


## FORM OF ORDER SHEET

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

**Appeal No. 1357/2024**

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	<b>06-Sep-24</b>	<p>The appeal of Mr. Saeed ul Haq submitted today by Mr. Muazam Butt Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 13.09.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHUWA

Saeed-ul-Haq

V/S

Government of KP. & others

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ADVOCATE  
M. Muazzam Butt

- | -

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHUWA**

Service Appeal No 1357 /2024

Saeed Ul Haq Son of Muhammad Shah PSHT,

G.M.P.S Tazu Khel Zaida District Swabi

.....Appellant

**VERSUS**

- 1) Secretary to Government of Khyber Pakhtunkhwa, Establishment Department, Civil Secretariat, Peshawar
- 2) Secretary to Government of Khyber Pakhtunkhwa, Elementary and Secondary Education Department, Civil Secretariat, Peshawar
- 3) Director Elementary and Secondary Education Department

.....Respondents

**SERVICE APPEAL UNDER SECTION 4 OF KPK SERVICE TRIBUNAL ACT 1974, AGAINST THE IMPUGNED NOTIFICATION BEARING NO.SO(POLICY)E&AD/1-3/2020, DATED 06/08/2020, COMMUNICATED TO RESPONDENT NO. 2 VIDE LETTER DATED 06/06/2023, WHEREIN IT WAS STATED THAT SUB RULE 5 OF RULE 7 OF KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT, PROMOTION AND TRANSFER) RULES, 1989 STANDS DELETED**

**PRAYER:**

**ON ACCEPTANCE OF INSTANT SERVICE APPEAL, THE IMPUGNED NOTIFICATION BEARING NO: SO (POLICY) E&AD/1-3/2020, DATED 06/08/2020, COMMUNICATED TO RESPONDENT NO. 2 VIDE LETTER DATED 06/06/2023, MAY BE DECLARED AND ORDERED TO BE STRUCK DOWN BEING VOID AND ULTRA VIRES TO THE CONSTITUTION OF PAKISTAN AND FUNDAMENTAL PRINCIPLES OF NATURAL JUSTICE AND AGAINST THE RIGHTS OF APPELLANT.**

**ANY OTHER RELIEF WHICH THIS HONOURABLE TRIBUNAL DEEMS FIT AND PROPER IN THE CIRCUMSTANCES OF THE CASE MAY ALSO BE GRANTED TO THE APPELLANT.**

**RESPECTFULLY SHEWETH:**

1. That the Respondents Department appointed the Appellant as Primary School Head Teacher.  
Copy of Monthly Salary account is annexed as Annexure A

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2. That as per Khyber Pakhtunkhwa (Appointment/ Promotion/ Transfer) Rules, 1989, as well as in other sister services of the other Provinces and Federation as well, availing of promotion by the employees is always optional and the employees as a matter of right may avail or forego their promotion and the next employee in seniority list is to be promoted.
  3. That some employees specifically have foregone their promotion as they could not serve in the areas where there is no facility of accommodation and no houses of their elders are available to look after them in far-flung and solitary mountainous hard-areas, and as per Section 25 of per KP Civil Servant Act, 1973, rules to the extent of terms and condition is framed by the Chief Minister and such promotion rules are not made applicable with retrospective effect. The rules framed are published in the Gazette notification and part and parcel of KP Civil Servant Appointment, Transfer and Promotion Rules 1989.
  4. That Government of K.P without following the rules position mentioned in Para 6 above promulgated Notification No. SO (Policy) E&AD/1 3/2020, dated 06/08/2020, communicated to Respondent No.2 vide letter dated 06/06/23 wherein it has been made mandatory to the employees to avail the promotion, otherwise, disciplinary action shall be taken against the employees. The impugned Notification is reproduced as under:-

**"Furthermore, those officers/officials who do not comply with promotion order of the competent authority or try to evade promotion through different means shall be proceeded against under Khyber Pakhtunkhwa Civil Servants (Efficiency Discipline) Rules, 2011, please".**

5. That as per notification No. SD (Policy) /EDAD/1- 3/2020 dated 06/08/2020, the right of foregoing of promotion was withdrawn and the Government of Khyber Pakhtunkhwa Establishment Department (Regulation Wing) deleted Rule 7(5) in the Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 vide notification no SOR-VI (E & AD)/1-2/2020 dated 06-08-2020. Copy of notification No. SD (Policy) EV AD/1- 3/2020 dated 06/08/2020 is attached as **Annexure B**
6. That the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar asked for guidance regarding deletion of Rule 7(5) in Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 in respect of which the respondent No. 1 vide its letter No. SO(Policy) E&AD/1-3/2020 dated Peshawar the June 06th, 2023 directed the respondent No 3 (Directorate of Elementary & Secondary Education) that Rule 7(5) in the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 has been deleted vide notification dated 06-08-2020 and ,therefore, no provision exists to decline or forgo promotion and it is obligatory upon every civil servant to accept promotion under every condition. Copy of Impugned Letter dated June 06th, 2023 is attached as **Annexure C**
7. That thereafter the meeting was also held in the office of Additional Secretary Establishment on 06-07-2023 in which it was decided to examine the case properly and submit a self-contained/ consolidated case for onward submission to the Establishment Department for further necessary action. Copy of Minutes of Meeting dated 06-07-2023 is attached as **Annexure D**
8. That the Respondent No.3 i.e. Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa also wrote a letter to the office of Establishment & Administrative Department vide No SO(Primary-M) E&SED/2-2/Appointment Rule/2023 dated 23-08-2023 to reconsider the amendment made in Khyber

- 3 -
1. Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 as it had negatively affected a large number of teachers and especially female teachers. Copy of Letter dated 23-08-2023 is attached as Annexure E
9. That the respondent vide its letter dated 07th of September 2023 directed the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa that necessary guidance has already been provided to the department and therefore no provision exists to decline or forgo promotion and those teachers who do not comply with the promotion order of the competent authority or try to evade promotion through different means shall be proceeded under the Khyber Pakhtunkhwa Civil Servant (Efficiency & Discipline) Rules, 2011. Copy of Impugned letter dated 07-09-2023 is attached as Annexure F
10. That the petitioner feeling aggrieved, filed Representation to the respondents in person, and also approached to respondents through APTA President but the grievances of the appellant have not so far been redressed. Copy of Representation against the said notification is annexed as Annexure G & H
11. That feeling aggrieved from the letters dated 06-06-2023 and 07-09-2023 and the deletion of Rule 7(5) in the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989; the petitioner filed this instant service appeal is filed on the following grounds:-

#### **GROUND:-**

- a. That as per various judgments it is established and settled principle that executive notifications cannot be given retrospective effect. A valid Notification which confers rights is always applicable with prospective effect, however, if an amendment notification that adversely affects the interests of the employees or causes disadvantage to the employee is not tenable in the eyes of law. The notification/guidance dated 06/08/2020 06/06/2023 are liable to be set-aside.
- b. That there are no terms and conditions of service mentioned in the appointment order of the appellant wherein, availing of promotion is mandatory. It is further submitted that employees in the past, have foregone their promotion along with their posting. It is submitted that when domestic and other personal issues do not permit the employees/appellant to avail the promotion order and in that case, the employees who foregone their promotion were allowed not to avail the promotion for a period of 04 years and on second refusal the employees were permanently debarred from availing the facility of promotion during their entire service. Hence the employees himself/herself forebear agonies of foregoing their promotions. As a result, junior to the appellant according to the order of seniority cum fitness are granted promotion to next rank.
- c. That as per Civil Servant laws, promotion is a kind of appointment which is always optional to get promotion or not, hence the impugned notification is void, illegal and against the law and the same to the extent of the appellant is liable to be set-aside.
- d. That it is further submitted that on account of grant of promotion, some employees who are suffering from severe medical ailment or facing acute domestic issues cannot avail promotion with transfer in other areas, therefore, no employee can be compelled to accept the promotion compulsorily which is not beneficial to the employee but if an employee does not avail and get benefit of her promotion it must be optional for the employees as to whether to avail or forego the benefits. Any promotion without willingness of employee is illegal and liable to be set-aside.

- e. That non-availing of promotion and foregoing thereof does not cause loss to the government exchequer and in consequence of foregoing promotion, pave way to the next employee in seniority, aspiring for promotion could be promoted.
- f. That the impugned promotion Notification dated 06/08/2020 communicated on 06/06/2023 is perverse, discriminatory, against the law, pungent and is a blunt blow of hammer on the rights of the appellant. It is not out of place to mention here that the appellant are teachers and have to look after their children as well as ailing dependent family members and in these circumstances in the presence of impugned Notification dated 06/08 /2023 communicated on 06/06/23 would not be able to serve in the department and which shall amount to the snatching of bread and butter of the poor employees

**It is, therefore, humbly prayed that on the acceptance of the instant Service Appeal; the impugned Notification bearing No. SO (POLICY) E&D/1-3/2020 DATED 06/08/2020, communicated to Respondent No.2 by Respondent NO.1, vide letter dated 06/06/2023, may please be declared and ordered to be struck down being Void, Ultra vires to the Constitution of Pakistan and against the fundamental principles of natural justice.**

**It is further prayed that no penal action as proposed and envisaged in letter dated 06/06/2023 may be declared as unlawful, illegal and without having any legal effect.**

**Any other relief, which this honorable Tribunal deems fit and proper in the circumstances of the case, may also be granted to the appellant.**

**AFFIDAVIT:**

I Saeed Ul Haq solemnly declare that the contents of foregoing application are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honorable Court.

