


09.01.2019


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


(Muhammad Amin Khan Kundi)
Member
Camp Court Swat

06.03.2019


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 As such application is allowed and the instant appeal is hereby withdrawn.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

Announced:
06.03.2019


Member
Camp Court, Swat

04.10.2018

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


Member
Camp Court Swat

07.11.2018

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


Reader

06.12.2018

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


Member

Camp Court, Swat

07.12.2018

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


Member

Camp Court, Swat.


06.07.2018

Appellant Muhtaram Shah alongwith his counsel Mr. Shamsul Hadi, Advocate present and heard on preliminarily.

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


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

Appellant Deposited
Security & Process Fee


Chairman
Camp court, Swat

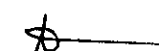
08.08.2018

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


Reader

06.09.2018

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


Member
Camp Court Swat

Form-A
FORM OF ORDERSHEET

Court of _____

Case No. 511/2018

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	11/04/2018	<p>The appeal of Mr. Muhtaram Shah presented today by Mr. Shamsul Hadi Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"><i>[Signature]</i> REGISTRAR 11/4/18</p>
2-	23.4.2018	<p>This case is entrusted to Touring S. Bench at Swat for preliminary hearing to be put up there on <u>06-07-2018</u></p> <p style="text-align: right;"><i>[Signature]</i> CHAIRMAN</p>

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

Service Appeal No. 511/2018.

Mukhtaram Shah.....Appellant

V E R S U S

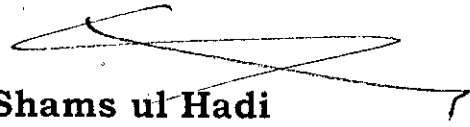
District Education Officer (M) and others.....Respondents

I N D E X

S.N	Description of Documents	Annex	Pages
1.	Memo of Appeal along with Affidavit.		1-5
2.	Stay Application and affidavit.		6-7
3.	Addresses of Parties.		8
4.	Copies of Promotion order and certificates	A	9-16
5.	Copies of Rules, list of vacant posts and advertisement, application.	B	17-27
6.	Copies of Writ petition and judgment.	C	28-32
6.	Copy of representation.	D	33
7.	Copies of promotion of others.	E	34-39
7.	Wakalat Nama		40

Appellant

Through


Shams ul Hadi
Advocate.

Office: H/No.6 near al-Falah Mosque
Hayat Abad, Mingora.

Cell No.0347-4773440.

1

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

Service Appeal No. 511 /2018.

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 537

Dated 11-4-2018

Mukhtaram Shah (C.T)

Presently posted at GHS Swari, Bunir.....Appellant.

V E R S U S

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

.....Respondents

**APPEAL UNDER SECTION 4 OF KHYBER
PUKHTUNKHWA SERVICES TRIBUNAL ACT
1974 AGAINST NON- IMPLEMENTATION OF
POLICY/NOTIFICATION NO.SO(PE) 4-
5/SSRC/MEETING/2013/TEACHINGCADRE
DATED;24.07.2014⁷ AGAINST WHICH THE
APPELLANT FILED DEPARTMENTAL
APPEAL WHICH WAS NOT DECIDED WITHIN
STATUTORY PERIOD.**

Filed to-day
Registrar
11/4/18

PRAYER IN APPEAL:

On acceptance of this appeal the POLICY/NOTIFICATION
NO.SO(PE)4-5/SSRC/MEETING/2013/TEACHING CADRE
DATED;24.07.2014³ of para 1.B may kindly be implemented letter
and spirit and the appellant may kindly be promoted to the post of
SST- BPS-16 according to his seniority.

Respectfully Sheweth:

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

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

GROUND:

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

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

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

Or

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

Appellant

M. Ishaq
Mukhtaram Khan
Mukhtaram Shah

Through


Shams ul Hadi

Dated: 03/04/2018.

Advocate, Peshawar.

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR.

Service Appeal No. _____/2018.

