

09.05.2022

Appellant present through counsel. Preliminary arguments heard. Record perused.

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 submission of written reply/comments. To come up for reply/comments on 15.06.2022 before S.B.

Rs 500  
Appellant's Security  
Sub. Process Fee  
15/5/22

(Rozina Rehman)  
Member (J)

15<sup>th</sup> June 2022

Counsel for the appellant present. Mr. Kabirullah Khattak, Addl. AG alongwith Noor Badshah (Litigation Officer) for the respondents present.

Respondents have not submitted written reply/comments. The learned AAG seeks time for submission of written reply/comments. Last chance is given. To come up for written reply/comments on 03.08.2022 before S.B.

15/6/22  
15/6/22  
15/6/22

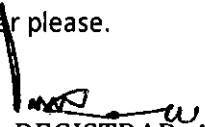


(Kalim Arshad Khan)  
Chairman

Form- A

FORM OF ORDER SHEET

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

Case No.- \_\_\_\_\_ 7933 /2021

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge   |
|-------|---------------------------|--|
| 1     | 2                         | 3  |
| 1-    | 24/12/2021                | <p>The appeal of Mr. Muhammad Ilyas resubmitted today by Mr. Noor Muhammad Khattak 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;"><br/>REGISTRAR</p>   |
| 2-    | 14.02.2022                | <p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put up there on <u>14/02/22</u>.</p> <p style="text-align: right;"><br/>CHAIRMAN</p> <p>Due to retirement of the Worthy Chairman the Tribunal is defunct, therefore, case is adjourned to 09.05.2022.for the same as before.</p> <p style="text-align: right;"><br/>Reader</p> |

The appeal of Mr. Muhammad Ilyas, SST (BPS-16), GHS Kog Pand, Distric Mohmand received today i.e. on 09.12.2021 is incomplete on the following score which is returned to the counsel for the appellat for completion and resubmission within 15 days.

1. Annexure A, B and C attached with the appeal are illegible which may be replaced by legible/better one.


No. 2455 /S.T,

Dt. 09/12/2021

Mr. Noor Muhammad Khattak  
Advocate Peshawar.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Resubmitted after Completion.

  
24/12/21

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

SERVICE APPEAL NO. 7933 /2021

**MUHAMMAD ILYAS** V/S **EDUCATION DEPTT:**

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Dated: \_\_\_\_\_ 12.2021

**APPELLANT**

Through:

**NOOR MOHAMMAD KHATTAK**  
**ADVOCATE**  
**0345-9383141**

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

SERVICE APPEAL NO. \_\_\_\_\_/2021

Mr, Muhammad Ilyas SST (BPS -16),  
GHS Kog Pand, District Mohmand

..... **APPELLANT**

**VERSUS**

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

..... **RESPONDENTS**

**APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED PROMOTION ORDER DATED 29-03-2019 WHEREBY THE APPELLANT HAS BEEN PROMOTED TO THE POST OF SST (BPS-16) WITH IMMEDIATE EFFECT AND NOT PROMOTING W-E-F 24-07-2014 I.E. W.E.F. THE DATE WHEN THE FIRST BATCH THEIR OTHER COLLEAGUES AT SETTLE SIDE WERE PROMOTED AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STIPULATED PERIOD OF NINETY DAYS**

**PRAYER:**

That on acceptance of this service appeal the impugned promotion order dated 29-03-2019 may very kindly be modified/ rectified to the extent that the appellant may kindly be granted ante dated promotion to the post of SST (BPS-16) with effect from 24-07-2014 with all back benefits including seniority in light of the judgment of this august Tribunal dated 14.7.2021 passed in appeal No.1266/2018. Any other remedy which this August Tribunal deems fit that may also be granted in favor of the appellant.

**R/SHEWETH:**  
**ON FACTS:**

***The appellant submits as under:***

- 1- That the appellant was initially appointed as PTC now PST (BPS-9) in the respondent department vide order dated 01.09.1999 Copy of the appointment order is attached as annexure ..... **A.**

- 2- That it is important to mention here that the respondents vide notification dated 13-11-2012 had notified service structure/ rules for promotion of the PST(s) and SST(s) to SS and other different disciplines. Copy of the notification dated 13-11-2012 is attached as annexure ..... **B.**
- 3- That the respondents vide notification dated 24-07-2014 promoted many teachers of the province working on settle side on the post of PST to the post of SST (BPS-16). That it is also worth to mention here that vide notification dated 1-11-2014 PSTs of the District Charsadda were promoted to the posts of SST (BPS-16) in light of notification dated 24-07-2014. Copy of the notification dated 1-11-2014 is attached as annexure ..... **C.**
- 4- That some of the colleagues of the appellant who were working in FATA were also promoted to the post of SST (BPS-16) but with immediate effect and from the date when his colleagues working on settle side were promoted i.e. w.e.f 24.7.2014. that feeling aggrieved the colleagues of the appellant knocked the door of this august Tribunal in appeal No.1266/2018 which was decide in favour of the appellant colleagues vide judgment dated 14.7.2021. Copies of the judgment are attached as annexure ..... **D.**
- 5- That the appellant was also promoted to the post SST (BPS-16) vide impugned notification dated 29-03-2019 with immediate effect and not w-e-f 1.11.2014 or 24-07-2014. Copy of the impugned notification dated 29-03-2019 is attached as annexure ..... **E.**
- 6- That appellant feeling aggrieved from the impugned notification dated 29-03-2019 and under the principle of consistency reported in 2009 SCMR page 1 preferred departmental appeal/ representation before the appellate authority but no response has been given within the stipulated period. Copy of the departmental appeal is attached as annexure ..... **F.**
- 7- That feeling aggrieved from the inaction of the respondents and having no other remedy the appellant preferred the instant appeal on following grounds inter alia.

**GROUND:**

- A- That the impugned promotion notification dated 29-03-2019 whereby promoting the appellant with immediate effect and not w-e-f 24-07-2014 is against law, facts, norms of natural justice and material on record hence liable to be rectified/ modified.
- B- That appellant has not been treated by the respondent department in accordance with law and rules on the subjected noted above and as such respondents violated the Article 4 and 25 of the Constitution of Islamic Republic of Pakistan.

- C- That the appellant has been discriminated by the respondents while issuing the impugned promotion notification dated 29-03-2019 whereby promoting the appellant with immediate effect and not w-e-f 24-07-2014.
- D- That under the principle of consistency reported in 2009 SCMR page No.1 the appellant is also similarly placed person and also entitled for equal treatment/relief.
- E- That the respondents acted in arbitrary and malafide manner by not granted ante dated promotion to the appellant w.e.f. 2014.
- F- That it is pertinent to mention here that the other similarly placed employees preferred service appeal No. 1266/2018, which was decided vide judgment dated 14-07-2021 whereby they were given promotion w-e-f the year 2014.
- G- That the respondents acted in arbitrary and mala fide manner while issuing the impugned notification.
- H- That the appellant seeks permission to advance other 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**

  
**MUHAMAD ILYAS**

**THROUGH:**  
**NOOR MUHAMMAD KHATTAK**

  
**KAMRAN KHAN**

  
**UMAR FAROOQ**

**&**   
**SAID KHAN**  
**ADVOCATES**

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

**SERVICE APPEAL NO. \_\_\_\_\_/2021**

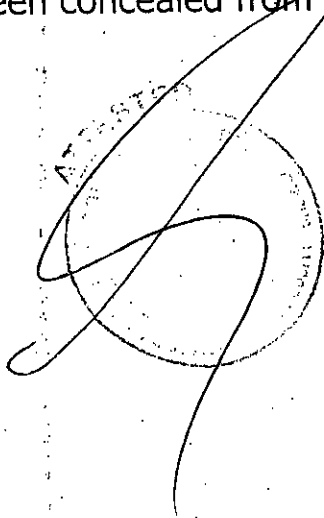
**MUHAMMAD ILYAS**

**VS**

**EDUCATION DEPTT:**

**AFFIDAVIT**

Stated on oath that the contents of the accompanying service appeal are correct to best of my knowledge and belief and nothing has been concealed from this Honorable Service Tribunal.



محمد ايلياس  
**DEPONENT**

**CERTIFICATE:**

Certify that no earlier service appeal has been filed by the appellant in the instant matter before this Honorable Service Tribunal.

  
**CERTIFICATION**



**POLITICAL DIRECTORATE OF EDUCATION (FATA) PESHAWAR.****APPOINTMENT:**

Consequent upon the approval of departmental selection committee the following (CT Trained) candidates are temporarily appointed/adjusted noted against their names; in BPS No. 9 on Rs. 1605/- and BPS No. 14 on Rs. 2065/- PM for those who are BA/BSC in 2<sup>nd</sup> division or on their own pay BPS, in cast of serving which ever is more beneficial to him plus usual allowances is under the rules, w.e.f. 01.09.1999.

