


FORM OF ORDER SHEET

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

**Appeal No.** 2473/2024

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. Muhammad Mashal 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</p> <p> REGISTRAR</p>

The appeal of Mr. Muhammad Mashal 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. Appeal has not been flagged/marked with annexures marks.

*not removed* ② 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. 1029 /Inst./2024/KPST,

Dt. 04/11 /2024.

*Amalilloh*  
ADDITIONAL REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Tahir Sajid Adv.  
High Court at Mansehra.

*Refiled by registered post on 18/11/2024*  
*18/11/2024*

**BEFORE THE SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA**

S.No: 2473/24

Muhammad Mashal.....Appellant

Versus

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

**INDEX**

S.No	Description of documents	Annexure	Page#
1.	Appeal and verification	-	1 to 6
2.	Application for suspension	-	7
3.	Copies of first appointment letter and monthly salary account.	"A"	8 to 10
4.	Copy of notification No. SO(Policy)EV AD/1-3/2020	"B"	11, 12
5.	Copy of impugned letter dated June 6 <sup>th</sup> , 2023	"C"	13 to 16
6.	Copy of minutes of meeting dated 08.07.2023	"D"	17 to 20
7.	Copy of letter dated 23.08.2023	"E"	21
8.	Copies of impugned letter dated 07.09.2023 and 25.09.2024	"F"	22, 23
9.	Copy of representation against the said notification, representation made by APTA President and Seniority List.	"G, H & I"	24 to 26
10.	Copy of order of respondent No. 4 dated 25.09.2024	"J"	27
11.	Wakalat Nama		28

**Dated: 02.11.2024**

ADVOCATE



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

Service Appeal No. 2473 /2024

Muhammad Mashal son of Sherzaman PHST BPS-15 at  
GPS Sufaida Circle, Mansehra D.O.A  
25.08.1992.....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 appellat as Primary School Head Teacher.  
(Copies of first appointment letter and monthly salary account are annexed as Annexure "A")
- 2) That, the Khyber Pakhtunkhwa (Appointment/Promotion/Transfer) Rules, 1989 as well as other sister services of the other provinces and Federation as well, availing of promotion by the employee is always optional and the employees as a matter of right may avail or forego their promotion and the next employee in seniority list is to be promoted.
- 3) That, some employees specifically have foregone their promotion as they could not serve in the areas where there is no facility of accommodation and no houses of their elders are available to look after them in far flung and solitary mountainous hard areas, and as per section 25 of per KP Civil Servant Act, 1973, rules to the extent of terms and conditions is framed by the Chief Minister and such promotion rules are not made applicable with retrospective effect. The rules framed are published in the gazette notification and part and parcel of KP civil Servant Appointment, Transfer, Promotion Rules, 1989.
- 4) That, Government of KP without following the rules position mentioned in Para 6 above promulgated notification SO(POLICY)E&AD/1-3/2020 dated 06.08.2020 communicated to respondent No. 2 vide letter dated 06.06.2023 wherein, it has been made mandatory to the employee to avail the promotion, otherwise. Disciplinary action shall be taken against the employees. The impugned notification is reproduced as under.  
"Furthermore, those officers/officials who do not comply with promotion order of the competent authority or try to evade promotion through different means shall be proceeded against under Khyber Pakhtunkhwa Civil Servants

(Efficiency Discipline) Rules, 2011,  
please".

- 5) That, as per notification No. SO(POLICY)E&AD/1-3/2020 dated 06.08.2020 the right of foregoing of promotion was withdrawn and the Government of Khyber Pakhtunkhwa Establishment Department (Regulation Wing) deleted Rule 7(5) in the notification number SO(POLICY)E&AD/1-3/2020 dated 06.08.2020.

(Copy of impugned notification No. SO(POLICY)E&AD/1-3/2020 dated 06.08.2020 is annexed as Annexure "B")

- 6) That, the Director of Elementary and Secondary Education KPK, Peshawar asked for guidance regarding deletion of Rule 7(5) in Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 in respect of which the respondent No. 1 vide its letter No. SO(POLICY)E&AD/1-3/2020 dated 06.06.2023 directed the respondent no 3 that rule 7(5) in the Khyber Pakhtunkhwa civil servants (Appointment, Promotion and Transfer) Rules, 1989 has been deleted vide notification dated 06.08. 2020 and, therefore, no provision exists to decline or forgo promotion and it is obligatory upon every civil servant to accept promotion under every condition

(Copy of impugned letter dated June 06<sup>th</sup>, 2023 is annexed as Annexure "C")

- 7) That thereafter the meeting was also held in the office of Additional Secretary establishment on 06-07-2023 in which it was decided to examine the case properly and submit a self-contained/consolidated case for onward submission to the Establishment Department for further necessary action.

