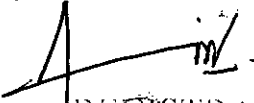


FORM OF ORDER SHEET

Court of _____

Appeal No. 1701/2023

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. Ashfaq Ali 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. Ashfaq Ali CT GMS Khalil Sepoy 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. 1642 S.T.

Dt: 9/6 /2023.




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 is at page 16. So far as the rejection / A. Order is concerned the same has not been issued/written on the face of D/O which is available at annex F page 16.

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. 1701 /2023

ASHFAQ ALI

V/S

EDUCATION DEPTT:

INDEX

S. NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of appeal	1-4.3
2.	Application for suspension	5-4
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. 1701 /2023

Mr. Ashfaq Ali , CT (BPS-15),
GMS Khalil Sepoy (Hujra), 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 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

Ashfaq Ali

Through:



NOOR MOHAMMAD KHATTAK


KAMRAN KHAN


UMAR FAROOQ


MUHAMMAD AYUB


WALEED ADNAN


MAHMOOD JAN
Advocates, Peshawar

AFFIDAVIT

I, Ashfaq Ali, CT (BPS-15), GMS Khalil Sepoy (Hujra), 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

ASHFAQ ALI

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

Date: 16/10/2020

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&SD Representative) |
| 3. Mr. Saif Ullah, Principal B-19 GHS Mandall District Orakzai | Member |
| 4. Mr. Muhammad Iqbal, TM 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. No.	S. I. #	Name of teacher	RP S	Date of Birth	Regular Service	Place of Posting	Remarks
1	16	Zaman Ali	15	03/02/1970	01/03/1981	GPS Noor Ali Garhi	
	66	Asad Ullah	15	01/08/1970	23/03/1985	GPS Gurbi Mann Khel	
	26	Ali Asghar	15	13/02/1972	31/03/2001	GPS Khawar Khel	
	111	H. Muneer	15	03/03/1970	01/09/2003	GPS Sarko	
	151	Yasir Ullah	15	02/01/1980	01/09/2003	GPS Ankhel	
	152	Muhammad	15	10/03/1982	01/10/2003	GPS Sarin Mithi	
	166	Abdul Shabir	15	01/03/1972	23/10/2003	GPS Sarki Khel	
8	169	Farooq Gul	15	01/01/1979	29/07/2004	GPS Sama Manzal	
9	170	Rehman	15	05/06/1979	03/08/2004	GPS Sangra	
10	178	Muhammad Umar	15	22/04/1976	03/09/2005	GPS Tarapi Ali Khel	
11	218	Ali Asghar	15	16/10/1984	05/09/2005	GPS Rambic Salai	
12	219	Wahed Ullah	15	02/03/1979	23/10/2005	GPS Khangar Baor	
13	277	Iqbal Hussain	12	03/03/1983	24/11/2009	GPS Biland Khel No.2	
14	278	Khairun Jan Muhammad	12	01/03/1986	24/11/2009	GPS Ster Sam	
15	279	Yaqoob Muhammad	12	09/03/1987	24/11/2009	GPS Mir Kalam Khel	
16	280	Hong Noor	12	21/12/1982	24/11/2009	GPS Malang garhi	
17	282	Rehman	12	05/10/1985	24/11/2009	GPS Badu Sheikhau	
18	283	Gul Karim	12	15/01/1982	03/13/2009	GPS Gul Chert	
19	284	Dalil Shah	12	04/04/1980	24/11/2009	GPS Bilazwi	
20	285	Muhammad Rehman	12	20/05/1984	24/11/2009	GPS Bazed Khel	
21	287	Gul Rahim	12	05/04/1979	24/11/2009	GPS Jaha Kada	
22	288	Ashfaq Ali	12	18/03/1985	24/11/2009	GPS Karapa Samina	
23	289	Muskeen Khan S. Khadim	12	10/04/1984	02/12/2009	GPS Khar Khushita	
24	290	Hussain	12	03/05/1985	24/11/2009	GPS Toor Kani	
25	291	Rozes Akbar	12	16/02/1982	24/11/2009	GPS Shamer	
26	293	Asghar	12	10/02/1981	24/11/2009	GPS Zakhlan	
27	293	Muhammad Khan	12	10/05/1986	24/11/2009	GPS Paloosi	
28	298	Shirin Hassan	12	09/10/1987	24/11/2009	GPS Injwar	
29	300	Amjad Khan	12	15/02/1985	25/11/2009	GPS And Khel Bala	
30	302	Sayid Ullah Islam	12	20/04/1986	24/11/2009	GPS Harapi Ali Khel	
						GPS Panjam Ali Khel	

