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BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. 1052/2023

Dr. Muhammad Amin

VS

Government of KPK

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Deponent

Dr. Khalid Saeed Akbar 12101-0899674-5

0343-903-3399

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. 1052/2023

Dr. Muhammad Amin

VS

Government of KPK

PARA WISE COMMENTS ON BEHALF OF RESPONDENTS

Respectfully Sheweth

- 1) That the appeal is not maintainable and incompetent in the eyes of Law in the present form.
- 2) That the appellant is estopped due to his own conduct to file this appeal.
- That the appellant has got no cause of action and locus standi to file instant appeal.
- 4) That the appellant has not come to this Honourable Tribunal with clean hands and has suppressed all relevant facts.
- 5) That the appeal is bad for mis-joinder and non-joinder of necessary parties.
- 6) That the Honourable Service Tribunal has no jurisdiction to entertain the instant appeal in its present form.
- 7) That the appeal has been mis-oriented, mis-constructed and mistakenly drawn and is incompetent in its present frame and context, and is liable for Rejection.
- 8) That the appeal is weak having no force, fabricated, fictitious, based on ill will, malafide and having no footings in the eyes of law.
- 9) That proceeding with the instant appeal would be a futile exercise and just wastage of the precious time of this Honourable Tribunal.
- That as stated in the objections supra, the appeal is bereft of cause of action and is liable for dismissal.

Objections on Facts

- 1) Para pertains to the academic qualification of the appellant, hence need verification.
- 2) Para pertains to the service record of appellant and appointment of appellant as Subject Specialist BS-17 in the respondent department in the year 2011, hence need no comments.
- 3) This para is related to the study leave for the purpose of PhD education. The appellant remained abroad w.e.f 24.08.2014 to 15.07.2018. The notification annexed with the present service appeal does not reflect leave with full pay.

- 4) Para pertains to the rejoining of appellant after completion of his PhD Degree. Appellant resumed his charge of post w.e.f 1.07.2018. Further appellant discussed different dates of Provincial Selection Board meeting dated 17.09.2018, 26.12.2018, 17.05.2019, during these PSB meetings the dossier of appellant was incomplete due to want of ACRs as appellant remained abroad on study leave. Hence appellant was not entitled for promotion in these Provincial Selection Board meetings. Furthermore the case of appellant was placed before the PSB in meeting dated 23.09.2019 and the case of appellant was deferred due to incomplete dossier as the appellant joined the respondent department in the month of July 2018 thus no PERs of appellant were written. The case of appellant was deferred due to incomplete dossier.
- for the period of 04 years, thus he was not entitled for promotion during this period. The respondent department promoted all the eligible employees from BS-17 to 18 on the recommendations of <u>Provincial Selection Board</u>. Hence the respondent department rightly promoted the officers from BS-17 to 18 in the light of seniority list.
- 6) Incorrect / not admitted. As the appellant had rejoined his service w.e.f July 2019. Therefore, he is required to complete one academic year for promotion to the next higher scale. As the appellant had completed his academic year on 31.12.2029, the officer concerned had written the ACRs/PERs of appellant on 31.12.2020. Hence the dossier of appellant becomes completed on 31.12.2029. In the light of Section IV(a) of Promotion Policy 2009, "the civil servants who are on long leave i.e. one year or more, whether within or outside Pakistan, may be considered for promotion on their return from leave after earning one calendar PER"
- 7) Incorrect / not admitted. The appellant was promoted to the BS-18 on the recommendations of PSB vide its meeting dated 13.12.2022. It is further added that after completion of dossier of appellant the case of the appellant was placed before the PSB and PSB recommended the appellant for promotion to BS-18 with immediate effect because in the light of Promotion Policy 2009, promotion is always with immediate effect.
- 8) That the appellant filed representation dated 10.01.2023 against the promotion order dated 13.12.2022. The representation of appellant did not base on legal footing. The appellant was promoted to BS-18 vide PSB meeting dated 13.12.2022 on his own turn and merit. No discrimination had been made with

- the present appellant. The appellant was promoted to BS-18 in the light of Promotion Policy 2009 under section IV(a) and V(e).
- 9) Incorrect / not admitted. Appellant filed representation dated 11.01.2023, the grounds in the representation does not confer any useful right of the appellant. As appellant was aggrieved from the PSB meeting dated 17.09.2018, 26.12.2018, 17.05.2019 & 23.09.2019 whereas appellant rejoined his service in July 2018 after completion of his study leave. The appellant remained abroad w.e.f 24.08.2014 to 15.07.2018. The service appeal of the appellant is an exercise in futility. Further proceeding in this regard would bear no fruit. It is, therefore, requested to this Honourable Tribunal to dismiss the Service Appeal of the appellant with heavy cost as the appellant was not entitled for promotion on above mentioned PSB meeting.

