


FORM OF ORDER SHEET

Review Petition No. 194/2024

No.	Date of order proceedings	Order or other proceedings with signature of judge
	27/02/2024	<p data-bbox="980 567 1011 604">3</p> <p data-bbox="564 655 1434 1045">The Review Petition of Mr. Amir ur Rehman submitted today by Mr. Noor Muhammad Khattak Advocate. It is fixed for hearing before Division Bench at Peshawar on _____. Original file be requisitioned. Parcha Peshi is given to the counsel for the petitioner.</p> <p data-bbox="980 1071 1387 1121">By the order of Chairman</p> <div data-bbox="1121 1096 1348 1247"> REGISTRAR</div>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

REVIEW PETITION NO. 194 /2024

IN

APPEAL No. 1690/2023

MR. AMIR UR REHMAN

V/S

EDU: DEPTT:

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Dated: 22/02/2024

PETITIONER/APPELLANT

THROUGH:

NOOR MUHAMMAD KHATTAK
ADVOCATE SUPREME COURT

&

MAHMOOD JAN
ADVOCATE HIGH COURT

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

REVIEW PETITION NO. 194 /2024
IN
APPEAL No. 1690/2023

Mr. Amir Ur Rehman, CT (BPS-15),
GHS Swaro Kot, 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 1690/2023 before this august Tribunal, challenging the order dated 19/05/2023, whereby promotion order dated 10/12/2020 was withdrawn by the respondents.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Service Appeal was decided on 08/01/2024, wherein it was held that the promotion order dated: 10.12.2020 was rightly withdrawn, and the salaries and back benefits were protected in the favour of the petitioners.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

THROUGH:


PETITIONER/APPELLANT

NOOR MUHAMMAD KHATTAK
ADVOCATE SUPREME COURT

-4-

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

REVIEW PETITION NO. _____/2024

IN

APPEAL NO. 1690/2023

MR. AMEER UR REHMAN

V/S

EDU: DEPTT:

AFFIDAVIT

I, Mr. Ameer Ur Rehman, CT (BPS-15), GHS Swaro Kot, 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"

-5-

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL NO. 1690 /2023

Mr. Amir Ur Rehman, CT (BPS-15),
GHS Swaro Kot, 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

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 note 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
AMIR UR REHMAN

Through:

NOOR MOHAMMAD KHATTAK

KAMRAN KHAN

UMAR FAROOQ

MUHAMMAD AYUB

WALEED ADNAN

MAHMOOD JAN

Advocates, Peshawar

AFFIDAVIT

I, Amir Ur Rehman, CT (BPS-15), GHS Swaro Kot, 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



District Education Office
District Orakzai

No. 6560 - 9 - 8 -
Dt. 12/12/2020

Phone: 0935-840017 FAX: 0935-840017

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 names in District Orakzai with immediate effect in the interest of public service:

S#	S.I#	Name of teacher	EPS	Date of Birth	Regular Service	Current School	Name of the Post where Based
1	36	Jasrat Ali	15	05/02/1970	01/03/1993	GPS Noor Ali Gohri	GPS Mirzai
2	65	Amal Hassan	15	01/08/1970	23/05/1995	GPS Gohri Mani Khel	GPS Kalaya
3	135	Hassanullah	15	13/02/1972	31/03/2001	GPS Khawab Khel	GPS Arwah Meha
4	159	Ali Majeed	15	05/03/1979	01/09/2003	GPS Sarika Aakhe	GPS Tooli Bagh Central
5	160	Yasin Ullah	15	02/01/1980	01/09/2003	GPS Sarika Mishil	GPS Mishil Batar
6	161	Munawar Shah	15	10/03/1982	01/10/2003	GPS Sarika Khel	GPS Inzer Paili
7	166	Abdul Shakoor	15	01/03/1972	23/10/2003	GPS Sama Mamozai	GPS Drah Shalkhan
8	169	Samer Gul	15	01/01/1979	29/07/2004	GPS Sangra	GPS Mishil Batar
9	170	Fahim ur Rehman	15	05/06/1979	03/08/2004	GPS Talabi All Khel	GPS Sarika Khel
10	178	Muhammad Umar	15	22/04/1976	03/09/2005	GPS Rambic Sadi	GPS Gulistan
11	210	Mir Asghar Wahed Ullah	15	14/10/1984	05/09/2005	GPS Khongar Batar	GPS Sarika Khel
12	232	Muhammad Ullah	15	02/02/1979	23/10/2005	GPS Bhand Khel No.2	GPS Bhand Khel
13	237	Abdul Hussain	12	03/05/1995	24/11/2009	GPS Sier Sam	GPS Sier Sam
14	273	Amista Jan	12	01/03/1986	24/11/2009	GPS Mir Kalam Khel	GPS Qasim Khel, Orakzai
15	277	Muhammad Yaqoob	12	09/03/1987	24/11/2009	GPS Malang Gohri	GPS Yakhia Kuridaw
16	280	Muhammad Hanif	12	21/12/1983	24/11/2009	GPS Bado Shalkhan	GPS Mishil Batar
17	262	Raseeb Rehman	12	05/10/1985	24/11/2009	GPS Gul Cheril	GPS Babera Lasi
18	263	Gul Karim	12	15/01/1982	03/12/2009	GPS Bilazawi	GPS Sadi Feroz Khel
19	284	Dalit Shah	12	04/04/1980	24/11/2009	GPS Dazed Khel	GPS Mir Meha Shalkhan

