


# FORM OF ORDER SHEET

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

**Appeal No.** 1692/2023


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. Saqib Ul Islam 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. Saqib Islam CT, GMS Alwarha Mala 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. 1630 /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-16. So far as the rejection/appellate order is concerned, the same has not been issued to the appellant rather the same has been issued/written on the face of departmental appeal 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  
Adv.  
9/6/23

1731

12/6/23

No 1860 / ST  
04-07-2023

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

APPEAL NO. 1692 /2023

SAQIB UL ISLAM

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. 1692 /2023**

Mr. Saqib Ul Islam, CT (BPS-15),  
GMS Alwarha Mala, 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 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 05.05.2023 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 05.05.2023 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  
**SAQIB UL ISLAM**

Through:


  
**NOOR MOHAMMAD KHATTAK**  
ADVOCATE SUPREME COURT

  
**KAMRAN KHAN**

  
**UMAR FAROOQ**

  
**MUHAMMAD AYUB**

  
**WALEED ADNAN**

  
**MAHMOOD JAN**  
Advocates, Peshawar

**AFFIDAVIT**

I, Saqib Ul Islam, CT (BPS-15), GMS Alwarha Mala, 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

SAQIB UL ISLAM

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 0925-690017 FAX 0925-690517

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. 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. Kauser 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	R.P.S.	Date of Birth	Regular Service	Place of Posting	Remarks
1	Zeenat Ali	14	03/02/1970	01/03/1993	GPS Naar Ali Garhi	
2	Adeel Hussain	15	01/08/1970	23/05/1995	GPS Garhi Mani Khel	
3	Hussainullah	15	13/02/1972	31/03/2001	GPS Khawas Khel	
4	Ali Akhbar	15	05/05/1970	01/09/2003	GPS Sarka	
5	Yasin Ullah	15	02/01/1980	01/09/2003	GPS Saria Mishri	
6	Shah	15	19/03/1982	01/10/2001	GPS Sarki Khel	
7	Adeel Shakoor	15	01/03/1972	23/10/2003	GPS Sama Mawazai	
8	Samar Gul	15	01/01/1979	29/07/2004	GPS Saugra	
9	Koboom	15	05/08/1979	03/05/2004	GPS Tarapi Ali Khel	
10	Umer	15	22/04/1976	03/09/2005	GPS Ramhie Salai	
11	Mir Asghar	15	16/10/1984	05/09/2005	GPS Khangar Boor	
12	Wahed Ullah	15	02/02/1979	23/10/2005	GPS Bhand Khel No.2	
13	Iqbal Hussain	12	05/05/1985	24/11/2009	GPS Ster Sam	
14	Khaista Jan	12	01/03/1986	24/11/2009	GPS Mfir Kalam Khel	
15	Muhammad Yaqoob	12	09/03/1987	24/11/2009	GPS Malang garhi	
16	Muhammad Hanif	12	21/12/1982	24/11/2009	GPS Bado Sheikhani	
17	Naseeb Rehman	12	05/10/1985	24/11/2009	GPS Gul Cheri	
18	Gul Karim	12	15/01/1983	03/12/2009	GPS Bilazawi	
19	Dahl Shah	12	04/04/1980	24/11/2009	GPS Bazed Khel	
20	Mauli Ur Rehman	12	20/05/1984	24/11/2009	GPS Jahn Kado	
21	Gul Rahim	12	03/04/1979	24/11/2009	GPS Karapa Samana	
22	Ashfaq Ali	12	18/05/1985	24/11/2009	GPS Khar Khushia	
23	Moskeen Khan	12	10/04/1984	02/12/2009	GPS Taor Kant	
24	S Khadim Hussain	12	03/05/1985	24/11/2009	GPS Shamer	
25	Baqer Akbar Hussain	12	16/02/1982	24/11/2009	GPS Zakhtan	
26	Asghar Minawar Khan	12	10/02/1981	24/11/2009	GPS Palansi	
27	Khan	12	10/05/1986	24/11/2009	GPS Injwar	
28	Shorin Hussain	12	09/10/1987	24/11/2009	GPS And Khel Bala	
29	Ajmal Khan	12	18/02/1985	25/11/2009	GPS Barapi Ali Khel	
30	Saqib Ullah Islam	12	20/04/1986	24/11/2009	GPS Panjam Ali Khel	

