Service Appeal No. 4280/2021

10.11.2022

Learned counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advočate General for official respondents present. None present on behalf of private respondents.

Reply/comments on behalf of respondents No. 1 to 4 have already been submitted, while respondents No 6 & 7 have also placed reliance on the same. Learned Assistant Advocate General stated that respondent No. 5 also relies on the written reply already submitted by respondents No. 1 to 3.

Vide previous order sheet dated 06.10.2022, the appellant was directed to submit envelops and tickets for issuance of notices to respondents No. 5 & 8 but he did not submit the same, therefore, last chance is given to the appellant to submit the envelops and tickets for issuance of notice to private respondent No. 8 within 03 workings days from today in office. After submission of envelops and tickets by the appellant, fresh notices be issued to private respondent No. 8 for submission of reply/comments on 07.12.2022 before the S.B at Camp Court Swat.

> (Salah-Ud-Din) Member (J) Camp Court Swat

08.09.2022

Appellant in person present. Mr. Asif Masood Ali Shah, Deputy District Attorney alongwith Mian Asif Ali Shah, ADEO (Litigation) and Mr. Afzal Ali, Section Officer on behalf of official respondents No. 1 to 7 present. None present on behalf of private respondent No.8.

Reply/comments on behalf of official respondents No. 1 to 3 have already been considered vide order sheet dated 07.06.2022 while reply/comments on behalf of official respondents No. 4 submitted today which are placed on file. Copy of the same handed over to the appellant. Reply/comments on behalf of official respondents No. 5 to 7 and private respondent No 8 are still awaited. Learned Deputy District Attorney seeks time to contact the official respondents No. 5 to 7 for submission of reply/comments. Previous date was changed on the strength of Reader's Note, therefore, notice be issued to private respondent No. 8 for submission of reply/comments. Last opportunity is granted. Adjourned. To come up for reply/comments of official respondents No. 5 to 7 and private respondent No. 8 before the S.B. on 06.10.2022 at Carp Court Swat.

> (Mian Muhammad) Member (E) Camp Court Swat

06.10.2022

Appellant in person present.

Riaz Khan Paindakhel, learned Assistant Advocate General present. Jamil Khan Senior Auditor for respondents No.6 & 7 present. Nemo for respondents No.5 & 8.

Reply on behalf of respondents No.1 to 4 has already been submitted. Representative of respondents No.6 & 7 submitted reliance report and stated that the respondents No.6 & 7 rely upon the reply of respondents No.1 to 3. Appellant is directed to submit envelops and tickets for notice to respondents No.5 & 8 for reply. To come up for reply/comments of respondents No.5 & 8 on 10.11.2022 before S.B at Camp Court, Swat.

(Rozina Rehman) Member (J) Camp Court Swat



· . . .

07.07.2022

Appellant present in person. Written reply on behalf of respondents No. 1 to 3 have already been considered vide order sheet dated 07.06.2022.

Muhammad Shafiq, Assistant for respondent No. 4 present. Mr. Noor Zaman, District Attorney present on behalf of respondents No. 5 to 7 and seeks time for submission written reply/comments.

No one present on behalf of private respondent No. 8. Therefore, notice be issued for submission of written reply/comments on 04.08.2022 before S.B at camp court, Swat.

(Fareeha Paul) Member (E) Camp Court, Swat , Ave to Summer Vacation the case is adjourned to 8-9. 22 for the came.

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7th June, 2022

None for the appellant present. Mr. Kabirullah Khattak, Addl: AG for respondents present.

Learned AAG referred to the order sheet of the Hon'ble High Court, Peshawar dated 09.03.2021 wherein the writ petition was converted into appeal in view of the judgment of the august Supreme Court of Pakistan in the case of "Muhammad Akram vs DCO, Rahim Yar Khan and others reported as 2017 SCMR 56" and had directed to transmit the writ petition alongwith all documents to this Tribunal for decision in accordance with law and rules. Learned AAG also submitted that the comments on behalf of respondents No. 1 to 3 had already been submitted, which according to the directions of the Hon'ble Peshawar High Court, Peshawar, had been sent to this Tribunal, therefore, that might reply be considered as reply on behalf of respondents No. 1 to 3 and other respondents may be directed to submit written reply/comments. Order accordingly. To come up for written reply/comments of respondents No. 4 to 8 on 07.07.2022 before the **D**.B at camp court Swat.

(Kalim Arshad Khan) Chairman Camp Court Swat 07.02.2022 Tour is hereby canceled .Therefore, the case is adjourned to 04.04.2022 for the same as before at Camp Court Swat.

04.04.2022

Appellant in person present. Mr. Noor Zaman Khattak, District Attorney present.

Previous date was changed on Reader Note, therefore, notices be issued to official respondents No. 1 to 7 as well as private respondent No. 8 through registered post and to come up for submission of written reply/comments on 11.05.2022 before the S.B at Camp Court Swat.

> (Salah-Ud-Din) Member (J) Camp Court Swat

11.05.2022

Clerk of learned counsel for the appellant present. Mr. Naseeb Khan, Section Officer on behalf of official respondent No. 4 alongwith Mr. Noor Zaman Khattak, District Attorney present.

Vide previous order sheet, it was ordered that notices be issued to official respondents as well as private respondent No. 8 through registered post, however on perusal of the record, it transpired that the same have not been sent to them, therefore, in this respect explanation be called from the Muharrar. Notices be issued to official respondents No. 1 to 3, 5 to 7 as well as private respondent No. 8 through registered post and to come up for submission of written reply/comments on 07.06.2022 before the S.B at Camp Court Swat.

(Salah-Ud-Din) Member (J) Camp Court Swat 06.12.2021

Appellant alongwith his counsel present.

Mr. Muhammad Rasheed, Deputy District Attorney for respondents present.

Appellant submitted copies of memorandum of appeal which are placed on file. The same be issued to respondents with direction to submit written reply/comments. Adjourned. To come up for written reply/comments on 03.01.2022 before S.B at Camp Court Swat.

(Atiq Ur Rehman Wazir) Member (E) Camp Court, Swat

03.01.2022

Appellant in person present.

Vide order dated 06.10.2021 it was directed that notices be issued to the respondents for submission of written reply/comments, however the same have not been issued, therefore, explanation in this respect be called from Moharrar. Notices for submission of written reply/comments be issued to the respondents through registered post and to come up for submission of written reply/comments on 07.02.2022 before the S.B at Camp Court Swat.

(Salah-Ud-Din) Member (J) Camp Court Swat 06.10.2021

Appellant present through counsel.

He submitted memorandum of appeal which is placed on file. Notice be issued to respondents with direction to submit written reply/comments in office within 10 days of the receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, the office shall submit the file with a report of noncompliance. To come up for arguments on 06.12.2021 before D.B at Camp Court, Swat.

(Atiq ur Rehman Wazir)

Member(E) Camp Court, Swat (Rozina Rehman) . Member(J)

Carhp Court) Swat

27.07.2021

Appellant Flan

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Counsel for the appellant present. Preliminary arguments heard.

The appellant had approached the Hon'ble Peshawar High Court Peshawar through Writ Petition No. 775-M/2019 and when the said Writ Petition came up for hearing before the said court, it was diverted to this Tribunal vide order dated 09.03.2021, after its conversion to Service Appeal. In compliance with the said order, Addl. Registrar of the Peshawar High Court Peshawar Mingora Bench sent the file of the Writ Petition here vide his office letter No. 1153/Writ Petition, dated 24.03.2021; and accordingly, the same was registered as Service Appeal No. 4280/2021. The appellant is directed to file the proper memorandum of appeal before the next date. However, the Writ Petition already treated as service appeal is admitted for regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, the office shall submit the file with a report of non-compliance. File to come up for arguments on 04.10.2021 before the D.B. at camp court, Swat.

Form-A

FORM OF ORDER SHEET

Court of_

4280 /2021

	Case No	4280 /2021
S.No.	Date of order Proceedings	Order or other proceedings with signature of judge
1	2	3
1	30/03/2021	The present appellant initially went in Writ Petition before the Hon'ble Peshawar High Court Mingora Bench and the Hon'ble High Court vide its order dated 09.03.2021 treated the Writ Petition into an appeal and sent the same to this Tribunal for decision in accordance
		with law. The same may be entered in the Institution Register and put up to the worthy Chairman for further order please. REGISTRAR This case is entrusted to S. Bench Peshawar. Notices be
2-	9/06/21	issued to appellant/counsel for preliminary hearing on 27/07/2021
		CHARMAN
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<u>BEFORE THE SERVICES TRIBUNAL KHYBER PAKHTUNKHWA,</u> <u>PESHAWAR</u>

· Salar in A

Service Appeal No. 4280/2021 Mr. Fazal Haqani.

Appellant

SCANNED

KP S3

Versus

Secretary to Govt. of Khyber Pakhtunkhwa Finance Department and others.

Respondents

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Service Appeal No. 4280/2021 Mr. Fazal Haqani

CANNED KPSI Peshawar Appellant

VERSUS

- 1. The Secretary, Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar.
- 2. The Director, Elementary & Secondary Education Department, Khyber Pakhtunkhwa Peshawar.
- 3. The District Education Officer, (Male) District Shangla.
- 4. The Secretary Finance Department, Khyber Pakhtunkhwa, Peshawar.
- 5. The Secretary Establishment Department, Khyber Pakhtunkhwa, Peshawar
- 6. Accountant General of Khyber Pakhtunkhwa at Peshawar.
- 7. District Accountant Officer Shangla at Alpurai.

8. Atta ur Rahman S/o Bahrul Uloom R/o Kormang, District Shangla.

Respondents

PARAWISE COMMENTS ON BEHALF OF RESPONDENT NO.04

Respectfully Sheweth.

Secretary to Government of Khyber Pakhtunkhwa, Finance Department (Respondent No.04) do hereby endorse/relies on the Para-wise Comments already filed before the Honorable Services Tribunal Khyber Pakhtunkhwa by the Principal Respondents No. 01, 02 03.

The Para-wise Comments of Respondents No. 01, 02, 03 may be treated as reply of (Respondent No.04) Secretary Finance Department Government of Khyber Pakhtunkhwa as well.

SECRETARY FINANCE GOVT.OF KHYBER PAKHTUNKHW (RESPONDENT NO.04)

Service Appeal No. 4280/2021 Mr. Fazal Haqani.

Appellant

Versus

Secretary to Govt. of Khyber Pakhtunkhwa Finance Department and others.

Respondents

Reply /Parawise Comments on Behalf of Secretary Finance Govt. of Khyber Pakhtunkhwa Respondent No.-04

AFFIDIVAIT

I Afzal Ali, Section Officer Govt.of Khyber Pakhtunkhwa Finance Department do hereby solemnly affirm and declare on oath that the contents of Para-wise Comments in Service Appeal No. 4280/2021 on behalf of Secretary to Govt. of Khyber Pakhtunkhwa Finance Department is true and correct to the best of my knowledge and belief and that nothing has been concealed from the Honourable Tribunal.





Service Appeal No. 4280/2021 Mr. Fazal Haqani.

Appellant

Versus

Secretary to Govt. of Khyber Pakhtunkhwa Finance Department and others.

Respondents

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S#.	Subject	Annexure	Page No.
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Service Appeal No. 4280/2021 Mr. Fazal Haqani

Appellant

VERSUS

- 1. The Secretary, Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar.
- 2. The Director, Elementary & Secondary Education Department, Khyber Pakhtunkhwa Peshawar.
- 3. The District Education Officer, (Male) District Shangla.
- 4. The Secretary Finance Department, Khyber Pakhtunkhwa, Peshawar.
- 5. The Secretary Establishment Department, Khyber Pakhtunkhwa, Peshawar
- 6. Accountant General of Khyber Pakhtunkhwa at Peshawar.
- 7. District Accountant Officer Shangla at Alpurai.
- 8. Atta ur Rahman S/o Bahrul Uloom R/o Kormang, District Shangla.

Respondents

PARAWISE COMMENTS ON BEHALF OF RESPONDENT NO.04

Respectfully Sheweth.

Secretary to Government of Khyber Pakhtunkhwa, Finance Department (Respondent No.04) do hereby endorse/relies on the Para-wise Comments already filed before the Honorable Services Tribunal Khyber Pakhtunkhwa by the Principal Respondents No. 01, 02 03.

The Para-wise Comments of Respondents No. 01, 02, 03 may be treated as reply of (Respondent No.04) Secretary Finance Department Government of Khyber Pakhtunkhwa as well.

SECRETARY FINANCE GOVT.OF KHYBER PAKHTUNKHWA, (RESPONDENT NO.04)

Service Appeal No. 4280/2021 Mr. Fazal Haqani.

Appellant

Versus

Secretary to Govt. of Khyber Pakhtunkhwa Finance Department and others.

Respondents

<u>Reply /Parawise Comments on Behalf of Secretary Finance Govt. of</u> <u>Khyber Pakhtunkhwa Respondent No.-04</u>

AFFIDIVAIT

I Afzal Ali, Section Officer Govt.of Khyber Pakhtunkhwa Finance Department do hereby solemnly affirm and declare on oath that the contents of Para-wise Comments in Service Appeal No. 4280/2021 on behalf of Secretary to Govt. of Khyber Pakhtunkhwa Finance Department is true and correct to the best of my knowledge and belief and that nothing has been concealed from the Honourable Tribunal.



ponent

Service Appeal No. 4280/2021 Mr. Fazal Haqani.

J.

Appellant

Versus

Secretary to Govt. of Khyber Pakhtunkhwa Finance Department and others.

Respondents

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Service Appeal No. 4280/2021 Mr. Fazal Haqani

<u>Appellant</u>

VERSUS

- 1. The Secretary, Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar.
- 2. The Director, Elementary & Secondary Education Department, Khyber Pakhtunkhwa Peshawar.
- 3. The District Education Officer, (Male) District Shangla.
- 4. The Secretary Finance Department, Khyber Pakhtunkhwa, Peshawar.
- 5. The Secretary Establishment Department, Khyber Pakhtunkhwa, Peshawar
- 6. Accountant General of Khyber Pakhtunkhwa at Peshawar.
- 7. District Accountant Officer Shangla at Alpurai.

8. Atta ur Rahman S/o Bahrul Uloom R/o Kormang, District Shangla.

Respondents

PARAWISE COMMENTS ON BEHALF OF RESPONDENT NO.04

Respectfully Sheweth.

Endorse/Relies

Secretary to Government of Khyber Pakhtunkhwa, Finance Department (Respondent No.04) do hereby endorse/relies on the Para-wise Comments already filed before the Honorable Services Tribunal Khyber Pakhtunkhwa by the Principal Respondents No. 01, 02 03.

The Para-wise Comments of Respondents No. 01, 02, 03 may be treated as reply of (Respondent No.04) Secretary Finance Department Government of Khyber Pakhtunkhwa as well.

SECRETARY FINANCE GOVT.OF KHYBER PAKHTUNKHWA, (RESPONDENT NO.04)

Service Appeal No. 4280/2021 Mr. Fazal Haqani.

Appellant

Versus

Secretary to Govt. of Khyber Pakhtunkhwa Finance Department and others.

Respondents

<u>Reply /Parawise Comments on Behalf of Secretary Finance Govt. of</u> <u>Khyber Pakhtunkhwa Respondent No.-04</u>

AFFIDIVAIT

I Afzal Ali, Section Officer Govt.of Khyber Pakhtunkhwa Finance Department do hereby solemnly affirm and declare on oath that the contents of Para-wise Comments in Service Appeal No. 4280/2021 on behalf of Secretary to Govt. of Khyber Pakhtunkhwa Finance Department is true and correct to the best of my knowledge and belief and that nothing has been concealed from the Honourable Tribunal.



onent

BE©ORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR, CAMP COURT AT GULKADA, SWAT

. . .

Service Appeal No. <u>4280</u> / 2021

Mr. Fazal Haqani.

... Appellant

VERSUS

Secretary E&SE and others.

...Respondents

Parawise comments on behalf of respondents No. 6 & 7

Respectfully Sheweth:

Accountant General of Khyber Pakhtunkhwa at Peshawar and District Accountant Officer Shangla at Alpurai (Respondents No. 6 & 7 respectively), do hereby endorse / relies on the parawise comments already filed before the Hon'ble Service Tribunal Khyber Pakhtunkhwa, by the principal respondents No. 1, 2 and 3.

The parawise comments of respondents No. 1, 2 and 3 may be treated as reply of present respondents No. 6 & 7 i.e. Accountant General of Khyber Pakhtunkhwa at Peshawar and District Accountant Officer Shangla at Alpurai.

Accountant General Khyber Pakhtunkhwa, (Respondent No. 6)

District Accountant Officer

Shangla at Alpurai (Respondent No. 7)

... Appellant

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR

Service Appeal No. _____ / 2021

Fazal Haqani S/o Fazal Mubin R/o Zara, Dherai, Tehsil Alpurai, District Shangla.

