


FORM OF ORDER SHEET

Court of _____

Appeal No. 2472/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	18/11/2024	<p>The appeal of Mst. Shaheen Akhtar re-filed today by registered post through Tahir Sajjad Advocate. It is fixed for preliminary hearing before touring Single Bench at A.Abad on 27.11.2024. Counsel for the appellant has been informed telephonically.</p> <p>By order of the Chairman  REGISTRAR</p>

The appeal of Mst. Shaheen Akhtar received today on 04.11 2024 by registered post, is incomplete for the following reason and is being returned to the appellant's counsel for completion and resubmission within 15 days:

1. Address of appellant is incomplete be completed according to the rule-6 of the Khyber Pakhtunkhwa Service Tribunal rules 1974.
2. Appeal has not been flagged/marked with annexures marks.
3. The copy of seniority list attached to the appeal has no date or year. Please attach the seniority list that includes the date and year.

No. 1025 /Inst./2024/KPST,

Dt. 4/11 /2024.

Amratilloh
ADDITIONAL REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Tahir Sajid Adv.
High Court at Mansehra.

Resubmitted today by ~~court~~ Registered post
No
18/11/2024

BEFORE THE SERVICE TRIBUNAL

KHYBER PAKHTUNKHWA

S.ANO:-2472/24

Shaheen Akhtar.....Appellant

Versus

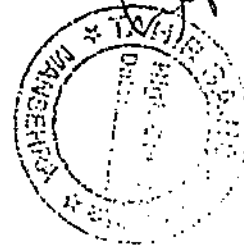
Secretary to Government of Khyber Pakhtunkhwa and
others.....Respondents

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Dated: 02.11.2024

ADVOCATE



BEFORE THE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA

Service Appeal No. 2472/2024

Shaheen Akhtar son of Sardar Ghulam Jellani SPST BPS-14 at GPS

....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
- 4) District Education Officer (DEO), Mansehra.....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. FURTHERMORE ON THE CONTINUATION RESPONDENT NO. 4 ORDERED THAT APPLICANT TO SUBMIT HIS FILE FOR PROMOTION AGAINST C.T POST (BPS-15) VIDE LETTER NO. 8151 DATED 25.09.2024 WHILE BOTH THE POSTS PSHT & C.T CARRY EQUAL BPS-15.

PRAYER:

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 AND LETTER NO. 8151

DATED 25.09.2024 BY THE RESPONDENT NO. 4 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 06th, 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, on the continuation of above procedure the respondent no. 4 ordered the appellant to submit his file for promotion against C.T post while it is pertinent to mention here that in past employee forego their promotion to the post of C.T BPS-15 on the ground that both the posts i.e. PHST and C.T are carrying BPS-15 while the SST scale is in BPS-16 and under the new rule 20% quota has also been reserved for PHST. Now under the impugned letters of the respondents opted for their promotion to BPS-15 they would be placed at the bottom of seniority list of the C.T and since, the appellant is in the last decade of their service carrier therefore, it would be considered for promotion to the SST BPS-16 under the 20% quota.

(Copy of order of respondent No. 4 dated 25.09.2024 annexed as Annexure "J")

- 12) 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.

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, the appellant already forego the post of PHST in 2017 (BPS-15) 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 and on continuation order of respondent No. 4 dated 25.09.2024 are 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 and order dated 25.09.2024 would not be able to serve in the Department and which shall amount to the snatching of bread and butter of the poor employees.
- G) That, it is also pertinent to mention here that both the posts i.e PHST and C.T are having same BPS-15 therefore, it cannot be termed promotion PHST to C.T but merely cadre change. There is no financial benefit to the PHST on their adjustment as C.T. Some employees/Civil Servants were suffering from swear medical ailment and facing acute domestic issues cannot avail promotion with transfer in for-flunk areas/hard areas for the aforesaid reasons.

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.

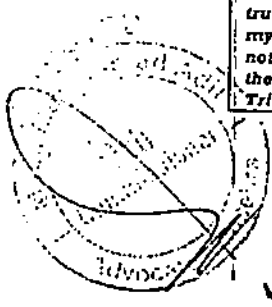
Dated: 02.11.2024

[Signature]
Appellant

Through: -

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.

