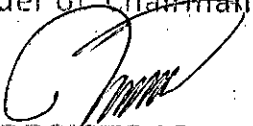


FORM OF ORDER SHEET

Court of \_\_\_\_\_

Review Petition No. 193/2024

No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
	27/02/2024	<p>The Review Petition of Mr. Munawar Khan 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>By the order of Chairman</p>  <p>REGISTRAR</p>

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

REVIEW PETITION NO. 193 /2024  
IN  
APPEAL No. 1688/2023

MR. MUNAWAR KHAN

V/S

EDU: DEPTT:

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2.	Copy of Memo of Service Appeal, promotion dated: 10/12/2020, and withdrawal of promotion order dated: 19/05/2023 & relevant documents	A, B & C	5-16
3.	Copy of Judgment/order dated 08/01/2024	D	17-23
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Dated: 22/02/2024

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

-1-

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

REVIEW PETITION NO. 193 /2024  
IN  
APPEAL No. 1688/2023

Mr. Munawar Khan, CT (BPS-15),  
GMS Babera, 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 1688/2023 before this august Tribunal, challenging the order dated 19/05/2023, whereby promotion order dated 10/12/2020 was withdrawn by the respondents.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

&

  
MAHMOOD JAN  
ADVOCATE HIGH COURT

-4-

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

REVIEW PETITION NO. \_\_\_\_\_/2024

IN

APPEAL No. 1688/2023

MR. MUNAWAR KHAN

V/S

EDU: DEPTT:

**AFFIDAVIT**

I, Mr. Munawar Khan, CT (BPS-15), GMS Babera, 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" - 1 - 5 -

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

**APPEAL NO. 1688 /2023**

Mr. Munawar Khan, CT (BPS-15),  
GMS Babera, 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 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 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

- 11 - - 6 -

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

4. That the appellant is a highly qualified person and his field. Copy of the educational testimonials are attached as annexure .....C.
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 annexure .....D.
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 annexure .....E.
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 annexure .....F.
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 mala fide 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

  
MUNAWAR KHAN

Through:


  
NOOR MOHAMMAD KHATTAK  
ADVOCATE SUPREME COURT

  
KAMRAN KHAN

  
UMAR FAROOQ

  
MUHAMMAD AYUB

  
WALEED ADNAN

  
MAHMOOD JAN  
Advocates, Peshawar

**AFFIDAVIT**

I, Munawar Khan, CT (BPS-15), GMS Babera, 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. 6660 - 9 - 8 -  
Dated 20/12/2020

Phone: 0935-496017 FAX: 0935-496017

**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.

Sr	S. No	Name of teacher	BPS	Date of Birth	Regular Service	Current School	Name of the School where posted
		Asad Ali	15	05/02/1970	01/03/1993	GPS Naor Ali Garhi	GMS Mirzai
		Abdul Hassan	15	01/05/1970	23/05/1995	GPS Garhi Marikhel	GHS Kalaya
		Abdullah	15	13/02/1977	31/03/2001	GPS Khawas Khel	GMS Akwarha Mela
						GPS Sarika Aakhe	GHS Taoli Bagh Orakzai
		Abdullah	15	05/03/1979	01/09/2003		
		Abdul Wahid	15	02/01/1980	01/09/2003	GPS Sarika Mithli	GHS Mithli Bazar
		Abdul Wahid	15	16/03/1982	01/10/2003	GPS Sarika Khel	GHS Inzer Patti
		Abdul Wahid	15	01/03/1972	23/10/2003	GPS Sama Mamozai	GHS Dera Shekhan
		Amir Gul	15	01/01/1979	29/07/2004	GPS Sangra	GHS Mithli Bazar
		Amir Gul	15	05/06/1979	03/08/2004	GPS Tarapi AM Khel	GMS Sarika Khel
		Muhammad Umer	15	22/04/1976	03/09/2005	GPS Rambic Salai	GHS Gulistan
		Ali Asghar	15	16/10/1984	05/09/2005	GPS Khangar Bazar	GMS Sarika Khel
		Ullah	15	02/02/1979	23/10/2005	GPS Bland Khel No.2	GMS Bland Khel
		Iqbal Hussain	12	05/05/1985	24/11/2009	GPS Sier Sam	GMS Sier Sam
		Shahida Jan	12	01/03/1986	24/11/2009	GPS Mir Kalam Khel	GMS Qasim Khel Orakzai
		Muhammad Yaqoob	12	09/03/1987	24/11/2009	GPS Malang Garhi	GMS Yarkho Kandaw
		Muhammad Hanif	12	21/12/1982	24/11/2009	GPS Bada Shakhani	GMS Mithli Bazar
		Naseeb Rehman	12	05/10/1985	24/11/2009	GPS Gul Chen	GMS Babera
		Gul Karim	12	15/01/1982	03/12/2009	GPS Bllazaw	GMS Sarika Ferji
		Dal Shah	12	04/01/1980	24/11/2009	GPS Dzed Khel	GMS Mir Mela Shakhani

