


# FORM OF ORDER SHEET

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

**Appeal No.** 2035/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	21/10/2024	<p>The appeal of Mr. Abdur Raheem 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>

**BEFORE THE SERVICE TRIBUNAL**

**KHYBER PAKHTUNKHWA**

**A. No. 2035/2024**

Abdur Raheem.....Appellant

Versus

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

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**Dated: 21.10.2024**



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

**Service Appeal No. 2035 /2024**

Abdur Raheem son of Muhammad Yaqgob PHST BPS-15  
at GPS Dala Circle Shahelia, Manshura D.O.A  
20.11.1988.....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.  
(Copies of first appointment letter  
and monthly salary account are  
annexed as Annexure "A")

- 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.

(Copies of representation against the said notification, representation made by APTA President and Seniority List are annexed as Annexure "G, H & I")

- 11) That, feeling aggrieved from the letters dated 06.06.2023, 07.09.2023 and notification of DEO Mansehra Endst No. 8152-53 dated 25.09.2024 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.

(4)

**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.

**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 and 25.09.2024 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.

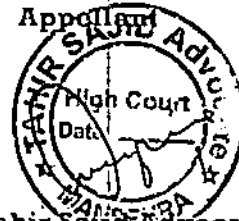
It is, further, prayed that no penal action as proposed and envisaged in letters dated 06.06.2023 and 25.09.2024 may be declared as unlawful, illegal and without having any legal effect.

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

Dated: 21.10.2024

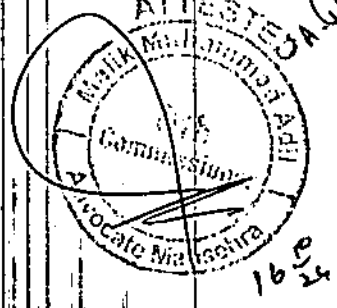
*A. Q. Ali*

Through: -



Tahir Sajid Advocate  
High Court, District  
Courts, Manshehra

**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.



**BEFORE THE SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA**

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

Abdur Raheem.....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  
LETTERS DATED 06.06.2023 AND 25.09.2024 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 letters dated 06.06.2023, 25.09.2024 is not suspended the appellant would suffer irreparable loss.
- 4) That, valuable right of the appellant is involved in this case.

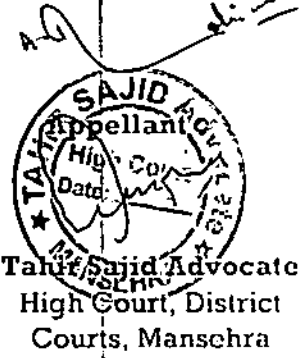
In view of the reason, it is humbly requested that the notification bearing No. SO(POLICY)E&AD/1-3/2020 dated 06.08.2020, communicated to respondent No. 2 by respondent No. 1, vide letters dated 06.06.2020 and 25.09:2024 may kindly be suspended till the final disposal of the main appeal in hand.

**Dated: 21.10.2024**



**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 therefrom from this Honorable Tribunal.

Through: -



Tahf Sajid Advocate  
High Court, District  
Courts, Manshera





O.O.No. 149  
Dated, 20/11/1988.

ANN: A

The following PTO trainees of Mansehra Tehsil are hereby appointed against vacant/Newly sanctioned PTC posts in BPS-7(Rs. 750/-PM fixed) plus usual allowances as admissible to them under the rules with effect from the date of taking over charge in the interest of public service.

S.No., Name, Father's name & address, School where appointed, Remarks.

1. Anwar Zeb S/O Kent Zaman R/O Mandaguncha.
2. Saif Mohd S/O Khalid Khan R/O Baifa Mera.
3. Mear Ahmad S/O Mohd Yousof R/O Muradpur.
4. Mohd Sabir S/O Khan Zaman R/O Mera Amjad Ali.
5. Mohd Miskeen S/O Mir Zaman R/O Laseen Nawab.
6. Mohd Pervez S/O Mohd Akbar R/O Baifa.
7. Iqbal Hussain Shah S/O Noor Ahmad Shah R/O Dhayal.
8. Mohd Saied S/O Abdur Rehman R/O Baifa.
9. Ghulam Khan S/O Hajit Khan R/O Baifa Khudad.
10. Mohd Pervez S/O Mohd Maroof R/O Fakir Mera.
11. Akbar Hussain S/O Abbas Salim R/O Pano Dhert.
12. Mohd Saied Ahmad S/O Abdul Latif R/O Sert Gorta.
13. S. Qurban Shah S/O S. Mehraban R/O Khawar.
14. Mohd Ayaz S/O Mohd Yousof Khan R/O Baifa.
15. Iftikhar Ahmad S/O Nazirul-Haq R/O Trappi.
16. Nazibullah S/O Khurshid Khan R/O Baifa.
17. Mohd Miskeen S/O Khonzaman R/O Laseen Nawab.
18. Anwar Gul S/O Allah Dad R/O Jakkot.
19. Mohd Mubhal S/O Mohd Daud R/O Baifa Mera.
20. Rizvi Hussain Shah S/O Abdur Razed Shah R/O Bandi Sedig.

Mscg: School Bekki - Agent: newly created post.  
Mscg: School Baifa - Dhora.  
Mscg: School Konger - Mera, U/C Mallkpur.  
Mscg: School Bhattan - U/C Aterahtha.  
Mscg: School Kotla - Darwaza U/C Phura.  
Mscg: School Baigh - U/C Aterahtha.  
Mscg: School Jabri Bilwong - U/C Sup.  
Mscg: School Thatt - Kalam U/C Farina.  
Mscg: School Khan - Dhert U/C Shinkari.  
Mscg: School Butti - U/C Shergarh.  
Mscg: School Jhangam N - U/C Sherkund.  
Mscg: School Gada - Bahla U/C Darband.  
Mscg: School Muhammad - U/C Aterahtha.  
Mscg: School Horori - U/C Aterahtha.  
Mscg: School Phogore - U/C Dhungli.  
Mscg: School Kandi U/C - Kothi.  
Mscg: School Chokli - Mung: School Chaitan - Haryalia U/C Salabat.  
Mscg: School Inayat - Mung: School Inayat - Abad.  
Mscg: School Razer - Gul R/O Orhi.

21. Alam Gfr: S/O Mohd Jehangir R/O Msq: School Shady Arg: Vacant/ newly/ created po AB U/c Dhodlat.

Msq: School Kolthe U/c Sum.

Msq: School Landl U/c Attershaha.

