


17th March, 2023

Counsel for the appellant present. Mr. Asad Ali Khan, Assistant Advocate General alongwith Noor Badshah, ADEO (Litigation) for the respondents present.

Reply/comments on behalf of the respondents submitted, which is placed on file and a copy whereof handed over to learned counsel for the appellant. Cost of Rs. 2000/- handed over by the said representative to learned counsel for the appellant on proper receipt. To come up for rejoinder, if any and arguments on 31.05.2023 before the D.B. Parcha Peshi given to the parties.

SCANNED
KF ST
Peshawar


(Fareeha Paul)
Member(E)

20.12.2022

Appellant present in person. Muhammad Adeel Butt learned Additional Advocate General alongwith Noor Badshah Litigation Officer for respondents present.

SCANNED
KPST
Peshawar

Reply not submitted. Learned AAG sought time for submission of written reply. Last chance is given. To come up for written reply/comments on 03.02.2023 before S.B.



(Rozina Rehman)
Member (J)

03.02.2023

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

SCANNED
KPST
Peshawar

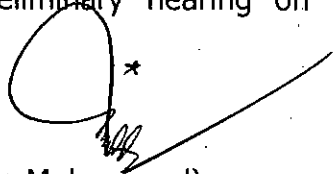
Written reply not submitted. Learned AAG requested for time to submit written reply. Last opportunity is extended on payment of cost of Rs. 2000/-. To come up for written reply/preliminary hearing on 17.03.2023 before S.B.



(Rozina Rehman)
Member (J)

02.09.2022

Clerk of learned counsel for the appellant present and requested for adjournment on the ground as senior counsel for the appellant is not available today. Adjourned. To come up for preliminary hearing on 17.10.2022.

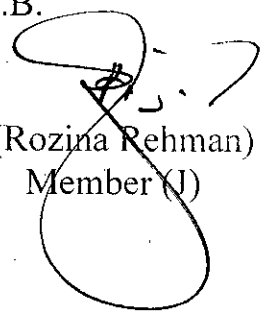

(Mian Muhammad)
Member (E)

17.10.2022

Appellant alongwith his counsel present.

Preliminary arguments heard and record perused.

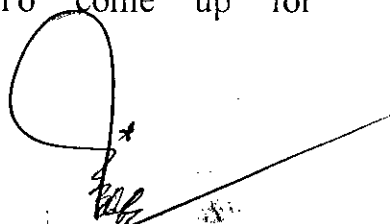
Points raised need consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of reply/comments. To come up for reply/comments on 18.11.2022 before S.B.


(Rozina Rehman)
Member (J)

18.11.2022

Appellant in person present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Reply/comments on behalf of respondents not submitted. Learned Additional Advocate General seeks time to contact the respondents for submission of reply/comments. Adjourned. To come up for reply/comments on 20.12.2022 before S.B.


(Mian Muhammad)
Member (E)

Rs. 100/-
Deposited
Security & Process Fee
A. J. / 11/11/22


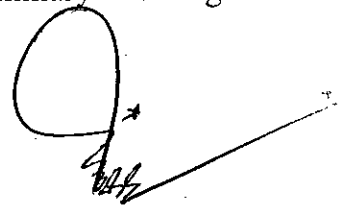
SCANNED
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Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 1112 /2022 _____

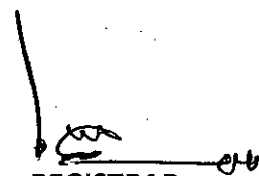
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	14/07/2022	<p>The appeal of Mr. Faris Khan resubmitted today by Mr. Bismillah Jan Wazir Advocate. It is fixed for preliminary hearing before the Single Bench for 15.07.2022. Percha peshi is given to the appellant/counsel.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>
2-	15.07.2022	<p>Mr. Muhammad Ilyas Khan, Advocate present and submitted Waklatnama in favour of the appellant which is placed on file.</p> <p>Learned counsel for the appellant requested for adjournment in order to further prepare the brief. Adjourned. To come up for preliminary hearing on 02.09.2022 before S.B.</p> <p> (MIAN MUHAMMAD) MEMBER (E)</p>

The appeal of Mr. Faris Khan serving as TT GPS Baz Muhammad District Mohmand received today i.e. on 13.07.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

Annexure-F of the appeal is illegible which may be replaced by legible/better one.

No. 2202 /S.T,

Dt. 13/7 /2022


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Bismillah Jan Wazir
Adv. High Court Peshawar.

Resubmitted and better copy
has been attached herewith
Bis

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

Service Appeal No 1112 /2022

Faris Khan.....Appellant

VERSUS

The Secretary (E&SE) & others Respondents

I N D E X

S NO	DESCRIPTION OF DOCUMENTS	ANNEX	PAGES
1.	Service Appeal	-	1-6
2.	Affidavit	-	7
3.	Copy of the Merit List and Appointment order dated 15.01.2016	A	8-13
4.	Copy of the Seniority list	B	14-
5.	Copy of the order dated 03.12.2021	"C"	15-17
6.	Copies of the Relevant record	"D"	18-21
7.	Copies of the Applications and recommendations of the competent authority	"E"	22-30
8.	Copy of the Departmental Appeal	F	31
9.	Wakalat Nama		32

Through: Appellant

Bis W
(BISMILLAH JAN WAZIR)

& *Bashir*
(BASHIR KHAN WAZIR)

Advocate,
High Court, Peshawar

Dated:- 13.07.2022

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BEFORE THE HONORABLE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA PESHAWAR

Service Appeal No 1112 /2022

Faris Khan Serving as TT GPS Baz Muhammad District
Mohmand

.....Appellant

VERSUS

1. The Secretary (E&SE) Department Khyber Pakhtunkhwa,
Peshawar
2. The Director (E&SE) Department Khyber Pakhtunkhwa,
Peshawar
3. District Education Officer (Male) District Mohmand.

.....Respondents

SERVICE APPEAL UNDER SECTION 4 OF KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974,
WHEREBY THE APPELLANT WAS DEPRIVED FROM
PROMOTION INSPITE OF THE FACT THAT THE
APPELLANT WAS QUITE ELIGIBLE FOR PROMOTION
W.E.F 03.12.2021 FOR THE POST OF SENIOR
THEOLOGY TEACHER BPS-16, HOWEVER THE NAME
OF THE APPELLANT WAS NOT CONSIDERED FOR
PROMOTION, INSPITE OF THE FACT THAT THE
COMPETENT AUTHORITY FORWARDED THE REQUEST
FOR PROMOTION OF THE APPELLANT.

Prayer in Appeal:

On acceptance of the instant Appeal, the Appellant
being eligible and entitled for the post of Senior Theology

2/

Teacher (STT) BPS-16 w.e.f 03.12.2021 as per Seniority list, but the Respondents violated the Seniority of the Appellant, therefore, the Respondents may very kindly be directed to promote the Appellant w.e.f 03.12.2021.

Respectfully Sheweth:-

The Appellant humbly submits as under:-

1. That the Appellant is peaceful and law abiding citizen of Pakistan and is entitled for all the rights guaranteed by the Constitution of Islamic Republic of Pakistan, 1973.
2. That the Appellant was appointed as Theology Teacher on 15.01.2016 after the completion of all codal formalities, the merit list was prepared according to the Merit position and thereafter the Appointment order of the Appellant was issued. **(Copy of the Merit List and Appointment order dated 15.01.2016 are attached as annexure A).**
3. That the Appellant assumed the charge of post of TT BPS-15 and was performing his duties with great zeal and zest and to the entire satisfaction of his high ups.
4. That the Respondent No 2 placed the seniority list for promotion of the Theology Teachers (TT) BPS-15 with recommendation of being promotion to the post of STT BPS-16, in which the name of the Appellant was placed at serial No 9 and after conducting of DPC the name of the Appellant was even not consider for promotion, inspite of the fact that there were 8 vacant positions of the post of STT BPS-16, however only 5 candidates had been recommended for promotion. **(Copy of the Seniority list is attached as annexure B).**

5. That consequent upon the recommendation of the Departmental Promotion Committee, the competent Authority while issued the impugned order dated 03.12.2021 whereby combined promotion to the next higher post of the candidates have been issued. **(Copy of the order dated 03.12.2021 is attached as annexure C)**

6. That the Appellant, while pointed out the Irregularities and illegalities in the promotion list to the competent authority and one Rooh Ullah which is placed at Serial No 6 in the list was terminated and inspite of his termination order provided to the competent authority his name was placed before the DPC and the Appellant when pointed out the name and termination order of the said Rooh Ullah even then they have been ignored the request of the Appellant and placed the name of said candidate and if his subject name was not placed before the DPC the Appellant would have been considered and promoted to the post of STT BPS-16. **(Copies of the Relevant record are attached as annexure D)**

7. That the Appellant repeatedly submitted his requests to the Respondents for promotion w.e.f 03.12.2021 from which his colleagues have been promoted which were endorsed by the Respondents and forwarded further for recommendation and even it was pointed out to the competent authority that the Appellant was eligible to be promoted on the post of STT BPS-16 w.e.f 03.12.2021. **(Copies of the Applications and recommendations of the competent authority are attached as annexure E)**

- 4
8. That the Respondents inspite of realizing the eligibility and entitlement of the Appellant for promotion to the post of STT BPS-16 and having recommendation for further promotion, even then the Appellant was ignored and thereafter the Appellant submitted Departmental Appeal on dated 08.03.2022 to the Respondent No 1 which has been endorsed, but till date no order of promotion has been issued. **(Copy of the Departmental Appeal is attached as annexure F)**
 9. That on the complaint of Appellant inquiry committee was constituted to probe into the matter.
 10. That after conducting proper inquiry the inquiry committee recommended the Appellant to be promoted for the post of STT, however, till date the Appellant was not promoted and on 03.12.2021 STT Teachers was promoted from TT to STT.
 11. That the Respondent No 2 also recommended the Appellant to be promoted from TT to STT but till yet no promotion order has been issued in favour of the Appellant.
 12. That feeling aggrieved from the act of Respondents, the Appellant having no other adequate and efficacious remedy, approaches this Honourable Tribunal on the following grounds inter-alia:-

GROUND:-

- A) That the Appellant is peaceful and law abiding citizen of Islamic Republic of Pakistan and is fully entitled to all
-

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the basic and fundamental rights as enshrined in the fundamental law of the state, interpreted and guaranteed by the law of the land.

