
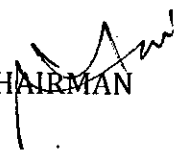


Form-A
FORM OF ORDERSHEET

Court of _____

Case No. 510/2018

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge |
|-------|---------------------------|--|
| 1 | 2 | 3 |
| 1 | 11/04/2018 | <p>The appeal of Mr. Abdul Rashid presented today by Mr. Shamsul Hadi Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 11/4/18</p> |
| 2- | 17-5-2018 | <p>This case is entrusted to Touring S. Bench at Swat for preliminary hearing to be put up there on <u>06-07-2018</u></p> <p style="text-align: right;"> CHAIRMAN</p> |

06.07.2018

Counsel for the appellant Mr. Shamsul Hadi, Advocate present and heard on preliminarily.

Contends that according to the seniority and 75/% promotion quota, the appellant was entitled to promotion to the post of SST, fixed for the staff members, but he was ignored.

Points raised need consideration. The appeal is admitted for regular hearing, subject to all legal objections, if raised by the respondents. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 08.08.2018 before S.B at camp court, Swat. Notice of stay application should also be given to the respondents for the date fixed.

Appellant Deposited
Security & Process Fee

08.08.2018

Clerk to counsel for the appellant present. Due to summer vacations, the case is adjourned. To come up for the same on 06.09.2018 at camp court Swat

Chairman

Camp court, Swat

Reader

06.09.2018

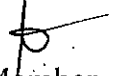
Counsel for the appellant present. Mr. Abaid ur Rehman, ADO alongwith Mr. Usman Ghani, District Attorney for respondents present. Written reply not submitted. Requested for adjournment. Granted. Case to come up for written reply/comments on 04.10.2018 before S.B at camp court Swat.

Member

Camp Court Swat

04.10.2018

Clerk of counsel for the appellant present. Mr. Usman Ghani, District Attorney for respondents present. Written reply not submitted. Learned District Attorney sought some time to submit the same. Case to come up for written reply/comments on 07.11.2018 before S.B at camp court Swat.


Member
Camp Court Swat

07.11.2018

Due to retirement of the Hon'ble Chairman Service Tribunal is incomplete. Tour to Camp Court Swat has been cancelled. To come up for the same on 06.12.2018 at camp court Swat.


Reader

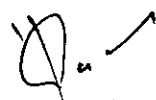
06.12.2018

None present on behalf of appellant. Mr. Usman Ghani learned District Attorney present. Written reply not submitted. No one present on behalf of respondent department. Adjourn. To come up for written reply/comments on tomorrow i.e. on 07.12.2018 before S.B at Camp Court Swat.


Member


07.12.2018

Clerk to counsel for the appellant present. Respondents absent. Mr. Ubaid ur Rehman ADO representative of respondent No.1 also absent. Notices be issued to the respondents with the direction to file written reply/comments on 09.01.2019. Adjourn. To come up for written reply/comments on the date fixed before S.B at Camp Court Swat.


Member
Camp Court, Swat.

09.01.2019

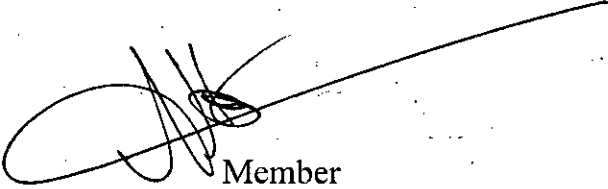
Clerk of counsel for the appellant present. Mr. Obaid-ur-Rehman, ADO alongwith Mr. Mian Ameer Qadir, District Attorney for the respondents present. Written reply on behalf of respondents not submitted. Learned District Attorney requested for further adjournment. Adjourned. Case to come up for written reply/comments on 06.03.2019 before S.B at Camp Court Swat.


(Muhammad Amin Khan Kundi)
Member
Camp Court Swat

06.03.2019

Counsel for the appellant present. Mian Amir Qadir, District Attorney for respondents present. Counsel for the appellant submitted an application for withdrawal of the instant appeal. As such application is allowed and the instant appeal is hereby withdrawn. File be consigned to the record room.

Announced:
06.03.2019


Member
Camp Court, Swat

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR.**

Service Appeal No. 510 /2018.

Abdul Rashad.....Appellant

V E R S U S

District Education Officer (M) and others.....Respondents

INDEX

| S.N | Description of Documents | Annex | Pages |
|-----|---|-------|-------|
| 1. | Memo of Appeal along with Affidavit. | | 1---5 |
| 2. | Stay Application and affidavit. | | 6-7 |
| 3. | Addresses of Parties. | | 8 |
| 4. | Copies of Promotion order and certificates | A | 9-19 |
| 5. | Copies of Rules, list of vacant posts and advertisement, application. | B. | 20-30 |
| 6. | Copies of Writ petition and judgment. | C | 31-35 |
| 6. | Copy of representation. | D | 36 |
| 7. | Copies of promotion of others. | E | 37-42 |
| 7. | Wakalat Nama | | 43 |

Appellant

Through

Shams ul Hadi
Advocate.

Office: H/No.6 near al-Falah Mosque

Hayat Abad, Mingora.

Cell No.0347-4773440.

1

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR.**

Service Appeal No. S10 /2018.

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 536

Abdul Rashad (C.T)

Dated 11-4-2018

Presently posted at GHSSS Khanano Dheri, Bunir.....Appellant.

V E R S U S

1. District Education Officer(M), Bunir.
2. Director, Elementary & Secondary Education Pakhtunkhwa,
Peshawar.
3. Secretary Education, Khyber Pakhtunkhwa, Peshawar.

.....Respondents

**APPEAL UNDER SECTION 4 OF KHYBER
PUKHTUNKHWA SERVICES TRIBUNAL ACT
1974 AGAINST NON- IMPLEMENTATION OF
POLICY/NOTIFICATION NO.SO(PE) 4-
5/SSRC/MEETING/2013/TEACHINGCADRE
DATED;24.07.2018 AGAINST WHICH THE
APPELLANT FILED DEPARTMENTAL
APPEAL WHICH WAS NOT DECIDED WITHIN
STATUTORY PERIOD.**

Filed to-day
Registrar
11/4/18

PRAYER IN APPEAL:

On acceptance of this appeal the POLICY/NOTIFICATION NO.SO(PE)4-5/SSRC/MEETING/2013/TEACHING CADRE DATED;24.07.2018 of para 1.B may kindly be implemented letter and spirit and the appellant may kindly be promoted to the post of SST- BPS-16 according to his seniority.

Respectfully Sheweth:

1. That initially, the Appellant was appointed as Primary School teacher (PST) and latter on in the year 2012 he was promoted to the posts of Certified Teacher (C.T).(Copies of Promotion order and certificates are annexure-A)
2. That according to the rules and seniority, the Appellant deserve for promotion to next higher rank i-e "Secondary School Teacher" (S.S.T BPS-16) and as such the appellant is entitle for promotion to the posts of SST according to 75% promotion quota but the respondents without caring for the rules and policy advertised the vacant posts and wants to fill the subject vacant posts through fresh appointments by ignoring the 75% promotion quota reserved for the Appellant and such like others. "it is pertinent to mention here that the appellant approached the concerned authority for obtaining seniority list but the same was not provided" (Copies of Rules, list of vacant posts and advertisement are annexure-B)
3. That against the illegal actions and inactions, the appellant approached the august Peshawar High Court through Writ Petition No.870-m/2017 where the same was treated as Departmental appeal and was referred for further consideration to the department/respondents through judgment dated:13.12.2017.(Copy of Writ petition and judgment are annexure-C)
4. That time and again the Appellant made so many request to concerned officials and for implementation of promotion policy but till date no heed was paid to his requests nor the said departmental appeal was decided within statutory period..(copy of representation is annexure-D)

That being aggrieved the Appellant prefers this appeal on the following grounds amongst others inter-alia.

GROUND:

- A. That the actions and inactions of the respondents are against the law and policy laid down for the purpose because the Appellant is entitle for promotion according to 75% promotion quota and as such filling all the vacant posts of SST through fresh/initial appointment is against the law and rules.
- B. That the appellant got the eligibility for the posts of SST-BPS-16 in September 2017 where there after all the subject were posts were advertised on 20.11.2017 so the respondents are bound to first to arrange DPC for the appellant and such like according to the policy and then should have to fill the same rest of the posts through fresh appointment.
- C. That the other posts of C.T were filled through promotion on December 2017 where meeting of Departmental Promotion Committee was arrange for others, leaving the case of the appellant and others which clearly showing the ill intention of the respondents and also the same act is clear example of discrimination. (Copies of promotion orders are annexure-E)
- D. That the appellant wants through instant appeal implementation of the relevant policy hence this august tribunal has the jurisdiction to entertain the instant appeal.
- E. That the appellant was not treated in accordance with law and rules, thus acted in violation of the relevant laws laid down for the purpose .

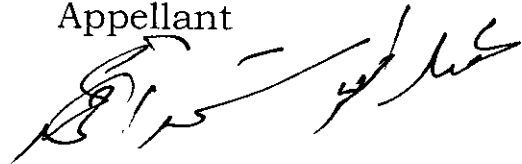
It is, therefore, humbly prayed that on acceptance of this appeal;

- i) Directions may kindly be issued to respondents, to implement the relevant rules for promotion to the post of "SST" letter in spirit.
- ii) The respondents may kindly be direct, to consider the Appellant for promotion to next higher rank i-e "Secondary School Teacher" (SST) according to 75% promotion quota in the vacant posts.
- iii) And further they may graciously be direct, to arrange a meeting of "Departmental Promotion Committee" for further promotion to the posts of (SST) BPS-16 before filling the advertised posts through initial appointments.

