





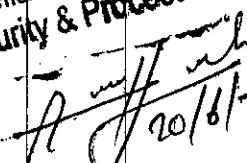
Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 831/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	26/05/2022	<p>The appeal of Mr. Waheedullah resubmitted today by Mr. Saadullah Khan Marwat Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR,</p>
2-	1-6-2022  20.06.2022	<p>This case is entrusted to Single Bench at Peshawar for preliminary hearing to be put there on <u>20.6.22</u>. Notices be issued to appellant and his counsel for the date fixed.</p> <p> CHAIRMAN</p> <p>Counsel for the appellant present. Preliminary arguments heard. Record perused.</p> <p>Points raised need consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of reply/comments. To come up for reply/comments on 02.08.2022 before S.B.</p> <p> (Fareeha Paul) Member(E)</p>

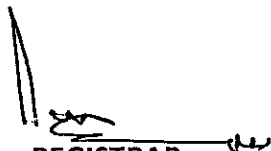
Rs-600/-
Appellant Deposited
Security & Process Fee

20/6/22

The appeal of Mr. Waheedullah son of Mir Jehangdad Khan Chowkidar GHSS Mamash Khel Bannu received today i.e. on 17.05.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Check list is not attached with the appeal.
- 2- Appeal has not been flagged/marked with annexures marks.
- 3- Annexures of the appeal may be attested.
- 4- Affidavit may be got attested by the Oath Commissioner.
- 5- Copy of departmental appeal against the impugned promotion order is not attached with the appeal which may be placed on it.
- 6- Annexure-E&F of the appeal are illegible which may be replaced by legible/better one.
- 7- Seven more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.


No. 1073 /S.T,

Dt. 18-05 /2022


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Saadullah Khan Marwat Adv. Pesh.

Sir,
Re-submitted after removing the
objections.


25-05-22

BEFORE THE KPK SERVICE TRIBUNAL PESHAWARS.A. No. 831 /2022

Waheed Ullah

versus

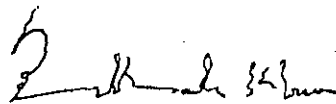
DEO (M) & Others

I N D E X

S. No.	Documents Descriptions	Annex	Page #
1	Memo of Appeal		1-4
2	Education Qualification	"A"	5-6
3	Appointment order dated 15-06-2005	"B"	7
4	Amendment in Rules dated 18-07-2019	"C"	8-10
5	Seniority list dated 31-01-2020	"D"	11-17
6	Promotion order of R. No. 04 and 05 dated 14-03-2020	"E"	18
7	Representation dated 20-04-2020	"F"	19
8	Writ Petition dated 08-06-2020	"G"	20-22
9	Exemption letter from typing test dated 16-04-2021	"H"	23
10	Court order dated 20-04-2022	"I"	24-25

Appellant

Through



Saadullah Khan Marwat

Advocate
21-A, Nasir Mansion,
Shoba Bazaar, Peshawar

Dated 16-05-2022

Ph: 0300-5872676

BEFORE THE KP SERVICE TRIBUNAL, PESHAWAR

Appeal No. _____/2022

Waheed Ullah S/O Mir Jehandad Khan,

Chowkidar, GHSS Mamash Khel.

Bannu Appellant(s)

VersesKhyber Pakhtunkhwa
Service TribunalEntry No. 794Dated 17/05/2022

1. District Education Officer (M),
Elementary & Secondary
Education Department,
Bannu.
2. Director, Elementary & Secondary
Education Department, GT Road
Hashtnagri, Peshawar City.
3. Secretary, Elementary & Secondary
Education Department, Govt. of KP,
Civil Secretariat, Peshawar.
4. Hameed Ullah Khan, Junior Clerk,
GHSS Abdul Hameed Noor Jani Khel,
Bannu Respondent(s)

⇔<=>⇔<=>⇔<=>⇔<=>⇔

**APPEAL UNDER SECTION 4 OF THE SERVICE
TRIBUNAL ACT, 1974 AGAINST OFFICE ORDER
NO. 3371-80 DATED 14-03-2020 OF R. NO. 01
WHEREBY R. NO. 04 & 05 WERE PROMOTED TO
THE POST OF JUNIOR CLERKS AND APPELLANT
BEING SENIOR WAS IGNORED FOR NO LEGAL
REASON.**

⇔<=>⇔<=>⇔<=>⇔<=>⇔=

Filed to-day

Registrar

17/5/2022

Respected Sir:

1. That appellant has into his credit the education qualification up to FA. (Copy as annex "A")
2. That on 15-06-2005, appellant was appointed as Chowkidar and is performing his official duties for the last 17 years as such. (Copy as annex "B")
3. That on 18-07-2019, the Government of KP issued Notification where amendment was brought in KP Civil Servants (Appointment, Promotion & Transfer) Rules, 1989 where method of appointment and promotion to the post of Junior Clerk was made / enumerated:-
 - a. Forty (40%) by promotion, on the basis of seniority-cum-fitness, from amongst Daftaries, Gestetner, Operators, Qasids and Naib Qasids including holding of other equivalent post in the Secretariat with two (02) years services as such, who have passed FA / F. Sc examination or its equivalent qualification form a recognized Board; and
 - b. 60% by initial recruitment. (Copy as Annex "C")

Here it would be not out of place to mention that condition of typing skill / knowledge is not applicable for Class-IV seeking promotion to the post of Junior Clerk B-11 against 33% reserved quota.
4. That on 31-01-2020, Final Seniority List of Class-IV for promotion to Junior Clerk in district Bannu was maintained. Name of appellant was figured at S. No. 126, while R. No. 04 Hameed Ullah Khan at S. No. 105 appointed on 30-08-2009. (Copy as Annex "D")
5. That on 14-03-2020, R. No. 04 and 05 were promoted to the post of Junior Clerks against law and rules, being most juniors. (Copy as Annex "E")
6. That on 20-04-2020, appellant submitted representation before R. No. 02 which met dead response. (Copy as annex "F")

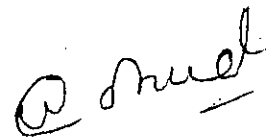
7. That on 08-06-2020, appellant then filed Writ Petition before Peshawar High Court, Bench Bannu for setting aside of the impugned Notification order dated 14-03-2020 and to promote him to the post of Junior Clerk. (Copy as Annex "G")
8. That on 16-04-2021, R. No. 03 issued memo whereby it was held that no condition of typing test exists for the promotion of Class-IV employees as per letter dated 26-11-2018 of the Regulation Wing of Establishment Department. (Copy as annex "H")
9. That the said Writ Petition came up for hearing on 20-04-2022 and then the hon'ble Bench was pleased to direct appellant to approach before Service Tribunal in accordance with law. (Copy as annex "I")

Hence, this appeal, inter alia on the following grounds:

GROUND S.


- a. That in the seniority list dated 31-01-2020 name of appellant was figured at S. No. 126 but in fact the same comes at S. No 14 as he was appointed as such on 15-06-2005 while that of R. No. 04 at S. No. 105 appointed on 30-08-2009, meaning thereby that appellant is much senior than the promoted respondent.
- b. That method of promotion is enumerated in the rules, seniority-cum-fitness. No reason for non promotion to the appellant was ever given. Thus R. No. 04 and 05 was promoted to the post of Junior Clerk with closed eyes and against the rules.
- c. That extra ordinary favoritism was shown to R. No. 04 and 05 in promotion because the matter was not dealt with as per the mandate of law.
- d. That no limitation ever runs against factum of promotion, seniority and money matter. The promotion of R. No. 04 and 05 was based on favoritism as well as with malafide.


It is, therefore, most humbly prayed that on acceptance of the appeal, order dated 14-03-2020 of R. No. 01 promoting R. No. 04 to the post of Junior Clerk be set aside and appellant be promoted to the post of Junior Clerk with effect from 14-03-2020 with all service benefits.



Appellant

Through


 Saadullah Khan Marwat


 Arbab Saiful Kamal

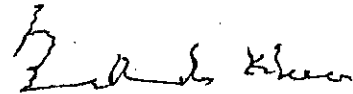

 Amjad Nawaz

Advocates

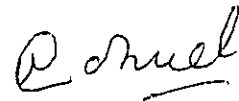
Dated: 16-05-2022

CERTIFICATE:

As per instructions of my client, no such like Service Appeal has been earlier filed by the appellant before this Hon'ble Tribunal.


