



**BEFORE THE HONOURABLE SERVICE TRIBUNAL**  
**KHYBERPAKHTUNKHWA PESHAWAR**

**Service Appeal No. 1837/2023**

**Asif Nawaz, SST. GHS Gara Budha Tank.....Appellant**

**VERSUS**

**Govt; of Khyber Pakhtunkhwa through Secretary E&SE Department & others.....Respondents.**

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(Samina Altaf)  
**DIRECTOR**

E&SE Department Khyber  
Pakhtunkhwa, Peshawar.

*20-02-2024*  
*D.I. Khan*

①



**BEFORE THE HONOURABLE SERVICE TRIBUNAL**  
**KHYBERPAKHTUNKHWA PESHAWAR**

Khyber Pakhtunkhwa  
Service Tribunal

**Service Appeal No. 1837/2023**

Diary No. 10945

Dated 1-2-2024

**Asif Nawaz, SST GHS Gara Budha Tank.....Appellant**

**VERSUS**

**Govt; of Khyber Pakhtunkhwa through Secretary E&SE Department & others.....Respondents.**

**JOINT PARAWISE COMMENTS FOR & ON BEHALF OF RESPONDENTS No: 1-3.**

**Respectfully Sheweth :-**

The Respondents submit as under: -

**PRELIMINARY OBJECTIONS**

- 1 That the Appellant has got no cause of action/locus standi to file instant appeal.
- 2 That the appellant is not an aggrieved person within the meaning of Section-4 Khyber Pakhtunkhwa Service Tribunal Act 1974 read with Article-212 of the constitution of Islamic Republic of Pakistan 1973.
- 3 That the appellant has concealed material facts from the ambit of this Honorable Tribunal.
- 4 That the appellant has not come to this Honorable Tribunal with clean hands.
- 5 That the appeal in hand is based on mala fide intentions for gaining illegal service benefits from the Department for his Antidation of promotion w.e.f 05-12-2017 against the SST in BPS-16 in violation of the Rules & policy in vogue.
- 6 That the appeal in hand is barred by law and limitation.
- 7 That the appeal in hand is bad for mis-joinder and non-joinder of the necessary parties.
- 8 That the appeal is not maintainable and incompetent in the eyes of Law in the present form.
- 9 That the appellant is not entitled for the grant of promotion to the post of SST in BPS-16 w.e.f 05-12-2017 under the Rules & Policy in vogue.
- 10 That the appellant is not also entitled for the grant of back service benefits w.e.f 05-12-2017.

②

11 That the Notification dated 15-03-2023 is legally competent & liable to be maintained in favor of the Department.

### ON FACTS

- 1) That Para-1 is relates to the service record against the CT (M) post inducted vide order dated 22-12-1999, however, he was transferred to GMS Sabir Abad in the year 2010, wherefrom, he was transferred & posted as Assistant District Sport Officer Tank on deputation vide Notification dated 04-04-2017. The appellant was also assigned the addition charge of DSO in BPS-17 vide Notification dated 08-04-2019 which are *attached as Annex-A & B*.
- 2) That Para-2 is correct to the extent of the Notification dated 02-12-2021, whereby, the appellant was repatriated to the E&SE Department against his original post of SCT in BPS-16 (P) falling at Serial No. 2 of the said Notification *attached as Annex-C*.
- 3) That Para-3 is incorrect on the grounds that vide Notification dated 04-04-2017, the appellant has got himself adjusted against the Assistant DSO in BPS-16 post on deputation in the sports Department & where against he served in the sports Department till 02-12-2021 & in the meaning time a Notification dated 05-12-2017 has been issued by the Department, whereby, the appellant was not promoted to the post of SST in BPS-16 on the grounds of his deputation in the sports Department in terms of the Notification dated 04-04-2017, where against the appellant has filed an appeal dated 03-01-2022 to the Respondent No.2 forwarded by the DEO (C) on 05-01-2022 to the Respondent no. 2 which was responded vide letter dated 17-02-2022 with the direction to the DEO (C) for considering the case of the appellant in the upcoming DPC & in compliance to the letter dated 17-02-2022, the DEO (C) has forwarded working papers for promotion to the post of SST of the appellant & finally promoted to the post of SST on 15-03-2023 by the Respondent No. 2 after due process of Law & Rules *attached as Annex-D, E, F & G*.
- 4) That Para-4 is correct to the extent of the Departmental; appeal dated 24-04-2023 against the Notification dated 22-03-2023, whereby, he has been promoted to the post of SST & adjusted by the DEO (C) vide Notification dated 22-03-2023 at GHS Gara Budha Tank, however, the said appeal dated 24-04-2023 was seen & filed under the rule by the Department which are attached as Annex-H & I, therefore, the appeal in hand is liable to be rejected on the following grounds inter alia: -

