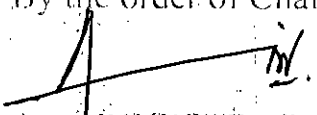


FORM OF ORDER SHEET

Court of

Appeal No. 1706/2023


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. Paimda Khan is re-submitted today by Mr. Noor Muhammad Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 24-08-2023.</p> <p>By the order of Chairman  REGISTRAR</p>

The appeal of Mr. Painsa Khan CT, GHS Bagh Nak 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. 1641 /S.T,

Dt. 9/6 /2023.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

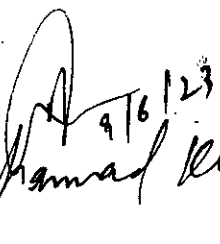
Noor Muhammad Khattak Adv.  
High Court Peshawar.

Note:

Sir,  
The departmental appeal of the appellant is already annexed with the appeal i.e. at Page # 16. So far as the objection/apellate order is concerned, the same has not been issued to the appellant rather the same has been issued/instruction 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.

1731  
12/6/23

NO 1860/ST  
04-07-2023

  
Noor Muhammad Khattak  
Adv.  
9/6/23

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

APPEAL NO. 1706 /2023

PAINDA KHAN

V/S

EDUCATION DEPTT:

**INDEX**

S. NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of appeal	.....	1-3
2.	Application for suspension	.....	4
3.	Copies of the minutes of the DPC dated 14.10.2020 and notification dated 10.12.2020	A & B	5-10
4.	Copy of the educational testimonials	C	11-12
5.	Copies of the letters	D	13-14
6.	Copy of the office order dated 19.05.2023	E	15
7.	Copy of the departmental appeal	F	16
8.	Vakalatnama	.....	17

APPELLANT

Through:

  
**NOOR MOHAMMAD KHATTAK**  
ADVOCATE SUPREME COURT

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

**APPEAL NO. 1706 /2023**

Mr. Painsa Khan, CT (BPS-15),  
GHS Bagh Nak, 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 of 08.2023 may very kindly be set aside and the promotion order dated 10.12.2020 be restored with all back benefits. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.**

**R/SHWETH:**

**ON FACTS:**

1. That appellant was an employee of the respondent Department and performing his duty with full zeal & zest and up to the entire satisfaction of his high ups.
2. That the appellant being qualified was appointed as PST on 25.11.2009, in the respondent department and since then they are working with the full zeal and zest.
3. That it is pertinent to mention here that 60 number of posts of CT (BPS-15) were laying vacant in the District Orakzai. That a DPC was held to fill up the subject posts and amongst these posts 36 number of posts were allocated to the quota of PST/PSHT/SPST. That a DPC meeting was held on 14.10.2020 wherein the appellant was

recommended for the post of CT (BPS-15) and vide notification dated 10.12.2020 the appellant was promoted to the post of CT (BPS-15). Copies of the minutes of the DPC dated 14.10.2020 and notification dated 10.12.2020 are attached as 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 note on the departmental appeal with no good reasons.
10. That having no other remedy preferred the instant appeal on the following grounds amongst the others.

**GROUND:**

- A- That the impugned order dated 19.05.2019 and appellate order dated 09.08.2023 issued by the respondents are against the law, facts, norms of natural justice and materials on the record hence not tenable in the eyes of law.
- B- That the appellant has not been treated in accordance with law and Rules by the respondents on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That no show cause notice has been served upon the appellant before the issuance of the impugned orders.

- D- That no right of defense has been provided to the appellant hence he has been condemned unheard thus violated Article-10-A of the constitution of the Islamic Republic of Pakistan, 1973.
- E- That under the principle of *Locus Poenitentiae* the respondents are duty bound not to withdraw the promotion order.
- F- That no regular inquiry has been conducted in to the matter before the issuance of the impugned orders.
- G- That the respondents acted in arbitrary and mala fide 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

  
**PAINDA KHAN**

Through:

  
**NOOR MOHAMMAD KHATTAK**  
ADVOCATE SUPREME COURT

  
**KAMRAN KHAN**

  
**UMAR FAROOQ**

  
**MUHAMMAD AYUB**

  
**WALEED ADNAN**

  
**MAHMOOD JAN**  
Advocates, Peshawar

**AFFIDAVIT**

I, Paimda Khan, CT (BPS-15), GHS Bagh Nak, 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

**PAINDA KHAN                      VS                      EDUCATION DEPT.**

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

**R.SHEWETH:**

1. That, the titled appeal is submitted before this Honorable tribunal along with this application in which no date has been fixed yet.
2. That the applicant had filed the titled appeal against order dated 19.05.2023 whereby his promotion from PST to CT notification has been withdrawn.
3. That, all the three ingredients required for grant of stay are in favor of the appellant.
4. That the contents of the appeal may be kindly be considered as part and parcel of the instant application.
5. That, any other ground would be taken at the time of arguments with prior permission of this Honorable Tribunal.