Tahir Sajid Advocate
High Court, District
Courts, Mansehra



11/25

[Signature]



**BEFORE THE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA**

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

Shaheen Akhtar.....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: 02.11.2024

[Signature]

Appellant

Through: -

Tahir Sajid Advocate
High Court, District
Courts, Mansehra

[Signature]

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

[Signature]



1/11
24

(8)

ANN: A

OFFICE OF THE DISTRICT EDUCATION OFFICER(MALE) PRIMARY MANSEHRA.

OFFICE ORDER NO. 20

APPOINTMENT

DATED MANSEHRA THE 9/5/1992.

Consequent upon their selection on merit, the following, untrained PT candidates are hereby appointed in BP-2-Rs.1095/PM fixed plus usual allowances as admissible under the rules with effect from the date of their taking over charge against the newly created posts in the Mosque Schools given against their names each in the interest of public service.

S. NO.	Name of Candidate, Father's Name and Residence.	Name of Mosque School where Apptt;	Slam # P.S.
1.	Mohd Manzoor S/O Malik Abdullah Jan R/O Banni Madra.	Mosque School Moh; Barkot (newly created P.S.)	"
2.	Kasif Waseem S/O Jahanzeb R/O Kalhan.	Mosque School Dara Moh; Ghulam Mustafa.	"
3.	Jahanzeb S/O Mansoor R/O Anisra.	Mosque School Moh; Aziz Abad	"
4.	Malik Mazhar Jalal S/O Malik Abdul Jalal R/O Khawai	Mosque School Doodkot Saida.	"
5.	Mohd Nigam S/O Wali Mohammad	Mosque School Talson	"
6.	Munir Ahmad S/O Samundar R/O Behali	Mosque School Kandi Bissian	"
7.	Mohd Suhail S/O Mohd Raza	Mosque School Moh; Uppa	"
8.	Sher Afzal S/O Mir Afzal R/O Mandian Kotkay	Mosque School Tari Noghazi	"
9.	Malik Waheed S/O Mir Mohammad	Mosque School Bahadrian (Khatra Goh)	"
10.	Ejaz Ahmad S/O Mohd Iqbal R/O Behali	Mosque School Ismailabad (Attarshisha)	"
11.	Ajmal Hussain S/O Ghulam Rehman R/O Arab Khan.	Mosque School Suddasar.	"
12.	Mohd Khalid S/O Abdul Khaliq R/O Barerkote.	Mosque School Katha Bissain.	"
13.	Naveed Aslam S/O Mohd Aslam R/O Dhanfri.	Mosque School Char-Gum-Baidra.	"
14.	Abdul Shakoor S/O Ghulam Nabi R/O Jabba Manoor	Mosque School Larri Bela (Kaghan)	"
15.	Mohd Furqan S/O Fazal Haq R/O Joscha.	Mosque School Jandrukian (Jarred)	"
16.	Shaheen Akhtar S/O Sardar Ghulam Jailani R/O Ghanool.	Mosque School Poonja Village.	"
17.	Sultan Mohd Rabbani R/O Mian Ghulam Chamer Kaghan (B. Kote)	Mosque School Pull Hassa	"
18.	///////		

Cont; On Page... (2).....

Attested

(9)

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



Personal Information of Mr SHAHEEN AKHTAR d/w/s of SARDAR GIULAM JALLANI

Personnel Number: 00222503 CNIC: 1350112900897 NTN:
Date of Birth: 25.01.1969 Entry into Govt. Service: 29.06.1992 Length of Service: 32 Years 02 Months 004 Days

Employment Category: Active Temporary
Designation: SENIOR PRIMARY SCHOOL TEA 80003206-DISTRICT GOVERNMENT KHYBE
DDO Code: MA6145-Manshra
Payroll Section: 001 GPF Section: 001 Cash Center: 2
GPF A/C No: EDUMA009346 Interest Applied: Yes GPF Balance: 882,566.00
Vendor Number: -
Pay and Allowances: Pay scale: BPS For - 2022 Pay Scale Type: Civil BPS: 14 Pay Stage: 24

