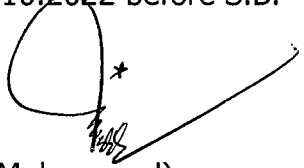


01.09.2022

Learned counsel for the appellant present. Mr. Naseer-Ud-Din Shah, Assistant Advocate General alongwith Mr. Murtaza, Superintendent for the respondents present.

Reply/comments on behalf of respondents submitted which are placed on file. Copy of the same is handed over to learned counsel for the appellant. Learned counsel for the appellant requested for adjournment. Adjourned. To come up for preliminary hearing on 10.10.2022 before S.B.

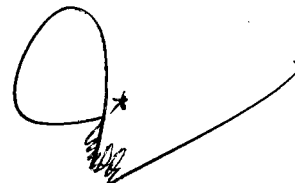


(Mian Muhammad)
Member (E)

18.05.2022

Appellant with counsel present. Mr. Muhammad Adeel Butt, Addl. AG for the respondents present.

Reply/comments on behalf of respondents not submitted. Learned AAG seeks time to contact the respondents for submission of reply/comments. Adjourned. To come up for preliminary hearing as well as reply/comments on 24.06.2022 before S.B.



(Mian Muhammad)
Member (E)

24th June, 2022

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

Pre-admission notice was given to the other side on 17.12.2021 but till date the respondents have not filed the same, therefore, the right for submission of reply is struck off. To come up for arguments on pre-admission on 01.09.2022 before S.B.

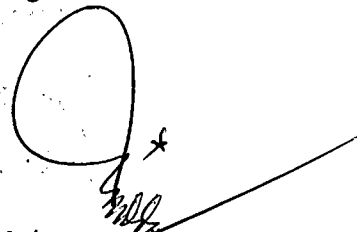


(Kalim Arshad Khan)
Chairman

17.12.2021

Counsel for the appellant present. Preliminary arguments heard.

Learned counsel for the appellant contended that the appellant is aggrieved of the impugned order dated 11.10.2017 whereby the appellant was promoted to the post of SST with immediate effect. She preferred departmental appeal against the impugned order on 25.10.2017 which was not responded within the statutory period, hence, the instant service appeal was filed in the Service Tribunal on 12.10.2021. It was further contended that juniors to the appellant have been promoted with retrospective effect i.e 2014 whereas the same benefits are not extended to the appellant. Learned counsel for the appellant was asked to clarify the delay/ point of limitation which he could not clarify. There is no application for condonation of delay to have been submitted alongwith memorandum of service appeal. It is therefore, appropriate that pre-admission notice be issued to the official respondents to submit their reply/parawise comments and assist the Tribunal. Adjournd. To come up for preliminary hearing on 22.02.2022 before S.B.

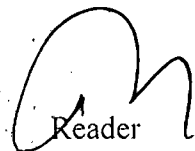


(Mian Muhammad)

Member(F)

22.02.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 18.05.2022 for the same as before.



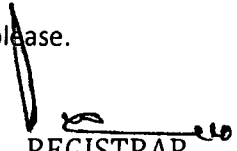

Reader

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 7582 ~~758~~/2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	12/10/2021	<p>The appeal of Mst. Kausar Parveen presented today by Mr. Abdur Rehman Mohmand Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-		<p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put there on <u>17/12/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

49-B

4. That even law favours adjudication of cases on merit rather on technicalities.
5. That there is no legal bar on acceptance of this petition.

It is therefore requested that on acceptance of this petition the above titled appeal may kindly be condoned in the best interest of justice.

Appellant

Through



Abdur Rahman Mohmand

Advocate High Court Peshawar.

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

S.A.No. 7582/2021.

MST. KAUSAR PARVEEN SST GENERAL

----- APPELLANT.

VERSUS

GOVERNMENT OF KHYBER PAKHTUNKHWA & OTHERS.

.....RESPONDENTS

INDEX

S.No	Description of Documents	Annex	Pages
A	SERVICE APPEAL		1-6
B	ADDRESS OF THE PARTIES		7
1.	Copies of CNIC	A	8
2.	credentials/ degree	A-1 to A-5	9-13
3.	Copy of appointment letter	B	14
4.	Copy of the Notification No.SO(PE)/4-5/SSRC/Meeting/2013/Teaching Cadre Dated 24 TH July, 2014	C	15-21
5.	Copy of the letter No.4954 dated 07.08.2014 of Respondent No.2 department	D	22
6.	Copy of the said Notification Endst No.10910-92 dated 01.11.2014	E	23-25
7.	Copy of letter No.2587-2601 dated 09.03.2015,	F	26
8.	Copy of promotion order/letter Endst No.15751-800 dated 11.10.2017	G	27-27/A
9.	Copy of Notification Peshawar, dated the November 13, 2012	H	28-43
10.	Copy of the up gradation Notification No.SO (B & A)/1-18/E&SE/2012 dated Peshawar, 11.07.2012	I	44-45
11.	Copy of Departmental Appeal dated 25.10.2017	J	46-47
12.	Copy of Reminder application dated 15.01.2018	K	48
13.	Copy of the Application dated 11.06.2018	L	49

Petitioner

Through

Abdur Rahman Mohmand Advocate.

DATED: 09.10.2021

CELL:03005991598

1

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

S.A.No...../2021.

MST. KAUSAR PARVEEN SST GENERAL (BPS-16)
PRESENTLY AT ASSISTANT DISTRICT EDUCATION OFFICE
(FEMALE) GHALLANI DISTRICT MOHMAND GOVERNMENT
OF KHYBER PAKHTUNKHWA EDUCATION DEPARTMENT.

----- **APPELLANT.**

VERSUS

1. GOVERNMENT OF KHYBER PAKHTUNKHWA THROUGH
SECRETARY ELEMENTARY AND SECONDARY EDUCATION
SECRETARIATE BUILDING PESHAWAR.
2. DIRECTOR ELEMENTARY AND SECONDARY EDUCATION
DIRECTORATE OF ELEMENTARY AND SECONDARY
EDUCATION KHYBER PAKHTUNKHWA, PESHAWAR.
3. DIRECTOR EDUCATION FATA, FATA SECRETARIAT
KHYBER PAKHTUNKHWA, WARSAK ROAD PESHAWAR.
4. AGENCY EDUCATION OFFICER EDUCATION OFFICE
GHALLANAI DISTRICT MOHMAND.

----- **RESPONDENTS**

**APPEAL U/S 4 OF THE SERVICE TRIBUNAL ACT, 1974
AGAINST ORDER DATED 11.10.2017 OF RESPONDENT
NO.3 FOR NON OBSERVANCE OF
PROMOTION/SENIORITY ORDER OF THE APPELLANT
FROM THE DATE OF NOTIFICATION NO.SO(PE)/4-
5/SSRC/MEETING/2013/TEACHING CADRE DATED 24TH
JULY, 2014 FOR PROMOTION OF PSHT/SPST/PST TO
SST (GENERAL) BPS-16, PASSED BY THE GOVERNMENT
OF KHYBER PAKHTUNKHWA ELEMENTARY AND
SECONDARY EDUCATION BASED ON DISCRIMINATION,
VIOLATION OF FUNDAMENTAL RIGHT AND AGAINST
KHYBER PAKHTUNKHWA CIVIL SERVANTS
(APPOINTMENT, PROMOTION AND TRANSFER RULES,
1989).**

.....
RESPECTFULLY SHEWETH!

1. That the Appellant is a naturally born law abiding citizen of the
Islamic Republic of Pakistan and is qualified up to Master of Urdu

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and Master of Education (M.ED).(Copies of CNIC is annexure "A" and credentials/ degree is annexure "A-1 to A-4").

2. That the Appellant was appointed as regular Certified Teacher (CT) on dated 09.10.1986 by your worthy department and has performed her duties on different locations with honesty and full devotion and has been a responsible, hard worker, skillful, dutiful, punctual and obedient teacher and presently the Appellant has promoted to the post of Secondary School Teacher (SST BPS-16) and is posted at GGMS Dawat Kor Tehsil Halimzai District Mohmand. (Copy of appointment letter is Annexure "B").
3. That the Respondent No.1 i.e Government of Khyber Pakhtunkhwa Elementary and Secondary Education through NOTIFICATION NO.SO(PE)/4-5/SSRC/MEETING/2013/TEACHING CADRE DATED 24TH JULY, 2014 had issued criteria for promotion of teachers to next grades, which was equally applicable to provincial as well as employees working in Ex-FATA. (Copy of the Notification No.SO(PE)/4-5/SSRC/Meeting/2013/Teaching Cadre Dated 24TH July, 2014 is annexure "C").
4. That the Respondent No.2, Deputy Director (Estab) Elementary & Secondary Education Khyber Pakhtunkhwa through letter No.4954 dated 07.08.2014 and letter No.4874 dated 06.08.2014 requested Respondent No.3 to fill the vacant posts of SST (General/Science) in Government Higher Secondary/High & Middle Schools (M&F) FATA by promotion of in-service teachers under the existing rules. (Copy of the letter No.4954 dated 07.08.2014 of Respondent No.2 department is annexure "D").
5. That after requesting again and again by the Deputy Director (Estab) Elementary & Secondary Education Khyber Pakhtunkhwa through different letters Respondent No.3 & 4 delayed the process and did not consider the Appellant from her due date of promotion.
6. That following the above mentioned same Notification, the District Education Officer Male Charsadda through Endst No.10910-92 dated 01.11.2014 promoted 77 SCTs/CTs, SDMs/DMs, SATs/ATs, STTs/TTs, Senior Qaris/Qaris, PSHTs/SPSTs, to the post of SST (Bio-Chem), SST (Phy-Maths), SST(General) BPS-16. (Copy of the said Notification Endst No.10910-92 dated 01.11.2014 is annexure "E").
7. That after quit length of time, through letter No.2587-2601 dated 09.03.2015, the Respondent No.3, wrote a letter to all the Agency Education Officers FATA to prepare category wise list (Male/Female) as per given proforma along with photo copies of the documents of the candidates for promotion against the post of SST. (Copy of letter No.2587-2601 dated 09.03.2015, of the Respondent No.3 is annexure "F").
8. That the Respondent No.3 and 4 have not observed the appellant promotion from her due date i.e 24th July,2014 according to Notification but delay the matter and lastly has order the same through letter Endst No.15751-800 dated 11.10.2017 after a long time, So Appellant has not been treated in accordance with law, and appellant rights secured and guaranteed under the law and constitution have been violated.(Copy of promotion order/letter

