


FORM OF ORDER SHEET

Court of _____

Appeal No. 2529 /2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	19 /11/2024	<p>The appeal presented today by Mr. Muhammad Muazzam Butt Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 21.11.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

CHECK LIST

Case Title: _____ v/s _____

S#	CONTENTS	YES	NO
1	This Appeal has been presented by: _____	✓	
2	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	✓	
3	Whether appeal is within time?	✓	
4	Whether the enactment under which the appeal is filed mentioned?	✓	
5	Whether the enactment under which the appeal is filed is correct?	✓	
6	Whether affidavit is appended?	✓	
7	Whether affidavit is duly attested by competent Oath Commissioner?	✓	
8	Whether appeal/annexures are properly paged?	✓	
9	Whether certificate regarding filing any earlier appeal on the subject, furnished?	x	✓
10	Whether annexures are legible?	✓	
11	Whether annexures are attested?	✓	
12	Whether copies of annexures are readable/clear?	✓	
13	Whether copy of appeal is delivered to AG/DAG?	✓	
14	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	✓	
15	Whether numbers of referred cases given are correct?	✓	
16	Whether appeal contains cutting/overwriting?	x	✓
17	Whether list of books has been provided at the end of the appeal?	✓	
18	Whether case relate to this court?	✓	
19	Whether requisite number of spare copies attached?	✓	
20	Whether complete spare copy is filed in separate file cover?	✓	
21	Whether addresses of parties given are complete?	✓	
22	Whether index filed?	✓	
23	Whether index is correct?	✓	
24	Whether Security and Process Fee deposited? On _____	✓	
25	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On _____	✓	
26	Whether copies of comments/reply/rejoinder submitted? On _____	✓	
27	Whether copies of comments/reply/rejoinder provided to opposite party? On _____	✓	

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name: _____

Signature: _____

Dated: _____

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHUWA

A No. 2529 / 2024

Muhammad Shirez

v/s

Government of KP & others

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ADVOCATE

M. Muazzam Butt

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHUWA

In Ref to

Service Appeal No 2529 /2024

Khyber Pakhtunkhwa Service Tribunal

Diary No. 18073

Dated 19/11/24

Mohammad Sheeraz Son of Wali Hussain, PST
GPS Basala, Tehsil & District Abbotabad

.....Appellant

VERSUS

- 1) Secretary to Government of Khyber Pakhtunkhwa, Establishment Department, Civil Secretariat, Peshawar
- 2) Secretary to Government of Khyber Pakhtunkhwa, Elementary and Secondary Education Department, Civil Secretariat, Peshawar
- 3) Director Elementary and Secondary Education Department, Civil Secretariat Near MPA Hostel, Peshawar

.....Respondents

SERVICE APPEAL UNDER SECTION 4 OF KPK SERVICE TRIBUNAL ACT 1974. AGAINST THE IMPUGNED NOTIFICATION BEARING NO.SO(POLICY)E&AD/1-3/2020, DATED 06/08/2020, COMMUNICATED TO RESPONDENT NO. 2 VIDE LETTER DATED 06/06/2023, WHEREIN IT WAS STATED THAT SUB RULE 5 OF RULE 7 OF KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT, PROMOTION AND TRANSFER) RULES, 1989 STANDS DELETED

PRAYER:

Filed to-day
Registrar
19/11/24

ON ACCEPTANCE OF INSTANT SERVICE APPEAL, THE IMPUGNED NOTIFICATION BEARING NO: SO (POLICY) E&AD/1-3/2020, DATED 06/08/2020, COMMUNICATED TO RESPONDENT NO. 2 VIDE LETTER DATED 06/06/2023, MAY BE DECLARED AND ORDERED TO BE STRUCK DOWN BEING VOID AND ULTRA VIRES TO THE CONSTITUTION OF PAKISTAN AND FUNDAMENTAL PRINCIPLES OF NATURAL JUSTICE AND AGAINST THE RIGHTS OF APPELLANT.

ANY OTHER RELIEF WHICH THIS HONOURABLE 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 Teacher.
Copy of Appointment letter is annexed as **Annexure A**

2. That as per Khyber Pakhtunkhwa (Appointment/ Promotion/ Transfer) Rules, 1989, as well as in other sister services of the other Provinces and Federation as well, availing of promotion by the employees 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 condition 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 and Promotion Rules 1989.
4. That Government of K.P without following the rules position mentioned in Para 6 above promulgated Notification No. SO (Policy) E&AD/1 3/2020, dated 06/08/2020, communicated to Respondent No.2 vide letter dated 06/06/23 wherein it has been made mandatory to the employees 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. SD (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 Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 vide notification no SOR-VI (E & AD)/1-2/2020 dated 06-08-2020. Copy of Impugned notification No. SD (Policy) EV AD/1- 3/2020 dated 06/08/2020 is attached as Annexure B
6. That the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa 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 Peshawar the June 06th, 2023 directed the respondent No 3 (Directorate of Elementary & Secondary Education) 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 forego promotion and it is obligatory upon every civil servant to accept promotion under every condition. Copy of Impugned letter dated June 06th, 2023 is attached 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 & 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 Rule/2023 dated 23-08-2023 to reconsider the amendment made in Khyber

Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 as it had negatively affected a large number of teachers and especially female teachers. Copy of Letter dated 23-08-2023 is attached as Annexure E

9. That the respondent vide its letter dated 07th of September 2023 directed the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa 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 Khyber Pakhtunkhwa Civil Servant (Efficiency & Discipline) Rules, 2011. Copy of Impugned letter dated 07-09-2023 is attached as Annexure F.
10. That the petitioner feeling aggrieved, filed Representation to the respondents in person, and also approached to respondents through APTA President but the grievances of the appellant have not so far been redressed. Copy of Representation against the said notification is annexed as Annexure G & H
11. That feeling aggrieved from the letters dated 06-06-2023 and 07-09-2023 and the deletion of Rule 7(5) in the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989; the petitioners filed this Hence, the instant service appeal is filed on the following grounds:-

GROUND:-

- a. That as per various judgments it is established and settled principle that executive notifications cannot be given retrospective effect. A valid Notification which confers rights is always applicable with prospective effect, however, if an amendment notification that adversely effects the interests of the employees or causes disadvantage 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 employees 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 employees were permanently debarred from availing the facility of promotion during their entire service. Hence the employees himself/herself 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 be set-aside.
- d. That it is further submitted that on account of grant of promotion, some employees who are suffering from severe 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 her promotion it must be optional for the employees as to whether to avail or forego the benefits. Any promotion without willingness of employee is illegal and liable to be setaside.

- 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 for promotion could be promoted.
- f. That the impugned promotion Notification dated 06/08/2020 communicated on 06/06/2023 is perverse, discriminatory, against the law, pungent and is a blunt blow of hammer on the rights of the appellant. It is not out of place to mention here that the appellant are teachers and have to look after their children as well as ailing dependent family members and in these circumstances in the presence of impugned Notification dated 06/08 /2023 communicated on 06/06/23 would not be able to serve in the department and which shall amount to the snatching of bread and butter of the poor employees

It is, therefore, humbly prayed that on the acceptance of the instant Service Appeal; the impugned Notification bearing No. SO (POLICY) E&D/1-3/2020 DATED 06/08/2020, communicated to Respondent No.2 by Respondent NO.1, vide letter dated 06/06/2023, may please be declared and ordered to be struck down being Void, Ultra vires to the Constitution of Pakistan and against the fundamental principles of natural justice.

It is further prayed that no penal action as proposed and envisaged in letter dated 06/06/2023 may be declared as unlawful, illegal and without having any legal effect.

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

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 Honourable Court.

[Signature]
 Deponent



[Signature]
 19/11/2024

[Signature]
 Appellant
 Through
 Muhammad Muazzam Butt
 Advocate Supreme Court

[Signature]
 Muhammad Adeel Butt
 Advocate High Court

[Signature]
 Bassam Ahmad Siddiqui
 Advocate High Court
 LL.M- Human Rights

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA

CM No. _____ P-Of 2024

In Ref to

Service Appeal No. _____ /2024

Muhammad Shieq
VERSUS

Secretary to Government of Khyber Pakhtunkhwa, & others

APPLICATION FOR SUSPENSION OF IMPUGNED NOTIFICATION BEARING NO. SO (POLICY) E&D/1-3/2020 DATED 06/08/2020, COMMUNICATED TO RESPONDENT NO.2 BY RESPONDENT NO.1, VIDE LETTER DATED 06/06/2023 TILL THE FINAL DISPOSAL OF CASE IN HAND.

