


FORM OF ORDER SHEET

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

Appeal No. 1687/2023

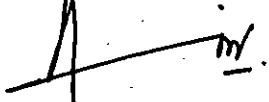
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	15/08/2023	<p>The appeal of Mr. Muhammad Ghani is re-submitted today by Mr. Noor Muhammad Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <u>24-08-2023</u>.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Muhammad Ghani CT GMS Damber Lasti Orakzai received today i.e. on 05.06.2023 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. 1650 /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 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 departmental appeal which is available at annexure - F, Page # 16.

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

1731  

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12/6/23

Noor Muhammad 9/6/23  
KTH

Asc No 1860/ST  
04-07-2023

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

APPEAL NO. 1687 /2023

MUHAMMAD GHANI

V/S

EDUCATION DEPTT:

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APPELLANT

Through:

**NOOR MOHAMMAD KHATTAK**  
ADVOCATE SUPREME COURT

- 1 -

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

**APPEAL NO. 1687 /2023**

Mr. Muhammad Ghani, CT (BPS-15),  
GMS Damber Lasti, 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 08-08-2023 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 08.08.2023 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 15.08.2023 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 15.08.2023 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

  
**MUHAMMAD GHANI**

Through:

  
**KAMRAN KHAN**  
**NOOR MOHAMMAD KHATTAK**  
**ADVOCATE SUPREME COURT**

  
**UMAR FAROOQ**

  
**MUHAMMAD AYUB**

  
**WALEED ADNAN**

  
**MAHMOOD JAN**  
Advocates, Peshawar

**AFFIDAVIT**

I, Muhammad Ghani, CT (BPS-15), GMS Damber Lasti, 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

**MUHAMMAD GHANI                      VS                      EDUCATION DEPT.**

**APPLICATION FOR SUSPENSION OF THE OPERATION OF THE**  
**ORDER DATED 19.05.2023 TILL THE DISPOSAL OF THE**  
**MENTIONED APPEAL.**

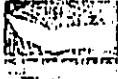
**R.SHEWETH:**

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 0923-690017 FAX 0923-690017

Date: 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. Haris Ullah Jan, Additional Director NMD              | (KPE&SD) Representative |
| 3. Mr Saf Ullah, Principal B-19 GHS Mandali District Orakzai | Member                  |
| 4. Mr Muhammad Iqbal, HM GHS Mishli Bazar                    | Member                  |
| 5. Kausar Ali, ADFO District Orakzai                         | Member                  |
| 6. Mr Abdul Abdul Malik, ADEO District Orakzai               | Member                  |
| 7. Mst. Nabila Naz, ADEO District Orakzai                    | Member                  |
| 8. Mr. Shakeel Ahmed, SST GHS Swaro Kot                      | Member                  |
| 9. Mr. Wahid Ullah, SCT GMS Bagara Mishli                    | Member                  |

The meeting started with recitation from the Holy Quran. The Chair welcomed the participants. The following items were discussed in detail by the DPC keeping in view all the aspects of the case and finally unanimously recommended the promotion of the following teachers on the vacant post with immediate effect.

Item No. 1 PROMOTION OF PST/SPST/PSHT (MALE) FROM TO CT BPS-15 ON REGULAR BASIS

The case of promotion of PST/SPST/PSHT (MALE) to CT BPS-15 against vacant posts was considered and the DPC recommended as under:

Total No. of CT (M) Vacant Post	60
60 % share of PST/SPST/PSHT Posts	36
Share of promotion 100%	36
Net to be Promoted	36
Available for promotion	36
Recommended for promotion to CT	36