- B) That the acts of the Respondents of not following the same criteria which has been safeguarded by the law and rules, while in the instant case the respondents have not yet been considered the case of the Appellant, which is illegal, unlawful, unnatural, ab-initio, null and void in the eye of law, hence liable to be declared so.
- C) That it is pertinent to mention here that the Appellant was eligible and entitled for promotion on the date, whereby his other colleagues have been placed before the DPC and were promoted, however the name of the Appellant was mentioned at Serial No 9, after the exclusion of Terminated Employee, he was quite eligible to be consider for promotion to the post of STT BPS-16 but due to the wrong and terminated candidate was mentioned at Serial No 6, the name of the Appellant was even not considered by the DPC for promotion, therefore the Appellant was treated malafidely and violated his fundamental rights.
- D) That the fundamental rights of the Appellant has blatantly violated by the Respondents and the Appellant has been discriminated and has been denied his due rights under the Constitution of Islamic Republic of Pakistan, 1973.
- E) That the Appellant is not treated in accordance with law, rules and Regulations.
- F) That the Appellant is appointed according to rules and on adopted procedure by the respondents and after his appointments he has never ever given an opportunity of any complaint to the respondents and performed his duties with full devotions, the Appellant being eligible



for Promotion being most Senior employee of the Respondents Department serving in the Respondents Department since 2016.

- G) That the Applications and Appeal of the Appellant was properly examined along with record and reach to the conclusion, the right of promotion of the Appellant has been realized and recommended for promotion but till date the Respondents are even not implementing their commitments which is against the rules, law and regulations. •
- H) That any other ground not raised here specifically may graciously be allowed to be raised at the time of arguments.

PRAYER:-

It is, therefore, most humbly prayed that, On acceptance of the instant Appeal, the Appellant being eligible and entitled for the post of Senior Theology Teacher (STT) BPS-16 w.e.f 03.12.2021 as per Seniority list, but the Respondents violated the Seniority of the Appellant, therefore, the Respondents may very kindly be directed to promote the Appellant w.e.f 03.12.2021.

Any other relief, not specifically asked for may also graciously be extended in favour of the Appellant in the circumstances of the case.

Appellant
 Through: 
 (BISMILLAH JAN WAZIR)
 & 
 (BASHIR KHAN WAZIR)
 Advocate,
 High Court, Peshawar

Dated:- 13.07.2022

CERTIFICATE:

It is certified that no such like Appeal has earlier been filed before this Hon'ble Tribunal.


 DEPONENT

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

Service Appeal No. _____/2022

Faris KhanAppellant

Vs

Government of Khyber Pakhtunkhwa & others
.....Respondents

AFFIDAVIT

I, **Faris Khan** S/o Shan Badhsah R/o Post Office Yakaghund Tehsil Pindyali District Mohmand, do hereby solemnly affirm and declare on oath that the contents of the **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

Faris
DEPONENT

A2 8

REVIEWED/VERIFIED OPEN MERIT LIST OF TT (MALE) CANDIDATES OF MOHMAND AGENCY FOR FREH APPOINTMENT (RE-INTERVIEWED BY THE ENQUIRY COMMITTEE W.E.F 1/12/2015 TO 22/12/2015)

S.No	Name	FName	Tenar	DOB	SSC	Scor	PA	MC	PA	MC	PA	MC	PA	MC	PA	MC	PA	MC	Remarks	Remarks
1	SIAB Shah	Zameer Sadiq	Muzaffargarh	15/4/94	411	12/21	171	15/60	193	11/25	12/27	118	12/55	74/68					Verified	
2	Abdul Wahid	Gul Jan	SAFI	12/8/80	513	12/07	490	16/00	148	12/05	12/27	420	10/35	64/75					Verified	
3	Faris Khan	Shan Badshah	Pandafar	13/3/1987	638	13/10	465	13/50	201	13/13	425	14/27	424	10/35	4/50				Verified	
4	Munaza Khan	Gul Rahman	SAFI	5/9/82	654	14/53	385	12/97	110	12/00	132	13/27	353	13/31	4/35				Verified	
5	ShahMeer Khan	Ghanur Rehman	Ambar	12/12/85	496	11/72	337	14/47	308	11/35	347	4/27	304	10/10	61/52				Verified	
6	Abdul Wali Khan	Gul Zamin	SAFI	11/3/87	557	12/38	487	12/90	307	11/25	347	4/27	382	9/50	17/54				Verified	
7	Abdul Bari Jan	Azeez Gul	Ambar	17/10/86	577	13/19	417	10/95	184	10/23	357	4/27	327	10/10	12/50				Verified	
8	Omar Farooq	Gul Rahman	Bahawal	13/11/76	504	12/31	417	12/82	299	12/07	397	4/27	410	10/15	21/42				Verified	
9	Amer Nawab	Gul Mohammad	SAFI	15/5/84	560	13/18	595	10/82	136	12/22	373	4/27	345	8/65	17/01				Verified	
10	Ziaur Rehman	Sarkul Haq	SAFI	9/8/84	458	10/71	447	14/57	321	11/10	377	4/27	339	10/42	16/57				Verified	
11	Hameedullah	Shereen Muht	Hajmra	2/10/83	613	10/10	417	17/67	110	10/10	110	12/27	345	10/27	58/32				Verified	
12	Fida Mohammad	Saida Khary	Pandafar	30/12/84	485	11/41	415	12/64	110	11/22	377	4/27	401	11/0	51/35				Verified	
13	Ayaz Khan	Qambar Khan	Pandafar	20/3/1981	504	11/27	362	12/73	110	11/10	377	4/27	375	9/38	16/50				Verified	
14	Bacha Sed	Murad Khan	Pandafar	12/3/85	369	9/68	410	12/31	172	11/10	377	4/27	410	10/25	13/24				Verified	

Mr. Mahmood Khan
Assistant Director,
D.E (FATA) Peshawar

Mr. Naveed Khan
Assistant Director,
DT (FATA) Peshawar

Mr. Saleem Khan
Head Master, CAS
Islamabad

Mr. Hussain SST
DHS Headquarter
Mohmand Agency

[Handwritten Signature]

[Handwritten Signature]

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REVISED/ VERIFIED OPEN MERIT LIST OF 11 (MALE) CANDIDATES OF MOHMANI AGENCY FOR FRESH APPOINTMENT (RE-INTERVIEWED BY THE ENQUIRY COMMITTEE W & F 11/2/2015 TO 22/11/2015)

Sl. No.	Name	Category	Age	Height	Weight	Education	Experience	Remarks	Result
15	Abdul Qadir	SAFI	18.04	5.7	55	10	10	10	Verified
16	Abdul Qadir	SAFI	18.05	5.7	55	10	10	10	Verified
✓ 17	Abdul Qadir Sadiq	SAFI	18.05	5.7	55	10	10	10	Verified
18	Ghous Ali	SAFI	18.05	5.7	55	10	10	10	Verified
19	Abdul Kadir	SAFI	18.05	5.7	55	10	10	10	Verified
20	Muhammad Saad	SAFI	18.05	5.7	55	10	10	10	Verified
21	Muhammad Saad	SAFI	18.05	5.7	55	10	10	10	Verified
22	Ghous Saad	SAFI	18.05	5.7	55	10	10	10	Verified
23	Muhammad Saad	SAFI	18.05	5.7	55	10	10	10	Verified
24	Muhammad Saad	SAFI	18.05	5.7	55	10	10	10	Verified
✓ 25	Muhammad Saad	SAFI	18.05	5.7	55	10	10	10	Verified
26	Muhammad Saad	SAFI	18.05	5.7	55	10	10	10	Verified
27	Fazal Wajood	SAFI	18.05	5.7	55	10	10	10	Verified

Mr. Saad
Assistant Director
D.E.T.A.T. Peshawar

Mr. Saad
Assistant Director
D.E.T.A.T. Peshawar

Mr. Saad
Assistant Director
D.E.T.A.T. Peshawar

Mr. Saad
Assistant Director
D.E.T.A.T. Peshawar

Mr. Saad
Assistant Director
D.E.T.A.T. Peshawar



OFFICE OF THE AGENCY EDUCATION OFFICER
MOHMAND AGENCY AT GHALLANAI
P.NO.0924290180 FAX:0924290180

APPOINTMENT ORDER.

In compliance to the decision of the Honorable High Court Peshawar vide Directorate of Education FATA letter No.11547 dated 17/11/2015 and in accordance with the approval of the Departmental Selection committee thereupon verified by the enquiry committee w.e.f. 01/12/2015 to 22/12/2015, The following male candidates of Mohmand Agency are here by appointed against the vacant TT posts purely on temporary basis in BPS-09 @Rs.(8015-495-22865) plus usual allowances as admissible under the rules from the date of their taking over charge in the Schools noted against their names in the interest of public service.

