



BEFORE THE HONORABLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR CAMP COURT ABBOTTABD

*incharge institution
section take the comments
and place it on file*

25/7/24

Service Appeal No: 243/2024

Mst Amrazia Bagum.....Appellants

VERSUS

Government of Khyber Pakhtunkhwa through Chief Secretary &
Others.....Respondents

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Dated: 25/07/2024

[Signature]
District Education Officer (F)
Abbottabad



**BEFORE THE HONORABLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR CAMP COURT ABBOTTABD**

Service Appeal No: 243/2024

Mst Amrazia Bagum.....Appellants

Khyber Pakhtunkhwa
Service Tribunal

VERSUS

Dist. No. 17201

2. Secretary Establishment KPK, Peshawar.
3. Secretary Law, parliamentary affairs, Human rights, KPK, Peshawar.
4. Secretary E&SED KPK, Peshawar.
5. Director Elementary & Education Khyber Pakhtunkhwa, Peshawar.
6. The District Education officer (F) Elementary and secondary education
Abbottabad.

Dated: 25-10-24

..... Respondents.

PARAWISE COMMENTS ON BEHALF THE RESPONDENTS NO. 2, to 6.

RESPECTFULLY SHEWETH:

PRELIMINARY OBJECTION

1. That Sub- Rule (5) of Rule 7 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules 1989 stands deleted vide Government of Khyber Pakhtunkhwa Establishment Department (REGULATION WING) Notification No. SO (Policy) E&AD/1-3/2020 dated 06-08-2020; thus, there is no provision exists to decline or forgo promotion and appellants did not challenge Ibid Notification dated 06-08-2020 hence, instant Service Appeals is liable to be dismissed.
2. Appellants in the instant Service Appeals did not challenge the notification Endst No. SD (policy)/EDAD/1-3/2020 dated 06-08-2020 under KPK Civil Servant Act 1973 (Act No XVIII) read with KPK Civil Servant (Appointment, Promotion and Transfer) rules 1989. Further amendment shall be made in rule 7 sub-rule (5) shall be deleted and did not challenged vires of amendment at any forum, hence time barred, as well as clarification letter issued by the KPK establishment department dated 06-06-2023 is the outcome of basic amendment as mentioned above, which is having binding force, still in field, hence Service Appeals are not maintainable, may kindly be dismissed.
3. That the appellants have not come to this Honorable Court with clean hand. Promotion order partially actualized except appellants.
4. That the instant Service Appeals is against the section 56 (d) of the Specific Relief Act hence, appellants are not entitled for any relief.
5. That present appellants in the light of amendments in APT rules, 1989 dated 6-8-2020 did not challenge the vires instead of clarification letter dated 6-6-2023 is the outcome of basic amendments, in this respect departmental appeals of the appellants being silent, time barred hence may be dismissed.
6. That the basic rationale behind the deletion of the Rule 7, sub-rule (5) is aimed at preventing Civil Servant for temptation for illicit gain sticking to a single lucrative post/ position or to prevent those who tends to forgo promotion to evade posting/ transfer or show lack of capacity to tackle higher responsibilities in case of promotion.

7. That the appellant stuck on her post in the local vicinity from years of times and blocked the promotion criteria of other teachers in the shadow of forgo promotion, as the result number of teachers on junior cadres are still waiting for promotion from decades. Right of forgo to promotion is the instrument in the hand of promotees to save the skin for their selves rather than education and national character building of children. Rational behind the amendments in Khyber Pakhtunkhwa APT Rules, 1989 is that i.e. experienced and skillful teachers are posted in different areas to embed the quality of education, to increase enrollment and maintain coordination/liaison with relevant stakeholders in respect of children, and better administration in overall school environment.

FACTUAL OBJECTIONS

1. That the Para No. 01, of the service appeals pertains to service record of the petitioners and promotion orders were issued by the competent authority vide Notification Endst No. 7717-25 dated 29-08-2023. (Copy of promotion order is annexed herewith as **Annexure-A**.)
2. No comments.
3. That the Para No. 03, of the service appeals as composed is incorrect hence, denied. It is submitted that Sub- Rule (5) of Rule 7 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules 1989 stands deleted vide Government of Khyber Pakhtunkhwa Establishment Department (REGULATION WING) Notification No. SO(Policy)E&AD/1-3/2020 dated 06-08-2020; thus, there is no provision exists to decline or forgo promotion and appellants in this stage did not challenged due to vires/laches Ibid Notification dated 06-08-2020 hence, instant service appeals is liable to be dismissed. (Copy of Notification No. SO (Policy) E&AD/1-3/2020 dated 06-08-2020 is annexed herewith as **Annexure-B**.)
4. That Para 4 of the service appeals is incorrect, hence denied. Appellant in Service appeal stage did not challenge the Notification Endst No. SO (Policy)/E & AD/1-3/2020 dated 06/08/2020 under KPK Civil Servant Act 1973 (Act No XVIII) read with KPK Civil Servant (Appointment, Promotion and Transfer) rules 1989. The clarification letter issued by the KPK establishment department dated 06-06-2023 is the outcome of basic amendments regarding forgoing promotion having binding force upon the promotional rights of appellants, hence Service Appeal is not maintainable, may kindly be dismissed. The Establishment Department's Notification dated 06-08-2020, the option/provision to forego promotion i.e. Rule 7(5) of the Khyber Pakhtunkhwa Civil Servant (APT) Rules, 1989, has been deleted consequence of which is that an employee cannot decline or forego promotion. The amendment (deletion) was made after obtaining the due approval of the rule making authority i.e. Chief Minister, Khyber Pakhtunkhwa, who is authorized for the purpose under Rule-26 of the Khyber Pakhtunkhwa Civil Servants Act, 1973. It is the prerogative of the state/Government to enact new laws, rules and policies for the betterment of education and the inhabitants of the state are bound to follow and obey all such laws, rules and policies. the Establishment Department vide its advice/letter dated.06-06-2023 (**Annex-C**) addressed to E&SE Department clearly indicated that

the basic rational behind the said amendment (deletion) is to prevent a civil servant from temptation for illicit gains by sticking to a single lucrative post/position or to prevent those who tend to forgo promotion to evade posting/transfer or who lack of capacity to tackle higher responsibilities in case of promotion. Therefore, it is obligatory upon every civil servant to accept promotion in all conditions as there is no option left to forgo promotion and those civil servants who do not comply with promotion order of the competent authority or try to evade promotion through different means are liable to be proceeded against under the Khyber Pakhtunkhwa Govt. servants (E&D) Rules, 2011. Both the amendment (deletion) made in Khyber Pakhtunkhwa Civil Servants (APT) Rules, 1989, vide Notification dated 06-08-2020 as well as the advice tendered vide letter No. SO(Policy)E&AD/1-3/2020 dated 06-06-2023 are lawful and legal from every angle and aspect. Moreover, non-submission of PERs have already been declared as "misconduct" under Khyber Pakhtunkhwa E&D Rules 2011 and the reminder is only to alert those whose are in the grab of deferring promotion resort to such tactics.