### ON GROUNDS

1. *Incorrect / not admitted.* The act of the Department with regard to the notification dated 05-12-02017 & 22-03-2023 as in accordance with the

(3)

Rules & Policy in vogue, whereas, the Notification dated 28-01-2009 of the establishment Department Govt; of KP is not applicable upon the case of the appellant being lower in scale in the Respondent Department..

2. **Incorrect and not admitted.** The stand of the appellant is illegal as he was on deputation in the Sports Department during the period when Notification dated 05-12-2017 was passed by the Department, because for promotion in the upper grade & scale one calendar year service is mandatory in the parent Department, whereas, the case of the appellant does not cover this criteria.
3. **Incorrect / not admitted.** As the Department is acted as per Law, Rules & Policy in vogue in the titled case & his correctly been promoted on 15-03-2023 by the Department in view of the service record of the appellant in the Department.  
was on dep
4. **Incorrect / not admitted.** The stand of the appellant is against the facts & law in vogue in view of fore-made submissions by the Department in the instant reply.  
fir
5. **Incorrect / not admitted.** The appellant has been treated as per Law & Rules & has not been discriminated as he not made one his case for promotion as SST in 2017 due to his deputation to the Sports department as Assistant Sport Officer in BPS-16 vide the said Notification.
6. **Incorrect / not admitted.** However the Department is also seek leave of this Honorable Tribunal to submit additional grounds, record in case law at the time of arguments on the date of hearing.
7. **Incorrect / not admitted.** As the appellant is not an aggrieved person within the meaning of Section-4 of Khyber Pakhtunkhwa Service tribunal Act, 1974 read with Article, 212 of the constitution of 1973, hence, liable to be dismissed in favor of the Department.  
M.A. No.

Fir

PRAYER.

In view of the above made submissions, it is requested that this Tribunal may very graciously be pleased to dismiss the instant service appeal with cost in favor of the Respondent Department.

Dated \_\_\_/\_\_\_/2023.

  
(Masood Ahmad)

SECRETARY

E&SE Department Khyber  
Pakhtunkhwa, Peshawar.

(Respondent No: 1).

  
(Samina Altaf)  
DIRECTOR

E&SE Department Khyber  
Pakhtunkhwa, Peshawar.

(Respondent No: 2).

SECRETARY

SECRETARY

SECRETARY

(5)

**BEFORE THE HONOURABLE SERVICE TRIBUNAL**  
**KHYBERPAKHTUNKHWA PESHAWAR**

**Service Appeal No. 1837/2023**

**Asif Nawaz, SST GHS Gara Budha Tank.....Appellant**

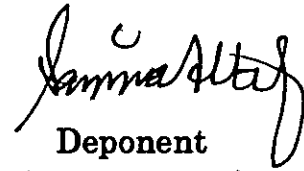
**VERSUS**

**Govt; of Khyber Pakhtunkhwa through Secretary E&SE Department & others.....Respondents**

**AFFIDAVIT**

Asif Nawaz, SST

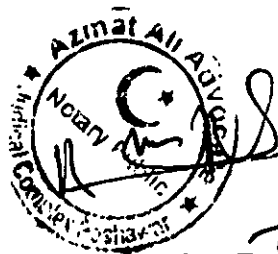
I, Samina Altaf, Director E&SE Khyber Pakhtunkhwa, do hereby solemnly affirm & declare on oath that the contents of the instant para wise Comments are true & correct to the best of my knowledge & belief. It is further stated on oath that in this appeal the answering Respondents have neither been placed Ex-Parte nor their defense has been struck off/cost.



