#### Endst: of even No.& date:

Copy forwarded for information to the: -

- 1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
- 2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
- Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
- 4. Assistant Director (Election-II) ECP Constitution Avenue G 5/2 Islamabad.

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5. District Education Officer (Male) North Waziristan.

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- 6. District Accounts Officer North Waziristan.
- 7. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
- 8. Officers concerned.
- 9. Master file.

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SECTION OFFICER (Management Cadre)

Section Officer (Management Calife) Elementary & Secondary Edu: Dente Govt: of Khyber Pakhtunkhwa



#### GOVERNMENT OF KHYBER PAKHTUNKHWA ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar Phone No. 091-9210626

#### Dated: 18th August, 2023

## NOTIFICATION

NO.SO(MC)E&SED/2-3/2022/Promotion/MC(BS-17to18) ACB. On the basis of Service Tribunal Judgment dated 02.04.2023 in Service Appeal No. 7869/2021 Title Said Muhammad Vs Government of Khyber Pakhtunkhwa, This Department Notification of even number dated 03.05.2023 is Withdrawn/Cancelled and Restored, Notification dated 03.03.2023 to the extent of Mr. Said Muhammad as DDEO in the best public interest.

#### SECRETARY TO THE GOVT: OF KHYBER PAKHTUNKHWA E&SE DEPARTMENT

#### Endst: of even No.& date:

Copy forwarded for information to the: -

- Accountant General, Khyber Pakhtunkhwa, Peshawar. 1.
- Registrar Khyber Pakhtunkhwa Service Tribunal Peshawar. 2.
- Director, E&SE Khyber Pakhtunkhwa, Peshawar. 3.
- Director EMIS, E&SE Department with the request to upload the same on 4. the official website of the department.
- District Education Officer (Male) North Waziristan. 5.
- District Accounts Officer North Waziristan. 6.
- PS to Secretary, E&SE Department, Khyber Pakhtunkhwa. 7.
- Officers concerned. 8.
- Master file. 9

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SECTION OFFICER (Management Cadre)

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Section Officer (Management/Vadre) Elementary & Secondary Edu: Vepit: Govt: of Khyber Pakhtunkhwa

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#### GOVERNMENT OF KHYBER PAKHTUNKHWA ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Dated Peshawar the January 24, 2022

#### NOTIFICATION

<u>No.SO(SM)E&SED/11-1/2021/Said</u> <u>Muhammad</u> <u>DDEO</u> <u>NW</u>: The Competent Authority/Chief Secretary Khyber Pakhtunkhwa is pleased to constitute Inquiry Committee comprising Mr. Sharif Hussain, (PMS BS-19).Director General PDMA Peshawar and Mr. Muhammad Shiraz, (BS-19) DEO (M) Hangu to conduct formal inquiry against the following officer/officials of DDEO (M) North Waziristan for the charges mentioned in the Charge Sheet and Statement of Allegations.

- i. Mr. Said Muhammad, DDEO, DEO Office NWTD
- ii. Mr. Khalil Ur Rehman, Principal GHSS Miranshah City NWTD
- iii. Mr. Sami Ullah, V/Principal GHSS Eidak NWTD
- iv. Mr. Habibullah, Head Master GHS Gul Muhammad Kot Mandy Khel
- v. Mr. Samir Ullah ADEO (Dev) O/O DEO Office NWTD

2. The inquiry committee shall submit report to the Competent Authority within (30) days positively (Copies of Charge Sheets & Statements of Allegations are enclosed for all concerned).

#### SECRETARY TO GOVT OF KHYBER AKTHUNKHWA E&SE DEPARTMENT

#### Endst: of even No. & Date:-

#### Copy forwarded to the:

2.

