FORM OF ORDER SHEET

Court of			
	•		
Appeal No.	110/	/2024	

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1;	2	3
1-	10/01/2024	The appeal of Mr. Khalid Latif presented today by.
		Mr. Mir Zaman Safi Advocate. It is fixed for preliminary
	 	hearing before Single Bench at Peshawar on
		Parcha Peshi is given to counsel for the appellant.
	,	By the order of Chairman
		REGISTRAR
	. •	ACASTS PRAIR

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

APPEAL NO. 1/0 /2024

KHALID LATIF

VS

EDUCATION DEPTT:

INDEX

S NO.	DOCUMENTS	ANNEXURE	PAGE
1	Memo of appeal		1- 3.
2	Affidavit	•••••	4.
3	Order and service book	A & B	5- 9.
4	Notification dated 11.07.2012	C	10- 11.
5	Order dated 26.01.2013	D	12- 13.
6	Order dated 06.02.2013	E	14- 15.
7	Retirement order	F	16.
8	Notification dated 27.09.2017	G	17.
9	Departmental appeal	H	18- 19.
10	Wakalat Nama		20.

APPELLANT

THROUGH: M

MIR ZAMAN SAFI

ADVOCATE '

Office: Room No. 6-E, 5th Floor, Rahim Medical Centre, Hashtnagri,

Peshawar. Cell: 0333-9991564

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

APPEAL NO. // O /2024

Mr. Khalid Latif, PST (BPS-12) (Rtd:),

VERSUS

- 1- The Government of Khyber Pakhtunkhwa through Secretary (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The accountant General, Khyber Pakhtunkhwa, Peshawar.
- 4- The District Education Officer (M), District Peshawar.

...... RESPONDENTS

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 FOR THE GRANT OF PRO-FORMA PROMOTION TO THE APPELLANT TO THE POST OF <u>\$PST_(BPS-14)_AND_PSHT_(BPS-15)_W.E.F_THE_DATE_WHEN</u> COLLEAGUES AND **JUNIOR COLLEAGUES OF** THE APPELLANT HAVE BEEN PROMOTED i.e. 26.01.2013 **AND** 06.02.2013 AND AGAINST NO ACTION TAKEN ON THE DEPARTMENTAL APPEAL OF APPELLANT WITHIN THE **\$TATUTORY PERIOD OF NINTY DAYS**

PRAYERS:

That on acceptance of this appeal the appellant may very kindly be granted/allowed pro-forma promotion to the post of SPST (BPS-14) and PSHT (BPS-15) w.e.f 26.01.2013 and 06.02.2013 with all consequential benefits. Any other relief which this august Tribunal deems fit that may also be awarded in favor of the appellant.

R/SHEWETH: ON FACTS:

Brief facts giving rise to the present appeal are as under:-

- That during service many colleagues and junior colleagues of the appellant were promoted to the post of SPST (BPS-14) vide order dated 26.01.2013 and as such they were subsequently promoted to the post of PSHT (BPS-15) vide order dated 06.02.2013 and as such the appellant was also in the promotion zone having the seniority but the appellant was ignored from the same benefit of promotion. Copies of the orders are attached as annexure.

 D & E.
- That the appellant time and again requested the authorities regarding his promotion to the post of SPST (BPS-14) and PSHT (BPS-15) but the authorities kept deaf ear on the repeated requests of appellant.
- That it is pertinent to mention that the respondent department had not been given any response to the requests of appellant for promotion to the post of SPST (BPS-14) and PSHT (BPS-15) and in such period the appellant had got retired from service on superannuation basis (60) years vide order dated 23.06.2015 without availing the benefit of promotion. Copy of the retirement order is attached as annexure......F.
- That on the analogy of the same the appellant also preferred departmental appeal before the respondent No.2 but no reply has been received so far. That the appellant feeling aggrieved and having no other remedy but to file the instant service appeal on the following grounds amongst the others. Copy of the departmental appeal is attached as annexure.

GROUNDS:

- A- That the inaction of the respondents by not allowing/granting pro forma promotion to the appellant to the post of SPST (BPS-14) and PSHT (BPS-15) is against the law, facts, norms of natural justice and materials on the record.
- B- That appellant has not been treated in accordance with law and rules by the respondent Department on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That the inaction of the respondents by not allowing/granting pro forma promotion to the appellant to the post of SPST (BPS-14) and PSHT (BPS-15) is based on mala fide and arbitrary intentions and as such the same is violative of the principle of natural justice.
- D- That the respondents acted in arbitrary and malafide manner by not allowing/ granting pro-forma promotion to appellant to the posts of SPST

(BPS-14) and PSHT (BPS-15) despite the fact that the appellant was the senior most employee of the respondent Department and was entitle for promotion to the post of SPST (BPS-14) and PSHT (BPS-15) on the basis of seniority-cum-fitness.