**Deponent  
(Samina Altaf)  
DIRECTOR**

**E&SE Department Khyber  
Pakhtunkhwa, Peshawar**

**ATTESTED**



01-02-2024



GOVERNMENT OF KHYBER PAKHTUNKHWA,  
SPORTS, TOURISM, ARCHAEOLOGY, MUSEUMS & YOUTH  
AFFAIRS DEPARTMENT.

Dated Peshawar, the 4<sup>th</sup> April, 2017.

**ORDER.**

**No.SO(S)1-12/2017** The competent Authority has been pleased to requisition the services of the following officers on deputation basis initially for a period of three years and order their posting against the following vacant posts:-

S#	NAME WITH DESIGNATION	Posted as	REMARKS
1.	Mr. Zakaullah SPET (BS-16) GHSS, Butyal, Shangla	DDSO Shangla	--
2.	Mr. Asif Nawaz, CT (BPS-16) GMS, Sabir Abad, District Tank	Assistant DSO at Tank	--
3.	Mr. Siraj-Ud-Din (BPS-16), GHSS Khanpur, Dir Lower	DDSO Dir Lower	Mr. Bahadar Syed is S.C.T (BPS-16) GHSS Ziayart Talsah D (Lower) of additional charge of the post of DDSO Dir (Lower)

Secretary to Govt. of Khyber Pakhtunkhwa,  
Sports, Tourism, Archaeology, Museums & Youth Affairs Deptt

Attested  
R

Endst. No. and date even.

Copy forwarded to the:-

1. Director General, Sports & Youth Affairs, Khyber Pakhtunkhwa, Peshawar.
2. P.S to Secretary Sports & Youth Affairs, Khyber Pakhtunkhwa, Peshawar.
3. P.S to Secretary E&SE Department, Khyber Pakhtunkhwa, Peshawar.
4. Officer Concerned.

Attested  
Rasool  
ASL

Section Officer (Sports)



*Sports are essential for the development of a happy, healthy & vigorous society*

**DIRECTORATE GENERAL OF SPORTS  
KHYBER PAKHTUNKHWA**

PESHAWAR SPORTS COMPLEX, PESHAWAR CANTT.  
Ph: # 9212767, Fax # 9212766

Dated Peshawar, the 8<sup>th</sup> April, 2019

**OFFICE ORDER**

No. 17/QSC/Transfers/2017-Vol-I: The Competent Authority has been pleased to assign the additional charge of the post of District Sports Officer (BPS-17) to Mr. Asif Nawaz (BPS-16), working against the post of Assistant, District Sports Office Tank with immediate effect in addition to his own duties in the larger public interest till further order.

Mr. Raziullah, Regional Sports Officer, D.I.Khan is hereby relieved from the additional charge of the post of District Sports Officer, Tank with immediate effect.

DIRECTOR GENERAL

Copy forwarded for information to the: -

- 1- Secretary to Govt of Khyber Pakhtunkhwa, Sports and Youth Affairs Department
- 2- Deputy Commissioner, D.I.Khan.
- 3- Deputy Commissioner, Tank.
- 4- District Accounts Officers, Tank.
- 5- Regional Sports Officer, D.I.Khan.
- 6- District Sports Officer, Tank.
- 7- Budget and Accounts Officer o/o D.G. Sports Khyber Pakhtunkhwa, Peshawar.

Attested  
R

Attested  
ASW  
ASW

DIRECTOR GENERAL





Dated Peshawar the, 02.12.2021

**NOTIFICATION**

**No. SO/PEIS-2/PT/Repatriation of deputationists/2021.** The Competent Authority has been pleased to repatriate the following employees of E&SE Department who are currently posted on deputation basis in the departments as mentioned against their names and to place their services at the disposal of Concerned DEOs for further posting: -

