

ORDER


14.01.2022

Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General for respondent present. Arguments heard and record perused.

Vide our detailed judgment of today, Passed in service appeal bearing No. 1427/2011 "titled Manzoor Elahi Versus Government of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa Peshawar and three others", the instant service appeal is accepted as prayed for. Parties are left to bear their own costs. File be consigned to record room.

ANNOUNCED

14.01.2022



(AHMAD SULTAN TAREEN)
CHAIRMAN



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

22.11.2021

Nemo for appellant.

Muhammad Riaz Khan Paindakheil learned Assistant Advocate General present.

Asif Yousafzai Advocate present before the Bench in some other case, apprised this Bench in respect of the judgment of Larger Bench of this Tribunal vide which the appeal in hand was detached from other appeals and was directed to be fixed for individual hearing on merits. Office was directed to fix the date in proper routine but parties were not put on notice for the date fixed, therefore, both the parties be put on notice for 15.03.2022 before D.B.



(Atiq ur Rehman Wazir)
Member (E)



(Rozina Rehman)
Member (J)

10.01.2022

Mr. Noor Muhammad Khattak, Advocate for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General for respondents present.

Arguments heard. To come up for order on 14.01.2022 before D.B.



(Atiq-ur-Rehman Wazir)
Member(E)



Chairman

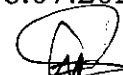
02.02.2021

Due to COVID-19, the case is adjourned for the same on 07.04.2021 before D.B.


READER

07.04.2021

Due to demise of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 08.07.2021 for the same as before.


Reader

08.07.2021

Junior to counsel for appellant present.

Muhammad Adeel Butt learned Additional Advocate General for respondents present.

Former made a request for adjournment as senior counsel is away from station. Request is accorded. To come up for arguments on 22.11.2021 before D.B.



(Rozina Rehman)
Member(J)

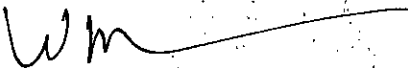

Chairman

28.09.2020

Counsel for appellant present.

Mr. Usman Ghani, learned District Attorney for respondents is also present.

According to the learned counsel the issue for consideration in the instant appeal is with regard to the fact of Selection Grade and against the same issue a Larger Bench has been constituted and the appeal is pending adjudication on 10.11.2020, therefore, he requested that the case may be adjourned to a date till the decision is made on the point. Request is proper and the case is adjourned to 19.11.2020 on which to come up for further proceedings/arguments on 19.11.2020 before D.B.


(Atiq-ur-Rehman Wazir)
Member (E)



(Muhammad Jamal Khan)
Member (J)


19.11.2020

Junior counsel for appellant present.

Zara Tajwar learned Deputy District Attorney for respondents present.

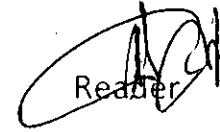
A request for adjournment was made as issue involve in the instant case is pending before Larger Bench of this Tribunal. Adjourned. To come up for arguments on 02.02.2021 before D.B.


(Atiq ur Rehman Wazir)
Member (E)


(Rozina Rehman)
Member (J)

6.5 .2020

Due to COVID19, the case is adjourned to
17/7 /2020 for the same as before.


Reader

17.07.2020

Due to COVID-19, the case is adjourned to 14.09.2020
for the same.



Reader

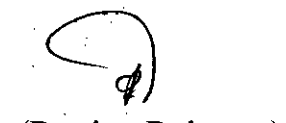
14.09.2020

Junior counsel for appellant present.

Mr. Kabirullah Khattak learned Additional Advocate
General for respondents present.

Former requests for adjournment as senior counsel is
busy in Abbottabad; adjourned. To come up for rejoinder
and arguments on 28.09.2020 before D.B.


(Attiq ur Rehman)
Member (E)


(Rozina Rehman)
Member (J)

17.01.2020

Due to general strike on the call of Khyber Pakhtunkhwa Bar Council, instant appeal is adjourned to 10.02.2020 for further proceedings/arguments before D.B.


Member


Member

10.02.2020


Counsel for the appellant and Mr. Kabirullah Khattak, Additional AG for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned to 17.03.2020 for arguments before D.B.


(Hussain Shah)
Member


(M. Amin Khan Kundi)
Member

17.03.2020

None for the appellant present. Mr. Ziaullah, DDA for respondents present. Due to general strike on the call of Peshawar Bar Council, the instant case is adjourned. To come up for arguments on 6.05.2020 before D.B.


(MAIN MUHAMMAD)
MEMBER


(M.AMIN KHAN KUNDI)
MEMBER

02.10.2019


Counsel for the appellant and Mr. Ziaullah, Deputy District Attorney for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned to 29.10.2019 for arguments before D.B.


(AHMAD HASSAN)
MEMBER


(M. AMIN KHAN KUNDI)
MEMBER

29.10.2019

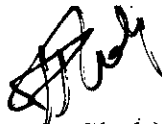
Clerk to counsel for the appellant present. Mr. Usman Ghani, District Attorney for respondents present. Clerk to counsel for the appellant seeks adjournment due to general strike of the bar. Adjourned. Case to come up for arguments on 20.11.2019 before D.B.



(Ahmad Hassan)
Member


(M. Amin Khan Kundi)
Member

20.11.2019

Counsel for the appellant and Mr. Kabirullah Khattak, Additional AG alongwith Mr. Muhammad Irfan, Assistant for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned to 17.01.2020 for arguments before D.B.


(Hussain Shah)
Member


(M. Amin Khan Kundi)
Member

24.06.2019

Learned counsel for the appellant and Mr. Zia Ullah learned Deputy District Attorney present. Adjournment requested. Adjourn. To come up for arguments on 05.08.2019 before D.B.


Member


Member

05.08.2019

Learned counsel for the appellant present. Mr. Zia Ullah learned Deputy District Attorney alongwith Irfan Ullah Assistant present. Adjournment requested. Adjourn. To come up alongwith connected service appeal of the appellant on 13.09.2019 before D.B.



Member


Member

13.09.2019

Learned counsel for the appellant and Mr. Zia Ullah learned Deputy District Attorney present. Learned counsel for the appellant seeks adjournment. Being an old case of the year 2014 adjourned by way of last chance. To come up for arguments on 02.10.2019 before D.B.

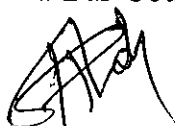

Member


Member

21.01.2019

Appellant in person present. Mr. Usman Ghani, District Attorney for the respondents present. Appellant requested for adjournment on the ground that his counsel is no available today due to strike of Khyber Pakhtunkhwa Bar Council. Adjourned to 13.02.2019 for arguments before

D.B.


(HUSSAIN SHAH)
MEMBER



(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

13.02.2019

Junior to counsel for the appellant and Mr. Ziaullah, DDA for the respondents present.

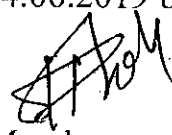
Request for adjournment is made due to over occupation of learned senior counsel for the appellant before the Honourable High Court today. Adjourned to 10.04.2019 before the D.B.


Member


Chairman

10.04.2019

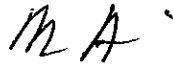
Appellant in person present. Mr. Riaz Painsakhel learned Assistant Advocate General for the respondents present. Appellant seeks adjournment as his counsel is not in attendance. Adjourn. To come up for arguments on 24.06.2019 before D.B.


Member


Member

05.09.2018

Appellant absent. Learned counsel for the appellant is also absent. However, junior counsel for the appellant present and requested for adjournment on the ground that learned senior counsel for the appellant is not available today. Mr. Ziaullah, Deputy District Attorney for the respondents present. Adjourned. To come up for arguments on 12.10.2018 before D.B.



(M. Amin Khan Kundi)
Member



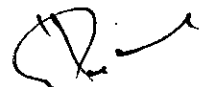
(M. Hamid Mughal)
Member

12.10.2018

Junior to counsel for the appellant and Mr. Usman Ghani learned ~~Deputy~~ District Attorney for the respondents present. Junior to counsel for the appellant seeks adjournment that his senior counsel is not in attendance. Adjourned. To come up for arguments on 28.11.2018 before D.B



Member



Member

28.11.2018

Junior to counsel for the appellant and Mr. Muhammad Riaz Painsa Khel, Asstt. AG for the respondents present.

The former requests for adjournment due to indisposition of learned senior counsel for the appellant. Adjourned to 21.1.2019 for arguments before the D.B.




Member

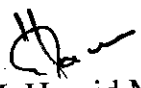


Chairman

09.01.2018

Clerk to counsel for the appellant and Asst: AG for respondents present. Clerk to counsel for the appellant seeks adjournment as counsel for the appellant is not in attendance. Adjourned. To come up for arguments on 02.03.2018 before D.B.



(Ahmad Hassan)
Member(E)


(M. Hamid Mughal)
Member (J)

02.03.2018

Counsel for the appellant and Mr. Muhammad Riaz Painsa Khel, AAG for the respondents present. Learned counsel for the appellant seeks adjournment. To come up for arguments on 09.05.2018 before the D.B.


(Ahmad Hassan)
Member


Chairman

09.05.2018


Due to retirement of the worthy Chairman, the Tribunal is incomplete, therefore the case is adjourned. To come up for same on 17.07.2018.


Reader

17.07.2018

Junior to counsel for the appellant and Mr. Muhammad Jan, Learned Deputy District Attorney present. Junior to counsel for the appellant seeks adjournment on as senior counsel is not in attendance. Adjourned. To come up for arguments on 05.09.2018 before D.B



(Ahmad Hassan)
Member


(Muhammad Hamid Mughal)
Member

06.06.2017


Agent to counsel for the appellant and Mr. Ziaullah, Deputy District Attorney for the respondent present. Agent to counsel for the appellant requested for adjournment. Request accepted. To come up for arguments on 03.10.2017 before D.B.

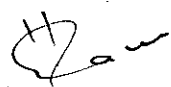
(Gul Zeb Khan)
Member


(Muhammad Amin Khan Kundi)
Member

03.10.2017


Learned Counsel for the appellant present Muhammad Jan, Learned Deputy District Attorney for the respondents present. Counsel for the appellant requested for adjournment. Adjourn. To come up for 08.11.2017 alongwith ~~man~~ connected another appeal.



Member
(Executive)


Member
(Judicial)

08.11.2017

Junior counsel for the appellant present. Mr. Muhammad Jan, Deputy District Attorney for the respondents also present. Junior counsel for the appellant requested for adjournment on the ground that learned senior counsel for the appellant is not available today. Adjourned. To come up for arguments on 09.01.2018 before D.B.


(Gul Zeb Khan)
Member (E)


(Muhammad Amin Khan Kundi)
Member (J)

20.10.2016

Counsel for the appellant and Mr. Muhammad Jan, GP for respondents present. Counsel for the appellant requested for adjournment. Adjournment granted. To come up for arguments on 23.02.2017.



(ABDUL LATIF)
MEMBER



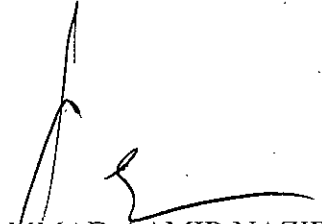
(PIR BAKHSH SHAH)
MEMBER.

23.02.2017

Clerk to counsel for the appellant and Addl: AG for respondents present. Clerk to counsel for the appellant requested for adjournment as counsel for the appellant was busy before Peshawar High Court, Peshawar. Request accepted. To come up for arguments on 06.06.2017 before D.B.



(AHMAD HASSAN)
MEMBER



(MUHAMMAD AAMIR NAZIR)
MEMBER

Appellant Deposited
Security & Process Fee

27.10.2015

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was appointed as SET in the year 1986 and allowed graded pay on the basis of professional qualification of B.Ed on 17.12.1992. That junior colleagues of the appellant were granted selection grade with effect from 6.12.2007 while appellant ignored despite entitlement and hence he preferred departmental appeal on 12.4.2014 which was not responded and hence the instant service appeal on 12.8.2014 later on amended on 11.8.2015.

That the appellant is entitled to selection grade as extended to similarly placed employees junior to appellant.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 22.2.2016 before S.B.


Chairman


22.02.2016

Counsel for the appellant, M/S Khurshid Khan, SO and Hameed-ur-Rehman, AD (lit.) alongwith Addl: A.G for respondents present. Written reply submitted. The appeal is assigned to D.B for rejoinder and final hearing for 2.6.2016 before S.B.


Chairman

2.6.2016

Counsel for the appellant and Ziaullah, GP for respondents present. Rejoinder not submitted requested for time to file rejoinder request accepted. To come up for rejoinder and arguments on 20.10.2016.


Member


Member

02.09.2015

Mr. Saqib Wazir, Advocate on behalf of the appellant present and requested for adjournment as he is to furnish Wakalat Nama and prepare the case. To come up for preliminary hearing on 22.9.2015 before S.B.


Chairman

22.09.2015

Mr. Noor Muhammad Khattak, Advocate submitted Wakalat Nama and requested for adjournment. Adjourned to 28.9.2015 for preliminary hearing before S.B.


Chairman

28.9.2015

Agent of counsel for appellant present. Requested for adjournment. Adjourned to 12.10.2015 for preliminary hearing before S.B.


Chairman

12.10.2015

Agent of counsel for the appellant present. Seeks adjournment. Adjourned to 27.10.2015 for preliminary hearing before S.B.


Chairman

28.07.2015

Appellant with counsel present. Record perused according to which appellant has preferred application for amendment in the pray portion of appeal which was allowed by the Learned Member on 7.5.2015. The appellant is directed to furnish the amended appeal in office which shall be put up before the Tribunal after scrutiny. To come up for preliminary hearing after scrutiny on 11.8.2015 before S.B.


Chairman

11.08.2015

Counsel for the appellant present. Record perused according to which appellant has submitted amended appeal which the office has entertained independently.

Since the prayer of the appellant was amendment in the pray portion of appeal as such the office is directed to entertain the amended part of appeal in the original appeal instituted earlier on 11.8.2014 where-after the same be fixed for preliminary hearing on 13.8.2015 before S.B.


Chairman

13.08.2015

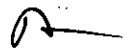
Agent of counsel for the appellant present. Seeks adjournment as learned counsel for the appellant is stated busy before the august High Court Peshawar. Adjourned to 2.9.2015 for preliminary hearing before S.B.


Chairman

6.

07.04.2015

Appellant in person present and requested for adjournment. Request accepted. To come up for preliminary hearing on 28.04.2015.



Member

7.

28.04.2015

Appellant with counsel and Mr. Ziaullah, GP for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourned for preliminary hearing to 07.05.2015 before S.B.



Member

07.05.2015

Counsel for the appellant and Asstt; AG for the respondents present. Counsel for the appellant moved an application for rectification/amendment in the pray portion of the main appeal. To come up for preliminary hearing on 18.06.2015 before S.B.



Member

18.06.2015

Appellant with counsel and Asstt; AG for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned to 28.07.2015 before S.B.



Member

3
Reader Note:

10.11.2014

Clerk of counsel for the appellant present. Since the Tribunal is incomplete, therefore, case is adjourned to 22.01.2015 for preliminary hearing.

[Signature]
Reader

4
22.01.2015

Counsel for the appellant present. Preliminary arguments partly heard. Since the matter required further elucidation, therefore, pre-admission notice be issued to the AAG with the direction to contact the respondents for submission of complete record of the appellant. To come up for preliminary hearing on 25.02.2015.

[Signature]
Member

5
25.02.2015

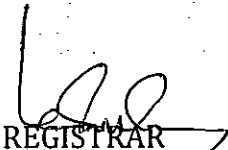
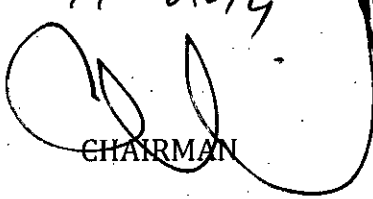
Clerk of counsel for the appellant and Asst. AG for the respondents present. Clerk of counsel for the appellant requested for adjournment. Request accepted. To come up for preliminary hearing on 07.04.2015.

[Signature]
Member

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 1058/2014

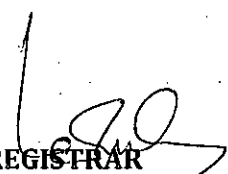
S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	20/08/2014	<p>The appeal of Mr. Mumtaz Khan resubmitted today by Mr. Ashraf Ali Khattak Advocate may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p>
2	25-8-2014	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>10-11-2014</u></p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mr. Mumtaz Khan SST, GHS Tatar Khel Distt. Karak received today i.e. on 11.08.2014 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

Annexure-F of the appeal is illegible which may be replaced by legible one.

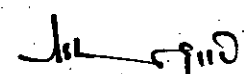
No. 1199 /S.T,

Dt. 12/8 /2014.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Ashraf Ali Khattak Adv. Pesh.


Submitted
20.08.2014 : Resubmitted after compliance


Ashraf Ali Khattak

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 1058/2014


S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	06.08.2015	<p style="text-align: center;">The amended appeal no. 1058/2014 submitted by Mr. Mumtaz Khan through Mr. Ashraf Ali Khattak Advocate was checked and found correct. To be put up before the court for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>

The amended appeal of Mr. Mumtaz Khan SST GHS Tatar Khel Distt. Karak received to-day i.e. on 31.07.2015 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copy of rules of Selection grade mentioned in para- 2 of the memo of appeal (Annexure-B) is not attached with the appeal which may be placed on it.
- 2- Annexures A to D of the appeal are illegible which may be replaced by legible/better one.
- 3- One copy/set of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1147 /S.T,

Dt. 31/7 /2015

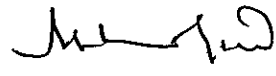

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Ashraf Ali Khattak Adv. Pesh.

Re-submitted

Objections has been completed.

Ashraf Ali

Note: Annexure "B" ~~is~~ is Notification
and not rules. 

Ashraf Ali

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,
PESHAWAR

Amended Appeal 1058/2014

Mumtaz Khan.....(Appellant)

VERSUS

The Chief Secretary Government of Khyber Pakhtunkhwa,
Civil Secretariat, Peshawar.....(Respondents)

I N D E X

S.No	Description of Documents	Annex	Pages
1.	Service Appeal		1-5
2.	Affidavit		6
3.	Addresses of the parties		7
4.	Copy of Notification of Graded Pay	A	8
5.	Copy of Notification Ends: No. 323-403/A-258 dated 04-07-1987	B	9
6.	Copy of Notification	C	10
7.	Copy of Notification	D	11
8.	Copy of Notification dated 16/01/2008	E	12-13
9.	Copy of impugned Notification	F	14-15
10.	Copy of departmental appeal	G	16
11.			

[Signature]
Appellant

Through

Dated: 28/07/2015

[Signature]
Ashraf Ali Khattak
Advocate High Court,
Peshawar.
Cell No. 0332-9931676

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,
PESHAWAR

Amended Appeal No. 1058 / 2014

Mumtaz Khan SST, Government High School Tatar Khel
District Karak.....(Appellant)

VERSUS

N.W.F. Province
Service Tribunal
Diary No. 911
dated 31-7-2015

1. The Chief Secretary Government of Khyber Pakhtunkhwa,
Civil Secretariat, Peshawar.
2. The Secretary Education (E&SE) Government of Khyber
Pakhtunkhwa, Civil Secretariat, Peshawar.
3. The Director Education (E&SE) Government of Khyber
Pakhtunkhwa, Dabgari Garden, Peshawar.
4. The District Education Officer (E&SE) District Karak.
.....(Respondents)

AMENDED APPEAL

APPEAL U/S 4 OF THE N.W.F.P (KHYBER
PAKHTUNKHWA) SERVICE TRIBUNAL ACT 1974
AGAINST THE DENIAL OF RESPONDENTS OF NON
GRANTING SELECTION GRADE FROM THE DATE
OF APPELLANT'S REGULAR ENTRY INTO
SERVICE AND AGAINST WHICH HE FILLED
DEPARTMENTAL APPEAL WHICH STILL
PENDING WITHOUT DISPOSAL.

re-submitted to-day
and filed.

31/7/15
8/8/15

PRAYER:

On acceptance of the instant Service Appeal, this Hon'ble Tribunal may graciously be pleased to direct the respondents to grant the appellant his due right of selection grade from the dated of his regular entry into service as to his other colleagues have been granted.

Respectfully Sheweth:

Facts giving rise to the present Service Appeal are as under:

FACTS:

1. That appellant has been serving as SET's (Technical). He has been regularized against his post in the year, 1992 (Annexure-A). He has got longstanding service at his credit with unblemished and clean sheeted conduct record.
2. That the Government of Khyber Pakhtunkhwa vide Notification Endst: No. 323-403/A-258 dated 04/07/1987 (Annexure-B) has announced selection Grade (BPS-17) (Personal) in favour of SET (Technical) on the basis of 1/3 Formula.
3. That it is pertinent to mention here that respondent No. 2 vide his separate notification (Annexure- C&D) has awarded selection grade in favour of number of SET (Technical) with effect from the date of their regular appointment.

