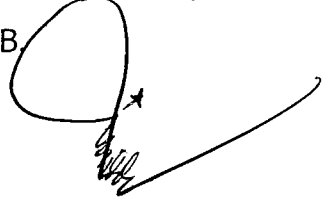


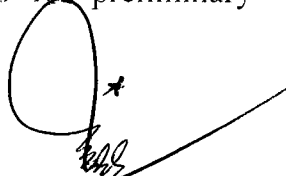
25.05.2022

Mr. Amad Nasir Kundi, Advocate junior of learned counsel for the appellant present and requested for adjournment on the ground that learned senior counsel for the appellant is not available today. Adjourned. To come up for preliminary hearing on 21.06.2022 before S.B.


(Mian Muhammad)
Member (E)

21.06.2022

Mr. Amad Nasir Kundi, Advocate junior of learned counsel for the appellant present and requested for adjournment on the ground that learned senior counsel for the appellant is busy in the august Peshawar High Court, Peshawar today. Adjourned. To come up for preliminary hearing on 09.08.2022 before S.B.


(Mian Muhammad)
Member (E)

9.8.2022 Due to The Public Holiday The
Case is Adjourned to 29-9-2022


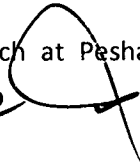
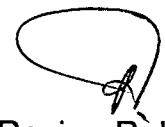

Reader.

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 381/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	15/03/2022	<p>The appeal of Hafiz Israr Ahmad resubmitted today by Mr. Mukhtar Ahmad Maneri Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-	11.04.2022	<p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put there on <u>11.04.2022</u></p> <p> CHAIRMAN</p> <p>Learned counsel for the appellant.</p> <p>He made a request for adjournment in order to prepare the brief of the case. Adjourned. To come up for preliminary hearing on 25.05.2022 before S.B.</p> <p> (Rozina Rehman) Member (J)</p>

The appeal of Hafiz Israr Ahmad S/O Hafiz Siyah Hosh, Presently posted as S.Qari at GHS Maneri Bala, District Swabi received today i.e. on 07.03.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

1. Memorandum of the appeal is unsigned which may be signed by the appellant.
2. Certificate be given to the effect that appellant has not been filed any service appeal earlier on the subject matter before this Tribunal.

No. 650 /S.T,


Dt. 10-3- /2022


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Mukhtar Ahmad Maneri Adv. Pesh.

Dear Sir,

The office objection are removed. The appeal may
Please be filed before the Honorable Court -


15.03.2022

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

APPEAL NO. 381 /2022

Hafiz Israr AhmadAPPELLANT

VERSUS

The Secretary (E&SE) Department & others
.....RESPONDENTS

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1.	Service Appeal		1 - 6
2.	Affidavit		7
3.	Addresses of Parties		8
4.	Copy of appointment order	A	9
5.	Copy of notification dated 29.10.2021	B	10 - 15
6.	Copy of departmental appeal of the appellant	C	16
7.	Copy of order dated 13.02.2020 and 2019	D & E	17 - 18
8.	Wakalat Nama		19

APPELLANT

THROUGH:

Mukhtar Ahmad Maneri
Advocate, Supreme court
of Pakistan

Ameed Nasir Kundi
&

Naseer ud din Yousafzai
Advocate, High court
Peshawar

Aqsa Nasir Mughal
Advocate, Peshawar

4 /

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

APPEAL NO. _____/2022

Hafiz Israr Ahmad S/o Hafiz Siyah Hosh, presently posted as
S.Qari at GHS, Maneri Bala, District Swabi.

.....APPELLANT

VERSUS

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

.....RESPONDENTS

**APPEAL UNDER SECTION-4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974
AGAINST THE IMPUGNED INACTION ON THE
PART OF RESPONDENT, WHEREBY THE
APPELLANT WAS NOT CONSIDERED FOR
PROMOTION FROM Sr.QARI (BPS-15) TO THE
POST OF S.S.T (MATHS/PHYSICS) (BPS-16).**

PRAYER:

That on acceptance of this appeal the respondents
may kindly be directed to consider the appellant for
promotion to the post of S.S.T (Maths/Physics)
BPS-16 w.e.f. his due dates.

R/SHEWETH:

- 1- That the Appellant is serving in the Elementary &
Secondary Education Department as Sr.Qari (BPS-15)
quite efficiently and up to the entire satisfaction of their

superiors. **(Copy of appointment order is attached as annexure A)**

- 2- That the appellant named above has moved an application alongwith his documents for promotion from S. Qari (BPS-15) to S.S.T (Maths/Physics) BPS-16 on account of defined quota for promotion because his documents were duly considered for promotion as such.
- 3- That to the utter surprise of the appellant the respondent named above did not consider the appellant for promotion being qualified and has issued the impugned notification No. 5133-38/File No. 5/Promotion of SST (BPS-16) dated Peshawar 29.10.2021. **(Copy of notification dated 29.10.2021 is attached as annexure B)**
- 4- That thereafter the present appellant preferred departmental appeal dated 11.11.2021 to the concern quarter through proper channel in respect of consideration for promotion on the basis of his due right but the respondent didn't pass any order on the appeal of the appellant, hence this appeal. **(Copy of departmental appeal of the appellant is attached as annexure C)**
- 5- That it is very pertinent to point out here that procedure and formula for promotion from BPS-15 to BPS-16 has duly been provided in the impugned notification dated