Deponent

Through

Appellant

Muhammad Muazzam Butt  
Advocate Supreme Court

Muhammad Adeel Butt  
Advocate High Court

Bassam Ahmad Siddiqui  
Advocate High Court  
LL.M.-Human Rights

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHUWA**

C.M No \_\_\_\_\_ -P of 2024

In Ref to

Service Appeal No \_\_\_\_\_ /2024

*Saeed W Haq*  
**VERSUS**

Secretary to Government of Khyber Pakhtunkhwa, & others

**APPLICATION FOR SUSPENSION OF IMPUGNED NOTIFICATION BEARING NO. SO (POLICY) E&D/1-3/2020 DATED 06/08/2020, COMMUNICATED TO RESPONDENT NO.2 BY RESPONDENT NO.1, VIDE LETTER DATED 06/06/2023 TILL THE FINAL DISPOSAL OF CASE IN HAND.**

Respectfully Submitted:-

1. That the instant application may be treated as part and parcel of service appeal of the appellant.
2. That the appellant has brought a good prima facie case and balance of convenience also lies in favor of the appellant.
3. That there is likelihood success of the appellant in the lis. And if the notification bearing No. So (Policy) E&D/1-3/2020 Dated 06/08/2020, communicated to Respondent No.2 by Respondent No.1, Vide Letter Dated 06/06/2023 is not suspended the appellant would suffer irreparable loss.
4. That valuable rights of the appellant is involved in the case.

In view of the reasons, it is humbly requested that the notification bearing No. So (Policy) E&D/1-3/2020 dated 06/08/2020, communicated to Respondent No.2 by Respondent No.1, Vide Letter Dated 06/06/2023 may kindly be suspended till the final disposal of the main appeal in hand.

**AFFIDAVIT:**

I (the appellant) do hereby solemnly stated on oath that the contents of foregoing application, are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court

*Saeed W Haq*  
Deponent

Through

*Saeed W Haq*  
Appellant

*Muhammad Muazzam Butt*  
Muhammad Muazzam Butt  
Advocate Supreme Court

*Muhammad Adeel Butt*  
Muhammad Adeel Butt  
Advocate High Court

OFFICE OF THE DISTRICT EDUCATION OFFICER, (P.T.O.) MARDAN.

APPOINTMENTS/TRANSFERS.

OFFICE OF D.E.O.

The following appointments/Transfers of P.T.O. candidates hereby ordered in the interest of public service with immediate effect. Fresh candidates will get Rs.560/-M.Fixed plus Index Pay and usual allowances as admissible under the rules. Those candidates who passed the Examinations will be placed in the running pay scale of Rs.560-2-1020 No.7 with usual allowances/Index pay &

Name of candidate/teacher/Father name and address.	School where posted.	Remarks.
Mr. Khan Khalib s/o Mohammad Umar of Khazana Dehri Mardan.	GPS, Salim Khan.	A. Vacant post.
Mr. Alam Zeb s/o Said Gharib Shero Dehri.	GPS, No.1 Mian Khan.	--to--
Mr. Mohammad Farooq s/o Mohammad Ikram Dagi Swabi.	GMPS, Garhi Khan Khel. (Lahor)	--to--
Mr. Marifullah s/o Said Nazeef of Gharib Abad Mardan.	GPS, Ibrahim Khan Killi.	--to--
Mr. Hassan Jamal s/o Zarshad of Koshan Pura (Swabi).	GPS, Parmoli.	--to--
Mr. Zaiwar Khan s/o Bahadar Khan of Ithano Mardan.	GPS, Pirsaddi.	--to--
Mr. Naseer Khan s/o Zardad Patil Khurd. Mda.	GMPS, Qazi Jumat G. Garhi.	--to--
Mr. Inayatullah s/o Habibullah Moh. Tilyan Mardan.	GMPS, Ghala Dher.	--to--
Mr. Ashraf Ali s/o Abdul Qadus of Sard China (Swabi).	GPS, Kaddi. Dagi Swabi.	--to--
Mr. Nasrat Ali s/o Haji Shahzad, of Showan.	GPS, No.2 Shahmansoor.	--to--
Mr. Saifur Rahman s/o Aziz Khan of Shahman Soor, Swabi.	GPS, No.1	--to--
Mr. Habib Gul s/o Abdul Hamid of Trakai.	GMPS, Mir Aftab Banda. Lahor	--to--
Mr. Wilayat Shah s/o Sakawat Shah of Sanga Mardan.	GPS, Sanga Fazli Abad.	--to--
Mr. Gohar Shah s/o Fazil Shah of Aba Khel Babozai, Mardan.	GMPS, Babozai.	--to--
Mr. Faqir Taj s/o Amir Nawas of Dagi.	GMPS, Mangano Gara. (Lot of Pure)	--to--
Mr. Rawaz Khan s/o Raza Khan of Babozai.	GPS, No.1 Mian Khan.	--to--
Mr. Mahmoodul Haq s/o Mohammad Jan of Bicket Gunj.	GMPS, Bagn Colony.	--to--
Mr. Sardan Ali s/o Amir Mohammad Khan of Palo Dehri.	GPS, Nakhra Banda.	--to--
Mr. Ubaid Masah s/o Kamash of Lund Khawao.	GPS, Nuraid Khan. Kalli.	--to--
Mr. Hamidullah s/o Arifullah of Babozai Kat.	GMPS, Dehri Dakheli Matr.	--do--
Mr. Wakeel Zada s/o Abdul Aziz L. Khawar.	GPS, Chancano Khat.	--do--
Mr. Inayatullah s/o Saadullah of Khawao T.	GPS, Toru.	--to--
Mr. Esar Ali s/o Fakhtar Khan of Khawao.	GPS, Khawao.	--to--
Mr. Fazli Wahab s/o Abdul Chafar of Babozai.	GPS, No.1 Kohi Barmol.	--to--
Mr. Shabir Ahmad s/o Sher Mohammad of Mansubdar.	GMPS, Rest House Jalbai.	--to--
Mr. Saheedul Haq s/o Mohammad Shah	GMPS, Tazu Khel Zaida.	--to--

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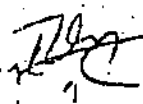
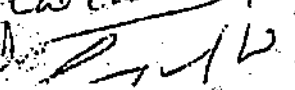
ATTESTED



28. Mr. Waliur Rahman s/o Fazal Rahman of Usman Abad Mardan.	GMPS, Dhoikh Youdaf. A. Vacant post	
29. Mr. Amjid Ali s/o Sabz Ali Katti Garhi.	GPS, No. 2 Kohi Barmol.	--do--
30. Mr. Fazli Maula s/o Amirullah Hamza Dher.	S. GMPS, Beeka.	--do--
31. Mr. Farvez Khan s/o Aslam Khan of Manga.	GPS, Khan Pur.	--do--
32. Mr. Abdur Rauf s/o Ghulam Rasool, of Toru.	GPS, Khoru Banda.	--do--
33. Mr. Khurshed Khan s/o Sikandar Khan of Jalala Mardan.	GPS, Akbar Abad, Katlang.	--do--
34. Mr. Hussain Gul s/o Hamish Gul Takht Bhai.	GPS, Jehangir Abad. T. Bhai.	--do--
35. Mr. Fazli Subhan s/o Fazli Rahim K. I. Zai.	GPS, Mianganoo Cham G.G.	--do--
36. Mr. Afsar Ali s/o Abdul Malik of N. Killi.	GMPS, Manki.	--do--
37. Mr. Momin Khan s/o Mirdad Ghazi Kot Swabi.	GPS, Shumlo Wand Dagi.	--do--
38. Mr. Qamar Zaman s/o Mir Aman Dagi Swabi.	GMPS, Jehangira Gara/	--do--
39. Mr. Raz Mohammad s/o Swar Khan Tariq Abad.	GPS, Barikab Mardan.	--do--
40. Mr. Habibullah s/o Shahzada Harif Khan S.	GMPS, Sardar Abad. Haryan.	--do--
41. Mr. Muntaz Mohammad s/o Amir Mohd of Dehri Safi Mardan.	GMPS, Ashrafud Din Killi.	--do--
42. Mr. Mohammad Nawaz s/o Khalid Khan Jalala.	GPS, Ghazi Shah.	--do--
43. Mr. S. Aurang Zeb s/o Shuaib Badshah of Mohib Banda. Mardan.	GPS, No. 2 Mohib Banda.	--do--
44. Mr. S/Arif Badshah s/o S. Lal Badshah of Mohib Banda.	GPS, Guli Bagh.	--do--
45. Mr. Mohammad Irshad s/o Ayub Khan of Urmal Dehri Swabi.	GMPS, Fazli Abad Tordher S) (Swabi)	--do--
46. Mr. Subhanul Haq s/o Sahib Haq of Qasmi.	GPS, Pipal.	--do--
47. Mr. Riaz Mohammad s/o Baz Mohammad of Dagi Swabi.	GPS, Jalbai.	--do--
48. Mr. Narahat	GMPS, Muchi.	--do--
49. Mr. Ghazi Gul s/o Farid Gul of Dako Baba.	GMPS, Qandaro Killi. T. Bhai	--do--
50. Mr. Sartaj s/o Faqir Gul of Madu Dehri Kat.	GMPS, Kohi Barmol.	--do--
51. Mr. Khanur Rahman s/o Mutabar Khan of Dehri Likpani, Mardan.	GPS, No. 1 Babozai.	--do--
52. Mr. Mohammad Amin s/o Mohammad Israr of Yar Hussain.	GPS, Jalbai.	--do--
53. Mr. Sabz Ali s/o Said Afzal Qasim Swabi.	GPS, Jalbai.	--do--
54. Mr. Faqir Hussain s/o Gul Hassan Kalu Dher.	GMPS, Sumbal Pehur.	--do--
55. Mr. Mohammad Ibrahim s/o Rammatullah of Tordher Mardan.	GMPS, Fazli Abad Maday Baba.	--do--
56. Mr. Khista Rahman s/o Faqir Haq of Lund Khawar.	GPS, Fir Killi (S. Garh).	--do--
57. Mr. Sahib Gul s/o Badshah Gul of Jamal Garhi.	GMPS, Badar Banda.	--do--
58. Mr. Said Ghani s/o Hamish Gul Ohargali.	GPS, Ali Mardan.	--do--
59. Mr. Shiukat Ali s/o Awaldad of Dagi Swabi.	GMPS, Neke Khel Topi.	--do--
60. Mr. Faizul Wahab s/o Husnul Manb of Mohib Banda Mardan.	GMPS, Nawar Killi Jundai.	--do--
61. Mr. Sabz Ali Khan s/o Ibrahim Khan of Mohib Banda.	GPS, Sokai.	--do--
62. Mr. Sanauallah s/o Shamsur Rahman of Yar Hussain.	GMPS, Khazan Kalabat.	--do--
63. Mr. Khawaja Mohammad Younis s/o Mohammad Ismail of Rustan.	GPS, Rustan.	--do--

