


# FORM OF ORDER SHEET

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

**Appeal No.** 1871 /2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	10/10/2024	<p>The appeal of presented today by Mr. Tahir Sajid Advocate. It is fixed for preliminary hearing before touring Single Bench at A.Abad on 28.10.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

S.A # 1871/2024

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


Shahid Shuja Uz Zaman.....Appellant

**Versus**

Secretary to Government of Khyber Pakhtunkhwa and  
others.....Respondents

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ADVOCATE

①

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

**Service Appeal No. 1871/2024**

Shahid Shuja Uz Zaman son of Sher Muhammad PSHT,  
BPS-15 at GPS Pano Dheri Circle Khaki, Mansehra Date of  
Appointment 13.11.1994.....**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 NO. SO(Policy)E&AD/1-  
3/2020 DATED 06.08.2020 COMMUNICATED BY  
RESPONDENT NO. 2 VIDE LETTER DATED  
06.06.2023 WHEREIN IT WAS STATED THAT SUB  
RULES 5 OF RULE 7 KHYBER PAKHTUNKHWA CIVIL  
SERVANT (APPOINTMENT, PROMOTION AND  
TRANSFER) RULES, 1989 STANDS DELETED.**

**P R A Y E R:**

**ON ACCEPTANCE OF INSTANT SERVICE APPEAL,  
THE IMPUGNED NOTIFICATION NO.  
SO(Policy)E&AD/1-3/2020 DATED 06.08.2020  
COMMUNICATED BY 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 HONORABLE  
TRIBUNAL DEEMS FIT AND PROPER IN THE  
CIRCUMSTANCES OF THE CASE MAY ALSO BE  
GRANTED TO THE APPELLANT.**

**Respectfully Sheweth!**

- 1) That, the respondents Department appointed the  
appellant as Primary School Head Teacher.

(Copy of appointment letter is  
annexed as Annexure "A")

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- 2) That, the Khyber Pakhtunkhwa (Appointment/Promotion/Transfer) Rules, 1989 as well as other sister services of the other provinces and Federation as well, availing of promotion by the employee 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 conditions 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, Promotion Rules, 1989.
- 4) That, Government of KP without following the rules position mentioned in Para 6 above promulgated notification SO(POLICY)E&AD/1-3/2020 dated 06.08.2020 communicated to respondent No. 2 vide letter dated 06.06.2023 wherein, it has been made mandatory to the employee 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. 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 notification number SO(POLICY)E&AD/1-3/2020 dated 06.08.2020.

(Copy of impugned notification No. SO(POLICY)E&AD/1-3/2020 dated 06.08.2020 is annexed as Annexure "B")
- 6) That, the Director of Elementary and Secondary Education KPK, 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 06.06.2023 directed the respondent no 3 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 06<sup>th</sup>, 2023 is annexed 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 and 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 Rules, 2023 dated 23.08.2023 to reconsider the amendment made in KPK Civil Servants, Appointment, Promotion and Transfer) Rules, 1989 as it had negatively affected a large number of teachers.

(Copy of letter dated 23.08.2023 is annexed as Annexure "E")

9) That, the respondents, vide its letter dated 07.09.2023 directed the Directorate of Elementary & Secondary Education KPK 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 KPK Civil Servants (Efficiency & Discipline) Rules, 2011.

(Copy of impugned letter dated 07.09.2023 is annexed as Annexure "F")

10) That, the petitioner feeling aggrieved, filed representation to respondents in person and also approached to respondents through APTA President but the grievances of the appellant have not so far been redressed.

(Copy of representation against the said notification is annexed as Annexure "G & H")

11) That, feeling aggrieved from the letter dated 06.06.2023 and 07.09.2023 and the deletion of Rule 7(5) in KPK Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the petitioner file 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 notification cannot be

given retrospective effect of valid notification which confer rights is always applicable with prospective effect, however, if an amendment notification that adversely effects the interests of the employees or causes disadvantages 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 employee 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 employee were permanently debarred from availing the facility of promotion during their entire services. Hence, the employees himself 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 set-aside.

D) That, it is further submitted that on account of grant of promotion some employees who are suffering from several 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 his promotion it must be optional for the employee as to whether to avail or forego to benefit. 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 from 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 childrens as well as ailing dependent family members and in these circumstances in the presence of impugned notification dated 06.08.2023 communicated on 06.06.2023 would not be able to serve in the Department and which shall amount to the snatching of bread and butter of the poor employees.

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**Prayer:**

It is, therefore, humbly prayed that on the acceptance of the instant service appeal; the impugned notification bearing No. SO(POLICY)E&AD/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.*

*[Signature]*  
Appellant

Through: -

*[Signature]*

Tahir Sajid Advocate,  
High Court, District  
Courts, Manshra

**Affidavit**  
I (the appellant) solemnly declare that the contents of foregoing service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honorable Tribunal.

*[Signature]*

*[Signature]*  
ATTESTED  
08/10/24

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**BEFORE THE SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA**

C.M No: \_\_\_\_\_ -P of 2024-10-08  
in Ref to  
Service Appeal No. \_\_\_\_\_ /2024

Shahid Shuja Uz Zaman.....Appellant

Versus

Secretary to Government of Khyber Pakhtunkhwa and  
others.....Respondents

**APPLICATION FOR SUSPENSION OF IMPUGNED  
NOTIFICATION BEARING NO. SO(POLICY) E&SD/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.**

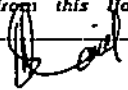
Respectfully submitted: -

- 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 appellants.
- 3) That, there is likelihood success of the appellant in the lis. And if the notification bearing No. SO(POLICY)E&AD/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 right of the appellant is involved in this case.

In view of the reason, it is humbly requested that the notification bearing No. SO(POLICY)E&AD/1-3/2020 dated 06.08.2020, communicated to respondent No. 2 by respondent No. 1, vide letter dated 06.06.2020 may kindly be suspended till the final disposal of the main appeal in hand.

Appellant

Through: -

<p><b>Affidavit</b> 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 Tribunal.</p> 
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Tahir Sajid Advocate  
High Court, District  
Courts, Manshra

**ATTESTED**





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ANN: DATED 15-11-1991

APPOINTMENT

Consequent upon their selection on merit, the following PTC Trained candidates are hereby appointed in EPS No.7 @ Rs.1420-31-2550 plus usual allowances as admissible under the Rules w.e.f the date of their taking over charge against the newly created/vacant posts in the schools given tk against their names in the interest of Public Service.

