


Form- A

FORM OF ORDER SHEET

Court of _____

Implementation Petition No. 1260/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	22.10.2024	<p data-bbox="544 631 1433 1080">The implementation petition of Mr. Muhammad Rehman received today by registered post through Muhammad Irshad Tanoli Advocate. It is fixed for implementation report before touring Single Bench at A.Abad on 30.10.2024. Original file be requisitioned. AAG has noted the next date. Counsel for the petitioner has been informed telephonically.</p> <p data-bbox="979 1110 1369 1149">By order of the Chairman</p> <p data-bbox="1075 1141 1283 1263"> REGISTRAR</p>

The C.M in appeal no. 8634/2020 received today i.e. on 19-8-2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

1. Page no. 6 to 20 are not legible be replace with legible one.


No. 674 /S.T,

Dt. 9/9 /2024


ASSISTANT
TO REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR

Muhammad Arshad Khan Tanoli
Advocate, Abbottabad.

Register envelop show
date of posting as 20⁹/₂₄
but in fact, the same
was received on 10-10-24.
objection removed as
required


Muhammad Arshad Khan Tanoli
Advocate Supreme Court of Pakistan
Office #2, Jinnah / 12 / Adhac / 10
Abbottabad

**BEFORE THE CHAIRMAN KHYBER PAKHTUNKHWA, SERVICE
TRIBUNAL COURT (STC) PESHAWAR**

F.P No:- 1260/2024
Service Appeal No.8634/2020

Rafaqat Ali son of Khanizaman, resident of Village Kanshian Post Office Balakot
Tehsil Balakot District Mansehra, CT Teacher GHS Bela Manoor District
Mansehra

...APPELLANT

VERSUS

District Education Officer (Male) Mansehra.

...RESPONDENT

APPLICATION

INDEX

S.#	Description	Page No.	Annexure
1.	Implementation Application	1 to 5	
2.	Copy of initial appointment order as well as termination order	6-10	"A"
3.	Copy of KP Sacked Employment Act 2012	11-20	"B"
4.	Copy of appointment order dated 20/06/2019 and withdraw/order dated 28/02/2020	21-23	"C"
5.	Copies of both the consolidated judgment	24-30	"D" & "E"
6.	Copy of appointment order of the appellant/petitioner as well as attendance sheet from the daily attendance register w.e.f 17/12/2022 by till date	31	"F"
7.	Complete DATA showing staff statement of staff of the school and visits of monitoring cell of education department showing name of the appellant/petitioner.	32-45	"G"
8.	In this regard copies of application	46	"H"
9.	Copies of application	47-48	"I" & "J"
10.	Wakalatnama	49	

...APPLICANT/PETITIONER

Dated: 10/8/2024

Through

(Muhammad Arshad Khan Tanoli)
Advocate Supreme Court of Pakistan

(Muhammad Ibrahim Khan)
Advocate High Court

**BEFORE THE CHAIRMAN KHYBER PAKHTUNKHWA, SERVICE
TRIBUNAL COURT (STC) PESHAWAR**

E.P.No:- 1260/2024

Service Appeal No.8634/2020

Rafaqat Ali son of Khanizaman, resident of Village Kanshian Post Office
Balakot Tehsil Balakot District Mansehra, CT Teacher GHS Bela Manoor
District Mansehra.

...APPELLANT

VERSUS

District Education Officer (Male) Mansehra.

Khyber Pakhtunkhwa
Service Tribunal
Diary No. 15046
Dated 19/8/24

...RESPONDENT

**APPLICATION FOR PAYMENT OF SALARY
W.E.F 27/02/2020 AND IMPLEMENTATION OF
JUDGMENT IN SERVICE APPEAL
NO.8634/2020 DECIDED ON 22/07/2022.**

Respectfully Sheweth;-

1. That the petitioner/appellant was appointed as CT Teacher on 24/11/1996 and his service was terminated on 07/07/1997. Copy of initial appointment order as well as termination order is attached as Annexure "A".

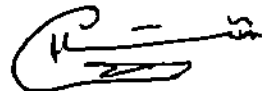
2. That respondents department promulgated KP Sacked Employment Act 2012 for appointment of the petitioner/appellant alongwith other and similarly placed employees. Copy of KP Sacked Employment Act 2012 is attached as Annexure "B".
3. That respondent issued appointment order of the petitioner/appellant on 20/06/2019 but same was withdrawn on 28/02/2020. Copy of appointment order dated 20/06/2019 and withdraw/order dated 28/02/2020 are attached as Annexure "C".
4. That the petitioner/appellant assailed the withdraw/order dated 28/02/2020 before this Honourable Tribunal vide Service Appeal No.8634/20 which was decided on 22/07/2020.
5. That, this Honourable Tribunal discussed appeal of the appellant in detail vide consolidated judgment in Service Appeal No.5793/2020 dated 22/07/2020. Copies of both the consolidated judgment are attached as Annexure "D" & "E".

6. That the petitioner/appellant was reinstated in service dated 17/12/2022 and the petitioner/appellant is still serving as CT Teacher in Govt. High School Bela Manoor. Copy of appointment order of the appellant/petitioner as well as attendance sheet from the daily attendance register w.e.f 17/12/2022 by till date is attached "F". Besides, complete DATA showing staff statement of staff of the school and visits of monitoring cell of education department showing name of the appellant/petitioner is attached "G".
7. That the respondents ordered denovo inquiry which was duly conducted and the appellant/petitioner was exonerated but the inquiry report has not been provided to the appellant/petitioner. In this regard, the appellant/petitioner time and again wrote the application regarding findings of denovo inquiry reports. In this regard copies of application are attached as Annexure "H".
8. That as stated above the appellant/petitioner was appointed initially on 20/06/2019 and secondly on 17/12/2022. That the appellant/petitioner being

dutiful teacher and is not being paid salary on the basis of golden principle "work done to be paid".

9. That, it is further submitted that, the appellant/petitioner filed representation for payment of salary to respondent but the respondent did not exceeded to the applications of the appellant/petitioner so far. Copies of application are attached "I" & "J".

In view of above, it is prayed that respondent may be directed to release the salary of the appellant/petitioner w.e.f 20/06/2019 and later on w.e.f 17/12/2022 to till date. Any other relief which this Honourable Tribunal may deem fit and proper may also be granted to the appellant/petitioner accordingly.



...APPLICANT /PETITIONER

Through

Dated: 10/8 /2024



(Muhammad Arshad Khan Tanoli)
Advocate Supreme Court of Pakistan

&



(Muhammad Ibrahim Khan)
Advocate High Court Abbottabad

**BEFORE THE CHAIRMAN KHYBER PAKHTUNKHWA, SERVICE
TRIBUNAL COURT (STC) PESHAWAR**

Service Appeal No.8634/2020

Rafaqat Ali son of Khanizaman, resident of Village Kanshian Post Office
Balakot Tehsil Balakot District Mansehra, CT Teacher GHS Bela Manoor
District Mansehra

...APPELLANT

VERSUS

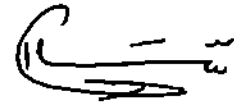
District Education Officer (Male) Mansehra.

...RESPONDENT

APPLICATION

AFFIDAVIT

I, *Rafaqat Ali son of Khanizaman, resident of Village Kanshian Post Office
Balakot Tehsil Balakot District Mansehra, CT Teacher GHS Bela Manoor
District Mansehra*, do hereby solemnly affirm and declare that the contents of
foregoing application are true and correct to the best of my knowledge and
belief and nothing has been concealed therein from this Honourable Court.



DEPONENT



Annex-A

P-6

OFFICE OF THE DIRECTOR OF EDU(S) HAZARA DIVISION ABBOTTABAD.

APPOINTMENT.

Mr/Ms. Rafiqat Khatun Son/Daughter of S/O

Mansoor Ahmad Resident of Village Kashmir

District Manshera is hereby appointed as CT

in NPS No. 195-0162 @RS. 100/- Plus usual allowance at

RS. 5000/- with effect from the date of taking over

charge in the interest of public service on the following terms

& conditions:-

TERMS & CONDITIONS.

- 1- The appointment is purely on Temporary basis and liable to be terminated at any time without notice or assigning reasons.
- 2- He/She should produce his/her Health & Age Certificate from the Medical Superintendent concerned.
- 3- The head of the Institution/Office is required to check all the original Edu:Qualification & Professional Qualification Certifications before handing over charge.
- 4- The head of the Instt./Office is required to get verified his/her Certificate from the board/University/Registrar/concerned.
- 5- The appointment of Trained Candidates who passed their post-graduation from other than HPP is provisional and subject to the verification of Certifications.
- 6- In case he/she wish to resign from service he/she will have to give one month prior notice or forfeit one month's pay in lieu of short notices.
- 7- The appointment shall stand automatically cancelled if he/she failed to join the post within fifteen days of the issuance of this ORDER letter / Order.
- 8- Special Repatriation of marriage leave for 2-1/2% has already been allowed vide Govt: of NWFP, SSGAD letter No. SOS-III (SSGAD) 2-94 dated 13-7-1994.
- 9- The TA/DA is allowed on lat Appointment.
- 10- Charge reports should be submitted to all concerned.
- 11- He/She should not be handed over charge if his/her age is above 35 years or below 18 years.

(FAZAL-UH-REHMAN KHAN)
REGIONAL DIRECTOR OF EDUCATION (S)
HAZARA DIVISION ABBOTTABAD.