ATTESTED

65. Mr. Zahir Shah s/o Animilla of Shahdand Mardan.	GPS, No. 2 Mian Khan.	A. Vacant
66. Mr. Mohammad Qasim s/o Ali Akbar L. Khawar.	GPS, No. 2 Mian Khan.	--do--
67. Mr. Mohammad Naqom s/o Abdul Qayum of Mardan.	GPS, Labour Colony.	--do--
68. Mr. Fazli Hadi s/o Abdul. Maktom Fano Swabi.	GPS, No. 1 Thano.	--do--
68. Mr. Mohibur Rahman Abdur Rahman of Shahbaz Garhi.	GMPS, Qayum Abad.	--do--
69. Mr. Fayz Ahmad s/o Ali Haider of Toru.	GMPS, Ghulam Haider Kili.	--do--
70. Mr. Hayatur Rehman s/o Sahib Gul of Shahdad Killi, Swabi.	GMPS, Jalbai.	--do--
71. Mr. Amir Nawaz s/o Noor Farast Khan of Jamal Garhi.	GMPS, Yazal Killi, Manga.	--do--
72. Mr. Azam Khan s/o Miran Shah of Kati Garhi.	GPS, Baido Killi.	--do--
73. Mr. Mohammad Javed Iqbal s/o Gul Zamir of Lund Khawar.	GPS, Nazdoor Abad S. Batkhal.	--do--
74. Mr. Mohammad Naeem s/o Mohammad Shafi of Rustam.	GPS, Garoo, Rustam.	--do--
75. Mr. Sartaj s/o Knista Kalam of K. D. Zai.	GPS, Akbar Abad, Chamtar.	--do--
76. Mr. Fazli Amin s/o Furdil Khan of G. Kapura.	GPS, Aslam Banda.	--do--
77. Mr. Salahud Din s/o Riazud Din of Jamal Garhi.	GMPS, Falo Wand, Badar.	--do--
78. Mr. Misal Khan s/o Qadir Khan of Kudari.	GMPS, Mian Jumat S. Baig.	--do--
79. Mr. Said Mahmood s/o Said Afzal of Ghala Banda.	GPS, Shah Baig.	--do--
80. Mr. Luoman Khan s/o Hakeem Fazli Naula of Kalu Khan.	GPS, No. 2 Kunda.	--do--
81. Mr. Muttahir Shah s/o Ali Haider of Gadsar.	GPS, Chak Raja, Rustan.	--do--
82. Mr. Intiaz Ali s/o Sacha Sharaf of Lund Khawar.	GMPS, Kamalaspaula.	--do--
83. Mr. Sabir Ali s/o Abdul Ghafoor of Lund Khawar.	GMPS, Toji Malik B. Kharki.	--do--
84. Mr. Abdul Qadir s/o Abdus Sattar of Lund Khawar.	GMPS, Saddud Din Killi. (Gumbat).	--do--
85. Mr. Noorul Hassan s/o Rahmanud Din of Pati Kalan Mardan.	GMPS, Shamand Roz.	--do--
86. Mr. Abdul Weli Khan s/o Zur Gul of Narshak.	GPS, Mirzaki.	--do--
87. Mr. Hazrat Nabi s/o Shor Ali of Gaddar Mardan.	GMPS, Bakri Banda.	--do--
88. Mr. Mohammad Naeem s/o Mohammad Hamsun of Far Hoti.	GMPS, Shahi Bagh.	--do--
89. Mr. Shafiullah s/o Absanullah of Ghundo.	GPS, Ghundo.	Vice S. No.
90. Mr. Nizamud Din s/o PTC	GPS, Ghundo.	Vice S. No.
91. Mr. Mazafar Khan s/o	GPS, Dramandoona.	GPS, Mamoti Katlang. A. N. C. Post.
92. Mr. Khan Behadar, PTO	GPS, Redawan. (Swabi)	GPS, Balzo Kharki. A. V. Post.

Checked by   


ATTEN

9

Note:-

1. No TA/DA or PC is allowed.
2. The appointments are purely temporary, liable to termination without any notice or assigning any reason.
3. Original certificates of SSC of all the candidates be checked B.D.S.G. concerned. Age limit is 18 to 25 years. No pay should be drawn for the candidates if they are less than 18 years and exceed 25 years. Relaxation cases if any be submitted to this office.
4. Charge reports should be submitted to all concerned.
5. The candidates should be obtained Age & Health Certificate from the Medical Supdt: D.S.G. Hospital Mardan.
6. The appointment of those candidates who were on study leave during their PTC training should be considered from 1.9.1986.FN.

(Gul Zaman Khan)  
 District Education officer,  
 (Male) Mardan.

Enclst: No. 18578/General /PTC Mardan/Swabi Dt, Mardan the, 17.9.86.

Copy of the above is forwarded to the:-

All the H/Instror, H/Teacher of concerned schools.

(Signature)  
 District Education officer,  
 (Male) Mardan.

Enclst: No. 18579-CC

Copy of the above is forwarded for information to the:-

1. Director of Education (Schools) Peshawar.
2. Divisional Director of Education Peshawar Division Peshawar.

(Signature)  
 District Education officer,  
 (Male) Mardan.

"HAYAT"  
 17/9/86

(Signature)  
 (Signature)  
 17/9/86

19/6/15

**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) SWABI  
ADJUSTMENT OF PRIMARY SCHOOL HEAD TEACHER.**

Consequent upon the promotion order issued vide notification Order No 1804-G dated 29.02.2013, the following male Primary School Head Teacher OPS-15 are hereby adjusted against the posts of Primary School Head Teachers in the schools noted against their names on the terms and conditions given below in the best interest of public service v.c.f. 07.02.2013.

Slr	Sr. No.	Name of Teacher	Name of Present School	Name of school where Adjusted	Remarks
1	1	Ilum Khan	GPS No 1 Gubbra	GPS No 1 Gubbra	Adjusted ag. V.PSHT Post
2	4	Zachad	No.3 Mandi	GPS No.3 Mandi	Adjusted ag. V.PSHT Post
3	7	Sahar Ali	GPS Rahat Kotay	GPS Motib Ullah Mandi	Adjusted ag. V.PSHT Post
4	8	Amir Jahan	GPS Hama Abad	GPS Hama Abad	Adjusted ag. V.PSHT Post
5	10	Sadique Ali	GPS No 2 Akka Khel Mandi	GPS No 2 Akka Khel Mandi	Adjusted ag. V.PSHT Post
6	12	Muhammad Ullah	GPS No 1 Gubbra	GPS No 1 Gubbra	Adjusted ag. V.PSHT Post
7	13	Fazal Ghani	GPS Hama	GPS Hama	Adjusted ag. V.PSHT Post
8	14	Sahar Ali Khan	GPS Hama Dher	GPS Hama Dher	Adjusted ag. V.PSHT Post
9	15	Muhammad Saifur	GPS No 2 Tapa	GPS No 2 Tapa	Adjusted ag. V.PSHT Post
10	17	Sahar Rehman	GPS Hama Jandari	GPS Hama Jandari	Adjusted ag. V.PSHT Post
11	18	Muhammad Javed	GPS Hama	GPS Hama	Adjusted ag. V.PSHT Post
12	19	Muhammad Javed	GPS No 1 Akka Dher	GPS No 1 Akka Dher	Adjusted ag. V.PSHT Post
13	20	Muhammad Javed	GPS Hama Dher	GPS Hama Dher	Adjusted ag. V.PSHT Post
14	21	Amir Jahan	GPS Hama	GPS Hama	Adjusted ag. V.PSHT Post
15	22	Amir Jahan	GPS Hama Jandari	GPS Hama Jandari	Adjusted ag. V.PSHT Post
16	23	Amir Jahan	GPS Hama	GPS Hama	Adjusted ag. V.PSHT Post
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18	25	Amir Jahan	GPS Hama	GPS Hama	Adjusted ag. V.PSHT Post
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112	119	Amir Jahan	GPS Hama	GPS Hama	Adjusted ag. V.PSHT Post

