


# FORM OF ORDER SHEET

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

**Appeal No. 1693/2023**

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. Gul Karim is re-submitted today by Mr. Noor Muhammad Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 24-08-2023.</p> <p>By the order of Chairman  REGISTRAR</p>

The appeal of Mr. Gul Karim CT GMS Safri Feroz 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.
- 3- Memorandum of appeal be signed by the appellant.

No. 1634 /S.T,

Dt. 9/6 /2023.



REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Noor Muhammad Khattak Adv.  
High Court Peshawar.

N/Sir,

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

12/6/23

No: 1860 /ST.

04-07-2023

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR**

APPEAL NO. 1693 /2023

GUL KARIM

V/S

EDUCATION DEPTT:

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APPELLANT

Through:

**NOOR MOHAMMAD KHATTAK**  
ADVOCATE SUPREME COURT

- 1 -

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

APPEAL NO. 1693 /2023

Mr. Gul Karim, CT (BPS-15),  
GMS Safri Feroz 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1974 AGAINST THE IMPUGNED ORDER DATED 19.05.2023 WHEREBY THE PROMOTION ORDER DATED 10.12.2020 OF THE APPELLANT HAS BEEN WITHDRAWN AND AGAINST THE APPELLATE ORDER DATED 09-08-2023 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT HAS BEEN REGRETTEED ON NO GOOD GROUNDS.**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 03.12.2009, 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/PSST/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

**GUL KARIM**

Through:

**NOOR MOHAMMAD KHATTAK**  
ADVOCATE SUPREME COURT

**KAMRAN KHAN**

**UMAR FAROOQ**

**MUHAMMAD AYUB**

**WALEED ADNAN**

**MAHMOOD JAN**

Advocates, Peshawar

**AFFIDAVIT**

I, Gul Karim, CT (BPS-15), GMS Safri Feroz 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

GUL KARIM

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

No. 35/4

Phone 0925-690011 FAX 0925-690017

Dated 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. Hamood Ullhan Jani, Additional Director NMD             | (KPE&SED Representative) |
| 3. Mr. Saif Ullah, Principal B-19 GHS Mandali District Orakzai | Member                   |
| 4. Mr. Muhammad Inbal, 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 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.L. #	Name of teacher	B.P.S	Date of Birth	Regular Service	Place of Posting	Remarks
1	36 Zeena Ali	15	05/02/1970	01/03/1993	GPS Noor Ali Garhi	
2	66 Amal Hassan	15	01/08/1970	23/05/1995	GPS Garhi Mani Khel	
3	126 Hassamullah	15	13/02/1972	31/03/2001	GPS Khawax Khel	
4	159 Ab Majid	15	05/05/1979	01/09/2003	GPS Sarika	
5	160 Yasun Ullah	15	02/01/1980	01/09/2003	GPS Ankhel	
6	161 Minowar Shah	15	10/03/1982	01/10/2003	GPS Sarla Mishri	
7	165 Abdul Shakoor	15	01/03/1977	23/10/2003	GPS Sarki Khel	
8	169 Samar Gul Khattak	15	01/01/1979	29/07/2004	GPS Sama Mamazai	
9	170 Rehman	15	05/06/1979	03/08/2004	GPS Sangra	
10	175 Mohammad Umar	15	22/02/1976	01/09/2003	GPS Tirapi Ali Khel	
11	215 Mr Asghar	15	16/10/1984	05/09/2005	GPS Rambic Salai	
12	219 Babzar Ullah	15	02/02/1979	23/10/2005	GPS Khungor Boor	
13	277 Iqbal Hussain	12	05/05/1983	24/11/2009	GPS Biland Khel No.2	
14	278 Khushnawaz Muhammad	12	01/03/1986	24/11/2009	GPS Ster Sam	
15	279 Yousaf Muhammad	12	09/03/1987	24/11/2009	GPS Mir Kalam Khel	
16	280 Hameed Nasseeb	12	21/12/1982	24/11/2009	GPS Malang garhi	
17	282 Rehman	12	05/10/1983	24/11/2009	GPS Bada Shalkhan	
18	283 Gul Karim	12	15/01/1982	05/12/2009	GPS Gul Cheri	
19	284 Dahl Shah	12	04/04/1980	24/11/2009	GPS Bilazwi	
20	285 Rehman	12	20/05/1984	24/11/2009	GPS Bazed Khel	
21	287 Gul Rahim	12	05/04/1979	24/11/2009	GPS Jaba Kado	
22	288 Asghar Ali	12	18/05/1985	24/11/2009	GPS Karapa Samana	
23	289 Muskaan Khan S. Khundim	12	10/07/1984	02/12/2009	GPS Khar Khukhta	
24	290 Hussain	12	03/05/1983	24/11/2009	GPS Taar Kani	
25	291 Razaq Akbar Hussain	12	16/02/1983	24/11/2009	GPS Shamer	
26	293 Asghar Muhammad	12	10/02/1981	24/11/2009	GPS Zakhon	
27	295 Khan	12	10/05/1986	24/11/2009	GPS Palaosi	
28	298 Shorin Hassan	12	09/04/1987	24/11/2009	GPS Injavor	
29	300 Amjad Khan Saqib U	12	18/02/1985	25/11/2009	GPS And Khel Bala Khel	
30	302 Islam	12	20/07/1986	24/11/2009	GPS Panjam Ali Khel	

