

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 457/2024

Fazal Subhan R/O District Mohmand **(Appellant)**

Versus

Director E&SE, Khyber Pakhtunkhwa & Others **(Respondents)**

INDEX

S.NO	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGE
1	Parawise Comments	1-4
2	Authority letter		5
3	Affidavit		6
4	Copy of the show cause notice,	A	7
5	Copy of staff attendance register,	B	8-12
6	Copy of SDEO report	C	13-14
7	Copy of the dispatched register and withdrawal order	D and E	15-17
8	Copy of the attendance of personal hearing	F	18-19
9	Transferred/adjustment order	G	20-21
10	Copy of the application	H	22


(Mst. Sartiina Altaf)
Director

E&SE, Khyber Pakhtunkhwa

06-08-21

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 457/2024

Fazal Subhan R/O District Mohmand **(Appellant)**

Versus

Director E&SE, Khyber Pakhtunkhwa & Others **(Respondents)**

Parawise Comments on behalf of the Respondents No.1 and 2. Khyber Pakhtunkhwa
Service Tribunal

Respectfully Sheweith.

Diary No. 14669

Dated 05-08-2024

PRELIMINARY OBJECTIONS.

1. That the Appellant has no cause of action, locus standi to file the instant appeal.
2. That the answering respondents being a Competent Authority have acted in accordance with law by observing all the codal formalities and while doing so no rights of the Appellant has ever been violated, hence the Appellant is not an aggrieved person within the meaning of Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974.
3. That the Appellant has not come to this Honorable Tribunal with clean hands.
4. That the Appellant has concealed material facts from the Honorable Tribunal.
5. That the instant appeal is bad for misjoinder and non-joinder of necessary parties, hence liable to be dismissed.
6. That the conduct of the Appellant estopped/preclude himself to bring the instant appeal.
7. That the instant appeal is based on malafide intentions aimed at exerting illegal pressure on the answering respondent to gain unlawful benefits.

ON FACTS:

1. **That** Para No.1 of the Appeal pertains to the service records of the Appellant, hence, need no comments.
2. **That** Para No. 2 of the Appeal is correct, hence need no comments.
3. That para-3 is correct to the extent that the leave without pay was granted to the Appellant w.e.f. 01-11-2021 to 31-10-2022, however, after completion of the leave period, the Appellant failed to report to his concerned duty station which substantiate his unwillingness to perform his official duty. The Appellant's absence from duty led to proceedings under the E&D Rules, 2011, including a show cause notice issued on dated: 24-02-2023. Similarly, an opportunity of personal hearing was also provided to the appellant on dated: 25-03-2023 **(Copy of the show cause notice, staff attendance register, and SDEO report are attached as annexure A, B and C)**
4. Incorrect, hence denied. As elucidated in the preceding para 3, it is incorrect that the Appellant has continued his official duty in the concerned school after the

completion of leave without pay period rather the Appellant is trying to mislead the Honorable Tribunal by taking refuge under the presumption of his transfer process. In fact, the Appellant fails to resume his duty after the completion of leave without pay period (EOL) as evident from the available record and thus the respondents duly proceeded against the Appellant under the E&D Rules, 2011. Moreover, it is noteworthy that the dispatched number of the NOC document provided by the appellant with this appeal, doesn't match with the dispatched number of the dispatch register of the respondent's office. And thus, through the same fake NOC document the appellant deliberately kept ignored the respondent No. 1 and managed to get a notification of his transfer. However, it is pertinent to mention over here that the transfer/adjustment notification dated 28-03-2023 through which the appellant managed his transfer from District Mohmand to District Peshawar was withdrawn by the respondent No.1, i.e., Director E&SE, Khyber Pakhtunkhwa vide order dated:12-04-2024, to the extent of Appellant ab-initio. **(Copy of the dispatched register and copy of the withdrawal order are attached as annexure D and E)**

