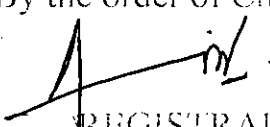


FORM OF ORDER SHEET

Court of _____

Appeal No. 1694/2023


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. Syed Khadim Hussain 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 Syed Khadim Hussan CT, GHS and Khel 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. 1659 /S.T,

Dt. 9/6 /2023.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Noor Muhammad Khattak Adv.
High Court Peshawar.

Note

R/str,

The Department of the appellant is already annexed with the appeal i.e at Page, 17. So far as the rejection/appellate order is concerned the same has ^{not} been issued to the appellant as a separate order rather the same has been issued/written on the face of the departmental appeal which is available at annexure - F, Page 16.

in light of the above the instel appeal may kindly be placed before the Honorable Bench (S.B) for consideration/decision.

9/6/2023
Noor Muhammad Khattak
A.S.S

1731

12/6/23

NO: 1860/ST
04-07-2023

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 1694 /2023

SYED KHADIM HUSSAIN

V/S

EDUCATION DEPTT:

INDEX

S. NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of appeal	1-13
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	11-12
5.	Copies of the letters	D	13-14
6.	Copy of the office order dated 19.05.2023	E	15
7.	Copy of the departmental appeal	F	16
8.	Vakalatnama	17

APPELLANT

Through:

NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT

-1-

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL NO. 1694 /2023

Mr. Syed Khadim Hussain, CT (BPS-15),
GHS and 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~~ 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~~

SYED KHADIM HUSSAIN

Through:

NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT

KAMRAN KHAN

UMAR FAROOQ

MUHAMMAD AYUB

WALEED ADNAN

MAHMOOD JAN

Advocates, Peshawar

AFFIDAVIT

I, Syed Khadim Hussain, CT (BPS-15), GHS and 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

SYED KHADIM HUSSAIN

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:

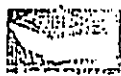
1. That, the titled appeal is submitted before this Honorable tribunal along with this application in which no date has been fixed yet.
2. That the applicant had filed the titled appeal against order dated 19.05.2023 whereby his promotion from PST to CT notification has been withdrawn.
3. That, all the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


NOOR MUHAMMAD KHATTAK
ADVOCATE SUPREME COURT



District Education Office
District Orakzai

"A" - 8-5-

No. 35/4

Phone 0925-690017 FAX 0925-690013

Dated 15/10/2020

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 Mandali District Orakzai | Member |
| 4. Mr. Muhammad Iqbal, HM GHS Mishli Bazar | Member |
| 5. Kausar Ali, ADEO District Orakzai | Member |
| 6. Mr. Abdul Abdul Malik, ADEO District Orakzai | Member |
| 7. Mst. Nabila Naz, ADEO District Orakzai | Member |
| 8. Mr. Shakeel Ahmed, SST GHS Swaro Kol | 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.L. #	Name of teacher	BP S	Date of Birth	Regular Service	Place of Posting	Remarks
1	36	Zaman Ali	15	05/02/1970	01/03/1993	GPS Naar Ali Garhi	
2	86	Amal Hassan	15	01/08/1970	23/03/1995	GPS Garhi Mani Khel	
3	126	Hassanullah	15	13/02/1972	31/03/2001	GPS Khawas Khel	
4	150	Ali Mujam	15	05/03/1979	01/09/2003	GPS Sarka Ankhel	
5	160	Yasir Iqbal Munawar	15	02/01/1980	01/09/2003	GPS Sarka Adishti	
6	161	Shah	15	10/03/1982	01/10/2003	GPS Sarka Khel	
7	166	Abdul Shakoor	15	01/03/1972	23/10/2003	GPS Sana Mamasai	
8	169	Samar Gul Khilji	15	01/01/1979	29/07/2004	GPS Sangra	
9	170	Rehman Muhammad	15	05/06/1979	03/08/2004	GPS Tarapt Ali Khel	
10	175	Umer	15	23/04/1976	03/09/2005	GPS Rambic Salai	
11	218	Mir Asghar	15	16/10/1984	05/09/2005	GPS Khangar Baar	
12	219	Wahed Ullah	15	02/02/1979	23/10/2005	GPS Bhand Khel No.2	
13	277	Iqbal Hussain	12	05/03/1985	24/11/2009	GPS Sier Sami	
14	278	Khateer Jan Muhammad	12	01/03/1986	24/11/2009	GPS Mir Kalam Khel	
15	279	Yaqoob Muhammad	12	09/03/1987	24/11/2009	GPS Malang garhi	
16	280	Hanif Naseeb	12	21/12/1982	24/11/2009	GPS Bada Sheikhon	
17	282	Rehman	12	05/10/1985	24/11/2009	GPS Gul Cheri	
18	283	Gul Karim	12	15/01/1982	03/12/2009	GPS Bilazawi	
19	284	Dalil Shah Ali U'r	12	04/04/1980	24/11/2009	GPS Bazed Khel	
20	285	Rehman	12	20/05/1984	24/11/2009	GPS Jahn Kada	
21	287	Gul Rahim	12	05/04/1979	24/11/2009	GPS Karapa Samana	
22	288	Ashfaq Ali	12	18/03/1985	24/11/2009	GPS Khar Khushita	
23	289	Alastan Khan S Khawam	12	10/04/1984	02/12/2009	GPS Taar Kani	
24	290	Hussain	12	03/05/1985	24/11/2009	GPS Shamer	
25	291	Razaq Akbar Hussain	12	15/02/1982	24/11/2009	GPS Zakhtan	
26	293	Asghar Munawar	12	10/02/1981	24/11/2009	GPS Palaosi	
27	295	Khan	12	10/05/1986	24/11/2009	GPS Hijawar	
28	295	Shahin Hassan	12	09/10/1987	24/11/2009	GPS And Khel Bala	
29	300	Amjad Khan Saqib	12	18/02/1985	25/11/2009	GPS Berapt Ali Khel	
30	302	Islam	12	20/04/1986	24/11/2009	GPS Panjam Ali Khel	

