## BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1044/2019

Date of Institution ...

08.08.2019

Date of Decision

10.01.2022

Sajjad Khan S/o Rambel Khan, Tube Well Operator, Govt. Postgraduate College, Peshawar. (Appellant)

## <u>VERSUS</u>

Secretary to Government of Khyber Pakhtunkhwa, Higher Education Department, Peshawar and two others. (Respondents)

Muhammad Ayub Khan Shinwari, Advocate

For Appellant

Muhammad Riaz Khan Paindakheil, Assistant Advocate General

For respondents

AHMAD SULTAN TAREEN ATIQ-UR-REHMAN WAZIR

**CHAIRMAN MEMBER (EXECUTIVE)** 

## **JUDGMENT**

ATIQ-UR-REHMAN WAZIR MEMBER (E):-Brief facts of the case are that the appellant was appointed as Tube Well Operator (BPS-4) vide order dated 05-10-2000. As per notification of Provincial Government dated 13-03-1997, whereby 33% of the posts of junior clerks in the secretariat as well as in all other government departments and subordinate offices in the province shall be filled in by promotion from amongst Daftarees, Gestetner Operators, Qasids and Naib Qasids including other equivalent posts in the department, with two years service, who have passed secondary school examination and are under 45 years of age. The appellant after serving for 18 years as tube well operator with matric qualification was under legitimate expectancy that he will be promoted to the post of Junior Clerk, but respondent No. 3 was promoted vide order dated 28-03-2019

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and the appellant was ignored. Feeling aggrieved, the appellant filed departmental appeal, which was not responded, hence the instant service appeal with prayers that the impugned order dated 28-03-2019 may be set aside to the extent of promotion of respondent No. 3 and the respondents may be directed to promote the appellant to the post of junior clerk with all back benefits.

- O2. Learned counsel for the appellant has contended that the treatment meted out to the appellant is against law, facts and norms of natural justice, hence calling interference of this Tribunal; that the appellant has not been treated in accordance with law, hence his rights secured under the constitution has badly been violated; that the appellant was fully qualified for further promotion to the post of Junior Clerk, hence the appellant has vested right of promotion to the post of Junior Clerk; that the appellant has been given discriminatory treatment as respondents No 3, who is junior to the appellant has been promoted to the post of Junior Clerk, whereas the appellant has been deprived of the same, which is post warranted under law.
- 03. Learned Assistant Advocate General for the respondents has contended that the appellant was eligible to be promoted to the post of Junior Clerk and he was considered accordingly in DPC meeting, but his case was deferred due to non-availability of his PER and service book; that the appellant will be considered for promotion in the next DPC after provision of the relevant PER and his Service Book.
- 04. We have heard learned counsel for the parties and have perused the record.
- 05. It is undisputed that the appellant is eligible for promotion to the post of junior clerk. It is also undisputed that the appellant case for promotion was considered in DPC meeting but his case was deferred for want of some deficiencies. It was also conceded by representative of the respondents that the

appellant will be promoted in the next DPC upon availability of his PER and service book.

06. In view of the foregoing, the instant appeal is accepted with direction to respondents to promote the appellant to the post of Junior Clerk in the forthcoming DPC. Parties are left to bear their own costs. File be consigned to record room.

ANNOUNCED 10.01.2022

> (AHMAD SULTAN TAREBN) CHAIRMAN

(ATIQ-UR-REHMAN WAZIR) MEMBER (E)

## **ORDER** 10.01.2022

Learned counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakheil, Assistant Advocate General for the respondents present. Arguments heard and record perused.

Vide our detailed judgment of today, separately placed on file, the instant appeal is accepted with direction to respondents to promote the appellant to the post of junior clerk in the forthcoming DPC. Parties are left to bear their own costs. File be consigned to record room.

**ANNOUNCED** 10.01.2022

**CHAIRMAN** 

(ATIQ-UR-REHMAN WAZIR)

MEMBER (E)

28.06.2021

Appellant in person and Mr. Muhammad Adeel Butt, Addl. AG for the respondents present.

The Worthy Chairman is on leave, therefore, the Bench is incomplete. To come up for arguments on 27.09.2021 before the D.B.

(Rozina Rehman Member(J)

27-9-21

DB is on Tous case to come up

For the Same on Dated, 10-1-22

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Appellant Sajjed Khan in person, Addl. AG for respondents No. 1 & 2 and Syed Shafiullah Bacha, husband of respondent No. 3, on behalf of respondent No. 3 present.

Reply to the appeal has been submitted on behalf of respondent No. 3, which is placed on record. To come up for arguments before the D.B on 29.12.2020. The appellant may furnish rejoinder, within one month, if so advised.

The respondent No. 3 has submitted an application with the prayer for nominating a counsel to represent her in this case. It is mentioned in the application that she is not in a position to engage a counsel for her representation. The application is shared with learned Addl. AG who graciously undertakes to use his good office for the needful onl next date.

Chairman

Reader

29.12.2020 Due to summer vacation, case is adjourned to 31.03.2021 for the same as before.

31.03.2021 Appellant in person present.

Kabir Ullah Khattak learned Additional Advocate General alongwith Jehanzeb Superintendent for respondents present.

Due to general strike on the call of Khyber Pakhtunkhwa Bar Council, instant case is adjourned to 28 / 6/2021 for arguments before D.B.

(Atiq ur Rehman Wazir) Member (E)

(Rozina Rehman) Member (J) 16.04.2020

Due to public holiday on account of COVID-19, the case is adjourned to 13.07.2020 for the same. To come up for the same as before S.B.

Reader

13.07.2020

Appellant in person and Addl: AG alongwith Mr.

Jehanzeb, Supdt for respondents present.

Written reply on behalf of respondents not submitted. Notices be issued to the respondents 3 for submission of written reply/comments. Last opportunity granted to them.

Adjourned to 14.09.2020 before S.B.

(Mian Muhammad)

14.09.2020

Counsel for the petitioner and Addl. AG for respondents No. 1 & 2 and Syed Safiullah husband of respondent No. 3 present.

Later requests for time to submit reply/comments as respondent No. 3 did not receive any copy of appeal alongwith the notice. Adjourned to 08.10.2020 on which date the reply shall be submitted without fail.

Chairman

18.12.2019

Appellant in person and Addl. AG for the respondents present.

Learned AAG requests for time to furnish the requisite reply/comments. Adjourned to 30.01.2020 on which date the reply/comments shall positively be submitted.

Chairman

30.01.2020

Appellant in person present. Written reply not submitted. Muhammad Israr Litigation Assistant, representative of respondent department present and seeks time to furnish written reply/comments. Granted. To come up for written reply/comments on 09.03.2020 before S.B.

Member -

09.03.2020

Appellant in person and Mr. Kabirullah Khattak, Additional AG alongwith Mr. Khalid Khan, Superintendent on behalf official respondents No. 1 & 2 present. Representative of respondents No. 1 & 2 seeks further time to furnish written reply/comments. None present on behalf of private respondent No. 3, therefore, notice be issued to him for attendance and written reply. To come up for written reply/comments on 16.04.2020 before S.B.

(MUHAMMAD AMIN KHAN KUNDI) MEMBER Counsel for the appellant present.

Contends that the appellant was appointed as Tube Well Operator (BPS-4) on 05.10.2000, however, was not considered for promotion to the post of Junior Clerk BPS-11 despite government notification dated 13.03.1997. On the other hand, respondent No. 3, whose date of appointment is 13.10.2006 as reflected in the seniority list circulated on 22.03.2019, was promoted as Junior Clerk through impugned office order dated 28.03.2019. The appellant was thus discriminated, besides, the relevant policy was also violated by the respondents.

In view of available record and arguments of learned counsel, instant appeal is admitted for regular hearing subject to all just exceptions. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 05.11.2019 before S.B.

Appellant Deposited
Security & Process Fee

Chairmań

05.11.2019

Appellant in person and Addl. AG alongwith Abid Junior Clerk for the respondents present.

Representative of respondents seeks time to furnish reply/comments. Adjourned to 18.12.2019 on which date the requisite reply/comments shall positively be submitted.

