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Issue

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

Service Appeal No: 594/2024

Abdul Jalil PSHT GPS Khanano Killi KurramAppellant

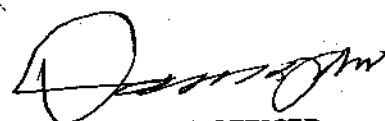
VERSUS

Secretary E&SE Department & others.....Respondents

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**SAMINA ALTAF
DIRECTOR**



**AUTHORIZED OFFICER
ABDUS SAMAD
DEPUTY DIRECTOR
E&SE Department Khyber
Pakhtunkhwa, Peshawar**

①

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

Service Appeal No: 594/2024

Abdul Jalil PSHT GPS Khanano Killi KurramAppellant
Khyber Pakhtunkhwa
Service Tribunal

VERSUS

Entry No. _____

Dated 24-09-24

Secretary E&SE Department & others.....Respondents

JOINT PARAWISE COMMENTS ON BEHALF OF RESPONDENTS No: 1-2.

Respectfully Sheweth,

PRELIMINARY OBJECTIONS.

- 1 That the Appellant has got no cause of action/locus standi to file instant appeal.
- 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.
- 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 Respondent Department for his promotion to the post of SST (G) BPS-16 in violation of the prescribed 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 impugned Notification dated 07-11-2023 is legally competent in all respect & liable to be maintained in favor of the Department.
- 9 That the appellant has not been recommended by the DSC during its meeting held on dated 06-10-2023 to the post of SST in BPS-16.
- 10 That aggrieved from the Notification dated 07-11-2023, the appellant has filed a time bared Departmental appeal dated 12-12-2023 to the Respondent Department which was seen & filed on the grounds of limitation as well as violative of the Law & Rules.
- 11 That the appellant has not impleaded the District Education Officer (Male) Kurram as a Respondent in the titled appeal on mala-fide.
- 12 That similarly the appellant has also not impleaded Syed Basser Hussain & promoted to the post of SST vide Notification dated 07-11-2023 nor Mr. Sakhi Marjan on mala-fide intentions.

ON FACTS.

- 1 That Para-1 pertains to the residential & academic record of the appellant.
- 2 That Para-2 pertains to the academic record regarding MA & B.Ed.
- 3 That Para-3 pertains to the appointment of the appellant against the PST in BPS-7 post as evident from the appointment order dated 01-06-1999 with reference to Serial No. 21 *attached as Annex-A.*
- 4 That Para-4 is incorrect on the grounds that vide order dated 01-06-1999, the appellant was appointed against the PTC in BPS-07 post as an untrained teacher, hence, the claim of the appellant regarding his seniority at Serial No. 95 is illegal & liable to be rejected. Copy of the cited Seniority List is liable to be produced by the appellant.
- 5 That Para-5 is incorrect, the DEO is not competent to recommend the appellant for promotion to the post of SST due to lack of competency & jurisdiction, hence, the minutes of the meeting as referred by the appellant as Annex-D in his appeal is illegal & even ab-initio, hence, no legal effect & liable to be discarded *attached as Annex-B.*
- 6 That Para-6 is incorrect & not admitted, the appellant could not made out his case for promotion to the post of SST in the Notification dated 07-11-2023 *Annex-C* under the Rule & policy in vogue.
- 7 That Pra-7 is correct that a Departmental appeal dated 12-12-2023 was filed by the appellant against the Notification dated 07-11-2023 to an incompetent authority instead of an appellate authority who is Respondent No.1. in the titled case, hence, seen & filed on the ground of limitation of being badly time barred by the Department *attached as Annex-D.*
- 8 That para-8 is incorrect as 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 has got no cause of action to approached this Honorable Tribunal in the titled appeal against the Respondents, therefore, the case in hand is liable to dismissed on the following grounds inter alia: -


ON GROUNDS.

- A. Incorrect & not admitted, the appellant has been treated as per law & rules vide Notification dated 07-11-2023 by the Respondent Department in the titled appeal.
- B. Incorrect & not admitted. The stand of the appellant is against the facts & legal proposition made by the Respondents in the fore going paras of the present reply, as the Notification dated 07-11-2023 is accordance to the provision of Articles-4 & 25 of the constitution of 1973, hence, liable to be maintained.
- C. Incorrect & not admitted, the appellant is not entitled for promotion to the post of SST in BPS-16 under the Rules & Policy & rightly not considered in the Notification dated 07-11-2023 by the Department.
- D. Incorrect & not admitted. The act of the Department with regard to the Notification dated 07-11-2023 is legal with no discrimination to words the appellant in the titled case by the Department.