TT= S.No.01 to 14

S.No	Name	Father's Name	Appointed as.	Place of posting.	Remarks
1	Said Ali Shah	Ziarat Said	Theology Teacher	GMS Akhunzadgan	Against vacant post
2	Hameed Ullah	Sherin Muhammad	Theology Teacher	GMS Gahzi Baig	-do-
3	Abubakar Sadiq	Amanat Khan	Theology Teacher	GPS Khuram China	-do-
4	Muhammad Arif	Mir Azam Khan	Theology Teacher	GPS Kamali Yousaf Khel	-do-
5	Abdul Wahid	Gul Jan	Theology Teacher	GHS Sandu Khel	-do-
6	Fazli Wadood	Hazrat Said	Theology Teacher	GPS Kadi No.02	-do-
7	Abdul Khaliq	Oulas Khan	Theology Teacher	GPS Taj Muhammad	-do-
8	Rafi Ullah	Naik Amal	Theology Teacher	GPS Shah Baig Kamali	-do-
9	Faris Khan	Shan Badshah	Theology Teacher	GPS Kadi No.03	-do-
10	Muhammad Tyyeb	Mufti Jan	Theology Teacher	GMS Saparay	-do-
11	Murtaza Khan	Gul Rehman	Theology Teacher	GPS Toor Kore	-do-
12	Abdul Wali Khan	Gul Zamin	Theology Teacher	GPS Sharab Kore	-do-
13	Shah Mir Khan	Ghani ur Rehman	Theology Teacher	GMS Habibzai	-do-
14	Amer Nawab	Gul Muhammad	Theology Teacher	GMS Abdul Baqi	-do-

TERMS/CONDITIONS

1. The appointment of the candidates has been made purely on temporary basis and is liable to termination at any time without assigning any reason.
2. All academic, professional and domicile documents/certificates of the candidates should be verified from the concerned institutions through AEO office before drawl of their salaries, otherwise the DDO will be held personally responsible for the consequences.
3. Charge reports should be submitted to all concerned in duplicate.
4. Health & age certificates obtained from the Agency Surgeon should be provided to this office.
5. Their age should be with accordance to the Govt. Policy.
6. If they failed to report their arrival within 15 days, their appointment orders will be automatically considered as cancelled.
7. If any legal and technical error/ omission pointed out, the appointment orders will be stand cancelled.

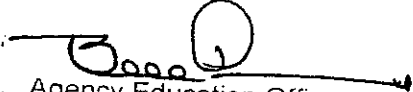
(SAEED GUL)
Agency Education Officer,
Mohmand Agency at Ghallanai

Endst: No. Estab. II/TT/ Apptt/ 451-57 /dated Ghallanai the 15/01/2016. u

- Copy to:-
1. Director of Education, FATA Peshawar w/r to his No. & date mentioned above.
 2. Political Agent Mohmand Agency.
 3. Agency Accounts Officer, Mohmand Agency at Ghallanai.
 4. Agency Surgeon Mohmand Agency at Ghallanai.
 5. Principals/Head Masters concerned with the direction to follow the terms & conditions in letter and spirit as cited above.
 6. AAEO concerned in this office.
 7. Candidates concerned.

Note: - Unattested Photo copy is not accepted.

Hd/


Agency Education Officer,
Mohmand Agency at Ghallanai.

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Name of Applicant

Mr. Fozis Khan

Caste or Tribe

Moham

Father's name

Mr. Shan Bad Khan

Residence

Village: Buno Khal, Yandouch

Tamungry, Terpianchal, Dist. Moham

Date of birth

01-03-1987

Exact height by measurement

5-8

Personal rank of identification

Wm D. N. J. J. J.

Signature of the Official

Fozis

Signature of head of office

Stamp of Office

I do hereby certify that I have examined Mr. Fozis Khan a candidate for employment in the Office of the Education Department and can not discover that he has any disease communicable or other constitutional affection or bodily infirmity except

I do not consider this as disqualification for employment in the Education Department. His age according to his own statement is ... year and by appearance about ... years.

LEFT HAND THUMB AND FINGER IMPRESSIONS



Medical Superintendent, Civil Hospital

MEDICAL SUPERINTENDENT AHQ HOSPITAL CHILLI

من صلی فارسی خان نے حکمہ انجمنیہ کے اردو معلم

45-57 تاریخ 16-01-06 کو گورنمنٹ سکول کوزاری

علم 3 میں اپنے فوٹو T T کا کارڈ سنبھال لیا

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کارے راول

کارے راول

**OFFICE OF THE DISTRICT EDUCATION OFFICER TRIBAL DISTRICT MOHMAND
(SENIOR TT)**

WORKING PAPERS FOR DEPARTMENTAL PROMOTION COMMITTEES FOR THE PROMOTION OF (AT) (MALE) POST TO SAT B-16

Total Number of Vacant Posts of TT	211
1/3 Share of SIT	70
Share of SIT 18/9	61
Already Promoted	72
Available vacant Post of SIT	8
Proposed for Promotion	11

LIST OF TT (M) FOR THE PROMOTION TO SIT-16

S.No.	S.L No.	Name Official	Place of posting.	Date of birth.	D/O Appointment as regular TT.	Qualification		Whether eligible for promotion.	Remarks
						Academic Qualification	Professional Qualification		
								Yes/No	
1	41	Lal Muhammad	GPS Trang Ghar	10/22/1969	11/3/1994	MA	Alama	No	not recommend due to <i>Hitada</i> <i>Alada</i>
2	43	Atta Ullah	GPS Usha Jangra	2/4/1970	11/3/1994	SSC	Shahidul Alam	Yes	<i>Difficult due to Kabitul number</i>
3	59	Abdullah	GPS Fate Ali	2/15/1967	2/14/1995	SSC	Alama	Yes	<i>Recommend.</i>
4	94	Hizbullah	GPS Lakarai	21.6.1982	22.11.2002	MA III	Alama	Yes	<i>Recommend.</i>
5	121	Abdul Sadiq	GPS Nara Sway Prang Ghar	5/15/1977	4/30/2007	SSC/MA Islamiat	Alama	Yes	<i>Recommend.</i>
6	129	Rooh Ullah	GPS Amal Fort No. 2	1/1/1983	9/1/2007	SSC	Alama	Yes	<i>File not provided / Difficult due to <i>dir</i></i>
7	146	Said Ali Shah	GPS Ashrafabad	4/11/1984	16/01/2016	MA Islamiat	MA Islamiat (Alama)	Yes	<i>Recommend.</i>
8	147	Abdul Wahid	GPS Gamar Din	1/2/1985	16/01/2016	MA III	Alama	Yes	<i>Recommend.</i>
9	148	Faris Khan	GPS Kadi No. 01	3/1/1987	16/01/2016	MA Islamiat	Alama	Yes	<i>X</i>

- It is certified that all the TT (Male General) included in the panel for promotion to the posts of SIT B-16.
 - Hold the posts on regular basis and none of them is holding the post on subcontracting charge basis/contract.
 - Have completed the required minimum length of qualifying service and qualifications as required for promotion to the posts of SIT B-16 under the rules.
 - None of them is on deputation to any organisation under the federal/provincial/autonomous/local autonomous/interim organisations.
 - Neither any disciplinary/departmental proceedings/natural corruption/judicial enquiry is pending against them nor have any penalty been imposed upon any one of them during the last five years.
 - None is on long leave/Ex-Pakistan leave.
 - Their ACRs synopsis are free from adverse remarks.
 - They are all alive and serving.
 - Their service books are enclosed herewith.
 - Their last appointment order are attached herewith.
 - The seniority list of DU teachers is final, undisputed and not subject to change.
- The departmental promotion committee is requested to determine the suitability of the above TT for promotion to the posts of SIT B-16.

01/3/21

[Signature]
District Education Officer



C
15

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

Notification

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification NoSO(B&A)/1-18/E&SE/2012 dated 11.07.2012 and Finance Department Endorsement No SO(FR)/FD/10-22(E)/2010 dated 16.07.2012, the following CT/DM/TT and AT Male (BPS-15) are hereby promoted to the post of Senior CT/Senior DM/Senior TT and Senior AT (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, as per terms and condition given below with immediate effect and further they will be posted in the Government High /Higher Secondary Schools by the District Education Officer concerned against the vacant post of Senior CT/Senior DM/Senior TT and Senior AT (BPS-16) respectively:

1. CT to Senior CTs (BPS-16)

S. No.	S.L. No.	Name of Official	Present Place of Posting	Date of Birth	Date of Apptt; as Regular CT	Remarks
1	66	Fazal Rahman	GHS Rahat Kore	01-03-1968	22-12-2005	Services placed at the disposal of District Education Officer (M) Mohmand for further posting
2	67	Mukhtiar Ali	GHSS Prang Ghar	25-02-1969	30-03-2007	-----do-----
3	68	Sadiq Muhammad	GHS Lakarai	10-06-1962	30-03-2007	-----do-----
4	70	Muhammad Ayaz	GMS Muambar Kalai	25-05-1975	30-03-2007	-----do-----
5	71	Khushdil Khan	GHS Subhan Khwar	02-03-1972	30-03-2007	-----do-----
6	72	Raham Dil	GMS Chahari	19-05-1971	13-04-2007	-----do-----
7	73	Adnan Khan	GHS Lakarai	02-03-1974	11-05-2007	-----do-----
8	74	M. Nisar	GMS Musa Kore	15-01-1975	16-05-2007	-----do-----
9	76	Jehangir Khan	GHS Yousaf Khel	23-06-1974	20-09-2007	-----do-----
10	79	Javed Khan	GMS Knadi Issa Khel	03-06-1981	30-11-2009	-----do-----
11	80	Hamid Jan	GHS Hasham Kore	01-02-1981	15-12-2009	-----do-----
12	81	Fazli Manan	GHS Qamar Din Kore	04-01-1982	15-12-2009	-----do-----
13	82	Hayat Khah	GMS Musa Kore	02-03-1979	15-11-009	-----do-----
14	83	Imran	GMS Adin Khei	01-01-1985	15-12-2009	-----do-----
15	84	Fazal Hadi	GHS Navi Kalai Laman	11-01-1977	15-12-2009	-----do-----