| S.No                                    | Name/father's Name with address                                   | Posted at                         | Remarks                |
|---|---|-----------------------------------|------------------------|
| <b><i>KHYBER AGENCY OPEN MERIT.</i></b> |   |                                   |                        |
| 1.                                      | Illaud Din Msc/CT S/O Dawar Khan R/o Chanar Killi Khyber          | GHS, Landi Kotal Khyber           | Against vacant CT post |
| 2.                                      | Muhammiad Saddiq Msc/CT S/o Meen Akhar village Karegar, Khyber    | GHS, Qamar Khel Attari            | A/vacant of post       |
| 3.                                      | Rawaj Gul CT/S/o Khan Majeed Village & P.O Pandi Lalma Khyber     | GHS, Lora Miana Khyber            | -do-                   |
| 4.                                      | Muhammad Ali Shah BA/CT S/o Baghi Shah PTC, GHS, Sur Kamar Khyber | GMS Abdul Latif Khan Killi Khyber | -do-                   |
| 5.                                      | Akhair GUI BA/CT, S/o Hazrat Gul, R/o Aka KHel Bara               | GMS, Gul Zamir Killi Bara         | -do-                   |
| 6.                                      | Kamal Abdul Nasir FA/CT, S/o Sadullah PTC GHS, Landi Kotal.       | GHS, Landi Kotal Khyber           | -do-                   |
| 7.                                      | Jamshid Khan BA/CT, S/o Latif Khan R/o Khyber Agency              | GMS, Chappri Khyber               | -do-                   |
| 8.                                      | Nasir Shah FA/CT S/o Abdul manan (PTC) GHS Bara                   | GHS, Kam Shalman Khyber           | -do-                   |
| 9.                                      | Abdul Ghafoor FA/CT, S/o Bahadar Khan PTC, GHS, Akram Killi       | GHS, Sher Haider Khyber           | -do-                   |
| 10.                                     | Ikhtiar Shah BA/CT, S/o Zar Shah                                  | GHS, Landi Kotal Khyber           | -do-                   |
| 11.                                     | Gohar Rehman Afridi DAE/CT S/o Shahbaz Village Khyber Landi Kotal | GMS, Badshah Mir Killi            | -do-                   |
| 12.                                     | Waseem Khan MSC/CT, S/o Raza Khan Village Navi Abadi Jamrud       | GHS, GHundi Khyber                | -do-                   |
| 13.                                     | Sain Gul J/Clerk, S/o Raza Gul.                                   | GHS, Landi Kotal Khyber           | -do-                   |
| 14.                                     | Muhammad Ayub CT GHS, Same Ghari Bara                             | GHS Illamgudar                    | -do-                   |
| 15.                                     | Mukhtar Shah CT, GMS, Abdul Latif Killi Khyber.                   | GHS, Ghundi Khyber                | -do-                   |
| 16.                                     | Muhammad Ali CT GMS Badshah Mir, Khyber                           | GMS, Tar Khel Khyber              | -do-                   |
| 17.                                     | Now Sher Khan (Diable) CT GHS, Ghundi Khyber                      | GHS, Pandi Lalma                  | -do-                   |
| 18.                                     | Akhtar Hussain CT GHS Landi Kotal Khyber                          | GMS, Jabba Khyber                 | -do-                   |
| 19.                                     | Walayat Khan CT, GMS Jabba Khyber                                 | GHS, Jamrud No. 2                 | -do-                   |
| 20.                                     | Nawab Khan CT GHS Qamar Khel Attari Bara                          | GMS Sam Ghari Khyber              | -do-                   |

# ANNEXURE A (5)

## REGIONAL DIRECTORATE OF EDUCATION (FATA) PESHAWAR REGION, PUNJAB APPOINTMENT

Consequent upon the approval of Departmental Selection Committee the following (CT-Trained) candidates are temporarily appointed/Adjusted noted against their names:- in P.S. No. 9 on Rs. Rs.1605/- and P.S.No.14 on Rs.2065/- for those who are BA/BSC in 2nd Division or on their own Pay and P.S. in case of remaining pay which ever is more beneficial to them plus usual allowances as provided under the rules, w.e.f, 01.9.1999.

S.No. Name/ Father's Name with Address. Posted at. Remarks.

### KHYBER AGENCY OPEN MERIT.

- |  |   |   |
|--|---|---|
| 1. Ilaud Din MSc/CT S/O,<br>Dawar Khan R/O, Chanar Killi Khyber.             | GHS,<br>Landi Kotal (Khyber.              | A/vacant<br>post.                               |
| 2. Muhammad Saddiq MSc/CT S/O,<br>Meen ARBar Vill: Keregr, Khyber.           | GHS,<br>Gamar Khel Attari.                | V.S.No.25                                       |
| 3. Rawaj Gul BA/CT S/O, Khan Majed<br>Vill: & P.O, Pandi Lalma Khyber.       | GHS,<br>Lora Miana Khyber.                | V/Atta<br>Rahman, Promot<br>to SET<br>V.S.No.28 |
| 4. Muhammad Ali Shaha BA/CT S/O,<br>Baqi Shah PTC, GHS, Sur Kamar<br>Khyber. | GHS,<br>Abdul Latif Khan<br>Killi Khyber. | .....   |
| 5. Akheir Gul BA/CT, S/O,<br>Hazret Gul, R/O, Aka Khel Bara.                 | GHS,<br>Gul Zamir Killi Bara.             | V/Muham<br>Ali Promot<br>to SET                 |
| 6. Kamel Abdul Nasir BA/CT, S/O<br>Sadullah, PTC, GHS, Landi Kotal.          | GHS,<br>Landi Kotal.                      | Against<br>SV Post.<br>V/Hastan<br>Promot to    |
| 7. Jamshid Khan BA/CT, S/O,<br>Latif Khan R/O, Khyber. Agency.               | GHS,<br>Chappari Khyber.                  | A.V. CT<br>Post.                                |
| 8. Nasir Shah BA/CT, S/O,<br>Abdul Manan, PTC, R/O, Bara.                    | GHS,<br>Kan Shalman, Khyber.              | V/Danish<br>promoted to SV<br>A.V. CT post.     |
| 9. Abdul Ghafoor BA/CT, S/O,<br>Bahador Khan, PTC, GHS, Akram Killi.         | GHS,<br>Sher Hoider Khyber.               | V.S.No.17                                       |
| 10. Ikhitar Shah BA/CT, S/O,<br>Zor Shah.                                    | GHS,<br>Landi Kotal Khyber.               | V/Zia<br>Promot;                                |
| 11. Gohar Rehman Afridi DAE/CT S/O,<br>Shahbaz Vill: Khyber Landi Kotal.     | GHS,<br>Baccheh Mir Killi.                | V.S.No.17                                       |
| 12. Vaseem Khan MSc/CT, S/O,<br>Raza Khan Vill: Mavi Abdi Jamrud.            | GHS,<br>Chundi Khyber.                    | V/Said<br>Promot;                               |
| 13. Saif Gul J. Clerk, R/O,<br>Raza Gul.                                     | GHS,<br>Landi Kotal. Khyber.              | V.S.No.17                                       |
| 14. Muhammad Ayub CT,<br>GHS, (Sema Gheri Bara).                             | GHS,<br>Illangudar.                       | V/Zainullah promot<br>to SET.                   |
| 15. Mukhtar Shah CT, GHS,<br>Abdul Latif Killi Khyber.                       | GHS,<br>Chundi Khyber.                    | V.S.No.17                                       |
| 16. Muhammad Ali CT, GHS,<br>Badshah Mir, Khyber.                            | GHS,<br>Tar Khel Khyber.                  | V/Said Jalal<br>to SET Post.                    |
| 17. Now Sher Khan (Disable) CT,<br>GHS, Chundi Khyber.                       | GHS,<br>Pandi Lalma.                      | V/Fida Muhammad<br>Promot: to SET post.         |
| 18. Akhtar Hussain CT, GHS,<br>Landi Kotal Khyber.                           | GHS,<br>Jabba Khyber.                     | V.S.No.17                                       |
| 19. Malayat Khan CT, GHS,<br>Jabba Khyber.                                   | GHS,<br>Jamrud No.2.                      | Against<br>CT. post.                            |
| 20. Nawab Khan CT, GHS,<br>Gamar Khel Attari Bara.                           | GHS,<br>Sema Gheri Khyber.                | V.S.No.14                                       |

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| <b>PESHAWAR OPEN MERIT</b> |  |                                    |                                   |
|----------------------------|--|------------------------------------|-----------------------------------|
| 21.                        | Awal Mat Khan CT S/o Umat Khian Village Mandi jan Kor FR< Peshawar                     | GMS Pastwani FR Peshawar           | V/Khail Most Promt" to SET        |
| 22.                        | Mukkaram Khan BA/CT, PTC. GPS, Sher Dil Killi  | GHS, Kohi Hassan Khel FR, Peshawar | Against vacant CT post.           |
| <b>BATCH WISE</b>          |  |                                    |                                   |
| 23.                        | Muhammad Zaman BA/CT, S/o Roshan Khan PTC, GPS, Murid Khan FR, Peshawar                | GMS, Pastawani, FR Peshawar        | A/V SV post                       |
| 24.                        | Mr. Janat Mir FA/CT S/o Khawas Khan C/o GMS Aziz ur Rehman                             | GMS, Samabdahber FR, Peshawar      | V.S No. 29                        |
| 25.                        | Asal Muhammad PTC BA/CT S/o Abdul Samad C/GPS, Afzal Khel FR, Peshawar                 | GHS, Knsdow FR Peshawar            | A/V CT Post                       |
| 26.                        | Said hakim PTC BA/ST, S/o Rabaz Khanb GHS, Musa FR Peshawar                            | GMS Musa Darre FR Peshawar         | V.S No. 27                        |
| <b>TRANSFER</b>            |  |                                    |                                   |
| 27.                        | Hussain Zaman CT, GHS, Musa Darra FR, Peshawar   | GHS, Juma Kor FR Peshawar          | A/V C.T Post                      |
| 28.                        | Khan Hussan CT, GHS Kohi Hassan Khel FR, Peshawar                                      | GHS, Kando FR Peshawar             | -do-                              |
| 29.                        | Abdul Waheed CT, GHS, Sama Badabero FR Peshawar  | GHS, Kohi Hassan khel FR Peshawar  | V/S No. 28                        |
| <b>MOHMAND OPEN MERIT</b>  |  |                                    |                                   |
| 30.                        | Said Wali MSC/CT S/o Madar Sha h Koh: Dhand Koroona Saeed Abad Kus, Mardan             | GMS Kuz Kadi Mohmand               | V/S No. 39                        |
| 31.                        | Muhammad Ilyas SSC/CT S/o Kamal Shah R/o Rajoura Killi Tehsil Tangi District Charsadda | GHS, Dab Kor Mohmand               | A/V CT Post.                      |
| 32.                        | Aleem Khan PTC BA/CT, S/o Dawa Khan GPS, Kal Darra Mohmand                             | GMS Chazi Bag Mohmand              | Vice Hamid Ullah                  |
| <b>BATCHWISE</b>           |  |                                    |                                   |
| 33.                        | Hazrat Mula BSc/CT S/o Gulab Village Multan Khal Mohmand                               | GMS, Nahaqi Mohmand                | -do-                              |
| 34.                        | Qariullah MSC/CT S/o mosa Khan District Mardan   | GMS, Mashia Kor Mohmand            | -do-                              |
| 35.                        | Usman Khan BA/CT S/o Durrai Khan Village Malik Alam Kor yousaf Khan Mohmand            | GMS, Ghazi Bag Mohmand             | -do-                              |
| 36.                        | Muhammad Israr Fsc/CT S/o Aman Ullah Village Kasali                                    | GMS, Khatti Bharif Mohmand         | -do-                              |
| 37.                        | Khurshid Alam PTC, MA/CT S/o Wahab Gul Vill: Aka Khel P.O Mathra                       | GMS, Habib Zai Mohmand             | -do-                              |
| 38.                        | Inayat Ur Rehman MA/CT S/o Mukkaram Khan Vill: Shamilat, Tehsil P.O Sher Garh, Mardan  | GMS, Abdul Baki Mohmand            | -do-                              |
| <b>TRANSFER</b>            |  |                                    |                                   |
| 39.                        | Muhammad Nisar CT, GMS Kuz Khadi,  | GMS, Subhan Khawar Mohmand         | V/Akhtar Ali CT Promt to SET Post |

