

17.06.2022

Appellant present through counsel.

Muhammad Adeel Butt, learned Additional Advocate General alongwith Lutfullah Litigation Assistant for official respondents No.1 to 3 present. Reply of official respondents No.1 to 3 has already been submitted.

Preliminary arguments heard. Record perused.

Points raised need consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notice be issued to private respondent No.4 for submission of comments. To come up for reply/comments of private respondent No.4 <sup>on</sup> 19.08.2022 before S.B at Camp Court, Abbottabad.



(Rozina Rehman)  
Member (J)  
Camp Court, A/Abad

21<sup>th</sup> Oct, 2022

None for the appellant present. Mr. Muhammad Jan, District Attorney for the respondents present.

Written reply/comments not submitted. Respondents are directed through District Attorney to submit written reply/comments on the next date positively. To come up for written reply/comments on 26.12.2022 before S.B.



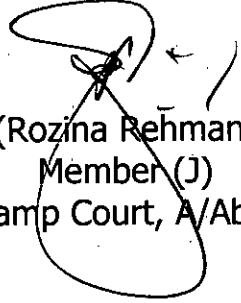
(Kalim Arshad Khan)  
Chairman

19.01.2022

Appellant present through representative.

Kabir Ullah Khattak, learned Additional Advocate General alongwith Lutf Ullah Litigation Assistant for respondents present.

Despite last chance, reply was not submitted. Case is adjourned on the cost of payment of Rs. 5000/- which shall be borne by the respondents. To come up for reply and preliminary hearing on 18.04.2022 before S.B at Camp Court, Abbottabad.

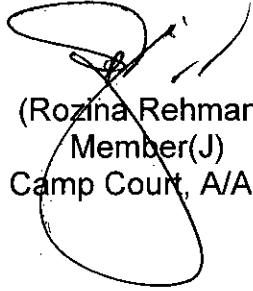
  
(Rozina Rehman)  
Member (J)  
Camp Court, A/Abad

18.04.2022

Nemo for appellant.

Kabir Ullah Khattak, learned Additional Advocate General alongwith Lutf Ullah Litigation Assistant for official respondents present.

Representative of the official respondents submitted reply/comments which are placed on file. Notice be issued to appellant/counsel and private respondent No.4 for 17.06.2022 for preliminary hearing before S.B at Camp Court, Abbottabad.

  
(Rozina Rehman)  
Member (J)  
Camp Court, A/Abad

17.06.2022

Appellant present through

Muhammad Adil Butt, Advocate  
alongwith Cufullah Chigani  
respondents No.1 to 3 present through  
No.1 to 3 has already been

Preliminary arguments. Reason refused.

There is no need of adjournment. The appeal is admitted  
for regular hearing subject to legal objections. The appellant  
is directed to deposit the court process fee within 10 days.

Thereafter, the appeal will be heard as respondent No.4  
submission of private respondent No.4  
private respondent

Abbottabad

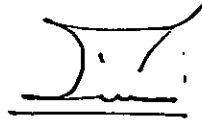
(Signature)

(1)

30.11.2021

Learned counsel for the appellant present.

Notices be issued to the respondents for submission of written reply/comments on the next date. Case to come up for submissions of written reply/comments on 17.01.2022 before the S.B at Camp Court Abbottabad.



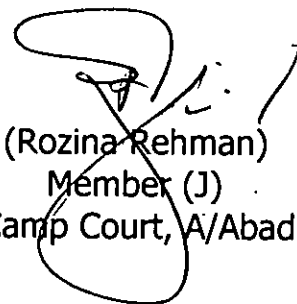
(Salah-Ud-Din)  
Member (J)  
Camp Court Abbottabad

17.01.2022

Appellant present through counsel.

Kabir Ullah Khattak, learned Additional Advocate General alongwith Lutf Ullah Litigation Assistant for respondents present.

Reply on behalf of respondents is still awaited. Representative of respondents seeks time to submit reply. Last chance is given. To come up for reply and preliminary hearing on 19.01.2022 before S.B at Camp Court, Abbottabad.



(Rozina Rehman)  
Member (J)  
Camp Court, A/Abad

17.03.2021

Appellant present through counsel.

Asif Masood Ali Shah learned Deputy District Attorney for respondents present.

Preceding date was adjourned on a Readers' note, therefore, respondents be put on notice for 13/7/2021 with last chance to submit comments before S.B at Camp Court, Abbottabad.



(Rozina Rehman)  
Member (J)  
Camp Court, A/Abad

13.07.2021

Due to COVID-19, tour to Abbottabad has been cancelled, therefore, case to come for the same as before on 15.10.2021.



Reader

15.10.2021

Learned counsel for the appellant present and sought time for preliminary hearing. Adjourned. To come up for preliminary hearing on 30.11.2021 before the S.B at Camp Court Abbottabad.




(SALAH-UD-DIN)  
MEMBER (JUDICIAL)  
CAMP COURT ABBOTTABAD

Due to covid ,19 case to come up for the same on / /  
at camp court abbottabad.

Reader

Due to summer vacation case to come up for the same on

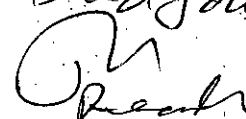
18.19.20 at camp court abbottabad.

  
Reader

18.09.2020

Mr. Hamayun Khan, Advocate for appellant is present. While narrating the factual background of the instant appeal, the learned counsel representing the appellant submitted that consequent upon the induction of appellant as Arabic Teacher on 09.03.2010 he was posted at Government High School Tahkot where he rendered his respective duties. Respondent No. 4 was also appointed as Arabic Teacher at Abbottabad in the year 1987 where-after he was transferred from District Abbottabad to District Mansehra as such was posted at Government Middle School Kalwal lassan Nawab Mansehra. On 26.01.2018 respondent referred to was transferred from District Mansehra to District Battagram and he was accordingly placed at the bottom of seniority list maintained for Arabic Teacher at the referred to district. On preparation of seniority list the respondent No. 4 was placed at serial No. 19. That on 13.03.2019 respondent No. 4 was promoted as Senior Arabic Teacher without justification granting him BPS-16 while holding previously scale of BPS-15. The departmental appeal proved abortive. Since the issue of limitation is involved therefore, it is deemed appropriate to dispatch a pre-admission notice to the respondents for 14.12.2020 directing them to submit their reply on attendance before S.B at Camp Court, Abbottabad.

(MUHAMMAD JAMAL KHAN)  
MEMBER  
CAMP COURT ABBOTTABAD

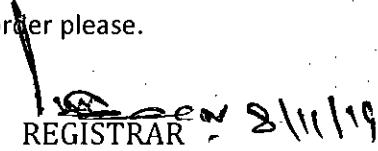

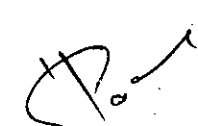
Due to covid-19 case is adjourned to  
17-03-2021  


Form- A

FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No.- 1506/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	08/11/2019	<p>The appeal of Mr. Lutf-ur-Rehman presented today by Mr. Hamayun Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR - 8/11/19</p>
2-		<p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>24-1-2020</u></p> <p> CHAIRMAN</p>
	24.01.2020	<p>Appellant absent. Learned counsel for the appellant absent. Due to general strike of the bar on the call of Khyber Pakhtunkhwa Bar Council, the case is adjourned. To come up for preliminary hearing on 20.03.2020 before S.B at Camp Court Abbottabad. Appellant be put to notice for the date fixed.</p> <p> Member Camp Court, A/Abad</p>

7

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA**  
**SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. 1506 /2019

Lutf ur Rehman son of Muhammad Zahir (Arabic Teacher) Govt. Higher Secondary School Thakot Battagram.

...APPELLANT

**VERSUS**

Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Peshawar & others.

...RESPONDENTS

**SERVICE APPEAL**

**INDEX**

<i>S.#</i>	<i>Description</i>	<i>Page No.</i>	<i>Annexure</i>
1.	Memo of Appeal	1 to 6	
2.	Copy of appointment order	7	"A"
3.	Copy of transfer order	8	"B"
4.	Copy of seniority list	9	"C"
5.	Copy of promotion order	10	"D"
6.	Copy of appeal	11	"E"
7.	Wakalatnama	12	

...APPELLANT

Dated: 5/11 /2019

Through

  
(HAMAYUN KHAN)  
Advocate High Court, Abbottabad



**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA**  
**SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. 1506 /2019

Lutf ur Rehman son of Muhammad Zahir (Arabic Teacher) Govt. Higher Secondary School Thakot Battagram.

...APPELLANT

Khyber Pakhtunkhwa  
Service Tribunal

VERSUS

Diary No. 1596

Dated 08/11/2019

1. Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Peshawar.
2. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. District Education Officer (Male) Battagram.
4. Shah Jehan (Arabic Teacher) Govt. Higher Secondary School Thakot Battagram.

...RESPONDENTS

**File-to-day**  
**Registrar**  
**8/11/19**

**SERVICE APPEAL** UNDER SECTION 4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED PROMOTION ORDER DATED 13/03/2019 PASSED BY RESPONDENT NO. 3 WHERE BY RESPONDENT NO. 4 WAS PROMOTED FROM ARABIC TEACHER (BPS-15) to (BPS-16) WHICH IS ILLEGAL, AGAINST

THE LAW, FACTS AND LIABLE TO BE SET ASIDE  
TO THE EXTEND OF RESPONDENT NO. 4.

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**PRAYER:-** ON ACCEPTANCE OF INSTANT  
APPEAL PROMOTION ORDER DATED 13/03/2019  
OF THE RESPONDENT NO. 4 MAY KINDLY BE  
DECLARED AGAINST THE LAW, POLICY AND  
APPELLANT BE PROMOTED TO THE POST OF  
SENIOR ARABIC TEACHER BPS-16 BEING SENIOR  
IN ALL RESPECT.

