BEFORE THE HO'NBLE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR.

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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

Through

Dated: September 19th, 2023

APPELLANT,

Javed Iqbal/Gulbela Advocate, Supreme Court.

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 Pakhutnkhwa, 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.

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, WHEREBY THE PROMOTION ORDER OF THE APPELLANT HAS BEEN ILLEGALY WITHDRAWN IN A CLASSICAL CURSORY AND WHIMSICAL MANNER.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

-3-

<u>GROUNDS:</u>

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 Iobal Gulbela Advocate, Supreme Court.

Ms. Syeda Ume/Habiba Advocate. NOTE:

Mr. Saghir Igbal Gulbela Advocate, High Court. Mr. Arif Mohmand Advocate.

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.

Through

Advoeates

SERVICE TRIBUNAL PESHAWAR

-5-

Ammended Appeal No.____/2023

S.Appeal No.1540/2023

In

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.

Through

Dated: September 19th, 2023

APPELLANT,

Javed Iqbal Gulbela Advocate, Supreme Court.

Saghir Laba Gulbela Advocate, High Court.

EFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

-7-

S.Appeal No.1540/2023

Parvez Kamal

Versus

Govt of KPK & Others

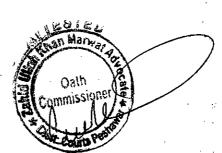
AFFIDAVIT

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 Pakhutnkhwa, 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 Z Advocate Stapreme Court.

Through

Saghir I bal Gulbela Advocate, High Court.

Promotion Order of SST of District Lakki Marwal (M) 2022

AN



Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

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/STT, 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. <u>SST (General)</u>

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

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

S. No	Sen #	Name of official	Name of School	Date of Birth	Date of 1st Appointme nt as Regular CT	Academic & Professional Qualification	Remarks
1.	1	Mir Kabul Khan	GHSS Sarai Naurang	01-10-1963	20-10-1982 S	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	97 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 Nuarang	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.

Page 1 of 7

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

•		and the second		Promotio	on Order of SS	T of District I	Lakki Marwat (M) 2022
7	43	Javed lqbal	GHS Isak Khel	01-08-1975	23-12-1999	MA,B.Ed	Services are placed at the disposal of DEO (M) Lakki Marwal for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
and the second on the processed	8. 45	A≲mat Ullah Khan	GHSS Wanda Amir	12-04-1967	£3-12-1999	MA,Gen ,CT,B.Eð	Services are placed at the disposal of DEO (M+Lakki Marwait 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)	and the second
25% Initial Recruitment Quota	
75% by Promotion Quota	and the second
4% DM/SDM Promotion quota to SST(G)	15 0.8=1
Proposed DM/SDM for Promotion to SST(G)	01
	and a second

a statut anna a statut a statut a st	S.No	Sen #	Name of official	Name of School	Date of Birth	Date of 1st Appointme nt as Regular DM	Academic & Professional Qualification	Remarks
		9	Yousaf Khan	GHS Nar Muzaffar Khan	10-02-1966	17-12-1989	MA, B.EU	Services are placed at the disposal of DEO (M) Lakki Maricat for further adjustment ugainst 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	and a second second I second seco
75% by Promotion Quota	15
4% AT/SAT Promotion quota to SST(G)	0.8=1
Proposed AT/SAT for Promotion to SST(G)	Ót
	and the second

S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointme nt as Regular	Academic & Professional Qualification	Remarks
1.	18	Hidəyat Ur Rehman	GSBAKHSS Naurang	12-02-1970	05-04-1999	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.

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-

recommended as under:-			
Total No. of Vacant Post of SST(G)	nan na papa na 1971, p. 1979, provinsi na papa	nacional francisco esta esta construcción en esta esta esta esta esta esta esta esta	
25% Initial Recruitment Quota	ander an der Berneten um gin ihr gesonen von Frägen und Hinz will anderen Beigen.	5	
75% by Promotion Quota	nantanter (nag) i su panyanakan ninakan (ing), gi si tingk	15	}
4% TT/STT Promotion quota to SST(G)		0.8=1	
Proposed TT/SIT for Promotion to SST(G)		01	

Page 2 of 7

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JAVED ICBAL GULBELA Advocate Suprem Court of Pakistan (ASC # 5317)

Promotion Order of SST of District Lakki Marwat (M) 2022 ιl Date of 1st Date of Name of Appointme Academic & S.No Sen# Name of Birth ní as official School Professional Remarks Regular TT Qualification Services are placed at the disposal of DEO (M) Lakki Marwat for **GHS** Gandi Bismilllah Jan 1. 11 further adjustment 11-03-1971 16-09-2005 MA, B.Ed Khan Khel against the post of SST (G) BPS-16 on regular basis with immediate effect. TTEM 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 vacun Post of SST(G)	20
25% Initial Recruitment Quota	5
75% by Promotion Quota	15 Mg
20% PST/SPSTPSHT to SST(G)	4
Proposed PST/SPSTPSHT for Promotion to SST(G)	04