S.NO	NAME & FATHER'S NAME	RESIDENCE	PLACE OF POSTING	REMARKS
1.	S.Malang Shah S/O S.Akbar Shah	Tilli (Kund)	GPS Garhi A/Zai	A/V/
2.	Umar Zareen S/O Muhammed Zar Dour	Mera	GPS Manja Kote	---
3.	Gul Sharir Said S/O S.Haroon Shah	Zunglay (A.Z)	GPS Bimbal	---
4.	Sher Haider S/O Aurangzeb	Japeet	Kand Bala	---
5.	Hussain Ahmad S/O Azizur Rehman	Choond M.K	GPS Bartoo..	---
6.	Muhammed Nacem S/O Muhammed Younis Khan	Sereri	GPS Kotkoy	---
7.	Muhammed Shohaib S/O Azizur Rehman	Choond M.K	GPS Choond M.K	---
8.	Sahib Zada S/O Muhammed Sadiq	Gawandla	GPS Nadray	---
9.	Sardar Behader Shah S/O Noor Ahmad	Shah Zunglay AB	GPS Batecla	---
10.	Afsar Muhammed S/O Taj Muhammed Khan	Kamsisar	GPS Dore Mera	---
11.	Ihsanullah S/O Wahidullah	Zunglay	GPS Chiro Kote	---
12.	Muhammed Saleem S/O Baz Muhammad	Kamsisar	GPS Solemani	---
13.	Tarweer Ahmad S/O Muhammad Khan	Karlal(Behali)	GPS Kunhar	---
14.	Muhammed Saeed Ahmad S/O Azizur Rehman	Date	GPS Kandar Tawara	---
15.	Azhar Bilal S/O Ghulam Mustafa	Nogazi	GPS Zungia K.D	---
16.	Muhammed Tufail S/O Abdul Ghani	Pothe	GPS Chamb Kilagay	---
17.	Saifur Rehman S/O Shafiqur Rehman	Karer	GPS Doba KD	---
18.	Arshid Naseem S/O Muhammed Naseem	Bele L.Kote	GPS Balyani	---
19.	Mazharul Haq S/O Afzal Haq	Banda Balola	GPS Darbani.	---
20.	Muhammed Rashid S/O Ghulam Sarwar	Chakia	GPS Darbani.	---
21.	Muhammed Imtiaz S/O Fazalur Rehman	Bission	GPS Sachka.	---
22.	Qaiser Naeem S/O Ghulam Jan	Chakia	GPS Lashora.	---
23.	Naeem Ejaz S/O Muhammed Iqbal	Chanana.	GPS Zeeko Rai	---
24.	Muhammed Ejaz S/O Abdur Rashid	Banda Baloda	GPS Zeeko Rai	---
25.	Iftikhar Hussain Shah S/O S.Maqbool Sh:	Nakote	GPS Kirore.	---
26.	Latifur Rehman S/O Muhammed Yousuf	Hari Mera	GPS Phag Ban	---
27.	Sultanul Harifeen S/O M.Magafar	Iqbal Hari Mera	GPS Phag Ban	---
28.	Ibsdur Rehman S/O Gul Faraz	Kotli Payeen	GPS Gauri Bala	---
29.	Muhammed Saleem S/O Mazafar Khan	Baffe	GPS Jari Kandow	---
30.	Mazhar Hussain S/O Muhammed Barcof	Terangri Bala	GPS Kassay Shatal	---
31.	Iftikhar Ahmad S/O Muhammed Farcof	Dhondal	GPS Bamba Dada	---
32.	Iftikhar Ahmad S/O Muhammed Jafan	Shinkieri	GPS Saray Akharay	---
33.	Akhtar Saad S/O Muhammed Saad	Banda	GPS Bamba	---
34.	Akhtar Zoh S/O Abdul wayum	Kotli Bala	GPS Karna	---
35.	Shakirullah S/O Shafi Ullah	Baffe	GPS Soorban	---