5. As elucidated in the preceding para, and further to state that the Appellant's absence from duty led to proceedings under the E&D Rules, 2011, including a show cause notice issued on dated: 24-02-2023. Similarly, an opportunity of personal hearing was also provided to the appellant on dated: 25-03-2023 and during the personal hearing the appellant admitted his inability to perform his duty in the concerned school. **(Copy of the attendance of personal hearing is attached as annexure F).**
6. The plea of the appellant as composed in para-6 is incorrect, hence denied. The Appellant not only managed to throw dust in the eyes of the respondent No. 1 and illegally managed his transfer from District Mohmand to Peshawar but also completely ignored and had not taken in loop the respondent No.2 in the process. Moreover, the dispatched number of the NOC document provided by the appellant with this appeal also doesn't match with the Dispatched Register record of the respondent No. 2. Furthermore, the District Education Officer Peshawar has duly asked from the Appellant to provide relieving certificate from respondent No. 2, and then the Appellant approached the respondent No.2 for the provision of the relieving certificate. Meanwhile, the respondent No. 2, has already issued a show cause notice to the appellant regarding his willful absence which was even responded by the appellant. Additionally, during the personal hearing the Appellant admitted his inability to perform his duty in the concerned school which established the fact that the Appellant was absent. Consequently, the respondents after following the codal formalities removed the Appellant from service.
7. Incorrect, hence denied. The Appellant is trying to mislead the Honorable Tribunal by manipulating the facts. In fact, the respondents issued the show

cause notice order on dated: 24-02-2023 while the appellant transfer order was issued on dated: 29-03-2023, which is almost a month later of the show cause notice. Thus, the plea of the appellant in the first part of the para is totally against the facts. Moreover, during the personal hearing the Appellant confessed that he was unable to perform his duty in the concerned school, make him accountable to be proceeded in accordance with law **(See Annexure A and transferred order as annex G).**

8. It is incorrect to suggest that the Appellant has time and again approached the respondents for obtaining relieving certificate because as per the application of the Appellant, which is attached with the appeal, he approached the respondents on dated 28-12-2023 which is almost 8 months later of his removal from service, and which indicates that how he was interested in performing his duty. Similarly, there is nothing available on record which could substantiate that after his transfer/adjustment to District Peshawar on dated 29-03-2023, the appellant performed his duty in the concerned school. **(Copy of the application is attached as annexure H).**
9. Incorrect, hence denied. The Appellant failed to exhaust the adequate remedy of the competent forum within the statutory period, hence he has no right to bring the instant appeal before the Honorable Tribunal.
10. The Appellant is not an aggrieved person within the meaning of section 4 of the service Tribunal Act 1974, hence has no right to bring the instant appeal.

ON GROUNDS:

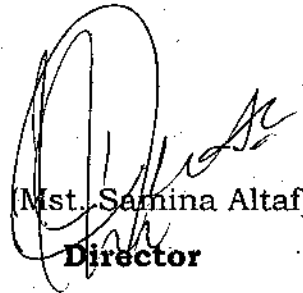
- A. Incorrect, hence denied. That the answering respondents being bound by law has treated the Appellant in accordance with law by issuing order dated: 08-04-2023 and while doing so no provision of any applicable law has ever been violated.
- B. Incorrect, hence denied. The detailed reply to has already been given in the above Para's.
- C. Incorrect, hence denied. That the answering respondents being bound by law has treated the Appellant in accordance with law and while doing so no provision of any law for the time being enforce, has ever been violated.
- D. Incorrect, hence denied. The Appellant has been treated in accordance with law and while doing so, there is no discrimination on the part of the respondents rather the respondents has acted validly and treated the Appellant in accordance with law.
- E. Incorrect, hence denied. The plea of the Appellant under Para **E** has no footing under the law and thus not maintainable.
- F. Incorrect, hence denied. That the answering respondents being bound by law has treated the Appellant in accordance with law and while doing so no provision of the constitution has ever been violated.
- G. Incorrect, hence denied. The detailed reply has already been given in the above para.

- H. Incorrect, hence denied. That the answering respondents being bound by law has duly proceeded against the Appellant under the E&D Rules, 2011 and while doing so all the codal formalities has been duly followed.
- I. Incorrect, hence denied. The detailed reply has already been given in the above Para's.
- J. Incorrect, hence denied. The detailed reply has already been given in the above Para's.
- K. The respondents seek permission to present other grounds at the time of hearing of the instant appeal.

PRAY:

Keeping in view the above stated facts and legal position, it is, therefore, humbly prayed that the instant appeal of the Appellant may kindly be dismissed in favor of the respondents with cost.