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Respectfully Sheweth;-

May it please your lordship appellant beg to solicit on the  
following factual and legal grounds;-

1. That appellant was appointed as Arabic Teacher on  
09/03/2010 and was posted at Govt. High School  
Thakot. Copy of appointment order is attached as  
Annexure "A".
2. That thereafter appellant submitted Arival Report  
and continuously performing his duty till date with  
full devotion and liabilities. There had no

complaint against the appellant in respect of his responsibilities.

3. That respondent No. 4 was appointed as Arabic Teacher at District Abbottabad in the year 1997 and later on he was transferred from District Abbottabad to District Mansehra and was posted at Govt. Middle School Kalwal Lassan Nawab Mansehra.
4. That on 26/01/2012 respondent was transferred from District Mansehra to District Battagram by the respondent No. 2 and according to transfer order dated 26/01/2012 respondent No. 4 was placed at the bottom of seniority list of A.T Teacher District Battagram. Copy of transfer order is annexed as Annexure "B".
5. That thereafter respondent No. 3 prepared seniority list and according to list respondent No. 4 was placed at Serial No. 19. Copy of seniority list is attached as Annexure "C".
6. That on 13/03/2019 respondent No. 3 issued impugned promotion of the respondent No. 4

without justification and respondent No. 4 was promoted from BPS-15 to Senior Arabic Teacher BPS-16 and the same was not disclosed to the appellant and the appellant was kept in dark in this respect. Copy of promotion order is attached as Annexure "D".

7. That feeling aggrieved from the impugned promotion order appellant filed departmental appeal before the respondent No. 2 but till date respondent No. 4 did not passed any order on the said appeal hence this service appeal on the following grounds. Copy of appeal is annexed as Annexure "E".

**GROUND S;-**

- a. That impugned promotion order against the law facts and liable to be set aside.
- b. That promotion order of the respondent No. 4 is against the policy and rules.

- c. That at the time of promotion order respondent No. 3 ignored all basic principle and requirement of promotion.
- d. That promotion order dated 13/03/2019 is against the condition mentioned in transfer order dated 21/01/2012 issued by respondent No. 2 hence liable to be set aside.
- e. That other Seniors Teachers were not qualified and similarly some of them were not interested in promotion and refused the same. Similarly, some teachers were retired from service only at serial No. 9 & 11 were promoted and appellant was top of seniority list but respondent No. 3 with malafide intentions by ignoring the present appellant, promoted the respondent No. 4, who was at serial No. 19 of the seniority list and also is junior to the appellant, hence impugned order to the extent of respondent No. 4 is liable to be set aside.
- f. That at the time of promotion respondent No. 3 ignored seniority list and issued

promotion order against the law and natural justice.

- g. That respondent No. 3 issued impugned promotion order and concealed all actual fact, hence liable to be set aside.
- h. That other points shall be urged at the time of arguments.

It is, therefore, humbly prayed that, on acceptance of instant appeal promotion order dated 13/03/2019 of the respondent No. 4 may kindly be declared against the law, policy and appellant be promoted to the post of senior Arabic Teacher BPS-16 being senior in all respect.

  
...APPELLANT

Through

Dated: 5/4 /2019

  
(HAMAYUN KHAN)

Advocate High Court, Abbottabad

**VERIFICATION:-**

*Verified on oath that the contents of forgoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.*

  
...APPELLANT

# ANNEXURE 'A' 7

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (ELE & SEC: EDU: ) BATTAGRAM.

APPOINTMENT ORDER:-

As approved by the competent authority, Mr: Lutfur Rehman I/O Muhammed Zahir (L) Ex-AT Govt: High School Thakot is hereby appointed against AT post at Govt: High School Thakot in BPS-09 under "deceased son quota" vide Notification No: SOR-IV/TEAD/1-3/2003/V-II dated, 05-09-2006 in the interest of public service with effect from the date of his taking-over charge on the following terms & conditions:-

TERMS AND CONDITIONS:-

He is entitled to get all benefits and as admissible under the rules in civil servant act except pension/gratuity. He should however be entitled to receive such amount contributed by him towards the contributory Provident Fund a/with contribution by the provincial Govt: to his account in the said fund in the prescribed manner. Provided further that in the event of death of a civil servant whether before or after retirement his family should be entitled to receive the said amount if it is already not been received by the concerned.

Charge report should be submitted to all concerned.

The candidate is required age & health certificate from the Medical Superintendent DHQ Hospital Battagram.

The candidate should join his post within three days after the issue of this order otherwise, appointment order will be cancelled automatically.

He will paid salaries after verification of his certificates from the concerned Board/Wafaq on his own expenses by the D.D.O concerned. Personally/by-hand verification will not be acceptable.

EXECUTIVE DISTRICT OFFICER  
ELEMENTARY & SEC: EDUCATION  
BATTAGRAM.

Post: No. 523-25 / EB/ AE-II/ F- (AT-2007) dated 08 / 03 / 2010

*Attested*  
*H. DA*

Copy for information and n/s to the:-

1. I/O Headmaster Govt: High School Thakot.
2. District Accounts Officer, Battagram.
3. Candidate concerned.

EXECUTIVE DISTRICT OFFICER (MALE)  
ELEMENTARY & SECY: EDUCATION,  
BATTAGRAM.

Annexure B 8

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA PESHAWAR

OFFICE ORDER.

Consequent upon ban relaxation given by the competent authority, I  
Shah Jahan A.T. GMS, Kaluwal District Mansehra is hereby transferred against the vac.  
post of AT, at GMS, Battangi District Battagram in his own pay & BPS in the interest  
public service with effect from the date of his taking over charge.

Note:-

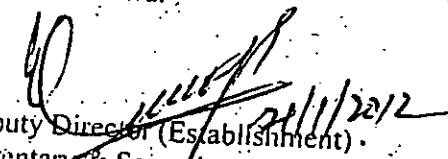
1. Charge reports should be submitted to all concerned.
2. No TA/DA etc. is allowed.
3. The EDOs ( E&SE ) concerned are directed to check his  
original service documents before, making payment of salary.
4. His seniority will be determined at the bottom of S/List under  
the rules.

**DIRECTOR**  
Elementary & Secondary Education  
Khyber Pakhtunkhawa, Peshawar.

Endst: No. 2948-53 /F.No.1015/A-15/CT/  
Mansehra:/P/Transfers. Dated Peshawar the 21/1/2012

Copy of the above is forwarded for information & n/a to the:-

1. Executive District Officers ( E&SE ) Mansehra & Battagram.
2. District Accounts Officers Mansehra & Battagram.
3. Headmasters concerned.
4. Teacher Concerned.
5. P.A to the Directress E&SE Khyber Pakhtunkhawa.
6. M/File.

  
Deputy Director (Establishment)  
Elementary & Secondary Education,  
Khyber Pakhtunkhawa, Peshawar.

Attested



# Annex

S.No	Name of Teacher	Father's Name	Name of School	Desig.	BPS	Don
1	2	3	4	5	6	
1	Lutfullah	Abdur Rab	GHS Kanai	AT	15	Batt
2	Abdur Rahman	Hamid Ullah	GHS Gantar Allai	AT	15	Batt
3	Amir Muhammad	Haji Qalandar Shah	GMS Gangwal	AT	15	Batt
4	Mehrur Rehman	Haji Kamil	GMS Deshawal	AT	15	Batt
5	Alim ur Rehman	Astakhil Khan	GMS Koshgram	AT	15	Batt
6	Farman Shah	Sahib Shah	GMS Ajmera	AT	15	Batt
7	Umar Farooq	Shena Khan	GMS Barachar	AT	15	Batt
8	Mumtaz Hussain	Ghulam Nabi	GHS Miran	AT	15	Batt
9	Zahoor ul haq	Abdul Qayum	GHS Pirhari	AT	15	Batt
10	Hussain Ullah	Molvi Fridullah	GMS Kaktai	AT	15	Batt
11	Ghulam Khan	Abdul Ghaffar	GHS Peshora Battagram	AT	15	Batt
12	Ubaid ur Rehman	Muhammad Abdullah	GMS Jesol	AT	15	Batt
13	Jamil Ur Rehman	Ghulam Rabbani	GHS Shamali	AT	15	Batt
14	Ihsanul haq	Mian Gul	GHS Chiran	AT	15	Batt
15	Zaka ur Rehman	Ubaid ur Rehman	GMS Mirza Banda	AT	15	Batt
✓ 16	✓ Lutfur Rahman ✓	✓ Muhammad Zahir ✓	✓ GHS Tahkot Battagram ✓	✓ AT ✓	✓ 15 ✓	✓ Batt ✓
17	Rahat ul Haq	Muhammad Azam	GMS Karwar	AT	15	Batt
18	Muhammad Bilal	Ikhtiar Malook	GMS Ghari N/Said	AT	15	Batt
✓ 19	✓ Shah Jahan ✓	✓ Muhammad Hussain ✓	✓ GMS Bishkot ✓	✓ AT ✓	✓ 15 ✓	✓ Batt ✓
20	AbdulStar	Abdul Ghaffor	GISS Paimal Sharif	AT	15	Batt
21	Zai Ur Rehman	Rasool Khan	GMS Batangi BM	AT	15	Batt
22	Abdul Qayum	Gul Afzal	GMS Nowshera	AT	15	Batt
23	Lutfullah	Hussain Ahmad	GHS Hill	AT	15	Batt
24	Musharaf Shah	Fazl Ur Rehman Shah	GMS Kotwal	AT	15	Batt
25	Ziaullah		GMS Jhangri Pashto	AT	15	Batt

Attested  


*Annexur 'D' (10)*  
**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)**  
**BATTAGRAM**