Respectfully Submitted:-

1. That the instant application may be treated as part and parcel of service appeal of the appellant

2. That the appellant has brought a good prima facie case and balance of convenience also lies in favor of the appellant

3. That there is likelihood success of the appellant in the ILS And if the notification bearing No. So (Policy) E&D/1-3/2020 dated 06/08/2020, communicated to Respondent No.2 by Respondent No.1, vide letter dated 06/06/2023 is not suspended the appellant would suffer irreparable loss.

4. That valuable rights of the appellant is involved in the case.

In view of the reasons, it is humbly requested that the notification bearing No. So (Policy) E&D/1-3/2020 dated 06/08/2020, communicated to Respondent No.2 by Respondent No.1, vide letter dated 06/06/2023 may kindly be suspended till the final disposal of the main appeal in hand.

Through

[Signature]
Appellant

[Signature]
Muhammad Nazam Butt
Advocate Supreme Court

[Signature]
Muhammad Adel Butt
Advocate High Court



AFFIDAVIT
I (the appellant) do hereby solemnly stated on oath 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 Court

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (ELEMENTARY & SECONDARY EDUCATION) ABBOTTABAD

APPOINTMENT

Consequent upon the recommendation of Departmental Selection Committee and the approval of competent authority the appointments of the following PSTs (Male) are hereby ordered in BPS-09 @ Rs.3820-230-10720 plus usual allowances as admissible to them under the rules at the schools noted against their names in the interest of public service subject to the terms and conditions noted below:-

(OPEN MERIT)

SNO	Name of Candidate	Father Name	Name of UC	Merit Position	Place of posting	Remarks
1	M. Maqsood	All Rehman	Dala'a	66.571	GPS Dabban	A.V.Post
2	Haseeb Mehboob	Mehboob Khar	Nagr Bala	62.072	GPS Kukhriala	A.V.Post
3	M. Mushtaq	M. Miskeen	Booh	59.802	GPS Bagh	A.V.Post
4	Rozwanuz Zaman	M. saeed	Lora	58.753	GPS Khulan	A.V.Post
5	M. Khalid	M. Iqbal	Kulhiala	58.499	GPS Tadoo Maira	A.V.Post
6	Nadeem Khan	M. S. Iqbal	Nagr Bala	57.63	GPS Har Kote N Gali	A.V.Post
7	M. Naveed Lodhi	Aziz ur Rehman	Dafala	57.483	GPS Bagla No.1	A.V.Post
8	M. Imran	Ghar Rehman	Bakote	57.005	GPS Dakhan Moha	A.V.Post
9	Fuzal Karim	M. Fareed	Birole	56.919	GPS Lahoor	A.V.Post
10	Iftakhar Ahmad	Changatz Khan	P.K. Khan	56.914	GPS Kangar Bala	A.V.Post
11	Shakeel Ahmad Khan	Shabir Ahmad K	Chmahad	56.885	GPS Bagh Dara	A.V.Post
12	Anar ulah	M. Saleem	B.P. Khan	56.789	GPS Maira Ban	A.V.Post
13	Jalil ur Rehman	M. Miskeen	Pivatah	56.604	GPS Ripper	A.V.Post
14	Zia ur Rehman	M. Irfan	Nathla Gali	56.569	GPS Upper Pasala	A.V.Post
15	M. Ajmal Khan	M. Aslam Khan	G.P. Gran	56.531	GPS Chunaif Lora	A.V.Post
16	Junaid Umer Arshad	M. Arshad	Nawan Shehr	56.464	GMPS Nakar Majhot	A.V.Post
17	S. Kashi Hussain	S. Sabir Hussain	Jarral	56.305	GPS Jaral	A.V.Post
18	M. Naeem	M. F. shraf	Phakote	56.01	GPS Kutil Phakot	A.V.Post
19	Naseer Ahmad	Abdul Rehman	Kulhwai	55.987	GPS Basala	A.V.Post
20	Muhammad Mazhar	M. Sulman	Pluck	55.927	GPS Andar Kote	A.V.Post
21	Gul Noshad	M. Ashraf	Sherwan	55.892	GPS Bagh Dehara	A.V.Post
22	Hafeez Ahmad	Abdul Qayyum	Jhangli	55.877	GPS Pehal (Pawa)	A.V.Post
23	Naseer Ahmad	M. Khan	Sherwan	55.75	GPS Thora Khurd	A.V.Post
24	Sajid Hussain Shah	S. Sabir Hussain	Jarral	55.746	GPS Gul Bandi Jarral	A.V.Post
25	Fiaz Khan Jadoon	Zardad Khan Jad	B.P. Khan	55.599	GPS Maira Ban	A.V.Post
26	Tariq Mahmood	Zardad Khan	Sarbana	55.546	GPS Sabal	A.V.Post
27	Shahzad Khan	Sulian Khan	Dhamlour	55.483	GPS Tahra	A.V.Post
28	M. Ishfaq	M. Ilyas	Pawa	55.405	GPS Ulli Gandian	A.V.Post
29	Waqas Ahmad Abbas	Abdul Aziz Khan	Namal	55.18	GPS Kurk Majuhan	A.V.Post
30	Abdul Hameed	Karam Dad Khan	Jhangli	55.047	GPS Pehar (P.K. Khan)	A.V.Post
31	M. Saadq	Abdur Rehman	Kulmang	54.992	GPS Gandjala	A.V.Post
32	M. Munir	Lal	B.P. Khan	54.988	GPS Bandi Kalu	A.V.Post
33	Aftab Ahmad	Taj Muhammad	Dawal Manal	54.767	GPS Makool Pinn	A.V.Post
34	Wali ur Rehman	Dadan Khan	Tawal	54.744	GPS Tupla	A.V.Post
35	Sajid Mahmood	Dadan Khan	Jhangra	54.738	GPS Atman	A.V.Post
36	Aftab Ahmad	Gulistan Khan	Sahad	54.671	GPS Uper Makote	A.V.Post

[Handwritten signature and initials]

