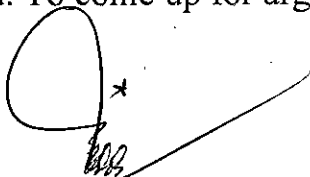


22.11.2022

Appellant in person present. Mr. Abdullah, ADEO alongwith Mr. Muhammad Jan, District Attorney for the respondents present.

Appellant requested for adjournment on the ground that his counsel is busy in the august Peshawar High Court, Peshawar. Adjourned. To come up for arguments on 10.01.2023 before the D.B.

SCANNED
KCPST
Peshawar



(Mian Muhammad)
Member (E)



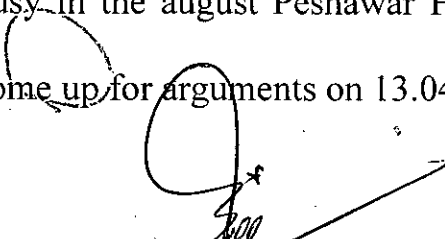
(Salah-Ud-Din)
Member (J)

10.01.2023

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

Junior of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is busy in the august Peshawar High Court, Peshawar. Adjourned. To come up for arguments on 13.04.2023 before the D.B.

SCANNED
KCPST
Peshawar



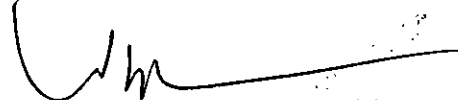
(Mian Muhammad)
Member (E)



(Salah-Ud-Din)
Member (J)

31.01.2022


Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl. AG alongwith Mr. Rafiq ADEO for respondents present and submitted reply/comments, which are placed on file and copy of the same is handed over to the learned counsel for the appellant. To come up for rejoinder if any, and arguments before the D.B on 26.05.2022.



(Atiq-Ur-Rehman Wazir)
Member (E)

26th May, 2022

Learned counsel for the appellant present. Mr. Asif Masood, DDA for respondents present.

Learned counsel for the appellant seeks time to argue the case on the next date. Last chance is given. To come up for arguments on 09.08.2022 before D.B.


(Fareeha Paul)
Member(E)


(Kalim Arshad Khan)
Chairman

9-8-2022

Due to the Public holiday the case is adjourned to 22-11-2022


Reader

M. Ijaz 4968/2021

22.09.2021

Counsel for the appellant present. Preliminary arguments heard.

Learned counsel for the appellant while addressing his arguments contended that the appellant was initially appointed as CT (BS-15) on adhoc basis vide appointment order dated 31.05.2014 whose services were regularized from the date of appointment on CT post vide notification endorsement dated 19.03.2018. The appellant, therefore, stood at serial No. 1 of the said notification. On completion of the required length of service (5 years) for promotion to the post of Senior CT (BS-16), the appellant moved a departmental appeal for promotion on 13.03.2020 which was accordingly forwarded to respondent No.3. During pendency of his departmental appeal the appellant also went in writ petition No. 1268-B/2020 dated 14.12.2020 to Peshawar High Court, Bannu Bench. The writ petition was however disposed of on 19.01.2021 with the direction to respondent No.3 "to honour and implement the directions issued by the worthy Director Elementary and Secondary Department Khyber Pakhtunkhwa, Peshawar vide letter No. 4368/F No. promotion CT to SCT Karak dated Peshawar the 12.06.2020 strictly in accordance with law". He further contended that the appellant is aggrieved of the impugned order dated 29.03.2021 when he was declared as ineligible for promotion from CT(BS-15) TO Senior CT(BS-16) whereas during pendency of his departmental appeal a notification promoting 47 CT(male) to the post of senior CT (BS-16) was issued on 28.02.2020. The date of regular appointments of the appellant, on regularization, is reckoned from 31.05.2014 i.e being his initial appointment as CT whereas those of the promoted CT is 16.05.2014 ^{who} stand junior to him. It was further contended that the appellant has been treated discriminatory and the requirements of Section-8, 9 of the Civil Servants Act, 1973 read with Rules-7 of the Khyber Pakhtunkhwa Government Servants(Appointment, Promotion and Transfer) Rules 1989 have not been fulfilled. The impugned order dated 29.03.2021 being violative of the fundamental rights of the appellant is liable to be set aside and due rights of the appellant for promotion to the post of senior CT (BS-16) be allowed from the date his erstwhile juniors were promoted.

Points raised need consideration. The appeal is provisionally admitted to regular hearing, subject to all just and legal objections including limitation. 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 31.01.2022 before the D.B.

Appellant Deposited
Security & Process Fee

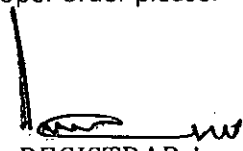
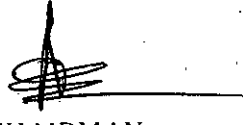

(Mian Muhammad)
Member(E)

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. - 4968 /2021

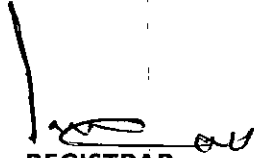
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	23/04/2021 SCANNED KPST Peshawar 27/05/21	<p>The appeal of Muhammad Ijaz Khan resubmitted today by Mr. Noor Muhammad Khattak, Advocate, may be entered in the Institution Register and put up to the Worthy Chairman 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>18/06/21</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>18.06.2021</p> <p>Counsel for the appellant present and requests for time to prepare the brief. Adjourned to 22.09.2021 for preliminary hearing before S.B.</p> <p style="text-align: right;"> Chairman</p>

The appeal of Mr. Muhammad Ijaz Khan CT, GHSS Jandari District Karak received today i.e. on 14/04/2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

Annexures-A, C and J of the appeal are illegible which may be replaced by legible/better one.

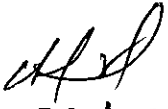
No. 717 /S.T,

Dt. 15/04 /2021


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Noor Muhammad Khattak Adv.

Note: Annex A, C, J are replaced
by better copies. Hence objection
removed and resubmitted today.


23.4.21

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

SERVICE APPEAL NO. 2968 /2021

Mr. MUHAMMAD IJAZ KHAN V/S EDUCATION DEPARTMENT

INDEX

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7	Latter dt; 12.06.2020	F	14
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Dated:12 -04-2021

APPELLANT

Through:

**NOOR MOHAMMAD KHATTAK
ADVOCATE**

FLATE NO. 04, 2ND FLOOR,
JUMA KHAN PLAZA, NEAR FATA SECRETARIAT,
SWARSAK ROAD, PESHAWAR

0345-9383141

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Appeal No. _____/2021

Mr. Muhammad Ijaz Khan, CT (BPS-15),
GHSS Jandari, District Karak.....**APPELLANT**

VERSUS

- 1- The Government Of Khyber Pakhtunkhwa, Through Secretary (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director (E&SE) education Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The District Education Officer (Male), District Karak.

.....**RESPONDENTS**

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED APPELLATE ORDER DATED 29.03.2021 WHEREBY THE APPELLANT HAS NOT BEEN CONSIDERED FOR PROMOTION TO THE POST OF SCT (BPS-16) AND THEREBY REJECTING DEPARTMENTAL APPEAL OF THE APPELLANT ON NO GOOD GROUNDS

PRAYER:

That on acceptance of this appeal the impugned appellate order dated 29.03.2021 may very kindly be set aside and the respondents may please be directed to consider the appellant for promotion to the post of SCT (BPS-16) with all back benefits including seniority. Any other remedy which this August Tribunal deems fit that may also be awarded in favor the appellant.

R/SHEWETH:

ON FACTS:

Brief facts giving rise to the present case are as under:

- 1- That appellant is initially appointed as CT (BPS-15) vide order dated 31.05.2014 on adhoc basis/contract basis in the respondents department and since appointment the appellant is performing his duty quiet efficiently and up to the entire satisfaction of his superiors. Copy of the appointment order is attached as annexure.....**A**
- 2- That Government of Khyber Pakhtunkhwa promulgated an Act the Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education Department (Appointment and Regularization of Services) Act, 2017 in light of the said Act the services of the appellant was regularized from the date of initial appointment vide notification dated 19.03.2018 and vide notification dated 16.02.2018. Copy of the notification dated 19.03.2018 & notification dated 16.02.2018 are attached as annexure.....**B & C.**
- 3- That the respondent No.3 vide notification dated 19.03.2020 held Departmental Promotion Committee wherein the colleagues of the appellant i.e AT,TT,DM,PET's (BPS-15) were given promotion to the post of SAT, STT, SDM and SPET (BPS-16) while the appellant being eligible having five years' service on

post of CT (BPS-15) was ignored deliberately and unjustifiably. Copy of the Notification dated 19.03.2020 is attached as annexure.....D.

- 4- That the appellant feeling aggrieved against impugned orders date 19.03.2020 preferred departmental to the Respondent No.2 to arrange DPC for the promotion to the Post of SCT (BPS-16) and same directed the respondent No.3 to consider the appellant in the next DPC for promotion vide dated 12.06.2020 but respondents paid no heed to it, and resultantly the appellant feeling aggrieved preferred Writ Petition No.1268-B/2020 which was accepted vide date 19.01.2021 in the terms that, "***in the light of the Submission of counsel for petitioner and no objection from Addl: AG, the instant writ petition is disposed of with direction to respondent No-3 to honor and implement the directions issued by the worthy Director Elementary and Secondary Department KP, Peshawar Vide letter No.4368/F No. Promotion CT to SCT Karak dated Peshawar the 12.06.2020 strictly in accordance with law***". Copy of the departmental appeal, letter dated 12.06.2020 and judgment are attached as annexure.....E, F, G.
- 5- That the in light of the abovementioned Judgment the respondent No.3 issued impugned appellate order dated 29.03.2021 wherein the respondents didn't consider appellant for promotion to SCT (BPS-16) neither conducted DPC for their Promotion despite appellant services was regularized from the date of his initial appointment vide notification dated 19.03.2018, while colleagues of the appellant were given promotion to higher scale leaving the appellant intentionally and without justification. Copy of the impugned appellate order dated 29.03.2021, seniority list, notifications dated 28.02.2020, and 29.02.2020 is attached as annexure.....H, I & J.
- 6- That the appellant feeling aggrieved and having no other remedy but to file this appeal on the following grounds amongst others.

ON GROUNDS:

- A- That the issuing the impugned appellate order dated 29.03.2021 and Above all, noncompliance of the direction of Honorable High Court Peshawar by the respondents is against law, fact, and norms of natural justice and material on record hence impugned appellate order dated 29.03.2021 is liable to be set aside.
- B- That the appellant has not been treated by the respondents in accordance with law and rule and on the subject noted above as such respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan, 1973.
- C- That the respondents acted in arbitrary and malafide manner by not considering the appellant for the promotion to the post of SCT (BPS-16) is against law and rules.
- D- That the respondents acted in discriminatory manner by giving promotion to colleagues of the appellant to (BPS-16) while ignoring the appellant for promotion to the post of SCT (BPS-16) deliberately, is against the norms of natural justice.
- E- That the action and inaction of the respondents by not considering the appellant for promotion to the post of SCT being eligible in all aspect and having five years' service is against the Section-8 and 9 of the Civil Servant Act, 1973 read with

Rule-7 of the (Appointment, Promotion, and Transfer) Rules, 1989, hence the impugned appellate order dated 29.03.2021 is liable to be set aside.

F- That issuance of the impugned appellate order dated 29.03.2021 by the respondent No.3 is against the spirit of Peshawar High Court Judgment vide dated 19.01.2021, hence liable to be set aside.

G- That the petitioner seeks permission to advance any other proof and grounds at the time of regular hearing.

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

APPELLANT



MUHAMMAD IJAZ KHAN

THROUGH:



NOOR MUHAMMAD KHATTAK



**AFRASIAB KHAN WAZIR
ADVOCATES**

DISTRICT EDUCATION OFFICER (MALE) KARAK

APPOINTMENT.

Consequent upon the recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the post of CT school based in BPS-15 (8500-700-29500) @ Rs.8500/-fixed plus usual allowances as admissible under the rules on adhoc basis on contract under the existing policies of provincial government, in Teaching Cadre on the terms and condition given below with effect from the date of their taking over charge.

TERMS AND CONDITION:

**DISTRICT EDUCATION OFFICER
(MALE) KARAK.**

Endst No.1724-26 apptt:CT/estb: Secy, dated karak, 03.05.2014



**DISTRICT EDUCATION OFFICER
(MALE) KARAK.**

APPOINTMENT

Consequent upon recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the post of P.T. School based in BPS-16 (Rs. 8500-900-29500) @ Rs. 8500/- fixed plus usual allowances, as admissible under the rules on ad-hoc basis on contract under the existing order of the Government in force at Karak. Cash on the terms and conditions given below with effect from the date of their taking over charge.

Sr.	Name	Register Name	Address	Name of School
1.	[Name]	[Register Name]	[Address]	[School Name]
2.	[Name]	[Register Name]	[Address]	[School Name]
3.	[Name]	[Register Name]	[Address]	[School Name]
4.	[Name]	[Register Name]	[Address]	[School Name]
5.	[Name]	[Register Name]	[Address]	[School Name]

TERMS & CONDITIONS

- Appointments are on contract basis initially for a period of one year with effect from the date of joining.
- They shall not be entitled over-charge if they over-charge before 18 months of an appointment.
- Appointment is subject to the condition that the certificate/documents must be accepted from the concerned authorities by the D.O. Karak. Any and all pending matters relating to the appointment shall stand withdrawn.
- These certificates are liable to termination on one month's notice from either side. In case of termination without notice, one-month pay/allowance shall be forfeited to the Government.
- Their pay will not be drawn until and unless their certificate/documents are verified from the Government/University.
- They should join their posts within 10 days of the issuance of their appointment. In case of failure to join the post within 10 days of the issuance of this notification, their appointment will terminate automatically and no subsequent appeal will be entertained.
- Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
- Before handing over charge he/she will sign an agreement with the department. Otherwise this order will not be valid.
- They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- Their services shall be terminated at any time, in case his performance is found unsatisfactory during his/her contract period. In case of misconduct, he/she shall be proceeded under the rules framed from time to time.
- Their appointment is made on Senior based. They will have to serve at the place of posting and their services are not transferable to any other station.
- Their pay will be released by the signature of the undersigned (D.O.) after verification of their documents. No one is allowed to release pay without verification.
- The Appointment of over Age Candidates subject to the conditions of obtaining of Age Relaxation.
- The Appointment of over Age Candidates if any is subject to the conditions of obtaining of Age Relaxation.

**DISTRICT EDUCATION OFFICER
(MALE) KARAK.**

KARAK

17/11/2023
 [Signature]
 District Education Officer, Karak

Annexure B (5)

C.T

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KARAK.

NOTIFICATION.

Under the provision of the Khyber Pakhtunkhawa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act 2018 (Khyber Pakhtunkhawa Act No.1 of 2018), In pursuance the Govt. of Khyber Pakhtunkhawa Notification No. SO (S/F)E & S ED / 3-2/2018/SITT/Contract, dated 16.2.2018, Services of the following CT appointed on adhoc basis on contract, are hereby regularized in BPS 15 on the same post in Teaching cadre on the terms and condition given below with effect from the date of their appointment on the C.T Post:

No.	Year	Name	Father Name	Domicile	Date of Birth	CNIC No	Total Marks out of 200	School where posted	Appointment order and Date
1	2014	Muhammad Ejaz Khan	Noor Janan	Karak	7.8.1989	14202-2354274-3	130.94	GHS Ghunda Shamshaki	No.1724-26 dt 3.5.2014
2	2015	Muhammad Zahoor	KHAN WALI KHAN	KARAK	01.03.1987	142038277021-3	132.15	GHS CHANDA KHURRAM	NO.916-20 DATED.14.03.2015
3	2015	Muhammad Shoaib Anwar	MUHAMMAD ANWAR	KARAK	16.06.1985	14202-7214363-1	131.44	GHS CHANDA KHURRAM	NO.916-20 DATED.14.03.2015
4	2015	Waheed Ullah	ABDUL GHANI KHAN	KARAK	13.05.1991	14203-7006352-1	120.05	GHS JATTA ISMAIL KHEL	NO.916-20 DATED.14.03.2015
5	2015	Muhammad Tayyeb	ALI JAN	KARAK	10.04.1988	14202-5130003-1	128.13	GHS TARKI KHEL	NO.916-20 DATED.14.03.2015
6	2015	Shahéén Ulláh KHAN	HAKIM RAHMAN	KARAK	03.08.1978	14202-9121204-7	127.62	GHS DARESH KHEL	NO.916-20 DATED.14.03.2015
7	2015	Muhammad Farooq	MAMREZ KHAN	KARAK	11.04.1982	14203-7865735-5	124.48	GHS SHAHIDAN CHONTRA	NO.916-20 DATED.14.03.2015
8	2015	Haroon Iqbal	SAR ANJAM KHAN	KARAK	02.06.1987	14203-2251548-1	124.25	GHS TERI	NO.916-20 DATED.14.03.2015
9	2015	Muhammad Jamil	GHULAM NABI	KARAK	03.03.1985	14202-1354339-7	123.6	GHS DABB	NO.916-20 DATED.14.03.2015
10	2015	Naqib Ullah	SHAHISTA KHAN	KARAK	05.01.1991	14202-5677158-7	123.56	GHS MAMI KHEL	NO.916-20 DATED.14.03.2015
11	2015	Kashif Adnan	IQBAL BAD SHAH	KARAK	04.05.1988	14203-1292162-9	122.65	GHS DHAND EDAL KHEL	NO.916-20 DATED.14.03.2015
12	2015	Amjad Rehman	AMAL KHAN	KARAK	12.01.1986	14203-6785468-9	122.28	GHS ESAK KHUMARI	NO.916-20 DATED.14.03.2015

108-313
B2-215

10/10/2015

6

AND CONDITIONS.

1. The regularization will not be in favour of those, who have not taken over charge Or his remained absent from duty are resign from service and also not for those who are under disciplinary proceedings.
2. Their Services shall be governed by the Khyber Pakhtunkhwa civil Servant Act 1973 ,the Khyber Pakhtunkhwa (Appointment, Deputation, Posting and transfer of teachers, Lecturers, Instructors' and Doctors)regularity Act 2011 and such rules and regulations as may be issued from time to time by the Government.
3. Their Pay shall be released subject to the verification of Academic and professional documents and testimonials from the concerned Boards/Universities by this Office.
4. Their services will considered regular and they shall be eligible for pension /deduction of GP Fund and terms of the Khyber Pakhtunkhwa Act 1973 as amended in 2013.
5. Their services is liable to termination on one month notice from either side .In case of resignation without notice, their one month pay/allowance shall be forfeited to the Government.
6. They shall possess the same Qualifications and experience required for the subject post on regular basis.
7. Their regularization shall not effect the promotion quota of the existing holders of posts in respective service cadre.
They shall rank Junior to all civil Servants belonging to the same service Or cadre, as the case may be, who are in Service on regular basis on the Govt. of the Khyber Pakhtunkhwa employees on the Elementary and Secondary Education (Appointment in regularization of Services) Act,2018 (Khyber Pakhtunkhwa Act No.1 2018) and shall also rank Junior to such other persons ,if any ,who in pursuance of the recommendations of the Khyber Pakhtunkhwa Public service commission made before the commencement of the Act ,are to be appointed to the respective Service Or cadre ,in respective of their actual Date of appointment.
8. Their Seniority shall be Determined on the basis of their continues services in cadre, Provided that if the date of continues Service in case of Two Or more as the same ,the employee elder in age shall rank Senior to the younger one .

