

**BEFORE THE HONORABLE SERVICE TRIBUNAL, KHYBER  
PAKHTUNKHWA PESHAWAR**

Service Appeal No 112 /2022

**Faris Khan.....Appellant**

**V E R S U S**

**The Secretary (E&SE) & others ..... Respondents**

**I N D E X**

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Through: Appellant

*Bis*  
(BISMILLAH JAN WAZIR)

& *Bashir*  
(BASHIR KHAN WAZIR)

Advocate,  
High Court, Peshawar

Dated:- 13.07.2022

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**BEFORE THE HONORABLE SERVICE TRIBUNAL, KHYBER  
PAKHTUNKHWA PESHAWAR**

Service Appeal No \_\_\_\_\_/2022

Faris Khan, Serving as TT GPS Baz Muhammad District  
Mohmand

.....Appellant

**V E R S U S**

1. The Secretary (E&SE) Department Khyber Pakhtunkhwa,  
Peshawar
2. The Director (E&SE) Department Khyber Pakhtunkhwa,  
Peshawar
3. District Education Officer (Male) District Mohmand.

.....Respondents

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**SERVICE APPEAL UNDER SECTION 4 OF KHYBER  
PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974,  
WHEREBY THE APPELLANT WAS DEPRIVED FROM  
PROMOTION INSPITE OF THE FACT THAT THE  
APPELLANT WAS QUITE ELIGIBLE FOR PROMOTION  
W.E.F 03.12.2021 FOR THE POST OF SENIOR  
THEOLOGY TEACHER BPS-16, HOWEVER THE NAME  
OF THE APPELLANT WAS NOT CONSIDERED FOR  
PROMOTION, INSPITE OF THE FACT THAT THE  
COMPETENT AUTHORITY FORWARDED THE REQUEST  
FOR PROMOTION OF THE APPELLANT.**

**Prayer in Appeal:**

On acceptance of the instant Appeal, the Appellant  
being eligible and entitled for the post of Senior Theology

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/

**Teacher (STT) BPS-16 w.e.f 03.12.2021 as per Seniority list, but the Respondents violated the Seniority of the Appellant, therefore, the Respondents may very kindly be directed to promote the Appellant w.e.f 03.12.2021.**

**Respectfully Sheweth:-**

The Appellant humbly submits as under:-

1. That the Appellant is peaceful and law abiding citizen of Pakistan and is entitled for all the rights guaranteed by the Constitution of Islamic Republic of Pakistan, 1973.
2. That the Appellant was appointed as Theology Teacher on 15.01.2016 after the completion of all codal formalities, the merit list was prepared according to the Merit position and thereafter the Appointment order of the Appellant was issued. **(Copy of the Merit List and Appointment order dated 15.01.2016 are attached as annexure A).**
3. That the Appellant assumed the charge of post of TT BPS-15 and was performing his duties with great zeal and zest and to the entire satisfaction of his high ups.
4. That the Respondent No 2 placed the seniority list for promotion of the Theology Teachers (TT) BPS-15 with recommendation of being promotion to the post of STT BPS-16, in which the name of the Appellant was placed at serial No 9 and after conducting of DPC the name of the Appellant was even not consider for promotion, inspite of the fact that there were 8 vacant positions of the post of STT BPS-16, however only 5 candidates had been recommended for promotion. **(Copy of the Seniority list is attached as annexure B).**

5. That consequent upon the recommendation of the Departmental Promotion Committee, the competent Authority while issued the impugned order dated 03.12.2021 whereby combined promotion to the next higher post of the candidates have been issued. **(Copy of the order dated 03.12.2021 is attached as annexure C)**
  
6. That the Appellant, while pointed out the Irregularities and illegalities in the promotion list to the competent authority and one Rooh Ullah which is placed at Serial No 6 in the list was terminated and inspite of his termination order provided to the competent authority his name was placed before the DPC and the Appellant when pointed out the name and termination order of the said Rooh Ullah even then they have been ignored the request of the Appellant and placed the name of said candidate and if his subject name was not placed before the DPC the Appellant would have been considered and promoted to the post of STT BPS-16. **(Copies of the Relevant record are attached as annexure D)**
  
7. That the Appellant repeatedly submitted his requests to the Respondents for promotion w.e.f 03.12.2021 from which his colleagues have been promoted which were endorsed by the Respondents and forwarded further for recommendation and even it was pointed out to the competent authority that the Appellant was eligible to be promoted on the post of STT BPS-16 w.e.f 03.12.2021. **(Copies of the Applications and recommendations of the competent authority are attached as annexure E)**

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8. That the Respondents inspite of realizing the eligibility and entitlement of the Appellant for promotion to the post of STT BPS-16 and having recommendation for further promotion, even then the Appellant was ignored and thereafter the Appellant submitted Departmental Appeal on dated 08.03.2022 to the Respondent, No 1 which has been endorsed, but till date no order of promotion has been issued. **(Copy of the Departmental Appeal is attached as annexure F)**
  9. That on the complaint of Appellant inquiry committee was constituted to probe into the matter.
  10. That after conducting proper inquiry the inquiry committee recommended the Appellant to be promoted for the post of STT, however, till date the Appellant was not promoted and on 03.12.2021 STT Teachers was promoted from TT to STT.
  11. That the Respondent No 2 also recommended the Appellant to be promoted from TT to STT but till yet no promotion order has been issued in favour of the Appellant.
  12. That feeling aggrieved from the act of Respondents, the Appellant having no other adequate and efficacious remedy, approaches this Honourable Tribunal on the following grounds inter-alia:-

**GROUND:-**

- A) That the Appellant is peaceful and law abiding citizen of Islamic Republic of Pakistan and is fully entitled to all
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the basic and fundamental rights as enshrined in the fundamental law of the state, interpreted and guaranteed by the law of the land.

- B) That the acts of the Respondents of not following the same criteria which has been safeguarded by the law and rules, while in the instant case the respondents have not yet been considered the case of the Appellant, which is illegal, unlawful, unnatural, ab-initio, null and void in the eye of law, hence liable to be declared so.
- C) That it is pertinent to mention here that the Appellant was eligible and entitled for promotion on the date, whereby his other colleagues have been placed before the DPC and were promoted, however the name of the Appellant was mentioned at Serial No 9, after the exclusion of Terminated Employee, he was quite eligible to be consider for promotion to the post of STT BPS-16 but due to the wrong and terminated candidate was mentioned at Serial No 6, the name of the Appellant was even not considered by the DPC for promotion, therefore the Appellant was treated malafidely and violated his fundamental rights.
- D) That the fundamental rights of the Appellant has blatantly violated by the Respondents and the Appellant has been discriminated and has been denied his due rights under the Constitution of Islamic Republic of Pakistan, 1973.
- E) That the Appellant is not treated in accordance with law, rules and Regulations.
- F) That the Appellant is appointed according to rules and on adopted procedure by the respondents and after his appointments he has never ever given an opportunity of any complaint to the respondents and performed his duties with full devotions, the Appellant being eligible

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for Promotion being most Senior employee of the Respondents Department serving in the Respondents Department since 2016.