- 1. Director, E&SE Khyber Pakhtunkhwa is requested to nominate a Departmental Representative to assist the inquiry committee.
  - Mr. Sharif Hussain, (PMS BS-19) Director General PDMA Peshawar
- 3. Mr. Muhammad Shiraz, (BS-19) DEO (M) Hangu
- 4. Mr. Said Muhammad, DDEO (M) District North Waziristan
- 5. Mr. Khalil Ur Rehman, Principal GHSS Miranshah City NWTD
- 26. Mr. Sami Ullah, V/Principal GHSS Eidak NWTD
  - 7. Mr. Habibullah, Head Master GHS Gul Muhammad Kot Mandy Khel.
  - 8. Mr. Samir Ullah ADEO (Dev) O/O DEO Office NWTD.
  - 9. DEO (M) North Waziristan District.
  - 10. PS to Secretary E&SE Department, Khyber Pakhtunkhwa.
  - 11. Office order file.

(HAFEEZ UR RAHMAN SHAH) SECTION OFFICER (SCHOOLS MALE)

Copy of Charge

Sheet & Statement

of allegations are

18

enclosed.



#### <u>CHARGE SHEET</u>

I, Dr. Shahzad Khan Bangash, Chief Secretary, Khyber Pakhtunkhwa as Competent Authority, hereby charge you Mr. Said Muhmammad, Deputy DEO, North Waziristan Tribal District as follows:

That you, while posted as Deputy DEO, North Waziristan Tribal District, committed the following irregularities:

1. You were authorized as DDO, not entrusted the charge of DEO.

2. You used the powers of DEO and recruited 143 class-IV employees instead of 121 sanctioned posts, without fulfilling codal formalities.

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2- By reason of the above, you appear to be guilty of inefficiency and misconduct, under Rule-3 of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 and have rendered yourself liable to all or any of the penalties specified in Rule-4 of the Rules ibid.

3- You are, therefore, required to submit your written defense within seven days of the receipt of this Charge Sheet to the inquiry officer/ inquiry committee, as the case may be.

4- Your written defense, if any, should reach the inquiry officer/ inquiry committee within specified period, failing which it shall be presumed that you have no defense to put in and, in that case, ex-parte action shall be taken against you.

5- Intimate whether you desire to be heard in person.

Statement of Allegations is enclosed.

6-

#### (DR. SHAHZAD KHAN BANGASH) CHIEF SECRETARY KHYBER PAKHTUNKHWA

Mr. Said Muhmammad, Deputy DEO, North Waziristan Tribal District.

#### DISCIPLINARY ACTION

**I, Dr. Shahzad Khan Bangash, Chief Secretary, Khyber Pakhtunkhwa** as Competent Authority, am of the opinion that Mr. Said Muhmammad, Deputy DEO, North Waziristan Tribal District has rendered himself liable to be proceeded against, as he committed the following acts/omissions, within the meaning of Rule-3 of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011.

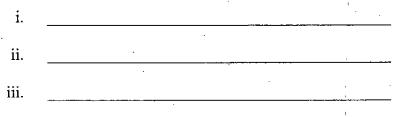
#### STATEMENT OF ALLEGATIONS

1. He was authorized as DDO, not entrusted the charge of DEO.

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2. He used the powers of DEO and recruited 143 class-IV employees instead of 121 sanctioned posts without fulfilling codal formalities

2- For the purpose of inquiry against the said accused with reference to the above allegations, an inquiry officer/ inquiry committee, consisting of the following, is constituted under Rule 10(1)(a) of the ibid Rules:



3- The inquiry officer/ inquiry committee shall, in accordance with the provisions of the ibid Rules, provide reasonable opportunity of hearing to the accused, record its findings and make within thirty days of the receipt of this order, recommendations as to punishment or other appropriate action against the accused.

4- The accused and a well conversant representative of the department shall join the proceedings on the date, time and place fixed by the inquiry officer/ inquiry committee.

화중 (**DR. SHAHZAD KHAN BANGASH)** HIEF SECRETARY KHYBER PAKHTUNKHWA

Mr. Said Muhmammad, Deputy DEO, North Waziristan Tribal District

#### SHOW CAUSE NOTICE

I, Muhammad Azam Khan, Chief Minister Khyber Pakhtunkhwa, as competent authority, under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, do hereby serve you, Mr. Said Muhammad, DDEO, BS-17 (in OPS), DEO Office NWTC as follows: -

- That consequent upon the completion of inquiry conducted against you by the inquiry committee for which you presented your written defense before the inquiry committee;
- (ii) On going through the findings and recommendations of the inquiry committee, the material on record and other connected papers including your defense before the inquiry committee:

I am satisfied that you have committed the following acts/omission specified in Rule-3 of the said rules:

#### Inefficiency & Misconduct

2. As a result thereof, I, as competent authority, have tentatively decide to impose upon you the penalty of \_\_\_\_\_\_ under Rule-- of the said rules.