Endst No.15751-800 dated 11.10.2017 of Respondent No.3 is annexure "G")

9. That this order of Respondent No.3 has affected the Seniority/promotion of the Appellant because the Seniority of the SST teachers in Khyber Pakhtunkhwa and FATA are the same and not considering the appellant from the due date adversely affect the appellant right for seniority in Subject Specialist (SS) posts in Higher Secondary School as well as Headmasters in High Schools which is clear violation of fundamental rights of Appellant and against Notification Peshawar, dated the November 13, 2012. (Copy of Notification Peshawar, dated the November 13, 2012 is annexure "H").
10. That the appellant time and again visited/requested the respondents to follow the said rules but all in vain. It is pertinent to mention here that the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Department through Notification No.SO (B & A)/1-18/E&SE/2012 dated Peshawar, 11.07.2012 passed up gradation order of the posts for Grant of Incentive of Higher Pay Scale to different Categories/Cadres of teachers in Elementary & Secondary Education Department and the same order was applied upon appellant. (Copy of the up gradation Notification No.SO (B & A)/1-18/E&SE/2012 dated Peshawar, 11.07.2012 is annexure "I")
11. That feeling aggrieved from the order dated 11.10.2017, the Appellant filed Departmental Appeal on dated 25.10.2017, before Respondent No.3.(Copy of Departmental Appeal dated 25.10.2017 is annexure "J").
12. That the Appellant frequently visited the office of Respondent No.3 for consideration of her departmental appeal but the official Authority delayed the matter and wants some more time for consideration, for which the appellant sent another reminder for consideration of departmental appeal on dated 15.01.2018.(Copy of Reminder application dated 15.01.2018 is annexure "K").
13. That the Appellant was informed that her departmental Appeal is under consideration and will be discussed with Respondents No. 2, but again respondents No.3 and 4 delayed the matter and lastly appellant sent another application on dated 11.06.2018 for consideration of her departmental appeal. (Copy of the Application dated 11.06.2018 is annexure "L").
14. That due to the above mentioned reasons the **Appellant** has no option but to knock the door of this honorable Court for his fundamental rights guaranteed under the constitution of Islamic republic of Pakistan, 1973.
15. That due to above mentioned reasons since seniority of the appellant was disturbed, Appellant had therefore locus standi to file this appeal on the following grounds amongst others.

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

S.A.No...../2021.

**MST.KAUSAR PARVEEN VERSUS GOVERNMENT OF KHYBER
PAKHTUNKHWA THROUGH SECRETARY ELEMENTARY
AND SECONDARY EDUCATION PESHAWAR AND OTHERS.**

ADDRESSES OF THE PARTIES:

APPELLANT:

KAUSAR PARVEEN SST GENERAL (BPS-16) R/O GHALLANI
COLONY TEHSIL GHALLANI DISTRICT MOHMAND
GOVERNMENT OF KHYBER PAKHTUNKHWA EDUCATION
DEPARTMENT.

RESPONDENTS:

1. GOVERNMENT OF KHYBER PAKHTUNKHWA THROUGH
SECRETARY ELEMENTARY AND SECONDARY EDUCATION
SECRETARIATE BUILDING PESHAWAR.
2. DIRECTOR ELEMENTARY AND SECONDARY EDUCATION
DIRECTORATE OF ELEMENTARY AND SECONDARY
EDUCATION KHYBER PAKHTUNKHWA, PESHAWAR.
3. DIRECTOR EDUCATION FATA, FATA SECRETARIAT
KHYBER PAKHTUNKHWA, WARSAK ROAD PESHAWAR.
4. AGENCY EDUCATION OFFICER EDUCATION OFFICE
GHALLANAI DISTRICT MOHMAND.

.....

DATED:14.09.2021

Kausar

APPELLANT

THROUGH

*Ra
hman*

ABDUR RAHMAN MOHMAND
ADVOCATE HIGH COURT PESHAWAR.

8 Amx "A"



PAKISTAN National Identity Card

Name: Kausar Parveen



Husband Name: Faiz Muhammad

Attested
Kausar Parveen

Gender: F Country of Stay: Pakistan

Identity Number: 2336979-2 Date of Birth: 18-04-1966

Date of Issue: 15-09-2020 Date of Expiry: 15-09-2030

Assistant District Education Officer (Female)
District Mohmand

Holder's Signature

2336979-2



Registrar General of Pakistan

101301207507
137-66-095744

گمشدہ کارڈ ملنے پر قریبی ایئر بس میں ڈال دیں

9

Annex - A/1

پاکستان

University of Peshawar (Pakistan)

Session ANNUAL 1999

KAUSAR PARVEEN

Son/Daughter of

HAJI GHULAM YASIN

and a student of/private candidate of

DISTRICT PESHAWAR

in the prescribed examination held in JANUARY, 2000

for the award of the Degree of
Master of Arts

in

Arabic

in

Second

Division

The Examination was taken as a whole/in parts.

Serial No. 0067942

Registration No. 93-PC-18928

Roll No. 2632

Examination held on 10th July, 2000



Attested
Lower

[Signature]
Registrar

Registrar

[Signature]
Registrar

10

Annex - A/2

University of Peshawar

(Urdu)

Session ANNUAL 1997

KAUSAR PERVEEN DAUGHTER of RAJ GILLAM YASIN and a student

of District Peshawar having passed the prescribed Examination held in December 1997 is this day admitted by the University of Peshawar to the Degree of

Bachelor of Education

In the Second Division in Theory
In the Second Division in Teaching Practice
In the Second Division in Aggregate

Passed also in Guidance & Counselling as an Optional Subject

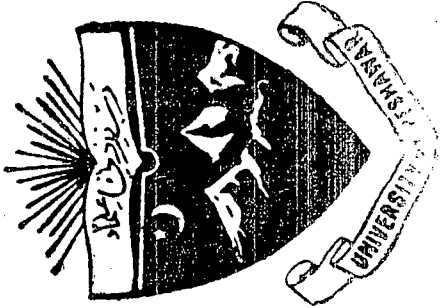
The Examination was taken as a whole ~~in parts~~

Serial No. 910743

Registration No. 93-PC-18928

Roll No. 542

Result declared on April 16, 1998



[Signature]
Registrar

Countersigned

[Signature]
Vice-Chancellor

[Signature]

[Signature]

Assistant District Magistrate
Officer (Female)
District Mohmand

(11)

Annex - A/3



UNIVERSITY OF PESHAWAR

BACHELOR OF EDUCATION EXAMINATION 1997 ANNUAL

Detailed Marks Certificate No 003728

Mr. / Ms. Kausar Perveen Roll No. 542

Divisions : (Theory II Practice of Teaching II Aggregate Second)

S U B J E C T S	M A R K S			
	MAXIMUM	O B T A I N E D		
		In Figures	In Words	
Educational Psychology	100	45	Forty five	
Principles of Education	100	54	Fifty four	
School Organisation and Health Education	100	47	Forty seven	
History of Education	100	50	Fifty	
Teaching of <u>English</u>	100	40	Forty	
Islamiyat / Islamic History	100	58	Sixty eight	
Elective <u>Urdu</u>	100	52	Fifty two	
Optional <u>Guid: Counselling</u>	100	62	Sixty two	
Practice of Teaching	200	90	Ninety	
Total		1000	508	Five hundred and eight

Errors & omissions are subject to subsequent rectification.

The Examination was taken as a WHOLE / ~~IN PARTS~~:

Result Declared on 16-4-98

Date of Issue 23/4/98

Controller of Examinations,
University of Peshawar,
Pakistan.

Attested

Kausar
Assistant District Education
Officer (Female)
District Mohmand

12

Annex - A/4



UNIVERSITY OF PESHAWAR
(Pakistan)

Detailed Marks Certificate
Master of Arts (FINAL)
in Urdu, Annual Examination, 1999

Private Candidate from Pesh-City

Required Pass Percentage - 45 Aggregate Pass Percentage - 45

Name: *Kausar Parveen*

Gender: *F*

Roll No. 26632

Father's Name: *Haji Ghulam Yasin*

Reg. No. 93-PC-13928

Papers	Maximum Marks	Marks Obtained	
		In Figures	In Words
Poetry " Nazam "	100	59	Fifty Nine
Qasida, Masnavi and Marsia	100	51	Fifty One
Iqbaliyat	100	42	Forty Two
Criticism	100	50	Fifty Only
Essay	100	55	Fifty Five
Viva Voce	100	40	Forty Only
M.A Previous Marks	500	241	Two Hundred and Forty One
<small>Errors and omissions are subject to subsequent rectification</small>	Total:	638	Five Hundred and Thirty Eight

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

Examination Held in January-February, 2000
Result Declared on July 10, 2000

Attested

Kausar

Controller of Examinations
University of Peshawar

001607

Assistant District Education
Officer (Female)
District Mohmand

13

Amx - A/5

DETAILED MARKS CERTIFICATE.

C.T EXAMINATION 1997. (CONDENCE COURSE) NEW.

ROLL NO. 1609

Name Kausar Parveen / Son / Daughter of Ghulam Jaseen.

S.NO	Subject	Max: Marks	Marks Obtained.	
			In Figure	In words
1.	Theory and Histry of Edu	50	32	/
2.	Method of Teaching and preparation of teaching aids	50.	21	
3.	Child Development.	50.	32	
4.	School and Commtys: Devlp:	50.	38	
5.	Org: of Elem: Edu: School Management.	50	37	
6.	English	50.	19	
7.	S: Studies/ Islamiat.	50.	42	
8.	Maths/ Science.	50.	37	
9.	Teaching Practice.	50	37	
Total:-		500	295	
Prepared by.				
Checked By.				
			Passed/Failed	
			Division. 8888 II	
			Result Declared on	25/12/97

- N.B. 1. Passed percentage 33% and aggregate 40 %
 2. Marks in circle not to be counted.
 3. Grade marks not to be included.
 4. A candidate may be considered unsuccessful in the subject comprising of theory and practical if he fails theory of the said subject.

Attested

Kausar

Assistant District Education Officer (Female) District Mohmand

Dy. Registrar, Departmental Examinations, Education Department NWFP, Peshawar.

OFFICE OF THE DIRECTOR OF EDUCATION FATA N.W.F.P PESHAWAR.