(Signature)
District Education Officer
Orakzai District, 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 Malaag 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

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P. J. Khan

20	285	Mali Ur. Rehman	12	20/05/1984	24/11/2009	GPS Jabba Koda	GMS Aji Meho
21	287	Gul Rahim	12	05/04/1979	24/11/2009	GPS Karappa Samana	GMS Gulistan
22	288	A. M. Ali	12	18/03/1985	24/11/2009	GPS Khar Khushia	GMS Khali Seedy Khuroj
23	287	Maskeen Khan	12	10/04/1984	02/12/2009	GPS Toor Keal	GMS Dambere Jassi
24	290	S. Khadim Hussain	12	03/05/1985	24/11/2009	GPS Shamir	GMS And Khel
25	291	Rameshwar Hussain	12	16/02/1993	24/11/2009	GPS Zohidar	GMS Dhan Sheikhan
26	292	Munawar Khan	12	10/02/1981	24/11/2009	GPS Palosi	GMS Khali Lepo
27	295	Munawar Hussain	12	10/05/1986	24/11/2009	GPS Injwar Dara	GMS Saifal Dara
28	292	Hussain	12	09/10/1987	24/11/2009	GPS And Khel Bala	GMS Jero
29	300	Azizul Khan	12	10/02/1985	25/11/2009	GPS Mirabi Ali Khel	GMS Zanni Khel
30	302	Sadique Hussain	12	20/04/1986	24/11/2009	GPS Panjam Ali Khel	GMS Alwaha Meho
31	307	Ankur Rehman	12	03/10/1982	24/11/2009	GPS Khadizai No. 1	GMS Swara Kol
32	305	Fahimul Khan	12	02/10/1983	24/11/2009	GPS Swara Kol	GMS Swara Kol
33	306	Munawar Khan	12	25/10/1992	24/11/2009	GPS Chapperi Jashil	GMS Babera Jaki
34	307	Muhammad Ghani	12	26/02/1985	24/11/2009	GPS Kol Ali Khel	GMS Damir Jassi
35	308	Palinda Khan	12	13/05/1984	25/11/2009	GPS Yusaf Khel	GMS Baghinak
36	318	Khalid Khan	12	12/05/1986	24/11/2009	GPS Khadizai No. 2	GMS Dario Jhola

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 they shall be proceeded under the rules framed time to time.
4. Charge report should be submitted to all concerned.
5. There inter-se seniority on lower post will remain intact.
6. His T.D.A is allowed for joining his duty.
7. They will give an under taking to be recorded in their service book to the effect that if any over payment is made to him in light this order will be recovered and if he is wrongly promoted he will be reversed.

~~DISTRICT EDUCATION OFFICER~~
DISTRICT ORAKZAI

Endsl No. 666/69 dated: 10/12/2020

Copy for: warded 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. Khadir 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 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
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

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2. Deputy Commissioner, Orakzai.
3. District Monitoring Officer, Orakzai.
4. District Account Officer District Orakzai.
5. P: 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.

Better Copy

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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 (011) 400013 FAX (011) 400017 District 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&SED Representative) |
| 3. Mr. Saif Ullah, Principal B-19 GHS Mandati 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. Shakteel 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 GHS 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