Chairman

# Form- A FORM OF ORDER SHEET

	Case No	1044/2019
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	08/08/2019	The appeal of Mr. Sajjad Khan presented today by Mr. Muhammad Ayub Khan Shinwari Advocate may be entered in the Institution Register
2-	16108119	and put up to the Worthy Chairman for proper order please.  REGISTRAR  This case is entrusted to S. Bench for preliminary hearing to be put up there on 06/09/19
		CHAIŘMAN
	·	

## IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No 1044 /2019

Sajjad Khan

.Appellant

versus

Secty to Govt of KP through Secty Higher Edu Deptt and others ......Respondents

## INDEX

S. No	Description of Document	Dated	Annex	Pg
<u> </u>				No
1.	Service Appeal and affidavit			1 4
2	Copy of Academic Degrees		A	- 1-7
3	Copy of Notification	•	В	17
4.	Copy of seniority list		C	0-1
5.	Copy of impugned office order		A	1/ 13
5.	Copy of Departmental Appeal		F	111
	walalet renner			-,;-
		/		

Dated: **8**/08/2019

Appellant,

Through

Muhammad Ayub Kala Shinwa

Advocate Peshawar

Chamber:

7-A, Haroon Mansion, Khyber Bazar, Peshawar.

Cell No 03219068514

## In The Khyber Pakhtunkhwa Service Tribunal, Peshawar

Kihyber Pakhtukhwa Service Tribungi

Diary No. 116

Dated 08/8/

Service Appeal No

1044 12019

Sajjad Khan S/o Rambel Khan, Tube Well Oerator, Govt Postgraduate College, Nowshera

....Appellant

## Versus

- 1. Secretary to Government of Khyber Pakhtunkhwa, Higher Education Department, Peshawar.
- 2. Director Higher Education, Khyber Pakhtunkhwa, Peshawar.
- 3. Hafsa, Junior Clerk, Govt Girls Degree College, Pabbi, Nowshera

....Respondents

Fledto-day
Regist

Service Appeal Under Section 4 of Khyber Pakhtunkhwa Service Tribunal Act, 1974 against office order dated 28-03-2019.

Respectfully Sheweth,

Brief but relevant facts of the case are as follows:

- 1. That the appellant was appointed as Tube Well Operator (BPS-04) on 05-10-2000 in the respondent Department and has qualified Matric.
- 2. That ever since his appointment, the Appellant has performed his duties to the entire satisfaction of his superiors.
- 3. That the Government of Khyber Pakhtunkhwa erstwhile N.W.F.P issued a Notification dated 13<sup>th</sup> March, 1997 whereby 33% of the posts of Junior Clerks in the Secretariats as well as in all other Government Departments and subordinate offices in the Province shall be filled by promotion from amongst Daftarees, Gestetner Operators, Qasids and Naib Qasids including other equivalent posts in the Department, with two years service, who have

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passed Secondary School Examination and are under 45 years of age. (Copy of Academic Degree and Notification is attached as **Annex-A** & **B**)

- 4. That the Appellant has served the Department for more than 18 years as Tube Well Operator and has qualified the Matric, thus fulfills the aforementioned criteria for promotion to the post of Junior Clerk.
- 5. That the appellant being senior was under legitimate expectancy that he will be promoted to the post of junior clerk under the aforesaid criteria but to his utter surprise, respondent No 3 who is junior than the appellant has been promoted to the post of junior clerk vide impugned office order dated 28-03-2019 and the appellant has been ignored. (Copy of seniority list and Office Order is attached as **Annex-C & D**)
- 6. That the Appellant filed Departmental Appeal against the aforesaid order which has not been decided yet. (Copy of Departmental Appeal is attached as Annex-E).

The statutory time for deciding the same has lapsed, hence this service appeal on the following amongst other grounds:

## Grounds:

- a. That the treatment met to the Appellant is against the law, illegal, unlawful and without lawful authority, hence calling interference of this learned Tribunal.
- b. That the treatment met to the Appellant is not only against the settled principles of administrative law but also the same is against the fundamental rights enshrined and protected under the Constitution of Islamic Republic of Pakistan, 1973.
- c. That as per Government of Khyber Pakhtunkhwa erstwhile N.W.F.P Notification dated 13<sup>th</sup> March, 1997, 33% of the posts of Junior Clerks in the Secretariats as well as in all other Government Departments and subordinate offices in the Province shall be filled by promotion from amongst Daftarees, Gestetner Operators, Qasids and Naib Qasids including other equivalent posts in the Department, with two years service, who have passed Secondary School Examination and are under 45 years of age. The Appellant has served the Department for more than 18 years as Tube Well Operator and has qualified the Matric, thus fulfilling the aforementioned criteria for promotion to the post of Junior Clerk, hence the Appellant has a vested right of promotion to the post of Junior Clerk.
- d. That the Appellant has been given discriminatory treatment as respondent No 3 who is junior than the appellant has been promoted to the post of

Junior Clerk whereas the appellant has been deprived from the same, which is not warranted under law.

- e. That the appellant has not been treated in accordance with the law, rules and policy on the subject matter which is his inalienable right.
- f. That the treatment met to the Appellant is based on discrimination and against the principles of natural justice and the dictums of superior Courts.
- g. That the Appellant craves permission of this Honorable Court to rely on other grounds at the time of arguments and produce any additional document if required in support of his Petition.

It is, therefore, prayed that on acceptance of this Service Appeal:

- i. the impugned office order dated 28-03-2019 to the extent of promotion of the respondent No 3 be declared as against the law illegal, unlawful, without lawful authority and ineffective upon the rights of appellant; and
- ii. the respondents may kindly be directed to promote the Appellant to the post of Junior Clerk with all back benefits; and
- iii. Any other relief deemed appropriate by this Honorable Tribunal in the circumstances of the case which has not been prayed for, may graciously be granted.

Through

Muhammad Ayub Kuan Shin

Advocate Peshawar.

## IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

	Service Appeal No	/2019	
Sajjad Khan			Appellant
	versus		
Secty to Govt of K	P through Secty Higher Edu De	eptt and others	Respondents

## Affidavit

PESHANIP

I, Sajjad Khan S/o Rambel Khan, Tube Well Oerator, Govt Postgraduate College, Nowshera do hereby solemnly affirm and declare on oath that the contents of the instant Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Tribunal.

Deponent

Annox &

GOVERNIENT OF MORTH-VEST PROUTER PROVINCE SERVICES & GENERAL ADMINISTRATION DEPARTMEN

REGULATION WING ')

MOTIFICATION

Dated Peshawar, the 13th March, 1997

in sub-rulo(2) of rule 3 of the Worth-West Frontier Province Civil Survents (Appointment, Promotion and Transfer) Rules, 1989, the Services, and General Administration Department, in consults. In with Finance Department, hereby directs that in this Department Motification No. SOR-I(SaGAD)4-7/80(A) dated 21.12.1982, the following further amendments shall be made, namely:-

## AMENDMENTS

In the Appendix, for the ontries in column. 5, against serial No.9, the following whall be substituted, peroly:..

- operators, Rasids and Naib Rasids including other equivalent posts in the Department, with two years and are under 45 years of age; and
- b) 67% by initial recruitment...

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CHIEF SECRETARY TO GCVETMMENT OF NWFP.

Conted. P/2.

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GOVERNMENT OF NORTH WEST FRONTIER PROVINCE SERVICES & GENERAL ADMINISTRATION DEPARTMENT (REGULATION WING)

## **NOTIFICATION**

Dated Peshawar, the 13th March, 1997

No.SOR-IV(S&GAD) 1-1/95(3):- In pursuance of the provisions contained in sub-rule (2) of rule 3 of the North-West Frontier Province Civil servants (Appointment, Promotion and transfer) Rules, 1989, the services and General Administration Department, in consultation with Finance Department, hereby directs that in this Department Notification No. SOR-I(S&GAD)4-7/80(A) dated 21.12.1982, the following further amendments shall be made, namely:-

### Amendments

In the Appendix, for the entries in column 5, against serial No.9, the following shal be substituted, namely.

- a) 33% by promotion from amongst Daftari Gestetner Operators, Qasids and Naib Qasids including other equivalent posts in the Department, with two years service, who have passed secondary school Examination and are under 45 years of age: and
- b) 67% by initial recruitment.

Chief Secretary To Government of NWFP.

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Endst No. SOR-IV (S&GAD)1-1/95/(b) Dated Peshawar the: 13.03.1997

## Copy forwarded to:-

- 1. All Administrative Secretaries to Govt of NWFP.
- 2. Secretary to Governor NWFP.
- 3. Secretary to Chief Minister, NWFP.
- 4. All Commissioner in NWFP.
- 5. Inspector General of Police NWFP.
- 6. All Heads of Autonomous/ Semi Autonomous Bodies
- 7. All Heads of attached Department in NWFP.
- 8. All Deputy Commissioner/ Political Agent in NWFP
- 9. Dy: Registrar, Peshawar High Court, Peshawar
- 10. All District and Sessions judge in NWFP
- 11. The Secretary NWFP Public Service Commission.
- 12. The Director, Anti Corruption NWFP.
- 13. The Secretary Board of Revenue NWFP, Peshawar
- 14. The Registrar, NWFP Service Tribunal Peshawar.