73	Alabd Ghannar	Gps Lalor Ghannar	Gps Qara Abad	Adjusted ag. V.PSHT Post
74	Muhammad Nurban	Gps Karim Sher Kib	Gps Karim Sher Kib	Adjusted ag. V.PSHT Post
75	Mahabat Khan	Gps No 4 Iordier	Gps No 4 Iordier	Adjusted ag. V.PSHT Post
76	Muhammad Khan	Gps Nara Hamla	Gps Nara Hamla	Adjusted ag. V.PSHT Post
77	Shir Aziz Khan	Gps Nara	Gps Nara	Adjusted ag. V.PSHT Post
78	Fazl Amin	Gps No 2 Swabi	Gps No 2 Swabi	Adjusted ag. V.PSHT Post
79	Muhammad Khan	Gps Ganda	Gps Ganda	Adjusted ag. V.PSHT Post
80	Amir Khan	Gps Dada	Gps Dada	Adjusted ag. V.PSHT Post
81	Amir Shah	Gps Kamela	Gps Kamela	Adjusted ag. V.PSHT Post
82	Muhammad Aslam Khan	Gps wab Mand Karona	Gps wab Mand Karona	Adjusted ag. V.PSHT Post
83	Muhammad Khan	Gps No 1 Swabi	Gps No 1 Swabi	Adjusted ag. V.PSHT Post
84	Dama Jaran	Gps Marghat	Gps No 2 Jang Dner	Adjusted ag. V.PSHT Post
85	Muhammad Ahmad	Gps Marghat	Gps No 1 Anbar	Adjusted ag. V.PSHT Post
86	Said Chahar	Gps Hacen Shah Korona	Gps shaga wari	Adjusted ag. V.PSHT Post
87	Muhammad Ali	Gps No 2 Shawa	Gps No 2 Shawa	Adjusted ag. V.PSHT Post
88	Muhammad Ishaq	Gps Harf Ullah k	Gps Sano-2	Adjusted ag. V.PSHT Post
89	Muhammad Khan	Gps Umran Abad	Gps Umran Abad	Adjusted ag. V.PSHT Post
90	Sabz Ak	Gps Shehadat Kib	Gps Shehadat Kib	Adjusted ag. V.PSHT Post
91	Fazal Qadir	Gps ChachiyanoKib	Gps ChachiyanoKib	Adjusted ag. V.PSHT Post
92	Gaferi id Han	Gps Gar Panj pir	Gps Gar Panj pir	Adjusted ag. V.PSHT Post
93	Amir Khan	Gps Marghat	Gps No 2 Anbar	Adjusted ag. V.PSHT Post
94	Muhammad Ahmad	Gps Mianan	Gps Mianan	Adjusted ag. V.PSHT Post
95	Amir Khan	Gps Dam Khet Lar	Gps No 1 Ban Khet	Adjusted ag. V.PSHT Post
96	Muhammad Zeb	Gps Taraki	Gps Taraki	Adjusted ag. V.PSHT Post
97	Amir Zahir	Gps No 3 Tand kol	Gps No 3 Tand kol	Adjusted ag. V.PSHT Post
98	Amir Rehman	Gps No 2 Panjpir	Gps No 2 Panjpir	Adjusted ag. V.PSHT Post
99	Muhammad Khan	Gps Zaidat Banda O. Taraki	Gps Zaidat Banda O. Taraki	Adjusted ag. V.PSHT Post
100	Muhammad Khan	Gps Maranj	Gps Maranj	Adjusted ag. V.PSHT Post
101	Amir Khan	Gps Karim Sher Kib	Gps Adia KSK	Adjusted ag. V.PSHT Post
102	Amir Khan	Gps No 1 Adina	Gps No 1 Adina	Adjusted ag. V.PSHT Post
103	Said Qadir	Gps Landay Cham Panjpir	Gps Landay Cham Panjpir	Adjusted ag. V.PSHT Post
104	Zar Muhammad	Gps No.1 Shah Mansoor	Gps No.1 Shah Mansoor	Adjusted ag. V.PSHT Post
105	Zar Dost Khan	Gps Manal Payan	Gps Manal Payan	Adjusted ag. V.PSHT Post
106	Said id Alwar	Gps No 1 Khoro	Gps No 1 Khoro	Adjusted ag. V.PSHT Post
107	Muhammad Khan	Gps Jangal Khet	Gps Jangal Khet	Adjusted ag. V.PSHT Post
108	Muhammad Khan	Gps Panjman	Gps Panjman	Adjusted ag. V.PSHT Post
109	Fahim Bahadar	Gps No 2 Yand Lal	Gps No 2 Yand kol	Adjusted ag. V.PSHT Post
110	Muhammad Khan	Gps Fozal Abad	Gps Fozal Abad	Adjusted ag. V.PSHT Post
111	Muhammad Khan	Gps No 1 Zinda	Gps No 1 Zinda	Adjusted ag. V.PSHT Post
112	Fazal Qadir	Gps Supadar	Gps Supadar	Adjusted ag. V.PSHT Post
113	Muhammad Rashid	Gps Samakhan Abad	Gps Khudab Abad	Adjusted ag. V.PSHT Post
114	Muhammad Khan	Gps No 2 Kabi Khan	Gps No 2 Kabi Khan	Adjusted ag. V.PSHT Post
115	Muhammad Khan	Gps-1 Sano	Gps-1 Sano	Adjusted ag. V.PSHT Post
116	Muhammad Khan	Gps No 2 Rokhani	Gps No 2 Rokhani	Adjusted ag. V.PSHT Post
117	Muhammad Tariq	Gps No 5 Shawa	Gps No 5 Shawa	Adjusted ag. V.PSHT Post
118	Muhammad Khan	Gps Harf	Gps Harf	Adjusted ag. V.PSHT Post
119	Muhammad Khan	Gps No 1 Kataba	Gps No 1 Kataba	Adjusted ag. V.PSHT Post
120	Muhammad Khan	Gps 2 Bakayana	Gps 2 Bakayana	Adjusted ag. V.PSHT Post
121	Muhammad Khan	Gps Karim Sher Kib	Gps No 3 Sher Dara	Adjusted ag. V.PSHT Post
122	Fazal Qadir	Gps Mubab Banda Taraki	Gps Mubab Banda Taraki	Adjusted ag. V.PSHT Post
123	Muhammad Nazir	Gps Ghazi Kot	Gps Ghazi Kote	Adjusted ag. V.PSHT Post
124	Muhammad Khan	Gps Majar Banda	Gps Majar banda	Adjusted ag. V.PSHT Post
125	Muhammad Khan	Gps No.1 Adina	Gps No 1 Kurat	Adjusted ag. V.PSHT Post
126	Muhammad Khan	Gps Shekh Dheri	Gps Shekh Dheri	Adjusted ag. V.PSHT Post
127	Muhammad Khan	Gps No 1 Kataba	Gps Dusan Khet	Adjusted ag. V.PSHT Post
128	Muhammad Khan	Gps No.2 Kadal	Gps No.2 Kadal	Adjusted ag. V.PSHT Post
129	Muhammad Khan	Gps Jamra	Gps Jamra	Adjusted ag. V.PSHT Post
130	Muhammad Khan	Gps Jamra	Gps Jamra	Adjusted ag. V.PSHT Post
131	Muhammad Khan	Gps Saloom Khan Jandee	Gps Fozal Qudoom Banda	Adjusted ag. V.PSHT Post
132	Muhammad Khan	Gps Samakhan Abad	Gps No 2 Ghudamp	Adjusted ag. V.PSHT Post
133	Muhammad Khan	Gps No 3 Yar Hussain	Gps No 3 Yar Hussain	Adjusted ag. V.PSHT Post
134	Muhammad Khan	Gps (Ghara) (fi)	Gps Gabani	Adjusted ag. V.PSHT Post
135	Muhammad Khan	No 2 Manli	Gps No.2 Manli	Adjusted ag. V.PSHT Post
136	Muhammad Khan	Gps (Ghara) (fi)	Gps (Ghara)	Adjusted ag. V.PSHT Post
137	Muhammad Khan	Gps Rana Ghazi	Gps Rana Ghazi	Adjusted ag. V.PSHT Post
138	Muhammad Khan	Faqir Karona	Gps Faqr Karona	Adjusted ag. V.PSHT Post
139	Muhammad Khan	Gps No 2 Chana (G)	Gps Serai Chana	Adjusted ag. V.PSHT Post
140	Muhammad Khan	Gps No 1 Panj pir	Gps No 1 Panj pir	Adjusted ag. V.PSHT Post
141	Muhammad Khan	Gps No 1 Swabi	Gps Gola Dheri	Adjusted ag. V.PSHT Post
142	Muhammad Khan	Gps Badara qha Warata Dargi	Gps Badar qha Warata Dargi	Adjusted ag. V.PSHT Post
143	Muhammad Khan	Gps No.1 S.Chana	Gps Jangal	Adjusted ag. V.PSHT Post
144	Muhammad Khan	Gps Marghat	Gps No 3 Kunda	Adjusted ag. V.PSHT Post
145	Muhammad Khan	Gps Jato Dandada	Gps Jato Dandada	Adjusted ag. V.PSHT Post
146	Muhammad Khan	Gps Muhammad ali (Dara)	Gps Muhammad ali (Dara)	Adjusted ag. V.PSHT Post
147	Muhammad Khan	Gps No 2 Uja	Gps No 2 Uja	Adjusted ag. V.PSHT Post
148	Muhammad Khan	Gps No.2 Swabi	Gps Seen Khet	Adjusted ag. V.PSHT Post
149	Muhammad Khan	Gps No 2 Zandi	Gps No 2 Zandi	Adjusted ag. V.PSHT Post