19/03/018
 DISTRICT EDUCATION OFFICER
 (MALE) KARAK

Endst.No. 1610-17 / AE-II/CT Regularization 2018.

dated Karak the 19/3 /2018.

Copy forwarded for information and necessary action to the:-

1. PA to Director Elementary and secondary Education Khyber Pakhtunkhawa Peshawar .
2. PS to Secretary to Govt. of Khyber Pakhtoonkhawa Elementary and Secondary Education Khybere Pakhtoon Khawa Peshawar.
3. Deputy Commissioner Karak.
4. All the Principal/Head Master GHSS,GHS,GMS in-District Karak.
5. DMO Karak.
6. B & A O Local Office.
7. EMIS Section Local Office.
8. Official Concerned.

19/03/018
 DISTRICT EDUCATION OFFICER
 (MALE) KARAK.

NTED

Anxar

C^o

7

**GOVERNMENT OF KHYBER PAKHTUNKHWA ELEMENTARY & SECONDARY
EDUCATION DEPARTMENT**

Dated Peshawar the February 16th, 2018.

NOTIFICATION:

NO.SO/SF)E&SED/2-2018/SITT/CONTRACT: 1) in pursuance of Section-3 of the Khyber Pakhtunkhwa Employees of Elementary & Secondary Education Department (Appointment & Regularization of Services) Act, 2017, read with section-1 sub-section (2) of the Act ibid and Law department Government of Khyber Pakhtunkhwa Advice bearing No.ALD legis 1(A)20(201) L-9888-90 dated 20/30/2017, services of the following employees are hereby regularized with effect from the date of their initial appointment.

- 1- Teachers appointed on adhoc or contract basis by the elementary & secondary education Department in the government schools after 2013 through NTS but not including the teachers engaged on work charge basis or who are paid out of the contingencies.
- 2- Employee appointed in the following projects on contract basis in accordance with project policy.
 - A. IT/Computer Teacher in computer labs projects in Khyber pakhtunkhwa (phase-11)(110568).
 - B. Establishment of five hundreds (500) IT labs in GGHSS Khyber Pakhtunkhwa (150559).
 - C. Establishment of five Hundred (500) IT Labs in GGHSS Khyber Pakhtunkhwa (Phase-111) (160151).
- 3- Junior clerks appointed in the E&SED by government after 2013 through NTS.

TERMS AND CONDITION:

SECRETARY



GOVERNMENT OF
KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Anxure C

7

Dated Peshawar the 14th day of 16th 2018

NOTIFICATION

NO. SOIN/DE/SS/ED/3-23/18/SS/TC/Contract (1) In pursuance of Section 1 of the Elementary & Secondary Education Department (Appointments, Regularization of Services) Act, 2017, read with Section 3 Sub-section (2) of the Act and of the Department Government of Khyber Pakhtunkhwa advice bearing No. 013144 op dated 01/03/2018, D/S/S-90 dated 20/03/2017, services of the following employees are hereby regularized with effect from the date of their initial appointment:

- i. Teachers appointed on adhoc or contract basis by the Elementary & Secondary Education Department in the government schools after 2013 through NCS but not including the teachers engaged on work charge basis or who are part of contingencies.
- ii. Employees appointed in the following projects on contract basis in accordance with the project policy:
 - a. IT Computer Teacher in Computer Labs Project in Khyber Pakhtunkhwa (Phase-II) (110558)
 - b. Establishment of five hundred (500) IT Labs in GOISS Khyber Pakhtunkhwa (150559)
 - c. Establishment of five hundred (500) IT Labs in GOISS Khyber Pakhtunkhwa (Phase-III) (160151)
- iii. Junior Clerks appointed in the ESS/D by government after 2013 through NCS.

(2) TERMS & CONDITIONS:

- a. Their services shall be governed by the Khyber Pakhtunkhwa Civil Servants Act, 1973, the Khyber Pakhtunkhwa (Appointment, Deputation, Posting & Transfer of Teachers, Lecturers, Instructors & Doctors) Regulatory Act, 2011, and such rules & regulations as may be made from time to time by the government.
- b. Their pay shall be retained subject to verification of academic documents/qualifications from the concerned Board/University by the District Education Officer concerned.
- c. Their services shall be considered regular and they shall be eligible for pension deduction of the fund in terms of the Khyber Pakhtunkhwa Civil Servants Act, 1973 as amended in 2017.
- d. Their services are liable to termination on one month's notice from either side. In case of resignation without notice, their one-month's pay allowances shall be forfeited to the Government.
- e. They shall possess the same qualification and experience required for a regular post.
- f. They shall have not resigned from their services or terminated from services on account of misconduct, inefficiency or any other ground before the commencement of this Act.
- g. Their regularization shall not affect the promotion quota of existing holders of posts in respective service cadres.
- h. They shall rank junior to all other employees belonging to the same cadre who are in regular basis on the commencement of this Act and shall also rank junior to such other persons who, in pursuance of the recommendation of the Khyber Pakhtunkhwa Public Service Commission made before the commencement of this Act are to be appointed to the posts, irrespective of their actual date of appointment.

(CONT. PAGE 2)

ATTEST

Their seniority shall be determined on the basis of their continuous service in cadre, provided that if the date of continuous service in the case of two or more employees is the same, the employee older in age shall rank senior to the younger one.

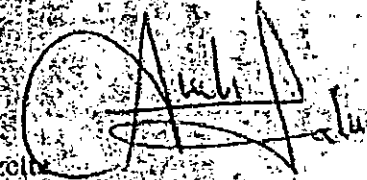
(3) All the appointing authorities in the Elementary & Secondary Education Department at all tiers shall issue regularization orders in r/o the employees falling within their competency and get those notified in the official gazette.

SECRETARY

Endst: of even No. & date:

Copy forwarded to the:

1. Accountant General Khyber Pakhtunkhwa, Peshawar.
2. All Directors, E&SE Khyber Pakhtunkhwa.
3. All District Education Officers (Male/Female) Khyber Pakhtunkhwa.
4. All District Accounts Officers Khyber Pakhtunkhwa.
5. In charge EMIS, E&SE Department for uploading at official website.
6. PS to Principal Secretary to Chief Minister, Khyber Pakhtunkhwa, Peshawar.
7. PS to Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
8. PS to Secretary, Provincial Assembly Khyber Pakhtunkhwa, Peshawar.
9. PS to Minister E&SE Khyber Pakhtunkhwa.
10. PS to Secretary, Establishment Department.
11. PS to Secretary E&SE Department.
12. PS to Additional Secretary (Estab) E&SE Department.
13. Office order file.
14. Manager Printing Press for notifying in the official gazette.



(ANEELA FAHIM)
SECTION OFFICER (SCHOOLS FEMALE)

SECRETARY

Annexure ..D (9)

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KARAK

NOTIFICATION

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Govt of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No. SO (B&A) 4-18/B & S 2012 dated 11.3.2012 and Finance Department Endst. No. SO(FR)/FD/10-22(I/F-2010) dated 16.7.2012 and further Notification Issued vide Director Elementary and Secondary Education Khyber Pakhtunkhwa Endst. No. 2895-2901/F.No. 1/Promotion SST (PSB-16) dated Peshawar the 25/02/2020, the following Male ATs BPS 15 are hereby Promoted to the Post of Senior AT BPS 16 (Rs. 18910-1520-64510) plus usual allowance as admissible to them under the rules on regular basis under the existing policy of the Provincial Government, in teaching cadre on the terms and condition given below with immediate effect and further they are hereby posted in the Govt. Higher Secondary School/High School in District Karak against the vacant/newly upgraded SAT BPS-16 Posts.

S. No.	Sen. No.	Name	School Where Worked	Date of Birth	Date of IM Regular Appoint on Present Post	School where posted as SAT Post BPS-16
1	27	Aziz Ullah Shah	GMS Siraj Khel	08-10-1968	01-4-1992	GHS Garang Siraj Khel
2	60	Rahat Ullah	GMS Kanda Baji Khel	05-01-1972	04-02-2005	GHSS Karak
Consequential transfer:						
		Name	From	To	Remarks	
		Sajid Hossain	GHS Garang Siraj Khel	GMS Siraj Khel	In place of S No 1	

TERMS AND CONDITIONS

1. The promotion is subject to the availability of one vacant post in the grade of Senior AT BPS-16 in the Government service at the time of the promotion.

2. The promotion is subject to the availability of one vacant post in the grade of Senior AT BPS-16 in the Government service at the time of the promotion.

3. The promotion is subject to the availability of one vacant post in the grade of Senior AT BPS-16 in the Government service at the time of the promotion.

4. The promotion is subject to the availability of one vacant post in the grade of Senior AT BPS-16 in the Government service at the time of the promotion.

5. The promotion is subject to the availability of one vacant post in the grade of Senior AT BPS-16 in the Government service at the time of the promotion.

6. The promotion is subject to the availability of one vacant post in the grade of Senior AT BPS-16 in the Government service at the time of the promotion.

7. The promotion is subject to the availability of one vacant post in the grade of Senior AT BPS-16 in the Government service at the time of the promotion.

8. The promotion is subject to the availability of one vacant post in the grade of Senior AT BPS-16 in the Government service at the time of the promotion.

9. The promotion is subject to the availability of one vacant post in the grade of Senior AT BPS-16 in the Government service at the time of the promotion.

10. The promotion is subject to the availability of one vacant post in the grade of Senior AT BPS-16 in the Government service at the time of the promotion.

10

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KARAK


NOTIFICATION

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Govt. of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.SO (B&A) /1-18/12 & S/2012 dated 11.7.2012 and Finance Department Endst No.SO(FR/FPD/10-22(E)-2010 dated 16.7.2012 and further Notification issued vide Director Elementary and Secondary Education Khyber Pakhtunkhwa Endst.No.2895-2901/F.No.1/Promotion SSI(PSB-16) dated Peshawar, the 25/02/2020, the following Male TTs BPS 15 are hereby Promoted to the Post of Senior TT BPS 16 ((Rs. 18910-1520-64510)) plus usual allowance as admissible to them under the rules on regular basis under the existing policy of the Provincial Government. In teaching cadre on the terms and conditions given below with immediate effect and further they are hereby posted in the Govt. Higher Secondary School/High School in District Karak against the vacant/newly upgraded STT BPS. 16 Posts.

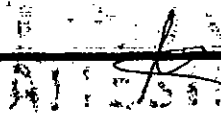
S.No.	Sen. No.	Name	School Where Working	Date of Birth	Date of 1st Regular Apptt. on Present Post	School where posted at STT Post BPS-16
1	51	Hafeez-Ur-Rellman	GHS Takht-e-Nasrati	09.4.1970	04.02.2005	GHS Kin Dhand
2	52	Tariq Masood	GMS Khada Banda	04.6.1976	04.02.2005	GHS Sarki Lawagher
3	53	All Bostan	GMS Shanwa Gadi Khe	02.3.1978	04.02.2005	GHS Gumbati mina Khel
Consequential Transfer						
S.No.	Name	From	To			
1	Muhammad Haroon	GHS Sarki Lawagher	GMS Khadda Banda	Against S.No. 2 as he promote to STT		

TERMS AND CONDITIONS

1. They would be on Probation for a period of one year extendable for another one year.
 2. They will be Governed by such rules and regulations as may be issued from time to time by the Govt.
 3. Their Services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of mis conduct he shall be proceeded under the rules framed from time to time.
 4. Charge Report should be submitted to all concerned.
 5. Their Inter Se Seniority on lower post will remain intact.
 6. No TADA etc is allowed for joining his duty.
 7. They will give an undertaking to be recorded in their Service Book 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.
- Note: Terms and conditions from S.No.1 to 7 are for promote teachers.

 19/3/2020

DISTRICT EDUCATION OFFICER



OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KARAK

11

NOTIFICATION

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Govt. of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.SO (B&A) 11-18/E & S /2012 dated 11.7.2012 and Finance Department Endst.No.SO(FR)/FD/10-22(E)-2010 dated 16.7.2012 and further Notification Issued vide Director Elementary and Secondary Education Khyber Pakhtunkhwa Endst.No.2895-2901/F.No.1/Promotion SST(PSB-16) dated Peshawar the 25/02/2020, the following Male DMs/BPS-15 are hereby Promoted to the Post of Senior DM/BPS-16 (Rs.18910-1520-64510) plus usual allowance as admissible to them under the rules on regular basis under the existing policy of the Provincial Government, in teaching cadre on the terms and condition given below with immediate effect and further they are hereby posted in the Govt Higher Secondary School/High School in District Karak against the vacant/newly upgraded SDM/BPS-16 Posts.

Sr	Sen No	Name	School Where Working	D/of Birth	Date of Ist Regular Apptt on Present Post	School where posted in SDM Post BPS-16
1	39	Muhammad Ishaq	GHS Mitha Khel	01.8.1968	25-12-1993	IGHS GMK Khel
2	40	Maqsood-Ur-Rehman	GHS Darish Khel	26.03.1967	25-12-1993	GHS Darish Khel
3	41	Khalil-Ur-Rehman	GHS Gundi Killa	01.10.1967	25-12-1993	GHS Khojak Killa
4	42	Hamid Ullah	GMS Zar Khan Killa	15.03.1968	25-12-1993	GHS Sarki Lawagher
5	43	Kaleem Ullah	GMS Karak City	16.01.1970	25-12-1993	GHSS Itappi Kanda
6	45	Muhammad Raziq	GHS Shah Salim	01.5.1972	16.11.1994	GHSTakht-e-Nosrat
Consequential transfer						
S.No	Name	From	To	Remarks		
	Nasir Khalil	GHS Jagat Khel	GMS Karak City	Against S.No.5 as he promoted to SDM		

TERMS AND CONDITIONS

- The promotion is subject to the approval of the Government of Khyber Pakhtunkhwa.
- The promotion is subject to the availability of the post in the Government of Khyber Pakhtunkhwa.
- The promotion is subject to the fulfillment of the conditions of service of the post to which promoted.
- The promotion is subject to the fulfillment of the conditions of service of the post to which promoted.
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- The promotion is subject to the fulfillment of the conditions of service of the post to which promoted.

Signature of District Education Officer (Male) Karak

12

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KARAK

NOTIFICATION

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Govt: of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.SO (B&A) 7-18/E & S /2012 dated 11.7.2012 and Finance Department Endst.No.SO(FR)/FD/10-22(E)-2010 dated 16.7.2012 and further Notification issued vide Director Elementary and Secondary Education Khyber Pakhtunkhwa Endst.No.2895-2901/F.No.1/Promotion SST(PSB-16) dated Peshawar the 25/02/2020, the following Male PETs BPS 15 are hereby Promoted to the Post of Senior PET BPS 16 ((Rs.18910-1520-64\$10)) plus usual allowance as admissible to them under the rules on regular basis under the existing policy of the Provincial Government, in teaching cadre on the terms and condition given below with immediate effect and further they are hereby posted in the Govt:Higher Secondary School/High School in District Karak against the vacant/newly upgraded SPET BPS. 16 Posts.

S.No	Sen No	Name	School Where Working	D of Birth	Date of 1st Regular Appt on Present Post	School where posted as SPET Post BPS-16
1	25	Muhamamad Nazir Khan	GMS Jangrizi	01.3.1972	25.5.1996	GHS Teri
2	30	HabibUllah	GMS Anar Banda	01.01.1968	13.5.1997	GHSS KandoKhel
3	41	Fazal Jan	GMS Jarasi	12.02.1970	11.5.1999	GHS SarkilLawagber
4	42	KhairUllah	GHS Thor Dhand	18.4.1976	06.01.2000	GHS GhundiKela

Consequential Transfer

S.No	Name	From	To	Remarks
1	UsmanUllah	GHSS KandoKhel	GHS Thor Dhand	Against S.No. 4 as he promoted to SPET
2	Imran Ullah	GHS SarkilLawagber	GMS Jangrzi	Against S.No. 1 as he promoted to SPET

TERMS AND CONDITIONS

1. They would be on Probation for a Period of one year extendible for another one year.
2. They will be Governed by such rules and regulations as may be issued from time to time by the Govt:
3. Their Services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of miss conduct, he shall be proceeded under the rules framed from time to time.
4. Change Report should be submitted to all concerned.
5. Their Inter-Se-Seniority on lower post will remain intact.
6. No TA/DA etc is allowed for joining his duty.
7. They will give an undertaking to be recorded in their Service Book 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 recovered.

17/3/2020

DISTRICT EDUCATION OFFICER (MALE) KARAK

Endst No 1312-89 AE-111/Promotion

Dated Karak the 19/03/2020

Copy to the:

To

The Director
KP Elementars & Secondary Education, Peshawar

Subject: Application for arranging DPC for senior CT of affected CTs i.e. -
Muhammad Ejaz Khan CT GHSS Jandari Karak.

Sir,

With due respect it is stated that I am a regular certified Teacher (CT) BPs-15 since 31-05-2014. I have been appointed on 31-05-2014 on adhoc basis and then became regularized on 19-03-2018 with effect from date of appointment i.e. 31-05-2014. But, all the CTs of 2014 of other districts except Karak district has been promoted to SET BPs-16 on account of completing five (5) years tenure, but I am deprived on the so promotion to SET in Karak district. Therefore, it is kindly requested that arrange a special DPC of SET in district Karak. I will be very thankful to you in the regard of this kindness.

Dated: -03-2020

Yours obedient

Muhammad Ejaz Khan CT

GHSS Jandari Karak

NIC No: 14202-2354274-3

Mob No: 03128210652

ADDE (M)

DD-1
For MSA
to
12/3/20
17/3/20



Anexure .. F" (14)

DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR.

No. 4368/F No. Promotion CT To SCT
Karak.
Dated Peshawar the 12/11 /2020.

The District Education Officer (M)
Karak.

Subject: - APPLICATION FOR REGARDING DPC FOR SENIOR CT OF AFFECTED
CTs IN RESPECT OF MUHAMMAD IJAZ KHAN CT GHSS JANDARI.

Memo:-

I am directed to refer to enclose herewith an application submitted to this office by Muhammad Ijaz CT GHSS Jandari District Karak, and to ask you to consider his case and regarding the subject matter in the next DPC subject to his Seniority -com fitness as per rules.

[Signature]
Assistant Director (Estab :)
Elementary & Secondary Edu:
Khyber Pakhtunkhwa Peshawar.