Encl: No. 6050-59 Dated Abbottabad the 29/11/1994

Copy of the above is forwarded to :-

- 1- P/S to Minister (S/S) NWFP Peshawar.
- 2- The Director Secondary Edu: NWFP Peshawar.
- 3- The District Edu: Officer (M-S) / (Female-Secondary) /
- 4- Principal / Headmaster/Headmistress.
- 5- District Accounts Officer.
- 6- All the concerned (S) & (M) Offices.
- 7- Office Order File.

REGIONAL DIRECTOR OF EDUCATION (S)
HAZARA DIVISION ABBOTTABAD.

Munammad Misnad Khan
Munammad Misnad Khan (ano)
Advocate Supreme Court of Pakistan
Office # 337 Jinnah Plaza Adjacent to
Sri Bar Abbottabad

OFFICE OF THE DIRECTOR OF EDUL(S) HAZARA
DIVISION ABBOTTABAD

APPOINTMENT

Mr. / Mis. Rafaqat Ali Son/Daughter of Khanizaman resident of Village Kanshian District Mansehra is hereby appointed as CT in RPS No. BPS-9 fixed @ RS. 1665 FIX as usual allowance at GHS, Bela Manoor with effect from the date of taking over charge in the interest of public service on the following terms & conditions:-

TERMS & CONDITIONS.

1. The appointment is purely on temporary basic and liable to be terminated at any time without notice or assigning reason.
2. He/She should produce his/her health & age certificate from the medical superintendent concerned.
3. The head of the institution/officer is required to check all the original Education Qualification & professional qualification certificates before handing over charge.
4. The head of the Instt./Office is required to get certified her Certificate from the Board/University/Registrar/concerned.
5. That appointment of trained candidates who passed their proof examinations from other than NWFP is provisional and subject to the verification of Certificates.
6. In case he/she wish to resign from service he/she will have to one month prior notice or period of one month pay in light of short notices.
7. The Appointment shall stand automatically cancelled if he/she failed to join the post within fifteen days of the issuance of this letter/order.
8. Special relaxation of upper age limit for 2 years has already been allowed vide Govt. of NWFP, S&GAD letter NO. SOS-III(S&GAD) B-94 dated 18/07/1984.
9. No TA/BA is allowed on 1st appointment.
10. Charge reports should be submitted to all concerned.

11. He/She should be handed over charge if his/her age is extended 32 years or below 18 years.

(FAZAL-UR-REHMAN KHAN)
DIVISIONAL DIRECTOR OF EDUCATION (S)
HAZARA DIVISION ABBOTTABAD

Endst: No. 6050-59/Dated Abbottabad the 24/11/1996

Copy of the above is forwarded to:

1. P/S to Minister (S/S) NWFP Peshawar.
2. The Director Secondary Edu: NWFP Peshawar.
3. The District Edu: Officer (M-S)/(Female-Secondary).
4. Principal/Headmaster/Headmistress.
5. District Account Officer.
6. Candidate Concerned (8) SDEO council Officer.
7. Office Order File.

DIVISIONAL DIRECTOR OF EDUCATION (S)
HAZARA DIVISION ABBOTTABAD

DIRECTOR GENERAL OF EDUCATION, PAKISTAN

Dated 07/07/1997

P-7

MEMORANDUM

On the personal or telephone request the appointments of the following qualified teachers have been found eligible, and subject to the prescribed rules, therefore, their services are hereby dispensed to, with immediate effect:-

- 10. Humaira and Pakizul Hameed
- 11. Sult-Ur-Rahman S/O Shadi Azam.
- 12. Murtaza Khan S/O Farid Khan R/O Abbotabad.
- 13. Talibq Ahmad S/O Moid Anwar R/O Abbotabad.
- 14. Khan Arzoo S/O Moe Arzaf Khan R/O Abbotabad.
- 15. Riaz Khan S/O Ghulam Sarwar R/O Haripur.
- 16. Muhammad Saleem S/O Muddis Khan.
- 17. Nadzer Javed S/O Muhammad Rashid.
- 18. Muhammad Akhtar S/O Moe Arzaf.
- 19. Abdul Wahid S/O Muhammad Wahid.
- 20. Fakhir Mahmood S/O Muhammad Yousaf.
- 21. Saqib S/O Nadzer Javed.
- 22. Arsalan Khan S/O Shoaib Ahmed R/O Sahiwal.
- 23. Humid Khan S/O Muhammad Rafique Khan R/O Abbotabad.
- 24. Muhammad Rafique S/O Muhammad Khan.
- 25. Samid Khan S/O Parva Khan R/O Abbotabad.
- 26. Farid Mahmood S/O Muhammad Arzaf R/O Haripur.
- 27. Saqib Khan S/O Muhammad Anwar.
- 28. Zaffar Iqbal S/O Moid Muhammad.
- 29. Moe Babadar S/O Ghulam Qadir.
- 30. Akhtar Bano S/O Ghulam Hyder R/O.
- 31. Moe Farzaf S/O Farzaf Moe-Nasir R/O Abbotabad.
- 32. Babar Khan S/O Moe Sarwar R/O Haripur.
- 33. Abdul Wahid S/O Khan Qadir.
- 34. Jehanil Khan S/O Fiaz Khan.
- 35. Hawasah Moe S/O Muhammad Zaher R/O Muzaffargarh.
- 36. Khadim Khan S/O Moe Farzaf Khan R/O Abbotabad.
- 37. Shoukat Moe S/O Muhammad Yousaf.

Munammad Arshad Khan Jango
 Advocate Supreme Court of Pakistan
 Office # 33 Jinnah Plaza (Adjacent
 to Bar Abbottabad)

RECEIVED
 DIRECTOR GENERAL OF EDUCATION
 PAKISTAN
 ISLAMABAD

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Page 1 of 1

REGISTRATION
Advocate Supreme Court



ATTESTED
CERTIFIED TRUE COPY

Advocate Supreme Court of Pakistan
Office (33) Signah Plaza Adjacent
111, Bar Abad

M. A. Khan
M. A. Khan

- 20. Munir and Fatima Hameed
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On the receipt of request record the appointment of the Registrar (Munir) has been found illegal, and accordingly the Registrar (Munir) has been removed from the service, and hereby appointment is hereby cancelled with immediate effect.

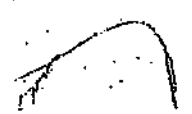
P-8

REGISTRATION
Advocate Supreme Court
Office (33) Signah Plaza Adjacent
111, Bar Abad

3

RASHEED-UL-HAQ
Advocate Supreme Court
Karachi

ATTESTED
CENTRAL INTELLIGENCE DIVISION



Muhammad Arshad Khan
Advocate Supreme Court of Pakistan
Office # 33 Jinnah Plaza Adjacent

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- 28 No. 29. * Mr. Arshad Khan s/o Arshad Khan R/O Abbottabad.
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copy of apt order may
be furnished.

The above mentioned teachers are working at this stage and compliance
is forthwith where ever they are working at this stage and compliance
is reported to this office.

DIVISIONAL DIRECTOR OF EDUCATION (S)
(GENERAL PURPOSE)

RAJIB ULLAH QAZI
Advocate Supreme Court
Abbottabad

ATTESTED
CERTIFIED TRUE COPY

Munir Ahmad Khan
Advocate Supreme Court of Pakistan
Office: 33 Jinnah Plaza Adjacent
to the Supreme Court

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P-12

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| 20. | Muhammad S/O Akhtar Khan |
| 19. | Muhammad S/O Akhtar Khan |
| 18. | Muhammad S/O Akhtar Khan |
| 17. | Muhammad S/O Akhtar Khan |
| 16. | Muhammad S/O Akhtar Khan |
| 15. | Muhammad S/O Akhtar Khan |
| 14. | Muhammad S/O Akhtar Khan |
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| 6. | Muhammad S/O Akhtar Khan |
| 5. | Muhammad S/O Akhtar Khan |
| 4. | Muhammad S/O Akhtar Khan |
| 3. | Muhammad S/O Akhtar Khan |
| 2. | Muhammad S/O Akhtar Khan |
| 1. | Muhammad S/O Akhtar Khan |

OFFICE OF THE DIRECTOR OF EDUL(S) HAZARA DIVISION
ABBOTTABAD

Office Order No.

