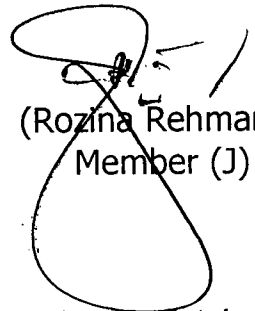


15.04.2021

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

Points raised need consideration. Instant appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notice be issued to respondents for submission of written reply/comments. To come up for reply/comments on 07.07.2022 before S.B.

Rs-700/-
deposited
process fee
A. Aff. in
15/4/22


(Rozina Rehman)
Member (J)

07th July, 2022

Appellant present in person. Mr. Muhammad Adeel Butt, Addl. AG for the respondents present.

Respondents have not submitted reply/comments. Learned AAG seeks adjournment. Last opportunity is granted. Appellant submitted an application for the correction of the heading of Service Appeal. Notice of application be given to the respondents. To come up for written reply/comments on main appeal as well as reply/arguments on the application on 12.09.2022 before S.B.




(Kalim Arshad Khan)
Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 550 /2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	14/04/2022	<p>The appeal of Mr. Hidayatullah presented today by Mr. Hidayat-ur-Rehman Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR,</p>
2-		

BEFORE THE KYBER PAKHTUNKHAW SERVICE

TRIBUNAL, PESHAWAR

Hidayat Ullah

VERSUS

Appeal no-550/22

Government of Khyber Pakhtunkhwa and others.

INDEX

S.No	Descriptions of Documents	Annexure	Page
1	Memo of Appeal and Affidavit		1-6
2	Copy of CNIC and Pay slip	"A"	
3	Copy of the appointment order	"B"	9
4	Copy of Notification of Promotion dated 18-04-2014 from AT to SATs	"C"	10-11
5	Copy of Check list for Departmental Promotion and the case of promotion	"D"	12-14
6	Copy of Application/Appeal Dated: 24/11/2021	"E"	15
7	Copy of Recommendation letter/ Appeal	"F"	16
8	Copy of application dated 24/03/2022	"G"	17
9	Copy of promotion Notification of Upper Chitral Teachers	"H"	18-21
10	Copy of the promotion Notification of Dir Upper Teachers	"I"	22-28
11	Copy of the Rules regarding the promotion	"J"	29-40
12	Notices to Respondents		
13	Wakalatnama		

Through

Appellant

Hidayat Ullah
HIDAYAT ULLAH
Advocate High Court

(1)

**BEFORE THE KYBER PAKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR**

Service Appeal No. 550/2022

Hidayat ullah S/o Sharafud Din R/o Village
Warijun Mulkhow P/O Drasun, Tehsil
Mulkhow Torkhow, District Chitral Upper
Currently Serving at Government High School,
Warijun Chitral Upper.

..... Appellant

VERSUS

- 1) Government of Khyber Pakhtunkhwa,
Through Chief Secretary, Civil Secretariat,
Peshawar.
- 2) Secretary Education Khyber Pakhtunkhwa,
Civil Secretariat, Peshawar.
- 3) Director of Education (Male) Khyber
Pakhtunkhwa, Peshawar.
- 4) Director, Elementary & Secondary
Education Department (Establishment),
Khyber Pakhtunkhwa, Peshawar.
- 5) District Education Officer (Male) District
Chitral Upper Booni.

..... Respondents

**SERVICE APPEAL U/S 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT,
1974 AGAINST THE IMPUGNED ORDER DATED
30.11.2021 WHEREBY, THE DEPARTMENTAL
APPEAL OF THE APPELLANT DATED
09.03.2021 REGARDING THE PROMOTION OF
THE APPELLANT HAS BEEN REJECTED.**

Respectfully Sheweth: -

- 1) **That** the appellant belongs to a respectable and religious family of District Chitral Upper and holds a Degrees / Sanads of Shahadat ul Alia Fil Uloom ul Islamia Wal Arabia (Bachelor of Arts) and also hold Shahadat ul Alamia Fil Uloom ul Islamia Wal Arabia from Rbitat ul Madaris Arabia, Pakistan (MA).

(Copy of CNIC and Pay slip are attached herewith marked "A").

- 2) **That** on the basis of his qualification, the appellant done his MA (Arabic), Bachelor of Education and S-Alimia Degree.
- 3) **That** on the same qualification mentioned in para-1 & 2, the appellant was appointed by the Executive District Officer (Establishment) & Secondary Education District Chitral on 05.10.2004 as Arabic Teacher BPS-9.

(Copy of the appointment order is attached herewith marked "B").

- 4) **That** currently, the appellant is working as Senior Arabic Teacher (BPS-16) in Government High School (Male) Warijun, District Upper Chitral.

(Copy of Notification of Promotion dated 18-04-2014 of Appellant from Arabic Teacher to Senior Arabic Teacher (AT to SAT) is attached herewith marked "C")

- 5) **That** on 16-08-2021, the present Appellant preferred an appeal to the concern District Education Officer (Male) Chitral Upper (Respondent No. 5) for his promotion. Pursuant to the appeal Respondent No. 5 has constituted a promotion committee to consider the case of the Appellant. The committee after going through the entire record of the Appellant and recommend him for the post of SST General. Whereas the promotion committee under the supervision of Director Elementary and Secondary Education,

Peshawar deferred the same because of the reason best known to them.

(Copy of Check list for Departmental Promotion and the case of promotion is attached herewith marked "D")

- 5) That on 24-11-2021 the Appellant again preferred an Appeal before the Respondent No. 5 for his promotion and on 07/02/2022 the committee for promotion to SST (G) recommended again the Appellant and forwarded the Appeal for further necessary action and to promote the Appellant to the post of SST (G) but Respondent No. 3 is reluctant to promote the Appellant to the post of SST General, despite having 0.88% total share of AT/SATs for promotion to the post of SST (G) reserved, On the other hand, the Respondents have promoted candidate of other cadres having less than 0.88% total share.

(Copy of Application/Appeal Dated: 24/11/2021 is attached herewith marked "E")

- 6) That time and again the Respondents have deliberately and intentionally deferred the case of Appellant without any plausible and cogent reason. That it is also pertinent to mention here that no any teacher has been promoted from the Appellant cadre through the DPC conducted during 2019, 2020 & 2021, However the name of the Appellant was recommended by the committee for promotion to SST (G) post during the DPC meeting conducted on 01/09/2021 but the Appellant name has not been included in the notification by Respondent no 3.

(Copy of Recommendation letter/ Appeal are Attached as "F")

- 7) That feeling aggrieved from, the appellant filed reminder application on 24-03.2021 for getting information about the decision on appeal filed by present appellant. but so far the respondent no 4 has not provide the details of order to appellant, hence feeling aggrieved from, the appellant

approached this Hon'ble Tribunal/Forum for redressal of his grievances, inter-alia on the following amongst other grounds: -

(Copy of application dated 24/03/2022 is attached as Annexure "G")

GROUND

- A. That the deferring of Appellant from his due promotion is against the law, facts and against the rules and regulations, without lawful authority thus liable to be set aside.

(Copy of promotion Notification of Upper Chitral Teachers is attached herewith marked "H")

- B. That deferring of the appellant from his due promotion which was based on seniority-cum-fitness is against the policy and law given by the Higher Education Commission in the year 2011 and in the year 2017 and also against the numbers of judgments of apex court of Pakistan. Needless to mention here that on same criteria the respondents have promoted other teachers who are belonging to District Dir.

(Copy of the promotion Notification of Dir Upper Teachers is attached herewith marked "I").

- C. That it is also worth perusal and required consideration that rules are also supporting the stance of appellant, hence the deferring order of Respondent no 3 the appellant from the list of promotion is against the fundamental rights of the appellant which is sheer violation of fundamental right, rules and regulation protected under the law and procedure.

(Copy of the Rules regarding the promotion is attached herewith marked "J").

- D. That the respondents are badly failed to follow the law, rules and regulation and astonishingly the promotion policy is further violated as the appellant is holding the due qualification, but the impugned order is also violation of laid down polices, hence invites consideration of this Hon'ble Tribunal.

(5)


- E.** That the present appeal is well within time and this Hon'ble Tribunal may entertain this appeal under the law.
- F.** That the impugned order of the respondents without adopting proper criteria and codal requirements by the respondents is against the worthy ruling of the Hon'ble Superior Courts of Pakistan and therefore, the same is illegal practice and such practice adversely affects efficiency of incumbents and also reduces their confidence and faith in public, hence the impugned order and deferring the appellant from his promotion are liable to be un-held on this score also.
- G.** That any other ground which has not been specifically mentioned will be agitated at the time of arguments with kind permission of this Hon'ble Tribunal.

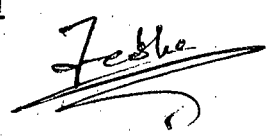
It is, therefore, humbly prayed that, on acceptance of the instant appeal may be pleased to;

- i.** Declare the impugned order and deferring the appellant from the list of promotion by the respondents as illegal, unlawful, without lawful authority and void ab-initio and to be set-aside.
- ii.** Direct the respondents to promote the appellant from SAT to SST (G) as per the first promotion list with all back benefits from the year 2021
- iii.** Any other relief may also kindly be granted in the circumstances of the appellant's case.