District Education Officer  
Orakzai District, Orakzai

**OFFICE OF THE DISTRICT EDUCATION OFFICER DISTRICT ORAKZAI**

Dated: 10-12-2020

**NOTIFICATION**

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

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

-9-

Peshawar

20	283	Mall Ur Rahman	12	20/05/1984	24/11/2009	GPS Joba Kado	GHS AVI Mele
21	287	Gul Rahim	12	05/04/1979	24/11/2009	GPS Karapa Samano	GHS Gulistan
22	288	Ashfaq Ali	12	18/03/1985	24/11/2009	GPS Khar Khushla	GMS Khall Seppay (Khura)
23	289	Maskeen Khan	12	10/04/1984	02/12/2009	GPS Toor Kanl	GMS Damber Lassli
24	290	S.Khadim Hussain	12	03/05/1985	24/11/2009	GPS Shamer	GHS And Khei
25	291	Razee Akbar	12	16/02/1982	24/11/2009	GPS Iakhan	GHS Dhan Sheikhan
26	292	Hussain Asghar	12	10/02/1981	24/11/2009	GPS Palbast	GMS Khall Seppay
27	293	Munawar Khan	12	10/05/1986	24/11/2009	GPS Injwar	GHS Saifal Dara
28	294	Hassan	12	09/10/1987	24/11/2009	GPS And Khei Bala	GMS Zera
29	295	Azjad Khan	12	10/02/1985	25/11/2009	GPS Hussain Ali Khei	GMS Janki Khei
30	296	Saib Ullah	12	20/04/1986	24/11/2009	GPS Panjam Ali Khei	GMS Alwarha Mele
31	297	Amir ur Rahman	12	03/10/1982	24/11/2009	GPS Khadizal No.1	GMS Swara Koi
32	298	Samuel Khan	12	02/10/1983	24/11/2009	GPS Swara Koi	GMS Swara Koi
33	299	Munawar Khan	12	25/10/1982	24/11/2009	GPS Chappar Fakhil	GMS Babera Lal
34	300	Muhammad Raza	12	26/02/1985	24/11/2009	GPS Koi Ali Khei	GMS Damber Lassli
35	301	Sajida Khan	12	13/04/1984	25/11/2009	GPS Yusuf Khei	GMS Bagh Mok
36	302	Muhammad Khan	12	12/05/1986	24/11/2009	GPS Khadizal No.2	GMS Dana Shula

**Terms & Conditions:**

1. They would be on probation for a period of one year extendable for further period of one year.
2. They will be governed by such rules & regulations as and when issued from time to time by the govt.
3. Their services can be terminated at any time in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be proceeded under the rules framed time to time.
4. Charge report should be submitted to all concerned.
5. There Inter-Se seniority on lower post will remain intact.
6. His TA/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

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

Copy forwarded for information and necessary action to the:

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

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

**Terms and conditions:-**

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

District Education Officer  
District Orakzai

Endst: No 6661-69

Dated 10/12/2020

Copy forwarded for information and necessary action to the

1. Director Education (E&SE) Khyber Pakhtunkhwa

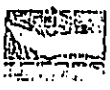
-10-

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

~~\_\_\_\_\_~~  
DISTRICT EDUCATION OFFICER  
DISTRICT ORAKZAI

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

District Education Officer  
District Orakzai



-11- "B" 6-8

District Education Office  
District Orakzai

No. 3514

Phone 0923-490017 FAX 0923-490015 Date 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 Farooq 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 Mandali District Orakzai | Member                   |
| 4. Mr. Muhammad Iqbal, HM GHS Mishil Bazar                     | Member                   |
| 5. Kausar Ali, ADEO District Orakzai                           | Member                   |
| 6. Mr. Abdul Abdul Malik, ADEO District Orakzai                | Member                   |
| 7. Mst. Nabila Naz, ADEO District Orakzai                      | Member                   |
| 8. Mr. Shakeel Ahmed, SST GHS Swara Kot                        | Member                   |
| 9. Mr. Wahid Ullah, SCT GMS Bagara Mishil                      | 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 Orakzai 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                | (KPESD 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. No.	Name of teacher	B.P.S.	Date of Birth	Regular Service	Place of Posting	Remarks
1	Zeenat Ali	15	03/03/1970	01/03/1993	GPS Noor Ali, Garhi	
2	Amal Hassan	15	01/08/1970	23/05/1995	GPS Garhi Mandi Khel	
3	Hazmatullah	15	13/02/1972	31/03/2001	GPS Khawas Khel	
4	Ab Majid	15	03/03/1970	01/09/2003	GPS Sarka Ankel	
5	Yaqub Ullah Munawar	15	03/01/1980	01/09/2003	GPS Sarka Mithil	
6	Shah	15	10/03/1983	01/10/2003	GPS Sarka Khel	
7	Absul Shakoor	15	01/03/1973	23/10/2003	GPS Sama Manogol	
8	Sanoor Gul Kh. Alor	15	01/01/1979	29/07/2004	GPS Sangro	
9	Kobzun Mubhammad	15	05/06/1979	03/08/2004	GPS Turapi Ali Khel	
10	Umor	15	22/03/1976	03/09/2005	GPS Ramhite Salar	
11	Abul Asghar	15	16/10/1984	05/09/2005	GPS Khairpur Baor	
12	Wahid Ullah	15	02/02/1979	23/10/2005	GPS Ahmad Khel No. 2	
13	Iqbal Hassan	12	05/03/1985	24/11/2009	GPS Ster Sam	
14	Khalid Jan Mubhammad	12	01/03/1986	24/11/2009	GPS Mir Kalan Khel	
15	Yaqub Mubhammad	12	09/03/1987	24/11/2009	GPS Malang garhi	
16	Hameed Naveed	12	21/12/1982	24/11/2009	GPS Badi Khikhan	
17	Rehman	12	05/10/1985	24/11/2009	GPS Gul Chert	
18	Gul Nazam	12	15/01/1987	03/12/2009	GPS Bilazmat	
19	Dalil Shah Munir	12	01/04/1980	24/11/2009	GPS Bared Khel	
20	Rehman	12	20/05/1984	24/11/2009	GPS Jaha Koda	
21	Gul Rahim	12	05/04/1979	24/11/2009	GPS Kahpa-Samalia	
22	Ashfaq Ali	12	18/05/1985	24/11/2009	GPS Khair Khushia	
23	Muhammad Khan S. Khushia	12	10/04/1984	02/12/2009	GPS Toor Kail	
24	Hussain	12	01/08/1983	24/11/2009	GPS Shamer	
25	Raveez Akbar	12	15/02/1982	24/11/2009	GPS Zikhat	
26	Hussain Asghar	12	10/02/1981	24/11/2009	GPS Palansi	
27	Khan	12	10/05/1986	24/11/2009	GPS Injwar	
28	Shaban Hassan	12	09/04/1987	24/11/2009	GPS Aul Khel Bala	
29	Amjad Khan Sajid	12	15/02/1985	25/11/2009	GPS Turapi Ali Khel	
30	Islam	12	20/01/1986	24/11/2009	GPS Panjam Ali Khel	

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

11	303	Amir ur Rehman	12	03/10/1982	24/11/2009	GPS Khadizai No.1
12	304	Hikmat Khan Khanawar	12	03/10/1983	24/11/2009	GPS Sawara Kol GPS Chappur Mishli
13	306	Muhammad Ghani	12	26/12/1985	24/11/2009	GPS Kiv Ali Khel
14	305	Polatkh Khan	12	15/04/1984	25/11/2009	GPS Yusuf Khel
15	312	Israfil Khan	12	12/05/1986	24/11/2009	GPS Khadizai No.2

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

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

1. Wahid Ullah  
SCT GMS Bagara Mishli  
Member
2. Shakeel Ahmad  
SST GHS Swara Kol  
Member
3. Mr. Abdul Malik  
ADEO Orakzai  
Member
4. Khatir Ali  
ADEO Orakzai  
Member
5. Mr. Wahida Naz  
ADEO Orakzai  
Member
6. Muhammad Iqbal (HM)  
GHS Mishli Bazar  
Member
7. Mr. Rats Khan  
ADEO Orakzai  
Member
8. Saif Ullah Principal  
GHS Mandali  
Member
9. Hamood Ullah Khan  
Additional Director NMD  
KP E&SED Representative
- Mr. Farooq Ullah Mensud  
District Education Officer Orakzai  
(Chairman)

31)	323	Amir Ur Rehman	12	03/10/1972	24/11/2009	GPS Khandi Zai No 1	GHS Swara Khel
32)	304	Hikmat Khan	12	02/10/1983	24/11/2009	GPS Sawara Khel	GMS Baera Khel
33)	306	Munawar Khan	12	25/10/1982	24/11/2009	GPS Koi Ali Khel	GMS Damber Khe
34)	307	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