Objections on Grounds

- 1. Incorrect / not admitted. The act of the respondents was according to law, rules and policies, based upon the natural principle of justice. Appellant was promoted to BS-18 on the recommendations of PSB. It is further added that the Provincial Selection Board had recommended the appellant for promotion in the light of Promotion Policy 2009.
- 2. Incorrect and not admitted. Strongly denied. The appellant was treated by the respondent department as per law. The action of respondent department was according to the Constitution of the Islamic Republic of Pakistan 1973 but the claim of the appellant was against the law, rule and policies of the Government. In the year 2018 appellant was abroad, in the light of Promotion Policy 2009, if an officer is abroad then he is not entitled for promotion to the next higher grade/scale. In the light of Promotion Policy 2009, appellant was not entitled for promotion in Provincial Selection Board meeting dated 17.09.2018, 26.12.2018, 17.05.2019 & 23.09.2019. The Section IV(a) of the Promotion Policy 2009 is reproduced as under;

"The civil servants who are on long leave i.e. one year or more, whether within or outside Pakistan, may be considered for promotion on their return from leave after earning one calendar PER. Their seniority shall, however, remain intact"

3. Incorrect / not admitted. Strongly denied. This para is misleading. Appellant does not come in the domain of Section V(d) of Promotion Policy 2009. The Section V(d) is related to the dispute of seniority. The seniority of appellant was not disputed, his seniority remained intact. The appellant come in the domain of

Section V(e) of the promotion policy 2009. The Section V(e) is reproduced as under;

"If a civil servant is superseded he shall not be considered for promotion until he earns one PER for the ensuing one full year"

It is further added that the appellant himself admitted that he remained abroad therefore the respondent department continued the process of promotion thus the junior to the appellant were rightly promoted to the next higher grade. No discrimination had been made with the present appellant.

- 4. Incorrect / not admitted. Strongly denied. The appellant remained out of country therefore his case for promotion was deferred. As and when appellant rejoined his service and in the light of Section V(e) appellant was required to complete one PER of one complete year. As the appellant had rejoined his service w.ef July 2018, then according to Section V(e) the appellant earn one complete PER w.e.f 01.01.2019 to 31.12.2019. Therefore, appellant was not entitled for promotion in the PSB meeting dated 17.09.2018, 26.12.2018, 17.05.2019 & 23.09.2019 due to the reason of incomplete dossier.
- 5. Incorrect / not admitted. The promotion case of appellant was placed before the Provincial Selection Board in the year 2018 & 2019 and deferred due to the reason that the appellant was abroad and his dossier was incomplete. Hence in the light of Promotion Policy 2009 he was not entitled for promotion. Appellant was not ignored his case for promotion was placed before the each PSB meeting and his case was deferred due to the reason discussed above.
- 6. Incorrect, hence strongly denied. At the time of PSB meeting dated 23.09.2019, the appellant was not entitled for promotion under Section V(e) of the promotion policy 2009. In the light of PSB meeting dated 23.09.2019 all the eligible employee of the respondent department were promoted to the next higher grade. This act of the respondents cannot be declared against the law on any ground whatsoever but the straight away rejection of present Service Appeal.
- 7. Incorrect / not admitted. The claim of the appellant is totally illegal and against the law. All the vacant vacancies were filled according to the seniority list as per prescribed rules for promotion. No one can be promoted against the law, rule and policy of the Government.
- 8. Incorrect / not admitted. The appellant was treated according to the Constitution of the Islamic Republic of Pakistan. No discrimination had been

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made with the present appellant. Appellant was promoted on his own turn and merit in the light of Promotion Policy 2009.