- G) That the Applications and Appeal of the Appellant was properly examined along with record and reach to the conclusion, the right of promotion of the Appellant has been realized and recommended for promotion but till date the Respondents are even not implementing their commitments which is against the rules, law and regulations.
- H) That any other ground not raised here specifically may graciously be allowed to be raised at the time of arguments.

**PRAYER:-**

It is, therefore, most humbly prayed that, On acceptance of the instant Appeal, the Appellant being eligible and entitled for the post of Senior Theology Teacher (STT) BPS-16 w.e.f 03.12.2021 as per Seniority list, but the Respondents violated the Seniority of the Appellant, therefore, the Respondents may very kindly be directed to promote the Appellant w.e.f 03.12.2021.

Any other relief, not specifically asked for may also graciously be extended in favour of the Appellant in the circumstances of the case.

Appellant  
Through: 

**(BISMILLAH JAN WAZIR)**

&

  
**(BASHIR KHAN WAZIR)**

Advocate,

High Court, Peshawar

Dated:- 13.07.2022

**CERTIFICATE:**

It is certified that no such like Appeal has earlier been filed before this Hon'ble Tribunal.

  
**DEPONENT**

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

Service Appeal No. \_\_\_\_\_/2022

Faris Khan .....Appellant

Vs

Government of Khyber Pakhtunkhwa & others  
.....Respondents

**AFFIDAVIT**

I, **Faris Khan** S/o Shan Badhsah R/o Post Office Yakaghund Tehsil Pindyali District Mohmand, do hereby solemnly affirm and declare on oath that the contents of the **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

*Faris*  
**DEPONENT**



FA 8

RE-INTERVIEWED/VERIFIED OPEN MERIT LIST OF TT (MALE) CANDIDATES OF MOHMAND AGENCY FOR FRESH APPOINTMENT (RE-INTERVIEWED BY THE ENQUIRY COMMITTEE W.E.F 11/12/2015 TO 22/12/2015)

S. No	Name	F/Name	Tehsil	DOB	SSC	Score	FA	Score	DA	Score	MA	Score	MCQ	Score	Ver	Ext	Total	Remarks	Remarks of the Enquiry Committee
1	Siazat Shah	Ziaat Saib	Halmra	11.4.84	641	12.23	171	15.00	111	13.55	128	14.27	118	12.50			74.03		Verified
2	Abdul Wahid	Gul Jan	SAFI	12.8.85	513	12.07	490	10.2	110	10.65	113	13.27	430	10.75			64.75		Verified
3	Faris Khan	Shah Badshah	Pandakal	13.1.1987	688	13.10	405	13.50	121	11.1	14.5	14.17	424	10.60			64.50		Verified
4	Murtaza Khan	Gul Rahman	SAFI	5.9.82	654	14.53	389	12.97	110	12.00	119	13.11	413	11.11			63.89		Verified
5	Shah Meer Khan	Ghanour Rehman	Ambar	12.12.85	499	11.72	1	14.47	114	11.24	121	14.17	414	11.11			61.52		Verified
6	Abdul Wali Khan	Gul Zaman	SAFI	8.1.87	557	12.38	187	12.0	111	11.19	118	14.13	410	11.0			60.54		Verified
7	Abdul Bari Jan	Meead Gul	Ambar	17.10.86	577	13.58	402	11.45	84	10.13	117	12.23	412	11.05			59.63		Verified
8	Umar Farooq	Gul Rahman	Bazari	13.1.1986	554	12.31	705	12.02	119	11.7	110	14.10	410	10.25			59.32		Verified
9	Amir Nawab	Gul Mohammad	SAFI	15.5.84	560	13.18	591	10.2	116	12.22	111	14.1	410				59.01		Verified
10	Ziaur Rehman	Samiul Haq	SAFI	9.5.84	458	10.78	447	4	1	11.15	111	13.17	410	10.40			58.63		Verified
11	Hameedullah	Shereen Mond	Halmra	2.10.89	518	14.54	129	11.00	111	10.0	111	15.27	414	10.81			58.21		Verified
12	Fiaz Mohammad	Saida Khan	Pandakal	10.12.84	485	11.41	375	12.4	111	11.1	111	13.1	401	10.03			58.15		Verified
13	Ayaz Khan	Qabar Khan	Pandakal	20.3.11	504	11.85	382	12.11	111	11.1	111	13.1	401	10.18			58.09		Verified
14	Hacha Saib	Murad Khan	Pandakal	12.3.85	369	8.68	111	11.1	111	11.1	111	14.1	401	12.20			58.74		Verified

Mr. [Signature]  
 Assistant Director  
 DT (ATA) Peshawar

Mr. Navod Khan  
 Assistant Director  
 DT (ATA) Peshawar

Mr. [Signature]  
 Head Master  
 Mohmand Agency

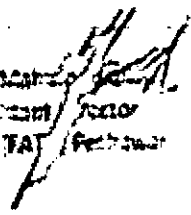
Mr. [Signature]  
 Head Master  
 Mohmand Agency

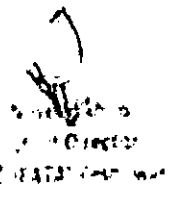
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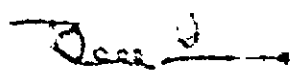
REVIEWED/VERIFIED OPEN MERIT LIST OF IT (MALE) CANDIDATES OF MOHMANI AGENCY FOR FRESH APPOINTMENT (RE-INTERVIEWED BY THE ENQUIRY COMMITTEE W E F 11/12/2015 TO 22/11/2015)

