

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

Service Appeal No.1423/2017

Date of Institution ... 22.12.2017  
Date of Decision ... 07.11.2022

Mr. Fakhar Ul Abrar, Subject Specialist (Islamiyat), Government Higher Secondary School, Sandoi Puran, District Shangla.

... (Appellant)

**VERSUS**

The Government of Khyber Pakhtunkhwa through Secretary, E&SE Department, Khyber Pakhtunkhwa, Peshawar and nine others.

... (Respondents)

Noor Muhammad Khattak,  
Advocate

... For appellant.

Naseer Ud Din Shah,  
Assistant Advocate General

... For respondents.

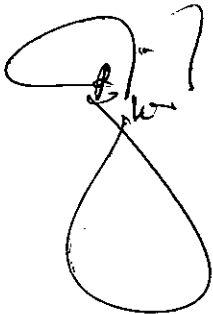
Mrs. Rozina Rehman  
Miss Fareeha Paul

... Member (J)  
... Member (E)

**JUDGMENT**

**ROZINA REHMAN, MEMBER (J):** The appellant has invoked the jurisdiction of this Tribunal through above titled appeal with the prayer as copied below:

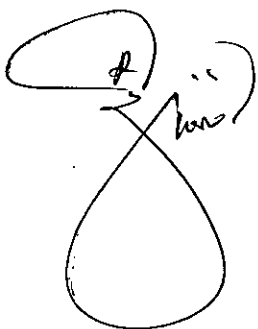
**"That on acceptance of this appeal the impugned notification dated 11.05.2017 may kindly be modified/amended and the appellant may be promoted to the post of Subject Specialist (BPS-17) w.e.f the date when the private respondents No. 4 to 10 were promoted i.e. 17.03.2016 with all back benefits including seniority".**



2. Brief facts of the case are that appellant was serving the department as SST (Islamiyat); his record was forwarded to respondent No. 2 for promotion to the post of Subject Specialist (BPS-17) being senior most employee of the department. He was astonished to see notification vide which junior to the appellant i.e respondents 4 to 10 were promoted to the post of Subject Specialist, while the appellant who was senior was ignored without any reason and justification. Feeling aggrieved he filed departmental appeal and as a result he was promoted to the post of SS on 11.05.2017 with immediate effect instead of from the date when his colleagues were promoted i.e 17.03.2016. Again feeling aggrieved he filed departmental appeal which was not responded to, hence the present service appeal.

3. We have heard Noor Muhammad Khattak, Advocate learned counsel for the appellant and Naseer Ud Din Shah, learned Assistant Advocate General for respondents and have gone through the record and the proceedings of the case in minute particulars.

4. Noor Muhammad Khattak Advocate, learned counsel for the appellant argued that the impugned notification dated 11.05.2017 was against law, facts and norms of natural justice hence not tenable and needed to be modified; that appellant was not treated by respondents in accordance with law and rules and as such they violated Article 4 & 25 of Constitution of Islamic Republic of Pakistan 1973. He contended that the act of the respondents by allowing the promotion to the appellant with immediate effect instead of from the date when his juniors colleagues were promoted was discriminatory in nature and it was clear violation of rules and regulation. Lastly, he submitted that appellant being senior was entitled to promotion from the date when his



juniors were promoted, therefore, he might be granted ante-dated promotion and impugned notification might be modified accordingly.

5. Conversely, learned AAG submitted that the appellant did not bother to submit ACRs/PERs despite repeated letters and correspondence, therefore, he was deferred from promotion against the post of Subject Specialist (Islamiyat) in BPS-17 and that after completion of all codal formalities, he was promoted to the post of Subject Specialist with immediate effect under the provision of Esta Code read with Appointment, Promotion & Transfer Rules, 1989.

6. From the record it is evident that seniority of the present appellant was not disputed. He was serving as SST (BPS-16) and was senior to private respondents 3 to 10. It was on 17.03.2016, when his juniors i.e private respondents were promoted alongwith others to the post of Subject Specialist (BPS-17) on regular basis with immediate effect. Appellant was ignored, rather deferred. Despite directions, respondents failed to submit minutes of Departmental Promotion Committee in order to check as to why the appellant was ignored and was not promoted alongwith his colleagues. It was on 11.05.2017 when appellant alongwith 18 others were promoted to the post of Subject Specialist (BPS-17) on regular basis but with immediate effect which notification made the appellant aggrieved because his juniors had been promoted on 17.03.2016. Nothing in black and white was produced by the respondents in order to show any fault on the part of appellant. From the comments it is evident that the non-submission of ACRs/PERs was made a reason for deferment of the appellant for promotion. Deferment is neither a punishment nor a final order; as and when the




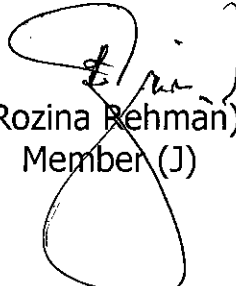
reasons for deferment ceases to exist, the employee is to be promoted from the date when his juniors were promoted.

7. As per Explanation to Rule-17 of the Khyber Pakhtunkhwa Civil Servants (APT) Rules, 1989, if a junior person in a lower post is promoted to a higher post by superseding a senior person and subsequently that senior person is also promoted the person promoted first shall rank senior to the person promoted subsequently; provided that junior person shall not be deemed to have superseded a senior person if the case of the senior person is deferred for the time being for want of certain information or for incompleteness of record or for any other reason not attributing to his fault or demerit. In the instant case, the present appellant was promoted but with immediate effect.

8. In the absence of any solid reason and convincing response by the respondents, the claim of the appellant is bonafide and just and he is held entitled for promotion to the post of Subject Specialist w.e.f 17.03.2016 i.e. the date his juniors were promoted. With the observations herein-above, the appeal in hand is hereby disposed off. File be consigned to the record room.

ANNOUNCED  
07.11.2022

  
(Fareeha Paul)  
Member (E)

  
(Rozina Behman)  
Member (J)

**ORDER**

07.11.2022

Appellant present through counsel.

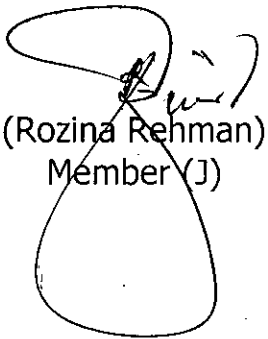
Naseer Ud Din Shah learned Assistant Advocate General for respondents present. Arguments heard. Record perused.

Vide our detailed judgment of today of this Tribunal placed on file, instant service appeal is accepted as prayed for. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED.

07.11.2022

  
(Fareeha Paul)  
Member (E)

  
(Rozina Rehman)  
Member (J)

05.09.2022

Due to leave of the Worthy Chairman, the Bench is incomplete. Case to come up for the same on 07.11.2022 before the D.B.

Reader

*Handwritten notes:*  
13-8-22  
The case is adjourned to  
the 13th of August 2022  
at the discretion of the Bench

27.11.2021

Proper D.B is not available, therefore, case is adjourned to 28 / 2 / 2022 for the same as before.

  
Reader

28-2-22

Due to Retirement of the Honorable Chairman the case is adjourned on

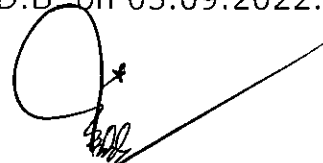
13-6-22


  
Reader

13.06.2022

Clerk of counsel for the appellant present. Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.

Clerk of counsel for the appellant stated that learned counsel for the appellant is unable to attend the Tribunal today due to strike of Lawyers. Adjourned To come up for arguments before the D.B. on 05.09.2022.

  
(MIAN MUHAMMAD)  
MEMBER (EXECUTIVE)

  
(SALAH-UD-DIN)  
MEMBER (JUDICIAL)

07.06.2021

Clerk of counsel for the appellant present. Muhammad Adeel Butt, learned Additional Advocate General for the respondents present.

Clerk of counsel for the appellant sought adjournment on the ground that counsel for the appellant is not available today due to general strike on the call of Khyber Pakhtunkhwa Bar Council. Adjourned. To come up for arguments before the D.B on 16.09.2021.



(ATIQ UR REHMAN WAZIR)  
MEMBER (E)



(SALAH-UD-DIN)  
MEMBER(J)

16.09.2021

Mr. Noor Muhammad Khattak, Advocate, for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present and requested for adjournment on the ground that the brief of the instant appeal was assigned to Mr. Riaz Ahmed Paindakheil, Assistant Advocate General, however he has proceeded for offering of funeral. Adjourned. To come up for arguments before the D.B on 24.11.2021.



(ATIQ-UR-REHMAN WAZIR)  
MEMBER (EXECUTIVE)



(SALAH-UD-DIN)  
MEMBER (JUDICIAL)

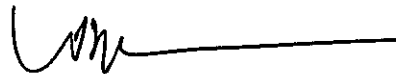


09.10.2020

Counsel for appellant present.

Mr. Muhammad Jan learned Deputy District Attorney for respondents present.

Former requests for adjournment. Adjourned with direction to counsel appellant to submit Member Copy of the instant case. To come up for arguments on 03.12.2020 before D.B.



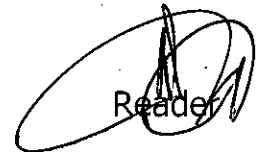
(Atiq ur Rehman Wazir)  
Member (E)



(Rozina Rehman)  
Member (J)

03.12.2020

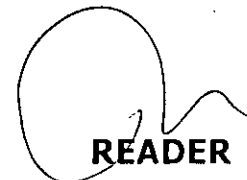
Due to COVID-19, the case is adjourned to 04.03.2021 for the same as before.



Reader

04.03.2021

Due to COVID-19, the case is adjourned for the same on 07.06.2021 before D.B

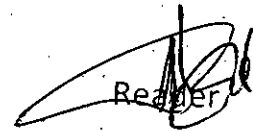


**READER**

4.5 .2020

Due to COVID19, the case is adjourned to

15/7 /2020 for the same as before.

  
Reader

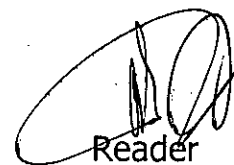
15.07.2020

Due to COVID19, the case is adjourned to 25.08.2020 for  
the same as before.

  
Reader

25.08.2020

Due to summer vacation case to come up for the  
same on 09.10.2020 before D.B.

  
Reader

09.12.2019

Clerk to counsel for the appellant present. Addl: AG for respondents present. Clerk to counsel for the appellant seeks adjournment due to general strike of the Bar. Adjourned. To come up for arguments on 06.02.2020 before D.B.

  
Member

  
Member

06.02.2020

Counsel for the appellant present. Mr. Usman Ghani, District Attorney for respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 04.03.2020 before D.B.

  
Member

  
Member

04.03.2020

Counsel for the appellant present. Addl: AG alongwith Mr. Irfan, Assistant for respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 04.05.2020 before D.B.