Or

Any other relief which this august Court deems appropriate may kindly be awarded to meet the ends of justice.

Appellant



Abdul Rashad

Through



Shams ul Hadi

Dated: 03/04/2018. Advocate, Peshawar.

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR.**

Service Appeal No. _____/2018.

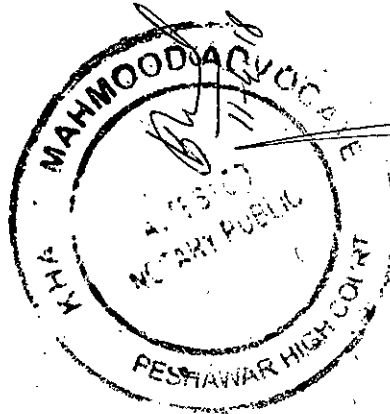
Abdul RashadAppellant

V E R S U S

District Education Officer (M) and others.....Respondents

AFFIDAVIT

I, **Shams ul Hadi**, Advocate, Peshawar do hereby as per information conveyed to me by my client solemnly affirm and declare 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 Court.



ADVOCATE

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR.**

Service Appeal No. _____/2018.

Abdul RashadAppellant

V E R S U S

District Education Officer (M) and others.....Respondents

Application for status-quo to the extent that the advertised posts shall not be filled through fresh appointment till final disposal of the titled appeal .

Respectfully Sheweth:

1. That the appellant/petitioner filed instant application along with service appeal in which no date is fixed so for.
2. That facts and grounds of the appeal may kindly be considered part and parcel of this application.
3. That prima facie the appellant has good case and is sanguine about its success because the respondents violated the rules & policy.
4. That if the advertised posts of SST-BPS-16 will filled through fresh appointment then it will badly prejudice the case of the appellant and will also affect legitimate expectancy of promotion to next higher rank i-e SST BPS-16 of appellant and a such the appellant will suffer irreparable loss.

So on acceptance of this application, operation /selection process of advertisement dated:20.11.2017 may kindly be suspended and the respondents may kindly be direct, not to issue appointment order on the subject posts of SST-BPS-16 till final decision of the titled appeal.

Through

Applicant 

Shams-ul- Hadi
Advocate High Court.

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR.**

Service Appeal No. _____/2018.

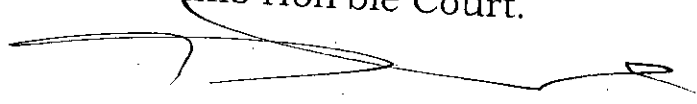
Abdul RashadAppellant

V E R S U S

District Education Officer (M) and others.....Respondents

AFFIDAVIT

I, **Shams ul Hadi**, Advocate, Peshawar do hereby as per information conveyed to me by my client solemnly affirm and declare that the contents of the **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.


DEPONENT

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR.**

Service Appeal No. _____/2018.

Abdul RashadAppellant

V E R S U S

District Education Officer (M) and others.....Respondents

ADDRESSES OF THE PARTIES

APPELLANT:

Abdul Rashad C.T

Presently posted at GHS Khanano Dheri Bunir

Cell No.

RESPONDENTS:

1. District Education Officer(M) Bunir.
2. Director, Elementary & Secondary Education Pakhtunkhwa,
Peshawar.
3. Secretary Education, Khyber Pakhtunkhwa, Peshawar.

Appellant

Through

Shams ul Hadi

Advocate, Peshawar.

Dated: 04/04/2018

NOTIFICATION

Consequent upon the recommendation of the departmental selection committee (DSC) held on 05/09/2012, as contained in the minutes of the meeting issued vide this office No.11-11-65 dated 05/09/2012.

As approved by the competent authority the Executive District Officer Elementary & Secondary Education Buner is pleased to order the appointment of the following C.T. teachers against the vacant posts in schools mentioned against their names in OPS- 15 (3500-700-6350) plus usual allowances as admissible to them under the rules with effect from the date of taking over charge subject to the terms and condition given at the end in the interest of public service.

C.T. (Male)Deceased Candidate.

| S.No | Name | Father Name | Residence | D.O.B | School Where Posted |
|------|-------------|---------------|---------------|------------|---------------------|
| 1 | IJAZ UL HAQ | AZIZ UL HAKIM | TEHSIL DAGGAR | 20/03/1991 | GHS GHAZI KHANA |

Open Merit Candidates:

| S.No | Name | Father Name | Residence | D.O.B | School Where Posted |
|------|-----------------|-------------------|-------------|------------|----------------------|
| ① | ABDUR RAHMAN | SHAH TAMRAIZ | TANGORA | 05/06/1985 | GMS DAB |
| 2 | BAKHT RASHAD | ROOM SAID | CHANAR | 02/03/1986 | GHS KATKALA |
| 3 | RIAZ ALI | AMIR AHMAD SHAH | GHARORAI | 03/04/1980 | GHS KHARORAI |
| ④ | ABDUR RASHAD | MUNTAZIR SHAH | KAR DEHRAI | 05/06/1984 | GHS GHURGUSHITC |
| ⑤ | ASAD ALI KHAN | TAJ MOHAMMAD KHAN | SHALBANDAI | 17/12/1985 | GMS SHER ALI |
| 6 | SAJJAD ALI | SULTAN | REGA | 01/04/1988 | GHSS BATARA |
| 7 | SALIM UR RAHMAN | HIMAYAT UR RAHMAN | ELAI | 25/07/1981 | GHS GADEZI |
| 8 | BACHA JAN | GHULAM JAN | JCWAR | 12/04/1981 | GHS KATKALA |
| ⑨ | MOMIN KHAN | MIR AHMAD KHAN | AMNAWAR | 11/12/1985 | GMS CHALAN TRAI |
| 10 | SARFARAZ KHAN | AWAL DAD | BAZARGAI | 04/10/1981 | GHS BAZARGAI |
| ⑪ | MUHTARAM SHAH | RAZIQ SHAH | KALPANI | 17/02/1981 | GHSS BATARA |
| 12 | MOHAMMAD AYAZ | MOHAMMAD RAZIQ | KARAPA | 20/04/1989 | GMS ASHEZO NAWAKALAY |
| 13 | SARDAR HUSSAIN | SHER HASSAN | TOTALAI | 09/01/1975 | GMS DANDAR |
| ⑫ | AYAZ AHMAD | YOUSAF ZAI | DEWANA BABA | 01/01/1987 | GHS GULBANDI |

Terms and Conditions:-

- Their services will be considered regular but without Pension & Gratuity in terms of Section -19 of the NWFP Civil Servant Act, 1973.

C.T.-C

OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY & SECONDARY EDU: BUNER

NOTIFICATION

Consequent upon the recommendation of the departmental selection Committee (DSC) held on 05/09/2012, as contained in the minutes of the meeting issued vide his office No.11___65 dated 05/09/2012.

As approved by the competent authority the executive District Officer Elementary & Secondary Education Buner is pleased to order the appointment of the following C.T teachers against the vacant posts in schools mentioned against their names in BPS-15 (8500-700-6350) plus usual allowance as admissible to them under the rules with effect from the date of taking over charge subject to the terms and condition given at the end in the interest of public service.

C.T (Male)

| S.No | Name | Father Name | Residence | D.O.B | School Where posted |
|------|-------------|---------------|---------------|------------|---------------------|
| 1 | Ijza Ul Haq | Aziz Ul Hakim | Tehsil Daggar | 20/03/1991 | GHS Ghazikhana |

Open merit candidate

| S.No | Name | Father Name | Residence | D.O.B | School Where posted |
|------|-----------------|-------------------|------------|------------|----------------------|
| 1. | ABDUR RAHMAN | SHAH TAMRAZ | TANGORA | 05/06/1985 | GMS DAB |
| 2. | BAKHT RASHAD | ROOM SAID | CHANAR | 02/03/1986 | GHS KATKLA |
| 3. | RIAZ ALI | AMIR AHMAD SHAH | CHARORAI | 03/04/1980 | GHS KHARARAI |
| 4. | ABDUR RASHAD | MUNTAZIR SHAH | KAR DHERAI | 05/06/1984 | GHS GHURA |
| 5. | ASAD ALI KHAN | TAJ MOHAMMAD KHAN | SHALBANDAI | 17/12/1985 | GMS SHER AL |
| 6. | SAJJAD ALI | SULTAN | REGA | 01/04/1988 | GHSS BATARA |
| 7. | SALIM RAHMAN UR | HIMAYAT RAHMAN UR | ELAI | 25/07/1981 | GHSS GADEZI |
| 8. | BACHA JAN | GHULAM JAN | JOWAR | 12/04/1981 | GHS KATKALA |
| 9. | MOMIN KHAN | MIR AHMAD KHAN | AMNAWAR | 11/12/1985 | GMS CHALANRAI |
| 10. | SARFARAZ KHAN | AWAL DAD | BAZARGAI | 04/10/1981 | GHS BAMPOKHA |
| 11. | MUHTARAM SHAH | RAZIQA SHAH | KALPANI | 17/02/1981 | GHSS BATARA |
| 12. | MOHAMMAD AYAZ | MOHAMMAD RAZIQ | KARAPA | 20/04/1989 | GMS ASHEZO NAWAKALAY |
| 13. | SARDAR HUSSAIN | SHER HASSAN | TOTALAI | 09/01/1975 | GMS DANDAR |
| 14. | AYAZ AHMAD | YOUSAF ZAI | DEWANABABA | 01/01/1987 | GHS GUL BANDAI |

