FORM OF ORDER SHEET

Appeal No. 1259 /2024

•	. Apı	oeal No. (859 /2024
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	09/10/2024	The appeal presented today by Mr. Muhammad
1		Muazzam Butt Advocate. It is fixed for preliminary hearing
		before Single Bench at Peshawar on 14.10.2024. Parcha Peshi
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S.A # 1859/24

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHUWA

ROBINA ALI

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.	6-7
4.	Copy of notification No. SD (Policy) EV AD/1-3/2020 dated 06/08/2020	В.	8-9
5.	Copy of Impugned Letter dated June 06th, 2023	. C.	10 - 13
6.	Copy of Minutes of Meeting dated 06-07-2023	D,	14-15
; 7.	Copy of Letter dated 23-08-2023	E.	16-19
8.	Copy of Impugned letter dated 07-09-2023	F.	20
9.	Copy of Representation against the said notification and representation made by APTA President	G&H	21 - 22 23 - 24
10.	Wakatat Nama		25M

ADIOCATE M. Muazan But

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHUWA

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Service Appeal No 1859 /2024

Robina Ali Daughter of Muhammad Ali, PSHT GPS Gosam Ghanam Sha, Tehsil & District Timargar

.....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, 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:

That the Respondents Department appointed the Appellant as Primary School Head
 Teacher.
 Copy of Appointment letter is annexed as <u>Annexure A</u>

- 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.
- 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 solltary 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.
- 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".

- 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 Impugned notification No. SD (Policy) EV AD/1-3/2020 dated 06/08/2020 is attached as Annexure B
- 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
- 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
- n, 1, 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 <u>Annexure E</u>

- 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 <u>Annexure G & H</u>
- That feeling abgrieved 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 effects 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 or 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 grunted promotion to next rank.
- 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.
- If 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 comployee 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 setaside.

- 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 sentority, aspiring for promotion could be promoted.
- i. 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 Honourable Court.

Robinet Deponent Through

Muham And Muazzzam Butt Advocate/Supreme Court

Muhammad Adeel But Advocate High Court

Appellant

Bassaur Albnad Sidliqui Advocate High Court

LL.M- Human Rights

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHUWA

CM No P of 2024	
in Ref to	
Service Appeal No/2024	

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 06/08/2023, TILL THE FINAL DISPOSAL OF CASE IN HAND.

Respectfully Submitted:-

- That the instant application may be treated as part and parcel of service appeal of the appellant.
- 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

Deponent

Through

Muhammad Muazzzam Butt Advocate Supreme Court

Muliammad Adeel Butt Advocate High Court

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Dist. Govt. KP-Provincial District Accounts Office Dir at Timargar Monthly Salary Statement (January-2024)



Personal Information of Miss ROBINA ALI d/w/s of MUHAMMAD ALI

Personnel Number: 00284173

CNIC: 1530603667482

Date of Birth: 24,04,1984

Entry into Govt. Service: 01.04.2004

Length of Service: 19 Years 10 Months 001 Days

Employment Category: Vocational Temporary

Designation: PRIMARY SCHOOL HEAD TEACH

80697499-DISTRICT GOVERNMENT KHYBE

DDO Code: DA6325-Dir Lower

Payroll Section: 001

GPF Section: 001 **GPF** Interest applied Cash Center: 13

GPF Balance:

683,489.00 (provisional)

GPF A/C No: 284173 Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2022

Pay Scale Type: Civil BPS: 15

Pay Stage: 14

	Wage type	Amount		Wage type	Amount
0001	Basic Pay	\$1,640.00	1001	House Rent Allowance 45%	3,524,00
1210	Convey Allowance 2005	2,856.00	1300	Medical Allowance	1,500.00
1923	UAA-OTHER 20%(1-15)	1,000.00	2148	15% Adhoc Relief All-2013	600.00
2199	Adhoc Relief Allow @10%	410.00	2316	Teaching Allowance 2021	3,224.00
2341	Dispr. Red All 15% 2022KP	4,812.00	2347	Adhoc Rel Al 15% 22(PS17)	4,812.00
2378	Adhoc Relief All 2023 35%	17,381.00			0.00

