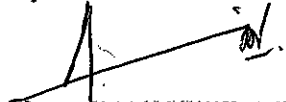


# FORM OF ORDER SHEET

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

**Appeal No. 1703/2023**

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	15/08/2023	<p>The appeal of Mr. Khaista Jan is re-submitted today by Mr. Noor Muhammad Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <u>24-08-2023</u>.</p> <p>By the order of Chairman  REGISTRAR</p>

The appeal of Mr. Khaista Jan CT, GMS Qasim Khel Orakzai received today i.e on 06.06.2023 is incomplete on the following score which is returned to the counsel for the appellants for completion and resubmission within 15 days.

- 1- Copy of departmental appeal in respect of appellants is not attached with the appeal which be placed on it.
- 2- Copy of proper rejection order of departmental appeal is not attached with the appeal which be placed on it.

No. 1651 /S.T,

Dt. 9/6 /2023.

*A. M.*

REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Noor Muhammad Khattak Adv.  
High Court Peshawar.

R/Civ,

The departmental appeal is already annexed with it at page-17. So far as the rejection appellate order is concerned, the same has been issued/written in the face of Departmental appeal which is available at Annexure-F page-17.

In light of the above, the instant appeal may kindly be placed before the Hon'ble Bench (SB) for consideration/decision.

Noor Muhammad Khattak  
ASC.

1731  

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12/6/23

No 1860 / ST  
04-07-2023

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR**

APPEAL NO. 1763 /2023

KHAISTA JAN

V/S

EDUCATION DEPTT:

**INDEX**

S. NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of appeal	.....	1-3
2.	Application for suspension	.....	4
3.	Copies of the minutes of the DPC dated 14.10.2020 and notification dated 10.12.2020	A & B	5-10
4.	Copy of the educational testimonials	C	11-13
5.	Copies of the letters	D	14-15
6.	Copy of the office order dated 19.05.2023	E	16
7.	Copy of the departmental appeal <sup>original</sup> dt 9/8/23	F	17
8.	Vakalatnama	.....	18

APPELLANT

Through:

**NOOR MOHAMMAD KHATTAK**  
ADVOCATE SUPREME COURT

-1-

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

**APPEAL NO. 1703 /2023**

Mr. Khaista Jan, CT (BPS-15),  
GMS Qasim Khel, District Orakzai.

..... **APPELLANT**

**VERSUS**

- 1- The Secretary Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director. Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 3- District Education Officer, District Orakzai.

..... **RESPONDENTS**

**APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED  
ORDER DATED 19.05.2023 WHEREBY THE PROMOTION  
ORDER DATED 10.12.2020 OF THE APPELLANT HAS BEEN  
WITHDRAWN AND AGAINST THE APPELLATE ORDER DATED  
09.08.2023 WHEREBY THE DEPARTMENTAL APPEAL OF THE  
APPELLANT HAS BEEN REGRETTEED ON NO GOOD GROUNDS.**

**PRAYER:**

**That on acceptance of this appeal the impugned order dated 19.05.2023, and the Appellate order 09.08.2023 may very kindly be set aside and the promotion order dated 10.12.2020 be restored with all back benefits. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.**

**R/SHWETH:**

**ON FACTS:**

1. That appellant was an employee of the respondent Department and performing his duty with full zeal & zest and up to the entire satisfaction of his high ups.
2. That the appellant being qualified was appointed as PST on 24.11.2009, in the respondent department and since then they are working with the full zeal and zest.
3. That it is pertinent to mention here that 60 number of posts of CT (BPS-15) were laying vacant in the District Orakzai. That a DPC was held to fill up the subject posts and amongst these posts 36 number of posts were allocated to the quota of PST/PSHT/SPST. That a DPC meeting was held on 14.10.2020 wherein the appellant was recommended for the post of CT (BPS-15) and vide notification

dated 10.12.2020 the appellant was promoted to the post of CT (BPS-15). Copies of the minutes of the DPC dated 14.10.2020 and notification dated 10.12.2020 are attached as annexure .....A&B.

4. That the appellant is a highly qualified person and his field. Copy of the educational testimonials are attached as annexure .....C.
5. That in pursuance to the notification the appellant started performing his duties with devotion and up to the entire satisfaction of his superiors.
6. That vide letter dated 11.04.2023 the respondent No. 3 was asked to withdraw the promotion order dated 10.12.2020, in response to which the respondent No. 3 vide letter dated 09.05.2023 requested the respondent No. 2 for the review of the decision. Copies of the letters are attached as annexure .....D.
7. That astonishingly vide impugned office order dated 19.05.2023 the promotion order dated 10.12.2020 of the appellant was withdrawn in utter violation of the law and rules on the subject. Copy of the office order dated 19.05.2023 is attached as annexure .....E.
8. That the appellant feeling aggrieved from the impugned office order dated 19.05.2023 preferred departmental appeal. Copy of the departmental appeal is attached as annexure .....F.
9. That the departmental appeal was rejected vide appellate order dated 09.08.2023 as note on the departmental appeal with no good reasons.
10. That having no other remedy preferred the instant appeal on the following grounds amongst the others.