· VERSUS--

- Government of Khyber Pakhtunkhwa through Secretary of Elementary & Secondary Education at Civil Secretariat Peshawar.
- Director of Elementary & Secondary Education, . Government of Khyber Pakhtunkhwa at Peshawar.
- 3. District Education Officer (M)Shangla.
- 4. Secretary to Government of Khyber Pakhtunkhwa, Finance Department at Peshawar.
- 5. Secretary to Government of Khyber Pakhtunkhwa, Establishment Department at Peshawar.
- 6. Accountant General of Khyber Pakhtunkhwa at Peshawar.
- 7. District Accountant Officer Shangla at Alpurai.
- 8. Attaur Rahman S/o Bahrul Uloom R/o Kormang, District Shangla.

...Respondents

Appeal Under Section 4 of the Service Tribunal Act, 1974.

Respectfully Sheweth;

 That appellant is bonafide resident of Zara, Dherai, Tehsil
 Alpurai, District Shangla (Copy of NIC of appellant is annexure A). That vide letter No. 3356-34 dated 31-12-2004, the appellant was appointed as Theology Teacher (TT) (Male) in Government Middle School Banr, District Shangla (Copy of appointment order is attached as annexure B).

3. That vide order Endst No. 3994-4000/File No.1/Promotion Senior TT B-16 Dated Peshawar the 28-05-2013, the appellant was promoted against the post of Senior TT (BPS-16) at Government High School Dehrai, Alpurai, District Shangla, however, later on vide office order / adjustment Endost: No. 2804-10 dated 03-06-2013, the appellant adjusted / transferred to the above said school in pursuance of the notification dated 28-05-2013 (Copies of notification dated 28-05-2013 and order dated 03-06-2013 are attached as annexure C & D).

- 4. That vide order Endost: No. 2938-42 dated 28-08-2017, the education department has promoted a junior one from STT to SST, despite the fact that appellant is senior, who is at serial No. 3 in the appointment order list, has been illegally dropped and respondent No. 8, who is at serial No. 17 in the above said appointment order list has been promoted from the post of Senior Theology Teacher (STT) to Secondary School Teacher (SST) (Copies of order dated 28-08-2017 is annexure E).
- 5. That after getting knowledge of the above said impugned promotion / upgradation of respondent No. 8, and another notification Endst: No. 4681-86/File No.2/Promotion SST B-16

Dated Peshawar the 22-02-2019, wherein some posts of STTs were upgraded to SSTs, but again appellant was illegally and unlawfully dropped and one Muhammad Karim S/o Mohammad Hanif R/o Maira, District Shangla, who was at serial No. 6 in the appointment order list, was upgraded instead of appellant, against which appeal was filed by appellant, and the District Education Officer (M) Shangla / respondent No. 3 constituted a committee for recommendations, however after thorough inquiry of the committee constituted by respondent No. 3, the upgradation / promotion of Muhammad Karim was declared illegal, however the upgradation / promotion of respondent No. 8 remained undecided (Copies of notification, appeal, order dated 30-03-2019 of respondent No. 3 and order of respondent No. 2 are attached as annexure F, G, H & I respectively).

Page | 3

6. That appellant for several times has orally requested the official respondents to prepare seniority list of appellant, but the official respondents are clearly denying to prepare and handover the seniority list of appellant.

7. That being aggrieved from inactions, discriminatory attitude of respondents, the appellant has no other adequate and efficacious remedy, thus approached this august court inter alia on the following grounds.

<u>GROUNDS:</u>

- That inaction and denial of the respondents to give promotion / upgradation to appellant from STT to SST is illegal, unlawful and against the principles of law and justice.
- ii. That under the terms of policy, the appellant was entitled to promotion / upgradation in SST being senior from respondent No. 8.

iii. That though the appellant stood at serial No. 3 with merit position 49.22 and respondent No. 8 at serial No. 17 with merit position 40.72 at initial appointment order list, but even then the official respondents have illegally and unlawfully upgraded / promoted the respondent No. 8 instead of appellant being meritorious. That the appointing authority illegally and without preparing an authentic seniority list, has favoured respondent No. 8 and promoted / upgraded him to the posts SST, whereas the policy needs seniority cum fitness and as per rules and Civil Servant Act, 1973, no vested right to particular seniority is allowed, thus the official respondents have made clear discrimination with the appellant.

iv.

vii.

v. That according to the prevailing promotion policy of education department, 4% quota is reserved for promotion from STT to \$ST on seniority cum fitness base, but even then appellant has not been promoted.

vi. That fundamental rights of the appellant has been violated by the respondents.

That promotions / upgradations of private respondents are in clear violation of established rules, law and policy and the appellant is entitled to be considered as SST.

viii. That respondents have no power and authority to deprive the appellant from his accrued right of upgradation / promotion.

ix. That the education department for their ulterior motives has consciously omitted discrimination with the appellant.

x. That the education department / official respondents without adopting proper procedure have filled the SST posts without considering the appellant.

xi. That respondents are not authorized to deny the preparation of seniority list.

xii. Any other grounds not specifically raised will be argued with prior permission of this august court. It is therefore very humbly prayed that, on acceptance of the instant writ petition;

Inaction and denial of respondents from promotion / upgradation of appellant, may please be declared null and void.

· i. .

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iv.

- Office Order Endost: No. 2938-42 dated 28-08-2017, may please be rectified and modified to the extent of giving promotion / upgradation to the appellant.
- The appellant may please be declared to be entitle to promotion / upgradation from STT to SST.
- The respondents may please be directed to promote / upgrade the appellant from STT to SST with all back benefits.

Any other relief not specifically prayed but this august court deems proper may also be granted.

Appellant Through Counsel

Syed Salvanat Khan Advocate High Court Dated: 06-10-2021

Service Appeal No. _____ / 2021

Fazal Haqani

...Petitioner

Govt: of KP and others.Respondents

- VERSUS -

<u>Certificate</u>

It is certified as per information of my client that no such like other service appeal has been earlier filed before this Hon'ble tribunal

> Appellant Through Counsel

Syed Sollanat Khan Advocate High Court

PESSAWAR HIGH COURT, MINGORA BENCH (DAR-UL-QAZA), SWAT

	FORM OF ORDER SHEET
Court	of
	No of
Date of Order or Proceedings	Order or other Proceedings with Signature of Judge and that of parties or counsel where necassary.
1	2
09-03-2021	W.P.No. 775-M/2019 with Interim Relief
	Present: Syed Sultanat Khan, Advocate for het petitioner.
	Mr. Haq Nawaz, Asst:A.G for the official respondents.

	WIQAR AHMAD, J This order is directed to
· · ·	dispose of the petition filed by petitioner, under
	Article 199 of the Constitution of Islamic Republic of
,	Pakistan, 1973 (hereinafter referred to the
	"Constitution"), with the following prayer;
· · · · · · · · · · · · · · · · · · ·	"It is therefore very humbly prayed that on acceptance of the instant writ petition;
	i. Inaction and denial of respondents from promotion/upgradation of petitioner, may please be declared null and void;

ji. Office order Endst No. 2938-42 dated 28.08.2017 may please be rectified and modified to the extent of giving promotion/upgradation to the petitioner

iii. The petitioner may please be declared to be entitled to promotion/upgradation from STT to SST;

The respondents may please be iv. directed to promote/upgrade the petitioner from STT to SST with

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MON'ELE MR. JUSTICE (INTIAO IRRAMIM MON'ELE MR. JUSTICE WIQAR AMMAD

Any other relief not specifically prayed but this august Court deems proper may also be

adall-back benefits;

granted."

2. The case was heard at some length, however when learned counsel for petitioner was asked with regard to jurisdictional contours of this Court in view of the bar contained in Article 212 of the Constitution, he stated that this Court has got no jurisdiction to entertain the petition in hand. He however requested that the instant petition may be converted into a service appeal and same may be sent to the Khyber Pakhtunkhwa Service Tribunal for adjudication.

3. Request of learned counsel for petitioner seems genuine, which is allowed. The instant writ petition is converted into an appeal in view of the law laid down by the august Supreme Court of Pakistan in its judgment given in the case of <u>Muhammad Akram vs DCO, Rahim Yar Khan</u> and others reported as 2017 SCMR 56 and office is directed to transmit the same along with annexures and comments etc, to the Khyber Pakhtunkhwa Service Tribunal, who shall decide the appeal of

HOM'BLE MR. INSTICE ISHTIAO IBRAHIM HON'BLE MR. INSTICE WIGAR AHMAD

(D.B)

ubdud Sab

1977 - 1987 A Ż petitioner according to law. Copy of the same be . retained for office record. ويعتبون تتتبي الجافشية الله فريق وجه . ال <u>Announced</u> Dt: 09.03.2021 JUDGE **MOGE** Certified to be True Copy TEXAMINER Personal Sligh Court, Mingora/Dar-ul-Qaža, Swat Autaorized Buder Acteds 07 at Oneons-o Shahadat Urder 1984 OTRICE 11/3 tul Sati HON'RLE MR. JUSTICE ISHTIAO IBRAHIM HON'RLE MR. JUSTICE WIOAR AHMAD (D.8)

BEFORE THE PESHAWAR HIGH COURT MINGORA BENCH DARUL QAZA SWAT

Writ Petition No.775-M/2019

Fazal Haqani S/O Fazal Mobin R/O Zara Dherai Tehsil Alpurai District Shangla.

(Petitioner)

2-1

VERSUS

- 1. The Government of Khyber Pakhtunkhwa through Secretary (E&SE) Khyber Pakhtunkhwa Peshawar.
- 2. The Director E & SE Khyber Pakhtunkhwa Peshawar.
- 3. The District Education Officer (M) at Alpural District Shangla.
- 4. Secretary to Government of Khyber Pakhtunkhwa Finance Department at Peshawar.
- 5. Secretary to Government of Khyber Pakhtunkhwa Establishment Department at Peshawar.
- 6. Accountant General of Khyber Pakhtunkhwa at Peshawar.
- 7. District Accountant officer Shangla at Alpurai.
- 8. Attaur Rahman S/O Bahrul Uloom R/O Kormang District Shangla.

(Respondents)

S.NO	Description of Documents	Annexure	Pages
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3	Merit List	(A)	4-7
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Deponent

Mian Asif Ali Shah S/O Jam Mian Assistant District Education Officer (M) Shangla

* BEFORE THE PESHAWA

Writ Petition No.775-M/2019

WINGORA BENCH DARUL OAZA SWAT . 4280/21 Anno

📌 azal Haqani S/O Fazal Mobin R/O Zara Dherai Tehsil Alpurai District Shangla.

<u>VERSUS</u>

- 1. The Government of Khyber Pakhtunkhwa through Secretary (E&SE) Khyber Pakhtunkhwa Peshawar.
- 2. The Director E & SE Khyber Pakhtunkhwa Peshawar.
- 3. The District Education Officer (M) at Alpural District Shangla.
- 4. Secretary to Government of Khyber Pakhtunkhwa Finance Department at Peshawar.
- 5. Secretary to Government of Khyber Pakhtunkhwa Establishment Department at Peshawar.
- 6. Accountant General of Khyber Pakhtunkhwa at Peshawar.
- 7. District Accountant officer Shangla at Alpural.
- 8. Attaur Rahman S/O Bahrul Uloom R/O Kormang District Shangla.

(Respondents)

(Petitioner)

PARAWISE COMMENTS ON BEHALF OF RESPONDENT NO 1, 2 & 3. PRELIMINARY OBJECTIONS:-

- 1. The Petitioner has no cause of action/locus standi.
- 2. The Petitioner has concealed the material facts from this Hon: Court, hence liable to be dismissed.
- 3. The Petitioner has not come to this Hon: Court with clean hands.
- 4. The Petitioner has filed the instant Writ Petition just to pressurize the respondents.
- 5. The Petitioner has filed the instant petition on mala fide motives.
- 6. The Petition may be dismissed being badly time barred.
- 7. That the impugned order No. 2938-42 dated 28/08/2017 is lawful and liable to be maintained.

Respectfully Sheweth:

FACTS.

- 1. Correct as per record.
- 2. Correct as per record of this office.
- 3. Correct.
- 4. Incorrect because the respondent No. 8 was promoted to STT vide Notification No. 3994-4000/File No.1/Promotion Senior TT B-16 dated Peshawar the 28/05/2013 on the basis of the Seniority list issued at that time wherein the respondent No. 8 was at S# 33 while the Petitioner was at S# 63 who had not B.Ed which was the basic requirement for SST Post. (Copy of Seniority list is attached as Annexure "A")
- 5. Incorrect and baseless because the Petitioner submitted an appeal dated 30/01/2019 complaining against Mr. Muhammad karim not against the respondent No. 8 (Copy of Appeal Is attached as Annexure") which shows that he had no interest to be promoted to SST but just make the process disputed after the laps of approximately two years, being badly time bared. Furthermore, on the said appeal an enquiry committee was constituted in light of the Director letter No. 9720 dated 26/01/2019 to probe into the matter and the enquiry officer recommended Mr. Khalilullah (as he also submitted an appeal) for promotion as SST. (Copy of Mr. Khalilullah Appeal is attached as Annexure "C" & Copy of the said enquiry is attached as Annexure "D")

- incorrect and baseless as no correspondence regarding the issue of seniority list was carried out.
- 7. No need to comments. Therefore, the Impugned order dated 28/08/2017 being lawful may be maintained on the following grounds.

GROUNDS:-

- I. Incorrect.
- II. Incorrect as the respondent No. 8 was promoted as per existing policy.

III. Incorrect, the respondent No. 8 was promoted to post of SST on the basis of Seniority list of STT wherein the petitioner is junior to the respondent No. 8.(Copy of the said order is attached as Annexure "E")

IV. Incorrect and baseless as replied above.

V. Correct to the extent that 4% quota is reserved for promotion from STT to SST.

VI. Incorrect & baseless.

VII. Incorrect

VIII. Incorrect.

IX. Incorrect as this office is bound to follow the Rules & Regulations.

X. Incorrect

XI. No need to comment.

PRAYER:-

In view of the above, it is therefore, most humbly prayed that by acceptance of these Comments, the instant Writ Petition being badly time bared, unlawful & Speculative may graciously be dismissed with cost.

Respondent No 1

Secretary a

Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar

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SHORING Bleastary (as 1, cond-·· : Control Constant

Respondent No.2

Dire

Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar elester etter e

Respondent No.3

District Education Officer (M) **District Shangla**

BEFORE THE PESHAWA

JRT MINGORA BENCH DARUL QAZA SWAT

Writ Petition No.775-M/2019

4280/21

Fazal Haqani S/O Fazal Mobin R/O Zara Dherai Tehsil Alpurai District Shangla.

(Petitioner)

<u>VERSUS</u>

- 1. The Government of Khyber Pakhtunkhwa through Secretary (E&SE) Khyber Pakhtunkhwa Peshawar.
- 2. The Director E & SE Khyber Pakhtunkhwa Peshawar.
- 3. The District Education Officer (M) at Alpurai District Shangla.
- 4. Secretary to Government of Khyber Pakhtunkhwa Finance Department at Peshawar.
- 5. Secretary to Government of Khyber Pakhtunkhwa Establishment Department at Peshawar.
- 6. Accountant General of Khyber Pakhtunkhwa at Peshawar.
- 7. District Accountant officer Shangla at Alpurai.
- 8. Attaur Rahman S/O Bahrul Uloom R/O Kormang District Shangla.