- 6 -

303	Anir ur Rehman	12	03/10/1982	24/11/2009	GPS Khadizai No.1
304	Hikmat Khan Munawar	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
308	Painda Khan	12	13/04/1984	25/11/2009	GPS Yusuf Khel
312	Israjil Khan	12	12/05/1986	24/11/2009	GPS Khadizai No.2

No. of PST/SPST/PSHT (Male) to CT cleared for promotion = 36

No. of CT (male) deferred for promotion = NIL

The meeting ended with a vote of thanks to and from the chair.

1. Wahid Ullah  
SCT GMS Bagara Mishli  
Member

3. Mr. Abdul Wajid  
ADEO Orakzai  
Member

5. Mrs. Nabila Naz  
ADEO Orakzai  
Member

7. Mr. Rals Khan  
ADEO Orakzai  
Member

9. Faramed Ullah Jan  
Additional Director NMD,  
KP ESSED Representative

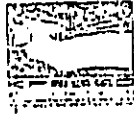
2. Shakeel Ahmed  
SST GMS Swara Kot  
Member

4. Kausar Ali  
ADEO Orakzai  
Member

6. Muhammad Inayat (HM)  
GHS Mishli Bazar  
Member

8. Sarf Ullah Principal  
GHS Mandati  
Member

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



District Education Office  
District Orakzai

4B  
No. 6660  
Date 10/12/2020

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	Jagan Ali	15	05/02/1970	01/03/1993	GPS Noor Ali 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 Khawaz Khel	GMS Akwaro M. G
4	159	Akmal Khan	15	05/03/1979	01/09/2003	GPS Sarka Aakhe	GMS Tooli Bagh, Orakzai
5	160	Yasin Ullah	15	02/01/1980	01/09/2003	GPS Sarla Mishli	GMS Mishli Pagar
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 Dron Shakhlan
8	142	Sajjad Gul	15	01/01/1979	29/07/2004	GPS Sangra	GMS Mishli
9	170	Fayyaz	15	05/06/1979	03/08/2004	GPS Tarapi A. Khel	GMS Sarki Khel
10	175	Muhammad Umer	15	22/04/1976	07/09/2005	GPS Rambic Salai	GMS Guklan
11	218	Muhammad Zahed Ullah	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	222	Kamal Hussain	12	05/05/1985	24/11/2009	GPS Star Sam	GMS Star Sam
14	278	Amrita Jan	12	01/03/1986	24/11/2009	GPS Mir Kalam Khel	GMS Gasim Khel, Orakzai
15	279	Muhammad Zaqoob	12	09/03/1987	24/11/2009	GPS Malang Garhi	GMS Yakho Kondaw
16	280	Muhammad Hanif	12	21/12/1982	24/11/2009	GPS Bado Shakhlan	GMS Mishli Bazar
17	282	Maseeb Behman	12	05/10/1985	24/11/2009	GPS Gul Cher	GMS Babero Lari
18	283	Gul Karim	12	15/01/1982	03/12/2009	GPS Bilozawi	GMS Sali Feroz Khel
19	284	Dalir Shah	12	04/04/1980	24/11/2009	GPS Bazed Khel	GMS Mir Meher Shakhlan