S.L. #	Name of teacher	B.P.S	Date of Birth	Regular Service	Place of Posting	Remarks
1	16 Zeena Ali	15	03/02/1970	01/03/1993	GPS Naor Ali Garhi	
2	66 Anul Hassan	15	01/08/1970	23/05/1995	GPS Garhi Mani Khel	
3	126 Hossainullah	15	13/03/1972	31/03/2001	GPS Khawas Khel	
4	150 Mr. Muzam	15	05/03/1979	01/09/2003	GPS Sarka Ankhel	
5	150 Yasir Ullah	15	02/01/1980	01/09/2003	GPS Sarla Micht	
6	161 Shah	15	10/03/1982	01/10/2003	GPS Sarki Khel	
7	166 Abul Shukur	15	01/03/1972	23/10/2003	GPS Suma Manazai	
8	169 Sumar Gul Khattak	15	01/01/1979	29/07/2004	GPS Sangra	
9	170 Rehman Mohammed	15	05/06/1979	03/08/2004	GPS Taropi Ali Khel	
10	178 Umar	15	22/01/1976	03/09/2005	GPS Rambic Salal	
11	188 Mr. Asghar	15	16/10/1984	03/09/2005	GPS Khawar Bano	
12	216 W. G. J. Ullah	15	02/02/1979	23/10/2005	GPS Inland Khel No 2	
13	227 Iqbal Hussain	12	05/05/1983	24/11/2009	GPS Sier Sam	
14	228 Khawar Iqbal	12	01/03/1986	24/11/2009	GPS Mir Kalam Khel	
15	229 Yaqub Mohammed	12	09/03/1987	24/11/2009	GPS Malang garhi	
16	280 Hamid Nawaz	12	21/12/1982	24/11/2009	GPS Bada Sheikhhan	
17	282 Rehman	12	05/10/1983	24/11/2009	GPS Gul Chert	
18	283 Gul Karim	12	15/01/1982	03/12/2009	GPS Bilazawi	
19	284 Dabir Shah Akai Ue	12	04/04/1980	24/11/2009	GPS Bazed Khel	
20	285 Rehman	12	20/05/1984	24/11/2009	GPS Jahu Kada	
21	287 Gul Rahim	12	05/04/1979	24/11/2009	GPS Karapa Samana	
22	288 Ashfaq Ali	12	18/03/1985	24/11/2009	GPS Khar Khushita	
23	289 Muskeen Khan S. Khadim	12	10/04/1984	02/12/2009	GPS Taor Kaul	
24	290 Hussain	12	03/05/1983	24/11/2009	GPS Shamer	
25	291 Raza Akbar Hussain	12	15/02/1982	24/11/2009	GPS Zakhtan	
26	295 Ascher Minawar	12	10/02/1981	24/11/2009	GPS Paloori	
27	295 Khan	12	10/05/1986	24/11/2009	GPS Injavar	
28	298 Sherin Hassan	12	09/04/1987	24/11/2009	GPS And Khel Bala	
29	300 Anjani Khan Saqib Ue	12	18/02/1983	25/11/2009	GPS Beropi Ali Khel	
30	302 Islam	12	20/04/1986	24/11/2009	GPS Panjam Ali Khel	

31	303	Amir ul Rehman	12	03/10/1983	24/11/2009	GPS Khadizai No.1
32	304	Hikmat Khan Shwarwar	12	02/10/1983	24/11/2009	GPS Sawara Kot GPS Chapper Mishli
33	306	Muhammad Ghani	12	25/10/1983	24/11/2009	GPS Kot Ali Khel
34	307	Paluch Khan	12	13/04/1984	25/11/2009	GPS Yusuf Khel
35	308	Israjil Khan	12	12/03/1986	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. Nabila Naz  
ADEO Orakzai  
Member

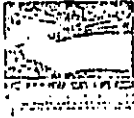
6. Muhammad Inzal (HM)  
GHS Mishli Bazar  
Member