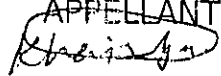
**GROUND:**

- A- That the impugned order dated 19.05.2019 and appellate order dated 09.08.2023 issued by the respondents are against the law, facts, norms of natural justice and materials on the record hence not tenable in the eyes of law.
- B- That the appellant has not been treated in accordance with law and Rules by the respondents on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That no show cause notice has been served upon the appellant before the issuance of the impugned orders.
- D- That no right of defense has been provided to the appellant hence he has been condemned unheard thus violated Article-10-A of the constitution of the Islamic Republic of Pakistan, 1973.

- E- That under the principle of *Locus Poenitentiae* the respondents are duty bound not to withdraw the promotion order.
- F- That no regular inquiry has been conducted in to the matter before the issuance of the impugned orders.
- G- That the respondents acted in arbitrary and malafide manner by issuing the impugned orders.
- H- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

Dated: 31-05-2023

APPELLANT  
  
KHAISTA JAN


Through:

NOOR MOHAMMAD KHATTAK  
ADVOCATE SUPREME COURT

  
KAMRAN KHAN

  
UMAR FAROOQ

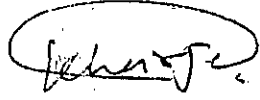
  
MUHAMMAD AYUB

  
WALEED ADNAN

  
MAHMOOD JAN  
Advocates, Peshawar

**AFFIDAVIT**

I, Khaista Jan, CT (BPS-15), GMS Qasim Khel,, District Orakzai, do hereby solemnly affirm and declare on Oath that the contents of this Service Appeal are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Tribunal.



DEPONENT

-4-

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

C.M. NO. \_\_\_\_\_/2023

IN

APPEAL NO. \_\_\_\_\_/2023

**KHAISTA JAN**

**VS**

**EDUCATION DEPT.**

**APPLICATION FOR SUSPENSION OF THE OPERATION OF THE**  
**ORDER DATED 19.05.2023 TILL THE DISPOSAL OF THE**  
**MENTIONED APPEAL.**

**R.SHEWETH:**

1. That, the titled appeal is submitted before this Honorable tribunal along with this application in which no date has been fixed yet.
2. That the applicant had filed the titled appeal against order dated 19.05.2023 whereby his promotion from PST to CT notification has been withdrawn.
3. That, all the three ingredients required for grant of stay are in favor of the appellant.
4. That the contents of the appeal may be kindly be considered as part and parcel of the instant application.
5. That, any other ground would be taken at the time of arguments with prior permission of this Honorable Tribunal.

It is therefore, most humbly prayed that on acceptance of this application the impugned order dated 19.05.2023 may very kindly be suspended till the disposal of the instant service appeal.

APPELLANT

THROUGH:

M  
Q  
**NOOR MUHAMMAD KHATTAK**  
ADVOCATE SUPREME COURT



District Education Office  
District Orakzai

No.

35/4

Phone: 0925-690017 FAX: 0925-690017

Date

24

10/2020

MINUTES OF THE MEETING OF DEPARTMENTAL PROMOTION COMMITTEE HELD ON 14-10-2020 AT 10:30 AM

A meeting of the Departmental Promotion Committee was held today on 14-10-2020 at 10:00 AM under the Chairmanship of District Education Officer District Orakzai to discuss the promotion cases of Male, PST/SPST/PSHT to CT B-15, in the District Education Office Orakzai. The following attended the meeting:

- |  |                          |
|--|--------------------------|
| 1. Mr. Fareed Ullah Mehsud, District Education Officer         | Chairman                 |
| 2. Mr. Hameed Ulhan Jan, Additional Director NMD               | (KPE&SPD Representative) |
| 3. Mr. Saif Ullah, Principal B-19 GHS Mandati District Orakzai | Member                   |
| 4. Mr. Muhammad Iqbal, HM GHS Mishli Bazar                     | Member                   |
| 5. Kausar Ali, ADEO District Orakzai                           | Member                   |
| 6. Mr. Abdul Malik, ADEO District Orakzai                      | Member                   |
| 7. Mst. Nabila Naz, ADEO District Orakzai                      | Member                   |
| 8. Mr. Shakeel Ahmed, SST GHS Swaro Kot                        | Member                   |
| 9. Mr. Wahid Ullah, SCT GMS Bagara Mishli                      | Member                   |

The meeting started with recitation from the Holy Quran. The Chair welcomed the participants. The following items were discussed in detail by the DPC keeping in view all the aspects of the case and finally unanimously recommended the promotion of the following teachers on the vacant post with immediate effect.