- E. Incorrect & not admitted. The Notification dated 07-11-2023 is the result of the rules, criteria policy in vogue.
- F. Incorrect & not admitted. The stand of the appellant is against the facts & legal proposition made by the Respondents in the fore going paras of the present reply, as the Notification dated 07-11-2023 is accordance to the provision of Article-27 of the constitution of 1973, hence, liable to be maintained.
- G. Incorrect & not admitted. The stand of the appellant is against the facts & legal proposition made by the Respondents in the fore going paras of the present reply, as the Notification dated 07-11-2023 is accordance to the provision of Article-38 (e) of the constitution of 1973, hence, liable to be maintained.
- H. Incorrect & not admitted. 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. However, the Respondents also seek leave to this Learned Bench to submit additional grounds record & case law at the time on date of hearing.

Therefore, in view of the above made submissions, the appeal in hand may kindly be dismissed in favor of the Department in the interest of justice.

**SAMINA ALTAF
DIRECTOR**


**AUTHORIZED OFFICER
ABDUS SAMAD
DEPUTY DIRECTOR
E&SE Department Khyber
Pakhtunkhwa, Peshawar**

**MASOOD AHMAD
SECRETARY**


**AUTHORIZED OFFICER
FAIZ ALAM
ADDITIONAL SECRETARY (G)
E&SE Department Khyber
Pakhtunkhwa, Peshawar.**

(u)

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

Service Appeal No: 594/2024

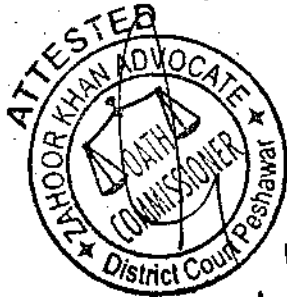
Abdul Jalil PSHT GPS Khanano Killi KurramAppellant

VERSUS

Secretary E&SE Department & others.....Respondents

AFFIDAVIT

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



**SAMINA ALTAF
DIRECTOR**

**AUTHORIZED OFFICER
ABDUS SAMAD
DEPUTY DIRECTOR
E&SE Department Khyber
Pakhtunkhwa, Peshawar**

BEFORE THE HONORABLE KHYBER PAKHATUNKHWA SERVICE TRIBUNAL PESHAWAR.

Application No. _____/2024 in Service Appeal No: 594/2024

Abdul Jalil PSHT GPS Khanano Killi KurramApplicants.

VERSUS

- 1. The Secretary E&SE Department, Khyber Pakhtunkhwa
- 2. Director E&SE KP Peshawar & others.....Respondents

REPLY TO THE APPLICATION FOR CONDONATION OF DELAY ON BEHALF OF THE RESPONDENTS.

Respectfully Sheweth :-

The Respondents submit as under: -

- 1. **That** para-1 pertains to the record of this Honorable Tribunal.
- 2. **That** para-2 is incorrect, as the appeal in hand is badly time barred under the provision of law of limitation Act, 1908 as evident from the Notification dated 07-11-2023, where against, the appellant has filed a Departmental appeal on dated 12-12-2023 which is already time barred, hence, the appeal in hand is liable to be dismissed on the following grounds inter alia: -

GROUND:

- A. **Incorrect & not admitted**, the Notification dated 07-11-2023 is legal & liable to be maintained.
- B. **Incorrect & not admitted**, the stand of the appellant is illegal in the above said terms & liable to be rejected.
- C. **Incorrect & not admitted**, the appeal in hand is admittedly time barred, however, reply to the facts & grounds of the Respondents may also be treated as a part & parcel to the reply of the tilted application on behalf of the Respondents.

In view of the above made submissions, it is most humbly requested that this Honorable Tribunal may very graciously be pleased to dismissed the titled application in favor of the Respondents in the interest of justice.

Dated ___ / ___ /2024.

