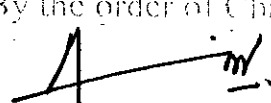


FORM OF ORDER SHEET

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

Appeal No. 1540/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	25/07/2023	<p>The appeal of Mr. Pervez Kamal resubmitted today by Mr. Javed Iqbal Gulbela Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <b>31-07-2023</b>.</p> <p>By the order of Chairman  REGISTRAR</p>

15

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA SERVICES  
TRIBUNAL PESHAWAR**

In S.A. 15110 /2023

Pervez Kamal

**VERSUS**

Govt of KPK & Others

**INDEX**

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5.	Copy of Notification dated.01/12/2022 and Posting Order	"A & A/1"	9-16
6.	Copies of pay slips	"B"	17-19
7.	Copy of the impugned withdrawal dated 24/03/2023	"C"	20
8.	Copy of departmental appeal	"D"	21
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Dated: 19/07/2023

*Pervez Kamal*  
Appellant

Through

*Javed Iqbal Gulbela*  
JAVED IQBAL GULBELA  
Advocate Supreme Court of  
Pakistan.

Off Add: 9-10A Al-Nimrah Centre, Govt College Chowk Peshawar

①

**BEFORE THE HO'NBLE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL**  
**PESHAWAR**

In S.A. 1540 /2023

Case No. 6658  
Dated 21/07/23

***Pervez Kamal*** S/o Abdur Rahim Khan R/o Nar Superlai, P/O Serai Norang, Nar Kashmir Musa khel, Tehsil Serai Norang, District Lakki Marwat.

---Appellant

**VERSUS**

1. ***Secretary Elementary*** and Secondary Education, Khyber Pakhtunkhwa, Civil Secretariat Peshawar.
2. ***Director Elementary*** and Secondary Education Khyber Pakhtunkhwa at Directorate Elementary and Secondary Education, Peshawar.
3. ***District Education Officer*** Lakki Marwat

--- Respondents

**Appeal u/s 4 of the hyber Pakhtunkhwa Service Tribunal Act 1974 against the impugned Order Dated.24/03/2023 of the Office of District Education Officer Lakki Marwat whereby the promotion order of the Appellant has been illegally withdrawn in a classically cursory and whimsical manner.**

**Respectfully Sheweth,**

1. That the Appellant is a naturally born bona-fide citizen of Islamic Republic of Pakistan and hails from a respectable family.
2. That after going through mandatorily required criteria laid down for selection and appointment, the Appellant got appointed as Primary School Teacher (BPS-12) years back.
3. That even after serving for many years the Appellant's career is clean and clear of any sort of soot or sootage, and there has never been any complaint whatsoever even moved against the Appellant.

4. That during the course of service, the Appellant was properly and validly promoted to the post of S.S.T (BPS-16) vide Notification No.3997-400/ dated.01/12/2022 of the office of Elementary and Secondary Education KPK Peshawar. (Copy of Notification and Posting Order are annexed as annexure "A & A/1")
5. That after being promoted as S.S.T (BPS-16) the Appellant properly submitted arrival report and joined duty as S.S.T (BPS-16).
6. That the appellant started performing duties as S.S.T (BPS-16) and getting started salary of BPS-16.(Copies of pay slips are annexed as annexure "B")
7. That while the Appellant was performing his duties with full devotion, that out of the blue and without of any rim or reason, the promotion order of the Appellant was illegally withdrawn vide impugned order No.2516-21 dated.24/03/2023 of the office District Education Officer. (Copy of the impugned withdrawal dated 24/03/2023 is annexed as annexure "C")
8. That the Appellant preferred a departmental appeal, but even after laps of statutory period, nothing came out of the same, hence the instant service appeal.(Copy of departmental appeal is annexed as annexure "D")
9. That feeling aggrieved, the Appellant prefers the instant service appeal for setting aside the impugned withdrawal of promotion order and restoration of promotion of the Appellant with all back benefits upon the following grounds, inter-alia:

**GROUND:**

- A. That the impugned order of withdrawal of promotion is wrong, illegal and void and not sustainable at all.
- B. That the impugned order is the result of colorful exercise of the discretionary power vested in the Respondents and not tenable at all.

- C. That the impugned order has been passed at the back of the Appellant and thus the Appellant has been condemned unheard.
- D. That under the law where an order is passed and it has taken effect and certain rights are created in favor of the effected Civil Servant, then such orders cannot be withdrawn, altered or rescinded at all.
- E. That ever otherwise the Appellant has validly and properly been promoted in a fair and transparent manner and thereafter the Appellant has rendered services and has received salaries of the promoted grade, then without any fault on part of the Appellant the same cannot be withdrawn.
- F. That no prior notice has ever been issued to the Appellant before withdrawal of the promotion order.
- G. That from every angle the withdrawal of the promotion order is wrong, illegal and void.
- H. That under the mandate of Article 4 of the Constitution, no one should be treated otherwise than in an accordance with law, wherein Article 25 postulates that alike are to be treated alike, but here a different discriminative approach has been used to treat the Appellant.
- I. That discrimination in any form is highly abominable and bete-noire and is always checked down in derisorous manner by the Superior Courts of the land. Reason behind checking it down and chucking it away is to ensure equality and equal treatment of its citizens and to remove any sense of discrimination.
- J. That the law and law courts of the land have always preferred and encouraged that rules and policies are to be followed and have always discouraged, deplored, and depreciated any variation from the rules or policies.
- K. That any other ground not raised here may graciously be allowed to be raised at the time of arguments.