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- 12 -

Dist. Govt. NWFP-Provincial  
District Accounts Office Swabi  
Monthly Salary Statement (March-2024)

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**Personal Information of Mr SAEED UL HAQ d/w/s of MUHAMMAD SILAH**

Personnel Number: 00234696      CNIC: 1620209407185      NTN: 0  
Date of Birth: 01.01.1966      Entry into Govt. Service: 20.09.1986      Length of Service: 37 Years 06 Months 013 Days

**Employment Category: Active Permanent**

Designation: PRIMARY SCHOOL HEAD TEACH      80004527-DISTRICT GOVERNMENT KHYBE  
DDO Code: SU6130-Government Primary Schools (Male) Swabi  
Payroll Section: 003      GPF Section: 001      Cash Center: 36  
GPF A/C No:      Interest Applied: Yes      GPF Balance: 101,541.00  
Vendor Number:      Pay and Allowances:      Pay scale: BPS For - 2022      Pay Scale Type: Civil      BPS: 17      Pay Stage: 28

Wage type		Amount	Wage type		Amount
0001	Basic Pay	79,360.00	1001	House Rent Allowance 45%	3,524.00
1210	Convey Allowance 2005	2,856.00	1300	Medical Allowance	1,500.00
1505	Charge Allowance	40.00	2148	15% Adhoc Relief All-2013	1,020.00
2199	Adhoc Relief Allow 10%	727.00	2316	Teaching Allowance 2021	1,224.00
2341	Dispr. Rel All 15% 2022KP	7,605.00	2347	Adhoc Rel All 15% 22(PS17)	7,605.00
2378	Adhoc Relief All 2023 35%	27,083.00			0.00

**Deductions - General**

Wage type		Amount	Wage type		Amount
3015	GPF Subscription	-4,290.00	3501	Benevolent Fund	-1,200.00
3609	Income Tax	-4,176.00	3990	Emp.Edu. Fund KPK	-135.00
4004	R Benefits & Death Comp.	-600.00			0.00

**Deductions - Loans and Advances**

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	565,000.00	-15,695.00	549,305.00

**Deductions - Income Tax**

Payable: 65,578.38      Recovered till March-2024: 36,659.00      Exempted: 16,393.78      Recoverable: 12,525.60

**Gross Pay (Rs.): 134,544.00      Deductions: (Rs.): -26,096.00      Net Pay: (Rs.): 108,448.00**

Payee Name: SAEED UL HAQ  
Account Number: 12073-9  
Bank Details: HABIB BANK LIMITED, 220201 SAWABI SAWABI,

Leaves:      Opening Balance:      Availed:      Earned:      Balance:

Permanent Address: VII.L AND PO PANJPIR SWABI      Domicile: NW - Khyber Pakhtunkhwa      Housing Status: No Official  
City: SWABI  
Temp. Address:      Email:      City:

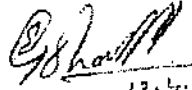
(232428)26.03.2024/09:38:47) 2) All amounts are in Pak Rupees 3) Errors & omissions excepted

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مکملہ مدرسہ 53-18653 آگے آئندہ زرد فٹنگ اسٹریٹ ایجوکیشن آفیسر  
 20.9.86  
 (مردانہ) مدرسہ ازین میں سید الحق کی تقریبی پرائیویٹ ٹیچنگ پرائز  
 سکول میں پورے کی پے رس ناریں عید کے مکمل چارج آج شروع  
 20/9/86 کو مکمل زرد فٹنگ لیا

دستخط سید نجیر

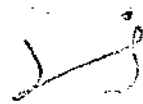
چارچ بورد

  
 13.5.82  
 Head Master  
 Govt. Primary School  
 Paojhar (Swabi)

Nov 54/1

20.9.86



  
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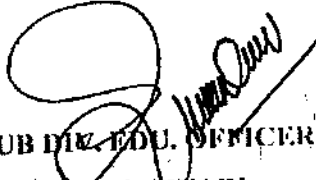
**SUB DIVISIONAL EDUCATION OFFICER (MALE) SWABI**

**SERVICE CERTIFICATE**

It is certified that MR. SAEED UL HAQ, has been serving in Elementary & Secondary Education Department, since 20-09-1986 on PST (BPS-12) post

Recently he is performing his duty as a PSHT (BPS-15) post, w.e.f. 07-02-2013 at Govt. Primary School Gar Panjpir Swabi.

His work is quite satisfactory.

  
SUB DIV. EDU. OFFICER  
(MALE) SWABI  
Sub-Divisional Education  
Officer Male Swabi

  
ATTESTED



Annexure - B -

GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT  
(REGULATION WING)

NOTIFICATION

Dated Peshawar, the, 06 / 8 / 2020

Policy) E&A/11-3/2020: In exercise of the powers conferred by section 25 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973) the Chief Minister of Khyber Pakhtunkhwa is pleased to direct that in the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the following further amendment shall be made, namely:

AMENDMENT

In rule 7, sub-rule (5) shall be deleted.

CHIEF SECRETARY  
GOVERNMENT OF THE KHYBER PAKHTUNKHWA

ODD NO & EVEN DATE

Copy is forwarded to:-

1. Additional Chief Secretary, Govt. of Khyber Pakhtunkhwa, Planning & Development Department.
  2. The Senior Member Secretaries to Govt. of Khyber Pakhtunkhwa.
  3. All Administrative Secretaries to Govt. of Khyber Pakhtunkhwa.
  4. The Principal Secretary to Governor, Khyber Pakhtunkhwa.
  5. The Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
  6. All Divisional Commissioners in Khyber Pakhtunkhwa.
  7. All Heads of Attached Departments in Khyber Pakhtunkhwa.
  8. All Autonomous/Semi Autonomous Bodies in Khyber Pakhtunkhwa.
  9. All Deputy Commissioners in Khyber Pakhtunkhwa.
  10. The Registrar, Peshawar High Court, Peshawar.
  11. The Registrar, Khyber Pakhtunkhwa Service Tribunal, Peshawar.
  12. The Secretary, Khyber Pakhtunkhwa Public Service Commission, Peshawar.
- The Deputy Director (IT), E&A Department.  
All Section Officers in Establishment & Administration Department.  
The Section Officer (Admn), Administration Department with the request to arrange 20 gazette copies.  
The Caretaker, Administration Department.

1267  
06/08/20

(WAJDAH LATIF)  
DEPUTY SECRETARY (POLICY)

ATTESTED

Attested

ATTESTED

-16-

GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT  
(REGULATION WING)

NOTIFICATION

Dated Peshawar the, 06/08/2020

In exercise of the powers conferred by section 26 of the Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No XVIII) the chief Minister of Khyber Pakhtunkhwa is pleased to direct that in the Khyber Pakhtunkhwa Civil Servants (Appointment Promotion and Transfer) Rules 1989, the following further amendment shall be made, namely:

AMENDMENT

In rule 7, sub-ruler (5) shall be deleted.

CHIEF SECRETARY  
GOVERNMENT OF THE KHYBER PAKHTUNKHWA

(ANDS): & EVEN DATE

Copy is forwarded to:

1. Additional Chief Secretary, Govt of Khyber Pakhtunkhwa. Planning & Development Department)
2. The Senior Member Board of Revenue, Khyber Pakhtunkhwa.
3. All Administrative Secretaries to Govt of Khyber Pakhtunkhwa.
4. The Principal Secretary to Governor, Khyber Pakhtunkhwa.
5. The Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
6. All Divisional Commissioners in Khyber Pakhtunkhwa.
7. All Heads of Attached Departments in Khyber Pakhtunkhwa.
8. All Autonomous/Semi Autonomous Bodies in Khyber Pakhtunkhwa.
9. All Deputy Commissioners in Khyber Pakhtunkhwa.
10. The Registrar, Peshawar High Court, Peshawar.
11. The Registrar, Khyber Pakhtunkhwa Service Tribunal, Peshawar
12. The Secretary, Khyber Pakhtunkhwa Public Service Commission, Peshawar.
13. The Deputy Director (IT), E&A Department.
14. All Section Officers in Establishment & Administration, Department.
15. The Section Officer ( Admin), Administration Department with the request to arrange 20 gazette copies.
16. The Caretaker, Administration Department.

(WARDAH LATIF  
DEPUTY SECRETARY (POLICY)



ATTESTED

Annexure - C



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT  
No. 47(Policy) (E&D) / 372020  
Dated Peshawar the June 06, 2023

62

To: The Government of Khyber Pakhtunkhwa,  
Elementary & Secondary Education Department.

Subject: GUIDANCE REGARDING DELETION OF RULE 7(5) IN THE  
KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT,  
PROMOTION AND TRANSFER) RULES, 1982.

Dear Sir,

I am directed to refer to your letter No. SO(Policy-MY/EA/1112/2-  
2/Appointment/2023 dated 18.04.2023 on the subject noted above and to state that Sub-Rule  
(5) of Rule-7 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer)  
Rules, 1982 stands deleted vide this department notification dated 04.08.2020. Thus, no  
provision exists to decline or forgo promotion.

2. The basic rationale behind the deletion of the said rule is aimed at preventing a  
civil servant from temptation for illicit gain by seeking to a single lucrative post/position or to  
prevent those who tend to forgo promotion to evade posting/transfer or show lack of capacity  
to tackle higher responsibilities in case of promotion. Therefore, it is obligatory upon every  
civil servant to accept promotion in every condition.

3. Furthermore, those officers/officials who do not comply with promotion order  
of the competent authority or try to evade promotion through different means shall be  
proceeded against under Khyber Pakhtunkhwa Civil Servants (Efficiency & Discipline) Rules,  
2011, please.