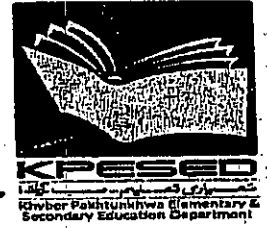
36  
Nil

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: deoorakzai2020@gmail.com



No. 1411 Dated 19/05/2023

**OFFICE ORDER:**

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

S#	NAME	CURRNT PLACE OF POSTING	PLACE OF ADJUSTMENT
1.	Iqbal Hussain	GMS Star Sam	GPS Bara Mela
2.	Khalista 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 Shekhan
5.	Naseeb Rehman	GMS Babra Laaki	GPS Gul Cheri
6.	Gul Karim	GMS Safri Feroz Khel	GPS Ghutak Ali Khel
7.	Dalil Shah	GHS Bazid Khel	GPS Rangin Khel
8.	Mati Ur Rehman	GHS Avi Mela	GPS Dago Takhtak
9.	Gul Rahim	GHS Gullistan	GPS Khee Kada No.1
10.	Ashfaq Ali	GMS Khalil Sepoy	GPS Bal Kot
11.	Maskeen Khan	GMS Damber Lasti	GPS Dran Shekhan
12.	Syed Khadim Hussain	GHSS Andkhel	GMPS Shamer
13.	Raes Akbar	GMS Wampanra	GPS Kagnal Sher Khel
14.	Hussain Asgher	GMS Khalil Sepoy	GPS Khar Khushta
15.	Minawar khan	GHS Saifal Darrah	GPS Arkho 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.	Amr ur Rehman	GHS Swaro Kot	GPS Swaro Kot
20.	Hikmat Khan	GHS Swaro Kot	GPS Khadizai No.1
21.	Munawar Khan	GHS Chapper Mishti	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) TADA 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. 13655-61/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



10-15

DIRECTORATE OF ELEMENTARY &  
SECONDARY EDUCATION, KHYBER  
PAKHTUNKHWA, PESHAWAR  
F.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 PST (BS-12) including 23 others were promoted to the post of CT (BS-15) vide No. 6661-69 Dated 10-12-2020, which is clear cut violation of Service Rules, 2012.

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

AC/10/11/2023  
Assistant Director (Estab)  
Elementary and Secondary Education  
Khyber Pakhtunkhwa

Endst: 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

*withheld letter*  
*AD*  
*26/3/23*

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Page No. 15

DIRECTORATE OF ELEMENTARY &  
SECONDARY EDUCATION KHYBER  
PAKHTUNKHWA

To

The District Education Officer,  
Orakzai at Hangu.

Subject:-

INTER DISTRICT TRANSFER FROM DISTRICT ORAKZAI TO  
DISTRICT HANGU

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

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

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

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

Copy of the above is forwarded to the

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

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





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

Phone # 0925-690017 Fax # 0925-690017

Email: deoorakzal2020@gmail.com

No. 1344 Dated: 09/05/2023



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

Subject: REQUEST FOR REVIEW/APPRaisal

Reference to the Assistant Director (Estab), Elementary & Secondary Education, Khyber Pakhtunkhwa office letter bearing No. 18811, dated 11/04/2023 wherein it is has been directed to withdraw the promotion order of twenty four/24 PSTs BPS: 12 to CT BPS: 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.

Foregoing 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 then the promoted PSTs for promotion to the posts of CT BPS: 15.
- 5) WHEREAS, 60 posts of CT in BPS: 15 (Male) in district Orakzai were lying vacant at the time of DPC in 2020 and those PSTs in BPS: 12 have been promoted under Service Rules 2012 the 60% share of SPS/PSHT to the posts of CT in BPS: 15.
- 6) WHEREAS, the promoted PSTs had already been served on the posts of CTs in BPS: 15 since 11/12/2020 and one of the promoted PST (Mr. Saqib ul Islam) has already obtained the inter district transfer/NOC and serving in District Kohat on the post of CT in BPS: 15.

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

DISTRICT EDUCATION OFFICER (M)  
ORAKZAI

Copy of Even No. & Dats:

Copy forwarded for information and necessary action to the:

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

DISTRICT EDUCATION OFFICER (M)  
ORAKZAI

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

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

District Education Officer (M)  
Orakzai

"D"  
-17-

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR**

APPEAL NO. 1688 /2023



Mr. Munawar Khan, CT (BPS-15),  
GMS Babera, 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 07.08.2023 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 07.08.2023 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/PSG/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 Muhammad Khattak  
Advocate ... For appellant

Mr. Muhammad Jan  
District Attorney ... For respondents.