Msq: School Doga U/c Salyat.

Msq: School Kot- Beltan U/c Beltan.

Msq: School Buz- Bala U/c Jabborl.

Msq: School Raiti U/c Jabborl.

Msq: School Phag Bando- U/c Beltan.

Msq: School Ssai- Kotha U/c Bherkund.

Msq: School Phag- Uta U/c Kagan.

Msq: School Puxana- Dhogaromg.

Msq: School Sajin- Handl U/c Bhogaromg.

Msq: School Gut- Serl U/c Sh: Maz: Kham.

Msq: School Jal- U/c Doga.

Msq: School Naka- Cher U/c Hiko.

Msq: School Shingal- Dert U/c G.H. Ullah.

Msq: School Gwendlo- Kala Dhaka.

Msq: School Ggant- Kala Dhaka.

Msq: School Bat Karar U/c- Kala Dhaka.

Msq: School Doba- Msq: School Doba- Baka Kala Dhaka.

Msq: School Sankal- Agf: newly/ Poen U/c Balokot. created post.

MSQ: Nall, Jabbar, Vice Warrs PFC

MSQ: School Sankal- Agf: newly/ Poen U/c Balokot. created post.

GPS Sert Melolien Vice Mr. Banaroo

GPS Nall, Jabbar, Vice Warrs PFC

MSQ: School Sankal- Agf: newly/ Poen U/c Balokot. created post.

MSQ: School Doba- Baka Kala Dhaka.

GPS Kalgan Vice Gulam Sarwar PFC

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22. Mohd Valt S/O Noor Dad R/O Dhodlat.

23. Mohd Rafiq S/O Abdur Rahim R/O Behal.

24. Rida Mohd S/O Sher Mohd R/O Bendi Tiblat.

25. Shekil Ahmad S/O Mohd Farid R/O Gidderpur.

26. Shahzad Qadir Faroon S/O Mond Urtan R/O Garsoha.

27. Alamzeb S/O Mohd Younis R/O Garsoha.

28. Mohd Saqad S/O Gul Mohd R/O Laagan Newab.

29. Abur Rahim S/O Mohd Yaqub R/O Doga.

30. Mohd Riaz S/O Mahmood Khan R/O Kalen(Rattan Dabh).

31. Mohd Younis S/O Mir Zaman R/O Doga.

32. Mohd Inayatullah S/O Mohd - Hussain R/O Dime(Dharel).

33. Gul Zaman S/O Mohd Yaqub R/O Suphal Nafik Khan.

34. Alim Zeb S/O Malik Aman R/O Shergah.

35. Mohd Sajed S/O Abdul Malik R/O Doga.

36. Mohibur Rehman S/O Khalilur Rehman R/O Doga.

37. Mohd Muhtaq S/O Mohd Zaman R/O Thatt Khurd.

38. Mohd Mowaz S/O Mohd Sherif R/O Gullbagn.

39. Mohd Arit S/O Mohd Miskeen R/O Doga.

40. Mushtaq Ahmed S/O Zairi Hujum R/O Doga.

41. Mohd Sadiqar S/O Mohd Aktem R/O Hattiz Bendi.

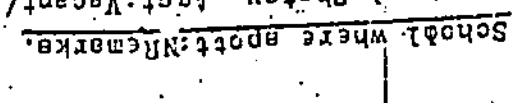
42. Mohd Sabir S/O Mohd Daud Khan R/O Maitikpur.

43. Mohd Siddique S/O Kurnahal- Khan R/O Kutharey.

44. Sajed Ahmad S/O Ali Zaman R/O Shergah.

45. Aar Mohd Khan S/O Taj Kchd Khan R/O Eldgan.

46. Mohd Sajed B/O Mohd Younis R/O Menehra.



S.No. Name, father's name & residence. School where appt: Remark.

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Msq: School Phag- Uta U/c Kagan.

Msq: School Puxana- Dhogaromg.

Msq: School Sajin- Handl U/c Bhogaromg.

Msq: School Gut- Serl U/c Sh: Maz: Kham.

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Msq: School Gwendlo- Kala Dhaka.

Msq: School Ggant- Kala Dhaka.

Msq: School Bat Karar U/c- Kala Dhaka.

Msq: School Doba- Msq: School Doba- Baka Kala Dhaka.

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23. Mohd Rafiq S/O Abdur Rahim R/O Behal.

24. Rida Mohd S/O Sher Mohd R/O Bendi Tiblat.

25. Shekil Ahmad S/O Mohd Farid R/O Gidderpur.

26. Shahzad Qadir Faroon S/O Mond Urtan R/O Garsoha.

27. Alamzeb S/O Mohd Younis R/O Garsoha.

28. Mohd Saqad S/O Gul Mohd R/O Laagan Newab.

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32. Mohd Inayatullah S/O Mohd - Hussain R/O Dime(Dharel).

33. Gul Zaman S/O Mohd Yaqub R/O Suphal Nafik Khan.

34. Alim Zeb S/O Malik Aman R/O Shergah.

35. Mohd Sajed S/O Abdul Malik R/O Doga.

36. Mohibur Rehman S/O Khalilur Rehman R/O Doga.

37. Mohd Muhtaq S/O Mohd Zaman R/O Thatt Khurd.

38. Mohd Mowaz S/O Mohd Sherif R/O Gullbagn.

39. Mohd Arit S/O Mohd Miskeen R/O Doga.

40. Mushtaq Ahmed S/O Zairi Hujum R/O Doga.

41. Mohd Sadiqar S/O Mohd Aktem R/O Hattiz Bendi.

42. Mohd Sabir S/O Mohd Daud Khan R/O Maitikpur.

43. Mohd Siddique S/O Kurnahal- Khan R/O Kutharey.

44. Sajed Ahmad S/O Ali Zaman R/O Shergah.

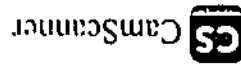
45. Aar Mohd Khan S/O Taj Kchd Khan R/O Eldgan.

46. Mohd Sajed B/O Mohd Younis R/O Menehra.

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Handwritten signature and markings.

Handwritten signature and markings.