6-A

37	M Azeem	Ghulam Rabani	P.K.Khan	54.545	GPS Lakhala	A.V.Post
38	Nasir Khan	Misar Khan	Sahad	54.54	GPS Uper Malkote	A.V.Post
39	Saif ur Rehman	Shafiqueur Rehman	Jarral	54.449	GPS Nakhy Saydan	A.V.Post
40	Saeed Akhtar	Muh.Sadq	B.P.Khan	54.381	GPS Kail Dahar	A.V.Post
41	Nisar Ali	Ak Afsar	Nathia Gali	54.342	GPS MAIRA PASALA	A.V.Post
42	Syed Shujat Hussain	S.Qalandar Shah	Bagh	54.337	GPS Jaglan Khollan	A.V.Post
43	Syed Husnain Raza	S.Mubrak Shah	Sarwana	54.171	GPS Dakka Malkote	A.V.Post
44	Sajjad Ahmad Jan	M.Khalid	Urban Kehal	54.059	GMPS Lower Surjal	A.V.Post
45	M.Parvez	Bagga Khan	Nara	53.992	GPS Chanjah	A.V.Post
46	Faisal Ali	M.Ayub	Dhamtour	53.787	GPS Masoma	A.V.Post
47	Naseem Akhtar	Abdul Haleez	Lora	53.761	GPS Seri Lora	A.V.Post
48	Naseer Ahmad	M.Rasheed	P.K.Khan	53.564	GPS Hall Lakhala	A.V.Post
49	Nasir Mehmood	M.younis	Seer Sharqi	53.465	GPS Naroola	A.V.Post
50	Shokat Nazir	M.Nazir	Jhangli	53.375	GPS Danna Khan Kalan	A.V.Post
51	Riazat Khan	Arab Khan	G.P.Gran	53.365	GPS Chunali Lora	A.V.Post
52	Fareed Ahmad	Abdul Qayyum	Jhangra	53.343	GPS Dhar Rakhala	A.V.Post
53	M.Azhar	M.Ayub	Kuthwal	53.332	GPS Rlayala Bandi(P.Kalan)	A.V.Post
54	Zaid ul Hussain	Ghulam Rabani	Bagnolar	53.315	GPS Takandi	A.V.Post
55	M.Mushtaq	Gul Hussain	Bol	53.308	GPS Barbeen	A.V.Post
56	Zakir Mehmood	M.Mehboob	Nagri Bala	53.219	GMPS Sulfi Mohalla Chakar	A.V.Post
57	Sajjad Ahmad	M.Ashraf	B.P.Khan	53.193	GPS Saranda	A.V.Post
58	M. Asif	Khair Ullah	B.P.Khan	53.104	GPS Ali Abad	A.V.Post
59	M SAJID	M.Hamayun	Dalola	53.102	GPS Dabban	A.V.Post
60	M.Waqar	M.Bashir	Phallah	53.088	GMPS Jhangri	A.V.Post
61	M.Farooq	M.Sulman	Bol	53.063	GPS Daedal	A.V.Post
62	Arshad Mehmood	M.Sulman	Kakul	52.919	GMPS Nakkur Domala	A.V.Post
63	Sateer Ahmad	M.Miskeen	Dalola	52.809	GPS Dolat Makr	A.V.Post
64	Mumtaz Ahmad Khan	Gulfranz Khan	Phallah	52.769	GPS Sadalh	A.V.Post
65	Majid Khan	Karam Khan	Nawan Shehr	52.757	GPS Jattal	A.V.Post
66	M.Rehan	M.Amwar Khan	G.P.Gran	52.842	GPS Thuba Lora	A.V.Post
67	Abdul Waheed	Mir Dad	Dhamtour	52.565	GPS Slat Khan	A.V.Post
68	M.Azhar	Ahmad Khan	Beran Gali	52.563	GPS Jogi Majr	A.V.Post
69	Sher Afzal	Abdul Majeed	Pattan kalan	52.456	GPS See Trar	A.V.Post
70	Waheed ur Rehman	Noor Zaman	Phalkote	52.374	GPS Phalkot	A.V.Post
71	Jamil Ur Rehman	M.Sulman	Nagri Bala	52.345	GPS Kulla	A.V.Post
72	Abdul Ghaffar	M.Gulzar	Baladhari	52.306	GPS Rlayala Bandi(P.Kalan)	A.V.Post
73	Waheed ur Rehman	Fazal Dad	Bakote	52.265	GPS Khan Khurd	A.V.Post
74	Tahir Abbas	Mubarak Shah	Langrial	52.234	GPS Gail Baigran	A.V.Post
75	M.Sajid	Ali Zaman	Kuthwal	52.207	GPS Nakar Khan Kalan	A.V.Post
76	Aamir Shahzad	Muqab Khan	Seer Ghrbi	52.198	GPS Baswalr	A.V.Post
77	M.Ani	Khan Zaman	Beran Gali	52.19	GMPS Hill Naka	A.V.Post
78	M.Fareedoon	M.Younis	Havelian	52.187	GPS Tehra	A.V.Post
79	Abdul Haseeb	Abdul Maleen	Majuhan	52.171	GPS Missah Gojri	A.V.Post
80	M Tariq	Behram Khan	Langrial	52.114	GPS Danna Noma	A.V.Post
81	M.Irshad	M.Ayub	Majuhan	52.112	GPS Karaga Lora	A.V.Post
82	Raja M.Yasir	Raja Dost Muhd.	Kuthwal	52.08	GMPS Dhery	A.V.Post
83	Habib Ur Rehman	Abdul Rehman	Nami Maira	52.015	GPS Mohala Gelani Pir Kote	A.V.Post
84	Dilshad	Mir Dad	Bagnolar	51.998	GPS Doga Kukmong	A.V.Post
85	Muhammad Tariq	Kala Khan	Nagri Bala	51.878	GPS Larri Kanthali	A.V.Post
86	Saif ur Rehman	Fazul ur Rehman	Bol	51.865	GPS Makreela	A.V.Post

6-B

	Muhammad Saleem	Abdul Jallil	Kulhwal	51.865	GMPS Seer Goh	A.V.Post
88	Muhammad Asif Khan	M.Roshan Khan	Sherwan	51.824	GPS Beri Chamhail	A.V.Post
89	M.Mushlaq	M.Sultan	Kulhwal	51.815	GMPS Navell Berole	A.V.Post
90	Niaz Khan	Allah Dad Khan	G.P.Gran	51.774	GPS Gohal	A.V.Post
91	M.Asad Khan	M.Fareed Khan	Nawan Shehr	51.747	GPS Jattal	A.V.Post
92	M.Zaheer	Abdul Jabbar	Langhail	51.745	GPS Lissan	A.V.Post
93	Aamir Abbasi	M.Abbas	Seer Ghrbi	51.693	GPS Nareela	A.V.Post
94	Abdul Haq	G.M.Abdullah	Nara	51.661	GPS Kangar Hotel	A.V.Post
95	Yasir Munir	M.Munir	Phallah	51.654	GMPS Badala	A.V.Post
96	S.Sawar Shah	S.Hussan Shah	Sarbanu	51.584	GPS Khan Makote	A.V.Post
97	Naseer Ahmad	M.Ashraf	Phakote	51.471	GPS Jandala Phuck	A.V.Post
98	Yasir Aralat	Dalidar Khan	Nahia Gali	51.37	GPS Karl Sarfak	A.V.Post
99	Balil Shah	Sabir Shah	Bagh	51.367	GPS Muslim Abad Rajoya	A.V.Post
100	Dilawar Khan	Kala Khan	Baladhari	51.336	GPS Nakar Pakho	A.V.Post
101	M.Azeem Khan	Ali Aksar Khan	G.P.Gran	51.269	GPS Phallah	A.V.Post
102	M.Azeem	M.Akram	Namal	51.245	GPS Akhora No.2	A.V.Post
103	Niaz Ali	Gul Khalab	Nara	51.145	GPS Maril	A.V.Post
104	M.Fayyaz	Munsif Khan	Sarbanu	51.122	GMPS Dunna Misrial	A.V.Post
105	M.Kabeer Abbasi	Shabeer Ahmad A	Bakote	51.107	GPS Bakote	A.V.Post
106	M.Shakeel	M.Kabeer	Birole	51.044	GPS Nari Hotel	A.V.Post
107	M.Abid	M.Ashraf	Jhangra	51.027	GPS Narian Gehar	A.V.Post
108	Munir Ahmad	Ghulam Ali	Dalola	50.996	GMPS Kalas	A.V.Post
109	M.Ibrahima	Mir Hassan	Nagri Bala	50.94	GPS Upper Changar N.Gali	A.V.Post
110	Liqat Khan	Mumtaz Khan	Sarbanu	50.865	GMPS Haveli Riyala	A.V.Post
111	M.Azhar	M.Ishaq	Namal	50.853	GPS Payian Maluhan	A.V.Post
112	Tahir Khan	Naseer Khan	Nawan Shehr	50.853	GPS Andar sari	A.V.Post
113	M.Sheraz	Wali Hussain	Baladhari	50.786	GPS Basala	A.V.Post
114	Wajid Khan	M.Sarwar	Sherwan	50.733	GPS Chukil Kuthiala	A.V.Post
115	Fahad Murtaza	G.Murtaza	G.P.Gran	50.685	GGPS Kasaki (Khalan Chamhad)	A.V.Post
116	Zaheer Gul	M.Yousoob	Kulhwal	50.666	GMPS Mawan De Hill	A.V.Post
117	Faheem Ahmad	M.Yaqoob	Nagri Bala	50.586	GPS Massana Khurd Battangi	A.V.Post
118	M.Abid	M.Sadiq	Sherwan	50.506	GPS Taror Sec	A.V.Post
119	Saeed Ahmad	Aziz Ahmad	Majuhan	50.437	GPS Bassan Lora	A.V.Post
120	M.Tarveer	Dawood	Dalola	50.337	GMPS Sangar Seona	A.V.Post
121	Azhar Melimood	M.Manzoor Ahmad	Baladhari	50.335	GPS Nakar Pakho	A.V.Post
122	Rashid Mehmood	khanizaman	Bagh	50.326	GPS Kull Bagh	A.V.Post
123	Hamayat ur Rehman	Gul Zareen	Phallah	50.319	GPS Balia No.2	A.V.Post
124	Majid Sultan	M.Sultan	Bagnotar	50.292	GPS Darwaza	A.V.Post
125	Abdul Qadeer	M.Ismail	Boi	50.257	GPS Rankote	A.V.Post
126	M.Asif Khan	Abdul Aziz	Dalola	50.23	GPS Darra Dalola	A.V.Post
127	Roshan Dan	Said Akbar	Dawal Manal	50.195	GPS Balangl No.1 Lora	A.V.Post
128	Mushraf Khan	M.Ashraf Khan	Jhangra	50.058	GPS Kokal Barseen	A.V.Post
129	Zia Ur Rehman	Abdul Manan	Canil Aid	49.979	GPS Nakkal Mujwal	A.V.Post
130	Abdul Qadeer	M.Bashir	Maik Pura	49.86	GPS Hattol Berole	A.V.Post
131	Saqib Ali	Abdul Rasheef A	Namal	49.788	GPS Langa Loot	A.V.Post
132	M.Shabir	M.Shareef	Namal	49.601	GPS Beri Bagla	A.V.Post
133	M.Nawaz Akhtar	M.Akhtar	Nahia Gali	49.561	GPS Khatar Bhagan	A.V.Post
134	Adnel Iqbal	M.Iqbal	B.P.Khan	49.52	GPS Nakar Khan Kalan	A.V.Post
135	Zaffar Iqbal	Farooq	Namal Maira	49.495	GPS Thakriala Lora	A.V.Post
136	M.Ilat	M.Sadiq	Dawal Manal	49.485	GPS Thuba	A.V.Post