Mukhtaram Shah.....Appellant

V E R S U S

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

AFFIDAVIT

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




ADVOCATE

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

Service Appeal No. _____/2018.

Mukhtaram Shah.....Appellant

V E R S U S

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


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

Respectfully Sheweth:

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

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

Through

Applicant

Shams-ul-Hadi
Advocate High Court.

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

Service Appeal No. _____/2018.

Mukhtaram Shah.....Appellant

V E R S U S

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

AFFIDAVIT

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


DEPONENT

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

Service Appeal No. _____/2018.

Mukhtaram Shah.....Appellant

V E R S U S

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

ADDRESSES OF THE PARTIES

APPELLANT:

Mukhtaram Shah C.T

Presently posted at GHS Swari Bunir

Cell No.

RESPONDENTS:

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

Appellant

Through


Shams ul Hadi

Advocate, Peshawar.

Dated: 04/04/2018

NOTIFICATION

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

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

C.T (Male)Deceased Candidate.

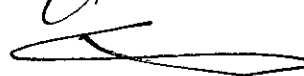
S.No	Name	Father Name	Residence	D.O.B	School Where Posted
1	IJAZ UL HAQ	AZIZ'UL HAKIM	TEHSIL DAGGAR	20/03/1991	GHS GHAZIABANA

Open Merit Candidates:

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

Terms and Conditions:-

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

etc


Amir
 R. A.
 12

19/9/11

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

Consequent upon the recommendation of the departmental selection Committee (DSC) held on 05/09/2012, as contained in the minutes of the meeting issued vide his office No.11____65 dated 05/09/2012.

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

C.T (Male)


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

Open merit candidate

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

Terms and condition

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

C.T.C


10

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

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

Dated 19/1/2012.

Encl: No. 19117-19

Copy to the:-

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

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10) Better copy /

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


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

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

Endst No. 12/17.19 dated

dated 19/09/2012

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

CAC




UNIVERSITY OF PESHAWAR
(Pakistan)

11

Department of Botany

Master of Science in Botany (FINAL)
Annual Examination 2004

Detailed Marks Certificate

Required Pass Percentage - 40 Aggregate Pass Percentage - 45

Name: *Muhtaram Shah*

Gender: *Male* Roll No. **3152**

Father's Name: *Raziq Shah*

Registration No. **99-DR-1262**

Papers (New Course)	Marks Obtained		
	Maximum Marks	in Figures	in Words
Cell Biology and Biometry (VII)	100	60	Sixty only
Plant Physiology (VIII)	100	61	Sixty One
Genetics (IX)	100	55	Fifty Five
Environmental Biology (X)	100	58	Fifty Eight
Medicinal Plants and Economic Botany (XI)	100	69	Sixty Nine
Paper-XII Plant Pathology (Optional):	100	73	Seventy Three
Marks in M.Sc. Previous	600	380	Three Hundred and Eighty only
Total:	1200	756	Seven Hundred and Fifty Six

The examination was passed *as a Whole in First division.*

Examination Held in Theory: 21.02-22.02; Practicals/Viva Voce: 03-09.02, 2004
Result Declared on February 14, 2005

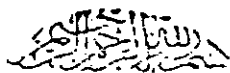
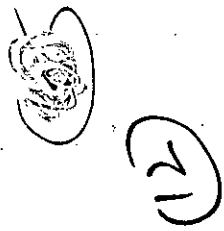
[Signature]
Controller of Examinations
University of Peshawar

DMC issued on: 21/02/05 at 11:33:20

MAU's Engineering, Very First Time in History of Peshawar University

No. 041992

[Handwritten signatures and initials]



University of Peshawar (Pakistan)

Session ANNUAL 2004

MUHTARAM SHAH

SON

of

RAZIQ SHAH

[Handwritten signatures]

Student of UNIVERSITY OF PESHAWAR

having passed the prescribed examination held in AUGUST 2004

is this day admitted by the University of Peshawar to the Degr of

Master of Science

In the FIRST Division

The Subject of examination being BOTANY

The Examination was taken as a whole / in parts.