S. No	Name & Designation of the deputationists with BPS	Name of the Departments, where posted	Placed at the disposal of
1.	Zakirullah SPET (BPS-16) GHSS Butyal Shangla.	Sports, Culture, Tourism, Archeology, Museum & Youth Affairs Department	District Education Officer (M) Shangla.
2.	Asif Nawaz SCT(BPS-16) GMS Sabir Abad Tank.	Sports, Culture, Tourism, Archeology, Museum & Youth Affairs Department	District Education Officer (M) Tank.
3.	Siraj-ud-Din SPET (BPS-16) GGHSS Khanpur Dir Lower.	Sports, Culture, Tourism, Archeology, Museum & Youth Affairs Department	District Education Officer (M) Dir Lower.
4.	Bahadar Said SCT (16) GHSS Zlarat Talash Dir Lower.	Sports, Culture, Tourism, Archeology, Museum & Youth Affairs Department	District Education Officer (M) Dir Lower.
5.	Mukhtiar Hussain DM BS-15 GMS Belanzai Dir Upper.	Sports, Culture, Tourism, Archeology, Museum & Youth Affairs Department	District Education Officer (M) Dir Upper.
6.	Khalid Zaman SPST (BS-14) OPS Nawab Khan District Mardan.	Sports, Culture, Tourism, Archeology, Museum & Youth Affairs Department	District Education Officer (M) Mardan.
7.	Muhammad Naveed SPET (BS-16) GHSS No.3 D.I Khan.	Sports, Culture, Tourism, Archeology, Museum & Youth Affairs Department	District Education Officer (M) D.I Khan.
8.	Bakht Shah Zeb SCT (BS-16) GHSS Saddo District Dir Lower.	Sports, Culture, Tourism, Archeology, Museum & Youth Affairs Department	District Education Officer (M) Dir Lower.
9.	Waseem Afzal ADEO (MC) BS-16 Office of the DEO (M) Abbottabad.	Sports, Culture, Tourism, Archeology, Museum & Youth Affairs Department	District Education Officer (M) Abbottabad.
10.	Noman Junior Clerk (BS-11) GHS Akhuntalab Bara District Khyber.	Capital Development Authority, Interior Govt. of Pakistan, Islamabad.	District Education Officer (M) Khyber.
11.	Abdul Rahmat Principal GHS Broze Chitral Lower.	Sports, Culture, Tourism, Archeology, Museum & Youth Affairs Department	District Education Officer (M) Chitral Lower.
12.	Shafqat Ulah Khan SPET BS-16 GHS Bannu.	Sports, Culture, Tourism, Archeology, Museum & Youth Affairs Department	District Education Officer (M) Bannu.
13.	Mr. Sardar Ali PET (BS-16) GMS Tanal South Waziristan.	Sports, Culture, Tourism, Archeology, Museum & Youth Affairs Department	District Education Officer (M) South Waziristan.
14.	Mr. Zahir Khan, SPET (BPS-16), GHS Pashora Battagram.	Sports, Culture, Tourism, Archeology, Museum & Youth Affairs Department	District Education Officer (M) Battagram

CS

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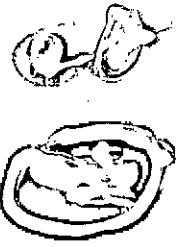
Attested  
2/12/21  
ASG

Attested  
P



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar  
Phone No. (091)-9223587

19



15.	Mst. Farah Naz, SPST (BS-14), GGPS Amandi Shah Jahan, Bannu.	Capital Metropolitan, Peshawar.	District Education Officer (M) Bannu.
16.	Mr. Kifayat Ullah Khan, Physical Supervisor (BS-16), DEO South Waziristan	Sports, Culture, Tourism, Archeology, Museum & Youth Affairs Department	District Education Officer (M) South Waziristan.
17.	Syed Muhammad Ali Sajjad, Junior Clerk (BS-11), GHS Umer Khilil Pacca D.I Khan.	Public Health Engineering Department Khyber Pakhtunkhwa.	District Education Officer (M) D.I Khan.
18.	Mr. Zaka Ullah SPET (BS-16), GHSS Butyal Shangla.	Sports, Culture, Tourism, Archeology, Museum & Youth Affairs Department	District Education Officer (M) Shangla.

The DEOs concerned are requested to insure arrival of the named employees at their respective place of duties.

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Endst. No. & Date as above.

Copy forwarded to:-

1. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar for further necessary action.
2. District Education Officers (M/F), Shangla, Tank, Dir Lower, Dir Upper, Mardan, D.I Khan, Abbottabad, Khyber, Chitral Lower, Bannu, South Waziristan and Battagram.
3. District Accounts Officers, Shangla, Tank, Dir Lower, Dir Upper, Mardan, D.I Khan, Abbottabad, Khyber, Chitral Lower, Bannu, South Waziristan and Battagram.
4. Section Officer (Estt.), Public Health Engineering Department, Khyber Pakhtunkhwa.
5. Section Officer (Estt.) Local Government Department, Khyber Pakhtunkhwa.
6. Section Officer (Estt.-III) Capital Development Authority, Ministry of Interior, Govt. of Pakistan, Islamabad.
7. PS to Secretary E&SE, Khyber Pakhtunkhwa.
8. Section Officer (Sports) Sports, Culture, Tourism, Archeology, Museum & Youth Affairs Department.
9. Master File.