36.	Tajwar Sultan S/O Ghulam Nabi	Tarangri Bala GPS Mera.K.K	Ag:V/post.
37.	Muhammed Naseem S/O Muhammad Farid Shanai Bala	GPS Shingal Dhar	---d---
38.	Fazal Rabi z S/O Ghulam Samdani	Baffa	GPS Daddam ---do---
39.	Muhammed Shafrque S/O Muhammad Miskin Dhodial	GPS Dharoo.	---do---
40.	Muhammed Shoki S/O Ghulam Farid	Dhodial	Mosq:Kaleesh KD ---do---
41.	Chan Zeb S/O Khan Wali	Khan Dheri	Mosq:Abu Shanaya ---do---
42.	Habibur Rehman S/O Khalilur Rehman Tanda		Mosq:Nambal. ---do---
43.	Bashir Ahmad S/O Ghulam Hassan	Hafiz Bandi	Mosq:Abu M.Khel ---do---
44.	Muhammed Akbar S/O Muhammad Sabir Batang		Mosq:Jiggel ---do---
45.	Gul Faraz S/O Sarfaraz	Khawajgan	Mosq:Saibay H.Z. ---do---
46.	Noorul Islam S/O M.Shabir Ahmad	Koray	Mosq:Geetay KD ---do---
47.	Shaukat Ali S/O Abbas Khan	Kotli Payeen	Mosq:Mera A/Zai ---do---
48.	Anjam Saecd S/O Saedur Rehman	Nokote	Mosq:Surmal. ---do---
49.	Niaz Ali Shah S/O Ali Akbar Shah	Dadar.	Mosq:Chawang ---do---
50.	Muhammed Farooq S/O Ghulam Rabbani	Balakote	Mosq: Seri Tota. ---do---
51.	Naseer Ahmad S/O Basheer Ahmad	Kashtara	GPS:Gali Ghanool ---do---
52.	Muhammed Naseem S/O Muhammad Yusuf Patlang.		Mosq:Kotkey Manoor ---do---
53.	Sabir Hussain S/O Baz Gul	Sangar	GPS:GPS Lohar Benda ---do---
54.	Muhammed Rafique S/O Ghulam Nabi	Ghanool	GPS Andrasi ---do---
55.	Muhammed Arshid Farooq S/O Ali Asghar Khan Jabbi		GPS Shekiran ---do---
56.	Imdad Hussain S/O Yar Ali	Sangar	GPS Mahandri Vill: ---do---
57.	S. Ishfaq Hussain Shah S/O Ali Asghar Shah	Talhatta	GPS Badalgran ---do---
58.	Muhammed Irfan S/O Mir Zaman	Kanshian	GPS Seri Manoor ---do---
59.	Mushtaq Ahmad S/O Abdullah	Sangar	GPS Bela Manoor ---do---
60.	S. Ibadat Shah S/O S. Umer Shah	Kanshian	GPS Buttian Manoor ---do---
61.	Liaqat Hussain Shah S/O Ghazi Shah Kanooch		GPS Naka Jared ---do---
62.	Arshid Mehmood S/O Muhammad Alam	Garlat	GPS Dhanoo ---do---
63.	Muhammed Sharif S/O Muhammad Daud	Sawer	GPS Choshal ---do---
64.	Saneur Rehman S/O Habibur Rehman	Shohal Mazullah	GPS Bhattian ---do---
65.	Zehid Jamil S/O Masoodur Rehman	Patseri	GPS Kunda ---do---
66.	Muhammed Mushtaq S/O Ghulam Sarwar	Bhoonja	GPS Harva ---do---
67.	Khurshid Anwar S/O Ghulam Din	Arban.	GPS Buddi Da Naka ---do---
68.	Dil Muhammad S/O Sharab Khan	Seri Garlat	GPS Budi Da Naka ---do---
69.	Munir Ahmad S/O Abdur Rashid	Shohal Mazullah	GPS Gali Dhanoo. ---do---
70.	Hakim Khan S/O Shah Zullah	Chajar. Payeen	GPS Chijri Payeen ---do---
71.	Muhammed Fiaz S/O Aftar Khan	Ghanian	Mosq: Jilal Abed ---do---
72.	Sardar Behadar S/O Haroon Khan	Sachen Kalan	GPS Surbanj. ---do---
73.	S. Nadim Hussain Shah S/O Zafar Ali K Shah Bai Bala		GPS Daga Sharkool ---do---
74.	Nasir Mehmood S/O Abdul Wadood Khan Keri		GPS Jabbar ---do---
75.	Essir Mehmood S/O Muhammad Ismail Kanog		GPS Kayan ---do---
76.	Shah Nawaz S/O Dolat Khan	Shahdore	GPS Malockra. ---do---
77.	Wazizur Rehman S/O Muhammad Shafee	Kundar	GPS Mohri. ---do---
78.	Muhammed Fiaz S/O Muhammad Nawaz	uzbails	GPS Mohri ---do---

Contd: Page No.....

			A.V/Post.
1. Muhammad Imran S/O Abdullah Jan	Barkote	GPS Sundi	---do---
2. Mazhar Hussain S/O Iftikhar Hussain Shamdara		GPS Bhandar.	---do---
3. Wajid Raza S/O Muhammad Raza	Malga	GPS Bhandar.	---do---
4. Muhammad Shakeel S/O Muhammad Suleman Tarkher		GPS Chungeri	---do---
5. Muhammad Nawaz S/O Muhammad Jamshed Gali Badral		Msq: Doga Miangan	---do---
6. Niaz Muhammad S/O Behran	Battlay	Msq: Kali Gatti	---do---
7. Abdur Rashid S/O Rehmat Ullah	Sher garh	Msq: Kharee Ahmad Abad	---do---
8. Gul Faraz S/O Muhammad Yunis	Shergarh	Msq: Chitta Batta (Shergarh)	---do---
9. Muhammad Khurshid S/O Shah Zaman	Gul Dheri	Msq: Badral	---do---
10. Muhammad Riaz S/O Ghulam Jan	Ram Koté	Msq: Khera Khairoo	---do---
11. Muhammad Riaz S/O Abdur Razaq	Bhato Bandi	Msq: Shamal Bandi	---do---
12. Muhammad Yunis S/O Khalilur Rehman Scri Jhand		Msq: Abbi Behn.	---do---
13. S. Amin Shah S/O Rehmat Shah	New Darband	Msq: Saleya Shungli.	---do---
14. Muhammad Irfan S/O Ali Akber	Kala Mera	Msq: Neel Batla Bala	---do---
15. Attiqur Rehman S/O Maqboolur Rehman Nambal		Msq: Kangroorian	---do---
16. Muhammad Safer S/O Taj Muhammad Khajamber		Msq: Milkhawani	---do---
		Msq: Khajamber	---do---

TERMS AND CONDITIONS.

1. They should submit their charge reports to all concerned.
2. Their appointment is purely on temporary basis and liable for termination at any stage without assigning any reason.
3. Their appointment is subject to the verification of their original Academic and Professional certificates/documents. Their original Academic & Professional certificates should be checked thoroughly before handing over the charge and should not be handed over the charge if their original certificates are not found correct. No one should be handed over charge if he is below 18 years and above 30 years in case of the candidates relating to Zone III and 27 years of others.
5. Their pay will not be drawn until they produce age & Health certificate from Medical Superintendent D.H.Q Hospital Mansehra.
6. They will be governed under prescribed service rules framed by the Govt. of N.W.F.P.

( MUHAMMAD SHAH )  
 I/C DISTRICT EDUCATION OFFICER,  
 (MALE) PRIMARY MANSEHRA.  
 Dated Mansehra the 13 / 11 / 1994.

Endst: No 2201-2301/GB(G/I V) dated Mansehra the 13/11/94.

Copy forwarded to the:-

1. Secretary to Govt. of NWFP Education Department Peshawar.
2. Director Primary Education NWFP (Dyetsbad) Peshawar.
3. District Education Officer Mansehra.
4. Local Education Officer (Male) Mansehra
100. All the candidates concerned.
101. Superintendent local office.

