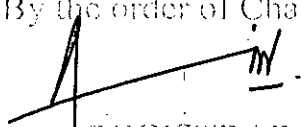


FORM OF ORDER SHEET

Court of _____

Appeal No. _____

1690/2023


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. Amir 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. Amir ur Rehman CT, GHS Swaro Kot 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. 1638 /S.T,

Dt. 9/6 /2023.

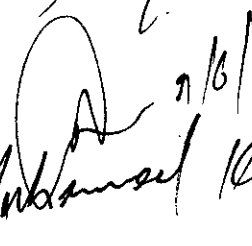

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Noor Muhammad Khattak Adv.
High Court Peshawar.

Note:

Sir,
The departmental appeal of the appellant is already annexed with the appeal i.e. at Page no. 16. So far as the objection/ 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 departmental appeal which is available at annexure - F, Page #16.

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


Noor Muhammad Khattak
ASC
9/6/23

1731
12/6/23 No 1860/ST
04-07-2023

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

APPEAL NO. 1690 /2023

AMIR 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	11-12
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. 1690 /2023

Mr. Amir Ur Rehman, CT (BPS-15),
GHS Swaro Kot, 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

AMIR UR REHMAN

Through:

NOOR MOHAMMAD KHATTAK

KAMRAN KHAN

UMAR FAROOQ

MUHAMMAD AYUB

WALEED ADNAN

MAHMOOD JAN

Advocates, Peshawar

AFFIDAVIT

I, Amir Ur Rehman, CT (BPS-15), GHS Swaro Kot, 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

AMIR 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:
NOOR MUHAMMAD KHATTAK
ADVOCATE SUPREME COURT

District Education Office
District Orakzai

No. 3514

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

Date 14/10/2020

"A" 3-5

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. 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

Sl. No.	Name of teacher	RP S	Date of Birth	Regular Service	Place of Posting	Remarks
1	Zeena Ali	15	05/02/1970	01/03/1993	GPS Noor Ali Garhi	
2	Amal Hassan	15	01/08/1970	23/05/1993	GPS Garhi Mani Khel	
3	Hassanullah	15	13/02/1972	31/03/2001	GPS Khawar Khel	
4	Alli Majid	15	05/03/1979	01/09/2003	GPS Sarka Aakhet	
5	Yasin Ullah	15	02/01/1980	01/09/2003	GPS Sarla Afshid	
6	Munawar Shah	15	10/03/1982	01/10/2003	GPS Sarki Khel	
7	Abdul Shakoor	15	01/03/1972	23/10/2003	GPS Sama Mamozai	
8	Samar Gul Khattak	15	01/01/1979	29/07/2004	GPS Sangra	
9	Rehman Muhammad	15	05/06/1979	03/08/2004	GPS Tarapi Ali Khel	
10	Umer	15	22/04/1976	03/09/2005	GPS Rambic Salal	
11	Mir Asghar	15	16/10/1984	05/09/2005	GPS Khangaar Daar	
12	Walid Ullah	15	02/03/1979	23/10/2005	GPS Biland Khel No.2	
13	Iqbal Hussain	12	05/05/1985	24/11/2009	GPS Sra Sam	
14	Khaista Jan	12	01/03/1986	24/11/2009	GPS Mir Kalan Khel	
15	Muhammad Yaqoob	12	09/03/1987	24/11/2009	GPS Malang Garhi	
16	Muhammad Humit	12	21/12/1983	24/11/2009	GPS Bada Shekhan	
17	Naseeb Rehman	12	05/10/1985	24/11/2009	GPS Gil Cheri	
18	Gul Karim	12	15/01/1982	05/12/2009	GPS Bilazawi	
19	Dalil Shah	12	04/04/1980	24/11/2009	GPS Bazed Khel	
20	Rehman	12	20/05/1984	24/11/2009	GPS Jaha Kada	
21	Gul Rohim	12	05/04/1979	24/11/2009	GPS Karapa Samina	
22	Ashfaq Ali	12	18/03/1985	24/11/2009	GPS Khar Khishita	
23	Muhammad Khan S Khattak	12	10/04/1984	02/12/2009	GPS Toar Kani	
24	Hussain	12	03/05/1985	24/11/2009	GPS Shamer	
25	Raza Akbar Hussain	12	15/02/1982	24/11/2009	GPS Zakhani	
26	Asghar Muhammad	12	10/02/1981	24/11/2009	GPS Palooxi	
27	Khan	12	10/05/1986	24/11/2009	GPS Injaur	
28	Shera Hassan	12	09/10/1987	24/11/2009	GPS And Khel Bala	
29	Amjad Khan Saqib	12	18/02/1985	25/11/2009	GPS Herapi Ali Khel	
30	Imam	12	24/04/1986	24/11/2009	GPS Panjam Ali Khel	