- 9. Incorrect / not admitted. As discussed above.
- 10. Incorrect / not admitted. Appellant was treated as per Article 25 of the Constitution of the Islamic Republic of Pakistan. As and when dossier of the appellant completed then he was promoted to the next higher scale BS-18 on his own turn and merit.
- 11. Incorrect / not admitted. The appeal of the appellant is incompetent and liable to be dismissed with heavy cost.
- 12. It is requested to this Honourable Tribunal to club the 2nd service appeal of the appellant with present service appeal for the best interest of justice.
- 13. The counsel for respondents may kindly be allowed to raise additional grounds at the time of arguments.

Pray

It is, therefore, requested to this Honourable Tribunal to dismiss the Service Appeal of the appellant with cost because the Service Appeal of the appellants is only an exercise in futility and further proceeding in this regard would bear no fruit. It is further requested that the claim of appellant is against the law, rule and policies of the Government hence present service appeal of the appellant is liable to be dismissed with cost.

Secretary to the Govt: of Glyber Paking khwa Elementary & Secondary Education Department

> Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. 1052/2023

Dr. Muhammad Amin

VS

Government of KPK

Affidavit

I, Dr. Khalid Saeed Akbar representative of respondent department do hereby solemnly affirm and declared on oath that the contents of above mentioned service appeal are correct to the best of my knowledge and nothing had been concealed from this Honourable Tribunal.

> Dr. Khalid Saeed Akbar 12101-0899674-5

0343-903-3399



BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. 1052/2023

Dr. Muhammad Amin

VS

Government of KPK

Authority

I, District Education Officer (M) DIKhan Respondent No. 3 do hereby authorized Dr. Khalid Saeed Akbar representative of Directorate and Secretariat of Elementary & Secondary Education Department Khyber Pakhtunkhwa Peshawar to attend this Honourable Service Tribunal KP Peshawar on behalf of respondents in connection with submission of para wise comments and till the decision of the service appeal.

Respondent No. 3

District Education Officer (Male) DIKhan



GOVERNMENT OF KHYBER PAKHTUNKHWA ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar Phone No. 091-9223533 Email: sschoolmale@gmail.com

Peshawar: Dated13th December, 2022.

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NO.SO(SM)E&SED/3-1/2022/Promotion BS-17 to BS-18:- The Competent Authority on the recommendations of the Provincial Selection Board in its meeting held on 18-11-2022 is pleased to promote the following Head Masters/Subject Specialists (BS-17) to Principals/V.Principals/Senior Subject Specialists (BS-18) Teaching Cadre (Male) on regular basis, with immediate effect:-

	S.No	Name of Officer	S.No	Name of Officer	S.No	Name of Officer
Ī	ر .1	Irshad Hussain	32	Gul Dayub Khan	63	Qadeer ullah
₹ 2	(2)/	Dr. Muhammad Amin	33	Haziq ur Rehman	64	M.Aziz Ud Din Khan
	3.	Dr. Muhammad Shakeel	34	Ahmad Ghazi ud Din	65 ;	Shalil Nawaz
	4.	Adalat Khan	35	Siraj Khan	66	Muhammad Tarig
	5.	Akhtar Zaman	36	Wahid Jan	67	Afsar Khan
	6.	Hashmat Ali	37	Syed Attaullah Jan	68	Hafiz Mohammad Ali
	7.	Akbar Jan	38	Hastam Khan	69	Syed Adnan Ahmad
	8.	Qaisar Shah	39	Shoaib Gul	70	Muhammad Nasim
	9.	Muhammad Tayyab	40	Zarif Shad	71	Haji Rehman
	10.	Inam Ullah	41	Ghani Khan	72	M. Altaf Khan
;	11.	Imran Hameed	42	Malik Muhammad Kalim Zeb	73	Tariq Ur Rehman
	12.	Shah Nawaz Khan	43	Muhammad Athar	74	haider Ali Khan
	13.	Muhammad Kashif Khan	44	Amjad Hussain	75	Muhammad Zahoor
	14.	Muhammad Ishaq	45	Zubair Ali Khan	76	S.Misbah Ur Rehman
	15.	Hashmat Ullah Khan	46	Tahir Ullah Jan	77	Muhammad Daud
	16.	Saeed Ahmad	47	Asad Ali	78	Naseer Ullah
	170	Tariq Ali	48	Muhammad Sajjad	79	Liaqath Ali
٠	18.	Anwar Khan	49	Shafi Ullah	80	Khan Zeb
:	· 19.	Shan Ullah Khan	50	Attaullah	81	Israr Ahmad
	20.	Muhammad Riaz	51	Abdul Jalal	82	Muhammad Faroog
	21.		52	Iltaf Hussain	83	Israr Zamin Shah
	22.	Farmanullah	53	Muhammad Saeed	84	Imran Khan
	23.	Ibad Ullah	54	Muhammad Asif	85	Ghulam Dastagir
	24.	······································	55	Muhammad Sajid	86	Zia ul Islam
;	25.	Munammad Nasım	56	Muhammad Ayaz	87 '	Muhammad Arshad Iqbal
	26.	Munammad Zubair Khan	57	Muhammad Ismail	88	Muhammad Shakoor
	27.		58	Abdul Waheed	89	Umar Faroog
	28	Zarar iqbai	59	Abdul Basit Siddiqui	90	Farooq Zamir\
	29			Sultan-ud-Din	91	Hidayat Hussain
	30	Shabbir	61	Mian Abdul Malik	92	Murad Khan
	. 31	Nadeem Akbar	62	Muhammad Nasir Khan	. 93 .0	Akbar Hussain