Section Officer (Regulation-Iv). S&GAD

Endst No. SOR-IV (S&GAD)1-1/95/(b) Dated Peshawar the: 13.03.1997 Copy forwarded to:-

- 1. The Accountant officer of NWFP Peshawar
- 2. All Divisions/ Agency Account officer NWFP.

Section Office (Regulation-Iv). S&GAD

Endst No. SOR-IV (S&GAD)1-1/95/(b) Dated Peshawar the: 13.03.1997 Copy forwarded to:-

- 1. The Director Secretariat Staff Training
- 2. All Additional Superintendents in S&GAD.
- 3. All Deputy Secretaries in S&GAD.
- 4. All Section Officer/ Estate Officer in S&GAD.
- 5. Private Secretary to S&AGD
- 6. Private Secretary to District Attorney
- 7. Assistant Secretary Benevolent Fund college S&GAD.
- 8. Librarian S&GAD.
- 9. Javed Khan Khalil president All Class-Iv Employees Association, Civil Secretariat Peshawar.

Section Officer (Regulation-Iv).

S&GAD

W. IED

## OFFICE OF THE PRINCIPAL

PROVISION OF UPDATED/VALID SENIORITY LIST OF CLASS-IV DISTRICT NOWSHERA

Reference your letter No. 5256-73/CA-VII/Estt: Branch/A-167/Promotion Class-IV Dated Peshawar the 25 / 02 / 2019, on the subject cited above, the requisite information in the format given below regarding the fresh/ updated and valid seniority list of all those class-IV employees who have SSC (Matric) qualification is submitted for further necessary action please.

GOVT. POSTGRADUATE COLLEGE NOWSHERA									
S. No	Name	Designation	Qualification	Date of Passing SSC	Date of Birth	Date of appointment			
1.	Sajjad Khan	Tubewell Operator	Matric	1994	10-09-1974	05-10-2000			
2.	Sarwar Khan	. Mali	Matric	1990	20-05-1972	01-01-2010			
3.	Izhar Wahid	Lab: Attendant	Matric	2010	10-04-1993	16-05-2013			
4.	Tilawat Khan	Lab: Attendant	Matric	1995	17-07-1978	17-02-2014			
5.	Ishfaq Khan	Lab: Attendant	FA	2003	10-01-1987	17-02-2014			
GOVT. DEGREE COLLEGE AKORA KHATTAK									
6.	Tehseen ullah	Naib Qasid	Matric	1987	01-07-1969	07-05-2008			
7.	Muhammad Rehan	Naib Qasid	BS(4Years)	2001	12-03-1985	01-07-2016			
8.	Afsar Ali	Behishti	BA	1997	05-10-1980	01-07-2017			
	GOVT. DEGREE COLLEGE AKBARPURA								
9.	Zahoor Ullah	Nil	SSC	2013	01/04/1983	10/07/2017			
10.	Mohsin Khan	Nil	SSC	2013	17/03/1997	10/07/2017			
11.	Insiram ul haq	Nil	B.A	2018	22/01/1995	10/07/2017			
12.	Mursalin Khan	Nil	F.A	1999	03/02/1983	10/07/2017			
13.	Malik Irfan Khan	Nil	SSC	1994	09/02/1976	/11/07/2017			
 14.	Syed Ubaid Ullah Shah	Nil ·	SSC	2013	04/12/1993	10/07/2017			
15.	Tahir Mehmood	Nil	SSC	2008	12/08/1990	10/07/2017			







		GOVT. GIRLS DEGI	REE COLLEGE I	NOWSHERA C	ANTT	
16.	Shah Nazar	Chowkidar	Matric	1986	14-07-1969	07-12-199
17.	IrshadUlHaq	Naib Qasid	FA	1986	22-10-1966	04-12-200
18.	Sohaila	Lab: Attendant	BA/PTC	1992	25-10-1973	08-10-2009
19.	ShahidHussain	Chowkidar	Matric	2006	05-12-1988	30-04-2010
20.	Nawaz Muhammad	Chowkidar	FA	2013	03-03-1990	30-04-201(
21.	NajmaGul	Bearer	FA	2015	04-04-1982	22-02-2014
22.	AsiyaHabib	Lab:Attendant	Matric	2010	30-06-1980	26-12-2018
· ·		GOVT. GIRLS	S DEGREE COL	LEGE PABBI	<u> </u>	<u> </u>
23.	Rahat Ali	Mali	Matric	2002	01-01-1980	12-10-2006
24.	Hafsa	Lab: Attendant	F.A	1999	15-04-1981	13-10-2006
25.	Iram Khattak	Lab: Attendant	B.Ls	1998	15-03-1982	13-10-2006
26.	Zahida	Lab: Attendant	B.A	1999	27-02-1982	14-10-2006
27.	Zahoor Ul Haq	Naib Qasid	M.A	2000	30-11-1982	14-10-2006
28.	Riaz Ahmad	T.W.O	Matric	1990	11-03-1969	19-10-2009
29.	Niaz Ali Khan	Hostel Bearer	FA	1986	09-04-1969	19-10-2009
30.	Rajid Ali	Chowkidar *	FA	2004	04-05-1986	19-10-2009
31.	Mubarak Ali	Cook	Matric	1997	13-11-1980	31-03-2012
32.	Syed Amir Shahzad	Chowkidar	Matric	2002	18-12-1986	25-09-2017
		GOVT. GIRLS I	DEGREE COLLE	EGE PIRPIAI		
33.	M. Saddiq	Naib Qasid	FA	2009	9-4-92	19-11-14
		GOVT. HOME EC	ONOMICS COL	LEGE PIRPIAI	<u> </u>	
34.	Saeeda Kausar	Lab: Attendant	ВА	1996	15-4-1977	18-2-2016
35.	Hazrat Ali	Naib Qasid	BA	1994	14-3-78	18-2-16
36.	Faqeer Hussain	Mali	FA	1994	3-3-76	¥_ <b>Q</b> -2-16



37.	Safia Begum	Lab: Attendant	Matric	1998	9-3-1978	20-2 - 2016
38.	Haqramin Zara	Lab: Attendant	ВА	2001	22-4-1980	20-2 - 2016
39.	Sultan Zeb	Chowkidar	Matric	2003	4-4-1983	20-2-2016
40.	Aurang Zeb	Naib Qasid	FA	2004	8-1-1984	20-2 - 2016
41.	Muhammad Ishtiqa	Naib Qasid	BA with IT	2003	6-4-1987	20-2-2016
42.	Aneela	Lab: Attendant	МА	2006	28-12-1989	20-2 - 2016
43.	Tabassum Begum	Lab: Attendant	Matric	2001	15-4-1984	25-2-2016
44.	Nadia Begum	Lab: Attendant	FA	2001	21-11-1982	2-12-2016
45.	Qamar Jahan	Sweeper	MA (P/Sci)	2001	19-8-1984	23-9-2017
46.	Fakhr-e-Alam	Naiq Qasid	B.Sc	2007	15-4-1991	23-9-2017
47.	Asim ud Din	Chowkidar	FA	2010	4-5-1992	23-9-2017
48.	Fahad Zakria	Chowkidar	Matric	2014	17-7-1993	23-9-2017

Principal
Govt. Postgraduate College
Nowshera







# DIRECTORATE OF HIGHER EDUCATION KHYBER PAKHTUNKHWA KHYBER ROAD, PESHAWAR

Tel # 091-9210242 / 9211025

Fax # 091-9211803

E-mail:- dhekpkpesh@gmail.com Facebook.com/dhekppeshawar Twitter.com/dhekppeshawar1

Dated Peshawar the 28/3 2019

## **OFFICE ORDER:**

Consequent upon the recommendations of the Departmental Promotion Committee, the Competent Authority has been pleased to promote the following matriculate Class-IVs to the Post of Junior Clerk (BPS-11) of college cadre on regular basis with immediate effect, and to post them against the station mention below.

