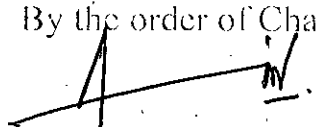


FORM OF ORDER SHEET

Court of _____

Appeal No. 1699/2023


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. Amjad Khan 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</p>  <p>REGISTRAR</p>

The appeal of Mr. Amjad Khan CT, GMS Zanka 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. 1631 /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 it at page No. 16 so far as the rejection appellate order issued written in the file of Departmental appeal which is available at Annexure F page 17

In light of the above the instant appeal may kindly be placed for consideration/decision.


Noor Muhammad
Khattak Adv

1731
12/6/23

No 1860 / ST
Dated 04-07-2023

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 1699 /2023

AMJAD KHAN

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	11-12
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

Through: APPELLANT

NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT

-1-

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL NO. _____/2023

Mr. Amjad Khan, CT (BPS-15),
GMS Zanka 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 25.11.2009, 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


AMJAD KHAN


Through:


NOOR MOHAMMAD KHATTAK


KAMRAN KHAN


UMAR FAROOQ


MUHAMMAD AYUB


WALEED ADNAN


MAHMOOD JAN
Advocates, Peshawar

AFFIDAVIT

I, Amjad Khan, CT (BPS-15), GMS Zanka 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

AMJAD KHAN 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

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 Mehsood, District Education Officer | Chairman |
| 2. Mr. Hameed Ullhan Jan, Additional Director NMD | (KPE&SED Representative) |
| 3. Mr. Saif 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 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.L. No.	Name of teacher	B.P. S.	Date of Birth	Regular Service	Place of Posting	Remarks
1	36	Zeenat Ali	15	05/03/1970	01/03/1993	GPS Naor Ali Garhi	
2	66	Amal Hassan	15	01/08/1970	23/11/1995	GPS Garhi Mani Khel	
3	126	Hassanullah	15	13/02/1972	31/03/2001	GPS Khawas Khel	
4	159	Ali Majid	15	05/03/1979	01/09/2003	GPS Sarka Ankhel	
5	160	Yasin Ullah	15	02/01/1980	01/09/2003	GPS Sarta Mishi	
6	161	Ahmadwar Shah	15	10/03/1982	01/10/2003	GPS Sarki Khel	
7	166	Abdul Shakoor	15	01/03/1972	23/10/2003	GPS Saina Mambzal	
8	169	Samar Gul	15	01/01/1979	29/07/2004	GPS Sangra	
9	170	Rehman	15	05/06/1979	03/08/2004	GPS Tarapi Ali Khel	
10	178	Ahmadwar Umer	15	22/04/1976	03/09/2005	GPS Rambic Sulal	
11	218	Mir Asghar	15	16/10/1984	05/09/2005	GPS Khengar Baar	
12	219	Wahed Ullah	15	02/02/1979	23/10/2005	GPS Biland Khel No.2	
13	277	Iqbal Hussain	12	03/05/1983	24/11/2009	GPS Ster Sam	
14	278	Kheista Jan	12	01/03/1986	24/11/2009	GPS Mir Kalan Khel	
15	279	Ahmadwar Yaqoob	12	09/03/1987	24/11/2009	GPS Malang garhi	
16	280	Ahmadwar Hamid	12	21/12/1983	24/11/2009	GPS Uada Sheikhian	
17	282	Naseeb Rehman	12	05/10/1985	24/11/2009	GPS Gul Cheri	
18	283	Gul Karim	12	15/01/1982	03/13/2009	GPS Bilazwi	
19	284	Dahl Shah	12	04/04/1980	24/11/2009	GPS Bazed Khel	
20	285	Rehman	12	20/05/1984	24/11/2009	GPS Jaha Kadn	
21	287	Gul Rahim	12	05/04/1979	24/11/2009	GPS Karapa Samana	
22	288	Ashiq Ali	12	18/03/1985	24/11/2009	GPS Khar Khushia	
23	289	Maskeen Khan	12	10/04/1984	02/12/2009	GPS Toar Kani	
24	290	Hussain	12	05/05/1983	24/11/2009	GPS Shamer	
25	291	Raza Akbar	12	14/02/1982	24/11/2009	GPS Zakliani	
26	292	Asghar	12	10/02/1981	24/11/2009	GPS Palnosi	
27	293	Ahmadwar	12	10/05/1986	24/11/2009	GPS Injawan	
28	295	Ahmadwar Hussain	12	09/09/1987	24/11/2009	GPS And Khel Bala	
29	300	Ahmadwar	12	15/02/1983	25/11/2009	GPS Beropi Ah Khel	
30	302	Ahmadwar	12	20/04/1986	24/11/2009	GPS Panjam Ali Khel	