Yours faithfully,

(Issa Nishtar) (Chau)  
Secretary (Policy)

ASE  
7/6

Encl. Of even No & date  
Copy forwarded to:-

1. PS to Special Secretary (Reg), Establishment Department.
2. PA to Additional Secretary (Reg-II), Establishment Department.
3. PS to Deputy Secretary (Policy), Establishment Department.

8/1/23

7/6

Section Officer (Policy)

ATTESTEE

To, The Government of Khyber Pakhtunkhwa,  
Elementary & Secondary Education Department.

SUBJECT: GUIDANCE REGARDING DELETION OF RULE 9(5)  
IN THE KHYBER PAKHTUNKHWA CIVIL  
SERVANTS (APPOINTMENT, PROMOTION AND  
TRANSFER) RULES 1989.

Dear Sir,  
I am directed to refer to your letter No. 80 (Primary-M) / EE, SED / 2-2 / Appointment / 2023 dated 18.04.2023 on the subject noted above and to state that sub-Rule (5) of Rule-7 of Khyber Pakhtunkhwa Civil Servants (Appointments, Promotion and Transfer) Rules, 1989 stands deleted vide this department notification dated 06.08.2020; thus, no provision exists to decline or forgo promotion.

2. The basic rationale behind the deletion of the said rule is aimed to preventing a civil servant from temptation for illicit gain by sticking to a single lucrative post/position or to prevent those who tend to forgo promotion to evade posting/transfer or show lack of capacity to tackle higher responsibilities in case of promotion. Therefore, it is obligatory upon every civil servant to accept promotion in every condition.

3. Furthermore, those officers/officials who do not comply with promotion order of the competent authority or try to evade promotion through different means shall be proceeded against under Khyber Pakhtunkhwa Civil Servants (Efficiency & Discipline) Rules, 2011, please.

ATTES

-19-

-B/C-

Yours faithfully,

(Issa Muhammad Khan)  
Section Officer (Policy)

Enclst: Of ever: No Ep date

Copy forwarded to the :-

1. PS to Special Secretary (Reg), Establishment Department.
2. PA to Additional Secretary (Reg-II), Establishment Department.
3. PS to Deputy Secretary (Policy), Establishment Department.

Section Officer  
(Policy)

f

ATTESTED



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
CIVIL SECRETARIAT PESHAWAR  
(Phone No. 091-9223587)

No. SO (Primary-M)/E&SED/2-6/2023  
Dated Peshawar Ito. June 26<sup>th</sup>, 2023

To

The Director  
Elementary & Secondary Education Department  
Khyber Pakhtunkhwa, Peshawar.

Aziz Ullah Khan  
President  
All Primary Teacher's Association, KP

*[Handwritten Signature]*  
26/6/23

**Subject: GUIDANCE REGARDING DELETION OF RULE 7(5) IN THE KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT, PROMOTION AND TRANSFER) RULES, 1989.**

I am directed to refer to the subject noted above and to enclose here with a letter of Establishment Department letter No. SO (Policy)E&AD/1-3/2020 dated 06 June, 2023 and to state that the subject meeting is to be held on 06 July, 2023 at 11:00-AM in this department under the Chairmanship of Additional Secretary (E&SE) Department in his office.

2. You are, therefore, requested to depute a representative of your respective Department to attend the meeting on a date, time & venue as mentioned above, please.

Encl: AA

*[Handwritten mark]*

*[Handwritten Signature]*  
(MUHAMMAD ISHAQ)  
SECTION OFFICER (PRIMARY MALE)

Copy forwarded to the:

1. PS to Secretary, E&SE Department Khyber Pakhtunkhwa.

*[Handwritten mark]*

*[Handwritten Signature]*  
SECTION OFFICER (PRIMARY MALE)  
26/6/23

*[Handwritten Signature]*

ATTESTED

B/c

-21-

No SO (Primary-M)/E&SED/2-6/2023  
Dated Peshawar the June 25<sup>th</sup> 2023

To

The Director  
Elementary & Secondary Education Department  
Khyber Pakhtunkhwa, Peshawar

Aziz Ullah Khan President  
President  
All Primary Teacher's Association, KP

Subject: GUIDANCE REGARDING DELETION OF RULE 7(S) IN THE KHYBER  
PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT, PROMOTION  
AND TRANSFER) RULES, 1989.

I am directed to refer to the subject noted above and to enclose herewith a letter of  
Establishment Department letter No. SO (Policy)E&AD/1-3/2020 dated 06 June, 2023 and to state  
that the subject meeting is to be held on 06 July, 2023 at 11:00 AM in this department under the  
Chairmanship of Additional Secretary (Estab) E&SE Department in his office.

2. You are, therefore, requested to depute a representative of your respective  
Department to attend the meeting on a date, time & venue as mentioned above, please.

Encl: AA

(MUHAMMAD ISHAQ)  
SECTION OFFICER (PRIMARY MALE)

Copy forwarded to the:

1. PS to Secretary, E&SE Department Khyber Pakhtunkhwa.

SECTION OFFICER (PRIMARY MALE)

ATTESTED

MINUTES OF THE MEETING REGARDING APPLICATION SUBMITTED BY MR. AZIZ ULLAH PROVINCIAL PRESIDENT ALL PRIMARY TEACHERS ASSOCIATION KHYBER PAKHTUNKHWA REGARDING DELETION OF RULE 7(S) IN THE CIVIL SERVANT (APPOINTMENT, PROMOTION & TRANSFER RULES 1989).

Annexure  
①


A meeting regarding the subject matter was held on 06-07-2023 at 11:00 AM under the Chairmanship of Additional Secretary Establishment in his office, The following attended the meeting.


SN	NAME	DESIGNATION
1	Mr. Fazal Wahid	Deputy Director Establishment of Directorate Elementary & Secondary Education Department
2	Mr. Aziz Ullah	Provincial President All Primary Teachers Association Khyber Pakhtunkhwa
3	Mr. Razaqal Ullah	General Secretary APTA Peshawar
4	Muhammad (shoa)	Section Officer (Primary) E&SE Department Civil Secretariat Khyber Pakhtunkhwa Peshawar

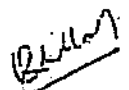
2. The meeting started with recitation from The Holy Quran. The chair welcomed the participants. The Deputy Director (Establishment) of Directorate of Elementary & Secondary Education briefed the forum regarding agenda item in detail.

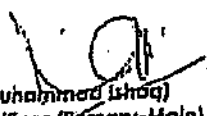
3. After threadbare discussion it was decided that Directorate of Elementary & Secondary Education Department may examine the case properly and submit a self-contained/consolidated case for onward submission to Establishment Department for further necessary action.

The meeting ended with a vote of thanks from the Chair.

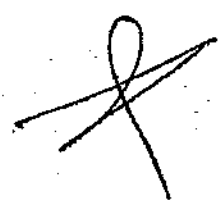
  
(Mr. Fazal Wahid)  
Deputy Director-I  
E&SE Department


  
(Mr. Aziz Ullah)  
Provincial President  
All Primary Teachers Association  
Khyber Pakhtunkhwa

  
(Mr. Razaqal Ullah)  
General Secretary APTA  
Peshawar

  
(Muhammad (shoa))  
Section Officer (Primary-Male)  
E&SE Department

(Abdullah)  
Additional Secretary (Establishment)  
E&SE Department



  
ATTEST



- B/C -

- 23 -

**MINUTES OF THE MEETING REGARDING APPLICATION SUBMITTED BY MR AZIZ ULLAH PROVINCIAL PRESIDENT ALL PRIMARY TEACHERS ASSOCIATION KHYBER PAKHTUNKHWA REGARDING DELETION OF RULE 7(S) IN THE CIVIL SERVANT (APPOINTMENT, PROMOTION & TRANSFER RULES 1989).**

A meeting regarding the subject matter was held on 06-07-2023 at 11:00 AM under the Chairmanship of Additional Secretary Establishment in his office. The following attended the meeting

S/	NAME/	DESIGNATION
1.	Mr. Fazal Wahid	Deputy Director Establishment of Directorate Elementary & Secondary Education Department
2.	Mr. Aziz Ullah	Provincial President All Primary Teachers Association: Khyber Pakhtunkhwa
3.	Mr. Razaqat Ullah	General Secretary APTA Peshawar
4.	Muhammad Ishaq	Section Officer (Primary) E&SE Department Civil Secretariat Khyber Pakhtunkhwa Peshawar

2. The meeting started with recitation from The Holy Quran. The chair welcomed the participants. The Deputy Director (Establishment) of Directorate of Elementary & Secondary Education briefed the forum regarding agenda item in detail.

3. After threadbare discussion it was decided that Directorate of Elementary & Secondary Education Department may examine the case properly and submit a self-contained/consolidated case for onward submission to Establishment Department for further necessary action.

The meeting ended with a vote of thanks from the Chair.