**POSTING / ADJUSTMENT ORDER**

Consequent upon the recommendations of Departmental Promotion Committee and in pursuance of Govt. of Khyber Pakhtunkhwa Elementary and Secondary Education Department Notification No. SO (B&A)/1-18 /E&SE/2012 Dated 11/07/2012 and Finance Department Ednst No. SO(FR)/FD/10-22(E)/2010 dated 16/07/2012 and in pursuance of Director E&SE Khyber Pakhtunkhwa Notification issued under Endstt No. 4531-36/File No. 1/Promotion Senior Teacher (BPS-16)2019 dated Peshawar the 22/02/2019, the following Male ATs are hereby promoted to the post of SAT B-16 (Rs.18910-1520-64510) plus usual allowances as admissible under the rules on the regular basis under the existing policy of Provincial Government, on the terms and conditions given below is further posted/adjusted at the schools noted against their names with immediate effect in the interest of public service:-

S.No.	Name of teacher	Present school	School where Adjusted	Remarks
1 ✓	Shah Jehan	GMS Bishkot	GHSS Thakot	Vice Mr. Lutfur Rehman AT B-15 (Newly Upgraded SAT Post)
2	Zahoor Ul Haq	GHS Pirhauri	GHS Batamori	Vice Muhammad Waliullah AT B-15
3	Ghulam Khan	GHS Peshora	GHS Banna Allai	Against V/Post
<b>Consequential Adjustment</b>				
1	Mr. Lutfur Rehman AT B-15	GHSS Thakot	GMS Bishkot	Vice S.No.1
2	Muhammad Waliullah AT B-15	GHS Batamori	GHS Peshora	Vice S.No.3

**TERMS AND 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 Govt.
3. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
4. Charge reports should be submitted to all concerned.
5. Their inter-se-seniority on lower post will remain intact.
6. No TA/DA is allowed for joining their duty.
7. They will give an undertaking to be recorded in their Service Books to the effect that if any over payment is made to them in the light of this order will be recovered and if they are wrongly promoted they will be reversed.

MUHAMMAD SHAUKAT  
 District Education Officer (M)  
 Battagram

Endst: No. 2344-51 /EB-III/AT to SAT/ Promotion. Dated Battagram the: 13/3/2019.

**Copy of the above is forwarded to:-**

1. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar w.r to his No. cited above.
2. Deputy Commissioner Battagram
3. District Accounts Officer Battagram
4. Principals/Headmasters Concerned.
5. Budget and Accounts Officer local office.
6. Assistant Programmer EMIS local office.
7. DMO IMU Battagram.
8. Teacher concerned.

*Allocated*

District Education Officer (M)  
 Battagram  
 13/3/19

DEO (M) Battagram  
Report Plea

# Annexure 'E'

محکمہ صحت ڈائریکٹریٹ آف ایجوکیشن KPK

عنوان! درخواست برائے فراہمی انصاف

جناب عالی،

آداب گزارش ایمانی حکیم بزدہ 09<sup>03</sup>/<sub>2010</sub> سے ہائی سکول تھا کوٹھ میں عربی ٹیچر تعینات ہے  
ایجوکیشن آفس بگرام کے سینارٹی لسٹ کے مطابق بزدہ کا اوس نمبر ہے۔

شاہ جہان ولد محمد حسین 1997 میں حکیم تعلیم ضلع ایبٹ آباد میں عربی ٹیچر مقرر ہوئے بعد ازاں  
GMS Kalwal میں نو اب ضلع مانسہرہ ٹرانسفر ہوئے۔ شاہ جہان 26<sup>01</sup>/<sub>2012</sub> کو ضلع  
بگرام ٹرانسفر ہوئے۔ اب جبکہ ایجوکیشن آفس بگرام کے سینارٹی لسٹ میں شاہ جہان  
کا نمبر 19 ہے تھا جو موجودہ سینارٹی لسٹ میں حروف کو 8 میں تبدیل کیا گیا ہے اور حروف  
کو SAT پر پروموشن بھی دی گئی ہے۔

ملف No: 2492/2542 کے ڈپٹی ڈائریکٹر نے 2013 میں Issue کیا ہے جس کے مطابق کوئی بھی ملازم  
ضلع سے بدلے مقرر ہو جائے اور ملازم ڈومیسائل ڈسٹرکٹ آنا چاہے تو اسکی سینارٹی لسٹ  
نہیں ہوگی حکیم ضلع بگرام 1994 میں الگ ضلع بنا اور شاہ جہان کی پہلی Appointment 1997  
میں ہوئی ہے لہذا اسی قانون تحت شاہ جہان سینارٹی لسٹ کے آخر میں گیا۔ (الٹرنے)

سابقہ DEO ریاض سواتی جانے نے شاہ جہان کی پروموشن روک دی تھی لیکن DEO سواتی  
کے ٹرانسفر کے بعد آفس کی علی گھٹ اور approach سے اسے پروموشن کیا گیا جو سراسر  
نا انصافی ہے۔

KPK ایجوکیشن لوز کے مطابق دوسرے ضلع میں ٹرانسفر ہونے کی صورت میں سرکاری ملازم  
سینارٹی لسٹ کے Bottom میں جائے اور وہاں کی سینارٹی لسٹ کو متاثر نہیں کریگا  
درخواست کے ساتھ سابقہ اور موجودہ سینارٹی لسٹ لف ہیں۔

اس لیے جناب سے عدل و انصاف کی اپیل کی جاتی ہے کہ حکیم ساتھ انصاف روائے دل داری فرمائیں  
بزدہ صاحب کو عدل و انصاف سے متعلقہ دستور دیا جائے۔  
علین نواز شہ سوگی  
الہ ریزہ  
لوف الرحمن ولد محمد اعجاز خان

تاریخ: 10<sup>07</sup>/<sub>2019</sub>

0345-9469702

Handwritten signature and official stamp of the Department of Education, Government of Khyber Pakhtunkhwa, Peshawar. The stamp includes the text 'ATTESTED' and 'Department of Education, Government of Khyber Pakhtunkhwa, Peshawar'.

# وکالت نامہ

کورٹ فیس

بعدالت Before the K P K Senior Tribunal

عنوان: Sutjun Rahman نام Grant

مخائب: Appellant

نوعیت مقدمہ: Appeal  
باعث تحریر آنکہ A. Abad

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آن مقام

Hamayun Khan & Fuzalullah Khan

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ و تقرر ٹائٹ و فیصلہ بر طرف دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا محکمہ صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پرداختہ مجھ کو منظور قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہر جانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔ نیز بتایا تم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر محکمہ مقرر کردہ میں کوئی جزو بتایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد استجارت ناشر بیسٹہ مفلسی کے دائرہ کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

الرقوم: 5/11/19

بمقام:

Accepted by -

[Signature]

[Signature]

لطیف الرحمن

اسد علی

**"A"**

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

T/B

No.

APPEAL No..... 1506 ..... of 20 19

Lutf ur Rehman

Appellant/Petitioner

Versus

Through Secy: Edu: KPIC Pesh:

RESPONDENT(S)

Notice to Appellant/Petitioner

Lutf - ur - Rehman S/o M. Zahid  
(Arabic Teacher) Govt: Higher  
Secondary School Thakot  
Battagram

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 20-3-2020 at 9:00 AM

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

at Camp Court Abbottabad

[Signature]  
Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

**"B"**

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

No..

75

Appeal No..... 1506 ..... of 2019

Lotif vs Rehman ..... Appellant/Petitioner.  
Versus

Through Secy: Edu: K.P.S.T. ..... Respondent  
Respondent No..... 3

Notice to: - Distt: Education officer (male)  
Battagram

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on.....17/1/2019.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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.....

Given under my hand and the seal of this Court, at Peshawar this.....7/1/19.....

Day of.....Dec:.....2019

at Camp Court A. Shad

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.

**"B"**

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

No.

7B

Appeal No. 1506 of 20 19

Lutf ur Rahman Appellant/Petitioner  
Through Self Versus Edm: KPI Pesh.  
Respondent

Respondent No. Shah Jehan (Arabic Teacher Genl.)  
Higher Secondary School Thakot  
Balagrum

Notice to: —

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above ~~case by the petitioner~~ 17-1-2022 in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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.....

Given under my hand and the seal of this Court, at Peshawar this 7/12

Day of Dec 20 21

*at Camp Court A. Abad*

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

- Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazotted Holidays.  
2. Always quote Case No. While making any correspondence.

“A”

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

No. *Regd*

*TB A/A*  
*19*

APPEAL No. *1506* of 20

*Mtff M. Rehman*

Appellant/Petitioner

Versus

*Muhammad Saif (E85F) Pesh*

RESPONDENT(S)

Notice to Appellant/Petitioner

*Counsel Humayun Ishaq Advocate*  
*High Court A/Abad*

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on *17-6-22* at *8:00 AM*.

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

*at court*  
*A/Abad.*

*[Signature]*  
Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.



**"A"**

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

*TB A/A*

No.

APPEAL No.....*1506*..... of 20*19*

*Lutf vs Rehman*

Appellant/Petitioner

Versus

*Through (ESSE) Peshawar*

RESPONDENT(S)

Notice to Appellant/Petitioner

*Lutf vs Rehman s/d*

*Mohammad Zahid AT Through ~~SB~~*

*(ESSE) Pesh*

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on *17-6-22* at *8:00 AM*

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

*at camp court*

*A/Abad*

*[Signature]*  
Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

"A"

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

TB A/A

No.

1506

19

APPEAL No..... of 20

Iutf vs Rehman

Appellant/Petitioner

Versus

Through (ESSE) Peshawar

RESPONDENT(S)

Iutf vs Rehman s/o

Notice to Appellant/Petitioner

Mohammad Zahid AT Through (ESSE) Pesh

Take notice that your appeal has been fixed for Preliminary hearing, replication/affidavit/counter affidavit/record/arguments/order before this Tribunal on 17-8-22 at 8.00 AM at .....

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 Court

AiAbad.