S.No.	Name, fathers name & residence.	School where apptt.	Remarks.
47.	Mohd Shemraz S/O Abdur Rehman R/O Phulra.	Mosq: School Jabri- Sheshal U/C Jared.	Agst: newly/ created post.
48.	Mr. Sakhawat S/O Mohd Akbar R/O Haryala.	Mosq: School Hedo- Bandi U/C Attershisha.	---do---
49.	Ajmal Muntez S/O Muntez Khan R/O Malikpur.	Mosq: School Dhandan U/C Jared.	---do---
50.	Mohd Zubair S/O Ghulam Hussein R/O Bela (Gandian).	Mosq: School Jamal Mera U/C Kaghan.	-do--
51.	Niaz Mohd S/O Mohabit Khan R/O Trangri Bala.	Mosq: School Qazi- Abad U/C Bherkund.	---do---
52.	Tayyabur Rehman S/O Abdul Qayyum R/O Battal.	GMS Bandi Shungli	Agst: V/post.
53.	Zulfiqar Ahmad S/O Roshan Din R/O Mansehra.	Mosq: School Hunger U/C Oghi.	Agst: Newly created post.

- Note:-
1. Charge report should be submitted to all concerned.
  2. No TA/DA etc are allowed to any one.
  3. Their original certificates may be checked before handing over charge.
  4. They should not be handed over charge if their age are below 18 years and 25 years.
  5. They should produce their xxx age and health certificate from Medical Supdt: DMQ Hospital Mansehra.
  6. The appointment is made according to the terms and condition laid down under the rules.
  7. The appointment is purely temporary and liable to be termination at any time without any reasons.
  8. All candidates/PTC trainees from S.No.1 to 53 are failed and allowed to draw their pay in BPS-7 (Rs. 750/- PM fixed) plus usual allowance as admissible to them under the rules.

*Handwritten signature*  
20/11/88

(KHURSHID AHMAD)  
DISTRICT EDUCATION OFFICER  
(MALE) MANSEHRA.

Endst: No. 18607-717/AE-III/Apptt: PTC Dated. 20/11/1988.

Copy of the above is forwarded to the:-

1. Sub Divisional Edu: Officer (Male) Mansehra .
2. A.S.D.F.O concerned circle.
3. Headmasters/Headteachers of Govt: Middle/Primary/Mosque Schools.
4. Candidates concerned.
5. O.D. File.

*Handwritten signature*  
20/11/88

DISTRICT EDUCATION OFFICER  
(MALE) MANSEHRA.



Dist. Govt. KP-Provincial  
District Accounts Office Mansehra  
Monthly Salary Statement (July-2023)



Personal Information of Mr ABDUR RAHIM d/w/s of MUHAMMAD YAQOUB

Personnel Number: 00222038

CNIC: 1350306089959

NTN:

Date of Birth: 21.01.1970

Entry into Govt. Service: 24.11.1988

Length of Service: 34 Years 08 Months 09 Days

Employment Category: Active Temporary

Designation: PRIMARY SCHOOL HEAD TEACH

SD003206-DISTRICT GOVERNMENT KHYBE

DDO Code: MA6145-Mansehra

Payroll Section: 001

GPF Section: 001

Cash Center: 1

GPF A/C No: IV EDU MAN

GPF Interest applied

GPF Balance:

606,147.00 (provisional)

Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2022

Pay Scale Type: Civil BPS: 15

Pay Stage: 23

Wage type	Amount	Wage type	Amount
0001 Basic Pay	69,460.00	1001 House Rent Allowance 45%	3,524.00
1210 Convey Allowance 2005	2,856.00	1300 Medical Allowance	1,500.00
2148 15% Adhoc Relief All-2013	950.00	2199 Adhoc Relief All @ 10%	637.00
2316 Teaching Allowance 2021	3,224.00	2341 Dispr. Red All 15% 2022KP	6,807.00
2347 Adhoc Rel At 15% 22(PS17)	6,807.00	2378 Adhoc Relief All 2023 35%	24,311.00

Deductions - General

Wage type	Amount	Wage type	Amount
3015 GPF Subscription	-1,290.00	3501 Benevolent Fund	-1,200.00
3029 Income Tax	-2,820.00	3900 Emp.Fdu. Fund KPK	-135.00
3033 R. Benefits & Death Comp.	-600.00		0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	700,000.00	-20,000.00	680,000.00

Deductions - Income Tax

Payable: 45,113.88 Recovered till JUL-2023: 2,820.00 Exempted: 11278.06 Recoverable: 31,015.82

Gross Pay (Rs.): 120,076.00 Deductions: (Rs.): -29,045.00 Net Pay: (Rs.): 91,031.00

Payee Name: ABDUR RAHIM

Account Number: PLS 1125-5

Bank Details: THE BANK OF KHYBER, 080017 MANSEHRA BRANCH MANSEHRA BRANCH, MANSEHRA

Leaves: Opening Balance: Availed: Earned: Balance

Permanent Address: MANSEHRA

City: MANSEHRA

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email: abdurrahimgpsdata@gmail.com

System generated document in accordance with APPM 4.6.12.9(50399805/26.07.2023)01.01

\* All amounts are in Pak Rupees

\* Errors & omissions excepted (SERVICES/1.07.2023/15-38/45)





DEPUTY SECRETARY (POLICE)  
(VA) (LAWYER)

*[Handwritten signature]*

4/11/2020

The Secretary, Government of Khyber Pakhtunkhwa, Planning & Development Department, Peshawar, is requested to issue the following orders in the Gazette of the Government of Khyber Pakhtunkhwa, Peshawar, under the provisions of the Government of Khyber Pakhtunkhwa, Planning & Development Department, Peshawar, Rules, 1989, in the following terms:

CHIEF SECRETARY, GOVERNMENT OF THE KHAYBER PAKHTUNKHWA

in rule 2, sub-rule (5) shall be deleted.

APPOINTMENT

in exercise of the powers conferred by section 25 of the Government of Khyber Pakhtunkhwa, Planning & Development Department, Peshawar, Rules, 1989, the following appointments shall be made, namely:

NOTIFICATION

GOVERNMENT OF THE KHAYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT  
REGULATION NO. 11

ANN: "B"

(10)

GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT  
(REGULATION WING)

NOTIFICATION

Dated Peshawar the, 06/08/2020

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

AMENDMENT

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

CHIEF SECRETARY  
GOVERNMENT OF THE KHYBER PAKHTUNKHWA

(ANDS): & EVEN DATE

Copy is forwarded to :-

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

(WAKDAH LATIF  
DEPUTY SECRETARY (POLICY)





GOVERNMENT OF KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT  
No. SO(Polcy)/G&AD/1-3/2020  
Dated Peshawar the June 06, 2023

62

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

Subject: GUIDANCE REGARDING DELATION OF BIDDING IN THE  
KHYBER PAKHTUNKHWA CIVIL EMPLOYMENT APPOINTMENT,  
PROMOTION AND TRANSFER RULES, 1989.