3. You are, thereof, required to show cause as to why the moresaid perculty should not be imposed upon you and also intimate whether you desire to be heard in person.

4. If no reply to this notice is received within ten days or not more then fifteen days of its delivery, it shall be presumed that you have no defense to put in and in that case an ex-parte action shall be taken against you.

5.

A copy of findings of the inquiry committee is enclosed.

#### (Muhammad Azam Khan) CEIEF MINISTER KHYBER PAKHTUNKHWA

Mr. Said Muhammad, Subject special list (BS-17), working as DDEO,(OPS) DEO Office NWTD

49

## Provincial Disaster Management Authority Khyber Pakhtunkhwa (Headquarter)

Plot 46 A, Sector B-2, Hayatabad Phase-5, Peshawar. Phone: (091) 9211854,9213959 Fax: (091) 9214025 www.pdma.gov.pk



No. PDMA/PStoDG/2021-22

Dated:02.06.2022

То

The Secretary to Government of Khyber Pakhtunkhwa, Elementary & Secondary Education Department.

Subject: <u>INQUIRY REGARDING RECRUITMENT OF 143 CLASS-IV</u> <u>EMPLOYEES INSTEAD OF 121 SANCTIONED POSTS, WITHOUT</u> <u>FULFILLING CODAL FORMALITIES.</u>

Dear Sir,

Please refer to Elementary & Secondary Education Department Notification No. SOG(SM)E&SED/11-1/2021/Said Muhammad DDEO NW: Dated 24<sup>th</sup> January, 2022 on the subject noted above and to enclose herewith Enquiry Report of the subject enquiry conducted by the Enquiry Committee for perusal and further necessary action, please.

unger 3 20

Sharif Hussain DG PDMA Member Enquiry

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# **INQUIRY REPORT**

## REGARDING RECRUITMENT OF 143 CLASS-IV EMPLOYEES INSTEAD OF 121 SANCTIONED POSTS, WITHOUT FULFILLING CODAL FORMALITIES

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#### ENQUIRY REPORT:

We the undersigned were appointed as members of the Enquiry Committee constituted by the Chief Secretary Khyber Pakhtunkhwa vide notification No.SO(SM) E&SED/11-1/2021 /Said Muhammad DDEO NW dated 24-01-2022 (**Annexure-I**) for probing into the allegations of irregularities allegedly committed by the following officers of the office of DEO Tribal District North Waziristan in the appointment of Class-IV staff

(i) Mr. Said Muhammad DDEO, DEO Office NWTD.

(ii) Mr. Khalil ur Rehman Principal GHSS Miran Shah City NWTD

(iii)Mr. Sami ullah V/Prl GHSS Eidak NWTD.

(iv)Mr. Habib ullah H/M GHS Gul Muhammad Kot Mandy khel.

(v) Mr. Samir ullah ADEO (DEV) o/o DEO Office NWTD.

2. There were the following two charges against Mr. Said Muhammad

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i. "He was authorized as DDO, not interested the charge of DEO."

"He used the powers of DEO and recruited 143 Class-IV Employees instead of 121 sanctioned posts, without fulfilling codal formalities."

3. The Charges against officers at serial No. ii, iii, iv and v were the same which are reproduced below;

"Being a member of DSC, he recruited 143 Class-IV Employees instead of 121 sanctioned posts, without fulfilling codal formalities."

