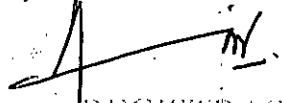


FORM OF ORDER SHEET

Court of _____

Appeal No. 1691/2023

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

The appeal of Mr. Shireen Hassan CT GMS Zera 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. 1647 /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 Honourable Bench (SB) for consideration/ decision.


Noor Muhammad KTK
ASC

1731
12/6/23

no 1860 / S T
04-07-2023

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 1691 /2023

SHIREEN HASSAN

V/S

EDUCATION DEPTT:

INDEX

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

APPELLANT

Through:

NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT

-1-

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL NO. 1691 /2023

Mr. Shireen Hassan, CT (BPS-15),
GMS, Zera, 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 annexureA&B.

4. That the appellant is a highly qualified person and his field. Copy of the educational testimonials are attached as annexureC.
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 annexureD.
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 annexureE.
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 annexureF.
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 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

Shireen Hassan

Through:


NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT


KAMRAN KHAN


UMAR FAROOQ


MUHAMMAD AYUB


WALEED ADNAN


MAHMOOD JAN

Advocates, Peshawar

AFFIDAVIT

I, Mr. Shireen Hassan, CT (BPS-15), GMS, Zera, 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

SHIREEN HASSAN

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:

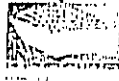
1. That, the titled appeal is submitted before this Honorable tribunal along with this application in which no date has been fixed yet.
2. That the applicant had filed the titled appeal against order dated 19.05.2023 whereby his promotion from PST to CT notification has been withdrawn.
3. That, all the 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

11A
35/4

Phone: 0925-690017 FAX: 0925-690017

Dated 24/10/2020

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

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

- | | |
|--|--------------------------|
| 1. Mr. Fareed Ullah Mehsud, District Education Officer | Chairman |
| 2. Mr. Hameed Ullhan Jan, Additional Director NMD | (KPE&SED Representative) |
| 3. Mr. Saif Ullah, Principal B-19 GHS Mandali District Orakzai | Member |
| 4. Mr. Muhammad Iqbal, HM GHS Mishti 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 Mishti | Member |

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

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

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

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

S. No.	Name of teacher	BP S	Date of Birth	Regular Service	Place of Posting	Remarks
1	Zeenat Ali	13	05/02/1970	01/03/1993	GPS Near All Garhi	
2	Amal Hassan	15	01/08/1970	23/05/1995	GPS Garhi Mani Khel	
3	Hussainullah	13	13/02/1972	31/03/2001	GPS Khawas Khel	
4	Ali Mojan	13	03/03/1979	01/09/2003	GPS Sarka	
5	Yasun Ullah	15	02/01/1980	01/09/2003	GPS Ankhel	
6	Munawwar Shah	15	10/03/1982	01/10/2003	GPS Sarla Misisli	
7	Abdul Shatoor	15	01/03/1972	23/10/2003	GPS Sarki Khel	
8	Samar Gul	15	01/01/1979	29/07/2004	GPS Sama Mamozai	
9	Khalid ur Rehman	15	05/06/1979	03/08/2004	GPS Saingra	
10	Muhammad Umer	15	22/04/1976	03/09/2005	GPS Taropi Ali Khel	
11	Mir Asghar	15	16/10/1984	05/09/2005	GPS Rambic Salal	
12	Waheed Ullah	15	03/02/1979	23/10/2005	GPS Khangar Daar	
13	Iqbal Hussain	12	05/05/1985	24/11/2009	GPS Bhand Khel No.3	
14	Khalida Jan Muhammad	12	01/03/1986	24/11/2009	GPS Mir Kalam Khel	
15	Yunus Muhammad	12	09/03/1987	24/11/2009	GPS Malang garhi	
16	Hamid Naveeb	12	21/12/1982	24/11/2009	GPS Bada Sherchan	
17	Rehman	12	05/10/1985	24/11/2009	GPS Gul Chert	
18	Gul Karim	12	15/01/1982	05/12/2009	GPS Bilazwi	
19	Dulil Shah	12	01/04/1980	24/11/2009	GPS Bazed Khel	
20	Muti Ur Rehman	12	20/03/1984	24/11/2009	GPS John Kada	
21	Gul Rahim	12	03/04/1979	24/11/2009	GPS Karapa Samaia	
22	Ashfaq Ali	12	18/05/1985	24/11/2009	GPS Char Khushita	
23	Muskeen Khan S. Khadim	12	10/04/1984	02/12/2009	GPS Taor Kani	
24	Hussain	12	03/05/1985	24/11/2009	GPS Stamer	
25	Rozay Akbar Hameem	12	15/02/1982	24/11/2009	GPS Zakhum	
26	Asghar Munawwar	12	10/02/1981	24/11/2009	GPS Palansi	
27	Khan	12	10/05/1986	24/11/2009	GPS h Jawar	
28	Sharon Hussain	12	09/10/1987	24/11/2009	GPS And Khel Bala	
29	Munawwar Hussain Soochi	12	15/02/1985	25/11/2009	GPS Beropi Ali Khel	
30	Ali Jan	12	20/01/1986	24/11/2009	GPS Prinjani Ali Khel	