Sr. #	Name of teacher	BP. S.	Date of Birth	Regular Service	Place of Posting	Remarks
1	36 Zaman Ali	15	03/03/1970	01/03/1993	GPS Naor Ali Garhi	
2	66 Anul Hassan	15	01/09/1970	23/05/1995	GPS Garhi Mani Khel	
3	126 Hassanullah	15	13/02/1972	31/03/2001	GPS Khawaz Khel	
4	159 Ali Akhbar	15	05/03/1979	01/09/2003	GPS Sarika	
5	166 Yasin Ullah	15	02/01/1980	01/09/2003	GPS Sarika	
6	161 Muhammad Shah	15	10-03/1982	01/10/2003	GPS Sarika Khel	
7	165 Abdul Shakoor	15	01/03/1972	23/10/2003	GPS Sarika	
8	167 Samir Gul	15	01/01/1979	29/07/2004	GPS Sarika	
9	170 Khairi ur Rehman	15	05-06/1979	03/08/2004	GPS Tarapi Ali Khel	
10	175 Muhammad Umar	15	23/04/1976	03/09/2005	GPS Ramhio Sarika	
11	218 Mir Asghar	15	16/10/1984	05/09/2005	GPS Khajoor Daar	
12	219 Babar Ullah	15	02/03/1979	23/10/2005	GPS Dhand Khel No.2	
13	227 Iqbal Hussain	12	03/05/1985	24/11/2009	GPS Sier Sarika	
14	228 Khairi Jan	12	01/05/1986	24/11/2009	GPS Mir Kalan Khel	
15	229 Muhammad Yaqub	12	09/03/1987	24/11/2009	GPS Malang Garhi	
16	280 Muhammad Hanif	12	24/12/1982	24/11/2009	GPS Baku Sheikhani	
17	282 Naveed Rehman	12	05/10/1985	24/11/2009	GPS Gul Chert	
18	283 Gul Karim	12	15/01/1982	05/12/2009	GPS Dilazmi	
19	284 Dadi Shah	12	01/02/1980	24/11/2009	GPS Bazed Khel	
20	285 Aman U'r Rehman	12	20/03/1984	24/11/2009	GPS Jahn Koda	
21	287 Gul Bahar	12	05/04/1979	24/11/2009	GPS Karayo Subina	
22	288 Ashfaq Ali	12	18/03/1985	24/11/2009	GPS Khar Khushia	
23	289 Ashraf Khan S Khushia	12	10/04/1984	02/12/2009	GPS Taar Kail	
24	293 Hussain	12	05/05/1985	24/11/2009	GPS Shamel	
25	291 Raza Akbar Hussain	12	16/02/1982	24/11/2009	GPS Zakhani	
26	294 Asghar Muhammad Khan	12	10/02/1981	24/11/2009	GPS Palaosi	
27	295 Khan	12	10/03/1986	24/11/2009	GPS Bijnawar	
28	298 Shayan Hussain	12	09/10/1987	24/11/2009	GPS And Khel Hala	
29	300 Anjad Khan	12	18/02/1985	25/11/2009	GPS Tarapi Ali Khel	
30	302 Ghani	12	21/01/1986	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	Wabeed 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	GPSZakhian	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 Injawar	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

101	Rehman	12	03/10/1982	24/11/2002	GPS Khatul No.1
102	Muhammad Khan	12	03/10/1983	24/11/2002	GPS Sawera Kot
103	Khan	12	28/10/1982	24/11/2002	GPS Chappur Mishil
104	Chohan	12	26/02/1985	24/11/2002	GPS Kot Ali Khatul
105	Pasookh Khan	12	13/04/1984	23/11/2002	GPS Yusuf Khatul
106	Wajid Khan	12	12/05/1986	24/11/2002	GPS Khatul 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 Lillah
SCT GMS Bagara Mishil
Member
2. Shakeel Anwar
SST GMS Swara Kot
Member
3. Mr. Abdul Malik
ADEO Orakzal
Member
4. Kausar Ali
ADEO Orakzal
Member
5. Mr. Wabilla Naz
ADEO Orakzal
Member
6. Muhammad Iqbal (HM)
GHS Mishil Bagara
Member
7. Mr. Raza Khan
ADEO Orakzal
Member
8. Saif Ullah Principal
GHS Mandel
Member
9. Hamid Ullah Khan
Additional Director NMD
KP E&SD Representative

Mr. Farooq Ullah Mahsud
District Education Officer Orakzal
(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	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	

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

36
Nil

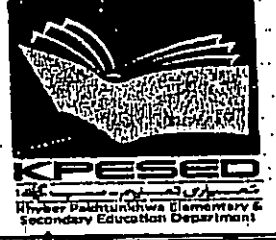
The meeting ended vote of thanks to and form the chair.

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 "C"



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 DEC (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 Orakzai 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 Mishti Bazar	GPS Bada Sheikhan
5.	Naseeb Rehman	GMS Babra Laaki	GPS Gul Cheri
6.	Gul Karim	GMS Safri Feroz Khel	GPS Ghutak Ali Khel
7.	Daili Shah	GHS Bazid Khel	GPS Rangin Khel
8.	Mati Ur Rehman	GHS Avi Mela	GPS Dago Takhtak
9.	Gul Rahim	GHS Gullistan	GPS Khae Kada No.1
10.	Ashfaq Ali	GMS Khalil Sepoy	GPS Bal Kot
11.	Maskeen Khan	GMS Damber Lasli	GPS Dran Sheikhan
12.	Syed Khadim Hussain	GHSS Andkhel	GMPS Shamer
13.	Raees Akbar	GMS Wampanra	GPS Kagnal Sher Khel
14.	Hussain Asgher	GMS Khalil Sepoy	GPS Khar Khushta
15.	Minawar Khan	GHS Saifal Darrah	GPS Arkhio Killi
16.	Shiren Hassan	GMS Mirako Payan	GPS Suleman Khel
17.	Amjad Khan	GMS Zanka Khel	GPS Taghnal
18.	Saqib Ul Islam	GHS Jarna 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 Khadizai No.1
21.	Munawar Khan	GHS Chapper Mishli	GPS Zor Chapper
22.	Muhammad Ghani	GMS Stara Kada	Kot Ali Khel
23.	Palnda Khan	GHS Baghnak	Ghutak Ali Khel
24.	Israfil Khan	GMS Dana Khula	GPS Taropi Ali 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