4. That it is also pertinent to mention here that respondent No. 3 vide notification dated 16/01/2008 has also awarded (selection grade) in favour of numbers of other SET (Technical) with effect from the date of their regular appointment as SET (Technical) (Annexure-E).
5. That the appellant has also entitle to treated at par with his colleagues, who have been awarded selection grade with effect from the date of their regular entry in service as SET (Technical) but the sanctioning authority have treated the appellant differently and has deprived the appellant from award of selection Grade.
6. That being aggrieved from the impugned notification, appellant preferred departmental appeal/ review (Annexure-G), but no heed has been paid to the legitimate request of the appellant till the date, hence the instant appeal inter alias on the following grounds:

GROUND:

- A. That the respondents have not treated the appellant in accordance with law, rules and policy and acted in violation of Article 2 of the Constitution of Islamic Republic of Pakistan, 1973. Appellant was entitled to be awarded selection grade with effect from the date of his regular appoint as per spirit of policy,

but have been deprived of his legitimate right without any lawful justification, which is illegal, unlawful and against natural justice, therefore, this Hon'ble Tribunal has got the jurisdiction to interfere with the require the respondent to take exercise and award up-gradation/ selection grade in favour of the appellant with effect from the date of his regular entry into service as SET (Technical).

- B. That appellant has been discriminated selection grade in favour of other SET (Technical) have been awarded with effect from the date of their regular entry into service and whereas, appellant treated differently, which is against the provision of Article 25 and 27 of the Constitution of Islamic Republic of Pakistan, 1973.
- C. That all public powers are in the nature of trust and public functionaries must act as repository of such trust. In the instant case, appellant had legitimate right to be awarded selection grade with effect from the date of his regular entry into service, but have been denied of the same, which violation of public trust.
- D. That appellant was entitled to be treated at par with his other colleagues and awarded up-gradation with effect from the date of his regular entry into service, but have been denied the same benefits, which has been awarded to his other colleagues. This act of the

respondents is against the spirit of law laid down by the August Supreme Court of Pakistan.

- E. That appellant would like to seek the permission of this Hon'ble Tribunal to advance some more grounds at the time of hearing.

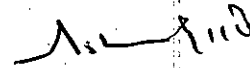
It is, therefore, humbly prayed that the appeal may kindly be accepted/ allowed as prayed for above.

Any other relief deem appropriate under the law and rules may also be graciously granted.



Appellant

Through



Dated: 28/07/2015

Ashraf Ali Khattak
Advocate High Court,
Peshawar.

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No. ____/2015

Mumtaz Khan.....(Appellant)

VERSUS

The Chief Secretary Government of Khyber Pakhtunkhwa,
Civil Secretariat, Peshawar.....(Respondents)

AFFIDAVIT

I, Mumtaz Khan SST, Government High School Tatar
Khel District Karak, do hereby solemnly affirm and declare,
that all the contents of accompanying Service Appeal are true
and correct to the best of my knowledge and belief and nothing
has been kept concealed from this Hon'ble Tribunal.



[Signature]
DEPONENT

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

Service Appeal No. ____/2015

Mumtaz Khan.....(Appellant)

VERSUS

The Chief Secretary Government of Khyber Pakhtunkhwa,
Civil Secretariat, Peshawar.....(Respondents)

ADDRESSES OF THE PARTIES

APPELLANT:

Mumtaz Khan SST, Government High School Tatar Khel
District Karak.

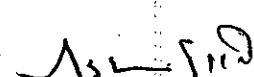
RESPONDENTS:

1. The Chief Secretary Government of Khyber Pakhtunkhwa,
Civil Secretariat, Peshawar.
2. The Secretary Education (E&SE) Government of Khyber
Pakhtunkhwa, Civil Secretariat, Peshawar.
3. The Director Education (E&SE) Government of Khyber
Pakhtunkhwa, Dabgari Garden, Peshawar.
4. The District Education Officer (E&SE) District Karak.


Appellant

Through

Dated: 28/07/2015


Ashraf Ali Khattak
Advocate High Court,
Peshawar.

Amx: A

OFFICE OF THE DIRECTOR, SECONDARY EDUCATION, NWFP, PESHAWAR.

GRADED PAY

Consequent upon the decision of NWFP Service Tribunal, announced on 23-9-1994, Mr: Mumtaz Khan, W.I, Govt; High School, NO:1, Hangu (Kohat), is hereby allowed graded pay scale in E-16 with effect from the date of his declaration MA (Technical Education) Examination results.

(SYED ABU SALEM BACILA)
DIRECTOR, SECONDARY EDUCATION,
NWFP, PESHAWAR.

Encl: NO: 3026-30/A-14/G.Pay/SER/Vol:3/95 Dated Pesh, the 2/5/1998.

Copy forwarded to the:-

1. Divl. Director of Education (S) Kohat, Division Kohat.
2. District Education Officer (M) Secondary, Kohat.
3. District Accounts Officer, ~~Kohat~~ Kohat.
4. Headmaster, Govt; High School, NO:1, Hangu.
5. Teachers concerned.

Aziz
DIRECTOR, SECONDARY EDUCATION,
NWFP, PESHAWAR.

SYED ABU SALEM BACILA/

True Copy

[Signature]

OFFICE OF THE DIRECTOR SECONDARY EDUCATION, NWFP,
PESHAWAR

ORDER PAY:

Consequent upon the decision of NWFP, Services Tribunal, announced on 23.09.1996, Mr. Mumtaz Khan, W.I. Govt: High School No.I, Hangu (Kohat), is hereby allowed graded pay scale in B-16 with effect from the date of declaration MA(Technical Education) Examination results.

Sd/-
(Syed Abu Sajid Bacha)
Director Secondary Education,
Peshawar

Endst No.322630/B-14/G-Pay/Set/Vol:3/95 Dated Pesh; the 05.05.1998.

Copy forwarded to the:-

1. Divl: Director of Education () Kohat, Division Kohat.
2. District Education Officer (M) Secondary, Kohat.
3. District Accounts Officer, Kohat.
4. Headmaster, Govt: High School, No.I, Hangu.
5. Teachers conned.

Sd/-
Deputy Director Secondary
Education, NWFP, Peshawar

Copy

Copy from Saeed Ullah Jan, Secretary to Govt: of NWFP, Finance Department Peshawar's NO: FD/SR-I 2-45/75 dated 25.6.76 addressed to the heads of attached department in NWFP, and all other's concerned.

SUBJECT:- RE-DESIGNATION OF THE POSTS OF ASSISTANT WORKSHOP INSTRUCTOR AND WORKSHOP INSTRUCTOR AS JET (TECH:) AND SET (TECH) IN THE EDUCATION DEPARTMENT.

9

Sir,

I am directed to refer to the subject noted above and to say that the case regarding redesignation of the posts of Assistant Workshop Instructor and Workshop Instructor in the Education Department was under consideration of the Govt: for quite sometime. It has now been decided to redesignate these posts and place them in the following Revised Basic Pay Scales noted against each with immediate effect:-

A/B
to
for
12/7

EDUCATION DEPARTMENT.

S.No	Name of Post.
1.	Asstt:Workshop Instructor (to be redesignated) as Junior English Teacher(Tech:)
2.	Workshop Instructor(to be re-designated as senior English Teacher(Tech:))

Existing Basic Scales.

- i. B-8
ii. 30% of the cadre strength to be in B-11 on regular basic w/e 01.7.1982.
- i). B-14
ii). 30% of the cadre strength to be in B-16 on regular basis w/e 1.7.82.

Revised Basic Pay Scales.

- B-9 with selection grade equal to 1/3 posts in B-12.
- B-15 with selection grade equal to 1/3rd posts in B-17.

Yours Obodiently Servant,

Sd/-

(MIR LAIQ SHAH)

Additional Finance Secretary, -I Government of NWFP.

Fixation file

OFFICE OF THE DIRECTOR OF EDUCATION (SCHOOLS) NWFP, PESHAWAR.

Endst: No: 323-403/A-258/Notification Dated Peshawar the 04.7.87.

Copy of the above is forwarded for information and necessary

action to the:-

- 1- Addl:Directors, Local Directorate.
- 2- All the Divisional Director's of Education(S) in NWFP,
- 3- All the D.E.O(M&F), for further circulating their subordinate offices.
- 4- Director Bureau of Curriculum & Edu:Extension Centre, NWFP, ATD.
- 5. All the S.D.E.Os (M&F) in NWFP.
- 6. V-NE Local Directorate.
- 7. VII-VE for information, Local Directorate.

Sd/-

Deputy Director(Schools)

for/Director of Education, NWFP,

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) ABBOTTABAD.

Endst: No: 23418-517 /P.No:35/ADMO(ACAD) DATED 06 JULY 1987

Copy of the above is forwarded to the:-

1-97) The Sub Divisional Education Officers(Male)Abbottabad, Haripur and all the Headmasters of Govt: High Schools in District A. Abad for information that it has been decided by the Govt: NWFP, that the posts of W.I & AWI have been re-designate. You are requested to place them in the given revised basic pay scales noted against each with immediate effect.

98) Saeed Ullah Jan, Secretary to Govt: of NWFP, Finance Department, Peshawar with reference to his No: PD/SR-I 2-45/75 of 25.6.87.

99) Director of Education (S) NWFP, Peshawar for information please

100)

True Copy
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Copy from Saeed Ullah Jan, Secretary to Govt. of NWFP, Finance Department Peshawar's No: FD/SR-I, 2-45/75 dated 25.06.76 addressed to the heads of attached department in NWFP, and all others concerned.

Subject: **RE-DESIGNATION OF THE POSTS OF ASSISTANT WORKSHOP INSTRUCTOR AND WORKSHOP INSTRUCTOR AS JET (TECH) AND SET (TECH) IN THE EDUCATION DEPARTMENT**

Sir,

I am directed to refer to the subject noted above and to say that the case regarding re-designation of the posts of Assistant workshop Instructor and Workshop Instructor in the Education Department was under consideration of the Govt: for quits sometime. It has now been decided re-designate these posts and place them in the following Revised Basic Pay Scales noted against each with immediate effect:-

Education Department		Existing Basic	Revised basic pay Scales
Sr. No.	Name of Post		
1.	Asstt: Workshop Instructor (to be re-designated) as Junior English Teacher (Tech:)	i) B-8 ii) 30% of the oador strength to be in B-11 on regular basic wef 01.07.1982.	B-9 with selection grade equal to 1/3 posts in B-12
2.	Workshop Instructor (to be re-designated as Senior English Teacher (Tech:))	i) B-14 ii) 30% of the oador to be in B-16 on regular basis w.e.f 1.07.82.	B-15 with selection grade equal to 1/3 rd posts in B-17

Yours obediently Servant

Sd/-

(Mr Laiq Shah)

Additional Finance Secretary-I,
Government of NWFP

OFFICE OF THE DIRECTOR OF EDUCATION (SCHOOLS) NWFP, PESHAWAR

Endst No: 323-403/A/258/Notiifcation dated Peshawar the 04.07.87.

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

1. Addl: Directors, Local Directorate
2. All the Divisional Director's of Education (S) in NWFP,
3. All the D.E.O (M&F), for further circulating their subordinate offices.
4. Director Bureau of Curriculum & Edu: Extension Centre, NWFP, ATD.
5. All the S.D.Eos (M&F) in NWFP.
6. V-E Local Directorate.
7. VII-VE for information, Local Directorate.

Sd/-

Deputy Director (Schools)

For/Director of Education, NWFP

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) ABBOTTABAD

Endst No: 23418-517/F.No:35/ADEO(ACAD) dated 06.July, 1967

Copy of the above is forwarded to the:-

- 1-97) The Sub Divisional Education Officers (Male) Abbottabad, Haripur and all the Headmasters of Govt: High Schools in District A.Abad for information that it has been decided by the Govt: NWFP, that the posts of W.I & AWI have been re-designate. You are requested to place them in the given revised basic pay scales noted against each with effect.
- 98) Saeed Ullah Jan, Secretary to Govt: of NWFP, Finance Department, Peshawar with reference to his No.FD/SR-I 2-45/75 of 25.06.87.
- 99) Director of Education (S) NWFP, Peshawar for information please.
- 100) (sic)

NOTIFICATION

NO: S.O(S) 1-7/87/ In pursuance of orders contained in Government of NWFP, Finance Department circular letter No: FD(SR.I) 2-45/75 dated, 25.6.1987, the Provincial Government are pleased to award BS-17 as selection grade to the following Senior English Teachers (Technical) (formerly Workshop Instructors) with effect from 25.6.1987:-

Anx: C

10

1. Mr. Firdous Khan Govt. Tech. High School Peshawar City.
2. Mr. Niaz Mohammad, Govt. High School Dabkor (Mohmand Agy.)
3. Mr. Samiullah Govt. Elementary Coll. Jamrud (Khyber Agency)
4. Mr. Sultan Bahadar Govt. High School No: I Haripur.
5. Mr. Ghayoor Pervez Govt. Comp. High School Kohat, Sharif (Swat).
6. Mr. Mohammad Sharif Govt. High School Wadudia Saidu
7. Mr. Ghous Ali. ----- do -----
8. Mr. Zia-ud-Din ----- do -----
9. Mr. Abdul Azim ----- do -----
10. Mr. Inshallah Khan Govt. High School No: I Nowshera Cantt.
11. Mr. Mohammad Nisar G.A.T.T.T.C, Peshawar.
12. Mr. Hidayatullah G.A.T.T.T.C, Peshawar.
13. Mr. Aniq Ahmad G.A.T.T.T.C, Peshawar.
14. Mr. Mohammad Ishaq G.A.T.T.T.C, Peshawar.
15. Mr. Ashfaq Ahmad Govt. High School No: 2 Peshawar City.
16. Mr. Jehan Zeb Govt. High School No: 4 Kakshal Peshawar.
17. Mr. Mohammad Salim Govt. High School Shahbaz Garhi (Mardan)
18. Mr. Mohammad Iqbal Govt. High School No: 2 Peshawar City.
19. Mr. Miftah Gul Govt. High School Pabbi (Nowshera)
20. Mr. Mohammad Aslam Govt. High School Turbela Township.
21. Mr. Hamidullah Khan Govt. High School Paharpur (D.I. Khan)
22. Mr. Mumtaz Khan Govt. High School No: I Kulachi.
23. Mr. Janshaid Ashraf Govt. High School No: I D.I. Khan.
24. Mr. Aurang Zeb Govt. High School No: I Tank (D.I. Khan)
25. Mr. Abdus Majeed Govt. High School No: 2 D.I. Khan.
26. Mr. Mohammad Safdar Govt. High School No: 3 D.I. Khan.
27. Mr. Rehmatalah Govt. High School Kirman Kurram Agency.

IPTIKHAR-UD-DIN
Secretary to Govt. of NWFP
Education Department.
DATED PESH. THE 24.2.1988.

Endst: NO: S.O(S) 1-7/87.

Copy forwarded for information & action to:-

1. Accountant General NWFP, Peshawar.
2. Director of Education (Schools) NWFP, Peshawar.
3. Director of Education (PATA) NWFP, Peshawar.
4. Director Bureau of Curriculum Development and Education Extension Services A/Abad.
5. All Divisional Directors of Education (Schools) in NWFP, A/Abad and D.I. Khan.
6. District Accounts Officers, Haripur, Kohat, Swat, Mardan, A/Abad and D.I. Khan.
7. Agency Accounts Officers, Mohmand, Khyber and Kurram Agy.
8. Manager Govt. Printing Press Peshawar.
9. Officials concerned.

Javed*W

(SAHIBZAD FAZAL AMIN)
Section Officer (Schools)

24/2/88

Asst. Dist. Edu. Officer
(NID) Fy: Peshawar.

True Copy
J

DEPARTMENT OF NWFP
EDUCATION DEPARTMENT
DATED PESHAWAR THE 24.02.1988

NOTIFICATION/

No.S.O(S)1-7/87: In pursuance of orders contained in Government of NWFP, Finance Department circular letter NO.FD(SR.I)2-45/75 dated, 26.06.1987, the Provincial Government are pleased to award BS-17 as selection grade to the following Senior English Teachers (Technical) (formerly Workshop Instructors) with effect from 26.06.1987.

1. Mr. Firdour Khan Govt. Tech: High School Peshawar City.
2. Mr. Niaz Mohammad, Govt. High School Dakkor (Mohmand Agy).
3. Mr. Samiullah Govt. Elementary Coll: Jamrud (Khyber Agency)
4. Mr. Sultan Bahadar Govt. High School No.I, Haripur
5. Mr. Ghayoor Pervez Govt. Comp: High School Kohat.
6. Mr. Mohammad Sharif Govt. High School Wadudia Saidu Sharif (Swat).
7. Mr. GHous Ali. -----do-----
8. Mr. Zia-ud-Din -----do-----
9. Mr. Abdul Azim -----do-----
10. Mr. Inshallah Khan Govt. High School No.1 Nowshera Cantt.
11. Mr. Mohammad Nisar G.A.T.T.T.C, Peshawar.
12. Mr. Hidayatullah C.A.T.T.T.C, Peshawar.
13. Mr. Aniq Amad G.A.T.T.T.C, Peshawar.
14. Mr. Mohammad Shaq G.A.T.T.T.C, Peshawar
15. Mr. Ashfaq Ahmad Govt. High School No.2 Peshawar City.
16. Mr. Jehan Zeb Govt. High School No.4 Kakshal Peshawar.
17. Mr. Mohammad Salim Govt. High School Shahbaz Garhi (Mardan)
18. Mr. Mohammad Iqbal Govt. High School No.2 Peshawar City.
19. Mr. Miftah Gul Govt. High School Pabbi (Nowshera)
20. Mr. Mohammad Aslam Govt. High School Turbela Township
21. Mr. Hamidullah Khan Govt. High School Paharpur (D.I.Khan)
22. Mr. Mumtaz Khan Govt. High School No.I, D.I.Khan.
23. Mr. Jamshaid Ashraf Govt. High School No.I, D.I.Khan
24. Mr. Auranz Zeb Govt. High School No.I, Tank (D.I.Khan)
25. Mr. Abdul Majeed Govt. High School No.2, D.I.Khan
26. Mr. Mohammad Safdar Govt. High School No.3, D.I.Khan.
27. Mr. Rehmaullah Govt. High School, Kirman Kurram Agency

Sd/-
Iftikhar-ud-Din
Secretary to Govt. of NWFP
Education Department

Endst No.S.O (S) 1-7/87

Copy Forwarded for information & n/action to:-

1. Accountant General NWFP, Peshawar
2. Director of Education (Schools) NWFP, Peshawar.
3. Director of Education (FATA) NWFP, Peshawar
4. Director Bureau of Curriculum Development and Education Extension Services A/bad.
5. All Divisional Directors of Education (Schools) in NWFP.
6. Agency Accounts Officers, Mohamand, Khyber and Kurram Agy.
7. Manager Govt. Officers, Mohamand, Khyber and Kurram Agy.
8. Officials Concerned.

Sd/-
(Sahibzada Fazal Amin)
Section Officer (Schools)

Already recorded

Total 37

GOVERNMENT OF N.W.F.P.
EDUCATION DEPARTMENT
DATED PESHAWAR THE 4.9.1988

2-10 (11)

NOTIFICATION

NO: S.O(S)1-7/87/ In pursuance of orders contained in Govt. of NWFP, Finance Department circular letter No: ED(SR, I)2-45/75 dated, 25.6.1987, the Provincial Government are pleased to award BS-17 as selection grade to the following Senior English Teachers (Technical) (Formerly Workshop Instructors) with effect from 25.6.1987:-

Anx: D

(11)

1. Mr. Mohammad Zahid G.H.S. Khal (Dir)
2. Mr. Karim Jan G.H.S. No. 2 Peshawar City
3. Mr. Jamshaid Khan G.H.S. Bughdada (Mardan)
4. Mr. Mashal Nawaz G.H.S. Habibullah Khan FR-Bannu

SECRETARY TO GOVT. OF NWFP
EDUCATION DEPARTMENT.

Endst: NO: S.O(S)1-7/87. DATED PESH: THE 4.9.1988.

Copy forwarded for information & n/action to:-

1. Accountant General NWFP, Peshawar.
2. Director of Education (Schools) NWFP, Peshawar.
3. Director of Education FATA, NWFP, Peshawar.
4. Director Bureau of Curriculum Development and Education Extension Centre A/Abad.
5. Divisional Directors of Education (Schools), Peshawar, Mardan and Malekand Divisions.
6. District Accounts Officers, Dir, Mardan and Bannu.
7. Manager Govt. Printing Press Peshawar.
8. Officials concerned.

(SAHIBZADE TAZAL AMIN)
Section Officer (Schools)

Javed#N/

27. Mr. Muhammad Qaim SET GHSS Bannu
28. Mr. Abdur Rahim SET GHS Khar (Bajour Agy.) C9.02.1988.

N/P..2..

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GOVERNMENT OF NWFP
EDUCATION DEPARTMENT
DATED PESHAWAR THE 04.09.1988

NOTIFICATION:-

No:S.O(S)1-7/87/- In Pursuance of orders contained in Govt. of NWFP, Finance Department circular letter No.FD(SR,I) 2-45/75 dated, 25.06.1987, the Provincial Government are pleased to award BS-17 as selection grade to the following Senior English Teachers (Technical) (Formerly Workshop Instructors) with effects from 26.06.1987.

1. Mr. Mohammad Zahid G.H.S. Khal (Dir)
2. Mr. Karim Jan G.H.S No.2, Peshawar City
3. Mr. Jamshaid Khan G.H.S, Bughdada (Mardan)
4. Mr. Mashal Nawaz G.H.S Habibullah Khan, FR-Bannu.