8-6-

11	303	Abdur Rahman	12	03/10/1982	24/11/2009	GPS Khadizai No.1
12	304	Abbas Khan Phanwar	12	02/10/1983	24/11/2009	GPS Sawara Kot GPS Chapper Mishli
13	306	Khan Ahumamat	12	23/10/1982	24/11/2009	
14	307	Ghara	12	26/02/1985	24/11/2009	GPS Kot Ali Khel
15	308	Feroze Khan	12	13/01/1984	25/11/2009	GPS Yusuf Khel
16	312	Usaid 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. Wali-ud-Din
SCT GMS Bagara Mishli
Member

2. Shaukat Anwar
SST GHS Sawara 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 Mandall
Member

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

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



District Education Office
District Orakzai

No. 6660-9-8
Date 12/12/2020

Phone: 0925-690317 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 posts in various schools mentioned against their names in District Orakzai with immediate effect in the interest of public service:


Sr. No.	Name of Teacher	BPS	Date of Birth	Regular Service	Current School	In which school where posted
1	Abdul Ali	15	05/02/1970	01/03/1993	GPS Noor Ali Garhi	GMS Mirzai
2	Amal Hassan	15	01/08/1970	23/05/1995	GPS Garhi Mani Khel	GHSS Kalaya
3	Masoodullah	15	13/02/1972	31/03/2001	GPS Khawas Khel	GMS Akwarha Mota
4	Muhammad	15	05/03/1979	01/09/2003	GPS Sarka Aothe I	GMS Tooli Bagh, Orakzai
5	Yasin Ullah	15	02/01/1980	01/09/2003	GPS Sarka Mishi	GMS Mishi Begar
6	Munawar Shah	15	10/03/1982	01/10/2003	GPS Sarki Khel	GMS Inzer Palli
7	Abdul Shakoor	15	01/03/1972	23/10/2003	GPS Sama Mamozai	GMS Dron Shalkhan
8	Samar Gul	15	01/01/1979	29/07/2004	GPS Sangra	GMS Mishi Begar
9	Yhali ur Rehman	15	05/06/1979	03/08/2004	GPS Taropi Ail Khel	GMS Sarki Khel
10	Muhammad Umer	15	22/04/1976	03/09/2005	GPS Rambic Solai	GMS Gulistan
11	Ali Asghar	15	16/10/1984	05/09/2005	GPS Khangar Baar	GMS Sarki Khel
12	Yahmed Ullah	15	02/02/1979	23/10/2005	GPS Bland Khel No.2	GMS Bland Khel
13	Imad Hussain	12	05/05/1985	24/11/2009	GPS Star Sam	GMS Star Sam
14	Yhaisla Jan	12	01/03/1986	24/11/2009	GPS Mir Kalam Khel	GMS Qasim Khel, Orakzai
15	Muhammad Yaqoob	12	09/03/1987	24/11/2009	GPS Malang garhi	GMS Yakha Kandow
16	Muhammad Hanif	12	21/12/1982	24/11/2009	GPS Bada Shalkhan	GMS Mishi Begar
17	Raseeb Rehman	12	05/10/1985	24/11/2009	GPS Gul Cheri	GMS Bobera Lohi
18	Gul Karim	12	15/01/1982	03/12/2009	GPS Bilazawi	GMS Safi Feroz Khel
19	Qaif Shah	12	04/04/1980	24/11/2009	GPS Dazed Khel	GMS Mir Neki Shalkhan