Dated: 07/07/1997

NOTIFICATION:

On the present of relevant record the appointment of the following m (Male) teachers have been found illegal ab-initio, void and against the prescribed rules of therefore, their allowance are hereby _____ with immediate effect:-

No. **Name and Father Name.**

1. Saif-ur-Rehman S/o Abdul Azam.
2. Murtaza Khan S/o Israil Khan R/o Abbottabad.
3. Ishfaq Ahmed S/o Muhammad Amin R/o Abbottabad.
4. Khan Afsar S/o Mir Afzal Khan R/o Abbottabad.
5. Riaz Khan S/o Ghulam Sarwar /o Haripur.
6. Muhammad Saleem S/o Salahadin
7. Qadeer Javed S/o Muhammad Javed
8. Muhammad Akhtar S/o Mir Afzal.
9. Muhammad Khatib S/o Muhammad Ishaq.
10. Talha Mehmood S/o Muhammad Younis.
11. Khaqan son of Safdar Khan.
12. Arsalan Khan S/o Saeed Ahmed R/o Mansehra.
13. Hamid Khan S/o Muhammad Rafique Khan R/o Abbottabad.
14. Muhammad Rafique S/o Muhammad Khan.
15. Juniad Khan S/o Khalid Khan R/o Abbottabad.
16. Tariq Mehmood son of Muhammad Afzal R/o Haripur.
17. Zahid Khan S/o Muhammad Ashraf.
18. Zaffar Iqbal S/o Noor Muhammad.
19. Mir Bahadar S/o Ghulam Qadar.
20. Akhtar Nawaz S/o Ghulam Hyder.
21. Amir Fazal S/o Fazal-ur-Rehman R/o Abbottabad.
22. Muhammad Ahmed S/o Mazhar Muhammad R/o Haripur.
23. Abdul Malik S/o Khan Gul.
24. Ishmail Khan S/o Ilyas Khan.
25. Nawazish Ali S/o Muhammad Zaheer R/o Mansehra.
26. Khuadad Khan S/o Sher Dil Khan R/o Abbottabad.
27. Shoukat Ali S/o Muhammad Yousif.
28. _____ son of Sardar Khan.
29. Tariq Khan son of Zar Khan resident of Abbottabad.
30. Mehmood ur Rehman son of Noor Hassan.
31. Shoukat Hussain son of Jilal Shah.
32. Fida Ahmed Abbasi son of Mushal resident of Abbottabad.

33. Muhmmad Irshad son of Muhammad Arshad resident of Abbottabad.
34. Hafeez-ur-Rehman son of Mazoor ur Rehman.
35. Liaqat Mehmood son of Ali Akbar resident of Haripur.
36. Safdar Ali son of Ali Akbar resident of Abbottabad
37. Attiq ur Rehman son of Akbar resident of Abbottabad
38. Mazhar Ali son of Khawaja resident of Mansehra.
39. Jamshad Khan son of Younas Khan Abbottabad.
40. Iftikhar Ahmed son of Fazular Rehman.
41. Zahid Parvez son of Dilawar Khan Haripur.
42. Iatasham Ahmed son of Shabir Ahmed Abbottabad.
43. Ashraf Ahmed son of Taj Muhammad
44. Ali Ahmed son of Eosherwan.
45. Muhammad Shahbir son of Waria Haripur
46. Jasam Asghar son of Ali Asghar Abbottabad.
47. Adwarul Haq son of Muhammad Illyas
48. Muhammad Javad son of Ajab Khan.
49. Muhammad Saraj Khan son of Noor Khan Mansehra.
50. Khalid Mehmood son of Khuda Baksh
51. Rukhsar Ahmed son of Muhammad Khursheed.
52. Khawar Khan son of Roadil Khan Abbottabad
53. Abdul Zameer son of Rehim Shah Mansehra.
54. Zahid Khan son of Ajab Khan Abbottabad.
55. Abdur Hussain son of Khalil ur Rehman Abbottabad
56. Waqar Gul Khan son of Gul Khan Abbottabad.
57. Muhammad Safdar son of Jehandad Khan Abbottabad.
58. Munir Ahmed son of Mefoo Zullah Mansehra.
59. Muhammad Hamayun son of Mis Esan Mansehra.
60. Amanullha son of Qazi Ayaz Khan Abbottabad.
61. Muhammad Arshad son of Gulistan Khan, Abbottabad.
62. Attiqur Rehman son of Abdullha.
63. Iftikhar son of Ali Zaman.
64. Kashaf Khan son of Hamayun Khan Abbottabad
65. Arif Lodhi son of Ayub Lodhi Abbottabad
66. Naveed Ayaz son of Muhammad Ayaz Khan Mansehra
67. Muhammad Ali Khan son of Muhammad Naveed Khan Mansehra
68. Dilshad Khan son of Mohsan Mansehra.
69. Qaiser Rehman son of Abdul Rehman
70. Hussain Shah son Illyas Shah
71. Adil Mir son of Abdul Latif Mir
72. Maroof Shah son of Afsar Khan
73. Amin Khan son of Mohsan Khan
74. Nazakat Hussain Shah son of Amin Shah
75. Muhammad Irshad son of Sohaib Abbottabad
76. Bin Yameen son of Muhammad Ramzan
77. Iftikhar Ahmed son of Shabir Ahmed
78. Abdur Rashid son of Sultan Khan
79. Ghulam Wajhat son of Ghulam Rasool
80. Sarfaraz Khan son of Khawaj Muhammad.
81. M Ahmed son of Roshan Din

82. Sarfraz Khan son of Aslam Khan.
83. Abid Khan son of Mir Dad Khan
84. Muhammad _____ son of Muhammad Zaman
85. Zafar Iqbal son of Ghulam Sarwar
86. Muhammad _____ son of Muhammad Aslam.
87. Gul Hamid Khan son of Abid ur Rehman
88. Khalid Mehmood son of Muhammad Yousaf.
89. Muhammad Farooq son of Muhammad Sajid
90. Muhammad Javeed son of Mir Ahmed
91. Khabeer Ahmed son of Bashir Ahmed
92. Muhammad Saeed son of Muhammad Aslam
93. Fida Ahmed son of Nisar Ahmed
94. Muhammad Sajid son of Sultan
95. Abdul Qayum son of Lal Khan
96. Muhammad _____ son of Umer Khatab
97. Muhammad Saeed _____ GHS, Kot Najibullah Haripur
98. Mazhar Iqbal son of Fazal ur Rehman
99. Mehoob ur Rehman son of Fazal Dad
100. Mir Dad Khan son of Jehandad Khan
101. Muhammad Hafeez son of Ali Asghar
102. Faqmand son of Jaffar Khan
103. Atiqur Rehman son of Noor ur Rehman
104. Muhammad Tufail son of Allhadad Mansehra
105. _____ Ahmed son of Muhammad Qasim
106. Waris son of Mehmood Rehman
107. Muhammad Azam Khan son of Muhammad Aslam
108. Gul Javed son of Munsif Khan
109. Attiq ur Rehman son of Abdur Rashid
110. Muhammad Abid son of Safdar Khan
111. Rafaqat Ali son of _____ Zaman
112. Naseer ud Din son of Nawab Din
113. Zulfiqar son of Abdul Kabeer
114. Annsar Gul son of Allahdad
115. Muhammad Javed son of Rustam Khan
116. Muhammad Nawaz son of Ali Asghar
117. Muhammad Naveed SDO DM GMS, Salhad

All the above mentioned teachers may please be relieved of their duties forthwith where ever they are working at this stage and compliance reported to this office.

(UMAR FAROOQ)
DIVIL: DIRECTOR OF EDUCATION (S)
HAZARA DIVISION ABBOTTABAD

Endstt: No. 6052/89/AB-III-B Dated 07/07/1996

The DNOs, (M) _____ Abad, Haripur Mansehra Battagram, and Kohistan
All the Principal/Headmaster GHSS/GHS/ in Hazara Division the remarks that
since present azoct where about is not known the services of the above named
teachers where ever they are working a theist stage stand dispensed with and Head
of Institution/DEO, concerned will be personal responsible if any teacher _____
and allowed to continue in service complete particular at above teacher any also
please be furnishes duties following from Name Father's Name present
_____ Designation School.

Note; Photo State Attested
Copy of Apptt: order may

ANNEX - C

ANNEX - B

Annexure

EXTRAORDINARY
GOVERNMENT



REGISTERED NO. III
GAZETTE

P-11

KEYBER PAKHTUNKHWA

Published by Authority

PESHAWAR, THURSDAY 20TH SEPTEMBER, 2012.

PROVINCIAL ASSEMBLY SECRETARIAT,
KEYBER PAKHTUNKHWA

NOTIFICATION

Dated Peshawar, the 20th September, 2012.

No. PA/Khyber Pakhtunkhwa/Dills/2012/6077. The Khyber Pakhtunkhwa Sacked Employees (Appointment) Bill, 2012 having been passed by the Provincial Assembly of Khyber Pakhtunkhwa on 10th September, 2012 and assented to by the Governor of the Khyber Pakhtunkhwa on 17th September, 2012 is hereby published as an Act of the Provincial Legislature of the Khyber Pakhtunkhwa.

THE KHYBER PAKHTUNKHWA SACKED EMPLOYEES (APPOINTMENT) ACT, 2012

(KHYBER PAKHTUNKHWA ACT NO. XVIII OF 2012)

(First published after having received the assent of the Governor of the Khyber Pakhtunkhwa in the Gazette of the Khyber Pakhtunkhwa (Extraordinary), dated the 20th September, 2012.)

AN
ACT

to provide relief to those sacked employees in the Government service who were appointed, employed or terminated from service by appointing them into the Government service

WHEREAS it is expedient to provide relief to those sacked employees who were appointed on regular basis to a civil post in the Province of the Khyber Pakhtunkhwa and who possessed the prescribed qualification and experience required for the said post, during the period from 1st day of November, 1993 to the 30th day of November, 1998 (both days inclusive) and who: discharged, removed, or terminated from service during the period from 1st day of November, 1998 to 31st day of December, 1998 on various grounds;

WHEREAS the Federal Government has also given relief to the sacked employees by enactment;

Muhammad Arshad Khan
Muhammad Arshad Khan
Advocate Supreme Court of Pakistan
Office # 33 Jinnah Plaza Adjacent
Distt. Bar Abbottabad

AND WHEREAS the Government of the Khyber Pakhtunkhwa has also decided to appoint these sacked employees on regular basis in the public interest;

It is hereby enacted as follows:

1. **Short title, extent and commencement.**—(1) This Act may be called the Khyber Pakhtunkhwa Sacked Employees (Appointment) Act, 2012.