6

32	317	12	25/11/1982	24/11/2009	GPS Khadizai No.1
33	317	12	25/11/1983	24/11/2009	GPS Sawara Kot
34	317	12	25/11/1983	24/11/2009	GPS Chappur Mishli
35	317	12	25/11/1983	24/11/2009	GPS Kori Ali Khel
35	308	12	13/04/1981	25/11/2009	GPS Yusuf Khel
36	312	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 Marjali Bazar
 Member

7. Mr. Rais Khan
 ADEO Orakzai
 Member

8. Saif Ullah Principal
 GHS Marjali
 Member

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

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



District Education Office
District Orakzai

No. 6660 - 9 - 8 -
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-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	15	05/02/1970	01/03/1993	GPS Naor All Garhi	GMS Mirzai
2	65	Amal 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 Mria
4	159	Ali Momen	15	05/03/1979	01/09/2003	GPS Sarka Aokhe	GMS Tooli Bagh, Orakzai
5	139	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 Sama Mamozai	GMS Dran Sheikhhan
8	169	Samar Gul	15	01/01/1979	29/07/2004	GPS Sanara	GMS Mishli Bazar
9	173	PhAli ur Rehman	15	05/06/1979	03/08/2004	GPS Taropi Ali Khel	GMS Sarki Khel
10	178	Muhammad Umar	15	22/04/1976	03/09/2005	GPS Rambic Saldi	GMS Gulistan
11	218	Mir Asghar Wahed	15	16/10/1984	05/09/2005	GPS Khengar Bazar	GMS Sarki Khel
12	219	Ullah	15	02/02/1979	23/10/2005	GPS Biland Khel No.2	GMS Biland Khel
13	277	Iqbal Hussain	12	05/03/1985	24/11/2009	GPS Star Sam	GMS Star Sam
14	273	Amista Jan	12	01/03/1986	24/11/2009	GPS Mir Kalam Khel	GMS Qasim Khel, Orakzai
15	279	Muhammad Yaqoob	12	09/03/1987	24/11/2009	GPS Malang garhi	GMS Yakho Kandaw
16	289	Muhammad Hanif	12	21/12/1982	24/11/2009	GPS Bada Sheikhhan	GMS Mishli Bazar
17	282	Naseeb Rehman	12	05/10/1985	24/11/2009	GPS Gul Cheri	GMS Babera Laki
18	283	Gul Karim	12	15/01/1982	03/12/2009	GPS Bilazawi	GMS Salri Feroz Khel
19	284	Dalil Shah	12	04/01/1980	24/11/2009	GPS Bazed Khel	GMS Mir Meli Sheikhhan