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- 21. Awal Mat Khan CT S/O  
Umst Khan Vill: Mandi, Jan Kor  
FR: Peshwar. GMS, Pastawani FR: Pesh: V/Kheil Mast  
Front: t...
- 22. Mukkaram Khan BA/CT, PTC  
GPS, Sher Dil Killi, GMS, Kohi Hassan Khel. Against vacant  
FR: Peshawar. CT. post.
- 23. Muhammad Zaman BA/CT, S/O,  
Roshan Khan PTC; GPS, Farid Khel Pastawani. FR: Pesh: A/V, SV post.
- 24. Janat Mir FA/CT S/O  
Khawas Khan C/O, GMS, Aziz-  
Ur Rehman. GMS, Sambodaber FR: Pesh: V.S.No.29.
- 25. Asad Muhammad PTC, BA/CT, S/O, GMS,  
Abdul Samad C/O, GMS, Afzal Khel Knadow FR: Pesh: A/V, CT. post.
- 26. Said Hakim PTC, BA/T, S/O, GMS,  
Rabaz Khan GMS, Musa FR: Pesh: Musa Darra FR: Pesh: V.S.No.27
- 27. Hassan Zaman CT, GMS,  
Musa Darra FR: Pesh: GMS, Juma Kor FR: Pesh: A/V, CT Post.
- 28. Khan Hassan CT, GMS,  
Kohi Hassan Khel FR: Pesh: GMS, Kandow FR: Pesh: ...do....
- 29. Abdul Saeed CT, GMS,  
Sambodaber FR: Pesh: GMS, Kohi Hassan Khel FR: Pesh: V.S.No.28.
- 30. Said... MSC/CT S/O  
Madar... Dhand, Korona. GMS, Kuz Kadi Mohmand. V/S.No.39.
- 31. Saad... Kus, Mardan. GMS, Kuz Kor Mohmand. A/V, CT. Post.
- 32. Muhammad Aliyaz... Killi,  
Teh: Mageri Dist: Charsadda. GMS, Rawal Kot Mohmand. ...do...
- 33. Hozrat Mulla... S/O  
Gulab... Mohmand. GMS, Nohagi Mohmand. ...do....
- 34. Gazi... Dist: Mardan. GMS, Hashia Kor, Mohmand. ...do....
- 35. Usman... Vill: Moll, Alam  
Kor Youser Khan Mohmand. GMS, Chazi Bog Mohmand. ...do....
- 36. Muhammad Faraz... S/O  
Amir Ullah Vill: Kozai Kor  
Mohmand. GMS, Kh. tti Sherif, Mohmand. ...do....
- 37. Khureshid Alam PTC, BA/CT, S/O,  
Wahab Gul Vill: Khe Khel P.O.  
Methra. GMS, Habib Zai Mohmand. ...do....
- 38. Inayat Ur Rehman M. CT S/O,  
Mukkaram Khan Vill: Shamilat,  
Teh P.O, Sher Garh, Mardan. GMS, Abdul Baki Mohmand. ...do....
- 39. Muhammad Nisar CT, GMS,  
Kuz Kadi, Mohmand. GMS, Suban Kheger, Mohmand. V/... Ali CT pront:  
to SMT post.

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Alkhtar  
to SMT post.

|                   |  |                            |                            |
|-------------------|--|----------------------------|----------------------------|
| 40.               | Abdul Aziz MA/SC Bazar Jambir<br>Vill: Shamoza Charsadda                                     | GHS, Zoor Banda<br>Bajour  | Against the<br>vacant post |
| 41.               | Lov dari MA/CT, S/C Amin Jan<br>PTC, GPS, Man KOt bajour                                     | GPS, Chamar Kand<br>Bajour | -do-                       |
| <b>BATCH WISE</b> |  |                            |                            |
| 42.               | Khan Zarin MA/CT, S/o Faqir<br>Vill: Khugh P.O Raghaghon<br>Bajour.                          | GMS, Gard Bajour           | Against the<br>vacant post |
| 43.               | Lal Zada BA/CT S/o Bagh<br>Muhammad Vill: bagh Gram<br>Sharoza Bajour                        | GMS, Gard Bajour           | Against the<br>vacant post |
| 44.               | Rahim Jan BA/CT S/o Amir<br>Muhammad Vil: Mir Alam, Miaz:<br>Tehsil Tangi District Charsadda | GMS, Datwar bajour         | Against the<br>vacant post |
| 45.               | Fazal Ahmed BA/CT/Agro Tech<br>S/O Khushmir Vill: utman khel,<br>Bajour                      | GMS, Datwar bajour         | Against the<br>vacant post |
| 46.               | Ihsan Ul Haq S/o Rohul Haq Diad<br>in service BA CT Tech: Khar<br>Navegai bajour             | GMS, Datwar bajour         | Against the<br>vacant post |
| 47.               | Zahir Akbar CT, GMS Batwar<br>Bajour   | GMS, Datwar bajour         | Against the<br>vacant post |

## Terms and conditions:

1. Charge report should be submitted in duplicate to all concerned.
2. The appointment of the candidates are being made purely on temporary basis and are liable to termination at any time without prior notice or forfeit one month to the government in lieu thereof
3. Their original academic certificates, date of birth, doemicile certificates, and MMC should be shekced averified from the concerned. Other visito air pay should not be drawn D.D.G is responsible for the sumn.
4. They should be sent to the agency surget, medical Supdt: concern for medical examination the day on which tey reported their arrival for duty. No pay should be drawn for them unless and until they produced their Helath and age certificate.
5. Their pay scle and services rules would be subject to the revision in the accordance with the orders should be passed by the government of NWFP time to time.
6. They should not be handed over charge of the post if they are below 18 years, or above 33 years in case of fresh appointment.
7. If any one file to temporary his arrival with in 7 days after 01.09.1999 a report to this effect should be sent to the Director to ATC
8. No TA/DA etc is allowed.

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CONTINUED ON PAGE NO. 2

INSTRUCTIONS FOR THE ...

Regional Agency  
Director, Education  
Region Bishnupur

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1. Director of Education (P.T.M.) B.P. Bishnupur  
2. Agency Education Officer, Khyber / Helmand / Bajaur Agency  
3. Agency Accounts Officer, B.P. Bishnupur / Helmand / Bajaur  
4. Principals / Head Master, of the concerned schools.  
57.103: Candidates concerned.  
107. Personal files.

Copy of the above is furnished for information and necessary action to the:  
C. L. I. S. G. M. D. 4  
125-2328  
Date received: 2/1/72

8

**GOVERNMENT: OF THE KHYBER PAKHTUNKHWA ELEMENTARY AND  
EDUCATION DEPARTMENT**

**NOTIFICATION**

**Peshawar dated the November 13.2012**

**No,SO PE H-5 SSRC/Meeting /2012 Teaching Cadre:-** In Pursuance of the provision contained in sub-rule (20 of rule 3 of the Pkhyber Pakhtunkhwa Civil Servant (Appointment Promotion and Transfer) Rules 1989 and in superssion of all Notification issued in this behalf, the Elementary And Secondary Education Department in consultation with the Establishment Department and the Finance Department hereby days down the method of recruitment definition and other condition-specified in the Appendix to this Notification which shall be applicable to all the posts specified in Column No, 02 of the said Appendix and the schedule therewith.

**SECRETARY TO GOVERNMENT: OF THE KHYBER PAKHTUNKHWA  
ELEMENTARY AND EDUCATION DEPARTMENT**

Endst: No. & date as above.

Copy forwarding :-

1. The Secretary to Govt: of Khyber Pakhtunkhwa Establishment Department .
2. The Secretary to Govt: of Khyber Pakhtunkhwa Finance Department .
3. The Secretary to Govt: of Khyber Pakhtunkhwa Law/ Department .
4. The Secretary Khyber Pakhtunkhwa Public Service Commission Peshawar .
5. The Account General Khyber Pakhtunkhwa Peshawar .
6. The Director (E&SE) Khyber Pakhtunkhwa Peshawar .
7. The Director Education (FATA) Peshawar .



GOVERNMENT OF THE KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

Handwritten signature in Urdu script at the top right of the page.

NOTIFICATION

Peshawar, dated the November 13, 2012.

No. SO/PE/14-5/SSRC/Meeting/2012/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 and in supersession of all Notifications issued in this behalf, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department hereby lays down the method of recruitment and other conditions specified in the Appendix to this Notification which shall be applicable to all the posts specified in Column No. 2 of the said Appendix and the schedule therewith.

SECRETARY TO GOVERNMENT OF THE KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

Order No. & Date as above.

Forwarded to:-

1. The Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department.
2. The Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department.
3. The Secretary to Govt. of Khyber Pakhtunkhwa, Law Department.
4. The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.
5. The Accountant General, Khyber Pakhtunkhwa Peshawar.
6. The Director (E&SE) Khyber Pakhtunkhwa Peshawar.
7. The Director Education (FATA) Peshawar.

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Handwritten signature in Urdu script, possibly reading "(APTA) ..."

Handwritten number: 03159159555

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ANNEXURE B

9

8. The Director Curriculum & Teachers Education Abbottabad.
9. The Director (PITE) Khyber Pakhtunkhwa Peshawar.
10. The Deputy Director Database (EMIS) E & SE Department.
16. P.S to Governor Khyber Pakhtunkhwa
17. P.S to Chief Minister Khyber Pakhtunkhwa
18. P.S to Chief Secretary Khyber Pakhtunkhwa
19. P.S to Secretary E & SE Department.
21. Master file.