Appellant

Through


HIDAYAT UR REHMAN
Zeshan Ahmad
Advocate High Court(s)



Dated: 12.04.2022

(6)

**BEFORE THE KYBER PAKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR**

Hidayat Ullah

VERSUS

Government of Khyber Pakhtunkhwa and others

AFFIDAVIT

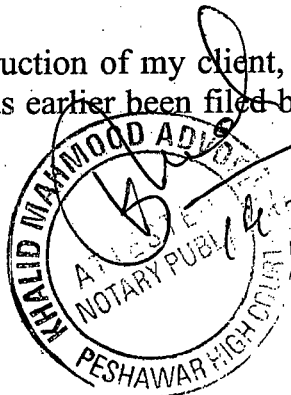
I, Hidayat Ullah S/o Sharafud Din R/o Village Warijun Mulkhaw Tehsil Mulkhaw Torkhow, District Chitral Upper currently serving at Government High School, warijun Chitral Upper (Appellant), do hereby affirm and declare on oath that the contents of accompanying Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble court.

Hidayat
Deponent

CNIC# 15201-0565749-9
CELL# 0340-9863540

CERTIFICATE

As per instruction of my client, it is certified that no such like Service Appeal has earlier been filed before this Hon'ble Tribunal on the subject matter.



Advocate
Advocate

(7)

Annexure 'A'

Dist. Govt. KP-Provincial
District Accounts Office Chitral Upper
Monthly Salary Statement (March-2022)



Personal Information of Mr HIDAYAT ULLAH d/w/s of SHARFUD DIN

Personnel Number: 00321980 CNIC: 1520105657499 NTN:
 Date of Birth: 11.11.1973 Entry into Govt. Service: 05.10.2004 Length of Service: 17 Years 05 Months 028 Days

Employment Category: Vocational Temporary

Designation: SENIOR ARABIC TEACHER 80997883-DISTRICT GOVERNMENT KHYBE

DDO Code: CU6076-Head Master GHS Warijun

Payroll Section: 001 GPF Section: 001 Cash Center:

GPF A/C No: 321980 GPF Interest applied **GPF Balance: 587,465.00 (provisional)**

Vendor Number: -

Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 16 Pay Stage: 15

Wage type		Amount	Wage type		Amount
0001	Basic Pay	41,710.00	1001	House Rent Allowance 45%	4,091.00
1210	Convey Allowance 2005	5,000.00	1300	Medical Allowance	1,500.00
1918	UAA-CHITRAL 40%(16 G/NG)	3,000.00	2148	15% Adhoc Relief All-2013	820.00
2199	Adhoc Relief Allow @10%	556.00	2211	Adhoc Relief All 2016 10%	2,868.00
2224	Adhoc Relief All 2017 10%	4,171.00	2247	Adhoc Relief All 2018 10%	4,171.00
2264	Adhoc Relief All 2019 10%	4,171.00	2309	Adhoc Relief All 2021 10%	4,171.00
2316	Teaching Allowance 2021	3,782.00			0.00

Deductions - General

Wage type		Amount	Wage type		Amount
3016	GPF Subscription	-3,340.00	3501	Benevolent Fund	-1,500.00
3609	Income Tax	-1,541.00	3990	Emp.Edu. Fund KPK	-150.00
4004	R. Benefits & Death Comp:	-650.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 17,731.85 Recovered till MAR-2022: 13,110.00 Exempted: 0.25- Recoverable: 4,622.10

Gross Pay (Rs.): 80,011.00 Deductions: (Rs.): -7,181.00 Net Pay: (Rs.): 72,830.00

Payee Name: HIDAYAT ULLAH

Account Number: 10090001645201

Bank Details: HABIB BANK LIMITED, 221009 DRASUN, MULKHOW CHITRAL. DRASUN, MULKHOW CHITRAL., CHITRAL

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: CHITRAL

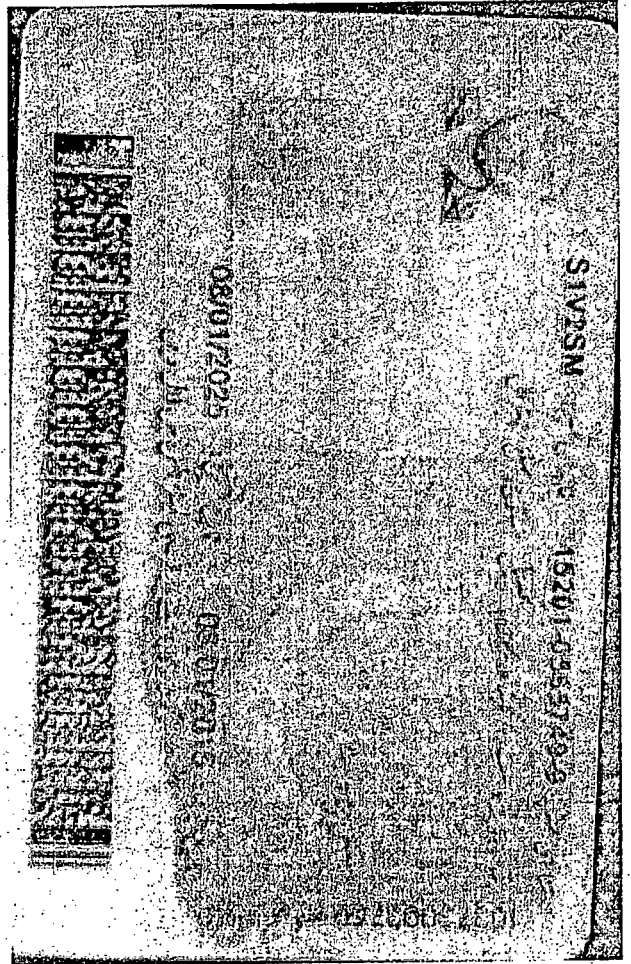
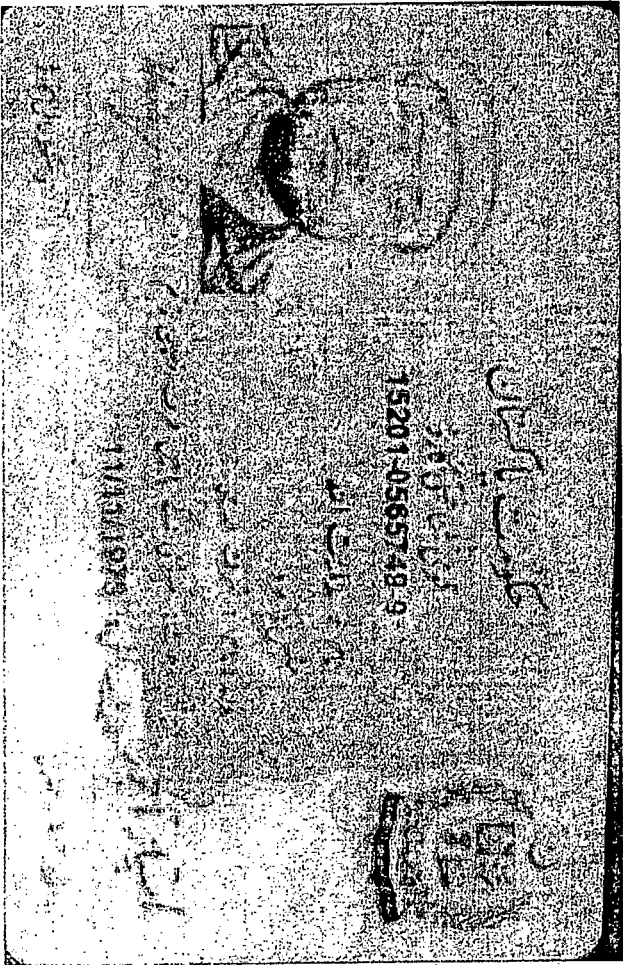
Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email: hidayatullah.ct11980@gmail.com



Amexare 1/1

182

1/1

OFFICE OF THE EXECUTIVE DIRECTOR OF THE DISTRICT OF COLUMBIA

Contract for repair their school by the District School Commission and approval of the contract basis with effect from their taking over charge in the best interest of public service subject to the terms and conditions noted herein.

S.No.	Name of the Candidate	Roll No.	Mark Score	Living Station	Remarks
1	Shah R/O Shah R/O	33.01		GMS Madhwal	A.V. AT Post
2	Shah R/O Shah R/O	33.70		GMS Madhwal	
3	Shah R/O Shah R/O	33.89		GMS Madhwal	
4	Shah R/O Shah R/O	41.33		GMS Madhwal	
5	Shah R/O Shah R/O	41.39		GMS Madhwal	
6	Shah R/O Shah R/O	49.41		GMS Madhwal	
7	Shah R/O Shah R/O	49.42		GMS Madhwal	

TERMS & CONDITIONS:

10. The appointment is purely contract & they are liable to termination at any time without notice.
11. They will be governed by such regulations issued by the Govt. from time to time.
12. They should produce health & age certificate from MS (M) Hospital (Muz).
13. They should sign contract agreement before taking over charge.
14. Charge report should be submitted to all concerned.
15. They should take over charge within 5 days.
16. They should accept all liabilities which will be incurred from the concerned Govt.
17. They should not be handed over charge if their age exceeds 48 years.