 Advocate
AFFIDAVIT

I, Waheed Ullah S/O Mir Jehandad Khan, Chowkidar, GHSS Mamash Khel. Bannu (appellant), do hereby solemnly affirm and declare that contents of **Service Appeal** are true and correct to the best of my knowledge and belief



DEPONENT

AS

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

BN 0885

Roll No. 53038



Bannu N.W.F.P Pakistan

Secondary School Certificate Examination

SECTION TWO (SUBJECTS)

THIS IS TO CERTIFY THAT WAHEEDULLAH KHAN

Son/Daughter of MIR JEHAN DAD and a student of DISTRICT BANNU.

has passed the Secondary School Certificate Examination of the Board of Intermediate & Secondary Education, Bannu.

as a ~~XXXXXX~~ candidate. He/She obtained 393 Marks out of 850 and has been placed in Grade D Representing FAIR

The Candidate passed in the following subjects.

- 1. English 2. Urdu 3. Islamiyat 4. Pakistan Studies 5. MATHEMATICS 6. PHYSICS 7. CHEMISTRY 8. BIOLOGY.

He/She has been awarded Grade / on the basis of Internal assessment by the Institution concerned.

Date of birth according to admission form is SEVENTH NOVEMBER, one thousand nine hundred and EIGHTY FOUR. (07/11/1981.)

Under Assst. Secretary

Signature of Assst. Secretary

This certificate is issued without alteration or erasure.

Alex H2 GISS Nazam Bannu

6

SNo : 204022084

Roll No : 22084

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION, BANNU



Provisional Certificate

Intermediate Examination
SESSION 2004 Annual

Humanities Group

This is to Certify that Waheed Ullah Khan

Son of Mir Jehandad Khan

student of Bannu District

Registration No: _____ has passed the *Intermediate Examination* of the

Board of Intermediate & Secondary Education, BANNU held in *May, 2004* as a *Private* candidate

He obtained *461* marks out of *1100* and has been placed in Grade "*D*"

Prepared by [Signature] Compiled by [Signature]

Checked by [Signature]

Date of Issue: 31-7-2004

[Signature]
Assy Secretary (Certificate)

Khaksar and BRAINS Software Enterprise (KBSoft)

(H.N.R) Computer CELL BISE, Bannu

[Signature]
Senior Staff EPS-16
GHSS Mamash Khel
Bannu

07

OFFICE OF THE EXECUTIVE DISTRICT OFFICER SCHOOLS & LITERACY BANNU

APPOINTMENT ORDER

Consequent upon the approval of the competent authority Vide No 556° -DCO/Estab: Dated 12/06/2005 the undersigned is pleased to issue order of appointment/posting in respect of the following Class-IV on fixed pay @RS 3100/- P.M. fixed against the vacant posts in the schools mentioned against each in the best interest of public service from the date of taking over charge subject to the terms/conditions below.

S/No	Name, Father, 's Name/Address	Post	Place of Posting	Remarks
1	Mr. Wahidullah Khan S/O Mr. Jahan Dad Khan R/O Malik Sakhi Jan Mamash Khel Bannu	Chowkidar	Govt: Higher Secondary School Mamash Khel Bannu	V/Post

TERMS & CONDITIONS

1. The appointment of the candidates mentioned above will be subject to the conditions that they are the domicile of Bannu
2. Their appointments are on fixed pay of RS 3100/- per month.
3. The undersigned reserves the rights of amendment in the appointment order, in case any wrong information is detected.
4. The candidate will be required to sign the contract agreement on the prescribed proforma before taking over the charge in their respective schools.
5. Charge report should be submitted to all concerned.
6. Their services are liable to be terminated by the competent authority without any prior notice.
7. They will produce age & Health certificates from Medical authority before taking over charge.
8. No TADA is allowed

Sd/-
(MUHAMMAD ISMAIL SHAH)
Executive District Officer
Schools & Literacy Bannu
Dated Bannu the 12/06/2005

Endstt No 24095-103 /ADO (Estab:) Pny
Copy Forwarded to the

1. The District Coordination Officer Bannu W/R to his No 556° Estt: Dated 12/06/2005
2. Director Schools & Literacy NWFP Peshawar
3. The District Account Officer Bannu
4. District Officer (M) Bannu
5. Appointee concerned
6. Manager District Employment Exchange Bannu.
7. Dy: Director Information Department Bannu.
8. Principal GHSS Mamash Khel Bannu.
9. Dy District Officer (M) Bannu

Ahmed
H
Principal
GHSS Mamash
Bannu

Ok
Executive District Officer
Schools & Literacy Bannu



GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
(ESTABLISHMENT WING)

Dated Peshawar, the 18th July, 2019

NOTIFICATION

No.SOE.IV(E&AD)/1-35/2014:-

In pursuance of the provisions contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Establishment and Administration Department, in consultation with the Finance Department, is hereby directs that in this Department's Notification No.SOE.IV (E&AD)/1-35/2012 dated 6th December, 2012, the following amendments shall be made, namely:

AMENDMENTS

In the APPENDIX, for Serial No.4, the following shall be substituted, namely:

1.	2.	3.	4.	5.
4.	Junior Clerk.	(i) FA/ F.Sc with second division or equivalent qualification from a recognized Board; and (ii) a speed of thirty (30) words per minute in typing.	18 to 30 years.	(a) Forty per cent by promotion, on the basis of seniority-cum-fitness, from amongst Daftaris, Gestetner Operators, Qasids and Naib Qasids including holders of other equivalent posts in the Secretariat with two years service as such, who have passed FA/F.Sc Examination or its equivalent qualification from a recognized Board; and (b) sixty per cent by initial recruitment. <u>Note:</u> For the purpose of promotion, there shall be maintained a common seniority list of Daftaries, Gestetner Operators, Qasids, Naib Qasids etc. with reference to the dates of their acquiring the FA/ F.Sc qualification:

1.	2.	3.	4.	5.
<p style="text-align: center;">2</p> <p style="text-align: center;">PW</p>				<p>Provided that-</p> <p>(i) if two or more officials have acquired the FA/F.Sc qualification in the same session, the inter se seniority in the lower post shall be maintained for the purpose of determining seniority in the higher post.</p> <p>(ii) where a senior official does not possess the requisite qualification at the time of filling up a vacancy, the official next junior to him possessing the requisite qualification shall be promoted in preference to the senior official or officials:</p> <p>Provided further that The condition of FA/F.Sc or its equivalent qualification from a recognized Board, as laid down at clause (a) shall not apply for a period of four years from the date of commencement of this Notification to the existing matriculate incumbents of the post of Daftaris, Gestetner Operators, Qasids and Naib Qasids including holders of other equivalent posts for promotion to the post of Junior Clerk (BS-11)."</p>

CHIEF SECRETARY
KHYBER PAKHTUNKHWA

Encls: No. SOE-IV(E&AD)/1-35/2014, dated 18th July, 2019

Copy forwarded for information and necessary action to: -

1. All Administrative Secretaries to Government of Khyber Pakhtunkhwa, Civil Secretariat, Khyber Pakhtunkhwa, Peshawar.
2. The Senior Member of Board of Revenue.
3. The Principal Secretary to Governor, Governor's Secretariat, Khyber Pakhtunkhwa
4. The Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
5. The Secretary Provincial Assembly, Khyber Pakhtunkhwa.
6. The Secretary, Khyber Pakhtunkhwa Public Service Commission.
7. Deputy Director (IT), Establishment & Administration Department with the request to upload on the official website.
8. PS to Chief Secretary Khyber Pakhtunkhwa.
9. PS to Secretary Establishment Department.
10. PS to Special Secretary (Estt), Establishment Department.
11. PS to Special Secretary (Reg), Establishment Department.
12. PA to Addl: Secretary (Estt/ Reg), Establishment Department.
13. PA to Addl: Secretary (HRD Wing) Establishment Department.
14. All the Deputy Secretaries in Establishment Department.
15. All Section Officers, Establishment Department, Khyber Pakhtunkhwa Peshawar.
16. The Manager Government Printing Press for publication in the Extra Ordinary Gazette with the request to provide 50 copies of Gazette.


