BEFORE THE HONORABLE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No 1112 /2022

Faris Khan.....Appellant

VERSUS

The Secretary (E&SE) & others ..... Respondents

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Appellant

Through:

(BISMILLAH JAN WAZIR)

&

(BASHIR KHAN WAZIR)

Advocate,

High Court, Peshawar

Dated:- 13.07.2022

BEFORE THE HONORABLE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No 1112 /2022

Faris Khan Serving as TT GPS Baz Muhammad District Mohmand

.....Appellant

VERSUS

1. The Secretary (E&SE) Department Khyber Pakhtunkhwa, Peshawar
2. The Director (E&SE) Department Khyber Pakhtunkhwa, Peshawar
3. District Education Officer (Male) District Mohmand.

.....Respondents

SERVICE APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974, WHEREBY THE APPELLANT WAS DEPRIVED FROM PROMOTION INSPITE OF THE FACT THAT THE APPELLANT WAS QUITE ELIGIBLE FOR PROMOTION W.E.F 03.12.2021 FOR THE POST OF SENIOR THEOLOGY TEACHER BPS-16, HOWEVER THE NAME OF THE APPELLANT WAS NOT CONSIDERED FOR PROMOTION, INSPITE OF THE FACT THAT THE COMPETENT AUTHORITY FORWARDED THE REQUEST FOR PROMOTION OF THE APPELLANT.

Prayer in Appeal:

On acceptance of the instant Appeal, the Appellant being eligible and entitled for the post of Senior Theology

Teacher (STT) BPS-16 w.e.f 03.12.2021 as per Seniority list, but the Respondents violated the Seniority of the Appellant, therefore, the Respondents may very kindly be directed to promote the Appellant w.e.f 03.12.2021.

Respectfully Sheweth:-

The Appellant humbly submits as under:-

1. That the Appellant is peaceful and law abiding citizen of Pakistan and is entitled for all the rights guaranteed by the Constitution of Islamic Republic of Pakistan, 1973.

2. That the Appellant was appointed as Theology Teacher on 15.01.2016 after the completion of all codal formalities, the merit list was prepared according to the Merit position and thereafter the Appointment order of the Appellant was issued. **(Copy of the Merit List and Appointment order dated 15.01.2016 are attached as annexure A).**

3. That the Appellant assumed the charge of post of TT BPS-15 and was performing his duties with great zeal and zest and to the entire satisfaction of his high ups.

4. That the Respondent No 2 placed the seniority list for promotion of the Theology Teachers (TT) BPS-15 with recommendation of being promotion to the post of STT BPS-16, in which the name of the Appellant was placed at serial No 9 and after conducting of DPC the name of the Appellant was even not consider for promotion, inspite of the fact that there were 8 vacant positions of the post of STT BPS-16, however only 5 candidates had been recommended for promotion. **(Copy of the Seniority list is attached as annexure B).**

5. That consequent upon the recommendation of the Departmental Promotion Committee, the competent Authority while issued the impugned order dated 03.12.2021 whereby combined promotion to the next higher post of the candidates have been issued. **(Copy of the order dated 03.12.2021 is attached as annexure C)**

6. That the Appellant, while pointed out the Irregularities and illegalities in the promotion list to the competent authority and one Rooh Ullah which is placed at Serial No 6 in the list was terminated and inspite of his termination order provided to the competent authority his name was placed before the DPC and the Appellant when pointed out the name and termination order of the said Rooh Ullah even then they have been ignored the request of the Appellant and placed the name of said candidate and if his subject name was not placed before the DPC the Appellant would have been considered and promoted to the post of STT BPS-16. **(Copies of the Relevant record are attached as annexure D)**

7. That the Appellant repeatedly submitted his requests to the Respondents for promotion w.e.f 03.12.2021 from which his colleagues have been promoted which were endorsed by the Respondents and forwarded further for recommendation and even it was pointed out to the competent authority that the Appellant was eligible to be promoted on the post of STT BPS-16 w.e.f 03.12.2021. **(Copies of the Applications and recommendations of the competent authority are attached as annexure E)**

8. That the Respondents inspite of realizing the eligibility and entitlement of the Appellant for promotion to the post of STT BPS-16 and having recommendation for further promotion, even then the Appellant was ignored and thereafter the Appellant submitted Departmental Appeal on dated 08.03.2022 to the Respondent No 1 which has been endorsed, but till date no order of promotion has been issued. **(Copy of the Departmental Appeal is attached as annexure F)**

9. That on the complaint of Appellant inquiry committee was constituted to probe into the matter.

10. That after conducting proper inquiry the inquiry committee recommended the Appellant to be promoted for the post of STT, however, till date the Appellant was not promoted and on 03.12.2021 STT Teachers was promoted from TT to STT.

11. That the Respondent No 2 also recommended the Appellant to be promoted from TT to STT but till yet no promotion order has been issued in favour of the Appellant.

12. That feeling aggrieved from the act of Respondents, the Appellant having no other adequate and efficacious remedy, approaches this Honourable Tribunal on the following grounds inter-alia:-

GROUNDS:-

A) That the Appellant is peaceful and law abiding citizen of Islamic Republic of Pakistan and is fully entitled to all

the basic and fundamental rights as enshrined in the fundamental law of the state, interpreted and guaranteed by the law of the land.

B) That the acts of the Respondents of not following the same criteria which has been safeguarded by the law and rules, while in the instant case the respondents have not yet been considered the case of the Appellant, which is illegal, unlawful, unnatural, ab-initio, null and void in the eye of law, hence liable to be declared so.

C) That it is pertinent to mention here that the Appellant was eligible and entitled for promotion on the date, whereby his other colleagues have been placed before the DPC and were promoted, however the name of the Appellant was mentioned at Serial No 9, after the exclusion of Terminated Employee, he was quite eligible to be consider for promotion to the post of STT BPS-16 but due to the wrong and terminated candidate was mentioned at Serial No 6, the name of the Appellant was even not considered by the DPC for promotion, therefore the Appellant was treated malafidely and violated his fundamental rights.

D) That the fundamental rights of the Appellant has blatantly violated by the Respondents and the Appellant has been discriminated and has been denied his due rights under the Constitution of Islamic Republic of Pakistan, 1973.