(Signature)
District Education Officer
Orakzai District at Hangu

Regular

Posted

20	285	Talib Ur Rehman	12	20/05/1984	24/11/2009	GPS Jaba Koda	GMS Avi Melo
21	287	Gul Rahim	12	05/04/1979	24/11/2009	GPS Karap Samana	GMS Gulistan
22	288	Ashfaq Ali Maskeen Chan	12	18/03/1985	24/11/2009	GPS Khar Khushla	GMS Khalil Sapoy (Khura)
23	289	S.Khadim Hussain	12	10/04/1984	02/12/2009	GPS Toor Kon	GMS Damber Kasli
24	290		12	03/05/1985	24/11/2009	GPS Shamer	GMS And Khel
25	291	Rozes Akbar Hussain	12	16/02/1982	24/11/2009	GPS Zakhlan	GMS Dran Sheikhan
26	292	Ashraf Minawar	12	10/02/1981	24/11/2009	GPS Palasol	GMS Khalil Sapoy
27	293	Khan	12	10/05/1986	24/11/2009	GPS Injwar	GMS Saifal Dara
28	298	Hassan	12	09/10/1987	24/11/2009	GPS And Khel Bala	GMS Zera
29	300	Arnold Khan	12	18/02/1985	25/11/2009	GPS Ilitapi Al Khel	GMS Pankh Khel
30	302	Saqib Ul Islam	12	20/04/1986	24/11/2009	GPS Panjam All Khel	GMS Alwarha Melo
31	303	Arif ur Pehman	12	03/10/1982	24/11/2009	GPS Khadiza No.1	GMS Swara Kol
32	304	Hilmat Khan Munawar	12	02/10/1983	24/11/2009	GPS Sawara Kol	GMS Swara Kol
33	306	Khan	12	25/10/1982	24/11/2009	GPS Chopper Mishli	GMS Baber Laki
34	307	Muhammad Ghani	12	26/02/1985	24/11/2009	GPS Kol Ali Khel	GMS Damber Kasli
35	308	Painda Khan	12	13/04/1984	25/11/2009	GPS Yusuf Khe	GMS Bagh Nak
36	312	Izzat Khan	12	12/05/1986	24/11/2009	GPS Khadiza 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 increase 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

Encls No. 466/69 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

Serial No. 006837

Roll No. 1512

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Registration No.

2006-PGR-1137

Kohat University of Science & Technology, Kohat (Pakistan)

Session ANNUAL, 2009

AMIR UR REHMAN

SON

of

WAZIR BADSHAH

and a student

of ~~GRANZAK~~ AGENCY

having passed the prescribed

examination held in JULY 20 09, is this day admitted by

The Kohat University of Science & Technology, Kohat

to the Degree of

Bachelor of Arts

in the SECOND Division

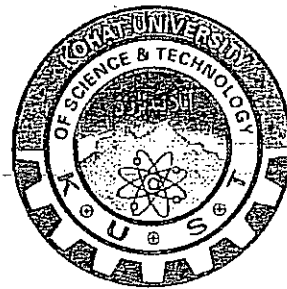
The Examination was taken as a whole / in parts

Controller of Examinations

Countersigned

M. Anwar

Vice Chancellor



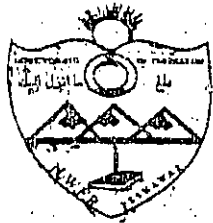
Result declared on OCTOBER 24, 2009

11-11-09

S.No. 210

-12

DIRECTORATE OF CURRICULUM & TEACHERS EDUCATION, NWFP, ABBOTTABAD



**DETAIL MARKS CERTIFICATE
DIPLOMA IN EDUCATION (2ND TERM)**

NAME: - AMIR UR REHMAN

SESSION: - 2006-07

FATHER'S NAME: - WAZIR BADSHAH

ROLL NO: - 189

Subjects: -	Maximum Marks	Marks Obtained		
		Internal	External	Total
1. Curriculum and Instructions	100	30	22	52
2. School Organization & Management	100	24	28	52
3. Testing, Evaluation & Basic Research	100	35	30	65
4. Teaching of Computer Science	100	36	45	81
5. Teaching of English	100	33	43	77
6. Teaching of Calligraphy/Art & Craft/Industrial Arts/Agriculture/Home Economics/Physical Education.	100	7	36	73
7. Teaching Practice	150	66	40	106
Total 2nd Term Marks: -	750			514
Total 1st Term Marks:	750			511
G. Total Marks: -	1500			1025

Note: Error/Omission excepted.