Sl. No.	Name	Grade	Category	Age	Height	Weight	Education	Experience	Remarks
15	Abdul Karim	Asst. Comm.	APN	31.4	512	62.5	B.A.	12.00	Verified
16	Abdul Karim	Asst. Comm.	APN	31.4	512	62.5	B.A.	12.00	Verified
✓ 17	Abdul Karim	Asst. Comm.	APN	31.4	512	62.5	B.A.	12.00	Verified
18	Abdul Karim	Asst. Comm.	APN	31.4	512	62.5	B.A.	12.00	Verified
19	Abdul Karim	Asst. Comm.	APN	31.4	512	62.5	B.A.	12.00	Verified
20	Abdul Karim	Asst. Comm.	APN	31.4	512	62.5	B.A.	12.00	Verified
21	Abdul Karim	Asst. Comm.	APN	31.4	512	62.5	B.A.	12.00	Verified
22	Abdul Karim	Asst. Comm.	APN	31.4	512	62.5	B.A.	12.00	Verified
23	Abdul Karim	Asst. Comm.	APN	31.4	512	62.5	B.A.	12.00	Verified
24	Abdul Karim	Asst. Comm.	APN	31.4	512	62.5	B.A.	12.00	Verified
✓ 25	Abdul Karim	Asst. Comm.	APN	31.4	512	62.5	B.A.	12.00	Verified
26	Abdul Karim	Asst. Comm.	APN	31.4	512	62.5	B.A.	12.00	Verified
27	Abdul Karim	Asst. Comm.	APN	31.4	512	62.5	B.A.	12.00	Verified

  
 Director  
 DE TAT

  
 Director  
 DE TAT







OFFICE OF THE AGENCY EDUCATION OFFICER  
MOHMAND AGENCY AT GHALLANAI  
P.NO.0924290180 FAX:0924290180

### APPOINTMENT ORDER.

In compliance to the decision of the Honorable High Court Peshawar vide Directorate of Education FATA letter No.11547 dated 17/11/2015 and in accordance with the approval of the Departmental Selection committee thereupon verified by the enquiry committee w.e.f. 01/12/2015 to 22/12/2015, The following male candidates of Mohmand Agency are here by appointed against the vacant TT posts purely on temporary basis in BPS-09 @Rs.(8015-495-22865) plus usual allowances as admissible under the rules from the date of their taking over charge in the Schools noted against their names in the interest of public service.

TT= S.No.01 to 14

S.No	Name	Father's Name	Appointed as.	Place of posting.	Remarks
1	Said Ali Shah	Ziarat Said	Theology Teacher	GMS Akhunzadgan	Against vacant post
2	Hameed Ullah	Sherin Muhammad	Theology Teacher	GMS Gahzi Baig	-do-
3	Abubakar Sadiq	Amanat Khan	Theology Teacher	GPS Khuram China	-do-
4	Muhammad Arif	Mir Azam Khan	Theology Teacher	GPS Kamali Yousaf Khel	-do-
5	Abdul Wahid	Gul Jan	Theology Teacher	GHS Sandu Khel	-do-
6	Fazli Wadood	Hazrat Said	Theology Teacher	GPS Kadi No.02	-do-
7	Abdul Khaliq	Oulas Khan	Theology Teacher	GPS Taj Muhammad	-do-
8	Rafi Ullah	Naik Amal	Theology Teacher	GPS Shah Baig Kamali	-do-
9	Faris Khan	Shan Badshah	Theology Teacher	GPS Kadi No.03	-do-
10	Muhammad Tyyeb	Mufti Jan	Theology Teacher	GMS Saparay	-do-
11	Murtaza Khan	Gul Rehman	Theology Teacher	GPS Toor Kore	-do-
12	Abdul Wali Khan	Gul Zamin	Theology Teacher	GPS Sharab Kore	-do-
13	Shah Mir Khan	Ghani ur Rehman	Theology Teacher	GMS Habibzai	-do-
14	Amer Nawab	Gul Muhammad	Theology Teacher	GMS Abdul Baqi	-do-

### TERMS/CONDITIONS

1. The appointment of the candidates has been made purely on temporary basis and is liable to termination at any time without assigning any reason.
2. All academic, professional and domicile documents/certificates of the candidates should be verified from the concerned institutions through AEO office before drawl of their salaries, otherwise the DDO will be held personally responsible for the consequences.
3. Charge reports should be submitted to all concerned in duplicate.
4. Health & age certificates obtained from the Agency Surgeon should be provided to this office.
5. Their age should be with accordance to the Govt: Policy.
6. If they failed to report their arrival within 15 days, their appointment orders will be automatically considered as cancelled.
7. If any legal and technical error/ omission pointed out, the appointment orders will be stand cancelled.


(SAEED GUL)  
Agency Education Officer,  
Mohmand Agency at Ghallanai

Endst: No. Estab: II/TT/Appt/ 451-57 /dated Ghallanai the 15/01/2016. 11

- Copy to:-
1. Director of Education, FATA Peshawar w/r to his No. & date mentioned above.
  2. Political Agent Mohmand Agency.
  3. Agency Accounts Officer, Mohmand Agency at Ghallanai.
  4. Agency Surgeon Mohmand Agency at Ghallanai.
  5. Principals/Head Masters concerned with the direction to follow the terms & conditions in letter and spirit as cited above.
  6. AAEO concerned in this office.
  7. Candidates concerned.

**Note: - Unattested Photo copy is not accepted.**

Hd/

  
Agency Education Officer,  
Mohmand Agency at Ghallanai.

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Name of Applicant

Mr. Fozis Khan

Caste or race

Mohamed

Father's name

Mr. Shan Bad Khan

Residence

Village: Buno Khal, Jandawal  
Tammangy, Tet Panchialy, Dist. Mohawal

Date of birth

01-03-1987

Exact height by measurement

5-8

Personal mark of identification

Wound on Rt. Arm

Signature of the Official

Fozis

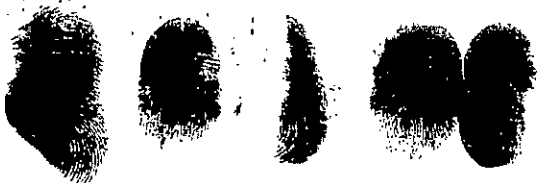
Signature of head of office

Name of Office

I do hereby certify that I have examined Mr. Fozis Khan a candidate for employment in the Office of the Educator Department and can not discover that he had any disease communicable or other constitutional affection or bodily infirmity except

I do not consider this as disqualification for employment in the Educator Department office of the Department. His age according to his own statement is      year and by appearance about      years.