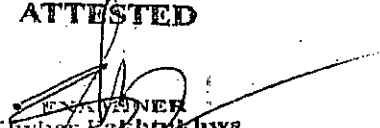
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Date of Institution.....06.06.2023  
Date of Hearing.....08.01.2024  
Date of Decision.....08.01.2024

JUDGMENT

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

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

ATTESTED

  
MEMBER  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

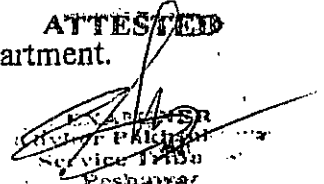
2. Through this judgment we intend to dispose of instant service appeal as well as twenty-three connected service appeals which are given as under:

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

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

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

ATTESTED

  
 Group Officer  
 Service Tribunal  
 Peshawar



Feeling aggrieved, they filed departmental appeals which were rejected on 09.08.2023, hence, the instant service appeals. -20-

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

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

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

ATTESTED

EXAMINER  
 Service Tribunal  
 Peshawar

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

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

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

ATTESTED  
 KIRAN KUMAR  
 Member, Peshawar  
 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). -22-

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  
Khyber Pakhtunkhwa  
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Peshawar



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 8<sup>th</sup> day of January, 2024.

(KALIM ARSHID KHAN)

Chairman

(RASHIDA BANO)

Member (J)

Date of Presentation of Application  
 Number of Writs  
 Copying Fee  
 Urgent  
 Total  
 Name of Copyist  
 Date of Completion

Certified to be true copy

EXAMINED  
 Khyber Pakhtunkhwa  
 Service Tribunal  
 Peshawar

No. 1510Dated: 17/11/2018**Working Papers for Departmental Promotion of PST B-12 to Senior PST B-14****DPC NO.14**

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

535

No. of GPS Schools

272

No. of PTC Teachers to be promoted to BPS 14

15

Net to be promoted

15

Proposed for promotion

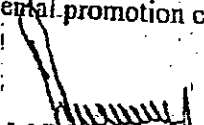
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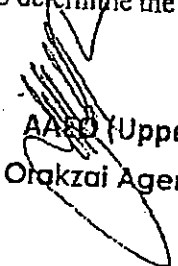
Subject: **List of PTC (Male) for Promotion BPS12- to BPS-14**

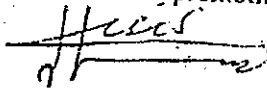
S#	S.L#	Name of Official	Father's Name	Acad. Qual:	Prof. Qual:	BPS	Date of Birth	Date of 1 <sup>st</sup> Appointment	Date of Charge As PTC	Trained W.E.F.	Awarded BPS	Present Post
1	312	Rizwan Khan	Gul Samand	FA	PTC	12	22/06/1969	22/10/2005	24/10/2005	24/10/2005		
2	313	Waris Ali	Syed Asker	FA	PTC	12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

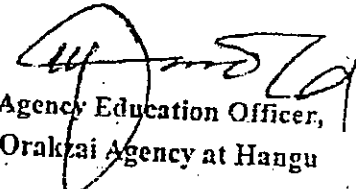
- (a) have been completed the required length of qualifying service and qualification as required for promotion to BPS-14 under the rules.
- (b) Non of them is on deputation to any organization under the Federal/Provincial/Autonomous/Semi autonomous/International organization.
- (c) Neither any disciplinary/departmental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

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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 <sup>st</sup> Apt:	Date of Charge As PTC	Trained W.E.F.	Awarded BPS	Present Post
1.	Mehmood Khafid	Nawab Khan	FA	PTC		14/12/10/1960	29/02/1992	01/03/1992	25/12/1993	15	GPS Boza 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.	Loiq 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	Fazal 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

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	Name of Official	Falher's Name	Acad: Quat:	Prof: Qual:	BPS	Date of Birth	Date of 1 <sup>st</sup> Apt:	Date of Charge As PTC	Trained W.E.F.	Awarded BPS	
7.	Syed Rahman	Yar Saif	FA	PTC		20/06/1972	07/11/1990	12/11/1990	09/01/1995	15	GPS Naka Mela
8.	Sabit Mohanmad	Jawari Mohanmad	FA	PTC		05/05/1967	04/10/1995	05/10/1995	25/05/1996	15	GPS Matang Garhi
9.	Abdul Rahim	Mohammad Rahim	FA	PTC	14	14/03/1979	02/09/2005	03/09/2005	03/09/2005	15	GPS Sama Momozai
10.	Zai Mui 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.

None 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 during the last five years.

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

Their ACRs synopsis are free from adverse remarks.

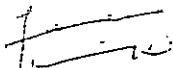
They are all alive and serving.

