

FORM OF ORDER SHEET

Review Petition No. 196/2024

Proceedings with signature of judge

3

27/02/2024

The Review Petition of Mr. Daleel Shah submitted today by Mr. Noor Muhammad Khattak Advocate. It is fixed for hearing before Division Bench at Peshawar on _____. Original file be repositioned. Parcha Peshi is given to the counsel for the petitioner.

By the order of Chairman


REGISTRAR

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

REVIEW PETITION NO. 196 /2024
IN
APPEAL No. 1707/2023

MR. DALIL SHAH

V/S

EDU: DEPTT:

INDEX

S. NO	DOCUMENTS	ANNEX	PAGE
1.	Grounds of Review Petition with affidavit	1-4
2.	Copy of Memo of Service Appeal, promotion dated: 10/12/2020, and withdrawal of promotion order dated: 19/05/2023 & relevant documents	A, B & C	5-16
3.	Copy of Judgment/order dated 08/01/2024	D	17-23
4.	Copy of the DPC and Promotion Policy dated: 13.11.2012	E & F	24-50
5.	Vakalat Nama	-	51

Dated: 22/02/2024

PETITIONER/APPELLANT
THROUGH:
NOOR MUHAMMAD KHATTAK
ADVOCATE SUPREME COURT
&
MAHMOOD JAN
ADVOCATE HIGH COURT

-1-

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

REVIEW PETITION NO. 196 /2024

IN

APPEAL No. 1707/2023

Mr. Dalil Shah, CT (BPS-15),
GMS Mir Meta Sheikhan, District Orakzai.

..... PETITIONER/APPELLANT

VERSUS

- 1- The Secretary, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 3- The District Education Officer, District Orakzai.

.....RESPONDENTS

REVIEW PETITION UNDER SECTION 114 READ WITH ORDER XLVII RULE 1 OF CPC AND OTHER ENABLING PROVISIONS AGAINST THE JUDGMENT DATED 08/01/2024.

R.SHEWETH:

Petitioner/appellant respectfully submits as under:

- 1- That, the petitioner/appellant has filed Service Appeal No 1707/2023 before this august Tribunal, challenging the order dated 19/05/2023, whereby promotion order dated 10/12/2020 was withdrawn by the respondents. Copy of Memo of Service Appeal, promotion dated: 10/12/2020, and withdrawal of promotion order dated: 19/05/2023 & relevant documents are attached as annexure.....**A, B & C**
- 2- That the said Service Appeal was decided on 08/01/2024, wherein it was held that the promotion order dated: 10.12.2020 was rightly withdrawn, and the salaries and back benefits were protected in the favour of the petitioners. Copy of Judgment/order dated 08/01/2024 is attached as Annexure.....**D**

- 3- That it is pertinent to mention here that such order is liable to be reviewed on the ground that the withdrawal followed by the judgment of this august tribunal to the extent of the present petitioner/appellant, as the present appellant was working on BPS-14 SPST, not on BPS-12 PST. It is pertinent to mention here that, the promotion order was of the petitioner/appellant was held according to the law and rules, meaning thereby through proper channel. The DPC for the said promotion was held and after that the petitioner/appellant was recommended for the promotion to the said post. Copy of the DPC and Promotion Policy dated: 13.11.2012 are attached as Annexure.....E & F
- 4- That it is also worthy to mention here that, the order dated 08/01/2024 to the extent of observing the appellant on BPS-12 PST is not supported by the available service record, and the same are against the fact of the case file.
- 5- That while delivering the impugned order and judgment dated 08/01/2024 available material on record was not properly appreciated and was mis-interpreted, which amount to be an error and is liable to be reviewed on the following grounds amongst others:-

GROUND:

- A- That the impugned order and judgment dated 08/01/2024 is the result of mis-appreciation and mis-interpretation of available evidence on record, which amounts to be an error, and is liable to be reviewed, may kindly be reviewed.
- B- That the withdrawal order issued by the respondents, regarding the promotion of the petitioners from the post of CT to the PST is wrong, illegal on the ground that the petitioners were properly promoted to the post of CT as they were senior most employees of the respondent department.
- C- That the withdrawal order dated 19/05/2023 of the respondents, whereby the promotion of the petitioners was withdrawn from the post of CT to the post of PST is wrong and illegal as the petitioners were properly promoted through usual channel (DPC), therefore, the impugned judgment dated 08/01/2024 is liable to be reviewed and the petitioner is entitled to his previous post/CT.

- D- That the instant case of the petitioners is different from other one, therefore, withdrawal order of the respondents are wrong and illegal and liable to set aside as the petitioner is promoted according to the law and rules.
- E- That this August Tribunal without considering the record available in the Service Appeal and especially the impugned order dated 19/05/2023 for which the attention of this august Tribunal is very much necessary, whereby the promotion order of the petitioner/appellant have been withdrawn unlawfully and this Honorable Tribunal was not properly assist to the extent of the appellant, working on the BPS-14 SPST at the time of passing of the promotion order to BPS-15 CT (Certified Teacher).
- F- That it is a settled principal of law that the authority issuing an order shall be competent to review the same and to avoid miscarriage of justice.
- G- That if the mentioned correction is not rectified in the judgment dated 08/01/2024 of this Honourable Tribunal, the same will prejudice the rights of the petitioner/appellant, as the same is not according to the materials on the record.
- H- That the said order and judgment dated 08/01/2024 is not passed by proper reflection of available record.
- I- That petitioner seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore humbly prayed that on acceptance of this Review petition the order and judgment dated 08/01/2024 may very kindly be reviewed/set aside to the extent of the present petitioner/appellant and the petitioner be placed at the post of Certified Teacher (CT).

Any other relief, which this Honourable Tribunal may deem fit in the circumstances may also be awarded in favour of petitioner/appellant.

Dated: 22/02/2024


PETITIONER/APPELLANT

THROUGH:


NOOR MUHAMMAD KHATTAK
ADVOCATE SUPREME COURT

&


MAHMOOD JAN
ADVOCATE HIGH COURT

-4-

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

REVIEW PETITION NO. _____/2024

IN

APPEAL No. 1707/2023

MR. DALEEL SHAH

V/S

EDU: DEPTT:

AFFIDAVIT

I, Mr. Daleel Shah, CT (BPS-15), GMS Mir Meta Sheikhan, District Orakzai, do hereby solemnly affirm on oath that the contents of the accompanied **Review** **Petition** are true and correct to the best of my knowledge and believe and nothing has been concealed from this Honorable Tribunal.



DEPONENT

-A "A" -5-

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL NO. 1707 /2023

Mr. Dalil Shah, CT (BPS-15),
GMS Mir Meta Sheikhan, District-Orakzal.

..... APPELLANT

VERSUS

- 1- The Secretary Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 3- District Education Officer, District Orakzal.

..... RESPONDENTS

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED ORDER DATED 19.05.2023 WHEREBY THE PROMOTION ORDER DATED 10.12.2020 OF THE APPELLANT HAS BEEN WITHDRAWN AND AGAINST THE APPELLATE ORDER DATED 30-05-2023 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT HAS BEEN REGRETTEED ON NO GOOD GROUNDS.

PRAYER:

That on acceptance of this appeal the impugned order dated 19.05.2023, and the Appellate order 30.05.2023 may very kindly be set aside and the promotion order dated 10.12.2020 be restored with all back benefits. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

R/SHWETH:

ON FACTS:

1. That appellant was an employee of the respondent Department and performing his duty with full zeal & zest and up to the entire satisfaction of his high ups.
2. That the appellant being qualified was appointed as PST on 24.11.2009, in the respondent department and since then they are working with the full zeal and zest.
3. That It is pertinent to mention here that 60 number of posts of CT (BPS-15) were laying vacant in the District Orakzal. That a DPC was held to fill up the subject posts and amongst these posts 36 number of posts were allocated to the quota of PST/PSHT/SPST. That a DPC meeting was held on 14.10.2020 wherein the appellant was recommended for the post of CT (BPS-15) and vide notification

- 2 - - 6 -

dated 10.12.2020 the appellant was promoted to the post of CT (BPS-15). Copies of the minutes of the DPC dated 14.10.2020 and notification dated 10.12.2020 are attached as annexureA&B.

4. That the appellant is a highly qualified person and his field. Copy of the educational testimonials are attached as annexureC.
5. That in pursuance to the notification the appellant started performing his duties with devotion and up to the entire satisfaction of his superiors.
6. That vide letter dated 11.04.2023 the respondent No. 3 was asked to withdraw the promotion order dated 10.12.2020, in response to which the respondent No. 3 vide letter dated 09.05.2023 requested the respondent No. 2 for the review of the decision. Copies of the letters are attached as annexureD.
7. That astonishingly vide impugned office order dated 19.05.2023 the promotion order dated 10.12.2020 of the appellant was withdrawn in utter violation of the law and rules on the subject. Copy of the office order dated 19.05.2023 is attached as annexureE.
8. That the appellant feeling aggrieved from the impugned office order dated 19.05.2023 preferred departmental appeal. Copy of the departmental appeal is attached as annexureF.
9. That the departmental appeal was rejected vide appellate order dated 30.05.2023 as noted on the departmental appeal with no good reasons.
10. That having no other remedy preferred the instant appeal on the following grounds amongst the others.

GROUND:

- A- That the impugned order dated 19.05.2019 and appellate order dated 30.05.2023 issued by the respondents are against the law, facts, norms of natural justice and materials on the record hence not tenable in the eyes of law.
- B- That the appellant has not been treated in accordance with law and Rules by the respondents 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 no show cause notice has been served upon the appellant before the issuance of the impugned orders.
- D- That no right of defense has been provided to the appellant hence he has been condemned unheard thus violated Article-10-A of the constitution of the Islamic Republic of Pakistan, 1973.

- 3 - 7 -

- E- That under the principle of *Locus Poenitentiae* the respondents are duty bound not to withdraw the promotion order.
- F- That no regular inquiry has been conducted in to the matter before the issuance of the impugned orders.
- G- That the respondents acted in arbitrary and malafide manner by issuing the impugned orders.
- 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 very graciously be accepted as prayed for, please.

Dated: 31-05-2023

APPELLANT


DALIL SHAH

Through:



NOOR MOHAMMAD KHATTAK


KAMRAN KHAN


UMAR FAROOQ


MUHAMMAD AYUB


WALEED ADNAN


MAHMOOD JAN

Advocates, Peshawar

AFFIDAVIT

I, Dalil Shah, CT (BPS-15), GMS Mir Meta Shelkhan, District Orakzai, do hereby solemnly affirm and declare on Oath that the contents of this Service Appeal are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Tribunal.


DEPONENT

4/11/5B^c

4B^c

8-8-

District Education Office
District Orakzai

No. 6560
Dated 12/12/2020

Phone: 0923-85011 FAX: 0723-670017

Notification:

As recommended by the Departmental Promotion Committee during its meeting held on 14/10/2020, vide Minutes No. 35/4, the competent authority has been pleased to promote & adjust the following male PST/SPST/PSHT teachers from PST/SPST/PSHT to CT Post BPS-15 against the vacant post in various schools mentioned against their names in District Orakzai with immediate effect in the interest of public service:

Sl. No.	S.L.R.	Name of Teacher	BPS	Date of Birth	Res. in Service	Name of School	Name of the School where Posted
1	26	Zenair Ali	15	05/02/1970	01/03/1993	GPS Naor All Garhi	GMS Mirzai
2	65	Amal Hassan	15	01/08/1970	23/05/1995	GPS Garhi Mani Khel	GHSS Kalaya
3	26	Hassanullah	15	13/02/1972	31/03/2001	GPS Khawas Khel	GMS Anwarh Mela
4	159	Ali Majan	15	05/03/1979	01/09/2003	GPS Sarki Akhe	G S Toof Bogh Orakzai
5	160	Yasin Ullah	15	02/01/1980	01/09/2003	GPS Sarki Mishli	GMS Mishli Barar
6	161	Munawar Shah	15	10/03/1982	01/10/2003	GPS Sarki Khel	GMS Inzer Palli
7	165	Abdul Shaheed	15	01/03/1972	23/10/2003	GPS Samra Mamatal	GMS Dran Shekhan
8	169	Samar Gul	15	01/01/1979	29/07/2004	GPS Sangra	GMS Mishli Barar
9	170	Khali ur Rehman	15	05/06/1979	03/08/2004	GPS Tarap All Khel	GMS Sarki Khel
10	178	Muhammad Umer	15	22/04/1976	03/09/2005	GPS Romic Sola	GMS Gulistan
11	218	Mir Asghar Waheed	15	14/10/1980	05/09/2005	GPS Khangar Barar	GMS Sarki Khel
12	219	Ullah	15	02/02/1979	23/10/2005	GPS Bland Khel No.2	GPS Bland Khel
13	257	Jahid Hussain	12	05/05/1995	24/11/2009	GPS Sier Sam Khel	GMS Sier Sam
14	278	Muhammad Yaqoob	12	01/03/1986	24/11/2009	GPS Mir Kalam Khel	GMS Qasim Khel Orakzai
15	279	Muhammad Hanif	12	09/03/1987	24/11/2009	GPS Malang garhi	GMS Yakhai Kandaw
16	280	Masceeb Rehman	12	21/12/1985	24/11/2009	GPS Bado Shekhan	GMS Mishli Barar
17	287	Gul Karim	12	05/10/1985	24/11/2009	GPS Gul Cheri	GMS Babera Lodi
18	287	Gul Karim	12	15/01/1982	03/17/2009	GPS Bilazawi Khel	GMS Sali Faraz Khel
19	288	Erqi Sheik	12	04/04/1980	24/11/2009	GPS Dazed Khel	GMS Mir Mela Shekhan

District Education Officer
Orakzai District at Hangu

OFFICE OF THE DISTRICT EDUCATION OFFICER DISTRICT ORAKZAI

Dated: 10-12-2020

NOTIFICATION

As recommended by the Departmental Promotion Committee during its meeting held on 14/10/2020 vide Minutes No 3514 the competent authority has been pleased to promote & adjust the following male PST/SPST/PSHT teachers from PST/SPST/PSHT to CT Post BPS-15 against the vacant post in various schools mentioned against their name and district Orakzai with immediate effect in the interest of public service.