**SAMINA ALTAF
DIRECTOR**



**AUTHORIZED OFFICER
ABDUS SAMAD
DEPUTY DIRECTOR
E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondents No. 1 & 2)**

BEFORE THE HONORABLE KHYBER PAKHATUNKHWA SERVICE TRIBUNAL PESHAWAR.

Application No. _____ /2024 in Service Appeal No: 594/2024

Abdul Jalil PSHT GPS Khanano Killi KurramApplicants.

VERSUS

- 1. The Secretary E&SE Department, Khyber Pakhtunkhwa**
- 2. Director E&SE KP Peshawar & others..... Respondents**

AFFIDAVIT

I, Samina Altaf, Director (E&SED) Khyber Pakhtunkhwa Peshawar, do hereby solemnly affirm & declare on oath that the contents of the instant application are true & correct to the best of my knowledge & belief & nothing has been concealed from the ambit of this Honorable Tribunal.



Handwritten signature/initials

**SAMINA ALTAF
DIRECTOR**

Handwritten signature
AUTHORIZED OFFICER

**ABDUS SAMAD
DEPUTY DIRECTOR
E&SE Department Khyber
Pakhtunkhwa, Peshawar
(Respondents No. 1 & 2)**

(B)

(13)

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OFFICE OF THE AGENCY EDUCATION OFFICER KURRAM AGENCY PARACHINAR

APPOINTMENT

As already approved by the Selection Committee, the appointment of the following P.T.C (Male & Female) teachers is hereby ordered in the interest of public service with effect from the date of their taking over charge i.e 1.6.1999 in EPS NO.7 and EPS NO.9 for those who are FA/FSc in 2nd Division:-

S.No.	Name of Candidate	Father's Name	School Where Appointed	Remarks.
1.	Khiali Marjan	Abdul Marjan	GPS Sarpakh No.2 F.R.	Against vacant PTC post.
2.	Ahmad Jan	Nowab Jan	GPS Gandow FR	...do...
3.	Bahadur Khan	Barang Kha	GPS Mirdo Tang FR	...do...
4.	Shamim Gul	Mohammad Latif	GPS Sarkhawi Dara FR	...do...
5.	Sakhi Marjan	Fazal Hamid	GPS Shekhani FR	...do...
6.	Fazal Hakim	Mutabar Khan	GPS Dool Ragna FR	...do...
7.	Shukar Khan	Faqir Khan	GPS Audq F.R.	...do...
8.	Footi Marjan	Abdul Marjan	GPS Khani Khol FR	...do...
9.	Usman Khan	Sultan	GPS Sarpakh No.1 FR	...do...
10.	Noor Jamal	Amanullah Khan	GPS Mirdo Tang FR	...do...
11.	Mohammad Daud Shah	Sultan Shah	GPS Shamkani F.R	...do...
12.	Ikhtiar Khan	Khadi Khan	GPS Audq F.R.	...do...
13.	Dilawar Khan	Dilber Khan	GPS Trangwali F.R	...do...
14.	Chazi Marjan	Gul Rehman	CMPS Warsa Mela F.R	...do...
15.	Salamat Khan	Sultan Jan	GPS Daya F.R	...do...
16.	Rehmat Stalam	Haji Subedar	GPS Murgan Dara F.R	...do...
17.	Fazal Ari	Mohammad Younas	GPS Dadmir Kali F.R	...do...
18.	Fazal Wahid	Said Rahim	CMPS Palassen F.R	...do...
19.	Zahid Khan	Lal Wazir	GPS Sandaghar F.R	...do...
20.	Sher Akbar	Said Jamal	GPS Dargai No.1 F.R.	...do...
21.	Abdul Jalil	Eid Akbar	GPS Wam Alisherzai FR	...do...
22.	Mohammad Ayaz	Khan Baz	GPS Khuga China F.R	...do...
23.	Mohammad Nabi	Abdul Khan	GPS Cawdar F.R	...do...
24.	Zarif Khan	Saifullah Khan	GPS Tabai Tangi FR	...do...
25.	Abdul Ghafoor	Mewa Khan	GPS Shekhani F.R	...do...
26.	Lawang Khan	Mohammad Khan	GPS Trangwali F.R	...do...
27.	Imran Badshah	Mir Nazir	GPS Star Kali F.R	...do...
28.	Jamil Khan	Mohammad Younas	GPS Sher Dara F.R	...do...
29.	Speen Gul	Saida Gul	GPS Wam Alisherzai FR	...do...
30.	Amir Salam	Mughal Baz	GPS Khawri Sam F.	...do...
31.	Zaman Khan	Abdullah Jan	GPS Machaki Kali FR	...do...
32.	Abdul Manaf	Hazrat Gul	CMPS Kemal Taza F.R	...do...
33.	Mujeebur Rehman	Said Jamal	GPS Nikah Zharat F.R	...do...
34.	Mohammad Sharif	Momin Khan	GPS Hamish Gul F.R	...do...
35.	Jehanzeb Khan	Naji Din	GPS Barizona F.R	...do...
36.	Rehman Gul	Jaffar Gul	GPS Rego Kali F.R	...do...