29.10.2021 for various categories. Total number of posts are 13 wherein 25% is reserved for initial recruitment quota, 75% for promotion quota and subsequently 75% promotion quota has further been bifurcated/classified details of which are as under;

i.	40% SCT/CT	=	(40% of 13 posts comes to 5.2 And 5 posts has been allocated)
ii.	20% PSHT/PST	=	(20% of 13 posts comes to 2.6 And 3 posts has been allocated)
iii.	4% SDM/DM	=	(4% of 13 posts comes to 0.52 And 1 post has been allocated)
iv.	4% SAT/AT	=	(4% of 13 posts comes to 0.52 And nil post has been allocated)
v.	4% STT/TT	=	(4% of 13 posts comes to 0.52 And nil post has been allocated)
vi.	3% S.Qari/Qari	=	(3% of 13 posts comes to 0.39 and nil post has been allocated)

6- That according to above mentioned allocation the present appellant was not only eligible but also qualified for the post of SST (Maths/Physics) BPS-16, but he was not promoted as such he was left with no option but to knock the door of this Hon'ble court through filing of the instant appeal.

7- That it is very pertinent to point here that the appellant has not been provided any reasons for not promoting him to the post of S.S.T (Maths/Physics) (BPS-16) and appellant was verbally told that since that percentage doesn't allow to promote the appellant but similarly placed/identical cases have been dealt with by the respondents department of education while promoting

one Mr. Nazeer Ahmad S.Qari to the post of S.S.T (Maths/Physics) having percentage of 0.39 vide notifications in respect of promotion bearing endorsement No. 920-24/Promotion SST dated Kohat 13.02.2020 and one Mr. Kashif Ali D.M was promoted to the post of SST (Bio-Chem) (BPS-16) having percentage of 0.32, while the present appellant has been discriminated, hence this appeal. **(Copy of order dated 13.02.2020 and 2019 are attached as annexure D & E respectively)**

8- That inaction on the part of respondent named above has left the present appellant with no option except to knock the door of this Hon'bel court, the following amongst other grounds;

GROUND:

A- That the acts of omission on the part of respondent named above while not promoting the appellant is against the law, facts and norms of natural justice.

B- That the Appellant have not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the constitution of Islamic Republic of Pakistan 1973.

C- That the action of the respondents is without any legal authority, discriminatory and in clear violation of

fundamental rights duly conferred by the Constitution and is liable to be declared as null and void.

D-That similarly placed employees have been promoted from BPS-15 to BPS-16 while the present appellant have been subjected to discrimination, hence the impugned inactions on the part of respondent are liable to be declared as illegal and the respondent department may kindly be directed to considered the present appellant for promotion from S.Qari/Qari BPS-15 to the post of S.S.T (maths/Physics) (BPS-16).

E- That although the appellant has preferred departmental appeal before the quarter concerned through proper channel but after passage of statutory period of 90 days no order of whatsoever nature has been passed as such the appellant was left with no option but to impugned the notifications dated 29.10.2021 and inactions on the part of respondents department before this Hon'ble tribunal for appropriation directions.

F- That valuable rights of the appellant has been violated by the respondents department while not promoting him as mentioned above, hence the respondents have deprive the appellant in a manner alien to the norms of justice.

G-That in identical cases the respondent department have promoted the employees and even the employee having

less marks then the appellant have been promoted but the present appellant have been subjected to discrimination, hence this appeal with the following prayer.

It is therefore, most humbly prayed that on acceptance of this appeal, this Hon'ble Tribunal may be pleased to direct the respondent department to consider and promote the appellant from S.Qari/Qari (BPS-15) to the post of S.S.T (Maths/Physics) BPS-16 with all back benefits w.e.f. his due dates

APPELLANT

THROUGH:

Mukhtar Ahmad Maneri
Advocate, Supreme court of
Pakistan

Ameed Nasir Kundi

Naseer ud din Yousafzai
Advocate, High court
Peshawar
&

Aqsa Nasir Mughal
Advocate, Peshawar

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

APPEAL NO. _____/2022

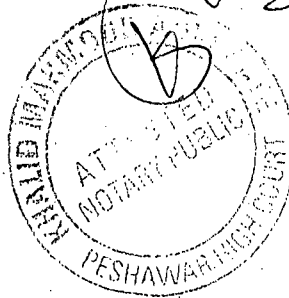
Hafiz Israr AhmadAPPELLANT

VERSUS

The Secretary (E&SE) Department & others
.....RESPONDENTS

AFFIDAVIT

I, Hafiz Israr Ahmad S/o Hafiz Siyah Hosh, R/o Mohallah Mir Ahmad Khel, Village Saleem Khan Tehsil & District Swabi, do hereby solemnly affirm and declare on oath that the contents of the accompanying Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



4-3 - 22/1/2022
DEPONENT

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

APPEAL NO. _____/2022

Hafiz Israr AhmadAPPELLANT

VERSUS

The Secretary (E&SE) Department & others
.....RESPONDENTS

ADDRESSES OF PARTIES

APPELLANT

Hafiz Israr Ahmad S/o Hafiz Siyah Hosh, presently posted as S.Qari at GHS, Maneri Bala, District Swabi.