It is therefore, most humbly prayed that on acceptance of this application the impugned order dated 19.05.2023 may very kindly be suspended till the disposal of the instant service appeal.

APPELLANT  
THROUGH:

**NOOR MUHAMMAD KHATTAK**  
ADVOCATE SUPREME COURTTE



District Education Office  
District Orakzai

No. 3514

Phone: 0925-690017 FAX: 0925-690017

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. Salf 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



Sr. #	Sr. #	Name of teacher	RP S	Date of Birth	Regular Service	Place of Posting	Remarks
1	36	Zeenat Ali	13	03/02/1970	01/03/1993	GPS Noor Ali Garhi	
2	66	Anat Hassan	13	01/08/1970	23/05/1993	GPS Garhi Mani Khel	
3	126	Hassanullah	13	13/02/1972	31/03/2001	GPS Khawas Khel	
4	159	Ali Mujum	13	03/03/1979	01/09/2003	GPS Sarka Aakhel	
5	160	Yasin Ullah	13	02/01/1980	01/09/2003	GPS Sarla Mishil	
6	161	Ahmadwar Shah	13	10/03/1982	01/10/2003	GPS Sarki Khel	
7	166	Ahmad Shakoar	13	01/03/1973	23/10/2003	GPS Sama Manzai	
8	169	Samar Gul	13	01/01/1979	29/07/2004	GPS Sangra	
9	170	Kh. Ali in Rehman	13	05/06/1979	03/08/2004	GPS Taropi Ali Khel	
10	178	Muhammad Umer	13	22/04/1976	03/09/2005	GPS Rambic Salal	
11	218	Mir Asghar	13	16/10/1984	05/09/2005	GPS Khairgar Boor	
12	219	Wahed Ullah	13	02/02/1979	23/10/2005	GPS Biland Khel No. 2	
13	277	Iqbal Hussain	12	03/03/1985	24/11/2009	GPS Ster Sam	
14	278	Khaista Jan Muhammad	12	01/03/1986	24/11/2009	GPS Mir Kalam Khel	
15	279	Yusuf Muhammad	12	09/03/1987	24/11/2009	GPS Malang garhi	
16	280	Hamid Nusrat	12	21/12/1982	24/11/2009	GPS Bada Sheikhan	
17	282	Rehman	12	05/10/1985	24/11/2009	GPS Gul Cheri	
18	283	Gul Karim	12	13/01/1982	03/12/2009	GPS Bilazawi	
19	284	Dabil Shah	12	04/04/1980	24/11/2009	GPS Bazar Khel	
20	285	Rehman	12	20/05/1984	24/11/2009	GPS John Kada	
21	287	Gul Rahim	12	05/04/1979	24/11/2009	GPS Karapa Samana	
22	288	Ashfaq Ali	12	18/05/1985	24/11/2009	GPS Khar Khushita	
23	289	Maskeen Khan S. Khudum	12	10/04/1984	02/12/2009	GPS Toor Kani	
24	290	Hussain	12	03/05/1985	24/11/2009	GPS Shamer	
25	291	Razaq Akbar	12	15/02/1982	24/11/2009	GPS Zakhlan	
26	293	Asghar	12	10/02/1981	24/11/2009	GPS Palansi	
27	295	Khan	12	10/05/1986	24/11/2009	GPS Injavar	
28	298	Sharm Hussain	12	09/04/1987	24/11/2009	GPS And Khel Bala	
29	300	Imdad Khan	12	18/07/1985	25/11/2009	GPS Baropi Ali Khel	
30	302	Iqbal	12	20/01/1986	24/11/2009	GPS Panjam Ali Khel	

6

303	Eshwan	12	04/10/1982	24/11/2009	GPS Khadizai No.1
304	Ahmad Khan Munawar	12	02/10/1983	24/11/2009	GPS Sawara Kol GPS Chopper Mishli
306	Khan Mohammad	12	25/10/1982	24/11/2009	
307	Ghani	12	26/02/1985	24/11/2009	GPS Kot Ali Khel
308	Painda Khan	12	13/04/1984	25/11/2009	GPS Yusuf Khel
312	Iswajil 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. Shakoor Ahmad  
SST GHS Swara Kol  
Member