Director of Education
District Office
Muz

Ends No. 9639-40
Application dated 05/10/2004

Copy of the above is forwarded to the

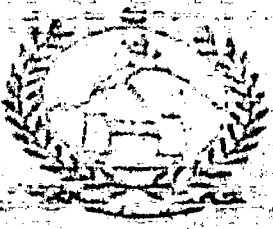
1. Director of Education & Training, District Office, Muz
2. District Education Officer, District Office, Muz
3. District Education Officer, District Office, Muz
4. District Education Officer, District Office, Muz
5. District Education Officer, District Office, Muz
6. District Education Officer, District Office, Muz
7. District Education Officer, District Office, Muz
8. District Education Officer, District Office, Muz
9. District Education Officer, District Office, Muz
10. District Education Officer, District Office, Muz

Signature
Date

(10)

ATs (M) Chitral IV

Amexure C



**Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar**

PH No. 091-9210389, 9210938,
9210437, 9210957, 9210468
Fax No. 9210936, 9210-23852
E-mail: info@e-s-e.gov.pk

Notification

Consequent upon the re-organization of the Departmental Promotions Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Regulations 2013 dated 10.09.2013 and Finance Department Enforcement No. 02/R/110/10-20/2010 dated 10.09.2012, the following Male ATs B-15 are hereby promoted to the post of Senior AT BPS-16 (Rs 16000-500-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Government, in working Cadre on the terms and conditions prescribed with immediate effect and forthwith they will be posted to the Government Higher Secondary High Schools by the District Education Officers concerned in terms of the newly upgraded Senior AT as per below:

Total No. of AT (M) Posts verified by the DAO	116
1/3 share of Senior AT Posts	39
Share of promotion 100%	39
Already Promoted to the post of Senior AT B-16 and working	33
Posts available for promotion	06
Promoted to the post of Senior AT B-16	06

S-	Seniority No.	Name	Place of posting	Date of Birth	Remarks
1	1	Muhammad ul-Haq	GAO, W. Peshawar	19/11/73	5 years placed at the disposal of Govt of Khyber Pakhtunkhwa

- They would be on probation for a period of one year extendable for another one year.
- They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- Their services may be terminated at any time, in case the performance is found unsatisfactory during probationary period. In case of misconduct, he shall be proceeded under the rules framed from time to time.
- Qualifications should be submitted to all concerned.
- There is Inter-Seniority on other post will remain intact.
- No TA/DA is allowed for joining his duty.
- 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 of this order will be recovered and if he is wrongly promoted he will be averse.

(Muhammad Raza Khattak)
Director

Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Encl. 1. No. / Pdt. No. 1/ Promotion Senior AT B-16: Dated Peshawar the 18/01/2014

- 2. Accounts General Audit - Peshawar
- 3. District Education Officer - Peshawar
- 4. District Accounts Officer - Peshawar
- 5. Official Concerned
- 6. PS to the Secretary to Govt. Khyber Pakhtunkhwa ESSE, Peshawar
- 7. PS to the Director ESSE, Peshawar
- 8. At/ File

By: (Signature)
Director, Elementary and Secondary Education

(11)

Annexure C
(Better copy)

ATs (M) Chitral

Directorate of Elementary and Secondary Education

Khyber Pakhtunkhwa Peshawar

PH.NO, 091-9210389, 9210938

9210437, 9210937, 9210968

Fax 091-9210936, 0800-33857

E-mail rafiq_kk851@yahoo.com

Notification.

Consequent upon the recommendation of the Departmental promotion committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education SO (FR)/FD/10-22(R)/2010 dated 16/07/2012 the following male ATs B-15 are hereby promoted to the post of senior ATs BPS-16 (RS 10000-800. 34000) Plus usual allowances as admissible under the rules on regular basis under the existing policy of the provincial Government on teaching cadre on the terms and conditions given below with immediate effect and further they will be posted in the Government Higher Secondary/High Schools by the District Education Officers concerned against the newly upgraded senior TT BPS-16 Posts.

Total No. of AT (M) Posts duly verified by the DAO	116
1/3 Share of Senior AT Posts	39
Share of Promotion 100%	39
Already promoted to the Senior AT BPS-16 and working	38
Posts available for promotion	01
Promoted to the post of senior AT B-16	01

S#	Seniority No	Name	Place of Posting	Date of Birth	Remarks
1	82	Hidayat Ullah	GMS Warijun	11-11-1973	Services placed at the disposal of DEO (M) Chitral for further posting

Terms and Conditions:

1. They would be on probation a period of one year extendable for another one year.
2. They would 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 his performance is found unsatisfactory during probationary period, in case of misconduct he shall be proceed under the rules framed from time to time.
4. Charge of 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
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 recorded and if he is wrongly promoted he will be reversed.

(Muhammad Rafiq Khattak)

Director

Elementary and secondary Education

Khyber Pakhtunkhwa Peshawar

Endst: No: 1552-58/File No. 1/ Promotion Senior AT B-16- Dated Peshawar the 18/04/2014.

Copy forwarded for information and necessary action to the.

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. District Education Officer (M) Chitral.
3. District Accounts Officer Chitral.
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.

(12)

Annexure 'D'

OFFICE OF THE DISTRICT EDUCATION OFFICER (MUL) OTHER CAPITAL
CHECK LIST FOR DEPARTMENTAL PROMOTION COMMITTEE MEETING DATED 25/05/2004 FOR THE PROMOTION OF SSI TO SST (G) EPS-16.

Sl. No.	Name	Father's Name	Place of posting	Service Book	Date of Birth	Date of last appointment	Remarks	Signature	Date
2	3	4	5	6	7	8	9	10	11
10	Hidayatullah	Sharafud Din	GHS Warjuna		11/11/1970	10/05/2004			

Amurose "D"
(Better copy)

OFFICE OF DISTRICT EDUCATION OFFICER (MALE) UPPER CHITRAL
CHECK LIST FOR DEPARTMENTAL PROMOTION COMMITTEE MEETING DATED 26-08-2020 FOR THE PROMOTION OF SAT BPS-16 TO SST(G) BPS-16

S #	Se n: #	Name	Father's Name	Plac e of Post ing	Serv ice Boo k	Da te of Bir th	Date of first appoint ment	Bi o Da ta	Syno psis	La st fiv e ye ar A CR	Las t 3 ye ar res ult	Noninvolv ement certificate	Servic e Certifi cate	La st p ay sli p	D/o Regular Appoint ment against AT post	Decisi on of the Comm ittee
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
	10	Hidayat Ullah	Sharaf Uddin	GHS Wari jun		11 - 11 - 19 73	10-05-2004								05-10-2004	

District Education Officer (M)
Upper Chitral

(14)

Annexure D

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) UPPER CHITRAL

Promotion to SST (G)

MEM No.1 PROMOTION OF SAT (BPS-16) MALE TO THE POST OF SST (G) (BPS-16) ON REGULAR BASIS

The case of Promotion of SAT BPS-16 to SST (G) BPS-16 was considered and the DPC decided as under

No of Vacant Post of SST (G)	11
5% Initial Recruitment Quota	2.75
5% Promotion Quota	8.25
0% CT SCT Promotion Quota to SST (G)	4.4
0% PST/SPSI/PSHT Promotion Quota to SST (G)	2.2
0% DM/SDM Promotion Quota to SST (G)	0.44
0% AT/SAT Promotion Quota to SST (G)	0.44
0% Share of AT/SAT reserved during DPS for the year 2019	0.2
0% Share of AT/SAT reserved during DPS for the year 2020	0.24
Total Share of AT/SATs for promotion to the post of SST (G)	0.88
Already Promoted SAT to SST (G)	0
Proposed for Promotion to SST (G)	1
	11

1	2	3	5	6	8	9	
S.#	Sen #	Name	Name of School	D/O Birth	Date of Appointment as regular AT	Academic & Professional Qualification	Remarks
1	10	Hidayatullah	GHS Warjun	11/11/1973	09/02/04	MA Arabic B Ed S Alamia	

CERTIFICATE

- All the SAT (Male) have been included in the panel for the promotion to SST (G) posts.
- All the SAT (Male) hold the posts on regular basis and none of them is holding the post on adhoc/acting charge basis/contract.
- All the SAT (Male) have completed the required minimum length of qualifying service and qualifications as required for promotion to the post of SSTs under the rules.
- None of them is on deputation to any organization under the Autonomous, Semi federal/provincial/autonomous/ International organization.
- Neither any disciplinary/departmental proceedings/And corruption Judicial enquiry is pending against them nor has any penalty been imposed upon any of them during the last five years.
- None of them is on long leave/Ex Pakistan leave.
- Their ACR's, Synopsis are free from adverse remarks.
- They are all alive and serving.
- His appointment order against AT post is attached here with.
- The seniority List of SATs/ATs is final, undisputed and not subject to dispute.
- The Departmental promotion committee is requested to determine the suitability of the above SAT for promotion to SSTs BPS-16 post with immediate effect.

- Director (E&SE) Peshawar
- Deputy Secretary (E&SE) Peshawar
- District Education Officer
- Deputy Director (E&SE) Peshawar

- Chairman
- Member
- Member
- Member

[Signature]
 District Education Officer
 (Male) Upper Chitral

No. 00121111

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(15)

America

(15)

(16)

Annexure 'F'



DISTRICT EDUCATION OFFICE (M) UPPER CHITRAL

Phone No. 0943-470252

Email address: deomchitralupper@gmail.com



No. 696 /EB (M) M-4/Misc

Dated 7/12/2022

To, The Director,
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar.

