

30.06.2022

Counsel for the appellant present. Preliminary arguments heard. Record perused.

Rs-600/-
Appellant Deposited
Security & Process Fee

A. Singh
4/7/22

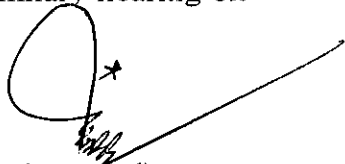
Points raised need consideration. Instant appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notice be issued to respondents for reply. To come up for reply/comments on 27.07.2022 before S.B.

Annexed with the memorandum of appeal, is an application for restraining the respondents to make initial recruitment on the available vacant post of SST (BPS-16) in Physics/Maths group in Sub Division Dara Adam Khel till decision of the main service appeal. Notice of the instant application be also issued to the respondents. In the meanwhile, respondents are directed ^{not} to make initial recruitment on the available vacant post of SST (BPS-16) in Physics/Maths group in Sub Division Dara Adam Khel till the decision of the main service appeal.


(Fareeha Paul)
Member (E)

27.05.2022


Clerk to counsel for the appellant present and requested for adjournment on the ground that counsel for the appellant is not available today due to general strike of the Bar. Adjourned. to come up for preliminary hearing on 28.06.2022. before S.B.



(Mian Muhammad)
Member (E)

28.06.2022

Learned counsel for the appellant present and requested for adjournment in order to further prepare the brief. Adjourned. To come up for preliminary arguments on 30.06.2022 before S.B.




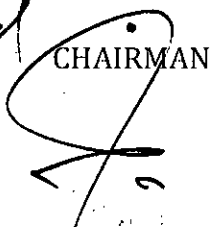
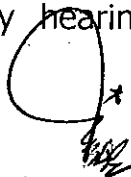
(Fareeha Paul)
Member (E)

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 421/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	24/03/2022	<p>The appeal of Dr. Shafiq Khan presented today by Mr. Taimur Ali Khan 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</p>
2-	<p><i>Noted by counsel 8/4/22</i></p>	<p>This case is entrusted to Single Bench at Peshawar for preliminary hearing to be put there on <u>16.05.2022</u></p> <p><i>appellant / counsel</i> NOTICE to the</p> <p style="text-align: right;"> CHAIRMAN</p>
	16.05.2022	<p>Learned counsel for the appellant present and requested for adjournment in order to further prepare the brief. To come up for preliminary hearing on 27.05.2022 before S.B.</p> <p style="text-align: right;"> (Mian Muhammad) Member(E)</p>

**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
CHECKLIST**

Case Title: Shafiq Khan vs E D U Deptt.

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

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

Name: _____

Faimur Ali Khan

Signature: _____

[Handwritten Signature]

Dated: _____

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

SERVICE APPEAL NO. 421 /2022

Shafiq Khan

V/S

Education Department

INDEX

S.NO.	Documents	Annexure	Page No.
1.	Memo of appeal	-----	01-04
2.	Affidavit	-----	05
3.	Application along with annexure-R-1	-----	06-07
4.	Copy of documents	A	08-09
5.	Copy of notification dated 15.04.2014	B	10
6.	Copy of notification/Rules dated 24.07.2014	C	11-17
7.	Copies of relevant degree/ transcript	D	18-21
8.	Copies of seniority list and detail of statement Education Officer TSD Dare Kohat, detail of 1 vacant post of 2021-2022 and detail of vacant posts of 2020	E,F,G,&H	22-25
9.	Copy of departmental appeal	I	26-27
10.	Vakalat Nama	-----	28

APPELLANT

THROUGH:


TAIMUR ALI KHAN
(ADVOCATE HIGH COURT)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

SERVICE APPEAL NO. _____/2022

Mr. Shafiq Khan, SCT (BS-16),
GHS Darra Adam Khel, Kohat.

(APPELLANT)

VERSUS

1. The Secretary Elementary & Secondary Education Khyber Pakhtunkhwa, Civil Secretariat Peshawar.
2. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
3. The Additional Director (Merged Districts), Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
4. The District Education Officer, Sub Division Darra Adam Khel, Kohat.

(RESPONDENTS)

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNALS ACT 1974, AGAINST THE IMPUGNED ACTION OF THE RESPONDENTS OF NOT PROMOTING THE APPELLANT ON THE POST OF SST (BS-16) IN PHYSICS/MATHS GROUP UNDER 40% PROMOTION QUOTA FROM SCT (BPS-16) DESPITE THE AVAILABILITY OF POST IN HIS QUOTA AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN WITHIN STATUTORY PERIOD 90 DAYS.