Serial No. 010401

[Handwritten signature]
Registrar

Registration No. 99-DR-1202

Roll No. 3152

Declared on FEBRUARY 14, 2005



Counters
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Vice-Cha. or

13



UNIVERSITY OF PESHAWAR

(PAKISTAN)

No 006193



Roll No. 6193

Detail Marks Certificate
B.Sc. Part II Examination, 2001 (Annual)

Name: Muhtasam Shah

Father's Name: Razq Shah

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

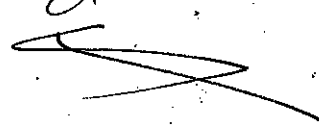
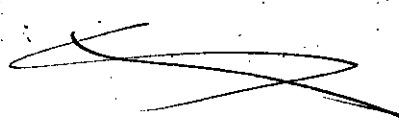
SUBJECTS	MAXIMUM MARKS	MARKS OBTAINED	
		IN FIGURES	IN WORDS
Chemistry	75	35	thirty five
Botany	75	42	forty two
Zoology	75	36	thirty six
Pakistan Studies	40	27	Twenty Seven
Part-I marks	285	147	
TOTAL	550	287	Two Hund. & Eighty Seven

Errors & omissions are subject to subsequent rectification.

Examination was taken as a WHOLE / IN PARTS.

Date: 25 SEP 2001


CONTROLLER OF EXAMINATIONS
UNIVERSITY OF PESHAWAR

d/c

d/c




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University of Peshawar

(Pakistan)

Session ANNUAL 2001

MUHTARAM SHAH

SON of

FAZIQ SHAH

and a

Handwritten signature at the bottom right.

student of GOVT. DEGREE COLLEGE DAGGAR having passed the prescribed examination held in JUNE 2001 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~~

etc
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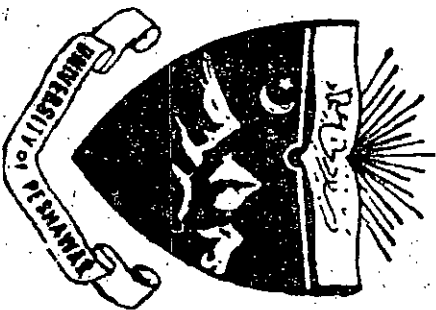
Serial No 020473

Registration No. 99-DE-1262

Roll No.

6193

Admitted on SEPTEMBER 25, 2001



M. I. Anwar
Registrar

Countersigned

Handwritten signature of the countersigned official.

Office of Registrar



ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD

RESULT INTIMATION CARD

15

Serial No. 123559

Registration No. 02NBR0054

Roll No. L652100

Certified that Mr/Ms. MUHTARAM SHAH

Father's Name RAZIQ SHAH

has Successfully Completed the BACHELOR OF EDUCATION(B.ED)

programme. The detail of course is as under

Address:- VILL KALPANI MOH, BARO,DAGGAR DIST. BUNIR

Address:-

Semester	Course Code	Title of the Course	Marks	
			Maximum	Obtained
SPR- 02	0513	SCHOOL ORGANIZATION MANAGMENT	100	53
SPR- 02	0514	EVALUATION,GUIDANCE & RESEARCH	100	45
SPR- 02	0518	EDUCATIONAL TECHNOLOGY & CURR:	100	55
SPR- 02	0651	ENGLISH (C)	100	47
SPR- 03	0512	PROSPECTIVE OF EDUCATION	100	62
SPR- 03	0652	ISLAM, PAKISTAN AND MODERN WORLD	100	55
SPR- 03	0655	WORKSHOP	100	70
SPR- 04	0653	TEACHING OF CHEMISTRY	100	65
AUT- 02	0520	TEACHING OF BIOLOGY	100	65
			900	517