7. Mr. Rals Khan  
ADEO Orakzai  
Member

8. Saif Ullah Principal  
GHS Mandali  
Member

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

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



District Education Office  
District Orakzai

4B

No. 6660  
Date 12/12/2020

9-8

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	Iqbal Ali	15	05/02/1970	01/03/1993	GPS Noor Ali Garhi	GMS Mirzai
2	66	Amal Hassan	15	01/08/1970	23/05/1995	GPS Garhi Mani Khel	GMS Kalayo
3	126	Hassanullah	15	13/02/1972	31/03/2001	GPS Khawas Khel	GMS Akwarha Mela
4	159	Ali Majan	15	05/03/1979	01/09/2003	GPS Sarki Aakhe	GMS Tooli Bagh Orakzai
5	160	Yasin Ullah	15	02/01/1980	01/09/2003	GPS Sarlo 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 Dron Saitkhan
8	169	Samar Gul	15	01/01/1979	29/07/2004	GPS Sangra	GMS Aishli Bazar
9	170	Muhammad Khalid Rehman	15	05/06/1979	03/08/2004	GPS Tarapi Akh Khel	GMS Sarki Khel
10	178	Muhammad Umer	15	22/04/1976	03/09/2005	GPS Rambic Salai Bazar	GMS Gulistan
11	218	Muhammad Waheed	15	16/10/1984	05/09/2005	GPS Khangor	GMS Sarki Khel
12	219	Ullah	15	02/02/1979	23/10/2005	GPS Biland Khel No.2	GMS Biland Khel
13	227	Muhammad Hussain	12	05/05/1985	24/11/2009	GPS Star Sam Khel	GMS Star Sam
14	278	Angila 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 Bado Shellkhan	GMS Mishli Bazar
17	282	Museeb Rehman	12	05/10/1985	24/11/2009	GPS Gul Chen	GMS Babera
18	283	Gul Karim	12	15/01/1982	03/12/2009	GPS Bilazawi	GMS Satri Feroz Khel
19	284	Dale Shah	12	04/04/1980	24/11/2009	GPS Bazed Khel	GMS Mir Mela Saitkhan

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

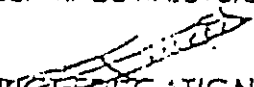
Roll No

Postal

20	285	Mali Ur Fehman	12	20/05/1984	24/11/2009	GPS Jaba Koda	GHS Avi Mela
21	287	Gul Bahir	12	05/04/1979	24/11/2009	GPS Karapa Samano	GHS Gilstan
22	288	Ashfaq Ali Maskeen	12	15/03/1985	24/11/2009	GPS Khar Khushlo	GHS Khalil Ajacy (Khuro)
23	289	S.Khadim Hussain	12	10/04/1984	22/12/2009	GPS Toor Kani	GMS Damber Lassi
24	290		12	03/05/1985	24/11/2009	GPS Shamer	GHS And Khel
25	291	Roes Akbar	12	16/02/1982	24/11/2009	GPS Zakhlar	GHS Dran Shaishan
26	293	Hussain Angher	12	17/02/1981	24/11/2009	GPS Paloes	GMS Khalil Sedoy
27	295	Minawar Khan	12	10/05/1986	24/11/2009	GPS Inawar	GHS Saifal Dara
28	298	Hassan	12	09/01/1987	24/11/2009	GPS And Khel Bala	GMS Zera
29	300	Arnjad Khan	12	10/02/1985	25/11/2009	GPS Burap Ali Khel	GMS Jankli Khel
30	302	Saib Ul Hara	12	20/04/1986	24/11/2009	GPS Panjam Ali Khel	GMS Aiwarha Mela
31	303	Amir ur Pehman	12	03/01/1982	24/11/2009	GPS Khadiza No.1	GHS Swara Kol
32	304	Hikmat Khan	12	02/01/1983	24/11/2009	GPS Sawara Kol	GHS Swara Kol
33	306	Munawar Khan	12	25/10/1982	24/11/2009	GPS Chapper Mishli	GMS Babera Labi
34	307	Muhammad Ghani	12	26/02/1985	24/11/2009	GPS Kol Ali Khal	GMS Damber Lassi
35	308	Painda Khan	12	13/04/1984	25/11/2009	GPS Yusal Khel	GHS Bagh Nal
36	312	Ibrail Khan	12	12/05/1986	24/11/2009	GPS Khadiza No.2	GMS Dana Anula

**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 interference seniority on lower post will remain intact.
6. No TA/DA 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 his wrong promoted he will be reversed.