PRAYER:

THAT ON THE ACCEPTANCE OF THIS APPEAL, THE RESPONDENTS MAY KINDLY BE DIRECTED TO THE CONSIDER THE APPELLANT FOR PROMOTION TO THE VACANT/AVAILABLE POST OF SST BS-16 IN

PHYSICS/MATHS GROUP UNDER 40% PROMOTION QUOTA OF SCT (BS-16). ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.

RESPECTFULLY SHEWETH:

FACTS:

1. That the appellant is well qualified having MSc, MEd degrees and joined the respondent department as CT in the year 1990 and since his appointment he is performing his duty up to the entire satisfaction of his superiors and no complaint has been filed against him. **(Copy of documents are attached as Annexure-A)**
2. That the appellant was promoted to the post of SCT (BS-16) along with other officials vide notification dated 15.04.2014. **(Copy of notification dated 15.04.2014 is attached as Annexure-B)**
3. That the Department issued a notification/rules on 24.07.2014, wherein the post of SST (BS-16) can be filled through 75% promotion quota on the basis of seniority-cum-fitness from the concerned District and 75% promotion quota was further bifurcate in the manner that 40% from amongst the Senior Certified Teacher (BPS-16) with at least five years as Senior Certified Teacher and Certified Teacher having qualification of second class Bachelor Degree from recognized University from the groups with two subject with Chemistry, Botany or Zoology or Physics Maths "A" or "B" or Statistics or Humanities or other equivalent groups at degree level with English as compulsory subject and Bachelor of Education or Master of Education. **(Copy of notification/Rules dated 24.07.2014 is attached as Annexure-C)**
4. That the appellant has done BSc degree in the year 1991, but due to requirement of Physics/Maths for promotion to the post of SST (BS-16), the appellant did Physics as additional subject on 16.11.2020. **(Copies of relevant degree/ transcript are attached as Annexure-D)**
5. That the appellant was on the top of the seniority list of SCT (BS-16) of Physics/Maths group and the post of SST (BS-16) is vacant in

Tehsil Sub Division Darra Adam Keel in Physics/Maths group, which is evident from the statement given by the Education Officer TSD Darra Kohat and detail of vacant post of SSTs (BPS-16) for advertisement 2021-2022 (Male), but in spite that the appellant was not promoted to the post of SST (BPS-16) on the vacant/available post in 40% promotion quota of SCT (BPS-16). It is pertinent to mention that 8 posts of SSTs (BS-16) in Physics Maths Group were vacant in sub Division Dara Adm Khel in 2020, but all those posts were filled through initial recruitment. **(Copies of seniority list and detail of statement Education Officer TSD Dare Kohat, detail of 1 vacant post of 2021-2022 and detail of vacant posts of 2020 are attached as Annexure-E,F,G&H)**

6. That as the appellant is one the top of seniority of Physics/Maths group and post of SST (BPS-16) is also available in Physics/Math group, but despite that the appellant was not promoted to the post SST (BPS-16), therefore, he filed departmental for promotion to the post of SST (BPS-16) on 13.12.2021, which was not responded within the statutory period of ninety days. **(Copy of departmental appeal is attached as Annexure-I)**
7. That the appellant has no other remedy except to file the instant service appeal in this Honourable Service Tribunal on the following grounds amongst others.

GROUND:

- A) That not taking action on the departmental appeal of the appellant within the statutory period of ninety days and not considering the appellant for promotion on the post of SST (BPS-16) in Physics/Maths group under 40% quota of SCT (BPS-16) are against the law, rules, norms of justice and material on record, therefore, not tenable.
- B) That the appellant is on the top of the seniority list of SCT (BPS-16) in Physics/Maths group and the post of SST (BPS-16) is also vacant/available, therefore it is the legal right of the appellant to be promoted on the post of SST (BPS-16) in Physics Maths group on 40% promotion quota of SCT (BPS-16) on the vacant/available post being eligible and senior most.
- C) That not promoting the appellant on the vacant post of the SST (BPS-16) in Physics/Maths group under 40% promotion quota of SCT

(BPS-16) being eligible and on the top of seniority of Physics/Maths group by the respondents showing arbitrariness on the part of respondents.

- D) That 40% promotion quota of SCT (BPS-16) of the department is still in filed and the appellant being senior most is eligible for promotion to the post of SST (BPS-16) on the basis of that 40% promotion quota of SCT (BPS-16).
- E) That depriving the appellant from his legal right of promotion to the post of SST (BPS-16) in Physics/Maths group under 40% promotion quota of SCT (BPS-16) by the respondents will damage the service carrier of the appellant both in monitoring benefits as well as in further promotion chances.
- F) That the appellant has not been treated according to law and rules and has deprived from his legal right of promotion to the post of SST (BPS-16) in Physics/Maths group under 40% promotion quota of SCT (BPS-16).
- G) That 8 posts of SST (BPS-16) in Physics Maths group were vacant in the Sub Division Darra Adam Khel in the year 2020 and all the posts were filled through initial recruitment and now 1 post of SST (BPS-16) in Sub Division Darra Adam Khel is vacant and the respondents also wants to fill this vacant post through initial recruitment by advertising that vacant post without observing the promotion quota of SST (BPS-16), which is against the law and rules notified on 24.07.2014.
- H) That the appellant seeks permission of this Honourable Tribunal to advance others grounds and proofs at the time of hearing.