Total Credit Hours **

Total AIOU Credits 6

Result declared on March 10, 2005

Date of Issue: APR 01, 2005

Total Marks Obtained 517

Percentage Marks 57.33

CGPA **

Jasir
Controller of Examinations

Note: This result card is issued as a notice only; errors and omissions are excepted. An entry appearing in it does not in itself confer any right or privilege independently to the grant of proper certificate/degree which will be issued under the regulations in due course of time.

af.c

16

Allama Iqbal Open University Islamabad



Serial No. 98926

Certified that Mr. / Ms. MUHTARAM SHAH

Son / Daughter of RAZIQ SHAH

Registration No: 02-NBR-0054 Roll No: L-652100

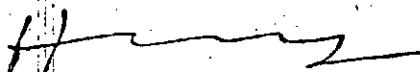
having completed the prescribed requirements in semester

SPRING 2004

is awarded the degree of:

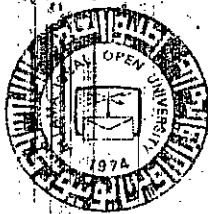
Bachelor of Education (B.Ed)

He / She has secured 57 % marks and has been placed in C grade.



CONTROLLER OF EXAMINATIONS

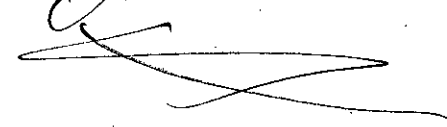
Result declared on: March 10, 2005




VICE-CHANCELLOR

c-c

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

c-c


GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Peshawar, dated the 24th July, 2014.



NOTIFICATION

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

AMENDMENTS

In the Appendix,-

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

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

(1)

Handwritten notes and stamps on the left margin, including 'Khyber Pakhtunkhwa', 'Shah Zaman', '17', and a circular stamp.

Handwritten signature on the right margin.

Director Physical Education (BPS-17)

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

22-35 years

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

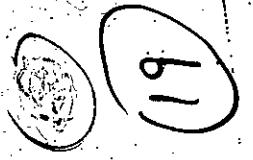
Provided that if no suitable candidate is available from amongst Senior Physical Education Teachers for promotion the post shall be filled by promotion, on the basis of seniority-cum-fitness, amongst the Physical Education Teachers with at least five years service as such having qualification mentioned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

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

(b) fifty percent by initial recruitment "

J-C
[Signature]

(F) namely:



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

20 f

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

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

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

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

C.T.C



21

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

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

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

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

Provided that if no candidate is available from

C.F.C

22



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

Provided further candidate is available Senior Primary School promotion then the post from amongst Primary with at least seven years and having qualification column No.3; and

(ii) twenty five per recruitment.

Note:

I. If no suitable candidate in the relevant cadre of the post falling in their shall be filled by initial

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

C.F.C

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, (PJTE) Khyber Pakhtunkhwa Peshawar.
10. The Director, ESRU Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
11. Manager Government Printing Press Khyber Pakhtunkhwa Peshawar.
12. The Deputy Director, EMIS (S&SE) Department Khyber Pakhtunkhwa Peshawar.
13. All District Education Officer (M&F) in Khyber Pakhtunkhwa.
14. All District Account Officer in Khyber Pakhtunkhwa.
15. All Agency Education Officer in FATA.
16. All Agency Account Officer in FATA.
17. PS to Governor Khyber Pakhtunkhwa. Peshawar.
18. PS to Chief Minister Khyber Pakhtunkhwa. Peshawar.
19. PS to Chief Secretary Khyber Pakhtunkhwa. Peshawar.
20. PS to Minister E&SE Khyber Pakhtunkhwa. Peshawar.
21. PS to Secretary E&SE Khyber Pakhtunkhwa. Peshawar.
22. Master file

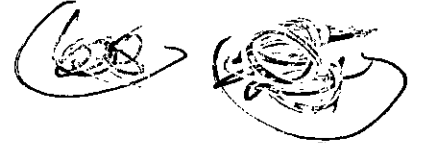
(ZAMIN KHAN MOMAND)
SECTION OFFICER (PRIMARY)


(7)

C.J.C

23

24



	DISTRICT BUNER (Male)
District Cadre SST Posts 2017-2018	

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

at-l


at-a


25


DISTRICT BUNER (Male)
District Cadre SST Posts 2017-2018

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

c.t.c

c.t.c

To,

27
The District Education Officer (M)
Bunes.

Subject: Request for the provision of C.T. Seniority List.