Subject: PROMOTION OF SAT AND STT TO SST (G)

Memo: Enclosed herewith kindly the DPC Meeting regarding promotion of SAT and STT to the post of SST (G) on the basis of Departmental promotion @ 4% ratio.

It is also added for your kind information that no any teacher has been promoted from the aforesaid cadres through the DPC conducted during 2019 & 2020. However, the name of Molvi Hidayat Ullah SAT GHS Warijun and Noor Shahidin STT GHS Reshun Upper Chitral was recommended by the committee for promotion to SST (G) post during recently conducted DPC meeting held on 01/09/2021. Their names have not been included in the notification.

The appeals are therefore, forwarded for your kind information and further necessary action.

Enclosure: DSC Meeting

District Education Officer
(M) Upper Chitral

Hand No. _____ /EB (M) M-4/Misc

Dated Booni the ___/___/2022

Copy forwarded to:

1. Mr. Molvi Hidayat Ullah SAT GHS Warijun for information.
2. Mr. Noor Shahidin STT GHS Reshun Upper for information.

District Education Officer
(M) Upper Chitral

1524
7-2-2022

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Annexure 'A'

To
The Director,
Elementary and Secondary Education,
Peshawar, Khyber Pakhtunkhwa,
Pakistan.

Subject: **PROVIDING INFORMATION ABOUT DEPARTMENTAL APPEAL**

Respected Sir,

WHEREAS, with respect it is stated that the undersigned is a Senior Arabic Teacher (SAT) and has preferred a departmental appeal for his promotion to the post of Secondary School Teacher-SST (BPS-16). In this respect the concern District Education Officer (DEO) Chitral Upper has forwarded the said appeal to your good office. The undersigned requests your good office about the current status of the said appeal.

It is therefore, requested that on acceptance of this appeal, information about the current status of the said appeal may kindly be provided.

Thanking you in anticipation.

Yours Sincerely,

Hidayat Ullah
Hidayat Ullah
SAT, Govt. High School,
Warijun Mulkhow,
Upper Chitral

Dated: 24th March, 2022

(18)

Promotion of SST of District Upper Chitral

Annexure 'A'



Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

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&SE/2012 dated 11.7.2012 and Finance Department Endorsement No.SO(FR)/FD/ 10-22(E)2010 dated 16.7.2012, the following CT/SCT and PSHT/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)	11
25% Initial Recruitment Quota	2.75
75% by Promotion Quota	8.25
40% CT/SCT Promotion quota to SST(G)	4.4
Proposed CT/SCT for Promotion to SST(G)	4

S.No	Sen#	Name of official/Desig:	Name of School	Date of Birth	Date of 1st Appointment as Regular CT	Academic & Professional Qualification	Remarks
1.	11	Zar Barat Khan	GHSS Shagram	20/4/1965	06/12/2014	MA/M Ed:	Services are placed at the disposal of DEO (M) Upper Chitral for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
2.	12	Mir Wazir Khan	GHS Booni	01/09/1964	06/12/2014	MA/B.Ed	Services are placed at the disposal of DEO (M) Upper Chitral for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
3.	14	Khowaja Khizer Khan	GHS Shongush	10/02/1971	06/12/2014	MA/M.Ed	Services are placed at the disposal of DEO (M) Upper Chitral for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
4.	15	Mirza Nadir Shah	GHS Rech	02/03/1968	22/07/2015	MA/M.Ed	Services are placed at the disposal of DEO (M) Upper Chitral for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

(19) Promotion of SST of District Upper Chitral

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

Total No. of Vacant Post of SST(G)	11
25% Initial Recruitment Quota	2.75
75% by Promotion Quota	8.25
20% PST/SPST/PSHT to SST(G)	2.2
Proposed PST/SPST/PSHT for Promotion to SST(G)	2

S.No	Sen#	Name of official/Desig:	Name of School	Date of Birth	Date of 1st Appointment as Regular PST	Academic & Professional Qualification	Remarks
1.	32	Akbar Azim Shah	GPS Parwak Bala	02/12/1969	26/12/2012	BA/ B.Ed:	Services are placed at the disposal of DEO (M) Upper Chitral for adjustment the post of SST (G) BPS-16 on regular basis with immediate effect.
2.	34	Miqdar Ali Khan	GPS Brep-02	12/01/1963	26/12/2012	BA/ B.Ed:	Services are placed at the disposal of DEO (M) Upper Chitral for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

B. SST (Bio/Chem)

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

Total No. of Vacant Post of SST(Bio/Chem)	5
25% Initial Recruitment Quota	1.25
75% by Promotion Quota	3.75
40% CT/SCT Promotion quota to SST(Bio/Chem)	2
Proposed CT/SCT for Promotion to SST(Bio/Chem)	2

S.No	Sen#	Name of official/Desig:	Name of School	Date of Birth	Date of 1st Appointment as Regular CT	Academic & Professional Qualification	Remarks
1.	124	Ijaz Ahmed	GMS Nichagh Owir	17/04/1991	09/03/2016	Msc/B.Ed	Services are placed at the disposal of DEO (M) Upper Chitral for adjustment against the post of SST (Bio/Chem) BPS-16 on regular basis with immediate effect.
2.	131	Ijlal Uddin	GMS Rayeen	02/03/1986	09/03/2016	Msc/B.Ed	Services are placed at the disposal of DEO (M) Upper Chitral 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)	5
25% Initial Recruitment Quota	1.25
75% by Promotion Quota	3.75
20% PST/SPST/PSHT to SST(Bio/Chem)	1
Proposed PST/SPST/PSHT for Promotion to SST(Bio/Chem)	1

- 1 They would be on probation for a period of one year extendible 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.

Terms and Conditions:-

S.No	Serial	Name of official/Design:	Name of School	Date of Birth	Date of 1st Appointment as Regular PST	Academic & Professional Qualification	Remarks
1	221	Sobrah Bhat	GPS Bhoori Gole	17/01/91	06/06/11	MSc/ B.Ed	Services are placed at the disposal of DEO (M) Upper Chitral for adjustment against the post of SST (Maths/Phy) BPS-16 on regular basis with immediate effect.

6	1.5	Total No. of Vacant Post of SST(Maths/Phy)
13	4.5	25% Initial Recruitment Quota
12	2.4	50% by Promotion Quota
1	2	40% CT SCT Promotion quota to SST(Maths/Phy)
		Proposed CT/SCT for Promotion to SST(Maths/Phy)

REGULAR BASIS

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

S.No	Serial	Name of official/Design:	Name of School	Date of Birth	Date of 1st Appointment as Regular CT	Academic & Professional Qualification	Remarks
1	125	Naveed Akhtar	GIS Koshum	22/06/1989	09/03/2016	MPhil/B.Ed.	Services are placed at the disposal of DEO (Mr Upper Chitral for adjustment against the post of SST (Maths/Phy) BPS-16 on regular basis with immediate effect.
2	126	Kamir Ahmad	GIS Nishku	20/01/1990	09/03/2016	MSc/M.Ed.	Services are placed at the disposal of DEO (Mr Upper Chitral for adjustment against the post of SST (Maths/Phy) BPS-16 on regular basis with immediate effect.

6	1.5	Total No. of Vacant Post of SST(Maths/Phy)
4.5	4.5	25% Initial Recruitment Quota
2.4	2.4	50% by Promotion Quota
2	2	40% CT SCT Promotion quota to SST(Maths/Phy)
		Proposed CT/SCT for Promotion to SST(Maths/Phy)

BASIS

C. SST (Maths/Phy)

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

S.No	Serial	Name of official/Design:	Name of School	Date of Birth	Date of 1st Appointment as Regular PST	Academic & Professional Qualification	Remarks
1	218	Fazle Maabood	GPS Raycen Bala	06/02/1988	06/06/2014	MSc/ B.Ed.	Services are placed at the disposal of DEO (M) Upper Chitral for adjustment against the post of SST (Bio/Chem) BPS-16 on regular basis with immediate effect.

Promotion of SST of District Upper Chitral

Promotion of SST of District Charsadda
 of Elementary and Secondary Schools
 Promotion of SST of District Charsadda

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Promotion of SST of District Upper Chitral

Their Inter-Se- seniority on lower post will remain intact.
No TA/DA is allowed for joining the duty.

They will give an under taking 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.