5. That the Para No. 05, of the service appeal as composed is incorrect hence, denied. Furthermore, Sub- Rule (5) of Rule 7 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules 1989 stands deleted vide Government of Khyber Pakhtunkhwa Establishment Department (REGULATION WING) Notification No. SO (Policy) E&AD/1-3/2020 dated 06-08-2020 hence, appellant cannot forgo her promotion.
6. That the Para No. 06 of the service appeal pertains to record. Furthermore, the basic rationale behind the deletion of the Rule 7, sub-rule (5) is aimed at preventing civil servant for temptation for illicit gain sticking to a single lucrative post/position or to prevent those who tend to forgo promotion to evade posting/transfer or show lack of capacity to tackle higher responsibilities in case of promotion.
7. That the Para No. 07 of the service appeals as composed is incorrect hence, denied. Establishment Department vide its advice/letter dated 06-06-2023 addressed to E&SE Department clearly indicated that the basic rational behind the said amendment (deletion) is to prevent a civil servant from temptation for illicit gains by sticking to a single lucrative post/position or to prevent those who tend to forgo promotion to evade posting/transfer or who lack of capacity to tackle higher responsibilities in case of promotion. Therefore, it is obligatory upon every civil servant to accept promotion in all conditions as there is no option left to forgo promotion and those civil servants who do not comply with promotion order of the competent authority or try to evade promotion through different means are liable to be proceeded against under the Khyber Pakhtunkhwa Govt. servants (E&D) Rules, 2011. Both the amendment (deletion) made in Khyber Pakhtunkhwa Civil Servants (APT) Rules, 1989, vide Notification dated 06-08-2020 as well as the advice tendered vide letter No. SO(Policy)E&AD/1-3/2020 dated 06-06-2023 are lawful and legal from every angle and aspect. Moreover, non-submission of PERs have already been declared as "misconduct" under Khyber Pakhtunkhwa E&D Rules 2011 and the reminder is only to alert those whose are in the grab of deferring promotion resort to such tactics. Amendments in the KP APT Rules, 1989 was made on dated 6-8-2020 vide Establishment Notification regarding forgo promotion was issued on 6-6 2023

thereafter the appellants filed writ petition on 3-8-2023, promotion order of appellants was issued on 29-8-2023 while judgment passed in appellants case on 30-1-2024 appellants neither attached nor annexed departmental appeal with her writ petition, while bogus departmental appeal without any sufficient proof attached with service appeal on 14-9-2023, which is hopelessly time barred and expressly barred by law whereas amendment made in the APT rules 1989 in Section VII (5) was made on 6-8-2020 neither challenged vires in any Court of law within the stipulated period. Appellants only challenged the clarification Establishment Notification No. SO (Policy) E&AD/1-3/2020 dated 6-6-2023 having prospective affects while appellants promotion were issued on 29-8-2023 is the outcome of basic amendment having the part of law and applicable on appellant terms and conditions service. Copy of judgment/order dated 30-1-2024 is annexed as (Annexure -D).

8. That the Para 8 of the Service appeals as composed is incorrect to the extent of forgone promotion in the light of amendment in the said rule as well as clarification letter dated 6-8-2020 and 6-6-2023 is very much clear, having still in field, prospective and binding effects upon the appellants promotion order dated 29-8-2023.
9. That the Para 9 of Service Appeals as composed is incorrect, the vires of basic amendment did not challenge within the stipulated period before any court of law nor the departmental appeals of appellants.
10. That the Para 10 of the Service Appeals as composed is incorrect to the extent of Writ Petition while judgments/orders passed by the PHC Abbottabad Bench dated 30-1-2024 were dismissed and not pressed, being hit under Article 212 of the Constitution of Islamic Republic of Pakistan 1973 and fall within the ambit of terms and conditions of service and not maintainable before the PHC Abbottabad Bench.

GROUNDS

- a) That the ground "a" as composed is incorrect hence, denied as the Judgment of August Supreme Court of Pakistan in Civil Appeal No. 410 of 2020 dated 02-06-2021, is clear in this regard. Further more detail reply has been given in Para 4 of the preliminary objections of the comments.
- b) That the ground "b" of the Service Appeals as composed is incorrect hence, denied as it has been categorically mentioned in the appointment orders of the appellants that "they will be governed by such rules and regulations and forced and as may be prescribed by the Government by time to time for the category of Government Servant to which they belong.)
- c) That the ground "c" of the Service Appeals as composed is incorrect hence denied as Sub- Rule (5) of Rule 7 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules 1989 stands deleted vide Government of Khyber Pakhtunkhwa Establishment Department (REGULATION WING) Notification No. SO(Policy)E&AD/1-3/2020 dated 06-08-2020; thus, there is no provision exists to decline or forgo promotion and appellant in this stage did not challenge Ibid Notification dated 06-08-2020 being time barred/ hit under principle of laches,

without jurisdiction, policy matter in respect of service right, hence the instant Service Appeals is liable to be dismissed.

- d) That the ground "d" of Service Appeals as composed is incorrect hence denied. Appellant stuck on her post in the local vicinity from years of times and blocked the promotion criteria of other teachers in the shadow of forgo promotion, as the result number of teachers on junior cadres are still waiting for promotion from decades. Right of forgo to promotion is the instrument in the hand of promotees to save the skin for their selves rather than education and national character building of children. Rational behind the amendments in APT rules, 1989 is that i.e. experienced and skillful teachers are posted in different areas to embed the quality of education, to increase enrollment and maintain coordination/liaison with relevant stakeholders in respect of children, and better administration in overall school environment.
- e) That ground "e" of the Service Appeals as composed is incorrect hence denied. Sub-Rule (5) of Rule 7 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules 1989 stands deleted vide Government of Khyber Pakhtunkhwa Establishment Department (REGULATION WING) Notification No. SO (Policy)E&AD/1-3/2020 dated 06-08-2020; thus, there is no provision exists to decline or forgo promotion and appellants did not challenge Ibid Notification dated 06-08-2020 hence, instant Service Appeals is liable to be dismissed.
- f) That the ground "f" of Service Appeals as composed is incorrect hence, denied. The amendments (promotion) in the APT rules, 1989 intends to ensure the quality of education and upbringing the development of children through skilled and experienced teachers. But right of forgo to promotion is the instrument in the hand of promotees to save the skin for their selves rather than education and national character building of children. Non-availing of promotions are the huge loss and investment in education sector by way of Government exchequer. In the present era, Pakistan emphasizes children education by uplifting in the light of UN charter as well as basic principle of Islam especially in backward areas. Moreover, Appellant did not challenge the vires of promotion amended dated 6-8-2020 on any forum within stipulated time, while they challenged the clarification letter dated 6-6-2023 having prospective effects on the proportion orders of appellant dated 29-8-2023, hence the Service Appeal of appellant may be struck down.
- g) That the ground "g" of Service Appeals as composed is incorrect, hence denied. The amendment regarding in pension rules still in field and did not challenge vires in any court of law and binding effects in the Province of KPK.
- h) That the ground "h" of Service Appeals as composed is incorrect, hence denied. At present appellant did not challenge the basic amendment dated 6-8-2020 and its vires regarding promotion while they challenge the clarification letter dated 6-6-2023 which is the outcome of APT rules, 1989 still in field having binding effect in the way of promotion. Hence Service Appeals may kindly be struck down.

It is therefore, humbly prayed that under the circumstances and forging comments, the instant Service Appeals may graciously be dismissed throughout with cost.