APPOINTMENT.

Miss: Kausar Parveen FA/UT D/O Haji Ghulam Yasim is hereby appointed against vacant CT Post at GHS Chaltanai Mohmand in B.P.S NO. 1 Rs, 570-74/10-640-370/P.E fixed Plus usual allowances as admitted under the rules, from the date of taking over-charge.

Terms/conditions.

1. Charge sheet should be submitted to all concerned in duplicate.
2. This appointment is being made purely on temporary basis and liable to termination at any time without any notice and with assigning any reason.
3. His original Educational qualification, date of birth and domicile certificate should be checked before he is handed over charge of the post and attested copy thereof be kept on the record of school.
4. He should sent to the Agency Surgeon concerned for medical exam the day on which he reports his arrival for duty and no pay should be drawn for him unless and until he produce his health and age certificate from the said surgeon.
5. His verification roll of character should be got completed and verified from the authorities concerned.
6. The pay scale and service rules would be subject to revision in accordance with the orders to be passed by the Govt of NWFP from time to time.
7. He should not be handed over charge of the post if he is below (18) or above (30) years of age, if he fail to resume charge within 15 days, his vacancy should be reported to this office ATONCE.

(HAJI RAFIQ MUSSAIN)
 DEPUTY DIRECTOR OF EDUCATION
 DIRECTORATE OF EDUCATION, FATA
 N.W.F.P PESHAWAR

Enclat: NO. 436-65-77/4-1/General SV/VLLAT. Dated the 9/10/1986

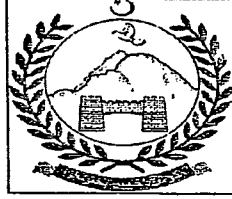
Copy forwarded for information and n/action to the:-

1. Agency Inspector of schools Mohmand Agency at Chaltanai.
2. Head Mistress GHS Chaltanai Mohmand Agency
3. Concisate concerned.
4. Personal File.

Haji Rafiq
 DEPUTY DIRECTOR OF EDUCATION
 DIRECTORATE OF EDUCATION, FATA
 N.W.F.P PESHAWAR.

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Annex — C



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Peshawar, dated the 24th July, 2014.

NOTIFICATION

No.SO(PE)4-5/SSRC/Meeting/2013/Teaching Cadre:- In pursuance of the provisions contained in sub rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department hereby directs that in this Department's Notifications No.SO(G)S&LD/1-28/2003/Vol-II dated, 09-04-2004, Notification No.SO(G)S&L/1-69/06/Vol-1/DPE/LIB dated, 13-11-2007, and Notification No.SO(PE) 4-5/SSRC/Meeting/2012/Teaching Cadre, dated, 13.11.2012, the following further amendments shall be made, namely:

AMENDMENTS

In the Appendix,-

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

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

				recruitment; and (b) fifty percent by initial recruitment.
1A	Director Physical Education (BPS-17)	At least second class Master's Degree in Physical Education from a recognized University.	22-35 years	(a) Fifty percent by promotion, on the basis of seniority-cum-fitness, from amongst Senior Physical Education Teachers (BPS-16), with at least five years service as Senior Physical Education Teacher and Physical Education Teacher and having qualification mentioned in column No. 3: Provided that if no suitable person is available from amongst Senior Physical Education Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst the Physical Education Teachers, with at least five years service as such and having qualification mentioned in column No. 3; Note:- If no suitable candidate is available in the relevant cadres of the above teachers ,the post falling in their promotion quota shall be filled by initial recruitment; and (b) fifty percent by initial recruitment"; and

(ii) against Serial No. 1B, as so renumbered, for the existing entries, the following shall be substituted, in respective columns, namely:

1	2	3	4	5
"1B.	Secondary School Teacher (BPS-16)	<p>I. At least second class Bachelor Degree's from a recognized University on need basis from the following groups with two subject</p> <p>(a) (Chemistry, Botany or Zoology),</p> <p style="text-align: center;">Or</p> <p>(b) (Physics, Maths "A" or "B" or Statistics)</p> <p style="text-align: center;">Or</p> <p>(c) (Humanities and other equivalent groups at degree level with English as compulsory subject;</p> <p style="text-align: center;">and</p> <p>II. Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A Education or equivalent qualifications from a recognized University.</p>	21 to 35 years.	<p>1. Seventy Five per cent by promotion, on the basis of seniority-cum-fitness, from the district concerned in the following manner:</p> <p>(a) forty per cent from amongst the Senior Certified Teachers (BPS-16), with at least five years service as Senior Certified Teacher and Certified Teacher and having qualification mentioned in column No.3:</p> <p style="padding-left: 40px;">Provided that if no suitable candidate is available from amongst Senior Certified Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers, with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(b) four per cent from amongst the Senior Drawing Masters(BPS-16), with at least five years service as Senior Drawing Masters and Drawing Masters and having qualification mentioned in column No.3:</p>

				<p><i>Provided that if no suitable candidate is available from amongst Senior Drawing Masters for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Drawing Masters with at least five years service as such and having qualification mentioned in column No. 3;</i></p> <p><i>(c) four per cent from amongst the Senior Arabic Teachers(BPS-16), with at least five years service as Senior Arabic Teachers and Arabic Teachers, and having qualification mentioned in column No.3:</i></p> <p><i>Provided that if no suitable candidate is available from amongst Senior Arabic Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from Arabic Teachers with at least five years service as such and having qualification mentioned in column No. 3;</i></p> <p><i>(d) four per cent from amongst the Senior Theology Teachers(BPS-16), with at least five years service as Senior Theology Teachers and Theology Teachers and having qualification mentioned in column No.3:</i></p>
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				<p><i>Provided that if no suitable candidate is available from amongst Senior Theology Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Theology Teachers with at least five years service as such and having qualification mentioned in column No. 3;</i></p> <p><i>(e) three per cent from amongst the Senior Qaris (BPS-16), with at least five years service as Senior Qari and Qari and having qualification mentioned in column No.3:</i></p> <p><i>Provided that if no suitable candidate is available from amongst the Senior Qaris then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from Qaris with at least five years service as such and having qualification mentioned in column No. 3;</i></p> <p><i>(f) twenty per cent from amongst the Primary School Head Teachers (BPS-16), with at least seven years service as Primary School Head Teachers and Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No. 3:</i></p> <p><i>Provided that if no suitable candidate is available from amongst</i></p>
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			<p><i>Primary School Head Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least seven years service as Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No.3:</i></p> <p><i>Provided further that if no suitable candidate is available from amongst Senior Primary School Teachers for promotion then the post shall be filled from amongst Primary School Teachers with at least seven years service as such and having qualification mentioned in column No. 3; and</i></p> <p><i>(ii) twenty Five percent by initial recruitment.</i></p> <p>Note:</p> <p><i>I. If no suitable candidate is available in the relevant cadre of the above teachers, the post falling in their promotion quota shall be filled by initial recruitment.</i></p> <p><i>II. Posts of General SST and SSTs-1 Science and SST-2 Science shall be filled by promotion or initial recruitment, each on need basis separately.”.</i></p>
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21

**SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**

Endst : of even No & date:

1. *The Secretary to Government of Khyber Pakhtunkhwa, Establishment and Administration Department Peshawar.*
2. *The Secretary to Government of Khyber Pakhtunkhwa, Finance Department Peshawar.*
3. *The Secretary to Government of Khyber Pakhtunkhwa, Law Department Peshawar*
4. *The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.*
5. *The Accountant General Khyber Pakhtunkhwa Peshawar.*
6. *The Director, Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.*
7. *The Director of Education (FATA) Peshawar.*
8. *The Director, Curriculum and Teacher Education Khyber Pakhtunkhwa Abbottabad.*
9. *The Director, (PITE) Khyber Pakhtunkhwa Peshawar.*
10. *The Director, ESRU Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.*
11. *Manager Government Printing Press Khyber Pakhtunkhwa Peshawar.*
12. *The Deputy Director, EMIS (S&SE) Department Khyber Pakhtunkhwa Peshawar.*
13. *All District Education Officer (M&F) in Khyber Pakhtunkhwa.*
14. *All District Account Officer in Khyber Pakhtunkhwa.*
15. *All Agency Education Officer in FATA*
16. *All Agency Account Officer in FATA.*
17. *PS to Governor Khyber Pakhtunkhwa. Peshawar.*
18. *PS to Chief Minister Khyber Pakhtunkhwa. Peshawar.*
19. *PS to Chief Secretary Khyber Pakhtunkhwa. Peshawar.*
20. *PS to Minister E&SE Khyber Pakhtunkhwa. Peshawar.*
21. *PS to Secretary E&SE Khyber Pakhtunkhwa. Peshawar.*
22. *Master file*

**(ZAMIN KHAN MOMAND)
SECTION OFFICER (PRIMARY)**

(22)

Amx - D

Directorate of Elementary & Secy: Education
Khyber Pakhtunkhwa, Peshawar.

No. 4954/F.No. SST Promotion to SS Posts
Dated Peshawar the 7/8 2014

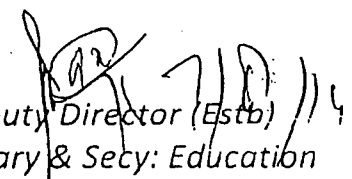
To

The Director of Education (FATA),
FATA Secretariat Warsak Road, Peshawar.

Subject: - DEPARTMENTAL PROMOTION FROM SCTS/CT/SDM/DM/ SAT/
AT/STT/TT & S, QARIES/QARIES TO THE POST OF SSTS (BS-16
REGULAR. ^{SPT/PSI}

Memo:


In continuation of this Directorate letter No. 4874 dated 06-08-2014 on the subject cited above and to request you to fill the vacant posts of SST (General/Science) in Government Higher Secondary/High & Middle Schools (M&F) FATA by promotion of in-service teachers under the existing rules already conveyed to you under the above cited letter number and date under intimation to all concerned.



Deputy Director (Estb)
Elementary & Secy: Education
Khyber Pakhtunkhwa

Endst: No. _____

Copy of the above is forwarded for information to:-

1. PS to Minister for E&SE Khyber Pakhtunkhwa.
2. PS to Secretary to Govt. of Khyber Pakhtunkhwa, E&SE Department.
3. PA to Director (E&SE) Khyber Pakhtunkhwa, Peshawar.