3. Mr. Abdul Malik  
ADEO Orakzai  
Member

4. Kausar Ali  
ADEO Orakzai  
Member

5. Mrs. Nabila Naz  
ADEO Orakzai  
Member

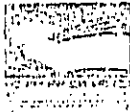
6. Muhammad Iqbal (HM)  
GHS Mishli Bazar  
Member

7. Mr. Rals Khan  
ADEO Orakzai  
Member

8. Sarf Ullah Principal  
GHS Mandali  
Member

9. Jameed Ullah Jan  
Additional Director NMD  
KP EASED Representative

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



District Education Office  
District Orakzai

4B= No. 6660-9-8  
Dated 20/12/2020

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	Zaenal 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 Khawas Khel	GMS Akwarha Khela
4	152	ZF Majeed	15	05/03/1979	01/09/2003	GPS Sarka Aokha	GMS Tooli Bagh, Orakzai
5	160	Yasin Ullah	15	02/01/1980	01/09/2003	GPS Sarla Mishli	GMS Mishli Bazar
6	161	Munawar Shah	15	10/03/1982	01/10/2003	GPS Sarki Khel	GMS Inzer Palli
7	166	Anchil Shakoor	15	01/03/1972	23/10/2003	GPS Sama Mamozai	GMS Dron Shaikhon
8	169	Samar Gul	15	01/01/1979	29/07/2004	GPS Sangra	GMS Mishli Bazar
9	170	Muhammad Umer	15	05/06/1979	03/08/2004	GPS Tarapi Ali Khel	GMS Sarki Khel
10	172	Muhammad Umer	15	22/04/1976	03/09/2005	GPS Rambic Salai	GMS Gulistan
11	212	Mir Asghar Waheed Ullah	15	16/10/1981	05/09/2005	GPS Khangar Bazar	GMS Sarki Khel
12	219	Ullah	15	02/02/1979	23/10/2005	GPS Biland Khel No.2	GMS Biland Khel
13	277	Iqbal Hussain	12	05/05/1985	24/11/2009	GPS Star Sam	GMS Star Sam
14	278	Khaista Jan Muhammad	12	01/03/1986	24/11/2009	GPS Mir Kalam Khel	GMS Casim Khel, Orakzai
15	279	Yaqoob	12	09/03/1987	24/11/2009	GPS Malang garhi	GMS Yakho Kandaw
16	280	Muhammad Hanif	12	21/12/1982	24/11/2009	GPS Bado Shaikhon	GMS Mishli Bazar
17	282	Naseeb Fehman	12	05/10/1985	24/11/2009	GPS Gul Cheri	GMS Babero Laki
18	283	Gul Karim	12	15/01/1982	03/12/2009	GPS Bilazawi	GMS Salri Feroz Khel
19	284	Dalit Shah	12	04/04/1980	24/11/2009	GPS Bazed Khel	GMS Mir Mehtab Gulistan

District Education Officer  
Orakzai District at Hangu

Regular 9 Postical

20	285	Mohi Ur Rehman	12	20/05/1984	24/11/2009	GPS Joba Kado	GHS Avi Melo
21	287	Gul Bahira	12	05/04/1979	24/11/2009	GPS Karapa Samara	GHS Gulistan
22	288	Ashfaq Ali	12	18/03/1985	24/11/2009	GPS Khar Khushla	GMS Khalil Sepoy (Khura)
23	289	Muskeen Khan	12	10/04/1984	02/12/2009	GPS Toor Koni	GMS Damber Lasli
24	290	S.Khadim Hussain	12	03/05/1985	24/11/2009	GPS Shamer	GHS And Khel
25	291	Saeed Akbar Hussain	12	16/02/1982	24/11/2009	GPS Zakhlan	GHS Dran Sheikhan
26	292	Amir Khan	12	10/02/1981	24/11/2009	GPS Palaos	GMS Khalil Sepoy
27	293	Injwar	12	10/05/1986	24/11/2009	GPS Injwar	GHS Sailal Dara
28	294	Hassan	12	09/10/1987	24/11/2009	GPS And Khel Bala	GMS Dara
29	295	Amjad Khan	12	18/02/1985	25/11/2009	GPS Himat Ali Khel	GMS Janku Khel
30	296	Sadia Ullah	12	20/04/1986	24/11/2009	GPS Panjam Ali Khel	GMS Alwarha Melo
31	297	Amir Rehman	12	03/10/1982	24/11/2009	GPS Khadiza No.1	GHS Swara Kol
32	298	Faisal Khan	12	02/10/1983	24/11/2009	GPS Sawara Kol	GHS Swara Kol
33	299	Munawar Khan	12	25/10/1982	24/11/2009	GPS Chapper Mishli	GMS Baberg Lasli
34	300	Muhammad Ghani	12	26/02/1985	24/11/2009	GPS Kol Ali Khel	GMS Damber Lasli
35	301	Palinda Khan	12	13/04/1984	25/11/2009	GPS Yusuf Khel	GHS Bagh Nal
36	302	Imran Khan	12	12/05/1986	24/11/2009	GPS Khadiza No.2	GMS Dana Khula