(2) It shall apply to all those sacked employees, who were holding various civil posts during the period from 1st day of November, 1993 to 30th day of November, 1996 (both days inclusive).

(3) It shall come into force at once.

2. **Definitions.**— In this Act, unless the context otherwise requires, the following expressions shall have the meanings hereby respectively assigned to them that is to say,—

(a) "civil post" means a post created by the Finance Department of Government for the purposes of civil service of the Province;

(b) "Department" means the Department and the Attached Department as defined in the Khyber Pakhtunkhwa Government Rules of Business, 1985, including the Divisional and District offices working thereunder;

(c) "Government" means the Government of the Khyber Pakhtunkhwa;

(d) "Prescribed" means prescribed by rules;

(e) "Province" means the Province of the Khyber Pakhtunkhwa;

(f) "rules" means the rules made under this Act; and

(g) "sacked employee" means a person who was appointed on regular basis to a civil post in the Province and who possessed the prescribed qualification and experience for the said post at that time, during the period from 1st day of November, 1993 to the 30th day of November, 1996 (both days inclusive) and was dismissed, removed, or terminated from service during the period from 1st day of November, 1996 to 31st day of December, 1998 on the ground of irregular appointment.

3. **Appointment of sacked employees.**— Notwithstanding anything contained in any law or rule for the time being in force, on the commencement of this Act, all sacked employees subject to section 7, may be appointed in their respective cadre of their concerned Department, in which they occupied civil posts before their dismissal, removal and termination from service:

Provided that the sacked employees shall be appointed against thirty percent of the available vacancies in the said Department:

Provided further, that the appointment of sacked employees shall be subject to the medical fitness and verification of their character antecedents to the satisfaction of the concerned competent authority.

Muhammad Ashraf Khan, Advocate
Advocate Supreme Court of Pakistan
Office # 33 Jinnah Plaza Adjacent
Dist. Bar, Abbottabad

4. **Five relaxation.**— The period during which a sacked employee remained dismissed, removed or terminated from service, till the date of their appointment shall be deemed to have been automatically relaxed and there shall be no further relaxation under any rules for the time being in force.

5. **Sacked employees shall not be entitled to claim seniority and other back benefits.**— A sacked employee appointed under section 3, shall not be entitled to any claim of seniority, promotion or other back benefits and his appointment shall be considered as fresh appointment.

6. **Preference on the basis of age.**— On the occurrence of a vacancy in the respective cadre of the concerned Department of the sacked employee against the thirty percent available share, preference shall be given to the sacked employee who is older in age.

7. **Procedure for appointment.**— (1) A sacked employee, may file an application, to the concerned Department, within a period of thirty days from the date of commencement of this Act, for his appointment in the said Department:

Provided that no application for appointment received after the due date shall be entertained.

(2) The concerned Department shall maintain a list of all such sacked employees whose applications are received under sub-section (1) in the respective cadres in chronological order.

(3) If any vacancy occurs against the thirty percent available share of the sacked employee in any Department, the senior in age from such sacked employees shall be considered by the concerned Departmental Selection Committee or the District Selection Committee, as the case may be, to be constituted in the prescribed manner, for appointment.

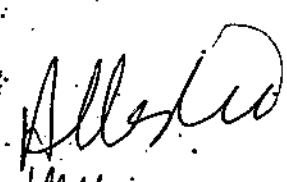
Provided that no willingness or response is received within a period of thirty days, the next senior sacked employee shall be considered for appointment.

(4) The concerned Departmental Selection Committee or District Selection Committee, as the case may be, will determine the suitability or eligibility of the sacked employee.

(5) If no sacked employee is available against thirty percent vacancy reserved in respective cadre in a Department, then the post shall be filled through initial recruitment.

8. **Removal of difficulties.**— If any difficulty arises in giving effect to any of the provisions of this Act, the Chief Minister, Khyber Pakhtunkhwa may issue such order not inconsistent with the provision of this Act, as may appear to him to be necessary for the purpose of removing the difficulty.

Provided that no such power shall be exercised after the expiry of one year from coming into force of this Act.


Muhammad Khan Iano
Advocate Supreme Court of Pakistan
Office # 33 Jinnah Plaza Adjacent to
Distt Bar Abbottabad

P-14

P-15

4-

14th KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 20th SEPTEMBER, 2012.

17. Act to override other laws— Notwithstanding anything to the contrary contained in any other law or rules for the time being in force, the provisions of this Act shall have overriding effect and the provisions of any other law or rules to the extent of inconsistency to this Act, shall cease to have effect.

18. Power to make rules— Government may make rules for carrying out the purpose of this Act.

BY ORDER OF MR. SPEAKER


PROVINCIAL ASSEMBLY OF KHYBER
PAKHTUNKHWA

(AMIRULLAH)

Secretary

Provincial Assembly of Khyber Pakhtunkhwa

Published and printed by the Manager,
State & P.T.C. Press, Dargah Pindi, Abbottabad, Pakistan.



Muhammad Arshad Khan (Adv)
Advocate Supreme Court of Pakistan
Office # 33, Jinnah Plaza Adjacent to
Distt. Bar Abbottabad

Better copy - P-15

P-15

KHYBER PAKHTUNKHWA
PUBLISHED BY AUTHORITY
PESHAWAR, THURSDAY, 20TH SEPTEMBER 2012
PROVINCIAL ASSEMBLY SECRETARIAT
KHYBER PAKHTUNKHWA

NOTIFICATION

Dated Peshawar, the 20th September, 2012.

No. PA/Khyber Pakhtunkhwa/Bills/2012/6077. The Khyber Pakhtunkhwa Sacked Employees (Appointment) Bills, 2012 having been passed by the Provincial Assembly of Khyber Pakhtunkhwa on 10th September 2012 and assented to by the Governor of the Khyber Pakhtunkhwa on 17th September, 2012 is hereby published as an Act of the Provincial legislature of the Khyber Pakhtunkhwa.

THE KHYBER PAKHTUNKHWA SACKED EMPLOYEES
(APPOINTMENT) ACT, 2012

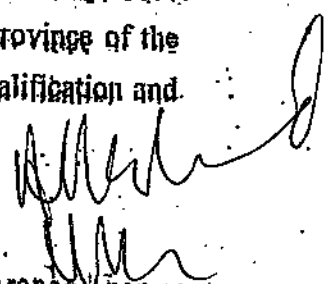
(KHYBER PAKHTUNKHWA ACT NO. XVII OF 2012)

(First Published after having received the assent of the Governor of the Khyber Pakhtunkhwa in the Gazette of the Khyber Pakhtunkhwa (Extraordinary), dated the 20th September, 2012).

AN
ACT

To provide relief to those sacked employees in the Government service who was dismissed moved or terminated from service by appointing them into the Government service.

WHEREAS it is expedient to provide relief to those sacked employees who were appointed on regular basis to a civil post in the Province of the Khyber Pakhtunkhwa and who possessed the regular basis qualification and


Muhammad Arshad Khan Iano
Advocate Supreme Court of Pakistan
Office # 33 Jinnah Plaza Adjacent to
Distt Bar Abbottabad

P-16

P-~~16~~

experience required for the said post. During the period from 1st day of November, 1993 to the 30th day of November, 1996 (both days inclusive), and were dismissed removed, or terminated from service during the period from 1st November, 1996 to 31st day of December, 1998 on various grounds;

WHEREAS the Federal Government has also gives relief to the sacked employees by enactment;

Khyber Pakhtunkhwa Government Gazette, Extraordinary, 20th September, 2012.

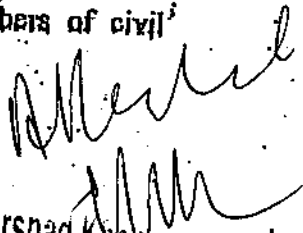
AND WHERE AS the Government of Khyber Pakhtunkhwa has also decided to appoint these sacked employees on regular basis in the public interest.

It is hereby enacted as follows:

1. Short title and commencement (1) This Act may be called the 'Khyber Pakhtunkhwa Sacked Employees (Appointment) Act, 2012.
2. It shall apply to all those sacked employees, who were holding various civil posts during the period from 1st day of November, 1993 to 30th day of November, 1996 (both days inclusive).
3. It shall come into force at once.

DEFINITIONS: In this Act, unless the context otherwise requires, the following expressions shall have the meanings hereby respectively assigned to them that is to say.

- a. Civil post means a post created by the Finance Department of Government for the members of civil service of the Province.

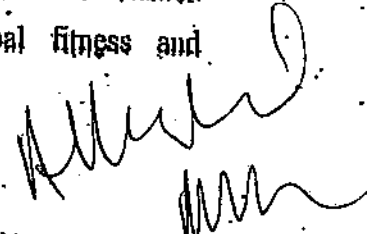

Muhammad Arshad Khaylan
Advocate Supreme Court of Pakistan
Office # 33 Jinnah Plaza Adjacent to
District Bar Abbottabad

- P-17 P-38
- b. Department means the Department and the attached Department as defined in the Khyber Pakhtunkhwa Government Rules of Business, 1985, including the Divisional and District offices working there under.
 - c. Government means the Government of the Khyber Pakhtunkhwa.
 - d. Prescribed means prescribed by rules.
 - e. Province means the Province of the Khyber Pakhtunkhwa.
 - f. Rules means the rules made under this act. And
 - g. Sacked employee means a person who was appointed on regular basis to a civil post in the Province and who possessed the prescribed qualification and experience for the said post at that time. During the period from 1st day of November, 1993 to the 30th day of November, 1996 (both days inclusive) and was dismissed removed or terminated from service during the period from 1st day of November, 1996 to 31st day of December, 1998 on the ground of irregular appointments.

