

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ **1148/2022** _____

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	22/07/2022	<p>The appeal of Mr. Muhammad Fayeen Khan presented today by Mr. Imdadullah Advocate. It is fixed for preliminary hearing before touring Single Bench at Swat on . Notices be issued to appellatant and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p>REGISTRAR</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 1148 of 2022

Muhammad Fayeem Khan PSHT (Primary School Head Teacher) Government
Primary School Jari Chinkolai/Dab, District Swat.

...Appellant

VERSUS

The Secretary Elementary and Secondary Education Department Government of
Khyber Pakhtunkhwa, Peshawar and Others.

...Respondents

INDEX

S #	Description of documents	Annexure	Pages
1.	Memo of Appeal	1-4
2.	Affidavit	5
3.	Addresses of the parties	6
4.	Copy of the Order dated 13-04-2022	A	7-8
5.	Copy of the Policy	B	9
6.	Copy of the Departmental Appeal	C	10
7.	Vakalat Nama	11

Appellant Through


Imdad Ullah

Advocate Swat

Office: Khan Plaza, Gulshone Chowk,
Mingora Swat, Cell 0333 929 7746

1

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _____ of 2022

Muhammad Fayeem Khan PSHT (Primary School Head
Teacher) Government Primary School Jari Chinkolai/Dab,
District Swat.

...Appellant

VERSUS

1. The Secretary Elementary and Secondary
Education Department Government of Khyber
Pakhtunkhwa, Peshawar.
2. The Director Elementary and Secondary Education
Government of Khyber Pakhtunkhwa, Peshawar.
3. The District Education Officer (Male) District
Swat.

...Respondents

SERVICE APPEAL UNDER SECTION 4
OF THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL ACT, 1974
AGAINST THE ORDER ENDST: NO.
6578-6703/PROMOTION/PSHT/2021-
2022 DATED 13-04-2022 WHEREBY THE
APPELLANT WAS PROMOTED AND
SUBSEQUENTLY POSTED AT GPS KOZ
KAD AGAINST THE CLEAR POLICY OF
THE GOVERNMENT, FEELING
AGGRIEVED FROM THE SAME TO THE
EXTENT OF ADJUSTMENT THE
APPELLANT PREFERRED A
DEPARTMENTAL APPEAL, BUT THE
SAME WAS NOT RESPONDED TO

DESPITE THE LAPSE OF STATUTORY
PERIOD OF TIME.

PRAYER:

That on acceptance of this appeal the order impugned may very kindly be modified to the extent of posting/adjustment of the Appellant from GPS Koz Kad to his own Union Council i.e. UC Janu as per the policy of the department.

Respectfully Sheweth:

Facts:

- i. *That the appellant joined the education department as PST and has regularly been performing his duties to the satisfaction of the authorities, as result the Appellant got promoted to the post of PSHT (Primary School Head Teacher).*
- ii. *That the Appellant was performing his duties as SPST (Senior Primary School Teacher) at GPS Jari Chinkolai/Dub.*
- iii. *That vide order Endst: No. 6578-6703/Promotion/PSHT/2021-2022 dated 13-04-2022 the Appellant got promoted to the post of PSHT (Primary School Head Teacher) BPS-15. Copy of the order dated 13-04-2022 is enclosed as Annexure "A".*

- iv. *That strange enough the Appellant was posted at GPS Koz Kad, outside the Union Council to which the Appellant belongs i.e. UC Janu.*
- v. *That as per the policy of the Provincial Government a teacher whose post is available in his own union Council so he will be adjusted / posted on the same, whereas in case of the Appellant the same has been ignored. Copy of the Policy is enclosed as Annexure "B".*
- vi. *That feeling aggrieved the Appellant preferred a departmental appeal for the redressal of his grievance, but the same was not responded to despite the lapse of statutory period of time. Copy of the Departmental Appeal is enclosed as Annexure "C".*
- vii. *That feeling aggrieved and having no other option this Honourable Tribunal is approached for the redressal of the grievance on the following grounds.*