- 6 -

31	303	Amir ur Rehman	13	03/10/1982	24/11/2009	GPS Khadizal No.1
32	304	Hikmat Khan	12	03/10/1983	24/11/2009	GPS Sawaro Kot
33	306	Ahmad Khan	12	25/10/1982	24/11/2009	GPS Chapper Mishli
34	307	Muhammad Ghani	12	26/02/1985	24/11/2009	GPS Kari Ali Khel
35	308	Paluda Khan	12	13/04/1984	25/11/2009	GPS Yusuf Khel
36	312	Israjil 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 Mishli
 Member

2. Shakeel Ahmad
 SST GHS 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 Mishli Bazar
 Member

7. Mr. Rais Khan
 ADEO Orakzai
 Member

8. Saif Ullah Principal
 GHS Mandall
 Member

9. Fameed Ullah Jan
 Additional Director NMD
 KP E&SED Representative

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



**District Education Office
District Orakzai**

4B
No. 6660-9-8
Date: 12/02/2020

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-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	Zeenal Ali	13	05/02/1970	01/03/1993	GPS Noor Ali Garhi	GMS Mirzai
2	65	Armal 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 Khawa: Khel	GMS Akwarha Mela
4	152	Ali Majeed	15	05/03/1979	01/09/2003	GPS Sarka Aakhe	GHS Tooli Bagan, 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 Khe	GMS Inzer Palli
7	166	Abdul Shakoor	15	01/03/1972	23/10/2003	GPS Sama Mamozai	GHS Dron Sheikhan
8	169	Samar Gul	15	01/01/1979	29/07/2004	GPS Sararc	GMS Mishli Bazar
9	170	Muhammad	5	05/06/1979	03/08/2004	GPS Tarapi Ali Khel	GMS Sarki Khel
10	178	Muhammad	15	22/04/1974	03/09/2005	GPS Rambi Salai	GMS Gulistan
11	179	Muhammad	13	14/10/1981	05/09/2005	GPS Khangor Bazar	GMS Sarai Khel
12	180	Muhammad	15	02/02/1979	23/10/2005	GPS Biland Khel No.2	GMS Biland Khel
13	181	Muhammad	15	03/05/1985	24/11/2009	GPS Star Sam	GMS Star Sam
14	182	Muhammad	12	01/03/1986	24/11/2009	GPS Mir Kaur Khel	GMS Casim Khel, Orakzai
15	183	Muhammad	12	09/03/1987	24/11/2009	GPS Malang garhi	GMS Yakha Kondaw
16	184	Muhammad	12	31/12/1982	24/11/2009	GPS Bada Sheikhan	GMS Mishli Bazar
17	185	Muhammad	12	03/10/1985	24/11/2009	GPS Gul Chz	GMS Babera Lasi
18	186	Muhammad	12	05/01/1982	03/12/2009	GPS Bilazawi	GMS Sali Farooz Khel
19	187	Muhammad	12	01/04/1980	24/11/2009	GPS Bared Khel	GMS Mir Mela Sheikhan