1. The Director Curriculum & Teachers Education-Abbottabad.
2. The Director (PTE) Khyber Pakhtunkhwa Peshawar.
3. The Director ESRU, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
4. The Director Database (EIS) E&SE Department.
5. The Deputy Director Officers in Khyber Pakhtunkhwa.
6. All District Coordination Officers Elementary & Secondary Education in Khyber Pakhtunkhwa.
7. All Executive District Officers Elementary & Secondary Education in Khyber Pakhtunkhwa /Agency Accounts Officers FATA.
8. All District Accounts Officers in Khyber Pakhtunkhwa FATA.
9. All Agency Education Officers FATA.
10. P.S to Governor, Khyber Pakhtunkhwa.
11. P.S to Chief Minister, Khyber Pakhtunkhwa.
12. P.S to Chief Secretary, Khyber Pakhtunkhwa.
13. P.S to Minister E&SE Khyber Pakhtunkhwa Peshawar.
14. P.S to Secretary E&SE Department.
15. Master File.

Section Officer (Primary)

*(Handwritten initials)*

Attended

10

ANNEX C

DISTRICT EDUCATION OFFICER

MALE CHARSADE

## NOTIFICATION:

Consequent upon the recommendations of the departmental promotion committee and in pursuance of the government of the Khyber Pakhtunkhwa a Elementary and secondary Education notification No. SO(SE) /4-8/SSRC/Meeting/2013/teaching Cadre dated 24<sup>th</sup> July 2014 and notification No. 3376-80/file Education Khyber Pakhtunkhwa, Peshawar, the following SCTs/CTs SDMs/DMs, SATs/ATs, STTs/TTs Senior Qaris, PSHTs/SPSTs are hereby promoted to the post of SST (Bio-Chem) SST (Phy-Maths) SST (General) noted against each BPS-16 (Rs. 10000-800-34000) 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 posted in the schools noted against each;

**SST (Bio Chem)**

| S.No | Name of teacher & Designation | Present Place of posting | Place of posting.     |
|------|-------------------------------|--------------------------|-----------------------|
| 1.   | Mazhar Ul Islami (SCT)        | GMSS Utmanzai            | GHS Utmanzai No. 2    |
| 2.   | Riasat Ali (SCT)              | GHS Zarbab Gharhi        | GHSS Sherpao          |
| 3.   | Iftikhar Ahmad (SCT)          | GHS Rajjar No. 1         | GHSS Nisatta          |
| 4.   | Jamshaid Khan (SCT)           | GHS Zubrab Gul           | GHS Gulkhatab Koroona |
| 5.   | Maqsood Jan (CT)              | GHSS Utmanzai            | GHS Turangzai         |
| 6.   | Hayat Jan (CT)                | GHS Utmanzai             | GHSS Tarnab           |
| 7.   | Inayat ur Rehman (CT)         | GHSS Utmanzai            | GPS                   |
| 8.   | Nasrullah Khan (CT)           | GMS Dhaki                | GMS Tangi No. 2       |
| 9.   | Jamshaid Khan (CT)            | GMS Abazaj               | GHS Charsadda Khass   |
| 10.  | Idrees Khan (CT)              | GMS Dab Banda            | GHS Shara Shabqadar   |
| 11.  | Muhammad Said (CT)            | GHS Rahmatullah          | GHS Halim zai         |
| 12.  | Abdullah Jan (SPST)           | GPS Munshaiaino Kali     | GHSS Bushera          |
| 13.  | Tariq Hussain (SPST)          | GPS haryan               | GHS Mera Gul Abad     |
| 14.  | Muhammad Akram (SPST)         | GPS Inam Killi           | GHS Mardhand          |
| 15.  | Taj Ullah (SPST)              | GPS Shakoor              | GHS Katozai           |
| 16.  | Zikarullah Jan (SPST)         | GPS Hajizai              | GHS Kangra            |
| 17.  | Arab Jan (SPST)               | GPS Baz Mian Killi       | GMS Khas Killi        |
| 18.  | Shehriyar (DM)                | GHSS Sati Abari          |                       |

**B. SST (Phy-Maths)**

| S.No | Name of teacher & Designation | Present Place of posting      | Place of posting.             |
|------|-------------------------------|-------------------------------|-------------------------------|
| 1.   | Mahboob Ul Hassan (SC)        | GHS Rahmat Ullah Khan Koroona | GHS Rahmat Ullah Khan Koroona |
| 2.   | Fazli Wahab (SCT)             | GHS Soor Kama                 | GHS Mardhana                  |
| 3.   | Nawab (SCT)                   | GMS Mufti Abad Muhammad Nari  | GHS Wardaga                   |
| 4.   | Shakir Ullah (SCT)            | GHS Ghari Handa Gul           | GHS Geedar                    |
| 5.   | Habib ur Rehman (SCT)         | GMS Ghari Handa Gul           | GHS Parang                    |



DISTRICT EDUCATION OFFICER  
MAHF CHARSAJDA

## Notification

Consequent upon the recommendations of the Departmental Promotion Committee in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.50 (P8)/4-5/SSRC/Meeting/2013/Teaching Cadre dated 24<sup>th</sup> July 2014 and Notification No 3376-80/8 No.2/Promotion-5T B-16 Dated Peshawar the 23-10-2014 issued by the Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar, the following SGTs/CTs, SDMs/DMs, SATs/ACTs, STTs/ Senior Class/Quis, PSHTs/ SPSTs are hereby promoted to the post of SST(Bio-Chem), SST (Phy-Mat) SST(General) noted against each BPS-16 (Rs.10000-800-34000) plus usual allowances as admissible under rules on regular basis under the existing policy of the Provincial Government, on the terms and conditions given below with immediate effect and further posted in the Schools noted against each:

### A. SST (Bio-Chem)

| S.No | Name of Teacher & Designation | Present Place of Posting | Place of Posting     |
|------|-------------------------------|--------------------------|----------------------|
| 15   | Mazhar - Ul - Islam (SCT)     | GHS Ummanzai             | GHS Ummanzai No 2    |
| 93   | Riasat Ali (SCT)              | GHS Zarbab Garhi         | GHS Sherana          |
| 112  | Iftikhar Ahmad (SCT)          | GHS Rajar No 1           | GHS Nuatta           |
| 183  | Jamshaid Khan (SCT)           | GHS Zuhrah Garhi         | GHS Gujratul Koroona |
| 190  | Maqsood Jan (CT)              | GHS Ummanzai             | GHS Turangan         |
| 237  | Hayat Jan (CT)                | GHS Ummanzai No 2        | GHS Tarnan           |
| 245  | Inayat Ur Rehman (CT)         | GHS Ummanzai             | GHS Ummanzai         |
| 282  | Nasrullah Khan (CT)           | GMS Daakki               | GHS Hajizai          |
| 323  | Jamshaid Khan (CT)            | GHS Abazai               | GHS Tangi No.2       |
| 341  | Iqrees Khan (CT)              | GMS Dab Banda            | GHS Charsajda Khass  |
| 360  | Muhammad Said (CT)            | CHS Rahayatullah         | GHS Shara Shabqadar  |
| 1087 | Abdallah Jan (SPST)           | GPS Munshiano Kili       | GHS Halim zai        |
| 1454 | Tariq Hussain (SPST)          | GPS Harjan, No 1         | GHS Peshera          |
| 1454 | Muhammad Akram (SPST)         | GPS Inam Kili            | GHS Mera Gul Abad    |
| 1459 | Taj Ullah (SPST)              | GHS Shakoor              | GHS Mardhand         |
| 1474 | Zikarullah Jan (SPST)         | GPS Hajizai              | GHS Katozai          |
| 153  | Arab Jan (SPST)               | GPS Baz Mian Kili        | GHS Kangra           |
| 1534 | Shchriyar (DM)                | GHS Sag Abad             | GHS Khat Khat        |

### B. SST (Phy-Maths)

| S.No | Name of Teacher & Designation | Present Place of Posting          | Place of Posting              |
|------|-------------------------------|-----------------------------------|-------------------------------|
| 1    | Mahboob Ul Hassan (SC)        | GHS Rahmat Ullah Khan Koroona     | GHS Rahmat Ullah Khan Koroona |
| 2    | Fazli Wahab (SCT)             | GHS Soor Kama                     | GHS Maruhani                  |
| 3    | Nawab (SCT)                   | GMS Mufti Abad, GHS Muhammad Nari | GHS Wardaga                   |
| 4    | Shakir Ullah (SCT)            | GHS Chari Hamid Gul               | GHS Geedar                    |
| 5    | Habib Ur Rehman (SCT)         | GHS Chari Hamid Gul               | GHS Parang                    |

|     |                        |                     |                                   |
|-----|------------------------|---------------------|-----------------------------------|
| 6.  | Imtiaz Ali (SCT)       | GHS Ghari Hamid Gul | GHS Rajjar No. 1                  |
| 7.  | Masal Khan (SCT)       | GHSS Dargai Manga   | GHS Dargai Mangai                 |
| 8.  | Syed Sabaz Ali (SCT)   | GHSS Dhakki         | GHS Gazgi                         |
| 9.  | Basharat Ahmad (SCT)   | GHS Charsadda No. 1 | GHS Shakardhand                   |
| 10. | Ijaz Ali Khan (CT)     | GHS Harichand       | GHS Mirzadher                     |
| 11. | Sajid Ali Shah (CT)    | GMS Marchaki Rajjar | GHS Turangzai                     |
| 12. | Khial Badshah (CT)     | GHS Tangi No. 2     | GHS Abazai                        |
| 13. | Shakir Rehman (CT)     | GHS Charsadda No. 1 | GHS Rajjar No. 2                  |
| 14. | Sareer Ahmad (CT)      | GHSS Sherpao        | GHS Gandheri                      |
| 15. | Zahid Shah (CT)        | GHS Shodag          | GHS Kharaki                       |
| 16. | Shahid Jamal (SPST)    | GPS Dosehra         | GHS Turlandi                      |
| 17. | Salar Fathuddin (SPST) | GPS Marozai         | GHS Khawaja<br>Hawas              |
| 18. | Irshad Ali (SPST)      | GPS Ziam            | GHS Mani Khela                    |
| 19. | Siraj Ahmad (SPST)     | GPS Shahdhand       | GHS Mirzai                        |
| 20. | Aftab Hussain (SPST)   | GPS Umarzai No. 2   | GHS Gul Khtiab<br>Koroona Umerzai |
| 21. | Samin GUL (SPST)       | GPS Angar Koroona   | GHS Behlola                       |
| 22. | Sajid Ali (SPST)       | GPS Rajjar No. 2    | GHS Zahid Abad                    |
| 23. | Muhamamd Younas (DM)   | GHSS Umarzai        | GHS Khuladhand                    |
| 24. | Kamran (DM)            | GHS Hajizai         | GHS sSoro Killi                   |
| 25. | Aleem Ullah (AT)       | GHS Hajizai         | GHS Shara                         |
| 26. | Akram Khan (TT)        | GHSS Sherpan        | GHS Zarab Ghari                   |
| 27. | Asmat Ali (S Qari)     | GGMHS Turangzai     | GHS Cheena                        |