Respondent No.1



(Mst. Samina Altaf)
Director

Elementary and Secondary Education,
Government of Khyber Pakhtunkhwa

Respondent No.2



(Mr. Sheraz Ahmad)

District Education Officer (M)

Mohmand

5

AUTHORITY LETTER

I, Sheraz Ahmad, District Education Officer Mohmand (M), do hereby authorized Mr. Javed Khan, CT and Legal representative of this office for submission of comments/reply in Service appeal No. 457/2024 case Titled Fazal Subhan Ex-PST VS Director (E&SE), Khyber Pakhtunkhwa and others, hence and authority letter is hereby issued.



(Sheraz Ahmad)

District Education Officer (M)

Mohmand

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 457/2024

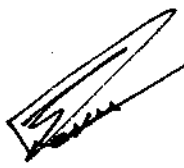
Fazal Subhan R/O District Mohmand **(Appellant)**

Versus

Director E&SE, Khyber Pakhtunkhwa & Others **(Respondents)**

AFFIDAVIT

I, Sheraz Ahmad, District Education Officer Mohmand (M), do hereby solemnly affirm and declare that the contents of the instant comments/ reply are true and correct to the best of my knowledge & belief and nothing has been concealed from the ambit of this Honorable Tribunal.



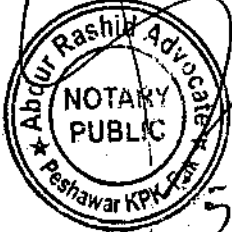
DEPONENT

(Sheraz Ahmad)

District Education Officer (M)

Mohmand

*There is no co-partie
and no cost against
the respondents. gmd*

ATTESTED

5/8/2024



OFFICE OF THE DISTRICT EDUCATION OFFICER
DISTRICT MOHMAND

Email:- deomohmand@gmail.com



To be substituted with Even No & Date

SHOW CAUSE NOTICE

I, LIAQAT ALI, District Education Officer (Male) Mohmand as Competent Authority under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 do hereby serve upon you, Mr Fazli Subhan PST GPS Manzari China Tehsil Baizai Mohmand this show cause notice as follow:

- 1) That as per DCMA of Education Monitoring Authority Mohmand report for the month of August 2022, you have been found absent from your school duty since 1/11/2021 to 9/01/ 2023 without prior permission/approval of leave.
- 2) That the then DEO (M) Mohmand had granted you EOL w.e.f. 1/11/2021 to 31/10/2022 (365 days) vide this office No 8142-45 dated 26/11/2021.
- 3) That after the expiry of the EOL, you did not report to your school as per report of the SDEO concerned.
- 4) That you are guilty of professional dishonesty, abetment and inefficiency under the Rule-3(a) of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011.
- 5) In terms of rule 5(1) (a) of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, I as Competent Authority dispense with the inquiry and serve you with a show cause notice under rule 7 of the rules ibid.

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

As a result, thereof, I, as the Competent Authority, have tentatively decided to proceed against you under the mentioned rules. You are, therefore, required to show cause as to why penalty under Rule-4 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011 should not be imposed upon you and also intimate whether you desire to be heard in person.

If no reply to this office is received within 07 days of its delivery, it shall be presumed that you have no defense to put in and, in that case, ex-parte action shall be taken against you under the rules ibid.

(LIAQAT ALI)
District Education Officer
(Male) Mohmand

Mr. Fazli Subhan PST GPS Manzari China Tehsil Baizai

Endst No 7091-96/ Etab (Pry)

Dated 24/02/2023

Copy forwarded to the:

- 1) Director of Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
- 2) DMO Education Monitoring Authority Mohmand.
- 3) SDEO concerned with the direction to deliver this notice to the said official with acknowledgement on the office copy under intimation to this office and do the needful as per rules.
- 4) Official concerned
- 5) Office Copy.

ATTESTED

24/2/2023
District Education Officer
(Male) Mohmand

⑧

Ammon B
 استانی پلاننگ و ایگریکچر ڈیپارٹمنٹ
 اسلامیہ یونیورسٹی، سوات
 2023

2	Head										
3	Head										
4	Head										
5	Head										
6	Head										
7	Head										
8	Head										
9	Head										
10	Head										
11	Head										
12	Head										
13	Head										
14	Head										
15	Head										
16	Head										
17	Head										
18	Head										
19	Head										
20	Head										
21	Head										
22	Head										
23	Head										
24	Head										
25	Head										
26	Head										
27	Head										
28	Head										
29	Head										
30	Head										
31	Head										
32	Head										
33	Head										
34	Head										
35	Head										
36	Head										
37	Head										
38	Head										
39	Head										
40	Head										
41	Head										
42	Head										
43	Head										
44	Head										
45	Head										
46	Head										
47	Head										
48	Head										
49	Head										
50	Head										
51	Head										
52	Head										
53	Head										
54	Head										
55	Head										
56	Head										
57	Head										
58	Head										
59	Head										
60	Head										