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 5013-18/ 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) Upper Chitral.
3. District Accounts Officer Upper Chitral.
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



C 21/A

Annex 1

Promotion of SST of District Dir Upper
Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

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&SE/2012 dated 11.7.2012 and Finance Department Endorsement No.SO(FR)/FD/ 10-22(E)2010 dated 16.7.2012, the following CT/SCT, DM/SDM, AT/SAT, TT/STT and PSHT/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)	22
25% Initial Recruitment Quota	5
75% by Promotion Quota	17
40% CT/SCT Promotion quota to SST(G)	9
Proposed for Promotion CT/SCT to SST(G)	9

S.No	S.L No	Name of Official	Present Place of Posting	Date of Birth	Date of Apptt: as regular CT	Qualification		Remarks
1	19	Mohammad Shouaib	GHS Nehag	07-04-67	01-11-99	MA	CT/ B.Ed	Services are placed at the disposal of DEO (M) Dir Upper for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
2	21	Hamidur Rahman	GHSS Akhagram	23-02-67	01-11-99	MA	CT/ B.Ed	Services are placed at the disposal of DEO (M) Dir Upper for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
3	22	Sirajul Islam	GHS Kattan (B)	20-01-70	01-11-99	BA	CT/ B.Ed	Services are placed at the disposal of DEO (M) Dir Upper for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
4	23	Attaullah	GHSS Wari	06-10-75	01-11-99	MA	CT/ M.Ed	Services are placed at the disposal of DEO (M) Dir Upper for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
5	24	Shahwar Khan	GHSS WARI	11-04-69	01-11-99	MA	CT, B.Ed,	Services are placed at the disposal of DEO (M) Dir Upper for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
6	25	Sahib Rawan	GHSS Nehag	22-04-72	01-11-99	MA	CT, B.Ed	Services are placed at the disposal of DEO (M) Dir Upper for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

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ITEM NO. 1. PROMOTION OF DISTRICT DIR LIPPER TO SST (G) HRS. 16 ON REGULAR BASIS

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ITEM NO. 2. PROMOTION OF DISTRICT DIR LIPPER TO SST (G) HRS. 16 ON REGULAR BASIS

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ITEM NO. 3. PROMOTION OF DISTRICT DIR LIPPER TO SST (G) HRS. 16 ON REGULAR BASIS

26	Relocation	CHSS Nohag	03-05-14	01-11-09	N/A	CT	Services are placed at the regular basis with immediate effect. Lipper for adjustment against disposal of D/O (M) Dir
27	Answer Return	CHS	03-01-09	01-11-09	NA	CT	Services are placed at the regular basis with immediate effect. Lipper for adjustment against disposal of D/O (M) Dir
28	Transfer	CHS Nohag	01-04-09	11-13-09	N/A	CT	Services are placed at the regular basis with immediate effect. Lipper for adjustment against disposal of D/O (M) Dir

Promotion of SST of District Dir Lipper

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7	26	Rehmanullah	GHSS Negah	03-05-74	01-11-99	MA	CT, BE d	Services are placed at the Disposal od DEO (M) Dir Upper for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
8	27	Aminur rehman	GHS Jughahanj	08-01-75	01-11-99	BA	CT. Bed	Services are placed at the Disposal od DEO (M) Dir Upper for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
9	28	Nazar Muhammad	GHS Rehankot	09-04-1973	31-12-1999	MA	CT, BEd, Med	Services are placed at the Disposal od DEO (M) Dir Upper for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

ITEM NO 2 PROMOTION OF DM/SDM TO SST (G) BPS-16 ON REGULAR BASIS.

Total no of vacant post of SST (G)	22
25% Initial Recruitment quota	5
75% by Promotion Quota	17
4% DM/SDM Promotion Quota to SST (G)	0.90
Proposed for Promotion	1

S.No	S.L No	Name of Official	Present place of posting	Date of Birth	Date of Apptt: as regular DM	Qualification	Remarks
1	1	Mushtaq Ahmad	GHSS Barawal	23-03-73	01-11-99	MA-DM-BEd	Services are placed at the Disposal od DEO (M) Dir Upper for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

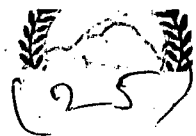
ITEM NO 3 PROMOTION OF AT/SAT TO SST (G) BPS-16 ON REGULAR BASIS.

Total no of vacant post of SST (G)	22
25% Initial Recruitment quota	5
75% by Promotion Quota	17
4% AT/SAT Promotion Quota to SST (G)	0.90
Proposed for Promotion	1

S.No	S.L No	Name of Official	Present place of posting	Date of Birth	Date of Apptt: as regular DM	Qualification	Remarks
1	13	Saheebur rehman	GHSS Rawakot	23-03-73	01-11-99	BA- Alamia- BEd	Services are placed at the Disposal od DEO (M) Dir Upper for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

ITEM NO 4 PROMOTION OF TT/STT TO SST (G) ON REGULAR BASIS.

Total no of vacant post of SST (G)	33
25% Initial Recruitment quota	5
75% by Promotion Quota	17
4% DM/SDM Promotion Quota to SST (G)	0.90
Proposed for Promotion	1



Directorate - Qari

Promotion

Promotion of SST of District Dir Upper

8	Rashid Ahmad	GHIS Kattan bala	20-02-68	11-03-05	MA	Alamia, B.Ed	Services are placed at the disposal of DEO (M) Dir Upper for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
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ITEM NO.5 PROMOTION OF Qari/S.QARI TO SST (G) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(G)	22
25% Initial Recruitment Quota	5
75% by Promotion Quota	17
3% Qari/S.Qari Promotion quota to SST(G)	0.68
Proposed for Promotion Qari/S.Qari to SST(G)	1

S.No	S.L No	Name of Official	Name of School	Date of Birth	Date of Apptt: as regular Qari	Qualification	Remarks
1	10	Fazir Ullah	GHSS Nchag	16-02-90	27-04-12	MA Hifz Ul Quran, B.Ed	Services are placed at the disposal of DEO (M) Dir Upper for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

ITEM NO.6 PROMOTION OF PST/SPST/ PSHT TO SST (G) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(G)	22
25% Initial Recruitment Quota	5
75% by Promotion Quota	17
20% PST/SPST/ PSHT Promotion quota to SST(G)	4
Proposed for Promotion PST/SPST/ PSHT to SST(G)	4

S.No	S.L No	Name of Official	Name of School	Date of Birth	Date of Apptt: as regular PST	Qualification	Remarks
1.	123	Niaz Muhammad	GPS, Kandow Jabbar	12-05-1973	01-03-1993	BA PTC, B.Ed	Services are placed at the disposal of DEO (M) Dir Upper for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
2.	124	Muhammad Tahir Khan	GPS, Gamscer Jabbar	03-10-1973	01-03-1993	BA PTC, BED	Services are placed at the disposal of DEO (M) Dir Upper for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
3.	125	Attaullah Khan	GPS, Kakad Paycen	12-03-1974	01-03-1993	BA PTC, BED	Services are placed at the disposal of DEO (M) Dir Upper for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
4.	126	Hamidullah	GPS, Kattan Bala	15-06-1972	15-03-1993	BA PTC, BED	Services are placed at the disposal of DEO (M) Dir Upper 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 Dir Upper

SST(Bio/Chem)

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

The case of promotion of PST/PSHT/SPST to the post of SST (Bio/Chem) BPS-16 was considered and the DPC recommended as under:-

Total No. of Vacant Post of SST(Bio/Chem)	5
25% Initial Recruitment Quota	1.25
75% by Promotion Quota	3.75
20% PST/SPST/PSHT Promotion quota to SST(Bio/Chem)	1
Proposed for Promotion PST/SPST/PSHT to SST(Bio/Chem)	1

S.No	S.L No	Name of Official	Name of School	Date of Birth	Date of Apptt: as regular PST	Qualification		Remarks
01.	640	Rahmat Bacha	GPS Balkore Wari	02/02/1986	28/12/2006	BSC	PTC/B.Ed	Services are placed at the disposal of DEO (M) Dir Upper for adjustment against the post of SST (Bio/Chem) BPS-16 on regular basis with immediate effect.

C. SST(Maths Physics)

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

BASIS

Total No. of Vacant Post of SST(Maths/Phy)	6
25% Initial Recruitment Quota	1
75% by Promotion Quota	5
20% PST/SPST/ PSHT Promotion quota to SST(Maths/Phy)	1
Proposed for Promotion PST/SPST/ PSHT to SST(Maths/Phy)	1

S.No	S.L No	Name of Official	Name of School	Date of Birth	Date of Apptt: as regular PST	Qualification		Remarks
01.	931	Zia Ur Rahman	GPS, Nasir Abad	01-03-1989	03-05-2014	MSC	PTC,BED	Services are placed at the disposal of DEO (M) Dir Upper 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 under taking 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.

1. The Government of India is pleased to inform you that the Government has decided to grant you the honor of the rank of Major in the Indian Army.

2. The rank of Major is a very honorable rank and is a mark of distinction. It is a rank which is held by a few officers only. It is a rank which is held by officers who have shown exceptional gallantry and leadership in the field.

3. The rank of Major is a rank which is held by officers who have shown exceptional gallantry and leadership in the field. It is a rank which is held by officers who have shown exceptional gallantry and leadership in the field.

4. The rank of Major is a rank which is held by officers who have shown exceptional gallantry and leadership in the field. It is a rank which is held by officers who have shown exceptional gallantry and leadership in the field.

5. The rank of Major is a rank which is held by officers who have shown exceptional gallantry and leadership in the field. It is a rank which is held by officers who have shown exceptional gallantry and leadership in the field.

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Those who have been promoted on the basis of additional subjects, their promotion is subject to the condition of the outcome of HEC.

Hafiz Dr. Muhammad Ibrahim

Director

Elementary and secondary
Education Khyber Pakhtunkhwa

Endst: No 3223.38/File no 3/ promotion of SST (BPS-16) Dated Peshawar 10/10/2021

Copy forwarded for information and necessary action to the

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. District Education Officer (M) Dir Upper
3. District Account Officer Dir Upper
4. Officials Concerned
5. PS to the secretary to Government of Khyber Pakhtunkhwa E&SE Department
6. PS to the Director E&SE Khyber Pakhtunkhwa Peshawar
7. M/file

Deputy Director (Katab)

Elementary and secondary Education
Khyber Pakhtunkhwa Peshawar

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**THE ¹KHYBER PAKHTUNKHWA CIVIL SERVANTS
(APPOINTMENT, PROMOTION & TRANSFER) RULES, 1989**

PART-I

GENERAL

1. **Short title and commencement:** - (1) These rules may be called the ²[Khyber Pakhtunkhwa] Civil Servants (Appointment, Promotion and Transfer) Rules, 1989.