Sd/-
Secretary to Govt of NWFP
Education Department

Endst: No.S.O(S)1-7/87

Dated Peshawar, the 04.9.1988

Copy forwarded for information & n/action to:-

1. Accountant General NWFP, Peshawar
2. Director of Education (Schools) NWFP, Peshawar.
3. Director of Education FATA, NWFP, Peshawar.
4. Director Bureau of Curriculum Development and Education Extension Centre A/Abad.
5. Divisional Directors of Education (Schools), Peshawar Mardan and Malakand Divisions.
6. District Accounts Officers, Dir, Mardan and Bannu
7. Manager Govt, Printing Press Peshawar.
8. Officials concerned

Sd/-
Sahibzada Fazal Amin
Section Officer (Schools)

OFFICE OF THE DIRECTOR SCHOOLS & LITERACY N.W.F.P., PESHAWAR.

NOTIFICATION.

Anx: E

12

12

Consequent upon the approval of the Departmental Promotion Committee (DPC) accorded in its Meeting held on 05.12.2007, the Director Schools & Literacy N.W.F.P., Peshawar is pleased to allow Selection Grade from EPS-16 to, EPS-17 in respect of the following SETs (Tech:) of the School Administration Branch (Men Section) with effect from the dates noted against their names:-

S.No.	Name/Designation/Address.	Awarded S/Grade with effect from.
01.	Mr. Niamatullah SET (Tech:) GHSS No. 1 Tank.	25.06.1987. ✓
02.	Mr. Fazlur Rohman SET GHS Akhurwal (FR-Kohat).	25.06.1987.
03.	Mr. Muhammad Ismail SET GHS Akhurwal (FR-Kohat).	25.08.1987.
04.	Mr. Yaqub Khan SET GHS Titer Khel, Lakki.	01.10.1987.
05.	Mr. Muhammad Ayaz Khan SET GHS Karak.	03.10.1987.
06.	Mr. Zahir Shah SET GHS Latamber, Karak.	05.10.1987.
07.	Mr. Ammar Mawaz SET GHS No. 1 Lakki.	04.10.1987.
08.	Mr. Muhammad Hasrat Khan SET GHS No. 1, H. Pur.	22.10.1987.
09.	Mr. Aftab Ahmad Shah SET GHS No. 2, Haripur.	23.10.1987.
10.	Mr. Zaffar Ahmad SET GHS No. 2, Abbottabad.	23.10.1987.
11.	Mr. Muhammad Beshir Khan SET GHS No. 2, A. Abad.	23.10.1987.
12.	Mr. Hameedullah Shah SET GHS T/Nasrati, Karak.	29.10.1987.
13.	Mr. Ali Akbar SET GHS Khan (Bajour Agency).	03.11.1987.
14.	Mr. Muhammad Riaz SET GHS Kuladhand (Chd:).	15.12.1987.
15.	Mr. Fazal Dayan SET GHS Khair Abad (Mardan).	15.12.1987.
16.	Mr. Muhammad Hifzur Rehman SET GHSS Gul Bahar, Peshawar.	16.12.1987.
17.	Mr. Abdul Latif SET GHS Zaida, Swabi.	17.12.1987.
18.	Mr. Jalalud Din SET GHS Miran Shah (NWA).	09.02.1988. ✓
19.	Mr. Asmatullah SET GHSS Kaley (Orakzai).	09.02.1988. ✓
20.	Mr. Zahardast Khan SET GHS Karak.	09.02.1988. →
21.	Mr. Jehanzeb SET GHS Habibullah (FR-Bannu).	09.02.1988. →
22.	Mr. Sarwar Shah SET GHS Dab Kor (Mohmand Agy)	09.02.1988. →
23.	Mr. Rahim Gul SET GHS Mohammad Khan Killi (Khyber Agency).	09.02.1988. →
24.	Mr. Noorud Din SET GHS Habibullah (FR-Bannu)	09.02.1988. →
25.	Mr. Sultan Muhammad SET GHS Mohammad Khan Killi (Khyber Agency).	09.02.1988. →
26.	Mr. Majidullah SET GHS Dab Kor (Mohmand Agy:)	09.02.1988. →
27.	Mr. Muhammad Qaim SET GHSS Batkhela (Mkd:)	09.02.1988. →
28.	Mr. Abdur Rahim SET GHS Khan (Bajour Agy:)	09.02.1988. →

N/P..2..

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29.	Mr. Badshah SET	09.02.1988.
30.	Mr. Hakim Khan SET	09.02.1988. →
31.	Mr. Mushtaq Ahmad SET GEC(M) Jamrud.	09.02.1988. →
32.	Mr. Hissar Khan SET GHS Shamshtoo (FR-Pesh.)	09.02.1988. →
33.	Mr. Sher Zaman SET GHS Hq. 1 Kulachi (DIKhan)	09.02.1988. →
34.	Mr. Muhammad Hassan SET GHS Zoran (Khy: Agy.)	09.02.1988. →
35.	Mr. Insanullah SET GHS No. 2 D.I. Khan.	09.02.1988. →
36.	Mr. Amir Azam SET GHS No. 1 Manshra.	09.02.1988. →
37.	Mr. Qayum Nawaz SET GHS Kotjai (DIKhan).	09.02.1988. →
38.	Mr. Fazal Mañan SET GHS No. 1 Takhtbai (Mdn.)	09.02.1988. →
39.	Mr. Muhammad Javed SET GHSS Barra (Manshra)	09.02.1988.
40.	Mr. Muhammad Sulman SET GHSS No. 2 Mingora.	09.02.1988.
41.	Mr. Muhammad Salim SET GHS Batkhela (Mkd.)	09.02.1988.
42.	Mr. Muhammad Salim SET GHS Wanda Lali (DIK)	09.02.1988.
43.	Mr. Ghulam Farida Din SET -do-	09.02.1988.
44.	Mr. Abdul Majeed SET GHS No. 2 D.I. Khan.	09.02.1988.
45.	Mr. Fazle Maula SET GHS Mohammad Khan Killi Khyber Agency.	09.02.1988.
46.	Mr. Ajmir Shah SET GHSS Pir Pal (Newsheera).	11.03.1988.
47.	Mr. Muhammad Ayub SET GHS Panyala (DIKhan)	29.03.1988.
48.	Mr. Tehmash Khan SET GHS Dab Kor (Mohmand)	25.05.1988.
49.	Mr. Yousaf Ali SET GHS Timergara Dir (L).	07.09.1988.
50.	Mr. Muhammad Royas SET GHSS Gulbahar, Pesh.	15.01.1989.
51.	Mr. Shahnavaz SET GHS Adzai (K/Agency).	15.01.1989.
52.	Mr. Ibrar Ahmad SET GHS Kohat.	29.01.1989.
53.	Mr. Zulfiqar Ali SET GHSS Manshra.	04.02.1989.
54.	Mr. Sabz Ali SET GHS Nitha Khel, Karak.	04.02.1989.
55.	Mr. Salahud Din SET GHS Khur (Bajour Agency).	04.02.1989.
✓ 56.	Mr. Raziuz Zaman SET GHS No. 1 Panarpur (DIK).	04.02.1989.

— Sol —
DIRECTOR SCHOOLS & LITERACY
N.W.F.P., PESHAWAR.

Encl: No. 1337-55/A-14/SET (Tech.) S/G. Dated Pesh: 16/1/2008.

Copy forwarded for information and n/action to the:-

1. Accountant General NWFP, Peshawar.
2. Director of Education (FATA) NWFP, Peshawar.
3. Executive District Officers (S&L) concerned.
4. District Accounts Officers concerned.
5. Agency Education Officers concerned.
6. Agency Accounts Officers concerned.
7. Principals/Headmasters concerned.
8. Section Officer (Primary) S&L Deptt. Govt. of NWFP in to his letter No. SO (FE) S&L/D/ 2-6/100 Meeting/07 dated 15.01.2008.
9. Teachers concerned: (10) PA to Director S&L L. Office.

Deputy Director (Establishment)
Schools & Literacy NWFP, Peshawar.

PA/10/100

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GOVERNMENT OF KHYBER PAKHTUNKHWA
 ELEMENTARY & SECONDARY EDUCATION
 DEPARTMENT
 Dated Peshawar 25-05-2010

NOTIFICATION

NO. SO(PE)2-C/E&SED/DPCMTG/UPGRADATION/10: The Competent Authority on the recommendation of the Departmental Promotion Committee and consultation with Finance department is pleased to allow up-gradation from BS-1 to BS-17 (Personal) to the following 1013 Male SETs (317 Female SETs and 14 Male SET (Tech) with immediate effect subject to the condition that the post of SET shall be downgraded from BS-17 to BS-16 as and when vacated by the incumbents.

1013 MALE SET (GEN)

S.No	Seniority List No.	Name of Officer	Date of Appointment as Regular SET	Present Place of Posting
1.	1286(A)	Nazir,ud din	12.6.88	SET G.H.S.S. Shamozai Swat
2.	1756	Mohammad Khalid	09-10-89	SET G.H.S. Khollan, Pafk, Haripur
3.	1984(A)	Muhammad Naeem Shah	7.4.98	SET G.H.S. Naryab, Hengo
4.	2274(A)	Syed Jamil Ahmad Shah	11-1-91	SET G.H.S. Ghora, Sarton, A. Abad
5.	2335-a	Muhammad Zaman	27-07-91	SET G.H.S. Khraji, FR, Faisalabad
6.	2337(B)	Malik Jan	11.8.91	SET G.H.S. Darra, Mandi Bahauddin
7.	2337(D)	Muhammad Raza	15-04-93	SET G.H.S. Jamrud, Faisalabad
8.	2337(E)	Ahmad Nizam	28-04-93	SET G.H.S. Sadder, Kurram Agency
9.	2337(F)	Ghulam Habib	29-04-93	SET G.H.S. Ashkar, Kohat, SWA
10.	2337(G)	Taj Mohammad Khan	5-3-94	SET G.H.S. Kori, Naryab, Ullah, Haripur
11.	2628	Muhammad Farooq Khan	10-11-94	ADD (AEO) Fala
12.	2703(10)	Faqir Mohammad	21-05-95	SET G.H.S. Tarnab, Charsadda
13.	2717	Mr. Fazil Khalid	23-5-95	SET G.H.S. Mulla, Jambank
14.	3439-a	Akbar Ali	10-02-96	SET G.H.S. Hisara, Pafk, Khyber
15.	3439-b	Kamil Khan	10-02-96	SET G.H.S. Sanikhal, FR, Kohat
16.	3530	Muhammad Hussain	25-3-96	G.H.S. No. 2, Pahar, D.I. Khan
17.	3714	Mr. Rafiq ul Ahmad	25-3-96	SET G.H.S. Chirra
18.	4025(1)	Nasrullah Jan	6-5-96	SET G.H.S. Shagai, Khyber
19.	4025(19)	Sultan Farooq	9-3-96	SET GEC Mir Ali, N.W.A.
20.	4025(20)	Saad Ullah Khan	18-11-97	SET G.H.S. Palang, Pafk, N.W.A.
21.	4027	Mr. Zia Ahmed	15-1-98	SET G.H.S. Dheri, Khattak, Kohat, N.W.A.
22.	4030	Mr. Abdullah	15-1-98	G.H.S. Duttakara, Swat
23.	4032	Mr. Masoodur Rehman	15-1-98	SET G.H.S. Kanigoram, SWA
24.	4033	Mr. Mazhar Munir	15-1-98	G.H.S. No. 4, D.I. Khan
25.	4034	Mr. Mutehir shah	15-1-98	SET G.H.S. Tor, Landi, Swat
26.	4036	Mr. Muhammad Hussain	15-1-98	SET G.H.S. Abu Khalid, Kohat

Approved: _____
 To be signed: _____
 True Copy
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GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Dated Peshawar 25-05-2010

NOTIFICATION

NO.SO(PE)2-6/E&SED/DPCMTG/UPGRADATION/10: The Competent Authority on the recommendation of the Departmental Promotion Committee and consultation with Finance Department is pleased to allow up-gradation from BS-1 to BS-17 (Personal) to the following 1013 Male SETs, 3471 Female SETs and 1 Male SET (Tech) with immediate effect subject to the condition that the post of SET shall be downgraded from BS-17 to BS-16 as and when vacated by the incumbents:-

1013 MALE SET (GEN)

S.No	Seniority List No.	Name of Officer	Date of Appointment as Regular SET	Present Place of Posting
1	1286(A)	Nazir ud din	✓ 12.6.88	SET GHSS Shamozaï Swat
2	1756	Mohammad Khalid	09.10.89	SET GHS Kholianibala Haripur
3	1954(A)	Muhammad Naeem Shah	7.4.98	SET GHS Naryab Hango
4	2274(A)	Syed Jamil Ahmad Shah	11.1.91	SET GHS Ghora Bazran A:Abad
5	2330-b	Muhammad Zamin	27.07.91	SET GHS Khragi FR-Tank
6	2337(B)	Malik Jan	11.8.91	SET GHS Dara Adam Khel FR Kohat
7	2337(D)	Muhammad Riaz	15.04.93	SET GHSS Jamrud
8	2337(87)	Ahmad Khan	20.04.93	SET GMHS Sadda Kurram Agy
9	2337(88)	Ghulam Habib	20.04.93	SET GHS Askari Kot SWA
10	2337(86)	Taj Mohammad Khan	5.3.94	SET GHSS Kot Najeebullah Hango
11	2628	Muhammad Farooq Khan	10.11.94	ADO (AEO) Fata
12	2708(10)	Faqir Mohammad	21.05.95	SET GHSS Tarnaab Charsadda
13	2717	Mr. Fazli Khaliq	23.5.95	SET GHS Mullazai Tank
14	3489-a	Akbar Ali	10.02.96	SET GHS Hisara Bara Khyber Agy
15	3489-b	Kamil Khan	10.02.96	SET GHS Sani Khel FR Kohat
16	3530	Mulazim Hussain	25.3.96	GHS No.2 Paharpur DIK
17	3714	Mr. Rafiq ul Ahmad	25.3.96	SET GCMS Chitral
18	4025(1)	Noorullah Jan	6.5.96	SET GHS Shagai Khyber
19	4025(19)	Sultan Farooq	8.3.90	SET GEC Mir Ali NWA
20	4025(20)	Saad Ullah Khan	18.11.97	SET GMS Palanzai NWA
21	4027	Mr. Zia Ahmed	15.1.98	SET GHS Dheri Khattak Khel NSR
22	4030	Mr. Abdullah	15.1.98	GHS Batakara Swabi
23	4032	Mr. Masoodur Rehman	15.1.98	SET GHS Kanigoram SWA
24	4033	Mr. Mazhar Munir	15.1.98	GHSS No.4 DIKhan
25	4034	Mr. Mutahir Shah	15.1.98	SET GHS Tor Landi Swabi
26	4036	Mr. Munawwar Hussain	15.1.98	SET GHSS Abu Khel Lakki

DIRECTORATE OF SCHOOLS & LITERACY
N.W.F.P. PESHAWAR

1987-88

NO. 1987-88/1000

DATED PESHAWAR THE 10/1/87

To

1. The Director of Education
PATA, NWFP, Peshawar.

2. The Director of Curriculum & Texts Education
NWFP, Peshawar.

3. All the Executive District Officers
(S.I.) in NWFP.

ALLIANCE NWFP DATA CORRECTED UP TO 30-09-87
TECHNICAL (M.A.) OF SCHOOLS & LITERACY
N.W.F.P. PESHAWAR

A copy of the final Seniority List of SET (Technical) (M.A.) is enclosed herewith for information of all concerned who are working under your jurisdiction. The said Seniority List should be brought into the notice of all SETs (Tech) and their signatures (for having seen and checked the list thoroughly) should be obtained from them and kept in your office for record.

DEPUTY DIRECTOR (ESTABLISHMENT)
SCHOOLS & LITERACY, NWFP, PESHAWAR

1987-88

Copy of the above is forwarded for information to:-

- 1. Assistant Director (Liaison) Local Directorate
- 2. P.S. to Secretary, Schools & Literacy, Deptt. Govt. of NWFP.
- 3. P.A. to Director Schools & Literacy, NWFP, Peshawar.

BY: DIRECTOR (ESTABLISHMENT)
SCHOOLS & LITERACY, NWFP, PESHAWAR

REVISED

FINAL SENIORITY LIST OF SETs (TECHNICAL) OF SCHOOLS AND LITERACY NWFP/ FATA CORRECTED UP TO 30-06-2007.

S.No	NAME & DESIGNATION OF SET TECHNICAL	D.O.Birth	Domicile	Date of 1st Appt In Edu; Deptt	Date of Apptt as SET, Tech:	Date of Approval as SET(Tech)	Remarks
	Mr. Mumtaz Khan, ASDE(M) Kulachi D.K	15.12.1951	D.I.Khan	25.03.1972	08.05.1974	08.05.1974	
21	Mr. Muhammad Zahid, SET, GHS, Kha: Div ✓ (P-9)	05.04.1952	Dir	03.07.1972	13.11.1975	13.11.1975	
22	Mr. Ashfaq Ahmad, SET, GHS, No.2 Pesh: City //	08.01.1952	Peshawar	01.10.1976	01.10.1976	01.10.1976	
23	Mr. Muhammad Iqbal, SET, GHS, No.2 Pesh: City //	19.05.1956	Peshawar	03.11.1976	03.11.1976	03.11.1976	
24	Mr. Muhammad Nisar, ASDO(M) Peshawar //	15.06.1952	Peshawar	06.11.1976	06.11.1976	06.11.1976	
25	Mr. Sultan Bahadar, SET, GHS, Ghazi Haripur //	19.05.1954	Haripur	05.05.1976	16.11.1976	16.11.1976	
26	Mr. Muhammad Aslam, SET, GHS, Ghazi, Haripur //	01.06.1954	Haripur	16.11.1976	16.11.1976	26.01.1978	
27	Mr. Samiullah Khan, SETGEC(M) Jamrud, Khy. Agy: //	10.04.1957	Kohat	12.02.1977	12.02.1977	12.02.1978	
28	Mr. Firdos Khan, SET, GHS, Gujbehra Peshawar //	15.09.1957	Peshawar	01.11.1972	15.03.1978	01.12.1979	
29	Mr. Muhammad Salim, SET, GHSS, Shabaz Garhi, Mdn: //	07.04.1950	Mardan	16.09.1973	01.11.1980	01.11.1980	
30	Mr. Abdul Majid, ASDO(M) D.I.Khan //	20.07.1956	D.I.Khan	22.12.1976	03.12.1980	03.12.1980	
31	Mr. Rehmatullah, SET, GHS, Akhruwal, FR Kohat //	10.10.1948	FR Kohat	15.09.1973	09.05.1981	09.05.1981	
32	Mr. Ghayour Pervez SET, GCHS, Kohat //	01.01.1953	Kohat	01.01.1978	01.01.1978	03.09.1981	
33	Mr. Miftah Gul SET, GHS, Pabbi Nowshera //	20.04.1959	Nowshera	01.10.1980	06.01.1982	15.02.1982	
34	Mr. Muhammad Ishaq Khan, SET, GATTC, Peshawar //	12.05.1956	Peshawar	01.06.1982	01.03.1982	01.03.1982	
35	Mr. Hamidullah Khan, ADEO(M) D.I.Khan //	16.06.1952	D.I.Khan	05.05.1974	01.01.1978	31.03.1983	
36	Mr. Karim Jan, SET, No.2, Peshawar City ✓ (P-10)	09.06.1959	Charsadda	25.10.1981	25.10.1981	31.03.1983	
37	Mr. Jamshaid Khan, SET, GHS, Bughdads Mardan (P-10)	14.01.1954	Mardan	13.01.1979	22.01.1984	22.01.1984	
38	Mr. Niamatullah, SET, GHSS, No.1, Tank (P-7)	15.01.1952	Tank	01.09.1975	25.10.1982	27.10.1984	
39	Mr. Fazlur Rehman, SET, GHS, Akhruwal FR Kohat (P-7)	11.12.1945	FR Kohat	05.12.1984	25.03.1987	25.03.1987	
40	Mr. Muhammad Ismail, SET, GHS, Akhruwal FR Kohat (P-7)	01.01.1953	FR Kohat	10.01.1978	25.03.1987	25.08.1987	

Handwritten notes and corrections on the left side of the table, including numbers 1 through 21, and various initials and symbols like 'P-9', 'P-10', 'P-7', and checkmarks.