It is, therefore most humbly prayed that the appeal of the appellant may be accepted as prayed for.


APPELLANT
Shafiq Khan

THROUGH:


TAIMUR ALI KHAN
(ADVOCATE HIGH COURT)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

SERVICE APPEAL NO. _____/2022

Shafiq Khan

V/S

Education Department

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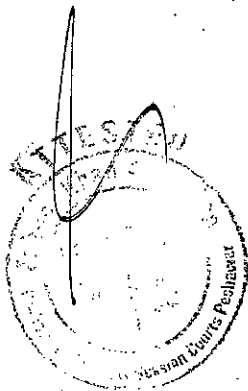
AFFIDAVIT

I, Shafiq Khan, SCT (BS-16), GHS Darra Adam Khel, Kohat, (Appellant) do hereby affirm and declare that the contents of this service appeal are true and correct and nothing has been concealed from this Honourable Tribunal.

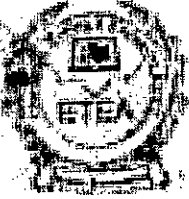


DEPONENT

Shafiq Khan
(APPELLANT)



R-1



IMPORTANT ANNOUNCEMENT SCREENING TESTS SCHEDULE FOR FEBRUARY 2022

S. NO.	POSITION	DEPARTMENT	DATE*
1	Computer Operator	C&W Department (CE-Centre) 2021 (Ph-II)	Feb 13
2	Multiple Positions	Public Sector Organization	Feb 15 and 16
3	Forester & Forest Guard	Pakistan Forest Institute	Feb 15
4	SST (Bio-Chemistry)	Education Department	Feb 19
5	SST (Physics-Math)	Education Department	Feb 19
6	A-1 Promotional EXAM	Police Department	Feb 20
7	Junior Clerk	BISE Mardan	Feb 22
8	Multiple Positions	Pakhtunkhwa Highways Authority	Feb 23 and 24
9	SST (General)	Education Department	Feb 27
8	SST (IT)	Education Department	Feb 27

* Scheduled tentatively. Subject to change due to unavoidable reasons. For updates, regularly visit ETEA's website and Facebook Page.

EDUCATIONAL TESTING AND EVALUATION AGENCY (ETEA)

<https://etea.edu.pk/>

f ETEAOFFICIALPK



091-9219049, 091-9219078

Serial No. 000282

University of Lakki Marwat,
Khyber Pakhtunkhwa, Pakistan



CNIC: 22401-8516564-1

Roll No. 85935

Registration No. 2020-ULM-KPP-014211

Result declared on March 31, 2021

(Session/Year 2020 - Annual)

Shafiq Khan S/O Mehrab Din

and a student of District Kohat (Private Candidate)

having passed the prescribed examination in March 2021

is this day admitted by the

University of Lakki Marwat

to the DEGREE of **MASTER OF SCIENCE**

together with all honours, rights and privileges belonging to the degree in witness
whereof this Degree is granted

in Mathematics

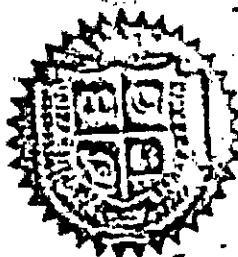
in 2nd Division/CGPA in aggregate.

The Examination was taken as a Whole

Controller of Examinations

Registrar

Vice Chancellor



9

Allama Iqbal Open University Islamabad



Serial No. A025936

Certified that Mr./Ms. SHAFIQ KHAN

Son / Daughter of MEHRAB DIN

Registration No: B4NKTD423

Roll No: AT624580

having completed the prescribed requirements in semester

SPRING 2015

is awarded the degree of:

MASTER OF EDUCATION (M.ED)

He/She has secured 84 % marks and has been placed in B grade.

M. Khan
CONTROLLER OF EXAMINATIONS

Result declared on: March 08, 2018

Date of issue: December 17, 2018



[Signature]
VICE-CHANCELLOR

THIS DEGREE IS TO BE READ IN CONJUNCTION WITH THE TRANSCRIPT. ISSUED SEPARATELY

Notification

In pursuance of the Elementary & Secondary Education Department Khyber Pakhtunkhwa Notification No (B&A) 1-18/E&SE 2012 dated 11/7/2012 and consequent upon recommendation of Departmental Promotion Committee, the following C.Ts B-15 (Male) in FR Kohat are hereby up-graded to the post of Senior C.T (B-16) Rs.(10000-800-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of Provincial Govt. in teaching cadre. They are placed at the disposal of AEO FR Kohat for further adjustment on the terms & conditions mentioned below with immediate effect.