Endst: No. _____

Copy forwarded to the:-

1. P.A to Director Elementary and Secondary Education local office.

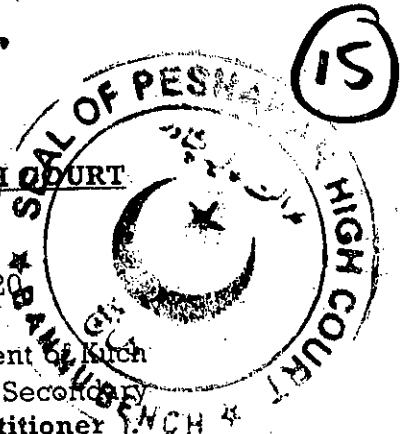
[Signature]
Assistant Director (Estab :)
Elementary & Secondary Edu:
Khyber Pakhtunkhwa Peshawar.

[Signature]

Annexure G

**BEFORE THE HONOURABLE PESHAWAR HIGH COURT
BANNU BENCH, BANNU.**

Writ Petition No. 1268-13 of 2020



[Handwritten signatures and initials]

Muhammad Ijaz Khan son of Noor Janan Resident of Kich Banda Presently posted as C.T at Govt: Higher Secondary School Jandari Tehsil & District, Karak. ----- (Petitioner)

26/01/2021

VERSUS

1. Govt: of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Khyber Pakhtunkhwa Civil Secretariat, Peshawar.
2. Director of Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Male), Karak (Respondents).

Addresses of the parties mentioned above are sufficient for proper service.

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

Respectfully Sheweth :-

FACTS:-

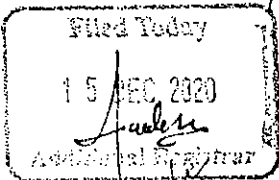
1. That initially the petitioner was appointed against the post of C.T BPS-15 vide appointment order dated 31/05/2014 in Education Department, Karak on adhoc basis on contract. ----- (Photocopy of appointment order is annexed as Annexure "A").

[Handwritten signature]

2. That under the provision of Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act 218 (Khyber Pakhtunkhwa Act No. 1 of 2018) in pursuance of the Govt: of KP Notification No. SO (S/F) E & SED/3-2/2018/SITT/Contract dated 16/02/2018, the services of petitioner was regularized in BPS-15 w.e.f initial appointment on the same post in Teaching Cadre on the terms and conditions mentioned therein vide Notification Endst: No. 1610-17/AE-II/CT Regularization 2018 dated Karak the 19/03/2018. ----- (Photocopy of Notification Endst: No. 1610-17/AE-II/CT Regularization 2018 dated Karak the 19/03/2018 is annexed as Annexure "B").

ATTESTED
EXAMINER
Peshawar High Court
Bannu Bench

3. That the promotion of petitioner to the post of S.C.T BPS-16 having completion five (05) years services on the post of C.T BPS -15 was due in D.P.C held on 11/11/2019 but the promotion of appellant being sole candidate in C.T post BPS-15 was dropped due to regularized the service of petitioner in the year 2018 and condition No. 7 of regularization order dated 19/03/2018.
4. That against non promotion to the post of S.C.T BPS-16 in D.P.C held on 11/11/2019, the petitioner filed departmental appeal on 12/03/2020 before the Director E & SED KP, Peshawar with the request to arrange special DPC of S.C.T in District, Karak being sole candidate. ----- (Photocopy of departmental appeal is annexed as **Annexure "C"**).
5. That in light of departmental appeal of petitioner the Director E & SED KP, Peshawar directed the District Education Officer (Male), Karak to consider the appellant for promotion in the next D.P.C vide letter No. 4368/F. No. Promotion CT to SCT Karak dated Peshawar the 12/06/2020. ----- (Photocopy of letter No. 4368/F. No. Promotion CT to SCT Karak dated Peshawar the 12/06/2020 is annexed as **Annexure "D"**).
6. That District Education Officer (Male), Karak has not honoured the directions of Director Elementary & Secondary Education Department, Peshawar mentioned under letter dated 12/06/2020 to consider the appellant in the next DPC.
7. That the worthy District Education Officer (Male), Karak failed to honour the directions of the worthy Director Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar, therefore, the petitioner is aggrieved and hence the instant writ petition before this honourable court on the following grounds.



Grounds.

- a. That the worthy District Education Officer (Male), Karak was the legal obligation to honour the directions of the worthy Director Elementary & Secondary Education Department, KP, Peshawar.
- b. That in next D.P.C which held on 19/10/2020 the worthy District Education Officer (Male), Karak was bound to first decide the promotion case of petitioner but he did not bother to give response of the directions of worthy Director E & SED KP, Peshawar.

APPEALED
Peshawar High Court
BANKER BUREAU

- c. That the worthy Director Elementary & Secondary Education Department KP, Peshawar has directed the DEO (M), Karak to consider the petitioner in the next D.P.C but the DEO (M), Karak is reluctant to consider the petitioner . .
- d. That without implementing the directions of the worthy Director E SED KP, Peshawar, the worthy District Education Officer (Male), Karak was no right to proceed the promotion case further.
- e. That due to inaction of the worthy District Education Officer (Male), Karak regarding the case of petitioner for promotion, the petitioner has sustained irreparable loss.
- f. That valuable rights of the petitioner is involved in the instant petition, therefore, the petitioners is constrained to file the instant writ petition before this honourable court .
- g. That any other point will be pressed at the time of argument with permission of this honourable court.

Prayer

So it is, therefore, most humbly and respectfully prayed that on acceptance of the instant writ petition, this honourable court may very graciously be pleased to issue appropriate directions to the worthy District Education Officer (Male), Karak to honour and implement the directions issued by the worthy Director Elementary & Secondary Department KP, Peshawar vide letter No. 4368/F. No. Promotion C.T to SCT Karak Dated Peshawar the 12/06/2020.

Dated:- 14/12/2020.

Petitioner *Muhammad Ijaz Khan*

Through *Mirzali Khan Khattak*
Advocate, (Karak).



Certificate

Certified that no such like writ petition has been filed earlier on similar ground before this Hon'able court or any other court.

Petitioner *Muhammad Ijaz Khan*

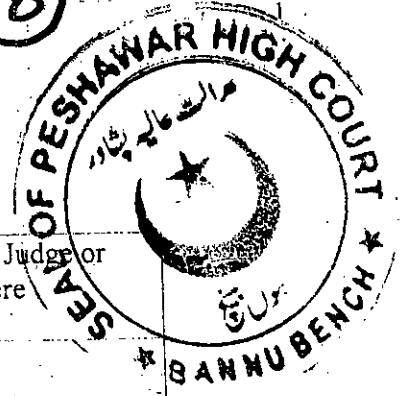
Law Books :-

1. Constitution of Pakistan 1973.
2. Case law according to need.

ATTESTED
EXAMINER
Peshawar High Court
Baranwali Bazar

18

FORM "A"
FORM OF ORDER SHEET



Date of order or proceedings	Order or other proceedings with signature of Judge or Magistrate and that of parties or counsel where necessary.
2. 19.01.2021	3. <u>W.P. No. 1268-B/2020.</u> <u>Present:</u> Mir Zali Khan Khattak advocate for petitioner. Mr. Shahid Hamid Qureshi, Addl: A.G for the State. ***** <u>MUSARRAT HILALI, J.</u> -Through the instant constitutional petition, petitioner has prayed for the following relief:- <i>"On acceptance of the instant writ petition, this Hon'ble court may very graciously be pleased to issue appropriate direction to the worthy District Education Officer (Male) Karak to honour and implement the directions issued by the worthy Director Elementary and Secondary Department KP, Peshawar vide letter No. 4368/F No. Promotion C.T to SCT Karak dated Peshawar the 12.6.2020."</i> 2- At the very out-set, learned counsel for petitioner stated at the bar that he would be satisfied, if this petition is disposed of with direction to concerned respondent No-3 for considering the petitioner on

Handwritten signature/initials

Imranullah PS (S.B) Hon'ble Justice Musarrat Hilali and Hon'ble Mr. Justice Sahibzada Asadullah

ATTESTED
Handwritten signature
JUNIOR CLERK
Peshawar High Court
Sannu Bench

19

honouring and implementing the directions issued by the worthy Director Elementary and Secondary Department KP, Peshawar vide letter No. 4368/F No. Promotion C.T to SCT Karak dated Peshawar the 12.6.2020 strictly in accordance with law.

3- Learned Addl: A.G present in court accepts notice in this case and expressed no objection on disposal of the petition as requested by the learned counsel for petitioner.

4- In the light of submission of counsel for petitioner and no objection from Addl: A.G, the instant writ petition is disposed of with direction to respondent No-3 to honour and implement the directions issued by the worthy Director Elementary and Secondary Department KP, Peshawar vide letter No. 4368/F No. Promotion C.T to SCT Karak dated Peshawar the 12.6.2020 strictly in accordance with law.

Announced
19.01.2021.

Man
JUDGE.

[Signature]
JUDGE

SCANNED
19 JAN 2021
Khaliq Khan

19/01/2021

CERTIFIED TO BE TRUE COPY

[Signature]
Examiner
Peshawar High Court Bannu Bench
Authorised Under Article 87 of

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE), KARAK.**OFFICE ORDER**

In compliance of the directions of Hon'able Peshawar High Court Bannu Bench, Bannu dated 19/01/2021 passed in Writ Petition No. 1268-B of 2020 titled "**Muhammad Ijaz V.S Govt. of KP etc**" to honour and implement the directions issued by the worthy Director Elementary and Secondary Education Department KP, Peshawar vide letter No. 4368-F No. Promotion CT to SCT Karak dated Peshawar the 12/06/2020 strictly in accordance with law.

Whereas the above mentioned named official claimed promotion S.CT. BPS-16 on the ground of completion of 05 years service on the post of C.T BPS-15 vide appointment order dated 31/05/2014 on adhoc cum contract

Whereas subsequently his services were regularized in BPS- 15 vide Regularization order dated 16/02/2018 from initial appointment Issued by the Elementary & Secondary Education Department KP, Peshawar which was Endorsed by District Education Officer (M), Karak dated 19/03/2018 vide Endst: No. 1610-17/AE-II/CT/Regularization.

Whereas DPC of other category of teaching posts was held on 11/11/2019 except CT BPS-15 to S.CT BPS-16 as there ^{was} no candidate of CT was due for promotion and so far the case of petitioner Muhammad Ijaz is concerned he was not entitled under Section-3 of Khyber Paktunkhwa Employees & Secondary Education Department (Appointment & Regularization of Service) Act, 2017.

Whereas seniority of CT. Teachers were up-dated in the year 2020 in which the above named official mentioned at S. No. 377 in seniority list whereas total 42 posts of S.CT were vacant for which DPC was held on 19/10/2020 and 42 C.T were approved to the post of S.CT BPS-16 vide approval order No. 2945-50/File No. 1 /Promotion SCT BPS-16 dated Peshawar the 08/12/2020 issued by the Director E & SED which was endorsed by District Education Officer (Male), Karak vide order No. 4559-63/Promotion /SCT dated Karak the 30/12/2020, therefore, the above named official was not eligible for promotion.

In light of the above aforesaid facts, the above named official Mr. Muhammad Ijaz C.T is not entitled for promotion to S.CT BPS-16.

ed
District Education Officer (Male),
Karak.

Endst: No 1317-18

Dated 29-3-21

1. Director Elementary & Secondary Education Department with reference letter No. 4368-F No. Promotion CT to SCT Karak dated Peshawar the 12/06/2020.

✓
2. Mr. Muhammad Ijaz C.T GHS Jandari.

29/3/21
District Education Officer (Male),
Karak. (M) Karak

Office of the District Education Officer Male Karak
Updated seniority List of SCT/CT

Seniority No	Name	Father's Name	BPS	School Where Working	Designation	Subject in BA/BSC/BS	Division in BA	subject in MA	B.Ed/M.Ed	Date of result Declaration B.Ed	D/O Birth	Date of Ist. Appnt:	Date of T/over Charge in the present post as CT	Date of Declaration CT/Trained as CT	Date of T/over charge in this Distt.	Date of T/over charge in this Distt. on present post CT	Date of promot: in the present post i/e/ trained teacher	NTS Marks	Remarks
1	Shad Muhammad	Ghulam Qadir Khan	16	GHS Ganderi Khattak	SCT	Eng+Isl edu	3rd	Nil	Nil	27/05/80	1-Jan-61	20-Dec-81	21-Dec-81		21-Dec-81	5-Oct-83	21-Dec-81		
2	Mansoor Mateen	Noor Mateen	16	GHSS Karak	SCT	Eng+Isl edu	2nd	Nil	Nil		10-Apr-61	20-Feb-82	21-Feb-82	14-Oct-80	21-Feb-82	4-Sep-86	21-Feb-82		
3	Hanif Ullah	Gul Faraz Khan	16	GHS khurram	SCT	Eng+Isl Edu	3rd	Nil	Nil		10-Feb-62	4-Apr-83	5-Apr-83			7-Sep-01	7-Sep-01	5-Apr-83	
4	Muhammad Yasin	Jan Mir	16	GHSS Jahangiri	SCT	Eng+Isl edu	3rd	Pashto	B.Ed, M.Ed	5-Mar-94	15-Mar-64	8-Dec-83	10-Dec-83	10-Dec-83	13-Sep-94	10-Dec-83			Promoted to S. CT Forgo
5	Jamil Ur Rehman	Mir Nawaz Khan	16	GHSS Bogara	SCT	Eng+Isl edu	2nd	Islamayat	B.Ed	8-May-94	15-Feb-62	31-Mar-81	7-Mar-84	7-Mar-84	18-Nov-90	7-Mar-84			
6	Fayyaz Ahmad	Said Ghulam	16	GHS Ganderi Khattak	SCT	Eng+Isl edu	2nd:	Nil	DAE		13-Jan-64	23-Oct-84	30-Oct-84		16-Feb-91	16-Feb-91	30-Oct-84		
7	Nawaz Khan	Muhammad Khan	16	GHSS Nardhanos	SCT	Eng+Isl Edu	2nd:	Nil	Nil		16-Dec-61	24-Sep-87	20-Sep-87	16-Feb-81	3-Oct-85	10-Oct-85	10-Oct-85		
8	Akmal Khan	Mawiz Shah	16	GHS Saran Khattak	SCT	Eng+Isl Edu	2nd:	Nil	Nil		23-Aug-63	23-Nov-82	10-Jun-87	26-Sep-87	25-Sep-85	14-Jul-86			
9	Muhammad Ali Khan	Habib Ullah Jan	15	GHS Manzini	SCT	Eng+Isl edu	2nd:	Nil	Nil	17/3/94	3-Mar-64	21-Sep-86	21-Sep-86		21-Sep-86	21-Sep-86	21-Sep-86		
10	Zafar Rehman	M Ahmad Khan	16	GHS Garang Siraj Khel	SCT	Eng+Isl Edu	2nd:	Nil	Nil	26/5/87	1-May-62	21-Nov-81	23-Nov-81	26-May-87	26-May-87	3-Dec-88	27-May-87		
11	Rauf Khan	Muhammad Ghani	16	GHSS Jehangiri	SCT	Eng+Isl Edu	2nd:	Nil	Nil		1-Feb-61	7-Nov-84	18-Nov-84	12-Sep-87	12-Sep-87	30-Nov-89	12-Sep-87		
12	Sadiq Nawaz	Shahwaz Khan	16	GHS Town Committee	SCT	Eng+Isl Edu	3rd	Nil	Nil		10-Oct-64	12-Sep-87	14-Sep-87	2-Sep-87	14-Sep-87	17-Dec-89	14-Sep-87		
13	Mir Pio Khan	Gul Said Khan	16	GHS Bangi Killa	SCT	Eng+Isl edu	2nd:	Nil	Nil		9-Sep-62	8-Mar-82	20-Sep-87		20-Sep-87	16-Dec-89	20-Sep-87		
14	Rehman Ullah	Sheza Ahmad Khan	15	GHS Yamuk Khel	SCT	Eng+Isl Edu	2nd:	Nil	Nil		22-Dec-62	15-Sep-87	20-Sep-87	13-Aug-87	20-Sep-87	19-Feb-92	20-Sep-87		
15	Shamshad Ali	Muhammad Zar Ali	16	GHS Takht e Nasrati	SCT	Eng+Isl edu	2nd:	Pashto	B. Ed	12-Aug-02	4-Apr-65	19-Sep-87	20-Sep-87	13-Aug-87	20-Sep-87	19-Feb-92	20-Sep-87		
16	Mukhtar Ali	Mir Ghazi Khan	16	GHSS Bogara	SCT	Eng+Isl edu	2nd:	Nil	Nil		15-Jan-67	19-Sep-87	20-Sep-87		20-Sep-87	20-Sep-87	20-Sep-87		
17	Khalid Rehman	Awal Khan	16	GHSS Karak	SCT	Eng+Isl edu	3rd	Nil	Nil		4-Feb-64	19-Sep-87	22-Sep-87	13-Aug-87	22-Sep-87	22-Sep-87	22-Sep-87		
18	Iftikhar ul Mulk	Munawar Jan	16	GHS Bangi Killa	SCT	Eng+Isl edu	3rd	Nil	Nil	6-May-96	15-Apr-62	20-Oct-87	21-Oct-87		21-Oct-87	27-Apr-88	21-Oct-87		
19	Saleh Ullah	Abdul Hamid Khan	16	GHS Surati Killa	SCT	Eng+Isl edu	2nd:	Nil	Nil		15-Apr-62	5-Oct-80	12-Oct-80	29-Nov-87	12-Nov-90	13-Nov-90	29-Nov-87		
20											3-Feb-63								
21	Riayat Khan	Sailani	16	GCMHS Chokara	SCT	Eng+Isl Edu	2nd:	English	B. Ed	5-Oct-93	23-Oct-63	8-Dec-87	9-Dec-82	29-Nov-87	29-Nov-87	2-Sep-03	29-Nov-87		BA 3rd and second BA from Al-Khair
22	Muhammad Maqsood	Juntaraz Khan	16	GHSS Karak	SCT	Eng+Isl Edu	BA 3rd	Pashto,Urdu	B. Ed, M. Ed	6-May-96	19-Dec-63	28-Nov-83	1-Dec-83	29-Nov-87	29-Nov-87	3-Nov-86	29-Nov-87		
23	Murtez Khan	Maisal Khan	16	GHS Takht e Nasrati	SCT	Eng+Isl edu	3rd	Nil	Nil		2-Apr-61	2-May-84	3-May-84	1-Aug-88	1-Aug-88	3-Dec-88	1-Aug-88		
24	Muhammad Raziq	Mehtar Suliman	16	GHS Rehmat Abad	SCT	Eng+Isl edu	3rd	Pol: Sci, Islamayat	M. Ed	29-Oct-98	1-May-63	2-Nov-86	4-Nov-86	17-Sep-88	17-Sep-88	23-Aug-89	17-Sep-88		
25	Akhtar Zaman	Raibat Khan	16	GHS Ahmad Abad	SCT	Eng+ Isl Edu	2nd	Nil	B. Ed, M. Ed	29-Apr-93	20-Mar-64	26-Jan-84	26-Jan-84	31-Jan-89	31-Jan-89	21-Aug-89	31-Jan-89		BA Al-Khair
26	Kamal ur Rehman	Khan Mir	16	GHS Gurguri	SCT	Eng+ Statistite	2nd	Pashto	B. Ed	27-Oct-92	1-Jan-66	22-Oct-89	25-Oct-89	1-Oct-88	25-Oct-89	1-Oct-88	25-Oct-89		Correction made in BA Division