LEFT HAND THUMB AND FINGER IMPRESSIONS



*[Signature]*  
Medical Superintendent,  
Civil Hospital

MEDICAL SUPERINTENDENT  
AHQ HOSPITAL CILLALAWA

من مہتمم فارسی خان نے محکمہ انجمنیہ کے آرڈر نمبر

45-57 تاریخ 16-01-06 کو نوٹیفکیشن سول کورڈری

نمبر 3 میں ایسے نوٹیفکیشن T T کا کارڈ سنبھال لیں

۷ -

فارسی

کارڈ کے دالا

فارسی

کارڈ کے دالا

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**OFFICE OF THE DISTRICT EDUCATION OFFICER TRIBAL DISTRICT MOHMAND  
(SENIOR TT)**

WORKING PAPERS FOR DEPARTMENTAL PROMOTION COMMITTEES FOR THE PROMOTION OF (AT (MALE) POST TO SBT B-16)

Total Number of Vacant Posts of TT	211
1/3 Share of STT	70
Share of STT 10%	21
Already Promoted	72
Available vacant Post of STT	8
Proposed for Promotion	9

**LIST OF TT (M) FOR THE PROMOTION TO STT-16**

S.No.	S.L. No.	Name Official	Place of posting.	Date of birth.	D/O Appointment as regular TT.	Qualification		Whether eligible for promotion.	Remarks
						Academic Qualification	Professional qualification		
								Yes/No	
1	41	Lal Muhammad	GPS Frank Ghar	10/22/1969	11/3/1994	MA	Alama	No	Not recommended due to D/Habib Mado
2	43	Atta Ullah	GPS Dusha Jowara	2/4/1970	11/3/1994	SSC	Departmental Alama	Yes	Deferred due to Rabitool number 1.
3	59	Abdullah	GPS Fata Abad	3/15/1967	2/14/1995	SSC	Alama	Yes	Recommended.
4	94	Hirbullah	GPS Lakara	21.6.1982	22.11.2002	MA HE	MA/BEED	Yes	Recommended.
5	121	Abdul Sadiq	GPS Fata Fata Frank Ghar	5/15/1977	4/30/2007	SSC/MA Islamiat	Alama	Yes	Recommended.
6	129	Rooh ullah	GPS Amal Kore No. 2	1/1/1983	9/1/2007	SSC	Alama	Yes	Not recommended/Deferred due to d/o
7	146	Sard Ali Shah	GPS Ashurazagan	4/11/1984	16/01/2016	MA Islamiat	MA Islamiat/Alama	Yes	Recommended.
8	147	Abdul Wahid	GPS Dama Bin	1/7/1986	16/01/2016	MA HE	Alama	Yes	Recommended.
9	148	Faris Khan	GPS Kadi No 03	3/1/1987	15/01/2016	MA Islamiat	Alama	Yes	X

- It is certified that all the TT (Male General) included in the panel for promotion to the posts of STT B-16:
  - Hold the posts on regular basis and none of them is holding the post on adhoc/contract charge basis/contract.
  - Have completed the required minimum length of qualifying service and qualification as required for promotion to the posts of STT B-16 under the rules.
  - None of them is on deputation to any organization under the federal/provincial/Autonomous/local autonomous/International Organization.
  - Neither any disciplinary/departmental proceedings/Anti corruption/judicial enquiry is pending against them nor has any penalty been imposed upon any one of them during the last five years.
  - No one is on long leave/Ex-Pakistan leave.
  - Their ACPs synopsis are free from adverse remarks.
  - They are all alive and serving.
  - Their service books are enclosed herewith.
  - Their last appointment order are attached herewith.
  - The seniority list of DT teachers is final, undisputed and not subject to change.
- The departmental promotion committee is requested to determine the suitability of the above TT for promotion to the posts of STT B-16.

11/9/21

District Education Officer



C  
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**Directorate of Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar**

**Notification**

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification NoSO(B&A)/1-18/E&SE/2012 dated 11.07.2012 and Finance Department Endorsement No SO(FR)/FD/10-22(E)/2010 dated 16.07.2012, the following CT/DM/TT and AT Male (BPS-15) are hereby promoted to the post of Senior CT/Senior DM/Senior TT and Senior AT (BPS-16) (Rs. 18910-1520-64510) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, as per terms and condition given below with immediate effect and further they will be posted in the Government High /Higher Secondary Schools by the District Education Officer concerned against the vacant post of Senior CT/Senior DM/Senior TT and Senior AT (BPS-16) respectively:

**1. CT to Senior CTs (BPS-16)**

S. No.	S.L. No.	Name of Official	Present Place of Posting	Date of Birth	Date of Apptt; as Regular CT	Remarks
1	66	Fazal Rahman	GHS Rahat Kore	01-03-1968	22-12-2005	Services placed at the disposal of District Education Officer (M) Mohmand for further posting
2	67	Mukhtiar Ali	GHSS Prang Ghar	25-02-1969	30-03-2007	-----do-----
3	68	Sadiq Muhammad	GHS Lakarai	10-06-1962	30-03-2007	-----do-----
4	70	Muhammad Ayaz	GMS Muambar Kalai	25-05-1975	30-03-2007	-----do-----
5	71	Khushdil Khan	GHS Subhan Khwar	02-03-1972	30-03-2007	-----do-----
6	72	Raham Dil	GMS Chaharai	19-05-1971	13-04-2007	-----do-----
7	73	Adnan Khan	GHS Lakarai	02-03-1974	11-05-2007	-----do-----
8	74	M. Nisar	GMS Musa Kore	15-01-1975	16-05-2007	-----do-----
9	76	Jehangir Khan	GHS Yousaf Khel	23-06-1974	20-09-2007	-----do-----
10	79	Javed Khan	GMS Knadi Issa Khel	03-08-1981	30-11-2009	-----do-----
11	80	Hamid Jan	GHS Hasham Kore	01-02-1981	15-12-2009	-----do-----
12	81	Fazli Manan	GHS Qamar Din Kore	04-01-1982	15-12-2009	-----do-----
13	82	Hayat Khah	GMS Musa Kore	02-03-1979	15-11-009	-----do-----
14	83	Imran	GMS Adin Khel	01-01-1985	15-12-2009	-----do-----
15	84	Fazal Hadi	GHS Navi Kalai Laman	11-01-1977	15-12-2009	-----do-----



**Promotion order of Senior Teachers (M) Mohmand 2**

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16	85	Zahid Ahmad	GMS Nao Prang Ghar	09-04-1979	27-01-2010	-----do-----
17	87	Itbar Jan	GHSS Ghallani	07-10-1966	01-03-2012	-----do-----
18	89	Asfandyar	GMS Suran Dara	01-01-1984	04-09-2014	-----do-----
19	90	Arshad Khan	GHS Akhun Zadgan	12-12-1984	16-01-2016	-----do-----
20	93	Sartaj	GMS Ghazi Balq	28-01-1987	16-01-2016	-----do-----
21	94	Munir Khan	GMS Shawa	14-08-1983	16-01-2016	-----do-----
22	95	Muhammad Hashim Khan	GHSS Ghallani	11-04-1983	16-01-2016	-----do-----
23	96	Akbar Khan	GMS Muslim Kore	18-02-1977	16-01-2016	-----do-----