Dear Sir,  
I am directed to refer to your letter No. SO(Polmy-MY/18-30022-  
2/Appointment/2023) dated 18.04.2023 on the subject noted above and to state that sub-rule  
(1) of Rule-7 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer)  
Rules, 1989 stands deleted vide this departmental notification dated 06.06.2020; thus, no  
provision exists to decline or forgo promotion.

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

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

Yours faithfully,

(Signature)  
(Deputy Secretary (Polcy)  
Establishment Deptt)

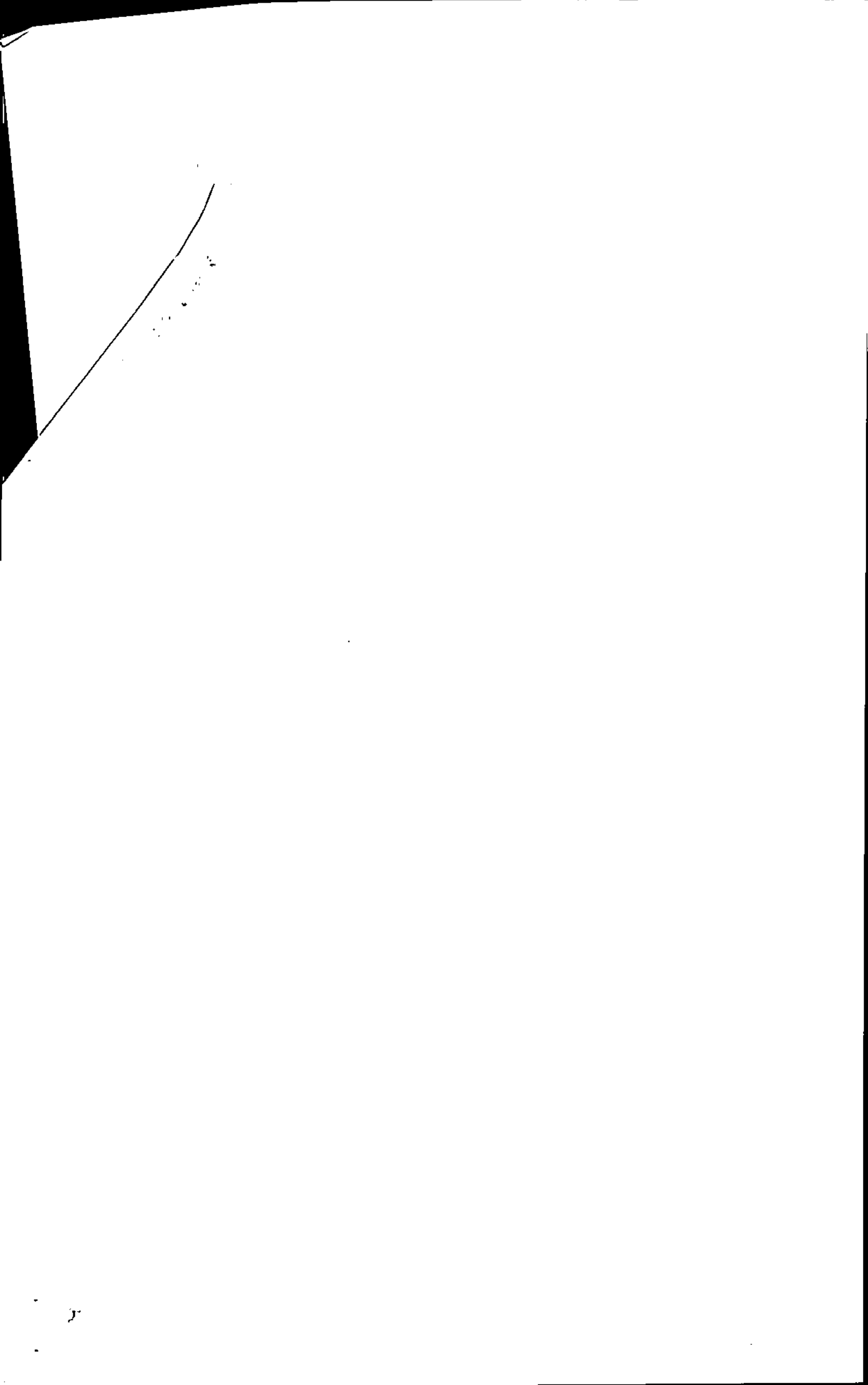
(Signature)  
Encl. Of copy No & title

Copy forwarded to:-

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

(Signature)  
Deputy Officer (Polcy)







12

Better copy page No.....

GOVERNMENT OF KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT

No.SO(Policy)E&AD/1-3/2020  
Dated Peshawar the june 06.2023

BETTER COPY

To,

The government of Khyber pakhtunkhwa,  
Elementary & secondary education department.

Subject:-

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

Dear sir

I am directed to refer to your letter No SO(PRIMARY.M)E&SED/22/Appointment/2023 dated 18.4.2023 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 6.8.2020 thus no provision exists to decline or forgo promotion.

2. the basic Rational behind the deletion of the ibid rule is aimed at preventing a civil servant from temptation for illicit main by sticking to a single lucrative post/position or to prevent those who tend to forgo promotion to evade posting/transfer or show lace of capacity to tackle higher responsibilities in case of promotion therefore it is obligatory upon every civil servant to accept promotion in every condition.

3. furthermore, those officer/officials who do not comply with promotion order of the competent authority at try to evade promotion through different means shall be proceeded against under Khyber pakhtunkhwa civil servants (efficiency & discipline) rules, 2011 please.

Yours faithfully,

Issa Muhammad Khan  
Section Officer (Policy)

Endst: of even No & date



(13)

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

(MUHAMMAD ISHAQ)  
SECTION OFFICER (PRIMARY MALE)

Copy forwarded to the:

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

SECTION OFFICER (PRIMARY MALE)



AMBER

GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
CIVIL SECRETARIAT PESHAWAR  
(Phone No.091-9223507)

No. SO (Primary-M)/EBSED/2-6/2023  
Dated Peshawar the, June 26<sup>th</sup>, 2023

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

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

*[Handwritten Signature]*  
26/6/23

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

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

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

Encl: NA

*[Handwritten mark]*

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

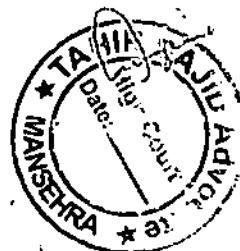
Copy forwarded to the:

- 1. PS to Secretary, EBSE Department Khyber Pakhtunkhwa.