Seniority	Name	Father's Name	Age	School Where Working	Designation	Subject in BA/BSC/RS	Division in BA	Subject in MA	B.Ed/M.Ed	Date of 1st Declaration B.Ed.	Date of Birth	Date of 1st Apptt:	Date of T/over Charge in the present post as CT	Date of Declaration CT/Trained as CT	Date of T/over charge in this Distt:	Date of T/over charge in this Distt: on present post CT	Date of T/over charge in this Distt: on present post i-/trained teacher	NTS Marks	Remarks
356	Zafar Ali Khan	Daud Khan	15	GHS Garang Siraj Khel	CT	Engl+Econ	2nd	Economics	B.Ed, M.Ed		15-Sep-81	9-Mar-06	25-Sep-17			25-Sep-17	25-Sep-17		
357	Sajid Tahseen Ahunad	Muhammad Riaz	15	GHS Daresh Khel	CT	Phy+Maths	2nd	Maths	B.Ed, M.Ed		1-Nov-84	9-Mar-06	21-Sep-17				21-Sep-17		
358	Mohib Ullah	Gul Faraz Khan	15	GMS Ahmad Khel	CT	Engl+Urdu	2nd	Pashto	B.Ed		10-Apr-85	9-Mar-06	21-Sep-17				21-Sep-17		
359	Javid Iqbal	Awal Muhammad	15	GHS Ghundi Killa	CT	Engl+Isl Edu	2nd	Islamayat	B.Ed		12-May-73	24-Jul-06	23-Sep-17			23-Sep-17	23-Sep-17		
360	Aziz Ur Rahunan	Amir Sabir Rahman	15	GMS Wanki siraj Khel	CT	B.com	2nd	M.Com	Nil		1-Jan-75	25-Jul-06	22-Sep-17			22-Sep-17	22-Sep-17		
361	Adil Zaman	Sattar Jan	15	GMS Zebi Chani Khel	CT	Engl+Isl Edu	2nd	Nil	B.Ed		1-Apr-84	31-Jul-06	22-Sep-17				22-Sep-17		
362	Falak Naz	Janat Amin	15	GMS Jarasi	CT	Engl+Isl Edu	2nd	Nil	B.Ed		1-Jan-79	24-Jul-06	22-Sep-17				22-Sep-17		
363	Ibrar Khan	Munawar shah	15	GHS Surdok	CT	Engl+Isl Edu	2nd	Urdu	B.Ed		3-Feb-80	24-Jul-06	21-Sep-17				21-Sep-17		
364	Muhammad Jamal	Imam Saddique	15	GMS Jattan Banda	CT	Engl+Isl Edu	2nd		B.Ed		1-Aug-82	25-Jul-06	21-Sep-17				21-Sep-17		
365	Javid Iqbal	Mir Pio Khan	15	GMS Yaqoobi Killa	CT	Eng+Isl Edu	2nd	English	B.Ed		1-Feb-73	24-Jul-06	23-Sep-17				23-Sep-17		
366	Shahid Iqbal	Laiq-Ur-Rehman	15	GHS Dagar Nari	CT	Engl+Isl Edu	2nd	Islamayat, Arabic	B.Ed		31-Dec-80	24-Jul-06	21-Sep-17				21-Sep-17		
367	Siraj Ullah	Hajat Khan	15	GHS Dagar Nari	CT	Engl+Isl Edu	2nd	Pak. Study, Pol.Sc	B.Ed, M.Ed		10-Sep-83	24-Jul-06	21-Sep-17				21-Sep-17		
368	Mohsin Ali Khan	Abdul Manan	15	GHS Sabir Abad	CT	Engl+Isl Edu	2nd	Pol.Sc	B.Ed		12-May-79	31-Jul-06	21-Sep-17				21-Sep-17		
369											4-Oct-79								
370	Muhammad Ikhtiar	Pir Bad Shah	15	GMS Sarat Khel	CT	Engl+Isl Edu	2nd	Islamayat	B.Ed		13-Mar-80	31-Jul-06	22-Sep-17				22-Sep-17		
371	Azdullah	Abat Khan	15	GHS Paloski	CT	Engl+Isl Edu	2nd	Islamayat	Nil		15-Dec-74	24-Jul-06	21-Sep-17				21-Sep-17		
372	Muhammad Hashim	Muhammad Khan	15	GMS W.M. Hassan Khel	CT	Engl+Isl Edu	2nd		B.Ed		6-Apr-76	31-Jul-06	21-Sep-17						
373											20-Jan-77								
374	Asghari Ali Khan	Darood Akber	15	GMS Sabir Abad	CT	Engl+Isl Edu	2nd	Islamayat	B.Ed, M.Ed		2-Jan-79	31-Jul-06	23-Sep-17				23-Sep-17		B.Ed, M.Ed Al-Khair
375	Noor Muhammad Khan	Imam Gul	15	GHS Sabir Abad	CT	Engl+Isl Edu	2nd	Islamayat	B.Ed		10-Apr-81	31-Jul-06	21-Sep-17				21-Sep-17		
376	Sadiq Menhas	Zulfa Mir	15	GMS Ashkari Ali khel	CT	Eng+ Isl Edu	2nd	Urdu	Nil		13-Apr-84	24-Jul-06	22-Sep-17				22-Sep-17		

377	Muhammad Ijaz Khan	Noor Janan	15	GHS Ghunda Shamshaki	CT	Engl+Isl Edu	1st	Islamayat	Nil		7-Aug-89	31-May-14	31-May-14				31-May-14	130.94	
378	Muhammad Zahoor	Khan Wali Khan	15	GHSS Chanda Khurram	CT	Engl+Isl Edu	1st	English	B.Ed		1-Mar-87	14-Mar-15	17-Mar-15				17-Mar-15	132.15	
379	Muhammad Shoaib Anwar	Muhammad Anwar	15	GHSS Chanda Khurram	CT	Phy+Maths	2nd	Physics, M.Phil	B.Ed		16-Jun-85	14-Mar-15	17-Mar-15				17-Mar-15	131.44	
380	Waheed Ullah	Abdul Ghani Khan	15	GHS Jatta Ismail Khel	CT	BS Elect Eng	1st	BS Elect Eng	Nil		30-May-91	14-Mar-15	14-Mar-15				8-Oct-15	129.05	
381	Muhammad Tayyab	Ali Jan	15	GHS Tarki Khel	CT	Phy+Maths	1st	Physics	Nil		10-Apr-88	14-Mar-15	19-Mar-15				19-Mar-15	128.13	

Promotion of senior teachers of District Bannu

**DISTORATE OF ELEMENTRY AND SECONDARY EDUCATION KHYBER
PAKHTUNKHWA PESHAWAR**

NOTIFICATION:

Consequent upon the recommendation of departmental promotion committee and in pursuance of the government of Khyber pakhtunkhwa elementary and secondary education notification No.SO(B&A)1-18/E&SE/2012 dated 11.07.2012 and finance department endorsement No.SO(FR)FD/10-22(E)2010 dated 16.07.2012, the following CT (male) are promoted to the post of Senior CT in BPS-16 (Rs.18910-1520-64510), plus usual allowance as admissible under the rules on regular basis under the existing policy of the provincial government on the terms and condition given below with immediate effect and further they will be adjusted by District education officer concerned.

**ITEM NO.1 PROMOTION OF CT (BPS-15) MALE TO THE POST OF SCT (BPS-16)
ON REGULAR BASIS.**

TERMS AND CONDITIONS:-

(HAFIZ DR. MUHAMMAD IBRAHIM)

DIRECTOR

**Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.**

**Endst: No.3845-51/file No.1/pro: Senior Teachers (BPS-16) dated Peshawar
the 28.2.2020**

DEO M Bannu

Promotion of Senior Teachers of District Bannu

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DIRECTORATE OF ELEMENTARY AND SECONDARY
EDUCATION KHYBER PAKHTUN KHAWA PESHAWAR.

Annexure J

Notification

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.SO(B&A)/1-18/E&SE/2012 dated 11.7.2012 and Finance Department Endorsement No.SO(FR)/FD/10-22(E)2010 dated 16.7.2012, the following CT (Male) are promoted to the posts of Senior CT in BPS-16 (Rs.18910-1520-64510), plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and conditions given below with immediate effect, and further they will be adjusted by the District Education Officer concerned.

ITEM No.1 PROMOTION OF CT (BPS-15) MALE TO THE POST OF SCT (BPS-16) ON REGULAR BASIS

Total No. of Sanctioned Post of CT	824
1/3 Share of SCT Posts	275
Share of Promotion Quota of SCT	100%
Already Promoted to SCT	212
Posts Available for Promotion to SCT	63
Proposed CT for Promotion to SCT	47

The Court Stay is vacated in Civil Appeal No.12/1, dated 30.11.2019/ 8.1.2020 in the Court of Civil Judge NoVI, Bannu & in Civil Appeal No 132/1, dated 8.11.2019 in the Court of Civil Judge No.VI, Bannu, and with decisions dates as Order No.5, 27.2.2020 and Order No.12, 27.2.2020 respectively.

Sl#	Sn #	Name of Official	Name of School	Date of Birth	Date of Apptt: as Regular CT	Qual:	Remarks
1	520	Sajadullah Khan	GHS Hakim Bharat	14.9.1981	16.5.2014	MBA, IT, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
2	522	Khair Ullah Khan	GMS Zaman Wazir	10.4.1988	16.5.2014	MA, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
3	524	Irshad Ahmad Shah	GHS Khujari Baber	17.4.1987	16.5.2014	MSc, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
4	525	Shah Qiaz Khan	GMS Umer Khan Mama Khel	20.3.1987	16.5.2014	MSc, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
5	526	Zewran Ullah Khan	GMS Piran Daud Shah	12.9.1986	16.5.2014	M.Phil M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect

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Promotion of Senior Teachers of District Bannu

6	523	Abdul Khan	GMS Dilnawaz Dad Kachkot	18.4.1989	16.5.2014	M.Com M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
7	530	Rafi Ullah	GHS No.3 Bannu City	5.9.1978	16.5.2014	M.Sc. M.Ed. PhD	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
8	533	Zia-ul-Haq	GHS No.2 Bannu City	27.3.1980	16.5.2014	Phd, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
9	534	Noor Zali Khan	GMS Tarket Zergar Mama Khel	14.3.1985	16.5.2014	MA, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
10	535	Ansar Ullah Khan	GMS Sabu Khel Guli Kala	8.10.1985	16.5.2014	MS, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
11	536	Asif Mehmood	GMS Allah Dad Mamash Khel	22.4.1978	16.5.2014	MPA, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
12	537	Gul Andaz Khan	GMS Hassan Khel Kheraki	3.3.1988	16.5.2014	M.Sc, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
13	538	Farman Ullah Khan	GMS Shaheed Baba	30.8.1984	16.5.2014	M.Phil, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
14	539	Wahid Ullah Khan	GMS No.2 Bannu	30.3.1979	16.5.2014	MA, B.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
15	540	Shah Fayaz Khan	GHS Adnan Sardi Khel	5.2.1987	16.5.2014	MA, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
16	541	Farooq Shah	GHS Domanza Bizan Khel	6.4.1985	16.5.2014	MA, B.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
17	542	Rehman Ullah Khan	GHSS Ismail Khel		16.5.2014	Phd, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
18	548	Farhan Shah	GMS Piran Doud Shah	22.9.1982	16.5.2014	MA, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
19	544	Muhib-ur-Rehman	GMS Hassani Darah-Shahr	20.4.1987	16.5.2014	M.Sc, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect

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Promotion of Senior Teachers of District Bannu

20	545	Munammad Shoaib Amjad	GMS Alimat Khatakan	25.3.1988	16.5.2014	M.Sc, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
21	546	Adnan Khan	GMS Muhammad Khan Killa	10.7.1987	16.5.2014	MA, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
22	547	Khurshid Nawaz	GHS Khujari Babar	21.2.1988	16.5.2014	MA, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
23	548	Shah Zeb Ullah	GHS Dilasa Khan Mandw	15.4.1988	16.5.2014	B.SSE, Hon. M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
24	549	Hidayat Ullah	GHS Khdry Muhammad Khel	1.3.1986	16.5.2014	M.Sc, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
25	550	Haroon Khan	GHSS Comp Bannu	5.9.1983	16.5.2014	MA, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
26	551	Ihsan Ullah	GMS Guli Killa Sabo khel	5.2.1984	16.5.2014	M.Sc, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
27	552	Gul Fayaz Khan	GMS Adami Rasool Khan	3.1.1988	16.5.2014	M.Sc, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
28	553	Bakhtiar Ali Khan	GMS Inam Tughal Khel	12.4.1982	16.5.2014	MA, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
29	554	Farman Ullah Khan	GMS Ghamber Bannu	25.3.1986	16.5.2014	MBA, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
30	555	Kamran Khan	GMS Kachozai Bannu	1.3.1982	16.5.2014	M.Phil, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
31	556	Gul Zail Khan	GHSS Comp Bannu	3.1.1982	16.5.2014	M.Sc, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
32	557	Shahid Ali Shah	GMS Behram G Gari Mamash Khel	13.4.1983	16.5.2014	M.Sc, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
33	558	Muhammad Imran Ali Shah	GMS Asadi Khujari	25.10.1980	16.5.2014	MA, M.Phil, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect

Promotion of Senior Teachers of District Bannu

34	559	Imran Khan	GMS Gul Jawar Domel	10.8.1984	16.5.2014	MBA, B.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
35	560	Ali Rehman Khan	GMS Hassan Khel Kheraki	5.4.1986	16.5.2014	MSc, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
36	561	Muhammad Ayaz	GHS Murib Khel Baka Khel	15.3.1985	16.5.2014	MSc, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
37	562	Muhammad Nasir	GMS Kausar Fatah Khel	15.1.1987	16.9.2014	MSc, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
38	563	Kher Muhammad	GMS Khuwajamad Landidak	3.3.1989	16.5.2014	MSc, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
39	564	Ibrar Ullah Khan	Ghs Dogar Umerzai	15.1.1990	16.5.2014	MSc, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
40	565	Asghar Ali Khan	GMS Nurur Khas	16.2.1984	16.5.2014	MA, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
41	566	Sher Ullah	GHSS Painda Khel	19.9.1988	16.5.2014	MA, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
42	567	Shakil Nawz Khan	GMS Kabir Khurgai Domel	4.3.1982	16.5.2014	MA, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
43	568	Zakir Ullah Khan	GMS Ribat Khan Bharat	13.4.1988	16.5.2014	MA, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
44	569	Shahi Kamran	GHS No.2 Bannu	4.9.1988	16.5.2014	MA, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
45	570	Nasrullah Khan	GMS Mirzali Gul Badin Lanidak	25.10.1988	16.5.2014	MA, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
46	571	Maqsood Khan	GMS Bazida Yousaf Khan	20.9.1981	16.5.2014	MA, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
47	572	Ghulam Rehman	GCMS For Boys Bannu	27.7.1983	16.5.2014	M.Phil, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect

Terms and Conditions:-

1. They would be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt
3. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their Inter-Se- seniority on lower post will remain intact.
6. No TA/DA is allowed for joining their duty.
7. They will give an under taking to be recorded in their service books to the effect that if any over payment is made to them in the light of this order will be recovered and if they are wrongly promoted they will be reversed.
8. Before handing over charge their documents may be checked. If they have not the required relevant qualifications as per rules, they may not be handed over charge of the post

(Hafiz Dr. Muhammad Ibrahim)

Director

Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst: No 3845-51 / File No.1/Pro: Senior Teachers(BPS-16) Dated Peshawar the 28/1/2022

Copy forwarded for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar
2. District Education Officer (M) Bannu
3. District Accounts Officer Bannu
4. Officials Concerned
5. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department
6. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar
7. M/File

Deputy Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

District Education Officer
(Male) Bannu



DISTRICT EDUCATION OFFICER (MALE) BANNU

28

OFFICE ORDER

Consequent upon the recommendation of the Department Promotion Committee and in pursuance of the Govt. of Khyber Pakhtunkhwa Elementary & Secondary Education Department Notification No So (B8A)/1-18/E&SE/2012 Dated: 11/07/2012 & Finance Department Khyber Pakhtunkhwa Peshawar Endst: No.SO(FR)/FD/10-22(E/2010 Dated 16-07-2012 & Director Elementary & Secondary Education Khyber Pakhtunkhwa Endst No.3845-51/F.No.1/Promotion SCT B-16 Dated Peshawar the 28-02-2020 the following Male CTs B-15 are hereby promoted to the post of Senior CT B-16 (Rs.18910-1520-64510) plus usual allowances as admissible under the rules on regular basis under the existing policy of the provincial Govt. for teaching Cadre on the terms & conditions given below with immediate effect.