RESPONDENTS

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

APPELLANT

THROUGH:

**Mukhtar Ahmad Maneri
Advocate, Supreme court of
Pakistan**

Ameed Nasir Kundi

**Naseer ud din Yousafzai
Advocate, High court
Peshawar
&**

**Aqsa Nasir Mughal
Advocate, Peshawar**

ORDER

Consentment upon the Notification issued vide Government of Khyber Pakhtunkhwa I & SE Department vide No. SO (M & A) 14/2019/SE/2019 and Notification No. SO (PE) 4-5/SSRC/Meeting /2012 teaching cadre. The following teachers recommended by the following Qaris (Male) BPS 12 are hereby promoted to Scale of BPS 15 Re. (16120-1370-56020) on the basis of 1/3rd ratio to the total vacancies posts of (Male) under jurisdiction of this office and adjusted against vacant S. Qari of BPS 15 as given below with immediate effect.

S/No	S#	Name of Teacher	Name of Present School	School where adjusted	Remarks
1	12	Touheed Jang S/O Bahadar Jang	GHSS Narajji	GHSS Ishmaila	Awarded BPS 15
2	13	Husam Ahmad S/O Rahmat Akbar	GHSS Sudher	GHSS Topi	Awarded BPS 15
3	14	Isam Ahmad S/O Siyah Hoshi	GHSS Swabi	GHSS Maheri Bala	Awarded BPS 15
4	15	Amin Ul Haq S/O Abdul Qudeem	GHSS Kala	GHSS Panj Pir	Awarded BPS 15

- Note
1. If any appeal received from any Qari regarding to his seniority. The Junior Most will be reverted to his original Scale i.e BPS 12.
 2. Necessary entries may be made in their Service book.
 3. An undertaking may be obtained from the concerned teachers that any discrepancy was found in the award of BPS 15 and overpayment made to them will be recovered from their pay gratuity and pension.

(NISAR MUHAMMAD)
DISTRICT EDUCATION OFFICER
(MALE) SWABI

Encl No. 8009-14 From File Dated / / 2019

Copy of the above is forwarded for information and necessary action to the:-

1. Director I & SE Khyber Pakhtunkhwa Peshawar.
2. District Accounts Officer Swabi
3. Principals/Head Masters Concerned
4. ADEO (Estab) Local Office.
5. EMIS Cell Local Office.
6. Officials concerned.

(Signature)
DISTRICT EDUCATION OFFICER
(MALE) SWABI
12/7/19

(Signature)
T.C

DISTRICT EDUCATION OFFICE (MALE) SWABI

ADJUSTMENT ORDER

Consequent upon the Notification issued vide Government of Khyber Pakhtunkhwa E& SF Department vide No. SO (B & A) I-8/E&SE/2012 dated 11-7-2012 and Notification No SO (PE) 4-5/SSRC/Meeting /2012 teaching cadre dated 13-11-2012 and recommended by the following Qaries (Male) BPS 12 are hereby promoted to Senior Qaries Posts BPS IS Rs. (16120-1330-560200) on the basis of 1/3rd ratio to the total vacant posts of S.Qari (Male) under jurisdiction of this office and adjusted against vacant S.Qari post BPS 15 as detail given below with immediate effect.

S/No.	S#	Name of Teacher	Name of present school	School where adjusted	Remarks
1.	12	Touheed Jang S/o Bahadar Jang	GHSS Naranji	GHSS Ismaila	Awarded BPS-15
2.	13	Hussain Ahmad S/o Raham Akbar	GHS Sudher	GHSS Topi	Awarded BPS-15
3.	14	Israr Ahmad S/o Siyah Hosh	GHS Swabi	GHS Maneri	Awarded BPS-15
4.	15	Amin Ul Haq S/o Abdul Qadeem	GHS kala	GHSS Panj Pir	Awarded BPS-15

Note:

1. If any appeal received from any Qari regarding to his seniority The Junior Most will be reverted to his original Scale i.e. BPS 12.
2. Necessary entries may be made in their Service book.
3. An undertaking may be obtained from the concerned teachers that any discrepancy was found in the award of BPS IS and overpayment made to them will be recovered from their pay gratuity and pension.