- E- That the inaction of the respondents by not allowing/granting pro-forma promotion to the appellant to the posts of SPST (BPS-14) and PSHT (BPS-15) is violative of Section-9 of the Civil Servant Act 1973 read with Rule-7 of the (Appointment, Promotion & Transfer) Rules 1989.
- F- That as per Rules and regulation the appellant is fully entitle for pro-forma promotion to the posts of SPST (BPS-14) and PSHT (BPS-15) with all consequential benefits.
- G-That the appellant is fully entitle for the grant of proforma promotion to the posts of SPST (BPS-14) and PSHT (BPS-15) on the analogy of the above mentioned order dated 27.09.2017 but the respondent are not willing to grant proforma promotion to the appellant to the above mentioned posts.
- H- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is, therefore, most humbly prayed that the appeal of the appellant may be accepted as prayed for.

Dated: 10.01.2024

APPELLANT

KALIO LATIF

THORUGH:

MIR ZAMAN SAFI ADVOCATE

CERTIFICATE:

It is certified that no other earlier appeal was filed between the parties.

DEPONENT

LIST OF BOOKS:

- 1- CONSTITUTION OF PAKISTAN, 1973.
- 2- SERVICES LAWS BOOKS.
- 3- ANY OTHER CASE LAW AS PER NEED.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

APPEAL NO._____ /2024

KHALID LATIF

VS

EDUCATION DEPTT:

AFFIDAVIT

I Mir Zaman Safi, Advocate High Court, Peshawar on the instructions and on behalf of my client do hereby solemnly affirm and declare that the contents of this service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

MIR ZAMAN SAFI,

Advocate

High Court, Peshawar

بلتعما المنطاث

OF THE DISTRICT DUCATION OF THE (HALS) PRSIAWARD

OUT IS ORDER

AGE RELAXATION

In exercise of power vested upon vide notification no SH

(xAD) W/15-78 dated 15.6.79 and the Injector of Raicetion (Schools) N. W.F.P. pelawar EndstsNo.12612-13279 dated 17.6.79, Sanction is hereby accorded to the Relaxation of upper age limit in respect of the following U/T toucher and set ble under the rules;

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OFFICE OF TE DISTRICT EDUCATION OFFICER (MALE) PESHAWAR:

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who; Khalid Latif PTC trained Govt; Primary School D. I. Kho is hereby transferred to Govt; Primary School Masho Khel on vacant PTC post. No TA/DA and transfor grant is allowed.

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(Mian Jemilud Din) District Education Officer (Male Peshawar.

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OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) PESHAW

OFFICE ORDER

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D/ appointment

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17.10.1982

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S/o Abdul Latif

Y-M-Days detail

D/ appointments

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Necessary entry to this effect may please be made in his service book and other

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District Education Officer, (Male) Peshawar.

Endst No. 8940-42/

Dated Peshawar the 24/10/1982.