### **C. SST (General)**

| S.No | Name of teacher & Designation | Present Place of posting      | Place of posting.                 |
|------|-------------------------------|-------------------------------|-----------------------------------|
| 1.   | Muhammad Ishaq (SCT)          | GHS Rahmat Ullah Khan Koroona | GHS Rahmat Ullah Khan Koroona     |
| 2.   | Muhammad Afzal (SCT)          | GHS Soo: Kama                 | GHS Mardhana                      |
| 3.   | Inam Ullah (SCT)              | GMS Mufti Abad Muhammad Nari  | GHS Wardaga                       |
| 4.   | Durus Salam (SCT)             | GHS Ghari Handa GUL           | GHS Geedar                        |
| 5.   | Sultan Shah (SCT)             | GMS Ghari Handa Gul           | GHS Parang                        |
| 6.   | Sareer Ahmad (CT)             | GHSS Sherpao                  | GHS Gandheri                      |
| 7.   | Zahid Shah (CT)               | GHS Shodag                    | GHS Kharaki                       |
| 8.   | Shahid Jamal (SPST)           | GPS Dosehra                   | GHS Turlandi                      |
| 9.   | Salar Fathuddin (SPST)        | GPS Marozai                   | GHS Khawaja<br>Hawas              |
| 10.  | Irshad Ali (SPST)             | GPS Ziam                      | GHS Mani Khela                    |
| 11.  | Siraj Ahmad (SPST)            | GPS Shahdhand                 | GHS Mirzai                        |
| 12.  | Aftab Hussain (SPST)          | GPS Umarzai No. 2             | GHS Gul Khtiab<br>Koroona Umerzai |
| 13.  | Samin GUL (SPST)              | GPS Angar Koroona             | GHS Behlola                       |
| 14.  | Sajid Ali (SPST)              | GPS Rajjar No. 2              | GHS Zahid Abad                    |
| 15.  | Muhamamd Younas (DM)          | GHSS Umarzai                  | GHS Khuladhand                    |
| 16.  | Kamran (DM)                   | GHS Hajizai                   | GHS sSoro Killi                   |
| 17.  | Aleem Ullah (AT)              | GHS Hajizai                   | GHS Shara                         |
| 18.  | Akram Khan (TT)               | GHSS Sherpan                  | GHS Zarab Ghari                   |
| 19.  | Asmat Ali (S Qari)            | GGMHS Turangzai               | GHS Cheena                        |

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|    |      |                        |                      |                        |
|----|------|------------------------|----------------------|------------------------|
| 7  | 121  | Imtiaz Ali (SCT)       | CHS Chahri Hamid Gul | CHS Rajjar No.1        |
| 8  | 182  | Masud Khan (SCT)       | CHSS Dargai Manga    | CHS Dargai Manga       |
| 9  | 210  | Syed Sabaz Ali (SCT)   | CHSS Dhakki          | CHS Chazgi             |
| 10 | 225  | Basharat Ahmad (SCT)   | CHS Charsadda No.1   | CHS Shakardhand        |
| 11 | 259  | Huz Ali Khan (CT)      | GHS Harichand        | CHS Mirzadher          |
| 12 | 266  | Sajid Ali Shah (CT)    | CMS Marchaki Rajjar  | CHS Turangzai          |
| 13 | 330  | Khial Badshah (CT)     | CHS Tangi No.2       | GHS Abazai             |
| 14 | 347  | Shakir Rehman (CT)     | CHS Charsadda No.1   | CHS Rajjar No.2        |
| 15 | 352  | Sareer Ahmad (CT)      | GHSS Sherpao         | CHS Gandheri           |
| 16 | 782  | Zahid Shah (CT)        | CHS Shodag           | CHS Kharaki            |
| 17 | 907  | Shahid Jamal (SPST)    | CPS Dosehra          | CHS Turlandi           |
| 18 | 1076 | Salar Fathuddin (SPST) | CPS Marozai          | CHS Khwaja Hawas       |
| 19 | 1089 | Irshad Ali (SPST)      | CPS Ziam             | CHS Mani Khela         |
| 20 | 1090 | Siraj Ahmad (SPST)     | CPS Shahdhand        | CHS Mirzai             |
| 21 | 1167 | Aftab Hussain (SPST)   | CPS Umarzai No.2     | CHS Gul Khitab Korooni |
| 22 | 1168 | Samin Gul (SPST)       | CPS Angar Korooni    | CHS Umerzai            |
| 23 | 84   | Sajid Ali (SPST)       | GHSS Umarzai         | CHS Behloia            |
| 24 | 113  | Muhammad Younas (DM)   | CHS Hajizai          | CHS Zahid Abad         |
| 25 | 97   | Kamran (DM)            | CHS Hajizai          | CHS Khuladhand         |
| 26 | 81   | Aleem Ullah (AT)       | GHSS Sherpao         | CHS Soro Killi         |
| 27 | 42   | Akram Khan (IT)        | GCMHS Turangzai      | CHS Shara              |
|    |      | Asmat Ali (SQari)      |                      | CHS Zarab Chari        |
|    |      |                        |                      | CHS Cheena             |

### C.SST (General)

| S.No | Name of Teacher & Designation | Present Place of Posting           | Place of Posting   |
|------|-------------------------------|------------------------------------|--------------------|
| 1    | Muhammad Ishaq (SCT)          | CHS Mera Gul Abad                  | CHS Mera Gul Abad  |
| 2    | Muhammad Afzal (SCT)          | CHS Cheena                         | CHS Rajjar - 1     |
| 3    | Inam Ullah (SCT)              | CHS Sherpao                        | CHS Turangzai      |
| 4    | Durus Salam (SCT)             | CHS Ambadher                       | CHS SKF Dalazak    |
| 5    | Sultan Shah (SCT)             | CHS Shakardhand                    | CHS Shakardhand    |
| 6    | Muhammad Iqbal (SCT)          | CHS Kangra                         | CHS Katozai        |
| 7    | Rifaqat Ullah (SCT)           | CMS Dheri Chazgi                   | CHS Rajjar - 1     |
| 8    | Wahid Ali (SCT)               | CMS Dheri Chazgi / CCMHS Turangzai | CHS Chazgi         |
| 9    | Zahid Ullah (SCT)             | CHS Shakardhand                    | CHS Dargai Manga   |
| 10   | Muhammad Islam (SCT)          | CHS Mani Khela                     | CHS Mani Khela     |
| 11   | Abdur Basir (SCT)             | CMS Sherpao                        | CHS Gul Abad Tangi |
| 12   | Muhammad Saeed Khan (SCT)     | CHS Mirzadher                      | GHSS Tarnab        |
| 13   | Muhammad Israr (SCT)          | CMS Islamabad No.2                 | CHSS Dosehra       |
| 14   | Muhammad Qasim Jan (SCT)      | CHS Charsadda No.1                 | GHSS Nisatta       |
| 15   | Maz Ullah Khan (SCT)          | CMS Zarin Abad                     | CMS Zarinabad      |
| 16   | Niamat Ullah (SCT)            | CMS Nawan Killi                    | CMS Kot            |
| 17   | Nizar Ud Din (SCT)            | CHS Parang                         | CHS Rajjar - 2     |
| 18   | Pervez Shah (PSHT)            | CPS Sheikh Killi                   | CHSS Nisatta       |
| 19   | Zahir Ullah (PSHT)            | CPS Khuladhand                     | CHS Babara         |

|    |     |                             |                         |                         |
|----|-----|-----------------------------|-------------------------|-------------------------|
| 20 | 121 | Atta Ur Rahman (PSHT)       | GPS Bosa Khel No.1      | CHSS No.1 Charsadda     |
| 21 | 168 | Halim Khan (PSHT)           | GPS Bachayano Killi     | CHS Abazai              |
| 22 | 169 | Ali Muhammad (PSHT)         | GPS Qatray              | CHSS Doshera            |
| 23 | 186 | Muhammad Rafi (PSHT)        | GPS Dagi Faizullah Khan | CHS Dheri Sikandar Khan |
| 24 | 190 | Waheed Ullah (PSHT)         | GPS Shabqadar Fort No.2 | CHS Dheri Sikandar Khan |
| 25 | 276 | Hanif Ullah (PSHT)          | GPS Bakayana            | CHS Ambadher            |
| 26 | 14  | Yaqoob Jan (SDM)            | CHS Utmanzai No.2       | CHSS Utmanzai           |
| 27 | 4   | Wahid Ullah Jan (STT)       | CHS Rashaki             | CHS Rashaki             |
| 28 | 43  | Hafiz Ullah (STT)           | CHS Charsadda Khas.     | CHS Ceedar              |
| 30 | 02  | Muhammad Nasrul Qaddus (TT) | CHS Soro Khamar         | CHS Mardhand            |
| 31 | 24  | Muhammad Tayyab (TT)        | CHS Soro Killi          | CHS Soro Killi          |
| 32 | 10  | Qari Mohsin Ullah (SQari)   | CHS Tangi No.2          | CHS Sadar Chari         |

**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 Government.
3. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their Interservice Seniority on lower post will remain intact.
6. No P.A./L.A. 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 promotion is made to them in light of this order, will be recovered and if they are wrongly promoted, they will be reversed.
8. They will be governed by such rules and regulations as may be issued from time to time by the Government.
9. Their posting will be made on School Based, they will have to serve at the place of posting, and service is not transferrable to any other station.
10. Before handing over charge once again their documents may be checked if they have not the relevant qualification as per rules, they may not be handed over charge of the post.
11. Their BA/BSc and B.Ed degrees and DMCs will be verified by the concerned DDO.

