


FORM OF ORDER SHEET

Court of _____

Appeal No. 1708/2023

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 Hanif 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. Muhammad Hanif CT GHS Mishti Bazar Orakzai received today i.e. 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.
- 3- Memorandum of appeal be signed by the appellant.

No. 1635 /S.T,

Dt. 9/6 /2023.



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Noor Muhammad Khattak Adv.
High Court Peshawar.

R/Sr,

The Departmental Appeal is already annexed with it at page-16. So far as the rejection/appellate order is concerned, the same has been issued/written in the face of departmental Appeal which is available at Annexure-# page-17.

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

Noor Muhammad Khattak
ASC

1731
12/6/23

No 1860/ST

04-07-2023

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

APPEAL NO. 1708 /2023

MUHAMMAD HANIF

V/S

EDUCATION DEPTT:

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APPELLANT

Through:

NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT

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

APPEAL NO. 1708 /2023

Mr. Muhammad Hanif, CT (BPS-15),
GHS Mishti Bazar, 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1974 AGAINST THE IMPUGNED ORDER DATED 19.05.2023 WHEREBY THE PROMOTION ORDER DATED 10.12.2020 OF THE APPELLANT HAS BEEN WITHDRAWN AND AGAINST THE APPELLATE ORDER DATED ~~09-08~~-2023 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT HAS BEEN REGRETTEED ON NO GOOD GROUNDS.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 ~~08.08~~ 08.08.2023 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 ~~08.08~~ 08.08.2023 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 HANIF

Through:

NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT

KAMRAN KHAN

UMAR FAROOQ

MUHAMMAD AYUB

WALEED ADNAN

MAHMOOD JAN

Advocates, Peshawar

AFFIDAVIT

I, Muhammad Hanif, CT (BPS-15), GHS Mishti Bazar, 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 HANIF VS EDUCATION DEPT.

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

R.SHEWETH:

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

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

APPELLANT

THROUGH:


NOOR MUHAMMAD KHATTAK
ADVOCATE SUPREME COURT



District Education Office
District Orakzai

No. 35/4

Phone 0925-690017 FAX 0925-690017 Dated 14/10/2020

"A"

- 6 -

- 5 -

MINUTES OF THE MEETING OF DEPARTMENTAL PROMOTION COMMITTEE HELD ON 14-10-2020 AT 10:30 AM

A meeting of the Departmental Promotion Committee was held today on 14-10-2020 at 10:00 AM under the Chairmanship of District Education Officer District Orakzai to discuss the promotion cases of Male, PST/SPST/PSHT to CT B-15, in the District Education Office Orakzai. The following attended the meeting:

- | | |
|--|--------------------------|
| 1. Mr. Farced Ullah Mehsud, District Education Officer | Chairman |
| 2. Mr. Hamced Ullhan Jan, Additional Director NMD | (KPE&SED) Representative |
| 3. Mr. Saif Ullah, Principal B-19 GHS Mandali District Orakzai | Member |
| 4. Mr. Muhammad Inbal, HM GHS Mishli Bazar | Member |
| 5. Kausar Ali, ADEO District Orakzai | Member |
| 6. Mr. Abdul Abdul Malik, ADEO District Orakzai | Member |
| 7. Mst. Nanila Naz, ADEO District Orakzai | Member |
| 8. Mr. Shakeel Ahmed, SST GHS Swaro Kot | Member |
| 9. Mr. Waleed 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. No	Name of teacher	BP S	Date of Birth	Regular Service	Place of Posting	Remarks
1	Zama Ali	15	03/02/1970	01/03/1983	GPS Naor Ali Garhi	
2	Amal Hassan	15	01/08/1970	23/05/1985	GPS Garhi Mani Khel	
3	Hassanullah	15	13/02/1972	31/03/2001	GPS Khawas Khel	
4	Ali Maham	15	03/03/1979	01/09/2003	GPS Sarka	
5	Yasin U Rah	15	02/01/1980	01/02/2003	GPS Ankhel	
6	Shah	15	10/05/1982	01/10/2003	GPS Sarla Mshiti	
7	Abdul Mubakar	15	01/03/1972	23/10/2003	GPS Sarka Khel	
8	Samun Gul	15	01/01/1979	29/07/2004	GPS Sama Mamozai	
9	Rehman	15	05/06/1979	03/08/2004	GPS Sangra	
10	Muhammad Ghore	15	22/02/1976	03/09/2005	GPS Tarapi Ali Khel	
11	Mir Asghar	15	16/10/1984	05/09/2005	GPS Rambic Salal	
12	Wahed Ullah	15	02/03/1979	23/10/2005	GPS Khongar Baor	
13	Iqbal Hussain	12	05/05/1985	24/11/2009	GPS Bhand Khel No.2	
14	Khaista Jan	12	01/03/1986	24/11/2009	GPS Sier Sam	
15	Muhammad Yaqoob	12	09/03/1987	24/11/2009	GPS Mir Kalam Khel	
16	Muhammad Hamid	12	21/12/1982	24/11/2009	GPS Malang garhi	
17	Naseeb Rehman	12	05/10/1985	24/11/2009	GPS Bada Sheikhani	
18	Gul Karim	12	15/01/1982	03/12/2009	GPS Gul Cheri	
19	Dahl Shah	12	04/04/1980	24/11/2009	GPS Bilazawi	
20	Mauli U. Rehman	12	20/05/1984	24/11/2009	GPS Bazed Khel	
21	Gul Rahim	12	05/01/1979	24/11/2009	GPS Jaha Kada	
22	Ashfaq Ali	12	18/05/1985	24/11/2009	GPS Karapa Simana	
23	Muskeen Khan S. Khudhu	12	10/04/1984	02/12/2009	GPS Khar Khushia	
24	Hussain	12	03/05/1985	24/11/2009	GPS Toor Kani	
25	Rozay Akbar Hussain	12	13/02/1983	24/11/2009	GPS Shamer	
26	Asghar	12	14/02/1981	24/11/2009	GPS Zakhtan	
27	Munawar Khan	12	10/05/1986	24/11/2009	GPS Paloozi	
28	Sherin Hassan	12	09/10/1987	24/11/2009	GPS Hijawar	
29	Amjad Khan	12	18/02/1985	23/11/2009	GPS And Khel Bala	
30	Saqib U. Isfah	12	20/04/1986	24/11/2009	GPS Berapi Ali Khel	
					GPS Panjam Ali Khel	

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31	303	Amir ur Rehman	12	03/10/1982	24/11/2009	GPS Khadizai No.1
32	304	Hikmat Khan Munawar	12	02/10/1983	24/11/2009	GPS Sawara Kot GPS Chapper Mishli
33	306	Muhammad Ghani	12	25/10/1982	24/11/2009	GPS Kot Ali Khel
34	307	Paluda Khan	12	13/04/1984	25/11/2009	GPS Yusuf Khel
35	308	Israfil Khan	12	12/05/1986	24/11/2009	GPS Khadizai No.2

-3-7-

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 Iqbal (HM)
GHS Mishli Bazar
Member

7. Mr. Rais Khan
ADEO Orakzai
Member

8. Saif Ullah Principal
GHS Mandail
Member

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

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



District Education Office
District Orakzai

No: 6660 - 8-
Date: 10/12/2020

Phone: 0923-690017 FAX: 0923-690017

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	Usman Ali	15	05/02/1970	01/03/1993	GPS Noor Ali Garhi	GMS Mirzai
2	160	Arif 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 Marla
4	157	A. Mojan	15	05/03/1979	01/09/2003	GPS Sarla Aathe	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 Patti
7	160	Abdul Shakoor	15	01/03/1972	23/10/2003	GPS Sama Mamozai	GMS Dron Sheikhhan
8	169	Samar Gul	15	01/01/1979	29/07/2004	GPS Sangra	GMS Mishli Bazar
9	171	Shahid ur Rehman	15	05/06/1979	03/08/2004	GPS Tarapi Ali Khel	GMS Sarki Khel
10	178	Muhammad Umer	15	22/04/1976	03/09/2005	GPS Rombic Salai	GMS Gulistan
11	218	M. Arshad	15	14/10/1984	05/09/2005	GPS Khangor Bazar	GMS Sarki Khel
12	219	Muhammad Ullah	15	02/02/1979	23/10/2005	GPS Biland Khel No.2	GMS Biland Khel
13	277	Iqbal Hussain	12	05/05/1995	24/11/2009	GPS Sier Sam	GMS Sier Sam
14	275	Engr. J. Jan	12	01/03/1986	24/11/2009	GPS Mir Kalam Khel	GMS Clasm Khel, Orakzai
15	273	Muhammad Yaqoob	12	09/03/1987	24/11/2009	GPS Malang Garhi	GMS Yakh Kandar
16	269	Muhammad Hanif	12	21/12/1982	24/11/2009	GPS Bado Sheikhhan	GMS Mishli Bazar
17	262	Maseeb Rahman	12	05/10/1985	24/11/2009	GPS Gul Cheri	GMS Babera Lari
18	253	Gul Karim	12	15/01/1982	03/12/2009	GPS Bilazawi	GMS Sadr Feroz Khel
19	284	Dalil Shah	12	04/04/1980	24/11/2009	GPS Bared Khel	GMS Mir Akbar Sheikhhan