S.No	Name of "Teachers	Place of posting	Remarks
1	Gu' Rahman	GHS.Suni Khel	Considered suitable for promotion of the post of Senior C.T BPS-16 on regular basis with immediate effect.
2	Khalid ur Rahman	GHS.Akhur Wali	-do-
3	Sultan Hussain	Cl. S. Paya	-do-
4	Yar Soid Khan	GHS.Akhur Wali	-do-
5	Nowsherwan	GHS.Shehrakai	-do-
6	Abdul Ghaffar	GHS.Toor Chapper	-do-
7	Gu. Zar Jan	GMS.Landi Khel	-do-
8	Amanullah	GHS.Shehrakai	-do-
9	Ga Jhar Ail Shah	GHS.Darra Adam Khel	-do-
10	Khushal Khan	GHS.Darra Adam Khel	-do-
11	Islam ud Din	GHS.Akhurwal	-do-
12	Monammad Ayoub	GHS.Shin Dhand	-do-
13	Aurang Zeb	GHS.Suni Khel	-do-
14	Mo'hammad Asgher	GHS.Shin Dhand	-do-
15	Mo'hammad Tariq	GHS.Gadia Khel	-do-
16	Jar nas Khan	GMS.Nazim Khel Turki Ismai	-do-
17	Nazir Hussain	GHS.Shpalkwal	-do-
18	Saifur Rahman	GHS.Shehrakai	-do-
19	Inayat Khan	GMS.Tor Tandi	-do-
20	Younas Khan	GHS.Bosti Khel	-do-
21	Wakeel Khan	GHS.Suni Khel	-do-
22	Muhammad Aziz	GHS.Toor Chappar	-do-
23	Shafiq Khan	GHS.Darra Adam Khel	-do-
24	Abdul Wahheed	GMS.Gadia Khel	-do-
25	Taj Muhammad	GHS.Furki Ismail Khel	-do-
26	Mu'karam Khan	GMS.Kohiwal	-do-
27	Mardan Gul	GHS.Ara Khel	-do-
28	Rah Nawaz	GHS.Darra Adam Khel	-do-
29	Muhammad Shafi	GHS.Akhurwal	-do-
30	Sahir Khan	GMS.Shehrakai Bala	-do-
31	Raz Muhammad	GMS.Sra Meia	-do-

Terms and Conditions

- 1 They will be on probation for a period of one year extendable for another one year.
- 2 They will be governed by such rules and regulations issued from time to time by the Government
- 3 Their services can be terminated at any time, in case their performance is found unsatisfactory during probation period in case of misconduct they will be preceded under the rules framed from time to time
- 4 Charge reports should be submitted to all concerned.
- 5 Their inter seniority on lower post will remain intact.
- 6 No T.A/DA is allowed for joining his/her duty.
- 7 They will give an under taking to be recorded in their service Books to the effect that if any over payment made to them in the light of this order will be recovered from them and if they are wrongly promoted they will be reversed

(Muhammad Islam Bangash)
 Director Education FATA

Endst.No. 41254-90

Dated Pesh:the 15/11/2014

Copy forwarded to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
2. Accountant General, Khyber Pakhtunkhwa Peshawar.
3. District Accounts Officer concerned.
4. Agency Education Officer FR Kohat
5. Official concerned.
6. F.A to Director Education FATA.

Additional Director (Estab)
 Directorate of Education FATA

(Handwritten scribbles)

B

6



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 sub rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department hereby directs that in this Department's Notifications No.SO(G)S&L/1-28/2003/Vol-II dated, 09-04-2004, Notification No.SO(G)S&L/1-69/06/Vol-1/DPE/LIB dated, 13-11-2007, and Notification No.SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre, dated, 13-11-2012, the following further amendments shall be made, namely:

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 shall be inserted in respective columns, namely:

1	2	3	4	5
1B	Subject Specialist (BPS-17)	i. At least second class Master's Degree or four years B.A. 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, on the basis of seniority-cum-fitness, for the relevant subject from amongst the Secondary School Teachers (BPS-16), with at least five years service as such and having qualification mentioned in column No. 3. Note: If no suitable candidate is available in the relevant subject the post falling in this promotion quota shall be filled by initial

(1)

(Handwritten mark)