Their appointment orders against PTCs posts are attached herewith.

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

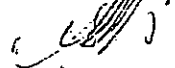
The departmental promotion committee is requested to determine the suitability of the above PTCs for promotion to BPS-15 with effect from 02/01/2017.

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

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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 BPS12- to BPS-14

S#	Name of Official	Father Name	Academic Qualification	Prof. Qual.	BPS	Date of Birth	Date of 1 <sup>st</sup> Appointment	Date of Charge As PTC	Trained W.E.F.	Awarded BPS	Present Post	Remarks
1.	Daud Khan	Abdur Rehman	FA	PTC	12	04/03/1965	15/05/1984	16/05/1984	31/05/1987	14	GPS Sargodha	
2.	Khano Din	Talib Din	FA	PTC	12	03/03/1966	06/06/1994	07/06/1994	07/01/1995	14	GPS Sargodha	
3.	Mohammad Asker	Muzaf 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. Aqeel	FA	PTC	12	02/04/1970	01/08/1985	07/05/1985	09/01/1995	14	GPS Sargodha	
5.	Mohammad Baitar	Abdul Ghafar	FA	PTC	12	13/03/1972	03/10/1995	02/10/1995	25/05/1996	14	GPS Sargodha	
6.	Mohammad Ayaz	Fazal Ali Rehman	FA	PTC	12	03/02/1974	06/11/1994	06/11/1994	11/05/1999	14	GPS Sargodha	FA Result B-8-2015
7.	Anaya Ali	Rehmat Shah	FA	PTC	12	02/02/1974	13/10/1995	13/10/1995	25/05/1996	14	GPS Sargodha	No Service Book
8.	Khano Jari	Jar-on Khan	FA	PTC	12	20/04/1976	04/11/1994	10/11/1994	11/05/1999	14	GPS Sargodha	FA Result B-8-2015
9.	Mohammad Shafiq	Khalid Wazir	FA	PTC	12	25/07/1976	09/05/2002	11/05/2002		14	GPS Sargodha	
10.	Hafizur Rehman	Abdur Rehman	FA	PTC	12							

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

Member

Janat Khan (CT)  
GHS Saital Darrah  
Orakzai Agency

Member

Shakil Ahmad (CT)  
GHS Swaro Kol  
Orakzai Agency

Chairman

Aliq ur Rahman  
Agency Education Officer,  
Orakzai Agency at Hangu

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No: 322

Date:

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

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

-29-

Member



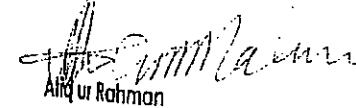
Janat Khan (CT)  
GHS Saifal Darrah  
Orakzai Agency

Member



Shakil Ahmad (CT)  
GHS Swaro Kot  
Orakzai Agency

Chairman



Aliqur Rahman  
Agency Education Officer,  
Orakzai Agency of Hangu

No. 5079/F  
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 Khafid	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 Mirazai
5.	Lalif Khan	Fazal Janan	FA	PTC	06/03/1971	22/11/1989	22/11/1989	09/01/1995	14	GPS Zaino Khel
6.	Afser Khan	Ilyas Khan	FA	PTC	04/05/1971	22/11/1989	02/12/1989	09/01/1995	14	GPS Zowan
7.	Syed Rahman	Yar Shah	FA	PTC	20/06/1972	07/11/1990	12/11/1990	09/01/1995	14	GPS Nako Mela
8.	Sabil Mohammad	Jawani Mohammad	FA	PTC	05/05/1967	04/10/1995	05/10/1995	25/05/1996	14	GPS Malang Garhi
9.	Abdul Hakim	Habibur Rehman	FA	PTC	14/03/1979	02/09/2005	03/09/2005	03/09/2005	14	GPS Sama Mamozai
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 Arghorja
12.	Fazal Mir	Syed Shah	FA	PTC	05/04/1981	02/09/2005	04/09/2005	04/09/2005	14	GPS Chinari Ali Khel
13.	Waris Ali	Gul Jan	FA	PTC	07/03/1972	02/09/2005	05/09/2005	05/09/2005	14	GPS Sara Khuna
14.	Mir Asghar	Sawab Gul	FA	PTC	16/10/1964	02/09/2005	05/09/2005	05/09/2005	14	GPS Talay Akhet
15.	Waheedulla	Noon Bad Sh	FA	PTC	02/02/1979	22/10/2005	23/10/2005	23/10/2005	14	GPS Mir Kalam Khel
16.	Salahuddin	Ajmir Khan	FA	PTC	03/02/1980	22/10/2005	23/10/2005	23/10/2005	14	GPS Chapper Ali Khel