(NISAR MUHAMMAD)
DISTRICT EDUCATION OFFICER
(MALE) SWABI

Endst No 8009-14/ From: File Dated 12.07.2019

Copy of the above is forwarded for information and necessary action to the:

1. Director E & SE Khyber Pakhtunkhwa Peshawar,
2. District Accounts Officer Swabi.
3. Principals/Head Masters Concerned.
4. ADEO (Estab) Local Office.
5. EMIS Cell Local Office.
6. Officials concerned.

DISTRICT EDUCATION OFFICER
MALE SWABI

9
T-6



Promotion of SST of District Swabi

Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

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Notification

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.SO(B&A)/1-18/E&SI/2012 dated 11.7.2012 and Finance Department Endorsement No.SO(FR)/E/D/ 10-22(E)2010 dated 16.7.2012, the following CT/SCT, DM/SDM, AT/SAT, TT/STT and PSII/SPST/PST (Male) are promoted to the posts of SST (General), SST (Bio/Chem) and SST (Maths/Phy) in BPS-16 (Rs.18910-1520-64510) respectively, 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.

A. SST (General)

ITEM NO.1:- PROMOTION OF CT/SCT TO SST (G) BPS-16 ON REGULAR BASIS

Total No. of (Vacant) Post of SST(G)	21
25% Initial Recruitment Quota	05.25
75% by Promotion Quota	16.75
40% CT/SCT Promotion quota to SST(G)	8.93
Proposed CT/SCT for Promotion to SST(G)	07
Deferred CT/SCT for Promotion to SST(G)	01

S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular CT	Qualification	Remarks
1.	3	Javed Iqbal	GHS Swabi	10-05-1964	21-02-2013	BA, B.Ed	Services are placed at the disposal of DEO (M) Swabi for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
2.	21	Raz Muhammad	GHS Swabi	20-03-1969	21-02-2013	BA, B.Ed	Services are placed at the disposal of DEO (M) Swabi for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
3.	22	Sher Hayat Khan	GCMHS Marghuz	22-12-1962	21-02-2013	BA, B.Ed	Services are placed at the disposal of DEO (M) Swabi for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
4.	36	Muhammad Javed	GHS Swabi	01-10-1969	7-11-2014	BA, B.Ed	Services are placed at the disposal of DEO (M) Swabi for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
5.	37	Aminullah	GHS Serai	05-01-1966	07-11-2014	BA, B.Ed	Services are placed at the disposal of DEO (M) Swabi for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
6.	38	Shabbir Ahmad	GHS Mansabdar	07-02-1966	07-11-2014	BA, B.Ed	Services are placed at the disposal of DEO (M) Swabi for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

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Promotion of SST of District Swabi

39	Said Islam	GHISS Sheikh Jana	5-2-1967	07-11-2014	BA+B.Ed	Services are placed at the disposal of DEO (M) Swabi for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
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ITEM NO.2:- PROMOTION OF PST/SPST/PSHT TO SST (G) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(G)	21
25% Initial Recruitment Quota	05.25
75% by Promotion Quota	16.75
20% PST/SPST/PSHT to SST(G)	04.46
Proposed PST/SPST/PSHT for Promotion to SST(G)	04

S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular PST	Academic & Professional Qualification	Remarks
1.	86	Shahid Ali	GPS Rokhani	1-8-1970	6-10-1988	BA+B.Ed	Services are placed at the disposal of DEO (M) Swabi for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
2.	111	Muhammad Ishaq	GPS No.1 Zaida	23-3-1968	18-11-1989	BA+B.Ed	Services are placed at the disposal of DEO (M) Swabi for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
3.	169	Zia Ur Rahman	GPS No.2 Yaqubi	19-2-1967	9-12-1990	BA+B.Ed	Services are placed at the disposal of DEO (M) Swabi for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
4.	170	Alam Zeb	GPS Ghulam Muhammad Baba	02-03-1967	09-12-1990	BA+B.Ed	Services are placed at the disposal of DEO (M) Swabi for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

ITEM NO.3:- PROMOTION OF DM/SDM TO SST (G) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(G)	21
25% Initial Recruitment Quota	05.25
75% by Promotion Quota	16.75
4% DM/SDM Promotion quota to SST(G)	0.89
Proposed DM/SDM for Promotion to SST(G)	01

S.No	Sen#	Name of official/Desig:	Name of School	Date of Birth	Date of 1st Appointment as Regular DM	Academic & Professional Qualification	Remarks
	10	Sultan Javed	GHS Baja	10-04-1965	21-02-2013	BA, B.Ed	Services are placed at the disposal of DEO (M) Swabi for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

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Promotion of SST of District Swabi

ITEM NO.4:- PROMOTION OF AT/SAT TO SST (G) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(G)	21
25% Initial Recruitment Quota	05.25
75% by Promotion Quota	16.75
4% AT/SAT Promotion quota to SST(G)	0.89
Proposed AT/SAT for Promotion to SST(G)	01

