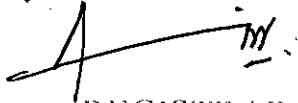


FORM OF ORDER SHEET

Court of _____

Appeal No. 1707/2023


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. Dalil Shah 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. Dalil Shah CT, GMS Mir Meta Sheikhan Orakzai received today 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. 1632 /S.T.

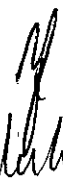
Dt. 9/6 /2023.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Noor Muhammad Khattak Adv.
High Court Peshawar.

R/sir, The Departmental appeal of the appellant is already annexed with the appeal at page No. 16. So far as the rejection/ Appellate Order is concerned, the same has not been issued to the appellant as a separate order, rather the same has been issued/written on the face of O/A which is available at annex F page 16.

In light of the above the instant appeal may kindly be placed before the Honble Bench for consideration.


Noor Muhammad Khattak
Adv

1731

12/8/23

No 1860/ST
04-07-2023

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

APPEAL NO. 1707 /2023

DALIL SHAH

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

-/-

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL NO. 1707 /2023

Mr. Dalil Shah, CT (BPS-15),
GMS Mir Meta Sheikhan, 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 09.08.2023 as noted 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


DALIL SHAH

Through:


NOOR MOHAMMAD KHATTAK


KAMRAN KHAN


UMAR FAROOQ


MUHAMMAD AYUB


WALEED ADNAN


MAHMOOD JAN
Advocates, Peshawar

AFFIDAVIT

I, Dalil Shah, CT (BPS-15), GMS Mir Meta Sheikhan, 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

DALIL SHAH

VS

EDUCATION DEPTT.

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: 35/19

Phone 0925-690017 FAX 0925-690017

Dated 24/10/2020

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 | (K.T.S&SD 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. I. #	Name of teacher	RP S	Date of Birth	Regular Service	Place of Posting	Remarks
1	36	Zeenat Ali	15	05/02/1970	01/03/1993	GPS Noor Ali Garhi	
2	66	Amal Hassan	15	01/08/1970	23/05/1995	GPS Garhi Mani Khel	
3	126	Hassanullah	15	13/02/1972	31/03/2001	GPS Khawas Khel	
4	159	Ali Najam	15	05/03/1979	01/09/2003	GPS Sarka Aakhel	
5	160	Yasin Ullah	15	02/01/1980	01/09/2003	GPS Sarla Mishi	
6	161	Ahmadwar Shah	15	10/03/1982	01/10/2003	GPS Sorkh Khel	
7	166	Abdul Shakaor	15	01/03/1972	23/10/2003	GPS Sama Mamozai	
8	169	Samar Gul	15	01/01/1979	29/07/2004	GPS Sangra	
9	170	Kh. Ali ur Rehman	15	05/06/1979	03/08/2004	GPS Taropi Ali Khel	
10	178	Muhammad Umer	15	22-04/1975	03/09/2005	GPS Rambic Salal	
11	218	Mir Asghar	15	16/10/1984	05/09/2005	GPS Khangar Boor	
12	219	Wahed Ullah	15	02/02/1979	23/10/2005	GPS Biland Khel No. 2	
13	277	Iqbal Hussain	12	05/05/1985	24/11/2009	GPS Ster Sam	
14	278	Khairat Jan	12	01/03/1986	24/11/2009	GPS Mir Kalam Khel	
15	279	Muhammad Yaqoob	12	09/03/1987	24/11/2009	GPS Malang garhi	
16	280	Hamid Noyceeb	12	21/12/1982	24/11/2009	GPS Bada Shukhan	
17	282	Rehman	12	05/10/1985	24/11/2009	GPS Gul Cheri	
18	283	Gul Karim	12	15/01/1982	03/12/2009	GPS Billaawl	
19	284	Dabi Shah	12	01/04/1980	24/11/2009	GPS Bazed Khel	
20	285	Rehman	12	20/05/1984	24/11/2009	GPS Jaha Kado	
21	287	Gul Robim	12	05/03/1979	24/11/2009	GPS Karapn Samana	
22	288	Ashfaq Ali	12	18/03/1985	24/11/2009	GPS Khar Khushia	
23	289	Mohyudin Khan	12	10/04/1984	02/12/2009	GPS Toor Kani	
24	290	Hussain	12	05/05/1985	24/11/2009	GPS Shamer	
25	291	Abey Umar	12	16/02/1982	24/11/2009	GPS Zakhim	
26	295	Ishtiaq	12	10/02/1981	24/11/2009	GPS Palansi	
27	295	Sham	12	10/03/1986	24/11/2009	GPS Injaur	
28	295	Shamir Hassan	12	09/04/1987	24/11/2009	GPS And Khel Balu	
29	300	Abbas Khan	12	18/02/1985	23/11/2009	GPS Heropi Ali Khel	
30	302	Sayid Ullah	12	20/04/1986	24/11/2009	GPS Panyani Ali Khel	