Terms and condition

1. Their service will be considered regular but without Pension & Gratuity in terms of section -19 of the NWFP Civil Servant Act 1973

- to be granted as allowed to them under their previous terms of appointment or to avail the benefit of Contributory Provident Fund allowed to them under new appointment.
3. Their services are liable to termination on one month's notice from either side. In case of resignation without notice their one month pay/allowances shall be forfeited to the Government.
 4. They should join their post within 15 days of the issuance of this notification. In case of failure to join their post within 15 days of the issuance of this notification, their appointment will expire automatically and no subsequent appeal etc. shall be entertained.
 5. They would be on probation for a period of one year extendable for another one year.
 6. They are required to produce health and age certificate from the concerned Medical Superintendent before taking over charge.
 7. They are not allowed to take over charge, if their age is less than 18 years and more than 55 years.
 8. The Principals / Head Masters / Head mistress concerned may not hand over the charge to the appointee, if there is no vacant post in the school.
 9. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
 10. 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.
 11. They are directed to furnish copies of all sort of certificates/degree/diplomas etc along with their original receipt and photocopies of testimonials pertaining to the verification fee of concerned examination bodies (Board/universities etc) to the Executive District Officer Elementary & Secondary Education Buner. If any certificate/ degree / domicile etc of any candidate found fake or bogus in verification process so he will be terminated with out further notice.
 12. The appointing authority shall arrange verification of all the certificates / degrees (Academic / Professional) etc of the appointee and will issue the clearance certificate of each appointee to D.A.O Buner for the release of pay, further more the Drawing and Disbursing Officer will not draw their salaries till the completion of verification process.
 13. The Principals/Head Masters concerned would furnish a certificate to the effect that the candidate has joined the post or otherwise after 15 days of the issuance of his posting orders.
 14. Charge report should be submitted to all concerned.
 15. No TA/ DA will be allowed to the appointee for joining their duty.

10

(RAJ MUHAMMAD KHAN)
EXECUTIVE DISTRICT OFFICER
ELEMENTARY & SECY; EDU; BUNER.

Dated 19/7/2012..

[Signature]

Enclst; No. 19/117-19

Copy to the:-

1. Director (E&SE) Khyber Pakhtunkhwa Peshawar
2. District Coordination Officer Buner
3. District Accounts Officer Buner
4. All Concerned.

[Signature]

10/3/10 Better copy 1

& gratuity as allowed to them under their previous terms of appointment or to _____ the benefit of contributory Provident Fund allowed to them under new appointment.

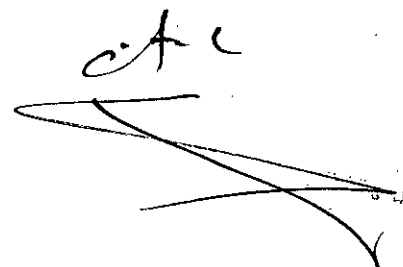
2. Their service are liable to termination on one month's notice from either side in case of designation without notice their one month pay /allowance shall be forfeited to the Government.
3. They should join their post within 15 days of the issuance of this notification. In case of failure to join their post within 15 days of the issuance of this notification, their appointment will expire automatically and no subsequent appeal etc shall be entertained.
4. They would be on probation for a period of one year extendable for another one year
5. They are required to produce health and age certificate from the concerned Medical Superintendent before taking over charge.
6. They are not allowed to take over charge if their age is less than 35 years .
7. The Principals/ headmasters/ Head Mistress concerned may not be hand over the charge to the appointee, if there is no vacant post in the school.
8. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
9. Their services can be terminated at any time, in case their performance s found unsatisfactory during protionary period. In case of misconduct they shall be preceded under the rules framed from time to time.
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12. The Principals/ headmasters concerned would furnish a certificate to the effect that then candidate has joined the post pr otherwise after 15 days of he issuance of his posting orders.
13. Charge report should be submitted to all concerned
14. No TA/DA will be allowed to the appointee for joining their duty.

(RAJ Muhammad Khan)
EXECUTIVE DISTRICT OFFICER
ELEMENTARY SECY:EDU; BUNER

Endst No. 12/17.19 dated

dated 19/09/2012

1. Director (E & SE) Khyber Pakhtunkhwa Peshawar.
2. District Coordination Officer Buner
3. District Accounts Officer Buner
4. All Concerned

etc


ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD

PROVISIONAL RESULT CARD



Serial No. 270608

Name ABDUR RASHAD
 Fathers's Name MUHTAZIR SHAH
 Address VILL DATTKAR DERAI P/O NAWAGAI
 CHAMLA
 Tehsil BUNIR
 District BUNIR
 has successfully completed BACHELOR OF EDUCATION(B. ED)

Roll No. 608189534
 Registration No. 06NER0264
 Final Semester SPR-2009

11

The detail of passed courses are as under:

| Semester | Course Code | Title of Course | Marks | |
|----------|-------------|-------------------------------------|---------|----------|
| | | | Maximum | Obtained |
| SPR- 08 | 0651 | ENGLISH | 100 | 58 |
| SPR- 08 | 0518 | EDUCATIONAL PSYCHOLOGY & CURRICULUM | 100 | 60 |
| SPR- 08 | 0514 | EVALUATION, GUIDANCE & RESEARCH | 100 | 55 |
| SPR- 08 | 0513 | SCHOOL ORGANIZATION | 100 | 67 |
| SPR- 09 | 0652 | ISLAM, PAKISTAN AND MODERN WORLD | 100 | 71 |
| SPR- 09 | 0512 | PERSPECTIVES OF EDUCATION | 100 | 65 |
| SPR- 09 | 0653 | TEACHING OF CHEMISTRY | 100 | 63 |
| SPR- 09 | 0655 | WORKSHOP & TEACHING PRACTICE | 100 | 83 |
| SPR- 09 | 0520 | TEACHING OF BIOLOGY | 100 | 52 |

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CREDITS: 5

Total Marks / Obtained

900 / 579

Result Declared on FEBRUARY 10, 2010

Percentage / Grade

64 B

Date of issue FEBRUARY 20, 2010

Handwritten signature
 Controller of Examinations

Disclaimer:

This result card is issued provisionally, error and omission excepted, as a notice only. Any entry appearing in this card dose not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.

Handwritten signature



UNIVERSITY OF MALAKAND PAKISTAN

Serial No. BSC/0685

This Degree of *Bachelor of Science* Is Awarded to

12
Name ABDUR RASHAD

Son/Twin/Minor of MUNTAZIR SHAH

Student/Parent/Institution of

GOVT. DEGREE COLLEGE DAGGAR BUNER

Having passed the prescribed examination held in JUNE-JULY, 2007

Session 2004-2006 Registration No. 2004S50019 Roll No. 19753

Division SECOND

Examination has taken place in parts

Assurance Date DECEMBER 30, 2008

Countersigned

Controller of Examinations

Registrar

Vice Chancellor

Serial No. 000259

Reg. No. 09-AWKUM-M-Chem-225

Roll No. 15

Abdul Wali Khan University

Mardan, Pakistan



The University in recognition of the fulfilment of prescribed requirements has conferred upon

Mr. / Ms. ABDUR RASHAD Son / Daughter of MUNTAZIR SHAH

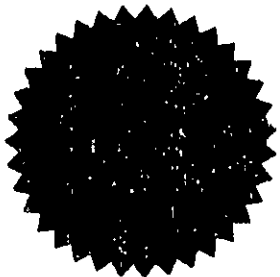
The Degree of


MASTER OF SCIENCE IN CHEMISTRY

in the examination held in Feb-2011 session Spring 2009-10

He / She was placed in 3.24 Division / Grade / CGPA

The examination was taken as a whole / ~~in Parts~~.




Controller of Examinations

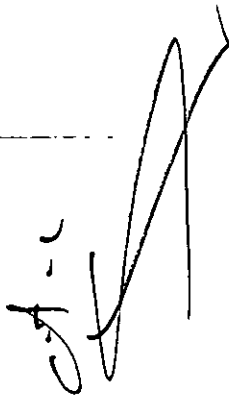

Registrar


Vice Chancellor

Result Declaration Date. 28-06-2011

13





To,

The District Education Officer (M)

(30)

Subject: Request for Bunes
the provision of C.T Seniority list.

Sir,

Most humbly I beg to say that I need a Seniority list to confirm my Seniority number for promotion to S.S.T (Bio-Chemistry).

Therefore you are requested to issue order to provide me the list mentioned in the subject mentioned above.

I shall be very thankful to you for the

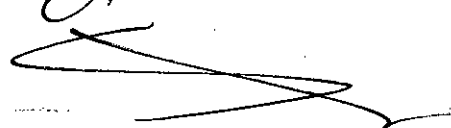
Yours obediently

¹⁶
Abdur Rashid C.T

GHS Ichamano Dairai

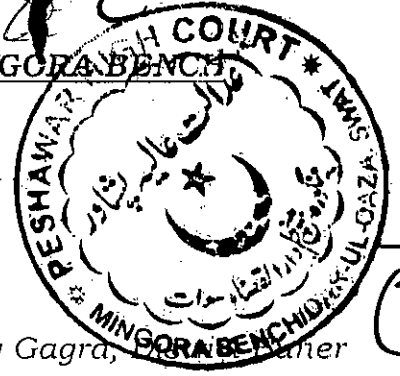
Bunes.