Grounds:

- a. *That treatment in accordance with the law is the vested right of the Appellant, but the same has been denied to the Appellant bald of reasons. The Respondent Department has itself devised a policy and now has bulldozed the same in case of the Appellant, thus the Appellant has not been treated in accordance with the law.*

9

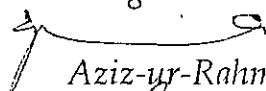
- b. That Appellant has been made to suffer to his utter detriment only to please the blue eyed and under political influence in utter negation of the law and rules on the subject.
- c. That the Appellant has been discriminated to his utter detriment. Moreover the Appellant had legitimate expectations to be posted in his own UC as per the policy, but alas the same denied to the Appellant.


It is, therefore, very respectfully prayed that on acceptance of this appeal the order impugned may very kindly be modified to the extent that the Appellant be ordered to be adjusted at his own union council as per the policy of the department.

Any other relief deemed appropriate in the circumstances and not specifically prayed for may also very kindly be granted.

Appellant

Muhammad Fayeem Khan
Through Counsels,


Aziz-ur-Rahman


Imdad Ullah
Advocates Swat

5

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _____ of 2022

Muhammad Fayeem Khan PSHT (Primary School Head
Teacher) Government Primary School Jari Chinkolai/Dab,
District Swat.

...Appellant

VERSUS

The Secretary Elementary and Secondary Education
Department Government of Khyber Pakhtunkhwa,
Peshawar and Others.

...Respondents

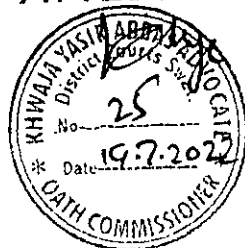
AFFIDAVIT

It is solemnly stated on Oath that all the contents of
this service appeal are true and correct to the best of my
knowledge and belief and nothing has either been
misstated or kept concealed before this Honourable
Tribunal. Moreover the no other such like appeal against
the same order and among the same parties is either
pending or decided by this Honourable Tribunal.

Deponent

Muhammad Fayeem Khan

ATTESTED



6

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _____ of 2022

Muhammad Fayeem Khan PSHT (Primary School Head
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...Appellant

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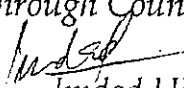
ADDRESSES OF THE PARTIES

Appellant:

Muhammad Fayeem Khan PSHT (Primary School Head
Teacher) Government Primary School Jari Chinkolai/Dab,
District Swat.

Respondents:

1. The Secretary Elementary and Secondary
Education Department Government of Khyber
Pakhtunkhwa, Peshawar.
2. The Director Elementary and Secondary Education
Government of Khyber Pakhtunkhwa, Peshawar.
3. The District Education Officer (Male) District
Swat.

Appellant
Through Counsel,

Imdad Ullah
Advocate Swat



OFFICE OF THE DISTRICT EDUCATION
OFFICER (MALE) AT GULKADA DISTRICT
SWAT

Phone/Fax No. 09469240228



Annexure.....

MA 7

OFFICE ORDER:

Consequent upon the recommendation of Departmental Promotion Committee and in pursuance to the notification of Govt. of Khyber Pakhtunkhwa E&SE Departmental Notification No.SO(PE)4-5/SSRC/Meeting/2012/Teaching cadre, Dated: 13/11/2012, the following Senior Primary School Teacher BPS-14 are hereby promoted to the post of Primary School Head Teacher (PSHT) BPS-15 @ Rs. (16120-1330-56020) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Govt. on the terms and conditions given below with immediate effect.