Wage type		Amount	Wage type		Amount
0001	Basic Pay	64,290.00	1001	House Rent Allowance 45%	3,321.00
1210	Convey Allowance 2005	2,856.00	1300	Medical Allowance	1,500.00
2148	15% Adhoc Relief All-2013	827.00	2199	Adhoc Relief Allow @10%	575.00
2116	Teaching Allowance 2021	3,036.00	2341	Dispr. Rel All 15% 2022KP	6,138.00
2147	Adhoc Rel All 15% 2013(PS17)	6,138.00	2378	Adhoc Relief All 2024 15%	11,893.00
2393	Adhoc Relief All 2024 25%	16,072.00			0.00

Deductions - General

Wage type		Amount	Wage type		Amount
3014	GPF Subscription	-3,900.00	3501	Benevolent Fund	-1,200.00
3609	Income Tax	-4,873.00	3990	Emp.Edu. Fund KPK	-135.00
4004	R. Benefits & Death Comp:	-600.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	250,000.00	-6,945.00	83,320.00

Deductions - Income Tax

Payable: 77,963.40 Recovered till August-2024: 9,746.00 Exempted: 19490.60 Recoverable: 48,726.80
Gross Pay (Rs.): 126,646.00 Deductions: (Rs.): -17,653.00 Net Pay: (Rs.): 108,993.00

Payee Name: SHAHEEN AKHTAR
Account Number: 0010023644690018
Bank Details: ALLIED BANK LIMITED, 250003 BALAKOT BALAKOT, MANSEHRA

Leaves: Opening Balance: Availed: Earned: Balance:

Permanent Address: MANSEHRA
City: MANSEHRA Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official
Temp. Address: Email:
City:

Attested
[Signature]

(50399005/06.09.2024/09-27:11) 2) All amounts are in Pak Rupees 3) Errors & omissions excepted

B

GOVERNMENT OF
KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
(REGULATION WING)

NOTIFICATION

Dated Peshawar, the 06/8/2020

IN EXERCISE OF THE POWERS conferred by section 25 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 5, sub-rule (5) shall be deleted.

CHIEF SECRETARY
GOVERNMENT OF THE KHYBER PAKHTUNKHWA

SEND ON EVEN DATE

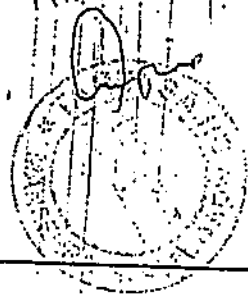
Copy forwarded to:-

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. Heads of Attached Departments in Khyber Pakhtunkhwa.
8. All Deputy Commissioners in Khyber Pakhtunkhwa.
9. The Registrar, Peshawar High Court, Peshawar.
10. The Registrar, Khyber Pakhtunkhwa Service Tribunal, Peshawar.
11. The Secretary, Khyber Pakhtunkhwa Public Service Commission, Peshawar.
12. The Deputy Director (IT), E&A Department.
13. All Section Officers in Establishment & Administration Department.
14. The Section Officer (Admn), Administration Department with the request to arrange 20 gazette copies.
15. The Caretaker, Administration Department.

(Signature)
(WAJDAH LATIF)
DEPUTY SECRETARY (POLICY)

Handwritten signature

Attested



(11)

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): 2 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.

(WAJDAH LATIF)
DEPUTY SECRETARY (POLICY)

Attested
Dy Secy



GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
No. 50(Policy)11&AD1-3/2020
Dated Peshawar the June 06, 2023

62

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

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

Dear Sir,
I am directed in refer to your letter No. 30(Policy-MY)11&AD1-3/2020-
2/Appointment/2023 dated 10.04.2023 on the subject noted above and to state that Sub-Rule
(2) of Rule-7 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer)
Rules, 1989 stands deleted vide this department notification dated 06.03.2020; thus, no
provision exists to decline or forgo promotion.

2. The basic rationale behind the deletion of this sub rule is aimed at preventing a
civil servant from temptation for illicit gain 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,

(Isha Nishat) (Sign)
Secretary (Policy)

15/6
17/6

Handwritten signature

Encl. Of every No. & date

Copy forwarded to the:-

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

Handwritten signature

Deputy Secretary (Policy)

Handwritten signature

Handwritten notes and dates: 21.6.23

Attested
Handwritten signature



12A

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)

A Hoster

Endst: of even No & date

(13)

No 50 (Primary-M)/E&SED/2-6/2023
Dated Peshawar the June 25th 2023

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

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

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. 50 (Policy)E&AD/1-3/2020 dated 06 June, 2023 and to state
that the subject meeting is to be held on 06 July, 2023 at 11:00 AM in this department under the
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

(MILLAMBAH ESTAB)
SECTION OFFICER (PRIMARY MALE)

Copy forwarded to the:

1. PC in Secretary, E&SE Department Khyber Pakhtunkhwa.

SECTION OFFICER (PRIMARY MALE)

Attest
A. M.