S#	S.No	Name of Teacher with Designation & BPS	Present posting as CT B-15	Place of Posting as Senior CT B-16	Remarks
1	520	Sajad Ullah Khah CT B-15	GHS Hakim Bharat Bannu	GHS Hakim Bharat Bannu	The Post of CT B-15 Upgraded to SCT B-16
2	522	Khairullah Khah CT B-15	GMS Zaman Mazir Daud Shah Bannu	GHS Kachkot Asad Khan Bannu	The Vacant Post of CT B-15 GHS Kachkot Asad Khan Bannu Upgraded to SCT B-16
3	524	Irshad Ahmad Shah CT B-15	GHS Khujari Babar Bannu	GHS Khujari Babar Bannu	The Post of CT B-15 GHS Khujari Babar Bannu Upgraded to SCT B-16
4	525	Shah Qiaz Khan CT B-15	GMS Umer Khan Mama Khel Bannu	GHS Nar Shukorullah Khan Bannu	AVP SCT B-16
5	526	Zewnan Ullah Khan CT B-15	GMS Piran Daud Shah Bannu	GHS No.2 Bannu	AVP SCT B-16
6	528	Iqbal Khan CT B-15	GMS Dilnawaz Dadkachkot Bannu	GCMS For Boys Bannu	The vacant Post of CT B-15 GCMS for Boys Bannu upgraded to SCT B-16.
7	530	Rafiullah Khan CT B-15	GHS No.3 Bannu	GHS No.3 Bannu	The Post of CT B-15 GHS No.3 Bannu Upgraded to SCT B-16
8	533	Zia Ul Haq CT B-15	GHS No.2 Bannu	GHS No.2 Bannu	The Post of CT B-15 GHS No.2 Bannu Upgraded to SCT B-16
9	534	Noor Zali Khan CT B-15	GMS Tarkat Zargar Mama Khel Bannu	GHSS Mama Khel Banochi Bannu	Mr: Noor Ayaz Khan CT B-15 GHS Mamakhel Banochi Bannu Adjusted to GMS Tarkat Zargar Mama Khel Bannu at S.No.09 & The Post of CT B-15 GHSS Mama Khel Banochi Upgraded to SCT B-16
10	535	Ansar Ullah CT B-15	GMS Sabo Khel Guli Killa Mandan	GHS Bahadar Manak Khel Bannu	Mr: Muhammad Hussan CT B-15 GHS Bahadar Manak Khel Bannu Adjusted at GMS Dil Nawaz Dad Kachkot Bannu Against the Vacant Post of CT B-15 & the Post of CT B-15 GHS Bahadar Manak Khel Upgraded to SCT B-16
11	536	Asif Mehmood CT B-15	GMS Allah Dad Mamash Khel Bannu	GHS No.1 Bannu	Mr: Ishtiaq Ahmad CT B-15 GHS No.1 Bannu City Adjusted to GMS Allah Dad Mamash Khel Bannu at S.No.11 and the Post of CT B-15 GHS No.1 Bannu City upgraded to SCT B-16.
12	537	Gul Andaz Khan CT B-15	GMS Hassan Khel Kharaki Bannu	GHS Mamoki Dardariz Bannu	AVP SCT B-16
13	538	Fermanullah Khan CT B-15	GMS Shaheed Baba Bannu	GHS Sikandar Bharat Bannu	The Vacant Post of CT B-15 GHS Sikandar Bharat Bannu Upgraded to SCT B-16
14	539	Wahidullah Khan CT B-15	GMS No.2 Tanchi Bazar Bannu	GCMS for Boys Bannu	Mr: Ashraf Ali Shah CT B-15 GCMS for Boys Bannu Adjusted at GMS No.2 Bannu City at S.No.14 and the Post of CT B-15 GCMS for Boys Bannu Upgraded to SCT B-16
15	540	Shah Fayaz Khan CT B-15	GMS Adnan Sardi Khel Bannu	GHS Adnan Sardi Khel Bannu	The Post of CT B-15 GHS Adnan Sardi Khel Bannu Upgraded to SCT B-16
16	541	Farooq Shah CT B-15	GHS Domanza Bizan Khel Bannu	GHS Ghoriwala Bannu	AVP SCT B-16

Dusmit Library System
(G.M.A.)

18	542	Rehmanullah Khan	CT B-15	GHSS Ismail Khel Bannu	GHSS Ismail Khel Bannu	The Post of CT B-15, GHSS Ismail Bannu upgraded to SCT B-16
18	543	Farhan Shah	CT B-15	GMS Piran Daud Shah Bannu	GHS No.2 Bannu	AVP SCT B-16
19	544	Muhib Ur Rehman	CT B-15	GMS Hassani Dará Shah Bannu	GHS S.K.Bala Bannu	AVP Against CT B-16
20	545	Muhammad Shoaib Amjed	CT B-15	GMS Alimat Khatakkán Bannu	GHS No.1 Bannu	Mr: Hamid Nawab CT B-15 GHS No.1 Bannu City adjusted to GMS Guli Killa Sabo Khel Mandan Bannu at S.No.18 and the Post of CT B-15 GHS No.1 Bannu upgraded to SCT B-16.
21	546	Adnan Khan	CT B-15	GMS Muhammad Khan Kakki Bannu	GHS Toor Kakki Bannu	The Vacant Post of CT B-15 GHS Toor Kakki Bannu upgraded to SCT B-16
22	547	Khurshid Nawaz	CT B-15	GMS Khujari Babar Bannu	GHS Khujari Babar Bannu	The Post of CT B-15 GHS Khujari Babar upgraded to SCT B-16
23	548	Shah Zeb Ullah	CT B-15	GHSS Dilsa Khan Mandew Bannu	GHSS Dilsa Khan Mandew Bannu	The Post of CT B-15 GHSS Dilsa Khan Mandew Bannu upgraded to SCT B-16
24	549	Hidayat Ullah	CT B-15	GHS Khadri Muhammad Khel Bannu	GHS Khadri Muhammad Khel Bannu	AVP SCT B-16
25	550	Haroon Khan	CT B-15	GHSS Comp: Bannu	GHS Syed Tughal Khel Bannu	Mr: Munammad Tariq Khan CT B-15 GHS Syed tughal Khel, Adjusted to GMS Inam Tughal Khel Bannu Against a Vacant Post of CT B-15 and the of CT GHS Syed Tughal Khel Bannu upgraded to S.Ct. B-16
26	551	Ihsanullah Khan	CT B-15	GMS Guli Killa Sabokhel Mandan Bannu	GHS Bahadar Manak Khel Bannu	Mr: Feroz Khan CT B-15 GHS Bahadar Manak Khel Bannu adjusted to GMS Guli Killa Sabo Khel Mandan Bannu at S.No.26 and the Post of CT GHS Bahadar Manak Khel Bannu upgraded to SCT B-16.
27	552	Gul Fayaz Khan	CT B-15	GMS Adami Rasool Khan Bannu	GHS Ghoriwala Bannu	AVP SCT B-16
28	553	Bakhtiar Ali Khan	CT B-15	GMS Inam Tughal Khel Bannu	GHS Nar Shukorullah Khan Bannu	AVP SCT B-16
29	554	Farmanullah Khan	CT B-15	GMS Chambar Bannu	GHS Hassan Khel Jaffar Khan Bannu	Mr: Nahidullah Khan CT B-15 GHS Hassan Khel Jaffar Khan adjusted to GMS Adami Rasool Khan Bannu against the Vacant post of CT B-15 and the Post of CT B-15 GHS Hassan Khel Jaffar Khan Bannu upgraded to SCT B-16.
30	555	Kanran Khan	CT B-15	GMS Kachozai Bannu	GHS Kachkot Asad Khan Bannu	Mr: Muhammad Jaffar Shah CT B-15 GHS Kachkot Asad Khan Bannu, adjusted to GMS Bangi Khel Surrani Bannu against the Vacant (Add) Post of CT B-15 and the Post of CT B-15 GHS Kachkot Asad Khan Bannu : upgraded to SCT B-16.
31	556	Gul Zali Khan	CT B-15	GHSS Comp: Bannu	GHSS Comp: Bannu	AVP SCT BPS-16
32	557	Shahid Ali Shah	CT B-15	GMS Behram Chighri Mamash Khel Bannu	GHSS Mamash Khel Bannu	The Vacant Post of CT B-15 GHSS Mamash Khel Bannu upgraded to B-16
33	558	Muhammad Imran Ali Shah	CT B-15	GMS Asad Khujari Bannu	GHS Barati Machan Khel Bannu	Mr: Sher Ghafer Khan CT B-15 GHS Barati Machan Khel Bannu Adjusted to GMS Admi Sultan Shah Bannu Against the vacant Post of CT B-15 and the Post of CT B-15 GHS Barati Machan Khel Bannu upgraded to SCT B-16
34	559	Imran Khan	CT B-15	GMS Gul Jawar Donel Bannu	GHS Wali Zar Killa Bannu	AVP SCT B-16
35	560	Ali Rehman	CT B-15	GMS Hassan Khel Kharaki Bannu	GHS Hukum Zad Dardariz Bannu	Mr: Abdul Tawab Khan CT B-15 GHS Hukum Zad Dardariz Bannu Adjusted to GMS Khwajamad Landidak Bannu at S.No.38 and the Post of CT B-15 GHS Hukum Zad Dardariz Bannu upgraded to SCT B-16
36	561	Muhammad Ayaz	CT B-15	GHS Murib Khel Baka Khel Bannu	GHS Murib Khel Baka Khel Bannu	The Post of CT B-15 GHS Murib Khel Baka Khel Bannu Upgraded to SCT B-16
37	562	Muhammad Nasir	CT B-15	GMS Kausar Fateh Khel Bannu	GHS Kinger Jan Bahadar Bannu	AVP SCT B-16

563	Kher Muhammad	CT B-15	GMS Khwajamad Landidak Bannu	GHS Naimat Ghar Landidak Bannu	Mr: Samiullah Khan CT B-15 GHS Namit Ghar Landidak Adjusted at GMS Mirzali Gulbadin Landidak at S.No.45 and the post of CT B-15 GHS Naimat Ghar Landidak Bannu Upgraded SCT B-16
39 564	Ibrar Ullah Khan	CT B-15	GMS Doghar Umerzai Bannu	GHS Jhando Khel Bannu	AVP SCT BPS-16
40 565	Asghar Ali Khan	CT B-15	GMS Nurar Khas Bannu	GHS Mumbati Barakzai Bannu	AVP SCT B-16
41 566	Sher Ullah Khan	CT B-15	GHSS Paimda Khel Bannu	GHSS Paimda Khel Bannu	The Post of CT B-15 GHSS Paimda Khel Bannu Upgraded to SCT B-16
42 567	Shakil Nawaz	CT B-15	GMS Kabir Ghrgai Bannu	GHSS Domel Bannu	AVP SCT B-16
43 568	Zakirullah Khan	CT B-15	GMS Ribat Khan Bharat Bannu	GHS Khujari Babar Bannu	Mr: Shoaib Ahmad Shah CT B-15 GHS Khujari Babar adjusted to GMS Ribat Khan Bharat Bannu at S.No.43 and the Post of CT B-15 GHS Khujari Babar Bannu Upgraded to SCT B-16.
44 569	Shahi Kamran	CT B-15	GHS No.2 Bannu	GHS No.2 Bannu	The Post of CT B-15 GHS No.2 Bannu Upgraded to SCT B-16
45 570	Nasurullah Khan	CT B-15	GMS Mirzali gulbadin Landidak Bannu	GHSS Hakim Haved Bannu	Mr: Hamzullah Khan CT B-15 GHSS Hakim Haved Bannu adjusted to GMS Aslam Khan Dardariz Bannu against the vacant Post of CT B-15 and the Post of CT B-15 GHSS Hakim Haved Bannu Upgraded to SCT B-16
46 571	Maqsood Khan	CT B-15	GMS Bazida Yousaf Khan Bannu	GHS Sikander Khel Bala Bannu	AVP SCT B-16
47 572	Ghulam Rehman	CT B-15	GCMS For Boys Bannu	GCMHS For Boys Bannu	The Post of CT B-15 GCMHS For Boys Bannu Upgraded to SCT B-16

Terms & Conditions

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

(Attullah Khan Mina Khel)
District Education Officer
(Male) Bannu

Endst: No.2626-80 AE-I/CT/SCT Male/Estab: Dated.29/02/2020

Copy for information and N/A to the:-

- 1 PS to Secretary Elementary & Secondary Education Khyber Pakhtunkhawa Peshawar.
- 2 PS to Director Elementary & Secondary Education Khyber Pakhtunkhawa Peshawar.
- 3 Deputy District Education Officer (Male) Bannu
- 4 District Account Officer Bannu.
- 5 The Head of Institutions Concerned Schools in Bannu.
- 6 Teachers Concerned for strict compliance & report.
- 7 EMIS local Office /DMO Bannu with the coraction of data in your reports & Sengindes

District Education Officer
(Male) Bannu
District Education Officer
(Male) Bannu

Taj Murad

APPROVED

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR.

Service appeal No. 4968 of 2021

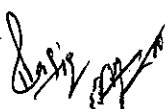
Muhammad Ijaz (Appellant)

VERSUS

Govt: of KPK & etc (Respondents)

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Respondent No. 3
District Education Officer
(Male), Karak.

Deputy District Education Officer
(Male)
District Education Officer
(Male) Karak

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR.

Service appeal No. 4968 of 2021

Muhammad Ijaz (Appellant)

VERSUS

Govt: of KPK & etc)

Parawise Written Comments Respondent No. 2 & 3 are as under

Respectfully Sheweth

Written comments on behalf of Respondent No 2 & 3

Preliminary Objections:-

1. That appellant has got no cause of action and locus standi to file the instant service appeal.
2. That the above titled service appeal is wrong, incorrect and against the law & facts
3. That the appellant is estopped to file the instant service appeal by his own conduct .
4. That the instant service appeal is not maintainable & entertainable in its present form.
5. That the appellant has not come to this honourable court with clean hands and concealed the real facts.
6. That the instant service appeal is liable to be dismissed due to mis-joinder & non-joinder of the necessary and proper parties.
7. That the instant service appeal is liable to be dismissed in being based by law and limitation.

District Education Officer
(Male) Karak

Ijaz

Factual Objections:-

1. Para No. 1 pertains to record.
2. Para No. 2 pertains to record.
3. Para No. 3 is incorrect and wrong. Further reply of this para is that DPC of other category of teaching posts was held on 11/11/2019 except CT BPS-15 to S.CT BPS-16 as there was no candidate of CT for promotion and so far the case of appellant is concerned he was not entitled under Section-3 of Khyber Paktunkhwa Employees & Secondary Education Department

(Appointment & Regularization of Service) Act, 2017. Further it is stated that in Regularization Notification dated 19/03/2018 (Annexure-B) S. No. 7 of Terms & Condition is very much clear.

4. Para No. 4 pertains to record, however, it is further stated that in light of order dated 19/01/2021 of Hon'able Peshawar High Court Bannu Bench passed in W.P No. 1268-B of 2020 titled " Muhammad Ijaz V.S Govt: of KPK directed the DEO (Male), Karak to implement the directions of Director E & SED, Peshawar contained in letter No. 4368/F .No. Promotion CT to SCT Karak dated Peshawar the 12/06/2020, The District Education Officer (Male), Karak issued office order vide No. 29/03/2021 that the appellant was not eligible for promotion from C.T BPS-15 to S.CT BPS-16 in light of Para No. 7 of Khyber Paktunkhwa Employees & Secondary Education Department (Appointment & Regularization of Service) Act, 2017.
5. Para No. 5 pertains to record, however, detailed reply was given in Para No. 4.
6. Para No. 6 is incorrect and wrong.

Objection on Grounds:-

- A. Incorrect. As per condition No. 7 mentioned in Regularization Notification dated 19/03/2018 the appellant is less eligibility criteria for promotion. Details reply is given in Para- 4 & 5 above.
- B. Incorrect. The appellant has been treated according to law and rules and further stated that as per Regularization Notification dated 19/03/2018 the appellant was not eligible for promotion to SCT BPS-16.
- C. Incorrect. The appellant although have requisite qualifications but as per Regularization Notification dated 29/03/2018 the appellant was not entitled to be promoted to SCT BPS-16 from C.T BPS-15.
- D. Incorrect and wrong. Details reply is given in the above mentioned Paras.
- E. Incorrect and wrong. Detail reply is given in reply on facts.
- F. Incorrect and wrong hence denied. Further stated that the respondent No. 3 (DEO(M), Karak) vide office order dated 19/03/2021 has implemented the order of Hon'able Peshawar High Court dated 19/01/2021 and followed the directions of


District Education Officer
(Male) Karak

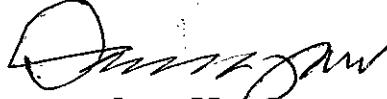


respondent No. 2 (Director E & SED KP, Peshawar) dated 12/06/2020.

G. No comments.

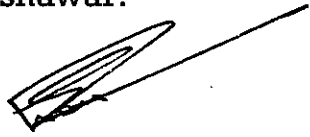
It is, therefore, most humbly and respectfully prayed that keeping in view the above mentioned para-wise written comments, the subject service appeal may pleased be dismissed.

Dated:- -----/12/2021




Respondent No. 2

Director, E & S Edu: Deptt:
KP, Peshawar.



Respondent No. 3

District Education Officer
(Male), Karak.

 District Education Officer
(Male) Karak

Annexure B (5)

C.T

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KARAK.

NOTIFICATION.

Under the provision of the Khyber Pakhtunkhawa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act 2018 (Khyber Pakhtunkhawa Act No.I of 2018), In pursuance the Govt. of Khyber Pakhtunkhawa Notification No. SO (S/F)E & S ED / 3-2/2018/SITT/Contract, dated 16.2.2018, Services of the following CT appointed on adhoc basis on contract, are hereby regularized in BPS 15 on the same post in Teaching cadre on the terms and condition given below with effect from the date of their appointment on the C.T Post:

No.	Year	Name	Father Name	Domicile	Date of Birth	CNIC No	Total Marks out of 200	School where posted	Appointment order and Date
1	2014	Muhammad Ejaz Khan	Noor Janan	Karak	7.8.1989	14202-2354274-3	130.94	GHS Ghunda Shamshaki	No.1724-26 dt 3.5.2014
1	2015	Muhammad Zahoor	KHAN WALI KHAN	KARAK	01.03.1987	142038277021-3	132.45	GHS CHANDA KHURRAM	NO.916-20 DATED.14.03.2015
2	2015	Muhammad Shoaib Anwar	MUHAMMAD ANWAR	KARAK	16.06.1985	14202-7214363-1	131.44	GHS CHANDA KHURRAM	NO.916-20 DATED.14.03.2015
3	2015	Waheed Ullah	ABDUL GHANI KHAN	KARAK	13.05.1991	14203-7006352-1	120.05	GHS JATTA ISMAIL KHEL	NO.916-20 DATED.14.01.2015
4	2015	Muhaminad Tayyeb	ALI JAN	KARAK	10.04.1988	14202-5130003-1	128.13	GHS TARKL KHEL	NO.916-20 DATED.14.01.2015
5	2015	Shaheen Ullah KHAN	HAKIM RAHMAN	KARAK	03.08.1978	14202-9121204-7	127.62	GHS DARESH KHEL	NO.916-20 DATED.14.03.2015
6	2015	Muhammad Farooq	MAMREZ KHAN	KARAK	11.04.1982	14203-7865735-5	124.48	GHS SHAHIDAN CHONTRA	NO.916-20 DATED.14.03.2015
7	2015	Waqar	HAJIB KHAN	KARAK	20.04.1986	14202-4662339-1	124.41	GHS DABB SANGEENI	NO.916-20 DATED.14.03.2015
8	2015	Haroon Iqbal	SAR ANJAM KHAN	KARAK	02.06.1987	14203-2251548-1	124.25	GHS TERJ	NO.916-20 DATED.14.03.2015
9	2015	Muhammad Jamil	GHULAM NABI	KARAK	03.03.1985	14202-1354339-7	123.6	GHS DABB	NO.916-20 DATED.14.03.2015
10	2015	Naqib Ullah	SHAHISTA KHAN	KARAK	05.01.1991	14202-5677158-7	123.56	GHS MAMI KHEL	NO.916-20 DATED.14.03.2015
11	2015	Kashif Adnan	IQBAL BAD SHAH	KARAK	04.05.1988	14203-1292162-9	122.65	GHS DHAND EDAL KHEL	NO.916-20 DATED.14.03.2015
12	2015	Amjad Rehman	AMAL KHAN	KARAK	12.01.1986	14203-6785468-9	122.28	GHS ESAK KHUMARI	NO.916-20 DATED.14.03.2015

FILED

6

AND CONDITIONS.