S. No	SL #	Name of Teacher	BPS	Date of birth	Regular service	Current school	Name of the school where posted
1)	36	Zeenat Ali	15	05/02/1970	01/03/1993	GPS Naar Ali Ghari	GMS Mirazai
2)	65	Amal Hassan	15	01/08/1970	23/05/1995	GPS Ghari Mani Khel	GHSS Kalaya
3)	126	Hasan Ullah	15	13/02/1972	31/03/2001	GPS Khawas Khel	GMS Taali Bagh Ghari
4)	159	AE Majan	15	05/03/1979	01/09/2003	GPS Sarkd Akhe	GPS Mishi Bazar
5)	160	Yasin Ullah	15	02/01/1980	01/09/2003	GPS Sari Mishi	GHS Iner Palai
6)	161	Munawar Shah	15	10/03/1982	01/10/2003	GPS Sarki Khel	GPS Dran Sheikah
7)	166	Abdul Shakoor	15	01/03/1972	23/10/2003	GPS Sama Mamazai	GHS Misi Babar
8)	169	Samar Gul	15	01/01/1979	29/07/2004	GPS Sahgra	GMS Sarki Khel
9)	170	Khair Ul Rehman	15	05/06/1979	03/08/2004	GPS Tarapi Ali Khel	GHS Gulstan
10)	178	Muhammad Umar	15	22/04/1976	03/09/2006	GPS Rambia Sold	GPS Sarki Khel
11)	218	Malik Asghar	15	16/01/1984	05/09/2005	GPS Khangr Baba	GHS Bidand Khel
12)	219	Waheed Ullah	15	02/02/1979	23/10/2005	GPS Biland Khel No 2	BMS Sari Sam
13)	277	Ibar Hussain	12	05/05/1985	24/11/2009	GPS Sler Sam	GHS Bidand Khel
14)	278	Khaishta Jan	12	01/03/1986	24/11/2009	GPS Malang Ghari	GMS Sari Sam
15)	279	Muhammad Yaqoob	12	09/03/1979	24/11/2009	GPS Bara Sheikahn	GMS Qasim Khel Orakzai
16)	280	Muhammad Hanif	12	21/12/1982	24/11/2009	PGS Gul Cheri	GMS Yakha Kandow
17)	282	Naeab Ur Rehman	12	05/10/1985	24/11/2009	GPS Bilzawai	GHS Mishi Babar
18)	283	Gul Karim	12	15/01/1982	03/12/2009	GPS Bazed Khel	GMS Bader Laki
19)	284	Dalil Shah	12	01/04/1980	24/11/2009	GPS Bazed Khel	GMS Safri Feroz Khel

20	285	Amir Ur Rehman	12	20/05/1984	24/11/2009	GPS Joba Kado	GHS AVI Melo
21	287	Gul Rahim	12	05/04/1979	24/11/2009	GPS Korapo Samana	GHS Gulistan
22	288	Ashfaq Ali Maskeen Khan	12	18/03/1985	24/11/2009	GPS Khar Khushlo	GMS Khalil Sepoy, KHUrol
23	289	S.Khadim Hussain	12	10/04/1984	02/12/2009	GPS Toor Kohi	GMS Dambaga Loili
24	290	S.Khadim Hussain	12	03/05/1985	24/11/2009	GPS Shamer	GHS And Khe
25	291	Raees Akbar	12	16/02/1982	24/11/2009	GPS Gahlan	GHS Dian Shelkhan
26	293	Hussain Zehar Minwar Khan	12	10/02/1981	24/11/2009	GPS Palosi	GMS Khalil Sepoy
27	295	Minwar Khan	12	10/05/1986	24/11/2009	GPS Inawal	GHS Salali Dara
28	298	Hassan	12	09/10/1987	24/11/2009	GPS And Khe Bala	GMS Zora
29	300	Amjad Khan	12	10/02/1985	25/11/2009	GPS Mirzap, All Khe	GMS Zankh Khe
30	302	Saib ul Haq	12	20/04/1986	24/11/2009	GPS Porlan All Khe	GMS Alwarha Mala
31	303	Amir ur Rehman	12	03/10/1982	24/11/2009	GPS Khadizal No.1	GHS Swara Kol
32	304	Hikmat Khan	12	02/10/1983	24/11/2009	GPS Sawara Kol	GHS Swara Kol
33	305	Minwar Khan	12	25/10/1982	24/11/2009	GPS Chapper Khush	GMS Baba Labi
34	307	Muhammad Ghani	12	26/02/1985	24/11/2009	GPS Kol All Khe	GMS Damner Loili
35	308	Painda Khan	12	10/04/1984	25/11/2009	GPS Yusuf Khe	GHS Bagh Nali
36	312	Ismail Khan	12	12/05/1986	24/11/2009	GPS Khadizal No.2	GMS Dana Khula

Terms & Conditions:

1. They would be on probation for a period of one year extendable for further period of one year.
2. They will be governed by such rules & regulations as and when issued from time to time by the govt.
3. Their services can be terminated at any time in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be proceeded under the rules framed time to time.
4. Charge report should be submitted to all concerned.
5. Inter-se seniority on lower post will remain intact.
6. No TA/DA is allowed for joining his duty.
7. They will give an undertaking to be recorded in their service book to the effect that if any over payment is made to him in light of this order will be recovered and if he is wrongly promoted he will be reversed.

DISTRICT EDUCATION OFFICER
DISTRICT ORAKZAI

Enclst No. 6661-69 dated: 10/12/2020

Copy forwarded for information and necessary action to the

1. Director Education (E&SE) Khyber Pakhtunkhwa Peshawar.

20)	285	Mati Ur Rehman	12	20/05/1984	24/07/2009	GPS Jaba Kada	GHS Aul Mela
21)	287	Gul Rahim	12	05/04/1979	27/11/2009	GPS Karapa Samana	GHS Gulstan
22)	288	Ashlaa Ali	12	18/03/1985	24/11/2009	GPS Khar Khushia	GMS Khail Sepoy (Khural)
23)	289	Maskeen Khan	12	10/04/1984	02/12/2009	GPs Toor Kani	GMS Domber Lasti
24)	290	S. Khadim Hussain	12	03/05/1985	24/11/2009	GPS Shamer	GHS Dran Sheikhan
25)	291	Raees Akbar	12	16/02/1982	24/11/2009	GPSZakhian	GMS Khail Seopy
26)	283	Husain Asghar	12	10/02/1981	24/11/2009	GPS Palosi	GHS Saif Dhara
27)	225	Munwar Khan	12	10/05/1986	24/11/2009	GPS Injavar	GMS Zera
28)	298	Sherin Hassan	12	09/01/1987	24/11/2009	GPS And Khel Bala	GMS Unki
29)	300	Amjad Khan	12	18/02/1985	24/11/2009	GPS Opl ALI Khel	GMS Aiwarha
30)	302	Said Ul Islam	12	20/04/1986	24/11/2009	GPs Panjama Ali Khel	GHS Swara Khel
31)	323	Amir Ur Rehman	12	03/10/1972	24/11/2009	GPS Khandi Zai No 1	GHS Swara Khel
32)	304	Hikmat Khan	12	02/10/1983	24/11/2009	GPS Sawara Khel	GMS Baera Khel
33)	306	Munawar Khan	12	25/10/1982	24/11/2009	GPS Koi Ali Khel	GMS Damber Khel
34)	307	Muhammad Ghani	12	26/02/1985	24/11/2009	GPS Yousaf Khel	GHS Bagh Nak
35)	308	Painda Khan	12	13/04/1984	25/11/2009	GPS Khadi zai	GMS Dana Khula
36)	312	Isrial Khan	12	12/05/1986	24/11/2009	GPS Khadi Zai No 2	

Terms and conditions:-

1. They would be on probation for a period of one year extendable for further period of one year.
2. They will be governed by such rules and regulation as and when used from time to time by the Government.
3. Their services can be terminated at any time in case his performance is found unsatisfactory during probationary period in case of misconduct they shall be proceeded under the rules framed time to time.
4. Charge Report should be submitted to all concerned.
5. Their inter-seniority on lower post will remain in
6. No TA/D.A is allowed for joining his duty.
7. They will give an undertaking to be recorded in their service book to the effect that if any over payment is made to him in light of his order, will be recovered and if is wrong promoted he will be reversed.

District Education Officer
District Orakzai

Endst: No 6661-69

Dated 10/12/2020

Copy forwarded for information and necessary action to the

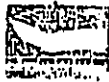
1. Director Education (E&SE) Khyber Pakhtunkhwa

- 10-
2. Deputy Commissioner, Orakzai.
 3. District Monitoring Officer, Orakzai.
 4. District Account Officer-District Orakzai.
 5. PS to the Secretary to Govt. Khyber Pakhtunkhwa - E& SE Department, Peshawar.
 6. PA to the Director (E&SE) Khyber Pakhtunkhwa Peshawar.
 7. Accountant Local Office, Orakzai.
 8. Teacher concerned.
 9. Master File.

DISTRICT EDUCATION OFFICER
DISTRICT ORAKZAI

2. Deputy Commissioner Orakzai
3. District Monitoring Officers, Orakzai
4. District Account Officer District Orakzai
5. PS to Secretary to Govt: Khyber Pakhtunkhwa SE Department, Peshawar.
6. PA to the Director (E&SE) Khyber Pakhtunkhwa, Peshawar.
7. Accountant Local Office, Orakzai
8. Teacher concerned
9. Master File.

*District Education Officer
District Orakzai*



District Education Office
District Orakzai

No. 3514

Phone: 0922-490017 FAX: 0922-490017 Dated 14/10/2020

MINUTES OF THE MEETING OF DEPARTMENTAL PROMOTION COMMITTEE HELD ON 14-10-2020 AT 10:30 AM

A meeting of the Departmental Promotion Committee was held today on 14-10-2020 at 10:00 AM under the Chairmanship of District Education Officer District Orakzai, to discuss the promotion cases of Male, PST/SPST/PSHT to CT B-15, in the District Education Office Orakzai. The following attended the meeting:

- | | |
|--|--------------------------|
| 1. Mr. Fareed Ullah Mehsud, District Education Officer | Chairman |
| 2. Mr. Hameed Ullhan Jan, Additional Director NMD | (KPE&S&O Representative) |
| 3. Mr. Saif Ullah, Principal B-19 GHS Mandail District Orakzai | Member |
| 4. Mr. Muhammad Iqbal, HM GHS Mishli Bazar | Member |
| 5. Kausar Ali, ADEO District Orakzai | Member |
| 6. Mr. Abdul Abdul Malik, ADEO District Orakzai | Member |
| 7. Mst. Nabila Naz, ADEO District Orakzai | Member |
| 8. Mr. Shakeel Ahmed, SST GHS Swaro Kol | Member |
| 9. Mr. Wahid Ullah, SCT GMS Bagara Mishli | Member |

The meeting started with recitation from the Holy Quran. The Chair welcomed the participants. The following items were discussed in detail by the DPC keeping in view all the aspects of the case and finally unanimously recommended the promotion of the following teachers on the vacant post with immediate effect

Item No. 1 PROMOTION OF PST/SPST/PSHT (MALE) FROM TO CT BPS-15 ON REGULAR BASIS

The case of promotion of PST/SPST/PSHT (MALE) to CT BPS-15 against vacant posts was considered and the DPC recommended as under:

Total No. of CT (M) Vacant Post	60
60 % share of PST/SPST/PSHT Posts	36
Share of promotion 100%	36
Net to be Promoted	36
Available for promotion	36
Recommended for promotion to CT	36

DISTRICT EDUCATION OFFICER
DISTRICT ORAKZAI

Dated: 14-10-2020

MINUTES OF MEETING OF DEPARTMENTAL PROMOTION COMMITTEE
HELD ON 14/10/2020 AT 10:30 AM.

A meeting of the Departmental promotion committee was held today on 14/10/2020 at 10:00 am under the Chairmanship of District Education Officer District Orkzai to discuss the promotion cases of Male PST/SPST/PSHT to CT B-1 in the District Education Office Orakzai the following attended the meeting.

