


FORM OF ORDER SHEET

Court of _____

Appeal No. 1702/2023


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. Mati ur Rehman 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. Mati ur Rehman @ GHS Avi Meta Orakzai received today i.e on 06.06.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copy of departmental appeal in respect of appellant 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. 1637 /S.T,

Dt. 9/6 /2023.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Noor Muhammad Khattak Adv.
High Court Peshawar.

R/Sir,

The Departmental appeal is already annexed with i.e at page No: 16. 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 A Page 17.

In light of the above the instant appeal may kindly be placed before the Honorable Bench (SB) for Consideration/decision.

Noor Muhammad
Khattak Adv

17/31
12/6/23

No 1860 / ST
04-07-2023

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 1702 /2023

MATI UR REHMAN

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	F	17
8.	Vakalatnama	18

APPELLANT

Through:

NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT

-1-

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL NO. 1702 /2023

Mr. Mati ur Rehman, CT (BPS-15),
GHS Avi Meta, 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 annexureA&B.

4. That the appellant is a highly qualified person and his field. Copy of the educational testimonials are attached as annexureC.
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 annexureD.
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 annexureE.
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 annexureF.
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


MATI UR REHMAN

Through:


NOOR MOHAMMAD KHATTAK


KAMRAN KHAN


UMAR FAROOQ


MUHAMMAD AYUB


WALEED ADNAN


MAHMOOD JAN

Advocates, Peshawar

AFFIDAVIT

I, Mati ur Rehman, CT (BPS-15), GHS Avi Meta, 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

MATI UR REHMAN

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:

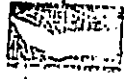
1. That, the titled appeal is submitted before this Honorable tribunal along with this application in which no date has been fixed yet.
2. That the applicant had filed the titled appeal against order dated 19.05.2023 whereby his promotion from PST to CT notification has been withdrawn.
3. That, all the 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:

y
NOOR MUHAMMAD KHATTAK
ADVOCATE SUPREME COURTE



District Education Office
District Orakzai

No. 3514

Phone (025-690017) FAX (025-690017)

Date 14/10/2020

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 Ullhan Jan, Additional Director NMD | (KPE&SED Representative) |
| 3. Mr. Salf Ullah, Principal B-19 GHS Mandall 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.No	S.I	Name of teacher	BP S	Date Birth	Regular Service	Place of Posting	Remarks
1	36	Zunar Ali	15	03/03/1970	01/03/1993	GPS Noor Ali Garhi	
2	66	Amal 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	159	Ali Majan	15	03/03/1979	01/09/2003	GPS Sarko Aokhel	
5	160	Yasin Ullah	15	02/01/1980	01/09/2003	GPS Sarla Mishli	
6	161	Munawar Shah	15	10/05/1982	01/10/2003	GPS Sarki Khel	
7	166	Abdul Shakoar	15	01/03/1972	23/10/2003	GPS Sama Mamozai	
8	169	Samar Gul Khalil ur Rehman	15	01/01/1979	29/07/2004	GPS Sangra	
9	170	Ahmad Ali	15	05/06/1979	03/08/2004	GPS Tarapi Ali Khel	
10	178	Muhammad Umar	15	22/04/1976	03/09/2005	GPS Rambic Salal	
11	218	Mr Asghar	15	16/10/1984	05/09/2005	GPS Khangar Daar	
12	219	Waheed Ullah	15	02/02/1979	23/10/2005	GPS Biland Khel No.3	
13	277	Iqbal Hussain	12	05/05/1985	24/11/2009	GPS Srer Sam	
14	278	Khairat Jan Muhammad Yaqub	12	01/03/1986	24/11/2009	GPS Mir Kalan Khel	
15	279	Muhammad Hanif	12	02/05/1987	24/11/2009	GPS Malana garhi	
16	280	Naveeb Rehman	12	21-12-1982	24/11/2009	GPS Banda Sheikhan	
17	282	Gul Karim	12	05/10/1985	24/11/2009	GPS Gul Chhri	
18	283	Dahl Shah	12	15/01/1982	05/12/2009	GPS Bilazawi	
19	284	Mam Ur Rehman	12	04/04/1980	24/11/2009	GPS Baced Khel	
20	285	Gul Rahim	12	20/05/1984	24/11/2009	GPS Jaha Kada	
21	287	Aslana Bi	12	05/04/1979	24/11/2009	GPS Karapa Samana	
22	288	Muskan Khan	12	18-05-1985	24/11/2009	GPS Khar Khushia	
23	289	S. S. Khan	12	10/04/1984	02/12/2009	GPS Taur Kani	
24	291	Hussain	12	03/05/1985	24/11/2009	GPS Shamer	
25	292	Raza Asghar	12	15/02/1982	24/11/2009	GPS Zakhtan	
26	293	Farhan	12	10/02/1981	24/11/2009	GPS Palnasi	
27	294	S. S. Khan	12	10/05/1986	24/11/2009	GPS Inimwar	
28	298	Nasim Hussain	12	09/10/1987	24/11/2009	GPS And Khel Bala	
29	299	Muhammad Aslam	12	18/02/1985	25/11/2009	GPS Berapi Ali Khel	
30	300	Muhammad Aslam	12	23/04/1986	24/11/2009	GPS Panjam Ali Khel	