Failed/Passed: - Passed Division: - 1st

Prepared By _____

Checked By _____

Date of Declaration of Result _____

Theory Papers	Internal - 60%	External - 40%
Teaching Practice	Internal - 60%	External - 40%

Assistant Director
(Examinations)
N.W.F.P Peshawar

Assistant Education Officer
District Orakzai



"D" -13-

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

NO. 18811 DATED 11/04/2023

To

The District Education Officer,
Orakzai at Hangu.

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

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

In this regard, I am further directed to ask you to withdraw the Promotion Order of the mentioned CT, including 23 others earlier notified vide Dated 10-12-2020, as well as 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

Wahidullah
AD
26/3/23



-74-

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



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 19/05/22



OFFICE ORDER:

In compliance of the Directorate of Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar vide letter bearing No. 78811, dated 11-04-2022, 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 forty four promoted PSTs in BPS-12 to the posts of CTs 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.

S#	NAME	CURRENT PLACE OF POSTING	PLACE OF ADJUSTMENT
1.	Imam Hussain	GMS Sar Sam	GPS Dain Mola
2.	Khalifa Jan	GMS Saif Feroz Khel	GPS Star Jeda
3.	Muhammad Yaqoob	GMS Yaqub Kandori	GPS Gari Khel
4.	Muhammad Hanif	GMS Misha Bazar	GPS Bada Shekhan
5.	Museeb Rehman	GMS Babra Loati	GPS Gul Chert
6.	Gul Nazim	GMS Saif Feroz Khel	GPS Ghulak Ali Khel
7.	Dahir Shah	GMS Baid Khel	GPS Rangin Khel
8.	Mah Ur Rehman	GMS Avi Mola	GPS Dago Takhla
9.	Gul Rahim	GMS Gullistan	GPS Khea Kada
10.	Ashfaq Ali	GMS Khami Sepoy	GPS Bal Kol
11.	Masroor Khan	GMS Damber Lasti	GPS Dian Shalkhan
12.	Syed Khadim Hussain	GMS Amulhel	GMPS Shamer
13.	Rana Akbar	GMS Wambara	GPS Kagal Sher
14.	Hussain Asghar	GMS Khaji Sepoy	GPS Khar Khuchbi
15.	Munawar Khan	GMS Gailal Darrahi	GPS Akhla Kili
16.	Ghina Hassan	GMS Mirako Payam	GPS Suleman Khel
17.	Amjad Khan	GMS Zaira Khel	GPS Tagnal
18.	Saib Ullah	GMS Jarma District Kham	Will be adjusted as and when the info. is received, transfer to withdraw by the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa
19.	Amir ur Rehman	GMS Swaro Kol	GPS Swaro Kol
20.	Hikmat Khan	GMS Swaro Kol	GPS Khodzei No. 1
21.	Munawar Khan	GMS Chupper Mishli	GPS Zar Chappdi
22.	Muhammad Ghani	GMS Star Kada	Kol Ali Khel
23.	Panda Khan	GMS Bantmak	Ghulak Ali Khel
24.	Israfil Khan	GMS Dana Khula	GPS Totapi Ali Khel

Note:

- 1) Fresh charge report in their original Basic Pay Scales as on 09-12-2020 should be submitted to an 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 /to S# 18, already transferred to District Khaml vide Directorate of E&SE KP No. 13822-B/1/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 Khaml.
- 4) District Monitoring Officer, EMA, 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 letter quoted above.
- 8) Principal/Head Master/Incharge HM and Head Teachers concerned.
- 9) EDOs concerned for further necessary action.
- 10) Superintendent Pay Clerk, D/O the DEO (M) Orakzai for further necessary action.
- 11) POTS concerned.
- 12) Official Copy.