(Siraj Muhammad)  
District Education Officer  
Male Charsadda

Endst No. 10910-92 Promotion SST B-16: Dated Charsadda the 1/11/2014.

Copy forwarded for information and necessary action to the:-

1. Director F&SE Khyber Pakhtunkhwa.
2. P.A. to Secretary E&SE Khyber Pakhtunkhwa.
3. Principal/Head Master Concerned.
4. District Account Officer Charsadda.
5. All Officers Concerned.
6. M/ File.

*(Signature)*  
Attended

District Education Officer  
Male Charsadda

*(Signature)*



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR.



S.A.No. 1265/2018

09/10/2018

ARZAL SHAH SST (BIO/CHEM) BPS-16) GOVERNMENT  
HIGH SCHOOL SANDU KHEL MOHMAND. AGENCY  
GOVERNMENT OF KHYBER PAKHTUNKHWA EDUCATION  
DEPARTMENT..... APPELLANT.

VERSUS

1. GOVERNMENT OF KHYBER PAKHTUNKHWA THROUGH SECRETARY ELEMENTARY AND SECONDARY EDUCATION SECRETARIATE BUILDING PESHAWAR.
2. DIRECTOR ELEMENTARY AND SECONDARY EDUCATION DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION KHYBER PAKHTUNKHWA, PESHAWAR.
3. DEPUTY DIRECTOR (ESTABLISHMENT) ELEMENTARY AND SECONDARY EDUCATION DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION KHYBER PAKHTUNKHWA PESHAWAR.
4. DIRECTOR EDUCATION FATA, FATA SECRETARIAT KHYBER PAKHTUNKHWA, WARSAK ROAD PESHAWAR.
5. DEPUTY DIRECTOR (ESTABLISHMENT) DIRECTORATE OF EDUCATION, FATA SECRETARIAT KHYBER PAKHTUNKHWA, WARSAK ROAD PESHAWAR.
6. ADDITIONAL DIRECTOR (ESTABLISHMENT) DIRECTORATE OF EDUCATION, FATA SECRETARIAT KHYBER PAKHTUNKHWA, WARSAK ROAD PESHAWAR.
7. AGENCY EDUCATION OFFICER MOHMAND GALLANAI. *District Tehsil*
- ✓ 8. ACCOUNTANT GENERAL (PR) SUB OFFICE, PESHAWAR.
9. SECRETARY FINANCE DEPARTMENT FATA SECRETARIAT KHYBER PAKHTUNKHWA, WARSAK ROAD PESHAWAR.

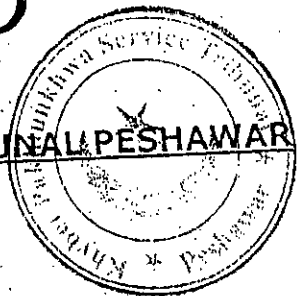
-----RESPONDENTS

ATTESTED

*[Signature]*  
EXAMINER  
Khyber Pakhtunkhwa  
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Peshawar

APPEAL U/S 4 OF THE SERVICE TRIBUNAL ACT, 1974  
AGAINST ORDER DATED 11.10.2017 OF RESPONDENT  
NO.4 & RESPONDENT NO.6 FOR NON OBSERVANCE OF  
PROMOTION/SENIORITY ORDER OF THE APPELLANT

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**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. 1266/2018

Date of Institution ..... 09.10.2018

Date of Decision ... 14.07.2021

Afzal Shah SST (BIO/CHEM BPS-16) Government High School Sandu Khel  
Mohmand Agency Government of Khyber Pakhtunkhwa Education Department.  
(Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through Secretary Elementary and  
Secondary Education Secretariat building Peshawar and eight others.  
(Respondents)

MR. HIDAYAT ULLAH KHATTAK &  
MR. ABDUR REHMAN MOHMAND  
Advocates

... For Appellants

MR. MUHAMMAD RIAZ AHMED PAINDAKHEIL  
Assistant Advocate General

... For Respondents

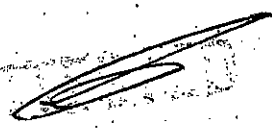
MR. SALAH-UD-DIN  
MR. ATIQ-UR-REHMAN WAZIR

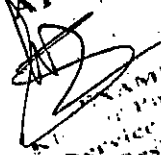
MEMBER (JUDICIAL)  
MEMBER (EXECUTIVE)

JUDGMENT

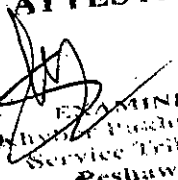
ATIQ-UR-REHMAN WAZIR MEMBER (E):- This judgment shall dispose of  
the instant Service Appeal as well as the following connected Service Appeals as  
common question of law and facts are involved therein.

- 1) Service Appeal bearing No.1267/2018 titled "Abi Hayat Versus Government of  
Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education  
Secretariat building Peshawar and others",




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- 2) Service Appeal bearing No. 1268/2018 titled "Shams Ur -Rahman Versus Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Secretariat building Peshawar and others".
- 3) Service Appeal bearing No. 1269/2018 titled "Karim Khan Versus Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Secretariat building Peshawar and others".
- 4) Service Appeal bearing No. 1270/2018 titled "Abdul Hakim Versus Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Secretariat building Peshawar and others".
- 5) Service Appeal bearing No. 1271/2018 titled "Stana Gul Versus Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Secretariat building Peshawar and others".
- 6) Service Appeal bearing No. 1272/2018 titled "Mohammad Idress Versus Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Secretariat building Peshawar and others".
- 7) Service Appeal bearing No. 1273/2018 titled " Mansoor Ahmad Khan Versus Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Secretariat building Peshawar and others".
- 8) Service Appeal bearing No. 1274/2018 titled " Khial Zada Versus Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Secretariat building Peshawar and others".
- 9) Service Appeal bearing No. 1275/2018 titled "Nizam-ud-Din Versus Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Secretariat building Peshawar and others".
- 10) Service Appeal bearing No. 1276/2018 titled "Sher Mohammad Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Secretariat building Peshawar and others".

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- 11) Service Appeal bearing No. 1277/2018 titled "Rahmat Said Versus Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Secretariat building Peshawar and others".
- 12) Service Appeal bearing No. 1278/2018 titled "Javid Akhter Versus Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Secretariat building Peshawar and others".
- 13) Service Appeal bearing No. 1279/2018 titled "Munawar Khan Versus Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Secretariat building Peshawar and others".
- 14) Service Appeal bearing No. 1280/2018 titled "Said Alam Shah Versus Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Secretariat building Peshawar and others".
- 15) Service Appeal bearing No. 1281/2018 titled "Lateef Ullah Versus Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Secretariat building Peshawar and others".
- 16) Service Appeal bearing No. 1282/2018 titled "Mst. Khalida Safi Versus Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Secretariat building Peshawar and others".
- 17) Service Appeal bearing No. 1283/2018 titled "Zar Gul Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Secretariat building Peshawar and others".
- 18) Service Appeal bearing No. 1284/2018 titled "Imtiaz Gul Versus Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Secretariat building Peshawar and others".
- 19) Khaista Sher Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".

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- 20) Service Appeal bearing No. 327/2019 titled "Abdul Hamid Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".
- 21) Service Appeal bearing No. 651/2018 titled "Sabeel Hassan Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".
- 22) Service Appeal bearing No. 652/2018 titled "Anwar Ali Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".
- 23) Service Appeal bearing No. 653/2018 titled "Javed Hassan Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".
- 24) Service appeal bearing No. 654/2018 titled "Luqman Hakeem Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".
- 25) Service Appeal bearing No. 655/2018 titled "Aziz-ur-Rehman Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".
- 26) Service Appeal bearing No. 656/2018 titled "Muhammad Muneer Khan Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".
- 27) Service Appeal bearing No. 657/2018 titled "Mst. Shah Begum Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".
- 28) Service Appeal bearing No. 658/2018 titled "Munir Khan Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".
- 29) Service Appeal bearing No. 659/2018 titled "Mst. Fahmeeda Begum Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".
- 30) Service Appeal bearing No. 660/2018 titled "Muhammad Baz Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".
- 31) Service Appeal bearing No. 661/2018 titled "Hanif Jan Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".
- 32) Service Appeal bearing No. 662/2018 titled "Sher Afzal Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".

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- 33) Service Appeal bearing No. 663/2018 titled "Mst. Dil Taj Begum Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".
- 34) Service Appeal bearing No. 664/2018 titled "Raees Khan Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".
- 35) Service Appeal bearing No. 665/2018 titled "Syed Hijab Hussain Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".
- 36) Service Appeal bearing No. 666/2018 titled "Eid Muhammad Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".
- 37) Service Appeal bearing No. 667/2018 titled "Fazal Hakeem Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".
- 38) Service Appeal bearing No. 668/2018 titled "Syed Zamir Hussain Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".
- 39) Service Appeal bearing No. 669/2018 titled "Janat Khan Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".
- 40) Service Appeal bearing No. 670/2018 titled "Ayan Ali Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".
- 41) Service Appeal bearing No. 671/2018 titled "Sohail Khan Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".

02. Brief facts of the case are that the appellants are primarily aggrieved by inaction of the respondents to the effect that promotions of the appellants were delayed for no good reason, which adversely affected their seniority positions as well as sustained financial loss. The appellant, Mr. Afzal Shah and 18 others were serving under Agency Education Officer, Mohmand Agency (Now District Mohmand) and the appellant Mr. Khaista Sher and 22 others were serving under Agency Education Officer, Orakzai Agency (Now District Orakzai). All the appellants were promoted to the post of Secondary School Teachers (SST) (BPS-16) vide order dated 11-10-2017, which, as per stance of the appellants were required to be to be promoted in 2014.