*It is, therefore, most humbly prayed that on acceptance of the instant Service Appeal, the impugned Order No: 2516-21 dated. 24/03/2023 of the office of District Education Officer Lakki Marwat may very graciously be declared as illegal, void and be struck down and cancelled and by doing so the Respondents be*

(4)

directed to restor the Appellant on the post of S.S.T  
(BPS-16) with all back benefits.

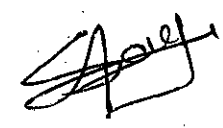
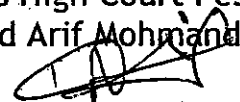
Any other relief not specifically asked for may  
also graciously be extended in favor of the Appellant in  
the circumstances of the case.

Dated: 19/07/2023

  
Appellant

Through

Javed Iqbal Gulbela  
Advocate, Supreme Court of  
Pakistan 

Saghir Iqbal Gulbela   
Advocates High Court Peshawar.  
Muhaamad Arif Mohmand  
Advocate 

**NOTE:-**

No such like appeal has earlier been filed by me before this Hon'ble  
Tribunal, prior to this one.

Advocate 

(S)

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

S. Appeal No- \_\_\_\_\_/2023

Parvez Kamal

Versus

Govt of KPK & Others

**AFFIDAVIT**

I, Parvez Kamal S/o Abdur Rahim Khan R/o Nar Superlai, P/O Serai Norang, Nar Kashmir Musa Khel, Tehsil Serai Norang, District Lakky Marwat, do hereby solemnly affirm & declare on oath that all contents of the instant Service Appeal are true & correct to the best of my knowledge and belief & nothing has been concealed from this Hon'ble Tribunal.

  
DEPONENT

CNIC# 11201-0324641-9  
Cell# 0305-9138442

Identified By:

Javed Iqbal Gulbena<sup>2</sup>  
Advocate, Supreme Court,  
of Pakistan.



(6)

**BEFORE THE HON'ABLE KHYBER**  
**PAKHTUNKHWA SERVICES TRIBUNAL**  
**PESHAWAR**

In S.A \_\_\_\_\_/2023

Pervez Kamal

**VERSUS**

Govt of KPK & Others

**Application for Temporary Injunction.**

**RESPECTFULLY SHEWETH.**

1. That the petitioner is filing the accompanying appeal, the contents of which may graciously be considered as integral part and parcel of the instant petition.
2. That prima facie case exist in favour of the Petitioner.
3. That if the impugned notification as mentioned above is not suspended the Petitioner will suffer irreparable loss.
4. That balance of convenience is also lies in favor of Petitioner and is quite sanguine of her success.

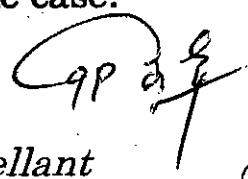


5. That in the given circumstances the suspension of operation of the impugned notifications are indispensable.

It is, therefore, most humbly prayed that on acceptance of the instant petition the respondent be directed to keep one post of S.S.T (BPS-16) vacant till the final disposal of the accompanying appeal.

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

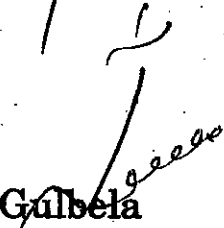
Dated: 19/07/2023



Appellant

Through

Jveed Iqbal Gulbela  
Advocate High Court  
Peshawar



8

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA SERVICES  
TRIBUNAL PESHAWAR**

In S.A \_\_\_\_\_/2023

Pervez Kamal

**VERSUS**

Govt of KPK & Others

**ADDRESSES OF PARTIES**

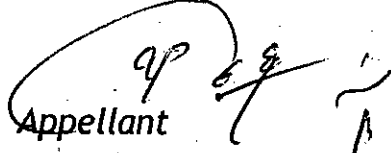
**APPELLANT.**

***Pervez Kamal S/o Abdur Rahim Khan R/o Nar Superlai, P/O Serai Norang, Nar Kashmir Musa khel, Tehsil Serai Norang, District Lakki Marwat.***


**RESPONDENTS:**

- 1. Secretary Elementary and Secondary Education, Khyber Pakhtunkhwa, Civil Secretariat Peshawar.***
- 2. Director Elementary and Secondary Education Khyber Pakhtunkhwa at Directorate Elementary and Secondary Education, Peshawar.***
- 3. District Education Officer Lakki Marwat***

Dated: 19/07/2023

  
Appellant

Through

  
**JAVED IQBAL GULBELA**  
Advocate Supreme Court of  
Pakistan



(2) (9)

## Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

Ann - A

### 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/SCT, DM/SDM, AT/SAT, TT/STT, Qari/S.Qari and PSHT/SPST/PST (Male) are promoted to the posts of **SST (General)**, **SST (Bio/Chem)** and **SST (Maths/Phy)** in BPS-16 (Rs.28070-2260-95870) respectively, plus usual allowances 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.