Deductions - General

Ĺ	Wage type	Amount	Wage type	Amourt
3015	GPF Subscription	-4,290.00	3501 Benevolent Fund	-1,200.00
3609	Income Tax	-783.00	3990 Emp.Edu, Fund KPK	-135,00
4004	R. Benefits & Death Comp:	-600.00		0.00

Deductions - Loans and Advances

		· · · · · · · · · · · · · · · · · · ·		1
Loan	Description	Principal amount	Deduction	Balance

Deductions - Incomo Tax

l'ayable:

12,280.18

Recovered till JAN-2024:

5,296.00

Exempted: 3069.93

Recoverable:

84,751.00

3,914.25

Gross Pay (Rs.): 91,759.00

Payce Name: ROBINA ALI Account Number: CA 6056-7

Bank Details: NATIONAL BANK OF PAKISTAN, 230841 NBP TIMARGARA DIR NBP TIMARGARA DIR, KOHAT

-7,008.00

Leaves:

Opening Balance:

Availed:

Deductions: (Rs.):

Earned:

Balanco:

Net Pay: (Rs.):

Permanent Address:

City: munda DIR LOWER

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Tentp. Address: City:

Email: robinsali023@gmail.com

System generated document in accordance with APPM 4.6.12.9(743105/25.01.2024/v3.0)

* Al: a.nounts are in Pak Rupees

* Errors & amissians excepted (SERVICES/02.02.2024/20:09:52)

03/83/14 DEEDTY, SECRETARY ROLLE The Carender, Acadataration Department-Ot results Director (TT) and an inclination of the The Secretary, invoce transministrate Dublic Service Commission, Pashiwith Commission, Pashiwith Commission Commission (Commission Commission C An Autonompustaemi Autonomus outris in tartusi zamanismis. An Autonompus outris in Khyber, pashawa. Ali Depury Comunissione High Count, peshawa. The Registur. Peshawa High Count, peshawa. The Registur. Peshawa Public Service Comunission. The Country of the Coun Avidalnunidas Tadyrik in Station and Salaring Khyber Paklinunich was Andrews Bodies in Khyber Paklinunich was Andrews and Andr All Huers of Anached Departments in Kirver pathiankling. All Divisional Commissioners in Khyber pathunkhwa. The Principal Secretary to Governor Klyber Pakhiunkhwa.

The Principal Secretary to Governor Klyber Pakhiunkhwa.

The Principal Secretary to Chief Minister, Khyber Pakhiunkhwa.

An Divisional Commissionare in Khyber Pakhiunkhwa. All Administrative Secretaries to Gove, of Khyberifabrunhwa. The Schlat Member Board of Revanue, Khyber Pathankliva. Additional Chief Secretary, Oavi, of Khyber Pakhlunthwa, Planning -: or habrancial b BIAG MAYA & ON TRUE CONSUMMENT OF THE INTYDER PARTITION AND CHIEL SECUEIVUA in mie 7. sebemie (2) simil be deleud. **LNEWGNIMY** was further amendancial shall be made, namely: the constant in the Kayber of Secretary of Secretary of Secretary (Secretary Secretary) Rules, 1989, the standard fundamental framework of Transfer) Rules, 1989, the standard fundamental standard framework of Secretary Secreta is the Minister of Khyleet Pakhulikliwh is pleusod to direct that in the Khyleet The chief Minister of Khyller Pakhulikliwin is nienson in the niensen by begilding of the within of the more sense of the powers confirmed by begilding of the powers confirmed by begilding of the powers of the po in extreme of the powers conferred by secultained of the Drogs Von Pertinuarish polo C. MOTTADIMENTON (HEGULATION WING) MINISHMENT DEPARTMEN KIIKBEN KVEHINKEN COMERNIEM OF Annexwe-

-9-

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, namply the

AMENDMENT

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

CHIEF SECRETARY
GOVERNMENT OF THE KHYBER PAKHTUNKHWA

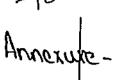
(ANDS); & EVEN DATE

Copy is forwarded to :-

- 1. Additional Chast Se, retary, Govt of Khyber Pakhtunkhwa, Planning & Development Department)
- 2. The Senior Member Board of Revenue, Khyber Pakhtunkhwa.
- n/i.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





ODVERRAIRAT OF REFURE PARTITUREDAYA No. SCHI'olky M. ADJI - 1/2020 Untel Perhawar the June 04, 1813

62

The Covernment of Klipber Published how. Elementary & Secondary Biberson Department.