S.No	S/L NO	Name of Teacher	Present School	Circle	School where posted
1	39	Qadar Ali	GPS Qila Qalgai	Kabal	GPS Qila Qalgai
2	166	Rashid Ali	GPS M. Gul Shaheed	Mingora	GPS Parona
3	201	Shahi Dawran Khan	GPS Wainai	Matta/II	GPS Drab
4	310	Muhammad Israr	GPS Said Abad Bodigram	Matta/I	GPS Nal
5	373	Sardar wajj khan	GPS Chantalai No 2	K. Khela 1	GPS Topsisin
6	401	Nisar Ahmad	GPS Samer Daur	Charbagh	GPS Shoom Shangla
7	410	Sher Bahadar	GPS Bara Drushkhela Cham	Matta/I	GPS Dandanai
8	453	Mohammad Shoaib	GPS Zinkhanai	K. Khela 2	GPS Zinkhanai
9	500	Alam Sher Khan	GPS Dambara	K. Khela 1	GPS Shaloon
10	523	Aziz Un Nabi	GPS Jano	K. Khela 1	GPS Geray Dad
11	549	Sahib Gul	GPS No.1 Muthrapindai	Mingora	GPS kadoona
12	600	Alam Sher Khan	GPS Tarogay	K. Khela 1	GPS Tarogay
13	609	Adil Muhammad	GPS Dabargay	Bahrain	GPS Roo Shinkoo
14	630	Ali Sher	GPS Tikdarai	K. Khela 1	GPS Per Patay
15	643	Badar Munir	GPS Tikdarai	K. Khela 1	GPS Dab
16	670	Khog Bacha	GPS Dokada	K. Khela 2	GPS Bar achar
17	700	Mohammad Salim	GPS Golden	Kabal	GPS Mohammad Baig
18	725	Umar Ali	GPS Khwaza Khela	K. Khela 1	GPS Bar jabar
19	747	Salahud Din	GPS Nazar Abad	Matta/II	GPS Tangai Qalagay
20	802	Sabir Khan	GPS Dakorak	Charbagh	GPS Rarnota
21	803	Muhib ur Rahman	GPS Charbagh No1	Charbagh	GPS Jaikot
22	811	Abdul Ghafar	GPS Shahoo Kalam	Bahrain	GPS Kalam
23	869	Saleem Ahmad Khan	GPS Kala Kalay	Kabal	GPS Shalhand
24	872	Ali Sher	GPS Dambara	K. Khela 1	GPS Barkad
25	883	Syed Miftaluddin	GPS Mandan	Matta/I	GPS Beha
26	891	Abdul Ghaffar	GPS Zarinal	Bahrain	GPS Balakot
27	914	Amanullah Khan	GPS Panjigram	Mingora	GPS Samsaray
28	927	Abdul Kabir	GPS Faqira	K. Khela 1	GPS Bela karin
29	938	Muhammad Sher	GPS Galshah	Matta/I	GPS Aryanai No.2
30	959	Asad Khalil	GPS Charbagh No 2	Charbagh	GPS Makad
31	977	Tariq Kalim	GPS Dheral Tangar	Matta/II	GPS Radokrai
32					