Item No. 1 PROMOTION OF PST/SPST/PSHT (MALE) FROM TO CT BPS-15 ON REGULAR BASIS

The case of promotion of PST/SPST/PSHT (MALE) to CT BPS-15 against vacant posts was considered and the DPC recommended as under:

Total No. of CT (M) Vacant Post	60
60 % share of PST/SPST/PSHT Posts	36
Share of promotion 100%	36
Net to be Promoted	36
Available for promotion	36
Recommended for promotion to CT	36



S. #	S.L. #	Name of teacher	RP S.	Date of Birth	Regular Service	Place of Posting	Remarks
1	36	Zeeun Ali	15	05/02/1970	01/03/1993	GPS Noor Ali Garhi	
2	66	Amul Hassan	15	01/08/1970	23/05/1995	GPS Garhi Mani Khel	
3	126	Hassanullah	15	13/02/1972	31/03/2001	GPS Khawas Khel	
4	150	Ali Mujan	15	05/03/1979	01/09/2003	GPS Sarka Aakhel	
5	160	Yasir Ullah	15	02/01/1980	01/09/2003	GPS Sarla Mishal	
6	161	Munawar Shah	15	10/03/1982	01/10/2003	GPS Sarki Khel	
7	166	Abdul Shakaor	15	01/03/1972	23/10/2003	GPS Sama Mamozai	
8	169	Samar Gul	15	01/01/1979	29/07/2004	GPS Sangra	
9	170	Khalid ur Rehman	15	03/06/1979	03/08/2004	GPS Taropi Ali Khel	
10	178	Muhammad Umer	15	22/04/1976	03/09/2005	GPS Rambic Salai	
11	218	Mir Asghar	15	16/10/1984	05/09/2005	GPS Khaigar Boor	
12	219	Wahed Ullah	15	02/02/1979	23/10/2005	GPS Diland Khel No.2	
13	277	Iqbal Hussain	12	03/03/1985	24/11/2009	GPS Srer Sam	
14	278	Khalida Jan Muhammad	12	01/03/1986	24/11/2009	GPS Mir Kalan Khel	
15	279	Yaqub Muhammad	12	09/03/1987	24/11/2009	GPS Malang garhi	
16	280	Hamid Naveeb	12	21/12/1982	24/11/2009	GPS Bada Sheikhan	
17	282	Rehman	12	05/10/1983	24/11/2009	GPS Gul Cheri	
18	283	Gul Karim	12	15/01/1982	03/12/2009	GPS Bilazawi	
19	284	Dalil Shah	12	04/04/1980	24/11/2009	GPS Bared Khel	
20	285	Munir Rehman	12	20/05/1984	24/11/2009	GPS Jahn Kado	
21	287	Gul Batool	12	05/01/1979	24/11/2009	GPS Karapa Samana	
22	288	Ashfaq Ali	12	18/05/1985	24/11/2009	GPS Khar Khushan	
23	289	Masroor Khan S. Khatun	12	10/04/1984	02/12/2009	GPS Toor Kant	
24	291	Hussain	12	05/05/1985	24/11/2009	GPS Shamer	
25	301	Rozay War	12	15/02/1982	24/11/2009	GPS Zakhum	
26	304	Rehan Muhammad	12	10/02/1981	24/11/2009	GPS Palaosi	
27	305	Khan	12	10/05/1986	24/11/2009	GPS Hijawar	
28	308	Shaim Hassan	12	09/10/1987	24/11/2009	GPS And Khel Bala	
29	300	Amjad Khan	12	18/02/1985	25/11/2009	GPS Beropi Ali Khel	
30	302	Sajid Ullah	12	20/01/1986	24/11/2009	GPS Panjam Ali Khel	

3-6-

303	Amrur Rahman	12	03/10/1982	24/11/2009	GPS Khadizal No.1
304	Hikmat Khan Munawar	12	02/10/1983	24/11/2009	GPS Swara Kot
306	Khan Muhammad	12	25/10/1982	24/11/2009	GPS Chappar Mishil
307	Ghani	12	26/02/1985	24/11/2009	GPS Kori Ali Khel
308	Panda Khan	12	13/04/1984	25/11/2009	GPS Yusuf Khel
312	Ismail Khan	12	12/05/1986	24/11/2009	GPS Khadizal No.2

No. of PST/SPST/PSHT (Male) to CT cleared for promotion = 36

No. of CT (male) deferred for promotion = NIL

The meeting ended with a vote of thanks to and from the chair.