(HAZRAT JAMAT)
SECTION OFFICER (E-IV)

OFFICE OF THE DISTRICT EDUCATION OFFICER MALE BANNU

FINAL SENIORITY LIST OF CLASS-IV FOR PROMOTION TO J/CLERK IN DISTRICT BANNU UPDATED 31-01-2020 (Not valid for court)

Sr. No.	Name	School/Office	Designation	BPS	D/O/Birth	JO/1st Appointmen	Qualification	FA Passing Year
					06-05-65	01-09-89	FA	1985
1	MURAD ALI KHAN	GPS DEGAN KHAASS	Chowkidar	2	08-02-72	29-04-92	FA	11-10-92
2	Mohammad Ishaq	GPS Panz khoni khel	Chowkidar	2	14-10-1968	01-01-94	FA	01-01-89
3	ABDUL GAYUUM	GPS IMTIAZ KHUJRAM KHEL	CHOWKIDAR	2	03-01-74	25-04-90	FA	18-03-95
4	ABDUL SAMAD KHAN	GPS SABO KHEL ABDUL QAYUM	N/Qasid	2	10-05-72	11-05-96	FA	1995
5	Dil Faraz Khan	GHS Bazar Ahmad Khan Bannu	Chowkidar	2	25-02-61	04-11-96	FA	04-03-81
6	GUL AJAB NOOR	GPS SHAHBAZ KAKKI NO.2	Chowkidar	2	19-01-71	04-11-97	FA	1991
7	Dilabaz Khan	GPS Zabar Dasl Mandew	Chowkidar	2	09-04-71	09-01-98	FA	01-07-90
8	IRFANULLAH KHAN	GPS JAHANGIR KAKKI	Chowkidar	2	09-01-67	16-01-99	FA	25-06-89
9	RAHMAT ULLAH KHAN	GPS WALHI MAMAKHEL	Chowkidar	2	23-03-77	19-07-99	FA	16-01-96
10	FARMANULLAH KHAN	GPS MAZANGA LANDIDAK	Chowkidar	2	01-12-71	01-12-93	FA	10-08-00
11	Aisar Ali Shah	GHS No.1 Bannu	Lab Attendent	2	15-08-77	18-10-00	FA	1997
12	MUHAMMAD LIAZ	MUHAMMAD AYAZ	N/Qasid	2	10-01-80	02-05-01	FA	2000
13	Ghulam Mustafa Khan	GMS Muhammad Khan Kakki Bannu	Sweeper	2	03-04-81	18-10-00	FA	19-12-03
14	Rifat Ullah Khan	GHS Khujari Babar Bannu	N/Qasid	2	10-02-78	01-10-96	FA	30-03-05
15	FALAK-NAZ	GHS NO.3 BANNU	LAB ATTENDENT	2	04-01-84	01-01-06	FA	28-01-04
16	Shahud Ali Shah	GPS PIR SABER SHAH	CHOWKIDAR	2	10-08-85	23-02-06	FA	2005
17	fatih Ullah Khan	GHS Gul Zaman Ghoriwala	Sweeper	2	02-05-83	09-01-06	FA	05-08-06
18	WAHIDULLAH SHAH	GPS GUL SHAHDARAZ KAKKI	Chowkidar	2	08-04-84	01-09-06	FA	12-03-05
19	ZAFIRULLAH KHAN	GPS NEKUM KAKKI	Chowkidar	2	07-06-71	21-12-06	FA	13-08-00
20	MURAD ALI KHAN	GPS LEWAN DARDARIZ	Chowkidar	2	14-04-90	07-08-07	FA	26-06-06
21	Zalren Khan	GPS Bazida yousaf khan	Chowkidar	2	20-04-88	06-03-08	FA	19-02-07
22	MEHRULLAH KHAN	GPS AMIRDAD KHAWAJAMAD LANDIDAK	Chowkidar	2	05-05-78	10-01-07	FA	10-03-08
23	HAFIZ HAMID ULLAH	GPS BAYAZ KHAN DARDARIZ	Chowkidar	2	12-03-88	29-08-09	FA	2005
24	Hamid Ullah	GPS Nawazb Khan Mamash Khel	Chowkidar	2	12-01-78	09-05-96	FA	27-12-08
25	Muhammad Ibrahim	GHS Bilawar Khan Bannu	Sweeper	2	14-02-79	10-11-09	FA	30-03-05
26	ATTA ULLAH KHAN	GHSS NURAR BANNU	NAIB QASID	2	01-08-83	17-12-09	FA	21-11-01
27	Sajjad Ali Shah	GPS Ghani Machan Khel	CHOWKIDAR	2	02-12-92	01-07-10	FA	20-03-01
28	SARTAJ ALI KHAN	GPS ASLAM KHAN DARDARIZ	Chowkidar	2	03-12-84	19-01-10	FA	21-03-10
29	SHAHID KHAN	GPS WALI AYAZ MAD MIR KAKKI	Chowkidar	2	09-01-88	15-04-07	FA	07-03-11
30	Kashif Khan	GPS Fazal haq malwana	Chowkidar	2	06-10-91	11-06-11	FA	21-07-10
31	Safi Ullah	GMS Hassan Khel Khareki Bannu	W/O	2	08-02-79	12-06-11	FA	13-11-07
32	TAHIR ULLAH	GPS KOT PUSHA	Chowkidar	2				

	Saad Ullah Khan	GPS Saleh Khan Mandew	Chowkidar	2	02-03-74	01-07-11	FA	2010
	BDUR RAUF KHAN	GHSS NURAR BANNU	NAIB QASID	2	05-02-70	31-08-06	FA	28-12-11
35	Nazar Rehman	GPS Sadal madak shah	Chowkidar	2	02-01-76	10-01-12	FA	1994
36	ANWAR ULLAH KHAN	GPS MIR SHAHJAHAN MAMAKHEL	Chowkidar	2	01-04-82	14-02-12	FA	26-07-09
37	Muhammad Riaz Khan	GHS Sikandar Bharat Bannu	Chowkidar	2	01-05-86	13-07-12	FA	2004
38	MUJAHID KHAN	GPS NAR MANI KHAN	N/O	2	27-02-74	05-03-00	FA	21-07-12
39	ISRAR KHAN	GPS TOOR KHAN MAMA KHEL	Chowkidar	2	22-05-85	10-09-12	FA	29-01-08
40	Nazer Rahman	GPS Sadal madak shah	Chowkidar	2	01-02-76	01-10-12	FA	20-08-93
41	Sarhad Ullah	GHSS Hakim Haved Bannu	N/Oasid	2	15-03-90	09-10-12	FA	26-07-09
42	Muhammad Usman	GHS No.2 Bannu	N/Oasid	2	10-03-92	01-05-10	FA	05-12-12
43	NAJEEB ULLAH KHAN	GPS HAIBAT KHAN MANDAN	CHOWKIDAR	2	15/09/1987	07-12-12	FA	08-10-08
44	Rafidullah Shah	GHS No. 2 Bannu	Lab Attendant	2	28-04-92	20-02-13	FA	2010
45	Amjad Ali Shah	GMS No.2 Bannu	Sweeper	2	07-05-93	01-03-13	FA	28-10-11
46	JAVED ZAMAN	GPS AMIR KHAN BHARAT	Chowkidar	2	23-09-87	05-11-09	FA	04-08-13
47	NASRALI KHAN	GPS HAYAT KAKKI	Chowkidar	2	16-02-69	14-12-87	FA	06-08-13
48	MUNIR SHAH	GPS KOTKA AMBER SHAH	CHOWKIDAR	2	08-08-89	25-10-13	FA	26-07-09
49	SUFIAN KHAN	GPS MIR KAEDOT KHOJARY	Chowkidar	2	04-08-95	25-10-13	FA	1990
50	ARIF ULLAH KHAN	GPS ALAM MACHIN KHEL	Chowkidar	2	08-02-93	28-10-13	FA	23-07-01
51	MUHAMMAD FAYAZ	GPS SHEIKH MAHMOOD KAKKI	Chowkidar	2	26-02-87	26-11-13	FA	02-02-06
52	Asif Khan	GHS No.2 Bannu	Bearer	2	14-03-87	24-10-10	FA	01-12-13
53	SAAD ULLAH KHAN	GHS NO-1 BANNU	CHOWKIDAR	2	18-04-88	14-03-07	FA	01-12-13
54	Mohammad Javid	GPS Wanda Ghafar	Chowkidar	2	04-02-84	26-04-14	FA	17-10-96
55	Salah Ud Din	GPS Garera Shah Jahan	Chowkidar	2	19-04-84	02-05-14	FA	2002
56	ASHRAFULLAH	GHS BAHADAR MANAK KHEL	L/Att	2	20-03-96	02-07-10	FA	26-07-14
57	ALLAH NOOR KHAN	GPS PIR KHEL KAKKI NO.1	Chowkidar	2	14-03-78	25-11-14	FA	14-03-97
58	Taj-Murad-Khan	DEO Male Bannu	N/O / W/C	4	13-03-79	22-04-98	FA	05-08-15
59	Zahid Rahman	GPS Sokari Jabbar No.1	CHOWKIDAR	2	05-03-90	12-02-11	FA	05-08-15
60	Rasool Khan	DEO Male Bannu	Daffar	4	1994	14-10-13	FA	06-10-15
61	ZAI UR REHMAN	GPS NAR NAJEEB	Chowkidar	2	25-04-80	21-11-15	FA	1999
62	KHALID KHAN	GPS EABI KHAN DARDARIZ	Chowkidar	2	20-10-83	21-11-15	FA	30-07-13
63	Hizb Ullah	GPS Khan Zaman Nurar	Chowkidar	2	01-10-92	21-11-15	FA	2013
64	FARID ULLAH	GHSS PAINDA KHEL BANNU	LAB ATTENDENT	2	14-08-94	21-11-15	FA	2014
65	ASHRAF ULLAH KHAN	GPS DIL NWARZ BHARAT	Chowkidar	2	14-06-84	22-11-15	FA	10-08-07
66	Izaz Rahman	GPS Amir Muhtiar Ialozai	Chowkidar	2	15-04-95	07-01-16	FA	23-07-13