I/C DISTRICT EDUCATION  
 (MALE) PRIMARY

(7A)  
 Dist. Govt. KP-Provincial  
 District Accounts Office Manshra  
 Monthly Salary Statement (August-2024)

ANNEXURE



Personal Information of Mr SHAHID SHUJA UZ ZAMAN d/w/s of SHER MUHAMMAD

Personnel Number: 00219001 CNIC: 1350422127829 NTN:  
 Date of Birth: 01.06.1975 Entry into Govt. Service: 14.11.1994 Length of Service: 29 Years 09 Months 019 Days

Employment Category: Active Permanent

Designation: PRIMARY SCHOOL HEAD TEACH 80003206-DISTRICT GOVERNMENT KHYBE

DDO Code: MA6145-Manshra

Payroll Section: 001

GPF Section: 001

Cash Center: 4

GPF A/C No:

GPF Interest applied

GPF Balance:

1,125,615.00 (provisional)

Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2022

Pay Scale Type: Civil BPS: 15

Pay Stage: 21

Wage type	Amount	Wage type	Amount
0001 Basic Pay	65,500.00	1001 House Rent Allowance 45%	3,524.00
1210 Convey Allowance 2005	2,856.00	1300 Medical Allowance	1,500.00
1505 Charge Allowance	40.00	2148 15% Adhoc Relief All-2013	796.00
2199 Adhoc Relief Allow @10%	569.00	2316 Teaching Allowance 2021	3,224.00
2341 Dispr. Red All 15% 2022KP	6,208.00	2347 Adhoc Rel Al 15% 22(PS17)	6,209.00
2378 Adhoc Relief All 2023 35%	22,232.00	2393 Adhoc Relief All 2024 25%	16,375.00

Deductions - General

Wage type	Amount	Wage type	Amount
3015 GPF Subscription	-4,290.00	3501 Benevolent Fund	-1,200.00
3609 Income Tax	-5,142.00	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

Deductions - Income Tax

Payable: 82,260.00 Recovered till AUG-2024: 10,284.00 Exempted: 20564.20 Recoverable: 51,411.80

Gross Pay (Rs.): 129,033.00 Deductions: (Rs.): -11,367.00 Net Pay: (Rs.): 117,666.00

Payee Name: SHAHID SHUJA UZ ZAMAN

Account Number: 10024562960010

Bank Details: ALLIED BANK LIMITED, 250257 MAIN BRANCH MAIN BRANCH, MANSEHRA

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address: MANSEHRA

City: MANSEHRA

Temp. Address:

City:

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Email: sz219001@gmail.com

Alleged

DEPUTY SECRETARY (POLICE)  
(MAJIDAH LATIF)

*[Handwritten signature]*

The Registrar, Administration Department,  
The Section Officer (Admin), Administration Department,  
The Deputy Director (IT, E&A Department),  
The Deputy Director in Establishment & Administration Department with the request 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 Government, Khyber Pakhtunkhwa.
- 5. The Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
- 6. The Principal Commissioners in Khyber Pakhtunkhwa.
- 7. All Divisions of Attached Departments in Khyber Pakhtunkhwa.
- 8. All Heads of Autonomous Bodies in Khyber Pakhtunkhwa.
- 9. All Autonomous/Semi Autonomous Bodies in Khyber Pakhtunkhwa.
- 10. All Deputy Commissioners in Khyber Pakhtunkhwa.
- 11. The Registrar, Peshawar High Court, Peshawar.
- 12. The Registrar, Khyber Pakhtunkhwa Public Service Commission, Peshawar.
- 13. The Deputy Director (IT, E&A Department), Peshawar.
- 14. The Deputy Director in Establishment & Administration Department with the request to
- 15. The Section Officer (Admin), Administration Department, Peshawar.
- 16. The Registrar, Administration Department, Peshawar.
- 17. The Registrar, Administration Department, Peshawar.



CHIEF SECRETARY  
GOVERNMENT OF THE IGDER PAKHTUNKHWA

RECEIVED AND REPLY DATE

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

**AMENDMENT**

in exercise of the powers conferred by section 25 of the  
Khyber Pakhtunkhwa Civil Servants Act No. XVIII of  
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 amendments shall be made, namely:

Dated Peshawar the 06/08/2020

**NOTIFICATION**

GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT  
REGULATION WING

B 8

5

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 XVII) the chief Minister of Khyber Pakhtunkhwa is pleased to direct that in the Khyber Pakhtunkhwa Civil Servants (Appointment Promotion and Transfer) Rules 1989, the following further amendment shall be made, namely:

AMENDMENT

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

CHIEF SECRETARY  
GOVERNMENT OF THE KHYBER PAKHTUNKHWA

(ANDS): & EVEN DATE

Copy is forwarded to :-

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

(WARDAH LATIF  
DEPUTY SECRETARY (POLICY)

*Attested*  
*Office*

Attended  
Egbe

Section Officer (Policy)

Section Officer (Policy)

Yours faithfully,

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

Copy forwarded to them.

7/6  
7/6

Further, these 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.

3. Furthermore, these 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.

The basic rationale behind the debarment rule is aimed at preventing a civil servant from being promoted to a single lucrative post/position or to a post which would tend to force promotion to evade post/transfer or allow lack of capacity to reach higher responsibilities in case of promotion. Therefore, it is obligatory upon every civil servant to accept promotion in every condition.

2. The basic rationale behind the debarment rule is aimed at preventing a civil servant from being promoted to a single lucrative post/position or to a post which would tend to force promotion to evade post/transfer or allow lack of capacity to reach higher responsibilities in case of promotion. Therefore, it is obligatory upon every civil servant to accept promotion in every condition.

1. The Government of Khyber Pakhtunkhwa Civil Services (Appointment, Promotion and Transfer) Rules, 1987 stands deleted vide the departmental notification dated 06.08.2020. Thus, no provision exists to decline or forgo promotion.