1. Mr. Samar Gul, Water carrier, GPGC, Charsadda. 2. Sharafat Ahmad, Naib Qasid, Directorate of Higher Education, Khyber Pakhtunkhwa. 3. Asad Hussain, Naib Qasid, GDC, Pabbi (Nowshera) 4. Azeem Masih, Sweeper, GPGC Charsadda. 5. Sardar Alam, Sweeper, Directorate of Higher Education, Khyber Pakhtunkhwa 6. Ihsan Ullah, Naib Qasid, GDC Pabbi (Over Beducation, Khyber Pakhtunkhwa) 6. Ihsan Ullah, Naib Qasid, Directorate of Higher Education, Khyber Pakhtunkhwa 6. Ihsan Ullah, Naib Qasid, Directorate of Higher Education, Khyber Pakhtunkhwa 6. Ihsan Ullah, Naib Qasid, GC Peshawar 7. Johar Ali, Naib Qasid, GC Peshawar 8. Hafsa Lab Attd: GGDC Pabbi, Nowshera Pabbi (Nowshera) 8. Hafsa Lab Attd: GGDC Pabbi, Nowshera Pabbi (Nowshera) 8. MarDAN DIVISION 1. Inayat Ullah Khan Lab Attendant GDC, Kotha Swabi. 2. Noor Mehmood, Mali, GPGC, Swabi. 3. Dilawar Khan, Lab. Attendant, GDC, Govt: Degree College Chari Kapura (Mardan). 4. Bashir Ali Chowkidar, GCC, Sheikh Maltoon Mardan 6. Sajid Ullah, Lab attd: GDC Kotha, Swabi Government Degree College for A.V.P 7. Sameen Khan, Lab attd: GDC Kotha, Swabi Government Girls Degree College for A.V.P 8. Sameen Khan, Lab attd: GDC Kotha, Swabi Government Girls Degree College for A.V.P 8. Sameen Khan, Lab attd: GDC Kotha, Swabi Government Girls Degree College Kotha, Swabi A.V.P 8. Sameen Khan Lab Attendant GDC, Govt: Postgraduate College for Mardan 8. Sajid Ullah, Lab attd: GDC Kotha, Swabi Government Girls Degree College Kotha, Swabi Government Girls Degree College For A.V.P 8. Sameen Khan Lab attd: GDC Kotha, Swabi Government Girls Degree College Kotha, Swabi A.V.P 8. Sameen Khan Lab Attendant GDC, Government Girls Degree College For A.V.P 9. Bakht Amrish, Bearer, GDC, Daggar (Buner) Government Girls Degree College, A.V.P 9. Dowlat Khan Lab Attendant GDC, Government Degree College, A.V.P 9. Mingora (Swat) A.V.P 9. Mingora (Swat) A.V.P 9. Mingora (Swat) A.V.P 9. Mingora (Swat) A.V.P	Sr. #	Name & Designation	Promoted/Adjusted as Junior Clerk BPS-11 at	Remarks
2. Higher Education, Khyber Pakhtunkhwa. Zaida (Swabi) 3. Asad Hussain, Naib Qasid, GDC, Pabbi (Nowshera). Govt: Degree College Khan Kohi (Nowshera). 4. Azeem Masih, Sweeper, GPGC Charsadda. Govt: Girls Degree College Umarzai (Charsadda) 5. Sardar Alam, Sweeper, Directorate of Higher Education, Khyber Pakhtunkhwa (Govt: Girls Degree College Dabgari (Peshawar). (A.V.P) 6. Ilnsan Ullah, Naib Qasid, Directorate of Higher Education, Khyber Pakhtunkhwa (Govt: Girls Degree College Dabgari (Peshawar). (A.V.P) 7. Johar Ali, Naib Qasid, GC Peshawar (Govt: College Peshawar). (A.V.P) 8. Hafsa, Lab Attd: GGDC Pabbi, Nowshera) (Govt: Girls Degree College, Pabbi (Nowshera)) (A.V.P) 7. MARDAN DIVISION 1. Sinayat Ullah Khan Lab Attendant GDC, Kotha Swabi. (Govt: Degree College Zarobi Swabi). (Govt: Postgraduate College, Swabi). (Govt: Degree College Ghari Kapura (Mardan)) (A.V.P) 8. Dilawar Khan, Lab. Attendant, GDC, Bakhshali (Mardan). (Govt: Degree College Ghari Kapura (Mardan)) (Govt: Degree College Khair Abad (Mardan)) (Govt: Postgraduate College for Women Mardan) (Govt: Postgraduate College for Women Mardan) (Govt: Postgraduate College for Women Mardan) (Govt: Postgraduate College Khair Abad (Mardan)) (Govt: Postgraduate College for Women Mardan) (Govt: Postgraduate College Kotha, Swabi) (Government Degree College Kotha, Swabi) (Government Girls Degree College Kotha, Swabi) (Government Girls Degree College Kotha, Swabi) (Government Degree College Kotha, Swabi) (Government Degree College, Timergara) (Government Degree College, Timergara) (Government Degree College, M.V.P) (Government Degree College, M.	1.			A.V.P
4. Azeem Masih, Sweeper, GPGC Charsadda.  5. Sardar Alam, Sweeper, Directorate of Higher Education, Khyber Pakhtunkhwa 6. Ihsan Ullah, Naib Qasid, Directorate of Higher Education, Khyber Pakhtunkhwa 7. Johar Ali, Naib Qasid, GC Peshawar 8. Hafsa, Lab Attd: GGDC Pabbi, Nowshera 9. Wabii, Mardan Division 1. Inayat Ullah Khan Lab Attendant GDC, Swabi. 3. Bashir Ali Chowkidar, GCC, Sheikh Maltoon Mardan 6. Sajid Ullah, Lab attd: GDC Taktbai 6. Sajid Ullah, Lab attd: GDC Kotha, Swabi 6. Government Degree College Fabbi (Morana) 6. Hafsa, Lab Attd: GDC Kotha, Swabi 7. Johar Ali, Naib Qasid, GC Peshawar 8. Hafsa, Lab Attendant GDC, Kotha Swabi. 9. Swabi. 1. Inayat Ullah Khan Lab Attendant GDC, Kotha Swabi. 9. Swabi. 1. Swabi. Govt: Degree College Zarobi Swabi. 9. Swabi. Govt: Postgraduate College, Swabi. 9. Swabi. A.V.P 9. Swa	2.		1	A.V.P
Sardar Alam, Sweeper, Groc Charsadda.  Sardar Alam, Sweeper, Directorate of Higher Education, Khyber Pakhtunkhwa  Ihsan Ullah, Naib Qasid, Directorate of Higher Education, Khyber Pakhtunkhwa  Johar Ali, Naib Qasid, Directorate of Higher Education, Khyber Pakhtunkhwa  Johar Ali, Naib Qasid, GC Peshawar  Marcan Division  Inayat Ullah Khan Lab Attendant GDC, Kotha Swabi.  Noor Mehmood, Mali, GPGC, Swabi.  Bakhshali (Mardan).  Bashir Ali Chowkidar, GGC, Sheikh Maltoon Mardan  Mardan  Shabzed Khan, Lab attd: GDC Taktbai  Samid Ullah, Lab attd: GDC Taktbai  Samid Ullah, Lab attd: GDC Kotha, Swabi  Shabzed Khan, Lab attd: GDC Kotha, Swabi  Samid Ullah, Lab attd: GDC Kotha, Swabi  Shabzed Khan, Lab attd: GDC Kotha, Swabi  Sameen Khan, Lab attd: GDC Kotha, Swabi  Sameen Khan, Lab attd: GDC Kotha, Swabi  Malakkand Division  Malakkand Division  Misar Ahmad TWO GPGC, Timergara (DIR Lower).  Bakht Amrish, Bearer, GDC, Daggar (Buner).  Dowlat Khan Lab Attendant GDC, Government Degree College Jower (Buner)  Mower (Buner)  Dowlat Khan Lab Attendant GDC, Government Degree College Jower (Buner)  Dowlat Khan Lab Attendant GDC, Government Degree College Jower (Buner)  Dowlat Khan Lab Attendant GDC, Government Degree College Jower (Buner)  Dowlat Khan Lab Attendant GDC, Government Degree College Jower (Buner)  Dowlat Khan Lab Attendant GDC, Government Degree College, A.V.P. Mingora (Swat).  Mingora (Swat).  Muhammad Jabbar Lab Attendant GDC, Government Degree College, Mingora (Swat).	3.			A.V.P
Education, Khyber Pakhtunkhwa   Dabgari (Peshawar).   A.V.P	4.	Azeem Masih, Sweeper, GPGC Charsadda.	, -	A.V.P
6. Education, Khyber Pakhtunkhwa 7. Johar Ali, Naib Qasid, GC Peshawar 8. Hafsa, Lab Attd:. GGDC Pabbi, Nowshera 9	5.		-	, A.V.P
8. Hafsa, Lab Attd:. GGDC Pabbi, Nowshera Govt: Girls Degree College, Pabbi (Nowshera)  MARDAN DIVISION  1. Inayat Ullah Khan Lab Attendant GDC, Kotha Swabi.  2. Noor Mehmood, Mali, GPGC, Swabi.  3. Dilawar Khan, Lab. Attendant, GDC, Bakhshali (Mardan).  4. Bashir Ali Chowkidar, GGC, Sheikh Maltoon Mardan  5. Shahzed Khan, Lab attd: GDC Taktbai  6. Sajid Ullah, Lab attd: GDC Kotha, Swabi  7. Sameen Khan, Lab attd: GDC Kotha, Swabi  MALAKAND DIVISION  1. Nisar Ahmad TWO GPGC, Timergara (DIR Lower).  2. Bakht Amrish, Bearer, GDC, Daggar (Buner).  3. Dowlat Khan Lab Attendant GDC, Mingora (Swat).  4. Miser Shangla  4. Miser Shangla  4. Miser Shangla  4. Miser Shangla  4. Mingora (Swat).  Muhammad Jabbar Lab Attendant GDC, Mingora (Swat).  Mingora	6.	· · · · · · · · · · · · · · · · · · ·		A.V.P
MARDAN DIVISION  1. Inayat Ullah Khan Lab Attendant GDC, Kotha Swabi.  2. Noor Mehmood, Mali, GPGC, Swabi.  3. Dilawar Khan, Lab. Attendant, GDC, Bakhshali (Mardan).  4. Bashir Ali Chowkidar, GGC, Sheikh Maltoon Mardan  5. Shahzed Khan, Lab attd: GDC Taktbai  6. Sajid Ullah, Lab attd: GDC Kotha, Swabi  7. Sameen Khan, Lab attd: GDC Kotha, Swabi  8. Nisar Ahmad TWO GPGC, Timergara (DIR Lower).  2. Bakht Amrish, Bearer, GDC, Daggar (Buner).  3. Dowlat Khan Lab Attendant GDC, Mingora (Swat).  4. AV.P  6. Salike (Mardan).  6. Sajid Ullah, Lab attd: GDC Kotha, Swabi  6. Sajid Ullah, Lab attd: GDC Kotha, Swabi  9. Government Girls Degree College Kotha, Swabi  1. Nisar Ahmad TWO GPGC, Timergara (DIR Lower).  3. Dowlat Khan Lab Attendant GDC, Government Degree College  A.V.P  3. Dowlat Khan Lab Attendant GDC, Government Girls Degree College, Mingora (Swat).  4. Mingora (Swat).  5. Muhammad Jabbar Lab Attendant GDC, Government Degree College, Mingora (Swat).  6. Sajid Ullah, Lab attd: GDC Kotha, Swabi  7. Sameen Khan, Lab attd: GDC Kotha, Swabi  8. AV.P  8. AV.P  8. AV.P  9. AV.P  9. AV.P  1. Mingora (Swat).  9. AV.P  1. AV.P  2. Bakht Amrish, Bearer, GDC, Daggar (Buner).  3. Dowlat Khan Lab Attendant GDC, Government Degree College, Mingora (Swat).  4. Ali Rehman Lab Attendant GDC, Government Degree College, Mingora (Swat).  5. Muhammad Jabbar Lab Attendant GDC, Government Degree College, Mingora (Swat).	7.	Johar Ali, Naib Qasid, GC Peshawar	Govt: College Peshawar.	A.V.P