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1A	Director Physical Education (BPS-17)	At least second class Master's Degree in Physical Education from a recognized University.	22-35 years	<p>(b) fifty percent by initial recruitment.</p> <p>(a) Fifty percent by promotion, on the basis of seniority-cum-fitness, from amongst Senior Physical Education Teachers (BPS-16), with at least five years service as Senior Physical Education Teacher and Physical Education Teacher and having qualification mentioned in column No. 3:</p> <p><i>Provided that if no suitable person is available from amongst Senior Physical Education Teachers for promotion then 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 and having qualification mentioned in column No. 3:</i></p> <p><i>Note:- If no suitable candidate is available in the relevant cadres of the above teachers the post falling in their promotion quota shall be filled by initial recruitment; and</i></p> <p><i>(b) fifty percent by initial recruitment; and</i></p>
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(ii) *applicable Serial No. 1B, as so numbered, for the existing entries, the following shall be substituted, in respective columns, namely:*

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

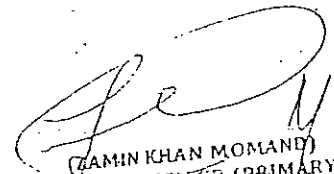
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SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

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, (PIIE) 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.
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


(JAMN KHAN MOMAND)
SECTION OFFICER (PRIMARY)

23

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

University of Peshawar
(Pakistan)

Session ANNUAL 1991

SHAFTO KHAN Son of MEHRAB DIN and a student
of GOVT. COLLEGE DARA ADAM KHEL having passed the prescribed examination
held in JULY 1991, is this day admitted by the University of Peshawar,
to the Degree of

Bachelor of Science

in the SECOND Division

The Examination was taken as a whole / in parts

Serial No. 006879

Registered No. 68-DK-397

Roll No. 43297

Result Declared on 3RD MARCH 1992



Anakul Ahmad

Registrar

Countersigned

Zameer
Vice-Chancellor



UNIVERSITY OF PESHAWAR

(PAKISTAN)

PASSED/RE-APPEAR

43297

DETAILED MARKS CERTIFICATE

B. Sc. EXAMINATION, 1991 (ANNUAL)

Mr./Ms. Shafiq Khan Roll Number 43297
The candidate secured the following marks and is placed in II Division.

SUBJECTS	MARKS		
	allotted	obtained	In words
1. English	150	56	Fifty six
2. Chemistry	150	71	Seventy one
3. Maths A	150	78	Seventy eight
4. ISLAMIC STUDIES (Compulsory)	60	33	Thirty three
5. PAKISTAN STUDIES.	40	13	Thirteen
Total	550	251	Two hundred & fifty one

The examination was taken as a ~~WHOLE~~ IN/PARTS ✓

Result Declaration date 3-3-1992

Date 19

CONTROLLER OF EXAMINATIONS
UNIVERSITY OF PESHAWAR
PAKISTAN.

M

20

No. 62352

No. 062352

UNIVERSITY OF PESHAWAR

PAKISTAN



DETAILED MARKS CERTIFICATE B. A. ANNUAL EXAMINATION, 1994

Mr. / Ms. Shafiq Khan

Certified that the candidate secured the following marks and is placed in XXXX Division

SUBJECTS	MARKS ALLOTTED	MARKS OBTAINED	MARKS IN WORDS
	<i>Additional</i>		
1. <i>English</i>	150		
2. <i>Islamic Studies</i>	150	68	Sixty eight
3. <i>Mathematics-B</i>	150	77	Seventy seven
4. <i>Pakistan Studies</i>	40		
5. <i>Islamiat (Compulsory)</i>	60		
TOTAL	550 300	145 145/300	one Hundred and Forty Five

Errors & omissions are subject to subsequent rectification.

The Examination was taken as a **WHOLE / IN-PARTS.**

112 MAR 1995

RESULT DECLARATION DATE _____

DATED _____

Verified and Found Correct

 Controller of Examinations
 University of Peshawar

CONTROLLER OF EXAMINATIONS
UNIVERSITY OF PESHAWAR



UNIVERSITY OF LAKKI MARWAT

Khyber Pakhtunkhwa, Pakistan

21

No: 008582

TRANSCRIPT

ADDITIONAL SUBJECT IN BACHELOR OF SCIENCE

2020 - Annual

Institute/ Department Name: (Private Candidate)

Name: Shafiq Khan
Father Name: Mehrab Din
Registration No: 2020-ULM-KPP-007776

Roll No: 75988

PART-I

Subjects	Marks	Marks Obtained			
		Th	Prac	Total	In Words
Physics	75	24	10	34	Thirty Four
Total: 75, Obtained: 34 (Thirty Four), 45%				Remarks: Pass	

PART-II

Subjects	Marks	Marks Obtained			
		Th	Prac	Total	In Words
Physics	75	28	12	40	Forty
Total: 75, Obtained: 40 (Forty), 53%				Remarks: Pass	

Total Marks: 150	Obtained Marks: 74 (Seventy Four)	49% Pass
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The Examination was taken as a Whole

Exam Held in Oct, 2020
Result Declaration Date: Nov 16, 2020
Issue Date: Jan 05, 2021

Prepared By

Checked By

Controller of Examination

Errors and omissions if any are subject to rectification.