Attested


Deputy Director (Estb)
Elementary & Secy: Education
Khyber Pakhtunkhwa



**DISTRICT EDUCATION OFFICER
MALI CHARSAKDA**

Notification

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification, No.50 (PE)/4-5/SSRC/Meeting/2013/Teaching Cadre dated 24th July 2014 and Notification No 3376-80/File No.2/Promotion SST B-10: Dated Peshawar the 28-10-2014 issued by the Director Elementary and Secondary Education, Khyber Pakhtunkhwa Peshawar, the following SCTs/CTs, SDMs/DMs, SATs/ATs, STTs/PTs, Senior Qaris/Qaris, PSITs/ SPSTs are hereby promoted to the post of SST (Bio-Chem), SST (Phy-Maths), SST (General) noted against each BPS-16 (Rs.10000-800-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and conditions given below with immediate effect and further posted in the Schools noted against each:-

A. SST (Bio-Chem)

S.No	Name of Teacher & Designation	Present Place of Posting	Place of Posting
15	Mazhar - Ul-Islam (SCT)	GHS Utmanzar	GHS Utmanzar No 2
93	Riasat Ali (SCT)	GHS Zurbah Garhi	GHS Sherpao
112	Iftikhar Ahmad (SCT)	GHS Rajar No 1	GHS Nisatta
183	Jamshaid Khan (SCT)	GHS Zurbah Garhi	GHS Gulkotab Koroonia
190	Maqsood Jan (CT)	GHS Utmanzar	GHS Turangzar
237	Hayat Jan (CT)	GHS Utmanzar No 2	GHS Tarnan
245	Inayat Ur Rehman (CT)	GHS Utmanzar	GHS Utmanzar
282	Nasrullah Khan (CT)	GMS Dhakki	GHS Hajizai
323	Jamshaid Khan (CT)	GHS Abazar	GHS Tangi No.2
341	Idrees Khan (CT)	GMS Dab Banda	GHS Charsakda Khass
360	Muhammad Said (CT)	GHS Rahmatullah	GHS Shara Shabqadar
1087	Abdallah Jan (SPST)	GPS Munshiano Killi	GHS Halim zai
1454	Tariq Hussain (SPST)	GPS Haryana, No. 1	GHS Doshera
1454	Muhammad Akram (SPST)	GPS Inam Killi	GHS Mera Gul Abad
1474	Taj Ullah (SPST)	GHS Shakoor	GHS Mardhand
153	Zakarullah Jan (SPST)	GPS Hajizai	GHS Katozai
1534	Arab Jan (SPST)	GPS Baz Mian Killi	GHS Kangra
103	Shehriyar (DM)	GHS Safi Abad	GHS Khat Killi

B. SST (Phy-Maths)

Attested

S.No	Name of Teacher & Designation	Present Place of Posting	Place of Posting
72	Mahboob Ul Hassan (SC)	GHS Rahmat Ullah Khan Koroonia	GHS Rahmat Ullah Khan Koroonia
120	Fazli Wahab (SCT)	GHS Soor Kamal	GHS Mardhand
139	Nawab (SCT)	GMS Mufti Abad, GHS Muhammad Nari	GHS Wardaga
140	Shakir Ullah (SCT)	GHS Chari Hamid Gul	GHS Geedar
141	Habib Ur Rehman (SCT)	GHS Chari Hamid Gul	GHS Parang

6	142	Imtiaz Ali (SCT)	GHS Ghari Hamid Gul	GHS Rajjar No.1
7	171	Masai Khan (SCT)	GHS Dargai Manga	GHS Dargai Manga
8	180	Syed Sabaz Ali (SCT)	GHS Dhakki	GHS Ghazgi
9	210	Basharat Ahmad (SCT)	GHS Charsadda No.1	GHS Shakardhand
10	225	Ijaz Ali Khan (CT)	GHS Harichand	GHS Mirzadher
11	259	Sajid Ali Shah (CT)	GMS Marchaki Rajjar	GHS Turangzai
12	266	Khial Badshah (CT)	GHS Tangi No.2	GHS Abazai
13	330	Shakir Rehman (CT)	GHS Charsadda No.1	GHS Rajjar No.2
14	347	Sareer Ahmad (CT)	GHS Sherpao	GHS Gandheri
15	352	Zahid Shah (CT)	GHS Shodag	GHS Kharaki
16	282	Shahid Jamal (SPST)	GPS Dosehra	GHS Turlandi
17	907	Salar Fathuddin (SPST)	GPS Marozai	GHS Khwaja Hawas
18	1076	Irshad Ali (SPST)	GPS Ziam	GHS Mani Khela
19	1089	Siraj Ahmad (SPST)	GPS Shahdhand	GHS Mirzai
20	1090	Aftab Hussain (SPST)	GPS Umarzai No.2	GHS Gul Khitab Koroona Umerzai
21	1167	Samin Gul (SPST)	GPS Angar Koroona	GHS Behlola
22	1168	Sajid Ali (SPST)	GPS Rajjar No.2	GHS Zahid Abad
23	84	Muhammad Younas (DM)	GHS Umarzai	GHS Khuladhand
24	113	Kamran (DM)	GHS Hajizai	GHS Soro Killi
25	97	Aleem Ullah (AT)	GHS Hajizai	GHS Shara
26	81	Akram Khan (TT)	GHS Sherpao	GHS Zarab Ghari
27	42	Asmat Ali (SQari)	GCMHS Turangzai	GHS Cheena

C.SST (General)

Attested

S.No	Name of Teacher & Designation	Present Place of Posting	Place of Posting
1	9 Muhammad Ishaq (SCT)	GHS Mera Gul Abad	GHS Mera Gul Abad
2	12 Muhammad Afzal (SCT)	GHS Cheena	GHS Rajjar - 1
3	13 Inam Ullah (SCT)	GHS Sherpao	GHS Turangzai
4	14 Darus Salam (SCT)	GHS Ambadher	GHS SKF Dalazak
5	16 Sultan Shah (SCT)	GHS Shakardhand	GHS Shakardhand
6	20 Muhammad Iqbal (SCT)	GHS Kangra	GHS Katozai
7	22 Kifayat Ullah (SCT)	GCMHS Turangzai	GHS Rajjar - 1
8	27 Waqid Ali (SCT)	GMS Dheri Ghazgi/ GCMHS Turangzai	GHS Ghazgi
9	28 Zarid Ullah (SCT)	GHS Shakardhand	GHS Dargai Manga
10	33 Muhammad Islam (SCT)	GHS Mani Khela	GHS Mani Khela
11	34 Abdur Basir (SCT)	GMS Sherpao	GHS Gul Abad Tangi
12	37 Muhammad Saeed Khan (SCT)	GHS Mirzadher	GHS Tarnab
13	45 Muhammad Israr (SCT)	GMS Islamabad No.2	GHS Doshera
14	47 Muhammad Qasim Jan (SCT)	GHS Charsadda No.1	GHS Nisatta
15	48 Maz Ullah Khan (SCT)	GMS Zarin Abad	GMS Zarinabad
16	49 Niamat Ullah (SCT)	GMS Nawan Killi	GMS Kot
17	51 Nizar Ud Din (SCT)	GHS Parang	GHS Rajjar - 2
18	40 Pervez Shah (PSHT)	GPS Sheikh Kili	GHS Nisatta
19	69 Zahir Ullah (PSHT)	GPS Khuladhand	GHS Babara

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20	121	Atta Ur Rahman (PSHT)	GPS Bosa Khel No.1	GHSS No.1 Charsadda
21	168	Halim Khan (PSHT)	GPS Bachayano Killi	GHS Abazai
22	169	Ali Muhammad (PSHT)	GPS Qalaray	GHSS Doshera
23	186	Muhammad Rafi (PSHT)	GPS Dagt Faizullah Khan	GHS Dheri Sikandar Khan
24	190	Waheed Ullah (PSHT)	GPS Shabqadar Fort No.2	GHS Dheri Sikandar Khan
25	276	Hanif Ullah (PSHT)	GPS Bakayana	GHS Ambadher
26	14	Yaqoob Jan (SDM)	GHS Utmanzai No.2	GHSS Utmanzai
27	9	Wajid Ullah Jan (STT)	GHS Rashaki	GHS Rashaki
28	43	Irfan Ullah (STT)	GHS Charsadda Khas	GHS Geedar
30	02	Muhammad Nasrul Qaddus (TT)	GHS Soor Vamar	GHS Mardhand
31	24	Muhammad Tayyab (TT)	GHS Soro Killi	GHS Soro Killi
32	10	Qari Mohsin Ullah (SQari)	GHS Tangi No.2	GHS Sadar Chari

Terms and Conditions:-

1. They would be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be preceded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their Inter-Se Seniority on lower post will remain intact.
6. No TA/DA is allowed for joining his duty.
7. They will give an undertaking to be recorded in their service book to the effect that if any over payment made to them in light of this order, will be recovered and if they are wrongly promoted, they will be reversed.
8. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
9. Their posting will be made on School Based, they will have to serve at the place of posting, and the service is not transferrable to any other station.
10. Before handing over charge once again their documents may be checked if they have not the required relevant qualification as per rules, they may not be handed over charge of the post.
11. Their BA/BSc and B.Ed degrees and DMCs will be verified by the concerned DDO.

Attested

(Siraj Muhammad)
District Education Officer
Male Charsadda

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

Copy forwarded for information and necessary action to the:-

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

District Education Office
Male Charsadda

26

Annex - "F"
Annex - "F"



Jahangir

FATA SECRETARIAT
DIRECTORATE OF EDUCATION

KPK, WARSAK ROAD PESHAWAR, PAKISTAN

NO. 2587-2601
DATED 9-3-15
E-6 UP GRADATION

MOST IMMEDIATE.

To All the Agency Education Officers
In FATA.

Subject. DEPARTMENTAL PROMOTION FROM THE POST OF SCTS/CT/SDM/DM/SAT/AT/STT/TT&S, QARIESQARIES TO THE POST OF SSTS (BS-16) Regular.

Memo;
I am directed to enclose herewith the Deputy Director (Estab) Elementary & Secondary Education Khyber Pakhtunkhwa letter No.4954/F.No.SST promotion to SST posts dated 7/8/2014 alongwith criteria on the above noted subject.

Keeping in view the criteria, kindly prepare category wise list (Male/Female) as per below proforma alongwith photo copies of documents of the candidate for promotion against the post of SST for onward submission to the quarter concerned please.