1. Wahid Ullah  
SCT GMS Bagara Mishil  
Member

2. Shakeel Ahmad  
SST GMS Swara Kot  
Member

3. Mr. Abdul Malik  
ADEO Orakzai  
Member

4. Kausar Ali  
ADEO Orakzai  
Member

5. Mrs. Nabila Naz  
ADEO Orakzai  
Member

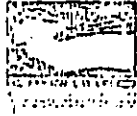
6. Muhammad Iqbal (HM)  
GHS Mishil Bazar  
Member

7. Mr. Rais Khan  
ADEO Orakzai  
Member

8. Saif Ullah Principal  
GHS Mandall  
Member

9. Hameed Ullah Jan  
Additional Director NMD  
KP ESSED Representative

Mr. Farhad Ullah Munsud  
District Education Officer Orakzai  
(Chairman)



District Education Office  
District Orakzai

4B  
No. 666-9-8  
Date 12/12/2020

Phone 0925-690317 FAX 0925-690317

Notification:

As recommended by the Departmental Promotion Committee during its meeting held on 14/10/2020, vide Minutes No. 3514, the competent authority has been pleased to promote & adjust the following male PST/SPST/PSHT teachers from PST/SPST/PSHT to CT-Post BPS-15 against the vacant post in various schools mentioned against their names in district Orakzai with immediate effect in the interest of public service.

S#	S.L#	Name of teacher	BPS	Date of Birth	Regular Service	Current School	Name of the School where Posted
1	36	Zaenal All	15	05/02/1970	01/03/1993	GPS Noor Ali Garhi	GMS Mirzai
2	65	Amal Hassan	15	01/08/1970	23/05/1995	GPS Garhi Mani Khel	GHS Kalaya
3	126	Hassanullah	15	13/02/1972	31/03/2001	GPS Khawas Khel	GMS Akwarha Mera
4	152	Ah Majan	15	05/03/1979	01/09/2003	GPS Sarka Aakhe	GPS Tooli Bagh, Orakzai
5	160	Yasin Ullah	15	02/01/1980	01/09/2003	GPS Sarla Mishli	GMS Mishli Bazar
6	161	Munawar Shah	15	10/03/1982	01/10/2003	GPS Sarki Khel	GPS Inzer Palli
7	166	Abdul Shakaar	15	01/03/1972	23/10/2003	GPS Sama Mamozai	GHS Dran Sheikhhan
8	169	Samar Gul	15	01/01/1979	29/07/2004	GPS Sangra	GMS Mishli Bazar
9	170	Khallur Rehman	15	05/06/1979	03/08/2004	GPS Tarapi All Khel	GMS Sarki Khel
10	178	Muhammad Umer	15	22/04/1976	03/09/2005	GPS Rambic Salai	GMS Gulistan
11	218	Mir Asghar Jahanad	15	16/10/1984	05/09/2005	GPS Khangar Bazar	GMS Sarki Khel
12	219	Ghah	15	02/02/1979	23/10/2005	GPS Biland Khel No.2	GMS Biland Khel
13	277	Arif Hussain	12	05/05/1995	24/11/2009	GPS Star Sam	GMS Star Sam
14	278	Khaisla Jan	12	01/03/1986	24/11/2009	GPS Mir Kalam Khel	GMS Casim Khel, Orakzai
15	279	Muhammad Yaqoob	12	09/03/1987	24/11/2009	GPS Malang Garhi	GMS Yakhlo Kandow
16	289	Muhammad Hanif	12	21/12/1982	24/11/2009	GPS Bada Sheikhhan	GMS Mishli Bazar
17	282	Maseeb Rehman	12	05/10/1985	21/11/2009	GPS Gul Cheri	GMS Babera Laki
18	283	Gul Karim	12	15/01/1982	03/12/2009	GPS Bilazawi Khel	GMS Safi Feroz Khel
19	284	Dalir Shah	12	04/04/1980	24/11/2009	GPS Bazed Khel	GMS Mir Mehtab Sheikhhan