(14)

ASST. SEC. GEN.

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

No. SO (Primary-M) (E&SED/2-6/2023
Dated Peshawar the June 26th 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 herewith
a letter of Establishment Department letter No. SO (Policy)E&AD/1-3/2020 dated
06 June, 2023 and to state that the subject meeting is to be held on 06 July, 2023 at
11:00 AM in this department under the Chairmanship of Additional Secretary (E&AD)
E&SE Department in his office.

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

Encl: AA

[Handwritten Signature]

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

Copy forwarded to the:

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

[Handwritten Signature]

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

Attest

[Handwritten Signature]





MINUTE OF THE MEETING REGARDING APPLICATION SUBMITTED BY MR AZIZ ULLAH PROVINCIAL PRESIDENT ALL PRIMARY TEACHERS ASSOCIATION KHYBER PAKHTUNKHWA REGARDING DELETION OF RULE 215 IN THE CIVIL SERVANT (APPOINTMENT, PROMOTION & TRANSFER RULE 1999).

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

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

1. 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.

2. 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
EP&SE Department

Provincial President
All Primary Teachers Association
Khyber Pakhtunkhwa

(Mr. Hafiqat Ullah)
General Secretary APTA
Peshawar

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

(Abdullah)

Additional Secretary (Establishment)

Attended
Aziz





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


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


Sl. 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. 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-1
E&SE Department


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

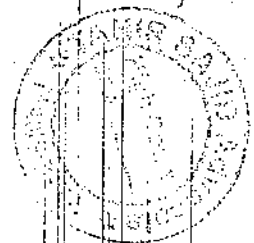

(Mr. Razaqat Ullah)
General Secretary APTA
Peshawar


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

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

Attended







No. 8145 / P. No. 34/SST/AD/General Cases. Dated 21-7-2023
Phone: 091-9223344 Email: estab@info@kpk.gov.pk

To
The Section Officer (Primary-Male),
Elementary & Secondary Education Department,
Khyber Pakhtunkhwa Peshawar.

Subject - MINUTES OF THE MEETING

Dear Sir,
I am directed to refer to the letter No. SO (Primary-M) E&SED/3-1/ G. Misc/Ministry of the meeting/PS772023 dated 10-07-2023 on the subject cited above and in present brief history about the background of the case as under:

- That Government of Khyber Pakhtunkhwa Establishment Department (Regulation Wing) dated Rule 7(5) in the Civil Servants (Appointment, promotion & Transfer Rules 1989) vide notification No. Na. SO (P) (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 16-02-2023.
 - Now it is obligatory upon the civil servant to accept promotion in every condition.
 - It is the prerogative of the civil servant to either accept or turn down the offer of promotion.
 - That your good office forwarded the same to the quarter concerned vide letter No. SO (Primary-M) E&SED/3-1/Appointment/2023 for necessary guidance.
 - That the Government of Khyber Pakhtunkhwa Establishment Department (Regulation Wing) vide letter No. SO (Policy) E&AD/1-3/2020 dated 6-06-2020 categorically stated that there exists no provision to decline or forgo promotion. It is obligatory upon every civil servant to accept promotion under every condition.
 - The same was received by this office from your good office vide letter No. SO (Primary-M) E&SED/3-1/Appointment/2023 dated 12-06-2023.
 - That, in the light of the minutes of meeting dated 6-07-2023 held under the Chairmanship of Hon. Additional Secretary Establishment at his office this office has been asked for submission of consolidated case.
- In view of the above, this office is of considered opinion that the deletion of Rule 7(5) have affected negatively a huge numbers of Female Teachers. Thus it is proposed that Teachers below DP-16 may be exempted of implications of the amendment in the rules laid provided they submit their written refusal prior to conduction of the meeting of Departmental Promotion Committee.

The case is submitted for perusal and necessary actions please.