1. Inayat Ullah Khan Lab Attendant GDC, Kotha Swabi.  2. Noor Mehmood, Mali, GPGC, Swabi.  3. Dilawar Khan, Lab. Attendant, GDC, Bakhshali (Mardan).  4. Bashir Ali Chowkidar, GGC, Sheikh Maltoon Mardan  5. Shahzed Khan, Lab attd: GDC Taktbai  6. Sajid Ullah, Lab attd: GDC Kotha, Swabi  7. Sameen Khan, Lab attd: GDC Kotha, Swabi  MALAKAND DIVISION  1. Dowlat Khan Lab Attendant GDC, Daggar (Buner).  2. Bakht Amrish, Bearer, GDC, Daggar (Buner).  3. Dowlat Khan Lab Attendant GDC, Mingora (Swat).  4. Mingora (Swat).  5. Inayat Ullah Khan Lab Attendant GDC, More Meridan (Sovt: Postgraduate College (Swabi).  A.V.P (Sovt: Degree College Khair (Mardan).  Govt: Degree College Khair (Mardan).  A.V.P (Sovernment Degree College for Women Mardan.  Government Degree College (Sovtha, Swabi)  Government Girls Degree (College Kotha, Swabi)  Government Girls Degree (College Kotha, Swabi)  A.V.P (Sovernment Degree College (Buner))	8.	Hafsa, Lab Attd:. GGDC Pabbi, Nowshera		A.V.P
Swabi.  Noor Mehmood, Mali, GPGC, Swabi.  Dilawar Khan, Lab. Attendant, GDC, Bakhshali (Mardan).  Bashir Ali Chowkidar, GGC, Sheikh Maltoon Mardan  Shahzed Khan, Lab attd: GDC Taktbai  Sajid Ullah, Lab attd: GDC Kotha, Swabi  Sameen Khan, Lab attd: GDC Kotha, Swabi  Malakand Division  Nisar Ahmad TWO GPGC, Timergara (DIR Lower).  Bakht Amrish, Bearer, GDC, Daggar (Buner).  Dowlat Khan Lab Attendant GDC, Mingora (Swat)  A.V.P  A.V.P  A.V.P  A.V.P  Govt: Postgraduate College for Women Mardan.  Government Degree College Kotha, Svabi  Government Girls Degree College Kotha, Swabi  Government Girls Degree College Kotha, Swabi  Government Girls Degree College Kotha, Swabi  Government Girls Degree College, A.V.P  Government Girls Degree College A.V.P  Ali Rehman Lab Attendant GDC, Government Degree College, Mingora (Swat).  Muhammad Jabbar Lab Attendant GDC, Government Degree College, Mingora (Swat)	MAR	DAN DIVISION		
2. Nool Melinood, Mali, Groc, Swabi.  3. Dilawar Khan, Lab. Attendant, GDC, Bakhshali (Mardan).  4. Bashir Ali Chowkidar, GGC, Sheikh Maltoon Mardan  5. Shahzed Khan, Lab attd: GDC Taktbai  6. Sajid Ullah, Lab attd: GDC Kotha, Swabi  7. Sameen Khan, Lab attd: GDC Kotha, Swabi  Malakand Division  1. Nisar Ahmad TWO GPGC, Timergara (DIR Lower).  2. Bakht Amrish, Bearer, GDC, Daggar (Buner).  3. Dowlat Khan Lab Attendant GDC, Puran Shangla  4. Ali Rehman Lab Attendant GDC, Mingora (Swat).  Muhammad Jabbar Lab Attendant GDC, Muhammad Jabbar Lab Attendant GDC, Government Degree College, Muhammad Jabbar Lab Attendant GDC, Government Degree College, Mingora (Swat)  Malakand College, A.V.P.  Swabi.  Govt: Degree College Khair A.V.P.  Government Degree College A.V.P.  Government Girls Degree College, Mingora (Swat).  A.V.P.  A.V.P.  A.V.P.  A.V.P.  A.V.P.  A.V.P.  Government Degree College, Mingora (Swat).  A.V.P.	1.			A.V.P
Bakhshali (Mardan).  Bashir Ali Chowkidar, GGC, Sheikh Maltoon Mardan  Shahzed Khan, Lab attd: GDC Taktbai  Govt: Postgraduate College for Women Mardan.  Sajid Ullah, Lab attd: GDC Kotha, Swabi  Sameen Khan, Lab attd: GDC Kotha, Swabi  Sameen Khan, Lab attd: GDC Kotha, Swabi  MALAKAND DIVISION  Nisar Ahmad TWO GPGC, Timergara (DIR Lower).  Bakht Amrish, Bearer, GDC, Daggar (Buner).  Dowlat Khan Lab Attendant GDC, Puran Shangla  A.V.P  Government Girls Degree College, Timergara.  Government Girls Degree College, Timergara.  Government Degree College, A.V.P  Government Degree College, A.V.P  Government Degree College A.V.P  Government Degree College A.V.P  Government Degree College A.V.P  A.V.P  A.V.P  A.V.P  Government Girls Degree College A.V.P  Government Girls Degree College A.V.P  Government Girls Degree College A.V.P  Ali Rehman Lab Attendant GDC, Government Degree College, Mingora (Swat).  A.V.P  Muhammad Jabbar Lab Attendant GDC, Government Degree College, Mingora (Swat)  Muhammad Jabbar Lab Attendant GDC, Government Degree College, A.V.P	2.	Noor Mehmood, Mali, GPGC, Swabi.		A.V.P
Mardan  Abad (Mardan).  A.V.P  Shahzed Khan, Lab attd: GDC Taktbai  Govt: Postgraduate College for Women Mardan.  Government Degree College Kotha, Swabi  Sameen Khan, Lab attd: GDC Kotha, Swabi  MALAKAND DIVISION  Nisar Ahmad TWO GPGC, Timergara (DIR Lower).  Bakht Amrish, Bearer, GDC, Daggar (Buner).  Dowlat Khan Lab Attendant GDC, Puran Shangla  A.V.P  Bull Rehman Lab Attendant GDC, Mingora (Swat).  Muhammad Jabbar Lab Attendant GDC, Government Degree College, Mingora (Swat).  Malakand Mardan.  Govt: Postgraduate College Kotha, Swabi  Government Degree College, A.V.P  Government Degree College A.V.P  Government Girls Degree College Puran Shangla  A.V.P  A.V.P  Government Degree College, A.V.P  Government Degree College, A.V.P	3.	Bakhshali (Mardan).		A.V.P
Shalized Khan, Lab attd. GDC Taktbal   Women Mardan.	4.		· · · · · · · · · · · · · · · · · · ·	A.V.P
7. Sameen Khan, Lab attd: GDC Kotha, Swabi  7. Sameen Khan, Lab attd: GDC Kotha, Swabi  Government Girls Degree College Kotha, Swabi  MALAKAND DIVISION  1. Nisar Ahmad TWO GPGC, Timergara (DIR Lower).  Bakht Amrish, Bearer, GDC, Daggar (Buner).  Dowlat Khan Lab Attendant GDC, Puran Shangla  Ali Rehman Lab Attendant GDC, Mingora (Swat).  Muhammad Jabbar Lab Attendant GDC, Government Degree College, Mingora (Swat).  More Rotha, Swabi  Kotha, Swabi  Government Girls Degree College, Postgraduate College, A.V.P  Government Degree College A.V.P  A.V.P	5.	Shahzed Khan, Lab attd: GDC Taktbai	Women Mardan.	A,V.P
MALAKAND DIVISION  1. Nisar Ahmad TWO GPGC, Timergara (DIR Lower).  2. Bakht Amrish, Bearer, GDC, Daggar (Buner).  3. Dowlat Khan Lab Attendant GDC, Puran Shangla  4. Ali Rehman Lab Attendant GDC, Mingora (Swat).  MALAKAND DIVISION  College Kotha, Swabi  College Kotha, Swabi  Govt; Postgraduate College, Timergara.  Government Degree College, A.V.P  Government Girls Degree College, Mingora (Swat)  Government Degree College, Mingora (Swat)  A.V.P	6.	Sajid Ullah, Lab attd: GDC Kotha, Swabi	Kotha, Swabi	A.V.P
1. Nisar Ahmad TWO GPGC, Timergara (DIR Lower).  2. Bakht Amrish, Bearer, GDC, Daggar (Buner).  3. Dowlat Khan Lab Attendant GDC, Puran Shangla  4. Ali Rehman Lab Attendant GDC, Mingora (Swat).  5. Muhammad Jabbar Lab Attendant GDC, Government Degree College, Mingora (Swat)  6. A.V.P  6. A.V.P  6. Government Degree College, Mingora (Swat)  6. Government Degree College, Mingora (Swat)  7. A.V.P	7.	Sameen Khan, Lab attd: GDC Kotha, Swabi		A.V.P
Lower).  Day Bakht Amrish, Bearer, GDC, Daggar (Buner).  Dowlat Khan Lab Attendant GDC, Puran Shangla  Ali Rehman Lab Attendant GDC, Mingora (Swat).  Muhammad Jabbar Lab Attendant GDC, Government Degree College, Mingora (Swat)  Timergara.  Government Degree College A.V.P  Government Degree College, Mingora (Swat)  Government Degree College, A.V.P	MAL	AKAND DIVISION		
2. Bakht Amrish, Bearer, GDC, Daggar (Buner). Government Degree College Jower (Buner)  3. Dowlat Khan Lab Attendant GDC, Puran Shangla  4. Ali Rehman Lab Attendant GDC, Mingora (Swat).  5. Muhammad Jabbar Lab Attendant GDC, Government Degree College, Mingora (Swat)  Government Degree College, Mingora (Swat)  Government Degree College, A.V.P	1.			A.V.P
Puran Shangla  Ali Rehman Lab Attendant GDC, Mingora (Swat)  Muhammad Jabbar Lab Attendant GDC, Government Degree College, Mingora (Swat)  Government Degree College, Government Degree College, AVD	2.	Bakht Amrish, Bearer, GDC, Daggar (Buner).	Government Degree College	A.V.P
Ali Rehman Lab Attendant GDC, Government Degree College, Mingora (Swat).  Mingora (Swat).  Muhammad Jabbar Lab Attendant GDC, Government Degree College, AVP	3.	· · · · · · · · · · · · · · · · · · ·	<del>-</del>	A.V.P
Muhammad Jabbar Lab Attendant GDC, Government Degree College,	4.		Government Degree College,	A.V.P
The state of the s	5.	Muhammad Jabbar Lab Attendant GDC,	Government Degree College,	A.V.P