(Copy of minutes of meeting dated 06-07-2023 is attached as Annexure "D")

- 8) That, the respondent No.3 i.e. Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa also wrote a letter to the office of Establishment & Administrative Department vide No. SO(PRIMARY-M)E&SED/2-2/Appointment Rules, 2023 dated 23.08.2023 to reconsider the amendment made in KPK Civil Servants, Appointment, Promotion and Transfer) Rules, 1989 as it had negatively affected a large number of teachers.

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

- 9) That, the respondents, vide its letter dated 07.09.2023 directed the Directorate of Elementary & Secondary Education KPK that necessary guidance has already been provided to the Department and therefore, no provision exists to decline or forgo promotion and those teachers who do not comply with the promotion order of the competent authority or try to evade promotion through different means shall be

(4)

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 forgo 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, 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**

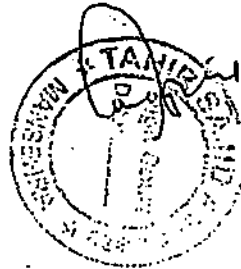
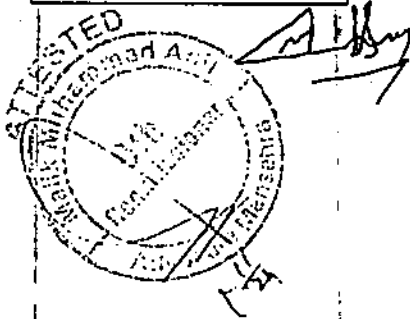
Appellant



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



**BEFORE THE SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA**

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

Muhammad Mashal.....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**

  
Appellant

Through: -

**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.

Tahir Sajid Advocate  
High Court, District  
Courts, Mansehra



ANN: "A" (8)

ANN: "A"

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

OFFICE ORDER NO. 21  
DATED MANSEHRA THE 25/1/92.

Handwritten initials and date: 25/1/92

**APPOINTMENT:-**

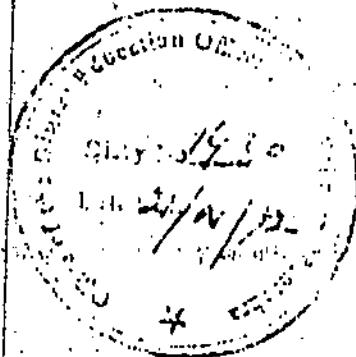
Consequent upon their selection on merit the following PTC/PTC failed candidates in one subject are hereby appointed in NPS No. 7 Ba. 1095-60-1995 for PTC trained @ Rs. 1095/- per month fixed for PTC failed plus usual allowances as admissible under the rules with effect from the date of their taking over charge against the newly created/vacant PTC post in Govt. Primary/Mosque Schools given against their name each in the interest of public service.

S.No.	NAME OF CANDIDATE/FATHER'S NAME ADDRESS	NAME OF SCHOOL WHERE APPOINTMENT MADE.	REMARKS.
	MUHAMMAD RAFIQUE PTC S/O HABAYAT ULLAH R/O JABRI ZUBAIR S/O RAZ MUHAMMAD R/O BALAKOT	GPS JABRI ARBAN	AGAINST V/Pont.
	MUHAMMAD HANIF S/O HLAN ABDUL JALIL R/O SERT BALAKOT	MOSQ. SCHOOL / HOLA KAITRA (KAWALI)	-do-
	MUHAMMAD SAJID PTC GPS NEEL BATLA	GPS KANGAR KAHOLA	-do-
	TAHIR PTC GPS KEHNTAN	GPS NEEL BATLA	-do-
	MANJAD SAIED PTC GPS HART MERA	TO GPS DEB GRAN	-do-
	Mohd. E. Ijaz PTC GPS Shalukki	TO GPS HAREMERA TO GPS KEHNTAN	V/NO. 7 V/NO. 6
	Ayaz PTC Mosq School Narma	to Mosq; School Narma Nakka	vice nr NO. 9
		akka to GPS Shalukki	vice Sr NO. 8