(Signature)
District Education Officer
Orakzai District at Hangu

20	285	Mahmud Rehman	12	20/05/1984	24/11/2009	GPS Jaba Kada	GMS Avi Melo
21	287	Gul Rohim	12	05/04/1979	24/11/2009	GPS Karapa Samana	GMS Gulistan
22	288	Ashfaq Ali	12	18/03/1985	24/11/2009	GPS Khar Khushla	GMS Khalil Sepoy (Khura)
23	289	Maskeen Khan	12	10/04/1984	02/12/2009	GPS Taor Kani	GMS Damber Laski
24	290	S.Khadim Hussain	12	03/05/1985	24/11/2009	GPS Shamer	GMS And Khel
25	291	Faees Akbar	12	16/02/1982	24/11/2009	GPS Zakhlan	GMS Dhan Shekhan
26	293	Hussain Anghar	12	10/02/1981	24/11/2009	GPS Palosi	GMS Khalil Sepoy
27	295	Minawar Khori	12	10/05/1986	24/11/2009	GPS Injwar	GMS Saifal Dara
28	298	Muhammad Hassan	12	09/10/1987	24/11/2009	GPS And Khel Bala	GMS Zera
29	300	Arifad Khan Saibul	12	10/02/1985	25/11/2009	GPS Ilmapi Ali Khel	GMS Zanka Khel
30	302	Arif ur Bharn	12	20/04/1986	24/11/2009	GPS Panjam Ali Khel	GMS Alwarha Mela
31	303	Arif ur Rehman	12	03/10/1982	24/11/2009	GPS Khadizai No.1	GMS Swara Kol
32	304	Hikmat Khan Munawar	12	02/10/1983	24/11/2009	GPS Sawara Kol	GMS Swara Kol
33	305	Muhammad Khan	12	25/10/1982	24/11/2009	GPS Chapper Mishli	GMS Babera Laski
34	307	Muhammad Ghani	12	26/02/1985	24/11/2009	GPS Kol Ali Khel	GMS Damber Laski
35	308	Faizda Khan Khalil Khan	12	13/04/1984	25/11/2009	GPS Yusuf Khel	GMS Bagh Nak
36	312		12	12/05/1986	24/11/2009	GPS Khadizai 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-Sr seniority on lower post will remain intact.
6. No TA/DA is allowed for joining his duty.
7. They will give an under taking to be recorded in their service book to the effect that if any over payment is made to him in light this order will be recovered and if he is wrongly promoted he will be reversed.

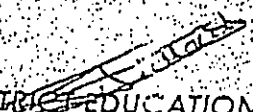
DISTRICT EDUCATION OFFICER
DISTRICT ORAKZAI

Endst No. 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

(21)

"C" - 11-

Allama Iqbal Open University Islamabad



Serial No. 105477

Certified that Mr./Ms **MUHAMMAD HANIF**
Son/Daughter of **KHIAL SHAH**
Registration No **07-AOI-0017** *Roll No* **W690141**
Semester **SPRING 2008** *having met all the requirements under*
the semester system in this day awarded the

Certificate of Teaching

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



Result declared on **January 10, 2009**

Date of issue **March 30, 2013**

[Signature]

[Signature]
Controller of Examinations

Note: This certificate is issued without affiliation/pressure
The valid of courses is overleaf



S. No. 012446

KOHAT UNIVERSITY OF SCIENCE & TECHNOLOGY KOHAT (PAKISTAN)

DETAILED MARKS CERTIFICATE

Bachelor of Arts. (B.A) Part II Supplementary Examination 2005

Name: Muhammad Hanif Roll No: 3629
 Father's Name: Khial Shah Reg No: 2004-PCKU-1976

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	24	Twenty Four
Islamic Studies	75	42	Forty Two
Pachto	75	53	Fifty Three
Pak Studies	40	14	Fourteen
Part-I Marks	285	148	One Hundred Forty Eight
Total	550	281	Two Hundred Eighty One

The examination was taken in Parts

To Pass 33% Marks in each Subject (Arabic & Practical Separately) & 30% Marks in Aggregate

Result declared on 14-Apr-06

Date

Errors and omissions are subject to subsequent rectification.