Promotion order of Senior Teachers (M) Mohmand. 2

16

16	85	Zahid Ahmad	GMS Nao Prang Ghar	09-04-1979	27-01-2010	-----do-----
17	87	Itbar Jan	GHSS Ghallani	07-10-1968	01-03-2012	-----do-----
18	89	Asfandyar	GMS Suran Dara	01-01-1984	04-09-2014	-----do-----
19	90	Arshad Khan	GHS Akhun Zadgan	12-12-1984	16-01-2016	-----do-----
20	93	Sartaj	GMS Ghazi Baig	28-01-1987	16-01-2016	-----do-----
21	94	Munir Khan	GMS Shawa	14-08-1983	16-01-2016	-----do-----
22	95	Muhammad Hashim Khan	GHSS Ghallani	11-04-1983	16-01-2016	-----do-----
23	96	Akbar Khan	GMS Muslim Kore	18-02-1977	16-01-2018	-----do-----

2. DM TO SENIOR DM BPS-16)

S. No.	S.L. No.	Name of Official	Present Place of Posting	Date of Birth	Date of Apptt; as Regular DM	Remarks
1	17	Bashir Gul	GMS Kandi Issa Khel	14-09-1974	12-09-2003	Services placed at the disposal of District Education Officer (M) Mohmand for further posting

3. TT TO SENIOR TT BPS-16.

S. No.	S.L. No.	Name of Official	Present Place of Posting	Date of Birth	Date of Apptt; as Regular TT	Remarks
1	59	Abdullah	GPS Faiz Abad	15-02-1967	14-02-1995	Services placed at the disposal of District Education Officer (M) Mohmand for further posting
2	94	Hizbullah	GHS Lakarai	21-06-1982	22-11-2002	-----do-----
3	121	Abdul Sadiq	GPS Nao Kalai (Prang Ghar)	15-05-1977	30-04-2007	-----do-----
4	146	Said Ali Shah	GPS Akhun Zadgan	04-11-1984	16-01-2016	-----do-----
5	147	Abdul Wahid	GHS Qamar Din	01-02-1986	16-01-2016	-----do-----

4. AT TO SENIOR AT BPS-16.

S. No.	S.L. No.	Name of Official	Present Place of Posting	Date of Birth	Date of Apptt; as Regular AT	Remarks
1	34	Muhammad Zubair	GMS Navi Kalai	04-06-1975	24-04-2007	Services placed at the disposal of District Education Officer (M) Mohmand for further posting
2	37	Hameedullah	GHS Dab Kore	30-11-1982	12-12-2009	-----do-----

Terms and conditions: -

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

Promotion order of Senior Teachers (M) Mohmand 3

17

- 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 by the Government.
- 4 Charge reports should be submitted to all concerned.
- 5 Their Inter-Se- seniority on lower post will remain intact.
- 6 No TA/DA is allowed for joining them 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, the same will be recovered and if anyone is wrongly promoted he will be reversed.

(Hafiz Dr. Muhammad Ibrahim)

Director

Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst: No.

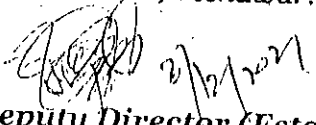
16664-70

/ File No.1/Promotion Senior Teachers (PSB-16)2021

Dated Peshawar the 3/12/2021

Copy forwarded for information and necessary action to the:

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. District Education Officer Mohmand.
3. District Accounts Officer Mohmand.
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)
Merged Districts

Statement

1

18

(19)

I, Mr. Muhammad Ali Khan ADEO (Estab,
 handed over the Removal order/notice
 of Mr. Rookullah IT to Mr. Waheed
 ullah dealing clerk on dated 21⁰⁹/₂₀₂₁
 Beside this I had been totally
 neglected in the whole process of
 promotion. Therefore, I don't know
 about the process please.

Ali Khan

Not Verified
 25/03/2022
 Signature of
 mine

Handwritten notes in Urdu script, partially illegible.

Handwritten notes in Urdu script, including the date 25/03/2022.

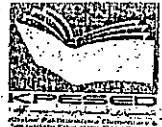
آپ کے اطلاع تکلیف دہ ہے کہ SST اور S/Teacher میں ہجرت
 تکلیف DPC 2022-09-01 سے پیش رفتی ہوگی۔ روئے اللہ سے
 آرڈر جسے 2022-09-28 کے بعد ملا تھا۔ نو نومبر میں کسی روئے اللہ کو
 ورنہ کسی سے نکال لیں۔

اس کے علاوہ یہاں سے سہ ماہی SST 2 SST 8 پوسٹ قابل ہجرت
 کے لیے ہم نے فارسی آڈیٹ کو Reserve کے طور پر 9 دینے
 پر ہر ڈالانہا۔ بصریہ ڈائریکٹوریٹ کی ذمہ داری ہے کہ
 وہ اس کے بعد ہر نظر قابل کی DE سے روئے اللہ آڈیٹ کی
 سر مشین اور ڈائریکٹوریٹ کے ان کے سر مشین کریں۔

28/03/22
 ڈی ایچ او
 ڈی ایچ او
 ڈی ایچ او



OFFICE OF THE DISTRICT EDUCATION OFFICER
MOHMAND TRIBAL DISTRICT



Ph: 0924-290180

Email : -deomohmand@gmail.com

No. 9/61-103

Dated: March 25, 2022

20

INQUIRY NOTIFICATION

(18)

In pursuance of the letter received from the Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department vide No. Gen/SO(C)/E&SED/KPK/1-7/2022/Mr. Faris Khan/SE-Nill dated 22.03.2022 on the subject noted as "Request for promotion from TT to STT (Lodged by Mr. Faris Khan, TT, GPS Baz Mohammad District Mohmand), the undersigned is pleased to nominate **Mr. Sher Ali Principal GHS Lakarai** to probe the instant case and submit his report within three (03) days positively with clear cut recommendations and also fix responsibilities.

*District Education Officer
(Male) Mohmand*

Endst No & Date: Even:
Copy forwarded to the:

- 1) Section Officer (Complaints) with his letter No. and date above.
- 2) Director of Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
- 3) Mr. Sher Ali Principal GHS Lakarai.
- 4) PA to DEO (Male) District Mohmand.

*District Education Officer
(Male) Mohmand*

NOTIFICATION

1. WHEREAS Mr. Roshullah TT GPS Qamar din Tehsil Safi Tribal District Mohmand was found willfully absent from duty and living abroad since 21/11/2019 by concerned ADEO, (M) and 103 Brigade at Mohmand.
2. AND WHEREAS the accused was proceeded against under Khyber Pakhtunkhwa Govt. Servants (Efficiency & Discipline) Rules 2011 for the charge of "willful absence from duty" as mentioned in the show cause notice served upon him under registered post at his home/School address vide DEO No: 5712-18 AALO(M&F) dated 08/11/2019
3. AND WHEREAS Mr. Roshullah TT GPS Qamar din Tehsil Safi Tribal District Mohmand did not report to his duty within stipulated period of time and turned his ears deaf
4. AND WHEREAS Charge sheet was served upon Mr Roshullah TT GPS Qamar din Tehsil Safi Tribal District Mohmand vide charge sheet No 5961-66 dated 22/11/2019 through registered post at his home/school address though the accused was directed to submit reply in his defense through personal contact with the office. But again the absent teacher turned his ears deaf and did not bother to appear before the undersigned
5. AND WHEREAS DEO Tribal District Mohmand published an absentee notice against the accused employee in "Duty Express" Peshawar dated 11/12/2019 and "Daily Aaj" Peshawar on dated 14/12/2019 but the accused employee did not appear before the DEO Office.
6. AND WHEREAS the competent authority, the District Education officer Mohmand, after having considered the charges, evidence on record and facts of the case, is of the view that the charge of willful and unauthorised absence against the accused official has been proved.
7. NOW THEREFORE, in exercise of the Powers conferred under Rules-1 (b) iii of Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules 2011, the competent Authority, District Education officer Tribal District Mohmand is pleased to impose major penalty of "Removal from service" upon Mr. Roshullah TT GPS Qamar din Tribal District Mohmand on account of his willful absence from duty with immediate effect.

Encls: No. 02 Date 02/01/2020

Copy forwarded to:

1. District Education Officer KP Mohmand
2. Deputy Commissioner Tribal District Mohmand
3. District Accounts Officer Tribal District Mohmand
4. PS to Additional Chief Secretary (NMD) for perusal of the Additional Chief Secretary
5. ADEO Mohmand for entry in his service book
6. Accountant local office for stoppage of his pay forth with.
7. Pay clerk local office for entry in his service book.
8. Official concerned
9. Office records

(Jadui Khan Khattak)
District Education Officer,
Tribal District Mohmand
21/11/20

District Education Officer,
Tribal District Mohmand
O/C 21/11/20

22
2
22
DEO صاحب ضلع لہند

درخواست جرن ڈرسٹیٹنگ DPC سنیارٹ لسٹ

جناب عالی!