Registrar,

Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL CAMP**

**COURT ABBOTTABAD**

**SERVICE APPEAL No. 1506 of 2019**

**Lutf ur Rehman S/O Muhammad Zahir .....Appellant**

**VERSUS**

**Government of Khyber Pakhtunkhwa through Secretary E&SE KPK Peshawar and  
others.....Respondents**

**INDEX**

<b>S. NO</b>	<b>DESCRIPTION /DOCUMENTS</b>	<b>ANNEXURE</b>	<b>PAGES</b>
1	Comments		1 to 3
2	Affidavit		4
3	Copy of Appointment & transfer orders of Respondent No. 4	A	5 to 13
4	Copy of Notification dated 21-01-2013	B	14 to 16
5	Copy of minutes of DPC meeting	C	17 to 19

**Respondent**

(1)

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE**

**TRIBUNAL CAMP COURT ABBOTTABAD**

**SERVICE APPEAL No. 1506 of 2019**

Lutf ur Rehman S/O Muhammad Zahir .....Appellant

**VERSUS**

Government of Khyber Pakhtunkhwa through Secretary E&SE KPK  
Peshawar and others.....Respondents

**Joiant Para-wise comments /Reply on behalf of  
Respondents NO. 1 to 3**

**Respectfully Sheweth:**

**Preliminary Objections**

1. That the appellant has no cause of action/locus standi to file the present appeal.
2. That the appellant has concealed the material facts from this Hon'ble Tribunal.
3. That the appellant has not come to this Hon'ble Tribunal with clean hands.
4. That the appellant has filed the instant appeal on malafide grounds, just to put pressure on the respondent Department for illegal benefits.
5. That the appellant's appeal is against the prevailing rules and law.
6. That the appellant is estopped by his own conduct to file the instant appeal.
7. That the instant appeal is not maintainable in its present form and also in the present circumstances of the issue.
8. that the appeal is bad for mis-joined and non-joined of necessary and proper parties.

**ON FACTS**

1. Para No. 1 of the appeal is correct pertaining to the appointment of the appellant, hence needs no comments.
2. Para No. 2 pertains to the service record of the appellant.
3. Para No. 3 of the appeal is correct.
4. Para No. 4 of the appeal is correct to the extent of transfer of the respondent No. 4 from District Masehra to District Battagram. However respondent NO. 4 was appointed in the year 1997 by the Divisional Director of Hazara Division and then he was transferred from Mansehra to Battagram on 21-01-2012 while on 31-08-2012 a guidance notification No. 2296 to EDO Peshawar and 21-01-2013 a Clarification Notification for determination of seniority for the promotion of different cadres was issued to all the District Education Officers (Male & Female) in Khyber Pakhtunkhwa through Notification No.2492-2542/Seniority/Promotion/Estab and Endst: No. 2543-45/File No.1/A-88/KC/S.list Dated Peshawar the 21-01-2013 whereas it is clearly mentioned that " the seniority of the teacher who was appointed before the abolishment of

Divisional Directorate and transferred to his own domicile district, after abolishment of Divisional Directorates, will not be disturbed and he may be placed with his counterparts on his due place in the Seniority list". In the light of said notification respondent No. 4 was placed on his due seniority and was promoted accordingly. (Copy of appointment and Transfer orders of respondent No. 4 and Notifications are attached as *Annex: "A & B"*).

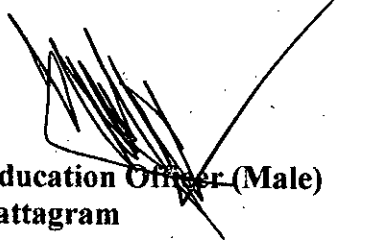
- 5. Para No. 5 is correct to the extent of preparation of seniority list by respondent No. 3, and on the basis of transfer order of respondent No.4 he was placed at the bottom however after the notifications of Directorate dated 31-08-2012 and 21-01-2013 respondent No. 4 was placed on serial no 8 of the revised seniority list of 2018 and recommended for promotion by the Departmental Promotion Committee. (Copy of minutes of DPC and seniority list are attached as *Annex: "C"*).
- 6. Para No. 6 of the appeal as composed is incorrect hence denied. Detailed reply is given in Para No. 4 and 5 of the reply.
- 7. The appellant has no cause of action and locus standi to file subject appeal.

**ON GROUNDS:**

- a. Ground "a" of the appeal is incorrect, hence denied. The impugned promotion order is well within the four corners of law and rules.
- b. Ground "b" of the appeal is incorrect hence denied. The promotion order of the respondent No. 4 is not against the policy and rules as replied in detailed in the preceding para.
- c. Ground "c" of the appeal is incorrect. Respondents followed the law/rules and regulation of the department and acted accordingly. Detailed reply is given in the preceding paras.
- d. Ground "d" of the appeal is incorrect. Respondents followed instructions of the department which was issued after the transfer order of respondent No. 4 and acted accordingly as replied in para No. 4 and 5 of the facts.
- e. Ground "e" of the appeal as composed is incorrect. Detailed reply is given in the preceding paras.
- f. Ground "f" of the appeal is incorrect, hence denied. Respondent No. 3 did not ignore the seniority list and not issued promotion order against the law and natural Justice, detailed reply is given in preceding paras.
- g. Appellant has got no cause of action/locus standi.
- h. Respondents also seek permission of this Honorable Tribunal to raise other legal and factual Grounds during the course of arguments before this Honorable Service Tribunal.

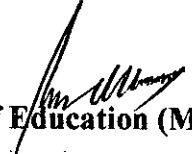
It is therefore most humbly prayed that on acceptance of above Para-wise comments, the appeal of the appellant may graciously be dismissed with cost.

**RESPONDENT NO. 3**



**District Education Officer (Male)  
Battagram**

**RESPONDENT NO. 2**



**Director of Education (Male) Khyber  
Pakhtunkhwa Peshawar**

**RESPONDENT NO. 1**



**Secretary Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar**

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL CAMP**  
**COURT ABBOTTABAD**  
**SERVICE APPEAL No. 1506 of 2019**

**Lutf ur Rehman S/O Muhammad Zahir .....Appellant**

**VERSUS**

**Government of Khyber Pakhtunkhwa through Secretary E&SE KPK Peshawar and  
others.....Respondents**

**AFFIDAVIT**

I ~~M Bakht Zada~~ District Education officer (Male) Battagram do hereby affirm and declare on oath that contents of accompanying **Joint Para-wise comments** on behalf of respondent NO. 1 to 3 are true and correct to the best of my knowledge and belief that nothing has been concealed from this Honorable Court.



DEPENDENT  
CNIC: \_\_\_\_\_  
15302-2019264-5

Amman: A-1111  
5

OFFICE OF THE DIV. DIRECTOR OF EDUCATION (SCHOOLS) HAZARA DIV. ABBOTTABAD.

APPOINTMENTS

Consequent upon their selection by the Departmental Committee, the Divisional Director of Education (Schools) Hazara Division Abbottabad has pleased to appoint the following Arabic Teachers (Male) at the School noted against their names in BPS-9 (1605-1-3060) plus usual allowances as admissible under the rules with effect from the date of taking over charge subject to the existing terms and conditions:

S.NO.	NAME OF CANDIDATES AND ADDRESS.	DATE OF BIRTH	NO OF MERIT	SCHOOL WHERE APPOINTED.	REMARKS
1.	Muhammad Qasim Ex-AT GMS Manshera.	15.06.57	1/96	GMS Manda Gusha (Manshera)	Vice Iftakhat Not selected terminate.
2.	Ajmal Hussain S/o Mir Afzal Hussain PTC Lami Battal.	06.05.73	2/92	GHS Neel Bata.	Vice M. Tahir Terminatd. Not sel: n merit.
3.	Ziaul Rehman PTC Ex-S/O Ali Aman R/o Dara Man.	10.01.71	3/86	GHS Sowar	V/M. Shoaib Terminated.
4.	Atta-ur-Rohman PTC GPS Khulsa Baffa.	02.02.67	4/85	GMS Manshera (Manshera)	V/Shabir Ahmed Terd: Not sel: n merit.
5.	S. Arif Hussain Shah S/o Pirmansoor Shah R/o Dila Pota (Mans)	24.02.66	5/77	GMS Khayriata	V/Abdul Bas Termid: as not sel: n merit.
6.	Mohd. Saleem S/o Mohd Sharif R/o Bandi Manra.	24.07.74	6/74	GMS Gul Bandi	V/N. Mistin Terminated. Not sel: n merit.
7.	Noor-ul-Haq S/o Ghulam AT GMS Chatta (Manshera)	Jan.02.04.63	7/73	GMS Chatta.	Post already occupied.
8.	Dast Muhammad S/o Faqir Mohd H. No. 1875 KTS H/pur.	01.01.65	8/72	GMS Thalikota (Haripur)	V/Mirafzal Terminated. Not sel: n merit.
9.	Baqat Ali S/o Qalandarali T.T. GMS Mathal	08.3.69	9/71	GMS Rankote (Manshera)	V/Abdullah Terminated as Not sel: n merit.
10.	Ghulam Karim S/o Faqir Muhammad R/o Manshera	21.05.68	10/71	GMS Kancerari (Haripur)	V/Samiullah Terminated. Not sel: n merit.
11.	Abdur Raheeq S/o Abdul Haq R/o Shumati Bandi (Mans)	04.03.69	11/71	GMS Sokal (Manshera)	V/M. Asif Terminated.
12.	Shamsur Rehman S/o Malik-- ur Rehman PTC GPS Hum Nakka.	15.11.74	12/71	GMS Davel	V/Misakat Khan Terd: Not sel: n merit.
13.	Shoib S/o Abdul Karim R/o Nawasher ATD.	20.01.73	13/70	GHS Lakhala.	V/Abdur Rehman Ter: Not sel: n merit.
14.	Shah Nawaz S/o Mohd Sharif R/o Guli Bagh Manshera.	26.06.63	14/69	GMS Shatial	V/Sherzada Terminated. Not sel: n merit.
15.	Zia-Ul-Islam S/o M. Idrees Moh: Nari Manshera.	25.02.72	15/69	GMS GMS Batera	V/Abdur Rehim, Not sel: n merit.
16.	Mohd Saleem S/o Ajab Khan R/o Riala, Abad.	04.02.72	16/67	GMS Peri Bagal	V/M. Niaz Terminated, as not sel: n merit.
17.	Khalid Saifullah S/o Hazrat AT GMS Nari	07.04.70	17/67	GMS Nari	Post already occupied.