4. Copies of the Charge Sheets against the above-mentioned officers added at Annex-II, III, IV, V and VI, respectively.

#### BACKGROUND

5. The DDEO (M) NWTD had appointed Class-IV staff in various male and female schools of Tribal District North Waziristan and submitted in source-I (claims for salary release of the newly appointed Class-IV) to the District Accounts Officer, Tribal District North Waziristan. The DAO raised certain objections over the process of appointment of Class-IV staff and conveyed the same to the DEO North Waziristan with a copy to Section Officer (M) E &SE Department. Consequently, the Deputy Secretary (Assembly Business) E &SE Department was nominated to conduct a fact-finding enquiry. In the fact finding enquiry, the said enquiry officer recommended conducting of a formal enquiry against the DDEO Tribel District North Variation of the same to the DDEO Tribe members of Selection Committee constituted by the said officer for appointment of Class-IV staff.

#### **BRIEF FACTS:**

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6. Mr. Saeed Gul (late) DEO, Tribal District North Waziristan advertised 121 posts of Class-IV staff vide advertisement in the 1st week of January 2021 published in the National daily "AAJ". Soon after the advertisement, the said officer fell seriously ill and passed away on12-03-2021. Thereafter, the then DDEO namely Said Muhammad constituted a Departmental Selection Committee (DSC) vide his office Notification No142-43 dated 22-06-2021 (Annex-VII). The DSC made recommendations for appointment of Class-IV staff on 30-06-2021 (Annex-VIII) and accordingly, appointment orders were issued by the office of DDEO Mr. Said Muhammad. The DSC didn't prepare lists of Class-IV to be appointed on quota seats reserved for Retired Employees Sons, Deceased Employee Sons, Minorities and Disabled persons and no appointments were made against the said quotas. Appointment Order is annexed as (Annex- IX).

#### **PROCEEDING OF ENQUIRY: -**

7. In order to proceed in the matter, all the afore-mentioned alleged officers were summoned by the Enquiry Committee vide letter no. No.PDMA /PS to DG /Misc 2021-22 dated 07-03-2022 to appear before the Enquiry Committee on 10-03-2022 at 12:00 AM in the office of DG PDMA Peshawar for recording statements (Annexure-X)

Section Off

#### FINDINGS OF ENQUIRY:

8. Statement of Mr. Said Muhammad DDEO, Male NTWD with relevant record is added at Annexure- **XI**. As per his statement:

- Consequent upon the demise of the then DEO Mr.Saeed Gull, the post of DEO NWTD fell vacant w.e.f 12-03/2021 and remained so till 14-07-2021. The land donors and the general public, especially those who had applied for the post, were pressing hard his office for making appointment of Class-IV staff whereas the charge of both the posts of DDO male & female was assigned to him (Mr. Said Muhammad). The Minister Relief hailing from North Waziristan District also approached the office of Secretary E & SE with the demand to authorize the office of DDEO NWTD for finalization of the recruitment process of Class-IV staff. He sought guidance from High ups times and again for the resolution of pending cases to address the grievances with respect to delay in the appointment of Class-IV staff but he received no response from the authorities in this regard. Hence, in order to defuse the tense situation aroused due to delay in the process of appointment of Class-IV staff be constituted a

DSC and after fulfilling the codal/ procedural formalities, issued appointment orders of 143 Class-IV staff, instead of the advertised no of posts of 121, in light of Para-3 of the advertisement (Annex-XII). Although he was neither competent authority for doing the same nor any authority was vested in him by the government for making such appointments but later on, the consolidated appointment order was duly countersigned by the DEO Mr Jadoon Khan.

9. Statement of Mr. Khalil ur Rehman Principal GHSS Miran Shah was recorded. Crux of his statement is that he was nominated as a member of DSC by the then DDEO (M) vide Notification No.142-43 dated 22/06/2021. After fulfilling the codal formalities of the appointment process, final list of the recommended candidates was prepared and submitted to the then DDEO dully signed (Annex-XIII).

10. Statement of Mr. Samiullah khan Principal GHSS Eidak NWTD was recorded. According to him, he was nominated as member of DSC by the then DDEO (M) vide Notification No.142-43 dated 22/06/2021. The total advertised posts were 121 but after the sanction of the new posts by Finance Department, the number of posts increased to 143 as there was a provision in the Para-3 of the advertisement to increase or decrease the number of posts (Annex-XIV).