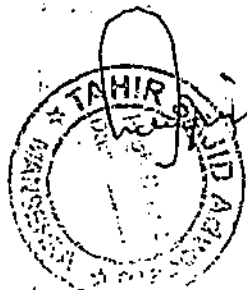
**TERMS AND CONDITIONS:**

They should submit their charge reports to all concerned.  
Their appointment is purely temporary and can be terminated at any time without assigning any reasons.  
Their original academic/PROFESSIONAL certificates should be checked thoroughly before handing over the charge and should not be handed over if the original certificates are not found correct.

(CONTD. PAGE NO. 2)



Attaced



- 1. Their appointment is subject to the verification of their academic/ Professional certificates/documents from the concerned issuing agencies/organization if found correct.
- 2. Their pay will not be drawn till they produce their age & health certificates issued by the Medical Deptt; DHO Hospital Manshera, but they will not be paid and found their appointment will be cancelled, if their academic/professional certificates are found bogus/fictitious or fake on verification.
- 3. They will governed under prescribed service rules of Govt; of NWFP.
- 4. Their appointment will be cancelled if any thing wrong is detected later on in their academic qualifications etc.
- 5. Their age should not be less than 18 years and above 25 years.
- 6. They are allowed to take over the charge of the post with in 15 days of the issue of this letter.
- 7. Transfer Order from S.NO5to9 is issued in the best interest of public service.
- 8. NO TA/DA is allowed to any one.

(SHARQAT HUSSAIN)  
 DISTRICT EDUCATION OFFICER  
 (MALE) PRIMARY MANSHERA.

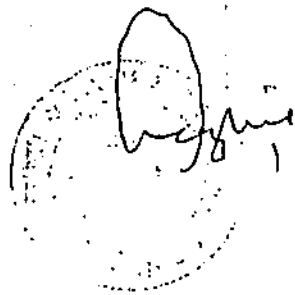
Encls; NO. 112-25-31 /GB/ Apptt/PTC "ated Manshera the 25. 8 /1992.

Copy of the above is forwarded to the:-

- 1. Sub Divisional Education Officer(M) Manshera.
- 2. Accountant General N.W.F.P. Peshawar.
- 3. District Accounts Officer Manshera.
- 4. A.S.D.E.Os Circle Concerned.
- 5. Head Teachers Schools Concerned.
- 6. Candidates Concerned.
- 7. Incharge Day Centres Concerned.
- 8. ASDE(Acett) Male Sub Division Manshera.
- 9. ADEO(Acett) Local Office.
- 10. Office Order File.

*[Signature]*  
 DISTRICT EDUCATION OFFICER  
 (MALE) PRIMARY MANSHERA.

*AAestel*



(10)

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



Personal Information of Mr MUHAMMAD MASHAL d/w/s of SHER ZAMAN

Personnel Number: 00223081 CNIC: 1350305340627 NTN:  
Date of Birth: 30.04.1971 Entry into Govt. Service: 01.09.1992 Length of Service: 31 Years 11 Months 001 Days

Employment Category: Active Temporary

Designation: PRIMARY SCHOOL HEAD TEACH 80003206-DISTRICT GOVERNMENT KHYBE

DDO Code: MA6145-Mansehra

Payroll Section: 001

GPF Section: 001

Cash Center: 2

GPF A/C No: EDUMA009280

Interest Applied: Yes

GPF Balance: 1,321,478.00

Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2022

Pay Scale Type: Civil BPS: 15

Pay Stage: 24

Wage type	Amount	Wage type	Amount
0001 Basic Pay	71,440.00	1001 House Rent Allowance 45%	3,524.00
1210 Convey Allowance 2005	2,856.00	1300 Medical Allowance	1,500.00
1505 Charge Allowance	40.00	2148 15% Adhoc Relief All-2013	950.00
2199 Adhoc Relief Allow @10%	637.00	2316 Teaching Allowance 2021	3,224.00
2341 Dispr. Red All 15% 2022KP	6,807.00	2347 Adhoc Rel Al 15% 22(PS17)	6,807.00
2378 Adhoc Relief All 2023 35%	24,311.00	2393 Adhoc Relief All 2024 25%	17,860.00