(2) They shall come into force at once.

2. **Definitions:**-(1) In these rules, unless the context otherwise requires:-

(a) "Appointing Authority" in relation to a post, means the persons authorized under rule 4 to make appointment to that post;

(b) "Basic Pay Scale" means the Basic Pay Scale for the time being sanctioned by Government, in which a post or a group of posts is placed;

(c) "Commission" means the ³[Khyber Pakhtunkhwa] Public Service Commission;

⁴(d) "Departmental Promotion Committee" means a committee constituted for making selection for promotion or transfer to such posts under a Department, or offices of Government, which do not fall within the purview of the Provincial Selection Board;

⁵(dd) "Departmental Selection Board" means a Board constituted for the purpose of making selection for initial recruitment /appointment to posts under a Department or office of Government in Basic Pay Scale 17 not falling within the purview of the Commission:

Provided that more than one such committees may be constituted for civil servants holding different scales of pay".

(e) "Departmental Selection Committee" means a committee constituted for the purpose of making selection for initial appointment to posts under a department, or office of Government [in Basic Pay Scale 17 and below not falling within the purview of the Commission];

(f) "Post" means a post sanctioned in connection with the affairs of the Province, but not allocated to all Pakistan Unified Grades ; and

¹ For the words "NWFP" or "North-West Frontier Province", wherever occurred, the words "Khyber Pakhtunkhwa" substituted by the Khyber Pakhtunkhwa Laws (Amendment) Act, 2011 (Khyber Pakhtunkhwa Act No. IV of 2011) published in the Khyber Pakhtunkhwa Government Gazette Extraordinary dated 2nd April, 2011

² Sub. by the Khyber Pakhtunkhwa Act No. IV of 2011.

³ Sub. by the Khyber Pakhtunkhwa Act No. IV of 2011.

⁴ Substituted by Clause (d) of sub-rule (1) of Rule 2 vide Notification No. SOR-I (S&GAD) 4-1/80 (Vol-II) dated 14-01-92.

⁵ Clause (dd) added by Notification No. SOR-III (S&GAD) 2-7/86, dated 8-12-1994

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⁶(g) "Provincial Selection Board" means the Board constituted by Government for the purpose of selection of civil servants for promotion or transfer to posts in respect whereof the appointing authority under rule 4 is the Chief Minister and shall consist of such persons as may be appointed to it by Government from time to time.

(2) Words and expressions used but not defined in these rules shall have the same meanings as are assigned to them in the ⁷[Khyber Pakhtunkhwa] Civil Servants Act, 1973 (⁸[Khyber Pakhtunkhwa] Act XVIII of 1973) or any other statutory order or rules of Government for the time being in force.

3. **Method of Appointment:-** (1) Appointment to posts shall be made by any of the following methods, namely:-

- (a) by promotion or transfer in accordance with the provisions contained in Part-II of these rules; and
- (b) by initial recruitment in accordance with the provisions contained in Part-III of these rules.

(2) The method of appointment, qualifications and other conditions applicable to a post shall be such as laid down by the Department concerned in consultation with the ⁹Establishment and Administration Department and the Finance Department.

4. **Appointing Authority:-** The authorities competent to make appointment to posts in various basic pay scales shall be as follows:-

S.No. !	Posts !	Appointing Authority
¹⁰ 1. (a)	Posts in Basic Pay Scale 18 and above including posts in Basic Pay Scale 17 borne on any of the following services; (i) Former Provincial Civil Service (Executive Branch); (ii) Former Provincial Civil Service (Judicial Branch); and (iii) Provincial Civil Secretariat Service.	Chief Minister
¹¹ (b)	Posts in Basic Pay Scale 17	Chief Secretary

⁶ Clause (g) substituted by Notification No. SOR-I(S&GAD) 4-1/80/II, dated 14-01-1992.

⁷ Sub. by the Khyber Pakhtunkhwa Act No. IV of 2011.

⁸ Sub. by the Khyber Pakhtunkhwa Act No. IV of 2011.

⁹ For the words "Services and General Administration" wherever occurred, substituted with the words "Establishment and Administration" by Notification No. SO(O&M) E&AD/8-6/2001 dated 30-05-2001.

¹⁰ Substituted by Notification No. SOR-I(S&GAD)4-1/75/Vol-I, dated 22-08-1991.

¹¹ Substituted by Notification No. SOR-III(E&AD)2(144)03 dated 16-09-2003.

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other than those covered by
(a) above and the post of
Deputy Superintendent of
Police; and.

¹²(c) Posts of Deputy Superintendents
of Police.

Provincial Police Officer/
Inspector General of Police.

2. Posts in Basic Pay Scale 16.

(a) In the case of Secretariat of the
Government of ¹³[Khyber Pakhtunkhwa],
the Chief Secretary.

¹² Inserted by Notification No. SOR-III(E&AD)2(144)03 dated 16-09-2003.

¹³ Sub. by the Khyber Pakhtunkhwa Act No. IV of 2011.

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- (b) In case of High Court, the Chief Justice; and
- (c) In the case of Attached Department:
- (i) the Head of Attached Department concerned; and
 - (ii) In any other case the Secretary of the Department concerned.
3. Posts in Basic Pay Scales 3 to 15.
- (a) In the case of civil Servants borne on ministerial establishment of Civil Courts subordinate to High Court, the officer authorized as such by the Chief Justice; and
 - (b) In other cases
 - (i) an officer declared under the relevant Delegation of Powers Rules, which shall to this extent be deemed as operative; or
 - (ii) Where no such appointing authority has been declared, the Secretary to Government or the Head of an Attached Department/ Office, as the case may be.

4. posts in Basic pay Scale 1 and 2.

Deputy Secretary incharge of Administration or office, , as the care may be

5. ¹⁴Departmental Promotion & Selection Committee/Board- (1) In each Department or office of Government there shall be one or more Departmental Promotion Committee and Departmental Selection Committee ¹⁵(or, as the case may be, Departmental Selection Board), the composition of which shall be determined by the Establishment and Administration Department or the Department in consultation with the Establishment and Administration Department.

(2) Each such Committee (or the Board, as the case may be), shall consist of at least three members, one of whom shall be appointed as Chairman.

¹⁴ The heading of rule 5 substituted by Notification No. SOR-I(S&GAD)2-7/86, dated 8-12-1994.

¹⁵ The words inserted by Notification No. SOR-III(S&GAD)2-7/86, dated 8-12-1994

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¹⁶6. **Procedure when recommendation is not accepted:-** When an appointing authority for Basic Pay Scale 17 or below does not accept the recommendation of a Departmental Promotion or Selection Committee, or the Departmental Selection Board, as the case may be, it shall record its reasons and obtain order of the next higher authority.

PART-II

APPOINTMENT BY PROMOTION OR TRANSFER

7. **Appointment by Promotion or Transfer.** ¹⁷(1) Except as otherwise provided in any service rules for the time being in force, appointment by promotion or transfer to posts in respect whereof the appointing authority under rule 4 is the Chief Minister shall ordinarily be made on the recommendation of the Provincial Selection Board and promotion and transfer to posts other than those falling within the purview of the Provincial Selection Board shall ordinarily be made on the recommendation of appropriate Departmental Promotion Committee".

(2) Appointment by transfer shall be made from amongst the persons holding appointment on regular basis in the same basic pay scale, in which the posts to be filled, exist.

(3) Persons possessing such qualifications and fulfilling such conditions as laid down for the purpose of promotion or transfer to a post shall be considered by the Departmental Promotion Committee or the Provincial Selection Board for promotion or transfer, as the case may be.

(4) No promotion on regular basis shall be made to posts in Basic Pay Scale 18 to 21 unless the officer concerned has completed such minimum length of service as may be specified from time to time.

¹⁸(5) If on an order of promotion or before promotion any civil servant declines in writing, to accept promotion, such civil servant shall not be considered for such promotion for the next four years following order.

Provided that if he declines to avail the benefit of promotion for the second time, then he shall stand superseded permanently for such promotion.

8. **Inter-Provincial Transfer:-**(1) Persons holding appointment in BPS 1 to 15 under Federal Government and other Provincial Government may, in deserving cases, be transferred to equivalent posts under these rules:-

Provided that:-

- (i) the Federal Government or the Government of the Province concerned, as the case may be, has no objection to such a transfer;
- (ii) the person seeking transfer possesses the requisite qualification and experience and the post to which his transfer is intended can, under the rules, be filled by transfer;
- (iii) the person concerned holds appointment to the post in his parent Department on regular basis;

¹⁶ Rule-6 substituted by Notification No. SOR-III(S&GAD)2-7/86, dated 8-12-1994

¹⁷ Sub rule (1) substituted by Notification No. SOR-I(S&GAD)4-1/80/II, dated 14-01-1992.

¹⁸ Sub rule (5) inserted by Notification No. SOR-VI(E&AD)1-3/2009/Vol-VIII, dated 22-10-2011.

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- (iv) the person concerned is a bona fide resident of the ¹⁹[Khyber Pakhtunkhwa].
(v) a vacancy exists to accommodate the request for such a transfer; and:
(vi) Provided further that in most deserving cases, the merit of which shall be determined on case to case basis and the decision of the Competent Authority in that behalf shall be final, Government may allow transfer of a civil servant in BPS-16 and above, subject to the aforesaid conditions.