(Signature)
Assistant Director (Estab M-1)
Elementary & Secondary Education
Khyber Pakhtunkhwa

- Encls: No. _____ Copy of the above is to:-
1. PA to Director Local Directorate.
 2. Master Copy

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

AHestaf

Directorate of Elementary & Secondary Education, KPK

To,

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

Peshawar
(21-7-2023)

Subject: Minutes of Meeting

Dear Sir,

I am directed to refer to letter no (SO Primary-M) E&SED/S-1/G.Misc/Minutes of meeting/PSI/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) I-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 I-3/2020 dated 6-06-2023 categorically stated that there 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 please.

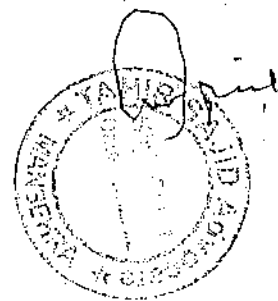
and necessary actions

Copy of the above to;

1. PA to director Local Directorate
2. Master Copy

Assistant Director
Elementary & Secondary
Education, Khyber Pakhtunkhwa

Attested





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

No. SO(Priamry-M)E&SE/2-2/Appointment-Rule /2023
Peshawar, Dated 23rd August, 2023

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

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

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

2. In this connection it is submitted that in some cases lady teacher of primary
level who avail such promotions have to face serious inconvenience while they have to
perform duties in the remotest station with no residential or transport facility. Most of
them are married with kids and elder father or mother-in-law who need care. In such
cases, there are negative effects on service delivery.

3. In view of the above, the said amendment may be reconsidered to the
extent of lady teacher in primary schools.

SECTION OFFICER (PRIMARY MALE)

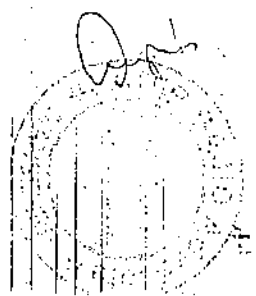
Copy forwarded to the:

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

SECTION OFFICER (PRIMARY MALE)
28/8/23

Scanned with CamScanner

Attested



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(S) IN THE
KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT,
PROMOTION AND TRANSFER) RULES, 1939.

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

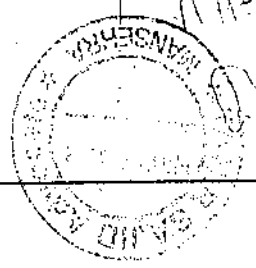
Yours faithfully,

Section Officer (Policy)

Encls. Of even No & date

Copy forwarded to:-

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



GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
No. 50(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. 50(Primary-M)/ER&ED/2-2/Appointment-
Rule/2023 dated 23.08.2023 on the subject noted above and to state that necessary
guidance has already been tendered to your good office vide this department letter of even
No. dated 06.06.2023 (copy enclosed).

Yours faithfully,

Section Officer (Policy)

Encl. Of Even No & date

Copy forwarded to the:-

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

Section Officer (Policy)

Attest

[Signature]



خدمت بناب سیکرٹری ایجوکیشن خیبر پختونخواہ

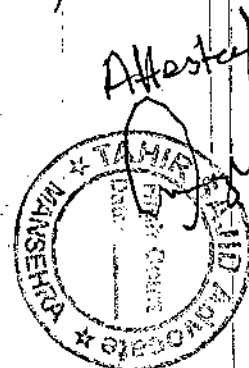
اپیل! عرض ہے کہ گورنمنٹ آف خیبر پختونخواہ کی جانب سے جو لازمی پروویشن کا حکم نامہ جاری ہوا وہ ایک متنازع نوٹیفکیشن ہے جس سے ہمیں درج ذیل تحفظات ہیں۔

- 1- PSHT پہلے سے سکین 15 میں ذمہ داریاں سرانجام دے رہے ہیں۔
- اپیل دہندہ کی عمر 45 سال ہے۔ اگر وہ سی ٹی پوسٹ لینا چاہیں۔ تو سکین 15 ہی میں آئیں گے۔ اور سینارٹی متاثر ہو کر بارٹم میں چلے جائیں گے۔ حکم نقصان ہے کہ وہ SST پوسٹ سکین 16 سے شروع ہو جائیں گے۔
- 2- یہ کہ جبراً ہمیں آٹا پوسٹ منظور نہیں ہے۔ کیونکہ ایک سال کے اندر اندر PSHT، SST پوسٹ ہر پروویشن ہونے والے ہیں۔
- 3- سالم حکومت نے پہلے سے PSHT/SPST اور PST کو آپ گریڈ کیا ہے۔ جو کہ 07-23-01 سے نافذ العمل ہے۔ لیکن مالی کمی کی وجہ سے نا حال تاخیر کا شکار ہیں۔
- 4- یہ کہ سکین 15 سے 15 میں جانا کہاں کا پروویشن ہے۔ یہ تو طرف اور طرف کی طرف تبدیل ہو جاتا ہے۔ اور ہمارا مطالبہ پروویشن آپ گریڈیشن ہے۔