3-6

303	Abdul Wahid	12	03/10/1982	24/11/2009	GPS Khadizai No.1
304	Hikmat Khan Munawar	12	02/16/1983	24/11/2009	GPS Sawara Kot GPS Chappal Mishli
306	Khan	12	25/10/1982	24/11/2009	
307	Muhammad Ghani	12	26/02/1983	24/11/2009	GPS Km Ali Khel
308	Paluda Khan	12	13/04/1984	23/11/2009	GPS Yusuf Khel
312	Israfil Khan	12	12/03/1986	24/11/2009	GPS Khadizai No.3

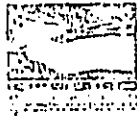
- 8 - 7

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
AEO Orakzai
Member
4. Kausar Ali
AEO Orakzai
Member
5. Mrs. Nabila Naz
AEO Orakzai
Member
6. Muhammad Iqbal (HM)
GHS Mishli Bazar
Member
7. Mr. Rais Khan
AEO Orakzai
Member
8. Saif Ullah Principal
GHS Mandall
Member
9. Farooq Ullah Khan
Additional Director NMD
KP E&SED Representative

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



District Education Office
District Orakzai

No: 6660
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	Ahmad 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 Alwarha Mela
4	157	Ali Majan	15	05/03/1979	01/09/2003	GPS Sarka Aakhe	GMS Tooli Bagh, Orakzai
5	160	Yasin Ullah	15	02/01/1980	01/09/2003	GPS Sarka Mishli	GMS Mishli Bazar
6	161	Munawar Shah	15	10/03/1982	01/10/2003	GPS Sarki Khel	GMS Inzer Patti
7	166	Abdul Shakoar	15	01/03/1972	23/10/2003	GPS Soma Mamozai	GMS Dron Shalkhan
8	169	Samar Gul	15	01/01/1979	29/07/2004	GPS Sangra	GMS Mishli Bazar
9	170	Muhammad Rehman	15	05/06/1979	03/08/2004	GPS Torapi Akh Khel	GMS Sarki Khel
10	178	Muhammad Umer	15	22/04/1976	03/09/2005	GPS Rambic Satal	GMS Gulistan
11	218	Mir Asghar	15	16/10/1984	05/09/2005	GPS Khangar Bazar	GMS Sarki Khel
12	219	Yahzee Ullah	15	02/02/1979	23/10/2005	GPS Biland Khel No.2	GMS Biland Khel
13	227	Ishtiaq Hussain	12	05/05/1985	24/11/2009	GPS Star Sam	GMS Star Sam
14	279	Enoista Jan	12	01/03/1986	24/11/2009	GPS Mir Kalam Khel	GMS Casim Khel, Orakzai
15	279	Muhammad Yaqoob	12	09/03/1987	24/11/2009	GPS Malang Garhi	GMS Yakh Kandar
16	280	Muhammad Hanif	12	21/12/1982	24/11/2009	GPS Beda Shalkhan	GMS Mishli Bazar
17	282	Museeb Rahman	12	05/10/1985	24/11/2009	GPS Gul Cheri	GMS Babera Lati
18	283	Gul Karim	12	15/01/1982	03/12/2009	GPS Bilazow	GMS Sofi Feroz Khel
19	284	Qazi Shah	12	04/04/1980	24/11/2009	GPS Bared Khel	GMS Mir Miski Shalkhan