Attested  
P

Attested  
R  
AS

*Hameed*  
(Mian Hussain Din)  
SECTION OFFICER (PE)  
2.12.2021



جناب ڈائریکٹر (ایگزیکٹو ایجوکیشن) خیبر پختون خواہ پشاور

بوساطت: ڈسٹرکٹ ایجوکیشن آفیسر مردانہ ٹانک

عنوان: درخواست برائے پرموشن CT سے SST (Maths/Physics)

جناب عالی:

گزارش بحضور انور ہے کہ سائل 22/12/1999 سے ڈسٹرکٹ ایجوکیشن آفس ٹانک کے زیر سایہ CT پوسٹ پر تعینات ہوا۔

1۔ کچھ عرصے بعد سائل آرڈر نمبر 33-4228 مورخہ 4 اپریل 2017 کو ڈپوٹیشن پر ڈسٹرکٹ سپورٹس آفس ٹانک چلا گیا (آرڈر کا پی ساتھ لف ہے)

2۔ سائل کی پرموشن SST (Maths/Physics) مورخہ 05/12/2017 کو DPC ہوئی لیکن ایجوکیشن ڈیپارٹمنٹ نے ڈپوٹیشن کی وجہ سے

میرے کیس کو Deffered کر دیا۔ مجھ سے جو نیگزٹیز (10-05-2006) والے نو پرموشن کر دیا گیا اور مجھ سے کئی اور جو نیگزٹیز (SST

Maths/Physics) جو کہ 24-10-2012 والے پرموشن ہو چکے ہیں۔

3۔ اب چونکہ سیکرٹری ایجوکیشن آرڈر نمبر SO(PE)5-2/IPT/2021 مورخہ 02-12-2021 کو دوبارہ ایجوکیشن ڈیپارٹمنٹ بھیج دیا گیا۔ (کاپی ساتھ

لف ہے)

4۔ اب سائل کو آرڈر نمبر 42-2434 مورخہ 10-12-2021 ڈسٹرکٹ ایجوکیشن آفیسر (مردانہ) نے سائل کو GMS صابرا آباد ٹانک میں ایڈجسٹ کر دیا

گیا اور سائل اب موجودہ سیشن (GMS صابرا آباد) میں CT پوسٹ پر کام کر رہا ہے۔ (کاپی لف ہے)

لہذا آپ صاحب سے التماس کی جاتی ہے کہ سائل کو SST (Maths/Physics) پر ترقی دے کے مشکور فرمائیں۔ سائل تاحیات دعا گورہے گا۔

Attested  
(P)

العارض

سائل آصف نواز CT گورنمنٹ مڈل سکول صابرا آباد ٹانک

Attested  
in  
ASG

ADEG/SUPD/BB&AO	
E. Br.	
Discy No	014
Date	03/07/22
[Signature]	



OFFICE OF THE DISTRICT EDUCATION  
OFFICER (MALE) TANK

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11  
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No. 113 / F.NO2-1/EB/Promotion/SST

Dated Tank the 05/01/2022

To 1

The Director,  
E&S Education Khyber Pakhtunkhwa,  
Peshawar

Subject: Appeal for Promotion of CT to SST (Math Phy:).

Memo:

Enclosed please find herewith the self explanatory original application for promotion of CT to SST Math-Phy in r/o Mr. Asif Nawaz CT GMS Sabir Abad Tank for information and further necessary action.

Attested  
P

History of the case:

1. That, the teacher concerned was appointed against the post of CT on 22-12-1999.
2. That, he was deputed to Govt. of Khyber Pakhtunkhwa Sports, Tourism, Archaeology, Museums & Youth Affairs Department as District Sports Officer vide No. 4228-33 Dated: 04-04-2017.
3. That, promotion of concerned teacher was not entertained in the Departmental Promotion Committee (DPC) held on 05-12-2017 and the case of teacher was deferred.
4. That, now the services of concerned teacher have been assigned to his parent department on 02-12-2021.
5. That, a post of SST (Math / Physics) is lying vacant in District Tank.