*Amman*



6

	2	3	4	5	6
45.	Mohd Altaf S/o M. Aslam PT GMS Tala A.G.	08.09.73	56	GMS Gora Bag Gran. (A. Abad)	V/M. Riaz Terminated Not sel: on merit.
46.	Ahtaf-ur-Rehman AT GMS Bandi Salali, Mansehra.	31.03.74	56	GMS Bandi Salali.	Post already occupied.
47.	Abdul Wahid S/o Fazal Khalid PT GMS No.3 Mansehra.	08.04.77	56	GMS Gerhan H/R	V/Sabir Hu Not sel: on merit.
48.	Amrazaeb AT GMS Jabba.	1966	55	GMS Jabba K/H.	Post already occupied.
49.	Abdur Rehman R/o Kohis:	01.06.68	55	GMS Mehreen K/H.	V. Zairat G sel: on merit. Terminated.
50.	Matur Rehman CT GMS Bandi Puwa (ATD)	10.03.70	55	GMS Khabal H/Pur.	V/Jamil Terminated.
51.	Mohd Labi S/o A.T GMS Bandi Gilla K/H.	1970	55	GMS Bandi Gilla.	Post already occupied.
52.	Ibrar Ahmed AT GMS Seri Manoor.	13.06.73	55	GMS Seri Manoor.	--do--
53.	Nisar Ahmed S/o Feroz Din Qari GMS Sawan Khar H/Pur.	10.04.75	55	GMS Bandi Maglian.	V/Ibrar Hus ain Termd: not sel: on merit.
54.	Mohd Shafi S/o H. Yaqoob R/o Taffa.	20.05.63	54	GMS Kuthera H/P	V/Iqbas Hus Terminated. No sel: on merit.
55.	Ehmad Ellahi S/o Noor Ahmad R/o Talhada Ma:	14.02.65	54	GMS Khawar H/H.	V/Furqan Terminated. No sel: on merit.
56.	Ghulam Khan S/o Abdul Chafiq Qari GMS Peshora.	01.04.74	54	GMS Summer Nullah.	V/Kamiya Terminated. No sel: on merit.
57.	Shah Nawaz AT GMS Daran Panda	02.03.72	54	GMS Daran Pani.	Post already occupied.
58.	Mohd Azam S/o Fazal Ellahi R/o Birkunda Hand:	12.1.70	53	GMS Jab Haripur.	V/Farooq Terminated. Not sel: on merit.
59.	Anwar-ul-Haq S/o Karim R/o Baria Hans:	15.06.70	53	GMS Durkote H/P	V/Hafiz Tahir Termd: as not sel: on merit.
60.	Mohd Musah S/o Abdur Wahab A.T GMS Basha K/H.	01.02.72	53	GMS Basha K/H.	Post already occupied.
61.	Abdul Hafiz S/o Abdul Majid R/o S/Salah.	01.01.75	53	GMS Hassan Bai.	V/Liaqat Ali, Terminated. Not selected on merit.
62.	Rafaqat Hussain S/o Mohd Hussain R/o S:Najar Khan.	05.03.70	53	GMS Halli H/Pur.	V/M. Younis Terminated. Not sel: on merit.
63.	Mohd Tayyub S/o M. Ishaq R/o Sh:Najar Khan Mans.	17.08.77	53	GMS Dheri Naqarch- ian (H/Pur)	V/Saidur Rehman Termd: Not sel: on merit.
64.	Farman ullah S/o Munsif Khan R/o Muner Baia ATD.	15.03.72	53	GMS Makar Khan Kalan,	V/M. Noeed Terminated. Not sel: on merit.
65.	Ghulam Mustafa S/o Ghulam Rasool R/c E/Hasham Khan.	20.04.78	53	GMS Noor Pur.	V/Aqdur Rashid Termd:
66.	Rashid Ahmed S/o Tous Khan AT GMS Kasala. ATD.	01.04.66	52	GMS Kasala.	Post already occupied.
67.	Fazlul Din S/o Mohd Qazi R/o Bandi.	1967	52	GMS Harigan KH	V/Sumander Khan -ermd: as not sel: on merit.
68.	Shah Zaman S/o Ghulam Ali R/o Gehri G.R. Ullah.	12.02.69	52	GMS Bat Gall.	V/Iqbal Terminated. Not sel: on merit.
69.	Muz Farooq S/o Shine Khan R/o Serai Ahtaf.	23.04.69	52	GMS Jaba Mada Khal K.D.	V/Habib-ur- Rehman Termd: as not sel: on merit.
70.	Ullah S/o Mohd Hanan. PT GMS Chand Mad Khe.KD.	30.04.71	52	GMS Chand Mad Khal K.D.	Post already occupied.
71.	Asad Ahmed AT GMS Dhok Khan.	25.12.72	52	GMS Dhok Gakhar- ian.	--do--

*Handwritten signature*

7

74	Abdul Qadeer S/o Abdur R/o Kohistan.	1972	52	GMS Chakki R/H	V/Parsi Khan Terminated. Not
75	Sarifjoo Din S/o Hamidullah R/o A. Abad.	03.09.73	52	GMS Kader M.A.P.	V/Ehsanullah Terminated. Not
76	Ahmad Lab S/o Mohd. Zaman R/o Havelian.	04.05.74	52	GMS Taathi Khurd.	V/Trakhar Terminated. Not
77	Mohd. Iqbal S/o Hazrat R/o Akote.	07.04.76	52	GMS Gandra Mada Khet, K.D.	V/S. Asnullah Terminated. Not
78	Mohd. Sabir S/o Ali Zaman R/o Banda Haira ATD.	27.1.78	52	GMS Anadi H/P	V/Mohd. Aslam Terminated. Not
79	Abdul Rehman S/o Malikullah R/o Havelian.	02.02.78	52	GMS Bariyan KH	V/Juma Khan Terminated. Not
80	Qazi Jabar Mehmood S/o Adil Khan R/o Bandi Bansen.	01.04.78	52	GMS Sindhra (Havelian)	V/Hussain Malik Terminated. Not
81	Shah Jahan S/o M. Hussain R/o Tikote.	09.04.79	52	GMS Ghazikote (Tinnawari)	V/Ishfaq Ahmed Terminated. Not
82	Aurangzeb S/o Ghulam Hussain R/o Koz K;H.	1969	52	GMS Hajaabad (K/H)	V/Majid Khan Terminated.
83	Mohd. Mustafa S/o Abdul Mansoor R/o Mans.	08.06.59	51	GMS Bandi Keth (Manselira)	V/Abdur Razag Terminated. Not
84	Mohd. Ali S/o Mohd. Ali R/o Kohistan.	1969		GMS Jadder KH	V/H. B. B. H. Terminated. Not
85	Shameer Ali S/o Juma Khan R/o Havelian.	1972	51	GMS Naserabad	V/H. Ashraf Terminated. Not
86	Nizakat Khan S/o Badan Khan R/o R. B. A. T. D.	12.2.58	50	GMS Mangon H/R	V/Kala Khan Terminated. Not
87	Mohd. Rafiq S/o Ali Zaman R/o Havelian.	05.01.75	49	GMS G. Maki (H/Pur)	V/Mohd. Hakim Terminated. Not
88	Mohd. Ali AT GMS Khabal	14.02.63	47	GMS Khabal	Post already occupied.
89	Hisar Ahmed AT GMS No. 3 Manselira.	02.05.66	47	GMS No. 3 Manselira.	Post already occupied.
90	Mohd. Naveed Shah S/o Maroof Shah R/o Havelian.	01.04.68	47	GMS Palian H/R	V/H. Aslam Terminated. Not
91	Jamil Ahmed AT GMS Pirda Havelian.	01.01.71	47	GMS Pina Hasam Havelian.	Post already occupied.
92	Shahzadeh Khalid Mehmood AT GMS P. Sund. Mans.	20.04.71	47	GMS P. Sund.	Post already occupied.
93	Shoukat Minn S/o Ajab Khan R/o Abotabad.	20.08.76	47	GMS P. Sund.	V/Mohd. Riaz Terminated.

TERMS AND CONDITIONS

They will be governed by such rules & regular inforce and as prescribed by the Govt: from time to time for the category of the Govt: services to which they belonging.

Their services will be liable to termination on one months notice from either side. In case of resignation without notice one months pay will be forfeited in lieu thereof.

They should be notified one month of the issue of this notification.

Their inter. seniority will be determined in accordance with the Merit of Departmental selection Committee.

Charge reports should be submitted to all concerned.

12/5/79  
177 Malik  
[Signature]

- They will be probation for period of two years and will have to pass Departmental Examination. In case a candidate fails to qualify the Departmental Examination he will be given one more chance. If he fails again than his services will be terminated. On arrival/availability of trained teacher the services of un/Trained teacher occupies the post will be terminated.
- 7. Their original Certificates/Degree should be checked and verified from the concerned University/AISSE/RDE /Marigal Hauras and Islamic institutions concerned before handing over charge.
- 8. Service books of the teachers must be prepared completely in all respects before handing over charge.
- 9. The declaration of Assets should be submitted to the authority concerned on record.
- 10. They are required to produce Health and Age Certificates from Medical authority concerned before taking over charge.
- 11. They should not given to the over age candidates. His case for over relaxation be sent to the concerned quarters.
- 12. Orders for transfer before the complete of tenure will disqualify him from service.
- 13. DO 1/DA is allowed.
- 14. An undertaking shall be obtained from Master & Degree holder PTC CT 149 that they will service the department for at least 5 years.
- 15. Trained Qualified with service in the department candidates having qualifications of BA/BSc IInd Div; may be placed in BPS/14 CT 149.9 un Trained un qualified teachers above will be placed in BPS.9.
- 16. The above appointments are subject to production/verification of original Degree/Certificates by the concerned Principal/Headmasters and LEO. Any Candidate if fails to produce requisite documents may not be allowed to take over charge and report submitted to this Directorate.
- 17. The teachers whose services have been terminated as above have not been selected/approved by the Department selection committee.
- 18. The case of person appointed as an untrained teacher, He will have to pass the required training examination within a period of 3 years failing which his service will be terminated.
- 19. Complete information of each category (Separate) in consolidated list in the prescribed (attached) along with charge report be submitted by the lower officer to his direct superior and be checked positively.