(Signature)
District Education Officer
Orakzai District at Hangu

Rajiv P. Patel

20	285	Mali Ur Pehman	12	20/05/1984	24/11/2009	GPS Jabo Koda	GHS Awi Mela
21	287	Gul Rahim	12	05/04/1979	24/11/2009	GPS Karapa Samana	GHS Gullistan
22	288	Ashfaq All.	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 Lassi
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 Zakhtar	GHS Dran Jheikhan
26	293	Hussain Anghar	12	10/02/1981	24/11/2009	GPS Pabasi	GMS Khalil Sepoy
27	295	Minawar Khan	12	10/05/1986	24/11/2009	GPS Injwar	GHS Saifal Dara
28	298	Hassan	12	09/10/1987	24/11/2009	GPS And Khel Bala	GMS Zera
29	300	Afnad Khan	12	10/02/1985	25/11/2009	GPS Ilurapi Ali Khel	GMS Zanku Khel
30	302	Saqib Ullah	12	20/04/1986	24/11/2009	GPS Panjam Ali Khel	GMS Alwarha Mela
31	303	Amir ur Pehman	12	03/10/1982	24/11/2009	GPS Khadizal No.	GHS Swara Kol
32	304	Hikmat Khan	12	02/10/1983	24/11/2009	GPS Sawara Kol	GHS Swara Kol
33	306	Munawar Khan	12	25/10/1982	24/11/2009	GPS Chopper Alshil	GMS Babe'a Laki
34	307	Muhammad Ghani	12	26/02/1985	24/11/2009	GPS Kol Ali Khel	GMS Damber Lassi
35	308	Palinda Khan	12	13/02/1984	25/11/2009	GPS Yusuf Khel	GHS Bagh Nak
36	312	Ibrahim Khan	12	12/05/1986	24/11/2009	GPS Khadizal 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 dealt as per order the rules framed time to time.
4. All reports should be submitted to all concerned.
5. Their seniority on lower pos. 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 ever promoted he will be reversed.

**DISTRICT EDUCATION OFFICER
DISTRICT ORAKZAI**

Date: 10/12/2020

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

(20)

ALLAMA IQBAL OPEN UNIVERSITY ISLAMABAD
PROVISIONAL RESULT CARD



Name: SYED KHADIM HUSSAIN
Father's Name: SYED BASWAR HUSSAIN
Address: VILL SHAMAR P/O TAZI KHEL

Roll No. 407022119
Register No. 05ADI0073
Final Semester: SPR-2010

Tehsil: ORAKZAI AGENCY
District: ORAKZAI AGENCY
has successfully completed: BACHELOR OF ARTS GROUP-GENERAL

The detail of passed courses are as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
AUT-07	0407	HISTORY OF MODERN MUSLIM WORLD	100	67
SPR-08	0437	ISLAMIC STUDIES(E)	100	62
SPR-08	0404	URDU	100	54
SPR-08	0408	ARABIC	100	72
BPR-09	0417	PAKISTAN STUDIES(C)	100	65
AUT-09	0430	PRINCIPLES OF JOURNALISM	100	47
SPR-10	0435	ENGLISH	100	59
BPR-10	0436	BEERAT-E-TAYYABA	100	68
SPR-10	0416	ISLAMIAT (C)	100	62

CREDITS: 8

Total Marks / Obtained: 900 / 554

Result Declared on: FEB 22, 2011

Percentage / Grade: 62 B

Date of issue: MARCH 02, 2011

[Signature]
Controller of Examinations

Disclaimer: This result card is issued provisionally, errors and omissions excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate, degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.

Serial No.