امین ایف

HEAD MASTER
 DISTRICT M...
 2023

گورنمنٹ ہیر ایئر لائنز کونسل منٹری ویلنٹین مینڈا
 بابت ماہ فروری 2023ء

ریجنل حاضر کی ملازمین

غلام اسماعیل / عبدالرحمن
 چوکھڑا

تحریر (شعبہ ق)
 PST

تاریخ	آمد	دستخط	رہائی	دستخط	آمد	دستخط	رہائی	دستخط	آمد	دستخط	رہائی	دستخط
1				P	8:30	P	1:30					
2				P	8:30	P	1:30					
3				P	8:30	P	12:00					
4				P	8:30	P	1:30					
5				Sunday - Sunday - Sunday								
6				P	8:30	P	1:30					
7				P	8:30	P	1:30					
8				P	8:30	P	1:30					
9				P	8:30	P	1:30					
10				P	8:30	P	12:00					
11				P	8:30	P	1:30					
12				Sunday - Sunday - Sunday								
13				P	8:30	P	1:30					
14				P	8:30	P	1:30					
15				P	8:30	P	1:30					
16				P	8:30	P	1:30					
17				P	8:30	P	12:00					
18				P	8:30	P	1:30					
19				Sunday - Sunday - Sunday								
20				P	8:30	P	1:30					
21				P	8:30	P	1:30					
22				P	8:30	P	1:30					
23				P	8:30	P	1:30					
24				P	8:30	P	1:30					
25				P	8:30	P	1:30					
26				Sunday - Sunday - Sunday								
27				P	8:30	P	1:30					
28				P	8:30	P	1:30					
29				P	8:30	P	1:30					
30				P	8:30	P	12:00					
31												

~~2~~
 2
 18/02/2023

ADDED
 18/02/2023

REVIEWED
 18/02/2023

INTERGRS
 HEALTH
 Far Khata

MAR 24/2023

جناب

01%	01%	01%	01%	01%	01%	01%	01%	01%	01%	01%	01%	01%	01%	01%	01%	01%	01%	01%	01%	01%
21	20	19	18	17	16	15	14	13	12	11	10	9	8	7	6	5	4	3	2	1

BS per 9/4 H-T
 Report Mr. Faqir Subhan
 PST has not
 forward his duty
 station after
 completion of
 BOT

DISTRICT HEADQUARTERS
 DISTRICT HEADQUARTERS
 DISTRICT HEADQUARTERS

March - 2023

پست ڈسٹرکٹ ہیڈ کوارٹر

Annex - B
 10
 District Headquarter
 District Headquarter
 District Headquarter

محمد اشفاق				غلام اسحاق				محمد علی				نمبر
1ST				جولیار				1ST				عہدہ
دستخط	رہائی	دستخط	آد	دستخط	رہائی	دستخط	آد	دستخط	رہائی	دستخط	آد	تاریخ
				ARSENT				C.P.D TRAINING				1
				ARSENT				M.AU				2
				ARSENT				M.AU				3
				ARSENT				M.AU				4
				ARSENT				M.AU				5
SUNDAY				SUNDAY				SUNDAY				6
				ARSENT				M.AU				7
				ARSENT				M.AU				8
				ARSENT				M.AU				9
				ARSENT				M.AU				10
				ARSENT				M.AU				11
				ARSENT				M.AU				12
Sunday				Sunday				Sunday				13
				ARSENT				M.AU				14
				ARSENT				M.AU				15
				ARSENT				M.AU				16
				ARSENT				M.AU				17
				ARSENT				M.AU				18
				ARSENT				M.AU				19
Sunday				Sunday				Sunday				20
				ARSENT				TRAINING				21
				ARSENT				M.AU				22
				ARSENT				M.AU				23
				ARSENT				M.AU				24
				ARSENT				M.AU				25
				ARSENT				M.AU				26
Sunday				Sunday				Sunday				27
				ARSENT				M.AU				28
				ARSENT				M.AU				29
				ARSENT				M.AU				30
				ARSENT				M.AU				31

Handwritten signatures and notes in the bottom left corner, including names like 'Muzan' and 'Saqib'.