لہذا ہم اساتذہ حکومت خیبر پختونخواہ سے مطالبہ کرتے ہیں کہ مذکورہ نوٹیفکیشن کو منسوخ کریں۔ اور اساتذہ کی بے پنی کو ختم کریں۔ ورنہ ہم عدالت میں حق بجانب ہوں گے۔

شاہین اختر
GPS، مہلا مال 07/02
2024

AR




(24)

ANN: I

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MANSEHRA

SENIORITY LIST OF SPSTs DISTRICT (MALE) MANSEHRA

S.L.No	O.SLN	School/Place	Name of Teacher	FName	P. No	Acade	Profes	Dm	DOB	Date of Promotio	DO_Reg_A ppt
1	182	GPS JABBORI	JEHANZEB	MOHAMMAD AYUB		FA	PTC/CT		2-Sep-65	25-02-13	09-08-85
2	507	GPS CHITTI DHERI	M SAEED	RAFIQUE REHMAN	222244	FA	PTC		15-04-67	25-02-13	6/27/1987
3	934	GPS SHER PUR	IGUL NAWAZ	ABDUL MANAN	221612	FA	PTC		20-04-66	25-02-13	11-10-88
4	1062	GPS MAIRA JIA	MUHAMMAD YOUNAS	MUHAMMAD ANSAR	223124	FA	PTC		08-01-71	25-02-13	12/2/1990
5	1458	GPS GARHI HABIB ULLAH	ABDUL RA SHID	ALI GOHAR KHAN	338755	FA	PTC		01-07-71	25-02-13	20/10/1993
6	1466	GPS BARAR KOT	MUHAMMAD ARSHAD	SHAR ZAMAN	225881	FA	PTC		20-07-75	25-02-13	25/12/1993
7	1535	GPS QOTAR	MUHAMMAD SADIQ	GHULAM QADIR	222241	FA	PTC		15-10-63	25-02-13	25/12/1993
8	1568	GPS BAFFA MAIRA NO.2	MUHAMMAD SADIQ	Abdul Qayyum	217845	BA	PTC		26-02-65	25-02-13	29/05/1994
9	1589	GPS BANNI KARNOL	ABDUR RA SHEED	Rehmat Ullah	222521	FA	PTC		01-04-70	25-02-13	29/05/1994
10	1819	GPS POTHIA	MUHAMMAD TUFAIL	ABDUL GHANI	225045	BA	PTC	2nd	30-04-63	25-02-13	14/11/1994
11	1620	GPS KHAN DHERI	CHAN ZEE	KHAN WALI	227235	BA	PTC/B.ED		01/01/1970	25-02-13	14/11/1994
12	1822	GPS HAFEEZ BANDI	SASHIR AHMAD	GHULAM HUSSAIN	224232	FA	PTC		01-12-73	25-02-13	14/11/1994
13	1824	GPS JAGIR	MAZHAR ULL HAQ	AFZAL HAQ	224989	BA	PTC/CT		10-03-71	25-02-13	14/11/1994
14	1848	GPS BHATIAN	MUHAMMAD RAFIQUE	GHULAM NABI		BA	PTC/CT/B.ED	2nd	04-04-72	25-02-13	15/11/1994
15	1728	GPS JHANGAN	MUHAMMAD NAHEEM	NISAR KHAN	225782	FA	PTC		28-12-63	25-02-13	09/01/1995
16	1727	GPS MAKRIHA MUSTAFA SHAH	SALEEM AHMAD	Mohammad Yaqoob	224308	FA	PTC		18-02-70	25-02-13	09/01/1995
17	1751	GPS MAIRA SYATI ASAD	MUHAMMAD HANIF	GHulam Jilani	223858	FA	PTC		09-04-72	25-02-13	25/05/1995
18	1754	GPS SUGH DAR	ABDUL WAHEED	Mian Abdul Jilil	223078	FA	PTC		28-02-69	25-02-13	24/08/1995
19	1762	GPS BAFFA KHLRD	SYED EJAZ HUSSAIN SH	SYED MADAD SHAH	224258	BA	PTC		10-04-63	25-02-13	26/03/1995
20	1773	GPS TRANGRI PAIN	IFAZAL E RAJBI	ALLAH DAAD	224961	FA	PTC		05-03-74	25-02-13	26/08/1995