-30-

Member

Janat 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

18/12/16



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OFFICE OF THE AGENCY EDUCATION OFFICER, ORAKZAI AGENCY AT HANGU

No. 2871 Dated: 27/8/2018

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

DPC NO.17

535

Total No. of PTC Posts (Duly verified from AAO) 272

No. of CPS Schools 2

No. of PTC Teachers to be promoted to BPS 14 2

Net to be promoted 2

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

Sr	Name of Official	Teacher's Name	Qualif. Qualif.	Prof. Qualif.	BPS	Date of Birth	Date of 1 <sup>st</sup> Appointment	Date of Charge As PTC	1 <sup>st</sup> Trained W.L.E.	Awarded BPS	Present Post
95	Jemal Khan	Derdah Khan	F4	PTC	12	04/09/1971	30/09/1989	12/10/1989	23/11/1992	14	CPS Mandi
130	Jamroz Khan	Abdur Jan	F4	PTC	12	17/05/1967	10/08/1989	11/08/1989	09/01/1995	14	CPS Mandi

- (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/departamental 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 subject to change.
- (i) The departmental promotion committee is requested to determine the suitability of the above PTCs for promotion to BPS-14 with immediate effect.

Verified by:

AAEO (Central)  
Orakzai Agency

AAEO (Lower)  
Orakzai Agency

Agency Education Officer,  
Orakzai Agency at Hangu

OFFICE OF THE AGENCY EDUCATION OFFICER, ORAKRAL AGENCY AT HANGU

No. 2679 Dated: 21/8/2018

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

Total No. of PTC Posts (Fully verified from AMO) 535

No. of GYS Schools 272

No. of PTC Teachers to be promoted to BPS 15 4

Not to be promoted 1

Proposed for promotion 2

DPC NO 17

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

Sl. No.	Roll No.	Present Position	Grade	Qualification	Grade	Qualification	Grade	Qualification	Grade	Qualification	Grade	Qualification
1	2730	Ermit Khan	PA	04-09-1971	14	04-09-1971	14	04-09-1971	14	04-09-1971	14	04-09-1971
2	2731	Demas Pham	PA	13-05-1962	14	13-05-1962	14	13-05-1962	14	13-05-1962	14	13-05-1962
3												
4												

(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 Government/Autonomous Sector/ Government/ Inter-national organization.  
 (c) neither any disciplinary/procedural/departmental/departmental 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/SS-Retirement leave.

(e) Their ACBs/records are free from adverse remarks.

(f) They are all eligible and serving.

(g) Their appointment orders against PTCs posts are attached herewith.

(h) The Seniority list of PTCs officials is final, undisputed and non-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

*[Signature]*  
 AAEO (Lower)  
 Orakral Agency

*[Signature]*  
 AAEO (Lower)  
 Orakral Agency

*[Signature]*  
 Agency Education Officer,  
 Orakral Agency at Hangu

OFFICE OF THE AGENEY EDUCATION OFFICER, ORAKZAI AGENCY, ATILMANGU

No. 1585

Date: 28/2/2018

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

DPCNO16

Total No. of PTC Cases (Only certified from AAO)

No. of CTS Schools

No. of PTC Teachers to be promoted to BPS 14

Not to be promoted

Proposed for promotion

335

272

3

3

3

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

Sl. No.	Name of Official	Grade	Acad. Dist.	Post	Age	Date of Birth	Date of Last Appointment	Date of Last Change/Avail. PTC	17 months Ave. E. 1997	17 months Ave. E. 1998	CTS Order
1	Sayed Manzoor	PSI	S. Tandon Hansan	B-1	12	14.08.1964	22/08/1998	11/04/1998	09/11/1993	12	CTS Order
2	Habibullah	PSI	S. Tandon Hansan	B-1	12	07/10/1962	30/08/1994	01/02/1994	12.03.1997	12	CTS Order
3	Muhammad Ali	PSI	S. Tandon Hansan	B-1	17	12/08/1971	13/08/1998	12/08/1998	12/08/1998	14	CTS Order

(a) have been completed the required length of qualifying service and qualification as required for promotion in BPS-14 under the rules.

(b) None of them is on deputation to any organization under the Federal/Provincial/Autonomous/Semi autonomous/International organization.

(c) Neither any disciplinary/departamental 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-Politsun 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 non-subject.