*[Handwritten signature]*

Sd/  
 (UMAR FAROOQ)  
 DIV: DIRECTOR OF EDUCATION (SCHOOLS)  
 HAZARA DIVISION ABBOTTABAD.

Encl: No. 13331-13532. /AD: T/AT(M) Dated, 25.6. /1997.

Copy for information to the:-

- 1. The Accountant General N.W.F.P Peshawar.
- 2. The Director of Secondary Education NWFP Peshawar.
- 3. The Director of Primary Education NWFP Peshawar.
- 4-8. The District Accounts officer Concerned.
- 9-99. The Principal/Headmasters Concerned.
- 100. The P/S to Secretary of Govt: NWFP Peshawar Edu: Deptt:
- 01-200. Official Concerned.
- 01. Office order file.

Y.H. AWAL

for DIV: DIRECTOR OF EDUCATION (SCHOOLS)  
HAZARA DIVISION ABBOTTABAD.

Handwritten Urdu text: *میں نے اس کو دیکھا ہے*

Handwritten signature: *Atisical*

Handwritten notes on the left margin: *11-10-97*, *11/11/97*, *11/11/97*

(10)

A.S. 11/11/97

OFFICE OF THE DIV: DIRECTOR OF EDUCATION  
(SCHOOLS) HAZARA DIVI: ABBOTTABAD.

No 25199 / AE-I/AT(M) Corr: g:  
Dated 26/8 /1997.

The Headmaster,  
Govt: High School  
Pind Kargo Khan (A. Abad)


AMMENDMENT/CHARGE.

Subject:  
Memo,

I am directed to refer to your letter No and dated n  
and inform you that Mr. Shah Jehan S/o ~~Muhammad~~ Hussain R/o Thakote  
(Newly appointee) was appointed at GMS Maidan (Kohistan) but there i  
no vacant A.T post.

Due to non availability of post he has been posted/Adj  
at your School against A.T post vide this office Office order No. 44/  
AT(M) dated 2.8.97 issued under Endst: No. 20618-20/AE-I/AT(M) of ev

You are requested to handover charge to above named  
against post being newly appointee.

  
FCR/DIV: DIRECTOR OF EDUCATION:  
HAZARA DIVISION ABBOTTABAD.

*Muhammad  
M. K.*

13

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA PESHAWAR

OFFICE ORDER.

Consequent upon ban relaxation given by the competent authority, Mr. Shah Jahan A.T GMS, Kaluwal District Mansehra is hereby transferred against the vacant post of AT, at GMS, Battangi District Battagram in his own pay & BPS in the interest of public service with effect from the date of his taking over charge.

Note:-

1. Charge reports should be submitted to all concerned.
2. No TA/DA etc is allowed.
3. The EDOs ( E&SE ) concerned are directed to check his original service documents before, making payment of salary.
4. His seniority will be determined at the bottom of S/List under the rules.

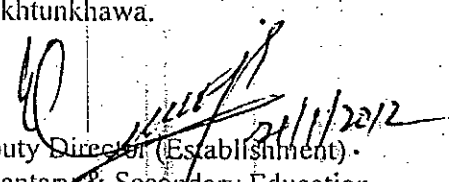
**DIRECTOR**

Elementary & Secondary Education  
Khyber Pakhtunkhawa, Peshawar.

Endst: No. 2948-53 /F.No.1015/A-15/CT/ Dated Peshawar the 21/1/2012  
Mansehra:/P/Transfers.

Copy of the above is forwarded for information & n/a to the:-

1. Executive District Officers ( E&SE ) Mansehra & Battagram.
2. District Accounts Officers Mansehra & Battagram.
3. Headmasters concerned.
4. Teacher Concerned.
5. P.A to the Directress E&SE Khyber Pakhtunkhawa.
6. M/File.

  
Deputy Director (Establishment).  
Elementary & Secondary Education,  
Khyber Pakhtunkhawa, Peshawar.

PP 1 9

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (M.E. & SEC. EDU: BATEGRAM)

ORDER.

The following A.T teachers are hereby transferred in the school noted against their own pay and EPS in the interest of public service with immediate effect:-

S.No.	Name of Teacher/School	School where posted.	Remarks.
1.	Shah Jehan, A.T GMS, Batangi.	GMS, Bishket	Vacant post.
2.	Fazlan Shah, A.T GMS, Mirzabanda.	GMS, Batangi	

Charge reports should be submitted to all concerned.

EXECUTIVE DISTRICT OFFICER  
M.E. & SEC. EDU: BATEGRAM

Endst: No 3307-10

M.E./E-II/P-AT

Date: 12/04/2012.

Copy to the:-

1. District Accounts Officer Batgram.
2. I/C Pay section local Office.
3. I/C H.M GMS, Batangi/Mirzabanda.
4. Teachers Concerned.

DISTRICT OFFICER (MALE)  
M.E. & SEC. EDU: BATEGRAM



# OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)

13

## BATTAGRAM

### POSTING /ADJUSTMENT ORDER

Consequent upon the recommendations of Departmental Promotion Committee and in pursuance of Govt. of Khyber Pakhtunkhwa Elementary and Secondary Education Department Notification No. SO (B&A)/1-18 /E&SE/2012 Dated 11/07/2012 and Finance Department Ednst No.SO(FR)/FD/10-22(E)/2010 dated 16/07/2012 and in pursuance of Director E&SE Khyber Pakhtunkhwa Notification issued under Endstt No.4531-36/File No.1/Promotion Senior Teacher (BPS-16)2019 dated Peshawar the 22/02/2019, the following Male ATs are hereby promoted to the post of SAT B-16 (Rs.18910-1520-64510) plus usual allowances as admissible under the rules on the regular basis under the existing policy of Provincial Government, on the terms and conditions given below is further posted/adjusted at the schools noted against their names with immediate effect in the interest of public service:-

S.No.	Name of teacher	Present school	School where Adjusted	Remarks
1	Shah Jehan	GMS Bishkot	GHSS Thakot	Vice Mr:Lutfur Rehman AT B-15(Newly Upgraded SAT Post)
2	Zahoor Ul Haq	GHS Pirhari	GHS Batamori	Vice Muhammad Waliullah AT B-15
3	Ghulam Khan	GHS Peshora	GHS Banna Allai	Against V/Post
<b>Consequential Adjustment</b>				
1	Mr:Lutfur Rehman AT B-15	GHSS Thakot	GMS Bishkot	Vice S.No.1
2	Muhammad Waliullah AT B-15	GHS Batamori	GHS Peshora	Vice S.No.3

#### TERMS AND CONDITIONS:-

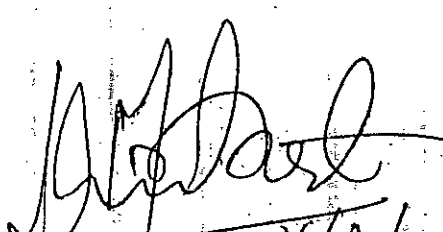
1. They would be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period, In case of misconduct, they shall be proceeded under the rules framed from time to time.
4. Charge reports should be submitted to all concerned.
5. Their inter-se-seniority on lower post will remain intact.
6. No TA/DA is allowed for joining their duty.
7. They will give an undertaking to be recorded in their Service Books to the effect that if any over payment is made to them in the light of this order will be recovered and if they are wrongly promoted they will be reversed.

MUHAMMAD SHAUKAT  
District Education Officer (M)  
Battagram

Endst: No. 2344-51 /EB-III/AT to SAT/ Promotion. Dated Battagram the: 13/3/2019.

#### Copy of the above is forwarded to:-

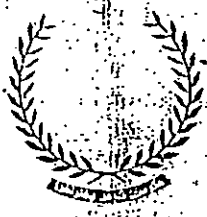
1. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar w.r to his No. cited above.
2. Deputy Commissioner Battagram
3. District Accounts Officer Battagram
4. Principals/Headmasters Concerned.
5. Budget and Accounts Officer local office.
6. Assistant Programmer EMIS local office.
7. DMO IMU Battagram.
8. Teacher concerned..

  
District Education Officer (M)  
Battagram



Annex B

(14)  
(7)



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

PH No. 091-9201389, 9210938,  
9210437, 9210957, 9210468  
Fax 091-9210936 0800-33857  
No. 2492-2542 Seniority/Promotion/Estab  
Dated Peshawar the 27/07/2012  
2492-2542

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

Subject: Clarification for Determination of Seniority for the Promotion of  
PST B-12 to Senior PST B-14 and PSHT B-15, Qari B-12 to B-15, CT B-  
15 to Senior CT B-16, AT B-15 to Senior AT B-16, TT-15 to Senior TT  
B-16, DM B-15 to Senior DM B-16 and PET B-15 to Senior PET B-16.