S.N	īυ	Sen #	Name of official	Name of School	Date of Birth	Date of 1st Appointm ent as Regular PST	Academic & Professiona] Qualificatio n	Remarks
1.		64	Insaf Ullah	GPS MUHAMM AD NAWAZ GHAZNI KHEL	63-02-1970	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

Page 3 of 7

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JAVED IOBAL GULBELA Addocatë Supreme Gourt of Pakistan (ASC # 5317)

		an a	<i>4</i> 7	Pro	motion Order	of SST of Dis	trict Lakki M	arwat (M) 2022 (19
A	S.240	Sen #	Name of official	Name of School	Date of Birth	Date of 1st Appointm ent as Regular CT	Academic & Professio nal Qualificat ion	Remarks
	8	113	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 fray	27-05-2014 7 //	B.Sc B/C B/C, E.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	9ff-1 27-05-2014	MSc/CT, B.Ed B/C	Services are pluced 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/SPSTPSHT to SST(Bio/Chem)	2.8=3
Proposed PST/SPSTPSHT for Promotion to SST(Bio/Chem)	03

1	•	•			· · · · · · · · · · · · · · · · · · ·	and the second	
S.N 0	Sen #	Name of official	Name of School	Date of Birth	Date of 1st Appointmen t as Regular PSHT	Academic & Professional Qualification	Remarks
	429	Muhammad Zaman	GPS Kotka Mahmood No.2	HN 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.
	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.

Page 4 of 7

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JAVED IQUE GULBELA Advorate Supreme Court of Pakistan (ASC # 5317)

4-14-1

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Promotion Order of SST of District Lakki Marwat (M) 2022

AO.3: - PROMOTION OF AT/SAT TO SST (Maths/Phy) BPS-16 ON REGULAR

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

ЯS

1 united by the second post of SST(Mathe/Dhu)	· · · · · · · · · · · · · · · · · · ·
22 Initial Recruitment Quota	23
75% by Promotion Quota	5.75=6
A AT/SAT Promotion	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
and a set of a lot a lot a solver a solver a solver a solver a solver and a solver a solver and a solver a so	

s.	No	Sen#	Nume of official	Name of School	Date of Birth	Date of 1st Appointment as Regular AT	Academic & Professional Qualification	Remarks
1.		24	Misbah 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 Appointm ent as Regular Qari	Academic & Professiona l Qualificatio n	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-i6 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:-

		Vacant Post of		/Phy)			23
25% li	nitial R	lecruitment Q	uota				5.75=6
75% b	y Prom	otion Quota			·		17.25=17
20% I	PST/S	PSTPSHT to	SST(Math	s/Phy)			4.6=4
		T/SPSTPSH			(Maths/Phy)		04
S.No	Sen #	Name of official	Name of School	Date of Birth	Date of 1st Appointme nt as Regular PSHT	Academic & Professiona l Qualificatio n	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.

Page 5 of 7

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GULBELA JAVED vocate Court of Pakistan Sup C # 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
<u>Tern</u>	ns ar	nd Condi	tions:-				with immediate offect.

on probation for the period as specified I Rules (15) substituted vide -No.SO(Plocies)/E&AD/1-3/2017 Dated, 07-12-2017 in Appointmet, Promotion and Transfer

- 2. They will be governed by such rules and- regulations as may be issued from time to time by
- 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 Appointmet, 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 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

/ File No.1/Promotion of SST (BPS-16)/2022 Endst: No Dated Peshawar the ol 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.

3997-4001

4. Principal/HM Concerned.

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Supreme Cou

- 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.

Assistant Dírector (Estab) Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

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Page 6 of 7

RELA

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(ASC # 5317)

OFFICE OF THE DISTRICT SDUCATION OFFICER MALE LAKKI MARWAT

OFFICE ORDER:

Consequent upon the recommendation of the Departmental Promotion Committee & in pursuance of the Govt of Knyber 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 Knyber Pakhthunkhwa Pashawar 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/SQari and PSHT/SPST/PST (Male) are herby promoted to the post of SST (General), SST (Bio-Chem) and SST (Maths/Phy) respectively in BPS-16 (RS28070-2260-95870), plus usual allowance as fadmissible 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 Fosting as SST	Remark
1	••••	Mir Kabal Khan SCT GSBAKHSS Serai Naurang	GSBAKHSS Serai Naurang	AVP
2		Mir Abbas Khan SCT GHS Zangi Khel	GHS Top Takhti Khel	A.V.P
3.		Abdul Qayum Khan SCT GSBAKHSS Serai Naurang		A.V.P
4.		Ikram Ullah SCT GHS Dallo Khel	GHS Daloo Khel	A.V.P
5.		Bashir Ahmed SCT GSBAKHSS Serai Naurang	GHSS Kheru Khail Pakka	AVP
6 .		Habib Ur Rehamn SCT GHSS Tajazai	GHSS Tajazai	A.V.P
7		Javed Igbal SCT GHS Isak Khel	GHS Shamoni Khallok	A.V.P
B .		Asmat Ullah Khan SCT GHSS Wanda Amir	GHS Wanda Bani	AVP
9		Yousaf Khan SDM GHS Nor Muzaffar Khan	GHS Wanda Aurang Zaib	A.V.P
10		Naurang	GHS Wanda Samandi	A.V.P
1		Bismillah Jan STT GHS Gandi Khan Khel	GHS Abassa Khattak	A.V.P
2.		Insaf Ullah PSHT GPS Muhammad Nawaz Ghazni Khel	GMS Nawaz Malla Khel	A.V.P
13.		Muhammad Ajmal Khan PSHT OPS Amin Jabu Khel		AVP
		Muhammad Igbal Khan PSHT GPS No.1Hagdad Abad Lakki	GHS Zar Khan Sur Band	A.V.P
S		Kiramat Ullah Khan PSHT GPS Kotka Sha'i Slaim	CHS Bragi	A,V.P
Ì		SST (Bio/Chem)	la de la companya de La companya de la comp	
6	83 83	Dilawar Shah SCT GSBAKHSS Serai Naurang.	GHS Abassa Khatlak	LVP
7		Akbar Jan CT GHS Mela Mandra Khel	GHSS Abdul Khel	.V.P
8	• •	Muhammad Daud Khan CT GMS Mullan Manjiwala		V.P
9		Muhammad Zaman PSHT GPS Kotka Melimood I No.2	GHS Wanda Aurang Zaib	V.P
o)	1 . 1	Parvaiz Kamal PSHT GPS Nar Pur Dil Begu Khel	SHS Top Takhu Khel A	VP B
		SST (Maths/Phy		P J O AN
7		fishah Ullah Khan AT GMS Wando Amir	SHS Mandan Manjiwala	PP-5

22.	Rafi Ullah Khan S,Qari GSMGKCMHS No.1 Lakki	GHS Dallo Khcl	A.V.P
23,	Noor Badshah PSHT GPS Jalu Khel	GHSS Kot Kashmir	A.V.P
24.5	Shah Baz Khan PSHT GPS Bakhmal Ahmad	GHS GPS Baisat Khel	A.V.P
	CONSEQUENTIAL TRANS	FER	

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- 1. They shall be on probation for the period as specified I 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 interse 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 duity.
- 7. They will give an under taking to by 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. 8% 30 Dated 12 /12/2022 Copy to the: 1. Director Elementary & Secondary Education Knyber, Pakhtunkhwa Peshawar with reference to his office No. & Date cited above. 2. Deputy District Education Officer (Male) Local Office. 3. District Accounts Officer Lakki Ma. wal. 4. District Monitoring Officer (EMA) Lakki Marwat 5. SDEO (Male) Concerned. 6. Principals/Head Masters Concerned. 7. AP DEMIS Local Office. 8. Teachers concerned. District Education Officer (Male) Lakki Marwat GULBELA JAVERIE oun of Pakistan C # 5317) Supreme

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Employn	nent Category: Active T	emporary		,			
	ion: SECONDARY SCH		ER	800030	83-DISTRICT O	JOVERNMENT K	HVRF
	de: LK6098-H.M GHS T						
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001 Ba			Amount 52 020 00	1001		ge type	Amount
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1 1	spr. Red All 15% 2022K		4,812.00		Adhoc Rel Al 1		4,812.00
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Loan .		· · · · · · · · · · · · · · · · · · ·	I	Princip	al amount	Deduction	Balance
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•	District Accounts Office Lakki	· · · ·	• .	(\mathbf{R})
•	Monthly Salary Statement (March-2023)			$\Pi \cap I$
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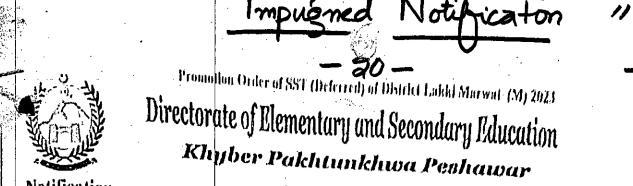