-15- 4.80 -185

DIRECTORATE OF ELEMENTARY &
SECONDARY EDUCATION, KHYBER
PAKHTUNKHWA PESHAWAR
P.NO.61/GENERAL TRANSFER
NO. 18811 DATED 11/04/2023

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 Zari Shah PC (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
ASD
26/3/23

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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.



OFFICE OF THE DISTRICT EDUCATION OFFICER (M) ORAKZAI
DISTRICT HEADQUARTER ORAKZAI AT BABER MELA HANGU
Phone: #0925-690017; Fax: #0925-690017
Email: deorakza2020@gmail.com



No. 1344 Dated: 28/07/22

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 has been directed to withdraw the promotion order of twenty four/24 PSTs BPS: 12 to CT BPS: 15 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.

Forgoing in view of the above, the aforesaid twenty four/24 PSTs 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 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 than 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)

ORAKZAI

Copy of Evn No. & Date:

Copy forwarded for information and necessary action to the:

1. Deputy Commissioner, Orakzai.
2. Additional Director (Estab), Directorate of E&SE, MAE, 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)

ORAKZAI

Better Copy

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.

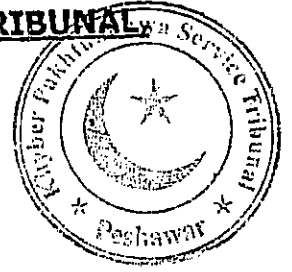
In the light of above, letter issued by your esteemed office dated 11/04/2023 may be reviewed in the interest of public service and to avoid any litigation, please.

District Education Officer (M)
 Orakzai

"D" -17-
-0

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

APPEAL NO. 1690 /2023



Mr. Amir Ur Rehman, CT (BPS-15),
GHS Swaro Kot, 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

EXAMINER
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 Muhaminad 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


ATTORNEY
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

EXAMINER
Khyber Pakhtunkhwa
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,

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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

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MEMBER
Palikotukhwa
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.



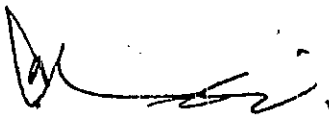
ATTESTED

EXAMINER
Hyder Pakhtkhwa
Service Tribunal
Ferozpur

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)

Date of Presentation 08/01/24
 Number of Words 67
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 KALIM ARSHID KHAN
 Chairman
 Service Tribunal
 Peshawar

No. 1510Dated: 17/1/2018Working Papers for Departmental Promotion of PST B-12 to Senior PST B-14DPC NO.14

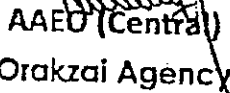
Total No. of PTC Posts (Duly verified from AAO)	535
No. of GPS Schools	272
No. of PTC Teachers to be promoted to BPS 14	15
Net to be promoted	15
Proposed for promotion	15

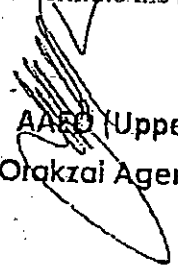
Subject: List of PTC (Male) for Promotion BPS12- to BPS-14