Sir,

Most humbly I beg to state that I need Seniority List to confirm my Seniority number for promotion to S.S.T (B.S.D. Chemistry).

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

I shall be very grateful to you for that.

Yours obediently

~~M. S.~~
Muhtarum Shah C.T.

GHS Sawari Bunes.

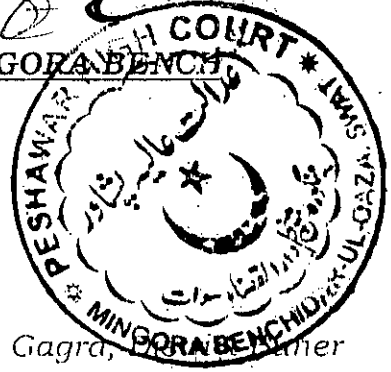
Date: 03-04-2018

C.T.C

BEFORE THE PESHAWAR HIGH COURT, MINGORA BENCH

W.P No. 870 -M/2017.

28



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

VERSUS

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

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

Respectfully Sheweth:

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

FACTS:

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

Re-Filed Today

08 DEC 2017

Additional Registrar

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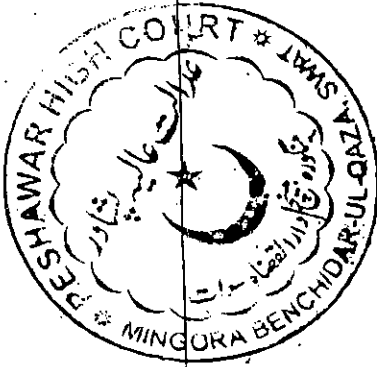
PESHAWAR HIGH COURT, MINGORA BENCH (DAR-UL-QAZA),
SWAT.

29

FORM "A"

FORM OF ORDER SHEET.

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



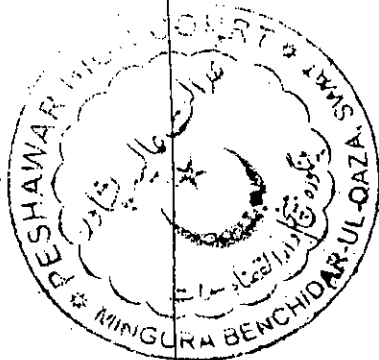
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Primary School Teacher (PST) in the year 2012 and were promoted to the posts of Certified Teacher (C.T). According to the rules and policy the petitioners deserve to be promoted as Secondary School Teachers (S.S.T) according to 75% promotion quota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

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

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



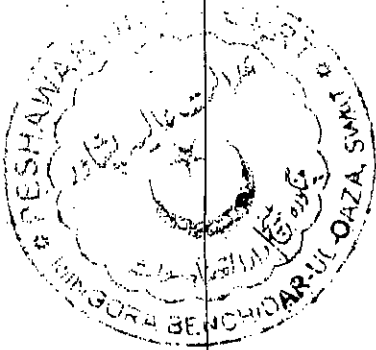
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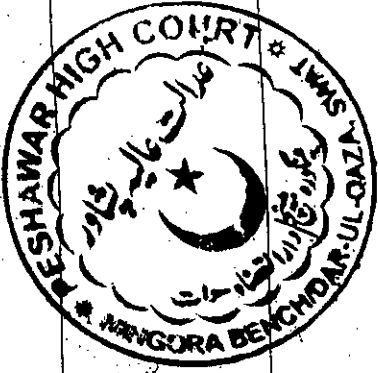
the Senior Certified Teacher (BPS-16) with completion of almost five years service as Senior Certified Teachers and Certified Teachers etc. Learned counsel for the petitioners has referred the judgments reported as 1998 SCMR 208, 2004 PLC (C.S) 828, 2009 PLC (C.S) 40 and 2014 PLC (C.S) 773. The judgments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

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



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

[Signature]
JUDGE

[Signature]
JUDGE

Announced.
Dt.13.12.2017.