  
 DISTRICT EDUCATION OFFICER  
 DISTRICT PAKKZA.

Roll No - 6661-69 dated 10/12/2020

Copy forwarded for information and necessary action to the:  
 Director Education (G&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

"C" -11-

7 Allama Iqbal Open University  
Islamabad



Serial No. 132771

Certified that Mr/Ms MUHAMMAD GHANI  
Son/Daughter of ALI GUL  
Registration No. 06AOI0013 Roll No. AX684064  
Semester AUTUMN 2014 having met all the requirements under  
the semester system is this day awarded the

### Certificate of Teaching

He/She has secured 62 % marks  
and placed in B grade



Result declared on: July 14, 2015

Date of issue: May 25, 2018

*M. Anwar*  
Controller of Examinations

Note: This certificate is issued without alteration/erasure.  
The detail of courses is overleaf.

Alama Iqbal Open University  
Islamabad



Serial No 278645

Certified that *Mr/Ms* MUHAMMAD GHANI  
*Son/Daughter of* ALI GUL  
*Registration No* 06AOI0013 *Roll No* AM404833  
*Semester* SPRING 2013 *having met all the requirements under*  
*the semester system in this day awarded the degree of*

Bachelor of Arts  
Group - General

*He/She has secured* 58 *% marks*  
*and has been placed in* C *grade*

*M. Aslam*  
CONTROLLER OF EXAMINATIONS



*S. M. Khan*  
VICE-CHANCELLOR

Result declared on: February 3, 2014  
Date of Issue: April 10, 2018

NOTE: THIS DEGREE IS TO BE READ IN CONJUNCTION WITH THE TRANSCRIPT/PROVISIONAL CERTIFICATE ISSUED SEPARATELY



"D" -13-

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

No. 188U 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. 1435 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 Shan PST (BS-12) including 23 others were promoted to the post of CT (BS-15) vide No. 6661-69 Dated 10-12-2020, which is clear cut violation of Service Rules, 2012.

In this regard; I am further directed to ask you to withdraw the Promotion Order of the mentioned CT, including 23 others earlier notified vide Dated 10-12-2020, as well as such like cases, if any, and compliance report may be shared with this Office, please.

Assistant Director (Estab) Elementary and Secondary Education Khyber Pakhtunkhwa

Encls: No. \_\_\_\_\_

Copy of the above is forwarded to the

- 1. PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa.

Assistant Director (Estab) Elementary and Secondary Education Khyber Pakhtunkhwa

*withheld copy*  
*[Signature]*  
*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 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 is 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 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 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 HANGU  
 Phone # 0925-690017 Fax # 0925-690017  
 Email: deoorakzai2020@gmail.com