Attested
Advocate

34	997	Siraj ul Haq	GPS Mufaday	Matta/II	GPS Muraday
35	1006	Yad Badshah	GPS Jehan Abad	Charbagh	GPS Zaray
36	1017	Gul Zada	GPS Gulkada	Mingora	GPS Bar Baligram
37	1025	Zafar Ali	GPS Bahrain	Bahrain	GPS Lalshesh
38	1051	Javid Iqbal Khan	GPS Malragai	Mingora	GPS No.2 Sangar
39	1052	Mustafa Khan	GPS Foladay	Mingora	GPS Kuz Geshar
40	1081	Farooq Ali	GPS Sapal Bandai	Mingora	GPS Saleem khan
41	1126	Akhtar Ali	GPS Koza Asala	K. Khela 2	GPS Chinawat
42	1142	Hazrat Ali	GPS Akhun Kalay	Kabal	GPS Qambo
43	1144	Fazal Rabbi	GPS Kasoona	K. khela 2	GPS Kalwara
44	1145	Muhammad Zahir Khan	GPS Matai Shinkad	Charbagh	GPS Shinkad
45	1147	Muhammad Sher Ali Khan	GPS Koza Drushkhela	Matta/I	GPS Saidara Bala
46	1149	Mian Ali Zeb Bacha	GPS Bara Drushkhela	Matta/I	GPS Kabalkoo
47	1150	Muhammad Payeen Khan	GPS Jari Chinkolai	K. Khela 1	GPS Koz kad
48	1151	Fazal Hadi	GPS Bandai Attached	Kabal	GPS Tootbanarai
49	1152	Ghani Rahman	GPS No.2 Faiz Abad	Mingora	GPS Tospin
50	1154	Haidar Ali	GPS Tall	Kabal	GPS Dardyal
51	1155	Muhammad Taqi	GPS Asharay	Matta/I	GPS Asharay
52	1156	Muhammad Sardar	GPS Parkhay	Charbagh	GPS Wara Sar
53	1157	Muhammad Sadiq	GPS Azad Banda	Matta/I	GPS Kargay
54	1158	Ihsanullah	GPS Baidara No. 1	Matta/I	GPS Mairamai
55	1159	Fazal Khitab	GPS Bara Gat	Kabal	GPS Pir Patai
56	1160	Abdullah	GPS No.2 Mingora	Mingora	GPS Neshkafar
57	1161	Mushtaq Ahmad	GPS No.3 Mingora	Mingora	GPS No.3 Mingora
58	1163	Himayat ullah	GPS Hazara	Kabal	GPS Yarkanai
59	1164	Rahimullah	GPS Galooch No:1	Kabal	GPS Megi
60	1165	Nawab Shah	GPS Gwalera	Matta/II	GPS Shingartan
61	1166	Muhammad Habibullah	GPS Panawrai	Kabal	GPS Panawrai
62	1167	Dakht Rawan	GPS Bacha Dherai	K. khela 2	GPS Sharna
63	1170	Khurshed Iqbal	GPS Mam Dehrai	Kabal	GPS Naranjpora No.2
64	1171	Hayat Ali	GPS Belo Khwar	Kabal	GPS Serai Shah Dherai
65	1172	Israr Hussain	GPS No 1 Chamtalai	K. Khela 1	GPS Uzbaka
66	1173	Shahid Khan	GPS Malooch #2	Kabal	GPS Painsa Shah Patai
67	1174	Khalid Khan	GPS No.1 Mingora	Mingora	GPS Sangar No.1
68	1176	Jauhar Iqbal	GPS Charma	Matta/II	GPS Barabro
69	1178	Muhammad Asghar	GPS Dagai	Matta/II	GPS Manro Patai
70	1180	Abdul Qayum	GPS Karakar	Barikot	GPS Nawagai
71	1181	Bakht-Mohd Khan	GPS Matta	Matta/I	GPS Saidara
72	1182	Samiur Rahman	GPS Mankyal	Bahrain	GPS Asrit
73	1183	Akhtar Ali	GPS Gujar Tangay	Mingora	GPS Jaloo
74	1188	Bawar Khan	GPS Main Bela	Kabal	GPS Mianz Khpa
75	1189	Wahid Gul	GPS Chitor	Mingora	GPS Bar Geshar
76	1191	Waliullah	GMPS Chandan Dherai	Kabal	GPS Shahi Bagh
77	1192	Zia Ur Rahman	GPS Goda	Kabal	GPS Pachakalay
78	1193	Rahmat Zeb	GPS Yaka Badesha	K. khela 2	GPS Mandan
79	1194	Sardar Ali	GPS Manai	Kabal	GPS Manai
80	1197	Anwar Zarin	GPS Doghlai	Matta/II	GPS Onra Dherai