	GPS Ali mat khalakan	CHOWKIDAR	2	09-12-89	20-02-16	FA	08-10-07
	NASIR ULLAH KHAN	GPS BAKERAY BHARAT	2	13-03-89	24-02-16	FA	18-10-07
70	Qaiser Ali khan	GPS BULAND BAISTKHEL	2	02-03-79	25-02-16	FA	22-03-00
71	Rakif ullah	GPS Koli sadat No 2	2	29-03-95	25-02-16	FA	08-12-14
72	Rifat Ullah Khan	GPS Seru Bada Khel	2	30-08-92	27-02-16	FA	08-10-07
73	Siraj Khan	GPS Farq Ismail Khani	2	20-04-76	05-03-16	FA	26-05-96
74	Aurangzeb Khan	GMS Jahangi Lalozai Bannu	2	15-05-90	10-03-16	FA	09-09-13
75	Sanallah Khan	GMS Muhammad Khan, Kakki Bannu	2	07-04-91	30-05-16	FA	26-07-09
76	MUJEEB REHMAN	GPS ZEBA KHEL KHOJARY NO.1	2	12-05-93	04-06-16	FA	2012
77	Shah Riaz Khan	GPS Rushan Dad Kachkot	2	04-10-94	04-06-16	FA	06-08-13
78	Wahidullah	GPS Degan shsh jalal	2	15-04-86	06-10-16	FA	2014
79	Nematullah shah	GPS Koli sadat No 1	2	01-03-84	31-10-16	FA	26-06-05
80	GHWSULLAH JAN	GPS RAQIB BHARAT	2	25-10-90	31-10-16	FA	16-04-12
81	MUHAMMAD IBRAR KHAN	GPS HASSAN KHEL KHAIRAKI	2	05-10-89	16-02-17	FA	12-01-10
82	Noor Afzal khan	GPS Pak ismail khel	2	15-08-91	25-05-17	FA	11-05-11
83	Safid khan	GPS Mosa khel baram	2	25-03-92	06-04-17	FA	07-06-17
84	IMDAD ULLAH KHAN	GPS NAR SHERMAST	2	05-03-91	25-10-13	FA	11-07-17
85	ALAM ZEB KHAN	GPS NAWAB KHAN DARDARIZ	2	02-01-91	08-08-17	FA	14-12-11
86	Taza Khan	GHS Bizan Khel Bannu	2	25-03-96	08-08-17	FA	04-08-17
87	IZAZ-ULLAH KHAN	GPS MASTER LEWAN DRADARIZ	2	06-12-87	03-01-11	FA	20-12-17
88	Rahman Ullah Khan	GPS Babar Issaki	2	04-05-88	22-12-17	FA	27-05-09
89	Muhammad Ibrahim	GHSS Hakim Haved Bannu	2	10-03-85	28-12-17	FA	12-08-05
90	ZIA UL ISLAM	GPS KHUJARY.KHASS	2	30-03-90	28-12-17	FA	26-07-09
91	Shanfullah	GHS Ismaili Mama Khel Bannu	2	15-05-97	28-12-17	FA	22-12-17
92	UMER SARFARAZ KHAN	GPS FAIZ TALAB ABBAS NO 1	2	25-01-87	11-10-07	FA	01-01-18
93	Kashif Khan	GPS Jameel Khan Nurar	2	06-07-77	12-07-12	FA	13-07-16
94	Amir Ullah Khan	GHS No.2 Bannu	2	02-04-92	28-12-17	FA	02-08-18
95	IHSAN ULLAH	GPS NO 2 GHORIWALA	2	10-04-92	18-01-19	FA	01-01-18
96	MUHAMMAD BILAL	GPS GUL BAZ KHAN MANDAN	2	15-03-84	04-03-01	FA	19-02-19
97	WEQAR KHAN	GPS LAR KILLA SELANI	2	30/03/1995	14-10-17	FA	30-07-19
98	Ikrmullah	GPS Falmakhel	2	02-04-99	22-02-17	FA	30-07-19
99	Abdullah khan	GPS NO 2 BANNU	2	27-03-87	21-11-15	FA	10-09-19
00	Abed Ullah Khan	GHS Ganji Daud Shah Bannu	2	06-01-86	09-02-19	FA	23-09-19
01	Abid Ullah Khan	GHS Kinger Jan Bahader Bannu	2	20-01-75	08-07-18	FA	1995
		CHOWKIDAR	2	14-03-98	22-07-19	DAE	2313

LAB ATT

FA

102	Sharif Ullah Khan	GHS Ismaili Mama Khel Bannu	Sweeper	2	14-07-87	01-04-08	FA	2018
103	Allab Ali Khan	GHS-Sham Shai Khel Bannu	N/Qasid	2	07-04-95	05-06-16	FA	2018
104	Nafid Ullah Khan	GHS Sham Shai Khel Bannu	Lab Attend	2	12-12-83	15-11-06	FA	2016
105	HAMEED KHAN	GPS NAWAB KHAN MAMASH KHEL	CHOWKIDAR	2	12-03-88	30-08-09	FA	2016
106	SHAH FAISAL	GPS CHE GARHI MAMASH KHEL	CHOWKIDAR	2	15-02-92	25-10-13	FA	2016
107	REHMAN ULLAH KHAN	GHSS DILASA KHAN MANDEW BANNU	CHOWKIDAR	2	07-06-95	02-09-14	FA	2016
108	IBRAR KHAN	GHS KHAN ZAMAN NURAR BANNU	SWEEPER	2	01-02-86	01-01-09	FA	2015
109	Zahid Ullah Khan	GMS Sakhi Sarwar Mandew Bannu	N/Qasid	2	27-04-89	06-12-09	FA	2015
110	MUHAMMAD AFAQ KHAN	GPS AMANDI SHEIKH AMIR	CHOWKIDAR	2	30-03-97	25-02-16	FA	2015
111	Abid Rahman	GPS Hindi Khel Bannu	N/Qasid	2	10-01-81	27-03-17	FA	2015
112	Syed Noor Jahan Shah	GMS Shahdew Bannu	N/Qasid	2	05-02-95	14-10-17	FA	2015
113	SULAIMAN KHAN	GHS KAKKI BANNU	CHOWKIDAR	2	25-03-95	14-10-17	DAE	2014
114	SUFYAN SAMEEN	GHS MANDAN BANNU	NAIB QASID	2	25-01-94	22-11-13	FA	2013
115	NASIR KHAN	GHS KAKKI BANNU	NAIB QASID	2	20-03-95	05-06-15	FA	2013
116	Nasir Khan	GMS Asad Khujari Bannu	N/Qasid	2	05-05-94	04-06-16	DAE	2013
117	WAQAS Khan	GHS S.K.Bala Bannu	CHOWKIDAR	2	29-03-96	25-05-17	FA	2013
118	Zakir Ullah Khan	GHSS Lalozi Bannu	Lab Attendent	2	04-05-94	23-01-14	FA	2012
119	FARHAD KHAN	GHS KAKKI BANNU	CHOWKIDAR	2	13-04-84	03-10-06	FA	2011
120	Umar Ayaz Khan	GPS Sakhi Sarwar Mandew	Chowkidar	2	20-11-77	21-06-07	FA	2011
121	Hadayat Ullah	GHS Mira Khel Bannu	CHOWKIDAR	2	28-02-92	04-06-16	FA	2011
122	Adnan Khan	GMS Bazida Yousif Khan Bannu	CHOWKIDAR	2	07-09-88	04-02-2016	FA	2010
123	AURANG ZEB KHAN	GMS JAHANGIR LALOZAI BANNU	SWEEPER	2	07-04-91	30-05-16	FA	2009
124	Muhammad Ismail Khan	GHS Bazar Ahmad Khan Bannu	Sweeper	2	07-05-87	13-03-15	FA	2007
125	Attaullah Khan	GHSS NURAR BANNU	N/Qasid	2	14-02-79	11-11-09	FA	2005
126	Waheed Ullah Khan	GHSS Mamash Khel Bannu	CHOWKIDAR	2	07-11-84	15-06-05	FA	2004
127	Shadman Khan	GHS Sero Bada Khel Bannu	N/Qasid	2	01-11-78	19-01-12	FA	2004
128	HAMEED ULLAH KHAN	GHS KAKKI - BANNU	WATER CARRIER	2	01-04-78	24-01-14	FA	2001
129	Iftikhar Khan	GMS Jhando Khel Bannu	Sweeper	2	01-01-82	12-09-05	FA	2016
130	Irfan Ullah Khan	GMS Bazida Yousif Khan Bannu	N/Qasid	2	01-11-85	?	D.cm	2003
131	Hadayat Ullah	GHS Ismaili Mama Khel Bannu	Lab Attendent	2	02-05-93	22-11-15	FA	2015
132	Imranullah Khan	GHSS Mamash Khel Bannu	Lab Attendent	2	?	?	BA	?
133	Asghar Ali Khan	GHS Nar Jaffar Bannu	N/Qasid	2	?	?	FA	?
134	Zahoor Anwar	GMS Asad Khujari Bannu	N/Qasid	2	?	?	BA/DIT	?
135	Muhammad Saad	GPS Pir Fida Jhando Khel Bannu	Lab Attand	2	?	?	BA	?
136	MOHIB ULLAH KHAN	GHSS Shahbaz Azmat Khel Bannu	Lab Attand	2	?	?	FA	?

