


# FORM OF ORDER SHEET

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

Appeal No. 1847/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	09/10/2024	<p>The appeal presented today by Mr. Muhammad Muazzam Butt Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 14.10.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHUWA

~~A~~ NO = 1847 / 24

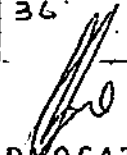
MUHAMMAD AYAZ

V/S

Government of KP & others

INDEX

S#	DESCRIPTION OF THE DOCUMENTS	ANNEX	PAGES
1.	Appeal and Verification	.	1-4
2.	Application for suspension	.	5
3.	Copy of Monthly Salary account	A.	6 - 19
4.	Copy of notification No. SD (Policy) EV AD/1-3/2020 dated 06/08/2020	B.	20 - 21
5.	Copy of Impugned Letter dated June 06th, 2023	C.	22 - 24
6.	Copy of Minutes of Meeting dated 06-07-2023	D.	25 - 28
7.	Copy of Letter dated 23-08-2023	E.	29 - 30
8.	Copy of Impugned letter dated 07-09-2023	F.	31 - 32
9.	Copy of Representation against the said notification and representation made by APTA President	G & H	33 34 - 35
10.	Wakalat Nama		36

  
ADVOCATE  
M. Muazzam Butt

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHUWA**

In Ref to

Service Appeal No 1847 /2024

Muhammad Ayaz Son of Ali Haider, SPST (BPS-14)  
GPS Mardan, Tehsil & District Mardan

.....Appellant

**V E R S U S**

- 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, Civil Secretariat Near MPA Hostel, Peshawar

.....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 Senior Primary School Teacher.  
Copy of Appointment letter is annexed as **Annexure A**

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) /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. Copy of Impugned 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

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 APFA 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 petitioners filed this Hence, the instant service appeal is filed on the following grounds:-

**GROUNDS:-**

- 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 forgo 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, (the appellant) 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

*Ayaz*  
 Appellant

Through

*Muhammad Muazzam Butt*  
 Advocate Supreme Court

*Muhammad Adeel Butt*  
 Advocate High Court

*Bassam Ali*  
 Bassam Ali 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

**MUHAMMAD AYAZ  
VERSUS**

Secretary to Government of Khyber Pakhtunkhwa, &amp; 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 this Honorable Court.

*Ayaz*  
Deponent

Through

*Ayaz*  
Appellant

*Abhe*  
Muhammad Muazzam Butt  
Advocate Supreme Court

*Adel Butt*  
Muhammad Adeel Butt  
Advocate High Court

Dist. Govt: KP-Provincial  
District Accounts Office Mardan  
Monthly Salary Statement (August-2024)



Personal Information of Mr MUHAMMAD AYAZ d/w/s of ALI HAIDER

Personnel Number: 00153681 CNIC: 1610222549559 NTN:  
Date of Birth: 10.02.1981 Entry into Govt. Service: 26.10.2004 Length of Service: 19 Years 10 Months 007 Days

Employment Category: Active Temporary

Designation: SENIOR PRIMARY SCHOOL TEA 80003432-DISTRICT GOVERNMENT KHYBE

DDO Code: MR6156-DY.DISTRICT EDUCATION OFFICER (M) M

Payroll Section: 003

GPF Section: 001

Cash Center: 3

GPF A/C No: 153681

GPF Interest applied

GPF Balance:

141,992.00 (provisional)

Vendor Number:

Pay and Allowances:

Pay scale: BPS For - 2022

Pay Scale Type: Civil BPS: 14

Pay Stage: 15

Wage type	Amount	Wage type	Amount
0001 Basic Pay	48,630.00	1001 House Rent Allowance 45%	3,321.00
1210 Convey Allowance 2005	2,856.00	1300 Medical Allowance	1,500.00
2148 15% Adhoc Relief All-2013	550.00	2199 Adhoc Relief Allow @10%	373.00
2316 Teaching Allowance 2021	3,036.00	2341 Dispr. Red All 15% 2022KP	4,558.00
2347 Adhoc Rel Al 15% 22(PS17)	4,558.00	2378 Adhoc Relief All 2023 35%	16,411.00
2393 Adhoc Relief All 2024 25%	12,157.00		0.00

Deductions - General

Wage type	Amount	Wage type	Amount
3014 GPF Subscription	-3,900.00	3501 Benevolent Fund	-1,200.00
3609 Income Tax	-1,790.00	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 Insta	446,000.00	-22,500.00	423,500.00

Deductions - Income Tax

Payable: 29,143.70 Recovered till AUG-2024: 3,962.00 Exempted: 7285.60 Recoverable: 17,896.10

Gross Pay (Rs.): 97,950.00 Deductions: (Rs.): -30,125.00 Net Pay: (Rs.): 67,825.00

Payee Name: MUHAMMAD AYAZ

Account Number: 4320135487

Bank Details: NATIONAL BANK OF PAKISTAN, 230578 KHAWAJ GUNJ KHAWAJ GUNJ,

Leaves: Opening Balance: Availed: Earned: Balance:

Permanent Address: TOHEED ABAD MARDAN

City: MARDAN

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email: mayazteacher@gmail.com

**ATTESTED**



**OFFICE OF THE EXECUTIVE DISTRICT OFFICER (Schools & Higher Education) MARDAN.**

**APPOINTMENT ORDER**

Consequent upon the advertisement published in the Daily Mashriq Postwar dated 07-02-2004 and resulted interview held on 25-02-2004 by the District recruitment/selection Committee. The District Coordination officer Mardan being Competent Authority is pleased to appoint/approve the following PST (Male) on contract basis for three years only in BPS-07 (Rs 2220-5820 P.M) plus usual allowances as admissible to them under the rules against the vacant PST Post in the school noted against each with effect from the date of their taking over charge in the interest of the service subject to the following existence terms and conditions:

**UNION COUNCIL WISE**

Sr No	Sl. No	Name	Father's Name	Union Council	House No	Address	Grade	Name of school where posted
<b>UC Aio</b>								
	337	Imdad Ullah Shah	Sauwar Shah	Aio	33, 24	Aio	GPS	Papoi Dagi Khot
	374	Abdusamad Anwar	Abdusamad Hakeem	Aio	31, 33	Uar Cham Aio	GPS	Papoi Dagi Khot
	1113	Fazal Rehman	Fazal Marjan	Aio	54, 06	Aio	GPS	Papoi
<b>UC Dabani</b>								
	623	Imdad Ullah Shah	Sauwar Shah	Dabani	53, 54	Khudai Noor Khat	GPS	Dabani
	627	Muhammad Ali	Abdul Samad	Dabani	53, 55	Chalbarani	GPS	Yahya Jadedo
	637	Muhammad Ali	Abdul Samad	Dabani	53, 55	Chalbarani	GPS	Khudai Noor Khat
	838	Imdad Ullah Shah	Imdad Ullah Shah	Dabani	53, 55	Chalbarani	GPS	Khudai Noor Khat
	1238	Abdusamad Anwar	Abdusamad Hakeem	Dabani	52, 72	Chalbarani	GPS	Shankar (Dabani)
	1273	Abdul Khan	Hacha Khan	Dabani	52, 88	Chalbarani	GPS	Dabani
	303	Naseer Khan	Shahid Khan	Dabani	51, 74	Chalbarani	GPS	Naseer Khat
	1804	Imdad Ullah Shah	Imdad Ullah Shah	Dabani	51, 92	Chalbarani	GPS	Naseer Khat
	1493	Imdad Ullah Shah	Imdad Ullah Shah	Dabani	51, 26	Chalbarani	GPS	Naseer Khat
	1111	Imdad Ullah Shah	Imdad Ullah Shah	Dabani	31, 03	Chalbarani	GPS	Naseer Khat
	485	Imdad Ullah Shah	Imdad Ullah Shah	Dabani	51, 74	Chalbarani	GPS	Shaga No 1
	429	Imdad Ullah Shah	Imdad Ullah Shah	Dabani	51, 11	Chalbarani	GPS	Shankar Korona
	1070	Fazal Rehman	Fazal Rehman	Dabani	49, 89	Chalbarani	GPS	Shaga No 2
	2177	Fazal Rehman	Fazal Rehman	Dabani	48, 73	Chalbarani	GPS	Shankar
	1239	Imdad Ullah Shah	Imdad Ullah Shah	Dabani	48, 73	Chalbarani	GPS	Shankar
	622	Imdad Ullah Shah	Imdad Ullah Shah	Dabani	48, 73	Chalbarani	GPS	Khudai Noor Khat
	1235	Imdad Ullah Shah	Imdad Ullah Shah	Dabani	48, 03	Chalbarani	GPS	Khudai Noor Khat
	624	Imdad Ullah Shah	Imdad Ullah Shah	Dabani	47, 13	Chalbarani	GPS	Khudai Noor Khat
	1728	Imdad Ullah Shah	Imdad Ullah Shah	Dabani	47, 37	Chalbarani	GPS	Khudai Noor Khat

**ATTESTED**

			Usulutani	46.30	GOPU Shanar Al-Jabal Shanar	GPS	Jaur Akbar Ka		
	581	Said Allah Khan	Zay Allah Khan	Usulutani	46.29		GPS	Jaur Akbar Ka	
	1219	Zay Allah Khan	Zay Allah Khan	Usulutani	46.31		GPS	Shanar Korona (Ushara)	
	1805	Abdul Almalik	Jal Jal	Usulutani	46.31		GPS	Shanar Korona (Ushara)	
	1110	Shanar (Jaur)	Shanar	Usulutani	46.31		GPS	Shanar Korona (Ushara)	
UC Babuzai								GPS	Babuzai No 2
	1132	Muhammad Khan	Muhammad Khan	Babuzai	52.73		GPS	Mangan Babuzai	
	1116	Said Almalik	Muhammad Khan	Babuzai	51.13		GPS		
UC Daghilala									
	989	Muhammad Khan	Muhammad Khan	Daghilala	53.75		GPS	Faqir Dan	
	1275	Muhammad Suliman	Muhammad Suliman	Daghilala	53.51		GPS	Faqir Dan	
UC Dagh-e-Haram									
	871	Shanar Hayat	Amir Hayat	Dagh-e- Haram	57.76		GPS	Tambulak	
	809	Jalil Khalid	Gulistan Habib	Dagh-e- Haram	51.13		GPS	Tambulak	
	875	Muhammad Ali	Abdul Almalik	Dagh-e- Haram	58.00		GPS	Tambulak	
UC Dagh-e-Haram									
	848	Saeed Zaman	Dagh-e- Haram	Dagh-e- Haram	51.33		GPS	Jaur Abad	
	1645	Muhammad Suliman	Muhammad Suliman	Dagh-e- Haram	51.67		GPS	Jaur Abad	
	1116	Muhammad Khan	Muhammad Khan	Dagh-e- Haram	51.47		GPS	Zubair Dhan	
	1501	Muhammad Khan	Muhammad Khan	Dagh-e- Haram	49.95		GPS	Zubair Dhan	
	1833	Abdul Almalik	Abdul Almalik	Dagh-e- Haram	47.99		GPS	Jaur Dhan	
UC Dagh-e-Haram									
	113	Muhammad Ali	Muhammad Ali	Dagh-e- Haram	53.00		GPS	Dagh-e-Haram No 2	
	1113	Muhammad Ali	Muhammad Ali	Dagh-e- Haram	57.54		GPS	Muhammad Banda	
UC Dagh-e-Haram									
	950	Muhammad Ali	Muhammad Ali	Dagh-e- Haram	53.48		GPS	Hoti	
	1493	Muhammad Ali	Muhammad Ali	Dagh-e- Haram	49.57		GPS	Dagh-e-Haram	
UC Dagh-e-Haram									
	228	Muhammad Ali	Muhammad Ali	Dagh-e- Haram	56.29		GPS	Shujawal Banda	
	591	Muhammad Ali	Muhammad Ali	Dagh-e- Haram	51.17		GPS	Dugh	
	875	Muhammad Ali	Muhammad Ali	Dagh-e- Haram	49.67		GPS	Patlow Matundari	
	229	Muhammad Ali	Muhammad Ali	Dagh-e- Haram	49.05		GPS	Surkhani	
	710	Muhammad Ali	Muhammad Ali	Dagh-e- Haram	48.34		GPS	Surkhani	
	365	Muhammad Ali	Muhammad Ali	Dagh-e- Haram	46.36		GPS	Shujawal Banda	