(Mr. Fazal Wahid)  
Deputy Director-1  
E&SE Department

\_\_\_\_\_

Provincial President  
All Primary Teachers Association  
Khyber Pakhtunkhwa

\_\_\_\_\_

(Mr. Razaqat Ullah)  
General Secretary APTA  
Peshawar

\_\_\_\_\_

(Muhammad Ishaq)  
Section Officer (Primary-Male)  
E&SE Department

\_\_\_\_\_

(Abdullah)

Additional Secretary (Establishment)

ATTESTED



-24-

ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
CIVIL SECRETARIAT PESHAWAR  
(Phone No.091-8223587)

No. SO(Primary-M)E&SED/2-2/Appointment-Rule /2023  
Peshawar Dated 23<sup>rd</sup> August, 2023

Annexure  
E

The Secretary to Govt. of Khyber Pakhtunkhwa,  
Establishment & Administration Department,  
Peshawar

**SUBJECT: - GUIDANCE REGARDING DELETION OF RULE 7(5) IN THE CIVIL  
SERVANT (APPOINTMENT, PROMOTION & TRANSFER RULES  
1989).**

Dear Sir,

I am directed to refer to your letter No. SO(Policy)/ E&AD/ 1-3/2020 dated 05<sup>th</sup> June 2023 and to state that after deletion of rule 7(5) Khyber Pakhtunkhwa Civil Servant (Appointment, Promotion & Transfer Rules 1989) it has been intimated that those officers/ officials who do not comply with promotion order of the competent authority or try to evade promotion through different means shall be proceed under Khyber Pakhtunkhwa Civil Servant (Efficiency & Discipline) Rules, 2011.

2. In this connection it is submitted that in some cases lady teacher of primary level who avail such promotions have to face serious inconvenience while they have to perform duties in the remotest station with no residential or transport facility. Most of them are married with kids and elder father of mother-in-law who need care. In such cases, there are negative effects on service delivery.

3. In view of the above, the said amendment may be reconsidered to the extent of lady teacher in primary schools.


  
(MUHAMMAD ISMAIL)  
SECTION OFFICER (PRIMARY MALE)

Copy forwarded to the:

1. Director E&SE Khyber Pakhtunkhwa.
2. PS to Secretary, E&SE Department Khyber Pakhtunkhwa.

  
SECTION OFFICER (PRIMARY MALE)  
28/8/23

Scanned with ComScanner

  
ATTESTED



No. 8145 / F.No. 31/SST/UG/General Cases Dated 21-7-2023  
Phone: 091-9223344 Email: establishment1@pk.gov.pk

To  
The Section Officer (Primary-Mule),  
Elementary & Secondary Education Department,  
Khyber Pakhtunkhwa Peshawar.

Subject: MINUTES OF THE MEETING  
Dear Sir,

I am directed to refer to the letter No.SO(Primary-M)E&SED/3-1/  
G.Misc/Minutes of the Meeting/PST/2023 dated 10-07-2023 on the subject cited above and to  
present brief history about the background of the case as under:

- That Government of Khyber Pakhtunkhwa Establishment Department (Regulation Wing) dated Rule 7(5) in the Civil Servants (Appointment, promotion & Transfer Rules 1989) vide notification No. No. SOR-VI (E&AD)/1-3/2020 dated 06-08-2020.
  - That this office sought guidance from your good office in the following words vide letter No.6987 dated 06-02-2023.
    - Now it is obligatory upon the civil servant to accept Promotion in every condition.
    - It is the prerogative of the civil servant to either accept or turn down the offer of promotion.
  - That your good office forwarded the same to the quarter concerned vide letter No.SO (Primary-M) E&SED/3-1/Appointment/2023 for necessary guidance.
  - That the Government of Khyber Pakhtunkhwa Establishment Department (Regulation Wing) vide letter No.SO (Policy) E&AD/1-3/2020 dated 6-06-2023 categorically stated that there exists no provision to decline or forgo promotion. It is obligatory upon every civil servant to accept promotion under every condition.
  - The same was accepted by this office from your good office vide letter No.SO (Primary-M) E&SED/3-1/Appointment/2023 dated 12-06-2023.
  - That, in the light of the minutes of meeting dated 6-07-2023 held under the Chairmanship of Hon. Additional Secretary Establishment at his office this office has been asked for submission of consolidated case.
- In view of the above, this office is of considered opinion that the deletion of Rules 7(5) have affected negatively a huge numbers of Female Teachers. Thus it is proposed that Teachers below SP-16 may be exempted of implications of the amendment in the rules (b) provided they submit their written refusal prior to conduction of the meeting of Departmental Promotion Committee.

The case is submitted for perusal and necessary actions please.

*(Signature)*  
Assistant Director (Estab M-1)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa

Encls: No. \_\_\_\_\_  
Copy of the above is to:-  
1. PA to Director Local Directorate.  
2. Master Copy.

Assistant Director (Estab M-1)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa

*(Signature)*  
ATTES

- B/c -

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION, KPK

PESHAWAR,  
(21-7-2023)

To:

Section Officer (Primary-Male)  
Elementary & Secondary Education Department  
KPK, Peshawar.

Subject: Minutes of Meeting

Dear Sir,

I am directed to refer to letter No. (SO Primary-M) E&SED/S-1/G/M/11/ Minutes of meeting 28/7/2023 dated 20-7-2023 on subject cited above and to present brief history, about background of case as under:

- That Government of KP Establishment department (Regulation Wing) deleted rule 7(S) in Civil Servants (Appointment, promotion, Transfer Rule 1997) vide notification No. No. SOP-VI (E&AD) 1-3/2020 dated 06-08-2020.
- That this office sought guidance from your good office in the following words vide letter No. 6987 dated 06-07-2023
  - (i) Now it is obligatory upon civil servant to accept promotion.
  - (ii) It is prerogative of civil servant to either accept/turn down the offer of promotion.
- That your good office forwarded the same to quarters concerned vide letter No. SO (Primary-M) E&SED/2-2/Appointment/2023 for necessary guidance.
- That the government of KP-ED (Regulation Wing) vide letter No. SO (Policy) E&AD/1-3/2020 dated 6-06-2023 categorically stated that there exists no provision to decline /forgo promotion. It is obligatory upon every civil servant to accept promotion under every condition.
- That in light of the minutes of the meeting dated 6-07-2023 held under the Chairmanship of Hon. Additional Secretary Establishment at his office. This office has been asked for submission of consolidated case.

In view of the above, this office is of considered opinions that the deletion of Rules 7(S) have affected negatively a huge members of Female teachers.

The case is submitted for perusal and necessary actions please.

- Copy of the above to;
1. PA to Director Local Directorate
  2. Master Copy

Assistant Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa.

ATTESTED

-27-

-B/c-

-2-

No. So (Primary - M) E&SE/8-A/  
Appointment - Rule/2023  
Peshawar Dated 23rd August, 2023.

To

The Secretary to Government of Khyber Pakhtunkhwa,  
Establishment and Administration Department,  
Peshawar.

SUBJECT: Guidance regarding deletion of Rule 7(S) in the  
Civil Servant (Appointment, Promotion & Transfer Rules  
1989).

Dear Sir,

I am directed to refer to your letter No. So (Primary) (Policy) /EE/AD  
/1-3/2020 dated 3<sup>rd</sup> June 2020 and to state that after  
deletion of Rule 7(S) (Khyber Pakhtunkhwa Civil Servant (Appointment,  
Promotion and Transfer Rules 1989) it has been intimated that  
those officers/officials who do not comply with promotion order  
of the competent authority or try to evade promotion through  
different means shall be proceed under Khyber Pakhtunkhwa  
Civil Servant (Efficiency and Discipline) Rule 2011.

In this connection it is submitted that in some cases lady  
teacher of primary level who avail such promotion have to  
face serious inconvenience while they have to perform duties  
in the remotest stations with no residential/transport facilities.  
Most of them are married with kids and elder father of  
Mother-in-law who need care. In such cases there are negative  
effects on service delivery.  
In view of above, the said amendment may be reconsidered to  
the extent of lady teacher in primary schools.

Copy forwarded to;

1. Director E&SE Khyber Pakhtunkhwa.
2. PS to Secretary, E&SE Department Khyber Pakhtunkhwa.

(Muhammad Ishaq)  
Section Officer (Primary  
Male)

ATTESTED

Annexure - F



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT  
No. SO(Policy)E&AD/1-3/2020  
Dated Peshawar the September 07, 2023

ATTACHED

-28-

To  
The Secretary to Government of Khyber Pakhtunkhwa,  
Elementary & Secondary Education Department.

Subject: - GUIDANCE REGARDING DELETION OF RULE 7(5) IN THE  
KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT,  
PROMOTION AND TRANSFER) RULES, 1989.

Dear Sir,  
I am directed to refer to your letter No. SO(Primary-M)/E&SED/2-  
2/Appointment-Rule/2023 dated 23.08.2023 on the subject noted above and to state that  
necessary guidance has already been rendered to your good office vide this department letter of  
even No. dated 06.06.2023 (copy enclosed).

Yours faithfully,

Section Officer (Policy)

Encl. Of even No & date

Copy forwarded to the:-

1. PS to Special Secretary (Reg), Establishment Department.
2. PA to Additional Secretary (Reg-II), Establishment Department.
3. PS to Deputy Secretary (Policy), Establishment Department.

SO/142-2023 AZIZULLAH VS GOVT OF PK

- 29 -

- B/c -

GOVERNMENT OF KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT  
No. SO(Policy)E&AD/1-3/2020  
Dated Peshawar the September 07, 2023

To

The Secretary to Government of Khyber Pakhtunkhwa,  
Elementary & Secondary Education Department

Subject: - GUIDANCE REGARDING DELETION OF RULE 7(5) IN THE  
KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT,  
PROMOTION AND TRANSFER) RULES, 1989.

Dear Sir,

I am directed to refer to your letter No. SO(Primary-M)/E&SED/2- Z/Appointment-  
Rule/2023 dated 23.08.2023 on the subject noted above and to state that necessary  
guidance has already been tendered to your good office vide this department letter of even  
No. dated 06.06.2023 (copy enclosed).