1 | Page Class 4 Working Papers of Promotion of Class-IV to the past Project

6.	Wahid Jan Lab Attendant GDC,	Government Degree College, Gul Abad (Dir Lower)	A.V.P
7.	Gul Abad (DIR Lower).  Zarawar Khan Lab Attendant GPGC, Timergara (DIR Lower).	Government Degree College, Samar Bagh (Dir Lower)	A,V.P
TZOXI	AT DIVISION		
1.	Mir Suliman, Naib Qasid, GPGC, Karak.	Govt: Fostgraduate College Karak	A.V.P
2.	Gul Rehman, Lab Attendant GPGC, Karak	Govt: Fostgraduate College, (Karak)	A.V.P
RAN	NU DIVISION		•
1.	Inam Ullah Khan, W/Career, GPGC, Bannu	Govt: Fostgraduate College, Bannu	A.V.P
2.	Munawar Khan, Chowkidar, GDC Serai Nurang	Govt: Degree College No.2, Bannu	A.V.P
3	Islam Ullah, Tube Well Operator, GDC, Ghazni Khel.	Govt: Degree College, Domel, Bannu.	A.V.P
4.	Gul Niaz, Chowkidar, GPGC, Lakki Marwat.	Govt: Girls Degree College, Kakki (Bannu)	A.V.P
5.	Gul Rasool, Lab; Attendant, GPGC, Lakki Marwat.	Govt: Girls Degree College, Township Bannu.	A.V.P
6.	Hashim Naib Qasid GGDC Surani Bannu	Govt: Fostgraduate College, Bannu	A.V.P
7.	Muhammad Rafiq, N/Qasid, GDC, Essak Khel.	Govt: Degree College Essak Khel (Laki Marwat)	A.V.P
8.	Nasrullah Khan, L/Attendant, GDC, Essak Khel.	Govt: Fostgraduate College, Bannu	A.V.P
HA2	ARA DIVISION		
1.	Muhammad Hanif, Naib Qasid, GDC, Lassan Nawab (Mansehra).	Govt: Postgraduate College Mansehra	A.V.P
2.	Badar Zaman, Lab. Attendant, GDC, Lassan Nawab.	Govt: Degree College Pattan Mansehra.	A.V.P

### Terms & conditions:

- 1. The promotees will be on probation for a period of one year, extendable up to 02 years.
- 2. They shall join their posts within 30 days of the issuance of this notification.
- 3. Charge report should be submitted to all concerned.
- 4. Their Promotion is subject to the condition that the SSC (Matric) certificate should be verified from the concerned BISEs by the concerned Principal.
- 5. Pay will not be drawn until and unless certificate to the effect by the concerned Principal are issued that their SSC (Matric) certificate are verified from the concerned BISEs.

## DIRECTOR HIGHER EDUCATION

Endst.No 5776-5876/CA-VII/Estt:/DHE/Class-IV Fromotion 28-3-/9

Copy of the above is forwarded for information/necessary action to the.

- 1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
- 2. All Principals concerned.

- 3. Deputy Director (IT), Higher Education, Khyber Pakhtunkhwa.
  - 4. District/Agency Accounts officers concerned.
  - 5. PS to Secretary, Higher Education Department, Khyber Pakhtunkhwa.
  - 6. PA to Deputy Secretary (Admin), Higher Education Department, Khyber Pakhtunkhwa.
  - 7. PA to Director, Higher Education, Khyber Pakhtunkhwa
  - 8. Promotion cell of the local Directorate.
  - 9. Officials concerned.