Deductions - General

Wage type	Amount	Wage type	Amount
3015 GPF Subscription	-4,290.00	3501 Benevolent Fund	-1,200.00
3609 Income Tax	-6,371.00	3990 Emp Edu. Fund KPK	-135.00
4004 R. Benefit & Death Comp.	-600.00		0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 101,920.65 Recovered till July-2024: 6,371.00 Exempted: 25,479.21 Recoverable: 70,070.44

Gross Pay (Rs.): 139,956.00 Deductions: (Rs.): -12,596.00 Net Pay: (Rs.): 127,360.00

Payee Name: MUHAMMAD MASHAL

Account Number: PLS 22036-8

Bank Details: HABIB BANK LIMITED, 220663 ABBOTTABAD ROAD, MANSEHRA, ABBOTTABAD ROAD, MANSEHRA, MANSEHRA

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address: MANSEHRA

City: MANSEHRA

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email:

Attested



B O

GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT  
(REGULATION WING)

NOTIFICATION

Dated Peshawar, the 06/8/2020

In exercise of the powers conferred by section 26 of the  
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  
Civil Servants (Appointment, Promotion and Transfer) Rules, 1969, the  
amendment shall be made, namely:

AMENDMENT

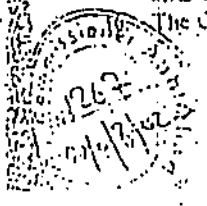
In rule 7, sub-rule (5) shall be deleted.

CHIEF SECRETARY  
GOVERNMENT OF THE KHYBER PAKHTUNKHWA

FOR 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. 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.
16. The Caretaker, Administration Department.



*Waqar Latif*  
(WAQAR LATIF)  
DEPUTY SECRETARY (POLICY)

*Attested*

*Attested*  
*[Signature]*

(12)

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

(AMDS) & 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), ERA Department.
14. All Section Officers in Establishment & Administration, Department.
15. The Section Officer (Admin), Administration Department with the request to arrange 20 gazette copies.
16. The Caretaker, Administration Department.

(WARDAH LATIF)  
DEPUTY SECRETARY (POLICY)

Attest  
  




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

62

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

Subject: MEMORANDUM REGARDING IMPLICATION OF RULE 7(B) IN THE  
KHYBER PAKHTUNKHWA CIVIL SERVAANTS (APPOINTMENT,  
PROMOTION AND TRANSFER) RULES, 1989.

Dear Sir,  
I am directed to refer to your letter No. SO(Polcy-M)2023/11172-  
7/Appointment/2023 dated 10.04.2023 on the subject noted above and to state that Sub-Rule  
(3) of Rule-7 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer)  
Rules, 1989 stands deleted vide this departmental notification dated 06.08.2020; thus, no  
provision exists to decline or forgo promotion.

2. The basic rationale behind the deletion of the said 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,

(Sd/Muhammad Khan)  
Secretary (Polcy)

ASST  
7/6

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 (Polcy), Establishment Department.

Section Officer (Polcy)

Attested  
[Signature]



14

WP3141-2023 LIAQAT SIDDIQ VS GOVT OF KPK CF,PKR

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.

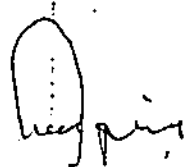
2. the basic Rational behind the deletion of the ibid rule is aimed at preventing a civil servant from temptation for illicit main by sticking to a single lucrative post/position or to prevent those who tend to forgo promotion to evade posting/transfer or show lack of capacity to tackle higher responsibilities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

3. furthermore, those 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)

Attested



Endst: of even No & date

WP3141-2023 LIAQAT SIDDIQ VS GOVT OF KPK CF,PKR



(15)

No SO (Primary-M)/E&SED/2-6/2023  
Dated Peshawar the June 25<sup>th</sup> 2023

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

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

Subject: GUIDANCE REGARDING DELETION OF RULE 7(5) IN THE KHYBER  
PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT, PROMOTION  
AND TRANSFER) RULES, 1909.