Final Seniority List of C/T Male Teachers in R/O TSD Darra Kohat

SH	Seri No.	NAME	FATHER NAME	School	D/O Birth	Desig	DPS	Qualification		D/O M. App	D/O Prom	Domicile	Remarks
								Asst	Prof				
1	1	Khalil Ur	M. Alam	GHS Akhurwal	23/03/65	S.CT	16	BA	CT	13/1987	20/02/2013	SWA	
2	2	Abdul Ghafor	Mia Gul	GHS Tor Chapper	15/04/65	S.CT	16	BA	DI	9/8/1988	20/02/2013	Charsada	
3	3	Gul Zar Jan	Abdullah Jan	GHS Akhurwal	3/3/1968	S.CT	16	BA	CT/B	26/08/1989	20/02/2013	F.R Kohat	BA 3 rd Division
4	4	M. Asghar	Gul Asghar	GHS Sheendhand.	1/6/1966	S.CT	16	MA	CT/B.	22/11/1992	20/02/2013	F.R Kohat	
5	5	Nazir Hussain	Ghulam Jan	GHS Shpalkiwal	24/01/68	S.CT	16	BA	CT/B.	29/01/1993	20/02/2013	F.R Kohat	
6	6	Saif ur Rehman	Muhammad	GHS Sheraki	1/2/1967	S.CT	16	MA	CT/B.	5/5/1993	20/02/2013	F.R Kohat	
7	7	Younas Khan	Feroz Khan	GHS Bosti Khel	16/05/65	S.CT	16	MA	CT/B.	25/12/1993	20/02/2013	F.R Kohat	
8	8	Wakil Khan	Sardar Khan	GHS Suni Khel	13/02/66	S.CT	16	BA	CT/B.	25/12/1993	20/02/2013	F.R Kohat	
9	9	M. Aziz	Sher Afzal	GHS Sheendhand	2/2/1969	S.CT	16	MA	CT/B.	25/12/1993	20/02/2013	F.R Kohat	
10	10	Shafiq Khan	Mehrab Din	GHS Darra Adam	6/4/1969	S.CT	16	MSc	CT/M.	25/12/1993	20/02/2013	F.R Kohat	Physic Maths
11	11	Taj Muhammad	Wazir Khan	GHS T.I Khel	3/1/1968	S.CT	16	MA	CT/M.	1/9/1994	20/02/2013	F.R Kohat	
12	12	Raz Muhammad	Yar Muhammad	GHS Bosti Khel	7/11/1968	S.CT	16	BS	CT/M.	2/11/1994	20/02/2013	F.R Kohat	
13	13	M. Shafi	Pir M. Shah	GHS Akhurwal	2/3/1965	S.CT	16	MA	CT/M.	18/11/1994	20/02/2013	F.R Kohat	
14	14	Sabir Khan	Wajal Khan	GHS Bosti Khel	13/04/67	S.CT	16	MA	CT/B.	15/01/1995	20/02/2013	F.R Kohat	
15	15	M. Akram	Loban Shah	GHS Ara Khel	10/4/1966	S.CT	16	MA	CT/B.	9/10/1995	30/05/2018	F.R Kohat	
16	16	Said Habib	Ghulam Habib	GHS Paya	20/05/66	S.CT	16	BA	CT/B.	9/10/1995	30/05/2018	F.R Kohat	
17	17	M. Ishaq	Yar Muhammad	GHS Dara Adam	8/1/1969	S.CT	16	BA	CT/B.	9/10/1995	30/05/2018	F.R Kohat	
18	18	Syedna	Sawan Khan	GHS Bosti Khel	10/4/1969	S.CT	16	MA	CT/M.	16/10/1995	30/05/2018	F.R Kohat	
19	19	Asghar Khan	Mewa Khan	GHS Tor Chapper	10/12/1970	S.CT	16	MS	CT/B.	18/10/1995	30/05/2018	F.R Kohat	
20	20	Ihsan Ud Din	Subhan Ud Din	GHS Darra Adam	30/03/66	S.CT	16	MA	CT/M.	25/10/1995	30/05/2018	F.R Kohat	
21	21	Naseeb Gul	Mehraj Gul	GHS Akhurwal	28/06/67	S.CT	16	BA	CT/B.	25/10/1995	30/05/2018	F.R Kohat	BA 3 rd (D)
22	22	Khalil ur	Naiz Mir	GHS Sheraki F.R.	15/01/69	S.CT	16	MA	CT/M.	25/10/1995	30/05/2018	F.R Kohat	
23	23	Gul Munir	Iqbal Khan	GHS Suni Khel	15/01/68	S.CT	16	MA	CT/B.	5/11/1995	30/05/2018	F.R Kohat	
24	24	M. Yousaf	M. Rafiq	GHS Paya	15/11/65	SCI	16	BA	CT/B.	14/12/1995		F.R Kohat	1 Step

