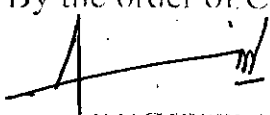


# FORM OF ORDER SHEET

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

**Appeal No.** 1688/2023

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. Munawar Khan 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. Munawar Khan CT GMS Babera 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. 1648 /S.T,

Dt. 9/6 /2023.

*A. M.*

REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Noor Muhammad Khattak Adv.  
High Court Peshawar.

R/sir; The departmental appeal of the appellant is already annexed with the appeal at page No. 16. So far as the rejection/appellate order is concerned the same has not been issued to the appellant as a separate order, rather the same has been issued/written on the face of D/A which is available at annexure-1 at page 16. Sir

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

*Noor Muhammad Khattak*  
Adv.

1731  
12/6/23

No 1860 / ST

04 07 - 2023

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR**

APPEAL NO. 1688 /2023

MUNAWAR 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

- 1 -

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

**APPEAL NO. 1688 /2023**

Mr. Munawar Khan, CT (BPS-15),  
GMS Babera, 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 07.08.2023 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 07.08.2023 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/PSM/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 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

  
**MUNAWAR KHAN**

Through:


  
**NOOR MOHAMMAD KHATTAK**  
ADVOCATE SUPREME COURT

  
**KAMRAN KHAN**

  
**UMAR FAROOQ**

  
**MUHAMMAD AYUB**

  
**WALEED ADNAN**

  
**MAHMOOD JAN**  
Advocates, Peshawar

**AFFIDAVIT**

I, Munawar Khan, CT (BPS-15), GMS Babera, 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

MUNAWAR KHAN

VS

EDUCATION DEPT.

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

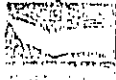
**R.SHEWETH:**

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 COURT



District Education Office  
District Orakzai

"A" - 6-5

No. 25/4

Phone 0925-690017 FAX 0925-650017

Date 17/10/2020

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 Farooq Ullah Mehsud, District Education Officer         | Chairman                 |
| 2. Mr. Hamced Ullhan Jan, Additional Director NMD             | (KPE&SEO 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. Nabila Naz, ADEO District Orakzai                     | Member                   |
| 8. Mr. Shakeel Ahmed, SST GHS Swaro Kot                       | Member                   |
| 9. Mr. Wahid Ullah, SCT GMS Bagara Mishli                     | Member                   |

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

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

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

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



S/L #	Name of teacher	BP S	Date of Birth	Regular Service	Place of Posting	Remarks
1	36 Zeem Ali	13	03/02/1970	01/03/1993	GPS Nour Ali Garhi	
2	66 Anwar Hussain	13	01/08/1970	23/05/1995	GPS Garhi Mani Khel	
3	126 Hussainullah	13	13/02/1972	31/03/2001	GPS Khawas Khel	
4	135 Ali Majid	13	05/03/1979	01/09/2003	GPS Sarka Ankhel	
5	160 Yasin Ullah	13	02/01/1980	01/09/2003	GPS Sarka Ankhel	
6	161 Shah	13	10/05/1983	01/10/2003	GPS Sarka Khel	
7	166 Anwar Shukran	13	01/03/1972	23/10/2003	GPS Suma Mamazai	
8	169 Samir Gani	13	01/01/1979	29/07/2004	GPS Sangra	
9	170 Karam	13	03/06/1979	03/08/2004	GPS Tarapi Ali Khel	
10	175 Gani	13	23/04/1976	03/09/2005	GPS Rambic Satat	
11	218 Mr Aschar	13	16/10/1984	05/09/2005	GPS Khai gar Boor	
12	219 Wahid Ullah	13	02/02/1979	23/10/2005	GPS Bhand Khel No 2	
13	277 Iqbal Hussain	12	03/03/1985	24/11/2009	GPS Sier Sam	
14	288 Khawar Jan	12	01/03/1986	24/11/2009	GPS Mir Kalam Khel	
15	289 Anwar	12	02/03/1987	24/11/2009	GPS Malang garhi	
16	280 Hanif	12	21/12/1982	24/11/2009	GPS Bada Sheikhani	
17	282 Rehman	12	05/10/1985	24/11/2009	GPS Gul Cherl	
18	283 Gul Farhan	12	13/01/1982	03/12/2009	GPS Bilazawi	
19	284 Dahir Shah	12	01/04/1980	24/11/2009	GPS Bazed Khel	
20	285 Rehman	12	20/05/1984	24/11/2009	GPS Jahn Kada	
21	287 Gul Rahim	12	05/04/1979	24/11/2009	GPS Karupa Samana	
22	288 Asghar Ali	12	18/05/1985	24/11/2009	GPS Khar Khuzhta	
23	289 Mushtaq Khan	12	10/03/1984	02/12/2009	GPS Turar Kent	
24	290 Hussain	12	03/03/1983	24/11/2009	GPS Shamer	
25	291 Razaq War	12	16/02/1982	24/11/2009	GPS Zakhtan	
26	293 Asghar	12	10/02/1981	24/11/2009	GPS Palaosi	
27	295 Kham	12	10/05/1986	24/11/2009	GPS Injwar	
28	298 Shaban Hussain	12	09/04/1987	24/11/2009	GPS Aul Khel Bala	
29	299 Anwar Khan	12	18/02/1985	25/11/2009	GPS Rerapi Ali Khel	
30	302 Kham	12	20/03/1986	24/11/2009	GPS Panjam Ali Khel	