E) That the Appellant is not treated in accordance with law, rules and Regulations.

F) That the Appellant is appointed according to rules and on adopted procedure by the respondents and after his appointments he has never ever given an opportunity of any complaint to the respondents and performed his duties with full devotions, the Appellant being eligible

for Promotion being most Senior employee of the Respondents Department serving in the Respondents Department since 2016.

G) That the Applications and Appeal of the Appellant was properly examined along with record and reach to the conclusion, the right of promotion of the Appellant has been realized and recommended for promotion but till date the Respondents are even not implementing their commitments which is against the rules, law and regulations.

H) That any other ground not raised here specifically may graciously be allowed to be raised at the time of arguments.

PRAYER:-

It is, therefore, most humbly prayed that, On acceptance of the instant Appeal, the Appellant being eligible and entitled for the post of Senior Theology Teacher (STT) BPS-16 w.e.f 03.12.2021 as per Seniority list, but the Respondents violated the Seniority of the Appellant, therefore, the Respondents may very kindly be directed to promote the Appellant w.e.f 03.12.2021.

Any other relief, not specifically asked for may also graciously be extended in favour of the Appellant in the circumstances of the case.

Appellant

Through:

(BISMILLAH JAN WAZIR)
&
(BASHIR KHAN WAZIR)
Advocate,
High Court, Peshawar

Dated:- 13.07.2022

CERTIFICATE:

It is certified that no such like Appeal has earlier been filed before this Hon'ble Tribunal.

DEPONENT

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BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. _____/2022

Faris Khan .....**Appellant**

Vs

Government of Khyber Pakhtunkhwa & others

.....**Respondents**

AFFIDAVIT

I, **Faris Khan** S/o Shan Badhsah R/o Post Office Yakaghund Tehsil Pindyali District Mohmand, do hereby solemnly affirm and declare on oath that the contents of the **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

DEPONENT

REVISED/ VERIFIED OPEN MERIT LIST OF TT (MALE) CANDIDATES OF MOHMAND AGENCY FOR FREH APPOINTMENT (RE-INTERVIEWED BY THE ENQUIRY COMMITTEE W.E.F 1/12/2015 TO 22/12/2015)

S.No	Name	F/Name	Tehsil	DOB	SSC	Score	FA	Score	BA	Score	MA	Score	Prof	Score	Swr Exp	Total	Remarks	Remarks of the enquiry committee
1	Ali Shah	Ziarat Said	Halimzai	11.4.84	641	12.21	424	15.80	191	13.85	573	13.27	518	12.95		74.08		Verified
2	Abdul Wahid	Gul Jan	SAFI	1.2.88	513	12.07	450	18.00	148	12.65	310	13.27	430	10.75		64.75		Verified
3	Faris Khan	Shah Badshah	Pandiala	1.3.1987	688	13.10	405	13.50	261	13.13	425	14.17	424	10.60		64.50		Verified
4	Murtaza Khan	Gul Rahman	SAFI	5.9.82	654	14.53	459	12.97	330	12.00	392	13.07	353	13.33		63.89		Verified
5	ShahMeer Khan	Ghanur Rehman	Ambar	12.12.85	498	11.72	318	14.47	309	11.24	42[illegible]	14.00	404	10.10		61.52		Verified
6	Abdul Wali Khan	Gul Zamin	SAFI	8.3.87	557	12.38	387	12.90	367	11.36	431	14.[illegible]	383	9.58		60.54		Verified
7	Abdul Bari Jan	Mesaad Gul	Ambar	17.10.86	577	13.08	40[illegible]	10.55	284	10.33	457	15.23	322	[illegible]		59.60		Verified
8	Umar Farooq	Gul Rahman	Baizai	1.3.1986	554	12.31	405	12.82	299	10.87	397	13.07	410	10.25		59.32		Verified
9	Amar Nawab	Gul Mohammad	SAFI	15.5.84	560	13.18	595	10.82	336	12.22	378	14.15	346	8.65		59.01		Verified
10	Ziaur Rehman	Samiul Haq	SAFI	9.6.84	458	10.78	337	14.57	321	[illegible]	[illegible]	[illegible]	336	8.43		58.63		Verified
11	Hameedullah	Shereen Mohd	Halimzai	2.10.89	516	14.54	529	17.63	0	0.00	441	15.37	314	10.85		58.39		Verified
12	Fida Mohammad	Sada Khan	Pandiala	30.12.84	485	11.41	495	12.64	310	11.27	415	14.05	401	10.[illegible]		58.35		Verified
13	Ayaz Khan	Dilbar Khan	Pandiala	20.3.1988	504	11.86	382	12.73	[illegible]	[illegible]	392	12.56	375	9.38		58.29		Verified
14	Bacha Said	Mukin Khan	Pandiala	12.3.85	369	8.68	410	12.93	372	[illegible]	35	12.87	410	10.25		58.24		Verified

Mr. Mohammad Ali
Assistant Director,
D.E (FAT) Peshawar

Mr. Naeem Khan
Assistant Director,
D.E (FATA) Peshawar

Mr. Saleem Khan
Head Master, GHS
Hashim Abad Yakaghund

Mr. Iqbal Hussain SST
GHS Haji Yagan
Mohmand Agency

9

RE-COLLED/ VERIFIED OPEN MERIT LIST OF IT (MALE) CANDIDATES OF MOHMAND AGENCY FOR FRESH APPOINTMENT (RE-INTERVIEWED BY THE ENQUIRY COMMITTEE W.E.F 12/12/2015 TO 22/12/2015)

[illegible]	[illegible]	[illegible] Name	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
11	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
16	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
17	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
18	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
19	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
20	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
21	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
22	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
23	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
24	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
25	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
26	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
27	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]

[illegible]
Assistant Director,
DG (FATA) Peshawar

[illegible]
Assistant Director
DG (FATA) Peshawar

10

OFFICE OF THE AGENCY EDUCATION OFFICER
MOHMAND AGENCY AT GHALLANAI
P.NO.0924290180 FAX:0924290180

APPOINTMENT ORDER.