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220	Muhammad Rafiq	235	Hidayyat Ullah	250	Yasir Ali Khan
± 221.	Sher Bahadar Khan	236	Muhammad Rafi	251	Muhammad Suleman
222.	Irshad Ahmad	237	Muhammd Gul	252	Fazal Subhan
223.	Muhammad Zahir	238	Samiul Wahab	253	Sharif Khan
224.	Isa Khan	239	Atif Malik	254	Zahoor Uliah
2 2 5.	Atta Ullah	240	Muhammad Nadeem Danish	255	Javed Khan
226.	Iftikhar Ahmad	241	Sher Ali Khan	256	Arshad Ali
227.	Fazli Rabbi	242	Ahmad Ali Shah	257	Khalid Mahmood
228	Ashfaq Ali	243	Sultan Yousaf	258	M. Anwar Khan
229	Qazi Sajid Rashid	244	Zia Ur Rehman	259	Muhammad Aslam
230	Hussan Farosh	245	Masood Nabi	260	Zahoor ul Islam
231	Alamzeb	246	Rizwan ullah	261	Atta ur Rehman Amjid
232	Muhammad Riaz	247	Hafiz Kaleem Ullah Jan	262	Arif Shah
233	Abdur Rashid	248	Saleem Ullah Khan	263	Sarbiland Khan
234	Haq Nawaz	249	Munsif Khan	264	Muhammad Javed

- The officers on promotion will remain on probation for a period of one year, in terms of Section-6 (2) of Khyber Pakhtunkhwa Civil Servant Act, 1973 read with Rule-15 (1) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989 and extendable for another one year with specific orders of Appointing Authority within two months of the expiry of first year of probation period as provided in Rule-15 (2) of Rules ibid.
- 3. The posting/transfer Notification in respect of the above officers will be issued later on.

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA

E&SE DEPARTMENT

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa Peshawar.

2 Director, E&SE Khyber Pakhtunkhwa, Peshawar.

3. District Education Officer (Male), Concerned.

4 District Accounts Officer, Concerned.

5. PS to Minister E&SE Department, Khyber Pakhtunkhwa.

6. PS to Secretary E&SE Department, Khyber Pakhtunkhwa.

7. PA to Additional Secretary (Estab) E&SE Department.

8. Director, EMIS E&SE Department.

9. Officers concerned.

10. Office Order file.

Attested to be true copy

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(NASEER ABBAS KHALIL) SECTION OFFICER (SCHOOLS MALE) Page No. (bd7)
See S. No. 32 & 37.

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GOVERNMENT OF KHYBER PAKHTUNKHWA ESTABLISHMENT DEPARTMENT

NO. SO(PSB)ED/1-4/2019/P-190 Dated Peshawar, the 24.05.2019

To

The Secretary to Govt. of Khyber Pakhtunkhwa, Elementary & Secondary Education Department

SUBJECT: - MINUTES OF THE MEETING OF PROVINCIAL SELECTION BOARD HELD ON 17:05:2019

PROMOTION OF TEACHING CADRE OFFICERS FROM BS-17 TO BS-18.

Dear Sir.