1. The regularization will not be in favour of those, who have not taken over charge Or his remained absent from duty are resign from service and also not for those who are under disciplinary proceedings.
2. Their Services shall be governed by the Khyber Pakhtunkhwa civil Servant Act 1973, the Khyber Pakhtunkhwa (Appointment, Deputation, Posting and transfer of teachers, Lecturers, Instructors' and Doctors) regularity Act 2011 and such rules and regulations as may be issued from time to time by the Government.
3. Their Pay shall be released subject to the verification of Academic and professional documents and testimonials from the concerned Boards/Universities by this Office.
4. Their services will considered regular and they shall be eligible for pension / deduction of GP Fund and terms of the Khyber Pakhtunkhwa Act 1973 as amended in 2013.
5. Their services is liable to termination on one month notice from either side. In case of resignation without notice, their one month pay/allowance shall be forfeited to the Government.
6. They shall possess the same Qualifications and experience required for the subject post on regular basis.
7. Their regularization shall not effect the promotion quota of the existing holders of posts in respective service cadre.
They shall rank Junior to all civil Servants belonging to the same service Or cadre, as the case may be, who are in Service on regular basis on the Govt. of the Khyber Pakhtunkhwa employees on the Elementary and Secondary Education (Appointment in regularization of Services) Act, 2018 (Khyber Pakhtunkhwa Act No.1 2018) and shall also rank Junior to such other persons, if any, who in pursuance of the recommendations of the Khyber Pakhtunkhwa Public service commission made before the commencement of the Act, are to be appointed to the respective Service Or cadre, in respect of their actual Date of appointment.
8. Their Seniority shall be Determined on the basis of their continues services in cadre. Provided that if the date of continues Service in case of Two Or more as the same, the employee elder in age shall rank Senior to the younger one.

19/03/18
 DISTRICT EDUCATION OFFICER
 (MALE) KARAK

Endst.No. 1610-17 / AE-II/CT Regularization 2018.

dated Karak the 29/3 /2018.

~~Copy forwarded for information and necessary action to the:-~~

1. PA to Director Elementary and secondary Education Khyber Pakhtunkhawa Peshawar.
2. PS to Secretary to Govt. of Khyber Pakhtoonkhawa Elementary and Secondary Education Khyber Pakhtoon Khawa Peshawar.
3. Deputy Commissioner Karak.
4. All the Principal/Head Master GHSS, GHS, GMS in District Karak.
5. DMO Karak.
6. B & A O Local Office.
7. EMIS Section Local Office.
8. Official Concerned.

19/03/18
 DISTRICT EDUCATION OFFICER
 (MALE) KARAK.

INTD



GOVERNMENT OF
KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Anxure C

7

Dated Peshawar, the February 16th, 2018

NOTIFICATION

NO. SOIS/PE/SE/ED/3-2018/SET/C (1) In pursuance of Section 3 of the Khyber Pakhtunkhwa Employees of Elementary & Secondary Education (Appointment, Regularization of Services) Act, 2011, read with Section 3 Sub-section (1) of the Act and the Department Government of Khyber Pakhtunkhwa advice bearing No. MS/11/1074 dated 09/08/2017, services of the following employees are hereby regularized with effect from the date of their initial appointment:

- i. Teachers appointed on adhoc or contract basis by the Elementary & Secondary Education Department in the government schools after 2013 through NTA but not including the teachers engaged on work share basis or who are not covered contingents.
- ii. Employees appointed in the following projects on contract basis in accordance with the project policy:
 - a. IT Computer Teacher in Computer Labs Projects in Khyber Pakhtunkhwa (Phase-II) (110558)
 - b. Establishment of five hundred (500) IT Labs in GCISSS Khyber Pakhtunkhwa (150559)
 - c. Establishment of five hundred (500) IT Labs in GCISSS Khyber Pakhtunkhwa (Phase-III) (160154)
- iii. Junior Clerks appointed in the E&S/ED by government after 2013 the date of their

(2) TERMS & CONDITIONS:

- a. Their services shall be governed by the Khyber Pakhtunkhwa Civil Servants Act, 1973, the Khyber Pakhtunkhwa (Appointment, Depuration, Posting & Transfer of Teachers, Lecturers, Instructors & Doctors) Regulatory Act, 2011, and such rules & regulations as may be made from time to time by the government.
- b. Their pay shall be released subject to verification of academic documents/terminalities from the concerned Board/ University by the District Education Officer concerned.
- c. Their services shall be considered regular and they shall be eligible for pension deduction of the fund in terms of the Khyber Pakhtunkhwa Civil Servants Act, 1973 as amended in 2013.
- d. Their services are liable to termination on one months notice from either side. In case of resignation without notice, their one months pay/ allowances shall be forfeited to the Government.
- e. They shall possess the same qualification and experience required for a regular post.
- f. They shall have not resigned from their services or terminated from services on account of misconduct, inefficiency or any other ground before the commencement of this Act.
- g. Their regularization shall not affect the promotion quota of existing holders of posts in the service cadre.
- h. They shall rank junior to all other employees belonging to the same cadre who are in regular basis on the commencement of this Act and shall also rank junior to such other persons who in pursuance of the recommendation of the Khyber Pakhtunkhwa Public Service Commission made before the commencement of this Act are to be appointed to the posts irrespective of their actual date of appointment.

ATTESTED

8

11/11/2011
The date of birth in the lists of their continuous service in cadre position in the date of continuous service in the case of two or more employees is the same, the employee older in age shall rank senior to the younger one.

(3) All the appointing authorities in the Elementary & Secondary Education Department at all tiers shall issue regularization orders in r/o the employees falling within their competency and get those notified in the official gazette.

SECRETARY

Enclst: of even No. & date:

Copy forwarded to the:

1. Accountant General Khyber Pakhtunkhwa, Peshawar.
2. All Directors, E&SE Khyber Pakhtunkhwa.
3. All District Education Officers (Male: Female) Khyber Pakhtunkhwa.
4. All District Accounts Officers Khyber Pakhtunkhwa
5. In charge EMIS, E&SE Department for uploading at official website.
6. PS to Principal Secretary to Chief Minister, Khyber Pakhtunkhwa, Peshawar.
7. PS to Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
8. PS to Secretary, Provincial Assembly Khyber Pakhtunkhwa, Peshawar.
9. PS to Minister E&SE Khyber Pakhtunkhwa.
10. PS to Secretary, Establishment Department.
11. PS to Secretary E&SE Department.
12. PS to Additional Secretary (Estab) E&SE Department.
13. Office order file.
14. Manager Printing Press for notifying in the official gazette.


(ANEELA FAHIM)
SECTION OFFICER (SCHOOLS FEMALE)

Anwar D

9

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KARAK

NOTIFICATION

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Govt. of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No. SO (B&A) 1-18 F & S 2012 dated 11.7.2012 and Finance Department Endst. No. SO(FR)FD-10-22(I)-2010 dated 16.7.2012 and further Notification Issued vide Director Elementary and Secondary Education Khyber Pakhtunkhwa Endst.No.2895-2901/F.No.1/Promotion SST(PSB-16) dated Peshawar the 25/02/2020, the following Male ATs BPS 15 are hereby Promoted to the Post of Senior AT BPS 16 (RS 18910-1520-64510) plus usual allowance as admissible to them under the rules on regular basis under the existing policy of the Provincial Government, in teaching cadre on the terms and condition given below with immediate effect and further they are hereby posted in the Govt. Higher Secondary School High School in District Karak against the vacant/newly upgraded SA I BPS 16 Posts

S.No.	Sen. No.	Name	School Where Working	D.of Birth	Date of 1st Regular Appnt. on Present Post	School where posted as SA I Post BPS-16
1	27	Atta Ullah Shah	GMS Siraj Khel	06-10-1968	01-4-1992	GHS Garang Siraj Khel
2	60	Rahat Ullah	GMS Kanda Baji Khel	05-01-1972	04-02-2005	GHSS Karak
Consequential transfer						
		Name	From	To		Remarks
1		Sabir Hayat	GHS Garang Siraj Khel	GMS Siraj Khel		In place of S.No.1

TERMS AND CONDITIONS

1. They would be on Probation for a Period of one year extendable for another one year
2. They will be Governed by such rules and regulation as may be issued from time to time by the Govt.
3. Their Services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of miss conduct, he shall be proceeded under the rules framed from time to time
4. Change Report should be submitted to all concerned.
5. Their Inter-Se-Seniority on lower post will remain intact.
6. No TA/DA etc is allowed for joining his duty.
7. They will give an under taking to be recorded in their file. Hook 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 it will be reversed.

19/3/2020
DISTRICT EDUCATION OFFICER (MALE) KARAK

10

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KARAK

NOTIFICATION

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Govt. of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No SO (B&A) /I-TR/E & S/2012 dated 11.7.2012 and Finance Department Endst No SO (TR/MD/10-22(E)-2010 dated 16.7.2012 and further Notification Issued vide Director Elementary and Secondary Education Khyber Pakhtunkhwa Endst No.2895-2901/P.No.1/Promotion SST(PSB-16) dated Peshawar the 25/02/2020, the following Male TTs BPS 15 are hereby Promoted to the Post of Senior TT BPS 16 ((Rs.18910-1520-64510)) plus usual allowance as admissible to them under the rules on regular basis under the existing policy of the Provincial Government, in teaching cadre on the terms and conditions given below with immediate effect and further they are hereby posted in the Govt./Higher Secondary School/High School in District Karak against the vacant/newly upgraded STT BPS 16 Posts.

S.No.	Sen. No.	Name	School Where Working	D/of-Birth	Date of Ist. Regular Appnt. on Present Post.	School where posted at STT Post BPS-16
1	51	Muhammad Rafiq	GHS/Takht-e-Nasrati	09.4.1970	04.02.2005	GHS Kiri Dhandh
2	52	Muhammad Masood	GMS Khadda Banda	04.6.1976	04.02.2005	GHS Sarki Lawagher
3	53	Ali Bostan	GMS Shanwa Gudi Khe	02.3.1978	04.02.2005	GHS Gumbati mina Khel
Consequential Transfers						
S.No.	Name	From	To			
1	Muhammad Haroon	GHS Sarki Lawagher	GMS Khadda Banda	Against S.No. 2 as he promote to STT		

TERMS AND CONDITIONS

1. They would be on probation for a period of one year extendable for another one year.
 2. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
 3. Their services can be terminated at any time in case his performance is found unsatisfactory during probationary period. In case of misconduct he shall be proceeded under the rules framed from time to time.
 4. Charge Report should be submitted to all concerned.
 5. Their rank as Senior TT in lower post will remain intact.
 6. No LWD/AV is allowed for joining his duty.
 7. They will give an undertaking to be recorded in their Service Book 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.
- Note: Terms and conditions from S.No.1 to 7 are for promote teachers

[Signature]
19/3/2020

DISTRICT EDUCATION OFFICER

ATTESTED

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KARAK

11

NOTIFICATION

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Govt. of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No. SO (B&A) /1-18/E & S /2012 dated 11.7.2012 and Finance Department Order No. SO (FRYFD/10-22(E)-2010 dated 16.7.2012 and further Notification issued vide Director Elementary and Secondary Education Khyber Pakhtunkhwa Order No. 2895-2901/F.No.1/Promotion SST(PSB-16) dated Peshawar the 25/02/2020, the following Male DMs BPS-15 are hereby Promoted to the Post of Senior DM BPS-16 ((R. 18910-1520-64510)) plus usual allowance as admissible to them under the rules on regular basis under the existing policy of the Provincial Government, in teaching cadre on the terms and condition given below with immediate effect and further they are hereby posted in the Govt. Higher Secondary School/High School in District Karak against the vacant/newly upgraded SDM BPS-16 Posts.

S #	Sen No	Name	School Where Working	D/of Birth	Date of 1st Regular Appnt on Present Post	School where posted in SDM Post BPS-16
1	39	Muhammad Ishaq	GHS Mitha Khel	01.8.1968	25-12-1993	GHS GMK Khel
2	40	Maqsood-Ur-Rehman	GHS Darish Khel	25.03.1967	25-12-1993	GHS Darish Khel
3	41	Khalil-Ur-Rehman	GHS Gundi Killa	01.10.1967	25-12-1993	GHS Khojak Killa
4	42	Hamid Ullah	GMS Zari Khan Killa	15.03.1968	25-12-1993	GHS Sari Lawaghor
5	43	Kaleem Ullah	GMS Karak City	16.01.1970	25-12-1993	GHS Sappal Kanda
6	45	Muhammad Raziq	GHS Shah Salem	01.5.1972	16.11.1994	GHS Tah-e-Nasrat
Consequent Transfer						
S.No	Name	From	To	Remarks		
	Nadir Khalil	GHS Najat Kandi	GMS Karak City	Against S.No:5 as he promoted to SDM		

TERMS AND CONDITIONS

1. The promotion of the candidates mentioned in the above table is subject to the availability of the posts in the grade to which they are promoted.

2. The promotion of the candidates mentioned in the above table is subject to the availability of the posts in the grade to which they are promoted.

3. The promotion of the candidates mentioned in the above table is subject to the availability of the posts in the grade to which they are promoted.

4. The promotion of the candidates mentioned in the above table is subject to the availability of the posts in the grade to which they are promoted.

5. The promotion of the candidates mentioned in the above table is subject to the availability of the posts in the grade to which they are promoted.

6. The promotion of the candidates mentioned in the above table is subject to the availability of the posts in the grade to which they are promoted.

7. The promotion of the candidates mentioned in the above table is subject to the availability of the posts in the grade to which they are promoted.

8. The promotion of the candidates mentioned in the above table is subject to the availability of the posts in the grade to which they are promoted.

9. The promotion of the candidates mentioned in the above table is subject to the availability of the posts in the grade to which they are promoted.

10. The promotion of the candidates mentioned in the above table is subject to the availability of the posts in the grade to which they are promoted.

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12

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KARAK

NOTIFICATION

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Govt. of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No SO (B&A) 4-18/E & S 2012 dated 11.7.2012 and Finance Department Endst.No.SO(FR/FD/10-22(E)-2010 dated 16.7.2012 and further Notification issued vide Director Elementary and Secondary Education Khyber Pakhtunkhwa Endst.No.2895-2901/F-No.4/Promotion SST(PSB-16) dated Peshawar the 25/02/2020, the following Male PETs BPS 15 are hereby Promoted to the Post of Senior PET BPS 16 ((Rs.18910-1520-64510)) plus usual allowance as admissible to them under the rules on regular basis under the existing policy of the Provincial Government, in teaching cadre on the terms and condition given below with immediate effect and further they are hereby posted in the Govt:Higher Secondary School/High School in District Karak against the vacant/newly upgraded SPET BPS. 16 Posts.

S.No	Sen. No	Name	School Where Working	D of Birth	Date of 1st Regular Appn on Present Post	School where posted as SPET Post BPS-16
1	25	Muhammad Nazir Khan	GMS Jangrizi	01.3.1972	25.5.1996	GHS Ten
2	30	HabibUllah	GMS Anar Banda	01.01.1968	13.5.1997	GHSSKandoKhel
3	41	Fazal Jan	GMS Jansa	12.02.1970	11.5.1999	GHS SarkiLawagher
4	42	KhairUllah	GHS Thor Dhand	18.4.1976	06.01.2000	GHS GhundiKela

Consequential Transfer

S.No	Name	From	To	Remarks
1	UsmanUllah	GHSS KandoKhel	GHS Thor Dhand	Against S.No. 4 as he promoted to SPET
2	Imran Ullah	GHS SarkiLawagher	GMS Jangrzi	Against S.No. 1 as he promoted to SPET

TERMS AND CONDITIONS

1. They would be on Probation for a Period of one year extendable for another one year.
2. They will be Governed by such rules and regulation as may be issued from time to time by the Govt.
3. Their Services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of miss conduct, he shall be proceeded under the rules framed from time to time.
4. Charge Report should be submitted to all concerned.
5. Their Inter-Se-Seniority on lower post will remain intact.
6. No TA/DA etc is allowed for joining his duty.
7. They will give an undertaking to be recorded in their Service Book, 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 Reverted.

17/3/2020

DISTRICT EDUCATION OFFICER (MALE) KARAK

Endst. No. 1382-89 / A.E./M/Promotion

Dated Karak the 19/03/2020

Copy to the:

To

The Director
KP Elementars & Secondary Education, Peshawar

Subject: Application for arranging DPC for senior CT of affected CTs i.e. o
Muhammad Ejaz Khan CT GHSS Jandari Karak.

Sir,

With due respect it is stated that I am a regular certified Teacher (CT) BPs-15 since 31-05-2014. I have been appointed on 31-05-2014 on adhoc basis and then became regularized on 19-03-2018 with effect from date of appointment i.e 31-05-2014. But all the CTs of 2014 of other districts except Karak district has been promoted to SET BPs-16 on account of completing five (5) years tenure, but I am deprived on the so promotion to SET in Karak district. Therefore, it is kindly requested that arrange a special DPC of SET in district Karak. I will be very thankful to you in the regard of this kindness.

Dated: -03-2020

Yours obedient

Muhammad Ejaz, Khan CT

GHSS Jandari Karak

NIC No: 14202-2354274-3

Mob No: 03128210652

ADDE(M)

DD-1 filed
for 25/3
12/3/20
17/3/20



Annxure .. F .. (14)

DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR.

No. 4368/F. No. Promotion CT To SCT
Karak.
Dated Peshawar the 12/11 /2020.

The District Education Officer (M)
Karak.

Subject: - APPLICATION FOR REGARDING DPC FOR SENIOR CT OF AFFECTED
CTs IN RESPECT OF MUHAMMAD IJAZ KHAN CT GHSS JANDARI.

Memo:-
I am directed to refer to enclose herewith an application submitted to this office by
Muhammad Ijaz CT GHSS Jandari District Karak, and to ask you to consider his case and
regarding the subject matter in the next DPC subject to his Seniority -com fitness as per rules.

[Signature]
Assistant Director (Estab :)
Elementary & Secondary Edu:
Khyber Pakhtunkhwa Peshawar.

Endst: No. _____

Copy forwarded to the:-

1. P.A to Director Elementary and Secondary Education local office.

[Signature]
Assistant Director (Estab :)
Elementary & Secondary Edu:
Khyber Pakhtunkhwa Peshawar.

[Signature]

Annexure G

**BEFORE THE HONOURABLE PESHAWAR HIGH COURT
BANNU BENCH, BANNU.**

Writ Petition No. 1268-13 of 2020

Muhammad Ijaz Khan son of Noor Janan Resident of Kitch
Banda Presently posted as C.T at Govt: Higher Secondary
School Jandari Tehsil & District, Karak. ----- (Petitioner)

VERSUS

1. Govt: of Khyber Pakhtunkhwa through Secretary
Elementary & Secondary Education Khyber
Pakhtunkhwa Civil Secretariat, Peshawar.
2. Director of Elementary & Secondary Education Khyber
Pakhtunkhwa, Peshawar.
3. District Education Officer (Male), Karak
(Respondents).

Addresses of the parties mentioned above are sufficient for proper service.