**2. DM TO SENIOR DM BPS-16)**

S. No.	S.L. No.	Name of Official	Present Place of Posting	Date of Birth	Date of Apptt; as Regular DM	Remarks
1	17	Bashir Gul	GMS Kandi Issa Khel	14-09-1974	12-09-2003	Services placed at the disposal of District Education Officer (M) Mohmand for further posting

**3. TT TO SENIOR TT BPS-16.**

S. No.	S.L. No.	Name of Official	Present Place of Posting	Date of Birth	Date of Apptt; as Regular TT	Remarks
1	59	Abdullah	GPS Faiz Abad	15-02-1967	14-02-1995	Services placed at the disposal of District Education Officer (M) Mohmand for further posting
2	94	Hizbullah	GHS Lakarai	21-06-1982	22-11-2002	-----do-----
3	121	Abdul Sadiq	GPS Nao Kalai (Prang Ghar)	15-05-1977	30-04-2007	-----do-----
4	146	Said Ali Shah	GPS Akhun Zadgan	04-11-1984	16-01-2016	-----do-----
5	147	Abdul Wahid	GHS Qamar Din	01-02-1986	16-01-2016	-----do-----

**4. AT TO SENIOR AT BPS-16.**

S. No.	S.L. No.	Name of Official	Present Place of Posting	Date of Birth	Date of Apptt; as Regular AT	Remarks
1	34	Muhammad Zubair	GMS Navi Kalai	04-06-1975	24-04-2007	Services placed at the disposal of District Education Officer (M) Mohmand for further posting
2	37	Hameedullah	GHS Dab Kore	30-11-1982	12-12-2009	-----do-----

**Terms and conditions: -**

- 1 They would be on probation for a period of one year extendable for another one year.

17

- 2 They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 3 Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time by the Government.
- 4 Charge reports should be submitted to all concerned.
- 5 Their Inter-Se- seniority on lower post will remain intact.
- 6 No TA/DA is allowed for joining them duty.
- 7 They will give an under taking to be recorded in their service books to the effect that if any over payment is made to them in the light of this order, the same will be recovered and if anyone is wrongly promoted he will be reversed.

**(Hafiz Dr. Muhammad Ibrahim)**

Director

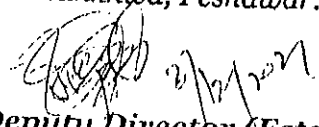
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

Endst: No. 16664-70 / File No.1/Promotion Senior Teachers (PSB-16)2021

Dated Peshawar the 3/12/2021

Copy forwarded for information and necessary action to the:

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. District Education Officer Mohmand.
3. District Accounts Officer Mohmand.
4. Officials Concerned.
5. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
6. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
7. M/File

  
Deputy Director (Estab)  
Merged Districts

Statement

1

18

(19)

I, Mr. Muhammad Ali Khan ADEO (Estab),  
 handed over the Removal order/notice  
 of Mr. Rookhullah IT to Mr. Wakeed  
 ullah dealing clerk on dated 21<sup>09</sup>/<sub>2021</sub>  
 Beside this I had been totally  
 neglected in the whole process of  
 promotion. Therefore, I don't know  
 about the process please.

مستند  
 21/09/2021  
 21/09/2021

25/03/2022

Not Verified

25/03/2022

Signature  
 mine

Ali Khan

آپ کی اطلاع کیلئے عرض ہے کہ SST اور S/Teacher کے درمیان  
 تعلق DPCC 2021-09-01 سے پیش رفتی ہے۔ روح اللہ 25-7-2021  
 آرڈر کے تحت 2021-09-28 کے لئے ملازمت کا نوٹیفکیشن جاری کیا گیا ہے۔  
 فراغت پورے نفاذ کیے۔

اس کے علاوہ یہاں سے سہ ماہی SST 2 سے 8 پوسٹ قابل ترقی  
 کے لئے نام نامی کے ناموں کو Reserve کی طرح ریکارڈ میں  
 لکھ کر ڈالا گیا۔ پھر یہ ڈائریکٹوریٹ کی ذمہ داری ہے کہ  
 وہ اس کے بعد یہ نظر ثانی کر کے DE سے روح اللہ T.T کی  
 ڈیپارٹمنٹ اور ڈائریکٹوریٹ کے نام پر نوٹیفکیشن جاری کیا۔

28/03/22  
 ڈائریکٹر ایجوکیشن  
 ڈیپارٹمنٹ ایجوکیشن



OFFICE OF THE DISTRICT EDUCATION OFFICER  
MOHMAND TRIBAL DISTRICT



Ph: 0924-290180

Email :-deomohmand@gmail.com

No. 9/61-63

Dated: March 25, 2022

20

INQUIRY NOTIFICATION

In pursuance of the letter received from the Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department vide No. Gen/SO(C)/E&SED/KPK/1-7/2022/Mr. Faris Khan/SE-Nill dated 22.03.2022 on the subject noted as "Request for promotion from TT to STT (Lodged by Mr. Faris Khan, TT, GPS Baz Mohammad District Mohmand), the undersigned is pleased to nominate **Mr. Sher Ali Principal GHS Lakarai** to probe the instant case and submit his report within three (03) days positively with clear cut recommendations and also fix responsibilities.

*District Education Officer  
(Male) Mohmand*

Endst No & Date: Even:

Copy forwarded to the:

- 1) Section Officer (Complaints) with his letter No. and date above.
- 2) Director of Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
- 3) Mr. Sher Ali Principal GHS Lakarai.
- 4) PA to DEO (Male) District Mohmand.

