

**BEFORE THE HO'NBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR.**

Amended Service Appeal in Appeal No.1540 /2023.

PERVEZ KAMAL

VERSUS

SECRETARY EDUCATION, ETC.

INDEX

SERIAL	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGES
1.	Grounds of Appeal		1-4
2.	Affidavit		5
3.	Application for Suspension of Impugned Order		6
4.	Affidavit		7
5.	Addresses of Parties		8
6.	Copy of Promotion Notification	"A"	9-14
7.	Copy of the Promotion Order	"A-1"	15-16
8.	Copies of the Pay Slips & Impugned Withdrawal Notification of 15/03/2023.	"B & C"	17-25
9.	Copy of the Impugned Adjustment Order Departmental Appeal of 21/03/2023.	"D & E"	26-28
10.	Copy of the Impugned Withdrawal Office Order of 24/03/2023.	"F"	29
11.	Other Documents	"G"	30-34
12.	Wakalatnama		35

Dated: September 19th, 2023

APPELLANT,


Javed Iqbal Gulbela
Advocate, Supreme Court.

Through


Saghir Iqbal Gulbela
Advocate, High Court.

**BEFORE THE HO'NBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR.**

Amended Service in Appeal No.1540 /2023

Mr. Pervez Kamal S/o Abdur Rahim Khan R/o Nar Superlai, P/O Serai Norang, Nar Kashmir Musa khel, Tehsil Serai Norang, District Lakki Marwat.

.....**APPELLANT**

VERSUS

1. Secretary Elementary and Secondary Education, Khyber Pakhtunkhwa, 2nd & 3rd Floor, Block- A, Near MPA Hostel, Civil Secretariat, Khyber Pakhtunkhwa, Peshawar.

2. Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa, Hashtnagri Chowk, Near Fort Bala Hisar Peshawar.

3. Director Elementary and Secondary Education Khyber Pakhtunkhwa, Hashtnagri Chowk, Near Fort Bala Hisar Peshawar.

4. District Education Officer (Male), Khyber Pakhtunkhwa, Lakki Marwat.

.....**RESPONDENTS**

AMENDED SERVICE APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL ACT-1974, AGAINST THE IMPUGNED ORDER DATED 24/03/2023 OF THE OFFICE OF THE DISTRICT EDUCATION OFFICER, LAKKI MARWAT, WHEREBY THE PROMOTION ORDER OF THE APPELLANT HAS BEEN ILLEGALLY WITHDRAWN IN A CLASSICAL CURSORY AND WHIMSICAL MANNER.

Respectfully Sheweth,

1. That after going through mandatorily required criteria laid down for selection and appointment, the Appellant got appointed as Primary School Teacher (BPS-12) back in the year on 16/10/2006.

2. That thereafter serving for long years the Appellant's career is clean and clear of any sort of soot or sootage, nor there has ever been any complaint whatsoever even moved against the Appellant.
3. That during the course of Service Appeal Appeal, the Appellant was properly and validly promoted to the post of SST (BPS-16) vide Notification No. 3997-400 of 01/12/2022 of the office of Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar. **(Copy of Notification & Promotion Order is annexed as ANNEXURE A & A-1)**
4. That after being promoted as SST (BPS-16) the Appellant there and then promptly submitted the "Arrival report" and joined the duty as SST (BPS-16).
5. That the Appellant started performing his duties as SST (BPS-16) and so got his salary package of BPS-16. **(Copy of Pay Slips are annexed as ANNEXURE - B)**
6. That while the Appellant was performing his duties with full devotion, that out of the blue and without of any rim or reason, the Promotion Order of the Appellant was illegally withdrawn in the light of the Notification No. 9256-60/File No,1/Promotion of SST (BPS16)/2022, Dated: 15/03/2023 vide the Impugned Office Order No. 2516-21 Dated: 24/03/2023 **(Copy of the Impugned Notification Dated: 15/03/2023 & Impugned Office Order 24/03/2023 is annexed as ANNEXURE - C & D)**
7. That the Appellant preferred the Departmental Appeal against the Impugned Notification , but even after lapse of the statutory time period, nothing came out of the same. Hence the instant Service Appeal before this August forum to seek redressal of the grievances faced by the poor Appellant. **(Copy of the Departmental Appeal is annexed here as ANNEXURE - F)**
8. That feeling aggrieved, the Appellant preferred the instant Service Appeal for setting aside the impugned withdrawal of Promotion Order

and restoration of promotion of the Appellant with all back benefits upon the following grounds, inter-alia:

GROUND:

- A.** That the impugned order of withdrawal of promotion is wrong, illegal and void and not sustainable at all.

- B.** That the impugned order is the result of colorful exercise of the discretionary power vested in the Respondents and not tenable at all.

- C.** That the impugned order has been passed at the back of the Appellant and thus the Appellant has been condemned unheard.

- D.** That under the law where an order is passed and it has taken effect and certain rights are created in favor of the effected Civil Servant, thus such orders cannot be withdrawn, altered or rescinded at all.

- E.** That ever otherwise the Appellant has validly and properly been promoted in a fair and transparent manner and thereafter the Appellant has rendered Service Appeal Appeals and has received salaries of the promoted grade, then without any blemish on part of the Appellant the same cannot be withdrawn.

- F.** That no prior notice has ever been issued to the Appellant before withdrawn of the promotion order.

- G.** That from every angle the withdrawal of the promotion order is wrong, illegal and void.

- H.** That under the mandate of Article 4 of the Constitution, no one should be treated otherwise than in an accordance with law, wherein Article 25 postulates that alike are to be treated alike, but here a different discriminating approach has been used to treat the Appellant.

- I.** That discrimination in any form is highly abominable and bete-noire and is always checked down in derisorous manner by the Superior Courts of the

land. Reason behind checking it down and chucking it away is to ensure equality and equal treatment of its citizens and to remove any sense of discrimination.

J. That the law and law courts of the land have always preferred and encouraged that rules and policies are to be followed and have always discouraged, deplored, and depreciated any variation from the rules or policies.

K. That any other ground not raised here may graciously be allowed to be raised at the time of arguments.

It is therefore, most humbly prayed that on acceptance of the instant Service Appeal, the Impugned Notification No. 9256-60/File No.1/Promotion of SST (BPS16)/2022, Dated: 15/03/2023 and the Impugned Office Order No. 2516-21 Dated: 24/03/2023 may very graciously be declared as illegal, void and be struck down and canceled and by doing so the Respondents be directed to restored the Appellant on the post of SST (BPS-16) with all back benefits.

Any other relief not specifically asked for, may also graciously be extended in favor of the Appellant, given the circumstances of the case.

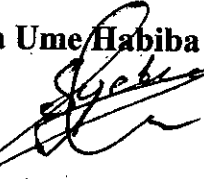
Dated: September 19th, 2023

APPELLANT,


Mr. Javed Iqbal Gulbela
Advocate, Supreme Court.

Through


Mr. Saghir Iqbal Gulbela
Advocate, High Court.


Ms. Syeda Ume/Habiba
Advocate.


Mr. Arif Mohmand
Advocate.

NOTE:-

No such like Service Appeal has earlier been filed by me before this Hon'ble Tribunal, prior to this one, & the case pertains to be heard by the DB of this August Tribunal.


Advocates

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR**

Ammended Appeal No. _____/2023

In

S.Appeal No.1540/2023

Parvez Kamal

Versus

Govt of KPK & Others

AFFIDAVIT

I, Parvez Kamal S/o Abdul Rahim Khan R/o Narsparlai, P/o Serai Norang, Nar Kashmir, Musa Khel, Tehsil Serai Norang District Lacky Marwat, do hereby solemnly affirm & declare on oath that all contents of the instant Service Appeal are true & correct to the best of my knowledge and belief & nothing has been concealed from this Hon'ble Tribunal.

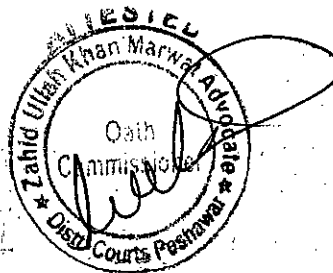


DEPONENT

CNIC# 11201-0324641-9
Cell# 0305-9138442

Identified By:

Javed Iqbal Gulbela
Advocate, Supreme Court,
of Pakistan.



**BEFORE THE HO'NBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR.**

Amended Service Appeal in Appeal No.1540 /2023

PERVEZ KAMAL

VERSUS

SECRETARY EDUCATION, ETC.

APPLICATION FOR THE TEMPORARY INJUNCTION

Respectfully Sheweth,

1. That the Petitioner is filing the accompanying Service Appeal, the contents of which may graciously be considered as integral part and parcel of the instant petition.

2. That the prima facie case exists in the favour of the Petitioner.

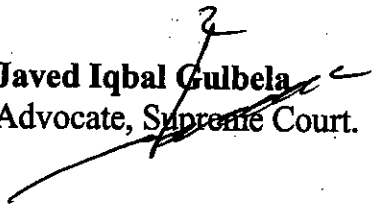
3. That if the operation of the Impugned Notification and Office Order as mentioned above, is not suspended the Petitioner will suffer irreparable loss.