### A. SST (General)

#### ITEM NO.1:- PROMOTION OF CT/SCT TO SST (G) BPS-16 ON REGULAR BASIS

The case of promotion of CT SCT to the post of SST (G) BPS-16 was considered and the DPC recommended as under:-

Total No. of Vacant Post of SST(G)	20
25% Initial Recruitment Quota	5
75% by Promotion Quota	15
<b>40% CT/SCT Promotion quota to SST(G)</b>	<b>8</b>
Proposed for Promotion to SST(G)	<b>08</b>

S. No	Sen #	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular CT	Academic & Professional Qualification	Remarks
1.	1	Mir Kabul Khan	GHSS Sarai Naurang.	01-10-1963	20-10-1982	BA, DAE, B.Ed	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
2.	36	Mir Abbas Khan	GHS Zangi Khel	08-08-1963	05-04-1999	MA, CT, B.Ed	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
3.	37	Abdul Qayum Khan	GHSS Sarai Naurang	15-12-1970	05-04-1999	MA, CT, B.Ed	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
4.	38	Ikram Ullah	GHS Dalo Khel	10-01-1969	23-12-1999	MA, CT, B.Ed	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
5.	40	Bashir Ahmad	GHSS Sarai Naurang	08-03-1969	23-12-1999	MA, B.Ed	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
6.	42	Habib ur Rehman	GHSS Tajazai	28-03-1970	23-12-1999	MA, B.Ed	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

7.	43	Javed Iqbal	GHS Isak Khel	01-08-1975	23-12-1999	MA, B.Ed	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
8.	45	Asmat Ullah Khan	GHSS Wanda Amir	12-04-1967	23-12-1999	MA, Gen CT, B.Ed	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

**ITEM NO.2: -PROMOTION OF DM/SDM TO SST (G) BPS-16 ON REGULAR BASIS**

The case of promotion of DM/SDM to the post of SST (G) BPS-16 was considered and the DPC recommended as under:-

Total No. of Vacant Post of SST(G)	20
25% Initial Recruitment Quota	5
75% by Promotion Quota	15
<b>4% DM/SDM Promotion quota to SST(G)</b>	<b>0.8=1</b>
Proposed DM/SDM for Promotion to SST(G)	01

S.No	Sen #	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular DM	Academic & Professional Qualification	Remarks
1.	9	Yousaf Khan	GHS Nar Muzaffar Khan.	10-02-1966	17-12-1989	MA, B.Ed	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

**ITEM NO.3:- PROMOTION OF AT/SAT TO SST (G) BPS-16 ON REGULAR BASIS**

The case of promotion of AT/SAT to the post of SST (G) BPS-16 was considered and the DPC recommended as under:-

Total No. of Vacant Post of SST(G)	20
25% Initial Recruitment Quota	5
75% by Promotion Quota	15
<b>4% AT/SAT Promotion quota to SST(G)</b>	<b>0.8=1</b>
Proposed AT/SAT for Promotion to SST(G)	01

S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular AT	Academic & Professional Qualification	Remarks
1.	18	Hidayat Ur Rehman	GSBAKHSS Naurang	12-02-1970	05-04-1999	MA, B.Ed.	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

**ITEM NO.4:- PROMOTION OF TT/SIT TO SST (G) BPS-16 ON REGULAR BASIS**

The case of promotion of TT/SIT to the post of SST (G) BPS-16 was considered and the DPC recommended as under:-

Total No. of Vacant Post of SST(G)	20
25% Initial Recruitment Quota	5
75% by Promotion Quota	15
<b>4% TT/SIT Promotion quota to SST(G)</b>	<b>0.8=1</b>
Proposed TT/SIT for Promotion to SST(G)	01

11

S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular TT	Academic & Professional Qualification	Remarks
1.	11	Bismillah Jan	GHS Gandhi Khan Khel	11-03-1971	16-09-2005	MA, B.Ed	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

**ITEM NO.6:- PROMOTION OF PST/SPST/PSHT TO SST (G) BPS-16 ON REGULAR BASIS**

The case of promotion of PST/PSHT/SPST to the post of SST (G) BPS-16 was considered and the DPC recommended as under:-

Total No. of Vacant Post of SST(G)	20
25% Initial Recruitment Quota	5
75% by Promotion Quota	15
20% PST/SPST/PSHT to SST(G)	4
Proposed PST/SPST/PSHT for Promotion to SST(G)	04

S.No	Sen #	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular PST	Academic & Professional Qualification	Remarks
1.	64	Insaf Ullah	GPS MUHAMMAD NAWAZ GHAZNI KHEL	03-02-1970	02-11-2013	MA/ PTC, CT, B. Ed	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
2.	113	Muhammad Ajmal Khan	GPS AMIN JABU KHEL	01-07-1971	02-11-2013	BA/PTC, CT, B,Ed	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
3.	114	Muhammad Iqbal Khan	GPS Haqdad Abad No.1 Lakki	08-04-1972	11-02-2013	MA/PTC, CT, B.Ed	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
4.	115	Kiramata Ullah Khan	GPS Kotka Shah Slaim	05-05-1972	11-02-2013	BA/PTC, CT, B,Ed	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

**B. SST (Bio/Chem)**

**ITEM NO.1:- PROMOTION OF CT/SCT TO SST (Bio/Chem) BPS-16 ON REGULAR BASIS**

The case of promotion of CT SCT to the post of SST (Bio/Chem) BPS-16 was considered and the DPC recommended as under:-