موردبان گزارش ہے کہ سائل نے اس سے قبل بھی کئی بار آپکو

زبانی طور پر آگاہ کیا ہے جکہ آج جزریہ درخواست گزار کی جانے ہے

کہ حالیہ DPC سنیارٹ لسٹ T.T کیڈر کا مرتب کردہ سنیارٹ لسٹ میں

ایسا ٹرمینٹ شیڈول (روح اللہ T.T) کو شامل کیا گیا ہے جو (02/01/2020) کو
ٹرمینٹ کیا گیا ہے۔

جس وجہ سے سائل (فارس خان T.T) کا پرورش سے محروم رہنے کا اندیشہ ہے

اسلئے آپ صاحبان سے درخواست کی جانے ہے کہ ٹرمینٹ روح اللہ T.T کو

DPC لسٹ سے خارج کریں اور سائل (جو پرورش کا مفدا ہے) کو DPC

لسٹ میں شامل کرنے کے احکامات صادر فرمائے مشور فرمادیں۔

بندہ صاحبان دعا گو رہے گا۔

الغرض!

المورد = 21/09/2021

Ehtis

ایچا تابع فرمان معالی فارس خان T.T

APS باغیچہ فور کھلی یاد عند ضلع لہند

13-12-21

گورنمنٹ جہان DEO صاحب ضلع کوئٹہ

23

Azed

ES-1

درخواست پورٹ عطا کیے پر ووشش

13.12.21
صاحب عالی

موردہ جہان گزارش ہے کہ سائل کی نقلیہ تصدیق میں آ.آ پوسٹ پر

اپنی فرمائش سرانجام دے رہا ہے۔ موجودہ DPC کے لئے جو سہولتیں دستیاب

جاری کیا گیا تھا۔ اس میں پروموشن کیلئے اساتذہ مطلوب تھے۔ سائل کے لیے

پوزیشن پر موجود دو اساتذہ میں ایک پوزیشن اور دوسری اساتذہ

کو مطلوبہ کوالیفیکیشن نہ ہونے کی وجہ سے سائل نامیل میں جسٹس ورنہ

پروموشن کا حقدار ہے لیکن موجودہ DPC میں پروموشن نامیل کیا گیا ہے۔

اسلام

آپ صاحبان سے درخواست ہے کہ سائل کے لئے پروموشن کے

احکامات صادر فرمائیں شکر و تحنون و مابقیں۔

بتذہ نامت دعاؤں کے ساتھ

التاریخ: 11/12/2021

Edris

التاریخ:

ایضاً تاریخ فرمان ضلعی خازن خزانہ جی ڈی CPS بازار ڈیڑھ درختیہ

Jehangir

کلمت جناب ڈائریکٹر صاحب قلم تبلیغ صیغہ چٹوڑا

24

درخواست برائے عطاء سٹیبل پروموشن

3728

ڈائریکٹر صاحب

جناب عالی!

مؤدبانہ گزارش ہے کہ ضلع ٹنڈی کے قلم تبلیغ نے ایپ کے حکم

پر سٹیبل کے لیے جو نوٹیفیکیشن جاری کیا تھا۔ اس میں سائل کا نام نوٹس نمبر 9

وجود ہے جسے پروموشن کے لیے آڈٹ اساتذہ مطلوب ہے۔ لیکن سائل سے ایسا

ان آڈٹ اساتذہ میں سے روح اللہ خان ہے ایف آئی آئی 02/01/2020 میں نوٹیفیکیشن

کیا گیا ہے جسے دو کورس اساتذہ آئی آئی کے ساتھ موجود اساتذہ میں سے کچھ نہیں ہیں۔

اب موجودہ DPC میں سے صرف پانچ اساتذہ کو نوٹیفیکیشن کیا گیا ہے باقی سب کو

نہیں۔ جس کے وجہ سے سائل کا حق بننا ہے کہ وہ چھٹے نمبر پر پروموشن کیا جائے۔

لہذا آپ صاحبان سے درخواست کی جاتی ہے کہ سائل کے لیے پروموشن کا نام اساتذہ موجود ہے

پس موجودہ پروموشن لسٹ میں سے نوٹیفیکیشن روح اللہ خان کا نام شامل کر سائل کے پروموشن

کے احکامات جاری فرمائیے۔

بندگی و دعاؤں کے ساتھ۔

التحریر = 13/12/2021

العارضہ

ایڈیشنل سیکرٹری / سٹیبل پروموشن / ڈائریکٹر صاحب قلم تبلیغ صیغہ چٹوڑا



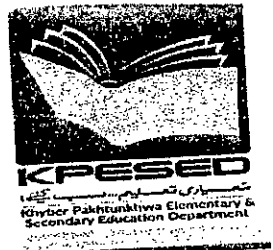
OFFICE OF THE DISTRICT EDUCATION OFFICER
MOHMAND TRIBAL DISTRICT

Ph. No. : 0924-290180

FAX : 924290180

Email : omohmand@gmail.com

Endst: No. /04/2022



To

The Director Education,
&SE Khyber Pakhtunkhwa Peshawar.

Subject: **REQUEST FOR PROMOTION FORM TT TO STT (LODGED BY MR.FARIS KHAN TT GPS BAZ MUHAMMAD DISTRICT MOHMAND.**

Memo:

Reference your office letter No. 3398-3401 dated 25.03.2022 on the subject noted above and to convey that the requisite detail report in the subject matter is hereby submitted for your kind information and further necessary action please as under.

1. **WHEREAS** the dealing assistant and the then committee did not updated the seniority list, but Mr, Faris khan TT was included in the working papers for promotion from TT to STT at S.NO. 9 and the working papers were submitted to the Directorate of Education E&SE KPK Peshawar vide this office letter No. 21 dated 04.01.2022 (Annex A).
2. **AND WHEREAS** due to Alamia from Itehadul Maddaris Mr.Lal Muhammad at S.No. 1 was not recommended in the DPC held on dated 01/09/2021 at Directorate of Education E&SE KPK Peshawar while at S.No.6 Mr.Roohullah was declared deferred as his file was missing.
3. **AND WHEREAS** there are eight (8) posts for the promotion of TT to STT and the complainer is at S.No 9. And only five (5) were recommended and promoted to STT on dated 03/12/2021.
4. **AND WHEREAS** there are 08 seats for promotion quota of (STT), S.No.01 (not recommended) and S.No.6 (Removed teacher).

Therefore the undersigned recommends that Mr. Faris khan TT on S.No. 09 may be considered for promotion from TT to STT on promotion quota as per rules/policy and the complainer is already there at S.No. 9 please.

District Education Officer,
Tribal District Mohmand.

Endst: No. 1705-6 Dated 21 /04/2022

Copy forwarded to the:

1. Additional Director Education (NMD) KP Peshawar
2. Office Record

District Education Officer,
Tribal District Mohmand



OFFICE OF THE DISTRICT EDUCATION OFFICER
MOHMAND TRIBAL DISTRICT
Ph. No. ☎: 0924-290180
FAX ☎: 0924290180



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Email ✉ :- deomohmand@gmail.com

No. 27 Dated: 4/01/2022

To

The Director Education,
E&SE Khyber Pakhtunkhwa Peshawar

Subject: **PROVISION OF DOCUMENTS IN R/O DEFERRED OFFICIALS IN DEFERENT CADERS DISTRICT MOHMAND**

Memo:

A list of deferred teachers in the DPC of District Mohmand for promotion to SCT/SDM/SPET/STT and SAT is hereby recommended and submitted for promotion and further necessary action please.

S.N	Name of Officials	School	Deferred due to	Status	Submission of documents Yes/No	Remarks
CT to SCT						
3	Noor Muhammad CT	GHS Nahqi	Non availability of S/Book	Eligible	Yes	File already provided by this office along with S/B
4	Akhtar Muhammad CT	GHS Pandiali	No CT entry in S/Book	Eligible	Yes	Entry made in S/Book and submitted by this office.
5	Bakht Sher CT	GMS Shawa	File not available	Eligible	Yes	File already provided by this office.
6	Shakir Ullah CT	GMS Hashim kore	File not available	Eligible	Yes	File already provided by this office.
DM TO SDM						
7	Zaheer Ullah DM	GMS Gato warsak		Eligible	Yes	File already check by DPC Committee.
8	Arshad Hussain DM	GMS Shawa	File not available	Eligible	Yes	File already provided by this office.
9	Shahin Shah DM	GHS Lakarai	CNIC	Eligible	Yes	CNIC provided by this office.
AT to SAT						
10	Ashraf Sadiq	GHS Ekka Ghund	Shahdatul Alamia Entry	Eligible	Yes	Entry made in S/Book and submitted
PET TO SPET						
11	Muhammad Ishfaq PET	GMS Akhunzadgan	Share of sanctioned post	Eligible	Yes	Sanctioned post mistake in w/paper is 59, but the sanctioned post of PET is 73.
12	Ijaz Ahmad PET	GHS Pandiali	Share of sanctioned post	Eligible	Yes	Sanctioned post mistake in w/paper is 59, but the sanctioned post of PET is 73.
13	Zakir Hussain PET	GMS Abdul Kore	Share of sanctioned post	Eligible	Yes	Sanctioned post mistake in w/paper is 59, but the sanctioned post of PET is 73.
14	Nasar khan PET	GHS Sandu khel	Share of sanctioned post	Eligible	Yes	Sanctioned post mistake in w/paper is 59, but the sanctioned post of PET is 73.
TT to STT						
15	Faris Khan TT	GPS Baz Muhammad Kore	Termination of Rooh Ullah TT	Eligible	Yes	The termination order of Rooh Ullah TT already submitted by this office.