(Signature)
District Education Officer
Orakzai District at Hangu

Regulation

Posted

20	285	Pehman	12	29/05/1984	24/11/2009	GPS Jaba Kadar	GHS Avi Mela
21	287	Gu Pahrn	12	05/04/1979	24/11/2009	GPS Karap Samana	GHS Gulistar
22	288	Ahmad 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 Toor Kur	GMS Damber Lasli
24	290	S.Khadim Hussain	12	03/05/1985	24/11/2009	GPS Shams	GHS And Khel
25	291	Raees Akbar	12	16/02/1982	24/11/2009	GPS Zakhlan	GHS Dran Sheikhan
26	293	Hussain Akhbar	12	10/02/1981	24/11/2009	GPS Palosi	GMS Khalil Sepoy
27	295	Minawar Khan	12	10/05/1986	24/11/2009	GPS Injwal	GHS Saifal Dara
28	298	Hassan	12	09/10/1987	24/11/2009	GPS And Khe Bala	GMS Zera
29	300	Arifad Khan	12	10/02/1985	25/11/2009	GPS Ilurapi All Khel	GMS Janku Khel
30	302	Saib Ullah	12	20/04/1986	24/11/2009	GPS Panjam All Khel	GMS Alwarha Mela
31	303	Amir ur Pehman	12	03/10/1982	24/11/2009	GPS Khadzai No.1	GHS Swara Kol
32	304	Hilmal Khan	12	02/10/1983	24/11/2009	GPS Sawara Kol	GHS Swara Kol
33	305	Minawar Khan	12	25/10/1982	24/11/2009	GPS Chapper Mishi	GMS Babera Laki
34	307	Muhammad Ghani	12	26/02/1985	24/11/2009	GPS Kol Ali Khel	GMS Damne Lasli
35	308	Painda Khan	12	13/04/1984	25/11/2009	GPS Yusuf Khel	GHS Bagh Nak
36	312	Israfil Khan	12	12/05/1986	24/11/2009	GPS Khadzai 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 be effect that if any over payment is made to him in light this order will be recovered and if he is wrongly promoted he will be reversed.

DISTRICT EDUCATION OFFICER
DISTRICT ORAKZAI

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

Copy forwarded for information and necessary action to the

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

~~SECRET~~
DISTRICT EDUCATION OFFICER
DISTRICT ORAKZAI

Serial No. 007639

Roll No. 34195

Registration No.
2009-PCKU-1206

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Kohat University
of Science & Technology, Kohat
(Pakistan)

①

Session ANNUAL, 2011

SHIREEN HASSAN

SON

of

ALI HASSAN

and a student

of OPANCAI AGENCY

having passed the prescribed

examination held in JUNE 2011, is this day admitted by

The Kohat University of Science & Technology, Kohat

in the Degree of

Bachelor of Arts

in the SECOND Division

The Examination was taken as a whole / in parts

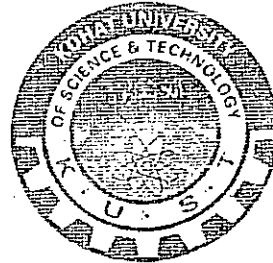
Controller of Examinations

Countersigned

CHANCELLOR

Vice Chancellor

Result declared on DECEMBER 22, 2014



Allama Iqbal Open University - 12 Islamabad



Certified that Mr./Ms. SHIREEN HASSAN

Son / Daughter of ALI HASSAN

Registration No. 11NKT00751

Roll No. AL656674

Semester SPRING 2012

having met all the requirements

under the semester system is this day awarded the

Certificate of Teaching

He/She has secured 55 % marks

and has been placed in B grade



Result declared on: January 16, 2013

Date of issue: April 29, 2020

CON. ROLLER OF EXAMINATIONS

Note: This Certificate is issued without alteration, erasure.
The detail of courses is overleaf.