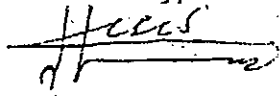
Sl#	S.L#	Name of Official	Father's Name	Acad: Qual:	Prof: Qual:	BPS	Date of Birth	Date of 1 st Appointment	Date of Charge As PTC	Trained W.E.F.	Awarded BPS	Present Post
1	312	Rizwan Khan	Gul Samand	FA	PTC	12	22/06/1969	22/10/2005	24/10/2005	24/10/2005	14	GPS Obian
2	313	Waris Ali	Syed Asker	FA	PTC	12	09/05/1977	22/10/2005	24/10/2005	24/10/2005	14	GPS Sara Khawa
3	314	Fazal Amin	Pir Bat Khan	BA	PTC	12	12/07/1981	28/08/1999	27/10/2005	27/10/2005	14	GPS Nareek No.2
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 Abi Shai
5	317	Khan Wazir	Alim Haider	BA	PTC	12	01/01/1974	23/11/2009	24/11/2009	24/11/2009	14	GPS Nari Garhi
6	318	Fozal Bari	Ahmed Jamil	FA	PTC	12	05/02/1978	23/11/2009	24/11/2009	24/11/2009	14	GPS Khawas Khel
7	319	Gul Rahim	Abdul Ahad	BA	PTC	12	05/04/1979	23/11/2009	24/11/2009	24/11/2009	14	GPS Ghuz Garh
8	320	Rait Khan	Akram Khan	FA	PTC	12	02/10/1979	23/11/2009	24/11/2009	24/11/2009	14	GPS Oni
9	321	Dulil Shah	Mokhminat Shah	MA	B.Ed	12	04/04/1980	23/11/2009	24/11/2009	24/11/2009	14	GPS Bazed Khel
10	322	Abdul Halim	Habib-Ur-Rehman	BA	PTC	12	05/06/1980	23/11/2009	24/11/2009	24/11/2009	14	GPS Arghunja
11	323	Momin Shah	Khial Shah	FA	PTC	12	04/01/1982	23/11/2009	24/11/2009	24/11/2009	14	GPS Kagnai Sher Khel
12	324	Races Akbar	Khial Wazir	BA	PTC	12	16/02/1982	23/11/2009	24/11/2009	24/11/2009	14	GPS Zakhtan
13	325	Amir Rehman	Wazir Bad Shah	FA	PTC	12	03/10/1982	23/11/2009	24/11/2009	24/11/2009	14	GPS Khadizai No.1
14	326	Munawar Khan	Azam Khan	FA	PTC	12	25/10/1982	23/11/2009	24/11/2009	24/11/2009	14	GPS Chapper Mishiti
15	327	Serab Ali	Mashrah Ali	FA	PTC	12	05/12/1982	23/11/2009	24/11/2009	24/11/2009	14	GPS Bari Khel

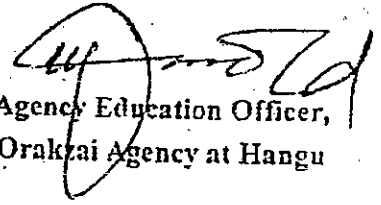
- (a) have been completed the required length of qualifying service and qualification as required for promotion to BPS-14 under the rules.
- (b) Non of them is on deputation to any organization under the Federal/Provincial/Autonomous/Semi autonomous/International organization.
- (c) Neither any disciplinary/departmental 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-

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	Nawab 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.	Lalil Khan	Fozal Janan	FA	PTC	14	06/03/1971	22/11/1989	22/11/1989	09/01/1995	15	GPS Zaina Khel
6.	Alser Khan	Ilyas Khan	FA	PTC	14	04/05/1971	22/11/1989	02/12/1989	09/01/1995	15	GPS Zawan

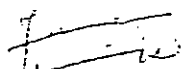
26-

	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	
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.	Sabil 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	Sabil Rehman	FA	PTC	14	14/03/1979	02/09/2005	02/09/2005	03/09/2005	15	GPS Rama Mamozai
10.	Zor Mir Ali	Nazir Ali	FA	PTC	14	15/03/1980	02/09/2005	03/09/2005	03/09/2005	15	GPS Sara Khawa

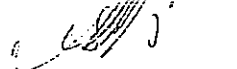
I have been completed the required length of qualifying service and qualification as required for promotion to BPS-14 and Senior PTC B-15 under the rules.

-) 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 ing 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.

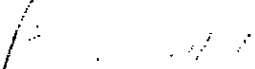
Member


Janal Khan (CT)
GHS Saifal Darrah
Orakzai Agency

Member


Shakil Ahmad (CT)
GHS Swaro Kot
Orakzai Agency

Chairman


Aliq ur Rahman
Agency Education Officer,
Orakzai Agency at Hangu

OFFICE OF THE AGENCY EDUCATION OFFICER, ORAKZAI AGENCY AT HANGU
Dated 29/01/2017

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

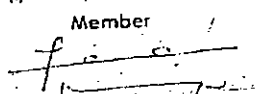
DPC 11

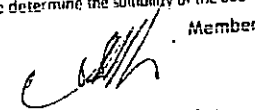
Subject: List of PTC (Male) for Promotion BPS-12 to BPS-14