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD PROVISIONAL RESULT CARD



- 12 -

Name
Father's Name
Address

MR. MUHAMMAD MUSTAFI
MR. SAJJAD ALI KHAN
P.O. SHARIF, TARI KHIL

Roll No. S621025
Registration No. 05AD10075
Final Semester SPR- E006

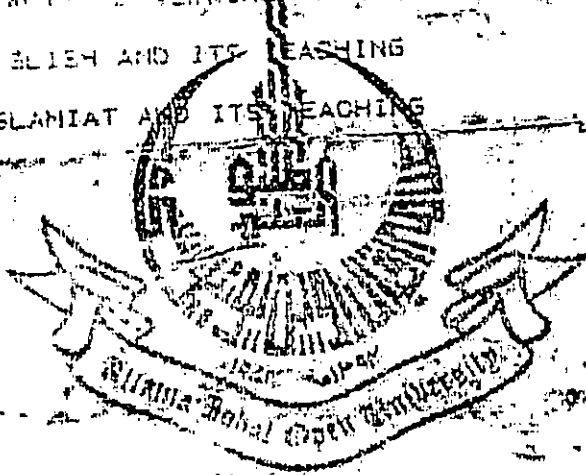
Tehsil
District

FINANCIAL AGENCY
FINANCIAL AGENCY

has successfully completed **CERTIFICATE OF TEACHING**

The detail of passed courses are as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
2006-05	0621	DIMENSIONS IN EDUCATION	100	77
2006-05	0622	EDUCATIONAL PSYCHOLOGY	100	85
2006-05	0623	SCHOOL ORGANIZATION	100	85
2006-05	0624	TEACHING STRATEGIES & EVALUATION	100	59
2006-05	0625	URDU LANGUAGE AND ITS TEACHING	100	71
2006-05	0626	SOCIAL STUDIES & ITS TEACHING	100	83
2006-05	0627	PRACTICAL WORKSHOP & TEACHING PRACTICE	100	83
2006-05	0628	ENGLISH AND ITS TEACHING	100	75
2006-05	0629	ISLAMIAT AND ITS TEACHING	100	77



Total Marks / Obtained 900 / 632

Percentage / Grade 70

Result Declared on 05/07/2006

Date of issue 05/07/2006

Controller of Examinations

Disclaimer:
This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.



"D" - 13 -

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 Gulzar 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 such like cases, if any, and compliance report may be shared with this Office, please.

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.

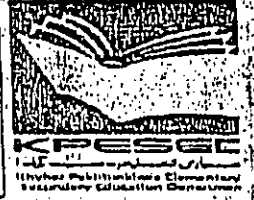
Assistant Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa

withheld ally
7/10
26/3/23



-14-

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 09/05/2023

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: 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 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)

ORAKZAI

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)

ORAKZAI



7E -15-

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) ORAKZAI
DISTRICT HEADQUARTER ORAKZAI AT BABER MELA HANGU
 Phone # 0925-690017 Fax # 0925-690017
 Email: deoorakzai2020@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 11-04-2021, the competent authority DEO (M) Orakzai is pleased to withdraw the promotion orders bearing Endst. No. 6660, dated 10-12-2020 in respect of 26 teachers who were promoted PSTs in EPS: 12 to the posts of CTs in EPS: 15 in District Orakzai of the promotion order dated. 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 Star Sam	GPS Dafa, Dda
2.	Khalida Jan.	GMS Sahi Feroz Khel	GPS Star Kadar
3.	Muhammad Yaqoob	GMS Yakha Kanderi	GPS Gorki F. Hol
4.	Muhammad Hanif	GMS Mishi Bazar	GPS Bada Tirokhan
5.	Naseeb Rahman	GMS Batra Laski	GPS Gul Ch. ad.
6.	Gul Karim	GMS Sahi Feroz Khel	GPS Ghulsa Ab Khel
7.	Dalia Shah	GMS Barzi Khel	GPS Rangin Khel
8.	Maji Ur Rehman	GMS Avi Mola	GPS Daga Takhlak
9.	Gul Rahim	GMS Gulistan	GPS Khoo Kadda No.1
10.	Ashfaq Ali	GMS Khairi Sepoy	GPS Bai Kot
11.	Maskeen Khan	GMS Damber Lasli	GPS Dhan Shin Khan
12.	Syed Khadim Hussain	GHSS Andhial	GHPS Ghannar
13.	Razos Akbar	GMS Wamparva	GPS Kagrai Sher Khol
14.	Hussain Asghar	GMS Khairi Sepoy	GPS Khar Khushla
15.	Munawar Khan	GMS Saial Darrah	GPS Arkh o Khol
16.	Shireen Hassan	GMS Mirako Payan	GPS Suleman Khol
17.	Amjad Khan	GMS Zanta Khel	GPS Tagmal
18.	Saqib Ul Islam	GMS Jarma District Kohat	Will be adjusted to mid 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.	Himal Khan	GMS Swara Kot	GPS Khadzra No.1
21.	Munawar Khan	GMS Chopper Mishi	GPS Za Chopper
22.	Muhammad Ghani	GMS Star Koda	Kot Ali Khel
23.	Panda Khan	GMS Baqmal	Ghulsa Ab Khel
24.	Israfil Khan	GMS Dana Khila	GPS Tatar 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 r/o SN 10, already transferred to District Kohat vide Directorate of E&SE KP No. 13820-81/F.No 51 Transfers Dated Peshawar the 27/12/2022.
- 2) Additional Director (Estab), Directorate of E&SE, IAS, Peshawar
- 3) District Education Officer (M), District Kohat
- 4) District Monitoring Officer, EIAA, District Orakzai
- 5) District Accounts Officer, District Orakzai
- 6) Deputy DEO (M), Orakzai
- 7) Assistant Director (Estab), Directorate of E&SE, KP, Peshawar vide his office after quarter above.
- 8) Principal/Head Master/Incharge HM and Head Teachers concerned.
- 9) EDEOs concerned for further necessary action.
- 10) Superintendent/Pay Clerk D/O the DEO (M) Orakzai for further necessary action.
- 11) Head Master (Primary) of necessary order.
- 12) D/Os concerned
- 13) Office Copy