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

Regulation Post-Test

20	285	Mali Ur. Fehman	12	20/05/1984	24/11/2009	GPS Jaba Kado	GHS Avi Melo
21	287	Gul Rahim	12	05/04/1979	24/11/2009	GPS Korapa Samana	GHS Gulistan
22	288	Ashfaq Ali	12	17/03/1985	24/11/2009	GPS Khar Khushla	GMS Khalil Sepoy (Khura)
23	289	Maskeen Khan	12	10/04/1984	02/12/2009	GPS Taor Kani	GMS Damber Lasli
24	290	S. Khadim Hussain	12	03/05/1985	24/11/2009	GPS Shamer	GHS And Khel
25	291	Raees Akbar	12	16/02/1982	24/11/2009	GPS Zakhlan	GHS Dron Sheikhhan
26	292	Hussain Ayubhar	12	10/02/1981	24/11/2009	GPS Paloasi	GMS Khalil Sepoy
27	295	Minawar Khan	12	10/05/1986	24/11/2009	GPS Injwar	GHS Saifal Dara
28	298	Muhamm Hassan	12	09/10/1987	24/11/2009	GPS And Khel Bala	GMS Zoro
29	300	Arifad Khan	12	10/02/1985	25/11/2009	GPS Ilirapli Ali Khel	GMS Banki Khel
30	302	Saib Ullah	12	20/04/1986	24/11/2009	GPS Panjam Ali Khel	GMS Alwarha Melo
31	303	Arif ur Rehman	12	03/10/1982	24/11/2009	GPS Khadizai No.1	GHS Swara Kol
32	304	Hikmat Khan	12	02/10/1983	24/11/2009	GPS Sowara Kol	GHS Swara Kol
33	306	Munawar Khan	12	25/10/1982	24/11/2009	GPS Chapper Mishli	GMS Baberg Laki
34	307	Muhammad Ghani	12	26/02/1985	24/11/2009	GPS Kol Ali Khel	GMS Damber Lasli
35	308	Painda Khan	12	13/04/1984	25/11/2009	GPS Yusuf Khel	GHS Bagh Naki
36	312	Ibrahim Khan	12	12/05/1986	24/11/2009	GPS Khadizai No.2	GMS Dara 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-Sr seniority on lower post will remain intact.
6. No TA/DA is allowed for joining his duty.
7. They will give an under taking to be recorded in their service book to the effect that if any over payment is made to him in light this order will be recovered and if he is wrongly promoted he will be reversed.

DISTRICT EDUCATION OFFICER  
DISTRICT ORAKZAI

Endst No 666/69 dated: 10/12/2020

Copy forwarded for information and necessary action to the  
Director Education (E&SE) Khyber Pakhtunkhwa Peshawar.

-10-

2. Deputy Commissioner, Orakzai.
3. District Monitoring Officer, Orakzai.
4. District Account Officer District Orakzai.
5. PS to the Secretary to Govt Khyber Pakhtunkhwa E& SE Department, Peshawar
6. PA to the Director (E&SE) Khyber Pakhtunkhwa Peshawar.
7. Accountant Local Office, Orakzai.
8. Teacher concerned.
9. Master File

~~Signature~~  
DISTRICT EDUCATION OFFICER  
DISTRICT ORAKZAI

Serial No. 00007b

Roll No. 5275

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Registration No.  
2005-K-185

**Kohat University**  
of Science & Technology, Kohat  
(Pakistan)

Session 2006-2008

SAQIB UL ISLAM

SON of JALAT KHAN

and a student

of GOVT POST GRADUATE COLLEGE, KOHAT

having passed the prescribed

examination held in

JANUARY, 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 ~~whole~~ / in parts

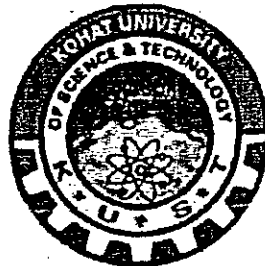
  
Controller of Examinations

Countersigned



Vice Chancellor

Results declared on MAY 02, 2009





"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 PSI (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*

*ADP  
26/5/23*



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 08/11/2023



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 Orakzal 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 Orakzal 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 their 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 Orakzal 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, Orakzal.
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)