-3-6-

- 8-7-

303	Rehman	12	02/02/1983	24/11/2009	GPS Khadizai No.1
304	Hakmat Khan Khanawar	12	02/10/1983	24/11/2009	GPS Sawara Kot GPS Chapper Mishli
306	Khan	12	25/10/1983	24/11/2009	
307	Muhammad Ghani	12	26/02/1985	24/11/2009	GPS Kot Ali Khel
308	Painde Khan	12	13/04/1984	25/11/2009	GPS Yusuf Khel
312	Israfil Khan	12	12/05/1986	24/11/2009	GPS Khadizai No.2

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

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

1. Wahid Ullah
SCT GMS Bagara Mishli
Member

2. Shakeel Ahmad
SST GHS Swara Kot
Member

3. Mr. Abdul Malik
ADEO Orakzai
Member

4. Kausar Ali
ADEO Orakzai
Member

5. Mrs. Nahila Naz
ADEO Orakzai
Member

6. Muhammad Iqbal (HM)
GHS Mishli Bazar
Member

7. Mr. Rais Khan
ADEO Orakzai
Member

8. Saif Ullah Principal
GHS Mandali
Member

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

Mr. Faheed Ullah Munsud
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	Loenal Ali	15	05/02/1970	01/03/1993	GPS Noor Ali Garhi	GMS Mirozai
2	65	Arnal Hassan	15	01/08/1970	23/05/1995	GPS Garhi Mani Khel	GHSS Kalaya
3	126	Hassanullah	15	13/02/1972	31/03/2001	GPS Khawas Khel	GMS Akwarha Meia
4	159	Abul Majid	15	05/03/1979	01/09/2003	GPS Sarki Aakhe	GMS Tooli Bagn, Orakzai
5	160	Yasin Ullah	15	02/01/1980	01/09/2003	GPS Sarki Mishli	GMS Mishli Bazar
6	161	Munawar Shah	15	10/03/1982	01/10/2003	GPS Sarki Khel	GMS Inzer Palli
7	165	Abdul Shakoor	15	01/03/1972	23/10/2003	GPS Sama Mamazai	GMS Dron Shaikhon
8	169	Samar Gul	15	01/01/1979	29/07/2004	GPS Sangra	GMS Mishli Bazar
9	175	Muhammad Umar	15	05/06/1979	03/08/2004	GPS Taropi Ali Khel	GMS Sarki Khel
10	178	Muhammad Umar	15	22/01/1976	03/09/2005	GPS Rarnbic Salai	GMS Gulistan
11	218	Mir Asghar Wahed Ullah	15	16/10/1981	05/09/2005	GPS Khongar Bazar	GMS Sarki Khel
12	219	Muhammad Habib Hussain	15	02/02/1979	23/10/2005	GPS Biland Khel No.2	GMS Biland Khel
13	227	Muhammad Habib Hussain	12	05/05/1985	24/11/2009	GPS Star Sam Khel	GMS Star Sam
14	278	Muhammad Habib Hussain	12	01/03/1986	24/11/2009	GPS Mir Kalam Khel	GMS Qasim Khel, Orakzai
15	279	Muhammad Habib Hussain	12	09/03/1987	24/11/2009	GPS Malang Garhi	GMS Yakha Kandaw
16	280	Muhammad Habib Hussain	12	21/12/1987	24/11/2009	GPS Bada Shaikhon	GMS Mishli Bazar
17	282	Maseeb Fehman	12	05/10/1985	24/11/2009	GPS Gul Cheri	GMS Babera Lasi
18	283	Gul Karim	12	15/01/1982	03/12/2009	GPS Bilozawi Khel	GMS Saffi Feroz Khel
19	284	Dalit Shah	12	04/01/1980	24/11/2009	GPS Bared Khel	GMS Mir Meizi Shaikhon