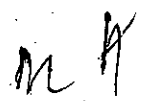
  
Member

  
Member

11.09.2019


Junior to counsel for the appellant present. Asst. AG for respondents present. Junior to counsel for the appellant seeks adjournment as senior counsel was busy before the august High Court, Peshawar. Adjourned. Last opportunity granted for arguments. To come up for arguments on 12.09.2019 before D.B.


  
(Ahmad Hassan)  
Member

  
(M. Amin Khan Kundi)  
Member

12.09.2019

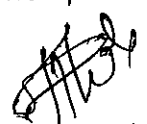
Counsel for the appellant and Mr. Riaz Ahmad Paindakheil, Assistant AG for official respondents No. 1 & 2 present. None present on behalf of private respondent No. 3, therefore, he is proceeded ex-parte. Private respondents No. 4 to 10 have already been proceeded ex-parte vide order sheet dated 18.02.2019. Case to come up for arguments on 25.10.2019 before D.B.

  
(Ahmad Hassan)  
Member

  
(M. Amin Khan Kundi)  
Member

25.10.2019

Learned counsel for the appellant present. Mr. Zia Ullah learned Deputy District Attorney for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 09.12.2019 before D.B.

  
(Hussain Shah)  
Member

  
(M. Amin Khan Kundi)  
Member

15.04.2019

Counsel for the appellant and Mr. Muhammad Jan, Deputy District Attorney for official respondents No. 1 & 2 present. Learned counsel for the appellant seeks adjournment. Adjourned to 31.05.2019 for rejoinder and arguments before D.B.


  
(HUSSAIN SHAH)  
MEMBER

  
(M. AMIN KHAN KUNDI)  
MEMBER

31.05.2019

Counsel for the appellant and Mr. Muhammad Jan learned Deputy District Attorney for the respondents present. Counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 12.07.2019 before D.B.

  
(Hussain Shah)  
Member

  
( M. Amin Khan Kundi)  
Member

12.07.2019

Counsel for the applicant and Mr. Ziaullah, DDA alongwith Mr. Irfan, Assistant for respondents present. Counsel for the applicant seeks adjournment. Adjourned. Case to come up for arguments on 11.09.2019 before D.B.

  
Member

  
Member


**Service Appeal No. 1423/2017**


**31.12.2018**

Counsel for the appellant present. Mr. Razeem, AD alongwith Mr. Kabirullah Khattak, Additional AG for official respondents No. 1 & 2 present and submitted written reply. Private respondent No. 3 has already submitted his written reply. None present on behalf of private respondent No. 4 to 10 therefore, notice be issued to them for attendance and filing of written reply. Adjourned. To come up for written reply/comments on 18.02.2019 before S.B.

  
**Muhammad Amin Khan Kundi**  
**Member**

**18.02.2019** Learned counsel for the appellant and learned Additional Advocate General for the respondents present. Nemo for respondents No.4 to 10.

 On the last date of hearing respondents No.4 to 10 were required to be served for hearing today. The record shows that they had been sent notices through registered post on 15.01.2019. None of the said respondents is present today, therefore, are placed ex-parte. To come up for arguments before D.B on 15.04.2019. The appellant may submit rejoinder to the reply submitted by the respondents No.1 to 3 within a fortnight, if so desires.

  
**Chairman**

07.08.2018

Appellant is absent, however, Mr. Noor Muhammad Khattak, Advocate counsel for the appellant present. Mr. Kabirullah Khattak, Addl. AG for respondents present and made a request for some time to submit written reply/comments. Granted but as a last chance. Case to come up for written reply/comments on 26.09.2018 before S.B.

  
Chairman

26.09.2018

Mr. Mir Zaman, Junior to counsel for the appellant present. Mr. Kabirullah Khattak, Addl. AG for the respondents present and requested for adjournment: Granted. To come up for written reply/comments on 14.11.2018 before S.B.

*Private respondent no. 3  
submitted reply which is placed on file*

  
Chairman

14.11.2018

Due to retirement of Hon'ble Chairman, the Tribunal is defunct. Therefore, the case is adjourned. To come up on 31.12.2018. Written reply not received. Mr. Hameed Ur Rehman AD representative of respondents absent.

  
READER

**17.04.2018** Junior counsel for the appellant and Addl: AG present. None present on behalf of respondent department. Therefore, fresh notices be issued to the respondent department to attend the court positively. Written reply not submitted. Requested for adjournment. Adjourned. To come up for written reply/comments on **02.05.2018** before S.B.

  
Member

**02.05.2018** Junior counsel for the appellant and Mr. Kabirullah Khattak, Additional AG for official respondents present. The Tribunal is non-functional due to retirement of our Hon'ble Chairman. Therefore, the case is adjourned. To come up for same on 25.06.2018.

  
Reader

**25.06.2018** Appellant absent. However his counsel present. Mr. Muhammad Jan, DDA for the respondents present. Written reply not submitted on behalf of respondents. Learned DDA seeks time for reply. Adjourned. To come up for written reply/comments on 07.08.2018 before S.B.

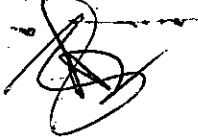
  
Chairman




16.02.2018

Counsel for the appellant present. Preliminary arguments heard. It was contended by learned counsel for the appellant that the appellant was serving in Education Department as SST BPS-16. It was further contended that the private respondents junior colleagues of the appellant was promoted from SST (BPS-16) to Subject Specialist (BPS-17) vide order dated 17.03.2016 while the appellant is senior to the private respondents but has been promoted from SST (BPS-16) to Subject Specialist (BPS-17) vide order dated 11.05.2016 with immediate effect therefore, It was contended that the appellant was also entitled for ante-date promotion and the promotion order of the appellant vide order dated 11.05.2016 is liable to be rectified.

Appellant Deposited  
Security & Process Fee



The contentions raised by learned counsel for the appellant need consideration. The appeal is admitted for regular hearing subject to deposit of security and process fee within 10 days, thereafter notice be issued to the respondents for written reply/comments for 02.04.2018 before S.B.

  
(Muhammad Amin Khan Kundi)  
Member

02.04.2018

Clerk of the counsel for appellant and Additional: AG for the respondents present. Written reply not submitted. Requested for adjournment. Adjourned. To come up for written reply/comments on 17.04.2018 before S.B.



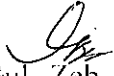
  
(Ahmad Hassan)  
Member

Form-A

FORM OF ORDERSHEET

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

Case No. 1423/2017


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	29/12/2017	<p>The appeal of Mr. Fakhr-ul-Abrar resubmitted today by Mr. Noor Muhammad Khattak Advocate may be entered in the Institution Register and put up to Worthy Chairman for proper order please.</p> <p style="text-align: right;">   REGISTRAR 29/12/17 </p>
2-	04/01/18.	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>19/01/18.</u></p> <p style="text-align: right;">   CHAIRMAN </p> <p>19.01.2018</p> <p>Counsel for the appellant present and seeks adjournment. Adjourned. To come up for preliminary hearing on 16.02.2018 before S.B.</p> <p style="text-align: right;">   (Gul Zeb Khan)  Member (E) </p>

The appeal of Mr. Fakhr-ul-Abrar Subject Specialist GHSS Sandoi Puran Shangla received today i.e. on 22.12.2017 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Annexures of the appeal may be flagged.
- 2- Annexures of the appeal may be attested.
- 3- Annexures of the appeal are illegible which may be replaced by legible/better one.
- 4- Twelve more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 2735 /S.T,

Dt. 26/12 /2017


  
REGISTRAR 26/12/17  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Noor Muhammad Khattak Adv. Pesh.

Note:-

Sir,

All objections has been removed  
hence (re-submitted today dated 29.12.2017)

  
29/12

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

APPEAL NO. 1423 /2017

**FAKHR UL ABRAR**

**VS**

**GOVT. OF KP & OTHERS**

**INDEX**

<b>S.NO.</b>	<b>DOCUMENTS</b>	<b>ANNEXURE</b>	<b>PAGE</b>
1.	Memo of appeal	.....	1 - 4
2.	Letter dated 30-07-2015	<b>A</b>	5
3.	Notification dated 17-03-2016	<b>B</b>	6 - 7
4.	Seniority List	<b>C</b>	8 - 10
5.	Departmental Appeal dated 21-03-2017	<b>D</b>	11
6.	Forwarding Letter dated: 22-03-2017	<b>E</b>	12
7.	Notification dated: 11-05-2017	<b>F</b>	13-14
8.	Departmental Appeal dated 23-08-2017	<b>G</b>	15
9.	Forwarding Letter: 24-08-2017	<b>H</b>	16
10.	VakalataNama	--- --	15/17

**APPELLANT**

**THROUGH:**

  
**NOOR MOHAMMAD KHATTAK**  
**ADVOCATE**

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

**APPEAL NO. 1423 /2017**

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 1449

Dated 22-12-2017

Mr. Fakhir ul Abrar, Subject Specialist (Islamiyat),  
Govt. Higher Secondary School, Sandoi Puran, District Shangla.

**APPELLANT**

**VERSUS**

- ✓ 1- The Govt. of Khyber Pakhtunkhwa through Secretary, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
- ✓ 2- The Director, Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
- ✓ 3- Mr.Fazal Rehman (SS), Govt. Higher Secondary School, Ibrahimzai, Hangu.
- ✓ 4- Mr.Khurshid Iqbal (SS), Govt. Higher Secondary School, Sheikhan, Peshawar.
- 5- Mr.Mohammad Irfan (SS), Govt. Higher Secondary School, Landi Kachi, Kohat.
- 6- Mr.Basheer Ullah (SS), Govt. Higher Secondary School, Dubiyan, Swabi.
- ✓ 7- Mr.Aziz ur Rehman (SS), Govt. Higher Secondary School, Gul Imam, Tank.
- 8- Mr.Tariq Mehmood (SS), Govt. Higher Secondary School, Adezai, Peshawar.
- ✓ 9- Mr.Jamsheed Khan (SS), C/o Director Education (FATA), Warsak Road, Peshawar.
- ✓ 10- Mr.Riaz Khan (SS), Govt. Higher Secondary School, Mailazai, Tank.

**RESPONDENTS**

Filed to-day

Registrar

**APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974, AGAINST THE IMPUGNED PROMOTION NOTIFICATION DATED 11-05-2017 WHEREBY THE APPELLANT HAS BEEN PROMOTED TO THE POST OF SUBJECT SPECIALIST (BPS-17) WITH IMMEDIATE EFFECT RATHER THAN WITH RETROSPECTIVE EFFECT I.E. 17.3.2016 AND AGAINST NO ACTION TAKEN ON THE DEPARTMENTAL APPEAL OF THE APPELLANT DATED 23-08-2017 WITHIN THE STATUTORY PERIOD OF 90 (NINETY) DAYS**

Re-submitted to-day  
and filed.