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Redesigns Part	isted (BPS-16) Education Objactment by making incertary service roles or amountains the existing service roles; (sept) for the part of ATs are unjurated to BPS-15 for the control of ATs are unjurated to BPS-15 for the control of ATs are unjurated to BPS-15 for the
Redesigns Post  6. Arabics and elegists ("do") [ ud \$5.09 ].	isted (BPS-16) Education Object micht by making incessary service rotes or enwirding the existing service rotes; (rohy for he part)  All the ealphing mosts of ATs are unpreced to DPS-13 for the present he winders to the poster Arell of this explained.
Redesigns Post  6. Arablesta-Teleliers 1. "do" [ obs:09 iJS=10 EBS:12	inance, as my original processing service rules or Education Department by making incessing service rules or committing the establing service rules; It only for he most of committing the establing process of ATs are uniqueded to APS, 15 for the present he unimbents to the pustor hell of future appliances.
Redesigns Post  6. Arablesta Telefiers Unit (US-09) (A.1) (BS-14)	inance, as my or flow midding increasing service rules or Education Department by midding increasing service rules or innovations the establing service rules; (copy) for his most analysis of ATs are uniqueded to OPS-15 for the present incumbents to the poster health is future application.
Redesigns Post  6. Arablesta Teleliers   "Uo"   "US-09"   "IS-10"   "IS-14"   Teleliers   "Uo"   Teleliers   "Uo"   Teleliers   "Uo"   Teleliers   "IS-14"   Teleliers   Telel	BPS-161   Education Department by making incessary service roles or sensoring the estating service roles; teply for incincipal and incident the estating service roles; teply for incident the continued of the
Redesigns Post  6. Arabicator Telefierts ("do" ["US-09". [1]S-10. [13-7] [15-14. [14-7] [15-14. [15-14. [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.	manner as my definition of making meets by service rules on Education Department by making meets by service rules (new foothermost) and maintain the establing pervice rules (leply foothermost) and foothermost (new foothermost) foothermost (new foothermost) foothermost (new foothermost) foothermost (new foothermost) for the posterior of the posterior foothermost (new foothermost) foothermost (new foothermost (new foothermost) foothermost (new f
Redesigns   Past	(BPS-16)   Education Department by making incessary service roles or enough in the establing pervice roles of the polyment of the establing pervice roles of the polyment of the present income to the posters of the
Redesigns Post  6. Arabicator Telefierts ("do" ["US-09". [1]S-10. [13-7] [15-14. [14-7] [15-14. [15-14. [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.] [15-14.	inted (BPS-16) Education Department by making incessary service rules or innovations the establing service rules; (copy) for licensus All, the establing firsts of ATs are unjureded to DPS-15 for the present incumbents to the poster feet for future appliances.  (BIS-15)  One thirds [17/2] of the total AT, page was upperdeducibles to the first of the
Redesigns   Past	manner as my deficient by making mecasiny seyles roles on Education Department by making mecasiny seyles roles on insufficient particles of AT sage unique de los DES 15 for the present heuristenisto the poster well of this application.  (BIS-15)  One third ([17] you the loss AT, poster a upper data of DES 16 and the loss of AT sage unique application of the poster well of this application. The present is a loss of AT, poster as upper data of DES 16 and the loss of AT, thick in the best of the poster of the loss of AT, poster as upper data of DES 16 and the loss of AT, thick in the best of the loss o
Redesigns Post  6. Arabicon-Tel cliens Udo" [ 005:09	manner as my deficient by making mecasiny seyles roles on Education Department by making mecasiny seyles roles on insufficient particles of AT sage unique de los DES 15 for the present heuristenisto the poster well of this application.  (BIS-15)  One third ([17] you the loss AT, poster a upper data of DES 16 and the loss of AT sage unique application of the poster well of this application. The present is a loss of AT, poster as upper data of DES 16 and the loss of AT, thick in the best of the poster of the loss of AT, poster as upper data of DES 16 and the loss of AT, thick in the best of the loss o
Redesigns Post  6. Arabicator el chierra ( "do"   duus-09   (Arr)   (25-09   (35-12   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17   (45-17	inted (ups.16) Education Object microlisty making incessity service rules or individually included in the calcular pervice rules (reply for he post of a fact of a fac
Redesigns Past  6. Arabica-Telchern ("do" ("US-09") (A-r) ("SS-12") (DS-14") (HS-15") (Table For Telchern (Srivit) (Telchern (S	(BPS-16)   Education Department by making inecessary surface roles or enounding the estating service roles (repy) for he post of All the estating service roles (repy) for he post of All the estating service roles (repy) for he post of All the estating representation of All the post of All the estating of the estation of the estati
Redesigns Past  6. Arabicam Tel cliens "Uo" [ UUS-09 ].  (A.17) US-14:  (BS-12   US-14:  (BS-13   Netrly   Upgrade Redesign   Post  (Texcheric (Sriver)   Upgrade Redesign   Post  (BS-07   Upgrade Redesign   Post  (BS-07   Upgrade Redesign   Post	interest (BPS-16) Education Department by making inecessary service rules or enumining the establing service rules; (copy) for his post of ATS are uniquided; (copy) 15 for the present incumbents to the posters well of the incumbents of ATS are uniquided; (copy) 15 for the present incumbents to the posters well of the incumbents of the posters was unperdeduced by the inclumentary as t
Redesigns Past  6. Arabicum Teleliers Uo" US-09. (A.T) Uo" US-09. (BS-14. (BS-14. (BS-14. (BS-15. (BS-14. (BS-15. (BS-14. (BS-15. (BS-16. (BS-	interest (UPS-16) Education Department by making incersity service rules or enturing the estating service rules; (copy) for highest (annual rule) and the present incumbents to the posters are unjurated to DPS-15 for the present incumbents to the posters are unjurated to DPS-16 for the present incumbents to the posters are unjurated to DPS-16 in the artistic paint of the posters are unjurated to DPS-16 in the artistic paint of the posters of the present of the posters
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Redesigns   Past	inted (BPS-16) Education Department by making inecessity service rules or innuffing the estating pervice rules (topy) for he part of the p
Redesigns   Post	inted (ups.16) Education Department by making incessary surface rates or consumating tife existing service rates (lepty for he past)  All the existing hosts of AT sage unjuried (log PS-13 for the present incumbents to the paster with this caption cost.)  (BIS-15)  Discipling the log of the past of the past of uppredate of PS-16 and the fact of the paster of the paster of the past of the paster of the past
Redesigns   Past	interest (UPS-16) Inducation Department by making inecessary service rules on inducation, Department by making inecessary service rules on inducation, the estating pervice rules (Lepty Tooling part of the prosent inevitable photosis of AT state unique desired to TPS-13 for the present inevitable photosis of the poster twellow fullur application.)  [BIIS-15]  One: Whits: [173] you the local AT, page sea up produce of the prosent of the poster and up produce of the prosent of the poster
Redesigns   Past	manner as my deficient processing service rules or education, Object ments by making meets by service rules or enuntries, the estating service rules (teny) foothermally committees the present includes in the poster well of the poster of the
Redesigns   Past	Committee   Comm
Redesigns   Past	Constitute   Con
Redesigns Post  (d. Arable: o'Tel clients   "do"   UUS-09"   (A.T)   TES-10   "IS-10   (A.T)   Tes-10   "do"   Rebijo   (A.T)   Tes-10   "do"   Rebijo   (A.T)   Tes-10   "do"   Rebijo   (A.T)   Tes-10   "do"   Rebijo   (B.S-07   B.S-09   (B.S-08   T.H)   "IS-10   (B.S-09   T.H)   Tes-10   (B.S-12   T.H)   (B.S-14   T.H)   (B.S-14   T.H)   (B.S-15   T.H)   (B.S-16   T.H)   (B.S-17   T.H)   (B.S-18   T.H)   (B.S-18   T.H)   (B.S-19   T.H)   (B.S-10   T.H)   (B.S-10   T.H)   (B.S-10   T.H)   (B.S-10   T.H)   (B.S-11   T.H)   (B.S-12   T.H)   (B.S-12   T.H)   (B.S-13   T.H)   (B.S-14   T.H)   (B.S-15   T.H)   (B.S-16   T.H)   (B.S-17   T.H)   (B.S-18   T.H)   (B.S-	Curs.16    Education Department by making incessing service rules or enoughling the estating service rules (repy) for he post
Redesigns Past  G. Arables and et clients ("do") [ UUS-09".  [ US-10] [ UUS-15] [ UUS-15] [ UUS-15] [ UUS-15] [ UUS-15] [ UUS-16] [ UUS-	Curs-16    Education Department by making inecessary surface rates or anomaling tife estating service rates (repy) for he post
Redesigns   Past	Constitutes
Redesigns   Past	Curs-16    Education Department by making inecessary surface rates or anomaling tife estating service rates (repy) for he post
Redesigns   Past	Interest