4. That in the given circumstances, the suspension of the operation of the Impugned Notification & Office Order are indispensable.

It is therefore most humbly prayed that on acceptance of the instant application, the Respondents be directed to keep one post of SST (BPS-16) vacant, till the final disposal of the instant service appeal.

Dated: September 19th, 2023

APPELLANT,


Javed Iqbal Gulbela
Advocate, Supreme Court.

Through


Saghir Iqbal Gulbela
Advocate, High Court.

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR**

S.Appeal No.1540/2023

Parvez Kamal

Versus

Govt of KPK & Others

AFFIDAVIT

I, Parvez Kamal S/o Abdul Rahim Khan R/o Narsparlai, P/o Serai Norang, Nar Kashmir, Musa Khel, Tehsil Serai Norang District Lacky Marwat, do hereby solemnly affirm & declare on oath that all contents of the instant application are true & correct to the best of my knowledge and belief & nothing has been concealed from this Hon'ble Tribunal.



DEPONENT

CNIC# 11201-0324641-9
Cell# 0305-9138442

Identified By

Javed Iqbal Gulbela
Advocate, Supreme Court,
of Pakistan.



**BEFORE THE HO'NBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR.**

Amended Service Appeal in Appeal No.1540 /2023

PERVEZ KAMAL

VERSUS

SECRETARY EDUCATION, ETC.

MEMORANDUM OF ADDRESSES

ADDRESS OF THE APPELLANT:

*Pervez Kamal S/o Abdur Rahim Khan R/o Nar Superlai, P/O Serai Norang,
Nar Kashmir Musa khel, Tehsil Serai Norang, District Lakki Marwat.*

ADDRESSES OF THE RESPONDENTS:

- 1. Secretary Elementary and Secondary Education, Khyber Pakhtunkhwa,
2nd & 3rd Floor, Block- A, Near MPA Hostel, Civil Secretariat, Khyber
Pakhtunkhwa, Peshawar.*
- 2. Directorate of Elementary and Secondary Education Khyber
Pakhtunkhwa, Hashtnagri Chowk, Near Fort Bala Hisar Peshawar.*
- 3. Director Elementary and Secondary Education Khyber Pakhtunkhwa,
Hashtnagri Chowk, Near Fort Bala Hisar Peshawar.*
- 4. District Education Officer, Khyber Pakhtunkhwa, Lakki Marwat.*

Dated: September 19th, 2023

APPELLANT,

Javed Iqbal Gulbela
Advocate, Supreme Court.

Through

Saghir Iqbal Gulbela
Advocate, High Court.

② Promotion Order ⑨

Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

Ann - A

Notification

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.SO(B&A)/1-18/E&SE/2012 dated 11.7.2012 and Finance Department Endorsement No.SO(FR)/FD/ 10-22(E)2010 dated 16.7.2012, the following CT/SCT, DM/SDM, AT/SAT, TT/SIT, Qari/S.Qari and PSHT/SPST/PST (Male) are promoted to the posts of SST (General), SST (Bio/Chem) and SST (Maths/Phy) in BPS-16 (Rs.28070-2260-95870) respectively, plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect.

A. SST (General)

ITEM NO.1:- PROMOTION OF CT/SCT TO SST (G) BPS-16 ON REGULAR BASIS

The case of promotion of CT/SCT to the post of SST (G) BPS-16 was considered and the DPC recommended as under:-

Total No. of Vacant Post of SST(G)	20
25% Initial Recruitment Quota	5
75% by Promotion Quota	15
40% CT/SCT Promotion quota to SST(G)	8
Proposed for Promotion to SST(G)	08

S. No	Sen #	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular CT	Academic & Professional Qualification	Remarks
1.	1	Mir Kabul Khan	GHSS Sarai Naurang	01-10-1963	20-10-1982	BA, DAE, B.Ed	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
2.	36	Mir Abbas Khan	GHS Zangi Khel	08-08-1963	05-04-1999	MA, CT, B.Ed	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
3.	37	Abdul Qayum Khan	GHSS Sarai Naurang	15-12-1970	05-04-1999	MA, CT, B.Ed	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
4.	38	Ikram Ullah	GHS Dalo Khel	10-01-1969	23-12-1999	MA, CT, B.Ed	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
5.	40	Bashir Ahmad	GHSS Sarai Naurang	08-03-1969	23-12-1999	MA, B.Ed	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
6.	42	Habib ur Rehman	GHSS Tajazai	28-03-1970	23-12-1999	MA, B.Ed	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

7.	43	Javed Iqbal	GHS Isak Khel	01-08-1975	23-12-1999	MA, B.Ed	Services are placed at the disposal of DEO (M) Lakkī Marwat for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
8.	45	Asmat Ullah Khan	GHSS Wanda Amir	12-04-1967	23-12-1999	MA, Gen CT, B.Ed	Services are placed at the disposal of DEO (M) Lakkī Marwat for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

ITEM NO.2: -PROMOTION OF DM/SDM TO SST (G) BPS-16 ON REGULAR BASIS

The case of promotion of DM/SDM to the post of SST (G) BPS-16 was considered and the DPC recommended as under:-

Total No. of Vacant Post of SST(G)	20
25% Initial Recruitment Quota	5
75% by Promotion Quota	15
4% DM/SDM Promotion quota to SST(G)	0.8=1
Proposed DM/SDM for Promotion to SST(G)	01

S.No	Sen #	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular DM	Academic & Professional Qualification	Remarks
1.	9	Yousaf Khan	GHS Nar Muzaffar Khan	10-02-1966	17-12-1989	MA, B.Ed	Services are placed at the disposal of DEO (M) Lakkī Marwat for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

ITEM NO.3:- PROMOTION OF AT/SAT TO SST (G) BPS-16 ON REGULAR BASIS

The case of promotion of AT/SAT to the post of SST (G) BPS-16 was considered and the DPC recommended as under:-

Total No. of Vacant Post of SST(G)	20
25% Initial Recruitment Quota	5
75% by Promotion Quota	15
4% AT/SAT Promotion quota to SST(G)	0.8=1
Proposed AT/SAT for Promotion to SST(G)	01

S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular AT	Academic & Professional Qualification	Remarks
1.	18	Hidayat Ur Rehman	GSBAKHSS Naurang	12-02-1970	05-04-1999	MA, B. Ed.	Services are placed at the disposal of DEO (M) Lakkī Marwat for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

ITEM NO.4:- PROMOTION OF TT/STT TO SST (G) BPS-16 ON REGULAR BASIS

The case of promotion of TT/STT to the post of SST (G) BPS-16 was considered and the DPC recommended as under:-

Total No. of Vacant Post of SST(G)	20
25% Initial Recruitment Quota	5
75% by Promotion Quota	15
4% TT/STT Promotion quota to SST(G)	0.8=1
Proposed TT/STT for Promotion to SST(G)	01

11

S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular TT	Academic & Professional Qualification	Remarks
1.	11	Bismillah Jan	GHS Gandhi Khan Khel	11-03-1971	16-09-2005	MA, B.Ed	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

ITEM NO.6:- PROMOTION OF PST/SPST/PSHT TO SST (G) BPS-16 ON REGULAR BASIS

The case of promotion of PST/PSHT/SPST to the post of SST (G) BPS-16 was considered and the DPC recommended as under:-

Total No. of Vacant Post of SST(G)	20
25% Initial Recruitment Quota	5
75% by Promotion Quota	15
20% PST/SPST/PSHT to SST(G)	4
Proposed PST/SPST/PSHT for Promotion to SST(G)	04

S.No	Sen #	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular PST	Academic & Professional Qualification	Remarks
1.	64	Insaf Ullah	GPS MUHAMMAD NAWAZ GHAZNI KHEL	03-02-1970	02-11-2013	MA/ PTC, CT, B. Ed	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
2.	113	Muhammad Ajmal Khan	GPS AMIN JABU KHEL	01-07-1971	02-11-2013	BA/PTC, CT, B,Ed	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
3.	114	Muhammad Iqbal Khan	GPS Haqdad Abad No.1 Lakki	08-04-1972	11-02-2013	MA/PTC, CT, B.Ed	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
4.	115	Kiramat Ullah Khan	GPS Kotka Shah Slaim	05-05-1972	11-02-2013	BA/PTC, CT, B,Ed	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

B. SST (Bio/Chem)

ITEM NO.1:- PROMOTION OF CT/SCT TO SST (Bio/Chem) BPS-16 ON REGULAR BASIS

The case of promotion of CT SCT to the post of SST (Bio/Chem) BPS-16 was considered and the DPC recommended as under:-

Total No. of Vacant Post of SST(Bio/Chem)	14
25% Initial Recruitment Quota	3.5=3
75% by Promotion Quota	10.5=11
40% CT/SCT Promotion quota to SST(Bio/Chem)	5.6=5
Proposed for Promotion to SST(Bio/Chem)	5

JAVED IQBAL GULBELA
 Advocate
 Supreme Court of Pakistan
 (ASC # 5317)

S.No	Sen #	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular CT	Academic & Professional Qualification	Remarks
1.	112	Dilawar Shah (SCT)	GSBAKHSS Naurang	10-04-1973	11-05-2012	MSc (H) Agriculture, B.Ed	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (Bio-Chem) BPS-16 on regular basis with immediate effect.
2.	154	Akbar jan Khan (CT)	GHS Mela Mandra Khel	10-11-1985	27-05-2014	B.Sc B/C B/C, B.Ed	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (Bio-Chem) BPS-16 on regular basis with immediate effect.
3.	157	Muhammad Daud Khan (CT)	GMS Multan Manjiwala	06-02-1984	27-05-2014	MSc/CT, B.Ed B/C	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (Bio-Chem) BPS-16 on regular basis with immediate effect.