Registrar 22/12/17

**PRAYER:**

**That on acceptance of this appeal the Impugned Notification dated 11-05-2017 may kindly be modified/amended and the appellant may be promoted to the post Subject Specialist (BPS-17) w.e.f. the date when the private respondent no. 4 to 11 were promoted i.e. 17-03-2016 with all back benefits including seniority. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.**

**R/SHEWETH:**

**ON FACTS:**

1. That the appellant is the employee of the respondent Department and is serving the respondent Department quite efficiently and up to the entire satisfaction of his superiors.
2. That appellant while serving the respondent Department as SST (BPS-16) his service record was forwarded vide letter dated 30.07.2015 to the respondent No.2 for promotion to the post of subject specialist (BPS-17) being senior most employee of the respondent Department. That appellant was quite hopeful for his promotion to the post of Subject Specialist (BPS-17). Copy of the letter is attached as annexure ..... **A.**
3. That the appellant was astonish to see Notification dated 17-03-2016 where by junior to the appellant i.e. respondents No. 4 to 11 were allowed/given promotion to the post of Subject Specialist (BPS-17) while the appellant who is senior to private respondents has been completely ignored without any reason and clear justification. Copies of the Notification dated 17-03-2016 and seniority list are attached as annexure ..... **B&C.**
4. That the appellant feeling aggrieved from the Notification dated 17.3.2016 preferred Departmental appeal and in result vide impugned Notification dated 11.5.2017 the appellant was promoted to the post of Subject specialist (BPS-17) but with immediate effect rather with retrospective effect i.e. w.e.f. the date when appellant colleagues and junior colleagues were promoted (17.3.2016). Copies of Departmental Appeal, letter and impugned Notification dated 11.5.2017 are attached as annexure ..... **D, E&F.**

5. That, the appellant feeling aggrieved from the impugned notification dated 17-05-2017 preferred Departmental Appeal dated 23-08-2017 which was properly forwarded to respondent no. 2 by respondent no. 3 vide its forwarding letter dated 24-08-2017 but the same is not responded by the appellate authority till date. Copies of Departmental Appeal & letter are attached as annexure ..... **G&H.**
6. That appellant feeling aggrieved and having no other remedy filed the instant appeal on the following grounds amongst the others.

**GROUND:**

- A- That the impugned notification dated 11-05-2017 issued by the respondent No.1 is against the law, facts, norms of natural justice & material on record hence not tenable and needs to be modified/corrected accordingly.
- B- That appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That the act of the respondents by allowing promotion to the appellant with immediate effect rather than with retrospective effect is discriminatory in nature and involve malafide on the part of the respondents.
- D- That the impugned Notification dated 11-05-2017 whereby the appellant was promoted to the post of SS (BPS-17) with immediate effect rather than with retrospective effect is the clear violation of the rules and regulations laid down for the subject matter and as such the same is not tenable and liable to be amended/ modified.
- E- That appellant is fully entitled for ante dated promotion and as such the impugned Notification, dated 11.5.2017 is not tenable in the eye of law and Rules hence liable to be modified, accordingly.
- F- That appellant has the due right of ante dated promotion to the post of SS (BPS-17) in light of section 9 of the Civil Servant Act 1973 read with Rule 7 of the Appointment Promotion & Transfer Rules 1989.

G- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore, most humbly prayed that the appeal of the appellant may very graciously be accepted as prayed for, please.

Dated: 20-12-2017

**APPELLANT**



**FAKHR UL ABRAR**

**THROUGH:**



**NOOR MOHAMMAD KHATTAK**

**&**



**MUHAMMAD MAAZ MADNI  
ADVOCATES**





5

Annexure - (A)

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) SHANGLA  
AT ALPURAI

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


Dated 30/07/2015

No. 9395

MOVEMENT ORDER.

Mr. Alami Rashid Senior Clerk of this office is hereby deputed to Peshawar to submit the SST promotion to SS files of the following teachers through special messenger to the office of the director (E & SE) Shangla today on 29/07/2015, and to bring PTC training books from Wali Khan Deputy Director (P & D) Pakhtunkhwa.

- 1) Ahmad Hilal SST Science GHS Puran (Chemistry)
- 2) Fakhrul Abrar SST General GHS Gharai Kandav. (Islamiat, Arabic)
- 3) Qasim Shah ADO Primary Butyal Circle (Islamiat)
- 4) Fahim Jan SST General GMS Bilkanai (Islamiat)
- 5) Muhammad Saeed Ullah SST General GHS Damorai. (Islamiat).

  
District Education Officer (M),  
Shangla

ATTESTED



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Annexure B



GOVERNMENT OF KHYBER PAKHTUNKHWA  
PRIMARY & SECONDARY EDUCATION  
DEPARTMENT

Dated Peshawar (16-03-2016)

NOTIFICATION

No. SO/PE/2-6/DFC Meeting/SSI-SS (29/10/2015) On the recommendations of the Departmental Promotion Committee, the Competent Authority is pleased to promote the following Seven Hundred and Thirty Seven (737) Male SSTs (BS-16) to the post of Subject Specialist (BS-17) on regular basis with immediate effect:-

SN	SN in Subject	SL#	Name and Qualification	Present school Address	Proposed Station	Remarks
1	1	746	Sikandar Khan	GHS Fakhra Ghulam Peshawar	SS B-17 (Biology) GHSS Tekkal Dol Peshawar	Against vacant post
2	2	1370	Zeenat Ullah SET M. Ed	GHS Mirza Khel Karak	SS B-17 (Biology) GHSS Habb Lawaghar Karak	Against vacant post
3	3	1813	Mr Sultan Farooq, SET	GHS Nawab Jan Hala Khel FR Bannu	Services placed at the disposal of Director Education FATA	Against vacant post
4	4	1871	Mr Akhtar Nawaz Khan MSc.M.Ed	GCMHS Tardad Dir Upper	SS B-17 (Biology) GHSS Jati Pind, Haripur	Against vacant post
5	5	2751	Mr. Muhammad Fayaz Shah SET	GHS Raghobai Mangocher	SS B-17 (Biology) GHSS Rastakaf, Nowshera	Against vacant post
6	6	2768	Mr. Yousaf Zaman, SET	GHS Jan R. Dir Dera	SS B-17 (Biology) GHSS Nari Panoos, Karak	Against vacant post
7	7	2775	Mr. Usman Baldar, SER	GHSS Barkot Swat	SS B-17 (Biology) GHSS Kishawra, Swat	Against vacant post
8	8	2799	Mr. Janat Gul, SET	GHSS Khaput Dir Lower	SS B-17 (Biology) GHSS Asbar Dir Lower	Against vacant post
9	9	2894	Mr. Bakht Shah, SET	GHSS Semi Haripur Lakki	SS B-17 (Biology) GHSS Akhul Khel, Lakki	Against vacant post
10	10	2965	Muhammad Altaf ur Rehman SET MSc BEd	GHS Dhanuba Haripur	SS B-17 (Biology) GHSS Beer Haripur	Against vacant post
11	11	3063	Bukhar Ali Shah S/O Zardad Khan MSc MEd Bannu	GHS Tour Dera Khel Bannu	SS B-17 (Biology) GHSS Choraki, Kohat	Against vacant post
12	12	3302	Amir Alam Khan S/O Gul Mohar mad Dir, MSc, BEd	GHS Hotham Mangocher	SS B-17 (Biology) GHSS Dir S/O Mangocher	Against vacant post
13	13	3858	Fazl Subhan S/O Gul Khim MSc, MEd	GHS Jati Swat	SS B-17 (Biology) GHSS Jati Swat	Against vacant post
14	14	4138	Syed Asif Hussain Shah SET MA B.Ed	GHS Talamia Mangocher	SS B-17 (Biology) GHSS Dera, Mangocher	Against vacant post
15	15	4554	Sajid Hussain SET B.A/B.Ed	GHS Chakarbel Kot Dhar Kohat	SS B-17 (Biology) GHSS Uchil Pind, Kohat	Against vacant post
16	16	4558	Mehboob Alam SET M.Sc/M.Ed	GHS Kot Karanda Dir Upper	SS B-17 (Biology) GHSS Shabhar, Khel	Against vacant post
17	1	520	Nasrullah BA BEd	GHS Mantawa Karak	SS B-17 (Chemistry) GHSS Rosh Khel Karak	Against vacant post
18	2	534	Luqman ali MSc BEd	GHS Khazam Dera Mardan	SS B-17 (Chemistry) GHSS Mahabar, Atok, Mardan	Against vacant post
19	3	564	Hassanul Haq MSc BEd	GHS Shergash Mangocher	SS B-17 (Chemistry) GHSS Shergash, Mangocher	Against vacant post
20	4	569 A	Muhammad Iqbal SET MSc M.Ed	GHS Quch, Dir Lower	SS B-17 (Chemistry) GHSS Jaldara, Dir Lower	Against vacant post
21	5	579	Zeenullah MSc BEd	GHS Saar Kanan, Peshawar Khyber Agency	SS B-17 (Chemistry) GHSS Shah Salcan Karak	Against vacant post

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709	75	1681	Ahmad Mawer SET MA B Ed	GHS Khan Dara, Dir Upper	SS B-17 (Islamiyat) GHSS Gandigar, Dir Upper(Rid:13.01.16)	Against vacant post
710	76	1688	Sahibul Haq SET	GHS Lahore Colony Mardan	SS B-17 (Islamiyat) GHSS Chantalai, Swat	Against vacant post
711	77	1692	Shamimullah SET	GHS No.3 Kohat	SS B-17 (Islamiyat) GHSS Muslim Abad Kohat	Against vacant post
712	78	1707	Karim Nawaz SET	GHSS Gul Imam Tank	SS B-17 (Islamiyat) GHSS Gomal Bazar, Tank	Against vacant post
713	79	1714	Hameedullah SET	GHS No 1 Nowshera Camp	SS B-17 (Islamiyat) GHSS Nesatta, Charsadda	Against vacant post
714	80	1715	Abdur Razaq SET	GHS Battagram	SS B-17 (Islamiyat) GHSS Mera Mada Kheil, Toghbari	Against vacant post. His date of birth is 06.03.1956 and he has retired on superannuation basis on 05.03.2016, while the DPC was held on 20.10.2015 thus he is promoted w.e.f. date of DPC, in light of Establishment Department Instructions SO(R- VI)E&AD1-16-2005 dated 22.03.2006
715	81	1720	Muhammad Zulfajar SET	GHS No.2 Kohat	SS B-17 (Islamiyat) GHSS Muhammad Zar, Kohat	Against vacant post
716	82	1721	Raza Khan SET	GHS Shewa Swabi	SS B-17 (Islamiyat) GHSS Jangar Buner	Against vacant post
717	83	1724	Muhammad Iqbal SET	GHS Khudal Peshawar	SS B-17 (Islamiyat) GHSS Unurzan, Charsadda	Against vacant post
718	84	1728	Ayub Khan SET MA MED	GHSS Peshawar Chamkam	SS B-17 (Islamiyat) GHSS Jabbi Nowshera	Against vacant post
719	85	1735	Ghulam Rasool	GHS No. 1 Bilal Gung Mardan	SS B-17 (Islamiyat) GHSS No.1 Bilal Gung Mardan	Against vacant post
720	86	1736	Muhammad Lalal, B.A. Bed	GHS No 1 Mardan	SS B-17 (Islamiyat) GHSS Manga, Mardan	Against vacant post
721	87	1743	Shamsun Nisar	GHS Lahore Colony Mardan	SS B-17 (Islamiyat) GHSS Boobak, Charsadda	Against vacant post
722	88	1763	Akmalzeb	GHS Chahiga Swat	SS B-17 (Islamiyat) GHSS Balogram, Swat	Against vacant post
723	89	1858	Mr. Fazal Malik BSC B Ed SET	GHSS Baghicha Dheri Mardan	SS B-17 (Islamiyat) GHSS Nogram, Buner	Against vacant post
724	90	1862	Mr. Khan Babshah BSC MED SET	GHS Babuzai Mardan	SS B-17 (Islamiyat) GHSS Dokada Buner	Against vacant post
725	91	1914	Mr. Fazal Behman MA MED SET	GHS No.2 Hangu	SS B-17 (Islamiyat) GHSS Ibrahimzai, Hangu	Against vacant post
726	92	1987	Mr. Khurshid Iqbal BA BEd SET	GHS Landi Arbab Peshawar	SS B-17 (Islamiyat) GHSS Sherikhan, Peshawar	Against vacant post
727	93	2019	Mr. Muhammad Iqbal MA B Ed SET	GHS No 1 Kohat	SS B-17 (Islamiyat) GHSS Landi Kaehn, Kohat	Against vacant post
728	94	2039	Mr. Raheemullah BSC B Ed SET	GHSS Doban Swabi	SS B-17 (Islamiyat) GHSS Doban Swabi	Against vacant post
729	95	2056	Mr. Azam Behman s/o Karim Bukhsh MA MED SET	GHS No 2 Tank	SS B-17 (Islamiyat) GHSS Gul Imam, Tank	Against vacant post
730	96	2073	Mr. Faraj Mahmood BSC B Ed SET	GHS No.1 Peshawar Cny	SS B-17 (Islamiyat) GHSS Adezai Peshawar	Against vacant post
731	97	2090	Mr. Jansheed Khan MA B Ed SET	GHS Subhan Khwar, Mohammad Agency	Services placed at the disposal of Director Education FATA	Against vacant post
732	98	2137	Mr. Riaz Khan Sr. B.A. Ed	GHS Hajal Noorhaz Banara	SS B-17 (Islamiyat) GHSS Murtazai, Tank	Against vacant post