-3-6-

-8-7-

303	Amir ur Rehman	12	03/10/1982	24/11/2009	GPS Khadizai No.1
304	Hikmat Khan Ahmadwar	12	02/10/1983	24/11/2009	GPS Sawara Kot GPS Chapper Mishli
306	Muhammad Ghani	12	25/10/1982	24/11/2009	GPS Kot Ali Khel.
307	Palinda Khan	12	26/02/1985	24/11/2009	GPS Yusuf Khel
308	Israjil Khan	12	13/04/1984	25/11/2009	GPS Khadizai No.2
313			12/03/1986	24/11/2009	

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. Raza Khan
ADEO Orakzai
Member

8. Saif Ullah Principal
GHS Mandali
Member

B. Hamid Ullah Jan
Additional Director NMD
KP E&SED Representative

Mr. Farooq Ullah Mahsud
District Education Officer Orakzai
(Chairman)



District Education Office
District Orakzai

No. 6660
Dated 12/12/2021

Phone: 0923-690017 FAX: 0923-690017

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	Zenal 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 Khawaz Khel	GMS Ahwarha Mela
4	159	As Majan	15	05/03/1979	01/09/2003	GPS Sarka Aakhe	GMS Tooli Bogh Orakzai
5	160	Yasin Ullah	15	02/01/1980	01/09/2003	GPS Sarla Mishli	GMS Mishli Emar
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 Sama Mamozai	GMS Dran Salsikhan
8	169	Samar Gul	15	01/01/1979	29/07/2004	GPS Sangra	GMS Mishli Bazar
9	170	Phalil ur Rehman	15	05/06/1979	03/08/2004	GPS Taropi 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 Waheed	15	16/10/1984	05/09/2005	GPS Khangar Bar	GMS Sarki Khel
12	219	Ullah	15	02/02/1979	23/10/2005	GPS Biland Khel No.2	GMS Biland Khel
13	277	Abdul Hussain	12	05/05/1945	24/11/2009	GPS Star Sam	GMS Star Sam
14	278	Amalia 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 Yakho Kandow
16	280	Muhammad Hanif	12	21/12/1982	24/11/2009	GPS Bado Sheikhan	GMS Mishli Bazar
17	282	Maseeb Fehman	12	05/10/1985	24/11/2009	GPS Gul Cheri	GMS Baberc
18	283	Qasim Karim	12	15/01/1982	03/12/2009	GPS Bilozawi	GMS Sofri Feroz Khel
19	284	Qasim Shah	12	04/04/1980	24/11/2009	GPS Bazed Khel	GMS Mir Mela Sheikhan

District Education Officer
Orakzai District at Hangu.

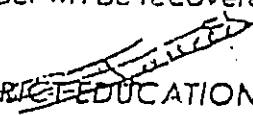
Regular

Posted

20	285	Malik Ur Rehman	12	20/05/1984	24/11/2009	GPS Jaba Kado	GHS Avl Mela
21	287	Gul Rahim	12	05/04/1979	24/11/2009	GPS Karapa Samana	GHS Gullstan
22	288	Ashfaq Ali	12	18/03/1985	24/11/2009	GPS Khar Khushia	GMS Khalil Sepoy (Khura)
23	289	Moskeen Khan	12	10/04/1984	02/12/2009	GPS Toor Kani	GMS Damber Lasi
24	290	S. Khadim Hussain	12	03/05/1985	24/11/2009	GPS Shamer	GHS And Khel
25	291	Roes Akbar	12	16/02/1982	24/11/2009	GPS Zakhlan	GHS Dron Shekhan
26	293	Hussain Anghar	12	10/02/1981	24/11/2009	GPS Palaosi	GMS Khalil Sepoy
27	295	Munawar 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	Arjad Khan	12	10/02/1985	25/11/2009	GPS Ilirapi Ali Khel	GMS Janki Khel
30	302	Saib-Ul-Islam	12	20/04/1986	24/11/2009	GPS Panjam Ali Khel	GMS Alwaro Mela
31	303	Amir ur Pehman	12	03/10/1982	24/11/2009	GPS Khadizal No.1	GHS Swaro Kol
32	304	Hikmal Khan	12	02/10/1983	24/11/2009	GPS Sawaro Kol	GHS Swaro Kol
33	305	Munawar 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 Damner Lasi
35	308	Painda 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 Khadiza No.2	GMS Dana Mela

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. He 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 ORAKZAI

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

For record 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

Serial No. 006563

Roll No. 6155

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Registration No.