(Respondents)

<u>AFFIDAVIT</u>

I Mian Asif Ali Shah Assistant District Education Officer O/O DEO (M) District Shangla do hereby solemnly affirm and declare on oath that the contents of these Parawise Comments are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

Deponent

Mian Asif Ali Shah S/O Jam Mian ASSISTANT DISTRICT EDUCATION OFFICER (M) SHANGLA

> CELL NO. 03008811866 CNIC NO. 15501-2279446-3

Dated: <u>0/ / 0]</u> 2020

Annexcise A". Annexare A"

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	S# Name of STT/IT With Place of Duty	Academic Qualification			BPS	Date of Birth		Date of	Date of	Date of	Date of Promotio	n Remarks	Des ig:
\$ -	1 2 1 FAZAL MABOOD GMS Chichloo	3	4		6	7	8	9	10	11			
┝		SSC	<u></u>		15	7-Jul-56	SHANGLA	A 12-Nov-80			12	13	14
-	2 TAJ RAHIM TT GMS Barghanshal		<u> </u>		15	3-Jan-57				12-Nov-80		3 rd Division	Π
-	e entre Builderia	<u>SY</u>	SY		15	30-Dec-60			6-Jul-82	27-Feb-82	<u></u>	No SSC	Π
-	4 IHSANULLAH GMS Shahtoot 5 M.IDRESS TT	ssc	SY		15	6-Sep-57	SHANGLA		15-Jul-82	6-Jul-82		No SSC	TT
-		SY	SY		15	30-May-60			14-Mar-84	15-Jul-82	- <u> </u>	3 rd Division	Π
-		+	SY		15	12-Aug-54			17/Mar/84	14-Mar-84		No SSC	TT
-	T ABOUL WAITE GWIS AROCH	SY	SY		15	4-Sep-56			2-Sep-84	17/Mar/84		No SSC	TT.
-		<u>SY</u>	SY		15	1-Nov-57	SHANGLA		11-Mar-85	2-Sep-84		No SSC	Π
	9 M.SHOIB GMS Dawlat Kalay 0 IHSANULLAH GMS Ajmir	SY	SY	ABDUL BARI	15	1-Sep-63	SHANGLA		11-Mar-85	11-Mar-85		No SSC	TT .
		SY	SY	NOORUL HUDA	15	15-May-63	SHANGLA	13-Apr-85	13-Apr-85	11-Mar-85	<u> </u>	No SSC	TT
;;	1 GULAB ROKHAN GHS Nakhtar 2 ABDUL HAI GMS Sundia	SY	SY	MONSHI	15	30-Nov-60	SHANGLA	30-Nov-85	30-Nov-85	13-Apr-85		No SSC	П
	SAYED QAYOUM GMS Larai	SY	<u> SY</u>	TAIMUR SHAH	15	3-Dec-56	SHANGLA	16-Jan-86	16-Jan-86	30-Nov-85	<u> </u>	No SSC	Π
1.	3 Pirkhana	SY	SY	MUFTEE MAULANA	15	27-May-64	SHANGLA	24-May-86	24-May-86	16-Jan-86		No SSC	Π
15		SY	SY	SAYED RAHMAT	15		SHANGLA	1-Mar-87	1-Mar-87	30-Apr-03		No SSC	π
		SY	SY	RAHMATULLAH	15		SHANGLA	11-May-87	11-May-87	1-Mar-87	<u> </u>	No SSC	<u>. /TE</u>
	MILYAS GHS Martung		SY	DAWLAT KHAN	15		SHANGLA	29/Nov/88	29/Nov/88	11-May-87		No SSC	<u> </u>
	MUHAMMAD DIN GMS Lodar	SSC SY	<u>SY</u>	ABDUR RAUF	16		SHANGLA	17-May-90	17-May-90	29/Nov/88		No SSC	<u> </u>
	MUHAMMAD ISMAIL GHS Pishloor	<u>SY</u>	SY	SAHIB ZADA	15		SHANGLA	19/May/90	19/May/90	17-May-90	1-Mar-13	No SSC	<u></u>
20		SSC SY	SY_	SHAMSUR RAHMAN	16	······································	SHANGLA	24-May-90	24-May-90	19/May/90		No SSC	<u></u>
	HANGA HANMAN GHS Manar Maira	<u>SY</u> MA	SY	MHALEEM	15		SHANGLA	13-Jan-91	13-Jan-91	24-May-90	1-Mar-13		STT
21	KHAN ZADA GHS Dandai	islamyat	SY	KHALLBALBAAN				10 0411-01		13-Jan-91		No SSC	Π
22	HANIFUR RAHMAN GHS Dara Serai	SY	SY	KHALI RAHMAN MASAOOD	16		SHANGLA	19-Jan-91	19-Jan-91	19-Jan-91	1-Mar-13		
<u>23</u>	MUMTAZUL HAQ GCMHS Chakisar	FA/SY	SY	AMIR ZAHID	15		SHANGLA	<u>30-Jan-91</u>	30-Jan-91	30-Jan-91		····	STT
24	ABOUL SALAM GMS Barkana	SY	I SY	SAHIB ZADA	16		HANGLA	25-Jun-92	25-Jun-92	25-Jun-92	1-Mar-13	······································	STT
25	MATIULLAH BMS Dawoot	SY	SY	MUHSIN	15		HANGLA	1-Jul-92	1-Jul-92	1-Jul-92			<u>π</u>
26	SALEUR RAHMAN GMS Terawray			ABDUL QASIM	15		HANGLA	9-Apr-93	9-Apr-93	9-Apr-93		11.000]]
<u>.7</u>	SAL-HUDDIN GHS Dherai (A)	MA		FAZAL MABOOD	15			14-Dec-92	20-May-93	20-May-93		No CCC	
				A A A A A A A A A A A A A A A A A A A	16	28-Apr-70 S	HANGLA	23-Jun-93	23-Jun-93		1-Mar-13		STT
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,	108	ABDUR RAHMAN GMS Gunangar 🗶	SY	SY	MUHAMMAD TAIB	15	24-Dec-56	SHANGLA	13-Aug-94	13-Aug-94	13-Aug-94		No SSC	ΠΠ]
ļ.		FAZLUL HAQ GHS Kass Lilownai	FA	ŚY	KHUKULAY	16	1-Mar-70	SHANGLA		8-Oct-95	8-Oct-95	1-Mar-13	1	STT	1
Æ	29	JEHAN ZADA GHS Basi	SSC SY	SY	USMAN ZARIN	16	6-Jun-72	SHANGLA		2-Nov-96	2-Nov-96	1-Mar-13	†	sπ	
1	31	ANWAR FAROOQ		SY	NOORUL MAB	15	1-May-64	SHANGLA	10/Apr/99	10/Apr/99	10/Apr/99	1	No SSC	Π	
		AMIR WAHID GHS Fiaza Puran	MA Islamyat	B.Ed	ABDUL WAHID	16	1-Jan-72	SHANGLA	1-Sep-97	1-Dec-99	1-Dec-99	1-Mar-13		STT],
		M.HABIB GHS Machkandai	MA Islamyat	SY	M.RAHMAN	16	1-Jan-77			1-Jan-05	1-Jan-05	1-Mar-13		STT	
Ŀ	34	ATAUR RAHMAN GHS Kormang	BA BA	SY	BAHRUL ULOOM	15	<u> </u>	SHANGLA	1-Jan-05	1-Jan-05 •	- 1-Jan-05	1-Mar-13	,	STT	
:	35	FAZLI AKBAR GHS Shang	MA Islamyat	SY	YOUSAF KHAN	16	1-Jun-75	SHANGLA	1-Jan-05	1-Jan-05	1-Jan-05	1-Mar-13		sп	1
:	36	M.KARIM GHS Dandai	FA	SY	M.HANIF	16	1-Sep-77	SHANGLA	1-Jan-05	1-Jan-05	1-Jan-05	1-Mar-13		STT	1
	37	KIRAMAT KHAN GHS Gharai Kandaw	SSC/SY	SY	MUKARAM KHAN	16	20-Feb-79	SHANGLA	1-Jan-05	1-Jan-05	1-Jan-05	1-Mar-13		STT	ĺ
:	38	NAZIR KHAN GHS Maira	SSC	SY	UMAR ZARIN	16	5-Mar-75	SHANGLA	1-Jan-05	1-Jan-05	1-Jan-05	1-Mar-13	1	STT	1
13	39	ZIA UL HAQ GHS Titwalan	SSC SY	SY	SERAJUL HAQ	16	1-Jan-72	SHANGLA	1-Mar-05	1-Mar-05	1-Mar-05	1-Mar-13	1	STT	1
4	40	ABDULLAH GHS Baina	BA/SY	SY	AMIR SULTAN	16	20-May-74	SHANGLA	1-Mar-05	1-Mar-05	1-Mar-05	1-Mar-13		STT	i
•	41	SARTAJ GHS Karora	MA Islamyat	SY	ABDUL GHAFOOR	16	5-Jun-74	SHANGLA	1-Mar-05	1-Mar-05	1-Mar-05	1-Mar-13		STT	İ.a.
			MA				++	,				1		- 311 -	i s I
4	12	SHER AFZAL GHS Danakool	<u>islamyat</u>	SY	KHALI ROKHAN	16	15-Dec-74	SHANGLA	1-Mar-05	1-Mar-05	1-Mar-05	1-Mar-13	<u> </u>	STT	Ι.
4		RAHMATULLAH GHS Opal	MA Islamyat	B.Ed	SAID ABASS	16	1-Mar-75	SHANGLA	1-Mar-05	1-Mar-05	1-Mar-05	1-Mar-13	۱ ۱	STE	
		KIFAYATULLAH GHS GHSS	TAICY							1			. 1	4	
		Shahpur	FA/SY	SY		16	15-Mar-75		1/Mar/05	1/Mar/05	1/Mar/05	1-Mar-13		<u></u>	ja,
1 4	<u>\$5 /</u>	ALI ABAS GHS Kotkay	SSC SY MA	SY	HAKIM KHAN MUHAMMAD	16	1-Apr-75	SHANGLA	1-Mar-05	1-Mar-05	1-Mar-05	1-Mar-13		STT	
4	.6	NOOR MUHAMMAD GHS Shikawlai	Islamyat	SY	GHYAS	16	2-May-75	SHANGLA	1-Mar-05	1-Mar-05	1-Mar-05	1-Mar-13		STT	
				1	MUHAMMAD			1					1		
		ZAINUL ABBEDIN GHSS Olandar	SSC SY		SAMIULLAH	16	25-May-75		1-Mar-05	1-Mar-05	1-Mar-05	1-Mar-13	<u> </u>	<u>STT</u>	
		NORUL AMIN GHS Sheshan Lilownai	BASY	SY	BEHROZ KHAN	16	24-Nov-75		1-Mar-05	1-Mar-05	1-Mar-05	1-Mar-13	<u> </u>	STT	
		UBAIDUR RAHMAN GHS Ranyal	BA		AMRALISTAN 1	16	<u>1-Jan-76</u>		1-Mar-05	1-Mar-05	1-Mar-05	1-Mar-13	t	STT	
50	무	IHSAN ULLAH GHS FAIZA	BA MA	SY	Muhammad Ghufran	16	1-Apr076	Shangla	1-Mar-05	1-Mar-05	1-Mar-05	1-Mar-13	·	STT	
51	1 1	KHALILULLAH GCMHS Alpurai	Islamyat	SY	ABDUL KHALIQ	16	1-Apr-76	SHANGLA	1-Mar-05	1-Mar-05	1-Mar-05	1-Mar-13	•	STT	
_52		SHAFIQ AFRAD GCMHS Alpurai	MA/M.Ed	M.Ed	GUL MAHMMAD	16	26-May-77	SHANGLA !	1-Mar-05	1-Mar-05	1-Mar-05	3-Jun-13		sп	
53		ABELL MALIK TT GHS Gharai Kawaw	BA/S.Y	S.Y	ZIAUL HAQ	16	12-Jun-77	SHANGLA	1-Mar-05	1-Mar-05	1-Mar-05	1-Mar-13		STT	
54	1. 7	ABDUL SHAKOOR GMS Drad	MA		BAHRUL ULOOM	15	12-Mar-78		1-Mar-05	1-Mar-05	1-Mar-05			Π	
55		SAMIUL HAQ GHS Puran	MA		FATEHUL ULOOM	16	10-Apr-78 \$		1-Mar-05	1-Mar-05	1-Mar-05	1-Mar-13		STT	
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56	NOORULLAH GHS Dherai Puran	MA	S.Y	HABIBUR RAHMAN	16	1-May-78	SHANGLA	1-Mar-05	1-Mar-05	1-Mar-05	1-Mar-13		<u>. STT</u>
		MA			16	2-Feb-79	SHANGLA	1-Mar-05	1 1 1 - 05	1-Mar-05	1-Mar-13		STT
	INAYATUL HAQ GHSS Sandovi	Islamyat	S.Y	FAZAL RABI			SHANGLA	1-Mar-05	<u>1-Mar-05</u>	1-Mar-05	1-(121-13		TT
58	SIRAJUD DIN TT	BA/B.Ed_	B.Ed	M.SADIQ	15	<u>1-Mar-79</u>	SHANGLA	1-1-Mar-05-1	1-Mar-05				<u> </u>
		MA Islamyat	SY	ABDUL QAYOUM	16	10-Apr-79	SHANGLA	1-Mar-05	1-Mar-05	1-Mar-05	1-Mar-13	·	sπ
	KHALID AHMAD GHS Alpurai # 2	SSC	SY	JALANDAR KHAN	16	10-Apr-80	1	1-Mar-05	1-Mar-05	1-Mar-05	3-Jun-13		STT
60	KHALID KHAN GHSS Chawga	MA				10-7.01-00							()
	HAKIMULLAH GHS Puran	Islamyat	SY	RAHAT GUL	16	1-Jan-81	SHANGLA	1-Mar-05	1-Mar-05	1-Mar-05	1-Mar-13		SΠ
61	MUHAMMAD YAQOUB GHS												1 1
	Kormang	<u>MA</u>	SY	AMIR ZAREEN	16	1-Mar-81		1-Mar-05	<u>1-Mar-05</u>	1-Mar-05	3-Jun-13		STT
V~ _	BAKHT MAND ZEB GHS Pagorai	FA/SY	SY	MUSAFAR	16	20-Apr-81	SHANGLA	1-Mar-05	<u>1-Mar-05</u>	1-Mar-05	<u>- 3 Jun 13</u>	·	<u>sπ</u>
	FAZAL HAQANI GHS Dherai Alpurai	BA	SY	FAZAL MUBIN	16	18-Mar-83	SHANGLA	1-Mar-05	1-Mar-05	1-Mar-05	3-Jun-13		STT
_ <u> </u>	ALI MUHAMMAD GMS Barbatkot	SSC SY	SY	MUHAMMAD SADIQ	15	1-Mar-79	SHANGLA	1-Mar-05	23-Dec-06	23-Dec-06			<u>π</u>
651	ALT MOTIVITIES ON OUTSIDE		1										/ _ '
え 前部 に		BA SY	SY	FAREDOON	15		SHANGLA	24-Jul-07	24-Jul-07	24-Jul-07			
mag-	JASEERWAR GMS Enawal	FA SY	SY	KAND FAROSH	15	18-Apr-79	SHANGLA	10-Oct-07	10-Oct-07	10-Oct-07			<u> = -</u>
68	ABDUL HAQ GMS Buneer Wall	['	SY	FAZLI RABBI	15	11-Apr-79	SHANGLA	1-Jan-11	1-Jan-11	1-Jan-11			<u>, </u>
-dest	ZIA UE ISLAM EMS Katkor	MA	SY	ABDUR RAZAQ	15	1-Mar-84	SHANGLA	1-Jan-11	1-Jan-11	1-Jan-11			<u>िंदान</u>
100 100	PARKELEAFPENS CHARTE	MA	8.Ed	SAFOOR RAHMAN	15		SHANGLA	31-Oct-11	31-Oct-11	31-Oct-11			ALC: N
	DILAWAR KHAN GMS Soor Kamar	1	SY	AMANULLAH KAHN'	15		SHANGLA	31-Oct-11	31-Oct-11	31-Oct-11			COLUMN STREET
	QARIBULLAH GMS Dedal Kamach	;	SY	FAZAL MULA	15		SHANGLA	31-Oct-11	31-Oct-11	31-Oct-11			
	SAJAD AHMAD GMS Deda Kamada	·	SY	ABDUL KABIR	15		SHANGLA	31-Oct-11	31-Oct-11	31-Oct-11			
-13-	SAJAD ANWAD GING Filadad	,		SADRATUL	1	11		· · · ·			100 A 100		
74	WAKIL AHMAD GHS Kadona	,/	SY	MUNTAHA	15	L	SHANGLA	31-Oct-11	<u>31-Oct-11</u>	<u>31-Oct-11</u>		C. Franciska and A. S.	A DEBUG
		, <u> </u>	[]	MUHAMMAD	مر ا			21 04 11	31-Oct-11	31-Oct-11	l		1 音音
	FARMAN ILAHI	لـــــــــــــــــــــــــــــــــــــ		ANWAR	15		SHANGLA	31-Oct-11		31-Oct-11	i		्रम्
76	RAHMANULLAH GMS Barbatkot	/	SY	FAZAL JAMIL MIAN	<u>15</u>	16-Apr-87	SHANGLA	31-Oct-11	31-Oct-11	31-Oct-11			
77	ABDUL BASIR GMS Kabalgram		SY	QARIBUR RAHMAN	15		SHANGLA	31-Oct-11	<u>31-Oct-11</u>				2 7 1 3 4 4 C
78	MUHAMMAD NASIR GMS Bazarkot		SY	NOOR HASSAN	15	<u> </u>	SHANGLA	31-Oct-11	<u>31-Oct-11</u>	31-Oct-11		1	1.200
79	M.ZIAUR RAHAMN GMS Karin Dara		SY	MUHAMMAD AYAZ	15		SHANGLA	31-Oct-11	_31-Oct-11	31-Oct-11	·		1-26月2
		M.A	SY	JAMILUD DIN	15	10.M.W. 1980	SHANGLA	31-Oct-11	31-Oct-11	31-Oct-11			
	IKRAMULLAH GMS Kerai	1	SY	NAJMULLAH	, 15		SHANGLA	<u>31-Oct-11</u>	<u>31-Oct-11</u>	31-Oct-11	·	135.22 6 (14) 14	100000
	RAHMANI GUL GMS Banr	MA	MA	'MUQAM GUL	15	13-Nov-84	SHANGLA	31-Oct-11	31-Oct-11	<u>31-Oct-11</u>			1.200 CE
	RAHMATULLAH GMS Langbar									31-Oct-11		17 19	
	Chakesar			ABDUL WAHAB	15			<u>31-Oct-11</u>	31-Oct-11				
		•	SY	BAKHTYAR	15	1	SHANGLA	31-Oct-11	31-Oct-11	31-Oct-11		1000	Contract of
i 8 - 1	MUHAMMAD NAWAZ GMS Kerai			SAEEDULLAH JAN	15		SHANGLA	31/Oct/11	31/Oct/11	31/Oct/11		1 一 一 二 二 奥	In ADJOCAL