Yours faithfully,

Section Officer (Policy)

Encls. Of even No & date

Copy forwarded to the:-

1. PS to Special Secretary (Reg), Establishment Department.
2. PA to Additional Secretary (Reg-II), Establishment Department.
3. PS to Deputy Secretary (Policy), Establishment Department.

Section near (Policy)

ATTE

- 30 -  
Annexure - G

To,

- 1) Secretary to Government of Khyber Pakhtunkhwa, Establishment Department, Civil Secretariat, Peshawar
- 2) Secretary to Government of Khyber Pakhtunkhwa, Elementary and Secondary Education Department, Civil Secretariat, Peshawar
- 3) Director Elementary and Secondary Education Department

**Subject: REPRESENTATION AGAINST THE IMPUGNED NOTIFICATION BEARING NO.SO(POLICY)E&AD/1-312020, DATED 06/08/2020, COMMUNICATED TO SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA, ELEMENTARY & SECONDARY EDUCATION DEPARTMENT VIDE LETTER D06/06/2023, WHEREIN IT WAS STATED THAT SUB RULE 5 OF RULE 7 OF KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT, PROMOTION AND TRANSFER) RULES, 1989 STANDS DELETED**

Sir/ Madam:-

Your Honorable authority promulgated Notification No. SO (Policy) E&AD/1-3/2020, dated 06/08/2020, communicated to Elementary & Secondary Education vide letter dated 06/06/23 wherein it has been made mandatory to the employees to avail the promotion, otherwise, disciplinary action shall be taken against the employees. That, as per notification No. SO (Policy) /E&AD/1- 3/2020 dated 06/08/2020, the right of foregoing of promotion was withdrawn and the Government of Khyber Pakhtunkhwa Establishment Department (Regulation Wing) deleted Rule 7(5) in the Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 vide notification no SOR-VI (E & AD)/1-2/2020 dated 06-08-2020. That the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar asked for guidance regarding deletion of Rule 7(5) in Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 in respect of which the Establishment Department vide its letter No. SO.(Policy) E&AD/1- 3/2020 dated Peshawar the June 06th, 2023 directed the Directorate of Elementary & Secondary Education that Rule 7(5) in the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 has been deleted vide notification dated 06-08-2020 and therefore, no provision exists to decline or forgo promotion and it is obligatory upon every civil servant to accept promotion under every condition. That Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa also wrote a letter to the office of Establishment & Administrative Department vide No SO(Primary-M) E&SED/2-2/Appointment Rule/2023 dated 23-08-2023 to reconsider the amendment made in Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 as it had negatively affected a large number of teachers and especially female teachers. In the meanwhile, the department vide its letter dated 07th of September 2023 directed the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa that necessary guidance has already been provided to the department and therefore no provision exists to decline or forgo promotion and those teachers who do not comply with the promotion order of the competent authority or try to evade promotion through different means shall be proceeded under the Khyber Pakhtunkhwa Civil Servant (Efficiency & Discipline) Rules, 2011.

**It is, therefore, humbly prayed that on the acceptance of the instant representation; the Notification bearing No. SO (POLICY) E&D/1-3 1-2020 DATED 06/08/2020, communicated to vide letter dated 06/06/2023, may please be declared and ordered to be struck down being Void, Ultra vires to the Constitution of Pakistan and against the fundamental principles of natural justice.**

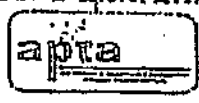
Dated 06/03/2024

ATTEST

Saeed-Ul-Haq  
S/O Muhammad  
Shah R.H.T.



Aziz Ullah Khan  
President  
0333-8312648  
azizullah1973@gmail.com  
at nainkpt



APTA House  
Govt. Primary School No.1,  
Dulbahar Peshawar City.

آل پرائمری ٹیچرز ایسوسی ایشن (اپٹا) خیبر پختونخوا  
Annexure - A

مہاب: میگزری بلڈنگ، میگزری ایجنسی خیبر پختونخوا  
مہاب: آل پرائمری ٹیچرز ایسوسی ایشن خیبر پختونخوا  
خیاب نال

گزارش ہے کہ پرموشن پر اداسے میں اورے ہوا کہ سرکاری ملازم کی تعیناتی ہوتی ہے پرموشن کا ایک قانون اور اگر چاہا کہ جو ملازم ایک اگر کسی  
مہربانی سے ایک اور پرموشن میں تو وہ پھر آئے، پاد سال تک پرموشن میں لے سکتے تھے مطلب پاد سال تک پرموشن میں آسکتے تھے اور پرموشن میں  
پہر اس قانون میں ترمیمی دہائی کی پاد سال وال بات قسم کو دی گئی کہ اگر ایک ملازم ایک سال پرموشن نہ لیں تو دوسرے سال لے سکتے ہے  
لیکن اب ایک وقت پہلے ایک اور نوٹیفکیشن ہوا ہے  
اس کے مطابق اب ہر ملازم پرموشن ضرور لیں گے اگر نہیں لیں گے 7 اس کے خلاف ای سی او کے مطابق کارروائی کرنے کا کہا گیا ہے  
اسلئے یہ آخری نوٹیفکیشن جاری اتالی جدول کی مکمل خلاف ورزی ہے صوبے کا دورہ اتالی اور پہلی ملازمتوں میں خاص کر خواتین اساتذہ کو اجازت ملازمت کا  
ممانعہ کرنا چاہئے گا  
لیکن عام حالات میں بھی فوری پرموشن اور دورہ اتالی بھیجا گیا اتالی جدول کی خلاف ورزی ہے کہ ایک خیبر پختونخوا میں پرموشن سے فارغ اتالی و شہین  
بھی ہوتے ہیں ایسے حالات میں یہ یا نوٹیفکیشن جو EGSB کی کارروائی کے تحت جاری کیا گیا ہے جو بدینے اور بنیادی اتالی جدول کی خلاف ورزی  
ہم اس کے خلاف قانونی کارروائی کا حق بھی محفوظ رکھتے ہیں  
لہذا ہم آپ سے درخواست کرتے ہیں کہ نوٹیفکیشن کو واپس لیا جائے یا اس میں ترمیم کر کے پرائمری اساتذہ کو (National) دیا جائے اور ان کو  
رہروئی پرموشن لینے کی ہمت لیا جائے ان کو سرکاری سے لینے دیا جائے  
اور پرموشن لینے کی صورت میں پاد سال ادا کیا جائے لیکن یہ رہروئی نہ کی جائے  
اس سلسلے میں آپ جلد ای جادو نام (DRO) ای ای ای اور ایک خصوصی مراسلہ جاری کیا جائے تاکہ اساتذہ میں پمیل / لیسٹیل پرائمری اساتذہ کو دینی  
البت اور توجہ تک سے پہنچا جائے  
کیونکہ نوٹیفکیشن جاری ہونے ہی پرائمری اساتذہ کو اپنی نوہ پر توجہ کرنے کا سلسلہ شروع ہو چکا ہے  
لہذا ہم یہ دینی دیکھتے ہیں کہ آپ صاحبان فوری ایکشن لیں صوبہ ہر کے پرائمری اساتذہ خصوصاً لیسٹیل پرائمری اساتذہ کو اس دینی البت سے نجات دلائیں گے

شکریہ

عزیز اللہ خان صوبائی صدر  
آل پرائمری ٹیچرز ایسوسی ایشن خیبر پختونخوا  
08/11/23

ATTEST

07.05.2024



1. Learned counsel for the appellant present.
2. Let a pre-admission notice be issued to the respondents through TCS for submission of reply/comments. Appellant is directed to deposit TCS expenses within three days. To come up for reply/comments as well as preliminary hearing on 10.06.2024 before S.B. P.D given to learned counsel for the appellant.
03. Alongwith the service appeal there is an application for suspension of Notification dated 06.06.2023 and letter dated 23.08.2023 till the final disposal of main service appeal. In the meanwhile, no adverse action shall be taken against the appellant till next date of hearing.

Certified to be true copy (Muhammad Akbar Khan)  
Member (I)

*[Handwritten signature]*  
13/5/24

Date of Presentation of Application 10-5-24  
 Number of 5  
 Copies 5  
 Origin 5  
 Total 5  
 Name of 13-5-24  
 Date of 12-5-24  
 Date of release of copy 12-5-24

*[Handwritten signature]*

ATTES

# VAKALAT NAMA

## BEFORE THE SERVICE TRIBUNAL PESHAWAR

*Saeed ul Haq*

Appellant

Versus

Government of KP & others

Respondents

I (the Appellant)

do hereby appoint and retain

MUHAMMAD MUAZZAM BUTT ASC, MUHAMMAD ADEEL BUTT AHC

BASSAM AHMAD SIDDIQUI AHC

&

ASSOCIATES OF MUAZZAM LAW FIRM

to act and appear for me in the above Suit and on my behalf to conduct and prosecute (or defend) the same and all proceedings that may be taken in respect of any petition connected with the same or any decree or order passed therein and Applications for review to file and obtain return of documents, and to represent me/us and to take all necessary steps on my/our behalf in the above matter.

I agree to ratify all acts done by the aforesaid Advocate in pursuance of this Authority.

*Saeed ul Haq*

APPELLANT

ACCEPTED

*[Signature]*  
MUHAMMAD MUAZZAM BUTT  
Advocate Supreme Court

*[Signature]*  
MUHAMMAD ADEEL BUTT  
Advocate High Court

*[Signature]*  
BASSAM AHMAD SIDDIQUI  
Advocate High Court

*[Signature]*  
ATTEST