6-6

303	Amir ur Rehman	12	03/10/1982	24/11/2009	GPS Khadizai No.1
304	Hikmat Khan Munawwar	12	02/10/1983	24/11/2009	GPS Swaro Kol
306	Khan Ahhammad	12	25/10/1982	24/11/2009	GPS Chopper Mishli
307	Ghani	12	26/12/1985	24/11/2009	GPS Kh. Ali Khel
308	Faizda Khan	12	13/04/1984	25/11/2009	GPS Yusuf Khel
312	Israfil Khan	12	12/05/1986	24/11/2009	GPS Khadizai 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 Mishli
Member

3. Mr. Abdul Malik
AEDO Orakzai
Member

5. Mrs. Nabila Naz
AEDO Orakzai
Member

7. Mr. Rais Khan
AEDO Orakzai
Member

9. Faramed Ullah Jan
Additional Director NMD
KP E&SD Representative

2. Shakeel Ahmad
SST GHS Swaro Kol
Member

4. Kausar Ali
AEDO Orakzai
Member

6. Muhammad Iqbal (HM)
GHS Mishli Bazar
Member

8. Saif Ullah Pringpai
GHS Mandai
Member

Mr. Faramed Ullah Mehsud
District Education Officer Orakzai
(Chairman)



District Education Office
District Orakzai

4 B
No. 6660
Date 12/12/2020

Phone: 0925-690017 FAX: 0925-690017

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-12 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	Zameer Ali	15	05/02/1970	01/03/1993	GPS Noor Ali Garhi	GMS Mirzai
2	66	Arnal Hassan	15	01/08/1970	23/05/1995	GPS Garhi Mani Khel	GMS Kalaya
3	126	Hassanullah	15	13/02/1972	31/03/2001	GPS Khawas Khel	GMS Akwarha Khel
4	159	Ali Majan	15	05/03/1979	01/09/2003	GPS Sarka Aakhe	GMS Tooti Bagh Orakzai
5	160	Yasin Ullah	15	02/01/1980	01/09/2003	GPS Sarla Mishil	GMS Mishil Bazar
6	161	Munawar Shah	15	10/03/1982	01/10/2003	GPS Sarki Khel	GMS Inzer Paili
7	166	Abdul Shakoor	15	21/03/1972	23/10/2003	GPS Sama Mamozai	GMS Dran Shalkhan
8	169	Samar Gul	15	21/01/1979	29/07/2004	GPS Sangra	GMS Mishil Bazar
9	170	Muhammad Razaq	15	05/06/1979	03/08/2004	GPS Taropi A. Khel	GMS Sarki Khel
10	178	Muhammad Umer	15	22/04/1976	03/09/2005	GPS Rambic Salai	GMS Gulistan
11	188	Muhammad Asghar	15	6/10/1984	05/09/2005	GPS Khangar Bazar	GMS Sarki Khel
12	205	Muhammad Bilal	15	02/02/1979	23/10/2005	GPS Biland Khel No.2	GMS Biland Khel
13	206	Muhammad Usman	12	05/05/1985	24/11/2009	GPS Star Sam	GMS Star Sam
14	217	Muhammad Usman	12	01/03/1986	24/11/2009	GPS Mir Kalam Khel	GMS Qasim Khel Orakzai
15	219	Muhammad Usman	12	09/03/1987	24/11/2009	GPS Malang Garhi	GMS Yakhoo Gondow
16	220	Muhammad Usman	12	21/12/1982	24/11/2009	GPS Bada Shalkhan	GMS Mishil Bazar
17	252	Muhammad Usman	12	05/10/1985	24/11/2009	GPS Gul Cheri	GMS Babera Lavi
18	253	Muhammad Usman	12	15/10/1982	03/12/2009	GPS Bilazawi	GMS Salir Feroz Khel
19	274	Muhammad Usman	12	01/04/1980	24/11/2009	GPS Bazar Khel	GMS Mir Meki Shalkhan

(Signature)
District Education Officer
Orakzai District at Hangu.