Date: 03-04-2018.

C.T.


~~Amnawar~~
BEFORE THE PESHAWAR HIGH COURT, MINGORA BENCH

W.P No. 870 -M/2017.



1. **Momin Khan S/O Mir Ahmad Khan C.T**
Resident of Village Amnawar, Moh: Dispensary Gagra,
Presently Posted at GHSS Amnawar
2. **Mukhtaram Shah S/O Raziq Shah C.T**
Resident of village Kalpani, Moh: Baro, Daggar District Buner
Presently Posted at GHS Swari Bunir
3. **Asad Ali Khan S/O Taj Muhammad Khan C.T**
Resident of Shalbandi Moh: Bakhshah Gagra, District Buner
Presently Posted at GMS Mania Bunir
4. **Ayaz Ahmad S/O Yousaf Zai C.T**
Resident of Village Dewan Baba, Moh: Mani Pur Daggar, District
Buner
Presently Posted at GHS Kulyarai Bunir
5. **Abdul Rashad S/O Muhtazir Shah C.T**
Resident of Village Dattkar, Derai, Chamla, District Buner
Presently Posted at GHSS Khanano Dheri District Bunir
6. **Abdur Rehman S/O Shah Tamraiz C.T**
Resident of Tangora, Daggar District Buner
Presently Posted at GHS Tangora Bunir..... (Petitioners)

VERSUS

1. District Education Officer(Male) Eunir
2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa,
Peshawar.
3. Government of Khyber Pakhtunkhwa through Chief Secretary Civil
Secretariat Peshawar..... (Respondents)

WRIT PETITION UNDER ARTICLE 199 OF THE CONSTITUTION
OF ISLAMIC REPUBLIC OF PAKISTAN, 1973

Respectfully Sheweth:

Brief facts rise to the instant Writ Petition are as under:

FACTS:

1. That initially, the petitioner were appointed as Primary School
Teacher (PST) and latter on in the year 2012 they were promoted to
the posts of Certified Teacher (C.T) . (Copy of Promotion order and
certificate are annexure -A)

Re-Filed Today

08 DEC 2017

Additional Registrar



UNIVERSITY OF MALAKAND

30365

PAKISTAN

S.No. _____

DETAILED MARKS CERTIFICATE

14

Name: ABDUR RAHMAN

Father's Name: SHAH TAMRAIZ

Registration No. 2006550043

G.D.C Daggar Buner



Roll No. 22520

B.Sc PART-II ANNUAL EXAMINATION, 2008

| Subject Name | Total Marks | Marks Obtained | Remarks |
|--------------|-------------|----------------|---------|
| BOTANY | 75 | 44 | PASSED |
| CHEMISTRY | 75 | 53 | PASSED |
| ZOOLOGY | 75 | 56 | PASSED |
| PAK. STUDY | 40 | 19 | PASSED |
| B.Sc PART-I | 285 | 146 | PASSED |
| | 550 | 318 | |

Subject Passing Percentage: 33 (Theory & Practical Separately). Aggregate Percentage: 36

Examination Held in Jun 23—Jul 24, 2008

Result Declared on 18-Sep-2008



Errors and Omissions are subject to subsequent rectification
Examination was taken as a whole/in parts

Date of Issue: 18-Sep-2008

Prepared by: Anjad Shahzad

AH
PRINCIPAL
G.D.C Daggar
Distt: Buner

Jahangir
Controller of Examinations
University of Malakand

c.t.c

**KOHAT UNIVERSITY OF SCIENCE AND TECHNOLOGY
(PAKISTAN)**

15 (4)

Abdur Rahman

son of

Shah Tamraiz

and a student of the **Department of Chemistry**

having fulfilled the requirements has been duly admitted to

the degree of

Master of Science

in

Chemistry

AH
Dist. Bureau



C.T.C
[Signature]

KOHAT UNIVERSITY OF SCIENCE AND TECHNOLOGY (PAKISTAN)

16

TRANSCRIPT

Name: Abdur RahmanFather Name: Shah TaUniv. Reg. No: 2008-KUCHM-02Reg. No: CH 22009100Department: ChemistrySession: 2008-2010Program: Master of Science in Chemistry

| Course No. | Course Title | Crd-Hrs | Grade | Grd.Pts | GPA | Status |
|--------------------|--|---------|-------|---------|------|--------|
| SPRING-2009 | | | | | | |
| CHEM531 | Physical Chemistry | 3 | C | 6.00 | | |
| CHEM511 | Inorganic Chemistry | 3 | B | 9.00 | | |
| CS 501 | Introduction to Computing & FORTRAN | 3 | A | 11.01 | | |
| CHEM574 | Bio-Chemistry Lab-I | 1 | C+ | 2.33 | | |
| CHEM571 | Inorganic Lab-I | 1 | B+ | 3.33 | | |
| CHEM572 | Organic Lab-I | 1 | B | 3.00 | | |
| CHEM541 | Bio-Chemistry | 3 | C | 6.00 | | |
| CHEM573 | Physical Lab-I | 1 | C | 2.00 | | |
| CHEM521 | Organic Chemistry | 3 | B | 9.00 | | |
| | | 19 | | 51.51 | 2.72 | |
| FALL-2009 | | | | | | |
| ENG501 | English Comprehension | 3 | B+ | 9.99 | | |
| CHEM542 | Biochemistry | 3 | C | 6.00 | | |
| CHEM575 | Inorganic Lab-II | 1 | B+ | 3.33 | | |
| CHEM576 | Organic Lab-II | 1 | C | 2.00 | | |
| CHEM512 | Inorganic Chemistry | 3 | B+ | 9.99 | | |
| CHEM578 | Biochemistry Lab-II | 1 | C | 2.00 | | |
| CHEM577 | Physical Lab-II | 1 | C+ | 2.33 | | |
| CHEM522 | Organic Chemistry | 3 | B | 9.00 | | |
| CHEM532 | Physical Chemistry | 3 | B- | 8.01 | | |
| | | 19 | | 52.65 | 2.77 | |
| SPRING-2010 | | | | | | |
| CHEM461 | Environmental Chemistry | 3 | C+ | 6.99 | | |
| CHEM433 | Advance Chemical Kinetics | 4 | B+ | 13.32 | | |
| CHEM432 | Polymers / Surface Chemistry | 4 | B+ | 13.32 | | |
| CHEM431 | Statistical Mechanics / Statistical Thermodynamics | 4 | B+ | 13.32 | | |
| | | 15 | | 46.95 | 3.13 | |
| FALL-2010 | | | | | | |
| CHEM462 | Environmental Chemistry | 2 | B+ | 6.66 | | |
| CHEM471 | Environmental Practical | 2 | A | 8.00 | | |
| CHEM436 | Advance Spectroscopy (P-VI) | 4 | B+ | 13.32 | | |
| CHEM434 | Solution/Nuclear Chem. (P-IV) | 4 | B+ | 13.32 | | |
| CHEM481 | Research Project | 3 | A | 12.00 | | |
| CHEM435 | Quantum/Thermodynamics (P-V) | 4 | B | 12.00 | | |
| | | 19 | | 65.30 | 3.44 | |

Cumulative Result

| Cumulative | Crd. Hrs | Grd. Pts | GPA |
|------------|----------|----------|------|
| | 72.00 | 216.57 | 3.01 |

The Candidate obtained 3.01 Cumulative GPA on the Scale of 4.00.

Result Declared on: March 24, 2011

Note: Errors and omissions are subject to subsequent rectification.

Signature: *AH*
PRINCIPAL
 GHS, Kohat
 Dist: Buner



c.t.c

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD
PROVISIONAL RESULT CARD



Serial No. 103438

Name **ABDUR RAHMAN**
Father's Name **SHAH TAMRAIZ**
Address **VILL: TANGORA P/O BATARA .**

Roll No. **AG654782**
Registration No. **10NBRO0122**
Final Semester **AUT- 2010**

Tehsil **DAGGAR**
District **BUNIR**
has successfully completed

CERTIFICATE OF TEACHING

17


The detail of passed courses are as under:

| Semester | Course Code | Title of Course | Marks | |
|----------|-------------|--|---------|----------|
| | | | Maximum | Obtained |
| SPR- 10 | 0638 | TEACHING STRATEGIES & EVALUATION | 100 | 59 |
| SPR- 10 | 0633 | SCHDDL ORGANIZATION | 100 | 65 |
| SPR- 10 | 0632 | EDUCATIONAL PSYCHOLOGY | 100 | 69 |
| SPR- 10 | 0631 | DIMENSIONS IN EDUCATION | 100 | 67 |
| AUT- 10 | 0634 | ENGLISH AND ITS TEACHING | 100 | 56 |
| AUT- 10 | 0612 | PRACTICAL WORKSHOP & TEACHING PRACTICE | 100 | 93 |
| AUT- 10 | 0607 | SCIENCE AND ITS TEACHING | 100 | 58 |
| AUT- 10 | 0635 | ISLAMIAT AND ITS TEACHING | 100 | 67 |
| AUT- 10 | 0604 | URDU LANGUAGE AND ITS TEACHING | 100 | 63 |