Science

OFFICE OF THE DISTRICT EDUCATION OFFICER TSD DARRA (MALE) 2021

STATEMENT SHOWING THE SCHOOLWISE DETAIL OF FOLLOWING VACANT POSTS AS STOOD ON 01/09/2021

S.NO	EMIS CODE	NAME OF SCHOOL	SST GEN	SST BIO/CHEM	SST-M/P	SST-IT	TOTAL
			1	2	3	4	
1	62167	GHS Guzdarra	1	1			2
2	62112	GHS Darra Adam khel ✓		1	1		2
3	62187	GMS Jammu	1				1
Total			2	2	1		5

Education Officer
TSD Darra Kohat



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION, KHYBER PAKHTUNKHWA, PESHAWAR

DETAIL OF VACANT POST OF SSTs (BPS-16) FOR ADVERTISEMENT 2021-22 [MALE]

924

Sr. No.	District	SST General	SST (Sci) Bio Chemistry	SST (Sci) Math Physics	SST-IT B-16	Total SSTs Male
1	Peshawar	14	5	3	3	25
2	Mardan	7	1	1	0	9
3	Charsadda	4	2	1	0	7
4	Nowshera	5	0	0	0	5
5	Swabi	5	2	0	0	7
6	Kohat	4	2	2	0	8
7	Karak	4	0	1	0	5
8	Bannu	6	1	1	1	9
9	Tank	0	0	0	0	0
10	Lakki Marwat	8	0	0	0	8
11	DI Khan	11	3	2	0	16
12	Hangu	3	0	0	0	3
13	Swat	17	5	2	2	26
14	Abbott Abad	5	4	3	0	12
15	Batta Gram	3	1	1	0	5
16	Buner	9	1	2	0	12
17	Chitral Upper	3	1	2	0	6
18	Chitral Lower	1	0	0	2	3
19	Dir Lower	7	1	1	1	10
20	Dir Upper	2	3	3	2	10
21	Haripur	6	4	3	0	13
22	Kolai Palas	0	0	1	0	1
23	Kohistan Upper	0	0	0	0	0
24	Kohistan Lower	1	0	0	0	1
25	Malakand	3	1	2	0	6
26	Mansehra	23	5	14	0	42
27	Shangla	5	0	2	3	10
28	Tor Ghar	0	0	0	0	0
29	Bajawar	5	0	0	0	5
30	Mohmand	6	6	2	5	19
31	Khyber	0	0	0	0	0
32	Orakzai	2	3	7	2	14
33	Kurram	2	0	1	0	3
34	North Waziristan	1	1	2	3	7
35	South Waziristan	0	0	0	3	3
36	SD Hassan Khel	1	0	0	0	1
37	SD Dara Adam Khel	2	2	1	0	5
38	SD Wazir Bannu	0	0	0	0	0
39	SD Bhattani Lakki	0	0	0	0	0
40	SD Darazinda DIKhan	1	0	0	0	1
41	SD Tank Jandola	0	0	0	3	3
	Grand Total	176	54	60	30	320