	ERWEZ KAMAL KHAN d/w/s of ABDU	R RAHIM KHAN
Personne Sumber: 00348547	CNIC: 1120103246419	NTN:
Date of Birth: 01.01.1982	Entry into Govt. Service: 16.10.2006	Length of Service: 16

h of Service: 16 Years 05 Months 017 Days

Designation	n: SECONDA	RY SCHOOI	L LEAL DE	-r ·	~~~~~		GOVERNMENT KI	
-	: LK6098-H.N			HEL				
Payroll Sec			Section: 00		Cash (lenter: 15	. •	• • •
-	No: 348547	_	Interest app			GPF Balanc	e: 486	534.00 (provisional)
Vendor Nu					• •		··· · · · · · · · · · · · · · · · · ·	
Pay and Al		Pay	y scale: BPS	For - 2022	Pay S	cale Type: Civ	il BPS: 16	Pay Stage: 11
	Wage	type		Amount		W	age type	Amount
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1210 Con	vey Allowance	2005		5,000.00	1300	Medical Allo	vance	1,500.00
1505 Cha	rge Allowance			40.00	2148	15% Adhoc R	elief All-2013	553.00
2199 Adh	oc Relief Allo	w @10%		377.00	2316	Teaching Allo	wance 2021	3,782.00
2341 Disp	r. Red All 159	<u>6 2022KP</u>		4,812.00	2347	Adhoc Rel Al	15% 22(PS17)	4,812.00
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	Wage	type		Amount	·	2	age type	Amount
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3609 Inco	me Tax			-564.00	4004	R. Benefits &	Death Comp:	-650.00
)eductions	- Loans and	Advances			• .			
Loan	;	Descrip	tion	-	Princi	pal amount	Deduction	Balance
Payable: Fross Pay Payee Nam	7,250.63 (Rs.): 77, he: PERWEZ K	Recovered 897.00 LAMAL KHA	Deduction	2023: 3,7 15: (Rs.):	48.00 - 6,054 .	Exempted:		erable: 1,690.53 /1,843.00
Payable: Gross Pay (Payee Nam Account N	7,250.63 (Rs.): 77, ne: PERWEZ R umber: 010-17 ils: UNITED E	Recovered 897.00 CAMAL KHA 87-8 ANK LIMIT	Deducti or	ıs: (Rs.):	-6,054.	00 1	Net Pay: (Rs.): ANG, LAKKI MARV	/1,843.00
Payable: Fross Pay Payee Nam Account N Bank Detai	7,250.63 (Rs.): 77, ne: PERWEZ K umber: 010-17	Recovered 897.00 CAMAL KHA 87-8 ANK LIMIT	Deducti or	15: (Rs.): 5 SARAI NA	-6,054. URANG	00 1	Net Pay: (Rs.): 7	/1,843.00
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Personal in	ormation of	Mr PERWEZ	Z KAM	AL KHAN dA	w/s of A B	DUR RAHIN	KHAN			
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Consequent upon the recommendation of the Departmental Promotion Committee in its meeting held on 19/01/2023 and in pursuance of the Clovernment of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.SO(11&A)/1-18/11&S11/2012 dated 11.7.2012 and Pluance Secondary random Notification No.SO(11&A)/1-18/18/88192012 dated 11.7.2012 and runned Department Endorsement No.SO(FR)/PD/ 10-22(B)2010 dated 16.7.2012, the following C1/SCT, DM/SDM, AT/SAT, TT/STT, Qari/S,Qari and PSITT/SPS1/PS1 (Male) are promoted to the posts of SST (General), SST (Blo/Chem) and SST (Maths/Phy) in BPS-16 (Rs.28070-2260-95876) policy of the Provincial Communication and distances to the rules on regular basis under the existing policy of the Provincial Communication of the terms of 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 CH/SCT TO SST (Blo/Chem) BPS-16 ON REGULAR BASIS

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S.No	Sen#	Name of official	Nume of School	Date of Blrth	Date of 1st Appointme nt as Regular CT	Academic & Professional Qualification	Remarks
1.	76	Abdul GhafTar Khan (CT)	GHS Nar Muzafar Khan	22-04-1969	12-04-2017 M	B.A +Add Scj Subject MA/CT, B.Fd BC Add	Services are placed at the disposal of DEC Male Lakki Marwat for further adjustment for Promotion to the post of SST (B/C) in BPS-16 or 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 Sei Subject BSe/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 hasis.