- 6 -

303	Rehman	12	03/10/1982	24/11/2009	GPS Khadizai No.1
304	Hikmat Khan	12	02/10/1983	24/11/2009	GPS Sawara Kot
306	Munawwar Khan	12	25/10/1982	24/11/2009	GPS Chapper Mishli
307	Muhammad Ghani	12	26/02/1985	24/11/2009	GPS Kot Ali Khel
308	Raiydu Khan	12	13/04/1984	25/11/2009	GPS Yusuf Khel
312	Ishtiaq 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

2. Shakeel Ahmad  
SST GHS Sawara 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 Mandali  
Member

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

Mr. Famed Ullah Mansud  
District Education Officer Orakzai  
(Chairman)



District Education Office  
District Orakzai

No. 6660-9-8  
Dated 10/12/2020

Phone: 0925-696017 FAX: 0925-696017

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 mole 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	164	Arif Ali	15	05/02/1970	01/03/1993	GPS Noor Ali Garhi	GMS Mirzai
2	165	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 Alwarha Meia
4	152	Ali Majid	15	05/03/1979	01/09/2003	GPS Sarka Aakhe	GMS Tooli Bagh, Orakzai
5	169	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	GMS Inzer Palli
7	166	Abdul Shakoor	15	01/03/1972	23/10/2003	GPS Soma Mamozai	GMS Drah Shalkhan
8	162	Samar Gul	15	01/01/1979	29/07/2004	GPS Sanara	GMS Mishli Bazar
9	170	Muhammed Rahman	15	05/06/1979	03/08/2004	GPS Tarapi Ali Khel	GMS Sarki Khel
10	178	Muhammad Umer	15	22/04/1976	03/09/2005	GPS Rambic Solai	GMS Gulistan
11	218	Muhammad Asghar Raheed	15	14/10/1984	05/09/2005	GPS Khangar Bazar	GMS Sarki Khel
12	219	Ullah	15	02/02/1979	23/10/2005	GPS Biland Khel No.2	GMS Biland Khel
13	225	Iqbal Hussain	12	05/05/1995	24/11/2009	GPS Star Sam	GMS Star Sam
14	228	Angila Jan Muhammad	12	01/03/1986	24/11/2009	GPS Mir Kalam Khel	GMS Casim Khel, Orakzai
15	229	Yaqoob	12	09/03/1987	24/11/2009	GPS Malang garhi	GMS Yakhha Mandaw
16	260	Muhammad Hanif	12	21/12/1982	24/11/2009	GPS Bado Shalkhan	GMS Mishli Bazar
17	282	Maseeb Rehman	12	05/10/1985	24/11/2009	GPS Gul Chen	GMS Babera Lari
18	233	Gul Konam	12	15/01/1982	03/12/2009	GPS Bilazawi	GMS Sali Feroz Khel
19	284	Dalit Shah	12	04/04/1980	24/11/2009	GPS Dazed Khel	GMS Mir Meki Shalkhan