PRINCIPAL
 GHS Tangora
 Distt: Bunar

CREDITS: 5
Result Declared on **AUGUST 06, 2011**

Total Marks / Obtained **900 / 597**
66 B
Percentage / Grade




ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD
PROVISIONAL RESULT CARD

Serial No. 597939

Name: ABDUR RAHMAN
Father's Name: SHAH TAMRAIZ
Address: VILL TANGORA P/O BATARA DAGGAR

Roll No. AR650335
Registration No. 07NBR0566
Final Semester SPR-2013

Tehsil: DAGGAR
District: BUNIR

BACHELOR OF EDUCATION (B. ED)

18

has successfully completed

The detail of passed courses is as under:

| Semester | Course Code | Title of Course | Marks | |
|----------|-------------|-------------------------------------|---------|----------|
| | | | Maximum | Obtained |
| AUT-12 | 0512 | PERSPECTIVES OF EDUCATION | 100 | |
| AUT-12 | 0513 | SCHOOL ORGANIZATION | 100 | |
| AUT-12 | 0514 | EVALUATION, GUIDANCE & RESEARCH | 100 | |
| AUT-12 | 0518 | EDUCATIONAL PSYCHOLOGY & CURRICULUM | 100 | |
| AUT-12 | 0651 | ENGLISH (COMPULSORY) | 100 | |
| AUT-12 | 0652 | ISLAM, PAKISTAN AND MODERN WORLD | 100 | |
| SPR-13 | 0520 | TEACHING OF BIOLOGY | 100 | |
| SPR-13 | 0653 | TEACHING OF CHEMISTRY | 100 | |
| SPR-13 | 0655 | WORKSHOP ON TEACHING PRACTICE | 100 | |

AT
PRINCIPAL
GHS Tangora
Dist: Bunir

CREDITS: 6

Total Marks / Obtained

900 / 69

Result Declared on: DECEMBER 26, 2013

Percentage / Grade

Date of issue: JANUARY 15, 2014

cf. e

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD



PROVISIONAL RESULT CARD

Serial No. 139443

Name: ABDUR RAHMAN
 Father's Name: SHAH TAMRAIZ
 Address: MOH KOZA HUJRA VILL TANGORA P/O BATARA
 DAGGAR
 Tehsil: DAGGAR
 District: BUNIR
 has successfully completed MASTER OF EDUCATION (M. ED)
 SCIENCE EDUCATION

Roll No. AY697883
 Registration No. G7NBRO566
 Final Semester SPR-2015

19

The detail of passed courses is as under:

| Semester | Course Code | Title of Course | Marks | |
|----------|-------------|--|---------|----------|
| | | | Maximum | Obtained |
| SPR- 14 | 0831 | FOUNDATIONS OF EDUCATION | 100 | 59 |
| SPR- 14 | 0837 | EDUCATIONAL RESEARCH | 100 | 71 |
| AUT- 14 | 0697 | ASSESSMENT IN SCIENCE EDUCATION | 100 | 62 |
| AUT- 14 | 0696 | TEACHING STRATEGIES IN SCIENCE EDUCATION | 100 | 56 |
| AUT- 14 | 0695 | FOUNDATIONS OF SCIENCE EDUCATION | 100 | 55 |
| AUT- 14 | 0698 | LABORATORY ORGANIZATION, MANAGEMENT & SAFETY METHODS | 100 | 71 |
| SPR- 15 | 6507 | EDUCATIONAL MEASUREMENT & EVALUATION | 100 | 68 |
| SPR- 15 | 6506 | EDUCATION IN PAKISTAN | 100 | 59 |
| SPR- 15 | 0846 | TEACHING STRATEGIES | 100 | 54 |
| SPR- 15 | 0840 | EDUCATIONAL PSYCHOLOGY | 100 | 68 |
| SPR- 15 | 0838 | CURRICULUM DEVELOPMENT & INSTRUCTIONS | 100 | 66 |
| SPR- 15 | 0855 | COMPUTER IN EDUCATION | 100 | 58 |

AH

PRINCIPAL
 GHS Tangora
 Distt: Buner

CREDIT HOURS: 36

Total Marks / Obtained

1200 / 747
 62 B

Result Declared on MARCH 08, 2016

Percentage / Grade

Date of issue: MARCH 18, 2016

Pran

C.F.C

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Peshawar, dated the 24th July, 2014.



NOTIFICATION

No.SO(PE)4-5/SSRC/Meeting/2013/Teaching Cadre: In pursuance of the provisions contained in rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the and Secondary Education Department in consultation with the Establishment Department and the Finance hereby directs that in this Department's Notifications No.SO(G)S&LD/1-28/2003/Vol-II dated, Notification No.SO(G)S&L/1-69/06/Vol-1/DPE/LIB dated, 13-11-2007, and Notification 4-5/SSRC/Meeting/2012/Teaching Cadre, dated, 13.11.2012, the following further amendments shall be made

AMENDMENTS

In the Appendix,-

(i) Serial No. 1 shall be renumbered as 1B and before Serial No. 1B, as so renumbered, the following new entries inserted in respective columns, namely:

| 1 | 2 | 3 | 4 | 5 |
|---|-----------------------------|---|----------------|---|
| 1 | Subject Specialist (BPS-17) | i. At least second class Master's Degree or four years BS Degree in the relevant subject; and ii. Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A Education or equivalent qualification from a recognized University. | 23 to 35 years | (a) Fifty per cent by promotion of seniority-cum-fitness, for subject from amongst the Sec Teachers (BPS-16), with at least service as such and having mentioned in column No. 3. Note: If no suitable candidate is relevant subject the post fall promotion quota shall be fill |

(1)

C.T.C

Amended
B
Shah Zaid
C.T.C
20

Director Physical Education (BPS-17)

At least second class Master's Degree in Physical Education from a recognized University.

22-35 years

(a) Fifty percent by promotion, on the basis of seniority-cum-fitness, from amongst Senior Physical Education Teachers (BPS-16) at least five years service as Senior Physical Education Teacher and Physical Education Teacher and having qualifications mentioned in column No. 3;

Provided that if no suitable candidate is available from amongst Senior Physical Education Teachers for promotion the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst the Physical Education Teachers with at least five years service as such having qualification mentioned in column No. 3;

Note:- If no suitable candidate is available in the relevant cadres of the above text, the post falling in their promotion shall be filled by initial recruitment;

(b) fifty percent by initial recruitment



12

C.A.C
[Signature]

(7) namely:

22

| 1 | 2 | 3 | 4 | 5 |
|-------|-----------------------------------|--|-----------------|--|
| ✓ 1B. | Secondary School Teacher (BPS-16) | <p>I. At least second class Bachelor Degree's from a recognized University on need basis from the following groups with two subject</p> <p>(a) (Chemistry, Botany or Zoology), Or (b) (Physics, Maths "A" or "B" or Statistics) Or (c) (Humanities and other equivalent groups at degree level with English as compulsory subject;</p> | 21 to 35 years. | <p>1. Seventy Five per cent. by promotion, basis of seniority-cum-fitness, from district concerned in the following manner</p> <p>(a) forty per cent from amongst the Certified Teachers (BPS-16), with five years service as Senior Teacher and Certified Teacher having qualification mentioned in column No.3:</p> <p>Provided that if no candidate is available from Senior Certified Teachers for 1 then the post shall be filled by 1 on the basis of seniority-cum-fitness from amongst Certified Teachers at least five years service as Senior Certified Teachers having qualification mentioned in column No. 3;</p> |
| | | <p>and</p> <p>II. Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A. Education or equivalent qualifications from a recognized University.</p> | | <p>(b) four per cent from amongst Drawing Masters (BPS-16), with five years service as Senior Masters and Drawing Masters having qualification mentioned in column No.3:</p> |



23

| | | | |
|--|--|--|--|
| | | | |
| | | | |
| | | | |
| | | | |

Provided that if no suitable candidate is available from among Senior Drawing Masters for promotion then the post shall be filled by promotion on the basis of seniority-cum-fit from amongst Drawing Masters with at least five years service as such having qualification mentioned in column No. 3;

(c) four per cent from amongst the Senior Arabic Teachers (BPS-16), with at least five years service as Senior Arabic Teachers and Arabic Teachers, having qualification mentioned in column No. 3:

Provided that if no suitable candidate is available from among Senior Arabic Teachers for promotion then the post shall be filled by promotion on the basis of seniority-cum-fitness, from Arabic Teachers with at least five years service as such having qualification mentioned in column No. 3;

(d) four per cent from amongst the Senior Theology Teachers (BPS-16), with at least five years service as Senior Theology Teachers and Theology Teachers, having qualification mentioned in column



24

Provided that if no candidate is available from Senior Theology Teachers for promotion then the post shall be filled by promotion on the basis of seniority-cum-fitness from amongst Theology Teachers having least five years service as such and having qualification mentioned in column No. 3;

(e) three per cent from amongst Qaris (BPS-16), with at least five years service as Senior Qari and having qualification mentioned in column No. 3:

Provided that if no candidate is available from amongst Senior Qaris then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from Qaris with at least five years service as such and having qualification mentioned in column No. 3;

(f) twenty per cent from amongst Primary School Head Teachers with at least seven years service as Primary School Head Teacher or Senior Primary School Teacher or Primary School Teachers and having qualification mentioned in column No. 3:

Provided that if no candidate is available from

[Handwritten signature]

25

Primary School Head
promotion then the post
promotion, on the basis
fitness, from amongst
School Teachers with at
service as Senior
Teachers and Primary
and having qualification
column No.3:

Provided further
candidate is available
Senior Primary Scho
promotion then the po
from amongst Primary
with at least seven yea
and having qualificati
column No.3; and

(ii) twenty Five per
recruitment.