"D" - 13 -

DIRECTORATE OF ELEMENTARY &
SECONDARY EDUCATION KHYBER
PAKHTUNKHWA PESHAWAR
F.NO.61/GENE. L 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 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

Endst: No. _____

Copy of the above is forwarded to the _____

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

Assistant Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa

Wahidullah
76/3/23



- 14 -

OFFICE OF THE DISTRICT EDUCATION OFFICER-(M)-ORAKZAI
DISTRICT HEADQUARTER ORAKZAI AT BABER MELA-HANGU
Phone # 0925-690017 Fax # 0925-690017
Email: deorakzal2020@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 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. 15 to 36, twenty four/24 in counting.

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

- 1) WHEREAS, the promoted PSTs have been appointed on 24/09/2009 as FST 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 then the promoted PSTs for promotion to the posts of CT BPS-15.
- 6) 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)
ORAKZAI

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.l his office letter vide cited above.
4. Office Copy.

DISTRICT EDUCATION OFFICER-(M)
ORAKZAI



7E - 15 -

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) ORAKZAI
DISTRICT HEADQUARTER ORAKZAI AT BABER MELA HANGU
 Phone # 0925-690017 Fax # 0925-690017
 Email: deorakzai2020@gmail.com
 No. 411 Dated: 19/05/2023



OFFICE ORDER:

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

S.N	NAME	CURRENT PLACE OF POSTING	PLACE OF ADJUSTMENT
1	Iqbal Hussain	GMS Sitar Sam	GPS Bara Kola
2	Khalida Jan	GMS Salfi Feroz Khel	GPS Sitar Kada
3	Muhammad Yaqoob	GMS Yakha Kandori	GPS Salfi Khel
4	Muhammad Hanif	GHS Nishu Bazar	GPS Bada Shelkhan
5	Maseeb Rehman	GMS Babra Laski	GPS Gul Cheri
6	Gul Karim	GMS Salfi Feroz Khel	GPS Ohufik Aji Khel
7	Dafid Shah	GHS Bazid Khel	GPS Rangin Khel
8	Mah Uz Rehman	GHS Avi Mela	GPS Dago Takhak
9	Gul Rahim	GHS Gulistan	GPS Khoo Kada Ni
10	Ashfaq Ali	GMS Khaili Sepoy	GPS Bcl Kol
11	Maskeen Khan	GMS Damber Lasu	GPS Oran Shelkhan
12	Syed Khadim Hussain	GHS Andhel	GMS Ghannar
13	Ragoo Akbar	GMS Wamparva	GPS Kagnaj Sabet Khel
14	Hussain Asghar	GMS Khaili Sepoy	GPS Khar Khushla
15	Munawar Khan	GHS Saifal Durrani	GPS Arkho Jili
16	Shirin Hassan	GMS Mirako Payan	GPS Suleman Khel
17	Amyad Khan	GMS Zanka Khel	GPS Taghmal
18	Saqib Ul Islam	GHS Jarna 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 Swara Kol	GPS Swara Kol
20	Mikmal Khan	GMS Swara Kol	GPS Khadizai No.
21	Munawar Khan	GHS Chopper Mishu	GPS Zar Chappu
22	Muhammad Ghani	GMS Sitar Kada	Kot Ali Kola
23	Paanda Khan	GHS Baghak	Ghulak Aji Khel
24	Israfil Khan	GMS Dana Khula	GPS Tarap Aji 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, possibly. In case of failure/refusal, they will be treated under the Khyber Pakhtunkhwa Govt Servants (Efficiency & Discipline) Rules, 2011.
- 2) TADA is not allowed for joining of their duties.

DISTRICT EDUCATION OFFICER (MALE)
DISTRICT ORAKZAI
 19/5/23

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 SM 18, already transferred to District Kohat vide Director to of E&SE KP No. 13668-B17, Ho 51, Transfer Dated Peshawar the 27/12/2022.
- 2) Additional Director (Estab), Directorate of E&SE, IAS, Peshawar.
- 3) District Education Office (M), District Kohat.
- 4) District Monitoring Officer, EMA, District Orakzai.
- 5) District Accounts Officer, District Orakzai.
- 6) Deputy DEO (M), Orakzai.
- 7) Assistant Director (Estab), Directorate of E&SE, KP, Peshawar vide his office letter quoted above.
- 8) Principal/Head Masters/Incharge HM and Head Teachers concerned.
- 9) SOEs concerned for further necessary action.
- 10) Superintendent Pay Clerk D/O the DEO (M) Orakzai for further necessary action.
- 11) Head Master (M) of the school concerned.
- 12) BTE concerned.
- 13) Office Copy.