I am directed to refer to E&SE Department letter No. SC(SM)E&SED/3-2/2019/Promotion/BS-17 to 18 dated 15.05.2019 on the subject and to forward herewith an extract of <u>Additional item No. (5)</u> of the minutes/recommendations of the meeting of Provincial Selection Board held on <u>17.05.2019</u> as well as copy of approved summary wherein the Chief Minster being competent authority in terms of Rule 4 (1) (a) of the Khyber, Pakhtunkhwa (Appointment, Promotion & Transfer) Rules, 1989 has approved the recommendation of the PSB for further

necessary action.

Yours faithfully,

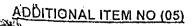
(Abdul Hameed) SECTION OFFICER (PSB)

Encl: As Aboye

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ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

(Meeting of PSB held on 17.05.2019)

Subject:

PROMOTION FROM BS-17 TO BS-18 (MALE) TEACHING CADRE.

Secretary E&SE apprised the Board that due to creation & retirement 102 posts of BS-18 Officers of teaching cadre are lying vacant.

- 2. According to service rules the post is required to be filled as under:-
 - "Eighty percent by promotion on the basis of seniority cum fitness from amongst Headmasters Government High Schools/Subject Specialists/Government Comprehensive High School/Government Higher Secondary Schools and others equivalent posts in BS-17 with five years' service as <u>such</u>; and
 - ii. Twenty percent by initial recruitment"

The service record of the officers included in the panel was discussed as follows:

		•	· *
	S.#	NAME OF OFFICER	RECOMMENDATIONS OF THE BOARD
r	1	Mr. Muhammad	His date of birth is 05.04.1967. He joined government service on
		Faroog Khan	07.10.1995 and was promoted to BS-17 on 25.11.1999. His
l		. سه	PERs for the year 2008 to 2018 are not available.
ľ		Albertack	
Ì		Section Ofalte (751)	
	Cov.	of Khyber Pakhlunkhwa	The Board recommended to defer his promotion.
1	Fs	ablishment Dopartment	The board recommended to deter his promotion,
Ī	2.	Mr. Inayat ur Rehman	His date of birth is 12.04.1969. He joined government service on
		,	24.07.1993 and was promoted to BS-17 on 25.05.2000. His
ľ	-		PERs for the year 2008 to 2018 are not available.
1		. ;	, , , , , , , , , , , , , , , , , , , ,
1			
		,	The Board recommended to defer his promotion.
4	3.	Mr. Amjad Ali	His date of birth is 10.02.1972. He joined government service on
1			26.05.1999 and was promoted to BS-17 on 24.05.2018. His
		· / .	PERs for the year 2008 to 2018 are not available.
			'
			The Board recommended to defer his promotion.
	,	,	
1	4.	Mr. Abdul Shakoor	His date of birth is 17.04.1976. He joined government service on
:	ĺ		05.11.2003 and was promoted to BS-17 on 23.07.2005. His
			PERs for the year 2008 to 2018 are not available.
	1		1.

Section (fi Schools)

Education Leant

Hyber Pakhtunkhwa

Attested to C.P.S.

PSB-meeting held on 1	7,0	15.	21	"	ı	9
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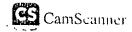
A		PSB-meeting held on 17.05, 2019
1		
		The Board recommended to defer his promotion.
5.	Mr. Noorani Sher	His date of birth is 05.01.1962. He joined government service on 19.09.1990 and was appointed to BS-17 on 24.09.2007. His PERs for the year 2008 to 2018 are not available.
1:		·
,		The Board recommended to fletor his promotion
6.	Mr. Dilbar Khan	His date of birth is 14,12.1962. He joined government service on 07.09.1970 and was promoted to BS-17 on 21,04.2007. His PERs for the year 2008 to 2018 are not available.
		The Board recommended to defer his promotion.
7.	Mr. Firdos Khan	His date of birth is 03.01.1980. He joined government service on 26.02.2003 in BS-17. His PERs for the year 2008 to 2018 are not available.
		The Board recommended to defer his promotion.
.8.	Mr. Iftikhar Hussain Attubed	His date of birth is 01.05.1981. He joined government service on 31.05.2008 in BS-17. The Board in its meeting held on 17.09.2018 and 26.12.2018 recommended to defer his promotion as his dossier was incomplete. Position is still the same.
1	Section Afficer (USB)	
	of Khyber Pektitunkhya ablishmad Dayartmant	The Board recommended to defer his promotion.
9.	Mr. Shabir Ahmad	His date of birth is 22.07.1971. He joined government service on 26.02.2008 in BS-17. The Board in its meeting held on 17.09.2018 and 26.12.2018 recommended to defer his promotion as his dossier was incomplete. Position is still the
		same.
		The Board recommended to defer his promotion.
10	Mr. Irfan Ullah	His date of birth is 16.03.1975. He joined government service on 21.10.2008 in BS-17. The Board in its meeting held on 17.09.2018 and 26.12.2018 recommended to defer his
		promotion as his dossier was incomplete. Position is still the