No. 411 Date: 19/05/2023

**OFFICE ORDER:**

In compliance of the Directorate of Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar vide letter bearing No. 18811, dated 11-04-2021, 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 monthly tour promoted PSTs in BPS-12 to the posts of CTs in BPS-15 in District Orakzai of the promotion order (list). 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.	Qadir Hussain	GMS Sitar Sam	GPS Dafa Mela
2.	Khatista Jan	GMS Saif Feroz Khol	GPS Sitar Koda
3.	Muhammad Yaqoob	GMS Yako Kadow	GPS Sarti Khol
4.	Muhammad Hanif	GMS Ashu Bazar	GPS Bada Shekhan
5.	Nasrullah Rehman	GMS Babra Laski	GPS Gul Chah
6.	Gul Karim	GMS Saif Feroz Khol	GPS Ghuta, Ali Khol
7.	Dafa Shah	GMS Baidi Khol	GPS Rangin Khol
8.	Mas Ud Rehman	GMS Awi Mela	GPS Daga Jakhak
9.	Gul Rahim	GMS Gullistan	GPS Khas Koda Ho
10.	Ashfaq Ali	GMS Kholi Sapoy	GPS Bai Kot
11.	Maskeen Khan	GMS Damber Lasli	GPS Dhan Shaikhan
12.	Syed Khadim Hussain	GMS Andhel	GMS Shazim
13.	Raoof Akbar	GMS Wamparva	GPS Kagani Sher Sital
14.	Hussain Asghar	GMS Kholi Sapoy	GPS Khar Khushla
15.	Munawar Khan	GMS Saifal Darrah	GPS Akhla Khol
16.	Shireen Hassan	GMS Mirako Payan	GPS Sulaiman Khol
17.	Amjad Khan	GMS Zanka Khol	GPS Taghi
18.	Saqib Ul Islam	GMS Jarra District Kohat	Will be adjusted as and when the in or district transfer is withdrawn by the Directorate of Elementary & Secondary Education, Khyber Pakhtunkhwa
19.	Amir ur Rehman	GMS Swara Kot	GPS Swara Kot
20.	Hilmal Khan	GMS Swara Kot	GPS Khadmal No.1
21.	Munawar Khan	GMS Chapperi Masha	GPS Zor Chappur
22.	Muhammad Ghani	GMS Sitar Koda	Kot Ali Khol
23.	Pandaz Khan	GMS Daghak	Ghulak Ali Khol
24.	Israfil Khan	GMS Dana Khifa	GPS Taropai Khol

**Note:**

- Fresh charge report in their original Basic Pay Scales as on 09-12-2020 should be submitted to P/T concerned within 15 days possibly. In case of failure/refusal, they will be treated under the Khyber Pakhtunkhwa Govt. Servants (Efficiency & Discipline) Rules, 2011.
- 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:-

- Director Elementary and secondary Education Khyber Pakhtunkhwa Peshawar with the request to withdraw in or District transfer order in file S# 18, already transferred to District Kohat vide Directorate of E&SE KP No. 11823-51/F. In S# Transfers Dated Peshawar the 27/12/2022.
- Additional Director (Estab), Directorate of E&SE, KP, Peshawar
- District Education Office (M), District Kohat
- District Monitoring Officer, E&A, District Orakzai.
- District Accounts Officer, District Orakzai
- Deputy DEO (M), Orakzai.
- Assistant Director (Estab), Directorate of E&SE, KP, Peshawar vide his office letter in file attached.
- Principal/Head Master/Incharge HM and Head Teachers concerned.
- SDEs concerned for further necessary action
- Superintendent/Play Clerk O/O the DEO (M) Orakzai for further necessary actions.
- Principal/Head Master/Incharge HM and Head Teachers concerned
- Office Copy

DISTRICT EDUCATION OFFICER (MALE)  
 DISTRICT ORAKZAI

خدمت ختیاہ ڈیپارٹمنٹ ایجوکیشن آفیسر ضلع اور کسبئی

۴

ختیاہ عالی

۱۶-۹۴۷

دفعہ ۱۵ (۱) کی نصاب

۱۵/۱/۲۰۲۳

بمدان - نظر ثانی ایپل برائے ڈیپارٹمنٹ آف ایجوکیشن

گزارش محضوریہ ہے۔ کہ ہمارے آرڈر بطور PST (2009/11/23) کو

بجائے گیارہ سال بعد ان PST اساتذہ کو 10-12-2020 DPC میں CT پر

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

یہ اساتذہ PST (15 سکیل) کے بھی حقدار تھے۔ چونکہ فائما میں CT سٹی اساتذہ

زیادہ جالی تھیں = PST (15 سکیل) نہ ہوئے۔ ہیران اساتذہ کو CT پر پروموشن

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

ختیاہ عالی - اب ڈھائی سو سال CT پر گزارنے کے بعد ان اساتذہ کو CT (15 سکیل) سے دوبارہ