-7-6-

- 8-7-

303	Abdur Rehman	12	03/10/1982	24/11/2009	GPS Khadzai No.1
304	Fikriddin Khan	12	02/10/1983	24/11/2009	GPS Sawaro Kot
306	Muhammad Khan	12	25/10/1982	24/11/2009	GPS Chopper Mishli
307	Muhammad Ghani	12	26/02/1983	24/11/2009	GPS Kari Ali Khel
308	Painda Khan	12	13/04/1984	25/11/2009	GPS Yusuf Khel
312	Israfil Khan	12	13/05/1986	24/11/2009	GPS Khadzai No.2

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

No. of CT (male) deferred for promotion = NIL

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

1. Wahid Ullah  
SCT GMS Bagara Mishli  
Member

2. Shakeel Ahmad  
SST GHS Swaro Kot  
Member

3. Mr. Abdul Malik  
ADEO Orakzai  
Member

4. Kausar Ali  
ADEO Orakzai  
Member

5. Mrs. Nabila Naz  
ADEO Orakzai  
Member

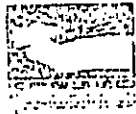
6. Muhammad Iqbal (HM)  
GHS Mishli Bazar  
Member

7. Mr. Rais Khan  
ADEO Orakzai  
Member

8. Saif Ullah Principal  
GHS Mandati  
Member

9. Hameed Ullah Jan  
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: 0925-696017 FAX: 0925-696017

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-13 against the vacant post in various schools mentioned against their names in district Orakzai with immediate effect in the interest of public service.