2024/04/10

8

82	1198	Mohd Ishaq	GPS Ghorajoo	Kabal	GPS Asho Barai
	1199	Robul Amin	GPS Akbar Abad	Mingora	GPS Shallaloo
83	1200	Habib Ullah	GPS Churkhal	Barikot	GPS Amlook Dara
84	1201	Syed Ghaffar	GMPS Soray Jolie	Matta/II	GPS Chitkarai
85	1203	Abdullah	GPS Deolai No.1	Kabal	GPS Shagai Bawrai
86	1204	Rashid Iqbal	GPS Cham Shalpin	K. Khela 1	GPS Dab
87	1206	Abdullah Khan	GPS Talkar	Matta/II	GPS Shandal
88	1207	Mohd Anwar	GPS Jaba Pisal	K. Khela 2	GPS No-02 Achar
89	1208	Muhammad Tasnim ul Haq	GPS Qachara Pla	Matta/II	GPS Awisha
90	1209	Tayab Bacha	GPS Nawekalay	Barikot	GPS Aboha No. 1
91	1211	Babar Sadiq	GPS Saland	Matta/II	GPS Awarai Gat
92	1216	Mohd Shafi	GPS Kar Galao*	Bahrain	GPS Kar Galao
93	1217	Rasheed Ahmad	GPS Golden	Kabal	GPS Seekai
94	1218	Khan Gul	GPS Fazal Abad (D)	Kabal	GPS Sar Khazana
95	1219	Salimullah	GPS Shah Dehrai	Kabal	GPS Katyar
96	1220	Iqbal Hakim	GPS Manai	Kabal	GPS Bela Archalai
97	1221	Peer Mohammad Khan	GPS Elmanai	K. Khela 1	GPS Sardaray
98	1222	Azmat Ali Khan	GPS Labat	Matta/II	GPS Bakoor
99	1223	Noorullah	GPS Sakhra	Matta/I	GPS Sia
100	1224	Bashir Ahmad	GPS Kora	Barikot	GPS Kota
101	1225	Noor Nabi	GPS Nilagram	Matta/II	GPS Mian Kalay
102	1226	Rahmat ali	GPS Daalahara	Kabal	GPS Garrai
103	1227	Muhammad Hussain	GPS Talang	Barikot	GPS Talang
104	1228	Ilmi Amin	GPS Madyan	Bahrain	GPS Madyan
105	1229	Mian Sayed Ghafar	GPS Kishawra	Charbagh	GPS Serai
106	1230	Khalsta Khan	GPS Kasoona	K.khela 2	GPS Khwar Shagram
107	1232	Said Ali Shah	GPS Ali Grama	Kabal	GPS Sarbala
108	1233	Alam Sher	GPS Fazal Baig	Matta/I	GPS Malak Patai
109	1234	Mohd Sajjad	GPS Dabargay	Bahrain	GPS Bala Garrai
110	1236	Bacha Hussain	GPS Amankot	Mingora	GPS Kharawy
111	1238	Anwar Sadaat	GPS Arkot	Matta/II	GPS Ochrai
112	1239	Nadeem Iqbal	GPS Nilagram	Matta/II	GPS Nemakai
113	1240	Inamur Rahman	GPS Nilagram	Matta/II	GPS Awar Patai
114	1241	Ahmad Zeb	GPS Chafi	Bahrain	GPS Zoor Chail
115	1242	Fazal Rabbi	GPS Madyan	Bahrain	GPS Kwanda
116	1243	Main Yousaf Shah	GPS Gadi	Kabal	GPS Yakhtangay
117	1246	Alam Iqbal	GPS Ayeen	Bahrain	GPS Chilam Ramit
118	1247	Amjad Ali Khan	GPS Matai Shinkad	Charbagh	GPS Shingarai
119	1248	Shah Khalid	GPS Urdan	K. Khela 1	GPS Soorbanr
120	1250	Muhammad Naeem	GPS Bara Sakhra	Matta/I	GPS Kharkai
121	1251	Amjad	GPS Sijbar	Matta/II	GPS Bahadar Banda
122	1252	Ubaidullah	GPS Deolai No.1	Kabal	GPS Tangbanr
123	1254	Manzoor Ahmad	GPS Giri Lagan	Bahrain	GPS Bar Kedani
124	1255	Sultan Mehmood	GPS Dashigram	Bahrain	GPS Tangay Banda
125	1256	Khan Shahzada	GPS Mandour	Matta/I	GPS Mabanr