Regulatory

Postal

20	285	Mali Ur Rehman	12	20/05/1984	24/11/2009	GPS Jabo Koda	GHS Avi Melo
21	287	Gul Rahim	12	05/04/1979	24/11/2009	GPS Kcrapa Samana	GHS Gullstan
22	288	Ashfaq Ali	12	18/03/1985	24/11/2009	GPS Khar Khushia	GMS Khalil Sepoy (Khura)
23	289	Maskeen Khan	12	10/04/1984	02/12/2009	GPS Toor Kan	GMS Damber Lasli
24	290	S.Khadim Hussain	12	03/05/1985	24/11/2009	GPS Shamer	GHS And Khel
25	291	Raees Akbar	12	16/02/1982	24/11/2009	GPS Zarhtar	GHS Dron Sheikhan
26	292	Hussain Akher	12	10/02/1981	24/11/2009	GPS Palpasl	GMS Khalil Sepoy
27	295	Mihwar Khan	12	10/05/1986	24/11/2009	GPS Injwar	GHS Saifal Dara
28	298	Shefir Hassan	12	09/10/1987	24/11/2009	GPS And Khel Bala	GMS Zera
29	300	Arjad Khan	12	10/02/1985	25/11/2009	GPS Binapl Ali Khel	GMS Zanki Khel
30	302	Saib-Ul-Harn	12	20/04/1986	24/11/2009	GPS Parlam Ali Khel	GMS Alwarha Melo
31	303	Armir ur Pehman	12	03/10/1982	24/11/2009	GPS Khadizai No.1	GHS Swaro Kol
32	304	Hikmat Khan	12	02/10/1983	24/11/2009	GPS Sawaro Kol	GHS Swaro Kol
33	305	Munwar Khan	12	25/10/1982	24/11/2009	GPS Chopper Mishli	GMS Babe'a Lari
34	307	Muhammad Ghani	12	26/02/1985	24/11/2009	GPS Kol Ali Khel	GMS Damber Lasli
35	308	Palinda Khan	12	13/04/1984	25/11/2009	GPS Yusuf Khel	GHS Bagh Nak
36	312	Ibrahim Khan	12	12/05/1986	24/11/2009	GPS Khadizai 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 are 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. Their inter-se seniority on lower post will remain intact.
6. No TA/DA is allowed for joining his duty.
7. They will give an under taking to be recorded in their service book to the effect that if any over payment is made to him in light this order will be recovered and if he is wrongly promoted he will be reversed.

DISTRICT EDUCATION OFFICER
DISTRICT DRAKZAI

Encls: Ms 6661-67 dated: 10/12/2020

Copy forwarded for information and necessary action to the:

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

(12)

Alama Iqbal Open University
Islamabad

'C"-11-



Serial No 131508

Certified that *Mr./Ms* MUTI UR REHMAN
Son/Daughter of PAYAU KHAN
Registration No 04AOI0033 *Roll No* P483395
Semester Autumn 2006 *having met all the requirements under*
the semester system is this day awarded the degree of

Bachelor of Arts
Group - General

He/She has scored 61 *marks*
and has been placed in B *grade*

[Signature]
CONTROLLER OF EXAMINATIONS



[Signature]
VICE-CHANCELLOR

Result declared on: August 24, 2007

Date of issue: June 13, 2011

NOTE: THIS DEGREE IS TO BE READ IN CONJUNCTION WITH THE TRANSCRIPT/PROVISIONAL CERTIFICATE ISSUED SEPARATELY

S No 2085

Departmental Examinations Schools & Literacy Department, NWFP



**NWFP
DETAILED MARKS CERTIFICATE**

Training Classes Examination CT (General)