HEAD MASTER OPS
 Manzari China Atmar, Sheik
 District, Johmand

PS MANZARI CHENA MALAKI
 2022 DECEMBER

چیسٹر جاسری ملازمین
 بات نام

علاؤں کی اجازت				مزد ایشیاق				گھنٹوں کی				تاریخ
جو کبھی				PST				PST				عہدہ
دستخط	رہائی	دستخط	آہ	دستخط	رہائی	دستخط	آہ	دستخط	رہائی	دستخط	آہ	تاریخ
				CPD Training				CPD Training				1
				AAI 1:35	AAI 8:30			M. AL 12:00	M. AL 8:30			2
				AAI 1:35	AAI 8:30			M. AL 1:35	M. AL 8:30			3
Sunday				Sunday				Sunday				4
				AAI 1:35	AAI 8:30			Transfer system				5
				AAI 1:35	AAI 8:30			From 2 December				6
				AAI 1:35	AAI 8:30			100 Caps Attain RPL				7
				AAI 1:35	AAI 8:30							8
				AAI 12:00	AAI 8:30							9
				AAI 1:35	AAI 8:30							10
Sunday				Sunday				Sunday				11
				AAI 1:35	AAI 8:30							12
				AAI 1:35	AAI 8:30							13
				AAI 1:35	AAI 8:30							14
				AAI 1:35	AAI 8:30							15
				AAI 12:00	AAI 8:30							16
				AAI 1:35	AAI 8:30							17
Sunday				Sunday				Sunday				18
				AAI 1:35	AAI 8:30							19
				AAI 1:35	AAI 8:30							20
				AAI 1:35	AAI 8:30							21
				AAI 1:35	AAI 8:30							22
				AAI 12:00	AAI 8:30							23
				AAI 1:35	AAI 8:30							24
Sunday				Sunday				Sunday				25
												26
												27
												28
												29
												30
												31

APPROVED
 2022

HEAD MASTER GRS
 District Mohajana

NO 30

Report about Fazal Subhan Dated 29/3/23

Annex - C

13

From

ASDEO (M) primary
Circle khuizai /Baizai

To

SDEO(M) pry Upper subdivision Mohmand

PST.B-12

Subject: **REPORT ABOUT FAZAL SUBHAN PSHT GPS MANZARI CHINA MALANG**

Memo:

Respected the unsigned visited GPS Manzari Cheena Malang Baizai on 18/02/2023 and found Fazali Subhan Pst who was on long leave from 01/11/2021 to 31/10/2022. The said teacher has not reported his arrival to his ASDEO concerned. The said teacher continuously remained absent from his school DUTIES. Although he was informed telephonically so many times by ASDEO concerned to ensure his arrival but he fails to do so. It is therefore, recommended that his salary may please be stopped and disciplinary action may please be taken against him.

Arshad Khan

Arshad Khan ASDEO

29/3/23
ARSHAD KHAN (B-12)
ASDEO

Circle khuizai Baizai

No _____ Dated _____

forwarded to DEO (M) DIST II,
Mohmand for information
and necessary action please.

ATTESTED

Arshad Khan
29/3/2023

SDEO (M) Primary
Upper Mohmand

OFFICE OF THE SUB-DIVISIONAL EDUCATION OFFICER- MALE (PRIMARY)
UPPER MOHMAND

NO 1826

DATE: 30 / 3 / 2023

14

6

To

District Education Officer

(M) District Mohmand.

Subject: REPORT ABOUT MR. FAZAL SUBHAN PST BPS-12 GPS MANZARI
CHINA.MALANAG

With veneration reference to the subject noted above in the light of ASDEO male primary circle Khwezai/Baizai self-explanatory report, it is hereby stated that Mr. Fazal Subhan PST GPS Manzari China Malang was visited by ASDEO Concerned on 18/02/2023 and Mr. Fazal Subhan PST was found on long leave w.e.f 01/ 11/ 2021 to 31/10/2022. After completion the leave period Mr. Fazal Subhan has not informed his ASDEO about his arrival to his duty station. The said teacher remained absent continuously from his school duty. Instead of being telephonically informed so many times added by ASDEO concerned. Moreover he remained absent during the DCMA report as well. Entry of earned leave vide DEO (M) District Mohmand office order No: 8142-45 dated: 26/11/2021 has been made in original service book.