ATTENDED

1768	Sajid Ali	Zameer Khan	Uzair	41.21	Uzair Rustam	GPS	Deroch
1769	Wahid Khan	Muhammad Nour	Uzair	31.73	Hussain Makh	GPS	Peash
1771	Ahmad Zeh	Muhammad Khan	Uzair	31.37	Deroch Rustam	GPS	Mow Almasud
1780	Muhammad Yaqub Khan	Ihsan Khan	Uzair	30.81	GPS Rustam	GPS	Shajawal Banda
UC Chak Hali							
1769	Muhammad Amin	Haji Khan Zada	Chak Moh	54.71	Kha Kha	GPS	Pani Akhbar Khet
1768	Shahid Khan	Ali Hader	Chak Moh	51.32	Maria Kar	GPS	Tous banda
1771	Zahir Shah	Shey Muhammad	Chak Moh	50.03	Raja Khan	GPS	Tous banda
1779	Zahid Muhammad	Taj Muhammad	Chak Moh	49.60	Sajjanwar	GPS	Tous banda
1467	Fazil Amin	Syed Hussain Shah	Chak Moh	48.18	Faqir Akbar	GPS	Tous banda
1467	Sajid Ali	Muhammad Usaq	Chak Moh	46.49	Muhammad	GPS	Tous banda
1454	M. Yousaf Khan	Jamir Khan	Chak Moh	46.07	Gur Akbar Par	GPS	Tous banda
1740	Shaukat Ali	Hizwan Ullah	Chak Moh	42.25	Khan	GPS	Pani Akhbar Khet No 2
1426	Akbar Ali	Uma Khan	Chak Moh	42.25	Gur Akbar Par	GPS	Pani Akhbar Khet No 2
1426	Niaz Muhammad	Gul Muhammad	Chak Moh	42.17	Khan	GPS	GPS Tous Banda
UC Chantari							
1858	Abul Khan	Yaqub Khan	Chantari	52.73	Soni Akbar	GPS	Chantari
1859	Muhammad Ayaz	Muhammad Khan	Chantari	50.50	Chantari	GPS	Chantari
1859	Iqbal Khan	Jamir Khan	Chantari	49.10	Muhammad Akbar	GPS	Chantari
1877	Imdad Ahmad	Hameed Gul	Chantari	47.21	Muhammad	GPS	Chantari
1884	Noor Ullah	Muhammad Khan	Chantari	46.00	Muhammad Akbar	GPS	Chantari
1733	Ali Hassan	Chantari	Chantari	42.23	Chantari	GPS	Chantari
1714	MUSKIN	Amir Khan	Chantari	42.21	Chantari	GPS	Chantari
1821	Muhammad Shah	Jafar Khan	Chantari	42.00	Muhammad	GPS	Nara Khan Gulzara
1826	Syed Ullah	Amir Khan	Chantari	39.05	Muhammad	GPS	Nara Khan Gulzara
1807	Ahsan Rashid	Muhammad Khan	Chantari	38.50	Muhammad	GPS	Sugar Can Form
UC Char Gul							
1880	Muhammad Amin	Muhammad Yousaf	Char Gul	54.38	Muhammad	GPS	Char Gul
1283	Muhammad Ali	Ali Hader	Char Gul	51.45	Ali Hader	GPS	Pir Khet Sad Akbar
297	Abdul Wali Khan	Muhammad Akbar	Char Gul	53.10	Muhammad Akbar	GPS	Pir Khet Sad Akbar
1827	Muhammad	Faqir Muhammad	Char Gul	53.10	Char Gul	GPS	Pir Khet Sad Akbar
UC Daga							
1883	Ali Khan	Umam Gul	Daga	54.31	Daga	GPS	Daga

*Handwritten signature*

**ATTESTED**

77	656	M. Najmat Azeem	Shahwanab Ali	Dagaj	53.16	Dagaj	GPS	Dagaj
78	146	Anwar Ahmad	Gul Wali	Dagaj	53.01	Dagaj	GPS	Serai Korona
79	1969	Syed Muhammad	Syed Ishaq Din	Dagaj	48.15	Khan Alam Kili	GPS	Serai Korona
80	1171	Nasir Muhammad	Fateh Muhammad	Dagaj	41.53	Durban Abad	GPS	Serai Korona
81	183	Amjad Muhammad	Siraj Muhammad	Dagaj	33.63	Kashkorona Alardai	GPS	
UC Durrani-e-Kh							GPS	Mazdoor Abad
82	487	Shahab ul Din	Hasn Amir	Daman-e-Koh	55.75	Sarhau Colony	GPS	Mazdoor Abad
83	1036	Sayed Hakeem	Raham Zaid	Daman-e-Koh	55.19	Alang Colony	GPS	Mazdoor Abad
84	2242	Javed Iqbal	Wajida Khan	Daman-e-Koh	54.39	Painda Khan Kari T. Bhaia	GPS	Mazdoor Abad
85	165	Imiaz	Khan Pur	Daman-e-Koh	54.14	Mazdoor Abad	GPS	Mazdoor Abad
86	264	Akbar Ali	Mir Akbar	Daman-e-Koh	53.89	Mazdoor Abad	GPS	Mazdoor Abad
87	217	Nisar Khan	Shamroz Khan	Daman-e-Koh	53.36	Ward No. 3 Talha	GPS	Tekin Ohai No. 3
UC Durrani-e-Kh							GPS	Minkara Banda
88	103	Farzana Gul	Zamin Gul	Daman-e-Koh	55.50	Daman-e-Koh	GPS	Minkara Banda
89	115	Muhammad Yousaf	Muhammad Yousaf	Daman-e-Koh	55.32	Daman-e-Koh	GPS	Minkara Banda
UC Durrani-e-Kh							GPS	Dalasa
90	133	Nisar Ahmad	Fazil Ahmad	Fathma	55.38	Dalasa	GPS	Dalasa
91	1576	Muhammad Jaseer	AL Akhbar Khalid	Fathma	55.33	Fathma Alardai	GPS	Dalasa
92	758	Muhammad Khalid	Muhammad Karim	Fathma	54.28	Qazi Abad	GPS	Dalasa
93	316	Anwar Khan	Umar Khan	Fathma	54.05	Dalasa	GPS	Maina Banda
94	1999	Sherkat Ali	Lal Husein	Fathma	53.43	Zamra	GPS	Qazi Abad I
95	1940	Hazra Khan	Ansh Khan	Fathma	53.39	Daman-e-Koh	GPS	Qazi Abad
96	1981	Ahmad Khan	Zamra Gul	Fathma	50.50	Fathma Alardai	GPS	Qazi Abad
97	635	Fayyaz Uddin	Qazi Ghulamabbas	Fathma	50.79	Qazi Abad	GPS	Qazi Abad
98	1597	Abdul Qayyum	Mustafa Kamal	Fathma	48.67	Fathma Alardai	GPS	Qazi Abad
99	1102	Muhammad Ibrahim	Hafiz Khan	Fathma	48.61	Fathma	GPS	Fathma
100	222	Muhammad Ibrahim	Muhammad Shah	Fathma	48.11	Muhammad Gadhur	GPS	Spin Junat
101	226	Muhammad Khalid	Muhammad Fasih Uddin	Fathma	48.11	Fathma	GPS	Spin Junat
102	2226	Khalid Khan	Fasih Uddin	Fathma	47.98	Qazi Abad	GPS	Spin Junat
103	1625	Wakil Ahmad	Gulzar Din	Fathma	47.37	Hafiz Fathma	GPS	Junna
104	221	Muhammad Hussain	Muhammad Shah	Fathma	47.66	Muhammad Gadhur	GPS	Junna
105	494	Qasim Ali	Nazam Khan	Fathma	47.26	Fathma	GPS	Junna
106	1831	Sher Muhammad	Jafar Din	Fathma	47.04	Jafar Gadhur	GPS	Qazi Abad