District Education Officer
Orakzai District, at Hangu

Recd

Post Recd

20	285	Mali Ur Fehman	12	20/05/1984	24/11/2009	GPS Jaba Kada	GHS Avi Melo
21	287	Gul Rohim	12	05/04/1979	24/11/2009	GPS Karap Samana	GHS Gulistan
22	288	Ashfaq Ali	12	18/03/1985	24/11/2009	GPS Khar Khushlo	GMS Khalil Sepoy (Khura)
23	289	Maskeen Khan	12	10/04/1984	02/12/2009	GPS Toor Ka	GMS Damber Lassi
24	290	S. Khadim Hussain	12	03/05/1985	24/11/2009	GPS Shama	GHS And Khel
25	291	Baees Akbar	12	16/02/1982	24/11/2009	GPS Takhan	GHS Dhan Sneikhan
26	293	Hussain Aghar	12	10/02/1981	24/11/2009	GPS Palas	GMS Khalil Sepoy
27	295	Minawar Khan	12	10/05/1986	24/11/2009	GPS Injowar	GHS Saifal Dara
28	298	Hassan	12	09/10/1987	24/11/2009	GPS And Khel Bal	GMS Zera
29	300	Amjad Khan	12	18/02/1985	25/11/2009	GPS Burap Ali Khel	GMS Zanku Khel
30	302	Saqib Ul Khan	12	20/04/1986	24/11/2009	GPS Panjam Ali Khel	GMS Alwarha Mela
31	303	Amir ur Fehman	12	03/10/1982	24/11/2009	GPS Khadizal No.1	GHS Swara Kol
32	304	Hikmat Khan	12	02/10/1983	24/11/2009	GPS Sawara Kol	GHS Swara Kol
33	306	Minawar Khan	12	25/10/1982	24/11/2009	GPS Choppe Mishil	GMS Babe'a Lati
34	307	Munammad Ghani	12	26/02/1985	24/11/2009	GPS Kol Ali Khel	GMS Damber Lassi
35	308	Palma Khan	12	13/04/1984	25/11/2009	GPS Yusuf Khel	GHS Bagh Naki
36	312	Mali 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. Their inter-Ss 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**

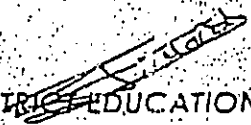
Encls: No. 6661-69 dated: 10/12/2020

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.


DISTRICT EDUCATION OFFICER
DISTRICT ORAKZAI

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

University of Peshawar
(Pakistan)

Session ANNUAL 2004

11-
10
C

RAJUL SHAH

Son / Daughter of

MACHSUNAT SHAH

and a Student / private candidate of DISTRICT ACHAT

having passed the prescribed examination held in JUNE 2004

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

Bachelor of Arts

in SECOND Division

The Examination was taken as a whole in parts

Serial No 101242

Registration No- 2005-10-6536

Roll Number 7577

Result declared on JUNE 30, 2005



[Signature]
Registrar

Countersigned
[Signature]
Vice-Chancellor

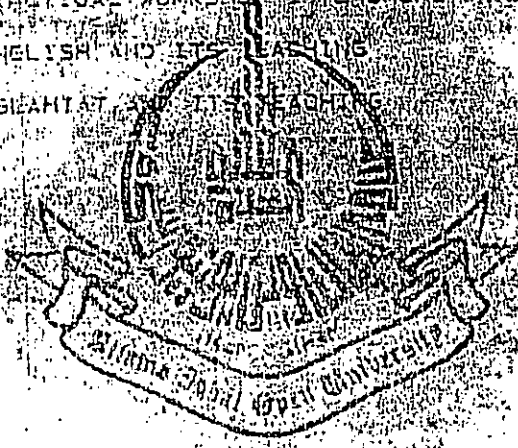
ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD
PROVISIONAL RESULT CARD