*(Signature)*  
District Education Officer  
Orakzai District at Hangu

9-

Regulation Post Fee

20	285	Yash Ur Pehman	12	20/05/1984	24/11/2009	GPS Joba Kadar	GHS Avi Meia
21	287	Gul Rahim	12	05/04/1979	24/11/2009	GPS Karapa Samana	GHS Gulistan
22	288	Ashfaq Ali	12	18/03/1985	24/11/2009	GPS Khar Khushla	GMS Khalil Japoy (Khura)
23	289	Maskeen Khan	12	10/04/1984	02/12/2009	GPS Taar Ken	GMS Damber Lasi
24	290	S.Khadim Hussain	12	03/05/1985	24/11/2009	GPS Shamer	GHS And Khel
25	291	Saeed Akbar	12	16/02/1982	24/11/2009	GPS Zaindar	GHS Dron Meikhan
26	293	Hussain Anghar	12	10/02/1981	24/11/2009	GPS Paloo	GMS Khalil Japoy
27	295	Minawar Khan	12	10/05/1986	24/11/2009	GPS Injwar	GHS Saifal Zaro
28	298	Muhammad Hassan	12	09/10/1987	24/11/2009	GPS And Khe Bala	GMS Zaro
29	300	Arjad Khan	12	18/02/1985	25/11/2009	GPS Iluapl Ali Khel	GMS Zanku Khel
30	302	Saib Ullah Khan	12	20/04/1986	24/11/2009	GPS Panjam Ali Khel	GMS Alwarha Meia
31	303	Arif ur Pehman	12	03/10/1982	24/11/2009	GPS Khadzal No.1	GHS Swaro Kol
32	304	Hikmat Khan	12	02/10/1983	24/11/2009	GPS Sawara Kol	GHS Swaro Kol
33	306	Minawar Khan	12	25/10/1982	24/11/2009	GPS Chapper Mishli	GMS Babera Laki
34	307	Muhammad Ghani	12	26/02/1985	24/11/2009	GPS Kol Ali Khel	GMS Damber Lasi
35	308	Painda Khan	12	13/04/1984	25/11/2009	GPS Yusuf Khel	GHS Bagh Nak
36	312	Israfil Khan	12	12/05/1986	24/11/2009	GPS Khadzal No.2	GMS Dana Khula

**Terms & Conditions:**

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

**DISTRICT EDUCATION OFFICER  
DISTRICT ORAKZAI**

Endst No. 6661-69 dated: 10/12/2020

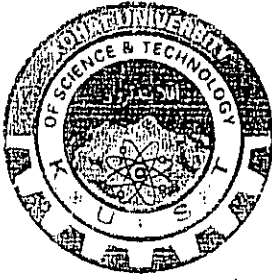
Copy forwarded for information and necessary action to the:

1. Director Education (E&SE) Khyber Pakhtunkhwa Peshawar.

-10-

2. Deputy Commissioner, Orakzai.
3. District Monitoring Officer, Orakzai.
4. District Account Officer District Orakzai.
5. PS to the Secretary to Govt Khyber Pakhtunkhwa E& SE Department, Peshawar.
6. PA to the Director (E&SE) Khyber Pakhtunkhwa Peshawar.
7. Accountant Local Office, Orakzai.
8. Teacher concerned.
9. Master File

~~DISTRICT EDUCATION OFFICER~~  
DISTRICT ORAKZAI



(14)

C" -11-

Serial No. 0386

# Kohat University

of Science & Technology, Kohat (Pakistan)

## DETAILED MARKS CERTIFICATE

*Bachelor of Arts (B.A) Part II Annual  
Examination, 2008*

Name: Khaista Jan Roll No. 13611  
Father's Name: Akbar Jan Registration No. 2007-PCKU-1665

*Certified that the candidate secured the following marks and is placed in 2nd Division*

S U B J E C T S	Maximum Marks	M A R K S O B T A I N E D	
		In Figure	In Words
English Compulsory	75	30	Thirty
Islamic Studies	75	46	Forty Six
Pashto	75	31	Thirty One
Pak Studies	40	18	Eighteen
<i>Part-I Marks</i>	285	139	One Hundred Thirty Nine
Total	550	264	Two Hundred Sixty Four


The examination was taken as a whole

To Pass 40% Marks in each Subject (Written & Practical Separately) & 45% Marks In Aggregate

Result declared on 20-Oct-08

148

Errors and omissions are subject to  
subsequent rectification

  
CONTROLLER OF EXAMINATION  
Kohat University of Science and Techno  
Kohat, Pakistan.

-12-

Allama Iqbal Open University  
Islamabad



Serial No. 114274

Certified that *Mr/Ms* KHAISTA JAN  
*Son/Daughter of* AKBAR JAN  
*Registration No.* 06-AOI-00233 *Roll No* AS651006  
*Semester* AUTUMN 2013 *having met all the requirements under*  
*the semester system is this day awarded the*

## Certificate of Teaching

*He/She has secured* 68 % *marks*  
*and placed in.* B *grade*



Result declared on: July 03, 2014

Date of issue: January 13, 2015

*M. Iqbal*  
Controller of Examinations

Note: This certificate is issued without alteration/erasure.  
The detail of courses is overleaf.

Serial No. 13611  
Roll No.

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

2007-PORL-1665

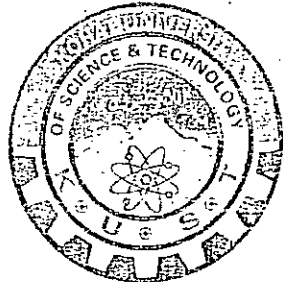
# Kohat University of Science & Technology, Kohat (Pakistan)

Session ANNUAL 2008

*13-*  
KHAISTA JAN SON of AKBAR JAN and a student  
of GRAKZAI AGENCY having passed the prescribed  
examination held in JULY 2008, is this day admitted by

The Kohat University of Science & Technology, Kohat  
to the Degree of  
**Bachelor of Arts**  
in the SECOND Division

The Examination was taken as a whole/imparts



*Atta's Tech*  
*U.S.T.*  
D. [Signature]  
General Office  
KCHU  
KCHAT.