Date 01-06-1999

OFFICE OF THE AGENCY EDUCATION OFFICER KURRAM AGENCY PARACHINAR

APPOINTMENT

As already approved by the selection committee the appointment of the following P.T.C (Male & Female) teachers is hereby ordered in the interest of public service with effect from the date of their taking over charge i.e 1.6.1999 in BPS No.7 and BPS No.9 for those who are FA/FSc in 2nd Division:-

S.No.	Name of Candidate	Father Name	School where appointed	Remarks
1	Khiali Marjan	Abdul Marjan	GPS Sarpakh No.2 F.R	Against vacant PTC Post.
2	Ahmad Jan	Nawab Jan	GPS Gandow FR	----- do -----
3	Bahadur Khan	Barang Khan	GPS Mirdo Tang FR	----- do -----
4	Shamim Gul	Mohammad Latif	GPS Sarkhawi FR	----- do -----
5	Sakhi Marjan	Fazal Hamid	GPS Shekhani FR	----- do -----
6	Fazal Hakim	Mutabar Khan	GPS Dool Ragma FR	----- do -----
7	Shukar Khan	Faqir Khan	GPS Auda F.R	----- do -----
8	Tooti Marjan	Abdul Marjan	GPS Khani Khel FR	----- do -----
9	Usman Khan	Sultan	GPS Sarpakh No.1 FR	----- do -----
10	Noor Jamal	Amanullah Khan	GPS Mirdo Tang FR	----- do -----
11	Mohammad Daud Shah	Sultan Shah	GPS Shamkani F.R	----- do -----
12	Ikhtiar Khan	Khadi Khan	GPS Auda F.R	----- do -----
13	Dilawar Khan	Dilbar Khan	GPS Trangwali F.R	----- do -----
14	Ghazi Marjan	Gul Rehman	GPS Warsa Mela F.R	----- do -----
15	Salamat Khan	Sultan Jan	GPS Daya F.R	----- do -----
16	Rehmat Salam	Haji Subedar	GPS Murghan Dara F.R	----- do -----
17	Fazal u ari	Mohammad Younas	GPS Damir Kali F.R	----- do -----
18	Fazal Wahid	Said Rahim	GPS Palaseen F.R	----- do -----
19	Zahid Khan	Lal Wazir	GPS Sandaghar F.R	----- do -----
20	Sher Akbar	Said Jamal	GPS Dargai No.1 F.R	----- do -----
→ 21	Abdul Jalil	Eid Akbar	GPS Wam Alisherzai F.R	----- do -----
22	Mohammad Ayaz	Khan Baz	GPS Khuga China F.R	----- do -----
23	Mohammad Nabi	Abdul Khano	GPS Gawar F.r	----- do -----
24	No Need	No Need	No Need	----- do -----
25	No Need	No Need	No Need	----- do -----
26	No Need	No Need	No Need	----- do -----
27	No Need	No Need	No Need	----- do -----
28	No Need	No Need	No Need	----- do -----
29	No Need	No Need	No Need	----- do -----
30	No Need	No Need	No Need	----- do -----
31	No Need	No Need	No Need	----- do -----
32	No Need	No Need	No Need	----- do -----
33	No Need	No Need	No Need	----- do -----
34	No Need	No Need	No Need	----- do -----
35	Jehanzeb Khan	Naji Din	GPS Barizona F.R	----- do -----
36	Reman Gul	Jaffar Gul	GPS Rego Kali F.R	----- do -----

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(B)

(18)