Attested
 TERMS AND CONDITIONS:
 Under

- Pakhtunkhwa.
3. Their services can be terminated at any time, if their performance is found unsatisfactory during the probation period.
 4. In case of misconduct, they shall be preceded under the rules framed from time to time by the Govt. of Khyber Pakhtunkhwa.
 5. Charge reports should be submitted to all concerned.
 6. No TA/DA is allowed for joining the duties.
 7. In case of any disciplinary or miss-reporting found in the academic/ professional documents in respect of the above officials, their promotion shall stand cancelled.

(MUHAMMAD RIAZ)
DISTRICT EDUCATION OFFICER (M)
DISTRICT SWAT
Dated: 13/04/2022

Enlist: No: 6578-6703/Promotion/PSHT/2021-2022

Copy to:

- 1) Director E&SE Khyber Pakhtunkhwa Peshawar.
- 2) District Comptroller of Accounts Swat.
- 3) The DMO (EMA) Swat.
- 4) Sub-Divisional Education Officers (M) Babozi, Kabal, Matta, Charbagh, Barikot, Bahrain & Khwaza khela Swat.
- 5) PA to DEO (M) office.
- 6) The teachers concerned.

no

no

Liaqat Ali:

10

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DISTRICT EDUCATION OFFICER (M)
DISTRICT SWAT

0345 9413374



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

PH No. 091-9201389, 9210938,
9210437, 9210957, 9210468
Fax 091-9210936 0800-32857
No. 2412-2521 // Promotion/Estab
Dated Peshawar the 15/01/2013.

Annexure ²B²
9

To
All the District Education Officers,
(Male & Female), in Khyber Pakhtunkhwa.

Subject: Guidelines for Posting of PST B-12 on Promotion to the post of Senior PST B-14 and PSHT B-15, Qari B-12 to B-15, CT B-15 to Senior CT B-16, AT B-15 to Senior AT B-16, TT-15 to Senior TT B-16, DM B-15 to Senior DM B-16 and PET B-15 to Senior PET B-16.

Memo: I am directed to refer to the subject noted above and to clarify that posts of PST B-12 /Senior PST B-14/PSHT B-15 may be rationalized and re-distributed among the Primary schools in the following manner and on Promotion of PST B-12 to the post of Senior PST B-14 and PSHT B-15, may be posted as under:-

Up gradation of Posts in Primary Schools (Female) After Rationalization @ 1-40 ratio											
S.No	School Code	Name of Primary School	Total Enrolment	Sanctioned Posts after Rationalization							
				SST B-16	CT B-15	PSHT B-15	SPST B-14	1ST B-12	NQ	Other	Chow
1	25288	GGPMS A (JICA)	208	1	2	0	2	3	1	1	1
2	25045	GGPMS B (JICA)	306	1	2	0	2	6	1	1	1
3	25113	GGCMS C	173	1	0	0	2	3	1	1	1
4	30050	GGPS D	50	0	0	1	0	1	0	0	1
5	25224	GGPS E	110	0	0	1	1	1	0	0	1
6	25241	GGPS F	160	0	0	1	1	2	0	0	1
7	25277	GGPS G	198	0	0	1	1	3	0	0	1
8	25221	GGPS H	240	0	0	1	2	3	0	0	1
9	32912	GGPS I	285	0	0	1	2	4	0	0	1
10	25097	GGPS J	320	0	0	1	2	5	0	0	1
11	25138	GGPS K	360	0	0	1	2	6	0	0	1
12	32606	GGPS L	400	0	0	1	3	6	0	0	1
13	25278	GGPS M	440	0	0	1	3	7	0	0	1
Total			3250	3	4	10	23	50	3	3	13