S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular AT	Academic & Professional Qualification	Remarks
1	6	Ghulam Said	GHSS Tarakai	01-01-1965	21-2-2013	BA, B.Ed	Services are placed at the disposal of DEO (M) Swabi for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

ITEM NO.5:- PROMOTION OF TT/STT TO SST (G) BPS-16 ON REGULAR BASIS

The case of promotion of TT/STT to the post of SST (General) BPS-16 was considered and the DPC recommended as under:-

Total No. of Vacant Post of SST(G)	21
25% Initial Recruitment Quota	05.25
75% by Promotion Quota	16.75
4% TT/STT Promotion quota to SST(G)	0.89
Proposed TT/STT for Promotion to SST(G)	01

S.No	Sen#	Name of official/Desig:	Name of School	Date of Birth	Date of 1st Appointment as Regular TT	Academic & Professional Qualification	Remarks
1	10	Anwar Ali S.TT	GHSS Saleern Khan	01-01-1973	21-02-2013	BA, B.Ed	Services are placed at the disposal of DEO (M) Swabi for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

ITEM NO.6:- PROMOTION OF Qari/S Qari TO SST (G) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(G)	21
25% Initial Recruitment Quota	05.25
75% by Promotion Quota	16.75
3% Qari/Sr.Qari Promotion quota to SST(G)	0.67
Proposed Qari/Sr.Qari for Promotion to SST(G)	01

S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular Qari	Academic & Professional Qualification	Remarks
1	8	Muhammad Sarcer	GHS Hund	05-03-1980	11-2-2013	BA, B.Ed	Services are placed at the disposal of DEO (M) Swabi for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

Promotion of SST of District Swabi

SST (Bio/Chem)

ITEM NO.1:- PROMOTION OF CT/SCT TO SST (Bio/Chem) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(Bio/Chem)	05
25% Initial Recruitment Quota	1.25
75% by Promotion Quota	3.75
40% CT/SCT Promotion quota to SST(Bio/Chem)	02
Proposed CT/SCT for Promotion to SST(Bio/Chem)	2

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S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular CT	Academic & Professional Qualification	Remarks
1	210	Jamshad Khan	GHS Permoli	13-03-1975	22-07-2016	B.Sc+B.Ed	Services are placed at the disposal of DEO (M) Swabi for adjustment against the post of SST (Bio/Chem) BPS-16 on regular basis with immediate effect.
2	261	Arshad Ali	GHSS Kalu Khan	02-04-1980	22-07-2016	B.Sc+B.Ed	Services are placed at the disposal of DEO (M) Swabi for adjustment against the post of SST (Bio/Chem) BPS-16 on regular basis with immediate effect.

ITEM NO.2:- PROMOTION OF PSHT/SPST/PST to SST (Bio/Chem) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(Bio/Chem)	05
25% Initial Recruitment Quota	1.25
75% by Promotion Quota	3.75
20% PST/SPST/PSHT to SST(Bio/Chem)	01
Proposed PST/SPST/PSHT for Promotion to SST(Bio/Chem)	01

S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular PST	Academic & Professional Qualification	Remarks
1	563	Farooq Muhammad	GPS No.2 Seen Khel	10-4-1982	21-3-2011	B.Sc/B.Ed	Services are placed at the disposal of DEO (M) Swabi for adjustment against the post of SST (Bio/Chem) BPS-16 on regular basis with immediate effect.

C. SST (Maths/Phy)

ITEM NO.1:- PROMOTION OF CT/SCT TO SST (Maths/Phy) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(Maths-Phy)	13
25% Initial Recruitment Quota	03
75% by Promotion Quota	10
40% CT/SCT Promotion quota to SST(Maths-Phy)	05
Proposed CT/SCT for Promotion to SST(Maths-Phy)	05

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Promotion of SST of District Swabi

S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Apptt as Regular CT	Academic & Professional Qualification	Remarks
1.	276	Mushtaq Ahmad	GISS Ismaila	01-08-1971	27-02-2020	B.Sc+B.Ed	Services are placed at the disposal of DEO (M) Swabi for adjustment against the post of SST (Maths/Phy) BPS-16 on regular basis with immediate effect.
2.	99	Nisar Muhammad	GSBASHS Shewa	04-01-1969	16-05-2016	B.Sc+B.Ed	Services are placed at the disposal of DEO (M) Swabi for adjustment against the post of SST (Maths/Phy) BPS-16 on regular basis with immediate effect.
3.	109	Abdur Rasheed	GISS Sheikh Jana	10-01-1973	16-05-2016	B.Sc+B.Ed	Services are placed at the disposal of DEO (M) Swabi for adjustment against the post of SST (Maths/Phy) BPS-16 on regular basis with immediate effect.
4.	173	Ameer Muhammad	GHS Sudher	15-12-1974	22-07-2016	B.Sc+B.Ed	Services are placed at the disposal of DEO (M) Swabi for adjustment against the post of SST (Maths/Phy) BPS-16 on regular basis with immediate effect.
5.	245	Sher Khan	GHS No.2 Yar Hussain	5-1-1977	22-7-2016	B.Sc+B.Ed	Services are placed at the disposal of DEO (M) Swabi for adjustment against the post of SST (Maths/Phy) BPS-16 on regular basis with immediate effect.