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Annexure-C

188	1627	1707	Karim Nawan	16.04.1971	28.03.1996
189	2326	1710	Attaullah	10.04.1967	28.03.1996
190	1069	1712	Muhammad Hammad	20.04.1965	28.03.1996
191	1846	1714	Hamid Ullah	17.09.1967	28.03.1996
192	1722	1720	Muhammad Zulfiqar	11.04.1967	28.03.1996
193	763	1728	Ayub Khan	15.01.1966	28.03.1996
194	443	1735	Ghulam Rabbani	15.01.1965	28.03.1996
195	444	1736	Muhammad Tufail	11.09.1967	28.03.1996
196	445	1737	Siraj ul Islam	01.04.1965	28.03.1996
197	1073	1739	Muhammad Sulaiman	13.09.1966	28.03.1996
198	446	1745	Shams un Nisar	15.05.1966	28.03.1996
199	761	1757	Murad Ali Shah	04.05.1966	28.03.1996
200	2800	1763	Alamzeb	01.05.1967	28.03.1996
201	447	1765	Ghulam Nabi	08.03.1966	28.03.1996
202	420	1784	Noor ul Hadi	13.01.1961	28.03.1996
203	1059	1785	Muhammad Arif	15.04.1971	28.03.1996
204	1484	Record	Burhan ud Din	28.02.1957	28.03.1996
205	1847	Record	Mazhar Hayat	26.03.1970	01.09.1997
206	2208	1832	Qudrat Shah	24.04.1956	15.01.1998
207	1694	1833	Fakhrul Ibrar ✓	18.05.1965	15.01.1998
208	448	1858	Fazle Malik	10.04.1968	15.01.1998
209	449	1862	Khan Badshah	10.12.1969	15.01.1998
210	450	1866	Faiz ul Qadoos	04.04.1964	15.01.1998
211	235	1877	Muhammad Juma Khan	15.12.1966	15.01.1998
212	2213	1891	Siraj ud Din	01.10.1968	15.01.1998
213	764	1900	Aziz ur Rehman ✓	03.06.1969	15.01.1998
214	1667	Record	Fazal Rehman ✓	09.06.1962	15.01.1998
215	1848	Record	Zai Ahmad	05.11.1967	15.01.1998
216	1849	Record	Ishfaq Ali	25.05.1977	05.04.1999*
217	1850	Record	Fazle Wahid	02.01.1970	07.04.1999
218	451	1967	Muhammad Ali	11.08.1967	26.05.1999
219	871	1978	Muhammad Arif	05.02.1968	26.05.1999
220	1342	2003	Habib Ullah Dotani	07.08.1972	26.05.1999
221	765	2018	Muhammad Faheem	15.02.1968	26.05.1999
222	2477	2028	Akhtar Munir	21.08.1972	26.05.1999
223	2908	2041	Biradar Khan	03.01.1970	26.05.1999
224	1628	2056	Aziz ur Rehman	0.10.1971	26.05.1999
225	1155	2075	Sabir Ahmad Khan	12.03.1974	26.05.1999

ATTESTED



226	2808	2076	Salah ud Din	12.02.1964	26.05.1999
227	2334	2090	Jamshed Khan	25.04.1970	26.05.1999
228	2214	Record	Fazal Wahab	01.01.1968	26.05.1999
229	2594	Record	Uzair Ullah	19.04.1972	04.06.1999
230	1156	2137	Riaz Khan	15.10.1958	12.07.1999
231	2476	2141	Ahmad Hussain	14.04.1957	12.07.1999
232	2475	2145	Harneed Ullah Jan	11.06.1961	12.07.1999
233	606	2148	Fakhrul Hassan	06.03.1963	12.07.1999
234	599	2150	Amir Badshah	15.12.1956	12.07.1999
235	1162	2157	Muhammad Ayaz Khan	02.06.1961	12.07.1999
236	1160	2164	Asmat Ullah Shah	15.05.1965	12.07.1999
237	1852	2184	Muhammad Shahid	06.04.1956	12.07.1999
238	1158	2186	Ghulam Nazir Khan	10.11.1962	12.07.1999
239	1727	2194	Muhammad Zubair	14.02.1957	12.07.1999
240	2187	2201	Noor Zaman	01.05.1963	12.07.1999
241	1159	2203	Usman Ali Khan	04.07.1963	12.07.1999
242	1161	2205	Hafeez Khan	03.12.1966	12.07.1999
243	2185	2206	Muhammad Rasool	07.01.1957	12.07.1999
244	1157	2210	Rashid ur Rehman	21.01.1962	12.07.1999
245	2296	2213	Muhammad Wali Ullah	06.12.1964	12.07.1999
246	2907	2221	Ali Rehman	20.04.1957	12.07.1999
247	1021	2230	Hayan Ullah	15.04.1955	12.07.1999
248	452	2235	Abdul Malik	07.05.1956	12.07.1999
249	453	2238	Shah Pasand Khan	04.09.1956	12.07.1999
250	910	2247	Muhammad Sawez	01.12.1959	12.07.1999
251	2909	2259	Saeed Ullah Jan	07.09.1963	12.07.1999
252	1853	2262	Farooq Shah	11.03.1960	12.07.1999
253	1063	2274	Fazle Manan	01.09.1960	12.07.1999
254	250	2277	Waqar Ahmad	11.11.1961	12.07.1999
255	2780	2280	Umar Haleem	02.04.1959	12.07.1999
256	1020	2290	Sher Wali Khan	16.02.1963	12.07.1999
257	454	2298	Muhammad Zahid	04.12.1965	12.07.1999
258	2871	2303	Rab Nawaz Khan	01.12.1958	12.07.1999
259	1163	2335	Muhammad Ali Khan	04.02.1968	12.07.1999
260	2940	2340	Nazar Muhammad	09.12.1955	12.07.1999
261	2868	2344	Amir Rehman	02.02.1955	12.07.1999
262	1854	2351	Anwar ul Haq	03.05.1956	12.07.1999
263	2867	2371	Farid Khan	15.06.1985	12.07.1999

**ATTESTED**



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454	598	4329	Sher Zaman	15.11.1966	01.09.2004
455	1170	4331	Muhammad Hayat Khan	01.01.1965	01.09.2004
456	602	4332	Gul Bayan	30.01.1963	01.09.2004
457	2192	4339	Pir Dil Khan	20.04.1957	01.09.2004
458	2483	4343	Muhammad Bilal	06.05.1967	01.09.2004
459	1495	4347	Ghulam Hussain	05.01.1965	01.09.2004
460	2810	4372	Fazal Rehman	20.08.1960	01.09.2004
461	2913	4375	Jehanzeb	01.01.1963	01.09.2004
462	1295	4387	Attiq Ullah	30.08.1962	01.09.2004
463	163	4395	Muhammad Rahim	17.02.1963	01.09.2004
464	2874	4404	Abdul Waheed	01.01.1957	01.09.2004
465	2820	4405	Ibrahim Shah	03.02.1957	01.09.2004
466	487	4412	Taj Muhammad	15.02.1957	01.09.2004
467	2804	4415	Bakht Muhammad Khan	03.05.1957	01.09.2004
468	1864	4440	Iftikhar Zaman	10.05.1966	01.09.2004
469	769	4445	Shah Nawaz Khan	15.12.1966	01.09.2004
470	2952	4452	Mushtaq Ahmad	25.02.1964	01.09.2004
471	488	4455	Anwar Ali Shah	20.03.1966	01.09.2004
472	1860	4464	Javed Khan	10.10.1966	01.09.2004
473	489	4467	Esar Ali	08.04.1968	01.09.2004
474	490	4472	Jamshed Khan	15.03.1966	01.09.2004
475	491	4480	Abdul Wakeel	15.09.1955	01.09.2004
476	2399	4510	Malik Mushtaq Ahmad	24.04.1968	01.09.2004
477	2400	4527	Faiz Rasan	06.04.1969	01.09.2004
478	2219	4566	Dilaram Khan	01.01.1967	01.09.2004
479	2220	4574	Gulajan	01.04.1965	01.09.2004
480	492	4587	Khan Bali Shah	01.01.1971	01.09.2004
481	1496	4611	Khaista Muhammad	26.01.1967	01.09.2004
482	162	Record	Bakht Zada	07.05.1962	01.09.2004
483	485	Record	Syed Qayam ud Din	12.12.1957	01.09.2004
484	486	Record	Muhammad Israil	03.05.1955	01.09.2004
485	1494	Record	Muhammad Naeem	14.09.1961	01.09.2004
486	2302	4665-A	Ihsan ul Haq	12.07.1965	01.09.2004
487	1699	Record	Hussan Baros	21.05.1958	01.09.2004
488	2805	Record	Ali Shah	02.04.1960	01.09.2004
489	2807	Record	Fayaz Ahmad	01.05.1966	01.09.2004

**ATTESTED**



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Annexure-D

گجرات جہاں ڈائریکٹریٹ: E & S Edu: صورتیہ دستاویز

عنوان: اپیل برائے حق دی SS اسٹیٹ ٹیچائی

آداب تعلیمات:-

گزارش ہے کہ بندہ بحیثیت SS (1998-1-15) سے  
 خدمات سرانجام دیتا آ رہا ہے بندہ کا SS سٹیٹ ٹیچائی لسٹ میں 1879  
 نمبر ہے۔ حالیہ فکلمہ ماسٹرس لسٹ میں سٹیٹ ٹیچائی نمبر 2255 سے 2405  
 بحیثیت SS اسٹاٹس ترقی دے دی گئی ہے۔ جو کہ بر لحاظ سے بندہ  
 کے ساتھ زیادتی ہے۔ جبکہ مزید گزار کی کئی نظر انداز کی گئی ہے۔

کہتا اگر انتخاب  
 لواحد ضمانت پرگی

21-03-2016 - 21

فخر الابرار SST  
 GHS  
 صلح نامہ

تول: مہتمم  
 ① سیکرٹری ایجوکیشن KPK  
 ② وزیر تعلیم KPK

No 105 Date 21.03.2016  
 Application in original is forwarded to DEO (M) Shangla for  
 info please

PRINCIPAL,  
 Govt. High School,  
 Shangla, Distt. Shangla

ATTESTED





(12)

Annexure - (E)

**OFFICE OF THE DISTRICT EDUCATION OFFICER (M)  
DISTRICT SHANGLA**

CONTACT NO. (0996) 850639, 851108 - FAX # 851108

NO 2117 /SST/DEO (M); SH:

Dated: 22/3/2016

To,

The Director,  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar.