Attested  
Asif Nawaz  
AS

District Education Officer  
(Male) Tank



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA PESHAWAR

No. 96/SST (M)/Promotion District Tank  
Dated Peshawar the 17/02/2022  
Phone: 091-9225344  
Email: estab1@ntm1@gmail.com

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17

To: The District Education Officer  
(Male) Tank

Subject: APPEAL FOR PROMOTION OF CT TO SST

Memo: I am directed to refer to your letter No. 113 dated 05-01-2022 on the subject cited above in r/o Mr. Asif Nawaz CT, GMS Sabir Abad District Tank, and to ask you to consider the case in the upcoming meeting of Departmental Promotion Committee subject to his seniority-cum-fitness as per rules in vogue. Please

Assistant Director (Estab M-I) 17/02/2022  
Directorate E& Secondary Education  
Khyber Pakhtunkhwa, Peshawar

Endst: No. \_\_\_\_\_

Copy forwarded to the  
PA to Director Local Office.

B

Attested  
P

Assistant Director (Estab M-I)  
Directorate E& Secondary Education  
Khyber Pakhtunkhwa, Peshawar

ADLO/supdt/B&AO  
E. Bx  
547  
28.02.2022  
etw

Attested  
Rasool  
BSC

## Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

### Notification

Consequent upon the recommendation of the Departmental Promotion Committee in its meeting held on 19.01.2023 and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.SO(D&A)/I-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, AE/SAE, 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. PROMOTION TO SST (G)

##### ITEM No.1 PROMOTION OF CT MALE TO THE POST OF SST (G) BPS-16 ON REGULAR BASIS

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

Total No. of Vacant Post of SST(G)	09
25% Initial Recruitment of SST (G)	2
75% Promotion Quota of SST (G)	7
40% CT/SCT Quota to SST(G)	3.6
Posts Available for Promotion to SST (G)	4
Proposed CT/SCT for Promotion to SST (G)	4

S #	Sn #	Name of Official	Name of School	Date of Birth	Date of Apptt: as Regular CT	Qualification	Decision
1	22	Ali Gohar	GHS Maghazai	10/08/1962	6/4/1999	MA, B.Ed	Services are placed at the disposal of DEO (M) T for further adjustment against the post of SST (G) BPS-16. On Notional Basis

#### B. PROMOTION TO SST (B/C)

##### ITEM No.1 PROMOTION OF CT MALE TO THE POST OF SST (B/C) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(B/C)	2
25% Initial Recruitment of SST (B/C)	0.50
75% Promotion Quota of SST (B/C)	1.50
40% CT/SCT Quota to SST(B/C)	0.80
Posts Available for Promotion to SST (B/C)	01
Proposed CT/SCT for Promotion to SST (B/C)	1

S #	Sn #	Name of Official	Name of School	Date of Birth	Date of Apptt: as Regular CT	Qualification	Remarks
1	138	Shahzada Khan	GMS Mumraz Pathan	10-02-1989	01-03-2016	BSc, (Agriculture+Bio-Cam) B/C MSc CT B.Ed	Services are placed at the disposal of DEO (M) Tank for further adjustment against the post of SST (Bio/Chem) BPS-16. Appointed on Acting Charge basis.

Attested  
Q

Attested  
Rashid  
ASc

Promotion Order of SST (Deferred) of District Tank (M) 2023

**PROMOTION TO SST (Math/Phy)**

**ITEM No. 1 PROMOTION OF CT/SCT MALE TO THE POST OF SST (Math Phy:) BPS-16 ON REGULAR BASIS**

Total No. of Vacant Post of SST(M/P)	08
25% Initial Recruitment of SST (M/P)	2
75% Promotion Quota of SST (M/P)	6
40% CT/SCT Quota to SST(M/P)	3.2
Posts Available for Promotion to SST (M/P)	03
Proposed CT/SCT for Promotion to SST (M/P)	03

S#	Sn #	Name of Official	Name of School	Date of Birth	Date of Apptt: as Regular CT	Qualification	Remarks
1	43	Asif Nawaz Ct	GMS Sabir Abad Tank	12-03-1977	20-12-1999	BA =+ (Ad:Subject) MA B.Ed	Services are placed at the disposal of DEO Male Tank for further adjustment for Promotion to the post of SST (M/P) in BPS-16 on regular basis with immediate effect.