- | | |
|---|------------------------|
| 1. Mr. Fareed Ullah Mehsud District Education Officer | Chairman |
| 2. Mr. Hameed Ullah Jan, Additional District NMD | (KPSSD Representative) |
| 3. Mr. Saif Ullah, Principala B-19 GHS Mandali District Orakzai | Member |
| 4. Mr. Muhammad Iqbal HM GHIS Mishti Bazar | Member |
| 5. Kausar Ali ADEO District Orakzai | Member |
| 6. Mr. Abdul Malik ADEO District Orakzai | Member |
| 7. Mst: Nabila Naz, ADEO District Orakzai | Member |
| 8. Mr. Shakeel Ahmad, SST GHS Swaro Koi | Member |
| 9. Mr. Wahid Ullah, SCT GMS Bagara Mishti | Member |

The meeting started with recitation from the Holy Quran. The Chair welcomed the participants. The following items were discussed in detail by the DPC keeping in view all the aspects of the case and finally unanimously recommended the promotion of the following teachers on the vacant post with immediate effect.

Item No 1 **PROMOTION OF PST/SPST/PSHT (MALE) FROM TO CT BPS-15 ON REGULAR BASIS.**

The case of promotion of PST/SPST/PSHT (Male) to CT BPS-15 against vacant posts was considered and the DPC recommended as under:-

Total NO of CT (M) vacant post	60
50% share of PST/SPST/PSHT Posta	36
Share of promotion 100%	36
Net to be promoted	36
Available for promotion	36
Recommended for promotion to CT	36

S. L. No.	Name of teacher	DP S.	Date of Birth	Re. date Service	Name of Post	Remarks
1	Zunoor Ali	15	05/02/1970	01/03/1993	GPS Noor Ali Garhi	
2	Amal Husson	15	01/08/1970	23/03/1995	GPS Garhi Afant Khel	
3	Hussainullah	15	13/02/1972	31/03/2001	GPS Khanwas Khel	
4	All Majum	15	05/03/1979	01/09/2003	GPS Sarka Aakiel	
5	Yasin Qiloh	15	03/01/1980	01/09/2003	GPS Sarka Mishi	
6	Ahmadwar Shah	15	10/03/1983	01/10/2003	GPS Sarka Khel	
7	Abdul Shakoor	15	07/03/1972	23/10/2003	GPS Sama Mamool	
8	Samar Gul	15	01/01/1979	29/07/2004	GPS Sangra	
9	Khalid ur Rahman	15	05/06/1979	03/09/2004	GPS Tarapi Ali Khel	
10	Ahmadwar Umar	15	25/04/1976	03/09/2005	GPS Ramhic Salal	
11	Mir Asghar	15	16/11/1984	05/09/2005	GPS Khanger Baor	
12	Wahed Ullah	15	02/03/1979	23/10/2005	GPS Biland Khel No.3	
13	Iqbal Hussain	12	03/05/1985	24/11/2009	GPS Star Sain	
14	Khalid ur Rahman	12	01/03/1986	24/11/2009	GPS Mir Kalam Khel	
15	Yaqub Ahmadwar	12	09/05/1987	24/11/2009	GPS Malang parhi	
16	Hamid Nawab	12	21/12/1982	24/11/2009	GPS Badi Shakhani	
17	Behman	12	05/11/1985	24/11/2009	GPS Gul Chert	
18	Gul Koram	12	15/01/1982	03/12/2009	GPS Bilazwi	
19	Dul Shah	12	04/04/1980	24/11/2009	GPS Bazed Khel	
20	Muhammad Rehman	12	20/05/1984	24/11/2009	GPS Jaha Koda	
21	Gul Hayim	12	05/04/1979	24/11/2009	GPS Karapa Samana	
22	Ashraf Ali	12	15/05/1985	24/11/2009	GPS Khar Khushia	
23	Ahmed Khan S Khadun	12	10/04/1984	02/12/2009	GPS Toor Kani	
24	Hussain	12	03/05/1985	24/11/2009	GPS Shamer	
25	Baqer Akbar Hussain	12	15/02/1982	24/11/2009	GPS Zakhun	
26	Asghar Ahmadwar	12	10/02/1981	24/11/2009	GPS Palanzi	
27	Kamran	12	10/05/1986	24/11/2009	GPS Injaur	
28	Shahid Hussain	12	09/02/1987	24/11/2009	GPS And Khel Bahi	
29	Amjad Khan Saqib	12	15/02/1985	23/11/2009	GPS Harapi Ali Khel	
30	Ishan	12	20/04/1986	24/11/2009	GPS Panjani Ali Khel	

S. No	SL #	Name of Teacher	BPS	Date of birth	Regular service	Current school	Name of the school where posted
1)	36	Zeenat Ali	15	05/02/1970	01/03/1993	GPS Naar Ali Ghari	GMS Mirazai
2)	65	Amal Hassan	15	01/08/1970	23/05/1995	GPS Ghari Mani Khel	GHSS Kalaya
3)	126	Hasan Ullah	15	13/02/1972	31/03/2001	GPS Khawas Khel	GMS Taali Bagh Ghari
4)	159	AE Majan	15	05/03/1979	01/09/2003	GPS Sarkd Akhe	GPS Mishi Bazar
5)	160	Yasin Ullah	15	02/01/1980	01/09/2003	GPS Sari Mishi	GHS Iner Palai
6)	161	Munawar Shah	15	10/03/1982	01/10/2003	GPS Sarki Khel	GPS Dran Sheikah
7)	166	Abdul Shakoor	15	01/03/1972	23/10/2003	GPS Sama Mamazai	GHS Misi Babar
8)	169	Samar Gul	15	01/01/1979	29/07/2004	GPS Sahgra	GMS Sarki Khel
9)	170	Khair Ul Rehman	15	05/06/1979	03/08/2004	GPS Tarapi Ali Khel	GHS Gulstan
10)	178	Muhammad Umar	15	22/04/1976	03/09/2006	GPS Rambia Sold	GPS Sarki Khel
11)	218	Malik Asghar	15	16/01/1984	05/09/2005	GPS Khangr Baba	GHS Bidand Khel
12)	219	Waheed Ullah	15	02/02/1979	23/10/2005	GPS Biland Khel No 2	BMS Sari Sam
13)	277	Ibar Hussain	12	05/05/1985	24/11/2009	GPS Sler Sam	GHS Bidand Khel
14)	278	Khaishta Jan	12	01/03/1986	24/11/2009	GPS Malang Ghari	GMS Sari Sam
15)	279	Muhammad Yaqoob	12	09/03/1979	24/11/2009	GPS Bara Sheikahn	GMS Qasim Khel Orakzai
16)	280	Muhammad Hanif	12	21/12/1982	24/11/2009	PGS Gul Cheri	GMS Yakha Kandow
17)	282	Naeab Ur Rehman	12	05/10/1985	24/11/2009	GPS Bilzawai	GHS Mishi Babar
18)	283	Gul Karim	12	15/01/1982	03/12/2009	GPS Bazed Khel	GMS Bader Laki
19)	284	Dalil Shah	12	01/04/1980	24/11/2009	GPS Bazed Khel	GMS Safri Feroz Khel
20)	285	Mati Ur Rehman	12	20/05/1984	24/07/2009	GPS Jaba Kada	GHS Aul Mela
21)	287	Gul Rahim	12	05/04/1979	27/11/2009	GPS Karapa Samana	GHS Gulstan
22)	288	Ashlaa Ali	12	18/03/1985	24/11/2009	GPS Khar Khushia	GMS Khail Sepoy (Khural)
23)	289	Maskeen Khan	12	10/04/1984	02/12/2009	GPS Toor Kani	GMS Domber Lasti
24)	290	S. Khadim Hussain	12	03/05/1985	24/11/2009	GPS Shamer	GHS Dran Sheikhan
25)	291	Raees Akbar	12	16/02/1982	24/11/2009	GPS Zakhian	GMS Khail Sepoy
26)	283	Husain Asghar	12	10/02/1981	24/11/2009	GPS Palosi	GHS Saif Dhara
27)	225	Munwar Khan	12	10/05/1986	24/11/2009	GPS Injavar	GMS Zera
28)	298	Sherin Hassan	12	09/01/1987	24/11/2009	GPS And Khel Bala	GMS Unki
29)	300	Amjad Khan	12	18/02/1985	24/11/2009	GPS Opl ALI Khel	GMS Aiwarha
30)	302	Said Ul Islam	12	20/04/1986	24/11/2009	GPS Panjama Ali Khel	GHS Swara Khel

No.	Roll No.	Name	Age	Date of Birth	Date of Joining	GPS No.
12	304	Hafiz Khan	12	03/10/1981	24/11/2009	GPS Khailzal No.1
13	305	Abbas Khan	12	02/10/1981	24/11/2009	GPS Swara Kot
14	306	Abbas Khan	12	23/10/1982	24/11/2009	GPS Chappar Mishli
15	307	Abbas Khan	12	26/12/1985	24/11/2009	GPS Kot Ali Khat
15	308	Pakshi Khan	12	13/07/1984	25/11/2009	GPS Yusuf Khail
16	312	Israjil Khan	12	12/03/1986	24/11/2009	GPS Khailzal No.2

No. of PST/SPST/PSHT (Male) to CT cleared for promotion = 36
 No. of CT (male) deferred for promotion = NIL

The meeting ended with a vote of thanks to and from the chair.

1. Wahid Ullah
 SCT GMS Bagara Mishli
 Member

2. Shakaal Ahmad
 SST GHS Swara Kot
 Member

3. Mr. Abdul Malik
 ADEO Orakzai
 Member

4. Kausar Ali
 ADEO Orakzai
 Member

5. Mrs. Nabila Naz
 ADEO Orakzai
 Member

6. Muhammad Iqbal (HM)
 GHS Mishli Bazar
 Member

7. Mr. Rais Khan
 ADEO Orakzai
 Member

8. Saif Ullah Principal
 GHS Mandail
 Member

9. Haris Ullah Khan
 Additional Director NMD
 KP E&SED Representative

Mr. Haris Ullah Khan
 District Education Officer Orakzai
 (Chairman)

31)	323	Amir Ur Rehman	12	03/10/1972	24/11/2009	GPS Khandi Zai No 1	GHS Swara Khel
32)	304	Hikmat Khan	12	02/10/1983	24/11/2009	GPS Sawara Khel	GMS Baera Khel
33)	306	Munawar Khan	12	25/10/1982	24/11/2009	GPS Koi Ali Khel	GMS Damber Khe
34)	307	Muhamnad Ghani	12	26/02/1985	24/11/2009	GPS Yousaf Khel	GHS Bagh Nak
35)	308	Painda Khan	12	13/04/1984	25/11/2009	GPS Khadi zai	GMS Dana Khula
36)	312	Isrial Khan	12	12/05/1986	24/11/2009	GPS Khadi Zai No 2	

No of PST/SPST/PSHT (Male) to CT cleared for promotion
No of CT (Male) deferred for promotion

36
Nil

The meeting ended vote of thanks to and form the chair.

- | | |
|---|--|
| 1. Wahid Ullah,
SCT GMS Bagara Mishti
Member | 2. Shakeel Ahmad
SST GHS Swaro Koi
Member |
| 3. Mr. Abdul Malik
ADEO District Orakzai
Member | 4. Kausar Ali
ADEO District Orakzai
Member |
| 5. Mst: Nabila Naz
ADEO District Orakzai
Member | 6. Muhammad Iqbal
GHS Mishti Bazar
Member |
| 7. Rasi Khan
ADEO District Orakzai
Member | 8. Saif Ullah Principal
GHS Mandai
Member |
| 9. Hameed Ullah Jan,
Additional District NMD
Member | |
| 10. Fareed Ullah Mehsud
District Education Officer
Chairman | |



OFFICE OF THE DISTRICT EDUCATION OFFICER- (M)-ORAKZAI
DISTRICT HEADQUARTER ORAKZAI AT BABER MELA-HANGU
Phone # 0925-690017 Fax # 0925-690017
Email: deorakzai2020@gmail.com

No. 1411 Dated 19/05/2023



OFFICE ORDER:

In compliance of the Directorate of Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar vide letter bearing No. 18811, dated 11-04-2023, the competent authority DEO (M) Orakzai is pleased to withdraw the promotion orders bearing Endst: No. 6660, dated 10-12-2020 in respect of the following twenty four promoted PSTs in BPS: 12 to the posts of CTs in BPS: 15 in District Orakza of the promotion order ibid. Furthermore, the following teachers are hereby adjusted in the schools mentioned against their names with immediate effect.