Subject: - Appeal.  
Memo:-

Enclosed, please find herewith an appeal submitted by Mr. Fakhul Abrar SST(G) GHS-Gharai Kandow District Shangla is submitted for further necessary action, please.

  
DISTRICT EDUCATION OFFICER (M)  
SHANGLA

Endst: NO                       
Copy forwarded to the Principal GHS- Gharai Kandow District Shangla.

  
DISTRICT EDUCATION OFFICER  
SHANGLA.

PAKHR-UL-ABRAR

contact # 0308 2726703

**ATTESTED**







(13)

Annexure-F

GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Dated Peshawar the 11-05-2017

**NOTIFICATION**

**No.SO(PE)/2-6/DPCMeeting/SST-SS (10/01/17):** On the recommendations of the Departmental Promotion Committee, the Competent Authority is pleased to promote the following Nineteen (19) Male SSTs (BS-16) to the post of Subject Specialist (BS-17) on regular basis with immediate effect:-

S#	Sent #	Name & Present School Address	Proposed Station	Remarks
1	550	Mr. Muhammad Saeed Khan MA Edu., GHS No.1 Abbottabad	SS (Urdu) BS-17 GHSS Khanispur Aytbia, Abbottabad	Against the vacant post
2	615	Mr. Abdul Zahir Shah BA Bed, GHSS Mama Khel Banochi, Bannu	SS (Islamiyat) BS-17 GHSS Al-Hamid Wali Noor, Bannu	Against the vacant post
3	626	Mr. Abdul Karim SET MA B.Ed, GHSS Batkhela, Malakand	SS (Urdu) BS-17 GHSS Ziam Dara, Dir Lower	Against the vacant post
4	777	Mr. Wali ur Rehman SET BA Bed, GHS Julagram, Malakand	SS (Pak Study) BS-17 GHSS Khanpur, Dir Lower	Against the vacant post
5	844	Mr. Jehan Daraz Khan SET MA B.Ed, GHS No.1 Bannu City	SS (H/Civics) BS-17 GHSS Shakardarra, Kohat	Against the vacant post
6	1113	Mr. Noor ul Bashar MA B.Ed, GHS Prang Ghar, Mohmand Agency	Services placed at the disposal of ACS FATA	
7	1148	Mr. Bakhtiar Khan SET MA B.Ed, GHS Zaryab Colony, Peshawar	SS (Urdu) BS-17 GHSS Shergao, Charsadda	Against the vacant post
8	1757	Murad Ali Shah MA M.Ed, GHS Civil Quarter, Peshawar.	SS (Pak Study) BS-17 GHSS Zahir Abad, Peshawar	Against the vacant post
9	1833	Mr. Fakhru Abrar MA B.Ed SET, GHS Garhi Khandan Puran, Shangla	SS (Islamiyat) BS-17 GHSS Sandoi, Shangla	Against the vacant post
10	2141	Mr. Ahmad Hussain SET, GHS Mandran Saidan, D.I.Khan	SS (H/Civics) BS-17 GHSS Chowdwan, D.I.Khan	Against the vacant post
11	2547	Mr. Fazli Hakeem SET MA Med, GHSS Bam Pokha, Buner	SS (H/Civics) BS-17 GHSS Bam Pokha, Buner	Against the vacant post
12	2676	Mr. Sardar Muhammad SST, GCMHS Sadda Lower, Kurram Agency	Services placed at the disposal of ACS FATA	
13	2722	Mr. M. Ismail SET MA B.Ed, GHSS Barawal Bandi, Dir Upper	SS (Biology) BS-17 GHSS Gandigara, Dir Upper	Against the vacant post
14	2806	Mr. Noor Rehman. GHS Kotkai, SWA	Services placed at the disposal of ACS FATA	
15	2887	Mr. Abdul Qadeer SET, GHS Gora Bazgran, Abbottabad	SS (English) BS-17 GHSS Ziarat Masoom, Abbottabad	Against the vacant post
16	2910	Mr. S. Shah Saood, GHS No.1 Abbottabad	SS (Pak Study) BS-17 GHSS Nagri Bala,, Abbottabad	Against the vacant post
17	3200	Mr. Muhammad Farooq Khan, GHSS Nadar Badin Khel, FR Bannu	SS (Pak Study) BS-17 GHSS Shahbaz Azmat Khel, Bannu	Against the vacant post
18	3477	Mr. Fazal Khaliq SET MA M.Ed, GHS Aman Kot, Swat	SS (Pak Study) BS-17 GHSS Kabal, Swat	Against the vacant post

**ATTESTED**

14

19	4226	Mr. Muhammad Ilyas SET MA M.Ed, GHS Oghi, Mansehra	SS (H/Civics) BS-17 GHSS Karrori, Mansehra	Against the vacant post
----	------	---	---	----------------------------

2. On their promotion, the Subject Specialist concerned will be on probation for a period of one year in terms of Section 6(2) of NWFP Civil Servant Act, 1973 read with Rule 15(1) of the NWFP Civil Servant (Appointment, Promotion & Transfer) Rules, 1989.

3. No. TA/DA allowed.

SECRETARY

Endst. No. & date as above.

Copy to:

1. The Additional Chief Secretary (FATA), FATA Secretariat Warsak Road Peshawar.
2. The Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department.
3. The Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department.
4. The Accountant General Khyber Pakhtunkhwa, Peshawar.
5. PSO to Chief Secretary to Govt. of Khyber Pakhtunkhwa.
6. The Director (E&SE) Khyber Pakhtunkhwa Peshawar.
7. The Director Education FATA, Warsak Road, Peshawar.
8. The Director Curriculum & Teachers Education, Abbottabad.
9. The Director ESRU, Khyber Pakhtunkhwa.
10. The Deputy Director (EMIS), E&SE Department, with the request to upload the notification of E&SE Department website ([www.kpese.gov.pk](http://www.kpese.gov.pk)).
11. The District Education Officers, Elementary & Secondary Education concerned.
12. The District Accounts Officers concerned.
13. PS to Secretary E&SE Department.
14. Subject Specialist concerned.
15. Office File.



(NAIK MUHAMMAD)  
SECTION OFFICER (PRIMARY)

ATTESTED

To,

(15)

The Secretary E&S Education KPK.

Annexure - (9)

Through Proper channel

Subject: Application for Seniority and other benefits

Sir,

Respectfully I beg to say that my promotion was due on 17-03-2016 as SS (Isl) although I had fulfilled all the requirements in time but I was differed and promoted on 10-05-2017.

All the necessary proofs are hereby attached.

Kindly allow me Seniority and other benefits from 17-03-2016.

Forwarded in original  
to the DEO (M) Shangla  
for onward submission to the  
concerned quarters.

Yours obediently,  
FAKHR UL ABRAR  
SS (isl) GHSS  
SANDOVI, PURAN  
SHANGLA

*Muhammad Akbar*

Principal  
Govt Higher Secondary school  
Sandovi Puran Distt: Shangla

ATTESTED

*[Signature]*

16

✓ Annexure - (H)



**OFFICE OF THE DISTRICT EDUCATION OFFICER (M)**

**DISTRICT SHANGLA**

**CONTACT NO. (0996) 850639. 851108- FAX # 851108**

No. \_\_\_\_\_ /P-File/h-m/DEO (M) SH:

Date 24 /08/2017.

To,

The Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar.

Subject:

Application For Seniority And Other Benefits.

Memo;

Enclosed, please find herewith an appeal submitted by Mr. Fakhul Abrar SS (Islamayat) GHSS Sundovi District Shangla is submitted for further necessary action, please.

DISTRICT EDUCATION OFFICER (M)  
SHANGLA

Endost: No. 9827

Copy forwarded to the Principal GHSS Sundovi District Shangla.

**ATTESTED**

DISTRICT EDUCATION OFFICER (M)  
SHANGLA

  
24/8/17

**VAKALATNAMA**

In The Court of KP Service Tribunal, Peshawar.

Fakhrul Abeer.

(APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

**VERSUS**

Education Department

(RESPONDENT)  
(DEFENDANT)

I/We Fakhrul Abeer.

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. 20 / Dec /2017



**CLIENT**

  
**ACCEPTED**

**NOOR MOHAMMAD KHATTAK**

**&**

  
**MUHAMMAD MAAZ MADNI**  
**ADVOCATES**

OFFICE:

Room No.1, Upper Floor,  
Islamia Club Building, Khyber Bazar,  
Peshawar City.

Phone: 091-2211391

Mobile No.0345-9383141

**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**

Appeal No: 1423/2017

Filed by Fakhar-ul-Abrar ..... Appellants

Versus

Govt. of KPK and others ..... Respondents

**Concise statement on behalf of Respondent No. 3.**


**Respectfully Shweth.**

- Respondent No. 3 have been promoted as per rules / policy vide notification dated 17.3.2016 with immediate effect. Copy enclosed as Annex-"A".
- Appellant has impugned notification dated 11.5.2017, which does not contain name of respondent No. 3, nor respondent No. 3 has been promoted vide notification dated 11.5.2017, therefore appellant does not have any case of action, against respondent No. 3, who have been duly promoted as per rules / law.
- Notification dated 17.3.2016 have been issued by competent authority on the basis of departmental promotion committee, therefore official respondents may in better position to explain, whether the appellant is entitled for the relief claimed for or otherwise.

**Pray:**

In light of the above legal and factual position it is humbly prayed that name of the respondents No. 3 may please be excluded from the list of the respondents.

**Respondent No. 3**

  
**Fazal-ur-Rehman**  
**Subject Specialist**  
**GHSS Ibrahim Zai**  
**Hangu**

**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**

Appeal No: 1423/2017

Filed by Fakhar-ul-Abrar ..... Appellants

Versus

Govt. of KPK and others ..... Respondents

**Concise statement on behalf of Respondent No. 3.**


**Respectfully Shweth.**

- Respondent No. 3 have been promoted as per rules / policy vide notification dated 17.3.2016 with immediate effect. Copy enclosed as Annex-"A".
- Appellant has impugned notification dated 11.5.2017, which does not contain name of respondent No. 3, nor respondent No. 3 has been promoted vide notification dated 11.5.2017, therefore appellant does not have any case of action, against respondent No. 3, who have been duly promoted as per rules / law.
- Notification dated 17.3.2016 have been issued by competent authority on the basis of departmental promotion committee, therefore official respondents may in better position to explain, whether the appellant is entitled for the relief claimed for or otherwise.

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**Respondent No. 3**

  
**Fazal-ur-Rehman**  
**Subject Specialist**  
**GHSS Ibrahim Zai**  
**Hangu**

**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**

Appeal No: 1423/2017

Filed by Fakhar-ul-Abrar ..... Appellants

**Versus**

**Govt. of KPK and others ..... Respondents**

**Concise statement on behalf of Respondent No. 3.**


**Respectfully Shweth.**

- Respondent No. 3 have been promoted as per rules / policy vide notification dated 17.3.2016 with immediate effect. Copy enclosed as Annex-"A".
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**Pray:**

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**Respondent No. 3**

  
**Fazal-ur-Rehman**  
**Subject Specialist**  
**GHSS Ibrahim Zai**  
**Hangu**



**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**

**Appeal No: 1423/2017**

**Filed by Fakhar-ul-Abrar ..... Appellants**

**Versus**

**Govt. of KPK and others ..... Respondents**

**Concise statement on behalf of Respondent No. 3.**

**Respectfully Shweth.**


*Place in Hks  
26.9.2018*

- Respondent No. 3 have been promoted as per rules / policy vide notification dated 17.3.2016 with immediate effect. Copy enclosed as Annex-"A".
- Appellant has impugned notification dated 11.5.2017, which does not contain name of respondent No. 3, nor respondent No. 3' has been promoted vide notification dated 11.5.2017, therefore appellant does not have any case of action, against respondent No. 3, who have been duly promoted as per rules / law.
- Notification dated 17.3.2016 have been issued by competent authority on the basis of departmental promotion committee, therefore official respondents may in better position to explain, whether the appellant is entitled for the relief claimed for or otherwise.

**Pray:**

In light of the above legal and factual position it is humbly prayed that name of the respondents No. 3 may please be excluded from the list of the respondents.

**Respondent No. 3**

  
**Fazal-ur-Rehman  
Subject Specialist  
GHSS Ibrahim Zai  
Hangu**

**BEFORE THE HONORABLE KHYBER PAKHATUNKHWA SERVICE TRIBUNAL  
PESHAWAR.**

**Service Appeal No: 1423/2017**

**Fakhrul Abrar SS(Islamiyat) GHSS Sandal Puran District Shangla .....Appellant.**

**VERSUS**

**Secretary E&SE Department, Khyber Pakhtunkhwa & others. ....Respondents**

**JOINT PARAWISE COMMENTS FOR& ON BEHALF OF RESPONDENTS No: 1-2.**

**Respectfully Sheweth :-**

The Respondents submit as under:-

**PRELIMINARY OBJECTIONS.**

- 1 That the Appellant has got no cause of action locus/standi .
- 2 That the instant Service Appeal is badly time barred.
- 3 That the Appellant has concealed material facts from this Tribunal.
- 4 That the instant service appeal is based on mala fide intentions.
- 5 That the Appellant has not come to this Tribunal with clean hands.
- 6 That the instant Service Appeal is against the prevailing law & rules.
- 7 That the Appellant has been treated as per law, rules & policy.
- 8 That the appeal is not maintainable in its present form.
- 9 That the appeal is bad for mis-joinder & non-joinder of the necessary parties.
- 10 That the instant Service Appeal is barred by law.
- 11 That the Appellant is not competent to file the instant appeal against the respondents.
- 12 That the Notification dated 11/5/2017, is legally competent & is liable to be maintained.
- 13 That the Notification dated 11/5/2017 is in accordance with the mandatory provisions of KPK ESTA Code-2011.
- 14 That the appellant is not entitled for the grant of promotion against the Subject Specialist (Islamiyat) BPS-17 Post wef 17/3/2017.

## ON FACTS


- 1 That Para-1, needs no comments, as each & every civil servants is liable to serve his parent Department with his utmost sincerity & devotion against the post he holds.
- 2 That Para-2 is incorrect & denied on the grounds that the appellant did not bother to submit his ACRs/PERs in spite of repeated letters & correspondence as evident from letter No: 2395 dated 30/7/2017 of the District Education Officer(M) Shangla (**copy of the same is annexure-A**).
- 3 That Para-3 is correct to the extent of grant of promotion to the eligible SSTs in BPS-16 against the Subject Specialist (BPS-17) on the basis of their respective seniority cum-fitness after submission of the required ACRs/PERs complete in all respect to the Respondent No: 2 for working papers & DPC/PSB wherein, the appellant has failed to submit his ACRs/ PERs. Hence, he has been deferred for the grant of promotion against the Subject Specialist (Islamiyat) Post in BPS-17 vide the Notification dated 17/3/2017, issued by the Respondent No: 1 after observing all codal formalities.**(Copy of the Notification dated 17/3/2017 is annexed as annexure-B)**.
- 4 That Para-4 is correct to the extent of grant of promotion to the appellant vide Notification dated 17/5/2017 against the SS(Islamiyat) BPS-17 Post in view of the mandatory provision of Khyber Pakhtunkhwa ESTA Code 2011 with immediate effect as & when the appellant has submitted his ACRs/PERs to the Respondent Department. Hence, is legally competent & liable to be maintained in favour of the Respondents in the interest of justice**(Copy of the cited rulings of ESTA Code-2011 is annexed as Annexure-C)**.
- 5 That Para-5 is also incorrect & denied. The Departmental appeal of the appellant is badly time barred under the provision of law of limitation Act: 1908. Therefore, not tenable in the eyes of relevant provisions of law & deserved to be struck down in favour of the Respondents in view of the foregoing submissions in the instant reply on behalf of the Respondents.
- 6 That Para-6 is legal & this Tribunal has got no jurisdiction to entertained the instant service appeal. Hence, liable to be dismissed on the following grounds inter alia :-

## GROUNDS

- A Incorrect & not admitted. The impugned Notification dated 11/5/2017 is within legal sphere & in accordance with the above cited provisions of Khyber Pakhtunkhwa, ESTA Code 2011 as well as natural justice. Hence, liable to be maintained.
- B Incorrect & not admitted. The appellant has been treated in accordance with the relevant provisions of law & rules having no question of violation of Article-4 & 25, of the constitution of the Islamic Republic of Pakistan-1973.
- C Incorrect & not admitted. The grant of promotion is always with immediate effect under the provisions of ESTA Code-2011 read with APT rules 1989. Hence, the stand of the appellant is liable to be struck down.
- D Incorrect & not admitted. Detailed reply of this grounds has already been given in the foregoing paras of the instant reply on behalf of the Respondents. Hence, needs no further comments.

- E Incorrect & denied. The appellant is not entitled for the grant of promotion wef 17/3/2017 & has thus correctly been promoted vide the Notification dated 17/5/2017 after observing all the legal & codal formalities by the Respondent No: 1 in the instant. Hence, the plea of the appellant is or no legal force & justification.
- F Incorrect & denied. The cited Section of law is not applicable upon the case of the appellant as he has miserably failed to submit his ACRs/PERs complete in all respect well in time to the Respondent Department. Hence, he has not been promoted vide Notification dated 17/3/2017 by the Respondent No: 1.
- G Legal. However, the Respondents No: 1 & 2 further seek leave of this Tribunal to submit additional grounds, record & case law at the time of arguments in the interest of justice & equity, please.

**In view of the above made submissions, it is most humbly prayed that this Honorable Tribunal may very graciously be pleased to dismiss the instant Service Appeal with cost in favour of the Respondent Department.**

  
Secretary

E&SE Department Khyber  
Pakhtunkhwa, Peshawar  
(Respondent No:1)

  
Director

E&SE Department Khyber  
Pakhtunkhwa, Peshawar.  
(Respondent No: 2)

**AFFIDAVIT**

I, Hameedur Rehman Asstt: Director (Litigation-II) E&SE Department do hereby solemnly affirm and declare on oath that the contents of the instant Parawise Comments are true & correct to the best of my knowledge & belief.



Deponent

5

Annexure - (A) 12

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) SHANGLA  
AT ALPURAI

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

Dated 30/07/2015

(A) 1

No. 9395

MOVEMENT ORDER.

Mr. Alami Rashid Senior Clerk of this office is hereby deputed to Peshawar to submit the SST promotion to SS files of the following teachers through special messenger to the office of the director (E & SE) Shangla today on 29/07/2015, and to bring PTC training books from Wali Khan Deputy Director (P & D) Pakhtunkhwa.

- 1) Ahmad Hilal SST Science GHS Puran (Chemistry)
- 2) Fakhrul Abrar SST General GHS Gharai Kandav. 2 (Islamiat, Arabic)
- 3) Qasim Shah ADO Primary Eutyaf Circle (Islamiat)
- 4) Fahim Jan SST General GMS Bilkanai (Islamiat)
- 5) Muhammad Saeed Ullah SST General GHS Damorai. (Islamiat).

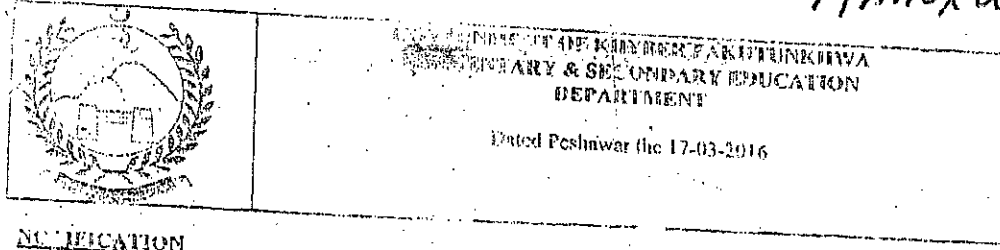
*[Signature]*  
30/7/15  
District Education Officer (M),  
Shangla

*[Signature]*

6

Annexure B

H



**NOTIFICATION**

No. SO/PE/2-6/DFC Meeting/SS/19/2016 On the recommendation of the Departmental Promotion Committee, the Competent Authority is pleased to promote the following Seven Hundred and Thirty Seven (737) Male SSTs (BS-16) to the post of Subject Specialist (BS-17) on regular basis with immediate effect:-

S#	S# In Subject	SL#	Name and Qualification	Present Station Address	Proposed Station	Remarks
1	1	746	Sikandar Khan	GHS Fatta, Ghulam Peshawar	SS B-17 (Biology) GHSS Tehkal, Dala Peshawar	Against vacant post
2	2	1370	Zeenat Ullah SET M. Ed	GHS Mirza Khatun, Peshawar	SS B-17 (Biology) GHSS Dalah, Lawafhar Karak	Against vacant post
3	3	1813	Mr Sultan Farooq, SET	GHS Sangan, Jala Mada Khel FR, Dera	Services placed at the disposal of Director Education FATA	Against vacant post
4	4	1871	Mr Akhtar Nawaz Khan MSc: M. Ed	GCHHS Zuhala Township Haripur	SS B-17 (Biology) GHSS Jami Pindi, Haripur	Against vacant post
5	5	2751	Mr. Muhammad Fayaz Shah SET	GHS Roshan, Peshawar	SS B-17 (Biology) GHSS Rastakhi, Nowshera	Against vacant post
6	6	2768	Mr. Younsf Zaman, SET	GHS Jan Khat, Dera	SS B-17 (Biology) GHSS Nari, Panooz, Karak	Against vacant post
7	7	2775	Mr. B. M. Baidar, SER	GHSS Barikot, Dera	SS B-17 (Biology) GHSS Kishawn, Swat	Against vacant post
8	8	2799	Mr. Janat Gul, SET	GHSS Khogul, Dir Lower	SS B-17 (Biology) GHSS Anbar, Dir Lower	Against vacant post
9	9	2894	Mr. Bakht Ali Shah, SET	GHSS Sani, Haripur Lokki	SS B-17 (Biology) GHSS Abdul Khat, Lokki	Against vacant post
10	10	2965	Muhammad Atafur Rehman S.T MSc Ed	GHS Ghosia, Haripur	SS B-17 (Biology) GHSS Beer, Haripur	Against vacant post
11	11	3063	Bakhar Ali Sheh S/O Zardad Khan MSc MEd Baran	GHS Tour, Baran, Khel Baran	SS B-17 (Biology) GHSS Choristi, Kohat	Against vacant post
12	12	3302	Amir Alam Khan S/O Gul Muhammad Dir, MSc, Ed	GHS Hoshia, Mardan	SS B-17 (Biology) GHSS Dir South, Mardan	Against vacant post
13	13	3858	Fazli Subhan S/O Gul Khan 145c MEd	GHS Tall Sana	SS B-17 (Biology) GHSS Tall Sana	Against vacant post
14	14	4134	Syed Asif Hussain Shah SET MA D.Ed	GHS Talwan, Mardan	SS B-17 (Biology) GHSS Dera, Mardan	Against vacant post
15	15	4554	Sajid Hussain SET B.A/B.Ed	GHS Chakarbal, Kot Mada Kohat	SS B-17 (Biology) GHSS Jandi, Pindi, Kohat	Against vacant post
16	16	4559	Mehboob Alam SET M.Sc/M.Ed	GHS Kot Roshan, Fata	SS B-17 (Biology) GHSS Roshan, Khel FATA	Against vacant post
17	1	520	Masood Ali MEd	GHS Mardan, Fata	SS B-17 (Biology) GHSS Randa, Khel Karak	Against vacant post
18	2	534	Usup Ali MSc Ed	GHS Khayran, Ghulam Mardan	SS B-17 (Chemistry) GHSS Malshan, Atak, Mardan	Against vacant post
19	3	564	Hussain Haq MSc Ed	GHS Shergara, Mardan	SS B-17 (Chemistry) GHSS Shergara, Mardan	Against vacant post
20	4	569	Muhammad Iqbal SET MSc M.Ed	GHS Ouch, Dir Lower	SS B-17 (Chemistry) GHSS Boldera, Dir Lower	Against vacant post
21	5	579	Zamullah MSc Ed	GHS Sana, Kohat, Fata	SS B-17 (Chemistry) GHSS Shah, Solman Kohat	Against vacant post

(7)

11

G

709	75	1681	Ahmad Muzar SET MA B Ed	GHS Khan - Dera - Dir Upper	SS B-17 (Islamiyat) GHSS Gannajar, Dir Upper(Rtd:13 to 16)	Against vacant post
710	76	1688	Satibul Haq SET	GHSS Labour Colony Mardan	SS B-17 (Islamiyat) GHSS Ghannatabi, Swat	Against vacant post
711	77	1692	Shamimullah SET	GHS No.3 Kotla	SS B-17 (Islamiyat) GHSS Mustun Abad Kohat	Against vacant post
712	78	1707	Karim Nawaz SET	GHSS Gul Imam Tank	SS B-17 (Islamiyat) GHSS - Gumbaz - Bazar, Tank	Against vacant post
713	79	1714	Hameedullah SET	GHS No 1 Nowshera Camp	SS B-17 (Islamiyat) GHSS Nisatin, Charsadda	Against vacant post
714	80	1715	Abdur Razzaq SET	GHSS Battagram	SS B-17 (Islamiyat) GHSS Mera Nada Khet, Torghar	Against vacant post. His date of birth is 01.03.1956 and he has retired on superannuation basis on 05.03.2016, while the DPC was held on 20.10.2015 thus he is promoted w.e.f. date of DPC, in light of Establishment Department Instructions SC(H- VI)E&AD-16/2005 dated 22.03.2006
715	81	1720	Muhammad Zafiqar SET	GHS No.2 Kotla	SS B-17 (Islamiyat) GHSS Al-Haamud Zan, Kohat	Against vacant post
716	82	1721	Raza Khan SET	GHS Shewa Swabi	SS B-17 (Islamiyat) GHSS Jangra Buner	Against vacant post
717	83	1724	Muhammad SET	GHS Kaudal Peshawar	SS B-17 (Islamiyat) GHSS Umarzal, Charsadda	Against vacant post
718	84	1728	Ayub Khan SET MA MEd	GHSS Peshawar Chankani	SS B-17 (Islamiyat) GHSS Jabbi Nowshera	Against vacant post
719	85	1735	Ghulam Rasool	GHS No. 1 Baka Gong Mardan	SS B-17 (Islamiyat) GHSS No.1 Baka Gong Mardan	Against vacant post
720	86	1736	Muhammad Lalai, BA, Bed	GHSS No 1 Mardan	SS B-17 (Islamiyat) GHSS Maoga, Mardan	Against vacant post
721	87	1745	Shamsun Nisar	GHS Labour Colony Mardan	SS B-17 (Islamiyat) GHSS Boobal, Charsadda	Against vacant post
722	88	1753	Akmalzeb	GHS Chahiga Swat	SS B-17 (Islamiyat) GHSS Balogram, Swat	Against vacant post
723	89	1858	Mr. Fazal Malik, BSC B Ed SET	GHSS Baghicha Dheri Medan	SS B-17 (Islamiyat) GHSS Nugram, Buner	Against vacant post
724	90	1862	Mr. Kinn Badshah BSc MEd SET	GHSS Bhalozan Mardan	SS B-17 (Islamiyat) GHSS Dokada Buner	Against vacant post
725	91	1914	Mr. Fazal Behman MA MEd SET	GHS No. 2 Hangu	SS B-17 (Islamiyat) GHSS Ibrahimzal, Hangu	Against vacant post
726	92	1983	Mr. Khurshid Iqbal BA BEd SET	GHS Landi Arlab Peshawar	SS B-17 (Islamiyat) GHSS Sheikhhan, Peshawar	Against vacant post
727	93	2019	Mr. Muhammad Rifan MA BEd SET	GHS No 1 Kotla	SS B-17 (Islamiyat) GHSS Landi Kacha, Kohat	Against vacant post
728	94	2039	Mr. Hameedullah BSC B Ed SET	GHSS Dohra Swabi	SS B-17 (Islamiyat) GHSS Dohra Swabi	Against vacant post
729	95	2050	Mr. Azhar Behman s/o Karim Bushali MA MEd SET	GHS No. 2 Tank	SS B-17 (Islamiyat) GHSS Gul Imam, Tank	Against vacant post
730	96	2073	Mr. Tariq Mahmood BSC B Ed SET	GHS No.1 Peshawar Coy	SS B-17 (Islamiyat) GHSS Adezal Peshawar	Against vacant post
731	97	2090	Mr. Jamshed Kinn MA BEd SET	GHS Subhan Khwar, Mehmand Agency	Services placed at the disposal of Director Education FATA	Against vacant post
732	98	2137	Mr. Raza Khan SET	GHS Hugal Noochaz Dheri	SS B-17 (Islamiyat) GHSS Muzhal, Tank	Against vacant post

Rasool

[Handwritten signature]

10  
P

188	1627	1707	Karim Nawaz	16.04.1971	28.03.1996
189	2326	1710	Attaullah	10.04.1967	28.03.1996
190	1069	1712	Muhammad Hammad	20.04.1965	28.03.1996
191	1846	1714	Hamid Ullah	17.09.1967	28.03.1996
192	1722	1720	Muhammad Zulfiqar	11.04.1967	28.03.1996
193	763	1728	Ayub Khan	15.01.1965	28.03.1996
194	443	1735	Ghulam Rabbani	15.01.1965	28.03.1996
195	444	1736	Muhammad Tufail	11.09.1967	28.03.1996
196	445	1737	Siraj ul Islam	01.04.1965	28.03.1996
197	1073	1739	Muhammad Sulaiman	13.09.1966	28.03.1996
198	446	1745	Shams un Nisar	15.05.1966	28.03.1996
199	761	1757	Murad Ali Shah	04.05.1966	28.03.1996
200	2800	1763	Alamzeb	01.05.1967	28.03.1996
201	447	1765	Ghulam Nabi	08.03.1966	28.03.1996
202	420	1784	Noor ul Hadi	13.01.1961	28.03.1996
203	1059	1785	Muhammad Arif	15.04.1971	28.03.1996
204	1484	Record	Burhan ud Din	28.02.1957	28.03.1996
205	1847	Record	Mazhar Hayat	26.03.1970	01.09.1997
206	2208	1832	Qudrat Shah	24.04.1956	15.01.1998
207	1694	1833	Fakhrul Ibrar	18.05.1965	15.01.1998
208	448	1858	Fazle Malik	10.04.1968	15.01.1998
209	449	1862	Khan Badshah	10.12.1969	15.01.1998
210	450	1866	Faiz ul Qadoos	04.04.1964	15.01.1998
211	235	1877	Muhammad Juma Khan	15.12.1966	15.01.1998
212	2213	1891	Siraj ud Din	01.10.1968	15.01.1998
213	764	1900	Aziz ur Rehman	03.06.1969	15.01.1998
214	1667	Record	Fazal Rehman	09.05.1962	15.01.1998
215	1848	Record	Zai Ahmad	05.11.1967	15.01.1998
216	1849	Record	Ishfaq Ali	25.05.1977	05.04.1999
217	1850	Record	Fazle Wahid	02.01.1970	07.04.1999
218	451	1967	Muhammad Ali	11.08.1967	26.05.1999
219	871	1973	Muhammad Arif	05.02.1968	26.05.1999
220	1342	2003	Habib Ullah Dotani	07.08.1972	26.05.1999
221	765	2018	Muhammad Faheem	15.02.1968	26.05.1999
222	2477	2028	Akhtar Munir	21.08.1972	26.05.1999
223	2908	2041	Biradar Khan	03.01.1970	26.05.1999
224	1628	2056	Aziz ur Rehman	0.10.1971	26.05.1999
225	1155	2075	Sabir Ahmad Khan	12.03.1974	26.05.1999



226	2808	2076	Salah ud Din	12.02.1964	26.05.1999
227	2334	2090	Jamsheed Khan	25.04.1970	26.05.1999
228	2214	Record	Fazal Wahab	01.01.1968	26.05.1999
229	2594	Record	Uzair, Ullah	19.04.1972	04.06.1999
230	1156	2137	Riaz Khan	15.10.1958	12.07.1999
231	2476	2141	Ahmad Hussain	14.04.1957	12.07.1999
232	2475	2145	Hameed Ullah Jan	11.06.1961	12.07.1999
233	606	2148	Fakhrul Hassan	06.03.1963	12.07.1999
234	599	2150	Amir Badshah	15.12.1956	12.07.1999
235	1162	2157	Muhammad Ayaz Khan	02.06.1961	12.07.1999
236	1160	2164	Asmat Ullah Shah	15.05.1965	12.07.1999
237	1852	2184	Muhammad Shahid	06.04.1956	12.07.1999
238	1158	2186	Ghulam Nazir Khan	10.11.1962	12.07.1999
239	1727	2194	Muhammad Zubair	14.02.1957	12.07.1999
240	2187	2201	Noor Zaman	01.05.1963	12.07.1999
241	1159	2203	Usman Ali Khan	04.07.1963	12.07.1999
242	1161	2205	Hafeez Khan	03.12.1966	12.07.1999
243	2185	2206	Muhammad Rasool	07.01.1957	12.07.1999
244	1157	2210	Rashid ur Rehman	21.01.1962	12.07.1999
245	2296	2213	Muhammad Wali Ullah	06.12.1964	12.07.1999
246	2907	2221	Ali Rehman	20.04.1957	12.07.1999
247	1021	2230	Hayan Ullah	15.04.1955	12.07.1999
248	452	2235	Abdul Malik	07.05.1956	12.07.1999
249	453	2238	Shah Pasand Khan	04.09.1956	12.07.1999
250	910	2247	Muhammad Sawez	01.12.1959	12.07.1999
251	2909	2259	Saeed Ullah Jan	07.09.1963	12.07.1999
252	1853	2262	Farooq Shah	11.03.1960	12.07.1999
253	1063	2274	Fazle Manan	01.09.1960	12.07.1999
254	250	2277	Waqar Ahmad	11.11.1961	12.07.1999
255	2780	2280	Umar Haleem	02.04.1959	12.07.1999
256	1020	2290	Sher Wali Khan	16.02.1963	12.07.1999
257	454	2298	Muhammad Zahid	04.12.1965	12.07.1999
258	2871	2303	Rab Nawaz Khan	01.12.1958	12.07.1999
259	1163	2335	Muhammad Ali Khan	04.02.1968	12.07.1999
260	2940	2340	Nazar Muhammad	09.12.1955	12.07.1999
261	2868	2344	Amir Rehman	02.02.1955	12.07.1999
262	1854	2351	Anwar ul Haq	03.05.1956	12.07.1999
263	2867	2371	Farid Khan	13.06.1985	12.07.1999

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	2808	2076	Salah ud Din	12.02.1964	26.05.1999
	2334	2090	Jarnshed Khan	25.04.1970	26.05.1999
	2214	Record	Fazal Wahab	01.01.1968	26.05.1999
	2594	Record	Uzair Ullah	19.04.1972	04.06.1999
0	1156	2137	Riaz Khan	15.10.1958	12.07.1999
31	2476	2141	Ahmad Hussain	14.04.1957	12.07.1999
232	2475	2145	Hameed Ullah Jan	11.06.1961	12.07.1999
233	606	2148	Fakhrul Hassan	06.03.1963	12.07.1999
234	599	2150	Amir Badshah	15.12.1956	12.07.1999
235	1162	2157	Muhammad Ayaz Khan	02.06.1961	12.07.1999
236	1160	2164	Asmat Ullah Shah	15.05.1965	12.07.1999
237	1852	2184	Muhammac Shahid	06.04.1956	12.07.1999
238	1158	2186	Ghulam Nazir Khan	10.11.1962	12.07.1999
239	1727	2194	Muhammad Zubair	14.02.1957	12.07.1999
240	2187	2201	Noor Zaman	01.05.1963	12.07.1999
241	1159	2203	Usman Ali Khan	04.07.1963	12.07.1999
242	1161	2205	Hafeez Khan	03.12.1966	12.07.1999
243	2185	2206	Muhammad Rasool	07.01.1957	12.07.1999
244	1157	2210	Rashid ur Rehman	21.01.1962	12.07.1999
245	2296	2213	Muhammad Wali Ullah	06.12.1964	12.07.1999
246	2907	2221	Ali Rehman	20.04.1957	12.07.1999
247	1021	2230	Hayan Ullah	15.04.1955	12.07.1999
248	452	2235	Abdul Malik	07.05.1956	12.07.1999
249	453	2238	Shah Pasand Khan	04.09.1956	12.07.1999
250	910	2247	Muhammad Sawez	01.12.1959	12.07.1999
251	2909	2259	Saeed Ullah Jan	07.09.1963	12.07.1999
252	1853	2262	Farooq Shah	11.03.1960	12.07.1999
253	1063	2274	Fazle Manan	01.09.1960	12.07.1999
254	250	2277	Waqar Ahmad	11.11.1961	12.07.1999
255	2780	2280	Umar Haleem	02.04.1959	12.07.1999
256	1020	2290	Sher Wali Khan	16.02.1963	12.07.1999
257	454	2298	Muhammad Zahid	04.12.1965	12.07.1999
258	2871	2303	Rab Navaz Khan	01.12.1958	12.07.1999
259	1163	2335	Muhammad Ali Khan	04.02.1958	12.07.1999
260	2940	2340	Nazar Muhammad	09.12.1955	12.07.1999
261	2868	2344	Amir Rehman	02.02.1955	12.07.1999
262	1854	2351	Anwar ul Haq	03.05.1956	12.07.1999
263	2867	2371	Farid Khan	15.06.1985	12.07.1999

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	598	4329	Sher Zaman	15.11.1966	01.09.2004
	1170	4331	Muhammad Hayat Khan	01.01.1965	01.09.2004
	602	4332	Gul Bayan	30.01.1963	01.09.2004
7	2192	4339	Pir Dil Khan	20.04.1957	01.09.2004
58	2483	4343	Muhammad Bilal	06.05.1967	01.09.2004
459	1495	4347	Ghulam Hussain	05.01.1965	01.09.2004
460	2810	4372	Fazal Rehman	20.08.1960	01.09.2004
461	2913	4375	Jehanzeb	01.01.1963	01.09.2004
462	1295	4387	Attiq Ullah	30.08.1962	01.09.2004
463	163	4395	Muhammad Rahim	17.02.1963	01.09.2004
464	2874	4404	Abdul Waheed	01.01.1957	01.09.2004
465	2820	4405	Ibrahim Shah	03.02.1957	01.09.2004
466	487	4412	Taj Muhammad	15.02.1957	01.09.2004
467	2804	4415	Bakht Muhammad Khan	03.05.1957	01.09.2004
468	1864	4440	Iftikhar Zaman	10.05.1966	01.09.2004
469	769	4445	Shah Nawaz Khari	15.12.1966	01.09.2004
470	2952	4452	Mushtaq Ahmad	25.02.1964	01.09.2004
471	488	4455	Anwar Ali Shah	20.03.1966	01.09.2004
472	1860	4464	Javed Khan	10.10.1956	01.09.2004
473	489	4467	Esar Ali	08.04.1968	01.09.2004
474	490	4472	Jamshed Khan	15.03.1966	01.09.2004
475	491	4480	Abdul Wakeel	15.09.1955	01.09.2004
476	2399	4510	Malik Mushtaq Ahmad	24.04.1968	01.09.2004
477	2400	4527	Faiz Rasan	06.04.1969	01.09.2004
478	2219	4566	Dilaram Khan	01.01.1967	01.09.2004
479	2220	4574	Gulajan	01.04.1965	01.09.2004
480	492	4587	Khan Bali Shah	01.01.1971	01.09.2004
481	1496	4611	Khaista Muhammad	26.01.1967	01.09.2004
482	162	Record	Bakht Zada	07.05.1962	01.09.2004
483	485	Record	Syed Qayam ud Din	12.12.1957	01.09.2004
484	486	Record	Muhammad Israil	03.05.1955	01.09.2004
485	1494	Record	Muhammad Naeem	14.09.1951	01.09.2004
486	2302	4665-A	Ihsan ul Haq	12.07.1955	01.09.2004
487	1699	Record	Hussan Baros	21.05.1958	01.09.2004
488	2805	Record	Ali Shah	02.04.1960	01.09.2004
489	2807	Record	Fayaz Ahmad	01.05.1966	01.09.2004

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# ESTA CODE

ESTABLISHMENT CODE KHYBER PAKHTUNKHWA  
(REVISED EDITION) 2011

A COMPENDIUM OF LAWS, RULES AND INSTRUCTIONS  
RELATING TO THE TERMS AND CONDITIONS  
OF PROVINCIAL CIVIL SERVANTS

COMPILED BY;  
(O&M) SECTION  
ESTABLISHMENT & ADMINISTRATION DEPARTMENT

within a period of six months from such recommendations, they would lapse. The case of such civil servant would require placement before the PSB/DPC afresh.

VI. Date of Promotion:

Promotion will always be notified with immediate effect.

VII. Notional Promotion:

In respect of civil servants who retire (or expire) after recommendation of their promotion by the PSB/DPC, but before its approval by the competent authority, their promotion shall be deemed to have taken effect from the date of recommendation of the PSB/DPC, as the case may be, and their pension shall be calculated as per pay which they would have received had they not retired/expired.

VIII. Promotion of Civil Servants who are awarded minor penalties.

(a) The question of promotion to BS-18 and above in case of civil servants who have been awarded minor penalties has been settled by the adoption of quantification of PERs and CEI which allows consideration of such cases for promotion subject to deduction of 5 marks for each major penalty, 3 marks for each minor penalty and 1 mark for each adverse PER from the quantified score and recommendation for promotion on attaining the relevant qualifying threshold.

(b) However, the CEI policy is not applicable to civil servants in BS-16 and below. In this case, the concerned assessing authorities will take into consideration the entire service record with weightage to be given for recent reports and any minor penalty will not be a bar to promotion of such a civil servant.

IX. Promotion in case of pending investigation by NAB:

If there are any NAB investigations being conducted against an officer, the fact of such investigations needs to be placed before the relevant promotion form which may take a considered decision on merits of the case.

2. All the existing instructions on the subject shall stand superseded to the above extent, with immediate effect.

*CEI: Comprehensive Evaluation Index*