ITEM NO.5:- PROMOTION OF PST/SPST/PSHT TO SST (Bio/Chem) BPS-16 ON REGULAR BASIS

The case of promotion of PST/PSHT/SPST to the post of SST (Bio/Chem) BPS-16 was considered and the DPC recommended as under:-

Total No. of Vacant Post of SST(Bio/Chem)	14
25% Initial Recruitment Quota	3.5=3
75% by Promotion Quota	10.5=11
20% PST/SPST/PSHT to SST(Bio/Chem)	2.8=3
Proposed PST/SPST/PSHT for Promotion to SST(Bio/Chem)	03

S.No	Sen #	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular PSHT	Academic & Professional Qualification	Remarks
1	429	Muhammad Zaman	GPS Kotka Mahmood No.2	20-03-1981	23-04-2019	MSc, BSC (B/C), B.ED	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (Bio-Chem) BPS-16 on regular basis with immediate effect.
2	431	Pervaiz Kamal	GPS Nar Pur Dil Begu Khel	01-01-1982	23-04-2019	B.SC(B/C), B.Ed	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (Bio-Chem) BPS-16 on regular basis with immediate effect.

13

ITEM NO.3:- PROMOTION OF AT/SAT TO SST (Maths/Phy) BPS-16 ON REGULAR BASIS

The case of promotion of AT/SAT to the post of SST (Maths/Phy) BPS-16 was considered and the DPC recommended as under:-

Total No. of Vacant Post of SST(Maths/Phy)	23
25% Initial Recruitment Quota	5.75=6
75% by Promotion Quota	17.25=17
4% AT/SAT Promotion quota to SST(Maths/Phy)	0.92=1
Proposed AT/SAT for Promotion to SST(Maths/Phy)	01

S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular AT	Academic & Professional Qualification	Remarks
1.	24	Mishbah ullah Khan (AT)	GMS wanda amir lakki	01/01/1985	05/03/2016	MA B.Sc (Maths/Phy) B.Ed	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (Maths/Phy) BPS-16 on regular basis with immediate effect.

ITEM NO.5:- PROMOTION OF Qari/S Qari TO SST (Maths/Phy) BPS-16 ON REGULAR BASIS

The case of promotion of Qari/S Qari to the post of SST (Maths/Phy) BPS-16 was considered and the DPC recommended as under:-

Total No. of Vacant Post of SST(Maths/Phy)	23
25% Initial Recruitment Quota	5.75=6
75% by Promotion Quota	17.25=17
3% Qari/Sr.Qari Promotion quota to SST(Maths/Phy)	0.69=1
Proposed Qari/Sr.Qari for Promotion to SST(Maths/Phy)	01

S.No	Sen #	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular Qari	Academic & Professional Qualification	Remarks
1.	21	Rafi Ullah Khan	GSMGKCM HS NO.1 LAKKI	22-03-1986	28-05-2019	MA, BSc (M/P) B.Ed.	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (Maths/Phy) BPS-16 on regular basis with immediate effect.

ITEM NO.6:- PROMOTION OF PST/SPST/PSHT TO SST (Maths/Phy) BPS-16 ON REGULAR BASIS

The case of promotion of PST/PSHT/SPST to the post of SST (Maths/Phy) BPS-16 was considered and the DPC recommended as under:-

Total No. of Vacant Post of SST(Maths/Phy)	23
25% Initial Recruitment Quota	5.75=6
75% by Promotion Quota	17.25=17
20% PST/SPST/PSHT to SST(Maths/Phy)	4.6=4
Proposed PST/SPST/PSHT for Promotion to SST(Maths/Phy)	04

S.No	Sen #	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular PSHT	Academic & Professional Qualification	Remarks
1.	358	Noor Badshah	GPS Jalu Khel	05-12-1972	14-06-2017	M.SC ,BSc (M/P),B.ED	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (Maths/Phy) BPS-16 on regular basis with immediate effect.

JAVED ALI GULBELA
Advocate
Supreme Court of Pakistan
(WSC # 5317)

360	Shah Baz Khan	GPS Bakhmal Ahmad Zai	26-01-1973	14-06-2017	M.SC (M/P), B.ED	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (Maths/Phy) BPS-16 on regular basis with immediate effect.
-----	---------------	-----------------------	------------	------------	------------------	---

14

Terms and Conditions:-

1. They shall be on probation for the period as specified in Rules (15) substituted vide - No.SO(Policies)/E&AD/1-3/2017 Dated, 07-12-2017 in Appointment, Promotion and Transfer Rules, 1989.
2. They will be governed by such rules and- regulations as may be issued from time to time by the Govt.
3. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their Inter-Se- seniority on lower post will remain intact as per Rules (17)(4) of Appointment, Promotion and Transfer Rules, 1989.
6. No TA/DA is allowed for joining the duty.
7. They will give an undertaking to be recorded in their service books to the effect that if any over payment is made to them in light this order, will be recovered and if they are wrongly promoted, they will be reversed.
8. Before handing over charge, their documents may be checked. If they have not the required relevant qualification as per rules, they may not be handed over the charge of the post.

(Hafiz Dr. Muhammad Ibrahim)
Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

3997-4001

Endst: No _____ / File No.1/Promotion of SST (BPS-16)/2022 Dated Peshawar the 01/12/2022
Copy forwarded for information and necessary action to the:-

1. District Education Officer (M) Lakki Marwat.
2. District Accounts Officer Lakki Marwat.
3. Officials Concerned.
4. Principal/HM Concerned.
5. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
6. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
7. M/File.

(Signature)
01/12/2022
Assistant Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

**OFFICE OF THE DISTRICT EDUCATION OFFICER
MALE LAKKI MARWAT**

15

☎ 32291, smail@sybau.com, www.facebook.com/dco.male.lakki, www.dco.male.lakki

Am - A/12

OFFICE ORDER:

Consequent upon the recommendation of the Departmental Promotion Committee & in pursuance of the Govt. of Khyber Pakhtunkhwa Elementary & Secondary Education Notification No SO(B&AO)/1-18/E&SE/2012 dated 11-07-2012 & Finance department Endorsement No SO (FR)/FD /10-22(E) 2010 dated 16-07-2012 & Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar Notification bearing No.3997-4001/file No.1/Promotion of SST (BPS-16)/2022 dated 01/12/2022, the following SCT/CT,SDM/DM, AT/SAT,TT/STT, Qari/S.Qari and PSHT/SPST/PST (Male) are hereby promoted to the post of SST (General), SST (Bio-Chem) and SST (Maths/Phy) respectively in BPS-16 (RS.28070-2260-95870) plus usual allowance as admissible under the rules on regular bases under existing rules/policy of the Provincial Govt, on the terms & condition given below & further adjusted against vacant post in the school mentioned against each with immediate effect, in the best interest of the public service.