District Education Officer (M),
Tribal District Mohmand



OFFICE OF THE DISTRICT EDUCATION OFFICER

MOHMAND TRIBAL DISTRICT

Ph. No. ☎: 0924-290180

FAX ☎: 0924290180

Email ✉: eomohmand@gmail.com



NOTIFICATION

Without prejudice to legal remedies available to Provincial Government and in pursuance of judgment of the Peshawar High Court dated 19-02-2020 in WP No.5673-P/2019, Sanction is hereby accorded to the encashment of leave in lieu of LPR for 313 days in respect of Mr. Umair Sher S/O Khan Sher TT (BPS-15) GPS Ajmal Kore Tamanzai Tehsil Pandiali Mohmand Tribal District shall stand retired from Govt. Service with effect from 31/12/2020 (AN) on Pre-Mature retirement. Subject, to CPLA/Appeal of the Provincial Government against aforementioned judgment of Peshawar High Court and any order contrary as and when issued by the Apex Court of Pakistan.

His date of birth, 1st Appointment date, Retirement date, Length of Qualifying Service & Personal Number are as under:

1. Date of birth: 15/01/1970.
2. 1st Appointment: 04/11/1994
3. Date of Retirement: 31/12/2020.
4. Length of Service: 26-01-27 (Y/M/D)
5. Personal No. 103925

(NOOR HASSAN KHAN)
District Education Officer,
Mohmand Tribal District.

Endst: No. 269-73 / Estab: // Retirement Dated Ghallanai the: 21/01/2021.

Copy forwarded to the.

1. District Accounts Officer District Mohmand.
2. EMIS Concerned.
3. Pay Clerk.
4. Official concerned.
5. Office record.

District Education Officer,
Mohmand Tribal District.

Hd



28

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

Block "A" Civil Secretariat, Peshawar

Phone No. 091-9223540

No.Gen/SO(C.)E&SED/KPK/1-7/2022/Mr. Faris Khan/SE-Nil

Dated 08.03.2022

To

The Director,
Elementary & Secondary Education Department,
Khyber Pakhtunkhwa Peshawar

The District Education Officer (Male),
District Mohmand

Subject: REQUEST FOR PROMOTION FROM T.T TO S.T.T (Lodged by Mr. Faris Khan, T.T, GPS Baz Mohammad District Mohmand)

I am directed to refer to the subject cited above and to enclose herewith copy of a self-explanatory application/complaint along-with its enclosures, lodged by Mr. Faris Khan, T.T, GPS Baz Mohammad District Mohmand, with the request to examine the case as per rules/policy and a detailed report may be submitted to this office within a week time positively, please.

Encl: As Above:


(SHAKEEL AHMAD KHATTAKI)
SECTION OFFICER (COMPLAINT)

Endst: of even number & date:

Copy of the above is forwarded to the:

PA to Deputy Secretary (Budget) E&SE Department for information.


SECTION OFFICER (COMPLAINT)



29

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

Block "A" Civil Secretariat, Peshawar

Phone No. 091-9223540

No.Gen/SO(C.)E&SED/KPK/1-7/2022/Mr. Faris Khan/SE-Nil

Dated 31.05.2022

To

The Director,
Newly Merged Tribal Districts,
Elementary & Secondary Education Department,
Khyber Pakhtunkhwa Peshawar

Subject: REQUEST FOR PROMOTION FROM T.T TO S.T.T (Lodged by Mr. Faris Khan, T.T, GPS Baz Mohammad District Mohmand)

I am directed to refer to the subject cited above and to enclose herewith copy of a Inquiry Report/Recommendations, received from Mr. Sher Ali Principal GHS Lakarai Mohmand on the complaint lodged by Mr. Faris Khan, T.T, GPS Baz Mohammad District Mohmand, with the request to implement the Inquiry Report/Recommendations in true letter & spirit, under intimation to this office within a week time positively, please.

Encl: As Above:

**(SHAKEEL AHMAD KHATTAK)
SECTION OFFICER (COMPLAINT)**

Endst: of even number & date:

Copy of the above is forwarded to the:

1. PA to Additional Secretary (Monitoring) E&SE Department.
2. PA to Deputy Secretary (Monitoring) E&SE Department

SECTION OFFICER (COMPLAINT)

30

12

INQUIRY REPORT

AUTHORITY: DEO(M) Mohmand No 1161-63 dated 25/3/2022
VENUES: Office of the District Education Officer (Male) Mohmand
DATED: 30/03/2022

ABSTRACT: Seniority List was not updated by not excluding the terminated teacher, Mr Rooh Ullah Ex-TT GPS Qamar Din Mohmand vide Notification No 9-17 dated 2/1/2020.

BRIEF HISTORY OF THE CASE: In pursuance of the letter of Govt of Khyber Pakhtunkhwa E&SED Peshawar Notification No Gen/So(G) E&SED/KPK/1-7/2022/Mr. Faris Khan /SE-Nil dated 22/3/2022 received by hand from Mr Faris Khan TT GPS Baz Muhammad CNIC 21403-9864533-3 on dated 25/3/2022 and subsequent letter received through Whatsapp vide Directorate of E&SE Khyber Pakhtunkhwa Peshawar No 3398-3401 dated 25/3/2022 on 30/3/2022, the instant inquiry was conducted to prepare a fact finding report about the promotion case from TT to STT as Mr Faris Khan TT was left from promotion in the DPC held on 1/9/2022 and also to fix responsibility upon the officer/official who did not updated the seniority list of TT by not excluded the terminated Ex-TT Mr Rooh Ullah who was removed from service.

Annexure--1 & 2

STATEMENTS: The statements of the main officer and official were recorded as under:

Statement of Muhammad Ali ADEO Establishment: He stated that he handed over the "Removal From Service order" of Rooh Ullah Ex-TT to Waheed Ullah the then dealing clerk on 21/9/2021. He further said that beside this, he was neglected in the whole process of promotion and he did not know about the process.

Annexure---3

Statement of Waheed Ullah the then D/clerk: He said that DPC for the promotion of TT to STT was held on 1/9/2021 and he received the termination order of Rooh Ullah Ex-TT on 21/09/2021 so how could he exclude the name of Rooh Ullah from the working papers. He further said that 8 posts were vacant for STT promotion at that time and Faris TT was placed at 9th in the working papers so it was the responsibility of the Directorate to consider his case.

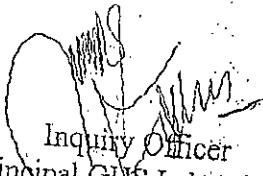
Annexure---4

FINDINGS:

1. Mr. Faris Khan was appointed as TT on 16/01/2016.
2. Total No of posts for the promotion from TT to STT at that time were 8 and according to the dealing clerk, Mr faris was placed at 9th in the working papers as reserve.
3. A list of 15 deferred officials in different cadres including Faris Khan TT from the o/o the DEO Mohmand was forwarded to the Directorate of E&SE with clear remarks of termination of Rooh Ullah Ex-TT vide DEO(M) mohmand No 21 dated 4/01/2022 but in vain.
4. ADEO Establishment is the incharge of his branch and he should circulate the Removal from service order of Rooh Ullah Ex-TT to all branches for necessary action in time which he did not. So Rooh Ullah Ex-STT was not excluded from the seniority list and working paper due to lethargic and irresponsible attitude of Muhammad Ali ADEO Establishment. He handed over the said termination order to Waheed Ullah the then dealing clerk of promotion cases on 21/01/2021 after 20 days of the DPC and about one year, 8 months and 19 days of the issuance of the termination order of Rooh Ullah Ex-TT.

Annexure--5

RECOMMENDATION: The report to the Directorate of E&SE KP Peshawar may be sent with the request for the promotion of Mr. Faris Khan to STT please.


Inquiry Officer
Sher Ali Principal GPS Lakarai Mohmand

'F'

31

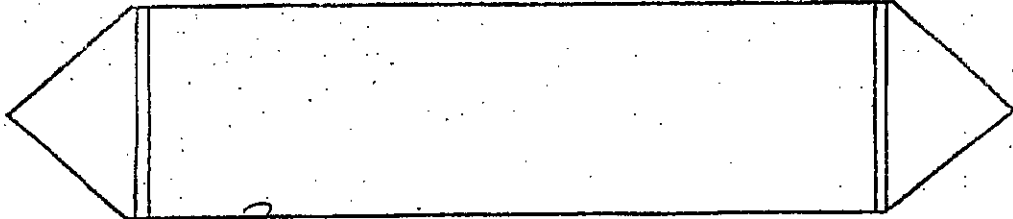
William (Barclay)

Please forward to DCC
Mohammed after this
report on the
issue as advised
by (Barclay)

8/3/02

[Faint, mostly illegible handwritten text covering the majority of the page]

بعد الت صباہ سروس نہ پیونسل کی ہے



2022ء منجانب
خارس خلاہ بنام کورمڈنٹ

موزخہ
مقدمہ
دعویٰ
جزم

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب وہی دکل کاروائی متعلقہ
 آن مقام لہذا کیلئے بسیح اللہ جان عزیز اور بندگی اور بندگی اور بندگی اور بندگی
 مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
 وکیل صاحب کو راضی نامہ کرنے و تقرر حالت فیصلہ پر حلف دیے جواب وہی اور اقبال دعویٰ اور
 بصورت ڈگری کرنے اجراء اور وصولی چیک روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
 زرائیں پر دستخط کرنے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برآمدگی اور منسوخی
 نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
 کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لانا اپنے بجائے تقرر کا اختیار
 ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ
 پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانش التوائے مقدمہ کے سبب سے وہوگا۔
 کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
 مذکور کریں۔ لہذا وکالت نامہ لکھدیا کہ مندر ہے۔