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Service Tribunal



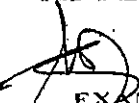
Feeling aggrieved, the appellants preferred respective departmental appeals against the impugned order dated 11-10-2017, which were not responded to, and hence the appellants filed service appeals in this Tribunal with prayers that promotions of the appellants may be considered from 24-07-2014 or the date when other employees serving in settled districts were promoted along with all back benefits.

03. Written reply/comments were submitted by the respondents.

04. Learned counsel for the appellant Mr. Afzal Shah and 18 others has contended that the appellants have not been treated in accordance with law and their rights secured under law and constitution have been violated; that the respondents delayed promotions of the appellants for no good reason, which adversely affected their seniority positions and made them junior to those, who were promoted at settled district level in 2014; that the delay occurred due to lethargic attitude of respondents, otherwise the appellants were equally fit for promotion like their counterparts working in settled districts; that the appellants were discriminated which is highly deplorable, being unlawful and contrary to the norms of natural justice; that inaction on part of the respondents have adversely affected financial rights of the appellants as protected by the Constitution. He further added that the appellant be treated at par like other employees of districts who were promoted in 2014 in pursuance of notification dated 24-07-2014 and shall equally be dealt with in accordance with law and rules.

05. Learned counsel for the appellant Mr. Khaista Sher and 22 others mainly relied on the arguments of the learned counsel for the appellant Mr. Afzal Shah and 18 others with further arguments that departmental appeals of the appellants were not considered and the appellants were condemned unheard; that as per constitution every citizen is to be treated equally, while the appellants have not been treated in accordance with law, which need interference.

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06. Learned Assistant Advocate General appeared on behalf of respondents has contended that as per Para-VI of promotion policy, promotions are always made with immediate effect and not with retrospective effect; that promotion is neither a vested right nor it can be claimed with a retrospective effect. Reliance was placed on 2005 SCMR 1742. Learned Assistant Advocate General argued that promotions of the appellants were made in accordance with law and rule and no discrimination was made. He further argued that some of the appellants submitted successive appeals, which is violation of Rule 3(2) of Appeal Rules, 1986. Learned Assistant Advocate General prayed that appeals of the appellants being devoid of merit may be dismissed.

07. We have heard learned counsel for the parties and have perused the record.

08. A perusal of record would reveal that all the appellants were employees of the provincial government, who were deputed to serve in Ex-FATA under the control of Director of Education Ex-FATA, whereas their other colleagues working in settled districts were working under the control of Director of Education at provincial level. The provincial Government vide Notification dated 24-07-2014 had issued criteria for promotion of teachers to next grades, which was equally applicable to provincial as well as employees working in Ex-FATA. To this effect, the provincial directorate of Elementary & Secondary Education KP vide letter dated 07-08-2014 had asked the Directorate of Education Ex-FATA to fill in the vacant posts of SST in Ex-FATA by promotion of in-service teachers under the existing service rules. The said letter lingered in the Directorate of Ex-FATA for almost seven months, which finally was conveyed to all Agency Education Officers vide letter dated 09-03-2015 with directions to submit category wise lists of candidates for promotion against the post of SST. Agency Education Officers took another two years and seven months, while submitting such information to the directorate of Ex-FATA and finally the appellants

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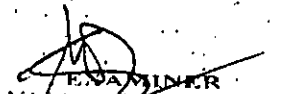


were promoted vide order dated 11-10-2017. On the other hand, the office of the District Education Officer in the settled district took timely steps and the promotions were made possible in the same year i.e. 2014. Placed on record is a Notification dated 01-11-2014 issued by District Education Officer Charsada, whereby promotions had been made in pursuance of the Notification dated 24-07-2014 in the same year, whereas promotions in Ex-FATA were made in 2017 with delay of more than three years. Placed on record is another Notification dated 14-03-2017 issued by Directorate of Education Ex-FATA promoting Certified Teachers (CT) (BPS-15) to the post of Senior CT (BPS-16) w.e.f 20-02-2013, negating their own stance that promotions are always made with immediate effect. Similarly placed teachers was extended the benefit of their promotion with retrospective effect, however the respondents are denying the same to the appellants for the reasons best known to them. The material available on the record, would suggest that the appellants were treated with discrimination.

09. The appellants are primarily aggrieved by the inaction of the respondents to the effect that all the appellants were otherwise fit for promotion to the post of SST, but their promotions were delayed due to slackness of the directorate of education, which adversely affected their seniority position as well as suffered financially due to intentional delay in their promotions. The respondents also did not object to the point of their fitness for further promotion at that particular time.

10. We have observed that seniority of the appellants as well as their other counterparts working at Districts level had been maintained at Agency/District level before their promotion to the post of SST, whereas upon promotion to the post of SST, the seniority is maintained at provincial level and the appellants who were promoted in 2017 in comparison to those, who were promoted in 2014, would definitely find place in the bottom of the seniority list maintained at provincial level with dim future prospects of their further promotions, as well as they were kept


**ATTESTED**

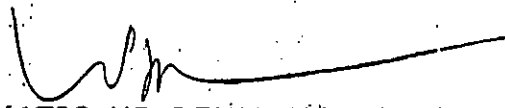
  
EXAMINER  
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Service Tribunal

deprived of the financial benefits accrued to them after promotion for no fault of them, hence they were discriminated. It was noted with concern that the only reason for their delayed promotion was slackness on part of directorate of education Ex-FATA and its subordinate offices at Agency level, which had delayed their promotions for more than three years for no fault of the appellants.

11. In view of the foregoing discussion, the instant appeals are accepted and all the appellants are held entitled for promotion from the date, the first batch of their other colleagues at provincial level were promoted in the year 2014 with all consequential benefits. Parties are left to bear their own costs. File be consigned to record room.

**ANNOUNCED**  
14.07.2021

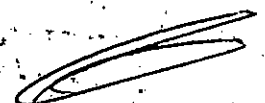
  
(SALAH-UD-DIN)  
MEMBER (JUDICIAL)

  
(ATIQ-UR-REHMAN WAZIR)  
MEMBER (EXECUTIVE)

**EXAMINER**  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

Date of Presentation of Application \_\_\_\_\_  
Number of Words \_\_\_\_\_  
Number of Copy \_\_\_\_\_  
Number of Copy \_\_\_\_\_

Date of Presentation of Application 05/10/21  
Number of Words 6102  
Copying Fee 42/-  
Urgent 4/-  
Total 46/-  
Name of Copy \_\_\_\_\_  
Date of Completion of Copy 05/10/21  
Date of Delivery of Copy 05/10/21



**ANNEX E****24**

DIRECTORATE OF ELEMENTARY &  
SECONDARY EDUCATION KHYBER  
PAKHTUNKHWA  
PHONE: 011-3333333, 011-3333334  
011-3333335, 011-3333336  
FAX: 011-3333334

NO. .... DATED .....

## Notification

In pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.SO(PE)/4-5/SSRC/Meeting/2013/Teaching Cadre dated 24<sup>th</sup> July, 2014 and recommendations of the Departmental Promotion Committee, the following SCTs/CTs, SDMs/DMs, SATs/ATs, STTs/TTs, Senior Qaris/Qaris, PSHTs/SPSTs/PSTs of District Mohmand, are hereby promoted to the post of SST (Bio-Chem), SST (Phy-Maths), SST (General) and posted in the schools noted against each in BPS-16 (Rs. 18910-1520-64510) plus usual allowances as admissible under the rules on regular basis under the existing policy, on the terms and condition given below, with immediate effect in the interest of public service.

### PROMOTION OF SPST/PSHT/PST TO SST (Bio/Chem) BPS-16 ON REGULAR BASIS.

|  |    |
|--|----|
| Total No of SST Bio/Chem(M) vacant posts | 24 |
| 25% Share of Initial Recruitment         | 6  |
| 75 % Share of promotion                  | 18 |
| 20% share of promotion of PSHT/SPST/PST  | 5  |
| No of SST already promoted               | 0  |
| Post Available for Promotion             | 5  |
| Promoted through this order              | 2  |

| S.No | Sl. No. | Name of Official | Place of posting | D/O Birth  | Date of Appott; regular PST | Qualification | Posted at      | Remarks    |
|------|---------|------------------|------------------|------------|-----------------------------|---------------|----------------|------------|
| 1    | 230     | Anwar Khan       | GPS Abdul Baqi   | 2-2-1967   | 27-2-1995                   | BSc/B.Ed      | GHS Sandu Khel | AVP        |
| 2    | 470     | Ghulam Muhammad  | GPS Tarakai      | 12-11-1983 | 1-9-2010                    | BSc/B.Ed      | GHS Nahaqi     | Vice No.22 |

### PROMOTION OF Sr: CT/CT TO SST (Bio-Chem) BPS-16 ON REGULAR BASIS

|  |    |
|--|----|
| Total No of SST Bio/Chem(M) vacant posts | 24 |
| 25% Share of Initial Recruitment         | 6  |
| 75 % Share of promotion                  | 18 |
| 40 % share of promotion of Sr CT/CT      | 10 |
| No of SST already promoted               |    |
| Post Available for Promotion             |    |
| Promoted through this order              |    |

| S.No | S.L No | Name of Official | Place of Posting | Date of Birth | Date of Appott: as Regular CT | Qualification | Posted at        | Remarks |
|------|--------|------------------|------------------|---------------|-------------------------------|---------------|------------------|---------|
| 3    | 52     | Said Wali        | GHSS Ghallani    | 2-5-1971      | 1-9-1999                      | B,Sc/B,Ed     | GHSS Ghallani    | AVP     |
| 4    | 54     | Bashir Ahmad     | GHSS Ghallani    | 15-7-1973     | 1-9-1999                      | B,Sc/B,Ed     | GHS Akhunzadgan  | AVP     |
| 5    | 55     | Shoukat Ali      | GHS Shalam Salay | 22-4-1969     | 1-9-1999                      | B,Sc/B,Ed     | GHS Shalam Salay | AVP     |
| 6    | 69     | Nawaz Khan       | GHS Ghami Kor    | 6-6-1973      | 9-12-2002                     | B,Sc/B,Ed     | GHS Dab Kor      | AVP     |