Scanned with CamScanner  
**ATTESTED**

102	1030	Khalim K. M. Rahman	Mohammad Halim	Muhajir	0,02 Zol	16,43	Handa	GPU	Uluu Abad.
UC Oluu									
103	111	Mohammad Fakhri	Muzli Hail		0,02 Zol	31,92	Gulê Kappa	GPS	Dul Serif No.1
104	112	Mohammad Fakhri	Muzli Hail		0,02 Zol	31,76	Gulê Kappa	GPS	Dul Serif No.1
105	113	Abul Khan	Muzli Hail		0,02 Zol	31,61	Gulê Kappa	GPS	Dul Serif No.1
106	114	Abul Khan	Muzli Hail		0,02 Zol	31,01	Gulê Kappa	GPS	Dul Serif No.1
107	115	Abul Khan	Muzli Hail		0,02 Zol	30,50	Gulê Kappa	GPS	Dul Serif No.1
108	116	Huzaf Ali	Abdul Alraf		0,02 Zol	49,79	Uluu Zol	GPS	Gulshan G D.Zol.
UC Cham Rang									
109	117	Muzli Hail	Muzli Hail		0,02 Zol	33,81	Gulê Kappa	GPS	Cham Rang
110	118	Muzli Hail	Muzli Hail		0,02 Zol	31,79	Gulê Kappa	GPS	Cham Rang
111	119	Huzaf Ali	Abdul Alraf		0,02 Zol	31,00	Gulê Kappa	GPS	Cham Rang
112	120	Muzli Hail	Muzli Hail		0,02 Zol	31,00	Gulê Kappa	GPS	Cham Rang
UC Goryala									
113	121	Ashraf Ali	Muzli Hail		Goryala	33,85	Uluu Zol	GPU	Asara Dheri
114	122	Abul Khan	Muzli Hail		Goryala	33,32	Uluu Zol	GPU	Asara Dheri
115	123	Abul Khan	Muzli Hail		Goryala	33,24	Uluu Zol	GPU	Hussol
116	124	Muzli Hail	Muzli Hail		Goryala	49,31	Goryala	GPS	Sald Resan Banda
117	125	Muzli Hail	Muzli Hail		Goryala	49,05	Goryala	GPS	Goryala Khas
118	126	Muzli Hail	Muzli Hail		Goryala	37,49	Goryala	GPS	Muzli Hail
UC Ghos Dheri									
119	127	Huzaf Ali	Abdul Alraf		Ghos Dheri	34,84	Gulê Kappa	GPS	Yoko Khat
120	128	Muzli Hail	Muzli Hail		Ghos Dheri	47,22	Gulê Kappa	GPS	Yoko Khat
121	129	Muzli Hail	Muzli Hail		Ghos Dheri	46,44	Gulê Kappa	GPS	Tikodar Kal
122	130	Muzli Hail	Muzli Hail		Ghos Dheri	43,19	Wol Abad	GPS	Tikodar Kal
123	131	Muzli Hail	Muzli Hail		Ghos Dheri	42,94	Muzli Hail	GPS	Ghosh Dheri no 2
124	132	Muzli Hail	Muzli Hail		Ghos Dheri	41,85	Muzli Hail	GPS	Sokra
UC Gupar Garhi									
125	133	Muzli Hail	Muzli Hail		Gupar Garhi	33,89	Gulê Kappa	GPS	Mangano Cham
126	134	Muzli Hail	Muzli Hail		Gupar Garhi	33,37	Gulê Kappa	GPS	Mangano Cham
127	135	Muzli Hail	Muzli Hail		Gupar Garhi	31,21	Gulê Kappa	GPS	Gupar Garhi
128	136	Muzli Hail	Muzli Hail		Gupar Garhi	33,26	Gulê Kappa	GPS	Mangano Cham
129	137	Muzli Hail	Muzli Hail		Gupar Garhi	33,11	Gulê Kappa	GPS	Mangano Cham

**ATTACHED**

UC (Ujrat)								
135	1175	M. Iqbal Khan	Hussain Hashmi	Gulistan	51.75	Gulistan	GPS	Sajid Umar
UC Gulistan								
136	729	M. Zahir	Muhammad Rabani	Gulistan	50.85	Gulistan	GPS	Landmark
137	501	Muhammad Israr	Muhammad Nadeem	Gulistan	49.01	Gulistan	GPS	Landmark
138	1533	Sardar Haran	Mohd. Mubtajibillah	Gulistan	58.15	Gulistan	GPS	Landmark
139	111	Nisar	Sherya	Gulistan	51.11	Gulistan	GPS	Landmark
140	873	Hussain	Syahi Hussain	Gulistan	55.15	Gulistan	GPS	Gulistan
UC (Ujrat)								
141	1371	Syed Akbar	Fajr	Gulistan	53.85	Gulistan	GPS	Hussain
142	1373	Muhammad Wali	Nawal Khan	Gulistan	53.85	Gulistan	GPS	Shahid Akbar
143	2178	Muhammad Asif	Ismatullah	Gulistan	50.07	Gulistan	GPS	Maharaj (388)
144	1111	Muhammad Ibrahim	Gulistan	Gulistan	50.53	Gulistan	GPS	Anar Ujrat No 1
145	111	Muhammad Israr	Gulistan	Gulistan	49.85	Gulistan	GPS	Anar Ujrat No 2
146	450	Muhammad Zahir	Ahmed Ujrat	Gulistan	46.05	Gulistan	GPS	Murad Akbar
147	280	Muhammad Shaker	Fazir	Gulistan	45.37	Gulistan	GPS	Korah Gulistan
148	696	Fazir Akbar	Gulistan	Gulistan	44.15	Gulistan	GPS	Shahid Akbar
149	652	Abdul Hadi	Abdul Hadi	Gulistan	43.50	Gulistan	GPS	Shahid Akbar
150	1113	Muhammad	Nisar	Gulistan	43.05	Gulistan	GPS	Hayat Gul Korona (Gulistan)
151	1741	Muhammad Ali	Rasool Khan	Gulistan	42.75	Gulistan	GPS	Hayat Gul Korona (Gulistan)
152	1774	Hussain Akbar	Ali	Gulistan	42.25	Gulistan	GPS	Kodhan (Gulistan)
UC (Ujrat)								
153	1948	Ujrat Hussain	Amir Hussain	Gulistan	55.02	Gulistan	GPS	Dad Muhammad Kafi
154	1398	Farman Ali	Masroor	Gulistan	51.92	Gulistan	GPS	Dad Muhammad Kafi
UC Jafala								
155	1221	Qasim Khan	Atalok	Jafala	53.07	Jafala	GPS	Jafala No 1
156	1217	Muhammad Israr Khan	Nazar Gul	Jafala	55.00	Jafala	GPS	Jafala No 1
UC Jehangir Akbar								
157	853	Shahid Muhammad	Nazar Muhammad	Jehangir Akbar	52.95	Jehangir Akbar	GPS	Khan Gatha
158	604	Muhammad Raza	Khan Hashim	Jehangir Akbar	52.23	Jehangir Akbar	GPS	Wara Khat
UC Kandar								
159	1002	Fazir Muhammad	Atwar Khan	Kandar	50.15	Kandar	GPS	Kandar No 3