why?

True

6-C

137	Akmal Khan	M.Yousaf Khan	Majuhan	49.413	GPS Banwari Lora	A.V.Post
138	M.Fiaz	M.younis	Kuthwal	49.389	GPS Tarhatti	A.V.Post
139	Jumshaid Khan	M.Yousaf Khan	Chmahad	49.369	GPS Ghori	A.V.Post
140	M.Amyad	M.Nazar Khan	Phailah	49.359	GPS Ghambeer No.2	A.V.Post
141	M.Naheed	M.Wajib	Seer Ghrbi	49.358	GPS Daghan	A.V.Post
142	M.Shabir	Magbool/Rehman	Kukmong	49.233	GPS Kanihall Uper	A.V.Post
143	Mehtab Ahmad	M.Akram	Phalkote	49.097	GPS Danna Surjal Pluck	A.V.Post
144	Zakar Hussain	M.Khushal	Pattan kalan	49.085	GPS Banota	A.V.Post
145	Tabasam Mehboob	Mehboob Hussain	Jarral	49.07	GPS Bucha Gal	A.V.Post
146	Tanveer	M.Aman	Boi	48.957	GPS Bandi Pahar	A.V.Post
147	Faisal Sarfraz	Sarfraz	Kuthlala	48.904	GPS Tadoo Malra	A.V.Post
148	Majeed Ur Rehman	M.Gulzar	Namal	48.862	GPS Beri Bagla	A.V.Post
149	Faisal Mehmood	Fazul ur Rehman	Nahia Gali	48.81	GPS Kari Sarfali (N.Gali)	A.V.Post
150	Jund Ahmad	M.Miskeen	B.Altal Khan	48.791	GPS Benani (N.Tulal)	A.V.Post
151	Safeer Khan	Kala Khan	Langrial	48.643	GPS Thipper	A.V.Post
152	M.Anil	Ghulam Mustafa	Dawal Manal	48.602	GPS Chah Baltangi (N.Tulal)	A.V.Post
153	M.Abas	M.Yaqoub	Phalkote	48.577	GPS Ram Kole (Pluck)	A.V.Post
154	Ibrar Ahmad	M.Kala Khan	Pawa	48.473	GPS Charan	A.V.Post
155	Znheer Gul	Sabir Hussain	Nawan Shehr	48.433	GPS Andar sari (Pluck)	A.V.Post
156	Shabir Ahmad	Kala Khan	Dakota	48.393	GPS Patta Doga	A.V.Post
157	Zubair Khan	Mirza Khan	Nawan Shehr	48.375	GPS Aarwar (Pluck)	A.V.Post
158	Abdul Shakoor	Zardad Khan	Bagh	48.347	GPS Kather Bagh	A.V.Post
159	M.Rozwan	Rajir M.Sehran	Pawa	48.322	GPS Sargal	A.V.Post
160	Javed Akhtar	M.Zaman	Majuhan	48.22	GPS Katha (Nara)	A.V.Post
161	Wajid Ali	M.Aaghar	Beran Gali	48.217	GPS Jandar Dakki Kukmong	A.V.Post
162	Naveed Khan	Shah Dad Khan	Langra	48.115	GPS Dharian Rahi	A.V.Post
163	Waqar Ahmad	M.Ishaq Khan	Salthad	48.085	GPS Lower Malkole	A.V.Post
164	Hafeez ur Rehman	Abdul Majeed	Nagri Bala	48.056	GPS Riyala Salkote	A.V.Post

DISABLED MERIT

1	Asif Iqbal	Abdur Razaq	Kuthwal	50.107	GPS Nammal	A.V.Post
2	Saif ur Rehman	Fazul ur Rehman	Nagri Bala	48.515	GPS Dakhan Tupla	A.V.Post
3	Gul Khatab	Ali Afsar	Dawal Manal	48.258	GPS Nagri Payeen	A.V.Post
4	M. Shoab	Bashir Muhammad	P.K.Khan	42.327	GPS Sari Sher Shah	A.V.Post
5	Mujahid Khan	Falz Akbar Khan	Jhangra	41.559	GPS Langia Syden	A.V.Post
6	M.Aqeel Khan	M.Firdous Khan	Chmahad	40.384	GPS Shadal	A.V.Post

Union Council Merit

SNO	Name of Candidate	Father Name	Name of UC	Merit Position	Place of posting	Remarks
1	M. Mazhar	M. Ishaq	B.P.Khan	45.96	GPS Lundi Mundri	A.V.Post
2	M. Naseer	M. Fard	B.P.Khan	43.651	GPS Tarhatti	A.V.Post
3	Yasir Mehmood	Saidar Khan	Bagh	47.872	GPS Kohalian	A.V.Post
4	M Saad	Issam Dad	Bagh	47.138	GPS Kohalian	A.V.Post
5	Babar Ali	M. Afsar	Bagh	45.766	GPS Sarian (Bagh)	A.V.Post
6	Itakhar Ahmad	M.Afsar	Bagh	44.783	GMPS Basian De Kari	A.V.Post
7	M. Javed	M.Ajab	Bagh	43.809	GMPS Danna Pattan Khurd	A.V.Post
8	M Saleem Awan	Aurang Zeb	Bagnotar	43.947	GMPS Doota Khan Kalan	A.V.Post