ITEM NO.2:- PROMOTION OF PSHT/SPST/PST to SST (Maths/Phy) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(Maths/Phy)	13
25% Initial Recruitment Quota	03
75% by Promotion Quota	10
20% PST/SPST/PSHT to SST(Maths/Phy)	03
Proposed PST/SPST/PSHT for Promotion to SST(Maths/Phy)	03

S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular PST	Academic & Professional Qualification	Remarks
1.	407	Muhammad Ishtiaq	GPS No.2 Yar Hussain	16-2-1972	8-5-1995	BSc+B.Ed	Services are placed at the disposal of DEO (M) Swabi for adjustment against the post of SST (Maths/Phy) BPS-16 on regular basis with immediate effect.
2.	462	Manzar Ali	GPS No.4 Turlandi	13-4-1973	24-4-1998	BSc+B.Ed	Services are placed at the disposal of DEO (M) Swabi for adjustment against the post of SST (Maths/Phy) BPS-16 on regular basis with immediate effect.

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Promotion of SST of District Swabi

1.	467	Munsif Ali Gohar	GPS Semt Dault	22-4-1970	24-4-1998	BSc+B.Ed	Services are placed at the disposal of DEO (M) Swabi for adjustment against the post of SST (Maths/Phy) BPS-16 on regular basis with immediate effect.
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ITEM NO.3:- PROMOTION OF DM/SDM to SST (Maths/Phy) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(Maths/Phy)	13
25% Initial Recruitment Quota	03
75% by Promotion Quota	10
4% DM/SDM Promotion quota to SST(Maths/Phy)	01
Proposed DM/SDM for Promotion to SST(Maths/Phy)	1

S.No	Serial	Name of official/Design	Name of School	Date of Birth	Date of 1st Appointment as Regular DM	Academic & Professional Qualification	Remarks
1	44	Gohar Ali	GHS.No.1 Yar Hussain	03-03-1972	01-08-2017	B.Sc+B.Ed	Services are placed at the disposal of DEO (M) Swabi for adjustment against the post of SST (Maths/Phy) BPS-16 on regular basis with immediate effect.

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 proceeded 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 the duty.
- 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 this order, will be recovered and if they are wrongly promoted, they will be reversed.
- 8 Before handing over charge, their documents may be checked. If they have not the required relevant qualification as per rules, they may not be handed over the charge of the post.

(Hafiz Dr. Muhammad Ibrahim)

Director

Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst: No ~~5133-38~~ / File No.5/Promotion of SST(BPS-16)Dated Peshawar the: 29/10/2021

Copy forwarded for information and necessary action to the:-

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

Deputy Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

بخدمت جناب سیکرٹری ایجوکیشن صوبہ خیبر پختونخواہ

محترم و مکرم جناب عالی!

مؤربانہ گزارش کی جاتی ہے کہ

میں حافظہ اسرار احمد بطور S. Qari کی اپنی خدمات G.H.S مانیری بالا (صوابی) میں سرانجام دے رہا ہوں۔ میری کوالیفیکیشن M.Sc Physics ہے ڈیپارٹمنٹل پروموشن برائے SST میں ہمارا 3% کوٹہ ہے۔ گزشتہ DPC جو 01/09/2021 کو ہوئی تھی، اُس میں SST (M/P) کے کل 13 پوسٹیں تھیں۔ یہ 25% Percentage کوٹہ اوپن اور 75% کوٹہ ڈیپارٹمنٹل ہے۔ 25% اوپن کوٹہ کے مطابق 3.25 پوسٹیں اوپن کے حصے میں آئی۔ اور 75% ڈیپارٹمنٹل کوٹہ کے مطابق 9.75 پوسٹیں ڈیپارٹمنٹ کے حصے میں آئی۔ یعنی 3 پوسٹیں اوپن اور 10 پوسٹیں ڈیپارٹمنٹ کے ہوئے۔ ان 10 پوسٹوں میں 4% کوٹہ کے مطابق 5 پوسٹیں CT کے حصے میں آئے۔ 20% کوٹہ کے مطابق 2.0 یعنی 3 پوسٹیں PST کے حصے میں آئے۔ 4% کوٹہ کے مطابق 0.5 یعنی 1 پوسٹ DM کے حصے میں آیا۔ AT&TT کا بھی 4% اور 4% کوٹہ ہے۔ لیکن اُس میں کوئی BSC (M/P) والا نہیں تھا۔ اس لئے 3% کوٹہ برائے قاری کے مطابق یہ ایک پوسٹ چھو رہی ہے۔ چونکہ 10 پوسٹوں میں 3% کے مطابق میرا پرنسٹنٹ 0.4 بنتا ہے۔ اس لئے چھو اس پوسٹ سے محروم کیا گیا۔ گزشتہ D.P.C کی طرح جو 2014ء اور 2016ء میں ہوئی تھی، اب اس ایک حالی پوسٹ کنڈکٹ سے بے نیازہ مقدار میں بیوں۔ اس لئے آپ صاحبان مہربانی فرما کر یہ ایک پوسٹ چھو رہی ہے۔

Forwarded to the DGP (M) Swabi for n/a pl.