**PROMOTION OF SCT/ CT Male TO SST (Math:Phy) BPS-16 ON REGULAR BASIS**

|   |           |
|---|-----------|
| <b>Total No of SST Math/Phy(M) vacant posts</b> | <b>13</b> |
| 25% Share of Initial Recruitment                | 3         |
| 75 % Share of promotion                         | 10        |
| 40 % share of promotion of Sr CT/CT             | 5         |
| No of SST already promoted                      | 2         |
| Post Avialable for Promotion                    | 3         |
| Promoted through this order                     | 2         |

| S No | Sl: No. | Name of Official | Place of posting | D/O Birth  | Date of Appott; regular PST | Quilif- cation | Posted at     | Remarks   |
|------|---------|------------------|------------------|------------|-----------------------------|----------------|---------------|-----------|
| 7    | 36      | Alam Zeb         | GHS Ekka Ghund   | 13-10-1968 | 19-9-1998                   | B,Sc/B.Ed      | GHS Ekkaghund | V.S.No.21 |
| 8    | 42      | Muhammad Ilayas  | GHS Subhankhwar  | 25-9-1972  | 24-7-1999                   | B,Sc/B.Ed      | GHS Kog Pand  | AVP       |

**PROMOTION OF PST TO SST (Math/Phyl) BPS-16 ON REGULAR BASIS**

|  |           |
|--|-----------|
| <b>Total No of SST Phy/Maths(M) vacant posts</b> | <b>13</b> |
| 25% Share of Initial Recruitment                 | 3         |
| 75 % Share of promotion                          | 10        |
| 20% share of promotion of PSHT/SPST/PST          | 3         |
| No of SST already promoted                       | 1         |
| Post Avialable for Promotion                     | 2         |
| Promoted through this order                      | 2         |

| S. No | S.L No | Name of Official | Place of Posting   | Date of Birth | Date of Appott: as Regular DM | Qualifi- cation | Posted at     | Remarks |
|-------|--------|------------------|--------------------|---------------|-------------------------------|-----------------|---------------|---------|
| 9     | 196    | Mir dad Khan     | GPS Ghulam Jan Kot | 30-8-1969     | 25-10-1994                    | B,Sc/B.Ed       | GHS Qamar Din | AVP     |
| 10    | 228    | Azam Khan        | GPS Pai Khan       | 15-2-1970     | 20-2-1995                     | B,Sc/B.Ed       | GHS Nahaqi    | AVP     |

**PROMOTION OF SCT/CT TO SST (General) BPS-16 ON REGULAR BASIS**

|  |           |
|--|-----------|
| <b>Total No of SST General(M) vacant posts</b> | <b>30</b> |
| 25% Share of Initial Recruitment               | 7         |
| 75 % Share of promotion                        | 23        |
| 40 % share of promotion of Sr CT/CT            | 12        |
| No of SST already promoted to SST              | 5         |
| Post Avialable for Promotion                   | 7         |
| Promoted through this order                    | 6         |

| S. No | S. L No | Name of Official | Place of Posting | Date of Birth | Date of Appott: as Regular CT | Qualifi- cation | Posted at             | Remarks |
|-------|---------|------------------|------------------|---------------|-------------------------------|-----------------|-----------------------|---------|
| 11    | 2       | Khan Bahadar     | GHS Prang Ghar   | 3-3-1960      | 3-2-1983                      | BA/BEEd         | GMS Bahi Dag          | AVP     |
| 12    | 4       | Saif ur. Rehman  | GHS Suban Khur   | 10-10-1963    | 31-12-1986                    | BA/BEEd         | GMS Navi Kali Ghandab | AVP     |
| 13    | 9       | Amir Badshah     | GMS GatWarsak    | 21-3-1965     | 13-3-1986                     | BA/B,Ed         | GMS Gat o Warsak      | AVP     |
| 14    | 12      | Wasi Ullah       | GHS Hasham Kor   | 15-3-1964     | 17-9-1988                     | BA/B.Ed         | GMS Kandī Essa Khel   | AVP     |
| 15    | 14      | Hidayat Ullah    | GHS Ghami Kor    | 23-1-1965     | 7-12-1989                     | BA/B,Ed         | GHS Ekka Ghund        | AVP     |
| 16    | 15      | Jafar Khan       | GHS Kogpand      | 14-2-1960     | 20-12-1989                    | BA/B,Ed         | GMS Gul Baz           | AVP     |

**PROMOTION OF SPST/PHST/PST/TO SST (General) BPS-16 ON REGULAR BASIS**

|   |    |
|---|----|
| Total No of SST General(M) vacant posts | 30 |
| 25% Share of Initial Recruitment        | 7  |
| 75 % Share of promotion                 | 23 |
| 20% share of promotion of PSHT/SPST/PST | 6  |
| No of SST already promoted              | 2  |
| Post Available for Promotion            | 4  |
| Promoted through this order             | 4  |

| S. No | S.L No | Name of Official    | Place of Posting    | Date of Birth | Date of Appott: as Regular AT | Qualifi- cation | Posted at          | Remarks |
|-------|--------|---------------------|---------------------|---------------|-------------------------------|-----------------|--------------------|---------|
| 17    | 114    | Misal Khan          | GPS Wacha Jawra     | 24-1-1967     | 17-9-1988                     | BA/B,Ed         | GMS Asmarai        | AVP     |
| 18    | 115    | Muhammad Naeem Khan | GPS Naeem Kor       | 18-12-1970    | 17-9-1988                     | BA/B,Ed         | GMS Halki Ghandhab | AVP     |
| 19    | 134    | Fazal Gul           | GPS Dara Zahir Khan | 1-1-1966      | 1-10-1989                     | BA/B,Ed         | GMS Sohail Kor     | AVP     |
| 20    | 135    | Hussain Ahmad       | GPS Mozi Kot        | 20-12-1971    | 1-10-1989                     | BA/B,Ed         | GMS Ghazi Baig     | AVP     |

**Consequential Transfer:**

| S. No | Name/Designation/School         | Posted at      | Remarks |
|-------|---------------------------------|----------------|---------|
| 21    | Afzal Shah SST GHS Ekkaghund    | GHS Navi Kalli | AVP     |
| 22    | Nizam Ud Din SST (G) GHS Nahagi | GHS Ghazi Baig | AVP     |

**Terms and conditions:-**

- 1 They would be on probation for a period of one year extendable for a further period of one year.
- 2 They will be governed by such rules and regulations as and when issued from time to time by
- 3 Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
- 4 Charge report should be submitted to all concerned.
- 5 No TA/DA is allowed for joining his duty.
- 6 They will give an under taking to be recorded in their service book to the effect that if any over payment is made to him/her in the light of this order will be recovered and if he/she is wrongly promoted, he/She will be reverted.
- 7 Before handing over charge once again their document may be checked if they have not the prescribed qualifications as per rules, they may not be handed over charge of the post.
- 8 The prescribed qualifications/ documents may be verified from the concerned Universities/ Institutions by the AEO concerned.

(Hafiz Muhammad Ibrahim)  
Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa

Endst: No. 5261-300

Dated Peshawar the 29/3 /201

Copy forwarded for information and necessary action to the: -

1. Accountant General (PR) Sub Office, Peshawar.
2. Additional Accountant General (PR) Sub Office, Peshawar.

3. District Education Officer Mohmand at Ghallani.
4. District Accounts Officer Mohmand at Ghallani.
5. PS to Secretary Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
6. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
7. Principal/Head Master concerned.
8. Promotees Concerned.
9. M/File.

*28/03/14*  
Deputy Director (Estab.)  
Merged District Khyber Pakhtunkhwa

*[Handwritten mark]*

To

The Secretary (E&SE) Department,  
Khyber Pakhtunkhwa, Peshawar.

Subject:

**DEPARTMENTAL APPEAL FOR PROMOTION TO THE  
POST OF SST (MATH:PHY) WITH RETROSPECTIVE  
EFFECT AND NOT WITH IMMEDIATE**

R/Sir,

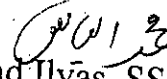
Most respectfully, it is stated that I am initially appointed as PTC now PST (BPS-9) on 01.09.1999 after fulfilling all the formalities. In the year 2012 the government had notified service structure/ rules for promotion of the PST(s) and SST(s) to SS and other different disciplines. Department vide notification dated 24-07-2014 promoted many of our colleague teachers of the province working on settle side on the post of PST to the post of SST (BPS-16) and accordingly by following the analogy vide notification dated 1-11-2014 teachers working as PSTs of the District Charsadda were promoted to the posts of SST (BPS-16) in light of notification dated 24-07-2014 and as such some of my colleagues who were working in FATA were also promoted to the post of SST (BPS-16) but with immediate effect and from the date when his colleagues working on settle side were promoted i.e. w.e.f 24-07-2014 those promoted colleagues knocked the door of Khyber Pakhtunkhwa Service Tribunal in appeal No. 1266/2018 which was decide in favour of my colleagues vide judgment dated 14-07-2021.

I was also promoted to the post SST (BPS-16) vide impugned notification dated 29-03-2019 but with immediate effect and not from the date when the other teachers are promoted i.e. w-e-f 1.11.2014 or 24-07-2014.

In light of the above and keeping the judgment passed by the Service Tribunal and treat me like other similarly placed employees of the service appeal No. 1266/2018 decided on 14-07-2021 and obliged, please.

Dated: 13<sup>th</sup> August 2021

Sincerely Yours,

  
Muhammad Ilyas, SST (BPS16)  
GHS Kog Pand, Distric Mohmand.

**VAKALATNAMA**

29

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

APPEAL NO: \_\_\_\_\_ OF 2021

Muhammad Ilyas (APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

**VERSUS**

Education Deptt. (RESPONDENT)  
(DEFENDANT)

I/We M. Ilyas  
Do hereby appoint and constitute **NOOR MUHAMMAD KHATTAK Advocate, 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 cost. 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.

Dated. \_\_\_\_/\_\_\_\_/2021

محمد الیاس  
CLIENTS

ACCEPTED

NOOR MUHAMMAD KHATTAK

Kamran Khan  
KAMRAN KHAN

Said Khan  
SAID KHAN

Haider Ali  
HAIDER ALI

&  
KHAZAD GUL  
ADVOCATES