*District Education Officer  
(Male) Mohmand*

## NOTIFICATION

1. WHEREAS Mr. Roohullah TT GPS Qamar din Tehsil Safi Tribal District Mohmand was found willfully absent from duty and living abroad since 20/11/2011 by concerned ADEO, (M) and 103 Brigado at Mohmand.
2. AND WHEREAS the accused was proceeded against under Khyber Pakhtunkhwa Govt. Servants (Efficiency & Discipline) Rules 2011, for the charge of "willful absence from duty" as mentioned in the show cause notice served upon him under registered post at his home/School address vide DEO No: 5712-66 AEO(M&E) dated 06/11/2019.
3. AND WHEREAS Mr. Rooh Ullah TT GPS Qamar din Tehsil Safi Tribal District Mohmand did not report to his duty within stipulated period of time and turned his ears deaf.
4. AND WHEREAS Charge sheet was served upon Mr. Roohullah TT GPS Qamar din Tehsil Safi Tribal District Mohmand vide charge sheet No. 6961-66 dated 22/11/2019 through registered post at his home/school address therein the accused was directed to submit reply in his defense through personal contact with the office. But again the absent teacher turned his ears deaf and did not bother to appear before the undersigned.
5. AND WHEREAS DEO office Tribal District Mohmand published an absentee notice against the accused employee in "Daily Express" Peshawar dated 11/12/2019 and "Daily Aaj" Peshawar on dated 14/12/2019 but the accused employee did not appear before the DEO Office.
6. AND WHEREAS the competent authority, the District Education officer Mohmand, after having considered the charges, evidence on record and facts of the case, is of the view that the charge of willful and unauthorized absence against the accused official has been proved.
7. NOW THEREFORE, in exercise of the Powers conferred under Rules-4 (b) iii of Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules 2011, the competent Authority, District Education officer Tribal District Mohmand is pleased to impose major penalty of "Removal from service" upon Mr. Roohullah TT GPS Qamar din Tribal District Mohmand on account of his willful absence from duty with immediate effect.

(Jaddi Khalil) Khali  
District Education Officer,  
Tribal District Mohmand

Endst: No. 09-17 Dated 02/01/2020

Copy forwarded to the:

1. Director Education E&SF, KP Peshawar
2. Deputy Commissioner Tribal District Mohmand
3. District Accounts officer Tribal District Mohmand.
4. PS to Additional Chief Secretary (NMD) for perusal of the Additional Chief Secretary
5. ADEO concerned for entry in his service book
6. Accountant local office for stoppage of his pay forth with.
7. Pay clerk local office for entry in his service book.
8. Official concerned
9. Office record only.

District Education Officer,  
Tribal District Mohmand

O/C 21/1/20

22 اکتوبر 2021 DEO صاحب ضلع لاہور

درخواست جرنل ڈرستنگی DPC سینیاریٹ لسٹ

جناب عالی!

موردبانہ گزارش ہے کہ سائل نے اس سے قبل بھی کئی بار آپکو

زبانی طور پر آگاہ کیا ہے جسے آج جزیعہ درخواست گزارش کی جاتی ہے

کہ حالیہ DPC کیلئے T.T کیڈر کا مرتب کردہ سینیاریٹ لسٹ میں

ایسا ٹرمینٹ ٹیم (روح اللہ T.T) کو شامل کیا گیا ہے جو (02/01/2020) کو  
ٹرمینٹ کیا گیا ہے۔

جس وجہ سے سائل (فارس خان T.T) کا پروموشن سے محروم رہنے کا اندیشہ ہے

اسلئے آپ صاحبان سے درخواست کی جاتی ہے کہ ٹرمینٹ روح اللہ T.T کو

DPC لسٹ سے خارج کریں اور سائل (جو پروموشن کا حقدار ہے) کو DPC

لسٹ میں شامل کرنے کے احکامات صادر فرمائے مشور فرمادیں۔

بندہ صاحبان دعا گو رہے گا۔

العارضی!

المورد = 21/09/2021

Edris

ایچا تابع فرمان معنی فارس خان T.T

APS بازو فور کھیل پلہ عند ضلع لاہور۔

109  
13-12-21

23  
خدمت جناب DEO صاحب ضلع لاہور

Azed

ES-1

درخواست پیرسٹاف کی پروموشن

13.12.21  
جناب عالی

موردیہ گزارش ہے کہ سائل کی تعلق میں آ.آ پوسٹ پر  
ایک فرائض سرانجام دے رہا ہے۔ موجودہ DPC کے لئے جو سنیارٹی لسٹ  
جاری کیا گیا تھا۔ اس میں پروموشن لیٹا گیا ہے اساتذہ مطلوب تھے۔ سائل کے لیے  
پوزیشن پر موجود دو اساتذہ ہیں ایک پروفیسر اور دوسرے اسیاتذہ  
جو مطلوبہ کوالیفیکیشن نہ ہوتے اور سائل قابل ہیں۔ جس کی وجہ سے  
پروموشن کا حقدار ہے لیکن موجودہ DPC میں پروموشن بائیر کیا گیا ہے۔

اس کے

آپ صاحبان سے درخواست ہے کہ سائل کے لئے پروموشن کے

اصحاحات صادر فرمائیں تاکہ وہ سب سے فائدہ مند

ہندہ تاحیات دعاؤں کے ساتھ۔

الوردیہ = 11/12/2021

Edris

العارضی

ایضاً تاریخ فرمان معالج فارسی بیان کی ہے CPS بارڈر فور کونسل لاہور

Jehangir



حکومت جناب ڈائری جنرل صاحب قلمی شیخ نسیم چغتو خواہ

24

درخواست برائے طائفہ پروموشن

3728

ڈائری جنرل صاحب

جناب عالی!

مؤثر بارہ گزارش ہے کہ ضلع گھنڈے کے تعلقہ تعلیم نے اپنے کے حکم

پر مینارٹ کے جو نوٹیفیکیشن جاری کیا تھا۔ اس میں سائل کا نام نویں نمبر 9

وجود ہے جبکہ پروموشن کے لیے آڈٹ اساتذہ مطلوب ہے۔ لیکن سائل سے ایسا

ان آڈٹ اساتذہ میں سے درج اولیہ نام ہے آئی آئی 02/01/2020 میں ڈیفینڈ

کیا گیا ہے جبکہ دوسرے اساتذہ کے آئی آئی کے ساتھ موجود اساتذہ میں سے کچھ بھی نہیں

اب موجود ہے DPC میں سے صرف باقی اساتذہ کو پروموشن کیا گیا ہے باقی نہیں رہا  
ہے۔ جس کے ساتھ ساتھ یہ کہ وہ کچھ نمبر پر پروموشن کیا جائے۔

لہذا آپ صاحبان سے درخواست کی جاتی ہے کہ سائل کے لیے پروموشن کے نام اساتذہ موجود

ہیں موجودہ پروموشن لسٹ میں سے ڈیفینڈ درج اولیہ نام کے ساتھ کے پروموشن  
کے احکامات صادر فرمائیں۔

بندہ تاحیات دعا گو رہے گا۔

الموجود = 13/12/2021

العارضہ

Handwritten signature

ایڈیشنل سیکرٹری / سیکرٹری / ڈائری جنرل صاحب قلمی شیخ نسیم چغتو خواہ



OFFICE OF THE DISTRICT EDUCATION OFFICER  
MOHMAND TRIBAL DISTRICT

Ph. No. : 0924-290180

FAX : 924290180

Email : omohmand@gmail.com

Endst: No. Dated /04/2022



To

The Director Education,  
&SE Khyber Pakhtunkhwa Peshawar.