11. The gist of the statements of other officers namely Mr. Habib ullah Head Master GHS Gul Muhammad Kot Mandy khel, was similar to that of Mr. Sami ullah khan Principal GHSS Eidak NWTD **(Annex-XV)**.

12. Statement of Mr. Samir ullah ADEO (DEV) o/o DEO Office NWTD was recorded which seconds the statement of Mr. Habib ullah H/M GHS Gul Muhammad Kot Mandy khel and to Mr. Sami ullah khan Principal GHSS Eidak NWTD (Annex-XVI).

13. Statement of Mr. Jadoon Khan, the incumbent DEO (M) North Waziristan, was recorded. According to him, DDEO Mr. Said Muhammad issued appointment orders of 143 Class-IV staff in different school of North Waziristan in piece meal with different dispatch number on 30-06-2021 and 01-07-2021 and then issued consolidated appointment order on 01-07-2021. He added that no complaint has been received by this office from any quarter regarding the process of appointment o of Class IV staff. (Annex-XVII)

#### **Findings:**

14. From the perusal of the record and the statements of the abovementioned alleged officers / present DEO (M) NWTD, following are findings of The Then DEO (M) NWTD Mr. Said Gul got seriously ill in the month of Jan 2021 and was hospitalized and passed away on 12-03-2021, thus leaving a vacuum in the sphere of regulating the affairs of the office of DEO (M) which was functioning without an authorized officer (DEO) till 14-07-2021.

- (ii) Neither the DDEO was assigned the additional / look after charge of the vacant post of DEO nor any proper DEO was posted therein, despite written request of the then DDEO to the authorities for filling in the said vacant post.
- (iii) The candidates, who had applied for the slots of Class-IV staff, frequently visited the office of DEO and were demanding for recruitment.
- (iv) The Opinion of District Administration was also sought. The statement of Deputy Commissioner and newspaper cutting provided by the District Administration are attached as (Annex-XVIII) which reflect that the situation was not normal and people have resorted to protests demanding appointment against the post of class-IV.
- (v) Mr. Said Muhammad DDEO was raw handed and inexperienced officer.He was unable to tackle the pressure of the community.
- (vi) The present DEO Mr. Jadoon khan stated that no complaint regarding any perceived or alleged irregularity in the recruitment of Class-IV has ever been received by his office.
- (vii) North Waziristan is newly merged tribal district and is in the phase of transition from the status of a tribal agency to that of a settled district. Therefore, implementation of new law/ rules therein seems a difficult task and the orientation of public with new arrangements after merger of erstwhile FATA will take considerable time.

#### CONCLUSION:

15. Based on the above discussion, the Enquiry Committee has come to the following conclusions;

- (i) The allegation No.1 against Mr. Said Muhammad, DDEO NWTD has been proved as nothing in black and white is available in E&SE Department and DEO (M) office NWTD showing that he was appointed as DEO or assigned additional charge of the DEO (M) NWTD.
- (ii) The allegation No.2 against Mr. Said Muhammad, DDEO NWTD is partially proved to the extent that he used the power of DEO inspite of no legal authority. While with regard to increase in number of vacancies from 121 to 143 he can be expected of the charge on the basis of a

provision in the advertisement that allowed the authority to increase/ decrease the no. of vacancies. Besides, sanction was granted by Finance Department for creation of the additional posts of Class-IV staff in NWTD.

- (iii)The same charge against Mr. Khalil ur Rehman Principal GHSS Miran Shah NWTD, Mr. Sami ullah V/Prl GHSS Eidak NWTD, Mr. Habib ullah H/M GHS Gul Muhammad Kot Mandy khel and Mr. Samir ullah ADEO (DEV) o/o DEO Office NWTD is also not proved on the above grounds that there was provision in the advertisement for increase or decrease in No. of vacancies.
- (iv)The Committee recommend further that in order to avoid such sort of incidents in future, the post of DEO may not be left vacant for long.

Mr. Sharif Missain

Director General PDMA, Peshawar.

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Mr. Muhammad Sheraz District Education Officer (M)/Hangu.