**Terms & Conditions:**

1. They would be on probation for a period of one year extendable for further period of one year.
2. They will be governed by such rules & regulations as and when issued from time to time by the govt.
3. Their services can be terminated at any time in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be proceeded under the rules framed time to time.
4. Charge report should be submitted to all concerned.
5. There inter-Se 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. 6661-69 dated: 10/12/2020

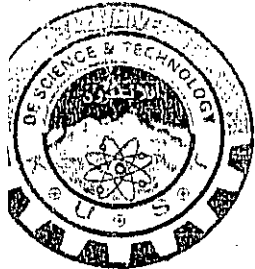
Copy forwarded for information and necessary action to the:

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



23 UC 11 160/33

Serial No. 018342

# Kohat University

of Science & Technology, Kohat (Pakistan)

## DETAILED MARKS CERTIFICATE

Bachelor of Arts (B.A) Part II Supplementary  
Examination, 2008

Name: Painda Khan Roll No. 6126  
Father's Name: Hakeem Khan Registration No. 2007-PCKU-1639

Certified that the candidate secured the following marks and is placed in 2nd Division

S U B J E C T S	Maximum Marks	M A R K S O B T A I N E D	
		In Figure	In Words
English Compulsory	75	30	Thirty
Islamic Studies	75	55	Fifty Five
Pashto	75	38	Thirty Eight
Pak Studies	40	17	Seventeen
<i>Part-I Marks</i>	285	150	One Hundred Fifty
Total	550	290	Two Hundred Ninety

The examination was taken in Parts

To Pass 40% Marks in each Subject (Written & Practical Separately) & 45% Marks in Aggregate.

Result declared on 01-Jun-09

CONTROLLER OF EXAMINATIONS  
Kohat University of Science and Technology  
Kohat, Pakistan

**ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD**  
**PROVISIONAL RESULT CARD - 12-**



Serial No. 98282

Name: PAINDA KHAN  
 Father's Name: HAKEEM KHAN  
 Address: TAMEER E SEERAT HIGH SCHOOL  
 HANGU  
 Tehsil: HANGU  
 District: HANGU  
 Has successfully completed

Roll No. AG664623  
 Registration No. 10A0100103  
 Final Semester AUT- 2010

**CERTIFICATE OF TEACHING**

The detail of passed courses are as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
SPR- 10	0632	EDUCATIONAL PSYCHOLOGY	100	67
SPR- 10	0631	DIMENSIONS IN EDUCATION	100	50
SPR- 10	0633	SCHOOL ORGANIZATION	100	53
AUT- 10	0612	PRACTICAL WORKSHOP & TEACHING PRACTICE	100	71
AUT- 10	0634	ENGLISH AND ITS TEACHING	100	54
AUT- 10	0605	SOCIAL STUDIES & ITS TEACHING	100	60
AUT- 10	0635	ISLAMIAT AND ITS TEACHING	100	76
AUT- 10	0638	TEACHING STRATEGIES & EVALUATION	100	63
AUT- 10	0604	URDU LANGUAGE AND ITS TEACHING	100	59

CREDITS: 5

Result Declared on AUGUST 06, 2011

Date of issue AUGUST 15, 2011

Total Marks / Obtained 900 / 553

Percentage / Grade 61 B

**Controller of Examinations**

**Disclaimer:**

This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.



-13- "D"

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

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

Assistant Director (Estab)  
Elementary and Secondary Education  
Khyber Pakhtunkhwa

Endst: No. \_\_\_\_\_

Copy of the above is forwarded to the  
1. PA to Director Elementary and Secondary Education Khyber  
Pakhtunkhwa.