(Signature)
District Education Officer
Orakzai District, Hangu

Sl. No.	Roll No.	Name	Age	Date of Birth	Date of Joining	Post	Remarks
20	285	Mohi Ur Rehman	12	20/05/1984	24/11/2009	GPS Jaba Koda	AS Avi Melo
21	287	Gul Rahim	12	05/04/1979	24/11/2009	GPS Karapa Samana	AS Gulistan
22	288	Ashfaq Ali	12	18/03/1985	24/11/2009	GPS Khar Khushla	AS Khalil Sapoy (Khura)
23	289	Maskeen Khan	12	10/04/1984	02/12/2009	GPS Toor Koni	AS Damber Garsi
24	290	S. Khadim Hussain	12	03/05/1985	24/11/2009	GPS Shamer	AS And Khel
25	291	Baqer Akbar	12	16/02/1982	24/11/2009	GPS Zakhlar	AS Dron Sheikhan
26	292	Maskeen Khan	12	10/02/1981	24/11/2009	GPS Palaosi	AS Khalil Sapoy
27	293	Maskeen Khan	12	10/05/1986	24/11/2009	GPS Injwar	AS Sailal Gora
28	294	Maskeen Khan	12	02/10/1987	24/11/2009	GPS And Khel Bala	AS Zera
29	295	Maskeen Khan	12	10/02/1985	25/11/2009	GPS Harpal All Khel	AS Janki Khel
30	296	Maskeen Khan	12	29/04/1984	24/11/2009	GPS Panjam Ali Khel	AS Alwarha Jala
31	297	Maskeen Khan	12	03/10/1982	24/11/2009	GPS Khadizal No.1	AS Swara Ko
32	298	Maskeen Khan	12	02/10/1983	24/11/2009	GPS Sowara Kal	AS Swara Ko
33	299	Maskeen Khan	12	25/10/1982	24/11/2009	GPS Chapper Mishli	AS Babera
34	300	Maskeen Khan	12	26/02/1985	24/11/2009	GPS Kai Ali Khel	AS Damber Garsi
35	301	Maskeen Khan	12	13/04/1984	25/11/2009	GPS Yusuf Khel	AS Bagh Noi
36	302	Maskeen Khan	12	12/05/1986	24/11/2009	GPS Khadizal No.2	AS 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 from 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 GRAKZAI

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 : S.E 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

(10)

2008-PCKU-1538

Kohat University of Science & Technology, Kohat (Pakistan)

ASHFAQ ALI

Session ANNUAL 2012

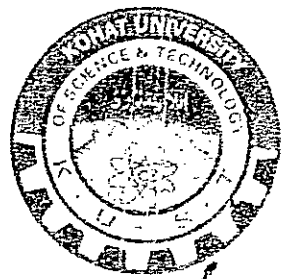
SON of SHER WALI

of ORAKZAI AGENCY and a student
examination held in JUNE 20 12 having passed the prescribed
JUNE 20 12, is this day admitted by

The Kohat University of Science & Technology, Kohat
to the Degree of
Bachelor of Arts
in the SECOND Division

The Examination was taken as a whole / in parts

11-11-12



Controller of Examinations

Countersigned

Vice Chancellor

Result declared on OCTOBER 25, 2012

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD



Serial No. 147489

PROVISIONAL RESULT CARD

Name: ASHFAQ ALI
 Father's Name: SHER MALI
 Address: TALIB KUNDI METHA ROAD P/O SHER KOT

-12-

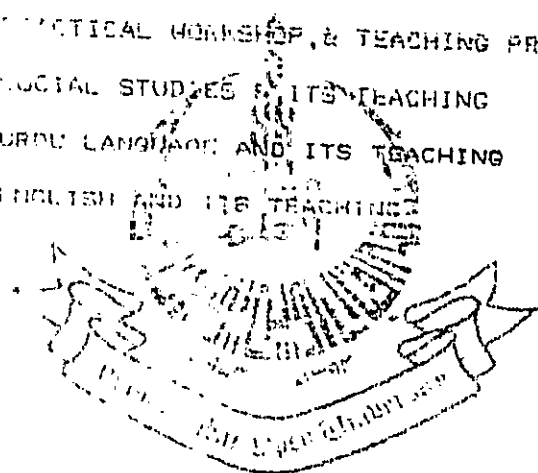
Roll No. AL660234
 Registration No. 11NK00863
 Final Semester AUT- 2013

Tehsil: KADAKAT
 District: PUNJAB

has successfully completed **CERTIFICATE OF TEACHING**

The detail of passed courses is as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
Aut-13	0611	COMPONENTS OF EDUCATION	100	62
Aut-13	0625	TEACHING STRATEGIES & EVALUATION	100	59
Aut-13	0626	EDUCATIONAL ORGANIZATION	100	60
Aut-13	0627	EDUCATIONAL PSYCHOLOGY	100	59
Aut-13	0635	ISLAMIC AND ITS TEACHING	100	54
Aut-13	0636	PRACTICAL WORKSHOP & TEACHING PRACTICE	100	96
Aut-13	0637	SOCIAL STUDIES & ITS TEACHING	100	52
Aut-13	0638	URDU LANGUAGE AND ITS TEACHING	100	63
Aut-13	0639	ENGLISH AND ITS TEACHING	100	63



CREDITS: 5

Total Marks / Obtained

900 / 558

Result Declared on JULY 03, 2014

Percentage / Grade

62 B

Date of issue AUGUST 06, 2014

(Signature)
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.