Miran Shah-N	.w.
s#:10246	P Sec:001 Month: August 2023
	MW6132 -Govt. High School Mir Sala
Pers #: \$0175086 Buckle:	GHŚ MIR SALAM MANDI KHEL
Name: SAID MUHAMMAD KHAN	NTN:
HEAD MASTER	GPF #:
CNIC NO.2150890189187	òld #:
GPF Interest Applied	
17 Active Temporary	MW6132 -
PAYS AND ALLOWANCES:	
0001-Basic Pay	69,010.00
1001-House Rent Allowance 45%	6,650.00
1210-Convey Allowance 2005	5,000.00
1528-Unattractive Area Allow	2,000.00
1947-Medical Allow 15% (16-22)	1,500.00
2148-15% Adhoc Relief All-2013	700.00
2199-Adhoc Relief Allow @10%	504.00
2315-Special Allowance 2021	6,074.00
2341-Dispr. Red All 15% 2022KP	8,336.00
Gross Pay and Allowances	127,103.00
DEDUCTIONS:	
IT Payable 46,378.60 Deducte	ed 9,276.00 TAX:(3609) 4,638.00
GPF Balance 112,952.00	Subrc: 6,350.00
3501-Benevolent Fund	1,500.00
3990-Emp.Edu. Fund KPK	270.00
4004-R. Benefits & Death Comp:	900.00

13,658.00

113,445.00

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D.O.B LFP Quota: 10.09.1977 HABIB BANK L 14 Years 11 Months 017 Days 180679000478

LFP Quota: HABIB BANK LIMITED INSIDE PREEDY GATE, 18067900047801

Miran Shah-N.W.	
s#:10465	P Sec:001 Month:September 2023
Pers #: 50175086 Buckle:	MW6132 -GOVT. High School Mir Sala GHS MIR SALAM MANDI KHEL
Name: SAID MUHAMMAD KHAN	NTN:
HEAD MASTER	GPF #:
CNIC NO.2150890189187	old #:
GPF Interest Applied	
17 Active Temporary	MW6132 -
PAYS AND ALLOWANCES:	
0001-Basic Pay	69,010.00
1001-House Rent Allowance 45%	6,650.00
1210-Convey Allowance 2005	5,000.00
1528-Unattractive Area Allow	2,000.00
1947-Medical Allow 15% (16-22)	1,500.00
2148-15% Adhoc Relief All-2013	700.00
2199-Adhoc Relief Allow @10%	504.00
2315-Special Allowance 2021	6,074.00
2341-Dispr. Red All 15% 2022KP	8,336.00
Gross Pay and Allowances	127,103.00
DEDUCTIONS:	·
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GPF Balance 119,302.00	Subrc: 6,350.00
3501-Benevolent Fund	1,500.00
3990-Emp.Edu. Fund KPK	270.00
4004-R. Benefits & Death Comp:	900.00

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Viran Shah-N.W	۱,
\$#:10504	P Sec:001 Month:October 2023 MW6132 -Govt. High School Mir Sala
Pers #: 50175086 Buckle:	GHS MIR SALAM MANDI KHEL
VARE: SATO MANAMAD ANAN	NTN:
HEAD WASTER	GPF #:
CNIC NO.2150890189187	01d #:
GPF Interest Applied	
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1001-House Rept Allonance 45%	69,010.00
1210-convey Allonance 2005	6,650.00
1528-Unattractive Area Allow	5,000.00
1947-vedical Allon 15% (16-22)	2,000.00
2148-15% Adhoc Relief All-2013	1,500.00
2199-Adhoc Relief Allow @104	700.00
2315-Special Allowance 2021	504.00
2341-Dispr. Red All 15% 2022KP	6,074.00
Gross Fay and Allowances	8,336.00
EDUCTIONS;	127,103.00
IT Payable 24,734.96 Deducted GPF Balance 125,652.00	
3501-Benevolent Fund	Subrc: 6,350.00
	1,500.00
3990-Emp.Edu. Fund KPK	270.00
4004-R. Benefits & Death Comp:	900.00

12,112.00

114,991.00

D.O.B LFP Quota: 10.09.1977 HABIB BANK LIMITED INSIDE PREEDY GATE, 15 Years 01 Months 017 Days 18067900047801