# GOVERNMENT OF KHYBER PAKHTUNKHWA ELEMENTARY & SECONDARY EDUCATION DEPARTMENT.

Dated Peshawar the 11.07.2012

### **NOTIFICATION:**

No. So (B.S.A)/1-18/E&SE/2012: Sanction of the Khyber Pakhtunkhwa is hereby recorded to the up gradation of the posts for incentive of Higher Pay Scale to different categories/cadres of teachers in Elementary & Secondary Education Department w.e.f 01-07-2012 as per details given below:-

	Sr.	Nomenclature	T 4 !	I D	1	
	No			Existing	Now	Remarks
	INO	of Teaching		Basic Pay	A 1	
		cadre Post		Scale	Basic Pay	
					Scale	
	1	Primary	Govt:	<u>BPS-5</u>		The post of BPS-12
		School	Primary	<u>BPS-6</u>	_	accordingly 33,497 posts of
	. :	Teacher	School	BPS-7	ļ	PSTs already sanctioned in
	ŀ	(PST)		BPS-8	(BPS-12)	various pay scales are
				BPS-9		upgraded to BPS -12 for the
				BPS-10		present incumbents as well
				BPS-11		as future appointees.
	2	Senior		Newly		22,331 Posts of the existing
		Primary	i	upgraded		PSTs in serious said
-		School		redesigned		PSTs in various existing
		Teacher (Sr.		post		pay scales are upgraded to
ļ		PST)		post		BPS-14 and re-designated
		151)				as Senior PST. The posts
			"do"		(DDG 14)	will be filled in the manner
1			40		(BPS-14)	as may be prescribed by the
-						Elementary & Secondary
İ					-	Education Department by
	i					making necessary service
	į					rules or amending the
						existing services rules if any
ŀ	3	Deiman				for the post.
	3	Primary		Newly up-	,	20,804 posts of the existing
ľ		School Head		graded re-		PTSs (one post in each
ļ		Teacher		designed		Primary School) are
ı		(PSHT)		post		upgraded to BPS-15 and re-
		Í				designated as Primary
				,		School Head Teacher and
						will be filled in the manner
						as may be prescribed by the
			4			Elementary & Secondary
				] . [	-	Education Department by
	-	}	"do"	·	(BPS-15)	making necessary service
	*				. :	rules or amending the
						existing service rules if any
L						for the post.
	4	Certified	Govt:	BS-09	· · · · · · · · ·	All the existing posts of CTs
		Teacher (CT)	Middle	BS-10		are upgraded to BPS-15 for
			/High/Higher	BS-12	(BPS-15)	the present incumbents to
	ļ	!	Secondary	BS-14	`/	the post as well as future
L			School	BS-15		appointees.
	5	Senior		Newly		One thirds (1/3 rd ) of the Local
		Certificated		upgraded re-		CTs posts are upgraded to
		Teachers		designed	ĺ	BPS-14 and re-designated as
		(PSHT)		post		Senior CTs which will be
L						filled in the manner as may be
	1			<del></del>	<del></del>	as may be



100						المرابع المرابع		N.
نزند	A STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STA	· when so slife	IS-09	1	Alleine ekisilng pozzanie present incumbente in the	Crsinia upprode	6/8 No-13	
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		1 3 3.00.00	35-14 (4 :		Osenhide (1711 Briber)	or Legistra	höpgraded to BPS	
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4.			BPS-10	(DPS-12)				
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A policy shall also be devised in the framework of input/output criterial interns of qualification length of service, regularity, punctuality, results, curricular and co-curricular achievements and other performance indicators, so that the teachers do not ake this selteme for granted but work locate.