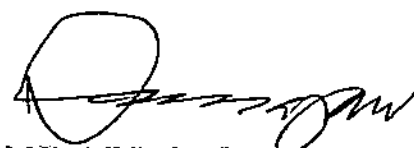
MR AHMAD ZEB
SPECIAL SECRETARY (ESTT)
THROUGH
MR ZULFIQAR ALI SHAH
SECRETARY ESTABLISHMENT
KPK PESHAWAR
(RESPONDENT NO: 2)



MR AKHTAR SAEED TURK
SECRETARY
LAW, PARLIAMENTARY
AFFAIRS & HUMAN RIGHTS
KPK, PESHAWAR
(RESPONDENT NO 3)



MR FIAZ ALAM
ADDITIONAL SECRETARY (ESTT)
E&SED KPK PESHAWAR
THROUGH
Mr. MASOOD AHMED
SECRETARY (E&SED)
KPK PESHAWAR
(RESPONDENT NO: 4)



MR ABDUL SAMAD
DEPUTY DIRECTOR
ON BEHALF OF
MST: SAMINA ALTAF
DIRECTRESS (E&SED)
KPK PESHAWAR
(RESPONDENT NO: 5)



MST: AYESHA SAEED
DISTRICT EDUCATION OFFICER
(FEMALE) ABBOTTABAD
(RESPONDENT NO: 6)

**BEFORE THE HONORABLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR CAMP COURT ABBOTTABD**

Service Appeal No: 243/2024

Mst Amrazia Bagum.....Appellants

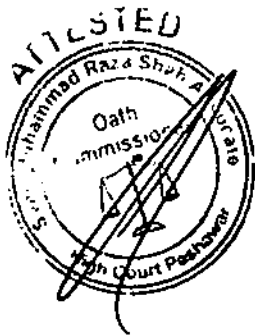
VERSUS

**Government of Khyber Pakhtunkhwa through Chief Secretary &
Others.....Respondents**

AFFIDAVIT

I, Mst Ayesha Saeed District Education Officer (Female) Abbottabad stated on oath that the contents of Para wise reply of comments are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

[Signature]
DEPONENT



NOTARIZED

25 OCT 2024

It is further stated on oath that in this appeal the opposing respondents have neither been placed Ex-Parte nor their defence shown to court.
[Signature]
25/10/24

**BEFORE THE HONORABLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR CAMP COURT ABBOTTABD**

Service Appeal No: 243/2024

Mst Amrazia Bagum.....Appellants

VERSUS

**Government of Khyber Pakhtunkhwa through Chief Secretary &
Others.....Respondents**

REPLY OF SUSPENSION ON BEHALF OF RESPONDENT NO. 2, to 6.

**REPLY FOR SUSPENSION OF IMPUGNED NOTIFICATION NO. SO
(POLICY) E & AD/1-3/2020 DATED 06-06-2023 TO THE EXTENT OF
APPELLANTS TILL FINAL DISPOSAL OF MAIN SERVICE APPEALS.**

Respectfully Sheweth,



1. That the Para 1 of the Suspension Application is legal, hence no comments, reply may be treated as part and parcel of the instant comments.
2. That Para 2 of the Suspension Application as composed is incorrect hence denied. The appellants did not challenge the vires of basic amendments dated 6-8-2020 in the APT rules, 1989 at any forum, in respect of promotion being time barred, while clarification letter dated 6-6-2023 is the outcome of basic amendment still in field and binding effects upon the rights of appellants, as well as Section 56 (D) of the Specific Relief Act, applicable in the instant case and fall within the ambit of Terms and Conditions of Service and also against the Notification dated 5-1-2028 passed by PHC Peshawar and Notification No. 5129-83 dated 17-3-2010 passed by PHC Peshawar and letter No. PSO/CS/KPK/1-26-2028 Dated Peshawar 5-6-2018 passed by the PS to Chief Secretary KPK (hereby annexed). Promotion order partially actualized except appellants.
3. That the Para 3 of the Suspension Application as composed is incorrect, hence denied. The legislation on the subject rules and policy is changed time

(10)

to time according to available circumstances. The promotion order of 29-8-2023 and clarification letter dated 6-6-2023 is the outcome of basic amendments dated 6-8-2020 in the APT rules, 1989, still in field, the vires of amendments did not challenge at any forum therefore, having binding effects upon the promotion rights of appellants.

4. That the Para 4 of the Suspension Application as composed is incorrect, hence denied. Children and their education is the prime objective and also guaranteed by the Constitution. There are 129 Schools suffered due to the instant litigation.

It is therefore, humbly prayed that in the light of reply/comments, instant Suspension Application may graciously be dismissed throughout with cost.


MST: AYESHA SAEED
DISTRICT EDUCATION OFFICER
(FEMALE) ABBOTTABAD
 **(RESPONDENT NO: 6)**

11



**BEFORE THE HONORABLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR CAMP COURT ABBOTTABD**

Service Appeal No: 243/2024

Mst Amrazia Bagum.....Appellants

VERSUS

**Government of Khyber Pakhtunkhwa through Chief Secretary &
Others.....Respondents**

AFFIDAVIT

I, Mst Ayesha Saeed District Education Officer (Female) Abbottabad stated on oath that the contents of Para wise reply of application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.


DEPONENT


ATTESTED

NOTARIZED

10 OCT 2024

11-(a)

B

PESHAWAR HIGH COURT

www.peshawarhighcourt.gov.pk
 info@peshawarhighcourt.gov.pk
 pshpsc@pshpsc.gov.pk

Encl: 0210148-64
 016 0210115
 0210115

226

Dated Peshawar the 05/01/2018

From: Registrar
 Peshawar High Court
 Peshawar.

To: All the districts & Sessions Judges
 Khyber Pakhtunkhwa to be Circulated
 To all Judicial in their Districts.

Subject: INJUNCTION AGAINST GOVERNMENT

Dear Sir,

I am directed to convey the concern of competent authority that the learned judicial officers of Khyber Pakhtunkhwa usually ignore the spirit of law contained in rule 3 to 3 order 39 C.P.C read with section 56 of Specific Relief Act 1877 while granting status quo orders/temporary injunctions. The learned judicial officers are reminded of obligations of law while disposing pleas for status quo orders/temporary injunctions.