Subject: -

CHUPANCE HEGARDING DIRECTION OF THE 7(5) IN THE KHYPER PARITUSKHIVA CIVIL SHIVANTH (APPINTMENT, EROMOTHER AND THANSPERLINDLES, 1989.

I am directed to reter to your letter No. SO(Primary-My/IASSIII)/I-Ocas Str. 2/Appelnimen/2023 placed (\$.04.2023) my the subject agreed obove and to stole that Sub-Stule (3) of Rule-7 of Khyber Pathlankhau Chri Servans (Appolitiment, Promotion and Transfer) Rules, 1989 stands deleted vide this department and filentino dated 06.08.2020; thus, so branchis arrives to receive at teres beamories.

- The basic entensis school the selection of the ibid rule is simed at preventing a aivi) servant from temptation for filicit gain by sticking to a single incretive position or to prevent those who trad to force prematica to evide posting/transfer or show tack of expactly to tackle higher responsibilities in case of promutes. Therefore, it is obligatory upon every civil servant to accept promotion to overy camiltion.
- Funhermore, those officers/officials who do not comply with promotion order of the competent authority or my to evade promotion through different messes that be proceeded ogelast under Khyber Pathicultime Civil Servents (Afficiency & Discipline) Rufes, 2011, picase.

Budst. Of even Na & Hale

Copy forwarded to the:

P5-to Special Georgical (Res): Little Minuscal Copering to Additional Secretary (Res)-III, Little Minuscal Copering to Copering Secretary (Palley), Little Minuscal Copering Secretary (Palley), Little M

4447-2023 AZIZULLAH VS GOVT OF PG

GOVERNMENT OF KHYBER PAKHTUNKHWA ESTABLISHMENT DEPARTMENT (REGULATION WING)

To

The Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department.

Subject: <u>GUIDANCE REGARDING DELETION OF RULE 7[5] IN THE KHYBER PAKHTUNKHWA CIVIL SERVANTS(APPOINT, MENT; PROMOTION AND TRANSFER) RULES 1989</u>

^{ly i}Dear Sìr.

i am directed to refer to your letter No SO(Primary.M/E&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(Appointment, 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 ibid rule is aimid 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 lorge 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. Further 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 Pakhtonkhwa Civil servants (Efficiency & Discipline) Rules, 2011, please

Yours faithfully, (Issa Muhammad Khan) Section Officer(Policy)

(Endst), of even No & date

Copy is forwarded to :-

PS to Special Secretary (Reg), Establishment Department.

PA to Additional Secretary (Reg-II), Establishment

PS to Deputy Secretary(Policy), Establishment Department.

Section Officer (POLICY)

AFTESTED

FOVERNMENT OF KHYBER PAKHTUNKHWA ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT CIVIL SECRETARIAT PESHAWAR

(Finano No.091-8223587)

Nn.50 (Primary-MYESSED/2-6/2023 Eroled Peshaviar the, June 25",2023

Tr,

The Director

Elementary & Secondary Education Department Khyber Pakhlunkhwa, Peshawar.

Aziz Ullah Khan President

Ali Primary Teacher's Association, KP

. Subject:

GUIDANCE REGARDING DELETION OF RULE 7(5) IN THE KHYBER PAKHTUNKHWA CIVIL SERVANTS JAPPOINTMENT, 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. 50 (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 Chalimanship of Addillonal Secretary (Estab) E&6E Department in his office.

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

End: A.

(MUHAMMAD ISHAO) SECTION OFFICER (PRIMARY MALE)

Copy forwarded to the:

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

SECTION OFFICE

447-2723 AZIZIALIAH VE GOVT GF FG(3

13°

No SO (Primary-M)/B&SSD/2-6/2023 Dated Peshawar the June 254 2023

To

1.19

The Oirector Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar

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

Subject

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

I om 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 to 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 Pakhbunkhwa.