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

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

Encl: AA

(MUSHAMMAD ISHAQ)  
SECTION OFFICER (PRIMARY MALE)

Copy forwarded to the:

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

SECTION OFFICER (PRIMARY MALE)

WP4442-2023 AZIZULLAH VS GOVT CP PG43

AKK...  
A...



(16)

ASST. SEC. GEN.

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

No.50 (Primary-M)/E&SED/2-6/2023  
Dated Peshawar (to. June 26<sup>th</sup>, 2023

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

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

*[Handwritten Signature]*  
26/6/23

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

I am directed to refer to the subject noted above and to enclose here with a letter of Establishment Department letter No. 50 (Policy)E&SED/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: 01

*[Handwritten mark]*

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

Copy forwarded to the:

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

*[Handwritten mark]*

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

Attested

*[Handwritten Signature]*



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

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) EBSE Department Civil Secretariat Khyber Pakhtunkhwa Peshawar

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

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

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

(Mr. Fazal Wahid)  
Deputy Director-1  
EBSE Department

\_\_\_\_\_

Provincial President  
All Primary Teachers Association,  
Khyber Pakhtunkhwa

\_\_\_\_\_

(Mr. Razaqat Ullah)  
General Secretary APTA  
Peshawar

\_\_\_\_\_

(Muhammad Ishaq)  
Section Officer (Primary-Male)  
EBSE Department

\_\_\_\_\_

(Abulhasan)

Additional Secretary (Establishment)

*Handwritten signature: Ali Hassan*

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 1909).


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


Sl. No.	NAME	DESIGNATION
1	Mr. Fozal 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 APFA Peshawar
4	Muhammad Ishaq	Section Officer (Primary) E&SE Department Civil Secretariat Khyber Pakhtunkhwa Peshawar

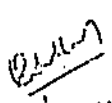
1. The meeting started with recitation from the Holy Quran. The chair welcomed the participants. The Deputy Director (Establishment) of Directorate of Elementary & Secondary Education listed the items regarding agenda item in detail.

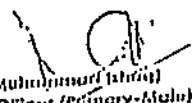
2. After thorough discussion it was decided that Directorate of Elementary & Secondary Education Department may examine the case properly and submit a self-contained/consolidated case for onward submission to Establishment Department for further necessary action.

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

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

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

  
(Mr. Razaqat Ullah)  
General Secretary APFA  
Peshawar

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

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

Attested  






No. 8145 Khyber Pakhtunkhwa, Peshawar  
G. No. J/SS7/UG/Gaberal Cases. Dated: 21-7-2023  
Phone: 011-9223344 Email: establishment@kpk.gov.pk

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/3-17/G.A/Sec/Minutes of the Meeting/PS/7/2023 dated 16-07-2023 on the subject cited above and to 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. No. SOR-1/ (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.0987 dated 16-07-2023.

- (i) Now it is obligatory upon the civil servant to accept promotion in every condition.
- (ii) 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/2-2/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 6-06-2023 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/2-2/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 Rules 7(5) have affected negatively a large numbers of Female Teachers. Thus it is proposed that Teachers below PPS-16 may be exempted of implications of the amendment in the rules if 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 Ad-1)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa

Encls: No. Copy of the above is in:-

1. PA to Director Local Directorate.
2. Master Copy.

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

Attested  
*[Signature]*



( 20 )

To, Directorate of Elementary & Secondary Education, KPK

Peshawar  
(21-7-2023)

Section Officer (Primary-Male)

Elementary & Secondary Education Department,  
KPK, Peshawar

Subject: Minutes of Meeting

Dear Sir,

I am directed to refer to letter no (SO Primary-M) E & SED/S-1/G-Misc/Minutes of meeting/PST/2023 dated 10-7-2023 on subject cited above and to present brief history about background of case as under:

- That Government of KP Establishment department (Regulation Wing) deleted rule 7(5) in civil servants (appointment, promotion and transfer Rule 1999) vide notification no: SOR-VI (E & AD) 1-3/2020 dated 06-08-2020
- That this office sought guidance from your good office in the following words vide letter No 6987 dated 06-02-2023
  - (i) Now, it is obligatory upon civil servant to accept promotion.
  - (ii) It is of civil servant to either accept/turndown the offer of promotion.
- That the government of KP-ED (Regulation wing) vide letter no: SO (Policy) E & AD 1-3/2020 dated 6-06-2023 categorically stated that 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 and necessary actions please.