Controller of Examinations

Countersigned

Vice Chancellor

Result declared on 20TH OCTOBER 2008





"D" -14-

DIRECTORATE OF ELEMENTARY &  
SECONDARY EDUCATION KHYBER  
PAKHTUNKHWA PESHAWAR  
F.NO.61/GENERAL TRANSFER

NO. 18811 DATED 11/04/2023

To

The District Education Officer,  
Orakzai at Hangu.

Subject: - INTER DISTRICT TRANSFER FROM DISTRICT ORAKZAI  
TO DISTRICT HANGU

I am directed to refer to this Office letter No. 14585 Dated 11-01-2023, on the subject cited above and to state that from the perusal of the Promotion Order, Mr. Israfeel Khan S/O Gul Zari Shah PS (BS-12) including 23 others were promoted to the post of CT (BS-15) vide No. 6661-69 Dated 10-12-2020, which is clear cut violation of Service Rules, 2012.

In this regard; I am further directed to ask you to withdraw the Promotion Order of the mentioned CT, including 23 others earlier notified vide Dated 10-12-2020, as well as <sup>all</sup> such like cases, if any, and compliance report may be shared with this Office, please.

11/04/2023  
Assistant Director (Estab)  
Elementary and Secondary Education  
Khyber Pakhtunkhwa

Encl: No. \_\_\_\_\_

Copy of the above is forwarded to the

1. PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa.

Assistant Director (Estab)  
Elementary and Secondary Education  
Khyber Pakhtunkhwa

*Wazirullah*

*ADP*  
*26/5/23*



-15-

**OFFICE OF THE DISTRICT EDUCATION OFFICER-(M) ORAKZAI**  
**DISTRICT HEADQUARTER ORAKZAI AT BABER MELA HANGU**  
Phone # :0925-690017 Fax # 0925-690017  
Email: deoorakzal2020@gmail.com



No. 1344 Dated 08/05/2023

To, Director,  
Elementary & Secondary Education,  
Khyber Pakhtunkhwa, Peshawar.

Subject: - REQUEST FOR REVIEW/APPRaisal

Reference to the Assistant Director (Estab), Elementary & Secondary Education, Khyber Pakhtunkhwa office letter bearing No. 18811, dated 11/04/2023 wherein it has been directed to withdraw the promotion order of twenty four/24 PSTs BPS: 12 to CT BPS: 16 in District Orakzai issued vide Notification of this office bearing No. 6660, dated 10-12-2020 to the extent of Serial no 13 to 36, twenty four/24 in counting.

Foregoing in view of the above, the aforesaid twenty four/24 PSTs in BPS: 12 have been promoted to the post of CT BPS: 15 in District Orakzai by adhering the following criteria.

- 1) WHEREAS, the promoted PSTs have been appointed on 24/09/2009 as PST BPS: 12, hence having 11 years of continuous Govt. regular services during promotion in 2020.
- 2) WHEREAS, there are no sanctioned posts of SPST BPS: 14 for promotion of these PSTs.
- 3) WHEREAS, in case of availability of the sanctioned posts of SPST in BPS: 14 these promoted PSTs would have been eligible for promotion to the posts of SPST BPS: 14 prior to this promotion way back in 2014 as per service rules 2012.
- 4) WHEREAS, there was no other eligible willing senior candidate than the promoted PSTs for promotion to the posts of CT BPS-15.
- 5) WHEREAS, 60 posts of CT in BPS: 15 (Male) in district Orakzai were lying vacant at the time of DPC in 2020 and those PSTs in BPS: 12 have been promoted under Service Rules 2012 the 60% share of SPS/PSHT to the posts of CT in BPS: 15.
- 6) WHEREAS, the promoted PSTs had already been served on the posts of CTs in BPS: 15 since 11/12/2020 and one of the promoted PST (Mr. Saqib ul Islam) has already obtained the inter district transfer/NOC and serving in District Kohat on the post of CT in BPS: 15.

In the light of above, letter issued by your esteemed office dated 11/04/2023 may be reviewed in the interest of public service and to avoid any litigation, please.

DISTRICT EDUCATION OFFICER-(M)

Copy of Even No. & Date:

Copy forwarded for information and necessary action to the:-

1. Deputy Commissioner, Orakzai.
2. Additional Director (Estab), Directorate of E&SE, MAs, Khyber Pakhtunkhwa, Peshawar.
3. Assistant Director (Estab), Directorate of E&SE, Khyber Pakhtunkhwa w.r.t his office letter vide cited above.
4. Office Copy.