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Į !	86	RUHULLAH GMS Kuzbatkot		SY	MUHAMMAD ZAKIR	15	1-Jul-70	SHANGLA	14-Jan-91	1-Nov-11	1-Nov-11			l n l
7	87	ATTAULLAH KHAN	MA	B.Ed	JAN FRAZ	<u> 15 </u>	1-Jan-79	SHANGLA	6-Apr-99	1-Nov-11	1-Nov-11		· · · · · · · · · · · · · · · · · · ·	
		AHMAD NOOR GHS Alpurai # 2	MA ·	MA	MUHAMMADU DIN	15	15-Mar-80	SHANGLA	1-Nov-11	1-Nov-11	1-Nov-11	:	<u> </u>	
	89	HUSSIAN AHMAD GHS Kuzkana		SY	MUHAMMAD FAYAZ	15		SHANGLA	1-Nov-11	1-Nov-11	1-Nov-11		<u> </u>	
•		SAMIULLAH GHS Karora		SY	SHAKIRULLAH	15	-	SHANGLA	1-Nov-11	1-Nov-11	1-Nov-11			
	91	LATIFUL HAQ GHS Shawawoo	MA/B.Ed	B.Ed	KIFAYATULLAH	15	12-Mar-80	SHANGLA	1-Nov-11	1-Nov-11	1-Nov-11		· · · ·	
	92	MUHAMMAD ABASS GMS Chagum	MA	SY .	MENI	15	1-Jul-79	SHANGLA	1-Nov-11	1-Nov-11	1-Nov-11	·		
	93	MUHAMMAD RAHIM GMS Sangrai	BA	SY	FAZAL KAREEM	15	15-Oct-85	SHANGLA	1-Nov-11	1-Nov-11	1-Nov-11			
	94	WAQAR AHMAD GMS Larai	BA	SY	GUL MUHAMMAD	15	23-Apr-83		1-Nov-11	1-Nov-11	1-Nov-11			
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DISTRICT EDUCATION DIFICER (M) SHANGLA:

man cro a ير بختونوا ساور ا . دا تر ركد م (يژ Retio أداب! لمذارس ما ي كم من في تعلم من 1. 15 - 2 min ally a wite can a line of - 7. 7. 2 (m 8) 4 2004 من ترقى مانى - فى المحال من كورمند بالى كول لا همير البورى س شعبن ریا ہوں ۔ طالب SST ہرومونٹ ڈ کی سی میں میر ط الرفي مس كمترسى في ركريم كو أوليت دى بي جو تقرر نامه میں میرف لوزیش منبر 6 پر ہے جبکے اسی تقرنامہ میں، میں میر مل ہر سریل مزیر 3 ہر لیوں - 25 کوسط " - القررى بانا ميرا الولين حق ب- لعيزا ليل بير فرنت سم فحد کریم کی حگ میری تقرری T SS L لوسط جر تقرری کی احتامات صادر فرمای - فقط - به i for the فقل حقانى ST.T فقل حقال المورى فلم قسار الله الم Attested مون نيرا- 3449603454 · For Madin Forwarder to The DEO(11) El secy " Thangla for favorilats (Consideration M. 35911/15 9 145 Derar Alpurcie 19

mexicity of a bold it's the ferri of D.E.0 1 Clecka Distry No. 3 مرین (M) میں اخبر (M) میں (C) اور (M) میں (C) میں (M) میں (C) میں ن بنائگم، کرتر بکے دفتر سے مختلف کبر در . تر اس کی جاتی ہے کہ آب کے دفتر سے مختلف کبر در . یں بی کے لیے اور بی سی کے لیے درخواستوں کی SST مال موتي تقى جونكر سكولون كى خچشيان تقين اورىس كورىخ عقا، اس کے علاقہ فیس تک اور کو شن آپ سے تعبی میں واقعا منیں سوں تا ہم بروقت میں خبر نہیں سوا، جو نکہ سیاری کسی میں میر (نام میرٹی نے مطابق سے۔ کہزا میں آب کے خصور عاجزانہ اِلتماس کرتا ہوں کہ آپ میر بے یا جزاب ایک کو منظور کرتے اس بر کارروائی کریں کتو ب تاحیات د عاکو رموں ط فقل (Plat) Kn mls ر ب 6 تابع فرمان - خلیل ایش S.T.T گورتمند سنطنیل ما دار ر ب 6 تابع فرمان - خلیل ایش S.T.T Beloger Attested

OFFICE OF THE DIS

CONTACT NO.

ION OFFICER (M) SHANGLA LPURAI 51108- Fax # 851108

OFFICE ORDER

Consequent upon the appendix ived from Mr. Khalil Ullah STT GCMHS Alpurai and Mr.Fazal Haqani STT GHS Dherai Alpurai regarding their promotion (Copies Enclosed).

The following committee is hereby constituted to probe in to the matter and submit report with clear cut recommendations within a week time positively.

- 1. Mr.Muhammad Siraj Principal GHS Dherai
- 2. Mr. Muhammad Iqbal I/C Principal GHS Lilownai

Endst:No.

Endst:No.11/17 /EB(S)/Appeal/AT/TT . Copy of the above is forwarded to:-

(Muhamamd Amin) District Education Officer (M) Shangla Dated: /2019. -

(Chairman)

(Member)

- 1. PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar.
- 2. The Enquiry Officers concerned.
- 3: Teachers concerned.

DY: District Sd ion Officer (M)

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INQUIRY REPORT IN R/O MR& KHALIL ULLAH STT & MR. FAZAL HAQANI STT APPELLANTS FO

Introduction:-

Reference to the office order No.1025-27/EB(S)/Appeal/ATATT dated 30/3/2019 the appellate committee was constituted to dispose of the appeals submitted by Mr. Khalii Ullah STT GCMHS Alpurai and Mr. Fazal Haqani STT GHS Dehrai Alpurai against the expected promotion of Mr. Muhammad Karim STT GHS Manai Maira to SST.

Brief history:-

Mr. Khalil Ullah, Mr. Faza Haqani and Mr. Muhammad Karim etc were appointed as TT vide order No, 3356-34 dated <u>31/12/2004 by</u> the competent authority DCO Shangla. According to the said appointment order Mr. Khalil Ullah S/O Abdul Khaliq stands on Serial No.01 with merit position 64.28 where as the Fizal Haqani S/O Fazal Mubin stands on serial No.3 with merit position 49.22 and Mr. Muhammad Karim S/O Muhammad Hanif stands on S. No.6 with merit position 44.82.

According to the existing rules, their seniority is to be determined from the date of their appointment in view of their merit position. The merit position has been highlighted in the preceding paragraph.

The current DPC for promotion to SST post for different cadres was held on 18/1/2019, wherein, Mr. Muhammad Karim STT was included in the working paper which aggrieved the appellants. The promotion order No. 4681-86 dated 22/2/2019 issued by the competent authority Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar placing the services of Mr. Muhammad Karim SST for promotion to SST on discretion of the DEO (M) Shangla for further posting.

The DEO (M) Shangla submitted a letter No. 10 dated 1/3/2019 to the Directorate E&SED Khyber Pakhtunkhwa, Peshawar requesting for postponing the promotion of Muhammad Karim in view of appeals submitted by the aggrieved appellants till settlement of

Shorth

Atter

Anneaure "E TTs (M) Shangla Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar DEORCM) Sharifla PH No. 091-9210389, 9210938, 9210437,9210957, 9210468 Fax 091-9210936,0800-33857 E-mail rufiq_kk851@yahoo.com <u>Notification</u>

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 Education Notypeation NoSO(B&A)/1-18/E&SE/2012 dated 11.07.2012 and rmance Department Endorsement No SO(FR)/FD/10-22(E)/2010 dated 16.07.2012, the following Male TTs B-15 are hereby promoted to the post of Senior TT BPS-16 (Rs.10000-800-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, indinessione under the rules on regular basis under the existing poincy of the Froometal Government, impleaching Cadre on the terms and condition given below with immediate effect and further they will be posted in the Government Higher Secondary /High Schools by the District Education Officers concerned against the newly upgraded Senior TT BPS-16 posts they will be posted by the District Education Officer concerned on "School based":-Total No of TT (M) p

	of Senior TT Posts	112
- Share of m	rumotion to a fl	37
- all dout	uule for Promotion	
(1 romotea)	to the post of Senior TT B-16	

S.No.	S.L. No.	Name of Teachers	Present Place of Posting	Date of Birth	Remarks	•
Terms of	37	Attaui Rehmon	GHS Kurmang	01-06-1973	Services placed at the disposal of DEO (M) Shungla for further posting school based	

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

They will be governed by such rules and regulations as may be issued from time to time by the Their services can be terminated at any time, in case his performance is jound unsatisfactory

during probationary period. In case of misconduct, he shall be preceded under the rules framed Charge report should be submitted in all concerned.

Their Inter-Sz- seniority on lower past will remain intact.

VolTA/DA is allowed for joining his duty.

They will give an under taking to be recorded in their service book to the effect that if any over Unjent is made to him in light this order will be recovered and if he is wrongly promoted he will

(Muhammad Rafiq Khattak)

Director

Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar. 12

File No.1/Promotion Senior TT B-16: Dated Peshawar the 0/ /14/2014.

Copy forwarded for information and necessary action to the: -

Accountant General Khyber Pakhtunkhwa Peshawar.

District Education Officers (M) Shangla

District Accounts Officer Shangla

Official Concerned.

PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department. PA to the Director E&SE Khyber Pakhtunkhua, Pestawar, M/File

Ghas getal -Fri Nelement ofter Fri Nelement M. Dy: Derector (Estab) Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

Attested

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pand reprint fills. DEC

CALITZ OFFICE OF TE DUCATION OFFICER (M) SHANGLA AT ALPURAI CONTACT NO. (0996) 850639. 851108- Fax # 851108 OFFICE ORDER. In pursuance of the Director E & SE KPK Peshawar, Notification No 5004-9/File No.2 promotion SSTs /(G)B-16; have been Promoted to the post of SST (G) noted against each in BPS 1 (Rs 18910-1520-64510) plus usual allowances as admissible under the rules and are hereby adjuste against the vacant posts as per letail mentioned below in the best interest of public service from the dat S. Present School # School where Remarks. 1 Muhammad Numan SST((posted SCT GHS Dandai 2 Muhammad Niaz GMS Piaz Maira SST(SCT GMS Bazarko 3 Sherin Zada A.V.P GMS Bar Batkot SST SCT GHS Fiaza Puran Muhammad Sadullah 4 A.V.P GHS Karin Dara SST(()) SCT GCMHS Alpural Gul Zada **GHS** Opal SSTIC PSHT GPS Danaku Abdul Jabbar **GHS** Danakul SST(C) SDM GHS Baina Atta Ur Rehman 7 **OHS** Enawar SST SKT GHS Kormang Muhammad Salcem 8 **GHS Kormang** SCT GHS Kass Lilowaal SSTIC Fazli Wadood e GMS Punyal SST(10 | Imdad Ullah SCT GHS Lilownai GMS Bazarkot SST(SAT GHS Murtung TERMS & CONDITION **GHS Murtung** They would be on Probation for a period of one year extendable for another one year. They will be governed by such rules and regulations as may be issued from time to time by the Govt. Their services can be tempnated at any time, in case their performance is found unsatisfactory durin probationary period. In case of misconduct. They shall be proceeded under the rules framed from time t Charge report should be submitted to all concerned. Their inter-se-seniority on lower post will remain intact. No TA/DA is allowed for joining their duties. They will give an under taking to be recorded in their service books to the effect that if any over paymer. is made to them in light this order will be recovered and if they are wrongly promoted they will b They will be governed by such rules and regulations as may be issued from time to time by the Govt. Before handing over charge once again their documents may be checked if they have not the required relevant qualification as per jules they may not be handed over charge of their posts. DISTRICT EDUCATION OFFICER (M) Endost: - No. DISTRICT SHANGLA Copy forwarded for information id Dated /2017. 1) PS to Secretary Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar. 2) The Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar. 3) This District Account Officer Shangla. 4) The Principal/Head Master Congerned 5) The District Monitoring Officer Shangla. 6) The District Nazim, Shangla. 7) The Local accountants. 8) The Teacher Concerned.

DISTRICT DUCATION OFFICE

AUTHORITY LETTER

As per Honorable Peshawar High court Mingora Bench/ Darul Qaza Swat requisite: Mr. Mian Asif Ali Shah Assistant District Education Officer (M) Shangla is hereby authorized to submit Joint Para wise Comments in Writ Petition No.775-M/20189 title Fazal Haqani Vs Government of Khyber Pakhtunkhwa & others on behalf of us.

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Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar (Respondent No.1)

Elementary and Person of Oderalian Control Histor Parallan

J. Ha

Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar (Respondent No.2)

Chencology Local and Postal And Chencology Local and Postal And Po

District Education Officer (M) District Shangla (Respondent No.3)

BEFORE THE PESHAWAR HIGH AT PESHAWAR

CHECK LIST

1.	Case Title Fazal Hagani VS Govt: of KP c Case is duly signed	Yes	
2.	The law under which the case is preferred has been	Yes	
3.	mentioned		
4.	Approved file Cover is used	Yes	
5.	Affidavit is duly attested and appended	Yes	
ó.	Case and annexures are properly paged and numbered according to index	Yes	
7.	Copies of annexures are legible and attested. If not, then better copies duly attested have been annexed	Yes	
8.	Certified copies of all the requisite documents have been filed	Yes	
9.	Certificate specifying that no case on similar grounds was earlier submitted in this court, filed	Yes	
10.	Case is within time	Yes	
11.	The value for the purpose of court fee and jurisdiction has been mentioned in the relevant column	Yes	
12.	Court fee in shape of stamp paper is affixed. (For writ Rs. 100 for other as required)	Yes	
13	Power for attorney is in proper form	Yes	
14.	Memo of attorney is in proper form	Yes	
15.	List of books menlioned in the petition.	Yes	
Ιó.	the requisite number of spare copies attached. (Writ Petition-3 Nos, Civil Appeal (SB-1, DB-2), Civil Revision (SB- 1,DB-2)	Yes	
17.	Case (Revision / Appeal / Petition etc) is filed on a prescribed torm	Yes	-
18.	Power of altorney is attested by jail authority (For jail prisoners only)		N

It is certified that formalities / documentation as required in column 2 to 18 above, have been fulfilled.

Name: Syed Saltanat Khan Advocate High Court

Signature

Date: FOR OFFICE USE ONLY

Case No.

Case received on

Comptete in all respect: Yes/No (if no, the grounds)

Date in Court:

Signature:

(Reader)

id: Deputy Regi

Daled:

Countersigned:

IN THE PESHAWAR OPENING SHEET FC	-		Dated of Filing:	
<u>OTENNO SHEEFT</u>			District	DISTRICT SWAT
Case Type: Writ Petition	Nature of C	Driginal Proceedi		
Original Order Forum Date	Review / Appel S.# Forum	late / Revision Date	Order Interlocutory	Bench Single Bench
			Final Order	Division Benc
				Full Court
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2. Petitioner (s) Coun	•	t Khan N	IIC: 15602 6	321507 7
Mobile No. 0346-9-			ingora, District Sw	al.
Address:3 rd Floor, C	Continental Plaza	, Makanbagh, M		
3. Respondents (s): G				Nil
	Sovt: of KP and of			
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BEFORE THE PESHAWAR HIGH COURT MINGORA BENCH AT SWAT

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W.P No. 775 / 2019

Fazal Haqani.

...Petitioner

- VERSUS -

Govt: of KP and others.

...Respondents

	INDEX		
5 #	Description of documents	Annexure	Pages
١.	Writ petition along with interim relief and list of books		1-5
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6.	Copy of appointment order	B	9-10
7.	Copies of notification dated 28-05-2013 and order dated 03-06-2013	C & D	11-13
8.	Copies of order dated 28-08-2017	E	14
9.	Copies of notification, appeal, order dated 30-03-2019 and order of respondent No. 2	F, G, H & I	15-26
10.	Court Fee		27
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12.	Wakalat Nama		29

PETITIONER THROUGH COUNSEL

SYED SALTANAT KHAN ADVOCATE HIGH COURT Office: 3rd Floor, Continental Plaza, Makanbagh, Mingora, District Swat.