Appointment of sacked employees. Not with standing contained in any law or rule for the time being in force, on the commencement of this Act, all sacked employees subject to section 7 may be appointed in their respective cadre of their concerned Department, in which they occupied civil posts before their dismissal removal and termination from service.

Provided that the sacked employees shall be appointed against thirty percent of the available vacancies in the said Department.

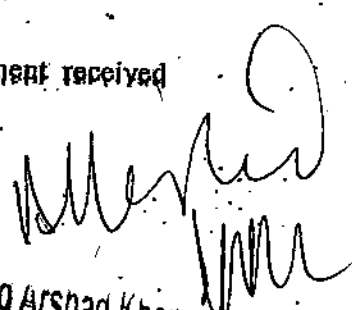
Provided further that the appointment of sacked employees shall be subject to the medical fitness and


Muhammad Arshad Khan Janjani
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Office # 31 Jinnah Plaza Adjacent to
1st Floor Abbottabad

P-18 P-39
verification of their character antecedents to the satisfaction of the concerned competent authority.

**KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE,
EXTRAORDINARY, 20TH SEPTEMBER 2017.**

4. **Me relaxation:-** The period during which a sacked employee repanded dismissed removed or terminated from service till the date of their appointment shall be deemed to have been automatically relaxed and there shall be no further relaxation under any rules for the time being in force.
5. **SACKED EMPLOYEES SHALL NOT BE ENTITLED TO CLAIM SENIORITY AND OTHER BACK BENEFITS:** A sacked employee appointed under section 3, shall not be entitled to any claim of seniority promotion or other back benefits and his appointment shall be considered as fresh appointment.
6. **PREFERENCE ON THE BASIS OF AGE:** On the occurrence of a vacancy in the respective cadre of the concerned Department of the sacked employee against the thirty percent available share preference shall be given to the sacked employee who is older in age.
7. **PROCEDURE FOR APPOINTMENT:-** A sacked employee may file an application to the concerned Department within a period of thirty days from the date of commencement of this Act, for his appointment in the said Department.
Provided that no application for appointment received after the due date shall be entertained.


Munammad Arshad Khan Iano,
Advocate Supreme Court of Pakista
Office 7, 33 Jinnah Plaza Adjacent
Saf. Bar Abbottabad

P-19

P-~~19~~

(2). The concerned Department shall maintain a list of all such sacked employees whose applications are received under subsection (1) in the respective cadres in chronological order.

(3). If any vacancy occurs against the thirty percent available share of the sacked employee in any Department, the senior in age from such sacked employee shall be considered by the concerned Departmental Selection Committee or the district Selection Committee, as the case may be to be constituted in the prescribed manner for appointment.

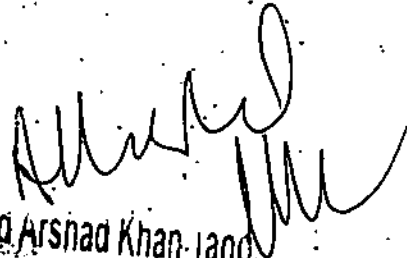
(4). The concerned Departmental Selection Committee or District Selection Committee as the case may be will determine the suitability or eligibility of the sacked employee.

(5). The sacked employee is available against thirty percent vacancy reserved irrespective cadre in a Department, then the post shall be filled through initial recruitment.

REMOVAL OF DIFFICULTIES:- Any difficulty arises in giving effect to any of the provisions of this Act, the Chief Minister Khyber Pakhtunkhwa may issue such order not inconsistent with the provision of this Act, as may appear to him to be necessary for the purpose of removing the difficulty.

Provide that no such power shall be exercised after the expiry of one year from coming into force of this Act.

KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 20TH SEPTEMBER 2012.


Muhammad Arshad Khan, Advocate
Advocate Supreme Court of Pakistan
Office # 33, Jinnah Plaza Adjacent
Distt. Bar Abbottabad

P-20 P-21

ACT TO OVERRIDE OTHER LAWS: No by the standing any thing to the contrary contained in any other law or rules for the time being in force the provision of this Act shall have overriding effect and the provisions of any other law or rules to the extent of inconsistency of this Act, shall cease to have effect.

POWER TO MAKE RULES: Government may make over for carrying out the purpose of this act.

BY ORDER OF MR SPEAKER

PROVINCIAL ASSEMBLY OF KHYBER
PAKHTUNKHWA

(AMANULLAH)
SECRETARY
PROVINCIAL ASSEMBLY OF KHYBER
PAKHTUNKHWA

Muhammad Arshad Khan Tanc
Advocate Supreme Court of Pakistan
Office # 33 Jinnah Plaza Adjacent
Distt. Bar Abbottabad

Annex-C

30

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MANSEHRA

P-21

APPOINTMENT

In pursuance of Khyber Pakhtunkhwa Sacked Employees (Appointment) 2012 and Concillidate Judgment passed by Honnoble Peshawar High Court Abbottabad Bench Abbottabad vide Dated 24-05-2016, 27-03-2018, 03-04-2018 & 07-03-2019 in W/P No 516-A/2013, 676-A/2015, 20-A/2014, 216-A/2015, 1155-A/2016, 702-A/2014, 115-A/2014, and orders of Honnoble High Court in COC No. 22-A/2016, COG No. 47-A/2016, COC No. 58-A/2016, COC No. 03-A/2016, COC 14/2019, and recommendation of the Departmental Selection Committee the appointment of the following candidates are hereby ordered against the vacant post of CERTIFIED TEACHER (CT) DPS-15 (Rs.16120-13330-56020) plus usual allowances as admissible under the rules, under the existing policy of the Provincial Government, on the terms and condition given below with effect from the date of their taking over charge:-

S. No	Name	Father's Name	Date of Birth	Domicile	Permanent Address	Place of posting	Remarks
1	M. PERVAZ	DURIAMAN	MANSEHRA	05-06-1963	VILLAGE PATIANI P/O SRI PERHINNA TEHSIL & DISTRICT MANSEHRA	GHS CHINARKOT	AGAINST VACANT POST
2	M. HAWAZ	M. MUMTAZ	MANSEHRA	01-02-1972	VILLAGE DADAR MOORI MAIDAN P/O DHARYAL TEHSIL & DISTRICT MANSEHRA	GHS MATTHAL JADBORI	AGAINST VACANT POST
3	MUHAMMAD SAID	M. SADIQ	MANSEHRA	01-03-1971	VILLAGE & P/O UPPER CHANNAR TEHSIL & DISTRICT MANSEHRA	GMS BAI PALEM	AGAINST VACANT POST
4	SHER AFZAL	SHER MUHAMMAD	MANSEHRA	28-03-1972	VILLAGE BANARKOT TEHSIL OGHI DISTRICT MANSEHRA 1	GMS KILANIAN KHAKI	AGAINST VACANT POST
5	RAFAQAT ALI	KHANIZAMAN	MANSEHRA	10-5-1972	VILLAGE ANI P/O KANSHIAN TEHSIL BALAKOT DISTRICT MANSEHRA	GHS DAILA MANOOR	AGAINST VACANT POST
6	KIJAZ AHMED	M. NASIM	MANSEHRA	02-03-1973	VILLAGE KANSHIAN P/O BALAKOT TEHSIL BALAKOT DISTRICT MANSEHRA	GMS DATANGI	AGAINST VACANT POST
7	MUHIR AHMED	HAFIZULLAH	MANSEHRA	01-01-1969	VILLAGE KARAL P/O GARHI HABIBULLAH TEHSIL BALAKOT DISTRICT MANSEHRA	GHS KHAIRABAD	AGAINST VACANT POST
8	ZARDAD KHAN	HADAYTULLAH	MANSEHRA	03-08-1965	VILLAGE LAAS MAIRA BARARKOT P/O GARHI HABIBULLAH TEHSIL BALAKOT DISTRICT MANSEHRA	GMS CHORY PHAIR	AGAINST VACANT POST
9	ABOUL MALIK	KHAN GUL	MANSEHRA	06-02-1976	VILLAGE KHABA KHATTA GAJI P/O BAT BARI TEHSIL BALAKOT DISTRICT MANSEHRA	GMS SRI MANOOR	AGAINST VACANT POST
10	SILAH ZAMAN	BAGA	MANSEHRA	05-05-1977	VILLAGE BATSANGRA TEHSIL BALAKOT DISTRICT MANSEHRA	GHS PARAS	AGAINST VACANT POST

TERMS & CONDITIONS.

NO TA/DA etc is allowed.

Charge reports should be submitted to all concerned in duplicate.

Their Appointment are subject are condition that their certificates/document and domicile be verify from the concerned authority before releasing their salary in the light of Section 3 of the said ACT.

They will be governed by such rules & regulation enforce and as may be prescribed by the Government time to time for the category of the Government savant to which they belong.

Their appointment has been made in pursuance of Khyber-Pakhtunkhwa, Sacked Employee (appointment) ACT 2012. Hence under Section 5 of the said ACT they shall not be entitled to any claim of the seniority, promotion and back benefits.