"D" -13-

DIRECTORATE OF ELEMENTARY &
SECONDARY EDUCATION KHYBER
PAKHTUNKHWA PESHAWAR
P.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 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 ^{all} such like cases, if any, and compliance report may be shared with this Office, please.

11/04/2023
Assistant Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa

Encls: No. _____

Copy of the above is forwarded to the

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

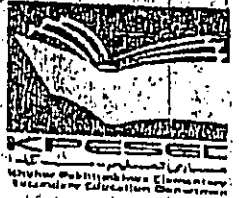
Assistant Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa

withheld allah
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: deorakzai2020@gmail.com



No. 1344 Dated 08/07/23

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 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 these PSTs in BPS: 12 have been promoted under Service Rules: 2012 the 60% share of SPS/PSMT 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



"E" - 15

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) ORAKZAI
DISTRICT HEADQUARTER ORAKZAI AT BABER MELA HAFI GU
 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. 18811, dated 11-04-2021, the competent authority DEO (M) Orakzai is pleased to withdraw the promotion orders bearing Encls: No. 5660, 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 ibid. 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 Sar Sani	GPS Baro Mela
2.	Khalifa Jan	GMS Saifi Feroz Khel	GPS Sora Kada
3.	Muhammad Yaqoob	GMS Yakhoo Kandori	GPS Barki Kohal
4.	Muhammad Hanif	GMS Mishu Bazar	GPS Bada Chalkher
5.	Naseeb Rehman	GMS Babra Laahi	GPS Gul Chah
6.	Gul Karim	GMS Saifi Feroz Khel	GPS Ghulak Ali Khel
7.	Dafni Shah	GMS Bazki Khel	GPS Rangin Khel
8.	Mah Ull Rehman	GMS Ayl Mela	GPS Daga Takhla
9.	Gul Rahim	GMS Gulistan	GPS Kheo Kada
10.	Ashiq Ali	GMS Khalil Sepoy	GPS Bal Kohal
11.	Maskeen Khan	GMS Damber Lasli	GPS Dinar Sakhra
12.	Syed Khadim Hussain	GHSS Andkhal	GMPS Ghazal
13.	Rames Akbar	GMS Wamban	GPS Kagnal Chalkher
14.	Muhammad Asghar	GMS Khalil Sepoy	GPS Idar Sakhra
15.	Munawwar Khan	GMS Saifi Darrak	GPS Aikhal
16.	Sajid Hassan	GMS Mirak Payan	GPS Suler Chalkher
17.	Amjad Khan	GMS Zanka Khel	GPS Taghri
18.	Saeed Ull Islam	GMS Jarra District Kohal	Will be revised and when the inter district transfer is withdrawn by the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa
19.	Amir ul Rehman	GMS Swara Kohal	GPS Swara Mela
20.	Himal Khan	GMS Swara Kohal	GPS Swara Mela
21.	Munawwar Khan	GMS Chapper Mishu	GPS Khapiz No.1
22.	Muhammad Ghani	GMS Sora Kada	GPS Zar Chapper
23.	Panda Khan	GMS Ragnak	Kot Aikhal
24.	Imam Khan	GMS Dana Khula	Ghulak Ali Khel
25.			GPS Tarag 1 Khel

- Note:
1. Fresh charge report in their original Basic Pay Scales as on 09-12-2020 should be submitted to me concerned within 15 days prudently. In case of failure/refusal, they will be treated under the Khyber Pakhtunkhwa Govt. Sanctions (Efficiency & Discipline) Rules, 2011
 2. TA/DA 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 in the:-
- 1) Director Elementary and secondary Education Khyber Pakhtunkhwa Peshawar with the request to withdraw inter district transfer order in the Sl 18, already transferred to District Kohal vide Directorate of E&SE KP No. 13604 SIF No 51 Transfer Dated Peshawar the 27/12/2022.
 - 2) Additional Director (Establish), Directorate of E&SE, IAS, Peshawar
 - 3) District Education Officer (M), District Kohal
 - 4) District Monitoring Officer, EMA, District Orakzai.
 - 5) District Accounts Officer, District Orakzai
 - 6) Deputy DEO (M), Orakzai.
 - 7) Assistant Director (Establish), Directorate of E&SE, KP, Peshawar vide his office letter quoted above.
 - 8) Principals/Head Masters/Incharge HM and Head Teachers concerned.
 - 9) BDOs concerned for further necessary action.
 - 10) Superintendent Pay Cell D/O the DEO (M) Orakzai for further necessary action.
 - 11) Head Master (Khalifa) for necessary action.
 - 12) BDO concerned
 - 13) Office Copy