Cell: 0346-9451026 Dated: **/5.**-06-2019

Re-filed Today 27 JUN 2019

Additional Registrar

ED TODAL JUN 2019 15

Acuitional Plansberge

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BEFORE THE PESHAWAR HIGH COURT MINGORA BENCH AT SWAT

W.P.No. 775 / 2019

Fazal Hagani S/o Fazal Mubin R/o Zara, Dherai, Tehsil Alpurai, District Shangla.

...Petitioner

- VERSUS-

- 1. Government of Khyber Pakhtunkhwa through Secretary of Elementary & Secondary Education at Civil Secretariat Peshawar.
- Elementary Secondary Education, 2. Director of & Government of Khyber Pakhtunkhwa at Peshawar.
- 3. District Education Officer (M)Shangla.
- 4. Secretary to Government of Khyber Pakhtunkhwa, Finance. Department at Peshawar.
- 5. Secretary to Government of Khyber Pakhtunkhwa, Establishment Department at Peshawar.
- 6. Accountant General of Khyber Pakhtunkhwa at Peshawar.
- 7. District Accountant Officer Shangla at Alpurai.
- 8. Attaur Rahman S/o Bahrul Uloom R/o Kormang, District Shangla.

...Respondents

Writ Petition UnderArticle 199 of the Constitution of Islamic Republic of Pakistan, 1973.

FILED TODA 15 Additional Ragistra

Respectfully Sheweth;

- 1. That petitioner is bonafide resident of Zara, Dherai, Tehsil Alpurai, District Shangla (Copy of NIC of petitioner is annexure A).
- 2. That vide letter No. 3356-34 dated 31-12-2004, the petitioner was appointed as Theology Teacher (TT) (Male) in Government Middle School Banr, District Shangla (Copy of appointment order is attached as annexure B).
- 3. That vide order Endst No. 3994-4000/File No.1/Promotion Senior TT B-16 Dated Peshawar the 28-05-2013, the petitioner was promoted against the post of Senior TT (BPS-16) at Government High School Dehrai, Alpurai, District Shangla, however, later on vide office order / adjustment Endost: No. 2804-10 dated 03-06-2013, the petitioner adjusted / transferred to the above said school in pursuance of the notification dated 28-05-2013 (Copies of notification dated 28-05-2013 and order dated 03-06-2013 are attached as annexure C & D).
- 4. That vide order Endost: No. 2938-42 dated 28-08-2017, the education department has promoted a junior one from STT to SST, despite the fact that pelitioner is senior, who is at serial No. 3 in the appointment order list, has been illegally dropped and respondent No. 8, who is at serial No. 17 in the above said appointment order list has been promoted from the post of Senior Theology Teacher (STT) to Secondary School Teacher (SST) (Copies of order dated 28-08-2017 is annexure E).

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That after getting knowledge of the above said impugned promotion / upgradation of respondent No. 8, and another notification Endst: No. 4681-86/File No.2/Promotion SST B-16 Dated Peshawar the 22-02-2019, wherein some posts of STTs were upgraded to SSTs, but again petitioner was illegally

and unlawfully dropped and one Muhammad Karim S/o Mohammad Hanif R/o Maira, District Shangla, who was at serial No. 6 in the appointment order list, was upgraded instead of petitioner, against which appeal was filed by petitioner, and the District Education Officer (M) Shangla / respondent No. 3 constituted a committee for recommendations, however after thorough inquiry of the committee constituted by respondent No. 3, the upgradation / promotion of Muhammad Karim was declared illegal, however the upgradation / promotion of respondent No. 8 remained undecided (Copies of notification, appeal, order dated 30-03-2019 of respondent No. 3 and order of respondent No. 2 are attached as annexure F, G, H & I respectively).

6. That petitioner for several times has orally requested the official respondents to prepare seniority list of petitioner, but the official respondents are clearly denying to prepare and handover the seniority list of petitioner.

7. That being aggrieved from inactions, discriminatory attitude of respondents, the petitioner has no other adequate and efficacious remedy, thus approached this august court inter alia on the following grounds.

GROUNDS:

i. That inaction and denial of the respondents to give promotion / upgradation to petitioner from STT to SST is illegal, unlawful and against the principles of law and justice.

ii. That under the terms of policy, the petilioner was entitled to promotion / upgradation in SST being senior from respondent No. 8.

That though the pelitioner stood at serial No. 3 with meril position 49.22 and respondent No. 8 at serial No. 17 with



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merit position 40.72 at initial appointment order list, but even then the official respondents have illegally and unlawfully upgraded / promoted the respondent No. 8 instead of petitioner being meritorious.

iv. That the appointing authority illegally and without preparing an authentic seniority list, has favoured respondent No. 8 and promoted / upgraded him to the posts SST, whereas the policy needs seniority cum fitness and as per rules and Civil Servant Act, 1973, no vested right to particular seniority is allowed, thus the official respondents have made clear discrimination with the petitioner.

 That according to the prevailing promotion policy of education department, 4% quota is reserved for promotion from STT to SST on seniority cum fitness base, but even then petitioner has not been promoted.

vi. That fundamental rights of the petitioner has been violated by the respondents.

vii. That promotions / upgradations of private respondents are in clear violation of established rules, law and policy and the petitioners is enlitled to be considered as SST.

viii. That respondents have no power and authority to deprive the petitioner from his accrued right of upgradation / promotion.

FILED TODAN 15 JUN 2019 X. Additional Register

ix. That the education department for their ulterior motives has consciously omitted discrimination with the petitioner.

That the education department / official respondents without adopting proper procedure have filled the SST posts without considering the petitioner.

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That respondents are not authorized to deny the

preparation of seniority list.

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xii. Any other grounds not specifically raised will be argued with prior permission of this august court.

It is therefore very humbly prayed that, on acceptance of the instant writ petition;

- Inoction and denial of respondents from promotion / upgradation of petitioner, may please be declared null and void.
- Office Order Endost: No. 2938-42 dated 28-08-2017, may please be rectified and modified to the extent of giving promotion / upgradation to the petitioner.
- iii. The petitioner may please be declared to be entitle to promotion / upgradation from STT to SST.
- iv. The respondents may please be directed to promote / upgrade the petitioner from STT to SST with all back benefits.

v. Any other relief not specifically prayed but this august court deems proper may also be granted.

Petitioner Through Counsel

Syed Saltanat Khan Advocate High Court Dated: 15 -06-2019

Interim Relief:

By way of interim relief the respondents may please be restrained from taking any adverse action against the petitioner, till disposal of the captioned writ petition.

Syed Salfanat Khan Advocate High Court

List of Books:

Constitution of Islamic Republic of Pakistan 1973.
 Civil Servant Act, 1973
 FILED TODA) Case law according to need.

Syed Saltanat Khan

Advocate High Court

Additional Registrar

15 JUN 2019

BEFORE THE PESHAWAR HIGH COURT MINGORA BENCH AT SWAT

W.P.No. 23- 1 / 2019

Fazal Haqani.

...Petitioner

..Respondents

- VERSUS -

Govt: of KP and others.

<u>Certificate</u>

It is certified that as per instruction received from my client that no such like other writ petition has been earlier filed before this august Court.

> Petitioner Through Counsel

Syed Salfanat K

Advocate High Court

FILED TODAY 15 JUIN 2019

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BEFORE THE PESHAWAR HIGH COURT MINGORA BENCH AT SWAT

W.P No. 7 _ / 2019

Fazal Haqani.

...Petitioner

- VERSUS -

Govt: of KP and others.

...Respondents

<u>Affidavit</u>

I, Fazal Haqani S/o Fazal Mubin R/o Zara, Dherai, Tehsil Alpurai, District Shangla, do hereby solemnly affirm and declares, all the contents of this writ petition are true and correct to the best of my knowledge and belief and nothing has been kept concealed therein from this august court.

Deponent: Fazal Hagani (Petitioner In Person) FILED TODAL .15 JUN/2019 **Additional Registrar** S.No. Certified that the above was vertiged on Solemn day, affirmation before me on this of Lune 20 Dy. _.R/c who mebs.en Slō. was identified by. ly known to me. Who la ADDL: REGISTRAR Peshawer High Court Mingora Bench/Dar-ul-Ciza, Swat. 5501-6 50679

BENCH AT SWAT

W.P No. 775- / 2019

Fazal Haqani.

...Petitioner

- VERSUS -

Govt: of KP and others.

...Respondents

Memo of Addresses

Addresses of Petitioner:

Fazal Haqani S/o Fazal Mubin R/o Zara, Dherai, Tehsil Alpurai, District Shangla.

CNIC No: 15501-6150679-1 Cell No: 0344-9603454

Addresses of Respondents:

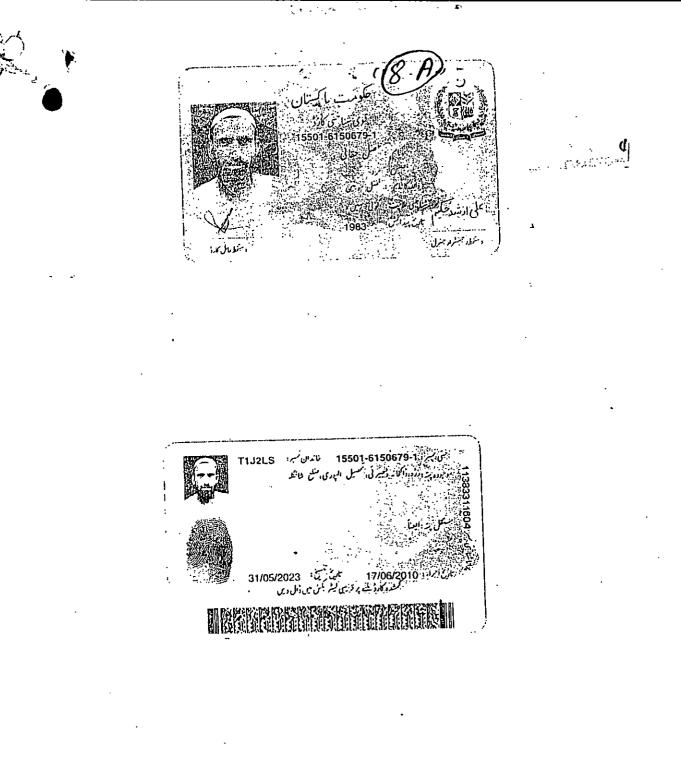
- Government of Khyber Pakhtunkhwa through Secretary of Elementary & Secondary Education at Civil Secretariat Peshawar.
- 2. Director of Elementary & Secondary Education, Government of Khyber Pakhtunkhwa at Peshawar.
- 3. District Education Officer (M)Shangla.
- 4. Secretary to Government of Khyber Pakhtunkhwa, Finance Department at Peshawar.
- 5. Secretary to Government of Khyber Pakhtunkhwa, Establishment Department at Peshawar.
- 6. Accountant General of Khyber Pakhtunkhwa at Peshawar.
- 7. District Accountant Officer Shangla at Alpurai.
- 8. Attaur Rahman S/o Bahrul Uloom R/o Kormang, District Shangla.

FALSO TODAL JUN 2019

Petitioner Through Counsel

Advocate High Court

Additional Registrar



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NUCECOORDE NOFFICER DISTRICT SHANGLA.

Office order / Appointment,

Consequent upon the approval by the District Selection Board Shangla in its meeting held on 31/12/2004, the District Coordination Officer (Chairman DSB) District Shangla has been pleased to appoint the following candidates as $\frac{11 - 4Male}{1000}$ Contract / Permanent (in case of alread) in-service) in BPS-07 (Rs.2220-120-5820) with usual allowances in schools noted against each from the date of taking over charge in the interest of public service.

				······		·	• •	•
		S.#	Name of Candidate	Resident	:2	Merit Positio		ed Nature of Eligibility/
	Q	ريم	Khalilullah S/O Abdul Khaliq	Lilownai	·			Remarks
	l Y	1	Badshah Zamin S/O Mohd Yam	in Lilovnai		642	in the second second	Open Merit
	1	7 3	Fazar Hagani S/O Fazar Mubio	Zara		611		Open Merit
	H	4	riakimullah S/O Rahat Gul	Bengalai	``¦`	- 49 2		Open Merit
1			Jan-Rahman S/O Imraliston	Sangrai		46,56		Open Merit
		15	Mohd Karim S/O Mohd Hand	Maira	····	45.30		Open Merit C
1			Hisamuddin S/O Mobd Amin	the second secon		44.82	GHS Dandai	
ţ	ļ	<u>8</u>	Abdul Malik S/O Ziaul Han	Godar Bande	<u>}</u>	44.77	GHS Shikawlai	Open Merit
		<u>s</u> – [Mond Habib S/O Mohrl Rahman	Bengalai		44.70	GHS Gharai Kandaw	Open Merit
	1		Noorullah S/O habiburahman	Machkander	<u> </u>	44.43	GMS Enawar	
		11	Shafiq Ahmad S/O Gul Mohd	Chagum (P)		44.22	GHS Gharai Kandaw	Open Merit
		12 1	hsanullah S/O Mohd Ghufran	Lilownai		43.74	GMS Larai (Lilownai)	Open Merit
	1	3 1	Noor Mohd S/O Mohd Ghayas	Alpurai		43.63	GMS Gandaw	Open Merit
	1	4 F	azal Akbar S/O Yosaf Khan	· Kolalai	·	43:55		Open Merit
	.1	5 5	amiul Hag Sto Fosal Khan	Maira		41.87	GHSS Chawga	Open Merit
	1	6 . A	amiul Haq S/O Falhul Uloom bdullah S/O Amir Sultan	Sundovi		41.32	GMS Kuz Balkor	Open Merit
Ľ.	15	P A	taur Pahmas Qio a	Shikawlai			GHS Puran	Open Merit
ŀ	18		taur Rahman S/O Bahrul Uloom	Kormang	;	41 31	GMS Kadona	Open Merit
İ	19		bdul Hadi S/O Abdul Qadeem	Ajmiar	···/	40.72	GMS Kormang	Open Merit
	1 20		ushtaq Ahamd S/O Mohd Sidiq	Ajmiar		40.14	GMS Chichlo	Open Meril
ς.	21	-	halid Khan S/O-Jalandar Khan	Enawar		39.93	GMS Sundia	Open Merit
r E	22		ayalul Həq S/O Fazal Rabbi	Sundovi		39.83	GMS Dunkacha	Open Merit
	23		orul Amin S/O Bahroz Khan	Lilownai		39.64	GHSS Sundovi	Open Merit
	24	1 AU	dus Shakoor S/O Bahrul Uloom	Sundovi	_	39.51	GMS Shangla	Open Merit
	25	100	wat Khan S/O Subbary	Chakisar	_	39.22	GMS Drad	Open Merit
. !	26	Na	hmatullah S/O Said Abas	Karora		35.29	GMS Katkore	Open Merit
•	27	Mai	zir Khan S/O Umar Zarin	Maira	-	37.76 (GMS Danakool	Open Merit
·i	28		hd Rahman S/O Fazal Karim	K. Kana		7,41 (SMS Dawcot	Open Merit
İ	29	[Il Hag S/O Sirjul Hag	Dankool		7 03 0	SHSS Butyal	Open Merit
÷ĺ	30.	All /	Abbas S/O Hakim Khan	Alpurai			SHS Amnovi	Open Merit
ľ	· · · · · · · · · · · · · · · · · · ·	<u>-nna</u>	lid Ahmad S/O Abdul Qayoom	Lilownai	1	6.64 0	MS Chakal	Open Merit
ŀ	31		mat Khan S/O Mukaram Khan	Bengalai			MS Managay	Open Merit
ŗ	32	Suel	r Arzal S/O Khali Rokhan	Khadang			MS Dedat	Open Merit
į_	33	вакі	IL Mand Zeb S/O Musalar	Pagorai		5 13 G	MS Khadang	Open Ment
	34	Zain	ul Abidin S/O Mohd Samiullah	Damorai		5.85 <u>G</u>	MS Pir Abad	Open Merit
;		Sual	uddin S/O Mohd Sadio	Puran		<u>39 G</u>	US Dunkacha	Open Merit
i I	36	Sarta	j S/O Abdul Ghafoor			<u>38 G</u>	IS Dahar D	Open Merit
,	Ter	ins S	Conditions: -	Shahtoot Kana		26 GI	AS Shahland	
- 7								Open Merit

Sales II. .

1) The Appointment is purely on contract basis against BPS-09 plus usual allowances as admissible.

under the rules except the candidates already in service. 2) The initial period of appointment shall be three years, after which the contract will be renewed. or otherwise by the appointing authority keeping in view the performance of the concerned in

3) The appointment of the above candidates subject to the verification of their domicile/academic documents etc: from the concerned authority

4) The service of the above candidates will be liable to termination at any time without assigning any prior notice / reason. In case of seeking resignation without prior notice, by any teacher, one pionth pay and allowances if any shall be forfeited to Govi, treasury,

5) The candidates should join their posts with in fifteen days of the issue of their orders except the appointees in those schools where winter viention is running. In such arras the appointees

OFFICE OF THE DISTRICT COORDINATION OFFICER DISTRICT

ffice order / Appointment.