OFFICE OF THE DISTRICT EDUCATION OFFICER (M)-ORAKZAI  
 DISTRICT HEADQUARTER ORAKZAI AT BABER MELA, ANGU  
 Phone # 0925-690017 Fax: # 0925-690017  
 Email: deoorakzai2020@gmail.com



No. 141 Dated 19/05/2023

**OFFICE ORDER:**

In compliance of the Directorate of Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar vide letter bearing No. 10811, dated 11-04-2022, the competent authority DEO (M) Orakzai is pleased to withdraw the promotion orders bearing Encls: No. 6660, dated 10-12-2020 in respect of the following twenty four promoted PSTs in BPS-12 to the posts of CTs in BPS-15 in District Orakzai of the promotion order dated. Furthermore, the following teachers are hereby adjusted in the schools mentioned against their names with immediate effect.

Sl#	NAME	CURRENT PLACE OF POSTING	PLACE OF ADJUSTMENT
1.	Iqbal Hussain	GMS Star Sam	GPS Baba Mela
2.	Khafila Jan	GMS Sairi Feroz Khel	GPS Stars Koda
3.	Muhammad Yaqoob	GMS Yakho Kandow	GPS Sairi Khel
4.	Muhammad Hanif	GMS Kishu Bazar	GPS Bado Shekhar
5.	Naseeb Rehman	GMS Babra Laski	GPS Gul Chitral
6.	Gul Karim	GMS Sairi Feroz Khel	GPS Ghulak Ali Khel
7.	Dalik Shah	GMS Bazid Khel	GPS Rangin Khel
8.	Mall Ur Rehman	GMS Ari Mela	GPS Dago Takhta
9.	Gul Rahim	GMS Gullistan	GPS Khaw Kadda No.1
10.	Ashfaq Ali	GMS Khanj Sepoy	GPS Bal Kot
11.	Maskeen Khan	GMS Damber Lasli	GPS Dran Shokhlan
12.	Syed Khadim Hussain	GHSS Anrdkhal	GNPS Shemer
13.	Rnoos Akbar	GMS Wampana	GPS Kagnal Sher Khel
14.	Hussain Aghar	GMS Khanj Sepoy	GPS Khar Khushla
15.	Munawar Khan	GMS Sairi Damah	GPS Arko Kot
16.	Shiraz Hassan	GMS Miraka Payan	GPS Sileman Khel
17.	Amjad Khan	GMS Zanka Khel	GPS Tagheal
18.	Saqib Ul Islam	GMS Jama District Kohat	Will be adjusted as and when the inter district transfer withdrawn by the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa
19.	Amir ur Rehman	GMS Swaro Kot	GPS Swaro Kot
20.	Hifmat Khan	GMS Swaro Kot	GPS Khadizal No.1
21.	Munawar Khan	GMS Chapper Kishu	GPS Zar Chappdi
22.	Muhammad Ghani	GMS Stars Kada	Kot Ali Khel
23.	Parida Khani	GMS Baghmak	Ghulak Ali Khel
24.	Israfil Khan	GMS Dana Khela	GPS Tarapl Ali Khel

**Note:**

- 1) Fresh charge report in their original Basic Pay Scales as on 09-12-2020 should be submitted to me concerned within 15 days possibly. 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 file SP 18, already transferred to District Kohat vide Directorate of E&SE KP No. 13858-617/110-51 Transfers Dated Peshawar the 27/12/2022.
- 2) Additional Director (Estab), Directorate of E&SE, IAs, Peshawar
- 3) District Education Officer (M), District Peshawar
- 4) District Monitoring Officer, E&A, District Orakzai.
- 5) District Accounts Officer, District Orakzai
- 6) Deputy CEO (M), Orakzai.
- 7) Assistant Director (Estab), Directorate of E&SE, KP, Peshawar via his office letter quoted above.
- 8) Principal/Head Master/Incharge HM and HMI Teachers concerned.
- 9) DEOs concerned for further necessary action.
- 10) Superintendent Pay Clerk O/D the DEO (M) Orakzai for further necessary action.
- 11) District Education Officer (Male) Orakzai for his record.
- 12) Office Copy