Accepted by
20

13
الرقوم

فاریگان

Fahim

واہ الب

مقام

03335105928

50 روپے

29895



ایڈویکٹ: محمد اسحاق اورنگزی

بار کونسل / ایسوسی ایشن نمبر:

رابطہ نمبر: 03335705928

پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: حسین بخشون قواہ سروک کیم پیوٹرس سہیل

منجانب: ایسٹاٹسٹ

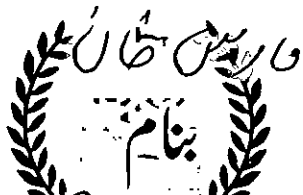
دعویٰ نمبر: Appeal No. 1112/2020

علت نمبر:

مورخہ:

جرم:

تھانہ:



سید شکیل حسین صاحب

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ
 آن مقام محمد اسحاق اورنگزی کیلئے محمد اسحاق اورنگزی کو وکیل مقرر جبکہ
 کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو رید و لیکش
 راضی نامہ کرنے پر تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق مقدمہ
 زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز
 دائرہ کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل باجزوی
 کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب
 مقرر شدہ کو وہی جملہ مذکورہ بااختیارات حاصل ہوں گے اور اس کا سبب ساختہ پر داخلہ منظور و قبول ہوگا
 دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے
 باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے



المرقوم:

مقام: محمد اسحاق اورنگزی کے لیے منظور ہے

نوٹ: اس وکالت نامہ کی نوٹو کاپی ناقابل قبول ہوگی۔

Handwritten signature

Handwritten notes on the left margin: محمد اسحاق اورنگزی، محمد اسحاق اورنگزی، محمد اسحاق اورنگزی

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVECE TRIBUNAL
PESHAWAR

Service Appeal No. 1112-P/2022

Faris Khan District Mohmand.

..... Appellant

Versus

Govt: Khyber Pakhtunkhwa through the chief secretary (E&S Deptt) Peshawar &
other.

..... Respondents

INDEX

S.NO	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGE
1	Parawise Comments	1-3
2	Affidavit	4
3	Copy of the working papers	A	5
4	Copy of the notification	B	7-9
5	Copy of the recommendation	c	10

(13)

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVECE
TRIBUNAL PESHAWAR**

Service Appeal No. 1112-P/2022

Faris Khan District Mohmand

..... Appellant

Versus

**Govt: Khyber Pakhtunkhwa through the chief secretary (E&S Deptt)
Peshawar & other.**

..... Respondents

Joint Parawise Comments on behalf of Respondents No.1- 3

Respectfully Sheweth;

Preliminary objections

- i. That the Hon'ble Tribunal has no jurisdiction to entertain the instant Appeal of this matter being of factual controversy.
- ii. That the appellant has got no cause of action, locus standi to file the instant Appeal against the respondent Deptt.
- iii. That the appellant has not come to this Tribunal with clean hands.
- iv. That the appellant has concealed material facts this Hon'ble Tribunal.
- v. That the appellant has by due to his own conduct.
- vi. That the appeal of the appellant is barred, by law and limitation.
- vii. That the appeal is bad for mis-joinder & non-joinder of necessary parties.

ON FACTS

1. That para-1 has no comments being pertains to the residential record of the Appellant.
2. Pertains to record.
3. Pertains to record.
4. Incorrect. The meeting of DPC was held on 3.12.2021, there were 8 number of vacant post Theology Teachers BPS.16 (Personal) in service 00cadre were proposed for promotion. The appellant was at serial No. 9 in seniority list. Working papers of theology teacher were placed before the DPC which was held on 3.12.2021, the appellant was at serial No.9 in seniority list.

In the Working papers of the eight proposed teachers were discussed in which five Teachers were recommended for promotion while Theology Teachers in Seniority No.1, 2 and 6 were deferred .vid. Notification16064-703.3.12.2021. copy Notification is attached Annex. A.B

- 5. As above in para-4
- 6. Incorrect .Mr. Rooh Ullah Theology Teacher at serial No. 6 in seniority list was deferred being unfit by the departmental promotion committee. Copy is attached Annex .A
- 7. Detail reply of this Para has already been given in Para-4
- 8. Incorrect: The DSC meeting was held on 23-10-2022, there were total five vacant posts of senior Theology Teachers (S.T.T) BPS.16 (personal) were proposed for promotion. Working papers of Theology Teachers were placed before the DPC meeting for promotion along with the appellant is at serial No.1 in seniority list. DPC considered the working papers of the above teachers and recommended the appellant for promotion. Notification of promotion is awaited. Copy of working paper is attached. Annex. (B)
- 9. As replied in Para-5
- 10. Incorrect and denied: That inquiry committee was constituted about the different objection of the Theology teacher on the seniority list.
- 11. As replied in Para-11
- 12. Incorrect.

GROUND.

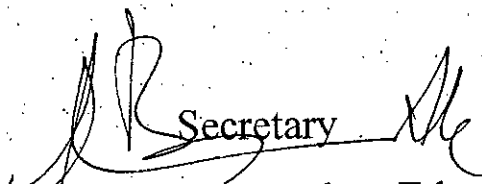
- A. That the appellant is treated according to the fundamental law of the state and constitution Islamic republic of Pakista1973.
- B. incorrect: That the acts of the respondents promotion process of the appellant legal and lawful.
- C. Incorrect: As stated an above Para 5.

- B. incorrect: That the acts of the respondents promotion process of the appellant legal and lawful.
- C. Incorrect: As stated an above Para 5.
- D. incorrect: That the respondents have not been violated any rights of the appellant which protect the constitution of Islamic republic of Pakistan 1973.
- E. Incorrect: That the appellant has been treated with law, rules and regulation by the Deptt.
- F. As stated in above Para 5.
- G. As stated in above Para 9.
- H. That respondent seeks permission to advance other ground and proof at the time of arguments.

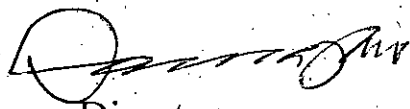
Pray

It is, therefore, most humbly prayed that the appeal of the appellant may be dismissed with cost.

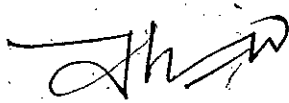
Respondent No. 1


 Secretary
 Elementary & Secondary Education
 Khyber Pakhtunkhwa

Respondent.2


 Director
 Elementary & Secondary Education
 Khyber Pakhtunkhwa

Respondent.3


 District Education officer
 Mohmand

4

BEFORE THE HON'ABLE KHYBER PAKHTUNKHUA SERVICE
TRIBUNAL PESHAWAR

Service Appeal 1112 /2022

Faras khan District Mohmand

.....Appellant

Versus

Education department

.....Respondents

Affidavit

I am Noor bad Shah Assistant District Education officer
(Male) Mohmand do hereby declare and affirm on oath that above
comments are true and correct to the best of my knowledge and belief
and nothing has been concealed from this Hon, rabble court.

MLB
Deponent

ARRESTED



CNIC: 21407-7554585-3

Cell 03019030938

5-03-2022

OFFICE OF THE DISTRICT EDUCATION OFFICER TRIBAL DISTRICT NOWSHAD
(SENIOR TT)

WORKING PAPERS FOR DEPARTMENTAL PROMOTION COMMITTEES FOR THE PROMOTION OF (TT) (RULE) POST TO SAT B-16

Total Number of Vacant Posts of TT	211
1/3 Share of SIT	70
Share of SIT 110A	26
Already Filled	72
Available vacant Post of SIT	9
Processed for Promotion	9

LIST OF TT (M) FOR THE PROMOTION TO SIT-16

S.No.	S.L. No.	Name Official	Place of posting.	Date of Birth.	D/O Appointment as regular TT.	Qualification		Whether eligible for promotion.	Remarks
						Academic Qualification	Professional Qualification		
								Yes/No	
1	41	Lal Muhammad	CPD Peshawar	08/21/1949	11/11/1994	MA	None	No	Not recommended due to physical fitness
2	43	Laila Ullah	CPD Peshawar	2/4/1970	11/11/1994	SIC	None	No	Deferred due to physical fitness
3	59	Abdulrah	CPD Peshawar	7/15/1967	7/14/1995	SIC	None	Yes	Recommended.
4	94	Mudraiah	CPD Peshawar	11/8/1911	22.11.2002	MA/BA	None	Yes	Recommended.
5	121	Abdul Sadiq	CPD Peshawar	1/15/1977	4/00/2007	SIC/MA/BA	None	Yes	Recommended.
6	129	Rashidullah	CPD Peshawar	1/1/1961	31/1/2007	SIC	None	No	File not provided/Deferred due to physical fitness
7	146	Said Ali Shah	CPD Peshawar	1/11/1984	16/01/2016	MA/BA	None	Yes	Recommended.
8	147	Abdul Wahid	CPD Peshawar	1/2/1986	16/01/2016	MA/BA	None	Yes	Recommended.
9	148	Fariq Khan	CPD Peshawar	2/1/1987	16/01/2016	MA/BA	None	No	No

7. It is certified that all the TT (Male General) included in the panel for promotion to the posts of SIT B-16.

(a) Hold the posts on regular basis and none of them is holding the post on adhoc/acting charge basis/contract.

(b) Have completed the required minimum length of qualifying service and qualifications as required for promotion to the posts of SIT B-16 under the rules.

(c) None of them is on deputation to any organization under the federal/provincial/territorial/union territories/intergovernmental organizations.

(d) Neither any disciplinary/departmental proceedings/any criminal/judicial enquiry is pending against them nor has any penalty been imposed upon any one of them during the last five years.