							Do (Approval)	
							SET	
4	22	Mr. Yaqoob Khan, SET, Tillet khel Lakki (P-7)	02.06.1952	Lakki	22.01.1981	01.10.1987	01.10.1987	✓
5	23	Mr. Muhammad Ayaz Khan, SET, GHS, Karak (P-7)	04.11.1951	Karak	01.03.1970	03.10.1987	03.10.1987	
6	24	Mr. Zafar Shah, SET, GHS, Latamber Karak //	01.01.1945	Karak	04.04.1963	03.10.1987	03.10.1987	
7	25	Mr. Amir Nawaz Khan, GCMHS, No.1 Lakki //	02.09.1956	Lakki	28.11.1975	04.10.1987	04.10.1987	
8	26	Mr. Muhammad Hasrat Khan, SET, GHS, No.1, Haripur //	15.01.1951	Haripur	17.03.1969	22.10.1987	22.10.1987	
9	27	Mr. Aftab Ahmad Shah, SET, No.2, Haripur //	05.11.1951	Haripur	20.10.1973	23.10.1987	23.10.1987	
10	23	Mr. Mir Zafar Ahmad SET, GHS, No.2, A. Abad //	05.11.1956	Manshera	28.01.1980	23.10.1987	23.10.1987	
11	23	Mr. Muhammad Bashir Khan, SET, GHS, No. 2, A. Abad //	02.06.1954	Abbottabad	18.01.1984	23.10.1987	23.10.1987	SS on 10.7
12	30	Mr. Hamidullah Shah, SET, GHSS, T. Nasrati, Karak //	01.03.1950	Karak	01.03.1978	29.10.1987	29.10.1987	
13	31	Mr. Ali Akbar, SET, GHS, Khar Bajaur Agency //	02.02.1953	Mardan	19.10.1977	18.02.1981	03.11.1987	Died on 4.11
14	32	Mr. Muhammad Riaz, SET, GHS, Kuladhead Umerzai //	16.03.1953	Charsadda	29.11.1975	16.10.1987	15.12.1987	
15	33	Mr. Fazil Dayer, SET, GHS, Khair Abad, Mardan //	15.11.1950	Mardan	15.11.1973	15.12.1987	15.12.1987	Died on 22.12
16	34	Mr. Muhammad Hifzur Rehman, SET, GHS, Peshawar //	03.10.1951	Charsadda	26.11.1975	16.12.1987	16.12.1987	
17	35	Mr. Abdul Latif, SET, GHS, Zaida Swabi //	05.09.1951	Swabi	18.10.1982	17.12.1987	17.12.1987	
18	X 35	Mr. Jaleelud Din SET, GHS, Miran shah, NWA //	20.06.1949	Karak	01.01.1978	31.03.1984	09.02.1985	
19	37	Mr. Asmatullah, SET, GHSS, Kataya, Ork Agency //	30.10.1948	Karak	01.07.1978	31.05.1984	09.02.1985	
20	38	Mr. Zabarjast Khan, SET, GHS, Takhti Nasrati, FK //	03.03.1951	Karak	14.03.1970	02.02.1985	09.02.1985	
21	39	Mr. Jehan Zeb SET, GHS, Habibullah, FR Bannu //	15.01.1951	FR Bannu	01.07.1978	24.04.1985	09.02.1985	
22	X 40	Mr. Sarwar Shah, SET, GHS, Dab Kor Moh. Agency //	03.10.1941	Peshawar	24.01.1979	27.10.1985	09.02.1985	
23	X 41	Mr. Rahim Gul SET, GHS, Moh. Khan Kila Khy. Agy. //	20.07.1949	Khy. Agency	18.05.1971	27.05.1986	09.02.1985	
24	X 42	Mr. Noorud Din, SET, GHS, Habibullah, FR Bannu //	14.07.1947	Karak	01.02.1978	27.05.1986	09.02.1985	
25	X 43	Mr. Sultan Muhammad, SET, GHS, Moh. Khan Kila //	01.04.1942	Dir	02.03.1978	13.06.1987	09.02.1985	
26	X 44	Mr. Majidullah, SET, GHS, Dab Kor //	14.11.1946	Charsadda	18.05.1978	13.06.1987	09.02.1985	
27	X 45	Mr. Muhammad Qaim, SET, GHSS, Balkhela, MKD //	09.12.1973	Malakand	09.12.1973	09.12.1975	09.02.1985	
28	X 43	Mr. Abdur Rahim, SET, GHS, Khar Bajaur Agency //	15.02.1950	Charsadda	30.10.1976	01.04.1978	09.02.1985	
29	X 46-A	Mr. Mir Bad Shah SET (ATA) (P-8)	12-3-1956	Peshawar	-	26-1-1977	09-2-1985	
30	46-B	Mr. Hakeem Khan SET (ATA) //	15-5-1951	Peshawar	-	1-5-1978	09-2-1985	

Page - 8
of appeal.

								Date of DD - Approval SE
31	47	Mr. Mushiaf Ahmad, SET, GECIM, Jamrud, Khy. Agy	19.03.1949	Mardan	28.03.1963	26.06.1978	09.02.1988	
32	48	Mr. Hsarkhan, SET, GHS, Shamshatze, FR Pesh	03.12.1956	FR Peshawar	22.12.1978	22.12.1978	09.02.1988	
33	49	Mr. Sher Zaman SET, GHS, No. 1, Kulachi	01.08.1950	D.I. Khan	22.01.1978	13.06.1979	09.02.1988	
34	50	Mr. Muhammad Hassan, SET, GHS Zoran, Khy. Agy:	15.03.1961	Khy. Agy	15.03.1982	15.03.1982	09.02.1988	
35	51	Mr. Ihsenullah SET, GHS, No. 2, D.I. Khan	15.03.1962	D.I. Khan	19.12.1982	19.12.1982	09.02.1988	
36	52	Mr. Amir Azam SET, GHS, No. 1, Mansehra	16.03.1955	Mansehra	11.03.1978	13.05.1983	09.02.1988	
37	53	Mr. Qayum Nawaz SET, GHS, Kuljai D.I. Khan	30.11.1962	D.I. Khan	08.03.1982	30.11.1983	09.02.1988	
38	54	Mr. Fazli Manan, SET, GHS, T. Ehai Mardan	12.01.1954	Mardan	06.01.1979	23.01.1984	09.02.1988 ✓	
39	55	Mr. Muhammad Javed, SET, GHSS, Balfa, Mansehra	20.04.1961	Mansehra	12.02.1983	11.03.1985	09.02.1988 ✓	
40	56	Mr. Muhammad Sulman, SET, GHSS, No. 2 Mingora	01.03.1959	Swat	01.07.1986	01.07.1986	09.02.1988 ✓	
41	57	Mr. Muhammad Salim, SET GHS, Ayure Chitral / ^{Bathkhal} _{Mahakand}	01.09.1963	Chitral	21.03.1983	22.01.1988	09.02.1988 ✓	
42	58	Mr. Muhammad Sadiq, SET, GHS, Wanda Jali D.I. Khan	20.03.1959	D.I. Khan	30.03.1981	30.03.1981	09.02.1988 ✓	
43	59	Mr. Ghulam Faridud Din, SET, GHS, Wandala, D.I.K	15.11.1958	D.I. Khan	12.03.1982	12.03.1982	09.02.1988 ✓	
44	60	Mr. Abdul Majid, SET, GHS, No. 2, D.I. Khan	03.01.1965	D.I. Khan	01.07.1978	09.02.1986	09.02.1988 ✓	
45	61	Mr. Fazal Maula, SET, Muhammad Khan Kili	03.01.1942	Charsadda	17.03.1978	05.12.1987	09.02.1988 ✓	
46	62	Mr. Ajmal Shah, SET, GHSS, Piprai Nowshera	01.04.1945	Charsadda	41.01.1971	11.03.1988	11.03.1988 ✓	
47	63	Mr. Muhammad Ayub SET, GHS, Paniala D.I.K	20.10.1963	D.I. Khan	15.12.1985	29.03.1988	29.03.1988 ✓	
48	64	Mr. Tanash Khan, SET, GHS, Dab Kor Moh: Agy:	03.06.1939	Bannu	28.01.1967	01.06.1978	25.05.1988 ✓	
49	65	Mr. Yousaf Ali, SET, GHS, Timergara Dir	25.03.1958	Dir	21.03.1982	20.11.1983	07.09.1988 ✓	
50	66	Mr. Muhammad Fayyaz SET, GHSS, Gulbatar Pesh	16.03.1963	Charsadda	18.02.1978	01.12.1988	18.01.1989 ✓	
51	67	Mr. Shah Nawaz, SET, GHS, Aizai, K. Agency	09.03.1952	Karak	05.01.1971	01.02.1978	18.01.1989 ✓	
52	68	Mr. Iqbal Ahmad, SET, GHS, Kohat	05.09.1959	Kohat	20.04.1982	02.04.1982	29.01.1989 ✓	
53	69	Mr. Zulfikar Ali, SET, GHSS, Mansehra.	17.10.1957	Mansehra	09.03.1979	01.10.1983	04.02.1989 ✓	
54	70	Mr. Sabz Ali SET, GHS Milna Jhel Karak	01.10.1947	Karak	03.03.1984	09.02.1988	04.02.1989 ✓	
55	71	Mr. Salahud Din, SET, GHS, Dab Kor Moh: Agy:	01.01.1948	Charsadda	18.05.1968	26.06.1978	04.02.1989 ✓	

								Date of approval
56	72	Mr. Badiuz Zaman SET, GHSS, No.2. DIK	01.04.1982	Dikhan	11.04.1981	26.05.1989	04.02.1989 ✓	P-11
	① 73	Mr. Nasir Hussain, SET, GMS, Zairan, Kurram (P-II)	15.02.1959	Kurram	07.01.1979	01.04.1987	06.02.1989 ✓	
	2/74	Mr. Sajjad Ahmad, SET, GHSS, Baffa Marsehra (P-II)	15.06.1963	Mansohra	11.11.1982	19.10.1989	19.10.1989 ✓	
	3	75 Mr. Muhammad Khalid, SET, GHS, Havelian, A. Abad ✓	01.06.1963	Abbottabad	26.12.1987	19.10.1989	19.10.1989 ✓	
	4	75 Mr. Hafizur Rehman SET, GHS, Swabi	30.03.1963	Mardan	12.12.1989	12.12.1989	12.12.1989 ✓	19/6/98
		77 Mr. Rashid Ahmad, SET, GHS Toghala Kohat	29.11.1960	Kohat	04.02.1987	21.10.1990	21.10.1990 ✓	
X	⑤ 73	Mr. Attaullah Jan, SET, GHS, Fawa A/Abad	01.04.1958	Mansohra	21.11.1981	15.12.1990	15.12.1990 ✓	
	79	Mr. Didar Hussain, SET, GHS Zeran, K. Agency	12.01.1961	K. Agency	09.02.1982	15.12.1990	15.12.1990 ✓	
	80	Mr. Zakirullah SET, GHS, Swabi	02.01.1964	Mardan	27.12.1990	27.12.1990	27.12.1990	
	81	Mr. Mumtaz Pervez, SET, GHS Shabaz Garhi Mardan	14.03.1960	Mardan	04.11.1981	29.12.1990	30.12.1990	
	82	Mr. Israj Khan, SET, GHS Marghuz Swabi	30.11.1959	Mardan	14.03.1979	17.01.1991	17.01.1991	
	83	Mr. Atlas Khan SET, GHS, Dara Zinda FR DIK	05.12.1964	FR DIK	10.12.1985	19.08.1985	19.08.1991	
	84	Mr. Muhammad Younis SET, GHS No.2 Bannu	25.11.1946	Bannu	02.11.1972	04.11.1978	16.10.1991	
	85	Mr. S. Keramat Hussain, SET, GHS,	10.01.1957		26.03.1980	26.03.1980	16.10.1991	
	85	Mr. S. Shabir Hussain Shah, SET, GHS, Afzal	30.01.1961	K. Agency	28.10.1980	28.10.1980	16.10.1991	
	87	Mr. Noor Elahi, SET, GHS,	06.01.1962		27.03.1981	27.05.1981	16.10.1991	
	88	Mr. Hussain Khan, SET, GHS, Paanediva, K. Agency	01.04.1961	Kurram	16.11.1980	16.11.1980	16.10.1991	
X	89	Mr. Muhammad Afzal, SET, GHS No.1 Haripur	10.04.1948	Haripur	01.11.1973	26.10.1981	16.10.1991	
	90	Mr. Farhad Islam, SET, GHS, Subhan Khawar, K. Agency	01.01.1960	Kurram	09.03.1983	09.03.1983	16.10.1991	
	91	Mr. Imran Ali SET, GHS, Kirman	01.04.1959	Kurram	08.03.1983	08.03.1983	16.10.1991	
	92	Mr. Khalid Mehmood, SET, GHSS, T.T. Shiq Haripur	15.07.1962	Haripur	08.11.1982	01.10.1983	16.10.1991	
	93	Mr. Rehmatullah Khan SET, GHS, Daraban Kalar, DIK	03.01.1959	Dikhan	25.10.1982	30.04.1984	16.10.1991	
	94	Mr. Muhammad Zaman SET, GHS, Habibullah Khan	12.07.1958	Bannu	28.11.1981	05.03.1984	16.10.1991	
	95	Mr. Fazlullah, SET, GHS, Sherpac Charsadda	26.12.1964	Charsadda	08.01.1985	08.04.1985	16.10.1991	
	96	Mr. Muhammad Iqbal, SET, GHSS, Shabaz Garhi Mdn	11.09.1957	Mardan	25.01.1985	25.04.1985	16.10.1991	

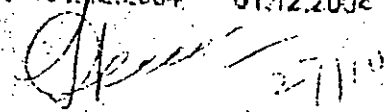
97	Mr. Tabasum Mehmood, SET, GHS, No. 2, Kohat	15.05.1958	Kohat	09.01.1986	09.01.1986	16.10.1991
93	Mr. Jan Muhammad, SET, GHS, Timargara Dir	05.12.1963	Dir	05.06.1986	05.06.1986	16.10.1991
X 93	Mr. Muhammad Zahir Shah, SET, GHS, Totakan M. Agy	01.04.1948	M. Agency	01.07.1986	01.07.1986	16.10.1991
100	Mr. Jehanzeb, SET, GHS, Subhan khawar, M. Agy	15.05.1958	M. Agency	02.07.1986	02.07.1986	16.10.1991
101	Mr. Murad ALI, SET, GHS, Alizai Lower K. Agency	03.04.1964	FR Bannu	21.06.1986	01.10.1986	16.10.1991
102	Mr. Ayaz Khan, SET, GHS, Kohat	02.03.1964	Kohat	30.10.1986	30.10.1986	16.10.1991
103	Mr. Muhammad Hassen SET, GHS, Miran shah, NWVA	16.05.1959	NWVA	06.04.1982	04.11.1982	16.10.1991
104	Mr. Daud Khan, SET, GHS, Timargara, Dir	09.10.1983	Dir	09.09.1982	01.11.1987	16.10.1991
105	Mr. Sabir Khan, SET, GHSS, Mingora Swat	01.01.1961	Swat	01.03.1983	01.11.1987	16.10.1991
106	Mr. Muhammad Tariq, SET, GHS, Medyan, Swat	02.02.1962	Swat	01.11.1987	01.11.1987	16.10.1991
107	Mr. Muhammad Salim, SET, GHS, No. 1, Mingora swat	06.05.1960	Swat	16.05.1982	28.10.1987	16.10.1991
X 108	Mr. Niaz Muhammad Khan SET, GHS, Wadudia swat	11.07.1950	Swat	17.04.1984	12.12.1987	16.10.1991
109	Mr. Muhammad Amin, SET, GHS, S/Sharif, swat	12.05.1966	Swat	27.08.1989	27.08.1989	16.10.1991
110	Mr. Salehud Din, SET, GHS, S/Sharif swat	09.05.1959	Swat	05.12.1986	16.03.1989	16.10.1991
111	Mr. Ibad ulah, SET, GHSS, No. 4, Kakshal Peshawar	01.04.1963	Peshawar	23.09.1989	16.10.1989	16.10.1991
112	Mr. Attaullah Khan SET, GHS, Timargara Dir	25.10.1954	Dir	06.12.1988	01.04.1990	16.10.1991
113	Mr. Naqibullah SET, GECOMM, Al NWVA	12.04.1963	FR Bannu	15.04.1984	16.10.1990	16.10.1991
114	Mr. Abdul Shafiq SET, GHS, Miranshan, NWVA	22.11.1952	NWVA	19.11.1975	11.10.1990	16.10.1991
115	Mr. Zainullah Sr. Instructor, GATTC, Peshawar.					16.10.1991
116	Mr. Afsar Jehan, SET, GHS, No. 1, Nowshera cantt		Nowshera			04.10.2003
117	Mr. S Alam zaib badshah, SET, GHSS, Kizir abad Mdn		Mardan			04.10.2003
118	Mr. Darvesh Khan, SET, GCHHS, Marghaa swabi		Peshawar			04.10.2003
119	Mr. Ishfaq Rasool, SET, GHSS, Swabi		Peshawar			04.12.2003
120	Mr. Amir Hussain, SET, GHS, Barawal bandi Dir U		Dir Upper			04.12.2003
121	Mr. Nuzaffar Khan, SET, GHS, Ayun Chitral		Swabi			04.10.2003

122 Mr. Hamoedul Haq, SET, CHS, Barawal Bandi Dir U
 123 Mr. Muhammad Sahib Khan SET, GCHMS, Tank
 124 Mr. Maqbool Ahmad, SET, GHS, Kayala Ork, Agy.
 125 Mr. Zahid ulah Khan SET, GHS, Kanigurram SYVA
 126 Mr. Bahadur Nawaz, SET, GHS, Ayune Chitral
 127 Mr. Rasheed Ahmad, SET, GHS, Ghazi Haripur
 128 Mr. Nasser Khan SET, GHS, Sherwan A. Abed
 129 Mr. S. Zafar Ali Shah, SET, GHS, Parwa A. Abed
 130 Mr. Pir Hussain Shah, SET, GHS, Chitral
 131 Mr. Nasseeb Zada, SET, GHS, Chitral
 132 Mr. Sahib Zada, SET, GHSS, Jamirad

Djr Upper
 Kohat
 Karak
 Bannu
 Karak
 Haripur
 Haripur
 Haripur
 Mansehra
 Haripur

04.10.2003
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 04.10.2003
 01.12.2004

15.12.1962 FR Peshawa 01.12.2004 01.12.2004



DEPUTY DIRECTOR (ESTABLISHMENT)
 SCHOOLS & LITERACY, NWFP, PESHAWAR.

SHAH

310.	1731	Azra Yasmin	12.7.20	SET	GGMS, Peshawar
317.	1732	Nyssa	12.7.20	SET	GGMS, Peshawar
318.	1733	Munira Naz	12.7.20	SET	GGMS, Peshawar
319.	1734	Chazala Shabnam	12.7.20	SET	GGMS, Peshawar
320.	1735	Rafia	12.7.20	SET	GGMS, Peshawar
321.	1737	Sajida Nuzhat	12.7.20	SET	GGMS, Peshawar
322.	1738	Farhat Amir	12.7.20	SET	GGMS, Peshawar
323.	1740	Fatma Naz	12.7.20	SET	GGMS, Peshawar
324.	1741	Salma Begum	12.7.20	SET	GGMS, Peshawar
325.	1742	Nighat Seema	12.7.20	SET	GGMS, Peshawar
326.	1743	Fayal Begum	12.7.20	SET	GGMS, Peshawar
327.	1744	Naila Perveen	12.7.20	SET	GGMS, Peshawar
328.	1745	Shamila Naz	12.7.20	SET	GGMS, Peshawar
329.	1746	Amna Begum	12.7.20	SET	GGMS, Peshawar
330.	1748	Naila Perveen	12.7.20	SET	GGMS, Peshawar
331.	1749	Razia Taj	12.7.20	SET	GGMS, Peshawar
332.	1751	Yasmin Bibi	12.7.20	SET	GGMS, Peshawar
333.	1753	Nasim Akhtar	12.7.20	SET	GGMS, Peshawar
334.	1754	Ganjan Yousof	12.7.20	SET	GGMS, Peshawar
335.	1755	Sul Pari	12.7.20	SET	GGMS, Peshawar
336.	1757	Nabila Naz	12.7.20	SET	GGMS, Peshawar
337.	1758	Lubna Begum	12.7.20	SET	GGMS, Peshawar
338.	1760	Hyeda Rozina Kausar	12.7.20	SET	GGMS, Peshawar
339.	1765	Amina Waseer	12.7.20	SET	GGMS, Peshawar
340.	1767	Khalida Jan	12.7.20	SET	GGMS, Peshawar
341.	1772	Wahida Khan	12.7.20	SET	GGMS, Peshawar
342.	1774	Zahida Bibi	12.7.20	SET	GGMS, Peshawar
343.	1778	Anita Zameer	12.7.20	SET	GGMS, Peshawar
344.	1780	Noor Nabila	12.7.20	SET	GGMS, Peshawar
345.	1781	Farhat Amir	12.7.20	SET	GGMS, Peshawar
346.	1782(A)	Nasheema Amir	12.7.20	SET	GGMS, Peshawar
347.	1782(B)	Nur Jabeen	12.7.20	SET	GGMS, Peshawar

1 MALE SET (TECH)

S.No	Seniority List No.	Name of Officer	Date of Appointment	Present Place of Posting
1	1750	Munir Khan	17.7.20	SET (TECH) GGMS, Lalambar, Karakoram

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
ESTABLISHMENT & SECONDARY EDUCATION DEPARTMENT

Endst. of even no. & date:
Copy is forwarded to:

- Secretary to Govt. of Khyber Pakhtunkhwa Peshawar.
- Special Secretary (Regulation), Establishment Department, Govt. of Khyber Pakhtunkhwa Peshawar.
- Secretary to Govt. of Khyber Pakhtunkhwa Peshawar.
- Secretary to Chief Minister Khyber Pakhtunkhwa.
- PS to Chief Secretary Khyber Pakhtunkhwa.