DISTRICT EDUCATION OFFICER (MALE)  
 DISTRICT ORAKZAI

خدمت عذاب ڈسٹرکٹ ایجوکیشن آفیسر ضلع اورگنڈی

عذاب عالی ۹۴-۱۶

۱۱/۱۱/۲۰۰۹

عنوان - نظر ثانی اپیل برائے ڈیگریڈیشن آرڈر

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

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

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

یہ اساتذہ PST (15 سکیں) کے بھی حقدار تھے۔ چونکہ فاٹا میں CT سہی اساتذہ

زیادہ خالی تھیں۔ PSHT (15 سکیں) نہ ہوئے پیران اساتذہ کو CT پر پروموشن

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

عذاب والد۔ اب ڈھائی سال CT پر گزارنے کے بعد ان اساتذہ کو CT (15 سکیں) سے دوبارہ

PST (2 سکیں) پر ڈیگریڈ کیا گیا۔

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

پر نظر ثانی کر کے سائٹین کو اوصاف دہ کر شکور فرمائیں۔

میں گزارش ہوگی۔ مورخہ 20/05/2023

copy to

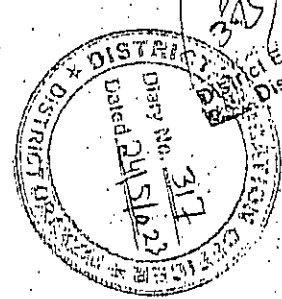
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2 - ڈی ای او اورگنڈی

3 - ڈائریکٹر آف ایلیمنٹری اینڈ

سنڈری ایجوکیشن

4 - سیکرٹری ایجوکیشن کے پی کے



DPC-2020

PST to CT

All teachers

۹۱۷

Sajid 1) نائب الامام

Jamali 14) امير افغان

M. milk 2) منور افغان

Khanjari 15) فاضل افغان

Ahmed 3) احمد افغان

Farid 16) فريد افغان

Shah 4) شاه افغان

M. Iqbal 17) منور افغان

Ahmed 5) احمد افغان

~~Farid~~ 18) فريد افغان

Ahmed 6) احمد افغان

M. Iqbal 19) منور افغان

M. Iqbal 7) منور افغان

M. Iqbal 20) منور افغان

M. Iqbal 8) منور افغان

M. Iqbal 21) منور افغان

M. Iqbal 9) منور افغان

M. Iqbal 22) منور افغان

M. Iqbal 10) منور افغان

M. Iqbal 23) منور افغان

M. Iqbal 11) منور افغان

M. Iqbal 12) منور افغان

M. Iqbal 13) منور افغان

-16/B-

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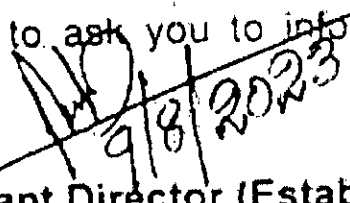
SECONDARY EDUCATION KHYBER  
PAKHTUNKHWA PESHAWAR  
P.NO. 61/DISTRICT CADRE TRANSFERS  
NO. 22904 DATED 09-08/2023

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

17

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

Appeal No 120 23

Sadiq-ul-Islam  
(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.      /      / 202

**CLIENT** Sadiq-ul-Islam

**ACCEPTED**

**NOOR MOHAMMAD KHATTAK  
ADVOCATE SUPREME COURT**

Waleed  
**WALEED ADNAN**

Kamran  
**KAMRAN KHAN**

Umar  
**UMAR FAROOQ MOHMAND**

Muhammad  
**MUHAMMAD AYUB**

&

Mahmood  
**MAHMOOD JAN  
ADVOCATES**