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

· · · · · · · · · · · · · · · · · · ·	
Fotal 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

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	S.No	Senll	Name of official	Nume of School	Date of Nirth	Date of 1st Appointmen t as Regular DM	Academic & Professional Qualification	Remarks
- 1				the second se				

Page 1 of 6

1			Promotion Or	der of SST (1)eferred) of 1)	ZI — listrict Lakki Ma	rwat (M) 2023
I.	MNO.	3:- PROMOTION	GMS Mormand Multan	N 12-04- 1980 -	25-04-201	B.A +Add So 2 Subject MSo HPB,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 or much
Tota	ul No, o	f Vacant Post of SS Recruitment O		<u></u>	lhem) BPS-16	ON REGULAR	BASIS
	o umum	Sectoritan and	(Dio/Chem)				14
1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1	, vi i iu	111010303 / 3					3.5=3
Prop	neal 1	T Promotion quot T/SAT for Promot	a to SST(Bio/C	lions			10.5=11
	Nacu A	T/SAT for Promot	ion to SST(Bio/C	Them)			0.56=1
[┱╧┼╾╼╼						01
S.N 0	Sen#	Name of official	Nume of School	Date of Birth	Date of 1st Appointmen t as Regular AT		Remarks
I.	. 34 M NO.	Umar Payao	GHS Titter Khel	05-06-1976 Harr	30-04-2009 Ø	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 (B/C) in BPS-16 on regular basis with
			N OF TT/STT	TO SST (Bio	(Chem) BPS-1	6 ON REGULAR	immediate effect. BASIS
25%	Initial	f Vacant Post of SS Recruitment Quota	T(Bio/Chem)			T	14
1/2%	by Pro	motion Quota			· · · · · · · · · · · · · · · · · · ·		3.5=3
4%	TT/ST	T Promotion quot	a to SST(Bio/Ch	iem)	· <u> </u>		0.5=11
Tiop	<u>osea i</u>	T/STT for Promoti	on to SST(Bio/C	hem)			0.56=1
	- <u> </u>		<u>╷╶──</u> ─		<u></u>		
S.No	Sent	Name of official	Name of School	Date of Birth	Date of 1st Appointmen t as Regular TT		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) Lakki Marwat for further, adjustment against the post of SST (Bio/Chem) BPS-16. Appointed on Acting Charge basis.
ITEN	1 NO.5	- PROMOTION	OF PST/SPST/	PSHT TO S	ST (Bio/Chem) BPS-16 ON REC	ULAR
BASI	S	f Vacant Post of S					14
		Recruitment Quoto				3	.5=3
		motion Quota	•••			10	.5=11
10004	DOTIC	DETDEUT to SST	(Bio/Chem)	· · · · · · · · · · · · · · · · · · ·	· · ·	the second s	.8=3
Pmp	sed PS	T/SPSTPSHT fo	r Promotion to S	SST(Bio/Chen	n)		03
L		· · ·					1. J. J. J.

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S.N 0	Sen	Name offici		ame of School	Date of . Dirth	Date of 1st Appointmen t as Regular PS117	Academic & Professional Qualification	Remarks
1.	417	Zakria kh	an 👘	PS Guli Khel Jettani	03/11/1977	13/10/2006	13.Sc B/C Addit B.Ed	Services are placed at the disposal of DEO Male Lokki Marwat for further adjustment for Promotion to the post of SST (B/C) in BPS-16 on regular basis with immediate effect.
•	428	Muhamm Jamil		GPS Caqoob Abad andiwah	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
-	431	Perva Kam	at i	iPS Nar Pur Dil egu Khel	ft 1 01-01-1982	A 23-04-2019	B.SC(B/C), B.Ed	Promotion OrderNo 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 N 417, as reported by DEO Male Lakki Marwat vide letter

C. <u>SST (Maths/Phy)</u> 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 40% CT/SCT Promotion quota to SST(Maths/Phy)	17.25=17
Proposed for Promotion to SST(Maths/Phy)	9.2=9
	09

S.N 0	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointmen t as Regular CT	Academic & Professional Qualificatio n	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 dispesal of DEO Male Zakki Marwat for farther adjustment for Promotion to the post of SST (Maths/Phy) in BPS- 16 on regular basis with immediate effect.

, J			7		Promotion	Order of S	ST (Deferred) of	23–	Marwat (M) 2023
	1	2.		23 Damsaz Kl (SCT)		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
		3.	10	Akbar Zama (CT)	n GMS Mash Masti Khani	15-01- 1973	19-12-2014	B.Sc+Addl CT, B.Ed M/P	with immediate effect. 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
	4		75	Abdul Hamced Khan (CT)	GHS Kotka Hayat Ullah	14-06- 1974	12-04-2017	BA+Addl Sci Subject MA, CT, B.ED	with immediate effect. 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
	5.	9	9	Muhammad Farooq (CT)	GHS Ghazni khel	26-10- 1976	07-11-2017	BSc + Addl Subject MA, CT, B.Ed	with immediate effect. 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
	6.	12	9	Imran Ali Khan (CT)	GSBAKHSSS eraiNaurang	15-04- 1985	07-11-2017	B.A +Addl + Sci Subject B.Ed	With immediate effect. 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
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
		<u>10.2</u>		PROMOTION	NOF DM/SDM	TO SST (N	Inths/Phy) BPS	-16 ON REGU	with immediate effect.
				ant 1 03t 01 351	(Maths/Phy)				23
_				n Quota			····		5.75=6
					to SST(Maths/	Phy)	······································		17.25=17
					on to SST(Maths/				01
						•			