DISTRICT EDUCATION OFFICER (MALE)
DISTRICT ORAKZAI

خدمت عتاب ڈسٹرکٹ ایجوکیشن آفیسر ضلع اورکڑنی

الحاصلہ

حناب عالی

۹۴-۱۶

عنوان - نظر ثانی ایمل برائے ڈیگریڈیشن آرڈر

گزارش محضور التور یہ ہے۔ کہ ہمارا آرڈر بطور PST (2009/11/23) کو

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

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

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

زیادہ حالی تھیں۔ PSHT (15 سکین) نہ ہونے کی بنا پر ان اساتذہ کو CT پر پروموشن

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

حناب والد - اب ڈیوٹی سال CT پر گزارنے کے بعد ان اساتذہ کو CT (15 سکین) سے دوبارہ

PST (2 سکین) پر ڈیگریڈ کیا گیا۔

لہذا اب صاحبان کی شان افس میں گزارش کیجاتی ہے۔ کہ اس ڈیگریڈ آرڈر

پر نظر ثانی کر کے سائین کرالضاف دے کر شکور فرمائیں۔

مورخہ 20/05/2023

سین تواریش ہوگی۔

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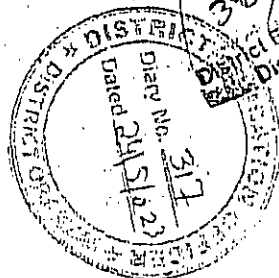
1 - ڈی سی اورکڑنی

2 - ڈی ای او اورکڑنی

3 - ڈائریکٹر آف ایلیمنٹری اینڈ

سنڈری ایجوکیشن

4 - سیکرٹری ایجوکیشن کے پی کے



DPC-2020

PST to CT

All teachers

General (14) اسرار فیضان (14) Sajid (1) نائب الامام

Khanjari (15) خانجاری (15) M. Mulk (2) منور افغان (2)

H. H. (16) ح. ح. (16) A. A. (3) احمد افغان (3)

M. M. (17) منور افغان (17) A. A. (4) احمد افغان (4)

~~H. H.~~ (18) ح. ح. (18) A. A. (5) احمد افغان (5)

~~M. M.~~ (19) منور افغان (19) A. A. (6) احمد افغان (6)

(20) احمد افغان (20) M. M. (7) منور افغان (7)

(21) احمد افغان (21) D. D. (8) دلیلی شاه (8)

(22) احمد افغان (22) J. J. (9) جلیلی افغان (9)

(23) احمد افغان (23) S. S. (10) سید افغان (10)

(24) احمد افغان (24) M. M. (11) منور افغان (11)

(25) احمد افغان (25) A. A. (12) احمد افغان (12)

(26) احمد افغان (26) P. P. (13) پانزی افغان (13)

-16/B-

"F/1"



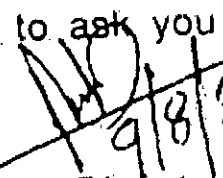
SECONDARY EDUCATION KHYBER
PAKHTUNKHWA PESHAWAR
F.NO. 61/DISTRICT CADRE TRANSFERS
NO. 22964 DATED 09-08/2023

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.


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

- 17 -

VAKALATNAMA
BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

Appeal No 12023

Syed Wahidul Hussain
(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Education Dept
(RESPONDENT)
(DEFENDANT)

I/We Appellant

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. _____/_____/202

CLIENT

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 3rd Floor,
Deans Trade Centre, Peshawar Cantt.
(0311-9314232)