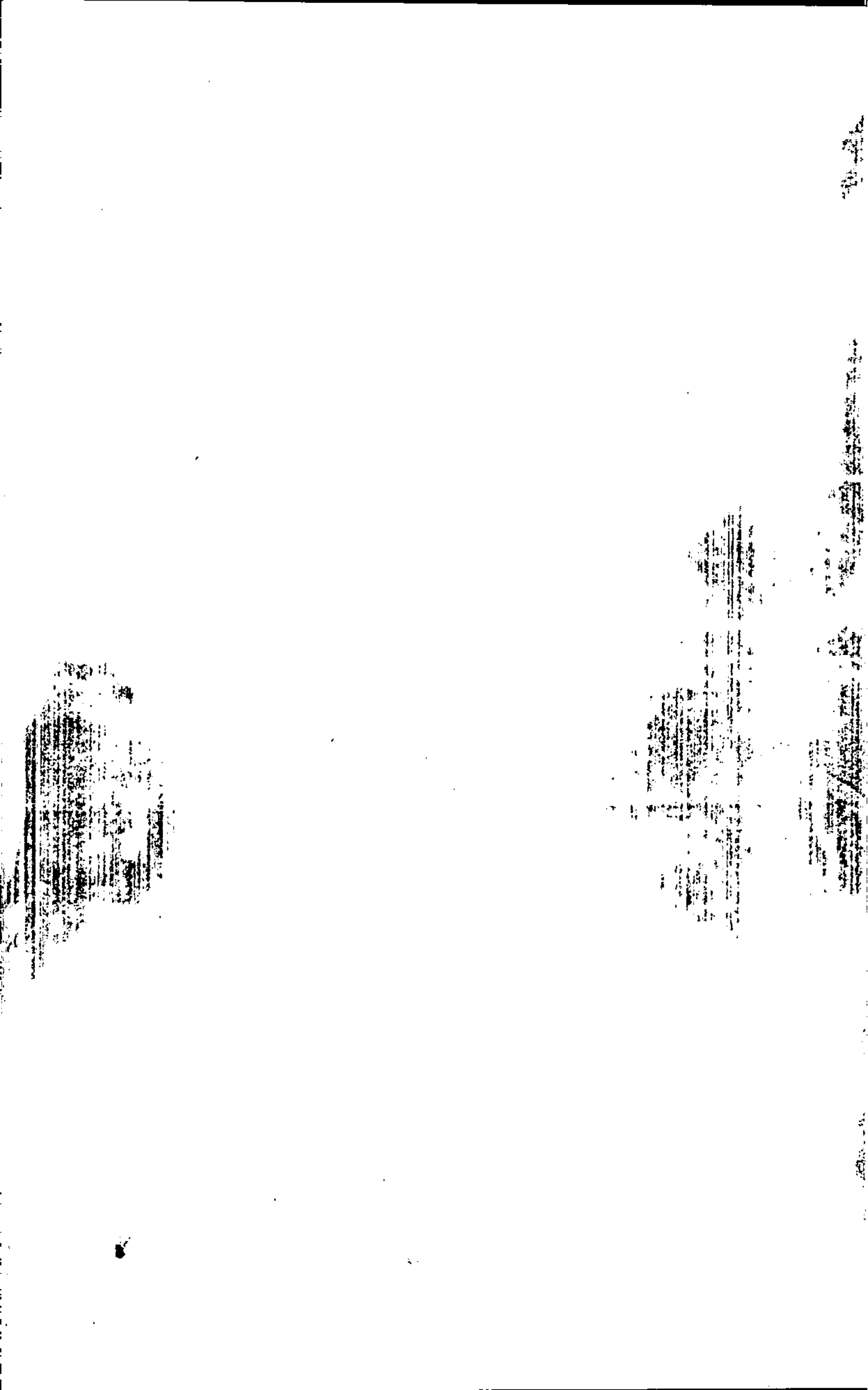
The learned judicial officers are bound to ensure compliance of conditions mentioned in aforesaid provisions of laws/rules before grant of status quo order/temporary injunction. Any lapse on their part in this respect will be considered breach of law and professional misconduct in future. Various instructions on the subject have already been communicated to all from time to time, but in future action shall be taken against violating the instructions.

(MUHAMMAD SALIM KHAN)
 PAS
 REGISTRAR

(MUHAMMAD SALIM KHAN)
 PAS
 REGISTRAR

For information to: Under Regulation (SDJ)





111 a a

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THE
PESHAWAR HIGH COURT
PESHAWAR

(dated Peshawar the: 05/01/2018

310/Admn

From

Registrar
Peshawar High Court
Peshawar.

To All the District and Session Judges
Khyber Pakhtunkhwa to be circulated
To all judicial in their Districts.

Subject: INJUNCTION AGAINST GOVERNMENT

Dear Sir,

I am directed to convey the concern of competent authority that the learned Judicial Officers or Khyber Pakhtunkhwa usually ignore the spirit of law contain in Rule 1 to 3 order 39 CPC read with section 56 of specific relief Act 1877 while granting status quo orders/temporary injunctions, the learned Judicial officers are reminded of obligations of law while disposing please for status quo orders/temporary injunctions.

The learned Judicial Officers are bound to ensure compliance of conditions mentioned in for said provision of laws/rules before the grant of status quo orders/temporary injunctions. Any laps on their part in this respect will be considered breach of law and professional misconduct in future. Various instructions on the subject has already been communicated to all from time to time, but in future action shall be taken against violating the instructions.

Muhammad Saleem Khan
PAS

Registrar.

Even.No dated
Copy forwarded for information to.

Attested
District Education Officer
Female Abbottabad
23/5/24

Muhammad Saleem Khan
PAS

National Educator Officer
Fenuia, Apurva
5

acknowled

REGISTRAR
(SYED MUSADIQ HUSSAIN GILANI)

etc

1. Secretary, Establishment Department, Government of NWFP with reference to letter No. SOB-III(ED&AD)-3/2010 Resolution No. 365 dated 17.02.2010 and subsequent letter No. SOB-III(ED&AD)-3/2009 dated 01.03.2010.
2. Secretary to Government of NWFP, Law, Parliamentary Affairs and Human Rights Department, Peshawar

Copy furnished to

Budst: No. 5129-83/17-17
Dated 17-3-17

REGISTRAR
(SYED MUSADIQ HUSSAIN GILANI)

etc

Yours Faithfully,

I am directed to refer to this Court direction C.No. 4(4-B), 7(4-B), 8(4-B) and 9(4-B) of Judicial Branch at pages No. 353, 354, 355 & 356 and to say that the courts are expected to follow the said directions in letter and spirit while dealing with applications for temporary injunction, especially in the matter involving public revenue, public developmental schemes etc. This directive may be circulated amongst all the judicial officers under your control

SUBJECT: INTERIM INJUNCTION / STAY ORDER

All the District & Sessions Judges / Zilla Qazis,
in NWFP.

From, The Registrar,
Peshawar High Court,
Peshawar.

Dated 17-3-17

No. 5129-83

All communications should be addressed to the Registrar Peshawar High Court, Peshawar and not to any other authority.	
Phone: 9210149 88	Fax: 9210149 88
Off: 9210156	Cell: 9210170

The PESHAWAR HIGH COURT, Peshawar

(11) (B)

227

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(11) "b"

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THE
PESHAWAR HIGH COURT
PESHAWAR

No. 5129/83

dated Peshawar the 17/03/2010

From

Registrar

Peshawar High Court

Peshawar.

To All the District and Session Judges/ Zilla Qazis,

In NWFP.

Subject: INTERM INJUNCTION/STATUS QUO

Sir,

I am directed to refer to this court directives C.No 4(4-8) 7(4-8), 8(4-8), and 9 (4-8) of Judicial Esta Code at page No 353, 354, 355 and 356 and to say that the courts are expected to follow the said directives said letter and spirit while dealing with applications for temporary injunctions, especially in the matter involving in public revenue, Public development scheme etc. This directive may circulate amongst all the judicial officers under your control.

Yours Faithfully,

(SYED MUSADIQ HUSSAIN GILANI)

REGISTRAR.

dated 17-03-2010.

Endst: No 5184-85/Admn

Copy forwarded to.