True Copy
Jm

AMC/2020
TO THE GOVT.
SECRETARY

90-648

15A

~~15A~~

31	1731	Azra Yasmia	12.7.99	SET GGMS Pishtakhara Payan Pesh:
317	1732	Riyasat	12.7.99	SET GGHS Pana Swat
318	1733	Sumaira Naz	12.7.99	SET GGMS Zoormandi Kheroshah Malakand
319	1734	Ghazala Shabnam	12.7.99	SET GGHS Lund Khwar Mardan
320	1735	Ruqia	12.7.99	SET GGHS Tour Dheri Swabi
321	1737	Sajida Nuzhat	12.7.99	SET GGHS Mingora Swat
322	1738	Nizakat Ambar	12.7.99	SET ADO Swat
323	1740	Falak Naz	12.7.99	SET GGHS Shahbaz Ghar Mardan
324	1741	Salma Begum	12.7.99	SET GGHS Shaheen Camp Peshawar
325	1742	Nighat Seema	12.7.99	SET GHS Fata Directorate
326	1743	Hayat Begum	12.7.99	SET GGHS Odigram Swat
327	1744	Naila Parveen	12.7.99	SET GGHS Matta Swat
328	1745	Shakila Naz	12.7.99	SET GGHS Skhakot Malakand
329	1746	Almas Begum	12.7.99	SET GGHS Charbagh Swat
330	1748	Naila Parveen	12.7.99	SET GGHS Bara Durash Khel Swat
331	1749	Razia Taj	12.7.99	SET GGHS Hathian Mardan
332	1751	Yasmin Bibi	12.7.99	SET GGHS Miana Malakand
333	1753	Nasim Akhtar	12.7.99	SET GGMS Surok Toor Chaopar Fata
334	1754	Samina Yousaf	12.7.99	SET GGHS Suban Khawar Moh: Agy
335	1755	Gul Pari	12.7.99	SET GGMS Wali Khel Fata
336	1757	Nabila Naz	12.7.99	SET GGHS Karigar Ghari Kh: Agy
337	1758	Lubna Begum	12.7.99	SET GGMS Haryana Bala Pesh:
338	1760	Syeda Rozina Kauser	12.7.99	SET GGHS Landi Arbab Pesh:
339	1765	Amina Wazeer	12.7.99	SET GGMS Jamu Shah Khel FR Kohat
340	1767	Khalida Jan	12.7.99	SET AAEO Mohd Agency
341	1772	Wahida Khan	12.7.99	SET AAEO Khyber Jamrud
342	1774	Shahida Bibi	12.7.99	SET GGMS Kohi Baham FR DIK
343	1776	Anila Zaheer	12.7.99	SET GGMS SRD M.Agy
344	1780	Noor Rabia	12.7.99	SET GGHS Subhan Khwar Moh: Agy
345	1781	Farhat Amir	12.7.99	SET GGMS Baz Mohd. Kor M.Agy
346	1782(A)	Nosheena Aziz	12.7.99	SET GGHS Chamkani Pesh:
347	1782(B)	Nur Jabeen	12.7.99	SET GGMS Sragala Kurram Agency FATA

1 MALE SET (TECH)

S.No	Seniority List No.	Name of Officer	Date of Appointment as Regular SET	Present Place of Posting
1	115 C	Mumtaz Khan	17-12-1992	SET (TECH) GHS Latamber Karak

SECRETARY TO GOVT OF KHYBER
 PAKHTUNKHWA
 ELEMENTARY & SECONDARY
 EDUCATION DEPARTMENT

Endst; of even no. & date.

- 1) Secretary to Govt. of Khyber Pakhtunkhwa Establishment Department, Peshawar.
- 2) Special Secretary (Regulation), Establishment Department, Govt. of Khyber Pakhtunkhwa, Peshawar.
- 3) Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department, Peshawar.
- 4) Secretary to Chief Minister Khyber Pakhtunkhwa.
- 5) PS to Chief Secretary Khyber Pakhtunkhwa.

16

"Anx:G"



The Secretary Education
Khyberpaktunkhwa,
Peshawar.

To
Subject: AWARD OF SELECTION GRADE
Through proper channel

R/Sir

With due respect I beg to submit that I am working in education department against

SST Technical Post w.e.f 01-11-1986

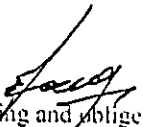
I have been awarded graded pay from 17/12/1992 and was regularise on the post of SST
(Technical).

It is further stated for your kind information that my colleagues who were appointed later
in 1987 were awarded selection grade from the date of appointment while I have been
deprived from this right.(S/Grade)

Hence It is requested in your kind honor that I may kindly be treated as my
colleagues and selection grade may be awarded from date of award of graded pay 17/12/1992.

I shall be thankful to you for this act of kindness


Documents attached:
1)1st appointment order
2)Award of graded pay
3)Colleagues selection grade

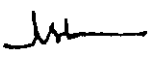

Thanking and obliging

Yours
Mumtaz Khan S.E.T
GHS Tattar khel
Karak(KPK)

Endst: 728 Dt. 12-4-2014

Forwarded in original
to the DEO (Exst) Karak
for n/a and onward submission pl.


Head Master
G.H.S Tattar Khe.
(Karak)

True Copy


BEFORE THE HONORABLE KHYBER PAKHATUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No: 1058/2014

Mumtaz Khan SST GHS Tatar Khel District Karak

.....Appellant

VERSUS

Secretary E&SE Department, Khyber Pakhtunkhwa & others.

.....Respondents

PARAWISE COMMENTS ON & FOR BEHALF OF RESPONDENTS 1-4.

Respectfully Sheweth :-

The Respondents submit as under:-

PRELIMINARY OBJECTIONS.

- 1 That the Appellant has got no cause of action/ locus standai.
- 2 That the instant Service Appeal is badly time barred.
- 3 That the Appellant has concealed material facts from this Honorable Tribunal in the instant service appeal.
- 4 That the instant service appeal is based on malafide intentions just to put extra pressure on the Respondents for gaining illegal service benefits.
- 5 That the Appellant has not come to this Honorable Tribunal with clean hands.
- 6 That the Appellant is not entitled for the relief he has sought from this Honorable Tribunal.
- 7 That the instant Service Appeal is against the prevailing law & rules.
- 8 That the Appellant has been treated as per law, rules & Policy.
- 9 That the instant appeal is not maintainable in its present form.
- 10 That the appeal is bad for mis-joinder & non-joinder of the necessary parties.
- 11 That the instant Service Appeal is barred by law.
- 12 That the Appellant is not competent to file the instant appeal against the Respondents.
- 13 That the impugned Notification dated 16-2-2000 is legally competent.
- 14 That the scheme of grant of Selection Grade has been discontinued vide Notification dated 27-10-2001 by the Finance Department Govt: of Khyber Pakhtunkhwa.

ON FACTS.

- 1 That Para-I is incorrect & misleading on the grounds that the appellant has been granted graded pay vide office order dated May, 1998 in compliance of the judgment dated 23-9-1996 against the post of Workshop Instructor (WI) on the basis of his result declaration of his MA(Technical Education) whereas rest of para relates to the service period of the appellant, hence needs no comments. (copy of the said order attached as Annexure-A).

- 42
- 2 That Para-2 is incorrect & denied. The scheme of the grant of selection grade has been discontinued by the Finance Department Govt: Of Khyber Pakhtunkhwa, vide Notification No: FD(PRC) 1-1/2001 dated 27-10-2001, hence in terms of the above said Notification, the appellant is not entitled for the grant of selection grade against the above mentioned post (copy of the said Notification as Annexure-B).
 - 3 That Para-3 is also incorrect & denied on the grounds that the scheme of the grant of selection grade has been discontinued vide the above said Notification attached as Annexure-B.
 - 4 That Para-4 is incorrect & misleading. The appellant does not fall within the ambit & batch with those civil servants who have been allowed selection grade vide Notification dated 16-01-2008 by the Respondent Department.
 - 5 That Para-5 is also incorrect & denied. The date of the service regularization of the appellant is May, 1998, whereas the referred Notification dated 16-01-2008 is upto the batch of 1989, hence the appellant has been made not entitled for the grant of selection grade neither he can be treated at par with the those officials who have been granted / allowed selection grade in terms of the Notification dated 27-10-2011 issued by the Finance Department.
 - 6 That Para-6 is also incorrect & misleading. The appellant has not filed any departmental appeal for the grant of selection grade against the above mentioned post of SET/ SST in the light of above made submissions, however the Respondents further submits on the following grounds inter alia:-

ON GROUNDS.

- A Incorrect not admitted. The Respondents have acted as per law , rules & procedure and have not violated any kind of fundamental rights of the appellant in the instant case. Hence this ground is also liable to be rejected in the light of the Notification dated 27-10-2001 of the Finance Department in favour of the Respondents.
- B Incorrect & not admitted. The appellant is not entitled for the grant of selection grade in terms of the above referred Notification, nor he has been discriminated in the instant case by the Respondents.
- C Incorrect & denied. The statement of the appellant is without any cogent reason & proof in this ground, hence is liable to be dismissed.
- D Incorrect & denied. The scheme of selection grade has been discontinued by the Govt: of Khyber Pakhtunkhwa, vide Notification No: FD(PRC) 1-1/ 2001 dated 27-10-2001 issued by the Govt: of Khyber Pakhtunkhwa, Finance Department. Hence the appellant is not entitled for the grant of the selection grade against the above mentioned post in the given circumstances .

Incorrect & denied. Legal, however the Respondents seek leave of this Honorable Service Tribunal to submit additional grounds & record in the time of arguments.

In view of the above made submissions, it is requested that this Honorable Tribunal may very graciously be pleased to dismiss the instant service appeal with cost in favour of the Respondent Department.

13/1/2016
Director
E&SE Khyber Pakhtunkhwa,
Peshawar.
(Respondents No:3&4)

Secretary
E&SE Khyber Pakhtunkhwa,
Peshawar.
(Respondent No: 1&2)

AFFIDAVIT

I, Kh. Rehman, Asstt: Director (Litigation-II) E&SE Department KPK Peshawar do hereby solemnly affirm and declare on oath that the contents of the instant Parawise Comments are true & correct to the best of my knowledge & belief.

Depoent

Amx: A

21

8

DIRECTOR OF THE DIRECTOR OF SECONDARY EDUCATION, NWFP, PESHAWAR.

S. I. KHAN

Consequent upon the decision of NWFP Service Tribunal, announced on 27-9-1996, Mr: Mustaz Khan, W.I, Govt; High School, NO: I, Mangra (Kohat), is hereby allowed granted pay scale in E-16 with effect from the date of his declaration as NA (Technical Education) Examination results.

(SYED ABU SAJJAD BACHA)
DIRECTOR OF SECONDARY EDUCATION,
NWFP, PESHAWAR.

Encl: NO: 232/2-32/2-14/G. Pay/DIR/101; 3/95 Dated Pesh; the 2/5/1997.

Copy forwarded to the:-

1. Divl. Director of Education (C) Kohat. Division Kohat.
2. District Education Officer (M) Secondary, Kohat.
3. District Accounts Officer, ~~Division~~ Kohat.
4. Headmaster, Govt; High School, NO: I, Mangra.
5. Teachers concerned.

Aziz
DEPUTY DIRECTOR SECONDARY,
EDUCATION, NWFP, PESHAWAR.

ASSISTANT DIRECTOR

True Copy

[Signature]

OFFICE OF THE DIRECTOR SECONDARY EDUCATION, NWFP,
PESHAWAR

ORDER PAY:

Consequent upon the decision of NWFP, Services Tribunal, announced on 23.09.1996, Mr. Mumtaz Khan, W.I. Govt: High School No.I, Hangu (Kohat), is hereby allowed graded pay scale in B-16 with effect from the date of declaration MA(Technical Education) Examination results.

Sd/-
(Syed Abu Sajid Bacha)
Director Secondary Education,
Peshawar

Endst No.322630/B-14/G-Pay/Set/Vol:3/95 Dated Pesh; the 05.05.1998.

Copy forwarded to the:-

1. Divl: Director of Education () Kohat, Division Kohat.
2. District Education Officer (M) Secondary, Kohat.
3. District Accounts Officer, Kohat.
4. Headmaster, Govt: High School, No.I, Hangu.
5. Teachers conned.

Sd/-
Deputy Director Secondary
Education, NWFP, Peshawar

ANNA

GOVERNMENT OF N.W.F.P.
FINANCE DEPARTMENT

No. FD(PRC)1-1/2001
Dated Peshawar the, October 27, 2001.

From:-

The Secretary to Government of NWFP,
Finance Department.

To

1. All Administrative Secretaries to Government of NWFP.
2. The Senior Member Board of Revenue, NWFP.
3. The Secretary to Governor NWFP, Peshawar.
4. The Secretary, Provincial Assembly, NWFP.
5. All Heads of Attached Departments NWFP.
6. All District Coordination Officers/Political Agents/ District and Sessions Judges NWFP.
7. The Registrar, Peshawar High Court, Peshawar.
8. The Chairman, NWFP, Public Service Commission.
9. The Chairman, NWFP, Service Tribunal, Peshawar.
10. The Secretary Board of Revenue, NWFP, Peshawar.

Subject:-

REVISION OF BASIC PAY SCALES AND FRINGE BENEFITS OF CIVIL EMPLOYEES (BPS 1 – 22) OF THE N.W.F.P. GOVERNMENT (2001).

Sir,

I am directed to state that the Governor of the NWFP has been pleased to sanction, with effect from December 1, 2001, a scheme of the Basic Pay Scales, Allowances and Pensions, 2001 for the Civil employees of the Government of NWFP in BPS 1 to BPS 22 as detailed below:-

PART I – BASIC PAY SCALES AND ALLIED MATTERS.

2. BASIC PAY SCALES :- The existing Basic Pay Scales and the revised Basic Pay Scales are shown in Annexure-I to this letter. The revised basic pay scales shall

replace the existing Basic Pay Scales, 1994, and shall be effective from 1st December, 2001.

3. DISCONTINUATION OF ALLOWANCES :- The following allowances shall cease to be payable on introduction of the revised pay scales with effect from 01-12-2001:-

- i. Cost of Living Allowance to BPS 1 to BPS 22 @ 7% of basic pay.
- ii. Adhoc relief of Rs. 300/-p.m. and Rs. 100/- p.m. to BPS 1 to BPS 16 (inclusive of BPS-17 by virtue of Move Over).
- iii. Secretariat Allowance/Personal Allowance if any/Adhoc Relief as recompense for Secretariat/Personal Allowance.

4. SPECIAL ADDITIONAL ALLOWANCE :- Special Additional Allowance sanctioned vide Finance Department's letter No. FD(PRC)1-1/99 dated 26-7-1999 shall be frozen at the level drawn as on date of issue of this letter.

5. INITIAL FIXATION OF PAY :- Pay of the employees in Government service on 30-11-2001 shall be fixed at the stage in the revised pay scales which is as many stages above the minimum as the stage occupied by him above the minimum of the 1994 Basic Pay Scale.

6. PAY FIXATION ON PROMOTION :- The existing provisions regulating the fixation of pay in case of promotion from lower to a higher post shall continue to apply.

7. SELECTION GRADE AND MOVE OVER :- selection Grade in the scheme of Basic Pay Scales and Move Over scheme shall stand discontinued w.e.f the date of issue of this letter.

8.

PAY FIXATION OF EMPLOYEES IN SELECTION GRADE AND THOSE WHO HAVE MOVED OVER TO HIGHER SCALE.

Pay of an existing employee drawing pay by move over shall be fixed with reference to the pay scale of the post for the time being held by him. In case the employee was drawing pay in Selection Grade, his pay will be fixed in the Selection Grade pay scale. The stage of fixation will be arrived at after allowing increments on notional basis in the original scale of the post or the Selection Grade, in 1994 Basic Pay Scales, upto the point of existing pay. Pay of the employees will then be fixed at the relevant stage in the revised pay scales 2001.

EXAMPLE I

Assistant, BPS-11 Selection Grade, BPS 15, Move over BPS 16 and in receipt of Pay of Rs. 5490/- Pay will be fixed in BPS-15 i.e. Selection Grade pay scale at Rs. 8320/- as under :-

	Stage 15	Stage 16	Stage 17	Stage 18	Stage 19
1994 Scale	4845	5022	5199	5376	5553
2001 Scale	7260	7525	7790	8055	8320

EXAMPLE II

Pay fixation of an employee in BPS-11 who has moved over to BPS-14 and is in receipt of basic pay of Rs. 4480/- will be fixed after allowing notional increments in BPS-11 of 1994 Basic Pay Scales upto the stage of basic pay drawn. Pay in revised BPS-11 will be fixed at the corresponding stage of Rs. 6790/- as under:-

BPS-11	Stage 15	Stage 16	Stage 17	Stage 18	Stage 19	Stage 20	Stage 21	Stage 22	Stage 23	Stage 24
1994 Pay Scale	3465	3581	3697	3813	3929	4045	4164	4277	4393	4509
2001 Pay Scale	5215	5390	5565	5740	5915	6090	6265	6440	6615	6790

EXAMPLE-III

Pay Fixation of an employee in BPS-5 who has moved over to BPS-11 and is in receipt of basic pay of Rs. 3465/- will be fixed after allowing notional increments in BPS-5 of 1994 BPS upto the stage of basic pay drawn. Since basic pay of Rs. 3465/- is beyond the 30 stages in notional BPS-5, (1994 BPS), and resultantly more than the 30 stages of BPS-2001, therefore, his pay will be fixed at the notional 32nd stage i.e. at Rs.5300/-. The difference of Rs. 200/- (Rs.5300 - 5100) will be personal to him as under:-

	Stage- 30	Stage - 31	Stage - 32
BPS-5 1994	3380	3446	3512
BPS-5 2001	5100	5200	5300

In such cases future increments upto a maximum of 3 years will also be allowed as personal to such employees:

9. DATE OF INCREMENT:- Annual increment shall continue to be admissible subject to the existing conditions, on the 1st December each year.

10. SPECIAL PAYS/ALLOWANCES FOR OFFICES :- The Special Pays/ Allowances sanctioned to offices as percentage of pay shall be discontinued on the introduction of revised pay scales w.e.f 1-12-2001 and adjusted in future increments.

11. ADVANCE INCREMENTS :- The existing scheme of advance increments is discontinued w.e.f. 1-12-2001. A fresh scheme, if any, will be introduced in due course.

PART II ALLOWANCES.

12. Conveyance Allowance :- The rates of existing Conveyance Allowance and Motorcycle/Motorcar maintenance allowance presently fixed with reference to pay drawn shall be increased and related to Basic Pay Scales as follows:-

S.No.	EXISTING	REVISED
i.	Government servants drawing pay in BPS-16 (Gazetted) and above and maintaining motorcar not registered for commercial purpose. Rs.355/-P.M.	BPS-16 (Gazetted) and above Rs.620/-P.M.
ii.	Government servants drawing pay of Rs. 3240/- per month and above other than those at (i) above Rs.193/- P.M.	BPS-11 and above Rs.340/- P.M.
iii.	Government servants drawing pay of Rs.1688/- per month and above but less than Rs. 3240/- P.M. and maintaining Motorcycle/Scooter. Rs.130/- P.M.	BPS 1 - 10 maintaining Motorcycle/Scooter Rs.230/- P.M.
iv.	Others Rs.96/- P.M.	BPS 1-10 Rs.170/- P.M.

13. DISCONTINUATION OF RESEARCH ALLOWANCE :- Research allowance will be discontinued w.e.f. 01-12-2001.

14. DAILY ALLOWANCE :- Daily Allowance rates presently fixed with reference to pay drawn shall be increased and related to Basic Pay Scales as under:-

BPS	SPECIAL RATES PER DAY (RS.)	ORDINARY RATES PER DAY (RS.)
1 - 4	110	80
5 - 11	120	100
12 - 16	200	180
17 - 18	350	320
19 - 20	450	400
21 - 22	550	450

15. MEDICAL ALLOWANCE :- Medical allowance to employees in BPS 1-16 shall be increased from Rs. 90/- P.M to Rs. 160/- P.M.

16. COMPUTER ALLOWANCE :- The Computer Allowance shall be increased subject to the existing conditions of admissibility as under:-

EXISTING RATE	REVISED RATE
Rs. 500/- P.M.	Rs. 750/- P.M.
Rs. 1000/- P.M.	Rs. 1500/- P.M.

17. SPECIAL PAYS/ALLOWANCES :- All the Special pay and Allowances admissible on certain posts as percentage of pay are revised subject to the following limits:-

	EXISTING	REVISED
a)	Special Pays/Allowances sanctioned @ 20% and above of pay.	On existing rates subject to a maximum of Rs. 2000/- P.M.
b)	Special Pays/Allowances sanctioned @ 10% - 19% of pay	On existing rates subject to a maximum of Rs. 1500/- P.M.
c)	Special pays/Allowances sanctioned @ 5% - 9% of pay.	On existing rates subject to a maximum of Rs. 1000/- P.M.

PART – III PENSION AND COMMUTATION

18. PENSION :- The Government has made the following reforms in pension/commutation scheme w.e.f. 1-12-2001 in respect of civil pensioners of Provincial Government :-

- Commutation Table shall be replaced by the new commutation Table at Annexure-II to this letter.
- Commutation upto 40% of gross pension shall be admissible at the option of the pensioner.