In compliance to the decision of the Honorable High Court Peshawar vide Directorate of Education FATA letter No.11547 dated 17/11/2015 and in accordance with the approval of the Departmental Selection committee thereupon verified by the enquiry committee w.e.f. 01/12/2015 to 22/12/2015, The following male candidates of Mohmand Agency are here by appointed against the vacant TT posts purely on temporary basis in BPS-09 @Rs.(8015-495-22865) plus usual allowances as admissible under the rules from the date of their taking over charge in the Schools noted against their names in the interest of public service.

TT= S.No.01 to 14

S.No	Name	Father's Name	Appointed as.	Place of posting.	Remarks
1	Said Ali Shah	Ziarat Said	Theology Teacher	GMS Akhunzadgan	Against vacant post
2	Hameed Ullah	Sherin Muhammad	Theology Teacher	GMS Gahzi Baig	-do-
3	Abubakar Sadiq	Amanat Khan	Theology Teacher	GPS Khuram China	-do-
4	Muhammad Arif	Mir Azam Khan	Theology Teacher	GPS Kamali Yousaf Khel	-do-
5	Abdul Wahid	Gul Jan	Theology Teacher	GHS Sandu Khel	-do-
6	Fazli Wadood	Hazrat Said	Theology Teacher	GPS Kadi No.02	-do-
7	Abdul Khaliq	Oulas Khan	Theology Teacher	GPS Taj Muhammad	-do-
8	Rafi Ullah	Naik Amal	Theology Teacher	GPS Shah Baig Kamali	-do-
9	Faris Khan	Shah Badshah	Theology Teacher	GPS Kadi No.03	-do-
10	Muhammad Tyyeb	Mufti Jan	Theology Teacher	GMS Saparay	-do-
11	Murtaza Khan	Gul Rehman	Theology Teacher	GPS Toor Kore	-do-
12	Abdul Wali Khan	Gul Zamin	Theology Teacher	GPS Sharab Kore	-do-
13	Shah Mir Khan	Ghani ur Rehman	Theology Teacher	GMS Habibzai	-do-
14	Amer Nawab	Gul Muhammad	Theology Teacher	GMS Abdul Baqi	-do-

TERMS/CONDITIONS

1. The appointment of the candidates has been made purely on temporary basis and is liable to termination at any time without assigning any reason.
2. All academic, professional and domicile documents/certificates of the candidates should be verified from the concerned institutions through AEO office before drawl of their salaries, otherwise the DDO will be held personally responsible for the consequences.
3. Charge reports should be submitted to all concerned in duplicate.
4. Health & age certificates obtained from the Agency Surgeon should be provided to this office.
5. Their age should be with accordance to the Govt: Policy.
6. If they failed to report their arrival within 15 days, their appointment orders will be automatically considered as cancelled.
7. If any legal and technical error/ omission pointed out, the appointment orders will be stand cancelled.

(SAEED GUL)
Agency Education Officer,
Mohmand Agency at Ghallanai

Endst: No.Estab:II/TT/Apptt/ 451-57 /dated Ghallanai the 15/01/2016.

Copy to:-

1. Director of Education, FATA Peshawar w/r to his No. & date mentioned above.
2. Political Agent Mohmand Agency.
3. Agency Accounts Officer, Mohmand Agency at Ghallanai.
4. Agency Surgeon Mohmand Agency at Ghallanai.
5. Principals/Head Masters concerned with the direction to follow the terms & conditions in letter and spirit as cited above.
6. AAEO concerned in this office.
7. Candidates concerned.

Note: - Unattested Photo copy is not accepted.

Agency Education Officer,
Mohmand Agency at Ghallanai.

Hd/

12

Name of Official ..... Mr. Faris Khan

Caste or Race ..... Mohmand

Father's name ..... Mr. Shah Baal Khan

Residence ..... Village Bano Khel Yaqubzai Tamangai tel Pandialai Distt Mohmand

Date of birth 01-03-1987

Exact height by measurement 5-8

Personal mark of identification ..... Mark On Rt Foot

Signature of the Official ..... Faris

Signature of head of office .....

Seal of Office .....

I do hereby certify that I have examined Mr. Faris Khan a candidate for employment in the Office of the Education Department and can not discover that he is of any disease communicable or other constitutional affection or bodily infirmity or defect.

I do no consider this as disqualification for employment in the office of the Education Department. His age according to his own statement ..... year and by appearance about ..... years.

LEFT HAND THUMB AND FINGER IMPRESSIONS

Medical Superintendent,
Civil Hospital.....

MEDICAL SUPERINTENDENT
AHQ HOSPITAL CHARSADDA

چارج رپورٹ

میں مسمی فارس خان نے محکمہ ایجوکیشن کے آرڈر نمبر 4.51-57 بتاریخ 16-01-016 کو گورنمنٹ سکول کوز کری نمبر 3 میں اپنے پوسٹ TT کا چارج سنبھال لیا ہے۔

چارج دینے والا

چارج لینے والا

"B"

14

OFFICE OF THE DISTRICT EDUCATION OFFICER TRIBAL DISTRICT MOHMAND (SENIOR TT)

WORKING PAPERS FOR DEPARTMENTAL PROMOPTION COMMITTEES FOR THE PROMOTION OF (AT (MALE) POST TO SAT B-16

Total Number of Vacant Posts of TT	241
1/3 Share of SIT	80
Share of SIT 10%	80
Already Promoted	72
Available vacant Post of SIT	8
Proposed for Promotion	9