Promotion Order of SST (Deferred) of District Lakki Murwat. (M) 2023 Date of 1st Date of Name of Academic & Name of : Appointment No Sen# Birth Professional official School Remarks as Regular Qualification DM . Services are placed at the disposal of DEO (M) Lakki Marwat Ikram Ullah 49 **GSBAKHSS** for further adjustment 14-09-BSo + Add 27-05-2014 (DM) Naurang against the post of 1984 (Phy) B.Ed SST (Mathi/Phy) 4 BPS-16. Appointed on Acting Charge hasls. 33 ITEM NO.3: PROMOTION OF TTASTT TO SST (Matha/Phy) BPS-16 ON REGULAR BASIS Total No. of Vacant Post of SST(Maths/Phy) 23 ± 25% Initial Recruitment Quota 5.75-6 4. 2. 75% by Promotion Quota 7.25=17 4% TT/STT Promotion quota to SST(Maths/Phy) 0.92=1 Proposed TT/STT for Promotion to SST(Maths/Phy) -12.22 61 Date of 1st Academic & Appointme Date of Name of Name of S.No Sen# Birth nt as official School Professional Remarks Regular Qualification ŤT -Services are placed at the disposal of DEO Male Lakki Marwat BA + Addl Muhammad for further adjustment **GHS** Zafar 24 07-10-1979 Sci Subject, 24-09-2005 Ibrahim for Promotion to the Mama Khel B.Ed 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) 25% Initial Recruitment Quota 5.75=6 75% by Promotion Quota 17.25=17 20% PST/SPSTPSHT to SST(Maths/Pby) 4.6=4 Proposed PST/SPSTPSHT for Promotion to SST(Maths/Phy) 04 Date of 1st. Date of SNo

Academic & Name of Name of Appointmen Birth official Professional School t as Regular Qualification PSHT Services are placed at the disposal of DEO Male Lakki Marwai for Ghulam GPS further adjustment for 21-12 BSc+Add Mustafa 14-06-2017. 1971 Promotion to the post of Baghban (M/P) B ED SST (Maths/Phy) in BPS-16 on regular basis with immediate effect.

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Remarks

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				S.J.			Promotion	Urdop of SH	l' (Noforred) of	Dlatriot Lokki	Marwat (M) 2023
		1	1	2.	303	Shali Alam	QPN No.5 Short Khol	03-13- 1973	14-08-2017	fiko ¥ Ádd (Phy),II.IID	Horvices are placed at the disposal of DI/O Male Lakki Marwai for further adjustment for Promotion to the post of NBT (Mathe/Phy) to NPS-16 on regular basis MUL (mmediate office).
		 		ĺ	They	ns inul Co shall be un	probation f	hr. tha 'norto	d as specified	in Rules (13)	sulvelluited Mde
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	•		•							Muhammad I Director	
•					215	9250-1	,0		Khyber l	and Secondary I Pakhtunkhwa Per	hawar
				•	Endst:	No/l'ile Copy forwarde 1. District Ed	No. 1/Promot d for information ucation Office	ulon and nece er (M) Lakki	ssary action to t Marwat	Dated Peshawa hel-	(ho <u>2</u> 223
						3. Officials C 4. Principal/H	oncerned. M Concerned	r Lakki Marv d			
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OFFICE OF THE DISTRICT EDUCATION OFFICER

MALE LAKKI MARWAT

OFFICE ORDER:

In pursuance to the Director Elementary & Secondary Education Khyber 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	Bio/Chem)		
1.	Abdul Cl. and posting	Further Place of Posting	Remarks	
••	Could Chattar Ches. Or	as SST		
2	1 9418 1821 18175 175- 1-1	GHS Adamzai	A.V.P	
	Shanced Lillah Chan Obt			
3.	LYDA OUT Azam Milata and a same	GHS Wanda Shahab Khel	A.V.P	
э.				
	GVIS Moment to a contract of the second se	GHS Top Tkhti Khel	A.V.P	
4 5	Cimar Pavao SAT CILLE TEL			
э.		GIIS Ghazni Khel	A.V.P	
	UND Kotka Mahmarata	GHSS Abdul Khel	A.V.P	
5.			· · ·	
	Ciuli Nhel Bettani	GHS Tajori No.1	A.V.P	
7.	Muhammad Jamil Detur			
	GPS Yagoob Abad Landiwah	GHSS Abba Khel	A.V.P	
	0.077			
S. 1		laths/Phy)		
	Serai Naurang	GHS Wanda Shahab Khel	AVP	
).	Damsaz Khan SCT GHS		A.V.P	
	Ghazni Khel	GHSS Masha Mansoor	AVP	
0.	Akbar Zaman CT GMS			
	Mash Masti Khanj	GHS Mandan Manjiwala	A.V.P	
1.	Abdul Hameed Khan CT			
	GHS Kotka Hayat Ullah	GHS Baist Khel	A.V.P	
2 1	Muhammad Ramon Gitt			
· • ·	Muhammad Faroog CT	GHS Pahar Khel Pacea	A.V.P	
3.	GHS Ghazni Khel		(ko ¥ 61'	
2.	Imran Ali CT	GHS Mangala	A.V.P	
<u> </u>	GHS Mama Khel Marwat		(363-64 	
4.000	Muhammad Jamshed CT	GHS Top Takhti Khel	A.V.P	
<u></u>	GMS Serai Nairang		75. ¥ . (*	
5.	Ikram Ullah DM GSBAKHSS	GHS Shakh Quli Khan	A.V.P	
·	Serai Naurang (a.c.b)		004	
6.	Muhammad Ibrahim STT	GHS Nar Muhammad Ghazni		
. [GHS Zafar Mama Khel	Khel	A.V.P	
7.	Ghulam Mustafa PSHT	GHS Ahmed Khel		
	GPS Baghban Lakki	VITS Anmed Khel	A.V.P	
	Shah Alam PSIIT			
o		GHS Wanda Zar Khan Sur	A.V.P	
I	GPS No.5 Sheri Khel	Band.		

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

TERMS AND CONDITIONS:

1. Charge report should be submitted to all concerned.

- 2. No TADa 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

Enda No. 2415-221

Dated 910 03 2023

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Com is 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.
- S. Teachers concerned.

elsle. District Education Officer

(Male) Lakki Marwat

بخدمت جناب سیکر ٹری صاحب ایلیمنٹری اینڈ سینڈری ایجو کیشن ڈیپار ٹمنٹ صوبہ خیبر پختو نخواہ پشادہ در خواست (البل) برائ والي احكامات آرور نمبر 60-9256مور خد 15 مارچ 2023 . جناب عالى! نہایت مؤدبانہ گزارش کی جاتی ہے کہ سائل مورخہ 1 دسمبر 2022 کو آرڈر نمبر 4001-3997 کے تحت PSHT سے (Bio/Chem) SST پر پر دموٹ ہونے کے احکامات صادر ہوئے۔ جس کی روشنی میں ڈسٹر کٹ ایجو کیشن آفیسر ضلع کلی مروت نے مورجہ 12 دسمبر 2022 آرڈر نمبر 37-8230 کے تحت سائل کو گور نمنٹ ہائی سکول ٹاپ تختی خیل صلع کی مروت میں Bio/Chem (BPS-16) SST کے احکامات صادر فرمائے۔ساکل نے عرصہ تقریباً 4 میں احسن طریقے سے فرائض مر انجام دیے اور دیتارہا۔ سائل کو بطور BPS 16 (Bio/Chem) BPS تخواہ بھی جاری ہوئی۔ جناب والانتثان! سائل کو معلوم ہوا کہ آرڈر نمبر 60-9256مور خد 15مارچ 2023 کو سائل کو With draw کے احكامات صأدر يوسق جناب والاشان! سائل ایک ایماندار اور فرض شاس شخصیت کا مالک ہے سائل نے پورے سروس میں افسران کو تھی قشم کی کو تاہی کا موقع نہیں دیا ہے۔ لہذا بذریعہ درخواست التجا کی جاتی ہے کہ سائل کے with draw کے نوٹیٹیکیشن واپس کرنے کے احکامات صادر فرمائي. سائل آپ کے دامت اقبال کیلئے ہمہ وقت دعا کو رہے گا۔ 21-03-2023: _____ العارض ير ويز كمال،ولد عبد الرحيم خان سكند نار اسير لائى ڈاكخاند نار مظفر خان متحصیل سرائے نورنگ ضلع کی مروت دابط نمبر :03006490687 والش اب تمبر:03059138442 JULBELA in of Pakistan Supreme Colin or Fa

mpugned)

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.