*Handwritten signature*

Scanned with CamScanner  
**ATTESTED**

161	2134	Payyaz Ahmad	Rawal Khan	Kandor	48.57	Qasim	GPS	Kandor No 3
162	2378	Muhammad Ali	Rawal Khan	Kandor	48.98	Chauhan Khan	GPS	Daghdhoni
163	2123	Muhammad Zaki	Zakir Ullah	Kandor	48.44	Kandor Marfan	GPS	Mangan
164	2491	Fazal Hadi	Fazal Hussain	Kandor	48.36	Shogo KA	GPS	Mangan
UC Kass Koroono								
165	1498	Khalid Usman	Qadir Ullah	Kas, Kolono	54.28	Kaskorona MON	GPS	Kass Koroono
UC Kafa Khat								
166	2124	Fakhruddin	Muhammad Aqil	Kafa Khat	56.22	Gharu Abad	GPS	Gharu Abad
167	2190	Rasheed Ahmad	Adil Shah	Kafa Khat	53.30	Tariq Abad	GPS	Narsi Banda
168	2150	Muhammad Shafiq	Zaman Khan	Kafa Khat	53.13	Gharu Abad	GPS	Kafa Khat
169	2143	Muhammad Asif	Qadir Usman	Kafa Khat	51.81	Gharu Abad	GPS	Gul Abad No.1
UC Kallang No 1								
170	216	Muhammad Ayaz Khan	Sanaullah	Kallang No 1	55.43	Kallang Mardan	GPS	Shero Dheri
171	2112	Nayab Gul	Nayab Gul	Kallang No 1	55.31	Kallang Mardan	GPS	Inzargi No.2
UC Kallang No 2								
172	2131	Khalid Muhammad	Shir Muhammad	Kallang No 2	54.19	Shero	GPS	Awal Dad Banda
173	2117	Amir Akbar	Muhammad Akbar	Kallang No 2	54.02	Shero Tangi	GPS	Awal Dad Banda
174	2138	Muhammad Zaki	Muhammad Gul	Kallang No 2	52.91	Shero	GPS	Habib Dad Banda
175	2114	Muhammad Ahmad	Shir Aziz	Kallang No 2	53.15	Shero	GPS	Habib Dad Banda
176	2117	Khalid Ghani	Fazal Hussain	Kallang No 2	50.37	Inzargi Kallang	GPS	Jan Abad
UC Kati Garhi								
177	218	Sali Muhammad	Talib Jan	Kati Garhi	55.19	Sotah Ghundal	GPS	Said Faqr Banda
178	2177	Abdul Shab	Habib Shah	Kati Garhi	55.63	Shahzai Lund Khwar	GPS	Fida Muhammad Shero
179	2106	Aman Ullah	Muhammad Afzal	Kati Garhi	55.11	Kati Garhi	GPS	Mangano Kati
UC Khazana Dheri								
180	2168	Abid Hussain	Dilwar Khan	Khazana Dheri	55.91	Fazal Kati	GPS	Muhammad Zaman Kati
181	2158	Khalid Khan	Said Kamal	Khazana Dheri	55.39	Shah Yousof	GPS	Kandor No.1
182	2248	Habib Khan	Ayoub Khan	Khazana Dheri	55.27	Khazana Dheri	GPS	Kandor No.1
183	2160	Fazal Muhammad	Wali Muhammad	Khazana Dheri	55.84	Khazana Dheri	GPS	Kandor No.1
184	2172	Muhammad Jaman	Rahman Gul	Khazana Dheri	52.81	Kowari Mardan	GPS	Kandor No.1
185	1787	Mir Anwar Shahidi	Alan Khan	Khazana Dheri	52.43	Shah Yousof	GPS	Khan Pur
186	2167	Ajmal Khan	All Rahman	Khazana Dheri	52.41	Jalal Kati	GPS	Fazal Kati
187	2155	Khalid Rahman	Amir Akbar	Khazana Dheri	51.87	Khazana Dheri	GPS	Fazal Kati

**ATTACHED**

No	Sl. No	Name	Address	Area	Value	Remarks	Category	Location
UC Kohli Harmol								
188	1216	Alimur Khan	Rahim Khan	Koti Harmol	55.41	Kinokotana	GPS	Koti Harmol No. 2
189	1057	Muhammad Rehan	Muhammad Khan	Koti Harmol	55.15	Alimur Khan	GPS	Sangaroo
190	1569	Sahib Lal	Nazir Lal	Koti Harmol	55.03	Alimur Khan	GPS	Sangaroo
191	1055	Rahim Khan	Said Afzal	Koti Harmol	55.35	Alimur Khan	GPS	Koti Harmol No. 2
UC Kot Daulat Zai								
192	584	Nour ur Rehman	Ghani ur Rehman	Koti Daulat Zai	55.50	Koti Daulat Zai	GPS	K.D. Zai No. 2
193	1141	Rayaz Ali	Muhammad Wahid	Koti Daulat Zai	55.56	Koti Daulat Zai	GPS	Uda Gram No. 1
194	1024	Muhammad Ali	Nasir Khan	Koti Daulat Zai	55.40	K.D.	GPS	Uda Gram No. 1
195	924	Sahib Lal	Muhammad Khan	Koti Daulat Zai	55.99	Ghani ur Rehman	GPS	Koti Daulat Zai No. 1
196	1563	Muhammad Akbar Khan	Muhammad Shah	Koti Daulat Zai	55.50	Koti Daulat Zai	GPS	Koti Daulat Zai No. 1
197	789	Muhammad	Muhammad	Koti Daulat Zai	55.54	Yaqub Khan	GPS	Koti Daulat Zai No. 1
198	929	Sahib Lal	Muhammad	Koti Daulat Zai	50.68	Koti Daulat Zai	GPS	Koti Daulat Zai-1
199	1410	Harun Ali	Muhammad Khan	Koti Daulat Zai	49.91	Koti Daulat Zai	GPS	Koti Daulat Zai No. 2
200	1564	Muhammad Islam	Abdul Ghafur	Koti Daulat Zai	49.11	Koti Daulat Zai	GPS	Koti Daulat Zai No. 2
201	790	Muhammad	Muhammad	Koti Daulat Zai	49.83	Yaqub Khan	GPS	Koti Daulat Zai-1
202	1362	Muhammad Khan	Ali Ghafur	Koti Daulat Zai	47.89	Koti Daulat Zai	GPS	Koti Daulat Zai-2
203	1963	Muhammad Ali	Sher Zaman	Koti Daulat Zai	46.00	K.D. Zai	GPS	Balagram No. 1
UC Kot Jungarna								
204	1822	Nazir Ali	Abdul Subhan	Koti Jungarna	53.10	Koti	GPS	Pamp Kali No. 1
205	683	Muhammad Akbar	Muhammad	Koti Jungarna	51.80	Koti	GPS	Pamp Kali No. 1
206	1376	Nazir Khan	Pale Wali	Koti Jungarna	47.70	Koti	GPS	Pamp Kali No. 1
207	519	Muhammad	Sahib Muhammad	Koti Jungarna	45.57	Kopar Sahib	GPS	Kopar Sahib
208	318	Sahib Muhammad	Sahib Muhammad	Koti Jungarna	45.07	Jungarna	GPS	Sahib Muhammad
209	161	Muhammad	Sahib Muhammad	Koti Jungarna	44.73	Nazir Khan	GPS	Sahib Muhammad
210	1544	Muhammad	Muhammad	Koti Jungarna	43.88	Jamal Gauri	GPS	Sahib Muhammad
211	1145	Lal Zai	Sherin Zai	Koti Jungarna	43.20	Koti Tahsi	GPS	Limar, Khair Banda
212	1015	Sahib Ali	Lal Zai	Koti Jungarna	42.24	Jungarna	GPS	Pamp Kali No. 2
UC Machi								
213	410	Akbar	Fazal Hahar	Machi	55.06	Machi	GPS	Machi
214	283	Waqar Zaman	Haji Hahar	Machi	54.21	Daulat Zai	GPS	Taja
215	53	Muhammad Ali	Sahib Shah	Machi	53.00	Machi	GPS	Taja