Total No. of Vacant Post of SST(Bio/Chem)	14
25% Initial Recruitment Quota	3.5=3
75% by Promotion Quota	10.5=11
40% CT/SCT Promotion quota to SST(Bio/Chem)	5.6=5
Proposed for Promotion to SST(Bio/Chem)	5

12

S.No	Sen #	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular CT	Academic & Professional Qualification	Remarks
1.	112	Dilawar Shah (SCT)	GSBAKHSS Naurang	10-04-1973	11-05-2012	MSc (H). Agriculture, B.Ed	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (Bio-Chem) BPS-16 on regular basis with immediate effect.
2.	154	Akbar jan Khan (CT)	GHS Mela Mandra Khel	10-11-1985	27-05-2014	B.Sc B/C B/C, B.Ed	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (Bio-Chem) BPS-16 on regular basis with immediate effect.
3.	157	Muhammad Daud Khan (CT)	GMS Multan Manjiwala	06-02-1984	27-05-2014	MSc/CT, B.Ed B/C	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (Bio-Chem) BPS-16 on regular basis with immediate effect.

**ITEM NO.5:- PROMOTION OF PST/SPST/PSHT TO SST (Bio/Chem) BPS-16 ON REGULAR BASIS**

The case of promotion of PST/PSHT/SPST to the post of SST (Bio/Chem) BPS-16 was considered and the DPC recommended as under:-

Total No. of Vacant Post of SST(Bio/Chem)	14
25% Initial Recruitment Quota	3.5=3
75% by Promotion Quota	10.5=11
20% PST/SPSTPSHT to SST(Bio/Chem)	2.8=3
Proposed PST/SPSTPSHT for Promotion to SST(Bio/Chem)	03

S.No	Sen #	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular PSHT	Academic & Professional Qualification	Remarks
1	429	Muhammad Zaman	GPS Kotka Mahmood No.2	20-03-1981	23-04-2019	MSC, BSC (B/C), B.ED	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (Bio-Chem) BPS-16 on regular basis with immediate effect.
2	431	Pervaiz Kamal	GPS Nar Pur Dil Begu Khel	01-01-1982	23-04-2019	B.SC(B/C), B.Ed	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (Bio-Chem) BPS-16 on regular basis with immediate effect.

13

**ITEM NO.3:- PROMOTION OF AT/SAT TO SST (Maths/Phy) BPS-16 ON REGULAR BASIS**

The case of promotion of AT/SAT to the post of SST (Maths/Phy) BPS-16 was considered and the DPC recommended as under:-

Total No. of Vacant Post of SST(Maths/Phy)	23
25% Initial Recruitment Quota	5.75=6
75% by Promotion Quota	17.25=17
<b>4% AT/SAT Promotion quota to SST(Maths/Phy)</b>	<b>0.92=1</b>
<b>Proposed AT/SAT for Promotion to SST(Maths/Phy)</b>	<b>01</b>

S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular AT	Academic & Professional Qualification	Remarks
1.	24	Mishbah ullah Khan (AT)	GMS wanda amir lakki	01/01/1985	05/03/2016	MA B.Sc (Maths/Phy) B.Ed	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (Maths/Phy) BPS-16 on regular basis with immediate effect.

**ITEM NO.5:- PROMOTION OF Qari/S Qari TO SST (Maths/Phy) BPS-16 ON REGULAR BASIS**

The case of promotion of Qari/S Qari to the post of SST (Maths/Phy) BPS-16 was considered and the DPC recommended as under:-

Total No. of Vacant Post of SST(Maths/Phy)	23
25% Initial Recruitment Quota	5.75=6
75% by Promotion Quota	17.25=17
<b>3% Qari/Sr.Qari Promotion quota to SST(Maths/Phy)</b>	<b>0.69=1</b>
<b>Proposed Qari/Sr.Qari for Promotion to SST(Maths/Phy)</b>	<b>01</b>

S.No	Sen #	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular Qari	Academic & Professional Qualification	Remarks
1.	21	Rafi Ullah Khan	GSMGKCM HS NO.1 LAKKI	22-03-1986	28-05-2019	MA, BSc (M/P) B.Ed.	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (Maths/Phy) BPS-16 on regular basis with immediate effect.

**ITEM NO.6:- PROMOTION OF PST/SPST/PSHT TO SST (Maths/Phy) BPS-16 ON REGULAR BASIS**

The case of promotion of PST/PSHT/SPST to the post of SST (Maths/Phy) BPS-16 was considered and the DPC recommended as under:-

Total No. of Vacant Post of SST(Maths/Phy)	23
25% Initial Recruitment Quota	5.75=6
75% by Promotion Quota	17.25=17
<b>20% PST/SPST/PSHT to SST(Maths/Phy)</b>	<b>4.6=4</b>
<b>Proposed PST/SPST/PSHT for Promotion to SST(Maths/Phy)</b>	<b>04</b>

S.No	Sen #	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular PSHT	Academic & Professional Qualification	Remarks
1.	358	Noor Badshah	GPS Jalu Khel	05-12-1972	14-06-2017	M.SC ,BSc (M/P),B.ED	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (Maths/Phy) BPS-16 on regular basis with immediate effect.