DISTRICTEDUCATION OFFICER (M) LAKKI MARWAT

O3 /2023 Dated. 9.4

Copy to the:

Endst: No.25/6-21,

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa with ref: to his No.9256-60 dated 15-03-2022

> Adypcate Supreme Coun of Pakistan

- 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

9/c

DISTRICT EDUCATION OFFICER (M) LAKKI MARWAT

對自然已 Masser G.H.S Top Takhi Kara Lakki Marwai



GOVERNMENT OF KHYBER PAKHTUNKHWA

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ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

No. SO(DARC)/E&SED/1-1/202 Dated Peshawar, the 06.07 2023

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

Hamza Khan Afridi S/O Khalii Khan Afridi (Lesa) Ser as-16

ii. Parvez Kamal S/O Abdur Rahim Khan

I am directed to refer to the subject noted above and to enclose berry letter of even No, dated 20.06.2023 alongwith minutes of the GRC meeting of 13.06.2023 wherein the GRC has decided the subject cases Moe increase terms and 54 respectively.

In view of the above, it is, therefore, reallest entrancing and in the processed in light of CRC decision and implementation processed in light of CRC decision and implementation processed in the earliest please



GOVERNMENT OF KHYBER PAKHTUNKHKY

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

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

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 Khalif Khan (late), SET BS- 15	Request for appointment under deceased son's quota. His father was appointed SET (85-16) 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 fules & policy and decided the same through a speaking order within one
54	Parveez Kamal S/o Abdur Parim 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	month. 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.

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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

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S.

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

Subject: <u>GRC DECISION REGARDING CASE (HAMZA KHAN AFRIDI AND</u> 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)

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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.

	[MINUIESO	F THE MEETI	NG OF GRIEVANCES REDRE	SSAL COM	MITTEE
	05			nted, thus the legitimate right of the applicant is not ded to the applicant".	SOUT COM	
50		Muhammad Zaheer Ahmad S/O Khawaja Muhammad	justice and reways l	pplicant says that he got 17 th position in merit lists equested to appoint him against the posts which ying vacant due to resignation of Azizullah and	DEO (M) Lakki Marwat	Regretted by the forum for lapse of s months.
51	06	Muhammad Faizan Khan S/O Hakim Khan	Appeal for The a justice and re was 1	Nawaz Ex-PST now school leader.	DEO (M) Lakki Marwat	Regretted by the forum for lapse of s months.
52	07	Fida Ullah S/O Asmat Ullah Khan	Appeal for The a justice appoin from could theref	applicant stated that when that at the time of nument of Mr. Atair Sohail, he demanded money me being next Meritorious at SI.33. however, he not paid. Now, he resigned from his post, fore, now the applicant requested for appointment.	DEO (M) Lakki Marwat	The case has been referred to DSC f consideration in the next DSC, purely a ment & policy.
53	08	Gul Faraz Khan	W.C. Mr. 386-B/20 Peshawar High Cou Bannu Bench, order dat 02.05.2023	22 The petitioner wants service regularization art, with all back benefits w.e.f 08.05.1994	DEO (M) Lakki Marwat	The case has been examined by the GRC at it is pointed out that the case is purely an Establishment matter, it is therefore, direct that AS (E) will give special hearing to the petitioner and issue speaking order.
54	09	Parveez Kamal S/O Ábdur Rahim Khan 030591.38442	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	Marwat	The case has been converted to departmen appeal by the GRC and AS (E) will g special hearing to the petitioner and is speaking orders accordingly.
55	10	Asmat Ullah Khan, PSHT	Appeal for re-instateme as PSHT	ant The applicant has requested for re-instatement as PSHT. The same had been downgraded from BS-15 to BS-14 by the concerned office.	Marwat	The Director E&SE is directed to dispose- the case within 02-weeks positively.

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SEFORE THE HO'NBLE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR

In S.A 15/10 12023

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 .

ce Triby

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 àgainst the impugned Order Dated.24/03/2023 of the Office of District Dated.24/03/2023 of

Respectfully Sheweth,

EHC day

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That the Appellant is a naturally born bona-fide citizen of Islamic Republic of Pakistan and hails from a respectable Samily.

2. That after going through mandatorily required criteria laid down for selection and appointment. Se Appellant got appointed as Primary School Teacker (BPS-12) years back

even after serving for many years the Appellant's carear is clean and clear of any sort of soot or sootage, and there has never been any complaint whatsoever even moved assess the Appellant. Certified to be ture com

Tribunal

Peshawar

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 (E)

v::kh

Bruffedfin he ture copy khtun vice Tribunal Pessaayar

Date of Presentation of App'ion Number of Words .----Copying Fee. Urgent. To:al-----/----/ Name of Soppase Date of Complete Date of Delivery of Copy.