S.No	Name of Candidate	Father's Name	School Where appointed	Remarks
37.	Ashraf Khan	Ghazi Farjan	GPS Sher Dera F.R	Against vacant PTC post.
38.	Naseeb Shah	Miram Shah	GPS Mughan Dera FR	...do...
39.	Abdur Rahim	Juma Khan	GPS Khawo Kali FR	...do...
40.	Mohammad Younas	Yousaf Khan	GPS Takhtoo F.R	...do...
41.	Sibat Khan	Nawab Khan	GPS Kohidad Khel FR.	...do...
42.	Mohammad Salam	Havildar Khan	GPS Cundal F.R	...do...
43.	Bahadur Khan	Sardar Khan	GPS Zara Mela F.R	...do...
44.	Gul Hussain	Pasta Gul	GPS Zawa F.R	...do...
45.	Hayat Mohammad Khan	Mohammad	GPS Gandow F.R	...do...
46.	Shamsuz Rehman	Abdur Rehman	GPS Baza F.R	...do...
47.	Naseem	Syed Khan	GCPS Osai F.R	...do...
48.	Bibi Maryam	Shama Gul	GCPS Cundal F.R	...do...
49.	Basmeen Begum	Fazli Tawab	GCPS Trang Wali FR	...do...
50.	Abida Nawaz	Nawaz Khan	GCPS Badama F.R	...do...
51.	Nawab Begum	Mir Ahmad	GCPS Dogar No.1 FR	...do...
52.	Nasreen Bibi	Zarif Khan	GCPS Angori F.R	...do...
53.	Aalia	Mohammad Chulam	GCPS Chappri L.K	...do...
54.	Naseem	Saadat Khan	GCPS Pura Kanda Sultan U.K	...do...
55.	Zainab Bibi	Khair Ali	GCPS Pura Kanda Sultan U.K	...do...
56.	Shazia	Sharif Hussain	GCPS Lewan Khel U.K	...do...
57.	Bibi Shah Iran	Yousaf Hussain	GCPS Chuzgari U.K	...do...
58.	Ishal Bano	Iftikhar Hussain	GCPS Mata Mali Khel UK	...do...
59.	Rubaba Bibi	Iftikhar Hussain	GCPS Mali Khel U.K	...do...
60.	Sakina Bibi	Abrar Hussain	GCPS Mata Mali Khel UK	...do...
61.	Bibi Maryam	Asghar Jan	GCPS Chundi Khel U.K	...do...
62.	Bibi Sughra Jan	S.Ahmad Jan	GCPS Chuzgari U.K	...do...

- Note:-
1. The Candidates are directed to produce their Medical certificates from the A.H.Q Hospital Parachinar.
 2. The age of the candidates should be between 18-33 years for male and 18-40 years for female candidates.
 3. Their appointment is purely made on temporary basis and liable to termination at any time without assigning any notice, in case they wish to resign their posts, they will have to give one month prior notice or forfeit one month pay in lieu thereof.
 4. Charge report in duplicate should be submitted to this office.
 5. Certified that no payment will be made to the appointees unless & until their domicile, academic & professional certificates duly verified from the issuing authorities concerned, also produce their National identity cards.

Endst No 1245-31/99 Dated 6/99

- Copy forwarded to the:
1. Director of Education FATA Peshawar in duplicate please.
 2. Regional Director of Education FATA Kohat Region please.
 - 3-71. Candidates concerned, Accountant Local Office, A/ED (P) concerned.
 72. Office record.