2007-FCU-1677

Kohat University of Science & Technology, Kohat (Pakistan)

Session SUPPLEMENTARY, 2009

AMJAD KHAN SON of NAGEED ULLAH KHAN and a student
of GRAZAI AGENCY. having passed the prescribed
examination held in JANUARY, 2009, is this day admitted by

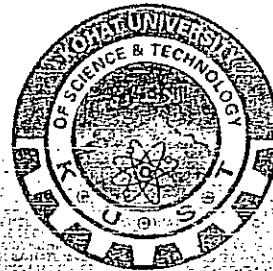
The Kohat University of Science & Technology, Kohat
to the Degree of
Bachelor of Arts

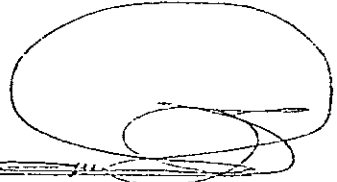
in the SECOND Division

The Examination was taken as ~~whole~~ / in parts


Selected
LECTURER
POST Graduate College
Kohat

Result declared on: MAY 02, 2009




Controller of Examinations

Countersigned


Vice-Chancellor

(22)
ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD
PROVISIONAL RESULT CARD



- 12 -

Serial No. 130365

Name: AMJAD KHAN
 Father's Name: NASEEB ULLAH KHAN
 Address: NABAR KHAN KARYAMA MERCHANT NR SHENO
 KHIL GATE VILL PEHLAWAN BANDA
 Tehsil: KDHAT
 District: KDHAT

Roll No. AL699936
 Registration No. 06NKT0076
 Final Semester SPR-2012

CT

CERTIFICATE OF TEACHING

has successfully completed

The detail of passed courses is as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
AUT- 11	0630	TEACHING STRATEGIES & EVALUATION	100	63
AUT- 11	0633	SCHOOL ORGANIZATION	100	57
AUT- 11	0632	EDUCATIONAL PSYCHOLOGY	100	70
AUT- 11	0631	DIMENSIONS IN EDUCATION	100	67
SPR- 12	0634	ENGLISH AND ITS TEACHING	100	56
SPR- 12	0612	PRACTICAL WORKSHOP & TEACHING PRACTICE	100	85
SPR- 12	0605	SOCIAL STUDIES & ITS TEACHING	100	55
SPR- 12	0635	ISLAMIAT AND ITS TEACHING	100	60
SPR- 12	0604	URDU LANGUAGE AND ITS TEACHING	100	63

M. Asif
 LECTURER
 Graduate College
 Kohat

CREDITS: 5 Total Marks / Obtained 500 / 576
 Percentage / Grade 64 B

Result Declared on JANUARY 16, 2013
 Date of issue JANUARY 26, 2013

M. Asif
 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 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.

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

Israfeel Khan
11/04/23



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 08/07/23



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 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)



"E" - 15-

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



No. 1411 Dated 19/05/2023

OFFICE ORDER:

In compliance of the Directorate of Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar vide letter bearing No. 18011, dated 11-04-2023, the competent authority DED (M) Orakzai is pleased to withdraw the promotion orders bearing Encls: No. 6600, dated 10-12-2020 in respect of the following twenty four promoted PSTs in BPS: 12 to the posts of GTS in BPS: 15 in District Orakzai of the promotion order. 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.	Javed Hussain	GMS Sitr Sam	GPS Baha Mera
2.	Khatsla Jan	GMS Saif Feroz Khel	GPS Saira Koda
3.	Muhammad Yaqoob	GMS Yakho Kandaw	GPS Garki Khel
4.	Muhammad Hanif	GMS MGSU Bazar	GPS Baga Shekhan
5.	Naseeb Rehman	GMS Babra Laski	GPS Gul Chini
6.	Gul Karim	GMS Saif Feroz Khel	GPS Ghulak Ali Khel
7.	Dafa Shah	GMS Bazki Khel	GPS Rangar Khel
8.	Madi Ur Rehman	GMS Aul Mala	GPS Daga Chhatak
9.	Gul Rahim	GMS Ghulistan	GPS Khao Jada No.1
10.	Ashfaq Ali	GMS Khan Sepoy	GPS Balik
11.	Maskeen Khan	GMS Damber Lasu	GPS Damber Laskhan
12.	Syed Khadim Hussain	GMS Andhel	GPS Shera
13.	Rozes Akbar	GMS Wampawa	GPS Karmal Sheh Khel
14.	Hussain Asghar	GMS Khan Sepoy	GPS Khw Mushla
15.	Munawar Khan	GMS Saif Durrah	GPS Aul Khel
16.	Chiren Hassan	GMS Munko Payan	GPS Sulman Khel
17.	Amjad Khan	GMS Zanka Khel	GPS Tagh
18.	Saeed Ullah	GMS Jama District Kohat	Will be adjusted and when the inter district transfer is withdrawn by the Directorate of Elementary & Secondary Education, Khyber Pakhtunkhwa
19.	Amir ur Rehman	GMS Swara Kol	GPS Swara Kol
20.	Hakmal Khan	GMS Swara Kol	GPS Khadizai No.1
21.	Munawar Khan	GMS Chapper Mishil	GPS Zar Chappi
22.	Muhammad Ghani	GMS Saira Koda	Kol Ali Khel
23.	Parvaz Khan	GMS Baghmak	Ghulak Ali Khel
24.	Israfil Khan	GMS Dana Khila	GPS Tarbail Khel