S#	NAME	CURRNT PLACE OF POSTING	PLACE OF ADJUSTMENT
1.	Iqbal Hussain	GMS Star Sam	GPS Bara Mela
2.	Khaista Jan	GMS Safri Feroz Khel	GPS Stara Kada
3.	Muhammad Yaqoob	GMS Yakho Kandow	GPS Sarki Khel
4.	Muhammad Hanif	GHS Mishli Bazar	GPS Bada Sheikhan
5.	Naseeb Rehman	GMS Babra Laaki	GPS Gul Cheri
6.	Gul Karim	GMS Safri Feroz Khel	GPS Ghutak All Khel
7.	Dall Shah	GHS Bazid Khel	GPS Rangin Khel
8.	Mati Ur Rehman	GHS Avi Mela	GPS Dago Takhtak
9.	Gul Rahim	GHS Gullstan	GPS Khee Kada No.1
10.	Ashfaq Ali	GMS Khalil Sepoy	GPS Bal Kot
11.	Maskeen Khan	GMS Damber Lasti	GPS Dran Sheikhan
12.	Syed Khadim Hussain	GHSS Andkheil	GMPS Shamer
13.	Raees Akbar	GMS Wampanra	GPS Kagnai Sher Khel
14.	Hussain Asgher	GMS Khalil Sepoy	GPS Khar Khusha
15.	Minawar Khan	GHS Safal Darrah	GPS Arkho Killi
16.	Shiren Hassan	GMS Mirako Payan	GPS Suleman Khel
17.	Amjad Khan	GMS Zanka Khel	GPS Tagnal
18.	Saqib Ul Islam	GHS Jarma District Kohat	Will be adjusted as and when the inter district transfer is withdrawn by the Directorate of Elementary & Secondary Education Khyber Pakhtun Khwa
19.	Amir ur Rehman	GHS Swaro Kot	GPS Swaro Kot
20.	Hikmat Khan	GHS Swaro Kot	GPS Khadizal No.1
21.	Munawar Khan	GHS Chapper Mishli	GPS Zor Chapper
22.	Muhammad Ghani	GMS Stara Kada	Kot All Khel
23.	Palinda Khan	GHS Baghnak	Ghutak All Khel
24.	Israfil Khan	GMS Dana Khula	GPS Taropi All Khel

Note:

- 1) Fresh charge report in their original Basic Pay Scales as on 09-12-2020 should be submitted to all concerned within 15 days positively. In case of failure/refusal, they will be treated under the Khyber Pakhtunkhwa Govt. Servants (Efficiency & Discipline) Rules, 2011.
- 2) TA/DA is not allowed for joining of their duties.

DISTRICT EDUCATION OFFICER (MALE)
DISTRICT ORAKZAI

Copy of Even No. & Date:

Copy forwarded for information and necessary action to the:-

- 1) Director Elementary and secondary Education Khyber Pakhtunkhwa Peshawar with the request to withdraw inter District transfer order in r/o S# 18, already transferred to District Kohat vide Directorate of E&SE KP No. 13656-61/F.No 51 Transfers Dated Peshawar the 27/12/2022.
- 2) Additional Director (Estab), Directorate of E&SE, MAs, Peshawar.
- 3) District Education Office (M), District Kohat
- 4) District Monitoring Officer, EMA, District Orakzai.
- 5) District Accounts Officer, District Orakzai.
- 6) Deputy DEO (M), Orakzai.
- 7) Assistant Director (Estab), Directorate of E&SE, KP, Peshawar vide his office letter quoted above.
- 8) Principal/Head Masters/Incharge HM and Head Teachers concerned.
- 9) SDEOs concerned for further necessary action.
- 10) Superintendent/Pay Clerk O/O the DEO (M) Orakzai for further necessary actions.
- 11) Focal Person (HRMIS) for necessary action.
- 12) PSTs concerned
- 13) Office Copy

DISTRICT EDUCATION OFFICER (MALE)
DISTRICT ORAKZAI



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION, KHYBER PAKHTUNKHWA, PESHAWAR
T. NO: 61/GENERAL TRANSFER

NO: 188/11 DATED: 11/04/2023

484 - 15 - 18

To
The District Education Officer,
Orakzai at Hangu.

Subject: - INTER DISTRICT TRANSFER FROM DISTRICT ORAKZAI TO DISTRICT HANGU

I am directed to refer to this Office letter No. 14585 Dated 11-01-2023, on the subject cited above and to state that from the perusal of the Promotion Order, Mr. Israfeel Khan S/O Gulzar Shah PST (BS-12) including 23 others were promoted to the post of CT (BS-15) vide No. 6661-69 Dated 10-12-2020, which is clear cut violation of Service Rules, 2012.

In this regard, I am further directed to ask you to withdraw the Promotion Order of the mentioned CT, including 23 others earlier notified vide Dated 10-12-2020, as well as such like cases, if any, and compliance report may be shared with this Office, please.

Assistant Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa

Encls: No. _____

Copy of the above is forwarded to the
1. PA to Director Elementary and Secondary Education, Khyber Pakhtunkhwa

Assistant Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa

Wahidullah
10/11/23

Better Copy

Page No. 15-

DIRECTORATE OF ELEMENTARY &
SECONDARY EDUCATION KHYBER
PAKHTUNKHWA

To

The District Education Officer,
Orakzai at Hangu.

Subject:-

INTER DISTRICT TRANSFER FROM DISTRICT ORAKZAI TO
DISTRICT HANGU

I am directed to refer to this Office Letter No 14585 dated 11/01/2023 on the subject cited above and to state that from the perusal of the Promotion Order, Mr. Israfeel Khan S/o Gul Aari Shah, PST (BS-12) including 23 others were promoted to the post of CT (BS-15) vide No 6661-69 dated 10/12/2020, which is clear cut violation of Service Rule, 2012.

In this regard; I am further directed to ask you to withdraw the Promotion Order of the mentioned CT, including 23 others earlier notified vide dated 10/12/2020 as well as all such like cases, if any, and compliance report may be shared with this office, please.

Assistant Director (Estab)
Elementary & Secondary Education
Khyber Pakhtunkhwa.

Endst: No _____

Copy of the above is forwarded to the

1. P.A to Director Elementary & Secondary Education, Khyber Pakhtunkhwa.

Assistant Director (Estab)
Elementary & Secondary Education
Khyber Pakhtunkhwa.



-16-

-2-

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) ORAKZAI
DISTRICT HEADQUARTER ORAKZAI AT BABER MELA HANBU
Phone: # 0925-690017; Fax: # 0925-690017
Email: deorakzai2020@gmail.com



No. S.L.H. Dated: 29/05/23

To: Director,
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.

Subject: REQUEST FOR REVIEW/APPRaisal

Reference to the Assistant Director (Estab), Elementary & Secondary Education, Khyber Pakhtunkhwa office letter bearing No. 18811, dated 11/04/2023, wherein it is has been directed to withdraw the promotion order of twenty four/24 PSTs BPS: 12 to CT BPS: 16 in District Orakzai issued vide Notification of this office bearing No. 6660, dated 10-12-2020 to the extent of Serial No. 13 to 36, twenty four/24 in counting.

Foregoing in view of the above, the aforesaid twenty four/24 PSTs in BPS: 12 have been promoted to the post of CT BPS: 16 in District Orakzai by adhering the following criteria:

- 1) WHEREAS, the promoted PSTs have been appointed on 24/09/2009 as PST BPS: 12, hence having 11 years of continuous Govt. regular services during promotion in 2020.
- 2) WHEREAS, there are no sanctioned posts of SPST BPS: 14 for promotion of these PSTs.
- 3) WHEREAS, in case of availability of the sanctioned posts of SPST in BPS: 14, these promoted PSTs would have been eligible for promotion to the posts of SPST BPS: 14 prior to this promotion way back in 2014 as per service rules 2012.
- 4) WHEREAS, there was no other eligible willing senior candidate then the promoted PSTs for promotion to the posts of CT BPS: 15.
- 5) WHEREAS, 60 posts of CT in BPS: 15 (Male) in district Orakzai were lying vacant at the time of DPC in 2020 and those PSTs in BPS: 12 have been promoted under Service Rules 2012 the 60% share of SPS/PSHT to the posts of CT in BPS: 15.
- 6) WHEREAS, the promoted PSTs had already been served on the posts of CTs in BPS: 15 since 11/12/2020 and one of the promoted PST (Mr. Saqib ul Islam) has already obtained the inter district transfer/NOC and serving in District Kohat on the post of CT in BPS: 15.

In the light of above, letter issued by your esteemed office dated 11/04/2023 may be reviewed in the interest of public service and to avoid any litigation, please.

DISTRICT EDUCATION OFFICER (M)

Copy of Even No. & Date:

Copy forwarded for information and necessary action to the:

1. Deputy Commissioner, Orakzai.
2. Additional Director (Estab), Directorate of E&SE, MAs, Khyber Pakhtunkhwa, Peshawar.
3. Assistant Director (Estab), Directorate of E&SE, Khyber Pakhtunkhwa w.r.t. his office letter vide cited above.
4. Office Copy.

DISTRICT EDUCATION OFFICER (M)

OFFICE OF THE DISTRICT EDUCATION OFFICER-(M) ORAKZAI
DISTRICT HEADQUARTER ORAKZAI AT BABER MELA HANGU

To

Director Elementary & Secondary Educations
Khyber Pakhtunkhwa, Peshawar.

Subject REQUEST FOR REVIEW/APPRaisal.

Reference to the Assistant Director (Estab) Elementary & Secondary Education, Khyber Pakhtunkhwa Office Letter No 1881 dated 11/04/2023, wherein it has been directed to withdraw the promotion order of twenty four/24 PST BPS-12 to CT BPS-16 in District Orakzai issued vide Notification of this Office bearing No 660 dated 10/12/2020 to the extent at Serial No 13 to 36 twenty four/24 in counting.

Foregoing in view of the above, the aforesaid twenty four/24 PST in BPS-12 have been promoted to the post of CT BPS-15 in District Orakzai by adhering the following criteria.

- 1) WHEREAS, the promoted PSTs have been appointed on 24/09/2009 as PST BPS-12, hence having 11 years of continuous Govt. regular services during promotion in 2020.
- 2) WHEREAS, there are no sanctioned posts of SPST BPS-14 for promotion of these PSTs.
- 3) WHEREAS, in case of availability of sanctioned posts of PST in BPS-14 these promoted PSTs would have been eligible for promotion to the posts of SPST BPS-14 prior to this promotion way back in 2014 as per Service Rule, 2012
- 4) WHEREAS, there was no other eligible willing senior candidate then the promoted PSTs for promotion to the post of CT BPS-15.
- 5) WHEREAS, 60 posts of CT in BPS-15 (Male) in District Orakzai were lying vacant at the time of DPC in 2020 and those PSTs in BPS-12 have been under Service Rule, 2012 the 60% share of SPS/PSHT to the posts of CT in BPS-15.
- 6) WHEREAS, the promoted PSTs had already been served on the posts of CTs in BPS-15 since 11/12/2020 and one of the promoted PST (Mr. Saqib Ul Islam) has already obtained in inter district transfer/NOC and serving District Kohat on the post of CT in BPS-15.

In the light of above, letter issued by your esteemed office dated 11/04/2023 may be reviewed in the interest of public service and to avoid any litigation, please.

District Education Officer (M)
Orakzai

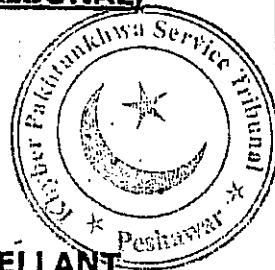
"D"

-17-

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR**

APPEAL NO. 1707 /2023

Mr. Dalil Shah, CT (BPS-15),
GMS Mir Meta Sheikhan, District Orakzai.



..... APPELLANT

VERSUS

- 1- The Secretary Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 3- District Education Officer, District Orakzai.

..... RESPONDENTS

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED ORDER DATED 19.05.2023 WHEREBY THE PROMOTION ORDER DATED 10.12.2020 OF THE APPELLANT HAS BEEN WITHDRAWN AND AGAINST THE APPELLATE ORDER DATED 09-08-2023 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT HAS BEEN REGRETTEED ON NO GOOD GROUNDS.

PRAYER:

That on acceptance of this appeal the impugned order dated 19.05.2023, and the Appellate order 09.08.2023 may very kindly be set aside and the promotion order dated 10.12.2020 be restored with all back benefits. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

R/SHWETH:

ON FACTS:

1. That appellant was an employee of the respondent Department and performing his duty with full zeal & zest and up to the entire satisfaction of his high ups.
2. That the appellant being qualified was appointed as PST on 24.11.2009, in the respondent department and since then they are working with the full zeal and zest.
3. That it is pertinent to mention here that 60 number of posts of CT (BPS-15) were laying vacant in the District Orakzai. That a DPC was held to fill up the subject posts and amongst these posts 36 number of posts were allocated to the quota of PST/PSHT/SPST. That a DPC meeting was held on 14.10.2020 wherein the appellant was recommended for the post of CT (BPS-15) and vide notification

ATTESTED

SECRETARY
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

-18-

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR



Service Appeal No. 1685/2023

BEFORE: MR. KALIM ARSHAD KHAN ... CHAIRMAN
MRS. RASHIDA BANO ... MEMBER (J) . . .

Mr. Naseeb Rehman, CT (BPS-15) GMS Babra Laaki, District Orakzai.
.... (Appellant)

VERSUS

1. The Secretary Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
 2. The Director Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
 3. District Education Officer, District Orakzai.
- (Respondents)

Mr. Noor Muhammad Khattak
Advocate ... For appellant

Mr. Muhammad Jan
District Attorney ... For respondents

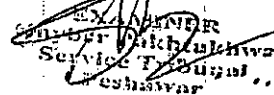
Date of Institution.....06.06.2023
Date of Hearing.....08.01.2024
Date of Decision.....08.01.2024

JUDGMENT

Rashida Bano, Member (J): The instant service appeal has been instituted under section 4 of the Khyber Pakhtunkhwa Service Tribunal, Act 1974 with the prayer copied as below:

“On acceptance of this appeal the impugned order dated 19.05.2023 and the appellate order 09.08.2023 may very kindly be set aside and the promotion order dated 10.12.2020 be restored with all back benefits. Any other remedy which this Tribunal deems fit that may also be awarded in favor of the appellant.”