Name: **DALE SHAH** Roll No. **563254**
 Father's Name: **MARHUMAT SHAH** Registration No. **05A010087**
 Address: **FEROZ KHAN MELAN GOVT HIGH SCHOOL** Final Semester: **SPR-2007**
 Tehsil: **LABIA MALA TOWER**
 District: **GRAINAY AGENCY**
 has successfully completed **100%** OF TEACHING

The detail of passed courses are as under:

Semester	Course Code	Title of Course	Obtained Marks	
			Maximum	Obtained
AUT-05	0221	DIMENSIONS OF EDUCATION	100	54
AUT-05	0222	EDUCATIONAL PSYCHOLOGY	100	53
AUT-05	0223	SCHOOL ORGANIZATION	100	57
AUT-05	0225	TEACHING STRATEGIES & EVALUATION	100	57
AUT-05	0404	URDU LANGUAGE AND ITS TEACHING	100	62
SPR-06	0605	SOCIAL STUDIES & ITS TEACHING	100	53
SPR-06	0527	PRACTICAL WORKSHOP IN TEACHING PRACTICE	100	75
SPR-06	0604	ENGLISH AND ITS TEACHING	100	49
SPR-06	0625	ISLAHAT AND ITS TEACHING	100	56



CREDITS: 5

Total Marks / Obtained: 100 / 563

Percentage / Grade: 56.3 / B

Result Declared on: **MARCH 23, 2007**

Date of Issue: **MARCH 24, 2007**

[Signature]
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 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.



40-13-
DIRECTORATE OF ELEMENTARY &
SECONDARY EDUCATION, KHYBER
PAKHTUNKHWA, PESHAWAR
P. NO: 61/GENERAL TRANSFER

NO. 188/U 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: P.S.T (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.

11/04/2023
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
76/3/23



- 14 -

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



No. 1344 Dated 09/05/23

To, Director,
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.

Subject: - REQUEST FOR REVIEW/APPRaisal

Reference to the Assistant Director (Estab), Elementary & Secondary Education, Khyber Pakhtunkhwa office letter bearing No. 18811, dated 11/04/2023 wherein it has been directed to withdraw the promotion order of twenty four/24 PSTs BPS: 12 to CT BPS: 15 in District Orakzai issued vide Notification of this office bearing No. 6660, dated 10-12-2020 to the extent of Serial No. 15 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 EPS: 14 for promotion of these PSTs.
- 3) WHEREAS, in case of availability of the sanctioned posts of SPST in EPS: 14, these promoted PSTs would have been eligible for promotion to the posts of SPST BPS: 14 prior to this promotion way back in 2014 as per service rules 2012.
- 4) WHEREAS, there was no other eligible willing senior candidate than the promoted PSTs for promotion to the posts of CT BPS: 15.
- 5) WHEREAS, 60 posts of CT in BPS: 15 (Male) in district Orakzai were lying vacant at the time of DPC in 2020 and those PSTs in BPS: 12 have been promoted under Service Rules 2012 the 60% share of SPS/PSHT to the posts of CT in BPS: 15.
- 6) WHEREAS, the promoted PSTs had already been served on the posts of CTs in BPS: 15 since 11/12/2020 and one of the promoted PST (Mr. Saqib ul Islam) has already obtained the inter district transfer/NOC and serving in District Kohat on the post of CT in BPS: 15.

In the light of above, letter issued by your esteemed office dated 11/04/2023 may be reviewed in the interest of public service and to avoid any litigation, please.