DISTRICT EDUCATION OFFICER (MALE)
 DISTRICT ORAKZAI

خدمتِ عذاب ڈسٹرکٹ ایجوکیشن آفیسر ضلع اور کسٹی

عذاب عالی 16-94

اپنا احوال
ڈی آئی او

عنوان - ریٹرنیٹی اپیل برائے ڈیگریڈیشن آرڈر

گزارش حضور وزیر ہے کہ ہزار آرڈر بطور PST (2009/11/23) کو

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

پر پیش دیا گیا۔ چونکہ فاٹا میں SPST (14 سکیں) کا کوئی پوسٹ نہیں ہے۔

یہ اساتذہ PSHT (15 سکیں) کے بھی حقدار تھے، چونکہ فاٹا میں CT رسمی اساتذہ

زیادہ خالی تھیں PSHT (15 سکیں) نہ ہوئے پیرا ان اساتذہ کو CT پر پوزیشن

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

عذاب دالہ - اب ڈسٹریکٹ میں CT پوزیشن کے بعد ان اساتذہ کو CT (15 سکیں) سے دوبارہ

PST (2 سکیں) پر ڈیگریڈ کیا گیا۔

لہذا اب صاحبان کی شان اتریس میں گزارا جائیگا ہے۔ کہ اس ڈیگریڈ آرڈر

پر ریٹرنیٹی کر کے سائٹیں کو اضااف دے کر شکور فرمائیں۔

مورن 20/05/2023 میں نوازش ہوگی

copy to

1- ڈی آئی او اور کسٹی

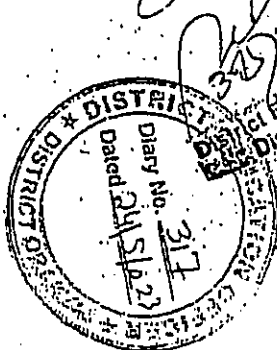
2- ڈی آئی او اور کسٹی

3- ڈائریکٹر آف ایجوکیشن اینڈ

سنڈری ایجوکیشن

4- سیکرٹری ایجوکیشن کے پی کے

الگارہین
DPC-2020
PST to CT
All teachers



1 (1) Shahid شہید الاسلام

2 (2) M. M. Khan منور خان

3 (3) Aamir امیر خان

4 (4) M. M. Khan منور خان

5 (5) A. A. Khan اقبال خان

6 (6) A. A. Khan اقبال علی

7 (7) M. M. Khan محمد یعقوب

8 (8) Danial دلپوش شاہ

9 (9) M. M. Khan مکی خان

10 (10) M. M. Khan شہین خان

11 (11) M. M. Khan محمد علی

12 (12) M. M. Khan امیر خان

13 (13) P. M. Khan پانڈے خان

14 (14) M. M. Khan امیر خان

15 (15) M. M. Khan منور خان

16 (16) M. M. Khan منور خان

17 (17) M. M. Khan منور خان

18 (18) M. M. Khan منور خان

19 (19) M. M. Khan منور خان

20 (20) M. M. Khan منور خان

21 (21) M. M. Khan منور خان

22 (22) M. M. Khan منور خان

23 (23) M. M. Khan منور خان

24 (24) M. M. Khan منور خان

-16/B-

'F/2'



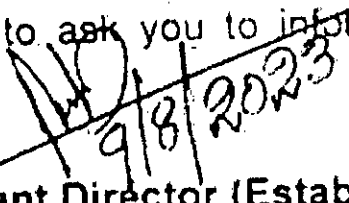
SECONDARY EDUCATION KHYBER
PAKHTUNKHWA PESHAWAR
P.NO. 61/DISTRICT CADRE TRANSFERS
NO. 22904 DATED 09-08/2023

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.


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

Ameez Rahman

(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. / /2023

CLIENT

[Signature]

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