21	1811	GPS TRANKA	MUHAMMAD TARIQ	SHAR ZAMAN	224428	MA	PTC/CT/B.ED/M.ED	2nd	15-10-70	25-02-13	20/01/1996
22	1813	GPS SHOHAL NAJAF KHAN	KARAMAT HUSSAIN	M.HUSSAIN KHAN	223643	MA	PTC/CT/B.ED/M.ED	3rd	06-02-72	25-02-13	20/01/1996
23	1828	GPS ROM	AFTAB AHMAD	MOHABBAT KHAN	226115	FA	PTC		10-02-74	25-02-13	30/01/1996
24	1839	GPS KHARIAN	ZAKIR HUSSAIN	Laal	225204	FA	PTC		15-02-73	25-02-13	02/03/1996
25	1840	GPS DARRAH BALAKOT	ABDUR REHMAN	Abdullah	225288	BA	PTC/B.ED		05-03-73	25-02-13	01/04/1996
26	1848	GPS JABRI MANSEHRA NO.1	M SAJID	ASIF Jah	218137	FA	PTC		29-04-63	25-02-13	11-05-96
27	1886	GPS BAILA TRANGRI	IGUL ISLAM	FAQIR MUHAMMAD	223941	FA	PTC		09-03-72	25-02-13	12-01-85
28	1901	GPS GARHI HABIB ULLAH	ARSHAD ZAYAN KHAN	GUL ZAMAN	217920	FA	PTC		08-04-68	25-02-13	25/05/1996
29	1911	GMPS QAZI ABAD (HAWSHIRIAN)	RAFAQAAT HUSSAIN	UMER KHITAB	218340	FA	PTC		11-02-73	25-02-13	25/05/1996
30	1922	GPS TALHATTA	ISHAKEE AHMED	SAIN GUL	224384	MA	PTC/B.ED	2nd	08-04-72	25-02-13	09/07/1998
31	1924	GPS MASWAL	MUHAMMAD RAFIQ	SAID MUHAMMAD	221653	FA	PTC		01-02-67	25-02-13	10/07/1996
32	1935	GPS BHATAY (MENTAL)	GOUDAR HUSSAIN	GHULAM YAKHYA	226414	FA	PTC		07-01-78	25-02-13	10/07/1996
33	1941	GPS BANPHORA	MUHAMMAD SADIQ	Muhammad Yaqub	223682	FA	PTC		03-03-71	25-02-13	30/07/1996
34	1952	GPS KHAKI	MUKHTAR AHMAD	SHAHJAHAN	227469	FA	PTC		13-08-67	25-02-13	10/10/1996
35	1953	GPS SARWAJ	ISAEED UR REHMAN	MUHAMMAD AYUB	226398	BA	PTC/B.ED		15-07-1972	25-02-13	10-12-96
36	1957	GPS BAFFA MAIRA NO.3	MUHAMMAD ABIO	MUFTI GHULAM MUSTAFA	219810	FA	PTC		24-04-73	25-02-13	12-11-96
37	1991	GPS GHORAY PHARR	MUMTAZ AHMED	ABDUR REHMAN	224891	BA	PTC		01-04-71	25-02-13	30/11/1996
38	1998	GPS TALHATTA	TARIQ SAEEED	SAEEED UR REHMAN	218278	FA	PTC		26-10-63	25-02-13	01/12/1996
39	2018	GPS MORI SODHAL	ISAEED UR REHMAN	Muhammad Irfan	218077	FA	PTC		10-03-67	25-02-13	13/12/1996
40	2052	GPS PHAGLA	ISHAKEE AKHTAR	SARDAR GHULAM JELANI	222503	BSC	B.ED		25-01-63	25-02-13	23-06-92
41	2068	GPS HOTAR TARRA	ABDUR REHMAN	GHULI AY SARWAR	224421	FA	PTC		10-03-73	25-02-13	13/05/1997
42	2080	GPS SERI MAHAR 3	QAZI JAWAHIR AHMAD	QAZI ABDUL JABBAR	219768	FA	PTC		05-01-73	25-02-13	26/06/1997
43	2096	GPS HARFALA NO.2	MUHAMMAD HAROON	KHAWAJA MOHAMMAD KHAN	227111	FA	PTC		04-04-75	25-02-13	27/06/1997