1. Secretary, Establishment Department, Government of NWFP with reference to letter No: SOE-III(E&AD)6-3/2010 Resolution No 365 dated 11-20-2010 and subsequent letter No. SOE-III(E&AD)6-3/2009 dated 1-3-2010.
2. Secretary Government of NWFP, Law, Parliamentary affairs and Human rights Department, Peshawar.

AS

(SYED MUSADIQ HUSSAIN GILANI)

23/5/24

11 "C" B

BETTER COPY

Court Matter
Most Immediate

PSO TO CHIEF SECRETARY
KHYBER PAKHTUNKHWA

No. PSO /CS/KPK/1-26/2016

Dated Pesh: the 5th June, 2018

To

1. All administrative Secretaries
In Khyber Pakhtunkhwa.
2. All Divisional Commissioners
3. All Deputy Commissioner
In Khyber Pakhtunkhwa

Subject: INJUNCTIONS AGAINST GOVERNMENT.

Dear Sir,

I am directed to forward herewith a copy of Peshawar High Court letter No. 181-83/Admn, dated 05-01-2018 alongwith following letters on the subject cited above.

S.No	Letter No.	Dated	Subject
1	5129-83/admn	17-10-2010	Interim injunction/status quo
2	3647-3846/admn	04-07-2001	Indiscriminate grant of injunctions and stay orders by the subordinate courts.
3	10221-10370/admn	27-10-1999	Interim injunction/status quo
4	9898-4997/admn Br	17-6-1997	Interim injunction/status quo

2. Law Department should inform all law officers & advocate General office. Accordingly to quote these instructions in all cases where stays have been OR being granted similarly Department should quote these instructions while defending Government case, involving stays.

Yours Faithfully

(khurshid Alam)
PSO to Chief Secretary
Tel: 091-9210355
Fax: 091-9210447

PS to Chief Secretary Khyber Pakhtunkhwa

Abdul

District Education Officer
Peshawar, Khyber Pakhtunkhwa
23/6/2018



(12) Annul "A"
OFFICE OF THE DISTRICT EDUCATION
OFFICER (FEMALE) ABBOTTABAD

PH# No. 0992-342533 FAX:0992-342314
Email dcfemale_abbottabad@yahoo.com

NOTIFICATION:

Consequent upon the recommendation of the Departmental Promotion Committee dated 22-03-2023, the following female SPSTs BPS-14 are promoted to the post of PSHT BPS-15 @ Rs. (23920-1980-83320) plus usual allowances as admissible on regular basis are hereby adjusted in the school noted against their names with immediate effect in the best public interest.

S.No	Sen #	Name	Father name	Present School	Remarks/ Place of Posting
1	5	SHAZIA NISAR	NISAR AHMED	GGPS M/Pura No 2	GGPS HABIB ABAD
2	7	NAGINA GHAFOOR	ABDUL GHAFOOR	GGPS No 3 M/Pura	GGPS KANGRORA
3	11	RUBINA BIBI	ABDUL AZIZ	GGPS Dhamtour	GGPS PHELWAN
4	12	SHAZIA KOUSAR	M.BASHIR ABASSI	GGPS Bandi Phulan	GGPS BAGH DARA
5	13	NASREEN BIBI	M.RAFIQUE	GGPS Thanda Choha	GGPS MAKRILA BOI
6	14	NAGINA BIBI	MUHAMMAD JAN	GGPS Paswal Mian	GGPS CHATTY MOHRI
7	16	SAEEDA	M.SABIR	GGPS Mahmda	GGPS BIAL
8	17	BUSHRA PERVEEN	M.URFAN	GGPS Chooni Kari	GGPS TARKOT
9	18	NAZIA SADDIQUE	M.SIDDIQUE	GGPS Hav/ Village	GGPS NAGRI PAYEEN
10	19	TAHIRA SHAHEEN	ROSHAN DIN	GGPS Jhangra	GGPS PATHIAN
11	21	NADIA ANJAM	KHANI ZAMAN	GGPS M/Pura No 1	GGPS DARRA DALOLA
12	23	FARZANA BIBI	S.ALI AKHTER	GGPS(comp) Atd	GGPS PAMSER TAJWAL
13	26	MAJIDA PARVEEN	WALI SULTAN	GGCMS Barwal	GGPS CHINJA
14	28	ANSA SHAHEEN	M.NAZEER	GGPS N/Shehr No 2	GGPS HOTHLA
15	34	NAZIA MUSHTAQ	M.MUSHTAQ	GGPS AKHREELA	GGPS LAHOOR KAS
16	35	REHANA ZEB	SARDAR AURANGZEB	GGPS Sultan Pur	GGPS KASORIAN
17	39	ABIDA BATOOL	HAQ NAWAZ KHAN	GGPS Batala	GGPS MUNDRIAN
18	40	NAILA BIBI	RASHID AHMED	GGPS Comprehensive	GGPS NOSHERA TAJWAL
19	42	SHAMA MEHBOOB	MEHBOOB ELAHI	GGCMS Mirpur	GGPS BACHA SANI
20	43	JAVERIA ASHRAF	MUHAMMAD ASHRAF	GGPS B/ Jalal Khan	GGPS BAMOCHI
21	44	ABIDA BIBI	HUKAM DAD	GGPS Jhangi	GGPS UPPER TAJWAL
22	45	RUKSHANDA HAFEEZ	M HAFEEZ KHAN	GGPS Nawasher no 1	GGPS MOHRA BIROTE
23	48	SAJJIDA YASEEM	KHAWAJA MUHAMMAD	GGPS Hav/Stat	GGPS FURLAN

District Education Officer
Female, Abbottabad

23/5/23

(13)