138	ZIA ULLAH	GPS SHUKURULLAH BERI KHEL	CHOWKIDAR	2	01-01-72	16-09-05	?	?
139	Muhammad Younas Khan	GPS GULAN KILLA	CHOWKIDAR	2	08-04-84	09-03-06	FA	?
140	FIDA UR REHMAN	GPS No.2 SHAHBAZ AZMAT KHEL	CHOWKIDAR	2	02-03-73	09-03-06	?	?
141	Shah Riaz	GPS AMANDI SHAH JAHAN	CHOWKIDAR	2	06-09-82	09-09-06	?	?
142	ZAFAR IQBAL	GPS KOTKA JUMA KHAN	CHOWKIDAR	2	22-02-81	05-10-06	?	?
143	IHSAN ULLAH KHAN	GPS MIR HASSAN	CHOWKIDAR	2	01-10-68	14-10-06	?	?
144	Sharafat Khan	GPS NUSRAT SHAL KHEL	CHOWKIDAR	2	01-01-62	11-11-06	?	?
145	ABDUL JABBAR	GPS NO.1 BAZAR AHMAD KHAN	CHOWKIDAR	2		16-12-06		?
146	KHAIR ULLAH	GHSS JANI KHEL MALI KHEL BANNU	CHOWKIDAR	2				?
147	MUHAMMAD NISAR KHAN	GPS LANDI KILLA	CHOWKIDAR	2	05-04-83	08-01-07	?	?
148	ASHRAF KHAN	GPS MAMABATI BARAKZAI	CHOWKIDAR	2	18-12-71	03-09-07	?	?
149	ANAR JAN	GPS GATI KILLA BARAKZAI	CHOWKIDAR	2	01-07-80	22-09-07	?	?
150	BAKHT NAWAZ KHAN	GPS UMAR GULA WALIGAI	CHOWKIDAR	2	02-12-75	06-10-07	?	?
151	ARSHAD	GPS ZONDA GHAIBI	CHOWKIDAR	2	01-07-74	24-10-07	?	?
152	RAB NAWAZ	GPS KARAB KILLA	CHOWKIDAR	2	07-04-88	08-01-08	FA	?
153	ZAHID ULLAH	GPS GULA NOOR BARAKZAI	CHOWKIDAR	2	?	23-03-08	?	?
154	Hidayat Ullah Khan	GPS KOTKA AZAD KHAN	CHOWKIDAR	2	05-02-81	12-05-08	FA	?
155	AZIZ ULLAH KHAN	GPS Muhammad Khan Gambar	CHOWKIDAR	2	14-01-71	07-06-08	?	?
156	Shah Tamas Khan	GPS UMER GUL PATOL KHEL	CHOWKIDAR	2	10-01-82	15-08-08	?	?
157	Mishqal Ullah	GPS Haji Daraz Khan	Chowkidar	2	25-03-90	04-01-09	FA	?
158	ABDUL SAMAD	GPS EMAL KHEL ESAKI	CHOWKIDAR	2	01-01-83	01-03-09	?	?
159	ABDUL AZIZ	GPS WALIZAR KILLA	CHOWKIDAR	2	15-01-88	14-03-09	?	?
160	UMAR RIAZ	GPS MIR ALAM CHASHMAI	CHOWKIDAR	2	01-01-91	13-07-09	?	?
161	MUHAMMAD IBRAHIM SHAH	GPS YAQOOB KHAN DHANDI	CHOWKIDAR	2	12-09-72	14-01-10	?	?
162	Rahman Gul	GPS ZAHIR SHAH AKHUNDAN	CHOWKIDAR	2	02-05-85	23-06-10	?	?
163	NISAR KHAN	GPS No.1 SHAHBAZ AZMAT KHEL	CHOWKIDAR	2	01-01-70	23-06-10	?	?
164	MOIN ULLAH	GPS WAZIRULLAH	CHOWKIDAR	2	10-01-83	01-07-10	?	?
165	Alla ur Rehman	GPS MOINULLAH LANDI JALANDER	CHOWKIDAR	2	01-01-72	24-12-10	?	?
166	Mehmood Khan	GPS SOKARI KARIM KHAN	CHOWKIDAR	2	01-07-81	11-01-11	?	?
167	RAHIM ULLAH	GPS HASSAN KHEL ISAKI	CHOWKIDAR	2	01-06-70	02-02-11	?	?
168	Habib Nawaz Khan	GPS KOTKA BILAWAR KHAN	CHOWKIDAR	2	03-02-80	08-02-11	?	?
169	Shadman Nawaz	GHSS Comp: Bannu	Chowkidar	2	25-08-89	01-03-11	FA	?
170	IHSAN ULLAH	GHSS Comp: Bannu	Mafi	2	02-03-93	01-06-11	FA	?
170	SAFI ULLAH	GPS SALIM KHAN GADI TOP	CHOWKIDAR	2	01-07-86	11-06-11	?	?

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	Arqan Khan	GMS HASSAN KHEL KHERAKI	NAIB QASID	2	06-10-91	11-06-11	FA	?
	ZARBAT KHAN	GMS No.1 Bannu City	N/Q	2	12-01-11	23-07-11	FA	?
173	Muhammid Gul	GPS TAZA KHAN	CHOWKIDAR	2	01-01-77	17-10-11	?	?
174	Javed Khan	GPS NO 7 BANNU	CHOWKIDAR	2	01-01-86	22-11-11	?	?
175	Wasim Daraz	GPS AZMAT KALA	CHOWKIDAR	2	20-05-80	01-01-12	?	?
176	MUHAMMAD SHOIB	GPS NO 9 BANNU	CHOWKIDAR	2	10-01-92	10-01-12	?	?
177	Abdul Hubaib	GPS ALIM SHAH	CHOWKIDAR	2	22-03-94	09-02-12	?	?
178	Keimran Khan	GHSS Jani Khel Bannu	L/AII	3	?	23-04-12	?	?
179	UMAR GUL KHAN	GPS NO 3 BANNU	CHOWKIDAR	2	01-07-80	13-07-12	?	?
180	AZIM KHAN	GPS FURANA DAUD SHAH	CHOWKIDAR	2	?	08-10-12	?	?
181	Ghayur Khan	GPS CHODI KHEL DABAK	CHOWKIDAR	2	10-10-75	09-10-12	FA	?
182	ABDUL SHAKOOR	GPS KARIM KHAN BAIST KHEL	CHOWKIDAR	2	01-02-90	10-10-12	?	?
183	AMIN ULLAH	GPS EACHAKI JANI KHEL	CHOWKIDAR	2	10-08-84	25-10-13	FA	?
184	Asif Khan	GPS SAID NAWAZ TARKHOBA	CHOWKIDAR	2	27-04-87	25-10-13	?	?
185	RASHID ULLAH	GPS CHAREEB ABAD	CHOWKIDAR	2	15-09-95	25-10-13	?	?
186	ANWAR JAMAL KHAN	GPS RUSRAT DAUD SHAH	CHOWKIDAR	2	1984	25-10-13	?	?
187	NEK MAAN ULLAH	GHS AJMAL BARLASHTI DAUD SHAH BANNU	?	2	20-08-89	25-10-13	FA	?
188	FARMAN ULLAH	GPS CHANDI WAZIR	CHOWKIDAR	2	22-03-84	26-10-13	FA	?
189	MURTAZA KHAN	GPS GUL PAYO	CHOWKIDAR	2	07-04-92	29-10-13	FA	?
190	Shah Zeb Nawaz	GPS EHADEER ZAMAN SARDI KHEL	CHOWKIDAR	2	12-03-89	25-11-13	FA	?
191	SHAHZEB NAWAZ	GHSS Comp. Bannu	Chowkidar	2	04-09-95	01-01-14	FA	?
192	MUDASIR NOOR	GHSS (COMP.) NAZIM NASIB NAWAZ ISSAKI SHA	CHOWKIDAR	2	04-09-95	01-01-14	FA	?
193	NAZIF ULLAH	GPS WAZIR ABAD MARGHALI	CHOWKIDAR	2	02-03-89	24-01-14	?	?
194	RAFI ULLAH	GPS HSAN ULLAH BAIK KHEL	CHOWKIDAR	2	09-01-85	27-05-14	FA	?
195	NAHEED ULLAH	GPS ALAM DIN	CHOWKIDAR	2	12-12-94	27-05-14	?	?
196	Shamroz Khan	GPS KAMAR KILLA	CHOWKIDAR	2	22-04-87	11-08-14	?	?
197	Zohaib Khan	GPS LAGARAY KALA	CHOWKIDAR	2	1984	18-08-14	?	?
198	UMER SHAH	GPS No.5 SHAHBAZ AZMAT KHEL	CHOWKIDAR	2	02-02-94	23-08-14	?	?
199	Sajid Ali Shah	GPS WEDAN KILLA	CHOWKIDAR	2	01-06-89	01-09-14	?	?
200	ABDUL HAMID KHAN	GPS MASTER ESAKI	CHOWKIDAR	2	04-05-96	13-09-14	?	?
201	IRFAN ULLAH	GPS MUHAMMAD KHALIL MANDAN	CHOWKIDAR	2	15/11/1975	09-10-14	FA	?
202	MUHAMMAD FARMAN	GPS ROTKA SHANAWAZ	CHOWKIDAR	2	22-06-79	29-11-14	FA	?
203	ZIA UR REHMAN	GPS GUL IMAM	CHOWKIDAR	2	05-03-74	03-12-14	FA	?
204	FIDA ULLAH	GPS SAIDULLAH KHAN WALI NOOR JANI KHEL	CHOWKIDAR	2	02-01-91	12-03-15	FA	?
205	TAHIR ULLAH	GPS MIRDARAZ SARKI KHEL	CHOWKIDAR	2	01-03-96	12-03-15	?	?