ATTESTED


MEMBER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

2. Through this judgment we intend to dispose of instant service appeal as well as twenty-three connected service appeals which are given as under:

1. Service Appeal No.1686/2023
2. Service Appeal No.1687/2023
3. Service Appeal No.1688/2023
4. Service Appeal No.1689/2023
5. Service Appeal No.1690/2023
6. Service Appeal No.1691/2023
7. Service Appeal No.1692/2023
8. Service Appeal No.1693/2023
9. Service Appeal No.1694/2023
10. Service Appeal No.1695/2023
11. Service Appeal No.1696/2023
12. Service Appeal No.1697/2023
13. Service Appeal No.1698/2023
14. Service Appeal No.1699/2023
15. Service Appeal No.1700/2023
16. Service Appeal No.1701/2023
17. Service Appeal No.1702/2023
18. Service Appeal No.1703/2023
19. Service Appeal No.1704/2023
20. Service Appeal No.1705/2023
21. Service Appeal No.1706/2023
22. Service Appeal No.1707/2023
23. Service Appeal No.1708/2023

In view of common questions of law and facts, the above captioned appeals are being disposed of by this order.

3. Brief facts leading to filing of the instant appeals are that the appellants were serving as PSTs. That different posts of Certified Teacher (BPS-15) were lying vacant and accordingly, the appellants were given promotion against the said posts vide Notification dated 14.10.2020. That in pursuance of the said notification, they started performing duties in BPS-15. That all of a sudden on 19.05.2023, the said notification was withdrawn by the respondent department.

ATTESTED
MEMBER
Service Tribunal
Peshawar

Feeling aggrieved, they filed departmental appeals which were rejected on 09.08.2023, hence, the instant service appeals.

4. We have heard learned counsel for the appellants and Mr. Muhammad Jan, District Attorney for the respondents and have gone through the record and the proceedings of the case in minute particulars.

5. Learned counsel for the appellants argued that the impugned order dated 19.05.2019 was against law, facts and norms of justice, hence not tenable. He submitted that the appellants had not been treated in accordance with law/rules and as such, they had violated Articles-4 & 25 of the Constitution of Islamic Republic of Pakistan, 1973. Further submitted that no show cause notice had been served upon the appellants before passing of the impugned order; that no right of defense had been provided to the appellants and under the principle of *Locus Poenitentiae*, the respondents were not duty bound to withdraw the promotion. Lastly, he concluded that no inquiry had been conducted into the matter and the respondents had acted in arbitrary manner, therefore, he requested for acceptance of the instant service appeals.

6. Conversely, learned District Attorney submitted that the appellants had been treated in accordance with law, rules and policy. He submitted that there was no rules/policy of promotion of PST to the post of CT, therefore, the respondents had rightly withdrew the promotion orders. Further submitted that the impugned order was rightly passed and the appellants were treated in accordance with law,

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

rules and policy in vogue. Therefore, he requested for dismissal of the instant service appeals

7. Perusal of record reveals that appellant was appointed as Primary School Teacher vide order dated 23.11.2009 in Education Department. Sixty posts of Certified Teacher (BPS-15) were lying vacant out of which 36 were allocated to the quota of PST/SPST/PSHT. DPC meeting was held on 14.10.2020 wherein appellant was also recommended for promotion, who accordingly promoted. After promotion, all of a sudden respondent No.3 was asked to withdraw the promotion orders of the appellant vide letter dated 11.04.2023 and resultantly promotion order of the appellant was withdrawn vide order dated 19.05.2023 without any reason. Respondent contended that appellants were mistakenly promoted (who were PST) to the post of CT as under the rules there is no channel of promotion provided for promotion of PST to CT, therefore, promotion order was withdrawn in accordance with rules. Relevant rules are notified on 13.11.2012, wherein appendix to the schedule provides method of recruitment, qualification and other conditions specified reveals that the post of Certified Teacher (G) BPS-15 is mentioned at serial No.13 of the appendix in accordance with which criteria for appointment given in column No.5 the method of recruitment is;

- a) Forty percent by initial recruitment and.
- b) Sixty percent by promotion on the basis of seniority cum fitness, from amongst the Primary School Head Teacher with at least five year

ATTESTED
 MEMBER
 Khyber Pakhtunkhwa
 Service Tribunal
 Peshawar



service and having qualification prescribed for initial recruitment of Certified Teacher (General). Provided that if no suitable candidate is available amongst the Primary School Head Teacher for transfer then the post will be filled by the promotion on the basis on seniority and fitness, from amongst Senior Primary School Teacher, with at least five year service and having qualification prescribed for initial recruitment of Certified Teacher (General).

8. So as per Service Rules only Primary School Head Teacher with at least five year service having Bachelor Degree or qualification from a recognized University with Certified Teacher Certificate or two year years Associate Degree in Education from a recognized University or Eighteen months Diploma in Education can be promoted to the post of CT (General) and if no suitable PSHT is available then Senior Primary School Teacher on the basis of seniority cum fitness with at least five year service and qualification mentioned above will be promoted in alternative and not PSTs. Admittedly appellants were Primary School Teachers at the time of their promotion to the post of CT vide notification dated 10.12.2020. As per rules mentioned above, PSTs are not entitled for promotion to the post of CT rather as per Serial No. 20 of the appendix, Primary School Teacher will be promoted to the post of Senior Primary School Teacher on the basis of seniority cum fitness and Senior Primary School Teachers on basis of seniority cum fitness will be promoted to the post of Primary School Head Teacher in accordance with Serial No. 19 of the appendix of notification dated 13.11.2012.

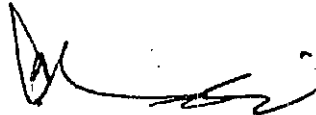
ATTESTED

EXAMINER
Kishor Pakhtikhwa
Service Tribunal
Jodhpur

9. Appellants being PSTs were erroneously and mistakenly promoted to the post of CT (BPS-15) by the respondents vide notification dated 14.10.2020 which was subsequently realized by the department who reverted the appellants back to the post of PST (BPS-12) from CT (BPS-15) by withdrawing promotion order dated 10.12.2020 vide impugned notification dated 19.05.2023. When in the rules there is no provision/channel for promotion of PST to CT (General) then promotion order of appellants being PSTs to the post of CT (BPS-15) was rightly withdrew by the departments respondent. It is also important to note that appellant served for this intervening period of from 10.12.2020 till 19.05.2022 almost two and half year as Certified Teacher (G), therefore, salaries and benefits paid to the appellants could not be recovered from them being past and close transaction on the principle of '*locus poenitentiae*' and estoppel on the part of respondents. Reliance is placed on 2020 SCMR 188.

10. For what has been discussed above, we are unison to dispose of the instant service appeal as well as connected service appeals with the observation that benefits paid to them could not be recovered from them. Costs shall follow the event. Consign.

11. *Pronounced in open court at Peshawar and given under our hands and seal of the Tribunal on this 8th day of January, 2024.*


(KALIM ARSHID KHAN)
Chairman


(RASHIDA BANO)
Member (J)

No. 1510Dated: 17/1/2018

Working Papers for Departmental Promotion of PST B-12 to Senior PST B-14

DPC NO.14

Total No. of PTC Posts (Duly verified from AAO)

535

No. of GPS Schools

272

No. of PTC Teachers to be promoted to BPS 14

15

Net to be promoted

15

Proposed for promotion

15

Subject:


List of PTC (Male) for Promotion BPS12- to BPS-14

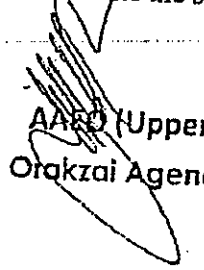
S#	S.L#	Name of Official	Father's Name	Acad: Qual:	Prof: Qual:	BPS	Date of Birth	Date of 1 st Appointment	Date of Charge As PTC	Trained W.E.F.	Awarded BPS	Present Post
1	312	Riswan Khan	Gul Samand	FA	PTC	12	22/06/1969	22/10/2005	24/10/2005	24/10/2005		
2	313	Waris Ali	Syed Asker	FA	PTC	12	04/05/1977	22/10/2005	24/10/2005	24/10/2005	14	GPS Oblan
3	314	Fazal Amin	Pir Bat Khan	BA	PTC	12	12/07/1981	28/08/1999	27/10/2005	27/10/2005	14	GPS Sara Khawa
4	315	S.Azizul Hassan	S.Sabti Hassan	FA	PTC	12	14/03/1973	16/11/2005	16/11/2005	16/11/2005	14	GPS Nareek No.2
5	317	Khan Wazir	Alim Haider	BA	PTC	12	01/01/1974	23/11/2009	24/11/2009	24/11/2009	14	GPS Abi Shal
6	318	Fozal Bari	Ahmed Jamil	FA	PTC	12	05/02/1978	23/11/2009	24/11/2009	24/11/2009	14	GPS Nari Garhi
7	319	Gul Rahim	Abdul Ahad	BA	PTC	12	05/04/1979	23/11/2009	24/11/2009	24/11/2009	14	GPS Khawas Khel
8	320	Rait Khan	Akram Khan	FA	PTC	12	02/10/1979	23/11/2009	24/11/2009	24/11/2009	14	GPS Ghuz Garh
9	321	Dalil Shah	Makhminat Shah	MA	B.Ed	12	04/04/1980	23/11/2009	24/11/2009	24/11/2009		
10	322	Abdul Halim	Habib Ur Rehman	BA	PTC	12	05/06/1980	23/11/2009	24/11/2009	24/11/2009	14	GPS Bazed Khel
11	323	Momin Shah	Khalid Shah	FA	PTC	12	04/01/1982	23/11/2009	24/11/2009	24/11/2009	14	GPS Arghunja
12	324	Races Akbar	Khalid Wazir	BA	PTC	12	16/02/1982	23/11/2009	24/11/2009	24/11/2009	14	GPS Kagnai Sher Khel
13	325	Amir Rehman	Wazir Bad Shah	FA	PTC	12	03/10/1982	23/11/2009	24/11/2009	24/11/2009	14	GPS Zakhlan
14	326	Munawar Khan	Azam Khan	FA	PTC	12	25/10/1982	23/11/2009	24/11/2009	24/11/2009	14	GPS Khadizai No.1
15	327	Serab Ali	Mashrab Ali	FA	PTC	12	05/12/1982	23/11/2009	24/11/2009	24/11/2009	14	GPS Chapper Mishki
												14 GPS Bari Khel

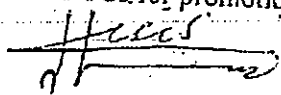
24

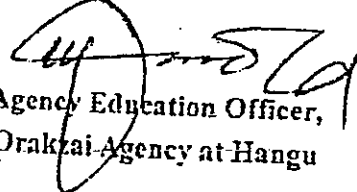
- (a) have been completed the required length of qualifying service and qualification as required for promotion to BPS-14 under the rules.
- (b) Non of them is on deputation to any organization under the Federal/Provincial/Autonomous/Semi autonomous/International organization.
- (c) Neither any disciplinary/departmental proceeding/Anti-corruption/Judicial inquiry is pending against them nor has any penalty been imposed upon anyone of them during the last five years.
- (d) No one is on long leave/Ex-Pakistan leave.
- (e) Their ACRs synopsis are free from adverse remarks.
- (f) They are all alive and serving.
- (g) Their appointment orders against PTCs posts are attached herewith.
- (h) The Seniority list of B-14 officials is final, undisputed and not subjudice.
- (i) The departmental promotion committee is requested to determine the suitability of the above PTCs for promotion to BPS-14 with immediate effect

Verified by:


AAEO (Central)
Orakzai Agency


AAEO (Upper)
Orakzai Agency


AAEO (Lower)
Orakzai Agency


Agency Education Officer,
Orakzai Agency at Hangu

-25-

No: 322

2-1-2017 Combined

Date:

Final 16 SPST(M) Teacher are hereby held in BPS 14 After DPC 11.