LIST OF TT (M) FOR THE PROMOTION TO SIT-16

S.No.	S.L No.	Name Official	Place of posting.	Date of birth.	D/O Apptointment as regular TT.	Qualification: Academic Qualification	Qualification: Professional Qualification	Whether eligible for promotion. Yes/No	Remarks
1	41	Lal Muhammad	GPS Prang Ghar	10/22/1949	11/3/1994	MA	Alamia	No	not recommended due to Dilhidra Madar
2	43	Atta Ullah	GPS Usha Jawara	2/9/1970	11/3/1994	SSC	Unspecified Alamia	Deferred due to Rahitul students.	
3	59	Abdullah	GPS Fati Abad	2/15/1967	2/14/1995	SSC	Alamia	Yes	Recommend.
4	94	Hizbullah	GHS Lakarai	21.6.1982	22.11.2002	MA BE	Alim & Ed	Yes	Recommend.
5	121	Abdul Sadiq	GPS Nawakalay Prang Ghar	5/15/1977	4/30/2007	SSC/MA Islamiat	Alamia	Yes	Recommend.
6	129	Rooh ullah	GPS Amat Tora No. 2	5/1/1983	9/1/2007	SSC	Alamia	File not Provided / Deferred due to doubt.	
7	146	Said Ali Shah	GPS Ajhuzaagan	4/11/1984	16/01/2016	MA Islamiat	MA Islamiat Sh Alamia	Yes	Recommend.
8	147	Abdul Wahid	GHS Qamar Dhi	1/3/1986	16/01/2016	MA Islamiat	Alamia	Yes	Recommend.
9	148	Faris Khan	GPS Kadi No 01	3/1/1987	16/01/2016	MA Islamiat	Alamia	X	X

1. It is certified that all the TT (Male General) included in the panel for promotion to the posts of SIT B-16.

(a) Hold the posts on regular basis and none of them is holding the post on adhoc/acting charge basis/contract.

(b) have completed the required minimum length of qualifying service and qualifications as required for promotion to the posts of SIT B-16 under the rules.

(c) None of them is on deputation to any organization under the federal/provincial/Autonomous/semi autonomous/international organizations.

(d) Neither any disciplinary/departmental proceedings/Anti corruption/judical enquiry is pending against them nor has any penalty been imposed upon any one of them during the last five years.

(e) No one is on long leave/Ex-Pakistan leave.

(f) Their ACRs synopsis are free from adverse remarks.

(g) They are all alive and serving.

(h) Their service books are enclosed herewith.

(i) Their 1st appointment order are attached herewith.

(j) The seniority list of DJ teachers is final, undisputed and not subjudice.

2. *The departmental promotion committee is requested to determine the suitability of the above TT for promotion to the posts of SIT B-16.*

District Education Officer

C

15

Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Notification

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification NoSO(B&A)/1-18/E&SE/2012 dated 11.07.2012 and Finance Department Endorsement No SO(FR)/FD/10-22(E)/2010 dated 16.07.2012, the following CT/DM/TT and AT Male (BPS-15) are hereby promoted to the post of Senior CT/Senior DM/Senior TT and Senior AT (BPS-16) ***(Rs. 18910-1520-64510)*** *plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, as per terms and condition given below with immediate effect and further they will be posted in the Government High /Higher Secondary Schools by the District Education Officer concerned against the vacant post of Senior CT/Senior DM/Senior TT and Senior AT (BPS-16) respectively:*

1. CT to Senior CTs (BPS-16)

S. No.	S.L. No.	Name of Official	Present Place of Posting	Date of Birth	Date of Apptt; as Regular CT	Remarks
1	66	Fazal Rahman	GHS Rahat Kore	01-03-1968	22-12-2005	Services placed at the disposal of District Education Officer (M) Mohmand for further posting
2	67	Mukhtiar Ali	GHSS Prang Ghar	25-02-1969	30-03-2007	----------do----------
3	68	Sadiq Muhammad	GHS Lakarai	10-06-1962	30-03-2007	----------do----------
4	70	Muhammad Ayaz	GMS Muambar Kalai	25-05-1975	30-03-2007	----------do----------
5	71	Khushdil Khan	GHS Subhan Khwar	02-03-1972	30-03-2007	----------do----------
6	72	Raham Dil	GMS Chanari	19-05-1971	13-04-2007	----------do----------
7	73	Adnan Khan	GHS Lakarai	02-03-1974	11-05-2007	----------do----------
8	74	M. Nisar	GMS Musa Kore	15-01-1975	16-05-2007	----------do----------
9	76	Jehangir Khan	GHS Yousaf Khel	23-06-1974	20-09-2007	----------do----------
10	79	Javed Khan	GMS Khadi Issa Khel	03-08-1981	30-11-2009	----------do----------
11	80	Hamid Jan	GHS Hasham Kore	01-02-1981	15-12-2009	----------do----------
12	81	Fazli Manan	GHS Qamar Din Kore	04-01-1982	15-12-2009	----------do----------
13	82	Hayat Khah	GMS Musa Kore	02-03-1979	15-11-009	----------do----------
14	83	Imran	GMS Adin Khel	01-01-1985	15-12-2009	----------do----------
15	84	Fazal Hadi	GHS Navi Kalai Laman	11-01-1977	15-12-2009	----------do----------

16

16	85	Zahid Ahmad	GMS Nao Prang Ghar	09-04-1979	27-01-2010	----------do----------
17	87	Itbar Jan	GHSS Ghallanai	07-10-1966	01-03-2012	----------do----------
18	89	Asfandyar	GMS Suran Dara	01-01-1984	04-09-2014	----------do----------
19	90	Arshad Khan	GHS Akhun Zadgan	12-12-1984	16-01-2016	----------do----------
20	93	Sartaj	GMS Ghazi Baig	28-01-1987	16-01-2016	----------do----------
21	94	Munir Khan	GMS Shawa	14-08-1983	16-01-2016	----------do----------
22	95	Muhammad Hashim Khan	GHSS Ghallani	11-04-1983	16-01-2016	----------do----------
23	96	Akbar Khan	GMS Muslim Kore	18-02-1977	16-01-2016	----------do----------

2. DM TO SENIOR DM BPS-16)

S. No.	S.L. No.	Name of Official	Present Place of Posting	Date of Birth	Date of Apptt; as Regular DM	Remarks
1	17	Bashir Gul	GMS Kandi Issa Khel	14-09-1974	12-09-2003	Services placed at the disposal of District Education Officer (M) Mohmand for further posting

3. TT TO SENIOR TT BPS-16.

S. No.	S.L. No.	Name of Official	Present Place of Posting	Date of Birth	Date of Apptt; as Regular TT	Remarks
1	59	Abdullah	GPS Faiz Abad	15-02-1967	14-02-1995	Services placed at the disposal of District Education Officer (M) Mohmand for further posting
2	94	Hizbullah	GHS Lakarai	21-06-1982	22-11-2002	----------do----------
3	121	Abdul Sadiq	GPS Nao Kalai (Prang Ghar)	15-05-1977	30-04-2007	----------do----------
4	146	Said Ali Shah	GPS Akhun Zadgan	04-11-1984	16-01-2016	----------do----------
5	147	Abdul Wahid	GHS Qamar Din	01-02-1986	16-01-2016	----------do----------

4. AT TO SENIOR AT BPS-16.

S. No.	S.L. No.	Name of Official	Present Place of Posting	Date of Birth	Date of Apptt; as Regular AT	Remarks
1	34	Muhammad Zubair	GMS Navi Kalai	04-06-1975	24-04-2007	Services placed at the disposal of District Education Officer (M) Mohmand for further posting
2	37	Hameedullah	GHS Dab Kore	30-11-1982	12-12-2009	----------do----------

Terms and conditions: -.