DISTRICT EDUCATION OFFICER-(M)

ORAKZAI

Copy of Even No. & Date:

Copy forwarded for information and necessary action to the:-

1. Deputy Commissioner, Orakzai.
2. Additional Director (Estab), Directorate of E&SE, MAs, Khyber Pakhtunkhwa, Peshawar.
3. Assistant Director (Estab), Directorate of E&SE, Khyber Pakhtunkhwa w.r.t his office letter vide cited above.
4. Office Copy.

DISTRICT EDUCATION OFFICER-(M)

ORAKZAI



7E - 15

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



No. 411 Dated 19/05/2023

OFFICE ORDER:

In compliance of the Directorate of Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar vide letter bearing No. 18811, dated 11-04-2023, 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 promulgated order dated. Furthermore, the following teachers are hereby adjusted in the schools mentioned below, their names will have immediate effect.

Sl#	NAME	CURRENT PLACE OF POSTING	PLACE OF ADJUSTMENT
1.	Iqbal Hussain	GMS Star Sam	GPS Star Mela
2.	Khalista Jan	GMS Sahi Feroz Khel	GPS Star Mela
3.	Muhammad Yaqoob	GMS Yakhio Mandora	GPS Barki Khel
4.	Muhammad Hanif	GMS Mushu Bazar	GPS Bada Shal Khan
5.	Naseeb Rehman	GMS Babra Laski	GPS Gul Chahri
6.	Gul Karim	GMS Sahi Feroz Khel	GPS Gudar Ali Khel
7.	Dafiq Shah	GMS Barki Khel	GPS Rangin Khel
8.	Matt Ur Rehman	GMS Awi Mela	GPS Dago Takhial
9.	Gul Rahim	GMS Gulistan	GPS Khoo Koda No.
10.	Ashfaq Ali	GMS Khalil Sepoy	GPS Bai Kol
11.	Maskeen Khan	GMS Damber Lasti	GPS Dera Sheikhhan
12.	Syed Khadim Hussain	GHSS Andhel	GMPS Shezner
13.	Rasool Akbar	GMS Wamparva	GPS Kagal Sher Kol
14.	Hussain Asghar	GMS Khalil Sepoy	GPS Khar Khushla
15.	Munawar Khan	GMS Saital Darrah	GPS Arhio Khil
16.	Shiron Hassan	GMS Mirako Payan	GPS Sulman Khel
17.	Amjad Khan	GMS Zanka Khel	GPS Taghral
18.	Saqib Ali Islam	GMS Janna District Kohat	Will be adjusted as and when the inter-district transfer is withdrawn 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 Khadimi No.
21.	Munawar Khan	GMS Chopper Makhil	GPS Zar Chappal
22.	Muhammad Ghani	GMS Siara Koda	Kol AR Khel
23.	Pamda Khan	GMS Baghnal	Ghurat A. Khel
24.	Israfil Khan	GMS Dana Khuda	GPS Tarchi Khel

Note:

- 1) Fresh charge report in their original Basic Pay Scales as on 09-12-2020 should be submitted if concerned within 15 days proximately. 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 the Sl# 18, already transferred to District Kohat vide Directorate of E&SE KP No. 13628-B/17 No.51 Transfer Dated Peshawar the 27/12/2022.
- 2) Additional Director (Establish), Directorate of E&SE, MA, Peshawar
- 3) District Education Officer (M), District Orakzai
- 4) District Monitoring Officer, E&SE, District Orakzai
- 5) District Accounts Officer, District Orakzai
- 6) Deputy NEO (M), Orakzai
- 7) Assistant Director (Establish), Directorate of E&SE, KP, Peshawar vide his office letter quoted above.
- 8) Principal/Head Master/Incharge HM and HMI Teachers concerned.
- 9) EDOs concerned for further necessary action
- 10) Superintendent Pay Clerk, O/O the DEO (M) Orakzai for further necessary actions
- 11) District Education Officer (Male) Orakzai
- 12) District Education Officer (Male) Orakzai
- 13) Office Copy