Note:

1. Fresh charge report in the original Basic Pay Scales as on 09-12-2020 should be submitted in 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 request to withdraw inter district transfer order bearing Sl# 18, already transferred to District Kohat vide Directorate of E&SE KP No. 13858-GP/No 51 Transfers Dated Peshawar the 27/12/2022.
- 2) Additional Director (Estab), Directorate of E&SE, IAAE, Peshawar
- 3) District Education Officer (M), District Kohat
- 4) District Monitoring Officer, EIA, District Orakzai.
- 5) District Accounts Officer, District Orakzai
- 6) Deputy DED (M), Orakzai.
- 7) Assistant Director (Estab), Directorate of E&SE, KP, Peshawar vide his office letter on 12/05/2023.
- 8) Principal/Head Master/Incharge HM and Head Teachers concerned.
- 9) EDEs concerned for further necessary action
- 10) Superintendent/Pay Clerk D/O the DED (M) Orakzai for audit/necessary actions
- 11) School Masters (Masters) at concerned schools
- 12) GTS concerned
- 13) Office Copy

DISTRICT EDUCATION OFFICER (MALE)
 DISTRICT ORAKZAI

خدمت حیات ڈسٹرکٹ ایجوکیشن آفیسر ضلع اورکزیٹی

الحاصلہ

حیات عالی ۱۶-۵۴

۱۵/۱۱/۲۰۲۳

عنوان - نظر ثانی اپیل برائے ڈیگریڈیشن آرڈر

گزارش محصور توجہ ہے۔ کہ ہمارا آرڈر بطور PST (23/11/2009) کو

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

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

یہ اساتذہ PST (15 سکیل) کے بھی حقدار تھے؛ چونکہ فائنا میں CT سنی اساتذہ

زیادہ خالی تھیں۔ PSHT (15 سکیل) نہ ہوسا ہیرا ان اساتذہ کو CT پر پروموشن

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

حیات والد - اب ڈیوائس میں CT پر گزارنا ہے بعد ان اساتذہ کو CT (15 سکیل) سے دوبارہ

PST (12 سکیل) پر ڈیگریڈ کیا گیا۔

لہذا اب صاحبان کی شان اقدس میں گزارش کی جاتی ہے۔ کہ اس ڈیگریڈ آرڈر

پر نظر ثانی کر کے سائٹیں کو اصفاء دے کر مشکور فرمائیں۔

مورم 20/05/2023

سین ڈائریشن ہوگی

copy to

1 - ڈی سی اورکزیٹی

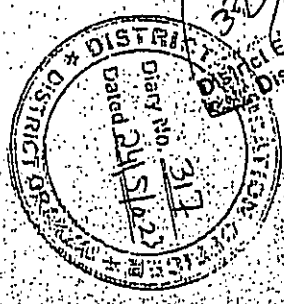
2 - ڈی ای او اورکزیٹی

3 - ڈائریکٹر آف ایلیمنٹری اینڈ

سکنڈری ایجوکیشن

4 - سیکرٹری ایجوکیشن کے پی کے

Handwritten notes and signatures in Urdu, including 'DPC-2020' and 'PST to CT'.



DPC-2020

PST to CT

All teachers

ساجد 1) نائب الامام

اسرار افغان 14)

M milk 2) منور افغان

كلمة افغان 15)

افغان 3) افغان

افغان 16)

افغان 4) افغان

افغان 17)

افغان 5) افغان

افغان 18)

افغان 6) افغان

افغان 19)

افغان 7) افغان

افغان 20)

Daniel 8) دلیلی شاه

افغان 21)

افغان 9) افغان

افغان 22)

افغان 10) افغان

افغان 23)

افغان 11) افغان

افغان 12) افغان

P افغان 13)

-16/B-

'F/1'



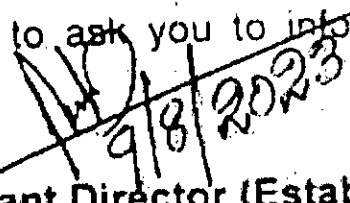
SECONDARY EDUCATION KHYBER
PAKHTUNKHWA PESHAWAR
P.NO. 61/DISTRICT CADRE TRANSFERS
NO. 22964 DATED 09-08/2023

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.


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 /2023

Amjad Khan

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Recruitment 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 Amjad Khan

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)