S.No	Name of Teachers	Name of School	Desig;	BPS.	Academic Qualification	Professional Qualification	Date of Ist Apptt; on present post.	Domicile

Sd/

Deputy Directress (Estab)

Endst;No. 2602-3 / Dated 9-3-2015.

Copy to;

1. Deputy Director (Estab) Elementary & Secondary Khyber Pakhtunkhwa w/r to his letter mentioned above and telephonic discussion with Supdt; (Estab) E&SE Khyber Pakhtunkhwa that the information as per proforma may be checked & necessary guidance may be intimated if any please.
2. P.A to Director Education FATA.

[Signature]

[Signature]

Deputy Directress (Estab)

Attched

[Initials]

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Ann x - "G"

SST (F) Mohmand Agency



FATA SECRETARIAT
DIRECTORATE OF EDUCATION
KHYBER PAKHTUNKHWA, WARSAK ROAD PESHAWAR, PAKISTAN
PHONE. 091-9210166 FAX 091-9210216

No. _____ Date ____/____/2017

Notification

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

B. SST (Phy-Maths)

1. PROMOTION OF SCT/CT TO SST (Mph/Maths) BPS-16.

Total No. of SST vacant post of SST (Phy-Maths)	02
25% share initial recruitment	0
75% share for Promotion.	02
40 % Share of promotion of Senior CT/CTs	01
Posts available for promotion	02
Promoted through this order	01

S.N o.	Sl:No o.	Name of Officials	Place of posting	D/O Birth	Date of Appott; regular CT	Qualification	Remarks
1	54	Khalida safi	GGHS Ato khel	5/3/1971	29/3/2007	BSc/B.Ed	Services placed at the disposal of A Mohmand Agency for further posting against SST Phy/Math (BPS-16) post

C. SST (General)

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

Total No. of SST General (M) Posts vacant Posts	06
25% share initial recruitment	02
75% share for Promotion.	04
40 % Share of promotion of Sr; CT/CT	02
Posts available for promotion	02
Promoted through this order	02

S. No.	S.L No	Name of Official	Place of Posting	Date of Birth.	Date of Appott: as Regular CT	Qualification	Remarks
1	1	Gul Rukh Yousaf	GGHS Subhan Khwar	1/4/1964	25/12/1993	BA/B.Ed	Services placed at the disposal of / Mohmand Agency for further post against SST General (BPS-16) post.
2	2	Kausar Parveen	GGHSS Ghallanal	10/4/1966	25/12/1993	BA/B.Ed	Services placed at the disposal of / Mohmand Agency for further post against SST General (BPS-16) post.

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

Total No. of SST General (M) Posts vacant Posts	06
25% share initial recruitment	02
75% share for Promotion.	04
20 % Share of promotion of PSHT/SPST/PST	01
Posts available for promotion	01
Promoted through this order	01

S.N o.	Sl:No o.	Name of Official	Place of posting	D/O Birth	Date of Appott; regular PST	Qualification	Remarks
1	2	Gulzar Tabbasum	GGPS Ato khel	16/3/1969	22/11/1992	BA/B.Ed	Services placed at the disposal of AE Mohmand Agency for further posting against SST General (BPS-16) post.

Attested
[Signature]

27-A

3. PROMOTION OF SDM/DM TO SST (General) BPS-

Total No. of SST General (M) Posts vacant Posts	06
25% share initial recruitment	02
75% share for Promotion.	04
4 % Share of promotion of SDM/DM	01
Posts available for promotion	01
Promoted through this order	01

S. No	S.L No	Name of Official	Place of Posting	Date of Birth	Date of Appott: as Regular DM	Qualifi-cation	Remarks
1	2	Imrana shaheen	GGHS Dab kor	27/11/1965	13/5/1997	BA/B.Ed	Services placed at the disposal of AF Mohmand Agency for further postti against SST General (BPS-16) post.

Terms and conditions:-

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


(Hashim Khan)
Director Education FATA

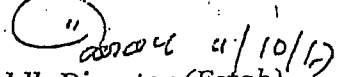
Endst: No. 15751-870

Dated Peshawar the 11/10/2017

Copy forwarded for information and necessary action to the: -

1. Accountant General (PR) Sub Office, Peshawar.
2. Director E&SE Khyber Pakhtunkhwa, Peshawar.
3. Agency Education Officer Mohmand Agency.
4. Agency Accounts Officer Mohmand Agency.
5. PS to ACS FATA.
6. PS to the Secretary SSD, FATA Secretariat, Peshawar.
7. PS to the Secretary Finance Department FATA Secretariat Peshawar.
8. PA to Director Education, FATA.
9. Promotees Concerned.
10. M/File.

Attested 


Add: Director (Estab)
Directorate of Education, FATA

(28)

Govt

Annex - H

GOVERNMENT OF THE KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

NOTIFICATION

Peshawar, dated the November 13, 2012.

No. SO/PE/14-5/SSRC/Meeting/2012/Teaching Cadres:- In pursuance of the provisions contained in sub rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 and in supersession of all Notifications issued in this behalf, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department hereby lays down the method of recruitment qualification and other conditions specified in the Appendix to this Notification which shall be applicable to all the posts specified in Column No. 2 of the said Appendix and the schedule therewith.

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

Encl: No. & Date as above.

Copy forwarded to:-

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

Attested

مجلس خاندانی و
وزیر اعلیٰ پروگرام پیکر ایسوسی ایشن (APTA)
شماره پیکر ٹیٹون خوا. 03159159555
پشاور 4 پی ایس ڈی

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9. The Director Curriculum & Teachers Education Abbottabad.
9. The Director (PITE) Khyber Pakhtunkhwa Peshawar.
10. The Director ESRU, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
11. The Deputy Director Database(EMIS) E&SE Department.
12. All District Coordination Officers in Khyber Pakhtunkhwa.
13. All Executive District Officers Elementary & Secondary Education in Khyber Pakhtunkhwa.
14. All District Accounts Officers in Khyber Pakhtunkhwa /Agency Accounts Officers FATA.
15. All Agency Education Officers FATA.
16. P.S to Governor, Khyber Pakhtunkhwa.
17. P.S to Chief Minister, Khyber Pakhtunkhwa.
18. P.S to Chief Secretary, Khyber Pakhtunkhwa.
19. PS to Minister E&SE Khyber Pakhtunkhwa Peshawar.
20. PS to Secretary E&SE Department.
21. Master File.

R/S

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Section Officer (Primary)

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APPENDIX

S.No.	Nomenclature of the post.	Minimum qualification and experience for initial appointment or by transfer.	Age limit.	Method of recruitment.
1.	2.	3.	4.	5.
1.	Secondary School Teacher (BPS-16).	(i) Second class Bachelor's Degree with two subjects as Chemistry, Botany, Zoology, Physics, Mathematics, Statistics, Humanities and other equivalent groups from a recognized University; or (ii) M.A in Education or Bachelor's Degree in Education, from a recognized University.	18 to 35 years.	(a) Fifty percent by promotion on the basis of seniority-cum-fitness, in the following manner: (i) forty per cent from amongst the Certified Teachers (General), Certified Teachers (Agriculture), Certified Teachers (Industrial Arts) and Certified Teachers (Home Economics) with at least five years service as such and having qualification mentioned in column No. 3; (ii) four per cent from amongst the Drawing Masters with at least five years service as such and having qualification mentioned in column No.3; (iii) four per cent from amongst the Physical Education Teachers with at least five years service as such and having qualification mentioned in column No. 3:

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40%
CT

4%
DM

4%
PET

23

31

			<p>(iv) one per cent from amongst Instructional Material Specialists with atleast five years service such and having qualification mentioned in column No. 3; and</p> <p>(v) one per cent from amongst Arabic Teachers with at least five years service as such and having qualification mentioned in Column No.3; and</p> <p>(b) fifty per cent by initial recruitment.</p>	1%
2.	Senior Arabic Teacher (SAT) (BPS-16)		By promotion, on the basis of seniority-cum fitness, from amongst Arabic Teachers, with least five years service as such and having qualification as prescribed for initial recruitment of Arabic Teacher.	1% AT
3.	Senior Theology Teacher (STT) (B-16).		By promotion, on the basis of seniority-cum fitness, from amongst Theology Teachers, with at least five years service as such and having qualification as prescribed for initial recruitment of Theology Teacher.	50% Init- Pro
4.	Senior Certified Teacher (SCT)(General) (BPS-16).		By promotion, on the basis of seniority-cum fitness, from amongst Certified Teachers (General), with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (General).	

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	Senior Certified Teacher (Industrial Arts) (BPS-16).		By promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers (Industrial Arts), with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (Industrial Arts).
6.	Senior Certified Teacher (Agriculture) (BPS-16).		By promotion, on the basis of seniority-cum-fitness, from amongst Certified Teacher (Agriculture), with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (Agriculture).
7.	Senior Drawing Master (BPS-16).		By promotion on the basis of seniority-cum-fitness from amongst Drawing Masters, with at least five years service as such and having qualification as prescribed for initial recruitment of Drawing Master.
8.	Senior Certified Teacher (SCT) (Home Economics) (BPS-16).		By promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers (Home Economics), with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (Home Economics).
9.	Senior Physical Education Teacher (BPS-16).		By promotion, on the basis of seniority-cum-fitness, from amongst Physical Education Teachers, with at least five years service as such and having qualification as prescribed for initial recruitment of Physical Education Teacher.