SST (General)			
S.No.	Name with present place of posting	Further Place of Posting as SST	Remarks
1.	Mir Kabal Khan SCT GSBKHS Serai Naurang	GSBKHS Serai Naurang	A.V.P
2.	Mir Abbas Khan SCT GHS Zangj Khel	GHS Top Takhti Khel	A.V.P
3.	Abdul Qajum Khan SCT GSBKHS Serai Naurang	GMS Nazar Jan Bhehtaini	A.V.P
4.	Ikram Ullah SCT GHS Daloo Khel	GHS Daloo Khel	A.V.P
5.	Bashir Ahmed SCT GSBKHS Serai Naurang	GHS Kheru Khail Pakka	A.V.P
6.	Habib Ur Rehman SCT GHSS Tajazai	GHSS Tajazai	A.V.P
7.	Javed Iqbal SCT GHS Isak Khel	GHS Shamoni Khattak	A.V.P
8.	Asmat Ullah Khan SCT GHSS Wanda Amir	GHS Wanda Baru	A.V.P
9.	Yousaf Khan SDM GHS Nor Muzaffar Khan	GHS Wanda Aurang Zaib	A.V.P
10.	Hidayat Ur Rehman SAT GSBKHS Serai Naurang	GHS Wanda Samandi	A.V.P
11.	Bismillah Jan STT GHS Gandhi Khan Khel	GHS Abassa Khattak	A.V.P
12.	Insof Ullah PSHT GPS Muhammad Nawaz Ghazni Khel	GMS Nawaz Malla Khel	A.V.P
13.	Muhammad Ajmal Khan PSHT GPS Amin Jabu Khel	GHS Amir Wali	A.V.P
14.	Muhammad Iqbal Khan PSHT GPS No.1 Haggad Abad Lakki	GHS Zar Khan Sur Band	A.V.P
15.	Kiramal Ullah Khan PSHT GPS Kotka Shai Slain	GHS Bragi	A.V.P
SST (Bio/Chem)			
16.	Dilawar Shah SCT GSBKHS Serai Naurang	GHS Abassa Khattak	A.V.P
17.	Akbar Jan CT GHS Mela Mandra Khel	GHSS Abdul Khel	A.V.P
18.	Muhammad Daud Khan CT GMS Multan Manjiwala	GHS Bragi	A.V.P
19.	Muhammad Zaman PSHT GPS Kotka Melmood No.2	GHS Wanda Aurang Zaib	A.V.P
20.	Pervez Kamal PSHT GPS Nar Pur Da Begu Khel	GHS Top Takhti Khel	A.V.P
SST (Maths/Phy)			
21.	Mishah Ullah Khan AT GMS Wanda Amir	GHS Mandan Manjiwala	

JAVED IKBAL GULBELA
Supreme Advocate
(ASC-574)

22.	Rafi Ullah Khan S.Qari GSMGKCMHS No.1 Lakki	GHS Dallo Khel	A.V.P
23.	Noor Badshah PSHT GPS Jalu Khel	GHSS Kot Kashmir	A.V.P
24.	Shah Baz Khan PSHT GPS Bakhmal Ahmad	GHS GPS Baisat Khel	A.V.P
CONSEQUENTIAL TRANSFER			
1	Zahid Iqbal SST (General) GHSS Kheru Khel Pacca	GMS Wanda Amir Alam	AVP

TERMS AND CONDITIONS:

1. They shall be on probation for the period as specified in Rules (15) substituted vide No. SO (Policies)/E&AD/1-3/2017 dated 07/12/2017 in Appointment, Promotion and Transfer Rules, 1989.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period.
In case of misconduct, they shall be proceeded under the rules framed time to time.
4. Charge report should be submitted to all concerned.
5. Their inter-se seniority on lower post will remain intact as per Rules (17) (4) of Appointment, Promotion and Transfer Rules, 1989.
6. No TA/DA is allowed for joining the duty.
7. They will give an under taking to be recorded in their service books/personal files to the effect that if any over payment is made to them in light this order, will be recovered and if they are wrongly promoted, they will be reversed.
8. Before handing over charge, their documents may be checked. If they have not required relevant qualification as per rules, they may not be handed over the charge of the post.

District Education Officer
(Male) Lakki Marwat

Endst No. 8230-37

Dated 12/12/2022

Copy to the:

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar with reference to his office No. & Date cited above.
2. Deputy District Education Officer (Male) Local Office.
3. District Accounts Officer Lakki Marwat.
4. District Monitoring Officer (EMA) Lakki Marwat.
5. SDEO (Male) Concerned.
6. Principals/Head Masters Concerned.
7. AP DEMIS Local Office.
8. Teachers concerned.

M. D. M. S.
District Education Officer
(Male) Lakki Marwat

JAVED IQBAL GULBELA
Advocate
Supreme Court of Pakistan
(ASC # 5317)

JAVED IQBAL GULBELA
Advocate
Supreme Court of Pakistan
(ASC # 5317)

Dist. Govt. KP-Provincial
District Accounts Office Lakki
Monthly Salary Statement (February-2023)

Pay Slips



Personnel Information of Mr PERWEZ KAMAL KHAN d/w/s of ABDUR RAHIM KHAN

Personnel Number: 00348547

CNIC: 1120103246419

NTN:

Date of Birth: 01.01.1982

Entry into Govt. Service: 16.10.2006

Length of Service: 16 Years 04 Months 014 Days

Employment Category: Active Temporary

Designation: SECONDARY SCHOOL TEACHER

80003083-DISTRICT GOVERNMENT KHYBE

DDO Code: LK6098-H.M GHS TOP TAKHTI KHEL

Payroll Section: 001

GPF Section: 001

Cash Center: 15

GPF A/C No: 348547

GPF Interest applied

GPF Balance:

483,194.00 (provisional)

Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2022

Pay Scale Type: Civil BPS: 16

Pay Stage: 11

Wage type		Amount	Wage type		Amount
0001	Basic Pay	52,930.00	1001	House Rent Allowance 45%	4,091.00
1210	Convey Allowance 2005	5,000.00	1300	Medical Allowance	1,500.00
1505	Charge Allowance	40.00	2148	15% Adhoc Relief All-2013	553.00
2199	Adhoc Relief Allow @10%	377.00	2316	Teaching Allowance 2021	3,782.00
2341	Dispr. Red All 15% 2022KP	4,812.00	2347	Adhoc Rel Al 15% 22(PS17)	4,812.00
5002	Adjustment House Rent	896.00	5011	Adj Conveyance Allowance	3,389.00
5150	Adj. Teaching Allow 2021	882.00	5801	Adj Basic Pay	5,768.00

Deductions - General

Wage type		Amount	Wage type		Amount
3016	GPF Subscription	-3,340.00	3501	Benevolent Fund	-1,500.00
3609	Income Tax	-564.00	4004	R. Benefits & Death Comp:	-650.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
------	-------------	------------------	-----------	---------

Deductions - Income Tax

Payable: 7,250.63 Recovered till FEB-2023: 3,184.00 Exempted: 1812.19 Recoverable: 2,254.44

Gross Pay (Rs.): 88,832.00 Deductions: (Rs.): -6,054.00 Net Pay: (Rs.): 82,778.00

Payee Name: PERWEZ KAMAL KHAN

Account Number: 010-1787-8

Bank Details: UNITED BANK LIMITED, 211025 SARAI NAURANG SARAI NAURANG, LAKKI MARWAT

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: LK

Domicile: -

Housing Status: No Official

Temp. Address:

City:

Email: parvezkamal897@gmail.com

JAVED IQBAL GULBELA
Advocate
Supreme Court of Pakistan
(ASC # 5317)

System generated document in accordance with APPM 4.6.12.9(360663/25.02.2023/v3.0)

* All amounts are in Pak Rupees

* Errors & omissions excepted (SERVICES/28.02.2023/20:11:47)

**Dist. Govt. KP-Provincial
District Accounts Office Lakki
Monthly Salary Statement (March-2023)**

18



Personal Information of Mr PERWEZ KAMAL KHAN d/w/s of ABDUR RAHIM KHAN

Personnel Number: 00348547 CNIC: 1120103246419 NTN:
Date of Birth: 01.01.1982 Entry into Govt. Service: 16.10.2006 Length of Service: 16 Years 05 Months 017 Days

Employment Category: Active Temporary

Designation: SECONDARY SCHOOL TEACHER 80003083-DISTRICT GOVERNMENT KHYBE
DDO Code: LK6098-H.M GHS TOP TAKHTI KHEL

Payroll Section: 001 GPF Section: 001 Cash Center: 15
GPF A/C No: 348547 GPF Interest applied GPF Balance: 486,534.00 (provisional)

Vendor Number: -
Pay and Allowances: Pay scale: BPS For - 2022 Pay Scale Type: Civil BPS: 16 Pay Stage: 11

Wage type		Amount	Wage type		Amount
0001	Basic Pay	52,930.00	1001	House Rent Allowance 45%	4,091.00
1210	Convey Allowance 2005	5,000.00	1300	Medical Allowance	1,500.00
1505	Charge Allowance	40.00	2148	15% Adhoc Relief All-2013	553.00
2199	Adhoc Relief Allow @10%	377.00	2316	Teaching Allowance 2021	3,782.00
2341	Dispr. Red All 15% 2022KP	4,812.00	2347	Adhoc Rel Al 15% 22(PS17)	4,812.00

Deductions - General

Wage type		Amount	Wage type		Amount
3016	GPF Subscription	-3,340.00	3501	Benevolent Fund	-1,500.00
3609	Income Tax	-564.00	4004	R. Benefits & Death Comp:	-650.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 7,250.63 Recovered till MAR-2023: 3,748.00 Exempted: 1812.10 Recoverable: 1,690.53

Gross Pay (Rs.): 77,897.00 Deductions: (Rs.): -6,054.00 Net Pay: (Rs.): 71,843.00

Payee Name: PERWEZ KAMAL KHAN
Account Number: 010-1787-8
Bank Details: UNITED BANK LIMITED, 211025 SARAI NAURANG SARAI NAURANG, LAKKI MARWAT

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: LK Domicile: - Housing Status: No Official

Temp. Address:

City: Email: parvezkamal897@gmail.com


JAVED IQBAL GULBELA
Advocate
Supreme Court of Pakistan
(ASC # 6317)

System generated document in accordance with APPM 4.6.12.9(360663/28.03.2023/v3.0)

* All amounts are in Pak Rupees
* Errors & omissions excepted (SERVICES/31.03.2023/13:21:13)

(12) (19)

Dist. Govt. KP-Provincial
District Accounts Office Lakki
Monthly Salary Statement (April-2023)



Personal Information of Mr PERWEZ KAMAL KHAN d/w/s of ABDUR RAHIM KHAN

Personnel Number: 00348547 CNIC: 1120103246419 NTN:
Date of Birth: 01.01.1982 Entry into Govt. Service: 16.10.2006 Length of Service: 16 Years 06 Months 016 Days

Employment Category: Active Temporary

Designation: SECONDARY SCHOOL TEACHER 80003083-DISTRICT GOVERNMENT KHYBE

DDO Code: LK6098-H.M GHS TOP TAKHTI KHEL

Payroll Section: 001

GPF Section: 001

Cash Center: 15

GPF A/C No: 348547

GPF Interest applied

GPF Balance:

489,874.00 (provisional)

Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2022

Pay Scale Type: Civil

BPS: 16

Pay Stage: 11

Wage type		Amount	Wage type		Amount
0001	Basic Pay	52,930.00	1001	House Rent Allowance 45%	4,091.00
1210	Convey Allowance 2005	5,000.00	1300	Medical Allowance	1,500.00
1505	Charge Allowance	40.00	2148	15% Adhoc Relief All-2013	553.00
2199	Adhoc Relief Allow @10%	377.00	2316	Teaching Allowance 2021	3,782.00
2341	Dispr. Red All 15% 2022KP	4,812.00	2347	Adhoc Rel Al 15% 22(PS17)	4,812.00

Deductions - General

Wage type		Amount	Wage type		Amount
3016	GPF Subscription	-3,340.00	3501	Benevolent Fund	-1,500.00
3609	Income Tax	-564.00	4004	R. Benefits & Death Comp:	-650.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
------	-------------	------------------	-----------	---------

Deductions - Income Tax

Payable: 7,250.63 Recovered till APR-2023: 4,312.00 Exempted: 1811.93 Recoverable: 1,126.70

Gross Pay (Rs.): 77,897.00 Deductions: (Rs.): -6,054.00 Net Pay: (Rs.): 71,843.00

Payee Name: PERWEZ KAMAL KHAN

Account Number: 010-1787-8

Bank Details: UNITED BANK LIMITED, 211025 SARAI NAURANG SARAI NAURANG, LAKKI MARWAT

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: LK Domicile: - Housing Status: No Official

Temp. Address:

City: Email: parvezkamal897@gmail.com

JAVED IQBAL GULBELA
Advocate
Supreme Court Pakistan
(ASC # 5317)

System generated document in accordance with APPM 4.6.12.9(360663/26.04.2023/v3.0)

* All amounts are in Pak Rupees

* Errors & omissions excepted (SERVICES/03.05.2023/21:43:40)

Impugned Notification

"C"

- 20 -



Promotion Order of SST (Deferred) of District Lakki Marwat (M) 2023
Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Notification

Consequent upon the recommendation of the Departmental Promotion Committee in its meeting held on 19/01/2023 and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.SO(H&A)/1-18/1&SI/2012 dated 11.7.2012 and Finance Department Endorsement No.SO(FR/PI)/ 10-22(P)2010 dated 16.7.2012, the following CT/SCT, DM/SDM, AT/SAT, TT/STT, Qur/S.Qur and PSIT/SPSI/PSI (Male) are promoted to the posts of SST (General), SST (Bio/Chem) and SST (Maths/Phy) in BPS-16 (Rs.28070-2260-95870) respectively, plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect.

SST (Bio/Chem)

ITEM NO.1:- PROMOTION OF CT/SCT TO SST (Bio/Chem) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(Bio/Chem)	14
25% Initial Recruitment Quota	3.5=3
75% by Promotion Quota	10.5=11
40% CT/SCT Promotion quota to SST(Bio/Chem)	5.6=5
Proposed for Promotion to SST(Bio/Chem)	5

S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular CT	Academic & Professional Qualification	Remarks
1.	76	Abdul Ghaffar Khan (CT)	GHS Nar Muzafar Khan	22-04-1969	12-04-2017	B.A +Add Sci Subject MA/CT, B.Ed BC Add	Services are placed at the disposal of DEO Male Lakki Marwat for further adjustment for promotion to the post of SST (B/C) in BPS-16 on regular basis with immediate effect.
2.	147	Shaheed Ullah Khan (CT)	GHS Mir Azam Michen Khel	02-05-1987	27-05-2014	B.A +Add Sci Subject BSc/CT, B.Ed, M.Ed Add; M/P, B/C	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (Bio/Chem) BPS-16. Appointed on Acting Charge basis.

ITEM NO.2:- PROMOTION OF DM/SDM TO SST (Bio/Chem) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(Bio/Chem)	14
25% Initial Recruitment Quota	3.5=3
75% by Promotion Quota	10.5=11
4% DM/SDM Promotion quota to SST(Bio/Chem)	0.56=1
Proposed DM/SDM for Promotion to SST(Bio/Chem)	01

S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular DM	Academic & Professional Qualification	Remarks
------	------	------------------	----------------	---------------	---------------------------------------	---------------------------------------	---------

DIRECTOR GENERAL
 EDUCATION
 GOVERNMENT OF PAKHTUNKHWA
 (ABC # 3007)

- 21 -
Promotion Order of SST (Deferred) of District Lakkī Marwat (M) 2023

1.	43	Momina Khan	GMS Mirmundi Multan	12-01-1980	25-01-2012	B.A +Add Sci Subject MSc HPP, B.Ed	Services are placed at the disposal of DEO Male Lakkī Marwat for further adjustment for Promotion to the post of SST (B/C) in BPS-16 on regular basis with immediate effect.
----	----	-------------	---------------------	------------	------------	--	--

ITEM NO.3:- PROMOTION OF AT/SAT TO SST (Bio/Chem) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(Bio/Chem)	14
25% Initial Recruitment Quota	3.5=3
75% by Promotion Quota	10.5=11
4% AT/SAT Promotion quota to SST(Bio/Chem)	0.56=1
Proposed AT/SAT for Promotion to SST(Bio/Chem)	01

S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular AT	Academic & Professional Qualification	Remarks
1.	34	Umar Payao	GIS Titter Khel	05-06-1976	30-04-2009	B.A +Add Sci Subject MA, B.Ed	Services are placed at the disposal of DEO Male Lakkī Marwat for further adjustment for Promotion to the post of SST (B/C) in BPS-16 on regular basis with immediate effect.

ITEM NO.4:- PROMOTION OF TT/STT TO SST (Bio/Chem) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(Bio/Chem)	14
25% Initial Recruitment Quota	3.5=3
75% by Promotion Quota	10.5=11
4% TT/STT Promotion quota to SST(Bio/Chem)	0.56=1
Proposed TT/STT for Promotion to SST(Bio/Chem)	01

S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular TT	Academic & Professional Qualification	Remarks
1.	31	Muhammad Iqbal (TT)	GMS Kotka Mehmood	09-03-1982	14-03-2015	B.A +Add Sci Subject MA, B.Sc B/C B.Ed	Services are placed at the disposal of DEO (M) Lakkī Marwat for further adjustment against the post of SST (Bio/Chem) BPS-16. Appointed on Acting Charge basis.

ITEM NO.5:- PROMOTION OF PST/SPST/PSHT TO SST (Bio/Chem) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(Bio/Chem)	14
25% Initial Recruitment Quota	3.5=3
75% by Promotion Quota	10.5=11
20% PST/SPST/PSHT to SST(Bio/Chem)	2.8=3
Proposed PST/SPST/PSHT for Promotion to SST(Bio/Chem)	03

[Signature]
District Lakkī Marwat

S.N	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular PSHT	Academic & Professional Qualification	Remarks
1.	417	Zakria Khan	GPS Gull Khel Bettani	03/11/1977	13/10/2006	B.Sc B/C Addl B.Ed	Services are placed at the disposal of DEO Male Lakki Marwat for further adjustment for Promotion to the post of SST (B/C) in BPS-16 on regular basis with immediate effect.
2.	428	Muhammad Jamil	GPS Yaqoob Abad Landiwah	15-02-1981	23-04-2019	B.A +Add Sci Subject, B.ED	Services are placed at the disposal of DEO Male Lakki Marwat for further adjustment for Promotion to the post of SST (B/C) in BPS-16 on regular basis with immediate effect
3.	431	Pervaiz Kamal	GPS Nar Pur Dil Begu Khel	01-01-1982	23-04-2019	B.SC(B/C), B.Ed	Promotion Order No. 3997-4001 Dated: 01-12-2022 extent to Serial No.2 in PST/SPT/PSHT to SST B/C is hereby withdrawn, being junior to Seniority No 417, as reported by DEO Male Lakki Marwat vide letter No 623 dated 18/01/2023.