Up gradation of Posts in Primary Schools (Male) After Rationalization @ 1-40 ratio							
S.No	School Code	Name of Primary School	Total Enrolment	Sanctioned Posts after Rationalization			
				PSHT B-15	SPST B-14	PST B-12	Chow
1	30056	GPS A	50	1	0	1	1
2	25284	GPS B	110	1	1	1	1
3	25241	GPS C	160	1	1	1	1
4	25277	GPS D	198	1	1	1	1
5	25221	GPS E	240	1	2	1	1
6	32912	GPS F	285	1	2	1	1
7	25097	GPS G	320	1	2	1	1
8	25138	GPS H	360	1	2	1	1
9	32606	GPS I	400	1	3	1	1
10	25278	GPS J	440	1	3	1	1

Attested

[Signature]
Advocate

1	15913	GPS D	250				
2	2585	GPS E	255				
3	2585	GPS G	120				
4	25130	GPS H	350				
5	32000	GPS I	400				
6	25278	GPS J	440				
Total			2563	10	17	38	10

Note:-

1. Each Primary School (except JICA & Community Model School where SST post is sanctioned) will have one post of PSHT B-15.
2. There will be no post of PSHT B-15 & SPST B-14 in MPS.
3. No of posts of PSHT B-15, SPST B-14 & PST B-12 will not exceed the already communicated sanctioned posts.

Posting on Promotion

4. On Promotion of PST B-12 to the post of Senior PST B-14 and PSHT B-15, may be posted in the same UCs Subject to the provisions of sanctioned post,
5. Senior most PSHT B-15, SPST B-14 & PST B-12 (According to the Seniority list) may be retained in the school of their present posting and junior most may be transferred to other schools.
6. In their promotion order it should be maintained that senior-most Seniority on promotion will remain intact.
7. If anyone forego promotion, Entry to this effect may be made in his/her Service book.
8. Minimum qualifications for the above posts have already been prescribed in the Service Rules notified vide Government of Khyber Pakhtunkhwa Elementary and Secondary Education Department Notification No. SO (PE) 4-5/SSRC/Meeting/2012/Teaching Cadre Dated the November 13, 2012.

I am further directed to further clarify that:

1. On promotion Qari B-12 to the post of Senior Qari B-15, CT B-15 to Senior CT B-16, AT B-15 to Senior AT B-16, TT-15 to Senior TT B-16, DM B-15 to Senior DM B-16 and PET B-15 to Senior PET B-16, will be posted in High and Higher Secondary Schools.
2. 1/3 Qari B-12 posts will be upgraded to Senior Qari B-15, CT B-15 to Senior CT B-16, AT B-15 to Senior AT B-16, TT-15 to Senior TT B-16, DM B-15 to Senior DM B-16 and PET B-15 to Senior PET B-16 in High and Higher Secondary Schools only in Elementary and Secondary Education Department at District Level.
3. No post of CT B-15, PET B-15, AT B-15, DM B-15, TT-15, will be upgraded to B-16 in Middle Schools.
4. Senior most Senior CT B-16, Senior AT B-16, Senior DM B-16, Senior PET B-16, Senior TT B-16 (According to the Seniority list) may be retained in the schools of their present posting and junior most may be transferred to other schools.
- 5.

(Signature)

Dy: Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

Endst: No. / File No. 1/A-88/KC/S.list : Dated Peshawar the 18/01/2013.

Copy forwarded for information and necessary action to the:-

1. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department
2. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
3. M/File

Dy: Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

10

خدمت جناب ڈسٹرکٹ ایکوشن آفیسر مردانہ ضلع سوات
درخواست میراڈ PSHT کا پروموشن آرڈر GPS ڈب میں
کیا جائے۔

"C"

Annexure

جناب عالی!