S#	Name of Official	Father's Name	Acad: Qual:	Prof: Qual:	BPS	Date of Birth	Date of 1 st Appointment	Date of Charge As PTC	Trained W.E.F.	BPS	Present Post
1.	Daud Khan	Abdur Rehman	FA	PTC	12	04/04/1965	15/05/1984	16/05/1984	31/05/1987	14	GPS Sangra Mishri
2.	Mohammad Asker	Hazrat Khan	FA	PTC	12	03/02/1970	30/09/1989	10/10/1989	14/11/1990	14	GPS Sangra Mishri
3.	Khana Din	Talib Din	FA	PTC	12	03/03/1966	06/06/1994	07/06/1994	09/01/1995	14	GPS Lado Ghari
4.	Syed Basar Hussain	S.Aqeel	FA	PTC	12	02/04/1970	01/08/1989	01/08/1989	09/01/1995	14	GPS Asi Khelo Akhpa
5.	Mohammad Sattar	Abdul Ghafar	FA	PTC	12	06/08/1970	03/10/1995	04/10/1995	25/05/1996	14	GPS Jalo
6.	Mohammad Ayaz	Fozal Ur Rehman	FA	PTC	12	13/03/1972	06/06/1994	08/06/1994	25/05/1996	14	GPS Badama
7.	Khana Jan	Janan Khan	FA	PTC	12	06/01/1974	15/10/1995	16/10/1995	25/05/1996	14	GPS Oal Mela
8.	Anayat Ali	Rehmal Shah	FA	PTC	12	03/01/1974	06/11/1994	08/11/1994	11/05/1999	14	GPS Landaka
9.	Mohammad Shoib	Khial Wazir	FA	PTC	12	20/04/1976	06/11/1994	10/11/1994	11/05/1999	14	GPS Yousaf Khel
10.	Hafizur Rehman	Abdur Rehman	FA	PTC	12	25/09/1976	09/09/2002	11/09/2002	11/09/2002	14	GPS Karbagha
11.	Umar Farooq	Ghulam Habib	FA	PTC	12	01/02/1982	02/09/2005	03/09/2005	03/09/2005	14	GPS Arghonja
12.	Fazal Mir	Syed Shah	FA	PTC	12	05/04/1981	02/09/2005	04/09/2005	04/09/2005	14	GPS Chinor Ali Khel
13.	Waris Ali	Gul Jan	FA	PTC	12	07/03/1972	02/09/2005	05/09/2005	05/09/2005	14	GPS Sara Khuna
14.	Mir Asghar	Sowab Gul	FA	PTC	12	16/10/1984	02/09/2005	05/09/2005	05/09/2005	14	GPS Talay Akhel
15.	Waheedullah	Noon Bad Shah	FA	PTC	12	02/02/1979	22/10/2005	23/10/2005	23/10/2005	14	GPS Mir Kalam Khel
16.	Salahuddin	Ajmir Khan	FA	PTC	12	03/02/1980	22/10/2005	23/10/2005	23/10/2005	14	GPS Chapper Ali Khel

Member

Janat Khan (CT)
GHS Saifal Darrah
Orakzai Agency

Member

Shakil Ahmad (CT)
GHS Swaro Kot
Orakzai Agency

Chairman

Atiq ur Rahman
Agency Education Officer,
Orakzai Agency at Hangu

OFFICE OF THE AGENCY EDUCATION OFFICER, ORAKZAI AGENCY AT HANGU
Dated 27/01/2017

No. 308

Total No. of PTC Posts (Duly) 535
No. of GPS Schools 272
No. of PTC Teachers to be 10
Net to be promoted 10
Proposed for promotion 10

DPC 11

Subject: List of PTC (Male) for Promotion BPS12- to BPS-14

S#	Name of Official	Father Name	Academic Qualification	Prof. Quot	BPS	Date of Birth	Date of 1 st Appointment	Date of Charge As PTC	Trained W.E.F.	Awarded BPS	Present Post	Remarks
1.	David Khan	Abdur Rehman	FA	PTC	12	04/04/1965	15/05/1984	16/05/1984	31/05/1987	14	GPS Sangha Mandi	
2.	Khana Din	Talib Din	FA	PTC	12	03/03/1966	06/06/1994	07/06/1994	09/01/1995	14	GPS Sangha	
3.	Muhammad Asker	Hazrat Khan	FA	PTC	12	03/02/1970	25/09/1989	10/10/1989	14/11/1990	14	GPS Sangha Mandi	No Service Book
4.	Syed Basar Hussain	S. Aqeel	FA	PTC	12	03/04/1970	01/06/1989	01/05/1989	09/01/1995	14	GPS Sangha	
5.	Muhammad Saffar	Abdul Ghafar	FA	PTC	12	06/02/1970	03/10/1995	04/10/1995	25/05/1996	14	GPS Sangha	
6.	Muhammad Ayaz	Fazal Ur Rehman	FA	PTC	12	13/02/1972	06/06/1994	06/06/1994	25/05/1996	14	GPS Sangha	FA Result B-8-2015
7.	Anayat Ali	Rehmat Shah	FA	PTC	12	06/07/1974	06/11/1994	06/11/1994	11/05/1999	14	GPS Sangha	
8.	Khana Jar	Jagan Khan	FA	PTC	12	06/07/1974	15/10/1995	16/10/1995	25/05/1996	14	GPS Sangha	No Service Book
9.	Muhammad Shait	Khilal Wazi	FA	PTC	12	20/04/1975	06/11/1994	10/11/1994	11/05/1999	14	GPS Sangha	FA Result 26-12-2015
10.	Hafizur Rehman	Abdur Rehman	FA	PTC	12	25/09/1976	09/09/2002	11/09/2002	11/09/2002	14	GPS Sangha	

-27-

- (a) have been completed the required length of qualifying service and qualification as required for promotion to BPS-12 and Senior PTC B-14 under the rules.
- (b) Non of them is on deputation to any organization under the Federal/Provincial/Autonomous/Semi autonomous/International organization
- (c) Neither any disciplinary/departmental proceeding/Anti-corruption/Judicial inquiry is pending against them nor has any penalty been imposed upon anyone of them during the last five years.
- (d) No one is on long leave/Ex-Pakistan leave.
- (e) Their ACRs synopsis are free from adverse remarks.
- (f) They are all alive and serving.
- (g) Their appointment orders against PTCs posts are attached herewith.
- (h) The Seniority list of B-14 officials is final, undisputed and not subjudice
- (i) The departmental promotion committee is requested to determine the suitability of the above PTCs for promotion to BPS-14 with effect from 02/01/2017.

Member
Janat Khan (CT)
GHS Saital Darrah
Orakzai Agency

Member
Shakil Ahmad (CT)
GHS Swaro Kol
Orakzai Agency

Chairman
Aliq ur Rahman
Agency Education Officer,
Orakzai Agency at Hangu

-127-

OFFICE OF THE AGENCY EDUCATION OFFICER, ORAKZAI AGENCY AT HANGU

Dated 27/01/2017

No. 307

Total No. of PTC Posts (Duly verified from AAO)	535
No. of GPS Schools	272
No. of PTC Teachers to be promoted to BPS 15	10
Net to be promoted	10
Proposed for promotion	10

DPC NO 11

Subject: List of PTC (Male) for Promotion BPS14- to BPS-15

S#	Name of Official	Father's Name	Acad. Qual.	Prof. Qual.	BPS	Date of Birth	Date of 1 st Aptt.	Date of Charge As PTC	Trained W.E.F.	Awarded BPS	Present Post
1.	Mehmood Khalid	Nowab Khan	FA	PTC	14	12/10/1960	29/02/1992	01/03/1992	25/12/1993	15	GPS Baza Upper
2.	Aman Ali	Ansar Ali	FA	PTC	14	05/12/1971	07/11/1990	10/11/1990	04/01/1995	15	GPS Chaman-Jana
3.	Mohammad Islam	Mir Abdullah Shah	FA	PTC	14	14/01/1966	24/05/1987	25/05/1987	09/01/1995	15	GPS Spin Begi
4.	Laiq Khan	Sher Mohammad Khan	FA	PTC	14	15/02/1970	22/11/1989	02/12/1989	09/01/1995	15	GPS Mirazai
5.	Latif Khan	Fazal-Janan	FA	PTC	14	06/03/1971	22/11/1989	22/11/1989	09/01/1995	15	GPS Zaina Khel
6.	Afser Khan	Ilyas Khan	FA	PTC	14	04/05/1971	22/11/1989	02/12/1989	09/01/1995	15	GPS Zawan

28-

	Name of Official	Father's Name	Acad: Qual:	Prof: Qual:	BPS	Date of Birth	Date of 1 st Appt:	Date of Charge As PTC	Trained W.E.F.	Awarded BPS	
7.	Syed Rahman	Yar Shah	FA	PTC	14	20/06/1972	07/11/1990	12/11/1990	09/01/1995	15	GPS Naka Mela
8.	Sabir Mohammad	Jawani Mohammad	FA	PTC	14	05/05/1967	04/10/1995	05/10/1995	25/05/1996	15	GPS Malang Garhi
9.	Abdul Hakim	Habib Rennar	FA	PTC	14	14/03/1979	02/09/2005	03/09/2005	03/09/2005	15	GPS Sama Mamozai
10.	Zar Mili Ali	Nozli Ali	FA	PTC	14	15/03/1980	02/09/2005	03/09/2005	03/09/2005	15	GPS Sara Khawa

29-) have been completed the required length of qualifying service and qualification as required for promotion to BPS-14 and Senior PTC B-15 under the rules.

) Non of them is on deputation to any organization under the Federal/Provincial/Autonomous/Semi autonomous/International organization.

) Neither any disciplinary/departmental proceeding/Anti-corruption/Judicial inquiry is pending against them nor has any penalty been imposed upon anyone of them in the last five years.

) No one is on long leave/Ex-Pakistan leave.

) Their ACRs synopsis are free from adverse remarks.

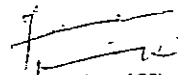
) They are all alive and serving.

) Their appointment orders against PTCs posts are attached herewith.

) The Seniority list of B-15 officials is final, undisputed and not subjudice.

) The departmental promotion committee is requested to determine the suitability of the above PTCs for promotion to BPS-15 with effect from 02/01/2017.

Member



Janal Khan (CT)

GHS Saifal Darrah

Orakzai Agency

Member



Shakil Ahmad (CT)

GHS Swaro Kot

Orakzai Agency

Chairman



Atiq ur Rahman

Agency Education Officer;

Orakzai Agency at Hangu

No, 5025/-
Final 16 SPST Teacher are hereby held in BPS 14

S#	Name of Official	Father's Name	Acad. Qual:	Prof. Qual:	Date of Birth	Appointment	Charge As PTC	Trained W.E.F.	BPS	Present Post
1.	Mehmood Khalid	Nawab Khan	FA	PTC	12/10/1960	29/02/1992	01/03/1992	25/12/1993	14	GPS Boza Upper
2.	Aman Ali	Ansar Ali	FA	PTC	05/12/1971	07/11/1990	10/11/1990	04/01/1995	14	GPS Shiraz Garhi
3.	Mohammad Aslam	Mir Abdullah Shah	FA	PTC	14/01/1966	24/05/1987	25/05/1987	09/01/1995	14	GPS Spin Begi
4.	Laiq Khan	Sher Mohammad	FA	PTC	15/02/1970	22/11/1989	02/12/1989	09/01/1995	14	GPS Mirozai
5.	Lalif Khan	Fazal Janan	FA	PTC	06/03/1971	22/11/1989	22/11/1989	09/01/1995	14	GPS Zaina Khel
6.	Alser Khan	Ilyas Khan	FA	PTC	04/05/1971	22/11/1989	02/12/1989	09/01/1995	14	GPS Zawan
7.	Syed Rahman	Yar Shah	FA	PTC	20/06/1972	07/11/1990	12/11/1990	09/01/1995	14	GPS Naka Mela
8.	Sabil Mohammad	Jawani Mohammad	FA	PTC	05/05/1967	04/10/1995	05/10/1995	25/05/1996	14	GPS Malang Garhi
9.	Abdul Hakim	Habibur Rehman	FA	PTC	14/03/1979	02/09/2005	03/09/2005	03/09/2005	14	GPS Samo Mamoza
10.	Zar Mir Ali	Nozir Ali	FA	PTC	15/03/1980	02/09/2005	03/09/2005	03/09/2005	14	GPS Sara Khawa
11.	Umar Farooq	Ghulam Habib	FA	PTC	01/02/1982	02/09/2005	03/09/2005	03/09/2005	14	GPS Arghanja
12.	Fazal Mir	Syed Shah	FA	PTC	05/04/1981	02/09/2005	04/09/2005	04/09/2005	14	GPS Chinor Ali Khel
13.	Waris Ali	Gul Jan	FA	PTC	07/03/1972	02/09/2005	05/09/2005	05/09/2005	14	GPS Sara Khuna
14.	Mir Asghar	Sawab Gul	FA	PTC	16/10/1964	02/09/2005	05/09/2005	05/09/2005	14	GPS Talay Akhel
15.	Waheedullah	Noon Bad Sh	FA	PTC	02/02/1979	22/10/2005	23/10/2005	23/10/2005	14	GPS Mir Kalam Khel
16.	Salahuddin	Ajmir Khan	FA	PTC	03/02/1980	22/10/2005	23/10/2005	23/10/2005	14	GPS Chopper Ali Khel

-30-

Member

Janat Khan (CT)
GHS Saifal Darrah
Orakzai Agency

Member

Shakil Ahmad (CT)
GHS Swaro Kol
Orakzai Agency

Chairman

Ali ur Rahman
Agency Education Officer,
Orakzai Agency of Hangu

18/12/16

-31-

OFFICE OF THE AGENCY EDUCATION OFFICER ORAKZAI AGENCY AT HANGU

No. 1285 / Date: 28/2/2018

Working Papers for Departmental Promotion of PST B-12 to Senior PST B-14

DPC NO.16

Total No. of PTC Posts (Not verified from AAO)

No. of GPS, Schools

No. of PTC Teachers to be promoted to BPS 14

Not to be provided


Proposed for promotion


515
272
3
3
3


List of PTC (Male) for Promotion BPS-12 to BPS-14

S.No.	Name of Official	Grade	Post	Qual.	Prob. Cn.	BPS	Date of Birth	Date of Appointment	Disc. Gr.	Transf.	Awarded BPS	Present Position
1	Sheel Hussain	PST	Senior Administrative	P-1	1	12	11/04/1964	02/04/1994	11-04/1998	01/01/1994	14	GIS Khan Khan Chingari
2	Mehar Gulish	PST	Senior Administrative	P-1	1	12	01/10/1969	04/09/1994	01/01/1994	13/05/1997	14	GIS Khan Khan Chingari
3	Mst. Nadeem Gul	PST	Senior Administrative	P-1	1	12	14/08/1973	12/07/1994	12/07/1998	17/07/1994	14	GIS Khan Khan Chingari

- (a) have been completed the required length of qualifying service and qualification as required for promotion to BPS-14 under the rules.
- (b) None of them is on deputation to any organization under the Federal/Provincial/Autonomous/Semi autonomous/International organization.
- (c) Neither any disciplinary/departmental proceeding/Anti-corruption/Judicial inquiry is pending against them nor has any penalty been imposed upon anyone of them during the last five years.
- (d) No one is on long leave/Ex-Pakistani leave.
- (e) Their AGRS synopsis are free from adverse remarks.
- (f) They are all alive and serving.
- (g) Their appointment orders against PTCs posts are attached herewith.
- (h) The Seniority list of B-14 officials is final, undisputed and not subject.
- (i) The departmental promotion committee is requested to determine the suitability of the above PTCs for promotion to BPS-14 with immediate effect.