JAVED IQBAL GULBELA  
Advocate  
Supreme Court of Pakistan  
(SC # 5317)

2.	360	Shah Baz Khan	GPS Bakhmal Ahmad Zai	26-01-1973	14-06-2017	M.SC (M/P), B.ED	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (Maths/Phy) BPS-16 on regular basis with immediate effect.
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14

**Terms and Conditions:-**

1. They shall be on probation for the period as specified I Rules (15) substituted vide - No.SO(Policies)/E&AD/1-3/2017 Dated. 07-12-2017 in Appointment, Promotion and Transfer Rules, 1989.
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 as per Rules (17)(4) of Appointment, Promotion and Transfer Rules, 1989.
6. No.TA/DA is allowed for joining the 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 light 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 qualification as per rules, they may not be handed over the charge of the post.

3997-4001

(Hafiz Dr. Muhammad Ibrahim)  
Director  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

Endst: No \_\_\_\_\_ / File No.1/Promotion of SST (BPS-16)/2022 Dated Peshawar the 01/12/2022  
Copy forwarded for information and necessary action to the: -

1. District Education Officer (M) Lakki Marwat.
2. District Accounts Officer Lakki Marwat.
3. Officials Concerned.
4. Principal/HM 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.

*[Signature]*  
01/12/2022  
Assistant Director (Estab)  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

JAVED IOBAH GULBELA  
Advocate  
Supreme Court of Pakistan  
(ASC # 5317)





(8)  
**OFFICE OF THE DISTRICT EDUCATION OFFICER**  
**MALE LAKKI MARWAT**

15

☎ 38291. ✉ info@education.gov.pk ✉ www.facebook.com/educationlakki ✉ www.education.gov.pk

**OFFICE ORDER:**

Am-AT/2

Consequent upon the recommendation of the Departmental Promotion Committee & in pursuance of the Govt of Khyber Pakhtunkhwa Elementary & Secondary Education Notification No SO(B&AO)/1-18/E&SE/2012 dated 11-07-2012 & Finance department Endorsement No SO (FR)/FD /10-22(E) 2010 dated 16-07-2012 & Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar Notification bearing No.3997-4001/file No.1/Promotion of SST (BPS-16)/2022 dated 01/12/2022, the following SCT/CT,SDM/DNI, AT/SAT,TT/STT, Qari/S.Qari and PSHT/SPST/PST (Male) are hereby promoted to the post of SST (General), SST (Bio-Chem) and SST (Maths/Phy) respectively in BPS-16 (RS.28070-2260-95870), plus usual allowance as admissible under the rules on regular bases under existing rules/policy of the Provincial Govt, on the terms & condition given below & further adjusted against vacant post in the school mentioned against each with immediate effect, in the best interest of the public service.

<b>SST (General)</b>			
S.No.	Name with present place of posting	Further Place of Posting as SST	Remarks
1.	Mir Kabal Khan SCT GSBKHS Serai Naurang	GSBKHS Serai Naurang	A.V.P
2.	Mir Abbas Khan SCT GHS Zangi Khel	GHS Top Takhti Khel	A.V.P
3.	Abdul Qayum Khan SCT GSBKHS Serai Naurang	GMS Nazar Jan Bhattaini	A.V.P
4.	Ikram Ullah SCT GHS Daloo Khel	GHS Daloo Khel	A.V.P
5.	Bashir Ahmed SCT GSBKHS Serai Naurang	GHSS Kheru Khail Pakka	A.V.P
6.	Habib Ur Rehman SCT GHSS Tajazai	GHSS Tajazai	A.V.P
7.	Javed Iqbal SCT GHS Isak Khel	GHS Shamoni Khattak	A.V.P
8.	Asmat Ullah Khan SCT GHSS Wanda Amir	GHS Wanda Baru	A.V.P
9.	Yousaf Khan SDM GHS Nar Muzaffar Khan	GHS Wanda Aurang Zaib	A.V.P
10.	Hidayat Ur Rehman SAT GSBKHS Serai Naurang	GHS Wanda Samandi	A.V.P
11.	Bismillah Jan STT GHS Gandhi Khan Khel	GHS Abassa Khattak	A.V.P
12.	Insaf Ullah PSHT GPS Muhammad Nawaz Ghazni Khel	GMS Nawaz Malla Khel	A.V.P
13.	Muhammad Ajmal Khan PSHT GPS Amin Jabu Khel	GHS Amir Wali	A.V.P
14.	Muhammad Iqbal Khan PSHT GPS No.1 Haqdad Abad Lakki	GHS Zar Khan Sur Band	A.V.P
15.	Kiramat Ullah Khan PSHT GPS Kotka Sha. Slaim	GHS Bragi	A.V.P
<b>SST (Bio/Chem)</b>			
16.	Dilwar Shah SCT GSBKHS Serai Naurang	GHS Abassa Khattak	A.V.P
17.	Akbar Jan CT GHS Mela Mandra Khel	GHSS Abdul Khel	A.V.P
18.	Muhammad Daud Khan CT GMS Multan Manjiwala	GHS Bragi	A.V.P
19.	Muhammad Zaman PSHT GPS Kotka Mahmood No.2	GHS Wanda Aurang Zaib	A.V.P
20.	Pervaiz Kamal PSHT GPS Nar Pur Dil Begu Khel	GHS Top Takhti Khel	A.V.P
<b>SST (Maths/Phy)</b>			
21.	Mishah Ullah Khan AT GMS Wanda Amir	GHS Mandan Manjiwala	