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ſ			same.
.	-,		
			The Board recommended to defer his promotion.
	11.	Mr. Ihsan Ullah	His date of birth is 01.02.1979. He joined government service on
	, ,		19.04.2008 in BS-17. The Board in its meeting held on
	. :	,	17.08.2010 and Ed. 12.2010 Tocomment
			promotion as his dossier was incomplete. Position is still the same,
, .			Same,
,			,
ا د در	· .		The Board recommended to defer his promotion.
``	12.	Mr. Ashfaq ur	His date of birth is 30.03 1981. He joined government service on
:		Rehman	26.02.2003 in BS-17. His PERs for the year 2008 to 2018 are
		· ·	not available.
		•	
•			The Board recommended to defer his promotion.
• :			,
•	13.	Mr. Fahim Jan	His date of birth is 20.01.1982. He joined government service on 26.02.2008 in BS-17. His PERs for the year 2008 to 2018 are
			not available.
:		Allested	
Č.	-Secti	on Officely (03%) Knyber 25 Sheunkhwa	
90	stable	shment Dopenment	The Board recommended to defer his promotion.
	14.	Mr. Abid Ullah	His date of birth is 14.09 1980. He joined government service on
	,		26.02,200B in BS-17. His PERs for the year 2011 to 2018 are not available.
٠.			not available.
			The Board recommended to defer his promotion.
	<u> </u>	<u> </u>	
•	15;	Mr. Abdur Rehman	His date of birth is 16.03.1989. He joined government service on 26.02.2008 in BS-17. His PERs for the year 2011 to 2018 are
	<u>.</u>		not available.
		'	
] [The Board recommended to defer his promotion.
:	16.	Mr. Bashir Ul Haq	His date of birth is 14.04.1966. He joined government service on
			17.07.2008 in BS-17. The Board in its meeting held on
			17.09.2018 and 26.12.2018 recommended to defer his promotion as his dossier was incomplete. Position is still the
			same.
4			
3		the second second	

Section Officer (Schools)
Education Department
City Section Kills ber Pakhtunkhwa

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PSB meeting held on 17.05.2019

•		PSB meeting held on 17.03.2012
		The Board recommended to defer his promotion.
17.	Mr. Muhammad Ayub	His date of birth is 27.03.1972. He joined government service on
		26.02.2003 In BS=17. His PERs for the year 2010 to 2018 are
		not available.
		The Board recommended to defer his promotion.
18.	Mr. Usman Shah	His date of birth is 13.01,1973. He joined government service on 31.05,2008 in BS-17. The Board in its meeting held on 17.09,2018 and 26.12.2018 recommended to defer his promotion as his dossier was incomplete. Position is still the same.
	•	•
·		The Board recommended to defer his promotion.
19.	Mr. Arshad Iqbal	His date of birth is 01.04.1981. He joined government service on 26.02.2008 in BS-17. The Board in its meeting held on 17.09.2018 and 26.12.2018 recommended to defer his promotion as his dossier was incomplete. Position is still the same.
		The Board recommended to defer his promotion.
20.	Allerian (18 B)	His date of birth is 01.03.1980. He joined government service on 29.09.2008 in BS-17. The Board in its meeting held on 17.09.2018 and 26.12.2018 recommended to defer his promotion as his dossier was incomplete. Position is still the same.
\$pvl	t of Khyber Pakhtunkhwa laulishment Ospartment	The Board recommended to defer his promotion.
	Mr. Mujib ur Rehman	His date of birth is 14.04.1978. He joined government service on 31.05.2008 in BS-17. His PERs for the year 2011 to 2018 are not available.
		The Board recommended to defer his promotion.
1		·
1 27	2. Mr. Naqib Ahmad	His date of birth is 01.06.1977. He joined government service of 17.07,2008 in BS-17. The Board in tits meeting held of 17.09.2018 and 26.12.2018 recommended to defer his promotion as his dossier was incomplete. Position is still the same.
		The Board recommended to defer his promotion.