1 *They would be on probation for a period of one year extendable for another one year.*

17

2 *They will be governed by such rules and regulations as may be issued from time to time by the Govt.*
3 *Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time by the Government.*
4 *Charge reports should be submitted to all concerned.*
5 *Their Inter-Se- seniority on lower post will remain intact.*
6 *No TA/DA is allowed for joining them duty.*
7 *They will give an under taking to be recorded in their service books to the effect that if any over payment is made to them in the light of this order, the same will be recovered and if anyone is wrongly promoted he will be reversed.*

(Hafiz Dr. Muhammad Ibrahim)
Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst: No. 16614-70 */ File No.1/Promotion Senior Teachers (PSB-16)2021*
Dated Peshawar the 3/12/ *2021*

Copy forwarded for information and necessary action to the:

1. *Accountant General Khyber Pakhtunkhwa Peshawar.*
2. *District Education Officer Mohmand.*
3. *District Accounts Officer Mohmand.*
4. *Officials Concerned.*
5. *PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.*
6. *PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.*
7. *M/File*

3/12/2021

Deputy Director (Estab)
Merged Districts

Statement

18 (10)

I, Mr. Muhammad Ali Khan ADEO (Estab) handed over the Removal order/notice of Mr. Roohullah TT to Mr. Waheed ullah dealing clerk on dated 21/09/2021. Beside this I had been totally neglected in the whole process of promotion. Therefore, I don't know about the process please.

Allam

25/03/2022

Verified
Signature
mine

T.T فارسی

25/3/2022

آپ کی اطلاع کیلئے عرض ہے کہ SST اور S/Teacher میرٹ پوسٹس
کیلئے DPC 01-09-2021 کو ہوئی تھی جبکہ روح اللہ T.T 25 کی پوسٹس
آرڈر مجھے 28-9-2021 کے بعد ملا تھا۔ تو پھر ہم کیسے روح اللہ کو
ورکنگ پیپر سے نکال لیتے۔

اس کے علاوہ ہمارے پاس SST کی 8 پوسٹ خالی تھی
جبکہ ہم نے فارس T.T کو Reserve کے طور پر 9 ویں
نمبر پر ڈالا تھا۔ پھر یہ ڈسٹرکٹ میرٹ کی ذمہ داری ہے کہ
وہ رزلٹ کے ریکارڈ پر نظر ثانی کرکے DEO سے روح اللہ T.T کی
ٹرمینیشن اور ڈیٹرمینیشن کرکے ان کی ریورٹ کرے۔

28/03/22

وصیہ اللہ DM ریورٹ
ڈسٹرکٹ ایجوکیشن آفس ژوب

OFFICE OF THE DISTRICT EDUCATION OFFICER
MOHMAND TRIBAL DISTRICT

Ph: 0924-290180

Email :-deomohmand@gmail.com

No. 9161-63

Dated: March 25, 2022

20

INQUIRY NOTIFICATION

(10)

In pursuance of the letter received from the Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department vide No. Gen/SO(C)/E&SED/KPK/1-7/2022/Mr. Faris Khan/SE-Nill dated 22.03.2022 on the subject noted as "Request for promotion from TT to STT (Lodged by Mr. Faris Khan, TT, GPS Baz Mohammad District Mohmand), the undersigned is pleased to nominate **Mr. Sher Ali Principal GHS Lakarai** to probe the instant case and submit his report within three (03) days positively with clear cut recommendations and also fix responsibilities.

District Education Officer
(Male) Mohmand

Endst No & Date: Even
Copy forwarded to the:

1) Section Officer (Complaints) with his letter No. and date above.
2) Director of Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
3) Mr. Sher Ali Principal GHS Lakarai.
4) PA to DEO (Male) District Mohmand.

District Education Officer
(Male) Mohmand

DISTRICT EDUCATION OFFICER
TRIBAL DISTRICT MOHMAND
P.NO:0924290180 FAX:0924290180

21

NOTIFICATION

1. **WHEREAS** Mr.Roohullah TT GPS Qamar din Tehsil Safi Tribal District Mohmand was found willfully absent from duty and living abroad since 28/11/2011 by concerned ADEO, (M) and 103 Brigade at Mohmand.
2. **AND WHEREAS** the accused was proceeded against under Khyber Pakhtunkhwa Govt: Servants (Efficiency & Discipline) Rules 2011, for the charge of "willful absence from duty" as mentioned in the show cause notice served upon him under registered post at his home/School address vide DEO No: 5712-16 AAEO(M&E) dated 06/11/2019.
3. **AND WHEREAS** Mr. Rooh Ullah TT GPS Qamar din Tehsil Safi Tribal District Mohmand did not report to his duty within stipulated period of time and turned his ears deaf.
4. ***AND WHEREAS** Charge sheet was served upon* Mr.Roohullah TT GPS Qamar din Tehsil Safi Tribal District Mohmand *vide charge sheet No. 5961-66 dated 22/11/2019 through registered post at his home/school address therein the accused was directed to submit reply in his defense through personal contact with the office. But again the absent teacher turned his ears deaf and did not bother to appear before the undersigned.*
5. ***AND WHEREAS*** DEO office Tribal District Mohmand published an absentee notice against the accused employee in " Daily Express" Peshawar dated 11/12/2019"and Daily Aaj" Peshawar on dated 14/12/2019 but the accused employee did not appear before the DEO Office.
6. **AND WHEARAS** the competent authority, the District Education officer Mohmand, after having considered the charges, evidence on record and facts of the case, is of the view that the charge of willful and unauthorized absence against the accused official has been proved.
7. ***NOW THEREFORE,** In exercise of the Powers conferred under Rules-4 (b) iii of Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules 2011, the competent Authority, District Education officer Tribal District Mohmand is pleased to impose major penalty of " **Removal from service** " upon* Mr. Roohullah TT GPS Qamar din Tribal District Mohmand on *account of his willful absence from duty with immediate effect.*