C. SST (Maths/Phy)

ITEM NO.1:- PROMOTION OF CT/SCT TO SST (Maths/Phy) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(Maths/Phy)	23
25% Initial Recruitment Quota	5.75=6
75% by Promotion Quota	17.25=17
40% CT/SCT Promotion quota to SST(Maths/Phy)	9.2=9
Proposed for Promotion to SST(Maths/Phy)	09

S.N	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular CT	Academic & Professional Qualification	Remarks
1.	120	Rafi Ullah (SCT)	GSBAKHSS Naurang	02-02-1971	19-12-2014	B.A +Add Sci Subject MA, PED	Services are placed at the disposal of DEO Male Lakki Marwat for further adjustment for Promotion to the post of SST (Maths/Phy) in BPS-16 on regular basis with immediate effect.



- 23 -

Promotion Order of SST (Deferred) of District Lakki Marwat (M) 2023

2.	123	Damsaz Khan (SCT)	GHIS Ghazni Khel	16-04-1978	11-11-2010	B.A +Add Sci Subject MA, B.Ed	Services are placed at the disposal of DEO Male Lakki Marwat for further adjustment for Promotion to the post of SST (Maths/Phy) in BPS-16 on regular basis with immediate effect.
3.	10	Akbar Zaman (CT)	GMS Mash Masti Khani	15-01-1973	19-12-2014	B.Sc+Addl CT, B.Ed M/P	Services are placed at the disposal of DEO Male Lakki Marwat for further adjustment for Promotion to the post of SST (Maths/Phy) in BPS-16 on regular basis with immediate effect.
4.	75	Abdul Hameed Khan (CT)	GHS Kotka Hayat Ullah	14-06-1974	12-04-2017	BA+Addl Sci Subject MA, CT, B.ED	Services are placed at the disposal of DEO Male Lakki Marwat for further adjustment for Promotion to the post of SST (Maths/Phy) in BPS-16 on regular basis with immediate effect.
5.	99	Muhammad Farooq (CT)	GHS Ghazni khel	26-10-1976	07-11-2017	BSc + Addl Subject MA, CT, B.Ed	Services are placed at the disposal of DEO Male Lakki Marwat for further adjustment for Promotion to the post of SST (Maths/Phy) in BPS-16 on regular basis with immediate effect.
6.	129	Imran Ali Khan (CT)	GSBAKHSSS eraiNaurang	15-04-1985	07-11-2017	B.A +Addl + Sci Subject B.Ed	Services are placed at the disposal of DEO Male Lakki Marwat for further adjustment for Promotion to the post of SST (Maths/Phy) in BPS-16 on regular basis with immediate effect.
7.	131	Muhammad Jamshed (CT)	GMS Sarai Naurang	15-02-1979	07-11-2017	B.A + Addl Sci Subject MSC/CT, B.Ed	Services are placed at the disposal of DEO Male Lakki Marwat for further adjustment for Promotion to the post of SST (Maths/Phy) in BPS-16 on regular basis with immediate effect.

ITEM NO.2:- PROMOTION OF DM/SDM TO SST (Maths/Phy) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(Maths/Phy)	23
5% Initial Recruitment Quota	5.75=6
5% by Promotion Quota	17.25=17
% DM/SDM Promotion quota to SST(Maths/Phy)	0.92=1
Proposed DM/SDM for Promotion to SST(Maths/Phy)	01

Promotion Order of SST (Deferred) of District Lakki Marwat (M) 2023

S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular DM	Academic & Professional Qualification	Remarks
1.	49	Iqram Ullah (DM)	GSDAKHSS Naurang	14-09-1984	27-05-2014	BSc + Add (Phy) B.Ed	Services are placed at the disposal of DEO (M) Lakki Marwat for further adjustment against the post of SST (Maths/Phy) BPS-16. Appointed on Acting Charge basis.

ITEM NO.3: PROMOTION OF TT/STT TO SST (Maths/Phy) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(Maths/Phy)	23
25% Initial Recruitment Quota	5.75=6
75% by Promotion Quota	17.25=17
4% TT/STT Promotion quota to SST(Maths/Phy)	0.92=1
Proposed TT/STT for Promotion to SST(Maths/Phy)	01

S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular TT	Academic & Professional Qualification	Remarks
1.	24	Muhammad Ibrahim	GHS Zafar Mama Khel	07-10-1979	24-09-2005	BA + Addl Sci Subject B.Ed	Services are placed at the disposal of DEO Male Lakki Marwat for further adjustment for Promotion to the post of SST (Maths/Phy) in BPS-16 on regular basis with immediate effect.

ITEM NO.4:- PROMOTION OF PST/SPST/PSHT TO SST (Maths/Phy) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(Maths/Phy)	23
25% Initial Recruitment Quota	5.75=6
75% by Promotion Quota	17.25=17
20% PST/SPST/PSHT to SST(Maths/Phy)	4.6=4
Proposed PST/SPST/PSHT for Promotion to SST(Maths/Phy)	04

S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular PSHT	Academic & Professional Qualification	Remarks
1.	354	Gbulam Mustafa	GPS Baghban	21-12-1971	14-06-2017	BSc + Add (M/P), B.ED	Services are placed at the disposal of DEO Male Lakki Marwat for further adjustment for Promotion to the post of SST (Maths/Phy) in BPS-16 on regular basis with immediate effect.

Promotion Order of SST (Deferred) of District Lakkh Marwat (M) 2023

2.	363	Shah Alam	OPN No. 5 Shorl Khal	02-12- 1979	14-06-2017	PHo. + Add (Phy), B. ED	Services are placed at the disposal of D/O Male Lakkh Marwat for further adjustment for promotion to the post of SST (Maths/Phy) in BPS-16 on regular basis with immediate effect.
----	-----	-----------	----------------------------	----------------	------------	----------------------------	--

Terms and Conditions:-

- 1 They shall be on probation for the period as specified in Rules (13) substituted vide No. SO (Postals) / IS&AD / 1-3/2017 Dated: 07-12-2017 in Appointment, Promotion and Transfer Rules, 1989.
- 2 They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 3 Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
- 4 Charge report should be submitted to all concerned.
- 5 Their Inter-Se- seniority on lower post will remain intact as per Rules (17)(4) of Appointment, Promotion and Transfer Rules, 1989.
- 6 No TADA is allowed for joining the duty.
- 7 They will give an undertaking to be recorded in their service books to the effect that if any over payment is made to them in light this order, will be recovered and if they are wrongly promoted, they will be reversed.
- 8 Before handing over charge, their documents may be checked. If they have not the required relevant qualification as per rules, they may not be handed over the charge of the post.

Note:

(1) This Notification issued in light of the notification No. P.10(1)/2023-Elec-II, Dated 10/03/2023 by the Election Commission of Pakistan and further Endorsed by E&SED vide No. SO (Primary/Male) E&SED/2-2/posting-transferring/2023 dated 14/03/2023.

(Hafiz Dr. Muhammad Ibrahim)

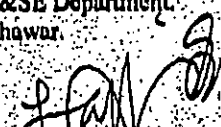
Director

Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Encls: No. 9256-60 / File No. 1/Promotion of SST (BPS-16)/2022 Dated Peshawar the 15/03/2023

Copy forwarded for information and necessary action to the:-

1. District Education Officer (M) Lakkh Marwat.
2. District Accounts Officer Lakkh Marwat.
3. Officials Concerned.
4. Principal/HM Concerned.
5. PS to the Secretary to Govt. Khyber Pakhtunkhwa E&SE Department.
6. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
7. M/Files.


Assistant Director (Establishment)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar



(14) - 26 - "D"

**OFFICE OF THE DISTRICT EDUCATION OFFICER
MALE LAKKI MARWAT**

☎ 03291, semtel, @yahoocom, f /facebook.com/dyemalaki, www.districteducation.com/400-1331

OFFICE ORDER:

In pursuance to the Director Elementary & Secondary Education Khyber Pakhtunkhwa Notification bearing No. 9256-60 /File No.1/Promotion of SST (BPS-16) Dated 15-03-2023 the following SST (Bio / Chem) and SST (Math/Physics) are hereby adjusted in the schools mentioned against each, in the interest of public service with immediate effect.