6-D

9	Rashad Hussain	Habib Ur Rehman	Bagnolar	43.211	GPS Paulhak	A.V.Post
10	Junshaid	Hasan Din	Bagnolar	42.784	GPS Topa Khan Kalan	A.V.Post
11	Chananzfar Habib	Obed ur Rehman	Bakole	47.201	GPS Lceran Syydan	A.V.Post
12	Muhammad Shakeel	Muhammed Asghar	Bakole	46.319	GPS Moolia	A.V.Post
13	M.Faheem ud Din	Muhammad Nazir	Bakole	43.638	GPS Sari Khan Kalan	A.V.Post
14	Muhammad Allab	Khan Akbar	Bakole	42.58	GPS Marn Bakote	A.V.Post
15	Ghulam Mustafa	Abdur Razaq	Bakole	40.702	GPS Danna Khan Kalan	A.V.Post
16	Waseem Akhtar	M.Iqbal	Baladhari	43.403	GPS Talkandi	A.V.Post
17	Shakeel Ahmed Mushlag	M.Younas Mushlag	Beran Gali	46.479	GPS Keri	A.V.Post
18	Amjad Ah	Hukkam Dad	Beran Gali	45.464	GMPS Takora	A.V.Post
19	M.Munger	M.Akbar	Birote	48.173	GPS Sungrary	A.V.Post
20	M.Usman	M.Rafique	Birote	45.14	GPS Muhra (Dirote)	A.V.Post
21	M.SHAFIQUE	GOHAR REHMAN	BOI	47.82	GPS Bagholar	A.V.Post
22	M.Sabir	M.Miskeen	Bol	45.818	GPS Nakka Bol	A.V.Post
23	S.Munir Hussain	S.Ali Akbar Shah	Bol	44.489	GPS Daedal	A.V.Post
24	Muhamad Hanif	Ghulam Rasool	Bol	43.277	GPS Kukmar	A.V.Post
25	S.Mujtaba Hussain	S.Parvez Hussain Shah	Bol	43.063	GPS Sehali Dalola	A.V.Post
26	Nisar Ahmed	M.Akram	Chmahad	45.208	GPS Ballangi No.2	A.V.Post
27	Sanaullah Khan	Khalid Khan	Chmahad	44.996	GPS Bagh Dara	A.V.Post
28	M. Ashfaq	All Kahn	Dalola	46.807	GPS Sehali	A.V.Post
29	M. Akram	Amir Afzal	Dalola	45.793	GPS Dara Dalola	A.V.Post
30	M. Saraj	M. Younis	Dalola	43.773	GPS Budhar	A.V.Post
31	Naseem Ahmed	Skandar	Dalola	39.84	GPS Palla Doga	A.V.Post
32	Abdul Salam	Abdul Ghani	Dawal Manal	47.819	GPS Makool Pine	A.V.Post
33	M.Shafique	Zardad Khan	Dawal Manal	47.456	GPS Thoa	A.V.Post
34	Babar Zeb	Aurang Zeb Khan	Dhamtour	47.594	GPS Gal Dhoke	A.V.Post
35	Qaiser Mehmood	M. Shafi	Dhamtour	45.672	GPS Nakar kulbal	A.V.Post
36	Zia ur Rehman	Adalat Khan	Dhamtour	45.599	GPS Badhair (N.Gali)	A.V.Post
37	Ghulam Murtaza	Ayub Khan	Dhamtour	44.015	GPS Majhot Bejute	A.V.Post
38	Abid Khan	M.Afsar Khan	G.P.Gran	46.902	GPS Bagal No.2 Phallah	A.V.Post
39	Rashid Khan	Bilal Khan	G.P.Gran	46.899	GPS Bagal No.2 Phallah	A.V.Post
40	M.Nisar	Kareem Dad	Goreeni	47.717	GMPS Kolherian	A.V.Post
41	Abid Ali	M. Saeed	Goreeni	44.331	GPS Bashkofi	A.V.Post
42	Nasir Mehmood	M. Riazat	Goreeni	44.094	GMPS Palkan	A.V.Post
43	Malik Kashif AWAN	Ghulam Sarwar	Jarral	47.424	GPS Nakhy Saudan	A.V.Post
44	Sohail Mehboob	Mehboob Hussain	Jurra	45.618	GPS Mukdabi	A.V.Post
45	Babar Khan	Wajayal Khan	Jhangl	45.695	GMPS Kalas Bakote	A.V.Post
46	Kashif Zeb	Qazi Aurangzeb	Jhangl	44.638	GMPS Kokka Khan Kalan	A.V.Post
47	Naveed Asghar	Wazir Muhamamd	Jhangi	44.19	GMPS Mohradi	A.V.Post
48	Mushlag Ahmed	Milan Dad	Havelian	46.97	GPS Kusaki Kalan	A.V.Post
49	M.Iqbal	Abdulah	Kukmang	43.144	GPS Pulhair Bandi	A.V.Post
50	Akhtar Zeb	Jehanzeb	Kuthiala	39.938	GPS Satyct	A.V.Post
51	Bilawar Shah	S. Zaman Shah	Kuthiala	36.924	GPS Pawsal Kuthiala	A.V.Post
52	Fazal-e- Razaq	Abdul Ghani	Kuthwal	47.585	GPS Basala	A.V.Post
53	M.Gulfraz	Zain Muhd.	Kuthwal	47.58	GMPS Jabri Kurh	A.V.Post
54	M. Salm	Abdur Rehman	Kuthwal	46.902	GMPS Lceran	A.V.Post
55	Rafiqat	M. Azad	Langra	44	GPS Dharian Rahi	A.V.Post
56	Ajab Khan	Munir Khan	Langrial	46.38	GPS Dubran	A.V.Post
57	M. Sharaqul	Kerem Elah	Langrial	40.347	GPS Sumbal	A.V.Post
58	Amjad Hussain	Aziz ur Rehman	Lora	42.629	GMKS Malch Lora	A.V.Post

Handwritten signature and initials, possibly "Abid Ali" and "M. Saeed", with a date "20/11/2024".

6-E

59	M.Faisal Abbasl	M.Yousaf Abbasl	Lora	41.613	GPS Dharan Phallah	A.V.Post
60	M.Naveed Gul	Gul Dad Khan	Malik Pura	45.651	GPS Halrol Berote	A.V.Post
61	Tanveer Ahmed	M.Yousaf	Mir Pur	39.768	GPS Hal Tarmutian Berote	A.V.Post
62	Irshad Ahmad	Tal Muhammad	Nagri Bala	47.952	GPS Galalan De Dakki	A.V.Post
63	Nazir Ahmad	M.Ramzan	Nagri Bala	44.83	GPS Sial Khan Lora	A.V.Post
64	M. Fazal	M. Yaqub	Nagri Bala	43.442	GPS Kalkote Lora	A.V.Post
65	Aamir Mahmood	M.Riaz	Nagri Tutial	47.81	GPS Balkanala	A.V.Post
66	M Wejo	Sakhi Muhammad	Nagri Tutial	45.292	GPS Hallan Sughanz	A.V.Post
67	Abdul Qadeer	Muhammad Ayyub	Nagri Tutial	42.936	GPS Panjoth	A.V.Post
68	M Adil	Lal Khan	Namal	46.378	GPS Akhore No.2	A.V.Post
69	Tanveer Hussain	Gul Zaman	Namal	46.303	GPS Kuril Majuhan	A.V.Post
70	Habibur Rehman	M.Gul Zar Khan	Namal	46.075	GPS Lanqa Leol	A.V.Post
71	M Aseem	M.Akram	Namal	46.037	GPS Bari Bagla	A.V.Post
72	Ehsan	M.Sharif	Namal	45.73	GPS Kuril Majuhan	A.V.Post
73	Yazar Ali	Muzar Hussain	Namil Malra	45.421	GPS Dannah Lora	A.V.Post
74	Gul Farez Ahmad	Karam Khan	Namil Malra	44.064	GPS Dannah Lora	A.V.Post
75	M.Muhammad Naheem	M.Bashir Hussain	Namil Malra	43.783	GPS Karaga Lora	A.V.Post
76	Javon Akhtar	Fazul ur Rehman	Nara	47.932	GPS Chalan Ahmad Khan	A.V.Post
77	M.Irwan	M.Muzaffar	Nara	47.718	GMPS Kote	A.V.Post
78	Khaliq Mehmood	M.Yaqoob	Nara	47.644	GMPS Puryan Wala	A.V.Post
79	Imtiaz ur Rehman	Munawar Khan	Nara	43.276	GPS Nagri Tutial	A.V.Post
80	Shabir Ahmad	M.Yaqoob	Nathia Gali	47.738	GPS Khatar Bagan	A.V.Post
81	M Munir	M.Younis	Nathia Gali	47.537	GPS Dakhan Bagan	A.V.Post
82	Abdur Rehman	M. Ramzan	Nathia Gali	45.997	GPS Rala Bagla	A.V.Post
83	Ennaris Khan	Anil Khan	Nathia Gali	44.417	GPS Mulan Da Barian	A.V.Post
84	Azhar Mehmood	Nazir Ahmed	Nathia Gali	43.579	GPS Kundla	A.V.Post
85	Rizwan Sultan	M.Sultan	Nawan Shehr	47.878	GPS Dhural Khasa (Chambad)	A.V.Post
86	Sanaullah Khan	Jhangir Khan	Nawan Shehr	46.428	GPS Bandi Saydan	A.V.Post
87	Safeer Ahmad	Mir Hussain	P.K.Khan	42.893	GPS Pand Ganda	A.V.Post
88	M. Arshad	Sultan Yousaf	P.K.Khan	36.458	GPS Thali Sydan	A.V.Post
89	M.Naveed	M.Younis	Pattan kalan	47.824	GPS Bandi Sarra	A.V.Post
90	M Naseer	M.Nazeer	Pattan kalan	44.533	GPS Batangi Khurd (P.kalan)	A.V.Post
91	Abdul Latif	Qasim Khan	Pattan kalan	41.286	GMPS Danna (Pattan Kalan)	A.V.Post
92	M. Asif	Fazl Alam Khan	Pattan kalan	39.189	GPS Gahler	A.V.Post
93	Amjad ur Rehman	Ali ur Rehman	Pawa	47.254	GMPS Patheti	A.V.Post
94	Tariq	Rehamatullah	Pawa	45.053	GPS Pehal	A.V.Post
95	Ishtaq Ahmed	Fazal ur Rehman	Pawa	45.036	GPS Sial	A.V.Post
96	Safdar Ur Rehman	Noor Zaman	Phalkote	44.103	GPS Jandar Bar	A.V.Post
97	Tanveer Ahmed	M.Sadiq	Phalkote	42.505	GPS Upper Malsa	A.V.Post
98	Zaheer ahmed	M.Nazeer	Phalkote	41.009	GPS Jandar Bari	A.V.Post
99	M.Naveed	Shah Zoman	Phalkote	40.689	GPS Riyala Pluck	A.V.Post
100	M Khaqan	Zar Muhammad	Phallah	47.616	GPS Tarela Bagla	A.V.Post
101	Ishtaq Ahmed	Abdur Razaq	Phallah	45.81	GPS Chan Kote	A.V.Post
102	Ziafat Ali	M. Ziaraf	Phallah	43.174	GPS Kund Batal	A.V.Post
103	Saqain Hussain	S. Rahat Shah	Phallah	41.431	GPS Kangar Maira	A.V.Post
104	Rafaqat Ali	Sarfaraz Khan	Phallah	41.13	GPS Sandari	A.V.Post
105	M. Ishtaq	Gulfaraz Ahmed	Pluck	43.316	GPS Khushi Kote	A.V.Post
106	M. Farid	Zain Muhammad	Sarbana	46.058	GPS Sabal	A.V.Post
107	Majid Khan	M.Rizwan	Seer Ghrbi	48.053	GPS Neelo	A.V.Post
108	M.Tofail	Abdul Latif	Seer Sharqi	48.055	GPS Dhara	A.V.Post