- c) The additional benefit of 2% - 10% for extra years of service after completion of 30 years of qualifying service in respect of civil pensioners shall be discontinued.
- d) The increase in pension @ 20% - 25% to Civil Pensioners allowed vide this Department's letter No. SOSR.III(FE&TD)4111/81 dated 27-7-1999 shall be discontinued.
- e) The benefit of restoration of surrendered portion of pension in lieu of commutation/gratuity shall be withdrawn.
- f) In future, the increase in pension to the pensioners shall be allowed on net pension instead of gross pension.
- g) All the pensioners shall be allowed an increase in net pension (inclusive of dearness increases allowed in the past) as follows:-

	<u>Increase in net Pension.</u>
i) Pensioners who retired prior to the introduction of 1991 basic pay scales.	15%
ii) Pensioners who retired prior to the introduction of 1994 Basic Pay scales but on or after the introduction of 1991 pay scales.	10%
iii) Pensioners who retired on or after the introduction of 1994 basic pay scales and upto the date of introduction of revised basic pay scales i.e. 1-12-2001.	5%

19. OPTION :- (a) All the existing civil employees (BPS 1 to 22) of the Provincial Government shall within 30 days from the date of issue of this letter, exercise an option in writing, addressed to the Audit office concerned in the case of employees in BPS 16 and above and to the DDO concerned in the case of employees in BPS 15 and below, either to draw pay in the existing Basic Pay Scales of 1994 or in the Revised Basic Pay Scales and Pension/commutation scheme 2001 as specified in this letter. Option once exercised shall be final.

(b) An existing employee as aforesaid, who does not exercise and communicate such an option within the prescribed time limit, shall be deemed to have opted to be governed by the Revised Basic Pay Scales, Pension and Commutation Scheme, 2001.

20. The government servant who retire w.e.f. 1-7-2001 shall be given the benefit of revised pay scales on presumptive basis discounted by 5% increase in Pension if availed, subject to the condition that all those who may like to avail this benefit should opt for the entire package i.e. revised scheme of Basic Pay Scales as contained in Part-I and revised package of pension as contained in Part-III of this letter.

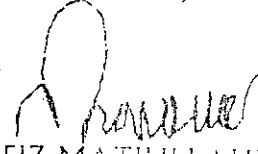
21. The Autonomous/Semi Autonomous Bodies will have the option to adopt this pay package provided they have adopted in totality the Basic Pay Scale Scheme/Pension scheme and if their resources so permit as no additional grant will be provided by the Provincial Government. It will not be applicable to those employees of Bank of Khyber and Public Sectors Corporations and those employees who are governed by the Industrial Relations Ordinance 1969 and/or whose financial terms of service are settled through Collective Bargaining Agents. In case of Autonomous/Semi autonomous Bodies where employees are allowed different pay scales/allowances, the revision of the existing pay scales of their employees shall not be made without consultation of the Finance Department.

22. All existing rules/orders on the subject shall be deemed to have been modified to the extent indicated above. All existing rules/orders not so modified shall continue in force under this scheme.

23. ANOMALIES :- An anomalies Committee in Finance Department comprising Additional Finance Secretary, Additional Secretary (Regulation) Establishment

Department and Deputy Secretary (Regulation), Finance Department shall be set up to resolve the anomalies, if any, arising out of implementation of new package.

Yours obediently



(HAFIZ MATILLAH)

Additional Secretary (Reg./Admn)

Endst. No. FD(PRC) 1-1/2001

Dated Peshawar the, October 27, 2001.

1. All Autonomous & Semi Autonomous Bodies in NWFP
2. The Secretary Finance Department, Government of the Punjab, Sindh and Balochistan, Lahore, Karachi & Quetta.
3. The Secretary Finance Department, Azad Government of the State of Jammu and Kashmir, Muzaffarabad.



(ABDUL LATIF)

Section Officer (SR-I)

Endst. No. FD(PRC) 1-1/2001

Dated Peshawar the, October 27, 2001.

1. The H.Qs 11 Corps Peshawar
2. The Accountant General, NWFP, Peshawar.
3. All district/Agency Accounts Officers in NWFP.
4. The Treasury Officer, Peshawar.
5. The Private Secretary to Finance Minister, NWFP.
6. The P.S to Secretary, PAs to Additional Secretaries/Deputy Secretaries in Finance Department.
7. All Section/Budget Officers in Finance Department, NWFP
8. The Director, Local Fund Audit, NWFP, Peshawar.



(ABDUL LATIF)

Section Officer (SR-I)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1058 /2014

Mumtaz Khan SST, Govt: High
School Tatar Khel District Karak
.....Appellant

Versus

The Chief Secretary Govt: of
Khyber Pakhtunkhwa, Civil
Secretariat, Peshawar and other.

.....Respondents

INDEX

S.No.	Description of Documents	Date	Annexure	Pages
1.	Memo of Service Appeal with Affidavit.			1-5
2.	Copy of Notification of Graded Pay		A	6
3.	Copy of Notification Endst: No.323-403/A-258 dated 04-07-1987.		B	7
4.	Copy of Notification		C	8
5.	Copy of Notification		D	9
6.	Copy of Notification	16-01-2008	E	10-11
7.	Copy of impugned Notification		F	12-13
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Mumtaz Khan

Appellant

Through

Ashraf Ali Khattak

Ashraf Ali Khattak

and

Nawaz Khan Khattak
Advocates, Peshawar

Dated: _____ / 08/ 2014

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,

PESHAWAR

SERVICE APPEAL NO. 1058/2014

Mumtaz Khan SST, Govt: High School Tatar Khel District KarakAppellant.

Versus

1062
11/8/14

1. The Chief Secretary Govt: of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
2. The Secretary Education (E & SE) Govt: of KPK, Civil Secretariat, Peshawar.
3. The Director Education (E & SE) Govt: of Khyber Pakhtunkhwa, Dubgari Gardan, Peshawar.
4. The District Education Officer (E & SE) District KarakRespondents.

Service appeal under section 4 of the Khyber Pakhtunkhwa service Tribunal Act, against the impugned Notification dated 25-05-2010, wherein appellant has been awarded up-gradation (selection grade) from BPS-16 to BPS-17 (personal) with immediate effect and not from the date of his regular appointment as SET (Tech) as his other colleague have been awarded and against which appellant filed departmental appeal, which is still pending without disposal.

Prayer:

On acceptance of the service appeal this Honorable Tribunal may graciously be pleased to declare;

1. the impugned Notification dated 25-05-2010 to the extent of appellant only as illegal, unlawful and without lawful authority and set aside the

11/8/14
re-submitted to
and filed,

11/8/14
20/8/14

same to the extent of appellant only;

- II. declare that appellant is entitled for up-gradation (Selection Grade) w.e.from the date of his regular appointment i.e 17-12-1992 as SET (Tech:) and not from the date of impugned notification; and
- III. direct the respondents to suitably bring amendment in the relevant record accordingly and also grant consequential/back benefits.

Respectfully Sheweth,

Facts giving rise to the present Service Appeal are as under:-

1. That appellant has been serving as SET's (Technical). He has been regularized against his post in the year, 1992 (Annexure-A). He has got longstanding service at his credit with unblemished and clean sheeted conduct record.
2. That the Govt of Khyber Pakhtunkhwa vide Notification Endst: No.323-403/A-258 dated 04-07-1987 (Annexure-B) has announced selection Grade (BPS-17) (personal) in favour of SET (Technical) on the basis of 1/3 formula.
3. That it is pertinent to mention here that respondent No.2 vide his separate Notifications (Annexure- C & D) has awarded selection grade (Up-Gradation) in favour of number of SET (Tech:) with effect from the date of their regular appointment.
4. That it is also pertinent to mention here that respondent No.3 vide Notification dated 16-01-2008 has also awarded up-gradation (selection grade) in favour of numbers of other SET (Tech:) with effect from the date of their regular appointment as SET (Tech:) (Annexure-E).
5. That the appellant was also entitle to treated at par with his colleagues, who have been awarded selection grade with effect from the date of their regular entry in service as SET (Tech:), but the sanctioning authority have treated the appellant differently and has awarded up-gradation with immediate effect (Annexure-F) i.e with effect from 25-01-2010.

6. That being aggrieved from the impugned Notification, appellant preferred departmental appeal/review (Annexure-G), but no heed has been paid to the legitimate request of the appellant till the date, hence the instant appeal inter alias on the following grounds

GROUNDS:-

- A. That the respondents have not treated the appellant in accordance with law, rules and policy and acted in violation of Article 4 of the Constitution of Pakistan, 1973. Appellant was entitled to be awarded selection grade with effect from the date of his regular appointment as per spirit of policy, but have been deprived of his legitimate right without any lawful justification, which is illegal, unlawful and against natural justice, therefore, this Honorable Tribunal has got the jurisdiction to interfere with and require the respondent to take exercise and award up-gradation/selection grade in favour of the appellant with effect from the date of his regular entry into service as SET (Tech:).
- B. That appellant has been discriminated; selection grade in favour of other SET (Tech:) have been awarded with effect from the date of their regular entry into service and whereas, appellant treated differently, which is against the provision of Article 25 and 27 of the Constitution of Pakistan, 1973.
- C. That all public powers are in the nature of trust and public functionaries must act as repository of such trust. In the instant case, appellant had legitimate right to be awarded selection grade with effect from the date of his regular entry into service, but have been denied of the same, which is violation of public trust.
- D. That appellant was entitled to be treated at par with his other colleagues and awarded up-gradation with effect from the date of his regular entry into service, but have been denied the same benefits, which has been awarded to his other colleagues. This act of the respondents is against the spirit of law laid down by the Honourable Supreme Court of Pakistan.

E. That appellant would like to seek the permission of this Honourable Tribunal to advance some more grounds at the time of hearing.

It is therefore, humbly prayed that the appeal may kindly be accepted/allowed as prayed for above.

Any other relief deem appropriate under the law and rules may also be graciously granted.

Mundighan
Appellant

Through

Ashraf Ali Khattak
Ashraf Ali Khattak

And

Nawaz Khan Khattak
Advocates, Peshawar.

Dated: _____ / 08/ 2014

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

SERVICE APPEAL NO. _____/2014

Mumtaz Khan SST, Govt: High School Tatar Khel District KarakAppellant.

Versus

The Chief Secretary Govt: of Khyber Pakhtunkhwa, Civil Secretariat,
Peshawar and others.....Respondents.

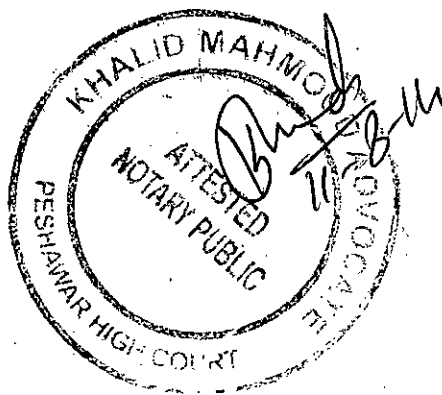
Affidavit

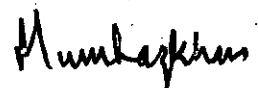
I, Mumtaz Khan SST, Govt: High School Tatar Khel District Karak , do hereby solemnly affirm and declare on oath that the contents of this service appeal are true and correct to the best of my knowledge, and nothing has been concealed from this Hon'ble Court.

Identified by


Ashraf Ali Khattak

Advocate, Peshawar.





Deponent

Anx: A

6

OFFICE OF THE DIRECTOR, SECONDARY EDUCATION, NWFP, PESHAWAR.

GRADED PAY

Consequent upon the decision of NEEB, Service Tribunal, announced on 23-9-1996, Mr: Mumtaz Khan, W.I, Govt; High School, NO: I, Hangu (Kohat), is hereby allowed graded pay scale in B-16 with effect from the date of 1st declaration MA (Technical Education) examination results.

(SYED ABU BAKR BACHA)
DIRECTOR, SECONDARY EDUCATION,
NWFP, PESHAWAR.

Encl: NO: 322/32/1-14/G. Pay/SEN/Vol: 3/96 Dated Pesh: the 2/5/1997.

Copy forwarded to the:-

1. Divl: Director of Education (9) Kohat, Division Kohat.
2. District Education Officer (M) Secondary, Kohat.
3. District Accounts Officer, Kohat.
4. Headmaster, Govt; High School, NO: I, Hangu.
5. Teachers concerned.

Aziz
DEPUTY DIRECTOR SECONDARY,
EDUCATION, NWFP, PESHAWAR.

ZINGOR HAD SHAH/

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Copy from Saeed Ullah Jan, Secretary to Govt. of NWFP, Finance Department Peshawar's NO: FD/SR-I 2-45/75 dated 25.6.76 addressed to the heads of attached department in NWFP, and all other's concerned.

SUBJECT:- RE-DESIGNATION OF THE POSTS OF ASSISTANT WORKSHOP INSTRUCTOR AND WORKSHOP INSTRUCTOR AS JET (TECH:) AND SET (TECH) IN THE EDUCATION DEPARTMENT.

Sir, I am directed to refer to the subject noted above and to say that the case regarding redesignation of the posts of Assistant Workshop Instructor and Workshop Instructor in the Education Department was under consideration of the Govt. for quite sometime. It has now been decided to redesignate these posts and place them in the following Revised Basic Pay Scales noted against each with immediate effect:-

EDUCATION DEPARTMENT.		Existing Basic Scales.	Revised Basic Pay Scales.
S.No	Name of Post.		
1	Asstt: Workshop Instructor (to be redesignated) as Junior English Teacher (Tech:)	i). B-8 ii). 30% of the cadre strength to be in B-11 on regular basic w.e.f 01.7.1982.	B-9 with selection grade equal to 1/3 posts in B-12.
2	Workshop Instructor (to be re-designated as senior English Teacher (Tech:))	i). B-14 ii). 30% of the cadre strength to be in B-16 on regular basis w.e.f 1.7.82.	B-15 with selection grade equal to 1/3rd posts in B-17.

A/B
w/mt
1 for
all
my
12/7

F. I. Khan
File

Yours Obediently Servant,
Sd/-
(MIR LAIQ SHAH)
Additional Finance Secretary, -I
Government of NWFP.

OFFICE OF THE DIRECTOR OF EDUCATION (SCHOOLS) NWFP, PESHAWAR.

Endst: No: 323-403/A-258/Notification Dated Peshawar the 04.7.87.

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

- 1- Addl: Directors, Local Directorate.
- 2- All the Divisional Director's of Education (S) in NWFP,
- 3- All the D.E.O (M&F), for further circulating their subordinate offices.
- 4- Director Bureau of Curriculum & Edu: Extension Centre, NWFP, ATD.
- 5- All the S.D.E.Os (M&F) in NWFP.
- 6- V-AE Local Directorate.
- 7- VII-VE for information, local Directorate.

Sd/-
Deputy Director (Schools)
for/Director of Education, NWFP,

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) ABBOTTABAD.

Endst: No: 23418-517 /F.No: 35/ADMO (ACAD) DATED 06 JULY 1987

Copy of the above is forwarded to the:-
1-97) The Sub Divisional Education Officers (Male) Abbottabad, Haripur and all the Headmasters of Govt: High Schools in District A. Abad for information that it has been decided by the Govt: NWFP, that the posts of W.I & AWI have been re-designate. You are requested to place them in the given revised basic pay scales noted against each with immediate effect.

- 98). Saeed Ullah Jan, Secretary to Govt: of NWFP, Finance Department, Peshawar with reference to his No: FD/SR-I 2-45/75 of 25.6.87.
- 99). Director of Education (S) NWFP, Peshawar for information please
- 100). Director of Education (S) NWFP, Peshawar for information please

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NOTIFICATION

EDUCATION DEPARTMENT
DATED PESHAWAR THE 24.2.1988.

④ ⑧

NO: S.O(S) 1-7/87/ In pursuance of orders contained in Government of NWFP, Finance Department circular letter No: FD(SR.I) 2-45/75 dated, 25.6.1987, the Provincial Government are pleased to award BS-17 as selection grade to the following Senior English Teachers (Technical) (formerly Workshop Instructors) with effect from 25.6.1987:-

Anx: C

1. Mr. Firdous Khan Govt. Tech: High School Peshawar City.
2. Mr. Niaz Mohammad, Govt. High School Dabkor (Mohmand Agy)
3. Mr. Samiullah Govt. Elementary Coll. Janrud (Khyber Agency)
4. Mr. Sultan Bahadar Govt. High School No: I Haripur.
5. Mr. Ghayoor Pervez Govt. Comp: High School Kohat.
6. Mr. Mohammad Sharif Govt. High School Wadudia Saidu Sharif (Swat).
7. Mr. Ghous Ali.
8. Mr. Zia-ud-Din
9. Mr. Abdul Aziz
10. Mr. Inshallah Khan Govt. High School No: I Nowshera Cantt.
11. Mr. Mohammad Nisar G.A.T.T.T.C, Peshawar.
12. Mr. Hidayatullah G.A.T.T.T.C, Peshawar.
13. Mr. Aniq Ahmad G.A.T.T.T.C, Peshawar.
14. Mr. Mohammad Ishaq G.A.T.T.T.C, Peshawar.
15. Mr. Ashfaq Ahmad Govt. High School No: 2 Peshawar City.
16. Mr. Jehan Zeb Govt. High School No: 4 Kakshal Peshawar.
17. Mr. Mohammad Salim Govt. High School Shahbaz Garhi (Mardan)
18. Mr. Mohammad Iqbal Govt. High School No: 2 Peshawar City.
19. Mr. Miftah Gul Govt. High School Pabbi (Nowshera)
20. Mr. Mohammad Aslam Govt. High School Turbela Township.
21. Mr. Hamidullah Khan Govt. High School Paharpur (D.I. Khan)
22. Mr. Mumtaz Khan Govt. High School No: I Kulachi.
23. Mr. Jamshaid Ashraf Govt. High School No: I D.I. Khan.
24. Mr. Aurang Zeb Govt. High School No: I Tank (D.I. Khan)
25. Mr. Abdul Hajeed Govt. High School No: 2 D.I. Khan.
26. Mr. Mohammad Safdar Govt. High School No: 3 D.I. Khan.
27. Mr. Rehmatullah Govt. High School Kirman Kurram Agency.

IFTIKHAR-UD-DIN
Secretary to Govt. of NWFP
Education Department
DATED PESHAWAR THE 24.2.1988.

Endst: NO: S.O(S) 1-7/87.

- Copy forwarded for information & n/action to:-
1. Accountant General NWFP, Peshawar.
 2. Director of Education (Schools) NWFP, Peshawar.
 3. Director of Education (FATA) NWFP, Peshawar.
 4. Director Bureau of Curriculum Development and Education Extension Services A/Abad.
 5. All Divisional Directors of Education (Schools) in NWFP.
 6. District Accounts Officers, Haripur, Kohat, Swat, Mardan, A/Abad and D.I. Khan.
 7. Agency Accounts Officers, Mohmand, Khyber and Kurram Agy.
 8. Manager Govt. Printing Press Peshawar.
 9. Officials concerned.

(SAHIBZAD FAZAL AMIN)
Section Officer (Schools)

Javed*N/

24/2/88
Allc. [Signature]
[Signature]
Asst. Dir. Edu. Officer
(WID) FTY, Peshawar.
True Copy
[Signature]

Already awarded
Total 31

GOVERNMENT OF N.W.F.P.
EDUCATION DEPARTMENT
DATED PESHAWAR THE 4.9.1988

94

NOTIFICATION

Anx: D

NO: S.O(S)1-7/87/ In pursuance of orders obtained in Govt. of NWFP, Finance Department circular letter No: ED(SR, I)2-45/75 dated, 25.6.1987, the Provincial Government are pleased to award BS-17 as selection grade to the following Senior English Teachers (Technical) (Formerly Workshop Instructors) with effect from 25.6.1987:-

1. Mr. Mohammad Zahid G.H.S. Khal (Dir)
2. Mr. Karim Jan G.H.S. No: 2 Peshawar City
3. Mr. Jamshaid Khan G.H.S. Bughdada (Mardan)
4. Mr. Mashal Nawaz G.H.S. Habibullah Khan FR-Bannu

SECRETARY TO GOVT. OF NWFP
EDUCATION DEPARTMENT.

Endst: NO: S.O(S)1-7/87. DATED PESH. THE 4.9.1988.

Copy forwarded for information & n/action to:-

1. Accountant General NWFP, Peshawar.
2. Director of Education (Schools) NWFP, Peshawar.
3. Director of Education FATA, NWFP, Peshawar.
4. Director Bureau of Curriculum Development and Education Extension Centre A/Abad.
5. Divisional Directors of Education (Schools), Peshawar, Mardan and Malekand Divisions.
6. District Accounts Officers, Dir, Mardan and Bannu.
7. Manager Govt. Printing Press Peshawar.
8. Officials concerned.

(SAHIBZADA TAZAL AMIN)
Section Officer (Schools)

Jav: d*N/

27. Mr. Muhammad Yamin SET GHSS Bannu
28. Mr. Abdur Rahim SET GHS Khan (Bajour ASY.) C9.02.1988.

N/P..2..

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NOTIFICATION.