PST (12 سکیل) پر ڈیپارٹمنٹ کیا گیا۔

لہذا اب اساتذہ کی شان اقتدار میں گزارش کی جاتی ہے۔ کہ اس ڈیپارٹمنٹ آرڈر

پر نظر ثانی کر کے سائٹیں کو اصفح رہ کر مشکور فرمائیں۔

نہیں گزارش ہوگی۔ مورخ ۱۵/۰۵/۲۰۲۳

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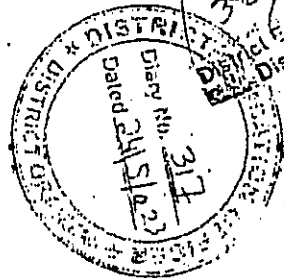
1 - ڈی ای سی اور کسبئی

2 - ڈی ای او اور کسبئی

3 - ڈائریکٹر آف ایجوکیشن ایڈیشنل

کسبئی ایجوکیشن

4 - سیکرٹری ایجوکیشن کے پی کے



DPC-2020

PST to CT

All teachers

General (14) اسرار افغان (14) Sajid (1) شاقب الاسلام

16/A

Khanzaib (15) خانزبان (15) M. Mulk (2) منور افغان

Han (16) خان (16) Aamir (3) احمد افغان

mn (17) منور افغان (17) M. Mulk (4) منور افغان

~~Handwritten~~ (18) خان (18) (5) اقبال سین

~~Handwritten~~ (19) خان (19) (6) افاق علی

~~Handwritten~~ (20) خان (20) (7) محمد یعقوب

~~Handwritten~~ (21) خان (21) (8) دلشاد شاہ

~~Handwritten~~ (22) خان (22) (9) مکن خان

~~Handwritten~~ (23) خان (23) (10) شہین خان

my (24) خان (24) (11) محمد علی

~~Handwritten~~ (12) خان (12) احمد افغان

P. M. (13) خان (13) لائبریرین خان

-16/B-

"F/1"



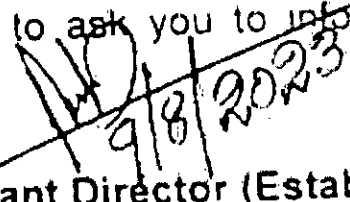
SECONDARY EDUCATION KHYBER  
PAKHTUNKHWA PESHAWAR  
P.NO. 61/DISTRICT CADRE TRANSFERS  
NO. 22964 DATED 09-08/2023

To  
The District Education Officer (Male),  
Orakzai at Hangu

Subject: - APPEAL FOR RESOTRATION OF PROMOTION ORDER.

I am directed to refer to the subject cited above and to state that the Appellant Authority is pleased to reject the appeal in respect of Mr Naseeb Ur Rehman Ex CT, and 23 others, promoted from the post of PSTs (BS-12) to the post of CTs (BS-15), against the existing rules/policy.

In this regard, I am further directed to ask you to inform the appellants accordingly, please.

  
Assistant Director (Estab)  
Elementary and Secondary Education  
Khyber Pakhtunkhwa

Endst: No. \_\_\_\_\_ /F.No.37

Copy of the above is forwarded to the:-

1. PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.

Assistant Director (Estab)  
Elementary and Secondary Education  
Khyber Pakhtunkhwa

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

Appel No 2023

Muhammad Ghani

(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** M Ghani

**ACCEPTED**

**NOOR MOHAMMAD KHATTAK  
ADVOCATE SUPREME COURT**

Waleed Adnan  
**WALEED ADNAN**

Kamran Khan  
**KAMRAN KHAN**

Umar Farooq Mohmand  
**UMAR FAROOQ MOHMAND**

Muhammad Ayub  
**MUHAMMAD AYUB**

&

Mahmood Jan  
**MAHMOOD JAN  
ADVOCATES**