~~ATTACHED~~





Sl. No.	Roll No.	Name	Father's Name	Par No.	Par Value	Par Name	GPS	Par No. 2
101	159	Aamir	Toj Akhbar	Par No. 1	49.81	Par No. Mardan	GPS	Par No. 1
102	163	Saeed Shah	Muhammad Ishaq	Par No. 1	48.97	Par No. Mardan	GPS	Par No. 1
<b>UC Parkho Uheri</b>								
103	164	Rashid Gul	Abdul Wahid	Par No. Uheri	50.01	Muzam Khan	GPS	Tarif Akbar
104	1591	Fayaz Ahmad	Ghazan	Par No. Uheri	53.23	Par No. Uheri	GPS	Tarif Akbar
105	964	Muhammad	Fazal Hakim	Par No. Uheri	53.28	Tarif Shah	GPS	Chanchano Khan
106	1705	Muhammad Khan	Ghazan Khan	Par No. Uheri	54.95	Par No. Uheri	GPS	Chanchano Khan
107	171	Aamir Ali	Juma Khan	Par No. Uheri	54.81	Muzam Khan	GPS	Muzam Khan (II)
108	2179	Muhammad Ali	Gul Hammad	Par No. Uheri	54.69	Muzam	GPS	Muzam Khan (II)
109	804	Jehangir Khan	Habib Ali Khan	Par No. Uheri	54.48	Par No. Uheri	GPS	Muzam Khan (II)
110	1096	Iqbal Hussain	Muhammad Khan	Par No. Uheri	54.19	Par No. Uheri	GPS	Muzam Khan (II)
111	726	Aamir Ali	Muhammad	Par No. Uheri	53.97	Ghazan Uheri	GPS	Muzam Khan (II)
<b>UC Par Daba</b>								
112	509	Hussain Ullah	Muhammad Hussain	Par Daba	55.76	Chowdhary Ghaffar Akbar	GPS	Muzam Khan (II)
113	801	Fazal Akbar	Muzam Khan	Par Daba	55.72	Par No. Uheri	GPS	Muzam Khan (II)
<b>UC Pir Sadi</b>								
114	1650	Abdul Rashid	Muzam Khan	Par Sadi	54.85	Tardier Mardan	GPS	Gul Ahmad Khan
115	1904	Jehangir Khan	Iqbal Khan	Par Sadi	54.79	Lah Rik Dardaryo	GPS	Tarif Akbar
116	1954	Abdul Hammad	Khan	Par Sadi	53.67	Gulab Darh Mardan	GPS	Tarif Akbar
117	170	Muhammad Ullah	Muzam Khan	Par Sadi	52.32	Par Sadi Mardan	GPS	Tarif Akbar
118	1610	Fazal Amin	Sultan Muhammad	Par Sadi	51.13	Gulab Khan	GPS	Tarif Akbar
119	2118	Muhammad Afzal	Ghazan Muhammad	Par Sadi	50.01	Shahid Muzam Khan	GPS	Shamoon Khan
120	2117	Sajid Khan	Wazir Zaid	Par Sadi	49.34	Pir Sadi	GPS	Par Khan
121	21	Sahz Ali	Muzam Khan	Par Sadi	49.06	Par Sadi Mardan	GPS	Par Khan
122	17	Shah Khan	Aman Ullah	Par Sadi	48.99	Par Sadi Mardan	GPS	Gul Ahmad Khan
123	334	Fazal Ullah	Habib ul Haq	Par Sadi	48.95	Par Sadi	GPS	Khan Khan
<b>UC Qarlani</b>								
124	1763	Muhammad Nadeem	Hamid Khan	Qarlani	54.76	Qarlani	GPS	Qarlani
125	1495	Muhammad Zahid	Zahid Khan	Qarlani	53.50	Zahid Khan	GPS	Qarlani
<b>UC Rustam</b>								
126	873	Avul Muhammad	Qarlani Muhammad	Rustam	55.86	Ada Rustam	GPS	Qarlani
127	1539	Saeed Ullah	Muhammad Khan	Rustam	54.02	Rustam	GPS	Qarlani
128	711	Wajid Ali	Muhammad	Rustam	53.86	Rustam	GPS	Qarlani