*[Handwritten mark]*

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

*[Handwritten Signature]*



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 1909).

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/No	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. Hafayat 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-1  
E&SE Department

Provincial President  
All Primary Teachers Association  
Khyber Pakhtunkhwa

(Mr. Hafayat Ullah)  
General Secretary APTA  
Peshawar

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

(Abdullah)

Additional Secretary (Establishment)



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.

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

2. The meeting started with recitation from the Holy Quran, the chair welcomed the participants. The Deputy Director (Establishment) of Directorate of Elementary & Secondary Education outlined the item 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.

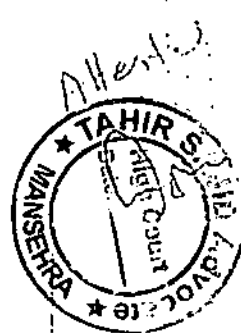
(Mr. Fazal Wahid)  
Deputy Director  
E&SE Department

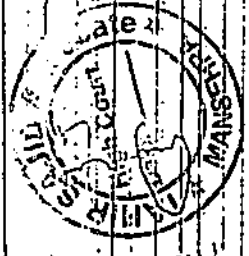
(Mr. Aziz Ullah)  
Provincial President  
All Primary Teachers Association  
Khyber Pakhtunkhwa

(Mr. Razaqat Ullah)  
General Secretary APTA  
Peshawar

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

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





Handwritten signature or initials in the top left corner.

WP 1442-2023 AZIZULAH VS GOVT OF PK43

Assistant Director (Etabbi-1)  
Ministry of Secondary Education  
Khyber Pakhtunkhwa

Assistant Director (Etabbi-1)  
Ministry of Secondary Education  
Khyber Pakhtunkhwa

Handwritten signature and date: 17/01/2023

The vice is submitted for perusal and necessary actions please.

Departmental Promotion Committee.  
 Teachers below 25-10 may be exempted of implications of the amendment in the rules. The  
 7(2) have offered regarding a large number of Female Teachers. That it is proposed that  
 In view of the above, this office is of considered opinion that the deletion of rules  
 been asked for submission of consolidated case.  
 Chairman, Departmental Promotion Committee, Khyber Pakhtunkhwa at his office. It is  
 that, in the light of the minutes of meeting dated 6-07-2023, held under the  
 (Primary-1) & SED-1/21/19/2023 dated 12-06-2023.  
 The same was received by this office from your good office vide letter No.50  
 civil servant to accept promotion under every condition.  
 that there exists no provision in decline or forgo promotion. It is obligatory upon every  
 (Wing) vide letter No.50 (Policy) & AD/1-17/20 dated 6-06-2023 accordingly stated  
 That the Government of Khyber Pakhtunkhwa Establishment Department (Regulation  
 No.50 (Return-1) & SED-1/21/19/2023 for necessary guidelines.  
 That your good office forwarded the same to the quarter concerned vide letter  
 perusal in  
 (ii) It is the responsibility of the civil servant to either accept or turn down the offer of  
 promotion.  
 (i) Now it is obligatory upon the civil servant to accept promotion in every condition.  
 No.6987 dated 16-02-2023.  
 That this office has to guide from your good office in the following words vide letter  
 No.6987 dated 16-02-2023.  
 vide notification No. SCB-VI (EAD)/1-17/20 dated 06-08-2023.  
 dated Rule 7(2) in the Civil Servants (Appointment, Promotion & Transfer Rules) 1989)  
 That Government of Khyber Pakhtunkhwa Establishment Department (Regulation Wing)  
 present list of Ministry about the background of the case as under

I am directed to refer to the letter No.50 (Primary-1) & SED-1/21/19/2023 dated 12-06-2023 on the subject cited above and in  
 G. M. Khattak, Director of the Ministry of Secondary Education, Khyber Pakhtunkhwa, Peshawar.  
 Subject: - MINUTES OF THE MEETING  
 Khyber Pakhtunkhwa Peshawar.  
 The Section Officer (Primary-Wing),  
 Ministry of Secondary Education Department,  
 Khyber Pakhtunkhwa Peshawar.

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

No. 8145  
 Date: 21-7-2023  
 Email: minob@kpk.gov.pk  
 Phone: 091-9222344



(18)

Directorate of Elementary & Secondary Education, KPK

To,

Peshawar  
(21-7-2023)

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

Subject: Minutes of Meeting

Dear Sir,

I am directed to refer to letter no (SO Primary-M)  
E&SED/S-1/G.Misc/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(5) in civil servants (appointment, promotion and transfer Rule 1999) vide notification no: SOR-VI (E&AD)1-3/2020 dated 06-08-2020
- That this office sought guidance from your good office in the following words vide letter No 6987 dated 06-02-2023
  - (i) Now it is obligatory upon civil servant to accept promotion.
  - (ii) It is of civil servant to either accept/turndown the offer of promotion.
- 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 those exists no provision to decline/forgo promotion. It is obligation upon every civil servant to accept promotion under every condition.
- That in light of the minutes of meeting dated 6-07-2023 held under the chairmanship of Hon. Additional Secretary Establishment at his office. This office has been asked for submission of consolidated case.

In view of the above this office is of considered opinion that the deletion of Rules 7(5) have affected negatively a huge members of female teachers.

The case is submitted for and necessary actions please.

Copy of the above to;

1. PA to director Local Directorate
2. Master Copy

Assistant Director  
Elementary & Secondary  
Education, Khyber Pakhtunkhwa





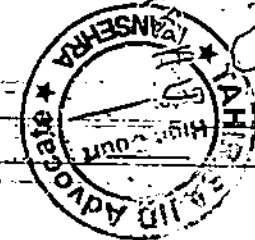


(20)

ANN: F



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT  
No. SO(Policy)E&AD/1-3/2023  
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-MVE&SED/2-  
2/Appointment-Rule/2023 dated 23.05.2023 on the subject noted above and to state that  
necessary guidance has already been rendered to your good office vide this department letter of  
even No. dated 06.05.2023 (copy enclosed).

Yours faithfully,  
  
Section Officer (Policy)

Encl. Of even No. & dtls

Copy forwarded to:-

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

SO(Primary-MVE&SED/2-2/Appointment-Rule/2023 dated 23.05.2023)



REPUBLIC OF INDONESIA VS GOVT OF POST

(10/1)

1  
2  
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5

/

(20)

ANN: "F"



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

10

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, 1959.**

Dear Sir,  
I am directed to refer to your letter No. SO(Primary-MYE&SED/2-  
2/Appointment-Rule/2023 dated 23.05.2023 on the subject noted above and to state that  
necessary guidance has already been rendered to your good office vide this department letter of  
even No. dated 06.05.2023 (copy enclosed).