Note:

I. If no suitable candid
the relevant cadre of t
the post falling in thei
shall be filled by initial

II. Posts of General SST
and SST-2 Science
promotion or initial re
need basis separately.

SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Endst : of even No. & date:

1. The Secretary to Government of Khyber Pakhtunkhwa, Establishment and Administration Department Peshawar
2. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department Peshawar.
3. The Secretary to Government of Khyber Pakhtunkhwa, Law Department Peshawar
4. The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.
5. The Accountant General Khyber Pakhtunkhwa Peshawar.
6. The Director, Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
7. The Director of Education (FATA) Peshawar.
8. The Director, Curriculum and Teacher Education Khyber Pakhtunkhwa Abbottabad.
9. The Director, (PITE) Khyber Pakhtunkhwa Peshawar.
10. The Director, ESRU Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
11. Manager Government Printing Press Khyber Pakhtunkhwa Peshawar.
12. The Deputy Director, EMIS (S&SE) Department Khyber Pakhtunkhwa Peshawar.
13. All District Education Officer (M&F) in Khyber Pakhtunkhwa.
14. All District Account Officer in Khyber Pakhtunkhwa.
15. All Agency Education Officer in FATA.
16. All Agency Account Officer in FATA.
17. PS to Governor Khyber Pakhtunkhwa. Peshawar.
18. PS to Chief Minister Khyber Pakhtunkhwa. Peshawar.
19. PS to Chief Secretary Khyber Pakhtunkhwa. Peshawar.
20. PS to Minister E&SE Khyber Pakhtunkhwa. Peshawar.
21. PS to Secretary E&SE Khyber Pakhtunkhwa. Peshawar.
22. Master file

(ZAMIN KHAN MOMAND)
SECTION OFFICER (PRIMARY)

(7)

26

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27

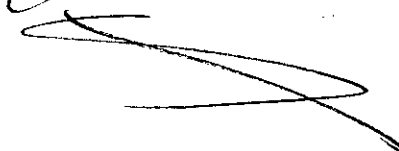


DISTRICT BUNER (Male)

District Cadre SST Posts 2017-2018

| S.No. | District Name | School Codes | Name of School. | SST-Sc: Bio/Chem: B-16 | SST-Sc: Math/Phy: B-16 | SST-Arts. B-16 | Total. |
|-------|---------------|--------------|---------------------|------------------------------|------------------------------|-------------------|--------|
| | | | | M | M | M | |
| 1. | Buner | 141601 | GHSS AMNAWAR | 1 | | 0 | 1 |
| 2. | Buner | 141602 | GHSS BATARA | | | 2 | 2 |
| 3. | Buner | 141603 | GHSS CHARORAI | | | 1 | 1 |
| 4. | Buner | 141604 | GHSS DAKARA | | 1 | 0 | 1 |
| 5. | Buner | 141605 | GHSS GADEZAI | 1 | | 0 | 1 |
| 6. | Buner | 141606 | GHSS GHAZI KOT | | 1 | 0 | 1 |
| 7. | Buner | 141607 | GHSS GHURGHUSHTO | | | 2 | 2 |
| 8. | Buner | 141608 | GHSS JANGAI | | | 2 | 2 |
| 9. | Buner | 141609 | GHSS KHANANO DHERAI | | | 2 | 2 |
| 10. | Buner | 141610 | GHSS KHARARAI | | 1 | 0 | 1 |
| 11. | Buner | 141611 | GHSS NOGRAM | | | 1 | 1 |
| 12. | Buner | 141612 | GHSS TOPAI | | | 2 | 2 |
| 13. | Buner | 141613 | GHS BAZARKOT | | 1 | 0 | 1 |
| 14. | Buner | 141614 | GHS CHANAR | 1 | | 0 | 1 |
| 15. | Buner | 141615 | GHS DAGAI | 1 | | 0 | 1 |
| 16. | Buner | 141616 | GHS GULBANDAI | 1 | 0 | 0 | 1 |
| 17. | Buner | 141617 | GHS GUMBAT | 1 | 1 | 1 | 3 |
| 18. | Buner | 141618 | GHS HISAR | 1 | 0 | 0 | 1 |
| 19. | Buner | 141619 | GHS KAWGA | | 1 | 0 | 1 |
| 20. | Buner | 141620 | GHS KARAPA | 1 | 0 | 0 | 1 |
| 21. | Buner | 141621 | GHS MANGAL THANA | 1 | 0 | 1 | 2 |
| 22. | Buner | 141622 | GHS NANSER | | 1 | 0 | 1 |
| 23. | Buner | 141623 | GHS PANDER | | 1 | 2 | 3 |
| 24. | Buner | 141624 | GHS TANGORA | | 0 | 2 | 2 |
| 25. | Buner | 141625 | GHS MIANA KADAL | 1 | 0 | 2 | 3 |
| 26. | Buner | 141626 | GHS CHANAL | 1 | 1 | 1 | 3 |
| 27. | Buner | 141627 | GHS JAMRA | 1 | 0 | 1 | 2 |
| 28. | Buner | 141628 | GHS LANGAW | 1 | 1 | 2 | 4 |

ct-c


ct-c


28



DISTRICT BUNER (Male)

District Cadre SST Posts 2017-2018

| S.No. | District Name | School Codes | Name of School. | SST-Sc: Bio/Chem: B-16 | SST-Sc: Math/Phy: B-16 | SST-Arts. B-16 | Total. |
|------------------------|---------------|--------------|--------------------|------------------------------|------------------------------|-------------------|-----------|
| | | | | M | M | M | |
| 29 | Buner | 141629 | GHS SHANGRA | 1 | 1 | 0 | 2 |
| 30 | Buner | 141630 | GHS JABA | 1 | 1 | 1 | 3 |
| 31 | Buner | 141631 | GHS KANGALAI | 1 | 1 | 2 | 4 |
| 32 | Buner | 141632 | GHS KALAN | 1 | 1 | 0 | 2 |
| 33 | Buner | 141633 | GHS KALIL | 1 | 1 | 1 | 3 |
| 34 | Buner | 141634 | GHS MALKA | 1 | 1 | 1 | 3 |
| 35 | Buner | 141635 | GHS JABA AMAZI | 1 | 1 | 1 | 3 |
| 36 | Buner | 141636 | GMS KASS CHARGHAZI | 0 | 0 | 1 | 1 |
| 37 | Buner | 141637 | GMS ALAMI BANDA | 0 | 0 | 1 | 1 |
| 38 | Buner | 141638 | GMS DAMNIR | 0 | 0 | 1 | 1 |
| 39 | Buner | 141639 | GMS KOZSHAMNAL | 0 | 0 | 1 | 1 |
| 40 | Buner | 141640 | GMS TARNIN | 0 | 0 | 1 | 1 |
| 41 | Buner | 141641 | GMS MANDOW | 0 | 0 | 1 | 1 |
| TOTAL VACANCIES | | | | 20 | 17 | 36 | 73 |

ct-c

ct-c

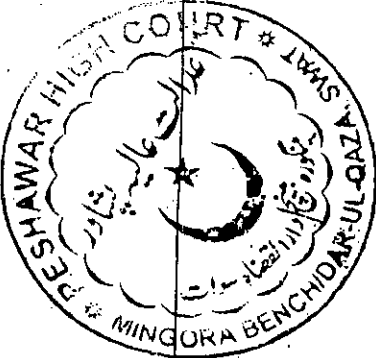
PESHAWAR HIGH COURT, MINGORA BENCH (DAR-UL-QAZA),
SWAT.

FORM "A"

FORM OF ORDER SHEET.

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32

| Serial No of order or proceeding | Date of Order or Proceeding | Order or other proceedings with Signature of judge or Magistrate and that of parties or counsel where necessary |
|----------------------------------|-----------------------------|--|
| 1 | 2 | 3 |
| | 13.12.2017. | <p><u>W.P.No.870-M/2017.</u></p> <p><u>Present:-</u> Mr.Shamsul Hadi, Advocate for the petitioner.</p> <p>=====</p> <p>MUHAMMAD NASIR MAHFOOZ, J.:- Through the present petition, the petitioner has made the following prayer;</p> <p><i>“that on acceptance of this writ petition:</i></p> <p>i. <i>Directions may kindly be issued to respondents to implement the relevant rules for promotion to the post of “SST” in letter and spirit.</i></p> <p>ii. <i>The respondents may kindly be directed to consider the petitioners for promotion to next higher rank i.e. “Secondary School Teacher” (SST) according to 75% promotion quota in the vacant posts.</i></p> <p>iii. <i>And further they may graciously be directed to arrange a meeting of “Departmental Promotion Committee” for further promotion to the posts of SST before filling the advertised posts through initial appointments”.</i></p> <p>2. Brief facts of the case as per the instant petition are that petitioner has been appointed as</p> |



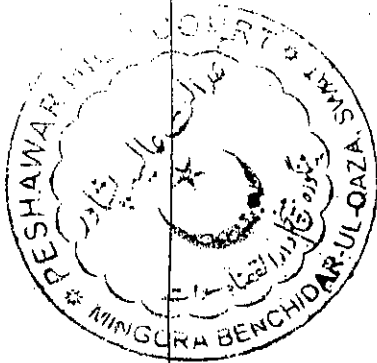
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Primary School Teacher (PST) in the year 2012 and were promoted to the posts of Certified Teacher (C.T). According to the rules and policy the petitioners deserve to be promoted as Secondary School Teachers (S.S.T) according to 75% promotion quota but without considering the petitioners for promotion, the respondents advertised the vacant posts. The petitioner made so many requests to the concerned officials for implementation of promotion policy but they have not been promoted. Hence, the present writ petition.