Their appointment has been made in pursuance of Khyber Pakhtunkhwa, Sacked Employee (appointment) ACT 2012. Hence Section 4 of the said ACT period during which they remained dismissed, removed or terminated from services, till the date of their appointment shall have been deemed atomically relaxed.

Their Appointment is subject to the condition that the certificates/documents must be verified from the concerned authorities by the DEO. Anyone found producing bogus Certificate will be reported to the law enforcing agencies for further action.

Their services are liable to termination on one month's prior notice from either side. In case of resignation without notice his one-month pay/allowances shall be forfeited to the Government.

Their pay will not be drawn until and unless a certificate to the effect by DEO is issued that his certificates/degrees are verified from the concerned board/university.

The Principal / Headmaster School concern is directed to submit their Degrees /Certificates etc to this office for verification from Board /University/Institutions before any payment made to them.

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Muhammad Arshad Khan Iano
Advocate Supreme Court of Pakistan
Office # 33 Jinnah Plaza Adjacent
Dist. P. Abbottabad

P-22

- 22
12. They should join their post within 15 days of the issuance of this notification. In case of failure to join their post within 15 days of the issuance of this notification, his appointment will expire automatically and no subsequent appointment etc shall be entertained.
 13. Health and Age Certificate should be produced from the Medical Superintendent King Abdullah Teaching Hospital Mansehra before taking over charge.
 14. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
 15. Their services shall be terminated at any time, in case his performance is found unsatisfactory during probation period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
 16. In case of having less qualification which ever is prescribed Academic BA for CT as well as classical certificate in profession the candidate must attain prescribed qualification for his post i.e. Academic & Professional within years after issuance of this appointment order, failing which their appointment order shall stand terminated automatically, without any further notice.
 17. Before handing over charge once again their documents must be checked by Head of Institution and co-ordinating officer to check for deficiencies in qualification to DEO office.
 18. Before handing over charge they will sign an affidavit by stating that they will not claim seniority or benefits/service and they will acquire required qualification within stipulated period of time, failing which they will have no objection on their removal.
 19. The competent authority reserve the right to rectify the error / omission, if any noted /observed at any stage in the instant order issued erroneously.
 20. The candidates appointed against the school(s) falling in summer vacation shall be handed over the charge on 01-09-2019 on opening of school after summer vacation.
 21. Their documents if found fake/bogus at any stage, their appointment order shall be withdrawn and legal action be taken against him.

DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

Enlist: No. 16268-74/CT/Sacked Appc./2019/Dated Mansehra the 20/6/2019

Copy forwarded for information to the:-

1. Registrar Honorable Peshawar High Court Abbottabad Bench.
2. Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. PS to Secretary Khyber Pakhtunkhwa E&SE Department Peshawar.
4. District Accounts Officer Mansehra.
5. District Monitoring Officer Mansehra.
6. Budget & Account Officer Local Office.
7. Officials Concerned.
8. Office Order File

Sd/-
DY: DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

[Handwritten signatures]

P-23



OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MANSEHRA

Phone # 0997-382271

Fax # 0997-382244

E-mail Address: edoedu_mansehra@yahoo.com

(S)

NOTIFICATION

Mr. Rafaqat Ali S/O Khani Zaman CT GHS Bela Manoor Mansehra, WHEREAS Mr. Rafaqat Ali CT GHS Bela Manoor Mansehra was proceeded against under Khyber Pakhtunkhwa, Government Servants (Efficiency & Discipline) Rules, 2011 on account of fake and fabricated documents have been found in service record and tempering in documents was proved.

- i. Whereas Mr. Rafaqat Ali CT was reappointed and posted at GHS Bela Manoor District Mansehra under sacked Employee Act 2012 vide this office vide Endst No. 10268-74 dated 20-06-2019. On the basis of documents provided by you as per direction of Honourable Peshawar High Court Abbottabad Bench vide his judgment dated 03-04-2018.
- ii. Whereas according to the Terms and Condition NO.20 of the appointment order is that "their documents if found fake/bogus at any stage, their appointment order shall be withdrawn and legal action be taken against him."
- iii. Whereas after Issuing of appointment order the competent authority sent a letter to the Head Master GMS Sokhal Mansehra for re-verification of record of Mr. Rafaqat Ali s/o Khani Zaman Ex- CT GMS Sokhal vide letter No. 10702 dated 25-06-2019.
- iv. After verification of your documents/service record, fake and fabricated documents have been found in your service record.
- v. Whereas, as per report of the Head Master GMS Sokhal vide dated 07-10-2019 with the remarks that "Mr. Rafaqat Ali CT has never ever been appointed vide Endst No. 6050-59 dated 24-04-1996 at GMS Sokhal, acquaintance role, attendance register, log book and appointment order file were checked no such record was found of the said person in our school for the period 1996-1997.
- vi. Whereupon the initial inquiry, conducted by the officer on 06-08-2019, the said committee submitted report to this office on 12-08-2019, with the remarks that Mr. Rafaqat Ali tempered/forged his name at serial No.126 in Termination order vide Endst 16052-189 dated 07-07-1996 and no record was found in school record the case is fake, so the appointment order may be withdrawn. It shows that you have committed misconduct /illegality thus violated E&D rule, 2011.
- vii. WHEREAS as per inquiry report dated 12-08-2019, a showcause notice was issued to concerned vide this office No. 16343 dated 07-10-2019, but Mr. Rafaqat Ali Failed to reply Final show cause notice issued vide Endst No.17698 dated 07-11-2019, and received reply of showcause on 13-11-2019
- viii. Whereas, he was called for personal hearing vide this office No. 18160-61 dated 25-11-2019, but he did not attend the personal hearing before the Competent Authority. Whereas he was again called for personal hearing on 30-01-2020, while attending the office of undersigned on 15-02-2020 and heard.
- ix. AND WHEREAS the competent authority District Education Officer (M) E&SE Mansehra after having considered the charges and evidence on record, perusal of reply of show cause notice & Personal hearing, is of the view that the charges against the accused Teacher have been proved. Therefore the appointment order vide Endst No.10268-74 dated 20-06-2019 in r/o Mr. Rafaqat Ali CT GHS Bela Manoor Mansehra is hereby **WITHDRAWN** from the date of issue of re-appointment order (Ab-initio Withdrawn), with immediate effect.

Endst: No. 249-25 /F.No.Final Showcause/Appoint: 2019 (M) /Dated 27/02/2020
Copy forwarded for information to the:

1. Director E&SE Khyber Pakhtunkhwa Peshawar.
2. District Monitoring Officer (IMU), Mansehra.
3. District Account Officer, Mansehra
4. Head Master GHS Bela Manoor.
5. Mr. Rafaqat Ali Residence of village Kanshan P/o Kanshan, Talisil Balakot District Mansehra.
6. Office File.

Sd/-
DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

Muhammad Shad Khan Iano
Advocate Supreme Court of Pakistan
Office # 33 Jinnah Plaza Adjacent
Peshawar

BY: DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

Annex- 1

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR
AT CAMP COURT ABBOTTABAD

Service Appeal No. 5793/2020

P-24

Date of Institution ... 03.06.2020

Date of Decision ... 22.07.2022

Khani Zaman S/O Norani Village Hamsharian Post Office Bherkund
Tehsil and District Mansehra. Ex-PET GMS, Manoor.

... (Appellant)

VERSUS

Secretary, Elementary and Secondary Education Department
Peshawar and two others.

... (Respondents)

MR. MUHAMMAD ARSHAD KHAN TANOLI,
Advocate

--- For appellant.

MR. KABIRULLAH KHATTAK,
Additional Advocate General

--- For respondents.

MR. KALIM ARSHAD KHAN
MR. SALAH-UD-DIN

CHAIRMAN
MEMBER (JUDICIAL)

CONSOLIDATED JUDGMENT:

Muhammad Arshad Khan Tanoli
Advocate
Office # 33 Jinnah Plaza Adjacent
Camp Court Abbottabad

SALAH-UD-DIN, MEMBER:- Our this judgment shall dispose of instant as well as connected Service Appeal bearing No. 5892/2020 titled "Ejaz Ahmad Versus Secretary, Elementary and Secondary Education Department Peshawar and two others", Service Appeal bearing No. 8634/2020 titled "Rafaqat Ali Versus Secretary, Elementary and Secondary Education Department Peshawar and two others" and Service Appeal bearing No. 8635/2020 titled "Zardad Khan Versus Secretary, Elementary and Secondary Education Department Peshawar and two others", as common question of law and facts are involved in all the 04 appeals.

2. Briefly stated the averments as raised by the appellants in their respective service appeals are that the appellant

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

namely Khani Zaman was appointed as PET, while rest of the appellants were appointed as CTs vide appointment orders issued in the year 1996. The appellants assumed the charge of their posts and started performing of their duties, however the services of the appellant namely Khani Zaman was dispensed with vide termination order dated 13.02.1997, while services of rest of the appellants were dispensed with vide termination order dated 07.07.1997. Upon promulgation of Khyber Pakhtunkhwa Sacked Employees (Appointment) Act, 2012, the appellants were re-appointed on their posts. They assumed the charge of their posts and started performing of their duties but in the meanwhile, competent Authority issued them show-cause notices and their appointment orders were withdrawn vide separate impugned orders. The departmental appeals of the appellants remained unfruitful, therefore, they have now approached this Tribunal through filing of the service appeals for redressal of their grievance.