Memo: I am directed to refer to the subject noted above and to clarify that Seniority for the Promotion of PST B-12 to the post of Senior PST B-14 and PSHT B-15, Qari B-12 to the post of Senior Qari B-15, CT B-15 to Senior CT B-16, AT B-15 to Senior AT B-16, TT-15 to Senior TT B-16, DM B-15 to Senior DM B-16 and PET B-15 to Senior PET B-16, upgraded in Primary, High and Higher Secondary Schools in Elementary and Secondary Education Department at District Level will be determined under the provision of Section 8 Chapter-II of THE NWFP (NOW KHYBER PAKHTUNKHWA) CIVIL SERVANTS ACT, 1973 (N.W.F.P. (NOW KHYBER PAKHTUNKHWA) Act No. XVII of 1973) which is reproduced as under:-

513  
28-1-13

- For proper administration of a service, cadre or [post], the appointing authority shall cause a seniority list of the members for the time being of such service, cadre or [post] to be prepared, but nothing herein contained shall be construed to confer any vested right to a particular seniority in such service, cadre or [post] as the case may be.
- 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 [cadre] whether serving the same department or office or not, as may be prescribed.
- Seniority on initial appointment to a service, [cadre] or post shall be determined as may be prescribed.
- Seniority in a post, service or cadre to which a civil servant is promoted shall take effect from the date of regular appointment to that post; Provided that civil servants who are selected for promotion to a higher post in one batch shall, on their promotion to the higher post, retain their inter-se seniority as in the lower post.

DDEO (M/P)  
SDEO (M/P)

To be noted and take the official Gazette at least once in a calendar year, preferably in the month of July as directed accordingly.

24/7/12

I am further directed to further clarify that

P.s 13-1  
1-2-13

1. The seniority cannot be considered from the date of appointment as untrained, the seniority will be from the date of regular appointment to a post or from the date of passing the prescribed Professional qualifications in case of untrained appointment to a post under the provision of Section 8(4) Chapter-II of THE NWFP (NOW KHYBER PAKHTUNKHWA) CIVIL SERVANTS ACT, 1973 (N.W.F.P. Act No. XVIII of 1973).

Signature

2. The Seniority of the teacher who was appointed before the [redacted] Divisional Directorates and transferred to his own domicile [redacted] Divisional Directorates, will not be disturbed and he may be placed in counterparts on his due place in the Seniority list.

3. Similarly the Seniority of the teacher, who was appointed before [redacted] a district and transferred to his own domicile district [redacted]

15 8

disturbed and he may be placed with his counterparts on his due place in the Seniority list.

"Promotion"

Under the provision of Section 9(1) Chapter-II of THE NWF (NOW KHYBER PAKHTUNKHWA) CIVIL SERVANTS ACT, 1973 (N.W.F.P. Act No. XVII of 1973. A civil servant possessing such minimum qualifications as may be prescribed, shall be eligible for promotion to a 10[higher] post for the time being reserved under the rule for departmental promotion in 11[ ] the service or cadre to which he belongs.

Note:-

Minimum qualifications for the above posts have already been prescribed in the Service Rules notified vide Government of Khyber Pakhtunkhwa Elementary and Secondary Education Department Notification No. SO (PE) 4-5/SSRC/Meeting/2012/Teaching Cadre Dated the November 13, 2012.

*[Signature]* 21/1/2013  
Dy. Director (Estab)  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar.

2543-45

Endst: No. / File No. 1/A-83/KC/S.list : Dated Peshawar the 28/01/2013.

- Copy forwarded for information and necessary action to the:-
1. PS to the Secretary to Govt. Khyber Pakhtunkhwa E&SE Department.
  2. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
  3. M/File

*[Signature]* 21/1/2013  
Dy. Director (Estab)  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar.

*[Handwritten signature]*

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Annex: B<sup>+</sup>  
(19) (16)

Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.

No. 229/11 /A-88/KC/SET(M&F)SL/Inform:

Dated Pesh: 31/8/2012

To  
The Executive Distt: Officer  
Elementary & Secondary Education, Peshawar

SUBJECT: - Guidance for the preparation of seniority lists/promotion/upgradation of various cadres of teaching staff, Distt: Peshawar.

I am directed to refer to your letter No. 11005 dated 23-8-2012 on the subject noted above and to inform you as under:-

1. The seniority cannot be considered from the date of appointment as untrained teacher. The seniority is considered from the date of regular appointment post or from the date of passing the prescribed professional qualification in case of untrained appointment (copy of the Rules attached).
2. The name of the teacher transferred from one district cadre post to other Distt: cadre post on his own request will be placed at the bottom of the seniority list i.e according to the date of taking over charge after the date of issue of his inter Distt: transfer order.
3. The name of the untrained teacher cannot be enlisted in the seniority list unless he passes the prescribed professional qualification.
4. ~~The seniority of the teacher who was transferred to his own District due to devolution of the District Directorate will not be disturbed.~~
5. The new upgraded posts i.e BPS-14, BPS-15 & BPS-16 will be filled by promotion etc. & when the new Service Rules are notified by the Govt: of Khyber Pakhtunkhwa. The notification for constitution of DPC will be issued soon after the new Service Rules.
6. The ACRs/PERs are not required in fixation of pay due to upgradation of scales of PST/Qari teachers (M&F) in BPS-12 as well as upgradation of scale of CT/DM/PET/AT/TA teachers (M & F) in BPS-15. The ACRs will be required for their promotion in next scale against the newly upgraded posts in BPS-14, BPS-15 & BPS-16.
7. The new service rules/ amendment are under process.
8. Before the Service Recruitment Rules 2011, the teachers having FA & F.Sc (in 3<sup>rd</sup> division) already appointed according to the prescribed rules at that time, will be considered for seniority, but their promotion against the newly upgraded posts will be considered if allow the new Service Recruitment Rules which is under process.

*Handwritten note:* handed over to Mr. Khalid Asstt. In-charge

*[Signature]*  
Deputy Director (Establishment)  
(E&S) Khyber Pakhtunkhwa Peshawar

- Endst: No. \_\_\_\_\_
- Copy forwarded for information & necessary action to the:-
1. All the Executive Distt: Officer (E&SE) in Khyber Pakhtunkhwa.
  2. PS to the Secretary to Govt: E&SE Department Khyber Pakhtunkhwa.
  3. PA to the Director E&SE Khyber Pakhtunkhwa

*[Signature]*  
Deputy Director (Establishment)  
(E&S) Khyber Pakhtunkhwa Peshawar

Kohsar Stationery Mart  
Ijmal Bazar BattaGram  
T-310175

Annex: C (17)

FINAL SENIORITY LIST OF AT (M) BATTAGRAM AS STOOD ON 26-09-2018

S. No	Name of Teacher	Father's Name	Name of School	Desig.	B/S	Domicle	Date of Birth	Academ Qualif:	Profess: Qualif:	Dis in BA	1001 <sup>st</sup> Entry into Govt Service	Date of 1/0 Charge Against AT	Date of Regular Appntn AT	Date of 1/0 Charge as regular AT in the District	Remarks
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
1	Lutfullah	Ahmed Rah	GHS Kanar	AT	15	Battagram	02-01-1959	-	Shahadul Aalamia	-	01-01-1984	01-01-1984	01-01-1984	-	Not having basic qualification
2	Abdul Rehman	Harnad Ullah	GHS Gantar Allai	AT	15	Battagram	20/1/1961	-	Shahadul Aalamia	-	15/1/1982	12-09-1985	12-09-1985	-	Not having basic qualification
3	Amir Muhammad	Haji Qalandar Shah	GMS Gangwal	AT	15	Battagram	12-10-1963	-	Shahadul Aalamia	-	25/11/1986	25/11/1986	25/11/1986	-	Not having basic qualification
4	Mehruz Rehman	Haji Kamul	GMS Deshawal	AT	15	Battagram	04-04-1962	-	Shahadul Aalamia	-	25/11/1986	25/11/1986	25/11/1986	-	Not having basic qualification
5	Aftab ur Rehman	Azmatul Khan	GMS Koshgram	AT	15	Battagram	10/10/1964	SSC	Shahadul Aalamia	-	01-04-1989	01-04-1989	01-04-1989	-	Not having basic qualification
6	Larman Shah	Sahib Shah	GMS Ajmera	AT	15	Battagram	04-08-1967	FA	Shahadul Aalamia	-	26/11/1988	21/5/1992	21/5/1992	-	Not having basic qualification
7	Umair Farooq	Shera Khan	GMS Harachai	AT	15	Battagram	19/1/1969	SSC	Shahadul Aalamia	-	19/7/1997	19/7/1997	19/7/1997	-	Not having basic qualification
8	Shah Jahan	Muhammad Hussain	GMS Habbal	AT	15	Battagram	04-09-1979	MA Arabic	Shahadul Aalamia	-	09-01-1997	09-01-1997	09-01-1997	26/12/2012	Not having basic qualification
9	Mumtaz Hussain	Ghulam Nabi	GHS Miran	AT	15	Battagram	03-02-1969	SSC	Shahadul Aalamia	-	15-6-1995	15-6-1995	15-6-1995	27-12-1999	Not having basic qualification
10	Zahoor ul haq	Abdul Qayum	GHS Pihari	AT	15	Battagram	02-01-1972	MA Arabic	Shahadul Aalamia	1st	03-09-1998	03-09-1998	03-09-1998	05-10-1999	BA 3rd Division
11	Hussain Ullah	Mohd Irfanullah	GMS Kakra	AT	15	Battagram	01-09-1965	BA	Shahadul Aalamia	3rd	19-11-1986	19-11-1986	19-11-1986	25-09-2000	BA 3rd Division
12	Ghulam Khan	Abdul Ghaffar	GHS Peshawar Battagram	AT	15	Battagram	04-01-1974	MA	Shahadul Aalamia	1st	09-01-1995	15/3/1998	15/3/1998	16/01-2002	Not having basic qualification
13	Uzaid ur Rehman	Muhammad Abdullah	GMS Isal	AT	15	Battagram	01-10-1976	MA Islamic	Shahadul Aalamia	2nd	25-6-1997	25-6-1997	25-6-1997	26-09-2004	Not having basic qualification
14	Jamil ur Rehman	Ghulam Rabbani	GHS Shamali	AT	12	Battagram	09-05-1969	MA Arabic	Shahadul Aalamia	2nd	01-09-1998	21-09-1998	21-09-1998	21-09-2000	
15	Muhammad haq	Muhammad	GHS Chiman	AT	15	Battagram	12-05-1969	MA	Shahadul Aalamia	1st	16-6-2007	16-6-2007	16-6-2007	16-06-2007	
16	Zahoor Rehman	Uzaid ur Rehman	GMS Muza Danda	AT	15	Battagram	19-4-1976	MA	Shahadul Aalamia	1st	25-09-2007	12-01-2007	12-01-2007		
17	Lutfur Rehman	Muhammad Zahid	GHS Lakha	AT	15	Battagram	05-05-1982	FA	Shahadul Aalamia	-	01-08-2010	01-08-2010	01-08-2010		
18	Rafiq ul Haq	Muhammad Azam	GMS Kanwar	AT	15	Battagram	03-11-1976	MA	Shahadul Aalamia	-	06-01-2011	06-01-2011	06-01-2011		