(Jaddi Khan Khalil)
District Education Officer,
Tribal District Mohmand

Endst: No. 09-12 Dated 02 /01/2020

Copy forwarded to the:

1. Director Education E&SE KP Peshawar
2. Deputy Commissioner Tribal District Mohmand
3. District Accounts officer Tribal District Mohmand.
4. PS to Additional Chief Secretary (NMD) for perusal of the Additional Chief Secretary
5. ADEO concerned for entry in his service book
6. Accountant local office for stoppage of his pay forth with.
7. Pay clerk local office for entry in his service book.
8. Official concerned
9. Office record only.

District Education Officer
Tribal District Mohmand

22

بحضور جناب DEO صاحب ضلع مہمند

درخواست برائے درستگی DPC سینیارٹی لسٹ

جناب عالی!

مؤدبانہ گزارش ہے کہ سائل نے اس سے قبل بھی کئی بار آپکو زبانی طور پر آگاہ کیا ہے جبکہ آج بذریعہ درخواست گزارش کی جاتی ہے کہ حالیہ DPC کیلئے T.T کیڈر کا مرتب کردہ سینیارٹی لسٹ میں ایک ٹرمینیٹ ٹیچر (روح اللہ T.T) کو شامل کیا گیا ہے جو (02/01/2020) کو ٹرمینیٹ کیا گیا ہے۔

جسکی وجہ سے سائل (فارس خان T.T) کا پروموشن سے محروم رہنے کا اندیشہ ہے

لہٰذا آپ صاحبان سے درخواست کی جاتی ہے کہ ٹرمینیٹ روح اللہ T.T کو DPC لسٹ سے خارج کریں اور سائل (جو پروموشن کا حقدار ہے) کو DPC لسٹ میں شامل کرنے کے احکامات صادر فرما کر مشکور فرماویں۔

بندہ تاحیات دعاگو رہے گا۔

العارض!

21/09/2021 المورخہ:

Fariz

اچھا تابع فرمان معلم فارس خان T.T

GPS بازوخیل کور تحصیل یکہ غنڈ ضلع مہمند۔

13-12-2021

خدمت جناب DEO صاحب ضلع ہرنڈ

23

Azeem
ES-I

درخواست برائے عطائیگی پروموشن

13.12.21

جناب عالی!

مؤدبانہ گزارش ہے کہ سائل محکمہ تعلیم میں T.T پوسٹ پر اپنے فرائض سرانجام دے رہا ہے۔ موجودہ DPC کے لئے جو سینیارٹی لسٹ جاری کیا گیا تھا۔ اس میں پروموشن کیلئے آٹھ اساتذہ مطلوب تھے۔ سائل سے پہلے پوزیشن پر موجود دو اساتذہ میں ایک ٹرمینیشن اور دوسرے کیساتھ موصولہ کوالیفکیشن نہ ہونے کی وجہ سے سائل نااہل ہیں۔ جسکی وجہ سے پروموشن کا حقدار ہے لیکن موجودہ DPC میں پروموشن باہر کیا گیا ہے۔

لہٰذا

آپ صاحبان سے درخواست کی جاتی ہے کہ سائل کے لئے پروموشن کے احکامات صادر فرما کر مشکور و ممنون فرماویں۔

بندہ تاحیات دعاگو رہے گا۔

العارض!

المورخہ: 11/12/2021

Fariz

اپنا تابع فرمان معلم فارس خان ولد [illegible] GPS بانہ [illegible] تحصیل کبل ہرنڈ۔

Jehangir

بخدمت جناب ڈائریکٹر صاحب محکمہ تعلیم خیبر پختونخواہ

24

3728
ڈائری نمبر

درخواست برائے عطائیگی پروموشن

جناب عالی!

معروضانہ گزارش ہے کہ ضلع ٹھٹھہ کے محکمہ تعلیم نے آپکے حکم پر سینیارٹی کے لئے جو نوٹیفیکشن جاری کیا تھا۔ اسمیں سائل کا نام نویں نمبر پر موجود ہے جبکہ پروموشن کیلئے آٹھ اساتذہ مطلوب تھے۔ لیکن سائل سے پہلے ان آٹھ اساتذہ میں سے روح اللہ نامے ایک T.T 02/01/2020 میں ریٹائرڈ کیا گیا ہے جبکہ دوسرے استاد محمد T.T کے ساتھ موجود مطلوب اسناد میں سے کچھ بھی نہیں ہے اب موجودہ DPC میں سے صرف پانچ اساتذہ کو پروموشن کیا گیا ہے باقی تین رہ گئے ہیں۔ جسکی وجہ سے سائل کا حق بنتا ہے کہ وہ چھٹے نمبر پر پروموٹ کیا جائے۔

لہٰذا آپ صاحبان سے درخواست کی جاتی ہے کہ سائل کیساتھ پروموشن کا تمام اسناد موجود ہے پس موجودہ پروموشن لسٹ میں سے ریٹائرڈ روح اللہ نام خارج کر سائل کے پروموشن کے احکامات صادر فرمادیں۔

بندہ تاحیات دعاگو رہے گا۔

العارض:

13/12/2021 = المورخ

ایک تابع فرمان معلم فارس خان T.T گورنمنٹ پرائمری سکول بازمحمد کوٹ ضلع ٹھٹھہ

OFFICE OF THE DISTRICT EDUCATION OFFICER
MOHMAND TRIBAL DISTRICT
Ph. No. : 0924-290180
FAX 924290180
Email omohmand@gmail.com
Endst: No. Dated /04/2022

25

To

The Director Education,
&SE Khyber Pakhtunkhwa Peshawar.