**ITEM No. 2 PROMOTION OF PSHT/SPST/PSTMALE TO THE POST OF SST (Math Phy :) BPS-16 ON REGULAR BASIS**

Total No. of Vacant Post of SST(M/P)	08
25% Initial Recruitment of SST (M/P)	2
75% Promotion Quota of SST (M/P)	6
20% PSHT Quota to SST (M/P)	1.60
Posts Available for Promotion to SST (M/P)	02
Proposed PSHT for Promotion to SST (M/P)	02

S#	Sn #	Name of Official	Name of School	Date of Birth	Date of Apptt: as Regular PST	Qualification	Remarks
1	138	Khan Zada	GPS Shams ul Islam	15-09-1972	29-08-1997	B.A + BSc (Ad: Subject )/MA B.Ed	Services are placed at the disposal of DEO Male Tank for further adjustment for Promotion to the post of SST (M/P) in BPS-16 on regular basis with immediate effect.
2	173	Hizb Ullah	GPS Pir Kuch	05-04-1976	18-09-2004	B.A + BSc (Ad: Subject) MA B.Ed	Services are placed at the disposal of DEO Male Tank for further adjustment for Promotion to the post of SST (M/P) in BPS-16 on regular basis with immediate effect.

**Terms and Conditions:-**

- 1 They shall be on probation for the period as specified in Rules (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.

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Promotion Order of SST (Deferred) of District Tank (M) 2023

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

Note:

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

(Hafiz Dr. Muhammad Ibrahim)

Director

Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

Endst: No. 9306-1a /File No.1/Promotion of SST (BPS-16)/2022 Dated Peshawar the 15-03-2023

Copy forwarded for information and necessary action to the: -

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

Assistant Director (Estab Male-I)  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

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2023  
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**OFFICE OF THE DISTRICT EDUCATION OFFICER  
(MALE) TANK**

**NOTIFICATION**

Consequent upon the promotion of SCT/CT, PSHT to SST (General) issued vide Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar Notification Endst. No.9306-10/F.No.1/Promotion SST (BPS-16) 2022 Dated: 15-03-2023 the following SST (Math/Phy) SST (Bio Chem) are hereby adjusted in the schools noted against each.

**SST ( Bio/Chem)**

S#	Name of Teacher	Desig:	Existing School	Posted against Vacant SST Post	Remarks
1	Shahzada Khan	CT	GMS Mumraz Pathan	GHSS Gul Imam	SST (Bio/Chem) Against V.Post

**SST ( Math/Phy)**

S#	Name of Teacher	Desig:	Existing School	Posted against Vacant SST Post	Remarks
1.	Asif Nawaz	CT	GMS Sabir Abad	GHS Gara Budha	SST (Math/Phy) Against V.Post
2	Khan Zada	PSHT	GPS Shams ul Islam	GHS Kot Hakim	SST (Math/Phy) Against V.Post
3	Hizb Ullah	PSHT	GPS Aba Khel	GHS Kiri Marwti	SST (Math/Phy) Against V.Post

**CONSEQUENTIAL ADJUSTMENT**

S#	Name of Teacher & Desig:	From	To	Remarks
1.	Mahmood Azam SST (M/P)	GHS Gara Budha	GHS Tajori	Against the vacant post of SST (M/P) for the purpose of drawl of pay, as the concerned teacher is working as ADEO (Lit:) in O/O DEO-F Tank.

**NOTE:**

1. Terms and Conditions will be same as prescribed in the above-mentioned notification.
2. No TA/DA etc is allowed.
3. Charge reports should be submitted to all concerned in duplicate.

*Attested*  
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--Sd--  
**(NISAR AHMAD)**  
District Education Officer  
(Male) Tank

Endst. No. 11778-93/F.No. 2-1/EB/Promotion/SST

Dated Tank the 22 /03/2023

Copy of the above is forwarded for information & necessary action to the:-

1. District Accounts Officer, Tank.
2. District Monitoring Officer (EMA) Tank.
3. Dy. District Education Officer (Male) Local Office.
4. Principal / Headmaster Schools Concerned.
5. Teacher Concerned.
6. Office File.