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W

	IMRAN KHAN	GPS-AQLIM KHAN KILLA	CHOWKIDAR	2	05-09-92	15-02-17	FA	?
	ASLAM FARID KHAN	GPS GUL JAWAR	CHOWKIDAR	2	15-02-86	15-02-17	?	?
			Naib Qasid	2	20-02-82	28-02-17	FA	?
225	ZEESHAN	SDEO MALE DOMEL	CHOWKIDAR	2	26-03-96	17-05-17	?	?
226	SOHAIL KHAN	GPS DOGAR UMERZAI	CHOWKIDAR	2	01-01-99	17-05-17	?	?
227	Shahid Khan	GPS LADHA KHEL DAUD SHAH	Chowkidar	2	20-11-97	25-05-17	FA	?
228	Riaz khan	GPS Wafi Zaman Nurar	CHOWKIDAR	2	01-01-89	25-05-17	?	?
229	MUHAMMAD ASIF	GPS KALA KHEL MASTI KHAN	CHOWKIDAR	2	29-03-90	13-07-17	?	?
230	Haleem Rehman	GPS_SHER GHULAM SHERI KHEL	CHOWKIDAR	2	12-01-76	27-07-17	?	?
231	GUL WALI KHAN	GPS AYUB REHMAN	CHOWKIDAR	2	01-01-82	08-08-17	?	?
232	MEHRAN KHAN	GPS LAKKI QAMAR DIN	CHOWKIDAR	2	07-12-86	22-12-17	FA	?
233	Haroon Shehzad	GPS MAMASH KHEL KHAS	CHOWKIDAR	2	01-04-96	22-12-17	?	?
234	Muhammad Yasin khan	GPS NO 1 BANNU	CHOWKIDAR	2	04-08-99	22-12-17	?	?
235	SAMIMULLAH KHAN	GPS No.4 SHAHBAZ AZMAT KHEL	Chowkidar	2	01-07-90	23-12-17	FA	?
236	WALIYAZ	GPS BAIND KHEL KAKKI	CHOWKIDAR	2	02-08-01	22-07-19	?	?
237	M. RIAZ KHAN	GPS GADI TOP	CHOWKIDAR	2	13-07-12	?	FA	R.A.Date
238	Muhammad Masood	GHS SIKANDER BHARAT BANNU	NAIB QASID	2	15-03-74	01-02-11	DAE	
239	ADNAN KHAN	GHSS Shabaz Azmat Khel Bannu	Lab Attendent	2	10-07-83	27-03-04	FA	?
240	KHALID REHMAN	GPS MUSA KHEL VOLIGAI	CHOWKIDAR	2			FA	?

District Education Officer
(Male) Bannu

17

Qu

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OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) BANNU.
PROMOTION ADJUSTMENT ORDER.

Consequent upon the recommendation by the DPC/DSC Committee Education Department Bannu, the following Class-IV Govt. Servants Education Department District Bannu, are hereby promoted and adjusted against vacant J/Clerk post, w.e.f the date of taking over charge in the interest of public service, out of 40% promotion quota on the basis of seniority cum-fitness in light of Govt. policy dated 18 July, 2019 on merit basis as per the terms & conditions given below.

S. No	Name & Designation	Place of posting	Adjusted as J/Clerk	Remarks
1.	Taj Murad NO/WC FA	DEO (M) Office Bannu.	GHS Murib khel Bake Khel Bannu.	Adjusted against J/Clerk vacant post.
2.	Hamid Ullah Chowkidar BA/DIT	GPS Nawab Khan Mamash Khel Bannu.	GHSS Al-Hamid wati Noor jani Khel Bannu.	Adjusted against J/Clerk vacant post.

TERMS & CONDITIONS.

1. Their regular basis promotion is issued as per the approval of DPC/DSC on the basis of seniority cum fitness.
2. They will be on probation for a period of one year extendable for another one year.
3. They will be reverted at any time without assigning any reason or notice to their original post if their efficiency is found unsatisfactory.
4. They are directed to join their new assignment within 15 days otherwise it will be presumed that they have xxx their promotion.
5. Their inter seniority on lower post will intact as usual.
6. Charge report should be submitted to all concerned.
7. No TA/DA is allowed.

Sd/-
(ATAULLAH KHAN MINAKHEL)
DISTRICT EDUCATION OFFICER,
(MALE BANNU).

Endst: No. 3371-80/post Class-IV staff Dated Bannu the 14-03-2020.

Copy for information and necessary action to the:

1. Director of Elementary & Secondary Education Department, NWFP.
2. Deputy DEO (M) Bannu.
3. SDEO (M) Bannu.
4. District Accounts Officer, Bannu.
5. Principal / Head Master Concerned School.
6. Official concerned for strict compliance and report.

Sd/-
District Education Officer,
Male, Bannu

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) BANNU

PROMOTION/ADJUSTMENT ORDER

Consequent upon the recommendation by the DP/NSC Committee Education Deptt. Bannu, the following Class-IV Govt. Servants Education Department District Bannu, are hereby promoted and adjusted against vacant d/c/tekr post, w.e.f. the date of taking over charge in the interest of public service, out of 40% promotion quota on the basis of seniority cum fitness in the Govt. public dated 18 July 2019 amongst bars as per the terms & Conditions given below.

S/N	NAME	Place of Posting	Adjusted as d/tekr	REMARKS
1	TEJANAND FA	DISTRICT OFFICE Bannu, CLASS FOUR KHAI KHAI	vacant post	Adjusted against d/tekr
2	HANJALAH FA	GIS NAVAB KHAN MUNSHI KHAI KHAN	vacant post	Adjusted against d/tekr

TERMS & CONDITIONS:

- The order promotion is issued as per the approval of DP/NSC on the basis of seniority cum fitness.
- They will be on probation for a period of one year, extendable for another one year.
- They will be reverted at any time without assigning any reason of notice to their original post.
- Their efficiency is found satisfactory.
- They are directed to join their new assignment within 15 days otherwise it will be premature.
- They have to leave their probation.
- They have to accept the lower post with effect as usual.
- These request should be submitted to all concerned.
- No pay is allowed.