Section Officer (Schools) L. Berlinger (Schools) L. Control of the Control of the

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23.	Mr. Hazrat Ali Mr. Abdul Qayyum	His date of birth is 01,01,1980. He joined government service on 31,05,2008 in BS-17. He is on study leave. The Board recommended to defer his promotion.
24.	Mr. Abdul Qayyum	The Board recommended to defer his promotion.
24.	Mr. Abdul Qayyum	The Board recommended to defer his promotion.
24.	Mr. Abdul Qayyum	The Board recommended to defer, his promotion.
24.	Mr. Abdul Qayyum	
		His date of birth is 20,08,1959. He joined government service on 01,01,1970 and was promoted to BS-17 on 20,01,2009. His PERs for the year 2010 to 2018 are not available.
		The Board recommended to defer his promotion.
°25.	Mr. Rehman Ali	His date of birth is 26.04.1960. He joined government service on 08.02.1983 and was promoted to BS-17 on 01.04.2009. His
		PERs for the year 2010 to 2018 are not available.
		The Board recommended to defer his promotion.
26.	Mr. Tahir Ali	His date of birth is 15.05.1971. He joined government service on 03.12.1990 and was promoted to BS-17 on 06.01.2011. His PERs for the year 2011 to 2018 are not available.
		FEI(S for the year 2011 to 2010 did not extend
		The Board recommended to defer his promotion.
27.	Iftikhar	His date of birth is 01.01.1978. He joined government service on 25.02.2011 in BS-17. His PERs for the year 2010 to 2018 are not available.
	Section Office (PSB) A: bi.Khyber Edithinkhwa	
Gov	n: br.Khyber Edithtunkhwa stelplishment Department	The Board recommended to defer his promotion.
28		His date of birth is 09.04.1981. He joined government service on 23.12.2010 in BS-17. The Board in its meeting held on 17.09.2013 and 26.12.2018 recommended to defer his promotion as his dossier was incomplete. Position is still the same
	· · · · · · · · · · · · · · · · · · ·	The Board recommended to defer his promotion.
2	9. Mr. Darwaish Khan	His date of birth is 15.02.1982. He joined government service of 25.02.2011 in BS-17. The Board in its meeting held of 17.09.2018 and 26.12.2018 recommended to defer his promotion as his dossier was incomplete. Position is still the
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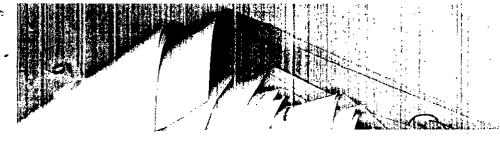
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A.A.		J. J	PSH meeting held on 17.05, 2019
	•		The Board recommended to defer his promotion.
	30.	Mr. Gulzar Khan	His date of birth is 06.09.1983. He joined government service on 16.08,2010 in BS-17. The Board in its meeting held on 17.09.2018 and 26.12.2018 recommended to defer his promotion as his dossier was incomplete. Position is still the same.
			The Board recommended to defer his promotion.
	31.	Mr. Tariq Rahim	His date of birth is 30:03.1983. He joined government service on 25.02.2011 in BS-17. The Board in its meeting held on 17.09,2018 and 26.12.2018 recommended to defer his promotion as his dossier was incomplete. Position is still the same.
: Y	32.	Mr. Muhammad Amin	The Board recommended to defer his promotion. His date of birth is 05.10.1978, He joined government service on 25.02.2011 in BS-17. The Board in its meeting held on 17.09.2018 and 26.12.2018 recommended to defer his promotion as his dossier was incomplete. Position is still the
	Bowl	Section Affect (1878)	The Board recommended to defer his promotion.
	33.	Mr. Midrar Ullah	His date of birth is 20.04.1979. He joined government service on 16.08.2010 in BS-17. His PERs for the year 2011 to 2018 are not available.
			The Board recommended to defer his promotion.
	34	Mr. Ali Ahmad	His date of birth is 01.01.1983. He joined government service on 12.01.2010 in BS-17. The Board in its meeting held on 17.09.2018 and 26.12.2018 recommended to defer his promotion as his dossier was incomplete. Position is still the same.
			The Board recommended to defer his promotion.
;	35	6. Mr. Muhammad	His date of birth is 04.01,1979. He joined government service on
		Sec.	Star (Seleccie) Star (Seleccie) The Mark (Seleccie) The Mark (Seleccie)