Agency Education Officer
Kurram Agency Parachinar

Agency Education Officer
Kurram Agency Parachinar

OFFICE OF THE AGENCY EDUCATION OFFICER, KURRAM AGENCY
PARACHINAR

S. No.	Name of Candidate	Father's Name	School where appointed	Remarks
37.	Ashraf Khan	Ghazi Marjan	GPS Sher Dara FR	Against vacant PTC Post
38.	Naseeb Shah	Miram Shah	GPS Murghan Dara FRdo...
39.	Abdur Rahim	Juma Khan	GPS Khawo Kali FRdo...
40	Mohammad Younas	Yousaf Khan	GPS Takhtoot FRdo...
41	Qibat Khan	Nawab Khan	GPS Kohidad Khel FRdo...
42	Muhammad Salam	Havildar Khan	GPS Gundal FRdo...
43	No Need	No Need	No Need	No Need
44	No Need	No Need	No Need	No Need
45	No Need	No Need	No Need	No Need
46	No Need	No Need	No Need	No Need
47	No Need	No Need	No Need	No Need
48	No Need	No Need	No Need	No Need
49	No Need	No Need	No Need	No Need
50	No Need	No Need	No Need	No Need
51	No Need	No Need	No Need	No Need
52	No Need	No Need	No Need	No Need
53	No Need	No Need	No Need	No Need
54	No Need	No Need	No Need	No Need
55	No Need	No Need	No Need	No Need
56	No Need	No Need	No Need	No Need
57	Bibi Shah Iran	Yousaf Hussain	GGPS Ghugari UKdo...
58	Iqbal Bano	Iftikhar Hussain	GGPS Mata Mali Kheldo...
59	Rubaba Bibi	Iftikhar Hussain	GGPS Mali Khel UKdo...
60	Sakina Bibi	Abrar Hussain	GGPS Mata Mali Kheldo...
61	Bibi Maryam	Asghar Jan	GGPS Ghundi Kheldo...
62	Bibi Sughra Jan	S. Ahmad Jan	GGPS Ghuzgari UKdo...

NOTE:-

1. The candidates are directed to produce their Medical certificates from the AHO Hospital, Parachinar.
2. The age of the candidates should be between 18-33 years for male and 18-40 years for female candidates.
3. Their appointment is purely made on temporary basis and liable to termination at any time without assigning any notice, in case they wished to resign their posts, they will have to give one month prior notice or forfeit one month pay in lieu thereof.
4. Charge report in duplicate should be submitted to this office
5. Certificated that no payment will be made to the appointee, unless and until their domicile, academic & professional certificate duly verified from the issuing authorities concerned, also produce their National Identity Cards.



Agency Education Officer
Kurram Agency

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**MINUTES OF THE MEETING OF REDRESSAL COMMITTEE HELD ON 06th OCTOBER 21 AT 11:30 AM
IN OFFICE OF THE DISTRICT EDUCATION OFFICER KURRAM PARACHINAR.**

A meeting was started by the recitation of Holy Quran. The Chairman of the committee welcomed the members. The committee thoroughly analyzed all the appeals submitted by appellants and concluded thereof the following points:

S.No	Name of appellant	Category	Nature of appeal	Decision of the committee
1.	Habib-ur-Rehman	SAT	Claiming seniority on the basis of DOB	As per 1st applt order the complainant is at S.No.07 dated 12.10.2009 having 54.96 score while the meritorious/senior Abbas Mehdi SAT at S.No. 01 with 74.15 score so the appeal is rejected.
	Abdul Jafil	PSHT	Claiming seniority on the basis of PSHT/DOB	According to the seniority of PSHT Abdul Jafil is at S.No.204 while Sakhi Marjan is at S.No.208. so S.No.205,206 and 207 are not eligible for promotion due to not fit for promotion. Therefore at S.No.208 Sakhi Marjan replaced with Abdul Jafil. Thus his appeal is entertained by committee.
3.	Imran Khan & 09 others	PSTa	Claiming seniority on	The appointment order of

E^y 24

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SST (MALE) KURRAM 1



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

Notification

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.SO (PE)/4-5/SSRC/Meeting/2013/Teaching Cadre dated 24th July, 2014, the following SCTs/CTs PSHTs/SPSTs/PST,SDM/DM,SAT/AT,STT/TT,S,Qari/Qari are hereby promoted/appointed to the post of SST (G),(Bio/Chem) and (Phy/Maths) in BPS-16 on regular/acting cadre basis under the existing policy, on the terms and conditions given below, with immediate effect