No.	Name of Teacher	BPS	Date of Birth	Regular Service	Current School	Name of the School where Posted
1			05/02/1970	01/03/1993	GPS Noor Ali Garhi	GMS Mirzai
2	Abulhasan	15	01/08/1970	23/05/1995	GPS Garhi Mani Khel	GMS Kalaya
3	Mansoor Khan	15	13/02/1977	31/03/2001	GPS Khawas Khel Sarka Aakhe	GMS Akwano Mani
4	Yasir	15	05/03/1979	01/09/2003	GPS Sarka Mishli	GMS Tooli Bazar Orakzai
5	Yasin Ullah	15	02/01/1980	01/09/2003	GPS Sarka Mishli	GMS Mishli Bazar
6	Munawar Shah	15	10/03/1982	01/10/2003	GPS Sarki Khel	GMS Inzer Patti
7	Abdul Shakoar	15	01/03/1972	23/10/2003	GPS Sama Mamozai	GMS Dron Sheikhan
8	Samar Gul	15	01/01/1979	29/07/2004	GPS Sangra	GMS Mishli Bazar
9	Khali ur Rehman	15	05/06/1979	03/08/2004	GPS Tarapl. Ali Khel	GMS Sarki Khel
10	Muhammad Umer	15	22/04/1976	03/09/2005	GPS Rambic Solai	GMS Gulistan
11	Ali Asghar Waheed	15	16/10/1981	05/09/2005	GPS Khangar Bazar	GMS Sarki Khel
12	Ullah	15	02/02/1979	23/10/2005	GPS Biland Khel No.2	GMS Biland Khel
13	Iqbal Hussain	12	05/05/1985	24/11/2009	GPS Sier. Sam	GMS Sier. Sam
14	Khaisla Jan	12	01/03/1986	24/11/2009	GPS Mir Kalam Khel	GMS Casim Bazar, Orakzai
15	Muhammad Yaqoob	12	09/03/1987	24/11/2009	GPS Malang garhi	GMS Yakhondow
16	Muhammad Hanif	12	21/12/1982	24/11/2009	GPS Bado Sheikhan	GMS Mishli Bazar
17	Museeb Rehman	12	05/10/1985	24/11/2009	GPS Gul Chen	GMS Babera Laki
18	Gul Karim	12	15/01/1982	03/12/2009	GPS Bilazawi	GMS Sadr Feroz Khel
19	Dalil Shah	12	04/04/1980	24/11/2009	GPS Bazed Khel	GMS Mir Akbar Sheikhan

District Education Officer  
Orakzai District, at Hangu.

20	225	Mall Jr Fahman	12	20/05/1984	24/11/2009	GPS Joba Kado	GHS Avi Melo
21	227	Gul Rahim	12	05/04/1979	24/11/2009	GPS Karapa Samana	GHS Gulistan
22	228	Ashfaq Ali Moskeen Khan	12	18/03/1985	24/11/2009	GPS Khar Khushla	GMS Khalil Sepov (Khura)
23	227	S. Khadim Khan	12	10/04/1984	02/12/2009	GPS Toor Ko	GMS Damber Lash
24	227	Mustan	12	03/05/1985	24/11/2009	GPS Shamer	GHS And Khel
25	228	Rasool Akbar Khan	12	16/02/1982	24/11/2009	GPS Zakhlar	GHS Dhan Sheikhan
26	228	Muhammad Khan	12	19/02/1981	24/11/2009	GPS Palansi	GMS Khalil Sepov
27	228	Muhammad Khan	12	15/05/1986	24/11/2009	GPS Injwar GPS And Khel	GHS Jaital Dara
28	228	Muhammad Khan	12	09/10/1987	24/11/2009	Bala GPS Durapi Khel	GMS Zera
29	228	Muhammad Khan	12	18/02/1985	25/11/2009	GPS Panjam A Khel	GMS Panki Khel
30	228	Muhammad Khan	12	20/04/1986	24/11/2009	GPS Khadiza No.1	GMS Alwarha Mela
31	228	Muhammad Khan	12	03/10/1987	24/11/2009	GPS Saware Kai	GMS Swara Kai
32	228	Muhammad Khan	12	02/10/1983	24/11/2009	GPS Chapper Mishli	GMS Swara Kai
33	228	Muhammad Khan	12	25/10/1982	24/11/2009	GPS Koi Ali Khal	GMS Babera Laki
34	228	Muhammad Khan	12	26/02/1985	24/11/2009	GPS Yusaf Khel	GMS Damber Lash
35	228	Painda Khan	12	13/04/1984	25/11/2009	GPS Yusaf Khel	GMS Bagh Nok
36	228	Wafiq Khan	12	12/05/1986	24/11/2009	GPS Khadizal 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

~~SECRET~~  
DISTRICT EDUCATION OFFICER  
DISTRICT ORAKZAI

(M)

# Kohat University

of Science & Technology, Kohat  
(Pakistan)