Subject: **REQUEST FOR PROMOTION FORM TT TO STT (LODGED BY MR.FARIS KHAN TT GPS BAZ MUHAMMAD DISTRICT MOHMAND.**

Memo:

Reference your office letter No. 3398-3401 dated 25.03.2022 on the subject noted above and to convey that the requisite detail report in the subject matter is hereby submitted for your kind information and further necessary action please as under.

1. **WHEREAS** the dealing assistant and the then committee did not updated the seniority list, but Mr, Faris khan TT was included in the working papers for promotion from TT to STT at S.NO. 9 and the working papers were submitted to the Directorate of Education E&SE KPK Peshawar vide this office letter No. 21 dated 04.01.2022 (Annex A).
2. **AND WHEREAS** due to Alamia from Itehadul Maddaris Mr.Lal Muhammad at S.No. 1 was not recommended in the DPC held on dated 01/09/2021 at Directorate of Education E&SE KPK Peshawar while at S.No.6 Mr.Roohullah was declared deferred as his file was missing.
3. **AND WHEREAS** there are eight (8) posts for the promotion of TT to STT and the complainer is at S.No 9. And only five (5) were recommended and promoted to STT on dated 03/12/2021.
4. **AND WHEREAS** there are 08 seats for promotion quota of (STT), S.No.01 (not recommended) and S.No6 (Removed teacher).

Therefore the undersigned recommends that Mr. Faris khan TT on S.No. 09 may be considered for promotion from TT to STT on promotion quota as per rules/policy and the complainer is already there at S.No. 9 please.

District Education Officer,
Tribal District Mohmand.

Endst: No. 1705-6 Dated 21 /04/2022
Copy forwarded to the:
1. Additional Director Education (NMD) KP Peshawar
2. Office Record

District Education Officer,
Tribal District Mohmand

OFFICE OF THE DISTRICT EDUCATION OFFICER
MOHMAND TRIBAL DISTRICT
Ph. No.☎: 0924-290180
FAX 🖷: 0924290180
Email✉ :- deomohmand@gmail.com

26

No. 21 Dated 4/01/2022

To

The Director Education,
E&SE Khyber Pakhtunkhwa Peshawar.

Subject: **PROVISION OF DOCUMENTS IN R/O DEFERRED OFFICIALS IN DEFERENT CADERRS DISTRICT MOHMAND**

Memo:

A list of deferred teachers in the DPC of District Mohmand for promotion to SCT/SDM/SPET/STT and SAT is hereby recommended and submitted for promotion and further necessary action please.

S.No	Name of Officials	School	Deferred due to	Status	Submission of documents Yes/No	Remarks
			CT to SCT			
3	Noor Muhammad CT	GHS Nahqi	Non availability of S/Book	Eligible	Yes	File already provided by this office along with S/B
4	Akhtar Muhammad CT	GHS Pandiali	No CT entry in S/Book	Eligible	Yes	Entry made in S/Book and submitted by this office.
5	Bakht Sher CT	GMS Shawa	File not available	Eligible	Yes	File already provided by this office.
6	Shakir Ullah CT	GMS Hashim kore	File not available	Eligible	Yes	File already provided by this office.
			DM TO SDM			
7	Zaheer Ullah DM	GMS Gato warsak		Eligible	Yes	File already check by DPC Committee.
8	Arshad Hussain DM	GMS Shawa	File not available	Eligible	Yes	File already provided by this office.
9	Shahin Shah DM	GHS Lakarai	CNIC	Eligible	Yes	CNIC provided by this office.
			AT to SAT			
10	Ashraf Sadiq	GHS Ekka Ghund	Shahdatul Alamia Entry	Eligible	Yes	Entry made in S/Book and submitted
			PET TO SPET			
11	Muhammad Ishfaq PET	GMS Akhunzadgan	Share of sanctioned post	Eligible	Yes	Sanctioned post mistake in w/paper is 59, but the sanctioned post of PET is 73.
12	Ijaz Ahmad PET	GHS Pandiali	Share of sanctioned post	Eligible	Yes	Sanctioned post mistake in w/paper is 59, but the sanctioned post of PET is 73.
13	Zakir Hussain PET	GMS Abdul Kore	Share of sanctioned post	Eligible	Yes	Sanctioned post mistake in w/paper is 59, but the sanctioned post of PET is 73.
14	Nasar khan PET	GHS Sandu khel	Share of sanctioned post	Eligible	Yes	Sanctioned post mistake in w/paper is 59, but the sanctioned post of PET is 73.
			TT to STT			
15	Faris khan TT	GPS Baz Muhammad Kore	Termination of Rooh Ullah TT	Eligible	Yes	The termination order of Rooh Ullah TT already submitted by this office.

District Education Officer (M),
Tribal District Mohmand

05/08/2021

27

OFFICE OF THE DISTRICT EDUCATION OFFICER
MOHMAND TRIBAL DISTRICT
Ph. No.: 0924-290180
FAX: 0924290180
Email: eomohmand@gmail.com

NOTIFICATION

Without prejudice to legal remedies available to Provincial Government and in pursuanc of judgment of the Peshawar High Court dated 19-02-2020 in WP No.5673-P/2019, Sanction is hereby accorded to the encashment of leave in lieu of LPR for 313 days in respect of Mr. Umar Sher S/O Khan Sher TT (BPS-15) GPS Ajmal Kore Tamanzai Tehsil Pandiali Mohmand Tribal District shall stand retired from Govt. Service with effect from 31/12/2020 (AN) on Pre-Mature retirement. Subject, to CPLA/Appeal of the Provincial Government against aforementioned judgment of Peshawar High Court and any order contrary as and when issued by the Apex Cou of Pakistan.

His date of birth 1st Appointment date, Retirement date, Length of Qualifying Service & Personal Number are as under:

1. Date of birth: 15/01/1970.
2. 1st Appointment 04/11/1994
3. Date of Retirement: 31/12/2020
4. Length of Service 26-01-27.(Y/M/D)
5. Personal No. 103923

(NOOR HASSAN KHAN)
District Education Officer,
Mohmand Tribal District.

Endst:No. 259-73 /Estab:II/Retirement Dated Ghallanai the: 21/01/2021.

Copy forwarded to the.
1. District Accounts Officer District Mohmand.
2. EMIS Concerned.
3. Pay Clerk.
4. Official concerned.
5. Office record.