JAVED BAL GULBEHA  
Supreme Court of Pakistan  
(ASC # 517)

22.	Rafi Ullah Khan S.Qari GSMGKCMHS No.1 Lakki	GHS Dallo Khel	A.V.P
23.	Noor Badshah PSHT GPS Jalu Khel	GHSS Kot Kashmir	A.V.P
24.	Shah Baz. Khan PSHT GPS Bakmal Ahmad Zai	GHS GPS Baisat Khel	A.V.P
<b>CONSEQUENTIAL TRANSFER</b>			
1	Zahid Iqbal SST (General) GHSS Kheru Khel Pacca	GMS Wanda Amir Alam	AVP

**TERMS AND CONDITIONS:**

1. They shall be on probation for the period as specified in Rules (15) substituted vide No.50 (Policies)/E&AD/1-3/2017 dated 07/12/2017 in Appointment, Promotion and Transfer Rules, 1989.
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 time to time.
4. Charge report should be submitted to all concerned.
5. Their inter-se seniority on lower post will remain intact as per Rules (17) (4) of Appointment, Promotion and Transfer Rules, 1989.
6. No TA/DA is allowed for joining the duty.
7. They will give an undertaking to be recorded in their service books/personal files to the effect that if any over payment is made to them in 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 required relevant qualification as per rules, they may not be handed over the charge of the post.

/

**District Education Officer  
(Male) Lakki Marwat**

Endst No. 8230-37

Dated 12/12/2022

Copy to the:

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar with reference to his office No. & Date cited above.
2. Deputy District Education Officer (Male) Local Office.
3. District Accounts Officer Lakki Marwat.
4. District Monitoring Officer (EMA) Lakki Marwat.
5. SDEO (Male) Concerned.
6. Principals/Head Masters Concerned.
7. AP DEMIS Local Office.
8. Teachers concerned.

*M. J. M. S.*

**District Education Officer  
(Male) Lakki Marwat**

4.

**JAVED IQBAL GULBELA**  
Advocate  
Supreme Court of Pakistan  
(ABC # 5317)

Dist. Govt. KP-Provincial  
District Accounts Office Lakki  
Monthly Salary Statement (February-2023)

(10)

(17)



Person's Information of Mr PERWEZ KAMAL KHAN d/w/s of ABDUR RAHIM KHAN

Personnel Number: 00348547

CNIC: 1120103246419

NTN:

Date of Birth: 01.01.1982

Entry into Govt. Service: 16.10.2006

Length of Service: 16 Years 04 Months 014 Days

Employment Category: Active Temporary

Designation: SECONDARY SCHOOL TEACHER

80003083-DISTRICT GOVERNMENT KHYBE

DDO Code: LK6098-H.M GHS TOP TAKHTI KHEL

Payroll Section: 001

GPF Section: 001

Cash Center: 15

GPF A/C No: 348547

GPF Interest applied

GPF Balance:

483,194.00 (provisional).

Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2022

Pay Scale Type: Civil BPS: 16

Pay Stage: 11

Wage type		Amount	Wage type		Amount
0001	Basic Pay	52,930.00	1001	House Rent Allowance 45%	4,091.00
1210	Convey Allowance 2005	5,000.00	1300	Medical Allowance	1,500.00
1505	Charge Allowance	40.00	2148	15% Adhoc Relief All-2013	553.00
2199	Adhoc Relief Allow @10%	377.00	2316	Teaching Allowance 2021	3,782.00
2341	Dispr. Red All 15% 2022KP	4,812.00	2347	Adhoc Rel Al 15% 22(PS17)	4,812.00
5002	Adjustment House Rent	896.00	5011	Adj Conveyance Allowance	3,389.00
5150	Adj. Teaching Allow 2021	882.00	5801	Adj Basic Pay	5,768.00

Deductions - General

Wage type		Amount	Wage type		Amount
3016	GPF Subscription	-3,340.00	3501	Benevolent Fund	-1,500.00
3609	Income Tax	-564.00	4004	R. Benefits & Death Comp:	-650.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
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Deductions - Income Tax

Payable: 7,250.63 Recovered till FEB-2023: 3,184.00 Exempted: 1812.19 Recoverable: 2,254.44

Gross Pay (Rs.): 88,832.00 Deductions: (Rs.): -6,054.00 Net Pay: (Rs.): 82,778.00

Payee Name: PERWEZ KAMAL KHAN

Account Number: 010-1787-8

Bank Details: UNITED BANK LIMITED, 211025 SARAI NAURANG SARAI NAURANG, LAKKI MARWAT

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: LK

Domicile: -

Housing Status: No Official

Temp. Address:

City:

Email: parvezkamal897@gmail.com

JAVED IQBAL GULBELA  
Advocate  
Supreme Court of Pakistan  
(ASC # 5317)

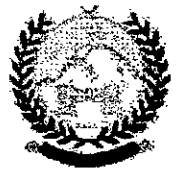
System generated document in accordance with APPM 4.6.12.9(360663/25.02.2023/v3.0)