SECTION OFFICER (PRIMARY MALE)

WP4412-2023 AZIZULLAH VS GOVT CF PG43

ATTESTED

mentic

MINUTES OF THE MEETING REGARDING APPLICATION SUBMITTED BY ME. AZIZ BILLAH PROVINCIAL RESIDENT ALL PRIMARY TEACHERS ASSOCIATION KNYBER PAKHTUNKHWA REGARDING OF DELETION OF RIVE 7/53 IN THE CIVIL SERVANT (APPOINTMENT, PROMOTION & TRANSFER RULES 1989).

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

	 .	•
50	HAM	DESIGNATION
<u> </u>	Mr. Fazal Wahld	Dupuly Director Establishment of Directorals Elementary & Secondary Education Department
2	Mr. Aziz Ullah	Provincial President All Primary Teachars - Association Khyber Pakhtunkhwa
	Mr. Raiogal Ullats	General Secretary AFTA Peshawar
4	Muhammad Ishaq	Section Officer (Primary) ELSE Department Civil Secretarial Khyber Pakhtunkhwa Peshawar

- 2. The meeting started with racitation from the Hoty Quran, the chair welcomed the participants. The Deputy Director (Establishment) of Directorate of Elementary & Secondary Education bileted the forum regarding agenda item in detail.
- 3. After litreochaire discussion il was decided that Directorate of Bernentary & Secondary Education Department may examine the case properly and submit a self-contained/consolidated case for anward submission to Establishment Department for further necessary action.

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

(Mr. foral Wahld) Deputy Director-I EASE Department

(Mr. Ralagat Wah)

(No /Asiz UBah)
Provincial President
Primary Teochers Association
Onyber Patritunishwa

(Muhahimad (Mad) Section Officer (Primary-Male) ESSE Department

(Abdullah) Additional Secretary (Eslabilshmani) E4SE Department

. WP4443-2023 AZIZIRLAH VS GOVT CP PG43



-B/c-

MINUTES OF THE MEETING REGARDING APPLICATION SUBMITTED BY MR AZIZ ULLAH PROVINCIAL PRESIDENT ALL PRIMARY TEACHERS ASSOCIATION KHYBER PAKHTUNKHWA REGARDING OF DELETION OF BULE 7(5) IN THE CIVIL SERVANT (APPOINTMENT, PROMOTION & TRANSFER RULES 1989).

A meeting regarding the subject matter was held on 06-07-2029 at 11:00 AM under the Chairmanship of Additional Secretary Establishment in his office. The following attended the meeting

SII NAME	DESIGNATION
1 Mr. Fazal Wahid	Deputy Director Establishment of Directorate Elementary & Secondary Education Department
2 Mr. Aziz Uliah	Provincial President All Primary Teachers Association: Khyber Pakhtunkhwa
3. Mr. Rafaqat Ullah	General Secretary APTA Peshawar
4 Muhammad Ishaq	Saction Officer (Primary) E&SE Department Civil Secretarial 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 & 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 Associat	lon
Khyber Pakhtunkhwa	· · · · · · · · · · · · · · · · · · ·
(Mr. Rafaqat Ullah)	
General Secretary A, TA	· · ·
Peshawar	
Muhammad Ishaq)	
ection Officer (Primary-Male	j ·
:&5E Department	
	(Abdullah)
	William Sezurban Lean lehende

ATTESTED



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

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

Duvering

You Secretary to GoviL of Khyber Palchtunkhwa. Establishent & Administration Department.

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

ø

I am directed to refer to your letter No. SO(Policy)/ EBAD/ 1-3/2020 dated 06" June 2023 and to state that after deletion of rule 7(5) Khyber Pakhtunkhwa Civil Servens (Applicatment, Promotion & Transfer Rules 1989) It has been intimated that those officers/ officials who do not comply with promotion order of the competent authority or by to evade promotion through different means shall be proceed under Khyber Petanounidava Ovil Servant (Efficiency & Discipline) Rules, 2011.

- in this connection it is submitted that in some cases lady teacher of primary leviel who avail such promotions have to face serious inconvience 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.
- In view of the above, the said amendment may be reconsidered to the 3. extent of lady tracher in primary schools.

DAUHAMBAN IST SECTION OFFICER TRIVARY HALES

Copy (orviarded to the:

1. Olrector EBSE Khyber Pakhbunkhwa.

2. PS to Secretary, EBSE Department Knyber Pakhtunghwa.

SECTION OFFICER IP

Scanned with ComScanner

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442-2023 AZIZULLAH VS GOVT CF PG43

Pedrama Dated Lindhoguston. 18-8 (13233 (M-1900) 2.010 CSAS | 2849 - tambiagal

Peshausas. Establishment and Administration Departments, The Secretary to Government of Khyba Pakharahaura.