6-F

109	Nawaz Muhammad	Muhammad Khan	Sherwan	47,995	GPS Bnrj Gait Kuthala	A.V.Post
110	B. H. Ahmad	Khandad Khan	Sherwan	47,254	GPS Salyat Kuthala	A.V.Pdsl
111	Sajid Ahmad Khan	Anwar Zeb Khan	Sherwan	47,25	GPS Mukdabi	A.V.Post
112	Khadir Rehman	M. Sarwar	Tajwal	42,605	GPS Tupla	A.V.Post
113	M. Zahcer	M. Khan	Tajwal	41.2	GPS Gadar	A.V.Post

TERMS AND CONDITIONS

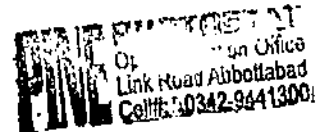
1. The appointees will get initial allowances as admissible to them under the Rules. They will be entitled for annual increments as per relevant Govt Policy, however they will not be eligible for pension and gratuity as per current policy of the Govt. of KPK.
2. Their services will be considered/dealt as per rules and regulations of the Govt. of KPK.
3. Their services will liable to be terminated on one month's prior notice from either side. In case of resignation without prior notice their one month pay/allowances, if any shall be forfeited to the Govt. treasury through challan.
4. Contribution of C.P Fund will be as per rules and regulations of the Govt. of KPK.
5. The appointees of summer vacation areas/schools should join their posts with in 15 days of the issuance of this appointment order positively, otherwise the appointment shall stand cancelled. However, the appointees of winter vacation areas/schools will take over charge of their posts at the end of winter vacations with in 15 days.
6. Their services will liable to be terminated at any time provided their performance is found unsatisfactory and they will be proceeded against as per rule/policy invogue.
7. The ADOs/Clusters Incharge concerned should personally check their original certificates / diplomas / degrees and Domicile prior to handing over the charge.
8. The overage appointees if any should not be handed over charge, as the prescribed age limit will be considered as per PSTs appointment policy/criteria.
9. The appointees will not apply for any transfer for a minimum period of 2 years as any request/appeal in this regard shall not be entertained.
10. Charge reports should be submitted to all concerned.
11. No TA/DA is allowed.

(Shamas Khan Shams)
Executive District Officer
(E & SE) Abbottabad

Endst: No. 17946-18230

Dated A/Abad the 21.12.2010

- Copy to the: -
1. Director Elementary & Secondary Education Department KPK Peshawar
 2. District Coordination Officer Abbottabad.
 3. Executive District Officer (F&P) Abbottabad.
 4. District Accounts Officer Abbottabad.
 5. PA to Secretary E&SE KPK Peshawar
 6. District Officer (M&F) E & SE Abbottabad.
 7. Deputy District Officer (M&F) local office.
 8. Budget & Accounts Officer Local Office.
 9. Clusters Incharge/ADO Circles.
 10. Candidates concerned.
 11. Office order file.



District Officer
(E & SE) Abbottabad.

Attest to be True

DEPUTY SECRETARY (POLICY)
(VAJIDAH LATIF)

[Signature]

ATTESTED

1267
02/08/2020

- 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 Chief Minister, Khyber Pakhtunkhwa.
- 5. The Principal Secretary to Governor, 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, Khyber Pakhtunkhwa Public Service Commission, Peshawar.
- 11. The Registrar, Khyber Pakhtunkhwa Service Tribunal, Peshawar.
- 12. The Secretary, Khyber Pakhtunkhwa E&A Department.
- 13. The Deputy Director (IT), E&A Department.
- 14. All Deputy Officers in Establishment & Administration Department with the request to arrange 20 gazette copies.
- 15. The Section Officer (Admn), Administration Department.
- 16. The Caraker, Administration Department.

Copy is forwarded to:

DATE NO & EVEN DATE

CHIEF SECRETARY
GOVERNMENT OF THE KHAYDAN PAKHTUNKHWA

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

AMENDMENT

Following further amendment shall be made, namely:

(1) The Chief Minister of Khyber Pakhtunkhwa is pleased to direct that in the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the powers conferred by section 26 of the Civil Servants Act No. XVIII of 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973) shall be deleted.

Dated Peshawar, the 06/08/2020

NOTIFICATION

GOVERNMENT OF
KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
(REGULATION-WING)

Annexure - B -

GOVERNMENT OF
KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
(REGULATION WING)

NOTIFICATION

Dated Peshawar the, 06/08/2020

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

AMENDMENT

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

CHIEF SECRETARY
GOVERNMENT OF THE KHYBER PAKHTUNKHWA

(ANDS): & EVEN DATE

Copy is forwarded to :-

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

(WARDAH LATIF)
DEPUTY SECRETARY (POLICY)

Accepted to be True
Copy

Attested to be True
WP4447-2023 AZIZILAH VS GOVT OF POK
2023

Section Officer (Policy)

Section Officer (Policy)

Yours faithfully,

Copy forwarded to the:
1. PG to Special Secretary (Recs), Establishment Department.
2. PA to Additional Secretary (Rec-1), Establishment Department.
3. PS to Deputy Secretary (Policy), Establishment Department.

Under. Of even No & date

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

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

2. The basic rationale behind the debarment of the bid rule is aimed at preventing a civil servant from temptation for which gain by seeking to a single lucrative position or to present those who tend to forge promotion 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.