Copy of the above to;

1. PA to director Local Directorate
2. Master Copy

Assistant Director  
Elementary & Secondary  
Education, Khyber Pakhtunkhwa

Attest



(21)

ANN: E



ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
CIVIL SECRETARIAT PESHAWAR  
(Phone No. 091-8223587)

No. SO(Policy-M)EESED/2-2/Appointment-Rule /2023  
Peshawar Dated 23<sup>rd</sup> August, 2023

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

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

Dear Sir,

I am directed to refer to your letter No. 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)

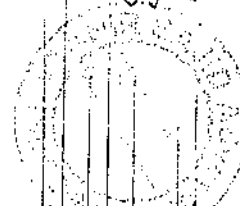
Copy forwarded to the:

1. Director EBSE Khyber Pakhtunkhwa,
2. PS to Secretary, EBSE Department Khyber Pakhtunkhwa.

SECTION OFFICER (PRIMARY MALE)  
20/8/23

Scanned with CamScanner

AHester



(22)

ANN: F



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

To

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

Subject: - GUIDANCE REGARDING DELETION OF RULE 715 IN THE  
KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT,  
PROMOTION AND TRANSFER) RULES, 1939.

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

Yours faithfully,

Section Officer (Policy)

Enclst. Of even No & date :

Copy forwarded to:

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

WP-442-2023 AZIZULLAH VS GOVT OF PK





(23)

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

To

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

Subject:-

GUIDANCE REGARDING DELETION OF RULE 7(5) IN THE  
KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT,  
PROMOTION AND TRANSFER) RULES, 1999.

Dear Sir,

I am directed to refer to your letter No. SO(Primary-M)/ER/SEN/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  


# بخدمت جناب سیکرٹری تعلیم خیبر پختونخواہ

اپیل!

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

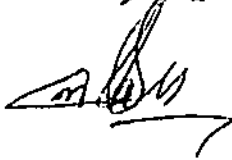
- ۱۔ PSHT پہلے سے سکیل 15 میں ذمہ داریاں سرانجام دے رہے ہیں۔ اپیل دہندہ کی عمر 53 سال ہے اگر وہ سی ٹی پوسٹ لینا چاہے تو سکیل 15 میں ہی آئیں گے اور سینارٹی متاثر ہو کر بارٹم میں چلے جائیں گے جس کا نقصان یہ ہے کہ وہ SST پوسٹ سے محروم رہ جائیں گے۔
- ۲۔ یہ کہ جبراً CT پوسٹ لینا ہمیں منظور نہیں ہے کیونکہ ایک سال کے اندر اندر زیادہ تر PSHT، SST پوسٹ پر پروموٹ ہونے والے ہیں۔
- ۳۔ سابقہ حکومت نے پہلے سے PSHT/SPST اور PST کو اپ گریڈ کیا ہے جو کہ 01-07-2023 سے نافذ العمل ہے لیکن مالی کمی کی وجہ سے تاحال تاخیر کا شکار ہیں۔
- ۴۔ یہ کہ سکیل 15 سے سکیل 15 میں جانا کہاں کا پروموشن ہے یہ تو صرف کیڈر تبدیل ہو جاتا ہے اور ہمارا مطالبہ پروموشن اپ گریڈیشن ہے جس میں واضح تبدیلی آجائے گی۔

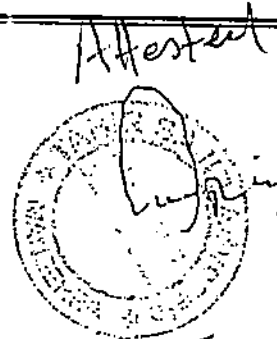
لہذا ہم اساتذہ حکومت خیبر پختونخواہ سے مطالبہ کرتے ہیں کہ مذکورہ نوٹیفیکیشن کو منسوخ کریں اور اساتذہ کی بے چینی کو ختم کریں ورنہ ہم عدالت جانے میں حق با جانب ہوں گے۔

02/07/2024

محمد مشال PSHT

GPS سفیدہ سرکل مانسہرہ





کاپی ٹو!