(6864) Chi Servant (Asportanent, Amalian & Transfer Rules. Guidance regending deletion of Rule 7(5) in the \$123(BUB)

Civil Servant (Efficiency and Discipliz) Rate 2012. different means shall be proceed under khyber Arkhhinikhua algorith restraining strains of but to extraorities tristisgines with to these officers officiall who do not comply with promotion order tail betwrited need soil 40 (PSPL sould referrent tons rational diletion of Bule 7(5) Khyber Rithtunthius Civil Servant (Appaintment) with tast state of lam Eccanillity betab arac (E-1) Part directed to refer to your setter No. 50 Printed Dear Sir,

-21 carles of lody teacher in primary schools. in view of above, the said ammarahimmt may be reconsidered to offices on service delinery Mahay-in-law who need asse, In such casu there are negative Most of them one manied with Lids and elder father of willingt teaperart / Sixtrabinar on other Enathors tratamer with rif estrub modern that they have to people duties of gray rationary the liver other bound from the ratheast : In this connection it is submitted that in some cover body

(Muthomand Island)

Section Offices (Pulmy)

(Muthomand)

Committed through transming 32 4 3, protocol of 29 Director E & SE Klado Rehabelhung.

Capy forwarded to;

FI TO TYOO BY HAJJAUSISA GEOS-EI Acmening & Secondary Education. Alyber Pathrankhun (1-144 at 23) set mil I in mil ELA אמטווי כפףא PA to Directo mt27/IG [다 שוקוה אס Ciap The Partie of Control of Con フ The standing of permissions are received believe please. CIVII ERITORI IN OCCUPI PREMISSION MENER EVENY COMPUTER. IL CONGROUCH PRODUCTIVE PRODUCTIVE AND CONGROUCH PRODUCTIVE AND CONGROUCH PRODUCTIVE AND CONGROUCH PRODUCTIVE AND CONGROUCH PRODUCTION OF THE MINISTER OF MENDING AND E-00-1003. Reld under the Chairmouth of the open, that affect to glocaling and follow that the delicition of Minister Chairmouth of the open, that affect to glocaling and the open consolidated exist.

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(2) House the previous the civil sevent to the coccept in the day of the civil sevent to the concept of the civil of the civil sevent to the concept of the civil provided the civil of Door Sir.

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-BIC-

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION, KPK

PESHBUMP [21-7-1013]

Section Office (Primary Male)
Elementary & Sicondary Education Department
KPK, Rishawar.

Subject . Minutes of Meeting

To:

Dear Sir; I am directed to refer to letter No. (50 Binary -M) E & SED /5-1/GNBL/ Ministes of meeting /857/2019 deled 20-7-2023 on subject cited above and to present brief history, about background of case as under.

That Government of the Establishment department (Regulation Wing) abstract mile 7(5) for Civil Servots (Appointment, promoting Transfer Role 1971) vide notification No. No. 50R-VI(ESAD)1-3/2020 dated 00.08-2020.

· That this infice earth guidance from your good infice in the following words vide latter No. 6987 defed ob-overong

(i) Now it is obligating upon o'll secused to decept promotion.

(Till is presignative of civil scarant to effer accept/transform the

• That your good office forwarded the come to questes concerned vide leiter No. So (Primary M) EGSED/2-2/Appointment 2023 for necessary

- Front the government of KP-ED (Regulation Wing) vide leter No. 50 (Policy) EG-AD (1-3) 2070 dated 6-06-2073 categorically stated that there exists no provision to decline I forgo promotion. It is abligating upon every civil severant to accept partition under entry 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(5) have affected negatively a huge members of Pernale teachers.

please. The case is "submitted for person and necessary: actions

Copy of the objust to;

1. PA to Director Local Directorate

2. Master Copy

Acidand Director

Elementary & Secondary Educas, Kingles Rechlonichula.