Subject: **REQUEST FOR PROMOTION FORM TT TO STT (LODGED BY MR.FARIS KHAN TT GPS BAZ MUHAMMAD DISTRICT MOHMAND.**

Memo:

Reference your office letter No. 3398-3401 dated 25.03.2022 on the subject noted above and to convey that the requisite detail report in the subject matter is hereby submitted for your kind information and further necessary action please as under.

1. **WHEREAS** the dealing assistant and the then committee did not updated the seniority list, but Mr, Faris khan TT was included in the working papers for promotion from TT to STT at S.NO. 9 and the working papers were submitted to the Directorate of Education E&SE KPK Peshawar vide this office letter No. 21 dated 04.01.2022 (Annex A).
2. **AND WHEREAS** due to Alamia from Itehadul Maddaris Mr.Lal Muhammad at S.No. 1 was not recommended in the DPC held on dated 01/09/2021 at Directorate of Education E&SE KPK Peshawar while at S.No.6 Mr.Roohullah was declared deferred as his file was missing.
3. **AND WHEREAS** there are eight (8) posts for the promotion of TT to STT and the complainer is at S.No 9. And only five (5) were recommended and promoted to STT on dated 03/12/2021.
4. **AND WHEREAS** there are 08 seats for promotion quota of (STT), S.No.01 (not recommended) and S.No.6 (Removed teacher).

Therefore the undersigned recommends that Mr. Faris khan TT on S.No. 09 may be considered for promotion from TT to STT on promotion quota as per rules/policy and the complainer is already there at S.No. 9 please.

District Education Officer,  
Tribal District Mohmand.

Endst: No. 17056 Dated 21 /04/2022

Copy forwarded to the:

1. Additional Director Education (NMD) KP Peshawar
2. Office Record

District Education Officer,  
Tribal District Mohmand



OFFICE OF THE DISTRICT EDUCATION OFFICER  
MOHMAND TRIBAL DISTRICT  
Ph. No. ☎: 0924-290180  
FAX ☎: 0924290180

Email ✉ :- deomohmand@gmail.com



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/

No. 21 Dated. 4/01/2022

To

The Director Education,  
E&SE Khyber Pakhtunkhwa Peshawar

Subject: **PROVISION OF DOCUMENTS IN R/O DEFERRED OFFICIALS IN DEFERENT CADERRS DISTRICT MOHMAND**

Memo:

A list of deferred teachers in the DPC of District Mohmand for promotion to SCT/SDM/SPET/STT and SAT is hereby recommended and submitted for promotion and further necessary action please.

S.N	Name of Officials	School	Deferred due to	Status	Submission of documents Yes/No	Remarks
<b>CT to SCT</b>						
3	Noor Muhammad CT	GHS Nahqi	Non availability of S/Book	Eligible	Yes	File already provided by this office along with S/B
4	Akhtar Muhammad CT	GHS Pandiali	No CT entry in S/Book	Eligible	Yes	Entry made in S/Book and submitted by this office.
5	Bakht Sher CT	GMS Shawa	File not available	Eligible	Yes	File already provided by this office.
6	Shakir Ullah CT	GMS Hashim kore	File not available	Eligible	Yes	File already provided by this office.
<b>DM TO SDM</b>						
7	Zaheer Ullah DM	GMS Gato warsak		Eligible	Yes	File already check by DPC Committee.
8	Arshad Hussain DM	GMS Shawa	File not available	Eligible	Yes	File already provided by this office.
9	Shahin Shah DM	GHS Lakarai	CNIC	Eligible	Yes	CNIC provided by this office.
<b>AT to SAT</b>						
10	Ashraf Sadiq	GHS Ekka Ghund	Shahdatul Alamia Entry	Eligible	Yes	Entry made in S/Book and submitted
<b>PET TO SPET</b>						
11	Muhammad Ishfaq PET	GMS Akhunzadgan	Share of sanctioned post	Eligible	Yes	Sanctioned post mistake in w/paper is 59, but the sanctioned post of PET is 73.
12	Ijaz Ahmad PET	GHS Pandiali	Share of sanctioned post	Eligible	Yes	Sanctioned post mistake in w/paper is 59, but the sanctioned post of PET is 73.
13	Zakir Hussain PET	GMS Abdul Kore	Share of sanctioned post	Eligible	Yes	Sanctioned post mistake in w/paper is 59, but the sanctioned post of PET is 73.
14	Nasar Khan PET	GHS Sandu khel	Share of sanctioned post	Eligible	Yes	Sanctioned post mistake in w/paper is 59, but the sanctioned post of PET is 73.
<b>TT to STT</b>						
15	Faris Khan TT	GPS Baz Muhammad Kore	Termination of Rosh Ullah TT	Eligible	Yes	The termination order of Rosh Ullah TT already submitted by this office.

District Education Officer (M),  
Tribal District Mohmand

06/08/2021

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OFFICE OF THE DISTRICT EDUCATION OFFICER

MOHMAND TRIBAL DISTRICT

Ph. No. : 0924-290180

FAX : 0924290180

Email : eomohmand@gmail.com



## NOTIFICATION

Without prejudice to legal remedies available to Provincial Government and in pursuance of judgment of the Peshawar High Court dated 19-02-2020 in WP No.5673-P/2019, Sanction is hereby accorded to the encashment of leave in lieu of LPR for 313 days in respect of Mr. Umar Sher S/O Khan Sher TT (BPS-15) GPS Ajmal Kore Tamanzai Tehsil Pandiali Mohmand Tribal District shall stand retired from Govt. Service with effect from 31/12/2020 (AN) on Pre-Mature retirement. Subject, to CPLA/Appeal of the Provincial Government against aforementioned judgment of Peshawar High Court and any order contrary as and when issued by the Apex Court of Pakistan.

His date of birth, 1<sup>st</sup> Appointment date, Retirement date, Length of Qualifying Service & Personal Number are as under:

1. Date of birth: 15/01/1970.
2. 1<sup>st</sup> Appointment: 04/11/1994
3. Date of Retirement: 31/12/2020
4. Length of Service: 26-01-27 (Y/M/D)
5. Personal No. 103923

(NOOR HASSAN KHAN)  
District Education Officer,  
Mohmand Tribal District.