DISTRICT EDUCATION OFFICER (MALE)
DISTRICT ORAKZAI

خدمت حجاب ڈسٹرکٹ ایجوکیشن آفیسر ضلع اور کزنٹی

حجاب عالی

۱۶-۹۴

امریکی
۱۱/۱۱/۲۰۰۹

معاون - نظر ثانی ایمیل برائے ڈیگریڈیشن آرڈر

گزارش محصور التورید 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 فاٹا میں SPST (14 سکین) کا کوئی پوسٹ نہیں ہے۔

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

زیادہ خالی تھیں۔ PSHT (15 سکین) نہ ہوئے۔ لیکن اساتذہ کو CT پر پروموشن

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

حجاب والدہ - آف ڈھائی سال CT پر گزارنے کے بعد ان اساتذہ کو CT (15 سکین) سے دوبارہ

PST (15 سکین) پر ڈیگریڈ کیا گیا۔

لہذا اب صاحبان کی شان اقدس میں گزارش کی جاتی ہے۔ کہ اس ڈیگریڈیشن آرڈر

پر نظر ثانی کر کے سائٹین کو الصاف دہ کر مشکور فرمائیں۔

عین گزارش ہوگی۔

مورخہ 20/05/2023

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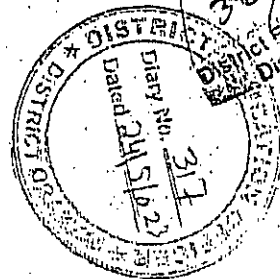
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2 - ڈی ای او اور کزنٹی

3 - ڈائریکٹر آف ایلیمنٹری اینڈ

سکنڈری ایجوکیشن

4 - سیکرٹری ایجوکیشن کے پی کے



DPC-2020

PST to CT

All teachers

Jemal اسرار افغان (14)

Sanjid شافق الاسلام (1)

Khanajee فائز افغان (15)

M. M. K. منور افغان (2)

H. H. شرف افغان (16)

A. A. احمد افغان (3)

M. M. منور افغان (17)

A. A. احمد افغان (4)

~~...~~ خالد افغان (18)

A. A. احمد افغان (5)

M. M. منور افغان (19)

A. A. احمد افغان (6)

M. M. منور افغان (20)

M. M. منور افغان (7)

M. M. منور افغان (21)

M. M. منور افغان (9)

M. M. منور افغان (22)

M. M. منور افغان (10)

M. M. منور افغان (23)

M. M. منور افغان (11)

M. M. منور افغان (12)

P. P. پانز افغان (13)

-16/B-

"F/1"



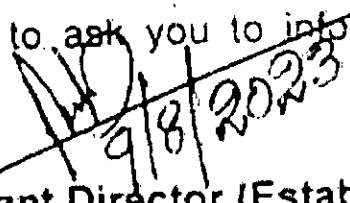
SECONDARY EDUCATION KHYBER
PAKHTUNKHWA PESHAWAR
P.NO. 61/DISTRICT CADRE TRANSFERS
NO. 22904 DATED 09-08/2023

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

Subject: - APPEAL FOR RESOTRATION OF PROMOTION ORDER.

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

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


Assistant Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa

Endst: No. _____ /F.No.37

Copy of the above is forwarded to the:-

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

Assistant Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa

-17-

VAKALATNAMA
BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

Appeal No 12023

Shireen Hassan
(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Education Dept
(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. / / 2023

CLIENT Shireen

ACCEPTED

NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT

Waleed
WALEED ADNAN

Kamran
KAMRAN KHAN

Umar
UMAR FAROOQ MOHMAND

Ayub
MUHAMMAD AYUB

&
Mahmood
MAHMOOD JAN
ADVOCATES

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