ATTAULAH KHAN AINIA KHEDI
DISTRICT EDUCATION OFFICER,
(MALE) BANNU

Under NO 3371-80 from Chief Education Officer Bannu the 14/03-2020
(Copy for information and necessary action to the

- Director of Elementary & Secondary Education Department NWFC
- Deputy District Officer Bannu
- Deputy District Officer Bannu
- District Accounts Officer Bannu
- Principal Head Master Government School
- Official concerned for strict compliance & report

DISTRICT EDUCATION OFFICER
(MALE) BANNU

E 18

محمد صاحب ڈاکٹر صاحب ایڈمنسٹری اڈنگ سپلانڈری انجینئر خیر خواجہ

عنوان :- درخواست برائے ڈسٹنگلی سٹارٹ اپ لینا (کلاس فورڈا زمین) ڈسٹریکٹ بینوں

نوٹ: ضروری ڈاکیمنٹس درخواست کے ساتھ مل کر ہیں۔

سنزورشن کے لیے سال 2006 سے 15 HSS حسن خیل میں چھوڑا گیا

کیونکہ برائے زمین ہے جیسا کہ آئیے نوٹ ہے کہ ایجوکیشن کے لیے

ڈسٹریکٹ سٹارٹ اپ لینا ڈسٹریکٹ سطح پر موجود ہیں جیسا کہ کلاس

فورڈا زمین بھی ہیں کہیں برقی سے ڈسٹریکٹ بینوں کے موجودہ کلاس

فورڈا زمین کے سٹارٹ اپ لینا میں ہیں ساری غلطیاں ہیں اور یہ غلطیاں

جان ایجوکیشن کے لیے ہیں۔ تاکہ اس کے ذریعے سے اپنے بندوں کی پرورش ہو سکے

اور اس کا ثبوت ہے کہ اس سٹارٹ اپ لینا میں سیرا سٹریٹل نمبر

126 پر درج ہے جیسا کہ سیرا سٹریٹل نمبر لینا کے قانون سے 14 نمبر پر

درج ہے لہذا ڈسٹریکٹ کی جائے گا۔ حقدار کو اپنا حق مل سکے

جہاں ڈاڈا ڈسٹریکٹ بینوں کے کلاس فورڈا زمین کی سٹارٹ اپ لینا

میں ہیں جہاں غلطیاں ہیں جیسا کہ غلط ہے وہ کلاس فورڈا زمین پر نوٹ

مقرر کیے جیسے F.A سے پہلے کی صورت اور یہاں 2007 میں کیا ہے جسکی

وجہ سے ہیں کہ اسے بنوں سے زیادہ سیرا سٹریٹل کی سٹریٹس ہوتی ہے

جیسا کہ حاج مراد اور عبداللہ خان قابل ڈسٹریکٹ حاج مراد F.A 5/15

عبداللہ (2016) میں پاس کیا ہے

لہذا استدعا ہے کہ یہاں غلط ہے جیسا کہ غلط ہے سیرا سٹریٹل

کا حق بننا ہے جو کہ میں ان دونوں سے سیرا سٹریٹل کے لہذا حق دیکھتا ہوں

میں کو اس کی صورت

آپ کا شکریہ وحید اللہ خان سیرا سٹریٹل غلط ہے
وحید اللہ صاحب خان داد خان فورڈ

خدمت صواب ڈائریکٹر مہاراجہ ایجنسی ایڈمنسٹریٹو ایڈیٹر پرنٹنگ و پبلشنگ
عنوان : درخواست برائے درستی سیٹ اپ لسٹ (ٹیکس ورکس) ڈائریکٹ
ڈائریکٹر ایڈمنسٹریٹو ڈیپارٹمنٹ درخواست نمبر ساٹھ لف ہے۔

صواب سال :
تعدادش ہے کہ سال 2015 سے HSS کے تحت عمل میں
جو نیا درجہ پوسٹ پر تعینات ہے۔ جیسا کہ آپ کو معلوم ہے کہ ایکویٹی کے
پرنٹنگ کے سیٹ اپ لسٹ ڈائریکٹ کی سطح پر موجود ہیں۔ جس میں ٹیکس ورکس
ملازمین ہیں لیکن برقی سے ڈائریکٹ جنوں کے موجودہ ٹیکس ورکس ملازمین
کے سیٹ اپ لسٹ میں بہت ساری غلطیاں ہیں۔ اور یہ غلطیاں جان بوجھ
کر کیے گئے ہیں تاکہ اسکے ذریعے سے اپنے بندوں کی پروموشن کر سکے۔
اور اسقاطیوں سے کہ اس سیٹ اپ لسٹ میں میرا میرا بل نمبر 126 پر درج
ہے۔ جیسا کہ میرا میرا بل نمبر 126 کے مطابق ہے۔ اور میرا میرا بل نمبر 126
درستی میں جائے تاکہ حقدار کو اپنا حق مل سکے۔

صواب والا ڈائریکٹر جنوں کے ٹیکس ورکس ملازمین کی سیٹ اپ میں بہت سی
یہ غلطیاں ہیں۔ جیسا کہ مطابق وہ ٹیکس ورکس ملازمین پر موٹ ہوئے
جسے FA سے بدلے کی ہو اور میں نے 2004 میں کی ہے۔ جیسا کہ
میں نے اپنے بندوں سے زیادہ سیکرٹوں میں پروموشن ہوئی ہے۔ جس سے
تاج مراد اور حفیظ اللہ خان قابل ذکر ہیں [تاج مراد A 2005 اور حفیظ (B 16)]
میں باقی لکھو۔ لہذا استدعا کرتا ہوں کہ جیسا کہ مطابق میرے پروموشن
کا حق بتائے کیونکہ میں ان دونوں سے سیکرٹوں میں۔ لہذا حق دیکر مشکور
فرمادیں۔

میں لائق شکر ہوں

ایمان بخش و صید اللہ خان جو نیا درجہ سکول چھڑا

20-4-2020

1101-7941352-5

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9 1 20
BEFORE THE PESHAWAR HIGH COURT BENCH BANNU

Writ Petition...../2020

1. Afsar Ali Shah S/O Qamar Ali Shah R/O Naseem Akbar Shah Essaki Shaikhan Bannu.
2. Wahid Ullah S/O Mir Jahandad R/O Noghari Mamash Khel Bannu.
3. Falak Naaz Khan S/O Qadar Khan R/O Mohalla Shadi Khan Kakki Taraf Awal Bannu.Petitioner

VERSUS

1. Government of KPK through Secretary Education Peshawar.
2. District Education Officer (Male) Bannu.
3. Taj Murad Khan junior clerk posted at GHSS Murib Khel Baka Khel Bannu.
4. Hamid Ullah Junior Clerk posted at GHSS Al-Hamid Wali Noor Jani Khel District Bannu.
5. Atta Ullah Mina Khel (Ex-DEO Education Bannu) Mohallah Mina Khel District Lakki Marwat.

..... Respondents

WRIT PETITION UNDER ARTICLE 199 OF THE
CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN 1973

Respectfully Sheweth,

1. That petitioners are class-IV employees of the respondent Department who are appointed on the post of Class-IV on 01/12/1993, 01/06/2005 and 27/08/1996 having high qualification and high quality service record. (Copy of the appointment order and service book are annexed as A)
2. That according to government policy for appointment of junior clerks 20% quota is reserved from class-IV employees of daftaris and where daftari are not available then common seniority list of Naib Qasid at etc will be appointed on the post of junior clerk with at least 3 year service.(Copy of the appointment policy is annexed as B)
3. That respondent department neglecting the policy of appointment of class-IV to junior clerk despite the fact that a large number post a junior clerk with the

Filed Today
08 JUN 2020
Additional Registrar

ATTESTED
Peshawar High Court
Bannu Bench

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21

respondents department and they promoted/appointed Class-IV employee without seniority list although, seniority list is mandatory for promotion/appointment and respondents No.1, 2 are under legal obligation to circulate seniority list in January and after receiving objection from the employees then they will finalize the seniority list and then they appointed/promoted employees. But respondent No.5 before four days the retirement from his service without seniority list/merit list issued illegal promotion/appointment of respondent No.3 & 4 who are most junior from the petitioners who are the nominee of local politician. (Copy of the promotion order is annexed as C)

4. That Petitioner submitted various applications for appointment and for preparation of seniority list for the post of junior clerk but till date no response is given so having no other efficacious remedy for relief the Petitioner invokes the extra ordinarily constitutional jurisdiction inter-alia on the following grounds.

GROUND:

1. That Petitioner is not treated according to law, rules and regulations.
2. That Petitioner is not treated according to article 4 and 25 of the constitution.
3. That petitioner has more then 27, 15 & 24 year service and has vested right for appointments on the post of junior clerk.
4. That promotion/appointment of the respondent No.3 & 4 is against law, rules, regulation and service rules, hence reversible.
5. Other grounds will be taken during arguments with the permission of the court.