We have heard arguments of learned counsel for the petitioner and perused the record.

3. Petitioners are working as Certified Teacher (C.T) (BPS-15) since 19.09.2012 in the Education Department. Their grievance relates to seeking relief from this court for promotion to the post of SST that have been advertised vide notification dated 26.07.2014 to be filled up through initial recruitment the qualification required is mentioned in Column No.3. Amongst the basic qualifications one of the qualification for appointment is 40% by promotion from amongst

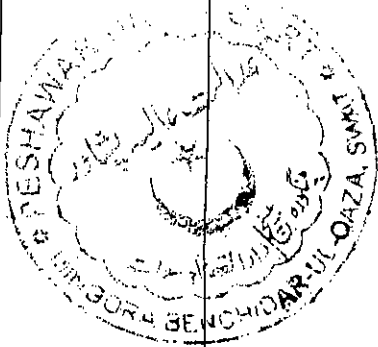


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the Senior Certified Teacher (BPS-16) with completion of almost five years service as Senior Certified Teachers and Certified Teachers etc. Learned counsel for the petitioners has referred the judgments reported as 1998 SCMR 208, 2004 PLC (C.S) 828, 2009 PLC (C.S) 40 and 2014 PLC (C.S) 773. The judgments cited at the bar are quite distinguishable on the ground that in those cases the officials respondents had considered the names of some junior employees and ignored the seniors while in case reported as 1998 SCMR 208 the employee was seeking proforma promotion after retirement while serving in a Provincial Assembly, who is not civil servant. In case 2004 PLC (C.S) 828 he was seeking re-employment after retirement and the petition was finally dismissed.

4. The instant writ petition neither contains the seniority list nor any other official has been impleaded as party in case his rights are effected. Since the petitioners are civil servants and the question of promotion relates to the terms and conditions of service and there is express bar under Article 212 of the Constitution of Islamic Republic





of Pakistan to entertain such like matters, which fall within the ambit of Services Tribunal. therefore, we would not like to discuss the question of eligibility of the petitioners but would only treat this writ petition as departmental appeal and refer the same to the respondents to be treated in accordance with law.

[Signature]
JUDGE

[Signature]
JUDGE

Announced:
Dt.13.12.2017.

Certified to be true copy

EXAMINER

Peshawar High Court, Mingora/Dar-ul-Qaza, Swat
Authorized Under Article 07 of Qanun-e-Mahadat Order 1988

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09/14/12

(A.R. KHAN)

HON'BLE MR. JUSTICE MUHAMMAD IBRAHIM KHAN & HON'BLE MR. JUSTICE MUHAMMAD NASIR MAHFOOZ.

36

Annex
D

To

The district education officer (M)
Buner

Subject: Request for promotion sst (Sc:) on the basis of policy in vogue
i.e. promotion as per quota for C.T / SCT 40 %.

Respected Sir,

With due respect it is stated that I am a C.T teacher and performing my duty in
Elementary and secondary education department since 19-09-2012. (order Attached)

My five years service is completed on 19 - 09-2017 therefore as per promotion
policy in vogue it is my due right to be promoted to SST Science (Bio, Chem) .

Our share for SST (Bio, Chem) and SST (Phy, Maths,) become 8 seats for each
category in the light of advertisement for SST through NTS Advertisement no. 6749 Date;
28/11/2017.

Therefore , it is requested to issue order for holding DPC for the subject
mentioned above..

I hope that justice will be done in this instant matter in the large interest of
public service please.

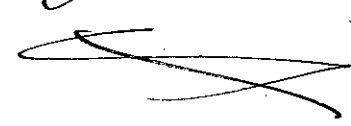
Yours Obediently,

Name of Teacher:

Abdur Rashad C.T GHSS Khanano Derai

Signature: Abdur Rashad

Dated: 2/12/2017

CTC


(37)

~~38~~

Answer

(K)

E



Khyber Pakhtunkhwa Peshawar

PH No: 091-9210389, 9210938,

9210437, 9210957, 9210468.

Fax 091-9210936, 0800-33857

E-mail rafiq_kk851@yahoo.com

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(PE)/4-5/SSRC/Meeting/2013/Teaching Cadre dated 24th July, 2014, the following SCTs/CTs, SDMs/DMs, SATs/ATs, STTs/TTs, Senior Qaris/Qaris, PSHTs/SPSTs/PSTs are hereby promoted to the post of SST (Bio-Chem), SST (Phy-Maths), SST (General) noted against each BPS-16 (Rs. 15880-1280-54280) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and further they will be posted by the District Education Officer concerned.

A. SST (General)

1. PROMOTION OF Sr; CT/CT TO SST (General) BPS-16.

| | |
|---|----|
| Total No. of SST General (M) Posts vacant Posts | 07 |
| 25% share initial recruitment | 02 |
| 75% share for Promotion. | 05 |
| 40 % Share of promotion of Sr; CT/CT | 03 |
| Posts available for promotion | 03 |
| Promoted through this order | 03 |

| S.No | S.L No | Name of Official & Present Place of Posting | Date of Birth | Date of Appott: as Regular CT | Qualificati on | Remarks |
|------|--------|---|---------------|-------------------------------|----------------|---|
| 1 | 45 | Saeed Ahmad GHS No4 Mingora | 2/5/1968 | 1/10/1989 | BA/B.Ed | Services placed at the disposal of DEO (M) Swat for further posting against SST (General) post. |
| 2 | 50 | Hamid Khan GHS Qandil | 1/2/1965 | 9/12/1989 | BA/B.Ed | -----do----- |
| 3 | 56 | Sahib Jan GHS Chuprial | 1/4/1966 | 10/11/1994 | BA/B.Ed | -----do----- |

2. PROMOTION OF PSHT/SPST/PST TO SST (General) BPS-16

| | |
|---|----|
| Total No. of SST General (M) Posts vacant Posts | 07 |
| 25% share initial recruitment | 02 |
| 75% share for Promotion. | 05 |
| 20 % Share of promotion of PSHT/SPST/PST | 02 |
| Posts available for promotion | 02 |
| Promoted through this order | 01 |

| S.No | S.L No | Name of Official & Present Place of Posting | Date of Birth | Date of Appott: as Regular PST | Qualificat ion | Remarks |
|------|--------|---|---------------|--------------------------------|----------------|---|
| 1 | 162 | Ibrahim GPS. Tahir Abad | 15/3/1965 | 24/1/1985 | BA/B.Ed | Services placed at the disposal of DEO (M) Swat for further posting against SST (General) post. |

Terms and conditions:-

- 1 They would be on probation for a period of one year extendable for another one year.
- 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 preceded under the rules framed from time to time.
- 4 Charge report should be submitted to all concerned.
- 5 Their Inter-Se- seniority on lower post will remain intact.
- 6 No TA/DA is allowed for joining his duty.

C.T.A

39

will give an under taking to be recorded in their service book to the effect that if any over payment is made to him in light this order will be recovered and if he/she is wrongly promoted he/She will be reversed.
They will be governed by such rules and regulations as may be issued from time to time by the Govt.
Before handing over charge once again their document may be checked if they have not the required relevant qualifications as per rules, they may not be handed over charge of the post.

(Muhammad Rafiq Khattak)

Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst: No. 1287-02 / File No. 2/Promotion SST B-16: Dated Peshawar the 04/11/2018

Copy forwarded for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. District Education Officer concerned
3. District Accounts Officer concerned
4. Official 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

Dy: Director (Estab) 23/11/18
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

etc



(MALE) SWAT

38

NOTIFICATION

Consequent upon the service of the following SST regarding their promotion have been placed at the disposal of the undersigned by Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar vide his promotion order Endst: NO.1287-92/File No.2/Promotion SST, dated Peshawar the 04.01.2018. The undersigned has been pleased to adjust the following teachers on regular basis to the school noted against each their name subject to the terms and condition under reference from the date of their taking over charge in the interest of public service.

SST (GENERAL) PROMOTION OF SCT TO SST

| S.NO | NAME OF TEACHER | PRESENT SCHOOL | SCHOOL WHERE ADJUSTED IN B-16 | REMARKS |
|------|-----------------|------------------|-------------------------------|--------------------------------|
| 1. | Saeed Ahmad SCT | GHS No.4 Mingora | GHS Seer | Against vacant Post of SST (G) |
| 2. | Hamid Khan SCT | GHS Qandil | GHSS Fatehpur | -do- |
| 3. | Sahib Jan SCT | GHS Chuprial | GHS Beha | -do- |

SST (GENERAL) PROMOTION OF PSHT TO SST

| S.NO | NAME OF TEACHER | PRESENT SCHOOL | SCHOOL WHERE ADJUSTED IN B-16 | REMARKS |
|------|-----------------|----------------|-------------------------------|--------------------------------|
| 1. | Ibrahim PSHT | GPS Tahir Abad | GHS Banjot | Against vacant Post of SST (G) |

(NAWAB ALI)

DISTRICT EDUCATION OFFICER (M)

SWAT.