(e) None of them is on long term/Ex-Pakistan leave.

(f) None of them is free from adverse remarks.

(g) All are alive and serving.

(h) All are in the list of regular TT.

(i) All are in the list of regular TT.

(j) All are in the list of regular TT.

(k) The committee is empowered to determine the suitability of the above TT for promotion to the posts of SIT B-16.

01/9/21

District Education Officer



Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Notification

Consequent upon the recommendations 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 11.07.2012 and Finance Department Endorsement No SO(FR)/FD/10-22(E)/2010 dated 16.07.2012, the following CT/DM/TT and AT Male (BPS-15) are hereby promoted to the post of Senior CT/Senior DM/Senior TT and Senior AT (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, as per terms and condition given below with immediate effect and further they will be posted in the Government High /Higher Secondary Schools by the District Education Officer concerned against the vacant post of Senior CT/Senior DM/Senior TT and Senior AT (BPS-16) respectively:

1. CT to Senior CTs (BPS-16)

S. No.	S.L. No.	Name of Official	Present Place of Posting	Date of Birth	Date of Apptt; as Regular CT	Remarks
1	66	Fazal Rahman	GHS Rahat Kore	01-03-1968	22-12-2005	Services placed at the disposal of District Education Officer (M) Mohmand for further posting
2	67	Mukhliair Ali	GHS Prang Ghar	25-02-1969	30-03-2007	do
3	68	Sadiq Muhammad	GHS Lakoral	10-06-1962	30-03-2007	do
4	70	Muhammad Ayaz	GMS Muambor Kalai	25-05-1975	30-03-2007	do
5	71	Khushdil Khan	GHS Suthan Khwar	02-03-1972	30-03-2007	do
6	72	Raham Dil	GMS Chaharl	18-05-1971	13-04-2007	do
7	73	Adnan Khan	GHS Lakoral	02-03-1974	11-05-2007	do
8	74	M. Nisar	GMS Musa Kore	15-01-1975	16-05-2007	do
9	76	Jehangir Khan	GHS Yousaf el	23-06-1974	20-09-2007	do
10	79	Javed Khan	GMS Knadi Issa Khel	03-08-1981	30-11-2009	do
11	80	Hamid Jan	GHS Hasham Kore	01-02-1981	15-12-2009	do
12	81	Fazli Manan	GHS Qamar Din Kore	04-01-1982	15-12-2009	do
13	82	Hayat Khah	GMS Musa Kore	02-03-1979	15-11-009	do
14	83	Imran	GMS Adin Kher	01-01-1985	15-12-2009	do
15	84	Fazal Hadi	GHS Navi Kalai Larnan	11-01-1977	15-12-2009	do

Notification of Senior Teachers (M) Mohmand

16	85	Zahid Ahmad	GMS Nao Prang Ghar	09-04-1979	27-01-2010	-----do-----
17	87	Itbar Jan	GHSS Ghallani	07-10-1968	01-03-2012	-----do-----
18	89	Asfandyar	GMS Suran Dara	01-01-1984	04-09-2014	-----do-----
19	90	Arshad Khan	GHS Akhun Zadgan	12-12-1984	16-01-2016	-----do-----
20	93	Sartaj	GMS Ghazi Bely	28-01-1987	18-01-2016	-----do-----
21	94	Munir Khan	GMS Shawa	14-08-1983	16-01-2016	-----do-----
22	95	Muhammad Hashim Khan	GHSS Ghallani	11-04-1983	16-01-2016	-----do-----
23	96	Akbar Khan	GMS Muslim Kore	18-02-1977	16-01-2016	-----do-----

2. DM TO SENIOR DM BPS-16

S. No.	S.L. No.	Name of Official	Present Place of Posting	Date of Birth	Date of Apptt; as Regular DM	Remarks
1	17	Bashir Gul	CMS Kandi Issa Khel	14-09-1974	12-09-2003	Services placed at the disposal of District Education Officer (M) Mohmand for further posting

3. TT TO SENIOR TT BPS-16

S. No.	S.L. No.	Name of Official	Present Place of Posting	Date of Birth	Date of Apptt; as Regular TT	Remarks
1	59	Abdullah	GPS Faiz Abad	15-02-1967	14-02-1995	Services placed at the disposal of District Education Officer (M) Mohmand for further posting
2	94	Hizbullah	GHS Lakarai	21-06-1982	22-11-2002	do
3	121	Abdul Sadiq	GPS Nao Kalai (Prang Ghar)	15-05-1977	30-04-2007	do
4	146	Said Ali Shah	GPS Akhun Zadgan	04-11-1984	16-01-2016	-----do-----
5	147	Abdul Wahid	GHS Qamar Din	01-02-1988	16-01-2016	-----do-----

4. AT TO SENIOR AT BPS-16

S. No.	S.L. No.	Name of Official	Present Place of Posting	Date of Birth	Date of Apptt; as Regular AT	Remarks
1	34	Muhammad Zubair	GMS Navi Kalai	04-06-1975	24-04-2007	Services placed at the disposal of District Education Officer (M) Mohmand for further posting
2	37	Hameedullah	GHS Dab Kore	30-11-1982	12-12-2009	-----do-----

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 by the Government.
- 4 Charge reports should be submitted to all concerned.
- 5 Their Inter-Se- seniority on lower post will remain intact.
- 6 No TA/DA is allowed for joining them 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, the same will be recovered and if anyone is wrongly promoted he will be reversed.

(Hafiz Dr. Muhammad Ibrahim)

Director

Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst: No. 16664-7e / File No.1/Promotion Senior Teachers (PSB-16)2021

Dated Peshawar the 3/12/2021

Copy forwarded for information and necessary action to the:

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. District Education Officer Mohmand.
3. District Accounts Officer Mohmand.
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)
Merged Districts

OFFICE OF THE DISTRICT EDUCATION OFFICER TRIBAL DISTRICT HOWLAND
(SENIOR TT)

WORKING PAPERS FOR DEPARTMENTAL PROMOTION COMMITTEES FOR THE PROMOTION OF (AT (MALE) POST TO SIT B-16)

Total Number of Vacant Posts of TT	211
1/2 Share of SIT	80
Share of SIT IIA	70
Already Filled	72
Available vacant Post of SIT	4
Prepared for Promotion	5

LIST OF TT (M) FOR THE PROMOTION TO SIT-B-16

S.No.	S.I. No.	Name Official	Place of posting.	Date of Birth.	D/O Appointment as regular TT.	Qualification		Whether eligible for promotion.	Remarks
						Academic Qualification	Professional qualification		
1	41	Lal Abdulhamid	CPD Pong Ghar	26/2/1948	11/1/1994	MA	MA	Yes	not recommended due to 10th class
2	42	Aita Ullah	CPD Pong Ghar	2/4/1970	11/1/1994	BSC	MA	Yes	Deficient due to Rabitah under 16.
3	39	Abdulrah	CPD Pong Ghar	2/12/1957	2/14/1995	BSC	MA	Yes	Recommended.
4	94	Mubtashah	CPD Pong Ghar	11/8/1964	22/11/2002	BSC	MA	Yes	Recommended.
5	121	Abdul Sadiq	CPD Pong Ghar	1/12/1977	4/30/2007	BSC/MA	MA	Yes	Recommended.
6	129	Rooch Ullah	CPD Pong Ghar	1/1/1981	31/1/2007	BSC	MA	Yes	File with President/Deficient due to 10th class
7	146	Sa-TAR Shah	CPD Pong Ghar	4/11/1984	15/01/2016	BSC/MA	MA	Yes	Recommended.
8	147	Abdul Wahid	CPD Pong Ghar	1/2/1986	16/01/2016	BSC/MA	MA	Yes	Recommended.
9	148	Faris Khan	CPD Pong Ghar	1/1/1987	16/01/2016	BSC/MA	MA	No	No

2. It is certified that all the TT (Male General) included in the panel for promotion to the posts of SIT B-16.
- (a) Held the posts on regular basis and none of them is holding the posts on adhoc/acting charge basis/contract.
 - (b) Have completed the required minimum length of qualifying service and qualified as required for promotion in the posts of SIT B-16 under the rules.
 - (c) None of them is on deputation to any organization under the federal/provincial/territorial/union/departmental/intergovernmental organization.
 - (d) Neither any disciplinary/departmental proceedings/any criminal/judicial enquiry is pending against them nor has any penalty been imposed upon any one of them during the last five years.
 - (e) None of them is on long leave/compassionate leave.
 - (f) None of them is on long leave/compassionate leave.
 - (g) None of them is on long leave/compassionate leave.
 - (h) None of them is on long leave/compassionate leave.
 - (i) None of them is on long leave/compassionate leave.
 - (j) None of them is on long leave/compassionate leave.
 - (k) None of them is on long leave/compassionate leave.
 - (l) None of them is on long leave/compassionate leave.
 - (m) None of them is on long leave/compassionate leave.
 - (n) None of them is on long leave/compassionate leave.
 - (o) None of them is on long leave/compassionate leave.
 - (p) None of them is on long leave/compassionate leave.
 - (q) None of them is on long leave/compassionate leave.
 - (r) None of them is on long leave/compassionate leave.
 - (s) None of them is on long leave/compassionate leave.
 - (t) None of them is on long leave/compassionate leave.
 - (u) None of them is on long leave/compassionate leave.
 - (v) None of them is on long leave/compassionate leave.
 - (w) None of them is on long leave/compassionate leave.
 - (x) None of them is on long leave/compassionate leave.
 - (y) None of them is on long leave/compassionate leave.
 - (z) None of them is on long leave/compassionate leave.

Handwritten signature and date: 01/9/21

Printed name and title: District Education Officer