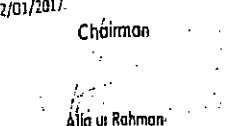
-28-

S#	Name of Official	Father Name	Academic Qualification	Prof. Qual.	BPS	Date of Birth	Date of 1 st Appointment	Date of Change As PTC	Trained W.E.F.	Awarded BPS	Present Post	Remarks
1.	Daud Khan	Abdur Rehman	FA	PTC	12	04/04/1965	15/05/1984	16/05/1984	31/05/1987	14	GPS Sargodha	
2.	Khana Din	Isht Din	FA	PTC	12	03/03/1966	06/06/1984	07/06/1984	09/01/1995	14	GPS Sargodha	
3.	Mohammad Asif	Hazrat Khan	FA	PTC	12	02/02/1970	30/09/1989	10/10/1989	14/11/1990	14	GPS Sargodha	No Service Book
4.	Syed Basir Hussain	S. Ameer	FA	PTC	12	01/08/1970	01/08/1989	01/08/1989	09/01/1995	14	GPS Sargodha	
5.	Mohammad Saffar	Abdul Ghafar	FA	PTC	12	01/08/1970	03/10/1993	04/10/1993	25/05/1996	14	GPS Sargodha	FA Result B-8-2015
6.	Mohammad Ayaz	Fazal ul Rehman	FA	PTC	12	10/03/1972	06/06/1994	08/06/1994	11/05/1999	14	GPS Sargodha	
7.	Anayat Ali	Rehmat Shah	FA	PTC	12	03/01/1974	06/11/1994	08/11/1994	25/05/1996	14	GPS Sargodha	No Service Book
8.	Khana Jan	Zanjan Khan	FA	PTC	12	04/01/1974	15/01/1993	16/10/1993	11/05/1999	14	GPS Sargodha	FA Result 26-12-2015
9.	Mohammad Shabb	Khalid Wazi	FA	PTC	12	20/04/1976	06/11/1994	10/11/1994	11/05/1999	14	GPS Sargodha	
10.	Hafiz Rehman	Abdur Rehman	FA	PTC	12	25/07/1976	09/09/2002	11/09/2002	11/09/2002	14	GPS Sargodha	

- (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 Saifal Darrah
Orakzai Agency

Member

Shakil Ahmad (CT)
GHS Swaro Kot
Orakzai Agency

Chairman

Aliq ul Rahman
Agency Education Officer,
Orakzai Agency at Hangu


No: 322

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


Date:

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

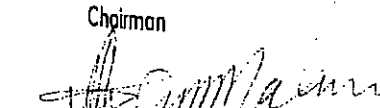
Member


Janat Khan (CT)
GHS Saifal Darrah
Orakzai Agency

Member


Shakil Ahmad (CT)
GHS Swaro Kot
Orakzai Agency

Chairman


Aliqur Rahman
Agency Education Officer,
Orakzai Agency at Hangu

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No. 5005/

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 Bazo 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 Mirzai
5.	Latif Khan	Fazal Janan	FA	PTC	06/03/1971	22/11/1989	22/11/1989	09/01/1995	14	GPS Zaina Khet
6.	Afser 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 Melo
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	Hobibur Rehman	FA	PTC	14/03/1979	02/09/2005	03/09/2005	03/09/2005	14	GPS Sama Momozai
10.	Zar Mir Ali	Nazir 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 Arghonja
12.	Fazal Mir	Syed Shah	FA	PTC	05/04/1981	02/09/2005	04/09/2005	04/09/2005	14	GPS Chinor Ali Khet
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 Akhet
15.	Waheedulla	Noon Bad Sh	FA	PTC	02/02/1979	22/10/2005	23/10/2005	23/10/2005	14	GPS Mir Kalam Khet
16.	Salahuddin	Ajmir Khan	FA	PTC	03/02/1980	22/10/2005	23/10/2005	23/10/2005	14	GPS Chopper Ali Khet

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Member

Janat Khan (CT)
GHS Saifal Darrah
Orakzai Agency

Member

Shakil Ahmad (CT)
GHS Swaro Kot
Orakzai Agency

Chairman

Ali ur Rahman
Agency Education Officer,
Orakzai Agency al Hangu

18/12/16

Male

OFFICE OF THE AGENCY EDUCATION OFFICER, ORAKZAI AGENCY AT HANGU

No. 1385 Dated 28/12/2018

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

DPC NO.16

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	3
Not to be promoted	3
Proposed for promotion	3

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

Sr	S.I. No.	Name of Official	Post Name	Acad. Qual.	Pop. Qual.	GPS	Date of Birth	Date of 1st Appointment	Date of Charge Ass. PTC	Trained W.E.F.	Awarded GPS	Present Post
1	125	S Iraj Hussain	PST	S. Tashir Hussain	2.1	12	11.02.1964	09.04.1988	11.04.1988	09.01.1993	14	GPS Gulistan
2	179	Etahir Ullah	PST	None	2.1	12	01.10.1969	30.09.1994	01.09.1994	13.05.1997	14	GPS Athan Khan Chappar
3	188	Muhammad Ali	PST	Rashid Ali	2.1	12	24.08.1973	19.09.1998	12.09.1998	19.09.1998	14	GPS Tanki Garw

- (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 (Lower)
Orakzai Agency

Agency Education Officer,
Orakzai Agency at Hangu

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OFFICE OF THE AGENCY EDUCATION OFFICER, ORAKZAI AGENCY AT HANGU

No. 1389 / 1 Dated 22/02/2018

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 CPS 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 BPS15

Sr. No.	Sl. No.	Name of Officer	Father's Name	Acad. Qual.	Prof. Qual.	BPS	Date of Birth	Date of Appointment	Grade	Grade Date	Grade	Grade Date
1	173	S. Faraj Hussain	S. Fakhru Hussain	FA	AST	14	14/02/1964	19/04/1992	110021928	109/01/1992	15	07/08/2017
2	179	Habibullah	S.oor Mohammad	FA	AST	12	01/11/1969	30/09/1992	101021924	133/01/1992	13	07/08/2017
3	183	Mohd. Ali	Mohd. Ali	FA	AST	12	14/02/1971	19/07/1992	190021928	128/01/1992	15	07/08/2017

- (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 section.
- (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 any of them during the last five years.
- (d) No one is on long leave/Ex-Pakistan 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-15 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-15 with immediate effect.