Yours faithfully,

Section Officer (Policy)

Enclt. 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.

FOR OFFICIAL USE ONLY



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT  
No. SO(Policy)E&AD/1-3/2020  
Datd 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(Policy-M)/ERSEN/2-2/Appointments/  
Rule/2023 dated 23.08.2023 on the subject noted above and to state that necessary  
guidance has already been tendered to your good office vide this department letter of even  
No. dated 06.06.2023 (copy enclosed).

Yours faithfully,

Section Officer (Policy)

Encls. Of even No & date

Copy forwarded to the:-

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

Section officer (Policy)

VP1447-2023 AZIZULLAH VS GOVT CP PGC



22

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MANSHEHRA



Phone No. 011-2211 101-1000 202311  
E-mail/Address: Director, Education, Manshera  
Fax: 011-2211 1011-1011  
MANSHERA

No. 2151 Dated 25/9/2024

To  
The All Sub-Divisional Education Officer,  
(Male) District Manshera.

Subject: SUBMISSION OF COMPLETE FILES IN RESPECT OF PSHT FOR PROMOTION  
AGAINST CT/DM/PET OPS-15.

Memo

I am directed to refer to the subject cited above and inform you that in the light of objection raised by DPC committee for the promotion of PSHTs to CT/DM & PET held on 26-03-2024 in the office of DDO (M) Manshera vide Enclt: No. 2608 dated 25-03-2024 that all PSHTs having BA with CT/DM/PET are bound to submit their promotion files.

Allidavit regarding forgo is not acceptable, therefore all PSHT with BA/CT, DM & PET from S.S.I. No. 01 to 495, submit your complete files through ASDEO/SDEO concerned up to 30-Sep-2024, positively otherwise strict disciplinary action will be taken against you under E&D Rule 2011.

As per letter of Government of Khyber Pakhtunkhwa Establishment Department No. SOE Policy J&A/D/1-3/2020 Dated Peshawar the June 06, 2023.

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

*sd*  
DISTRICT EDUCATION OFFICER  
(MALE) MANSHEHRA

Enclt No. 2159-53 Dated 25/9/2024

Copy for information to the:

- 1. The Director E&SE KPK Peshawar.
- 2. The Deputy Commissioner Manshera
- 1. Office Copy.

BY: DISTRICT EDUCATION OFFICER  
(MALE) MANSHEHRA



# بخدمت جناب سیکرٹری تعلیم خیبر پختونخواہ

اپیل!

عرض ہے کہ گورنمنٹ آف خیبر پختونخواہ کی جانب سے جو لازمی پروموشن کا حکم نامہ جاری ہوا وہ ایک متنازعہ نوٹیفیکیشن ہے جس سے ہمیں درج ذیل تحفظات ہیں۔

1- PSHT پہلے سے سکیل 15 میں ذمہ داریاں سرانجام دے رہے ہیں۔ اپیل دہندہ کی عمر 55 سال ہے اگر وہ سی ٹی پوسٹ لینا چاہے تو سکیل 15 میں ہی آئیں گے اور سینارٹی متاثر ہو کر بارٹم میں چلے جائیں گے جس کا نقصان یہ ہے کہ وہ SST پوسٹ سے محروم رہ جائیں گے۔

2- یہ کہ جبرا C.T پوسٹ لینا ہمیں منظور نہیں ہے کیونکہ ایک سال کے اندر اندر زیادہ تر PSHT، SST پوسٹ پر پروموٹ ہونے والے ہیں۔

3- سابقہ حکومت نے پہلے سے PSHT/SPST اور PST کو اپ گریڈ کیا ہے جو کہ 01-07-2023 سے نافذ العمل ہے لیکن مالی کمی کی وجہ سے تاحال تاخیر کا شکار ہیں۔

4- یہ کہ سکیل 15 سے سکیل 15 میں جانا کہاں کا پروموشن ہے یہ تو صرف کیڈر تبدیل ہو جانا ہے اور ہمارا مطالبہ پروموشن اپ گریڈیشن ہے جس میں واضح تبدیلی آجائے گی۔

لہذا ہم اساتذہ حکومت خیبر پختونخواہ سے مطالبہ کرتے ہیں کہ مذکورہ نوٹیفیکیشن کو منسوخ کریں اور اساتذہ کی بے چینی کو ختم کریں ورنہ ہم عدالت جانے میں حق با جانب ہوں گے۔

عبدالرحیم PSHT

GPS دائرہ سرکل شہیلیہ مانسہرہ

سینسلس  
A.9  
15/7/2024



1- جناب سیکرٹری تعلیمات KPK

2- جناب ڈائریکٹر تعلیمات KPK

~~SECRET~~

VP 4412-2023 AZZULIAN VA GOVT OF PG 13



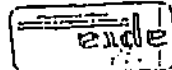
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~~SECRET~~  
8/17/23  
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*Multiple paragraphs of handwritten text in Malayalam script, appearing to be a legal document or court order.*

Annexure - H

APTA Institute  
Devi Pathy School Road,  
Gubbalur Fisheries City.



APTA Institute - Pathyathur

APTA Institute  
Devi Pathy School Road,  
Gubbalur Fisheries City,  
Tamil Nadu - 625 012