Verified by: 
AAO (Central)
Orakzai Agency


AAO (Lower)
Orakzai Agency


Agency Education Officer,
Orakzai Agency at Hangu.

OFFICE OF THE AGENCY EDUCATION OFFICER, ORAKZAI AGENCY AT HANGI

No. 1389

Dated: 28/5/2018

Working Papers for Departmental Promotion of SPST B-14 to Senior PSHT B-15

Total No. of PTC Posts (Duly verified from AAO) 535

No. of GPS Schools 272

No. of PTC Teachers to be promoted to BPS 15 3

Net to be promoted 3

Proposed for promotion 3

DPC NO 16

Subject: List of PTC (Male) for Promotion BPS14 to BPS-15

Sl. No.	Name of Official	Father's Name	Acad. Qual.	Prof. Qual.	BPS	Date of Birth	Date of Appoint.	Date of Change of PTC	Present Post	Present Post
1	S. Iraj Hussain	S. Taslim Hussain	FA	PSST	14	14/03/1964	02/06/1988	11/02/1988	09/01/1991	15
2	Habibullah	M. A. Mohammad	FA	PSST	14	01/01/1969	30/03/1994	01/03/1994	13/05/1997	15
3	Mushtaq	Farid Ali	FA	PSST	14	14/02/1973	12/06/1997	19/09/1998	19/02/1998	15

- (a) have been completed the required length of qualifying service and qualification as required for promotion to BPS-14 and Senior PTC B-15 under the
- (b) Non of them is on deputation to any organization under the Federal/Provincial/Autonomous/Semi autonomous/International organizations
- (c) Neither any disciplinary/departamental proceeding/Anti-corruption/Judicial inquiry is pending against them nor has any penalty been imposed upon any of them during the last five years.
- (d) No one is on long leave/Ex-Pakistan leave.
- (e) Their ACRs synopsis are free from adverse remarks.
- (f) They are all alive and serving.
- (g) Their appointment orders against PTCs posts are attached herewith.
- (h) The Seniority list of B-15 officials is final, undisputed and not subjudice.
- (i) The departmental promotion committee is requested to determine the suitability of the above PTCs for promotion to BPS-15 in the order given.

Verified by:

[Signature]
AAEO (Central)
Orakzai Agency

[Signature]
Agent Education Officer
Orakzai Agency

-33-

OFFICE OF THE AGENCY EDUCATION OFFICER, ORAKZAI AGENCY, AT HANGU

No. 2879 Dated: 7/12/2018

Working Papers for Departmental Promotion of PSI B-12 to Senior PSI B-14

DPC NO. 17

Total No. of PTC Posts (Duly verified from AAO)

535

No. of GPS/Schools

272

No. of PTC candidates to be promoted to BPS-14

2

Not to be promoted

2

Proposed for promotion

2

Subject: List of PTC (Male) for Promotion BPS-12 to BPS-14

S. No.	Sl. No. Name of Official	Sl. No. Name of Official	Appd. Qual.	Prof. Qual.	BPS	Date of Birth	Date of filing Appointment	Date of Change as PTC	Married / WIFE	Annulment BPS	Present Post
95	Jerral Khan	Durrub Khan	F-1	PTC	12	04/09/1971	30/09/1989	12/10/1989	22/11/1992	14	GPS Mandail
150	Jamir Khan	Shaher Jan	F-1	PTC	12	17/05/1967	10/08/1989	11/08/1989	09/01/1995	14	GPS Lary

- (a) have been completed the required length of qualifying service and qualification as required for promotion to BPS-14 under the rules.
- (b) None of them is on deputation to any organization under the Federal/Provincial/Autonomous/Semi autonomous/International organization.
- (c) Neither is disciplinary/departmental proceeding/Anti-corruption/Judicial inquiry is pending against them nor has any penalty been imposed upon any one of them during the last five years.
- (d) No one is going/leave/s - Pakistan leave.
- (e) There is no suspension/leave from adverse remarks.
- (f) They are all alive and serving.
- (g) Their appointment orders against PTCs posts are attached herewith.
- (h) The seniority list of B-14 officials is final, undisputed and not subject to change.
- (i) The departmental promotion committee is requested to determine the suitability of the above PTCs for promotion to BPS-14 with immediate effect.

Verified by

[Signature]
AAEO (Lower)
Orakzai Agency

[Signature]
AAEO (Lower)
Orakzai Agency

[Signature]
Agency Education Officer
Orakzai Agency, at Hangu

-34-

OFFICE OF THE AGENCY EDUCATION OFFICER, ORAKZAI AGENCY AT HANGU

No. 9679 Dated: 21/8/2018

Working Papers for Departmental Promotion of SPST B-14 to Senior PSHT B-15

Total No. of PTC Passes (Duly Verified from AAO) 535

No. of GPS Schools 372

No. of PTC Teachers to be promoted to BPS 15 2

Not to be promoted 2

Proposed for promotion 2

DPC NO. 17

Subject: List of PTC (Male) for Promotion BPS14 to BPS-15

Sl. No.	Name of Candidate	Qualification	Grade	Age	DOB	Date of Birth	Designation	Date of Birth	Date of Birth	Final WTS	Remarks
95	Amjad Khan	B.A. (Hons.)	PA	20	14	04/07/1971	10/09/1989	12/06/1989	32/11/2002	15	GPS Mangal
96	Amjad Khan	B.A. (Hons.)	PA	20	14	04/07/1971	10/09/1989	12/06/1989	32/11/2002	15	GPS Mangal

- (a) Have been completed the required length of qualifying service and qualification as required for promotion to BPS-14 and Senior PTC B-15 under the rules.
- (b) None of them is on deputation to any organization under the Federal/Provincial/Departmental/Interdepartmental/Institutional/International organization.
- (c) Whether any disciplinary/departmental/procedural/anti-corruption/other orders or Pending cases are pending against them are being inspected upon response of them during the last five years.
- (d) He/she is on long leave/A-Pakistan leave.
- (e) That A/Cs symptoms are free from adverse remarks.
- (f) They are all alive and serving.
- (g) Their appointment orders against PTCs grade are attached herewith.
- (h) The Service List of B-15 available is final, unaltered and not subject to change.
- (i) The departmental/financial/qualitative requirements are requested to determine the suitability of the above PTCs for promotion to BPS-15 with immediate effect.

Verified by:

(Signature)
AAEO (Lower)
Orakzai Agency

(Signature)
AAEO (Lower)
Orakzai Agency

(Signature)
Agency Education Officer,
Orakzai Agency at Hangu

Agency Education Office
Orakzai Agency at Hangu

EX-POST FACTO

MINUTES OF THE MEETING OF THE COMMITTEE FOR UPGRADATION AND
PROMOTION OF TEACHERS TO PRIMARY SCHOOL HEAD TEACHER
POSTS AND OTHERS TO SENIOR QARHMI, PBS-15, ORAKZAI
AGENCY

In order to consider the up gradation and promotion cases of PST (M/F) to Primary School Head Teacher (M/F), PBS-15, Orakzai Agency, to Senior Qarhmi, PBS-15, in the light of notification No. 8235-60, dated 22/11/2010, a meeting of the committee was held in the office of the Agency Education Officer Orakzai Agency on 22/11/2010. The Agency Education Officer being Chairman presided the meeting.

Other members of the committee were as under:

1. Mr. Atiqur Rahman Agency Education Officer Orakzai Agency (Chairman)

2. Mr. Mullah Bahman (Member)

3. Mr. Mullah Khan (Member)

4. Mr. Saad Ahmad (Member)

The meeting was started with the recitation of the Holy Quran and the committee members and a prayer for the progress and prosperity of the country.

The agenda of the meeting was to consider the up gradation and promotion cases of PST (M/F) to Primary School Head Teacher (M/F), PBS-15, Orakzai Agency in the light of notification No. 8235-60, dated 22/11/2010, and to consider the up gradation and promotion cases of PST (M/F) to Senior Qarhmi, PBS-15, Orakzai Agency.

As per above said notification and DT, it was decided to promote senior school teachers post PBS-15 in each of the schools keeping in view the seniority, educational qualification, academic and professional records, etc. The committee members were divided into groups and the names of the teachers were written on the board. The committee members discussed the names of the teachers and decided to promote the teachers on the basis of 10 year required service plus seniority/fitness.

It was unanimously decided that in case of one or more teachers who were promoted to the post of primary school head teacher, PBS-15, for any reason, the names of the teachers will submit in written to the chairman of the committee, but if the one teacher, teachers found eligible for up gradation to the post of senior PST (PBS-14) then the chairman of the committee will consider him/her for that post.

The chairman of the committee shall refer the academics and professional records of the teachers promoted to the concerned Board of Intermediate and Secondary Education, District District and the benefits of the up gradation, promotion and seniority after the verification of documents of the up gradation promoted teachers.

The chairman of the committee will submit the list of the up gradation promoted teachers for 15 days for general information and observations will be called for.

Adjustment orders of up gradation promoted teachers will be issued after the completion of appeal of the respondents, any further work will be done after 15 days.

It is clarified that 15 teachers of Male, SBSI and NO-14 and 12 teachers of Female, SBSI and NO-14 have been sanctioned hereby.

The Meeting ended with a vote of thanks by the chairman.

(Chairman)

Atiq-ur-Rahman
Agency Education Officer,
Orakzai Agency at Hangu

(Member)
Muhib-ur-Rehman (DDE/ESTAB) FATA

(Member)
Janat Khan (CT),
GHS Salfai Darrah

(Member)
Shakil Ahmad (CT)
GHS Swara Kot

Copy forwarded for information to:
Director Education FATA Secretariat Peshawar
Political Agent Orakzai Agency
Agency Account Officer Orakzai Agency
AAEO's Concerned
Office record

New policy "F"

P.# 07, 11

Dated 06/08/2020

-37-

6

GOVERNMENT OF THE KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

NOTIFICATION

Peshawar, dated the November 13, 2012.

No.SO(PE)4-5/SRC/Meeting/2012/Teaching-Cadre:- In pursuance of the provisions contained in sub rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 and in supersession of all Notifications issued in this behalf, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department hereby lays down the method of recruitment, qualification and other conditions specified in the Appendix to this Notification which shall be applicable to all the posts specified in Column No. 2 of the said Appendix and the schedule therewith.

Endst. No. & Date as above.

Copy forwarded to:-

1. The Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department.
2. The Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department.
3. The Secretary to Govt. of Khyber Pakhtunkhwa, Law Department.
4. The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.
5. The Accountant General, Khyber Pakhtunkhwa Peshawar.
6. The Director (E&SE) Khyber Pakhtunkhwa Peshawar.
7. The Director Education (FATA), Peshawar.

SECRETARY TO GOVERNMENT OF THE KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

-38-

6
7

8. The Director Curriculum & Teachers Education Abbottabad.
9. The Director (PITE) Khyber Pakhtunkhwa Peshawar.
10. The Director ESRU, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
11. The Deputy Director Database(EMIS) E&SE Department.
12. All District Coordination Officers in Khyber Pakhtunkhwa.
13. All Exccutive District Officers Elementary & Secondary Education in Khyber Pakhtunkhwa.
14. All District Accounts Officers in Khyber Pakhtunkhwa /Agency Accounts Officers FATA.
15. All Agency Education Officers FATA.
16. P.S to Governor, Khyber Pakhtunkhwa.
17. P.S to Chief Minister, Khyber Pakhtunkhwa.
18. P.S to Chief Secretary, Khyber Pakhtunkhwa.
19. PS to Minister E&SE Khyber Pakhtunkhwa Peshawar.
20. PS to Secretary E&SE Department.
21. Master File.