HEAD MASTER
GHS Maneri Bala
Swabi

S. Qari
قاری اسرار احمد 4173 مانیری بالا خیبر پختونخواہ

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NOTIFICATION

... Committee and on first...
... No. 22528 File No. 22528
... (Rs. 1800-1720-01510)

AY SST (MATHS/PHY)

PROMOTION OF SQUARE CARE TO THE POST OF SST (MATHS/PHY)

Name of Official: ...
Present Place of Posting: ...

TERMS & CONDITIONS:

- 1. It will be on probation for a period of ...
- 2. It will be governed by statements and ...
of the Government.
- 3. His services can be terminated if ...
unsatisfactory ...
- 4. ... report ...
- 5. ...
- 6. ...
- 7. ...
- 8. It will be governed by such rules ...
time by government.
- 9. Before taking over charge once again his ...
the required relevant qualifications ...
of the post

Ends No. 920-24 ...

- 1. Copy of the above is forwarded to ...
- 2. Director Elementary & Secondary Education
- 3. District Controller of Accounts
- 4. Principals / Headmasters Concerned
- 5. Teachers Concerned
- 6. M/ File.

Handwritten signatures and initials at the bottom right of the page.

**OFFICE OF THE DISTRICT EDUCATION OFFICE
(MALE) KOHAT**

NOTIFICATION:

Consequent upon the recommendation of the departmental provision committee and in pursuance of the Govt. of Khyber Pakhtunkhwa elementary and secondary education Notification No. (BS-A/187/E&S dated 11.07.2012. Finance Department Endst No. ___ dated 16.07.2012 and Director Elememetary & secondary education Khyber Pakhtunkhwa Peshawar Endst No. 2523-28/File No. 1/promotion S8IT8(6) dated Peshawar the 08.02.2020, the following Qari is hereby promoted to the post of SST (Maths/Phy) in BPS-16 (Rs. : 18910-1520-64510) plus usual allowance as admissiable against the basis on regular basis under the existint policy of the provincial govt. on the terms and condition given below with immediate effect and further adjusted against in the school mentioned against each.

A). SST (Maths/Phy)

1. **PROMOTION OF S.QARI/QARI TO THE POST OF SST (MATHS/PHY)
BPS-16**

S#	Name of official	Present place of posting	Adjusted at	Remarks
1.	Nazir Ahmad Khan	GHS Totaj Jadeed Kohat	GHSS Billitang Kohat	A.V Post

Terms & Conditions:

1. He would be on probation for a period of one year extended for another one year.
2. He will be governed by such rules and regulation as may be issued from time to time by the government.
3. His services can be terminated at any time 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. His inter-se-seniority will remain intact.
6. No TA/DDA etc is allowed for joining his duty.
7. He will give an undertaking to be recorded in his service book to the effect that if any overpayment is made to him In light of this order will be recovered and if he is wrongly promoted he will be reversed.
8. He will be governed by such rules and regulation as may be issued form time to time by government.
9. Before taking over charge once again his documents may be checked if he has not the required relevant qualification as per rules. He may not be handed over charge of the post.

DISTRICT EDUCATION OFFICER

(MALE) KOHAT

Endst; No. 920-24/Promotion SST

Dated kohat the 13.02.2020

Copy of the above is forwarded for information and necessary action to the:

1. Director Elementary & Secondary education Khyber Pakhtunkhwa Peshawar
2. District Controller of Accounts, Kohat
3. Principals/Headmasters concerned.
4. Teachers concerned
5. M/File.

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18 "E"

DIRECTORATE OF ELEMENTARY AND SECONDARY
EDUCATION KHYBER PAKHTUN KHAWA PESHAWAR

Substituted With Even No & Date

Notification

Consequent upon the recommendation of the Department of Promotion of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education vide G.O. No. 18/1/AS/2012 dated 11.7.2012 and Finance Department vide G.O. No. 16/1/2012 dated 16.7.2012, the following S.C.T. (Phy/Maths) and S.O. (Phy/Maths) (BPS-16(Rs.18910-1520-15110) respectively, plus usual allowances on regular basis under the existing policy of the Provincial Government, are hereby approved with immediate effect, and further they will be adjusted by the District Education Officer.