Controller of Examinations
 Kohat University of Science and Technology
 Kohat, Pakistan.



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 09/05/2023

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

Subject: - REQUEST FOR REVIEW/APPRaisal

Reference to the Assistant Director (Estab), Elementary & Secondary Education, Khyber Pakhtunkhwa office letter bearing No. 18811, dated 11/04/2023 wherein it has been directed to withdraw the promotion order of twenty four/24 PSTs BPS: 12 to CT BPS: 15 in District Orakzai issued vide Notification of this office bearing No. 6660, dated 10-12-2020 to the extent of Serial No. 13 to 36, twenty four/24 in counting.

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

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

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

DISTRICT EDUCATION OFFICER-(M)

ORAKZAI

Copy of Even No. & Date:

Copy forwarded for information and necessary action to the:-

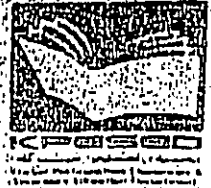
1. Deputy Commissioner, Orakzai.
2. Additional Director (Estab), Directorate of E&SE, MAs, Khyber Pakhtunkhwa, Peshawar.
3. Assistant Director (Estab), Directorate of E&SE, Khyber Pakhtunkhwa w.r.t his office letter vide cited above.
4. Office Copy.

DISTRICT EDUCATION OFFICER-(M)

ORAKZAI



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



Nn. 141 Dated 19/05/2023

OFFICE ORDER:

In compliance of the Directorate of Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar vide letter bearing No. 18811, dated 11-04-2022, the competent authority DEC (M) Orakzai is pleased to withdraw the promotion orders bearing Endst. 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 promotional order (sk). Furthermore, the following teachers are hereby adjusted in the schools mentioned against their names with immediate effect.

Sl	NAME	CURRENT PLACE OF POSTING	PLACE OF ADJUSTMENT
1.	Iqbal Hussain	GMS Sir Sam	GPS Dara Mala
2.	Khalida Jan	GMS Saif Feroz Khel	GPS Siro Koda
3.	Muhammad Yaqoob	GMS Yaqub Kandow	GPS Gark Khel
4.	Muhammad Hanif	GMS Mushi Bazar	GPS Bact Shekhan
5.	Nasceeb Rehman	GMS Bakra Lalai	GPS Gul Chidi
6.	Gul Karim	GMS Saif Feroz Khel	GPS Ghulak Ali Khel
7.	Dalil Shah	GMS Baxdi Khel	GPS Rangin Khel
8.	Mall Ur Rehman	GMS Avi Mala	GPS Dago Takhiot
9.	Gul Rahim	GMS Gulistan	GPS Khoo Koda N.
10.	Ashfaq Ali	GMS Khalil Sepoy	GPS Bal Kri
11.	Mashoon Khan	GMS Damber Lash	GPS Dhan Shakhra
12.	Syed Khairim Hussain	GMS Andkhi	GAIPS Shemar
13.	Ravne Akhtar	GMS Wamnam	GPS Karim Sher Khel
14.	Hussain Asghar	GMS Khalil Sepoy	GPS Khaz Khushin
15.	Munawar Khan	GMS Saif Derrah	GPS Arkan Kili
16.	Shere Hassan	GMS Mirko Payan	GPS Siddeman Kh
17.	Aunjad Khan	GMS Zanta Khel	GPS Taghis
18.	Syab Ur Islam	GMS Jarra District Kehal	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 Swara Kel	GPS Swara Kel
20.	Hussain Khan	GMS Swara Kel	GPS Khadril No.1
21.	Munawar Khan	GMS Chappor Mashil	GPS Zar Chappor
22.	Muhammad Ghani	GMS Sira Koda	Kel Ali Khel
23.	Parvaz Khan	GMS Barghan	Ghulak Ali Khel
24.	Iqbal Khan	GMS Dana Khuda	GPS Taptal Ali Khel

Note:

- 1) Fresh charge report in their original Basic Pay Scales as on 09-12-2020 should be submitted to a confirmed within 15 days proximately. In case of failure/refusal, they will be treated under the Khyber Pakhtunkhwa Govt. Servants' Discipline & Discipline Rules, 2011
- 2) TADA is not allowed for joining of their duties.