Subject: **REPLYING TO THE MEMORANDUM DATED 18.04.2023 ON THE SUBJECT NOTED ABOVE AND TO STATE THE SUB-RULE (15) OF RULE-1 OF KHYBER PAKHTUNKHWA CIVIL SERVICES (APPOINTMENT, PROMOTION AND TRANSFER) RULES, 1987 STANDS DELETED VIDE THE DEPARTMENTAL NOTIFICATION DATED 06.08.2020. THUS, NO PROVISION EXISTS TO DECLINE OR FORGO PROMOTION.**

The Government of Khyber Pakhtunkhwa  
 Secretary & Secondary Education Department

GOVERNMENT OF KHYBER PAKHTUNKHWA  
 ESTABLISHMENT DEPARTMENT  
 No. SOP/Policy/HR/AD/1-2/2020  
 Dated: Islamabad the 06.08.2023



7/6

ANNEXURE

D  
(17)



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
CIVIL SECRETARIAT PESHAWAR  
(Phone No.091-0223587)

No.SO (Primary-M/E&SE)72-6/2023  
Dated Peshawar the June 25<sup>th</sup>, 2023

To,

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

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

*[Handwritten Signature]*  
26/6/23

Subject: GUIDANCE REGARDING DELETION OF RULE 7(5) IN THE KHYBER  
PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT, PROMOTION  
AND TRANSFER) RULES, 1988.

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&ADM-3/2020 dated  
06 June, 2023 and to state that the subject meeting is to be held on 06 July, 2023 at  
11:00 AM in this department under the Chairmanship of Additional Secretary (Estab)  
E&SE Department in his office.

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

Encl: AA

*[Handwritten mark]*

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

Copy forwarded to the:

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

*[Handwritten mark]*

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

Attested  
*[Handwritten Signature]*



12

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 a date, time & venue as mentioned above, please.

Encl: AA

(MURHAMMAD ISHAQ)  
SECTION OFFICER (PRIMARY MALE)

Copy forwarded to the:

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

SECTION OFFICER (PRIMARY MALE)

AH...  
A...

13

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.

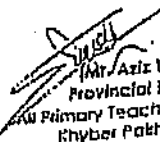
S#	NAME	DESIGNATION
1	Mr. Fazal Wahid	Deputy Director Establishment of Directorate Elementary & Secondary Education Department
2	Mr. Aziz Ullah	Provincial President All Primary Teachers Association Khyber Pakhtunkhwa
3	Mr. Razaqat Ullah	General Secretary APTA Peshawar
4	Muhammad Ishaq	Section Officer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


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

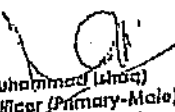
3. After thorough discussion it was decided that Directorate of Elementary & Secondary Education Department may examine the case properly and submit a self-contained/consolidated case for onward submission to Establishment Department for further necessary action.

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

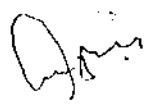
  
(Mr. Fazal Wahid)  
Deputy Director-  
E&SE Department

  
(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  


115

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

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

S/1	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 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 a self-contained/consolidated case for onward submission to Establishment Department for further necessary action.

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

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

\_\_\_\_\_

Provincial President  
All Primary Teachers Association  
Khyber Pakhtunkhwa

\_\_\_\_\_

(Mr. Razaqat Ullah)  
General Secretary APTA  
Peshawar

\_\_\_\_\_

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

\_\_\_\_\_

(Abdullah)

Additional Secretary (Establishment)

AAHestad  
Ajub

(15)

AMENDMENT

E



ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
CIVIL SECRETARIAT PESHAWAR  
(Phone No.091-8221587)

No. 50(Policy-M)E&SED/2-2/Appointment-Rule /2023  
Peshawar Dated 23<sup>rd</sup> August, 2023


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

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

Dear Sir,  
I am directed to refer to your letter No. 50(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.

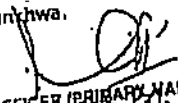
2. In this connection it is submitted that in some cases lady teacher of primary  
level who avail such promotions have to face serious inconvenience while they have to  
perform duties in the remotest station with no residential or transport facility. Most of  
them are married with kids and elder father or 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.

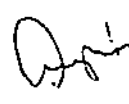
  
(MUHAMMAD ISHAQ)  
SECTION OFFICER (PRIMARY MALE)

Copy forwarded to the:

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

  
SECTION OFFICER (PRIMARY MALE)  
28/8/23

Scanned with CamScanner

Attested  


16

- B/c - - 2 -

No. So (Primary - M) E&SE D/A-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 (Primary) (Policy) / E&AD  
/1-3/2020 dated 3rd June 2023 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  
teachers 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  
Aas



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

AMR

F

(17)

Handwritten notes and signatures

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.

VERIFIED BY: AZIZULHAQ VS GOVT OF PK

Handwritten initials

18

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 23.09.2023 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)

Enlist 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)

Attest  
Official

18

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)

Attesting  
Official



- B/C -

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION, KPK

PESHAWAR  
(21-7-2023)

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

Subject: Minutes of Meeting

Dear Sir, I am directed to refer to letter No. (SO Primary-M) E&SED/S-1/6/Mtl/ Minutes of meeting/PST/2023 dated 10-7-2023 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. SOR-VI (E&AD) 1-3/2020 dated 06-08-2020.
- That this office sought guidance from your good office in the following words vide letter No. 6987 dated 06-07-2023
  - (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 action please.

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

Assistant Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa

A. Hestee  
D. J. J.

AHed-hcy  
 20

WP 1442-2023 AZULAM V3 DVVT CP P043

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

Assistant Director (Establish-1)  
 Elementary & Secondary Education  
 Khyber Pakhtunkhwa  
 21/11/2023

Copy of the above to:-  
 1. PA to Director  
 2. Master Copy

The circle is underlined for perusal and necessary actions please.

That your office forwarded the same to the quarter concerned vide letter No.50 (Prtm-4) E&SED/21/Appointment/2022 for necessary guidance. The Government of Khyber Pakhtunkhwa Establishment Department (Regulation) vide letter No.50 (Policy) EAAD/1-17020 dated 06-06-2023 categorically stated that there shall be 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.50 (Prtm-4) E&SED/21/Appointment/2022 dated 12-06-2023. That, in the light of the minutes of meeting dated 6-07-2023 held under the Chairmanship of Hon. Additional Secretary, Establishment at his office this office has been asked for resolution of consolidated case. In view of the above, this office is of considered opinion that the deletion of Rules 7(5) have effected negatively a large number of female teachers. Thus it is proposed that Teachers' Union may be exempted of implications of the amendment in the rules laid provided they submit their written refusal prior to conclusion of the meeting of Departmental Promotion Committee.