A. SST (G)

1. SCT/CT TO SST (G) BPS-16

S. No	S.L No	Name of Official	Place of Posting	Date of Birth	Date of Appoint: as Regular Ct	Qualification	Remarks
1	27	S.Zamin Hussain	GHS Malana	25-04-1965	01-09-2003	BA/B.Ed	Services are placed placed at the disposal of District Education Officer, (M)Kurram for further posting against the vacant post of SST(G)
2	28	Liaq Hussain	GHS Malana	20-03-1970	01-09-2003	BA/B.Ed	-do-
3	29	Baqir Hussain	GHS Borki	01-04-1969	01-09-2003	BA/B.Ed	-do-
4	30	Noor Zaman	GHS Pesar	04-04-1971	01-09-2003	BA/B.Ed	-do-
5	31	Munir Hussain	GHS Luqman Khel	05-05-1969	01-09-2003	BA/B.Ed	-do-
6	32	Muhammad Hanif	GHS Zeran	11-02-1969	01-09-2003	BA/B.Ed	-do-
7	33	Rehman Gul	GCMHS Sadda	12-10-1973	01-09-2003	BA/B.Ed	-do-
8	34	Muhammad Rehman	GHS Bagan	08-10-1971	01-09-2003	BA/B.Ed	-do-
9	35	Rehmat Noor	GHS Uchat	01-03-1970	01-09-2003	BA/B.Ed	-do-

2. PSHT/SPST/PST TO SST (General) BPS-16

S.No	Sl. No.	Name of Official	Place of posting	D/O Birth	Date of Appoint; regular PST	Qualification	Remarks
1	94	S.Bashir Hussain	GPS Speena Mela	10-04-1974	19-09-1998	BA/B.Ed	Services are placed placed at the disposal of District Education Officer (M)Kurram for further posting against the vacant post of SST(G)
2	98	Abdullah	GPS Tindo	09-08-1975	11-05-1999	BA/B.Ed	-do-
3	102	Shamim Gul	GPS Sarkhawida ra	20-02-1974	01-06-1999	BA/B.Ed	-do-

3. SAT/AT TO SST (General) BPS-16

S.No	Sl.No.	Name of Official	Place of posting	D/O Birth	Date of Appoint; regular AT	Qualification	Remarks
1	31	Abbas Mehdi	GHS	16-03-1980	12-10-2009	BA/B.Ed	Services are placed placed at

(Handwritten signatures and stamps)

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SST (MALE) KURRAM 2

			Jalandar				the disposal of District Education Officer (M) Kurram for further posting against the vacant post of SST (G).
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4. SIT/TT TO SST (General) BPS-16

S.No	Sl:No	Name of Official	Place of posting	D/O Birth	Date of Appott; regular TT	Qualification	Remarks
1	49	S.Liaqat Hussain	GMS Ibrahim Zai	21-04-1979	13-12-1999	BA/B.Ed	Services are placed placed at the disposal of District Education Officer (M) Kurram for further posting against the vacant post of SST(G)

5. S.Qari/Qari TO SST (General) BPS-16

S.No	Sl: No.	Name of Official	Place of posting	D/O Birth	Date of Appott; regular Qari	Qualification	Remarks
1	13	S.Wilayat Hussain	GHS Zeran	22-02-1987	09-12-2009	BA/B.Ed	Services are placed placed at the disposal of District Education Officer (M) Kurram for further posting against the vacant post of SST(G)

B. SST (Bio/Chem)

1. PSHT/SPST/PST TO SST (BIO/CHEM) BPS-16.

S. No	Sl: No.	Name of Official	Place of posting	D/O Birth	Date of Appott; regular PST	Qualification	Remarks
1	240	Qasim Muhammad	GPS Paloseen CK	10-05-1984	01-09-2007	BSc/B.Ed	Services are placed placed at the disposal of District Education Officer (M) Kurram for further posting against the vacant post of SST (Bio/Chem).
2	389	Imdad Ullah	GPS Arwalai	25-08-1993	01-11-2016	BSc/B.Ed	Services are placed placed at the disposal of District Education Officer (M) Kurram for further posting against the vacant post of SST (Bio/Chem) BPS-16.Appointed on Acting Charge Basis.

C. SST (Phy-Maths)

ITEM NO.1. SCT/CT TO SST (Phy-Maths) BPS 16

S.No	Sl:No.	Name of Official	Place of posting	D/O Birth	Date of Appott; regular CT	Qualification	Remarks
1	91	Muhammad Rehman	GCMHS Sadda LK	25-12-1985	01-03-2013	BSc/B.Ed	Services are placed placed at the disposal of District Education Officer (M) Kurram for further posting against the vacant post of SST (Ph/Maths).
2	137	Aaqib Zaman	GHS Shah Ibrahim LK	10-02-1986	22-11-2018	B.SC/B.Ed	Services are placed placed at the disposal of District Education Officer (M) Kurram for further posting against the vacant post of SST (Bio/Chem) BPS-16.Appointed on Acting Charge Basis.