\* All amounts are in Pak Rupees

\* Errors & omissions excepted (SERVICES/28.02.2023/20:11:47)

(18)

**Dist. Govt. KP-Provincial**  
**District Accounts Office Lakki**  
**Monthly Salary Statement (March-2023)**



**Personal Information of Mr PERWEZ KAMAL KHAN d/w/s of ABDUR RAHIM KHAN**

Personnel Number: 00348547      CNIC: 1120103246419      NTN:  
Date of Birth: 01.01.1982      Entry into Govt. Service: 16.10.2006      Length of Service: 16 Years 05 Months 017 Days

**Employment Category: Active Temporary**

Designation: SECONDARY SCHOOL TEACHER      80003083-DISTRICT GOVERNMENT KHYBE  
DDO Code: LK6098-H.M GHS TOP TAKHTI KHEL  
Payroll Section: 001      GPF Section: 001      Cash Center: 15  
GPF A/C No: 348547      GPF Interest applied      **GPF Balance:**      486,534.00 (provisional)  
Vendor Number: -  
**Pay and Allowances:**      Pay scale: BPS For - 2022      Pay Scale Type: Civil      BPS: 16      Pay Stage: 11

Wage type		Amount	Wage type		Amount
0001	Basic Pay	52,930.00	1001	House Rent Allowance 45%	4,091.00
1210	Convey Allowance 2005	5,000.00	1300	Medical Allowance	1,500.00
1505	Charge Allowance	40.00	2148	15% Adhoc Relief All-2013	553.00
2199	Adhoc Relief Allow @10%	377.00	2316	Teaching Allowance 2021	3,782.00
2341	Dispr. Red All 15% 2022KP	4,812.00	2347	Adhoc Rel Al 15% 22(PS17)	4,812.00

**Deductions - General**

Wage type		Amount	Wage type		Amount
3016	GPF Subscription	-3,340.00	3501	Benevolent Fund	-1,500.00
3609	Income Tax	-564.00	4004	R. Benefits & Death Comp:	-650.00

**Deductions - Loans and Advances**

Loan	Description	Principal amount	Deduction	Balance
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**Deductions - Income Tax**

Payable: 7,250.63      Recovered till MAR-2023: 3,748.00      Exempted: 1812.10      Recoverable: 1,690.53

**Gross Pay (Rs.): 77,897.00      Deductions: (Rs.): -6,054.00      Net Pay: (Rs.): 71,843.00**

Payee Name: PERWEZ KAMAL KHAN  
Account Number: 010-1787-8  
Bank Details: UNITED BANK LIMITED, 211025 SARAI NAURANG SARAI NAURANG, LAKKI MARWAT

**Leaves:**      Opening Balance:      Availed:      Earned:      Balance:

**Permanent Address:**

City: LK      Domicile: -      Housing Status: No Official  
Temp. Address:  
City:      Email: parvezkamal897@gmail.com

**JAVED IQBAL GULBELA**  
Advocate  
Supreme Court of Pakistan  
(ASC # 6317)

Dist. Govt. KP-Provincial  
District Accounts Office Lakki  
Monthly Salary Statement (April-2023)

12

19



Personal Information of Mr PERWEZ KAMAL KHAN d/w/s of ABDUR RAHIM KHAN

Personnel Number: 00348547

CNIC: 1120103246419

NTN:

Date of Birth: 01.01.1982

Entry into Govt. Service: 16.10.2006

Length of Service: 16 Years 06 Months 016 Days

Employment Category: Active Temporary

Designation: SECONDARY SCHOOL TEACHER

80003083-DISTRICT GOVERNMENT KHYBE

DDO Code: LK6098-H.M GHS TOP TAKHTI KHEL

Payroll Section: 001

GPF Section: 001

Cash Center: 15

GPF A/C No: 348547

GPF Interest applied

GPF Balance:

489,874.00 (provisional)

Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2022

Pay Scale Type: Civil BPS: 16

Pay Stage: 11

Wage type		Amount	Wage type		Amount
0001	Basic Pay	52,930.00	1001	House Rent Allowance 45%	4,091.00
1210	Convey Allowance 2005	5,000.00	1300	Medical Allowance	1,500.00
1505	Charge Allowance	40.00	2148	15% Adhoc Relief All-2013	553.00
2199	Adhoc Relief Allow @10%	377.00	2316	Teaching Allowance 2021	3,782.00
2341	Dispr. Red All 15% 2022KP	4,812.00	2347	Adhoc Rel Al 15% 22(PS17)	4,812.00

Deductions - General

Wage type		Amount	Wage type		Amount
3016	GPF Subscription	-3,340.00	3501	Benevolent Fund	-1,500.00
3609	Income Tax	-564.00	4004	R. Benefits & Death Comp.	-650.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
------	-------------	------------------	-----------	---------

Deductions - Income Tax

Payable: 7,250.63 Recovered till APR-2023: 4,312.00 Exempted: 1811.93 Recoverable: 1,126.70

Gross Pay (Rs.): 77,897.00 Deductions: (Rs.): -6,054.00 Net Pay: (Rs.): 71,843.00

Payee Name: PERWEZ KAMAL KHAN

Account Number: 010-1787-8

Bank Details: UNITED BANK LIMITED, 211025 SARAI NAURANG SARAI NAURANG, LAKKI MARWAT

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: LK

Domicile: -

Housing Status: No Official

Temp. Address:

City:

Email: parvezkamal897@gmail.com

JAVED IOBAL GULBELA  
Advocate  
Supreme Court Pakistan  
(ASC # 5317)

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\* All amounts are in Pak Rupees

\* Errors & omissions excepted (SERVICES/03.05.2023/21:43:40)

(21)

(20)

Amir

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) LAKKI MARWAT

OFFICE ORDER

In pursuance to the Director Elementary & Secondary Education Khyber Pakhtunkhwa Notification bearing No. 9256-60/File No.1/Promotion of SST (BPS-16)/2022 dated 15/3/2023, the promotion order in respect of Mr.Parvaiz Kamal PSHT GPS Nar Purdil Begu Khel to the post of SST (Bio-Chem) , notified vide Director E& SE notification bearing no 3997-4001 dated 1/12/2022, Item No.5 Serial No.2 , is hereby withdrawn(erroneously promoted being junior to official bearing Seniority no 417)

Consequent upon the above, the District Education Officer (M) Lakki Marwat, being competent authority, is further pleased to adjust him against the vacant post of Primary School Head Teacher (B-15) in GPS No 1 Baist Khel

- Note:
- 1.No TA/DA Is Allowed.
  - 2.Charge report should be submitted to all concerned.

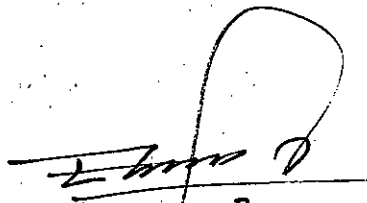
DISTRICT EDUCATION OFFICER  
(M) LAKKI MARWAT

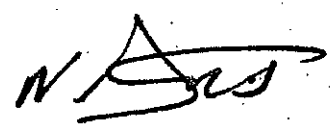
Endst: No. 2516-21,

Dated. 24/03/2023

Copy to the:

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa with ref: to his No.9256-60 dated 15-03-2022
2. District Accounts Officer Lakki Marwat.
3. District Monitoring Officer Lakki Marwat EMA Lakki Marwat.
4. Head Master GHS Top Takhti Khel to relive Mr.Parvaiz Kamal SST (B/C) immediately.
5. SDEO (M) Serai Naurang for necessary entry in his service book.
6. Teacher Concerned to assume the charge of PSHT

  
 9/c 28/3  
 2023  
 Head Master  
 G.H.S Top Takhti Khel  
 Lakki Marwat



DISTRICT EDUCATION OFFICER  
(M) LAKKI MARWAT

JAVED IQBAL GULBELA  
Advocate.  
Supreme Court of Pakistan  
(ASC # 5317)

(1)

(21)

Am-02

بخدمت جناب سیکرٹری صاحب ایلیمنٹری اینڈ سیکنڈری ایجوکیشن ڈیپارٹمنٹ صوبہ خیبر پختونخواہ پشاور

درخواست (اپیل) برائے واپسی احکامات آرڈر نمبر 60-9256 مورخہ 15 مارچ 2023

جناب عالی!

نہایت مؤدبانہ گزارش کی جاتی ہے کہ سائل مورخہ 1 دسمبر 2022 کو آرڈر نمبر 3997-4001 کے تحت PSHT سے (Bio/Chem) پر پروموٹ ہونے کے احکامات صادر ہوئے۔ جس کی روشنی میں ڈسٹرکٹ ایجوکیشن آفیسر ضلع کلی مروت نے مورخہ 12 دسمبر 2022 آرڈر نمبر 37-8230 کے تحت سائل کو گورنمنٹ ہائی سکول ٹاپ تختی نیل ضلع کلی مروت میں SST (BPS-16) Bio/Chem کے احکامات صادر فرمائے۔ سائل نے عرصہ تقریباً 4 مہینے احسن طریقے سے فرائض سرانجام دیے اور دیتا رہا۔ سائل کو بطور SST (Bio/Chem) BPS 16 تنخواہ بھی جاری ہوئی۔

جناب والا شان! سائل کو معلوم ہوا کہ آرڈر نمبر 60-9256 مورخہ 15 مارچ 2023 کو سائل کو With draw کے احکامات صادر ہوئے۔

جناب والا شان! سائل ایک ایماندار اور فرض شناس شخصیت کا مالک ہے سائل نے پورے سروس میں افسران کو کسی قسم کی کوتاہی کا موقع نہیں دیا ہے۔

لہذا بذریعہ درخواست التجا کی جاتی ہے کہ سائل کے with draw کے نوٹیفیکیشن واپس کرنے کے احکامات صادر فرمائیں۔

سائل آپ کے دامت اقبال کیلئے ہمہ وقت دعا گو رہے گا۔

شکریہ

مورخہ: 21-03-2023

العارض

پرویز کمال، ولد عبد الرحیم خان  
سکنہ نار اسپر لائی ڈاکخانہ نار مظفر خان  
تحصیل سرانے نورنگ ضلع کلی مروت

رابطہ نمبر: 03006490687

واٹس اپ نمبر: 03059138442

JAVED IQBAL GULBELA  
Advocate  
Supreme Court of Pakistan  
(ASC 5317)