G.M/Ministry of the Meeting/572023 dated 10-07-2023 on the subject cited above and to present brief history about the background of the case as under:

**MINUTES OF THE MEETING**

Subject - Khyber Pakhtunkhwa Establishment Department  
 The Assistant Officer (Primary-Male)



No. 8145  
 R.No. 2157/MC/General Cases  
 Dated: 21-11-2023  
 Email: estab@kpk.gov.pk  
 Phone: 09-9232344

20

KPK: تہذیبی اہلیت  
KPK: تہذیبی اہلیت  
KPK: تہذیبی اہلیت

تہذیبی اہلیت  
KPK: تہذیبی اہلیت

1- تہذیبی اہلیت کے معنی ہیں جو کہ تہذیبی اہلیت کے معنی ہیں۔  
2- تہذیبی اہلیت کے معنی ہیں جو کہ تہذیبی اہلیت کے معنی ہیں۔  
3- تہذیبی اہلیت کے معنی ہیں جو کہ تہذیبی اہلیت کے معنی ہیں۔  
4- تہذیبی اہلیت کے معنی ہیں جو کہ تہذیبی اہلیت کے معنی ہیں۔  
5- تہذیبی اہلیت کے معنی ہیں جو کہ تہذیبی اہلیت کے معنی ہیں۔  
6- تہذیبی اہلیت کے معنی ہیں جو کہ تہذیبی اہلیت کے معنی ہیں۔  
7- تہذیبی اہلیت کے معنی ہیں جو کہ تہذیبی اہلیت کے معنی ہیں۔  
8- تہذیبی اہلیت کے معنی ہیں جو کہ تہذیبی اہلیت کے معنی ہیں۔  
9- تہذیبی اہلیت کے معنی ہیں جو کہ تہذیبی اہلیت کے معنی ہیں۔  
10- تہذیبی اہلیت کے معنی ہیں جو کہ تہذیبی اہلیت کے معنی ہیں۔

تہذیبی اہلیت

21

AMNEMORE

تہذیبی اہلیت کے معنی ہیں جو کہ تہذیبی اہلیت کے معنی ہیں۔

Khyber Pakhtunkhwa

Aziz Ullah Khan  
President  
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0333-041673@gmail.com  
77 npinkab



AFTA House  
Govt. Primary School No.4,  
Gubnor Peshawar City.

آل پرائمری ٹیچرز ایسوسی ایشن (ایٹا) خیبر پختونخوا

Annexure - A

(22)

مقام: میگزین پبلشرز ڈپارٹمنٹ، ایٹا، خیبر پختونخوا  
تاریخ: 22/07/2023

گزارش ہے کہ پروٹیکشن آف ایڈیٹرز ایکٹ 1962ء کی سیکشن 10(1) کے تحت ایڈیٹرز اور پبلشرز کے درمیان ایک سال کی مدت کے لئے ایک رجسٹریشن کا اہلکار ہونا ضروری ہے۔ ایڈیٹرز اور پبلشرز کے درمیان ایک سال کی مدت کے لئے ایک رجسٹریشن کا اہلکار ہونا ضروری ہے۔ ایڈیٹرز اور پبلشرز کے درمیان ایک سال کی مدت کے لئے ایک رجسٹریشن کا اہلکار ہونا ضروری ہے۔

مقامی حالات میں ایڈیٹرز اور پبلشرز کے درمیان ایک سال کی مدت کے لئے ایک رجسٹریشن کا اہلکار ہونا ضروری ہے۔ ایڈیٹرز اور پبلشرز کے درمیان ایک سال کی مدت کے لئے ایک رجسٹریشن کا اہلکار ہونا ضروری ہے۔ ایڈیٹرز اور پبلشرز کے درمیان ایک سال کی مدت کے لئے ایک رجسٹریشن کا اہلکار ہونا ضروری ہے۔

ایڈیٹرز اور پبلشرز کے درمیان ایک سال کی مدت کے لئے ایک رجسٹریشن کا اہلکار ہونا ضروری ہے۔ ایڈیٹرز اور پبلشرز کے درمیان ایک سال کی مدت کے لئے ایک رجسٹریشن کا اہلکار ہونا ضروری ہے۔ ایڈیٹرز اور پبلشرز کے درمیان ایک سال کی مدت کے لئے ایک رجسٹریشن کا اہلکار ہونا ضروری ہے۔

ایڈیٹرز اور پبلشرز کے درمیان ایک سال کی مدت کے لئے ایک رجسٹریشن کا اہلکار ہونا ضروری ہے۔ ایڈیٹرز اور پبلشرز کے درمیان ایک سال کی مدت کے لئے ایک رجسٹریشن کا اہلکار ہونا ضروری ہے۔ ایڈیٹرز اور پبلشرز کے درمیان ایک سال کی مدت کے لئے ایک رجسٹریشن کا اہلکار ہونا ضروری ہے۔

ایڈیٹرز اور پبلشرز کے درمیان ایک سال کی مدت کے لئے ایک رجسٹریشن کا اہلکار ہونا ضروری ہے۔ ایڈیٹرز اور پبلشرز کے درمیان ایک سال کی مدت کے لئے ایک رجسٹریشن کا اہلکار ہونا ضروری ہے۔ ایڈیٹرز اور پبلشرز کے درمیان ایک سال کی مدت کے لئے ایک رجسٹریشن کا اہلکار ہونا ضروری ہے۔