Certified to be true copy

EXAMINER
Peshawar High Court, Mingora/Dar-ul-Qaza, Swat
Authorized Under Article 07 of Qanoon-e-Mahadat Order 1984

[Signature]

89/ 24/12

(A-K-KHAN)

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

33 Amin
W.D.

To

The district education officer (M)
Buner

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

Respected Sir,

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

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

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

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

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

Yours Obediently,

Name of Teacher:

Mukhtam Shah et

Signature:



Dated:

15/12/2017

A-c



(34)

3

Answer

(K)

E



Khyber Pakhtunkhwa Peshawar

PH.No. 091-9210389, 9210938,
9210437, 9210957, 9210468
Fax 091-9210936, 0800-33857
E-mail rafiq_kk851@yahoo.com

Notification

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

A. SST (General)

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

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

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

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

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

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

Terms and conditions:-

- 1 They would be on probation for a period of one year extendable for another one year.
- 2 They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 3 Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be preceded under the rules framed from time to time.
- 4 Charge report should be submitted to all concerned.
- 5 Their Inter-Se-seniority on lower post will remain intact.
- 6 No TA/DA is allowed for joining his duty.

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SWAT 2 *[Handwritten mark]*

will give an under taking to be recorded in their service book to the effect that if any other payment is made to him in light this order will be recovered and if he/she is wrongly promoted he/She will be reversed.

They will be governed by such rules and regulations as may be issued from time to time by the Govt.

Before handing over charge once again their document may be checked if they have not the required relevant qualifications as per rules, they may not be handed over charge of the post.

(Muhammad Rafiq Khattak)

Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst: No. 1087-012 / File No. 2/Promotion SST-B-16: Dated Peshawar the 04/12/2018

Copy forwarded for information and necessary action to the: -

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

[Signature] 23/1/18
Dy: Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

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(MALE) SWAT

NOTIFICATION

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

SST (GENERAL) PROMOTION OF SCT TO SST

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

SST (GENERAL) PROMOTION OF PSHT TO SST

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

(NAWAB ALI)
DISTRICT EDUCATION OFFICER (M)
SWAT.

Endst: NO. 1287-92-99 /P.F/SST(G)/Promotion/V/Post/DEO/Swat.

Dated @ 1/6 /2018.

Copy forwarded to:-

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

DISTRICT EDUCATION OFFICER (M)
SWAT

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DISTRICT EDUCATION OFFICER
(MALE) SWAT

CORRIGENDM.

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

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

Endst:NO. 9177-79 /Promotion/SST

Copy forwarded to :-

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

(NAWAB ALI)
DISTRICT EDUCATION OFFICER
MALE SWAT

Dated 20/2/2018

DISTRICT EDUCATION OFFICER
MALE SWAT



NOTIFICATION.