(i) The departamental 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, AtilMangu

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OFFICE OF THE AGENCY EDUCATION OFFICER ORAKZAI AGENCY AT HANGLI

No. 1382 / Working Papers for Departmental Promotion of SPT B-14 to Senior SPT B-15

Dated 28/05/2018

Total No. of PTC Posts (Duly verified from AAO) 515

No. of GPS Schools 272

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

Not to be promoted 3

Proposed for promotion 3

DPC NO 16

Subject: List of PTC (Male) for Promotion BPS14 to BPS15

Sr	Name of Official	Age	Qualification	Grade	Post	Date of Birth	Date of Appointment	Date of Promotion	Grade	Post
1	S. Inqilab	42	B.A.	BPS-14	PTC	14/03/1974	10/04/1998	10/04/1998	BPS-15	Senior Teacher
2	Habibullah	42	B.A.	BPS-14	PTC	01/10/1969	30/07/1994	01/05/2004	BPS-15	Senior Teacher
3	Wahid Ali	42	B.A.	BPS-14	PTC	14/08/1973	18/07/1998	18/07/1998	BPS-15	Senior Teacher

- (a) have been completed the required length of qualifying service and qualification as required for promotion to BPS-15 and Senior PTC B-15 under the rules.
- (b) None of them is on deputation to any organization under the Federal/Provincial/Autonomous/semi autonomous/International organization.
- (c) Neither any disciplinary/departmental proceeding/Anti-corruption/Judicial inquiry is pending against them nor has any penalty been imposed upon any one of them during the last five years.
- (d) No one is on long leaves/Pakistan leave.
- (e) Their ACRs synopsis are free from adverse remarks.
- (f) They are all alive and serving.
- (g) Their appointment orders against PTCs posts are attached herewith.
- (h) The Seniority list of B-15 officials is final, undisputed and not 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, Hanjali

Agency Education Office  
Orakzai Agency at Hangu

No. 4103

Date: 22/11/2016

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 QARI (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) PHS-15 and Qari (M/F) to Senior Qari BPS-15 in the light of notification No. B233-60 Dated 8-8-2016, 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. Mubib ur Rehman DDE (Estab) FATA (Member)
3. Mr. Janat Khan CT GHS Saifal Darrah Orakzai Agency (Member)
4. Mr. Shakil Ahmad CT GHS Swara Kot 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 7 AU 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 vogue, the seniority list of PST (M) teachers along with service Books and academic plus professional documents were thoroughly checked and scrutinized. As a result 211 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/Dar-ul-Uloom 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. Mubib 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.



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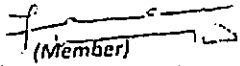
20

(Chairman)

Atiq ur Rahman  
Agency Education Officer,  
Orakzai Agency at Hangu



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



(Member)  
Janat Khan (CT)  
GHS Salfal Darrah



(Member)  
Shakil Ahmad (CT)  
GHS Swara Kot

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

New policy

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P# 07, 11

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Dated 06/08/2020

6

GOVERNMENT OF THE KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

NOTIFICATION

*Peshawar, dated the November 13, 2012.*

No.SO(PE)4-5/SSRC/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;

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(15)

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

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11

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

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

no PTC

(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

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-44-

		<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>

-45-

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

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15

		University with one year vocational training from any Government training center or institute with nine months training from Government Agro Technical Teacher Training center of the level of certified Teacher Agro Technical (Home Economics).		Certified Teacher (Home Economics). <u>Note:</u> In case of non availability of suitable person for promotion, then by initial recruitment.
17.	Drawing Master (BPS-15).	Bachelor's Degree from a recognized University with one year Drawing Master (DM) course Certificate.	18 to 35 years.	(a) Eighty per cent by initial recruitment; and (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.  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.  <u>Note:</u> In case of non-availability of suitable candidate for promotion, then by initial recruitment.



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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 ten years service and having qualification prescribed for initial recruitment of Primary School Teacher.
20.	Senior Primary School Teacher (BPS-14).			By promotion, on the basis of seniority-cum-fitness, from amongst Primary School Teachers

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

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Qari/Qaria

Category of Qualification	Total Marks 100
SSC	Marks obtained X 20 / total marks = ____
Qiri Sanad from a recognized Institution.	Marks obtained X 20 / total marks = ____
HSSC	Marks obtained X 20 / total marks = ____
B.A/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 F.Sc, 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 = ____	
B.A/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.          /2024

Munawar Khan

(APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

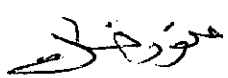
**VERSUS**

Eda Dept

(RESPONDENT)  
(DEFENDANT)

I/We Munawar Khan  
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.          /          /2024

Munawar Khan  


**CLIENT**


**ACCEPTED.**

**NOOR MOHAMMAD KHATTAK  
ADVOCATE SUPREME COURT**

  
**WALEED ADNAN**

  
**UMAR FAROOQ MOHMAND**

&

  
**MAHMOOD JAN  
ADVOCATES**

**OFFICE:**  
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