	Nadgem	24,02,2011 in BS-17. The Board in its meeting held on 17,03,2019 and 26,12,2018 recommended to defer his promotion as his dessier was incomplete. Position is still the same.
	nag ang andread sam se sensimen is no sensimen at an order of the sensimen at	The Board recommended to append promotion. His date of birth is 01,12,1980. He joined government service on
36.	Mr. Muhammad Bilal	16.08.2010 in BS-17: The Board in its meeting held on 17.09.2018 and 26.12.2018 recommended to defer his promotion as his dessier was incomplete. Position is still the same.
1		The Board recommended to gletter his promotion.
37.	Mr. Muhammad Shakeel	His date of birth is 28:02.1982. He joined government service on 16.08,2010 in BS-17. The Board in its meeting held on 17.09.2018 and 26.12.2018 recommended to defer his promotion as his dossier was incomplete. Position is still the samo.
		The Board recommended to defet his promotion.
38.	Mr. Muhammad Asif	His date of birth is 04.04.1983. He joined government service on 16.08.2010 in BS-17. The Board in its meeting held on 17.09.2018 and 26.12.2018 recommended to defer his promotion as his dossier was incomplete. Position is still the same.
		The Board recommended to defer his promotion.
8st 39.	Mr. Mashkoor Rehman Afridi	His date of birth is 09.06.1976. He joined government service on 25.02.2011 in BS-17. The Board in its meeting held on 17.09.2018 and 26.12.2018 recommended to defer his
	,	promotion as his dossier was incomplete. Position is still the same.
		The Board recommended to defer his promotion.
40.	Mr. Abdul Samad	His date of birth is 28.10.1981. He joined government service on 16.08.2010 in BS-17. The Board in its mouting held on 17.09.2018 and 26.12.2018 recommended to defer his
		promotion as his dossier was incomplete. Position is still the same.
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i.		<u>PSII meeting held on 17,05,2019</u>
434 (11. m.)		
		The Board recommended the officer for promotion to BS-18 on regular basis. He will be on probation for a period of one year.
99.	Mr. Sikandar Hayat	Not considered as he left the Department.
100.	Syed Hayat Ali Shah	His date of birth is 02.04,1976. He joined government service on
		12.01.2010 in BS-17. No enquiry is pending against him. His service record upto 2018 is generally good.
,		The Board recommended the officer for promotion to BS-18 on regular basis. He will be on probation for a period of one year.
101.	Mr. Sher Dil	His date of birth is 11.09.1976. He joined government service on 16.08.2010 in BS-17. No enquiry is pending against him. His service record upto 2018 is generally good.
		The Board recommended the officer for promotion to BS-18 on regular basis. He will be on probation for a period of one year
102	Mr. Umar Khilab	His date of birth is 18.05.1977. He joined government service on 01.03.2000 and was, appointed to BS-17 on 12.01.2010. No enquiry is pending against him. His service record upto 2018 is generally good.
•		
		The Board recommended the officer for promotion to BS-18 on regular basis. He will be on probation for a period of one year
103.	Mr. Latif ur Rehman	His date of birth is 30 11.1977. He joined government service on 27.12.1999 and was appointed to 185-17 on 23 12.2010. No enquiry is pending against him. His service record upto 2018 is generally good.
	// // (USA)	
· .	South of King St.	The Board recommended the officer for promotion to BS-18 on regular basis. He will be on probation for a period of one year
104.	Mr. Azhar Hussain	His date of birth is 22.03.1978. He joined government service or 12.04.1998 and was appointed to BS-17 on 10.01.2011. No
		enquiry is pending against him. His service record upto 2013 is generally good.
		The Board recommended the officer for promotion to BS-18 on
		12 Mestade

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regular basis. He will be on probation for a period of one year.

105. Mr. Hashmat Ali

His date of birth is 12.04.1978. He joined government service on 24/02.2011 in BS-17. His PERs for the year 2011 to 2018 are not available.

The Board recommended to defer his promotion.

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regular basis. He will be on probation for a period of one year.

405 Mr. Harting

His date of birth is 12.04.1978. He joined government service on 24:02.2011 in BS-17. His PERs for the year 2011 to 2018 are not available.

The Board recommended to defer his promotion.

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