Section Officer (Primary)

APPENDIX

S.No.	Nomenclature of the post.	Minimum qualification and experience for initial appointment or by transfer.	Age limit.	Method of recruitment.
1.	2.	3.	4.	5.
1.	Secondary School Teacher (BPS-16).	(i) Second class Bachelor's Degree with two subjects, as Chemistry, Botany, Zoology, Physics, Mathematics, Statistics Humanities and other equivalent groups from a recognized University; or (ii) M.A in Education or Bachelor's Degree in Education, from a recognized University.	18 to 35 years.	(a) Fifty percent by promotion on the basis of seniority-cum-fitness, in the following manner: (i) forty per cent from amongst the Certified Teachers (General), Certified Teachers (Agriculture), Certified Teachers (Industrial Arts) and Certified Teachers (Home Economics) with at least five years service as such and having qualification mentioned in column No. 3; (ii) four per cent from amongst the Drawing-Masters with at least five years service as such and having qualification mentioned in column No.3; (iii) four per cent from amongst the Physical Education Teachers with at least five years service as such and having qualification mentioned in column No. 3;

40-

9

				<p>(iv) one per cent from amongst the Instructional Material Specialists, with atleast five years service as such and having qualification mentioned in column No. 3; and</p> <p>(v) one per cent from amongst the Arabic Teachers with at least five years service as such and having qualification mentioned in Column No.3; and</p> <p>(b) fifty per cent by initial recruitment.</p>
2.	Senior Arabic Teacher (SAT) (BPS-16)			By promotion, on the basis of seniority-cum-fitness, from amongst Arabic Teachers, with at least five years service as such and having qualification as prescribed for initial recruitment of Arabic Teacher.
3.	Senior Theology Teacher (STT) (B-16).			By promotion, on the basis of seniority-cum-fitness, from amongst Theology Teachers, with at least five years service as such and having qualification as prescribed for initial recruitment of Theology Teacher.
4.	Senior Certified Teacher (SCT)(General) (BPS-16).			By promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers (General), with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (General).

[Handwritten signature]

	Senior Certified Teacher (Industrial Arts) (BPS-16).		By promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers (Industrial Arts), with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (Industrial Arts).
6.	Senior Certified Teacher (Agriculture) (BPS-16).		By promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers (Agriculture); with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (Agriculture).
7.	Senior Drawing Master (BPS-16).		By promotion on the basis of seniority-cum-fitness from amongst Drawing Masters, with at least five years service as such and having qualification as prescribed for initial recruitment of Drawing Master.
8.	Senior Certified Teacher (SCT) (Home Economics) (BPS-16).		By promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers (Home Economics), with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (Home Economics).
9.	Senior Physical Education Teacher (BPS-16).		By promotion, on the basis of seniority-cum-fitness, from amongst Physical Education Teachers, with at least five years service as such and having qualification as prescribed for initial recruitment of Physical Education Teacher.

-42-

(11)

10	Arabic Teacher (AT) (BPS-15).	(i) Second Class Secondary School Certificate, from a recognized Board with Shahdatul Alamia Fil Uloomul Arabia wal Islamia from a recognized Tanzimatul Wafaqul Madaris; or Darul Uloom Saidu Sharif Swat, Darul Uloom Charbagh Swat, Darul Uloom Chitral, Darul Uloom Darosh Chitral and any other Government run Darul Uloom, as notified by the Government from time to time; or (ii) Second Class Master's Degree in Arabic from a recognized University.	20 to 35 years.	By initial recruitment
11.	Theology Teacher (TT) (BPS-15).	(i) Second Class Secondary School Certificate, from a recognized Board with Shahdatul Alamia from a recognized Tanzimatul Wafaqul Madaris or Darul Uloom Saidu Sharif Swat, Darul Uloom Charbagh Swat, Darul Uloom Chitral, Darul Uloom Darosh Chitral and any other Government run Darul Uloom, as notified by the Government from time to time; or (ii) Second Class Master's Degree in Islamiyat from a recognized University.	20 to 35 years.	(a) Seventy-five per cent by initial recruitment; and (b) twenty-five per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Senior Qaris, with at least five years service and having qualification prescribed for initial recruitment of Theology Teacher. <u>Note:</u> In case of non availability of suitable person for promotion, then by initial recruitment.
12.	Senior Qari (BPS-15).			By promotion, on the basis of seniority-cum-fitness, from amongst Qaris, with at least five years service as such and having qualification prescribed for initial recruitment.
13.	Certified Teacher (General) (BPS-15).	Bachelor's Degree or equivalent qualification from a recognized University with Certified Teacher	18 to 35 years.	(a) Forty per cent by initial recruitment; and

-43-

P.S.T. S.P.T.

no P.T.C.

(12)

		Certificate or two years Associate Degree in Education from a recognized University or eighteen months Diploma in Education.		(b) sixty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the <u>Primary School Head Teachers</u> with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (General): Provided that if no suitable candidate is available, amongst the <u>Primary School Head Teachers</u> for transfer, then the posts will be filled by promotion on the basis of seniority-cum-fitness, from amongst <u>Senior Primary School Teachers</u> with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (General). <u>Note:</u> In case of non availability of suitable person for promotion, then by initial recruitment.
14.	Certified Teacher (Industrial Arts) (BPS-15).	(i) Bachelor's Degree from a recognized University with two years training in the relevant technical subjects from any Government Industrial or Govt. Technical Vocational Institute or Center; or (b) Bachelor's Degree from a recognized	18 to 35 years.	(a) Forty per cent by initial recruitment; and (b) sixty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the <u>Primary School Head Teachers</u> with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher

10

deal

-44-

13

		University with nine months training from any Government Agro Technical Teacher Training Center of the Level of Certified Teacher, Agro technical (Industrial Arts).		(Industrial Arts): Provided that if no suitable candidate is available amongst the Primary School Head Teachers for Promotion, then the posts will be filled by promotion on the basis of seniority-cum- fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (Industrial Arts). <u>Note:</u> In case of non availability of suitable person for promotion, then by initial recruitment.
15	Certified Teacher (Agriculture) (BPS-15).	(i) Bachelor's Degree from a recognized University with one year training in Agriculture from any Government institute or center with nine months training from Government Agro Technical Teacher Training Center of the level of Certified Teacher Agro Technical (Agriculture); or (ii) Bachelor's Degree with Agriculture as one of the subject, from a recognized University; or (iii) Bachelor's Degree from a recognized	18 to 35 years.	(a) Forty per cent by Initial recruitment; and (b) sixty per cent by promotion, on the basis of seniority-cum-fitness from amongst the Primary School Head Teachers, with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (Agriculture): Provided that if no suitable candidate is available amongst the

-45-

		any Government Agro Technical Teacher Training Center of the Level of Certified Teacher, Agro technical (Agriculture).		<p>promotion, then the posts will be filled by promotion on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (Agriculture).</p> <p><u>Note:</u> In case of non availability of suitable person for promotion, then by initial recruitment.</p>
16.	Certified Teacher (Home Economics) (BPS-15).	<p>(i) Bachelor's Degree with Home Economics, as one of the subject, from a recognized University with in service training from Government Agro Technical Teacher Training Center; or</p> <p>(ii) Certified Teacher Certificate with Home Economics, as one of the subjects, from any Government Training school or college with Bachelor's Degree; or</p> <p>(iii) Bachelor's Degree from a recognized University with nine months training from Government Agro Technical Teacher Training Center of the level of the Certified Teacher Agro Technical (Home Economics); or</p> <p>(iv) Bachelor's Degree, from a recognized</p>	18 to 35 years.	<p>(a) Forty per cent by Initial recruitment; and</p> <p>(b) sixty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service as such and having qualification prescribed for initial recruitment of Certified Teacher (Home Economics);</p> <p>Provided that if no suitable candidate is available amongst the Primary School Head Teachers for promotion, then the posts will be filled by promotion on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of</p>

-46-

15

		University with one year vocational training from any Government training center or institute with nine months training from Government Agro Technical Teacher Training center of the level of certified Teacher Agro Technical (Home Economics).		<p>Certified Teacher (Home Economics).</p> <p><u>Note:</u> In case of non availability of suitable person for promotion, then by initial recruitment.</p>
17.	Drawing Master (BPS-15).	Bachelor's Degree from a recognized University with one year Drawing Master (DM) course Certificate.	18 to 35 years.	<p>(a) Eighty per cent by initial recruitment; and</p> <p>(b) twenty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed for initial recruitment of Drawing Master:</p> <p>Provided that if no suitable candidate is available for promotion then on the basis of seniority-cum-fitness, from Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Drawing Master.</p> <p><u>Note:</u> In case of non-availability of suitable candidate for promotion, then by initial recruitment.</p>

-47-

11

11

18.	Physical Education Teacher (BPS-15).	Bachelor's Degree from a recognized University with one year junior Diploma in Physical Education course or Army equivalency or other equivalent qualification.	18 to 35 years.	<p>(a) Eighty per cent by initial recruitment; and</p> <p>(b) twenty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed for initial recruitment of Physical Education Teacher.</p> <p>Provided that if no suitable candidate is available for promotion then on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Physical Education Teacher.</p> <p><u>Note:</u> In case of non-availability of suitable candidate for promotion, then by initial recruitment.</p>
19.	Primary School Head Teacher (PSHT) (BPS-15).	B.A Second Divi		By promotion, on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least ten years service and having qualification prescribed for initial recruitment of Primary School Teacher.
20.	Senior Primary School Teacher (BPS-14).			By promotion, on the basis of seniority-cum-fitness, from amongst Primary School Teachers

48-

17

12.

				with at least five years service as such and having qualification prescribed for initial recruitment of Primary School Teacher.
21.	Primary School Teacher (BPS-12).	(i) Intermediate or equivalent qualification, from a recognized Board with Primary School Teacher Certificate/ Diploma in Education from a recognized Institute; or (ii) Secondary School Certificate, from a recognized Board in second Division with two years Associate Degree in Education from a recognized University.	18 to 35 years.	By initial recruitment on merit at Union Council level: provided that if no suitable candidate is within the Union Council is available, then from the adjacent Union Councils on merit.
22.	Qari (BPS-12).	Intermediate with Hifz-e-Quran and Qirat Sanad from a recognized Institution. <i>P.S.A</i>	18 to 35 years.	By initial recruitment.

Second

49-

SCHEDULE

Selection criterion and other conditions for direct recruitment against the below mentioned posts shall be as under:-

Arabic Teacher

Educational Qualification	Total Marks: 100
SSC	Marks obtained X 20 / total marks = ____
HSSC	Marks obtained X 20 / total marks = ____
BA/BSc	Marks obtained X 20 / total marks = ____
M.A Arabic / Shahdatul Alomia Fil Uloomul Arabia wal Islamia from a recognized Tazimmasul Wafaqul Madaris	Marks obtained X 20 / total marks = ____
Other MA/MSc/M.Ed / MA Edu	Marks obtained X 15 / total marks = ____
MPhil/PhD	Marks = 05

Theology Teacher

Category of Qualification	Total Marks 100
SSC	Marks obtained X 20 / total marks = ____
HSSC	Marks obtained X 20 / total marks = ____
BA/BSc	Marks obtained X 20 / total marks = ____
MA/MSc/M.Ed / MA Edu	Marks obtained X 20 / total marks = ____
M.A Islamiat / Shahdatul Alomia Fil Uloomul Arabia wal Islamia from a recognized Tazimmasul Wafaqul Madaris	Marks obtained X 15 / total marks = ____
MPhil/PhD	Marks = 05

-50-

Qari/Qaria

Category of Qualification	Total Marks-100
SSC	Marks obtained X 20 / total marks = ____
Qari Sanad from a recognized Institution.	Marks obtained X 20 / total marks = ____
HSSC	Marks obtained X 20 / total marks = ____
BA/BSc	Marks obtained X 20 / total marks = ____
MA/MSc/ M.Ed / MA Edu	Marks obtained X 15 / total marks = ____
MPhil/PhD	Marks = 05

*Certified Teacher
(General, Industrial Arts, Agriculture, Home Economics)*

Category of Qualification	Total Marks 150 For Humanities group at Intermediate/Graduation Level	For Candidate of Science group
SSC	Marks obtained X 20 / total marks = ____	5 Extra marks for FSc, 5 Extra marks for B.Sc and 5 Extra marks for M.Sc will be added to the total score obtained by a candidate during his selection.
HSSC	Marks obtained X 20 / total marks = ____	
BA/BSc	Marks obtained X 20 / total marks = ____	
CT Certificate/ Diploma in Education / ADE	Marks obtained X 20 / total marks = ____	
MA/MSc/M.Ed / MA Edu	Marks obtained X 15 / total marks = ____	
MPhil/PhD	Marks = 05	

-51-

VAKALATNAMA
BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Review No. /2024

Dalil Shah

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Edu. Deptt

(RESPONDENT)
(DEFENDANT)

I/We Dalil Shah

Do hereby appoint and constitute **Noor Mohammad Khattak Advocate Supreme Court** 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.

Dalil Shah

دلیل شاہ

Dated. / /2024

CLIENT

ACCEPTED

**NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT**

WALEED ADNAN

UMAR FAROOQ MOHMAND

&

**MAHMOOD JAN
ADVOCATES**

OFFICE:

Flat No. (TF) 291-292 3rd Floor,
Deans Trade Centre, Peshawar Cantt.
(0311-9314232)