Endst.No. 269-73 /Estab:II/Retirement Dated Ghallana the: 21/01/2021.

Copy forwarded to the.

1. District Accounts Officer District Mohmand.
2. EMIS Concerned.
3. Pay Clerk.
4. Official concerned.
5. Office record.

District Education Officer,  
Mohmand Tribal District.

Hd



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**GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**

**Block "A" Civil Secretariat, Peshawar**

**Phone No. 091-9223540**

No. Gen/SO(C.)E&SED/KPK/1-7/2022/Mr. Faris Khan/SE-Nil      Dated 08.03.2022

To

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

The District Education Officer (Male),  
District Mohmand

Subject: REQUEST FOR PROMOTION FROM T.T TO S.T.T (Lodged by Mr. Faris Khan, T.T, GPS Baz Mohammad District Mohmand)

I am directed to refer to the subject cited above and to enclose herewith copy of a self-explanatory application/complaint along-with its enclosures, lodged by Mr. Faris Khan, T.T, GPS Baz Mohammad District Mohmand, with the request to examine the case as per rules/policy and a detailed report may be submitted to this office within a week time positively, please.

Encl: As Above:

  
(SHAKEEL AHMAD KHATTAK)  
SECTION OFFICER (COMPLAINT)

Endst: of even number & date:

Copy of the above is forwarded to the:

PA to Deputy Secretary (Budget) E&SE Department for information.

  
SECTION OFFICER (COMPLAINT)

29



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Block "A" Civil Secretariat, Peshawar

Phone No. 091-9223540

No.Gen/SO(C.)E&SED/KPK/1-7/2022/Mr. Faris Khan/SE-Nil

Dated 31.05.2022

To

The Director,  
Newly Merged Tribal Districts,  
Elementary & Secondary Education Department,  
Khyber Pakhtunkhwa Peshawar

Subject: REQUEST FOR PROMOTION FROM T.T TO S.T.T (Lodged by Mr. Faris Khan, T.T, GPS Baz Mohammad District Mohmand)

I am directed to refer to the subject cited above and to enclose herewith copy of a Inquiry Report/Recommendations, received from Mr. Sher Ali Principal GHS Lakarai Mohmand on the complaint lodged by Mr. Faris Khan, T.T, GPS Baz Mohammad District Mohmand, with the request to implement the Inquiry Report/Recommendations in true letter & spirit, under intimation to this office within a week time positively, please.

Encl: As Above:

(SHAKEEL AHMAD KHATTAK)  
SECTION OFFICER (COMPLAINT)

Endst: of even number & date:

Copy of the above is forwarded to the:

1. PA to Additional Secretary (Monitoring) E&SE Department.
2. PA to Deputy Secretary (Monitoring) E&SE Department

SECTION OFFICER (COMPLAINT)

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**INQUIRY REPORT**

**AUTHORITY:** DEO(M) Mohmand No 1161-63 dated 25/3/2022  
**VENUES:** Office of the District Education Officer (Male) Mohmand  
**DATED:** 30/03/2022

**ABSTRACT:** Seniority List was not updated by not excluding the terminated teacher, Mr Rooh Ullah Ex-TT GPS Qamar Din Mohmand vide Notification No 9-17 dated 2/1/2020.

**BRIEF HISTORY OF THE CASE:** In pursuance of the letter of Govt of Khyber Pakhtunkhwa E&SED Peshawar Notification No Gen/So(G) E&SED/KPK/1-7/2022/Mr. Faris Khan /SE-Nil dated 22/3/2022 received by hand from Mr Faris Khan TT GPS Baz Muhammad CNIC 21403-9864533-3 on dated 25/3/2022 and subsequent letter received through Whatsapp vide Directorate of E&SE Khyber Pakhtunkhwa Peshawar No 3398-3401 dated 25/3/2022 on 30/3/2022, the instant inquiry was conducted to prepare a fact finding report about the promotion case from TT to STT as Mr Faris Khan TT was left from promotion in the DPC held on 1/9/2022 and also to fix responsibility upon the officer/official who did not updated the seniority list of TT by not excluded the terminated Ex-TT Mr Rooh Ullah who was removed from service.

**Annexure---1 & 2**

**STATEMENTS:** The statements of the main officer and official were recorded as under:


**Statement of Muhammad Ali, ADEO Establishment:** He stated that he handed over the "Removal From Service order" of Rooh Ullah Ex-TT to Waheed Ullah the then dealing clerk on 21/9/2021. He further said that beside this, he was neglected in the whole process of promotion and he did not know about the process. **Annexure---3**

**Statement of Waheed Ullah the then D/clerk:** He said that DPC for the promotion of TT to STT was held on 1/9/2021 and he received the termination order of Rooh Ullah Ex-TT on 21/09/2021 so how could he exclude the name of Rooh Ullah from the working papers. He further said that 8 posts were vacant for STT promotion at that time and Faris TT was placed at 9<sup>th</sup> in the working papers so it was the responsibility of the Directorate to consider his case. **Annexure---4**

**FINDINGS:**

1. Mr. Faris Khan was appointed as TT on 16/01/2016.
2. Total No of posts for the promotion from TT to STT at that time were 8 and according to the dealing clerk, Mr faris was placed at 9<sup>th</sup> in the working papers as reserve.
3. A list of 15 deferred officials in different cadres including Faris Khan TT from the o/o the DEO Mohmand was forwarded to the Directorate of E&SE with clear remarks of termination of Rooh Ullah Ex-TT vide DEO(M) mohmand No 21 dated 4/01/2022 but in vain. **Annexure---5**
4. ADEO Establishment is the incharge of his branch and he should circulate the Removal from service order of Rooh Ullah Ex-TT to all branches for necessary action in time which he did not. So Rooh Ullah Ex-STT was not excluded from the seniority list and working paper due to lethargic and irresponsible attitude of Muhammad Ali ADEO Establishment. He handed over the said termination order to Waheed Ullah the then dealing clerk of promotion cases on 21/01/2021 after 20 days of the DPC and about one year, 8 months and 19 days of the issuance of the termination order of Rooh Ullah Ex-TT.

**RECOMMENDATION:** The report to the Directorate of E&SE KP Peshawar may be sent with the request for the promotion of Mr. Faris Khan to STT please.

  
Inquiry Officer  
Sher Ali Principal GPS Lakarai Mohmand

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5/11/2012

Please forward to OLC  
Mohammad for clarity  
report on the  
issue as above  
by Country Rep

8/3/2012

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