مردانہ ٹرانس ہے کہ سائل بحیثیت SPST انچارج ٹورنٹ ڈسٹرکٹ
سکول ڈب چینگولی یونین کونسل چالو، چنگولی میں انیٹھرا لائن سہرا نام
دے رہا ہے

جناب والہ! اسی ہی سکول میں PSHT کا پوسٹ عہدہ دراز سے چالی ہے
اور آپ کی چالی ہے حال ہی میں PSHT کا پروموشن آرڈر تواج
میں میں سائل اس سکول سے دور دراز علاقے میں پروموشن کیا گیا ہے
چونکہ سائل ویدج کونسل ڈب چینگولی میں رہائش پذیر ہے اور
اسی ہی یونین کونسل سے تعلق رکھتا ہے اسی بنا پر سہرا نام
سائل کا حق بننا ہے کہ پروموشن آرڈر GPS ڈب میں

کیا جائے۔
لہذا آپ صاحبان سے استدعا ہے کہ اس میں اپیل کو منظور کر کے مکمل
طور پر عمل میں لائے تاکہ انصاف کا سہرا نام تو عین توازن ہوگی

الغرض

محمد عارف خان SPST انچارج GPS ڈب چینگولی ضلع سوات
تھان چینگولی سہرا نام 1 خزانہ سوات

سہرا نام 47 سہرا نام 150

0345 9413374

1403
14/4/22

Federal Milkcan,
Govt. Primary School
Dab Distt: Swat,
Code No. 37251

Attested
Advocate

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

In the matter of:-

Muhammad Fayez Khan Appellant

VERSUS

The Secretary EQSE Respondent 5
and others

KNOWN ALL to whom these present shall come that I/we, the undersigned appoint

AZIZ-UR-RAHMAN and IMDAD ULLAH

Advocates High Court

To be the advocate for the Appellant in the above mentioned case to do all the following acts, deeds and things or any one of them, that is to say:-

- ❖ To acts, appear and plead in the above mentioned case in this court or any other Court in which the same may be tried or heard in the first instance or in appeal or review or revision or execution or at any other stage of its progress until its final decision.
- ❖ To present pleadings, appeals, cross objections or petitions for execution review, revision, withdrawal, compromise or other petition or affidavits or other documents as shall be deemed necessary or advisable for the prosecution of the said case in all its stages.
- ❖ To withdraw or compromise the said or submit to arbitration any difference or dispute that may arise touching or in any manner relating to the said case.
- ❖ To receive money and grant receipts therefore, and to do all other acts and things which may be necessary to be done for the progress and in the course of the prosecution of the said case.
- ❖ To employ any other Legal Practitioner authorizing him to exercise the power and authority hereby conferred on the Advocate wherever he may think fit to do so.
- ❖ I understand that the services of aforesaid lawyer are hired irrespective of the outcome of the case.

And I/We hereby agreed to ratify whatever the advocate or his substitute shall do in the premises.

And I/We hereby agree not to hold the Advocate or his substitute responsible for the result of the said case in consequences of his absence from the Court when the said case is called up for hearing.

And I/We hereby agree that in the event of the whole or any part of the fee agreed by me/us to be paid to the Advocate remaining unpaid, the Advocate shall be entitled to withdraw from the prosecution of the case until the same is paid.

IN THE WITNESS WHEREOF I/WE hereunto set my/our hand(s) to these present the contents which have been explained to and understood by me/us, this ____ day of ____ 2021.

(Signature or thumb impression)

(Signature or thumb impression)

(Signature or thumb impression)

Accepted subject to terms regarding fees

AZIZ-UR-RAHMAN

Advocate High Court

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G.T. Road Mingora, District Swat.

Cell No. 0300 907 0671

IMDAD ULLAH

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