Promotion to SST (Phy/Maths)

ITEM No.1 PROMOTION OF SCT/CT MALE TO THE POST OF SST (PHY/MATHS) ON REGULAR BASIS

1. No. of Vacant Post of SST (Phy/Maths)	13
2. No. of recruitment of SST (Phy/Maths)	13
3. Promotion quota of SST (Phy/Maths)	13
4. SCT/CT Quota to SST (Phy/Maths)	5
5. S.O. (Phy/Maths)	5
6. S.I.T. (Phy/Maths)	13
7. S.I.T. (Phy/Maths)	13
8. S.I.T. (Phy/Maths)	13
9. S.I.T. (Phy/Maths)	13
10. S.I.T. (Phy/Maths)	13
11. S.I.T. (Phy/Maths)	13
12. S.I.T. (Phy/Maths)	13
13. S.I.T. (Phy/Maths)	13
14. S.I.T. (Phy/Maths)	13
15. S.I.T. (Phy/Maths)	13
16. S.I.T. (Phy/Maths)	13
17. S.I.T. (Phy/Maths)	13
18. S.I.T. (Phy/Maths)	13
19. S.I.T. (Phy/Maths)	13
20. S.I.T. (Phy/Maths)	13
21. S.I.T. (Phy/Maths)	13
22. S.I.T. (Phy/Maths)	13
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24. S.I.T. (Phy/Maths)	13
25. S.I.T. (Phy/Maths)	13
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97. S.I.T. (Phy/Maths)	13
98. S.I.T. (Phy/Maths)	13
99. S.I.T. (Phy/Maths)	13
100. S.I.T. (Phy/Maths)	13
Proposed SCT /CT for Promotion to SST (Phy/Maths)	2

Sr	Sl No	Name of Official	Name of School	Date of Birth	Date of Apptt: as Regular CT	Qualification	Remarks
1	329	Muhammad Mohsiri	GHS Pir Shahi Kohat	20.12.1987	20.2.2013	MA, BSc (Phy/Maths) B.Ed	Services of DEOI adjusted to SST (Phy/Maths)

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**DIRECTORATE OF ELEMENTARY AND SECONDARY
EDUCATION KHYBER PAKHTUNKHWA PESHAWAR**

Substituted with even No. & date.

Notification:

Consequent upon the recommendation of the department promotion pursuance of the government of Khyber Pakhtunkhwa Elementary and secondary Education No. 1/18/E&SE/2012 dated 11.07.2012 and Finance Department Endorsement dated 16.07.2012, the following SCT/CT and S.Qari (Male) are promoted (Physics/Maths) in BPS-16 (Rs. 18910-1520-64510) respectively, plus usual allowances as on regular basis under the existing policy of the provincial government, on the terminal below with immediate effect, and further they will be adjusted by the District Education Officer.

Promotion to SST (Phy/Maths)

Item No. 1 PROMOTION OF SCT/CT MALE TO THE POST OF SST (PHY/MATHS) REGULAR BASIS.

Total No. of vacant post of SST (Phy/Maths)	13
25% initial recruitment of SST (Phy/Maths)	25
75% promotion quota of SST (Phy/Maths)	10
40% SCT/CT Quota to SST (Phy/Maths)	5.2
20% PSHT/SPST/PST	3.6
4% SDM/DM	0.52
4% SAT/AT	0.52
4% STT/TT	0.52
3% S.Qari/Qari	0.39
Proposed SCT/CT for promotion to SST (Phy/Maths)	2

S #	SR #	Name of official	Name of School	Date of birth	Date of Apptt: as regular CT	Qual:	Remarks
1	329	Muhammad Mohsin	GHS Pir Shahi Kohat	20.12.1987	26.2.2013	MA, BSc (Phy/Maths) B.Ed	Services of DEO (Male) adjustment SST (P/M) basis

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VAKALATNAMA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

APPEAL NO. _____/2022

Hafiz Israr AhmadAPPELLANT

VERSUS

The Secretary (E&SE) Department & others
.....RESPONDENTS

I/We _____ the _____ in the above
_____ do hereby appoint MR. MUKHTAR AHMAD MANERI, ADVOCATE
SUPREME COURT OF PAKISTAN, AMAAD NASIR KUNDI AHC, NASEER UD DIN YOUSAFZAI
AHC, AQSA NASIR MUGHAL, ADVOCATE to appear and act for me/us in the above mentioned
proceedings and to conduct, prosecute and/or defend and/or compromise the same and any other
proceedings that may arise out of or be connected with the same, with full power and authority to
sign all necessary pleadings, petitions, applications papers and documents, to pay all proper fees
and costs, to file and withdraw all documents and to apply for and receive payment of all moneys that
may be or become due and payable to me/us during the course or after the completion or conclusion
of the said proceedings, and to settle, compromise or to withdraw the said proceedings.

Received on 04/03/2022 from Appellant

Israr Ahmad
Signature

Hafiz Israr Ahmad

Accepted.

[Signature]

ADVOCATE

ADVOCATE

ADVOCATE

ADVOCATE

Mukhtar Ahmad Maneri & Associates
Advocates & Legal Consultants