DEPUTY DIRECTOR

Circulate the Same vib Circulate the Same on publish the FB paper on afficial FB paper priority bours. to day.

Deputy Director Deputy Director Education

ATTERTED

# بخدمت جناب سیطری ہائیرا یجویشن صاحب خیبر پختونخواہ بیثاور محکمانہ ایبل محکمانہ ایبل

مودبانہ گزارش ہے کہ فددی عرصہ 18 سال 6 مہینوں سے گورنمنٹ پوسٹ گریجو بیٹ کالج نوشہرہ میں مودبانہ گزارش ہے کہ فددی عرصہ 18 سال 6 مہینوں سے گورنمنٹ پوسٹ گریجو بیٹ کالی ڈیوٹی سرانجام دے رہا ہے۔ جناب عالی اب حال ہی میں مورخہ 2019-3-28 کو ڈائز یکٹر ہائیرا یجو کیشن پٹاور کی طرف سے جو کلاس فور سے جو نیز کلرک 11-8 BPS کا جو پروموشن کا آرڈر جاری ہوا ہے اس میں 2006 تک کے کلاس فور کو جو نیز کلرک 11-8 BPS میں پرموث کردیا گیا ہے۔ کیکن فددی کی مورخہ 2000-10-5 کو بھرتی ہوا ہے گیکن فددی کو پرموث نہیں کیا گیا جو کہ فددی کے ساتھ نافسانی کیا گیا ہے کہ فددی کے ساتھ نافسانی کیا گیا جو کہ فددی کے ساتھ نافسانی کیا جو کہ فددی کے ساتھ نافسانی کیا جائے اور فددی کو کلاس فورسے گیرموٹ کرے جو نیز کلرک 11-8 BPS میں کرنے کا آرڈر جاری کردیا جائے۔ آپ صاحبان کی ہوئی مہر ہانی ہوگ۔

العارض

ا بکا تا بعدار ملازم سجاد خان شیوب و مل اپریٹر گورنمنٹ پوسٹ گریجو بیٹ کالج نوشہرہ مُور خہ 2019-4-12

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لعدالت حنار سروس ترسونول عارفان بنام كورري S. A \_\_\_\_ 2019 se باعث تحرمرآ نكه مقدمه مندرج عنوان بالامين اپن طرف سے داسطے بیروی دجواب دہی دکل کاردائی متعلقہ أن مقام المحاص كيا محمد الحرين المالم وك كال من والعالم وك كال مقرركر كے اقراركيا جاتا ہے۔ كەصاحب موصوف كومقدمه كىكل كارواكى كاكل اختيار ، وكا \_ نيز وسیل صاحب کوراضی نامه کرنے وتقرر ثالت ہ فیصلہ برحلف دیسے جواب دہی اورا قبال دعویٰ اور بسورت در گری کرنے اجراءاورصولی چیک وروپیار عرضی دعوی اور درخواست ہرشم کی تقیدیق زرایں پردستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری بیطرفہ یا اپیل کی برا مدگی ادرمنسوخی نیز دائر کرنے اپیل تکرانی ونظر ثانی و پیروی کرنے کا اختیار ہوگا۔از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کوایے ہمراہ یا این بجائے تقرر کا اختیار موگا۔اورصاحب مقررشدہ کوبھی وہی جملہ ندکور، بااختیارات حاصل ہوں مے اوراس کا ساختہ برواخته منظور قبول ہوگا۔ دوران مقدمہ میں جوخر چید ہرجاندالتوائے مقدمہ کے سبب سے وہوگا۔ کوئی تاریخ بیشی مقام دورہ پر ہو یا حدے باہر ہوتو وکیل صاحب پابند ہوں مے کہ پیروی ند کورکریں ۔لہذا وکالت نا میکھدیا کیسندر ہے ۔ ,2018 \_ g .1 مے لئے منظور ہے۔ 1656

## BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

SA # 1044/2019 Sajjad Khan		Appellant
	Versus	
Govt. of Khyber Pakhtunkhw	· ·	
Through Secretary, Higher E & others		Respondents

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Respondent

# BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

• •					
SA # 1044/2019 Sajjad Khan					Appellant
<b>33</b>					
	· ·	Versus			
Govt. of Khyber Pa	.*		`.		
Through Secretary	, Higher Edu	ication	•		
& others	 			R	lespondents
	:				
•	-				
•	•	AFF <u>IDAVI</u>	r ·		
	•	111 1 1D11VI	<b>_</b>		
•					
I, Jehanz	eb Khan	Superintendent	(Litigation)	Higher	Education
Department do l	nereby decl	are and affirm o	n oath that t	he conte	nts of Para
Wise Comments	are correct	to the best of n	ny knowledge	and belie	ef and that
nothing has been	concealed	from this Honour	able Court.		-
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Identified by:	t.			Dep	oment

## BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

*# 1044/2019 Mr. Sajjad Khan			Appellant
MI. Sajjau Kilaii	. *	ersus	
Govt. of Khyber Pakhtunkh	wa		
Through Secretary, Higher	Education		
And others	**********		Respondents

## SUBJECT: PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO. 1 AND 2

### Respectfully Sheweth: -

### Preliminary Objections: -

- 1. That the Appellant has got neither cause of action nor locus standi to file the instant service appeal.
- 2. That the Appellant has not come to this Honourable Court with clean hands and is trying to conceal material facts.
- 3. That the instant service appeal is hit by doctrine of laches.
- 4. That the Appellant is estopped by his own conduct to file the instant service appeal.
- 5. That the case of the appellant is under process and will be decided in accordance with prevailing rules and policy.

#### Facts:-

- 1. Pertains to the record.
- 2. Pertains to the record.
- 3. Correct.
- 4. Pertains to the record.
- 5. Correct to the extent that the appellant was eligible to be promoted to the post of junior clerk and he was considered accordingly in DPC meeting but he has not been promoted and considered deferred to the said post due to non-provision of necessary documents i.e. PER and service book (Annex-A).
- Pertains to the record.

### Grounds: -

- a) Incorrect. The appellant has been treated within the due course of law.
- b) Incorrect. As already explained in the preceding paras.
- c) Incorrect. Detail reply has been given in Para 5.
- d) Incorrect. As already explained in the preceding paras.
- e) Incorrect. The appellant has been treated according to rules.
- f) Incorrect. As already explained in the preceding paras.
- g) The respondent may be allowed to raise additional grounds at the time of arguments.

#### Prayers: -

It is, therefore, humbly prayed that the instant appeal is based on misstatement/misrepresentation hence may graciously be dismissed with costs.

Secretary, 1816 70 18

Respondent No. 01

Director,

110/2

Higher Education Department Respondent No. 02

# WORKING PAPE () FOR DEPARTMENTAL PROMOTION COMMITTEE (D-P-C)

PROMOT ON OF CLASS-IV EMPLOYEES OF HIGHER EDUCATION DEPARTMENT SUBJECT: JUNIOR C: ERKS (BPS-11) 33% QUOTA

1. In light of service Jules of Ministerial Staff against 33% reserved quota for promotion of Class-IV to the Post of Junior : Elerks BPS-11 and 67% for direct recruitment the promotion case of Class-IV to the post of Junic. Clerk BPS-11 of Hazara, Kohat, Bannu, Peshawar, Mardan and Malakand Division is submitte : for consideration:

2. There are a total of 337 Sanctioned posts of Junior Clerks in Higher Education Department out of which 111 posts it il to promotion quota @ 33%, out of which 71 has already been promoted while 40 Class-IVs are to be promoted to the post of Junior Clerks BRS-11 to fulfill the required quota under 33% on the 1, 1sis of Seniority cum fitness and 67% through direct recruitment.

t is performent to mention that 71 Class-IV have already been promoted and 40 Class-IV will be pro noted on the same criteria.