So this case is submitted to your good office for issuing him show cause notice and for further proceedings please.

SDEO- M Upper Mohmand
District, Mohmand

Endst: No. _____ Dated: _____ / _____ / 2023

Copy for of the following forwarded to;

1. DMO, EMA Mohmand
2. ASDEO's concerned
3. Office Record

ATTACHED

SDEO- M Upper Mohmand
District, Mohmand



APPLICATION FORM FOR INTER DISTRICT TRANSFER

- 1. Name of the Teacher/Applicant & District of Domicile. Fazal Subhan Mohmand
- 2. Designation/Post held with BPS PST BPS/2
- 3. Date of 1st Appointment 06-03-2003
- 4. Date of taking over charge (District of Present Post) 06-03-2013
- 5. Name of Present School of Posting GPS Manzari Chana Malang
- 6. Name of School where posting is required
 - 1. GPS no 2 Deen Babar
 - 2. Peshawar
 - 3. _____
- 7. Reason for Transfer Enemity
- 8. G.P. Fund No. 6047
- 9. Personal No. 357113
- 10. Numbers of C/leave (Availed) _____
- 11. Signature of Pri./HM/HT [Signature]
- 12. Signature of A.D.O in case of primary Teacher [Signature]

Head Master
G.P.S. Faiz Ali
Lahkar Killy
M. Agency
Mohmand Tribel District

I solemnly declare that all above information's from S.No. 1 to 12 are correct and nothing has been concealed.

Signature
Name of Applicant
N.I.C No.

[Signature]
Fazal Subhan
21406-7480713-1

CERTIFICATE BY THE RELIVEING EDO E&SE

- 1. Certified that I have no objection to the transfer of Mr. Mst: Fazal Subhan
- From GPS Manzari Chana Malang to GPS Deen Babar Peshawar
- 2. The following arrangement will be made by me for filing up the post of PST in case of transfer of Mr. Mst: Fazli Subhan

It is certified that.

- I. The study/Education of the students of the school will not suffer with proposed transfer
- II. The applicant is regular employee and not contract (Mention) Period. _____

Signature
Name of EDO E& SE
Endst. No 2531

[Signature]
District Education Officer
Mohmand Tribel District
Dated 17/01/2021

POST AVAILABILITY CERTIFICATE FO THE EXECUTIVE DISTRICT OFFICER ELEMENTRY & SECONDARY EDUCATION WHERE POST IS PROPOSED

I have no objection to the transfer of Mr. Mst. _____
Of against a vacant post of _____ at (Name of School) _____
Of District _____
I have also examined his/her relevant documents and found correct. It is also certified that no N.O.C has been issued to any person against this post.

Name of EDO E& SE _____ Signature _____
Endstt. No _____ / Dated _____ Stamp _____

Note;

The following documents duly attested should be provided.

- 1. Service Book (photo states)
- 2. 1st appointment order (original or attested photo copies by EDO E& SE)
- 3. Last pay Roll
- 4. Last Balance sheet of GP Fund.

[Signature]



17076
26/04/2023
ADP/PM
26/4/2023

(17)

**DIRECTORATE OF ELEMENTARY AND SECONDARY
EDUCATION KHYBER PAKHTUNKHWA.**

OFFICE ORDER

amex - E

The competent authority (Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar) is pleased to withdraw the transfer order being ab-initio to the extent of Serial No.3, namely Mr. Fazle Subhan PST (BPS-12) GPS Manzari Cheena Tehsil Baizai District Mohmand issued vide No. 1528-30 Dated: 28-03-2023 in the interest of public service.

DIRECTOR

Directorate of Elementary & Secondary Edu:
Khyber Pakhtunkhwa Peshawar.

Endst: No. 4049-54 /F.No./Posting/Transfer/Peshawar/Estab-1 Dated Peshawar 26 /04/2023.

Copy forwarded for information and necessary action to the:-

1. District Education Officer (Male) Mohmand.
2. District Education Officer (Male) Peshawar.
3. Section Officer (Primary-Male) Elementary & Secondary Education Department.
4. Principal Concerned.
5. Teacher Concerned.
6. P.A to Director Elementary & Secondary Education Local office.
7. P.A to Additional Director NMDs Local Directorate

ATTESTED

Assistant Director (Estab-1)

Directorate of Elementary & Secondary Edu:
Khyber Pakhtunkhwa Peshawar.