[Signature]

[Signature]



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SST (MALE) KURRAM 3

2. PSHT/SPST/PST TO SST (PHY/MATHS) BPS-16

S. No	Sl. No.	Name of Official	Place of posting	D/O Birth	Date of Appott; regular PST	Qualif- cation	Remarks
1	393	Hazrat Gul	GPS Sadda LK	03-02-1992	16-10-2017	BSc/B.Ed	Services are placed placed at the disposal of District Education Officer (M) Kurram for further posting against the vacant post of SST (Ph/Maths) BPS-16.Appointed on Acting Charge Basis

Terms and Conditions: -

- 1 They would be on probation for a period of one year extendable for further period of one year.
- 2 They will be governed by such rules and regulations as and when issued from time to time by the Govt.
- 3 Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
- 4 Charge report should be submitted to all concerned.
- 5 No TA/DA is allowed for joining the duty.
- 6 They will give an under-taking to be recorded in their Service Book to the effect that if any over payment is made to them in the light of this order, will be recovered, and if they are wrongly promoted, they will be reverted.
- 7 Before handing over the charge, once again their documents may be checked and if they have not the prescribed qualifications as per rules, they may not be handed over charge of the post.
- 8 The prescribed qualifications/ documents may be verified from the concerned Universities/ Institutions by the DEO concerned.

(Dr. Iqbal Khan)

Director Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.

Endst: No. 27258-64/Promotion to SSTs (Male) Kurram

Dated Peshawar the 07/11/2023

Copy forwarded for information and necessary action to the: -

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. District Education Officer (M) Kurram.
3. District Accounts Officer Kurram.
4. PS to Secretary Elementary & Secondary Education Department, Khyber Pakhtunkhwa Peshawar.
5. In-charge of EMIS Local Office with the request to upold the Notification on Official wibside.
6. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
7. M/File.

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

1/12/2023
DO 2023/12

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**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. 594/2024 case titled Abdul Jalil PSHT, Kurram Vs Government of Khyber Pakhtunkhwa & others, hence, an authority letter is hereby issued in favor of the above-named officer.

**(SAMINA ALTAF)
DIRECTOR**

**AUTHORIZED OFFICER
(ABDUS SAMAD)
DEPUTY DIRECTOR
E&SE Department Khyber
Pakhtunkhwa, Peshawar.**



**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT KHYBER PAKHTUNKHWA PESHAWAR**

NOTIFICATION

I, Samina Altaf, Director Elementary & Secondary Education Department Khyber Peshawar do hereby authorize, Mr. Abdus Sammad, Deputy Director (Legal) Directorate of Elementary & Secondary Education to sign parawise comments, replies, implementation report, objection petitions, civil miscellaneous application etc on my behalf for onward submission before the courts of law/tribunals as the case may be, with immediate effect in the interest of public service.

DIRECTOR
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst. No. 2133-L13 /F.No. AD(Lit-II)/E&SED/Office Correspondence/Vol-II/2024
Dated Peshawar the 26/07/2024.

Copy of the above is forwarded for information & n/action to the:

1. Chief Secretary Khyber Pakhtunkhwa.
2. Advocate General Khyber Pakhtunkhwa.
3. Secretary Law Department Khyber Pakhtunkhwa.
4. Learned Registrar High Court Peshawar (with one each spare copy for the Honorable Judges).
5. Learned Registrar Khyber Pakhtunkhwa Service Tribunal Peshawar (with one each spare copy for the Honorable Chairman/Members).
6. All Section Officers E&SE Department Khyber Pakhtunkhwa, Peshawar.
7. All District Education Officer (Male/Female) Khyber Pakhtunkhwa.
8. PS to Secretary E&SE Department Khyber Pakhtunkhwa, Peshawar.
9. PA to Additional Secretary (General) E&SE Khyber Pakhtunkhwa, Peshawar.
10. PA to Director E&SE Department Khyber Pakhtunkhwa, Peshawar.
11. Master File.


(SAMINA ALTAF)
DIRECTOR
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar