

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR
AT CAMP COURT SWAT.

Service Appeal No. 7089/2021

Date of Institution ... 09.07.2021

Date of Decision ... 09.02.2023

SCANNED
KPST
Peshawar

Saeedullah S/O Sher Zaman Khan SPST GPS Dobandi Banda, Malakand.

... (Appellant)

VERSUS

Secretary Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
and 04 others.

... (Respondents)

MR. MUHAMMAD SHAHID ULLAH,
Advocate

--- For appellant.

MR. MUHAMMAD RIAZ KHAN PAINDAKHEL,
Assistant Advocate General

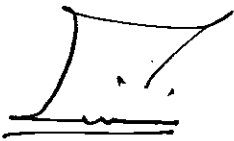
--- For respondents.

MR. KALIM ARSHAD KHAN
MR. SALAH-UD-DIN

--- CHAIRMAN
--- MEMBER (JUDICIAL)

JUDGMENT:

SALAH-UD-DIN, MEMBER:- Precise facts as alleged by
the appellant in his appeal are that the appellant was initially
appointed as PST (BPS-7) vide order dated 16.07.2011 and was
then promoted to the post of SPST; that vide impugned order
dated 19.02.2021, private respondent No.5 namely Suleman being
junior to the appellant was promoted to the post of SST, while the



appellant was deferred. The appellant filed departmental appeal on 12.03.2021, which was not responded, hence the appellant filed the instant service appeal for redressal of his grievance.

2. Notices were issued to the respondents for submission of reply/comments but they have failed to submit the same, therefore, their right for submissions of reply/comments was strucked of vide order dated 04.04.2022.

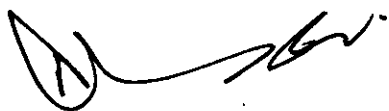
3. We have heard the arguments of learned counsel for the parties and have perused the record with their valuable assistance.

4. A perusal of the record would show that the appellant was appointed as Primary School Teacher (BPS-7) vide order dated 16.07.2011 and during the course of his service, he was later on promoted to the post of Senior Primary School Teacher. The appellant alongwith his appeal has annexed copy of seniority list of SPSTs according to which his name is placed at serial No. 660 while the name of private respondent No. 5 is placed at serial No. 686, which shows that the appellant was senior to private respondent No. 5. The appellant was, however deferred, while private respondent No. 5 was promoted to the post of SST vide impugned order dated 19.02.2021. The appellant had agitated the matter before the appellate Authority through filing of departmental appeal, however the same was not at all responded. Keeping in view the controversy in question, we deem it

appropriate that the appellate Authority shall first decide the departmental appeal filed by the appellant.

5. Consequently, the appellate Authority is directed to decide the departmental appeal of the appellant through a speaking order in accordance with relevant law/rules within a period of 45 days of receipt of copy of this judgment. Copy of this judgment alongwith copy of departmental appeal be sent to the appellate Authority for compliance. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
09.02.2023



(KALIM ARSHAD KHAN)
CHAIRMAN
CAMP COURT SWAT



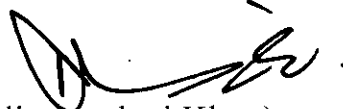
(SALAH-UD-DIN)
MEMBER (JUDICIAL)
CAMP COURT SWAT

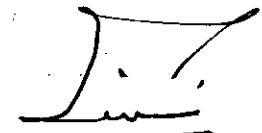
ORDER
09.02.2023

Learned counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General alongwith Mr. Muhammad Naveed, Superintendent for the respondents present. Arguments heard and record perused.

Vide our detailed judgment of today, separately placed on file, the appellate Authority is directed to decide the departmental appeal of the appellant through a speaking order in accordance with relevant law/rules within a period of 45 days of receipt of copy of this judgment. Copy of this judgment alongwith copy of departmental appeal be sent to the appellate Authority for compliance. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
09.02.2023


(Kalim Arshad Khan)
Chairman
Camp Court Swat


(Salah-Ud-Din)
Member (Judicial)
Camp Court Swat

10th Nov, 2022

Appellant in person present. Mr. Muhammad Riaz Khan Painsdakhel, Assistant Advocate General alongwith Mr. Adnan, Superintendent for the respondents present.

Appellant seeks adjournment on the ground that his counsel is busy in the august Peshawar High Court, Mingora Bench (Dar-ul-Qaza), Swat. To come up for arguments on 08.12.2022 before the D.B at Camp Court Swat.

SCANNED
KPST
Peshawar



(Salah Ud Din)
Member (Judicial)
Camp Court Swat



(Kalim Arshad Khan)
Chairman
Camp Court Swat

08.12.22

Law is hereby accepted, therefore the case is adjourned to 5-1-23 for the same.



05.01.2023

Nemo for the appellant: Mr. Muhammad Jan, District Attorney for the respondents present.

Preceding date was adjourned through Reader note, therefore, notices be issued to appellant and his learned counsel. To come up for arguments on 09.02.023 before the D.B at camp court, Swat.

SCANNED
KPST
Peshawar



(FAREEHA PAUL)
Member(E)
(Camp Court, Swat)



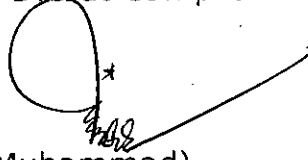
(ROZINA REHMAN)
Member (J)
(Camp Court, Swat)

صائب علی
کونسل سیں سے
طابع ہوئے

07.09.2022

Nemo for the appellant. Mr. Riaz Ahmad Paindakhel, Assistant Advocate General for official respondents No. 1 to 4 present.

Previous date was changed on the strength of Reader Note, therefore, notice for prosecution of the appeal be issued to the appellant as well as his counsel through registered post and to come up for rejoinder as well as arguments on 06.10.2022 before the D.B at Camp Court Swat.



(Mian Muhammad)
Member (Executive)
Camp Court Swat



(Salah-Ud-Din)
Member (Judicial)
Camp Court Swat

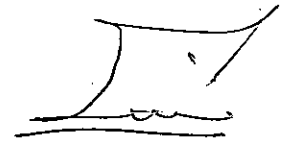
06.10.2022

Appellant alongwith his counsel Mr. Muhammad Shahid Ullah, Advocate present, who submitted fresh Wakalatnama on behalf of the appellant. Mr. Naveed, Superintendent alongwith Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for the respondents present.

Learned counsel for the appellant seeks adjournment on the ground that he has been newly engaged in the instant appeal and has not gone through the record. Adjourned. To come up for arguments on 10.11.2022 before the D.B at Camp Court Swat.



(Rozina Rehman)
Member (J)
Camp Court Swat



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

8th June, 2022

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

Counsel are on strike. To come up for arguments on
04.07.2022 before the D.B at camp court Swat.



(Mian Muhammad)
Member(E)



(Kalim Arshad Khan)
Chairman
Camp Court Swat

04.07.2022

Appellant in person present.

Noor Zaman Khattak, learned District Attorney for respondents
present.

Former made a request for adjournment on the ground that his
counsel is busy before Hon'ble Peshawar High Court, Peshawar.
Adjourned. To come up for arguments on 02.08.2022 before D.B at
Camp Court, Swat.



(Fareeha Paul)
Member (E)
Camp Court, Swat



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

2.8.22

*due to same reason the case is
adjourned to 7-9-22 for the same.*



21.12.2021

Junior to counsel for the appellant and Mr. Muhammad Adeel Butt, Addl. AG for the respondents present.

The respondents have not furnished reply/comments. Learned AAG seeks further time to contact the respondents. Let the respondents be afforded with last opportunity with the warning that in case they fail to submit the written reply/comments on or before next date, their right for reply/comments shall be deemed as struck off by virtue of this order. Case to come up for arguments on 04.04.2022 before the D.B.


Chairman

04.04.2022

Appellant present in person. Mr. Kabirullah Khattak, Addl. AG for the respondents present.

On previous date, the respondents were given last opportunity to submit written reply/comments on or before the date fixed, failing which their right for reply/comments should be deemed as struck off. The respondents failed to comply with the court order, therefore, their right to submit reply/comments has been struck off by virtue of that order. To come up for arguments on 12.05.2022 before the D.B at camp court, Swat.


(Mian Muhammad)
Member(E)


Chairman

Saeed Ullah, 7089/2021

03.09.2021

Counsel for the appellant present. Preliminary arguments heard.

Learned counsel for the appellant argued that the appellant is aggrieved of the promotion order of private respondent No.5, dated 19.10.2020 on the ground that he was junior to the appellant. His promotion case was deferred by the DPC on 19.10.2020 simply for the reason "being court case". It was further contended that instances are available that his other colleagues were promoted whose cases were also subjudged in the competent court of law but he was deprived of his due and legal rights. He preferred departmental appeal to respondent No.2 on 13.03.2021 which was not decided within the stipulated statutory period, hence, the instant service appeal before the Service Tribunal on 09.07.2021.

Points raised need consideration. The appeal is admitted to regular hearing, subject to all just and legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time or extension of time is not sought, the office shall submit the file with a report of non-compliance. File to come up for arguments on 21.12.2021 before the D.B.

Appellant Deposited
Security & Process Fee

26/10/21

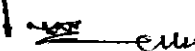


(Mian Muhammad)
Member(E)

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 7089 /2021


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	28/07/2021	<p>The appeal of Mr. Saeedullah resubmitted today by Mr. Gohar Rehman Khattak Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>03/09/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
2-		

The appeal of Mr. Saeedullah son of Sher Zaman Khan SPST GPS Dobandi Banda Malakand received today i.e. on 09.07.2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- ① Appeal has not been flagged/ marked with annexures marks.
- 2- Annexures of the appeal may be attested.
- 3- Memorandum of appeal may be got signed by the appellant.
- 4- Annexure-A of the appeal is incomplete which may be completed.
- ⑤ Copy of appeal filed by the appellant before this Tribunal as mentioned in para-4 of the memo of appeal (Annexure-C) is not attached with the appeal which may be placed on it.
- 6- Affidavit may be got attested by the Oath Commissioner.
- ⑦ Page no. 9 and 11 of the appeal are illegible which may be replaced by legible/better one.
- ⑧ Check list is not attached.
- 9- Seven more copies/sets of the appeal along with annexures i.e complete in all respect may also be submitted with the appeal.

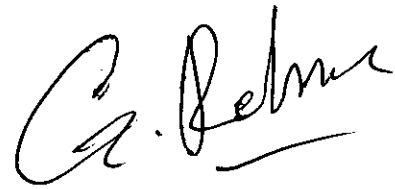
No. 1186 /S.T,

Dt. 12/07/2021


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Gohar Rehman Khattak Adv. Pesh.

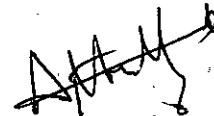
Sir, objection removed & Resubmitted



19/7/2021

Please Ten (10) days may kindly be granted for completion.

⑩ days time further extended.


19/7/2021

19/7/2021

Sir,

objection removed & Resubmitted.

G. Rahmy

0
0

objection removed & Resubmitted

G. Rahmy

objection removed & Resubmitted

G. Rahmy

objection removed & Resubmitted

10/11/2020

objection removed & Resubmitted

G. Rahmy

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR**

Appeal No _____ /2021

Saeedullah S/o Sher Zaman Khan SPST GPS Dobandi Banda, Malakand

Versus

Secretary Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar and thers

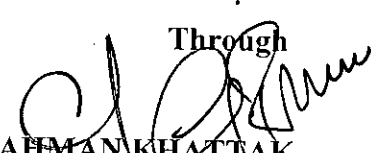
INDEX

S No	Description of Documents	Annexure	Pages
1	Grounds of Writ Petition, addresses of the parties.		1- 2
2	Affidavit		3
3	Seniority List	A	4- 5
4	DPC 19-10-2020	B	6
5	Application dated 18-12-2020	C	7- 9
6	Letter dated 20-1-2021 Letter 20-1-2021	D	10-11
7	Order dated 19-02-2021	E	12
7	Appeal	F	13
8	Wakalt Nama		

Dated:


Appellant

Through


GOHAR RAHMANKHATTAK
ADVOCATE,
HIGH COURT PESHAWAR


MUHAMMAD ARIF (FIRDOUS)
Advocate, High Court

0334-9215356

①

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR**

Appeal No 7089 /2021

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 6945

Dated 9/7/2021

Saeedullah S/o Sher Zaman Khan SPST GPS Dobandi Banda, Malakand

Versus

1. Secretary Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
2. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
3. District Education Officer (Malakand) at Batkhela
4. Sub Divisional Education Officer Dargai District Malakand
5. Suleman S/o Habib Ur Rehman Government Higher Secondary School Khar, District Malakand

**APPEAL UNDER SECTION 4 OF KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974
AGAINST ORDER DATED 19-02-2021 WHEREBY
SULAIMAN HAS BEEN PROMOTED TO THE POST OF
SST (BPS-16) JUNIOR THAN APPELLANT.**

RESPECTFULLY SHEWETH:

1. That the applicant was initially appointed PST BPS-7 vide order dated 16-07-2011 and presently posted as SPST GPS Dobandi Banda, Malakand.
2. That the applicant being most senior in the seniority list and placed on S.No.660 most senior in the relevant field for promotion to the post of SST (BPS-16 Bio Chemistry) while Sulaiman placed on S No.686 as per Seniority list. (Copy attached as annexure A)
3. That DPC held on 19-10-2020 for promotion to the post of SST but the appellant was not considered. (Copy attached as annexure B)
4. That being aggrieved from the DPC dated 19-10-2020, applicant filed an application/appeal before ~~Competent Authority~~ on 18-12-2020 but no response has been made. (Copy attached as annexure C)

Filed to-day

Registrar

9/7/2021

Re-submitted to-day
and filed.

Registrar

28/7/2021

2

5. That in this regard a letter was issued by the Deputy Director (Estab) Elementary and Secondary Education Khyber Pakhtunkhwa for announcing another meeting of DPC for 25-01-2021 with direction to decide all the cases deferred in DPC meeting held on 19-10-2020. **(Copy attached as annexure D)**
6. That the applicant being eligible for promotion to the post of SST (BPS-16) but has been ignored illegally and promoted Sulaiman (Junior from applicant) vide order dated 19-02-2021. **(Copy attached as annexure E)**
7. That being aggrieved from the order, filed departmental appeal before competent authority but so far no response has been made, hence filing this appeal before this Honorable Tribunal for redressal of grievance on the following grounds: **(Copy of application is attached as annexure F)**

GROUNDS:

- A. That the order passed by the Officials concern is illegal, unlawful and against the natural justice.
- B. That the act of the respondents are in violation of article 4,8,25,27,30, of the Constitution of Islamic republic of Pakistan 1973.
- C. That as usual, the appellant case for promotion fell prey to the red-tappism and nepotism is clearly shown from the conduct of the respondents.
- D. That the appellant was moved written request for the promotion to the next higher grade by challenging the seniority lists, but it seems that it was buried.
- E. That the appellant had not been dealt with in accordance with law, rather has been discriminated and deprived from legal right bestowed on him by the law and rules of the subject.
- F. That there is no reason for denial of the grant of promotion to the appellant to the subject post, when he fulfills all the prescribed criteria and when the post was required to be filled on promotion.

- G. That the appellant had been deprived from his legal right and was ignored with malafide intention which is illegal, unlawful, against the law and natural justice.
- H. That the appellant has the right to agitate any other additional grounds/fact at the time of arguments after the stance of the respondents with permission of this Honourable court.

It is, therefore humbly requested that on acceptance of this appeal the order dated 19-02-2021 may please be withdrawn and applicant may very graciously be promoted to the post of SST (BPS-16) Bio Chemistry with all back benefits.

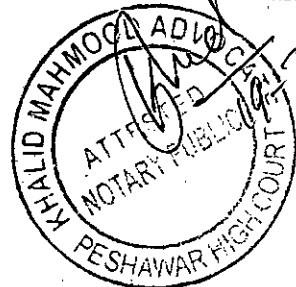
[Signature]
Appellant

[Signature] Through
GOHAR RAHMAN KHATTAK
ADVOCATE,
HIGH COURT PESHAWAR

[Signature] &
MUHAMMAD ARIF (FIRDOUS)
Advocate, High Court
0334-9215356

Office: 1.A Nasir Mansion
Shoba Bazar, Railway Road II,
Peshawar, Cantt

Contents of the appeal are true and correct to the best of my knowledge and nothing has been concealed from this Honorable Tribunal.



[Signature]
Deponent

Note:

No such like appeal has been filed earlier before this Honorable Tribunal.

(4)

"A"

Sen. No	Name	Father's Name	Present Post i.e. PSHT, SPST, PST	School	Qualification				BPS	Date of Birth	Date of 1 st Appt	Merit Position on 1 st Appt:	Date of taking over charge as PST:	Date of Passing PTC Exam	Date of promotion to the present Post	Date from other District	Date of Retirement	Mobile/ Contact No	Sub division
					Acad: Qual	division	subjects	professiona l											
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
660	Saeed Ullah	Sher Zaman Khan	SPST	GPS Dubandai Banda	MSC	1st	chem/ Biology	PTC/ B.Ed/ M.Ed	14	5-Feb-88	16-Jul-11	65	18-Jul-11	17-Sep-10	7-May-19		4-Feb-48	0314-9383631	Dargai
661	Ijaz Ahmad	Hazrat Imran	SPST	GPS Serai	M.phil Phys	1st	Bsc Maths Phys	Ptc b.ed	14	1-Feb-85	16-Jul-11	64.99	16-Jul-11	14-Mar-09	7-Jan-12		31-Jan-45	0334-9308342	Batkhehla
662	Jauhar Ali	Qasim Khan	SPST	GPS G U Khel No 1	MA	2nd	Pol.Sci, Islamic Study	CT/BED	14	13-Feb-88	16-Jul-11	64.75	18-Jul-11	14-Mar-09	7-May-19		12-Feb-48	0334-9054036	Dargai
663	Hazrat Bilal	Gul Muhammad	SPST	GPS Said Abad	M.A Islamiat	2nd	BA	PTC CT, B.ed	14	1-Apr-82	16-Jul-11	64.61	16-Jul-11	14-Mar-09	1-Jul-12		31-Mar-42	0347-9170963	Batkhehla
664	Muhammad Ishaq	Din Muhammad	SPST	GPS Khushal Gharh	MA	2nd	Pashto, Islamic Study	PTC/BED	14	15-Apr-84	16-Jul-11	64.41	18-Jul-11	20-Sep-07	7-May-19		14-Apr-44	0346-9192368	Dargai
665	Muhammad Rafiq	Faiz muhammad	SPST	GPS Hero Shah	MA	2nd	Pashto, Islamic Study	CT/Bed	14	5-Mar-85	16-Jul-11	64.36	17-Jul-11	20-Sep-07	7-May-19		4-Mar-45	0345-4612020	Dargai
666	Alamgir Khan	Niaz Muhammad	SPST	GPS Pir Mahmud Shah Banda	BSc	2nd	Maths, Phy.	CT/MED	14	25-Feb-81	16-Jul-11	64.35	18-Jul-11	17-Sep-10	7-May-19		24-Feb-41	0333-8896830	Dargai
667	Saeed Zaman	Shah Zaman	SPST	GPS Sra Shah	MA	2nd	Arts	PTC/CT/Me d	14	3-Apr-81	16-Jul-11	64.31	18-Jul-11	14-Mar-09	1-Jul-12		2-Apr-41	3459293782	Batkhehla
668	Amroz Khan	Najeeb Gul	SPST	GPS M/Amin Kaly	MA	2nd	Pashto, Islamic Study	CT/Bed/ M.Ed	14	10-Nov-77	16-Jul-11	64.13	17-Jul-11	20-Sep-07	7-May-19		9-Nov-37	0345-9287903	Dargai
669	Shakil Ahmad	Latif Khan	SPST	GPS Hero Shah	MA	2nd	Pashto, Islamic Study	PTC/BED	14	2-Mar-88	16-Jul-11	64.08	18-Jul-11	20-Sep-07	7-May-19		1-Mar-48	0344-9193890	Dargai
670	Waheed Gul	Sher Said	SPST	GPS Shah kot	MA	2nd	Pashto, Islamic Study	PTC/BED	14	8-Jan-80	16-Jul-11	64.00	18-Jul-11	14-Mar-09	8-May-19		7-Jan-40	0344-3829200	Batkhehla
671	Fazli Masood	Zafar Khan	SPST	GPS Mani serai	MA	2nd	Arts	PTC/CT/ME d	14	8-Jan-84	16-Jul-11	63.99	22-Jul-11	14-Mar-09	1-Jul-12		7-Jan-44	0344-9018578	Batkhehla
672	Fazal Subhan	Rasool Khan	SPST	GPS Shagai Amandara	MA	1st	Maths, Physics	PTC/B.ED	14	2-Feb-87	16-Jul-11	63.88	18-Jul-11	14-Mar-09	7-May-19		1-Feb-47	0344-8253817	Batkhehla
673	Shahid Rehman Mian	Aminb Gul Mian	SPST	GPS Mekhband No.1	MA	2nd	Arts	PTC/CT/Me d	14	8-Mar-86	16-Jul-11	63.84	18-Jul-11	1-Jan-07	1-Jul-12		7-Mar-46	3120916366	Batkhehla
674	Bashir Khan	Anwar Khan	SPST	GPS Katwai	MA	2nd	Arts	PTC	14	4-Feb-79	16-Jul-11	63.80	18-Jul-11	1-Jan-09	1-Jul-12		3-Feb-39	3039009887	Batkhehla

ATTENTION

5

Sen. No	Name	Father's Name	Present Post i.e. PSHT, SPST, PST	School	Qualification				BPS	Date of Birth	Date of 1 st Appt	Merit Position on 1st Appt:	Date of taking over charge as PST:	Date of Passing PTC Exam	Date of promotion to the present Post	Date from other District	Date of Retirement	Mobile/ Contact No	Sub division
					Acad: Qual	division	subjects	professiona l											
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
675	Subhan Ali Khan	Sher Amin	SPST	GPS Kachi Koper	MA	2nd	Maths, Computer.sc	PTC/BED	14	1-Apr-85	16-Jul-11	63.73	17-Jul-11	14-Mar-09	7-May-19		31-Mar-45	0346-3006432	Dargai
676	Sajid Anwar	Nemat Ullah	SPST	GPS Sharif Abad	MA	2nd	Pashto, Islamic Study	PTC/BED	14	20-Feb-85	16-Jul-11	63.63	18-Jul-11	15-Dec-07	7-May-19		19-Feb-45	0344-9132013	Dargai
677	Naushad Ali	Taj Muhammad Khan	SPST	GPS Ghound	MA	2nd	Arts	PTC/CT/M-Ed	14	20-Feb-87	16-Jul-11	63.41	18-Jul-11	14-Mar-09	1-Jul-12		19-Feb-47	3139444282	Batkhela
678	Safiullah	Mian Said	SPST	GPS No1 Kot	MA	2nd	Arts	PTC/M.Ed	14	6-Jan-83	16-Jul-11	63.35	18-Jul-11	17-Sep-10	1-Jul-12		5-Jan-43	3149799111	Batkhela
679	Bakht Jamal Khan	Shah Nazar Khan	PST	GPS Ashakai	MA	2nd	english, Islamyat	PTC/MED	12	15-Apr-87	16-Jul-11	63.22	18-Jul-11	20-Sep-07	1-Jul-12		14-Apr-47	0342-9423015	Dargai
680	Bakht Jamal Khan	Shah Nazar Khana	SPST	GPS Sher Khana	MA	2nd	english, Islamyat	PTC/MED	14	15-Apr-87	16-Jul-11	63.22	18-Jul-11	20-Sep-07	7-May-19		14-Apr-47	0342-9423015	Batkhela
681	Attaullah	Azizullah Khan	SPST	GPS Barawal	MA	1st	Arts	PTC/CT/Me d	14	3-Aug-81	16-Jul-11	63.19	18-Jul-11	14-Mar-09	1-Jul-12		2-Aug-41	3409414351	Batkhela
682	Attaur Rahman	Hassan Khan	SPST	GPS Zormandi	MA	2nd	Pashto, Islamic Study	PTC/BED	14	2-Mar-86	16-Jul-11	63.19	18-Jul-11	25-Sep-07	7-May-19		1-Mar-46		Dargai
683	Said Khan	Sabz Ali Khan	SPST	GPS Dubandai Banda	MA	3rd	pol.sce, Islamyat	CT/Bed	14	15-Feb-83	16-Jul-11	63	18-Jul-11	20-Sep-07	7-May-19		14-Feb-43	0345-9204288	Dargai
684	Imtiaz Alam	Jamroz Khan	SPST	GPS No2 Batkhela	MA	2nd	Pashto, Islamic Study	DIE/B.ed	14	14-Aug-85	16-Jul-11	62.96	18-Jul-11	20-Sep-07	5-Sep-19		13-Aug-45	0346-5644484	Batkhela
685	Muhammad Tufail	Muhammad Qasim	SPST	GPS Sind Ghara	MA	2nd	Maths, Phy	PTC/CT/BE d	14	1-Jun-78	16-Jul-11	62.91	18-Jul-11	14-Mar-09	5-Sep-19		31-May-38	3429723614	Batkhela
686	Sulman	Habibur Rehman	SPST	GPS Dara Totai	M.Sc.	1ST	BIO-CHEM	PTC/Bed/M Ed	14	8-Jan-89	16-Jul-11	62.87	20-Jul-11	14-Mar-09	5-Sep-19		7-Jan-49	3477715509	Batkhela
687	Muhammad Ayub Khan	Khan Badshah	SPST	GPS Faizghai	MA	2nd	Arts	PTC/ B.Ed	14	1-Jul-89	16-Jul-11	62.85	18-Jul-11	17-Sep-07	5-Sep-19		30-Jun-49	N/A	Batkhela
688	Amir Muhammad	Muhammad Ghani	SPST	GPS No1 Batkhela	MA	1st	isl.studies. Geograph	PTC/CTB.Ed	14	1-Apr-82	16-Jul-11	62.70	18-Jul-11	14-Mar-09	5-Sep-19		31-Mar-42	0305-8670921	Batkhela
689	M. Tahir Nadeem	Azeem Khan	SPST	GPS Gulshan Abad	B.A		Arts	PTC, CT	14	6-Jan-86	16-Jul-11	62.66	18-Jul-11	14-Mar-09	5-Sep-19		5-Jan-46	0333-9498009	Batkhela
690	Zer Akbar	Sher Afzal Khan	SPST	GPS Amandara	MA	2nd	Pashto, Islamic Study	CT/B,ED	14	11-Apr-83	16-Jul-11	62.57	18-Jul-11	20-Sep-07	5-Sep-19		10-Apr-43	0345-8860469	Batkhela

→

ATTACHED

SST DEFERRED CASES FOR PROMOTION DPC HELD ON 19.10.2020

(6) (1) B

Lower Dir SST

46	Shahid Ullah	GHS Balambat	14.08.1970	31.05.1992	BA (Al-Khair) B.Ed	Not considered for promotion to the post of SST (G) in (BPS-16), being deferred for BA form Al-Khair University. HEC-Attestation is required.
79	Ihsan Ullah	GPS Mano Dheral	10.06.1965	27.02.2013	BA, B.Ed	Not considered for promotion to the post of SST (G) in (BPS-16), being deferred for BA/B.Ed form Al-Khair University. HEC-Attestation is required.
99	Bakht Nawaz Khan	GPS Dheri Talash	01.01.1964	27.02.2013	BA, B.Ed	Not considered for promotion to the post of SST (G) in (BPS-16), being deferred for B.Ed form Al-Khair University. HEC-Attestation is required.
106	Said Bahadar Shah	GPS Bajawro	01.02.1968	27.02.2013	BA, B.Ed	Not considered for promotion to the post of SST (G) in (BPS-16), being deferred for B.Ed form Al-Khair University. HEC-Attestation is required.
120	Subhan Ullah	GPS Markhanai Maidan	01.01.1970	27.02.2013	MA, B.Ed	Not considered for promotion to the post of SST (G) in (BPS-16), being deferred for B.Ed form Al-Khair University. HEC-Attestation is required.
438	Muhammad Usman	GPS Mirgham Baia	19.01.1984	09.11.2016	B.Sc, B.Ed	Not considered for promotion to the post of SST (P/M) in (BPS-16), being deferred for B.Ed from Al-Khair University. HEC-Attestation is required.
592	Iraz Ul Haq	GPS Bagh Banda	12.09.1991	22.11.2017	B.Sc, B.Ed	Not considered for promotion to the post of SST (P/M) in (BPS-16), being deferred for non entry of B.Ed into the service book

Swabi SST

214	Shaida Muhammad Khan	GPS Bakhtiar Abad Jalbai	16.04.1972	08.12.1990	BA, PTC, B.Ed	Not considered suitable for promotion to the post of a SST (G) in (BPS-16), being deferred till the authentication of attestation of B.Ed (Al-Khair) by HEC
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Battagram SST

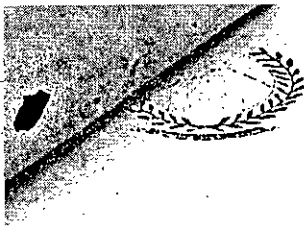
11	Ishaq Shah	GHS Biland Kot	12.03.1967	21.02.2013	BA, CT, B.Ed (Al-Khair)	Not considered suitable for promotion to the post of SST (G) in BPS-16, being deferred for B.Ed from Al-Khair University. HEC-Attestation is required
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Malakand SST

167 CT	Umar Hayat	GHS Badraga	03.01.1991	04.03.2015	B.Sc, (Z&C) Add; Sub; B.Ed	Not considered suitable for promotion to the post Of SST (B/C) in (BPS-16), deferred for being Court Case
31	Saeed Ullah	GPS Dobandai Banda	05.02.1988	18.07.2011	B.Sc, (B.C) Add; Subjects, B.Ed	Not considered suitable for promotion to the post Of SST (B/C) in (BPS-16), deferred for being Court Case

Mardan SST

12	Imtiaz Hussain	GHS Labour Colony	29.01.1987	26.11.1987	MA B.Ed	Not considered suitable for promotion to the post of SST (G) in (BPS-16), being deferred for BA from Al Khair University. HEC-Attestation is required.
100	Amjad Ali	GHS Narshak	21.02.1971	01.01.1996	MA B.Ed	Not considered suitable for promotion to the post of SST (G) in (BPS-16), being deferred till the provision of B.Com DMC with Contents for checking as whether English has been studied at Bachelor Level or not?
119	Muhammad Javed	GHS No.01 Lund Khwar	02.02.1965	25.04.1996	MA B.Ed	Not considered for promotion to the post of SST (G) in (BPS-16), being deferred for non-provision of File
110	Muhammad Hassan	GHS Sari Behlor	08.03.1967	16.04.1996	MA B.Ed	Not considered suitable for promotion to the post of ST (G) in (BPS-16), being under suspension with effect from 06.11.2019
6	Muhammad Raza Shah	GHS Jehangli Abad	02.06.1964	08.11.1986	BA, B.Ed	Not considered suitable for promotion to the post of SST (G) in (BPS-16), being deferred for BA from Al Khair University. HEC-Attestation is required. (The deferment continues since 2014 - DPC)



OFFICE OF THE DISTRICT EDUCATION
OFFICER (M) MALAKAND AT BATKHELA

Telephone No.0932-410281
Fax No.0932-410010
Email. emismalemalakand@gmail.com

7 "C"

No. 273-75 / Dated 29/12/2020.

To,

The Director, E&SE
Khyber Pakhtunekhawa, Peshawar

Subject: - APPEAL REGARDING PROMOTION TO SST (BIO, CH)

Memo: -



Enclosed please find herewith a self-explanatory appeal regarding promotion to SST (Bio,Ch) in respect of the above named teacher.

The said teacher was recommended conditionally as per photo- copy of the working paper attached.

He has passed chemistry as an additional subject from University Malakand but DMC issued provisionally in the light of PHC Darul Qaza Swat. The case may be considered accordingly please.

Encl: As above space.

Endst: No. _____ /


DISTRICT EDUCATION OFFICER
(M)MALAKAND AT BATKHELA
Dated _____ /12/ 2020. 

Copy forwarded for information and necessary action to the:-

1. SDEO (M) Batkhela.
2. Teachers Concerned.

DISTRICT EDUCATION OFFICER
(M)MALAKAND AT BATKHELA

ATTESTED


Handwritten notes at the bottom left.

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Handwritten notes at the bottom right.

8

خدمت جناب ڈائریکٹر ایلمنٹری اینڈ سیکنڈری ایجوکیشن خیبر پختونخوا، پشاور

درخواست بمراد اپرول پر نظر ثانی اور بطور SST (Bio-Chem) اپرول میں شامل

جناب عالی!

عرض کی جاتی ہے کہ سائل ضلع ملاکنڈ سے 11 ستمبر 2020 کو ڈائریکٹریٹ میں ہونے والے DPC میں SPST سے SST (Bio Chem) پر اپرول کے لئے ایک اہل امیدوار تھا۔ لیکن بد قسمتی سے اپرول میں سائل کا نام نہ تو Proposed میں اور نہ Deferred میں شامل ہے۔ اور نہ اس سلسلے میں سائل کو کوئی اطلاع دی گئی۔ لیکن سائل کو معلوم ہوا کہ سائل کا نام اس لئے شامل نہیں کیا گیا کہ سائل نے ایڈیشنل کسٹری کی ہے حالانکہ ایڈیشنل سبکدہ پاکستان بھر میں اکثر یونیورسٹیوں سے ہوتا ہے اور اس پر دوشن بھی ہوئے ہیں۔ اور اگر بات ملاکنڈ یونیورسٹی سے ایڈیشنل کرنے کی ہے۔ تو اس سے پہلے بھی اس قابل احترام ڈائریکٹریٹ نے کئی آرڈر جاری کئے ہیں جبکہ انہوں نے بھی ملاکنڈ یونیورسٹی سے ایڈیشنل کسٹری اور فزکس کیا ہے اور ان کے اور میرے DMCS ایک جیسے، مضمون ایک جیسا، ایک جیسا محکمہ، ڈائریکٹریٹ بھی وہی، ان کے آرڈر ہوئے ہیں اور میرا نہیں ہوتا؟ قابل قدر و احترام ڈائریکٹر صاحب سائل کو انصاف چاہئے۔

جنہوں نے ملاکنڈ یونیورسٹی سے ایڈیشنل کسٹری اور فزکس کیا ہے اور ڈائریکٹریٹ آف ایلمنٹری اینڈ سیکنڈری ایجوکیشن پشاور نے ان کے آرڈر بطور SST (Bio-Chem) اور SST (Maths-Physics) کی ہے ان کی تفصیل درج ذیل ہیں۔

Name	Fname	Appointed As	Station where appointed	Additional Subject In B.Sc	District	University From Which Passed Additional Subject	Order andst No. & Dated
TAHIR ALI	QASIM KHAN	SST(B/C)	GHS G.U KHEL (DISTRICT MALAKAND)	CHEMISTRY	MALAKAND	UNIVERSITY OF MALAKAND	Endst NO: 612-18/File NO.1/SST/Adhoc/Apptt./2018 Dated Peshawar the 14/09/2018.
ARZOO HAKEEM	HAKHEEM KHAN	SST(B/C)	GGHS PRANGI, SAKHAKOT (DISTRICT MALAKAND)	CHEMISTRY	MALAKAND	UNIVERSITY OF MALAKAND	Endst NO:1989-04/A-2017/CSC/2020/KP Malakand Dated Peshawar The 14/05/2020.
SHAZMA NAWAB	KHAISTA NAWAB	SST (Maths/Physics)	GGHS GARANGDARA	PHYSICS	MALAKAND	UNIVERSITY OF MALAKAND	Endst; No.5260-64/A17DSC/KP Dated Peshawar the 07/08/2020

P.T.O

ACCEPTED

یہ نو میں ذاتی طور پر جانتا ہوں اس کے علاوہ بھی ملاکنڈ کے ملاکنڈ ڈویژن کے دوسرے اضلاع میں بھی کئی ارڈرز ملاکنڈ یونیورسٹی سے ایڈیشنل کمشنر، ڈی ایچ سی، ایف ایف سی کے ذریعے جاری کیے گئے ہیں۔ اس لئے آپ صاحبان کی خدمت میں درخواست ہے کہ اس اپروئل پر نظر ثانی کر کے سائل کا بطور SST (bio-Chem) ارڈر جاری کرنے کے احکامات صادر فرمائیں۔
No: 5830 Dated 18/12/2020

العارض
محمد

SPST عبداللہ

Forwarded in original to the DEO (M)
Malakand for need action please!

GPS دو بڑی بائزہ صلح ملاکنڈ

S.No: 660

0314-9383631

Date of first Appt: 16-11-2011

as PST and 07-5-2019

as Spst.

18/12/2020
Sub Div: Edu: Office
(M) Dirgai

SDCO
18/12/2020

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) MALAKAND
WORKING PAPER FOR FOR THE PROMOTION OF
P.S.H.T./S.P.S.T TO S.S.T. Bio-Chem: (B.P.S-16)

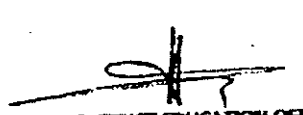
Method of recruitment		By Promotion	
Total Vacant Posts of SST (Sc: Bio-Chem:)		7	
25-% by Initial recruitment		1.750	2
75-% by Promotions		5.250	5
75 % By Promotion	40% By Promotion from S.CT/CT	2.800	3
	20% By Promotion from PSHT/SPST/PST	1.400	1
	4% By Promotion from S.AT/AT	0.280	0
	4% By Promotion from S.DM/DM	0.280	0
	4% By Promotion from S.TT/TT	0.280	0
	3% By Promotion from S.Qari/Qari	0.210	0

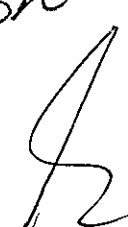
List of PSHT/SPST due for promotion to SST (BPS-16) Bio-Chem:

S. No	Sen: No.	Name of Teacher/ Design and Present school	Father's Name	Date of Birth	Date of Appc: as Regular PST	Qualification	Whether eligible for promotion?	Remarks
1	660	Sanedullah SPST GPS Dobandal Banda	Sher Zaman Khan	05-02-1988	18-07-2011	B.Sc (Bio, Zoology, Geography) & Passed Chem: as Additional Subject. M.Sc (Botany), B.Ed.	→	Took over Charge as SPST BPS-14 w.e. from 08-05-2019
2	686	Sulaiman SPST GPS Dara Total	Habib-ur-Rahman	08-01-1989	20-07-2011	B.Sc (Bio-Ch) B.Ed.		Took over Charge as SPST BPS-14 w.e. from 06-03-2019
3	703	Naimat Gul SPST GPS Muna Shah	Nisar Gul	01-01-1991	02-03-2011	B.Sc (Bio-Ch) B.Ed. (Pashto) B.Ed.		Took over Charge as SPST BPS-14 w.e. from 06-09-2019
4	714	Muhammad Afzal SPST GPS Gumbad Btk	Muhammad Akram	25-03-1980	18-07-2011	B.Sc (Bio-Ch), MA (P/Sc) B.Ed.		Took over Charge as SPST BPS-14 w.e. from 06-09-2019

1) It is certified that all the PSHT/SPST/PST (M) included in the panel for the promotion to SST.

- Hold the posts on regular basis and none of them is holding the post on adhoc/ acting charge basis.
 - Have completed required minimum length of qualifying service and qualification as required for promotion to the post of S.S.T. under the rules.
 - None of them is on deputation to any organization under the Federal/ Provincial/ Autonomous/ Semi autonomous/International organization.
 - Neither any of the disciplinary / departmental proceedings / and-corruption/ judicial inquiry is pending against them nor is any penalty is being imposed upon any one of them during the last five years.
 - No one is on long leave/ ex-Pakistan leave.
 - Their ACRs, synopsis are free from adverse remarks.
 - They are all alive and serving.
 - Their appointment orders against PST Posts are attached herewith.
 - The Seniority lists of the P.S.Ts is final, unaltered and not sub-judice.
- 2) The departmental promotion committee is requested to determine the suitability of the above PSHT/SPST/PST for promotion to SST (BPS-16) post with immediate effect.


 DISTRICT EDUCATION OFFICER,
 (MALE) MALAKAND

27/8/2020


By District Education Officer
 (M) 18-08-2020

PAGE NO.9

**OFFICE OF THE DISTRICT EDUCATION OFFICER (M) MALAKAND
WORKING PAPER FOR THE PROMOTION OF
P.S.H.T/ S.P.S.T TO S.S.T BIO-CHEM (BPS-16)**

Method of recruitment		By Promotion	
Total Vacant Posts of SST (Sc: Bio-Chem:)		7	
25% by initial recruitment		1.750	2
75% by Promotions		5.250	5
75% Promotion	40% by Promotion From S.CT /CT	2.800	3
	20% By Promotion from PSHT/ SPST/ PST	1.400	1
	4% By Promotion from S.AT/ AT	0.280	0
	4% By Promotion from S.DM/ DM	0.280	0
	4% By Promotion from S.TT/ TT	0.280	0
	3% By Promotion from S.Qari/ Qari	0.210	0

List of PSHT/ SPST due for promotion to SST (BPS-16) Bio-Chem:

S.No.	Sen; No.	Name of Teacher/ Desig; and Present School	Father's Name	Date of Birth	Date of Appt; as Regular PST	Qualification	Weather eligible for promotion?	Remarks
1.	660	Saeedullah SPST GPS Dobandai Banda	Sher Zaman Khan	05.01.1988	18.07.2011	BSc (Bio, Zoology, Geography) & passed Chem; as additional subject, MSC (Botany) B.Ed		Took over charge in SPST BPS-14 w.e.from 06.05.202019
2.	686	Sulaiman SPST GPS Dara Totai	Habib ur Rheman	08.01.1989	20.07.2011	B.sc (Bio-Ch) B.Ed		Took over charge as SPST BPS-14 w.e.from 06.09.2019
3.	703	Naimat Gul SPST GPS Muna Shah	Nisar Gul	01.01.1991	02.03.2010	BSc (Bio-Ch), MA (Pashto) B.Ed.		Took over charge as SPST BPS-14 w.e.from 06.09.2019
4.	714	Muhammad Afzal SPST GPS Gumbad Btk	Muhammad Akram	25.03.1980	18.07.2011	BSc (Bio-Ch), MA (P/SC) B.Ed		Took over charge as SPST BPS-14 w.e.from 06.09.2019

- 1) It is certified that all the PSHT/ SPST/ PST (M) included in the panel for the promotion to ST.
 - a. Hold the posts on regular basis and none of them is holding the post on adhoc/ acting charge basis.
 - b. Have completed required minimum length of qualifying service and qualification as required fro promotion to the post of SST under the rules.
 - c. None of them is on deputation to any organization under the Federal/ Provincial/ Autonomous/ Semi Autonomous/ International organization.
 - d. Neither any of the disciplinary/ anti-corruption/ judicial Inquiry is pending against them nor is any penalty is being imposed upon any one of them during the last five years.
 - e. No one is on leave/ ex-Pakistan leave.
 - f. Their ACRs, synopsis and free from adverse remarks.
 - g. They are all alive and serving
 - h. The appointment order against PST Posts are attached herewith
 - i. The Seniority list of the PSTs is (not visible) and not sub-judice.
- 2) The departmental promotion committee is requested to determine the suitability of the above PSHT/ SPST/ PST for promotion to SST (BPS-16) post with immediate effect.

Sd/-
DISTRICT EDUCATION OFFICER
(Male) Malakand

ATTESTED

Directorate of Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar
No. 2804/F.No. SST(M) deferred DPC Meeting
Dated Peshawar the 20/1 2021

10

"D"

To

The ALL District Education Officers,
(M) Khyber Pakhtunkhwa.

Subject: - MEETING OF DPC FOR CASES DEFERRED ON 19-10-2020
Memo:

I am directed to refer to the subject cited above and to state that the Competent Authority has been pleased to announce a Meeting of Department Promotion Committee on 25-01-2021 at this Directorate at 10.00 AM to decide all those cases deferred in DPC meeting held on 19-10-2020.

In this regard I am further directed to ask those District Education Officers (Male) wherein such deferred cases exists to submit Working Papers along with Senroity Lists , Original Service Books and Personal files in respect of deferred candidates only on the afore-mentioned date please.

Enclsoure: List of Deferred candidates

Deputy Director (Estab)
Elementary & Secondary Education
Khyber Pakhtunkhwa

Endst: No. _____

Copy of the above is to:-

1. Secretary Elementary and Secondary Eduaction KPK Peshawar, with the request to nominate a member for the meeting of deferred DPC.
2. PA to Director (E&SE) Local Directorate

Deputy Director (Estab)
Elementary & Secondary Education
Khyber Pakhtunkhwa

ATTESTED



OFFICE OF THE DISTRICT EDUCATION OFFICER (M) MALAKAND

(11)

F

ADJUSTMENT

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Govt of Khyber Pakhtunkhwa ESSE notification No SO(D&A)/1-18/E&SE/2012 Dated 11/07/2012 and Finance Department No SO(FR)/FO/10-22E Dated 16/07/2012 and services placed on the disposal of this office vide Director Endst No 8606-11/File No 1/Promotion SST (BPS-16) Dated the Peshawar 12/02/2021, the following PSHT/SPST/PST is hereby promoted to the post of SST (B/C) in BPS-16 (Rs-12910-1520-64510) respectively, plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Govt on the terms & conditions as given below with immediate effect.

B. SST (BIO/CHEM)

Sr	Sn #	Name of Teacher	Name of School	Date of Birth	Date of Apptt: as Regular	Qual:	School Where Adjusted	Remarks
1	656	Sulaiman	GPS Dara Total	08/01/1989	20/07/2011	BSC, (U/C), B.Ed	GHSS Khar	AVP

Terms and Conditions:

They would be on probation for a period of one year extendable for another one year.
They will be governed by such rules and regulations as may be issued from time to time by the Govt.
Their services can be terminated at any time, in case their performance is found unsatisfactory during probation period. In case of misconduct, he will be proceeded under the rules framed from time to time.
Charge report should be submitted to all concerned.
No TA/DA is allowed for joining their duty.
They will give an under taking to be recorded in their service books to the effect that if any over payment is made to him in light this order will be recovered and if he is wrongly promoted he will be reversed.
Before handing over charge their documents be verified. If he has not the relevant qualification as per rules, he may not be handed over charge of the post.

DISTRICT EDUCATION OFFICER (M)

Endst No: 529-33 Dated: 19 /02/2021

Copy of the above is forwarded for information to the:

- 1: PS to Secretary E&SED Khyber Pakhtunkhwa, Peshawar.
- 2: Director E&SE Khyber Pakhtunkhwa Peshawar with reference to Endst No 8606-11/File No 1/Promotion SST (B-16) Dated Peshawar the 12/02/2021
- 3: Deputy Commissioner District Malakand.
- 4: District Accounts Officer District Malakand.
- 5: District Monitoring Officer, EMA Malakand.
- 6: Principal/Head Masters Concerned.
- 7: Office File

ATTACHED

DEPUTY DISTRICT EDUCATION OFFICER
(M) MALAKAND

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

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Govt. of Khyber Pakhtunkhwa E&SE notification No.SO(B&A)/1-18/E&SE/Dated and Finance Department No.SO(FR)/FD/10-2020d dated 16.07.2012 and services placed on the disposal of this office vide Director Endst.No.8606-11/File No.1/Promotion SST (BPS-16) Dated the Peshawar 12.02.2021, the following PSHT/SPST/ PST is hereby promoted to the post of SST (B/C) in BPS-19 (Rs.18910-1520-64510) respectively, plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Govt. on the terms and conditions as given below with immediate effect.

B. SST (BIO-CHEM)

S.#	Sn#	Name of Teacher	Name of School	Date of Birth	Date of Apptt; Regular	Qual; as	School where Adjusted	Remarks.
1	686	Sulaiman	GPS Dara Totai	08.01.1989	20.07.2011	BSc. (B/C) B.Ed	GHSS Khar	AVP

TERMS AND CONDITIONS:

- They would be on probation for a period of one year extendable for another one year.
- They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- Their services can be terminated at any time, in case their performance is found unsatisfactory during probation period, in case of misconduct, he will be proceeded under the rules framed from time to time.
- Charge report should be submitted to all concerned.
- No TA/DA is allowed for joining their duty.
- They will give an undertaking to be recorded in their service books to the effect that if any over payment is made to him in light of this order will be recovered and if he is wrongly promoted he will be reversed.
- Before handing over charge their documents be verified, if he has not the relevant qualification as per rules, he may not be handed over charge for the post.

Sd/-
DISTRICT EDUCATION OFFICER (M)

Endts No.529-33 dated 19.02.2021

Copy of the above is forwarded for information to the:

1. PS to Secretary E&SED Khyber Pakhtunkhwa Peshawar.
2. Director E&SE Khyber Pakhtunkhwa Peshawar with reference to Endst No.8606-11/File No.1/Promotion SST (B-19) dated Peshawar the 12.02.2021.
3. Deputy Commissioner District Malakand
4. District Accounts Officer District Malakand
5. District Monitoring Officer, EMA Malakand
6. Principal/ head Masters Concerned.
7. Office File.

Sd/-
DEPUTY DISTRICT EDUCATION OFFICER
(M) MALAKAND

ATTESTED

(12)

F

**TO THE DIRECTOR ELEMENTARY AND SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR**

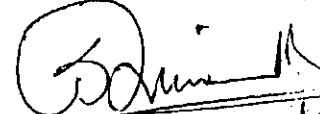
**APPEAL AGAINST ORDER DATED 19-02-2021
WHEREBY SULAIMAN HAS BEEN PROMOTED TO THE
POST OF SST (BPS-16) JUNIOR THEN APPLICANT.**

RESPECTFULLY SHEWETH:

1. That the applicant was initially appointed PST BPS-7 vide order dated 16-07-2011 and presently posted as SPST GPS Dobandi Banda, Malakand.
2. That the applicant being most senior in the seniority list and placed on S.No.660 most senior in the relevant field for promotion to the post of SST (BPS-16 Bio Chemistry) while Sulaiman placed on S No.686 as per Seniority list. (Copy attached herewith)
3. That DPC held on 19-10-2020 for promotion to the post of SST but the applicant was not considered. (Copy attached)
4. That being aggrieved from the DPC dated 19-10-2020, applicant filed an application/appeal before your worthy office on 18-12-2020 but no response has been made so far. (Copy attached)
5. That in this regard a letter was issued by the Deputy Director (Estab) Elementary and Secondary Education Khyber Pakhtunkhwa for announcing another meeting of DPC for 25-01-2021 with direction to decide all the cases deferred in DPC meeting held on 19-10-2020. (Copy attached)
6. That the applicant being eligible for promotion to the post of SST (BPS-16) has been ignored illegally and promoted Sulaiman (Junior from applicant) vide order dated 19-02-2021. (Copy attached)
7. That the order passed by the Officials concern is illegal, unlawful and against the natural justice.
8. That the applicant has the right to agitate other grounds/facts later-on.