District wise school wise breakup of the posts is englosed herewith as A

SO(FR)/FD/10-22(E)/2010 Dated Posh: the

Copy is forwarded to Accountant General Khyper Pakhtunkhwa, Peshawar.

- P.S. to Secretary, ExsEdbepartment Kliyber Pakhlunkhwa, Peshawar.

  1. P.S. to Special Secretary, ExsEdbepartment Knyber Pakhtunkhwa, Peshawa.

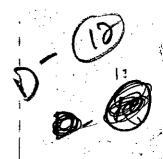
	<del> </del>		<del></del>		<u> </u>	
		"do"			(BPS-16)	prescribed by the Elementary & Secondary Education
		40			- 1	Department by making necessary service rules or
						amending the existing service
		<u> </u>	<u></u>			rules if any for the post.
6.	Arabic Teachers			BS-01		All the existing posts of ATs
	(ATs)			BS-10	(DDG 15)	are upgraded to BPS-15 for the
		"do"		BS-12 BS-14	(BPS-15)	present incumbents to the post
		l do		BS-15		as well as future appointer.
7	Senior Arabic			Newly		One third (1/3 rd ) of the Local
	Teacher (SAT)			upgraded		AT posts are upgraded to BPS-
		ļ		redesigned	(BPS-16)	16 and re-designated as Senior
	]			post		AT which will be filled in the
				•		manner as may be prescribed
	-	"do"				by the Elementary &
		l do				Secondary Education Department by making
				,		Department by making necessary service rules or
	-					amending the existing service
			-			rules if any for the post.
8	Teacher of			BS-07		All the existing posts of TTs
٠.	Theology (TT)	"do"		BS-09	, ,	are upgrade to PBS-15 for the
				BS-10 BS-12	(DDC 15)	present incumbents to the post
1				BS-12 BS-14	(BPS-15)	as well as future appointees.
			.	BS-15	, ,	
9	Senior Teacher			Newly	· · · · · · · · · · · · · · · · · · ·	One thirds (1/3 rd ) of the post
1	of Theology	,		upgrade	ł:	TT posts are upgraded to BPS-
	(STT)	"do"		redesigned	(BPS-16)	16 and re-designated as Senior
	-			post		TTs which will be filled in the
					•	manner as may be prescribed
			1			by the Elementary &
					!	Secondary Education Department by making
				· ·	**************************************	Department by making necessary service rules or
			•			amending the existing service
		·				rules if any for the post.
10	Drawing	<i>((</i> 1	•	BS-07	-	All the existing posts of DMs
	Master (DM)	"do"		BS-10	(BPS-15).	are upgraded to BPS-15 for the
				BS-12 BS-14		present incumbents to the post
	1			<u>BS-14</u>		as well as future appointees.

2. A policy shall also be devised in the framework of input/output criteria in terms of qualification, length of service, regularly, punctuality, results, curricular and co-curricular achievements and other performance indicators, so that the teachers do not like the scheme for granted but work for it.

3. District wise/school wise breakup of the posts is enclosed herewith as Annexure-A.

**SECRETARY** 

Endst: No. SO(FR)FD/10-22(E)2010 Dated Pesh: the 16/07/2012





# DISTRICT EDUCATION OFFICER (IMALE) PESHAWAR.

### OFFICE ORDER:

Consequent upon the recommendation of Departmental Promotion Committee meeting held on 16/1/2013. AND PURSUANCE OF THE Govt: of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No. 50 (B&A) 1-18/E&SE/2008 dated 12/10/2012 and No. 50(PE) 4-5/SSRC/Meeting/ 2012/ Teaching Cadre dated 13/11/2013 the following Primary School Teachers BPS.12 are hereby promoted to the post of Senior Primary School Teachers (SPST) BPS>14 (Rs.8000-610-26300) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with immediate effect.