۱۔ جناب سیکرٹری تعلیمات KPK

۲۔ جناب ڈائریکٹر تعلیمات KPK

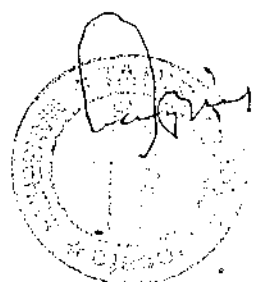


(26)

ANN: "I"

N.SL No	O.SL No	Name of Present School	Name	Father's Name	BPS	Acad
223	1350	GPS DATTA	ABDUR REHEEM	MUHAMMAD YOQUAB	15	BA
224	1351	GPS BUHRAJ	MOHAMMAD SADAQAT	MOHAMMAD ASLAM	15	MA
225	1352	GPS POODNIAL	MUHAMMAD RIAZ	ABDUR REHMAN	15	BA
226	1353	GPS MADDAN	ISHTAQ AHMAD	TAJ MUHAMMAD	15	FA
227	1358	GPS HAR NAKKA	ARIF HUSSAIN SHAH	USMAN SHAH	15	BA
228	1359	GPS SAFAIDA	MUHAMMAD MUSHAL	SHEER ZAMAN	15	MA
229	1363	GPS POTH SHAHKOT	ABDUL RASHEED	FARAZ KHAN	15	BA
230	1364	GPS BANDI MORE BAFFA	ZULFIQAR AHMED	ABDUR REHMAN	15	MA
231	1366	GPS BARATT	LIAQAT ALI	TAJ MUHAMMAD	15	FA
232	1367	GPS KHUSHALA	TARIQ MEHMOOD	M ASHRAF	15	MA
233	1368	GPS TEMBER	SHAH NAWAZ	FAZAL UR/REHMAN	15	BA
234	1370	GPS PARIAN	MUHAMMAD RIAZ KHAN	MEHBOOB UR REHMAN	15	BA
235	1371	GPS TANDA	MUHAMMAD ARIF	MOHAMMAD HUMAYUN	15	BA
236	1372	GPS BEDADI	ZAHID HUSSIAN	GHULAM RABBANI	15	BA
237	1374	GPS BAGH	MUHAMMAD KHALID	ABDUL KHALIQ	15	BA
238	1375	GPS BATTANG T SHAH	RASHID AHMAD	MUHAMMAD AYYUB	15	MA
239	1376	GPS TANDA	MURAD KHAN	GHULAM NABI	15	FA
240	1377	GPS CHANSAIR	LAL KHAN	ABDUR REHMAN	15	MA
241	1378	GPS SHEIKH ABAD	HAQ NAWAZ	AZIZ GUL	15	MA
242	1379	GPS SEHAKI BALA	MUHAMMAD ASHRAF	SHER MUHAMMAD	15	BA
243	1380	GPS DAHMAN DHERI	MUHAMMAD SAEED	GHULAM SARWAR	15	BA
244	1382	GPS SALOONA	MUHAMMAD ZUBAIR	ABDUL JAMEEL	15	BA
245	1383	GPS SARI MALWAL	KHALID FAROOQ	ABDULLAH KHAN	15	FA
246	1387	GPS MUND GRAWAN	MUHAMMAD MISKEEN	ABDUL QAYYUM	15	MA
247	1388	GPS CHULANDRIAN	FARID KHAN	M. MISKEEN KHAN	15	MA
248	1389	GPS REEN	WAHEED UR REHMAN	MEHNDI ZAMAN	15	BA
249	1390	GPS AHL NO.1	SARDAR	MUHAMMAD UMAR	15	BA
250	1392	GPS BAJMOHRI	ZUBAIR	BAZMUHAMMAD	15	FA
251	1393	GPS KHER MERA	MUHAMMAD RIAZ	DUR/E/EMAN	15	MA
252	1394	GPS SHANAI BALA	IFTIKHAR AHMAD	MOHAMMAD ZAREEN	15	FA
253	1395	GPS KARKA SYDAN	M RIAZ	AHMED GUL	15	BA
254	1405	GPS BATTI KUNDI	MUHAMMAD SIDDIQUE	GOHAR UR REHMAN	15	FA
255	1407	GPS Dana Phulra	AFTAB AHMAD	MANZORE HUSAIN	15	FA
256	1411	GPS KANGER GHARI	MUHAMMAD HANIF	MUHAMMAD SADIQ	15	FA
257	1417	GPS CHAJJAR PAYEEN	KHURSHEED ANWAR	SARFARAZ KHAN	15	BA
258	1418	GPS KARMANG BELA	MUHAMMAD SAJJAD	FAZAL UR RAHMAN	15	FA
259	1419	GPS KHABAL BALA	ANWAR ZEB KHAN	AZIZ UR REHMAN	15	BA
260	1421	GPS MALIK PUR	MUHAMMAD SAJID KHAN	MUHAMMAD DAUD KHAN	15	FA
261	1422	GPS RATTIAN	MUHAMMAD AZHAR	MUHAMMAD SULMAN	15	MA
262	1423	GPS BANDA	IFTEKHAR ASHRAF	MUHAMMAD ASHRAF	15	BA
263	1425	GPS BAFFA KHURD	MUHAMMAD SADIQ	SARFARAZ	15	BA