5d
 DISTRICT EDUCATION OFFICER (MALE)
 DISTRICT ORAKZAI

خدمت خناب ڈیپارٹمنٹ ایجوکیشن آفیسر ضلع اورکڑی

۹۴-۱۶-۱۰ - خناب عالی

آئی ای او اورکڑی
۱۱/۱۱/۲۰۰۹

سرکاری - نظر ثانی ایمل برائے ڈیپارٹمنٹ آف ایجوکیشن

گزارش منظور ہو رہی 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 میں

پروموشن دیا گیا۔ چونکہ فائنا میں S.PST (14 سکین) کا کوئی پوسٹ نہیں ہے۔

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

زیادہ جالی تھیں۔ PSHT (15 سکین) نہ ہوئے ہیں ان اساتذہ کو CT میں پروموشن

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

خناب عالی۔ اب ڈھائی سال CT میں گزارنے کے بعد ان اساتذہ کو CT (15 سکین) سے دوبارہ

PST (12 سکین) میں ڈیپارٹمنٹ دیا گیا۔

لہذا اب صاحبان کی شان افسر میں گزارش کی جاتی ہے۔ کہ اس ڈیپارٹمنٹ آف ایجوکیشن

میں نظر ثانی کر کے سائٹیں کو الصاف رہ کر مشکور فرمائیں۔

میں گزارش ہوگی۔ مورخہ 20/05/2023

copy to

1 - ڈی سی اورکڑی

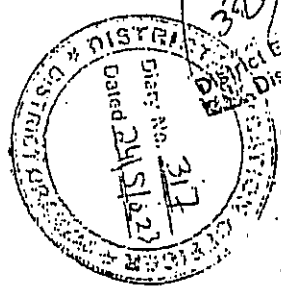
2 - ڈی ای او اورکڑی

3 - ڈائریکٹر آف ایجوکیشن ایمرٹ

سکڑی ایجوکیشن

4 - سیکرٹری ایجوکیشن کے پی کے

العاہدین
DPC-2020
PST to CT
All teachers



21/5

- 1. Sanjid شایب الاسلام
- 2. M. nulk منور خان
- 3. Aamir احمد خان
- 4. Shahid شہید
- 5. A. K. Iqbal اقبال حسین
- 6. A. A. I. افتخار علی
- 7. M. M. I. محمد یعقوب
- 8. Danial دلیل شاہ
- 9. M. M. I. مکنظن
- 10. M. M. I. شہین حسن
- 11. M. M. I. محمد اسحاق
- 12. A. M. I. امیر زمان
- 13. P. M. I. پانزہ خان
- 14. J. M. I. اسرار خان
- 15. K. M. I. کاشف خان
- 16. H. M. I. حفیظ خان
- 17. M. M. I. منور خان
- 18. M. M. I. محمد خان
- 19. M. M. I. مبین خان
- 20. M. M. I. مصیب خان
- 21. M. M. I. محمد عارف
- 22. M. M. I. گل نسیم
- 23. M. M. I. مطیع الرحمن

-16/B-

"F/1"



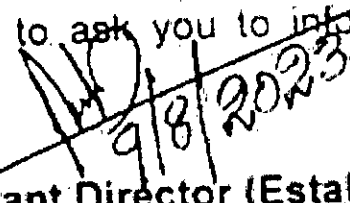
SECONDARY EDUCATION KHYBER
PAKHTUNKHWA PESHAWAR
P.NO. 61/DISTRICT CADRE TRANSFERS
NO. 22904 DATED 09-08/2023

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 12023

Daleel Shah

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Education Deptt

(RESPONDENT)
(DEFENDANT)

I/We ADPELLANT

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 Daleel

ACCEPTED

**NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT**

Waleed
WALEED ADNAN

Kamran
KAMRAN KHAN

Umar
UMAR FAROOQ MOHMAND

Muhamad
MUHAMMAD AYUB

&

Mahmood
**MAHMOOD JAN
ADVOCATES**

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