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

S.#	Name of Teacher	Present Place of Posting	School where Posted	Remarks
1	Abdul Qayum	GMS Kalakhele	GHSS Nagrai	A.V.P
2	Ashpar Khan	GMS Dab	GHS Dewana baba	A.V.P
3 ✓	Shamsur Rahim	GMS Bimadara	GHSS Amnawar	A.V.P
4	Shahi Rooni	GHSS Bagra	GHSS Bagra	A.V.P
5	Haqrat Umar	GHSS Bagra	GHS Gokand	A.V.P
6	Ahmad Ghani	GHSS Agarai	GHSS Agarai	A.V.P
7	Muhammad Israr	GHS Sawawai	GHSS Ghurgushlo	A.V.P
8	Ghani Said	GHS Mugh Dara	GHS Dagai	A.V.P
9	Nasib Ahmad Jan	GMS Dandar	GHSS Ghurgushlo	A.V.P
10	Raf Ullah	GCMHS Daggar	GCMHS Daggar	A.V.P
11	Fazli Rahman	GHSS Gazikel	GHSS Totalai	A.V.P
12	Khurshed Jamil	GMS Maina Kawaja	GHS Nawagai	A.V.P
13	Saib Noor	GHS Hisar	GHS Daggar No.2	A.V.P
14	Muhammad Ali Khan	GHS Kalan	GHSS Totalai	A.V.P
15	Faz Muhammad	GHSS Agarai	GHSS Agarai	A.V.P
16	Fazlur Rahman	GHS Karapa	GHS Cheena	A.V.P
17	Muhammad Ali	GHS Jamra	GHSS Totalai	A.V.P
18	Shafiqur Rahman	GHS Sura	GHSS Jangai	A.V.P
19	Saeed Noor	GHS Hisar	GHS Elai	A.V.P

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Amjid Ali Khan	GHSS Chingali	GHSS Aqarai	A.V.P
Fazli Amin	GMS Kankowai	GHSS Jangai	A.V.P

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TERMS & CONDITIONS.

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

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

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

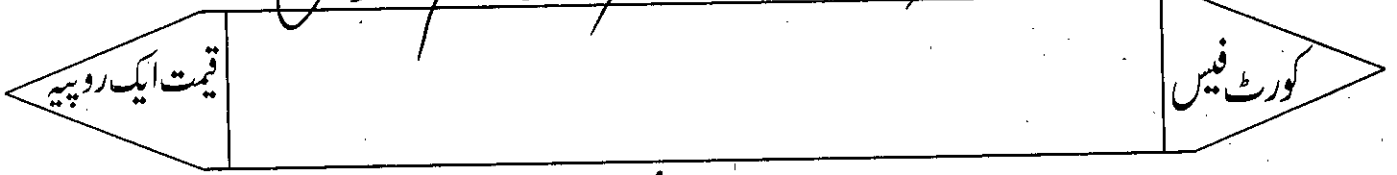
Copy forwarded for information and necessary action to the: -

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

DY; DISTRICT EDUCATION OFFICER (M)
DISTRICT BUNER

of-c

بعدالت خبر بخشتو خوا کسروس لریبول



۱۶ اپریل ۱۹۲۸ء پنجاب
محترم شاہ بنام گورنمنٹ و غیرہ

مورخہ

مقدمہ

دعویٰ

جرم

باعث تحریر آنکہ

مقدمہ مندرجہ بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کاروائی متعلقہ آن مقام کسروس لریبول سے کس ایسا ادا کرنے کو مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیاط ہوگا۔ نیز وکیل صاحب کو راضی نامہ و تقرر ثالث و فیصلہ پر حلف دینے جواب دی اور اقبال دعویٰ اور درخواست ہر قسم کی تصدیق زر اس پر دستخط کرنے کا اختیار ہوگا نیز بصورت عدم پیروی یا ڈگری ایک طرف یا اپیل کی برآمد ہوگی اور منسوخ ڈائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ بصورت ضرورت مذکور کے نسل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنی ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی جملہ مذکورہ بالا اختیارات حاصل ہونگے اور اسکا ساختہ برواختہ منظور و قبول ہوگا اور دوران مقدمہ میں جو خرچہ و ہر جانہ التوائے مقدمہ کے سبب سے ہا گا اسکے مستحق وکیل صاحب ہونگے۔ نیز بقایا و خرچہ کی وصولی کرتے وقت کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام دورہ ہر ہو یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہونگے کی پیروی مقدمہ مذکور لہذا وکالت نامہ لکھ دیا ک سند ہے

فہم شاہ دراز شاہ

۱۹۲۸

۶ ماہ اپریل

المرقوم

العبد گواہ شدہ العبد
کسروس لریبول کے لئے منظور ہے

Attest