*Attested*  
*(Sd)*

*(Sd)*  
20/03/2023  
District Education Officer  
(Male) Tank

To

The Director  
Education, Khyber Pakhtunkhwa,  
Peshawar.

(17) (D)  
(D)  
(D)

Subject: **Departmental Appeal through Proper Channel**

**Respected Sir:**

1. That the present appellant was appointed as CT Teacher in Education Department, District Tank vide office dated 22.12.1999 and was posted in Govt. Centennial Model Shaheed Sher Nawaz High School, Tank. In the year 2010, the appellant was transferred to Govt. Middle School Dabara, District Tank and after three years, the appellant was transferred to Govt. Middle School Sabir Abad, Tank. The appellant performed his duties in GMS Sabir Abad till 2017, and thereafter, the appellant was posted as District Sports Officer, District Tank on deputation basis vide Notification No. 4228-33 dated 04.04.2017. Copies of appointment order, Deputation order dated 4th April, 2017 alongwith copy of order dated 8th April 2019 are annexed with the instant appeal.
2. That, the appellant was repatriated to E&SE Department vide Notification dated 02.12.2021, and the appellant was adjusted at GMS Sabir Abad Tank by respondent No. 3.
3. That the appellant was entitled for promotion to the post of SST (Physics, Maths) on 05.12.2017, but he was not promoted due to the reason that the appellant was on deputation in Khyber Pakhtunkhwa Sports, Tourism, Archaeology, Museums & Youth Affairs Department vide Notification dated 04.04.2017. But, the juniors of the appellant were promoted to the post of SST (P,M) w.e.f. 05.12.2017 and the promotion of the appellant was ordered to be kept pending. Hence, after repatriated to Education Department, the appellant submitted an application to your good-self through proper channel for promotion to the post of SST w.e.f. 05.12.2017, and vide Notification dated 15.03.2023, the appellant is promoted to the post of SST (Physics, Maths) but with immediate effect, although the appellant was entitled for promotion w.e.f. 05.12.2017 as per Khyber Pakhtunkhwa Civil Servants Promotion Policy, 2009.
4. That the appellant is entitled for promotion to the post of SST w.e.f. 05.12.2017, but the promotion case of the appellant was kept pending due to the reason that the appellant had been working in other department on deputation basis. The

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juniors of the appellant were promoted to the post of SST on 05.12.2017, hence, in such like situations; the appellant is also entitled for promotion to the post of SST w.e.f. 05.12.2017.

5. That, if the appellant is not promoted w.e.f. 05.12.2017, then the seniority of the appellant will be directly affected as the juniors of the appellant were promoted on 05.12.2017 while the appellant is promoted on 15.03.2023. Hence, the Notification dated 15.03.2023 to that is liable to be corrected.

**IT IS THEREFORE, HUMBL Y PRAYED THAT MAY PLEASE BE CORRECTED THE NOTIFICATION NO. 9306-10 DATED 15.03.2023 AND TO GRANT THE PROMOTION TO APPELLANT TO THE POST OF SST (BPS-16) W.E.F. 05.12.2017 ALONGWITH ALL BACK BENEFITS.**

Dated: 24/04/2023

**Your's Sincerely,**



Asif Nawaz S/o  
Muhammad Nawaz,  
SST, Govt. High School Gara Budha,  
District Tank.

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**DIRECTORATE ELEMENTARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA, PESHAWAR.**

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**AUTHORITY LETTER**

I, Dr. Samina Altaf, Director (E&SE) Khyber Pakhtunkhwa Peshawar do hereby authorized Mr. Behramand Khan, Assistant Director Litigation-II of this Directorate for submission of Joint Parawise Comments in **Service Appeal No. 1837/2023** case titled **Asif Nawaz, SST (BPS-16) Tank Vs Government of Khyber Pakhtunkhwa & others** fixed for hearing on 20-12-2023, hence, an authority letter is hereby issued in favor of the above-named officer.

  
(Samina Altaf)  
**DIRECTOR**

E&SE Department Khyber  
Pakhtunkhwa, Peshawar.