3. Respondents contested the appeals by way of submitting comments, wherein they refuted the assertions made by the appellants in their appeals.

4. Learned counsel for the appellants has contended that the appellants were initially appointed on their respective posts in the year 1996 and they had performed their duties but later on their services were dispensed with vide termination orders dated 13.02.1997 and 07.07.1997; that the documents and service record of the appellants were thoroughly checked by the scrutiny committee and recommended them for re-appointment on their posts, where-after the appointment orders of the appellants were issued by the Departmental Selection Committee by observing all legal and codal formalities; that the competent Authority, while acting in a haphazard manners, has withdrawn the appointment orders of the appellant without any legal justification; that no proper inquiry was conducted in the matter and the mandatory provisions of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 were not complied with in the inquiry

ATTESTED

EXAMINED
Khyber Pakhtunkhwa
Service Tribunal
Peshawar


proceedings. In the last he requested that the impugned orders being wrong and illegal may be set-aside and the appointment orders of the appellants may be restored with all back benefits.

5. On the other hand, learned Additional Advocate General for the respondents has argued that the appellants were not at all initially appointed in the year 1996, however they inserted their names in the respective termination orders through tempering in the same and produced fake/bogus documents for procuring their appointments; that a detailed inquiry was conducted in the matter and it was proved that the names of the appellants were inserted in the respective termination orders by way of tempering in the same; that the appellants were provided ample opportunity of self defense as well as personal hearing but they were unable to show any cogent document regarding their appointments in the year 1996. In the last he requested that the impugned orders may be kept intact and the appeals in hand may be dismissed with costs.

6. We have heard arguments of learned counsel for the parties and have perused the record.

7. A perusal of the record would show that a scrutiny committee was constituted for scrutinizing the documents of the appellants as well as others for determining of their eligibility for appointment in light of the Sacked Employees Act, 2012. The scrutiny committee recommended the appellants for their appointment and has mentioned in its report that the scrutiny committee checked the record of all the candidates one by one. A meeting of the District Selection Committee was then held under the Chairmanship of DEO (Male) Mansehra, wherein the appellants were recommended for appointment on their respective posts and thus their appointment Notifications were issued by the competent Authority. The minutes of Departmental Selection Committee are available on the record, wherein it is mentioned that the committee had made thorough deliberations and had perused the record minutely. The appellants were, however later on issued show-cause notices on the ground that upon

ATTESTED


EXAMINER
Chyler D. Khattak
Service Tribunal
Mansehra

verification, fake and fabricated documents were found in their service record. Final show-cause notices were then issued to the appellants without mentioning therein that regular inquiry was dispensed with. It appears that the main allegations against the appellants were that their names had been inserted in the respective termination orders by way of tempering. The question of tempering being factual in nature was required to have been ascertained through a regular inquiry but the same has not been done. The departmental Authority was required to have adduced evidence in support of the allegations against the appellants by providing them opportunity of cross-examination. Although it is mentioned in the impugned Notifications that proceedings were conducted under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 but the mandatory provisions of the same were not complied with. In these circumstances, conducting of de-novo inquiry in the matter is necessary for reaching a just and right conclusion.

8. In view of the above discussion, the appeal in hand as well as connected Service Appeal bearing No. 5892/2020 titled "Ejaz Ahmad Versus Secretary, Elementary and Secondary Education Department Peshawar and two others", Service Appeal bearing No. 8634/2020 titled "Rafaqat Ali Versus Secretary, Elementary and Secondary Education Department Peshawar and two others" and Service Appeal bearing No. 8635/2020 titled "Zardad Khan Versus Secretary, Elementary and Secondary Education Department Peshawar and two others" are allowed by setting-aside the impugned orders and the appellants are reinstated in service for the purpose of de-novo inquiry. The departmental Authority shall conduct de-novo inquiry strictly in accordance with the relevant law/rules within a period of 90 days of receipt of copy of this judgment and the result be intimated to this Tribunal through Registrar. Needless to mention that the appellants shall be associated with the inquiry proceedings and fair opportunity be provided to them to defend themselves. Keeping in view peculiar facts and circumstances of the

ATTESTED

KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR

cases, the issue of salary and back benefits shall be subject to outcome of de-novo inquiry. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
22.07.2022

(SALAH-UD-DIN)
MEMBER (JUDICIAL)
CAMP COURT ABBOTTABAD

(KALIM ARSHAD KHAN)
CHAIRMAN
CAMP COURT ABBOTTABAD

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RHYDER PUNJAB
Service Tribunal
LAHORE

Date of presentation of Apph... 03/10/22
Number of Words... 2000
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Dep... 4/-
Total... 26/-
Name of...
Date of... 03/10/22
Date of... 03/10/22

Annex - E ① P-29

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA
KHYBER PAKHTUNKHWA
PESHAWAR



Service appeal No. 8634 of 2020

Rafaqat Ali son of Khani Zaman r/o village Kanshian P/O
Balakot Tehsil Balakot District Mansehra, Ex CT GHS Baila
Manoor District Mansehra.....Appellant

Versus

Diary No. 6315
Date 08/7/2020

- 1) Secretary, Elementary and Secondary Education
Department Peshawar
- 2) Director, Elementary and Secondary Education
Department Peshawar.
- 3) District Education Officer (Male)
Mansehra..... Respondents

APPEAL UNDER SECTION 4 OF KPK SERVICE
TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED
NOTIFICATION NO 2012-25 DATED 28-02-2020
WHEREBY RESPONDENT NO 03 HAS WITHDRAWN
THE APPOINTMENT NOTIFICATION OF THE
APPELLANT VIDE ENDST NO 10268-74 DATED
20.06.2019 AND AGAINST NOT TAKING ANY ACTION
ON THE DEPARTMENTAL APPEAL OF THE
APPELLANT WITHIN STATUTORY PERIOD OF NINETY
(90) DAYS.

PRAYER:-

On acceptance of the appeal, the impugned
NOTIFICATION NO. 2012-25 Dated 28-02-2020 may
graciously be set-aside being illegal, void, without
Lawful authority, of having no legal effect and
factually erroneous and appellant be reinstated into
service as CT with all back benefits and other
admissible allowances as per law on the subject and
any other order as may deem fit and appropriate in
the fact and circumstances of the case.

Respectfully Sheweth:-

- 1) That, initially, appellant was appointed against
vacant post of CT at GMS SOKAI, Mansehra vide
appointment Order Endst: No.6050-58 Dated
24.04.1996 by Competent Authority (Respondent No
03)

Filed to-day

Registrar

27/7/2020

Re-submitted to-day
and filed.

Registrar

27/7/2020

ATTESTED

[Signature]
Khyber Pakhtunkhwa
Service Tribunal

ORDER
22.07.2022



Mr. Muhammad Arshad Khan Tanoli, Advocate for the appellant present and submitted fresh Wakalatnama on behalf of the appellant, which is placed on file. Mr. Hamid Mansoor, Assistant alongwith Mr. Kabirullah Khattak, Additional Advocate General for the respondents present. Arguments heard and record perused.

Vide our detailed judgment of today, placed on file of Service Appeal bearing No. 5793/2020 titled "Khani Zaman Versus Secretary, Elementary and Secondary Education Department Peshawar and two others", the appeal in hand is allowed by setting-aside the impugned orders and the appellant is reinstated in service for the purpose of de-novo inquiry. The departmental Authority shall conduct de-novo inquiry strictly in accordance with the relevant law/rules within a period of 90 days of receipt of copy of this judgment and the result be intimated to this Tribunal through Registrar. Needless to mention that the appellant shall be associated with the inquiry proceedings and fair opportunity be provided to him to defend himself. Keeping in view peculiar facts and circumstances of the case, the issue of salary and back benefits shall be subject to outcome of de-novo inquiry. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
22.07.2022

(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad

(Salah-Ud-Din)
Member (Judicial)
Camp Court Abbottabad

Date of Presentation of Application 03-10-22
Number of Words 800
Copying Fee 10/-
Fees 5/-
Total 15/-
Name of Copyist -
Date of Completion of Copy 03-10-22
Date of Delivery of Copy 03-10-22