Assistant Director (Estab)  
Elementary and Secondary Education  
Khyber Pakhtunkhwa

*Wahidullah*

*7/1/23*





-14-

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



No. 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 Orakzai issued vide Notification of this office bearing No. 6660, dated 10-12-2020 to the extent of Serial No. 13 to 36, twenty four/24 in counting.

Foregoing in view of the above, the aforesaid twenty four/24 PSTs in BPS: 12 have been promoted to the post of CT BPS: 15 in District Orakzai by adhering the following criteria.

- 1) WHEREAS, the promoted PSTs have been appointed on 24/09/2009 as PST BPS: 12, hence having 13 years of continuous Govt. regular services during promotion in 2020.
- 2) WHEREAS, there are no sanctioned posts of SPST BPS: 14 for promotion of these PSTs.
- 3) WHEREAS, in case of availability of the sanctioned posts of SPST in BPS: 14, these promoted PSTs would have been eligible for promotion to the posts of SPST BPS: 14 prior to this promotion way back in 2014 as per service rules 2012.
- 4) WHEREAS, there was no other eligible willing senior candidate than the promoted PSTs for promotion to the posts of CT BPS: 15.
- 5) WHEREAS, 60 posts of CT in BPS: 15 (Male) in district Orakzai were lying vacant at the time of DPC in 2020 and those PSTs in BPS: 12 have been promoted under Service Rules 2012 the 60% share of SPS/PSHT to the posts of CT in BPS: 15.
- 6) WHEREAS, the promoted PSTs had already been served on the posts of CTs in BPS: 15 since 11/12/2020 and one of the promoted PST (Mr. Saqib ul Islam) has already obtained the inter district transfer/NOC and serving in District Kohat on the post of CT in BPS: 15.

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

DISTRICT EDUCATION OFFICER-(M)

ORAKZAI

Copy of Even No. & Date:

Copy forwarded for information and necessary action to the:-

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

DISTRICT EDUCATION OFFICER-(M)

ORAKZAI



OFFICE OF THE DISTRICT EDUCATION OFFICER (M)-ORAKZAI  
 DISTRICT HEADQUARTER ORAKZAI AT BABER MELA HANGU  
 Phone # 0925-890017 Fax # 0925-690017  
 Email: deoorakzai2020@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. 10811, dated 11-04-2021, the competent authority DEO (M) Orakzai is pleased to withdraw the promotion orders bearing Endst: No. 6660, dated 10-12-2020 in respect of the following twenty four promoted PSTs in BPS: 12 to the posts of CTs in BPS: 15 in District Orakzai of the promotion order. d.d. 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	Imdad Hussain	GMS Siva Sam	GPS Dara Mela
2	Khalida Jan	GMS Sakri Feroz Khel	GPS Sira Keda
3	Muhammad Yaqoob	GMS Yakhro Kundoor	GPS Gari Khel
4	Muhammad Haid	GMS Wazir Bazar	GPS Bado Shekhar
5	Haseeb Rehman	GMS Batra Laaki	GPS Gul Chidi
6	Gul Khan	GMS Sakri Feroz Khel	GPS Ghulak Ali Khel
7	Dal Shah	GMS Barik Khel	GPS Rangin Khel
8	Mahid Ur Rehman	GMS Awi Mela	GPS Dago Takhtak
9	Gul Rahim	GMS Gulistan	GPS Khoo Kanda Mela
10	Ashiq Ali	GMS Khalil Sepoy	GPS Dal Kol
11	Mashreen Khan	GMS Damber Lashi	GPS Oran Shaikh
12	Sayed Khawar Hussain	GMS Andhri	GMPS Stramer
13	Rana Akber	GMS Wampara	GPS Kagnal Shal
14	Hussain Ayub	GMS Khalil Sepoy	GPS Khar Khushla
15	Munawwar Khan	GMS Saif Darrah	GPS Aukhin Gila
16	Shamir Hassan	GMS Mirko Paym	GPS Sulman Khel
17	Amjad Khan	GMS Zanka Khel	GPS Taghna
18	Sudh Ustam	GMS Jammu 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	Muhamad Khan	GMS Swaro Kol	GPS Khadzi No. 1
21	Munawwar Khan	GMS Chapper Mishg	GPS Zar Chapper
22	Muhammad Ghani	GMS Sira Keda	Kol Ali Khel
23	Panda Khan	GMS Baghnak	Ghulak Ali Khel
24	Israfil Khan	GMS Dana Khel	GPS Talapi Ad Khel