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

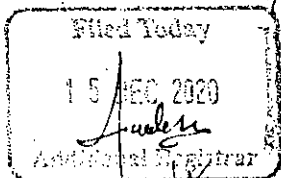
Respectfully Sheweth :-

FACTS:-

1. That initially the petitioner was appointed against the
post of C.T BPS-15 vide appointment order dated
31/05/2014 in Education Department, Karak on adhoc
basis on contract. ----- (Photocopy of
appointment order is annexed as Annexure "A").
2. That under the provision of Khyber Pakhtunkhwa
Employees of the Elementary and Secondary Education
(Appointment and Regularization of Services) Act 218
(Khyber Pakhtunkhwa Act No. 1 of 2018) in pursuance
of the Govt: of KP Notification No. SO (S/F) E & SED/3-
2/2018/SITT/Contract dated 16/02/2018, the services of
petitioner was regularized in BPS-15 w.e.f initial
appointment on the same post in Teaching Cadre on
the terms and conditions mentioned therein vide
Notification Endst: No. 1610-17/AE-II/CT Regularization
2018 dated Karak the 19/03/2018. ----- (Photocopy of
Notification Endst: No. 1610-17/AE-II/CT Regularization
2018 dated Karak the 19/03/2018 is annexed as
Annexure "B").

ATTESTED
EXAMINER
Peshawar High Court
Bannu Bench

3. That the promotion of petitioner to the post of S.C.T BPS-16 having completion five (05) years services on the post of C.T BPS -15 was due in D.P.C held on 11/11/2019 but the promotion of appellant being sole candidate in C.T post BPS-15 was dropped due to regularized the service of petitioner in the year 2018 and condition No. 7 of regularization order dated 19/03/2018.
4. That against non promotion to the post of S.C.T BPS-16 in D.P.C held on 11/11/2019, the petitioner filed departmental appeal on 12/03/2020 before the Director E & SED KP, Peshawar with the request to arrange special DPC of S.C.T in District, Karak being sole candidate. ----- (Photocopy of departmental appeal is annexed as **Annexure "C"**).
5. That in light of departmental appeal of petitioner the Director E & SED KP, Peshawar directed the District Education Officer (Male), Karak to consider the appellant for promotion in the next D.P.C vide letter No. 4368/F. No. Promotion CT to SCT Karak dated Peshawar the 12/06/2020. ----- (Photocopy of letter No. 4368/F. No. Promotion CT to SCT Karak dated Peshawar the 12/06/2020 is annexed as **Annexure "D"**).
6. That District Education Officer (Male), Karak has not honoured the directions of Director Elementary & Secondary Education Department, Peshawar mentioned under letter dated 12/06/2020 to consider the appellant in the next DPC.
7. That the worthy District Education Officer (Male), Karak failed to honour the directions of the worthy Director Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar, therefore, the petitioner is aggrieved and hence the instant writ petition before this honourable court on the following grounds.



[Handwritten Signature]

Grounds.

- a. That the worthy District Education Officer (Male), Karak was the legal obligation to honour the directions of the worthy Director Elementary & Secondary Education Department, KP, Peshawar.
- b. That in next D.P.C which held on 19/10/2020 the worthy District Education Officer (Male), Karak was bound to first decide the promotion case of petitioner but he did not bother to give response of the directions of worthy Director E & SED KP, Peshawar.

REGISTERED
Peshawar High Court
Bakht Bazaar

- c. That the worthy Director Elementary & Secondary Education Department KP, Peshawar has directed the DEO (M), Karak to consider the petitioner in the next D.P.C but the DEO (M), Karak is reluctant to consider the petitioner . .
- d. That without implementing the directions of the worthy Director E SED KP, Peshawar, the worthy District Education Officer (Male), Karak was no right to proceed the promotion case further.
- e. That due to inaction of the worthy District Education Officer (Male), Karak regarding the case of petitioner for promotion, the petitioner has sustained irreparable loss.
- f. That valuable rights of the petitioner is involved in the instant petition, therefore, the petitioners is constrained to file the instant writ petition before this honourable court.
- g. That any other point will be pressed at the time of argument with permission of this honourable court.

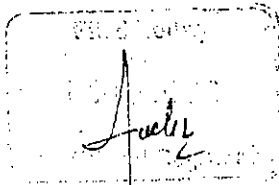
Prayer

So it is, therefore, most humbly and respectfully prayed that on acceptance of the instant writ petition, this honourable court may very graciously be pleased to issue appropriate directions to the worthy District Education Officer (Male), Karak to honour and implement the directions issued by the worthy Director Elementary & Secondary Department KP, Peshawar vide letter No. 4368/F. No. Promotion C.T to SCT Karak Dated Peshawar the 12/06/2020.

Dated:- 14/12/2020.

Petitioner Muhammad Ijaz Khan

**Through Mirzali Khan Khattak
Advocate, (Karak).**



Certificate

Certified that no such like writ petition has been filed earlier on similar ground before this Hon'able court or any other court.

Petitioner Muhammad Ijaz Khan

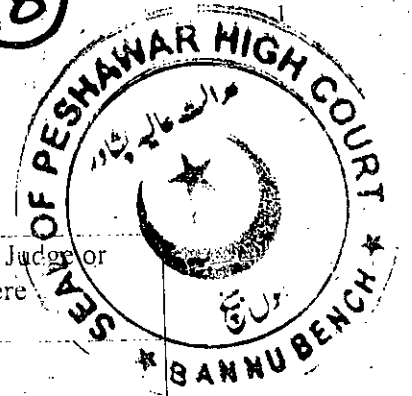
Law Books :-

1. Constitution of Pakistan 1973.
2. Case law according to need.

ATTESTED
 REGISTRAR
 Peshawar High Court
 Peshawar

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FORM "A"
FORM OF ORDER SHEET



Date of order or proceedings	Order or other proceedings with signature of Judge or Magistrate and that of parties or counsel where necessary.
2. 19.01.2021	3. <u>W.P. No. 1268-B/2020.</u> Present: Mir Zali Khan Khattak advocate for petitioner. Mr. Shahid Hamid Qureshi, Addl: A.G for the State. ***** <u>MUSARRAT HILALI, J.</u> -Through the instant constitutional petition, petitioner has prayed for the following relief:- <i>"On acceptance of the instant writ petition, this Hon'ble court may very graciously be pleased to issue appropriate direction to the worthy District Education Officer (Male) Karak to honour and implement the directions issued by the worthy Director Elementary and Secondary Department KP, Peshawar vide letter No. 4368/F No. Promotion C.T to SCT Karak dated Peshawar the 12.6.2020."</i> 2- At the very out-set, learned counsel for petitioner stated at the bar that he would be satisfied, if this petition is disposed of with direction to concerned respondent No-3 for considering the petitioner on

man

Imranullah PS (D.B) Hon'ble Justice Musarrat Hilali and Hon'ble Mr. Justice Sahibzada Asadullah

ATTESTED
EXAMINER
Peshawar High Court
Bannu Bench

19

honouring and implementing the directions issued by the worthy Director Elementary and Secondary Department KP, Peshawar vide letter No. 4368/F No. Promotion C.T to SCT Karak dated Peshawar the 12.6.2020 strictly in accordance with law.

3- Learned Addl: A.G present in court accepts notice in this case and expressed no objection on disposal of the petition as requested by the learned counsel for petitioner.

4- In the light of submission of counsel for petitioner and no objection from Addl: A.G, the instant writ petition is disposed of with direction to respondent No-3 to honour and implement the directions issued by the worthy Director Elementary and Secondary Department KP, Peshawar vide letter No. 4368/F No. Promotion C.T to SCT Karak dated Peshawar the 12.6.2020 strictly in accordance with law.

Announced
19.01.2021.

[Signature]
JUDGE

SCANNED
19 JAN 2021
[Signature]
Khalid Khan

[Signature]
19/01/2021

CERTIFIED TO BE TRUE COPY JUDGE

[Signature]
Examiner

Peshawar High Court Bannu Bench
Appointed Under Article 87 of

the Constitution of Pakistan 1973

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE), KARAK.

OFFICE ORDER

In compliance of the directions of Hon'able Peshawar High Court Bannu Bench, Bannu dated 19/01/2021 passed in Writ Petition No. 1268-B of 2020 titled "**Muhammad Ijaz V.S Govt: of KP etc**" to honour and implement the directions issued by the worthy Director Elementary and Secondary Education Département KP, Peshawar vide letter No. 4368-F No. Promotion CT to SCT Karak dated Peshawar the 12/06/2020 strictly in accordance with law.

Whereas the above mentioned named official claimed promotion S.CT. BPS-16 on the ground of completion of 05 years service on the post of C.T BPS-15 vide appointment order dated 31/05/2014 on adhoc cum contract

Whereas subsequently his services were regularized in BPS- 15 vide Regularization order dated 16/02/2018 from initial appointment Issued by the Elementary & Secondary Education Department KP, Peshawar which was Endorsed by District Education Officer (M), Karak dated 19/03/2018 vide Endst: No. 1610-17/AE-II/CT/Regularization.

Whereas DPC of other category of teaching posts was held on 11/11/2019 except CT BPS-15 to S.CT BPS-16 as there ^{was} no candidate of CT was due for promotion and so far the case of petitioner Muhammad Ijaz is concerned he was not entitled under Section-3 of Khyber Paktunkhwa Employees & Secondary Education Department (Appointment & Regularization of Service) Act, 2017.

Whereas seniority of CT. Teachers were up-dated in the year 2020 in which the above named official mentioned at S. No. 37¹ in seniority list whereas total 42 posts of S.CT were vacant for which DPC was held on 19/10/2020 and 42 C.T were approved to the post of S.CT BPS-16 vide approval order No. 2945-50/File No. 1 /Promotion SCT BPS-16 dated Peshawar the 08/12/2020 issued by the Director E & SED which was endorsed by District Education Officer (Male), Karak vide order No. 4559-63/Promotion /SCT dated Karak the 30/12/2020, therefore, the above named official was not eligible for promotion.

Checked
29/08/2021

In light of the above aforesaid facts, the above named official Mr. Muhammad Ijaz C.T is not entitled for promotion to S.CT BPS-16.

ed
District Education Officer (Male),
Karak.

Endst: No 1317-18

Dated 29.3.21

1. Director Elementary & Secondary Education Department with reference letter No. 4368-F No. Promotion CT to SCT Karak dated Peshawar the 12/06/2020.

2. Mr. Muhammad Ijaz C.T GHS Jandari.

29/3/21
District Education Officer (Male),
Karak.

Office of the District Education Officer Karak
 Ranked seniority List of SCT/CT

Seniority No	Name	Father's Name	BFS	School Where Working	Designation	Subject in BA/BSC/BS	Division in HA	subject in MA	B.Ed/ M.Ed	Date of result Declaration B.Ed	D/O Birth	Date of Ist: Apptt:	Date of T/over Charge in the present post as CT	Date of Declaration CT/ Trained as CT	Date of T/over charge in this Distt:	Date of T/over charge in this Distt: on present post CT	Date of promot: in the present post i/d/ trained teacher	NTS Marks	Remarks
1	Shad Muhammad	Ghulam Qadir Khan	16	GHS Ganderi Khattak	SCT	Eng+Isl edu	3rd	Nil	Nil	27/05/80	1-Jan-61	20-Dec-81	21-Dec-81		21-Dec-81	5-Oct-83	21-Dec-81		
2	Mansoor Mateen	Noor Mateen	16	GHSS Karak	SCT	Eng+Isl edu	2nd	Nil	Nil		10-Apr-61	20-Feb-82	21-Feb-82	14-Oct-80	21-Feb-82	4-Sep-86	21-Feb-82		
3	Hanif Ullah	Gul Faraz Khan	16	GHS khurram	SCT	Eng+Isl Edu	3rd	Nil	Nil		10-Feb-62	4-Apr-83	5-Apr-83		7-Sep-01	7-Sep-01	5-Apr-83		
4	Muhammad Yasin	Jan Mir	16	GHSS Jahangiri	SCT	Eng+Isl edu	3rd	Pashto	B.Ed, M.Ed	5-Mar-94	15-Mar-64	8-Dec-83	10-Dec-83		10-Dec-83	13-Sep-94	10-Dec-83		Promoted to S.CT Forgo
5	Jamil Ur Rehman	Mir Nawaz Khan	16	GHSS Bogara	SCT	Eng+Isl edu	2nd	Islamayat	B.Ed	8-May-94	15-Feb-62	31-Mar-81	7-Mar-84		7-Mar-84	18-Nov-90	7-Mar-84		
6	Fayyaz Ahmad	Said Ghulam	16	GHS Ganderi Khattak	SCT	Eng+Isl edu	2nd	Nil	DAE		13-Jan-64	23-Oct-84	30-Oct-84		16-Feb-91	16-Feb-91	30-Oct-84		
7											16-Dec-61								
8											23-Aug-63								
9	Muhammad Ali Khan	Habib Ullah Jan	15	GHS Manzini	SCT	Eng+Isl edu	2nd	Nil	Nil	17/3/94	3-Mar-64	21-Sep-86	21-Sep-86		21-Sep-86	21-Sep-86	21-Sep-86		
10	Zafar Rehman	M Ahmad Khan	16	GHS Gurang Siraj Khel	SCT	Eng+Isl Edu	2nd	Nil	Nil	26/5/87	1-May-62	21-Nov-81	23-Nov-81	26-May-87	26-May-87	3-Dec-88	27-May-87		
11	Rauf Khan	Muhammad Ghani	16	GHSS Jahangiri	SCT	Eng+Isl Edu	2nd	Nil	Nil		1-Feb-61	7-Nov-84	18-Nov-84	12-Sep-87	12-Sep-87	30-Nov-89	12-Sep-87		
12	Sadiq Nawaz	Shahwaz Khan	16	GHS Town Committee	SCT	Eng+Isl Edu	3rd	Nil	Nil		10-Oct-64	12-Sep-87	14-Sep-87	2-Sep-87	14-Sep-87	17-Dec-89	14-Sep-87		
13	Mir Pio Khan	Gul Said Khan	16	GHS Bangi Killa	SCT	Eng+Isl edu	2nd	Nil	Nil		9-Sep-62	8-Mar-82	20-Sep-87		20-Sep-87	16-Dec-89	20-Sep-87		
14											22-Dec-62								
15	Shamshad Ali	Muhammad Zar Ali	16	GHS Takht e Nasruti	SCT	Eng+Isl edu	2nd	Pashto	B.Ed	12-Aug-02	4-Apr-65	19-Sep-87	20-Sep-87	13-Aug-87	20-Sep-87	19 Feb-92	20-Sep-87		
16	Mukhtiar Ali	Mir Ghazi Khan	16	GHSS Bogara	SCT	Eng+Isl edu	2nd	Nil	Nil		15-Jan-67	19-Sep-87	20-Sep-87		20-Sep-87	20-Sep-87	20-Sep-87		
17	Khalid Rehman	Awal Khan	16	GHSS Karak	SCT	Eng+Isl edu	3rd	Nil	Nil		4-Feb-64	19-Sep-87	22-Sep-87	13-Aug-87	22-Sep-87	22-Sep-87	22-Sep-87		
18	Iftikhar ul Mulk	Munawar Jan	16	GHS Bangi Killa	SCT	Eng+Isl edu	3rd	Nil	Nil	6-May-96	15-Apr-62	20-Oct-87	21-Oct-87		21-Oct-87	27-Apr-88	21-Oct-87		
19	Saleh Ullah	Abdul Hamid Khan	16	GHS Surati Killa	SCT	Eng+Isl edu	2nd	Nil	Nil		15-Apr-62	5-Oct-80	12-Oct-80	29-Nov-87	12-Nov-90	13-Nov-90	29-Nov-87		
20											3-Feb-63								
21	Riayat Khan	Saitani	16	GCMHS Chokara	SCT	Eng+Isl Edu	2nd	English	B.Ed	5-Oct-93	23-Oct-63	8-Dec-82	9-Dec-82	29-Nov-87	29-Nov-87	2-Sep-03	29-Nov-87		BA 3rd and second BA from al-Khair
22	Muhammad Maqsood	Jumaraz Khan	16	GHSS Karak	SCT	Eng+Isl Edu	BA 3rd	Pashto,Urdu	B.Ed, M.Ed	6-May-96	19-Dec-63	28-Nov-83	1-Dec-83	29-Nov-87	29-Nov-87	3-Nov-86	29-Nov-87		
23	Mumtaz Khan	Maisal Khan	16	GHS Takht e Nasruti	SCT	Eng+Isl edu	3rd	Nil	Nil		2-Apr-61	2-May-84	3-May-84	1-Aug-88	1-Aug-88	3-Dec-88	1-Aug-88		
24	Muhammad Raziq	Mehtar Suliman	16	GHS Rehamat Abad	SCT	Eng+Isl edu	3rd	Pol: Sci, Islamayat	M.Ed	29-Oct-98	1-May-63	2-Nov-86	4-Nov-86	17-Sep-88	17-Sep-88	23-Aug-89	17-Sep-88		
25	Akhtar Zahid	Raibat Khan	16	GHS Ahmad Abad	SCT	Eng+ Isl Edu	2nd	Nil	B.Ed, M.Ed	29-Apr-93	20-Mar-64	26-Jan-84	26-Jan-84	31-Jan-89	31-Jan-89	21-Aug-89	31-Jan-89		BA Al-Khair
26	Kamal ur Rehman	Khan Mir	16	GHS Gurguri	SCT	Eng+ Statisitc	2nd	Pashto	B.Ed	27-Oct-92	1-Jan-66	22-Oct-89	25-Oct-89	1-Oct-88	25-Oct-89	1-Oct-88	25-Oct-89		Correction made in BA Division