Certified to be true copy

REGISTRAR
Khyber Pakhtunkhwa
Service Tribunal
Peshawar



OFFICE OF THE DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

Phone # 0997-382271

Fax # 0997-382244

E-mail Address: edoedu_mansehra@yahoo.com

P-31

Annex-F

1. Whereas Mr. Rafaqat Ali CT was reappointed and posted at GHS Bela Manoor District Mansehra under sacked Employee Act 2012 vide this office vide Endst No. 10268-74 dated 20-06-2019. On the basis of documents provided by you as per direction of Honourable Peshawar High Court Abbottabad Bench vide his judgment dated 03-04-2018.
2. Whereas according to the Terms and Condition NO.20 of the appointment order is that "their documents if found fake/bogus at any stage, their appointment order shall be withdrawn and legal action be taken against him."
3. Whereas after issuing of appointment order the competent authority sent a letter to the Head Master GMS Sokal Mansehra for re-verification of record of Mr. Rafaqat Ali s/o Khani Zaman Ex- CT GMS Sokal vide letter No.10702 dated 25-06-2019. After verification of your documents/service record, fake and fabricated documents have been found in your service record.
4. Whereas, as per report of the Head Master GMS Sokal vide dated 07-10-2019 with the remarks that "Mr. Rafaqat Ali CT has never ever been appointed vide Endst No.6050-59 dated 24-04-1996 at GMS Sokal, acquaintance role, attendance register, log book and appointment order file were checked no such record was found of the said person in our school for the period 1996-1997.
5. Whereupon the initial inquiry conducted by the officer on 06-08-2019, the said committee submitted report to this office on 12-08-2019, with the remarks that Mr. Rafaqat Ali tempered/forged his name at serial No.126 in Termination order vide Endst 16052-189 dated 07-07-1996 and no record was found in school record the case is fake, so the appointment order may be withdrawn. It shows that you have committed misconduct /illegality thus violated E&D rule, 2011.
6. WHEREAS as per inquiry report dated 12-08-2019, a showcause notice was issued to concerned vide this office No. 16333 dated 07-10-2019, but Mr. Rafaqat Ali Failed to reply Final show cause notice issued vide Endst No.17698 dated 07-11-2019, and received reply of showcause on 13-11-2019
7. Whereas, he was called for personal hearing vide this office No.18160-61 dated 25-11-2019, but he did not attend the personal hearing before the Competent Authority. Whereas he was again called for personal hearing on 30-01-2020, while attending the office of undersigned on 15-02-2020 and heard.
8. WHEREAS the competent authority District Education Officer (M) E&SE Mansehra after having considered the charges and evidence on record, perusal of reply of show cause notice & Personal hearing, is of the view that the charges against the accused Teacher have been proved. Therefore the appointment order vide Endst No.10268-74 dated 20-06-2019 in r/o Mr. Rafaqat Ali CT GHS Bela Manoor Mansehra is hereby **WITHDRAWN** from the date of issue of re-appointment order (Ab-Initio Withdrawn) with immediate effect.
9. Whereas the Appellant filed Service Appeal bearing No. 3634/2020, before the Honourable Service Tribunal Peshawar which was allowed on 22-07-2022 with the remarks that "The appellant is reinstated in service for the purpose of denovo inquiry, the departmental authority shall conduct denovo inquiry strickly accordance with the relevant law/rules within the period of 90 days of receipt of the judgment and the result may be intimated to this Tribunal through Registrar and fair opportunity be provided to him to defend himself, salary and back benefits shall be subject to outcome of denovo inquiry.
10. Whereas Mr. Rafaqat Ali CT re-instated in service for the purpose of denovo inquiry only, and posted at GHS Baila Manoor as per direction of Honourable Service Tribunal Peshawar vide his judgment dated 22-07-2022.

DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

Endst: No. 10101-05 Dated 17/12/2022

Copy forwarded for information to the:

1. Registrar Honourable Service Tribunal Khyber Pakhtun Khawa Peshawar In service Appeal No.3634/2020 titled as Rafaqat Ali Vs Govt of KPK.
2. Director E&SE Khyber Pakhtunkhwa Peshawar.
3. District Monitoring Officer (IMU) Mansehra.
4. District Account Officer Mansehra.
5. Head Master concerned.
6. Mr. Rafaqat Ali Residence of village kanshian P/o Kanshian, Tehsil Balakot District Mansehra.
Office File.

Sd/-
DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

Munammad Arshad Khan Iano
Advocate Supreme Court of Pakistan
Office # 33 Jinnah Plaza Adjacent to
Str. Bar Abbottabad

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Annex 5

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رجسٹر حاضری مدرسین اورنگ آباد کی سرحدی تحصیل

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اساتذہ کرام کی فہرست
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رخصت جاری کارکنان

P. 42

نہایت صبر - حری - ای - او میں صاحب مائتدہ

Annex-H P-46

درخواست میرا دستاویز جسٹس جسٹس
ڈی - او - او انٹرنیٹ رپورٹ

صاحب عالی، درخواستیں زیر عنوان ہے

1. میرا نام آ - کانٹریبیوٹرز ایسوسی ایشن 1994

سے کوئی ای اور اسٹیل کے 1997 سے نووری سے

خارج کر دیا گیا

2. میرا نام نے اس غیر قانونی اور رگ و گھاسٹس جسٹس جسٹس کیا

اور عدالت سے نام گورنر 2016 کو نووری

میرا حال کر دیا گیا اور کوئی ای کو 2020 سے نووری

سے خارج کر دیا گیا - جس کے خلاف جسٹس جسٹس جسٹس

سے جسٹس جسٹس جسٹس جسٹس 17/12 کو جسٹس جسٹس

انٹرنیٹ ماہنامہ کوئی ای نووری سے حال کر دیا گیا

3. میرا نام 23 سے اب کوئی ای کر رہا ہے - اور جسٹس

نے اسے تھ کر انٹرنیٹ کے اس سے لیم کر دی ہے

4. میرا نام جسٹس اس انٹرنیٹ کے اور اسے رکھا ہے

5. میرا نام جسٹس جسٹس جسٹس جسٹس

اور اسے جسٹس جسٹس جسٹس جسٹس

Munir Ahmad Arshad Khan Janjani
Advocate Supreme Court of Pakistan
Office # 33 Jinnah Plaza Adjacent
District Bar Abbottabad

صاحب عالی

Annex - 1

خدمتِ حساب ڈسٹرکٹ ایجوکیشن آفیسر (د. ۵۰۵) صاحبِ مزدورہ صاحبہ

حساب نمبر: P-47

گزارش کی جاتی ہے کہ سائل رفاقت سے لیور سیکلڈ ایجوکیشنل گورنمنٹ چھائی سکول

سیدہ سوزیس عرصہ ۱۶.۱۵.۲۰۲۰ سے لے کر ٹی۔ یو۔ ایٹ پر تعینات ہے

اور سائل کی عرصہ سے ایک ڈیپارٹمنٹل انٹرویو پر بھی لکھی جو کہ سکول
نصوح کرنا داخل دفتر ہو چکی ہے سائل ایک عزیز آدمی سے اور اپنی

نہی کی گفتگو کرتے وقت فریڈ داہم سے اور ان حالت میں گزارا کرنا
مشور ہے اور اس پر تمام ریکارڈ موجود ہے

پسند گزارش کی جاتی ہے کہ سائل کی عرصہ ۱۶.۱۵.۲۰۲۰ تک خواہ نہیں ہوگی
سائل کی انٹرویو خانہ کی نظر ثانی کی جائے اور سائل کی صاحبانہ خواہ

عسر گزارش ہوگی

سائل رفاقت سے آئے گورنمنٹ چھائی سکول سیدہ سوزیس

29/6 2024

0343, 9788981

Muhammad Arshad Khan Iano
Advocate Supreme Court of Pakistan
Office # 33, Jinnah Plaza Adjacent
Distt. Pafk Abbottabad

خدمت حساب ڈسٹرکٹ ایجوکیشن آفیسر، (DEO) کراچی، سندھ، پاکستان

حداصلی

گزارش کی جاتی ہے کہ سائنس رفاقت سے آئی سی ڈی ایس ایس کے گورنمنٹ ہائی اسکول کراچی کی ایک ڈیپارٹمنٹل انوائسری میں ایسی ہی تھی جو کہ سیکر جو کر دیا گیا ہے۔
جو کہ ارد (M.A. فارسی) کے پورے تھے۔

سائنس سے بھی کسی درجہ میں گزار دی ہیں کہ سائنس ایک گریجویٹ اور
اور 18 ماہ سے لیتے تھوڑے سے سہولت کر رہا ہے

سائنس کی جاتی ہے کہ سائنس کی انوائسری میں کسی گورنمنٹ ہائی اسکول کراچی
اور سائنس کی سہولت تھوڑے سے سہولت کر رہا ہے

میں - وزارت سائنس

سائنس رفاقت سے آئی سی ڈی ایس ایس کے گورنمنٹ ہائی اسکول کراچی

23/7/2034

0343.9788981

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Muhammad Arshad Khan Iano
Advocate Supreme Court of Pakistan
Office # 33 Jinnah Plaza Adjacent
Distt Bar Abbottabad

کورٹ فیس

وکالت نامہ

The Chairman KPK Service Tribunal Court ^{(Sic) Peshawar} بعدالت

Rafiqat — Mr. District Education نام: عنوان

Appellant منجانب:

نوعیت مقدمہ:

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آن مقام

Abdullah N. Arshad Khan Tanoli Adv. H.C. Peshawar

کو وکیل مقرر کر کے افرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کال اختیار ہوگا نیز وکیل

صاحب موصوف کو کرنے رضی نامہ تقرر ^{Advocate Supreme Court of Pakistan} فیصلہ ^{District Bar Abbottabad} اقبال دعویٰ اور بصورت دیگر ڈگری

کرانے اجراء وصولی چیک روپیہ ^{Advocate Supreme Court of Pakistan} کی وصولی اور ^{District Bar Abbottabad} پر دستخط کرنے کا اختیار ہوگا اور بصورت

ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی

بجائے تقرر کا اختیار بھی ہوگا و صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا

ساختہ پرداختہ مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے

مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہوا

حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں

کوئی جزو بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست برادر

استجارت نالاش بصیغہ مفلسی کے دائر کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کیا تاکہ سند رہے۔

القوم:
Accept

M. Ishaq Khan Tanoli
Adv. H.C. Peshawar

Accept
Abdullah N. Arshad Khan Tanoli
Adv. H.C. Peshawar

at Peshawar