AAEO (Central)
Orakzai Agency

AAEO (Lower)
Orakzai Agency

Agency Education Officer
Orakzai Agency

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

No. 2871 Dated: 21/02/2018

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

DPCNO 17

Total No. of P.T.C Posts (Only verified from MAO)

535

No. of GPS Schools

272

No. of P.T.C Teachers to be promoted to BPS-14

2

Not to be promoted

2

Proposed for promotion

2

Subject: List of P.T.C (Male) for Promotion BPS-12 to BPS-14

S.No.	Name of Official	Current Name	Acad. Qual.	Post Qual.	BPS	Date of Birth	Date of Appointment	Date of Transfer	Trained by E.F.	Availed BPS	Present Post
95	Jamal Khan	Darab Khan	F.A.	PTC	12	04/08/1971	30/08/1989	12/10/1989	22/11/1993	14	GPS Mardan
150	Jamroz Khan	Ahmer Jan	F.A.	PTC	12	17/03/1967	16/08/1989	11/08/1989	09/01/1995	14	GPS Layan

- (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 suspension 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/leave without pay.
- (e) They are all alive and serving.
- (f) Their appointment orders against P.T.Cs posts are attached herewith.
- (g) The Senior list of B-14 officials is final, undisputed and not subject to.
- (h) The departmental promotion committee is requested to determine the suitability of the above P.T.Cs for promotion to BPS-14 with immediate effect.

Verified by:

[Signature]
 AAO (General)
 Orakzai Agency

[Signature]
 AAO (Lower)
 Orakzai Agency

[Signature]
 Agency Education Officer
 Orakzai Agency at Hangu

OFFICE OF THE AGENCY EDUCATION OFFICER, ORAKZAI AGENCY AT HANGU

No. 9679

Dated: 21/2/2018

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	2
Net to be promoted	2
Proposed for promotion	2
DPC NO 17	

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

Sr	Sl No	Name of Official	Father's Name	Acad Qual	Prof Qual	BPS	Date of Birth	Date of Appointment	Date of Charge as PTC	Trained as PTC	Awardeed D/S	Present Post
1	95	Jamini Khan	Deryab Khan	FA	PTC	14	04.09/1971	13.02/1987	12.10/1989	22.11/1992	15	GPS, Mardun
2	130	Jamra Khan	Muhter Jan	FA	PTC	14	13.05/1967	16.03/1987	11.03/1989	09.01/1993	15	GPS, Lary

- (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/Autonomous Sector autonomous International organization.
- (c) Further 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 D-1 Officials is final, undisputed and not subject to.
- (i) The departmental promotion committee is requested to determine the suitability of the above PTCs for promotion to BPS-15 with immediate effect.

Verified by

AAEO (Central)
Orakzai Agency

AAEO (Lower)
Orakzai Agency

Agency Education Officer,
Orakzai Agency at Hangu

35

(1)

Agency Education Office No. 4/03
Orakzai Agency at Hangu Date: 22/11/2016
PHONE: 01925-690017 FAX: 01925-690013

EX-POST FACTO

MINUTES OF THE MEETING OF THE COMMITTEE FOR UPGRADATION AND PROMOTION OF PST'S (M/F) TO PRIMARY SCHOOL HEAD TEACHER PSHT (M/F) BPS-15 AND DART (M/F) TO SENIOR QARI (M/F) BPS-15 IN ORAKZAI AGENCY

In order to consider the up gradation and promotion cases of PST (M/F) to Primary school Head Teacher (M/F) BPS-15 and Qari (M/F) to Senior Qari BPS-15 in the light of notification No. 8233-60 Dated 8-8-2015 a meeting of the committee was held in the office of the Agency Education Officer Orakzai Agency on 22/11/2016. The Agency Education Officer being Chairman presided the meeting.

Other members of the committee were as under:

1. Mr. Atiq ur Rahman Agency Education Officer Orakzai Agency (Chairman)
2. Mr. Muhib ur Rehmani DDE (Estab) FATA (Member)
3. Mr. Janat Khan CT GHS Salfai Darrah Orakzai Agency (Member)
4. Mr. Shakil Ahmad CT GHS Sworkat Orakzai Agency (Member)

The meeting was started with the recitation of the Holy Quran. The chairman welcomed the members and elaborated the process and procedures to be adopted for up gradation/promotion of teachers.