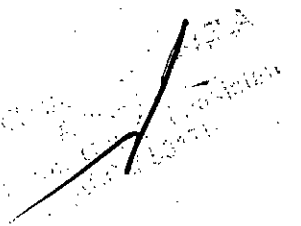
S.No.	Name with present place of posting	Further Place of Posting as SST	Remarks
SST (Bio/Chem)			
1.	Abdul Ghaffar Khan CT GHS Nar Muzaffar Khan	GHS Adamzai	A.V.P
2.	Shahced Ullah Khan CT GHS Mir Azam Michen khel (a.c.b)	GHS Wanda Shahab Khel	A.V.P
3.	Momin Khan DM GMS Marmandi Multan	GHS Top Tkhti Khel	A.V.P
4.	Umar Payan SAT GHS Titter Khel	GHS Ghazni Khel	A.V.P
5.	Muhammad Iqbal TT GMS Kotka Mehmood (a.c.b)	GHS Abdul Khel	A.V.P
6.	Zakria Khan PSHT GPS Guli Khel Bettani	GHS Tajori No.1	A.V.P
7.	Muhammad Jamil PSHT GPS Yacoob Abad Landiwah	GHS Abba Khel	A.V.P
SST (Maths/Phy)			
8.	Rafi Ullah SCT GSHBAKHSS Serai Naurang	GHS Wanda Shahab Khel	A.V.P
9.	Damsaz Khan SCT GHS Ghazni Khel	GHS Masha Mansoor	A.V.P
10.	Akbar Zaman CT GMS Mash Masti Khani	GHS Mandan Manjiwala	A.V.P
11.	Abdul Hameed Khan CT GHS Kotka Hayat Ullah	GHS Baist Khel	A.V.P
12.	Muhammad Farooq CT GHS Ghazni Khel	GHS Pahar Khel Pacca	A.V.P
13.	Imran Ali CT GHS Mama Khel Marwat	GHS Mangala	A.V.P
14.	Muhammad Jamshed CT GMS Serai Naurang	GHS Top Takhti Khel	A.V.P
15.	Iqram Ullah DM GSHBAKHSS Serai Naurang (a.c.b)	GHS Shakh Quli Khan	A.V.P
16.	Muhammad Ibrahim STT GHS Zafar Mama Khel	GHS Nar Muhammad Ghazni Khel	A.V.P
17.	Ghulam Mustafa PSHT GPS Baghban Lakki	GHS Ahmed Khel	A.V.P
18.	Shah Alam PSHT GPS No.5 Sheri Khel	GHS Wanda Zar Khan Sur Band.	A.V.P

CONSEQUENTIAL TRANSFER ORDER

S.No.	Name with present place of posting	Further Place of Posting as SST	Remarks
1.	Akbar Jan SST (Bio/Chem) GHS Abdul Khel	GHS No.3 Lakki	A.V.P
2.	Latif Ullah Khan SST (Math/Physics) GHS Wanda Samani	GHS Pahar Khel Thall	A.V.P

TERMS AND CONDITIONS:

- Charge report should be submitted to all concerned.


 District Education Officer
 Male Lakki Marwat

2. No TA/Da is allowed for joining the duty.
3. Terms and conditions of their notification issued vide Director Elementary & Secondary Education Khyber Pakhtunkhwa No.9256-60 Dated 15-3-2023 will remain intact.

District Education Officer
(Male) Lakki Marwat

Encl No. 2415-22

Dated 20/03/2023

Copy to the:

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar with reference to h office no. & Date cited above.
2. Deputy District Education Officer (Male) Local Office.
3. District Accounts Officer Lakki Marwat.
4. District Monitoring Officer (EMA) Lakki Marwat.
5. SDEO (Male) Concerned.
6. Principals/Head Masters Schools Concerned.
7. AP DEMIS Local Office.
8. Teachers concerned.

N. S. 18/03/23
District Education Officer
(Male) Lakki Marwat

JAMES HETAL / LATLA
DISTRICT EDUCATION OFFICER
LAKKI MARWAT

(1)

(28)

Am-2

بخدمت جناب سیکرٹری صاحب ایلیمینٹری اینڈ سیکنڈری ایجوکیشن ڈیپارٹمنٹ صوبہ خیبر پختونخواہ پشاور

درخواست (اپیل) برائے واپسی احکامات آرڈر نمبر 60-9256 مورخہ 15 مارچ 2023

جناب عالی!

نہایت مؤدبانہ گزارش کی جاتی ہے کہ سائل مورخہ 1 دسمبر 2022 کو آرڈر نمبر 3997-4001 کے تحت PSHT سے (Bio/Chem) پر پروموٹ ہونے کے احکامات صادر ہوئے۔ جس کی روشنی میں ڈسٹرکٹ ایجوکیشن آفیسر ضلع کئی مروت نے مورخہ 12 دسمبر 2022 آرڈر نمبر 37-8230 کے تحت سائل کو گورنمنٹ ہائی سکول ٹاپ تختی خیال ضلع کئی مروت میں SST (BPS-16) Bio/Chem کے احکامات صادر فرمائے۔ سائل نے عرصہ تقریباً 4 مہینے احسن طریقے سے فرائض سرانجام دیے اور دستارہا۔ سائل کو بطور SST (Bio/Chem) BPS 16 تنخواہ بھی جاری ہوئی۔

جناب والا شان! سائل کو معلوم ہوا کہ آرڈر نمبر 60-9256 مورخہ 15 مارچ 2023 کو سائل کو With draw کے احکامات صادر ہوئے۔

جناب والا شان! سائل ایک ایماندار اور فرض شناس شخصیت کا مالک ہے سائل نے پورے سروس میں افسران کو کسی قسم کی کوتاہی کا موقع نہیں دیا ہے۔

لہذا بذریعہ درخواست التجا کی جاتی ہے کہ سائل کے with draw کے نوٹیفیکیشن واپس کرنے کے احکامات صادر فرمائیں۔

سائل آپ کے دامت اقبال کیلئے ہمہ وقت دعا گو رہے گا۔

شکریہ

مورخہ: 21-03-2023

العارض

پرویز کمال، ولد عبد الرحیم خان

سکنہ نار اسپر لائی ڈاکخانہ نار مظفر خان

تحصیل سرانے نورنگ ضلع کئی مروت

رابطہ نمبر: 03006490687

واٹس اپ نمبر: 03059138442

JAVED IOBA GULBELA
Advocate
Supreme Court of Pakistan
(ASC # 5317)

Impugned Office
Order - 29 -

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) LAKKI MARWAT

OFFICE ORDER

In pursuance to the Director Elementary & Secondary Education Khyber Pakhtunkhwa Notification bearing No. 9256-60/File No.1/Promotion of SST (BPS-16)/2022 dated 15/3/2023, the promotion order in respect of Mr. Parvaiz Kamal PSHT GPS Nar Purdil Begu Khel to the post of SST (Bio-Chem), notified vide Director E& SE notification bearing no 3997-4001 dated 1/12/2022, Item No.5 Serial No.2, is hereby withdrawn (erroneously promoted being junior to official bearing Seniority no 417)

Consequent upon the above, the District Education Officer (M) Lakki Marwat, being competent authority, is further pleased to adjust him against the vacant post of Primary School Head Teacher (B-15) in GPS No 1 Baist Khel

- Note: 1. No TA/DA Is Allowed.
2. Charge report should be submitted to all concerned.

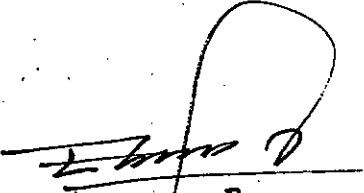
DISTRICT EDUCATION OFFICER
(M) LAKKI MARWAT

Endst: No. 2516-21

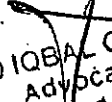
Dated. 24/03/2023

Copy to the:

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa with ref: to his No.9256-60 dated 15-03-2022
2. District Accounts Officer Lakki Marwat.
3. District Monitoring Officer Lakki Marwat EMA Lakki Marwat.
4. Head Master GHS Top Takhti Khel to relive Mr. Parvaiz Kamal SST (B/C) immediately.
5. SDEO (M) Serai Naurang for necessary entry in his service book.
6. Teacher Concerned to assume the charge of PSHT


91C 287/3
2023
Head Master
G.H.S Top Takhti Khel
Lakki Marwat


DISTRICT EDUCATION OFFICER
(M) LAKKI MARWAT


JAVED IQBAL GULBELA
Advocate
Supreme Court of Pakistan
(ASC # 5317)

-30- Ann^c

**MOST
IMMEDIATE**



**GOVERNMENT OF
KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**

No. SO(DARC/E&SED)/1-17/23
Dated Peshawar, the 06.07.2023

To
The Section Officer (Primary Male),
E&SE Department.

Subject: **GRC DECISION REGARDING CASE TITLE:**

- i. **Hamza Khan Afridi S/O Khalil Khan Afridi (Lr) SET BS-16**
- ii. **Parvez Kamal S/O Abdur Rahim Khan**

I am directed to refer to the subject noted above and to enclose herewith letter of even No. dated 20.06.2023 alongwith minutes of the GRC meeting held on 13.06.2023 wherein the GRC has decided the subject cases vide agenda items 53 and 54 respectively.

In view of the above, it is, therefore, requested that both cases be processed in light of GRC decision and implementation thereof be completed and reported to this office at the earliest, please.

ENCLOSURE
2-3-2023



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
CIVIL SECRETARIAT PESHAWAR
(Phone No.091-9223587)

-31-

No.SO (Primary-M)/E&SED/2-2/Appt/saddam/Peshawar/2023
Dated Peshawar 10th July, 2023

To

District Education Officer (Male)
District Khyber and Lakki Marwat.