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<p>Arabic Teacher (AT) (BPS-15)</p>	<p>(i) Second Class Secondary School Certificate, from a recognized Board with Shahdatul Alamia Fil Uloomul Arabia wal Islamia from a recognized Tanzimuatul Wafaqul Madaris: or Darul Uloom Saidu Sharif Swat, Darul Uloom Charbagh Swat, Darul Uloom Chitral, Darul Uloom Darosh Chitral and any other Government run Darul Uloom, as notified by the Government from time to time; or (ii) Second Class Master's Degree in Arabic from a recognized University.</p>	<p>20 to 35 years.</p>	<p>By initial recruitment</p>
<p>11. ✓ Theology Teacher (TT) (BPS-15).</p>	<p>(i) Second Class Secondary School Certificate, from a recognized Board with Shahdatul Alamia from a recognized Tanzimatul Wafaqul Madaris. or Darul Uloom Saidu Sharif Swat, Darul Uloom Charbagh Swat, Darul Uloom Chitral, Darul Uloom Darosh Chitral and any other Government run Darul Uloom, as notified by the Government from time to time; or (ii) Second Class Master's Degree in Islamiyat from a recognized University.</p>	<p>20 to 35 years.</p>	<p>(a) Seventy-five per cent by initial recruitment; and (b) twenty-five per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Senior Qaris, with at least five years service and having qualification prescribed for initial recruitment of Theology Teacher: <u>Note:</u> In case of non availability of suitable person for promotion, then by initial recruitment.</p>
<p>12. Senior Qari (BPS -15).</p>			<p>By promotion, on the basis of seniority-cum-fitness, from amongst Qaris, with at least five years service as such and having qualification prescribed for initial recruitment.</p>
<p>13. Certified Teacher (General) (BPS-15).</p>	<p>Bachelor's Degree or equivalent qualification from a recognized University with Certified Teacher</p>	<p>18 to 35 years.</p>	<p>(a) Forty per cent by initial recruitment; and</p>

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		<p>Certificate or two years Associate Degree in Education from a recognized University or eighteen months Diploma in Education.</p>		<p>(b) sixty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (General):</p> <p>Provided that if no suitable candidate is available amongst the Primary School Head Teachers for transfer, then the posts will be filled by promotion on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five year service and having qualification prescribed for initial recruitment of Certified Teacher (General).</p> <p><u>Note:</u> In case of non availability of suitable person for promotion, then by initial recruitment.</p>
14.	<p>Certified Teacher (Industrial Arts) (BPS-15).</p>	<p>(i) Bachelor's Degree from a recognized University with two years training in the relevant technical subjects from any Government Industrial or Govt. Technical Vocational Institute or Center; or</p> <p>(b) Bachelor's Degree from a recognized</p>	<p>18 to 35 years.</p>	<p>(a) Forty per cent by initial recruitment; and</p> <p>(b) sixty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher</p>

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	University with nine months training from any Government Agro Technical Teacher Training Center of the Level of Certified Teacher, Agro technical (Industrial Arts).		(Industrial Arts): Provided that if no suitable candidate is available amongst the Primary School Head Teachers for Promotion, then the posts will be filled by promotion on the basis of seniority cum- fitness, from amongst Senior Primary School Teachers with at least five years service and, having qualification prescribed for initial recruitment of Certified Teachers (Industrial Arts).	
15.	Certified Teacher (Agriculture) (BPS-15).	<ul style="list-style-type: none"> (i) Bachelor's Degree from a recognized University with one year training in Agriculture from any Government institute or center with nine months training from Government Agro Technical Teacher Training Center of the level of Certified Teacher Agro Technical (Agriculture); or (ii) Bachelor's Degree with Agriculture as one of the subject, from a recognized University; or (iii) Bachelor's Degree from a recognized 	18 to 35 years.	<p><u>Note:</u> In case of non availability of suitable person for promotion, then by initial recruitment..</p> <ul style="list-style-type: none"> (a) Forty per cent by Initial recruitment; and (b) sixty per cent by promotion, on the basis of seniority-cum-fitness from amongst the Primary School Head Teachers, with at least five years service and having qualification prescribed for initial recruitment of Certified Teachers (Agriculture): <p>Provided that if no suitable candidate is available amongst the</p>

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any Government Training Center of the Level of Certified Teacher, Agro technical (Agriculture).

promotion on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (Agriculture).

Note: In case of non availability of suitable person for promotion, then by initial recruitment.

16. Certified Teacher (Home Economics) (BPS-15).

- (i) Bachelor's Degree with Home Economics, as one of the subject, from a recognized University with in service training from Government Agro Technical Teacher Training Center; or
- (ii) Certified Teacher Certificate with Home Economics, as one of the subjects, from any Government Training school or college with Bachelor's Degree; or
- (iii) Bachelor's Degree from a recognized University with nine months training from Government Agro Technical Teacher Training Center of the level of the Certified Teacher Agro Technical (Home Economics); or
- (iv) Bachelor's Degree, from a recognized

18 to 35 years.

- (a) Forty per cent by Initial recruitment; and
- (b) sixty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service as such and having qualification prescribed for initial recruitment of Certified Teacher (Home Economics):

Provided that if no suitable candidate is available amongst the Primary School Head Teachers for promotion, then the posts will be filled by promotion on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment o

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		University with one year vocational training from any Government training center or institute with nine months training from Government Agro Technical Teacher Training center of the level of certified Teacher Agro Technical (Home Economics).		Certified Teacher (Home Economics). <u>Note:</u> In case of non availability of suitable person for promotion, then by initial recruitment.
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17.	Drawing Master (BPS-15).	Bachelor's Degree from a recognized University with one year Drawing Master (DM) course Certificate.	18 to 35 years.	<p>(a) Eighty per cent by initial recruitment; and</p> <p>(b) twenty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed for initial recruitment of Drawing Master.</p> <p>Provided that if no suitable candidate is available for promotion then on the basis of seniority-cum-fitness from Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Drawing Master.</p> <p><u>Note:</u> In case of non-availability of suitable candidate for promotion, then by initial recruitment.</p>
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<p>18. Physical Education Teacher (BPS-15).</p>	<p>Bachelor's Degree from a recognized University with one year junior Diploma in Physical Education course or Army equivalency or other equivalent qualification.</p>	<p>18 to 35 years.</p>	<p>(a) Eighty per cent by initial recruitment; ar (b) twenty per cent by promotion, on tl basis of seniority-cum-fitness, fro amongst the Primary School He Teachers with at least five years servi and having qualification prescribed f initial recruitment of Physical Educatio Teacher.</p> <p>Provided that if no suitab candidate is available for promotion on the basis of seniority-cum-fines from amongst Senior Primary Scho Teachers with at least five years servi and having qualification prescribed f initial recruitment of Physical Educatio Teacher.</p> <p>Note: In case of non-availability of suitab candidate for promotion, then by initi recruitment.</p>
<p>19. Primary School Head Teacher (PSHT) (BPS-15).</p>			<p>By promotion, on the basis of seniority-cum-fitness, from amongst Senior Primary Scho Teachers with at least ten years service ar having qualification prescribed for initi recruitment of Primary School Teacher.</p>
<p>20. Senior Primary School Teacher (BPS-14).</p>			<p>By promotion, on the basis of seniority-cum-fitness, from amongst Primary School Teache</p>

عاصم علی شاہ

مکمل سین (16) نومبر 2018ء
 بی۔ اے۔ ایف۔ ایف۔ ڈی۔ نزد ایس۔ ٹی۔ ک۔ ہوا
 با عقل اسٹوڈنٹس نزد شاہ سوئیٹس
 سہیل

اپنا شیور، فضل کور، عام اجناس - اسٹال منڈی - سی۔ اے۔ ایف۔ ایف۔ ڈی۔
 03323000425
 اسرار اللہ پٹیل - گلبرگ - سی۔ اے۔ ایف۔ ایف۔ ڈی۔
 نیریس ریلوے - شاہد رضا - سی۔ اے۔ ایف۔ ایف۔ ڈی۔
 فوار اطراف میوزیم

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				with at least five years service as such : having qualification prescribed for ini recruitment of Primary School Teacher.
21.	Primary School Teacher (BPS-12).	(i) Intermediate or equivalent qualification, from a recognized Board with Primary School Teacher Certificate/ Diploma in Education from a recognized Institute; or (ii) Secondary School Certificate, from a recognized Board in second Division with two years Associate Degree in Education from a recognized University.	18 to 35 years.	By initial recruitment on merit at Union Coun level: provided that if no suitable candidate within the Union Council is available, then fr the adjacent Union Councils on merit.
22.	Qari (BPS-12).	Intermediate with Hifz-e-Quran and Qirat Sanad from a recognized Institution.	18 to 35 years.	By initial recruitment.

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SCHEDULE

Selection criterion and other conditions for direct recruitment against the below mentioned posts shall be as un

Arabic Teacher

Educational Qualification	Total Marks: 100
SSC	Marks obtained X 20 / total marks = _____
HSSC	Marks obtained X 20 / total marks = _____
B.A/BSc	Marks obtained X 20 / total marks = _____
M.A Arabic / Shahadatul Alamia Fil Uloomul Arabia wal Islamia from a recognized Tanzimuatul Wafaqul Madaris	Marks obtained X 20 / total marks = _____
Other MA/MSc/M.Ed / MA Edu	Marks obtained X 15 / total marks = _____
MPhil/PhD	Marks = 05

Theology Teacher

Category of Qualification	Total Marks 100
SSC	Marks obtained X 20 / total marks = _____
HSSC	Marks obtained X 20 / total marks = _____
B.A/BSc	Marks obtained X 20 / total marks = _____
M.A/MSc/M.Ed / MA Edu	Marks obtained X 20 / total marks = _____
M.A Islamiat / Shahadatul Alamia Fil Uloomul Arabia wal Islamia from a recognized Tanzimuatul Wafaqul Madaris	Marks obtained X 15 / total marks = _____
MPhil/PhD	Marks = 05

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Qari/Qaria

Category of Qualification	Total Marks 100
SSC	Marks obtained X 20 / total marks = _____
Qurt Sanad from a recognized Institution.	Marks obtained X 20 / total marks = _____
HSSC	Marks obtained X 20 / total marks = _____
BA/BSc	Marks obtained X 20 / total marks = _____
MA/MSc/ M.Ed / MA Edu	Marks obtained X 15 / total marks = _____
MPhil/PhD	Marks = 05

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Certified Teacher
(General, Industrial Arts, Agriculture, Home Economics)

Category of Qualification	Total Marks 100 For Humanities group at Intermediate/Graduation Level	For Candidate of Science group
SSC	Marks obtained X 20 / total marks = _____	5 Extra marks for F.Sc. 5 Extra marks for B.Sc and 5 Extra marks for M.Sc will be added to the total score obtained by a candidate during his selection.
HSSC	Marks obtained X 20 / total marks = _____	
BA/BSc	Marks obtained X 20 / total marks = _____	
CT Certificate/ Diploma in Education /ADE.	Marks obtained X 20 / total marks = _____	
MA/MSc/M.Ed / MA Edu	Marks obtained X 15 / total marks = _____	
MPhil/PhD	Marks = 05	