DISTRICT EDUCATION OFFICER-(M)



7E - 16 -

**OFFICE OF THE DISTRICT EDUCATION OFFICER (M)-O ORAKZAI**  
**DISTRICT HEADQUARTER ORAKZAI AT BABER MELA-HA-GU**  
 Phone: # 0925-690017 Fax: # 0925-690017  
 Email: [degoarakzai2020@gmail.com](mailto:degoarakzai2020@gmail.com)



No. 411 Dated: 19/05/2023

**OFFICE ORDER:**

In compliance of the Directorate of Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar vide letter bearing No. 18811, dated 11-04-2023, the competent authority DEC (M) Orakzai is pleased to withdraw the promotion orders bearing Endst. No. 6660, dated 10-12-2020 in respect of the following twenty four promoted PSTs in BPS: 12 to the posts of CTs in BPS: 15 in District Orakza of the promotion order held. Furthermore, the following teachers are hereby adjusted in the schools mentioned against their names with immediate effect.

S#	NAME	CURRENT PLACE OF POSTING	PLACE OF ADJUSTMENT
1.	Iqbal Hussain	GMS Sitar Sam	GPS Dafa Mela
2.	Khalifa Jan	GMS Saif Feroz Khel	GPS Sitar Mela
3.	Muhammad Yaqoob	GMS Yakho Kandori	GPS Sarti Khel
4.	Muhammad Hanif	GMS Misha Bazar	GPS Boda Chalkha
5.	Masceeb Rehman	GMS Batra Lanki	GPS Gul Chit
6.	Gul Karim	GMS Saif Feroz Khel	GPS Ghulak Ali Khel
7.	Dalil Shah	GMS Bazki Khel	GPS Rangla Khel
8.	Malik Ur Rehman	GMS Aw Mela	GPS Dago Takhial
9.	Gul Rahim	GMS Gulistan	GPS Khoo Kauda M.
10.	Ashfaq Ali	GMS Khairi Sepoy	GPS Bal Kot
11.	Maskeen Khan	GMS Damber Lasti	GPS Oran Sitar Khel
12.	Syed Khadir Hussain	GHSS Andkhal	GHPS Sitar
13.	Ravos Akbar	GMS Wamawan	GPS Kagayeh Khel
14.	Hussain Asghar	GMS Khairi Sepoy	GPS Khar Kishla
15.	Munawar Khan	GMS Saif Darrah	GPS Arkhial
16.	Shuren Hassan	GMS Mirako Payan	GPS Sitaran Khel
17.	Arif Khan	GMS Zanka Khel	GPS Taghral
18.	Saadi Ull Islam	GMS Jarra District Kohat	Will be adjusted as and when the inter district transfer is withdrawn by the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa
19.	Amir ur Rehman	GMS Swara Kot	GPS Swara Kot
20.	Hikmat Khan	GMS Swara Kot	GPS Khairi No.1
21.	Munawar Khan	GMS Chapper Mishi	GPS Zar Chappi
22.	Muhammad Ghani	GMS Sitar Mela	Kot Ali Khel
23.	Parvina Khan	GMS Baghmal	Ghulak Ali Khel
24.	Israfil Khan	GMS Dana Khula	GPS Tarapali Khel

**Note:**

- 1) Fresh charge report in their original Basic Pay Scales as on 09-12-2020 should be submitted to all concerned within 15 days positively. In case of failure/refusal, they will be treated under the Khyber Pakhtunkhwa Govt. Servants (Efficiency & Discipline) Rules, 2011.
- 2) TADA is not allowed for joining of their duties.

DISTRICT EDUCATION OFFICER (MALE)  
 DISTRICT ORAKZAI

**Copy of Even No. & Date:**

Copy forwarded for information and necessary action to the:-

- 1) Director Elementary and secondary Education Khyber Pakhtunkhwa Peshawar with the request to withdraw inter district transfer order in file SW 18, already transferred to District Kohat vide Directorate of E&SE KP No. 13822-817/No.51 Transfers Dated Peshawar the 27/12/2022.
- 2) Additional Director (Establish), Directorate of E&SE, MA, Peshawar.
- 3) District Education Officer (M), District Kohat.
- 4) District Monitoring Officer, E&A, District Orakzai.
- 5) District Accounts Officer, District Orakzai.
- 6) Deputy DEO (M), Orakzai.
- 7) Assistant Director (Establish), Directorate of E&SE, KP, Peshawar vide his office letter quoted above.
- 8) Principal/Head Master/Incharge HIA and Head Teachers concerned.
- 9) DEOs concerned for further necessary action.
- 10) Superintendent Pay Clerk C/O the DEO (M) Orakzai for further necessary action.
- 11) District Education Officer (M) Orakzai for further necessary action.
- 12) District Education Officer (M) Orakzai for further necessary action.
- 13) Office Copy.