Sl. No.	U.S.L. No.	Name of Present School	Name	Father's Name	SPS	Acad	Div.	Prof	D.O.B	Date of Promotion	DiAppt	PFC Date	IO charge
180	1238	GPS NOT BAHALLAH	MUHAMMAD RAFAQAT	MUHAMMAD ZAREENO	15	BA	2nd	PTC/CT	08/04/1972	25-Feb-13	3/28/1992	3/28/1992	3/28/1992
181	1239	GPS BAN	MUHAMMAD AHMAD	JUMMA KHAN	15	BA		PTC	02/09/1972	25-Feb-13	3/28/1992	3/28/1992	3/28/1992
192	1240	GPS BHURAJ	ABDUL WAHEED	REHMAAT ULLAH	15	BA		PTC	28/01/1973	25-Feb-13	3/28/1992	3/28/1992	3/28/1992
193	1241	GPS JABBRI BHOONJA	MUHAMMAD IQBAL	GHULAM RABBANI	15	FA		PTC	02/04/1968	25-Feb-13	3/29/1992	3/29/1992	3/29/1992
194	1242	GPS RATA NALLA	SARFRAZ	KALFA KHAN	15	BA		PTC	28/03/1969	25-Feb-13	3/29/1992	3/29/1992	3/29/1992
195	1243	GPS LASPATAH	MUHAMMAD MUNSIF	HABIBULLAH	15	FA		PTC	02/05/1969	25-Feb-13	3/29/1992	3/29/1992	3/29/1992
196	1249	GPS BASOOT	MUHAMMAD ZAMAN	ILAL	15	BA		PTC/B.ED	14-04-71	25-Feb-13	3/29/1992	3/29/1992	3/29/1992
197	1250	GPS MARDOODAH	MUHAMMAD YOUSUF	MUHAMMAD ZAMAN	15	FA		PTC	18/03/1972	25-Feb-13	3/29/1992	3/29/1992	3/29/1992
198	1251	GPS MARDOODAH	MUHAMMAD YOUSUF	MUHAMMAD ZAMAN	15	BA		PTC	15/03/1973	25-Feb-13	29-03-92	29-03-92	29-03-92
199	1252	GPS RANJHA	SHABBIR HUSSAIN SHAH	HAYAT SHAH	15	BA	2nd	PTC/CT/B Ed	21/12/1969	25-Feb-13	3/30/1992	3/30/1992	3/30/1992
199	1254	GPS KIYARA	YOUSAF UR REHMAN	MAROOF	15	BA	2nd	PTC/CT/B Ed/M ed	28/10/1970	25-Feb-13	3/30/1992	3/30/1992	3/30/1992
200	1255	GPS LOWER GUL MERA	M TARIQ KHAN	ABDUR RASHID KHAN	15	MA	2nd	PTC/CT/B Ed/M ed	28/10/1970	25-Feb-13	3/30/1992	3/30/1992	3/30/1992
201	1256	GPS NARBEER	MIRZA AHMAD SAEED	MUHAMMAD IRFAN	15	BA		PTC/B.ED	05/05/1972	25-Feb-13	3/30/1992	3/30/1992	3/30/1992
202	1258	GPS BAGAL CHAR BALA	SHABEER AHMAD	ALI ZAMAN KHAN	15	BA	2nd	PTC/CT	21/05/1968	25-Feb-13	4/1/1992	4/1/1992	4/1/1992
203	1252	GPS HANGRAJ	ABRAR MUSSAIN	ABDUL QAYYUM	15	FA		PTC	25/03/1968	25-Feb-13	4/2/1992	4/2/1992	5/13/1988
204	1263	GPS SANDHOO	MUHAMMAD ABBAS	MUHAMMAD TAMAZ KHAN	15	MA	2nd	PTC/CT/B Ed/M ed	01/04/1968	25-Feb-13	4/2/1992	4/2/1992	6/1/1988
205	1265	GPS JABBLAN BISSIAN	AMAN ULLAH	MUHAMMAD ISMAIL	15	BA		PTC	03/01/1973	25-Feb-13	4/8/1992	4/8/1992	4/8/1992
206	1270	GPS SHADORE BALA	ATTA MUHAMMAD	MUHAMMAD ISMAIL	15	FA		PTC	25/04/1965	25-Feb-13	4/30/1992	4/30/1992	1/28/1988
207	1271	GPS BRADDAR	ABDU UR REHMAN	GHULAM HAIDAR	15	FA		PTC	15/03/1967	25-Feb-13	4/30/1992	4/30/1992	5/5/1988
208	1280	GPS KANSHIAN BALA	MANZOOR HUSSAIN	HAMIDULLAH	15	BA		PTC/B.ED	10/06/1967	25-Feb-13	5/10/1992	5/10/1992	5/10/1992
209	1285	GPS TANGRI	MUNIR AFZAL	MUHAMMAD AFZAL	15	FA		PTC	12/04/1969	25-Feb-13	5/10/1992	5/10/1992	5/10/1992
210	1288	GPS ANDRASI PHAGAL	ALI MUHAMMAD	MAN MUHAMMAD SADIQ	15	BA		PTC/B.ED	02/01/1971	25-Feb-13	5/10/1992	5/10/1992	5/10/1992
211	1292	GPS HAKKA BUBRAL	MUHAMMAD IQBAL	ALI GOHAR	15	FA		PTC	10/10/1970	25-Feb-13	5/17/1992	5/17/1992	5/17/1992
212	1294	GPS GUL SARI	ABDUL SATTAR	MUHAMMAD HOORANI	15	FA		PTC	04/01/1970	25-Feb-13	5/21/1992	5/21/1992	5/21/1992
213	1294 A	GPS SHOHAI NAJAF KHAN	MUHAMMAD ZAHID	MUHAMMAD FARID KHAN	15	BA		PTC/B Ed	02/04/1971	19-Nov-15	30/06/1992	30/06/1992	30/06/1992
214	1258	GPS BATTANG G H ULLAH	MUHAMMAD RAFIQUE	HADYATULLAH	15	FA		PTC/CT	04/02/1970	25-Feb-13	8/1/1992	8/1/1992	8/1/1992
215	1259	GPS CHANJA	GHULAM MURTAZA	GHULAM RABANI	15	FA		PTC	09/09/1968	25-Feb-13	10/10/1992	10/10/1992	10/5/1990
216	1300	GPS CHITTI DHERI	MISHTAQ	M AJOOD KHAN	15	BA	2nd	PTC/CT/B Ed	01/04/1968	25-Feb-13	10/26/1992	10/26/1992	5/5/1988
217	1312	GPS SUNDAR	ABDUR RAZAQ	MUHAMMAD AKBAR KHAN	15	BA		PTC	01/05/1968	25-Feb-13	11/21/1992	11/21/1992	5/25/1988
218	1320	GPS MANNA	MUHAMMAD SARWAR	WALI UR REHMAN	15	BA	2nd	PTC/CT/B Ed	15/06/1970	25-Feb-13	11/21/1992	11/21/1992	6/30/1992
219	1322	GPS SARAI DANDA KHOLIAN	JEHAN ZEB	AKMAL KHAN	15	MA	2nd	PTC/CT/B Ed	01/01/1972	25-Feb-13	11/21/1992	11/21/1992	7/1/1992
220	1323	GPS KHALABUT	SHAH REHMAN	MUHAMMAD ZAMAN	15	SSC		PTC	19/12/1972	25-Feb-13	11/21/1992	11/21/1992	8/20/1992
221	1328	GPS SHAROTA TOOT	HAKIM KHAN	AHMED KHAN	15	BA	1st	PTC/CT	03/03/1965	25-Feb-13	11/22/1992	11/22/1992	5/23/1988
222	1331	GPS KULHARY NORTH	NASEER AHMED	MUHAMMAD GUL	15	BA		PTC	15/11/1965	25-Feb-13	11/22/1992	11/22/1992	4/14/1988
223	1338	GPS GULI BAGH NO 2	MUHAMMAD NAYAZ	MUHAMMAD SAHRIF	15	FA		PTC	01/08/1967	25-Feb-13	11/22/1992	11/22/1992	11/22/1988
224	1344	GPS KUND BALA	MUHAMMAD ZAREEN	NOOR SAID	15	MA	2nd	PTC/CT/B Ed	01/01/1969	25-Feb-13	11/22/1992	11/22/1992	4/16/1988
225	1346	GPS JAB KASHTRA	AMJAD IMRAN	HAMAT ULLA	15	BA		PTC/B.ED	18-03-69	25-Feb-13	11/22/1992	11/22/1992	12/16/1990
226	1348	GPS DOSIRI	MUHAMMAD BAHARAS	M FARID	15	FA		PTC	12/05/1969	25-Feb-13	11/22/1992	11/22/1992	6/13/1990
227	1349	GPS PATHAN COLCHY	ARIF HUSSAIN	MUHAMMAD MAROOF	15	BA		PTC/CT	15/05/1969	25-Feb-13	11/22/1992	11/22/1992	11/24/1988
228	1350	GPS DATTA	ABDUR REHEEM	MUHAMMAD YOUSAF	15	BA	2nd	PTC/CT	21/01/1970	25-Feb-13	11/22/1992	11/22/1992	12/1/1988
229	1351	GPS BUHRAJ	MUHAMMAD SADIQAT	MUHAMMAD ASLAM	15	MA	2nd	PTC/CT/B Ed/M ed	23/02/1970	25-Feb-13	11/22/1992	11/22/1992	7/1/1992
230	1352	GPS POGDIAL	MUHAMMAD RIZAZ	ABDUR REHMAN	15	FA		PTC	15/03/1970	25-Feb-13	11/22/1992	11/22/1992	11/22/1989
231	1353	GPS MADHAN	ISHAQ AHMAD	TAJ MUHAMMAD	15	FA		PTC/CT	30/03/1970	25-Feb-13	11/22/1992	11/22/1992	5/7/1991
232	1358	GPS HAR NAKKA	ARIF HUSSAIN SHAH	USMAN SHAH	15	BA	2nd	PTC	04/04/1973	25-Feb-13	11/30/1992	11/30/1992	8/1/1992
233	1359	GPS SAFAIDA	MUHAMMAD MUSHAL	SHEER ZAMAN	15	MA	2nd	PTC/CT/B Ed	30/04/1971	25-Feb-13	2/28/1993	2/28/1993	2/28/1993
234	1363	GPS POTH SHAMGT	ABDUL RASHEED	FAROZ KHAN	15	BA		PTC	08/04/1971	25-Feb-13	2/28/1993	2/28/1993	2/28/1993
235	1364	GPS BAJOD MORE BIFFA	ZULFIQAR AHMED	ABDUR REHMAN	15	MA		PTC/CT/B Ed	08/04/1971	25-Feb-13	2/28/1993	2/28/1993	2/28/1993
236	1369	GPS BARATT	LIQAT ALI	TAJ MUHAMMAD	15	FA		PTC	12/05/1973	25-Feb-13	3/1/1993	3/1/1993	3/1/1993
237	1367	GPS MUSHAL	TARIQ MERRAQQO	M ASHRAF	15	BA	2nd	PTC/CT/B Ed	28/02/1969	25-Feb-13	3/1/1993	3/1/1993	3/1/1993
238	1373	GPS TEMBER	SHAH NAJAZ	FAZLUR REHMAN	15	BA	2nd	PTC/B Ed	05/04/1969	25-Feb-13	3/1/1993	3/1/1993	3/1/1993