Consequent upon the approval by the District Selection Board Shangla in its meeting held on 31/12/2004, the District Coordination Officer (Chairman DSB) District Shangla has been pleased to appoint the following candidates as TT. (Male) Contract / Permanent (in case of already in-service) in BPS-07 (Rs.2220-120-5820) with usual allowances in schools noted against each from the date of taking over charge in the interest of public service.

S.#	Name of Candidate	Residence	Merit Position	School Where Posted	Nature of Eligibility/ Remarks
1	Khalilullah S/O Abdul Khalig	Lilownai	64.28	GCMHS Alurai	Open Merit
. 2	Badshah Zamin S/O Mohd Yamin	Lilownai	61.19	GHS Lilownai	Open Merit
3	Fazal Haqani S/O Fazal Mubin	Zara	49.22	GMS Banr	Open Merit
4	Hakimullah S/O Rahat Gul	Bengalai	46.56	GHS Puran	Open Merit
5	Jan Rahman S/O Imralistan	Sangrai	46.33	GMS Sangrai	Open Merit
6	Mohd Karim S/O Mohd Hanif	iðaira 👘	44.82	GHS Dandai	Open Merit
7	Hisamuddin S/O Mohd Amin	Godar Banda	44.77	GHS Shikawlai	Open Merit
8	Abdul Malik S/O Ziaul Haq	Bengalai	44.70	GHS Gharai Kandaw	Open Merit
9	Mohd Habib S/O Mohd Rahman	Machkandai	44.43	GMS Enawar	Open Merit
10	Noorullah S/O habiburahman	Chagum (P)	44.22	GHS Gharai Kandaw	Open Merit
11	Shafiq Ahmad S/O Gul Mohd	Lilownal	43.74	GMS Larai (Lilownai)	Open Merit
12	Ihsanullah S/O Mohd Ghulran	Alpurai	43.63	GMS Gandaw	Open Merit
13	Noor Mohd S/O Mohd Ghayas	Kolalal	43.55	GHSS Chawga	Open Merit
14	Fazal Akbar S/O Yosaf Khan	Maira	41.87	GMS Kuz Balkor	Open Merit
15	Samiul Hag S/O Fathul Uloom	Sundovi	41.32	GHS Puran	Open Merit
16	Abdullah S/O Amir Sultan	Shikawlai	41.31	GMS Kadona	Open Merit
17	Ataur Rahman S/O Bahrul Uloom	Kormang	40.72	GMS Kormang	Open Merit
18	Abdul Hadi S/O Abdul Qadeem	Ajmiar	40.14	GMS Chichlo	Open Merit
19	Mushtaq Ahamd S/O Mohd Sidiq	Ajmiar	39.93	GMS Sundia	Open Merit
20	Khalid Khan S/O Jalandar Khan	Enawar	39.83	GMS Dunkacha	Open Merit
21	Inayatul Haq S/O Fazal Rabbi	Sundovi	39.64	GHSS Sundovi	Open Merit
22	Noorul Amin S/O Bahroz Khan	Lilownai	39.51	GMS Shangla	Open Merit
23	Abdus Shakoor S/O Bahrul Uloom	Sundovi	39.22	GMS Drad	Open Merit
24	Dawlat Khan S/O Subhani	Chakisar	38.29	GMS Katkore	Open Merit
25	Rahmatullah S/O Said Abas	Karora	37.76	GMS Danakool	Open Merit
26	Nazir Khan S/O Umar Zarin	Maira	37.41	GMS Dawoot	Open Merit
27	Mohd Rahman S/O Fazal Karim	K. Kana	37.03	GHSS Butyal	Open Merit
28	Ziaul Haq S/O Sirjul Haq	Dankool	36.86	GHS Amnovi	Open Merit
29	Ali Abbas S/O Hakim Khan	Alpurai	36.64	GMS Chakat	Open Merit
30	Khalid Ahmad S/O Abdul Qayoom	Lilownai	36.61	GMS Managay	Open Merit
31	Kiramat Khan S/O Mukaram Khan	Bengalai	36.22	GMS Dedal	Open Merit
32	Sher Afzal S/O Khali Rokhan	Khadang	36.13	GMS Khadang	Open Merit
33	Bakht Mand Zeb S/O Musafar	Pagorai	35.85	GMS Pir Abad	Open Merit
34	Zainul Abidin S/O Mohd Samiullah	Damorai	35.39	t	Open Merit
35	Sirajuddin S/O Mohd Sadiq	Puran	35.38	GHS Dehrai Puran	Open Merit
36	Sartaj S/O Abdut Ghafoor	Shahtool Kana	35.26	GMS Shahtoot	Open Merit

Terms & Conditions: -

 The Appointment is purely on contract basis against BPS-09 plus usual allowances as admissible under the rules except the candidates already in service.

2) The initial period of appointment shall be three years, after which the contract will be renewed or otherwise by the appointing authority keeping in view the performance of the concerned in starse of fresh candidates.

Asset: District Show prior notice / reason. In case of seeking regionation with any time without assigning

Attested by nonth pay and allowances if any shall be forfeited to Govt. treasury.

(10) The candidates should join their posts with in fifteen days of the issue of their orders except the appointees in those schools where winter vacation is running. In such areas the appointees will **Syed** Fitanat **Khasi** we charge from 01/03/2005. Failing which their appointment will be automatically treated Advocate High Gourdcelled.

0346-945(1026he fresh candidates will not be handed over charge if the

138 or below 18 years.

. ? . 7) The appointment is subject to the production of health & age certificate from the medical Superintendent concerned in case of fresh appointment. 8) The concerned drawing disbursing officer should check their original Certificates / domicile efe before handing over charge and attested copies of the agreement signed on both the sides be furnished for record. 9) No TA/DA is allowed being fresh appointment and Charge report should be submitted in duplicate to all concerned. (0) The candidate will be governed by the terms and conditions of service mentioned in agreement enforced under the rules. 11) They will not claim seniority in case of appointment on contract base. 12) The fresh appointees will liable to be transferred/replaced by senior teachers working in far flung 13) If documents of Academic Qualification / Sanad etc of any one were found bogus OR any Madrasa was found unrecognized by the Education Department in a result of re-verification / inquiry, appointment of such persons will be treated as cancelled automatically. (SHER BAHAD X KHAN) DISTRICT COORDINATION OFFICER / CHAIRMAN DSB DISTRICT SHANGLA Dated 3/1/2/2004. Endost: No. 3356-34 Copy to: -1) The secretary Schools & Literacy Department N.W.F.P, Peshawar. 2) The Director Schools & Literacy N.W.F.P. Peshawar. 3). The EDO Schools & Literacy Shangla. 4) The District Accounts Officer Shangla. 5) The Principal / H/M GHSS / GHS / GMS / Concerned. The Candidates concerned. 6) DISTRICT COORDINATION OFFICER / Andsted by CHAIRMAN DSB DISTRICT SHANGL Sver Sulkanat Khan Advacate Buh Court 6848-6954826 c7) Executive District Officer Schools & Liter. cy District Shangk:

: appointment is subject to the production of health & age certificate from the medical intendent concerned in case of fresh appointment. The concerned drawing disbursing officer should check their original Certificates / domicile.etc before handing over charge and attested copies of the agreement signed on both the sides be furnished for record. 9) No TA/DA is allowed being fresh appointment and Charge report should be submitted in duplicate to all concerned. 10) The candidate will be governed by the terms and conditions of service mentioned in agreement enforced under the rules. 11) They will not claim seniority in case of appointment on contract base. 12) The fresh appointees will liable to be transferred/replaced by senior teachers working in far flung 家都有些 13) If documents of Academic Qualification / Sanad etc of any one were found bogus OR any areas. Madrasa was found unrecognized by the Education Department in a result of re verification / ; inquiry, appointment of such persons will be treated as cancelled automatically. (SHER BAHAD XR KHAN) DISTRICT COORDINATION OFFICER / CHAIRMAN DSB DISTRICT SHANGLA Dated 3/1/2/2004. Endost: No Copy 10: -1) The secretary Schools & Literacy Department N.W.F.P. Peshawar. 2) The Director Schools & Literacy N.W.F.P. Peshawar. 3) The EDO Schools & Literacy Shangla. 4) The District Accounts Officer Shangla. 5) The Principal / H/M GHSS / GHS / GMS / Concerned. 6) The Candidates concerned. DISTRICT COORDINATION OFFICER / CHAIRMAN DSB DISTRICT SHANGLA 2000 Executive District Officer Schools & Lineser District Shangla

TTs (M) Shangla 11 1

Annexore «())



Elementary and Secondary Education imectorate o Khyber Pakhtunkhwa Peshawar PH No. 091-9210359, 9210938, 9210437,9210957, 9210468 Fax 091-9210936,0800-33857 E-mail rafiq_kk851@yahoo.com

Notification

Consequent upon the recommendations of the Departmental Promotion CommiTT ee 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(IR)/FD/10-22(E)/2010 dated 16.07.2012 , the following Male TT $\,$ s B-15 are hereby promoted to the post of Senior TT UPS-16 (Rs.10000-800-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and further they will be posted in the Government Higher Secondary /High Schools by the District Education Officers concerned against the newly upgraded Senior TT BPS-16 posts:-.

	· · · · · · · · · · · · · · · · · · ·
Kkkk Total No. of TT (M) Posts duly verified by	112
A = DAO	37
1/3 share of Senior TT Posts Share of promotion 100 %	37
Already promoted as STT B-16	31
Posts available for promotion	06
Promoted as STT B-16	05
Deferred for promotion	A.

				Date of	Remarks
S.#	5.11	Name With	Place Of Duty	Birth	Convices placed at th
	48	Abdullah TT	GHS Shikawlai	20/05/1974	disposal of DDO (8) Shangla for firth posting,
		Shafiq Ahmad TY	GMS Larai Lilounai	26/05/1977	Do
2	60	the second second second second second second second second second second second second second second second s	GMS Enmour	10/04/1980	·
3	69	Khalid Khan TT	GMS Entitlet		
		Muhammad Yaqoub	GHS Ranyal	01/03/1981	<i>Do</i> .
4	71	<u>TT</u>	GHS Dehrai Alpurai	18/03/1983	Do
.5	71	Fazal Flagani TT	GHS Denral Alparta		

Terms and conditions:-.

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

- They will be governed by such rules and regulations as may be issued from time to time by 22
- Their services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be preceded under the rules 3
- framed from time to time. Charge report should be submit ed to all concerned.
 - Their Inter-Se- seniority on lower post will remain intact:
- 5 6
- They will give an under taking to be recorded in their service book to the effect that if any No TA/DA is allowed for joining his duty. over payment is made to him in light this order will be recovered and if he is wrongly 7
- promoted he will be reversed.

(Muhammad Rafiq Khattak)

Director Elementary and Secondary Education

Khyber Pakhtunkhwa Peshawar.

Shangla II TTs (M) Endst: Np. / File No.1/Promotion Senior TT B-16: Dated Peshawar the 28/08/2013.
Endst: Np. / File No.1/Promotion Senior TT B-16: Dated Peshawar the 28/08/2013.
Copy forwarded for information and necessary action to the: Copy forwarded for information and necessary action to the: Copy forwarded for information and necessary action to the: Copy forwarded for information and necessary action to the: Copy forwarded for information and necessary action to the: Copy forwarded for information and necessary action to the: Copy forwarded for information and necessary action to the: Copy forwarded for information and necessary action to the: Copy forwarded for information and necessary action to the: Copy forwarded for information and necessary action to the: Copy forwarded for information and necessary action to the: Copy forwarded for information and necessary action to the: Copy forwarded for information and necessary action to the: Copy forwarded for information and necessary action to the: Copy forwarded for information and necessary action to the information and necessary action to the information and necessary action to the information and necessary action to the information and necessary action to the information and necessary action to the information and necessary action to the information and necessary action to the information and necessary action to the information and necessary action to the information and necessary action to the information and necessary action to the information and necessary action to the information and necessary action to the information action to the information action to the information action to the information action to the information action to the information action to the information action to the information action to the information action to the information action 94j-4000 2815 7. M/File **Dy: Director (Estab)** Elementary and Secondary Education Khyber Pakhtunkhwa Peshaway

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Annexore c D11



OFFICE OF THE DISTRICT EDUCATION OFFICER DISTRICT SHANCLA. CONTACT NO. (0996) 850639. 851108- Fax # 851108

OFFICE ORDER / ADJUSTMENT

Consequent upon the promotion/up gradation of TTs (M) to BPS-16 vide notification No. 3994-4000/File No.1/Promotion Senior TT B-16: Dated Peshawar the 28/05/2013 issued by the Director, E&SE, Khyber Pakhtunkhwa, Peshawar and the resultant of Promotion of TTs from Middle Schools as well as Up gradation of TT Posts in Higher/ High Schools in the District, the following TTs (M) BPS-16 and BPS-15 are hereby transferred / adjusted in their own pay / scale and schools all mentioned against their " names each in the best interest of public service with effect from 29/05/2013.

S,#	NAME OF TEACHER 6	BPS	FROM	то	REMARKS
	Abdullah Ti	16	GHS Kulalai	GHS Baina	i Up graded post
2	Shaliq Ahmad TT	16	GMS Larai Lilownai	GCMHS Alpura	Up graded post
3	Khalid Khan TT	16	GHS Enawar	GHSS Chawga	Up graded post
4	Muhammad Yaqhoob TI	1E	GMS Sangrai	GHS Kormang	un graded post
5	Fazal Hagani 11	16	GHS Dhenai (A)	GRS Oberai (A)	up graded post
6	Wagar Ahmad TT	15	GEMHS Alpurai	GMS Larai	Against serial # 2
7	Attarur Rahman 11	1 15	GHT Chruster	uMS Sengral	Against serial # 4
8	Jan Feroz TT	15	GHSL Chawga	GMS Enawar	Against serial # 3
9	Falzli Wadood	15	GUS Baina	GMS Xidalai	Ageinst serial # 1

TERMS AND CONDITION:

- 1. They would be on probation for a period of one year extendable for another one year
- 2. They would be governed by such roles and regulations as may be issued from time to time, by the Covt.
- Their services can be terminated at any time in case his partermance is found unsatisfactory during probationary partial in case of miss conduct, he shall be proceeded under the rules framed from time to time.
- 4. Charge rept. I should be submitted to all concerned.
- 5. Their inter-se-seniority on lower post will remain intert.
- 6. No TA/DA is allowed for joining his duty.
- 7. They will give an under taking to this effect to be recorded in their service book to the effect that if any overpayment is made to bim in light this order will be recovered and if he is wrongly promoted he will be reversed.

(MUHAMMAC JAYED) District Education Officer (MZF) District Shangla

ENDOST:- NO. 2804 - 10 IDATED 3 106/2013.

Copy of the above is forwarded for information and necessary action to:-

- 1. PS to Secretary Education Department Khyber Pakhtunkhwa.
- 2. PA to Director Education Department Khyber Pakhtunkhwa, Peshawar.
- 3. District Account Officer Shangla.
- 4. The DEO (M) Shangla.
- 5. The Principals/ Headmasters Concerned.
- 6. DEMIS Cell Shangla.
- 7. The Teachers Concerned.
- 8. Personal file.

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OFFICE OF THE DISTRICT EDUCATION OFFICER (M) SHANGLA

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CONTACT NO. (0996) 850639. 851108- Fax # 851108

OFFICE ORDER.

In pursuance of the Director E & SE KPK Peshawar, Notification No 5004-9/File No.: promotion SSTs /(G)B-16; have been Promoted to the post of SST (G) noted against each in BPS 1 (Rs 18910-1520-64510) plus usual allowances as admissible under the rules and are hereby adjuste against the vacant posts as per detail mentioned below in the best interest of public service from the dat of their taking his over charge

S. #	Name	Post	Present School	School where posted	Remarks.
1	Muhammad Numan	SST(G)	SCT GHS Dandai	GMS Piaz Maira	A.V.P
2	Muhammad Niaz	SST(()	SCT GMS Bazarko	GMS Bar Batkot	A.V.P
3	Sherin Zada	SST(6)	SCT GHS Fiaza Puran	GHS Karin Dara	
4	Muhammad Sadullah	SST(())	SCT GCMHS Alpurai	GHS Opal	· · · · · · · · · · · · · · · · · · ·
5	Gul Zada	SST(()	PSHT GPS Danaku	GHS Danakul	
6	Abdul Jabbar	SST(())	SDM GHS Baina	GHS Enawar	
7	Atta Ur Rehman	SST(C)	STAT GHS Kormang	GHS Kormang	i
8	Muhammad Saleem	SST(())	SCT GHS Kass Lildwaai	GMS Punyal	·
9	Fazli Wadood	SST(()	SCT GHS Lilownai	GMS Bazarkot	· · · · ·
10	•Imdad Ullah	SST(SAT GHS Murtung	GHS Murtung	······

- They would be on Probation for a period of one year extendable for another one year,
- They will be governed by such rules and regulations as may be issued from time to time by the Govt. Their services can be terminated at any time, in case their performance is found unsatisfactory durin probationary period. In case of misconduct, They shall be proceeded under the rules framed from time t time.
- Charge report should be submitted to all concerned.
- Their inter-se-seniority of lower post will remain intact.
- No TA/DA is allowed for joining their duties.
- They will give an under taking to be recorded in their service books to the effect that if any over paymer is made to them in light this order will be recovered and if they are wrongly promoted they will b reversed.
- They will be governed by such rules and regulations as may be issued from time to time by the Govt. Before handing over charge once again their documents may be checked if they have not the required relevant qualification as per rules they may not be handed over charge of their posts.