Name Mutia Rehman

Session 2005

Father's Name Dayaw Khan

Roll No 85

Subject	Maximum Marks	Marks obtained		
		THEORY	EXERCISES	TOTAL
1. Theory and History of Education	100			74
2. Child Development	100			73
3. Social and Community Development	100			68
4. General Methodology & Comparison of Teaching Methods	100			62
5. Curriculum Theory and Evaluation	100			80
6. Organization of Elementary Educational Schools	100			64
7. English	100			50
8. Mathematics	100			66
9. School Curricula	100			60
10. Multiple	100			80
11. Teaching Process	100			147
Tota	1200			824

Note: Errors/omissions are excepted

Prepared by _____ Division _____
 Checked by _____
 Date of Declaration of Results _____

30 DEC 2005

 Deputy Director (Examinations),
 Schools & Literacy Department,
 NWFP, Peshawar

S No 5

Roll No. 85

GOVERNMENT ELEMENTARY TEACHERS TRAINING COLLEGE

MIR ALI (NORTH WAZIRISTAN AGENCY)

PROVISIONAL CERTIFICATE

Adm. No. 25

Session 2004-2005

Certified that Mr. Mutiur Rehman So Payani Khana of Malji Agency was declared passed in the CT/PTC/DM Examination held by the Registrar Departmental Examinations N.W.F.P. Peshawar on 31-8-2005 Under Roll No. 85 Obtaining 826 Marks out of 1200 and was placed in the I Division.

The Examination was taken as a whole/in parts.

His conduct during the session was good

Date of declaration of

Result 30-12-2005

Date of issue 17-1-2006

Prepared by

Checked by

PRINCIPAL, Government Elementary College, Mir Ali (N. Waziristan Agency)



"D" - 14-

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

NO. 1881 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 PST (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 such like cases, if any, and compliance report may be shared with this Office, please.

10/4/23
Assistant Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa

Endst: 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

Wahidullah
76/3/23



OFFICE OF THE DISTRICT EDUCATION OFFICER
DISTRICT HEADQUARTER ORAKZAI AT BABER ME
Phone # 0925-690017 Fax # 0925-690017
Email: daorakzai2020@gmail.com

ORAKZAI
HANGU



No. 1344 Dated 29/05/23

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 17/04/2023 wherein it has been directed to withdraw the promotion order of twenty four/24 PSTs BPS: 12 to CT BPS: 15 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 at P ST 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 the aforesaid PSTs.
- 3) WHEREAS, in case of availability of the sanctioned posts of SPST 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 17/04/2023 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, Peshawar office letter vide cited above.
4. Office Copy.

DISTRICT EDUCATION OFFICER-(M)



OFFICE OF THE DISTRICT EDUCATION OFFICER (M) ORAKZAI
 DISTRICT HEADQUARTER ORAKZAI AT BABER MELA HANGU
 Phone #: 0925-690017 Fax #: 0925-690017
 Email: deorakzai2020@gmail.com



No. 41 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 DEO (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 Orakzai of the promotion order held. Furthermore, the following teachers are hereby adjusted in the schools mentioned against their names with immediate effect.

Sl	NAME	CURRENT PLACE OF POSTING	PLACE OF ADJUSTMENT
1.	Iqbal Hussain	GMS Star Sam	GPS Dava Mela
2.	Khalida Jan	GMS Saif Feroz Khel	GPS Siara Fada
3.	Muhammad Yaqoob	GMS Yakh Khandaw	GPS Gorki Khel
4.	Muhammad Hanif	GMS Nishu Bazar	GPS Bada S. Khel
5.	Nasrullah Rehman	GMS Babra Lasti	GPS Gul Chah
6.	Gul Karim	GMS Saif Feroz Khel	GPS Chahat Ali Khel
7.	Dafa Shah	GMS Barzi Khel	GPS Rangan Khel
8.	Muhammad Rehman	GMS Awi Mela	GPS Daga Pakhtak
9.	Gul Rahim	GMS Qubistan	GPS Khoe Koda Mela
10.	Ashfaq Ali	GMS Khalil Sepoy	GPS Bal Ke
11.	Maskeen Khan	GMS Damber Lasti	GPS Drar Chelki
12.	Syed Khadim Hussain	GMS Andhel	GMS Shamar
13.	Rasool Akbar	GMS Vampamba	GPS Kagmal Sher Khel
14.	Muhammad Asghar	GMS Khalil Sepoy	GPS Khur Khushla
15.	Munawar Khan	GMS Saifal Darrah	GPS Arkho, Kili
16.	Shuren Hassan	GMS Mirako Payan	GPS Saeman Khel
17.	Amjad Khan	GMS Zanka Khel	GPS Tagh
18.	Saqib Ul Islam	GMS Jarma District Kohat	Will be excluded as and when the inter district transfer is withdrawn by the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa
19.	Amir ul Rehman	GMS Swaro Kot	GPS Swaro Kot
20.	Hikmal Khan	GMS Swaro Kot	GPS Khatul No.1
21.	Munawar Khan	GMS Chapper Nishu	GPS Zai Chappal
22.	Muhammad Ghani	GMS Siara Koda	Kot Ali
23.	Panda Khan	GMS Baghar	Ghulak A. Khel
24.	Israfil Khan	GMS Dana Khela	GPS Tarf-e-Ali Khel