Attached

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Drawing Master

Category of Qualification	Total Marks 100	For Candidate of Science group
SSC	Marks obtained X 20 / total marks = _____	5 Extra marks for F.Sc. 5 Extra marks for B.Sc and 5 Extra marks for M.Sc will be added to the total score obtained by a candidate during his selection
HSSC	Marks obtained X 20 / total marks = _____	
BA/BSc	Marks obtained X 20 / total marks = _____	
DM Certificate	Marks obtained X 20 / total marks = _____	
MA/MSc/M.Ed / MA Edu	Marks obtained X 15 / total marks = _____	
MPhil/PhD	Marks = 05	

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Physical Education Teacher

Category of Qualification	Total Marks 100	For Candidate of Science group
SSC	Marks obtained X 20 / total marks = _____	5 Extra marks for F.Sc. 5 Extra marks for B.Sc and 5 Extra marks for M.Sc will be added to the total score obtained by a candidate during his selection.
HSSC	Marks obtained X 20 / total marks = _____	
BA/BSc	Marks obtained X 20 / total marks = _____	
JDPE or Equivalent Certificate	Marks obtained X 20 / total marks = _____	
MA/MSc/M.Ed / MA Edu	Marks obtained X 15 / total marks = _____	
MPhil/PhD	Marks = 05	

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Primary School Teacher

Category of Qualification	Total Marks 100 For Humanities group at Intermediate Level	For Candidate of Science group
SSC	Marks obtained X 20 / total marks = ____	5 Extra marks for F.Sc. 5 Extra marks for B.Sc and 5 Extra marks for M.Sc will be added to the total score obtained by a candidate during his selection
HSSC	Marks obtained X 10 / total marks = ____	
B.A/B.Sc	Marks obtained X 25 / total marks = ____	
PST Certificate/ Diploma in Education / ADE.	Marks obtained X 20 / total marks = ____	
MA/M.Sc/M.Ed / MA Edu	Marks obtained X 20 / total marks = ____	
MPhil/PhD	Marks = 05	

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Other conditions:-

1. The concerned Appointing Authority will scrutinize and verify the documents and make the appointment as per prescribed rule and the will get the documents verified after the issuance of appointment orders within shortest possible time, not exceeding ninety (90) days.
2. The merit list prepared by the concerned appointing authority shall be displayed for ten days to receive the objections/appeals, if any, and shall issue the final merit list after making necessary corrections while addressing the observations/objections/appeals, followed by requisite appointment orders.
3. In case a document(s) is/are found fake/ forged/ bogus upon scrutiny/ verification, the service of the teacher concerned shall be terminated and the amount paid to him, as salary shall be recovered from him and an FIR shall be lodged against him on account of forgery/fraud under the relevant law.
4. Dini Asnad from recognized Tazeemat-ul-Wafaqul Madaris, Darul Uloom Saïdu Sharif Swat, Darul Uloom Charbagh Swat, Darul Uloom Chitral, Darul Uloom Darosh Chitral and any other Government run Darul Uloom, as notified by the Government from time to time will be acceptable for the purpose of appointment against the posts of Arabic Teachers or Theology Teachers, as the case may be.

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Annex — I



**GOVERNMENT OF
KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**

Dated Peshawar, 11.07.2012

NOTIFICATION:

No. SO (B & A)/1-18/E&SE/2012: Sanction of the Government of Khyber Pakhtunkhwa is hereby accorded to the up gradation of the posts for Grant of Incentive of Higher Pay Scale to different Categories/Cadres of teachers in Elementary & Secondary Education Department w.e.f. 01-07-2012 as per details given below:-

Sr. No.	Nomenclature of Teaching Cadre Post	Location	Existing Basic Pay Scale	New Approved Basic Pay Scale	Remarks
1.	Primary School Teacher (PST)	Govt. Primary School	BPS-5 BPS-6 BPS-7 BPS-9 BPS-10 BPS-12	(BPS-12)	The post of PST is upgraded to BPS-12. Accordingly, 33,497 posts of PSTs, already sanctioned in various pay scales are upgraded to BPS-12 for the present incumbents as well as future appointees.
2.	Senior Primary School Teacher (Sr. PST)	"do"	Newly Upgraded/Redesignated Post	(BPS-14)	22,331 posts of the existing PSTs in various existing pay scales are upgraded to BPS-14 and redesignated as Senior PST. The posts will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
3.	Primary School Head Teacher (PSHT)	"do"	Newly Upgraded/Redesignated Post	(BPS-15)	20,804 posts of the existing PST's (one post in each Primary School) are upgraded to BPS-15 and redesignated as Primary School Head Teacher, and will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
4.	Certified Teachers (CT)	Govt. Middle/High/Higher Secondary School	BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of CTs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
5.	Senior Certified Teachers (Sr. CT)	"do"	Newly Upgraded/Redesignated Post	(BPS-16)	One thirds (1/3 rd) of the total CT posts are upgraded to BPS-16 and redesignated as Senior CTs which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
6.	Arabic Teachers (A.T)	"do"	BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of ATs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
7.	Senior Arabic Teachers (Sr. AT)	"do"	Newly Upgraded/Redesignated Post	(BPS-16)	One thirds (1/3 rd) of the total AT posts are upgraded to BPS-16 and redesignated as Senior AT, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
8.	Teacher of Theology (TT)	"do"	BS-07 BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of TTs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
9.	Senior Teacher of Theology (Sr. TT)	"do"	Newly Upgraded/Redesignated Post	(BPS-16)	One thirds (1/3 rd) of the total TT posts are upgraded to BPS-16 and redesignated as Senior TT, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
10.	Drawing Masters (DM)	"do"	BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of DMs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
11.	Senior Drawing Masters (Sr. DM)	"do"	Newly Upgraded/Redesignated Post	(BPS-16)	one thirds (1/3 rd) of the total DM's posts are upgraded to BPS-16 and redesignated as Senior DM, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or

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12.	Physical Education Teachers (PET's)	"do"	BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of PETs are upgraded to present incumbents to the post as well as future ap.
13.	Senior Physical Education Teachers (Sr. PET's)	"do"	Newly Upgraded/ Redesignated Post	(BPS-16)	One thirds (1/3 rd) of the total PETs posts are upgraded to B. 16 and redesignated as Senior PET, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
14.	Qari/Qaria	"do"	BPS-7 BPS-9 BPS-10 BPS-12 BPS-14 BPS-15	(BPS-12)	All the existing posts of Qari/Qaria are upgraded to BPS-12 for the present incumbents to the post as well as future appointees.
15.	Sr.Qari/Sr.Qaria	"do"	Newly Upgraded/ Redesignated Post	(BPS-15)	One thirds (1/3 rd) of the total Qari/Qaria posts are upgraded to BPS-15 and redesignated as Senior Qari/Qaria, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.

2. A policy shall also be devised in the framework of input/output criteria in terms of qualification, length of service, regularity, punctuality, results, curricular and co-curricular achievements and other performance indicators, so that the teachers do not take the scheme for granted but work for it.

3. District wise/ school wise breakup of the posts is enclosed herewith as Annexure-A.

SECRETARY

Endst. No. SO(FR)/FD/10-22(E)/2010 Dated. Pesh: the _____ 2012

Copy is forwarded to Accountant General Khyber Pakhtunkhwa, Peshawar.
All District Account Officers

SECTION OFFICER (FR)
FINANCE DEPARTMENT

Endst. Of even Number & Date.

Copy of the above is forwarded to:-

1. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department, with reference to his letter No SO(FR)/FD/10-22(E)/2010 dated 26.06.2012.
2. P.S. to Secretary, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
3. P.S. to Special Secretary, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
4. P.S. to Deputy Secretary-II, E&SE Department, Khyber Pakhtunkhwa, Peshawar
5. P.S. to Minister of E&SE, Khyber Pakhtunkhwa.
6. The Director, E&SE Khyber Pakhtunkhwa, Peshawar.
7. All the Executive District Officers, E&SE Khyber Pakhtunkhwa.
8. The Managing Director, Printing Press, Khyber Pakhtunkhwa, Peshawar.
9. Master file.

Attested

(NOOR ALAM KHAN WAZIR) 11/07/2012
SECTION OFFICER (B&A)
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

(46)

Annex - J

TO,

**THE DIRECTOR EDUCATION FATA
FATA SECRETARIAT DIRECTORATE OF EDUCATION
KHYBER PAKHTUNKHWA, WARSAK ROAD PESHAWAR.**

**DEPARTMENTAL APPEAL AGAINST ORDER DATED 11.10.2017
FOR DISCRIMINATION, VIOLATION OF FUNDAMENTAL RIGHT
AND NON OBSERVANCE OF PROMOTION/SENIORITY OF THE
APPELLANT FROM THE DATE OF NOTIFICATION NO.SO(PE)/4-
5/SSRC/MEETING/2013/TEACHING CADRE DATED 24TH JULY,
2014 FOR PROMOTION OF SCT/CT TO SST GENERAL (BPS-16).**

.....
RESPECTED SIR!

Appellant submits as under:

1. That the Appellant was appointed as Certifies Teacher (CT) on dated 09.10.1986 by your worthy department and has performed her duties on different locations with honesty and full devotion and has been a responsible, hard worker, skillful, dutiful, punctual and obedient teacher and presently the Appellant has promoted to the post of Secondary School Teacher (SST BPS-16) and is posted at GGMS Dawat Kor Mohmand Agency.
2. That the Government of Khyber Pakhtunkhwa Elementary and Secondary Education through NOTIFICATION NO.SO(PE)/4-5/SSRC/MEETING/2013/TEACHING CADRE DATED 24TH JULY, 2014 and recommendation of the Departmental Promotion Committee has promoted the Appellant to the post of Secondary School Teacher (SST BPS-16).
3. That the Deputy Director (Estab) Elementary & Secondary Education Khyber Pakhtunkhwa through letter No.4954 dated 07.08.2014 and letter No.4874 dated 06.08.2014 requested you to fill the vacant posts of SST (General/Science) in Government Higher Secondary/High & Middle Schools (M&F) FATA by promotion of in-service teachers under the existing rules.
4. That after requesting again and again by the Deputy Director (Estab) Elementary & Secondary Education Khyber Pakhtunkhwa through different letters your worthy lordship delayed the process and did not consider the Appellant for his due promotion.
5. That following the above mentioned same Notification, the District Education Officer Male Charsadda through Endst No.10910-92 dated 01.11.2014 promoted 77 SCTs/CTs,

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SDMs/DMs, SATs/ATs, STTs/TTs, Senior Qaris/Qaris, PSHTs/SPSTs, to the post of SST (Bio-Chem), SST (Phy-Maths), SST(General) BPS-16.