District Education Officer,
Mohmand Tribal District.

Hd

28

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Block "A" Civil Secretariat, Peshawar *Phone No. 091-9223540*

No.Gen/SO(C.)E&SED/KPK/1-7/2022/Mr. Faris Khan/SE-Nil *Dated 08.03.2022*

To

The Director,
Elementary & Secondary Education Department,
Khyber Pakhtunkhwa Peshawar

The District Education Officer (Male),
District Mohmand

Subject: **REQUEST FOR PROMOTION FROM T.T TO S.T.T** (Lodged by Mr. Faris Khan, T.T, GPS Baz Mohammad District Mohmand)

I am directed to refer to the subject cited above and to enclose herewith copy of a self-explanatory application/complaint along-with its enclosures, lodged by Mr. Faris Khan, T.T, GPS Baz Mohammad District Mohmand, with the request to examine the case as per rules/policy and a detailed report may be submitted to this office **within a week time** positively, please.

Encl: As Above:

(SHAKEEL AHMAD KHATTAK)
SECTION OFFICER (COMPLAINT)

Endst: of even number & date:
Copy of the above is forwarded to the:
PA to Deputy Secretary (Budget) E&SE Department for information.

SECTION OFFICER (COMPLAINT)

29

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Block "A" Civil Secretariat, Peshawar *Phone No. 091-9223540*

No.Gen/SO(C.)E&SED/KPK/1-7/2022/Mr. Faris Khan/SE-Nil *Dated 31.05.2022*

To

The Director,
Newly Merged Tribal Districts,
Elementary & Secondary Education Department,
Khyber Pakhtunkhwa Peshawar

Subject: **REQUEST FOR PROMOTION FROM T.T TO S.T.T** (Lodged by Mr. Faris Khan, T.T, GPS Baz Mohammad District Mohmand)

I am directed to refer to the subject cited above and to enclose herewith copy of a Inquiry Report/Recommendations, received from Mr. Sher Ali Principal GHS Lakarai Mohmand on the complaint lodged by Mr. Faris Khan, T.T, GPS Baz Mohammad District Mohmand, with the request to implement the Inquiry Report/Recommendations in true letter & spirit, under intimation to this office **within a week time** positively, please.

Encl: As Above:

(SHAKEEL AHMAD KHATTAK)
SECTION OFFICER (COMPLAINT)

Endst: of even number & date:
Copy of the above is forwarded to the:

1. PA to Additional Secretary (Monitoring) E&SE Department.
2. PA to Deputy Secretary (Monitoring) E&SE Department

SECTION OFFICER (COMPLAINT)

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INQUIRY REPORT

AUTHORITY: DEO(M) Mohmand No 1161-63 dated 25/3/2022
VENUES: Office of the District Education Officer (Male) Mohmand
DATED: 30/03/2022

ABSTRACT: Seniority List was not updated by not excluding the terminated teacher, Mr Rooh Ullah Ex-TT GPS Qamar Din Mohmand vide Notification No 9-17 dated 2/1/2020.

BRIEF HISTORY OF THE CASE: In pursuance of the letter of Govt of Khyber pakhtunkhwa E&SED Peshawar Notification No Gen/So(G) E&SED/KPK/1-7/2022/Mr. Faris khan /SE-Nil dated 22/3/2022 received by hand from Mr Faris Khan TT GPS Baz Muhammad CNIC 21403-9864533-3 on dated 25/3/2022 and subsequent letter received through Whatsapp vide Directorate of E&SE Khyber Pakhtunkhwa Peshawar No 3398-3401 dated25/3/2022 on 30/3/2022, the instant inquiry was conducted to prepare a fact finding report about the promotion case from TT to STT as Mr Faris Khan TT was left from promotion in the DPC held on 1/9/2022 and also to fix responsibility upon the officer/official who did not updated the seniority list of TT by not excluded the terminated Ex-TT Mr Rooh Ullah who was removed from service.

Annexure---1 & 2

STATEMENTS: The statements of the main officer and official were recorded as under:

Statement of Muhammad Ali, ADEO Establishment: He stated that he handed over the "Removal From Service order" of Rooh Ullah Ex-TT to Waheed Ullah the then dealing clerk on **21/9/2021**. He further said that beside this, he was neglected in the whole process of promotion and he did not know about the process. **Annexure---3**

Statement of Waheed Ullah the then D/clerk: He said that DPC for the promotion of TT to STT was held on **1/9/2021** and he received the termination order of Rooh Ullah Ex-TT on 21/09/2021so how could he exclude the name of Rooh Ullah from the working papers. He further said that 8 posts were vacant for STT promotion at that time and Faris TT was placed at 9th in the working papers so it was the responsibility of the Directorate to consider his case. **Annexure---4**

FINDINGS:

1. Mr. Faris Khan was appointed as TT on 16/01/2016.
2. Total No of posts for the promotion from TT to STT at that time were 8 and according to the dealing clerk, Mr faris was placed at 9th in the working papers as reserve.
3. A list of 15 deferred officials in different cadres including Faris Khan TT from the o/o the DEO Mohmand was farwarded to the Directorate of E&SE with clear remarks of termination of Rooh Ullah Ex-TT vide DEO(M) mohmand No 21 dated 4/01/2022 but in vain. **Annexure---5**
4. ADEO Establishment is the incharge of his branch and he should circulate the Removal from service order of Rooh Ullah Ex-TT to all branches for necessary action in time which he did not. So Rooh Ullah Ex-STT was not excluded from the seniority list and working paper due to lethargic and irresponsible attitude of Muhammad Ali ADEO Establishment. He handed over the said termination order to Waheed Ullah the then dealing clerk of promotion cases on 21/01/2021 **after 20 days of the DPC and about one year, 8 months and 19 days** of the issuance of the termination order of Rooh Ullah Ex-TT.

RECOMMENDATION: The report to the Directorate of E&SE KP Peshawar may be sent with the request for the promotion of Mr. Faris Khan to STT please.

Inquiry Officer
Sher Ali Principal GHS Lakarai Mohmand

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Self explained

Please forward to DCO Mohmand for early report on the issue as stated in Comm. Secy

8/3/2022