Copy forwarded for information to

- D
- PS to Secretary Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar. The Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar. 2)
- The District Account Officer Shangla. 3)
- 4)
- The Principal/Head Master Conderned
- The District-Monitoring Officer, Shangla. 5)
- The District Nazim, Shangla. 6)
- The Local accountants. 7)

Endost: - No.

The Teacher Concerned.

TION OFFICER (M)

/2017.

A sugar Be

SHANGLA

DESTRICT / DUCATION OFFIC DÍSTRICT SHANGLA

Annexore ciFn

1)

SSTs (M) Shongla Directorate of Elementary and Secondary Education

<u>Notification</u>

Consequent upon the recommendations of the Departmental Promotion Committee and in parsnance of the Government of Rhyber Pakhtunkhova Elementary and Scondary Education Notification NoSO(PE)/4-5/SSKC/Meeting/2013/Teaching Cailre dated ed July2014. the following SCTs/CTs, SDMs/DMs, SATs/ATs, STTs/TTs, Senior Quarts/Quarts, PSHTE/SPSTs/PSTs are hereby promoted to the post of SST (Bio-Chem), SST PhysMathes, SST (General) noted against each RPS-16 (Rs. 18910-1520-64510) plus usual allowences as admissible under the rules on resultar basis under the existing policy of the Proceeded Government, on the terms and condition given below with immediate effect and parties then will be posted, by the District Education Officer concerned.

Barris Const

<u>A.SST (Bio/Chem)</u>

	r -
PROMOTION OF PSHT/SPST/PST TO SST (Rio/Chem) BPS-14) .
PROMOTION OF TSHITMSTATISTICS	04
Total No. of SST Bio/Chem (M) Posts vacant Posts	
25% share initial recruitment	03
"5" share for Promotion.	
20 % Share of promotion of PSH1/SPS1/PST	01
20 % Shore of primotion of 1 Strift Oly 19-	1 11
Posts available for promotion	
	01
Proposed for Promotion	01
- Recommended for promotion	
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SNo : S.U. Na		Date of Birth	Daix of Appolt:	Qualifica tion	Remarks
	Present Piace of Posting	۰ ·	as Regular PST		
3) 1	Ellar e Sanaa GPS (Gama	377 1585	14-2013	05c/8 Ed 	Services planed at the disposal of DEO (M) Shangla for further oosting Lagainst SST (Bio/Chem) past.

A. SST (Phy-Maths)

1. PROMOTION OF PSHT/SPST/PST TO SST (Phy-Maths) BPS-	<u>·16.</u>
Fotal No. of SST Phy-Maths (34) Posts vacant Posts	0.4
25% share initial recruitment	01
75% share for Promotion.	03
20 % Share of promotion of PSHT/SPST/PST	-01
Posts available for promotion	01
Proposed for Promotitm	01
Recommended for promotion	01

SS.I. (Ni	ane of $\pm D$	ate of	Date of	Qualifica	Remarks
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	su Colora Decemp	a togʻi	- 100 Norr 1		Services placed at the disposal of DEO (M) Stangla for further posting against SST
	<u></u>)	: -h	(Phy-Moths) post
B. <u>SST (</u>	<u>Genera</u>	\underline{D}			
<u>1. PROMO</u>	TION OF S	CT/CI	TO SST	(General) BPS-16
Total No.	of vacant	Posts	of SST IC	eneral)	
25% share					17
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SSTs (M) Shangla Directorate of Elementary and Secondary Education

Better OPS page No. 15



Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification NoSO(PE)/4-5/SSRC/Meeting/2013/Teaching Cadre dated 24^{th} July.2014. the following SCTs/CTs, SDMs/DMs, SATs/ATs, STTs/TTs, Senior Qaris/Qaris, PSHTs/SPST's/PSTs are hereby promoted to the post of SST (Bio-Chem),SST (Phy-Maths), SST (General) noted against each BPS-16 (Rs. 18910-1529-64510) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and further they will be posted by the District Education Officer concerned.

- determine .

A.SST (Bio/Chem)

1. PROMOTION OF PSHI/SPST/PST TO SST (Bio/Chem) BPS	<u>5-16.</u>
Total No. of SST Bio/Chem (M) Posts vacant Posts	04
25% share initial recruitment	01
75% share for Promotion.	03
20 % Share of promotion of PSHT/SPST/PST	01
Posts available for promotion	01
Proposed for Pramotion	01
Recommended for promotion	01

SNO	S.L. No	Name of Official & Present	Date of Birth	Date of Appott: us	Qualifica tion	Remarks
!		Place of Pasting		Regular PST		
	80	Bakht Jamal GPS Brain	3/2/1985	1/11/2011	BSc/B.Ed	Services placed at the disposal of DEO (M) Shangla for further posting against SST (Bio/Chem) post.

A. <u>SST (Phy-Maths)</u>

 1. PROMOTION OF PSHT/SPST/PST TO SST (Phy-Maths) BPS-16.

 Total No. of SST Phy-Maths (M) Posts vacant Posts
 04

 25% share initial recruitment
 01

 75% share for Promotion.
 02

73/0 5/12/ 0/17/10/10/10/1	0.3
20 % Share of promotion of PSHT/SPST/PST	01
Posts available for promotion	10
Proposed for Promotion Recommended for promotion	10
(Arcommented for promotion	01

S. No	S.L No	Name of Official & Present Place of	Date of Birth	Date of Appott: as Regular PST	Qualifica Ilan	Remarks	Ļ
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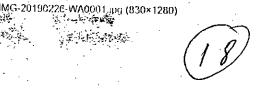
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- charge report should be submitted to our concerned
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(Hafiz Dr. Muhammad Ibrahim) Director Elementary and Secondary Education

Klupher Pakhtaukhwa Peshuwar

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- 2. District Education Officer (M) Shangla.
- 3. District Accounts Officer Shangla
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- 3. PS to the Secretary to Gove: Khaber Pakhtankhuoa E&SE Department.
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- Charge report should be submitted to all concerned.
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- They will give an under taking to be recorded in their service book to the effect that if any over payment is made to him in light this order will be recovered and if he/she is wrongly promoted he/She will be reversed.
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(Hafiz Dr. Muhammad Ibrahim)

Director Elementary and Secondary Education Kligher Pakhumkhwa Peshawar

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- 2. District Education Officer (M) Shangla.
- District Accounts Officer Shangla. 3.
- Official Concerned.
- PS to the Secretary to Goot: Khyber Pakhtunkhoa E&SE Department. 5.
- 6. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
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PROMOTION OF STT/TT TO SST (General) IIPS-

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1	35	Muhammad Karm GHS Manen (Mah aj	1/0/1073	371 2005	MA/B.Ed.	Services placed at the disposal of DEO (M) Shangla for furthe posting against SST (General post,
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Terms and conditions:-.

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- They would be an probation for a period of one year extendable for another one year. 2
- They will be governed by such rules and regulations as may be issued from time to time by the Gout. 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 preceded under the rules framed from time to time.

(-20) Mn-بحضور جناب ڈائیر یکٹرصاحب محکمہ ابتد کی و ثانو ی تعلیم ،ایلیمنٹر ی اینڈ سینڈری ایجو کیشن خیبر پختون خواہ پڑ جنات عالى ! a the second as گزارش ہے ہے کہ سائیل محکمہ تعلیم میں 31/12/2004 سے ازرو ارڈرنبر:34-3356 مورجہ 31/12/2004 بحیثیت معلم دینیات متعین رہا۔ مذکورہ بالاعظم نامہ میں میرانا م سیریل نمبر 3 پر درج ہے جناب والا! اكتوبر 2017 ميں SST پر موثن كى بابت ، تحجيح لاعلم ركھا كيا اور عطا الرحمن جو STT مير ٹ ميں مجھ سے پیچے سیریل نمبر 17 پرواقع ہے اُسے SST پوسٹ پرتر تی دی گٹی اور تجھے نظر انداز کیا گیا۔ ج**ناب والا!** حال ہی میں یعنی جنوری 2019 میں SST پوسٹ پرتر تی سے سلسلے میں ایک بار پر مجھے نظرانداز رکا گیا۔ سینارٹی میں مُجھر سے پیچھے حکہ کریم کواولیت دی گئی ہے جو کہ تقرر منامہ میں سیریل نمبر 6 واقع ہے جبکہ اسی تقرر منامہ میں ، میں سیریل نمبر 3 يرداقع ہوں ج**ناب والا!** مادراء میرن ترقی دینامیر بے ساتھ ناانصافی اور میری حق تلفی کے ساتھ خلاف قانون بھی ہے۔ جناب والا! حق تلفیوں، ناانصافیوں اور قانون کی خلاف درزیوں کا میسلسلہ کب تک چلتار ہیگا۔ آب صاحبان بااختیار بین که ان ناانصافیوں وحق تلفیوں اور قانون کی خلاف درزیوں کولگام دیں۔ المجذا بست المحابي المعاجز إندائيل ب كدان سلسل مين غير جانبداراندانكوائيري فرما كرد مددار المكارول كوقر ارداقعي سزادي توقرين انصاف موكاً .. فعط فضل حقاني STT جي ايج ايس دُهيري الپوري ضلع شانگد خيبر پختون خواه

موبائل نمبر: 0344-9603454 مورند: 06-02-2019



OFFICE OF THE DISTRICT EDUCATION OFFICER (M) SHANGLA AT ALPURAL CONTACT NO. (0996) 850639, 851108- Fax # 851108

OFFICE ORDER

Consequent upon the appeals received from Mr. Khalil Ullah STT GCMHS Alpurai and Mr.Fazal Hagani STT GHS Dherai Alpurai regarding their promotion (Copies Enclosed).

The following committee is hereby constituted to probe in to the matter and submit report with clear cut recommendations within a week time positively.

1. Mr.Muhammad Siraj Principal GHS Dherai(Chairman)2. Mr. Muhammad Iqbal I/C Principal GHS Lilownai(Member)

(Muhamamd Amin) District Education Officer (M) Shangla Dated:__2ら / ろ /2019.

Endst:No! $\frac{025-27}{2}$ /EB(S)/Appeal/AT/TT. Copy of the above is forwarded to:-

- 1. PA to Director Elementary and Secondary Education Khyber
- Pakhtunkhwa, Peshawar.
- 2. The Enquiry Officers concerned
- 3. Teachers concerned.

DY: District Education Officer (M) Shangla



NOTIFICATION/ADJUSTMENT

In pursuance of Notification issued by Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar bearing Endstt; No. 4687-92/File No.1/Promotion Senior Teachers (PSB-16) 2019 Dated Peshawar the 22/2/2019, the following AT,PSHTs,SDM,SCTs B-15 promoted to SST(M/P), SST(B/C)_SST(G)_<u>BP5-16 @ (18910-1520-64510)</u> and further services placed at the disposal of the DEO (M) Shangla are hereby adjusted against the post of SST(M/P), SST(B/C), SST(G) in the Schools mentioned against their names on the terms and condition given below as per under reference notification in the interest of public service w.e.f.22/2/2019.

SII	Name with Designation & School	Name of School where adjusted	Remarks
1	Bakht Jamal PSHT GPS Braim	SST(B/C) GHS Dehrai Maira	AVP
2	Fasiliul Lisan PSHT GPS Sangrai	SST(M/P) GHS Debrai Maira	AVP
3	Fazal Maujood SCT GHSS Olandar	SST(G) GHS Larai Pirkhana	
4	Hussain Ali SCT GHSS Sundvi	SST(G) GMS Khadang	Against Serial No.1 in consequentially
5	Azizullah SCT GHŞ Pagorai	SST(G) GHS RANYAL	AVP
6	Aminullah SCT GHS Amnovi	SST(G) GMS BAZARKOT	AVP
7	Muhammad Ali SCIT GHS Damorai	SST(G) GMS SHAHTOOT	AVP
8	Ahmad zada SCT GHSS Olandar	SST(G) GMS Katkor	
9	Dildar Ali PSHT GPS Kikor	SST(G) GMS Seer Dandai	AVP
10	Altaf Hussain PSHT GPS Naway Kalay	SST(G) GMS PONYAL	AVP
11	Hidayat Ali PSHT GPS Biagalai	SST(G) GHS GANDAW	
12	Muhammad Nawab SDM GHS Kadona	SST(G) GHS Dedal Kaniach	
13	Hameed Ullah SAT GHS Machkandai	SST(G) GMS Behar	AVP
	· · · · · · · · · · · · · · · · · · ·	CONSEQUENTIAL TRANSFER	
14	Abdul Ghafoor SST(G) GMS Khadang	SST(G) GMS Bar Paw Chakisar	٨٧٢

TERMS & CONDITIONS:

- 1. They would be on probation for a period of one year extendable for another one year.
- 2. They will be governed by such rules and regulations as may be issued from time to time by the government.
- Their services can be terminated at any time, in case of their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be preceded under the rules framed from time to time.
- 4. Charge Report 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 their duties.
- 7. They will give an undertaking to be recorded in their Service Books to the effect that if any overpayment is made to them in the light of this order will be recovered and if they are wrong promoted, they will be reversed.

483-96 EB (S)/DA-I Promotion/SST/2019

(MUHAMMI AD AMIN) DISTRICT EDUCATIO OFFICER (M) SHANGLA

Dated: 15/3/2019

Copy forwarder for information & necessary action to the:-

- 1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- 2. Deputy Commissioner Shangla.
- 3. District Nazim Shangla.
- 4. District Monitoring Officer, IMU, Shangla.
- 5. District Accounts Officer Shangla.
- 6. Principal(s)/Headmaster(s)/Incharge(s) concerned.
- 7. Accountant Middle Schools.

8.

The Officials Concerned.

DEPUTX DISTRICT E

CONSTITUTION OF PAKISTAN

[<u>Art. 25A-27</u>]

compulsory education to all children of the age of five to sixteen years in such manner as may be determined by law.]

26. Non-discrimination in respect of access to public places. - (1) In respect of access to places of public entertainment or resort, not intended for religious purposes only, there shall be no discrimination against any citizen on the ground only of race, religion, caste, sex, residence or place of birth.

(2) Nothing in clause (1) shall prevent the State from making any special provision for women and children.

27. Safeguard against discrimination in services. - (1) No citizen otherwise qualified for appointment in the service of Pakistan shall be discriminated against in respect of any such appointment on the ground only of race, religion, caste, sex, residence or place of birth :

Provided that, for a period not exceeding ¹[forty] years from the commencing day, posts may be reserved for persons belonging to any class or area to secure their adequate representation in the service of Pakistan :

Provided further that, in the interest of the said service, specified posts or services may be reserved for members of either sex if such posts or services entail the performance of duties and functions which cannot be adequately performed by members of the other sex 2[:]

²[Provided also that under-representation of any class or area

¹In the first proviso, subs. by the P. O. No. 14 of 1985, Art. 2 & Sch., which again subs. for "twenty" by the Constitution (Sixteenth Amdt.) Act, 1999 (Act VI of 1999), the Gaz. of Pak., Extr., Pt. 1, P. No. 1237, dt. 5th August, 1999.

²In Article 27, in the second proviso, at the end full stop substituted by colon and thereafter third proviso inserted by the Constitution (Eighteenth Amendment) Act, 2010 (Act No. X of 2010), the Gaz. of Pak., Extr., Pt. I, P. No. 267, dt. 20th April, 2010.

44

Chapter No.1

Administrative Law

22

Administrative institutions

These institutions work under certain laws and are bound to act in accordance with these laws. High Court desired Presiding Officer to issue direction to all concerned that while receiving application for supply of certified copies of documents, a date be also given on the receipt issued for the copying fee, indicating that when applicant was required to attend the office for collecting the copies and if on the fixed date certified documents were not collected, then time would start running against him and an obligation would also be fixed on such person to state that why proceedings had not been filed within time.

Administrative instructions

Administrative instructions issued by competent Authority are binding as statutory Rules.

Statutory rules cannot be modified or amended by administrative instructions.

Administrative decisions

The administrative decision must have the following essentials:-

- 1) Administrative adjudication is mostly done by informal process. Written representation in such cases would be sufficient compliance of the principles of natural justice.
- 2) Where an authority had been authorised to make some order under the rule of law, such Authority alone could exercise powers in question. Where

Chapter No.1 anything was particular way not at all. Ord than the comprank, would k moreso, when :

 It is the duty o judicial authc making. The decision makir

4) Whenever any some order, i independently relevant circu made a decisic under the exwould be deen jurisdiction.