"Anx: E"

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[Handwritten signature]

Consequent upon the approval of the Departmental Promotion Committee(DPC) accorded in its Meeting held on 05.12.2007, the Director Schools & Literacy N.W.F.P., Peshawar is pleased to allow Selection Grade from BPS-16 to, BPS-17 in respect of the following SETs(Tech:) of the School Administration Branch(Men Section) with effect from the dates noted against their names:-

S.No.	Name/Designation/Address.	Awarded S/Grade With effect from.
01.	Mr. Niamatullah SET(Tech:) GHSS No.1 Tank.	25.06.1987 ✓
02.	Mr. Fazlur Rahman SET GHS Akhurwal (FR-Kohat).	25.06.1987 ✓
03.	Mr. Muhammad Ismail SET GHS Akhurwal (FR-Kohat).	25.08.1987 ✓
04.	Mr. Yaqub Khan SET GHS Titer Khel, Lakki.	01.10.1987 ✓
05.	Mr. Muhammad Ayaz Khan SET GHS Karak.	03.10.1987 ✓
06.	Mr. Zahir Shah SET GHS Latamber, Karak.	03.10.1987 ✓
07.	Mr. Amir Manzoor Ullah No.1 Lakki.	04.10.1987 ✓
08.	Mr. Muhammad Nasrat Khan SET GHS No.1, H.Pur.	22.10.1987 ✓
09.	Mr. Aftab Ahmad Shah SET GHS No.2, Haripur.	23.10.1987 ✓
10.	Mr. Zaffar Ahmad SET GHS No.2, Abbottabad.	23.10.1987 ✓
11.	Mr. Muhammad Bashir Khan SET GHS No.2, A.Abad.	23.10.1987 ✓
12.	Mr. Hameedullah Shah SET GHS T/Nasrati, Karak.	23.10.1987 ✓
13.	Mr. Ali Akbar SET GHS Khar(Bajour Agency).	03.11.1987 ✓
14.	Mr. Muhammad Riaz SET GHS Kuladhand(Chd:)	15.12.1987 ✓
15.	Mr. Fazal Dayan SET GHS Khatir Abad(Mardan).	15.12.1987 ✓
16.	Mr. Muhammad Hifzur Rehman SET GHSS Gul Bahar, Peshawar.	16.12.1987 ✓
17.	Mr. Abdul Latif SET GHS Zaida, Swabi.	17.12.1987 ✓
18.	Mr. Jalalud Din SET GHS Miran Shah(MVA).	09.02.1988 ✓
19.	Mr. Asmatullah SET GHSS Kaley (Orakzai).	09.02.1988 ✓
20.	Mr. Zaidur Rahman SET GHS Karak.	09.02.1988 ✓
21.	Mr. Johanzeb SET GHS Habibullah(FR-Bannu).	09.02.1988 →
22.	Mr. Sarwar Shah SET GHS Dab Kor(Mohmand Agy)	09.02.1988 →
23.	Mr. Rahim Gul SET GHS Mohammad Khan Killi (Khyber Agency).	09.02.1988 →
24.	Mr. Noorud Din SET GHS Habibullah(FR-Bannu)	09.02.1988 →
25.	Mr. Sultan Muhammad SET GHS Mohammad Khan Killi(Khyber Agency).	09.02.1988 →
26.	Mr. Majidullah SET GHS Dab Kor(Mohmand Agy:)	09.02.1988 →
27.	Mr. Muhammad Qaim SET GHSS Batkhela(Mkd:)	09.02.1988 →
28.	Mr. Abdur Rahim SET GHS Khar(Bajour Agy:)	09.02.1988 →

N/P..2..

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[Signature]

02.05.1988	Mr. Babbar Seth	30
02.05.1988	Mr. Hakan Khan Seth	31
02.05.1988	Mr. Mahesh Seth (M) Seth	32
02.05.1988	Mr. Hakan Khan Seth (R-Prob)	33
02.05.1988	Mr. Hakan Khan Seth (DIP)	34
02.05.1988	Mr. Hakan Khan Seth (K) Seth	35
02.05.1988	Mr. Hakan Khan Seth No. 1. Khan	36
02.05.1988	Mr. Hakan Khan Seth No. 1. Khan	37
02.05.1988	Mr. Hakan Khan Seth No. 1. Khan	38
02.05.1988	Mr. Hakan Khan Seth (M) Seth	39
02.05.1988	Mr. Hakan Khan Seth (M) Seth	40
02.05.1988	Mr. Hakan Khan Seth (M) Seth	41
02.05.1988	Mr. Hakan Khan Seth (M) Seth	42
02.05.1988	Mr. Hakan Khan Seth (M) Seth	43
02.05.1988	Mr. Hakan Khan Seth (M) Seth	44
02.05.1988	Mr. Hakan Khan Seth (M) Seth	45
02.05.1988	Mr. Hakan Khan Seth (M) Seth	46
02.05.1988	Mr. Hakan Khan Seth (M) Seth	47
02.05.1988	Mr. Hakan Khan Seth (M) Seth	48
02.05.1988	Mr. Hakan Khan Seth (M) Seth	49
02.05.1988	Mr. Hakan Khan Seth (M) Seth	50
02.05.1988	Mr. Hakan Khan Seth (M) Seth	51
02.05.1988	Mr. Hakan Khan Seth (M) Seth	52
02.05.1988	Mr. Hakan Khan Seth (M) Seth	53
02.05.1988	Mr. Hakan Khan Seth (M) Seth	54
02.05.1988	Mr. Hakan Khan Seth (M) Seth	55
02.05.1988	Mr. Hakan Khan Seth (M) Seth	56

DIRECTOR SCHOOLS & TRAINING
 N.W.P., PESHAWAR

Encl: No. 127-27/A-14/SET (Tech) 2/G. Dated Pesh: 12/1/88

Copy forwarded for information and action to the:-
 1. Director of Education (T) Peshawar
 2. Executive District Officers (SET) concerned
 3. District Education Officers concerned
 4. Agency Education Officers concerned
 5. Agency Education Officers concerned
 6. Section Officer (SET) Govt. of Peshawar
 7. Section Officer (SET) Govt. of Peshawar
 8. Teachers concerned (40) to Director SET I. Office

Deputy Director (Establishment)
 Schools & Training PWP, Peshawar



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Dated Peshawar 25-05-2010

NOTIFICATION

NO. SO(PE)2-E/E&SED/DPCMTG/UPGRADATION/10. The Competent Authority on the recommendation of the Departmental Promotion Committee and consultation with Finance department is pleased to allow upgradation from BS-1 to BS-17 (Personal) to the following 1013 Male SETs, 347 Female SETs and 1 Male SET (Tech) with immediate effect subject to the condition that the post of SET shall be downgraded from BS-17 to BS-16 as and when vacated by the incumbents.

1013 MALE SET (GEN)

S.No	Seniority List No.	Name of Officer.	Date of Appointment as Regular SET	Present Place of Posting
1	1286(A)	Nazir ud din	12-6-88	SET GHSS Shamsul Swabi
2	1756	Mohammad Khalid	09-10-89	SET GHS Khollanpala Haripur
3	1954(A)	Muhammad Naeem Shah	7-4-98	SET GHS Naryab Hango
4	2274(A)	Syed Jamil Ahmad Shah	11-1-91	SET GHS Ghora Bazar A.Abed
5	2330-b	Muhammad Zaman	27-07-91	SET GHS Khragi ER-Tank
6	2337(B)	Malik Jan	11-8-91	SET GHS Dara Adamkhel ER-Tank
7	2337(D)	Muhammad Raza	15-04-93	SET GHSS Jamrud ER-Tank
8	2337(E)	Ahmad Khan	20-04-93	SET GHSS Sadoi Kurram Agency
9	2337(G)	Shulam Habib	29-08-93	SET GHS Ashkar Kot SWA
10	2337(H)	Taj Mohammad Khan	5-3-94	SET GHSS Kot Najeerullah Haripur
11	2628	Muhammad Farooq Khan	10-11-94	ADO (AEO) Fateh
12	2703(10)	Faqir Mohammad	21-05-95	SET GHSS Tarnab Charsadda
13	2717	Mr. Fazli Khaliq	23-5-95	SET GHS Mulla Zai Tank
14	3489-a	Akbar Ali	10-02-96	SET GHS Hisar Sara Khyber Agency
15	3489-b	Kamil Khan	10-02-96	SET GHS Sanikhel ER-Konak
16	3530	Muozim Hussain	25-3-96	GHS No.2 Paharod DIK
17	3714	Mr. Rafiq ul Ahmad	25-3-96	SET GCMS Chitral
18	4025(1)	Noorullah Jan	6-5-96	SET GHS Shagai Khyber
19	4025(19)	Sultan Farooq	9-3-96	SET GEC Mir Ali NWA
20	4025(20)	Saad Ullah Khan	18-11-97	SET GMS Palang-e-NWA
21	4027	Mr. Zia Ahmed	15-1-98	SET GHS Dheri Khattakhel NS
22	4030	Mr. Abdullah	15-1-98	GHS Bakura Swabi
23	4032	Mr. Masoodur Rehman	15-1-98	SET GHS Kanigoran SWA
24	4033	Mr. Mazhar Munir	15-1-98	GHSS No.4 DI Khan
25	4034	Mr. Muahar Shah	15-1-98	SET GHS Tor Landi Swabi
26	4036	Mr. Amanawar Hussain	15-1-98	SET GHSS Abu Khail Swabi

Govt
Tech

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310.	1731	Azra Yasmin	12.7.59	SET	GGMS: Rikarakhoo Pawan Peshawar
317.	1732	Riyasat	12.7.59	SET	GGHS: Panj Swabi
318.	1733	Munira Naz	12.7.59	SET	GGMS: Ferozmandi Herat Shah
319.	1734	Chazala, Shabnam	12.7.59	SET	GGHS: Sadd Khwa: Mardan
320.	1735	Ruja	12.7.59	SET	GGHS: Gaudher Swabi
321.	1737	Sajida Nuzhat	12.7.59	SET	GGHS: Mirpur Swabi
322.	1738	Fatimat Ambar	12.7.59	SET	ADD
323.	1740	Fatah Naz	12.7.59	SET	GGHS: Chahar Chah Mardan
324.	1741	Salma Begum	12.7.59	SET	GGHS: Sheheen Camp Peshawar
325.	1742	Nighat Seema	12.7.59	SET	GGHS: Fata Directorate
326.	1743	Hayat Begum	12.7.59	SET	GGHS: Odigram Swabi
327.	1744	Naila Perveen	12.7.59	SET	GGHS: Maiti Swabi
328.	1745	Shakila Naz	13.7.59	SET	GGHS: Shakhel Malakand
329.	1746	Almas Begum	12.7.59	SET	GGHS: Charpanh Swabi
330.	1748	Naila Perveen	12.7.59	SET	GGHS: Gora Durrah Khel Swabi
331.	1749	Razia Toj	12.7.59	SET	GGHS: Hahien Mardan
332.	1751	Yasmin Bibi	12.7.59	SET	GGHS: Wana Malakand
333.	1753	Nasim Akhtar	12.7.59	SET	GGMS: Surok Pori Chappar Fata
334.	1754	Samina Yousof	12.7.59	SET	GGHS: Suban Khwa: Moh: Agy
335.	1755	Gul Pori	12.7.59	SET	GGMS: Waji Khel Fata
336.	1757	Nabila Naz	12.7.59	SET	GGHS: Kanganrahi Kh: Agy
337.	1758	Lubna Begum	12.7.59	SET	GGMS: Haryana: Fata Pesh
338.	1760	Syeda Rozina Kauser	12.7.59	SET	GGHS: Land: A: B: Pesh
339.	1765	Amina Wazeer	12.7.59	SL	GGMS: Jamu shah Khel FR Dik
340.	1767	Shalida Jan	12.7.59	SET	AAEO: Mohd Agency
341.	1772	Wahida Khan	12.7.59	SET	AAEO: Khyber Jinnah
342.	1774	Munira Naz	12.7.59	SET	GGMS: Kohi bahim FR Dik
343.	1776	Anila Zabeer	12.7.59	SET	GGMS: SRD: M: Agy
344.	1780	Noor Nabia	12.7.59	SET	GGHS: Suban Khwa: Moh: Agy
345.	1781	Fatmat Aam	12.7.59	SET	GGMS: Daz Moh: Agy
346.	1782(A)	Nousheena Aam	12.7.59	SET	GGHS: Chamkani Pesh
347.	1782(B)	Nur Jabeen	12.7.59	SET	GGMS: Sragal: Kurram Agency: FATA

1 MALE SET (TECH)

S.No	Seniority List No.	Name of Officer	Date of Appointment/Regular	Present Place of Posting
1	1750	Mumtaz Khan	17.5.59	SET (TECH) GHS: Lalambor Kurram

SECRETARY TO GOVT OF KHYBER PAKHTUNKHWA
 PRIMARY AND SECONDARY EDUCATION DEPARTMENT

Ends; of even no. & date:
 Copy is forwarded to:

- 1) Secretary to Govt of Khyber Pakhtunkhwa Peshawar.
- 2) Special Secretary (Regulation), Establishment Department, Govt of Khyber Pakhtunkhwa Peshawar.
- 3) Secretary to Govt. of Khyber Pakhtunkhwa Peshawar. Finance Department
- 4) Secretary to Chief Minister Khyber Pakhtunkhwa
- 5) PS to Chief Secretary Khyber Pakhtunkhwa

Three Copy
 J.A.

Approved
 To be kept as copy
 Advocate

569-06

IP

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Dated Peshawar 25-05-2010

NOTIFICATION

NO.SO(PE)2-6/E&SED/DPCMTG/UPGRADATION/10: The Competent Authority on the recommendation of the Departmental Promotion Committee and consultation with Finance Department is pleased to allow up-gradation from BS-1 to BS-17 (Personal) to the following 1013 Male SETs, 3471 Female SETs and 1 Male SET (Tech) with immediate effect subject to the condition that the post of SET shall be downgraded from BS-17 to BS-16 as and when vacated by the incumbents:-

1013 MALE SET (GEN)

S.No	Seniority List No.	Name of Officer	Date of Appointment as Regular SET	Present Place of Posting
1	1286(A)	Nazir ud din	12.6.88	SET GHSS Shamozaai Swat
2	1756	Mohammad Khalid	09.10.89	SET GHS Kholianibala Haripur
3	1954(A)	Muhammad Naeem Shah	7.4.98	SET GHS Naryab Hango
4	2274(A)	Syed Jamil Ahmad Shah	11.1.91	SET GHS Ghora Bazran A:Abad
5	2330-b	Muhammad Zamin	27.07.91	SET GHS Khragi FR-Tank
6	2337(B)	Malik Jan	11.8.91	SET GHS Dara Adam Khel FR Kohat
7	2337(D)	Muhammad Riaz	15.04.93	SET GHSS Jamrud
8	2337(87)	Ahmad Khan	20.04.93	SET GMHS Sadda Kurram Agy
9	2337(88)	Ghulam Habib	20.04.93	SET GHS Askari Kot SWA
10	2337(86)	Taj Mohammad Khan	5.3.94	SET GHSS Kot Najeebullah Hango
11	2628	Muhammad Farooq Khan	10.11.94	ADO (AEO) Fata
12	2708(10)	Faqir Mohammad	21.05.95	SET GHSS Tarnaab Charsadda
13	2717	Mr. Fazli Khaliq	23.5.95	SET GHS Mullazai Tank
14	3489-a	Akbar Ali	10.02.96	SET GHS Hisara Bara Khyber Agy
15	3489-b	Kamil Khan	10.02.96	SET GHS Sani Khel FR Kohat
16	3530	Mulazim Hussain	25.3.96	GHS No.2 Paharpur DIK
17	3714	Mr. Rafiq ul Ahmad	25.3.96	SET GCMS Chitral
18	4025(1)	Noorullah Jan	6.5.96	SET GHS Shagai Khyber
19	4025(19)	Sultan Farooq	8.3.90	SET GEC Mir Ali NWA
20	4025(20)	Saad Ullah Khan	18.11.97	SET GMS Palanzai NWA
21	4027	Mr. Zia Ahmed	15.1.98	SET GHS Dheri Khattak Khel NSR
22	4030	Mr. Abdullah	15.1.98	GHS Batakara Swabi
23	4032	Mr. Masoodur Rehman	15.1.98	SET GHS Kanigoram SWA
24	4033	Mr. Mazhar Munir	15.1.98	GHSS No.4 DIKhan
25	4034	Mr. Mutahir Shah	15.1.98	SET GHS Tor Landi Swabi
26	4036	Mr. Munawwar Hussain	15.1.98	SET GHSS Abu Khel Lakki

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316	1731	Azra Yasmia	12.7.99	SET GGMS Pishtakhara Payan Pesh:
317	1732	Riyasat	12.7.99	SET GGHS Pana Swat
318	1733	Sumaira Naz	12.7.99	SET GGMS Zoormandi Kheroshah Malakand
319	1734	Ghazala Shabnam	12.7.99	SET GGHS Lund Khwar Mardan
320	1735	Ruqia	12.7.99	SET GGHS Tour Dheri Swabi
321	1737	Sajida Nuzhat	12.7.99	SET GGHS Mingora Swat
322	1738	Nizakat Ambar	12.7.99	SET ADO Swat
323	1740	Falak Naz	12.7.99	SET GGHS Shahbaz Ghar Mardan
324	1741	Salma Begum	12.7.99	SET GGHS Shaheen Camp Peshawar
325	1742	Nighat Seema	12.7.99	SET GHS Fata Directorate
326	1743	Hayat Begum	12.7.99	SET GGHS Odigram Swat
327	1744	Naila Parveen	12.7.99	SET GGHS Matta Swat
328	1745	Shakila Naz	12.7.99	SET GGHS Skhakot Malakand
329	1746	Almas Begum	12.7.99	SET GGHS Charbagh Swat
330	1748	Naila Parveen	12.7.99	SET GGHS Bara Durash Khel Swat
331	1749	Razia Taj	12.7.99	SET GGHS Hathian Mardan
332	1751	Yasmin Bibi	12.7.99	SET GGHS Miana Malakand
333	1753	Nasim Akhtar	12.7.99	SET GGMS Surok Toor Chaopar Fata
334	1754	Samina Yousaf	12.7.99	SET GGHS Suban Khwar Moh: Agy
335	1755	Gul Pari	12.7.99	SET GGMS Wali Khel Fata
336	1757	Nabila Naz	12.7.99	SET GGHS Karigar Ghari Kh: Agcy
337	1758	Lubna Begum	12.7.99	SET GGMS Haryana Bala Pesh:
338	1760	Syeda Rozina Kauser	12.7.99	SET GGHS Landi Arbab Pesh:
339	1765	Amina Wazeer	12.7.99	SET GGMS Jamu Shah Khel FR Kohat
340	1767	Khalida Jan	12.7.99	SET AAEO Mohd Agency
341	1772	Wahida Khan	12.7.99	SET AAEO Khyber Jamrud
342	1774	Shahida Bibi	12.7.99	SET GGMS Kohi Baham FR DIK
343	1776	Anila Zaheer	12.7.99	SET GGMS SRD M.Agcy
344	1780	Noor Rabia	12.7.99	SET GGHS Subhan Khwar Moh: Agy
345	1781	Farhat Amir	12.7.99	SET GGMS Baz Mohd. Kor M.Agy
346	1782(A)	Nosheena Aziz	12.7.99	SET GGHS Chamkani Pesh:
347	1782(B)	Nur Jabeen	12.7.99	SET GGMS Sragala Kurram Agency FATA

1 MALE SET (TECH)

S.No	Seniority List No.	Name of Officer	Date of Appointment as Regular SET	Present Place of Posting
1	115 C	Mumtaz Khan		SET (TECH) GHS Latamber Karak

SECRETARY TO GOVT OF KHYBER
PAKHTUNKHWA
ELEMENTARY & SECONDARY
EDUCATION DEPARTMENT

Endst; of even no. & date.

- 1) Secretary to Govt. of Khyber Pakhtunkhwa Establishment Department, Peshawar.
- 2) Special Secretary (Regulation), Establishment Department, Govt. of Khyber Pakhtunkhwa, Peshawar.
- 3) Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department, Peshawar.
- 4) Secretary to Chief Minister Khyber Pakhtunkhwa.
- 5) PS to Chief Secretary Khyber Pakhtunkhwa.

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[Signature]

"Anx:G"

14

To

The Secretary Education
Khyberpakhtunkhwa,
Peshawar.

Subject: AWARD OF SELECTION GRADE
Through proper channel

R/Sir

With due respect I beg to submit that I am working in education department against
SST Technical Post w.e.f 01-11-1986

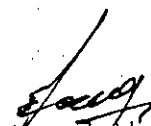
I have been awarded graded pay from 17/12/1992 and was regularise on the post of SST
(Technical).

It is further stated for your kind information that my colleagues who were appointed later
in 1987 were awarded selection grade from the date of appointment while I have been
deprived from this right.(S/Grade)

Hence It is requested in your kind honor that I may kindly be treated as my
colleagues and selection grade may be awarded from date of award of graded pay 17/12/1992.