Endst: NO. 14391-99 /P.F/SST(G)/Promotion/V/Posi/DEO/Swat.

Dated 01/10/2018

Copy forwarded to:-

1. The Director E&SE Khyber Pakhtunkhwa Peshawar with reference to his office No. cited above.
2. The District Comptroller of Accounts Swat.
3. Dy DEO (M) local Office.
4. Principals/Head Masters concerned.
5. B&AO local Office.
6. Teacher concerned.
7. PA to DEO Local Office.

DISTRICT EDUCATION OFFICER (M)

SWAT.



DISTRICT EDUCATION OFFICER
(MALE) SWAT

40

CORRIGENDM.

In this office promotion order of SSTs issued vide Endst:No. 4896-99/P.F/SST (G)/Promotion/V/Post/DEO/Swat dated 01.02.2018. The following terms & conditions may be considered as incorporated as mentioned in the approval granted by the Director E&SE KPK Peshawar No.1287-92/File No.2/Promotion SST B-16 dated 04.01.2018. Rest of the contents remain the same.

1. they would be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulation 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 preceded under the rules framed from time to time.
4. Charge report should be submit to all concerned.
5. Their inter-Se-seniority on lower post will remain intact.
6. No TA/DA is allowed for joining his duty.
7. They will give an undertaking to be recorded in their service book to the effect that if any over payment is made to him in light this order will be recovered and if He is wrongly promoted he will be reversed.
8. They will governed by such rules and regulations as may be issued from time to time by the Government.
9. Before handing over charge once again the documents may be checked if they have not required relevant qualification as per rules, they may not be handed over charge of the post.

Endst: NO. 9177-78 /Promotion/SST

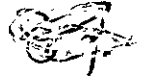
Copy forwarded to :-

1. Director E&SE KPK Peshawar.
2. DAO Swat.
3. The Principal GHS Seer, Fatehpur, GHS Beha and GCMHS Wadoodia.
4. Teachers concerned.
5. PA to DEO Swat

(NAWAB ALI)
DISTRICT EDUCATION OFFICER
MALE SWAT

Dated 20/2/2018

DISTRICT EDUCATION OFFICER
MALE SWAT



NOTIFICATION.

S No 3

Consequent upon recommendation of the Departmental Promotion Committee, and in pursuance of the Government of Khyber Pukhtunkhwa Elementary & Secondary Education Notification No. SO (B&A)/1-18/E&SE/2012, Finance Department Endorsement No. SO(FR)/FD/10-22(E)2010 dated 16/7/2012 and Director Elementary & Secondary Education Khyber Pukhtunkhwa Endstt; No.5517-22/ file No.2/Promotion Senior CT B-16 dated 22/12/2017, The following CTs BPS-15 are hereby promoted to the post of **Senior CT** in BPS-16 (Rs; 18910-1520- 64510) plus usual allowances as admissible under the rules on regular basis under the existing policy of the provincial Govt; on the terms and condition given below, with immediate effect in the interest of public service.

| S.# | Name of Teacher | Present Place of Posting | School where Posted | Remarks |
|-----|-------------------|--------------------------|---------------------|---------|
| 1 | Abdul Qayum | GMS Kalakhele | GHSS Nagrai | A.V.P |
| 2 | Asghar Khan | GMS Dab | GHS Dewana baba | A.V.P |
| 3 | Shamsur Rahim | GMS Bimadara | GHSS Amnawar | A.V.P |
| 4 | Shahi Roon | GHSS Bagra | GHSS Bagra | A.V.P |
| 5 | Harat Umar | GHSS Bagra | GHS Gokand | A.V.P |
| 6 | Ahmad Ghani | GHSS Agarai | GHSS Agarai | A.V.P |
| 7 | Muhammad Israr | GHS Sawawai | GHSS Ghurgushto | A.V.P |
| 8 | Ghani Said | GHS Mugh Dara | GHS Dagari | A.V.P |
| 9 | Nasib Ahmad Jan | GMS Dandar | GHSS Ghurgushto | A.V.P |
| 10 | Raf Ullah | GCMHS Daggari | GCMHS Daggari | A.V.P |
| 11 | Fazli Rahman | GHSS Gaziket | GHSS Totalai | A.V.P |
| 12 | Khurshed Jamil | GMS Maina Kawra | GHS Nawagai | A.V.P |
| 13 | Saib Noor | GHS Hisar | GHS Daggari No.2 | A.V.P |
| 14 | Muhammad Ali Khan | GHS Kalan | GHSS Totalai | A.V.P |
| 15 | Faz Muhammad | GHSS Agarai | GHSS Agarai | A.V.P |
| 16 | Fazir Rahman | GHS Karapa | GHS Cheena | A.V.P |
| 17 | Muhammad Ali | GHS Jamra | GHSS Totalai | A.V.P |
| 18 | Shafiqur Rahman | GHS Sura | GHSS Jangal | A.V.P |
| 19 | Saeed Noor | GHS Hisar | GHS Elai | A.V.P |

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| | | | |
|----------------|---------------|-------------|-------|
| Amjid Ali Khan | GHSS Chingali | GHSS Agarai | A.V.P |
| Fazli Amin | GMS Kankowai | GHSS Jangai | A.V.P |

(42)



TERMS & CONDITIONS.

1. They would be on probation for a period of one year, extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt. of Khyber Pakhtun Khwa.
3. Their services will be terminated at any time, in case their performance is found unsatisfactory during probationary period.
In case of misconduct, they will be proceeded under the rules framed from time to time.
4. Charge reports should be submitted to all concerned.
5. Their inter -Se-seniority on lower post will remain intact.
6. NO TADA etc is allowed.
7. They will give an undertaking to be recorded in their service books to the effect that if any over payment is made to them in light of this order, will be recovered and if he is wrongly promoted he will be reversed.

(BAKHT ZADA)
DISTRICT EDUCATION OFFICER (M)
DISTRICT BUNER

Endst: No. 688-94 / Dated 10 / 02 / 2018.

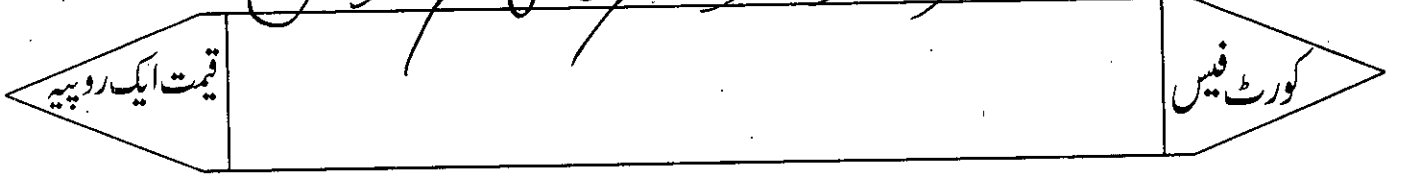
Copy forwarded for information and necessary action to the: -

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar, with r/to Endst: No 5517-22 / file No. 2/Promotion SCT B-16 dated 22/12/2017.
2. Deputy Commissioner Buner at Daggar.
3. District Nazim Buner.
4. District Monitoring Officer Buner
5. District Accounts Officer Buner.
6. Principals / Head Masters Concerned.
7. Officials Concerned.

DY; DISTRICT EDUCATION OFFICER (M)
DISTRICT BUNER

of-c

بعدالت خبر وختو خوا کروں لے بیونل



مورخہ

مقدمہ

دعویٰ

جرم

۶ اپریل ۲۰۱۸ء منجانب
عبد الرشاد بنام گورٹمنٹ و ممبر

باعث تحریر آنکہ

مقدمہ مندرجہ بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کارروائی متعلقہ آن مقام سروس لے بیونل کے لئے جس میں دی گئی ہے مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ و تقرر ثالث و فیصلہ پر حلف دینے جواب

دی اور اقبال دعویٰ اور درخواست ہر قسم کی تصدیق زر اس پر دستخط کرنے کا اختیار ہوگا نیز بصورت عدم پیروی یا ڈگری ایک طرف یا اپیل کی برآمد ہوگی اور منسوخ ڈائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ بصورت ضرورت مذکور کے نسل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنی ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا۔

اور صاحب مقرر شدہ کو بھی جملہ مذکورہ بالا اختیارات حاصل ہونگے اور اسکا ساختہ برواختہ منظور و قبول ہوگا اور دوران مقدمہ میں جو خرچہ و ہر جانہ التوائے مقدمہ کے سبب سے ہا گا اسکے مستحق وکیل صاحب ہونگے۔ نیز بقایا و خرچہ کی وصولی کرتے وقت کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام دورہ ہر ہو یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہونگے کی پیروی مقدمہ مذکور لہذا وکالت نامہ لکھ دیا ک سند ہے

المرقوم ۶ ماہ اپریل ۲۰۱۸ء

العبد گواہ شہیدہ العبد
سروس لے بیونل کے لئے منظور ہے
Attest