(2) A person so transferred shall be placed at the bottom of the cadre strength which he joins for the purpose of determining his seniority vis-à-vis other members borne on the cadre.

(3) It will be the sole discretion of the appointing authority to accept or refuse a request for transfer under this rule and any decision made in this behalf shall be final and shall not be quoted as precedence in any other case.

9. **Appointment on Acting Charge or current Charge Basis.** (1) Where the appointing authority considered it to be in the public interest to fill a post reserved under the rules for departmental promotion and the most senior civil servant belonging to the cadre or service concerned, who is otherwise eligible for promotion, does not possess the specified length of service the authority may appoint him to that post on acting charge basis;

²⁰Provided that no such appointment shall be made, if the prescribed length of service is short by more than ²¹[three years].

²²[(2)].

(3) In the case of a post in Basic Pay Scale 17 and above, reserved under the rules to be filled in by initial recruitment, where the appointing authority is satisfied that no suitable officer drawing pay in the basic scale in which the post exists is available in that category to fill the post and it is expedient to fill the post, it may appoint to that post on acting charge basis the most senior officer otherwise eligible for promotion in the organization, cadre or service, as the case may be, in excess of the promotion quota.

(4) Acting charge appointment shall be made against posts which are likely to fall vacant for period of six months or more. Against vacancies occurring for less than six months, current charge appointment may be made according to the orders issued from time to time.

(5) Appointment on acting charge basis shall be made on the recommendations of the Departmental Promotion Committee or the Provincial Selection Board, as the case may be.

(6) Acting charge appointment shall not confer any vested right for regular promotion to the post held on acting charge basis.

PART-III

INITIAL APPOINTMENT

¹⁹ Sub. by the Khyber Pakhtunkhwa Act No. IV of 2011.

²⁰ Full stop at the end of Rule 9 (1) replaced with colon and proviso added by Notification No. SOR-I (S&GAD)4-1/80/Vol-II, dated 20-10-1993.

²¹ The words one year substituted by Notification No. SOR-I(S&GAD)4-1/80/III, dated 14.3.96.

²²Sub rule (2) of rule-9 deleted vide by Notification No. SOR-VI(E&AD)1-3/2009/Vol-VIII, dated 22-10-2011.

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10. **Appointment by Initial Recruitment** :- (1) Initial appointment to posts ²³[in various basic pay scales] shall be made-

- (a) if the post falls within the purview of the Commission, on the basis of Examination or test to be conducted by the Commission; or
- (b) if the post does not fall within the purview of the Commission, in the manner as may be determined by Government.

²⁴(2) Initial recruitment to posts which do not fall within the purview of the Commission shall be made on the recommendation of the Departmental Selection Committee, after vacancies have been advertised in newspapers.

²⁵Provided that nothing contained in this sub-rule shall apply to the household staff of the Chief Minister House Peshawar, ²⁶[Khyber Pakhtunkhwa] House Islamabad, ²⁷[Khyber Pakhtunkhwa] Rest Houses Bannu, Swat and Abbottabad, ²⁸[Khyber Pakhtunkhwa] House Nathia Galli and Shahi Mehman Khana, Peshawar and any other House to be established by the Government:

²⁹Provided further that the appointment in Basic Pay Scale-1 to 4 shall be made on the recommendations of the Departmental Selection Committee through the District Employment Exchange concerned, ³⁰[or, where in a District, the office of the Employment Exchange does not exist, after advertising the posts in the leading newspapers] ³¹[]

(3) A candidate for initial appointment to a post must possess the educational qualification or technical qualifications and experience and except as provided in the rules framed for the purpose of relaxation of age limit, must be within the age limit as laid down for the post, provided that-

- (i) ³²where recruitment is to be made on the basis of written examination, then, notwithstanding anything to the contrary contained in any other rules for the time being in force, age shall be reckoned on 1st January of the year in which the examination is proposed to be held;
- (ii) in other cases as on the last date fixed for submission of applications for appointment.

²³ The words in basic pay scale-16 to 21 substituted by Notification No. SOR-I(S&GAD)1-117/91 (C), dated 12-10-1993.

²⁴ Sub rule (2) of Rule-10 substituted by Notification No. SOR-I(S&GAD) 1-117/91 (C), dated 12-10-1993.

²⁵ Proviso added vide Notification No. SOR-VI(E&AD)1-3/2003 (VI) dated 03-07-2003.

²⁶ Sub.by the Khyber Pakhtunkhwa Act No. IV of 2011.

²⁷ Sub.by the Khyber Pakhtunkhwa Act No. IV of 2011.

²⁸ Sub.by the Khyber Pakhtunkhwa Act No. IV of 2011.

²⁹ Proviso added vide Notification No. SOR-VI(E&AD)1-3/2003 (VI) dated 16-03-2004

³⁰ Sentence added in the Proviso vide Notification No. SOR-VI(E&AD)1-3/2003 (VI) dated 23-01-2006.

³¹ 2nd Proviso in sub- rule (2) of Rule. 10 was deleted vide Notification No. SOR-VI(E&AD)1-3/2008 dated 09-05-2008 and added again vide Notification No. SOR-VI(E&AD)1-3/2008 dated 03-11-2008.

³² Clause (i) substituted vide Notification No. SOR-I(S&GAD)4-1/80, dated 17-5-1989.

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³³(4) Where a civil servant dies or is rendered incapacitated/invalidated permanently during service then notwithstanding the procedure provided for in sub-rule (2), the appointing authority may appoint one of the children of such civil servant, or if the child has not attained the age prescribed for appointment in Government Service, the widow/wife of such civil servant, to a post in any of the Basic Pay Scales 1-10:

Provided that the child or the widow/wife as the case may be, possesses the minimum qualification prescribed for appointment to the post:

Provided further that if there are two widows/wives of the deceased civil servant, preference shall be given to the elder widow/wife.

Provided also that the appointment under this sub rule is subject to availability of a vacancy and if more than one vacancies in different pay scales are available at a time, and the child or the widow/wife, as the case may be, possesses the qualifications making him or her eligible for appointment in more than one post, he /she shall ordinarily be appointed to the post carrying higher pay scale.

Provided further that this shall not apply to any post in BPS-1-10 falling in the purview of the.³⁴[Khyber Pakhtunkhwa] Public Service Commission.

³⁵(5) Notwithstanding anything contained in any rule for the time being in force, two percent of all posts in each basic pay scale to be filled in by initial recruitment shall be reserved for disabled candidates and ten percent of all posts meant for initial recruitment shall be reserved for female candidates:

Explanation-I---For the purpose of reservation under this sub-rule "disability" does not include such disability which hampers in the smooth performance of the duties required of a disabled candidate.

Explanation-II---Ten per cent quota reserved above shall be in addition to the posts exclusively reserved for female candidates.

³⁶(6) Notwithstanding anything contained in any rule for the time being in force, five per cent of all posts in each basic pay scale to be filled in by initial recruitment shall be reserved for candidates hailing from earthquake affected areas of District Mansehra, Battgram, Shangla, Kohistan and Abbottabad (Calamity hit area) for a period of three years commencing from 1st February, 2006.

³⁷(7) Notwithstanding anything contained in any rule for the time being in force, ³⁸[three] percent of all the posts in each basic pay scale to be filled in by initial recruitment shall be reserved for candidates belonging to minorities in addition to their participation in the open merit:

Provided that, the reservation shall not apply to—

³³ Sub rule (4) substituted vide Notification No. SOR-VI (E&AD)1-3/2011/Vol-VIII, dated 31-08-2012.

³⁴ Sub.by the Khyber Pakhtunkhwa Act No. IV of 2011.

³⁵ Sub rule (5) substituted vide Notification No. SOR-VI (E&AD)1-10/03 (VI), dated 04-12-2007.

³⁶ Sub rule (6) inserted vide Notification No. SOR-VI(E&AD)1-3/03 (VI), dated 01-02-2006

³⁷ Sub rule (7) added vide Notification No. SOR-VI(E&AD)1-3/08, dated 06-01-2009

³⁸ Subs. vide Notification No. SORIV/E&AD/1-10(Minority)/2008, dated 08.01.2014.

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- (i) the percentage of vacancies reserved for recruitment on merit;
- (ii) short term vacancies likely to last for less than one year; and
- (iii) isolated posts in which vacancies occur only occasionally.

11. **Eligibility.** (1) A candidate for appointment shall be a citizen of Pakistan and bona fide resident of the ³⁹[Khyber Pakhtunkhwa].

Provided that for reasons to be recorded in writing, Government may, in a particular case, relax this restriction.

⁴⁰[(2)]

(3) No person, not already in Government service, shall be appointed to a post unless he produces a certificate of character from the principal, academic officer of the academic institution last attended and also certificates of character from two responsible persons, not being his relatives, who are well acquainted with his character and antecedents.

(4) Notwithstanding anything contained in sub-rule (3), an appointment by initial recruitment shall be subject to the verification of character and antecedents of the candidate or the person appointed, to the satisfaction of appointing authority.

(5) No candidate shall be appointed to a post unless he is found, after such medical examination as Government may prescribe, to be in good mental and bodily health and free from physical defect likely to interfere in the efficient discharge of his duties.