Seniority	Name	Teacher's Name	BPS	School Where Working	Designation	Subject in BA/BSC/BS	Division in BA	Subject in MA	B.Ed./M.Ed	Date of result Declaration B.Ed	D/O Birth	Date of Ist: Apptt:	Date of T/over Charge in the present post as CT	Date of Declaration CT/Trained as CT	Date of T/over charge in this Distt:	Date of T/over charge in this Distt: on present post CT	Date of promot: in the present post i/e/ trained teacher	NTS Marks	Remarks
356	Zafar Ali Khan	Daud Khan	15	GHS Garang Siraj Khel	CT	Engl+Econ	2nd	Economics	B.Ed, M.ed		15-Sep-81	9-Mar-06	25-Sep-17			25-Sep-17	25-Sep-17		
357	Sajid Tahseen Ahmad	Muhammad Riaz	15	GHS Darosh Khel	CT	Phy+Maths	2nd	Maths	B.Ed, M.Ed		1-Nov-84	9-Mar-06	21-Sep-17				21-Sep-17		
358	Mohib Ullah	Gul Faraz Khan	15	GMS Ahmad Khel	CT	Engl+Urdu	2nd	Pashto	B.Ed		10-Apr-85	9-Mar-06	21-Sep-17				21-Sep-17		
359	Javid Iqbal	Awal Muhammad	15	GHS Ghundi Killa	CT	Engl+Isl Edu	2nd	Islamayat	B.Ed		12-May-73	24-Jul-06	23-Sep-17			23-Sep-17	23-Sep-17		
360	Aziz Ur Rahman	Amir Sabir Rahman	15	GMS Wanki siraj Khel	CT	B.com	2nd	M.Com	Nil		1-Jan-75	25-Jul-06	22-Sep-17				22-Sep-17		
361	Adil Zaman	Sattar Jan	15	GMS Zebi Charu Khel	CT	Engl+Isl Edu	2nd	Nil	B.Ed		1-Apr-84	31-Jul-06	22-Sep-17				22-Sep-17		
362	Falak Naz	Janat Amin	15	GMS Jarasi	CT	Engl+Isl Edu	2nd	Nil	B.Ed		1-Jan-79	24-Jul-06	22-Sep-17				22-Sep-17		
363	Ibrar Khan	Munawar shah	15	GHS Surdok	CT	Engl+Isl Edu	2nd	Urdu	B.Ed		3-Feb-80	24-Jul-06	21-Sep-17				21-Sep-17		
364	Muhammad Jamal	Imam Saddique	15	GMS Jattan Banda	CT	Engl+Isl Edu	2nd		B.Ed		1-Aug-82	25-Jul-06	21-Sep-17				21-Sep-17		
365	Javid Iqbal	Mir Pio Khan	15	GMS Yaqoobi Killa	CT	Eng+Isl Edu	2nd	English	B.Ed		1-Feb-73	24-Jul-06	23-Sep-17			23-Sep-17	23-Sep-17		
366	Shahid Iqbal	Laiq-Ur-Rehman	15	GHS Dagar Nari	CT	Engl+Isl Edu	2nd	Islamayat, Arabic	B.Ed		31-Dec-80	24-Jul-06	21-Sep-17				21-Sep-17		
367	Siraj Ullah	Hajat Khan	15	GHS Dagar Nari	CT	Engl+Isl Edu	2nd	Pak. Study, Pol.Sc	B.Ed, M.Ed		10-Sep-83	24-Jul-06	21-Sep-17				21-Sep-17		
368	Mohsin Ali Khan	Abdul Manan	15	GHS Sabir Abad	CT	Engl+Isl Edu	2nd	Pol.Sc	B.Ed		12-May-79	31-Jul-06	21-Sep-17				21-Sep-17		
369											4-Oct-79								
370	Muhammad Ikhtiar	Pir Bad Shah	15	GMS Sarat Khel	CT	Engl+Isl Edu	2nd	Islamayat	B.Ed		13-Mar-80	31-Jul-06	22-Sep-17				22-Sep-17		
371	Azduallah	Abat Khan	15	GHS Paloski	CT	Engl+Isl Edu	2nd	Islamayat	Nil		15-Dec-74	24-Jul-06	21-Sep-17			21-Sep-17	21-Sep-17		
372	Muhammad Hashim	Muhammad Khan	15	GMS W.M. Hassan Khel	CT	Engl+Isl Edu	2nd		B.Ed		6-Apr-76	31-Jul-06	21-Sep-17				21-Sep-17		
373											20-Jan-77								
374	Asghar Ali Khan	Darood Akber	15	GMS Sabir Abad	CT	Engl+Isl Edu	2nd	Islamayat	B.Ed, M.Ed		2-Jan-79	31-Jul-06	23-Sep-17				23-Sep-17		B.Ed, M.Ed Al-Khair
375	Noor Muhammad Khan	Imam Gul	15	GHS Sabir Abad	CT	Engl+Isl Edu	2nd	Islamayat	B.Ed		10-Apr-81	31-Jul-06	21-Sep-17				21-Sep-17		
376	Sadiq Menhas	Zulja Mir	15	GMS Ashkari Ali khel	CT	Eng+ Isl Edu	2nd	Urdu	Nil		13-Apr-84	24-Jul-06	22-Sep-17				22-Sep-17		

377	Muhammad Ijaz Khan	Noor Janan	15	GHS Ghunda Shamshaki	CT	Engl+Isl Edu	1st	Islamayat	Nil		7-Aug-89	31-May-14	31-May-14				31-May-14	130.94	
378	Muhammad Zahoor	Khan Wali Khan	15	GHSS Chanda Khurram	CT	Engl+Isl Edu	1st	English	B.Ed		1-Mar-87	14-Mar-15	17-Mar-15				17-Mar-15	132.15	
379	Muhammad Shogib Anwar	Muhammad Anwar	15	GHSS Chanda Khurram	CT	Phy+Maths	2nd	Physics, M.Phil	B.Ed		16-Jun-85	14-Mar-15	17-Mar-15				17-Mar-15	131.44	
380	Waqeem Ullah	Abdul Ghani Khan	15	GHS Jatta Ismail Khel	CT	BS Elect Eng	1st	BS Elect Eng	Nil		30-May-91	14-Mar-15	14-Mar-15				8-Oct-15	129.05	
381	Muhammad Tayyab	Ali Jan	15	GHS Tarki Khel	CT	Phy+Maths	1st	Physics	Nil		10-Apr-88	14-Mar-15	19-Mar-15				19-Mar-15	128.13	

DEO M Bannu

Promotion of Senior Teachers of District Bannu

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DIRECTORATE OF ELEMENTARY AND SECONDARY
EDUCATION KHYBER PAKHTUN KHAWA PESHAWAR.

Annexure J

Notification

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.SO(B&A)/1-18/E&SE/2012 dated 11.7.2012 and Finance Department Endorsement No.SO(FR)/FD/ 10-22(E)2010 dated 16.7.2012, the following CT (Male) are promoted to the posts of Senior CT in BPS-16 (Rs.18910-1520-64510), plus usual allowances as admissible under the rule on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect, and further they will be adjusted by the District Education Officer concerned.

ITEM No.1 PROMOTION OF CT (BPS-15) MALE TO THE POST OF SCT (BPS-16) ON REGULAR BASIS

Total No. of Sanctioned Post of CT	824
1/3 Share of SCT Posts	275
Share of Promotion Quota of SCT	100%
Already Promoted to SCT	212
Posts Available for Promotion to SCT	63
Proposed CT for Promotion to SCT	47

The Court Stay is vacated in Civil Appeal No.12/1, dated 30.11.2019/ 8.1.2020 in the Court of Civil Judge No.VI, Bannu & in Civil Appeal No.132/1, dated 8.11.2019 in the Court of Civil Judge No.VI, Bannu, and with decisions dates as Order No.5, 27.2.2020 and Order No.12, 27.2.2020 respectively.

Sl#	Sn #	Name of Official	Name of School	Date of Birth	Date of Apptt: as Regular CT	Qual:	Remarks
1	520	Sajadullah Khan	GHS Hakim Bharat	14.9.1981	16.5.2014	MBA, IT, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
2	522	Khair Ullah Khan	GMS Zaman Wazir	10.4.1988	16.5.2014	MA, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
3	524	Irshad Ahmad Shah	GHS Khujari Baber	17.4.1987	16.5.2014	MSc, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
4	525	Shah Qiaz Khan	GMS Umer Khan Mama Khel	20.3.1987	16.5.2014	MSc, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
5	526	Zewran Ullah Khan	GMS Piran, Doud Shah	12.9.1986	16.5.2014	M.Phil M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect

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Promotion of Senior Teachers of District Bannu

6	528	Qasim Khan	GMS Dilnawaz Dad Kachkot	18.4.1989	16.5.2014	M.Com M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
7	530	Rafi Ullah	GHS No.3 Bannu City	5.9.1978	16.5.2014	MSc, M.Ed, PhD	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
8	533	Zia-ul-Haq	GHS No.2 Bannu City	27.3.1980	16.5.2014	Phd, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
9	534	Noor Zali Khan	GMS Tarket Zegar Mama Khel	14.3.1985	16.5.2014	MA, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
10	535	Ansar Ullah Khan	GMS Sabu Khel Guli Kala	8.10.1985	16.5.2014	MS, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
11	536	Asif Mehmood	GMS Allah Dad Mamash Khel	22.4.1978	16.5.2014	MPA, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
12	537	Gul Andaz Khan	GMS Hassan Khel Kheraki	3.3.1988	16.5.2014	MSc, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
13	538	Farman Ullah Khan	GMS Shaheed Baba	30.8.1984	16.5.2014	M.Phil, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
14	539	Wahid Ullah Khan	GMS No.2 Bannu	30.3.1979	16.5.2014	MA, B.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
15	540	Shah Payaz Khan	GHS Adnan Sardi Khel	5.2.1987	16.5.2014	MA, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
16	541	Farooq Shah	GHS Domanza Bizan Khel	6.4.1985	16.5.2014	MA, B.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
17	542	Rehman Ullah Khan	GHSS Ismail Khel		16.5.2014	Phd, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
18	543	Farhan Shah	GMS Piran Doud Shah	22.9.1982	16.5.2014	MA, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
19	544	Muhibtur-Rehman	GMS Hassani Darah-Shah	20.4.1987	16.5.2014	MSc, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect

Promotion of Senior Teachers of District Bannu

20	545	Muhammad Shoaib Anjum	GMS Alimat Khotakan	25.3.1988	16.5.2014	MSc, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16 on regular basis with immediate effect
21	546	Asim Khan	GMS Muhammad Khan Kakki	10.7.1987	16.5.2014	MA	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16 on regular basis with immediate effect
22	547	Khurshid Nawaz	GHS Khujari Bazar	21.2.1984	16.5.2014	MA, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
23	548	Shah Zeb Ullah	GHS Dilasa Khan Mandw	15.4.1988	16.5.2014	BSSE, Hon, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
24	549	Hidayat Ullah	GHS Khdry Muhammad Khel	1.3.1986	16.5.2014	MSc, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
25	550	Harool Khan	GHSS Comp Bannu	5.9.1983	16.5.2014	MA, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16 on regular basis with immediate effect
26	551	Ihsan Ullah	GMS Guli Killa Sabo khel	5.2.1984	16.5.2014	MSc, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
27	552	Gul Faza Khan	GMS Adami Rasool Khan	3.1.1988	16.5.2014	MSc, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
28	553	Bakhtiar Ali Khan	GMS Inam Tughal Khel	12.4.1982	16.5.2014	MA, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
29	554	Farman Ullah Khan	GMS Ghamber Bannu	25.3.1986	16.5.2014	MBA, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
30	555	Kamran Khan	GMS Kachozai Bannu	1.3.1982	16.5.2014	M:Phll, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
31	556	Gul Zali Khan	GHSS Comp Bannu	3.1.1982	16.5.2014	MSc, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
32	557	Shahid Ali Shah	GMS Behram 6.Gari Mamash Khel	13.4.1983	16.5.2014	MSc, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
33	558	Muhammad Imran Ali Shah	GMS Asad Khujari	25.10.1980	16.5.2014	MA, M.Phil, Edu	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect

Promotion of Senior Teachers of District Bannu

34	559	Imran Khan	GMS Gul Jawar Domel	10.8.1984	16.5.2014	MBA, B.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
35	560	Ali Rehman Khan	GMS Hassan Khel Kheraki	5.4.1986	16.5.2014	MSc, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
36	561	Muhammad Ayaz	GHS Murib Khel Baka Khel	15.3.1985	16.5.2014	MSc, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
37	562	Muhammad Nasir	GMS Kausar Fatah Khel	15.1.1987	16.5.2014	MSc, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
38	563	Kher Muhammad	GMS Khuwajamad Landidak	3.3.1989	16.5.2014	MSc, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
39	564	Ibrar Ullah Khan	Ghs Dogar Umerzai	15.1.1990	16.5.2014	MSc, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
40	565	Asghar Ali Khan	GMS Nurur Khas	16.2.1984	16.5.2014	MA, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
41	566	Sher Ullah	GHSS Painsda Khel	19.9.1988	16.5.2014	MA, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
42	567	Shakil Nawz Khan	GMS Kabir Khurgal Domel	4.3.1982	16.5.2014	MA, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
43	568	Zakir Ullah Khan	GMS Ribat Khan Bharat	13.4.1988	16.5.2014	MA, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
44	569	Shahi Kamran	GHS No.2 Bannu	4.9.1988	16.5.2014	MA, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
45	570	Nasrullah Khan	GMS Mirzali Gul Badin Lanidak	25.10.1988	16.5.2014	MA, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
46	571	Maqsood Khan	GMS Bazida Yousaf Khan	20.9.1981	16.5.2014	MA, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect
47	572	Ghulam Rehman	GCMS For Boys Bannu	27.7.1983	16.5.2014	M.Phil, M.Ed	Services are placed at the disposal of DEO (M)Bannu for further adjustment against the post of SCT in BPS-16, on regular basis with immediate effect

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8(27)

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE),

No. 155 **KARAK** Dated 12-1-22

AUTHORITY LETTER

IN

Service Appeal No. 4968 of 2021

Muhammad Ijaz (Appellant)

VERSUS

Education Department KPK & Others (Respondents)

Mr. Muhammad Rafiq ADEO(Sports) BPS-16 in DEO(M) Karak do hereby authorized to file written comments on behalf of official respondents in the above service appeal in the KPK Service Tribunal Peshawar.

Dated: 12/01/2022

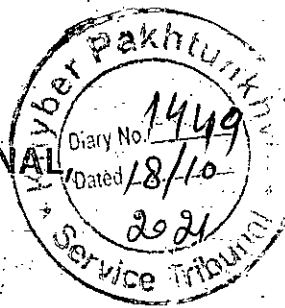


DISTRICT EDUCATION OFFICER
(MALE) KARAK



District Education Officer
Karak

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR



SERVICE APPEAL NO. 4968 /20 21

M. Ijaz Khan

V/S

Education Deptt

**APPLICATION FOR THE GRANT OF PERMISSION TO DEPOSIT
SECURITY PROCESS FEE**

Respected Sir,

1. That the above titled appeal is pending adjudication before this Honourable tribunal which is fixed for hearing on 31.1.2022
2. That the case was fixed for preliminary hearing on 22.9.21 and admitted for regular hearing subject to deposit of security process fee.
3. That due to unavoidable circumstance the security process was not deposited within the stipulated time.
4. That there is no legal bar if permission is granted for depositing the security process fee.

Advised

It is therefore, most humbly prayed that permission may kindly be granted to deposit security process fee.

Put up to the worthy chair-man with relevant app. p.

APPELLANT

Through:

[Signature]
NOOR MOHAMMAD KHATTAK,
Advocate High Court, Peshawar

Raghu

[Signature]
18/10/2021

(3-A)

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR.

Service appeal No. 4968 of 2021

Muhammad Ijaz (Appellant)

VERSUS


Govt: of KPK & etc (Respondents)

AFFIDAVIT

I, Muhammad Rafiq ADEO(Sports) BPS-16 in DEO (M), Karak do hereby solemnly affirm and declare on oath that all the contents of accompanying joint parawise comments are true and correct to the best of my knowledge and belief, nothing is lie and nothing has been concealed from this Hon'able Service Tribunal

Dated --11--/01/2022

Deponent

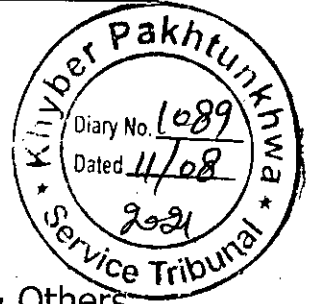

11/01/2022
Muhammad Rafiq
BPS-16

PH 22/09
**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.**

C.M NO. _____ / 2021

IN

APPEAL No. _____ / 2021



MUHAMMAD IJAZ KHAN VS Gvot. Of KP & Others

Put up to the worthy chain-of with relevant appeal.
11/8/21
Reader
**APPLICATION FOR EARLY HEARING OF THE ABOVE TITLE
APPEAL.**

R/SHEWETH:

The applicant submits as under:

Fix in 2nd week of August, 2021.
13/8/2021
That the captioned service appeal is pending adjudication before this Hon'ble tribunal, in which 22-09-2021 is fixed for hearing.

That appellant has filed the above mentioned service appeal by impugning order dated 08-12-2020 whereby junior to the appellant have been promoted. That the respondents have now again convene another DPC for 12-08-2021 vide letter dated 29-07-2021. Copy of the letter dated 29-07-2021 is attached as annexureA.

- 3- That as valuable rights of the applicant are attached to the instant appeal, therefore it is essential that the mentioned appeal be fixed as early as possible.
- 4- That the respondents have called another DPC for the mentioned date and the appellant has the apprehension that the respondents may again ignore the appellant.
- 5- That if the above appeal are not fixed at early date then it would become anfractuious.

It is therefore most humbly prayed that on acceptance of this application the mentioned appeal may be requisition for early hearing.

APPLICANT

MUHAMMAD IJAZ KHAN

THROUGH:

**NOOR MUHAMMAD KHATTAK
ADVOCATE**



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

No. 174-200/490/Vol-IV/SST(M) Complaints Karak
Dated 29/07/2021

To:

All District Education Officers (M),
Khyber Pakhtunkhwa.

Subject:-

MEETING OF DEPARTMENTAL PROMOTION COMMITTEE FOR PROMOTION
TO SENIOR TEACHERS (PS-16) AND SST (G), SST (B/C) AND SST (P/M) BPS-16

Memor:-

I am directed to refer to the subject cited above and to say that the meeting of Departmental Promotion Committee has been scheduled to be held on 12-08-2021 sharply at 10:00 am this Directorate, for Promotion of CT, DM, AT, IT and PET to SCT, SDM, SAT, STT and SPET, and SCT, SDM, SAT, STT and S.Qari to SST (G), SST (B/C) and SST (P/M) BPS-16 respectively, against the vacant posts available under the Promotion Quota at different districts.

I am further directed to ask you to attend the subject meeting as per the schedule, instructions and certificate attached herewith for your kind, assent, and to submit the subject promotion cases, if fulfilling the academic and professional qualifications and having the required service length for promotion, by 12-08-2021 as per the date of Departmental Promotion Committee-meeting, in quality personal files of each teacher, having the following items, along-with updated seniority list and working papers please.

1. CNIC
2. Bio-Data
3. Synopsis
4. ACRs for the Last Five Years
5. Last Three Years' Results
6. All Academic & Professional Documents
7. Domiciles
8. Last Pay Rolls
9. First Appointment Order
10. Promotion Orders (If any)
11. Non-Involvement Certificate
12. Service Certificate
13. Original Service Books (Updated and complete in all sorts of entries like academic and professional qualifications with documentary proofs of NOCs/Ex-Post Facto Sanctions, and service verification
14. Certificated that the seniority list of each cadre updated and no apples is pending

Note:- All documents must be attested by Reporting Officer and Countersigning Officer. General guidelines and specimen of working papers is attached for ready reference.

Deputy Director (Estab.)
Khyber Pakhtunkhwa
Peshawar

Encls No

Copy forwarded to the:-

1. Additional Director Establishment (Male/Female) E&SE Peshawar
2. Additional Director Establishment, Newly Merged Districts.
3. P.A to Director Elementary & Secondary Education Khyber Pakhtunkhwa
4. Master File.

Deputy Director (Estab.)
Khyber Pakhtunkhwa