18

19	Muhammad Bilal	Dahir Azhar	GMS Ghari N/Nand	AT	15	Battagram	01/01/1976	MA (Arabic)	Shahadatul Alama	1st	2002/03	06-06-2011	06-06-2011		
20	Abdul Sattar	Abdul Ghaffar	GHS Parnal Sharif	AT	15	Battagram	01/01/1964		Shahadatul Alama		1984/1988	19/01/1988	19/01/1988	01/06/2012	Not having basic qualification
21	Zai Ur Rehman	Rasool Khan	GMS Hatarang DM	AT	15	Battagram	01/01/1992	BA	Shahadatul Alama S.I.I	1st	17/1/2013	17/1/2013	17/1/2013		
22	Abdul Qayyum	Gul Afzal	GMS Nowshera	AT	15	Battagram	08/08/1982	MA	Shahadatul Alama	1st	03/06/2013	03/06/2013	03/06/2013		
23	Lutfullah	Hussain Ahmad	GMS Hill	AT	15	Battagram	05-06-1982	I.L.B (Hons)	B.A (Shahadatul Alama)		29/07/2016	03-01-2016	03-01-2016		NTS Appointee
24	Muhammad Shah	Fazl Ur Rehman Shah	GMS Kotwal	AT	15	Battagram	27/12/1989	MA (Arabic)			03-01-2016	03-01-2016	03-01-2016		NTS Appointee
25	Zamirah		GMS Bangri Pasbu	AT	15	Battagram	15/3/1985	MA			31/3/2017	31/3/2017	31/3/2017		NTS Appointee
26	Syed Altaf Shah	Syed Sultan Shah	GMS Pazzang	AT	15	Battagram	09-06-1981	MA	B.Ed		31/03/2017	31/03/2017	31/03/2017		NTS Appointee
27	Muhammad Liaqat	Siraj Ahmad	GMS Soopzal	AT	15	Battagram	03-03-1983	MA	Shahadatul Alama		31/03/2017	31/03/2017	31/03/2017		NTS Appointee
28	Akbar Rahman	Muhammad Zafar Khan	GMS Jambra	AT	15	Battagram	01-04-1984	MA	Shahadatul Alama		31/3/2017	31/03/2017	31/3/2017		NTS Appointee
29	Muhammad Waheed	Muhammad Israil	GMS Saidra	AT	15	Battagram	13/4/1990	MA	M.Ed		31/03/2017	31/03/2017	31/03/2017		NTS Appointee
30	Abdul Wali Khan	Hazrat Wahab	GMS Mirani	AT	15	Battagram	04-04-1984	MA Islamiat	Shahadatul Alama		04-01-2017	04-01-2017	04-01-2017		NTS Appointee
31	Hayat Nabil	Abdul Haidar	GMS Jotir	AT	15	Battagram	08/10/1983	MA Islam	B-Ed		31/03/2017	01/04/2017	04-01-2017		NTS Appointee
32	Muhammad Shafiq	Abdus Sattar	GMS Dorkad	AT	15	Battagram	24/10/1986	MA	M Ed		04-01-2017	04-01-2017	04-01-2017		NTS Appointee
33	Sahib Muhammad	Shahid Khan	GMS Dheri Muzakke	AT	15	Battagram	01-11-1991	BA	Shahadatul Alama		04-01-2017	04-01-2017	04-01-2017		NTS Appointee
34	Sanaullah	Fazal Mubid	GMS RoopKani	AT	15	Battagram	04-04-1983	B-Comp			04-01-2017		04-02-2017		NTS Appointee
35	Zahoor Ul Hasan	Muhammad Zafar	GMS Tandol	AT	15	Battagram	15/12/1989	MA Islamiat	M Ed		31/03/2017	04-01-2017	04-01-2017		NTS Appointee

  
 DISTRICT EDUCATION OFFICER (M)  
 BATTAGRAM

WORKING PAPER FOR DEPARTMENTAL PROMOTION OF AT TO SAT  
AT SACTIONED POSTS DULY

65

22



19



OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)  
BATTAGRAM



adeomsecmbattagram@gmail.com

WORKING PAPER FOR DEPARTMENTAL PROMOTION OF AT TO SAT

TOTAL NUMBER OF AT SACTIONED POSTS DULY VERIFIED BY THE DAO	65
1/3 SHARE OF AT POSTS	22
SHARE OF PROMOTION 100%	22
ALREADY PROMOTED	19
NET TO BE PROMOTED	03
PROPOSED FOR PROMOTION	03

LIST OF AT BPS-15 FOR THE PROMOTION AGAINST THE POST OF SAT BPS-16

S.NO	SL NO	NAME OF OFFICIAL	PRESENT PLACE OF POSTING	DATE OF BIRTH	DATE OF APPOINTMENT AS REGULAR TT	WHETHER ELIGIBLE FOR PROMOTION YES/NO	REMARKS
1	1	Lutf ullah	GHS Karai	12/1959	1/1/1984	NO	Having not required Qualification
2	2	Abdur Rahman	GHS Gantar Allai	20/1/1961	9/12/1985	NO	Having not required Qualification
3	3	Amir Muhammad	GMS Gangwal	10/12/1963	25/11/1986	NO	Having not required Qualification
4	4	Mehru Rehman	GMS Deshawal	4/4/1962	25/11/1986	NO	Having not required Qualification
5	5	Alim ur Rehman	GMS Koshgram	30/10/1964	4/1/1989	NO	Having not required Qualification
6	6	Farman Shah	GMS Ajmera	8/4/1967	21/5/1992	NO	Having not required Qualification
7	7	Umar Farooq	GMS Barachar	13/4/1969	19/7/1997	NO	Having not required Qualification
8	8	Shah Jahan	GMS Bishkot	09/04/1979	1/09/1997	YES	
9	9	Mumtaz Hussain	GHS Miran	2/5/1970	15/6/1998	NO	Having not required Qualification
10	10	Zahoor ul haq	GHS Pirhari	1/2/1972	9/3/1998	YES	
11	11	Hussain Ullah	GMS Kaktai	6/1/1965	19/11/1986	NO	Having not required Qualification
12	12	Ghulam Khan	GHS Peshora Battagram	1/4/1974	15/3/1998	YES	

Certificate:

1. It is certified that all the ATS are included in the panel for the promotion against the post of SAT.
2. Hold the post on regular basis and none of them is holding the post on adhoc/acting charge/contract basis.
3. Have completed the required minimum length of qualifying service and qualifications as required for promotion of SAT under the rules.
4. Non of them is on deputation to any organization under the Federal/Provincial/Autonomous/Semi Autonomous/International Organization.
5. Neither any disciplinary /Departmental proceeding/Anticorruption/Judicial Enquiry is pending against them nor have any penalty been imposed upon any one of them during the last five years.
6. No one of them is on long leave/Ex-Pakistan Leave.
7. Their ACRs, Synopsis are free from adverse remarks.
8. They are all alive and serving.
9. Their appointment Orders against AT Post are attached herewith.
10. The seniority list of AT is Final, undisputed and not subjudice.
11. The Departmental Promotion Committee is requested to determine the Suitability of the above ATs for promotion to the post SAT BPS-16 with Immediate effect.

MUHAMMAD SHUKAT  
DISTRICT EDUCATION OFFICER (M)  
BATTAGRAM

**"A"**

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

*Resd*

*TB A 1A*

No.

APPEAL No. *1566* of 20 *19*

*Muf ur Rehman*

Appellant/Petitioner

Versus

*Through Secy, (EGSE)*

RESPONDENT(S)

*Res No 4*

Notice to Appellant/Petitioner

*Shah Jehan AT GHSS  
Thakot Battagram*

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on *17-6-22* at *8:00 AM*.

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

*at camp court  
ATAbad.*

Registrar,

Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

**"A"**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**

JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR.

*Resd*

*TB A 1A*

No.

APPEAL No. *1566* of 20 *19*

*Muf vs Rehman*

Appellant/Petitioner

Versus

*Through Secy, (ESSE)*

RESPONDENT(S)

*Res No 4*

*Shah Jehan AT GHSS*

Notice to Appellant/Petitioner

*Thakot Battagram*

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on *17-6-22* at *8:00 AM*

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

*at camp court*

*A-Abad*

Registrar,

Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.



22 A 22

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

No.

APPEAL No. .... of 20 .....

Appellant/Petitioner

Versus

RESPONDENT(S)

APPEAL No. .... of 20 .....

The appeal has been fixed for preliminary hearing  
before the Tribunal on the said date and at the said  
time. The appellant is directed to appear before the Tribunal  
on the said date and time and to present his case, failing  
which the appeal shall be dismissed in default.

The appeal has been fixed for preliminary hearing  
before the Tribunal on the said date and at the said  
time. The appellant is directed to appear before the Tribunal  
on the said date and time and to present his case, failing  
which the appeal shall be dismissed in default.

Registrar  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar

**"A"**

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

Regd  
No.

TR A/A

APPEAL No.....1506..... of 20 19.

Utff ur Rehman

Appellant/Petitioner

Versus

Through Secy, (ESSE) Pesh

RESPONDENT(S)

Notice to Appellant/Petitioner *Counsel* Humayun Khan (Advocate)  
High Court A/Abad

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 17-6-22 at 8:00 AM.

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

at court  
A/Abad.

Registrar,

Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.