Aheshan

TAMIR SAND ADU-  
High  
Date  
MANSEHRA



DBAM No. \_\_\_\_\_

338

BC No. \_\_\_\_\_

1 0 - 2 4 8 7

Name of Advocate \_\_\_\_\_

طاہر ساجد

S.No \_\_\_\_\_

52444

Fee Rs. 200/-



2024-25  
ANNUAL SECRETARY  
District Bar Association

# وکالت نامہ

بعدالت: جناب سروس ٹریسٹریٹس اور  
عنوان: عبدالرحیم بنام: سیکرٹری لوہو حکومہ KPK  
منجاب: اریبلڈنٹ نوعیت مقدمہ: سروس اور سیل

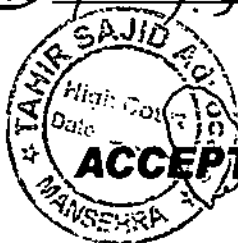
## باعث تحریر آئیکہ

دریں مقدمہ عنوان بالا میں اپنی طرف سے برائے بیروی و جواب دہی بمقام اریبلڈنٹ کے لئے

طاہر ساجد اڈووکیٹ بمقامی کورٹ

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 مظہر حاضر نہ ہو 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 کچہری کے علاوہ کسی اور جگہ کچہری کے مقررہ اوقات سے پہلے یا بروز تعطیل بیروی کرنے کے مجاز نہ ہوں گے۔ اگر مقدمہ کچہری کے علاوہ کسی اور جگہ سماعت ہوا یا کچہری کے اوقات کے آگے پیچھے سماعت ہونے پر مظہر کو کوئی نقصان پہنچے تو وکیل موصوف ذمہ دار نہ ہوں گے اور وکیل موصوف کو عرضی دعویٰ اور درخواست اجراء ڈگری و نظر ثانی اپیل و نگرانی 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 دستاخی و راضی نامہ و دستبرداری و اقبال دعویٰ کا اختیار بھی ہوگا بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یا یکطرفہ درخواست حکم امتناعی یا فیصلہ قبل از ڈگری اجراء ڈگری بھی وکیل موصوف کو بشرط ادا نیگی علیحدہ محتانہ ادا کرنے کا مجاز ہوگا اور بصورت ضرورت بد وراں مقدمہ یا اپیل و نگرانی کسی دوسرے وکیل یا بیرسٹر 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 بیروی 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۔

سورہ 21 اکتوبر 2024



سید عبدالرحیم  
4  
اریبلڈنٹ