24	49	RAHILA ZEB	SARDAR AURANGZEB	GGPS Sultan Pur	GGPS SUMBAL DARA
25	50	SADIA SITTAR	ABDUL SATTAR	GGPS Nawansher no 3	GGPS JARRAL
26	51	ABIDA NIAZ	M.NIAZ	GGPS Sangal	GGPS Sangal
27	53	BUSHRA KHATOON	MUHAMMAD NAWAZ	GGPS BANDA PINUKHAIL	GGPS KANGER PAEEN
28	60	SHAHIDA BIBI	M.ZAMAN	GGPS Garga	GGPS SURMA GALI
29	76	NIAZMEEN	NOOR AHMED	GGPS Pattan Khurd	GGPS DAWATTA
30	81	SHAMIM ABBASI	ALI ASGHAR	GGPS Bagla Patan	GGPS BANDI CHAMYA
31	87	SOBIA BASHIR	MUHAMAD BASHIR	GGPS Hav/ Village	GGPS DANA NORAL
32	91	RUBINA SHAHEEN	AKBAR DIN	GGPS Solan	GGPS PALKOT
33	102	SHAISTA BIBI	M.SHARIF KHAN	GGPS Chatter Nath	GGPS KUTLI NAMLI MAIRA
34	108	SHAZIA BATOOL	RASOOL SHAH	GGPS Hari De Ban	GGPS TAKIA HALL
35	109	NOREEN BIBI	FAROZ DIN	GGPS Akhora	GGPS BERRI
36	123	TAHIRA BANO	MATLOOB KHAN	GGPS Dhamtour	GGPS SANGRARI
37	124	ZAHANAT BIBI	ALLAH DAD	GGPS Khola Kehal	GGPS TALKANDI
38	125	RIZWANA JABEEN	KALA KHAN	GGPS Malik Pura No.3	GGPS KANTHIALI
39	126	SHAHIDA	WALI MUHAMMAD KHAN	GGPS Tundi Dheri	GGPS DARWAZA
40	127	NAZISH BIBI	NAJEEB UR REHMAN	GGPS TAROR	GGPS DHARRA
41	128	FOZIA AYUB	MUHAMMAD AYUB	GGPS Malikpura No.2	GGPS GARANG NO.1
42	129	YASMEEN GUL	FAZAL UR REHMAN	GGPS Hav/ Village	GGPS MAJUHAN
43	130	SHAMSHAD NAZEER	M.NAZEER	GGPS Upper Kehal	GGPS NAKKA BOI
44	131	ABIDA PARVEEN	MUHAMMAD DAUD	GGPS Kutli Bagh	GGPS KUTLI BAGH
45	132	SOMIA BIBI	ZARDAD KHAN	GGPS Lunday	GGPS LASSAN
46	133	SUMAIRA SALEEM	M. SALEEM	GGPS Sheik ul Bandi no.1	GGPS BANDI MATRA
47	134	SUMAIRA BIBI	RAZA MUHAMMAD	GGPS Banda Saib khan	GGPS KANGAR HOT
48	135	GHAZALA BIBI	MOHD SIDDIQUE	GGPS Sarbana	GGPS PAGAR KHAN KALAN
49	137	SAIMA BIBI	SHAMRAIZ	GGPS Thanda Pani	GGPS MAIRA MASS
50	138	FOZIA BIBI	M.AMAN	GGPS SERI BAGNOTAR	GGPS NAMLI MAIR
51	139	RIFFAT HAMEED	ABDUL HAMEED	GGPS KHURI BANDA	GGPS JASWARA
52	140	FOQIA JAVED	JAVED KHAN	GGPS M.B.Behan	GGPS GHORA
53	141	HUMAIRA MASOOD	MASOOD AKHTER	GGPS Pangran	GGPS PIRKOT
54	142	IRAM SHAHZADI	MUHAMMADD ANWAR	GGPS Deesal	GGPS DANNA ALI
55	143	SHAMIM ABBASI	KHANI ZAMAN ABBASI	GGPS TARLA KHAITER	GGPS BARWALLA

All set - d

2-310-2024

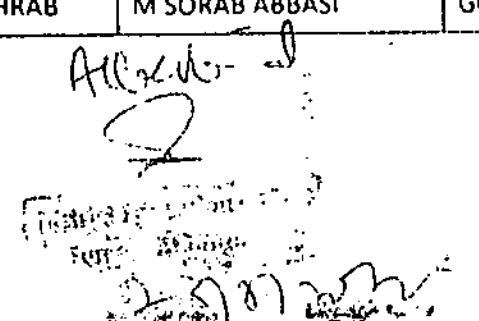
(14)

56	144	NUSRAT	FAZAL UR REHMAN	GGPS MAIRA MANDROCH	GGPS MUJAFI
57	145	GULNAZ	M.AYUB	GGPS Sheikul Bandi NO.2	GGPS BAREELA
58	146	SHUMILA NAZ ABASSI	NISAR AHMED	GGPS RUPPER	GGPS SUMMA KARAGA
59	147	SALMA NAZIR	M NAZIR	GGPS Jaica Mirpur	GGPS LAKHALA
60	148	RUKHSANA BIBI	BALAND KHAN	GGPS TARHANA	GGPS KUMAHARA
61	149	SOBIA REHNA	AURANGZEB KHAN	GGPS. Salhad	GGPS BOGRAN
62	150	NASEEM BIBI	BASHEER HUSSAIN	GGPS Lodhna	GGPS KHER PIR
63	151	MAH JABEEN	JUMMA KHAN	GGPS Mujahat	GGPS GALI MEERAN
64	152	TASLIM NAZIR	MUHAMMAD NAZIR	GGPS Ali abad	GGPS MOHALLAH KIANI
65	153	NAZIA NOREEN	FAZAL DAD KHAN	GGPS Mandroch	GGPS THATHI AHMAD
66	154	BIBI NUSRAT	KHALIQ DAD KHAN	GGPS Sheikhul Bandi 2	GGPS TANDARA KHURD
67	155	NAZIA BIBI	S.M.MISKEEN	GGPS Tarhana	GGPS THORAN KALAN
68	156	SHAMIM ARA	MIR ZAMAN	GGPS Comp Atd	GGPS MOHRI MAIRA
69	157	GULFAREEN	MAQBOOL UR REHMAN	GGPS Malik Pura No.3	GGPS SAMBLI KHOI
70	158	NAZIA SIKANDAR	SIKANDAR SHAH	GGPS Dara Salhad	GGPS BAGLA MASEENA
71	159	ATTIA BIBI	KALA KHAN	GGPS DARRA SALHAD	GGPS DHERI SERI
72	160	RUBINA KAMRAN	KAMARAN KHAN	GGPS Sangu de garl	GGPS PAYEEN
73	161	AMRAZIA BEGUM	RAFI UD DIN	GGPS NAWAN SHER NO.3	GGPS RANKOT
74	162	NOSHABA ZAHOR	ZAHOR SHAH	GGPS DARA SALHAD	GGPS ROMATI
75	163	ZUBAIDA KHATOON	MUHAMMAD IQBAL HUSSAIN	GGPS Kholiala	GGPS NAKKY SAIDA
76	164	NAZIA GUL	ZULFIQAR	GGPS KOKRIYA	GGPS DANNAH
77	165	GHAZALA SHAHEEN	MUHD BARKAT	GGPS Darkan	GGPS DHAKA PLUCK
78	166	ANSAR BIBI	KALA KHAN	GGPS Jhansa	GGPS KERI SARAFALI
79	167	SHAHIDA PARVEEN	GHULAM RASOOL	GGCMS Mirpur	GGPS DABBAN
80	168	GUL NAZ	M.AJAB	GGPS Nagakki No 1	GGPS JAGGIAN KOHALIAN
81	169	RIFFAT BIBI	SABIR UR REHMAN	GGPS SHEIK UL BANDI 2	GGPS BANDI PAHAR
82	170	SAEEDA BIBI	MUHAMMAD SULMAN	GGPS Kholi Kehal	GGPS HADORA BANDI
83	171	SHOIAB UN NISA	M. ALTAF ABBASI	CMS LORA	GGPS JABGRAN
84	172	NAHEEMA BIBI	HAQ NAWAZ	GGCMS DEWAL	GGPS SARHAN
85	173	IMTIAZ BIBI	KAMAL DIN	GGPS KIYALA	GGPS BATMARA
86	174	RASHIDA NOREEN	QAMAR ZAMAN	GGPS SAJIKOT NO.2	GGPS GALI KUTLA
87	175	SAIRA BANO	SHAHNAWAZ	GGPS Hav Village	GGPS BANOTA