Scanned with CamScanner  
**ATTACHED**

1044	Asad Allah	Ghaffar Gul	Rustam	53.76	Tashqand Rustam	GPS	Qambar Abad
1044	Muhammad Ali	Ijab Gul	Rustam	53.52	Rustam	GPS	Qambar Abad
8784	Muhammad Turki	Rizaludin	Rustam	52.65	Hawsoni Rustam	GPS	Qambar Abad
UC Soro Shah							
308	Masir Khan	Said Muhammad	Soro Shah	54.56	Chona	GPS	Fateh Abad
3210	Shah Muhammad	Yusuf Khan	Soro Shah	54.12	Soro Shah	GPS	Fateh Abad
3375	Muhammad Shafiq	Habibullah Muhammad	Soro Shah	53.88	Kadon Shah Qasr	GPS	Hazratnigro Ka
UC Sawal Dher							
65	Muhammad Khan	Masum Khan	Sawal Dher	53.93	Sawal Dher	GPS	Zakhatob Umar
11849	Arshad Malik	Abdul Malik	Sawal Dher	53.70	Sawal Dher	GPS	Sawal Dher No.2
31	Sajid Ali Shah	Sahib Shah	Sawal Dher	54.97	Sawal Dher	GPS	Gus Bagh No.1
336	Abdul Ghafor	Nasir Khan	Sawal Dher	54.56	Sawal Dher	GPS	Sreth
884	Muhammad Harak	Muhammad Harak	Sawal Dher	53.55	Sawal Dher	GPS	Gus Bagh No.2
UC Seri Behlol							
711	Rahim Ullah	Gul Habshat	Seri Behlol	54.18	Py Alad Karbon	GPS	Mogano Pir Abad
935	Hakim Ali	Abdul Ghani	Seri Behlol	55.70	Arabi (Lad)	GPS	Mogano Pir Abad
1408	Muhammad	Muhammad	Seri Behlol	54.99	Hindara Ka	GPS	Mogano Pir Abad
394	Ali Amir	Abdul Shukur	Seri Behlol	54.23	Seri Behlol	GPS	Umar Khan Ka
1226	Feroz Shah	Sarif Rahman	Seri Behlol	53.63	Gandho F (No Road)	GPS	Aizal Abad No 2
9893	Nisar Ali Khan	Fazal Razaq	Seri Behlol	52.90	1 (No Name)	GPS	Haji Banda
951	Syed Wali Shah	Syed Khalid Haidar	Seri Behlol	52.77	Arabi (Lad)	GPS	Aizal Abad No 2
1456	Amir Khan	Amir Khan	Seri Behlol	52.04	Py Alad	GPS	Seri Behlol
1852	Muhammad Khan	Habibullah	Seri Behlol	51.92	Seri Behlol	GPS	Said Amir Ka No.1
469	Nasir Ullah	Amir Khan	Seri Behlol	51.54	Arabi (Lad)	GPS	Seri Behlol
714	Amir Nisar Khan	Amir Zaki Khan	Seri Behlol	50.62	Haji Banda	GPS	Seri Behlol
UC Shahbaz Garhi							
1110	Muhammad Zahir	Fahim Muhammad	Shahbaz Garhi	46.20	Shahbaz Garhi	GPS	Shahbaz Garhi No.4
2191	Haseeb Rahman	Habibullah Rahman	Shahbaz Garhi	46.04	Shahbaz Garhi	GPS	Shahbaz Garhi No.4
983	Muhammad	Muhammad	Shahbaz Garhi	43.36	1 (No Name)	GPS	Shahbaz Garhi No.4
1413	Muz Ali	Ullah Khan	Shahbaz Garhi	43.18	Shahbaz Garhi	GPS	Qaro Banda No.2
2285	Nisar Muhammad	Nisar Muhammad	Shahbaz Garhi	43.35	Shahbaz Garhi	GPS	Qaro Banda No.2
1413	Muz Ali	Ullah Khan	Shahbaz Garhi	43.29	1 (No Name)	GPS	Qaro Banda No.1

ATTESTED  
Scanned with CamScanner

357	1611	Muhammad Lashli	Gilman Mada	Sharno Pur	48.84	Jannayari	GPS	Furqan Khan
358	450	Muhammad Rahnawaz	Aleza or Rehman	Sharno Pur	48.24	Sawa Yan	GPS	Anwar Khan Kai
359	1550	Muhammad Wali	Gul Muhammad	Sharno Pur	48.07	Jabba Mada Khela	GPS	Zor Mandi
<b>UC Sharno Zal</b>								
360	116	Nourel Havar	Milan Zar Khan	Sharno Zal	52.77	Chappal Abad	GPS	Pilagi
361	939	Muhammad Khan	Sher Ali Khan	Sharno Zal	52.08	Chappal Abad	GPS	Chappal Abad
362	804	Muhammad Tabir	Zameen Gul	Sharno Zal	51.45	Chappal	GPS	Chappal Abad
363	801	Ukhi Zada	Gul Zada	Sharno Zal	50.95	Chappal	GPS	Chappal Abad
364	103	Sabir Ali Shah	Shah Pur	Sharno Zal	50.75	Chappal Abad	GPS	Landi Shah
<b>UC Sher Garh</b>								
365	431	Muhammad Akbar	Muhammad Akbar	Sher Garh	56.18	Machhri	GPS	Haji Nadar Sher Kai
366	398	Muhammad Khan	Nouther Khan	Sher Garh	55.2	Sher Garh	GPS	Haji Nadar Sher Kai
367	1452	Aman Ullah	Abdul Hameed	Sher Garh	54.1	Foqr Abad	GPS	Haji Nadar Sher Kai
368	1117	Muhammad Zubair	Said Zar Khan	Sher Garh	52.10	Dakhan Sher Garh	GPS	Ahmad Gul Kai
369	585	Muhammad Ullah	Said Azim Khan	Sher Garh	51.67	Foqr Abad	GPS	Ahmad Gul Kai
370	1453	Aziz ur Rahman	Abdul Hameed	Sher Garh	51.46	Foqr Abad	GPS	Khan Muhammad Kai
371	1126	Muhammad Shah	Awar Shah	Sher Garh	50.83	Sher Garh	GPS	Khan Muhammad Kai
<b>UC Toru</b>								
372	1614	Muhammad Ali	Muhammad Ali	Toru	55.61	Toru	GPS	Kato Khel
373	2191	Muhammad Ahmad	Muhammad Ahmad	Toru	55.65	Toru	GPS	Sultan Abad
374	1230	Khan Zeb	Aurang Zeb	Toru	54.91	Chowsh Kh	GPS	Shoukat Abad
375	1915	Muhammad Ahmad	Muhammad Ahmad	Toru	54.36	Noddi Toru	GPS	Shamshad Abad
376	1493	Muhammad Younis	Khan Muhammad	Toru	53.94	Noddi Toru	GPS	Noddi Toru
377	1650	Fazal Wahab	Abdul Wahab	Toru	53.22	Khat Abad	GPS	Shoukat Abad

**TERMS AND CONDITIONS:**

1. Their appointments are made purely on contract basis for three years and are liable to termination at any time without any notice or reason.
2. They will perform their duty at the same station during the whole three years contract service.
3. Their contract can be renewed after three years if their performance is found excellent as per required policy of the time.
4. They are required to produce health and age certificate from the concerned Medical Superintendent before taking over charge.
5. They are not allowed to take over charge if their age is less than 18 years and above 35 years.
6. They are required to sign contract agreement on judicial paper before taking over charge.
7. Their educational/professional certificate they should get verified from the concerned Board/University before draw of pay and pay should not be withheld till it is verified.
8. In case of bogus testimonials produced out their name on P.T.C. will be registered against their candidate concerned.

**AFFIRMED**

- No P/A/D is allowed.
- 11- They are not allowed to avail pension gratuity etc as mention in the recruitment policy of contract employee 2012.
- 12- They will be governed by contract policy/rules released by the govt. from time to time.
- 13- In case of non availability of vacancy, the appointment order of the junior most candidate will be withdrawn and in any error in the score, the appointment order of the candidate will also be withdrawn.
- 14- They are entitled for annual increment on completion of one year service.
- 15- They will take over charge of the post within 15 days.

(FAZAL RABBI)  
EXECUTIVE DISTRICT OFFICER  
SCHOOLS & LITERACY MARDAN

Enclst: No. 2595-2980 /Appt: PST

Dated 16/10/2004

Copy forwarded to the:-

- 1- Director Schools and Literacy NWFP, Peshawar.
- 2- District Nazim Mardan.
- 3- District Coordination Officer Mardan.
- 4- Deputy Dist. Officers (M) Mardan and Takht Uhar.
- 5- ADD (Library) Mardan.
- 6- District Accounts Officer Mardan.
- 7- Candidate concerned.