DISTRICT EDUCATION OFFICER (MALE)  
 DISTRICT ORAKZAI

خدمت عذاب ڈسٹرکٹ ایجوکیشن آفیسر ضلع اور کسٹوڈی

عذاب عالی

۹۴-۱۷

۱۱/۱۱/۲۰۲۳

عنوان - نظر ثانی اسکول پرائے ڈیگریڈیشن آرڈر

گزارش بحور البور یہ ہے کہ ہزار آرڈر بطور PST (2009/11/23) کو

ہوا تھا۔ گیارہ سال بعد ان PST اساتذہ کو 10-12-2020 DPC میں CT میں

پروموشن دیا گیا۔ چونکہ فائنا میں SPST (14 سکین) کا کوئی پوسٹ نہیں ہے۔

یہ اساتذہ PSHT (15 سکین) کے بھی حقدار تھے۔ چونکہ فائنا میں CT سبھی اساتذہ

زیادہ حالی تھیں۔ PSHT (15 سکین) نہ ہوئے پیران اساتذہ کو CT پر پروموشن

دیا گیا۔ چونکہ CT to PST کا 60% کوٹہ ہے

عذاب والد - اب ڈسٹرکٹ سکول CT پر گزارنے کے بعد ان اساتذہ کو CT (15 سکین) سے دوبارہ

PST (12 سکین) پر ڈیگریڈ کیا گیا۔

لہذا اب اساتذہ کی شان ادرس میں گزارش کیجاتی ہے۔ کہ اس ڈیگریڈ آرڈر

پر نظر ثانی کر کے سائٹین کو الصاف رہ کر شکور فرمائیں۔

میں نوازش ہوگی۔ مورخہ 20/05/2023

copy to

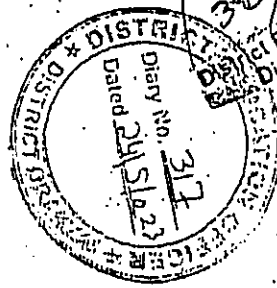
1 - ڈی سی اور کسٹوڈی

2 - ڈی ای او اور کسٹوڈی

3 - ڈائریکٹر آف ایلیمینٹری اینڈ

سکنڈری ایجوکیشن

4 - سیکرٹری ایجوکیشن کے پی کے



Office of the District Education Officer  
District Office  
DPC-2020  
PST to CT  
All teachers

317

Jamali

Saeed

اسرار خان (14)

ثاقب الاسلام (1)

Khanajee

M. Mulk

فانسان (15)

منور خان (2)

H...

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عبد (16)

احمد خان (3)

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A...

منور خان (17)

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محمد خان (18)

اقبال مین (5)

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اشفاق علی (6)

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عبد (19)

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شیرین (10)

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مطوع الرحمان (23)

محمد (11)

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اصغر خان (12)

P... لائزہ خان (13)

-17/B-

'F/1'



SECONDARY EDUCATION KHYBER  
PAKHTUNKHWA PESHAWAR  
F.NO. 61/DISTRICT CADRE TRANSFERS  
NO. 22904 DATED 09-08/2023

To  
The District Education Officer (Male),  
Orakzai at Hangu

Subject: - **APPEAL FOR RESOTRATION OF PROMOTION ORDER.**

I am directed to refer to the subject cited above and to state that the Appellant Authority is pleased to reject the appeal in respect of Mr Naseeb Ur Rehman Ex CT, and 23 others, promoted from the post of PSTs (BS-12) to the post of CTs (BS-15), against the existing rules/policy.

In this regard, I am further directed to ask you to inform the appellants accordingly, please.

*11/9/2023*  
Assistant Director (Estab)  
Elementary and Secondary Education  
Khyber Pakhtunkhwa

Endst: No. \_\_\_\_\_ /F.No.37

Copy of the above is forwarded to the:-

1. PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.

Assistant Director (Estab)  
Elementary and Secondary Education  
Khyber Pakhtunkhwa

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

Appel No          /2023

Khaisa Jan (APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

**VERSUS**

Federation Dept (RESPONDENT)  
(DEFENDANT)

I/We Appelant

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

Dated.          /          /2023

**CLIENT** Khaisa Jan

**ACCEPTED**

**NOOR MOHAMMAD KHATTAK  
ADVOCATE SUPREME COURT**

Waleed Adnan  
**WALEED ADNAN**

Kamran Khan  
**KAMRAN KHAN**

Umar Farooq Mohmand  
**UMAR FAROOQ MOHMAND**

Muhammad Ayub  
**MUHAMMAD AYUB**

**&**

Mahmood Jan  
**MAHMOOD JAN  
ADVOCATES**

**OFFICE:**  
Flat No. (TF) 291-292 3<sup>rd</sup> Floor,  
Deans Trade Centre, Peshawar Cantt.  
(0311-9314232)