Subject:- GRC DECISION REGARDING CASE (HAMZA KHAN AFIRDI AND PARVEEZ KAMAL).

I am directed to refer to the subject noted above and to enclose here with a copy of Section Officer (DARC) Elementary & Secondary Education Department letter No. SO (DARC)/E&SED/1-1/2023 dated 06-07-2023 and to state that a meeting is scheduled to be held on 13 July, 2023 at 11:00 AM under the Chairmanship of Additional Secretary (Establishment) in his office on the following agenda item.

Agenda Item No.	Name of the Petitioner	Claims of the Appellants / Prayer	Competent Authority	Decision
40	Hamza Khan Afridi S/o Khalil Khan (Base), SET BS-15	Request for appointment under deceased son's quota. His father was appointed SET (BS-16) on contract basis vide order dated 22-09-2004 KP Civil Servants Act 1973 provided that those who are appointed in the prescribed manner to a service or post on or after the first July, 2011 till 23 rd July 2005 on contract basis shall be regularized.	DEO (M) Khyber	The case has been referred to Additional Secretary (Establishment) E&SE for examining as per rules & policy and decided the same through a speaking order within one month.
54	Parveez Kamal S/o Abdur Rani Khan	The applicants says that he was once promoted to SST and he draw four months salary but unfortunately he has been reverted by the DEO Office Lakki Marwat.	DEO (M) Lakki Marwat	The case has been converted to departmental appeal by the GRC and AS (E) will give special hearing to the petitioner and issue speaking orders accordingly.

(MUHAMMAD ISHAQ)
SECTION OFFICER (PRIMARY MALE)

Copy forwarded to the:

- 1 Director Elementary & Secondary Education Khyber Pakhtunkhwa with the request to depute a well conversant officer for the said meeting.
- 2 PS to Secretary, E&SE Department Khyber Pakhtunkhwa.
- 3 PA to Additional Secretary E&SE Khyber Pakhtunkhwa.

(Signature)
13/7/23

BETTER COPY()

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMNETARY & SECONDARY EDUCATION DEPARTMENT
CIVIL SECRETARIAT, PESHAWAR
(PHONE NO. 01-9223587)

No. SO(Primary-M)E&SED/2-2/Apptt/saddam/Peshawar/2023

Dated: Peshawar 10th July 2023

To

District Education Officer (Male)
District Khyber and Lakki Marwat.

Subject: GRC DECISION REGARDING CASE (HAMZA KHAN AFRIDI AND PARVEZ KAMAL)

I am directed to refer to the subject noted above and to enclose here with a copy of the Section Officer (DARC) Elementary & Secondary Education Department letter No. SO (DARC)/E&SED/1-1/2023 dated: 06-07-2023 and to state that a meeting is scheduled to be held on 13 July 2023 at 11:00 am under the chairmanship of Additional Secretary (establishment) in his officer on the following agenda item.

Agenda Item No.	Petitioner	Claims of the Appellants/Prayer	Competent Authority	Decision
40	Hamza Khan Afridi S/o Khalid Khan (late) SET BS-16.	Request for appointment under deceased son's quota. His father was appointed SET (BPS016) on contract basis vide order dated: 22-09-2004 KP Civil Servants Act 1973 provided that those who are appointed in the prescribed manner to a service or post on or after first July, 2011 till 23 rd July 2005 on contract basis shall be regularized.	DEO (M) Khyber	The case has been referred to Additional Secretary (Establishment) E&SE for examining as per rules and policy and decided the same through speaking order within one month.
54	Parvez Kamal S/o Abdur Rahim	Applicant says that he was once promoted to SST, so he withdrew four months salary but he has been reverted by the DEO Office Lakki Marwat.	DEO (M) Lakki Marwat	Case has been converted to departmental appeal by the GRC and AS will give special hearing to the petitioner and issue speaking orders accordingly.

(MUHAMMAD ISHAQ)
SECTION OFFICER (PRIMARY MALE)

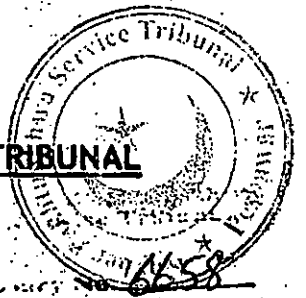
Copy forwarded to the;

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa with the request to depute a well conversant officer for the said meeting.
2. PS to Secretary E&SE Department, KP.
3. PA to Additional Secretary E&SE, KP.

MINUTES OF THE MEETING OF GRIEVANCES REDRESSAL COMMITTEE

				appointed, thus the legitimate right of the applicant is not extended to the applicant".		
50	05	Muhammad Zaheer Ahmad S/O Khawaja Muhammad	Appeal for justice	The applicant says that he got 17 th position in merit lists and requested to appoint him against the posts which was lying vacant due to resignation of Azizullah and Amir Nawaz Ex-PST now school leader.	DEO (M) Lakki Marwat	Regretted by the forum for lapse of six months.
51	06	Muhammad Faizan Khan S/O Hakim Khan	Appeal for justice	The applicant says that he got 17 th position in merit lists and requested to appoint him against the posts which was lying vacant due to resignation of Azizullah and Amir Nawaz Ex-PST now school leader.	DEO (M) Lakki Marwat	Regretted by the forum for lapse of six months.
52	07	Fida Ullah S/O Asmat Ullah Khan	Appeal for justice	The applicant stated that when that at the time of appointment of Mr. Amir Sohail, he demanded money from me being next Meritorious at Sl.33. however, he could not paid. Now, he resigned from his post, therefore, now the applicant requested for appointment.	DEO (M) Lakki Marwat	The case has been referred to DSC for consideration in the next DSC, purely on merit & policy.
53	08	Gul Faraz Khan	W.P No 386-B/2022 Peshawar High Court, Bannu Bench, order dated 02.05.2023	The petitioner wants service regularization with all back benefits w.e.f 08.05.1994	DEO (M) Lakki Marwat	The case has been examined by the GRC and it is pointed out that the case is purely an Establishment matter, it is therefore, directed that AS (E) will give special hearing to the petitioner and issue speaking order.
54	09	Parveez Kamal S/O Abidur Rahim Khan 03059138442	Appeal for justice	The applicants says that he was once promoted to SST and he draw four months' salary but unfortunately he has been reverted by the DEO office Lakk Marwat	DEO (M) Lakki Marwat	The case has been converted to departmental appeal by the GRC and AS (E) will give special hearing to the petitioner and issue speaking orders accordingly.
55	10	Asmat Ullah Khan, PSHT	Appeal for re-instatement as PSHT	The applicant has requested for re-instatement as PSHT. The same had been downgraded from BS-15 to BS-14 by the concerned office.	DEO (M) Lakki Marwat	The Director E&SE is directed to dispose-off the case within 02-weeks positively.

-33- (1)



**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL
PESHAWAR**

In S.A. 1510 /2023

Dated 21/07/23

Pervez Kamal S/o Abdur Rahim Khan R/o Nar Supertai, P/O Serai Norang, Nar Kashmir Musa khel, Tehsil Serai Norang, District Lakki Marwat.

--Appellant

VERSUS

1. **Secretary Elementary and Secondary Education, Khyber Pakhtunkhwa, Civil Secretariat Peshawar.**
2. **Director Elementary and Secondary Education Khyber Pakhtunkhwa at Directorate Elementary and Secondary Education, Peshawar.**
3. **District Education Officer Lakki Marwat**

--- Respondents

Appeal u/s 4 of the hyber Pakhtunkhwa Service Tribunal Act 1974 against the impugned Order Dated.24/03/2023 of the Office of District Education Officer Lakki Marwat whereby the promotion order of the Appellant has been illegally withdrawn in a classically cursory and whimsical manner.

*Filed on day
Month*

Respectfully Sheweth:

1. That the Appellant is a naturally born bona-fide citizen of Islamic Republic of Pakistan and hails from a respectable family.
2. That after going through mandatorily required criteria laid down for selection and appointment, the Appellant got appointed as Primary School Teacher (BPS-12) years back.
3. That even after serving for many years the Appellant's career is clean and clear of any sort of sordid or sordidage, and there has never been any complaint whatsoever even moved against the Appellant.

Certified to be true copy

**EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar**
15/8/23

*Secretary Pakistan
5-17*

10.08.2023



Learned counsel for the appellant present.

Learned counsel for the appellant wants to amend

the memo and grounds of appeal. Granted. To come up

for amended appeal on 28.09.2023 before S.B. P.P. given

to learned counsel for the appellant.

(Muhammad Akbar Khan)

Member (I)

Kamranullah

Certified to be true copy

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

Date of Presentation of Application 15/8/23

Number of Words 27

Copying Fee 10/-

Urgent 15/8/23

Total 15/8/23

Name of Copyist _____

Date of Completion 15/8/23

Date of Delivery of Copy 15/8/23