It is therefore, humbly prayed that on acceptance of instant writ petition respondents may kindly be directed to

a) Declare the office order of respondent No.3 & 4 dated 14/03/2020 Endst No. 3371/80 is void ab-initio illegal against law rules and regulation arbitrary fanciful and colorful exercise of power without lawful authority and in effective upon the right of the petitioner and respondent No.5 may be proceeded under efficiency and discipline rules 2011.

b) To implement the 20% promotion/appointment quota on the post of junior clerk from Class-IV as per law rules and regulations of

ATTESTED

[Signature]
P. Chandra Prasad
Registrar

Filed Today
08 JULY 2020
[Signature]
Registrar

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22

the provincial government and appointed/promoted petitioner on the post of junior clerk.

- c) Direct the respondents to prepare joint seniority list of Class-IV employee and include the name of the petitioners.
- d) Any other relief with this honourable court may deem fit may also be granted.



Afsar Ali Shah & others Petitioner

Through Counsel

Masood Ur Rehman Wazir
Advocate High Court

INTERIM RELIEF

In wake of above submission appointment/promotion of the respondents No. 3 & 4 may kindly be suspended till the final disposal of instant writ petition.


Afsar Ali Shah & others Petitioner

Through Counsel

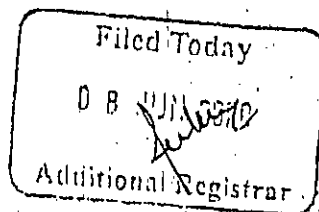
Masood Ur Rehman Wazir
Advocate High Court

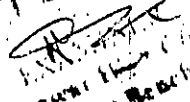
Certificate

It is certified that no writ petition is filed on the subject matter.

LAW BOOKS

Constitution of Pakistan 1973.
Case law per needs.



ATTESTED

Masood Ur Rehman Wazir
Advocate High Court

Note: writ falls in the domain of D.B

H/ 23

H/ 1-68 H/ 23 16-4-21

GOVERNMENT OF KHYBER PAKHTUNKHWA
ADMINISTRATION DEPARTMENT

No. E&AD/4(152)/2021/APCA
Dated: 16-04-2021


The Secretary to Government of Khyber Pakhtunkhwa,
Elementary & Secondary Education Department

Subject: APPLICATION FOR CLASS-IV PROMOTION AND THE CONDITION
OF TYPING TEST

Dear Sir,


I am directed to refer to the subject noted above and to state that as per advice of Regulation Wing, Establishment Department, no condition of typing test exists for the promotion of Class-IV employees. Therefore, instructions contained in the letter dated 26-11-2018 (copy enclosed) of Regulation Wing, Establishment Department may be followed in its letter and spirit while making promotion of Class-IV employees.

Yours faithfully,


SECTION OFFICER (ADMIN)
16/4

A copy is forwarded to the:

1. Section Officer (R-IV), Establishment Department
2. PS to Secretary (Admn), Administration Department
3. PS to Additional Secretary-I, Administration Department
4. PA to Deputy Secretary (Admn), Administration Department
5. Mr. Akbar Khan Mohmand, Provincial President APCA


SECTION OFFICER (ADMIN)
16/4

SOG
Dm
16/4/21

I 24

PESHAWAR HIGH COURT,
BANNU BENCH

FORM OF ORDER SHEET

Date of Order or proceedings	Order or other proceedings with signature of Judge(s).
(1)	(2)
20.04.2022	<p><u>W.P No.525-B of 2020</u></p> <p><u>Present:</u> Masoodur Rehman advocate for petitioner. Sardar Muhammad Asif Asstt: A.G for the official respondent ***</p> <p><u>SAHIBZADA ASADULLAH, J.---</u> The petitioners approached this court by invoking its jurisdiction under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973, with the prayer "<i>It is, therefore, humbly prayed that on acceptance of instant writ petition respondents may kindly be directed to:</i></p> <p>a) <i>Declare the office order of respondent No.3 & 4 dated 14.03.2020 Endst: No3371/80 as void ab-initio illegal against law rules and regulation arbitrary fanciful and colourful exercise of power without lawful authority and in effective upon the right of the petitioner and respondent No.5 may be proceeded under Efficiency and Discipline Rules 2011.</i></p> <p>b) <i>To implement the 20% promotion/ appointment quota on the post of junior clerk from Class-IV as per law rules and</i></p>

ATTESTED

[Signature]
BANNU BENCH

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regulations of the provincial government and appoint/ promote the petitioner on the post of junior clerk.

c) Direct the respondents to prepare joint seniority list of Class-IV employee and include the name of the petitioner.

d) Any other relief with this hon'ble court may deem fit may also be granted."

2. In the comments respondents have submitted that the petitioners were duly considered for promotion, however, having failed in the typing test have become ineligible.

3. In view whereof, we find that petitioners have already been considered and have become ineligible, so their grievance, if any, can be agitated before the Service Tribunal, as bar contained under Article 212 of the Constitution of Islamic Republic of Pakistan, 1973, hit the case of petitioners. In such eventuality, this petition is dismissed, however, the petitioners are at liberty to approach the Service Tribunal in accordance with law,

Announced:
Di: 20.04.2022
Azam/P.S

(D.B)
Hon'ble Mr. Justice Ijaz Anwar and
Hon'ble Mr. Justice Salihzada Asadullah

CERTIFIED TO BE TRUE COPY

23 APR 2022
1 check

Peshawar High Court
Authorised Under Article 177 of
The Qanun-e-Shahadat Ordinance 1984

25/4/2022

بیت الخلافت جناب سرسبز ٹیبلٹ صوبہ پشاور

مستجاب ایڈیٹ

وحدیہ نام

دعویٰ

باسمہ تعالیٰ

© ————— ©

مستجاب سندھ جو عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ ان مقام پشاور کیسے استعمال اٹکس خان سرور سے ایڈوکیٹ، ہائی کورٹ کو وکیل مقرر کر کے اٹار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کابل اختیار ہوگا نیز وکیل صاحب کو کرنے دہنی نامہ و آفیشز، واپسہہ برصاف لینے جواب دہی اور قابل دعویٰ اور لہذا ہوتا ڈگری کرنے اجراء اور دعویٰ جیک در پیہ اور رضی دعویٰ اور درخواست ہر قسم کی تقدیراتی اور اس پر کھنڈ کرنے کا اختیار ہوگا نیز بصورت عدم پیروی یا ڈگری بیک طرفہ یا اپیل کی برکوری اور ترمیمی نیز دائر کرنے اپیل ٹکرائی و نظر ثانی و پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ منکرہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مٹار قانونی کو اپنے ہمراہ یا اپنی بجائے تفرک کا اختیار ہوگا اور جو مقدمہ کو نہیں وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا مساختہ پروا خست منظور قبول ہوگا و دوران مقدمہ میں جو خرچہ و تر جانہ التوا مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب موصوف ہوں گے نیز بقایا و خرچہ کی وصولی کرنے کا بھی اختیار ہوگا اگر کوئی تاسخ پیشی مستقیم درودہ پر ہو یا حد سے باہر ہو تو وکیل صاحب یا ہمارے ہوں گے کہ پیروی منکرہ کریں۔

لہذا وکالت نامہ دیکھ دیا کہ سند ہے۔

الرقوم ۱۵-۰۵-۲۲

القید

القید

القید

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ارباب نیفا اتمال
ایڈوکیٹ

سیدہ الشہداء
ایڈوکیٹ

وحدیہ

محمد کواز
ایڈوکیٹ

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

APPEAL No. ^{SB} 831, 832 & 833 of 20²²

Waheedullah & (2) other

Appellant/Petitioner

Versus

DEO (M) ESSE Department

RESPONDENT(S)

Respondent (1)

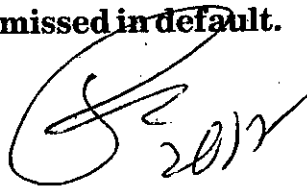
DEO (M) ESSE Department

Notice to Appellant/Petitioner

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 02/08/2022 at 9:00 AM

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

For Reply
Copy of appeal
is attached

 20/22

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

“A”

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

APPEAL No. 831, 832 & 833 ^{SB} of 2022.

Wahed. Ullah & (2) other

Appellant/Petitioner

Versus

DEO (M) ESSE Department

RESPONDENT(S)

Respondent (2)
Notice to Appellant/Petitioner Director ESSE Department
Peshawar

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 02/08/2022 at 9:00 am

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

For Reply
Copy attached

[Signature]
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[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

APPEAL No. 831, 832 & 833 of 2022. SB

Waheed Allah & (2) other

Appellant/Petitioner

Versus

DEO (M) ESSE Department

RESPONDENT(S)

Respondent (3)

Secy, ESSE Department

Notice to Appellant/Petitioner

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 02/08/2022 at 9:30 AM 831, 832 & 833

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

For Reply
copy attached

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

[Signature]
SECRETARY DIARY
No. _____