1. I am directed to refer to your letter No. SO(Primary-MY/AS/17/23 dated 18.04.2023 in 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 the department notification dated 06.08.2020; thus, no provision exists to decline or forgo promotion.

To: The Government of Khyber Pakhtunkhwa, Efficiency & Secondary Education Department.
Subject: CHAIRMAN REGARDING DEBARMENT OF RULE 7(S) IN THE CIVIL SERVICE (APPOINTMENT, PROMOTION AND TRANSFER) RULES, 1989.

GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
No. SO(Policy)/AS/17/2020
Dated Islamabad the 06, 2023



Annexure - C

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

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

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

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

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

Encl: AA

(MUHAMMAD ISHAQ)
SECTION OFFICER (PRIMARY MALE)

Copy forwarded to the:

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

SECTION OFFICER (PRIMARY MALE)

Attested to be True
Copy

B/c -11-

No SO (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, KP

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

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

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

Encl: AA

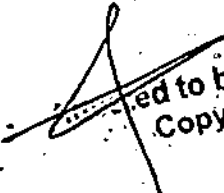
(MUHAMMAD ISHAQ)
SECTION OFFICER (PRIMARY MALE)

Copy forwarded to the:

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

SECTION OFFICER (PRIMARY MALE)

WP4442-2023 AZIZULLAH VS GOVT CP PG43


ed to be True
Copy

MINUTES OF THE MEETING REGARDING APPLICATION SUBMITTED BY MR. AZIZ ULLAH PROVINCIAL PRESIDENT ALL PRIMARY TEACHERS ASSOCIATION KHYBER PAKHTUNKHWA REGARDING DELETION OF RULE 7(5) IN THE CIVIL SERVANT (APPOINTMENT, PROMOTION & TRANSFER RULES 1989).

Annexure
D


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


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

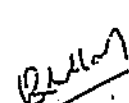
2. The meeting started with recitation from the Holy Quran. The chair welcomed the participants. The Deputy Director (Establishment) of Directorate of Elementary & Secondary Education briefed the forum regarding agenda item in detail.

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

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


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


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


(Mr. Razaqat Ullah)
General Secretary APTA
Peshawar


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

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



-13-
-B/C-

MINUTES OF THE MEETING REGARDING APPLICATION SUBMITTED BY MR AZIZ ULLAH PROVINCIAL PRESIDENT ALL PRIMARY TEACHERS ASSOCIATION KHYBER PAKHTUNKHWA REGARDING DELETION OF RULE 7(5) IN THE CIVIL SERVANT (APPOINTMENT, PROMOTION & TRANSFER RULES 1989).

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

S/1	NAME	DESIGNATION
1.	Mr. Fazal Wahid	Deputy Director Establishment of Directorate Elementary & Secondary Education Department
2.	Mr. Aziz Ullah	Provincial President All Primary Teachers Association: Khyber Pakhtunkhwa
3.	Mr. Razaqat Ullah	General Secretary APTA Peshawar
4.	Muhammad Ishaq	Section Officer (Primary) E&SE Department Civil 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 threadbare discussion it was decided that Directorate of Elementary & Secondary Education Department may examine the case properly and submit a self-contained/consolidated case for onward submission to Establishment Department for further necessary action.

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

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

Provincial President
All Primary Teachers Association
Khyber Pakhtunkhwa

(Mr. Razaqat Ullah)
General Secretary APTA
Peshawar

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

(Abdullah)

Additional Secretary (Establishment)

Attested to be True
Copy



No. 8145

Khyber Pakhtunkhwa, Peshawar

IF No. 34/SST/UG/General/Cases

Dated: 21/7/2023

Phone: 091-9225344

Email: establishmentmale1@gmail.com

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/Minutes of the Meeting/PST/2023 dated 10-07-2023 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) deleted Rule 7(5) in the Civil Servants (Appointment, promotion & Transfer Rules 1989) vide notification No. No. SOR-VI (E&AD)/1-3/2020 dated 06-08-2020.
- That this office sought guidance from your good office in the following words vide letter No.6987 dated 06-02-2023.
 - 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/2-3/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/2-3/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 huge numbers of Female Teachers. Thus it is proposed that Teachers below D/S-16 may be exempted of implications of the amendment in the rules ibid 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.



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

Attested to be True

Copy

-B/C-

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION, KPK

PESHAWAR
(21-7-2023)

To:

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

Subject: Minutes of Meeting

Dear Sir, I am directed to refer to letter No. (SO Primary-M) E&SED/S-1/G/Misc/
Minutes of meeting/PST/2023 dated 30-7-2023 on subject cited above and to
present brief history, about background of case as under:-

- That Government of KP Establishment department (Regulation Wing) deleted rule 7(S) in Civil Servants (Appointment, promotion, Transfer, Rules 1997) vide notification No. No. SDR-VI (E&AD) 1-3/2020 dated 06-08-2020.
- That this office sought guidance from your good office in the following words vide letter No. 6987 dated 06-07-2023
 - (i) Now it is obligatory upon civil servant to accept promotion.
 - (ii) It is prerogative of civil servant to either accept/turndown the offer of promotion.
- That your good office forwarded the same to quonies concerned vide letter No. SO (Primary M) E&SED/2-2/Appointment/2023 for necessary guidance.
- That the government of KP-ED (Regulation Wing) vide letter No. SO (Policy) E&AD/1-3/2020 dated 6-06-2023 categorically stated that there exists no provision to decline /forgo promotion. It is obligatory upon every civil servant to accept promotion under every condition.
- That in light of the minutes of the meeting dated 6-07-2023 held under the Chairmanship of Hon: Additional Secretary, Establishment at his office. This office has been asked for submission of consolidated case.

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

The case is submitted for perusal and necessary actions please.

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

Assistant Director
Elementary & Secondary Education
Khyber Pakhtunkhwa.

Attest to be True
Copy



-16-

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

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

Annexure
E

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)/ E&AD/ 1-3/2020 dated 06th June 2023 and to state that after deletion of rule 7(5) Khyber Pakhtunkhwa Civil Servant (Appointment, Promotion & Transfer Rules 1989) it has been intimated that those officers/ officials who do not comply with promotion order of the competent authority or try to evade promotion through different means shall be proceed under Khyber Pakhtunkhwa Civil Servant (Efficiency & Discipline) Rules, 2011.

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

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


(MUHAMMAD ISMAIL)
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)
23/8/23

Scanned with CamScanner


to be True
(copy)

- B/c - 17 -

No. So (Primary - M) E & SE D / 2-2 /
Appointment - Rule / 2023

Peshawar Dated 23rd August, 2023.

To

The Secretary to Government of Khyber Pakhtunkhwa,
Establishment and Administration Department,
Peshawar.

SUBJECT: - Guidance regarding deletion of Rule 7(S) in the
Civil Servant (Appointment, Promotion & Transfer Rules
1989)

Dear Sir,

I am directed to refer to your letter No. So (Primary) (Policy) / E & AD
/ 1-3 / 2020 dated 6th June 2023 and to state that after
deletion of Rule 7(S) Khyber Pakhtunkhwa Civil Servant (Appointment,
Promotion and Transfer Rules 1989) it has been intimated that
those officers/officials who do not comply with promotion order
of the competent authority or try to evade promotion through
different means shall be proceed under Khyber Pakhtunkhwa
Civil Servant (Efficiency and Discipline) Rule 2011.

In this connection, it is submitted that in some cases lady
teacher of primary level who avail such promotion have to
face serious inconvenience while they have to perform duties
in the remotest stations with no residential / transport facilities.
Most of them are married with kids and elder father of
Mother-in-law who need care. In such cases there are negative
effects on service delivery.
In view of above, the said amendment may be reconsidered to
the extent of lady teacher in primary schools.

Copy forwarded to;

1. Director, E & SE Khyber Pakhtunkhwa.

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

(Muhammad Ishaq)
Section Officer (Primary
Male)

Attested to be True
Copy

Annexure - 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 7(S) IN THE
KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT,
PROMOTION AND TRANSFER) RULES, 1989.

Dear Sir,
I am directed to refer to your letter No. SO(Primary-M)/E&SED/2-
2/Appointment-Rule/2023 dated 23.08.2023 on the subject noted above and to state that
necessary guidance has already been tendered to your good office vide this department letter of
even No. dated 06.06.2023 (copy enclosed).