VACANT POSITION OF BS-16 AND BELOW (M&F) TEACHING CADRE MERGED DISTRICTS AS STOOD ON 21-10-2020

S.#	District	SST (Gen) (B-16)		SST (Phy / Maths)		SST (Bio / Chem)		SST (IT) (B-16)		Total		CT (B-15)		DM (B-15)		PET (B-15)		AT (B-15)		TT (B-15)		Qari (B-12)		CT (IT) / Lab in charge		PST (B-12)		Total	
		M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F
		1	Bajour	8	9	7	4	3	4	10	1	28	18	38	19	32	16	36	20	34	16	2	0	4	5	0	0	91	55
2	Mohmand	11	7	4	6	5	5	4	2	24	20	33	30	15	22	14	21	15	22	6	1	2	2	0	0	58	34	143	132
3	Khyber	35	18	14	5	13	7	10	5	72	35	68	43	23	19	28	23	25	38	3	2	11	7	11	5	104	102	273	239
4	Orakzai	7	10	10	3	6	4	7	0	30	17	28	55	24	39	21	37	21	40	0	0	6	7	0	0	65	42	165	220
5	Kurram	14	11	6	2	7	1	7	0	34	14	26	23	26	22	15	25	33	34	0	0	17	9	8	4	104	62	229	179
6	North Wazirist	10	12	6	2	4	0	6	0	26	14	44	64	12	33	13	32	16	32	4	2	6	0	0	0	21	60	116	223
7	South Wazirist	29	13	8	3	10	5	7	1	54	22	32	12	22	12	20	12	21	12	3	0	8	2	0	3	37	0	143	53
8	SD HS Khel	0	2	1	0	2	0	5	0	8	2	3	9	2	6	2	5	2	6	0	0	0	0	0	0	13	14	22	40
9	SD DA Khel	4	0	8	1	3	0	6	2	21	3	1	6	2	4	0	5	1	9	0	0	1	0	5	2	13	6	23	32
10	SD Wazir	2	3	1	1	2	1	13	4	18	9	10	13	4	7	3	6	4	6	1	0	0	1	3	3	12	32	37	68
11	SD Bhattani	2	0	0	2	0	1	0	1	2	4	3	2	1	0	0	0	0	1	2	0	0	0	0	0	9	7	15	10
12	SD Darazinda	5	1	3	2	1	0	4	0	13	3	13	7	8	5	7	5	8	5	0	0	2	0	0	0	26	18	64	40
13	SD Jandola	5	3	1	1	1	0	2	2	9	6	15	10	10	10	10	9	15	13	0	0	1	1	0	2	12	4	63	49
	Total:-	132	89	69	32	57	28	81	18	339	167	314	293	181	195	169	200	195	234	21	5	58	34	27	19	565	436	1530	1416

1	Vacant positions of SST BS-16 Male	339
2	Vacant positions of SST BS-16 Female	167
	Total	506
3	Vacant positions below BS-16 Male	1530
4	Vacant positions below BS-16 Female	1416
	Total	2946
	Grand Total	3452

Deputy Director (Estab)
Merged Districts

I (26)

To

The Director of Education,
Newly merged Districts KPK.

Subject: promotion from SCT to SST phy-maths

Sir,

It is bring into your kind information that one post of SST phy-maths is laying vacant at GHS AKHORWAL T.S.D Darra Kohat. This is besides the eight seats that were preliminary allotted to ETEA in 2020.

I am the senior most teacher of my own Tehsil T.S.D Darra Kohat. Out of 75% inservice quota, promotion is my right.

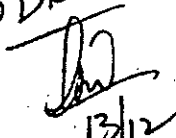
Therefore, I request you to issue orders for my promotion from SCT to SST phy-maths on the said post during the current DPC 2021.

Thanks

Date: 13-12-2021

yours Truly,

Shafiq Khan SCT/MSc MED
GHS Darra Adam Khel,
T.S.D Darra Kohat. 0333 9398435

DDECM

13/12

Despatch No: 3734 Dated: 13-12-2021



DIRECTORATE OF ELEMENTARY &
SECONDARY EDUCATION, KHYBER
PAKHTUNKHWA

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11/01/2022

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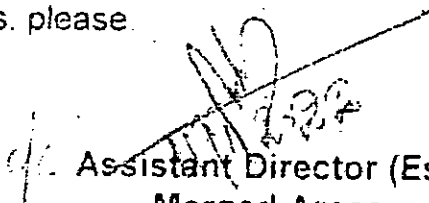
To

The District Education Officer,
Sub Division Darra Adam Khel Kohat

Subject: - Promotion from SCT to SST P/M

I am directed to refer to the subject cited above and to enclose here with a copy of appeal in respect of Mr. Shafiq Khan SCT GHS Darra Adam Khel Sub Division Darra Adam Khel Kohat for your perusal and further necessary action please

In this regard, I am directed to ask you to submit your comments/report to this office on priority basis, please.


Assistant Director (Estab)
Merged Areas

Endst: No. 459 / 1

Copy of the above is forwarded to the:-

1. PA to Additional Director (Merged Districts) Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar


Assistant Director (Estab)
Merged Areas

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VAKALAT NAMA

NO. _____/2021

IN THE COURT OF KP Service Tribunal, Peshawar

Shafiq Khan (Appellant)
(Petitioner)
(Plaintiff)

VERSUS

Education Deptt (Respondent)
(Defendant)

I/We, Shafiq Khan

Do hereby appoint and constitute **Taimur Ali Khan, Advocate High Court Peshawar**, to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.

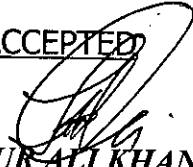
I/We authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

Dated _____/2021



(CLIENT)

ACCEPTED


TAIMUR ALI KHAN
Advocate High Court
BC-10-4240
CNIC: 17101-7395544-5
Cell No. 0333-9390916

OFFICE:

Room # FR-8, 4th Floor,
Bilour Plaza, Peshawar,
Cantt: Peshawar