(Signature)  
EXECUTIVE DISTRICT OFFICER  
SCHOOLS & LITERACY MARDAN

Qamar

**ATTACHED**

Annexure - B

GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT  
(REGULATION WING)

NOTIFICATION

Dated Peshawar the 06/8/2020

Policy No. EAD/11-3/2020: In exercise of the powers conferred by section 26 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

NOTE NO & 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 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.

*(NADIAH LATIF)*  
DEPUTY SECRETARY (POLICY)

ATTESTED

ATTESTED



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-rule (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.

(WARDAM LATIF  
DEPUTY SECRETARY (POLICY)

~~ATTESTED~~

Annexure - C



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT  
No. SO(Polcy)/P/AD/1/2020  
Dated Peshawar the June 06, 2023

62

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

Subject: GUIDANCE REGARDING DELETION OF ILL & IS IN THE  
KHYBER PAKHTUNKHWA CIVIL SERVICES (APPOINTMENT,  
PROMOTION AND TRANSFER) RULES, 1989.

Dear Sir,  
I am directed to refer to your letter No. SO(Primary-M)P/AD/50127-  
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 Services (Appointment, Promotion and Transfer)  
Rules, 1989 stands deleted vide this department notification dated 06.06.2020; thus, no  
provision exists to decline or forgo promotion.

2. The basic rationale behind the deletion of the ILL rule is aimed at preventing a  
civil servant from temptation for (ill) jobs 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 Services (Efficiency & Discipline) Rules,  
2011, please.

Yours Faithfully,

(Issa Nighamud Khan)  
Section Officer (Policy)

ASE  
7/6

Encl. Of your No & date

Copy forwarded to:-

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

Section Officer (Policy)

ATTESTED



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

No. SO (Primary-MVE&SEO/2-8/2023  
Dated Peshawar lhc. 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

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

(MUHAMMAD ISHAQ)  
SECTION OFFICER (PRIMARY MALE)

Copy forwarded to the:

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

SECTION OFFICER (PRIMARY MALE)

ATTESTED

24

B/c

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(5) IN THE KHYBER  
PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT, PROMOTION  
AND TRANSFER) RULES, 1909.

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 (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 the 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)

WP4442-2023 AZIZULLAH VS GOVT CF PG43

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(5) 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.

Annexure  
D


Sl	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 thorough 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. Razaqat Ullah)  
General Secretary APTA  
Peshawar

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

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

**ATTESTED**

**MINUTES OF THE MEETING REGARDING APPLICATION SUBMITTED BY MR AZIZ ULLAH PROVINCIAL PRESIDENT ALL PRIMARY TEACHERS ASSOCIATION KHYBER PAKHTUNKHWA REGARDING DELETION OF RULE 715 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/N	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) ERSE 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 thorough 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  
ERSE Department

\_\_\_\_\_

Provincial President  
All Primary Teachers Association  
Khyber Pakhtunkhwa

\_\_\_\_\_

(Mr. Razaqat Ullah)  
General Secretary APTA  
Peshawar

\_\_\_\_\_

(Muhammad Ishaq)  
Section Officer (Primary-Male)  
ERSE Department

\_\_\_\_\_

(Abdullah)

Additional Secretary (Establishment)

**ATTESTED**



No. 8145 / P.No. 34/SST/AG/Gatured Cases Dated 2-1-7-2023  
Phone: 091-9223344 Email: establishmentmca@goatk.com

Khyber Pakhtunkhwa, Peshawar

To  
The Section Officer (Primary-Male),  
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-AQE&SED/1-1/ G.M/Min/1 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) deleted Rule 7(3) in the Civil Servants (Appointment, promotion & Transfer Rules 1948) vide notification No. No. SOA-P1 (E&AD)/1-3/2023 dated 06-08-2023.
  - That this office sought guidance from your good office in the following words vide letter No.6987 dated 14-02-2023.
    - (i) How it is obligatory upon the civil servant to accept promotion in every condition.
    - (ii) 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/1-3/1 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 received by this office from your good office vide letter No.SO (Primary-M) E&SED/1-2/Appointment/2023 dated 13-06-2023.
  - 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(3) have affected negatively a huge numbers of Female Teachers. Thus it is proposed that Teachers below DPE-16 may be exempted of implications of the amendment in the rules (b/d) provided they submit their written refusal prior to conclusion of the meeting of Departmental Promotion Committee.

The case is submitted for perusal and necessary actions please.

*[Signature]* 21/7/2023  
Assistant Director (Estab Ad-D)  
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 Ad-D)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa

**ATTESTED**

-B/C-

## DIRECTORATE OF ELEMENTARY &amp; SECONDARY EDUCATION, KPK

To:

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

PESHAWAR  
(21-7-2023)

Subject: Minutes of Meeting

Dear Sir, I am directed to refer to letter No. (SO Primary-M) E&SED/5-1/6/2023/ Minutes of meeting/PST/2023 dated 30-7-2023 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. SDR-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 05-07-2023.
  - (i) Now it is obligatory upon civil servant to accept promotion.
  - (ii) It is prerogative of civil servant to either accept/turndown 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 opinion 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

Asst. Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa.

  
ATTESTED



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

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

Annexure  
E

The Secretary to G.A. 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  
06<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 SHAH)  
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)  
20/8/23

Scanned with ComScanner

**ATTESTED**

- B/c -

- 2 -

No. So (Primary - M) E&SE/8-2/  
 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 (Policy) / E&AD  
 (Primary) / 1-3/2020 dated 31<sup>st</sup> June 2022 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

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

Subject: - GUIDANCE REGARDING DELETION OF RULE 7(S) 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)

Endst. 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.

ATTESTED

SEP 14 2023 11:11:11 AM VS GOVT OF PK

32

- 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- 2/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)

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

Section Officer (Policy)

WP442-2023 AZIZULLAH VS GOVT OF PK43

**ATTESTED**

## 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 26/01/2024



MUHAMMAD AYAZ  
SID ALI HAIDER  
SPST



07/05/2024



1. Learned counsel for the appellant present.
2. Let a pre-submission notice be issued to the respondents through TCS for submission of reply comment. Appellant is directed to deposit US\$ expenses within three days. To come up for reply comments as well as preliminary hearing on 10/06/2024. Leave S.O. PP 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 (E)

*[Handwritten signature]*  
13/5/24

Date of Presentation of Application 12-5-24  
 Number of 1  
 Copy 5/1  
 Urgent 3/1  
 Contd.  
 Date of 13.6.24  
 Date of 12.6.24

ATTEST

**VAKALAT NAMA****BEFORE THE SERVICE TRIBUNAL PESHAWAR****MUHAMMAD AYAZ**

Appellant

Versus

Government of KP &amp; 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.


**APPELLANT****ACCEPTED**


**MUHAMMAD MUAZZAM BUTT**  
Advocate Supreme Court



**MUHAMMAD ADEEL BUTT**  
Advocate High Court



**BASSAM AHMAD SIDDIQUI**  
Advocate High Court