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

20	285	Mali Ur Pehman	12	20/05/1984	24/11/2009	GPS Jaba Koda	GMS Avi Mela
21	287	Gul Pahim	12	05/04/1979	24/11/2009	GPS Korpo Samana	GMS Gulistan
22	288	Ashfaq Ali	12	18/03/1985	24/11/2009	GPS Khar Khushla	GMS Khalil Sepoy (Khura)
23	289	Maskeen Khan	12	10/04/1984	02/12/2009	GPS Taar Kani	GMS Damber Lash
24	290	S.Khadim Hussain	12	03/05/1985	24/11/2009	GPS Shamer	GMS And Khel
25	291	Rajer Akbar Hussain	12	16/02/1982	24/11/2009	GPS Zakhlan	GMS Dhan Sheikhhan
26	292	Zaher Minawar Khan	12	10/02/1991	24/11/2009	GPS Palbas	GMS Khalil Sepoy
27	293	Maskeen Khan	12	10/05/1986	24/11/2009	GPS Injwar	GMS Saifal Dera
28	294	Hassan	12	09/10/1987	24/11/2009	GPS And Khel Bala	GMS Zera
29	300	Azjad Khan	12	10/02/1985	25/11/2009	GPS Bhalal Ali Khel	GMS Panju Khel
30	302	Jaab Ull Khura	12	20/04/1986	24/11/2009	GPS Pan'am Ali Khel	GMS Alwarha Bala
31	303	Azad ur Pehman	12	03/10/1982	24/11/2009	GPS Khadize No.1	GMS Swaro Kal
32	304	Hirnal Khan	12	02/10/1983	24/11/2009	GPS Sawaro Kal	GMS Swaro Kal
33	305	Minawar Khan	12	25/10/1982	24/11/2009	GPS Chapper Mishli	GMS Babera Lash
34	307	Muhammed Ghani	12	26/02/1985	24/11/2009	GPS Kal Ali Khel	GMS Damber Lash
35	308	Palinda Khan	12	13/04/1984	25/11/2009	GPS Yusuf Khel	GMS Bugh Nak
36	312	Ibrahim Khan	12	12/05/1986	24/11/2009	GPS Khadize 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. h.b.k/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

~~SECRET~~  
DISTRICT EDUCATION OFFICER  
DISTRICT ORAKZAI

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

University of Peshawar  
(Pakistan)

Session ANNUAL 2007

SIL KAMIN

Son / Daughter of

HAZRAT NOOR

and a student/private candidate of

DISTRICT PESHAWAR

having passed the Prescribed examination held in

JULY 2007

is this day admitted by the University of Peshawar to the Degree of

Bachelor of Arts

in SECOND Division

The Examination was taken as a whole / in parts

Serial No. 0113317

Registration No.

Roll No.

Result declared on



*[Signature]*  
Registrar

Countersigned

*M. Iqbal Khan*  
Vice-Chancellor

C-11-11-

DIRECTORATE OF CURRICULUM & TEACHERS EDUCATION, N.W.F.P., ABBOTTABAD

**DIPLOMA IN EDUCATION**

(ORIGINAL CERTIFICATE)

Serial No. 39

Session 2006-07

Roll No. 145

Marks Obtained 1066 / 1500

Division Ist

Certified that Mr./Mrs./Miss Qul Karim

Son/Daughter of Hazrat Neer and a student of

RITE / GEC (M & F) GEC(M) Mir Ali

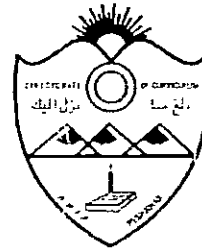
having passed the D.T.E. (Final) Exam: held in August 2007 is qualified to teach in Schools of Elementary & Secondary Education Department.