DISTRICT EDUCATION OFFICER (MALE)
 DISTRICT ORAKZAI

Copy of Form No. 4 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 SV 18, already transferred to District Kehal vide Directorate of E&SE KP No. 1382A-617, in SV Transfer Dated Peshawar the 27/11/2022.
- 2) Additional Director (Estab), Directorate of E&SE, MAJ, Peshawar
- 3) District Education Officer (M), District Yahal
- 4) District Monitoring Officer, EJA, District Orakzai.
- 5) District Accounts Officer, District Orakzai
- 6) Deputy DED (M), Orakzai.
- 7) Assistant Director (Estab), Directorate of E&SE, KP, Peshawar vide his office letter quoted above.
- 8) Principal/Head Master/In-charge HM and Head Teachers concerned.
- 9) SOEs concerned for further necessary action.
- 10) Superintendent/Pay Clerk D/O the DED (M) Orakzai for further necessary action.
- 11) Head Master/In-charge HM for necessary action.
- 12) POTS concerned.
- 13) Office Copy.

DISTRICT EDUCATION OFFICER (MALE)
 DISTRICT ORAKZAI

16- خدمت خراب ڈسٹرکٹ ایجوکیشن آفیسر ضلع اورکزئی

۱۱/۱۱/۲۰۰۹

خواب عالی

۹۴۷

سول - نظر ثانی اپیل برائے ڈیگریڈیشن آرڈر

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

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

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

یہ اساتذہ PSHT (15 سکیں) کے بھی حقدار تھے۔ چونکہ فائٹا میں CT سہی اسمیاں

زیادہ خالی تھیں۔ PSHT (15 سکیں) نہ ہوسا پیران اساتذہ کو CT پیر پوزیشن

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

خواب والد۔ اب ڈیوائس شال CT پیر گزارنے کے بعد ان اساتذہ کو CT (15 سکیں) سے دوبارہ

PST (15 سکیں) پیر ڈیگریڈ کیا گیا۔

لہذا اب جدھان کی شان اقدس میں گزارش کیجاتی ہے۔ کہ اس ڈیگریڈ آرڈر

پرنظر ثانی کر کے سائٹین کرالضاف دے کر مشکور فرمائیں۔

سین ڈارزش ہوگی۔ مورخہ 20/05/2023

copy to

1 - ڈی سی اورکزئی

2 - ڈی ای او اورکزئی

3 - ڈائریکٹر آف ایلیمنٹری اینڈ

سنڈری ایجوکیشن

4 - سیکرٹری ایجوکیشن کے پی کے

انعامین

DPC-2020

PST to CT

All teachers

Office of the District Education Officer, District District

317

Diary No. 2415/23

Dated 24/5/23

DISTRICT OFFICE

ORAZAI

۹۱۷

14A

Shamir امیر زمان (14)

Sajid نائب الامام (1)

Khanajee قائد زمان (15)

M. Mulk منور زمان (2)

Han نائب (16)

Aamir امیر زمان (3)

mn منور زمان (17)

Shah (4)

~~Shah~~ نائب (18)

Shah اقبال من (5)

Shah نائب (19)

Shah اتفاق علی (6)

Shah نائب (20)

Shah محمد یعقوب (7)

Shah نائب (21)

Shah مکین زمان (9)

Shah قتل کریم (22)

Shah شیرین زمان (10)

Shah منور زمان (23)

Shah محمد علی (11)

Shah نائب (24)

Shah امیر زمان (12)

Shah لائحه زمان (13)

- 16/B -

"F/1"



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

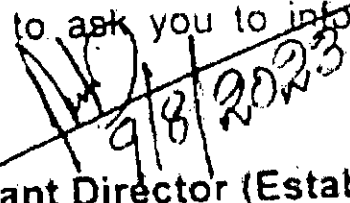
To

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

- 17 -

VAKALATNAMA
BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

_____ No _____ /20 _____

Muhammad Hameed (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 

ACCEPTED


NOOR MOHAMMAD KHATTAK
"ADVOCATE SUPREME COURT"


WALEED ADNAN


KAMRAN KHAN


UMAR FAROOQ MOHMAND


MUHAMMAD AYUB

&


MAHMOOD JAN
ADVOCATES

OFFICE:

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