It is, therefore humbly requested that the order dated 19-02-2021 may please be withdrawn and applicant may very graciously be promoted to the post of SST (BPS-16) Bio Chemistry.

Forwarded to SDEO (M),
Dargai for intimation please


A SDEO 12/3/2021
Asst. Supt. Divisional
So. a. Ranizat
Dargai Distt: Malakand P.T.O

12/3/2021
HEAD TEACHER
GPS Dobandi Banda
Malakand
Applicant

Saeedullah S/o Sher Zaman Khan
SPST GPS Dobandi Banda,
Malakand
Mob = 0314 - 9383631

ATTESTED

No: 5204 Dated: 16/03/2021.

Forwarded in original to the DEO (M) Malakand
for further necessary action please!

SDEO (M)
Dargai
16/3/21

Copy forwarded to;

- (1) SDEO (M) Dargai.
- (2) DEO(M) Malakand at Batkhela.
- (3) District Monitoring Officer Malakand.
- (4) Deputy Commissioner Malakand at Batkhela.
- (5) Chief Minister Khyber Pakhtunkhwa, Peshawar.
- (6) Minister for Education Khyber Pakhtunkhwa Peshawar.

قیمت
50 روپے

72632



ایڈوکیٹ: محمد عارف (ڈورس) اے ایم اے ایف ایس
بار کونسل / ایسوسی ایشن نمبر: BC-18-1133
رابطہ نمبر: 0334-9215356

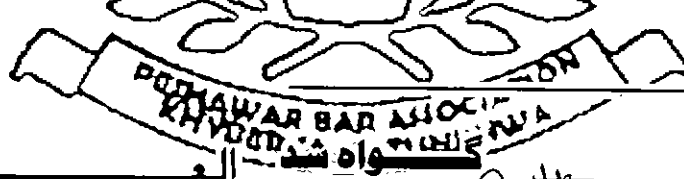
پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: سید سہیل سید صاحب

منجانب: سید / امداد	دعویٰ:
سید امداد	علت نمبر:
بنام	مورخہ:
محکمہ ٹریڈ اینڈ انڈسٹری ڈیپارٹمنٹ	جرم:
	تھانہ:

باعث تحریر آگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ
آن مقام کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز ذیل صاحب کو
راضی نامہ کرہے و تقریر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از پرہیز کی تصدیق
زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یا طرفہ یا اپیل کی برآمدگی اور منسوخی، نیز
دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے بقر کا اختیار ہوگا اور صاحب
مقرر شدہ کو وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پر داخستہ منظور و قبول ہوگا
دوران مقدمہ میں جو خرچہ ہر جانہ اتوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے
باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں لہذا وکالت نامہ لکھ دیا تاکہ سندر ہے



المقوم:

آگہ

کے لیے منظور ہے۔
نوٹ: اس وکالت نامہ کی کوئی کاپی تیار نہیں ہوگی۔

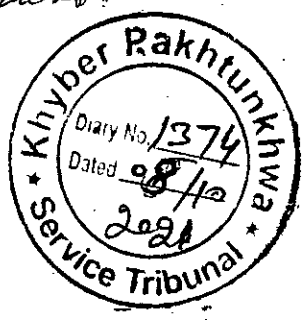
مقام: سید سہیل سید صاحب

سید امداد

15401-2825257-1
SAEED ULLAH

Before The Chairman Service Tribunal Peshawar

S B



Saeedullahi Yes Education

S.A No. 7089/2021

Put up to the worthy chairman with relevant appeal.

Application for granting time for depositing

8/10/21 Security fee.

Respectfully Shereen







That the above titled appeal is pending before this Honorable Tribunal and is fixed for ~~24-12-2021~~ 103/09/21

Allowed
12/12/2021

That the applicant wants to deposit Security fee as order by the court but due to some unavoidable circumstances the same fee was not deposited within time.

It is therefore requested that time for depositing security fee may please be granted.

Applicant
wigh
Attalul clerk

 <p>بار کونسل نمبر: BC-116-7151</p>	  <p>سرٹیکل نمبر: 94520</p> 
 <p>بار ایسوسی ایشن نمبر: 363</p>	 
<p>رابطہ نمبر: 03415257453</p>	<p>ڈسٹرکٹ بار ایسوسی ایشن سوات</p>

بعدالت جناب: جج صاحب سروس نرہ سول جڈر جسٹو خواہ سادہ کیم کے لئے موافق

<p>منجانب: عبد اللہ احمد</p>	<p>دعویٰ اور خواست:</p>
<p>عبد اللہ احمد</p>	<p>علت نمبر:</p>
<p>عبد اللہ احمد</p>	<p>مورخہ:</p>
<p>عبد اللہ احمد</p>	<p>جرم:</p>
<p>عبد اللہ احمد</p>	<p>تھانہ:</p>

بابت تحریر آگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے برائے پیروی مقدمہ

آن مقام **جل ندہ** کیلئے **محمد سید احمد اور سید مائی وردہ** اور **سید جان سید و سید**

اقرار کیا جاتا ہے، کہ صاحب موصوف کو مقدمہ کی کل کارروائی کو کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث کرنے، دعویٰ، جواب دعویٰ، اقبال دعویٰ اور درخواست برائے سرسبزی مقدمہ، منسوخی ڈگری یکطرفہ، اجراء و پیروی کرنے کا مختار ہوگا نیز دائر کرنے اپیل نگرانی، نظر ثانی و پیروی کرنے کا مختار ہوگا۔ اور مقدمہ مذکورہ کیلئے کل وقتی یا جزوی کارروائی کیلئے کسی دیگر وکیل یا مختار قانون کو اپنے ہزارہہ مال سے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی جملہ مذکورہ اختیارات حاصل ہوں گے، اور اس کا ساختہ و پرداختہ منظور قبول ہوگا، بدوران مقدمہ جو خرچہ و ہر جانہ کسی بھی سبب سے حاصل ہوگا، وہ وکیل موصوف وصول کرنے کا حقدار ہوگا، کوئی تاریخ پیشی مقام مذکورہ بالا سے باہر ہو، تو وکیل صاحب پیروی مقدمہ کرنے کے پابند نہ ہوں گے، مقدمہ کسی عدالت میں بعدم پیروی خارج ہونے یا ڈگری یکطرفہ ہونے کے صورت میں وکیل صاحب ذمہ دار نہیں ہوں گے،

لہذا کالت نامہ لکھ دیا کہ سندر ہے

کے لئے منظور ہے۔

جل ندہ

محمد سید احمد

5/10/27

عبد اللہ احمد

15401-2825257-1