I shall be thankful to you for this act of kindness

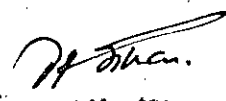
Documents attached:
1)1st appointment order
2)Award of graded pay
3)Colleagues selection grade

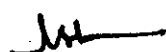

Thanking and oblige

Yours
Mumtaz Khan S.E.T
GHS Tattar khel
Karak(KPK)

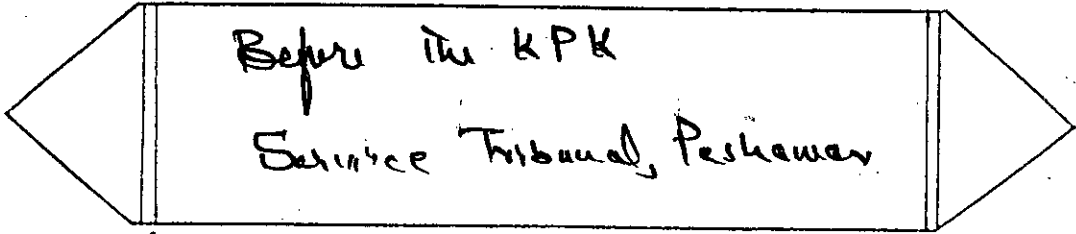
Endst: 728 Dt. 12-4-2014

Forwarded in original
to the DEO (Exe) Karak
for n/a and onward submission pl.


Head Master
G.H.S Tattar Khei
(Karak)

True Copy


بعدالت



مورخہ
مقدمہ
دعویٰ
جرم

ممتاز خان SFT
بنام
Secretary Education
etc

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ۔
آن مقام پشاور کیلئے افسر تعلیمات اسٹڈ نواز خان
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور وصولی چیک دروپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برآمدگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کارروائی 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 با اختیارات حاصل ہوں گے اور اس کا ساختہ
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب سے وہ ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

المرقوم ۱۱ ماہ اگست ۲۰۱۴

و اذ الع

کے لئے منظور ہے۔

بمقام

Attested & Accepted

Munir Khan

Advocate

Munir Khan
SFT (Peshawar)

VAKALATNAMA

IN THE COURT OF RPK Service Tribunal Peshawar

1058/2014 OF 2015

Mumtaz Khan

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Education Deptt:

(RESPONDENT)
(DEFENDANT)

I/We Mumtaz Khan

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. 22 / 9 / 2015

Mumtaz Khan

CLIENT

ACCEPTED

**NOOR MOHAMMAD KHATTAK
(ADVOCATE)**

OFFICE:

Room No.1, Upper Floor,
Islamia Club Building, Khyber Bazar,
Peshawar City.

Phone: 091-2211391

Mobile No.0345-9383141

VAKALATNAMA

IN THE COURT OF KPK Service Tribunal Peshawar

OF 2016

Mumtaz Khan

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Education Deptt:

(RESPONDENT)
(DEFENDANT)

I/we Mumtaz Khan

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. ____/____/2016

Mumtaz Khan
CLIENT

NOOR MOHAMMAD KHATTAK
ACCEPTED

NOOR MOHAMMAD KHATTAK
(ADVOCATE)

OFFICE:

Room No.1, Upper Floor,
Islamia Club Building, Khyber Bazar,
Peshawar City.

Phone: 091-2211391

Mobile No.0345-9383141

43

BEFORE THE HONORABLE KHYBER PAKHATUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No: 1058/2014

Mumtaz Khan SST GHS Tatar Khel District Karak

.....Appellant

VERSUS

Secretary E&SE Department, Khyber Pakhtunkhwa & others.

.....Respondents

PARAWISE COMMENTS ON & FOR BEHALF OF RESPONDENTS 1-4.

Respectfully Sheweth :-

The Respondents submit as under:-

PRELIMINARY OBJECTIONS.

- 1 That the Appellant has got no cause of action/ locus standi.
- 2 That the instant Service Appeal is badly time barred.
- 3 That the Appellant has concealed material facts from this Honorable Tribunal in the instant service appeal.
- 4 That the instant service appeal is based on malafide intentions just to put extra pressure on the Respondents for gaining illegal service benefits.
- 5 That the Appellant has not come to this Honorable Tribunal with clean hands.
- 6 That the Appellant is not entitled for the relief he has sought from this Honorable Tribunal.
- 7 That the instant Service Appeal is against the prevailing law & rules.
- 8 That the Appellant has been treated as per law, rules & Policy.
- 9 That the instant appeal is not maintainable in its present form.
- 10 That the appeal is bad for mis-joinder & non-joinder of the necessary parties.
- 11 That the instant Service Appeal is barred by law.
- 12 That the Appellant is not competent to file the instant appeal against the Respondents.
- 13 That the impugned Notification dated 16-2-2000 is legally competent.
- 14 That the scheme of grant of Selection Grade has been discontinued vide Notification dated 27-10-2001 by the Finance Department Govt: of Khyber Pakhtunkhwa.

ON FACTS.

- 1 That Para-I is incorrect & misleading on the grounds that the appellant has been granted graded pay vide office order dated May, 1998 in compliance of the judgment dated 23-9-1996 against the post of Workshop Instructor (WI) on the basis of his result declaration, of his MA(Technical Education) whereas rest of para relates to the service period of the appellant, hence needs no comments. (copy of the said order attached as Annexure-A).


- 42
- 2 That Para-2 is incorrect & denied. The scheme of the grant of selection grade has been discontinued by the Finance Department Govt: Of Khyber Pakhtunkhwa, vide Notification No: FD(PRC) 1-1/2001 dated 27-10-2001, hence in terms of the above said Notification, the appellant is not entitled for the grant of selection grade against the above mentioned post (copy of the said Notification as Annexure-B).
 - 3 That Para-3 is also incorrect & denied on the grounds that the scheme of the grant of selection grade has been discontinued vide the above said Notification attached as Annexure-B.
 - 4 That Para-4 is incorrect & misleading. The appellant does not fall within the ambit & batch with those civil servants who have been allowed selection grade vide Notification dated 16-01-2008 by the Respondent Department.
 - 5 That Para-5 is also incorrect & denied. The date of the service regularization of the appellant is May, 1998, whereas the referred Notification dated 16-01-2008 is upto the batch of 1989, hence the appellant has been made not entitled for the grant of selection grade neither he can be treated at par with the those officials who have been granted / allowed selection grade in terms of the Notification dated 27-10-2011 issued by the Finance Department.
 - 6 That Para-6 is also incorrect & misleading. The appellant has not filed any departmental appeal for the grant of selection grade against the above mentioned post of SET/ SST in the light of above made submissions, however the Respondents further submits on the following grounds inter alia:-

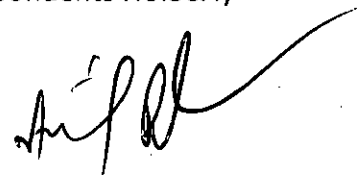
ON GROUNDS.

- A Incorrect not admitted. The Respondents have acted as per law , rules & procedure and have not violated any kind of fundamental rights of the appellant in the instant case. Hence this ground is also liable to be rejected in the light of the Notification dated 27-10-2001 of the Finance Department in favour of the Respondents.
- B Incorrect & not admitted. The appellant is not entitled for the grant of selection grade in terms of the above referred Notification, nor he has been discriminated in the instant case by the Respondents.
- C Incorrect & denied. The statement of the appellant is without any cogent reason & proof in this ground, hence is liable to be dismissed.
- D Incorrect & denied. The scheme of selection grade has been discontinued by the Govt: of Khyber Pakhtunkhwa, vide Notification No: FD(PRC) 1-1/ 2001 dated 27-10-2001 issued by the Govt: of Khyber Pakhtunkhwa, Finance Department. Hence the appellant is not entitled for the grant of the selection grade against the above mentioned post in the given circumstances .

41
E) Incorrect & denied. Legal, however the Respondents seek leave of this Honorable Service Tribunal to submit additional grounds & record in the time of arguments.

In view of the above made submissions, it is requested that this Honorable Tribunal may very graciously be pleased to dismiss the instant service appeal with cost in favour of the Respondent Department.

13/1/2016

Director
E&SE Khyber Pakhtunkhwa,
Peshawar.
(Respondents No:3&4)


Secretary
E&SE Khyber Pakhtunkhwa,
Peshawar.
(Respondent No: 1&2)

AFFIDAVIT

I, Kh. Rehman, Asstt: Director (Litigation-II) E&SE Department KPK Peshawar do hereby solemnly affirm and declare on oath that the contents of the instant Parawise Comments are true & correct to the best of my knowledge & belief.


Deponent

Amx: A

8

8

DIRECTOR OF THE DIRECTOR OF SECONDARY EDUCATION, NWFP, PESHAWAR.

GRADE PAY

Consequent upon the decision of NWFP Service Tribunal, announced on 27-9-1996, Mr: Mustaz Khan, W.I, Govt; High School, NO I, Hanga (Kohat), is hereby allowed grade pay scale An 2-16 with effect from the date of his declaration NA (Technical Education) Examination results.

(SYED ABU SAJID BACHA)
DIRECTOR OF SECONDARY EDUCATION,
NWFP, PESHAWAR.

Encl: NO: 20/2-30/1-14/G. Pay/SEF/Vol; 3/95 Dated Pesh, the 2/5/1997.

Copy forwarded to the:-

- 1- Divl: Director of Education (3) Kohat Division Kohat.
- 2- District Education Officer (P) Secondary, Kohat.
- 3- District Accounts Officer, Kohat.
- 4- Headmaster, Govt; High School, NO: I, Hanga.
- 5- Teachers concerned.

Asghar
DIRECTOR OF SECONDARY EDUCATION,
NWFP, PESHAWAR.

SYED ABU SAJID BACHA

True Copy

Asghar

OFFICE OF THE DIRECTOR SECONDARY EDUCATION, NWFP,
PESHAWAR

ORDER PAY:

Consequent upon the decision of NWFP, Services Tribunal, announced on 23.09.1996, Mr. Mumtaz Khan, W.I. Govt: High School No.I, Hangu (Kohat), is hereby allowed graded pay scale in B-16 with effect from the date of declaration MA(Technical Education) Examination results.

Sd/-
(Syed Abu Sajid Bacha)
Director Secondary Education,
Peshawar

Endst No.322630/B-14/G-Pay/Set/Vol:3/95 Dated Pesh; the 05.05.1998.

Copy forwarded to the:-

1. Divl: Director of Education () Kohat, Division Kohat.
2. District Education Officer (M) Secondary, Kohat.
3. District Accounts Officer, Kohat.
4. Headmaster, Govt: High School, No.I, Hangu.
5. Teachers conned.

Sd/-
Deputy Director Secondary
Education, NWFP, Peshawar

ANN

GOVERNMENT OF N-W.F.P.
FINANCE DEPARTMENT

No. FD(PRC)1-1/2001
Dated Peshawar the, October 27, 2001.

From:-

The Secretary to Government of NWFP,
Finance Department.

To

1. All Administrative Secretaries to Government of NWFP.
2. The Senior Member Board of Revenue, NWFP.
3. The Secretary to Governor NWFP, Peshawar.
4. The Secretary, Provincial Assembly, NWFP.
5. All Heads of Attached Departments NWFP.
6. All District Coordination Officers/Political Agents/ District and Sessions Judges NWFP.
7. The Registrar, Peshawar High Court, Peshawar.
8. The Chairman, NWFP, Public Service Commission.
9. The Chairman, NWFP, Service Tribunal, Peshawar.
10. The Secretary Board of Revenue, NWFP, Peshawar.

Subject:-

REVISION OF BASIC PAY SCALES AND FRINGE BENEFITS OF CIVIL EMPLOYEES (BPS 1 - 22) OF THE N.W.F.P. GOVERNMENT (2001).

Sir,

I am directed to state that the Governor of the NWFP has been pleased to sanction, with effect from December 1, 2001, a scheme of the Basic Pay Scales, Allowances and Pensions, 2001 for the Civil employees of the Government of NWFP in BPS 1 to BPS 22 as detailed below:-

PART I - BASIC PAY SCALES AND ALLIED MATTERS.

2. BASIC PAY SCALES :- The existing Basic Pay Scales and the revised Basic Pay Scales are shown in Annexure-I to this letter. The revised basic pay scales shall

PAY FIXATION OF EMPLOYEES IN SELECTION GRADE AND THOSE WHO HAVE MOVED OVER TO HIGHER SCALE.

Pay of an existing employee drawing pay by move over shall be fixed with reference to the pay scale of the post for the time being held by him. In case the employee was drawing pay in Selection Grade, his pay will be fixed in the Selection Grade pay scale. The stage of fixation will be arrived at after allowing increments on notional basis in the original scale of the post or the Selection Grade, in 1994 Basic Pay Scales, upto the point of existing pay. Pay of the employees will then be fixed at the relevant stage in the revised pay scales 2001.

EXAMPLE I

Assistant, BPS-11 Selection Grade, BPS 15, Move over BPS 16 and in receipt of Pay of Rs. 5490/- Pay will be fixed in BPS-15 i.e. Selection Grade pay scale at Rs. 8320/- as under :-

	Stage 15	Stage 16	Stage 17	Stage 18	Stage 19
1994 Scale	4845	5022	5199	5376	5553
2001 Scale	7260	7525	7790	8055	8320

EXAMPLE II

Pay fixation of an employee in BPS-11 who has moved over to BPS-14 and is in receipt of basic pay of Rs. 4480/- will be fixed after allowing notional increments in BPS-11 of 1994 Basic Pay Scales upto the stage of basic pay drawn. Pay in revised BPS-11 will be fixed at the corresponding stage of Rs. 6790/- as under:-

BPS-11	Stage 15	Stage 16	Stage 17	Stage 18	Stage 19	Stage 20	Stage 21	Stage 22	Stage 23	Stage 24
1994 Pay Scale	3465	3581	3697	3813	3929	4045	4164	4277	4393	4509
2001 Pay Scale	5215	5390	5565	5740	5915	6090	6265	6440	6615	6790

EXAMPLE-III

Pay Fixation of an employee in BPS-5 who has moved over to BPS-11 and is in receipt of basic pay of Rs. 3465/- will be fixed after allowing notional increments in BPS-5 of 1994 BPS upto the stage of basic pay drawn. Since basic pay of Rs. 3465/- is beyond the 30 stages in notional BPS-5, (1994 BPS), and resultantly more than the 30 stages of BPS-2001, therefore, his pay will be fixed at the notional 32nd stage i.e. at Rs.5300/-. The difference of Rs. 200/- (Rs.5300 - 5100) will be personal to him as under:-

	Stage- 30	Stage - 31	Stage - 32
BPS-5-1994	3380	3446	3512
BPS-5 2001	5100	5200	5300

In such cases future increments upto a maximum of 3 years will also be allowed as personal to such employees:

9. DATE OF INCREMENT:- Annual increment shall continue to be admissible subject to the existing conditions, on the 1st December each year.

10. SPECIAL PAYS/ALLOWANCES FOR OFFICES :- The Special Pays/ Allowances sanctioned to offices as percentage of pay shall be discontinued on the introduction of revised pay scales w.e.f 1-12-2001 and adjusted in future increments.

11. ADVANCE INCREMENTS :- The existing scheme of advance increments is discontinued w.e.f. 1-12-2001. A fresh scheme, if any, will be introduced in due course.

PART II ALLOWANCES.

12. Conveyance Allowance :- The rates of existing Conveyance Allowance and Motorcycle/Motorcar maintenance allowance presently fixed with reference to pay drawn shall be increased and related to Basic Pay Scales as follows:-

S.No.	EXISTING	REVISED
i.	Government servants drawing pay in BPS-16 (Gazetted) and above and maintaining motorcar not registered for commercial purpose. Rs.355/-P.M.	BPS-16 (Gazetted) and above Rs.620/-P.M.
ii.	Government servants drawing pay of Rs. 3240/- per month and above other than those at (i) above Rs.193/- P.M.	BPS-11 and above Rs.340/- P.M.
iii.	Government servants drawing pay of Rs.1688/- per month and above but less than Rs. 3240/- P.M. and maintaining Motorcycle/Scooter. Rs.130/- P.M.	BPS 1 - 10 maintaining Motorcycle/Scooter Rs.230/- P.M.
iv.	Others Rs.96/- P.M.	BPS 1-10 Rs.170/- P.M.


13. DISCONTINUATION OF RESEARCH ALLOWANCE :- Research allowance will be discontinued w.e.f. 01-12-2001.

14. DAILY ALLOWANCE :- Daily Allowance rates presently fixed with reference to pay drawn shall be increased and related to Basic Pay Scales as under:-

BPS	SPECIAL RATES PER DAY (RS.)	ORDINARY RATES PER DAY (RS.)
1 - 4	110	80
5 - 11	120	100
12 - 16	200	180
17 - 18	350	320
19 - 20	450	400
21 - 22	550	450

Department and Deputy Secretary (Regulation), Finance Department shall be set up to resolve the anomalies, if any, arising out of implementation of new package.

Yours obediently



(HAFIZ MATIULLAH)

Additional Secretary (Reg./Admn)

Endst. No. FD(PRC) 1-1/2001

Dated Peshawar the, October 27, 2001.

1. All Autonomous & Semi Autonomous Bodies in NWFP
2. The Secretary Finance Department, Government of the Punjab, Sindh and Balochistan, Lahore, Karachi & Quetta.
3. The Secretary Finance Department, Azad Government of the State of Jammu and Kashmir, Muzaffarabad.




(ABDUL LATIF)

Section Officer (SR-I)

Endst. No. FD(PRC) 1-1/2001

Dated Peshawar the, October 27, 2001.

1. The H.Qs 11 Corps Peshawar
2. The Accountant General, NWFP, Peshawar.
3. All district/Agency Accounts Officers in NWFP.
4. The Treasury Officer, Peshawar.
5. The Private Secretary to Finance Minister, NWFP.
6. The P.S to Secretary, PAs to Additional Secretaries/Deputy Secretaries in Finance Department.
7. All Section/Budget Officers in Finance Department, NWFP.
8. The Director, Local Fund Audit, NWFP, Peshawar.



(ABDUL LATIF)

Section Officer (SR-I)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,

PESHAWAR.

C.M. No. ____/2015

In

Service Appeal No. 1058/2014

Mumtaz Khan.....(Appellant)

VERSUS

Secretary Education and others.....(Respondents)

**APPLICATION FOR RECTIFICATION/
AMENDMENT IN THE PRAY PORTION
OF THE MAIN APPEAL.**

Respectfully Sheweth:

1. That the above mentioned Service Appeal is pending adjudication before this Hon'ble Court which is fixe for 07/05/2015.
2. That erroneously the pray portion of the main appeal has been written down in contravention of the departmental appeal which is liable to be rectified and to bring the same in line with the departmental appeal.

Allowed.

7/5

It is, therefore, respectfully prayed that on acceptance of this application, the above motioned rectification/ amendment may kindly be allowed.

Appellant

Through

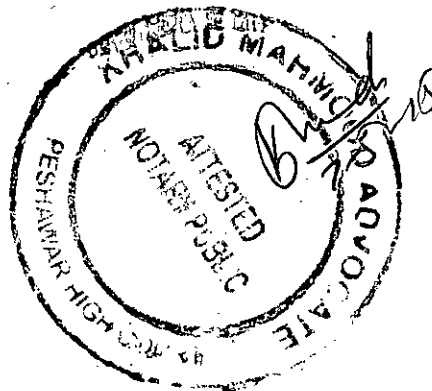


Dated: 07/05/2015

Ashraf Ali Khattak
Advocate High Court,
Peshawar.

AFFIDAVIT:

I, **Ashraf Ali Khattak** Advocate, Peshawar, as per instructions of my client do hereby solemnly affirm and declare, that the contents of the **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.




ADVOCATE

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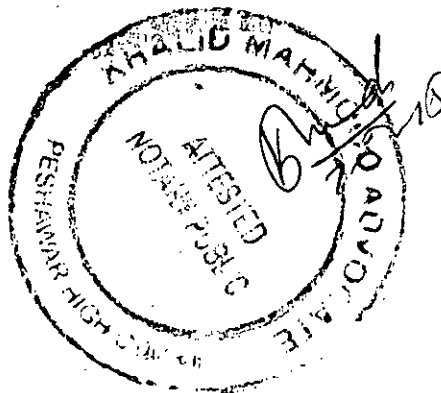
Through

Dated: 07/05/2015


Ashraf Ali Khattak
Advocate High Court,
Peshawar.

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PESHAWAR.

C.M. No. ____/2015

In

Service Appeal No. 1058/2014

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Appellant

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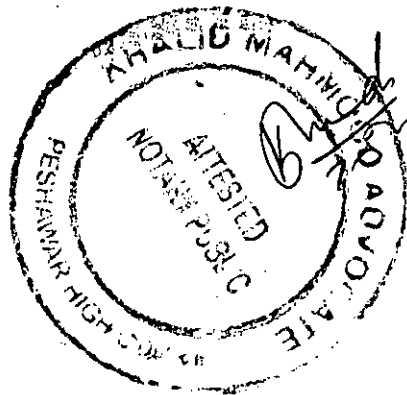



Dated: 07/05/2015

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Advocate High Court,
Peshawar.

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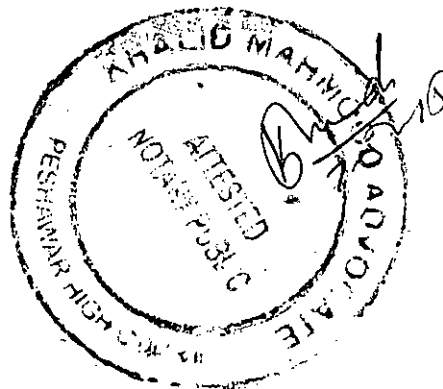
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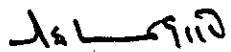
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Ashraf Ali Khattak
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ADVOCATE