			<u></u>	
S.NO.	S/L NO.	CIRCLE	NAME OF TEACHER	PRESENT POSTING
1 1	3	D/2[a]	Gul Akbar	GPS No.2 Mewra
2	4	Pedy /FI	Javed Hussan	Agriculture Calony
]	6	Mathta	Hidayət Ullah	GPS Visite Colony
4	В	Cily	Muhammad Zaman	GPS Haryan Garh
5	10	Mathéa	Khawas Khan	GPS Hazr Khawani 4
G	12	City	S. Amanullah Shah	GPS Patwar Bata
7	. 15	H/Abad	Abdul Qayyum	GPS Kolla Fool BEHENT
	17	City	Yousal Jan	Muliazal
9	18	City	Khalil Ur Rahman	GPS Sharlf Abad
10	7.0	B/Bor	Islam Shah	GPS Salthlan
11	23	O/Zai	Noor Muhammad	GPS Sheikhan Bala
12	24	C/Pura	Sher Rehman	I GPS Zlarat Koroona
13	25	Canil	Bismillah Jan	GMPS Gulozal
14	25	Caril	Muhammad Ashraf	GPS Khadra Khel
15	27	C/Purp	Almas Khan	GPS Audit Colony Pesh.
16	28	City	Fazal Manan	GPS No.1 Chamkani
17	29	City	Rahat Ullah	GPS Sarbiland Pura 1
18	31	Canti	Neik Muhammad	GMPS Alghan Colony #3
19	32	CITY	Muhammad Saeed	GMPS Shero Jang
20	35	/D/Zai	Kishwar Khan	GPS Akhoon Abad
21	36 /	CIPUra	Qamar Zaman	GPS Muslim Abad (Ramkishan)
21	/33/	City	Muhammad Said	GPS Jogain
-22	(4)	C/Pura	Sabir All Shah	GPS Ganj Mandi
	45,	Carti		GPS Wadpagga No.1
25	50	Carlt	Sadiq:Ali Ali Rehman	GPS Manakrao
26	51	City	Abdul Wakil	GMPS Kochl Abao Nasir Abad
27	. 52	Carli	<del> </del>	GPS Shah Dhand
28	53	Cantt	Inayat Ullah	GPS Audit Colony Pash.
1 20	1 22	Callit	Abdul Wakeel	GPS Irrigation Colony



- to Their adjustment order under the existing policy will be issued sapretally.
- No TA / DA is allowed for Joining his duty.
- 8. Necessary entry to tohis effect should be made in their service books.
- 3. They will give an under taking to this effect to be recorded in their service books.

Sharif Gul
District Education Officer,
(Male) Pehawar.

Endst: No. 1499-2660/ PST(M) /Promotion Dated Peshawar the 26th January, 2013

Copy for information to the :-

- 1. Accountant General Khyber Pakhtunkhwa Peshawar.
- 2. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
- 3. Sub Divisional Education Officer (Male) Peshawar with the remarks to verify THE acadmic / profisional qualification documents i.e FA / PTC or equivalent of the above named teachers from the concerned Board / Agencies before fixation salaries.
- 4. Assistant Sub Divisional Education Officer (Male) circles concerned

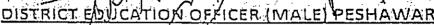
5. Officials concerned.

Deputy District ally cation Officer, (Male) Deshewar

MITED

ORDER of Sr: PST (M)



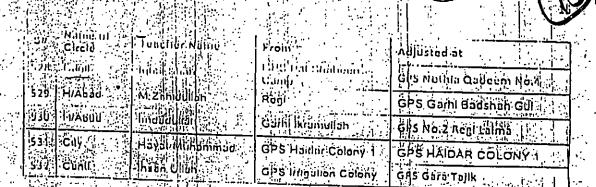


NOTIFICATION:-

σ·ố Consequent upon the recommendations of Departmental Prombtion Committee meeting held on 17/1/2013, the competent authority is pleased to promote and adjust the following Senior PST BPS.14 to BPS.15 as Primary School Head Teacher in the school noted against their names in the light of the Covic of Khyber Pakhtunkhwa Elementary and Secondary Education Department order No. 50 (B&A) 1-18/E&SE/2008 dated 12/10/2012 and No. 50(PE) 4-\$/SSRC/Meeting/ 2012/ Traching Codre dated 13/11/2013 with immediate effect in the interest of