Note:

- 1) Fresh charge report in their original Basic Pay Scales as on 09-12-2020 should be submitted to the 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 No SP 18, already transferred to District Kohat vide Directorate of P.E.S.E KP No. 13522.
- 2) Additional Director (Estab), Directorate of E&SE, IAS, Peshawar.
- 3) District Education Officer (M), District Kohat.
- 4) District Monitoring Officer, EJAA, District Orakzai.
- 5) District Accounts Officer, District Orakzai.
- 6) Deputy DEO (IA), Orakzai.
- 7) Assistant Director (Estab), Directorate of E&SE, KP, Peshawar vide his office letter quoted above.
- 8) Principals/Head Master/Incharge HIA and Haveli Teachers concerned.
- 9) EDOs concerned for further necessary action.
- 10) Superintendent/ Pay Clerk D/O the DEO (IA) Orakzai for further necessary action.
- 11) EDOs concerned for further necessary action.
- 12) EDOs concerned for further necessary action.
- 13) Office Copy.

DISTRICT EDUCATION OFFICER (MALE)
 DISTRICT ORAKZAI

خدمت جناب ڈسٹرکٹ ایجوکیشن آفیسر ضلع اورنگزی

۹۴۷ - ۱۷ - جناب عالی

آئی ڈی ایف
۱۵/۱۱/۲۰۲۳

جناب عالی - نظر ثانی اسپل برائے ڈیگریڈیشن آرڈر

گزارشیں محوز الوزیہ ہے۔ کہ ہمارا آرڈر بطور PST (23/11/2009) کو

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

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

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

زیادہ حالی تھے۔ PSHT (15 سکین) نہ ہوئے ہیں ان اساتذہ کو CT پر پروموشن

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

جناب والد - اب ڈیوٹی سبیل 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 اقدس میں گزارش کی جاتی ہے۔ کہ اس ڈیگریڈ آرڈر

پر نظر ثانی کر کے سائٹین کو اصراف دے کر مشکور فرمائیں۔

سین لٹاؤش ہوگی۔ مورخہ 20/05/2023

copy to

1 - ڈی ای او اورنگزی

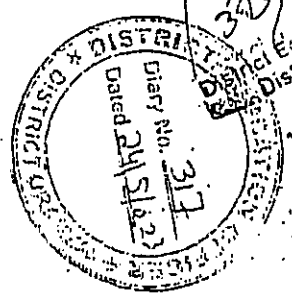
2 - ڈی ای او اورنگزی

3 - ڈائریکٹر آف ایلیمنٹری ایجوکیشن

سکندری ایجوکیشن

4 - سیکرٹری ایجوکیشن کے پی کے

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



- 17/A
- | | | | |
|----|-------------|----|-------------|
| 14 | اسرار افغان | 1 | تاقب السلام |
| 15 | فانسان | 2 | منور افغان |
| 16 | فانسان | 3 | افغان |
| 17 | منور افغان | 4 | منور افغان |
| 18 | منور افغان | 5 | افغان |
| 19 | منور افغان | 6 | افغان |
| 20 | منور افغان | 7 | منور افغان |
| 21 | منور افغان | 8 | دین شاه |
| 22 | منور افغان | 9 | منور افغان |
| 23 | منور افغان | 10 | منور افغان |
| | | 11 | منور افغان |
| | | 12 | منور افغان |
| | | 13 | منور افغان |

- 17/B-

"F/1"



SECONDARY EDUCATION KHYBER
PAKHTUNKHWA PESHAWAR
P.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.

14/9/8/2023
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