Yours faithfully,

Section Officer (Policy)

Encl. Of even No & date

Copy forwarded to the:-

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

Attested to be True
Copy

WP442-2023 AZIZULLAH VS GOVT OF PK43

-18-

-19-

- B/c -

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

To

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

Subject

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

Dear Sir,

I am directed to refer to your letter No. SO(Primary-M)/E&SED/2- 2/Appointment-
Rule/2023 dated 23.08.2023 on the subject noted above and to state that necessary
guidance has already been tendered to your good office vide this department letter of even
No. dated 06.06.2023 (copy enclosed).

Yours faithfully,

Section Officer (Policy)

Encls. Of even No. & date

Copy forwarded to the:-

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

Section Officer (Policy)

Attested to be True
Copy

Annexure - G

To,

- 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

Subject: REPRESENTATION AGAINST THE IMPUGNED NOTIFICATION BEARING NO.SO(POLICY)E&AD/1-312020, DATED 06/08/2020, COMMUNICATED TO SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA, ELEMENTARY & SECONDARY EDUCATION DEPARTMENT VIDE LETTER D06/06/2023, WHEREIN IT WAS STATED THAT SUB RULE 5 OF RULE 7 OF KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT, PROMOTION AND TRANSFER) RULES, 1989 STANDS DELETED

Sir/ Madam:-

Your Honorable authority promulgated Notification No. SO (Policy) E&AD/1-3/2020, dated 06/08/2020, communicated to Elementary & Secondary Education vide letter dated 06/06/23 wherein it has been made mandatory to the employees to avail the promotion, otherwise, disciplinary action shall be taken against the employees. 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 Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 vide notification no SOR-VI (E & AD)/1-2/2020 dated 06-08-2020. That the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa 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 Establishment Department vide its letter No. SO.(Policy) E&AD/1-3/2020 dated Peshawar the June 06th, 2023 directed the Directorate of Elementary & Secondary Education 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. That Directorate of Elementary & 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 Rule/2023 dated 23-08-2023 to reconsider the amendment made in Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 as it had negatively affected a large number of teachers and especially female teachers. In the meanwhile, the department vide its letter dated 07th of September 2023 directed the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa 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 Khyber Pakhtunkhwa Civil Servant (Efficiency & Discipline) Rules, 2011.

It is, therefore, humbly prayed that on the acceptance of the instant representation; the Notification bearing No. SO (POLICY) E&D/1-3 1-2020 DATED 06/08/2020, communicated to vide letter dated 06/06/2023, may please be declared and ordered to be struck down being Void, Ultra vires to the Constitution of Pakistan and against the fundamental principles of natural justice.

Dated 10/04/2024

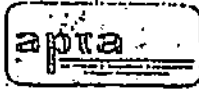
Attested to



Muhammad Shireg
PST
GPS Basala

Khyber Pakhtunkhwa

Prof. Dr. Aziz Khan
President
0333-0114648
azizullah1073@gmail.com
apinkpk



APTA House
Govt. Primary School No.4
Gulbahar Peshwar City.

آل پرائمری ٹیچرز ایسوسی ایشن (اپتا) خیبر پختونخوا

Annexure - A

مہربان: نیکوئی و نیکوئی کے ساتھ ہی ایجنٹیشن خیبر پختونخوا
آل پرائمری ٹیچرز ایسوسی ایشن خیبر پختونخوا
جناب مال

گزارش ہے کہ پروسٹنٹ ہر ادارے میں ہوتے ہیں اور کہ سرکاری ادارہ کی خرابیوں اور ہے پروسٹنٹ کا ایک قانون بنا کر چاہا کہ جو ادارہ ایک اگر کسی
جوہر کے تحت ایک ادارہ پروسٹنٹ میں تو وہ ہر آجہا پارہاں تک پروسٹنٹ میں لے سکتے تھے مطلب پارہاں تک ہر اس کی پروسٹنٹ میں اور کئی
ہر اس قانون میں ترقی و ترقی دہائی کی پارہاں والی بات ہم کو دہائی کی پارہاں ایک ادارہ پروسٹنٹ میں لے لیں تو وہ دوسرے سال لے سکتا ہے
لیکن اب ایک ہفتہ پہلے ایک اور نوٹیفکیشن ہوا ہے
میں کے مطابق اب ہر ادارہ پروسٹنٹ میں لے لیں کے اگر نہیں لیں کے تو اس کے خلاف ای سی ڈی کے مطابق کارروائی کر کے لیا گیا ہے
اور اصل یہ آئی نوٹیفکیشن بنیادی انسانی حقوق کی کئی خلاف ورزی ہے جس کے دور اور ہندی قانون میں خاص کر خواتین اساتذہ کو انہی کے مطابق کا
مناہرہ کرنا ہے
بیک عام حالات میں بھی لڑائی پروسٹنٹ اور دوسرے بیجا بنی بنیادی انسانی حقوق کی خلاف ورزی ہے کیونکہ خیبر پختونخوا میں بدقسمتی سے خواتین دشمنی
کی ہوتی ہے ایسے حالات میں یہ نیا نوٹیفکیشن جو E&SB کی بنیاد پر لیکر کی ترقی میں لیا گیا ہے جو بدقسمتی اور بنیادی انسانی حقوق کی خلاف ورزی
ہم اس کے خلاف قانونی طور پر کوشش کریں گے
لہذا ہم آپ سے درخواست کرتے ہیں کہ نوٹیفکیشن کو واپس لیا جائے یا اس میں ترمیم کریں پرائمری اساتذہ کو (Relaxation) دیا جائے اور ان کو
رہنما پروسٹنٹ لینے کی ہلکتے ہوں کہ مرضی سے لینے دیا جائے
اور پرائمری ٹیچرز کی صورت میں ہر ادارہ لیا جائے لیکن یہ لڑائی کی جائے
اس سلسلے میں آپ ہر ادارہ (DEO) ای ای اور ایک نمبر اس امر سے متعلق ہادی کیا جائے تاکہ اساتذہ میں پمیل ایجیل پرائمری اساتذہ کو ذہنی
البتہ اور ہر ایک سے لیا جائے
کہ نوٹیفکیشن ہادی ہوتے ہی پرائمری اساتذہ کو ذہنی طور پر لڑائی کرنا کا سلسلہ شروع ہو چکا ہے
لہذا ہم یہ توقع رکھتے ہیں کہ آپ صاحبان ذہنی ایجنٹیشن کے سب سے بڑے پرائمری اساتذہ نمبر ایجیل پرائمری اساتذہ کو اس ذہنی البتہ سے نجات دلائیں گے

شکریہ

میرزا اللہ خان سہانی صدر
آل پرائمری ٹیچرز ایسوسی ایشن خیبر پختونخوا

Attested to be true
copy

VAKALAT NAMA

BEFORE THE SERVICE TRIBUNAL PESHAWAR

Muhammad Shirez

Appellant

Versus

Government of KP & others

Respondents

I (the Appellant)

do hereby appoint and retain

MUHAMMAD MUAZZAM BUTT ASC. MUHAMMAD ADEEL BUTT AHC

BASSAM AHMAD SIDDIQUI AHC

&


ASSOCIATES OF MUAZZAM LAW FIRM

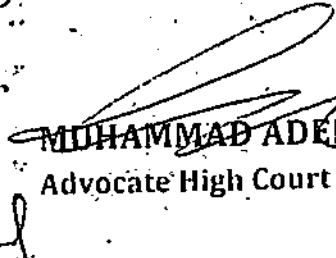
to act and appear for me in the above Suit and on my behalf to conduct and prosecute (or defend) the same and all proceedings that may be taken in respect of any petition connected with the same or any decree or order passed therein and Applications for review to file and obtain return of documents, and to represent me/us and to take all necessary steps on my/our behalf in the above matter.

I agree to ratify all acts done by the aforesaid Advocate in pursuance of this Authority.


APPELLANT

ACCEPTED


MUHAMMAD MUAZZAM BUTT
Advocate Supreme Court


MUHAMMAD ADEEL BUTT
Advocate High Court


BASSAM AHMAD SIDDIQUI
Advocate High Court