August - 1

27/07/2024

88	176	NAZIA ZAINAB	M. RIAZ	GGPS KARACH NO1	GGPS CHANGLI
89	177	RAHEELA JADDOON	ARAB KHAN	GGPS KOKAL	GGPS JABRI KHAN KALAN
90	178	ANEELA NAZ	AURANGZEB	GGPS Kashka	GGPS GARANG DALOLA
91	179	PARVEEN	LAL KHAN	GGPS Khoo	GGPS PASSALA
92	180	NEELAM PARI	M. JAVID	GGPS PASWAL MIAN	GGPS SHER BY SYDAN
93	181	KAUSAR BIBI	RAJA BANARAS	GGPS PALASI	GGPS RIAWAL
94	182	SUMAIRA BIBI	MUHAMMAD HAROON	GGPS Upper Kehal	GGPS SALOL BANDI
95	183	FAIZA JAVED	M. JAVED	GGPS richbehn	GGPS SARGAL
96	184	ROBEENA AZIZ	AZIZ UR REHMAN	GGPS PAWA	GGPS KALAR KHAITER
97	185	AMINA HAFEEZ	HAFEEZ UR REHMAN	GGPS RIALA RUPPER	GGPS CHARBUT
98	186	SHAKEELA JAN	RAFIQUE AHMED	GGPS AKREELA	GGPS BAKOTE
99	187	SAIMA ASHRAF	M.ASHRAF	GGPS M/ Azlz Bang	GGPS ZIARAT KHOI
100	188	FAHMEEDA DILDAR	DIDAR AHMED	GGPS Shaeedabad	GGPS SHAHEED ABAD
101	189	NADIA KOUSAR	MUHAMMAD IQBAL	GGPS Sabal	GGPS UPPER KUTLI PHALKOT
102	190	MEHMOONA AHSAN	MUHAMMAD IHSAN ABBASI	GGPS GHAMBIR	GGPS DHAKAN PAISER
103	191	KISHWAR BAKHT	ABDUL QADOOS	GGPS Havelian	GGPS MARRI
104	192	UZMA SAEED	M SAEED	GGPS GAMBIR	GGPS KHUYIAN
105	193	SOBIA IMTIAZ	M. IMTIAZ	GGPS Nawansher no. 2	GGPS LARI BANOTA
106	194	UZMA BIBI	AKHTAR HUSSAIN	GGPS Dhong Malach	GGPS DHONG MALLACH
107	195	AYESHA BIBI	M RAFAQ	GGPS PHALLAH	GGPS BARWALA
108	196	NAZIA BIBI	MUHAMMAD YAQOOB	GGPS Danna Rankote	GGPS DANNA RANKOT
109	197	SAMINA MASOOD	MUHAMMAD MASOOD	GGPS LOWER MALKOTE	GGPS LONGAL
110	198	NAGEENA BIBI	FAZAL ELAHI	GGPS Badial	GGPS BADIAL
111	199	RABIA BIBI	MUHAMMAD IQBAL	GGPS Julgran	GGPS JULGRAN
112	200	TAHIRA SAFDER	SAFDAR ZAMAN	GGCMS Danna	GGPS BASOOT
113	201	SAIRA KHATOON	MUHAMMAD ISHAQ	GGPS Majuhan	GGPS GEHRI
114	202	SAIMA BIBI	M.YOUSAF	GGPS MAIRA MUZAFAR	GGPS TALHAR
115	203	SHABANA SHAHEEN	MUHAMMAD ARBAR	GGPS CHABRIAN	GGPS CHACHAN
116	204	RASHIDA MUHATAQ	MUHAMMAD MUSHTAQ	GGPS MALIKPURA NO.3	GGPS TORI SHAREEF
117	205	MEHNAZ BIBI	AURANGZEB	GGPS N. SEER	GGPS AMMANA
118	206	SAEEDA YOUNIS	MUHAMMAD YOUNIS	GGPS BATA KERI	GGPS RATTA BAGLA
119	207	NIGHAT JAMEEL	JAMEEL HUSSAIN	GGPS Khokhar Maira	GGPS SIALKOT
120	208	ANEELA SOHRAB	M SORAB ABBASI	GGPS NAGRI TOTIAL	GGPS BATAKANALA

Accepted


		HAKAMDAD	MUHAMMAD UAD (16)	GGPS KERI REKI	GGPS MAKOL DANA
122	210	SHABANA YOUSIF	M.YOUSIF	GGPS Dhunian	GGPS DHUNIAN
123	211	SHAHEEN AKHTAR	SHERZAMAN	GGPS Sailkot	GGPS KHOKHRIALA
124	212	SADIA BIBI	M. SAEED	GGPS AKHREELA	GGPS KHOI SAMBLI
125	213	NAIMA TAHIR	M.TAHIR	GGPS Manu-De-Ban	GGPS HAZEERA
126	214	BIBI SAJJIDA	MUHAMMAD ADDESS	GGPS City Atd	GGPS LOWER TAJWAL
127	215	ZAHIDA BIBI	MUHAMMAD SARWAR	GGPS Chankot	GGPS CHANKOT
128	216	NAILA BIBI	MUHAMMAD MUBIN	GGPS LOWER MALKOTE	GGPS HILL BIROTE
129	217	SHAMI NAZ	MUHAMMAD AZEEM	GGPS PRAN GOOT	GGPS PRAN GOOT

TERMS AND CONDITIONS.

1. They would be on probation for a period of one year.
2. They will be governed by such rules & regulations as may be issued from time to time by the Government.
3. Their service can be terminated at any time, in case their performance is found unsatisfactory during probation period. In case of misconduct she shall be proceeded under the rules framed time to time.
4. Charge report should be submitted to all concerned.
5. Their Inter- se seniority on lower post will remain intact.
6. No TA/DA is allowed for joining their duty.
7. They will give an undertaking to be recorded in their service book to the effect that if any over payment is made to them in light this order will be recovered and if she is wrongly promoted she will be reversed.
8. They should join their post within 15 days of the issuance of this notification. In case of failure to join their post within 15 days of the issuance of this notification, their promotion will expire automatically and no subsequent appeal will be entertained.
9. To all concerned for strict compliance of letter No. SO(Policy)E&AD/1-3/2020 dated June 6, 2023, that it is obligatory upon every Civil Servant to accept promotion in every condition in the one who do not comply with promotion order shall be proceeded under Khyber Pakhtunkhwa Civil Servant efficiency and discipline rule 2011.
10. Before handing over charge their documents may be checked if they have not required the relevant qualification as per rules they may not handed over the charge of posts.

**DISTRICT EDUCATION OFFICER
(FEMALE) ABBOTTABAD**

Endst: No. 7717-25 /Promotion SPSTs to PSHTs

Dated: 29/08/2023

Copy for information to the:

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Monitoring Officer, IMU Abbottabad.
3. District Accounts Officer Abbottabad.
4. All SDEOs (Abbottabad, Havellan, Lower Tanawal & Lora).
5. Budget & Accounts Officer Local Office.
6. Concerned Head teachers.
7. Teachers Concerned.
8. Office File.