5) Every effort sł passed by publ down, inasmuc correctness atta

6) Functionaries c the Constitution clearly within Governmental functionaries a: perform their of action/orders/de State function principle, Hig

Civil Servants Act, 1973

horvice or post by

such service or post by r, be reverted to the service the he was promoted or st which he holds a lien, or the service or post, be

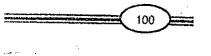
case of initial appointment evant shall not be deemed l of probation satisfactorily cedents have been verified inion of the appointing

on probation shall, on on of his probation, be on in a service or, as the may be prescribed.

ted to a post or grade on eligible for confirmation factory service for the onfirmation therein.

onfirmation against any

during the period of his to be confirmed in any post retires from service ed shall not, merely by



reason of such retirement, be refused confirmation in such service or post or any benefits accruing therefrom.

N.W.F.P. Civil Servants Act, 1973

(5) Confirmation of a civil servant in a service or post shall take effect from the date of occurrence of a permanent vacancy in that service or post or from the date of continuous officiation, in such service or post, whichever is later.

8. Seniority:

(3)

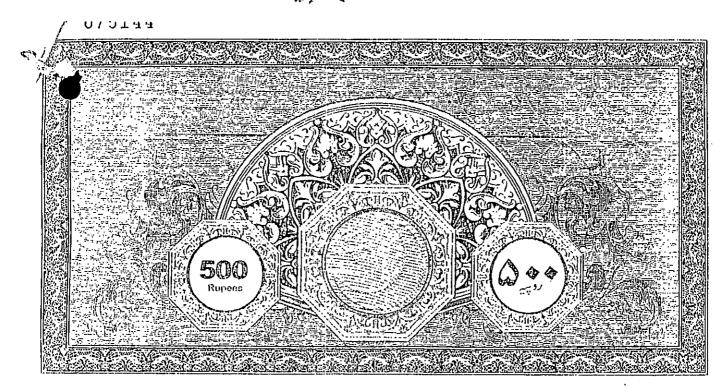
- (1) For proper administration of a service, cadre or grade, the appointing authority shall cause a seniority list of the members for the time being of such service, cadre or grade to be prepared, but nothing herein contained shall be construed to confer any vested right to a particular seniority in such service, cadre or grade, as the case may be.
- (2) Subject to the provisions of sub-section (1) the seniority of a civil servant shall be reckoned in relation to other civil servants belonging to the same service or grade, whether serving in the same department or office or not, as may be prescribed.

Seniority on initial appointment to a service, grade or post shall be determined as may be prescribed.

Seniority in the grade to which a civil servant is promoted shall, take effect from the date of regular appointment to a post in that grade:

101

		fref ag
ha	N.W.F.P. Civil Servants Act, 1973,	N.W.F.P.
	The seniority lists prepared under sub-section shall be revised and notified in the official dazette at least once in a calendar year, preferably in the month of January.	registered on merit for appointment post along with his other batch-ma while ignoring civil servant appoint those posts when they fell vacant. (
senic	Provided that, civil servants who are selected for notion to a higher-grade in one batch shall on their notion to the higher grade, retain their inter se prity as in the lower grade.	exhausting departmental remedies Court in its Constitutional jurisdicti his grievance. Department admitte eligibility to be appointed to specific up plea that due to "non-follow "
. 9.	Promotion:	"pursuance" of civil servant his nam
(1)	A civil servant possessing such minimum qualifications as may be prescribed shall be	final selection list. High Court direct appointment of civil servant to specif
• •	being reserved under the rules for departmental	10. Postings and transfers: Every civil servant shall be
	promotion in the higher grade of the service or cadre to which he belongs.	anywhere within or outside the Pro
(2)	A post referred to in sub-section (1) may either	under the Federal Government, (Government or local authority or a c
	be a selection post or a non-selection next to a	set up or established by any s
	which promotion shall be made as may be prescribed:-	Provided that, nothing contained in apply to a civil servant recruited spe
(a)	in the case of a selection post, on the basis of	a particular area or region:
1	selection on merit; and	Provided further that, where required to serve in a post outside h
(b) j	in the case of a non-selection post, on the basis of seniority-cum-fitness.	his terms and conditions of service
Comm		not be less favourable than those have been entitled if he had not b
	Section 9 of the Act provides (serve.
or and	Section 9 of the Act provides for the promotion civil servants. The government may make rule	Comments: ·
ion su	ch promotion in the light of the section. ing to 1996 SCMR 379, a civil servant was	Civil servant is liable to
	- oro, a civil servant was	within or outside the Province to :
Automotive and an and the second	102	
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F.C.		



PAKISTAN COURT FEE

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SYED SULTANAT KHAN

Advocate High Court,

ottice: 10-25 Continental Plaza Stakannagh Mingoro 7 19540-26

NOTICE FOR INFORMATION

To,

1. Government of Khyber Pakhtunkhwa through Secretary of Elementary & Secondary Education at Civil Secretariat Peshawar.

ایڈو کیٹ دامی کو راٹ

- 2. Director of Elementary & Secondary Education, Government of Khyber Pakhtunkhwa at Peshawar.
- 3. District Education Officer (M)Shangla.
- 4. <u>Secretary to Government of Khyber Pakhtunkhwa, Finance Department at</u> <u>Peshawar.</u>
- 5. <u>Secretary to Government of Khyber Pakhtunkhwa, Establishment Department</u> <u>at Peshawar.</u>
- 6. Accountant General of Khyber Pakhtunkhwa at Peshawar.
- 7. District Accountant Officer Shangla at Alpurai.
- 8. Attaur Rahman S/o Bahrut Vioom R/o Kormang, District Shangla.

Assalam-U-Alaikum !

It is to bring into your kind notice, that, a writ petition in the august Peshawar High Court, Mingora Bench / Darul Qaza Swat, on behalf of Fazal Hagani (Petitioner) against you, has been filed, hence you are informed.

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Syed Sallanal Khan Advocate High Court

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR

5. A. A.

Service Appeal No. _____ / 2021

Fazal Haqani S/o Fazal Mubin R/o Zara, Dherai, Tehsil Alpurai, District Shangla.

...Appellant

- VERSUS-

- Government of Khyber Pakhtunkhwa through Secretary of Elementary & Secondary Education at Civil Secretariat Peshawar.
- Director of Elementary & Secondary Education, Government of Khyber Pakhtunkhwa at Peshawar.
- 3. District Education Officer (M)Shangla.
- Secretary to Government of Khyber Pakhtunkhwa, Finance Department at Peshawar.
- 5. Secretary to Government of Khyber Pakhtunkhwa, Establishment Department at Peshawar.
- 6. Accountant General of Khyber Pakhtunkhwa at Peshawar.
- 7. District Accountant Officer Shangla at Alpurai.
- 8. Attaur Rahman S/o Bahrul Uloom R/o Kormang, District Shangla.

...Respondents

Appeal Under Section 4 of the Service Tribunal Act, 1974.

Respectfully Sheweth;

1. That appellant is bonafide resident of Zara, Dherai, Tehsil Alpurai, District Shangla (Copy of NIC of appellant is annexure A). That vide letter No. 3356-34 dated 31-12-2004, the appellant was appointed as Theology Teacher (TT) (Male) in Government Middle School Banr, District Shangla (Copy of appointment order is attached as annexure B).

3. That vide order Endst No. 3994-4000/File No.1/Promotion Senior TT B-16 Dated Peshawar the 28-05-2013, the appellant was promoted against the post of Senior TT (BPS-16) at Government High School Dehrai, Alpurai, District Shangla, however, later on vide office order / adjustment Endost: No. 2804-10 dated 03-06-2013, the appellant adjusted / transferred to the above said school in pursuance of the notification dated 28-05-2013 (Copies of notification dated 28-05-2013 and order dated 03-06-2013 are attached as annexure C & D).

4. That vide order Endost: No. 2938-42 dated 28-08-2017, the education department has promoted a junior one from STT to SST, despite the fact that appellant is senior, who is at serial No. 3 in the appointment order list, has been illegally dropped and respondent No. 8, who is at serial No. 17 in the above said appointment order list has been promoted from the post of Senior Theology Teacher (STT) to Secondary School Teacher (SST) (Copies of order dated 28-08-2017 is annexure E).

5. That after getting knowledge of the above said impugned promotion / upgradation of respondent No. 8, and another notification Endst: No. 4681-86/File No.2/Promotion SST B-16 Dated Peshawar the 22-02-2019, wherein some posts of STTs were upgraded to SSTs, but again appellant was illegally and unlawfully dropped and one Muhammad Karim S/o Mohammad Hanif R/o Maira, District Shangla, who was at serial No. 6 in the appointment order list, was upgraded instead of appellant, against which appeal was filed by appellant, and the District Education Officer (M) Shangla /

respondent' No. 3 constituted α committee for recommendations, however after thorough inquiry of the committee, constituted by respondent No. 3. the upgradation / promotion of Muhammad Karim was declared illegal, however the upgradation / promotion of respondent No. 8 remained undecided (Copies of notification, appeal, order-dated 30-03-2019 of respondent No. 3 and order of respondent No. 2 are, attached as annexure F, G, H & I respectively).

6. That appellant for several times has orally requested the official respondents to prepare seniority list of appellant, but the official respondents are clearly denying to prepare and handover the seniority list of appellant.

7. That being aggrieved from inactions, discriminatory attitude of respondents, the appellant has no other adequate and efficacious remedy, thus approached this august court inter alia on the following grounds.

GROUNDS:

That inaction and denial of the respondents to give promotion / upgradation to appellant from STT to SST is illegal, unlawful and against the principles of law and justice.

ii. That under the terms of policy, the appellant was entitled to promotion / upgradation in SST being senior from respondent No. 8.

iii.

That though the appellant stood at serial No. 3 with merit position 49.22 and respondent No. 8 at serial No. 17 with merit position 40.72 at initial appointment order list, but even then the official respondents have illegally and unlawfully upgraded / promoted the respondent No. 8 instead of appellant being meritorious. That the appointing authority illegally and without preparing an authentic seniority list, has favoured respondent No. 8 and promoted / upgraded him to the posts SST, whereas the policy needs seniority cum fitness and as per rules and Civil Servant Act, 1973, no vested right to particular seniority is allowed, thus the official respondents have made clear discrimination with the appellant.

That according to the prevailing promotion policy of education department; 4% quota is reserved for promotion from STT to \$ST on seniority cum fitness base, but even then appellant has not been promoted.

That fundamental rights of the appellant has been violated by the respondents.

That promotions / upgradations of private respondents are in clear violation of established rules, law and policy and the appellant is entitled to be considered as SST.

viii.

vi.

vii.

iv.

That respondents have no power and authority to deprive the appellant from his accrued right of upgradation / promotion.

ix. That the education department for their ulterior motives has consciously omitted discrimination with the appellant.

x. That the education department / official respondents without adopting proper procedure have filled the SST posts without considering the appellant.

xi. That respondents are not authorized to deny the preparation of seniority list.

xii. Any other grounds not specifically raised will be argued with prior permission of this august court. It is therefore very humbly prayed that, on acceptance of the instant writ petition;

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Inaction and denial of respondents from promotion / upgradation of appellant, may please be declared null and void.

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ii.

iii.

iv. 🗉

Office Order Endost: No: 2938-42 dated 28-08-2017; may please be rectified and modified to the extent of giving promotion / upgradation to the appellant.

The appellant may please be declared to be entitle to promotion / upgradation from STT to SST.

The respondents may please be directed to promote / upgrade the appellant from STT to SST with all back benefits.

Any other relief not specifically prayed but this august court deems proper may also be granted.

Appellant Through Counsel

Syed Saltanat Khan Advocate High Court Dated: 06-10-2021

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR

Service Appeal No. _____ / 2021

Fazal Haqani

- VERSUS -

· Govt: of KP and others.

...Respondents

...Petitioner,

Page | 6

<u>Certificate</u>

It is certified as per information of my client that no such like other service appeal has been earlier filed before this Hon'ble tribunal

> Appellant Through Counsel

(dv

Syed Saltanat Khan Advocate High Court

...Appellant

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR

Service Appeal No. _____ / 2021

Fazal Haqani S/o Fazal Mubin R/o Zara, Dherai, Tehsil Alpurai, District Shangla.

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- 3. District Education Officer (M)Shangla.
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That though the appellant stood at serial No. 3 with merit position 49.22 and respondent No. 8 at serial No. 17 with merit position 40.72 at initial appointment order list, but even then the official respondents have illegally and unlawfully upgraded / promoted the respondent No. 8 instead of appellant being meritorious. iv. That the appointing authority illegally and without preparing an authentic seniority list, has favoured respondent No. 8 and promoted / upgraded him to the posts SST, whereas the policy needs seniority cum fitness
and as per rules and Civil Servant Act, 1973, no vested right to particular seniority is allowed, thus the official respondents have made clear discrimination with the appellant.

That according to the prevailing promotion policy of education department, 4% quota is reserved for promotion from STT to \$ST on seniority cum fitness base, but even then appellant has not been promoted.

That fundamental rights of the appellant has been violated by the respondents.

vi.

viii.

ix..

vii. •That promotions / upgradations of private respondents are in clear violation of established rules, law and policy and the appellant is entitled to be considered as SST.

That respondents have no power and authority to deprive the appellant from his accrued right of upgradation / promotion.

That the education department for their ulterior motives has consciously omitted discrimination with the appellant.

 That the education department / official respondents without adopting proper procedure have filled the SST posts without considering the appellant.

xi. That respondents are not authorized to deny the preparation of seniority list.

 xii. Any other grounds not specifically raised will be argued with prior permission of this august court.

_ Page **|5**

It is therefore very humbly prayed that, on acceptance of the instant writ petition;

- i. Inaction and denial of respondents from promotion / upgradation of appellant, may please be declared null and void.
- ii. Office Order Endost: No. 2938-42 dated 28-08-2017, may please be rectified and modified to the extent of giving promotion / upgradation to the appellant.
- iii. The appellant may please be declared to be entitle to promotion / upgradation from STT to SST.
- iv. The respondents may please be directed to promote / upgrade the appellant from STT to SST with all back benefits.

Any other relief not specifically prayed but this august court deems proper may also be granted.

Appellant Through Counsel

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Syed Salvanat Khan Advocate High Court Dated: 06-10-2021

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR

Service Appeal No. _____ / 2021

Fazal Haqani. - VERSUS -Govt: of KP and others.

...Petitioner

Page | 6

...Respondents

<u>Certificate</u>

It is certified as per information of my client that no such like other service appeal has been earlier filed before this Hon'ble tribunal

> Appellant Through Counsel

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Syed Saltanat Khan Advocate High Court

SEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR, CAMP COURT AT GULKADA, SWAT

Service Appeal No. 4280 / 2021

Mr. Fazal Haqani.

... Appellant

VERSUS.

Secretary E&SE and others.

...Respondents

Parawise comments on behalf of respondents No. 6 & 7

Respectfully Sheweth:

Accountant General of Khyber Pakhtunkhwa at Peshawar and District Accountant Officer Shangla at Alpurai (Respondents No. 6 & 7 respectively), do hereby endorse / relies on the parawise comments already filed before the Hon'ble Service Tribunal Khyber Pakhtunkhwa, by the principal respondents No. 1, 2 and 3.

The parawise comments of respondents No. 1, 2 and 3 may be treated as reply of present respondents No. 6 & 7 i.e. Accountant General of Khyber Pakhtunkhwa at Peshawar and District Accountant Officer-Shangla at Alpurai.

ccountant General

Accountant General Khyber Pakhtunkhwa, (Respondent No. 6) District Accountant Officer Shangla at Alpurai (Respondent No. 7)

GS&PD.KP.SS-1776/1-RST-5,000 Forms-09.05.18/P4(Z)/F/PHC Jos/Form A&B Ser. Tribunal "A" KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR. JUDICIAL COMPLEX (OLD), KHYBER ROAD, PESHAWAR. No. 4280 Fazal Hagani No. of 20 APPEAL No..... **Apellant/Petitioner** · Versus Throy) Sery: (EZSE) **RESPONDENT(S)** Respino 2 Director (ERSE) Notice to Appellant/Petitioner..... Pell Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 6-10-22at 7:00 A 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. At camp Poisy Swul Registrar. Khyber Pakhtunkhwa Service Tribunal, Peshawar.

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KHYBER PAKHTUNKHWA	SERVICE TRIBUNAL, PESHAWAR.
	EX (OLD), KHYBER ROAD,
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	Respondent No
Notice to: _ Atta ur Re	hman 5/0 Bahryl Uloom Shangla
RIU Kormang	Shangla

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this

office Notice No.....dated.....dated

1 20 2-2 camp Court

Registrar. Khyber Pakhtunkhwa Service Tribunal, Peshawar.

Note:

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The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays. Always quote Case No. While making any correspondence.