WP4443-2073 AZIZUALAH VE GOVT OF PG43

ATTESTED



GOVERNMENT OF KHYBER PAKHTUNKHWA ESTABLISHMENT DEPARTMENT

No. SO(Policy)E&AD/1-3/2020 Dated Peshowar the September 07, 2023

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

Subject: -

GUIDANCE REGARDING DELETION OF RULE 7(5) IN THE KHYBER PAKHTUNKINYA 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).

Your faithfully,

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.

-21-Annexure-G

To,

n/s

- Secretary to Government of Khyber Pakhtunkhwa, Establishment Department, Civil Secretariat, Peshawar
- 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 nomication No. SD (Policy) /EDAD/1- 3/2020 dated 06/08/2020, the right of foregoing of proportion 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 ever, 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 Khaber 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 he proceeded under the Khyber Pakhtunkhwa Civil Servant (Efficiency & Discipline) Rules,

It is, therefore, humbly prayed that on the acceptance of the instant representation; the Notification bearing No. SO (POLICY) EXD/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 ____/0_f*:027:

ц,

Robin Ali

MUHAMMAD ALI, PSHT. - B C-

GOVERNMENT OF KHYBER PAKHTUNKHWA ESTABLISHMENT DEPARTMENT No. SO(Policy)&&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 OP RULE 7(5) IN THE KHYBER PAICHTUNKHWA CIVIL SERVANTS (APPOINTMENT, PROMOTION AND TRANSFER) RULES, 1989.

Dear Sir.

I am directed to refer to your letter No. SD(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)

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.

Section nicer (Policy

WP4442-2073 AZIZULLAH VS GOVT OF PG43

ATTESTED

Rhyber Pakhtunkhwa

.10/2 Ulfali Khan President O 0331.044544 . czasnah1973@gmd

آل برائمری میچرز ایسوی ایش (ایٹا) جیبر پخشوشخوا

Hovering -

عمر: يكول المنزل 4 يكارى اع يميلون بهر الريائرل لج وحوق التى فيريخوالما بعب الل

کڑول ہے کہ بدمونیز پر علیے علی ہے اور اور مرکارل علام کا فیصل ہوئے بدمونیز کا ایک تافیل اٹیا کر تافیا کہ 12 مال ایک اگر کل جید کے قدے ایک وقد پر موفود کی جورہ بمر ایک موسولا میں ہے کہ سے سطاب بد مثل بحد پر اس کا براس انٹر نھی اوعل کی

ہیں۔ مدید در پرمورد علی ہوں ہو امد یہ مقاعہ پرمور میں ہے سے صفیہ ہم میں ہم ہرائی و ہرائی میں اسم کا اسکا ، ، ہم اس ہمان علی فوال دمایت مال کیا ہد میں ملک ہفتہ فوج کر مال کی کہ اگر ایک ہوم ایک میل پردوئی دیگی آ وہ دومرے مال لے سکل ہے جس کے معاتی میں ہم عام پدونی شود کی کے اگر کی گئی کے 1 اس کے متل ال بھال مال کے معاتی کندنا کر کے کا کہ کہا ہے ۔ سامل ہے آوی دلیکیش بدان ملسل حول کی کل متالہ عملاے ہم کی اسد معدالہ بھیل منازی عمل کر فرائی مسائد کر امتی ا 6 LZESUL

س الله على المراد مع (دوعا 10 الله المركب ال تلمت اہ او کے سے بھایا بلیج

کے کا واقعی ہے گئے ہے۔ الیکھی ہفتاہ ہے تا ہامران ہماتاء کو اتنا طوہ ہے کسا کا سلسلے شرحا ہوتا ہے لاا ہم یہ وقتی دیکے ہل کہ کہ سامیان فیل ایکٹی لگر میہ ہرے ہنا وکل ہماتاء شرحا فیمیل پراکران ہماتاء کو ان وائل ا

آل پرائری تجرز ایس ایش نیر بخونزا

12-2073 AZIZULLAH VS GOVT GF PG43

07.05 2024

temmed counsel for the appellant present.

2. Let a pre-admission notice be issued to the respondents through TCS for submission of reply/continents. 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.P 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.

decrified to be true cupy(Muhammad Akbar Khan)

Member (E)

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JAKALAT NAMA

BEFORE THE SERVICE TRIBUNAL PESHAWAR

ROBINA ALI.

Versus

Appellant

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 detend) 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.

Lagree 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