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Miran Shah-N.W.	
s#:10422	P Sec:001 Month:November 2023
38.10465	MW6132 -Govt. High School Mir/Sala
Pers #: 50175086 Buckle:	GHS MIR SALAM MANDI KHEL
Name: SAID MUHAMMAD KHAN	NTN:
HEAD MASTER	GPF #:
CNIC NO.2150890189187	old #:
GPF Interest Applied	
17 Active Temporary	MW6132 -
PAYS AND ALLOWANCES:	
0001-Basic Pay	69,010.00
1001-House-Rent Allowance 45%	6,650.00
1210-Convey Allowance 2005	5,000.00
1528-Unattractive Area Allow	2,000.00
1947-Medical Allow 15% (16-22)	1,500.00
2148-15% Adhoc Relief All-2013	700.00
2199-Adhoc Relief Allow @10%	504.00
2315-Special Allowance 2021	6,074.00
2341-Dispr. Red All 15% 2022KP	8,336.00
Gross Pay and Allowances	127,103.00
DEDUCTIONS:	
IT Payable 21,642.95 Deducted	20,098.00 TAX: (3609) 3,092.00
GPF Balance 132,002.00	Subrc: 6,350.00 1,500.00
3501-Benevolent Fund	270.00
3990-Emp.Edu. Fund KPK	900.00
4004-R. Benefits & Death Comp:	500100

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HABIB BANK LIMITED INSIDE PREEDY GATE, 18067900047801 LFP Quota:

P Sec:001 Month:December 2023 \$#:9650 MW6132 -Govt. High School Mir Sala GHS MIR SALAM MANDI KHEL Buckle: pers #: 50175086 NTN: SAID MUHAMMAD KHAN Name: GPF #: HEAD MASTER old #: CNIC NO.2150890189187 GPF Interest Applied MW6132 17 Active Temporary AVS AND ALLOWANCES: 69,010.00 0001-Basic Pay 6,650.00 1001-House Rent Allowance 45% \$,000.00 1210-Convey Allowance 2005 2,000.00 1528-Unattractive Area Allow 1,500.00 1947-Medical Allow 15% (16-22) 700.00 2148-15% Adhoc Relief All-2013 504.00 2199-Adhoc Relief Allow @10% 6,074.00 2315-Special Allowance 2021 8,336.00 2341-Dispr. Red All 15% 2022KP 127,103.00 Gross Pay and Allowances EDUCTIONS: 18,550.98 Deducted 23,190.00 3,092.00 TAX: (3609) IT Payable 6,350.00 Subrc: 138,352.00 **GPF** Balance 1,500.00 3501-Benevolent Fund 270.00 3990-Emp.Edu, Fund KPK

Miran Sháh-N.W.

Total Deductions

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Miran Shah-N.W.