Regarding up gradation of PST (M) to Primary school Head Teacher (M) BPS-15, there are 272 Govt Primary Schools in Orakzai Agency as per AEO statement and there are 535 Male PTC Sanctioned posts duly verified from AAO Orakzai Agency.

As per above said notification one PST post will be upgraded to primary school Head Teacher post BPS-15 in each primary school. Keeping in view the said notification as well as the criteria in vague, the seniority List of PST (M) teachers along with service Books and academic plus professional documents were thoroughly checked and scrutinized. As a result 21 PST (M) teachers were upgraded/promoted to primary school Head Teacher BPS-15 on the basis of 10 year required Service plus Seniority/Fitness.

It was unanimously decided that in case of one than more teachers upgraded/promoted to the post of primary school Head Teacher BPS-15 due to any reason, the teacher/teachers shall submit in written to the chairman of the committee, but if the same teacher/teachers found eligible for up gradation to the post of senior PST BPS-14 then the chairman of the committee will consider him/her for the same.

The chairman of the committee shall verify the academic as well as professional documents of the upgraded/promoted teachers from the concerned Boards/Universities/Institutions/Decrial Ulooms and the benefits of the up gradation/promotion will remain effective after the verification of documents of the upgraded/promoted teachers.

The chairman of the committee will display the lists of the upgraded/promoted teachers for 15 days for general information and observations will be called if any.

Adjustment Orders of upgraded/promoted teachers will be issued after complete verification of appeals of the appellants if any. Furthermore DDE (Estab) Mr. Muhib ur

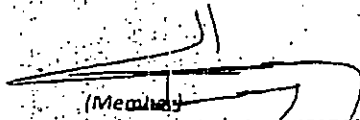
Rehman has clarified that 16 Posts of Male SPST BPS NO. 14 and 12 Posts of SPST (Female) BPS NO. 14 have been sanctioned hereby.

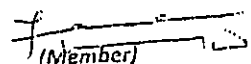
The Meeting ended with a vote of thanks by the chairman.


-36- (29)

(Chairman)

Atiq ur Rahim
Agency Education Officer,
Orakzai Agency at Hangu


(Member)
Muhib ur Rehman (DDE TESTAB) FATA


(Member)
Janat Khan (CT)
GHS Saifal Darrah


(Member)
Shakil Ahmad (CT)
GHS Swaro 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
-37-

Dated 06/08/2020

6

GOVERNMENT OF THE KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

NOTIFICATION

Peshawar, dated the November 13, 2012.

No.SO(PD)4-5/ESRC/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.

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

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.

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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 Executive 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)

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8

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;

	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.

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				<p>(iv) one per cent from amongst the Instructional Material Specialists, with at least 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).

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(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 Tanzimatuul 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 Tanzimatuul 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

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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

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		<p>University with nine months training from any Government Agro Technical Teacher Training Center of the Level of Certified Teacher, Agro technical (Industrial Arts).</p>		<p>(Industrial Arts):</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 Certified Teacher (Industrial Arts).</p> <p><u>Note:</u> In case of non availability of suitable person for promotion, then by initial recruitment.</p>
15	<p>Certified Teacher (Agriculture) (BPS-15).</p>	<p>(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</p> <p>(ii) Bachelor's Degree with Agriculture as one of the subject, from a recognized University; or</p> <p>(iii) Bachelor's Degree from a recognized</p>	<p>18 to 35 years.</p>	<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 and having qualification prescribed for initial recruitment of Certified Teacher (Agriculture):</p> <p>Provided that if no suitable candidate is available amongst the</p>

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		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>

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		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>

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12

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).	<i>B.A Second Div</i>		By promotion, on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least <u>ten years service</u> 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

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				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.	18 to 35 years.	By initial recruitment.

B.A

Second

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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 Alamia Fil Uloomul Arabia wal Islamia from a recognized Tenzimuatul 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 Alamia Fil Uloomul Arabia wal Islamia from a recognized Tenzimuatul Wafaqul Madaris	Marks obtained X 15 / total marks = ____
MPhil/PhD	Marks = 05

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Quri/Quria

Category of Qualification	Total Marks 100
SSC	Marks obtained X 20 / total marks = ____
Qurt Sanad from a recognised 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 100 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	

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VAKALATNAMA
BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Review No 12024

Amir ul Rehman

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Edly. Deptt

(RESPONDENT)
(DEFENDANT)

I/we Amir ul Rehman

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.

Dated. ___/___/202

Amir ul Rehman

[Signature]
CLIENT

ACCEPTED

[Signature]
**NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT**

[Signature]
WALEED ADNAN

[Signature]
UMAR FAROOQ MOHMAND

&

[Signature]
**MAHMOOD JAN
ADVOCATES**