- 3. According to the Seniority List (Annexure-III) the following panel of 40 Class-IV is submitted-
- 4. Total sametioned posts of Junior Clerk = \$37
- 5. Total filled pos nons of class-IV under 33 % quota = 71
- 6. Total positions to be promoted under 33 % quota = 40

PESHAWA DIVISION

· ——	HAWA DIVIDA	ţ.			Date of	Remarks
S# Name	M Designation	Qualification	Date of passing SSC	Date of birth	apptt;	
1 .	·	<u> </u>	1980-	22-09-1962	01-01-1988	
(1) Samar	Gul, N ; ter	SSC	1960-		<u></u>	
carrier	, GPGC	1		i i	∜ <u>`</u>	
Chars	adda	<u> </u>	1999	1:8-04-1977	01-08-1998	
<u> </u>	fat Ahu ; d, Naib	:ssc ·	1999	WD-04, 45# "		1 1
2) Shara	Direct frate of		4			}
Qasio	Direction -		1			1 1
Highe	r Education,					<u> </u>
Khybe	er Pakh inkhwa	SSC	1997	03-04-1980	13-04-1999	
Loui Acad	Hussai Naib		<u> </u>	1	1	
Oasid	, GDC, rabbi					
Chlorus	hera)			03-10-1980	:09-08-1999	
1	n Masir., Sweeper,	ssc	1999	1960	1/	1
, 4) Azeer	Chars dda			00.05.3077	01-09-1999	
1	ar Alam Sweeper,	SSC	1992	03-05-1973	כככר-פטרוטו	1 1
5) Sarda	torate (Higher.	1 1				
Direc	torale (11262)	l [				
Educ	ation, !: nyber	i	; :			ACR &
Pakh	Nazar howkidar,	:SSC	1986	14-07-1969	07-12-1999	Service Book
6) Shar	Nazar Juowica-	' 1×	1	to	Heres	Missing
GGD	C Now: \ era	ssc	1994	01-04-1978	12-08-2000	
Thea	n Ullah Naib Qasid	i, isst	1004	01-01-1500 ,	7	
1 1 - 1	ctorate Higher	1	1 1		1	
Edin	cation, {byber	,				
11 1-33	aminkh i il		1000	110:00 2074	11-10-2000	_
ta or isoni	addChail. Tubewell	- SSC	1994	'1.	A TO	1 1
8) Sail	rator, C. GC			- 1.1.	to porkin	of OFR
No	shera			Jun 240/60	1 10 FOON FAM	714
L			•	<i>i- y</i>	J	V .

`	f P						•
	1				·		V - 7
							134
	Abida Qazi, Class V, GRCW Peshawar	SSC	2008	03-06-1982	-08-06-2005 Dominor of P	eR_	
	Johar Ali, Naib Çasid, GC Peshawar	SSC	2003	04-03-1984	10-03-2006	-	
	Hafsa, Lab Attd:- GGDC Pabbi Nowshera	SSC	1999	15-04-1981	13-10-2006		
MA	RDAN DIVISION		<u> </u>				
[]	Inayat Ullah Khay Lab	SSC	1976	12-02-1960	25-09-1988	ļ-	
	Attendant GDC, Cotha Swabi	- T T			*		
-	Noor Mehmood, Mali, GPGC, Swabi	SSC	1991	20-03-1974-	04-05-1995		
	Dilawar Khan, 1 ab-	SSC	2011	04-11-1974	07-10-1995		
•	Attendant, GDC,	550	2011				
	Bakhshali (Mardan)	SSC	1992	05-03-1976	01-04-1996	No	willing
r.	Shafiq Ahmad, Chowkidar, GG C,	220	1992	Not promo [	X	pr	for v.
	Maneri(Swabi)	SSC	1996	15-03-1977	06-01-1997		
5.	Bashir Ali Chov kidar, GGC,Sheikh Malioon	350	1,3,5				
б.	Mardan   Shahzed Khan, Lab attd:	SSC	2009	18-04-1978	01-04-1999		
7.	GDC Taktbai Sajid Ullah, La') attd:	SSC	1986	04-10-1967	01-06-1999		
8.	GDC Kotha, Sv. i bi Sameen Khan, i ab attd: GDC Kotha, Sv. abii	SSC	1991	12-01-1975	01-06-1999		
	JALAKAND DIVISION			<u> </u>			
<u> 1.</u>	Nisar Ahma: TWO	SSC	1988	06-04-1965	01-12-1983		
į	GPGC, Timer ara (DIR						
2.	Bakht Amrish Bearer, GDC, Daggar (Er ner)	SSC '	1988	20-03-1968	06-12-1987		
	Rasool Muhar mad Lab	SSC	1988	18-04-1961	01-12-1988	No	t willing
3.	Attendant GPC. , Timergara (DIF _ower)			Not promoles	X X	pr	for omotion
	Dowlat Kh. Lab	SSC	1989	01-01-1971	21-12-1993		
4.	Attendant GDC	;					
	Puran Shangla Lab	SSC	1989	1-12-1972	11-11-1995		
5.	Attendant GDC						
	Mingora (Swat)	SSC	1983	02-10-1965	11-12-1995		
6.	Muhammad Jipbar Lab Attendant GDC,						
	Gul Abad (DIR Lower)	SSC	1993	1-04-1975	11-12-1995	1	
7.	Wanid						
	Gul Abad (DIR ower)  Zarawar Kin Lab	SSC	1983	05-03-1967	07-01-1996		
8.	Attendant GPC				V		
	Timergara (DII Lower) Said Razaq, N b Qasid,	ssc .	1990	02-03-1974	20-07-1996		ACR &
9.	GPGC Timerge 1	Diche	wied-		<b>X</b>	1	Service " Book

t Oi	T.		•	i de la companya de l		1//
· C	HAT DIVISION					
Λ	Muhammad Ash, af,	SSC	1989	15-11-1966-	16-11-1984	Not willing
	Lab- Attendant, DC,		4		)	for V
	Lachi Kohat		Superson	Noticlear		promotion
	Mir Suliman, Nab Qasid,	SSC	1979	01-02-1962	01-02-1990	T
<i>:</i>	GPGC, Karak		13"3			
<i>4</i>	Rasool Marjan , Mali,	SSC	1989	05-04-1970	16-09-1991	Not willing
	GPGC, Karak			Supersen	ed of	for
		· "		II	7 7000	promotion
4.	Gul Rehman, Lago	SSC	1990	04-06-1973	27-02-1999	
	Attendant GPGC, Karak	1		•		
> <u>B</u>	ANNU DIVISION	! :				
1.	Inam Ullah Khan,	S-S-C	1998	10-10-1973	01-11-1991	
	W/Career, GPGC, Barmu	r			\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	
2	Munawar Khan,	FA	2000	23-03-1975	30-05-1993	
1	Chowkidar, GIC Serai					
	Nurang					
, 3	Islam Ullah, Tabe Well	SSC	1993	17-4-1975	24-5-1994	
	Operator, GDC, Ghazni	-	· F			
	Khel		]			-
4:	Gul Niaz, Chovicidar,	SSC	1994	10-3-1976	03-9-1995	'
1	GPGC, Lakki Marwat		4		\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	200
5.	Gul Rasool, Lal;	s-s-c	1993	5-2-1975	1-4-1996	
	Attendant, GFCC, Lakki			·	1	
	Marwat			-	'	
6:	Hashim Naib Gasid	s-s-c	1993	27-02-1972	06-11-1996	
	GGDC Surani Bannu	ssc	1996	7-03-1980	12-1-1999	
7.	Muhammad Raiq, N Qasid, GD( Essak	330	1990	1 4-05-2980	12-1-1999	
	1 1		4	-		
1	Nasrullah Khen,	S-S-C	1996	16-02-1973	13-1-1999	
.8.	L/Attendant, GDC, Essak			10 02-19/13	TO-1-1222	
	Khel					
	Muhammad Pran,	S-S-C	1992	15-09-1976	13-1-1999	NOD 2
9.	L/Attendant, LDC, Essak			1000 1910	10-1-1999	ACR & Service
	Khel	The same of the sa	.]	1		Book
	Nation 1	20		$\Box$ $a$	existed 4	Missing
>	HAZARA DIVISICAI				1	
1.	Muhammad Hanif, Naib	SSC	1992	01-01-1975	01-06-1995	
	Qasid, GDC, I assan	111111111111111111111111111111111111111			22 00-1993	1 .
	Nawab (Manseirra)	455				
2.	Badar Zaman, Jab- Attendant, GLO, Lassan	ssc	1977	21-04-1961	19-11-1995	
'	Nawah				1 1	
3.	Nasir Lab Attendant GDC,	SSC	1995	20-04-1978	00.04.3005	
3	Sherwan			1 20-ψπ-13//9	22-04-1996	ACR &
		1		de	1	Book
<u> </u>	Certificate:		<u>'İ</u>	1	7 7 7	Missing
-   0	eruncaic.	,	•	: /		

It is certified that their seniority is meither disputed nor subjudiced in any count of law, Certified that no departmental/disciplinary proceedings against the officials is in process/pending.

DEPUTY DIRECTOR