PETERIC DIRUT-14-14-	۱
s#:9832	P Sec:001 Month:January 2024
Pers #: 50175086 Buckle:	MW6132 -Govt. High School Mir Sala
Name: SAID MUHAMMAD KHAN	GHS MIR SALAM MANDI KHEL
HEAD MASTER	NTN:
	GPF #:
CNIC NO.2150890189187	old #:
GPF Interest Applied	
17 Active Temporary	MW6132 -
AYS AND ALLOWANCES:	· · ·
0001-Basic Pay	72,430.00
1001-House Rent Allowance 45%	6,650.00
1210-Convey Allowance 2005	5,000.00
1528-Unattractive Aréa Allow	2,000.00
1947-Medical Allow 15% (16-22)	1,500.00
2148-15% Adhoc Relief All-2013	700.00
2199-Adhoc Relief Allow @10%	504.00
2315-Special Allowance 2021	6,074.00
2341-Dispr. Red All 15% 2022KP	8,336.00
Gross Pay and Allowances	130,523.00
EDUCTIONS:	10,525.00
IT Payable 17,062.20 Deducted	26,603.00 TAX: (3609) 3,413.00
GPF Balance 144,702.00	Subrc: 6,350.00
3501-Benevölent Fund	1,500.00
3990-Emp.Edu. Fund KPK	270.00
4004-R. Benefits & Death Comp:	900.00
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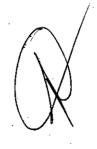
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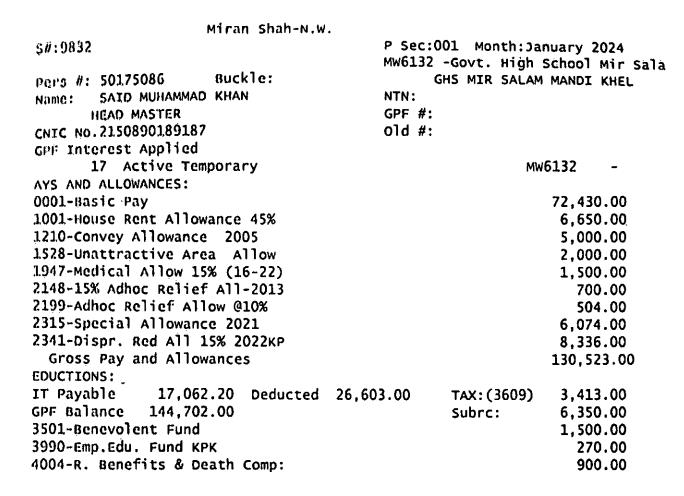
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February 2024

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	GHS MIR SALAM MANDI	Nation
pers #: 50175086 Buckle:		r Rhitisats
NAME: SATO MUNAMAD KHAN		
HEAD MASTER	CPPF #3	
CNIC No.2150890189187		
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1210-Convey Allowance 2005		0.00
1528-Unattractive Area Allow	•	<b>30.00</b>
1947-medical Allow 15% (16-22)		00.00
2148-15% Adhoc Relief A77-2013		00.00
2199-Adhoc Belief Allow G10%		04,00
2315-Special Allowance 2021		14,00
2313-5pectal Add All 15% 2022KP		<b>56</b> .00
Gross Pay and Allowances		()). (X)
DEDUCTIONS:	10.016.00 TAX: (3609) 1.4	14.00
IT Payable 13,649,32 Deducted		SD 00
GPF Balance 151,052.00		
3501-Benevolent Fund	-*	10:00
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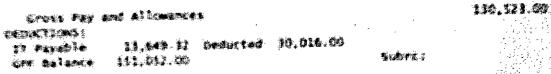
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6.O.B 16.69.1977

11 YEARS OF MONTHS OIS DAYS

LEP QUOLES INSIDE PREEDY CATE, MARIE RAME LIMITED

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10.09.1977

LEP QUOTA: HARTS BANK LIMITED INSIDE PRETER GATE,

P Sec:001 Month:February 2024

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15 years 05 months OIS Days

Total Deductions

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## GOVERNMENT OF KHYBER PAKHTUNKHWA ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Block "A" Civil Secretariat, Peshawar

Phone No. 091-9211128

Dated Peshawar, the 15-03-2024

#### **NOTIFICATION**

NO.SO(Lit-II)/E&SED/1-5/2021. The undersigned is pleased to authorize Additional Secretary (General) Elementary & Secondary Education Department to sign parawise comments, replies, implementation reports, objection petitions, civil miscellaneous applications etc on my behalf for submission before various courts of law/tribunals in the best public interest.

#### SECRETARY Elementary & Secondary Education Department, Khyber Pakhtunkwha

Dated 15-3-2024

Endst: No. 25/9-B

Copy forwarded to the:-

- 1. Chief Secretary Khyber Pakhtunkhwa.
- 2. Advocate General Khyber Pakhtunkhwa.
- 3. Secretary Law Department.
- 4. Registrar Peshawar High Court Peshawar.
- 5. Registrar Service Tribunal Peshawar.
- 6. All Section Officers (Litigation) E&SE Department.
- 7. PS to Secretary E&SE Department.
- 8. PA to Additional Secretary (General) E&SE Department.
- 9. PAs to Deputy Secretary (Legal-I&II) E&SE Department.

(SAJID UJ

SECTION OFFICER (Lit-II)