DISTRICT EDUCATION OFFICER (MALE)
 DISTRICT ORAKZAI

خدمت عذاب ڈسٹرکٹ ایجوکیشن آفیسر ضلع اورنگزی

عذاب عالی

۱۶-۹۴

ایجوکیشن
۱۶/۱۱/۲۰۲۳

عنوان - نظر ثانی اپیل برائے ڈیگریڈیشن آرڈر

گزارش محوزہ لوریہ ہے۔ کہ ہمارا آرڈر بطور PST (23/11/2009) کو ہوا تھا۔ گیارہ سال بعد ان PST اساتذہ کو DPC 10-12-2020 میں CT پر ترقی دیا گیا۔ چونکہ فائٹ میں SPST (14 سکین) کا کوئی پوسٹ نہیں ہے۔ یہ اساتذہ PST (15 سکین) کے بھی حقدار تھے۔ چونکہ فائٹ میں CT سہی اسامیان زیادہ خالی تھیں۔ PSHT (15 سکین) نہ ہوئے۔ پھر ان اساتذہ کو CT پر ترقی دیا گیا۔ چونکہ C to PST کا 60% کوٹہ ہے۔

عذاب ذالہ - اب ڈھائی سال CT پر گزارنے کے بعد ان اساتذہ کو CT (15 سکین) سے دوبارہ PST (12 سکین) پر ڈیگریڈ کیا گیا۔

لہذا اب عذاب کی شان اقدس میں گزارش کی جاتی ہے۔ کہ اس ڈیگریڈیشن آرڈر پر نظر ثانی کر کے سائٹیں کو اصفح رہے کہ شکور فرمائیں۔

مورخ 20/05/2023

عین نوازش ہوگی۔

copy to

1 ڈی سی اورگنائز

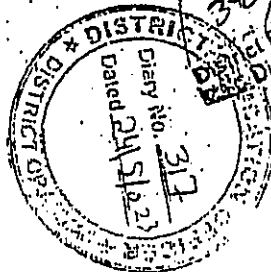
2 ڈی ای او اورگنائز

3 ڈائریکٹر آف ایلیمنٹری اینڈ

سنڈری ایجوکیشن

4 سیکرٹری ایجوکیشن کے پی کے

العارضین
Office of the District Education Officer
District Office
DPC-2020



PST to CT
All teachers

1 شاقب الاسلام (14) 16/A - Sanjid Jamali
اسرار احمد خان

2 منور خان (15) M. milk
Khanjari خان

3 احمد خان (16) Amir
H. Khan خان

4 شير احمد خان (17) Shir Ahmad Khan
منور خان

5 اقبال سين (18) A. Iqbal
~~Shir Ahmad Khan~~ خان

6 اصفاء علي (19) A. Iqbal
خان

7 محمد يعقوب (20) M. Yaqub
خان

8 ديل شاه (21) D. Shah
خان

9 مكن خان (22) M. Khan
خان

10 شيرين خان (23) M. Shirin
خان

11 محمد علي (24) M. Ali
خان

12 امير احمد خان (25) A. Ahmad
خان

13 لائحه خان (26) P. Laila
خان

- 16/B-

"F/1"



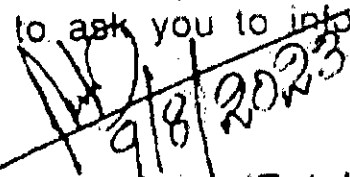
SECONDARY EDUCATION KHYBER
PAKHTUNKHWA PESHAWAR
P.NO. 61/DISTRICT CADRE TRANSFERS
NO. 22964 DATED 09-08/2023

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

Subject: - APPEAL FOR RESOTRATION OF PROMOTION ORDER.

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

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


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 /2023

Ashfaq Ali

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Education Deptt

(RESPONDENT)
(DEFENDANT)

I/We Appelant

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

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)