<u>þut</u>		עייובע .		u	
S		Name of Cifcin	Toacher Name	Fröm	Adjusted at
ĿZ	1/	D/Zai	Gul Akbar	GPS No.2 Mewra	GPS No.1 Mashoo Khel
<u>/_</u>	2	H/ Abad :	Javed Hussan	Agriculture Colony	GPS Agriculture Colony
$\mathbb{L}$	I	Maihra	Hidayat Ullah	GPS Haryan Garh	GPS Haryan Garh
ــا	<u> </u>	City	Muhammad Zaman	GPS Hazr Khawani 4	GPS Kas Mera
	!	Malhra ,	Khawas Khan	GPS Patwar Bala	GPS Patwar Bala
_	1	City	Saced Ahmad	Gmps Ashrulia //.2	GPS Bazid Khel No.3
	1	City	S, Amanullan Shah	GPS Kotla Feel Banan	GPS KOTLA FEEL BANAN
<u>.</u>	4	H/Abad	Abdul Qayyum	Mullazai	GPS Muliazal
	9	City	Yousal Jan	GPS Sharif Abad	GPS No.1 Afghan Colony"
II.	10	City	Khall Ur Rahman	GPS Saithlan	GPS Garhl Fazil
IF.	11	B/Ber	Islam Shah ,	GPS Sheikhan Bala	GPS SHEIKHAN BALA
	12	D/Zai	Noor Muhammad	GPS-Ziarat Koroona	GPS Ziarat Korona
1!_	13	C/Purs .	Sher Rehman .	Gmps Gulozal	GPS Pakha Ghulam No.3
	14	Canlt	Bismillah Jan	GPS Khadra Khel	GPS Khadra Khel
	15	Canlt	Muhammad Ashraf	GPS Audit Colony Pesh.	GPS Sardar Garhl,
	16	C/Puru -	Almas Khan	GPS No.1 Chamkani	GPS No.1 Chamkani
	17	City	Fazal Manan	GPS Sarbiland Pura 1	GPS Mera Urmar Payan No.3
$\ [$	18	City	Rahat Ullah	Gmps Alghan Colony #3	GPS Mera Akka Khel Mathra
IL	19	Cantt	Naik Muhammad	Gmps Shero Jangi	GPS Batlan
	20	City	Muhammad Saeed	GPS Akhoon Abad	GPS No.4 Chamkanl 7.
	71	D/Zai	Kishwar Khan	GPS Muslim Abad (Ram Kishan)	GPS Jati Bala.3
[	22	C/Pura	Qamar Zaman	GPS Jogain	GPS Qadeem Killi
	23	City	Muhammad Said	GPS Ganj Mandi	GPS Yakatoot
1 [	. 24	C/Pura	Sabir All Shah	GPS.Wadpagga No.1	GPS Hargoni
-	25	Cantl :	Sadio Ali	GPS Manakrao	GPS KotlaMohsin Khan
  - 	26	Canll	Ali Rehman	Gmps Kochl Abad Nasir Abad	GPS Dehll Dher Badber No.2
	27	City	Abdul Wakeel 1	GPS Shall Uhand	GPS Esa Khel Hameed
	28	Caull	Inayat Ullah	GPS Audit Colony Pesh.	GPS Saller Shah
				1-6311.	<del></del>





- Muctesory unitry should but hade in their service books. Under in kinji thould be intended and partie in their service books
- Churle report should be submitted to all concerned.
- No TAZOATS STOWNER

District Education Officer (Male) Peshawar.

Endst: Nd: 3570: 4102 /AJB(PSF)

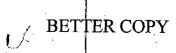
Dated Peshawar the 6 February 20130

Forwarded for information to the

- Director Elementaly and Secondary Education Khyber Pakhtunkhwa Peshawar.
- Accountanti General knyber Pakhtunkhwa Pushawar.
  Sub Divisional Eddes liph Officer (Male) Pethawar with the remarks to release the pay of above named teachers alter verification of their academic and professional qualifications from concerned boards / agencies

Ollicials concurated

PSHT Adjustmuni order(SAT)





S#	Name of circle	Teacher name	From	Adjusted at
529	H/Abad	M. Zahidullah	Regi	GPS Garhi Badshah Gul
530	H/ Abad	Imdad Ullah	Garhi	GPS No.2 Regi Lalma
			Ikramullah	
531	City	Hayat Muhammad	GPS	GPS Haidar Golony-1
			Haidar	
			Colony-1	. 1
532	Gunj	Ihsan Ullah	GPS	GPS Gara Tajik
			Irrigation	
			Colony	,

District Education Officer, (Male) Peshawar.

Endst:- No.<u>3570-4102/</u>Ajd(PSHT)

Dated Peshawar the 6th February 2013

### OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) PESHAWAR.

### RETIRMENT / ENCASHMENT,

- Under the provision of rules of 20 of the Khyber Pakhtunkhwa Govt: servants Revised leave rules 1981, sanction is hereby accorded for the grant of Encashment in lieu of LPR equal to 259-days on full pay in favour of Mr.Khalid Latif S/O Abdul Latif PST, GPS No.1 Wazir Bagh Peshawar.

He is also allowed to retire from Govt: service with effect from 28/04/2015 (A.N).

NOTE

- 1. Necessary entry to this effect should be made in his service Book
- 2. His date of Birth is 29/04/1955.

Encl:\$/Book with S.No.2

District Education Officer, (Male) Peshawar.

Endst: No. VSG

· /Dated Peshawar

/6 /2015.

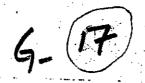
Copy forwarded for information to the:-

- 3. Accountant General Khyber Pakhtunkhwa Peshawar.
- 4. SDEO(M) Peshawar w/r to his letter No.3140,dated:04/06/2015 alongwith S/Book.

5. Official concerned.

Deputy District Education Officer (Male) Pesnawar.