Annex - **F**

18

**OFFICE OF THE DISTRICT EDUCATION OFFICER
(MALE) DISTRICT MOHMAND**

Email : deomohmand@gmail.com



COMMITTEE FOR PERSONAL HEARING

The u/signed is pleased to constitute the following committee to conduct personal hearing of the officials mentioned below on 25/3/2023.

- | | |
|---|-------------|
| 1. Liaqat Ali DEO (Male) Mohmand | Chairman |
| 2. Iftikhar Ali SDEO (Male) Upper Mohmand | Member |
| 3. Muhammad Ali ADEO Estab: Primary | Member |
| 4. Amir shah Dealing Assistant Local Office | Facilitator |

Names of the Accused Officials

S.No	Name & Designation	Station of Duty
1	Zafar Hussain PSHT	GPS Gat Warsak Mohmand
2	Ibadat Shah PSHT	GPS Ghanam Shah
3	Niaz Ali TT	GPS Ghanam Shah
4	Fazli Subhan PST	GPS Manzari Cheena


(LIAQAT ALI)
**District Education Officer
(Male) Mohmand**

Endst No 7343-44 /PH

Dated 25/3/2023

Copy to the:

- 1) Officers/official concerned
- 2) Office copy.


District Education Officer 25/3/2023
(Male) Mohmand

ATTESTED

ATTENDANCE FOR PERSONAL HEARING IN R/O FAZLI SUBHAN PST GPS MANZARI CHINA MALANG TEHSIL BAIZAI DISTRICT MOHMAND

6

S/No:	Name	Desig	School	Signature
	Fazli Subhan	PST	Gps Manzari chinas Malang	<i>[Signature]</i>

تاریخ 26/11/22 سے 31/10/22 کو بغیر ہجرت کے رہا ہے۔
 11/11/2022 8/42 سے 45،
 میرا بیوی لیس منڈریں میں رہتا ہے۔ میں نے نا عاقبت لکھتے ہیں
 کہ وہاں سے وہاں نہیں کر سکتا۔ میں نے اس سے یہ دیکھا
 ہے کہ میں نے اس کے دوسرے کو لکھا ہے۔ اس سے اس کے
 ہر کوئی شکایت کا کوئی نہیں ہے۔
 25/3/23

[Signature]
 25/03/2023

True + Scan
 # 25-3-2023
 SDEO(M) PM. U.M

[Signature]
 25/03/2023

ATTESTED
[Signature]
 DEO(M) Mohmand
 25/3/2023

SE, 17

annex-6

20



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

NOTIFICATION

The services of following teachers are hereby placed at the disposal of District Education Officer (Male) Peshawar for further adjustment against the vacant post on his own pay & BPS in the interest of public service with immediate effect in the light of letter received from Govt: of Khyber Pakhtunkhwa Elementary & Secondary Education Department Civil secretariate Peshawar Signed by Section Officer (Primary/F) vide No SO(P/F)/E&SED/2-1/Minutes/IDT/2021 Dated: 27-03-2023.

S#	Name & Designation	From	To
1.	Muhammad Zaheer Ud din PST (BPS-12)	GPS No.1 Upper Chitral	Peshawar
2.	Mr. Tanveer Ahmad PST(BPS-12)	GPS Samagula Upper Chitral	Peshawar
3.	Mr. Fazle Subhan PST (BPS-12)	GPS Manzari Cheena Tehsil Baizai	Peshawar
4.	Mr. Ammad Ud Din PST (BPS-12)	GPS Khalil Swabi	Peshawar
5.	Mr. Arsalan Zahid CT (BPS-15)	GMS Kalito Malakand	Peshawar
6.	Muhammad Zafaran CT (BPS-15)	GMS Barbara Karak	Peshawar

TERMS & CONDITIONS

1. Charge Report should be submitted to all concerned.
2. No TA/ DA is allowed.
3. The District Education Officer concerned with the direction to check and verify their original Service Books and all documents before release of salary.
4. Their Seniority will be determined at the bottom of the seniority list of the PSTs/CTs in District Peshawar as per rules.

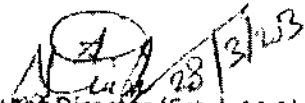
DIRECTOR

Elementary & Secondary Education
Khyber Pakhtunkhwa

Endst: No. 1505-30 F.No./Transfer/Posting/Peshawar Dated 28/03/2023

Copy forwarded to the:

1. Section Officer (Primary/F) w/r to his letter No. & Date as cited above.
2. District Education Officer (M) Peshawar.
3. District Accounts Officer Peshawar.
4. Mr. Hidayat Ullah focal person IEMIS Local Directorate.
5. Officers Concerned.