Session 2010-11

REGULAR

OF

ELIGIBLE GROUP I

SEMESTER I

AND A STUDENT

EXAMINATION HELD IN

\_\_\_\_\_

\_\_\_\_\_

HAVING PASSED THE PRESCRIBED

THE EXAMINATION HELD AT THE DEPT. OF SCIENCE & TECHNOLOGY, KOHAT

IN THE DEGREE OF

## Bachelor of Arts

IN THE \_\_\_\_\_ SECOND \_\_\_\_\_ DIVISION

THE EXAMINATION WAS TAKEN ~~BY~~ / IN PARTS

Controller of Examinations

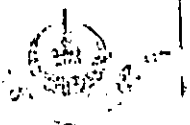
(Countersigned)

Result declared on

MAY 30, 2011



Vice Chancellor

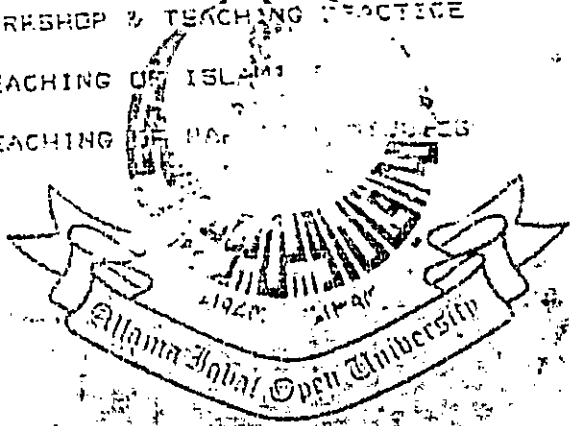


NO.  
REG.  
F.  
ADD.

2016/166

12

Code	Course Name	Marks	Obtained
	EDUCATIONAL PSYCHOLOGY	100	48
14-19	ALTERNATIVES OF EDUCATION	100	65
AUT-19	ISLAM, PAKISTAN AND MODERN HISTORY	100	65
AUT-19	EVALUATION, GUIDANCE & RESEARCH	100	81
SPR-15	WORKSHOP & TEACHING PRACTICE	100	82
SPR-15	TEACHING OF ISLAMIC EDUCATION	100	56
SPR-15	TEACHING OF HISTORY	100	54



CREDITS: 6

Total Marks / Obtained: 900 / 626

Result Declared on: JANUARY 14, 2016

Percentage / Grade: 70 / A

Date of issue: JANUARY 25, 2016

Controller of Examinations

Disclaimer: This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not confer 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 original record of the University/Institution.



"D"-13-

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 14535 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. 5661-69 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

*withheld allah*

*ADP  
26/5/23*





OFFICE OF THE DISTRICT EDUCATION OFFICER-(M)-ORAKZAI  
DISTRICT HEADQUARTER ORAKZAI AT BABER MELA HANGU

Phone # 0925-690017 Fax # 0925-6900

Email: [deorakzal2020@gmail.com](mailto:deorakzal2020@gmail.com)

No. 1344 Dated 08/05/23



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. 6560; 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 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.
- 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 in or district transfer/NOC and serving in District Kohat on the post of CT in BPS: 15.

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

DISTRICT EDUCATION OFFICER-(M)

ORAKZAI

Copy of Even No. & Date:

Copy forwarded for information and necessary action to the:-

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

DISTRICT EDUCATION OFFICER-(M)

ORAKZAI



7E - 15

**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)**  
**DISTRICT HEADQUARTER, ORAKZAI AT BABER MELA, HANGU**  
 Phone #: 0925-690017 Fax #: 0925-690017  
 Email: deoorakzai2020@gmail.com  
 No. 411 Dated 19/05/22