Attested



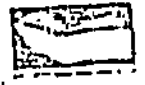


27

Annex 'J'

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MANSHEHRA

Phone No. 02231 450000 02231  
E-mail Address:   
Fax No.   
E-mail Page



No. 2181

Dated 25/9/2024

To

The All Sub-Divisional Education Officer,  
Males District Manshehra

Subject

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

Message

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

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

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

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

DISTRICT EDUCATION OFFICER  
(MALE) MANSHEHRA

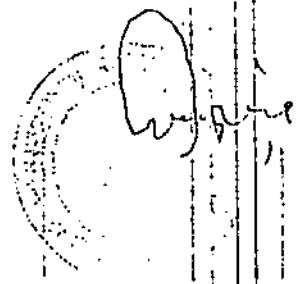
Encl: No. 2159-53 Dated 25/9/2024

Copy for information to the:-

- 1. The Director E&SE KPR Peshawar.
- 2. The Deputy Commissioner Manshehra
- 3. Office Copy.

BY: DISTRICT EDUCATION OFFICER  
(MALE) MANSHEHRA

Attested



(28) 52992

DBAM No. 338  
BC No. 10-2457  
Name of Advocate علیہ ساجد

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

Fee Rs. 200/-



2024-25  
GENERAL SECRETARY  
District Bar Association  
Manshera

وکالت نامہ

بعدالت: جناب سروس ٹریبیونل لہشاور KPK

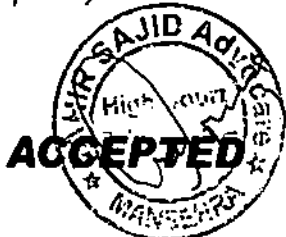
عنوان: محمد مشال بنام: سیکرٹری ٹو حکومت KPK

منجاب: ایسٹاڈنٹ نوعیت مقدمہ: سروس اپیل

باعث تحریر آنکہ

دریں مقدمہ عنوان بالا میں اپنی طرف سے برائے پیروی و جواب دہی بمقام ایسٹ آباد کے لئے  
طاہر ساجد ایڈووکیٹ مہاشی کورٹ  
کو بدیں شرائط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا رہوں گا اور بوقت پکارے  
جانے وکیل موصوف کو اطلاع دیکر حاضر کروں گا۔ اگر کسی پیشی پر مظہر حاضر نہ 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 ہوا یا کچہری کے اوقات کے آگے پیچھے سماعت ہونے پر مظہر کو کوئی نقصان پہنچے تو وکیل موصوف ذمہ دار  
نہ ہوں گے اور وکیل موصوف کو عرضی دعویٰ اور درخواست اجراء ڈگری و نظر ثانی اپیل نگرانی دائر کرنے نیز ہر قسم کی درخواست  
بیان حلفی و تصدیق کرنے اور اسپر دستخط کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کے اجراء کرانے اور قسم کاروبہ وصول  
کرنے اور رسید دینے اور داخل کرنے کا ہر قسم کا بیان دینے اور سپر دائاشی 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  
کر بشرط ادا ہوگی علیحدہ مختانہ ادا کرنے کا مجاز ہوگا اور بصورت ضرورت بدور اس 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 پرداختہ 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۔

سورخ 2 نومبر 2024ء



محمد مشال ولد شیر زمان سکرن صدر بانڈری تحصیل ضلع مانسہرہ۔ ایسٹاڈنٹ