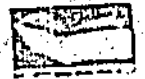
A.H. Khan


25

Annex J

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MANSHEHRA

Phone No. 0321-3211111
E-mail Address: deomanshehra@kpk.gov.pk
Fax No. 0321-3211111



No. 2181 Dated 25/9/2024

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

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

Reference: 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 PSITs to CT/DM & PET held on 26-03-2024 in the office of DDO (M) Manshehra vide Endst. No. 2608 dated 25-03-2024 that all PSITs having BA with CT/DM/PET are bound to submit their promotion files.

As per letter of Government of Khyber Pakhtunkhwa Establishment Department No. S&P Policy J.A/AD/1-3/2020 Dated Peshawar the June 06, 2023. Affidavit regarding forgo is not acceptable, therefore all PSIT 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. S&P Policy J.A/AD/1-3/2020 Dated Peshawar the June 06, 2023.

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

DISTRICT EDUCATION OFFICER
(MALE) MANSHEHRA

Encl. No. 2152-53 Dated 25/9/2024

- Copy for information to the:-
- 1. The Director E&SE KPK Peshawar.
 - 2. The Deputy Commissioner Manshehra
 - 3. Office Copy.

BY: DISTRICT EDUCATION OFFICER
(MALE) MANSHEHRA

Attested

DBAM No. _____

338

BC No. _____

10 - 24 5 7

Name of Advocate _____

طاہر ساجد

S.No _____

52993

Fee Rs. 200/-



2024-25

 DISTRICT BAR ASSOCIATION
 Manshera
 SECRETARY

وکالت نامہ

بعدالت: جناب سروس ٹریبیونل لٹاؤر KPK
 عنوان: شہادین اختر
 منجانب: اسٹانٹ
 بنام: سیکرٹری لوٹ حکومت KPK
 نوعیت مقدمہ: سروس اپیل

باعث تحریر آنکہ

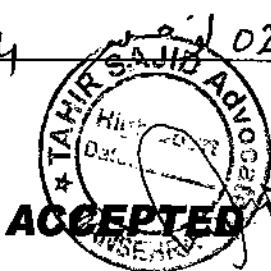
دریں مقدمہ عنوان بالا میں اپنی طرف سے برائے پیروی و جواب دہی بمقام اسٹانٹ اور کے لئے

طاہر ساجد ریڈ و کیٹ ہائی کورٹ

کو بدیں شرائط و کیل 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 ہوا اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ میرے خلاف ہو گیا تو وکیل موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل موصوف صدر مقام کچہری کے علاوہ کسی اور جگہ کچہری کے مقررہ اوقات سے پہلے یا بروز تعطیل پیروی کرنے کے مجاز نہ ہوں گے۔ اگر مقدمہ کچہری کے علاوہ کسی اور جگہ سماعت ہو 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 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 کا روپیہ وصول کرنے اور رسید دینے اور داخل کرنے کا ہر قسم کا بیان دینے اور سپر دتاشی و راضی نامہ و دستبرداری و اقبال دعویٰ کا اختیار بھی ہوگا بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم امتناعی یا فیصلہ قبل از ڈگری اجراء ڈگری بھی وکیل موصوف کو بشرط ادا کی علیحدہ محتات ادا کرنے کا مجاز ہوگا اور بصورت ضرورت بدوران 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 پیروی نہ کریں اور ایسی حالت میں میرا مطالبہ وکیل موصوف کے برخلاف نہیں ہوگا مجھے کل ساختہ پر داخستہ 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۔

2024

02 مورخہ



شہادین اختر ولد سردار غلام صیلائی مکاتبت قانون فیصل بالکونٹہ ضلع مانسہرہ
 اسٹانٹ