 Assistant Director (Estab M-1)
 Elementary & Secondary Education
 Khyber Pakhtunkhwa

Secretary (Training) Assistant Establishment Directorate
ATTESTED



G 18

21

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) PESHAWAR



OFFICE ORDER

In pursuance of the Notification issued by Director Elementary & Secondary Education Khyber Pakhtunkhwa, Endst: NO 1525-30, F.No./Transfer/Posting/Peshawar/ Dated: 28/03/2023, the following teachers transferred from various districts to district Peshawar, are hereby posted at stations mentioned against each name at their own BPS at against vacant posts, in the interest of public service, with immediate effect.

S.NO.	NAME	DESG.	FROM	ADJUSTED AT	REMARKS
1	MUHAMMAD ZAMEER	PST	GPS NO. 01, UPPER CHITRAL	GPS FIDA ABAD, PESHAWAR	APP
2	FANVEER AHMAD	PST	GPS SAMAGHULA, UPPER CHITRAL	GPS FIDA ABAD, PESHAWAR	APP
3	FAZLE SUBHAN	PST	GPS MANZARI CHEENA TENSIL, BAJZAI	GPS NO. 01, TELA DANA, INZARI PESHAWAR	APP
4	AMMAD UD DIN	PST	GPS KHALIL, SAIVABI	GPS NO. 01, FAQIR BUNR, PESHAWAR	APP

NOTE:

- i Charge Report should be submitted to all concerned after the verification of the transfer order from the undersigned.
- ii T.A/D.A is not allowed.

(SAJJAD AKHTAR IQBAL)
DISTRICT EDUCATION OFFICER
(MALE) PESHAWAR

Endst: No: 6273-83 /Estb: Primary/ Dated 29 /03/2023.

- 1 Copy of the above is forwarded for information and for necessary action to the
- 2 Accountant General Khyber Pakhtunkhwa Peshawar.
- 3 Director (E&SE) Khyber Pakhtunkhwa Peshawar w/r to the Office Order No. & Date Mentioned above.
- 4 P.S to Secretary Elementary & Secondary Education Khyber Pakhtunkhwa.
- 5 District Education Officer (Male) Concerned.
- 6 SDEO/ASDEO (Male) Concerned, Peshawar.
- 7 PA to District Education Officer (M) Peshawar.
- 8 Teachers concerned.
- 9 EMIS Local Office.

DY: DISTRICT EDUCATION OFFICER
(MALE) PESHAWAR

ATTESTED

گورنمنٹ ہائیڈرو پاور کورپوریشن (پبلک) لمیٹڈ

صوبائی (درخواست گزار کے متعلق Relating Contingent)

درخواست ذیل عنوان سے

عوامانہ گزارش ہے کہ کل ایسے ذریعے آٹھ 954 پوسٹ میں لگاتار کے
 اراکہ ذیلی، جوئی سر ایس ایم ڈی کے تعلق میں ایسی مداخلتیں ہوتی ہیں جو ان کے
 کے دفتر سے 2000 مائل رزک ڈائریکٹری ایجنسی کو درخواستیں
 مہیا کر کے جوئے مکتوبوں کے ذریعے 28/3/2023 تک
 کو متعلقہ ادارے مہیا کر کے درخواست گزار کے پاس
 لے کر آئے ہیں۔ اور ایسے ہی ایسی ایجنسیوں
 ذیلی شروع کیے، جسے بعد میں ان کے پاس سے
 Relating Contingent شروع کرنے کے لئے Show Cause
 نوٹس مہیا کر دیئے گئے۔ اس کے باوجود وہ
 مہیا کر دیئے گئے اور ان کی آڈیٹنگ
 مہیا کر دیئے گئے۔

ایسا ایسا ہے جو ان کے پاس سے
 کے لئے Relating Contingent کے لئے
 کے لئے ایسی ذیلی مہیا کر کے
 فوٹو اسٹوریج کے لئے مہیا کر کے
 مہیا کر کے Relating Contingent

المسعود
 28/12/2023

ATTESTED

ان کے
 محل کار
 (Pst.) GPS
 تہ بند

[Handwritten signature]