ATTESTED





## OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) PESHAWAR

### NOTIFICATION

In compliance of order dated 13/09/2017 passed by the Honorable Peshawar High Court W.P. No.2757-P/2017 and in pursuance of Govt: of KPK (E&SE) Department Peshawar Notification No.50(B&A) 1-18/E&5E/2012, dated 11/07/2012, the competent authority is pleased to promote the following retired PST BPS-12 to BPS-14 as Senior Primary School Teacher in the school noted against their names with effect from 11/07/2012 in the interest of Public service.

5.No	Teacher Name	
1	Aziz ur Reiman, Rid:PST	From
2	Iftikhar Khon, Rid:PST	GPS Zargar Abad Peshawar
1	Totaliar Krain, Kraipst	GPS Mushtarzal Peshawar
	I WOUNDING ISDAM NIZOUCT	GPS Civil Quarter Peshawar

#### Note:

- 1. SDEOs(Male) Town Concerned will verify promotion order at their own level.
- 2. Necessary entry should be made in their service books.
- 3. They should give an undertaking to the effect that if any over payment is made to them as a result of Incorrect award of BPS-14, the same would be recovered from their pay, pension and graduaty

(JADDI KHAN KHALIL) District Education Officer (Male) Peshawar.

Endst No: 663

Dated 27 19./2017

Copy of the above is forwarded to the:

- 1. Deputy Registrar (Judicial) Peshawar High Court Peshawar.
- Z. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
  - 3. Accountant General Khyber Paktunkhwa Peshawar.
  - 4. 50EO (M) Town Concerned.
  - 5. ASDEO (M) Circle Concerned.
  - Official Concerned.

Dy:District Education Officer (Male) Peshawa

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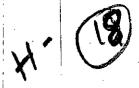
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To,

The Director,

E&SE Department,

Khyber Pakhtunkhwa Peshawar,



Subject:

PROMOTION TO THE POST OF SPST BPS-14 AND PSHT (BPS-15) WITH EFFECT FROM THE DATE WHEN COLLEAGUE AND JUNIOR COLLEGES OF THE APPELLANT HAVE BEEN PROMOTED i.e. 11.07.2012 WITH ALL BACK BENEFITS.

Respected Sir,

With due respect it is most humbly stated that the appellant was appointed as PST vide order dated 24.10.1982. That right from the date of appointment the appellant performed his duty till his retirement quite efficiently and upto the entire satisfaction of his superiors.

That during service of the appellant the Finance Division upgraded the post of PST from BPS-07 to BPS-12 and introduced Sub cadres i.e. SPST (BPS-14) and PSHT (BPS-15) and as such the education department promoted many colleagues and junior colleagues of the appellant to the posts of SPST (BPS-14) and PSHT (BPS-15).

That the appellant despite of having the requisite qualification and seniority ignored from the benefit of promotion to the post of SPST (BPS-14) and PSHT (BPS-15).

That it is pertinent to mention that the appellant got retired from service on superannuation (60) years vide order dated 23.06.2015 without availing the benefit of promotion to the posts of SPST (BPS-14) and PSHT (BPS-15).

That it is also pertinent to mention that some other colleagues have been awarded promotion to the posts of SPST (BPS-14) and subsequent promotion to the post of PSHT (BPS-15) vide orders dated 26.01.2013 and 06.02.2013.

That it is worth mentioning here that some of colleagues of the appellant have been granted pro-forma promotion to the post of SPST (BPS-14) w.e.f 11.07.2012 vide order dated 27.09.2017 on the directions of Hon'ble Peshawar High Court, Peshawar and as such they have further submitted service appeals before the august Service Tribunal, Peshawar for promotion to the post of PSHT (BPS-15) which is still pending.

That the appellant is also the similarly placed employee requested the authority concerned for his promotion to the post of SPST (BPS-14) and PSHT (BPS-15) but in vain. That the appellant feeling aggrieved preferred this departmental appeal before your good self.

It is, therefore, most humbly prayed that on acceptance of this departmental appeal the appellant may very kindly be granted pro-forma promotion to the post of SPST (BPS-14) and PSHT (BPS-15) w.e.f 11.07.2012 with all back benefits. Any other relief which your good self deems fit that may also be awarded in favor of the appellant.

Dated: 12.09.2023.

Your obediently

KHALID LATIF, EX-PST (BPS-12), GPS No.1, Wazir Bagh, Peshawar

A MARINE

### **VAKALATNAMA**

### BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

OF 2024

Khalid Latif

(APPELLANT) _(PLAINTIFF) (PETITIONER)

### **VERSUS**

Education Dept.

(RESPONDENT) _(DEFENDANT)

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Do hereby appoint and constitute MIR ZAMAN SAFI, Advocate, Peshawar to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. 09 / 01 /2024

A COURT

MIR ZAMAN SAFI

CLIEN

MUNFAT ALI ADVOCATES

OFFICE:

Room No.6-E, 5th Floor, Rahim Medical Centre, G.T Road, Hashtnagri, Peshawar. Mobile No.0333-9991564 0317-9743003