**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 Exds. 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 laid. 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.	Iqbal Hussain	GMS Star Sam	GPS Dargah
2.	Khalida Jan	GMS Saif Feroz Khel	GPS Star Sam
3.	Muhammad Yaqoob	GMS Yakha Kandow	GPS Star Sam
4.	Muhammad Hanif	GMS Mishi Bazar	GPS Baber Melakhan
5.	Naseeb Rehman	GMS Babra Laski	GPS Gulistan
6.	Gul Karim	GMS Saif Feroz Khel	GPS Dargah
7.	Dalit Shah	GMS Bazid Khel	GPS Baber Melakhan
8.	Mab Ul Rehman	GMS Aml Mela	GPS Dargah
9.	Gul Rahim	GMS Gulistan	GPS Kacra da Ha
10.	Ashfaq Ali	GMS Khalid Sepoy	GPS Baber Melakhan
11.	Maskeen Khan	GMS Damber Lasli	GPS Baber Melakhan
12.	Syed Khadim Hussain	GMS Andthel	GMS Baber Melakhan
13.	Rameez Akbar	GMS Wampawa	GPS Baber Melakhan
14.	Hussain Asghar	GMS Khalid Sepoy	GPS Baber Melakhan
15.	Munawar Khan	GMS Saif Darrah	GPS Baber Melakhan
16.	Shamir Hussain	GMS Nunko Payan	GPS Baber Melakhan
17.	Amjad Khan	GMS Zanta Khel	GPS Baber Melakhan
18.	Saqib Ul Islam	GMS Jarna Dhand Kehat	Will be adjusted as per when the later district order is withdrawn by the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa
19.	Amir Ul Rehman	GMS Swam Kot	GPS Swam Kot
20.	Hilmat Khan	GMS Swam Kot	GPS Swam Kot
21.	Munawar Khan	GMS Chapper Mishi	GPS Chapper Mishi
22.	Muhammad Ghani	GMS Siara Kada	Kot At Khel
23.	Princy Khan	GMS Baghnak	GMS Baghnak
24.	Saffi Khan	GMS Dann Khula	GPS Dann Khula

**Note:**

- 1) Fresh charge report in their original Basic Pay Scales as on 09-12-2020 should be submitted to concerned within 15 days positively. In case of failure/refusal, they will be treated under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011.
- 2) TAOs are advised for joining of their duties.

**DISTRICT EDUCATION OFFICER (MALE)**  
**DISTRICT ORAKZAI**

**Copy of Even No. & Date:**

Copy forwarded for information and necessary action to the:

- 1) Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar with a request to withdraw the District Transfer order in No. 18, already transferred to District Orakzai vide Directorate of E&SE KP No. 13658 of 11/12/2022.
- 2) Additional Director (Estab), Directorate of E&SE, MA, Peshawar
- 3) District Education Officer (M), District Orakzai
- 4) District Monitoring Officer, E&A, District Orakzai
- 5) District Accounts Officer, District Orakzai
- 6) Deputy DDO (M), Orakzai
- 7) Assistant Director (Estab), Directorate of E&SE, KP, Peshawar vide his office letter mentioned above.
- 8) Principals/Head Master/Incharge H/M and Head Teachers concerned.
- 9) SDOs concerned for further necessary action.
- 10) Superintendent Pay Clerk, D/O the DDO (M) Orakzai for further necessary action.
- 11) District Monitoring Officer (M) and necessary action.
- 12) DDOs concerned
- 13) Office Copy

**DISTRICT EDUCATION OFFICER (MALE)**  
**DISTRICT ORAKZAI**



16/A

Jamali

اسرار افغان (14)

Saeed

تاقب الاسلام (1)

Khanajev

فانسان (15)

M. Mulla

ملنگ ورفان (2)

H. H.

توت (16)

A. H.

احمد خان (3)

mn

منور خان (17)

A. H.

سید اختر (4)

~~...~~

سید خاتم (18)

A. H.

احسان مین (5)

...

رشدین (19)

A. H.

اتفاق علی (6)

...

نصیر (20)

Daniel

دلیل شاه (8)

محمد عارف (21)

M. M.

مکین (9)

گل سر (22)

M. M.

شرین (10)

M. M.

موقع (23)

M. M.

موسی (11)

A. H.

اسرار (12)

P. M.

لائے خان (13)

"16/B"

"F/1"



SECONDARY EDUCATION KHYBER  
PAKHTUNKHWA PESHAWAR  
F.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.

*W*  
*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

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

Appel No.          /2022

Manawar Khan (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.          /          /2022

**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 3<sup>rd</sup> Floor,  
Deans Trade Centre, Peshawar Cantt.  
(0311-9314232)