12. **Zonal and Divisional representation:** - (1) Except as otherwise specifically provided in any rule for the time being in force, initial recruitment to posts in Basic Pay Scales 16 and 17 and other posts in Basic Pay Scales 3 to 15 borne on Provincial cadre shall be made in accordance with the Zonal quota specified by Government from time to time:

⁴¹Provided that initial recruitment to the post of Civil Judge/Judicial Magistrate/Allaqa Qazi (BPS-18) shall also be made in accordance with the zonal quota specified by the Government from time to time.

(2) Initial recruitment to posts in Basic Pay Scales 3 to 15 borne on divisional or district cadre shall be made from amongst bona fide residents of the division or district concerned, as the case may be.

(3) Initial recruitment to posts in Basic Pay Scales 1 and 2 or equivalent shall ordinarily be made on local basis.

PART-IV

AD HOC APPOINTMENT

13. **Requisition to Commission:-**When under any rule for the time being in force, a post is

³⁹ Sub. by the Khyber Pakhtunkhwa Act No. IV of 2011.

⁴⁰ Sub rule (2) of rule-11 deleted vide Notification No. SOR-VI(E&AD)1-3/08, dated 17-06-2008

⁴¹ Proviso to rule-12 added vide Notification No. SOR-VI(E&AD)1-27/08, dated 03-07-2008

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required to be filled in through the Commission, the appointing authority shall forward a requisition on the prescribed form to the Commission immediately after it is decided to fill in the post, or if that is not practicable and the post is filled on ad hoc basis as provided in rule 14, within two months of the filling of the post.

14. **Ad hoc Appointment:-**(1) When the appointing authority considers it to be in the public interest to fill in a post falling within the purview of the Commission urgently, it may, pending nomination of a candidate by the Commission, proceed to fill in such post on ad hoc basis for a period not exceeding ⁴²[one year] by advertising the same in accordance with the procedure laid down for initial appointment in Part-III of these rules.

(2) Short term vacancies in the posts falling within the purview of the Commission and vacancies occurring as a result of creation of temporary posts for a period not exceeding ⁴³[one year], may be filled in by appointing authority otherwise than through the Commission on a purely temporary basis after advertising the vacancy.

PART-V

PROBATION AND CONFIRMATION

⁴⁴15. **Probation.** ----- (1) Persons appointed to posts by initial recruitment, promotion or transfer shall be on probation for a period of one year.

(2) The appointing authority, if considers necessary, may extend the probation period for one year as may be specified at the time of appointment.

⁴⁵(3) On the successful completion of probation period, the appointing authority shall, by specific order terminate the probation of the officer or official concerned within two months after the expiry of probation period prescribed in sub-rule(1):

Provided that if no specific order regarding termination of the probation period of the official or officer concerned is issued within two months, the period of probation shall be deemed to have been extended under sub-rule (2):

Provided further that if no specific order is issued on the expiry of the extended period of probation, the period of probation shall be deemed to have been successfully completed."

16. **Confirmation:-**After satisfactory completion of the probationary period, a civil servant shall be confirmed; provided that he holds a substantive post, provided further that a civil servant shall not be deemed to have satisfactorily completed his period of probation, if he has failed to pass an examination, test or course or has failed to complete successfully a training prescribed within the meaning of sub-section (3) of Section 6 of the ⁴⁶[Khyber Pakhtunkhwa] Civil Servants Act, 1973.

⁴² The words six months replaced with the words one year vide Notification No. SOR-VI(E&AD)1-3/08, dated 17-01-2009.

⁴³ The words six months replaced with the words one year vide Notification No. SOR-VI(E&AD)1-3/08, dated 17-01-2009.

⁴⁴ Rule-15 substituted vide Notification No. SOR-VI/E&AD/1-3/2009/Vol-VIII dated 16-2-2010.

⁴⁵ Sub rule (3) substituted vide Notification No. SOR-VI (E&AD)1-3/2012 dated 28-12-2012.

⁴⁶ Sub.by the Khyber Pakhtunkhwa Act No. IV of 2011.

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PART-VI

SENIORITY

17. **Seniority :-** (1) the seniority inter se of civil servants ⁴⁷(appointed to a service, cadre or post) shall be determined:-

- (a) in the case of persons appointed by initial recruitment, in accordance with the order of merit assigned by the Commission ⁴⁸[or as the case may be, the Departmental Selection Committee;] provided that persons selected for appointment to post in an earlier selection shall rank senior to the persons selected in a later selection; and
- (b) in the case of civil servants appointed otherwise, with reference to the date of their continuous regular appointment in the post; provided that civil servants selected for promotion to a higher post in one batch shall, on their promotion to the higher post, retain their inter se seniority as in the lower post.

Explanation-I:- If a junior person in a lower post is promoted to a higher post temporarily in the public interest, even though continuing later permanently in the higher post, it would not adversely effect the interest of his seniors in fixation of his seniority in the higher post.

Explanation-II:- If a junior person in a lower post is promoted to a higher post by superseding a senior person and subsequently that senior person is also promoted the person promoted first shall rank senior to the person promoted subsequently; provided that junior person shall not be deemed to have superseded a senior person if the case of the senior person is deferred for the time being for want of certain information or for incomplete record or for any other reason not attributing to his fault or demerit.

Explanation-III:- A junior person shall be deemed to have superseded a senior person only if both the junior and the senior persons were considered for the higher post and the junior person was appointed in preference to the senior person.

(2) Seniority in various cadres of civil servants appointed by initial recruitment vis-à-vis those appointed otherwise shall be determined with reference to the dates of their regular appointment to a post in that cadre; provided that if two dates are the same, the person appointed otherwise shall rank senior to the person appointed by initial recruitment.

⁴⁹(3) In the event of merger/restructuring of the Departments, Attached Departments or Subordinate Offices, the inter se seniority of civil servants affected by the merger/restructuring as aforesaid shall be determined in accordance with the date of their regular appointment to a cadre or post.

⁵⁰(4) The inter-se-seniority of civil servants in a certain cadre to which promotion is made from different lower posts, carrying the same pay scale shall be determined from the date of regular appointment/promotion of the civil servants in the lower post.

Provided that if the date of regular appointment of two or more civil servants in the

⁴⁷ Substituted for the words appointment to a post in the same basic pay scale in a cadre by Notification No. SOR-I(S&GAD)4-1/80, dated 17-05-1989.

⁴⁸ The words inserted by Notification No. SOR-I(S&GAD)4-1/80/II, dated 04-02-1996.

⁴⁹ Sub-rule (3) of Rule 17 added vide Notification No. SOR-I(E&AD)4-1/80/IV, dated 28-5-2002.

⁵⁰ Sub-rule (4) of Rule 17 added vide Notification No. SOR-VI (E&AD) 1-3/2008 dated 19-11- 2009.

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lower post is the same, the civil servant older in age, shall be treated senior.

18. General Rules: - In all matters not expressly provided for in these rules, civil servants shall be governed by such rules as have been or may hereafter be prescribed by Government and made applicable to them.

19. Repeal:- The ⁵¹[Khyber Pakhtunkhwa] Civil Servants (Appointment, Promotion and Transfer) Rules, 1975, are hereby repealed.

(Authority; No. SORI(S&GAD)4-1/80, dated 13th May, 1989)

⁵¹ Sub. by the Khyber Pakhtunkhwa Act No. IV of 2011.

BEFORE THE KYBER PAKHTUNKHAW SERVICE TRIBUNAL,
PESHAWAR

Hidayatullah

VS Govt of KPK and Others

NOTICE TO RESPONDANTS

TO,

- 1) Government of Khyber Pakhtunkhwa,
Through Chief Secretary, Civil Secretariat,
Peshawar.
- 2) Secretary Education Khyber Pakhtunkhwa,
Civil Secretariat, Peshawar.
- 3) Director of Education (Male) Khyber
Pakhtunkhwa, Peshawar.
- 4) Director, Elementary & Secondary
Education Department (Establishment),
Khyber Pakhtunkhwa, Peshawar.
- 5) District Education Officer (Male) District
Chitral Upper Booni.

Please take notice I am going to prefer an appeal against you before the Hon'ble service tribunal Peshawar.

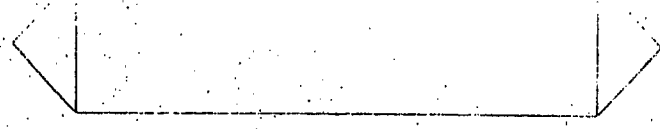
APPELLANT

THROUGH

HidayaturRehman

Advocate High Court

بجھالت جناب سروس ٹریبونل، سیٹار



2022 پنجاب عدالتی

12 - اپریل

مورخہ

مقدمہ

دعویٰ

جرم

مدیر ایٹم بینام گورنمنٹ ایٹم اینڈ سائبرجیکس ایٹم ایڈمنسٹریشن

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ

آن مقام سیٹار کیلئے ایٹم افرین ڈیٹا ان امر

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز

وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور

بصورت ڈگری کرنے اجراء اور وصولی چیک روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق

ذرائع پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی

اور مشورتی نیز دائر کرنے اپیل نگرانی و نظر ثانی پیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت

مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے

تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے

اور اس کا ساختہ پر داختم منظور قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے

سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب یا بند ہوں

گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

المرقوم 19 ماہ 04 2022

العہد گداہ العہد

کے لئے منظور ہے۔

Accepted and accepted

Handwritten signature

Handwritten signature