Prepared by [Signature]

Checked by [Signature]

Result declaration date 15/ 12/ 2007

Date of Issue 15/ 5/ 2010



[Signature]  
Assistant Director (Examinations),  
N.W.F.P., Peshawar.  
KPK. at RITE



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 PST (BS-12) including 23 others were promoted to the post of CT (BS-15) vide No. 6561-69 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.

Assistant Director (Estab)  
Elementary and Secondary Education  
Khyber Pakhtunkhwa

Encls: 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*

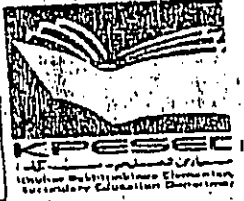
*76/3/23*





OFFICE OF THE DISTRICT EDUCATION OFFICER-(M)-ORAKZAI  
DISTRICT HEADQUARTER ORAKZAI AT BABER MELA-HANGU  
Phone # 0925-690017 Fax # 0925-690017  
Email: deorakzal2020@gmail.com

No. 1344 Dated 09/05/23



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 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 CT 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.

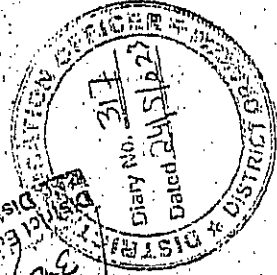
DISTRICT EDUCATION OFFICER-(M)  
ORAKZAI

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



۴- غیر ملکی اسکولوں کے لئے

۳- ڈیپارٹمنٹل اسکولوں کے لئے

۲- ڈیپارٹمنٹل اسکولوں کے لئے

۱- ڈیپارٹمنٹل اسکولوں کے لئے

۱- ڈیپارٹمنٹل اسکولوں کے لئے

Copy to

30/5/2023 مورخہ

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DPC-2020  
PST to CT  
All Teachers

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General 14 اسرار افغان

Sanjid 1 ثقافت اسلام 16/A

Khanjari 15 خانجاری

M. milk 2 منور افغان

H. 16 حیات افغان

A. 3 احمد افغان

m. 17 منور افغان

H. 4 حیات افغان

~~H.~~ 18 حیات افغان

H. 5 اقبال افغان

~~H.~~ 19 حیات افغان

A. 6 اقبال افغان

H. 20 حیات افغان

M. 7 محمد یعقوب

H. 21 حیات افغان

H. 8 دین افغان

H. 22 حیات افغان

H. 9 مکتب افغان

M. 23 منور افغان

M. 10 شریک افغان

H. 24 حیات افغان

A. 11 احمد افغان

P. 13 پسر افغان

-16/B-

"F/1"



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

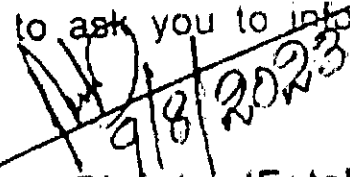
To

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.

  
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

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

Appeal No 12023

Gul Karim (APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

**VERSUS**

Education Deptt (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.        /        / 2022

[Signature]  
**CLIENT**

**ACCEPTED**

[Signature]  
**NOOR MOHAMMAD KHATTAK**  
**ADVOCATE SUPREME COURT**

[Signature]  
**WALEED ADNAN**

[Signature]  
**KAMRAN KHAN**

[Signature]  
**UMAR FAROOQ MOHMAND**

[Signature]  
**MUHAMMAD AYUB**

&

[Signature]  
**MAHMOOD JAN**  
**ADVOCATES**

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