6. That your August office has not observed the appellant promotion from his due date i.e 24th July,2014 according to Notification and has order the same through letter Endst No.15751-800 dated 11.10.2017, So Appellant has not been treated in accordance with law, and appellant rights secured and guaranteed under the law and constitution have been violated.
7. That this order of your office has affected the Seniority/promotion of the Appellant because the Seniority of the SST teachers in Khyber Pakhtunkhwa and FATA are the same and not considering the appellant from the due date adversely affect the appellant right for seniority in Subject Specialist in Higher Secondary School as well as Headmistress in High Schools which is clear violation of fundamental rights of Appellant.
8. That the discrimination as observed by this office with Appellant is highly deplorable and condemnable, being unlawful, unconstitutional, without lawful authority, without jurisdiction, against the norms of natural justice, equity and against the law on subject, hence liable to be declared void ab initio.
9. That the act of your good office' not making promotion order from the date of Notification of Khyber Pakhtunkhwa i.e 24th July,2014 is based on malafide, and ulterior motive.
10. That the action on the part of your good office has been affecting adversely appellant financial rights as protected by the constitution and the Appellant be treated at par like other employees who are promoted and as such to equally dealt in accordance with the law and rules.

It is therefore, most humbly prayed that on acceptance of the instant appeal an appropriate direction may please be issued and the promotion order of the Appellant may kindly be ordered from the date of Notification i.e 24th July,2014 and any other relief not specifically prayed for and to which the Appellant is found entitled may also be granted.

DATED:25-10-2017

APPELLANT

Kausar

MST. KAUSAR PARVEEN GGMS DAWAT KOR MOHMAND
AGENCY GOVERNMENT OF KHYBER PAKHTUNKHWA
EDUCATION DEPARTMENT.

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Annex - K

TO,

**THE DIRECTOR EDUCATION FATA
FATA SECRETARIAT DIRECTORATE OF EDUCATION
KHYBER PAKHTUNKHWA, WARSAK ROAD PESHAWAR.**

REMINDER FOR CONSIDERATION OF DEPARTMENTAL APPEAL AGAINST UNJUST ORDER DATED 11.10.2017 FOR DISCRIMINATION, VIOLATION OF FUNDAMENTAL RIGHT AND NON OBSERVANCE OF PROMOTION/SENIORITY OF THE APPELLANT FROM THE DATE OF NOTIFICATION NO.SO(PE)/4-5/SSRC/MEETING/2013/TEACHING CADRE DATED 24TH JULY, 2014 FOR PROMOTION OF PSHT/SPST/PST TO SST (GENERAL) BPS-16.

RESPECTED SIR!

Appellant submits as under:

That in continuation of the departmental appeal dated 25.10.2017 on the subject cited above and to request you that the promotion order of the Applicant may kindly be ordered from the date of Notification i.e 24th July,2014 because your August office has not observed the applicant promotion from his due date i.e 24th July,2014 according to Notification and has order the same through letter Endst No.15751-800 dated 11.10.2017, So Applicant has not been treated in accordance with law, and applicant rights secured and guaranteed under the law and constitution have been violated. Furthermore this order of your office has affected the Seniority/promotion of the Applicant because the Seniority of the SST teachers in Khyber Pakhtunkhwa and FATA are the same and not considering the applicant from the due date adversely affect the applicant right for seniority in Subject Specialist in Higher Secondary School as well as Headmasters in High Schools which is clear violation of fundamental rights of Applicant.

It is therefore requested that applicant promotion order may kindly be reviewed in the light of the departmental appeal dated:25.10.2017 in the best interest of justice.

DATED:15-01-2018

APPLICANT.

Kausar

MST. KAUSAR PARVEEN GGMS DAWAT KOR MOHMAND
AGENCY GOVERNMENT OF KHYBER PAKHTUNKHWA
EDUCATION DEPARTMENT.

(Ua)

Amx — L

TO,

THE DIRECTOR EDUCATION FATA
FATA SECRETARIAT DIRECTORATE OF EDUCATION KHYBER
PAKHTUNKHWA, WARSAK ROAD PESHAWAR.

Reminder in continuation of the departmental appeal dated 25.10.2017 for your oral promise regarding consideration of Departmental Appeal Dated 25.10.2017 against Notification Endst No.15751-800 dated 11.10.2017.

.....
Applicant submits as follow:

1. That the Applicant is a regular employee of your worthy department and is a loyal, hard worker, obedient and duty full since her appointment.
2. That the Government of Khyber Pakhtunkhwa Elementary and Secondary Education through NOTIFICATION NO.SO(PE)/4-5/SSRC/MEETING/2013/TEACHING CADRE DATED 24TH JULY, 2014 and recommendation of the Departmental Promotion Committee has promoted the Appellant to the post of Secondary School Teacher (SST BPS-16).
3. That your August office has not observed the appellant promotion from his due date i.e 24th July,2014 according to Notification and has order the same through letter Endst No.15751-800 dated 11.10.2017.
4. That your department has not applied its mind while exercising its discretion to promote the employees from the due date, which has resulted in pick and choose.
5. That every individual had an inalienable right to be dealt with in accordance with law and equal treatment of citizens has been guaranteed by the Constitution.
6. That your office had orally promised to consider my departmental appeal as per Notification dated 24 July, 2014, but till date neither any action has been taken nor has the applicant been informed by your worthy office.

It is therefore requested that Applicant departmental appeal may kindly be considered.

Dated :11.06.2018

APPLICANT

Kausar

MST.KAUSAR PARVEEN GGMS
DAWATKOR MOHMAND AGENCY
GOVERNMENT OF KHYBER
PAKHTUNKHWA EDUCATION
DEPARTMENT.

49 - A

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

KAUSAR PARVEENAPPLICANT.

VERSUS

GOVERNMENT OF KHYBER PAKHTUNKHWA THROUGH SECRETARY
ELEMENTARY AND SECONDARY EDUCATION SECRETARIATE
BUILDING PESHAWAR AND OTHERS


**APPLICATION FOR CONDINATION OF DELAY IN ABOVE
TITLED CASES IF ANY.**

1. That the impugned appeals are filed before this Hon'able court and is fixed for today.
2. That there are some delay in the above titled appeal but the said delay was never intentional but due to verbal promises of the respondents.
3. That the Respondent No.2 hand over the matter in dispute to Respondents No.3 who accompanied the appellatant to civil secretariat Peshawar to resolve the issue but the respondents delayed the matter.

49-B

4. That even law favours adjudication of cases on merit rather on technicalities.
5. That there is no legal bar on acceptance of this petition.

It is therefore requested that on acceptance of this petition the above titled appeal may kindly be condoned in the best interest of justice.

Appellant
Through 
Abdur Rahman Mehmood
Advocate High Court Peshawar.

تاریخ 50 روپے	95175			
ایڈوکیٹ: عبدالرحمن کیمسند		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل / ایسوسی ایشن نمبر: BC-10-0611		رابطہ نمبر: 0300 5991598		

بعدالت جناب: خیبر پختونخواہ سروس ٹریبیونل پشاور

مخانب: اپیلانٹ	دعویٰ:
	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ
 آن مقام پشاور کے لیے عبدالرحمن کیمسند ایڈوکیٹ کو وکیل مقرر
 کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو
 راضی نامہ کرنے و تقریر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست ازہر قسم کی تصدیق
 زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز
 دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
 کاروائی کے واسطے اور وکیل یا مختار قانونی کارکن سے براہ راست یا غیرہ کا اختیار ہوگا اور صاحب
 مقرر شدہ کو وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور ان کا ساختہ پر داخست منظور و قبول ہوگا
 دوران مقدمہ میں جو خرچہ ہر جاندا تو ائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے
 باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: 09-10-2021
 PRAWAR BAR ASSOCIATION
 PESHAWAR

مقام پشاور کے لیے منظور ہے۔
 Attested & Accepted
 *
 RAHMAN

نوٹ: اس وکالت نامہ کی فونو کاپی ناقابل قبول ہوگی۔

ATTENDED

مسماة كوثر پير وین زوجه فیض محمد سلسنہ نامو كور ڈكٹا نیكہ غنڈ تحصیل بند یابی ضلع كویٹہ
 Kailash
 CNIC : 21401-2336979-2

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

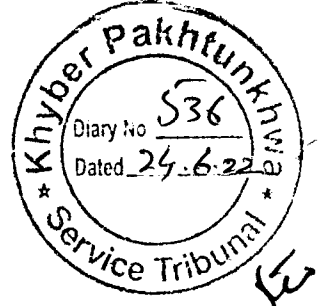
C.M.NO. -----/2022

IN

Service Appeal 7582/2021

Mst Kausar Parveen SST General ASDEO [Female] District Mohmand
Ghalani

..... Appellant



VERSUS

*Put up to the court with
appellant.
24/6/22.*

*Prof. Waheed
Fakher
date 24/6/22*

- 1) Secretary to Govt of Khyber Pukhtunkhwa Elementary and
others
-Respondents

**APPLICATION FOR SUBMISSION OF WRITTEN REPLY IN THE SUBJECT SERVICE
APPEAL ON BEHALF OF RESPONDENTS**

RESPECTFULLY SHEWETH:

1. That the subject service appeal is pending before this Honourable Tribunal and was fixed for hearing by today i.e. 24/06/2022.
2. That representative of the respondent No. 4 being newly nominated to attend the office of Additional Advocate General, Service Tribunal for getting vetting of the subject service appeal reply from the Law Officer / Additional Advocate General by today i.e. 24/06/2022.

3. That inadvertently the representative of the respondent could appear before this Honorable Tribunal because of unawareness of the subject case fixation date for today i.e 24/06/2022.
4. That latter on representative came to know that the subject case was fixed for 24/06/2022 and defence of the respondents has been struck off by this Honorable Tribunal.
5. That delay for submission /written reply was not intentionally but due to misunderstanding of fixation date.
6. That the respondent department has got vetting of written reply from the Additional Advocate General office and will submit within a few days if the respondent department may kindly be allowed a short date for submission reply in the subject case.

Therefore it is, humbly requested that on acceptance the instant application the respondent department may kindly be allowed a short date for submission of written reply in the subject case.


Deponent

Shahnaz Sardar