**DISTRICT EDUCATION OFFICER
(FEMALE) ABBOTTABAD**

Handwritten signature
District Education Officer
Female Abbottabad

B

Ammeure ~ B

17

GOVERNMENT OF
KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
(REGULATION WING)

~~Ammeure - C~~
~~Ammeure - B~~

NOTIFICATION

Dated Peshawar the, 06 / 8 / 2020

SUP Policy E&A/1-3/2020: In exercise of the powers conferred by section 26 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973) the Chief Minister of Khyber Pakhtunkhwa is pleased to direct that in the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules 1989, the following further amendment shall be made, namely:

AMENDMENT

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

CHIEF SECRETARY
GOVERNMENT OF THE KHYBER PAKHTUNKHWA

ENCL: NO & EVEN DATE

Copy is forwarded to:-

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

10/18/2020
267

Wardah Latif
(WARDAH LATIF)
DEPUTY SECRETARY (POLICY)

Attd
24

(17)

Amme sure "B"

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GOVERNMENT OF
KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
(REGULATION WINGS)

NOTIFICATION

Dated Peshawar, 06-08-2020

No.SO(Policy)E&AD/1-3/2020: In exercise of the powers conferred by the section 26 of the Khyber Pakhtunkhwa Civil Servant Act 1973 (Khyber Pakhtunkhwa Act. No XVIII) OF THE Chief Minister of Khyber Pakhtunkhwa is please to direct that in the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion, Transfer) Rules 1989, further amendment shall be made, namely.

ADJUSTMENT

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

CHIEF SECRETARY

GOVERNMENT OF KHYBER PAKHTUNKHWA

Encls: of Even No. & Date:

Copy of the above is forwarded to the,

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, Govt of Khyber Pakhtunkhwa
5. The Principal Secretary to Chief Minister, Govt of 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. All Section Officers in Establishment & Administration Department
14. The Section Officer (Admn), Administration Department with the request to arrange gazette copies.
15. The Caretaker, Administration Department

11/11/11
11/11/11

21.8.11
06.3

11/11/11

Special Officer (Policy)

Special Officer (Policy)

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

Copy forwarded to the:
Engg. Officer (in & date)

11/11/11

Further, those 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 Peshawar Civil Services (Efficiency & Discipline) Rules, 1977.

The basic rationale behind the deletion of the third rule is aimed at preventing a provision which would lead to force promotion in case of vacancy or short fall in recruitment for such posts by filling in a single selective position or in respect of those who lead to force promotion. Therefore, it is obligatory upon every official to accept promotion in every condition.

I am directed to refer to your letter No. SUPPLY-1374/2011 dated 18.04.2011 on the subject noted above and to state that Sub-Rule (3) of Rules of Khyber Peshawar Civil Services (Appointment, Promotion and Transfer) 1977 shall stand deleted with effect from the date 01.01.2011.

GUJARAT RESERVATION DEPARTMENT
GUJARAT PARLIAMENTARY DEPARTMENT
GUJARAT CIVIL SERVICES (APPOINTMENT, PROMOTION AND TRANSFER) RULES, 1977

The Government of Khyber Peshawar
Secretary & Secretary (Policy) Department



GOVERNMENT OF KHYBER PESHAWAR
ESTABLISHMENT DEPARTMENT
No. SO (Policy) HR-III-2020
Dated Peshawar the June 06, 2013

(18)

Amir Khan

B

18

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GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
NO. SO(Policy)B&AD/-3/2000
Dated Peshawar the June 05. 2023

To

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

Subject:

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

Dear Sir,

I am directed to refer to your letter No. SO (Priniamay.M)E&SED/2-2/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 (Appointments, Promotions, and Transfer) Rules, 1989, stand deleted vide this department retention letter dated 6-8-2020, thus no provision exist to decline or forgo promotion.

2. The Basic rationale behind the deletion of abid Rule is aimed at preventing Civil Servant from temptation for illicit gain by sticking to a single lucrative post/position or to prevent those who can to forgo promotion to availed posting/transfer or 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 Pakhtunkhwa Civil Servant (Efficiency & discipline) rule 2011, please.

Yours Faithfully

(Issa Muhammad Khan)

Section Officer (Policy)

Endstt: 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.

Attended
23/5/23

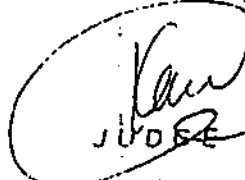

19

ANNEXURE

"D"

PESHAWAR HIGH COURT, ABBOTTABAD BENCH.

FORM OF ORDER SHEET

Date of Order of Proceedings	Order or other Proceedings with Signature of Judge (s)
1	2
30.01.2024	<p data-bbox="486 471 742 504"><u>W.P.No.973-A/2023.</u></p> <p data-bbox="486 517 1209 580">Present: Mr. Muhammad Arshad Khan Tanoli, Advocate for petitioners</p> <p data-bbox="486 675 1212 904">... <u>KAMRAN HAYAT MIANKHEL, J.</u> Learned counsel for petitioners stated that he under the instructions of his clients does not press this writ petition. Dismissed being not pressed.</p> <div data-bbox="973 930 1300 1286" style="text-align: right;">  JUDGE  JUDGE </div>

19

Arshad "D"

BETTER COPY

PESHAWAR HIGH COURT, ABBOTTABAD BENCH.
FORM OF ORDER SHEE

Date of order of proceedings	Order of the proceedings with signature of Judge (s)
1	2
30-1-2024	<p><u>W.P NO. 973-A/2023</u></p> <p>Present: M/S Muhammad Arshad Khan Tanoli and Muhammad Ibrahim Khan, Advocate for Petitioners.</p> <p><u>KAMRAN HAYAT MIANKHEL, J-</u> Learned counsel for Petitioners stated that they under the instruction of their clients do not press this writ Petition. Dismissed being not pressed.</p> <p>JUDGE</p> <p>JUDGE</p> <p><i>Arshad</i></p> <p><i>[Signature]</i></p> <p>23/5/24</p>

(20)

PESHAWAR HIGH COURT, ABBOTTABAD BENCH.
FORM OF ORDER SHEET

Date of Order of Proceedings

30.01.2024

Order or other Proceedings with Signature of Judge (s)

2

W.P.No.1101-A/2023.

Present: M/S Muhammad Arshad Khan Tanoli and
Muhammad Ibrahim Khan, Advocate for
petitioners.

...

KAMRAN HAYAT MIANKHEL, J. Learned counsel for
petitioners stated that they under the instructions of their
clients do not press this writ petition. Dismissed being not
pressed.


JUDGE


JUDGE

20

BETTER COPY

PESHAWAR HIGH COURT, ABBOTTABAD BENCH.

FORM OF ORDER SHEET

Date of order of proceedings	Order of the proceedings with signature of Judge (s)
1	2
30-1-2024	<p><u>W.P NO. 1101-A/2023</u></p> <p>Present: M/S Muhammad Arshad Khan Tanoli and Muhammad Ibrahim Khan, Advocate for Petitioners.</p> <p><u>KAMRAN HAYAT MIANKHEL, J-</u> Learned counsel for Petitioners stated that they under the instruction of their clients do not press this writ Petition. Dismissed being not pressed.</p> <p>JUDGE</p> <p>JUDGE</p>

Attested

27/05/24

24



**OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE)
ABBOTTABAD**

No. 7572 Dated 23/10/2024

Phone No. 0992-342533-342324

AUTHORITY LETTER

Mr Zahid Gul Khan legal representative, office of undersigned is hereby authorised to attend, brief and follow the instant **Service Appeal No. 243/2024** “**Amrazia Bagum VS Govt of KPK & Others**”, before the KPK Service Tribunal Peshawar fixed on 25-10-2024 on behalf of the respondents No.2, 3, 4, & 6.

**MST: AYESHA SAEED
DISTRICT EDUCATION OFFICER
(FEMALE) ABBOTTABAD**

(Handwritten signature) (RESPONDENT NO: 6)