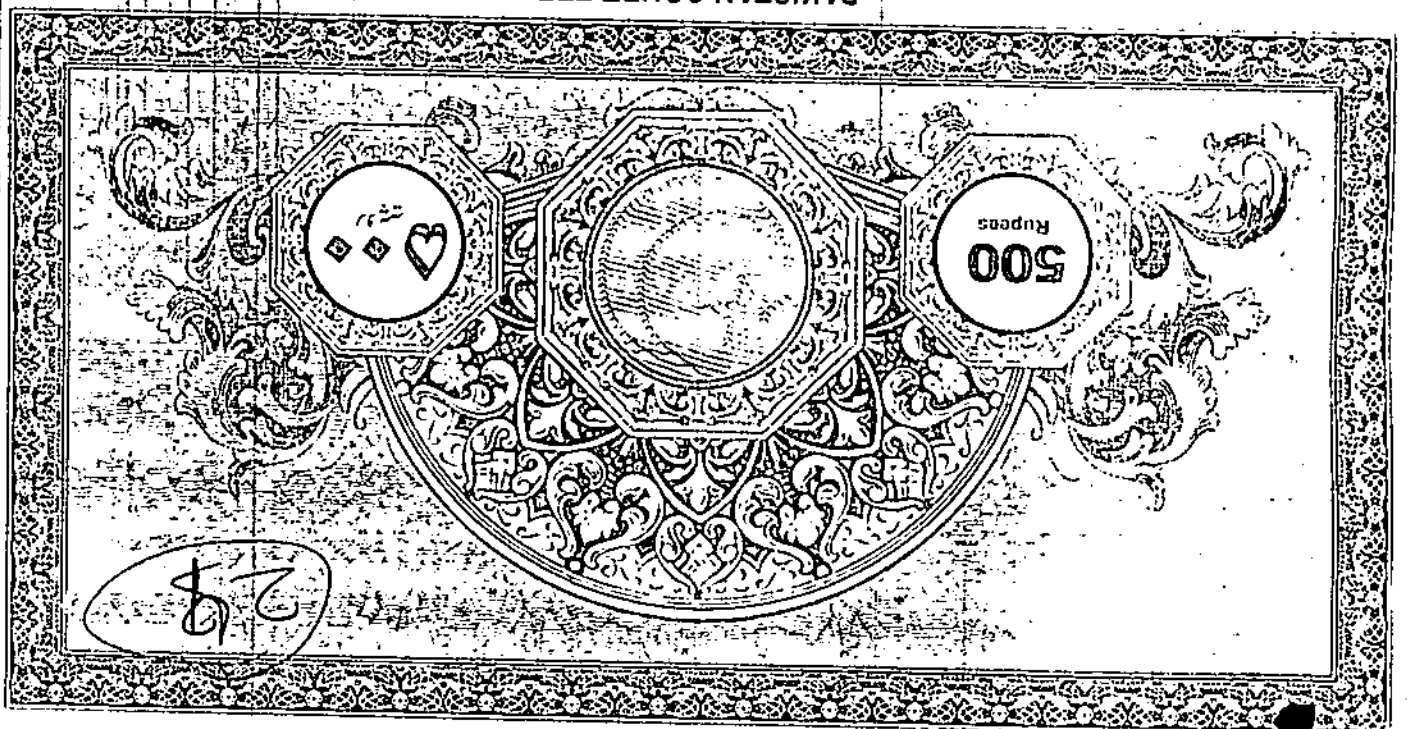
ایڈیٹرز اور پبلشرز کے درمیان ایک سال کی مدت کے لئے ایک رجسٹریشن کا اہلکار ہونا ضروری ہے۔ ایڈیٹرز اور پبلشرز کے درمیان ایک سال کی مدت کے لئے ایک رجسٹریشن کا اہلکار ہونا ضروری ہے۔ ایڈیٹرز اور پبلشرز کے درمیان ایک سال کی مدت کے لئے ایک رجسٹریشن کا اہلکار ہونا ضروری ہے۔

عمران علی سہیل مدد  
آل پرائمری ٹیچرز ایسوسی ایشن خیبر پختونخوا  
22/07/23

ACCEPTED

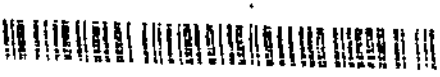
N.SL No	O.SL No	Name of Present School	Name	Father's Name	BPS	Acad	Div	Prof	D.O.B	Date of Promotion	D/Appt	TO charge
337	1632	GPS KOTLI PREEN	SHOUKAT ALI KHAN	ABBAS KHAN	15	BA		PTC/B.ED	25/05/1973	23-Feb-15	14/11/1994	14/11/1994
338	1633	GPS PARIAN	MUHAMMAD NAHEEM	MUHAMMAD IQBAL	15	FA		PTC	04/06/1973	23-Feb-15	14/11/1994	14/11/1994
339	1634	GPS HAJI ABAD	ARSHAD MAHMOOD	MUHAMMAD ALAM	15	MA	2nd	PTC/CT/B.ed/M.ed	01/02/1974	23-Feb-15	14/11/1994	14/11/1994
340	1635	GPS CHINYANI	MUHAMMAD FAYAZ	MUHAMMAD NAWAZ	15	FA		PTC	04/02/1974	23-Feb-15	14/11/1994	14/11/1994
341	1636	GPS SERI MEHAR SUL	ATTIQ UR REHMAN	QAZI MAJBOOL UR REHMAN	15	MA	2nd	PTC/M.ed	15/03/1974	23-Feb-15	14/11/1994	14/11/1994
342	1638	GPS ROTAR NARA	MUHAMMAD SHAKIL	MUHAMMAD TULLIAN	15	FA		PTC	15/04/1974	23-Feb-15	14/11/1994	14/11/1994
343	1639	GPS LAB	SYED MALANG SHAH	SYED AKBAR SHAH	15	BA		PTC/B.ED	25/01/1975	23-Feb-15	14/11/1994	14/11/1994
344	1640	GPS SARWAI	MUNIR AHMAD	ABDUR RASHID	15	MA	2nd	PTC/CT/B.ed/M.ed	01/02/1975	23-Feb-15	14/11/1994	14/11/1994
345	1445	GPS SINJALYALLA	MUHAMMAD SHAFIQUE	MUHAMMAD AYUB	15	BA		PTC	20/02/1967	23-Feb-15	07/09/1993	05/12/1990
346	1449	GPS ANDRASI	FIDA MOHAMD	MUHAMMAD MISKEEN	15	BA	2nd	PTC/CT	10/02/1970	23-Feb-15	07/09/1993	01/01/1990
347	1453	GPS KHUDDIAN	IMDAD HUSSAIN	FAZIL HUSSAIN	15	BA		PTC	13/03/1971	23-Feb-15	20/10/1993	20/10/1993
348	1513	GPS SHAYAN NO 2	SHABER AHMAD	NAYAB KHAN	15	FA		PTC	23/03/1967	23-Feb-15	25/12/1993	21/03/1993
349	1518	GPS E SHARI	MUHAMMAD MITHAZ	RAJUL PERMAN	15	MA	2nd	PTC/CT/B.ed	12/02/1971	23-Feb-15	10/11/1994	10/11/1994
350	350	GPS KULHARY	MUHAMMAD AHMAD	CHAU SLAM	15	FA		PTC/CT	14/04/1969	19-Nov-15	3/25/1989	11/23/1983
351	1521	GPS G-GRAY PHAIR	MUHAMMAD SADIQ	MASOOD UR REHMAN	15	BA		PTC	18-07-68	19-Nov-15	25-12-93	15-10-89
352	1594	GPS SJAL	MUHAMMAD RAFIQUE	MUHAMMAD SHARIF	15	FA		PTC	05/02/1971	19-Nov-15	29/05/1994	09/10/1989
353	1642	GPS PANO DHERI	SHAHID SHUJA UZ ZAMAN	SHER MUHAMMAD	15	MA		PTC/CT/B.ed/M.ed	01/06/1975	19-Nov-15	14/11/1994	14/11/1994
354	1643	GPS TANDHA	MUHAMMAD RIAZ	ABDUR RAZZAQ	15	FA		PTC	12/06/1975	19-Nov-15	14/11/1994	14/11/1994
355	1644	GPS BAT SANGRA	MUHAMMAD IRFAN	MIR ZAMAN	15	MA		PTC/M.ed	13/08/1967	19-Nov-15	15/11/1994	15/11/1994
356	1645	GPS BANDA TATAR	TANJUM SAEED	SAEED UR REHMAN	15	BA		PTC	20/04/1970	19-Nov-15	15/11/1994	15/11/1994
357	1647	GPS BANDA BALOLA	MUHAMMAD MUSHTAQ	GHULAM SARWAR KHAN	15	BA	2nd	PTC/CT/B.Ed	09/12/1970	19-Nov-15	15/11/1994	15/11/1994
358	1648	GPS KULHARY WEST	SHAKIR ULLAH	SHAFI ULLAH	15	BA		PTC/B.ed	20/06/1972	19-Nov-15	15/11/1994	15/11/1994
359	1650	GPS BELA ZIARAT	S.NADEEM HUSSAIN SHAH	ZAFAR ALI SHAH	15	BA		PTC	26/02/1974	19-Nov-15	15/11/1994	15/11/1994
360	1651	GPS DHODIAL	MUHAMMAD SHAKEEL	GHULAM FAREED	15	FA		PTC/CT	02/04/1975	19-Nov-15	15/11/1994	15/11/1994
361	1653	GPS BATTORA	ISHFAQ HUSSAIN SHAH	SYED ALI MASOHER SHAH	15	FA		PTC	25/02/1973	19-Nov-15	16/11/1994	16/11/1994
362	1654	GPS HADO BANDI	JAQAT HUSSAIN SHAH	GHADJI SHAH	15	MA	2nd	PTC/CT/B.ed/M.ed	03/04/1968	19-Nov-15	17/11/1994	17/11/1994
363	1656	GPS KANGAR BANDA	SHAH NAWAZ	DOLET KHAN	15	BA		PTC	05/03/1973	19-Nov-15	19/11/1994	19/11/1994