**Note:**

- 1) Fresh charge report in their original Basic Pay Scales as on 09-12-2020 should be submitted to all concerned within 15 days positively. In case of failure/refusal, they will be treated under the Khyber Pakhtunkhwa Govt. Servants Efficiency & Discipline Rules, 2011.
- 2) TADA is not allowed for jobbing 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 SW 18, already transferred to District Kohat vide Directorate of E&SE VP No. 13872/817/No.51, Transfer Order 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, EIAA, District Orakzai.
  - 5) District Accounts Officer, District Orakzai.
  - 6) Deputy DED (M), Orakzai.
  - 7) Assistant Director (Estab), Directorate of E&SE, VP, Peshawar vide his office letter quoted above.
  - 8) Principal/Head Master/Incharge PMA and Head Teachers concerned.
  - 9) DEOs concerned for further necessary action.
  - 10) Superintendent/Pay Clerk C/O the DED (M) Orakzai for further necessary action.
  - 11) P.T.O. concerned.
  - 12) Office Copy.

DISTRICT EDUCATION OFFICER (MALE)  
 DISTRICT ORAKZAI

خدمت خٹاب ڈسٹرکٹ ایجوکیشن آفیسر ضلع اورکزیٹی

۱۶-۹۴۷ - خٹاب عالی

۱۱/۱۱/۲۰۲۳  
۲۱/۱۱/۲۰۲۳

سٹاف - نظر ثانی میل برائے ڈیگزیشن آرڈر

گزارش حقوق و سہولتوں کے بارے میں ہے۔ کہ ہمارا آرڈر بطور PST (23/11/2009) کو

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

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

یہ اساتذہ PSI (15 سکیل) کے بھی حقدار تھے، چونکہ فائٹل میں CT سہولت بیان

زیدہ خالی تھی۔ PSHT (15 سکیل) نہ ہوئے تھے۔ یہ اساتذہ کو CT پر پروموشن

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

خٹاب عالی - اب ڈسٹریکٹ ڈیپارٹمنٹ میں گزارنے کے بعد ان اساتذہ کو CT (15 سکیل) سے دوبارہ

PST (12 سکیل) پر ڈیگزیشن دیا گیا۔

بھلا اب جاعناب کی شان انڈس میں گزارا گیا ہے۔ کہ اس ڈیگزیشن آرڈر

نظر ثانی کر کے سائٹلین کو اہل حق دے کر شکور فرمائیں۔

سین تواریش ہوگی۔ مورخہ 20/05/2023

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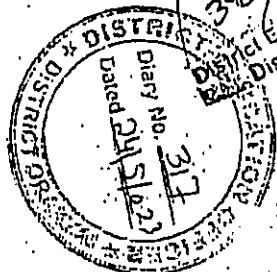
1- ڈی سی اورکزیٹی

2- ڈی ای او اورکزیٹی

3- ڈائریکٹر آف ایڈیوکیشن اینڈ

سکلڈی ایجوکیشن

4- سیکریٹری ایجوکیشن کے پی کے



DPC-2020

PST to CT

All teachers

1) Shafiq - 16/A - Asrafiq (14)

2) M. Mulk - Khan (15)

3) Aamir - Han (16)

4) Shah - M. Mulk (17)

5) Shah - Shah (18)

6) Shah - Shah (19)

7) Shah - Shah (20)

8) Shah - Shah (21)

9) Shah - Shah (22)

10) Shah - Shah (23)

11) Shah - Shah (24)

12) Shah - Shah (25)

13) Shah - Shah (26)

-16/B-

"F/1"



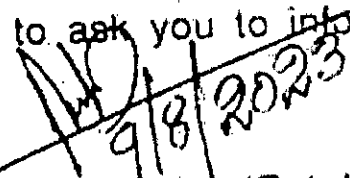
SECONDARY EDUCATION KHYBER  
PAKHTUNKHWA PESHAWAR  
P.NO. 61/DISTRICT CADRE TRANSFERS  
NO. 22964 DATED 09-08/2023

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.

  
9/8/2023  
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        /2023

Parinda Khan

(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** Parinda Khan

**ACCEPTED**

M  
**NOOR MOHAMMAD KHATTAK**  
**ADVOCATE SUPREME COURT**  
M Adnan  
**WALEED ADNAN**  
M  
**KAMRAN KHAN**  
Umar Farooq  
**UMAR FAROOQ MOHMAND**  
Muhammad Ayub  
**MUHAMMAD AYUB**  
Mian  
**MAHMOOD JAN**  
**ADVOCATES**

&

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