PAKISTAN COURT FEE



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Rupees

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DBAM No. 338

BC No. 10 - 24 57

Name of Advocate طاہر ساجد

S.No

52230

24

Fee Rs. 200/-



2024-25  
GENERAL SECRETARY  
District Bar Association  
Manshera

# وکالت نامہ

بعدالت: سروس ٹریبیونل لیسٹاؤر  
عنوان: شاہد بنام: سیکرٹری گورنمنٹ پک  
منجاب: اسپلٹ نوعیت مقدمہ: سروس اسپلٹ

باعث تحریر آنکہ

دریں مقدمہ عنوان بالا میں اپنی طرف سے برائے پیروی و جواب دی بمقام اسپلٹ اسپلٹ کے لئے  
طاہر ساجد ایڈووکیٹ کورم  
کو بدیں شرائط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا رہوں گا اور بوقت پکارے  
جانے وکیل موصوف کو اطلاع دیکر حاضر کروں گا۔ اگر کسی پیشی پر منظر حاضر نہ ہوا اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ  
میرے خلاف ہو گیا تو وکیل موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل موصوف صدر مقام پکھری کے علاوہ  
کسی اور جگہ پکھری کے مقررہ اوقات سے پہلے یا بروز تعطیل پیروی کرنے کے مجاز نہ ہوں گے۔ اگر مقدمہ پکھری کے علاوہ  
کسی اور جگہ سماعت ہوا یا پکھری کے اوقات کے آگے پیچھے سماعت ہونے پر منظر کو کوئی نقصان پہنچے تو وکیل موصوف ذمہ دار  
نہ ہوں گے اور وکیل موصوف کو عرضی دعویٰ اور درخواست اجراء ڈگری و نظر گمانی اپیل و گمانی دائر کرنے نیز ہر قسم کی درخواست  
بیان حلفی و تصدیق کرنے اور اسپر دستخط کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کے اجراء کرانے اور قسم کاروبہ وصول  
کرنے اور رسید دینے اور داخل کرنے کا ہر قسم کا بیان دینے اور سپر دستاویں و راضی نامہ و دستبرداری و اقبال دعویٰ کا اختیار بھی ہوگا  
بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری کی طرف درخواست حکم امتناعی یا فیصلہ قبل از ڈگری اجراء ڈگری بھی وکیل موصوف  
کر بشرط ادائیگی علیحدہ مختار ادا کرنے کا مجاز ہوگا اور بصورت ضرورت بدوراں مقدمہ یا اپیل و گمانی کسی دوسرے وکیل یا بیرٹرو کو  
بجائے خود یا اپنے ہمراہ مقرر کریں اور مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے وکیل موصوف کو  
اور اگر پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو وکیل موصوف کو پورا اختیار ہوگا کہ مقدمہ کی پیروی نہ کریں اور ایسی حالت  
میں میرا مطالبہ وکیل موصوف کے برخلاف نہیں ہوگا مجھے کل ساختہ پرداخت وکیل موصوف مثل ذات خود منظور و قبول ہوگا۔  
لہذا وکالت نامہ لکھ دیا ہے اور دستخط/انگوٹھا ثبت کر دیا ہے تاکہ سند رہے۔ مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے۔

مورخہ 19 اکتوبر 2024ء

ACCEPTED

شاہد سروس ٹریبیونل لیسٹاؤر  
03005618026